

# Preserving and Revitalizing NH Resident-Owned Communities

2024 PRICE Act Submission to U.S.  
Housing and Urban Development

Lead Applicant: New Hampshire Community Loan Fund

Partner: New Hampshire Community Development Finance Authority



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**EXHIBIT A: Executive Summary**

New Hampshire Community Loan Fund

## Preserving and Revitalizing NH Resident Owned Communities: Executive Summary

The New Hampshire Community Loan Fund (NHCLF) is a Community Development Financial Institution (CDFI) that has been financing manufactured home communities in New Hampshire for 40 years. NHCLF helps homeowners who live in manufactured home communities buy the land beneath their homes and run their communities as not-for-profit cooperatives. Resident-owned communities (ROCs) benefit homeowners by providing control over land rental fees and park conditions, eliminating the risk of park closure and displacement, and giving residents a chance address deferred maintenance and often long-ignored infrastructure and environmental problems. There are currently 149 ROCs in New Hampshire, which are nearly half the manufactured home ROCs in the United States.

NHCLF Fund submits this historic PRICE Act proposal, under the PRICE Main component, in partnership with the NH Community Development Finance Authority (NH CDFA), the state's quasi-public community and economic development entity. The following three-pronged approach will preserve and enhance affordable and accessible housing. The entirety of this proposal meets the National CDBG Objective of benefiting people with low and moderate incomes (LMI).

### Improvement of Infrastructure:

- Infrastructure repair in ROCs (\$60M). Infrastructure repairs, including water, sewer, and electric, are essential to the long-term success and preservation of ROCs as affordable housing and will help these communities become climate resilient. Broken and aging systems lead to resource waste and expense, and continued degradation of structures. Between 15 and 18 ROCs, including between 1,500 and 1,650 LMI homeowners will benefit.

### New Housing Opportunities:

- Infill, site work, new pads, and utility hook-ups for new homes in ROCs (\$500,000). Funds from this PRICE Act request will help ROCs, particularly those in the rural Coos and Carroll counties in the northern part of the state, create new affordable housing. Between 25 and 30 new pads will be set.

### Preservation and Revitalization Activities:

- Preservation Fund to support the creation of new ROCs (\$5M). The Preservation Fund will help homeowners who wish to buy the land beneath their homes and compete with large, well-funded, out-of-state, for-profit buyers. Funds from this request will help homeowners with low incomes create new ROCs, preserving affordable, accessible homeownership for the long term. The Preservation Fund will help between 4 and 6 communities become ROCs, benefiting between 500 and 800 homeowners.
- Rehabilitation Loan Financing or Gap Financing (\$3M): Gap financing will make it possible for ROCs to access low-cost financing to complete infrastructure projects (largely for water and sewer repair and upgrade) that meet unanticipated cost overruns. NHCLF expects between 4 and 7 ROCs to need Gap Financing.

An award from the PRICE Act is a life changing opportunity for low-income homeowners and will provide their communities for long-term financial, environmental (including health and safety), and affordable housing success.

**EXHIBIT B: Threshold Requirements**

New Hampshire Community Loan Fund

**THRESHOLD REQUIREMENTS**

The New Hampshire Community Loan Fund (NHCLF) is a Certified Community Development Financial Institution with 501c3 nonprofit status. NHCLF is eligible for funding as an “Other: 25” applicant.

**SF- 424** NHCLF has reviewed the certifications and assurances associated with this application for Federal assistance. NHCLF acknowledges the truthfulness of the certifications.

**Assurances (HUD 424-B)** NHCLF will comply with U.S. statutory and other requirements, including but not limited to civil rights requirements.

**Federal Assistance Representations and Certifications** NHCLF has completed the Federal Assistance Representations and Certifications section of the sam.gov registration.

**Budget Form 424-CBW.** NHCLF has completed the 424-B.

NHCLF has completed the following forms as part of this application: **424-CBW, SF-424D, SF-424B, HUD 2880, Disclosure of Lobbying Activities, Certification of Lobbying Activities.**

NHCLF has completed a **Code of Conduct** and included it in this application.

NHCLF and NH CDFA confirm that both organizations are in Good Standing with the State of New Hampshire and have no pending Civil Rights matters.

Other sub-recipients, including municipalities and Resident-Owned Communities, will be selected through an application process. Government entities and cooperatives are both eligible to receive PRICE funding per the NOFO.

Project partners confirm that only one application is being submitted under this NOFO.

**EXHIBIT C: Need**

New Hampshire Community Loan Fund

## **NEED**

### **Project area and need for affordable accessible housing**

All work for this proposal will be conducted statewide in New Hampshire, which is home to the deepest sectoral change effort in the country for the ROC model, where innovation has long been tried and tested.

ROCs are enterprising communities and have proven to be very successful over 40 years. Since NHCLF helped create the first ROC in 1984 in Meredith, New Hampshire, where a group of homeowners bought the land beneath their homes and saved their community, not one ROC in the state has “failed” or converted back to private ownership. By working with ROC homeowners and leaders, NHCLF has developed an extensive technical assistance program and a range of financing products to meet the needs of homeowners with low incomes. NHCLF’s ROC-NH program supports manufactured homeowners from the pre-conversion phase to infrastructure, filling vacant lots, and single-family mortgage financing. NHCLF’s goal is to increase affordable housing opportunities, particularly affordable homeownership opportunities, and to preserve existing manufactured housing as safe and affordable for the long term.

The ROC-NH program has been so successful that the Ford Foundation encouraged NHCLF to grow the program nationally. In 2008, NHCLF helped launch ROC USA, which brings the model NHCLF developed here in New Hampshire to low- and moderate-income (LMI) communities across the country.

### **Infrastructure, the Need to Preserve Existing Communities**

PRICE Act funds offer a vital lifeline for ROCs in New Hampshire to, in some cases at long last, make much needed and often overdue infrastructure repairs that will ensure that their communities are safe, secure, and provide for efficient use of water, treatment of waste and stormwater, and reliable electricity. NHCLF and its partner NH CDFA, the state’s Community Development Block Grant (CDBG) administrator, are deeply familiar with the difficulties ROCs have faced through trying to fix problems caused by aging systems and deferred maintenance by former investor owners. ROCs have been superb partners in these endeavors. ROC residents want to stop sewage leaking into nearby rivers and streams, remove old underground tanks, and clean-up dumping grounds. ROC residents want to drink clean water and have efficient systems that are not wasteful. This is time-consuming and patient work, but the improved results are often life altering.

When a manufactured home community becomes a ROC, homeowners have the chance to address what are sometimes difficult and dangerous problems. While wearing the hat of a lender, NHCLF has often had to step up and serve as an “environmental remediation team.” NHCLF and NH CDFA have helped ROCs that were on long-time boil orders because their water was poisoned with E. coli bacteria. Unsafe electrical systems have left residents at risk of fire. At one ROC, NHCLF learned that children, would head out onto the grass in their bare feet after a rain because it made their feet “tingle,” due to a substandard electrical system. At another ROC, children played in a back field that was swamped with effluent. The work that addresses the environment and water and electrical efficiency also addresses the health and safety of residents.

Historically, much of this remediation has been funded by USDA-Rural Development, NH Department of Environmental Services, and CDBG, as well as loans taken on by the



communities. But there are many other communities that do not qualify for these government funds, and they have not been able to make these much needed infrastructure repairs.

While PRICE Act funds will be available to all 149 ROCs (nearly half the manufactured home ROCs in the country), through outreach efforts, NHCLF has identified 39 ROCs with more than \$103M in infrastructure repair needs that will be prioritized for funding through a scoring rubric. See page 13 for a complete list of these communities and how they were selected. The majority of these ROCs on the list are connected to municipal water systems, which means they do not qualify for USDA-RD funds, and CDBG dollars' fall short of project cost. A significant problem is leaking water, which costs money and wastes resources. In one ROC in Conway, NH, that has suffered leakage for years, water consumption has been documented to exceed more than 500 gallons per home per day (a typical two-bedroom home uses 120 to 200 gallons per day). The excess water leakage costs significant dollars, and the situation is causing this ROC financial insecurity.

PRICE Act funding is also very much needed for 16 ROCs located in economically distressed areas, where the homeowners are all very low and low-income Area Median Income (AMI). Infrastructure projects in these ROCs are unaffordable without significant or full subsidy.

Some examples of need include a ROC in Bridgewater, NH (located in a distressed area). This community has suffered from repeated water quality violations, with reports noting elevated concentrations of lead, copper, and E. coli bacteria. At this ROC, the water consumption is higher than average, indicating that the distribution system is leaking. The water leaks also mean a risk of contamination from onsite septic systems or other sources. The property condition report recommends replacing the distribution system and improving the wells and wellhouses at a cost of \$770,000. The ROC is not able to access other funding sources to support this expense.

One of the reasons infrastructure repair is so needed, is because many manufactured home parks were constructed between the 1950s and the 1970s. The materials used for water and wastewater systems vary, but many were constructed with "Orangeburg" pipe, a popular pipe installed through the early 1970s. It was made of ground wood fibers bound together with a water resistant adhesive and liquified tar pitch. Installers liked it because it was lightweight and easy to cut; on the other hand, the pipes are prone to root invasion and deformity, causing leakage.

At a ROC in Litchfield (located in a distressed area), the aging water system was installed 30 years ago, when the park was converted from a campground. The system was made with undersized polyethylene pipe, which is now leaking, causing excess consumption and repair costs. Five of the septic systems (all original to the park) have been replaced at the ROC's expense. Due to these costs, the ROC has depleted their repair and replacement reserve account. A 2022 CDBG-funded Infrastructure Evaluation Report recommended that this ROC replace the entire water distribution and septic systems with a connection to municipal water. This project is estimated to cost \$1.7M. Beyond debt, which this community can't afford, PRICE Act funds would be the only funding source to make these repairs possible. This is also a very low-income community, with 80% of households below 80% AMI and 32.5% below 30% AMI.

A grant from the PRICE Act will enable NHCLF to provide on-site and back office support to ROCs that face unsafe environmental, infrastructure, and health conditions. The work involves coordinating beleaguered homeowners, engineers, and frustrated public officials eager to help, by facilitating a sustainable and entrepreneurial solution.

## Need for Affordable Homes

The need for secure, affordable housing is one of the most significant problems facing New Hampshire. A 2023 report that ranked housing need against population size stated that New Hampshire ranked fourth in the nation (Up for Growth, NH Business Review, October 2023), coming in just behind California, Utah, and Idaho. Low-income residents face record-setting high housing costs and a low housing inventory (both for rental and purchase). Inventory is even lower for affordable homes. There has been an affordable housing crisis in this state for many years now, which only escalated during the pandemic, and deepened with rising interest rates and housing costs in the last three years.

New Hampshire, population 1.4 million, faces a shortage of 23,500 units of housing today and needs 60,000 new units by 2030 (2023 NH Statewide Housing Needs Assessment). Many families that can afford to buy, continue to rent because of the scarcity of affordable homes for sale.

The average price of a New Hampshire home in 2023 was \$470,000 and this spring the average price hit \$500,000 (NH Association of Realtors), which most families earning 80% AMI cannot afford. The state's Housing Affordability Index continues to drop below 100; down to 65 in 2023, from 97 in 2022, and from 143 in 2020 (NHAR, 2023). A value below 100 means that a family with a median income can't qualify for a mortgage on a median-priced home.

Home prices in New Hampshire have increased on average \$187,000 per home (66%), in the last five years. Homes priced under \$300,000 typically sell in less than 30 days, often cash deals, which leave many first-time buyers behind (NHAR, 2023).

Manufactured housing is in demand and affordable to families with low (80% AMI) and very low incomes (50% AMI). Nearly all single-family homes in New Hampshire that are sold for less than \$150,000 are manufactured homes.

NHCLF's Welcome Home Loan program, which offers fixed-rate, long-term mortgage financing to manufactured homes in ROCs and on their own land, has been making record numbers of single-family loans. In FY22, Welcome Home closed \$5.6M in loans for homes in ROCs, and in FY23 closed \$8M. Last year, Welcome Home prequalified 750 families to purchase a home. But inventory is so low, most families have to wait many months, sometimes years, before a bid on a home is successful. The lack of homes puts low-income home buyers at a disadvantage as they are also competing with cash buyers, buyers who are not so low income, and investors looking to flip homes. There are presently only 142 manufactured homes listed for sale on the MLS (as of April 19, 2024).

Manufactured homeownership in a ROC is cheaper than renting. While a two-bedroom rental averages \$1,760 in New Hampshire (NH Housing Finance Authority Report), owning a manufactured home in a ROC costs an average of \$1,300 per month; a savings of \$460 per month, which totals more than \$5,520 per year. This savings bolsters a family's food budget, keeps a senior from having to decide between food and medicine, or covers the cost of reliable transportation that supports employment.

