



PATHWAYS TO REMOVING OBSTACLES TO HOUSING

(PRO HOUSING)



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EXHIBIT A: EXECUTIVE SUMMARY (35 Points)

City of Gastonia

Affordable Housing Needs

Like many cities and townships in North Carolina, Gastonia continues to experience increasingly exponential growth. With the population surge, Gastonia is presented with its own set of unique challenges related to affordable housing, often resulting in limited to no options for many low- and moderate-income citizens. Addressing such barriers on a larger scale will take both time and a collaborative effort of local government, businesses and the community. The ultimate goal is to expand fair housing choice opportunities for the most vulnerable members of our community, those of low-to moderate income.

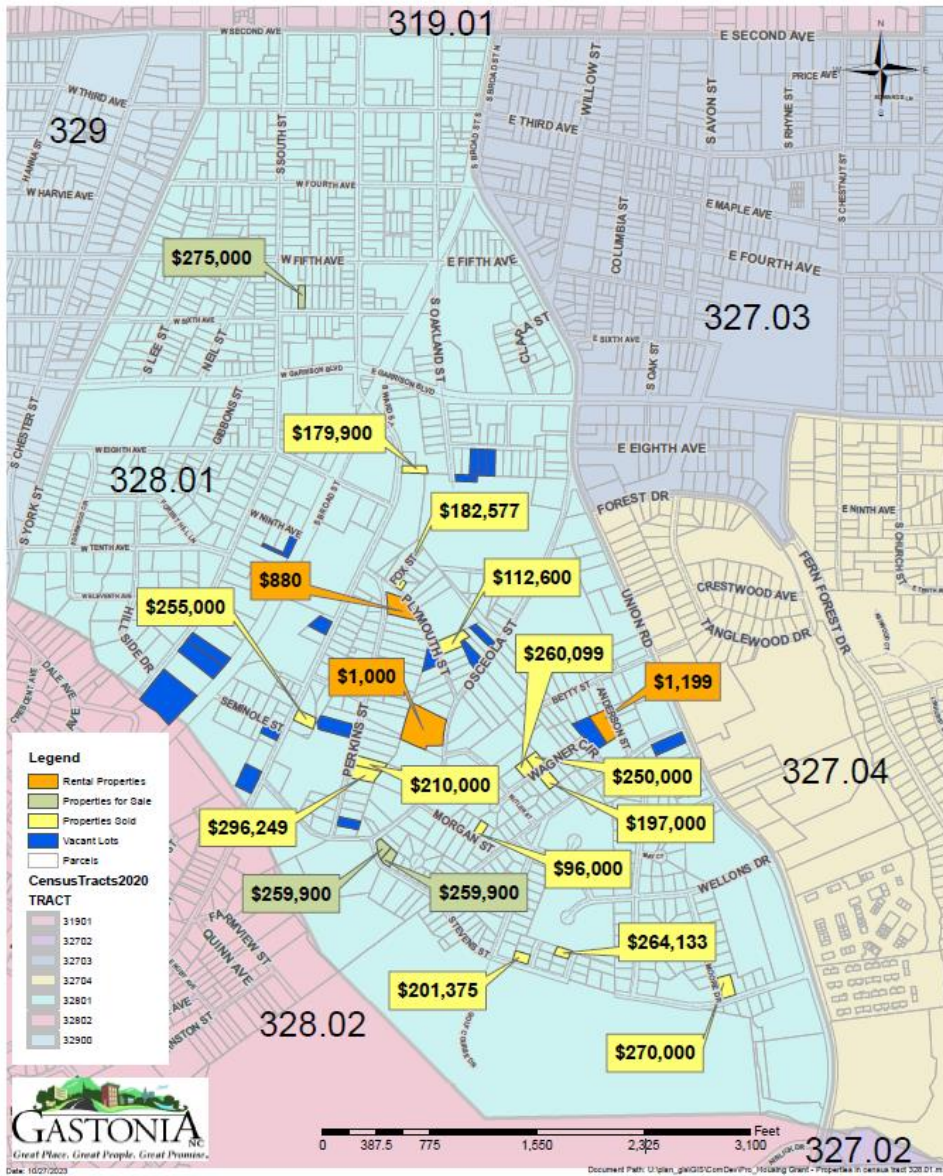
To better address current barriers, Gastonia continues to assess market conditions and its impacts on the overall community; identify and form collaborative partnerships; and identify funding to combat barriers to affordable housing. Within the past 36 months, there has been a substantial increase in the population segment of 0-50% of the AMI unable to afford decent housing. Gastonia households within the 0-50% AMI range experience the greatest challenges in acquiring affordable housing. There are still challenges, though not as great, for those persons in 51-80% AMI. Funding opportunities such as *Pathways to Removing Obstacles to Housing (PRO Housing) NOFO*, provides a vehicle to make a significant impact in Gastonia's housing dilemma. When considering the target program area of the Marietta Street/Osceola Street corridor, the percentage of overall need in the proposed target area is much larger in comparison to Gastonia.

Gastonia's 2025 Comprehensive Plan notes that historically, Gastonia's neighborhoods were integrated into the urban fabric of the city, organized around a grid street network, and closely situated to local businesses and employers, with public gathering spaces as integral components. Before World War II, when car ownership was less common, the city's neighborhoods were relatively dense and conveniently located near the city center, enabling residents to walk or bike to work, businesses, and amenities. During this period, textile mills constructed housing for their workers, and mill villages were typically within walking distance of the mills. Communities like the Loray (Firestone) Mill village had their own shopping areas. These neighborhoods varied in size, layout, and architectural styles and were often situated near other mills and their villages. South of the commercial district and toward the eastern end of Gastonia, neighborhoods were primarily occupied by non-textile workers, small business owners, and city employees. The African American community centered around Chester Street and York Street, while the city's professional, commercial, and industrial leaders built their homes near Franklin Street and York Street to remain close to the commercial center.

After World War II, increased car availability and the decline of public transportation led to a shift in living styles from urban to suburban. This shift resulted in larger lots, fewer sidewalks, and more self-contained neighborhoods. Shopping centers like Akers Center, Dixie Village, and Gaston Mall emerged, often requiring cars for access. This transformation had a significant impact on Gastonia's neighborhoods, leading to increased suburbanization and decreased urban density, ultimately affecting neighborhood connections to businesses, parks, recreation, and services. Today, Gastonia's neighborhoods largely comprise post-World War II single-family residential

suburban developments, with few connections to the city's historic core and a predominant focus on subdivision and planned communities.¹

PRO Housing Grant - Census Tract 328.01 Gaston County, NC



MAP 1: Census Tract 328.01, Gaston County, NC – Current Real Estate Transaction Types (Map: City of Gastonia Planning Department)²

¹ City of Gastonia. “*Gastonia 2025 Comprehensive Plan*”. May 2011.

<https://gastonienc.gov/images/files/planning/documents/2025/Complete-2025-Comp-Plan-20140930.pdf>

² Available Rental Units, Available Homes for Sale and Homes sold, Gastonia, NC 28054,

<https://www.realtor.com/realestateandhomes-search/28054/show-recently-sold>,

<https://www.realtor.com/realestateandhomes-search/28054>, and <https://www.realtor.com/apartments/28054>,

October 20, 2023.

Comparison to Priority Communities

Although Gastonia didn't meet the priority criteria, there are several census tracts within Gastonia that align with the preset criteria, akin to the cities classified as priority areas. This alignment is evident in data from the Grant website, specifically in metrics like the Housing Affordability Factor and the population figures for the approved regions.

Affordability Factors

One of the areas under consideration is Census Tract 328.01, which exhibits an affordability factor of 0.96, closely resembling that of Stanley and Lowell, as indicated in Table 1 below. The data in Table 1 clearly indicates that Census Tract 328.01 meets the qualification criteria of a Priority Community due to the striking similarities of the qualifying characteristics. This data is notably evident when compared to data for the City of Lowell and the Town of Stanley, both deemed Priority Communities.

When assessing the housing affordability factor, Census Tract 328.01 factor of 0.955951 closely resembles the factor for Town of Stanley of 1.013477. This information suggests that housing affordability in Census Tract 328.01 is on par with that of the priority communities.

Population

The population in Census Tract 328.01 is 2,558 and is relatively close to that of the City of Lowell at 3,780 and the Town of Stanley at 4,040. This data demonstrates a substantial community need in Census Tract 328.01 whereby low-income residents would greatly benefit from the grant.

Income, Rent, and Poverty Level

Income plays a pivotal role in housing options. The median income in Census Tract 328.01 stands at \$41,453, aligning closely with the median income figures observed in the City of Lowell and Town of Stanley

. This alignment underscores a shared economic landscape among these localities. Notably, Census Tract 328.01, despite sharing similar housing needs and rental demands, maintains a comparatively lower income threshold.

Moreover, rents in Census Tract 328.01, range from \$1,095 to \$2,120, with an average rent of \$1,608. The rents for this census tract are notably in line with the rental rates of Lowell and Stanley. Lowell's average rent is \$1,725, and Stanley's is \$1,900, making Census Tract 328.01 an attractive prospect for grant eligibility. Additionally, the poverty rates in Census Tract 328.01 are comparable to those in the priority areas, further supporting their case for grant eligibility.

In summary, when closely examining the community characteristics of housing affordability, population, rental rates, median income, and poverty levels for Census Tract 328.01 (Marietta and Osceola) in comparison to the Priority Communities within Gaston County, more specifically Lowell and Stanley, there are remarkable similarities. The data similarity makes a compelling argument for Census Tract 328.01 to meet eligibility for this grant opportunity.

