Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Gastonia's 2020-2024 Five-Year Consolidated Plan is a comprehensive planning document outlining a coordinated approach to housing and community development needs using U.S. Department of Housing and Urban Development (HUD) grant funds. It provides guidance on the investment of HUD dollars and outlines priorities for using the City's Community Development Block Grant (CDBG) funds and the Gastonia Consortium's HOME Investment Partnerships (HOME) funds over the next five years. The CDBG program operates within the Gastonia city limits, while the Consortium's HOME program operates throughout Gaston County, excluding Spencer Mountain and High Shoals and including Kings Mountain.

Every year, the City will produce an Annual Action Plan to detail specific activities to carry out the Five-Year Consolidated Plan's priorities and goals. Gastonia's 2020 Annual Action Plan is included with this Consolidated Plan.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Priority needs were developed based on community participation and stakeholder consultation and analysis of top housing, homeless, special needs, and non-housing community development needs in the City of Gastonia and the Gastonia Consortium. They include:

Develop, Acquire, or Preserve Affordable Housing

- Support development or rehabilitation/preservation of rental housing affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County.
- Support development of for-sale housing units affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County.
- Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs.

Homebuyer Assistance

- Provide homebuyer preparation and financial management classes to increase the number of low- and moderate-income households positioned to purchase homes.
- Increase the number of first-time home buyers through down payment and closing cost assistance.

Rental Assistance

- Working with community partners, assist income-eligible renter households with tenant-based rental assistance.
- Collaborate with agencies in the Continuum of Care (CoC) and others to assist households at-risk
 of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other
 assistance.

Housing and Supportive Services for People Experiencing Homelessness

- Collaborate with agencies in the CoC and others to assist people who are homeless through
 provision of and access to emergency, transitional, and permanent housing to enable them to
 move to appropriate housing and achieve greater stability.
- Collaborate with agencies in the CoC and others to provide access to coordinated support services and case management for people experiencing homelessness.

Public Improvements and Neighborhood Revitalization

- Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, recreation centers, and parks in income-eligible areas.
- Assist community service organizations in improving their physical structures to meet goals for serving low- and moderate-income households, people who are homeless, and other special needs populations.
- Clear, demolish, or remediate structures to prevent blight in low- and moderate-income areas.

Fair Housing Education and Enforcement

- Conduct fair housing education efforts targeted to members of the public, including those most vulnerable to housing discrimination, and housing professionals, specifically including independent landlords.
- Continue the City of Gastonia's fair housing hotline and raise awareness about the City of Gastonia Fair Housing Officer.
- Consider fair housing testing targeted toward identifying rental market discrimination.

Program Administration

• Program administration costs related to planning and execution of community development, housing, and homelessness activities funded through the CDBG and HOME programs.

3. Evaluation of past performance

Each year, the City of Gastonia reports its progress in meeting its five-year and annual goals by preparing a Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is submitted to HUD within 90 days of the start of the new program year. Copies of recent CAPERs are available for review at Gastonia's Housing and Neighborhoods Department or online at https://www.cityofgastonia.com/hud-reporting.html.

4. Summary of citizen participation process and consultation process

The City of Gastonia conducted significant consultation with residents, city staff, Citizens Advisory Board members, government agencies, nonprofit agencies, housing and homeless service providers, and others to develop this Five-Year Consolidated Plan. The City held a public meeting and four focus groups, interviewed key stakeholders, and surveyed the public about local housing and community development needs. Together nearly 200 people provided input for the Plan. This input is summarized in the Citizen Participation and Needs Assessment sections of this document. Community input was also used to determine needs and priorities. Public comments on the draft Consolidated Plan and Annual Action Plan will be received throughout a 30-day public comment period during May and June, 2020.

5. Summary of public comments

Comments received through the public meeting, focus groups, community survey, and one-on-one interviews are summarized in the Citizen Participation section of this Plan and incorporated in individual sections as relevant.

6. Summary of comments or views not accepted and the reasons for not accepting them

The City took all comments into consideration in preparing this Consolidated Plan and Annual Action Plan. The City reviewed all comments for common and recurring themes to help establish goals and priorities. No comments or views were not accepted.

7. Summary

This five-year plan identifies the community's affordable housing, homeless, and community development needs, as well as outlines a comprehensive and coordinated strategy for implementation of programs. The City will use CDBG and HOME funding to leverage other public and private investment in order to address its goals and priorities.

The Process

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Gastonia	Housing and Neighborhoods
		Division
HOME Administrator	Gastonia	Housing and Neighborhoods
		Division

Table 1 - Responsible Agencies

Narrative

The City of Gastonia's Housing and Neighborhoods Division is the lead agency responsible for developing the 2020-2024 Consolidated Plan and 2020 Annual Action Plan. These plans prioritize community development and affordable housing needs and establish goals for the use of HUD grant funding through the City of Gastonia's Community Development Block Grant (CDBG) program and the Gastonia Consortium's HOME Investment Partnerships (HOME) program.

The Housing and Neighborhoods Division also administers the CDBG and HOME programs, including planning, implementation, coordination with partner organizations, monitoring project progress, and reporting on performance to the City Council and HUD. The CDBG program operates within the Gastonia city limits, while the Consortium's HOME program operates throughout Gaston County, excluding Spencer Mountain and High Shoals and including Kings Mountain.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

The City of Gastonia utilized a robust public engagement process to develop its 2020-2024 Five-Year Consolidated Plan. Prior to preparing the draft plans, the City engaged residents and stakeholders through a community meeting, a meeting with the city's Citizen's Advisory Board, four focus groups focused on engaging specific stakeholder groups, interviews with key stakeholders, and a public survey. A total of 132 people in participated in the survey. Results of these outreach efforts are summarized in the Community Participation section of this Plan.

The City of Gastonia will hold a 30-day public comment period and a public hearing to receive input from residents and stakeholders on the draft Consolidated Plan prior to approval by the City Council and submission to HUD.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

In conducting its community engagement process, the City strove to engage with housing providers and health, mental health, and other service agencies. Stakeholders were invited to attend a public meeting, participate in individual interviews or focus groups, and/or take the public survey on housing and community needs. These stakeholders included residents, city elected officials and staff, members of the Citizens Advisory Board, housing developers, nonprofit organizations, homeless housing and service providers, people experiencing homelessness, mental health service providers, mortgage lenders, realtors, participants in City of Gastonia programs, and others.

The City works closely with public and private sector providers to ensure delivery of services to residents and to promote interagency communication and planning. The City works with various housing, health, mental health, and service agencies to gather data and identify gaps in services.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City of Gastonia falls within the Gaston Lincoln Cleveland Continuum of Care. The Continuum of Care promotes community-wide commitment to ending homelessness; funds nonprofit providers and State and local governments to quickly rehouse homeless individuals and families, promotes access to and utilization of mainstream programs by homeless individuals and families, and supports self-sufficiency among individuals and families experiencing homelessness. While the City of Gastonia does

not receive ESG funding, organizations that meet the needs of homeless populations within the City receive CDBG funding.

For this Consolidated Plan, the City engaged with several organizations that serve residents who are homeless or at-risk residents to better understand the needs of the clients they serve. The planning team conducted focus groups with members of the Gaston Lincoln Cleveland Continuum of Care and residents of the Salvation Army Emergency Shelter.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Gastonia is part of the Gaston Lincoln Cleveland Continuum of Care. As such, the City is represented in the decision making for ESG, the competitive Notice of Funding Availability (NOFA) for the Continuum of Care, and other homelessness funds and helps to oversee the management of those funds, including developing performance standards, monitoring, evaluating outcomes, and administering HMIS. The Homeless Management Information System (HMIS) Lead for the Continuum of Care conducts the Point in Time count and manages data around homelessness. The Continuum of Care utilizes an Emergency Response Survey Tool and Vulnerability Index-Service Prioritization Decision Tool to assess individuals and families' resources, supports, and vulnerability.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Citizens Advisory Board
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market Analysis Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting
2	Agency/Group/Organization	Gastonia City Council
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market Analysis Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
3	Agency/Group/Organization	Gaston Lincoln Cleveland Continuum of Care
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Focus group

4	Agency/Group/Organization	Gaston County Department of Social Services
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
5	Agency/Group/Organization	Gaston County Workforce Development Board
	Agency/Group/Organization Type	Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Market Analysis Anti-poverty Strategy Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
6	Agency/Group/Organization	Gaston Regional Chamber
	Agency/Group/Organization Type	Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Anti-poverty Strategy Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
7	Agency/Group/Organization	SALVATION ARMY GASTONIA
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Focus group
	the anticipated outcomes of the consultation or areas for improved coordination?	
8	Agency/Group/Organization	Habitat for Humanity of Gaston County
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder interview
9	Agency/Group/Organization	REINVESTMENT IN COMMUNITIES OF GASTON COUNTY, INC.
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Focus group

Identify any Agency Types not consulted and provide rationale for not consulting

Efforts were made to consult as broad a group of community stakeholders as possible. Flyers regarding the planning process were emailed to individuals on City-held contact lists, who were also asked to share the information about the project with their networks. Flyers asked residents and stakeholders to participate by attending a public meeting or by completing an online survey. Additionally, stakeholders from government, nonprofit, and other organizations and agencies were emailed and asked to participate in an in-person or phone interview. No agency types were excluded from participation.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		
Gastonia 2025	City of Gastonia	Goals that overlap with the goals of this plan include:-
Comprehensive		Ensure a variety of housing opportunities and choices for all
Plan: Our Place in		income levelsProvide park and recreation facilities to meet
the		the needs of a diverse population at accessible locations
		throughout the City.
Gaston Tomorrow:	Gaston County	Goals that overlap with the goals of this plan include:-
Gaston County 2035		Continue to create mixed-use developments where
Comprehensive		appropriate to support towns and other destinations in the
		CountyEmphasize the already established recreational
		amenities and encourage new recreational amenities as
		appropriate.
Prosperity for	Centralina	Goals that overlap with the goals of this plan include:-Assess
Greater Charlotte:	Economic	current and future housing availability and its alignment
Comprehensive Ec	Development	with future growth and employment patternsAssess
	Commission	housing affordability near employment centers and existing
		infrastructureAdvocate for continued investment in
		regional amenitiesProvide technical assistance to cities,
		towns and counties developing greenways, trails, pedestrian
		plans and recreational venuesPromote better access to
		outdoor spaces for seniors and increased ADA compliance.
Analysis of	City of Gastonia	Goals that overlap with the goals of this plan include: -
Impediments to Fair		Continue using HOME and CDBG funds to increase and
Housing Choice (20		maintain availability of affordable housing, including to
		support homebuyer education and assistanceIdentify
		place-based strategies focused on improving physical and
		other resources in specific areasDesign and deliver fair
		housing education programs for the public and housing
		industry professionals.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

As the City of Gastonia implements this Five-Year Consolidated Plan, it will continue to work with other public entities, including regional organizations and the state of North Carolina. Several public agencies provided input during the development of this Plan, including the city's Citizen's Advisory Board,

Gastonia City Council members, Gaston County Department of Social Services, Gaston County Workforce Development Board, and participants in City of Gastonia programs.

Narrative

PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Residents of the City of Gastonia were invited to provide input for this Consolidated Plan by attending a public meeting or by taking a community-wide survey. A Housing and Community Needs Survey was available to residents via a weblink and in hard copy. Paper copies of the survey were available at the public meeting and through the Housing and Neighborhoods Department. The survey was available from December 1, 2019, to February 14, 2020, and a total of 132 responses were received.

A public meeting was held on Tuesday, December 10, 2019, at 6 p.m. at Friendship Christian Church in Gastonia. Advertisements for the public meeting and survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Notice was given to residents through advertisements placed in *The Gaston Gazette*, and through flyers placed in public places and distributed to the City's network of nonprofit service providers. Flyers were emailed to local housing and service providers and community development practitioners, both as outreach to these stakeholders and for distribution to their clients. An additional meeting was held with the city's Citizen's Advisory Board on Monday, December 9, 2019 at 6 p.m. in the Garland Municipal Building in Gastonia.

