



Housing & Neighborhoods Staff
150 S. York Street
Gastonia, NC 28052
(704) 866-6752

City of Gastonia/Gastonia Consortium

ANNUAL ACTION PLAN DRAFT

July 1, 2015 – June 30, 2016

YEAR 1

Public Comment Period

March 9, 2015 – April 9, 2015

NOTICE OF PUBLIC HEARING
FIVE YEAR CONSOLIDATED PLAN 2015-2020
2015/2016 ANNUAL ACTION PLAN
COMMUNITY DEVELOPMENT
BLOCK GRANT PROGRAM

The City of Gastonia Housing and Neighborhoods Division will hold the following PUBLIC HEARINGS:

- **Monday March 9, 2015 – 9:30 AM City Hall Council Chambers 181 S. South Street, Gastonia, NC 28052**
- **Monday April 6, 2015 – 6:00 PM City Hall Council Chambers 181 S. South Street, Gastonia, NC 28052**

The purpose of the public hearing is to obtain views from the public and service agencies on:

1. Five (5) year Consolidated Plan – intended to assist communities in developing a collaborative process whereby the community establishes a unified vision for community development actions.
2. Annual Action Plan - to report what activities the City plans to undertake during the 2015-2016 program year and identify other actions that will be taken to meet the objectives of the Strategic Plan.

The plans will address the economic, physical, social, and human development needs of low/mod income residents in Gastonia, the HOME Consortium Area and the Gaston/Lincoln/Cleveland County Continuum of Care. All Neighborhood/Community Organizations, Non-profit Organizations, Public and Private Housing Providers, and Citizens of Gastonia and Gaston County are invited to attend and voice your concerns on the needs of the area. "INDIVIDUALS REQUIRING SPECIAL ACCOMMODATIONS AT THIS PUBLIC HEARING SHOULD CALL THE ADA COORDINATOR AT (704) 866-6861 OR (704) 866-6863 FOR TDD USERS WITHIN 48 HOURS OF THE PUBLIC HEARING."

For additional information, please call (704) 866-6752

Myra T. Nichols,
Housing and Neighborhoods Administrator
City of Gastonia

2-C February 25, 2015
March 25, 2015

**PUBLIC NOTICE
CITY OF GASTONIA
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
2015 - 2020 CONSOLIDATED PLAN
AND
2015-2016 ANNUAL ACTION PLAN
COMMENT PERIOD**

The public is hereby notified that the City of Gastonia is submitting for public comment the Community Development 2015-2020 Consolidated Plan and the Annual Action Plan for the 2015-2016 program year. The Consolidated Plan and Annual Action Plan will be presented to City Council on Tuesday, May 5, 2015. A copy of the documents will be available for public review and comment for a period of 30 days beginning Monday, March 9, 2015 through Thursday, April 9, 2015, at the office of the Housing and Neighborhoods Division, 150 S. York Street between the hours of 8:30 a.m. and 4:30 p.m. Monday through Friday. The documents will be available on the City of Gastonia's website at www.cityofgastonia.com and the following locations:

T. Jeffers Community Center	2311 Whitener Street
Phillips Community Center	2031 Echo Lane
Erwin Community Center	913 North Pryor Street
Bradley Community Center	1200 North Modena Street
Gaston County Public Library	1555 East Garrison Blvd. - Reference Section
Gastonia Housing Authority	340 Long Avenue

Written comments may be addressed to
Myra T. Nichols,
Housing & Neighborhoods Administrator,
City of Gastonia,
PO Box 1748,
Gastonia, NC 28053-1748

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		
CDBG	HUD	Housing, Public Service, Organization capacity building	\$715,851	\$8,782	\$0	\$724,633	Addressing targeted neighborhoods to improve housing and employment opportunities
HOME	HUD	Housing	\$545,877	\$20,563	\$0	\$566,440	Assist low to moderate income households to obtain decent and safe housing

Table 1 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The matching requirements will be met through the following sources:

- City of Gastonia
 - providing office space and support to RIC
 - provides funding
 - provides staff
- United Way
 - Provides funding
- COC member agencies
 - Provides funding
- Habitat for Humanity
 - In-kind services for new construction and rehabilitation
- Local Banks
 - Assist with the Homebuyers Assistance Program using the CRA products to provide affordable mortgages to low to moderate income families

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Discussion

The HOME funding is designated for use throughout Gaston County for income qualified households. These funds are designated for housing assistance. Housing Authority properties are publically owned.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

CDBG

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Promote safe decent affordable housing	2015	2016	14A, 14F	Gastonia	Housing	CDBG	Affordability
2	Generate economic opportunity	2015	2016	12, 17D	Gastonia	Employment	CDBG	Affordability, Economic Opportunity
3	Ensure equal opportunity in housing	2015	2016	05I	Gastonia	Housing	CDBG	Availability, Accessibility
4	Strengthen communities within the Consortium	2015	2016	05	Gastonia	Housing	CDBG	Availability
5	Promote the development and participation of community based organizations	2015	2016	19C	Gastonia	Housing	CDBG	Availability, Accessibility

Table 2 – Goals Summary

HOME

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Promote safe decent affordable housing	2015	2016	14H, 12, 05S, 05T	Gaston County Gastonia	Housing	HOME	Affordability
2	Promote the development and participation of community based organizations	2015	2016	21I	Gaston County	Housing	HOME	Affordability
3	Increase home ownership opportunities	2015	2016	13	Gaston County	Housing	HOME	Affordability
4	Maintain high standards	2015	2016	21A	Gaston County	Housing	HOME	Successful administration of programs

Table 3 – Goals Summary

Goal Descriptions

1. Promote safe decent affordable housing

Assist low to moderate income households with:

- New units
- Downpayment assistance
- Rental assistance
- Utility assistance
- Mentoring
- Energy efficiency improvements
- Rehabilitation of units

2. Promote the development and participation of community based organizations

- Work with community organizations to improve their service delivery capacity and abilities.
- Provide opportunities to leverage HUD funding with other private/public sources to build affordable housing units

AP-35 Projects - 91.420, 91.220(d)

Introduction

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

CDBG

#	Project Name	Amount	Priority Rationale	Obstacles
C1	General Administration	\$120,476	Required to administer program	None
C2	Project Delivery	\$31,340	Execute housing programs	None
C3	Section 8 Loan Repayment	\$152,035	Required under provisions of agreement with HUD	None
C4	Fair Housing	\$7,659	Disseminate information on Fair Housing	Access to all persons requiring the information
C5	Public Service Subrecipients	\$5,000	Provide needed supplies to agencies serving the low to moderate income residents	None
C6	Homeless Technical Assistance	\$35,000	Implement 10 Year Plan to end Chronic Homelessness	None
C7	NC-HMIS	\$20,000	License fee for COC to participate in system	None
C8	Housing Rehabilitation Program	\$340,123	Upgrade substandard housing, emerge efficiency and utilities	None
C9	Property Disposition/Maintenance	\$3,000	Property maintenance	None
C10	HOPE 4 Gaston	\$10,000	Minor home repair to preserve existing housing stock and improve substandard conditions	None

Table 4 – Project Information

HOME

#	Project Name	Amount	Priority Rationale	Obstacles
H1	General Administration	\$54,178	Required to administer program	None
H2	CHDO Housing	\$81,882	Reinvestment in Communities receives 15% of allotment for improved housing	None
H3	Reinvestment in Communities capacity building	\$20,000	Supporting agencies serving the low to moderate income residents	None
H4	Ownership Assistance	\$85,861	New construction	None
H5	Direct Ownership	\$284,519	Downpayment assistance	None
H6	TBRA	\$40,000	Rental Assistance	None

Table 5 – Project Information

AP-38 Project Summary

Project Summary Information

CDBG FUNDING

1. Program Administration

- A. General Administration: \$120,476** - Funds allocated for salaries, fringe benefits and general expenses for administration of the Housing & Neighborhoods Community Development Programs (i.e. legal fees, supplies, dues and subscriptions, advertising, etc.);

Strategic Goal:	Maintain high standards of accountability, management and ethical work practices
Matrix Code:	21A General Program Administration 570.206
Specific Objective:	N/A
Proposed Outcome:	Successful administration of CDBG Programs
Performance Measure:	Approval of CAPER

B. Project Delivery Costs: \$31,340

Funds allocated for salaries, fringe benefits and general expenses in the execution of the rehabilitation/new construction, affordable housing programs.