City/Town	PRIORITY AREA	HOUSING AFFORDABILITY FACTOR	2022 POPULATION	AREA (SQ. MILE)	RENTAL RANGE		AVERAGE RENT	HUD RENTS (\$ BR)	TOTAL HOUSING UNITS	OWNER OCCUPIED UNITS	RENTAL UNITS	MEDIAN INCOME	POVERTY	Vacancy Rate
Lowell	Yes	1.022222	3,780	2.63	\$1,250	\$2,200	\$1,725	\$1,030	1603	1090	513	\$ 44,375	25.5%	4.0%
Stanley	Yes	1.013477	4,040	2.71	\$1,450	\$2,350	\$1,900	\$1,050	1598	1087	511	\$ 56,847	3.8%	8.0%
Modena/Osceola (Census Tract 328.01)	No	0.955951	2,558	0.90	\$1,095	\$2,120	\$1,608	\$1,220	1186	438.82	747.18	\$ 41,453	19.8%	6.0%

Table 2: Comparison of Census Tract 328.01 to Priority Communities in Gaston County³

Current Efforts

Outlined below are efforts to address and remove barriers to affordable housing production and preservation in Gastonia, NC:

Timeframe: Over the past five years, we have actively pursued efforts to address and remove barriers to affordable housing production and preservation.

Collaborative Policy Initiatives: The Housing and Community Engagement Department worked in close collaboration with different departments within the city, community organizations such as Habitat for Humanity, and housing advocates to identify and address the most pressing barriers to affordable housing. A key outcome of this collaboration has been the development and implementation of a comprehensive Affordable Housing Strategy.

- **Measurable Impact:** The Affordable Housing Strategy has successfully streamlined and expedited regulatory processes for affordable housing projects, reducing the time it takes to gain approvals and permits by 25%. This has significantly reduced development costs, making it more attractive for developers to invest in affordable housing projects.

Land Use and Zoning Revisions: Gastonia recently revised zoning ordinances to remove restrictions and promote the opportunity for mixed-income, high density housing development throughout the city. This approach has been particularly targeted at high-opportunity areas, which were previously underutilized due to various zoning constraints.

- **Measurable Impact:** As a result of the zoning revision, there was a 20% increase in the construction of affordable housing units in high-opportunity areas over the past three (3) years. This action created a more inclusive housing landscape throughout the city, ensuring that low- and moderate-income populations have greater access to previously unattainable housing options.

Investment in Underserved Communities: Significant resources were allocated to improve infrastructure and community services in historically underserved neighborhoods. This investment extends beyond housing and includes upgrades to parks, public transportation systems, sidewalks, and crosswalks.

³ Gaston County Community Profiles (township) , <https://censusreport.org/profiles>, October 2023.

- **Measurable Impact:** The investment in underserved communities has not only revitalized these areas but also attracted private developers to invest in affordable housing projects. Homes were developed to jumpstart revitalization of the Highland Community in partnership with developers and a non-profit CHDO organization. As a direct result, there was a two-percent (2%) increase in affordable housing stock in this underserved community, creating long-term opportunities for low-income residents, which is a considerable improvement for the area.

Preservation Initiatives: Preservation initiatives were launched to ensure the long-term affordability of existing housing units. These initiatives include rehabilitation for property owners to maintain safe, energy-efficient, and affordable homes and the establishment of the Gastonia Electric Assistance Resource (GEAR) Program to assist extremely low-income residents with their utility expenses.⁴

- **Measurable Impact:** Preservation efforts have successfully retained the affordability of over twenty-five (25) housing units in the city. Additionally, the City of Gastonia partnered with developers to enable the acquisition of properties that would have otherwise been converted into market-rate housing, preserving affordability in high-demand areas.

Access to High-Opportunity Areas: To increase access to affordable housing in high-opportunity areas, the down payment and closing cost assistance amounts were increased from \$5,000 to \$7,500. Furthermore, there are additional opportunities to partner with lenders in the area that offer additional funding of \$10,000 to \$20,000. Additionally, North Carolina Housing Finance Agency (NCHFA) may also provide funds to further increase affordability opportunities.

- **Measurable Impact:** The introduction of housing incentives resulted in increased opportunities for low- and moderate-income households to reside in high-opportunity areas. This has not only provided additional housing options but also enhanced residents' access to employment and education opportunities.

Affordable Housing Fund: Gastonia appropriates its resources to provide new construction and direct homeownership opportunities to provide sustainable funding for affordable housing initiatives, ensuring the continuity of affordable housing projects over the long term.

- **Measurable Impact:** Over the last five years Gastonia has allocated and expended more than \$1 million in funding for affordable housing projects, contributing to the creation and preservation of hundreds of affordable housing units in the city through renovations and rehabilitations.

Programs (2019 – 2023)	Investment Amount
Housing Rehabilitation Projects	\$524,407
Gastonia Electric Assistance Resource (GEAR) Program	\$ 34,590
Down Payment Assistance Program	\$620,636.60

Table 3: City of Gastonia Program Funds (2019-2023)

⁴ City of Gastonia. Gastonia Electric Assistance Resource Program, July 2023. <https://gastonianc.gov/i-want-to/apply-for/electric-bill-assistance.html>

Our efforts to identify, address, and remove barriers to affordable housing have resulted in measurable progress. By collaborating with various stakeholders and implementing innovative policies and initiatives, we have significantly increased the availability of affordable housing for low- and moderate-income populations, promoted housing preservation, and enhanced access to housing in high-opportunity areas. These initiatives are permanent fixtures in our community planning and have created a more equitable and inclusive housing landscape in Gastonia, NC.

EXHIBIT B: THRESHOLD REQUIREMENTS

City of Gastonia

The City of Gastonia requests \$4 million dollars to initiate and complete activities to address housing and community needs within Census Tract 328.01. Although Census Tract 328.01 is not designated as a Neighborhood Revitalization Strategy Area (NRSA), there is still an acute need within this community. Staff plans to obligate all funds as required by **September 30, 2026**. All project activity is anticipated to be completed within five (5) years of the grant agreement execution.

If a reduced amount below the \$4-million-dollar request is received, Gastonia will adapt its plan to a more specified area within the census tract that has the greatest need based upon a rating scale factor and will reduce the project amounts by percentage based upon the amount awarded.

Leverage

The City of Gastonia will leverage its current project staff salaries paid from both the City's General Fund and federal funds as outlined in the accompanying budget form. Staffing hours are estimates of staff time based upon similar prior projects and incorporates additional days for any unanticipated delays. Additionally, \$200,000 of Community Development Block Grant (CDBG) funds will be allocated for park improvements.

The projected amount of staff salaries and benefits to be leveraged is \$ \$1,495,129. The budget presented encapsulates the full term of the of the grant period (5 ½ years), but the City of Gastonia projects to have the proposed projects related to this grant completed in 5 years. Commitment of staff salaries and benefits are contingent upon receipt and annually allocated amount of federal funds.

Civil Rights and Fair Housing Experience

The City of Gastonia staff has in-depth knowledge and experience with both fair housing and civil rights. Our Diversity, Equity, and Inclusion (DEI) Coordinator manages the Title VI requirements for all city departments, and organizes and presents trainings to staff to include various fair housing. In addition, the DEI Coordinator provides annual reports and presentations to management, the Mayor and Gastonia City Council concerning DEI Program progression, to include staff and community demographics and the outcomes for the DEI Program. Federal programs as administered by staff requires knowledge of fair housing. All staff receive regular training on fair housing components and understand the requirements necessary for compliance. Gastonia's legal department works to advise, mitigate, and resolve any fair housing or civil rights complaints.

Applicant Threshold Requirements

The PRO Housing Notice of Funding Opportunity (NOFO) included threshold requirements that each applicant must meet and adhere to. The City of Gastonia developed a checklist of the threshold requirements as noted below:

Resolution of Civil Rights Matters

The City of Gastonia confirms, that it does not have any unresolved charges, cause determinations, lawsuits or letter of findings for matters referenced in section III.D.1 of the NOFO.

Timely Submission of Applications

The PRO Housing application, originally due 10/30/23, at 11:59:59 PM, will be submitted at or prior to the revised submission deadline of Monday, November 6, 2023, at 11:59:59 PM.

Eligible Applicant

The City of Gastonia is a North Carolina municipal corporation and qualifies as an eligible applicant.

Number of Applications

The City of Gastonia certifies its intent to submit one (1) application for the Pathways to Removing Obstacles to Housing (PRO Housing NOFO) FR-6700-N-98.

Statutory and Regulatory Requirements Affecting Eligibility

Gastonia meets the listed requirements for this section

Program Specific Requirements

Activities outlined meeting National Objectives and are Eligible Activities

Other Submission Requirements: Required Submission Documents

As part of the application for this NOFO, the City of Gastonia will submit the following required documents or confirm its compliance with the requirements of this NOFO:

1. Standard Form 424 (SF-424)	
2. Federal Assurances (HUD 424-B)	
3. Applicant Disclosure Report Form (2880)	
4. Certificate Regarding Lobbying	
5. Disclosure of Lobbying Activities (SF-LLL)	
6. EXHIBIT A: Executive Summary	
7. EXHIBIT B: Threshold Requirements	
8. EXHIBIT C: Need	
9. EXHIBIT D: Soundness of Approach	
10. EXHIBIT E: Capacity	
11. EXHIBIT F: Leverage Commitment	
12. EXHIBIT G: Long-Term Effect	
13. EXHIBIT H: Letters of Support/Partners	
14. Appendix A: Public Comment(s)	
15. Appendix B: Certification	
16. Appendix C; Code of Conduct	
17. Federal Assurances Representations and Certifications	<i>Completed as part of the Sam.gov registration.</i>
18. 424-CBW	
19. Limited English Proficiency	Gastonia has a Title VI Plan that addresses Limited English Proficiency
20. Physical Accessibility	Gastonia will comply with this criteria