In addition to these meetings, in-depth individual interviews and focus groups were conducted with key stakeholders and groups representing a variety of viewpoints relevant to the development of the Consolidated Plan. Invitations for individual interviews were extended to more than 15 representatives, and seven participated in interviews. Further, four focus groups were designed to provide in-depth engagement with 1) nonprofit staff and members of the Continuum of Care, 2) realtors and mortgage brokers, 3) residents at the Salvation Army emergency shelter, and 4) participants in the City's homeownership education program.

The City of Gastonia will hold a 30-day public comment period to receive comments on the draft 2020-2024 Consolidated Plan and 2020 Annual Action Plan in early 2020. During this time, copies of the draft report will be available for public inspection and residents and stakeholders can provide written comments. A public hearing to present key findings and receive comments will also be held.

A summary of community outreach efforts and responses is shown below, with complete survey results and evidence of outreach materials available as an appendix.

Citizen Participation Outreach

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of comment	URL (If
r	h	h	response/attendanc	comments received	s not accepted	applicable
			е		and reasons)

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments received	Summary of comment s not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities	15 attendees	Housing and Homeless	None	-
				CommentsNeed for rental		
		Persons with		housing affordable to		
		disabilities		people with low		
				incomesThere is a need for		
		Non-		homeowner housing		
		targeted/broad		rehabilitationClients		
		community		experience difficulty using		
				Housing Choice		
		Residents of		VouchersLandlords have		
		Public and		no motive to work with		
		Assisted Housing		people who are		
				challengedIt is difficult for		
		Housing and		people experiencing		
		service providers,		homelessness to get		
		community		placed in housing because		
		development		of a lack of affordabilityA		
		practitioners		fund for landlords for		
				taking on riskier renters is		
				a possibilityGentrification		
				is contributing to		
				homelessnessHomelessnes		
				s is an epidemic and fewer		
				supports are in placeNeed		
				place for homeless		
				individuals to go to shower		
				and get mailCDBG		
				program is not sufficient		
	Consolidated	Plan	Gastonia	funding to address	16	
OMB Control No:	2506-0117 (exp. 06/30/2018	3)		homelessnessAll strategies		
				are needed to address the		
				problem of homelessness		

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments received	Summary of comment s not accepted and reasons	URL (If applicable)
2	Citizens Advisory	Citizens Advisory	12 attendees	Housing and Homeless	None	-
	Board Meeting	Board members		NeedsMixed-income		
				housingEmergency rental		
				assistance in the face of a		
				job loss, medical issue, or		
				other emergency situation		
				where short-term help is		
				neededProtection from		
				rent increases / potential		
				gentrification for existing		
				renters and homeowners		
				in FUSE areaTransitional		
				housingDay shelter and		
				one-stop-shop accessible		
				via bus for people who are		
				homeless to access		
				services, job search		
				assistance, mailing		
				address, food, shower		
				facilities, etc. Continue		
				down payment assistance		
				/ 1st time homebuyers		
				programsContinue home		
				rehab program for		
				homeownersContinue		
				constructing new homes		
				for homeownership;		
				possible land acquisition		
	Consolidated	Plan	Gastonia	for new	17	
OMB Control No:	2506-0117 (exp. 06/30/2018	3)		constructionCommunity		
				Development NeedsAdult		
				education and job training		

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments received	Summary of comment s not accepted and reasons	URL (If applicable)
3	Citizens Advisory	Continuum of	12 attendees	Housing and Homeless	None	-
	Board Meeting	Care members,		NeedsMore housing		
		Nonprofit agency		supply / affordable		
		staff		housing, possibly upfitting		
				older, affordable homes or		
				developing tiny		
				homes/cottagesMixed-		
				use, mixed-income		
				housing (ex: Renaissance		
				West in		
				Charlotte)Sustainable		
				affordable rental		
				housingAll types of		
				housing for people who		
				are homeless, emergency		
				housing, transitional		
				housing, and permanent		
				supportive housing		
				accessible to transit and		
				located throughout the		
				cityHousing is a barrier for		
				family reunification by		
				foster care system		
				Permanent supportive		
				housing for substance		
				abuse recoveryNeeds to		
				be a conversation about		
				shelters within city		
	Consolidated	Plan	Gastonia	limitsHousing and other	18	
OMB Control No:	2506-0117 (exp. 06/30/2018)		resources for people who		
				are homeless but do not		
				fall into specific groups		

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of comment	URL (If
r	h	h	response/attendanc	comments received	s not accepted	applicable
			e		and reasons)
4	Citizens Advisory	Residents of	6 attendees	Housing and Homeless	None	
	Board Meeting	Salvation Army		CommentsEvictions		
		Emergency		prevent people from		
		Shelter		accessing housingThere is		
				no help for people at		
				Salvation Army if you dont		
				have small children or		
				mental health issuesThere		
				is a lack of assistance for		
				single peopleThere is a		
				lack of connections		
				between services;		
				Salvation Army is not able		
				to connect people with		
				housingLack of		
				wraparound		
				servicesUnited Way 211 is		
				focused on hurricane		
				reliefNeed for		
				transportation support for		
				people without bus tickets		
				to be able to hunt for jobs		
				and housingNeed for		
				affordable day care while		
				at shelters and		
				afterAffordable housing		
				would be housing based		
				on ones incomeRental		
	Consolidated	Plan	Gastonia	housing at the \$650-800	19	
OMB Control No:	2506-0117 (exp. 06/30/2018			level is in poor condition;		
	(2.10.00,00,2010			housing at \$1,000 and up		
				also not in good		

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments received	Summary of comment s not accepted and reasons	URL (If applicable)
5	Citizens Advisory	City of Gastonia	3 attendees	Housing CommentsOften	None	-
	Board Meeting	Home Buyerâ¿¿s		homes priced at affordable		
		Club participants		levels have underlying		
				issuesNeed for people to		
				be connected with high-		
				quality		
				realtors/lendersNeed for		
				more case managers to		
				help guide people through		
				the homeownership		
				processNeed to educate		
				people on savingNeed for		
				soft skills programs and		
				connecting people to		
				jobsThe Family Self		
				Sufficiency (FSS) program		
				provided people with		
				money for home		
				purchaseIn combination		
				with down payment		
				assistance and loans,		
				mortgages are less than		
				participants previous		
				rentsCommunity Partners		
				Loan Pool provides loans		
				up to \$30,000 and helps		
				homebuyers avoid private		
				mortgage insuranceIts a		
	Consolidated	Plan	Gastonia	sellers marketNeed for	20	
OMB Control No:	2506-0117 (exp. 06/30/2018	3)		subsidized		
				homeownership through		
				housing authorityNeed for		
				l		

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of comment	URL (If
r	h	h	response/attendanc	comments received	s not accepted	applicable
	Citi and Adding	Deal salate as a sta	e	11	and reasons)
6	Citizens Advisory	Real estate agents	10 participants	Housing	None	
	Board Meeting	Mortgage brokers		CommentsHousing supply		
		and other lenders		in an affordable range for		
				low/mod homebuyers		
				(\$50,000-\$150,000) with		
				possible FHA financing is		
				very limitedMany homes		
				in an affordable price		
				range require repair /		
				rehab, some are being sold		
				with no repairs to be done		
				by sellerLenders require		
				repairs be made before		
				closing; City of Gastonia		
				DPA program requires		
				minimum safety / no code		
				violationsFirst time		
				homebuyers are		
				competing with investors;		
				agents may not want to		
				entertain options with any		
				assistance (VA, FHA,		
				etc.)Big need for education		
				regarding appraisals in the		
				DPA program and other		
				assistance programsNeed		
				to consider what loan		
				payments people can live		
	Consolidated	Plan	Gastonia	comfortably with versus	21	
OMB Control No	2506-0117 (exp. 06/30/2018			most they can be qualified		
2	311. (c.p. 35, 36, 2010	,		forSome lenders have		
				developed alternative loan		

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of comment	URL (If
r	h	h	response/attendanc	comments received	s not accepted	applicable
_			e		and reasons)
7	Citizens Advisory	Housing and	7 interviewees	Housing and Homeless	None	
	Board Meeting	service providers,		NeedsAffordable housing		
		community		is #1 issue; existing		
		development		homeownership programs		
		practitioners		should be continued and		
				used in more locations		
				throughout the cityHomes		
				for sale between \$50,000		
				and \$100,000Required		
				affordable housing		
				component for new		
				developmentsMix of new		
				housing development (for		
				sale and for rent), rehab,		
				and down payment/rental		
				assistanceRehab		
				loansCredit issues and		
				criminal backgrounds are		
				barriers to housing for		
				many low / moderate		
				income		
				householdsHousing that		
				accepts housing choice		
				vouchers; new housing,		
				including housing built by		
				CHDOs, should accept		
				vouchersCity relationships		
				with landlords to support		
	Consolidated	Plan	Gastonia	voucher acceptanceA	22	
OMB Control No:	2506-0117 (exp. 06/30/2018	3)		program that provides		
	(3 p 33, 33, 232			landlords with assurances		
				re: rent payment and		

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of comment	URL (If
r	h	h	response/attendanc	comments received	s not accepted	applicable
			е		and reasons)
8	Citizens Advisory	Minorities	132 respondents	Housing and Homeless	None	
	Board Meeting			NeedsHomelessness		
		Persons with		preventionTransitional and		
		disabilities		supportive housing		
				programsOutreach to		
		Non-		people who are		
		targeted/broad		homelessPermanent		
		community		housingDay center for		
				people who are		
		Residents of		homelessRehabilitation of		
		Public and		affordable rental housing /		
		Assisted Housing		apartmentsSenior		
				housingHomeless		
		Housing and		sheltersEnergy efficiency		
		service providers,		improvements to		
		community		housingHousing for people		
		development		with disabilitiesCommunity		
		practitioners, LEP		Development NeedsHealth		
		population		and mental health		
				servicesSubstance abuse /		
				crime awareness		
				Incentives for creating		
				jobsAbused and neglected		
				children servicesSenior		
				servicesYouth		
				servicesDomestic violence		
				servicesEmployment		
				trainingServices for people		
	Consolidated	Plan	Gastonia	with disabilities	23	



Needs Assessment

NA-05 Overview

Needs Assessment Overview

To inform development of priorities and goals over the next five years, this section of the Consolidated Plan discusses housing, community development, and economic development needs in Gastonia and the Gastonia HOME Consortium. It relies on data from the U.S. Census, the 2011-2015 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted housing is included. Finally, public input gathered through interviews, focus groups, meetings, and the community survey are coupled with previous planning efforts to identify priority public infrastructure, public facility, and public service needs in Gastonia.

Note that sections NA-10 through NA-35 examine housing-related data for the Gastonia Consortium geography, which covers Gaston County, excluding Spencer Mountain and High Shoals and including Kings Mountain. HOME funds administered by Gastonia may be spent anywhere within the Consortium. Sections NA-40 through NA-50 are focused on community development and homeless needs in the city of Gastonia, where CDBG funds may be spent.

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c) Summary of Housing Needs

According to the 2011-2015 5-Year American Community Survey, the Gastonia Consortium is comprised of 218,789 residents and 82,529 households. The Gastonia Consortium experienced population growth of 8% between 2000 and the 2013 5-Year ACS estimates. The number of households expanded at a similar clip of 7% during the same time period. The population within the city of Gastonia experienced growth at a slower rate of 2%, however, the number of households declined by 1% since 2000.

Median household income in the Gastonia Consortium is estimated at \$42,429; higher than the median of \$40,432 in the city of Gastonia. Median household income in the Gastonia Consortium increased by only 1% between 2000 and 2013. Median household income in the city of Gastonia increased by 4% slightly outpacing the Consortium, however, both figures lag significantly behind the 36.4% rate of inflation over the same interval.

