

Tule River Economic Development Corporation
PRICE Public Action Plan
07.27.25

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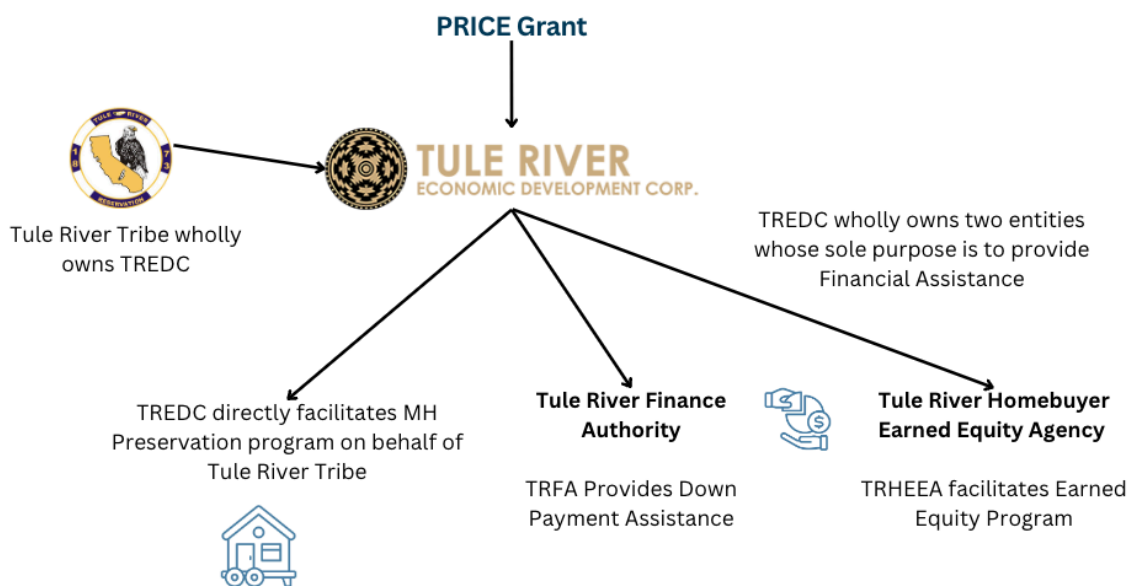
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Action Plan Summary

The Tule River Economic Development Corporation (TREDC) is pleased to present its transformative plan under the FY23 PRICE grant to catalyze long-term, sustainable changes in the housing finance landscape. This initiative aims to advance housing access and empower low and moderate-income (LMI) families and tribal communities across the nation.

TREDC is an eligible provider of down payment assistance loans for FHA, Section 184, the United States Department of Agriculture (USDA), USDA Section 502 Single Family Housing Guaranteed Loans and the Department of Veteran Affairs Guaranteed Loans. We collaborate with correspondent lenders to provide down payment assistance alongside their mortgage loans to end-consumers. TREDC operates its nationwide programs in compliance with HUD, FHA, Section 184, USDA, and VA guidelines and currently provides down payment assistance to nearly 3,000 qualifying borrowers in 48 states. In this proposal, we specifically focus on working with Section 184 correspondent lenders, whose mortgage loans assist tribal members on and off tribal land.

Our proposal strategically leverages \$14,920,944.98 in PRICE funding to mobilize an additional \$204,271,422 of private capital, applicant match and program income. This massive infusion of capital is projected to bridge thousands of families to homeownership by mitigating the financial obstacles that disproportionately impact tribal and LMI populations.



TREDC is wholly owned by the Tule River Tribe. TREDC also wholly owns the Tule River Finance Authority and Tule River Earned Equity Agency, which administer the Down Payment Assistance (TRFA) and Earned Equity (TRHEEA) programs. TREDC's proposed activities under PRICE are below:

1. Manufactured Home Preservation and Revitalization for low and moderate income Tule River Tribal Members, which will be completed on the Tule River Reservation in California
2. Financial Assistance, which will serve low and moderate income families across the nation and will focus on tribal members utilizing Section 184 mortgage loans
 - a. Down Payment Assistance via TRFA, featuring a forgivable 0% interest loan
 - b. The “Earned Equity Program” via TRHEEA, which provides a lease option period to bridge families to homeownership who need to improve their credit before qualifying for a conventional or federally-backed mortgage loan.

Our proposal targets the following impacts:

1. **Homeownership Accessibility:** Through our Down Payment Assistance and Earned Equity Programs, we will directly assist 845 families by reducing upfront costs and providing pathways to homeownership, especially focusing on those who are "almost mortgage-ready" but hindered by financial constraints.
2. **Preserve and Revitalize Existing Manufactured Housing:** We propose extensive rehabilitation of 90 existing manufactured homes on the Tule River Reservation, enhancing the long-term housing affordability for residents of these manufactured housing. This includes infrastructure improvements such as foundation repair, roof repair, heating/cooling repair and installation and other critical habitability improvements.
3. **Economic Support:** Focused on addressing obstacles to homeownership faced by LMI households and tribal communities (e.g., credit or financial readiness), our programs are designed to enable these groups to build wealth and secure economic stability through homeownership. Specifically, we are targeting 25% of loans to be issued to Tribal members accessing Section 184 mortgage loans.
4. **Long-term Impact without Long-term Dependency:** Our model relies on initial federal support to catalyze private investment. This ensures long-term viability without continual federal funding. It also promotes economic independence among beneficiaries while ensuring that homes stay affordable for at least 15 years.

This proposal represents a strategic opportunity for HUD to significantly influence the national Section 184 lending landscape and the broader manufactured housing finance sector. The planned activities and programs are not only poised to fulfill immediate housing needs but are structured to ensure lasting benefits, aligning with HUD’s objectives of fostering broad community development, economic resilience, and enhanced quality of life for all Americans.

Tule River Economic Development Corporation agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. Tule River

Economic Development Corporation will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

Administering Entity Contact Information

The Tule River Economic Development Corporation (TREDC) is the grantee and administering entity for this program. TREDC is responsible for overseeing all aspects of the grant, including procurement, compliance, financial and performance reporting, and monitoring of recipients and contractors.

Primary Contact:

Dennis Ickes

Chief Executive Officer

Tule River Economic Development Corporation

31071 Highway 190

Porterville, CA 93257

(559) 202-0401 (Direct)

(559) 359-6211 (Cell)

dennis@tuleriver.com

Resources and Budget

We have been awarded \$14,920,944.98 from PRICE. This funding will mobilize an additional \$204,271,422 of private capital from FHA and Section 184 lenders across the nation and will bridge thousands of families to homeownership through this unique opportunity to catalyze investment in naturally affordable manufactured homes. One hundred percent of the funding we receive will benefit low and moderate income persons, far exceeding the 70% requirement of the PRICE grant.

PRICE Application Summary Budget - TREDC		
Analysis of Total Estimated Costs	Estimated Cost	Percent of Total
1 Personnel (Direct Labor)	\$ 986,902.80	0.4%
2 Fringe Benefits	\$ 98,690.28	0.0%
3 Travel	\$ 17,400.00	0.0%
4 Equipment	\$ -	0.0%
5 Supplies and Materials	\$ 165,000.00	0.1%
6 Consultants	\$ 1,187,500.00	0.5%
7 Contracts and Sub-Grantees	\$ 212,421,250.00	96.1%
8 Construction	\$ 5,684,100.00	2.6%
9 Other Direct Costs	\$ 220,560,843	99.8%
10 Indirect Costs	\$ 465,116.98	0.2%
Total:	\$ 221,025,960.06	100.0%
Federal Share:	\$ 14,920,944.98	6.8%
Match (Expressed as a percentage of the Federal Share):	1481%	

6.8% of the total project funding comes from HUD as a federal share, with the balance of 93.2% sourced from private capital, applicant match and program income. Over 95% of the total capital deployed will be delivered to low and moderate income households as financial assistance in the form of manufactured housing mortgage loans from private lenders and down payment assistance through the PRICE grant. Additionally, 2.6% of the total capital, representing 38% of the PRICE grant, will be allocated for essential preservation and revitalization efforts for existing manufactured homes on the Tule River Reservation. This approach balances the need for immediate local housing revitalization for 90 families on the Tule River Reservation while

allocating the majority of resources to support nearly 800 low and moderate-income families nationwide.

1. Personnel (Direct Labor): TREDc is providing Direct Labor personnel as an Applicant Match. We anticipate that the four staff members listed in the budget will allocate between 10-20 hours/week to manage all projects, both local and national in scale.

2. Fringe Benefits: The fringe benefits are 10% of the base salary rate for all personnel. This is also provided as an Applicant Match.

3. Travel: This includes yearly trips for consultants to visit the Tule River Reservation for annual community workshops and feedback.

5. Supplies and Materials: For loan projects, borrower tracking and expense tracking for individual assets, we anticipate utilizing a Salesforce subscription. For accounting software, we will utilize Netsuite for all projects.

6. Consultants: Program management and support will be provided by external parties.

7a. Contracts: We will outsource credit counseling, the financial audit, accounting and DPA note servicing.

Up to 6 credit counseling sessions will be offered to our Earned Equity clients. We are anticipating that while nearly all clients will complete the first session, only 30% of our EEP tenants will take advantage of the ongoing counseling sessions, based on historical experience. For note servicing, half of our portfolio will incur \$25/month per loan which will be paid for through program income. The other half of the portfolio will utilize the 0% interest forgivable loan, which will not require monthly servicing.

Roughly \$510,000 of program income from our Down Payment Assistance principal and interest payments will be recycled to cover the cost of note servicing payments. If three quarters of our loans perform during the program period at a 6% interest rate, this will enable us to service all of our Repayable DPA loans at \$25/month.

7b. Sub-Grantees:

All Down Payment Assistance is listed as a form of Financial Assistance issued as "Subgrantee" awards in the budget. Specifically, TREDc facilitates DPA through its subsidiary, TRFA and the Earned Equity Program through a separate subsidiary, TRHEEA. TRFA and TRHEEA operate as pass-through entities and do not have separate staff members, charge fees or earn program income.

Because the DPA and EEP programs both catalyze the private markets to fund low-income borrowers purchasing manufactured homes, roughly 90% of the project costs

covered in this section are provided by 'Other' sources - private lenders issuing FHA and Section 184 mortgage loans.

8a. Administrative and legal expense: The figures listed represent part-time accounting support and construction management support to manage vendors who will complete the rehabilitation of 90 homes on the Tule River Reservation.

8c. 3 months relocation: The estimate for temporary relocation is based on average temporary hotel and Airbnb lodging in Portersville, the nearest town to Tule River Reservation. We anticipate all residents with significant foundation, roof work and whose homes are replaced will need to be temporarily relocated.

8e. Other architectural and engineering fee: In this section we've included an estimate for the Environmental review both for the DPA/EEP program and for the Tule River Reservation Manufactured Housing project.

8f. Project inspection fees: We anticipate completing a full home inspection on all 90 manufactured homes. This will include a repair estimate and an inspection report.

8i. Construction: The eight construction line items listed are based on discussions and surveys with residents, and meetings with Tule River staff, the Tule River Tribal Council, and Tule River Indian Housing Authority board. Repair items in the budget represent the top requests for repairs, adjusted by the percentage of residents requesting each type of assistance and weighted by the approximate percentage of homeowners on the reservation that are Low and Moderate Income.

10. Indirect Costs: The Indirect Costs were calculated using the de minimis rate of 15% of Modified Total Direct Costs (MTDC). The calculation of MTDC is based on direct salaries, wages, fringe benefits, materials and supplies, travel and up to the first \$25,000 of each of the 4 subawards listed in the proposal.

Need

TREDC was awarded funding under the PRICE Main program.

Homeownership as a Cornerstone of the American Dream

Homeownership is a common goal for most people and a critical piece of the American Dream. A Fannie Mae survey from the end of 2021 found that 83% of all renters, and an even higher percentage of renters of color, desire to own a home. Despite this strong desire, many renters face significant financial barriers to homeownership. Evidence from single-family rental surveys suggests that between *one and three million* households are actively working towards buying a home but are uncertain about their financial ability to do so.

Three conditions must be met for low- and moderate-income (LMI) families to break into homeownership: an affordable enough home purchase price, sufficient savings for the down payment and closing costs, and a high enough credit score to qualify for a mortgage. By focusing on naturally affordable manufactured housing, the PRICE competition addresses the first barrier. However, the other two barriers remain significant obstacles for many LMI families.



Credit and Savings Barriers

LMI families often face credit problems that prevent them from accessing standard mortgage products. The median credit score for low-income families is significantly lower than for high-income families, with high-income families averaging credit scores of 774 and low-income families lagging significantly at a median of 658. Manufactured housing borrowers also tend to have lower credit scores than their site-built counterparts. According to a 2021 study, a staggering 42% of all manufactured housing home purchase applications were denied. In comparison, only 7% of site-built applications were denied (CFPB Office of Research). This data demonstrates that there is a significant need among ‘almost mortgage ready’ renters and manufactured housing applicants.