21. Environmental Review

Gastonia, if awarded funding will comply with this criteria

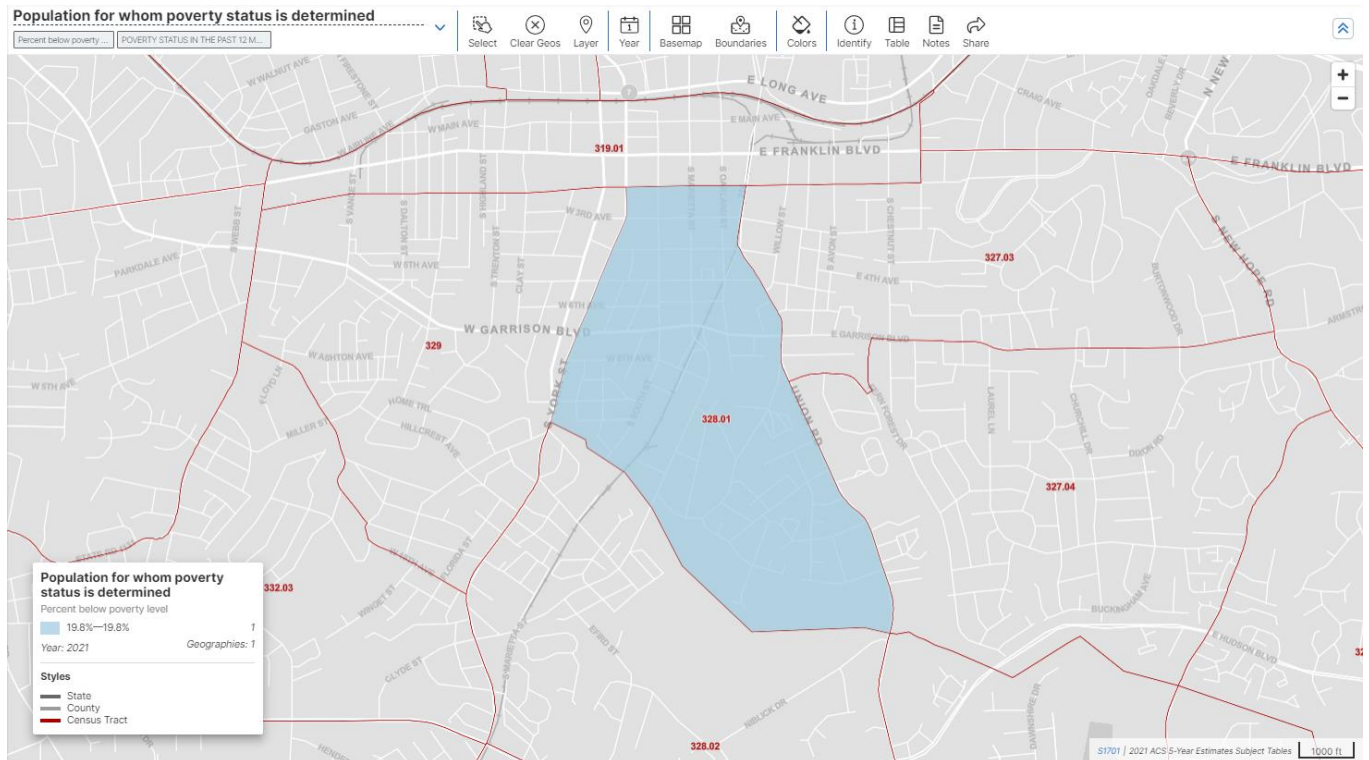
EXHIBIT C: NEED

City of Gastonia

Acute Demand

Gastonia, more specifically Census Tract 328.01, faces an acute demand for affordable housing. While data-driven evidence supports this claim, it is essential to highlight the unique challenges and obstacles that this community faces.

The map below shows a poverty level of 19.8%, of households within the subject area, taking into account the ratio of renters to homeowners. This is comparable to the towns/cities such as The Town of Stanley is deemed as a Priority Community as defined by the requirements of this grant.⁵



Map 4: Census Tract 328.01 – Proposed subject area – poverty status ⁶

Measures Supporting Acute Demand

Affordable Housing Not Keeping Pace: Gastonia has experienced rapid population growth over the past five (5) years, with a 15% increase from 2019 to 2023. During the same period, the number of affordable units and available to households at 80% of the HUD Area Median Family Income (HAMFI) has only increased by 5%. This indicates that our affordable housing stock has not kept pace with our population growth.⁷

Insufficient Supply of Affordable Housing: The number of households at 80% of HAMFI has steadily risen, surpassing the number of available units for households at the same income level.

⁵ U.S. Department of Housing and Urban Development. PRO Housing Priority Geography. <https://hudgis-hud.opendata.arcgis.com/apps/749ddfcac01c41619f98f7c99303947e/explore>

⁶ United States Census Bureau. American Community Survey 10 10 2023. <https://data.census.gov/>

⁷ <https://www.huduser.gov/portal/datasets/il.html>

For instance; in the area of focus on Osceola and Marietta Streets. There are two (2) renters for every one (1) homeowner with less than 130 available units out of 2,600 units. This insufficiency has resulted in increased competition for affordable housing, making it challenging for low and moderate-income families to secure suitable housing.

Widespread Housing Cost Burden: A significant portion of households with incomes at or below 100% of HAMFI experience housing problems. Cost burden is a prevailing issue, with a substantial number of households paying more than 50% of their income on housing. This cost burden significantly limits the financial stability and well-being of these households.

Compelling Local Information:

Beyond these measures, Gastonia faces additional factors indicating acute demand for affordable housing:

Displacement Pressures: The city has been experiencing significant displacement pressures due to gentrification in certain neighborhoods. As the demand for housing in revitalized areas increases, lower-income residents are pushed out of their communities, exacerbating the affordable housing crisis.

Housing Stock Condition: A considerable portion of the housing stock in Gastonia is aging and in need of repairs or renovations which results in substandard housing conditions, contributing to health and safety concerns for residents.

Income Disparities: The ratio of median home prices as compared to the area median income is disproportionate, making homeownership an unattainable dream for many low and moderate-income families. This creates a rental-heavy market that further strains the supply of affordable housing.

Homelessness: Gastonia has seen a rise in homelessness, with limited shelter space and affordable housing options available for those experiencing housing instability.

Workforce Housing Shortage: Gastonia's economy has been growing, but many of the available jobs do not pay wages sufficient to support housing at market rates. This creates a heightened need for workforce housing options.

In summary, the acute demand for affordable housing in Gastonia, North Carolina, is not only supported by the provided measures but is also evident in the unique challenges and local factors we face. The increasing cost burden, displacement pressures, aging housing stock, income disparities, homelessness, and workforce housing shortage all contribute to the pressing need for affordable housing options for households with incomes below 100% of the area median income in our community.

Key Barriers

Key affordable housing barriers identified within Gastonia as part of prior and current studies identified the following barriers:

Availability of Financing and Subsidies: The foremost barrier to affordable housing production and preservation in Gastonia is the limited availability of financing and subsidies. While there is a growing demand for affordable housing, securing the necessary funding to develop and maintain these properties remains a substantial challenge. Federal, state, and local resources have not kept pace with the demand for affordable housing. This has resulted in a lack of incentives for developers to invest in low-income housing projects, hindering the growth of affordable units. This is a key barrier because without adequate financing and subsidies, it is impossible to create and maintain affordable housing options.

Capacity of Local Affordable Housing Developers and Managers: The capacity of local developers and property managers specializing in affordable housing is another significant barrier. Many developers lack experience in low-income housing development, which can lead to inefficiencies and delays in project execution. The absence of specialized training and expertise in managing affordable properties also affects the long-term viability of these units. This barrier is key because it limits the ability to efficiently develop and manage affordable housing projects and maintain their quality over time

Procedural Delays and Community Engagement: Procedural delays associated with community engagement and review processes contribute to slow affordable housing production. Gastonia's regulatory procedures and community review can be time-consuming and sometimes result in extended project timelines. The extensive review processes can be a significant barrier because they deter developers and investors from engaging in affordable housing initiatives. Streamlining these processes is crucial to accelerate the development and preservation of affordable housing units.

Opposition to New and Affordable Housing: Community opposition to the construction of new affordable housing is a key barrier to production and preservation. There is a misconception that affordable housing may negatively impact property values or increase crime rates, which can lead to resistance from residents. Overcoming this barrier requires addressing these misconceptions through community education and awareness programs.

Unique Challenges for Low and Very Low-Income Households: In Gastonia, very low and low-income households face unique barriers, such as limited access to employment opportunities, affordable healthcare, and public transportation. These challenges can prevent residents from escaping the cycle of poverty, making it essential to integrate comprehensive support services, employment opportunities, and healthcare access with affordable housing initiatives to address the root causes of housing instability. Even though the focus is on the demographic above, we are also acknowledging the need for affordable housing in the moderate-income category for the census tract in question.

Lack of Land and Infrastructure: The availability of suitable land and infrastructure is a challenge for affordable housing development. Limited vacant land in desirable locations and the need for necessary utilities and infrastructure upgrades increase development costs and can lead to reduced affordability.

Addressing these key barriers is essential to creating a sustainable and effective affordable housing program in Gastonia, NC. By developing strategies to increase financing options, build the capacity of local stakeholders, streamline regulatory processes, and educate the community about the benefits of affordable housing, we can overcome these challenges and make meaningful progress in addressing the affordable housing crisis in our jurisdiction.

Income and Affordability

Current incomes within Gaston County and more specifically Gastonia are not keeping pace with the housing market. The North Carolina Low Income Housing Coalition's 2023 Housing Need in Gaston County noted that the average fair market rent is \$1,333 per month. The average wage needed to afford this payment is \$25.63 per hour or an annual income of \$53,320. Residents earning an average salary range of \$23,490 - \$29,850 have a substantial cost burden when considering these households must factor and shoulder costs for childcare and healthcare as compared to other Gaston County households with higher incomes.

Eviction

Gaston County ranks 12th in the state for the number of evictions among renter households. Cost burden data shows that affordability needs are particularly severe for renters with incomes under 30% of HUD Area Median Family Income (HAMFI). Input collected from stakeholders and public meeting attendees strongly suggests that a scarcity of quality affordable rental units combined with low incomes makes housing increasingly unaffordable to Gastonia residents.⁸

Education levels in the area pose another barrier to affordable housing. Limited education of low-to moderate-income residents reduces the ability to obtain access to obtain higher technical skilled careers with higher pay levels.

Unequal Access to Housing

Due to the limited housing supply, housing opportunities are at a greater percentage for those of higher incomes in comparison to those of lower income means. Minorities continue to experience housing inequalities in both rental and purchase transactions at a greater rate than non-minorities.

When viewing purchase transactions for real estate, minorities tend to take on a greater level of debt to obtain housing with similar characteristics as their counterparts. Low housing equity is created due to smaller down payments and modest median home values which further translates to less overall wealth for both black and Hispanic households. These minority households tend to rely more heavily on their homes to accumulate wealth.

