

**HUD PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY
ENHANCEMENT (PRICE) COMPETITION**

**FR-6700-N-99 APPLICATION FROM THE SOUTH CAROLINA OFFICE OF
RESILIENCE (SCOR)**

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Exhibit A: EXECUTIVE SUMMARY

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

South Carolina Office of Resilience (SCOR)

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The South Carolina Office of Resilience (SCOR) is pleased to submit this application under the HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) competition. SCOR is requesting \$20,000,000.00 in PRICE Main funding to implement the “SC Pee Dee MHU Community Revitalization Program” to revitalize manufactured housing and manufactured housing communities (MHCs) in four SC counties wherein the most CDBG-DR eligible, unserved citizens reside.

Mobile homes, or manufactured housing, are part of the housing fabric of South Carolina. Their affordability and ease of general maintenance provides housing independence and housing choice to residents across the state. According to the 2019 South Carolina Housing Needs Assessment, one in six housing units (16.6 percent) in the state is a manufactured home, which is more than 250 percent of the national figure of 6.3 percent. ([2019 SC Housing Needs Assessment](#)). Approximately one-fifth of currently occupied MHUs in the US were built before 1980 and these older units are likely to be smaller, less safe, and have fewer amenities and less investment potential than newer manufactured homes ([NLIHC, 2016](#)). Socially vulnerable citizens typically don’t have the resources to make extensive repairs or to replace their older or damaged MHUs. Replacing older, inefficient MHUs in failing states of repair affords citizens more resiliency to extreme weather, natural hazards, and disaster events.

SCOR exists to increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. SCOR currently manages the disbursement of HUD Community Development Block Grant Disaster Recovery (CDBG-DR) funds to provide long-term housing recovery assistance to South Carolinians whose homes are damaged by the federally declared disasters. If awarded, SCOR will utilize funding to replace manufactured housing units (MHUs) which are aging and in a state of extreme disrepair for low- and moderate-income (LMI) MHU residents in Georgetown, Horry, Marion, and Williamsburg counties where over 50% of the CDBG-DR program eligible yet unserved (due to funding limitations) MHU households reside. SCOR will braid the best practices gained from the effective implementation of the SC CDBG-DR programs with the goals of the HUD PRICE program to serve low- and moderate-income manufactured housing residents and manufactured housing communities.

The proposed grant project is informed by the SCOR developed [South Carolina Strategic Statewide Resilience and Risk Reduction Plan \(SSRRRP\)](#). In alignment with the SSRRRP's recommendations for incorporating resilience into housing recovery, SCOR seeks to only replace MHUs which sit on rented or leased land ([SSRRRP, pg. 517-518](#)).

SCOR has reviewed and identified the following for this grant proposal:

Need

- There were many MHU residents from SCOR's three CDGB-DR programs who, while eligible, were not served due to funding limitations. 1,359 MHU residents were eligible, yet unserved.
- Of those 1,359 eligible yet unserved, 760 were from four SC counties: Georgetown, Horry, Marion, and Williamsburg. Of the 760 above, 549 have their MHUs placed on rented or leased land.
- The average age of the MHUs in these four counties is 37 years. Older MHUs are less energy efficient and less resilient to extreme weather, natural hazards, and disaster events.
- These four aforesaid counties and their MHUs are vulnerable to future hurricanes. Additionally, the four counties each meet the Distress Criteria as defined in 12 CFR 1805.201(b)(3)(ii)(D) (Certification as a Community Development Financial Institution.
- Relocating MHUs out the FEMA floodplain and other identified flood prone areas makes citizens more resilient to extreme weather events.
- Lack of financial means is a barrier to MHU preservation.

Soundness of Approach

- SCOR's proposed approach to revitalize manufactured housing and manufactured housing communities (MHC) is to replace at least 90 MHUs, on rented land, for only LMI households.
- SCOR will replace MHUs in counties using proven methods from its CDBG-DR programs.
- The grant will be completed and closed before the end of the period of performance.
- The budget is attached separately and details funding categories.

- Replacing a MHU resident's home with a more resilient, more energy efficient MHU with an electric heat pump will allow the MHU households to spend less of their gross income on costly home repairs and paying higher energy bills and provide them with the opportunity to build financial security and wealth. Focusing on land renters will afford SCOR the opportunity to work with residents of manufactured housing, MHCs and landowners to promote long-term leases, rent-to-own agreements, or outright purchase of the land, where possible.
- This project will support accessible, affordable opportunities for disabled individuals by providing options for handicap ramps, wider doorways, handicap accessible bathrooms, walk-in showers, and other options.
- SCOR tracks and reports Section 3 data. Economic opportunities are promoted for low- and moderate-income (LMI) individuals via SCOR contractors and subcontractors. SCOR encourages its vendors to hire local, LMI workers.
- Flooding is a very real and significant hazard in South Carolina. Moving MHUs out of harm's way mitigates this hazard substantially.
- This project will support LMI households in need of affordable, resilient housing by providing suitable land outside of the FEMA floodplain and other identified flood prone areas for them to live.
- SCOR will ensure all MHU replacements will be outside of the FEMA floodplain and other flood prone areas.
- SCOR will utilize other data sources available to assess flood risk not captured by the FEMA Flood Insurance Rate Maps (FIRMs).
- SCOR engages regularly with the communities of South Carolina through its quarterly Stakeholders Meeting, other local public hearings, town halls, and guest speaking engagements.

Capacity

- SCOR has experience replacing MHUs through its three CDBG-DR programs (\$293M). To date 1,398 have been replaced and 391 have been repaired.
- SCOR has experience with infrastructure, buyouts, plans and studies, and match projects through its HUD CDBG-MIT grant (\$162M).

- SCOR has experience managing grants, reporting within the HUD Disaster Recovery Grant Reporting (DRGR) system, closing grants (2015 Flood), and with HUD monitoring and technical assistance visits. There have been no findings issued by HUD after performing monitoring of SCOR's HUD programs.
- The demographic data of SCOR's three CDBG-DR housing programs demonstrates SCOR's commitment to affirmatively furthering fair housing and advancing racial equity. During the application phase, SCOR researched prospective candidates for the proposed PRICE Main Project. The candidates' demographic data for prospective candidates the proposed program demonstrates that this commitment will be maintained through SCOR's PRICE Main program.
- SCOR has extensive experience conducting and managing HUD environmental reviews.
- As experienced HUD CDBG-DR and CDBG-MIT grantees, SCOR will comply with 2 CFR part 200 and all labor applicable labor standards.

Leverage

- SCOR partnered with the South Carolina State Housing Finance and Development Authority (SC Housing) for each of SCOR's three CDBG-DR housing recovery programs. SC Housing provided a total of \$11,320,000.00 to bolster the housing recovery programs, allowing an additional 126 construction projects that would not have otherwise been completed.

Long-Term Effect

- This project provides a long-lasting asset, with lower maintenance costs and better energy efficiency.
- This project will encourage affordable leases for land and land ownership.
- The 3-year forgivable lien will encourage manufactured housing residents to remain in their newly replaced manufactured homes.

**Exhibit B: THRESHOLD REQUIREMENTS AND OTHER SUBMISSION
REQUIREMENTS**

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Threshold Eligibility Requirements

N/A

Other Submission Requirements

1. Standard Application, Assurances, Certifications and Disclosures

Code of Conduct

SCOR will provide the most recent version of their Code of Conduct to be submitted to the HUD program contact for this NOFO and submitted with this application. The submitted Code of Conduct complies with the requirements included in the “Conducting Business in Accordance with Ethical Standards” section of the Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards, as well as any program-specific requirements. These requirements include ethical standards related to conflicts of interest for procurements in 2 CFR 200.318(c) and 2 CFR 200.317, as well as HUD-specific conflict of interest standards.

Exhibit C: NEED

HUD PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY
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Mobile homes, or manufactured housing, are part of the housing fabric of South Carolina. Their affordability and ease of general maintenance provides housing independence and housing choice to residents across the state. According to the 2019 South Carolina Housing Needs Assessment, one in six housing units (16.6 percent) in the state is a manufactured home, which is more than 250 percent of the national figure of 6.3 percent. Furthermore, the number of manufactured homes in rural counties nearly equals that of conventionally constructed single-family homes ([2019 SC Housing Needs Assessment](#)). The National Low Income Housing Coalition (NLIHC) estimates that approximately one-fifth of currently occupied MHUs in the US were built before 1980 and these older units are likely to be smaller, less safe, and have fewer amenities and less investment potential than newer manufactured homes ([NLIHC, 2016](#)). Socially vulnerable citizens typically don't have the resources to make extensive repairs or to replace their older or damaged MHUs. In addition, when considering whether a structure is repairable, the cost of making those repairs may be disproportionately high when considering the overall value of the structure. Replacing older, inefficient MHUs in failing states of repair affords citizens more resiliency to extreme weather, natural hazards, and disaster events, and revitalizes manufactured home communities (MHCs).

Following the historic floods of 2015 resulting from Hurricane Joaquin, the South Carolina Disaster Recovery Office (SCDRO) oversaw the disbursement of HUD Community Development Block Grant Disaster Recovery (CDBG-DR) funds to provide long-term housing recovery assistance to South Carolinians whose homes were damaged by the federally declared disaster. Subsequent federally declared disasters, Hurricane Matthew in 2016 and Hurricane Florence in 2018, and the resulting need to administer CDBG-DR funds to aid citizens from impacts from those disasters led, in part, to the creation of the South Carolina Office of Resilience (SCOR) with SCOR absorbing the former SCDRO.

The Disaster Relief and Resilience Act ([S.C. Code Ann. § 48-62-30 et seq.](#)), passed in 2020, transferred the SCDRO into SCOR and directed the agency to develop, implement, and maintain the [Strategic Statewide Resilience and Risk Reduction Plan](#) (SSRRRP). The SSRRRP is intended to serve as a framework to guide state investment in flood mitigation projects and the adoption of programs and policies to protect the people and property of South Carolina from the damage and destruction of extreme weather events. Though SCDRO was absorbed into SCOR, the goals of the SC CDBG-DR program did not change: to provide housing solutions for low- and moderate-

income (LMI), disaster-affected citizens located within the HUD identified most impacted and distressed (MID) and non-most impacted and distressed (NMID) counties designated within the Federal Register.

Across the three CDBG-DR programs, over 10,000 South Carolinians applied for assistance for their storm-damaged homes; almost half of these applicants were manufactured housing unit (MHU) residents. To date, SCOR has assisted 1,789 LMI MHU residents with the rehabilitation or replacement of their homes. Yet there are over 1,350 eligible MHU residents, all LMI, across twenty-seven counties who could not be served by the SCOR CDBG-DR programs due to funding limitations. Another 1,300 citizens applied but were not deemed eligible at the time or did not complete the application process. A number of these 1,300 persons could now be eligible due to changing income after the 2020 pandemic.

SCOR envisions a South Carolina where the risk of adverse impacts from extreme weather events are significantly reduced, empowering citizens and communities to withstand and recover from disasters. SCOR works to achieve this vision by planning and coordinating statewide resilience, long term recovery and hazard mitigation. The HUD PRICE Main funding opportunity would allow SCOR to braid the best practices gained from the effective implementation of the SC CDBG-DR programs with the goals of the HUD PRICE program to serve low- and moderate-income manufactured housing residents and manufactured housing communities.