### **Need for pads for new manufactured homes**

ROCs often have vacant lots, usually left over from their previous investor owner. These are approved, affordable housing opportunities that can remain vacant without informed technical assistance and, in some cases, subsidy.

Many of the ROCs most in need of subsidy for new pads are in New Hampshire's rural north country, where the cost of new manufactured homes and related construction expenses for pads has made home prices greater than the market can support. Installing new pads and setting homes on them will add new affordable homes (as well as provide additional lot rents, which helps support a ROC over the long term). These communities simply can't take on additional debt to install pads, even with our low-cost Revolving Lines of Credit (or RLOCs) that NHCLF offers at 5% interest. These lines of credit have helped many ROCs fill their vacant lots and are repaid after pads are installed and new homes are set and sold.

With PRICE Act funding, new pads can be poured (which includes site prep and utility hook ups), thereby making the total cost of the new home more affordable in the rural north country market. NHCLF has been able to secure small grants for individual pads at north country ROCs and the homes sell right away. PRICE Act funding would enable this effort to go to scale.

### **Need for Acquisition Financing**

Many current park owners are aging mom-and-pop type operations that own between one and three parks. As these owners put their parks on the market, the communities catch the eyes of well-capitalized, institutional buyers, such as billion-dollar private equity firms. The large conglomerate corporations, which are often Real Estate Investment Trusts (REITs), seek to aggregate ownership of thousands of parks, especially the larger (100+ unit) communities and those serving seniors. These competitive interests undermine the resident ownership model (where residents can control their rents). REITs are a threat when they offer a price well above the appraised value knowing they can raise the rents to get the return they are anticipating. NHCLF has seen first-hand the misinformation campaigns used by national buyers to frighten and discourage homeowners, especially seniors, from forming cooperatives and controlling their financial futures. Large, out-of-state buyers not only raise rents, but add on numerous fees (pet, garbage, plowing), and homeowners have little choice but to pay more or sell their homes.

NHCLF has in-depth experience with low-income homeowners who live in large ROCs sought after by corporate interests. Unfortunately, without low-cost financing, in most of these situations, low-income homeowners stand little chance. In the last 10 years, private equity buyers have pushed park prices upwards by 25%. Since 2016, at least 10 New Hampshire manufactured-home parks, containing about 2,900 homes, have been purchased by out-of-state equity investors from Las Vegas, Chicago, California, Michigan, and Illinois for a total of \$245M.

But an example of a successful purchase happened in 2019, in what NHCLF called the "Big Deal" when three large parks consisting of 934 homes went up for sale at once. NHCLF helped the homeowners organize and create ROCs. In the end, the homeowners were able to purchase the land beneath their homes. The total package was \$59M (with \$19M from NHCLF and \$40M leveraged from other private and public sources). The deal was possible because NHCLF was able to secure \$3.5M in permanent equity, or acquisition financing. Securing acquisition

financing is not always possible (in fact, it is rare), and without it, low-income homeowners cannot preserve their parks.

An example of how interest rates impact monthly lot rental rates happened in December 2023, when NHCLF provided a 5.15% interest loan for low-income homeowners to purchase their park. Even with this moderate interest rate, it caused the monthly lot rent to increase \$185, from \$400 to \$585. A loan at 6.15% interest would have raised the monthly lot rent to \$645 per month. And a 9% interest rate, which is not atypical today, would have meant \$800 per month lot rent, which would have been unaffordable. In some cases, the only way low-income homeowners can afford to purchase their park would be to access 3% interest rates, or even lower, as was the case of the Big Deal.

Obtaining revolving equity grants are hard to come by because there are few sources outside of the US Treasury CDFI Fund. And in the last decade, CDFI grants to NHCLF have been averaging \$540,000, which is not enough to help low-income homeowners stand up against well-financed REITs. Overall, there is little mainstream capital in the manufactured housing sector. Manufactured housing park cooperatives are not eligible for financing under New Market Tax Credits or Low-Income Housing Tax Credits. This housing sector is in between multi-family rental housing and homeownership as defined by the secondary markets. The manufactured housing market is not well served by private or public agencies (and stigma that belies the data that it is an asset that appreciates).

Without this kind of low-cost capital, NHCLF has witnessed low-income homeowners who want to buy their parks but cannot because they lack access to low-cost capital. The Preservation Fund would be a significant shot-in-the-arm for low-income homeowners, and serve as a revolving loan fund, available to help low-income homeowners purchase and preserve their parks long into the future.

NHCLF is currently working with three communities that want to become ROCs, but each face uphill battles against out-of-state buyers. One is an 80-site approved (79 occupied) community in Barrington, NH, that was sold to an out-of-state REIT for \$3.7M in 2020. In the spring of 2024, the REIT put the park back on the market for \$6.5M, almost double the price in just three years. The low-income homeowners are trying make an offer or else they face displacement and sure-to-be ever increasing monthly lot rents and add-on fees.

Demand for financing sometimes comes in liquidity defying spurts. The Preservation Fund means that NHCLF will be prepared to help low-income homeowners, especially those in larger parks, when they are hit with a the 60-day notice. Without this kind of financing, there will be times NHCLF won't be able to.

A much-needed Preservation Fund will enable NHCLF to offer low-cost financing, which will make it possible for homeowners with low incomes to compete with REITs and buy the land beneath their homes, control their lot rents, maintain affordability, and repair their infrastructure to conserve water and ensure climate resilience.

### **Need for Gap Financing**

NHCLF has had direct experience that shows that Gap Financing is an essential tool for ROCs that need to complete infrastructure projects. This kind of funding addresses funding gaps due to unanticipated cost overruns. An example of why this financing is needed is a ROC in

Portsmouth, NH, that offers critical affordable housing in one of the highest-cost housing areas in the state. Many of the residents are essential workers, employed at a nearby grocery store, and several are disabled and unable to work. The ROC needed to remove dilapidated homes, build a new road so that it could be accessed by emergency vehicles, and place six new affordable homes. This project was paid for through CDBG funding and debt financing from the ROC. At first, the ROC needed \$500,000 in 0% financing to complete what was then a \$1M project. However, the contractors encountered stubborn granite ledge and other unanticipated issues that significantly added to the project's total cost. In the end, the project cost \$1.6M and the ROC needed \$900,000 in 0% financing.

NHCLF was able to fundraise for the first \$500,000 in 0% financing but had to provide the rest from capital reserves. NHCLF cannot afford to offer 0% loans to multiple ROCs without grant subsidy. NHCLF sees Gap Financing as a risk mitigation strategy and important for both PRICE Act funded projects and for ROCs that have access to other funding (such as USDA-RD, NH DES, CDBG), but need low-cost capital to bring projects over the finish line. NHCLF anticipates that between 4 and 7 ROCs will need access to Gap Financing within the grant period.

### **Distress Communities and Resilience in Disaster-Prone Areas**

For the 39 ROCs on the list that need PRICE Act funding, 16 are in Distressed Areas (higher levels of unemployment and poverty). There are no ROCs in New Hampshire located in disaster-prone areas, however there are several north country ROCs identified on the Climate and Economic Justice Screening Tool in areas above the 90<sup>th</sup> percentile for climate risks.

NHCLF has identified 1,155 homes in 16 ROCs that are distressed areas, nearly half the total number of homes that are eligible for PRICE Act funds. One ROC on this list is in North Conway (a distressed area), where 75% of the homeowners are low income (below 80% AMI), and several are disabled. This community has a water distribution system that is more than 40 years old and at the end of its design life. This is the ROC where the water consumption has been documented to exceed more than 500 gallons per home per day.

Another example is a 107-unit ROC in Ossipee, NH. In 2020, homeowners in this ROC used a USDA-RD loan and grant to replace its water system. But a 2017 preliminary engineering report indicated that most onsite septic systems are beyond their estimated useful lives. The septic tanks are located under homes, which creates a hazardous condition for pumping and repairs. The report anticipated that 25% of the systems will need to be replaced.

This ROC was unable to fund the replacement of the septic systems at the time of the water replacement, and now many systems are failing. Replacement costs will lead to unaffordable rent increases if a funding source, such as PRICE Act funds, cannot be identified. This is a very low-income community, with over 81% of homeowners below 80% AMI and 26.5% are extremely low-income households, below 30% AMI. Over 10% of households are disabled and over 20% are single woman headed households.

For the ROCs that can potentially receive new pads to add to the affordable housing stock, five of the six are located in Distressed Areas.

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

Barriers to **ROC infrastructure projects** largely consist of the following:

- Lack of access to grant funding, such as USDA-RD, CDBG, NH DES. These funds are limited and not available to all ROCs in New Hampshire.
- Lack of ability to take on additional debt financing.
- Sometimes ROC Boards are not ready to take on a large infrastructure project.

Funding from the PRICE Act addresses all three of these issues, by decreasing cost barriers as well as providing for in-depth training (including a video that can be shared nationally) to help ROC Boards become prepared to take on and complete infrastructure repairs.

Participation in all Technical Assistance for the infrastructure projects will be supported and maximized by providing in-person and online options to help overcome barriers to physical participation. NHCLF's Language Access Plan provides for translation services (both in person and written) as well as ASL.

NHCLF has been working to remove systemic barriers to **filling vacant lots** through providing RLOCs (revolving lines of credit) and TA to ROC Boards so that they have the know-how to add new affordable housing to their communities. However, sometimes these resources are not enough to compensate for the steep rise in home prices, which coupled with the cost of a new pad, make the new home unaffordable for low-income families.

Barriers to securing the land beneath manufactured homes to **create and preserve ROCs** is directly tied to access to low-cost capital, so that rents do not increase more than homeowners can afford. This is especially true for large communities that are especially sought after by REITs.

When ROCs engage with infrastructure repair, but run into unanticipated costs, without access to low-cost capital, the increase in cost can cause monthly lot rents to rise, destroying affordability for low-income homeowners and homebuyers. **Gap Financing** directly addresses this barrier.

### Fair Housing and ROCs

The State of New Hampshire is predominantly white (87.2%, U.S. Census 2020). Despite the relatively small percentage of minority groups in the state, NHCLF recognizes that language can be a barrier. Furthermore, due to the rural nature of the majority of the state, and the location of the ROCs, oftentimes a vehicle is needed to live in a ROC since most are not located on a bus route.

The Fair Housing narrative included with this application details NHCLF's efforts to Affirmatively Further Fair Housing.

New Americans in ROCs: NHCLF works with Overcomers Refugee Service and the Organization for Refugee and Immigrant Success to help New Americans buy homes in ROCs. A barrier for New Americans is that they sometimes need a car to live in a ROC. Language for New Americans can also be a barrier, but as further described on page 27, ROCs have been successfully overcoming this barrier.

**EXHIBIT D: Soundness of Approach**

New Hampshire Community Loan Fund

## **SOUNDNESS OF APPROACH**

### **Project Description, Management, and Impact**

**Vision:** NHCLF's vision is that all low-income manufactured homeowners living in ROCs will have the resources to maintain and repair the infrastructure their communities need for health, safety, environmental mitigation, and improved financial savings; increase the supply of affordable manufactured housing in ROCs; and that manufactured homeowners have the financing they need with the terms they need, when they want to buy the land beneath their homes to preserve long-term affordability.

**Goals:** Over the five-year grant period, NHCLF anticipates that the following will be accomplished:

- 15 to 18 ROCs will be able to repair needed infrastructure (\$60M).
- 25 to 30 pads for new homes will be installed, and homes set, increasing the supply of affordable housing (\$500,000)
- 4 to 6 new ROCs are created through land purchased beneath their homes, preserving between 500 and 800 homes for affordable housing (\$5M).
- 4 to 7 ROCs can complete their projects with Gap Financing (\$3M).
- A video and other training tools to be shared nationally to help ROCs prepare for infrastructure work.

### **Innovations**

NHCLF is a national leader in helping ROCs be successful over the long term. PRICE Act funding will further innovations that can be shared across the country.