Table 6 segments households by income and household type, including small families (2-4 members), large families (5 or more members), households with seniors, and households with young children. As shown, 44,850 households in the Gastonia Consortium have low or moderate incomes (under 80% of HUD Adjusted Median Family Income (HAMFI)), and together constitute over half (54%) of all households in the consortium. Small family households comprise the largest portion (37%) of households with low or moderate incomes followed by households with at least one senior between the ages of 62 and 74 (23%) and (17%). Close to three-quarters of households with at least one senior over the age of 75 and nearly two-thirds of households with young children have low or moderate incomes. With the exception of small family households, low- or moderate-income households comprise the majority of all households in each of their respective household type subgroups.

For many low- and moderate-income households in the Gastonia Consortium, finding and maintaining suitable housing at an affordable cost is a challenge. Tables 7 through 12 identify housing needs by tenure based on Comprehensive Housing Affordability Strategy (CHAS) data. CHAS data is a special tabulation of the U.S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This special dataset provides counts of the number of households that fit certain combinations of HUD-specified housing needs, HUD-defined income limits (primarily 30, 50, and 80% of HAMFI), and household types of particular interest to planners and policy makers.

To assess affordability and other types of housing needs, HUD defines four housing problems:

- 1. Cost burden: A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- 2. Overcrowding: A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.

- 3. Lack of complete kitchen facilities: A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
- 4. Lack of complete plumbing facilities: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	0	218,789	
Households	0	82,529	
Median Income	\$0.00	\$0.00	

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Table 7 indicates a total of 26,605 households, approximately 32% of all households in the Gastonia Consortium, experience one of the listed housing problems. Data for households experiencing severe housing problems provided in Table 8 show 16% of all households (13,276 households) experience one or more severe housing problems listed.

Housing cost burden is the most common housing problem in the Gastonia Consortium among both renter and owner households. Nearly half (48%) of all households with incomes under 80% HAMFI (HUD adjusted median family income) in the county experience cost burdens. Severe cost burdens affect 4,359 owners and 5,948 renters, or 23% of all households with incomes under 80% HAMFI. For the lowest income households (those with incomes under 30% HAMFI), severe cost burdens are most common, impacting 7,559 of the 14,520 households (52%) at that income level; an additional 2,201 households have a cost burden.

While the primary housing issue facing low- and moderate-income residents are related to affordability, there are other housing needs in the city. Approximately 3% of all households experience overcrowding (or are doubled up) while 2% of all households have zero or negative (no) income. Less than 1% of all households reside in substandard housing or lack complete plumbing and kitchen facilities. Although these percentages pale in comparison to households with cost burdens, the total number of households experiencing problems other than cost burdens amounts to 4,131 or 5% of all households in the Gastonia Consortium.

Outside these four HUD-defined housing problems, other important needs in the consortium are rehabilitation of affordable housing units, senior housing, homelessness prevention services, and transitional and supportive housing programs.

The remainder of this section characterizes local housing needs in more detail. The Market Analysis component of the Consolidated Plan identifies resources available to respond to these needs (public housing, tax credit and other subsidized properties, housing and services for the homeless, and others).

Number of Households Table

	0-30%	>30-50%	>50-80%	>80-100%	>100%
	HAMFI	HAMFI	HAMFI	HAMFI	HAMFI
Total Households	14,520	13,800	16,530	8,040	29,615
Small Family Households	4,915	5,054	6,575	3,475	17,335
Large Family Households	929	762	1,554	804	2,150
Household contains at least one					
person 62-74 years of age	2,797	3,278	4,392	1,926	5,923
Household contains at least one					
person age 75 or older	2,036	2,401	2,017	723	1,798
Households with one or more					
children 6 years old or younger	2,703	2,003	2,897	1,184	3,034

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

			Renter					Owner		
	0-30%	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	AMI	50% AMI	80% AMI	100% AMI		AMI	50% AMI	80% AMI	100% AMI	
NUMBER OF HOU	ISEHOI DS		AIVII	AIVII			AIVII	AIVII	AIVII	
Substandard	32110203	,								
Housing -										
Lacking										
complete										
plumbing or										
kitchen facilities	149	194	134	0	477	22	69	30	10	131
Severely										
Overcrowded -										
With >1.51										
people per										
room (and										
complete										
kitchen and										
plumbing)	628	159	275	125	1,187	34	45	53	10	142
Overcrowded -										
With 1.01-1.5										
people per										
room (and none										
of the above										
problems)	114	164	208	34	520	90	89	195	32	406
Housing cost										
burden greater										
than 50% of										
income (and										
none of the										
above										
problems)	5,060	793	95	24	5,972	2,499	1,413	447	59	4,418
Housing cost										
burden greater										
than 30% of										
income (and										
none of the										
above										
problems)	1,093	3,594	1,264	179	6,130	1,108	1,689	2,285	872	5,954

			Renter			Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Zero/negative										
Income (and										
none of the										
above										
problems)	563	0	0	0	563	705	0	0	0	705

Table 7 – Housing Problems Table

Data 2011-2015 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

			Renter					Owner		
	0-30%	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		AMI	50%	80%	100%	
		AMI	AMI	AMI			AMI	AMI	AMI	
NUMBER OF HOUS	EHOLDS									
Having 1 or more										
of four housing										
problems	5,960	1,318	709	183	8,170	2,654	1,613	732	107	5,106
Having none of										
four housing										
problems	2,174	5,275	5,845	2,070	15,364	2,453	5,610	9,240	5,675	22,978
Household has										
negative income,										
but none of the										
other housing										
problems	563	0	0	0	563	705	0	0	0	705

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

		Re	enter		Owner					
	0-30%	>30-50%	>50-80%	Total	0-30%	>30-50%	>50-80%	Total		
	AMI	AMI	AMI		AMI	AMI	AMI			
NUMBER OF HOUSEHOLDS										
Small Related	2,862	2,103	453	5,418	1,111	1,122	1,151	3,384		
Large Related	603	290	200	1,093	146	247	153	546		
Elderly	1,228	728	312	2,268	1,602	1,365	955	3,922		

		Re	enter		Owner					
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total		
Other	2,276	1,527	478	4,281	864	430	468	1,762		
Total need by	6,969	4,648	1,443	13,060	3,723	3,164	2,727	9,614		
income										

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

		Re	nter			Ow	/ner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30-50% AMI	>50- 80% AMI	Total			
NUMBER OF HOUSEHOLDS											
Small Related	2,324	349	20	2,693	773	548	117	1,438			
Large Related	473	80	0	553	78	48	19	145			
Elderly	963	156	109	1,228	957	586	214	1,757			
Other	1,943	269	20	2,232	733	238	93	1,064			
Total need by income	5,703	854	149	6,706	2,541	1,420	443	4,404			

Table 10 - Cost Burden > 50%

Data

2011-2015 CHAS

Source:

5. Crowding (More than one person per room)

			Renter					Owner		
	0-	>30-	>50-	>80-	Total	0-	>30-	>50-	>80-	Total
	30%	50%	80%	100%		30%	50%	80%	100%	
	AMI	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUSEH	IOLDS									
Single family										
households	707	314	377	119	1,517	100	115	160	4	379
Multiple, unrelated										
family households	54	29	55	25	163	24	19	82	38	163
Other, non-family										
households	15	25	49	20	109	0	0	20	0	20
Total need by	776	368	481	164	1,789	124	134	262	42	562
income										

Table 11 – Crowding Information - 1/2

Data Source: 2011-2015 CHAS

		Rei	nter		Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
Households with									
Children Present	0	0	0	0	0	0	0	0	

Table 12 - Crowding Information - 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

Estimates of the number of non-elderly single person households in need of housing assistance are included in the "other, non-family" category of Tables 9 and 10. This category includes multi-person households whose members are unrelated (e.g., roommates, un-married partners, etc.). There are an estimated 6,043 single-person or multi-person unrelated households with low or moderate incomes who spend more than 30% of their income on housing. Single-person or multi-person unrelated households comprise a quarter of all households experiencing cost burdens. The majority (71%) are renters and the remaining 29% are owners.

For renter households, over half (53%) of single person households experiencing cost burdens have very low incomes (0-30% HAMFI), 36% have low incomes (>30-50% HAMFI), and the remaining 16% have moderate incomes (>50-80% AMI). Similar to the distribution of renter households, very low income single-person, owner households comprise nearly half (49%) of all owner households with cost burdens. However, unlike the renter household population, owner households with moderate-income levels represent a larger share (27%) of single person households with cost burdens compared to low-income single person, owner households with cost burdens (24%).

More than half (3,296 households) of single-person, non-family households with cost burdens have housing costs that exceed 50% of their income. Single person, non-family renters and owners comprise 33% and 24%, respectively, of severely cost burdened households. Approximately 24% of single person households experiencing severe cost burdens are households with incomes under 30% HAMFI. The proportion increases to 29% when including the number of households with incomes under 50% HAMFI.

Table 11 provides data for single-person, non-family households that indicate only a small percentage (5%) experience problems with overcrowding. Similar to the distribution of households with cost burdens, renter households experiencing overcrowding outnumber owner households.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Data gathered from the 2011-2015 ACS estimates 33,465 disabled persons residing in the Gastonia Consortium, approximately 15% of the consortium's total population. There is no data available that

shows housing needs of households with disabled persons, however, patterns found among CHAS data on household income and housing problems can be used to estimate the need for housing assistance among the disabled population. Assuming the pattern of low- to moderate-income households experiencing more than one housing problems applies, poverty status data could indicate if disabled populations have a greater risk of experiencing housing problems. 2011-2015 ACS estimates 26% of the disabled population fall below the poverty level. In comparison, households with incomes below 30% HAMFI comprised only 18% of all households in the Gastonia Consortium, but accounted for 65% of all households experiencing one or more housing problems. Therefore, a larger proportion of low-income residents would likely indicate increased susceptibility to housing problems for disabled persons. Additionally, people with disabilities often face greater difficulty finding appropriate housing, given the scarcity of housing that is both affordable and accessible to people with disabilities. 70/128 respondents high priority for housing for people with disabilities

The Jamie Kimble Foundation for Courage conducted a statewide study in 2018 titled, *The Economic Impact of Domestic Violence*, which estimated 3,500 victims of domestic violence in Gaston County. The NC Council for Women and Youth Involvement requires all state-funded service providers to submit semi-annual reports detailing demographics and types of services provided for victims of domestic violence and sexual assault. According to data submitted in 2014-2015, service providers in Gaston County reported 204 domestic violence clients and 126 sexual assault clients. Among domestic violence clients, shelter services were provided for a total of 214 people including children. Service providers reported that shelters were at full capacity for 244 days and 4 clients were referred to other shelters due to a lack of space. Surveys conducted also show 74 out of 127 respondents felt a high need for domestic violence services in Gastonia.

What are the most common housing problems?

CHAS data indicates the most common housing problems in the Gastonia Consortium regardless of tenure type are unaffordable housing costs. Over one-quarter of all households in the Gastonia Consortium experience housing cost burdens of which 91% are low- to moderate-income households. The proportion of low- to moderate-income households increases to 99% among households experiencing severe housing cost burdens. 52% of all households with incomes under 30% HAMFI experience severe cost burdens. Renter households with low incomes (>30-50% HAMFI) are the most likely to experience cost burdens compared to renter households in other income bands. Owner households with incomes between 50% and 80% AMI represent 38% of all owner households affected by cost burdens.

In addition to CHAS data on housing cost burdens, housing affordability problems are found to be present in Gaston County by other studies that use different datasets. The North Carolina Housing Coalition reports that 39% of all cost-burdened renters faced an eviction filing in 2019. The data provided in the community profile for Gaston County suggests the cost of rent that is affordable to the average renter is \$616 per month, however, the average rent for a two-bedroom apartment is \$967 per month.

