

DRAFT APPLICATION FOR THE PUBLIC COMMENT PERIOD  
JUNE 20, 2024 – JULY 4, 2024

US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
NOTICE OF FUNDING OPPORTUNITY (NOFO) FR-6800-N-99

PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY  
ENHANCEMENT (PRICE) GRANT COMPETITION

WAKE COUNTY, NORTH CAROLINA



**PROPOSAL PARTNERS:**

**WAKE COUNTY GOVERNMENT**

**HABITAT FOR HUMANITY OF WAKE COUNTY**

**LEGAL AID OF NORTH CAROLINA**

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## **Exhibit A - Executive Summary**

The Preservation and Reinvestment Initiative for Community Enhancement (PRICE) grant offers a transformative opportunity to revitalize manufactured housing communities in North Carolina. Wake County Housing Affordability and Community Revitalization Department (Wake County Housing), Habitat for Humanity of Wake County (Habitat Wake), and Legal Aid of North Carolina (Legal Aid of NC), hereafter referred to as “Partners”, bring together their respective expertise in community development, affordable, and legal services to address the critical needs of manufactured housing communities (MHCs) and residents. This strategic collaboration between the Partners combines decades of expertise to meet the urgent needs of residents and set a national standard for the preservation and revitalization of manufactured homes.

Wake County leverages its robust Affordable Housing Development Program (AHDP) to administer significant funds aimed at the acquisition and preservation of MHCs. With a well-established, federally compliant process for competitive financing, Wake County is exceptionally positioned to preserve affordability either through community ownership or mission driven acquisition to ensure stability for residents through a 30-year affordability period.

Founded in 1985, Habitat is a pivotal force in the local housing continuum by providing low-wealth families with transformational opportunities through the construction of affordable homes. Their deep-rooted experience in building, renovating, and repairing homes makes them an ideal partner for the redevelopment or replacement of aging manufactured units in Wake and Johnston Counties. Habitat’s initiatives not only elevate living conditions but also fortify environmental resilience. By securing deed-restricted affordability and engaging directly with community owners, Habitat ensures the impacts of their work are both immediate and lasting.

Legal Aid, with over two decades as North Carolina’s largest statewide nonprofit legal aid program, stands at the forefront of defending the rights of the state’s most vulnerable populations. Renowned for its Fair Housing Project, Legal Aid’s housing advocacy is a beacon of national excellence in housing rights enforcement and legal service delivery. In this partnership, Legal Aid commits to providing crucial legal services to prevent displacement and enhance living standards. Their seasoned attorneys and paralegals will protect residents from unlawful evictions, champion safe and sanitary living conditions, and engage in vital community education and outreach efforts.

Together, the Partners aim to create a durable model for enhancing manufactured housing communities, making them bastions of stability, safety, and sustainability. This partnership not only addresses immediate challenges but also lays the groundwork for long-term improvements, ensuring that the Triangle’s manufactured housing communities are places where residents can thrive with dignity and security.

This collaboration promises transformative outcomes for over 500 households by securing safer, more affordable, and legally protected living environments. The strategic focus on community preservation and legal advocacy will foster a more resilient and empowered resident base, ready to thrive in a changing world.

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Critical to our strategy is a deep commitment to resident and stakeholder involvement. By aligning our efforts with the needs and aspirations of the community, we ensure that our interventions are not only effective but also embraced by those they are designed to benefit.

This partnership under the PRICE initiative sets a groundbreaking precedent for collaborative community enhancement. This project is poised to deliver sustainable, impactful change, establishing a benchmark for affordable and resilient manufactured housing solutions nationwide.

Grant Request	Program area	Partner	Request
<b>PRICE Main</b>	Acquisition	Wake County	\$35,000,000
	Replacement	Habitat	\$20,000,000
	Tenant's Rights	Legal Aid	\$2,100,000
	Financial Assistance	Wake County	\$500,000
	<b>Subtotal</b>		<b>\$57,600,000</b>
<b>PRICE Replacement Pilot</b>	Acquisition & Redevelopment	Wake County & Habitat	\$10,000,000
	<b>Subtotal</b>		<b>\$10,000,000</b>
<b>Total</b>			<b>\$67,600,000</b>

## **Exhibit B - Threshold of Requirements and Other Submission Requirements**

This narrative outlines the requirements and submissions necessary for compliance with the PRICE grant as detailed in the Notice of Funding Opportunity (NOFO) FR-6800-N-99.

### **Resolution of Civil Rights Matters**

In accordance with the eligibility criteria set forth in the NOFO, we affirm that there are no outstanding civil rights matters pertaining to the Partners organizations.

### **Timely Submission of Applications**

We affirm that the application will be submitted before the deadline: July 10, 2024, 11:59EST. We acknowledge that late applications are deemed ineligible.

### **Eligible Applicant and Number of Applications**

We confirm the Partners are eligible applicants and Wake County will submit one combined application on behalf of the Partners for both PRICE Main and PRICE Replacement Pilot. Below are details on the eligibility of each participating entity under Section II.A:

- **Wake County Government:** 01 - County Governments
- **Habitat for Humanity of Wake County:** 25 - Other eligible applicants
- **Legal Aid of North Carolina:** 25 - Other eligible applicants

The Partners have formalized their collaboration for this multi-jurisdictional joint application through a Letter of Intent and Memorandum of Understanding, demonstrating a committed partnership to implement the proposed projects.

**Contact:** Alicia Arnold, Deputy Housing Director, Wake County Housing  
[Alicia.arnold@wake.gov](mailto:Alicia.arnold@wake.gov), (919) 856-5268

**Address:** 337 S. Salisbury St. Raleigh, NC 27601

### **Other Submission Requirements**

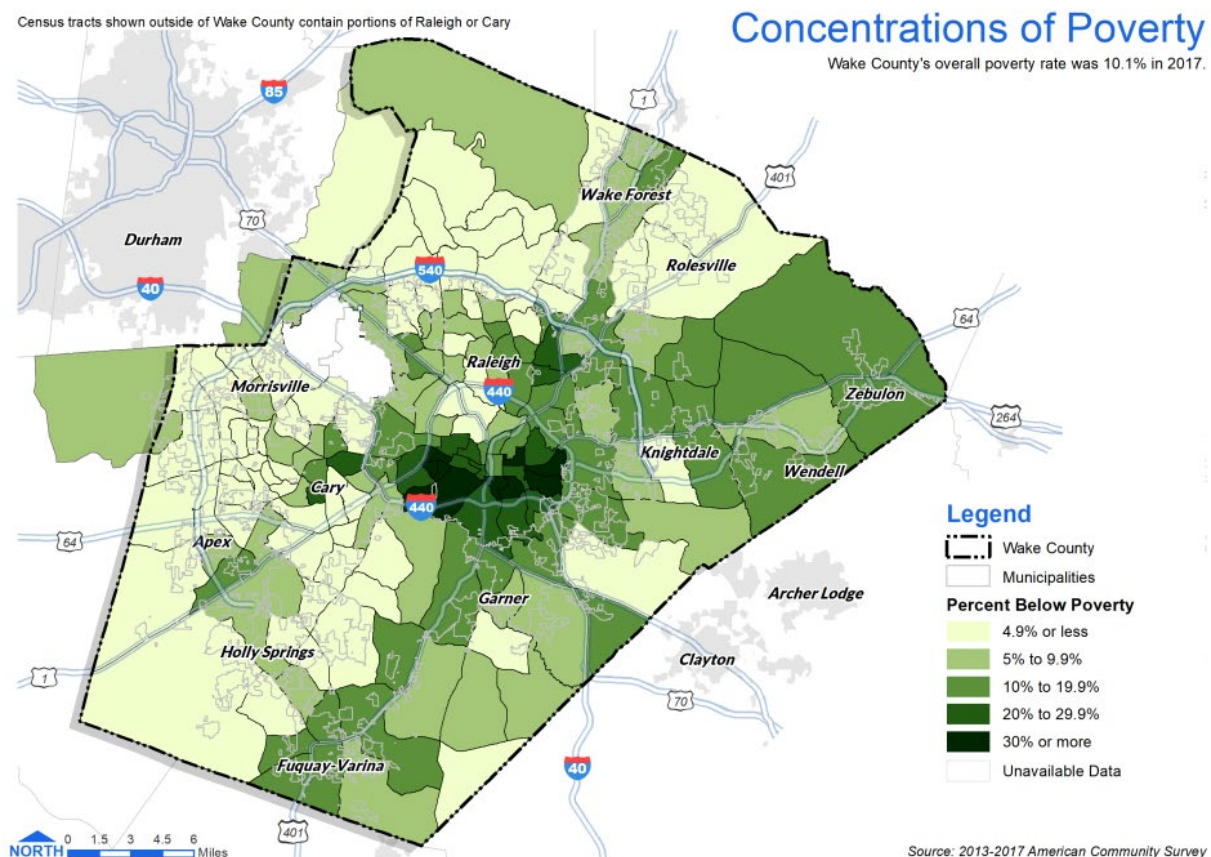
This narrative ensures that all necessary application components have been appropriately submitted and confirms compliance with NOFO FR-6800-N-79 requirements.

