

Commenter Organization	Section	Subsection	Comment	Department Response as of 4/19/2023
California Coalition for Rural Housing	200	(a)	Does conversion include the financing of individual lots or shares in a resident owned community? It should and this needs to be clear	Yes, the department may make loans from the fund to benefit individual low-income residents of resident owned communities, to finance any individual interest in the mobilehome park. Eligible applicants would have to meet the requirements of Article IV.
California Coalition for Rural Housing	200	(b)	Says that the only Local Programs is manufactured home rehab or replacement. 201 allowing Administrative Costs is great!	Thank you for your comment.
California Coalition for Rural Housing	202	(a)	Ineligible Costs - Refinancing of existing Loans is an ineligible cost. Refinancing of bridge loans against the Mobilehome Park is needed and was allowed previously. The previous 3-year term limit for bridge loans was too short, perhaps 5 or 6 years is appropriate.	Thank you for the suggestion, further research will be conducted for incorporating changes into future NOFA rounds.
Napa Valley Community Housing	202	(a)	In the case where another HCD loan exists, like a HOME loan, please consider allowing the refinancing of existing State HCD loans be an allowable use of funds. This would allow these older State loans to be updated and project compliance to be simpler when reporting to one regulatory funding source.	Thank you for the suggestion, further research will be conducted for incorporating changes into future NOFA rounds.
RCAC Housing	204	(c)	<p>Add this recommended language : If the Recipient is a Tribal Entity, the following may be apply when the Project is in Indian Country as defined in Appendix A or when the Project uses funding authorized by the Native American Housing Assistance and Self-Determination Act (25 U.S.C. §4111(k):</p> <p>(1) Contracts, subcontracts, grants, or subgrants subject to Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. § 5307(b)) or subject to tribal preference requirements as authorized under 101(k) of the Native American Housing Assistance and Self-Determination Act (25 U.S.C. § 4111(k)) must provide preferences in employment, training, and business opportunities to Indians and Indian organizations, and are therefore not subject to the requirements of Section 3.(2) Title VI of the Civil Rights Act of 1964 may not be applicable. The Indian Civil Rights Act, 25 U.S.C. §§ 1301 et seq., and the Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 et seq., and all implementing regulations, may be applicable(3) Nothing in this Section 205 shall be construed to prohibit a Tribal Entity from giving any and all permissible preference in hiring or other subject areas to Native American individuals in accordance with federal law.</p> <p>(4) Recipient is not subject to those State laws, rules, regulations and guidelines that are civil regulatory, including construction, health and safety, labor, fair employment practices and equal opportunity. Grantee is subject to those tribal and federal laws, rules, regulations and guidelines that regulate construction, health and safety, labor, fair employment practices and equal opportunity as applicable in Indian Country and pursuant to NAHASDA at 25 U.S.C. §§ 4101 et seq.</p>	This has been addressed and can be located in Section 205 of the Final Guidelines.
RCAC Housing	300		Recommend that Resident income be verified at least once prior to distribution of funds. Verification implies some collection of documentation to demonstrate income, whether that be tax returns, pay stubs or bank statements. This will boost transparency and accountability. However, I recommend that at application and at recertification, self-certification may be used to ease administrative burden, especially for households in fixed incomes.	Income verification requirements will be addressed within the Regulatory Agreement.
California Coalition for Rural Housing	300		"This Activity is intended to make improvements to a Mobilehome Park." We beg to differ. The main purpose over the program's 40-year history has been to stabilize the occupancy and cost of living in mobilehome parks. This should be stated here.	The Manufactured Housing Opportunity & Revitalization Program (MORE) offers a variety of eligible Activities that are intended to keep Mobilehome Parks a sustainable source of Affordable housing in California. Each Activity has its own unique requirements including eligible Applicants, eligible uses of funds and Affordability Restrictions. In section 300 our intent is to highlight that these Activities are intended for Mobilehome Parks and not Individuals.

RCAC Housing	300.1	(b)	(1) To ensure compliance, the Recipient shall complete income verification and certification of Residents prior to distribution of funds and recertify Resident's income annually. (2) Recipients may use a self-certification method to complete income recertifications.	Income verification requirements will be addressed within the Regulatory Agreement.