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	14H Rehabilitation Administration 570.202 13Direct Homeownership Assistance 570.201(n)
Specific Objective:	Decent Affordable Housing
Proposed Outcome:	Affordability
Performance Measure:	90% of units inspected will receive rehabilitation assistance or down payment assistance

2. Section 108 Loan Repayment

A. (108 PI Funds) \$152,035 — Loan Repayment on Section 108 loan programs.

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	19F Planned Repayment of Section 108
Specific Objective:	Decent Affordable Housing
Proposed Outcome:	Affordability
Performance Measure:	100% required payment completed

3. Public Services

A. FAIR HOUSING/MBE: (CDBG Funds) \$7,659 Funds allocated for general expenses for fair housing administration, fair housing activities, fair housing hot line and minority recruitment of contractors.

Strategic Goal:	Ensure equal opportunity in housing
Matrix Code:	05J Fair Housing activities (CDBG) 570.201(e)
Specific Objective:	Improve access to decent affordable rental housing
Proposed Outcome:	Availability/Accessibility
Performance Measure:	100% of persons with fair housing inquiries will receive assistance and fair housing issue will be resolved or referred; 100 persons will receive fair housing education in conjunction with the homebuyer education and counseling program

B. Subrecipients (CDBG Funds) \$5,000 — The City of Gastonia through its Citizens Participation Process has developed a Consolidated Plan that lists local housing and non-housing community development priority needs. The Non-profit Reimbursement Program is designed to assist Continuum of Care and other service providers serving low/mod income limited clientele, with supplies and equipment needed for operation.

Strategic Goal:	Strengthen communities within the Consortium
Matrix Code:	05 Pubic Services (General) 570.201(e)
Specific Objective:	Suitable Living Environment
Proposed Outcome:	Availability
Performance Measure:	100% of agencies assisted will serve low to moderate income clientele

4. Continuum of Care Homeless Strategy and Chronic Homelessness Technical Assistance

A. Homeless Technical Assistance: (CDBG Funds) \$35,000 — Funds allocated to provide technical assistance and build capacity for the homeless strategy; to develop and implement the Ten Year Plan to End Chronic Homelessness.

Strategic Goal:	Promote the development and participation of community-based organizations
Matrix Code:	19C CDBG Non-profit Organization Capacity Building
Specific Objective:	Suitable Living Environment; End chronic homelessness; Coordinate Super Nofa Applications for COC
Proposed Outcome:	Availability/Accessibility. Four capacity building informational meetings for non-profit staff
Performance Measure:	100% of capacity training meetings held

B. NC-HMIS: \$20,000 — Funds allocated for license fee for the Gaston/Cleveland/Lincoln Continuum of Care to participate with the NC HMIS system as required by HUD.

Strategic Goal:	Promote the development and participation of community-based organizations
Matrix Code:	19C CDBG Non-profit Organization Capacity Building
Specific Objective:	Suitable Living Environment; End chronic homelessness; Coordinate Super Nofa Applications for CoC
Proposed Outcome:	Availability/Accessibility. Four capacity building informational meetings for non-profit staff
Performance Measure:	100% of capacity training meetings held

5. Housing/Community Development Activities

A. Rehabilitation Program - \$340,123 – A program designed to assist low to moderate-income families address health and safety issues, Housing Quality Standards (HQS), energy conservation, handicap accessibility, and water/sewer taps. Funding provided for approximately (14) families. Rehab activities for low to moderate-income families within the city limits of Gastonia. Funding provided for approximately (8) families.

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	14A Rehab; Single-unit Residential 570.202 14F Energy-Efficiency Improvements
Specific Objective:	Improve the quality of decent affordable owner housing
Proposed Outcome:	Affordability
Performance Measure:	90% of units inspected will receive rehabilitation assistance; 100% of homeowners will receive literature on lead based paint.

B. Property Disposition/Maintenance \$3,000 – Weed cutting, maintenance and repairs, utilities and gas service for properties owned by Housing and Neighborhoods currently or newly acquired.

Strategic Goal:	Increased homeownership opportunities
Matrix Code:	02 Disposition 570.201(b)
Specific Objective:	Decent affordable owner housing
Proposed Outcome:	Affordability
Performance Measure:	100% of properties maintained until disposition

C. HOPE 4 GASTON: (CDBG Funds) \$10,000 - Funds allocated to provide minor home repair to homeowners living in documented Low/Mod Income Areas

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	14A Rehab; Single-unit Residential 570.202 14F Energy-Efficiency Improvements
Specific Objective:	Improve the quality of decent affordable owner housing
Proposed Outcome:	Affordability
Performance Measure:	15 homeowners in L/M area assisted with minor repairs

HOME FUNDING

1. Program Administration

B. General Administration: \$54,178 - Funds to supplement salaries and general expenses for the administration of the HOME Program.

Strategic Goal:	<i>Maintain high standards of accountability, management and ethical work practices</i>
Matrix Code:	<i>21A General Program Administration 570.206</i>
Specific Objective:	N/A
Proposed Outcome:	<i>Successful administration of HOME Programs</i>
Performance Measure:	Approval of CAPER

2. COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO)

A. HOME Funds - set-aside - \$81,882 - Reinvestment in Communities, Inc. (RIC) is the designated CHDO and will receive 15% of the HOME allocation. The funds will be used to develop affordable housing for low/mod income families and individuals with emphasis on special needs populations.

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	12 Construction of housing 570.201(m)
Specific Objective:	Increase the supply of decent affordable housing
Proposed Outcome:	Affordability
Performance Measure:	Predevelopment and construction of 4 units

B. COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO): (HOME Funds — capacity building/operating expense) \$20,000 - Reinvestment in Communities, Inc. (RIC) is the designated CHDO and will receive 5% of the HOME funds for capacity building activities and operating expense.

Strategic Goal:	Promote the development and participation of community-based organizations
Matrix Code:	2I1 HOME CHDO Operating Costs
Specific Objective:	Improve access to decent affordable housing
Proposed Outcome:	Affordability
Performance Measure:	Satisfactory monitoring of projects with 95% client file accuracy

3. Housing Activities

A. New Construction - Homeownership Assistance: \$85,861
New construction of affordable housing unit.

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	12 Construction of Housing 570.201(m)
Specific Objective:	Increase the availability of decent housing
Proposed Outcome:	Affordability
Performance Measure:	100% of construction and unit sold as affordable housing

B. Direct Homeownership Assistance: (HOME Funds) \$284,519

This program provides up to \$5,000 down payment and closing cost assistance to approximately 60 qualified low/mod income homebuyers.

Strategic Goal:	Increase homeownership opportunities
Matrix Code:	13 Direct homeownership assistance 570.201(n)
Specific Objective:	Improve access to decent affordable housing
Proposed Outcome:	Affordability
Performance Measure:	95% of homebuyers receive assistance with downpayment and/or closing costs; 100% of applicants receive literature on budgeting, credit, lead based paint

C. Tenant-based Rental Assistance (TBRA): \$40,000 — A rental subsidy program to help individual households acquire permanent housing. The TBRA Program is part of the strategy to end chronic homelessness by offering assistance for a period not to exceed 24 months and will be administered by Reinvestment in Communities, Inc.

Strategic Goal:	Promote safe, decent affordable housing
Matrix Code:	05S Rental housing subsidies (HOME) 570.204 05T Security Deposit
Specific Objective:	Decent Affordable Housing
Proposed Outcome:	Affordability
Performance Measure:	100% of persons meeting programs criteria assisted with TBRA

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Geographic Distribution

There are presently four areas within the City/County with concentrations of racial/ethnic minorities and low income families. These areas are

Census Tracts

- 318.00
- 319.00
- 320.00
- 332.01

HOME Funding

Target Area	Percentage of Funds
Gaston County/ Gastonia	100%

Table 6 - Geographic Distribution

Applicants buyers for housing assistance must reside in Gastonia, Belmont, Bessemer City, Cherryville, Cramerton, Dallas, Lowell, McAdenville, Mount Holly, Ranlo, Stanley, or in the unincorporated areas of Gaston County.

