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## **Exhibit A**

### **Executive Summary**

Santee-Lynches Regional Development Corporation in partnership with the Pee Dee Regional Council of Governments and the Manufactured Homes Institute of South Carolina (herein referred to as “The Partnership”) would like to formally present this proposal for consideration for award of the **Price Main competition**.

Through The Partnership, and successful award of proposal, we plan to create a program that will not only preserve existing manufactured homes but also repair and create much needed additional affordable housing in the region. The Partnership comes with a three-prong approach to address the factors addressed in the Notice of Funding Opportunity:

- Advocate for land use regulations that increase manufactured housing development areas while educating local and elected leadership on the benefits of these properties
- Create a repair and preservation program to rehab or replace units within the region
- Rejuvenate defunct MHC to create additional low-income housing ownership possibilities

All partners involved are experienced in HUD programs and plan to use existing knowledge from the HUD HOME program to efficiently manage the goals presented. Additionally, partners involved have successfully completed numerous design and build projects, buyer financing, buyer assistance education, and community outreach for affordable housing programs.

The approach presented aims to target the regions foremost critical priorities in housing: retention, new ownership, financing, increasing housing stock, and long-term affordability in real estate for those in the low-income arena. By addressing these issues, we provide viable opportunities to those in the target demographic and also become a step closer to shrinking the wealth gap so prominent in rural South Carolina regions.

If awarded, this funding will provide stable and safe affordable housing for existing homeowners and renters alike while also creating possibilities of homeownership for those previously unable to obtain this status through traditional means. This partnership is dedicated to the long-haul solutions for better housing and helping those who have been overlooked and underserved in the past.

### **South Carolina Exhibit B:**

#### **Threshold Requirements and Other Submission Requirements**

##### 1. Resolution of Civil Rights Matters

As of the submission date of this application, The Partnership:

(1) Has not received charges from HUD concerning a systemic violation of the Fair Housing Act or receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair

housing law proscribing discrimination because of race, color, religion, sex (including sexual orientation and gender identity), national origin, disability or familial status;

(2) Does not have status as a defendant in a Fair Housing Act lawsuit filed by the United States alleging a pattern or practice of discrimination or denial of rights to a group of persons

raising an issue of general public importance under 42 U.S.C. 3614(a);

(3) Does not have status as a defendant in any other lawsuit filed or joined by the Department of Justice, or in which the Department of Justice has intervened, or filed an amicus

brief or statement of interest, alleging a pattern or practice or systemic violation of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the

Housing and Community Development Act of 1974, the Americans with Disabilities Act, Violence Against Women Act, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally including an alleged failure to affirmatively further fair housing;

(4) Is not in receipt of a letter of findings identifying systemic non-compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974; Violence Against Women Act; or the

Americans with Disabilities Act; or

(5) Is not in receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law prohibiting discrimination in housing based on sexual orientation, gender identity, or lawful source of income.

2. Application was submitted timely by July 10, 2024 @ 12:00PM.

3. Eligible Applicant Identification- Santee-Lynches Regional Council of Governments: 25 (Others) Multi-Jurisdictional Entity

4. One Application for the PRICE Main category has been submitted.

#### **Standard Application, Assurances, Certifications and Disclosures**

a) Standard Form 424 (SF-424) Application for Federal Assistance (attached)

b) Assurances (HUD 424-B) (attached)

c) Federal Assistance Representations and Certifications (attached)

d) Budget Form (424-CBW) (attached)

e) Assurances for Construction Programs (SF-424D) (attached)

f) Applicant Disclosure Report Form 2880 (HUD 2880) (attached)

g) Disclosure of Lobbying Activities (SF-LLL) (attached)

h) Certification of Lobbying Activities (attached)

i) Affirmatively Furthering Fair Housing (attached)

j) Code of Conduct- The Partnership follows the requirements of 2 CFR 200.317 for all procurement, a separate Code of Conduct is not required.

k) Affirmatively Furthering Fair Housing

See Attachment C for The Partnership's Affirmatively Furthering Fair Housing narrative.

