

FUTURE PROGRAM

(Finding US Tomorrow's Universal Residential Experience)

Mid-Ohio Regional Planning Commission

Application to

U.S. Department of Housing and Urban Development

Community Planning and Development

Pathways to Removing Obstacles to Housing (PRO Housing)

FR-6700-N-98

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Exhibit A. Executive Summary

The Mid-Ohio Regional Planning Commission (MORPC) projects Central Ohio to have as many as 3.15 million residents by 2050, a 30% increase from the current population of 2.42 million. The demand for more homes of all types and prices is also growing, with the greatest impact to lower- and moderate-income households. Yet for over ten years, Central Ohio has not built enough new homes to keep up with the demand.

As the regional council for Central Ohio, MORPC convenes and collaborates with local governments, partners, and stakeholders on key issues facing our region. Perhaps no issue is more front-of-mind for Central Ohio decision-makers than housing. In 2020, MORPC and its partners produced a Regional Housing Strategy for Central Ohio. The Regional Housing Strategy (RHS) sets forth a bold vision: a future where growth and post-pandemic recovery help realize *more* equity among Central Ohioans, not less. We believe housing – where it's built or maintained, who it's for, and how it's priced – can be a platform to achieve this vision.

Although Central Ohio has made progress on the recommended actions of the RHS, a shortage of housing at all prices, particularly for lower- and moderate-income households, has increased in the years since the RHS was produced. Adding urgency to the challenge is Central Ohio's continued robust growth and recent major economic development investments, anticipated to generate thousands of construction-related and permanent jobs.

With funding from the HUD PRO Housing grant, MORPC proposes to directly address core housing issues and barriers identified within the RHS with a comprehensive vision to maintain existing affordable housing and expand affordable housing options. Focused on the priority geography of Franklin County, the proposed tasks will be led by MORPC in regional coordination with Central Ohio local governments and RHS and LinkUS partners. Through this collaboration they will prioritize neighborhoods along LinkUS corridors, which are at risk of continued loss of affordable housing options due to persistent development pressures.

Key project tasks outlined within this proposal include:

1. Update the RHS analyses and convert them into tools for local governments.
Communicate findings with outreach.
2. Innovative housing design pilot
3. Produce standardized zoning code language and green tape development review process.
Support implementation in Franklin County communities with technical assistance.
4. Preserve naturally occurring affordable housing with expanded home repair and weatherization services

Exhibit B. Threshold Requirements

1. Resolution of Civil Rights Matters

The Mid-Ohio Regional Planning Commission (MORPC) does not have any outstanding civil rights matters.

2. Timely Submission of Application

MORPC grants that this application has been submitted prior to the posted deadline.

3. Eligible Applicant

MORPC grants that it is a Metropolitan Planning Organization (MPO) and therefore an eligible applicant in accordance with Section III.A of the Notice of Funding Opportunity.

4. Number of Applications

MORPC grants that this application represents the sole application submitted by MORPC in response to this Notice of Funding Opportunity.

Exhibit C. Need

Central Ohio is at a critical inflection point. The past decade has been one of historic growth for the region, and that growth is expected to continue for the foreseeable future – with the Mid-Ohio Regional Planning Commission (MORPC) projecting Central Ohio to have as many as 3.15 million residents by 2050, a 30% increase from the current population of 2.42 million.

Not only is the region growing; it is changing. Households are becoming more diverse in terms of age, race/ethnicity, ability, and household size. The demand for more homes of all types and prices, particularly homes priced for lower-income households, is also growing. Yet for over ten years, Central Ohio has not built enough new homes to keep up with the demand driven by its population growth. Recent studies by the Building Industry Association of Central Ohio show a need for at least 14,000 additional residential building permits per year through 2050 to keep up with current growth projections – an approximately two-fold increase from recent permitting trends.¹

In 2020, in response to these worrying trends, MORPC produced a Regional Housing Strategy for Central Ohio.² The Regional Housing Strategy (RHS) sets forth a bold vision: a future where growth and post-pandemic recovery help realize *more* equity among Central Ohioans, not less. We believe housing – where it's built or maintained, who it's for, and how it's priced – can be a platform to achieve this vision.

As the regional council for the Central Ohio Region, MORPC's core responsibility is to facilitate the region's transportation planning process. As such, we are experts in research and forecasting, public policy, facilitating funding and financing, and acting as a bridge to convene and connect local governments and encourage collaboration, driving the holistic regional value.

But the role we embody in the region is much broader, focused on ensuring the region has a prosperous and sustainable future and provides a robust quality of life. MORPC is the trusted voice and advisor in guiding and facilitating investments in transportation and infrastructure. We are a capacity builder, driving synergy and creating greater value for the entire region. We inform policy choices and provide community resources that impact mobility, land-use, environmental sustainability, and housing stability. While our work directly serves local governments and community leadership, the ultimate beneficiaries of our efforts are all residents in the region. We are driven to ensure access to what matters most — jobs, healthcare, food, education, and leisure activities.

MORPC values diversity of culture and thought as tenets of a sustainable regional ecosystem. We are committed to values that embrace all populations of the region and work to ensure our prosperity agenda gets implemented in a fair and equitable way.

¹ Building Industry Association of Central Ohio Housing Need Assessment (2017, 2022) <https://www.biahomebuilders.com/housing-study/>

² MORPC Regional Housing Strategy for Central Ohio (2020) <https://www.morpc.org/programs-services/regional-housing-strategy/>

MORPC is a reliable and trusted partner in elevating a collaborative atmosphere and driving an optimistic spirit. As the Central Ohio Region attracts more economic development and population growth, our leadership and voice will help drive a prosperous and sustainable future.

Recognizing the barriers that many historically marginalized, disadvantaged, and underserved communities face across the region, MORPC is committed to advancing a more equitable future through ongoing internal work, initiatives, and adhering to federal mandates including Title IV of the Civil Rights Act of 1964, Environmental Justice, and Justice 40.

MORPC reaffirms its commitment to diversity, equity, and inclusion by addressing inequities through our programs and initiatives. Examples include:

- Regional Collaboration: Convenes and facilitates regional conversations with local governments and community partners to promote collaboration and urgent effective action.
- Transportation & Economic Development Initiatives: Ensure everyone has equal access to education, jobs, healthcare, and other community resources.
- Residential Services: Provide free services to populations historically underserved and overburdened with energy and housing costs.
- Planning & Sustainability: Improve air quality conditions that disproportionately affect vulnerable populations.
- Data & Mapping: Identify trends and disparities to improve opportunities for resources for everyone.
- Regional Housing Strategy: Collaborate with local governments and community partners to identify gaps in affordable and sufficient housing to meet the current and future market demands of the Central Ohio Region.
- Outreach & Engagement: Promote opportunities for historically underserved and underrepresented communities to provide feedback on transportation projects, strategies, and initiatives and be actively involved in the planning process.

