

Factor (a): Need

West Piedmont Planning District Commission

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

The project area that West Piedmont Planning District Commission (WPPDC) has designated for the use of PRICE funds are the Town of Rocky Mount, the City of Martinsville, the City of Danville, Patrick County, Henry County, Franklin County, and Pittsylvania County all located in the southwestern piedmont region of Virginia. “In the WPPDC region around 24% of households spend more than 30 percent of their income on housing. Of those households 21,300 have incomes of less than 80 percent of the Area Median Income. These households will often have to make choices between housing and other necessities like food, clothing, transportation, and medical care. Quite often they live with the fear of losing their housing and may experience homelessness. Renters are more likely to be affected by increasing housing costs than homeowners. Homeowners generally have a fixed mortgage payment; renters typically are subject to annual rent increases and more likely to experience housing cost-burden at a higher rate than homeowners. Homeowners can become cost burdened due to economic hardships such as job loss, maintenance costs, death of a family member or fixed incomes that do not keep up rising costs of taxes, utilities, and insurance.” “Manufactured home communities (MHCs) in Franklin County serve as a major source of market affordable housing. But their affordability often stems from aging housing units and stigma. For many families, these are the only options available and affordable to them. However, the quality of older manufactured homes continues to be a health and safety issue, while development pressures risk displacing families.”

The WPPDC region is made up of a vast amount of manufactured home communities (MHCs) and independent manufactured homes on privately owned lots. According to data from the Department of Motor Vehicles (DMV), as of June 2022, 5,271 mobile or manufactured homes are registered in Henry County, 130 mobile or manufactured homes are registered in Martinsville, 7,415 manufactured homes are registered in Pittsylvania County, 398 manufactured homes are registered in Danville, and 2,875 mobile or manufactured homes are registered in Patrick County. “The Franklin County 2023 Tax Parcels Record identified 4,707 mobile or manufactured units. County staff described many of these units as being located in older mobile and manufactured home communities.”ⁱ

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

Currently the WPPDC services an area that includes both communities that meet Distress Criteria and communities transitioning from Distress Criteria. The area median income for most of the localities falls below the national average. Two localities have an unemployment rate that is higher than the national average. Many families find themselves in homes that are below building code standards and paying rental rates that have doubled within the last 5 years. The area median income has not increased at the same rate as rental rates causing many families to face eviction.

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

West Piedmont Planning District Commission's service area does not include any areas identified as Community Disaster Resilience Zones.

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

Barriers to manufactured housing preservation and revitalization in the project area include land use controls, insufficient infrastructure, permitting procedures and fees, perceived poor quality and, lack of funding by property owners. Some ordinances restrict manufactured homeowners who wish to upgrade infrastructure and their home. If the homeowner can afford upgrades, they may be limited to the types of upgrades they can do and further burdened with the cost of permits and fees.

In the WPPDC service area, there are many low-moderate income households and multiple races including black/brown persons of color residing in manufactured home communities. "Black homeowners are more likely to consider purchasing a manufactured home compared to other racial groups (66%)."ⁱⁱ Typically, manufactured home communities are segregated by race/national origin/color. Persons of color tend to reside in manufactured home communities where other persons of color are the majority. People of color, specifically Blacks and African Americans historically have lower incomes than White or Caucasians." 1970 the median income for Black households was \$30,400, according to the Pew Research Center. That's compared with \$54,100 for white households — a difference of \$23,700, or 44%. 2022 the median income for Black households was \$52,860, according to the U.S. Census Bureau. That's compared with \$77,250 for white households — a difference of \$24,390, or 32%.ⁱⁱⁱ This creates its own barrier for education, health care services and homeownership. The community has a lack of resources and becomes a slum or blighted. Educational and health care barriers create a vicious cycle of generational poverty. The PRICE grant will allow for WPPDC to target low-moderate income MHCs and people of color to address deficiencies in infrastructure and homes owned by low-moderate households. This will increase wealth within the household and has the potential to change the perception of these neighborhoods. Localities will increase the want of more diversity and resources available within manufactured home communities.

Factor (b): Soundness of Approach
West Piedmont Planning District Commission

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

What are your vision and goals?