Beyond this, nearly two-thirds of renters see down payments as a prohibitive factor in home buying (Federal Reserve’s 2022 Survey of Household Economics). The cost of a manufactured home, although significantly lower than the average stick-built home, requires significant savings for a down payment and closing costs. Accumulating enough savings for a down payment and closing costs of roughly \$12,000 to \$20,000 for even a relatively inexpensive manufactured home represents a significant burden for many prospective LMI homebuyers. According to the Federal Reserve Board’s Survey of Consumer Finances, the median savings of lower-income households is just \$2,100 for Black and Hispanic Americans and \$6,000 for Asian

and American Indian households - significantly below what would be required for the down payment and closing costs on a home. Furthermore, manufactured-home owners tend to have lower incomes and net worth than site-built homeowners, so the adjusted savings rate for lower-income minority manufactured homeowners is likely below the figures cited by the Federal Reserve.

Studies show that even small amounts of down payment assistance can significantly increase homeownership rates. A 2005 HUD study found that as little as \$1,000 can lead to a 19-percent increase in the number of low-income households buying a home and that assistance of up to \$10,000 can lead to a 34-percent increase in overall homeownership.

In the United States, tribal communities face unique housing challenges, and Native American homeownership has historically been far lower than average. While the Section 184 Indian Home Loan Guarantee Program was created in 1992 to address the lack of mortgage lending in Indian Country, challenges remain for these individuals and many tribal families face high rates of poverty, exasperating the savings and credit issue mentioned above. Section 184 loans typically require manual underwriting, which is more cumbersome for lenders than underwriting standard FHA loans and leads to lower origination rates. The limited number of loans originated on Tribal lands corresponds with both low origination rates and high denial rates. Lenders approved an annual average of just 35 percent of applications to Native Americans on reservation lands between 2013 and 2015, citing credit history most often as the reason for application denials.

Expanding Current Programs to Serve LMI and Tribal Families

Our existing Earned Equity Program has successfully provided homeownership opportunities to prospective homeowners who are unable to secure conventional mortgages due to credit and other underwriting barriers. Simultaneously, our Down Payment Assistance program currently serves higher-credit, medium-income borrowers with decent income who need modest assistance with down payments and closing costs. These programs are vital as they offer a pathway to homeownership for the "missing middle"—individuals with the necessary financial resources who need support in building their credit scores and managing the initial costs associated with acquiring a home.

Despite these successes, there remains a significant demographic with unmet housing needs: low and moderate-income families, particularly those in tribal communities. The primary challenges for these families include not only securing affordable homes but also accumulating sufficient savings for down payments and closing costs, coupled with overcoming credit hurdles.

Federal funding through the PRICE grant will help us extend our proven program framework to LMI and tribal populations. With federal support, we can provide:

- Down Payment Assistance: Provide concessionary and forgivable down payment assistance loans to low and moderate income families
- Enhanced Program Capacity for Tribal Applicants: Increase our operational capabilities to support tribal mortgage applicants utilizing Section 184 loans

- Deeper Support for LMI Families: With additional financial support, we can offer free credit counseling to families enrolled in our Earned Equity Program.

Need for Manufactured Home Preservation on the Tule River Reservation

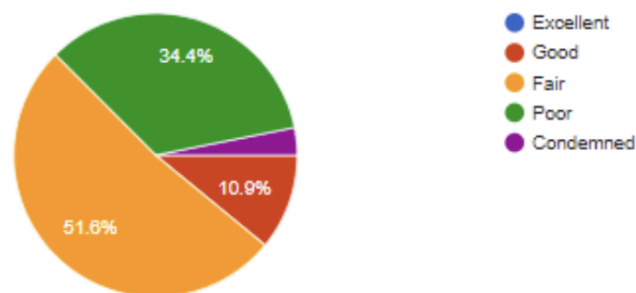
Currently, the most pressing issue facing the Tule River Tribe is a lack of affordable housing for members of the Tribe. The population on the Reservation has increased over recent years and 15% of homes currently experience overcrowding. Affordability is also a major issue, with housing costs exceeding 50% of annual income for over 40% of households. Furthermore, The Tule River Reservation currently has a poverty rate of 32.5%—more than 2.5 times higher than the national average. Nearly 75% of households are considered low or moderate income.

Manufactured homes and detached single-family homes are the dominant housing units for owner-occupants on the Tule River Reservation. However, many of the existing 120 manufactured housing units are aged and in disrepair, with only 3 of the units built after 2010. As the Tule River Master Plan notes, over a quarter of units were built before 1970 and that the current housing stock has a high percentage of manufactured homes. An estimated 75% of the units will need to be repaired and 15% replaced in the next 10 years.

A survey of Tule River Reservation manufactured housing residents on the Tule River reservation in May-July 2024 revealed that 37.5% of manufactured home owners rate their homes to be in ‘poor’ or ‘condemnable’ condition. Experts from the Housing department estimated the number of condemnable manufactured homes to be up to 30%.

2) How would you rate the current condition of your manufactured home?

64 responses



Foundation support is critically needed for manufactured homes on the Tule River Reservation due to erosion and settling of native soil. Currently, the Indian Health Service (IHS) does not mandate stable foundations for new manufactured housing units. As a result, 110 of the 120 manufactured homes on the reservation have been placed directly on the ground without any foundation support. The Reservation's soil composition consists primarily of moisture-retaining Alfisols and Mollisols, which, while productive for agriculture, are soft and unstable. Consequently, many manufactured homes are sinking into the ground.

The catastrophic and highly unusual South Tule River Flood compounded these issues in March 2023. According to a FEMA report, the South Tule River Flood caused over \$640,000 of damage to 37 homes on the Tule River Reservation, 21 of which were mobile homes.

Remediation work has not yet been completed because the current insurance does not cover damage from flooding and residents do not have sufficient savings to cover the costs themselves.

Beyond foundation work, additional critical needs as identified by manufactured housing residents include:

- Roofing: many roofs are decades old, leaking and require repair
- Plumbing: Persistent issues due to unstable foundations and recent flooding
- Electrification: Electrical panels are outdated and need upgrading. Additionally, many homes don't have electricity at all
- Climate Control: Many units use outdated swamp coolers and need air conditioning. Other units don't have electricity and go without any heating or cooling
- Siding: Without adequate awnings, rain water seeps through the doors and leads to structural issues. New awnings and windows are needed to mitigate water intrusion

3) What are the most urgent repairs or improvements needed in your home? (Select all that apply)

64 responses



Barriers to Manufactured Housing Preservation on Tule River Reservation

Limited flat land within the Reservation boundary restricts new housing development, making the preservation of existing units critically important. Currently, the responsibility for maintaining manufactured homes on the Tule River Reservation falls solely on the homeowners. Although the Tule River Indian Housing Authority (TRIHA) manages the maintenance of rental units, all manufactured homes on the reservation are individually owned, meaning TRIHA's grant funding does not apply. Most homeowners on the reservation have incomes below 80% of the Area Median Income (AMI), and have little cash available for major repairs. Homeowners must cover ongoing maintenance costs with limited financial assistance from the Tribe.

High poverty rates, economic hardships faced by tribal members and the limitations of financial assistance programs hinder residents' ability to undertake their own housing preservation and revitalization projects. These conditions underscore the urgent need for targeted interventions to improve housing stability.

Distress Criteria

Our MHDPA and MHEEP will be exclusively available to LMI families. Additionally, the Tule River Reservation meets Distress Criteria defined in 12 CFR 1805.201(b)(3)(ii)(D). Specifically, the unemployment rate is 21.8%, which is 4x higher than the national average.

Community Disaster Resilience

The Tule River Reservation is not designated as a Community Disaster Resilience Zone. However, it is identified by the Climate & Economic Justice Screening Tool as at high risk for natural hazards as it ranks in the 96th percentile for ‘building loss rate,’ which measures the economic loss to building value resulting from natural hazards each year, the 93rd percentile for ‘projected wildfire risk, and the 83rd percentile for ‘projected flood risk.’ These rankings are very negative, as they suggest that the Tule River Reservation is at extreme risk compared with other communities for the hazards listed above. As a result, the Tule River Reservation must work significantly harder than other communities to mitigate wildfire, heat and flood risks.

Our proposal enhances resilience for Tule River Tribe homeowners by stabilizing foundations of manufactured homes and preventing water damage. We will also retrofit homes with fire-resistant materials to reduce wildfire risks and replace ineffective swamp coolers with air conditioning units to combat extreme heat, ensuring safer and more comfortable living conditions.

Use of Funds - Soundness of Approach

Project Description, Management, and Impact

TREDC is guided by the principle that the decisions made today should consider the needs of tribal members and all communities three generations in the future. We envision a society where the opportunity to own a safe and healthy home is available to everyone in America, with decisions made today considering the needs of future generations.

Our project goals are:

1. To enhance the quality of life and housing stability for Tule River Tribal community members through the revitalization of existing manufactured housing on the reservation.
2. To increase homeownership rates among low and moderate-income families across America and Tribal members in particular by providing accessible financing options for purchasing manufactured homes.

Unique among PRICE applicants, our proposal features a national footprint and the capacity to positively impact thousands of LMI and Tribal families across the nation. While most other state and local governments will likely present work plans that serve a highly specific target population and geographic area, our proposal serves a local population while uniquely providing financing access to any FHA or Section 184-qualifying LMI family in the country who needs help saving for their down payment or building a credit payment history to purchase a naturally more affordable manufactured home. This proposal features a specific carve-out for the Tule River community while our broader Down Payment Assistance and Earned Equity programs can serve any member of a federally recognized Tribe, including those who did not have the time, knowledge or resources to respond to this NOFO.

Due to the 14:1 matching funds ratio achieved through this proposal and the ability to mobilize over two hundred million dollars to low-income families and into Tribal communities across the nation, we believe HUD has the ability to impact the broader national Section 184 lending landscape with a modest investment in TREDC's programs. By offering Down Payment Assistance for Section 184 loans and FHA-backed manufactured housing mortgages, we will enhance the accessibility of these lending options. Down payment assistance removes a critical financial barrier for countless potential homeowners, encouraging lenders to engage more confidently with Tribal borrowers, LMI communities and the manufactured housing asset class in general. This is expected to result in a substantial increase in the number of loans originated, directly contributing to the expansion of the affordable housing sector. By bolstering the Section 184 program and enhancing FHA financing for manufactured homes through the Down Payment Assistance, TREDC's programs will incentivize existing FHA lenders to serve LMI borrowers purchasing manufactured homes and Section 184 lenders to grow their programs. Thus, HUD's support of our programs will catalyze long-term, sustainable change in the housing finance landscape.

Objectives for Manufactured Home Preservation and Revitalization for LMI Tule River Tribal Members

1. Rehabilitate or replace 90 existing manufactured units for LMI Tule River Tribal members on the Tule River Reservation site within 5 years of receiving funding.
 - a. Target: 87 units rehabilitated and 3 units reconstructed within five years

Objectives for the Manufactured Home Down Payment Assistance (MHDPA) Program

1. Provide Down Payment Assistance to 680 low and moderate-income (LMI) families, enabling them to purchase MH's with a fixed-rate 30-year mortgage
2. Target 25% of loans to be issued to Tribal members accessing Section 184 mortgages

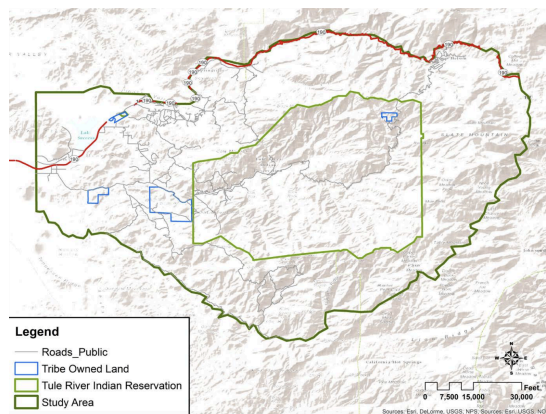
Objectives for the Manufactured Home Earned Equity Program (MHEEP)

1. Enroll at least 165 LMI manufactured homeowners into the Earned Equity Program

Eligible Activities

Manufactured Home Preservation and Revitalization for LMI Tule River Tribal Members

The Tule River Reservation covers over 55,000 acres and includes portions of the Sierra Nevada mountains. The Reservation is approximately 20 miles east of Porterville, in Tulare



County, California's top agricultural production center. Covering almost 85 square miles of largely undeveloped land, the Reservation is currently home to 1,600 tribal members.