SCOR is pleased to present the “SC Pee Dee MHU Community Revitalization Program” grant application under the HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) competition. SCOR is requesting \$20,000,000.00 in PRICE Main funding to implement the proposed project. The SC Pee Dee MHU Community Revitalization Program will work to revitalize the manufactured housing and manufactured housing communities of Georgetown, Horry, Marion, and Williamsburg counties—the four counties where over 50% of the CDBG-DR eligible yet unserved (due to funding limitations) MHU households reside. If awarded, PRICE Main funding will be utilized to replace MHUs which are aging and in a state of extreme disrepair for MHU residents who do not own the land on which there MHUs sit. In alignment with the SSRRRP’s recommendations for incorporating resilience into housing recovery, SCOR seeks to only replace MHUs which sit on rented or leased land. Any future SCOR implemented CDBG-

DR housing programs would also adhere to this recommendation, with MHUs on owned land being replaced with stick-built homes, as this provides for a more resilient solution for citizens ([SSRRRP, pg. 517-518](#)).

Project Area

The U.S. Department of Agriculture’s Rural-Urban Continuum Codes (RUCC) distinguish U.S. Metropolitan (metro) counties by population size of their metro area (1-3), and the nonmetropolitan (nonmetro) counties by their degree of urbanization and adjacency to a metro area (4-9). **Table 1** shows each the four counties’ total population, 2023 RUCC, and description. Based on each county’s RUCC, Georgetown, Marion, and Williamsburg counties are largely rural, and Horry County is considered urban.

Table 1: Project Area - Metropolitan or Non-Metropolitan Determination (by County)

County	Population* (2020)	USDA Rural Urban Continuum Code	Description (metro or non-metro)**
Georgetown	63,404	4	Nonmetro - Urban population of 20,000 or more, adjacent to a metro area
Horry	351,029	2	Metro - Counties in metro areas of 250,000 to 1 million population
Marion	29,183	6	Nonmetro - Urban population of 5,000 to 20,000, adjacent to a metro area
Williamsburg	31,026	6	Nonmetro - Urban population of 5,000 to 20,000, adjacent to a metro area

Source: [USDA, Economic Research Service, Rural-Urban Continuum Codes data product, updated January 2024.](#)

*Population totals from the 2020 Census Demographic and Housing Characteristics File.

**Metropolitan areas are based on the Office of Management and Budget (OMB) delineation as of July 2023.

Based on the U.S. Census Bureau’s 2023 Population estimates, Marion and Williamsburg counties are both considered majority-minority counties, as their population is comprised of less than 50% non-Hispanic whites. Black or African Americans (non-Hispanic or Latino) citizens make up 56.2% and 62.9%, respectively. **Table 2** shows the racial demographics of the proposed four-county project area.

Table 2: Race and Hispanic Origin of the Proposed Project Area (by County)

County	White (not Hispanic or Latino)	Black or African American (not Hispanic or Latino)	American Indian & Alaska Native (alone)	Asian (alone)	Native Hawaiian and Other Pacific Islander (alone)	Hispanic or Latino	Two or More Races
Georgetown	66.7%	28.6%	0.4%	0.7%	0.1%	3.3%	1.1%
Horry	77.7%	12.3%	0.6%	1.5%	0.1%	6.5%	2.3%
Marion	38.0%	56.2%	0.9%	0.7%	Z*	3.6%	2.0%
Williamsburg	32.4%	62.9%	0.6%	0.8%	Z*	3.1%	1.2%

Source: [U.S. Census Bureau Quick Facts, Population estimates, July 1, 2023.](#)

*Value greater than zero but less than half unit of measure shown.

For the SC Pee Dee MHU Community Revitalization Program SCOR proposes to revitalize manufactured housing and manufactured housing communities in Georgetown, Horry, Marion, and Williamsburg counties. According to the United State Census Bureau’s American Community Survey (ACS), there are 43,743 manufactured housing units (MHUs) in the proposed four-county project area (ACS Estimates, 2022).

Table 3: Housing Types of Project Area (by County)

County	Total Housing Units (2022)	Single Family Detached Units	Single Family Attached Units	Multi-family (2 or More Units)*	Total All Attached & Multi-Family Units	Boat, RV, van, etc.	Mobile Home Trailer/ Other**
Georgetown	36,219	21,958	2,210	5,408	7,618	10	6,633
Horry	217,310	117,952	9,802	63,795	73,597	49	25,712
Marion	14,340	7,915	28	1,227	1,255	45	5,125
Williamsburg	14,801	7,485	49	952	1,001	42	6,273

Source: [2022 American Community Survey \(ACS\) 1-Year Estimates](#)

*According to the ACS, the total provided refers to the number of buildings as opposed to the number of units.

**ACS refers to manufactured housing is as ‘mobile home trailer/other.’

Table 3 details the housing types across the four counties. Horry County has the highest number of MHUs (25,712) in the project area; however, the county has the lowest percentage of MHUs versus other housing types, with manufactured housing representing 11.8% of the housing stock in the county. Williamsburg County has the highest percentage of MHUs in the project area with manufactured housing representing 42.4% of the total number of housing units. More than a third (35.7%) of the housing units in Marion County are manufactured housing while nearly one-fifth

of the housing units in Georgetown County are MHUs (18.3%). All in all, MHUs comprise approximately 15.5% of the total housing units across the project area. (ACS Estimates, 2022).

As mentioned earlier, SCOR has assisted 1,789 low- and moderate-income (LMI) MHU residents across South Carolina with the rehabilitation or replacement of their homes through its CDBG-DR program (2015 Severe Storm, Hurricane Matthew, and Hurricane Florence). However, due to funding limitations, there were over 1,350 eligible MHU residents, all LMI, across twenty-seven disaster impacted counties who could not be served by the program. 760 (56%) of the LMI unserved MHU population reside in the proposed four-county project area. **Figure 1** highlights counties affected by at least two disasters (19) and depicts the eligible (low- and moderate-income) MHU residents residing in these Individual Assistance (IA) counties who were unserved by the SCOR CDBG-DR programs due to funding limitations. Of the four-county project area, Horry, Marion, and Georgetown counties were designated IA counties for all three disasters and Williamsburg County was designated an IA county for the 2015 Severe Storm and Hurricane Matthew (2016).

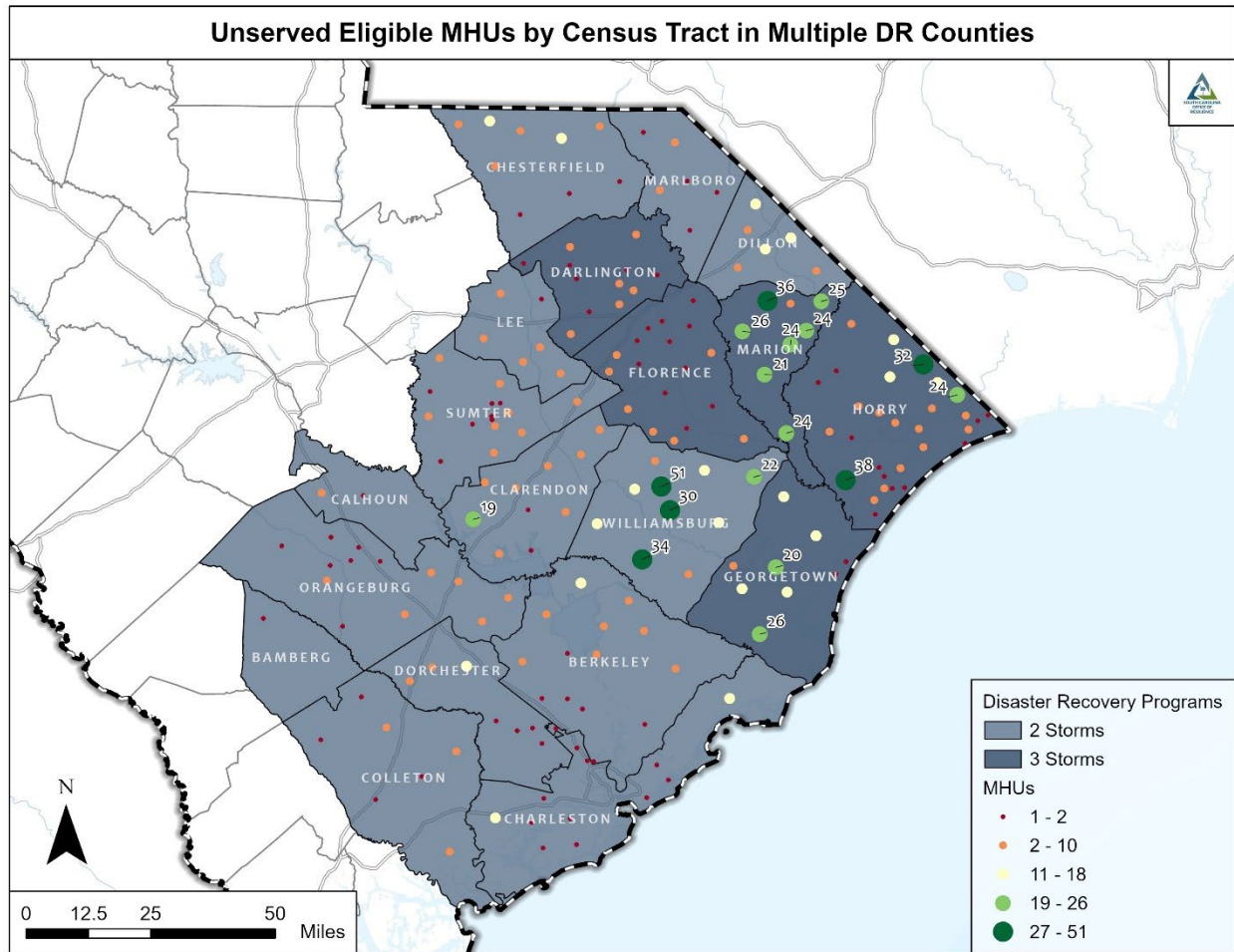


Figure 1: Unservd Eligible MHUs by Census Tract in Multiple Disaster Recovery Counties

Of the 760 unserved MHU residents in the four-county proposed project area, 122 MHU residents live in in Georgetown County, 232 in Horry County, 188 in Marion County, and 218 in Williamsburg County. Additionally, 549 are homesite renters, or owners of manufactured homes who do not own the lot underneath their unit. **Figure 2** highlights counties affected by at least two disasters (19) and depicts the eligible (low- and moderate-income) MHU homesite renters residing in these IA counties who were unserved by the SCOR CDBG-DR programs due to funding limitations. Replacing MHUs for low- and moderate-income homesite renters is in alignment with the SCOR developed Strategic Statewide Resilience and Risk Reduction Plan's (SSRRRP) recommendations for incorporating resilience into housing recovery ([SSRRRP, pp. 517-518](#)). SCOR will work with landowners and MHU residents to support affordable and long-term land leases, rent-to-own, or outright purchase for the citizen to promote homeownership and provide stability to tenants and homesite-renters of manufactured homes.