CDBG Funding

Target Area	Percentage of Funds
City of Gastonia	100%

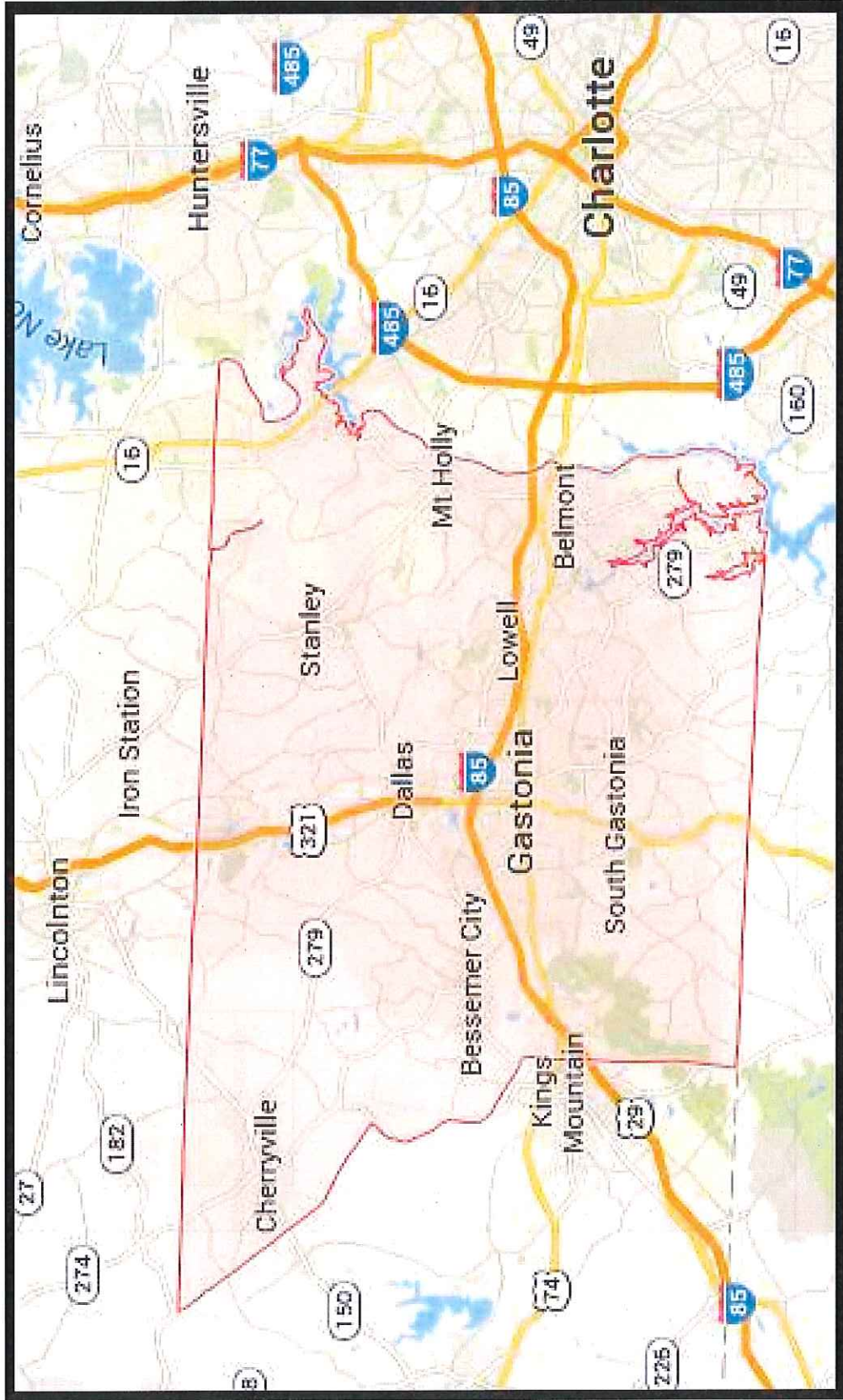
Concentrated in the Highland area Census Tract 320.00

Rationale for the priorities for allocating investments geographically

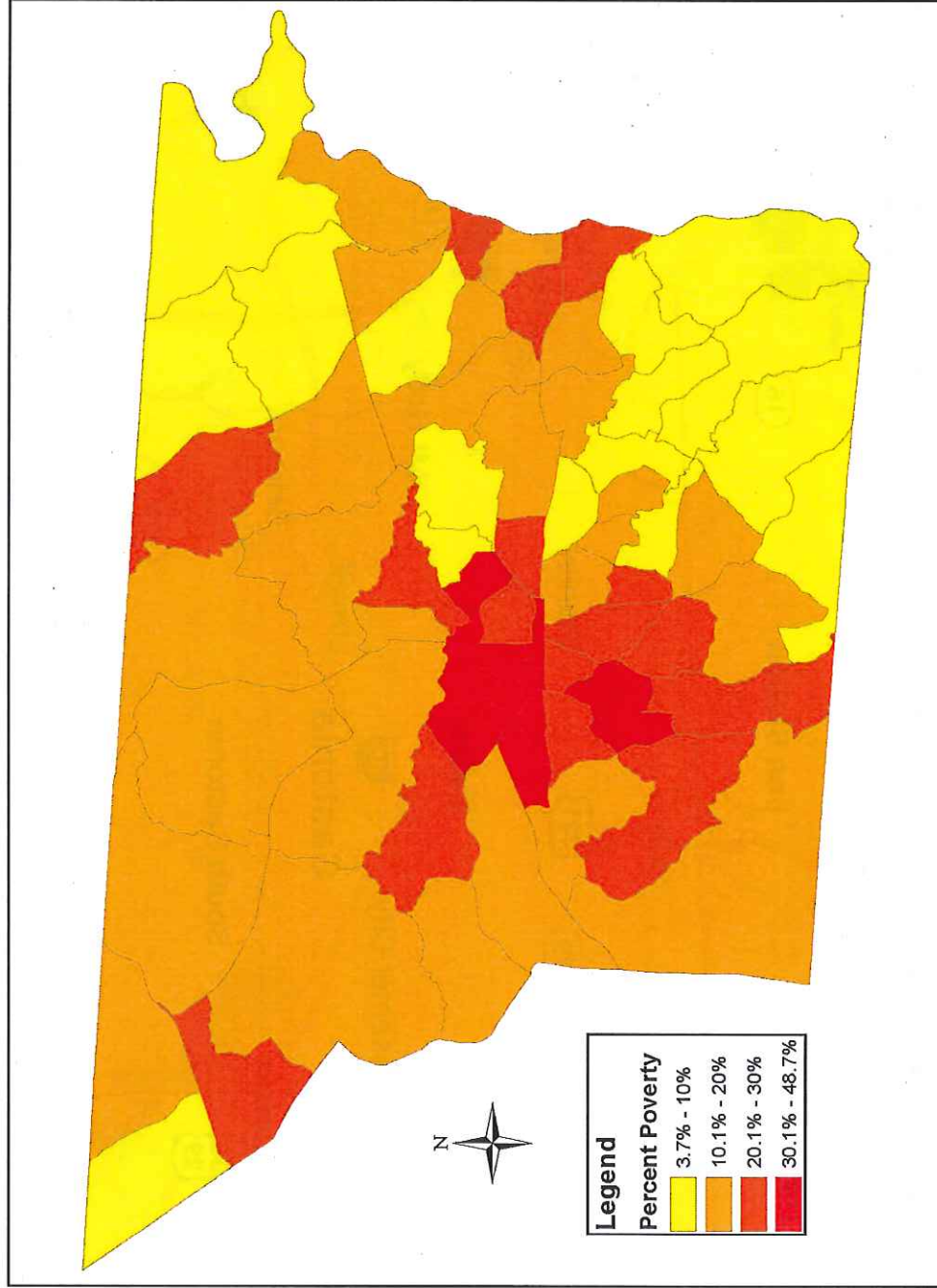
Discussion

Concentrations of low to moderate income households, significant existence of substandard housing and lack of affordable housing.