RCAC Housing	300.1	(c)	(c) Make repairs to individual Mobilehomes. Funding for repairs to an individual Mobilehome to remedy Mobilehome Parks Act violations cited against the Mobilehome Park may be requested as part of an application under, 301 of these guidelines. Funding to directly assist individual Residents with repairs or upgrades to their Mobilehomes may be requested under § 400 of these guidelines.	Thank you for your suggestion.
RCAC Housing	300.1	(a)	(a) Upon Acquisition (for existing Residents)- all Low-Income Residents must be provided lease or rental terms that are Affordable, as defined in Appendix A, however, this amount is not required to be less than lease or rental terms in effect immediately prior to acquisition. (b) Upon move-in (for new Residents), all Low-Income Residents must be provided lease or rental terms that are Affordable, as defined in Appendix A, to a Low or Lower-Income Resident, as defined in Appendix A.	Income verification requirements will be addressed within the Regulatory Agreement.
RCAC Housing	300.1	(b)	(c) To ensure compliant lease or rental terms, the Recipient shall do the following: (1) Prior to distribution of Program funding, the Recipient shall do income verification of all existing Residents; (3) Annual income recertification is to be performed to ensure current resident qualifies for the program. Recipients may use a self-certification method to complete income recertifications. If the Recipient is unable to perform, a subcontractor may be used to perform this function.	Income verification requirements will be addressed within the Regulatory Agreement.
RCAC Housing	300.1	(c)	(d) The Mobilehome Park shall keep the same number of Low-Income Spaces throughout the Affordability Period as were in place at the time of application. For the purposes of this paragraph, a space counts as a Low-Income Space as long as the Resident of that space was verified as a Low-Income Resident at the time of application or at the time of move-in, whichever is later; the Recipient is required to recertify Resident income annually.	Income verification requirements will be addressed within the Regulatory Agreement.
California Coalition for Rural Housing	300.1	(b)	States "Recipients may use a self-certification method to complete income certifications".	Income verification requirements will be addressed within the Regulatory Agreement.
California Coalition for Rural Housing	300.1	(b)	Refers to "income verification" of all existing Residents prior to receiving program funds and for new residents and annual "self-certification". We propose the income verification mean that documentation of some sort is collected to verify income, and that it be done at park acquisition, prior to release of MORE funds, or at time of assistance for homeowners. We propose self-certification be allowed at Application by the Recipient, and for annual recertifications. We support that the Guidelines say self-certification "may" be allowed, so that the Recipient may also require income verifications for accountability.	Income verification requirements will be addressed within the Regulatory Agreement.
Napa Valley Community Housing	300.2		Please consider adding a priority funding category for preservation and rehabilitation of State regulated 100% low-income affordable housing. This could apply specifically to mobile home parks owned and operated by local nonprofit affordable housing organizations that have existing HCD affordable housing covenants. This could also prioritize mobile home parks with existing regulations for tenant incomes at 60% AMI and below for new residents.	Thank you for the suggestion. We encourage these organizations to meet with program staff to discuss their specific projects. A meeting can be scheduled by contacting MORE@hcd.ca.gov.
RCAC Housing	300.3	(d)	(4) Applicants may subcontract with an Administrative Subcontractor or one or more consultants to meet the requirements of this section for organizational stability and experience.	Please refer to the Administrative Subcontractor definition in (Appendix A).
RCAC Housing	300.3	(d)	(6) All Applicants eligible under this section may partner with a Local Public Entity or nonprofit organization that has successfully administrated an affordable housing program within the last year to meet the experience requirements.	Section 300.3 (d)(1)-(5) in the Final Guidelines addresses requirements for demonstrating organizational stability and capacity and have been updated to reflect different applicants.
California Coalition for Rural Housing	300.3		Eligible Applicants. Depending on how eligibility is evaluated, resident organizations may never have "sufficient organizational stability and capacity" to be eligible for MORE funding. This would be directly in conflict with the purpose for which the program was created. In particular, no resident organization that wishes to buy its own park has ever developed a similar project as required by 300.3(d)(1). Experience owning and managing a manufactured housing community (300.3(d)(3)) is another requirement that is impossible for a resident organizations to satisfy. Only a handful of nonprofits actually have this experience.	Section 300.3. Eligible Applicants has been updated to clarify organizational stability and capacity requirements.