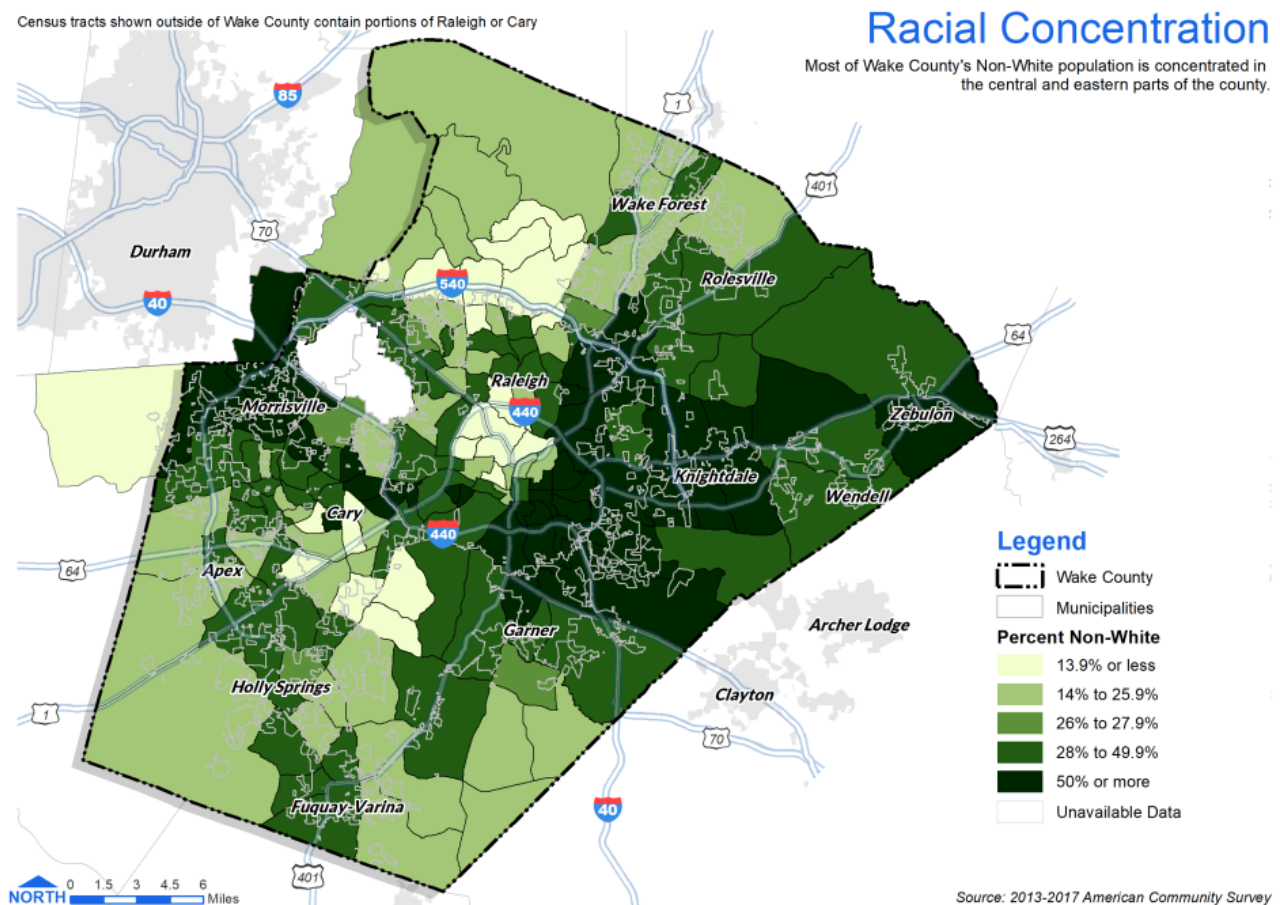
## Exhibit C - Need

Wake County is the most populous County in North Carolina with 1.175 million residents and home to Raleigh, the state capital. The County has experienced rapid population and income growth, with residents drawn to quality of life and economic opportunity driven by the presence of education and healthcare institutions, as well as a large and growing technology and life science sector. While Wake County's poverty rate is only 7.5%, this represents more than 88,000 residents. This is more residents than the total population of 77 counties out of the 100 counties in North Carolina.

The Partners are applying for both PRICE Main and PRICE Replacement Pilot funds with the goals of creating stability and long-term wealth-building opportunities for manufactured housing communities and residents in Wake County. Local data shows manufactured housing is primarily occupied by populations the broader housing market has left behind. This important sector of the community must be preserved as it houses a critical subsection the affordable housing stock.

Rapid growth shifted resident demographics. Wake has reached its tipping point for displacement. While the number of households making less than \$75,000 a year remained the same, they are a shrinking segment of the population now representing 43% of all households, down from 60% one decade ago. The growth of affluence has also disproportionately affected the Black and Native American populations which earn 54% and 67% of the Area Median Income respectively. This demonstrates the affordable housing crisis and a burgeoning homelessness crisis affecting our historically marginalized communities.





Many of the places experiencing higher concentrations of poverty are also places experiencing gentrification when in proximity to desirable amenities or geographies. According to Wake County's 2023 Annual Housing Report, there is an affordable housing deficit of 65,860 units. There has been robust housing production, including the creation of more than 4,000 legally binding affordable homes since 2019. However, unrestricted residential units, both rental and homeownership, are typically priced at levels that are far beyond the reach of low-income households.

As of April 2024, the median sale price of a home in Wake County was \$500,000 according to Redfin. The median rent was \$1,487 for the Raleigh metro area according to Realtor.com's monthly rental report. However, in Wake County, three out of every four (72%) low-income households pay more than 30% of their income on housing, compared to 24% of all Wake County residents regardless of income. Half of all low-income households in Wake County, are severely cost burdened, meaning a family pays more than 50% of their income on housing.

Additionally, Wake County is an attractive market for value-add investors, resulting in a loss of thousands of existing affordable rental units to the market. From 2010 to 2020, homes renting for less than \$1,000 per month decreased by 46% while the number of homes renting for more than \$1,000 per month increased by 163%. Low-income renters struggle to transition to



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homeownership as well. Home purchase costs have increased by 55% since 2018. Low-income owners also struggle to maintain their assets. 57% of low-income homeowners have lived in their homes for more than 10 years, but many are unable to afford repairs or rising costs.