The goal of the West Piedmont Planning District Commission is to create more sustainable housing and revitalize affordable housing in underserved communities for low-moderate income families as well as people of color across the southwestern Piedmont region of Virginia. WPPDC also plans to prevent eviction by providing one-time payment of arrears for low-income renters and providing referrals to housing and legal counseling to all low-income residents of the benefited MHCs. By investing in the success of manufactured home communities across the region, WPPDC will promote community development that generates wealth-building for underserved communities. The rehabilitation of manufactured home communities also reduces exposure to health and environmental hazards and helps to eliminate substandard housing, especially for low-income households. Rehabilitation of manufactured units will create energy efficient homes promoting environmental justice as well as reducing financial burdens for heating, cooling, and utility services. Eviction prevention assistance will reduce social inequalities and homelessness.

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

WPPDC has worked with each of our localities to determine some of the manufactured home communities that need the most infrastructure repairs and based on local inspections departments, have some of the worst substandard conditions in the area. WPPDC's Data Systems Manager has created a list of manufactured home communities in the service area. Using this list and the list provided by localities, surveys have been mailed out to each community owner to help determine needs within the community and the demographics of the residents that they serve. WPPDC seeks to increase property value, sustainability, as well as standards of living by providing the following services:

- Infrastructure upgrades and repairs as needed including but not limited to:
 - Well systems upgrade and repair as needed, or water tap connections if available.
 - Water testing on private water systems for lead, bacteria and/or other contaminants.
 - Septic systems upgrade and repair as needed, or sewer connections if available.
 - Sidewalk, gutter and curb installation if permissible or repaired as needed.
 - Lighting and safety upgrade and repairs as needed.
 - The introduction of broadband access to communities if available.
 - Home/lot identification for the purposes of emergency services.
 - Paving unpaved, gravel, cracked, dirt, or dilapidated roads which serve as the main entrance/exit and within manufactured housing communities.

Infrastructure services to manufactured home communities will require that at least 51% of the households within the community be low income. A final screening, once approved, will be done for each community site capturing income, demographics as well as providing referrals to other health and community services around the region as needed.

- Rehabilitation of individual manufactured homes located within designated communities including owner occupied and those homes owned by the manufactured housing community. The type of repairs includes but are not limited to:
 - HVAC upgrades or repairs as needed.
 - Plumbing upgrades or repairs as needed including fixtures and water heaters.
 - Floor repairs or replacements as needed.
 - Roof and gutter repairs or replacements as needed.
 - Insulation repairs, replacements, or upgrades as needed.
 - Electrical repairs or upgrades as needed.
 - Window, siding, and door replacement or upgrades as needed.
 - Drywall, sheet rock, panel, and paint repairs and upgrades as needed.
 - Chassis, foundation, underpinning repairs, or upgrades as needed.
 - Lead Risk Assessments.
 - Manufactured home replacement for units built pre-1976.

Homeowner rehabilitation will be exclusively for low-income households. Investor-owned rehabilitation (properties owned by the community or private rental units) will be required to maintain affordable rental rates for a specific period of performance while also giving priority to low-income households when filling a vacancy. Lead risk assessments will be conducted on each home regardless of the year built. Homes built pre-1976 needing repairs and/or upgrades will be replaced with a compatible new manufactured home.

- Eviction prevention within the Manufactured Home Community include but are not limited to:
 - One-time payment of arrear rental fees for low-income households.
 - Informing residents of their rights.
 - Referrals to housing and/or legal counseling

What is your timeline and key tasks along that timeline?

West Piedmont Planning District Commission will work simultaneously with all localities to execute our plans. For a maximum of the first 6 months, WPPDC will screen MHCs across the region to determine eligibility as well as scope of work needed. Rental assistance will be provided immediately to landlords/MHC owners once a tenant is deemed approved. Referrals to housing and legal services will be provided upon request and as needed to low-income residents of the MHC. Communities with at least 51% low-income residents will be assisted with infrastructure and home rehabilitation repair and upgrades on a first come first served basis with priority given to those who are at highest risk of eviction and based on the application grading scale rank highest (worst living conditions). Because WPPDC services a large area of southwestern Virginia, we have requested all localities to provide the WPPDC with 3 potential residential contractors who may be interested in a project of this magnitude. All jobs will be placed out to bid not on an individual home basis but by the community, including infrastructure repairs and upgrades to ensure that jobs move in a timely manner. Paving is best done in the warmer summer months, so we intend to have all other infrastructure repairs and upgrades done first so as not to damage the paved roads with other heavy equipment and construction. We anticipate assisting at least two MHCs per locality totaling 12 (combining the Town of Rocky Mount and Franklin County) over the span of 5 years, ending in the year 2030.

