



## **Attachment H | Summary of Comments Received on Published Application and List of Commenters by Name/Organization**

To ensure wide community engagement, ROC USA provided multiple forums for the public to express their views, concerns, and questions on our application to the U.S. Department of Housing and Urban Development's Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main Program seeking \$75 million in funding.

In accordance with the rules governing the PRICE program, a fifteen (15) day public comment period began Wednesday, June 5, and ended Thursday, June 20. Below are the following activities that happened during the public comment period.

- Notification of the Public Comment Period was delivered to stakeholders on Wednesday, May 21<sup>st</sup>, 15-days prior to the first day of the Public Comment Period. This notification was delivered via e-mail to Board Members that represent the resident-owned communities mentioned in our application, local and state representatives, local newspaper and other media outlets, ROC USA Network (Board Members, ROC Association, CTAPs and ROC USA staff), and other partners and stakeholders.
  - The notification included a summary of the application, time and date of the public hearing, mechanisms to provide feedback and comments, accessibility available for the public hearing, location of the in-person public hearing, and a link to the website for the application and full invitation and agenda for the public hearing.
- Notification of the Public Comment Period was delivered through various ROC USA social media accounts that include Facebook and LinkedIn as well as posted on the ROC USA Website with its own dedicated web address, [rocusa.org/price](http://rocusa.org/price).
- Flyers were delivered to each resident owned community that is represented in the application to post at their community and share with the local surrounding area.
- Notification of Application Availability was delivered on Wednesday, June 6<sup>th</sup> to a broader contact list of ROC leaders across the country plus the stakeholders mentioned above.
- Regular reminders to RSVP for the Public Hearing (hosted on Tuesday, June 11<sup>th</sup>) were posted on social media and delivered through electronic mail.

The Notification of Public Comment Period outlined the different mechanisms to provide questions and comments which included a web survey, electronic and physical mail, in-person, and at the Public Hearing. All materials (including the application) were made available in English and Spanish. For more information, visit [rocusa.org/price](http://rocusa.org/price).



*Public Hearing*

On June 11<sup>th</sup>, 7:00 PM to 8:20 PM ET, ROC USA hosted a live virtual and in-person Public Hearing for our PRICE Application. Seventy-four (74) participants registered, with forty-four (44) participants in attendance virtually for the duration of the Public Hearing. We had made our offices available for persons to attend in-person, accessibly located at 1200 G Street NW, Washington, DC 20005. In addition to the ROC USA staff member leading the Public Hearing, two (2) participants were in-person, one ROC USA staff and one consultant representing CohnReznick, LLP. No one from the public attended the Public Hearing in-person. For the full list of attendees, see the attached sign-in sheet. During the Public Hearing, ROC USA accepted comments, questions, and feedback from the participants. Below you can find a summary of comments, responses and action, if applicable.

<b>Comment, Question, or Feedback</b>	<b>Response from ROC USA</b>	<b>Action</b>
<p>On Page 4, Exhibit B, you state that you will follow certain affordability requirements as set out in the federal rules cited. I'd like to know the basic gist of these rules, and to what extent we may need to add to or amend our current affordability Bylaws.</p>	<p>Currently, we do not anticipate any need to amend the current Bylaws of any ROC as they already meet the federal affordability requirements. ROC USA will use 24 CFR 02.252(a) Rent Limitation as its definition of affordable rents for all housing activities. For both housing and non-housing activities, ROC USA will attach affordability requirements through Land Use Restriction Agreements (LURA) on projects assisted with PRICE funding for a period not less than 30 years. This would mean that “(ii) a rent that does not exceed 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area.”</p>	<p>No action is needed.</p>
<p>There is mention in the application that environmental reviews are necessary. Will the Phase 1 Environmental from when we purchased the park three years</p>	<p>This depends on the project and the status of the project. During the first three months, demonstrated by the tasks and timelines in our application, we will need to further assess the projects and the program</p>	<p>No Action Necessary</p>