California Coalition for Rural Housing	300.3	(d)	<p>(4) states "applicants may subcontract with an Administrative Subcontractor to meet the requirements of this section for organizational stability and experience." The program could better serve multiple ownership types if it included multiple subcontractors or a Development/Management Team. For example, ROC USA and CCD have a contractual relationship and work together to meet the stabilization and capacity requirements, complementing each other's work. To broaden the eligibility for all capable applicants, we recommend the following changes to sections 300.3(d) and its subsections.</p> <ul style="list-style-type: none"> <li>• The term Applicants should generally be replaced with something like Applicants or their Development Team</li> <li>• 300.3(d)(2) should say applicants must have staff, consultants and/or advisors.</li> <li>• Development Team should be defined in Appendix A to include, but not be limited to consultants, advisors, attorneys, technical assistance providers, property managers, etc.</li> <li>• Allow for partnership requirements to be met by reserving board seats in a resident-owned community for a Local Public Entity or nonprofit organization that has successfully administrated an affordable housing program within the last year.</li> </ul> <p>Sections 300.6, 301.4 and 302.4 have Loan Terms, but Section 400.4 has Loan and Grant Terms. Sections 300.6, 301.4 and 302.4 should be modified to allow grants rather than just forgivable loans.</p>	Section 300.3 (d)(1)-(5) in the Final Guidelines addresses requirements for demonstrating organizational stability and capacity. Documents may be required to evidence stability and capacity and those will be outlined in the application.
Napa Valley Community Housing	300.3	(d)	Please consider specifying that eligible similar project experience within the last five years includes any government funded 100% affordable housing development even if not redevelopment of a mobile home park.	Similar experience may be substituted by an affordable housing project as long as relevancy to the proposed project can be justified.
Western Center on Law & Poverty	300.3	(d)	As a re-brand of the underutilized Mobilehome Park Rehabilitation and Resident Ownership Program (MPRRP) the experience eligibility criteria for MORE should be more closely aligned with the purpose of the rebrand. As drafted a Resident Organization may meet the experience requirements if they "partner with a Local Public Entity or nonprofit organization that has successfully administrated an affordable housing program." The language used seems to create a barrier for Resident Organizations, such that a nonprofit partner must specifically have experience running an affordable housing program. While the goal of MORE is to set up long-term affordability for mobile home parks, and such experience is preferred, we would recommend language that is more inclusive of the nonprofit organizations currently assisting low-income mobile home park residents form resident owned communities. We recommend that Section 300.3(d)(5) be amended to: (5) Resident Organizations using Program funds to convert the Mobilehome Park from private ownership may partner with a Local Public Entity or nonprofit organization that has successfully administrated an affordable housing program within the last year and/or has successfully assisted any Resident Organization in the financing, purchase and administration of a resident owned mobilehome park within the last year to meet the experience requirements.	Thank you for your suggestion. This change will be reflected in the Final Guidelines.
RCAC Housing	300.4	(j)	(j) Cost to remove an abandoned Mobilehome or a Mobilehome that has been replaced from the Park.	Section 300.4 Eligible Costs (l) would apply to costs associated with replacing individual mobilehomes. Costs to replace Individual mobilehomes would be applicable under Section 301.
RCAC Housing	300.4		In Section 300.4, it is unclear whether funding for the cost of an Individual Interest in the mobilehome park is allowed. The definition of Costs in Appendix A includes individual interests, but the capitalized term Costs does not appear in the guidelines. Therefore financing for Individual Interests ought to be added here in §300.4 and in §302.2. Or if HCD wants Individual Interests only in a Local Program, then it belongs in §400.	The department may make loans from the fund to benefit individual low-income residents of resident owned communities, to finance any individual interest in the mobilehome park. Eligible applicants would have to meet the requirements of Article IV.
RCAC Housing	300.7	(a)	The Department determines that the Loan will have a substantial benefit to Low-Income Residents and that the Recipient agrees to maintain Rents at levels Affordable to Low-Income Residents pursuant to §300.10 of these guidelines.	Thank you for your comment. This has been updated.