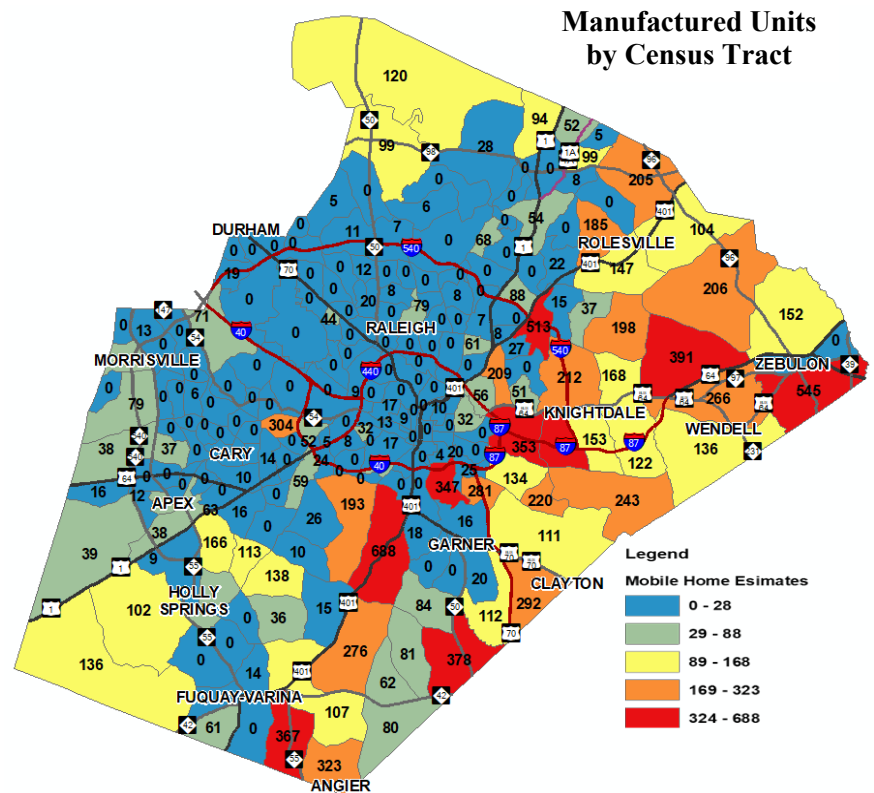
Amidst the growth and changes, Wake County is also home to over 13,000 manufactured housing units and more than 150 manufactured home communities. These units often contribute to the Naturally Occurring Affordable Housing (NOAH) stock within the County. The Manufacture Units by Census Tract map illustrates the distribution of manufactured housing units throughout Wake County.

Similar to the poverty and racial concentrations, manufactured housing units are concentrated in higher poverty areas where non-white populations reside. The average household income for those residing in manufactured housing is \$38,669, compared to Wake County's median household income of \$88,471. Additionally, 62% of manufactured housing units in Wake County are occupied by non-white households.

Residents of manufactured housing communities are at particular risk of displacement, even those who own their units. The land beneath manufactured housing communities is increasingly attractive to investors looking for redevelopment opportunities. Wake County recently assisted a municipality with a park closure that displaced nearly 50 families. Homeowners who wished to transfer their home found very few places to move, were faced with abandoning their asset and entering the rental market.

These residents are entering a housing market with very limited options for low-income households. Vacancy rates at affordable rental properties are very low and properties often maintain extensive waiting lists. Local housing authorities have limited resources to provide tenant-based and project-based rental assistance. They also maintain significant waiting lists. Finally, with high prices and limited supply, residents who wish to transition to traditional homeownership face steep challenges.

While communities are being lost to redevelopment, those that continue to operate have very limited vacancy and creation of new communities is often prohibit or hindered by municipal zoning ordinances. Five of the County's twelve municipal zoning codes explicitly forbid or do not address creation of new manufactured housing communities. While others require special use permits, additional construction requirements, or placement of manufactured housing on a





permanent foundation which deter development. It is the Partners desire through this grant opportunity to educate municipal staff and residents of the importance of manufactured homes as a piece of the broader housing continuum. Thus, Wake County, Habitat Wake, and Legal Aid of NC are pursuing a preservation and redevelopment strategy with the following objectives:

- **Acquisition** to preserve manufactured housing communities and ensure long-term affordability and stability.
- **Replacement** to replace housing units that cannot be rehabilitated, or pre-1976 units, to increase quality of life for manufactured housing residents and allow for long-term unit affordability.
- **Displacement Prevention** to inform manufactured housing residents – renters and owners – of their rights and help them understand their options when their community is being redeveloped. To financially assist with relocation of manufactured homes or other housing options to prevent homelessness.
- **Affordable Redevelopment** to create additional affordable housing units than exist currently to provide current residents with physically secure affordable housing options and opportunities for wealth-building through homeownership.

The strategy and approach will be described in more detail in Exhibit D.

## **Exhibit D - Soundness of Approach**

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

Wake County Housing is a department of local government responsible for providing an affordable housing and homeless services to residents of Wake County, North Carolina. Wake County Housing is a HUD Urban County with extensive experience administering grants, including CDBG, HOME, ESG, HOPWA, and CoC. CDBG-funded programs support infrastructure improvements, housing rehabilitation, public services across the ten municipalities within the Urban County jurisdiction. In addition, the HOME Consortium consist of Wake County and the Town of Cary. As part of this application, Wake County will execute a Memorandum of Understanding with the City of Raleigh to collaborate and participate in the implementation of any PRICE-funded programs within their entitlement jurisdiction. The goal is to preserve long-term housing affordability for residents of manufactured housing and manufactured housing community (MHC) countywide, and if displacements occur, stand prepared to assist residents in identifying sustainable housing options.

Since 1985, Habitat Wake has built more than 850 safe, affordable, energy-efficient homes in all parts of Wake and Johnston counties serving nearly 2,000 families with new construction, home preservation and global building. Habitat Wake is a leading, non-profit housing developer, bringing expertise in affordable housing construction, rehabilitation, and community development. Habitat Wake has successfully utilized a variety of federal funding sources to create and preserve long term affordable housing. Habitat's model is internationally known while also uniquely adapted to local areas for success.

Legal Aid is a statewide, nonprofit law firm that provides free legal services in civil matters to low-income people in order to ensure equal access to justice and to remove legal barriers to

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economic opportunity. In 2023, they managed over 25,000 cases, empowering more than 65,000 individuals to understand and assert their rights. In addition to their core services, Legal Aid has several projects, such as the Economic Justice Initiative and the Fair Housing Project, that tackle specific areas of law for underserved client populations. Legal Aid is uniquely positioned to ensure tenant protections, advocate for fair housing practices, and provide legal assistance to residents facing housing-related challenges. Their involvement will help address legal barriers to housing stability and affordability.

### ***Project Goals***

Wake County, Habitat Wake, and Legal Aid of NC envision utilizing PRICE Main Funds and PRICE Replacement Pilot Funds to achieve the following key goals:

1. Prevent displacement of manufactured housing residents and ensure stability for vulnerable households.
2. Preserve manufactured housing units as a source of affordable housing in Wake County and increase the number of overall affordable housing units available.
3. Utilize affordable housing as a platform for economic opportunity and wealth-building for low-income households.

These goals align with HUD's Strategic Plan for Fiscal Year 2022- 2026 goals and objectives to support underserved communities, ensure access and production of affordable housing, promote homeownership, and advance sustainable communities. The Partners aims to achieve these goals through the following activities.

### ***Project Activities***

**Acquisition and Infrastructure (PRICE Main):** Wake County Housing will administer \$35 million for the acquisition and preservation of up to two existing manufactured housing communities. The key objectives of this activity will be to facilitate ownership of communities by residents or organizations that will guarantee long-term affordability, and to facilitate investments in community infrastructure and housing stock to address environmental and health concerns.

Wake County Housing will administer funds through its existing Affordable Housing Development Program (AHDP), an annual, competitive solicitation process whereby applicants request gap financing for projects. A special request for proposal (RFP) process will be incorporated into the existing program structure and released in December 2024. AHDP applications are analyzed in-depth and scored for the most competitive applications to be awarded funds. Funds will be provided as long-term, low-interest loans with accompanying 30-year deed restrictions. Resident groups, non-profit and for-profit organizations, and municipalities, as well as partnerships thereof, will be eligible to use funds.

Applications for acquisition and infrastructure investment funding will be evaluated on their incorporation of infrastructure investment, specifically those investments that address health, safety, sanitary, and environmental issues, including but not limited to community well installation and repair, septic system installation and repair, municipal water and sewer connections, stormwater management, flood risk mitigation, wind hazard mitigation, and environmental hazard remediation. Priority will also be given to preservation of communities

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located in areas of opportunity where access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards are present. Any organization acquiring a community with PRICE Main funds will be required to agree to a minimum 30-year affordability period, with preference given to those applicants who will preserve affordability for longer. Closing cost for loans issued through this program will be covered by borrowers, consistent with existing policy.

Borrowers will be responsible for implementing infrastructure investments, but staff will be able to provide technical support by leveraging existing partnerships with the County's Environmental Services, Planning, and Facilities, Design, and Construction department. Wake County Housing will also leverage its relationships with municipal jurisdictions to assist and advocate on behalf of the awarded project.

This process will also leverage the County's experience administering CDBG dollars for public facility projects through the Community Investment Partnership Program (CIPP). Existing Wake County Housing staff will administer the AHDP and CIPP programs supporting the awarded projects, including competition administration, proposal evaluation, loan closing, project management, monitoring, and reporting. Wake County Housing staff would advertise the availability of funds broadly and notify municipal, non-profit, and other partners to identify or pursue opportunities for investment.