- 1) NHCLF will be adding new training modules specifically designed to help ROCs that are not quite shovel ready in the first year or two of the grant period to become shovel ready. The training will build upon the current ROC Operations, a program that trains new and existing ROCs how to best manage their PRICE Act funded facilities. The new TA will include one-on-one sessions and peer-to-peer training opportunities, made available through the statewide ROC2ROC network and the ROC-NH Facebook page. NHCLF will also make a short video detailing steps to become shovel ready. This video can be shared with other ROCs and TA providers across the country (through ROC USA).
- 2) PRICE Act has generated the creation of a new partnership between NHCLF and NH CDFA. Both organizations will work hand-in-hand to ensure that the funds are spent efficiently and effectively. The organizations bring decades of experience working with ROC infrastructure. This information can be shared around the country and set the bar for how other CDFIs might partner in their states to undertake this work.
- 3) A third innovation, the Preservation Fund, is a game-changer for manufactured homeowners with low incomes who wish to buy the land beneath their homes to compete on a level playing field with out-of-state, private equity buyers. Without this grant funding, which will provide low-cost financing, homeowners with low incomes will not be able to afford to buy their parks. These funds are not currently available, putting larger parks, in particular, at great disadvantage if they want to purchase their land.
- 4) PRICE Act funds make it possible for infill, or new housing opportunities, to go to scale. Without these critical funds, new homes would not be set, and affordable housing opportunities lost.



- 5) Finally, PRICE Act funds will make it possible for ROCs to overcome unanticipated cost overruns and maintain affordability. This funding is not currently available.

### **Meeting the National Objective**

All goals and activities in this proposal meet the HUD National Objective of benefiting people with low incomes. Income levels in ROCs have been stable over time. Historically, nearly 80% of homeowners have incomes at 80% AMI, or below, and that percentage remains true today. The most recent analysis of self-reported income surveys shows that 50% of ROC homeowners in New Hampshire are very low or extremely low income: 29% of ROC homeowners have incomes that are between 30% and 50% AMI, and 21% are below 30% AMI. In the scoring rubric, ROCs in distressed areas have been prioritized for infrastructure work, as well as ROCs for new pads to create new affordable housing. Deed restrictions on the homes set on pads funded through PRICE Act funds will require that homes be made available for families with low incomes for a minimum of 15 years.

### **Approach for Infrastructure for ROCs**

On day one, NHCLF will hit the ground running with an experienced TA team and a strong partnership with NH CDFA, which has decades of experience in administering CDBG funds to ROCs. NHCLF's recent experience helping New Hampshire ROCs access one-time American Rescue Plan Act (ARPA) funding, which is making it possible for 30 ROCs to improve their water and waste system infrastructure, has also informed this approach. NHCLF anticipates that between 4 and 6 ROCs per year will see their infrastructure repaired (15 to 18 over the course of the grant period). NHCLF expects three rounds of funding, with projects taking between 12 and 24 months to complete. PRICE Act funds would make it possible to nearly triple the number of infrastructure projects conducted annually at ROCs in New Hampshire (historically between one and two per year).

It has not been NHCLF's experience that homeowners will need to be displaced during the construction process.

The approach to completing PRICE Act funded goals and activities is based on decades of experience of working with ROC Boards and completing infrastructure repairs. The approach incorporates the combined strengths of NHCLF's ROC-NH team and NH CDFA's work with CDBG-funded ROC infrastructure projects.

NHCLF is an experienced federal grants administrator. NHCLF has received 81 Federal awards since 1997, totaling over \$247 million from six different Federal agencies across multiple programs. In 2023, NHCLF received its largest grant to date: two awards from USDA totaling \$191M where NHCLF is serving as the grant administrator to upgrade local meat processors across the nation.

For PRICE Act funding, NHCLF will be the direct grant recipient and the sub-recipients will be the New Hampshire ROCs identified through the process below. NH CDFA will serve as a partner and a consultant. NHCLF will serve as the Grant Administrator for the selected ROCs.

In early April 2024, NHCLF sent an electronic survey to all 149 New Hampshire ROCs requesting updated information about infrastructure needs (water, wastewater, electric). The survey asked if the ROC was on public or private water, has elevated costs due to infrastructure repair/failure, and if the Board was willing to work with engineers and contractors through

construction. The survey generated 64 responses. The majority requested help with drinking water systems. Of the 64 responses, 19 identified only one system that needed repair and 45 identified problems with more than one system. Not all of these ROCs made it onto the final list, however, because some had access to other funding sources or did not sign a subrecipient agreement by the deadline.

### **Scoring Rubric for ROC Infrastructure Projects**

A scoring rubric was developed that is based on NH CDFA's scoring rubric for CDBG projects. The list identified 39 ROCs with \$103M in total need. The scoring rubric was applied to this initial list and will be re-applied and reviewed after an award is announced.

There is one difference between this scoring rubric and one that NH CDFA uses for CDBG funding and that is how need is assessed. The PRICE scoring rubric raises the importance of systems currently in failure and incurring increased operating costs, the need to repair more than one system, location in a distressed area, and unavailability of other sources of funding. The lack of ability to access other sources of funding is particularly important, as there are many ROCs that can't access USDA-RD and/or CDBG funding is not enough to cover the costs of repair.

Readiness and capacity are also of great importance. NHCLF's experience in partnering with ROCs with other projects has shown that a ROC's capacity can mean the difference between a project completed on time and one that will take much longer.

Lastly, this scoring rubric prioritizes drinking water systems over wastewater systems, and both over electrical systems. In July 2024, NHCLF will send out income surveys, with the requirement that the surveys be completed and tabulated by September 30, 2024.

### **Preliminary Scoring Rubric Description**

#### **Total Possible Points: up to 100**

#### ***Project Prioritization – Drinking Water over Wastewater over Electrical (15%)***

*Points awarded for each system identified as a need by ROCs in Survey Dated 4/4/24.*

*15 total points possible.*

- Public Water (4 pts)
- Private Water (4 pts)
- Septic (2 pts)
- Municipal Wastewater (2 pts)
- Electrical (1 pt)
- Willingness to submeter to promote conservation (2 pts)

#### ***Need (60%)***

*60 total points possible.*

- Systems currently in failure and incurring increased operating costs (10 pts)
- % LMI status (up to 25 pts)
- Location in distressed area (10 pts)
- Unavailability of other funding sources (up to 15 pts)
  - 5 pts per system for electric, water, and/or wastewater

**Readiness/Capacity (25%)***25 total points possible*

- Existing Engineering Report completed within the last five years (5 pts)
- Board Capacity to work w/ TA and engineers/construction crews (up to 20 pts)
  - Annual meeting records available? (5 pts)
  - Up to date on financial obligations (5 pts)
  - Regular board meetings (up to 5 pts)
  - Regular contact with TA (up to 5 pts)

**Threshold Criteria**

- Completed April 2024 Needs Survey
- Good Standing with Secretary of State
- Income Survey Completion Rate of 70%
- Contractual Relationship with NHCLF (current or willing to sign TA Agreement)

The list of ROCs to be considered for infrastructure repair with PRICE Act funding:

Co-Op Name	Town/City	County	# Units	In Distressed Area?	Project Need*	Estimated Funding Need
Bayview Village	Dover	Strafford	18		Wtr	\$1,058,000
Black Bear Village	North Conway	Carroll	247	Yes	Wtr Ww	\$17,723,000
Blackmount Acres	North Haverhill	Grafton	25		Wtr Ww	\$1,487,500
Brookside	Hill	Merrimack	21		Wtr	\$651,000
Camp Sargent Rd	Merrimack	Hillsborough	93		Wtr	\$2,081,000
Catamount Hill	Allenstown	Merrimack	153		Elec	\$1,738,636
Contoocook River	Deering	Hillsborough	98		Wtr Ww	\$4,371,000
Crown Point	Charlestown	Sullivan	15	Yes	Wtr	\$465,000
Deer Estates	Milan	Coos	20	Yes	Wtr	\$620,000
Elm Brook Village	Hopkinton	Merrimack	36		Wtr Ww	\$1,922,000
Freedom Hill	Loudon	Merrimack	148		Wtr Ww	\$6,346,000
Freedom Village	Concord	Merrimack	109		Wtr Ww	\$7,275,750
Friendship Drive	Salem	Rockingham	44		Wtr	\$1,364,000
Granite Estates	Derry	Rockingham	37		Wtr Ww Elec	\$1,881,955
Hideaway Village	Rochester	Strafford	81	Yes	Wtr	\$2,236,000
Lakeside	Enfield	Grafton	51		Ww Elec	\$1,013,045
Lilac Drive	Raymond	Rockingham	26		Ww	\$221,000

Co-Op Name	Town/City	County	# Units	In Distressed Area?	Project Need*	Estimated Funding Need
Litchfield Landing	Litchfield	Hillsborough	44		Wtr Ww	\$1,738,000
Medvil	Goffstown	Hillsborough	301		Wtr Ww	\$11,889,500
Mt. Washington Valley	Conway	Carroll	39	Yes	Wtr Ww Elec	\$3,214,932
Newfound Acres	Bristol	Grafton	21		Wtr Ww Elec	\$1,568,136
North Woods	Berlin	Coos	45	Yes	Elec	\$511,364
Oak Hill	Hinsdale	Cheshire	60	Yes	Ww	\$510,000
Ossipee Mtns	Ctr Ossipee	Carroll	107	Yes	Ww	\$909,500
Otarnic Pond	Hudson	Hillsborough	30		Elec	\$340,909
Paradise Ridge	Raymond	Rockingham	40		Elec	\$454,545
Parkland Estates	Litchfield	Hillsborough	33		Wtr Ww	\$1,303,500
Pine Gate	Plymouth	Grafton	34	Yes	Ww	\$289,000
Pine Hill	Conway	Carroll	28	Yes	Wtr	\$868,000
Poplin Estates	Fremont	Rockingham	57		Wtr Ww	\$2,251,500
Powder House	Exeter	Rockingham	48	Yes	Wtr Ww	\$5,284,000
Running Brook	Derry	Rockingham	24		Ww Elec	\$476,727
Sandy Pines	Lee	Strafford	12		Wtr Ww	\$974,000
Seacrest	Seabrook	Rockingham	191	Yes	Ww Elec	\$7,375,205
Souhegan Valley	Milford	Hillsborough	57	Yes	Elec	\$647,727
Stony Brook	Rochester	Strafford	129	Yes	Ww	\$1,096,500
Top of the Hill	Concord	Merrimack	24	Yes	Wtr Ww Elec	\$1,905,727
Two Rivers	Campton	Grafton	91		Wtr Ww Elec	\$5,128,591
White Rock	Tilton	Belknap	30	Yes	Wtr Elec	\$1,770,909
<b>TOTAL:</b>			<b>2,667</b>	<b>16</b>		<b>\$102,963,158</b>

\* Wtr = Water Ww = Wastewater Elec = Electrical

**Additional Funding:** While NHCLF does not anticipate capping awards for this program, it is likely that most projects will fall between \$1M and \$7M. Some Projects will involve a capital stack, with debt from the ROCs themselves, and when possible, grants from utilities, municipalities, and funds from a ROC's capital reserves (which would be the exception, not the norm). NHCLF has prioritized a ROC's need for infrastructure repair over the ability of the ROC to contribute matching funds through debt.

**Partner Coordination with NH CDFA:** As part of the coordination between the two organizations, NH CDFA will provide the following:

- Review draft structuring documents and provide feedback.
- Provide programmatic guidance related to HUD specific questions and HUD regulations.
- Provide support in the sub-applicant review process.
- Provide resources, such as the implementation guide and consultant list.
- Assist with developing monitoring procedures and monitor checklist templates.
- Provide ongoing review and feedback on program design and implementation.
- Assist with developing reporting structure and timelines.
- Provide consultant services for DRGR reporting.

**Internal Administration: Grant Program Director, Grant Administrator, and Community Project Specialist Positions.** The internal staff includes a **Grant Program Director** to support the implementation of PRICE awards. The person in this position will oversee the bidding process for engineering, budgetary, staffing, and overall management of the award and ensure organizational compliance with applicable regulations related to federal grants, including PRICE Act, contracts and subcontracts. This is a key hire, and NHCLF will announce this position as soon as PRICE Act funding awards are announced. NHCLF will seek an individual with knowledge of federal grant processes and related requirements, including but not limited to procurement, Disadvantaged Business Enterprise (DBE), National Environmental Policy Act (NEPA), and Davis-Bacon.

Supporting the Grant Program Director will be two **Program Administrators**. The Program Administrators will review proposed projects and assess suitability for PRICE grant funding; draft assistance agreements and work with ROCs and the ROC-NH team to ensure compliance with award agreements as it relates to reporting, financial management, performance monitoring, and conformance. The people in these positions will be experienced in managing federal awards for construction projects.

A new **Community Project Specialist** will work with the current **Community Project Specialist** to coordinate and assist with planning and managing ROC infrastructure projects by working with ROC Boards and committees, civil and other engineers, and contractors. The Community Project Specialists will monitor projects, in coordination with project engineers and contractors, so that all events, phases, and construction activities meet the deadlines. The Community Project Specialists will provide training resources to help ROCs develop long-term capital improvement plans and build self-sufficiency in communities by monitoring project-related budgets and meeting minutes. Finally, the Community Project Specialists will maintain a record of best practices and lessons learned for infrastructure projects and share that information with other practitioners across the country via ROC USA.