The map in the image shows the Tule River Indian Reservation (in light green, which is owned by the Tule River Tribe), along with other land outside the reservation boundaries that is also owned by the Tule River Tribe (blue). The “Study Area” shows the total border inside which the Tule River Indian Reservation and Tribal-Owned Land is located.

Roads within the Reservation boundary are owned and maintained by the Tribe, while roads outside the Reservation boundary are maintained by the County. Properties within the central “Village” are currently connected to a municipal sewer system. Existing wastewater is collected throughout the Village and transported to the treatment plant. Residential units outside

of the Village area rely on traditional septic systems for waste. Southern California Edison is the electricity power provider to the Reservation.

The land on the Tule River Reservation is held in Trust for the benefit of the Tule River Tribe and manufactured homeowners receive a land assignment from the Tribe free of charge. The proposed activities in this plan have been approved by the Tule River Tribal Council, and we have consulted multiple departments on the reservation, including Housing and Land Management. The Tule River Land Management Assistant currently manages the Manufactured Housing program on the reservation and will provide guidance on the work completed on the units. Additionally, we will create a Working Group with members from multiple departments to guide the implementation of activities under this grant.

We plan to rehabilitate up to 90 existing manufactured units, including replacing 3 pre-1976 manufactured units on the Tule River Reservation. The scope of work is based on the top 10 requests from manufactured housing homeowners, adjusted by the percentage of low and moderate-income residents living on the reservation.

From May - July 2024, nearly two-thirds of Tule River Reservation homeowners completed a survey outlining their needs and priorities for preservation and revitalization activities. This needs list was cross-referenced with feedback from members of the Tule River Tribal Council and staff from the Land Compliance, Project Management, and Housing divisions to finalize the highest-priority preservation activities. The highest request among survey respondents and stakeholders from Land Management, the Tribal Council and Housing was to install permanent foundations around the existing manufactured housing units on the Reservation. The next highest priority among respondents was to install more permanent heating/cooling systems, as many households on the Reservation currently use swamp coolers, which are insufficient to cool the homes during intense heat waves. Respondents' third priority was plumbing and electrical work, followed by additional storm mitigation activities, such as repairing roofs, installing gutters and building awnings to prevent rainwater from entering the homes during storms.

Repair Category	% of Units Requesting Assistance	# of Units Requesting Assistance	LMI Weighted # of Units Requesting Assistance
Inspection/Assessment	100%	120	90
Foundation Repair	69%	83	62
Roof and Gutters	45%	54	41
Plumbing	55%	66	50
Electrical	58%	70	52
Heating/Cooling	64%	77	58
Siding	42%	50	38
Awnings	42%	50	38

Reconstruction	3%	4	3
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The initial inspections will include an assessment of the need for cooling and retrofits for extreme heat waves, site assessments for fire preparedness and an evaluation of flood-prone units. Labor to complete the work will be a combination of local vendors and national vendors if local vendors are not available. For roofing, gutters, permanent foundation, siding and windows, we will utilize outside contractors due to a lack of local expertise. Local tradespeople affiliated with the Tule River Reservation and/or in the town of Porterville will be able to complete the awnings, plumbing and electrical work.

The Tule River Manufactured Home Preservation and Revitalization Program is consistent with the following HUD subcategories as described in Section III.F.2.c of the NOFO: 1) Housing and housing-related activities: Repairing, rehabilitating, and reconstructing existing manufactured housing units (Section i.a), Development or improvement of infrastructure to support MHCs and manufactured units: Enhancing the resilience of infrastructure to natural hazards, extreme weather, and disaster events (Section ii.c), Mitigation and resilience activities: Conducting manufactured housing resilience activities (Section iv.a).

Manufactured Home Down Payment Assistance (MHDPA)

Our national DPA program will offer participants two products: the Manufactured Home Repayable Loan and the Manufactured Home Forgivable Loan. These products will be available to applicants of manufactured homes that are affixed to the ground that will be owned by the homeowner (in the case of FHA loans) or owned by the homeowner or by the Tribe (in the case of Section 184 loans). DPA recipients will be supported with credit counseling for at least 6 sessions, which cover topics such as budgeting basics, post-purchase and foreclosure prevention.

MH Repayable DPA Loan

The MH Repayable DPA Loan is a down payment assistance loan with a below-market interest rate equal to the first mortgage rate - 1.0%, with a floor of 4.5% interest. For example, if the first mortgage has an interest rate of 7.0%, then the DPA rate would be 6.0%. Additional details on the Repayable Loan program are below:

- Term: 20 years
- Income limit: 80% of the median income in the area where the home is purchased
- Eligibility requirements: Home buyers using an FHA or Section 184 loan
- DPA percentage: up to 3.5% of the lesser of the purchase price or appraised value
- Minimum borrower contribution: No required minimum contribution
- Affordability Requirements: Home must be restricted as ‘affordable housing’ for a minimum of 15 years

The MH Repayable Loan product is offered at a lower rate than market-rate DPA, which is usually a few points higher than the first mortgage rate. The interest rate floor of 4.5% ensures that we are able to cover loan servicing fees, which are typically \$25/month for performing loans and \$80-90/month for non-performing loans. While typical down payment assistance carries a 10-year term, the MH Repayable Loan is spread over a 20-year term. This lowers the borrower's monthly payment to half the cost of a similar loan with a 10-year term.

MH 0% Interest Forgivable DPA Loan

The MH 0% Interest Forgivable DPA Loan is forgiven if the borrower makes 60 consecutive on-time payments on the first mortgage. During the loan term, the borrower makes no payments on the DPA and accrues no interest. If the borrower makes 60 consecutive on-time payments on the first, the forgivable junior lien is released. If the borrower is late on the first mortgage during the 60-month period, then the principal must be repaid when the borrower sells or refinances the loan. Features of the loan are below:

- Term: 20 years
- Income limit: 80% of the median income in the area where the home is purchased.
- Eligibility requirements: Any Section 184 tribal borrower or home buyer with a credit score of 620 or higher using an FHA loan,
- DPA percentage: up to 3.5% of mortgage loan
- Minimum borrower contribution: No required minimum contribution.
- Affordability Requirements: Home must be restricted as 'affordable housing' for a minimum of 15 years

Our Down Payment Assistance (DPA) program enhances the ability of correspondent lenders to originate more loans for manufactured homes, with a particular emphasis on easing the challenges associated with Section 184 loans. These loans require lenders to develop specific expertise and infrastructure, including manual underwriting processes, which demand significant staff time and management resources. By providing federal funding under PRICE, our DPA program can offer affordable, and sometimes cost-free, loans to tribal borrowers, facilitating lender participation in the Section 184 program by mitigating time and risk. This support is crucial for lenders to either initiate or maintain HUD approval for originating Section 184 loans.

Moreover, the DPA program promotes long-term housing stability for low- and moderate-income (LMI) participants by enabling them to secure fixed-rate, 30-year mortgages. This protects them from the unpredictability of the rental market, ensuring that once they transition to homeownership, they have a stable and secure housing situation.

The DPA Program meets HUD's national impact objective to benefit LMI persons, and it is consistent with HUD's subcategory of "housing and voluntary supportive service activities that support new and existing residents of MH's", which includes DPA in Section III.F.2.c.v.d of the NOFO. Specifically, borrowers will only be eligible for the DPA program if they are 1) at or

below 80% of Area Median Income and 2) are purchasing a Manufactured Home. We also require 15-year deed restrictions on the homes we finance through PRICE funding.

Manufactured Home Earned Equity Program (MHEEP)

For prospective homeowners who are 'almost mortgage ready,' TREDC offers the MHEEP program, a lease-to-purchase arrangement that allows participants to lock in a purchase price, reside in their prospective home, and build credit through regular monthly lease payments over a period of up to 10 years. Participants then have the option to buy the home at any point during the lease. This setup not only stabilizes their housing situation but also prepares them for future homeownership by allowing them time to improve their credit scores over time. Furthermore, the tenants' on-time rental payments are reported to credit bureaus, allowing them to slowly build their credit through participation in the MHEEP program.

In Phase I, a subsidiary of TREDC, the Tule River Homebuyer Earned Equity Agency (TRHEEA), purchases the home on behalf of the tenant with a 3.5% down payment funded by this PRICE grant and utilizes an FHA loan for the remaining purchase price. Simultaneously, TRHEEA extends a 10-year lease option to the tenant, which allows the tenant to exercise an option to purchase the home at the price of the remaining principal balance at any time during the 10-year period. The tenant's lease payment is based on the debt service payment for the FHA loan. A portion of each lease payment is then credited towards the future purchase of the home during the lease period, according to the corresponding principal balance that the tenant contributes based on the amortization schedule of the FHA loan. In other words, every dollar contributed by tenants during their lease term is credited toward their future purchase of the home. Tenants are supported during this period with free credit counseling for at least 6 sessions, which cover topics such as budgeting basics and pre-purchase counseling.

In Phase II, the tenant purchases the home and either assumes the FHA mortgage from TRHEEA or refinances with a new loan. At the moment the tenant converts to homeownership, TRHEEA passes along a no-cost 3.5% grant to the homeowner (which does not need to be repaid), corresponding with TRHEEA's contribution on behalf of the borrower/tenant in Phase I of the EEP program.

The Earned Equity Program ensures long-term housing stability for participants due to its extended lease duration—initially 10 years with optional 5-year extensions whereupon a lease renewal is granted for up to a total of 40 years—and fixed rental prices throughout the lease period. Additionally, all Earned Equity homes funded under the PRICE program will be deed-restricted as affordable housing units for at least 15 years. Eligibility for the Manufactured Home EEP will require that participants are at or below 80% of the Area Median Income.

The Earned Equity Program aligns with HUD's national impact objectives by targeting LMI persons and is consistent with the following HUD subcategories as described in Section III.F.2.c of the NOFO: 1) Acquiring affordable manufactured housing units or utilizing construction methods such as modular housing, 2) Assisting manufactured housing renters and homesite renters seeking to become homeowners through land and site acquisition, 3) Supporting

new and existing residents of manufactured homes with housing and voluntary supportive service activities.

Our financing programs are not specifically reserved for households assisted under other HUD affordable housing programs such as eligible Housing Choice Voucher (HCV) recipients or the Indian Housing Block Grant (IHBG), however participation in other HUD programs will not prevent participants from also enrolling in our programs.

Timelines and key tasks are listed on the following page.

Goal 1:		To enhance the quality of life and housing stability for Tule River Tribal community members through the revitalization of existing manufactured housing on the reservation.		
Objective 1.1: Tule River MH Unit Revitalization		Renovate or reconstruct 90 manufactured units for LMI Tule River Tribal members on the Tule River Reservation by the end of the program period.		
Strategy 1.1		Revitalize and replace affordable manufactured homes for Tule River Tribal members.		
Activities/Key Tasks		From/To	Responsible Party	Outputs
1	Conduct inspection of existing manufactured housing units	June 1, 2025- October 31, 2025	Inspectors	90 units assessed
2	Relocate affected households to temporary lodging during major renovation	October 1, 2025 - October 31, 2027	Administrative personnel, project managers	3 families relocated
3	Complete rehabilitation work	December 1 2025 - September 20, 2032	Project managers, vendors	90 units rehabilitated

Goal 2:		Increase homeownership rates among low and moderate-income families across America by providing accessible financing options for purchasing manufactured homes.		
Objective 2.1: Down Payment Assistance		By the end of the program period, provide down payment assistance to at least 680 low and moderate-income (LMI) families, enabling them to purchase manufactured homes.		
Objective 2.2: Down Payment Assistance		Target 25% of loans to be issued to Tribal members accessing Section 184 mortgage loans		
Strategy 2.1:		Increase homeownership among LMI families through financial assistance		
Activities/Key Tasks		From/To	Responsible Party	Outputs

1	Solidify relationships with Section 184 Correspondent Lenders	June 1, 2025 - October 1, 2025	TREDC administrative personnel, Program Manager	At least one new correspondent lenders enrolled who focus on issuing Section 184 Loans
2	Develop and disseminate information on DPA eligibility, application process	Rolling basis from June 1 2025- September 20, 2032	Correspondent lenders: Mortgage Loan Officers	1200+ LMI prospects reached
3	Process DPA applications	Rolling basis from July 1 2025- September 20, 2032	Correspondent Lenders: Mortgage Loan Officers	700+ DPA applications processed
4	Distribute funds to qualified applicants	Rolling basis from July 1 2025- September 20, 2032	TREDC administrative personnel	680+ DPA approvals and funds disbursed
Objective 2.3: Earned Equity Program		By the end of the program period, enroll at least 165 participants in the Manufactured Housing Earned Equity Program.		
Objective 2.4: Earned Equity Program		Ensure that at least 20% of participants in the Earned Equity Program improve their credit scores to mortgage-ready status within the program term.		
Strategy 2.2		Facilitate transition from renting to homeownership for individuals with poor credit.		
Activities		From/To	Responsible Party	Outputs
1	Identify and enroll eligible participants through partnerships with lenders	Rolling basis from June 1, 2025- September 20, 2032	Correspondent lenders: Mortgage Loan Officers	300+ participants referred to EEP program
2	Close on Earned Equity Transactions	Rolling basis from September 1, 2025- September 20, 2030	Arrive Home administrative personnel	165 EEP transactions closed
3	Provide credit counseling to tenants	Rolling basis from June 1, 2025- September 20, 2030	HUD-certified credit counselors	30% of tenants enrolled in counseling complete at least 3 counseling sessions

Projected Impacts

By mobilizing over \$200 million in private capital through FHA and Section 184 lenders, this project significantly increases the economic impact on low-income and tribal communities nationwide. This funding not only addresses the initial financial barriers to homeownership but also ensures that once these barriers are overcome, the beneficiaries are equipped to sustain homeownership without further federal assistance.

