# FAIRFAX COUNTY DRAFT APPLICATION

### FOR THE

# U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY ENHANCEMENT (PRICE) MAIN COMPETITION

#### May 6, 2024 Amended June 6, 2024, to add Attachments D and E

## Table of Contents

Exhibit A Executive Summary

Exhibit B Threshold Requirements and Other Submission Requirements.

Exhibit C Need

Exhibit D Soundness of Approach

- i. Subfactor (b)(i): Project Description, Management, and Impact
- ii. Subfactor (b)(ii): Affordability and Equity
- iii. Subfactor (b)(iii): Environment and Resilience
- iv. Subfactor (b)(iv): Community Engagement

Exhibit E: Capacity

Exhibit F: Match or Leverage

Exhibit G: Long Term Effect

**Required Attachments** 

- Attachment A. Advancing Racial Equity
- Attachment B. Affirmative Marketing
- Attachment C. Affirmatively Furthering Fair Housing
- Attachment D. Eligible Applicants documentation
- Attachment E. Evidence of Partnership letters
- Attachment F. Match or leverage documentation
- Attachment G. Application Certifications and Standard forms
- Attachment H. Summary of Public Comments on published Application

### **Exhibit A: EXECUTIVE SUMMARY**

Fairfax County, Virginia, renowned for its quality of life and economic opportunities, faces a pressing need for affordable and accessible housing. Despite its high median income, a significant portion of Fairfax County residents struggle with the soaring cost of living, racial disparities, and limited affordable housing options. Particularly vulnerable are low-and moderate-income (LMI) households, especially those earning below 30 percent of the Area Median Income (AMI), who face severe housing burdens and a lack of equitable opportunities.

With approximately one in five renters in Fairfax County facing severe housing cost burdens, the demand for affordable housing is urgent and projected to escalate. By 2034, the county anticipates a need for over 18,000 new housing units for households earning less than 80 percent of the AMI. This challenge not only threatens the economic vitality of Fairfax County but also impedes the realization of its commitment to racial and social equity through initiatives like the One Fairfax policy.

Manufactured Housing Communities (MHCs) in Fairfax County serve as crucial sources of affordable housing, particularly for working families. However, these communities face multifaceted challenges, including escalating land values, regulatory constraints, and vulnerability to environmental hazards such as flooding, storms, and extreme heat. Residents of MHCs are disproportionately impacted by these challenges due to limited economic capacity, physical location in environmentally hazardous areas, and linguistic isolation.

Recognizing the critical role of MHCs in providing affordable housing, Fairfax County has undertaken significant efforts to preserve and revitalize these communities. The Manufactured Housing Task Force (MHTF) was established to develop strategies for preserving affordable housing opportunities within MHCs. However, barriers such as high land costs, limited constitutional authority, and limited resident organization hinder preservation efforts.

Fairfax County's application for the PRICE Main Competition seeks to address these challenges comprehensively by promoting housing preservation and revitalization, accelerating services to MHCs, and implementing the recommendations of the MHTF through a lens of racial and social equity. By enhancing resilience to natural hazards, improving resident organization and economic capacity, and mitigating regulatory constraints, Fairfax County aims to safeguard the affordability and accessibility of housing within MHCs.

The proposed interventions not only address immediate housing needs but also align with Fairfax County's broader goals of promoting equitable access to housing and fostering resilient communities. Through collaborative efforts between government agencies, residents, MHC owners, and community organizations, Fairfax County endeavors to ensure that all residents have access to safe, affordable, and dignified housing, thereby fostering a more inclusive and prosperous community for all.

## EXHIBIT B: THRESHOLD REQUIREMENTS AND OTHER SUBMISSION REQUIREMENTS

The Department of Housing and Community Development (HCD) operates under the Fairfax County Government in Fairfax County, VA. HCD is an eligible applicant for the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition as a local county government. All eligibility requirements under Exhibit B Threshold Requirements in Section III.D and Other Submission Requirements in Section IV.G are met, with no unresolved Civil Rights Matters, to be eligible for the PRICE grant.

Applicant: Fairfax County Government, Department of Housing and Community Development.

Type of Applicant: Local Government.

Main Point of Contact: Meghan Van Dam, Affordable Housing Division Director, HCD.

Address: 3700 Pender Drive, Fairfax, VA 22030.

Contact Information: Meghan.VanDam@fairfaxcounty.gov; (703)324-1379.

Outstanding Civil Rights Matters: None.

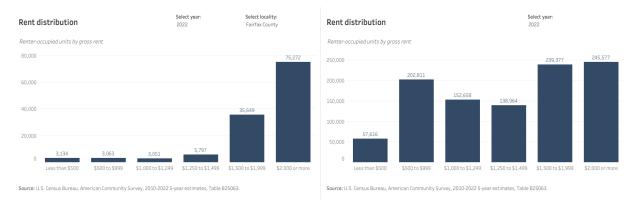
### **EXHIBIT C: NEED (Maximum 15 points)**

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

Fairfax County, Virginia is a great place to live and to do business. Approximately 1.14 million people call Fairfax County home, meaning about one in every eight Virginians live in the Fairfax County. The county has one of the highest Area Median Incomes (AMI) in the nation, currently \$154,700 for a family of four as determined by the US Department of Housing and Urban Development (HUD); however, not all residents are prospering in the county. The high cost of living, racial and income inequities, and the lack of affordable housing options is putting the County's well-being and future prosperity at risk. A household with two working adults and two children needs an annual gross income of about \$150,183 as a living wage to meet basic living expenses.<sup>1</sup> This income is about five times higher than the federal poverty level.

Low-income households in Fairfax County, particularly those below 30 percent of AMI (i.e., extremely low-income households) are the most disadvantaged in finding and keeping housing in the current market. Extremely low-income households in Fairfax County have a high incidence of housing problems and are more often severely cost burdened than other populations. Furthermore, a disproportionately high number of minority non-white households pay more than 30 percent of their household income for housing. This disproportionality is greatest among Black/African Americans and Hispanics. Hispanic households experience cost burden most frequently, and approximately 44 percent of Hispanic households are cost burdened, paying more than 30 percent of their income as rent.<sup>2</sup>

Fairfax County's rent prices are substantially higher than the state average and are notably less equitably distributed across price ranges (Figure 1).



#### Figure 1: Rent Distribution in Fairfax County (left) versus Virginia (right)

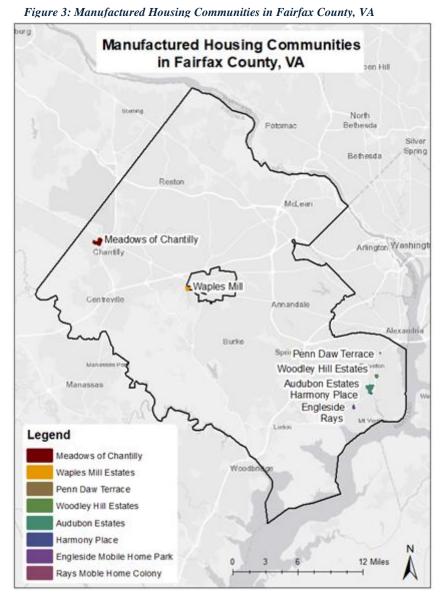
<sup>&</sup>lt;sup>1</sup> Living Wage Calculator for Fairfax County, VA. Dr. Amy K. Glasmeier and the Massachusetts Institute of Technology. 2024. https://livingwage.mit.edu/counties/51059

<sup>&</sup>lt;sup>2</sup> Fairfax County Five-Year Consolidated Plan for FY2022 – FY2026. Fairfax County, Va., page 8.

https://www.fairfaxcounty.gov/housing/sites/housing/files/Assets/documents/Consolidated%20Plan/5-

Year%20Consolidated%20Plan%20-%20FY2022-2026.pdf

One in five renters in the county are "severely cost burdened," meaning they pay more than 50 percent of their income for housing and often make difficult choices among necessities. By 2034, over 18,000 new housing units will be needed for households earning less than 80 percent of the AMI. At the same time, wage growth is not keeping pace with the cost of and demand for housing and families, particularly those that would be considered low- or moderate-income (LMI), who are falling further behind. The economic viability of Fairfax County is at stake, as evidenced by Fairfax County's 2015 Strategic Plan to Facilitate the Economic Success of Fairfax County.<sup>3</sup> Furthermore, the lack of a range of affordable, accessible housing in the county hinders the full implementation of the county's One Fairfax policy racial and social equity



policy, which calls for equitable access to communities of high opportunity.

Fairfax County affirms Manufactured Housing Communities (MHCs) as an important source of affordable housing in the county. The county has eight existing MHCs, containing approximately 1,750 units.<sup>4</sup> Six of the county's eight MHCs (Penn Daw Terrace, Woodley Hill Estates, Audubon Estates, Harmony Place, Engleside Mobile Home Park, and Rays Mobile Home Colony) are along the historic Richmond Highway (U.S. Route 1) corridor. The other two, Meadows of Chantilly and Waples Mill Estates, are further west, in Chantilly and just outside of Fairfax City, respectively.

The Richmond Highway corridor is an area of disproportionate socioeconomic vulnerability in the county. Portions of

<sup>&</sup>lt;sup>3</sup> The Fairfax County Board of Supervisors' Strategic Plan to Facilitate the Economic Success of Fairfax County. Fairfax County, Va. 2015. https://www.fairfaxcounty.gov/economic-success/sites/economic-success/files/Assets/Documents/PDF/strategic-plan-facilitate-economic-success-2015.pdf

<sup>&</sup>lt;sup>4</sup> Fairfax County Manufactured Housing Task Force – Recommendations Document. August 2022. <u>Manufactured Housing Task</u> Force | Topics (fairfaxcounty.gov)

Richmond Highway, including the Census Tracts where several of the MHCs are located, experience "Very High" levels of Vulnerability with high percentages of persons with low educational attainment, low English-speaking ability, and low-income occupations, as measured in the county's Vulnerability Index.<sup>5</sup>

Further, the county is planning a new bus rapid transit (BRT) system along the Richmond Highway Corridor. The expected new development stemming from the BRT system on Richmond Highway and in Fairfax County generally will continue to increase redevelopment pressure on the value of the county's MHCs and the residents who call them home. Additionally, the associated highway and infrastructure expansion is planned to displace manufactured housing units. The most recent sale of two adjacent MHCs – Rays and Engleside, which include 120 manufactured homes – demonstrates both the high land value and the resulting vulnerability of the affordability facing these communities, with pad sites traded at \$200,000 each, or \$24 million in total.

The MHCs across the county have different characteristics, zoning and tax classifications, and widely varying physical conditions. Five of the eight MHCs are non-conforming for zoning, as the MHCs are located on sites zoned and may develop as a matter-of-right for commercial and industrial uses, as has happened to other, former MHCs in the past. Three are planned for redevelopment into higher density development. Vulnerability to flooding and climate-related challenges, antiquated sewer, water, and electrical systems, and poor road, pedestrian and recreation facilities are common among the parks. In addition, many parks have large numbers of units in substandard conditions and need to be replaced, including nearly 300 homes that were manufactured in 1976 or earlier. Finally, most residents of the MHCs in Fairfax County have low incomes and are unable to compete for other housing options.

While people choose to live in MHCs for a wide variety of reasons, Fairfax County's MHCs primarily serve as critical sources of affordable housing, largely for working families. However, these residents face many challenges and pressures including but not limited to the cost of land, the fear of displacement, the substandard condition of their homes, associated health and safety issues, and access to credit and traditional homeownership options. With the high cost of land, there are also redevelopment and gentrification pressures in several of the parks, as well as flooding issues, especially for two of the parks, Harmony Place and Audubon Estates. Residents also face nonconformity issues of their homes with current ordinances and regulations such as the Zoning Ordinance and floodplain regulations, due to changes in those ordinances over time.

Understanding and responding to the diverse challenges, needs, goals, and aspirations of residents is imperative to preserve the affordable housing opportunities that exist in MHCs. The challenges faced by the families living in MHCs require a new approach grounded in the principles of racial and social equity and characterized by encouraging residents to have more control over their housing and their economic future. To that end, Fairfax County has invested an unprecedented level of effort into understanding and responding to the needs of the MHCs. In 2021, the Fairfax County Board of Supervisors convened its Affordable Housing Preservation Task Force, which identified manufactured housing as an essential source of housing affordability in our community. At the recommendation of the preservation task force, the Board

<sup>&</sup>lt;sup>5</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

then convened a Manufactured Housing Task Force (MHTF), inclusive of representatives of the ownership and residents of the county's MHCs, to develop a plan to preserve the communities.

The work of the Fairfax County MHTF appears throughout this application and serves as the underpinning of the county's approach to preserving the affordable housing opportunities that exist in these eight unique communities. The PRICE grant would accelerate services to these communities, furthering affordable housing preservation goals in Fairfax County, and implementing the recommendations of the county's MHTF through the lens of racial and social equity.

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

Residents of the Manufactured Housing Communities (MHCs) in Fairfax County generally have lower incomes and higher poverty rates than other county residents. Data as defined by these distress criteria are presented at the larger scale (Census Block Group or Census Tract), which may dilute the conditions of the MHCs, especially in Fairfax County, which has a notably high cost of living and associated higher incomes overall. At the Census Block Group level, the communities meet the following distress criteria as defined in 12 CFR 1805.201 (b)(3)(ii)(D):

MHC Name	Percent	Median	Un-	Low Income
Address	Population	Family	employ-	composition
Census Tract & Group	living in	Income	ment	compared to
	poverty	(<\$123,760)	Rate	US
	$(20\%+)^6$	7	$(>5.7\%)^8$	population <sup>9</sup>
Audubon Estates, 7930 Audubon	(14.5%)	Distressed	(4.8%)	Distressed
Ave, Alexandria, VA 22306		(\$54,295)		73 <sup>rd</sup> percentile
Harmony Place 8018 Richmond	(14.5%)	Distressed	(4.8%)	Distressed
Highway, Alexandria, VA 22306		(\$54,295)		73 <sup>rd</sup> percentile
Engleside Mobile Home Park, 8500	(11.4%)	Distressed	(1.6%)	Distressed
Greenleaf Street, Alexandria, VA		(\$70,625)		75 <sup>th</sup> percentile
22309				
Rays Mobile Home Colony, 106	(11.4%)	Distressed	(1.6%)	Distressed
Denfield Dr, Alexandria, VA 22309		(\$70,625)		75 <sup>th</sup> percentile
Penn Daw Terrace, 6240 Shields	(4.1%)	Distressed	(3.1%)	34 <sup>th</sup> percentile
Ave, Alexandria, VA 22303		(\$111,500)		
Woodley Hill Estates, 2800-3008	(18.6%)	Distressed	(3.8%)	45 <sup>th</sup> percentile
Camellia Dr Alexandria, VA 22306		(\$103,017)		
Waples Mill Estates, 4308 Mobile	(4.6%)	(\$128,885)	(3.6%)	28 <sup>th</sup> percentile
Ct Fairfax, VA 22030				

Table 1: Distress Criteria

<sup>&</sup>lt;sup>6</sup> <u>Criteria</u>: Percent of population living in poverty is at least 20%.