#### **Other Program-Specific Requirements**

a) Fair Housing and Nondiscrimination

The Partnership adheres to HUD's general non-discrimination and equal opportunity requirements along with Title VI regulations in the conduct of all programs

b) Limited English Proficiency (LEP)

Attachment B, Affirmative Marketing Narrative, describes how The Partnership will meet LEP requirements in marketing efforts. The Partnership will further ensure that all public-facing materials are accessible to non-English speakers.

c) Physical Accessibility

The Partnership will ensure that reasonable accommodations are available at all public meetings, and will offer alternative means of communication if necessary.

d) Environmental Review

The Partnership will conduct all required Environmental Reviews in compliance with the requirements of 24 CFR part 50 or 58.

e) Affordability

The Partnership will comply with the minimum affordability requirements of the HOME program found at 24 CFR 92.252(a), (e), and (f) and 24 CFR 92.254(a)(1)-(4)..

## Exhibit C

### Need

The **project area** proposed consists of ten (10), primarily rural, counties in South Carolina. The geographical area incorporates the following counties and is shown in *Appendix A*:

- Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro (Pee Dee Region)
- Clarendon, Lee, Kershaw, Sumter (Santee-Lynches Region)

Within this region, more individuals and families are struggling to meet their basic need for shelter. According to the most recent federal data, nearly a quarter of South Carolina rental households spend more than half of their income on housing. This means that the average renter cannot afford a basic two-bedroom apartment. These factors are combining to intensify the state's eviction situation, in which there was one filing for every four renters in 2019 – increasing the likelihood that even more families will be displaced or possibly face homelessness.

The dynamics of the state's demographics, economy, and real estate market are such that housing in South Carolina is becoming less affordable and attainable over time. The costs of ownership and renting are both far outpacing income, and the inventory of affordable homes is exceedingly small.

Many renter households in the region experience severe cost burdens, meaning that they spend more than half their gross income on rent or have no income at all. This represents 24 percent of all renters in the 10-county region. (*Appendix B*)

The average renter in the region cannot afford a basic two-bedroom apartment without overextending their budget, and most workers in the state's most common occupations are similarly distressed. The average resident in the region seeking to rent a two-bedroom apartment at HUD fair market rent without spending more than 30 percent of their income must make \$17.30 per hour, which NLIHC calls the "housing wage," but the average hourly wage of the rural SC renter is only \$13.52 with some average wages at \$7.90 in the region. (*Appendix C*)

There are 72,565 rental homes at 1,562 properties with federal affordability restrictions statewide, slightly more than reported in 2019. This includes recipients of funding from HUD or U.S. Department of Agriculture (USDA) Rural Development programs plus projects awarded LIHTC financing while excluding Housing Choice Vouchers or other tenant-based assistance. This is still only enough affordable housing to serve one in five of South Carolina's 362,890

renter households. This situation becomes more extreme when looking at the duration of affordability periods left on many. Four percent of publicly supported rental homes face an expiring affordability restriction in the next five years and 2,349 public housing units need immediate investment. Additionally, 36% of publicly supported rental homes with expiring affordability restrictions in the next five years are assisted by Low Income Housing Tax Credits. This movement in affordability periods is forecasted to have a possible impact on 51,678 affordable rental homes statewide which would displace over 91,000 extremely low-income families. (*Appendix D*)

Additionally, the South Carolina Revenue and Fiscal Affairs Office estimates from the ten counties in the combined region all reflect higher average percentages than the State's, for total housing units being mobile homes. (*Appendix G*)

These estimates also indicate a sharp decrease in the number of manufactured homes currently available. This decrease is the outcome of local initiatives to demolish homes in poor condition. Many of the homes were abandoned and in disrepair. Unfortunately, local development has not replaced these homes and now the region has assumed a loss of over 5000 manufactured housing units since 2015.

### **Distressed Communities:**

All counties included in this regional project include distressed area criteria. From the state level, these counties are easily identified in the DCI mapping color coded tool (*Appendix E*). At the county level most areas are listed as severely distressed with only a few in comfortable or moderate distress levels.