Quantitative Impact Estimates:

- 935 families and individuals directly assisted through financial and housing programs by the end of the project timeline.
 - 680 LMI families directly assisted through Down Payment Assistance
 - 165 LMI families assisted through the Earned Equity Program
 - Repair and preservation of 90 Tule River Reservation manufactured homes, including reconstructing 3 manufactured homes

Affordability and Activities and Actions that do not violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964

Our approach to ensuring the availability of affordable manufactured housing for LMI households focuses on providing affordable financing options that support full ownership of both the land and the home, employing restrictive covenants to ensure these homes remain affordable for at least 15 years, and offering long-term leases with no-rent increase extensions of up to 40 years.

Our two financing programs—Down Payment Assistance and Earned Equity— only lend against manufactured homes secured to the land (which are considered real estate, rather than personal property). By financing manufactured homes that are considered ‘real property’, we ensure that homeowners gain full ownership and control over both their homes and the land.

To maintain affordability and prevent speculative gains, we will implement a 15-year deed restriction on all properties directly financed under these programs. This restriction will be recorded as a covenant on the property’s deed, legally binding the following terms:

- Modest Home Price: for the DPA program, we will only finance modest housing with purchase prices not exceeding 95% of the median purchase price in the area
- Price Caps: We will limit the appreciation of the resale price to no more than 2% per year for the first 15 years, ensuring that homes remain affordable to future LMI buyers while generally tracking with the pace of inflation.
- Resale Conditions: The resale of properties will be strictly conditioned to require that homes remain affordable to income-qualified buyers and continue to serve LMI households who earn less than 80% AMI.

In the MHDPA program, we utilize zero-interest loans and below-market interest rates with longer terms to match the first-position mortgage. While typical down payment assistance carries a 10-year term, the MH Repayable Loan is spread over a 20-year term which lowers the borrower's monthly payment to half the cost of a similar loan with a 10-year term. Families utilizing the 0% Interest MH Forgivable Loan will not need to make a payment on the DPA at all, and will only need to repay the principal at the moment they sell or refinance the property if they become delinquent on their first-position mortgage loan.

In MHEEP, tenants enter into a long-term renewable lease structure with no price increases during the term. The lease starts with a 10-year term, followed by options for five-year extensions at the same rental price. The EEP lease operates similarly to a 40-year amortized loan. The portion of the monthly payment that would be considered a principal payment on a 40-year amortized loan pays down the Option Price. After 40 years, the home is paid in full and can be deeded over to the buyer, even if they never formally execute a Purchase and Sale Agreement or take a mortgage into their name.

Encouraging the ownership of the land is a pivotal element of our strategy to enhance financial security for LMI households who are not living on Tribal reservation land. Owning the land mitigates the risk of displacement due to land sale or lease termination—a prevalent issue in manufactured housing communities where residents own their homes but not the land. All the homes we finance in collaboration with FHA mortgages feature land ownership for the residents.

For manufactured home preservation and revitalization activities on the Tule River Reservation, the Tule River Tribe offers land assignments at no cost to residents, whether they are homeowners or renters.

Outreach to LMI Households:

Our advertising campaigns are designed to reach all eligible households, consistent with federal anti-discrimination laws (including Title VI of the Civil Rights Act of 1964), featuring a broad range of participants without unlawful preference. This is visible across all media platforms, including print, online, and broadcast media. Marketing materials are offered in multiple languages to be accessible to those with limited English proficiency. Beyond our current correspondent lender network, we will also solidify partnerships with new correspondent lenders who specialize in Section 184 loans to deepen our outreach in Tribal communities across the US.

To specifically reach Tribal communities, we will advertise our nationwide DPA and EEP offerings via Tribal-specific media channels such as KSUT Tribal Radio and Native Public Media. We will also target print media such as National Native News, Indian Country Today, and High Country News.

Resident Protections - Earned Equity and Down Payment Assistance

Our Earned Equity and Down Payment Assistance Programs offer protections for residents and borrowers that align with federal civil rights laws, including the Fair Housing Act,

Fannie Mae or Freddie Mac tenant protections, The White House Blueprint for a Renters Bill of Rights, as well as state, local, or Tribal laws and regulations.

In the Earned Equity Program, the long-term lease is recorded with the county as a Memorandum of Long-term Purchase Agreement, providing official acknowledgment with the local government. Tenants have the right to sublease their properties while continuing to make lease payments. Additionally, residents have the right to purchase their homes at any time they qualify for a mortgage. Finally, we also offer three free credit counseling sessions, covering topics such as pre-purchase/mortgage readiness counseling, budgeting basics, and home maintenance, provided by HUD-certified credit counselors.

For financial hardship support, we provide a minimum of 30 days' notice before considering an Earned Equity account delinquent, allowing time for residents and borrowers to address any financial challenges. If the borrower is still delinquent after 30 days, we offer an additional 15 day cure period, along with free credit counseling with our HUD-certified credit counselors on foreclosure and eviction prevention. We will consider partial payments and payment plans to assist borrowers with short-term financial hardships.

The DPA loans follow FHA and Section 184 default mitigation and foreclosure requirements.

Our Earned Equity and Down Payment Assistance programs do not involve displacing residents. However, the renovation work we do on Tule River Tribal land may necessitate temporary resident relocation. We will provide these residents with up to 3 months of temporary housing to ensure minimal disruption.

Our protections for both renters and borrowers are based on the most stringent interpretations of applicable laws and regulations, including FHA and Section 184 default mitigation and foreclosure requirements, federal civil rights laws, and state, local, or Tribal laws. By adhering to these standards, we ensure that our programs are compliant and set benchmarks for safety, security, and support within the housing sector.

Resident Protection - Tule River Reservation

Prior to being eligible for a tribal housing program or HUD assistance, Tule River tribal members must have a valid ½ acre land assignment, granted from the Tribal Council through the Land Management Department. If the land is accessible with a road and utilities, then the land is assigned to the member free of charge. The land is held in a Trust, never charged and passed intergenerationally from families to their children and grandchildren. For prospective homeowners, the Tule River Tribe also purchases the home and issues a 0% interest mortgage loan to the homeowner. The term of the loan is based on the homeowner's income, and most loan payments are about \$500/month.

Under the terms of the mortgage agreement, homeowners who fall behind on payments for more than three months are subject to foreclosure, which would result in the loss of both the home and the land assignment. To date, the Tule River mortgage program has not resulted in any evictions due to non-payment.

Encouraging Access to Resources and Financing

Our programs are especially beneficial for lower-income individuals without sufficient savings, as they decrease the need for upfront capital. The MHEEP program provides a path for individuals who are near mortgage-ready but are hindered by low credit scores and lack of sufficient savings. Because the MHDPA and MHEEP program lower the threshold for LMI families to purchase a home, our programs allow families who are living in overcrowded homes or apartments to transfer into a single family residential manufactured home.

Additionally, any new construction required because a manufactured home was built prior to 1976 will comply with the Americans with Disabilities Act (ADA) to ensure that renovated units are accessible for individuals with disabilities. This may include features like wheelchair access, adaptable kitchens and bathrooms, and other necessary modifications. We will also evaluate existing structures for ADA compliance retrofits on a case-by-base basis, as many people living in MH homes on the Tule River Reservation are elderly.

For the Manufactured Home preservation and revitalization project located on Tule River land, our proposal involves rehabilitating existing manufactured housing in the Village core and in surrounding areas, which is centrally located in the Tule River reservation and closest to the senior center, health clinic, and Towanits Indian Education Center.

The City of Porterville currently operates service to and from the Reservation seven days a week. Route 9, a fixed route service, operates between 6am and 10pm on weekdays and between 8am to 6pm on Saturdays and Sundays. The Tribe is in the process of implementing a shuttle circulator service within the Reservation that would coordinate with the proposed Porterville Transit Route 9 by reaching areas further into the Reservation with door-to-door service.

As a Tribal applicant, the Tule River Economic Development Corporation is committed to the economic and social upliftment of the Tule River community members. Our project aims to provide preferences in employment and business opportunities for Tribal Members and Tribal organizations, consistent with Section 7(b) of the Indian Self-Determination and Education Assistance Act and 24 CFR 1003.510. Specifically, we prioritize hiring tribal members for all new positions created by our projects, from construction jobs to long-term roles in property management and administrative roles. Additionally, we actively seek partnerships with tribal-owned businesses during the renovation phase and for ongoing service needs, ensuring that a portion of our project budget supports the tribal economy. Finally, we are collaborating with the Tule River Tribal Council to establish an apprenticeship program, which would provide workforce training to young people interested in learning how to renovate manufactured homes on the reservation.

Environment and Resilience

Tule River MH Preservation and Revitalization Program

The Tule River Reservation is identified by the Climate & Economic Justice Screening Tool as at high risk for natural hazards, ranking in the 93rd percentile for projected wildfire risk and the 83rd percentile for projected flood risk. Additionally, its risk level is relatively high according to the Federal Emergency Management Agency (FEMA) National Risk Index, scoring 95.77 compared with an overall percentile rating of 51.70 for the rest of California.

Tulare County rates “relatively high” (98.2 and 97.6, respectively) for riverine flooding and wildfire risk and “very high” (99.7) for heat waves. Beyond this, Tulare County has a “very high” social vulnerability score, which measures the susceptibility of social groups to adverse impacts of natural hazards, including disproportionate injury, loss, or disruption of livelihood. Additionally, the Tule River Reservation scores “relatively high” for the National Risk Index-Expected Annual Loss. Finally, FEMA’s Community Resilience Challenges Index rates Tulare County at an 81 out of 100, indicating high challenges to community resilience. Specific CRCI risk indicators relevant to this PRICE proposal are below.

Indicator	Tule River Reservation	Tulare County	US Population Average
Median Household Income	\$43,750	\$57,394	\$69,021
Poverty Level	32.5%	19.8%	12.6%
Percentage of Mobile Housing Units	27.1%	6.3%	5.9%

Tule River Reservation’s low median household income, high poverty rate, high percentage of mobile housing units and very high social vulnerability score means that families living on the Reservation need a high level of economic support to complete repairs and climate resilience activities for their homes due to their limited savings and budgets for capital improvements. Populations with high levels of poverty and high social vulnerability have a particularly difficult time preparing for, responding to, and recovering from disasters.

Our preservation and revitalization plan prioritizes multiple mitigation strategies to address risks from the top natural risks for Tulare County: fire, flooding, and excessive heat. We will implement the following six (6) activities as part of our preservation and revitalization efforts on the Tule River Reservation.