<sup>&</sup>lt;sup>7</sup> <u>Criteria</u>: Within a Metropolitan Area, the median family income shall be at or below 80% of the Metropolitan Area median family income or national Metropolitan area family income, whichever is greater. Median HH income for the Washington-Alexandria MSA as of 2024 HUD Income is \$154,700. 80% of that is \$123,760.

<sup>&</sup>lt;sup>8</sup> <u>Criteria</u>: Areas with an unemployment rate at least 1.5 times the national unemployment rate. The National Unemployment Rate is 3.8% as of March 2024. 1.5 times that rate is 5.7%.

<sup>&</sup>lt;sup>9</sup> Percentiles are based on comparison to the United States population. (Higher # = higher vulnerability). Based on <u>US EPA EJ</u> <u>Screen.</u>

MHC Name	Percent	Median	Un-	Low Income
Address	Population	Family	employ-	composition
Census Tract & Group	living in	Income	ment	compared to
-	poverty	(<\$123,760)	Rate	US
	$(20\%+)^6$	7	$(>5.7\%)^8$	population <sup>9</sup>
Meadows of Chantilly, 4200 Airline	(7.4%)	Distressed	Data	Distressed
Parkway, Chantilly, VA 20151		(\$60,329)	unavailab	92 <sup>nd</sup>
			le	percentile

Recently, a survey of the Harmony Place MHC was completed to better understand the living conditions and experiences of the residents. The survey provides a more refined understanding than the Census Tract. Harmony Place MHC is home to 84 households. Many Harmony Place residents have lived in the community for 10 years or more, and all are concerned about displacement due to the widening of Richmond Highway to accommodate the BRT. Recently, residents' concerns were heightened due to news of the recent sale of the park. In addition to fear of displacement, residents are negatively affected by environmental and infrastructure issues. Two-thirds of the site is located in a flood plain, and years of deferred maintenance by the former park owner have contributed to deteriorating conditions within the park. A total of 62% of the resident households reported that they were "cost burdened," paying more than 30% of their income for their pad rents.

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

As detailed thoroughly in Exhibit D: Soundness of Approach, Subfactor (b)(iii): Environment and Resilience, two of the oldest MHCs in Fairfax County, Harmony Place and Audubon Estates, are directly within Federal Emergency Management Agency (FEMA) 100-year and 500year floodplains and are severely flood-prone, although they are not designated as FEMA "Community Disaster Resilience Zones." Swift water rescues, evacuations, and hospitalizations of residents of these communities have occurred during severe flooding events. Fairfax County is increasingly vulnerable to hazards such as flooding, severe storms, and heat. These hazards are being measurably exacerbated by both climate change and urbanization. Fairfax County's MHCs are disproportionately vulnerable to these hazards due to physical location, reliance on lowerquality infrastructure, lower financial capacity, lower rates of health insurance, higher dependence on electrical medical devices, and lower English proficiency, which can limit access to warnings and guidance, and disproportionate employment in outdoor professions exposed to the elements, among other factors. Detailed data on climate vulnerabilities and projections in Fairfax County can be found in the Climate Vulnerability and Risk Assessment, Resilient Fairfax Interactive Map Viewer, Resilience Dashboard, and Climate Projections Report. A table summarizing climate vulnerabilities for the eight MHCs can be found below. The map views are from the Resilient Fairfax Interactive Map Viewer.

#### Table 2: Summary of Mappable Hazard Vulnerabilities

Name Address	Flood Maps	Flood- Prone?	Heat Map	Avg. Land Temp <sup>10</sup>	Medically reliant on power <sup>11</sup>
Audubon Estates 7930 Audubon Ave Alexandria, VA 22306	Catter S	FEMA floodplain	1 2	99.2	136 people (in zip code)
Harmony Place Mobile Home Park 8018 Richmond Hwy. Alexandria, VA 22306		FEMA floodplain	La canalita da la canalit	98.2	136 people (in zip code)
Engleside Mobile Home Park 8500 Greenleaf Street, Alexandria, VA 22309		Urban flooding risk		100.4	107 people (in zip code)
Rays Mobile Home Colony 106 Denfield Dr Alexandria, VA 22309		Urban flooding risk		105.6	107 people (in zip code)
Penn Daw Terrace 6240 Shields Ave Alexandria, VA 22303		Urban flooding risk		99.9	43 people (in zip code)
Woodley Hill Estates 2800-3008 Camellia Dr Alexandria, VA 22306		Urban flooding risk		101.9	136 people (in zip code)
Waples Mill Estates 4308 Mobile Ct Fairfax, VA 22030		Urban flooding risk		102.8	215 people (in zip code)
Meadows of Chantilly 4200 Airline Parkway, Chantilly, VA 20151	Sie H	FEMA floodplain; sumps		104.0	83 people (in zip code)

This proposal would increase resilience in disaster-prone areas through a menu of options that can include: enhanced access to flooding-related services, emergency guidance, elevation of critical equipment, flood sensor and alert systems, improving and/or relocating flood-prone structures, coordinating with utilities for power resilience, replacing pre-1976 structures with modern wind-resilient structures, cool pavements and/or resilient shade tree plantings, and planning for larger capital improvements such as stormwater infrastructure upgrades, among other options. Additional details on resilience components of this proposal, including

<sup>&</sup>lt;sup>10</sup> Average land surface temperatures during summers 2013-2020 via satellite. <u>Resilient Fairfax Map Viewer</u>.

<sup>&</sup>lt;sup>11</sup> Data on the number of Medicare beneficiaries who are medically reliant on electrical equipment (for whom power outages can be life-threatening) are available by zip code from the HHS here: <u>https://empowerprogram.hhs.gov/empowermap</u>

descriptions of each hazard and how this proposal seeks to address these vulnerabilities can be found in *Exhibit D: Soundness of Approach: Subfactor (b) (iii): Environment and Resilience*.

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

A wide variety of barriers impede the successful preservation or revitalization of MHCs in Fairfax County:

Land values: Fairfax County, located just outside Washington, DC, has one of the highest costs of living in the nation. The high cost and low availability of land, slow pace of new housing development, and high demand puts our market out of reach for most low- and moderate-income (LMI) working families. The manufactured housing parks in the county serve as a crucial source of affordable, accessible housing for such families. However, the most recent sale of a manufactured housing community traded at \$200,000 per pad site – a total of approximately \$24 million. This is well out of reach for residents wishing to purchase and preserve their communities as affordable housing. These land prices are also beyond the means of Fairfax County's robust affordable housing development industry to finance and compete with for-profit market developers positioning themselves for eventual redevelopment of the properties.

**Constitutional authority:** Virginia is a *Dillon Rule* state, meaning the local governments have only that authority which is specifically delegated to them by the General Assembly. In the case of MHCs, the enabling authority provides very limited opportunities for residents, localities, and affordable housing developers to intervene in a sale. MHC owners are only required to provide residents with 60-day notice when they accept an offer to purchase their property. Residents may submit a competing offer within the 60-day notice. State law only requires owners to "consider" such counteroffers, and there is no right of first refusal for localities or residents. Fairfax County has very recent experience with these limitations in the sales of both Harmony Place and Rays and Engleside MHCs. In the case of Harmony Place, the Fairfax County Redevelopment and Housing Authority (FCRHA), Catholics for Housing, and Tenants and Workers United (TWU) worked on behalf of the residents to submit a counteroffer when notified of the impending sale. The seller received the offer, "considered" it as required by law, and moved forward with the sale to a new owner. Had there been an enforceable right of first refusal, the residents might have been able to gain control of the property under their homes and preserve their community as committed affordable housing.

Lack of resident organization/self-governance/economic capacity: For many years, the remaining MHCs in Fairfax County were an afterthought relative to housing affordability. As a result, the county did not invest substantial effort in understanding and responding to the needs of residents in these communities. While the value the county places on these communities as affordable housing has changed dramatically in the last five years, the residents are only beginning to build the governance and infrastructure necessary to play a role in preserving their homes. TWU and Fairfax County have invested significant resources in understanding the needs of these communities and assisting the residents in organizing. However, the residents' ability to understand and respond to the market pressures on the MHCs remains very limited.

The lack of available capital for residents to make competitive offers for their communities when they go up for sale is also a major barrier. In the case of the sale of Harmony Place, the county was able to assemble the approximately \$8 million necessary to make a counteroffer – about \$87,000 per pad. However, the county was unable to assist the residents in putting together the

funds to make a competitive offer for Rays and Engleside MHCs at a total of \$24 million, or \$200,000 per pad, as mentioned previously.

From a fair housing standpoint, the residents of Fairfax County's MHCs are largely low-income, linguistically isolated Latino families as discussed in *Exhibit D Subfactor (b)(i): Project Description, Management, and Impact.* Homeownership comes with the responsibility of maintaining the home in a safe and healthy manner in addition to paying off loans and making monthly pad rental payments. These obligations can create hardships if owners have limited funds and need to balance competing demands for other necessities such as food, childcare, or healthcare. Often home maintenance becomes a lower priority, which can lead to regulatory/code non-compliance or safety issues that need to be addressed. MHCs residents are hardworking contributors to the local economy and are disproportionately impacted by the sale and potential redevelopment of these properties, as well as the multiple costs associated with owning a unit, renting the pad, and maintenance expenses.

## EXHIBIT D: SOUNDNESS OF APPROACH (Maximum 50 points)

# i. Subfactor (b)(i): Project Description, Management, and Impact (10 points)

### What are your vision and goals?

Fairfax County envisions the PRICE Main grant will unlock the potential of residents within the county's eight MHCs in partnership with community owners, non-profit organizations, and Fairfax County government to preserve affordability, improve conditions, and empower voices of these communities, recognizing that all residents of these communities should have an equitable opportunity for success. This vision aligns with the County's goal of no net loss of affordable housing and broader principles of the county's One Fairfax Policy, a racial and social equity policy that is looking intentionally, comprehensively, and systematically at barriers that create gaps in opportunities for residents within the county. The vision is defined by recommendations of the county's Manufactured Housing Task Force (MHTF), which were accepted by the county's Board of Supervisors in 2021 but have lacked the resources necessary to fully implement. The MHTF, which intentionally brought together MHC residents, community owners, affordable housing advocates, and representatives of the county's planning commission and the Fairfax County Redevelopment and Housing Authority, were guided by the following goals, which would apply to the PRICE grant activities:

- Preserve, through a variety of means, the affordability of manufactured housing units and communities recognizing that each faces unique circumstances and will require a tailored approach;
- Provide residents the opportunity to fully participate in and benefit from life in Fairfax County, including the policy decisions that directly impact their housing stability; and,
- Provide residents the opportunity to learn about their rights and limitations and provide community owners the opportunity to understand their responsibilities under the law.

The MHTF identified actionable policy, procedural and regulatory improvements, which would be implemented through the PRICE Main grant.

This grant would be beneficial in serving these communities, furthering affordable housing preservation goals in Fairfax County, and implementing the recommendations of the MHTF. If awarded, funding would be used for the purposes of rehabilitation and replacement of existing units, infrastructure improvements, planning activities, resident and community services, resilience activities, and providing other assistance to manufactured housing tenants and homesite renters for land and site acquisition.

### **Description of MHC Sites**

There are approximately 1,750 manufactured homes in Fairfax County within eight MHCs. Six of the eight MHCs are located along the Richmond Highway corridor (Penn Daw Terrace, Woodley Hill Estates, Audubon Estates, Harmony Place, Engleside Mobile Home Park, and Rays Mobile Home Colony). The MHC are both family-owned and owned by national organizations. MHCs owners participated in the MHTF, and it is the intent of Fairfax County to continue to work with and collaborate with MHC owners on the activities described in the grant application. Many of the activities are dependent on the cooperation and agreement of the MHC owners.

Figure 2: Audubon Estates with Floodplain



Audubon Estates is the largest MHC in the Fairfax County and located in Hybla Valley along Richmond Highway. **Number (No.) of Units:** 700. **Size:** 83.7 acres (ac.). **Address:** 7930 Audubon Ave, Alexandria, VA 22306. **Age:** Operating since at least 1972. **Ownership:** It is currently owned by Hometown Audubon LLC, based in Chicago, IL. **Flooding exposure:** There are an estimated 165 structures in the floodplain (see Figure 3). **Demographic and socioeconomic:** 

Compared to the United States population, this site is in the 92<sup>nd</sup> percentile for people of color, 73<sup>rd</sup> percentile for low income, and 88<sup>th</sup> percentile for Limited English Speaking. The park is in Census Tract 4215, which is predominantly Hispanic or Latino (54%), Black or African American (29%), and Asian (12%). Audubon Estates is a documented area of "Very High" Vulnerability with approximately 71% of the population having low educational attainment, 22% severely rent burdened households, and 67% in low-income occupations.<sup>12</sup>

Figure 3: Harmony Place with Floodplain



Harmony Place Trailer Park is a longstanding MHC in the Richmond Highway corridor adjacent to Audubon Estates: **Address:** 8018 Richmond Highway, Alexandria, VA 22306. **No. of Units:** 91. **Size:** 5.26 ac. **Age:** Operating since at least 1953. **Ownership:** The community recently underwent an ownership change in 2021 when it was purchased by SRP Alexandria LLC. **Flooding exposure:** There are an estimated 61 structures in the floodplain (see Figure 4). **Demographic** 

**and socioeconomic:** According to a survey of Harmony Place residents by Northern Virginia Affordable Housing Alliance (NVAHA) and Tenants and Workers United (TWU)<sup>20</sup>, 93% of respondents identify as Hispanic or Latino. Most Harmony Place residents are long-term residents, with 56.6% having lived in Harmony Place for 5 or more years, and 33% for more than 10 years. Most residents own their homes and rent the pads, although many (39.47%) lack a written lease agreement. At least 62.12% of survey respondents are housing cost-burdened, and more than half were unable to pay for necessities. The residents' top concerns include high cost of housing, quality of streets, displacement, and flooding. Harmony Place is also located within Census Tract 4215 which is also predominantly Hispanic or Latino (54%), Black or African American (29%), and Asian (12%).