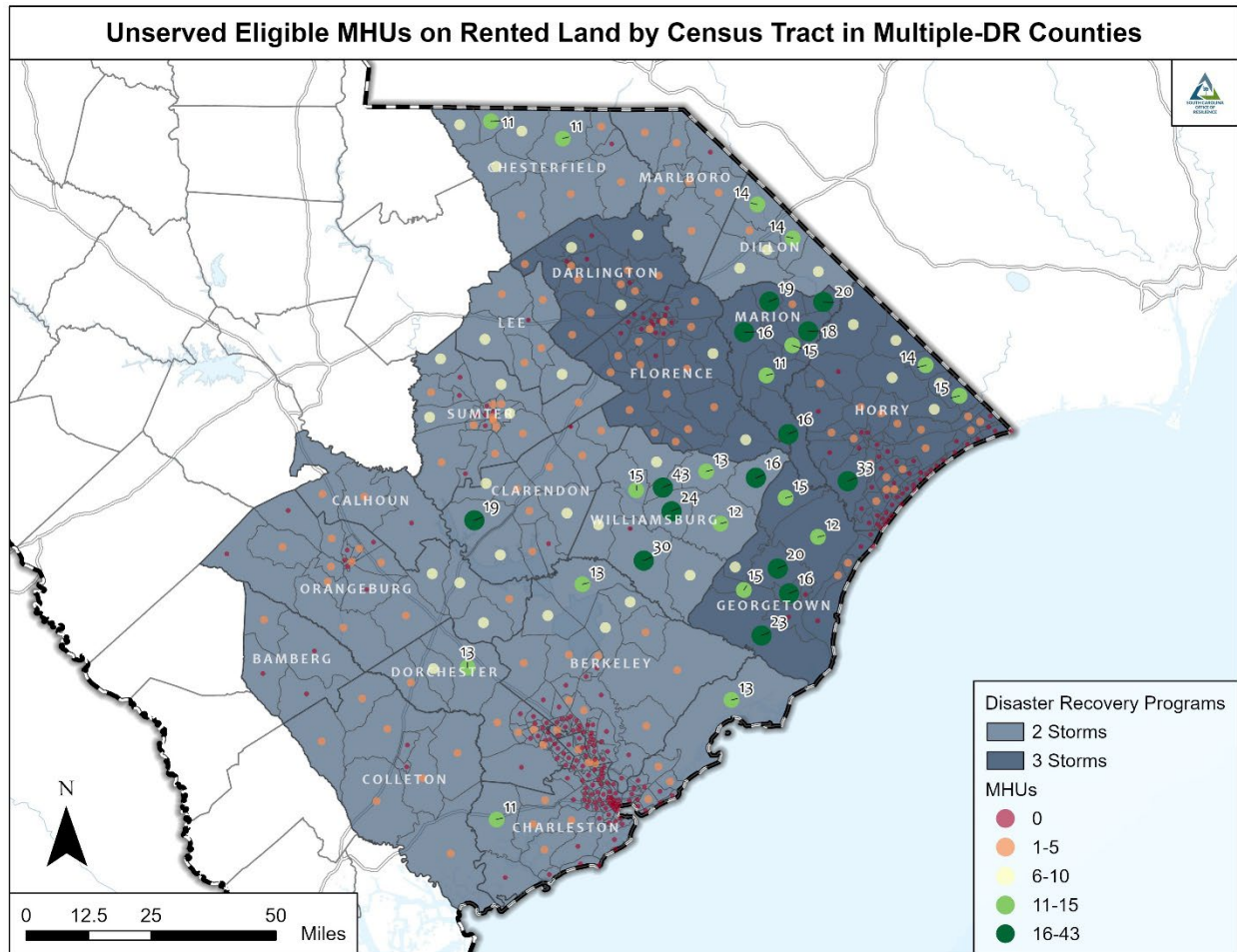


Figure 2: Unserved Eligible MHUs on Rented Land by Census Tract in Multiple-DR Counties

While there is a significant number of LMI manufactured households in need in across the state, SCOR believes targeting eligible but unserved CDBG-DR program candidates, who reside in manufactured housing and manufactured housing communities in the four counties wherein a majority of the unserved LMI MHU population reside, would allow for a ‘shovel-ready’ group of candidates who could be served quickly by the proposed program. SCOR’s experience in implementing its Disaster Recovery programs has provided insight on these MHU residents’ homes. SCOR maintains data on these homes, as well as other program information, in their grants management system. According to the damage assessments conducted by SCOR, the average age of the MHUs of the eligible yet unserved CDBG-DR candidates in the four-county project area is 37 years and most of the units were manufactured in the 1970s and 1960s. Also, a majority of these MHUs in are in poor condition and warrant replacement. Thus, the MHU stock across the proposed project area is both aging and not in decent, safe, or sanitary condition.

The MHU population in Georgetown, Horry, Marion, and Williamsburg Counties also face health and safety issues caused or exacerbated by existing substandard manufactured housing. The [Climate and Economic Justice Screening Tool \(CEJST\)](#) is a geospatial mapping tool that identifies areas across the nation where communities are faced with significant burdens. These burdens are organized into eight categories: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. A census tract is considered ‘disadvantaged’ if it meets at least one burden threshold and its associated socioeconomic threshold; these disadvantaged tracts are also known as Justice40 communities to support the [Biden-Harris Administration’s Justice40 Initiative](#). Of the 106 census tracts that comprise the four-county project area, 58 (55%) of the tracts are considered disadvantaged, as defined by CEJST. Horry County has the highest number of disadvantaged tracts with 29 out of 72 tracts, or 40%. Marion and Williamsburg counties tie for the highest percentage of disadvantaged tracts, at 100% each, with all 8 and 11 tracts considered disadvantaged, respectively. Finally, Georgetown County has 10 out of 15 tracts considered disadvantaged, or 67%.

According to CEJST, some of the socioeconomic and health and safety burdens facing the MHU population in the four-county project area include poverty, low-income and low median income, unemployment, housing costs (households making less than 80% of the area median family income and spending more than 30% of income on housing), heart disease, diabetes, asthma, and overall low life expectancy, transportation barriers, high household energy costs, lack of indoor plumbing, and wastewater discharge (toxic concentrations at parts of streams within 500 meters) and wastewater discharge (leaking underground storage tanks and active underground storage tanks within 1500 feet of the census tract boundaries). Individual damage assessments conducted by SCOR staff of the LMI MHU households also show that many of these homes have mold, holes in the ceilings and walls leading to increased exposure to cold and heat and are without HVAC systems or air conditioning units. It’s safe to say the predominate health issues these MHU residents face—asthma, heart disease, diabetes, overall low life expectancy—could be exacerbated by the safety issues noted in SCOR’s damage assessments, as well as the predominate safety issues in the project area identified and tracked by CEJST, such as lack of indoor plumbing or living near toxic concentrations of wastewater discharge and leaking underground storage tanks and releases. The need to provide these citizens with safe, sanitary, decent, and accessible affordable housing is great.

Distress Criteria

Distress criteria are defined in [2 CFR 1805.201\(b\)\(3\)\(ii\)\(D\)](#) and include communities with high rates of poverty, low income, high unemployment, and population loss. A geographic area will be considered eligible for designation as a Community Development Financial Institution (CDFI) Investment Area if it meets one or more of the objective criteria of economic distress as defined. Per the [U.S. Treasury's CDFI Investment Areas Public Viewer](#), of the 119 census tracts that comprise the proposed project area, 82 (69%) census tracts meet at least one of the Distress Criteria [and are designated CDFI Investment Areas, as defined by 2 CFR 1805.201(b)(3)(ii)(D). (An Excel spreadsheet containing this information can be found in the Attachments file.)

The economic distresses facing the project area include:

- 39 out of the 82 (48%) CDFI Investment Areas have at least 20% of their population living in poverty.
- 25 of the 82 (30%) CDFI Investment Areas have an unemployment rate of at least 1.5 times the national average.
- 48 of the 51 (94%) CDFI Investment Areas located within a [Metropolitan Area](#) have a median family income at or below 80% of Metropolitan median family income or the national Metropolitan Area median family income, whichever is greater.
- 16 of the 31 (31%) CDFI Investment Areas outside of a Metropolitan Area have a median family income at or below 80% of the statewide non-Metropolitan Area median family income or the national non-Metropolitan Area median family income, whichever is greater.
- 12 of the 31 (39%) CDFI Investment Areas located in counties outside of a Metropolitan Area, the county population loss during the period between the most recent decennial census and the previous decennial census is at least 10%, or the county net migration loss during the five-year period preceding the most recent decennial census is at least 5%.

Resilience in Disaster-Prone Areas

Of the ten [Community Disaster Resilience Zones \(CDRZ\)](#) in South Carolina as defined by the Federal Emergency Management Agency (FEMA), the grant project area is inclusive of one census tract identified as a CDRZ. Census tract 45051050500 in Horry County was identified as a CDRZ

on September 6, 2023. The census tract satisfies both of the following criteria: the composite FEMA National Risk Index (NRI) score ranks in the top 50 nationally or in the top 1% within SC and it is identified as a disadvantaged community by the Climate & Economic Justice Screening Tool.

[FEMA's National Risk Index](#) is a dataset and online tool to help illustrate the United States communities most at risk for 18 natural hazards. Compared to the rest of the U.S., Horry County scored *Relatively High* in all three Risk Index components of expected annual loss, social vulnerability, and community resilience. **Table 4** details the natural hazards that FEMA scored at “Relatively Moderate” or higher for Horry County.

Table 4: FEMA NRI for Hazards in Horry County

Hazard Type	Risk Rating	Score (percentile)
Coastal Flooding	Relatively Moderate	89.7
Earthquake	Relatively Moderate	95.1
Heat Wave	Relatively Moderate	87.3
Hurricane	Very High	99.6
Ice Storm	Relatively High	86.6
Lightning	Relatively High	97.4
Riverine Flooding	Relatively Moderate	91.2
Strong Wind	Relatively Moderate	86.7
Tornado	Relatively High	96.1
Wildfire	Relatively Moderate	93.3
Winter Weather	Relatively High	93.9

Source: [FEMA National Risk Index](#)

The four-county project area faces future risks due to natural hazards, extreme weather, and disasters events. Due to recent climate, population, and land development trends, the impact of heavy rain and hurricanes are expected to increase property damages in South Carolina, and these 4 counties have taken the brunt of these changes in recent years. Georgetown, Horry, and Marion counties were each affected by federally declared disasters (2015 Severe Storm, Hurricane Matthew in 2016, and Hurricane Florence in 2018), and Williamsburg County was affected by two disasters (2015 and 2016). Flooding events occurring in this corner of South Carolina (the Pee Dee region) are typically multi-pronged: coastal flooding is compounded by massive rains which initially flood the area, and subsequently floodwaters from North Carolina further impact low-lying communities before reaching the coast in Georgetown, SC. **Figure 3** depicts the current and future flood risks facing the proposed project's beneficiaries according to the FEMA administrative Special Flood Hazard Area (100-Year Floodplain) and the First Street Foundation's future (2053) projected 1% Annual Chance Flooding Event.