**Coordination of Homeowners and Engineers:** If awarded PRICE Act funding, NHCLF will immediately send out Request for Qualifications (RFQs) for **civil engineers** for project design, construction management, and oversight of the environmental review process. It is anticipated that this will be a three- to four-months' process. Once hired, civil engineers will manage the bidding process for construction work, including both infrastructure and new pads. The civil engineers will provide reporting about project progress and oversight that the work is conducted to HUD standards (BABA, Davis Bacon, Fair Housing Act, and Environmental Reviews). This information will be shared with the ROCs, NHCLF, and NH CDFA. It is understood that a minimum of three bids are needed for each project. From previous experience with ARPA funding and other major infrastructure projects completed (in general NHCLF helps coordinate one to two per year, with funding provided by USDA-RD, NH DES, CDBG), NHCLF and NH CDFA are confident that engineers and construction contractors can be efficiently secured for this effort.

**Monitoring and Reporting Structures:** NH CDFA will serve as a consultant to create monitoring and reporting structures based on their work with CDBG that captures all the required procurement procedures, including evidence of procedures being followed, and meet the guidelines outlined for labor standards, Fair Housing Act, and Environmental Reviews. The NHCLF Grant Program Director and Program Administrators will coordinate with civil engineers and ROCs to complete all semi-annual progress reports and final reports. NH CDFA will meet monthly with NHCLF, more if needed, to make sure that the work is being conducted under proper regulations and with appropriate efficiencies. NHCLF is currently reviewing grants management systems (with consultation provided by NH CDFA) to best manage the monitoring and reporting needed for PRICE Act projects.

**Technical Assistance for ROC Infrastructure:** The linchpin of this statewide effort, technical assistance (TA), will be conducted by the Community Project Specialists and other ROC-NH team members, including the Director of Organizational Training and Housing Cooperative Specialists. Technical assistance will begin before October 1<sup>st</sup>, with early-stage development of information and materials (flyers, fact sheets) to disseminate information about the grant program. After the award announcement, NHCLF will engage with each community likely to receive PRICE Act funds, with particular attention paid to ROC Board readiness.

Participation in all TA will be supported and maximized by providing in-person and remote connection options to help overcome barriers to physical participation. NHCLF has access to the Language Bank and has a Board approved Language Access Plan for translating services, as well as in-house technology for in-person, hearing impaired participants.

Technical Assistance will build upon the current ROC Operations program, which has been offered over the last decade to all NH ROCs. ROC Operations helps new and existing ROCs best manage their facilities, maintain their infrastructure, and plan for the future. Specific training modules include: Capital Improvement Plans, Creating an Annual Maintenance Calendar, Developing a Scope of Work for Competitive Bidding. Boot camp offers exposure to community partners and resources for collaborative maintenance. Approximately 50 ROC members representing 31 ROCs across the state have participated in this training.

TA also includes visioning sessions to identify a project's positive impact on the community, how to complete necessary documentation, including putting up Fair Housing Act posters, project milestones, and review project timelines to create buy-in and set expectations.

A bus tour for PRICE Act sub-recipient ROCs will provide in-person and firsthand experience of the existing infrastructure challenges and the opportunities created with the PRICE Act grant infrastructure funding. Invited on the tour will be ROCs, state and local officials, engineers, and NH CDFA.

To help ROCs that are not quite shovel-ready prepare for PRICE Act infrastructure funding, the NHCLF's Marketing & Communication Team and the ROC-NH team will make a video that can be shared with other ROCs across the state, and nationally. In 2021-2022, both teams recently coordinated to create videos on filling vacant lots and Board management. These videos were funded by USDA-RD.

The ROC-NH team will organize community celebrations with each ROC to commemorate infrastructure project milestones. Stakeholders will be invited and include local municipal government officials, project engineers and professionals, NH CDFA, regional Community Action partners, and technical assistance providers from NHCLF.

TA will be ongoing throughout the grant, aiming to strengthen ROCs by connecting the infrastructure work to complementary investments, such as renewable energy opportunities. In April 2024, NH Department of Energy was awarded \$43M from the EPA for Solar for All grants in NH, and it is anticipated that NH ROCs will receive between \$5-\$6M for solar arrays. Additional complementary efforts to infrastructure work will include accessibility improvements to individual homes, low or no-cost broadband access programs, and grant/loan programs for single-family housing improvements to address health and safety hazards. Community engagement will be supported by area Community Action Programs, USDA Rural Development Partners, NH Saves, NH DOE and from the FCC's Affordable Connectivity Program.

**Approach to Filling Vacant Lots—New Pads:** PRICE Act funding will help make it possible to install between 25 and 30 new pads at ROC communities within three years. ROCs selected for this list included ROCs that needed four or more pads; are located in areas that would most benefit from pad subsidy (making the home price affordable to families whose household income is 80% AMI or below); and has a ROC Board that is ready to work with a civil engineer, contractors, and ROC-NH staff to complete the work under all guidelines.

For this project, NHCLF has identified six ROC communities that fit the criteria. As a group, they contain 35 vacant lot sites. The cost of installing each new pad is estimated between \$15,000 and \$18,000. The project includes: design and permitting; lot excavation and pad site preparation; purchasing and pouring cement to create a pad that meets State of NH standards; sloping sides for proper draining and building a ramp for home delivery, with material used for a driveway after the home has been installed. In addition, funds will be used for new conduits from electric meter board to the slab with an extra wire for cable tv/internet, etc., and new water/sewer piping from the slab to community connections.

One civil engineer will be hired, through the required bidding process, to oversee the work of all the new pads. Through the RFQ process, engineers will have the opportunity to propose a team approach with sub-contractors as a means to encourage Disadvantaged Business Enterprises (DBE) participation in the project. The engineer will hire the contractors and ensure that all HUD regulations are followed. NHCLF PRICE Grant Directors and Program Administrators, along with ROC NH New Home Specialist, will review projects and compliance.

In New Hampshire, all manufactured homes affixed to land are titled as real estate and sold with deeds through the county registrar. To maintain affordability, deed restrictions will be filed with appropriate county registrars, mandating that homes sold on pads paid for with PRICE funding must be purchased by individuals/families with low incomes (80% AMI or below) for 15 years.

Proposed ROC communities for new pads:

- Colebrook Homeowner's Association, Colebrook, NH, 10 pads. Distressed Area (low income), engaged Board, water and sewer project in progress.
- Sandy Ridge Estates Cooperative, Ossipee, Carroll, NH, 5 pads. Distressed Area (low income), engaged Board.
- Brookview Mobile Home Park Cooperative, Groveton, NH, 5 pads. Distressed Area (low income), engaged Board, water and sewer infrastructure project in process.
- Acorn Terrace Cooperative, Rochester, NH, 6 pads. Distressed Area (low income).
- Sugar River Cooperative, Claremont, NH, 4 pads. Distressed Area (low income), water and sewer infrastructure upgrade in process.
- Contoocook River Cooperative, Deering, NH, 5 pads. Economically depressed county, engaged Board, rents are too high for additional debt and new homes with paying lot rents would help the community as a whole.
- Oak Hill Cooperative, Hinsdale, NH, 5 pads. Distressed Area (low income).

**Approach to Preserving Affordable Housing through the Preservation Fund:** In NH, it is a state law that when a manufactured home park goes up for sale, residents have 60 days to submit a competing offer, and the seller must negotiate with the residents in good faith. NHCLF's experienced TA team works with park residents throughout the process, with proven procedures in place involving park organizing and preparing residents to successfully operate a multimillion-dollar community. Homeowners vote to become a ROC, elect a Board, adopt Bylaws, community rules, policies and procedures. These newly formed ROCs work with NHCLF to complete property conditions reports and secure financing, and ultimately, to close on the transaction and become the owners. But with large parks competing with REITs, without access to low-cost financing, the dream of owning the land under their homes remains just that, a dream.

In the past ten years, the ROC team has successfully worked with 41 communities (3,130 homeowners) to become ROCs. The total acquisition price of these 41 ROCs was \$138M. But during this time, an almost equal number of homeowners were not able to purchase their communities, losing out to for-profit, primarily out-of-state buyers.

The Preservation Fund will make it possible to leverage additional private financing to purchase four to six parks during the grant period, leveraging upwards of \$60M. These parks would be unlikely to be able to purchase their communities without access to low-cost financing. These parks would be in addition to the four to six conversions that ROC-NH oversees annually. As a revolving loan fund, the Preservation Fund will help homeowners secure the land beneath homes and achieve all the benefits that ROC ownership provides. Total beneficiaries of this funding stretch well beyond the grant period, as this is a revolving loan fund, and will continue to help low-income homeowners in perpetuity.

It is anticipated that the Preservation Fund will be fully deployed and working in the field as soon as one year, no more than three years, after a PRICE Act grant award is announced.



**Approach to GAP Financing:** Gap Financing will be made available for PRICE Act grant sub-recipients and for ROCs that can access other funding, including USDA-RD, but run into unanticipated cost overruns. NHCLF's ROC-NH staff will work with ROCs to secure GAP financing, an essential tool to help ROCs make it over the finish line. Gap Financing will be administered by NHCLF staff and will serve as a revolving loan fund.

NHCLF anticipates that between 4 and 7 ROCs will access Gap Financing within the grant period. As mentioned in the Need section, Gap Financing serves as a risk mitigation strategy, and makes it affordable to overcome unanticipated cost overruns.

## **ACTIVITIES**

To meet the needs for preservation and revitalization of New Hampshire ROCs, the activities are concentrated in the following areas: Internal structures and working with sub-recipient ROCs, engineers, and partners.

### **Infrastructure to revitalize ROCs and preserve affordability**

Identify ROCs for infrastructure funding, new pads, and acquisition financing. NHCLF worked with NH CDFA to develop scoring criteria to prioritize ROCs most likely to be included in the first round for funding.

Partner Coordination with NH CDFA. NHCLF and NH CDFA gathered lists of civil engineers, and contractors, and planned outreach strategies for the new hires.

NHCLF and NH CDFA are researching management software systems to facilitate smooth monitoring and reporting of infrastructure projects, including billing, communication, and evidence that all work has been conducted according to guidelines. NHCLF anticipates having a grants management system in place within the first four months of the grant award.

After the announcement of the PRICE Act award, NHCLF and NH CDFA will provide support in the sub-applicant review process.

The Grant Program Director will work with NH CDFA to incorporate monitoring and reporting structures to meet deadlines and comply with all regulations, including grant close-out.

The ROC-NH team will consult with NH CDFA, as needed, to overcome project challenges, such as delays or compliance difficulties.

NH CDFA will provide ongoing feedback of project progress and review compliance throughout each project stage through closeout.

NHCLF will hire a Grant Program Director and Grant Administrators: The search process for these hires has already begun through preparing job descriptions and working with NH CDFA and others to identify sources of potential candidates with the right experience. After an award announcement, the positions will be posted. These hires will ensure smooth project management, on budget and on time, with minimal homeowner interference, and that compliance measures are met.

RFQs for Civil Engineers. Upon notification of an award, NHCLF will announce a RFQ for civil engineers for project design, management, and oversight of Davis Bacon, Environmental Reviews, BABA, and Fair Housing Act regulations. NHCLF anticipates this to be a four-month process.

Bidding Process for project-level construction: Estimated to be a three- to four-month process, this will be conducted by the civil engineers with oversight by NHCLF and NH CDFA.

Technical Assistance for ROCs receiving PRICE Act Funding. Prior to an award announcement, NHCLF will develop materials (flyers and online) to disseminate PRICE Act information. Project overview, timeline, and outcomes projected, will be developed for each ROC project.

NHCLF will meet with all ROCs that are anticipated to receive PRICE Act funds.

Hire a new Community Project Specialist. This position will coordinate and assist with planning and managing ROC infrastructure projects by working with ROC Boards and committees, civil and other engineers, contractors, municipal staff and municipal boards.

NHCLF will design TA modules to help ROCs that are not quite shovel ready in the first round of funding to become shovel ready. The TA will build upon the current ROC Operations training offered that trains new and existing ROCs to best manage their facilities.

Direct ROC Engagement. NHCLF will meet individually with all ROCs that are anticipated to receive PRICE Act funds.

Visioning sessions to identify the project's positive impact on the community, discuss challenges/solutions that may arise, and identify the participation required by neighborhood members for successful project implementation through completion.