<sup>&</sup>lt;sup>12</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

Engleside Mobile Home Park and Rays Mobile Home Colony are adjacent MHCs in the Richmond Highway Corridor. Address: 8500 Greenleaf Street (Engleside) and 106 Denfield Drive (Rays), Alexandria, VA 22309 No. of Units: 120. Size: 4.25 ac. (Engleside) and 4.23 ac. (Rays). Age: Operating since at least 1945 (Engleside) and 1961 (Rays). Ownership: (For both): Alexandria MHP, LLC (California). Demographic and socioeconomic: These MHCs are located in Census Tract 4160, which is characterized by Hispanic or Latino (25%), Black or African American (26%), and Asian (11%). The Census Tract is a documented area of "Very High" Vulnerability with approximately 52% of the population having low educational attainment, 32% severely rent burdened households, and 44% in low-income occupations. <sup>13</sup>

Penn Daw Terrace. Address: 6240 Shields Ave, Alexandria, VA 22303. No. of Units: 90. Size: 8.02 ac. Age: Operating since at least 1957. Ownership: Bradley-Epps Lisa Marie Trust. **Demographic and socioeconomic:** This MHC is located in Census Tract 4151, which is characterized by Hispanic or Latino (23%), Black or African American (9%), and Asian (6%). The Census Tract is a documented area of "Low" Vulnerability with approximately 40% of the population having low educational attainment, 32% severely rent burdened households, and 33% in low-income occupations.<sup>14</sup>

Woodley Hills Estates. Address: 2800-3008 Camellia Dr., Alexandria VA 22306. No. of Units: 115. Size: 13.8 ac. Age: Operating since 1991. Ownership: Fairfax County Redevelopment and Housing Authority. Demographic and socioeconomic: This MHC is located in Census Tract 4154.01, which is characterized by Hispanic or Latino (33%), Black or African American (35%), and Asian (11%). The Census Tract is a documented area of "Very High" Vulnerability with approximately 74% of the population having low educational attainment, 56% severely rent burdened households, and 63% in low-income occupations.<sup>15</sup>

Waples Mill Estates. Address: 4308 Mobile Ct., Fairfax, VA 22030. Size: 25.6 ac. Age: Operating since at least 1960. No. of Units: 152. Ownership: Waples Project LP. Demographic and socioeconomic: This MHC is located in Census Tract 4406, which is characterized by Hispanic or Latino (22%), Black or African American (5%), and Asian (26%). The Census Tract is a documented area of "Average" Vulnerability with approximately 40% of the population having low educational attainment, 58% severely rent burdened households, and 32% in lowincome occupations.<sup>16</sup>

Meadows of Chantilly. Address: 4200 Airline Parkway, Chantilly VA 20151. No. of Units: 490. Size: 81.1 ac. Age: Operating since at least 1970. Ownership: MHC Meadows of Chantilly LLC. Demographic and socioeconomic: This MHC is located in Census Tract 4901.04, which is characterized by Hispanic or Latino (44%), Black or African American (4%), and Asian (13%). The Census Tract is a documented area of "High" Vulnerability with approximately 58%

<sup>&</sup>lt;sup>13</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

<sup>&</sup>lt;sup>14</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

<sup>&</sup>lt;sup>15</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

<sup>&</sup>lt;sup>16</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

of the population having low educational attainment, 14% severely rent burdened households, and 50% in low-income occupations.  $^{17}$ 

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

Each PRICE activity proposed will meet a CDBG national objective pursuant to Section 101(c) of the Housing and Community Development Act of 1974 by benefiting low- to moderateincome (LMI) households and meeting an urgent need. The activities that the county would undertake are divided into six main focus areas: understanding community needs and preserving and revitalization of MHCs through repair, rehabilitation, and replacement of units; assessing and improving infrastructure; development activities; resilience and mitigation activities; housing and voluntary supportive service activities to benefit new and existing MHC residents; and planning and regulatory activities to preserve and enhance neighborhood livability within MHCs. These focus areas will be designed to maximize access to homeownership by participants of color and those currently owning manufactured homes.

# 1. Understanding Community Needs; Preserving and Revitalizing Communities:

The following activities will be supported by the PRICE Main funds to provide a range of services to assist MHCs residents in stabilizing their housing and becoming more economically empowered.

# 1.1 Community Surveys and Affordability Analyses

The PRICE Main funds will be used to develop and conduct community surveys to gather information about the challenges and potential improvements in each manufactured housing community as defined by the residents and owners, building off the previously conducted survey of the Harmony Place. The surveys may seek concerns about the on-site maintenance and the condition of the units within the site. The survey may also indicate improvements needed to individual units and infrastructure improvements needed in the community at large. Further, the survey may be used to gather resilience-related information, including both specific site vulnerabilities and feedback on which resilience-related strategies (i.e., flood risk reduction and heat risk reduction options) that the community may support. Using PRICE funds, Fairfax County will survey the MHCs, staggered in a cycle. Surveys will be conducted with the assistance of community partners and driven by community residents. The resulting data will be analyzed and shared with the community, community owners, and policymakers, including the county's Board of Supervisors.

In addition, the grant will be used for bi-annual analyses to identify the affordability levels of the MHCs and measure changes over time. The survey will use data analysis and an equity lens to proactively and intentionally determine the affordability of the MHCs to LMI households (households with incomes at 60% AMI and below). If an MHC is being considered for redevelopment, the data also can be used toward an "affordability analysis" to be conducted as part of the entitlement process to identify communities/households that may be adversely impacted by the redevelopment and possible means to mitigate those impacts.

# 1.2 Grant/Loan Programs for Home Improvements, Rehabilitation, and Replacement

<sup>&</sup>lt;sup>17</sup> Fairfax County Vulnerability Index Map (2016-2020). 2024. <u>Vulnerability Index Map (2016-2020)</u> (arcgis.com).

Using PRICE Main competition funds, the Fairfax County Redevelopment and Housing Authority (FCRHA) will initiate a grant program for owners of manufactured homes to address critical maintenance issues in their homes. The grant funding could be used, for example, for electrical and plumbing upgrades and repairs or for safety improvements. The program is envisioned to start as a pilot for the Harmony Place residents and be operated by a nonprofit organization with experience in providing single-family repair services and expand throughout the other seven MHCs. Projects will benefit households with income at or below 60 percent of the area medium income as defined by the U.S. Department of Housing and Community Development (HUD) for the Washington, DC Metropolitan Area.

A loan program is also envisioned to be established and administered through the FCRHA for the complete replacement of units. At least 230 units across the county were built prior to 1976, and more that 500 are over 40 years old. Coupled with the damage caused by poor or limited maintenance and environmental hazards, such as flooding, a greater number of units will need to be replaced. Using PRICE Main funds, the county will establish a loan program to replace units that were either constructed prior to 1976 or where deteriorated conditions warrant replacement rather than rehabilitation. The loan program could be modeled on previous homebuyer and home improvement programs implemented by the county, which a) provided a pathway to affordable homeownership for LMI households, and b) helped LMI families make the repairs they needed to stay in their homes.

Additionally, county government staff may, as appropriate, assist MHC residents in applying for and obtaining grant funding for resilience-related needs. This may include assistance in accessing funding from the Flood Mitigation Assistance Program (FMAP), which is administered by the Northern Virginia Soil and Water Conservation District (NVSWCD). The FMAP program provides reimbursements up to \$5,000 for small flood-proofing measures such as sump pumps, elevation of equipment, and flood-resilient materials.

# 2. Infrastructure Improvements:

# 2.1 Community Infrastructure Conditions Assessment

Underinvestment in infrastructure is a critical threat to some MHCs in Fairfax County. The infrastructure systems in many MHCs date back decades, and sewer, water, stormwater, and electrical systems are often beyond their anticipated useful life. In addition, some of the existing MHC are partially located within a mapped floodplain. There is a recognized need to provide long term investment in community infrastructure to ensure health and safety of the residents.

Similar to recent work at Harmony Place, Fairfax County and the FCRHA, in cooperative working relationships with property owners, will use PRICE Main grant funds to contract with a qualified firm with expertise in review of site, floodplain and utility conditions. The purpose of this work will be to provide an overall infrastructure assessment of the eight identified MHCs and the common area improvements needed for each community to promote health, safety, and welfare for residents in each community with a focus on livability and accessibility. Many of these utilities are in easements and may have public rights to access. The condition assessments will also provide an estimated cost for the types of repairs needed to help gauge the potential financial resources that may be required. The work will leverage existing and prior conditions assessments, such as the 2021 Harmony Place site and infrastructure assessment conducted.

Inspections may also include a general assessment of the exterior condition of units within the

community as a way to assess overall financial viability. The community surveys (described in focus area 1), will include resident concerns with the maintenance provided by the MHC owner and the condition of the units within the site. The survey may also be an opportunity for residents to voluntarily indicate areas of improvement for individual units and the community. A template for how this may be for all of the communities was recently completed for the Harmony Place community, as stated previously.

# 2.2 Support for MHC Owners for Infrastructure Improvements

Using PRICE Main grant funds, the county through the FCRHA will explore providing financial support to owners of MHC to make infrastructure and other critical improvements to their properties. Such support will be in the form of a loan from the FCRHA, in a manner similar to the FCRHA's work with affordable housing developers. The loans will be dependent on the owner providing affordability guarantees and a right of first refusal for the residents or the FCRHA to purchase the property in the event it is sold. Fairfax County should also maintain a comprehensive list of financial support from all sources, including from the state and local government. The FCRHA will also provide educational and technical support in the form of understanding code requirements and regulations for manufactured housing as addressed in a subsequent section – Code Compliance and Community Quality.

# 3. Manufactured Housing Development Activities:

## **3.1 Support Community Residents and/or Partners in Acquiring Communities;** Community Land Trusts

With the high land values in the county, MHCs have experienced sales and potential redevelopment plans. If these move forward, residents may face rent increases or losing their manufactured homes, when the home cannot be relocated, and their communities. Losing their community has a high social and economic impact on residents. Using the PRICE Main grant as a source of acquisition capital, residents may have access to funding to assist in purchasing the land under their homes and participate in management of the park. As an example, although unsuccessful in the purchase, the efforts by the residents of Harmony Place, Tenants and Workers United, Catholics for Housing, the FCRHA, and Fairfax County in 2021 provide a template for assisting residents of MHCs in purchasing the land under their homes. The Harmony Place experience could be used as a model in future situations where a property is for sale and the residents would like to organize and make an offer to purchase. The county encourages nonprofit organizations to engage and collaborate with residents of MHCs. Other creative models that may be considered include the use of Community Land Trusts for the preservation of the MHCs, redeveloping MHCs with affordable replacement housing, and the creation of affordable homeownership opportunities.

# 4. Mitigation and Resilience Activities

As detailed in *Exhibit D: Soundness of Approach: Subfactor (b)(iii) Environment and Resilience,* PRICE funds may be used to enhance resilience to flooding, severe storms, and heat.

# 4.1 Flood Resilience Activities

Flood resilience options include flood sensors and warning systems; flood-resilience education, resources and contacts; expanded access to assistance navigating flooding-related services such as the Flood Mitigation Assistance Program (FMAP) and Conservation Assistance Program (CAP); elevation of critical equipment above base flood elevation; replacement of flood-

damaged units erected prior to 1976; removal of debris and other stormwater blockages; and upgrades using flood-resilient materials. Additionally, the grant may be used towards studies and analyses to plan for larger-scale capital improvements, potential land acquisition, or elevation or relocation of units to reduce flood risk.

# 4.2 Wind and Storm Resilience Activities

The PRICE Main grant may be used for wind and storm resilience options include utility coordination with Dominion Energy for power resilience upgrades; storm-related emergency preparedness resources and guidance; small back-up power sources for those who are medically reliant on electric devices; and replacement of pre-1976 units with modern units that meet modern wind resilience standards. Additionally, planning and analyses for larger-scale future improvements may include planning for possible storm shelters or tornado rooms.

# 4.3 Heat Resilience Activities

Heat resilience options include enhanced access to heat services such as cooling assistance and cooling centers, heat emergency contacts and guidance; tree plantings; energy efficiency upgrades; and cool pavers, as detailed in *Exhibit D. Subfactor (b)(iii)*.

# 5. Housing and voluntary supportive service activities that support new and existing residents of MHCs:

# 5.1 Early Warning for Households at Risk of Facing Eviction Due to Non-Payment of Rent

The PRICE Main grant can be used to create an early warning system for households at risk of eviction due to non-payment of rent. The warning system will proactively create outreach channels to manufactured housing park owners to inquire about delinquencies and connect landlords and tenants to the county's Department of Neighborhood and Community Services (NCS) programs and services such as Eviction Prevention Program and Economic Mobility Partners before an eviction action is filed against them. Similarly, using the system, landlords can proactively contact the aforementioned NCS programs to alert them to delinquencies before filing any eviction action.

# **5.2 Management Practices**

Management practices vary among the MHC in the county. Some MHCs continue to face challenges, such as fear of retaliatory actions against residents who raise concerns. The county, in consultation with all stakeholders, will use the PRICE grant to create guidelines for standards of conduct based on best practices for MHC management.

# 5.3 Relocation and Downpayment Assistance

Current laws provide limited compensation for assistance for relocation expenses. Through the PRICE Main, relocation and downpayment assistance may be offered for payments and assistance to displaced residents, such as those who are projected to be displaced by the upcoming Richmond Highway and BRT road improvements, and those residents who may wish to be relocated within the sites to reduce flooding risk. Assistance may include providing relocation advisory services, temporary and/or permanent relocation assistance, paying applicable costs to relocate eligible MHC residents into more traditional forms of homeownership with long-term affordability.