The ten-county project area not only identifies as distressed, but also much of the area is very rural. Housing issues in rural communities get overlooked as living and housing costs tend to be lower here than in the cities. Income in much of this area tends to be lower as well, especially in the areas that rely on the agricultural industry or that otherwise have limited job opportunities. Along with low incomes, developers find it difficult to get financing in our rural area. The already limited number of firms specializing in affordable rental housing is even smaller when it comes to our rural market. The rental housing developments are significantly smaller than the urban counterparts and financing these units tends to be more costly with more obstacles to finishing a project. This issue is compounded in the area with the lack of adequate infrastructure including water and sewer. These infrastructure issues have made rental housing more expensive and less attractive for possible developers who often opt to locate in more urbanized areas with existing infrastructure.

### **Barriers to manufactured housing preservation or revitalization in project area:**

In the proposed project area, numerous counties and municipalities have land use controls that prevent the placement of manufactured homes outside of the regulated areas. To compound this issue, home prices in South Carolina are rising overall. Median home prices are up 5% since March 2023 and up 28% in the past 3 years. US Census Bureau 2018-2022 data reflects the median value of owner-occupied housing as \$216,200, and the median monthly owner costs as \$1,423.

Across South Carolina, and especially rural areas there is a shortage of rental homes affordable and available to extremely low-income households (ELI), whose incomes are at or below the poverty guideline or 30% of their area median income (AMI). Many of these households are severely cost burdened, spending more than half of their income on housing. Severely cost burdened poor households are more likely than other renters to sacrifice other necessities like healthy food and healthcare to pay the rent, and to experience unstable housing situations like evictions. According to 2022 ACS PUMS there are 150,598 or 25% renter households that are extremely low income. The average income limit for a four-person extremely low-income household is \$28,190, leaving 73% of extremely low renter households with severe cost burdens. Thirteen percent of extremely low-income renter households include a single adult caregiver, 53% of whom usually work at least 20 hours per week. Eleven percent of extremely low renter households are enrolled in school, 48% of whom work at least 20 hours per week.

In South Carolina, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,117. In order to afford this level of rent and utilities — without paying more than 30% of income on housing — a household must earn \$3,723 monthly or \$44,674 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into an hourly Housing Wage of \$21.48/hour. South Carolina’s minimum wage is \$7.25, while the average renter wage is \$17.08. Broken down, it would require 118 Work Hours Per Week At Minimum Wage To Afford a 2-Bedroom Rental Home (at FMR); 103 Work Hours Per Week At Minimum Wage To Afford a 1-Bedroom Rental Home (at FMR); 3.0 Number of Full-Time Jobs At Minimum Wage To Afford a 2-Bedroom Rental Home (at FMR); and 2.6 Number of Full-Time Jobs At Minimum Wage To Afford a 1-Bedroom Rental Home (at FMR). (*Appendix I*)

Barriers identified in the proposal are as follows:

- Land use and planning regulations. Many local municipalities do not allow new setup of manufactured homes within their city limits which limits development of affordable properties for manufactured home use.
- Stigma surrounding mobile/manufactured homes. Many older manufactured homes in the area show their inferior quality of build and hamstring the introduction of newer manufactured homes because of a belief that new products will be of the same low quality.
- Financing options are limited. Financing of manufactured homes is difficult with limited organizations that offer this product. Additionally, issues with titling and forming real property need to be navigated by experienced partners.
- Access to quality rehab/repair vendors. Many un-licensed individuals perform repair work that is sub-par and creates ongoing issues for existing homes. Availability of certified manufactured home parts and rehab is not always available to a homeowner.

These barriers create a steep climb to embracing manufactured homes. However, this style of housing has the potential to offer homeownership to those who would otherwise be ignored, repair/rehab for those aging in place, and prolonged access to attainable, affordable, and stable housing. Price points in manufactured housing could help this proposal become a catalyst for future MHC expansion.