Despite MORPC's expertise for capacity building, we are seeking additional federal assistance to respond to the region's needs, outlined in the RHS, in a way that matches the urgency required to uplift affordable housing. This assistance will ensure that residents of Central Ohio can continue to afford living and working here, rather than moving to the more affordable and distant suburbs.

i. Describe your efforts so far to identify, address, mitigate, or remove barriers to affordable housing production and preservation.

The Regional Housing Strategy for Central Ohio

The RHS encompasses a 7-county region comprised of 194 jurisdictions. Communities range from the City of Columbus, home to over 905,000 residents across 226 square miles, to rural townships and villages smaller than one square mile with fewer than 100 residents. With such diversity among its communities housing needs, challenges, and experiences vary greatly across Central Ohio. So, too, does funding, resources, legislative authority, and capacity.

The RHS was designed to be responsive to these variations, supported by three novel analyses which built upon and incorporated findings from 29 local and regional plans and studies. Analyses of demographic and economic trends, housing needs, and market conditions were conducted to understand existing and projected future conditions across the Central Ohio housing market. These include a housing submarket analysis, a gentrification and displacement risk analysis, and an opportunity analysis.

The analytical results were vetted and strengthened by feedback from representatives of the project advisory board: an approximately 100-member board representing nearly 50 local governments, real estate developers, businesses, financial institutions, and non-profit organizations. The RHS underwent further “ground-truthing” through stakeholder workshops and a community survey. Through this data-intensive process, the RHS identified five core issues behind Central Ohio’s growing housing supply and affordability crisis. These include:

- Increased competition for homes, as the demand for homes at all prices outstrips supply.
- Barriers limiting access to homes, namely the discrimination many Central Ohio residents – particularly Black residents – face in the real estate market and in lending practices.
- A limited supply of homes priced for low-income households, both in terms of new construction and naturally occurring affordable housing.
- Demand for homes that serve a wider range of ages, abilities, and household sizes as Central Ohio’s growing population diversifies.
- Housing instability, as measured by the region’s rates of evictions, homelessness, and housing cost burden.

Housing issues are not new to the region. In fact, most are well-documented in previous reports cited by the RHS. The RHS set out to deepen the region’s understanding of these issues, and to investigate the barriers holding the region back from addressing them. Barriers like:

- Not-in-my-backyard (NIMBY) attitudes and negative perceptions about housing density and affordability, resulting in a lack of public and political support that affects development feasibility in Central Ohio.
- Uncertainty associated with local land use processes and standards, driven by significant variations across communities with little centralized information to help navigate the process. This increases the time and cost of development.
- Increasing costs of residential development, including land costs, site selection, and regulatory costs. Such costs can decrease production, particularly of housing at lower price points.
- Need for more assistance than available resources, across multiple fronts. From rental assistance to support for home repairs, demand exceeds available program resources. This need plays out in the region’s housing finance landscape as well, where limited gap financing has created an over-dependence on Low-Income Housing Tax Credits to produce affordable housing in the region.

While these issues are not unique to Central Ohio, the solutions to address them must be. The Implementer’s Toolkit, which accompanies the RHS, lays out 111 actions to address housing

production, preservation, and affordability.³ Each action was selected for its ability to be started or scaled in Central Ohio, based on legislative authority, local market conditions, and capacity. The defining characteristics of the housing submarkets analysis, layered with findings from the opportunity analysis and gentrification and displacement risk analysis, were used to align every action to individual Census Tracts throughout the region.

RHS advisory board members agreed that regional tasks are more effective when shaped at the local level. That approach, in turn, should lead to broader support from communities throughout the region. Likewise, a diverse region speaking with one voice will most effectively carry a message at the state level.

Participants also agreed that government and policy voices carry further when they are backed by the private and non-governmental organization (NGO) sectors – stressing the idea that addressing housing issues is good for economic development, a stable workforce, public education, and many other economic and social benefits.

Respecting this reasoning, the RHS advisory board filtered among the broad menu of actions within the Implementer’s Toolkit to prioritize a strategy for each of the five core regional housing issues. The following rose to the top as Priority Actions:

- Adopt “green tape” development review processes to address increased competition for homes.
- Provide more tenant-based rental assistance to address housing instability among Central Ohio residents.
- Enact source of income laws, or otherwise expand fair housing laws, to remove barriers limiting access to homes.
- Create a state housing tax credit to support housing development for low-income households.
- Pilot the development of diverse, lower-cost housing products that leverage innovative design and construction techniques to address the demand for homes serving a wider range of ages, abilities, and household sizes.

In the three years since the RHS was produced, Central Ohio has made progress on these and other actions from the Implementer’s Toolkit. However economic challenges, such as rising interest rates, and opportunities including major regional economic development investments (such as a critical Intel manufacturing facility), have changed the field of play for Central Ohio. Relative to economic growth, Central Ohio is producing too little housing. At 0.57 housing units permitted per job created, the region’s production rate is well below the 0.9-1.0 homes per job ratio considered to be necessary for a healthy housing market.⁴ At the same time, new and expanded facilities by Honda, Hyperion, Intel, the Ohio State University, and others have increased MORPC’s projections for future job growth by over 20%, from 294,000 to 357,000 by

³ MORPC Regional Housing Strategy Implementer’s Toolkit <https://www.morpc.org/regional-housing-strategy-implementers-toolkit/>

⁴ MORPC, Derived from US Census Bureau 2010 and 2020 Decennial Census; US Census Bureau Building Permits Survey

2050.⁵ The timeline to address affordable housing production and preservation has accelerated, requiring MORPC and regional stakeholders to seek external resources – such as this grant – to meet necessary housing needs.

LinkUS Mobility Initiative

At MORPC, we know that housing and transportation are inextricably linked. To support its growing population, Central Ohio cannot simply “build its way out of” a shortage of housing affordable to current and future residents. Considering the reality of rising prices for housing as well as other essentials like gas, food, and more, MORPC, our members, and partners are working to balance this reality with the need to support the community’s desire for enhanced transit and mobility options. This intention matches much of the planning, implementation, and decarbonization strategies outlined in the U.S. Transportation Decarbonization Blueprint.

Enter the LinkUS initiative, a proactive plan to accommodate Central Ohio’s population growth with rapid transit solutions and transportation options, which include faster, more reliable public transportation, safe and expanded bike and pedestrian paths, and walkable communities with more affordable access to work, home, and entertainment. To implement this program, MORPC works with the Central Ohio Transit Authority (COTA), Franklin County, and the City of Columbus.