**Replacement (PRICE Main):** Habitat Wake will administer up to \$20 million to replace existing manufactured housing units in Wake and Johnston Counties. Both individual manufactured housing unit owners, as well as manufactured housing community owners, will be eligible. The Partners will seek partnerships with manufactured housing community owners and municipalities to identify manufacture homes in need of replacement. It is estimated that at least 110 manufactured homes will be replaced to support quality of life and environmental resiliency for residents. Utilization of these funds will require deed-restrictions for the replaced units with a minimum 15-year affordability period. Community owners and other beneficiaries will apply directly to Habitat Wake. Applications will be advertised broadly in multiple formats starting January 2025. Habitat Wake will evaluate and prioritize all applications by need and availability and work with beneficiaries to coordinate the logistics of replacement. The Replacement Activity budget is summarized in the following table:

**PRICE Grant Replacement Activity Budget**

Category	Units Served	Cost/Unit	Budget	Notes
Purchase & Delivery	110	\$140,000	\$15,400,000	Unit purchase and transport typically packaged together
Installation	110	\$11,000	\$1,210,000	Includes connections site work, other miscellaneous costs
Removal and Disposal	110	\$10,000	\$1,100,000	Includes disposal fees and labor
Contingency			\$885,500	5% of Purchase, installation, and removal costs rounded for budget
Administration and Project Delivery			\$1,400,000	Staff, contractors, and outreach activities
<b>Total Budget</b>			<b>\$20,000,000</b>	

**Displacement Prevention and Education (PRICE Main):** Legal Aid of NC will administer \$2.1 million, or \$350,000 per grant year, to provide representation to eligible manufactured home tenants for tenant rights, fair housing, and other housing stability services preventing displacement. Specific activities include defending against unlawful evictions, ensuring that rented units are maintained to safe and habitable standards in accordance with North Carolina state law, advocating for reasonable accommodations for residents with disabilities, representing manufactured homeowners who may be at risk of losing their homes due to contract disputes, and providing general legal education, information, and outreach services. Funds will be used to hire two attorneys and one paralegal, and will cover indirect expenses, outreach and education, and printed material costs.

Additionally, Wake County Housing will procure a partner organization to administer \$500,000 in financial assistance for tenants or homeowners who may be displaced due to closure or redevelopment of their community. This will include assistance in locating a new community or land to move a manufactured home, relocation to another affordable housing community, or assistance with a down payment to acquire a new home.

**Acquisition and Redevelopment (PRICE Replacement Pilot):** Wake County Housing and Habitat Wake will partner to use \$10 million in PRICE Replacement Pilot funds to acquire and redevelop a manufactured housing community in Wake County, with a specific objective to create homeownership opportunities for low- and moderate-income families. With many years of experience developing homeownership opportunities in Wake County, Habitat Wake will take ownership of a community and lead redevelopment efforts. Both rental and homeownership opportunities will be incorporated into the new community.

Wake County Housing and Habitat Wake have been in discussions with municipalities and manufactured housing community owners about communities that are at risk of sale or redevelopment. With discussions already underway, the partners stand ready to select and execute a redevelopment opportunity. Given prices communicated to during partner discussions, PRICE Replacement Pilot funds will make the acquisition and redevelopment feasible. Wake County will administer funds and provide project management and compliance support to ensure project feasibility.

Redevelopment projects will be candidates for additional permanent loan financing from Wake County's Affordable Housing Development Program, as well as infrastructure development support through the Community Investment Partnership Program. Low-income buyers of homes created through redevelopment may be eligible for homebuyer assistance from the State, County, or local level. Wake County administers approximately \$10 million annually through the Affordable Housing Development Program, \$300,000 in the Community Investment Partnership Program, and \$750,000 annually in homebuyer assistance funds. Opportunities to diversify housing typology, including replacement of new manufactured housing units, may be incorporated into redevelopment. Habitat has a robust fundraising network to leverage additional funds for redevelopment opportunities. Specific match sources will be discussed in Exhibit F.

### **Affordability and Equity**

Due to the unique nature of manufactured housing within the broader housing market, owners of communities and residents are often left out of programming designed to create or preserve affordable housing. There are often barriers to securing financing, seeking repairs, relocation, and establishing or expanding communities. However, manufactured home communities and manufactured homes represent a critical piece of the housing market. The Partners understand the importance of manufactured housing community preservation. Where preservation is not an option, the redevelopment of communities into affordable housing is the best way to prevent displacement and ensure long-term affordability for residents. Both preservation and replacement activities will be secured through long-term affordability restrictions codified in Deeds of Trust, as well as development and loan agreements.

Acquisition and Infrastructure activities will put manufactured housing communities in the control of either their own residents or mission-aligned organizations. Provision of funds will be contingent on agreement to long-term affordability restrictions of 30-years as a minimum. Further, applicants will be required to incorporate investments that address environmental concerns into their proposals, addressing environmental equity. Replacement activities, which conducted in partnership with a manufactured housing community owner, will require acceptance of long-term affordability restrictions. Replacements will also act as physical preservation – replacing an outdated unit or unit that cannot be rehabilitated with a new one will effectively extend the lifespan of that unit.

Homeownership opportunities created through redevelopment activities will be supported by Habitat Wake's own low-cost financing options, and residents may be able to access additional homeownership supports from the State of North Carolina, Wake County, or a municipal government. Manufactured housing units operating as rental housing and supported through an investment of PRICE funds will need to abide by standard Wake County requirements, including affirmative marketing strategies, tenant selection policies ensuring fair housing, required notice of rent increases to residents, required approval of rent increases by Wake County, and submission to ongoing, on-site compliance monitoring conducted by Wake County. These requirements will be documented in development agreements, loan agreements, subrecipient agreements, and any other contractual documents between parties.

Displacement Prevention and Education activities will provide resident-centric supports, informing them of their rights and financial assistance to allow them to remain in their homes or identify other sustainable housing options. Legal Aid of NC's advocacy approaches are grounded in equity and inclusion. They are an innovative, creative, progressive, and efficient civil legal service provider, working toward an inclusive justice system of equal access. All voices are valued, heard, and respected.

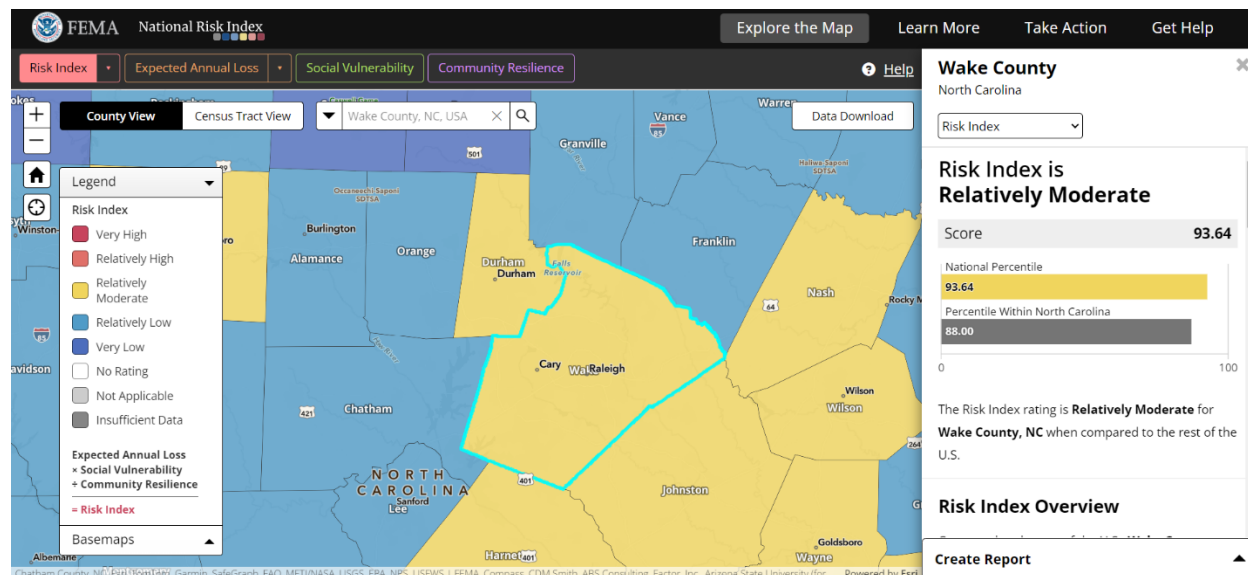
The Partners will ensure this project is grounded in equity and inclusion through several strategic approaches:

- **Targeted Outreach and Engagement:** Focus will be on reaching out to underrepresented and marginalized within the manufactured communities. This includes providing tailored outreach programs in multiple languages, community meetings, and collaborations with local organizations that serve diverse populations.