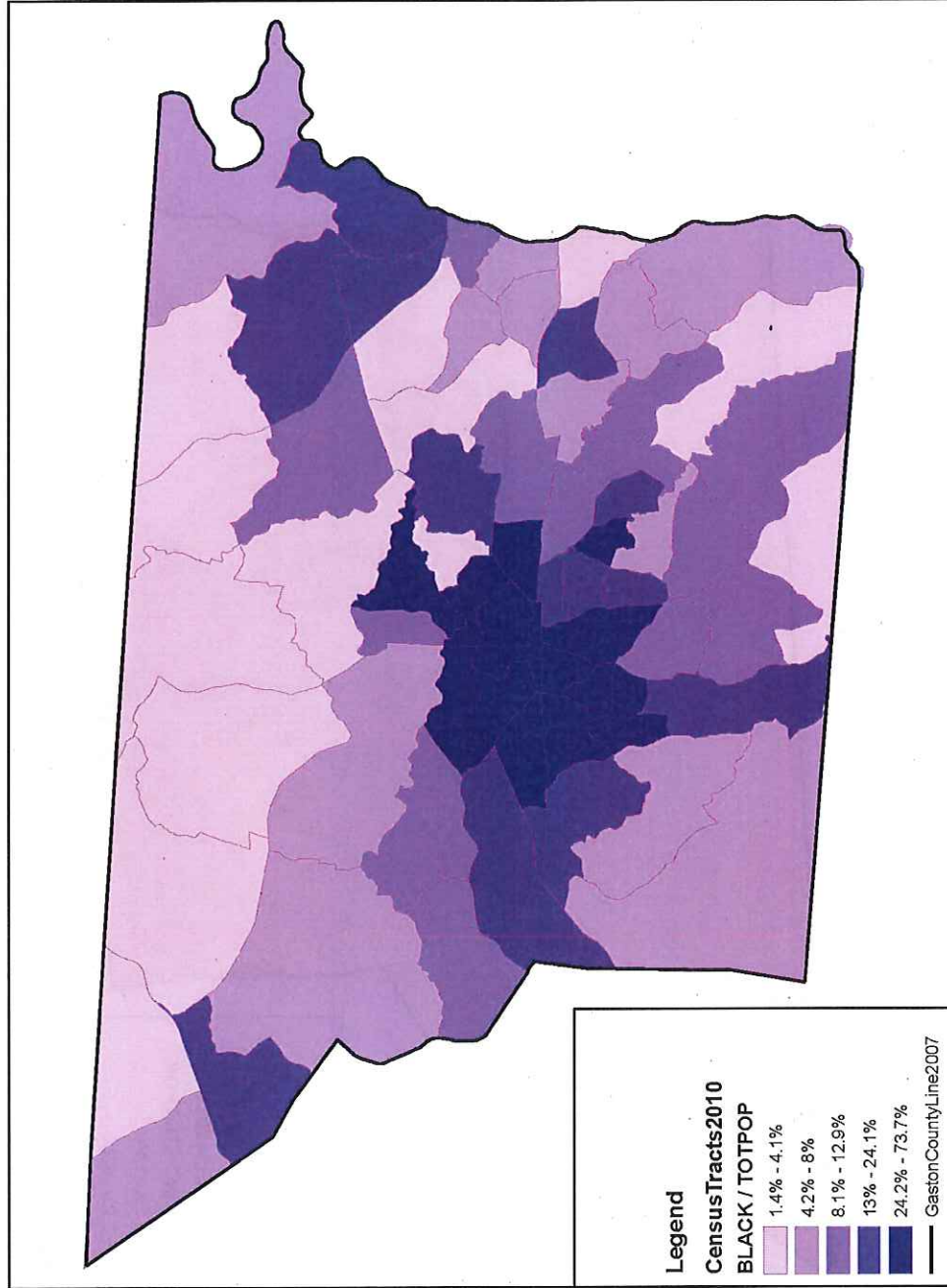
Location Map



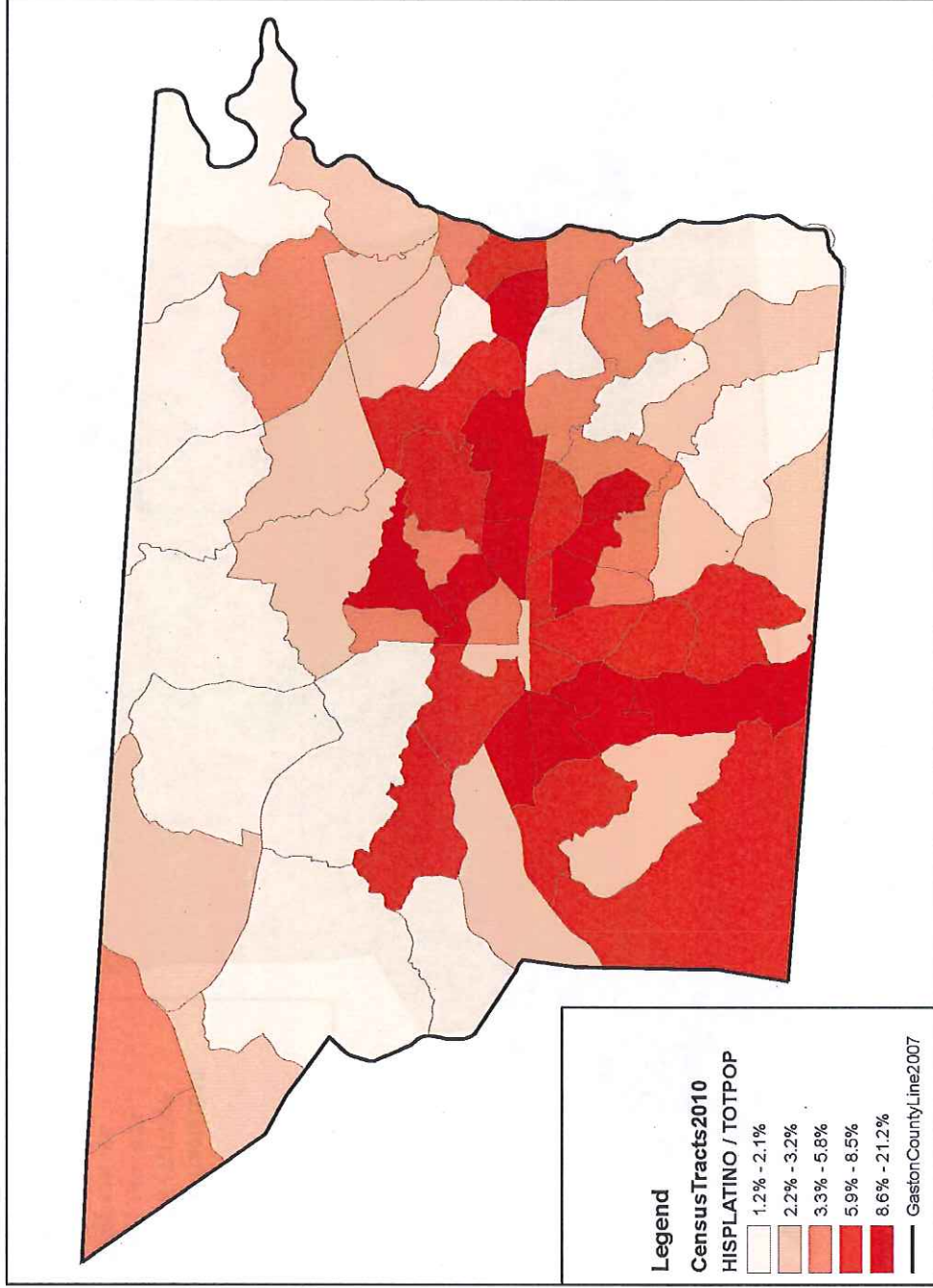
Distribution of Poverty



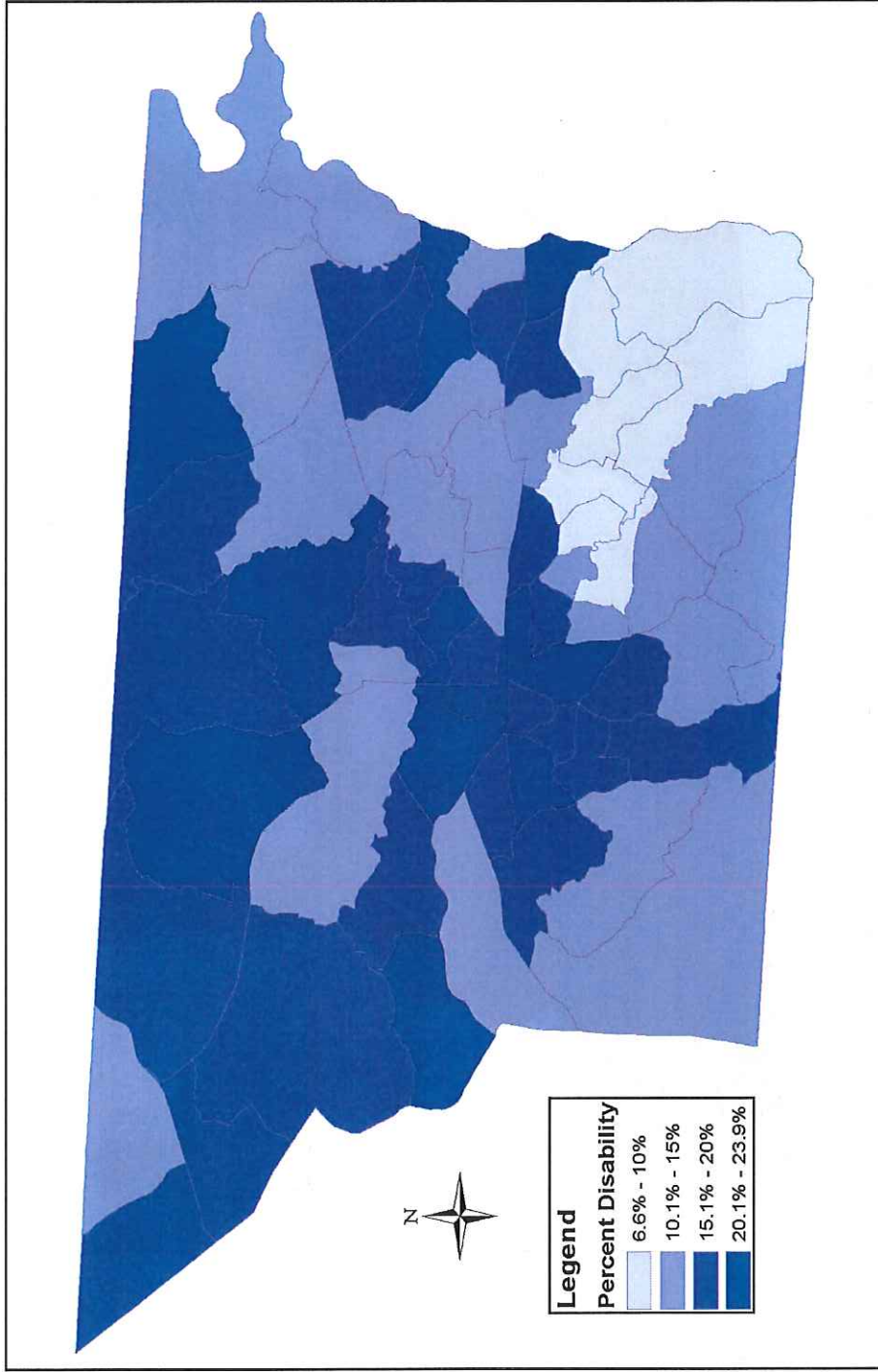
Black Population



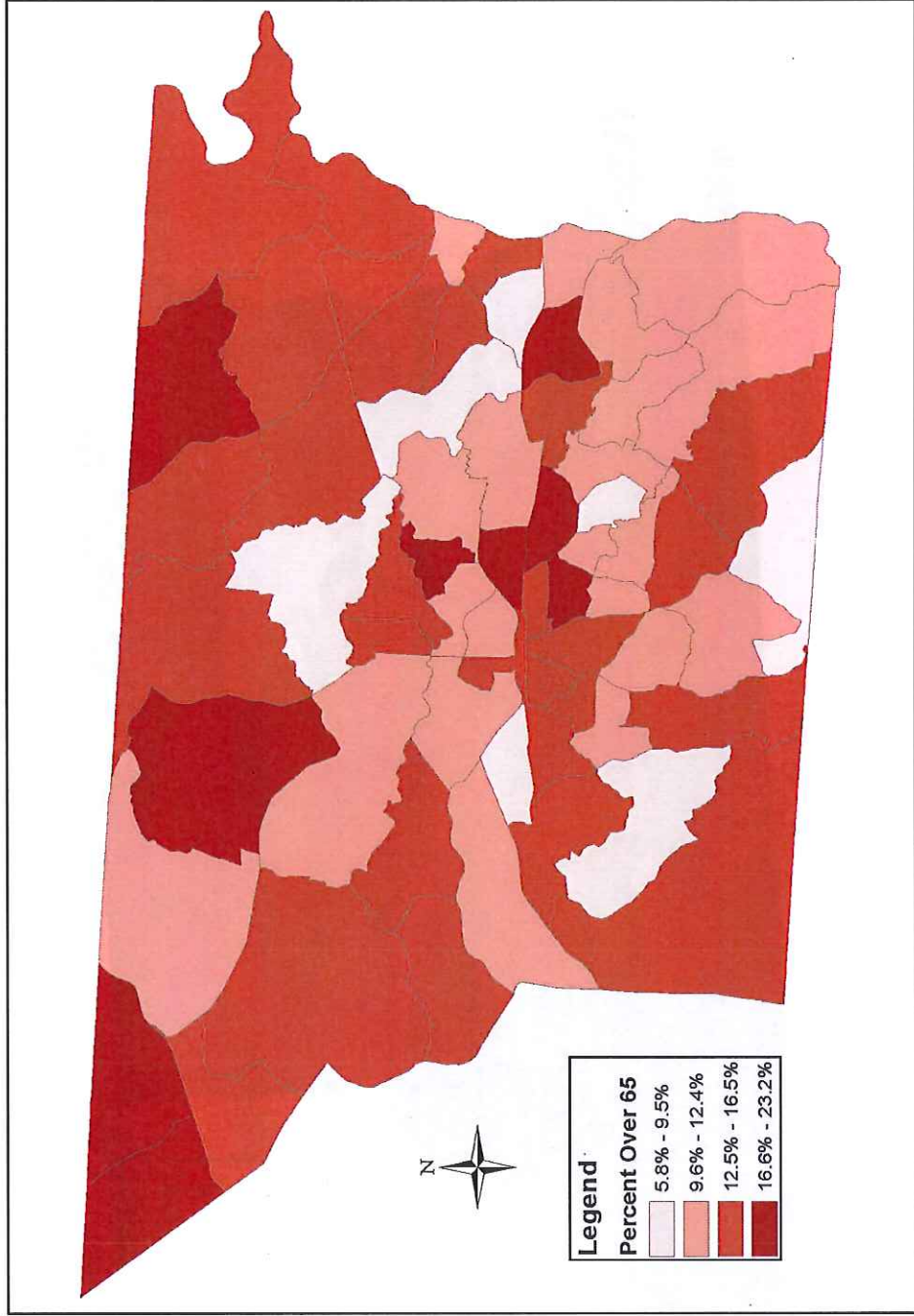
Hispanic Population



Disabled Population



Population over 65



Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless (unsheltered)	167
Non-Homeless	60
Special-Needs	20
Total	247

Table 7 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	Program	
Rental Assistance	10	TBRA
The Production of New Units	5	HOME CHDO set-aside; New Construction
Rehab of Existing Units	37	CDBG Rehabilitation; Hope 4 Gaston
Acquisition of Existing Units	60	Direct Homeownership Assistance
Total	112	

Table 8 - One Year Goals for Affordable Housing by Support Type

Discussion

Need is for rental assistance for low to moderate income households, the elderly and special needs. The ability to support housing units is limited by the funds available.

Priority housing needs identified through the public participation process include:

1. Affordable and/or accessible housing;
2. Special needs supportive housing; and
3. Substandard Housing

Using these categories priorities shall be:

Highest Priority:

- Increase the supply of rental housing units for Very Low and Low Income households
- Increase in availability of units for the elderly

Medium Priority:

- Correct Substandard Housing

Lowest Priority:

- Housing for Disabled Community
- Housing for Large Families

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

Actions planned during the next year to address the needs to public housing

Actions to encourage public housing residents to become more involved in management and participate in homeownership

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Discussion

1- There are three PHAs in the Gastonia Consortium area: Gastonia, Belmont and Mount Holly; however, both Belmont and Mount Holly are considered to be within the State of North Carolina Consolidated Plan jurisdiction since CDBG entitlement is designated only for the City of Gastonia. Therefore, the responses to the Public Housing questions shall be confined to the Gastonia Housing Authority only.

The Gastonia Housing Authority is funded through the Office of Housing and Urban Development. Local housing authorities are funded on a calendar year basis and typically do not receive notification of award until several months into the new year. For that reason, the following are projections only: Public Housing subsidy- \$1.9 million / Section 8 housing assistance payment funding- \$6.5 million. These projections are based on past funding levels.