The most common housing problems are related to affordability; however, overcrowding and substandard housing are problems experienced by approximately 3% of all households in DeKalb County. Although 3% does not seem significant, it accounts for 2,863 households possibly living with severe housing problems.

Are any populations/household types more affected than others by these problems?

Renter households are disproportionately affected by housing problems than owner households. Generally, low to moderate income households are also more likely to experience one of the listed housing problems. Table 8 indicates renters with income less than 30% HAMFI comprise 65% of all households experiencing one or more housing problems. The proportion balloons to 87% when including the number of renter households with incomes under 50% HAMFI.

The number of renter households (1,707) that experience overcrowding is more than three times the number of owner households (548) with the same problem. Households with low to moderate income regardless of tenure type are also more likely to experience overcrowding. Households experiencing cost burdens skews slightly towards renters and low- to moderate-income households. 95% of all cost burdened households are comprised of households with very low to moderate income of which 43% are households below 30% HAMFI. Renter households with incomes less than 30% HAMFI experiencing severe cost burdens is the largest subgroup (5,060 households). The second largest subgroup (3,594 households) is comprised of renter households with incomes between 30% and 50% HAMFI experiencing cost burdens. Owner households with incomes less than 30% HAMFI and incomes between 50% and 80% HAMFI also represent a significant portion (21%) of all cost burdened households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

According to the 2015 CHAS data, 18% of households in the Gastonia Consortium are living at or below the poverty level. According to 2015 5-Year ACS data, the majority of the population living at or below poverty level are between the ages of 18 and 64, female, white, and employed. Proportionately, individuals that identify as some other race (36%) or two or more races (35%) and unemployed women (38%) are more likely to live at or below poverty level. Families with small children comprise approximately 19% of all extremely low-income households. 36% of all families that have a female householder with no husband are below poverty level, nearly six times the proportion of married couple families below poverty. 49% of single parent, female households with children live below poverty level. Low wages, rising rental costs, and the scarcity of affordable housing for low- and extremely low-income households place vulnerable households at even greater risk for eviction or homelessness. Individuals and families at imminent risk and those who have experienced homelessness and are receiving rapid rehousing assistance often face a myriad of barriers including prior histories of homelessness or eviction,

chronic physical or mental disabilities, poor credit, criminal histories, and limited access to additional education or job skills training. The greatest need of formerly homeless families and individuals receiving rapid re-housing assistance is the availability of standard housing that is affordable to households at or below 50% AMI.

For formerly homeless families and individuals nearing the termination of assistance, the top needs are for increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; access to transitional and supportive housing programs; and ongoing case management and supportive services.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Gaston Lincoln Cleveland Continuum of Care does not prepare estimates of the number of households at risk of homelessness. In the last program year (2019), the Continuum of Care provided homelessness prevention through rental assistance for 45 units of housing (Gaston Lincoln Cleveland Continuum of Care. (2019). 2019 Grant Inventory Worksheet - NC-509: Gastonia/Cleveland, Gaston, Lincoln Counties CoC). According to Emergency Solutions Grant (ESG) standards, households eligible for homelessness prevention assistance include (1) includes under 30% of area median income, (2) lack of sufficient resources and support networks to retain housing without assistance, and (3) participation in initial consultation to determine eligibility and assess needs.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The most fundamental risk factor for homelessness is extreme poverty, leading to unaffordable rents or homeowner costs. Renters with incomes under 30% HAMFI and housing cost burdens over 50% are at risk of homelessness, especially if they experience a destabilizing event such as a job loss, reduction in work hours, or medical emergency/condition. Such factors may also put low income homeowners at risk of foreclosure and subsequent homelessness.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the housing needs of racial and ethnic groups at various income levels in comparison to needs at that income level as a whole to identify any disproportionately greater needs. According to HUD, a disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Tables 13 through 16 identify the number of households experiencing one or more of the four housing problems by householder race, ethnicity, and income level. The four housing problems include: (1) cost burdens (paying more than 30% of income for housing costs); (2) overcrowding (more than 1 person per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities.

Income classifications include:

- Very low income up to 30% of area median income (AMI) or \$ 24,250 for a family of four;
- Low income 30 to 50% AMI or \$24,251 to \$33,600 for a family of four;
- Moderate income 50 to 80% AMI or \$33,601 to \$53,750 for a family of four; and
- Middle income 80 to 100% AMI or \$53,751 to \$67,200 for a family of four.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,824	2,418	1,268
White	6,913	1,932	952
Black / African American	2,782	378	189
Asian	75	10	20
American Indian, Alaska Native	44	0	4
Pacific Islander	0	0	0
Hispanic	835	29	35

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

^{*}The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Out of a total of 14,510 very low-income households in the Gastonia Consortium, 10,824 (75%) have one or more housing problems. White households make up the majority of households experiencing one or more housing problems (64% or 6,913 households). Black or African American households make up 26% of very low-income households with one or more housing problems; Hispanic households make up 8%; and Asian households make up less than 1%. Given HUD's definition of disproportionately greater need, the proportion of American Indian and Alaska Native (91%) and Hispanic (93%) households that have one or more housing problems exceeds the threshold of the income level as a whole, therefore, meeting HUD's definition of a disproportionately greater need.

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,194	5,618	0
White	5,417	4,828	0
Black / African American	1,776	505	0
Asian	23	35	0
American Indian, Alaska Native	8	23	0
Pacific Islander	0	4	0
Hispanic	715	185	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Of the 13,812 low-income (30-50% AMI) households in the Gastonia Consortium, 59% of households have one or more housing problems. 66% households with one or more housing problems are white; 18% are Black or African American; 8% are Hispanic; less than 1% are Asian; and less than 1% are American Indian, or Alaska Native. The proportion of Black or African American (78%) and Hispanic (79%) households that experience one or more housing problems exceeds the threshold of HUD's definition of a disproportionately greater need.

^{*}The four housing problems are:

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,998	11,555	0
White	3,537	9,220	0
Black / African American	922	1,816	0
Asian	55	24	0
American Indian, Alaska Native	45	20	0
Pacific Islander	0	0	0
Hispanic	382	415	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Of the 16,553 moderate-income (50-80% AMI) households in the Gastonia Consortium, 30% of households have one or more housing problems. 71% of households in the moderate-income category with one or more housing problems are white; 18% are Black or African American; 8% are Hispanic; 1% are Asian; and less than 1% are American Indian, or Alaska Native. The proportions of Asian, American Indian/ Alaskan Native, and Hispanic with one or more housing problems exceeds the designated 40% threshold which suggest a disproportionately greater need.

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,341	6,680	0
White	991	5,319	0
Black / African American	258	908	0
Asian	30	110	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0

^{*}The four housing problems are:

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Hispanic	49	264	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Just under 17% of 8,021 middle-income households have one or more housing problems. Nearly three quarters of households in this income category with one or more housing problems are white; 19% are Black or African American; 4% are Hispanic; and 2% are Asian. There are no racial or ethnic groups that exhibit a disproportionately greater need according to HUD's definition.

Discussion

Overall, while housing problems are most common in households in the lowest income groups, they are prevalent among all income groups. White households made up the clear majority of households in all income groups in Gastonia Consortium as well as the majority of households with one or more housing problems. Although white households outnumbered other racial or ethnic groups in absolute numbers, Hispanic households in the Gastonia Consortium through most income levels consistently experience disproportionately greater need as defined by HUD.

For the very low-income group, the proportions of white and Asian households with one or more housing problems were the lowest. Although a large proportion (83%), Black or African American households with one or more housing problems in the very low-income group did not exceed the threshold defined by HUD to be determined a population with disproportionately greater need. Both Hispanic and American Indian/Alaska Native households with one or more housing problems comprised more than 90% of all households in the respective racial or ethnic groups with very low-income. However, among the racial and ethnic groups with low incomes, the proportion of American Indian/Alaska Native households with one or more problems was the lowest of all groups while the large proportions of African American and Hispanic households with one or more problems indicate disproportionately greater needs.

At moderate incomes (50-80% AMI), data indicates disproportionately greater needs for three racial and ethnic groups: Asian, American Indian/ Alaska Native, and Hispanic. Housing need rates for white, and Black or African American households were similar to proportions for the entire jurisdiction. For the middle-income households, proportions for all racial and ethnic groups with one or more problems were

^{*}The four housing problems are:

greater than the jurisdiction as a whole, however, no groups exceeded the threshold to indicate disproportionately greater need.

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the severe housing needs of racial and ethnic groups at various income levels in comparison to severe needs at that income level as a whole to identify any disproportionately greater needs. Like the preceding analysis, this section uses HUD's definition of disproportionately greater need, which occurs when one racial or ethnic group at a given income level experiences housing problems at a rate that is at least 10 percentage points greater than the income level as a whole.

Tables 17 through 20 identify the number of households with one or more of the severe housing needs by householder race and ethnicity. The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing and utilities); (2) severe crowding (more than 1.5 people per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

Income classifications include:

- Very low income up to 30% of area median income (AMI) or \$ 24,250 for a family of four;
- Low income 30 to 50% AMI or \$24,251 to \$33,600 for a family of four;
- Moderate income 50 to 80% AMI or \$33,601 to \$53,750 for a family of four; and
- Middle income 80 to 100% AMI or \$53,751 to \$67,200 for a family of four.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,614	4,627	1,268
White	5,413	3,431	952
Black / African American	2,312	853	189
Asian	65	20	20
American Indian, Alaska Native	44	0	4
Pacific Islander	0	0	0
Hispanic	690	175	35

Table 17 - Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

^{*}The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Out of a total of 14,509 very low-income households, 59% of households in the Gastonia Consortium have one or more severe housing problems. Close to two-thirds of households in this income category with one or more severe housing problems are white (63% or 5,413 households); 27% are Black or African American; 8% are Hispanic; and less than 1% are Asian or American Indian/Alaska Native. Three groups with one or more problems exceed the threshold indicating disproportionately greater need. American Indian/Alaska Native households with one or more severe problems comprise 92% of all American Indian/Alaska Native households with very low income. Hispanic and Black or African American households have the second and third highest percentage of households with severe problems at 77% and 69%, respectively.

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,931	10,885	0
White	1,910	8,324	0
Black / African American	563	1,724	0
Asian	19	39	0
American Indian, Alaska Native	4	28	0
Pacific Islander	0	4	0
Hispanic	305	599	0

Table 18 - Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

Over a fifth of the 13,816 low-income households in the Gastonia Consortium have severe housing problems. 65% of households in this income category with one or more severe housing problems are white; 19% are Black/African American; 10% are Hispanic; and less than 1% are Asian or American Indian/Alaska Native. Asian and Hispanic households exceed the HUD designated threshold of

^{*}The four severe housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

disproportionately greater need, with 33% and 34%, respectively, of households with low income experiencing one or more severe housing problems.

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	1,441	15,085	0	
White	947	11,780	0	
Black / African American	260	2,480	0	
Asian	20	59	0	
American Indian, Alaska Native	0	65	0	
Pacific Islander	0	0	0	
Hispanic	167	620	0	

Table 19 - Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

Only 9% of the 16,526 moderate-income households experience severe housing problems in the Gastonia Consortium. Two-thirds of households in this income category with one or more severe housing problems are white; 24% are Black or African American; 12% are Hispanic; and 1% are Asian. The share of households with severe housing needs for each racial and ethnic group range from 7% to 25%. Similar to proportions among groups in the low-income level, Asian and Hispanic households with one or more severe housing problems exceed the threshold to indicate disproportionately greater need in the moderate-income group.

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	290	7,745	0
White	171	6,144	0

^{*}The four severe housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	114	1,056	0
Asian	0	140	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4	314	0

Table 20 - Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Among the middle-income group, only 4% of all households experience severe housing problems. 59% of all households in this income category with one or more severe housing problems are white; 39% are Black or African American; 1% are Hispanic. There are no racial and ethnic groups that exhibit disproportionately greater need and shares of households experiencing severe housing needs range from 1% for Hispanic households to 10% for Black or African American households.