- **Inclusive Service Delivery:** Services will be accessible to all residents through various channels. Services will be offered in-person, online, and via telephone, to accommodate different needs and preferences. Accessibility adaptations are offered, such as offering services during evening hours to accommodate working residents.
- **Culturally Competent Staff:** Partners are committed to hiring and training staff who are culturally competent and, ideally, reflective of the community demographics. This helps in building trust and ensuring that the services provided are sensitive to the cultural and socio-economic realities of the residents.
- **Holistic Legal Support:** Legal Aid of NC prides itself on not just addressing isolated legal issues but providing comprehensive legal support that considers all aspects of a client's life. This could include not only defending against evictions but also advocating for better living conditions, accessibility improvements, and offering supportive services for a stable living environment. Legal Aid of NC is in the process of modernizing their client intake processes and will be implementing robust systems to monitor who is accessing services and improve data analytics to highlight the outcomes of these engagements. This data can be used to adjust programs to better meet the needs of diverse populations and to ensure equitable distribution of resources.
- **Comprehensive Fair Housing Education:** Legal Aid of NC will coordinate extensive education and outreach campaigns to inform residents about their fair housing rights. These campaigns will focus on the rights to non-discrimination based on race, color, national origin, religion, sex, familial status, or disability, and how these rights apply specifically in the context of manufactured housing. The Partners will join these efforts to provide additional information on services and programs available for residents.
- **Legal Representation and Advocacy:** Robust legal representation will be provided to residents who face discrimination. This involves pursuing litigation against landlords or management companies who violate fair housing laws or establish unreasonable barriers to housing accessibility for residents with disabilities.
- **Collaborative Partnerships:** Partnerships with local and state fair housing groups will be leveraged to strengthen advocacy and education efforts. These collaborations may lead to joint initiatives, such as workshops and seminars, aimed at landlords and community managers to educate them on their obligations under fair housing laws.
- **Equity Monitoring:** Legal Aid of NC has established mechanisms to continuously monitor and evaluate housing equity within communities. Legal Aid of NC may analyze data on housing applications, affordability metrics, and resident demographics to ensure compliance with fair housing standards and to address any emerging issues proactively.

### **Environment and Resilience**

According to the FEMA National Risk Index, Wake County has a risk index of 93.64%, indicating a relatively moderate level of risk. The Risk Index is determined through a calculation that factors in Expected Annual Loss from natural hazards, Social Vulnerability, and Community Resilience. High-risk areas in Wake County include those prone to hail, ice storms, lightning, riverine flooding, and tornados.



As Manufactured Home Communities plan, construct, update, or retrofit their critical infrastructure, it is crucial to consider the entire lifecycle of the investment. This includes demographic shifts, interconnections with other infrastructure systems, immediate and long-term risks, potential disruptions, and the resulting impacts on economies, public health, and wellbeing. Since many of these critical infrastructure systems are interdependent and managed by a mix of public and private entities, collaboration is essential. The Partners will engage with governmental agencies and environmental justice organizations to analyze specific communities' risk, collaboratively educate communities on resiliency efforts, and design mitigation strategies to avoid potential failures of infrastructure or catastrophic events due to natural disasters or climate change.

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

- Floodplain & Stormwater Management:** Due to Wake County's high risk of riverine flooding, flood risk assessments will be conducted to implement floodplain management measures, such as elevating manufactured homes, constructing flood barriers, and implementing stormwater management systems. Stormwater management measures will be assessed, and efforts may be taken to replace or construct drainage systems, retention ponds, and erosion control measures, to reduce the risk of flooding and water damage during severe storms.
- Wind & Ice Storm-Resistant Design:** According to the FEMA National Risk Index, Wake County also has a high risk for tornados, hail, and ice storms. Therefore, retrofitting manufactured homes to improve resistance to high winds and hail such as the installation of wind-rated roofing materials, window shutters, and tie-down systems will help to mitigate the impact of future tornados, hail, and ice storms in this region.
- Site Remediation & Infrastructure Upgrades:** Beyond the environmental risks communicated by the FEMA National Risk Index, the Partners are committed to the high-quality of life of all residents. Environmental site assessments will be conducted to



identify potential hazards, such as soil contamination or hazardous materials, and implement remediation measures to mitigate risks to residents' health and safety. Investments in infrastructure upgrades, such as improving water and sewer systems, upgrading electrical systems, and maintaining roads and drainage infrastructure, to ensure the reliability and resilience of essential services.

- **Weatherization or Replacement:** More than 1,000 manufactured homes within Wake County were built pre-1976, and another 4,000 homes are more than 30 years old. Aging homes who have had limited life cycle maintenance are often less energy efficient and increase costs for their residents. Weatherization programs will be leveraged to increase efficiency and improve affordability for residents. If homes are deemed substandard, they will be replaced with a new, more efficient unit.

Manufactured home communities face an ongoing threat of failing or aging infrastructure, water insecurity poses a significant health risk in many manufactured home communities in Wake County, especially those located in floodplain areas with inadequate water and energy infrastructure. Communities are often owned by aging families who cannot afford critical infrastructure upgrades or by national investment companies who may not prioritize infrastructure in wastewater solutions or stormwater systems. Community residents are often disproportionately people of color, with lower incomes, and high housing cost burdens compared to the broader population of Wake County. Residents may find it difficult to advocate or organize to seek improvements to their living environment. Improving health outcomes of manufactured home communities is directly linked to enhancing living conditions and maintaining infrastructure. However, several barriers impede such improvements, including limited access to public or private financing, exploitative practices by investor-owners, social stigmas, and the growing challenges of climate change.

Targeting investment in home repairs, infrastructure upgrades, and strategic planning for manufactured housing communities aligns with HUD's environmental justice objectives, aiming to reduce health risks, environmental hazards, and substandard housing for low-income households and communities of color. The Partners will advance environmental justice and foster a greener region through these activities. This includes educating staff and the community about manufactured housing, assessing, and addressing environmental damage, and engaging with local jurisdictions to consider land use changes to better support improvements to manufactured housing.

### **Community Engagement**

In preparation for this application, surveys were sent to all manufactured home communities to understand the needs of the landowners, as well as the residents. Additionally, surveys were collected from all municipal jurisdictions to understand local sentiments, misconceptions, and political will. The Partners will continue these efforts and further engage residents, landowners, and municipalities to partner in this effort. Resident and developer engagement will be critical to designing successful programs and projects.

As part of the replacement activities under PRICE Main, the Partners will engage existing and new partners that serve residents in manufactured housing communities, including direct service organizations such as Rebuilding Together of the Triangle and Western Wake Crisis Ministries, to build trust with residents and identify high need communities. The Partners will also consult

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with organizations that serve primarily people of color, especially Hispanic organizations, to develop culturally competent programming and outreach strategies. Targeted marketing activities to reach specific populations will be conducted and networks of over 130 faith congregations will be leveraged to support outreach activities and reach high-need residents.

Policymakers and public servants will be engaged early in the process to create collaborative solutions and political support. Municipal staff will be engaged to bring their deep expertise of the community to strengthen the initiatives. The Partners will also engage manufactured housing community owners to understand challenges, concerns, and opportunities for collaboration.

Under the PRICE Replacement Pilot, Habitat Wake and Wake County Housing already been in discussions with communities where a potential acquisition and redevelopment project could be realized. This includes working with community partners who are engaging residents, such as Fiesta Cristiana, a Hispanic church that provides services to residents in manufactured housing communities. Habitat Wake and Wake County Housing have also been working closely with several municipalities, including elected officials, to align priorities and develop a strategy for acquisition of manufactured home communities.

The proposed activities align with Wake County's affordable housing priorities, as well as the community priorities identified in municipal Affordable Housing Plans across the County. The Town of Apex, the City of Raleigh, the Town of Knightdale, and the Town of Wake Forest have all identified preventing displacement as a priority in their long-range plans. The work proposed here is consistent with these community plans and will be highlighted when engagement occurs in those jurisdictions.