As we embark on a new mobility initiative, the impacts of past policies and programs must be at the forefront of our thoughts. Our infrastructure investments and growth patterns over the past 70 years now show their age, and the unintended consequences on current and future generations have become clearer. Past policies have created an urban form in Central Ohio that wastes taxpayers’ money on infrastructure that, over the long run, is increasingly expensive to maintain while yielding a low return on investment. Our land use policies have reduced housing affordability, with housing costs consuming a higher allocation of family budgets, therefore decreasing the purchasing power of households. The transportation system is the leading contributor of greenhouse gas emissions, with health consequences for our residents and planet. Discriminatory housing policies, suburbanization, and interstate highway construction has had disproportionately negative outcomes for minority residents.

As we work to make new investments in our mobility system, we must reconcile the negative outcomes of our past decisions and prioritize equitable and sustainable mobility investments in the future. LinkUS will include aligned investment in housing and preserve valued community resources that create vitality. LinkUS will conserve jobs and create new business and job creation opportunities. LinkUS will bring opportunities for prosperity to our residents who have suffered due to redlining, housing, and transportation policies that have divided our communities. LinkUS will promote a more efficient form of growth, ensuring good stewardship of public resources and a higher quality of life in our region.

By creating an integrated mobility system, LinkUS will increase access to jobs, schools, healthcare, and activities for all, making the region more equitable while positioning Central

⁵ MORPC 2024-2050 County Population Forecasts

Ohio as a desirable place to live and work and allow the region to better compete economically. Importantly, LinkUS is designed to advance existing initiatives, including the Regional Housing Strategy, that are working to improve housing, poverty, safety, and climate action.

MORPC Residential Services

MORPC's dedication to addressing housing supply and affordability needs in Central Ohio extends much further than coordinated policies and plans. For over thirty years, MORPC has provided home repair and weatherization services to Central Ohio households that have helped preserve and stabilize naturally occurring affordability. Several iterations of home repair and weatherization programs have served the community.

MORPC's Home Repair programs serve owner-occupied single-family homes with household incomes at or below 80% area median income (AMI). Services include the following:

- Franklin County Urgent Needs Home Repair – Qualified applicants are eligible to receive up to \$25,000 in home repair services. These repairs generally focus on health, safety, and sustainability measures. Examples include, but are not limited to, roof repair/replacement, ADA-accessible bathrooms and ramps, window replacement, downspouts and gutters, and some foundation repairs.
- Healthy Homes – This program addresses health items within the home such as mold remediation, radon, and home maintenance.
- Franklin County Public Health/Ohio Department of Health Lead Grant – This program provides lead detection and removal services, with an emphasis on serving homes with children living in them.

Over the past five years, these Home Repair programs together have served an average of 60 homes annually.

MORPC's Weatherization programs serve families earning at or below 200% of Federal poverty guidelines. The primary purpose of home weatherization is to reduce energy cost burdens for Franklin County and Central Ohio residents. Services include the following:

- Columbia Gas WarmChoice – This program serves anyone in Franklin County who meets income requirements and whose home has gas-powered appliances. Primarily aimed at owner-occupied units, rental units may be served on a case-by-case basis. All gas appliances are inspected for health and safety. Additional testing such as blower door tests and infrared insulation testing assess the home for energy efficiency. Participants are eligible for free repair and/or replacement on items such as furnaces and hot water tanks. Additional energy-saving measures, such as insulation and weather stripping, can be administered.
- Home Weatherization Assistance Program (HWAP) – Funding for HWAP is provided by the State of Ohio and directed to eligible ZIP codes. Services provided are similar to the WarmChoice program, however, MORPC can serve homes with appliances which are powered by electricity and other non-gas fuels.

Over the past five years, the Weatherization programs together have served an average of 500 homes annually.

ii. Do you have acute demand for affordable housing? What are your remaining affordable housing needs and how do you know?

According to the Columbus-Franklin County Joint Analysis of Impediments to Fair Housing Choice (2019), about 38% of households are experiencing at least one housing problem, and approximately 20% of households have a severe need. Moreover, the report cites research showing 43.2% of renters in the Columbus metropolitan area spend more than 30% of their income on housing and 23.2% spend more than 50% of their income on housing. Preliminary insights from MORPC, Franklin County, Columbus, and other partners give us reason to believe these numbers have only increased since 2020.

For over ten years, Central Ohio has not built enough new homes to keep up with the demand driven by its population growth. The Building Industry Association of Central Ohio projects a need for at least 14,000 additional residential building permits per year through 2050 to keep up with current growth projections – an approximately two-fold increase from recent permitting trends.

Despite fluctuations in Central Ohio’s housing market, sales prices continue to climb while supply continues to dwindle. In August 2020, the median sales price of a home in Columbus, Ohio was \$243,000. In August 2023, the median sales price of a home climbed to \$316,995, an increase of over 30%. Over the same time period, the number of in-contract home sales dropped by 15%, indicating a decrease in the availability of for-sale homes.⁶ While median household income also increased to \$75,777 (through 2022, the most recent data available), the percent change is much smaller at 5%.

Although MORPC’s home repair and weatherization programs serve well over 500 households annually, these programs maintain a steady waitlist of approximately 200 households in need. These households are representative of a larger challenge: the region’s supply of naturally occurring affordable homes is shrinking. Such homes are vulnerable to slipping into a state of disrepair which, if unaddressed, forces families to leave. This creates two problems: first, households must try to find a new place to live among limited affordable housing options, often at greater expense than their current living situation. Second, the affordable home in disrepair is often purchased, rehabilitated, and sold (or “flipped”) at a much higher price, no longer affordable to the area median income.

iii. What key barriers still exist and need to be addressed to produce and preserve more affordable accessible housing?

The core housing issues and barriers to producing more affordable accessible housing listed above and first identified by the Regional Housing Strategy in 2020 were exacerbated during the pandemic. These issues and barriers persist in our region today.

⁶ Columbus Realtors Local Market Updates, August 2021 and August 2023

Despite the region's efforts to address NIMBY attitudes through education and outreach, negative perceptions about new residential development continue. Central Ohio is experiencing backlash against all forms of development, particularly residential construction. In some cases, residential development proposals have faced a voter referendum, initiated by petition. In cases where the ballot measures resulted in residents "vetoing" the development, the consequences include costly legal battles and a loss to the market of much-needed housing.