## **Exhibit D**

## Soundness of Approach

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

**Visions, Goals and Eligible Activities:** If awarded PRICE funding, The Partnership will use existing data collected from local Area Associations on Aging (AAA's), existing list of homes from data collection around the HOME program, and request received from public outreach events and publications with local governments and non-profits. The Partnership's goals are to use funding to effectively increase the affordable housing stock available for low-income and very low income persons in all communities (urban or rural), to preserve existing manufactured housing stock, to replace unstable (deteriorated/dilapidated) housing stock, to provide assistance for aging residents to make modifications to age in place, to educate elected leadership and residents of communities about the benefits of utilizing manufactured housing as a tool to increase affordable housing, and to make a one-time funding source relevant for years to come through the creation of an Revolving Loan Fund dedicated to manufactured housing solutions. One such solution for the RLF is the acquisition of an existing parcel which is an abandoned MHC within Sumter County, SC. This 18.6-acre parcel was utilized as a MHC from 1993 until 2006 but has since been forfeited to the land commission of Sumter County. Utilizing the parcel allows the project a head start as the land will be transferred at little to no cost to Santee-Lynches from the county, which will also place the land back onto the county's tax record.



In the past, the MHC utilized a 7-acre sewage lagoon or effluent pond. This will be eliminated and made sustainable by installing septic tanks. The lagoon will then be decommissioned. Plans for the lagoon are undetermined. The pond may be filled with soil and utilized for future lot development or may be allowed to remain bowl shaped and used as a fishpond once closeout has been completed through SCDHEC.

The remaining 11-acres of the property's existing infrastructure includes ingress/egress, three paved lanes, naturally sloping drainage and defined lots. The aged infrastructure to be rehabilitated will include roads, drainage improvements, appropriate home site clearing and site redevelopment.

Restoration and improvements to existing utilities will include water, sewer and electricity. The rehabilitation of the existing utilities will be essential to provide reliable services that focus on resiliency, sustainability, and enhanced livability. Installation of new utility lines and utility hookups will be completed. Broadband will also be installed and made available to all lots.

The following activities will be eligible for owner occupied and tenant occupied projects:

- Preservation and revitalization activities – repair, rehabilitation, or replacement of manufactured housing units. Pre-1976 manufactured homes will be replaced with a new housing unit. Manufactured homes determined to not be financially feasible for rehabilitation, those with repairs estimated at over 95% of the current home value, will be replaced in the same manner as Pre-1976 homes. Rehabilitation includes completing an inspection and necessary repairs to bring the home to all local and state building codes. Rehabilitation will also include special modifications for individuals who are disabled or aging in place and energy efficiency improvements; and
- Acquisition of an abandoned manufactured housing community; and
- Development and improvement of infrastructure to support the revitalization of the acquired MHC; including roads, sidewalks, water and wastewater infrastructure, broadband, and utility hookups; and
- Legal expenses to quiet title to correct heir’s property; and
- Environmental mitigation and resilience improvement activities to acquired MHC and others identified; and
- Forgivable down payment assistance for purchases of MH units and/or land purchase; and
- Resident and community services including homebuyer counseling and relocation assistance; and
- Planning activities to address zoning and land use restrictions; and
- Revolving Loan Funding for sustainable future housing needs; and
- Program administration.

**Timeline and Key Tasks:**

Key Task	Description	Timeline
PRICE Program Development	Create application, application manual with scoring and threshold criteria, training materials, forms, reports, written agreements, loan documents and restrictive covenants	October 2024 – January 2025
Post draft of PRICE Application Manual, Application and associated documents for public comment	Post draft application materials on the website for public comment. Evaluate comments, finalize application materials, and announce application deadline	January 2025

Host Competitive PRICE RFQs for Contractors	Identify contractors who meet required qualifications to submit proposals for a project(s).	February 2025- March 2025
Environmental Reviews	Provide information to in-house planning staff on PRICE requirements, evaluation of submitted environmental reviews, send tribal letters, post, provide to HUD for posting and issue Authority to Use Grant Funds, and complete HEROS work-up	March 2025 – December 2025
Partnership 100% Obligation Deadline	Draft of written agreements, establish program completion standards, legal review, execution, set up activities and fund in IDIS system	December 2025 – January 2026
HUD PRICE Obligation Deadline		September 2027
Partnership 50% Expenditure Deadline	Evaluate Subrecipient performance against standards de-obligate and re-allocate funding if necessary	January 2028
Partnership 100% Expenditure Deadline	Evaluate Subrecipient performance against standards, de-obligate and re-allocate funding if necessary	January 2030
Compliance Monitoring Reviews	Periodic on-site reviews of RLF files for compliance, physical property inspections for completed work on units and infrastructure	Periodically and ongoing
Partnership Program Close-Out Deadline	Report project completion data into IDIS, reconciliation of expenditures and program income, subrecipient monitoring (program close-out monitoring)	January 2030- September 2031
Period of Grant Performance Expiration (HUD 100% Expenditure Deadline)		September 2032