### **Exhibit E - Capacity**

Wake County is an Urban County entitlement jurisdiction and has significant experience administering federal grants. These include HOME, CDBG, HOPWA, ESG, and CoC grants from HUD, as well as ARPA and ERA grants through the US Treasury. Wake County has leveraged several sources to support the creation and preservation of over 4,000 affordable rental and ownership homes since 2019. County staff effectively manage all federally required processes such as environmental review, Davis Bacon, Section 3, MBE/WBE, FFATA and other compliance requirements. Additionally, we have a robust team of financial, procurement, and compliance staff who ensure excellent operation of task associated with 2 CFR Part 200.

Beyond Federal grant experience, Wake County has project management experience through its administration of CDBG for public facilities as well as its public land disposition for affordable housing program. County staff collaborate with internal and external stakeholders to manage project timelines and budgets, ensure that cross-cutting federal requirements are met, and acquire accomplishment data for CAPER reporting.

### **Key Staff – Wake County Housing**

<b>Staff Name</b>	<b>Staff Position</b>
Alicia Arnold	Deputy Housing Director, Operations
Morgan Mansa	Deputy Housing Director, Programs
Mark Perlman	Equitable Housing and Community Development Division Director
Paarth Mehta	Department Business Manager

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Renée Moye	Contracts and Inspections Manager
Diana Youssef	Housing Grants Administrator
Kelly Baraldi	Housing Programs Manager
Vacant	Affordable Housing Planner
Isabella Niemeyer	Community Development Specialist
Vacant	Affordable Housing Development and Lending Manager
John Scales	Community Development Coordinator
Vanessa Kopp	Research, Data, and Systems Division Director
Tracey Glover	Landlord Engagement Unit Program Manager

Habitat Wake has been bringing people together to address affordable housing needs locally for nearly 40 years, with a deep network of community partners, especially with organizations of faith. This strong foundation of community collaboration and support has enabled Habitat Wake to become the premier affordable homeownership provider in our area. Backed by this legacy, Habitat Wake continues to advance equitable housing policies that increase access to housing for everyone in our community, not just homeowners. The Habitat Wake model offers hope, practical solutions, and long-term transformational change.

Habitat Wake has built more than 900 homes in Wake and Johnston counties since 1985 and has served over 2,000 families through new construction and preservation activities. Habitat Wake is also one of the top producers in the international Habitat network, with 130 staff. They also boast the largest ReStore network in the country, with 10 ReStores providing communities with gently used goods. Habitat Wake has significant experience leveraging grant funds from philanthropic partners as well as government agencies, including CDBG, HOME, and Self-Help Homeownership Opportunity Program. Habitat Wake is uniquely positioned to self-fund a portion of our operations through recycled funding from mortgage sales. Habitat Wake staff also have over 50 years combined experience managing complex housing programs, and creatively leveraging resources during major disruptions in the housing market, while consistently delivering exceptional services to homebuyers and homeowners.

### Key Staff – Habitat Wake

Staff Name	Staff Position
Patricia Burch	Chief Executive Officer
Jacquie Ayala	Director of Advocacy
Brad McHugh	VP of Construction
April McVey	VP of Finance
Maria Anderson	Director of Homeowner Services
Patrick Busse	Land Development Manager
Christin Murphy	Director of Community & Volunteer Engagement
Robin Bruce	Home Preservation Manager

Since its inception in 2002, Legal Aid of NC has established itself as a pivotal nonprofit law firm dedicated to providing free, high-quality legal services to low-income individuals and families across all 100 counties of North Carolina. As the state's third-largest law firm with nearly 450 employees in 24 offices, Legal Aid of NC champions legal issue crucial to basic human needs

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including housing, personal safety, food security, and healthcare. Annually, they assist over 50,000 individuals directly and provides legal education to an additional 26,000 households.

In 2023 alone, Legal Aid of NC managed 25,945 cases, benefiting 65,500 people, and securing over \$23 million in awards and savings for clients. This impactful work included preventing over 2,000 home foreclosures and providing services in approximately 5,700 landlord/tenant housing cases. Legal Aid of NC's comprehensive service offerings span numerous legal areas such as housing, consumer rights, public benefits, family law, employment, elder law, and more. Notably, its specialized projects like the Fair Housing Project and Medical-Legal Partnership enhance community well-being by addressing housing discrimination and health-related legal issues, respectively.

Legal Aid of NC also excels in project management, administering significant initiatives like North Carolina's Medicaid Ombudsman Program and the State of NC Navigator Consortium-which provides crucial Affordable Care Act enrollment services. During the pandemic, Legal Aid of NC played a critical role in disbursing over \$12 million in rent and utility assistance. Additionally, the establishment of the nation's first Legal Services Innovation Lab in 2023 underscores their commitment to transforming legal service delivery through innovative and technology-driven solutions, further bridging the justice gap for North Carolina's low-wealth residents.

### Key Staff – Legal Aid of NC

Staff Name	Staff Position
Ashley Campbell	Chief Executive Officer
Scheree Gilchrist	Chief Innovation Officer
Allison Tikare	Director of Client Intake
Elysia Pendergrast	Managing Attorney, Raleigh Office
Shameka Jamison	Housing Supervising Attorney, Raleigh Office
Lauren Brasil	Co-Director, Fair Housing Project
Kelly Clarke	Co-Director, Fair Housing Project
Alecia Amoo	Staff Attorney, Community Economic Development Program

### Exhibit F - Match or Leverage

#### PRICE Main Leverage

This application's PRICE Main request is \$57.1 million. Wake County will leverage \$1.65 million through CDBG and County funding. These funds are firmly committed and dedicated to PRICE activities explicitly. The funding is available for the activities directly related to undertaking the PRICE proposal. Even if the PRICE proposal is funded for a lower amount, Wake County Government is prepared to leverage these funds fully.

Source	FY25	FY26	FY27	FY28	FY29	FY30	Total
CDBG Public Facilities	\$50K	\$50K	\$50K	\$50K	\$50K	\$50K	\$300K

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County Major Repair	\$225K	\$225K	\$225K	\$225K	\$225K	\$225K	\$1,350K
<b>Total</b>	<b>\$275K</b>	<b>\$275K</b>	<b>\$275K</b>	<b>\$275K</b>	<b>\$275K</b>	<b>\$275K</b>	<b>\$1,650K</b>

### Wake County Housing Major Repair Program

**Match Funding:** Wake County's leveraged funding will come from the Major Repair Program. The County-funded program targets households whose homes have fallen into disrepair, risk condemnation, or may be forced to sell.

**Funding Risks:** The County has chosen to set aside a portion of the property tax rate each year to fund current and future capital expenditures like the Major Repair Program. Dedicating annual revenue streams for the Countywide capital plan is essential for the plan's long-term success, as well as the Major Repair Program. The County adopts a seven-year Capital Improvement Program to be revised and approved annually. Revenues are assigned to planned projects, but projects are continually vetted and subject to change, or ultimately may not be funded.

**Contingency Plans:** The County plans to address this risk by using County-funded Reserve for Future Projects. This reserve is used to balance capital investments across the seven-year plan. In years that the County has more planned revenue than planned capital needs, funding is added to the reserve. The reserve allows for funding of important community needs that develop rapidly, like this project proposal.

### Wake County Housing Community Development Block Grant Public Facilities

**Match Funding:** Wake County's leveraged funding will also come from Community Development Block Grant's Public Facilities and Improvements budget. The Federal-funded program undertakes a variety of public facilities and public improvement projects. This includes infrastructure improvements including streets, curbs, and water and sewer lines. It also includes energy efficiency improvements. This program has been funded nearly every year.

**Funding Risks:** These funds are dependent on HUD's annual allocation for CDBG. Currently, \$190,000 is the planned use for FY25.

**Contingency Plans:** The County is in the middle of revamping this program to provide more meaningful impact in the community, including Wake County's municipalities. There is flexibility in the program design so being awarded the PRICE Main grant could help focus the program. Additionally, the leverage for the County-funded Major Repair Program could be increased by the \$50,000 proposed from CDBG.