Perhaps due to this resistance, Central Ohio communities have struggled to apply consistent decision-making to the development approvals process. In these cases, developments may receive feedback to reduce the number of units or garner a "no" vote from elected leadership, despite meeting zoning requirements. This uncertainty associated with local approvals adds time to a development process that is already lengthy: MORPC and BIA estimated the average length of time, from site selection to certificate of occupancy, takes between 30 to 50 months for single family construction and even longer for multifamily construction.

The added time of a lengthy approvals process equates to added development costs on top of the increasingly prohibitive costs of labor, materials, and land. Current interest rates, while key to reducing the risk and uncertainty of inflation, also contribute to higher development costs, putting pressure on developers to find additional sources of financing; a burden disproportionately facing affordable housing developers.

These issues are experienced by all residential developers, whether they are building homes for sale in the real estate market or homes which are built with subsidies for income-eligible occupants. However, the challenges are magnified when the goal is affordability. Homes built with traditional construction methods generally cannot be built at a cost that makes them saleable to the median income household. For developers of affordable housing, a popular solution is to seek subsidies to offset development costs, creating affordability which is passed on to the occupant.

A more pragmatic approach would be to build units at a lower cost with innovative techniques, preserving those funds traditionally used for developer subsidy to, instead, build more units. Ideally, such innovative designs should then be replicated and permitted by right in priority locations to scale their production across the region, creating a pathway to homeownership for moderate-income earners. Yet, in Central Ohio, local regulations often do not allow for innovation in construction methods or site design. Minimum lot sizes, square footage, building materials and other requirements challenge innovation as much as they challenge affordability.

Just as important as increasing the region's rate of new home production is preserving the region's dwindling stock of homes affordable to moderate- and lower-income households. Yet funds for preservation of affordable housing are extremely limited. As noted above, although MORPC's home repair and weatherization programs serve well over 500 households annually, these programs maintain a steady waitlist of approximately 200 households in need. The barrier to serving these households is simply a matter of funding availability.

Exhibit D. Soundness of Approach

i. What is your vision?

Although Central Ohio has made progress on the actions of the RHS Implementer's Toolkit, a shortage of housing at all prices, particularly for lower- and moderate-income households, has increased in the years since the RHS was produced. Adding urgency to the challenge is Central Ohio's continued robust growth and recent major economic development investments, anticipated to generate thousands of construction-related and permanent jobs.

The proposed vision will directly address the core issues and barriers identified above with a strategy to maintain existing affordable housing and bring more affordable housing online more quickly in priority neighborhoods that have access to transit and job centers – and which are at risk of continued loss of affordability as development pressures persist along these corridors.

The following outlines MORPC's comprehensive vision to support the construction of affordable innovative residential construction to unlock home ownership opportunities for moderate income-earners, and to preserve existing affordability within the HUD-identified priority geography of Franklin County.

1. Update the RHS analyses and convert them into tools for local governments. Communicate findings with outreach.

The housing submarkets analysis, gentrification & displacement risk analysis, and opportunity analysis of the Regional Housing Strategy are key to understanding the impacts of market conditions and public and private investments on neighborhood change. These analyses identify neighborhoods whose residents are at greatest risk of displacement due to such changes.

Updated analyses are urgently needed to accurately reflect current housing market conditions and characteristics of neighborhood change. This information must be current to identify neighborhoods at risk of resident displacement today and in the future due to market conditions and neighborhood changes. However, due to limited resources, the analyses have not been updated since they were produced for the RHS in 2020.

Since 2020, Central Ohio communities have experienced rapid acceleration of housing sales prices. Many Franklin County neighborhoods which displayed some indicators of neighborhood change prior to the pandemic are suspected to have been subject to some of the most dramatic changes in the years since. These same neighborhoods have historically been home to larger proportions of lower-income and non-white households with low access to opportunity. The rapidly changing market conditions are driven by a combination of factors including population growth and housing underproduction, hastened by institutional investors capitalizing on "Midwest affordability" and betting on major economic development investments by international corporations such as Intel and Honda.

Updated RHS analyses are urgently needed to assist local governments in responding to housing instability, evictions, and homelessness, which disproportionately affects these residents. To provide that assistance, MORPC will convert these updated analyses into tools for local

governments to identify the highest-risk neighborhoods within their jurisdictions. These tools will help local governments direct their resources to stabilize and mitigate resident displacement from within these neighborhoods.

MORPC will share the findings of these updated analyses with Central Ohio local governments and community partners through presentations, workshops, and other forms of outreach. These communications will include training on how to utilize the tools, empowering local governments to identify the neighborhoods within their jurisdiction which are experiencing market-driven changes and helping them to most effectively direct limited resources to stabilize neighborhoods at greatest risk of resident displacement and housing instability because of those changes.

As the regional council for Central Ohio, these updated analyses and user-friendly tools will allow MORPC to serve the 85 member communities of Central Ohio, many of which are small jurisdictions without the staff capacity or technical skills to acquire or interpret this data on their own.

The updated analyses will also play a critical role in establishing criteria for and identifying priority neighborhoods where innovative housing design (see item II) would be most impactful.

2. Innovative housing design pilot

Real estate ownership is often the first step toward generational wealth. However, this is an opportunity which low to moderate-income earners are not able to experience due to the high costs of housing in Central Ohio. These disparities are even greater among households of color, particularly Black residents, in our region.

In Central Ohio, there are limited opportunities for a moderate-income household to purchase a safe, decent, and sustainable home in the market. We can improve opportunities through innovative construction techniques capable of producing more units at a lower cost than traditional methods.

With funding from the PRO Housing grant, MORPC will provide 8 – 14 affordable homeownership opportunities through alternative build designs that reduce the total development costs of the project. The reduced development costs of homes built through the Innovative Housing Design Pilot lower and potentially eliminate the need for subsidy. Funds traditionally used for the affordability gap can now be used to build more units for affordable home ownership opportunities.

To further reduce household costs, this project will marry innovative housing design with transportation via the LinkUS initiative. MORPC will work with Central Ohio Community Improvement Corporation (COCIC), Franklin County's land bank, to identify potential parcels within ½ mile along the LinkUS corridors to construct innovative affordable housing. Securing properties through the COCIC land bank will reduce acquisition costs. Without additional leveraged funds, MORPC expects to build three to four units annually. MORPC will look to create a land trust model and/or create restrictive covenants that will allow for the finished product to remain affordable in perpetuity or for an extended time.

The challenge with innovative design techniques is how to appraise their value. MORPC will work with key financial partners in the predevelopment stages to determine underwriting and appraisal guidelines for non-traditional building design. MORPC also proposes to work with financial institutions to explore additional grant opportunities, leveraging more dollars to make more homes at scale.