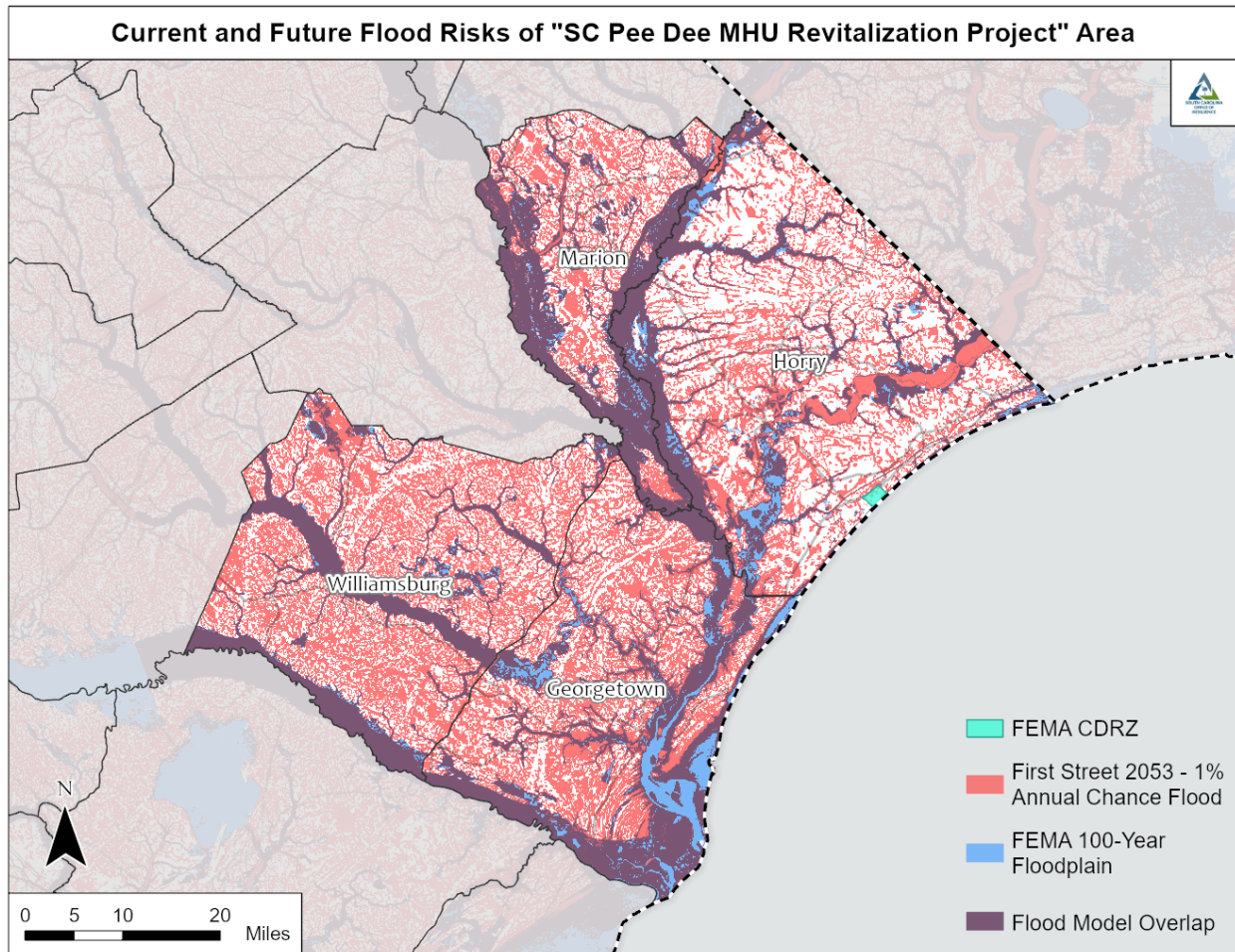


Figure 3: Current and Future Flood Risks of "SC Pee Dee MHU Revitalization Project" Area

Wind and flood damage to manufactured housing is often difficult to repair, due to the integrated nature of the building components. Often the full extent of flood damage to MHUs is not always realized in the early months after an extreme weather event or disaster and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home's structure or insulation can develop over time as well. Limited assistance funds portioned out through fragmented assistance programs can lead to piecemeal repairs that add up in cost, without adequately addressing restoration of the home's structural integrity to a decent, safe and sanitary standard ([SC Severe Storm 2015 Action Plan, p. 38](#)).

Replacing older MHUs with more resilient, weatherized MHUs for low- and moderate-income homesite renters is in alignment with the SCOR-developed Strategic Statewide Resilience and Risk Reduction Plan's (SSRRRP) recommendations for incorporating resilience into housing

recovery and would enhance the manufactured housing's safety and stability in the face of natural hazards, as well as mitigating known hazards and the rising threat that extreme weather events present to manufactured housing due to climate change ([SSRRRP, pp. 517-518](#)).

Additionally, the relocation of residents of MHUs or MHCs in hazard-prone areas (in accordance with 2 CFR 200, subpart E – Cost Principles, 49 CFR part 24, 24 CFR part 42, 24 CFR 570.606, and the fair housing and nondiscrimination requirements set forth at 24 CFR part 5), such as the FEMA floodplains and other identified flood prone areas, and providing new, affordable housing on safer land, SCOR will assist in making manufactured housing and manufactured housing communities in the proposed four-county project are become more resilient. These homes will be less likely to be subjected to flooding and more likely to recover in the event of another flood disaster.

Barriers to Manufactured Housing Revitalization

One of the main barriers to manufactured housing revitalization in the four identified counties is citizens' financial situations. Many LMI households lack the income to maintain their homes or make improvements. Repairs, if any, are usually temporary emergency repairs. Prospective candidates for SCOR's PRICE Main project (who were previously unserved CDBG-DR program applicants) are LMI. Most live on Social Security benefits, Social Security Disability Insurance (SSDI) or "Disability," or Supplemental Security Income (SSI). Home maintenance on older homes is difficult to prioritize over food and utilities. As far as replacing an aging or damaged manufactured home, prices for MHUs during and after the COVID-19 pandemic have skyrocketed and remained high.

Exhibit D: SOUNDNESS OF APPROACH

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South Carolina Office of Resilience (SCOR)

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Project Vision and Goals

SCOR envisions a simple but powerful approach to revitalize the manufactured housing and manufactured housing communities (MHCs) in four specific counties in South Carolina: Georgetown, Horry, Marion, and Williamsburg. SCOR proposes to replace ninety (90) aging MHUs which are also in a state of extreme disrepair. Using existing eligible, previously unserved applicants to SCOR's three CDBG-DR programs, SCOR will replace MHUs on leased or rented lots only. MHUs will be replaced with more energy-efficient, and resilient homes.

Through SCOR's three CDBG-DR programs, the general poor condition of South Carolina's large MHU stock has been recognized as endemic. SCOR's goal is to revitalize manufactured housing and MHCs, so that LMI persons have access to affordable, accessible, energy efficient, and climate resilient homes while also protecting their health and safety. While some MHUs in the state have been replaced, funding limitations have prohibited additional replacements.

Eligible Activities

With funds from the PRICE Main grant, SCOR seeks to replace manufactured housing units for LMI households, wherein the prospective candidates would be those determined to be eligible (yet unserved due to funding constraints) for SCOR's CDBG-DR programs from South Carolina's 2015, 2016, and 2018 federally declared disasters.

Community engagement and outreach will begin with, but not be limited to, direct contact of the identified eligible yet unserved previous applicants from SCOR's CDBG-DR programs. Additionally, town halls, social media, and print media will be utilized to solicit and determine a pool of potential candidates for the PRICE Main program. Once candidates are affirmed or re-affirmed eligible, they will be prioritized by Area Median Income (AMI), as well as disability status and age dependency (**Figure 4**).

	HOUSEHOLD'S (AMI) AREA MEDIAN INCOME CATEGORY			
	30% AMI or BELOW	31% AMI to 50% AMI	51% AMI to 80% AMI	81% AMI to 120% AMI
Applicant's Household Includes <i>Either</i> Age Dependent or Disabled	1st Priority	3rd Priority	5th Priority	7th Priority
Applicant's Household Includes Neither Age Dependent or Disabled	2nd Priority	4th Priority	6th Priority	8th Priority

Figure 4: SCOR's PRICE Main Program Applicant Prioritization Grid

Upon initial prioritization, a damage assessment of the MHU will occur and age and condition of the MHU will be determined. Projects will be ranked by age (oldest ranked highest) and condition (poor condition ranked highest) to determine the final pool of applicants to serve.

Award notifications will alert applicants that SCOR intends to replace their MHU with PRICE Main grant funds. For those applicants who accept the award, a landowner authorization will be required. SCOR will work with applicants and landowners to ensure that the land is available and affordable for the applicant for at least ten years. This will provide both housing affordability and stability for the MHU resident.

When the landowner authorization is in place, a 'homeowner signing' will be scheduled with the applicant and SCOR attorneys and staff in attendance. During the homeowner signing, applicants will sign a homeowner agreement and promissory note. The homeowner agreement identifies the scope of work that will be done and the homeowner's acceptance of said scope. It further discusses the homeowner's rights and responsibilities, the one-year warranty on the new MHU, the temporary storage unit afforded to the applicant, demolition authorization, size of the MHU, and color selections for the MHU siding, etc. The promissory note discusses the forgivable three-year lien to be placed on the MHU to ensure the applicant remains in the home. The lien will be recorded with the county.

Upon signing the above-mentioned documents, the temporary storage unit will be placed, permits will be pulled, and the homeowner will move out of the old home. SCOR has been tremendously successful in helping citizens find temporary lodging while their homes are being repaired, replaced, or reconstructed. From the 2015 CDBG-DR housing program to the current 2018

program, costs to temporarily house citizens were reduced 99%. Disaster case managers will work with applicants to find suitable accommodations during the installation period of their new replacement MHUs. Of the 456 citizens served (so far) in SCOR's 2018 Hurricane Florence CDBG-DR program, only one applicant has failed to find suitable temporary lodging on their own. (SCOR paid for temporary lodging for this citizen.) It is anticipated that all applicants will find suitable temporary lodging for the MHUs replaced in the PRICE program.

Once the applicant has vacated the home and a demolition permit has been acquired, the old MHU will be demolished and removed from the site. The new MHU will be moved to the site and installed. If a ramp is required, it will be built to the correct code. If there is a septic system, and municipal sewer is not available, a septic system inspection will occur. If the septic system fails inspection, the tank and drain field will be replaced. SCOR believes that municipal water and sewer are more resilient solutions than wells and septic systems and will connect the citizen to such systems, if available and the applicant agrees. If the soil on which the MHU will sit is not amenable to supporting the new MHU, soil remediation will occur. This can include removing the unsuitable soil and replacing with engineered fill, wrapped gravel, and/or enhanced footers.

SCOR will work with MHU manufacturers and the Insurance Institute for Business and Home Safety (IBHS) to ensure that the new MHUs adhere to [IBHS's Fortified™ standard](#). This standard includes an enhanced roof. The roof sheathing (minimum of 7/16" OSB or plywood) will be attached with ring shank nails, spaced at 4" on center, within 4' of the roof edges and each side of the ridge and at 6" on center throughout the rest of the roof. The roof deck will be entirely covered with a full layer of self-adhering polymer-modified bitumen membrane covered with #15 felt. Alternatively, the vertical and horizontal deck seams can be taped with a #30 felt overlayment. Drip edge and high wind rated shingles will be installed. SCOR has visited IBHS's test and research facility and believes that their Fortified™ standard drastically increases the homes resilience to water intrusion from damaged shingles, ice dams, and wind-driven rain. IBHS tests shingles over many years to determine durability and resilience to water intrusion. Foundations and tie-downs will be enhanced. All replacement MHUs will be rated for Wind Zone II or greater.

Should any change order be required for additional, non-standard work, SCOR's Special Case Panel (SCP) will review the scope for need and appropriateness, and the requested funds will be

reviewed for cost reasonableness. The Special Case Panel has been effectively used in both SCOR's CDGB-DR and CDBG-MIT programs. The SCP is a best practice, and with SCOR's guidance, other grantees have begun to use such a tool.

MHUs will be installed by licensed contractors. Any additional, non-standard work must be approved by SCOR's SCP before work is begun. Emergency approval is available, but all change orders must be approved by SCP before the work can be invoiced and paid. All contractors will be managed by SCOR to ensure good workmanship, completeness, and resolved warranty claims. SCOR's compliance inspectors are well versed in all facets of MHU construction and installation. Multiple site visits will be conducted on all job sites.