The Public Housing Program consists of 400 apartments. The only units' available taking applications are ones designated for the elderly and the disabled/independent living units. Currently there are 892 families on the waiting list.

The Section 8 Program has 1,280 vouchers under contract, but can only use the number of vouchers funding will support. There are currently 585 families on the waiting list.

The capital improvement budget for the GHA for the years 2010-2014 was allocated to projects that benefitted the residents. The types of projects that were undertaken were:

- Air conditioning improvements
- Roofing
- Asbestos tile abatement
- Replacement of cabinets
- Termite treatments
- Landscaping
- Smoke detectors

- Appliances
- Replacement of screen doors
- Garbage collection enclosure
- Drain line replacement
- Under slab plumbing upgrades
- Painting

The GHA is continuing to develop capital improvement plans for any outdated units.

Public Housing has a shortage of affordable housing for all eligible populations including; households at or below 30% of AMI, at or below 50% of AMI, units for the elderly, disabled individuals, families with special needs. There is a shortage of one bed room and efficiency units.

2- The consortium (COC) will continue its ongoing strong relationships with the area public housing agencies. The individual public housing agencies also will continue to have a seat at the COC.

Those agencies currently on the active list/roster of the COC are:

- USDA Rural Development
- Gastonia Housing Authority (GHA)

The GHA has a public/resident involvement program that has been in existence for a number of years. That program is evaluated and changes are made to it in the event that one type of contact with residents is not up to par. This input program involves all the existing residents to the best of their ability. Meetings are held, advertised and posted on the properties in an area that is accessible to all. Announcements are made during other community gatherings, and the individual staff make sure that the residents are aware of the meetings and different ways that they can become more involved in the management and ownership.

The consortium will continue in its outreach efforts to the other housing agencies in the area and all low and moderate income residents.

3- The Gastonia Housing Authority is not described as troubled.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Addressing the emergency shelter and transitional housing needs of homeless persons

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Discussion

Priorities for addressing the homeless population are:

- Better utilization of existing sheltered beds
- Victims of Domestic Violence and their children
- Chronic Homeless
- Adults with Serious Mental Illness
- Adults with Substance Abuse Disorder

The Chronic Homeless population is 90 out of the 423 persons (21%) identified in the PIT. The majority of this group is Unsheltered. There are 2 homeless families with a total population of 4 (0.9%). All of these persons are Sheltered.

Every effort is made to address the needs of this group to break the cycle of homelessness. Lack of employment impedes the progress for the chronic homeless.

A continuum of care system is in place and active to address the multi-needs of Individuals and families who become homeless. The Strategic Plan of the COC is listed below and specifics are addressed in the adopted Ten Year Plan to End Chronic Homelessness – Gastonia.

Objective 1:

Create new permanent housing beds for chronically homeless individuals. The COC annually makes application for funding both with HUD and the State of NC to construction housing with rental subsidy and to advocate other funding sources to provide leasing assistance within market rate apartments. HOME Set-Aside for the designated CHDO is used to leverage public and private dollars to create housing opportunities for disabled homeless, with priority given to chronic homeless. Pathways LME provide predevelopment cost on proposed construction and/or rehabilitation projects developed for persons with disabilities. Tenant preference is given to homeless and chronic homeless. The COC will continue to apply for SPC units and Housing First Bonus funds.

Objective 2:

Continue to strive for a percentage of homeless persons staying in permanent housing over six months to at least 77%. The designated CHDO has 15 housing units specifically for disabled homeless and gives priority to chronic homeless. HOME funds are used as a temporary source of TBRA. Chronic homeless and disabled homeless are stabilized through this housing program. They are provided a monthly stipend/loan for personal needs, assisted with receiving entitlements such as food stamps and Medicaid and assisted with the disability application process. Due to long wait lists for other subsidized housing, tenants are assisted in getting on these wait lists while awaiting disability benefits. Once benefits are received and other subsidized housing becomes available, they are encouraged to move to a more self-sufficient. Case management services are provided through other community resources.

Objective 3:

Continue to reach a percentage of homeless persons moving from transitional housing to permanent housing to at least 65%. COC members and stakeholders maintain open dialogues, working as a team to refine existing programs. As a long term goal, COC members have considered transitioning to all permanent supportive housing for disabled homeless individuals in lieu of transitional housing programs.

Objective 4:

Continue to reach a percentage of persons employed at program exit to at least 20%. COC member agencies that house homeless participants are challenging the participants with certain requirements that should be accomplished as part of the program criteria including job readiness training and job search. COC member agencies provide participants receiving disability with information on SSA Ticket to Work program.

Objective 5:

Decrease the number of homeless households with children. As a main tool to address homeless households with children, the Gastonia PHA gives preference to families. Additionally, because of the extensive local community supported programs that provide funds for homeless prevention, the number of homeless families have been minimal. During the 2014 PIT Count there were 2 homeless families with children.

The City has adopted a Ten Year Plan to End Chronic Homelessness and this group is targeted from the Housing Authority and other organizations. As a long term goal, COC members have considered transitioning to all permanent supportive housing for disabled homeless individuals in lieu of transitional housing programs.

4- The COC has placed a great effort on coordinated care upon discharge from formal systems of care as listed:

Foster Care – Foster children who are aging out of service often need housing support from the local community. The State of North Carolina mandates that the local governmental units administering the foster care program begin preparing foster care children to become self-sufficient prior to age 18. The North Carolina Children’s Policy Review Committee, with the Department of Health and Human Services had developed protocols for Transitional Living Plans for youth being discharged from the foster care systems. Components of these protocols include the requirement that each youth will have a stable place to live upon discharge, with a primary and a backup discharge plan to minimize the likelihood of homelessness resulting from a disrupted plan.

Therefore, it is the policy of COC member agencies that all due diligence should be exercised by the local foster care programs to ensure that persons aging out of the foster care system are not rendered homeless. Through Memoranda of Understanding (MOUs) with local Department of Social Services and the COC, the agreement is not to accept applicants into their federally-funded housing programs for homeless consumers who have become homeless as a direct result of local governmental unit releases from foster care.

Health Care: Because hospitals are independent and do not fall under a state office, it is impossible to develop written formal protocols. However, the local hospitals, with member representation in the local COC, has established protocols to address the need for continuing care, treatment and services after discharge to ensure patients are not discharged to homelessness. Through the combined resources of the hospital emergency social work staff and the non-profit providers appropriate housing is located. The COC members agree that emergency prevention measure shall be taken for appropriate placement so that no person is discharged into a federally-funded homeless program. Additionally, through hospital emergency social work staff, persons receiving emergency room care identified as homeless shall be provided with a list of housing and service resources to address their need for permanent housing.

Mental Health: North Carolina. Administrative Code (10A NCAC 28F .0209) requires that housing discharge planning for individuals in state psychiatric hospital and alcohol and drug abuse treatment centers or anyone remaining in treatment 31 days or more. Formal MOUs have been implemented with state mental health institutions and substance abuse treatment centers and the local COC to ensure strategies to identify appropriate permanent housing for persons being discharged. The local mental health system also maintains a transitional program facility to ensure no one is discharged to homelessness. The transitional program has protocols in place that ensure permanent supportive housing for persons discharged from the program. This program is funded through local, state and other federal resources apart from HUD. Therefore, homeless housing programs within the COC agree they

will not accept persons coming directly from state mental institutions or local mental health transitional programs into HUD Federally funded homeless programs.

Corrections: The COC has developed a written protocol that COC participating agencies who receive HUD McKinney-Vento funds will not accept participants into their program directly from state prisons or local jails. State prisons in NC are not allowed to sign MOUs with local COC's; instead all MOU's must be coordinated with the Department of Corrections (DOC) itself.