<p>ago be acceptable? If not, and there is a cost for this, how will it be paid? Are there other add-on requirements specific to HUD?</p>	<p>requirements that need to be done prior to eligible activities implementation. As part of the project cost projections, environmental review costs were allocated to the overall PRICE budget. Some of the additional requirements that are part of the PRICE program include Davis-Bacon and Build America, Buy America (BABA). For full details, refer to the Notice of Funding for PRICE.</p>	
<p>Fix the use of acronyms like LMI early in the document please.</p>	<p>Thank you for your comment, we will incorporate your feedback.</p>	<p>Modified the acronym “LMI” to include the full text, “low-to-moderate income”.</p>
<p>I’d like the application to emphasize that Animas View MHP Co-Ops infrastructure is shovel ready. I think we are the only ones. How can you elevate our request?</p>	<p>Thank you for the comment and congrats on your project being further along. If you have specific language that you would like to incorporate as part of your project description, please submit it to <a href="mailto:PRICEfunding@rocusa.org">PRICEfunding@rocusa.org</a> or submit it in the survey.</p>	<p>Modified the project description for Animas View MHP Co-Op to include “Infrastructure 50+ years old. Deteriorating water/sewer lines, roads, retaining walls and drainage issues. All designs and building permit approvals expected by 9/1/2024.”</p>
<p>I would like to understand more of the role of CohnReznick. If there is someone at the meeting that help define those services, please.</p>	<p>CohnReznick, a procured vendor, will provide Federal compliance support (ensure costs are allowable, allocable, and reasonable), create templates to demonstrate compliance with Davis Bacon, URA, BABA, and other 2 CFR 200 Uniform Grant Administrative guidance, and reporting of the cross-cutting Federal requirements.</p>	<p>No Action Needed</p>
<p>The Golden Hills line items on Page 9 reflect the wrong amount for lot rent. It also does not mention the need for new water lines along with sanitation. How do we make amendments to the application?</p>	<p>Thank you for the comment. If you have specific language that you would like to incorporate as part of your project description, please submit it to <a href="mailto:PRICEfunding@rocusa.org">PRICEfunding@rocusa.org</a> or submit it in the survey.</p>	<p>Modified language for Golden Hills to include “new water lines”.</p>

<p>Would this grant also assist with the removal of an abandoned home and replacing it with a new unit?</p>	<p>Yes, the PRICE program allows for the removal of an abandoned home and replace with a new unit.</p>	<p>No Action Needed</p>
<p>My understanding was that Environmental Review was needed prior to applying.</p>	<p>HUD has already issued A Finding of No Significant Impact (FONSI) with respect to the NOFO in accordance with HUD regulations at 24 CFR part 50. The FONSI is available for inspection at HUD’s Funding Opportunities web page. An Environmental Review with respect to specific projects will need to be completed prior to any choice-limiting actions regarding any PRICE-related projects and activities but should not be conducted prior to the application.</p>	<p>No Action Needed</p>
<p>It would be advantageous to add items to the list of infrastructure items to be included. The reason for this is if this is a competitive grant and we only receive part of the grant request, other grant/loan requests may only cover replacing water and sewer lines as an example. Can we add to the list for our park?</p>	<p>At the point where we receive notification of any award, ROC USA, in partnership with the ROCs listed in the application, will review the award amount and determine the level of projects that are able to be completed. An assessment of projects will be conducted from months 1 – 3.</p>	<p>No Action Needed</p>
<p>I did send an email so no need to address if I will be getting a response. 1) The date of creation of our ROC (San Souci) is incorrect. 2) I don’t see in the description for Sans Souci what I have been told by the Board was to be included in this Grant, i.e., our much-needed sewer plant, am I misreading the application?</p>	<p>Thank you for your response. We will review the email for any adjustments that you are requesting, if possible.</p>	<p>Modified language for San Souci to include “sewer plant.”</p>
<p>Date of Submission?</p>	<p>ROC USA intends to submit the application on the 2<sup>nd</sup> of July. HUD requires a minimum of three days after the end of the public comment period for prospective applicants to incorporate public</p>	<p>No Action Needed</p>

	comments and feedback into its application, prior to submittal. While HUD encourages early submittal in order to mitigate any administrative or technology issues, applications are due to HUD no later than July 10 <sup>th</sup> , 2024.	
Are there other large or similar organizations like ROC that support ROCs that will be putting in large applications such as this one?	ROC USA is aware of other applications that will mention ROCs or support ROC-related activities that will meet HUD’s national objectives.	No Action Needed

*Electronic Mail*

Comments, questions, and feedback were collected via electronic mail to [PRICEfunding@rocusa.org](mailto:PRICEfunding@rocusa.org). During the public comment period, ROC USA received five (5) emails that were in support of our efforts and outlined the importance of the funding for homeowners in specific communities listed in this application (Animas View Co-Op and The Woods). Attached to this document you will find emails that support our efforts. No comments or feedback that was provided required any necessary action.