**PRICE Budget:**

The Partnership is requesting \$15 million in PRICE funding including 10% set aside for program administrative expenses. If awarded, this funding will remain available for PRICE projects throughout the entire period of grant performance, ending on September 30, 2032.

To maximize the impact of program funding the partnership will initially acquire and rehabilitate a dilapidated MHC which currently is held by a local county in foreclosed land trust. This initial expenditure will pave the way for 100 new homes with corresponding infrastructure. This portion of the project will run simultaneously with the preservation and repair side of the program while also vetting, and approving, those who apply for home ownership.

PRICE Main Funding	\$15,000,000
Administration (10% of PRICE)	\$1,500,000

Total Funding Available for PRICE Projects	\$13,500,000
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**Projected impacts of PRICE activities if implemented:**

The Partnership projects that the \$13,500,000 million will allow for a significant number of manufactured homes to be acquired, replaced, rehabilitated, and improved with accessibility and resilience modifications. Households that receive assistance to acquire manufactured homes will have affordable monthly housing expenses, opportunities to build wealth, and experience housing stability. Providing down payment assistance loans and full home mortgages through a Revolving Loan Fund (RLF) to acquire manufactured housing units and lots will provide valuable opportunities for underserved people of color to overcome barriers that have prevented them from becoming homeowners, such as the rising costs of land and financing, especially in areas of distress. Additionally, the creation of a mobile home RLF creates a long-term impact from the funds awarded. Once repaid, these loans can then be redistributed to more projects with the same goal of developing housing stock. This dedicated “re-serve” of funds allows for ongoing housing development instead of limited funding which band aids an issue. Homeowners that receive assistance in making repairs, accessibility improvements, energy efficiency, and aging in place will have homes that are stable, safe, and meet their specific needs while being current on all local and state building codes. Many seniors will see the benefit of being able to age in place and remain in their communities in lieu of having to move into expensive assisted living and/or residential care facilities. The ability to remain at home will keep their monthly housings costs affordable, which in return, will allow them to stretch their retirement savings further. Tenants leasing PRICE-assisted units will benefit from affordable rents, improved housing quality, lower utility bills from energy efficiency improvements, and an increase in housing durability from resiliency improvements. In general, occupants of PRICE-assisted units whether they are tenants or homeowners will see significantly improved living conditions and an improved quality of life.

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

The partnership will require that all households assisted with PRICE funding are 80% and below area median income for the household size and the county they are located in. Awarded applicants will be required to certify each household’s income in accordance with 24 CFR Part 5.609. To ensure rents are affordable, the partnership will use existing guidelines from the rent restrictions of the HOME Investment Partnerships program, which we are currently a participating jurisdiction. In addition, members of the partnership will implement underwriting criteria for homeownership activities to ensure monthly mortgage payments (principal, interest, taxes and insurance) do not exceed 30% of the household’s gross monthly income. All homeownership activities will require units to be affixed with a permanent foundation.

The affordability of housing assisted with PRICE funds will be secured through contractual agreements for the length of the affordability period. All property assisted will remain affordable for twenty years. Financial assistance for rental properties will be secured by the use of a note, mortgage, and restrictive covenant. The restrictive covenant will run with land and will contain language restricting the occupancy of the property to low-income households earning 80% and below area median income, rents will be restricted to the HUD published rents for the HOME program and require the property to be maintained in accordance with HUD’s INSPIRE property standards and all other local codes.