In terms of rental transactions, a growing segment of the population have become renters. With the sharp pricing increase of rental housing, availability is scarce and competition for limited units is more intense. Those with limited incomes are less likely to meet income requirements, deposits, and fees.

Additional factors that result in unequal access to housing include:

⁸ North Carolina Low Income Housing Coalition "2023 Housing Needs in Gaston County", <https://nchousing.org/wp-content/uploads/2017/01/NCH-CountyProfile-Gaston.pdf>

Transportation

Transportation is also a factor that impacts housing choice. Areas with limited access to public transportation cannot be accessed or considered by those persons with limited transportation means thus reducing their opportunity for greater housing choice.

Corporate Investment in Residential Real Estate

Since 2020, there has been an increased investment of corporate acquisition of residential properties. Corporate entities, with considerable amounts of capital and other substantial resources at their disposal, have been aggressively purchasing residential properties in our area. This trend has created several significant barriers to affordable housing, which can be outlined as follows:

- **Escalating Property Prices:** The influx of corporate investment in residential real estate has driven up property prices, making it increasingly difficult for low and middle-income individuals and families to enter the housing market. As demand rises due to corporate investment, so does the cost of housing, leaving many prospective homebuyers and renters struggling to afford suitable accommodations.
- **Rental Market Squeeze:** Corporate acquisition of residential properties has led to the conversion of many homes into rental units managed by large corporations. This shift has resulted in a shrinking supply of rental housing available to the average consumer. As a result, the rental market has become more competitive, and rents have risen, creating a significant burden for those seeking affordable housing options.
- **Reduced Housing Stock for Affordable Housing Initiatives:** The corporate investment in residential real estate has, in many cases, removed properties that could otherwise be available for affordable housing initiatives. These properties have often been bought by corporations to turn a profit, limiting their availability for community-driven efforts to provide affordable housing options.

Gentrification

Aging neighborhoods experiencing the stresses of poverty and the loss of affordable housing units face the risk of both gentrification and displacement. One such example is a neighborhood with an aging population and limited income that can no longer afford to maintain the property and pay increasing tax rates.

Eviction and Displacement

Rising housing costs create a cost burden on the lowest-income and some moderate-income households which face the greatest risk of eviction and/or displacement.⁹

⁹ Idzikowski, Sydney and Dreier, Andrea. “A Snapshot of Evictions in North Carolina”. May 2018. <https://www.ncjustice.org/publications/a-snapshot-of-evictions-in-north-carolina/>

To address this issue and ensure equal access to housing for all community members, our grant proposal aims to implement strategies that mitigate the impact of corporate investment in residential real estate on the affordability and availability of housing. By doing so, we can help restore balance to our housing market, fostering a more inclusive and equitable community. Our proposed initiatives include:

- **Incentives for Affordable Housing Development:** Establishing and reinforcing incentives, such as tax breaks or grants, to encourage corporations to allocate a portion of their residential properties to affordable housing initiatives.
- **Public-Private Partnerships:** Collaborating with local corporations to invest in affordable housing initiatives, thereby redirecting some of the corporate resources towards community-focused housing solutions.

These measures will not only help mitigate the adverse effects of corporate investment in residential real estate but also ensure that all members of our community have equal access to safe, affordable, and stable housing.

Limited Housing Stock/Availability

Gastonia's Comprehensive Plan noted several trends concerning policies that focus on preserving the city's existing affordable housing stock and developing diverse new affordable housing options. The plan indicated that Gastonia will continue to experience a loss of affordable housing inventory. Several factors were cited including rising housing costs outpacing household incomes, a high percentage of cost-burdened households in the city, and a need for development of city policies that support the development of a more diverse and affordable housing stock.

Concerns were noted about rising housing costs within Downtown Gastonia and its loss of unsubsidized affordable housing around the Franklin Urban Sports Entertainment (FUSE) district development. Community input noted that rising property values as the district redevelops are likely to impact homeowners who may have difficulty affording property tax increases and renters who may face increased rents, due both to rising market rents and to landlord efforts to recoup property tax increases. The current housing market conditions and the influx of new residents puts an even greater strain on the already limited housing stock availability leaving individuals and families in search of affordable housing with further reducing housing choice.

As of 2022, the City of Gastonia worked to address these factors by implementing and updating housing assistance policies to provide greater assistance levels to low- and moderate- income families and also incentivized multi-family housing development that incorporates housing units for extremely low-income households within the development.¹⁰

Zoning ordinances have been reviewed and several ordinance updates were made to reduce barriers to affordable housing. Furthermore, the City is currently conducting an affordable housing study

¹⁰ City of Gastonia. City Council Agenda for December 6, 2023, Item I: Committee Reports, 2J https://granicus_production_attachments.s3.amazonaws.com/cityofgastonia/b4adf890d1aa9b6a4b36077948cd01d40.pdf

to better understand Gastonia’s affordable housing challenges and offer recommendations on how best to address the housing issue. ¹¹

EXHIBIT D: SOUNDNESS OF APPROACH (35 Points)

City of Gastonia

¹¹ City of Gastonia. Uniform Development Ordinance
https://library.municode.com/nc/gastonia/codes/unified_development_ordinance

Vision

This proposal focuses efforts toward a geographic location where several improvements and projects are currently underway or will take place in the foreseeable future. The City identified several needs for this area and efforts are being made to enhance the quality of life for citizens through additions of amenities, infrastructure improvements, as well as efforts to enhance safety in the community.

Two primary goals for utilizing the funds from this grant include acquiring vacant properties to construct affordable housing, as well as increasing sustainability on the current housing stock through rehabilitation programs for eligible homeowners. If some vacant properties cannot be reclassified from commercial to residential, it is our intent to utilize these properties to promote access for women and minority business owners at these locations.

In order to create sustainability, both through the enhancement of new construction or rehabilitated homes in this community, enhancements to the infrastructure and amenities throughout this community of Gastonia are also needed. As this selected area's population falls within the overall low- to moderate- income area, improvements to this community would be eligible and well needed.

The City of Gastonia is in the process of up-fitting a plot of land and turning it into a public access park, with ballfields, playground, and shelter. This land was previously used as athletic fields by the Salvation Army Boys and Girls Club and purchased by the City of Gastonia in 2022. This amenity will provide opportunities for local residents to have greater access to athletic programs and community building opportunities. Our proposal will utilize some of the funding to go toward additional improvements to the park to increase access for community members to this facility.

The City also developed a plan to enhance the street lighting throughout this geographic location. There are still 126 low-pressure sodium streetlights that need to be converted to LED. This LED conversion is estimated to cost slightly more than \$26,000, and the improvements from the conversion will increase sight visibility which can lead toward a safer environment during the evening hours.

The City also has plans for multiple sidewalk additions/improvements, adding bicycle lanes to thoroughfares, and road widening to allow for multiuse paths. The improvements will enhance the walkability and accessibility to resources, amenities and services for the citizens in this area. One specific project includes the widening of Union Road (U-5961 – NC 274) from Osceola Street to Niblick Drive and includes a multiuse path on one side and a sidewalk on the other. The estimated cost for this project, which is located in Census Tract 328.01, is currently \$11.4M, utilizing both federal and local funds. There are additional projects being developed and planned out investing nearly \$4M additional dollars in this community in the coming years. Although the costs referenced are forecasts, funds have not yet been allocated for these projects.

Additionally, at its current state, the City of Gastonia's transit line does not have a bus stop or route established that intersects with the area in which this grant is proposing to enhance. The City of Gastonia has future plans of incorporating a micro-transit system which will benefit all areas of Gastonia, as it will provide greater opportunity for direct connections to locations requested by

citizens. This addition will directly benefit the citizens in Census Tract 328.01 as it will provide greater accessibility to transportation for jobs, necessary appointments, access to food options, and more.

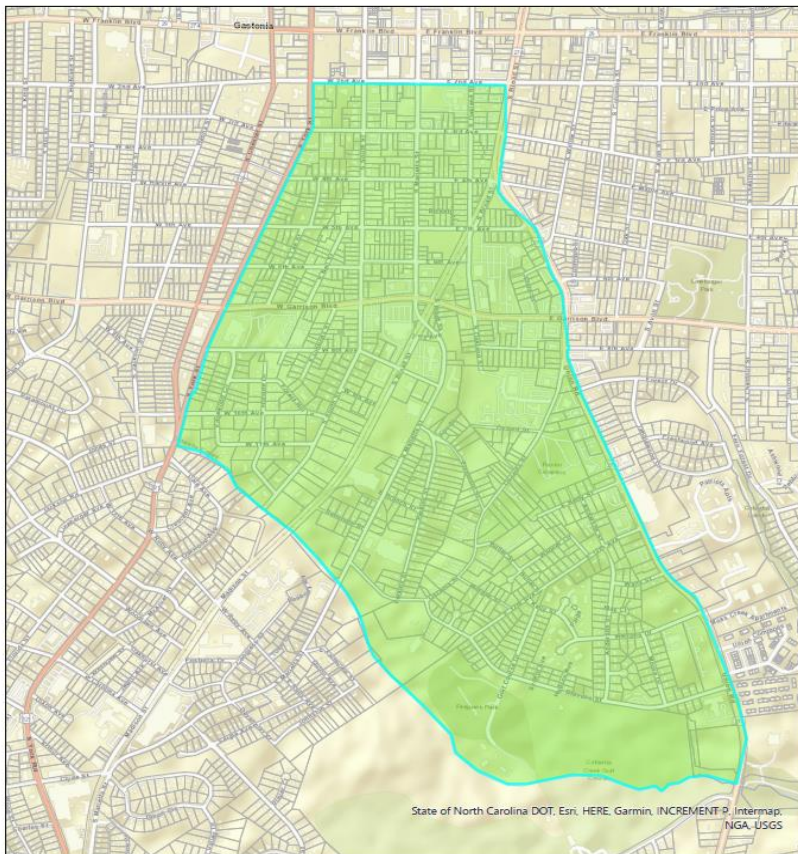
These anticipated and current initiatives will provide an even greater benefit to the community in which our proposal aims to enhance.