### PRICE Replacement Pilot

This application's PRICE Replacement Pilot request is \$10 million. Habitat for Humanity of Wake County can match the request with \$9 million and Wake County Government can match the request with \$1 million. These funds are firmly committed and dedicated to PRICE activities explicitly. The funding is available for the activities directly related to undertaking the PRICE proposal. If the PRICE proposal is funded for a lower amount, Habitat Wake would lower their match to still meet 100 percent. Wake County Government is prepared to match the \$1 million fully.

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Source	FY25	FY26	FY27	FY28	FY29	FY30	Total
Habitat Home Sales	\$1.50M	\$1.50M	\$1.50M	\$1.50M	\$1.50M	\$1.50M	\$9.00M
County AHDP	\$0.20M	\$0.15M	\$0.15M	\$0.20M	\$0.15M	\$0.15M	\$1.00M
<b>Total</b>	<b>\$1.7M</b>	<b>\$1.65M</b>	<b>\$1.65M</b>	<b>\$1.7M</b>	<b>\$1.65M</b>	<b>\$1.65M</b>	<b>\$10.00M</b>

### Habitat Wake County Home Sales

**Match Funding:** Habitat Wake’s match funding will come from home sales. Such revenue is conditioned upon meeting a certain performance obligation, and amounts received are recognized as revenue once the requirement has been met. Once construction is complete on a home and closing procedures have been completed, buyers take possession of the home, and the performance obligation is considered to have been met. Each home sold has a defined purchase price based on a third-party appraisal. Contracts are considered to have commercial substance as they all involve a cash down payment and a signed promissory note, which is paid in accordance with the note terms. In addition, Habitat Wake has made agreements with banks for third-party origination and receives the full loan amount at closing for some mortgages.

**Funding Risks:** Revenue from home sales can vary year to year depending on the number of homes built and whether the loan stays in-house or is sold to a bank.

**Contingency Plans:** Habitat Wake plans to address this risk by using philanthropy matching and fundraising. Habitat Wake has a network of over 50,000 donors, including individuals, organizations, faith congregations, and businesses.

### Wake County Housing Affordable Housing Development Program

**Match Funding:** Wake County’s match funding will come from the Affordable Housing Development Program. The County-funded program helps with construction to permanent gap financing loans to developers to create or preserve affordable rental and ownership housing, including housing for vulnerable populations. The Affordable Housing Development Program has been annually funded since FY 2019, receiving an additional \$5 million annually in FY 2025.

**Funding Risks:** The County has chosen to set aside a portion of the property tax rate each year to fund current and future capital expenditures like the Affordable Housing Development Program. Dedicating annual revenue streams for the Countywide capital plan is essential for the plan’s long-term success, as well as the Affordable Housing Development Program. The County adopts a seven-year Capital Improvement Program to be revised and approved annually. Revenues are assigned to planned projects, but projects are continually vetted and subject to change, or ultimately may not be funded.

**Contingency Plans:** The County plans to address this risk by using County-funded Reserve for Future Projects. This reserve is used to balance capital investments across the seven-year plan. In years that the County has more planned revenue than planned capital needs, funding is added to

the reserve. The reserve allows for funding of important community needs that develop rapidly, like this project proposal.

### **Exhibit G - Long-term Effect**

The core objective of this application's preservation and affordable redevelopment activities is to allow manufactured housing community residents to remain in their communities and eliminate or significantly minimize the risk of displacement, with a focus on allowing manufactured housing community residents to remain in areas of opportunity.

**Retention of other affordable housing opportunities:** Wake County has an affordable housing deficit of 65,860 units; existing affordable housing units face significant demand and would be sought after by displaced residents of manufactured housing communities. Preserving these communities alleviates demand on existing and pipeline units, allowing a greater number of households to be served.

74% of Wake County households earning \$50,000 or less pay at least 30% of their income towards housing cost. It is understood that manufacturing housing offers housing that can often be more affordable than stick built. Allowing manufactured housing residents to remain in their communities will prevent them from having to compete in a broader market where they have a very high chance of being cost burdened.

**Resident stability, ensuring they are not priced out of the community:** Acquisition activities described in this proposal will focus on eliminating displacement risk by either putting communities in the control of their residents – giving residents control over the land underneath their unit – or in the control of organizations committed to long-term affordability and working with community members. Acquisition loans will require recorded deed restrictions enforcing affordability and tenant protections to ensure residents do not face sudden rent increases that will displace them from their community.

Affordable redevelopment will focus on allowing those residents of the redeveloped community who wish to stay to have access to the newly constructed affordable housing. The support provided by Legal Aid of NC described in this application will allow manufactured housing community residents to understand their rights and push back against contract disputes that would displace them.

Wake County has invested in the creation and preservation of over 4,000 affordable housing units since 2019 and will create or preserve at least 3,000 more over the next six years. Wake County and its partners are committed to creating as many affordable housing opportunities as possible to allow County residents to remain in their communities.

**Homeownership:** Resident-led acquisitions of manufactured housing communities will give them ownership of the land beneath their homes. Affordable redevelopment activities will create additional homeownership opportunities accessible to residents of manufactured housing communities. These residents will have access to homebuyer support tools through Habitat, Wake County, the State of North Carolina, and municipal governments.

Households of color are underrepresented among homeowners relative to their proportion of the Wake County population. The legacy of discriminatory policies like redlining are still felt today, and interest rate and supply constraints continue to exclude low-income households and



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households of color from the homeownership market. The affordable redevelopment activities described in this application are intended to create new homeownership opportunities that will specifically target existing residents of the redeveloped community. As nearly two-thirds of manufactured housing residents in Wake County are households of color, it is likely that households of color will benefit from these new homeownership and wealth-building opportunities.

**Livability and Sustainability:** Borrowers of acquisition funds will be required to address existing environmental concerns and mitigate against future risks. These investments will mitigate, flood, wind, heat, and other risks anticipated to result from continued climate change, allowing residents to remain safely housed in their communities.

## **Attachments**

## Attachment A - Advancing Racial Equity

Affordability and race are linked. Historical housing policies created racial disparities in homeownership that persist today. These practices shaped our communities, and they are reflected in the current makeup of our neighborhoods.

### **Steps Taken to Prevent, Reduce or Eliminate Barriers**

Wake County will continue to operate in accordance with Executive Order 13985, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and federal fair housing and civil rights laws.

The Partners will leverage existing networks to innovate and collaborate on the prevention, reduction, and elimination of barriers. One of those networks is A Better Wake. This group began in the summer of 2021 with more than 50 leaders of community-based organizations to develop the **Blueprint to Dismantle Systemic Racism**. The Blueprint comprises more than 40 goals and 150 near-term action items that organizations can take to address systemic racism and is specifically focused on reimagining economic mobility, criminal justice, education, and health systems to create equitable outcomes for Black and Brown residents.

The Partners will also work with the County's Office of Diversity, Equity, and Inclusion to reimagine practices, programs, and policies that create inequitable outcomes for Wake County residents. From interpersonal to infrastructure, ODEI is charged with advancing efforts for inclusive prosperity.

This Fall, the Housing Department and its regional partners will convene to update the adopted the [2020-2025 Regional Wake County Analysis of Impediments to Fair Housing \(AI\)](#) to alleviate housing discrimination and promote fair housing choice. According to the feedback provided during the 2020 Regional AI, race or color was the most common answer specified as the basis for discrimination by landlords. Disability and race were the most common bases for complaint regardless of location in the County. Women, Black residents, and Hispanic residents continue to have disproportionately lower incomes, higher unemployment rates, and higher poverty rates.

### **Measures to Track Progress and Evaluate Effectiveness**

The prior two Analysis of Impacts have included several measures that would be helpful to continue tracking to evaluate efforts to advance racial equity in the preservation and reinvestment for community enhancement of manufactured homes. Two measures that help explain progress are the dissimilarity index and the isolation index. The dissimilarity index measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The isolation index measures the extent that a member of a minority group will interact with only other members of that group.

In 2017, the dissimilarity indices by census tract for all non-White groups in Wake County remained principally at the low end of the moderate range. This means that non-White groups in the County are only somewhat segregated from Whites. The isolation indices for non-Whites, on the other hand, have increased from the low to moderate range since 2013. This means that members of minority groups are increasingly likely to interact solely amongst themselves. The isolation index for Black residents is the highest in the moderate range, indicating that Black

residents are less likely than other groups to live in racially mixed neighborhoods and more likely to be isolated from other races and ethnicities.