1. *Assess the Need for Passive and Active Cooling and Resilience Retrofits in Manufactured Homes:*
 - **Hazard:** Extreme Heat
 - **Action Type:** Capacity Building, Capital Improvements

- **Description:** Assess and identify the need for cooling systems and resilience retrofits to enhance the safety of residents during extreme heat events. This assessment will be completed as part of the initial property inspections.
- 2. *Conduct Site Assessments for Effective Vegetation Management and Fire Preparedness:*
 - **Hazard:** Wildfire
 - **Action Type:** Capacity Building, Capital Improvements
 - **Description:** Perform assessments to ensure proper vegetation management, defensible space creation, and asset hardening to reduce wildfire risk. This assessment will be completed as part of the initial property inspections.
- 3. *Evaluate Flood-Prone Manufactured Housing Units for Flood Mitigation Opportunities:*
 - **Hazard:** Flooding – General, Rainfall-induced
 - **Action Type:** Capacity Building, Capital Improvements
 - **Description:** Identify flood-prone areas and to prioritize flood mitigation efforts for the most at-risk households. Individual properties will be assessed to identify past flooding, especially those without permanent foundations. This assessment will be completed as part of the initial property inspections.
- 4. *Installation of Cooling and Resilience Retrofits for Low- and Moderate-Income Households:*
 - **Hazard:** Severe Weather, Extreme Heat
 - **Action Type:** Funding & Finance
 - **Description:** Install passive and active cooling systems to protect LMI households from extreme weather conditions. The initial inspection reports will identify properties that are currently using swamp coolers and are in need of air conditioning or central heating/cooling. Beyond this, two-thirds of manufactured homeowners surveyed expressed a need for passive and/or active cooling systems.
- 5. *Flood-Proof Existing Structures:*
 - **Hazard:** Flooding – General, Rainfall-induced
 - **Action Type:** Capital Improvements
 - **Description:** Implement flood-proofing measures for existing structures, especially those previously damaged by floods to enhance their resilience. Specific mitigation measures will include elevating homes and installing foundation support. Flood mitigation and foundation support was the most-requested preservation activity among homeowners surveyed, with an astonishing 70% of homeowners requesting this type of assistance.
- 6. *Fund Natural Fuel Reduction Activities Near Manufactured Homes:*
 - **Hazard:** Wildfire
 - **Action Type:** Preparedness & Response, Funding & Finance
 - **Description:** Support activities that reduce natural fuel in fire-prone areas near manufactured homes, such as fire-safe landscaping. We will request renovation

contractors to implement basic fire-safe landscaping in accordance as part of maintenance when deemed necessary.

The outlined approach addresses vulnerabilities faced by LMI families living on the Tule River Reservation by completing necessary work upfront, ensuring that LMI households do not need to save for future capital improvements. Additionally, installing permanent foundations on homes that have been subject to repetitive loss addresses and mitigates future losses because it prevents further sinking/shifting, reduces the risk of water damage during floods, and enhances the overall durability and safety of the homes. This foundation work ensures that the homes can withstand environmental stresses, thereby protecting the residents and their investments from recurring damage and loss.

Community Engagement

As an Economic Development Corporation wholly owned by the Tule River Indian Tribe and governed by a Board of Directors composed of tribal members and local business professionals, TREDC is deeply embedded in the local community. We strive to revitalize our community and enhance the lives of the tribe and its people. To ensure our projects are well-aligned with community needs, TREDC conducts extensive community visioning through participatory meetings.

For this project, TREDC has conducted a series of meetings that have served as a robust community visioning process. These include discussions with:

1. Tule River Housing Authority staff about current projects benefiting LMI residents on the reservation,
2. the Tule River Housing Authority Board to assess local needs on and off Tribal Reservation land for low-rent and LMI ‘mutual self-help’ families living in manufactured homes,
3. The Tule River Tribal Council
4. Correspondent lenders such as Panorama Mortgage Group, Loan Depot, Guild Mortgage, and Security National to expand our Down Payment Assistance and Earned Equity programs to target LMI borrowers,
5. Our current loan servicers to enhance capabilities to service Section 184 loans,
6. Other Tule River Reservation staff, including project management, land management, and construction management teams,
7. Habitat for Humanity affiliates serving minority and low-income communities in the Southeast to discuss needs of low-income borrowers and how to make manufactured homes more accessible to them
8. Porterville Chamber of Commerce regarding micro-market housing needs and apprenticeship/employment opportunities in the Porterville/Tule River area
9. Tulare Chamber of Commerce regarding housing needs and apprenticeship/employment opportunities in Tulare County

10. Congressman Vince Fong, representing California's 20th Congressional District about California's housing shortage and scalable housing solutions to address demand-side solutions

11. Dennis Townsend, District 5 Supervisor for Tulare County, about the housing needs for low-income residents in Tulare County

Furthermore, TREDC administered a community survey online, posted in the Tule River News and made available in the Tribal Administration building to solicit feedback from individual members of the Tule River Tribe throughout May-June, 2024. 68 responses were received, representing two-thirds of manufactured housing owners on the Reservation.

Continuing our commitment to community participation, we hosted a public meeting on July 8 at the Tule River Gymnasium to discuss the planned activities further. This meeting was promoted via social media on the TREDC Facebook page and two of the three Tule River Facebook pages, as well as in the Tule River News. Paper announcements were also displayed in the Tribal Administrative building. Additionally, a representative from the Tule River Indian Housing Authority distributed flyers door-to-door to every manufactured housing resident on the reservation.

Letters of support from Tule County Supervisor Dennis Townsend, Porterville Chamber of Commerce, and the Tulare Chamber of Commerce further corroborate the collaborative nature of our engagement strategy. During the life of the grant, TREDC will maintain this level of meaningful engagement, planning and coordinating preservation and rehabilitation activities for manufactured housing as outlined in our PRICE Application. Feedback from these departments and stakeholders is outlined in Attachment H.

The participatory process allowed us to create a shared vision and project goals focused on revitalizing existing manufactured housing to enhance quality of life and housing stability. The engagement process has been comprehensive, ensuring that many voices have been heard and integrated into the planning of our project.

Future Strategies for Robust Stakeholder Participation

As TREDC continues to advance its mission, we remain committed to fostering broad stakeholder engagement in all aspects of our projects. Looking ahead, we plan to implement several strategies to ensure sustained and effective community involvement:

1. **Establishment of a Working Group:** To guide the implementation of preservation and revitalization activities under this grant, TREDC will establish a multidisciplinary Working Group with members of the Tule River Tribe. This group will include members from the Tule River Land Management, Housing Authority, and economic development sectors. The Working Group will convene monthly to review project progress, discuss community feedback, and adapt strategies as needed to meet evolving community needs.

2. **Continued Community Visioning Sessions:** Building on the success of our initial community visioning process, TREDC will host annual community workshops. These sessions will ensure that our projects continue to align with the needs of the community.
3. **Enhanced Digital Engagement:** Recognizing the importance of reaching a broader audience, we will enhance our digital engagement strategies. This includes the regular updating of our project website, increased use of social media for real-time updates, and virtual town hall meetings to ensure accessibility for all community members, especially those who may face barriers to physical participation.
4. **Feedback Mechanisms:** We will also introduce more robust feedback mechanisms, including digital surveys, suggestion boxes placed in the Tule River Reservation Administration Building, and a dedicated email hotline. These tools will help us gather continuous input from a wide range of stakeholders.
5. **Regular Reporting and Transparency:** Finally, we will maintain transparency through regular reporting to the community. Bi-annual reports will be shared in community meetings and online, detailing project advancements, budget allocations, and future plans. This transparency is key to building and maintaining trust with all stakeholders.

Through these strategies, TREDC aims not only to engage but also to empower the community, ensuring that our projects have a lasting and meaningful impact.

Alignment with Existing Community Plans/Policies

Our proposal for the Tule River Manufactured Housing project aligns closely with the Tule River Indian Tribe's Master Plan and various community plans and policies. Specifically, the preservation and rehabilitation of existing manufactured homes on the reservation and addressing foundational support needs are consistent with the Tribe's comprehensive housing goals and objectives.

The Tribe's Master Plan highlights a significant need for affordable housing on the Reservation, noting a shortage of units and the deteriorating condition of existing housing stock. The plan projects the construction of 692 new housing units over the next 20 years to meet the growing population and housing demands. Our project directly supports this objective by focusing on the preservation and rehabilitation of existing manufactured homes, ensuring that existing housing remains viable and safe for tribal members. Additionally, the housing plan emphasizes the importance of maintaining affordability and quality in housing. Our approach to rehabilitating structurally unsound manufactured homes aligns with these priorities by ensuring that existing affordable homes meet safety standards and achieve resiliency improvements without financially burdening residents.

Ensuring adequate infrastructure is a key objective in the Tribe's Master Plan, with specific goals related to water and sewer capacity, road maintenance, and sustainable utility systems. Our project supports these objectives by addressing the safety, stability and accessibility needs of existing manufactured homes on the Tule River Reservation, thereby contributing to the overall improvement of the Reservation's infrastructure. The Master Plan stresses the importance

of community involvement and the preservation of cultural resources. Our proposal includes engaging with the community through surveys and meetings to ensure that the housing solutions meet the needs and preferences of the members.

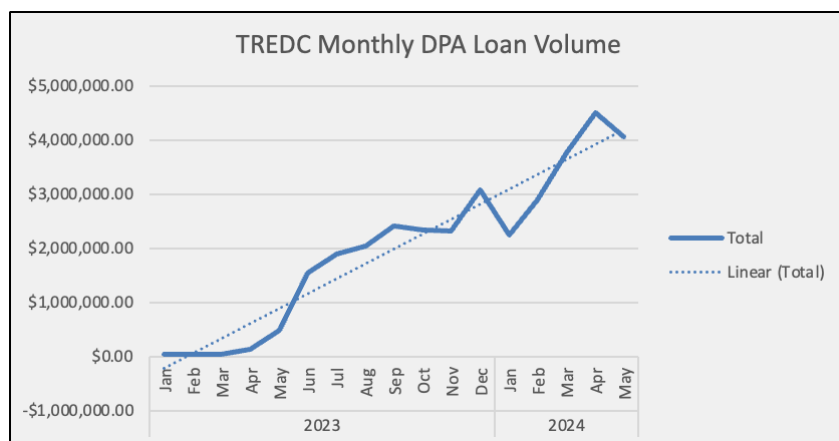
Grantee and Partner Capacity

Experience Managing Projects

TREDC is an eligible source for down payment assistance, and the assistance provided by TREDC conforms with both FHA guidelines (4000.1) and Section 184 lending guidelines. TREDC is also an eligible provider of down payment assistance loans for United States Department of Agriculture (USDA) and its USDA Section 502 Single Family Housing Guaranteed Loans and the Department of Veterans Affairs guarantee program. TREDC operates its nationwide programs in compliance with HUD, FHA, Section 184, USDA, and VA guidelines and takes great care to ensure that the borrowers it assists are capable of sustaining homeownership.

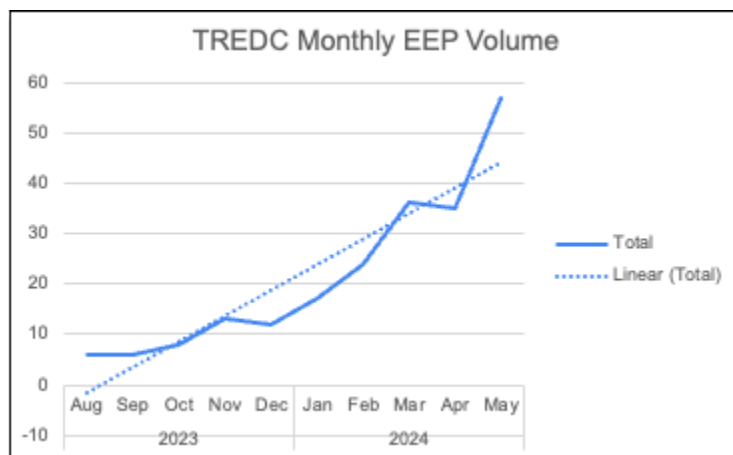
Tule River Economic Development Corporation has the capacity to deploy more than 5x the capital reflected in the budget. This is based on our historical experience issuing Down Payment Assistance and Earned Equity Program transactions and standard linear trend lines.

TREDC currently provides down payment assistance for FHA loans and other affordable housing mortgage loan products to nearly 3,000 qualifying borrowers in 48 states. We have used our unique business structure to offer a national down payment assistance program, where most State Housing Agencies operate only within one state. To date, TREDC and its subsidiaries have issued 2,800 Down Payment Assistance loans at an average of \$11,800 per loan, for a total transaction volume of nearly \$34,000,000. We also currently manage 160 units under our Earned Equity Program, for a total of \$58,000,000 in transaction value. Both programs are offered nationally and are able to be scaled up quickly with additional capital.



Historically, our DPA loan volume has grown at a linear rate. As of May 2024, TREDC originated \$4,000,000/month of DPA loans. Applying our 24 month historical average to forecast future DPA loan originations, we have the capacity to originate \$24,000,000/month of DPA loan volume by April 2030. Historically, 4% of our DPA loan transaction volume has funded borrowers purchasing manufactured homes. Assuming we maintain this rate, we have the capacity to originate \$960,000/month of manufactured home DPA loans by 2030, or nearly

\$40,000,000 of total loan volume over the program period. In total, we anticipate having the capacity to serve more than 3,400 of MH families, representing over \$800M of total mortgage volume. Every dollar in grant assistance that TREDC receives for its DPA program scales up at a 14:1 ratio.