Expanded programming for ROC Operations that include PRICE Act grant project information. ROC Operations training is held annually, sometimes semi-annually.

Bus tour. Organize a bus tour for sub-recipient ROCs to see firsthand experience of infrastructure challenges and success. Invite ROCs, state, and local officials, engineers.

Video. The video to help ROCs prepare for infrastructure work will be managed by NHCLF's Marketing & Communication Team and the ROC-NH team. The video will be shared nationally.

Community Celebrations. The ROC-NH team will organize community celebrations with each ROC to commemorate the achievement of project milestones achieved through the grant program. All stakeholders will be invited.

Ongoing Support. Throughout the grant, the ROC-NH team will host virtual information sessions where community residents can learn (from partners, and each other) about initiatives to complement the investment in their community's infrastructure improvements.

**Infill—New Pads, to create new affordable housing**. In the fall of 2024, ROC-NH staff, including the New Home Specialist will meet with ROCs likely to receive funding for new pads. The New Home Specialist will inform ROCs of affordability requirements of the 15-year restrictions for homes set on the pads. Information will be shared about available downpayment and closing cost assistance loans and fixed-rate, long-term mortgages.

The New Home Specialist will coordinate the civil engineers, contractors, and NHCLF PRICE Grant Program Director and Administrators.

**Preservation Fund—acquisition finance to preserve affordable housing**. The ROC-NH team will work with ROCs that need low-cost financing to purchase their parks. Standard and proven

conversion activities will be undertaken, from the beginning of the process through purchase. Activities include providing TA for voting to incorporate as a consumer cooperative, electing a Board, submitting a purchase and sales agreement, conducting a property conditions assessment, voting on Bylaws and community policies, to closing on the transaction.

**Gap Finance—to ensure affordability through project completion.** The ROC-NH team will work with ROCs that face unanticipated costs that will include providing ROCs with low-rate financing.

**TIMELINE**

Date	Key Activities
March 19,2024 through June 18, 2024	<p><b><u>Pre-Grant Submission Activities:</u></b></p> <ul style="list-style-type: none"> <li>• Scoring Rubric for PRICE Act priority ROCs</li> <li>• Public Comment</li> <li>• Identify ROCs for infrastructure funding</li> <li>• Identify potential new ROCs for the Preservation Fund</li> <li>• Identify ROCs for New Pads</li> <li>• Subrecipient agreements signed</li> </ul>
June 18, 2024 through September 30, 2024 (award announcement)	<p><b><u>Pre-Award Activities:</u></b></p> <ul style="list-style-type: none"> <li>• Technical Assistance for ROCs potentially receiving PRICE Act Funding</li> <li>• Partner Coordination with NH CDFA</li> <li>• Income Survey sent to 39 ROCs on the list.</li> </ul>
September 2024 through January 2025	<p><b><u>Post-Award Announcement Activities:</u></b></p> <ul style="list-style-type: none"> <li>• Hire the Grant Program Director and Grant Administrators</li> <li>• Hire a new Community Project Specialist</li> <li>• Review and Install a Grants Management System</li> <li>• RFQs for Civil Engineers</li> </ul>
September 2024 through May 2025	<ul style="list-style-type: none"> <li>• Meet with all ROCs that are anticipated to receive PRICE Act infrastructure funds.</li> <li>• Design TA modules to help ROCs that are not quite shovel ready in the first round of funding to become shovel ready.</li> <li>• Conduct an expanded ROC Operations program</li> </ul>
October 1, 2024 through May 2026	<ul style="list-style-type: none"> <li>• Create 2-4 New ROCs through the Preservation Fund, preserving affordable housing</li> </ul>
October 2024 through September 2028	<ul style="list-style-type: none"> <li>• Visioning Sessions</li> <li>• Ongoing TA support</li> </ul>
May 2025	<ul style="list-style-type: none"> <li>• Bidding Process begins for project-level engineers and contractors.</li> </ul>
May 30, 2025 through September 2026	<ul style="list-style-type: none"> <li>• Infill—New Pads</li> </ul>

Date	Key Activities
May 2025 through grant closeout	<ul style="list-style-type: none"> <li>• Compliance and Reporting</li> </ul>
September 2025	<ul style="list-style-type: none"> <li>• First shovels in the ground for infrastructure projects.</li> </ul>
October 1, 2025 through September 30, 2030	<ul style="list-style-type: none"> <li>• Gap Financing made available to preserve affordability</li> </ul>
Spring 2026	<ul style="list-style-type: none"> <li>• Video</li> </ul>
August 2026	<ul style="list-style-type: none"> <li>• Bus Tour</li> </ul>
Upon infrastructure project completion at each ROC	<ul style="list-style-type: none"> <li>• Community Celebrations</li> </ul>

**BUDGET INFORMATION**

The budget is based on prior experience with working with ROC infrastructure projects, creating new ROCs, and filling vacant lots.

The PRICE Act funds will provide the majority of the funding for this proposal. While the \$5M Preservation Fund will leverage upwards of \$60M in private capital (as evidenced by prior ROC purchases), the requirements for matching funds in this proposal are not possible at this time.

Similarly, it is expected that several ROCs will undertake debt financing to complete projects funded, in part, by PRICE Act funds, particularly through Gap Financing and projects that utilize other sources of funding, such as USDA-RD, CDBG, and NH DES. But because NHCLF is prioritizing need over a ROC’s ability to provide matching funds, and reserving Gap Financing funds for the most in-need situations, for the purposes of the budget, NHCLF will not be listing matching funds by individual ROCs.

The budget includes all staffing required to complete PRICE Act activities, including the new hires, the Grant Program Director and Grant Administrators. The salary ranges for these positions are based, in part, on NHCLF’s management of a USDA grant, where similar positions are in place for project oversight and construction management.

Travel costs are based on average airfare, car and hotel rental, meals and other associated travel costs anticipated over five years and include inflation. Three staff members per year will travel out of state to report their work on PRICE Act projects to other practitioners. The project’s personnel, fringe, travel, supplies and indirect costs are \$5.35M or 7.1% of the total budget.

NH CDFA consulting costs are 1% of the total grant request, or \$750,000, and listed under Consultants/Grant Management.

The Marketing and Outreach Budget, at \$45,000, includes \$25,000 for a video that is designed to help ROCs become ready for infrastructure projects. The remaining funds are outreach activities

NHCLF is reviewing grants management and reporting systems, with our IT consultants Craftsman and ATX, to facilitate monitoring and reporting of infrastructure projects, including billing, communication, and documenting evidence that all work has been conducted according to guidelines.

The infrastructure work at ROCs, at \$60M, and new pads, at \$500,000, are listed on the Sub-Grantee lines, as the ROCs will be sub-recipients of PRICE Act funds.

The Preservation Fund and Gap Financing are listed under Other Direct Costs.

### **PROJECTED IMPACT OF ACTIVITIES**

An award from the PRICE Act is a life changing opportunity for low-income homeowners. The ROCs on the list have long suffered with costly, at times dangerous infrastructure systems. PRICE Act will make significant, long-term differences in the following ways:

Infrastructure Projects. Water & Sewer: Upgraded water and sewer systems mean less wastage and increases a ROC's affordability. Of the ROCs on the list, 26 need upgraded water systems, 25 need sewer repair, 14 need electrical upgrades, and 21 have a problem with more than one system.

The infrastructure upgrades will positively impact between 15 and 18 ROCs in New Hampshire impacting between 1,500 and 1,650 low- and moderate-income homeowners.

- Less water wastage saves money and helps with a ROC's financial security over time.
- Repaired leaks mean improved water quality outcomes (safer drinking water) and conserves water.
- Repaired roads and stormwater infrastructure involving Low Impact Development techniques (e.g., creating swales that allow for vegetation channels to filter runoff) results in better overall drainage and protects water quality.

An example of the savings obtained when a ROC improves their water and sewer systems is Gaslight Village in Tilton. This 29-site ROC replaced a distribution system and converted from septic systems to municipal sewer in 2017. Prior to replacing the water distribution system, water bills averaged \$3,512 per quarter when the system was leaking (as high as \$14,048 annually). After the distribution was replaced, the annual water costs dropped by almost half, to \$7,587.

Electrical Upgrades: Of the ROCs on the list, 14 are in need of electrical upgrades. These upgrades will accomplish the following:

- Reduce fire hazards by addressing low lines, improperly protected electric service lines, either exposed above ground or without conduit, directly buried below ground, or both. In addition, electrical upgrades will repair dilapidated meter backboards or electrical poles and replace corroded meter receptacles.
- Reduce other hazards by ensuring that meter receptacles and service disconnects are within the proper allowable distance from homes, be properly labeled, be accessible in the event of an emergency, and eliminate infiltration from water, rodents, and debris.

Completed Infrastructure Projects through Gap Financing. ROCs will be able to access low-interest rate financing in the case of unanticipated cost overruns. This financial product will impact between 4 and 7 ROCs.

Community Engagement through TA (visioning sessions, ROC Operations program, bus tour, celebrations) offers opportunities to work together and deepen ties. NHCLF community engagement activities are designed to engage the whole community, not just ROC Boards.

Affordable Housing Preserved: Acquisition financing, or the Preservation Fund will preserve between 4 and 6 manufactured home parks, including 500 and 800 affordable homes. Once these communities become ROCs, they can partake of the many long-term benefits:

- Risk of displacement from land sale is eliminated.
- Control over monthly lot rents and community policies (through membership votes).
- Ability to access fixed-rate, long-term mortgage financing through NHCLF's single-family mortgage program, Welcome Home Loans.
- Access to leadership training opportunities through NHCLF.
- Ability to reinvest back into the community's infrastructure through capital reserves, or funding sources such as USDA-RD, NH DES, CDBG, or PRICE Act funds.

New Homes Sited: New pads poured will help offset the high costs of putting in new homes. Between 25 and 30 new homes will be sited. All new homes set will be Energy Star-rated, or higher, with the goal being to set Net Zero Energy Ready Homes as they become available in New Hampshire. All the homes will be made available to families with low incomes for a minimum of 15 years.

## **AFFORDABILITY & EQUITY**

### **Ensuring availability of affordable MH options to LMI households**

ROCs are naturally occurring affordable housing communities and, in addition, are often naturally occurring retirement communities due to affordability and the single-story floor plans of manufactured homes. Over the entirety of the 40 years NHCLF has been working with ROCs, income levels have remained steady. Nearly 80% of homeowners living in ROCs are at or below 80% AMI, with 50% that are very low or extremely low: 29% of ROC homeowners have incomes that are between 30% and 50% AMI, and 21% are below 30% AMI. Affordability in ROCs is largely determined by type of housing stock—manufactured homes being the most affordable housing in the state as evidenced by single-family home prices:

- In FY23, the average loan for NHCLF's Welcome Home mortgage program was \$106,008 for a manufactured home in ROCs (95% LTV) while the average single-family home in the state cost \$470,000.
- Manufactured homeownership in a ROC is less expensive than renting. Owning a manufactured home can save \$460 per month over a two-bedroom apartment.

When manufactured homeowners form ROCs and purchase their land, residents have the ability to control their monthly lot rents and choose their financial futures. ROCs democratically elect their own Boards and vote to increase monthly lot rents and fees in order to reinvest in their communities through repairing and upgrading infrastructure for long-term health, safety, and cost benefit. When possible, ROCs add new homes through filling vacant lots, adding to the affordable housing supply and to monthly lot rents.

- Market studies commissioned by ROC USA (Colliers) show that monthly lot rents are at or below market lot rents. Lot rents in ROCs increase an average of 1% per year versus 3.9% per year at investor-owned parks.
- An example of low lot rent in New Hampshire is Greenville Estates. In the last 15 years they have raised their monthly rent a total of \$60 and have current lot rent of \$325. The annual HUD Fair Market rent report shows that Hillsborough Country's current average fair market rent for manufactured homes is \$557.

Despite the misnomer that manufactured homes don't appreciate, a 2006 UNH Carsey Study shows that manufactured homes in ROCs do appreciate, an average of 12% more than at an investor-owned park. ROCs are popular with buyers. The Carsey study also showed that homes sell more quickly in ROCs than in investor-owned parks.

No incentive to sell or close the community: Since NHCLF started the ROC model, not one ROC in New Hampshire has dissolved, all 149 are up and running. Selling a ROC is disincentivized in ROC Bylaws. ROCs in New Hampshire are formed as Consumer Cooperatives and adhere to state law RSA 301A. This means that if the ROC is sold, members would walk away with only their membership fee. Any proceeds/surplus of the sale would be distributed to another cooperative or non-profit organization.

Primarily because of NHCLF's solid 40-year history, NHCLF assumes that ROCs in New Hampshire will have a 30-year affordability. This is true of the ROCs on the list for PRICE Act infrastructure.