What is your budget?

West Piedmont Planning District Commission is seeking a total of \$13,097,181.47 to successfully execute its plan with \$12,997,181.47 being federal share. WPPDC will employ its Housing Programs Director, Housing Programs Specialist, Housing Rehabilitation Specialist/Lead Risk Assessor and the Finance Director to administer the grant. Personnel, other direct costs, indirect costs, fringe, travel and supplies are budgeted at \$959,820.46.

WPPDC is seeking \$12,134,361 for construction costs, spending an average of \$40,000 per unit on rehabilitation. Each locality will be allocated \$1,000,000 each for rehabilitation allowing for at least 25 homes to benefit in each locality or at least 150 homes in the region. \$148,000 will be allocated for temporary relocation for residents occupying homes needing extensive rehabilitation or replacement.

Infrastructure repairs and upgrades will be done as needed upon inspection. MHCs will be guaranteed \$10,000 for infrastructure upgrades and repairs with no upfront match. Any Infrastructure repairs needed exceeding \$10,000 will require 50% match from the MHC owner. MHC owners who are not able to secure private funding for match, are able to borrow the required match amount from WPPDC. PRICE grant funds will be used to provide 2% interest loans to be paid over the 15-year period of performance for match requirements. Program income acquired from loans will be deposited into the WPPDC's developmental account used for future development of low-income housing.

WPPDC will offer Lead Risk Assessments to each home rehabilitated. Although labor cannot be used as match, WPPDC believes that it is important for each household to be certain that their home's lead levels are safe for generations to come.

Virginia Housing is providing match in the amount of \$100,000 for preliminary engineering work, impact studies including environmental, infrastructure and fiscal considerations, title searches and property surveys, as well as site planning.

Solutions That Empower People, Inc. or STEP-Inc will offer referrals to the program as well as serve as an application hub at its locations in the WPPDC region. STEP-Inc. "is a dynamic community action agency that provides services at significant milestones throughout life. Programs are designed to partner with individuals and families to help them overcome adversity and enhance their quality of life through community, economic, personal, and family development."^{iv} Some of the programs offered by STEP-Inc. include child development and school readiness programs through Head Start/Early Head Start; a private day school and college readiness program through Youth Services; weatherization, crisis heating and cooling, and home rental assistance services through Weatherization and Housing; home-delivered meals, congregate meals, and transportation services through Senior Services; homelessness prevention and community re-entry (for citizens returning to the community) services through Supportive Services; and tax preparation assistance through our Volunteer Income Tax Assistance (VITA) program. STEP-Inc. has agreed to a \$3,000 contract for its services to be spent over the grant cycle.

What are the projected impacts of your activities if implemented?

The West Piedmont Planning District Commission will be able to increase the quality of life for all residents living within the benefited MHCs with infrastructure upgrades. Low-income residents will benefit from rental assistance, counseling referrals, infrastructure, and residential rehabilitation. Residential and infrastructure repairs and upgrades will decrease slum and blighted communities across the region. Water and sewer repairs and upgrades have potential to eliminate water contamination, raw sewage spillage/overflow, and the unavailability of water due to dry wells, failing water pumps, or property owners financially not able to make needed repairs during times of emergency. Sidewalk, curb, and gutter repairs provide pedestrians safer spaces for travel. It can also increase the desire for residents to exercise including walking, jogging and cycling without worrying about sharing the roadway with vehicles. Gutter and sewer repairs can prevent flooding and damage to homes due to flooding. Lighting and other security upgrades provide a safer community and deters criminal activity. The introduction to broadband allows for children and adults to stay connected whether for education, work, and safety reasons. Home/lot identification allows for emergency services to locate properties quickly and accurately.

Home rehabilitation increases property value allowing for households to generate wealth. All upgrades, residential or infrastructure, help both the MHCs and homes located within the MHC s to compete with other low-income housing such as project-based housing, income based

housing, and subsidized housing. These upgrades also allow for MHCs to sustain natural disasters and rare extreme weather conditions such as high and low temperatures and all forms of precipitation. Lead Risk Assessments and abiding by HUD's lead-based paint rules ensure that residents, contractors, neighbors, and the environment are protected from the potential hazards that lead paint can hold if not properly removed and abated.