Financial assistance provided for homeownership activities (homebuyer and homeowner) will be secured using a note and mortgage for a minimum term of twenty years. The partnership will require that homeownership assistance is provided utilizing the recapture requirements of the HOME Investment Partnerships Program. The amount of assistance required to be repaid if the homeowner sells the home or ceases to use it as their principal residence prior to the expiration of the twenty-year affordability period will be reduced on a prorated basis for the period of time the homeowner occupied the unit as their principal residence. This will enable homeowners to recoup as much equity as possible from their investment and provide opportunities to build wealth. Prorated forgivable loans will also be used to provide financing to owner-occupied homeowners to rehabilitate their homes and bring them into a safe and habitable condition. This will alleviate the financial burden and stress they face being unable to afford the repairs needed to preserve their homes.

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

The Partnership is very familiar with resistance to the impacts of environmental hazards and reducing vulnerability to natural hazards as the two partnering regions are required to write the Hazard Mitigation Plans for the ten-county region.

Each county and municipality established specific goals pertinent to their respective jurisdiction, in order to mitigate potential hazards. Normally, funding is a critical factor in accomplishing some of the goals; however, proactive initiatives in seeking grants and or other funding sources have proven successful. A synopsis of the multi-jurisdictional Regional Goals is provided below:

1. Ensure the protection of critical facilities.
2. Increase public education and awareness of natural hazards.
3. Ensure that the availability and operation of infrastructure will not be significantly disrupted by a natural disaster.
4. Reduce the potential impact of natural disasters on new and existing development.
5. Ensure that emergency shelters have adequate capacity and resources.
6. Reduce the impact of wildfires on homes, buildings, critical facilities, and infrastructure.
7. Reduce the impact of severe winds on homes, buildings, critical facilities, and infrastructure.
8. Reduce the impact of floods on homes, buildings, critical facilities, and infrastructure.
9. Ensure the protection and functionality of Communications.
10. Facilitate the preparedness of Emergency Response.

This document becomes a living document meant to be reviewed and updated as vulnerabilities are discovered or new methods to mitigate hazards are suggested. Furthermore, various portions of this document are pertinent for planners and municipal officials to consider incorporating into other planning / municipal documents such as comprehensive plans, zoning ordinances, transportation plans, economic development plans, etc.

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

To educate the public about PRICE funding and its possible effects in South Carolina, the Partnership organized a public hearing and a fifteen-day public comment period. To give everyone who wants to participate and offer feedback as many opportunities as possible, the public hearing was conducted virtually in addition to in person.

To obtain feedback regarding the PRICE program from a varied array of stakeholders, The Partnership will broadcast information regarding the PRICE program and funding through several marketing channels. The Partnership has developed a robust network of partners and stakeholders through the administration of numerous programs. These partners include but are not limited to other state agencies, municipalities, counties, councils of government, non-profits, lenders, developers, and financial institutions.

To align our proposal with existing community plans and policies, The Partnership will request recommendations from counties, municipalities, and government councils to create a network of local partners to carry out PRICE program activities in their areas, should it be selected for funding. These requested recommendations would vary from different networking means such as public hearings, public comment periods, community and town hall meetings, needs assessment and surveys.

### **Exhibit E Capacity**

The Santee-Lynches and Pee Dee Councils of Governments, along with Manufactured Housing Institute of South Carolina have numerous years of governmental and private sector experience in affordable housing programs including project development, MHC development, MHC repair, loan oversight, third party financing, and counseling for new homebuyers. This experience has been gained through existing HUD programs at the state and federal level that we are engaged in and also includes local and third-party technical assistance projects. This partnership has an experienced team with a mission of creating affordable housing opportunities for the citizens of the ten-county region. HUD Community Development programs administered by members of the partnership include the HOME Investment Partnerships Program (HOME), HOME Investment Partnerships Program American Rescue Plan (HOME-ARP). Other programs similar to PRICE administered by members of the partnership include the Neighborhood Initiative Program (NIP), which was a blight removal and foreclosure prevention program funded through the U.S. Department of the Treasury and the SC State Housing Trust Fund Program. Additionally, partnership members oversee numerous large scale redevelopment projects that focus on those most in need through improved infrastructure, economic development, and transportation funding received from local, state, and federal levels.