To maintain affordability for the **25 to 30 new pads (infill)**, NHCLF will file 15-year deed restrictions with county registrars, requiring that homes set on pads paid for by PRICE Act funds must be purchased by an individual or family with low incomes (80% AMI or below), during the 15-year restriction. To ensure this is followed, NHCLF will work with individual ROCs to understand what deed restrictions are. In addition, NHCLF will keep records of all home sales of these pads.

Families and individuals with low incomes that purchase a home that sits on a new pad created by PRICE Act funding will be able to access fixed-rate, long-term financing through NHCLF's Welcome Home Loan program. Further, low-income homeowners can access downpayment and closing cost assistance through NHCLF's Housing Assistance Loans (HALs). These are 0% sleeper loans and are only paid back when the first mortgage is paid in full or refinanced. HAL loans can be for upwards of \$35,000 for a new home and can make a big difference to helping a family with low income become homeowners. In the last three years, NHCLF has made 69 HAL loans for a total of \$413,440 and the loss rate is 0%.

### **Protections in Place for Residents**

Notice of Rent Increases: Any rent increases are voted on by the membership and is one of the inherent keys to ROC success. It is in the interest of membership to keep lot rents as low and affordable as possible. For rent increases, New Hampshire ROCs must inform their membership by providing at least 60 days' notice and hold a vote of membership (in accordance with state statute, NH RSA 205A, that states no charges may be increased by the ROC without an explanation for the increase and specifying the date of said increase, which shall be no less than 60 days after written notice to the ROC member.) This exceeds Fannie Mae and Freddie Mac policies, which are 30 days' notice.

Can sell their home at any time: New Hampshire statute, RSA 205A, prohibits denying any resident of a manufactured housing park the right to sell at a price of a resident's choosing or require the resident or purchaser to remove the manufactured housing from the park on the basis of the sale.

Homeowner's Rights to Occupy Lots: When an applicant is interested in living in a ROC, they apply for membership and are provided a copy of the Occupancy Agreement, the ROC's Bylaws,

and the Community Rules. Article 2 of the Occupancy Agreement states that members shall have a perpetual right to occupy their lot, if they abide by the Bylaws and Community Rules.

Sub-lease: In general, ROC Bylaws prohibit members from renting or subleasing their homes because 1) each home equals one vote, and 2) a community desire for the homes to be occupied by their owners, not outside owners for short-term vacation rentals. However, a workaround exists in the case of hardship. In these situations, a member can request a short-term, sub-lease with conditions and a timeline approved by their ROC's Board.

No incentive to sell or close the community: As mentioned above, not one ROC has sold, dissolved, or "failed" since the ROC program started in 1984. As intrinsic to the ROC cooperative model, the risk of displacement is eliminated.

Fair Housing Act: ROCs' Bylaws state on the first page that membership eligibility is defined without regard to their social, political, racial, color, national origin, religion, age, sex, sexual orientation, physical or mental disability, or familial or marital status. The last page includes the International Cooperative Principles, the first of which is a pledge to maintain Voluntary and Open membership without gender, social, racial, political, or religious discrimination. This information is also clearly stated in New Member Applications.

**Encouraging access to resources and financing for underserved communities and persons:** People with disabilities make up nearly 25% of total New Hampshire ROC membership (self-reported income surveys). Many people choose manufactured homes because they are easily ramped, offer single floor living, and are affordable. ROC living can be especially attractive because of greater community engagement (Board and committee opportunities, as well as other social groups).

At Sleepy Hollow Co-op, in Newmarket, NH, the Board makes sure that a hearing-impaired husband and wife can participate in membership meetings. The ROC regularly hires ASL professionals for interpretative services.

ROCs' Bylaws state on the first page that membership eligibility is defined without regard to their social, political, racial, color, national origin, religious, age, sex, sexual orientation, physical or mental disability, or familial or marital status.

NHCLF as an organization encourages access to resources and financing, especially for underserved communities and individuals. NHCLF does not discriminate on the basis of race, creed, gender, national origin, sexual orientation or physical disability. NHCLF believes that gender and class diversity are important to strengthening the quality of our work. This is because the people served by the NHCLF are most often people who are low-income: homeowners in ROCs, small business owners seeking help and loans to improve their businesses, or single parents and families saving up for a down-payment for a home.

In order to better help people with disabilities access NHCLF financial products and training, NHCLF offers in-person and remote options for most training sessions and can provide ASL when needed. ROC-NH staff and Welcome Home Loan team regularly make site visits in case of transportation problems. NHCLF's main building is fully wheelchair accessible. Trainings and TA concerning PRICE Act projects will be supported by in-person and remote connection options to help overcome barriers to physical participation.



In the PRICE Act funded activities, there will be opportunities to benefit people with disabilities to add ramps to new homes on the new pads. The infrastructure work helps with park drainage, and sloping, improving yards and driveways from excess water runoff.

ROC Boards themselves receive training that includes a review of the Fair Housing Act standards from the ROC-NH Training Team. All ROC members have access to a virtual Fair Housing Training through ROCKET, a training platform run by ROC USA.

- ROCs also receive ongoing technical assistance through ROC-NH which may include continued training and support on upholding Fair Housing Act requirements in their communities.
- ROCs conducting membership orientations with prospective new members of the community are required to display the Fair Housing logo in the room where the meeting is taking place.

Despite the relatively small percentage of minority groups in the state, NHCLF makes sure that language is not a barrier to access financing and training, especially for New Americans. NHCLF uses the Language Bank, a nonprofit enterprise providing in-person interpreters with more than 60 languages, and written translation for more than 150 languages.

And ROCs themselves have been successfully bridging the language gap. At Friendship Drive Co-op in Salem, NH, where there are 44 homes, there are five New American households. The New Americans include two families from Pakistan, a family from Portugal, a family from Vietnam, and a family from the Dominican Republic. A close-knit community, members of Friendship Drive make sure to include all families in meetings and events. They explored having an interpreter who spoke Urdu attend an important membership meeting, but the family preferred to have their English-speaking children attend and help with interpretation. Recently, the Board president worked with the Portuguese family as a liaison with the Community Action Program to successfully enroll the family in a weatherization program to receive a new oil burner.

Another example is Crossings at Sleepy Hollow Co-op, in Newmarket, NH, where there are eight Laotian families. Most of the adults speak only Lao, but a couple of English-speaking family members attend membership meetings and share information. These families have attended co-op potluck social events and the recipes they share from Laos are a community favorite.

Financing: All homeowners who live in ROCs have access to NHCLF's single-family mortgage products through NHCLF's Welcome Home loan program. NHCLF is an equal opportunity provider, employer, and lender. NHCLF is committed to complying with federal requirements in providing free, meaningful access for limited English proficiency (LEP) persons and organizations. No LEP person will be denied access to a NHCLF program because the person does not speak English or communicates in English on a limited basis.

Opportunities for low-income individuals: NHCLF's Board must consist of 33% of the constituency it serves. NHCLF always has at least one, often two or three, Board members who also are ROC members. NHCLF staff also includes people who currently live in ROCs (currently two) and have lived in ROCs previously and support the ROC enterprise model.

ROCs in New Hampshire mean access to long-term, fixed-rate financing through NHCLF's Welcome Home Loan program (61% are 80% AMI or below). For those that used downpayment and closing cost assistance funds, 98% are 80% AMI or below, with 30% below 50% AMI.

Direct opportunities for employment for people with low-incomes in PRICE Act funded projects: There will likely be many opportunities to hire people with low-incomes for all construction phases for water, sewer, and for setting new pads.

## **ENVIRONMENT & RESILIENCE**

### **Significant Hazards in Project Area**

The National Oceanic and Atmospheric Administration (NOAA) describes New Hampshire as such: Cold snowy winters and mild summers; not regularly affected by tornados or earthquakes; likely that temperatures will rise over the next century. The New England 4<sup>th</sup> National Climate Assessment identifies precipitation as the greatest climate hazard within the state.

### **Flooding from severe storms**

For the ROCs on the New Hampshire PRICE Act eligibility list, 11 are in flood zones (National Flood Hazard Layer map, FEMA). Because of their location, and combined with their aging infrastructure, these ROCs are vulnerable to road washouts and water contamination, as well as home and underground storage tank damage from flooding.

Enhanced resilience through infrastructure projects: When ROCs undertake an infrastructure project, it is often a chance to repair poorly graded and sloped roads, create swales, and incorporate other Low Impact Development measures. As a result, overall drainage in the ROC improves, stormwater can be better managed, and along with repaired water and sewer, these measures can improve water quality outcomes.

Infrastructure projects also provide an opportunity for environmental remediation, removing old underground tanks, both oil and kerosene.

Power outages from storms: A common hazard that all ROCs in New Hampshire face are power outages caused by ice storms or trees laden with wet, heavy snow. Evidence supports this: 83% of major power outages between 2000 and 2021 in the United States were attributed to weather-related events. The average annual number of weather-related power outages has increased by almost 80% since 2011 (Climate Central).

Reduced susceptibility to weather-related power outages: Infrastructure work, particularly as it applies to electrical, can remove trees and branches that might interfere with lines, and can involve bringing overhead wires underground for increased reliability. Upgraded electrical work can help reduce the risk of fire at homes. Further, ROCs can be upgraded to Phase III power, which positions the community to install solar arrays.

Community Connection to Overcome Effects of Severe Storms: NHCLF has been helping ROCs navigate weather-related hazards, such as severe flooding and multi-day power outages (sometimes longer), through the encouragement of creating community centers. Community centers vary in size and construction. Some are former homes and garages, while others are larger buildings with kitchens and space for birthday parties and other events. Many ROCs invest in community centers, which can serve as warming or cooling stations, as well as central axis

points for emergency personnel, volunteers, and food delivery. NHCLF has found that community centers are important for overall community engagement.

Infrastructure projects conducted at ROCs will help better position a community financially (through less resource waste and increased savings) that can lead to the building of community centers.

**Activities to address the current and future threat of natural hazards, extreme weather, and natural events.**

PRICE Act funds will help low-income homeowners weather extreme weather hazards.

Weather resistant and climate-appropriate materials: New homes installed on pads will be Energy Star-rated, or more, with a goal installing Net Zero homes as they become available. Energy Star-rated homes offer greater energy savings with improved windows, insulation, and energy efficient appliances, helping to keep the heat in during colder months and the heat out during the summer months. PRICE Act funding and NHCLF financing, downpayment and closing cost assistance will help LMI families access new energy-efficient homes.

Connecting to Renewable Energy: ROCs engaged with electrical upgrades in PRICE Act funded projects can install three-phase power. This will enable the ROC to access renewable energy through onsite solar arrays. As mentioned earlier, the NH DOE has received a \$43M Solar for All grant and is expected to award between \$5M and \$6M to NH ROCs. The PRICE Act funding will help ROCs meet the electrical infrastructure requirements that they will need for EPA-funded, community solar arrays. Accessing renewable energy will reduce annual electricity costs.

Removing underground oil tanks: NHCLF has worked with many ROCs that have underground storage tanks (UST), both oil and kerosene. The tanks, when negatively affected by flooding, can pose a hazard to community water sources, area streams and water systems. Infrastructure projects at ROCs present an opportunity to remove these tanks. Once the tanks are removed, threats to the environment are mitigated, and in addition, it helps eliminate potential soil contamination risk and sets the community on a healthier and safer path.

**Advancing environmental justice**

There are multiple Justice 40 communities scattered throughout New Hampshire, according to the Climate and Economic Justice Screening Tool. Of note, there are 21 Superfund sites in the state and New Hampshire is ranked in the upper half of communities at risk of flooding (EPA Environmental Justice Screening Tool).

While the ROC membership reflects the demographics of the New Hampshire, New Americans and BIPOC, though small in number, are beneficiaries of PRICE Act funded projects. People with disabilities are 25% of the New Hampshire's ROC population. The goals and activities of this proposal will enable low-income homeowners, including New Americans and people of color, to benefit through the repairing of years' worth, often decades, of deferred maintenance inherited from former private owners.

1. Improved protection and resilience from flooding and power loss due to storms: Infrastructure projects will incorporate Low Impact Development techniques to improve runoff and drainage issues. When possible, electrical systems will be undergrounded and trees and branches removed to reduce breakage from storms with heavy snow or ice.

2. Reduce exposure to environmental and health hazards: Infrastructure work will make it possible to remove underground oil and kerosene tanks, when needed (through additional funding sources from NH DES and NH state demolition funds) reducing contamination of soil and water, including rivers and streams.