Segregation Indices, 2017	Wake County		Cary		Raleigh	
	Dissimilarity	Isolation	Dissimilarity	Isolation	Dissimilarity	Isolation
Black	44.5	55.4	49.3	22.9	54.3	59.8
Asian	47.0	43.3	55.9	25.0	38.2	40.0
Hispanic*	43.6	50.7	49.5	33.8	56.6	55.0

### Barriers to Persons or Communities of Color

In the early 1900s, discriminatory policies were actively enforced, and Raleigh grew into an intentionally segregated city. White families moved into well-resourced neighborhoods north and west of downtown, while Black families were explicitly prevented from moving into those areas through racial covenants. In the early 20th century, the Raleigh School Board decided to transfer all the Black schools in the city to the southeastern section of the city. Simultaneously they designated the newest and best-equipped schools to be whites-only and located them in the far northwestern neighborhoods.

In 2023 Housing published the first [2023 Annual Housing Report](#) to examine each component of the affordable housing crisis and the initiatives bringing our community closer to safe, decent, affordable housing. While we celebrate recent achievements in affordability, we must recognize the century of history creating our current systemic context. Due to this history of imbalanced investments and exclusionary access, Black, Indigenous and Latino/Hispanic households are disproportionately impacted by rising housing costs because they are more likely to have low-incomes, experience housing cost burden, live doubled-up or in overcrowded housing, and experience homelessness.

For Wake County, Black residents represent 21% of the population, yet account for 67% of people experiencing homelessness at any given time and only represent 13.2% of homeowners and 30.7% of renters. Black households are underrepresented among homeowners and overrepresented as renters. Conversely, White residents make up 67% of Wake County's population, but 71.7% of homeowners and 50.1% of renters.

AMI by Race		
The table below shows the difference in AMI by race of Wake County residents.		
Race	Median Income of Racial Group in Wake County	Percentage of Area Median Income
White	\$101,086	104% AMI
Black	\$55,473	54% AMI
Native American	\$65,636	67% AMI
Asian	\$135,046	138% AMI
Native Hawaiian or Other Pacific Islander	\$101,847	104% AMI

**Racial Composition of Those Expected to Benefit**

Local data continues to confirm housing barriers disproportionately affect non-white and Hispanic populations. Hispanic households make up more than one-third of manufactured home householders even though they only represent 8% of all households. In contrast, White households make up more than one-third of all manufactured householders, but 68% of all households. Similarly, Black residents make up one-fourth of manufactured home householders while representing 19% of all households showing manufactured homes represent the accessible and available housing typology for minority populations in comparison to White households. By preserving MHCs, Wake County will protect a gentrifying portion of the housing stock and stabilize naturally affordable housing for black and brown communities.

**Attachment B - Affirmative Marketing**

Accessibility of public information is a key factor in the ability of residents to engage in public programs. The objective of the Wake County Affirmative Marketing Policy is to ensure federally funded projects employ marketing plans that promote fair housing by ensuring outreach to all potentially eligible households, especially those least likely to apply for assistance. The desire is for all Wake County projects, subrecipients, and project owners to reflect and encourage the diversity of our community.

The Partners will comply with this policy to affirmatively market housing and programs described in this grant. Marketing will occur throughout Wake and Johnston counties to any demographic groups that would be unlikely or least likely to apply absent such efforts. All partners will broadly advertise PRICE funded housing and programs in their offices, as well as on their websites, social media, and print media. Accommodations for the visually, or hearing impaired, as well as non-English speaking residents, will be available.

In preparation for this grant opportunity, Wake County Housing reached out to all MHCs and municipalities within the county jurisdiction to solicit feedback on need and interest in assistance. Wake County also met with the North Carolina Manufactured and Modular Homebuilders Association. These contacts will be used to facilitate information about housing and service programs funded through the PRICE grant.

Wake County also employs a Housing Community Engagement Specialist who informs trusted community contacts and service providers of housing and homeless services available to eligible populations. This staff person will engage MHC residents and those eligible for affordable housing in MHC to share the PRICE funded programs.

**Affirmative Marketing Outreach:** Wake County Housing and partners shall advertise every solicitation in at least two outlets or venues, which may include:

- Postings at: Public Housing Authorities, Community Centers, Public Libraries, Websites, Community newsletters, Local Businesses, Community Bulletins
- Paid advertisements in or on: Newspapers, appropriate internet sites, radio, and television

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

The County's Fair Housing and Equal Opportunity Policy prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18), and people with a handicap (disability).

The Housing Affordability and Community Revitalization Department of Wake County and every office of a HUD Entitlement recipient, sub-recipient, or Community Housing Development Organization ("CHDO") shall:

- In a prominent place, display the Equal Housing Opportunity logo.
- In a prominent place, display at least one Fair Housing Poster.

Every advertisement to sell or rent housing supported with HUD Entitlement funds shall contain the Equal Housing Opportunity logo, or the following statement:

*"Equal Opportunity Housing. This housing is offered without regard to race, color, national origin, sex, religion, familial status, or disability."*

Every solicitation, solicitation for bids, request for proposals, or request for qualifications (collectively "solicitations") issued by the Housing Affordability and Community Revitalization Department of Wake County, and/or every HUD Entitlement recipient, sub-recipient, or CHDO shall contain the following statement:

*"Wake County Housing Affordability and Community Revitalization welcomes, encourages and supports the response and active participation of qualified firms owned by minorities and/or women."*

Affirmative Marketing Outreach: HACR and/or every HUD Entitlement recipient, sub-recipient, or CHDO shall advertise the sale or availability of rental housing in at least two outlets or venues. Every HUD Entitlement recipient, sub-recipient, or CHDO shall inform and solicit applications from persons in the housing market area who are least likely to apply for the housing without special outreach.

Every HUD Entitlement recipient, sub-recipient, or CHDO shall maintain a file of all advertisements and solicitations required under this section and shall provide to Wake County, at contract close or at the annual contract anniversary date, a copy of all advertisements and solicitations.

Every HUD Entitlement recipient, sub-recipient, or CHDO shall provide to Wake County, at contract close or at the annual contract anniversary date, the following data on the results of solicitations for goods or services for any program or development which utilized HUD Entitlement funds:

- Number of responses to solicitations.
- Number of responses that were qualified minority or women owned firms.



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- Number of awards to qualified minority or women owned firms.

This Affirmative Marketing Policy shall be included by reference in the following documents:

- All Solicitations to Bid, Request for Proposals, or Requests for Qualifications involving HOME or CDBG program dollars.
- All program manuals for programs that utilize HOME or CDBG dollars.
- All applications to receive funds that include HOME or CDBG dollars as a funding or financing source.

The Fair Housing Project, part of Legal Aid of North Carolina, is a statewide program with an office in Raleigh that provides education and outreach on fair housing issues. In addition to their educational efforts, the Fair Housing Project provides legal representation, advice, referrals, and information to individuals statewide who have experienced housing discrimination. When necessary, staff can assist in filing a complaint with HUD FHEO or other appropriate administrative or judicial bodies. Legal Aid of North Carolina is a critical partner in the PRICE grant programming.

The City of Raleigh Fair Hearing Board was established through the City's Fair Housing Ordinance, which empowers the Board "to provide for execution within the City of Raleigh of the policies embodied in Title VIII of the Federal Civil Rights Act of 1968 as amended." The City's ordinance prohibits discrimination in housing opportunities on the basis of race, color, religion, family status, disability, national origin or sex. The ordinance describes discrimination in real estate transactions, discrimination based on disability, discrimination in residential real estate related transactions, and discrimination in the provision of brokerage services.

The Hearing Board works to improve public awareness of Raleigh's Fair Housing Ordinance. Housing complaints from residents are received by City staff who support the Hearing Board. Each complaint is documented to capture information (name, contact information, demographics, nature of complaint, property type, veteran status, basis of discrimination, referral information). Many of the calls received are tenant/landlord issues. When there is a possibility that an issue rises to the level of housing discrimination, then the caller is referred to NCHRC, the North Carolina Justice Center, or Legal Aid of North Carolina. The Hearing Board works closely with the NCHRC for staff training on complaint intake; however, complaints would be turned over to NCHRC for enforcement. The Hearing Board works to across Raleigh and throughout Wake County through established partnerships, including the Urban County and Cary, along with Raleigh Housing Authority and the Housing Authority of the County of Wake.