MORPC will either function as the developer or contract with a developer to build the units funded through this program. In the case MORPC functions as the developer, MORPC will issue a request for proposals or specifications to bid from developers. If MORPC contracts with a developer, MORPC will provide the developer with guidelines and recommendations for the build.

The goal will be to have total development costs at or below an amount that, if the home were to be sold, a household making the median average income of the area could afford to purchase the unit. While traditional stick-built designs will be accepted, alternative build designs such as cargo containers, passive heat build systems, smaller homes, modular construction, and 3D printed homes will be encouraged. Any alternative build designs will be considered if they can reach the total development costs noted in the RFP, integrate Universal Design principles, and pass the required building code and inspection process. Due to MORPC's relationship with the City of Columbus, we will also work with the city in pre-development stages to discuss permitting, build design, and code when building non-traditional units.

The innovative housing designs used in this project will serve as a pilot to demonstrate how innovative techniques can be scaled and built in communities across Central Ohio, without subsidy, to directly respond to the lack of affordable units in the region. Potentially, these lower-priced, owner-occupied affordable housing units can provide a path to generational wealth that otherwise would not be available.

Below is an artist rendering of what a potential community at full scale could look like based on innovative housing design.

INNOVATIVE HOUSING EXAMPLE



- 1**
All stick-build homes; Mix of Single and Multi-Family stick-build homes
Market Rate: Affordable Housing and Subsidized, Potentially some Rental
- 2**
Community Garden, Raised Beds;
Addresses Food Deserts
- 3**
Cargo Builds
- 4**
Miniature/Micro Builds
- 5**
Modular/Manufactured/Concrete
- 6**
Passive Heat/One-Offs
- 7**
Additional Development Space



3. Produce standardized zoning code language and green tape development review process. Support implementation in Franklin County communities with technical assistance.

Innovative construction techniques are key to unlocking home ownership opportunities among more Central Ohio residents. However, innovation does not on its own correlate to affordability. To achieve affordability at scale, these homes must be built quickly and with some regularity in communities across Franklin County. To make that possible, communities must be prepared to welcome these approved designs with housing-supportive zoning codes and a permitting process which cuts through the proverbial bureaucratic “red tape” to facilitate development review, approvals, and ultimately, construction – a process the RHS refers to as “green tape development review.”

MORPC members are eager to make housing more accessible to their residents. However, staff capacity, financial resources, or technical skills are often barriers. As communities seek to update their comprehensive plans, zoning codes, and development review processes to be more housing-supportive, the MORPC Community Based Planning Assistance program is designed to support Central Ohio communities with professional planning services to manage increased workloads and make it easier to access consultant services for long-range planning efforts.

With HUD PRO Housing funds, MORPC will engage the services of a consultant to write standardized zoning language – intended for adoption by Franklin County jurisdictions – to permit the residential designs of the Innovative Housing Design Pilot. As stated above, MORPC

staff will provide technical assistance to Franklin County jurisdictions to support the other elements of this task through the Community Based Planning Assistance program:

- Engage the services of a consultant to write standardized zoning language which permits the approved designs in residential-zoned districts within ½ mile of a LinkUS corridor.
- Produce standardized “green tape” development review process which expedites the local development review process for approved innovative housing designs.
- Support local governments in Franklin County to utilize the RHS analysis tools created in Task 1 to identify neighborhoods at risk of resident displacement. The findings will be overlaid with Justice 40 maps and LinkUS corridors to identify locations where pre-approved designs can be implemented within ½ mile of a LinkUS corridor.
- Provide technical assistance to Franklin County communities to implement zoning language and green tape development review processes to facilitate construction of innovative designs in these priority locations.

4. Preserve naturally occurring affordable housing with expanded home repair and weatherization services.

Weatherization and Home Repair are key components of preserving Affordable housing units. Weatherization measures on some units can reduce energy costs to the point that the home is now affordable. On older units that lack insulation, using energy efficient furnaces and hot water tanks can create comfort and manageable energy bills. Through the thorough weatherization inspections, hazardous and faulty equipment can be tagged and remedied before accidents, leaks, and dangerous situations occur. Often, these inspections are the only way that hazards are discovered and remedied for the home occupant. This award will leverage existing program funds to hire an additional staff member, employee compensation or for additional fringe and overhead support. These additional funds help to complete the weatherization work that keeps the region's most vulnerable residents safe, comfortable and in decent affordable housing units.

Home Weatherization:

A portion of these funds would be used to help the existing weatherization program. Over the past year, the State of Ohio has asked MORPC to take on additional weatherization territories. MORPC has also received additional funding through the Bipartisan Infrastructure Law. Unfortunately, the funds received for the expansion of these programs do not provide enough administrative dollars required to hire additional energy auditors to complete the expanded workload. These funds would be used to hire an additional employee, and/or compensate current staff for additional workload. Funds may also be used to cover increasing fringe and overhead costs.

Home Repair:

A portion of this funding would be used for administrative support. The remaining would be used to provide home repair grants for approximately 8-12 existing homeowners along the LinkUS corridors who we are providing additional affordable housing opportunities to through

the innovative housing portion of the grant. This is an opportunity for existing homeowners in these areas to benefit from the affordable housing work taking place in their communities.

ii. What is your geographic scope?

The geographic scope for this proposed program is Franklin County, Ohio. All tasks outlined above and funded by the HUD PRO Housing grant will be delivered within Franklin County. Identified by HUD as a priority geography, Franklin County comprises the City of Columbus and numerous suburban cities as well as smaller villages and townships with a total population just under 1.4 million. All jurisdictions within Franklin County will be eligible to participate in this program. Communities along LinkUS corridors will be prioritized.

The existing home repair and home weatherization programs have distinct boundaries set by their funders. While these programs will leverage existing funds as part of this proposal, weatherization services must be provided within existing program boundaries (Franklin County communities not served by the City of Columbus). Funds received through this grant for home repair, however, are not held to the same boundary restrictions and can instead be directed to households in Franklin County with close proximity to innovative housing developments.

MORPC, as a regional council, serves over 80 local agencies. This pilot program is designed to be delivered in Franklin County but will provide benefits to communities across Central Ohio. For example, the geographic scope of the Regional Housing Strategy comprises the seven-county region of Franklin County and its six adjacent counties. Updates to the RHS analyses, and their conversion into new tools, as outlined above, will support decision making and resource prioritization in these communities.

iii. Who are your key stakeholders? How are you engaging them?