California Coalition for Rural Housing	300.7		Activity Specific Requirements lists the requirements for nonprofit housing and public entity applicants as applying for resident organizations as well. See HSC 50784.5(a). These should not apply for resident purchases. For resident organizations, Section 300.7 should only list "...at least two-thirds of the households residing in the mobilehome park support the plans for acquisition and conversion of the park (HSC 50786(e)(1)." 300.7(a)(2)(b) might apply to resident organizations. Existing residents whose income drops should be able to qualify as low income and be eligible for rent reduction/rental assistance. 300.10(c) and 302.7 seem to preclude this.	Section 300.7(a)(2)(b) does apply to resident organizations. Resident Support is required and is identified in the application. Section 300.10 has been updated in the final guidelines and identifies the Affordability Restrictions.
California Coalition for Rural Housing	301	(b)	"May subcontract with an Administrative Subcontractor." This needs to be broader to include consultants, management companies and other professionals. Emphasis on multiple.	Please refer to the Administrative Subcontractor definition in (Appendix A).
California Coalition for Rural Housing	301	(c)	States "Private Mobilehome Park Owners and Resident Organizations may partner with a Local Public Entity or a nonprofit organization that has successfully administrated an affordable housing program within the last year to meet the experience requirements." All applicants should be able to contract with consultants, management companies and other program administrators that have experience with manufactured housing communities. 1-year experience with "an affordable housing program" is not necessarily relevant.	Thank you for your comment. This has been updated.
RCAC Housing	301.1	(d)	(3) The Mobilehome Park Owner own the Mobilehome Park for which funding is being applied, and no other Mobilehome Parks.	A Private Park Owner applying for funding can only own one Mobilehome Park. If, six months following the issuance of the first notice of funding availability, 55 percent or more of funds remain uncommitted, the department may revise eligibility requirements by increasing the number of mobilehome parks a private park owner may own to no more than three.
RCAC Housing	301.1	(b)	(f) Applicants who do not satisfy the requirement of §301.1(e)(1) may subcontract with an Administrative Subcontractor or one or more consultants who satisfies the requirements of §301.1(e)(1).	Please refer to the Administrative Subcontractor definition in (Appendix A).
RCAC Housing	301.1	(c)	(e) All Applicants eligible under this section may partner with a Local Public Entity or a nonprofit organization that has successfully administrated an affordable housing program within the last year to meet the experience requirements.	This will be addressed in Section 300.3 Eligible Applicants in the Final Guidelines.
California Coalition for Rural Housing	301.1		The numbering in 301.1 is unclear, jumping from subsection (e) to (c). The second (b) should be (f) and the second (c) should be (g).	Thank you for your comment, this has been updated.
RCAC Housing	301.2	(a)	(a) Eligible costs may include: (5) The Department may approve or disapprove the above costs in (1) –(4) in its sole and absolute discretion.	Thank you for your comment, this has been updated.
RCAC Housing	302.1		For disaster response should be edited to include a Private Mobilehome Park Owner as an Eligible Applicant. Criteria for these Private owners should include criteria similar to §301.1 (d)(1) through §301.1 (d)(3), but without §301.1 (d)(3)(A). Most of the mobilehome parks destroyed in recent disasters were privately owned, and if a good operator wants to rebuild, they should be eligible. Similar to the comment about §300.3 above, §302.1 should allow one or more consultants to meet the requirements for stability and experience.	We encourage Private Park Owners impacted by Natural Disasters to apply under Section 301. Program staff will meet with all interested potential applicants, to ensure applications are submitted under the activity which best matches the proposed project.
California Coalition for Rural Housing	302.1		This is counterproductive to the new MORE Legislation, which allows funds to go to "for Profit" MHC owners as long as they agree to keep Parks affordable. As we learned from the Camp Fire, the majority of for-profit parks in Butte County were affordable and privately owned. Most of which were mom & pop operations without sufficient liquidity to rebuild after the fire. There were no funding sources to assist in preserving this category of MHCs.	We encourage Private Park Owners impacted by Natural Disasters to apply under Section 301. Program staff will meet with all interested potential applicants, to ensure applications are submitted under the activity which best matches the proposed project.
California Coalition for Rural Housing	302.1	(d)	(1) There are only a handful of nonprofits that meet these criteria and very few if any "public entities". Therefore, making this an unusable category of funding to assist in redeveloping MHCs, if we are only talking about MHC development experience.	Similar experience may be substituted by an affordable housing project as long as relevancy to the proposed project can be justified.