AP-75 Barriers to affordable housing - 91.420, 91.220(j)

Introduction

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Discussion

Upon examination of all current documents, policies and other jurisdictional rules, there does not appear to be any public policies that present barriers to affordable housing.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

In order to meet the needs of the underserved residents of the COC area, the entire community must come together to:

- Recruit private citizens that are not targeted stakeholders to take an active participant's role in addressing housing needs at a community level;
- Solicit and develop public/private partnerships to leverage private community dollars that will address the greatest needs of housing;
- Solicit and develop resource availability of private non-profit agencies to work in partnership with the Gastonia Consortium to address the goals of affordable housing;
- Seek possible available funding, grants, partnerships that can be leveraged in order to obtain new dollars into the community;

Actions planned to foster and maintain affordable housing

Action that will continue to further the goals of affordable housing in the area will be:

- The continuation of the promotion of safe, decent affordable housing in the COC area by the Involved public and private agencies and entities;
- Public Housing has a shortage of affordable housing for all eligible populations including; households at or below 30% of AMI, at or below 50% of AMI, units for the elderly, disabled individuals, families with special needs. The COC will undertake a course of action to expand the affordable housing market by the continued development of the Loray Mill Site and the ArtSpace site. These two projects are the most visible and will take a number of years to come to capacity.
- Gastonia Housing Authority may partner with for-profits and not-for-profit developers when possible to provide developments that are awarded Low Income Housing Tax Credits that are developed based on market studies that reflect affordable housing needs in Gaston County.
- The City of Gastonia will continue to attract a diverse range of new investments to establish the center city as a dominant economic, social and cultural center of Gastonia. By the use of self-financing bonds to support infrastructure improvement activities, and other activities related to the re-use of abandoned or vacant facilities, creation of affordable housing, and infill commercial development.
- Encouragement of stable neighborhoods by increasing the number of affordable units that will be available.

According to the American Community Survey (ACS), the subpopulation of cost burdened Hispanic homeowners falls outside of the norms defined by HUD. Developing affordable housing, both rental and homeownership, for this minority population should be considered of high importance. Based on analysis, the populations should be targeted for affordable homeownership using infill lots throughout the city in order to develop mixed incomes within neighborhoods.

Actions planned to reduce lead-based paint hazards

The American Community Survey in 2011 estimated that Gaston County had 33,421 homes potentially impacted by lead based paint. This figure represents approximately 39% of the entire housing stock. For the City of Gastonia, the number of housing units is 13,521 or 43%.

Year Built	Percent With Lead-based Paint
Before 1940	90%
1940-1959	80%
1960-1979	62%
After 1980	N.A.

Source: EPA

In the City of Gastonia the following housing units were built prior to 1980:

Year Constructed	Existing Housing Units	Assumed Rate of Lead-Based Paint	Total Units
Pre 1940	2,746	90%	2,471
1940 to 1959	6,698	80%	5,358
1960 to 1979	9,181	62%	5,692
TOTAL			13,521

Source: ACS

In Gaston County the following housing units were built prior to 1980:

Year Constructed	Existing Housing Units	Assumed Rate of Lead-Based Paint	Total Units
Pre 1940	6,914	90%	6,223
1940 to 1959	15,851	80%	12,681
1960 to 1979	25,012	62%	15,507
TOTAL			33,421

Source: ACS

In the year, July 2011 through June 2012 the Gaston County Health Department had only one reported case of lead poisoning. Since June 2012 the Health Department reports that there have been no reported cases.

Given the above background information, it is the intent that the City of Gastonia continue with the current programs that are in effect. Those programs and services included an "on-call" contract with a professional lead-paint and mold testing firm. The services that are outlined include: testing and major and minor rehabilitation of sites that contain the above mentioned hazards, and asbestos.

The Housing and Neighborhoods Division of the City of Gastonia in partnership with the Gastonia Housing Authority, works to ensure that all public housing choice voucher units, TBRA units and units that are eligible for security deposit assistance are free of lead-hazard paint exposure.

Additionally the following procedures are integrated into housing programs and policies:

1. All adults that attend homebuyer education classes provided through the City of Gastonia's Housing and Neighborhood Division receive a booklet on the hazards of lead-based paint;
2. All homebuyers receive a free inspection of the proposed housing unit to be purchased. The inspection ensures no peeling or chipping paint hazards.
3. Homebuyers requesting rehabilitation or emergency repair receive a booklet on the hazards of lead-based paint;
4. Subrecipients ensure that anyone receiving funds for Tenant-Based Rental Assistance chooses a unit that does not contain lead-based paint hazards as certified by the landlord. These tenants also receive a booklet on the hazards of lead based paint.
5. The City of Gastonia provides area non-profits and the local Health Department with booklets on lead-paint hazards as a community education tool.

Any programs undertaken by the Housing and Neighborhood Division follow the HUD regulations regarding lead based paint and lead safe work practices.

Actions planned to reduce the number of poverty-level families

Employment opportunities are addressed through the development of two projects (Loray Mill and Art Space) that are designed to increase commercial activity and employment.

Actions planned to develop institutional structure

The lead agency responsible for the development of the Gastonia/Gastonia Consortium's Annual Action Plan and Consolidated Plan is the City of Gastonia's Housing and Neighborhoods Division.

As the lead agency in the jurisdiction, the City of Gastonia, through its Housing and Neighborhoods Division, is responsible for implementation of the Annual Action Plan. The Housing and Neighborhoods Division works in partnership with other organizations, partnerships, sub-recipients and contractors. The partnerships currently include:

- Continuum of Care Members (over 50 member organizations)
- Faith based groups (11 members)
- Citizens Advisory Board
- Lenders/Banks
- County/Municipal Entities
- Property Management Companies
- Real Estate firms

Among the agencies is Reinvestment in Communities of Gaston County (RIC) which operates as a CHDO. Additionally, RIC conducts training for staff of various community agencies to help them understand the process of obtaining SSA benefits for homeless individuals who are disabled. Reinvestment in Communities / RIC Management Services is responsible for administering the Tenant-Based Rental Assistance program in Gaston County.

The City of Gastonia partners with Habitat for Humanity of Gaston County to increase the stock of homeownership opportunities for low-income families by providing property and/or site preparation work for new housing construction.

Private for-profit partners include multiple financial institution, contractors and other corporations, as well as public and private community organizations that can contribute to the development of beneficial public resources.

The City and its Housing and Neighborhood Division is constantly conducting outreach to existing and new community resource agencies and individuals so that all facets of the community are represented. Member agencies and partners are encouraged to assist in the development of these resources.

Actions planned to enhance coordination between public and private housing and social service agencies

The City of Gastonia Housing and Neighborhood Division and the COC will continue their efforts to enhance the established inter-agency dialog and communication. These lines of communication will embrace both the public and private sector organizations. On-going means of communication will be in the form of e-mails, conferences and meetings with all entities invited to contribute.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
\$0

2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan
\$0

3. The amount of surplus funds from urban renewal settlements
\$0

4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
\$0

5. The amount of income from float-funded activities
\$0

Total Program Income
\$0

Other CDBG Requirements

1. The amount of urgent need activities

Public Service Recipients	\$5,000
Homeless Technical Assistance	\$35,000
HOPE 4 Gaston	\$10,000

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

Discussion

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

Community Development

The City is progressing with two projects that include affordable housing and employment opportunities. These projects have received funding from several State and local sources including:

Loray Mill:

- Preservation North Carolina (non-profit organization)
- City of Gastonia (infrastructure and other funding)
- FHA loan
- Private Developers

Artspace:

- City of Gastonia (infrastructure and other funding)
- North Carolina Governor's Highway Safety Program
- Private Developers

Housing

- City of Gastonia (providing office space and support to RIC)
- United Way
- CoC member agencies
- Habitat for Humanity

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

Resale/Recapture:

The City of Gastonia utilizes HOME Partnership funds for homebuyer activities. The City must be in compliance with the resale/recapture provisions found in 24 CFR 92.254. The City incorporates the resale provisions in 24 CFR 92.254(a)(5)(i) when providing HOME funds in the form of a development subsidy to a subrecipient/developer of homebuyer affordable single family projects. The City chooses to comply with the recapture requirements found in 24 CFR 92.254(a)(5)(ii) when providing downpayment and closing costs assistance for the Downpayment Assistance Program.

Direct HOME subsidy means the amount of HOME assistance including any program income that enabled the homebuyer to buy the unit. The direct HOME subsidy includes downpayment, closing costs, interest subsidies, or other HOME assistance provided directly to the homeowner.

Income-eligible person or family shall mean a person or family having an income at 50% to 80% of Area Median Income (AMI) according to the Charlotte-Gastonia- Rock Hill Metropolitan Area HUD Income Limits for family size.

Net Proceeds means the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

Original Investment means funds provided by the Original Homebuyer for the purchase of the Property.

Original Purchaser means the person or family to whom Subrecipient/Developer conveys the property after construction. The term shall not include any subsequent purchaser.