After completion of construction (installation of the MHU), a one-year warranty period begins. Citizens are given their warranty packets at key turnover, which contains the warranty telephone number, owner's manuals, and a tutelage on operation of the thermostat, water heater, and appliances. Should the applicant have a warranty, a call to the warranty line will open the claim. A SCOR case manager will enter the warranty claim, send the warranty to the contractor, and communicate with the applicant and contractor until the warranty claim is resolved. A warranty resolution document will be entered to the system of record upon resolution. SCOR thoroughly enforces warranty resolution. Should a dispute in resolution, between homeowner and contractor develop, SCOR inspectors will investigate and adjudicate. SCOR will make the final decision on whether the matter is resolved, unresolved, or non-warranty.

Upon conclusion of the warranty period, for a particular project, the final retainage will be paid to the contractor, and the project will be considered closed. Once all warranties have expired and been resolved, SCOR will prepare to close out the grant.

Timeline and Key Tasks

With a project start date of October 1, 2024, as per the NOFO, SCOR anticipates the following timeline (projects will be implemented in all four counties simultaneously):

Milestone	Timeline
Award Announcement	Late Summer 2024
Project Initiation <ul style="list-style-type: none"> Develop Action Plan Procure Vendors Develop Policies and Procedures 	July 2024 to October 2024 <ul style="list-style-type: none"> July – September 2024 September – October 2024 July – September 2024
Execute Grant Agreement	October 1, 2024
Pre-Construction <ul style="list-style-type: none"> Applicant Outreach Eligibility, Priority, Ranking <ul style="list-style-type: none"> Eligibility Affirmed or Re-affirmed. Priority Determined Damage Assessments MHU Age & Condition Ranked 	October 2024 to June 2025 <ul style="list-style-type: none"> October – December 2024 January – April 2025 <ul style="list-style-type: none"> January to March 2025 March to April 2025 April to June 2025 May to June 2025
Construction <ul style="list-style-type: none"> Award Notification Homeowner Signing MHU Replacement 	July 2025 to July 2028 <ul style="list-style-type: none"> Begin July 2025 Begin August 2025 Begin August 2025 End July 2028
End of Construction <ul style="list-style-type: none"> Final Home Replaced End of Warranty Period (final) 	March 2027 <ul style="list-style-type: none"> July 2028 July 2029
Grant Closeout	NLT July 2030

Budget

The budget (attached separately) for this project is derived from estimates of purchased and installed MHUs (to include the [IBHS Fortified™ standard](#), handicap ramps, septic system replacement, connecting to municipal water and sewer, demolition of old MHU, soil remediation – all as needed). Prices will be monitored and updated quarterly, as the market demands. Staff hours were estimated using existing knowledge of time demands of SCOR's CDBG-DR programs.

Projected Impacts

Energy standards and the IBHS Fortified™ standard provide the opportunity for LMI persons to access more energy efficient and climate resilient housing solutions. Energy efficient homes reduce financial strain on LMI MHU residents, as less of their gross income will be spent on energy bills. The aging MHU population in South Carolina are, for the most part, energy inefficient. Improvements in construction practices, building materials, and appliances in modern MHUs have made great strides toward making the units more energy efficient. SCOR will employ these improvements when replacing MHUs, expanding LMI persons' access to energy efficiency and advancing the sustainability of manufactured housing and manufactured housing communities.

SCOR intends to incorporate the IBHS Fortified™ standard into the proposed PRICE Main program. This standard will greatly increase the MHU's resilience to both driving wind and excessive rain associated with both tropical storms and hurricanes. The enhanced roof and foundation will strengthen the climate resilience of the MHU and protect the health and safety of manufactured housing residents.

Affordability and Equity

Replacing an MHU resident's home with a more climate resilient, and energy efficient MHU and providing each MHU with an electric heat pump will allow the resident to focus on building wealth instead of making costly repairs and paying higher energy bills. Focusing on land renters will afford SCOR the opportunity to work with MHU residents, manufactured housing communities (MHCs) and landowners to promote long-term leases, rent-to-own agreements, or outright purchase of the land.

LMI citizens will be the focus of this project, as it has been with SCOR's three CDBG-DR housing programs. SCOR has experience engaging with LMI communities and working with LMI clients. Using the [Social Vulnerability Index \(SoVI\)](#), developed by the Hazards and Vulnerability Research Institute at the University of South Carolina, SCOR identifies LMI communities and focuses its outreach in those areas. Empirical data shows that the vast majority of CDBG-DR replaced MHUs have remained in excellent condition and that MHU residents are investing in their home's upkeep and maintenance.

Protections for MHU Residents

SCOR will work with MHU residents and landowners to promote long-term leases, rent-to-own agreements, or outright purchase of the land where possible. SCOR, through its legal team, will provide information to MHU residents who rent the land upon which their homes sit, of their rights as land renters. Information for legal and housing counseling will also be provided. Assistance for land acquisition or issues involving heirs' issues, which is common in South Carolina, will be provided. SCOR's attorneys have experience with assisting homeowners with heirs' issues.

Access to Resources and Financing for Underserved Communities and Persons

This project will support accessible housing opportunities for underserved, LMI disabled individuals by providing options for handicap ramps, wider doorways, handicap accessible bathrooms, walk-in showers, and other options. SCOR has provided many homeowners with accessible homes throughout its 3,428 completed projects. SCOR tracks and reports Section 3 data. Economic opportunities are promoted for low-income individuals via SCOR contractors and subcontractors. SCOR encourages its vendors to hire local, low-income workers.

Significant Hazards for Project Sites

South Carolina has experienced an increase in flooding events since the historic flood of 2015. Rains from Hurricanes Matthew (2016) and Florence (2018) produced incredible flooding. After any significant rain event, water flows from North Carolina to Georgetown, SC, causing flooding as it makes its way to Winyah Bay. Many areas in SC are prone to flooding and located in flood plains. As outlined in the Strategic Statewide Resilience and Risk Reduction Plan (SSRRRP), SCOR believes the best way to mitigate the effects on flooding on homes is to remove the citizens

from harm's way. SCOR will work with MHU residents to locate a new lot for their replacement MHU outside of the FEMA floodplain or any other identified flood prone areas. SCOR has had considerable success mitigating flood damage through its CDBG-DR and CDBG-MIT programs and by following the guidance of the SSRRRP.

Current and Future Threat of Natural Hazards, Extreme Weather, and Disaster Events

This project will support LMI persons by relocating them to suitable land outside of the FEMA floodplain or other identified flood prone areas, if their current MHU is located in these areas. In SCOR's three CDBG-DR programs, MHU replacements have successfully been relocated to areas out of the FEMA floodplain. This greatly decreases the likelihood that the home will be significantly damaged by future flooding.

The MHUs replaced with PRICE Main grant funds will be built to the Insurance Institute for Business and Home Safety (IBHS) Fortified™ standard, with enhanced roofs and foundation. Additionally, all MHUs will be elevated to a minimum of 32" for those not in the FEMA floodplain. MHUs are anchored every 48" or by using the Oliver Anchoring System. However, if local building code is more stringent, that will be used. These building measures increase the climate resilience of manufactured housing, making them more resistant to heavy rains, flooding, and wind.

Advancing Environmental Justice

This project will advance environmental justice for the underserved communities and LMI persons we will serve. Protection from flooding will occur when applicants located in the FEMA floodplain or other identified flood prone areas are assisted in finding alternate land outside of these areas. SCOR has experience in removing MHU residents from flood prone areas through its CDBG-DR and CDBG-MIT buyout program. (The goal of SCOR's buyout program is to relocate citizens out of harm's way and restore the natural function of the floodplain.)

All new MHUs will be equipped with heat pump HVAC units, which are more energy efficient and better for the environment. Green and energy efficiency standards will be met, if not exceeded, such as those provided by the U.S. Department of Energy's Guidelines for Home Energy Professionals. For all new MHUs, SCOR will require ENERGY STAR certification standards and

green building standards. These improvements also align with [SCOR's current EPA Climate Pollution Reduction Grant Program](#). Additionally, SCOR will connect MHU residents up to the municipal water and sewer system, if available. Should municipal sewer not be available for some MHU residents, SCOR will replace their septic system.

Community Engagement

Since 2015, SCOR has held monthly stakeholder meetings, only recently moving to quarterly meetings as the disaster recovery and mitigation programs have matured. SCOR staff have toured the state informing citizens of the SSRRRP and other staff members regularly attend local public and community meetings. Additionally, SCOR is frequently asked to participate in panel discussions by resilience, mitigation, or disaster recovery organizations (Figure 4). Community engagement is a part of SCOR's everyday mission and participation in local events, meetings, and forums allow for the effective planning and coordination of statewide resilience programs.

Date	Event	Audience
9/25/2023 – 12/6/2023	Resilience Plan rollout events	Local governments, agency and nonprofit partners
10/12/2023	Public Hearing: HUD PRO Housing Grant Application	Public
10/26/2023	Public Meeting: USS Yorktown environmental remediation project	Public
12/12/2023	Ran Testimony before Congress in DC	Congress, public
3/12/2024	Resilience Plan Advisory Committee Meeting	Advisory Committee organizations, agencies, partners
3/13/2024	Public Meeting: City of Rock Hill - Stormwater Improvement Project	Public
3/27/2024	Quarterly Stakeholders Meeting	Disaster Recovery stakeholders
4/4/2024	Public Meeting: Lake City - Infrastructure Project	Public
4/25/2024	Public Meeting: Town of Winnsboro - Stormwater Improvement Project	Public
4/26/2024	Public Meeting: City of Beaufort - Stormwater Drainage Improvement Project	Public
4/30/2024	Public Meeting: Town of Nichols - Nature Based Stormwater Park	Public
5/9/2024	Public Meeting: City of Hanahan - Stormwater Improvement Project	Public
5/13/2024	Public Meeting: Laurens County - Stormwater Improvement Project	Public
5/15/2024	Public Meeting: City of Rock Hill - Stormwater Improvement Project	Public
5/21/2024	Isle of Palms Hurricane Preparedness Event	Public
5/22/2024	Public Meeting: Bucksport Infrastructure Project	Public
6/1/2024	Dorchester County Hurricane Preparedness Event	Public
6/11/2024	City of Charleston Ehrhardt Tunnel Ribbon Cutting Ceremony	Public

Figure 5: Community Engagement

Existing Community Plans and Policies for Project Sites

South Carolina is an MHU-friendly state. This proposal aligns with all local policies and building codes, as proved by the extensive work previously done in the identified counties by SCOR. SCOR consistently works closely with county and local officials to ensure that policy and code alignment are upheld. All building projects are permitted and subject to municipal inspections and local and state building codes.

Using U.S. Housing and Urban Development (HUD) Community Development Block Grant-Mitigation (CDBG-MIT) funding, SCOR is assisting Williamsburg County with developing their comprehensive plan. The plan will include ten elements: Population, Natural Resources, Resiliency, Land Use, Economic Development, Cultural Resources, Community Facilities, Housing, Transportation, Priority Investment. The plan will serve as a road map for decision making in the county and will guide growth and development, public facility investments, regulation of land use, and economic development initiatives. The SC Local Government Planning Enabling Act was amended by the Disaster Relief and Resilience Act ([S.C. Code Ann. § 48-62-30 et seq.](#)) to require resilience and is an excellent place to identify and prioritize strategies for hazard mitigation. Williamsburg is a rural county, often faced with the impacts of natural hazards, and is one of the only remaining counties in the state that does not currently have zoning and is in need of updates to its land development regulations, which require an up-to-date comprehensive plan. The plan will identify, prioritize, and identify implementation and funding strategies for programs, policies, and projects for resilient county development. SCOR's SC Pee Dee MHU Community Revitalization Program activities will align with the SCOR-assisted Williamsburg County Comprehensive Plan.