Regional Housing Strategy

The issues elevated by the Regional Housing Strategy are top-of-mind for Central Ohio communities. MORPC continues to engage with its RHS advisory board members and housing partners on the core housing issues and menu of actions to address them. The advisory board represents nearly 50 local governments, real estate developers, businesses, financial institutions, and non-profit organizations. Key activities dating back to the development of the RHS include:

Stakeholder Meetings

Engagement of the RHS Project Sponsors (representatives from among 26 partners who provided financial support for the development of the RHS) and RHS Advisory Board (subject matter experts representing over 50 organizations with direct and indirect experience with housing and related issues in Central Ohio) across all tasks completed for the RHS. The stakeholders provided ongoing feedback to MORPC about the overall direction of the RHS, including data analysis related to existing and future housing needs and potential actions to address regional housing needs. Stakeholder engagement kicked off at separate RHS Project Sponsors and Advisory Board meetings in August 2019. Beginning in February 2020, these two groups merged into one collective body. Over the course of the project, the stakeholders convened eight

times, with five meetings taking place in-person prior to moving to remote-only engagement in March 2020 in response to limitations posed by COVID-19.

Regional Workshops

Engagement of representatives from local governments, housing service providers, and faith-based and cultural institutions, among others, about implementation considerations for actions proposed in the Implementer's Toolkit. In June and July 2020, the RHS project team convened four regional workshops with community leaders to gather feedback and input on proposed housing actions, organized by geography: Franklin County; Madison and Union Counties; Fairfield and Pickaway Counties; and Delaware and Licking Counties.

Real Estate Developer Survey, Focus Group, & Interviews

Targeted engagement of representatives of the residential real estate development community in Central Ohio. Developers represented for-profit and non-profit organizations building single-family and multi-family housing. Engagement of the real estate development community took place in Fall 2019 and Winter 2020. Feedback from these engagements was incorporated into Technical Report #1 and the Investment Portfolio & Recommendations.

Real Estate Lenders Survey and Funders Workshop

Targeted engagement of representatives from financial institutions, organizations, and governments in Central Ohio that administer local and regional resources to seek input on considerations for actions related to funding and investments proposed in the Implementer's Toolkit. Engagement of financial institution representatives and local and regional government administrators took place in Spring and Summer 2020. Feedback from these engagements were incorporated into Technical Report #1 and the Investment Portfolio and Recommendations.

MORPC Members Workshop

A workshop open to all MORPC members within the seven-county study area for the RHS. Attendees of this July 2020 workshop participated in a facilitated discussion on the core regional housing issues, opportunities, and challenges related to development and financing and regional variations. Participants were asked to provide input on local governments' capacity to implement the actions related to policies and regulatory changes proposed in the Implementer's Toolkit.

Informant Interviews

Facilitated discussions with key individuals representing specific housing-related perspectives. Throughout the project, the RHS project team interviewed individuals whose work includes providing services to persons experiencing unique housing-related challenges, housing providers, K-12 educators, human trafficking survivors, and staff of a housing mobility pilot program. Responses from each interview were summarized and used to augment the quantitative data analyses performed for the RHS.

Community Survey

Online survey of community members (institutional and community “grasstops” leaders) and housing stakeholders (including the RHS Project Sponsors and Advisory Board) about current housing conditions in Central Ohio.

MORPC distributed the survey to members of their mailing lists, and recipients were encouraged to share the survey with their networks, including those who access housing services and support. The survey, which used a skip logic model to differentiate responses among community members and housing providers, was open from October 13th to November 8th, 2019, and received 902 responses. Information from this survey helped identify and refine the five core regional housing issues which guide the RHS.

Ongoing engagement has taken the form of an online speaker series, community workshops and presentations, and special educational events for MORPC members.

Regional Housing Coalition

In addition to its regional leadership of the RHS, MORPC also leads the Advocacy & Partnerships task force of the Regional Housing Coalition. The Coalition is convened by the City of Columbus, Columbus Partnership, and Affordable Housing Trust to identify and implement actions that address the region’s core housing needs. The intent is not to duplicate efforts, but rather to build capacity for existing regional entities and resources through regional collaboration. One of four work groups tasked with recommending priorities to the convening partners, the Advocacy & Partnerships task force specifically was formed to develop a coordinated regional approach to collaboration and support for increasing the region’s supply of housing.

At a work session earlier this year, 50 participants gathered to answer the question of how best to implement the RHS at the regional level. The task force emphasized the need for capacity-building, regional coordination, community education and resources, and sustainable funding. These recommendations were delivered to the Coalition convening partners.

LinkUS Initiative

Together with the Central Ohio Transit Authority, Franklin County, and the City of Columbus, MORPC is an implementing partner of the LinkUS initiative. This initiative includes robust stakeholder engagement. The 2022 Community Action Plan memorializes the initiative’s commitment to including and engaging groups and communities that have been historically marginalized and underrepresented in similar efforts.⁷ Community participants representing diverse perspectives in the regions are engaged through focus groups, participation in meetings and presentations and by leveraging their networks to expand participation.

Public engagement includes regional outreach to jurisdictions within Central Ohio. More specifically, at least 19 jurisdictions located in COTA’s service area have provided input regarding their unique needs for both mobility and coordinated development. Dialogue between

⁷ LinkUS Community Action Plan https://linkuscolumbus.com/wp-content/uploads/2022/06/LinkUS-Community-Action-Plan220623_small.pdf

the jurisdictions, community members, and LinkUS will continue as the project navigates from planning to implementation.

LinkUS also leverages online engagement tools, including a website and social media presence, to help spread the word. To date, more than 6,000 community interactions have occurred. At the time of publication, 23,500 people had visited the project website and/or engaged online. LinkUS has also garnered media coverage in a wide variety of local and regional outlets.

iv. How does your proposal align with requirements to affirmatively further fair housing?

MORPC's proposal aligns with, and implements recommendations from, the City of Columbus-Franklin County Joint Analysis of Impediments to Fair Housing Choice (2019). In particular, zoning is identified in the Analysis as a known barrier to affordability and fair housing choice which results in increased housing costs for renters and owners. Zoning requirements such as minimum lot size or building square footage, and other criteria such as maximum density thresholds, inflate development costs. MORPC's proposal directly addresses this barrier with technical assistance to help communities implement zoning code language which will permit low-cost Innovative Housing Designs along LinkUS corridors, and a standardized green tape development review process to eliminate the need for any variances and streamline the approvals process.