# 6. Planning and Regulatory Activities Around Manufactured Housing Residents and

# MHCs:

# 6.1 Comprehensive Plan and Zoning Ordinance Amendments

Increasing land values in Fairfax County can make MHCs targets for rent increases and redevelopment. Some MHCs do not meet current ordinances and regulations such as the Zoning Ordinance or floodplain regulations. The PRICE Main grant can be used to support comprehensive plan and zoning ordinance amendment activities, especially community engagement activities, to better address the needs of the MHCs. The grant may be used to consider amendments to the current Comprehensive Plan to consider incorporating the county's commitment to maintaining and improving the quality of MHCs as sources of affordable housing or, if redevelopment is planned, strategies for achieving the goal of no net loss of the affordability of units through replacement options and other county incentives.

Similarly, updating the county's Zoning Ordinance may be considered through the PRICE grant as a means to assist in maintaining the viability of such communities. The existing MHCs were established under prior Zoning Ordinances and are nonconforming either because they are zoned to a commercial or industrial district, where manufactured home parks are not permitted, or, if zoned to the R-MHP (Residential, Manufactured Home Park) District, do not meet the R-MHP minimum district size (15 acres), open space (20 percent of the gross area), setbacks between units or because they exceed the maximum density (6 du/ac). In addition, some of the existing MHCs are located partially within mapped floodplains. The grant may be used to consider amendments to the current R-MHP Zoning District to review setback requirements and to address the nonconforming status of these "legacy" communities, such as providing opportunities to permit the construction of porches, decks and other accessory structures, or creating a special exception process for MHCs to address the regulatory issues.

# 6.2 Review of the Code Requirements and Regulations for Manufactured Housing Communities

A clear understanding of all the federal, state, and local governing codes and regulations is required to truly understand the applicability of each to MHCs. The PRICE Main grant will be used to conduct a comprehensive review of the applicable codes and regulations at the local, state, and federal level to understand the code requirements, enforcement mechanisms, responsible parties, and complaint processes for both manufactured homes and MHCs. Initiatives and best practices by other local communities on code and enforcement for the construction, location, installation, use and maintenance of manufactured homes also may be studied.

From this review, a comprehensive list of codes, regulations, and resources for MHCs at the local, state, and federal levels can be made available to manufactured homeowners, tenants, and MHC owners. Additional informational and educational materials on regulatory policy and procedures for manufactured home property/site owners, unit owners, and renters can be developed and included at outreach and education at community meetings and events. It is important to determine the condition of the MHCs and develop a menu of the most common code violations, needed repairs and associated costs.

# 6.4 Resolving Code Violations and Creating a Reserve Fund for Compliance Support

There are known code violations at MHCs that are currently being processed by the county's Department of Code Compliance. County agencies will work collaboratively with each other and with property owners to help resolve these violations, especially for issues that are a threat to

health and safety. The PRICE Main grant may be used to develop an informed reserve fund based upon the current stock of manufactured homes in the county, the most common code violations, needed repairs, and associated costs. The funds may be used to assist with resolution of the issues, similar to the grant/loan program discussed for home improvements in focus area 1.2. Staff will develop procedures for allocating funds including communications on funding availability and the method for obtaining and using the funds.

What is your	timeline an	d kev tasks	along that	t timeline?
vinat is your	unitenne an	u ney tubis	anong ma	, and the second s

Key Tasks	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Understanding Community Needs; Preserving and Revitalizing Communities:						
1.1 Community Surveys and Affordability Analyses	Х	X	Х	Х	Х	Х
1.2 Home Improvements, Rehabilitation, and Replacement Programs	Х	Х	Х	Х		
2. Infrastructure Improvements						
2.1 Conditions Assessment	Х	X	Х	Х		
2.2 MHC Improvements	Х	Х	Х	Х	Х	Х
3. Development Activities						
3.1 Land Acquisition; CLTs	Х	X	Х	Х	X	Х
4. Mitigation and Resilience Activities						
4.1 Flood Resilience Activities, such as: flood-proofing funding, flood service improvements, and aid; guidance and education; sensors and warning systems; elevation of critical equipment and units; flood resilient materials and replacements; and planning and analysis for capital projects and acquisition	X	X	X	X	X	X
4.2 Wind Resilience Activities, such as: utility coordination for power resilience; wind-resilient materials; education and guidance; and planning for storm shelters	X	X	X	X	X	X
4.3 Heat Resilience Activities, such as: heat-related services such as Cooling Assistance; guidance on heat-related protocols and Cooling Centers; cool	Х	Х	Х	Х	X	X

Key Tasks	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
pavements; planting of shade trees; and energy efficiency upgrades						
5. Supportive Services						
5.1 Early Warnings for Households at Risk of Eviction	X	X	Х	Х	Х	Х
5.2 Eviction Prevention and Management Practices	X	X	Х	Х	X	Х
5.3 Relocation and Downpayment Assistance	X	X	Х	Х	X	Х
6.Planning and Regulatory Activities						
6.1 Comprehensive Planning and Zoning Ordinance Amendments	X	Х	Х	Х	X	
6.2 Review of Code Requirements and Regulations for MHCs	X	Х				
6.3 Code Resolution and Code Compliance Reserve Fund for Code/Utility Compliance Support	Х	Х	Х	Х		

The previously outlined activities will have separate and often overlapping timelines. Fairfax County has committed a new Manufactured Housing Coordinator staff position to oversee the body of work and manage the different activities, interagency coordination, and community engagement. The PRICE Main grant can unlock the potential to accomplish the work. There are several priority areas where the work will begin immediately upon funding. For example, the community needs and affordability surveys and conditions assessments are essential to gain an understanding of the needs of residents and to determine conditions of the communities and improvements needed. The results will lay the foundation for other activities. These surveys will involve the support from residents and community partners to design and conduct the work and are estimated to take a few months to set up, distribute, and collect data.

# What is your budget?

The budget for the PRICE Main activities described in the grant application is at least approximately \$48,050,000, with the PRICE application requesting \$39,550,000 and \$8,500,000 of match and leverage funds, as detailed in *Exhibit F: Match or Leverage*. The largest portion of the PRICE grant (\$23,950,000) will be used for the "Understanding Community Needs and Preserving and Revitalizing Communities" category. As mentioned in previous sections, over 230 manufactured homes were constructed prior to 1976. A maximum of \$15,000,000 will be spent to replace these homes. The removal and replacement of units may cost up to \$150,000 per unit in Fairfax County because of the level of deterioration and potential need for demolition and removal of the unit, in addition to the cost of the new unit and its installation.

At least an additional 620 homes are 30 years old and built after 1976. Many of these homes have deferred maintenance, are non-conforming with current zoning regulations, and will require financial assistance to complete the improvements. Another \$8,750,000 will be directed toward

rehabilitation of homes. The rehabilitation and replacement work will be supported through revolving community needs surveys to gain information about the scale of the improvements. The survey work is budgeted for \$200,000 to develop and distribute over the period of performance. The county has dedicated nearly \$500,000 of CDBG funds to complement the proposed PRICE amount. Related supportive services including relocation and downpayment assistance involved in such activities as the rehabilitation and replacement work and eviction prevention services, are budgeted for up to \$650,000. Additional planning and regulatory activities are calculated up to \$2,250,000.

A maximum of \$3,000,000 from the PRICE application will be dedicated to infrastructure improvements, which will include both conditions assessments for the MHCs and the improvements. \$10,050,000 will be committed to supporting land acquisition (\$6,500,000), including voluntary buyouts and residents who are seeking to buy their communities, and mitigation and resilience activities (\$3,550,000). Flood mitigation and resilience activities may include expanding access to flooding-related services such as the Flood Mitigation Assistance Program (FMAP) and Conservation Assistance Program (FMAP), flooding guidance and education, flooding warning systems, flood-resilient materials and replacements, and planning and analysis for capital projects and acquisition. Wind Resilience and mitigation activities may include utility coordination for power resilience, wind resilience activities may include expanding access to heat-related services such as cooling assistance and cooling centers, cool pavement and cool roof installations, planting of shade trees, and energy efficiency upgrades.

County staff are prepared to use PRICE Main funding for any of the possible resilience options listed above. Specific options will be selected in coordination with the MHC property owners and residents. PRICE Main is pivotal to implementing the activities outlined in this application. Without PRICE funds, the execution of these activities will be spread over longer timeframes, risking further housing instability and environmental hazard effects for MHC residents.

### What are the projected impacts of your activities if implemented?

It is anticipated that a significant number of manufactured housing owners will have their units improved or replaced, and that the affordability that exists in the MHCs will be preserved to the greatest extent possible. Homebuyer resources fund will offer owners of manufactured homes a version of affordable homeownership that affords true wealth-building opportunities. It is anticipated that this will contribute to overcoming the barriers to homeownership faced by people of color in the county.

In addition, local leaders will be better informed of the needs of residents and owners of MHCs, and appropriate resources provided to ensure housing stability and resilience to natural hazards. The county will gain an in-depth understanding of the needs of the residents of MHCs to assist them more effectively with community improvement needs, displacement challenges, and resiliency efforts. The activities will identify and implement to the extent possible solutions to resolve environmental hazards. The process to understanding and address community needs will be centered around the principle that the residents' voice in partnership with the community owner.

On a case-by-case basis, land use policies and regulation may be modified to further support preservation and neighborhood livability within MHCs. The activities will clarify Comprehensive Plan language and update the Zoning Ordinance to help facilitate the preservation of MHCs and/or their long-term affordability. The compilation of local, state, and federal codes that apply to MHCs, both the units and the sites will increase knowledge about safe and healthy living conditions for the residents and assist unit owners in accessing information and complying with code requirements. Code compliance will enhance resident safety and community quality.

From a climate resilience perspective, the proposed activities would enable the residents of the MHCs to better withstand and "bounce back" from intensifying climatic shocks and stressors including flooding, extreme heat, and severe storms. Most importantly, resilience activities will help to protect the residents from permanent loss of life and possessions. Day-to-day, the resilience improvements will also improve the quality of life and comfort of residents. They will also alleviate the financial burden on residents who may not otherwise be aware of or have access to flood-proofing services, cooling assistance for air conditioning bills, energy efficiency services, and replacement of damaged property. Additionally, boosting the resilience of the MHCs to climate hazards helps to ensure that the MHCs can be preserved as a long-lasting source of affordable housing in the county, rather than being too thoroughly damaged or destroyed over time by intensifying and repeated climate conditions.

# ii. Subfactor (b)(ii): Affordability and Equity (15 points)

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

PRICE grant funding would provide Fairfax County with a targeted pool of funding to assist in providing MHC residents with long-term affordability and stability, and thus helping residents build wealth and financial security. The residents of MHCs are disproportionately LMI households that may face difficulties finding other forms of housing in Fairfax County. Affordability for LMI households residing in MHCs may come in the form of restricted pad rents, resident land ownership, or alternatives to manufactured housing such as more "conventional" affordable homeownership – all depending on the types of opportunities that present themselves in the market.

Restricting the rent for pads to levels that are affordable for residents will ensure continued affordability that is consistent and predictable. When providing financial assistance to a project the FCRHA requires a minimum of 30 years of affordability through a Land Use Restriction Agreement or Ground Lease. The goal for any MHC receiving assistance would be to preserve affordability in perpetuity. The FCRHA also requires Rights of First Refusal on properties that receive support and utilizes these rights to re-negotiate extended affordability beyond the scope of an original agreement. Restricting rents long-term assists residents in wealth-building by providing stability and consistency that likely does not occur when pad rents are market rate. The ability to save money and build wealth depends on having stable housing that is affordable and allows the household room in their budget to achieve financial success.

Ownership of the land that MHC residents would otherwise rent provides another option for long-term affordability and stability, enabling residents to build wealth and achieve financial security. Opportunities to purchase individually or via other means may arise quickly and require funding on-hand to be able to execute. One mechanism that has been contemplated as a potential vehicle for homeownership is the formation of Community Land Trusts when an opportunity to purchase an MHC arises. This solution entails the residents forming a group at the earliest opportunity, with help from Fairfax County, to purchase the land under their homes and participate in the management of the community. The PRICE grant would provide Fairfax County funding to residents who wish to own the land under their home when an opportunity arises to do so, thereby ensuring self-governance of the property and long-term affordability.

The grant program for home rehabilitation and improvements, anticipated to be piloted first at Harmony Plan, is another vehicle to assisting LMI households within MHCs in achieving improved financial security. Over 500 of the existing manufactured homes in Fairfax County are 40 or more years old, and thus likely require structural improvements that may be costly for residents. Assisting residents with improvements through grants will help alleviate the burden that comes with home repairs. The PRICE grant would fund this important grant program that will help relieve some of the financial burden that comes with owning an aging home.

In Fairfax County, residents of MHCs are disproportionately LMI earners and members of vulnerable populations. Providing targeted funding for MHCs through the PRICE grant enables Fairfax County to support those who are in the greatest need of assistance in building wealth, overcoming historic barriers to services and financial support, and achieving financial security. Relieving rent burden, providing homeownership opportunities, and assisting with costly repairs are important mechanisms of providing such assistance.

# What protections will be in place for residents?

The MHCs within Fairfax County, with the exception of Woodley Hills, are privately owned and therefore subject to the rules and regulations put in place by the property owners. Where PRICE grant funding or other FCRHA funding is utilized to purchase MHCs or provide loans to MHC owners, tenant protections will be put in place including commitments to affordability levels and stable increases, as well as a right of first refusal for the residents or the FCRHA to purchase the property in the event it is sold. In the case of the FCRHA purchasing and operating additional MHCs (the FCRHA currently owns Woodley Hills Estates), tenant protections that the FCRHA currently utilizes for its properties will be applied. Various tenant protections. Residents of FCRHA meet or exceed the Fannie Mae and Freddie Mac tenant protections. Residents of FCRHA-owned properties are subject to one-year leases, as advised by Fannie Mae and Freddie Mac. Residents have a seven-day grace period for late rent payments, which exceeds this guidance. Additional tenant protections specific to manufactured homes will be applied similarly the community currently owned by the FCRHA, Woodley Hills Estates. The procedures for tenant leases at Woodley Hills meet or exceed the provisions set forth in the Virginia Manufactured Home Lot Rental Act.