California Coalition for Rural Housing	302.4	(c)	In the case of disaster recovery, the need for "forgivable loans" will be in the majority of cases, if affordability is the ultimate goal.	Section 302.4 Loan Terms states that Loans may be awarded as a Forgivable Loan to the Recipient.

California Coalition for Rural Housing	302.5	(b)	(1) The acceptable "manners" of providing written notice to former residents should be clarified or a plan provided for approval by HCD, keeping in mind the difficulties of locating survivors after a disaster, especially after several months or a couple of years have passed, as is the case for the slow rebuild of MHCs in many disaster-stricken communities. (b) (2) As long as this doesn't impede reconstruction beginning. (c) This term "to the extent possible" should be defined, so applicants know any limits not to exceed. (d) Could this reflect a sliding scale tied to the amount of MORE Funding used in the project, i.e. the percentage of the total cost of redevelopment?	We will clarify requirements during the application process. This is an over the counter application and program staff are committed to work with applicants throughout the application process.
RCAC Housing	302.7	(c)	Section §302.7 calls for re-verification (implying documentation) annually and then says selfcertify annually. It should be recertify.	Updates have been made to Section 302.7 in the Final Guidelines. Income verification will be further detailed within the regulatory agreement.
RCAC Housing	302.7	(d)	Proposes caps on rent increases linked to CPI or a flat 5%. Why not utilize the increase in AMI as used in other affordable housing programs?	The intent behind allowing increases in rents is to allow the park owners sufficient funding to continue covering the costs of maintaining the park; those costs are more closely linked to CPI than to AMI. In addition, AMI has historically increased due to increases in income for the highest-income tiers, not due to increases in income for low-income households, so it is not a good measure of whether the low-income resident can afford a rent increase of that amount. Most affordable housing programs based rent increases on AMI because their rents are set based on AMI tiers; MORE Act rents are not set that way (as per statute). Finally, most local mobile home rent control policies use a combination of CPI or flat 5% for annual rent increases.
RCAC Housing	302.7	(e)	Calls for returning Residents to get the lesser of their prior rent or an Affordable Housing Cost. Lowering rents below what they were previously may mean a park is not financially sustainable. I suggest the Affordable Housing Costs have a floor of what it was at the time of the disaster.	The Final Guidelines will reflect significant updates to Section 302.7 .
RCAC Housing	302.7	(f)	I agree with the approaches in §302.7(f), and recommend adding this approach to all sections with a condition that existing residents can continue paying what they were previously, even if not affordable. The demonstration of financial hardship can be made at application, or again in any year after lease-up.	Refer to Section 302.7 (4) in the final guidelines for updates related to Rent increases.
California Coalition for Rural Housing	302.7	(b)	(1) Need to define what forms of "income verification" are acceptable.	Income verification requirements will be addressed within the Regulatory Agreement.
RCAC Housing	303		Section 303 does not seem have the right citation for a Right of First Offer. Please check.	Awards made pursuant to Article III of these guidelines are subject to HSC Section 50784.6(a)(2). Should the Recipient intend to sell the Mobilehome Park during the Affordability Period, Recipient shall provide a Right of First Offer in compliance with this section, which shall remain open for a period of no less than sixty (60) calendar days.
RCAC Housing	400		Should reference either the Local Program, or Recipient for the approved service location. Referencing the Program makes it seem that MORE has an approved service location, and it does not.	Program funds awarded pursuant to Section 400 shall be used for the Rehabilitation or Replacement of individual Mobilehomes. Program funds may be used to assist individual Mobilehomes located in a variety of locations within the approved service location of the Local Program.
California Coalition for Rural Housing	400		MORE mobilehome rehab and replacement "funds may be used to assist individual Mobilehomes located in a variety of locations within the approved service location of the Program." The statutes do not place any geographic or other limitations on the use of these funds. In the past they were limited to communities owned by residents, nonprofits or local governments. We recommend a high priority to rehabbing mobilehomes located in communities owned by residents, nonprofits or local governments be expressed in the NOFA.	Thank you for your suggestion. The NOFA will highlight all funding Targets, Geographic Distribution of Funds and Funding Priorities.