As a large portion of our proposal reflects the enhancements of a new park in this community, a good working relationship with the City’s Parks and Recreation Department is essential. In the past, the Housing and Community Engagement Department has worked closely with the Parks and Recreation on projects utilizing grant funding. Through this experience of working together, we have established a workflow and meeting structure which allows for proper timeliness of project execution, capturing necessary documentation of project progress, and essential flows of communication for best effectiveness on projects.

Geographic Scope

The specified focus area is located within the corporate limits of Gastonia, within Census Tract 328.01. Boundaries for the area are noted as follows:

- W. Garrison Blvd between S. York Street and Union Rd
- S. York Street down to E. Hudson Blvd
- E. Hudson Blvd to Union Rd.



Map 5: Census Tract Map 328.01 Gaston County, Geographic Scope

Our strategic combination of land acquisition, sidewalk improvements, enhanced lighting, and the addition of a community park will play a pivotal role in the preservation and creation of housing units within the targeted location. Land acquisition will target underutilized land to create opportunities for new affordable housing development. Lighting and sidewalk improvements make neighborhoods safer, preserve the sense of security, and encourage current residents to stay while additionally attracting developers, investors, and businesses which contribute to the creation of new housing units to meet the growing demand. Lastly, the addition of a community park not only preserves the quality of life for existing residents but also acts as a catalyst for neighborhood revitalization, spurring economic growth and, in turn, housing construction. In this way, these initiatives foster a sense of community, safety, and economic vibrancy, while simultaneously preserving and creating housing units to benefit the entire neighborhood.

Key Stakeholders

Key Stakeholders have been identified from prior partnerships and their ability to bring the required skills to carry out activities. The City of Gastonia has established relationships with non-profit development organizations that address new construction and housing rehabilitation, non-profit outreach organizations, for-profit developers, in-house city staff with engineering, utilities and facility operation experience, lenders, real estate agents, and a vast array of organizations that through partnership, have the necessary skillset and resources to carry out the outlined activities.

Align with Affirmatively Further Fair Housing Requirements

Gastonia's Alignment with Fair Housing Requirements:

Removing Barriers in Well-Resourced Areas: This proposal includes initiatives to remove barriers to the development of affordable housing in well-resourced areas of opportunity. We aim to increase access for underserved groups by offering incentives to developers to create affordable housing units in these areas. To ensure equitable access, grant activities target underserved communities of color, including African-American, Hispanic, and other minority households. By fostering diversity in well-resourced areas, our proposal aligns with the goal of affirmatively furthering fair housing.

Promoting Desegregation: Staff recognizes that segregation perpetuates disparities in housing opportunities. This proposal addresses policies and practices that perpetuate segregation by actively encouraging mixed-income housing developments in historically segregated neighborhoods. This action should encourage higher-income earners to purchase in low to moderate-income areas where they may not have otherwise. Through inclusive zoning revisions and educational programs such as the home buyer education class that includes a segment on fair housing, Gastonia aims to promote desegregation. The objective is to dismantle barriers that contribute to housing segregation and create more inclusive communities.

Preventing Concentration of Affordable Housing: Measures were taken to ensure this proposal does not lead to further concentration of affordable housing in low-opportunity areas. By providing incentives for the development of affordable housing in well-resourced areas, we

expand housing choices and the neighborhoods in which residents seeking affordable housing can live. This approach is in line with the objective of de-concentrating affordable housing.

Unique Housing Needs of Protected Class Groups: Our proposal prioritizes the unique housing needs of protected class groups. We include provisions for accessible housing for persons with disabilities and families with children, ensuring compliance with the Americans with Disabilities Act (ADA) and Fair Housing Act. We are dedicated to fostering independent living for individuals with disabilities by seamlessly integrating an array of supportive services and transportation options. The following are the specific components of our program:

1. **Supportive Services:** Our housing plan includes a range of supportive services tailored to the unique needs of individuals with disabilities. These services encompass:
 - a. **Accessibility Modifications:** We will provide accessibility modifications to ensure that living spaces are fully accommodating, with features like wheelchair ramps, wider doorways, and specialized bathroom fixtures.
2. **Transportation Options:** Recognizing the significance of accessible transportation, our housing plan incorporates the following transportation solutions:
 - a. **Shuttle Services:** A dedicated shuttle service will be provided, offering scheduled transportation to key locations such as medical facilities, grocery stores, and recreational areas. This service ensures that residents have reliable access to essential destinations.
 - b. **Public Transit Accessibility:** Selected housing locations will be strategically situated near public transit hubs, enhancing access to public transportation networks.

Fair Housing Plan Integration: Our proposal is aligned with our jurisdiction's most recent fair housing plan. We have reviewed and incorporated the goals and strategies outlined in the plan into our proposal, ensuring that our grant activities are consistent with our fair housing objectives.

Anti-Displacement Measures: We have considered the risk of displacement associated with our proposal and have implemented anti-displacement measures. These include the replacement of affordable units for new construction projects and the provision of right of first refusal for existing tenants, safeguarding vulnerable residents in communities of color.

Equity and Inclusivity: The City of Gastonia supports diversity, equity and inclusion of minority-, women-, and veteran-owned businesses during the housing production process. This process encompasses equity considerations specific to our local circumstances.

Broad Affirmative Marketing: If funded, we will engage in a broad affirmative marketing strategy to ensure that the benefits of our proposal are made widely available to all demographic groups, especially those that may be unlikely to apply without proactive efforts. We will advertise and promote housing opportunities in a manner that reaches diverse and underrepresented groups.

City of Gastonia’s Recent Accomplishments: In the most recent CAPER submitted to HUD in September 2023, several accomplishments were referenced toward Affirmatively Furthering Fair Housing efforts. Here is an excerpt from the City’s CAPER regarding these accomplishments:

“To better educate residents about fair housing and to increase the opportunity for greater housing choice, staff made efforts to actively provide education to schools concerning fair housing. Due to COVID, these methods have been temporarily suspended. In April 2023, as part of Fair Housing Month, the City of Gastonia organized an educational event with a special focus on school-aged children aged 5 to 15 participating in an after-school program. This initiative aimed to raise awareness and educate young minds about fair housing principles. Impressively, the event successfully reached and educated approximately 27 children, fostering a culture of fairness and inclusivity from a young age.”¹²

The City of Gastonia upholds its commitment to fair housing by maintaining a dedicated Fair Housing information phone line. This resource serves as a screening tool to assist individuals and families who suspect they may have encountered housing discrimination. Importantly, this line also extends its reach to address a spectrum of housing-related inquiries, providing valuable referrals to legal assistance, non-profit organizations, and other relevant resources. On average, call volume ranges from 15 to 17 calls per week with less than 1% of all callers experiencing actual fair housing violations.”

Our proposal not only meets the requirements to affirmatively further fair housing but actively seeks to address historic disparities, break down barriers, and promote inclusivity, accessibility, and equitable housing opportunities for all residents in our community.

Proposed Activities, Budget and Timeline

After thoroughly assessing the current barriers, community needs and potential partnerships, the following activities, budget and timeline are proposed for consideration:

Activity 1: Affordable Housing Development

(single and multi-family as available) and may include:

1. Financing the construction or rehabilitation of affordable housing
2. Acquisition or disposition of land or real property for the development of affordable housing
3. Providing large-scale technical assistance to affordable or non-profit developers, which leads to the development of affordable housing
4. Administrative costs to carry out the administration of Affordable Housing Development

Activity 1 Budget: \$2,250,000

Activity 1 Timeline: 01/31/2024 - 01/31/2029

Obligate all AHD funds by: 09/30/2026

¹² <https://cpd.hud.gov/cpd-public/consolidated-plans> or https://gastonianc.gov/images/files/housing_neighborhoods/CAPER_FY2022-23_POSTED_WORKING_DRAFT.pdf \$\$

Activity 2: Park Development /Other Infrastructure Improvements

1. Investing in neighborhood amenities that benefit low-and-moderate income residents such as parks, community centers, bike lanes and improvements to the physical environment that increase public safety such as streetlights or sidewalks.
2. Installing new utilities and/or infrastructure improvements necessary for the development or preservation of affordable housing
3. Administrative costs to carry out the administration of Park Development/Other Infrastructure Improvements

Activity 2 Budget: \$1,750,000
 Activity 2 Timeline: 01/31/2024 - 01/31/2029
 Obligate all infrastructure funds by: 09/30/2026

Proposed Budget			
1	Personnel (Direct Labor)	\$137,463.61	3%
2	Fringe Benefits	\$10,205.05	0%
3	Travel	\$0.00	0%
4	Equipment	\$0.00	0%
5	Supplies and Materials	\$0.00	0%
6	Consultants	\$41,250.00	1%
7	Contracts and Sub-Grantees	\$7,500.00	0%
8	Construction	\$380,3581.34	95%
9	Other Direct Costs	\$0.00	0%
10	Indirect Costs	\$0.00	0%

Table 6: Proposed Budget

Proposed Timeline	
Activity Description	Date/Period
Notice of Grant Award	December 2023
Receipt and Execution of Grant Agreement	January 2024
Consult with all participants and finalize plans to include marketing	February 2024 – June 2024
Hire Consultant and Initiate Environmental Assessment	February 2024 – June 2024
Preliminary Development of all Request for Proposals	June 2024 – August 2024
Initiate and Execute Written Agreements with Partners	July 2024
Initiate Community Marketing Plan	August 2024
Community Outreach	September - October 2024
Set up Activities, Collect Data and Review Details for Program Compliance	October – November 2024
Begin Program Activity	December 2024
Commit all program funding by deadline	September 30, 2026
Conduct Program Activity	November 2024 – November 2027
Prepare Activity Closeout, Compliance Review and Testing for All Activities	January 2028 – January 2029
Program Closeout and Final Reporting	February 2029 – September 2029

Table 7: Proposed Timeline

Potential Roadblocks

While we are steadfast in our commitment to achieving our project goals, several roadblocks may present challenges during the process. Land acquisition for affordable housing might face hurdles due to limited availability of suitable land, competing interests in the real estate market, or potential resistance from current landowners.

Similarly, promoting business development for minority and women business enterprises could encounter obstacles related to access to funding, market competition, and achieving inclusivity within a competitive business landscape.