Exhibit E: CAPACITY

**HUD PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY
ENHANCEMENT (PRICE) COMPETITION**

South Carolina Office of Resilience (SCOR)

DRAFT

Experience Managing Projects and Utilizing Grant Funds

As of the date of this application, SCOR has replaced 1,398 and repaired 391 MHUs. The experience gained from almost over eight years of supervising contractors affords SCOR the means to plan, organize, implement, and manage the proposed PRICE Main project. Of the total 3,428 completed CDBG-DR housing recovery projects to date, 1,789 have been MHUs. The other 1,638 projects were stick-built rehabilitations or reconstructions. SCOR's housing-focused programs have been managed by a consistent team of professionals throughout the life of the programs.

In addition to SCOR's housing programs and projects, the agency manages mitigation and resilience projects funded by its CDBG-MIT grant, such as stormwater infrastructure, floodplain buyouts, matching, and plans and studies. SCOR has a diverse range of program and project managers, engineers, financial, audit, administrative, and support personnel at its disposal for this proposed project.

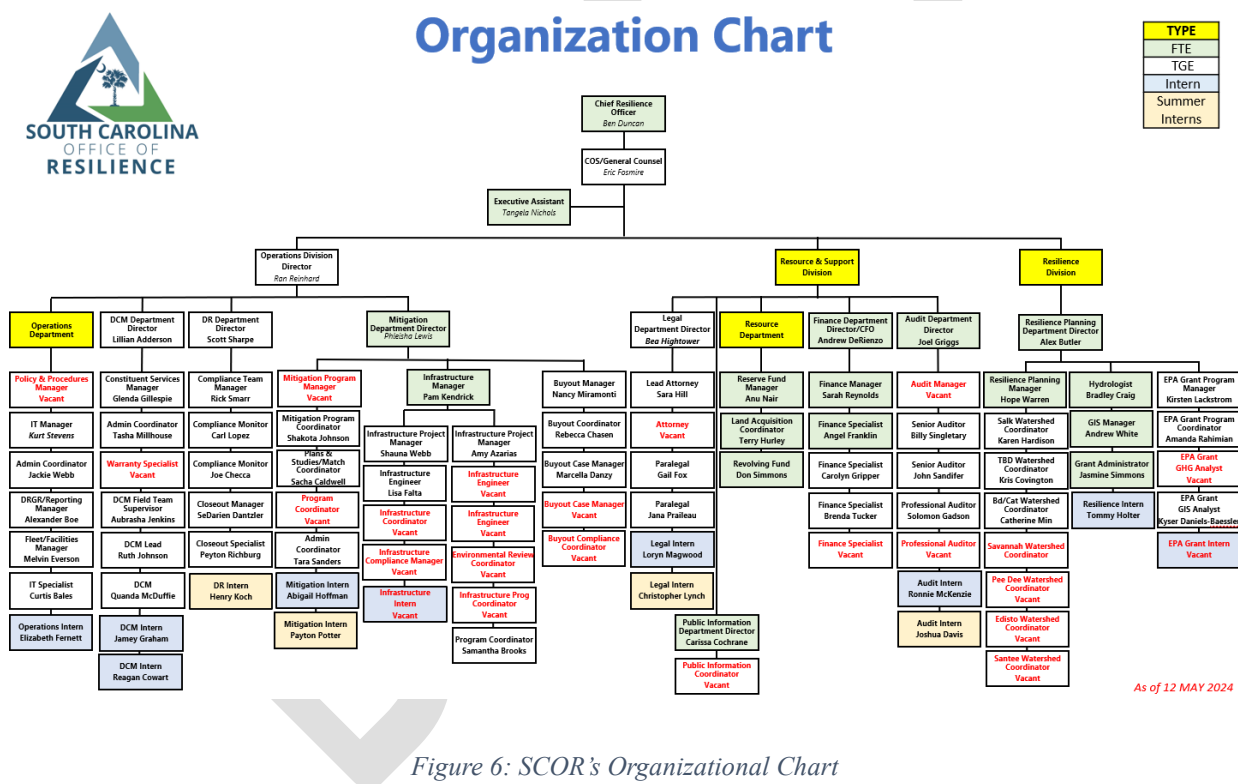
SCOR manages or has managed three CDBG-DR grants totaling \$293M, with an additional \$11,320,000 in leveraged funds. The 2015 Flood CDBG-DR grant (\$126M) was closed out on time, under the Program Administration Cost (PAC) cap, and without any findings from its HUD monitoring visits. Construction is complete for the 2016 Hurricane Matthew CDBG-DR grant (\$95M). This grant will close out on time and under the PAC cap. Moreover, there were no findings issued by HUD after conducting their monitoring visit. Construction for the 2018 Hurricane Florence grant will be complete by October 2024 (two years early) and the grant will be closed out on time and will be under the PAC cap. Additionally, SCOR manages its CDBG-MIT grant of \$162M. The CDBG-MIT projects and activities are ahead of schedule and the grant will close out well ahead of its 12-year life.

The proposed PRICE Main grant project will be managed responsibly, efficiently, and transparently by experienced professionals. SCOR has financial and reporting systems in place to ensure that all programs meet HUD requirements. SCOR has experience managing grants, reporting in the HUD Disaster Recovery Grant Reporting (DRGR) system, closing grants (2015 Flood CDBG-DR grant), and with HUD monitoring and technical assistance visits. Members of

SCOR have attended every HUD Problem Solving Clinic since 2016 and have participated in many HUD webinars.

Key Staff

Currently, SCOR has a director of Disaster Recovery who manages the CDBG-DR programs and will oversee the PRICE Main activities. A full-time Temporary Grant Program Manager will be employed as well as a full-time Temporary Grant Project Coordinator. SCOR has full-time financial staff, audit staff, legal staff, inspectors, reporting manager, and case managers who will lend expertise to these functions. Please see the current SCOR organizational chart below (**Figure 6**).



As of 12 MAY 2024

Figure 6: SCOR's Organizational Chart

Promoting Racial Equity

Across SCOR's three CDBG-DR programs, 3,428 total housing projects have been completed to date. SCOR CDBG-DR program demographics show that the program applicants are predominantly African American, with female-led homes, with at least one disabled person, and

with an average applicant age of 70 years (**Figure 7**). Using the existing populations of eligible but unserved applicants would ensure this continuity. SCOR's public hearings, town halls, and engagements in these communities keeps the citizens informed.

Demographics	All Programs
Race - White	5.25%
Race - African-American	92.53%
Race - Other	2.22%
Female-Led Households	80.10%
Households Containing Disabled Members	71.52%
Average Applicant Age	70 years
Average Household Size	1.99

Figure 7: Demographics of SCOR's CDBG-DR Programs

Of the 760 eligible yet unserved MHU residents in Georgetown, Horry, Marion, and Williamsburg counties, 700 (92%) are African American, 597 (79%) are female-led homes, 354 (47%) have a disabled household member, and the average household size is 2.1 persons. The average age of the applicant is 65 years. Many households meet multiple Demographic Priority Categories (**Figure 8**).

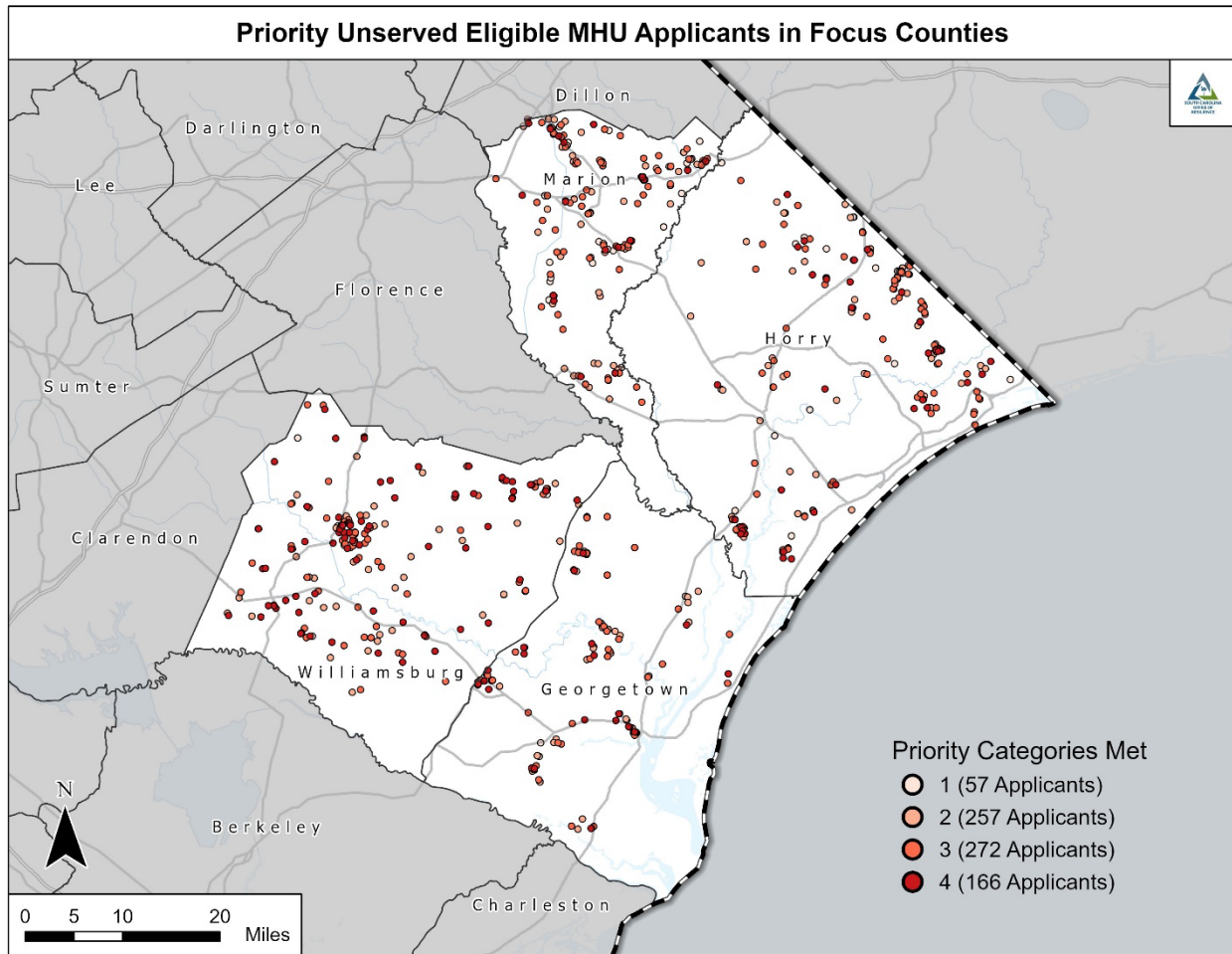


Figure 8: Unserved Eligible MHUs by Census Tract: Demographic Data of Four Identified Counties

Environmental Reviews

SCOR has extensive experience conducting HUD Environmental Reviews as a responsible entity under 24 CFR Part 58 for CDBG-DR grants in 2015, 2016, and 2018, and a CDBG-MIT grant. SCOR will apply its considerable environmental experience with previous HUD grants to this project to ensure accurate and timely completion of an Environmental Review in accordance with all HUD requirements. SCOR will oversee the environmental review, public notices, completion of the final report, and submittal of the request for release of funds (RROF) to HUD through the HUD Environmental Review Online System (HEROS). SCOR will not take choice limiting actions on the project until Authority to Use Grant Funds (AUGF) is received from HUD. During construction, SCOR will monitor the work to ensure all mitigation measures identified in the environmental assessment are conducted as required. SCOR will update the Environmental Review Record (ERR) throughout the project as necessary.