Western Center on Law & Poverty	400		The Draft Guidelines allow for direct grants to mobile home residents administered by three eligible applicants: a resident organization, qualified nonprofit housing sponsor, or a local public entity. Since Residents cannot directly apply for MORE funds, it is imperative that there is some prioritization for certain communities including Tribal entities, farmworker communities and rural areas where there is a large concentration of mobile home parks that comprise a large majority of the available affordable housing stock in a geographic region. These communities typically have more barriers in accessing resources because of their remote locations, language barriers, limited local infrastructure, and limited nonprofit housing support services.	Thank you for your suggestion. The NOFA will highlight all funding Targets, Geographic Distribution of Funds and Funding Priorities.
RCAC Housing	400.1		Says that any funding needed for a mobilehome with a health and safety violation must fit in §301, and that is inaccurate.	Section 400.1 Eligible Applicants indicates that Private Mobilehome Park owners are not eligible to apply for funding for this Activity type. If funding is needed to repair or replace an individual Mobilehome in a Mobilehome Park to remedy a Health and Safety violation, they are eligible to apply pursuant to Section 301.
California Coalition for Rural Housing	400.1		States that “If funding is needed to repair or replace an individual Mobilehome in a Mobilehome Park to remedy a Health and Safety violation, (Private Mobilehome Park Owners) are eligible to apply pursuant to §301 of these guidelines.” The statutes do not appear to give this authority to Private Mobilehome Park Owners. An eligible applicant would need to apply for §400 funds to remedy Health and Safety violations on individual mobilehomes. In addition, HCD has authority to contract with others to operate a program to rehab/replace individual homes under HSC 50784(c). However, loans under this section are limited to homeowners who earn less than 60% of AMI. We prefer that this HSC section not be used.	Private Park Owners are not eligible to apply under Section 400. If a Private Park owner wants to apply for funds to repair or replace an individual Mobilehome in a Mobilehome Park to remedy a Health and Safety violation, they would be eligible to apply pursuant to Section 301.
California Coalition for Rural Housing	400.2	(a)	(1) limits repairs to correcting “Health and Safety concerns.” The Appendix A definition of Health and Safety Code is limited to HSC §18200-§18700. The definition should be broadened, and this section should also allow for a broader range of repairs and improvements. For example, room additions should be allowed to remedy overcrowding.	Section 400.2 (d) could be used since in most cases the costs needed for repairs may be more than the costs to replace the Mobilehome.
California Coalition for Rural Housing	400.2	(a)	Does not specify relocation costs as an eligible cost of repairing a home. The reference to CCR, Title 25, §8020 for relocation costs in 400.2(b)(4), 400.2(c)(4) and 400.2(d)(7) is incorrect. Instead, should refer to the section that applies temporary displacement due to housing rehabilitation.	California Code of Regulations Title 25, §8020 (4) addresses assistance and payment consistent with the requirements of the Relocation Act.
California Coalition for Rural Housing	400.4		Loan and Grant Terms. Guidelines need to specify when grants can be made. A grant term of 3 years is too short if the cost is significant. Perhaps “up to 30 years” would be appropriate?	The NOFA will clarify requirements under Program Requirements for Activities Specific to Individual Mobilehomes.
Western Center on Law & Poverty	600		This Article alludes to recipient’s reporting obligations in Section 600 and Section 601. Given our experience with HCD funding administered by local public entities and similarly situated third parties, we recommend that the Department impose monthly, or at the minimum quarterly, financial reporting requirements for Grant Administration rather than “at least annually” as currently stated in Section 601(a)(1). Financial reports should include grant disbursements, obligated funds, and progress reports on spend down activities. Consistent with the monitoring requirements in in Section 601(b), recipients should submit to the Department as part of any monthly or quarterly financial reports a summary of local program performance including data on grantee demographics, and number of applications approved or denied.	Thank you for your suggestion. The Regulatory Agreement will outline reporting requirements.
RCAC Housing	Appendix	Forgiveable Loan	Forgiveable loans ought to have an option to forgive over time and not all at once when the term has ended. For a for-profit entity allowed to apply in §301, loan forgiveness will likely be 7 considered income by the IRS. It will be better to forgive portions of the loan over several years to avoid a big tax bill on what is “phantom” income not actually received.	Thank you for your comment. Affordability Restrictions are connected to loan forgiveness terms. We will conduct further research and see if the ability to forgive over time is an option in future rounds.