HCD is currently updating the Fairfax County Relocation Guidelines to conform with federal relocation guidelines. The guidelines will include provisions for fair market value that mirror those set by HUD. These relocation guidelines will be applicable to residents of MHCs in the county by informing any Resident Displacement Plans that are created to inform potential displacement due to eminent domain, natural disaster, hazardous conditions or redevelopment.

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

The Fairfax County Redevelopment and Housing Authority (FCRHA) is the county's local housing finance agency and has decades of experience providing LMI families with access to financing and other resources to secure and maintain affordable homeownership. The PRICE grant will provide Fairfax County and the FCRHA with the resources it needs to better

understand and serve the unique needs and vulnerabilities of the county's MHC residents. It should be noted that the residents of Fairfax County's MHCs tend to be low- income households, many of which have both language and educational barriers to economic success.

Surveys will be done in accordance with the methodology used for a community survey done at Harmony Place, which utilized community partners and was driven by community residents. The surveys should include any updates to the methodology based on lessons learned from Harmony Place. This robust community survey will help HCD staff gain an in-depth understanding of needs of the MHC residents. Surveys will seek to gain information that will assist staff in providing resources specific to the needs of the residents and prioritizing assistance based on the greatest needs. Staff will gain a further understanding of population vulnerabilities including disabilities, poverty levels and needs for services including those targeted for transportation, financial assistance, and/or health.

Fairfax County works with a robust array of non-profit groups that may be able to assist in providing necessary services to residents in need. Critically, the county is hiring a dedicated Manufactured Housing Coordinator to provide direct intervention for the needs of the MHCs and their residents and will serve as the manager of programs funded by the PRICE grant.

As a public housing agency (PHA), the FCRHA also has long experience in promoting economic opportunities for low-income households, in furtherance of our obligations under Section 3. The FCRHA is fully compliant with all requirements under Section 3, and along with Fairfax County is committed to providing opportunities for economic advancement to such households. One recent example of the FCRHA's commitment to promoting economic advancements for its low-and moderate-income residents is its new scholarship program, which provides up to \$5,000 per year for up to ten eligible residents of the FCRHA's properties.

# iii. Subfactor (b)(iii): Environment and Resilience (15 points)

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

The top hazards that impact the project sites are flooding, severe storms and wind, and extreme heat. This section describes those hazards. To reduce

duplication, a description of activities to enhance resilience to these hazards is in the next section: *"How will your activities address the current and future threat of natural hazards, extreme weather, and disaster event?"* Additional information can also be found in *Exhibit D: Need: Does your proposal increase resilience in any disaster-prone areas*?

# Flooding Vulnerabilities:

Flooding is the top climate-related vulnerability in Fairfax County, due to high exposure, high sensitivity, and poor adaptative capacity of populations and infrastructure.<sup>18</sup> Two of the oldest MHCs in Fairfax County, Harmony Place and Audubon Estates, are located directly within Federal Emergency

Figure 4: Harmony Place Flooding July 2019



<sup>&</sup>lt;sup>18</sup> <u>Resilient Fairfax – Vulnerability and Risk Assessment (VRA) 2022 (fairfaxcounty.gov)</u>

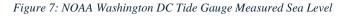
Management Agency (FEMA) 100-year and 500-year floodplains and are severely flood-prone. Between these two MHCs, there are an estimated 200 address points and 229 buildings that are within FEMA Special Flood Hazard Area Zone AE, FEMA Zone X, or County Recorded floodplains. This has led to a history of serious flooding issues that required evacuation of multiple residences.

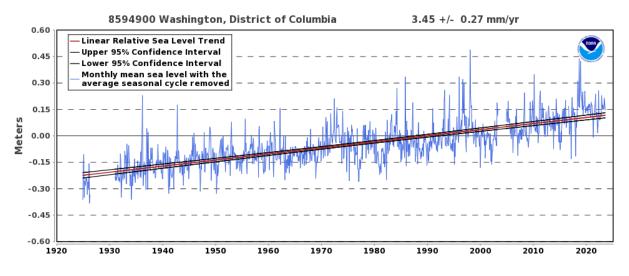


Figure 5: Audubon and Harmony Place MHCs in relation to the floodplain.

Figure 6: Fairfax County Fire and Rescue at Harmony Place July 2019

The flooding issues at Harmony Place and Audubon are projected to worsen. Floodplain flooding is increasing in Fairfax County due to the rise of the Potomac River and associated tidal water bodies, which are affected by sea level. The Potomac River has risen 13.56 inches since 1924.<sup>19</sup> An additional one to three feet of sea level rise is projected by 2050.<sup>20</sup>





<sup>19</sup> <u>https://tidesandcurrents.noaa.gov/sltrends/sltrends\_station.shtml?id=8594900</u>

<sup>20</sup> Resilient Fairfax - Climate Projections Report (CPR) 2022 (fairfaxcounty.gov)

In addition to floodplain or riverine flooding, the county's MHCs are vulnerable to urban or pluvial flooding. Urban flooding has been increasing over time in Fairfax County due to the increase in precipitation intensity<sup>21</sup> and urbanization. All eight MHCs have urban flooding vulnerabilities due to factors such as the presence of sumps, excess impervious surface, insufficient stormwater infrastructure, and/or blocked overland relief pathways. These conditions cause flooding-related vulnerabilities such as direct health and safety risks, reduced water quality from contamination, and loss of access to emergency and medical care. Indirect sensitivities include increased water-borne vectors and pathogens, mold exposure, and worsened allergies and asthma. Disproportionate adaptive capacity factors include lower access to adequate and safe stormwater management infrastructure, flood-proofing and safety retrofits, and flood insurance.

The county seeks to mitigate and prevent structural flooding whenever possible. These communities' proximity to the floodplain makes it challenging to prevent all structural flooding. With this grant, it is possible to make the manufactured homes more resilient while also preserving the availability of affordable housing.

#### Severe Storm, Wind, and Power Outage Vulnerabilities

Severe storm and wind events are increasing in frequency and intensity in Fairfax County,<sup>22</sup> which increases the risk of power outage-related vulnerabilities, storm-related damage to homes and infrastructure, and other direct health and safety risks to residents.<sup>23</sup> Transmission and distribution systems are particularly sensitive to damage from high winds, which can cause power outages and fire risks. In the event of a severe storm or wind event, power outages are more likely to occur in areas with weakened power lines and other electricity infrastructure vulnerabilities, such as those at Harmony Place.

Harmony Place residents have consistently expressed concerns<sup>24</sup> <sup>25</sup> about degraded infrastructure in their neighborhood. A site assessment in November 2021 found deteriorating low-voltage distribution cables, cables running over trailer roofs, and structural weaknesses in meter boards.<sup>26</sup> Storm-related power outages exacerbate a range of vulnerabilities for vulnerable populations. The most vulnerable residents are those who rely on electricity-dependent medical equipment (DME) and devices, for whom power outages can be life-threatening. The zip codes that are home to Fairfax County's MHCs have a total of 584

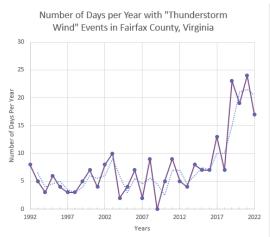


Figure 6: Number of Days with Thunderstorm Wind Events 1992-2023

<sup>&</sup>lt;sup>21</sup> <u>Resilient Fairfax - Climate Projections Report (CPR) 2022 (fairfaxcounty.gov)</u>

<sup>&</sup>lt;sup>22</sup> <u>Resilient Fairfax - Climate Projections Report (CPR) 2022 (fairfaxcounty.gov)</u>

<sup>&</sup>lt;sup>23</sup> Resilient Fairfax Vulnerability and Risk Assessment (VRA) 2022 (fairfaxcounty.gov)

<sup>&</sup>lt;sup>24</sup> Tenants Press for Repairs by Next Owner of Harmony Place Mobile Home Park (connectionnewspapers.com)

<sup>&</sup>lt;sup>25</sup> <u>Harmony Place Mobile Home Residents in Alexandria South Demand Repairs be Part of Upcoming Sale - The Zebra-Good</u> News in Alexandria

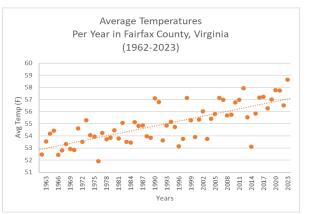
<sup>&</sup>lt;sup>26</sup> Blue Heron Leadership Group. (2021). Harmony Place Mobile Home Park Condition Assessment.

residents with this vulnerability.<sup>27</sup> In addition to DMEs, power outages can exacerbate other vulnerabilities, such as increased heat stress or hypothermia, loss of refrigerated medication and food, and lack of access to communications devices. MHCs are also vulnerable to direct damage due to high wind speeds. Many of the existing homes in the MHCs were erected prior to the new HUD Code wind load standards that were put in place after Hurricane Andrew in 1994, <sup>28</sup> and are therefore likely to lack those resilience benefits. FEMA's Composite Wind Zone Map shows that Fairfax County is in Zone II with wind speeds up to 160 mph and in the Hurricane-Susceptible Region<sup>29</sup>.

## Extreme Heat Vulnerabilities:

Extreme heat is increasing over time in Fairfax County. Average temperatures per year have risen by more than 4 °F since 1962, and an additional rise of 4.4 - 8°F is projected by 2085. Most notably, hot nights (or the number of nights per year that never drop below 70°F) are increasing, which poses a problem for those without sufficient access to air conditioning. The number of extreme heat days per year is also projected to continue increasing<sup>30</sup>,<sup>31</sup>. In addition to general temperature trends, the Urban Heat Island effect causes urbanized areas to retain





more heat than rural areas due to greater concentration of paved surfaces, fewer trees and green spaces, and more waste heat (e.g., car exhaust). The county's eight MHCs are largely located in or near the county's Urban Heat Islands.<sup>32</sup>,<sup>33</sup>

Heat-related vulnerabilities include heat-related illnesses such as heat stroke, dehydration, and cardiovascular, respiratory, and cerebrovascular disease; exacerbation of existing health conditions such as kidney disease through heat exposure; increase of communicable disease due to time indoors during extreme heat; ground-level ozone, mold growth, asthma, stress and mental health impacts; exposure to vector-borne diseases carried by mosquitos and ticks; exposure to harmful algae and pathogens, and financial energy burden. LMI populations such as those in MHCs tend to have lower adaptive capacity for extreme heat due to lower disposable income for air conditioning, lower-quality ventilation, and lower access to tree canopy and green space.

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

### **Resilience to Riverine and Urban Flooding**

As detailed in *Exhibit C: Need – Increasing Resilience in Disaster-Prone Areas*, and in the section above (*What significant hazards could impact your project site(s)?*), Fairfax County's

<sup>&</sup>lt;sup>27</sup> HHS emPOWER Map

<sup>&</sup>lt;sup>28</sup> Factory-Built Housing for Affordability, Efficiency, and Resilience | HUD USER

<sup>&</sup>lt;sup>29</sup> Designing for Natural Hazards: A Resilience Guide for Builders and Developers - Volume 1: Wind (huduser.gov)

<sup>&</sup>lt;sup>30</sup> <u>Resilient Fairfax Climate Projections Report 2022 (fairfaxcounty.gov)</u>

<sup>&</sup>lt;sup>31</sup> Overall Resilience Metrics | Office of Environmental and Energy Coordination (fairfaxcounty.gov)

<sup>32</sup> Resilient Fairfax Interactive Map Viewer (arcgis.com)

<sup>&</sup>lt;sup>33</sup> NASA Develop Fairfax County Urban Heat Island Effect Study

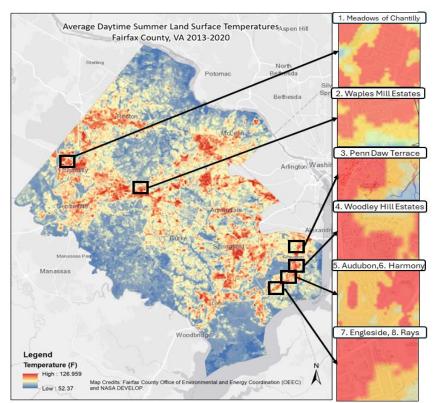


Figure 10: Manufactured Housing Communities in Relation to Urban Heat Islands in Fairfax County MHCs are vulnerable to a range of flooding-related impacts. The PRICE Main grant may be used to enhance the

safety and stability of the MHCs through a menu of techniques that may include the following:

<u>Enhanced access to</u> <u>flooding-related services</u>: including assistance in applying for the county's Flood Mitigation Assistance Program (FMAP), flood insurance, the Conservation Assistance Program (CAP), or help submitting stormwater service requests.

<u>Emergency contacts and</u> <u>guidance:</u> including information on who to call during flooding-related

emergencies of different types, how to evacuate, and how to prepare for emergencies.

*<u>Flood barriers and deployable supplies</u>*: such as sandless sandbags, flood walls, flood gates, and other deployable measures, for short-term relief where appropriate.

*<u>Flood sensors and alarm systems</u>*: to better ensure the safety of MHCs in particularly floodprone areas, such as those in Harmony Place and Audubon Estates.

<u>Elevation of critical equipment and homes</u>: such as elevation of HVAC or other mechanical and electrical equipment above the Base Flood Elevation, with additional freeboard for safety. The county will explore whether elevation of the housing units themselves is advisable.

<u>Repair of flood damage</u>: such as damage to units or components built after 1976 that have been flood damaged.

<u>Use of flood-resilient materials</u>: which may include flood-resilient walls, insulation, windows, HVAC covers, or other materials.

<u>Planning for capital improvements, green infrastructure, and other infrastructural upgrades</u>: such as analyses, engineering, and planning for larger-scale improvements that could include concepts such as a protective berm and trail between the community and the water body, culvert upgrades, or other stormwater infrastructure upgrades. Where feasible, green infrastructure and Low Impact Development (LID) techniques may be used to better absorb stormwater.