Discussion

White households make up the majority of households in all income groups as well as the majority of households with one or more severe housing problems, however, only non-white groups exhibited disproportionately greater need across very-low to moderate income groups. Similar to data presented in NA-15, Hispanic households with one or more severe housing problems in the Gastonia Consortium consistently experience disproportionately greater need across very low- to moderate-income levels. Asian households with one or more severe housing problems also experience disproportionately greater need in multiple income levels. Other than Asian and Hispanic households, the other two racial or ethnic groups (Black/African American and American Indian/Alaska Native) to experience disproportionately greater rates of severe housing need are limited to the very low-income level.

^{*}The four severe housing problems are:

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. While the preceding sections assessed all housing and severe housing problems, Table 21 focuses only on what share of their income households spend on housing. Data is broken down into groups spending less than 30% of income on housing costs, those paying between 30 and 50% (i.e., with a cost burden), and those paying over 50% (i.e., with a severe cost burden). The final column, "no/negative income," identifies households without an income, for whom housing as a share of income was not calculated. Note that no racial or ethnic group has more than 5% of households with no or negative income.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	56,269	13,623	11,305	1,300
White	46,695	9,499	7,335	962
Black / African American	6,437	2,753	2,882	189
Asian	614	112	100	20
American Indian, Alaska				
Native	156	49	48	4
Pacific Islander	4	0	0	0
Hispanic	1,868	979	795	35

Table 21 - Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

Table 21 shows that approximately nearly a third of all households in the Gastonia Consortium experience housing cost burdens. White households comprise 68% of all cost burdened households in the consortium, however, white households with housing cost burdens comprise some of the lowest shares (15% and 11% among each respective racial or ethnic group. Asian households are least likely to be housing cost burdened, with only 13% and 12% spending more than 30% and 50% of income on housing costs. Black/African American and Hispanic households are most likely to be housing cost burdened with shares of cost burdened households ranging from 22% to 27%. Although the shares of American Indian/ Alaskan Native cost burdened households are in the median of all groups, percentages

are higher compared to the jurisdiction in both households paying more than 30% and 50% of their income.

Among cost burdened households in the Gastonia Consortium, 17% are cost burdened by spending between 30% and 50% of their income on housing costs. White households comprise the majority of cost burdened households spending between 30 and 50% of income on housing (9,499 households, or 70%). Black/African American households make up 20% of households spending 30-50% of income on housing costs; Hispanic households make up 7%; and Asian households make up less than 1%.

Households with housing costs that exceed 50% of household income are considered severely cost burdened. 14% of all households in the Gastonia Consortium experience a severe cost burden. Racial and ethnic composition of households with severe cost burdens are nearly identical to shares of households spending between 30% and 50% of their income on housing costs. White households comprise 65% of households with severe cost burdens. Black/African American households represent a quarter of households spending more than 50% of income on housing. The remainder of the households with severe cost burdens are comprised of Hispanic (7%), Asian (<1%), and American Indian/Alaska Native (<1%) households.

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

CHAS data indicates all non-white racial and ethnic groups have disproportionately greater needs relative to the needs of an entire income category. Hispanic households are the most common groups to exceed the threshold to exhibit disproportionately greater need across most categories and income levels. With the exception of both middle income categories (80%-100% AMI) the proportions of Hispanic households with housing problems in 6 out of 8 income categories are greater than the jurisdiction as a whole and exceed the threshold that indicates disproportionately greater need.

Figures for American Indian and Alaska Native households also exhibit disproportionately greater need in 3 out of 8 income categories. The proportion of American Indian and Alaska Native households with housing problems exceeds the HUD-designated threshold in both very low-income categories. American Indian and Alaska Native households with moderate income with housing problems also exceed figures for the category and jurisdiction as a whole.

Asian households with low-to moderate-income levels are disproportionately impacted by housing problems. Asian households with incomes between 50% and 80% HAMFI experience housing problems at a disproportionate rate. Asian households with incomes between 30% and 50% HAMFI that experience severe housing problems also exceeds the threshold for disproportionately greater need.

Black/African American households are disproportionately affected by housing problems in two income categories: low income households with housing problems and very low income households with severe housing problems.

If they have needs not identified above, what are those needs?

Although not reflected in HUD's Comprehensive Housing Affordability Strategy (CHAS) data, the Point-in-Time count of homeless persons in the Gaston, Lincoln, and Cleveland Continuum of Care indicates that Black/African American residents are more likely to be homeless than any other racial or ethnic group. Black/African American residents make up 28% of the homeless population in the three-county area, compared to only 15% of the population overall. Section NA-40 discusses homeless needs by race and ethnicity in greater detail.

The Analysis of Impediments to Fair Housing Choice completed by Gastonia in 2019 indicates that there are also racial disparities in access to homeownership. In Gastonia, about two-thirds of white households own their homes (68%), compared to 35% of African American households and 27% of Latinos. African Americans are also somewhat less likely to apply for mortgage loans in Gaston County, making up 12% of the applicant pool compared to 16% of the population. For African Americans and Latinos that apply for mortgage loans, denial rates are higher than for white applicants. Home Mortgage Disclosure Act data for Gaston County from 2013 to 2017 shows that African Americans were denied 1.7

times as frequently as white applicants. Hispanic applicants were denied home purchase loans 1.3 times as frequently as white applicants. These data indicate that access to mortgage products and homeownership is another need for households of color in Gaston County.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

Gaston County residents are served by three housing authorities – the Gastonia Housing Authority (GHA), the Belmont Housing Authority, and the Mount Holly Housing Authority. GHA is the largest and manages the Section 8 / Housing Choice Voucher (HCV) program for the entire county, which includes about 1,650 vouchers, according to GHA's 2019 Public Housing Authority Annual Plan. Previously, GHA owned and operated about 400 units of public housing at three properties (Weldon Heights, Mountain View, and Linwood Terrace), however, in recent years, GHA has converted all its public housing properties under HUD's Rental Assistance Demonstration (RAD) program. Under this program, housing authorities move public housing units to project-based Section 8 voucher assistance, allowing a nonprofit or for-profit entity to own and manage the property and obtain additional financing for maintenance and rehabilitation. While Weldon Heights, Mountain View, and Linwood Terrace are no longer public housing, they still provide affordable housing for low-income households, including newly-renovated three-, four-, and five-bedroom units. Note that these recent RAD conversions are not reflected in the HUD-provided figures in Tables 22 through 25.

The Belmont Housing Authority owns and operates one public housing property – Flowers Court – which includes 50 two-, three-, and four-bedroom apartments. Belmont Housing Authority also manages Myrtle Terrace, a 32-unit, one-bedroom affordable rental community with project-based Section 8 assistance.

Mount Holly Housing Authority owns the 46-unit Holly Hills Apartments, which is managed by the Statesville Housing Authority.

Other privately-owned project-based Section 8 and Low Income Housing Tax Credit (LITHC) communities provide additional affordable housing in Gaston County.

Totals in Use

					Program Type					
		Certificate	Mod-	Public	Vouchers					
			Rehab	Housing	Total	Project -	Tenant -	Speci	al Purpose Vo	ucher
						based	based	Veterans	Family	Disabled
								Affairs	Unification	*
								Supportive	Program	
								Housing		
# of un	nits vouchers in use	0	0	485	1,153	52	1,025	0	0	72

Table 22 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

Characteristics of Residents

			Progra	m Type				
	Certificate	Mod-	Public	Vouchers				
		Rehab	Housing	Total	Project -	Tenant -	Special Purp	ose Voucher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants								
(>62)	0	0	133	209	39	167	0	0
# of Disabled Families	0	0	60	279	13	195	0	0
# of Families requesting accessibility								
features	0	0	485	1,153	52	1,025	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Specia	Special Purpose Voucher	
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	125	302	32	237	0	0	33
Black/African American	0	0	352	848	20	786	0	0	38
Asian	0	0	6	2	0	1	0	0	1
American Indian/Alaska									
Native	0	0	1	0	0	0	0	0	0
Pacific Islander	0	0	1	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disable	d. Mainstream O	ne-Year. Mai	nstream Five	-vear. and Nur	sing Home Tran	nsition	1	1	

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total Project - Tenant - Special Purpose Voucher					ucher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	4	13	0	11	0	0	2
Not Hispanic	0	0	481	1,140	52	1,014	0	0	70
*includes Non-Elderly Disabled	, Mainstream	One-Year, M	lainstream Fi	ve-year, and Nu	rsing Home Tra	insition	•	•	

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Data from HUD's A Picture of Subsidized Households shows that there are about 644 people with a disability in households with Housing Choice Vouchers in Gaston County, making up about 18% of all voucher holders. There are an estimated 200 people with a disability living in housing with project-based Section 8 assistance (17% of all project-based Section 8 residents) and 30 people with a disability in public housing (10% of public housing residents). Stakeholder input indicates that voucher holders may have difficulty finding units that accept HCVs; for people with a disability that requires a physically accessible unit, this search is often more difficult.

For applicants on public housing and HCV wait lists, the wait for an affordable and accessible unit can be long. HUD's A Picture of Subsidized Households data shows that the average household holding an HCV in Gaston County waited about 14 months before receiving it. For public housing, the average wait time was considerably longer at 32 months. Currently, GHA's wait list for HCVs is closed, RAD properties are accepting applications. Belmont Housing Authority is accepting applications for the properties it manages, although there is a wait list for housing.

Stakeholder input for this Consolidated Plan and for the City's 2019 Analysis of Impediments to Fair Housing Choice indicates a general need for more affordable housing options for people with disabilities. Stakeholders noted that GHA and LIHTC properties are likely to be the only options for units that are both accessible and affordable. As the AI states, "it is highly likely that people with disabilities who are unable to work and rely on Supplemental Security Income (SSI) as their sole source of income face substantial cost burdens and difficulty locating affordable housing."

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

GHA identifies quality, affordable housing that is safe, sanitary, in good repair, and free from drugs and violent crime as a primary need for housing choice voucher holders. To meet that need, GHA strives to provide housing in diverse, mixed-income, livable communities that offer residents opportunities for self-sufficiency. In addition to affordable housing, stakeholders discussed other needs faced by low-income households in Gastonia, including transportation (especially for evening shifts), childcare, workforce development, financial counseling, grocery store access, and youth services or programming.

How do these needs compare to the housing needs of the population at large

Needs of voucher holders and public housing residents are different from those of Gaston County's overall low- and moderate-income households only in that housing authority residents are housed in stable and decent housing. With this need met, residents are able to work toward meeting other needs

that families typically face in addition to housing insecurity, such as employment, childcare, healthcare, transportation, food, and other essential needs. GHA works to promote essential self-sufficiency skills, including through its Family Self-Sufficiency program, which had 27 families participating as of its 2019 Annual PHA Plan. Collaboration between GHA and the City's Homebuyer's Assistance Program that enables GHA residents to purchase a home frees up a voucher or subsidized unit for use by another low-income household.