Enhancing sidewalks and lighting may face delays due to permitting issues, budget constraints, or coordination challenges with existing infrastructure. Lastly, building a park may encounter challenges related to environmental regulations, community zoning concerns, or limited available space.

Despite these potential roadblocks, our determination and strategic approach will guide us in navigating and overcoming these obstacles to realize our project goals and positively impact the community.

EXHIBIT E: CAPACITY (10 Points)

City of Gastonia

Partnership Capacity

The City of Gastonia's capacity to effectively manage a federal grant of this size and scope is supported by a strong record in successful grant management. With a highly skilled team that has substantial experience in financial management, compliance, project execution, and community engagement, we are well-prepared to handle the complexities of this grant. Additionally, our demonstrated ability to collaborate with federal agencies, oversee sub-recipients, and manage large-scale infrastructure projects positions us as a dependable steward of grant funds. We are dedicated to ensuring transparent, efficient, and responsible grant management, maximizing the use of these resources to achieve our project's objectives while adhering to all relevant regulations.

Implementation of proposed activities

The City of Gastonia will manage and oversee the entire project. This will be done utilizing the Housing & Community Engagement Department with supporting roles coming from the Diversity, Equity and Inclusion, Economic Development, Development Services, Financial Services, Legal, Parks and Recreation, Planning, Public Utilities, and the Public Works Departments. Within the Housing and Community Engagement Department, the Neighborhood Program Division and Keep Gastonia Beautiful a quasi-government/non-profit organization will provide services to help inform residents, identify community concerns, build cohesive community groups and work with citizens to create various beautification efforts. The Housing and Community Engagement Department has utilized this same structure and approach of other city department inclusion with past projects.

Internal Control Capacity

The City of Gastonia is well-equipped with the necessary project management, quality assurance, financial and procurement, and internal control capacities to swiftly launch and implement major projects. Our robust policies, crafted in compliance with federal law, ensure efficiency, accountability, and adherence to regulatory standards. With a proven track record in managing large-scale initiatives, we are fully prepared to initiate and successfully execute significant projects that benefit our community.

Leadership Capacity and Legal Authority

To effectively implement the reforms, we've envisioned for our infrastructure, including initiatives like upgrading sidewalks, enhancing lighting, developing parks, and acquiring land for affordable housing and business expansion, we recognize the critical importance of leadership capacity and legal authority within our jurisdiction. As local government leaders, our city planning department, and the active engagement of our community leaders and neighborhood associations play pivotal roles in driving these projects forward.

Agency and Partner Credentials

This specific project will have the following team structure to ensure a successful completion.

Project Manager

- Danette Dye, Director of Housing & Community Engagement

Program Manager

- Kenny Gehrig, HUD Administrator for the City of Gastonia

Project Team Members

- Daphney Pierresaint, Case Management Specialist
- Nancy Welch, Case Management Specialist
- Eric Murphree, Construction Specialist II
- Tyler Davis, Neighborhood Program Administrator/Grant Administrator
- Lana DuPont, Grants Accounting Specialist

Collectively, this team is the driving force behind the successful completion of the project. At the helm, the Project Manager will administer comprehensive project planning, providing vital oversight and guidance throughout the project's lifecycle. Directly reporting to the Project Manager, the Program Manager ensures that all projects are contained within the designated project boundaries and meets its objectives.

Supporting these leadership roles, the Project Team Members carry out the project's intricate technical work, guaranteeing that each activity is executed with precision and adherence to required standards. These team members are also responsible for meticulous documentation, ensuring the project's progress is well-documented and readily available for evaluation and reporting. The Grant Administrator plays a critical role in managing the financial aspects of the agreement, meticulously tracking budgets and expenditures, and ensuring strict compliance with the stipulated terms and conditions. Throughout this project's journey, adherence to the City of Gastonia's Grants Policy remains a guiding principle, guaranteeing that all financial and procedural aspects align with established regulations and practices.

Habitat for Humanity of Gaston County, Inc., has extensive experience in housing counseling, construction and rehabilitation. The agency has been in existence since 1988, and has a long-standing partnership history with the City of Gastonia on various rehabilitation, housing counseling and new construction projects.

The Parks and Recreation (P&R) Department have park development, management and operation capacity. P&R staff have worked on various projects dealing directly with vendors and the procurement process, and have extensive experience in all skillsets referenced.

Keep Gastonia Beautiful is a non-profit organization with experience in community education and outreach. The organization has established a wide array of programming, and has a substantial and active volunteer base.

The Neighborhood Program, Alliance for Community Enrichment or ACE, has several years' capacity in outreach, development and coordination with communities within the City. The program is effective in providing staff resources to address community concerns. Other departments that are key and accessible for this project include departments as listed previously in this application.

Coordination and Partnership Efforts

Understanding that public-private partnerships, in collaboration with local nonprofits and advocacy groups, can significantly bolster our efforts. On the legal front, we're well-aware that our jurisdiction's authority is derived from zoning and land use regulations, the responsible exercise

of eminent domain when necessary, adherence to environmental regulations, and the ability to secure funding through bonds or grants. Furthermore, we are committed to strict compliance with fair housing and anti-discrimination laws as we advance our affordable housing initiatives. Ultimately, our success in these reforms hinges on our cohesive efforts, combining effective leadership with a clear understanding of our legal authority, all while adhering to existing regulations and standards.

Grant Writing Participants

The team preparing this application for the City of Gastonia, specifically the Housing & Community Engagement Department include:

- Danette Dye, Director of Housing & Community Engagement
- Kenny Gehrig, HUD Administrator
- Tyler Davis, Neighborhood Program Administrator/Grant Administrator
- Lana DuPont, Grants Accounting Specialty
- Nancy Welch, Case Management Specialist
- Daphney Pierresaint, Case Management Specialist

Experience with Civil Rights and Fair Housing Issues

The City of Gastonia conducts an Analysis of Impediments Study every five years. The most recent study was completed in 2019, and in September 2023, the City of Gastonia began its next study. Each study provides recommendations to address fair housing issues and economic disparities. One example is around lending disparities.

The City of Gastonia has staff with in-depth knowledge and experience concerning both fair housing and civil rights. Our Diversity, Equity, and Inclusion (DEI) Coordinator manages Title VI requirements for all city departments, as well as organizes and presents internal staff trainings to include fair housing. In addition, the DEI Coordinator provides annual reports and presentations to management, the Mayor and Gastonia City Council concerning DEI Program progression, inclusive of staff and community demographics and the outcomes for the DEI Program.

Federal programs as administered by staff requires knowledge of civil rights and fair housing. All staff receive regular training on fair housing components and understand the requirements necessary for compliance. Gastonia has a legal department that works to advise, mitigate, and resolve complaints.

EXHIBIT F: LEVERAGE COMMITMENT (10 Points)

City of Gastonia

Staffing Resources/Salaries

The City of Gastonia will leverage its current project staff paid from both the City's General Fund and federal funds (Community Development Block Grant and Home Investment Partnerships Program) as outlined in the accompanying budget form. Staffing hours are estimates of staff time based upon similar prior projects and incorporates additional days for any unanticipated delays.

The City of Gastonia will utilize its staffing resources as available in the follow capacity:

1. Staff labor where available to add features and amenities to the park to reduce the overall costs; and
2. Staff labor to provide education and resources to citizens in need of programming services to obtain education and training needed to acquire and sustain housing;

When considering staffing through the full grant period of January 2024 through September 2029, the projected amount of staff salaries and benefits to be leveraged is \$ \$1,495,129. The budget presented encapsulates the full term of the of the grant period (5 ½ years), but the City of Gastonia projects to have the proposed projects related to this grant completed in 5 years. Commitment of staff salaries and benefits are contingent upon receipt and annually allocated amount of federal funds.

Community Development Block Grant (CDBG) Program funds

The City of Gastonia is committed to addressing affordable housing and community-related issues. Within the specified subject area, the nearest park is approximately four (4) miles away and requires crossing a busy thoroughfare. In order to provide a community resource that will benefit the subject area, the City of Gastonia, in 2002, acquired a vacated facility on South Marietta Street that was a previously center for a non-profit organization. The site has not been utilized for a number of years.

Currently, the City of Gastonia plans to spend approximately \$200,000 of its Community Development Block Grant (CDBG) funds to construct two (2) park shelters and install playground equipment at the recently acquired park facility. Pending the submission of the Request for Release of Funds anticipated on Monday, November 13, 2023 and HUD approval anticipated by December 20, 2023, the funds are committed to the project. As available, general fund dollars will be used to add additional amenities.

HOME Investment Partnerships Program funds

As a grantee, the City of Gastonia, may use funds to assist with pre-development costs, construction and assistance to homebuyers as funds as provided through the HOME Investment Partnerships Program are available. The amount of funds available are subject to allocation award per program year and other criteria.

Forecasted Leveraging for Grant Period

Considering staff salaries and CDBG funds committed to projects, City of Gastonia leveraging of funds to the PRO Housing NOFO is estimated at 50.29%.

EXHIBIT G: LONG-TERM EFFECT (10 Points)

City of Gastonia

Long-Term Effects and Outcomes

This proposal strategically combines land acquisition for affordable housing and business development, along with improving sidewalks, lighting, and adding a community park. The approach effectively addresses critical barriers to both producing and preserving affordable housing and providing a safe and healthy environment conducive to a higher quality of life. The acquisition of land opens opportunities for affordable housing and businesses to thrive, reinvigorating blighted areas and bolstering economic growth. Enhanced sidewalks and lighting contribute to improved safety, encouraging residents to remain in their homes and safeguarding existing affordable housing units.

The measurable outcomes of our project encompass an increase in housing units, economic growth indicators like job creation and heightened property values, lower crime rates due to improved lighting, and enhanced public spaces leading to an improved quality of life. Additionally, we aim to cultivate heightened community engagement and participation, serving as an indicator of our success in promoting neighborhood pride and cohesion. The preservation of existing affordable housing units will further underscore our project's success.

Upon the completion of grant-funded activities, our project will have achieved transformative impacts, including new affordable housing units and business spaces, fostering sustainable economic growth. The improvements in infrastructure and public spaces will lead to safer and more vibrant neighborhoods, creating a lasting and positive effect on the quality of life for our residents. These outcomes are tangible, enduring, and set the foundation for a brighter and more inclusive future.