*Land acquisition planning, permitting, and associated tasks:* to ensure resident safety and to prevent displacement.

<u>Removal of debris and other stormwater blockages</u>: including coordination with VDOT for removal of debris that exacerbates flooding and education of the community on how to request help with debris removal, along with any action they can take themselves, if applicable.

# Resilience to Severe Storms/Wind and Power Outage Vulnerabilities:

As detailed in *Exhibit C: Need – Increasing Resilience in Disaster-Prone Areas*, and in the section above, *(What significant hazards could impact your project site(s)?)*, the MHCs in Fairfax County are also vulnerable to increasingly severe storms and associated impacts such as power outages. The PRICE Main grant would enhance the safety and stability of the MHCs as it relates to this hazard through a menu of options that may include:

<u>Emergency contacts, emergency kit supplies, and guidance</u>: to ensure residents are prepared with phone numbers for utility companies, county agencies, personal emergency contacts, and access to translated copies of the Community Emergency Response Guide (CERG), which instructs residents in taking preparedness actions. These efforts may include electrical safety education to prevent injury or loss of life in cases of downed wires or use of back-up power generators.

<u>Utility coordination</u>: County staff will explore options for coordinating with the MHC owner, property manager, and utility companies such as Dominion Energy, Northern Virginia Electric Cooperative (NOVEC), Fairfax Water, Washington Gas, Comcast, and Verizon, to ameliorate any utility-related issues. For example, a 2021 conditions assessment at Harmony Place found a need for "protection and proper support of electrical feeds, replacement of meter bank boards, and clearing access to meter banks that are currently inaccessible."<sup>34</sup>

<u>Back-up power</u>: This project may include provision of small back-up power options for MHC residents, such as battery-powered generators, for those who are medically reliant on electrical devices. The purpose is to prevent outage-related fatalities.

<u>*Wind-resilient materials:*</u> This project will explore options for improvements to MHCs that increase each unit's resilience to high winds to prevent damage to neighborhood infrastructure, such as: adequately protected windows, doors, garages, and frames; wind-resilient roof cover; and properly fastened mounted HVAC equipment.

<u>Storm and tornado shelters</u>: for MHCs that lack access to a safe place to shelter, staff may pursue storm shelter options.

# Resilience to Extreme Heat:

As detailed in *Exhibit C: Need – Increasing Resilience in Disaster-Prone Areas* and in the section above, *(What significant hazards could impact your project site(s)?)*, the MHCs in Fairfax County are also disproportionately vulnerable to extreme heat and the Urban Heat Island (UHI) effect. The PRICE Main grant can be used towards a menu of heat resilience options including the following:

*Effective distribution of aid:* such as supporting qualifying households in applying for Cooling Assistance for air conditioning costs and equipment for units where such assistance is needed.

<sup>&</sup>lt;sup>34</sup> Blue Heron Leadership Group. (2021). Harmony Place Mobile Home Park Condition Assessment.

*Emergency contacts and guidance*: such as who to call in cases of heat-related illness emergencies, where cooling centers are located, and how to prepare for extreme heat.

<u>Resilient tree plantings</u>: to mitigate the UHI effect by installing resilient, non-invasive trees on MHC sites as site conditions allow. To maximize benefits and longevity, tree selection will specifically consider resilient and adaptive species.

<u>Cool roofs and pavements</u>: including exploration of options for applying reflective coatings or materials to roofs to reduce home energy consumption and to pavements to reduce land surface temperature, which contributes to the UHI effect.

<u>Energy efficiency upgrades</u>: including weatherization, improvements in insulation, and heat pump installations or other energy-efficient HVAC systems, in coordination with entities such as community housing partners

# How does your proposal help advance Environmental Justice (as defined in Section I.A.4 of this NOFO)?

This proposal seeks to advance environmental justice by reducing disproportionate exposure to flooding, extreme heat, storm damage, environmental health impacts of sub-standard infrastructure and housing, and other environmental hazards for the county's MHCs. The MHCs often disproportionately comprise LMI households and communities of color, as summarized in the table below. (Please see *Subfactor (b)(i): Project Description, Management, and Impact – Description of MHC sites* for additional demographic and socioeconomic information).

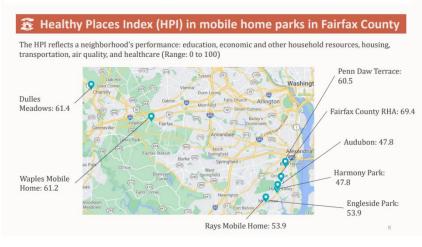
Name	Address	People of Color	Low Income	Limited English Speaking	Less than HS Education
Audubon Estates	7930 Audubon Ave Alexandria, VA 22306	92 <sup>nd</sup> percentile	73 <sup>rd</sup> percentile	88 <sup>th</sup> percentile	98 <sup>th</sup> percentile
Harmony Place Mobile Home Park	8018 Richmond Highway 22306	92 <sup>nd</sup> percentile	73 <sup>rd</sup> percentile	88 <sup>th</sup> percentile	98 <sup>th</sup> percentile
Engleside Mobile Home Park	8500 Greenleaf Street, Alexandria, VA 22309	78 <sup>th</sup> percentile	75 <sup>th</sup> percentile	57 <sup>th</sup> percentile	55 <sup>th</sup> percentile
Rays Mobile Home Colony	106 Denfield Dr Alexandria VA 22309	78 <sup>th</sup> percentile	75 <sup>th</sup> percentile	57 <sup>th</sup> percentile	55 <sup>th</sup> percentile
Penn Daw Terrace	6240 Shields Ave 22303	66 <sup>th</sup> percentile	34 <sup>th</sup> percentile	87 <sup>th</sup> percentile	58 <sup>th</sup> percentile

 Table 3: US EPA Environmental Justice Index (EJ Index) Indicators

Name	Address	People of Color	Low Income	Limited English Speaking	Less than HS Education
Woodley Hill Estates	2800-3008 Camellia Dr Alexandria VA 22306	84 <sup>th</sup> percentile	45 <sup>th</sup> percentile	91 <sup>st</sup> percentile	99 <sup>th</sup> percentile
Waples Mill	4308 Mobile Ct	68 <sup>th</sup>	28 <sup>th</sup>	89 <sup>th</sup>	63 <sup>rd</sup>
Estates	Fairfax VA 22030	percentile	percentile	percentile	percentile
Meadows of	4200 Airline Parkway,	87 <sup>th</sup>	92 <sup>nd</sup>	94 <sup>th</sup>	80 <sup>th</sup>
Chantilly	Chantilly VA 20151	percentile	percentile	percentile	percentile

The Fairfax County Manufactured Housing Task Force in 2020 presented the Healthy Places Index (HPI) reflecting a neighborhood's quality of life based on environmental and socioeconomic indicators. Of the county's 8 MHCs, Harmony Place and Audubon Estates ranked the lowest. At Harmony Place, 93% of residents are Hispanic/Latino.<sup>35</sup> As documented throughout this narrative including in *Exhibit C: Need*, these communities have been disproportionately burdened by environmental hazards such as flooding, sanitary sewer overflows, natural gas explosions,<sup>36</sup> and sub-standard infrastructure.<sup>37</sup>





The proposed project would address the flooding, heat, and power-outage related environmental injustices as detailed in *Subfactor (b)(iii): Environment and Resilience*.

The project also seeks to address exposure to environmental hazards associated with sub-standard infrastructure, such as substandard natural gas, electricity, sewer, and water infrastructure, through utility coordination where

applicable. Further, by replacing damaged and degraded units erected prior to 1976, the project would inherently address additional environmental hazards such as mold exposure and indoor air pollution from outdated appliances and materials.

In addition to addressing environmental hazards, this project seeks to enrich Fairfax County's diverse communities by preserving existing affordable housing units, and most importantly, prioritizing the dignity of MHC residents by protecting existing community ties and preventing

<sup>&</sup>lt;sup>35</sup> Harmony Place Mobile Home Park Community Survey: Summary of Findings

<sup>&</sup>lt;sup>36</sup> <u>8 displaced in Mount Vernon mobile home fire | wusa9.com</u>

<sup>&</sup>lt;sup>37</sup> Blue Heron Leadership Group. (2021). Harmony Place Mobile Home Park Condition Assessment.

displacement of residents. Fairfax County seeks to ensure quality of life for all residents, neighborhoods, and diverse communities, in alignment with the county's One Fairfax racial and social equity policy.

## iv. Subfactor (b)(iv): Community Engagement (10 points)

On November 21, 2017, the Fairfax County Board of Supervisors published the One Fairfax racial and social equity policy with the goal of considering equity in decision making and, in the development, and delivery of future policies, program, and services. Among the goals of One Fairfax is a commitment to implement housing policies that encourage all who want to live in Fairfax to be able to do so and the provision of a full spectrum of housing opportunities across the county.

At the center of One Fairfax is a commitment to a fully inclusive approach to community engagement. As such, One Fairfax is a fundamental shift from a one-size-fits-all policy formula in favor of an approach that involves setting universal goals, assessing general population performance related to those goals as well as groups and places that are performing differently, understanding what supports and impedes groups from achieving the goals, and using that information to develop and implement targeted strategies. Therefore, the One Fairfax Equity Plan calls for the engagement of people with lived experience to inform proposed activities using a place-based collective impact approach to address the complex, large scale social and environmental issues at scale.

This approach relies on a group of stakeholders committed to addressing a specific social or environmental issue, and the results and implications are discussed together. It includes nonprofit, private, and public sector, and the community. In order to make significant progress it requires systems change, greater alignment and connection between many organizations and community as decision makers. Successfully making progress requires both scaling effective work across organizations as well as identifying new innovative solutions.

In partnership with the Fairfax County Department of Neighborhood and Community Services (NCS) and their network of stakeholders and partners contracted through their Neighborhood Initiative Program (NIP), the FCRHA and the county's Department of Housing and Community Development (HCD) will be implementing and coordinating the Countywide Inclusive Community Engagement framework to galvanize those impacted the most. Working from an equity perspective, NCS will work with external partners, stakeholders, and the business community to build inclusive community engagement capacity to improve service delivery and create equitable outcomes for all manufactured housing residents. By bringing together bring together non-profits, community-based organizations, civic organizations, inter-faith community, and county agencies we will establish the best practices as well as build the capacity of county, community, and stakeholders to engage in inclusive public engagement. It will also evaluate and address barriers (including transportation, language, virtual access, and technology gaps) to cultural, recreational, and social opportunities.

NCS will lead countywide engagement through centralized functions to provide guidance, tools, networks, data analysis and more capacity, coordinate countywide engagement efforts and resources to ensure fair and equal community access across departments, establish place-based engagement efforts, and provide technical assistance to create a geographic and population-focused approach based on each individual MHC needs. Participation will reflect a group of residents, who are representative of the demographics of each manufactured housing

community's geography, race/ethnicity, age, gender, and other demographic characteristics with specific emphasis on those who have historically been most adversely impacted by decisions and those who are most often marginalized in these conversations. This includes people of color, people with low incomes, limited English proficiency, and other traditionally underserved groups.

Engagement will connect residents to opportunities that encourage the development of an inclusive economy within the MHCs. Further, this approach to engagement will:

- Establish and maintain trust with communities in an honest and transparent manner;
- Consider and respect history, culture and trauma;
- Promote and create accessible government through establishing collaborative efforts with the community to ensure public engagement processes are broadly accessible to all residents of manufactured housing communities to promote meaningful participation;
- Enable engaged communications through clear and open communication for meaningful public input, broad community participation, and engagement in the decision-making process; and,
- Place strategic focus on turning vulnerable MHCs into communities of opportunity.

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

Fairfax County's PRICE grant proposal centered around: understanding community needs and preserving and revitalization; assessing and improving infrastructure; development activities; resilience and mitigation activities; housing and voluntary supportive services; and planning and regulatory activities clearly aligns with a wide variety of our existing community plans and policies as described below:

- *Countywide Strategic Plan:* This is the overarching strategic document governing Fairfax County's priorities, and the county's PRICE proposal is consistent with a variety of community outcomes in the Plan. Specifically, the PRICE grant proposal supports:
  - Economic opportunity by promoting economic vibrancy in all communities;
  - Empowerment and support for residents facing vulnerability by ensuring that the residents of MHCs are respected, understood and connected;
  - Environment and energy by promoting land quality and sound environmental policies in the MHCs; and
  - Housing and neighborhood livability by fostering affordable and quality housing and access to amenities that promote healthy neighborhoods.
- *Communitywide Housing Strategic Plan:* This is the guiding document for affordable housing policy in Fairfax County, and it among other things calls for the development of 15,000 net new homes affordable to households earning 60 percent of the Area Median Income (AMI) and below and no net loss of the county's existing affordable housing stock including the MHCs. The county's PRICE grant application which provides for a variety of activities aimed at preserving the affordable housing opportunities that exist in the MHCs is in line with the county's housing goals.
- Affordable Housing Preservation Task Force Report: Fairfax County's Affordable Housing Preservation Task Force made recommendations for the preservation of the county's committed and market-affordable housing. The task force specifically set a goal of preserving the affordability of the approximately 1,750 housing opportunities that exist in MHCs. The task force recognized that MHCs, and owners of manufactured homes in

those communities have unique challenges and opportunities. In so doing, the task force recommended the creation of an MHC-specific work group to make the recommendations which serve as the underpinning of the county's PRICE application.