Our Earned Equity Program has been growing at an exponential rate since we began in September 2023. While we originated 35 transactions in April, we had 75 transactions in June, almost double the April figures. To be conservative, we are projecting a linear growth rate for future Earned Equity Program participants. Applying the same 4% manufactured home participation rate vs. all transactions, will have the ability to serve 16 individuals/month by May 2030, or 650 total individuals from October 2024 - May 2030. This represents \$241M of total transaction volume.

Participants in the Down Payment Assistance program and Earned Equity program are referred by our network of 46 FHA-approved correspondent lenders. Our top 10 correspondent lenders include Fairway Independent Mortgage, Movement Mortgage, Guild Mortgage, LoanDepot, Cardinal Financial, New American Funding, American Financial Network, PRISM, SecurityNational and Ruoff. Correspondent lenders who are also approved Section 184 lenders include Fairway Independent Mortgage (all states), Guild Mortgage Company (ND, OR, SD, WA) and Loan Depot (all states). As stated in Attachment B (Affirmative Marketing), for this program we will expand our correspondent lender network to specifically include lenders who focus on, or exclusively work with Tribal members who need Section 184 loans.

Eligibility for our Down Payment Assistance program follows FHA and Section 184 underwriting guidelines. To be eligible for the EEP program, potential clients must have verifiable income but credit scores below 580, making them ineligible for other federally-backed loans. Once a participant selects a manufactured home and signs the lease with an option to buy, TRHEEA acquires the home on their behalf, partially using an FHA or Section 184 loan.

For loan servicing, we use fully licensed loan servicers, including BSI financial for Down Payment Assistance and Essex Mortgage for our Earned Equity program.

Experience with Grant Funds

The Tule River Economic Development Corporation (TREDC) is performing or has performed seven federally funded or non-federally funded assistance agreements within the last three years. Beyond the experience listed below, the Tule River Tribe has experience receiving, managing and expending federal BIA and ICDBG funding. Although it has not previously applied for HUD funding, TREDC is applying for the PRICE award on behalf of the Tule River Tribe because: 1) The scope of work contemplated in the proposal is beyond the geography of the Tule River Reservation. Specifically, the Down Payment Assistance and Earned Equity programs are national in scope and aspire to serve Tribal communities across the nation. While TREDC has experience administering national DPA and EEP programs, Tule River Tribe does not, 2) TREDC specializes in economic development. Our programs generate sustainable income, tap local Tribal and low-income talent, and utilize catalytic private market capital to generate the 14:1 leverage ratio listed in our application.

Previous awards are listed below.

1. DOE: TRT Solar Systems, DE-IE0000183

- The project will install roughly 521 kilowatts (kW) of solar photovoltaic (PV) systems for approximately four tribal commercial facilities to offset 98% of the annual power consumed by these buildings. The project will save the Tribe nearly \$6.6 million over the life of the systems.
- Contact: Project Officer - Josh Gregory, 240-562-1417, josh.gregory@hq.doe.gov

2. EDA Grant: Business Park Infrastructure, 07-01-07953 Tule River

- TREDC was awarded an EDA grant to diversify economic development and create more job opportunities for the tribe and surrounding communities. The grant was awarded for the Project to create the infrastructure for a small business park to serve both the Tribe and the surrounding community.
- Contact: Project Officer - Derek Ulehla, 206-379-2984, dulehla@eda.gov

3. EnergIIZE Commercial Vehicles Project

- TREDC was awarded a grant to deploy ZEV charging/refueling in support of Medium-Duty and Heavy-Duty (MDHD) commercial fleets (class 2b-8).

4. CALeVIP Inland Counties Incentive Program

- TREDC was awarded funding to install electric vehicle (EV) charging stations.

5. San Joaquin Valley Air Pollution Control District - Charge Up! Electric Vehicle Charger Incentive Program

- This rebate program will allow TREDC to purchase and install new EV charging stations.
- Contact: Dante Sanson - dante.sanson@valleyair.org

6. PG&E Electric Vehicle (EV) and Infrastructure Grant

- This grant has allowed TREDC to make \$444,000 in upgrades to its EV charging infrastructure.
- Contact: Jeremy Bartlet - JI13@pge.com

7. GRID Alternatives Inland Empire (GRID) Microgrid Feasibility Study

- TREDC was awarded a grant to complete a site plan feasibility study to determine the viability and potential of implementing a microgrid in its community.
- Contact: Christian Weaver - cweaver@gridalternatives.org

The PG&E Infrastructure upgrades, Grid Alternatives, SJVAPCD and CALeVIP assistance agreements have been completed, while the remaining are in the process of being performed. All federal obligations have been met to date.

Key Staff

Dennis Ickes brings over 15 years of experience in finance spanning various sectors including institutional investment, credit management, and corporate strategy. His background includes serving as VP of Finance at Native 17, where he led funding initiatives for tribal economic development. He was also Second Vice President of Smith Barney, where he managed client assets of over \$25 Million. At TREDC, Dennis ensures our financial strategies are robust and aligned with our development goals.

Jeremiah Nicholas is Operations Manager at TREDC, where he oversees a management team responsible for the daily operations of multiple departments. In his prior role as Marketing Manager, he successfully managed comprehensive marketing strategies for five distinct entities and managed a team responsible for 48 social media platforms. Prior to TREDC, he held management, sales and marketing positions for various organizations.

Rhonda Killian, Project Manager at TREDC, leverages her 20+ years of experience in leading cross-functional teams to ensure our projects are delivered on time and within budget. Her expertise is crucial in coordinating large-scale housing projects, from planning through execution and final reporting.

Partner Organizations

Arrive Home

Arrive Home is a national affordable housing program that provides Down Payment Assistance offerings and alternative credit solutions to aspiring homeowners across the US. Arrive Home is tasked with implementing the day-to-day operations of TREDC's DPA and EEP programs.

Pikes Peak Capital

Founded in 2017, Pikes Peak Capital is a mission-aligned real estate investment manager. The company offers alternative financing to bridge 'missing middle' working class households to homeownership. To date, PPC has bridged over 700 families to homeownership and has transacted on \$125M in 36 states. Over 70% of their mortgage borrowers earn 80% or less of Area Median Income. For this project, Pikes Peak Capital will provide strategic oversight, project management and reporting services to TREDC.

To ensure all partners meet our project standards, TREDC conducts regular review meetings, requiring detailed reports and performance metrics from each partner. Our agreements include specific performance benchmarks that align with project goals, and non-compliance triggers re-evaluation of partnership terms. In case of key staff turnover, TREDC maintains a talent pool of qualified candidates who can fill roles quickly. We also have cross-training programs to ensure that multiple staff members are capable of stepping into critical roles temporarily. For partner loss or underperformance, we engage multiple partners for critical services to ensure redundancy. This mitigates the impact of any single partner failing to meet expectations.

Experience Implementing Programs in Compliance with Federal Anti-Discrimination Laws

At Tule River Economic Development Corporation (TREDC), we are deeply skilled in implementing programs that support lawful access to homeownership in full compliance with Title VI and other federal anti-discrimination laws. Our Earned Equity Program has successfully provided homeownership opportunities to prospective homeowners who are unable to secure conventional mortgages due to credit and other underwriting barriers. By tailoring this program to meet their unique needs, we've enabled these groups to acquire and sustain homeownership. Similarly, our Down Payment Assistance program is designed to reduce the financial hurdles associated with purchasing a home. By offering financial support for down payments and closing costs, we've made homeownership accessible to a broader range of LMI families. The design of the proposed Down Payment Assistance program is a result of stakeholder meetings, interviews with current and prospective homeowners and discussions with non-profit credit counseling agencies familiar with specific barriers that low and moderate income families face in accessing homeownership.

The Tule River tribe faces significant housing challenges, including a high percentage of substandard and aged housing. By collaborating closely with tribal authorities and community members, we've tailored housing solutions that respect and preserve their cultural heritage while

enhancing living conditions. This collaboration includes regular consultations, participatory design processes, and continuous feedback mechanisms to ensure the community's needs and voices are at the forefront of our development efforts.

Experience Completing Environmental Review

TREDC completed the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) environmental reviews on Tule River trust property for a grant we received from the Economic Development Administration in 2023 to create the infrastructure for a small business park to serve both the Tribe and the surrounding community. In order to receive this grant, TREDC performed an Environmental Impact Statement (EIS), following the federal procurement process to find a company to complete the EIS via RFP. After completing the RFP process and hiring the consultant to do the EIS, TREDC then worked with the consultant by having bi-weekly meetings, gathering information, working with subcontractors, working with the Tribe's cultural preservation office, until the EIS was completed.

Cross-Cutting Federal Requirements:

TREDC and the Tule River Tribe are familiar with cross-cutting federal requirements due to our past experience working with federal awards. We are committed to complying with all requirements. Related to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards as outlined in 2 CFR Part 200, we will ensure the following:

- Administrative Requirements: We will maintain robust financial management systems, including internal controls, to manage and monitor the use of federal funds. This includes maintaining accurate records, following procurement standards, and ensuring proper oversight of all financial transactions related to the grant.
- Cost Principles: We will adhere to the principles of allowability, allocability, and reasonableness for all costs incurred under the federal award. All expenditures will be directly related to the project, necessary for the performance of the grant, and consistently treated across all funding sources.
- Audit Requirements: We will comply with audit requirements by ensuring that we have regular, independent audits conducted in accordance with the standards set forth in 2 CFR Part 200 Subpart F. These audits will help verify that federal funds are used appropriately and in compliance with all applicable regulations.

Fair Housing and Nondiscrimination Requirements:

Additionally, we are dedicated to promoting fair housing and nondiscrimination in all our activities. We will comply with all applicable federal laws, including:

- Fair Housing Act (42 U.S.C. 3601-3619 and 24 CFR Part 100): We currently do, and will continue to ensure, that no person is discriminated against based on race, color, national

origin, religion, sex, familial status, or disability in any housing-related activities. This includes ensuring equal access to housing opportunities and services for all eligible individuals.

- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794 and 24 CFR Part 8): We will ensure that our programs are accessible to individuals with disabilities and provide reasonable accommodations as needed.
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d and 24 CFR Part 1): We currently do, and will continue to ensure, that no person is subjected to discrimination under any program or activity receiving federal financial assistance based on race, color, or national origin.

Additionally, TREDC is committed to complying with Section 3 requirements (24 CFR Part 75), which aim to ensure that employment and other economic opportunities generated by HUD financial assistance are directed to low- and very-low-income persons, particularly those who are recipients of government assistance for housing.

- We will prioritize the hiring of Section 3 residents for any job openings related to the project.
- We will ensure that eligible Section 3 businesses are given priority for contracts funded by HUD assistance.

TREDC will also adhere to the Build America, Buy America Act when necessary, which mandates the use of American-made materials and products in federal projects.

- Use of Domestic Materials: We will ensure that all iron, steel, manufactured products, and construction materials used in the project are produced in the United States.
- Compliance and Verification: We will maintain documentation and verification processes to confirm compliance with this requirement, ensuring transparency and adherence to federal guidelines.

Finally, TREDC will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as outlined in 49 CFR Part 24. We will ensure the following:

- Relocation Assistance: We will provide fair and equitable treatment for persons displaced by federally assisted projects, offering relocation assistance to ensure that displaced persons receive adequate housing and other assistance.

Stakeholder Engagement and Public Participation Summary

Summary of Public Participation Process:

To ensure this project is well-aligned with community needs, TREDC conducted a series of meetings with various members of the community. These included discussions with:

- Tule River Housing Authority staff about current projects benefiting LMI residents on the reservation, the Tule River Housing Authority Board to assess local needs on and off Tribal Reservation land for low-rent and LMI 'mutual self-help' families living in manufactured homes
- The Tule River Tribal Council
- Correspondent lenders such as Panorama Mortgage Group, Loan Depot, Guild Mortgage, and Security National to expand our Down Payment Assistance and Earned Equity programs to target LMI borrowers,
- Our current loan servicers to enhance capabilities to service Section 184 loans,
- Other Tule River Reservation staff, including project management, land management, and construction management teams,
- Habitat for Humanity affiliates serving minority and low-income communities in the Southeast to discuss needs of low-income borrowers and how to make manufactured homes more accessible to them
- Porterville Chamber of Commerce regarding micro-market housing needs and apprenticeship/employment opportunities in the Porterville/Tule River area
- Tulare Chamber of Commerce regarding housing needs and apprenticeship/employment opportunities in Tulare County
- Congressman Vince Fong, representing California's 20th Congressional District about California's housing shortage and scalable housing solutions to address demand-side solutions
- Dennis Townsend, District 5 Supervisor for Tulare County, about the housing needs for low-income residents in Tulare County

Furthermore, TREDC administered a community survey online, posted in the Tule River News and made available in the Tribal Administration building to solicit feedback from individual members of the Tule River Tribe throughout May-June, 2024. 68 responses were received, representing two-thirds of manufactured housing owners on the Reservation.