\$45,000 will be allocated towards one-time payment of rental arrears helps to eliminate homelessness and placing the burden on households of finding new housing with increased housing cost and lower stock. Evictions can hinder tenants from be pre-qualified for other housing options and create an additional cost to the tenant with legal and other fees associated with evictions. Displaced residents, especially children, have a higher risk of falling behind in school and developing health and mental illnesses. By providing referrals to housing and legal counseling, WPPDC will help to reduce injustices from landlords and provide education on rights. Housing counseling can also transition into future homeownership as well as financial education.

Subfactor (b)(ii): Affordability and Equity

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

Each homeowner receiving rehabilitation will be provided with a contract outlining the period of performance requirements. Contracts will explain that the home will not be sold or transferred for a minimum of 15 years. If the home is no longer owner occupied, it will be occupied by a low-income household regardless of if it is rented, gifted, or heired. Homeowners will be subjected to audits to verify income for residents and inspections to ensure assets are not under distress or dismay.

MHC owners will be obligated to a Deed of Trust as well as a contract. Within the contract, MHC owners are required to give homeowners within the community priority to purchase their individual lot, if the property is sold prior to the completion of the period of performance. Clauses will be included so that properties are to remain affordable until the completion of the period of performance regardless of property transfers. This will ensure affordability for renters to come and encourages residential owned MHCs in the event of a sale. The Deed of Trust will also outline recapture clauses. Each MHC will be subjected to audits from WPPDC, its local municipality or HUD to ensure that at least 51% of the community remains low income as well as rental rates are within HUD's standards.

What protections will be in place for residents?

WPPDC will contractually require MHCs to adhere to HUD's rental rate requirements and priority in the event of a sale it protects residents from price gouging and unaffordable rent

increases. It also ensures affordable housing for the subsequent 15 years. It also gives opportunities for low-income households to be land/real property owners and add value to their current home. By requiring MHC owners to adhere to HUD's rental rate requirements, WPPDC aligns with The White House Blueprint for a Renters Bill of Rights. "Increases in rents should be reasonable, with the acknowledgement that rents may need to increase to cover operating costs. These increases should be transparent and fair to protect against gouging."^v

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

Rehabilitation of homes will assist in making them accessible for the occupant by request only. Some features include but are not limited to ramps, grab bars, toilets, faucets and widening doorways. Various infrastructure upgrades and repairs will provide sidewalks allowing for safer ADA pedestrian traffic in the MHC. This will support independent living for seniors and those with mobility disabilities. Referrals to housing and legal counseling eliminates financial burdens to households needing the services. Housing counseling can lead to other financial assistance like down payment assistance, independent development accounts or further rental assistance as needed. Because WPPDC will be providing supportive services, conducting rehabilitation and referrals to counseling, Lead Safe Housing Rule and HUD's lead-based paint rules.

WPPDC has confirmed that at least one Class A contractor who will be actively bidding on rehabilitation of the homes is a Section 3 contractor. The contractor has successfully executed various projects in the WPPDC region for local municipalities as well as WPPDC. Referrals to other programs, training, education, and counseling for low-income individuals and households will be provided by WPPDC as well as STEP-Inc.

What significant hazards could impact your project sites?

All regions in the West Piedmont Planning District Commission area fall within the very low or relatively low risk index. Hazards of concern across the region include riverine flooding, land slides and winter weather. Flood plain maps will be reviewed for each approved MHC to help determine which infrastructure upgrades and repairs best suit the community (paving, curb, gutter, water, and sewage systems).

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

Properly identifying and providing infrastructure upgrades and repairs can eliminate loss of property or life due to flooding and landslides. Providing communities with curb, gutter and paved roads allows for rainwater to no longer move freely across the community but be guided safely away from homes so that it prevents damages. Foundation and underpinning upgrades and repairs to homes can prevent the shift or movement of homes due to flooding and landslides. Other home repairs and upgrades like roofs, windows, doors, insulation, and HVAC create a more durable and stable home in winter weather like low temperatures, snow and ice.

Contractors will have specific instruction to use products and methods that make each home as energy efficient as possible, which reduces utility costs and future repair costs in the immediate future. Homes that have been subjected to repetitive loss due to flooding will be moved within the MHC if applicable or upgrades will be done to prevent future loss like foundation and underpinning repairs.