Reduction of Housing Cost Burden

Our proposal is strategically designed to alleviate the housing cost burden for residents without raising additional costs. We aim to enable the production and preservation of affordable housing in close proximity to public transportation and other essential amenities, effectively reducing transportation expenses. Simultaneously, we seek to enhance the value of siting affordable housing near these amenities, public services, jobs, schools, and other vital community assets. Additionally, we will improve access to these amenities by upgrading sidewalks and street lighting in the area, further increasing the convenience and overall well-being of the community.

Reduction of the Most Significant Environmental Risks

The community faces some environmental challenges, such as outdated lighting systems that consume more energy and potential environmental hazards in the project area. In line with these concerns, our proposal focuses on promoting community resilience through sustainable practices. Upgrading the lighting to LED will improve energy efficiency and reduce the community's environmental impact. Additionally, we will conduct an Environmental Assessment to identify and address any potential environmental issues, ensuring the safety of residents. These measures aim to enhance housing affordability and make the community more adaptable to environmental changes in a positive and constructive manner.

Reduction of Affordable Housing Barriers

Our proposal aims to have a lasting impact on breaking down barriers that have historically contributed to segregation and limited access to well-resourced neighborhoods for protected class groups and vulnerable populations. By investing in affordable housing, we seek to provide more equitable housing options and address past disparities. Through thoughtful development and rehabilitation, we intend to create housing opportunities in diverse neighborhoods, ensuring that protected class groups and vulnerable populations have access to quality housing in areas offering important resources and opportunities for growth. This long-term effect of our proposal is about fostering inclusivity and promoting a more equitable and fair community for all residents.

Reduction of Community Distress and Economic Decline

By providing additional affordable homeownership opportunities, there is a greater likelihood of reducing the rental rate in the area which currently is greater than 60%. Increased homeownership opportunities allow for individuals and families to have a stake in the community, and with education, can further help in reducing decline and distress in the area.

Increased Housing Stock and Availability

The Comprehensive Housing Affordability Strategy (CHAS) data for Gastonia for the period of 2016-2020 supports U.S. Census statistical data that many persons within this census tract encounter between one to four housing affordability factors. By maintaining the current housing stock by offering repair opportunities for existing housing and creating additional units through new construction, creates a greater supply of housing for residents thereby expanding opportunity for greater housing choice. Increased housing supply and opportunity for fair housing choice whether through homeownership or rental opportunities, can attribute to a greater quality, of life for many low-income households.¹³

Increased Business Opportunity for Minority Businesses

Our strategy aims to enhance business opportunities for Minority and Women Business Enterprises (MWBEs) in our designated geographic area and may include and provide the opportunity to repurpose vacant commercial properties that cannot be rezoned for residential use. Our comprehensive plan encompasses key components, including infrastructure improvements, land acquisition for affordable housing and business expansion, sidewalk enhancements, improved lighting, and the development of parks.

In our commitment to promoting inclusivity and supporting MWBEs, we will engage in discussions with organizations and groups, such as Gaston County Health and Human Services, that are dedicated to the advancement of these enterprises. The MWBE definition we adhere to emphasizes the significance of ownership and control by minority persons or socially and economically disadvantaged individuals, ensuring that these businesses are genuinely owned and operated by those who meet the eligibility criteria.

¹³ U.S. Department of Housing and Urban Development. Comprehensive Housing Affordability Strategy, 2016-2020. <https://www.huduser.gov/portal/datasets/cp.html#year2006-2020>

This integrated approach is strategically designed to address barriers associated with affordable housing and business development, ultimately rejuvenating and stimulating economic growth in our targeted geographic area.

Improved Quality of Life

A greater sense of health, safety, and community engagement are all factors that contribute to the overall well-being and viability of a community. Through this grant, various initiatives can be implemented and completed to include:

1. Community education, engagement and involvement;
2. Increased safety through better lighting conditions and contiguous sidewalks;
3. Increased health and mental well-being through access to a community recreation facility;
and
4. Provides greater housing choice.

All factors greatly improve the quality of life for a community and create a higher community success rate when implemented together.

Model for Other Communities

This proposal serves as a replicable model for other communities, presenting a holistic approach to community development. By strategically acquiring land for affordable housing and business development, enhancing infrastructure, and incorporating a park, we create a balanced and sustainable community. The core principles of strategic planning, community engagement, compliance with regulations, and partnerships with stakeholders can be tailored to suit the unique needs of different communities, making our proposal a valuable template for those seeking to revitalize and enrich their own neighborhoods.

End of Performance Period-Vision of Success

Success at the end of the period of performance is envisioned as a substantial increase in the availability of affordable housing, resulting from the financing of construction or rehabilitation of housing units, land acquisition for new developments, and the conversion of commercial properties into affordable housing. We also aim to establish or assist a community development financial institution (CDFI) and provide technical assistance to entities involved in affordable housing. These initiatives are expected to alleviate cost burdens, reduce overcrowding, and address the identified need for affordable housing. Simultaneously, the investment in neighborhood amenities and infrastructure improvements will enhance public safety and make affordable housing more attractive. Success will be evident through increased community engagement and well-being, ultimately fostering community resilience.

EXHIBIT H: LETTERS OF SUPPORT/PARTNERS

City of Gastonia

Letter of Support/Partnership: Habitat for Humanity of Gaston County



October 24, 2023

RE: City of Gastonia - Letter of Support
for Federal Funding Opportunity for an Affordable Housing Initiative

Dear Sir or Madam:

Habitat for Humanity of Gaston County supports the City of Gastonia in its efforts to apply for federal funds for an affordable housing initiative. The City of Gastonia currently offers owner-occupied housing rehabilitation services to residents of Gastonia. The program is designed to assist persons of low- to moderate- income maintain continual residency by offering repair assistance up to \$25,000. Repairs can be made to multiple major operating systems such as electrical, floor, plumbing, roof and HVAC. If the City of Gastonia is granted additional funding, it allows for current program expansion and provides the ability to assist additional homeowners who have limited means to cover needed repairs and allow them to remain in housing that is affordable.

According to data from the Comprehensive Housing Affordability Strategy (CHAS) and the American Community Survey (ACS) the following statistics about homeowners:

- Of the 15,570 cost-burdened homeowners in Gastonia, 14,060 (90%) earn less than 50%Area Median Income (AMI),
- 19% of homeowners in Gastonia have difficulty affording their homes and
- At least 2,255 homeowners earning less than 50% of the AMI have at least one (1) housing problem.

We work with families who are in the income range of 30-60% AMI to perform critical home repairs for families who could not afford to do this on their own. This allows them to preserve their homeownership live in a safe and healthy environment while remaining in the home.

Habitat for Humanity of Gaston County supports the City of Gastonia's affordable housing initiative to provide housing rehabilitation services to low-income families so they can continue to maintain affordable housing.

Respectfully,

A handwritten signature in black ink, appearing to read "Lisa Quisenberry", is written over a horizontal line.

Lisa Quisenberry,
Interim Executive Director

1840 E Franklin Blvd Gastonia, NC 28054 • Phone: 704-864-6536 • info@habitatgaston.org
habitatgaston.org

Building homes, building community, and building hope.

Letter of Support/Partnership: City of Gastonia-Parks and Recreation Department



October 24, 2023

RE: City of Gastonia - Letter of Support for Federal Funding Opportunity for Pathways to Removing Obstacles to Housing Grant -Opportunity FR-6700-N-98

Dear Sir or Madam:

In September 2022, as part of the City of Gastonia Parks and Recreation Master Plan, the City of Gastonia acquired the former Salvation Army Boys & Girls Club property located at 1001 S. Marietta Street, Gastonia, NC 28052 (Gaston County Tax Parcel #111263). The parcel was a former facility owned by the non-profit organization that has been vacant for a number of years. The desired outcome of the purchase is to convert the property into a City community park. The property consists of approximately 5.72 acres with existing soccer fields, bleachers, parking areas and concession stand.

The park, located within census tract 328.01 is a predominately low- to moderate income area with approximately 2,558 residents. This park will be vital component of the community and provide recreational opportunities to community residents.

The Parks and Recreation Department is in support of this grant opportunity. Our staff is experienced in park development and maintenance, and where possible, our department's internal staff resources will be made available for various activities such as grading, landscaping, etc., which will allow for greatest cost effectiveness in the completion of this project.

We work with families who are in the income range of 30-60% AMI, and provide recreational opportunities through youth league sports. In doing so, our goal is to provide safe environments for children and their families to attain a higher quality of life within every community in Gastonia.

The Parks and Recreation Department of the City of Gastonia supports this grant initiative and it will help provide vital resources to include a community facility which are vital to support a healthy and productive lifestyle and environment.

Sincerely,

Tripp White
Parks and Recreation Director

Letter of Support/Partnership: Keep Gastonia Beautiful



October 24, 2023

RE: City of Gastonia - Letter of Support for Federal Funding Opportunity for Pathways to Removing Obstacles to Housing Grant -Opportunity FR-6700-N-98

Dear Sir or Madam:

Keep Gastonia Beautiful, Inc. is an affiliate of Keep America Beautiful, Inc., which is a national non-profit, public education organization dedicated to protecting natural beauty and improving waste handling practices in American communities. Keep America Beautiful, Inc. continues to educate millions of Americans on all aspects of waste handling and beautification practices, improving quality of life issues across the country. On the local level, Keep Gastonia Beautiful's mission is to make the community at large knowledgeable and responsible in natural resource conservation, solid waste handling, recycling, litter abatement and beautification. Keep Gastonia Beautiful is a unique organization, we are both a City recognized department with a working budget granted yearly from management and a recognized 501 (c)3 non-profit organization.

For more than 46 years, Keep Gastonia Beautiful has made it their sole mission to make our City a more beautiful place for citizens and visitors to live, enjoy, and be proud of. This can be seen through planting trees & flowers; helping to keep our city clean and reminding us to likewise, recognizing homes with enviable yards, helping citizens to recycle, decorating our streets and public areas for special occasions; and, perhaps most importantly, teaching our children the value of preserving our environment and natural resources. Over the past 15 years, we have added the installation of public art throughout our Center City to not only create attractive landmarks but also to inspire and motivate us as we visit the heart of our City.