Continuing our commitment to community participation, we hosted a public meeting on July 8 at the Tule River Gymnasium to discuss the planned activities further. This meeting was promoted via social media on the TREDC Facebook page and two of three Tule River Facebook pages, as well as in the Tule River News. Paper announcements were also displayed in the Tribal Administrative building. Additionally, a representative from the Tule River Indian Housing

Authority distributed flyers door-to-door to every manufactured housing resident on the reservation.

Letters of support from Tule County Supervisor Dennis Townsend, Porterville Chamber of Commerce, and the Tulare Chamber of Commerce further corroborate the collaborative nature of our engagement strategy. During the life of the grant, TREDC will maintain this level of meaningful engagement, planning and coordinating preservation and rehabilitation activities for manufactured housing as outlined in our PRICE Application.

Specific Community Feedback:

Sabino Martinez, Tule River Tribe, Project Manager

- The Tule River Tribe has two housing programs relevant to Manufactured Homes:
 - Tribal Council project which is run by Land Management
 - Tule River Indian Housing Authority (TRIHA) program, which specifically focuses on very low-income housing for renters
- Since the Tule River Tribe has two authorities over housing, my advice is to initiate a Land Management (Tribal Council) + Housing (TRIHA) Working Group to plan and coordinate manufactured housing preservation and rehabilitation activities that are granted under the PRICE Application.
- In general, manufactured homes on the reservation are dated and need to be upgraded to be energy efficient. A lot of the units have wood burning stoves.
- In March 2023 there was catastrophic flooding on the reservation - the integrity of the manufactured housing units were beat up quite a bit. It caused erosion which unsettled the units, even 'newer' units which should not otherwise need extensive remediation
- Biggest current needs for manufactured homes
 - Foundation support - native soil has a lot of erosion and settling. The integrity of the units has been compromised over time. In the recent past, it was \$50k to repair the foundations and put in support jacks. Repairing and supporting these units' foundations will be extremely important for flood mitigation. I recommend you contact Tribal maintenance for some old quotes/invoices to double-check the prices
 - Climate control: There is a need for air conditioning, they still have swamp coolers
 - Mold/flood damage

- Electrification - electrical panels are dated, need to be upgraded
- Roofing (decades old, needs repair)
- Siding
- Septic and sewer, some are operating off of a well
- Current maintenance and renovation responsibility
 - Land Management - all units (owner occupied and tenant-occupied) place the responsibility on the occupants to maintain the manufactured homes, including foundation, roof, and other routine maintenance
 - Tule River Indian Housing Authority - TRIHA is responsible for the ongoing maintenance of all units (owner-occupied and tenant occupied). TRIHA receives some grant funding for this ongoing work via the ICDBG. This is only applicable to rental housing and there are no manufactured homes under TRIHA's jurisdiction
- Housing authority is the best point of reference for getting the cost of a full rehab or partial rehab, since they just completed a few renovations for the units they manage.

Vernon Vera, Tule River Tribe, Tribal Council Member

Prior to my being on Council I worked as Tribal Planner and during that time I have become familiar with HUD grants, as well as others...Dept of Justice, EPA, Dept. of Transportation, BLM and some state transportation grants.

The Tule River Tribe is in need of funds to support a number of failing or near failing mobile homes - some will need to be replaced. I can assist with conducting an inventory of our present needs.

The biggest need for existing manufactured housing units is foundation repair. Many homes were placed directly on the clay soil and have experienced erosion. Many have water damage and mold from the large flood in March 2023.

Also, I have been discussing the potential of initiating a vocational program to train tribal members in manufactured home construction – the tribal council will definitely support this component. We have discussed potential sites and have narrowed down to (2), which are promising....we would like to know if a portion of the funding would support construction of a building...if not, then we would invite further discussion of options. A tribal match could be an option, along with land contribution...the bottom line is that an estimated (600) homes need to be constructed over the next ten years (or more) to address our growing housing shortage...this is a great opportunity to address our housing needs...

Antoinette Hunter, Tule River Tribe, Land Assignment Compliance Officer

There are currently about 120 manufactured units on the Tule River Tribal land, which are under the jurisdiction of Tribal Land Management. All of these properties are owner-occupied with loans up to \$150,000 provided by the Tule River Tribe under a legal structure similar to a contract for deed (in which the deed transfers over to the homeowner after the final loan payment). Today, there are only 3-stick-built homes that are owned by homeowners and the rest are manufactured homes, since manufactured homes are so much cheaper than stick-built homes. The homes are scattered across the entire reservation.

All rental units on the reservation are managed by the Tule River Indian Housing Authority, which is separately funded by ICDBG and other sources. All rental units are stick-built homes.

Most of the homeowners on the reservation are <80% AMI, and some of them use almost their entire tribal subsidy allocation for housing expenses, leaving very little for maintenance or utilities. Homeowners are responsible for ongoing maintenance on the properties once they move into the units. The Tribe doesn't have any funds available to help homeowners with ongoing maintenance, except that homeowners can apply for a personal loan from the Tribe. But they still have to pay those loans back. Aside from that, the Tribe has a blanket homeowners insurance plan for all the manufactured homes on the reservation, which covers catastrophic damage from flooding and other extreme weather events.

The biggest preservation needs for manufactured homes on the Tule River Reservation include:

- Repairs for general wear and tear
- No permanent foundation - settling, ground shifting. Some units get flooding under the homes which rapidly deteriorates them
- Homes are not required to have sprinklers for fire mitigation. It would be good to have those installed

Number of units needing maintenance

- 5-10% of the units (6-12) are in such disrepair that they might need to be condemned
- 2-5 units need general repair for moderate damage
- 50% of units do not have a permanent foundation and have flooding-related issues.

Do they have any recent invoices or inspection reports that would give us an idea of the per unit cost?

- Mike Tyler - Development Manager, manages housing maintenance person for Tribe, will be able to give us some advice on general maintenance. He coordinates with external 3rd party contractors
- After the big fire last March, there was an environmental interior/exterior walk-through of the units. Repair quotes were followed up by Service Master.

- General advice: involve Tribal planning department in the working group. The Tribal planning department gets planned home sites together, coordinates bus transportation and works with the emergency department
- The Public works department works with the environmental department to do environmental assessment. Carrie Vera is the Director of the Environmental Department
- Recommended outreach - check time, tell residents they have to fill out the survey in order to get the check. It is also useful to use social media.

Mike Tyler, Development Manager, Tule River Tribe

Previous repairs/maintenance on manufactured homes

- One was completed last year, total cost was \$160,000 for labor and materials. Property was completely gutted from the subframe up through the roof.
- 2 years ago there was a permanent foundation \$14,000 for the foundation and \$4500 for the plumbing and electrical.
- In his opinion, 20-30% of the homes are condemnable

Experts who currently do the work

- Qualified people, not necessarily licensed contractors. Tradesmen.
- Roofing, gutters, permanent foundation, windows- we would need outside contractors due to the technical aspects. Mold mitigation would need to be done by a licensed contractor and the mold would need to be disposed of off-reservation.
- Tradespeople could do the siding, porches

Assessment of foundation damage, general wear and tear

- Permanent foundation - \$20,000- \$23,000. Only 10 properties have a permanent foundation, the rest need it.
- Water intrusion that leads to mold. The homes don't have awnings, so the water comes straight through the doors and leads to structural issues. 30% or more of the mobile home stock may require mold mitigation (subfloor repair, cabinetry, drywall, mold and mildew under the home and attached to the home and subfloor) but we're not entirely sure. Est. \$85,000- \$90,000. You have to rip everything out to the studs and build it back.
- New siding and windows - \$19,000 for siding, windows and paint. If you put in a new sliding glass door, you'll add \$5200-\$5500 (nature of construction of the homes). Windows are installed over the siding not under, once you break the seal you need to replace.
- Roofs and gutters - \$15,000 for roof repairs and \$3,000 for a mobile home. \$9/linear foot. 95% of homes need gutters, 60% needs roofs. 3 tab shingle with a 15 year wear life. Most are approaching or exceeding that.

- Porch/awning to mitigate windblown rains - 8-12 awning, \$8500 expense for front and back. At least 75% of the units need awnings. This fix would eliminate 40% of the water intrusion into the homes.

Khristina Tyson, Tule River Indian Housing Authority, Maintenance Clerk

My name is Khristina, and I'm the Maintenance Clerk for TRIHA. I currently live in one of the manufactured homes on the Tule River Reservation.

There are currently about 150 manufactured units on the Tule River Reservation.

When the South Fork Tule Storm hit last year, we (TRIHA) assessed 18 mobile homes. 5 were determined as a total loss, 4 homes were determined to have over \$25,000.00 worth of damages, and 3 were 1970-ish model mobile homes. I don't know if you consider a home that has mold unlivable but some homes had mold as well. 2 of those homes were not included in the previous numbers.

These are only homes assessed with damages made specifically by the storm. I can't imagine the numbers if we assessed ALL of the mobile homes on the reservation.

We have a good handful of families living in those types of recreational vehicles, and most of them are falling apart. Some even have elders residing in them. There are roughly 25 recreational vehicles that are being lived in on the reservation. This includes RVs, travel trailers/trailers, and 5th wheels.

Community Survey Results - 6/1/24 - 7/8/24

1) If TREDC were to receive a grant to preserve or repair manufactured homes on the Reservation, what do you believe would be the biggest priority? (List examples...replacement, major repair, site problems)

64 responses

Repairs

Tribal members with damaged homes and have not yet received help from the tribe.

Reinforcing the floors from years of wear and tear. The floor boards feel like they only have a few years left before they completely cave.

Ac water mold damage electrical plumbing and siding

Heating/cooling system repair

Roof and flooring

Elders

Bernice McDarment

Housing condition air plumbing

Restoration

Walls and floors

Yes

Biggest Priotity should be the families who need help the most

Repairing all the homes

Structure maintenance

Mobile homes

This can help out a lot with my tribe

Exterior

Yes

Central heating and air conditioning

Solar panels and solar power plus back-up batteries for homes or solar field

Cabinet replacements, water damage repairs

Repairs and roofing, add one when families are getting bigger

Major repairs, and site problems

Water and sewer hook ups.

Roof, windows, Ac maintenance, flooring, skirting vents, new facilities, toilet bathtub

Mold removal, major repairs to restroom, plumbing repairs, roofing, siding, double panels windows/sliding

Air conditioner needs replacement and all carpet removed and replaced with wood floors

Roofing, wiring and ac units

Repair all of my doors and windows reinsulate the bottom of my house

Replacement

Repairs especially for those who have paid their homes off

major repairs

Replacement, major repairs

Repair, upgrade windows, doors, access, foundation

Major repairs - windows, flooring, restrooms, skirting

Major repair

Making sure that mobile homes are still level from ground settling overtime

Major repairs

Elders houses being fixed and making them accessible to the elders specific needs

Replacement

People who need homes.

Major Repair

Water electricity hookup repair, repair on house for living environment in your house.

Flooring , cooling , roofing

Repairs

Year of home and base it on NEEDS not wants. For example a new roof, updated windows, updated furnace and air conditioning, siding and installation of gutters to avoid dry rot.

Roofs, home appliances

People that need help not pick and choose mold, bathroom issues, that were never fixed roofs ,foundation ,doors ,windows , ramps for elders and handicap, floors.

Site problems. The dirt under my double wide is always settling. This means every year me and my husband get under the house and adjust all the Jack's. I would love to get cement strips poured under the house for a foundation. The house moves so much I worry that it might split apart.

Replace if the home is in very bad condition

Replacement and repairs

Electronically repair, bath room sink repair and toilet, roof needs update, windows need up to date. Heating and cooling

Major repairs and replacement

Making it a safe and efficient house

Electrical repair and major home repairs, replacements too

Renovation, repairs and replacement of existing manufactured homes.

Major repair and site problems

Flooring roof's electric cabinets plumbing door frames releveled

Windows/sliding glass doors, AC heating unit, foundation, plumbing, roof

Update kitchen assembly, bathroom remodel, swamp cooler installation, remodeling of flooring for needed carpet, heating and cooling HVAC. Water heater closet restoration for black mold.

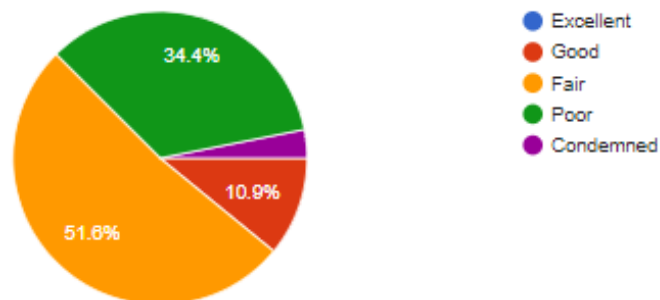
Replacement and/or major repairs

Roof, floors, cabinets, skirting and ac

2) How would you rate the current condition of your manufactured home?