Providing multiple types of referrals to various programs and education across the WPPDC region can include emergency preparedness and simple home repairs. Some infrastructure repairs remove burdens from MHC owners and residents due to weather and disasters. Water taps to local municipalities can eliminate water system failures due to extremely low temperatures. Paving can allow for easier access of the MHC for emergency vehicles as well as public works vehicles for things like snow removal. All of which will improve the quality of life for LMI residents and remove barriers and reduce costs.

How does your proposal help advance Environmental Justice?

The West Piedmont Planning District Commission will reduce exposure to environmental and health hazards by providing lead risk assessments as well as water testing on private water systems and providing upgrades to them as necessary. Rehabilitation activities like roof replacement and repairs, foundation and underpinning repairs and various infrastructure upgrades like paving, curb and gutter repairs and upgrades will improve protection from and resilience to environmental harms. By floodproofing and using fire-resistant materials and energy efficient products, homes become more resilient to environmental harms. Adding sidewalks when available expands environmental benefits and adding various infrastructure like curb, gutter, sewage, and water systems assists the MHC in overcoming prior disinvestment in environmental infrastructure.

Subfactor (b)(iv): Community Engagement

How will you seek and encourage diverse stakeholder participation?

West Piedmont Planning District Commission has received letters of support from MHC owners across the region, each local government that WPPDC services, Virginia Housing, STEP, Inc., Virginia Poverty Law Center, Housing Forward of Virginia and Danville Redevelopment and Housing Authority. Each stakeholder provides a service to low-income residents across the state of Virginia. We will receive referrals for assistance from each stakeholder and provide referrals to our stakeholders for programs like housing and legal counseling. WPPDC will use diverse advertising efforts and multiple community meetings to get feedback and participation from black and brown communities and collaborate with our stakeholders to gain trust of multiple ethnic groups and communities. It is anticipated the communities with large immigrant populations will be resistant to accept assistance.

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

The West Piedmont Planning District Commission’s proposal aligns with the most recent housing study published for the region on how to mitigate the housing shortage. The housing study suggests that the region “coordinate home repair and rehabilitation programs at the regional level to maximize reach and impact. This strategy involves partnering with local and regional offices, banks, and service providers to create accessible pathways for property owners to tap into home improvement resources, such as those offered by DHCD, SERCAP, and USDA Rural Development. By strategically aligning program waitlists and eligible uses for funds, resources can be distributed more efficiently and effectively.” Specifically for MHC in Franklin County “revitalization efforts can improve housing quality, maintain affordability, and prevent displacement. When collaborating with local governments, these nonprofits can be ready to step in when private owners are ready (or pressured) to sell their communities.” Patrick and Pittsylvania County has been recommended to “improve housing conditions—especially in manufactured home parks—with new initiatives.” Patrick County has also be suggested to “leverage the planned expansion of water and sewer infrastructure to encourage a greater range of housing options within the service area.” Lastly, Pittsylvania County is encouraged to “pair the zoning ordinance update with new material and resources to educate developers, property owners, and public about changes.”^{vi}

Factor (c): Capacity

West Piedmont Planning District Commission

What experience do you have managing projects?

Established in 1970 by the state legislation, the West Piedmont Planning District Commission has served Franklin, Patrick, Henry, and Pittsylvania counties and the cities of Danville and Martinsville for over 40 years. A major function of the PDC is to facilitate regional approaches to activities such as economic development, transportation, housing, and the support of legislative priorities. The WPPDC fully supports organizations and programs that serve to eradicate barriers to affordable housing in our region. Since its inception, one of the primary roles of our organization has been the administration of grants for our member local governments which are often understaffed. Grants are also a primary source of funding for the PDC.

Currently, WPPDC administers projects with funding through the Virginia Department of Housing and Community Development. These grants are administered by the WPPDC for local member governments:

- Martinsville
 - CDBG Planning – Fayette Street Corridor Improvement Plan
 - One Ellsworth, Mixed Use in Uptown District of Martinsville
 - Enterprise Zone 54B City of Martinsville
 - Enterprise Zone 36B Martinsville
 - CDBG Pine Hall Housing Rehab Project.
- Stuart
 - CDBG Construction – Downtown Revitalization
- Rocky Mount
 - CDBG Planning – North Main Street Corridor Improvement Plan
- Regionwide WPPDC
 - Virginia Housing PDC Housing Development Grant
 - Housing Initiative grants from Danville Regional Foundation and Harvest Foundation