### **Exhibit F Match or Leverage**

This section is not applicable.

### **Exhibit G Long-Term Effect**

Long-term Effect Research consistently shows the negative health impacts on residents living with poor housing conditions. An article published by the National Library of Medicine states, “Housing is an important determinant of health, and substandard housing is a major public health issue.<sup>1</sup> Each year in the United States, 13.5 million nonfatal injuries occur in and around the home,<sup>2</sup> 2900 people die in house fires,<sup>3</sup> and 2 million people make emergency room visits for asthma.<sup>4</sup> One million young children in the United States have blood lead levels high enough to adversely affect their intelligence, behavior, and development.<sup>5</sup> Two million Americans occupy homes with severe physical problems, and an additional 4.8 million live in homes with moderate problems.<sup>6</sup>

Through this proposal, The Partnership seeks to assist households living in manufactured homes to avoid the long-term negative impacts created by their substandard homes.

The Partnership will ensure the long-term affordability of all units assisted with PRICE funds by recording restrictive covenants or similar documents that meet the minimum requirements of the HOME Program at 24 CFR 92.252(a), (e), and (f) (rental housing) and 24 CFR 92.254(a)(1)-(4) (homeownership). The addition of new, and rehabilitation of existing manufactured housing will ensure that older homes are structural and functionally sound and able to remain habitable for years to come. New homes placement will achieve projects goals of increasing housing units in region or improved housing atmosphere for those currently in sub-standard living conditions. These improvements also help to control climate aspects by improving and reducing energy consumption and lower the overall carbon footprint of housing units involved in this program.

This proposal is designed to increase the quality of life for those residing in manufactured homes while also increasing available quality housing stock and home ownership across the project area. Extending the longevity of existing housing will help to reduce cost for those currently in a home through improved energy usage and keep housing costs down for new tenants by growing housing stock.

The RLF will continue this trend by recycling money for years to come. The specialized RLF will stay in play well beyond the proposed funding's closeout date and keep regional stakeholders able to offer funding and expansion of affordable manufactured homes indefinitely. This innovative part of the proposal will act as an ongoing option for those interested in homeownership and development of affordable housing.

### **Attachment A Advancing Racial Equity Narrative**

The partnership's equity action plan focuses on systemic racial discrimination, advancing equity in the agency's activities, and improving outreach and access to underserved communities. The plan accomplishes this by 1) improving resident access to the projects application process so that individuals in rural areas, with inflexible schedules or with limited digital resources can use all partners resources with greater ease, which will impact communities who are disproportionately Black, Hispanic and Native American; 2) engaging with a broad range of NGO's, higher education institutions, faith based organizations, and civil rights organizations to support diversity, equity, inclusion and accessibility; 3) further developing the partnership's data collection and analysis to support effective use of resources and to empower individuals to access those resources; and 4) continuing to improve access to partnership's resources for people whose primary language is not English or who have limited proficiency in reading or accessing digital resources.

## **Attachment B Affirmative Marketing Narrative**

Establishing a marketing strategy to draw in income-eligible prospects and demographic groups that might not typically look for housing in their project is the goal of an affirmative marketing plan. Regardless of protected class, The Partnership is dedicated to serving the state's demographic populations. The racial makeup of beneficiaries in The Partnership's current programs and services reflects a very diverse range of individuals receiving support from the organization.

No preference is given to any particular segment of the population with rental housing projects, manufactured homes and MHCs funded by PRICE program funds. Pursuant to 24 CFR 92.253(d)(3), an owner of a rental housing project or manufactured home assisted with PRICE program funds must comply with the affirmative marketing requirements established by the Sumter County HOME Consortium in accordance with 24 CFR 92.351(a). The owner of the rental housing projects, manufactured homes and MHCs must adopt and follow the written tenant selection policies and criteria, which include that it may give a preference to a particular segment of the population if permitted in its written agreement with the PJ such as persons with a disability or other special needs.

Currently, there is no preference for persons with a disability or special needs groups, however PRICE funds must target low- to moderate-income households at or below 80% AMI. The Partnership does not discriminate and provides equal access to all eligible households in the PRICE program.