Experience with Cross-cutting Federal Requirements

SCOR has much experience with HUD CDBG-DR and CDBG-MIT grants. SCOR complies with 2 CFR part 200, including administrative requirements, cost principles, and audit requirements for federal awards. The management, finance, and audit teams, at SCOR, have many cumulative years of experience with cross-cutting requirement monitoring.

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Exhibit F: MATCH OR LEVERAGE

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

South Carolina Office of Resilience (SCOR)

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SCOR has leveraged funds in each of its three CDBG-DR programs. [South Carolina State Housing Finance and Development Authority](#) (SC Housing) has been an excellent partner to SCOR, in serving the most vulnerable citizens of our state. SC Housing's stated mission is to "create quality affordable housing opportunities for the citizens of South Carolina," and their vision is "that all South Carolinians have the opportunity to live in safe, decent, and affordable housing." To those ends, SC Housing has provided \$1,500,000; \$2,500,000; and \$7,320,000 to our 2015 Flood, 2016 Hurricane Matthew, and 2018 Hurricane Florence disaster recovery programs, respectively.

For the 2015 Flood program, SC Housing funds touched 150 homes, at \$10,000 each, and provided for an additional 28 homes that would not have otherwise been repaired, replaced, or reconstructed. For the 2016 Hurricane Matthew program, the leveraged funds from SC Housing touched 250 homes, at \$10,000 each, and provided an additional 38 repairs, replacements, and reconstructions. At \$15,000 each, the \$7,320,000 leveraged funds for the Hurricane Florence program will touch 488 homes and add an additional 60 homes that would not have otherwise be served. In total, \$11,320,000 provided an additional 126 repaired, replaced, or reconstructed homes for South Carolina's most vulnerable citizens. All leveraged funds are used for construction costs only. No PAC costs were recouped from these funds.

SCOR believes that SC Housing will continue to provide leverage funds to SCOR with the mission of creating quality affordable housing for the citizens of South Carolina. If awarded with PRICE Main funding, SCOR intends to partner with SC Housing to broaden the proposed project. SCOR's relationship with SC Housing is supported by their executive director and its board.

Exhibit G: LONG-TERM EFFECT

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

South Carolina Office of Resilience (SCOR)

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As stewards of federal CDBG-DR funds, SCOR complies with HUD's mission to develop viable and equitable communities by the provision of decent housing, a suitable living environment, and expanding economic opportunities, principally for LMI persons. To this end, all funded activities administered by SCOR will meet a HUD National Objective. SCOR will maintain records showing that funded activities meet one of the National Objectives, specifically that being the benefitting LMI persons.

Long-Term Effect

This application focuses on providing safe, sanitary, secure, and resilient housing for South Carolina's LMI citizens. Furthermore, citizens served by this program will have an asset that will last far beyond this PRICE Main grant's period of performance, ensuring long-term availability, accessibility, and affordability for LMI households, as well as promoting equitable community development that generates wealth building for underserved communities.

Focusing on MHU residents that are homesite renters allows those most vulnerable to generate wealth (the manufactured housing unit) and begin working toward land and home ownership. Encouraging long-term lot leases, rent-to-own land purchases, and permanent foundations promotes long-term affordability and accessibility of manufactured housing for LMI persons and communities.

As with SCOR's CDBG-DR programs, a 3-year forgivable lien will encourage citizens to stay in their home, maintain their landscape, and improve their homes (i.e., patios, decks) with additions. After action reviews of CDBG-DR replaced MHUs shows the majority of program participants are maintaining their homes and yards exceedingly well.

By serving LMI households, SCOR will ensure that underserved communities benefit from this proposed grant project. SCOR CDBG-DR program demographics show that the program applicants are predominantly African American, with female-led homes, with at least one disabled person, and with an average applicant age of 70 years (Figure 6). Using the existing populations of eligible but unserved MHU residents would ensure this continuity.

Of the 760 eligible, yet unserved due to funding limitations, CDBG-DR applicants in Georgetown, Horry, Marion, and Williamsburg counties, 700 (92%) are African American, 597 (79%) are

female-led homes, 354 (47%) have a disabled household member, and the average household size is 2.1 persons. The average age of the applicant is 65 years.

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Attachment A: ADVANCING RACIAL EQUITY

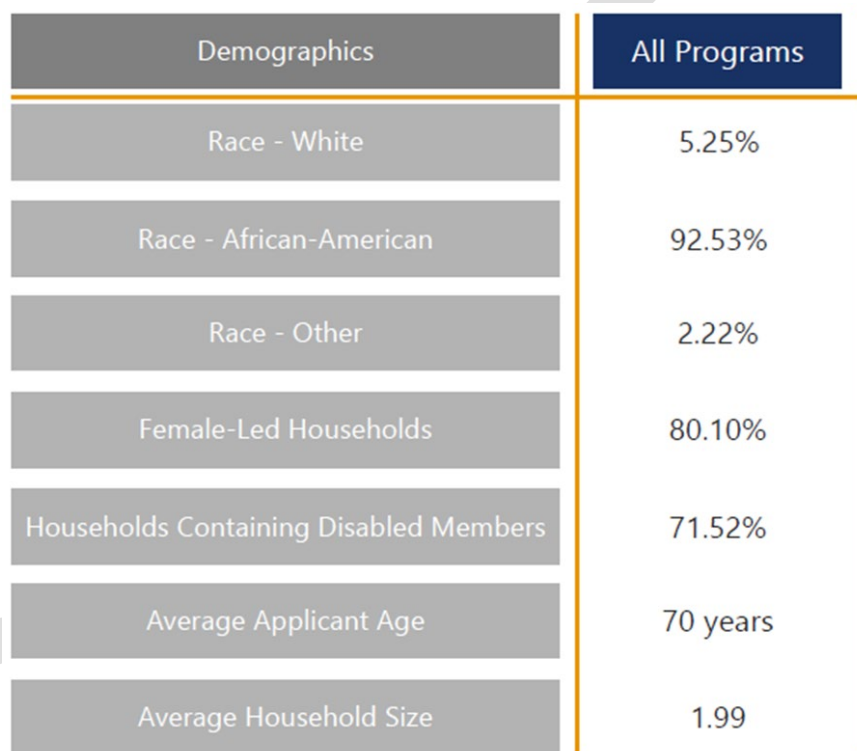
**HUD PRESERVATION AND REINVESTMENT INITIATIVE FOR COMMUNITY
ENHANCEMENT (PRICE) COMPETITION**

South Carolina Office of Resilience (SCOR)

DRAFT

Attachment A: ADVANCING RACIAL EQUITY

Across the South Carolina Office of Resilience's (SCOR) three HUD CDBG-DR programs for the 2015 Severe Flood, Hurricane Matthew (2016) and Hurricane Florence (2018) 3,428 total housing projects have been completed to date. The demographic breakdown of SCOR's CDBG-DR programs (**Figure 7**) show that the program applicants are predominantly African American, with female-led homes, with at least one disabled person, and with an average applicant age of 70 years.



Demographics	All Programs
Race - White	5.25%
Race - African-American	92.53%
Race - Other	2.22%
Female-Led Households	80.10%
Households Containing Disabled Members	71.52%
Average Applicant Age	70 years
Average Household Size	1.99

Figure 7: Demographics of SCOR's CDBG-DR Programs

As indicated in the narrative exhibits, SCOR proposes to target the eligible (low- and moderate-income) yet unserved applicants of SCOR's CDBG-DR programs for the SC Pee Dee MHU Community Revitalization Program. SCOR has assisted 1,789 low- and moderate-income (LMI) MHU residents across South Carolina with the rehabilitation or replacement of their homes through its CDBG-DR programs. However, due to funding limitations, there were over 1,350 eligible MHU residents, all LMI, across twenty-seven disaster impacted counties who could not be served by the program. 760 (56%) of the LMI unserved MHU population reside in the proposed

project area of Georgetown, Horry, Marion, and Williamsburg Counties. Administering a manufactured housing revitalization program to the eligible yet unserved MHU population in these four counties would allow for a ‘shovel-ready’ group of candidates who could be served quickly by the proposed project, as well as ensure the continuity of SCOR’s work in supporting advancing racial equity in communities that have been historically underserved.

SCOR maintains data on the CDBG-DR program beneficiaries, as well as those applicants who were unable to take part in the program due to funding limitations. According to SCOR’s CDBG-DR grants management system, of the 760 LMI unserved MHU residents across Georgetown, Horry, Marion, and Williamsburg Counties, 700 (92%) are African American, 597 (79%) live in female-led homes, 354 (47%) have a disabled household member, and the average household size is 2.1 persons. The average age of the applicant is 65 years. Many households meet multiple Demographic Priority Categories (**Figure 8**).

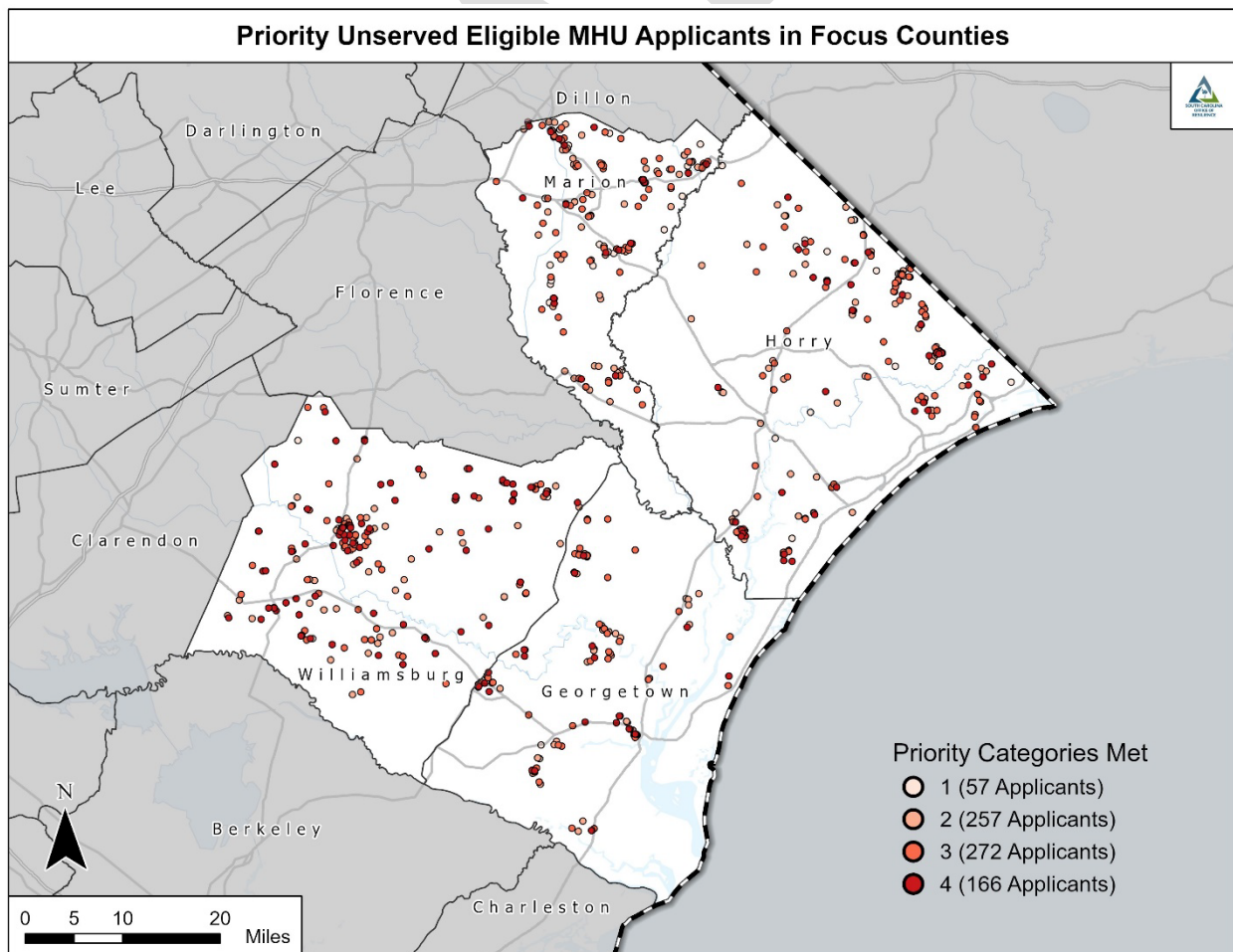


Figure 8: Unserved Eligible MHUs by Census Tract: Demographic Data of Four Identified Counties