Water and sewer repair will improve water quality for low-income homeowners through upgrading aging and leaking water and sewer systems that are prone to contamination (less likely to experience E. coli bacteria and experience boil orders).

Projects will reduce fire hazards by addressing low lines, improperly protected electric service lines, either exposed above ground or without conduit, directly buried below ground, or both. In addition, electrical upgrades will repair dilapidated meter backboards or electrical poles and replace corroded meter receptacles.

Projects will also reduce other electrical hazards by ensuring that meter receptacles and service disconnects are within the proper allowable distance from homes, be properly labeled, accessible in the event of an emergency, and eliminate infiltration from water, rodents, and debris.

Overcome prior disinvestment in environmental infrastructure: The entirety of the infrastructure work in ROCs addresses deferred maintenance either from previous investor owners or lack of funding resources. PRICE Act is a lifechanging opportunity for ROCs to repair leaking water systems, upgrade sewer systems, reduce water contamination, remove environmental hazards such as underground oil and kerosene tanks, and better control water runoff from storms.

## **COMMUNITY ENGAGEMENT**

The primary activities related to constituents for outreach and feedback as related to PRICE Act funded efforts will be with homeowners with low incomes in ROCs, that include BIPOC, New Americans, and homeowners with disabilities. Community engagement is foundational to NHCLF's long-standing work with ROC Boards and membership, and in turn, to ROCs' long-term success. NHCLF looks forward to engaging with ROC Boards and membership through PRICE Act infrastructure projects, filling vacant lots, and helping manufactured homeowners buy their land and enjoy all the benefits ROC ownership entails. Community engagement will be ongoing throughout the PRICE Act grant period.

NHCLF as an organization encourages access to resources and financing, especially for underserved communities and individuals. NHCLF does not discriminate on the basis of race, creed, gender, national origin, sexual orientation, or physical disability. NHCLF believes that gender and class diversity are important to strengthening the quality of our work.

Community engagement efforts will be supported by providing in-person and remote connection options to help overcome barriers to physical participation. Language Bank resources will be used for translating services, as needed, as well as in-house technology for in-person and hearing-impaired participants.

For ROC residents, NHCLF will:

- Seek feedback through surveys, one-on-one interviews, and group meetings with NHCLF ROC-NH staff throughout the process. ROC members and leadership have ready access to the ROC-NH team, ROC2ROC (a statewide organization made up of ROC leaders), which will be kept informed about the PRICE Act grant and projects' progress.

- Address project challenges. NHCLF will work with ROC Boards and membership to address project challenges (such as delays or interference with daily living) and steps needed to overcome these challenges.
- ROC Operations, a program offered over the last decade, provides an excellent forum to engage with ROC leaderships and membership on a deeper level about the project's impact on their facilities, listen to concerns about how to maintain that infrastructure, and plan for the future.
- Visioning sessions to identify a project's positive impact on the community and respond to concerns about project interruption and how to complete necessary documentation, including putting up Fair Housing Act posters, track project milestones, and review project timelines to create buy-in and set expectations. Translators will be made available as needed, including ASL.
- Bus tour for PRICE Act sub-recipient ROCs to provide in-person and firsthand experience of the existing infrastructure challenges and the opportunities created with the infrastructure grant project. ROC communities, state, and local officials will be invited. The bus tour will be an excellent opportunity to share questions and provide feedback.
- Community celebrations with each ROC to commemorate the achievement of project milestones achieved through the grant program. Translating services, including ASL, will be made available as needed.

Engaging with Local and State Government officials: NHCLF will invite local and state government officials on the bus tour to show the impact of PRICE Act funding. Local and state government officials (as well as New Hampshire's congressional delegation) will be invited to area community celebrations.

Engaging with Engineers and Contractors: Throughout the project, NHCLF will coordinate ROC Boards and with engineers and contractors to mark progress, monitor that proper procedures are being followed, and overcome problems. If there are language barriers, NHCLF will employ the Language Bank and ASL translating services as needed. Engineers and contractors will be invited to community celebrations.

For the new pads: through the RFQ process to hire a civil engineer, NHCLF will offer the engineers the opportunity to propose a team approach with sub-contractors as a means to encourage Disadvantaged Business Enterprises (DBS) participation in the project.

For preserving affordable homes acquisition: NHCLF works with low-income homeowners trying to purchase the land beneath their homes and preserve their communities throughout the ROC conversion process—from electing a Board, submitting a purchase and sales agreement, and engaging with engineering firms for due diligence, closing the transaction, and providing ongoing TA.

### **Alignment with existing community plans and policies**

NHCLF's PRICE Act proposal aligns with several existing plans, including the State of New Hampshire's Consolidated Plan, and three Comprehensive Economic Development Strategies (CEDs), including Strafford CEDs, North Country Council CEDs, and the Central/Southern Regional CEDs.

### NH Consolidated Plan

- Priority Need 2—Gaps in public infrastructure. CDBG is the primary federal source funding in New Hampshire to meet non-housing needs. High priority infrastructure activities include water and wastewater lines.
- Priority Need 4—Housing grants: Activities in relation to improvement of housing are high priority for NHCLF PRICE Act partner, NH CDFA. These funds are sometimes leveraged with weatherization funds and/or lead funds to stretch resources and complete more comprehensive retrofits. In addition to traditional housing rehab activities, NH CDFA provides funding for infrastructure in support of housing.
- Goal 5—Housing: Expand affordable housing opportunities and improve the housing condition of low-and-moderate income households.
- Goal 8—Infrastructure and Community Facility Needs: Address gaps in public infrastructure and community facilities.
- Goal 9—Capacity: Build capacity of New Hampshire’s cities and towns to adapt and respond to changing community development and housing needs.

### Strafford CEDS

- Goal 1-3 Housing—Encourage fair housing practices that make it possible for workers to have the option to come to live or stay in our region. Prioritize safe, secure, and affordable housing for all, regardless of race, color, national origin, or income. Strengthen the economic vitality and resiliency of communities through effective and inclusive planning practices and regional collaboration.
- Infrastructure Goal 1—Improve the resilience of infrastructure.

### North Country Council CEDS

- Goal 2: Sustain a culture of honoring and protecting the people, heritage, and landscape of the region by improving the human systems that strengthen our regional economy by promoting creative housing options that are safe, diverse and desirable.
- Goal 3: To protect the natural capital of the region. Encourage development activities to identify opportunities to reduce and mitigate environmental impact through practices such as low-impact development designs, reduced and context appropriate lighting, and use of renewable energy resources.
- Goal 4: To provide support for business development, and innovation that supports workforce training, opportunity, livable wage, and work-life balance by aiding municipalities, business, and organizations in accessing or expanding water and wastewater systems.
- Goal 6: To understand income and equity disparities in the region, create plans for an inclusive environment with access for everyone, and measure progress over time by ensuring equitable access to basic needs to sustain life are available across the region, including access to housing.

### Central/Southern Regional CEDS

- Goal 2: Facilitate opportunities to develop, maintain and strengthen adequate hard and soft infrastructure for business development. Objective: Facilitate the expansion and maintenance of key infrastructure, including but not limited to water and sewer.
- Goal 4: Identify and secure investments to implement the CEDS.

- Goal 6: Support efforts to maintain an adequate supply of housing that meets the needs of the workforce.

**EXHIBIT E: Capacity**

New Hampshire Community Loan Fund



## **CAPACITY: EXPERIENCE**

### **Infrastructure Projects**

NH CDFA oversees the application, scoring, award, and implementation of CDBG projects (ranging from housing to public facilities/infrastructure upgrades/construction) twice a year across the state of New Hampshire. NH CDFA averages eight projects per round with maximum awards typically around \$500,000 per project.

NH CDFA provides guidance and resources to grantees and sub-recipients to support them in managing community development projects to HUD standards. This work includes:

- Technical assistance through pre-construction, implementation, and post-construction/closeout. Meetings are held both remotely and on-site to provide support for grantees and sub-recipients throughout the project timeline.
- Engaging with consultants and partners to increase proficiency and effectiveness internally and externally through trainings, evaluations, project management systems improvements and capacity building.

NHCLF assists ROCs throughout the lifecycle of infrastructure projects in their communities. Since 2000, NHCLF has helped dozens of ROCs obtain more than \$43M of USDA-RD, NH DES, and CDBG financing to complete their projects. Projects have included water and sewer upgrades and replacements, upgrading roads, and electrical upgrades. Starting in 2022, NHCLF assisted 31 ROCs to access \$30M in American Rescue Plan Act (ARPA) funds to help improve their communities. This lifecycle assistance includes:

- Assist ROCs in the application process of USDA-RD, NH DES, and CDBG projects for ROC infrastructure.
- Coordinate ROCs with engineers and contractors.
- Provide project financing, usually through refinancing of mortgages, to help complete projects and manage payments. NHCLF has made 45 loans totaling \$28.2M.

NHCLF is currently administering two grant programs on behalf of USDA to support expanded meat and poultry processing capacity across the country via construction, equipment purchases, and increased staffing. Across both programs, NHCLF will provide up to \$191M in funding to approximately 150 subrecipients and support them over the next five years in ensuring they obtain appropriate engineering, architectural, and construction permitting while also adhering to applicable Federal grant requirements like BABA, Davis Bacon, and NEPA.

NHCLF will procure for-profit entities in the scope of work funded by the PRICE Act, primarily engineering and construction contractors to design and implement projects.

### **Filling Vacant Lots**

In the last three years, NHCLF has helped 96 families to become homeowners in housing through filling vacant lots. This work often involves demolition of uninhabitable homes, removing blight and allowing for new homes to be set. In the last two years, NHCLF helped ROCs to access state demolition funds (through InvestNH Municipal Demolition Grant, NH Dept. of Business and Economic Affairs), totaling \$261,113, which removed 20 uninhabitable homes.

**References from Clients:**

Philip A. Corbett, Project Manager, CMA Engineers. Contact information: 1 Sundial Avenue, Suite 510N, Manchester, NH, 03103. 603-627-0708: “CMA Engineers was retained by Hollis Pines Cooperative to design a new water treatment building and upgrade their water system. To fund this project, we are using a combination of ARPA funds and funding from the NH DES to make repairs and improvements to their water system. During this time, the ROC-NH Team has been integral in providing technical assistance to the Hollis Pines Cooperative board, and we fully support the NHCLF PRICE Act grant application.

Leslie Williams, President, Woodbury Cooperative. Contact information: 1338 Woodbury Avenue, Portsmouth, NH, 03801. “Without the experience, knowledge, and support of the NH Community Loan Fund and our ROC-NH technical assistant, upgrades to our water, wastewater and road systems, as well as filling six vacant lots, wouldn’t have been possible. We are now a more beautiful and sustainable community.”

Marla Tripp, Board Secretary, Fisherville Cooperative. Contact information: 107 Fisherville Road, Concord, NH, 03301. Project: \$1.3M wastewater and road project in 2013. “The support of the NH Community Loan Fund was so helpful during our water, wastewater, and road systems project. It wouldn’t have been possible. This work has resulted in safer drinking water and more financial stability for our coop in the form of lower water and sewer bills and lower plowing bills because of the newer roads.”

**Experience with Grant Funds**

NH CDFA has broad experience in managing and expending grant funds across multiple programs: CDBG-CVPS (CDBG Covid 19 Public Service Pilot program); CCIP (Community Center Investment Program funded through US Treasury/SLFRF); CDBG Microenterprise Program (direct equipment grants, TA support, program activity costs); CDBG Housing and Public Facility grants.

NHCLF has received 81 Federal awards since 1997, totaling over \$247 million from six different Federal agencies across multiple programs. NHCLF has successfully achieved full compliance, meeting all compliance examinations, performance measures and financial and reporting requirements. The annual results of NHCLF’s Single Audit reports have been clean and compliant for each Federal award it has managed.

Challenges Experienced include modifying project budgets; extension requests from projects, usually related to implementation issues; managing compliance issues ranging from procurement to labor standards and environmental reviews.

Challenges Mitigated through request review/approval process regarding extension/budget changes; increased TA assistance and streamlined guidance development; increased internal training and collaboration with key consultants.

**Key Staff:****NH CDFA:**

**Katy Easterly Martey**—NH CDFA Executive Director

- Oversees key partnership contract reviews

**Mollie Kaylor**—Director of Housing and Community Development

- Provides programmatic feedback and guidance related to
  - PRICE application
  - PRICE program design
  - PRICE program implementation

**Chris Monroe**—Senior Community Development Manager

- Provides feedback on compliance and implementation standards
- Provides assistance in PRICE application and program design.
- Provides TA and guidance as needed.