Keep Gastonia Beautiful supports this grant opportunity and we have the tenure to incorporate meaningful contributions into Census Tract 328.1. Our staff is experienced in public art, community engagement, tree plantings and other beautification efforts and where possible, our department's internal staff resources will be made available for various activities to assist with the completion of this project. This grant opportunity is a perfect way for Keep Gastonia Beautiful to help encourage and modify behaviors of children and their families that attribute to a higher quality of life within Gastonia communities. Keep Gastonia Beautiful supports this grant initiative and will help provide vital resources that aid in beautification, conservation and improvement of the appearance and well-being of the community, which are all components that encourage a healthy and productive lifestyle and cleaner environment. If you have any questions, feel free to reach me at Juliann.Lehman@gastonianc.gov or (704) 869-1938.

Sincerely,

A handwritten signature in blue ink that reads "Juliann Lehman".

Juliann Lehman
Keep Gastonia Beautiful Administrator

CITY OF GASTONIA Housing & Community Engagement Office of Keep Gastonia Beautiful
• PO Box 1748 • Gastonia, NC 28053-1748 •
(704) 869-1938 • (704) 866-6067 fax

Letter of Support/Partnership: City of Gastonia-Neighborhood Program



October 24, 2023

RE: City of Gastonia - Letter of Support for Federal Funding Opportunity for Pathways to Removing Obstacles to Housing Grant -Opportunity FR-6700-N-98

Dear Sir or Madam:

The City of Gastonia's Alliance for Community Enrichment (A.C.E.) Program is created to develop and enhance partnerships with the City's communities and neighborhoods with the local government. Through community building programs, educational opportunities, and open dialogue between citizens and City personnel, the A.C.E. program strives to encourage neighborhoods to greater sustainability and comradery with the assistance of City services and resources.

The mission of the A.C.E. program is "To foster community enrichment and pursue a higher quality of life for citizens of Gastonia through partnerships and collaboration between citizens and the local government by way of neighborhood and community recognition."

A few of the community projects that the A.C.E. program has assisted with includes the development and support of community watch groups, providing resources (such as the Movie-in-a-Box program) to neighborhoods for community building events, offering matching grant opportunities for community members to develop projects to enhance their neighborhoods, and much more.

One of the partnerships we currently have within Census Tract 328.01 is with the York-Chester Neighborhood Association. The A.C.E. program has assisted this neighborhood with beautification projects and litter sweep assistance. The City is continuously seeking more partnerships with communities and is already working toward building relationships with citizens in this Census Tract in order to help identify community concerns and assist in resolving these concerns.

Our staff is experienced in building relationships with community members and developing partnerships to overcome community concerns and assist in achieving community-driven goals and where possible, our department's internal staff resources will be made available for various activities such as educational opportunities and resources for community building events in the completion of this project.

We provide opportunities for community members to share their concerns on a more personal level with the City of Gastonia and promote citizen participation in decision-making opportunities and City-sponsored events. In doing so, we help to encourage and modify behaviors of children and their families that attribute to a higher quality of life within Gastonia communities.

The Alliance for Community Enrichment (A.C.E.) Program supports this grant initiative and will help provide vital resources that aid in community building and sustainability leading to a higher quality of life for the community. If you have any questions, feel free to reach me at Tyler.Davis@gastonianc.gov or (704) 866-6907.

Sincerely,

A handwritten signature in black ink that reads "Tyler H. Davis". The signature is written in a cursive style.

Tyler H. Davis
Neighborhood Program Administrator
City of Gastonia

**APPENDIX A: PUBLIC HEARING/PUBLIC COMMENT PERIOD-
COMMENTS/QUESTIONS RECEIVED**

City of Gastonia

PURPOSE FOR PUBLIC HEARING AND COMMENT PERIOD

To obtain comments for the Pathways to Removing Obstacles to Housing (PRO Housing) FR-6700-N-98 Notice of Funding Opportunity (NOFO)

PUBLIC HEARING

A virtual public hearing was held via WebEx on Wednesday, October 18, 2023 at 1:00 pm¹⁴

PUBLIC COMMENT PERIOD

began on Thursday, October 12, 2023 and ended on Saturday, October 28, 2023.

QUESTION(S)	ANSWER(S)
No questions were received during the comment period.	N/A

COMMENTS
No comments were received during the comment period.

¹⁴City of Gastonia, PRO Housing Public Hearing, October 18, 2023,
https://gastonianc.gov/images/Community_Services/PRO_Housing_Grant_Public_Hearing_Recording_10.18.23.pdf

APPENDIX B: CERTIFICATIONS

City of Gastonia

Appendix B -- Certifications

Applicants to the PRO Housing program must use this Appendix to certify their compliance with various requirements. Applicants should complete the certifications relevant to them and submit them with their application. Please note that all applicants must complete the lobbying certification.

PRO HOUSING CERTIFICATIONS FOR ENTITLEMENT LOCAL GOVERNMENT APPLICANTS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative

- agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The submission of the PRO Housing application is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with PRO Housing funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Build America, Buy America (BABA) – It will comply with Title IX, Subpart A of the Infrastructure Investment and Jobs Act of 2021 (41 U.S.C. 8301 et seq.).

Public Participation – It is in full compliance with the PRO Housing streamlined public participation requirements found in Section VI.E of the PRO Housing NOFO.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with PRO Housing funds, it has developed its proposal so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The proposal may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional PRO Housing Certification).

2. Overall Benefit. The aggregate use of PRO Housing funds shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons.
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with PRO Housing funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if PRO Housing funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with PRO Housing funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than PRO Housing funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than PRO Housing funds if the jurisdiction certifies that it lacks PRO Housing funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

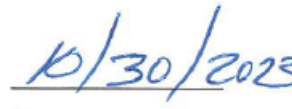
Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K and R; and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

Compliance with RFRA -- The grant will be conducted and administered in conformity with the requirements of the Religious Freedom Restoration Act (42 U.S.C. 2000bb) and 24 CFR 5.109, allowing the full and fair participation of faith-based entities.

Environmental Review -- It will comply with environmental review procedures and requirements at 24 CFR parts 50 and 58.

Compliance with Laws -- It will comply with applicable laws.


Signature of Authorized Official


Date

City Manager
Title

APPENDIX C: CODE OF CONDUCT
City of Gastonia

CODE OF CONDUCT

Gastonia abides by the City of Gastonia Human Resources Policy Code of Ethics as last updated on February 2023, pages 34-35 and noted below:

SECTION IV GENERAL WORKPLACE POLICIES

CODE OF ETHICS as public officials, City employees are charged with upholding the trust of the citizens of the City of Gastonia, obeying relevant laws and acting with integrity in all matters related to representing the City government.

CODE OF ETHICS POLICY:

- a. Standards of Conduct for Public Officials and Employees adopted pursuant to G.S. 160A-86
- b. It is the obligation of every public official and employee to support the Constitution of the United States and the Constitution of the State of North Carolina. (Oath of Office and Gastonia Code of Ordinances 4-81)
- c. Public officials should take care to obey all laws that apply to their official actions. They should be guided by the spirit of the law as well as the letter.
- d. The laws of the Nation, State and Municipality shall be impartially administered. No public official or employee shall grant any special consideration, treatment or advantage to any citizen beyond that which is available to every other citizen except by due process of law. (G.S. 160A-146)
- e. Public officials and employees should act with integrity, free from improper influence as they exercise the functions of their office or position.
- f. Elected officials should use their best independent judgment when carrying out the duties of their office, while recognizing that they are part of a larger group. They should never lose sight of the fact that they are not generally authorized to act on behalf of the City Council. The City Council must take official action as a body.
- g. Every citizen shall receive a fair and impartial hearing on any matter coming before the City Council, its appointed agencies or any employee of the City. No public official or employee shall make any promise or pledge to any person concerning any matter to be heard before a public official or employee except upon fair, impartial and final hearing thereof.
- h. The conduct of public business shall be free of any hidden personal or financial interest of any public official or employee. No public officials or employees shall advocate in any public meeting or private discussion any matter in which they have a personal or financial interest except upon full and timely disclosure of the interest. (G.S. 14-234)
- i. It is the obligation of every public official to faithfully discharge the duties of office. Public officials should be faithful in their attendance at meetings and in their preparation for meetings.

Public officials shall make full and timely disclosure of any personal or financial interest which they have in any matter of public business to be transacted before them. (G.S. 160A-75)

- j. The conduct of public business shall be free of any influence arising from gifts, favors or special privileges. It is the obligation of every public official and employee to refuse personal gifts, favors or special privileges in every instance where such public official or employee reasonably believes such gift, favor or special privilege would not have been extended but for the position of such public official or employee, or where there exists a reasonable belief that the giver's interests are likely to be affected by the actions of the public official or employee, or where the gift is or may reasonably be considered to be designed to influence the actions of the public official or employee. No public officials or employees shall seek personal or financial advantage by means of their public office, appointment or employment. (G.S. 133-32)
- k. The use of public trust for private gain is inimical to good government. No public official or employee shall violate the provisions of North Carolina General Statutes Section 14-234. No public official or employee shall use confidential or advance information obtained by virtue of public office, appointment or employment for personal or financial advantage. (G.S. 14-234).
35
- l. Overall, public officials should avoid impropriety in the exercise of their official duties. A public official is acting with impropriety if a reasonable person who is made aware of the totality of the official's actions would conclude that it was more likely than not that the behavior did not befit someone in the public official's position.
- m. It is the obligation of every public official and employee to carry out the lawful orders and policies of the City Council. No public official or employee shall knowingly take any action inconsistent with the lawful orders or policies established by the City Council. No public official or employee shall knowingly take any action which would be detrimental to the best interest of the City.
- n. City Council members and other public officials should conduct the affairs of the City in an open and public manner. They shall comply with all applicable laws governing open meetings and public records. Public officials and employees should avoid unjustified delay in fulfilling public records requests.¹⁵

¹⁵ City of Gastonia. Personnel Manual. February 2023.