RCAC Housing	Appendix	Housing Cost	Maintenance and repairs should be removed as part of Housing Costs which is capped at 30% of income where feasible. The cost of mowing a lawn on the lot or fixing a sink in the mobilehome should not result in lowering the rent that may be paid. And the monthly space cost in a cooperative is often not called rent, but rather assessment, carrying charge or other as added in the proposed (g). (g) Assessment, carrying charges or Homeowner Association fees charged by the cooperative if the Unit is situated in a cooperative	Thank you for the suggestion, further research will be conducted for incorporating changes into future NOFA rounds.
RCAC Housing	Appendix	Local Project	Local Programs is defined in Appendix A, but it is not clear which section counts as a Local Program. Is it §400? If so, that section needs to include financing Individual Interests.	Yes, Section 400 includes Requirements for Activities Specific to Individual Residents, which includes financing individual interests.
RCAC Housing	Appendix	Mobilehome Park Owner	The definition of Mobilehome Park Owner should allow for several individuals, such as husband and wife or 3 unrelated individuals to own the park. This is common among privately owned parks and Polanco parks.	The final guidelines will reflect a new definition for Private Mobilehome Park Owner which will address your comment.
California Coalition for Rural Housing	Appendix A		Financing individual interests is discussed throughout Appendix A but it's not addressed in the guidelines – may belong in Eligible Uses within each section (ex. 300.2, 302.2, 400.2). Financing condo lots and co-op shares seems to be a Conversion cost but isn't listed there. It also seems to be in Article IV as an activity "specific to individual Residents," but isn't addressed there.	Yes, the department may make loans from the fund to benefit individual low-income residents of resident owned communities, to finance any individual interest in the mobilehome park. Eligible applicants would have to meet the requirements of Article IV.
California Coalition for Rural Housing	Appendix A		Annual Income definition should reference state codes rather than federal codes. In addition, the MORE statutes specifically prohibit imputing income from assets (See HSC 50781(g)).	Income verification requirements will be addressed within the Regulatory Agreement.
California Coalition for Rural Housing	Appendix A	Costs	Includes "increasing space capacity." This is great and should be repeated elsewhere.	Increasing space capacity is an eligible cost but is not a priority for funding. For that reason it is not highlighted anywhere else.
California Coalition for Rural Housing	Appendix A	Forgivable Loan	Should allow forgiveness either at end of the loan term or partially during the term.	"Forgivable Loan" means a loan from the Department to a Recipient that once the term of the Loan has ended and all terms of the Loan have been met, the obligation to repay the principal and interest is forgiven and there is no further obligation for repayment of the Loan.
California Coalition for Rural Housing	Appendix A	Health and Safety Code	Definition needs to be broader.	The definition references HSC Section 18200 - Section 18700, which provides more information.
California Coalition for Rural Housing	Appendix A	Housing Cost	Needs to include HOA dues, assessment and carrying charges for ROC.	The definition references California Code of Regulations, Title 25 Section 6920 which can provide a full list of costs. HOA dues are listed.
California Coalition for Rural Housing	Appendix A	Individual Interest	Paragraph (c) should read "Membership in a nonprofit corporation that owns, or operates, or owns and operates, the Mobilehome Park." Resident organizations may be structured as either a public or mutual benefit corporation.	Individual Interest is not a defined term.
California Coalition for Rural Housing	Appendix A	Local Jurisdiction	Should correct "agent" to "agency."	Thank you for your suggestion. Changes have not been made at this time.
California Coalition for Rural Housing	Appendix A	Local Project	definition paragraph (c) should read "Acquisition, construction, reconstruction or rehabilitation of a Mobilehome Park as a response to a Natural Disaster..."	This has been updated in the Final Guidelines.
California Coalition for Rural Housing	Appendix A	Local Public Entity	Should also specify Community Development Commissions (HSC 34100).	Thank you for your suggestion. Changes have not been made at this time.
California Coalition for Rural Housing	Appendix A	Low or Lower-Income Resident	Definition should refer to HSC 50079.5 rather than repeat or paraphrase that code section.	Thank you for your suggestion. Changes have not been made at this time.