**NHCLF:****Sarah Marchant**—NHCLF Chief Operating Officer & VP ROC-NH

- Oversee key partnership contract reviews.
- Review PRICE Act program design and implementation.
- Oversee new ROC creation through the Preservation Fund.

**Jeannie Oliver**—Director of ROC-NH

- Review PRICE Act program design, implementation, project challenges.
- Oversee new ROC creation through the Preservation Fund.

**Chris Clasby**—Director of Acquisitions and ROC lending

- Manage new ROC creation and Gap Financing for infrastructure projects.

**PRICE Act Program Director (to be hired)**

- Oversee bidding process for engineering, budgetary, staffing.
- Compliance

**Program Administrators (to be hired)**

- Project review, assistance agreements, monitoring, conformance.

**Michelle Stevens**—Community Project Specialist**Community Project Specialist (to be hired)**

- Coordinate ROC Boards, civil engineers, contractors.
- Monitor progress, project milestones.
- Provide TA and help ROCs develop capital improvement plans.

**Alan Blake**—New Home Specialist

- Coordinate ROCs, civil engineer, contractors for New Pads.

**Kelli Cicirelli**—Director of Organizational Training and Leadership

- Oversee TA associated with PRICE grant, and coordinate with ROC-NH team members:
  - Visioning sessions
  - Bus Tour
  - Video
  - Community Celebrations

Vacancies and Staff Changes: Pre-grant award preparations to fill the PRICE Act Grant Program Director, two Program Administrators, and a second Community Project Specialist include

identifying potential applicants and sources of applicants with NH CDFR, and through NHCLF's staff who are administering the USDA grant program (Sustainable Food Systems program). Job postings will be placed immediately after an award is announced.

NHCLF has a long history of cross-training staff and working as a team. In the event a staff person leaves, their assignments will be immediately spread out to other staff until the position can be filled. NHCLF does not see the possibility of staff departures as interruptive to PRICE Act progress.

### **Experience promoting racial equity**

While NHCLF has always worked with minority owned business owners, in 2020, NHCLF wanted to do more and go deeper. NHCLF worked in partnership with the Manchester, NH, NAACP to launch the Community Driven Economic Empowerment program to facilitate the resilience and growth of businesses owned by people of color.

NHCLF conducted 45 third-party interviews with Manchester area businesses to help better inform financial and technical assistance needs of businesses owned by people of color. In 2023, NHCLF launched the Accelerator Program, offering \$5,000 grants for BIPOC business owners. The Accelerator Program was first piloted in the Manchester, NH, area. NHCLF received 34 applications and was able to fund 20 businesses. All business owners who applied received free technical assistance. The program was so successful, in 2024, NHCLF launched the Accelerator program statewide. In April 2024, NHCLF received 80 applications and funded 59 businesses. NHCLF also works with NH BAPOC (Business Alliance for People of Color) to share information about the program and increase outreach. Since 2020, NHCLF has made 12 loans to BIPOC totaling \$917,000 (which includes one LOC), with many more in the pipeline.

NHCLF works with Overcomers Refugee Service and the Organization for Refugee and Immigrant Success for outreach to New Americans buy homes in ROCs. But a potential barrier for New Americans and ROC living is access to a vehicle, since most ROCs are sited in more rural settings. NHCLF has been working with agencies supporting New Americans on this issue. What is being recommended is to encourage multiple families to purchase homes in the same or nearby ROCs, and purchase a vehicle together and share it.

NHCLF is committed to ongoing Diversity, Equity, and Inclusion (DEI). Participation and training include: Opportunity Finance Network's conference, education, and peer learning, Black New England conferences, free DEI books available through our Employee Assistance Program, a staff committee defining our values, monthly all-staff DEI trainings with Jermaine Moore of the Mars Hill Group, Diversity Workforce Coalition Workplace Equity Learning Challenge, Storytelling training with Luis Ortega from Storytellers for Change, NH Listens, Leadership Equity Exchange, and more. In 2021, the organization created a cross-functional, staff-led DEI committee with representation from each department. That committee continues to meet monthly to discuss educational topics and how to move our DEI work forward within the organization. Through the group's work, the Mars Hill Group were identified to provide an ongoing learning curriculum for our staff. The monthly all-staff DEI meetings and staff participation are tracked.

### **Experience completing environmental reviews**

NH CDFA has experience in reviewing all environmental reviews submitted under CDBG applications/awards and working with environmental consultants on updating guidance/trainings/standards related to environmental reviews under 24 CFR part 58.

NHCLF's ROC-NH has worked with engineers (CMA/Horizons/SRW (environmental consultant) to complete and reevaluate environmental reviews to 24 CFR part 58 standards in CDBG acquisitions and infrastructure upgrades to manufactured housing cooperatives.

In addition, in January of this year, NHCLF acquired the assets, services, and staff of Northern Community Investment Corporation (now, Northern Community Investment Capital or NCIC). NCIC brings with it nearly 20 years' experience implementing community economic development projects on behalf of businesses, nonprofits, and municipalities throughout Vermont and New Hampshire. Each of these projects, representing millions of federally funded dollars and including both construction and non-construction projects, have successfully navigated environmental review requirements.

The selection of PRICE awardees will occur before NHCLF's selection of ROCs. Therefore, NHCLF agrees to:

- (1) Supply HUD with all available, relevant information necessary for HUD to perform for each property any required environmental review (in accordance with 24 CFR part 50);
- (2) Carry out mitigating measures required by HUD or select alternate eligible property; and
- (3) Not acquire, rehabilitate, convert, lease, repair or construct property, nor commit or expend HUD or local funds for these program activities with respect to any eligible property, until HUD approval of the property is received.

### **Cross-Cutting Federal Requirements**

NHCLF understands and acknowledges that various cross-cutting federal requirements will apply to this grant award. These cross-cutting requirements may include but are not limited to Uniform Administrative Requirements, Cost Principles, Audit Requirements, Davis-Bacon labor standards, fair housing and nondiscrimination requirements, the Uniform Relocation Act, and environmental laws. Specific to environmental regulations, we confirm that no choice-limiting actions will be taken ahead of completion of the environmental review and HUD's approval. NHCLF agrees to comply with these requirements and has done so as standard business practice throughout our more than 40-year organizational history. Of note, a financial and federal fund single audits are conducted annually by an independent CPA firm.

As examples of our experience with cross-cutting requirements, NHCLF has managed grant funding awarded through the US Treasury's Community Development Financial Institutions Fund, and five other agencies. NHCLF has successfully managed/administered each of these grant awards which imposed cross-cutting federal requirements.

Our staff is familiar with federal funding requirements, PRICE Act program rules, regulations, and procedures, and our grant administration is designed to follow those regulations.

**EXHIBIT F: Match or Leverage**

New Hampshire Community Loan Fund

**MATCH OR LEVERAGE**

NHCLF anticipates that the Preservation Fund, \$5M, will be leveraged 11 times with private funding, or \$55M. This is based on previous experience with creating new ROCs (in particular the Big Deal, as referenced on page 6). However, at this point in the process, it is not possible to provide commitment letters with specific dollar amounts (as per the grant instructions).

In addition, NHCLF anticipates that Gap Funding will likely be matched with other sources, including USDA-RD, NH DES, and CDBG, as well from capital reserves and refinancing from the ROCs. These funds will be made available on an as-needed basis.

Selected ROCs for infrastructure and new pads, will likely be providing match through financing such as:

- RLOCs via NHCLF. This is a revolving line of credit (5% interest) made available to ROCs that wish to set new pads and new homes. RLOCs are paid back after the homes are sold.
- Capital Reserves (exception not norm).

**EXHIBIT G: Long-Term Effect**

New Hampshire Community Loan Fund



## **LONG-TERM EFFECT**

Retain affordable housing opportunities for LMI households: By becoming a ROC (through the Preservation Fund), low-income homeowners can preserve their affordable homes and never face eviction for park closure. ROCs control monthly lot rents and fees. ROC Bylaws also disincentive selling of their communities (through lack of ability to retain profits). In 40 years, not one ROC in New Hampshire has sold their community.

Through adding new pads and setting new homes, ROCs fill vacant lots, which helps the overall housing crisis in New Hampshire, and provides longer-term security (through maximizing lot rents). When a home is sold, ROC Bylaws state that a low-income individual or family must be given preference to purchase over buyers with higher incomes.

ROCs in New Hampshire have access to long-term, fixed-rate mortgage financing for manufactured homes through NHCLF's Welcome Home program. Downpayment and closing cost assistance is available (0% sleeper mortgages that are only paid back after the full mortgage is paid in full or after a home is sold).

NHCLF services to ROCs include Leadership Training where ROC members learn speaking skills, meeting management, and municipal processes. Most participants (75%) are women. The program has graduated 170 ROC leaders, each eligible for four college credits, prompting several participants to continue on at college. Before-and-after assessments show increases in community leadership and success in the workforce.

Affordable lot rents: Funds for infrastructure repair (the majority of this proposal) maintains affordability through reducing expense (through repairing water leaks) and lays the groundwork for reduction in fossil fuel usage by upgrading electrical systems to Phase III power (to accommodate solar arrays).

An example of how infrastructure repair helps keep lot rents remain stable is Camp Sargent Road Cooperative in Merrimack. This is a 98-home community that the homeowners acquired in 1998. The ROC replaced failing septic systems with a connection to municipal sewer using CDBG and proceeds from refinancing its debt. Rent has been stable since acquisition and is currently \$380 per month, compared to the estimated fair market rent for MH is \$748 for the Nashua area.

Another is Woody Hollow Cooperative in Boscawen. This is a 35-stite community, acquired by the homeowners in 1994. The ROC recently replaced its municipally connected water and wastewater systems using CDBG and USDA-RD loan/grant funding. The ROC did increase its rent by \$75 to complete the project, but rent is currently \$285 per month compared to an estimated MH fair market rent of \$583 for Merrimack County.

ROCs vote to increase lot rents and it is in their self-interest to keep rents low, which they do. An example of the stability of lot fees is Bear View Crossing in Allenstown. They were able to purchase their park in 2019 with a rent of \$565, which has remained stable. But a private equity firm in California purchased Kings Towne in neighboring Epsom. Once the park was acquired, rent went from \$560 to \$690, and it is currently \$700.

Long-term stability: Long-term benefits for homeowners in ROCs include wealth creation through asset building (appreciating home value, homeowner preference for ROCs—UNH Carsey Study), improved conditions, better home quality (replacements or improvements), civic

engagement, and increased affordable housing (full occupancy through in-fill development also improves financial strength of the ROC).

Over 40 years, ever since NHCLF started helping low-income homeowners purchase their communities and become ROCs, income levels have remained stable, with 80% of homeowners at 80% AMI or below. For pads installed with PRICE Act funds, deed restrictions will be filed with county registrars that will require affordability (purchase by a LI buyer) for 15 years.

Supporting underserved communities: Underserved communities partake of all the benefits of ROC living and the advantages of infrastructure repair (financial, health and safety, environmental), including asset building through homeownership.

ROCs' Bylaws state on the first page that membership eligibility is defined without regard to their social, political, racial, color, national origin, religious, age, sex, sexual orientation, physical or mental disability, or familial or marital status. The last page includes the International Cooperative Principles, the first of which is a pledge to maintain Voluntary and Open membership without gender, social, racial, political or religious discrimination.

During the acquisition process, new ROC boards and membership committees receive Fair Housing Act training from the ROC-NH Training Team. All ROC members have access to a virtual Fair Housing Training through ROCKET, a training platform run by ROC USA. ROCs also receive ongoing technical assistance through ROC-NH which may include continued training and support on upholding Fair Housing Act requirements in their communities.

Increasing Resiliency: PRICE Act funded infrastructure repair and upgrades will:

- Provide more efficient systems, stop leaking water (a major problem with older, aging systems), improve water quality through reducing risk of contamination, and improve runoff and drainage issues. More efficient systems mean less costly systems.
- Improved protection and resilience from flooding and power loss due to storms. Infrastructure projects will incorporate Low Impact Development techniques to improve runoff and drainage issues. Electrical work will often entail the removal of trees and branches so that power can be maintained through storms with heavy snow or ice.
- Reduce fire hazards by addressing low lines, improperly protected electric service lines, either exposed above ground or without conduit, directly buried below ground, or both. In addition, electrical upgrades will repair dilapidated meter backboards or electrical poles and replace corroded meter receptacles.

NHCLF's PRICE Act proposal aims to help ROCs increase resiliency through improving aging and costly infrastructure systems, which improves health, safety, environmental mitigation, and improved financial savings. This proposal aims to increase the supply of affordable manufactured housing in ROCs, and help low-income homeowners preserve their communities for the long term, through having access to financing that makes land ownership possible.