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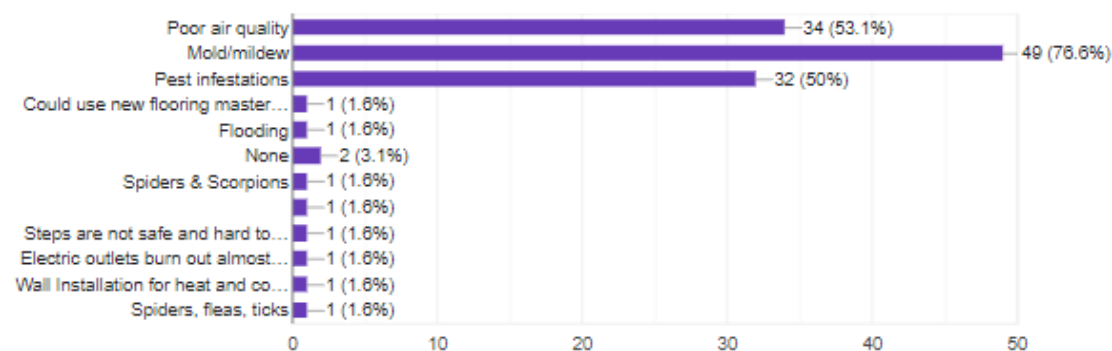
64 responses



4) Have you experienced any of the following environmental or health hazards in your home? (Select all that apply)

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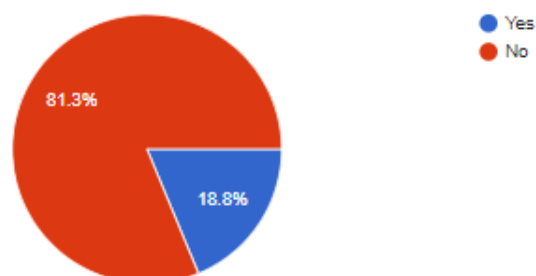
64 responses



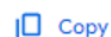
5) Was your manufactured home built prior to 1976?

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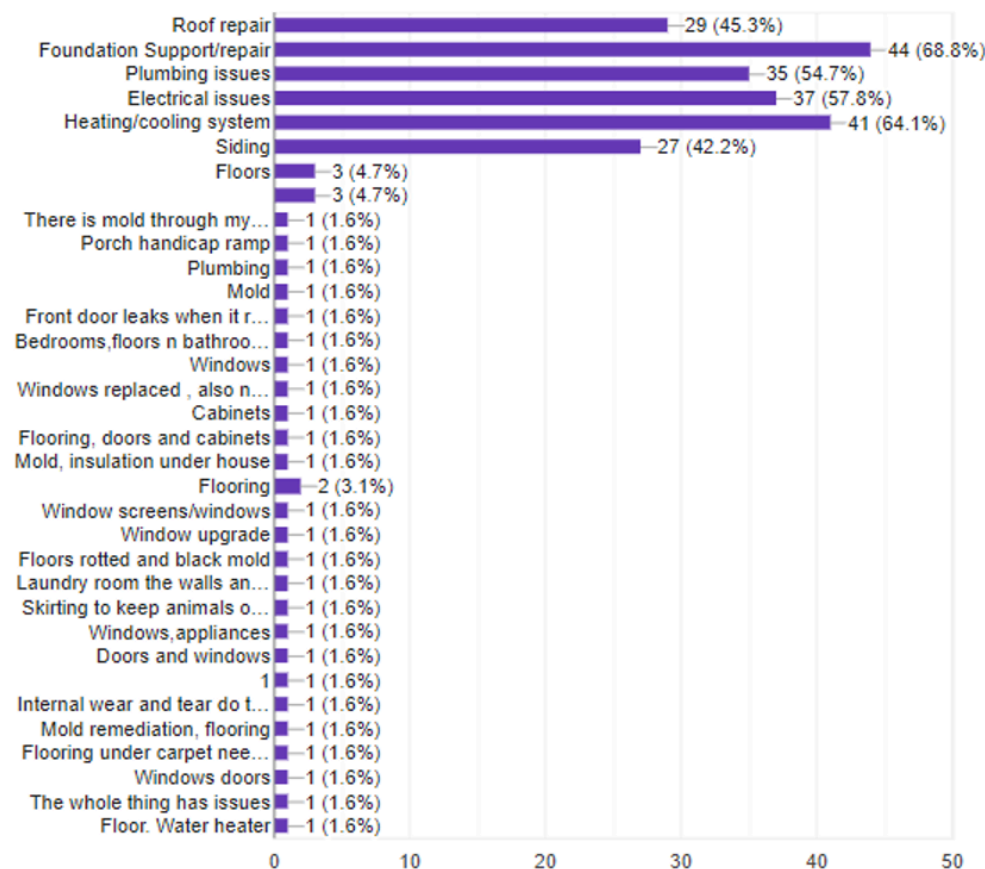
64 responses



3) What are the most urgent repairs or improvements needed in your home? (Select all that apply)



64 responses



TREDC HUD PRICE Competition Grant Community Meeting

Tule River Indian Reservation Gym

July 8, 2024, 6:00 pm

Comments and questions provided from attendees during presentation on the HUD PRICE Competition Grant application

Amanda Sierra, Tule River Tribal Council Member

Question: Is there a length requirement for the home?

Answer: None, just that it needs to be a Manufactured Home and not an RV [Recreational Vehicle].

Vernon Vera, Tule River Tribal Council Member

Question: If the home is pre-1976, what happens to the power and water connections? Is that replaced also?

Answer: If we tear down the house we have to make it fully functional. If we remove hookups (water & electrical) we have to make sure they are all in functioning order.

Amanda Sierra, Tule River Tribal Council Member

Question: Is a travel trailer considered a manufactured home?

Answer: It does not qualify per the grant if it can be pulled behind a truck.

Tule River Community Member not identified by name

Question: For reconstruction, fifth wheels will not qualify under this program?

Answer: No, it will not. It needs to be a manufactured home for this program.

Carly Burrough, Tule River Tribal Member

Question: Is the survey what qualifies us for what we want?

Answer: This survey is still up. We have information in the back so you can click on it and still take the survey. We'll put that information in the application itself. As for qualifications, we talked about that earlier and I can get with you after and show you what those qualifications are.

Carly Burrough, Tule River Tribal Member

Question: Who is going to oversee the grant funding? Will it disqualify the owner from any other program?

Answer: It is administered through TREDC [Tule River Economic Development Corporation] and Pikes Peak Capital. Nothing from this would disqualify you for anything from any other program. Any other program through HUD or HIP that the Tribe is also applying for, this is completely separate. If the Tribe got another grant, then we could reallocate the funds to something else the homeowner needs.

Vernon Vera, Tule River Tribal Council Member

Question: Are we going to cover the workforce development costs?

Answer: We can and should think about workforce development and if there is a budget line item that we can put now that would be ideal. If we cannot come up with a number and a description and it's something we want to do in the future, but don't know what it is going to look like, then we can utilize some of the contingency costs or the built-in indirect costs to cover workforce development expenses

Vernon Vera made an additional comment that the Tule River Tribal Council is interested in workforce development and would be willing to help with in-kind funds for training. .

Vernon Vera, Tule River Tribal Council Member

Question: If a home needs a lot of electrical repairs, can it be replaced with solar? Is that an option?

Answer: Our budget is currently \$3,000 for electrical. To electrify a house with solar is \$30,000. If we were to install solar, this would require us to reallocate funds from other projects to cover the cost. We could do that, but we would want feedback from the community. We are trying to keep our budget on the lower side to stay competitive in this grant process.

Carly Burrough, Tule River Tribal Member

Question: The responses [from the survey] are different than the department's input.

Answer: The answers came solely from the community members. We spoke with the [Tribal] departments on the costs and timing of all the different renovations but the estimated number of people participating was based on the survey responses.

Shelly Gibson, Tule River Tribal Member

Question: Does this include windows and doors/casings because of the settling?

Answer: This does include windows, doors and casings.

Comment: Ms. Gibson thinks we should prioritize using the age of the home.

Kea Ortiz, Tule River Tribal Member

Question: Will this include retrofitting showers and bathrooms for the Elders, handicapped accessible so they will be able to stay in their homes.

Answer: For homes that would be reconstructed we would do it in such a way that is handicapped accessible. We don't have a specific additional line item for handicapped accessible items.

TREDC question to Kea Ortiz: Do you think the need in the community is a large need and is something we should include handicap accessible.

Comment from Kea Ortiz: She feels the percentage of need is 50% of the manufactured homes on the Reservation are in need of handicap accessibility.

Long-term Effect

Our proposal addresses the acute need for affordable housing among low and moderate-income (LMI) households and tribal communities, identified in Factor (a). By providing affordable, secure housing opportunities and promoting economic stability, our programs aim to transform the prospect of homeownership from a distant dream into a tangible reality.

All programs provide sustainable ownership solutions by promoting the dual ownership of land and homes or support the revitalization of existing homes on land provided free of charge to residents on the Tule River Reservation. This approach ensures that we are funding opportunities that feature permanent ownership and give control to homeowners.

To safeguard affordability and prevent displacement of LMI households, our approach includes:

- 15-Year Deed Restrictions: We will implement a 15-year deed restriction on all properties financed under the Down Payment Assistance and Earned Equity programs, ensuring that resale prices are capped and properties remain accessible only to income-qualified buyers. This measure effectively protects the community from speculative pricing and maintains affordability.
- 40-Year Lease Structures with Locked Rental Rate: The Earned Equity Program offers a 40-year renewable lease structure, shielding tenants from market-driven rent increases and facilitating wealth accumulation through eventual homeownership. The agreement begins with a 10-year term followed by three subsequent 10-year extensions at unchanged rates. Additionally, we ensure that no more than 30 percent of EEP renters' gross income is spent on housing costs, consistent with 24 CFR 92.252.
- Homeownership Transition: We facilitate a seamless transition from renting to homeownership for participants in the Earned Equity Program. Residents who start as renters have the opportunity to purchase their homes through an FHA or Section 184 mortgage. Even if they don't execute a formal purchase and sale agreement, payments made during the lease term contribute towards eventual ownership—mimicking a 40-year amortized loan structure where a portion of each payment reduces the principal on the home. After 40 years, the home and land is paid in full and can be deeded over to the buyer.
- Subsidized Homeownership on Tule River Reservation: Finally, homes on the Tule River Reservation are kept permanently affordable as 1) the underlying land is provided to Tribal members free of charge, 2) loans for manufactured homes are provided with a 0% interest rate to residents.

The models outlined in this proposal build long-term wealth for LMI families. Most LMI families need one-time “upfront” financial support to overcome the significant barriers to purchasing their first home. By providing the necessary funds upfront and a pathway for

credit-damaged families to access homeownership, our Down Payment Assistance and Earned Equity programs enable families who might otherwise be perpetual renters to become homeowners and achieve stable long-term housing. Homeownership also allows for the accumulation of wealth that can be passed down to future generations. This is particularly impactful in communities of color, where historical barriers have often limited opportunities for wealth accumulation. Gradual increases in home value can also provide the funds needed for future property purchases. As homeowners improve their properties and engage in their communities, property values can increase area-wide, benefiting the entire community and promoting a cycle of reinvestment and revitalization.

The Down Payment Assistance and Earned Equity Programs are designed to last beyond the initial funding provided by the PRICE grant. Specifically, the down payment assistance program features an interest bearing but concessionary interest rate of [Prime - 3%], which will allow the program to continue beyond the first capital deployment. Some DPA recipients will make payments for 10 years, while others will benefit from a forgivable term after 36 months of on-time payments. For the EEP program, TRED C will initially purchase the home on behalf of the borrower and then collect monthly lease payments, which will cover the cost of the FHA mortgage. Both programs will generate modest revenue which will be reinvested to assist future LMI homeowners during the program term.

Beyond this, the homes on the Tule River Reservation require one-time repairs, such as the installation of electric wiring, awnings to prevent future water intrusion and permanent foundations. These homes will not require repeated interventions for the one-time renovations contemplated. All depreciable revitalization activities (such as roof replacement) feature repairs with a life expectancy of at least 15 years.

Significant investments will be made to enhance the infrastructure and resilience of housing on the Tule River Reservation. These include substantial improvements to weatherization and infrastructure, mitigating future risks from heat, flooding and wildfire. In line with HCDA Section 104(d), we ensure that any demolition activities involved in our projects lead to the 1-for-1 replacement of lower-income dwelling units, maintaining community integrity and preventing the displacement of vulnerable populations.