California Coalition for Rural Housing	Appendix A	Low-Income Spaces	Definition should allow spaces to be moved.	The definition does not state that spaces cannot be moved.
California Coalition for Rural Housing	Appendix A	Rehabilitation	Definition does not allow the replacement of personal property. The replacement of major appliances should be allowed (stove, fridge, washer, dryer). For a manufactured home that is not real property, stairs, decks, awnings, sheds, cabana, etc. are personal property and should also be allowed.	Rehabilitation does not include replacement of personal property.
California Coalition for Rural Housing	Appendix A	Rents	Definition should include carrying charges in a ROC.	Thank you for your suggestion. Changes have not been made at this time.
California Coalition for Rural Housing	Appendix A	Resident	Paragraph (c) should read "occupy or intend to occupy."	Thank you for your suggestion. Changes have not been made at this time.
RCAC Housing	Appendix B		I believe it is unlikely that the BIA will consent to the Applicant executing any documents, as that is not BIA's role. I suggest striking that phrase.	Appendix B has completely been removed from the Final Guidelines.

Alimur Mobile Home Park			<p>Santa Cruz County had this a forgivable loan for Mobile Home a few years ago, but it was hard to gain information from the County. I would rather see Interest Rates lowered on Mobile Home Loans in general – along with Revitalization;</p> <p>For Example: I originally was quoted at a 6% interest rate, but with the buy-in certificate the Underwriter raised it to 7.1% for 22 years (At the time interest rates for a residential home was at 2%). Before the FEDS started to raise the interest rates: I looked into a refinancing, and I was quoted at 4.99% (I think I saved ~\$600 a month), but again the Underwriter denied my refi – because of the Buy-In Certificate. I did look local too, but they could only lowered it from 7.1% to 6%, which was a savings of only a few dollars a month – which did not cover the transaction fees of \$6000. Please insist that a Mobile Home Loan interest rate aligns the same as with a Residential Home mortgage interest rate, and have mobile homes more affordable – especially for senior citizens like me. This lower interest rate would also help with our mobile home coach improvements &amp; space improvements – since more money would be available from the lower interest rate (especially for those that pay more than 70% of their Income on Rent).</p>	Thank you for your comment. The Department does not have jurisdiction over interest rates on Mobilehome purchases.
Old Mill Mobile Home Park Residents Association			<p>Given that our park owner has not proved willing to help us and is ineligible for MORE funding, how we as a residents association could benefit from MORE to improve health and safety in our park, especially around flood abatement and recovery. If this is not allowed under the current draft guidelines, I would like to request that some provision for this be included in final guidelines.</p>	Please reach out to MORE@hcd.ca.gov and request a meeting with Program staff.
County of Santa Clara			<p>The addition of rehabilitation or replacement of individual resident’s mobilehomes is a great addition to the program, thank you!</p>	Thank you for your feedback.
County of Santa Clara			<p>It looks like recreational vehicles are not included in the definition of mobilehomes. Would it be possible to include RVs within the rehab/replacement category for individual coach owners? In our local community we have a significant number of extremely low income households with RVs that are in need of replacement. We do have a need to replace mobilehomes which are older than 1976, but expanding the category to include forgivable loans to replace dilapidated RVs would greatly increase the useability of the program for our community.</p>	Thank you for your comment. Currently Recreational Vehicles are not included in MORE. We encourage you to reach out to MORE@hcd.ca.gov to discuss alternative options.
Western Center on Law & Poverty	601		<p>The Draft Guidelines lack any guidance for recipients under Section 601 regarding application procedures for the mobile home resident grant program. The Draft Guidelines lack minimal guidance on how recipients are to implement a grant program, other than a reference to a Standard Agreement with the Department that shall contain “the Recipient’s responsibilities for administering the Local Program or operating the Project funded by the Department” in Section 600(a)(6). At minimum, once drafted the Department should publish a copy of the Standard Agreement(s) in an Appendix to the Draft Guidelines or other type of publicly accessible document for each type of eligible Activity.</p>	The intent behind this is to allow flexibility. So that recipients can design a plan that best works for them, and not require a one size fits all solution in this case. Program staff can provide further assistance or provide samples if requested.