Members of the WPPDC staff have experience in federal and state grants and programs for local governments in previous roles:

- Successfully applied for State and Federal grants including:
 - Department of Housing and Community Development: Virginia Eviction Reduction Pilot (Planning Grant)
 - Lead Hazard Control and Healthy Homes
- Monitoring of subrecipient and CHDO activities
- Written and implemented action plans for:
 - City of Danville, Virginia's CDBG and HOME entitlement funds
 - City of Danville, Virginia's CDBG-CV funds
 - City of Danville, Virginia's HOME—ARP funds

- Complied a CAPER for the City of Danville

What is your experience using grant funds?

Currently, WPPDC is administering a housing rehabilitation program for the City of Martinsville using CDBG funds. “The City of Martinsville received a Housing Rehabilitation Grant from the Virginia Department of Housing and Community Development (VDHCD). The purpose of the grant is to provide substantial reconstruction and rehabilitation of homes within the Pine Hall neighborhood of the City of Martinsville. The project area includes the Pine Hall Neighborhood Streets: Pine Hall, North Avenue, Wray Street, West Fayette Street and Top Street. The total project cost is \$1,679,735; DHCD’s portion is \$1,183,310 in CDBG funds; private and local leverage equals \$496,425. The Martinsville Pine Hall Housing Rehabilitation Project is a two-year project of which the City entered into an Agreement with DHCD in December 2021. All contracted products and activities shall be completed on or before November 2023. Applicants must not exceed HUD’s Low-to-Moderate Income (LMI) levels.”^{vii} With the assistance of WPPDC, Martinsville has been able to extend the grant cycle and complete rehabilitation on owner and tenant occupied dwellings. Initially, there was a struggle to secure contractors and qualified residents. WPPDC was able to use its community relations to gain the trust of residents and its vast relationship with local contractors to secure more contractors.

Members of the WPPDC staff have also executed programs using CDBG and HOME funds for local governments including:

- Homeowner Rehabilitation
- Acquire, Renovate, Sale
- Downpayment Assistance
- Rental Assistance
- Fair Housing education, outreach, and assistance with claims

Who are your key staff?

Housing Programs Director- Sean Campbell: Provides project leadership, guidance, and supervision to ensure that all HUD guidelines, timelines, and funding requirements are met. Acts as an secondary role for all other staff.

Housing Programs Specialist – Chasta White: Executes day to day operations of indirect activities and clerical direct activities including contracts, invoices, applications, and referrals.

Housing Rehabilitation Specialist/ Lead Risk Assessor – Michael Mercado: Executes Lead Risk Assessments, manages/supervises contractors, provides scope of work for all construction sites.

Finance Director – Jacob Bullins: Ensures that the project remains within the budget, requests any reimbursements, manages the financial reporting system.

STEP, Inc. will act as a hub for information, referrals, and applications. The agency will assist in clerical work and accept and provide referrals based on need to residents.

Vacancies will be advertised for immediate filling, The Housing Programs Director will as a secondary to all positions and temporarily take on additional roles in the event of a vacancy. In the event of a vacancy for the Housing Programs Director, the WPPDC Executive Director will temporarily assume the position.

What is your experience promoting racial equity?

WPPDC takes measures with every housing project to educate residents about State and Federal Fair Housing laws. Referrals are provided for legal counseling in the event of discrimination. Members of the WPPDC staff are active members of the NAACP, a former VP of a NAACP local branch, former Fair Housing Agent for the City of Danville and hold a Fair Housing Certificate with the Department of Professional and Occupational Regulation.

What is your experience completing environmental reviews?

WPPDC has prepared environmental reviews for various projects and has staff that has prepared environmental reviews including tiered views and site-specific reviews.

Are you familiar with cross-cutting federal requirements?

WPPDC and its staff is familiar with cross-cutting federal requirements like Davis-Bacon labor standards, Lead Safe regulations, 2 CFR part 200, and fair housing requirements. Various staff have received training in these requirements and gained experience through other projects. A current staff member held the position of Fair Housing Agent for the City of Danville who ensured that all programs and activities complied with fair housing requirements. This staff member also enforced Davis-Bacon regulations for all federal projects for the City of Danville.