- *Manufactured Housing Task Force (MHTF) Report:* The MHTF set three goals:
  - Preserve, through a variety of means, the affordability of the approximately 1,750 housing opportunities that exist in the eight MHCs in Fairfax County, recognizing that each community and each family has unique circumstances that will require a tailored approach.
  - Provide MHC residents the opportunity to fully participate in and benefit from civic life in Fairfax County, most critically but not limited to policy decisions that directly impact their housing sustainability.
  - Provide MHC residents with the opportunity to learn about their rights and limitations and provide MHC owners with the opportunity to learn about their responsibilities under the Manufactured Home Lot Rental Act of Virginia and other applicable regulations, county policies and resources available to assist them.
- Metropolitan Washington Council of Governments Regional Fair Housing Plan:
  - Increase awareness of existing and upcoming affordable homeownership and rental opportunities in communities of color and other vulnerable communities
  - Increase community awareness of Fair Housing rights by developing and providing new Fair Housing training and outreach activities.
  - Enforce the Fairfax County Human Rights Ordinance through testing-initiated complaints that identify areas of concern.
  - Increase the accessibility of fair housing services for individuals with disabilities and for whom English is not their first language
  - Adopt amendments to the Fairfax County Comprehensive Plan that provide for tools and incentives for the preservation of both existing market-affordable multifamily units and manufactured housing communities.
- <u>Resilient Fairfax: Climate Adaptation and Resilience Plan</u>: This proposal would contribute to the implementation of several strategies in the county's climate resilience plan, including the following: CRC.2a: Community Aid and Services for Resilience; CRC.2b: Climate Resilience Education and Guidance; CRC.3a: Flood-Risk Reduction Plan; CRC.3b: Heat-Resilient Design, Development, Upgrades, and Practices; CRC.3c: Targeted Tree Plantings; RIB.1b: Flood Resilience of County Government Building and Other Facilities; RIB.2a: Advocate and Partner for Energy Resilience; AE.2a: Green Infrastructure for Resilience; IAP.3b: Federal and State Funding Opportunities for Resilience; IAP.4b: Build County Staff Capacity to Lead on Climate Resilience Planning and Implementation.

## EXHIBIT E: CAPACITY (Maximum 20 points)

Fairfax County government serves the largest jurisdiction in the Commonwealth of Virginia and has a robust array of agencies that have a proven record of managing large-scale public works projects for decades. Specific to the work proposed under the PRICE grant, the Fairfax County Department of Housing and Community Development (HCD) has long experience managing community improvement projects, from CDBG-funded infrastructure improvements in Conservation Areas, to the development and rehabilitation of community centers, to the construction of new affordable housing communities.

Examples of recent, relevant projects managed by HCD and its partner county agencies include:

- *Hybla Valley Community Center:* The county purchased a former indoor tennis club in a part of the county which is largely surrounded by the Harmony Place and Audubon MHCs. Using CDBG and local dollars, the county renovated and converted the facility into a 50,000 square foot community center serving the LMI residents of the area with active recreation and wellness activities, job skills, after-school youth programming, among other services.
- *Murraygate Village Apartments Renovations:* The FCRHA and the county managed the total renovation of this 200-unit affordable apartment complex owned by the FCRHA. Murraygate Village is located adjacent to the Audubon MHC and is home to LMI working families. The FCRHA utilized a combination local and federal dollars along with Low Income Housing Tax Credits (LIHTC). Renovation activities included new windows, kitchens and bathrooms, and converting from a central boiler system to individually metered climate systems. HCD was able to conduct the renovation without having to move residents off-site, thereby reducing the disruption such a large and complex project would have had on their daily lives.
- *FCRHA Headquarters Energy Efficiency Upgrades:* The FCRHA and the county's Office of Environmental and Energy Coordination partnered to make major upgrades to the efficiency of the FCRHA's 1980s-vintage office building. Improvements included the installation of a large rooftop solar array, window tinting, conversion to LED bulbs, and a new HVAC system.

### What is your experience using grant funds?

HCD has successfully administered a variety of HUD grants, including CDBG, HOME and ESG entitlement grants, CDBG-DR and CDBG-CV grants, CoC grants, as well as Section 108 loans. For example, the County has received over \$298 million from CDBG and \$78 million from HOME and expended funding to support numerous county public facility, affordable rental and homeownership housing, public services, fair housing, and rehabilitation activities. Beneficiaries included LMI individuals and households, including older adults, people with disabilities, those experiencing chronic or frequent homelessness, and children. HUD monitored the HOME program in 2018 and CDBG/CDBG-CV programs in 2022 and no findings or concerns were identified. In addition, HCD's partner agencies also have experience using grant funds from a wide variety of other federal agencies, including the US Departments of Transportation; Health and Human Services; and Justice.

### Who are your key staff?

HCD will lead the execution of the manufactured housing preservation activities, which will be kick-started by the PRICE Main Competition funds. Fairfax County has committed a new

Manufactured Housing Coordinator staff position under the Affordable Housing Development Division (AHD) to oversee the program. This position will manage all activities, timelines, and community engagement, and partner with the Grants Management Division (GMD) of HCD to ensure compliance with the PRICE grant requirements. The position will also oversee all interagency coordination with partner organization. Interagency commitments include the departments of Public Works and Environmental Services (DPWES), Planning and Development (DPD), and the Office of Energy and Environmental Coordination (OEEC).

HCD leadership will support the new Manufactured Housing Coordinator position with the programming, decision making, and grants management compliance, as follows:

- Agency Director, Thomas Fleetwood
- Deputy Director, Real Estate Finance and Development, Anna Shapiro
- AHD Director, Meghan Van Dam
- AHD Manufactured Housing Program Coordinator Pending
- Design, Development & Construction Division Director, Mark Buenavista
- GMD Program Manager, Sharon Shields
- GMD Associate Director, Laura Lazo
- Central Services (Finance Division), Division Director, Erin Kozanecki
- One Fairfax, Marwan Mahmoud

As mentioned previously, HCD will partner with NCS who will serve as lead and subject matter experts in community engagement:

- NCS, Deputy Director, Pallas Washington
- NCS, Inclusive Engagement and Community Intervention Division Director, Norma Lopez

DPD will guide HCD and provide subject matter expertise for all planning activities related to Comprehensive Plan and Zoning Ordinance studies and amendments:

- DPD Zoning Administration Division Staff
- DPD Planning Division Staff

OEEC and DPWES will provide subject matter expertise to the environmental and resiliency components of the grant, related to hazard assessments and mitigation efforts:

- DPWES, Stormwater Management, Emergency Management Specialist, Chase Suddith
- OEEC, Planner IV (Resilient Fairfax), Allison Homer.

#### What is your experience promoting racial equity?

In 2023, HCD conducted targeted outreach to residents of naturally occurring and committed affordable rental housing to inform a new Policy seeking to preserve existing affordable units if they undergo redevelopment (the Preservation Policy). The goal of the outreach was to ensure that the populations that may be affected by the Preservation Policy could help formulate and give feedback on it. Residents often face various barriers to participating in the land use process, such as language barriers, location and timing of the meetings, and lack of childcare and/or transportation. Staff from HCD and NCS used data and knowledge of potentially impacted communities to inform the locations of the various meetings. A series of three meetings in areas with concentrations of low- and moderate-income households. The times of the meetings were based on feedback from community members on how this has impacted their ability to participate in the past. Staff arranged childcare, transportation to/from the meetings, and translation services to remove barriers to resident participation.

HCD is also aligned with multiple focus areas of the One Fairfax Policy. One Fairfax aims to ensure that all county policies, programs, and services consider and address the needs of diverse populations, including race, ethnicity, gender, disability, and income level as a commitment to confront systemic inequalities, foster inclusivity and promote fairness across the community. For example, an area of focus of the One Fairfax Policy establishes the goal of achieving "Housing policies that encourage all who want to live in Fairfax to be able to do so, and the provision of a full spectrum of housing opportunities across the county." Another area of focus of the One Fairfax Policy sets the goal of achieving "Neighborhoods that support all communities and individuals through strong social networks, trust among neighbors, and the ability to work together to achieve common goals that improve the quality of life for everyone in the neighborhood." Aligned with both aforementioned focus areas, PRICE grant funding will be used to support comprehensive plan and zoning ordinance amendment activities, especially community engagement activities, to better address the needs of the MHCs and provide access to resources that support housing stability, code compliance and safety.

#### What is your experience completing environmental reviews?

Staff in Fairfax County's Office of Environmental and Energy Coordination (OEEC), HCD, and Department of Planning and Development (DPD) have familiarity in the review of NEPA documents for state and federal projects related to transportation and infrastructure improvements, new capital facilities, housing, and other related development. DPD is the lead agency in conducting these reviews as part of the land use and entitlement process, soliciting comments from several county agencies; comments are primarily related to consistency with the Comprehensive Plan, County Code, State Code, and other Board of Supervisors adopted policies and documents. DPD conducts reviews of Environmental Assessments, Environmental Impact Statements, Environmental Impact Reviews and Coastal Zone Consistency Determinations. HCD conducts reviews in accordance with 24 CFR Part 58 for housing and community facilities receiving federal funding. Additionally, NEPA documents are taken into consideration by staff when making decisions for future planning and infrastructure needs.

### Are you familiar with cross-cutting federal requirements?

Fairfax County Government's Department of Finance administers a countywide grants management policy for all monies received through federal, state, and other private grant sources. This policy outlines the responsibilities of county departments that receive financial assistance and the procedures to be followed to ensure coordinated and efficient administration of all county grants. The policy complies with 2 CFR Part 200 – Uniform Guidance. Fairfax County has also adopted a procurement policy which includes procurement standards for federal grant awards to ensure compliance with 2 CFR Part 200.318 – 327, including adherence to Davis-Bacon labor standards for contractors and subcontractors where applicable.

HCD follows these policies and federal grant requirements relative to the acceptance of federal funds. For example, HCD also complies with environmental review; Build America, Buy America; affirmatively further fair housing; anti-displacement and relocation assistance; anti-lobbying; anti-discrimination; and lead-based paint requirements that are mandatory for CDBG and/or HOME activities. HCD also participates in the county's annual single audit process for federal funds.

#### EXHIBIT F: MATCH OR LEVERAGE (Maximum 5 points)

Fairfax County will leverage at least approximately \$8.5 million of local, federal, and other sources of funding for activities described throughout this application over the period of performance.

As mentioned in *Exhibit D. Subfactor (b)(i): Project Description, Management, and Impact*, Fairfax County Department of Housing and Community Development (HCD) and Fairfax County Redevelopment and Housing Authority (FCRHA) seeks to establish a grant home rehabilitation and improvement program to be piloted at the Harmony Place and then expanded to other MHCs. The grant program is annually identified in the Action Plan for the county's CDBG program beginning in FY 2023.<sup>38</sup> The current balance of funding for this program is \$491,064 with an annual planned allocation of \$240,000 of CDBG funds. These funds would provide additional program funding leverage of \$1,931,064 during the PRICE grant period of performance. The annual allocation of \$240,000 between FY 2025 and FY 2030 is dependent upon HUD CDBG grant awards equal to the FY2024 award. Reductions in the annual award could cause the leverage funding to be adjusted based on the CDBG award amount and other program requirements.

Fairfax County will also leverage 3,750,000 million in Amazon IMPACT Reach funds to support the proposed financial resources for homebuyers in MHCs to acquire a home for the first time, also described in *Exhibit D. Subfactor* (*b*)(*i*). Uses for this funding may include such supports as compensation/repurchase of units, relocation assistance, down payment assistance, and providing homebuyer and homeowner education.

Fairfax County will also leverage funding for the Neighborhood Initiative Program (NIP) and Opportunity Neighborhood (ON) programming to implement and coordinate the Countywide Inclusive Community Engagement framework to improve service delivery and create equitable outcomes for all manufactured housing residents. The program brings togethers non-profits, community-based organizations, civic organizations, inter-faith community, and county agencies to establish best practices; builds capacity of county, community, and stakeholders to engage in inclusive public engagement; and evaluates and addresses barriers (including transportation, language, virtual access, and technology gaps) to cultural, recreational, and social opportunities. In total NIP and ON programs would leverage approximately \$2,794,500 of funding.

<sup>38</sup> Proposed One-Year Action Plan for County FY2024 (Federal FY2023): fairfaxcounty.gov/housing/sites/housing/files/Assets/Documents/Consolidated Plan/FY2024One-Year-Action-Plan.pdf

#### Exhibit G: LONG-TERM EFFECT (Maximum 10 points).

Long-term affordability is the goal of any preservation effort undertaken by Fairfax County. For properties that will continue to operate as rental housing, Fairfax County will seek affordability periods that exceed 30 years, with a strong preference for the longest term possible. In the process of providing long-term loans for preservation, the FCRHA seeks the best possible terms to extend affordability beyond what is documented through Rights of First Refusal, ground leases, and other means. While affordability periods are the primary means of obtaining long-term affordability, these other mechanisms serve as back up to ensure that the FCRHA is well-positioned to create longer-term affordability when possible. Long-term affordability commitments and restrictions provide residents with stable pricing that is not subject to the same price increases as market rate rental homes. Robust engagement with residents will assist the FCRHA in determining the appropriate rent levels for residents on a property that receives funding.

Homeownership opportunities will be assessed and sought out through various means. PRICE grant funding will result in Fairfax County being able to assist residents in potential homeownership opportunities that arise, as these tend to arise quickly and require funding on-hand to execute. In a strong housing market like Fairfax County, it is essential to have ample funding available to respond to these opportunities in a timely manner and compete with investors seeking profits through increased rents and/or redevelopment of MHCs. Creative homeownership options will be explored, including potentially Community Land Trusts. The PRICE grant would enable Fairfax County to provide funding to residents who wish to own the land under their home when an opportunity arises to do so, thereby ensuring self-governance of the property and long-term affordability.

Fairfax County is not only committed to preserving the affordability of properties but also to improving living conditions through careful consideration of the physical conditions of a property and the needs of residents. Assessing the needs of MHCs will require robust coordination with residents to inspect the Manufactured Homes, discuss priority concerns with residents, and allocate resources in an equitable and efficient manner. PRICE grant funding will assist Fairfax County in reaching and helping a greater number of MHC residents than would otherwise be possible. By providing funding for physical improvements or home replacements, as needed, the county will be able to improve a greater number of lives through improved living conditions. The quality of one's home not only affects physical safety but also may have consequential impacts on mental health and well-being. Substandard housing can harm children's development and contribute to psychological distress.

MHCs are vulnerable to storms that are increasing in intensity and frequency over time, which are not only physically damaging to structure but can be a major source of stress for residents. Infrastructure improvements detailed in Exhibit D will assist with improving resilience related to flooding, wind and power outages, and extreme heat. Improving the resilience and safety of the MHCs will help protect residents' homes, reduce the financial need for them to fix their homes after it sustains damage, and can provide a greater sense of safety and stability. Aging structures may also be currently exposing residents to mold and other indoor air pollution from outdated appliances and materials. These conditions can lead to a variety of short- and long-term health effects. Units constructed prior to 1976 may need to be replaced in order to provide the greatest benefit to residents. This would improve the physical health of residents and reduce the stress that is associated with substandard and unhealthy living conditions.