Discussion

Not applicable

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

This section provides estimates of the population experiencing homelessness in the region and details the needs of people experiencing homelessness in the city of Gastonia. The Gaston Lincoln Cleveland Continuum of Care conducts an annual Point-in-Time count of people who are homeless during the last ten days of January each year. The 2019 Point-in-Time count for Gaston, Lincoln, and Cleveland Counties was held in January 2019. It counted 259 households with 324 people experiencing homelessness in total.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness		Estimate the # experiencing	Estimate the #	Estimate the # exiting	Estimate the # of days persons
	on a giv	en night	homelessness	homeless	homelessness	experience
			each year	each year	each year	homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s)						
and Child(ren)	0	0	0	0	0	0
Persons in Households with Only						
Children	0	0	0	0	0	0
Persons in Households with Only						
Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Alternate Data Source Name: 2019 Point in Time Count Data Source Comments:

	Shelte	red	Harbalkan d	Takal	
	Emergency	Transitional	Unsheltered	Total	
Total number of households	165	28	66	259	
Total number of persons	213	39	72	324	
Number of children (under age 18)	46	10	3	59	
Number of persons age 18 to 24	14	3	2	19	
Number of persons over age 24	153	26	67	246	

Data Source: Gaston Lincoln Cleveland Continuum of Care 2019 Point-In-Time Count

Gaston Lincoln Cleveland CoC 2019 Point-in-Time Homeless Count

	Shelte	red	Harbakan d	Total	
	Emergency	Transitional	Unsheltered	Total	
Total number of households	25	6	0	31	
Total number of persons	71	17	0	88	
Number of children (under age 18)	40	10	0	50	
Number of persons age 18 to 24	7	1	0	8	
Number of persons over age 24	24	6	0	30	

Data Source: Gaston Lincoln Cleveland Continuum of Care 2019 Point-In-Time Count

Persons in Households with at Least One Adult and One Child

	Shelte	red	Unabalkanad	Total	
	Emergency	Transitional	Unsheltered	Total	
Demographic Summary by Gender					
Female	106	23	17	146	
Male	107	16	55	178	
Transgender	0	0	0	0	
Gender Non-Conforming	0	0	0	0	
Summary of Other Populations Repo	rted				
Chronically Homeless	27	0	33	60	
Severely Mentally III	25	1	28	54	
Chronic Substance Abuse	7	17	35	59	
Veterans	1	0	5	6	
HIV/AIDS	2	0	0	2	
Victims of Domestic Violence	24	8	0	32	
Unaccompanied Youth	13	2	5	20	
Parenting Youth	4	0	0	4	
Children of Parenting Youth	5	0	0	5	

Data Source: Gaston Lincoln Cleveland Continuum of Care 2019 Point-In-Time Count

Demographic Summary of Sheltered and Unsheltered Homeless Persons

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Of the 324 people experiencing homelessness counted in the Point-in-Time count, 60 people were counted as chronically homeless (19% of total people experiencing homelessness). Of the 60 people who were chronically homeless, 27 were sheltered in emergency shelter (45%), none were in transitional housing, and 33 were unsheltered (55%).

The 2019 Point-in-Time count counted 88 people in families with children (27% of people experiencing homelessness), 6 veterans (2%), and 29 people in unaccompanied and parenting youth households (9%). The 88 people in families with children included 31 households with 50 children under the age of 18. All of the 88 persons in these households were sheltered, with 71 people (81%) in emergency shelters and 17 (19%) in transitional housing.

Of the 6 veterans experiencing homelessness, 1 was in an emergency shelter (17%), none were in transitional housing, and 5 were unsheltered (83%).

Unaccompanied youth households included 20 unaccompanied youth, 4 parenting youth, and 5 children of parenting youth. Of the 20 unaccompanied youth, 13 were in emergency shelters (65%), 2 were in transitional housing (10%), and 5 were unsheltered (25%). All parenting youth and children in parenting youth households were in emergency shelters (100%).

Note that these figures do not represent the entire homeless population in the counties, but rather the number of homeless that were sheltered and unsheltered during the 2019 Point-in-Time count. As the inventory of homeless facilities in the area shows, a considerably higher number of people who are homeless are assisted within the counties than the Point-in-Time count reflects.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	ered: Unsheltered	
NA/In this		0	
White		0	0
Black or African American		0	0
Asian		0	0
American Indian or Alaska			
Native		0	0
Pacific Islander		0	0
Ethnicity:	Sheltered:		Unsheltered (optional)
Hispanic		0	0
Hispanic		U	0
Not Hispanic		0	0

Alternate Data Source Name:

2019 Point in Time Count

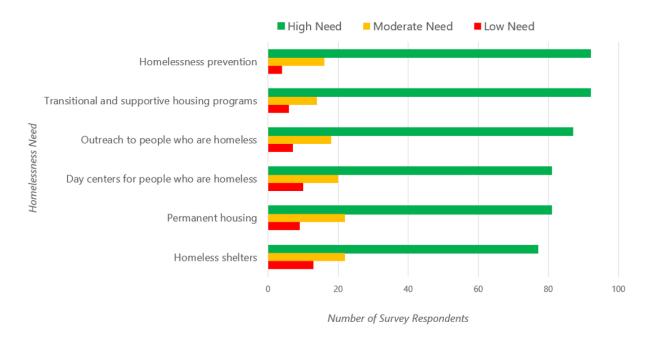
Data Source

Comments:

	Shelte	red					
	Emergency	Transitional	Unsheltered	Total			
Homeless Persons by Race							
White	144	21	56	221			
Black or African American	66	14	12	92			
Asian	0	0	0	0			
American Indian or Alaska Native	0	0	0	0			
Native Hawaiian or Pacific Islander	0	0	0	0			
Multiple Races	3	4	4	11			
Homeless Persons by Ethnicity							
Non-Hispanic / Non-Latino	207	39	69	315			
Hispanic / Latino	6	0	3	9			

Data Source: Gaston Lincoln Cleveland Continuum of Care 2019 Point-In-Time Count

Race and Ethnicity of Sheltered and Unsheltered Homeless Persons in the Gaston Lincoln Cleveland CoC



Homeless Needs from the Community Needs Survey

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2019 Point-in-Time count identified 31 households experiencing homelessness with at least one adult and one child, which included a total of 88 people, 50 of whom were under the age of 18 (57%). All of the 88 people in households with at least one adult and one child were sheltered in emergency shelter (71 people, or 81% of people in households with at least one adult and one child) or transitional housing (17 people, or 19%), and none were unsheltered. Of the 6 veterans counted during the Point-in-Time count, 1 was in an emergency shelter (17%), none were in transitional housing, and 5 were unsheltered (83%).

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The Point-in-Time count categorized the number of sheltered and unsheltered individuals who were homeless in Gaston, Lincoln, and Cleveland counties by race and ethnicity. The count found that 221 of the 324 sheltered and unsheltered individuals were white (68% of total), 92 were African American (28%), and 11 were multiple races (3%). Regarding ethnicity, the count found that 9 of the 324 total sheltered and unsheltered homeless population in the counties were Hispanic/ Latino (3%), and 315 were non-Hispanic/ Latino (97%).

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2019 Point-in-Time count counted a total of 324 homeless persons, including 252 sheltered (78%) and 72 unsheltered persons (22%). Of the 252 sheltered individuals, 213 (85%) were in emergency shelters, and 39 (16%) were in transitional housing.

However, stakeholders interviewed in the course of this planning process noted that people experiencing homelessness may be doubling up, 'couchsurfing,' or living in vehicles. In this way, many people experiencing homelessness may not be included in the Point-in-Time count.

Discussion:

Data from both the Point-in-Time count and stakeholder input indicate a high level of need for homelessness services in Gastonia. Survey respondents rated all homeless services at high levels of need. In particular, 82% of survey respondents rated homeless prevention and transitional/supportive housing as high needs, and 77% rated outreach to people who are homeless as a high need. Day centers for people who are homeless was rated as a high need by 72% of survey respondents, and permanent housing was rated as a high need by 71%. Access to homeless shelters was rated as a high need by 68% of respondents.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d) Introduction

This section discusses the characteristics and needs of people in various subpopulations in Gastonia who are not necessarily homeless but may require supportive services, including people with HIV/AIDS, the elderly, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, victims of domestic violence, and individuals with a criminal record and their families.

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly

Fifteen percent (15%) of Gastonia's population is elderly, aged 65 and over, and 7% of the population is considered frail elderly, aged 75 and over, according to 2013-2017 5-Year American Community Survey estimates. Nearly 40% of elderly individuals aged 65 and over in the city have a disability.

People with Disabilities

Fifteen percent (15%) of Gastonia residents have one or more disabilities. The figure below shows shares of population with a disability by disability type.

People with HIV/AIDS and their Families

As of the end of 2016, there were approximately 7,946 persons living with HIV in the Charlotte-Concord-Gastonia MSA, a rate of 387.9 people living with HIV per 100,000 population. There were 393 new HIV diagnoses in the MSA in 2017, a rate of 18.8 new diagnoses per 100,000 population (Centers for Disease Control and Prevention. (2017). Diagnoses of HIV Infection among Adults and Adolescents in Metropolitan Statistical Areas--United States and Puerto Rico, 2017).

Immigrants and Refugees

An estimated 11,627 Gaston County residents are foreign-born, according to 2013-2017 5-Year American Community Survey estimates. Of these residents, an estimated 1,098 (9%) began residing in the United States in 2010 or later. Approximately 41% of all foreign-born residents in Gaston County are naturalized citizens, and 59% are not citizens. Of the foreign-born population who entered the United States in 2010 or later, an estimated 51% were born in Latin America, 34% were born in Asia, 7% were born in Africa, 4% were born in northern America, and another 4% were born in Europe.

Persons with Alcohol or Drug Addiction

The region that includes Gastonia and its surrounding counties has an estimated 5% rate of alcohol use disorder in the past year by individuals aged 12 and older, according to 2014-2016 data from the US Substance Abuse & Mental Health Data Archive (SAMHDA). About 1% of the region's population is estimated to have used cocaine use in the past year, and heroin use in the past year is estimated at 0.4 percent (Substance Abuse & Mental Health Data Archive. "Interactive National Survey on Drug Use and Health Substate Estimates"). There were an estimated 168 drug overdose deaths in Gaston County from 2015 to 2017, a rate of 26 persons per 100,000 population (County Health Rankings & Roadmaps. "Drug Overdose Deaths").

Victims of Domestic Violence

The Centers for Disease Control estimates that five percent (5%) of women and 6% of men in North Carolina have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in the past 12 months, equating to an estimated 1,897 women and 2,197 men in Gastonia (National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. (2017). The National Intimate Partner and Sexual Violence Survey (NISVS) | 2010-2012 State Report.).

Re-entry Populations

In the state of North Carolina, an estimated 81,000 residents are on probation, and 12,000 are on parole (Prison Policy Initiative. Profiles). This equates to an estimated 599 Gastonia residents on probation and 89 on parole, based on city and state populations. The large numbers of city residents under criminal justice supervision indicates a continuing need to address the housing and supportive service needs of this population in Gastonia.

What are the housing and supportive service needs of these populations and how are these needs determined?

The primary housing and supportive needs of these subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and reentry populations) were determined by input from both service providers and the public through the Housing and Community Needs Survey, public meetings, focus groups, and stakeholder interviews.

Housing that is Affordable, Accessible, Safe, and Low-Barrier

High housing costs make it difficult for vulnerable populations, who often live on very low incomes, to afford housing. Residents within these population subgroups often live at or below the federal poverty level. HUD's fair market rent documentation for FY 2020 estimates fair market rent for a two-bedroom

unit in Gastonia zip codes at \$860 to \$960 per month (HUD User. HUD Metro FMR Area Small Area FY 2020 Fair Market Rents). Because of the high cost of housing, there is a need to increase the availability of affordable housing for vulnerable populations.

Transportation

Access to transportation is an important concern for vulnerable population groups. Persons with disabilities and others without access to vehicles need housing close to transportation services in order to access employment, health services, and recreation opportunities. Persons with HIV/AIDS need housing nearby transportation services in order to access health services and other resources. If transit is not within walking distance, vulnerable populations need accessible, reliable transportation services to provide access to everyday needs.

Specialized Housing and Supportive Services

Specialized housing is often needed to target needs of specific vulnerable populations. For example, people with intellectual or developmental disabilities and people with alcohol or drug addiction have specific housing needs that may be addressed through housing with wraparound services. Persons living with HIV/AIDS may also need case management services and other supportive services, although the Housing First model emphasizes that supportive services should not be required in order for people living with HIV/AIDS to access housing.

Workforce Development and Employment Services

Vulnerable populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others.