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

This holds true for everyone, irrespective of their national origin, race, color, religion, sex, disability, or family status. It also pertains to people whose limited English proficiency (LEP) prevents them from fully and meaningfully engaging in federally funded and managed initiatives.

Advances in the state's affirmatively furthering fair housing have been impacted by local government zoning, code regulation, infrastructure requirements, and resource barriers, as stated in the State of South Carolina's Analysis of Impediments.

Due to these issues, there is little room for new residential development, rehabilitation of existing homes faces difficulties (particularly when it comes to necessary accessibility modifications), and the need for affordable housing is perceived negatively in many communities throughout the state. A part of any award made under this NOFO will go toward providing technical support, such as training on reasonable modifications and accommodations and accessible design, to nonprofit organizations doing repairs made possible by the funding.

**Attachment D**  
**Eligible Applicants Documentation**

All required information regarding The Partnership's eligibility is included in Exhibit B: Threshold Requirements.

**Attachment E**  
**Evidence of Partnership**

**Attachment F**  
**Match or Leverage Documentation**

This section is not applicable.

**Attachment G**  
**PRICE Certifications and Standard Forms**

Appendix B.III Multi-Jurisdictional Entity

**PRICE CERTIFICATIONS MULTI-JURISDICTIONAL ENTITY APPLICANTS**

The multijurisdictional entity certifies that:

**Affirmatively Further Fair Housing** – The jurisdiction(s) will affirmatively further fair housing.

**The Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended (URA), and Residential Anti-displacement and Relocation Assistance Plan (RARAP)** -- It will comply with the acquisition and relocation requirements of the URA (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR part 24. As applicable, it has in effect and is following a RARAP as required under 24 CFR part 42 in connection with any activity assisted with funding under either the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdictions' knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Applicant** – The submission of the PRICE application is authorized under State and local law (as applicable) and the jurisdiction(s) possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Section 3** – It will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

**Build America, Buy America (BABA)** – It will comply with Title IX, subpart A of the Infrastructure Investment and Jobs Act of 2021 (41 U.S.C. 8301 et seq.).

**Public Participation** – It is in full compliance with the PRICE streamlined public participation requirements found in Section VI.E of the PRICE NOFO.

**Community Development Plan** – If any member(s) of the multijurisdictional entity applicant is a recipient of funding under Title I of the Housing and Community Development Act of 1974, the entity certifies that its consolidated plan identifies community development and housing

needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR parts 91 and 570.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with PRICE funds, it has developed its PRICE proposal to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The PRICE proposal may also include PRICE-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional PRICE Certification).
2. **Overall Benefit.** PRICE funds shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons.
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with PRICE funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if PRICE funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with PRICE funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than PRICE funds. In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than PRICE funds if the jurisdiction certifies that it lacks PRICE funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing, as applicable:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K and R; and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

**Compliance with RFRA**-- The grant will be conducted and administered in conformity with the requirements of the Religious Freedom Restoration Act (42 U.S.C. 2000bb) and 24 CFR 5.109, allowing the full and fair participation of faith-based entities.

**Compliance with Laws** -- It will comply with applicable laws.



Signature of Authorized Official

7/9/2024 Date

Executive Director SLCOB Title

Appendix B.VII Lobbying Certification for All Applicants

**LOBBYING CERTIFICATION FOR ALL APPLICANTS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



Signature of Authorized Official

7/9/2024 Date

Executive Director SLRCOG Title

## Attachment H Summary of Comments



To whom it may concern:

Santee-Lynches Regional Development Corporation held a 15-day public comment period from May 3, 2024, to May 18, 2024, to give the public an opportunity to review and make comments on the draft Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Notice of Funding (NOFO). There were no comments from the public.

Santee-Lynches Regional Development Corporation also held a public hearing on May 2, 2024, at 6:00 PM at the Santee-Lynches Regional Council of Governments' office at 3219 Broad Street, Sumter, SC, 29150. There were no comments made by the public at the hearing.

Sincerely,

A handwritten signature in blue ink that reads 'Shekia Harvin'.

Shekia Harvin