Long-term, stable affordability for the MHCs through long-term restrictions and/or homeownership opportunities, coupled with physical improvements or replacement of degraded units, will improve the financial sustainability of the MHCs. PRICE grant funding will assist Fairfax County in making large investments upfront to improve the physical and financial health of the MHCs, reducing the need for further federal assistance. Fairfax County is in a strongly desirable location, reflected in the strength of the housing market. As noted in this application, MHCs in Fairfax County have been sold to investors, which may lead to substantial increases in pad rents and other fees for the residents. Financially stable communities and residents are less likely to require future federal assistance. Affordability levels that are subject to unstable and inconsistent market rate increases may increase the need for resident reliance on other federal assistance programs. Improving the resilience of the homes to storms will provide an improvement to the lives of the residents and also reduces the likelihood of disastrous effects on neighborhoods which might require federal assistance to resolve.

MHCs have historically provided affordable housing for those who might be priced out of other areas of Fairfax County as rents and property values continue to rise and wages stay relatively stagnant. Fairfax County's MHCs are located in areas with disproportionate socioeconomic vulnerabilities, and Census data shows that socioeconomic vulnerabilities are greatest among Black/African Americans and Hispanic populations. The PRICE grant funding will assist vulnerable populations by seeking to stabilize rents, promote homeownership, and provide much needed repairs to homes. These measures will help bolster the financial, physical and mental health of underserved residents who have historically not been able to reap the benefits of Fairfax County's economic success. As Fairfax County has attracted new residents, businesses, and developments, affordability has decreased and left many in dire financial situations. Many vulnerable populations have also historically been left out of public engagement with county leadership and staff as they face more barriers to participation than many of the residents who are typically involved. Robust and thoughtful community engagement with the residents of MHCs will help bring them into the fold and start important conversations regarding their needs as residents and those of their communities. The PRICE grant will enable Fairfax County to invest in the MHCs to promote long-term affordability, homeownership, and resilience among populations that have historically been underserved.

#### **Required Attachments**

Note: Attachments do not count towards the application page limit

#### Attachment A. Advancing Racial Equity

In 2017, Fairfax County entered a Memorandum of Understanding with seven neighboring jurisdictions to develop a Regional Analysis of Impediments (RAI). When completed, the RAI will be a five-year plan that includes goals and actions to help reverse patterns of segregation and increase access to neighborhoods of opportunity throughout the greater Washington, D.C. area. The RAI marks the first time in 25 years that local jurisdictions collaborated to create a joint plan for the region. As part of the RAI, comprehensive analyses were conducted that describe the living patterns of Fairfax County households by race and ethnicity. While the data reflects the broader community, it is inclusive of families that would be expected to benefit from mobility-related services as part of this grant funding.

**Potential barriers** to persons or communities of color. Findings from analyses conducted as part of the RAI indicate that although Fairfax County households have substantial access to low poverty areas overall, racial and ethnic disparities exist. In general, White households live in neighborhoods with lower poverty rates, while Hispanic and Black households live in higher poverty areas. Similar disproportional findings indicate that White households are more likely to live in environmentally healthy neighborhoods as compared to other races. In addition, data indicate that Hispanic and Black households are more than twice as likely to be severely cost burdened than are White households in Fairfax County. As the analyses conducted as part of the RAI are extensive, these findings and others will be used to guide efforts pertaining to housing mobility,

**Steps to prevent, reduce or eliminate these barriers.** As part of One Fairfax (described in Narrative E\_HUD-52515\_VA019), the Fairfax County Department of Housing and Community Development (HCD) has adopted an equity impact plan. This plan identifies agency goals and strategies to advance equity including improving affordable housing policies and administrative practices; preserving existing affordable housing; aggressively producing housing; and ensuring equitable access to a range of affordable rental and homeownership opportunities. As related to housing mobility, the FCRHA will use vouchers to increase affordable housing choices for people of color in high opportunity areas of the county. This will primarily be accomplished through the implementation of submarket payment standards in the Housing Choice Voucher (HCV) program.

#### **Attachment B. Affirmative Marketing**

Affirmative marketing. Fairfax County is rich in diversity, requiring marketing that connects to target audiences in their culture. The FCRHA will affirmatively market mobility services provided through this grant by combining consumer market data (demographics, lifestyles,3 Narrative K\_HUD-52515\_VA019 media patterns) with community input to determine the messages and media opportunities that will connect with the target audience. The FCRHA will market the mobility program utilizing: (1) owned media assets which include a website and Facebook account; (2) owned media of the broader Fairfax County government system which includes approximately 50 social media accounts owned by various local government agencies; owned Spanish-language assets; production teams from Fairfax Channel 16 to create social media videos and other culturally competent videos; and county-owned signage opportunities; and (3) outreach workers at the Fairfax County Department of Neighborhood and Community Services and Health Department who are trusted community members connected to prominent local influencers including faith leaders, community members and others.

FCRHA staff will work with the outreach workers in these agencies to connect with people who might not be otherwise reached by typical media strategies. The corps of outreach workers will receive a toolkit of materials, developed by the FCRHA, to share with local influencers and help them promote the program in their own community work. The toolkit might include materials to share on WhatsApp, WeChat and other text groups; mini articles for community or faith-based community newsletters, bulletins or websites; and social media posts. The FCRHA will also work with outreach workers to identify community leaders who would be able to interview with media, providing the 'trusted' third party voice.

The highest priority of Housing and Community Development (HCD) in partnership with Fairfax County Department of Neighborhood and Community Services (NCS) will be to expand opportunity and access to manufactured housing to existing and potential new residents beyond the neighborhoods dominated by their own race or ethnicity. Based on the county's demographic profile and vulnerability index the goal of affirmative marketing will be to make African Americans aware that manufactured housing is available to them throughout Fairfax County. We will make Asians and Hispanics aware that manufactured housing is available to them outside enclaves in which concentrations have developed. As well as expand the manufactured housing choices of Caucasians to include racially integrated neighborhoods.

In coordination with the Office of Human Rights and Equity Programs (OHREP) HCD and NCS staff will work with producers at Channel 16, the county's local TV station, to produce a video for viewership by county residents. The focus of the campaign is to highlight various manufactured housing neighborhoods and amenities offered in the county, introducing viewers to and encouraging viewers to visit those areas, and in the process providing them with a wider range of housing options and neighborhoods to consider when seeking housing.

Expanding where people look for housing requires an ongoing, long-term publicity campaign to make everybody aware that they can move anywhere in Fairfax County. Such a campaign to expand housing choices can include the use of local newspaper stories, display ads, radio and television public service announcements, social media, the internet, community centers, human services building, and the websites of Fairfax County. The idea is to change the mindset to consider manufactured housing throughout Fairfax County, rather than limiting their search.

#### Attachment C. Affirmatively Furthering Fair Housing

Affirmatively Furthering Fair Housing (AFFH). As previously noted, Fairfax County is participating in the development of a Regional Analysis of Impediments. This coordinated and systematic regional approach is critical as barriers to fair housing do not follow strict jurisdictional boundaries and residents are mobile throughout the region. The plan currently includes goals and strategies specific to Fairfax County as well as to those of the Washington, D.C. region. The plan is anticipated to be submitted to HUD toward the latter part of 2023, and once finalized, will be one of the few regional plans in the nation to affirmatively further fair housing. The RAI directly aligns with the One Fairfax policy and was built on robust community participation to identify meaningful goals and strategies.

Importantly, the regional goals as well as Fairfax County specific goals identified in the RAI support housing mobility and ensure that all households, regardless of race or ethnicity, have access to high opportunity neighborhoods. One of the key regional strategies is to expand locally funded housing voucher programs, increase the scale and scope of housing mobility programs, and improve the portability of vouchers across jurisdictions. Another key strategy identified in the RAI is to encourage landlords to reduce, eliminate, or offset application fees for voucher users and follow HUD's guidance on the use of criminal backgrounds in screening tenants, to further promote housing mobility.

Fairfax County has also adopted eight goals specific to the county to further address the barriers outlined in the fair housing plan. The local goals are aligned with and supplementary to the regional goals. In addition, they were established based on community feedback, and developed collaboratively with other Fairfax County departments and the community. The Fairfax County goals include adopting tiered, submarket payment standards to align with market rents and increase access to higher opportunity areas for voucher holders. This is the same goal as outlined in the One Fairfax plan for HCD and outlined in the FCRHA's MTW Plan. Progress made on the regional goals as well as Fairfax County local goals will be annually reported to the Fairfax County Office of the County Executive, One Fairfax team, and outlined in the county's One Fairfax plan.

**Strategic Plan Alignment:** If awarded, this grant would directly support and help to advance housing justice by specifically offering support services to families in higher poverty areas of the county. Importantly, the grant aligns with the FCRHA's strategies to advance equity under the One Fairfax policy as well as the goals articulated in the RAI. Along with providing a greater level of support to MFH families, the work of this grant will also help foster stronger relationships with MHC owners and property managers in Fairfax County. This will be of tremendous value in reducing barriers to fair housing, ensuring greater diversity in all areas of the county, and creating new rental opportunities for low-income households.

A new report, written by Virginia Commonwealth University, notes that in Northern Virginia, chances of living to age 75 depend on where you live, race and ethnicity.4 Recognizing that housing is fundamental to health, this grant opportunity will allow the FCRHA to provide the individualized resources that families need to move to opportunity areas that typically have more resources such as fresh groceries, walkable neighborhoods, parks, and more - all of which can influence health outcomes. In addition to aligning with HUD's strategic goal, the proposed use of this grant funding strongly aligns with local public health goals including the Fairfax County Community Health Improvement Plan and the Fairfax County Countywide Strategic Plan.

#### **Attachment D: Eligible Applicants documentation**

- 1. **Resolution of Civil Rights Matters**: The Fairfax County Department of Housing and Community Development has no unresolved civil rights issues pending. See memorandum from Fairfax County Office of Human Rights and Equity, dated June 3, 2024 on following page (Attachment D-1).
- 2. **Timely Submission of Applications**: The Fairfax County Department of Housing and Community Development is submitting the application by the July 10, 2024, 11:59PM deadline.
- 3. Eligible Applicant: The Fairfax County Department of Housing and Community Development (HCD) is an eligible applicant as 01 (County governments). HCD is the agency of the Fairfax County Government which administrates the county's affordable housing development, preservation, and resident assistance programs reporting to the Fairfax County Board of Supervisors and County Executive.
- 4. **Number of Applications:** Fairfax County Department of Housing and Community Development is submitting only one application under the PRICE Main category.

Attachment D-1



# County of Fairfax, Virginia

## MEMORANDUM

DATE: June 3, 2024

 TO:
 Sharon J. Shields

 Program Manager, Grants Management Division
 Fairfax County Department of Housing and Community Development

- FROM: Michael L. Simms/// Director Office of Human Rights and Equity Programs
- SUBJECT: Confirmation No Unresolved Human Rights Issues

To Whom It May Concern,

Please accept this letter as confirmation that the Fairfax County Department of Housing and Community Development has no unresolved civil rights issues pending.

Should you have any questions, please contact me, or Amanda Schlener, Fair Housing Manager, at (703) 324-2953.

Sincerely,

Mhe 1. 1=

Michael L. Simms Director

#### **Attachment E: Evidence of Partnership letters**

DocuSign Envelope ID: D22886BD-0D3E-4458-BD1A-E33CBAC6006B



#### FAIRFAX COUNTY REDEVELOPMENT AND HOUSING AUTHORITY

3700 Pender Drive, Suite 300 Fairfax, Virginia 22030-7444

Telephone: (703) 246-5000 Fax: (703) 653-7130

TTY: 711

V I R G I N I A

June 4, 2024

Re: Intent to Participate

This letter is to confirm the mutual intent of both the Fairfax County Department of Housing and Community Development (HCD) to collaborate and enter into a partner agreement with the Fairfax County Redevelopment and Housing Authority (FCRHA) contingent upon the award of funds from the United States Department of Housing and Urban Development for the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) competition, to carry out eligible activities as provided in the Fairfax County HCD PRICE application.

The Fairfax County Redevelopment and Housing Authority (FCRHA) is a separate political body from Fairfax County Government and possesses specific powers granted by state law. The authority of the FCRHA is vested in 11 commissioners appointed by the Fairfax County Board of Supervisors – one representative from each supervisor district and two at-large representatives. The mission of the FCRHA is to initiate and provide opportunities for Fairfax County residents to live in safe, affordable housing and to help develop, preserve, and revitalize communities through fiscally responsible and open processes. The FCRHA Strategic Plan for FY 2025 details the major activities and projects, as well as anticipated outcomes in the following areas:

- (1) affordable housing development, preservation, and sustainability.
- (2) homeownership services.
- (3) affordable rental housing, property management, and maintenance.
- (4) tenant subsidies and resident services; and
- (5) program planning, development, and management.

These strategic areas support the mission and values of the FCRHA and that of the Fairfax County Department of Housing and Community Development, which serves as staff to the FCRHA.

If awarded the PRICE Main grant, the FCRHA would partner with HCD on such activities as the home improvement and replacement grant and loan programs, as well as respond quickly to opportunities for land acquisition and property purchase, described in the application. The FCRHA under state-granted authority has the ability to purchase property, make loans, and allocate grant funding, typically attached to commitments of affordability. HCD administers and

monitors these activities, once approved by the FCRHA, and reports back to the FCRHA on progress toward goals.

It is understood that this is letter is only an expression of our intent and a binding partner agreement [or other agreement] detailing the terms and conditions of the proposed partnership must be executed before the use of any CDBG-PRICE funds, if awarded.

-DocuSigned by:

LENORE STANTON

06/06/2024 | 07:33:52 EDT

Lenore Stanton, Chairman, Sully District Fairfax County Redevelopment and Housing Authority Additional Attachments (To be added with final submission)

**Attachment F: Match or leverage documentation** 

**Attachment G: Application Certifications and Standard forms** 

Attachment H: Summary of comments received on published Application and list of commenters by name/organization