*Feedback Survey*

<b>Comment, Question, or Feedback</b>	<b>Response from ROC USA</b>	<b>Action</b>
<p>Acronyms Needing Definitions early in the Document:</p> <ul style="list-style-type: none"> <li>• LMI is not defined until page 21, which then adds LMA and LMH without spelling them out.</li> <li>• TA is only used on page 24 as part of “2) a training and TA plan”.</li> <li>• MSA is first used on page 7.</li> <li>• MHU is first used on page 7.</li> <li>• Page 20 “de minimis”, I am not sure how many people know the term.</li> </ul> <p>Animas View MHP Co-op is mentioned in multiple ways:</p>	<p>Thank you for your comments.</p> <ul style="list-style-type: none"> <li>• LMI – Low- to Moderate-Income</li> <li>• LMA – Low/Mod Area Benefit</li> <li>• LMH – Low/Mod Housing Activities</li> <li>• TA – Technical Assistance</li> <li>• MSA – Metropolitan Statistical Area</li> <li>• MHU – Manufactured Home Unit</li> <li>• <a href="#">Link to "de minimis" explanation</a></li> </ul>	<p>ROC USA will incorporate the edits listed to ensure clarity and consistency in use of terms and acronyms.</p>

<ul style="list-style-type: none"> <li>• Page 9, Animas View</li> <li>• Page 36, Animas View Cooperative</li> <li>• Page 47 is correct</li> <li>• Page 54, Animas View</li> <li>• Page 135 is correct</li> <li>• Page 36, “Comunidad Nuevo Lago MHC in California because a ROC of primarily immigrant Oaxacan” Because should be became.</li> </ul>		
<p>On Exhibit A, page 2, ROC USA’s commitment to preservation and sustainability is providing a breath of life for our community. We want to stay intact and not lose residents faster than we are. The safety of the seniors in our senior community is job number one. We don’t collect survey data on those residents that fall or get hurt and then have to leave in six to twelve months. However, there are reports that provide data showing seniors are more likely to fall and get hurt. I know that many lives will be improved and injuries will be prevented. This application request includes maintenance work. There is benefit in just this alone because awareness of preplanned maintenance is safer to navigate than unplanned emergency repair work for both workers and community members. The risk of seniors falling is a concern for all senior communities. According to Paige Cerulli reporting on the 2022 State of Falls report by SafelyYou for I Advanced Senior Care, it is revealed that one in seven move-outs were related to falls. She also notes that according to the CDC, falls are a leading cause</p>	<p>Thank you for your comments. Safety is an important aspect of the work listed in the application.</p>	<p>No action is needed.</p>

<p>of injury in older adults, and one out of four older adults experiences a fall each year. Residents in our community are being forced more and more to shift to public and private subsidies and handouts. Our entire community is made up of seniors. Seniors have disproportionately been known to suffer at the hands of scammers, hackers and shady workers more than any other group. Please consider this letter as a request for acknowledgement of how critical this funding is. I am in the bottom 20% of the AMI for moderate earners in my community, I hope that you see 100% value in this request by ROC USA for funds from the U.S. Housing and Urban Development (HUD) PRICE Initiative. I am worried that if we don't receive any benefits from this funding, I won't be able to afford my home.</p>		
<p>I would like to make a comment generally supporting ROC USA's effort and say that this is where I want to see my taxes being spent. I am not a ROC resident. I learned about ROC months ago from a news article in my research around shared equity housing. We need more of this kind of work in America. It's the most patriotic work I've seen recently. Thank you for your application and your service. Inspiring, innovative.</p>	<p>Thank you for your comments.</p>	<p>No action needed.</p>
<p>I live in a ROC park in California. I do not think it is appropriate to ask the federal government, therefore, the fellow members of our country, to pay for infrastructure requirements on a private property</p>	<p>Thank you for your comments.</p>	<p>No action needed.</p>

development. Please do NOT use federal dollars to address private property needs.		
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*In-Person*

ROC USA provided the opportunity to submit feedback, comments, and questions in-person at our headquarters (6 Loudon Road, Concord, NH 03301). During the public comment period, no one submitted feedback, comments, or questions in-person.

*Physical Mail*

ROC USA provided the opportunity for the public to submit feedback, comments, and questions through physical mail to our headquarters (6 Loudon Road, Concord, NH 03301). During the public comment period, no one submitted feedback, comments, or questions by physical mail.