As the Analysis notes, much of Columbus and Franklin County's publicly assisted housing tends to be located in areas with lower-scoring access to opportunity indicators such as educational institutions, labor market engagement, and childcare. This proposal's Innovative Housing Design Pilot focuses new development on the LinkUS corridors: key transportation thoroughfares which touch multiple communities, including high-opportunity neighborhoods, regional job centers, and centers of learning and skills training. This strategy, which leverages the LinkUS objectives to construct a complete, connected, comfortable multimodal transportation network through Franklin County, allows us to affect an entire region and touch multiple demographics, including varying economic and racial compositions. With the LinkUS corridors reaching a variety of communities, this ensures that there will be diverse areas based on racial and economic composition that can benefit from this initiative. This way, all efforts are not concentrated in low opportunity areas that already have affordable housing options.

MORPC plans to remove barriers to the development of affordable housing by engaging communities through their civic associations and relationships formed by being members of MORPC. By providing plenty of time for community members to learn and ask questions about proposed non-traditional builds, this will help alleviate some of the NIMBY-ism associated with affordable housing being developed in more affluent areas. By creating a product that can be purchased by families that are at median income guidelines, MORPC believes that they are organically removing the primary barrier that stops underserved groups from being able to purchase homes, which is cost.

Innovative housing design home specifications will require Universal Design. Therefore, all properties will have ADA accessibility as well as floor plans with at least 2-3 bedrooms to promote opportunities for homeowners. MORPC would be able to actively promote this program

through radio and print advertisements, social media, and our relationships with over 80 member communities in the region. MORPC will also work with other local non-profit housing organizations such as Homeport, Homes on the Hill and Habitat for Humanity to share our information about affordable home ownership opportunities with their clients and Home Buyer Education participants. If MORPC were to receive only 50% of the requested funding, MORPC would have to reduce its production of homes while continuing to seek additional dollars to leverage to do more production.

v. What are your budget and timeline proposals?

1. Update the RHS Analyses and Convert into Tools for Local Governments. Communicate Findings with Outreach.

HUD PRO Housing Funds Requested: \$800,000

Total Cost: \$800,000

This task will begin immediately upon securing funding. It is estimated that updated analyses will take 12 months to complete, with up to six additional months needed to convert them to user-interfacing tools, along with development of outreach and educational materials to train local governments on their use.

2. Innovative Housing Design Pilot

HUD PRO Housing Funds Requested: \$5,875,000

Total Cost: \$5,875,000

Timeline: On award, the first year of the project will be dedicated to project ramp up, including considerations for housing specifications, and site acquisition as the RHS analyses are completed. The subsequent four years of the project will be reserved for call for bids/proposals, project development, construction, and sale of completed properties.

3. Produce Standardized Zoning Code Language and Green Tape Development Review Process. Support Implementation in Franklin County Communities with Technical Assistance.

HUD PRO Housing Funds Requested: \$2,800,000

Total Cost: \$2,800,000

Timeline: Anticipated to begin in Year 2 with a review of housing specifications for the innovative housing design pilot project. The task will continue through the fifth and final year of the project. Funding will be used to secure a consultant to support this task, with project management administered by MORPC. As sites are selected for the pilot project, MORPC, through its Community Based Planning Assistance program will provide technical assistance to jurisdictions to adopt and implement the standardized code language and development review process.

4. Preserve Naturally Occurring Affordable Housing with Expanded Home Repair and Weatherization Services

HUD PRO Housing Funds Requested: \$525,000

Home Weatherization: \$275,000

Home Repair: \$250,000

Total Cost: \$525,000

Timeline: These funds will be reserved for residential services to households near the innovative housing developments. As a result, it is anticipated that these services will begin between Years 2 and 3 once sites have been identified.

Exhibit E. Capacity

What capacity do you and your Partner(s) have? What is your staffing plan?

MORPC will lead this project with current and proposed new staff. MORPC will ensure the maximum extent of the HUD PRO Housing award goes directly toward preservation and production of affordable housing.

Task 1. Update the RHS Analyses and Convert into Tools for Local Governments

The following members of the Data Analytics section of the Planning Department will lead updates of the RHS analyses:

- Director of Data Analytics and Strategy (5% of overall project time)
- Data Research Officer (10% of overall project time)
- Data Analyst (30% of overall project time)
- Data Analyst – new position, grant-funded (55% of overall project time)
- MORPC provides many data needs throughout the Central Ohio Region, such as managing the data for the Regional Housing Strategy. As this data is still being managed by this team, it needs to be updated to ensure this tool is accurate. MORPC has the technical capacity to manage this update, as well as the discipline to ensure it remains up to date throughout this award process.

The following members of the Community Development section of the Planning Department will update the communications outreach products:

- Associate Director of Community Development (10% of overall project time)
- Principal Planner (25% of overall project time)
- Senior Planner (40% of overall project time)
- Intern (25% of overall project time)
- MORPC serves as the Council of Governments for Franklin County and has a strong presence throughout the Central Ohio Region. Utilizing outreach products is one way we establish our relationships with the many organizations throughout Central Ohio. This award would expand our reach, and new outreach products would help us advertise how we are strategically using this federal investment.

Task 2. Innovative Housing Design Pilot

- Director, Residential Services- Currently on Staff
- Residential Program Specialist- Currently on Staff
- Program Assistant- Currently on Staff
- Rehab Specialist- Currently on Staff

MORPC has a hands-on approach to housing in Central Ohio. Our residential services manage a team of experienced contractors who, cumulatively, have years of housing repair experience. These experiences will be utilized when considering the feasibility of innovative housing designs.

Task 3. Produce Standardized Zoning Code Language and Green Tape Development Review Process. Support Implementation in Franklin County Communities with Technical Assistance.

- Consultant – Anticipating \$1M of budget to consultant
- Community Development Senior Planner (50% of project time)
- Community Development Principal Planner (30% of project time)
- Associate Director of Community Development (20% of project time)
- Implementation will require coordination with planning staff and elected officials in the target neighborhoods in Franklin County. MORPC will convene local agency representatives to design an implementation strategy.

Task 4. Preserve Naturally Occurring Affordable Housing with Expanded Home Repair and Weatherization Services

Outside of weatherization, current staff has the capacity to perform expanded job duties. As opposed to hiring and training new staff, funds from this proposal will grant existing staff salary adjustments based on new job duties. In the past year, MORPC has increased its weatherization production goals to the point that workload will increase over 35%. For weatherization, funds would be used to hire additional staff or provide existing staff salary adjustments to compensate for increased workload.

Exhibit F. Leverage

Are you leveraging other funding or non-financial contributions?

Non-Financial Contributions

MORPC Staff – Residential Services

- Home repair – requested funds would be leveraged against our four currently funded home repair programs.

COCIC – land acquisition, strategic advisor.