Factor (d): Match or Leverage

West Piedmont Planning District Commission

West Piedmont Planning District Commission has secured additional grant funding in the amount of \$100,000 from Virginia Housing. “Virginia Housing is a self-supporting, not-for-profit organization created by the Commonwealth of Virginia in 1972 to help Virginians attain quality, affordable housing.” “Virginia Housing works with lenders, developers, local governments, community service organizations and others to help put quality housing within the reach of every Virginian.”^{viii}

Virginia Housing will be providing funds for the completion of preliminary engineering work, impact studies including environmental, infrastructure and fiscal considerations, title searches and property surveys, as well as site planning.

If awarded less than the requested proposal, WPPDC will adjust the budget to still anticipate for the rehabilitation of 150 homes but limit the amount of infrastructure repairs done to only address critical repairs and upgrades needed for the health and safety of all residents of the MHC.

Factor (e): Long-Term Effect
West Piedmont Planning District Commission

WPPDC will include certain protective measures in the contract, Deed of Trust as well as the Note to ensure that properties remain affordable over the next 15 years.

Homeowners:

Each homeowner receiving rehabilitation will be provided with a contract outlining the 15-year period of performance requirements. Contracts will explain that the home will not be sold or transferred for a minimum of 15 years. If the home is no longer owner occupied due to death or health related issues with the owner/owners, it will be occupied by a low-income household. This includes homes that become rentals, gifted, or heired to another family member. Homeowners, if occupying the home, or tenants will be subjected to audits to verify income. Residencies are subjected to inspections to ensure assets are not under distress or dismay.

Manufactured Home Communities and Landlords:

MHC owners will be obligated to a Deed of Trust as well as a contract. Contracts will state MHC is required to give homeowners (those renting lots only) within the community priority to purchase their individual lot and tenants (renting both a home and lot) priority to both the home and the lot, if the community is sold prior to the completion of the period of performance. Each rental unit owned by the MHC or privately owned receiving rehabilitation must remain affordable until the completion of the period of performance. If the home or MHC transfers ownership, a clause must be in place for the property to remain affordable. The Deed of Trust will also outline recapture clauses. Each MHC will be subjected to audits from WPPDC, its local municipality or HUD to ensure that at least 51% of the community remains low income as well as rental rates are within HUD's standards.

These measures protect renters for the next 15 years from rent increases that don't align with HUD's requirements. Allowing renters to have priority to purchase their home and/or lot increases homeownership in black and brown communities and LMI communities. Being subjected to property inspections protects the MHC and homeowners from destructive tenants and allows preventive measures to take place to maintain sustainability in the MHC.

Rental assistance, housing and legal counseling can increase sustainability in households. Preventing eviction provides stability for adults as well as children. It allows people to focus on other priorities like school, work, and health without worries of homelessness. Housing counseling can also lead to homeownership by achieving improved credit, downpayment assistance, completing home repair classes and emergency preparedness programs.

MHC's receiving assistance will remove the negative stereotypes of the quality of living offered within the community, encouraging the further development of MHCs and affordable housing across the region.

ⁱ 2024 West Piedmont Planning District Commission Housing Study
[WPPDC Regional Housing Study Consumer.pdf](#)

ⁱⁱ Housing Forward Virginia
<https://housingforwardva.org/news/fwd-173-manufactured-housing-millennials-homeownership/>

ⁱⁱⁱ Lending Tree
<https://www.lendingtree.com/debt-consolidation/black-and-white-disparities-study/#:~:text=2022%3A%20The%20median%20income%20for,of%20%2424%2C390%2C%20or%2032%25>

^{iv} STEP-Inc.
<https://www.stepincva.com/about-step>

^v The White House Blueprint for a Renters Bill of Rights
<https://www.whitehouse.gov/wp-content/uploads/2023/01/White-House-Blueprint-for-a-Renters-Bill-of-Rights.pdf>

^{vi} 2024 West Piedmont Planning District Commission Housing Study
[WPPDC Regional Housing Study Consumer.pdf](#)

^{vii} City of Martinsville, VA Pine Hall Project
<https://www.martinsville-va.gov/AgendaCenter/ViewFile/Agenda/02242022-128>

^{viii} Virginia Housing
<https://www.virginia.gov/agencies/virginia-housing-development-authority/#:~:text=Virginia%20Housing%20is%20a%20self,developers%20of%20quality%20rental%20housing.>