Resale Provisions:

In accordance with the applicable homebuyer resale provision outlined in 24 CFR Part 92.254(a)(5)(i), the City of Gastonia has adopted the resale provision for its HOME-assisted homeownership housing when a development subsidy is provided to a subrecipient/developer and there is no direct subsidy to the homebuyer.

The Agreement provides, among other things, for the City to provide one or more grants to the Subrecipient to construct improvements on the Property. The source of funding for said grant is a grant to the City from the United States Department of Housing and Urban Development (hereinafter "HUD") under the HOME Investments Partnership Program as set forth in 24 C.F.R. Part 92 (hereinafter "HOME Program"). The HOME program requires that the affordability of properties receiving subsidies from the program be preserved.

The Agreement further provides that as a condition of making said grants, the Subrecipient has agreed to restrict the property as follows to meet the requirement of the HOME Program.

Covenants, Restrictions and Requirements

The Subrecipient hereby represents, covenants, warrants and agrees that if the Property is sold during the Period of Affordability, such Property shall be sold to and occupied as the principal residence of an Income-eligible Person or Family as prescribed by and in compliance with 24 C.F.R. Section 92.254, as the same may be amended or replaced from time to time. The determination of whether a purchaser is income-eligible shall be determined as of the date the property is conveyed to such purchaser. the Original Purchaser sells the Property during the Period of Affordability, the Original Purchaser shall be entitled to receive a fair return on investment, which shall be established by determining the amount of Original Purchaser's Original Investment plus any Capital Improvements made by the Original Purchaser and multiplying that amount by average annual percentage change in the Consumer Price Index — All Urban Consumers (CPI-U) for the South Region (base period-1982-84=100) between the date of conveyance to the Original Purchaser and the date of sale by the Original Purchaser to a subsequent purchaser. The amount of direct HOME subsidy to be repaid shall be determined by dividing the amount of assistance by the number of years that remaining in the affordability period. The Original Purchaser will not be required to pay an amount greater than the net proceeds from the sale.

The Original Purchaser will consult with the City before making Capital Improvements to the property.

If the Original Purchaser does not continue to occupy the Property as the principal residence, the Original Purchaser will be responsible for repaying the full amount of HOME investment in a lump sum immediately. The written agreement with the homebuyer should state "the homebuyer agrees to provide staff with a written certificate of residence status each year or allow staff to verify principle residence status annually. Subletting or renting is not permitted."

This Declaration is made for the benefit of the City and HUD, and confers upon the City, HUD, and their respective successors and assigns the right, without limitations to enforce the provisions of this Declaration. This Declaration shall not be amended, revised, or terminated except by a written instrument, without the prior written consent of the City and HUD and any such amendment shall be duly recorded in the office of the Register of Deeds for Gaston County, North Carolina.

The covenants, reservations, and restrictions set forth herein shall be deemed covenants running with the land and, except as provided in Paragraph 1 hereof, shall pass to and be binding upon the Subrecipient's heirs, assigns and successors in title to the Property or any Property or any part thereof; provided, however, that upon the termination of this Declaration in accordance with the terms hereof, said covenants, reservations, and restrictions shall automatically expire. Each and every contract, deed or other instrument hereafter executed covering or conveying the Property or any portion thereof shall conclusively be held to have been executed, delivered, and accepted subject to the covenants, reservations, and restrictions set forth herein whether or not said covenants, reservations, and restrictions are set forth in such contract, deed, or other instruments. If a portion or portions of the Property are conveyed, all of such covenants, reservations, and restrictions shall run with and apply to each and every portion of the Property.

If a violation of any of the provisions hereof occurs or is threatened, the City and its successors and assigns may institute and prosecute any proceeding at law or in equity to abate, prevent, or enjoin any such violation or threatened violation, to compel specific performance hereunder, or to recover monetary damages caused by such violation or threatened violation. The provisions hereof are imposed upon and made applicable to the Land and shall run with the Land and shall be enforceable against the Owner or any other person or entity that has or shall have an ownership interest in any residential unit included in the Development at the time of such violation or threatened violation. No delay in enforcing any provision hereof as to any breach or violation shall impair, damage, or waive the right of any party entitled to enforce the provisions hereof or to obtain relief against or recover for the continuation or repetition of such breach or violation or any similar breach or violation hereof at any later time or times.

If any provision hereof shall be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining portions hereof shall not in any way be affected or impaired thereby.

Recapture Provisions:

In accordance with the applicable homebuyer recapture provision outlined in 24 CFR Part 92.254(a)(5)(ii), the City of Gastonia has adopted the recapture provision for its HOME-assisted Homebuyer Assistance Program from net sales proceeds on a pro-rated basis when the original homebuyer sells the property during the affordability period. Net proceeds are the funds remaining from the sale of the property by the original homebuyer less the repayment of the outstanding balance on any superior mortgage and any closing costs. To the extent that net proceeds are available at closing, all or a portion of the HOME funds are due and payable.

All homeowner assistance funds shall be provided as a forgiven loan amortized over the affordability period as evidenced by a note secured by a deed of trust on the property and a legally adopted.

The entire amount of the HOME homeowner assistance funds shall be due and payable, if the homebuyer does not continue to occupy the property as their principal residence for the duration of the period of affordability. The written agreement with the homebuyer should state "the homebuyer agrees to provide staff with a written certificate of residence status each year or allow staff to verify principle residence status annually. Subletting or renting is not permitted."

In the event of foreclosure, the Lender or the City may not require the Borrower to repay an amount greater than the net proceeds available after the foreclosure sale.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Period of Affordability means the period which begins on the date the project is closed out in IDIS with a qualified beneficiary and ends on the date after the number of years prescribed in the chart found in 24 CFR 92.253(a)(4).

To determine the pro rata amount recaptured by the City:

- Divide the number of years the homebuyer occupied the home by the period of affordability,
- Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

All development subsidy funds shall be provided as a grant to the subrecipient/developer over the affordability period as evidenced by a note secured by a deed of trust on the property and in legally adopted written agreement.

The Period of Affordability and the provisions of this Declaration shall be suspended upon foreclosure by a lender or other transfer in lieu of foreclosure, if such foreclosure or transfer recognizes any contractual or legal rights of the City or other eligible persons to take actions that would avoid the termination of low-income affordability. If, however, at any time thereafter during the Period of Affordability the owner of record prior to such foreclosure or transfer in lieu of foreclosure or any entity that includes the former owner or those with whom the former owner has family or business ties, obtains an ownership interest in the Property, then the Period of Affordability and provisions of this declaration shall be revived according to their original terms.

The Subrecipient represents, covenants and warrants that at all times during the Period of Affordability, the Property shall qualify and be maintained as affordable housing as prescribed in the applicable HOME Program regulations (24 C.F.R. Part 92, as it may be amended). The City will offer downpayment assistance to the subsequent buyer and the homeownership provision will continue and the City will continue to evaluate subsequent buyers to insure they are income eligible.

Upon expiration of the Period of Affordability, this Declaration shall automatically terminate and be of no further force and effect. The Subrecipient may, with the prior written consent of the City, record with the Gaston County Register of Deeds a written instrument further evidencing the termination of this Declaration.

The period of affordability shall be determined by the recapture schedule below, established in accordance with 24 CFR 92.253 (a)(4):

HOME Funds	Period of Affordability
Less than \$15,000	5 Years
\$15,000 - \$40,000	10 Years
More than \$40,000	15 Years

Refinance: During the period of affordability, the homebuyer shall only be permitted to refinance the property with prior approval by the City.

If the Original Purchaser sells the Property during the Period of Affordability, the amount of direct HOME subsidy funds to be repaid shall be determined by dividing the amount of assistance by the number of years that are remaining in the affordability period. The Original Purchaser will not be required to pay an amount greater than the net proceeds from the sale.

The affordability period shall be suspended, if an ownership interest is terminated during the period of affordability by foreclosure, transfer in lieu of foreclosure, or assignment of a FHA-insured mortgage to HUD. If the owner thereafter obtained a redemptive interest in the property, the original affordability period resumes and continues until its term expires.

Upon expiration of the Period of Affordability, this Declaration shall automatically terminate and be of no further force and effect. The Subrecipient may, with the prior written consent of the City, record with the Gaston County Register of Deeds a written instrument further evidencing the termination of this Declaration.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

None