Financial Contributions

Leveraged Funds – \$14,802,000

- Franklin County Urgent Needs –\$940,000
- ODH Lead Grant - \$250,000
- Healthy Homes Grant - \$2,000,000 (04/22-12/25)
- Affordable Housing Trust-\$60,000
- COCIC- \$100,000
- Columbia Gas WarmChoice - \$2,258,000
- HWAP ODOD - \$9,194,000 (A portion of this grant is funded by the BIL and will be spread over a four-year period. The exact amount, which has yet to be determined, is mandated by the State of Ohio.)

Pending Leveraged Funds (not calculated in the budget)

- Multiple pending sources could be used as leverage for financial contributions. This could include funding from multiple banks, as well as Franklin County. As funding from these sources becomes relevant, this framework will be used to describe the needs for these funds.

Exhibit G. Long-Term Effect

MORPC seeks to permanently remove key barriers to producing and preserving affordable housing through this proposed project. The updated data analyses and new tools for local governments will enable local governments to identify Census tracts within their jurisdiction with the greatest risk of resident displacement due to neighborhood change factors. The tools and associated outreach and engagement will help decision makers direct resources to the neighborhoods with greatest need and help to stabilize vulnerable households and preserve affordability. These same tools will also be utilized to identify priority locations along LinkUS corridors for construction of innovative housing designs. MORPC will measure its effectiveness in deploying the tools by quantifying the number of community engagements, workshops, trainings centered on the tools and quantifying the number of priority locations which are identified go on to participate in the innovative housing design pilot based on the analyses.

At its core, this project is about delivering a sustainable pipeline of affordable and accessible home ownership opportunities, currently out of reach to moderate-income earners, thanks to a partnership with the land bank and the innovative housing design pilot. Long-term, this model can easily flex to include a lease- and/or rent-to-own component to provide additional sources of safe, decent, affordable housing to renter and rent-to-own households. MORPC has already anticipated this potential program expansion and is prepared to serve as owner with property management services subcontracted to a licensed company, or to sell the properties to a non-profit for this purpose. MORPC will measure the effectiveness of the innovative housing design pilot by quantifying annually the: number of units produced under the affordability threshold, the number of closed home sales, and – should the program expand to include a rental option – the number of leased-up properties.

Together with tasks 1 and 2 above, MORPC will facilitate implementation of innovative housing designs with standardized zoning code language and a green tape development review process, and by providing technical assistance to Franklin County communities to implement them. By standardizing the code language and development review process, MORPC will create a replicable process which can be deployed across Franklin County, with an emphasis on key LinkUS corridors which have faced continued loss of affordability as development pressures persist. MORPC will measure the effectiveness of these standardized processes by quantifying the length of time from site selection to certificate of occupancy for each innovative housing design pilot project.

Finally, the proposed project will preserve existing – and rapidly dwindling – naturally occurring affordable housing. The requested funding will sustain MORPC's home repair and weatherization programs, and ensure more families are assisted in a shorter period of time. MORPC will measure the effectiveness of program delivery by quantifying the number of households served and the time-to-service. MORPC currently has a waitlist time of over a year on our Home Repair Program. These funds would allow us to help families immediately upon selection through the use of the innovative design program. Historically, these families would either potentially not qualify due to geographic location or go to the bottom of the waiting list.

Attachment A. Summary of Comments Received

As recipients of public funding, MORPC aims to cater projects to relevant stakeholders by soliciting public opinion and cross-industry collaboration. In alignment with our values and the application's public comment requirements, our team strategically sought input through virtual and in-person opportunities while ensuring accessibility for persons with disabilities and limited English proficiency (LEP). Specifically, our team hosted an open house, publicly posted our application, and offered multiple formats to receive comments. These efforts allowed our team to receive one comment, which we incorporated by including universal design principles and more inclusive language.

Our strategic approach to solicit public comments included publicly posting our draft proposal, providing an in-person and ADA-accessible open house presentation, producing digital and physical comment forms, and completing outreach to relevant members of MORPC's professional network. To notify the public, we shared our draft proposal, open house, and public comment form through a legal advertisement in the Columbus Dispatch, a local newspaper, on October 15th. We additionally shared this information on MORPC's website and social media platforms (Facebook and Instagram).

On Wednesday, October 18th, between 5:30 and 7:00 PM, we hosted an open house and presentation at MORPC's ADA compliant and wheelchair-accessible headquarters, with a LEP representative available to make relevant accommodations. To meet the needs of Columbus' large working population, we held the open house in a Columbus-central location within walking distance of a local bus stop and outside of regular business hours. We provided physical copies of our application, an overview of the grant, literature outlining the LinkUS public transportation project, physical comment cards, and a sign-in sheet for all guests in attendance. While we received one guest during our open house, we ensured the public had access to all relevant materials by making them available on MORPC's website.

To further solicit tailored feedback, we shared information regarding our application and open house to members of MORPC's network. These stakeholders include the non-profit Community Refugee and Immigration Services (CRIS), Director of the Ohio State University (OSU) Knowlton School of Architecture and Landscape, OSU Department Chair of Geography, the OSU Dean of the John Glenn College of Public Affairs, specialists at City of Columbus Department of Development, and Franklin County Department of Economic Development and Planning. While this outreach did not solicit any public comments, this outreach aligns with MORPC's commitment to creating policies and programs according to stakeholder needs and expert opinions.

To comply with Executive Order 13166 and HUD's "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," MORPC designated one LEP coordinator prepared to facilitate LEP accommodations upon request. Further, MORPC is prepared to provide necessary language accommodation in Spanish, Somali, and more with the help of our Diversity Inclusion & Engagement Officer and Communications & Engagement office. These

experts are prepared to ensure that no person is excluded from public participation based on their identity or abilities. While MORPC is equipped to make materials accessible to individuals with LEP, we did not receive any accommodation requests and, therefore, did not create documents in languages other than English.

During this public comment period, we received one comment and one open house attendee. This feedback suggested the use of universal design principles to provide more homes that serve a wider range of ages, abilities, and household sizes, which we researched and attempted to incorporate into our application. This comment also suggested a more effective language change, which we adopted into our application. Eager to gain more public input, we used this comment period as an opportunity to connect with subject specialists at the City of Columbus Department of Development and Franklin County Department of Economic Development and Planning. These contacts recommended that we strengthen the relationship of our proposal to the Columbus-Franklin County Joint Analysis of Impediments to Fair Housing (2019) into our application and future plans.

This final application, as submitted, responds to the comments MORPC received during the public comment period. The project vision now clearly states that innovative housing designs funded by this grant will incorporate Universal Design accessibility principles. The application now has a stronger and more direct connection to the Joint Analysis of Impediments to Fair Housing, notably in our response to the question, “How does your proposal align with requirements to affirmatively further fair housing?”