Physical and Mental Health and Treatment Services

Access to healthcare is a need for vulnerable populations. Stakeholders and focus group participants noted a need for increased access to mental and physical health services for low-income residents. Stakeholders also emphasized a need for a wider range of drug and alcohol outpatient services.

Education/Combating Perceptions

Combatting stigmas is an important concern for many vulnerable populations. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Further, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing risk of homelessness.

Outreach

Outreach to vulnerable populations to ensure they are aware of available services is another need. This includes development of relationships and trust so that people feel comfortable seeking out needed services. There is also a need to provide clarity in marketing and in public buildings about what services are available.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Charlotte-Concord-Gastonia region ranked 24th among Metropolitan Statistical Areas (MSAs) in the rate of diagnoses of HIV infection as of 2017. There were 393 new HIV diagnoses in the MSA in 2017, a rate of 18.8 new diagnoses per 100,000 population. 322 of the 398 new diagnoses were of adult and adolescent men, and 71 were of adult and adolescent women (Centers for Disease Control and Prevention. (2017). Diagnoses of HIV Infection among Adults and Adolescents in Metropolitan Statistical Areas--United States and Puerto Rico, 2017).

As of the end of 2016, there were approximately 7,946 persons living with HIV in the Charlotte-Concord-Gastonia MSA, a rate of 387.9 people living with HIV per 100,000 population. Of the total persons living with HIV in the region in 2017, 5,709 were adult and adolescent men and 2,237 were adult and adolescent women.

Data is not available regarding prevalence and diagnoses of AIDS at the metro, county, or city level.

Discussion:

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f) Describe the jurisdiction's need for Public Facilities:

Buildings and infrastructure open to the general public, whether owned by the government or by nonprofits, may be considered public facilities under the CDBG program. Survey respondents ranked public facility needs in Gastonia, with the following as the top three responses: (1) improvements to existing facilities / ADA accessibility; (2) parks, gyms, and recreational fields; and (3) childcare centers. More specifically:

- Forty-four percent (44%) of survey respondents rated improvements to existing facilities/ADA accessibility as a high need and 43% rated them as a moderate need.
- Community parks, gyms, and recreational fields were rated as a high need by 43% of respondents and as a moderate need by 39%.
- Forty-four percent (44%) of respondents rated childcare centers as a high need and 37% rated them as a moderate need.

In addition to these needs, participants in stakeholder interviews, focus groups, and the community meeting noted a need for improvements to homeless shelters, development of a homeless day center, and development of a one-stop-shop for homeless services.

Public facility goals identified in local and regional plans include:

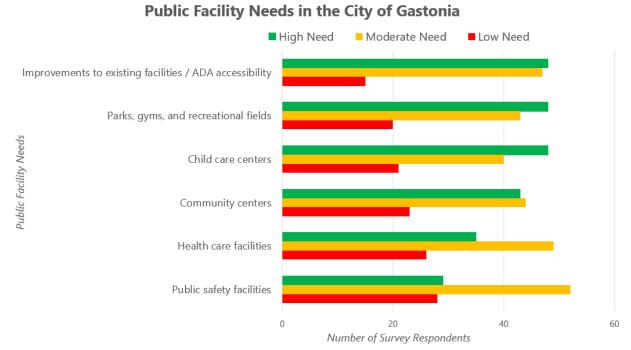
- Provide park and recreation facilities to meet the needs of a diverse population at accessible locations throughout the City.
- Emphasize the already established recreational amenities and encourage new recreational amenities as appropriate.
- Advocate for continued investment in regional amenities.
- Provide technical assistance to cities, towns and counties developing greenways, trails, pedestrian plans and recreational venues.
- Promote better access to outdoor spaces for seniors and increased ADA compliance.

How were these needs determined?

Gastonia's public facility needs were determined based on input from stakeholders engaged through interviews, focus groups, a public meeting, and a community survey completed by 132 respondents. Stakeholders included City staff and elected officials, nonprofit organizations, homeless housing and service providers, housing developers, civic organizations, and residents.

Needs were also determined based on a review of previous local and regional plans, such as Gastonia 2025 Comprehensive Plan: Our Place in the Future (2011), Gaston Tomorrow: Gaston County 2035

Comprehensive Land Use Plan (2016), and Prosperity for Greater Charlotte: Comprehensive Economic Development Strategy (2017-2022).



Public Facility Needs from the Community Survey

Describe the jurisdiction's need for Public Improvements:

Survey respondents were asked to rank public improvement needs in the city. The top three responses were street/road improvements, sidewalk improvement or expansion, and high-speed internet access. Figure 9 shows public improvement needs in the city as ranked by survey respondents. Of the top needs identified:

- Two-thirds of survey takers (68%) identified street/road improvements as a high need, and 25% identified them as a moderate need.
- Sidewalk improvement/expansion was rated as a high need by 49% of survey respondents and as a moderate need by 38% of respondents.
- Survey respondents also prioritized high-speed internet access, with 50% identifying it as a high need and 34% rating it as a moderate need.

In addition to the needs rated in the survey, stakeholders and meeting and focus group participants also described a need for continued neighborhood improvements (including in the Highland neighborhood) such as sidewalks and lighting, improved signage for Phillips Center, and sidewalk and pedestrian improvements around Ashbrook High School.

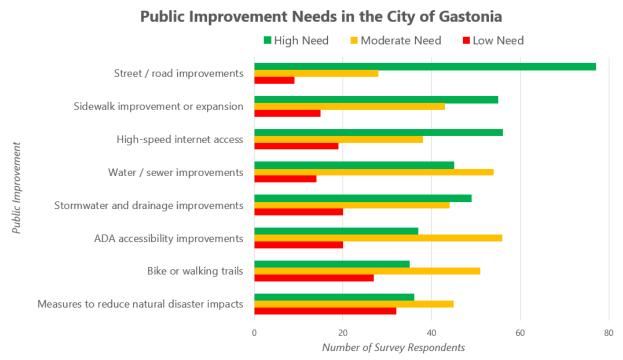
Public improvement needs identified in local and regional plans include:

- Provide technical assistance to cities, towns and counties developing greenways, trails, pedestrian plans and recreational venues.
- Promote better access to outdoor spaces for seniors and increased ADA compliance.
- Advocate for continued investment in regional amenities.

How were these needs determined?

Public improvement needs in Gastonia were determined based on input from stakeholders engaged through interviews, focus groups, a public meeting, and a community survey completed by 132 respondents. Stakeholders included City staff and elected officials, nonprofit organizations, homeless housing and service providers, housing developers, civic organizations, and residents.

Needs were also determined based on a review of previous local and regional plans, such as Gastonia 2025 Comprehensive Plan: Our Place in the Future (2011), Gaston Tomorrow: Gaston County 2035 Comprehensive Land Use Plan (2016), and Prosperity for Greater Charlotte: Comprehensive Economic Development Strategy (2017-2022).



Public Infrastructure Needs from the Community Survey

Describe the jurisdiction's need for Public Services:

Public services, such as case management, childcare, transportation assistance, job training, and programming for youth and senior centers, are an important component of the City's community development strategy. The top five public service needs selected by respondents to the Housing and Community Needs Survey include: (1) health and mental health services; (2) substance abuse / crime awareness; (3) abused and neglected children services; (4) senior services; and (5) youth services.

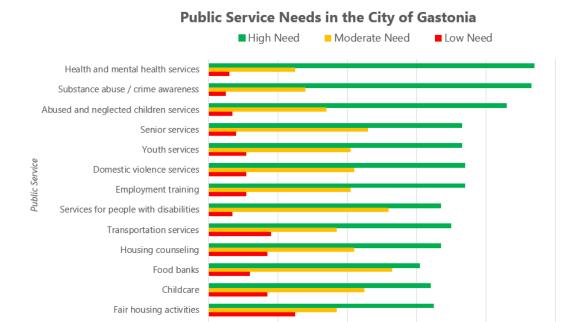
Health and mental health services were noted as high needs by 75% of survey respondents and as moderate needs by 20%. Substance abuse/crime awareness was noted as a high need by 74% of survey respondents and as a moderate need by 22% of respondents. Two-thirds of respondents (68%) ranked abused and neglected children services as high needs, and 27% ranked them as moderate needs. Figure 10 shows public service needs as ranked by survey respondents.

In addition to public service needs rated in the survey, meeting and focus group participants described a need for:

- A combination of services to assist homeless and formerly homeless individuals
- Mental health services
- Extended transportation hours to serve second and third shift workers
- Adult education and job training to attract and fill higher-wage jobs
- Financial counseling and homebuyer/home maintenance classes
- Financial education beginning in grade school
- Improved marketing about available services and programs
- First time offender program for people with substance abuse needs

How were these needs determined?

Public service needs were determined based on input from stakeholders engaged through interviews, focus groups, a public meeting, and a community survey completed by 132 respondents. Stakeholders included City staff and elected officials, nonprofit organizations, homeless housing and service providers, housing developers, civic organizations, and residents.



40

Number of Survey Respondents

100

Public Service Needs from the Community Survey

Neighborhood cleanups

Community needs related to COVID-19 impacts

On March 3, 2020, the North Carolina Department of Health and Human Services (NCDHHS) confirmed the first case of COVID-19 in North Carolina. By early May, NCDHHS reported more than 12,000 COVID-19 infections in the state, over 500 current hospitalizations, and 477 deaths as a result of the virus (North Carolina Department of Health and Human Services. COVID-19 North Carolina Dashboard). As of early May, Gaston County had 155 confirmed cases resulting in 4 deaths. On top of these health effects, the pandemic has precipitated historically unprecedented levels of unemployment. North Carolina residents filed 1,049,755 claims for unemployment insurance between March 15 and May 6, 880,040 (84%) of which were related to COVID-19 (North Carolina Department of Commerce, Division of Employment Security. Unemployment Claims Data). While the North Carolina Department of Commerce does not currently have data available regarding the distribution of unemployment insurance claims by county, the high percentage of these claims related to COVID-19 points to the significant impact of COVID-19 on employment. The sharp increase in unemployment claims and the rapid rise in COVID-19 cases are early indicators of a crisis widely expected to continue growing as the effects ripple into housing, education, and other facets of daily life. As the Coronavirus pandemic is a dynamic situation, the City of Gastonia's response has continued to unfold, including following state guidelines for easing restrictions and continuing to provide essential services (City of Gastonia. City's Coronavirus Response).

The needs faced by Gaston County residents related to COVID-19 have been extensive and varied. Residents with the virus face healthcare challenges, and those with weakened immune systems, such as

people living with HIV/AIDS, are particularly susceptible to infection. Small business owners and employees of businesses closed by state and county stay-at-home orders issued on March 27 have faced economic hardship, leaving many unable to provide groceries and food for their families and unable to make rent or mortgage payments. North Carolina stopped eviction and foreclosure hearings for 30 days in response to COVID-19; however, once these resume, residents who have had difficulty paying rents or mortgages will increasingly face housing instability. Essential workers who continue to work during the shutdown face childcare challenges due to schools being closed. Anxiety, stress, and mental health needs have also been recognized as factors related to the Coronavirus pandemic.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

While housing choices can be fundamentally limited by household income and purchasing power, a lack of affordable housing can be a significant hardship for low- and moderate-income households, preventing them from meeting other basic needs. Stakeholders and residents reported that affordable housing for families and individuals is a significant issue in the city of Gastonia. Data examined in the following sections also shows that rents in the city have increased more rapidly in recent years; there is a lack of housing in the city that is affordable to low- and moderate-income residents; and a high proportion of residents are cost-burdened or severely cost-burdened by housing costs.

In addition to reviewing the current housing market conditions, this section analyzes the availability of assisted and public housing and facilities to serve homeless individuals and families. It also analyzes local economic conditions and summarizes existing economic development resources and programs that may be used to address community and economic development needs identified in the Needs Assessment.