As detailed in the Targeting Vulnerable Populations section of SCOR's [CDBG-MIT Action Plan](#) (Amendment #5), SCOR devised a strategy to ensure that their CDBG programs “positively impacted members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, as well as concentrated areas of poverty” (CDBG-MIT Action Plan, pg. 96). When developing their Action Plans for all federally declared disasters, as well as CDBG-MIT activities, SCOR partnered with the [South Carolina Hazards Vulnerability & Resilience Institute](#) (HVRI) to target outreach efforts to maximize the benefit to protected classes. Additionally, SCOR coordinated with the South Carolina Commission for Minority Affairs for the purpose of using data-driven outreach efforts to identify areas where concentrations of protected classes exist. The South Carolina Commission for Minority Affairs exists to maintain a comprehensive database of statistics regarding minority populations throughout South Carolina and they utilize this data to inform policy decisions for decision makers in the state. SCOR will continue this strategy when developing the racial equity components of the SC Pee Dee MHU Community Revitalization Program and will detail this process in their PRICE Action Plan.

Disproportionately burdened and vulnerable populations often face barriers to equitably benefiting from social and financial programs. These populations have historically been marginalized and discriminated by housing policies, lack of public investment, and forced into outer, more rural areas due to lack of affordable housing units, in addition to lack of access to transportation and/or public transportation and services that have been cut off due to poor infrastructure such as roads. Persons with Limited English Proficiency and those who are differently abled or with accessibility issues also face issues equitably benefiting from social and financial programs. Based on the data from the Climate and Economic Justice Screening Tool (CEJST) the MHU population in Georgetown, Horry, Marion, and Williamsburg Counties also face significant burdens as it pertains to climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. There are 58 disadvantaged tracts, or [Justice40](#) communities, across the four-county project area. Horry County has the highest number of disadvantaged tracts with 29, next is Williamsburg County with 11, Georgetown County with 10, and finally Marion County with 8. According to CEJST, some of the socioeconomic and health and safety issues facing the MHU population in the four-county project area include poverty, low-income and low median income, unemployment, housing costs (households making less than 80% of the area median family income and spending more than 30% of income on housing), heart disease, diabetes,

asthma, and overall low life expectancy, transportation barriers, high household energy costs, lack of indoor plumbing, and wastewater discharge and underground storage tanks and releases.

As detailed in the Targeting Vulnerable Populations section of SCOR's [CDBG-MIT Action Plan](#) (Amendment #5), SCOR devised a strategy to ensure that their CDBG programs “positively impacted members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, as well as concentrated areas of poverty” (CDBG-MIT Action Plan, pg. 96). When developing their Action Plans for all federally declared disasters, as well as CDBG-MIT activities, SCOR partnered with the [South Carolina Hazards Vulnerability & Resilience Institute](#) (HVRI) to target outreach efforts to maximize the benefit to protected classes. Also, SCOR coordinated with the South Carolina Commission for Minority Affairs for the purpose of using data-driven outreach efforts to identify areas where concentrations of protected classes exist. The South Carolina Commission for Minority Affairs exists to maintain a comprehensive database of statistics regarding minority populations throughout South Carolina and they utilize this data to inform policy decisions for decision makers in the state. SCOR will continue this strategy when developing and implementing the SC Pee Dee MHU Community Revitalization Program in order to prevent, reduce, and eliminate potential barriers to persons of communities of color equitably benefitting from the proposed grant activities, and will detail this process and strategy in their PRICE Action Plan. Additionally, community engagement activities, such as participating in local events, meetings, forums, conducting public hearings, town halls, and other engagements, as well as direct contact with prospective program beneficiaries will be employed to inform communities of the grant project's activities.

Attachment B: AFFIRMATIVE MARKETING

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SCOR is committed to advancing racial equity and affirmatively furthering fair housing through the proposed SC Pee Dee MHU Revitalization Program. Activities performed, housing, services or other benefits provided under the PRICE Main grant will be broadly and affirmatively marketed communities throughout the proposed four-county project area of Georgetown, Horry, Marion, and Williamsburg counties. The PRICE Main grant activities will be marketed to vulnerable populations, disproportionately burdened and historically underserved communities, as well as any other demographic group(s) that would be unlikely or least likely to apply to such programs and services. Please see the description below of affirmative marketing activities for the SC Pee Dee MHU Revitalization Program:

- SCOR will market the program activities via social media and direct outreach.
 - The groups for targeted outreach include Black/Brown persons, Hispanic or Latino individuals that may have limited English proficiency, and those with disabilities or families with children, among other protected groups.
 - To extend its reach, SCOR leverages its social media channels as well as traditional media (press releases, local media, etc.) to inform the public of its activities and to reach a diverse audience. Social media posts and traditional media releases will be utilized to highlight the benefits of the proposed manufactured housing unit replacement and manufactured housing community revitalization program, and to provide information and guidance on the application process.
- SCOR will provide grant program information and its eligibility requirements and will encourage applications by those least likely to be served.
 - Marketing materials and community engagements will be designed to be accessible to individuals with disabilities to ensure that this protected class has opportunity to learn and apply for the housing program. This marketing will highlight the accessibility features of the PRICE Main grant activities to ensure that families and persons with special needs are aware of the new housing program and its affordable, suitable, and accessible options.
- An Affirmative Fair Housing Marketing Plan will be created and available for review upon program approval and initiation. The plan will be published on SCOR's website to

include prominent posting. Notice of the plan's posting will be disseminated to community contacts and through marketing on SCOR's social media channels.

- All publications or other materials will contain required fair housing or equal opportunity language when appropriate.
- Through its CDBG programs, SCOR continually monitors the effectiveness of its marketing strategies and collects feedback from community members and stakeholders. This feedback assists in refining approaches and addressing unmet needs or barriers faced by potential applicants. SCOR will employ this same process with the PRICE Main grant program.
- SCOR will maintain documentation on the affirmative outreach and marketing activities and will report and share this information with HUD and other interested parties.
- Overall, SCOR's CDBG programs have a particular focus on low- and moderate-income persons, families, and communities, and those who have historically underserved, to include people of color, those with disabilities, and those with limited English proficiency. The affirmative marketing strategy for the proposed grant program will be designed to engage communities that are traditionally underrepresented and/or underserved, ensuring that these communities are aware of and can benefit from the housing, services, and other benefits of the proposed grant program.

Attachment C: AFFIRMATIVELY FURTHERING FAIR HOUSING

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ATTACHMENT C: Affirmatively Furthering Fair Housing

The South Carolina Office of Resilience (SCOR) will comply with all Affirmative Marketing and Fair Housing laws and will not deny services to anyone due to discrimination because of race, color, religion, sex, national origin, handicap, familial status, or age, if all or part of the applicant's income derives from any public assistance program. During the planning for and implementation of the "SC Pee Dee MHU Revitalization Project," SCOR will adhere to the requirements associated with the Fair Housing Act (42 U.S.C. 3601-3619), implementing regulations at 24 CFR part 100 *et seq.*, and those outlined at 24 CFR 5.151. SCOR's efforts and activities will focus on ensuring equitable access to safe, accessible, and healthy housing for protected classes.

For the "SC Pee Dee MHU Revitalization Project," SCOR will target the four SC the most (760 or 56%) CDBG-DR eligible (low- and moderate-income), unserved MHU households reside. According to data from the [Climate and Economic Justice Screening Tool](#) (CEJST), over half (55%) of the census tracts that comprise the four-county proposed project area are considered disadvantaged, as defined by CEJST. These citizens are disproportionately burdened it pertains to issues associated with climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. Some of the socioeconomic and health and safety issues facing the MHU population in the four-county project area include poverty, low-income and low median income, unemployment, housing costs (households making less than 80% of the area median family income and spending more than 30% of income on housing), heart disease, diabetes, asthma, and overall low life expectancy, transportation barriers, high household energy costs, lack of indoor plumbing, and wastewater discharge and underground storage tanks and releases. Furthermore, per the [U.S. Treasury's CDFI Investment Areas Public Viewer](#), 69% of the census tracts that comprise the four-county proposed project area, 82 (69%) census tracts meet at least one of the Distress Criteria (and are designated CDFI Investment Areas), as defined by 24 CFR 1805.201(b)(3)(ii)(D). These four counties are also susceptible to extreme weather, disaster events, and natural hazards such as extreme heat, hurricanes, flooding, and wildfires; these areas also have a scarcity of affordable housing, lack of resources to support MHU residents and MHCs, and a need for improved infrastructure, especially transportation infrastructure.

SCOR will engage previously eligible (low- and moderate-income) MHU households who were unserved by their CDBG-DR programs due to funding limitations, as well as other LMI, vulnerable, MHU residents/households who are less likely to apply for housing assistance. A key benefit to manufactured housing is that they can be easily customized for people with disabilities, including such features as ramps, lower counters, wider doorways, and accessible bathrooms. SCOR maintains data on the CDBG-DR program beneficiaries, as well as those applicants who were unable to take part in the program due to funding limitations. According to SCOR's CDBG-DR grants management system, of the 760 LMI unserved MHU residents across Georgetown, Horry, Marion, and Williamsburg Counties, 700 (92%) are African American, 597 (79%) live in female-led homes, 354 (47%) have a disabled household member, and the average household size is 2.1 persons. SCOR will track and report their marketing, outreach, and community engagement activities to maintain documentation of their fair housing efforts. SCOR will also, at minimum, report and maintain data on the race, ethnicity, and disability status of those who apply for assistance under the SC Pee Dee MHU Revitalization Program, as well as those who complete the application process and receive assistance/become program beneficiaries.

Through the development and implementation of the SC Pee Dee MHU Revitalization Program, SCOR will take meaningful actions that address significant disparities in housing needs for the MHU populations of Horry, Georgetown, Marion, and Williamsburg counties. These actions, in addition to combating discrimination, will work to overcome patterns of segregation that restrict access to opportunity based on protected characteristics, while maintaining compliance with civil rights and fair housing laws. Where available, SCOR's proposed grant activities will be consistent with each jurisdiction's Analysis of Impediments (AI), an Assessment of Fair Housing (AFH), or other means of fair housing planning that meaningfully supports their AFFH certification. If the proposed grant activities are carried out in a jurisdiction with an AFH, the proposed activities will be consistent with the AFH's fair housing goals and with fair housing strategies specified in the jurisdiction's Consolidated Plan or Public Housing Agency Plan.

Attachment E: EVIDENCE OF PARTNERSHIP LETTERS

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ENHANCEMENT (PRICE) COMPETITION

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Attachment E: EVIDENCE OF PARTNERSHIP LETTERS

N/A

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