Note that sections MA-10 through MA-25 examine housing-related data for the Gastonia Consortium geography, which covers Gaston County, excluding Spencer Mountain and High Shoals and including Kings Mountain. HOME funds administered by Gastonia may be spent anywhere within the Consortium. Sections MA-30 through MA-65 are focused on the city of Gastonia, where CDBG funds may be spent.

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

Introduction

The 2011-2015 Five-Year American Community Survey estimated that there are 93,406 housing units in the Gastonia Consortium. The largest share of units are single-family detached structures (74%), followed by mobile homes, RVs, and vans (10%). About 7% of the Consortium's units are in small multifamily buildings of 5 to 19 units. Units in duplexes, triplexes, and fourplexes account for 4% of housing units. Single-family attached structures and units in large multifamily buildings (20 or more units) each account for 2% of units.

About two-thirds (66%) of the units in the Gastonia Consortium are owner-occupied, and one-third (33%) are renter-occupied. A large majority of owned housing has at least two bedrooms: 19% has two bedrooms and 80% has three or more bedrooms. Rental units tend to be smaller: 20% of units are studios or one-bedroom units. The most common rental unit contains two bedrooms (44%), while about one-third (35%) of renters live in homes with three or more bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	68,654	74%
1-unit, attached structure	1,633	2%
2-4 units	4,181	4%
5-19 units	6,947	7%
20 or more units	2,208	2%
Mobile Home, boat, RV, van, etc	9,783	10%
Total	93,406	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

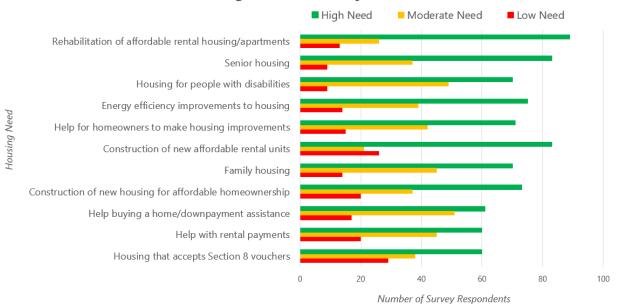
Unit Size by Tenure

	Owne	rs	Renters		
	Number	%	Number	%	
No bedroom	201	0%	2,109	7%	
1 bedroom	631	1%	3,763	13%	
2 bedrooms	10,220	19%	12,530	44%	
3 or more bedrooms	43,252	80%	9,781	35%	
Total	54,304	100%	28,183	99%	

Table 28 - Unit Size by Tenure

Data Source: 2011-2015 ACS





Housing Needs from the Community Survey

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Gastonia Housing Authority (GHA) serves low-income individuals and families through the Housing Choice Voucher and Project-Based Voucher programs. GHA reports administering about 1,650 Housing Choice Vouchers throughout the county. Three GHA-owned properties (Weldon Heights, Mountain View, and Linwood Terrace) together have about 400 units assisted through project-based vouchers.

The Belmont Housing Authority owns and operates one public housing property – Flowers Court – which includes 50 two-, three-, and four-bedroom apartments for families, seniors, and people with disabilities with incomes under 50% AMI. Belmont Housing Authority also manages Myrtle Terrace, a 32-unit, one-bedroom affordable rental community with project-based Section 8 assistance.

Mount Holly Housing Authority owns the 46-unit Holly Hills Apartments, which is managed by the Statesville Housing Authority.

Other multifamily properties include housing developed through HUD's Section 202 and 811 programs, which provide affordable supportive housing for the seniors and people with disabilities. According to HUD's Low Income Housing Tax Credit (LIHTC) database, there are also 56 tax credit properties in Gaston County that together provide about 1,580 units of housing affordable to households with incomes at or below 60% AMI.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Housing and Neighborhoods chapter of the City's Comprehensive Plan notes several trends that, absent policies focused on preserving the city's existing affordable housing stock and developing diverse new affordable housing options, indicate that Gastonia will continue to experience a loss of affordable housing inventory. Trends include housing costs that are rising more quickly than 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. Stakeholders interviewed as part of this planning process described increasing housing costs and a lack of affordable housing stock as primary concerns. More specifically, stakeholders noted concerns about rising housing costs downtown and loss of unsubsidized affordable housing around the FUSE development. Community input noted that rising property values as the FUSE area 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.

Federal law requires any LIHTC properties awarded credits after 1989 to maintain affordability for 30 years, although after the first 15 years, owners can leave the program through a relief process. After 30 years (or 15 years if owners are granted regulatory relief), properties can be converted to market-rate units. During the 2020-2024 Five-Year Consolidated Plan, nineteen LIHTC properties in Gaston County will age out of the 30-year affordability period. Together these properties have about 260 incomerestricted units.

Does the availability of housing units meet the needs of the population?

Cost burden data shows that affordability needs are particularly severe for renters with incomes under 30% of HUD Area Median Family Income (HAMFI), affecting more than 6,000 households in the Gastonia Consortium (see Table 7). 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 Gaston County residents.

On the ownership side, income and home value data indicate that starter home prices in the city are out of reach for many moderate- and middle- income households. Affordability data in the Needs Assessment supports this, with cost burdens impacting considerable shares of households up to 100% HAMFI. Focus group attendees echoed concerns regarding home prices that are out of reach for low-and moderate-income Gastonia residents. Further, homes priced at affordable levels may have structural or other issues that would require rehab to make them livable.

In terms of unit size, overcrowding impacts about 1,800 renters and 560 owners. Considering that the majority of rental units contain two bedrooms or fewer (64%), future affordable housing development should reflect continued need for 3+ bedroom rental units for larger families.

Describe the need for specific types of housing:

Data discussed in the Housing Need Assessment and in this section indicate the need for rental housing for very low-income households. The greatest need is for affordable rental housing units, particularly units that are affordable to households with income at or below 30 percent of the area median income.

Stakeholders that participated in the development of the Consolidated Plan also emphasized the following housing needs:

Rental Housing Needs

- Low- and moderate-income and mixed-income affordable rental housing in good condition. Rental housing in an affordable range (\$650-800) may be run down, and even those at \$1,000 per month and above may not be in decent condition.
- Short-term, emergency assistance when families have temporary issues (health needs, job loss, reduced hours, etc.) that make it difficult to pay rent and utilities for a period of time.
- New housing and more landlords that accept housing choice vouchers. There is a need to
 educate and develop relationships with landlords to increase voucher acceptance.

Homeownership Needs

- Continuation of the City's Home Buyer Club and Homebuyer's Assistance Program. They have been successful and there is potential to expand the educational components of these programs.
- Homes with sales prices between \$50,000 and \$100,000 for purchase by low- and moderate-income buyers. Many of these homes need major repairs, and would need housing rehab assistance to be combined with down payment assistance to work for first-time homebuyers. There is continued need for good case managers to guide people through the homeownership process.
- Increase homeownership in Ward 4, including targeted marketing of the City's homeownership programs to West Gastonia. There is a lack of knowledge/information in the community about available services, particularly in the African American community.
- Barriers clients face when purchasing or getting a loan include a lack of education on personal finance, large existing debts, a lack of savings, a lack of credit track record, a lack of verifiable income, and finding a property that is worth the price and passes inspections.

Other Housing Needs

- Senior housing, including housing with mother-in-law suites.
- Combination of housing options, including mixed-income housing. NIMBY issues impact affordable housing development.
- Consideration of inclusionary zoning to require that new housing developments provide a portion of units as affordable housing.
- Consideration of tiny homes.

• Participation by large employers to help address lack of affordable housing for their workforce.

Survey respondents rated rehabilitation of affordable rental housing/apartments, senior housing, and housing for people with disabilities as top housing needs (see Figure 11).

Discussion

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a) Introduction

This section reviews housing costs and affordability in the Gastonia Consortium. The median home value there is estimated at \$125,100 according to 2011-2015 ACS data, up from the 2005-2009 ACS estimate of \$115,300 (see Table 32). Median rent is relatively modest at \$543, also up from the 2005-2009 estimate. ACS data shows that 53% of the Consortium's rental units have rents between \$500 and \$999 per month, and 43% rent for under \$500 per month. Rental rates are \$1,000 or more for about 4% of units.

Figures 12 and 13 show similar data for the city. Home values in Gastonia stagnated during the years following the Great Recession but have since increased more rapidly. Rents in the city have also increased more rapidly in recent years. Median rent is \$643, a 19% increase since 2009.

Affordable housing improvement or construction, particularly for households with incomes under 30% AMI, is the most commonly identified issue in the Gastonia Consortium. Housing affordability is often an especially acute issue for people who are homeless, people with disabilities, people living with HIV/AIDS, seniors, and people re-entering the community from long-term care facilities or other institutions.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	0	0	0%
Median Contract Rent	0	0	0%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	12,025	42.7%
\$500-999	15,041	53.4%
\$1,000-1,499	742	2.6%
\$1,500-1,999	95	0.3%
\$2,000 or more	249	0.9%
Total	28,152	99.9%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	3,178	No Data
50% HAMFI	12,931	9,416
80% HAMFI	22,958	21,023
100% HAMFI	No Data	27,310
Total	39,067	<i>57,74</i> 9

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

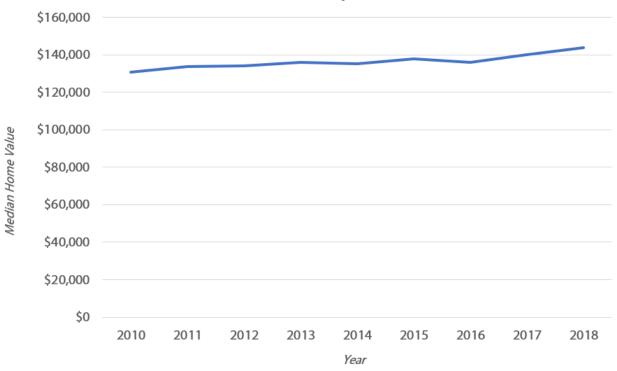
Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	875	897	1,028	1,388	1,779
High HOME Rent	875	897	1,028	1,302	1,433
Low HOME Rent	691	740	888	1,027	1,146

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

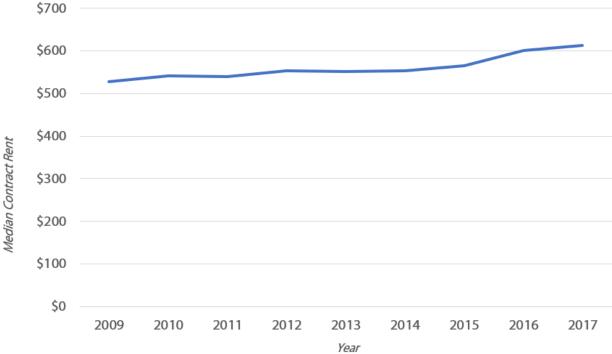




Source: American Community Survey 5-Year Estimates, 2004-2010 to 2014-2018

Median Home Value, City of Gastonia, 2010-2018





Source: American Community Survey 5-Year Estimates, 2005-2009 to 2013-2017

Median Contract Rent, City of Gastonia, 2009-2017

Is there sufficient housing for households at all income levels?

Table 34 estimates the number of units affordable to renters and owners in the Gastonia Consortium at a variety of income levels. This data can be compared to the number of households at each income level, as provided in Table 6 of the Needs Assessment.

According to CHAS estimates, there are 8,600 renter households with incomes under 30% HAMFI in the county but only 3,178 rental units affordable at that income level (see Table 34). Thus, there is insufficient rental housing for households with very low incomes. There appears to be a sufficient number of renter units affordable to renter households at the other income levels. However, these figures do not take into account unit condition or size; nor do they reflect the possibility that a unit that would be affordable to a low or moderate income household may be unavailable to them because it is occupied by a higher income household.

Turning to owners, there are an estimated 5,935 owner households with incomes 50% HAMFI and below in the city, but only 4,150 owner-occupied housing units affordable at that income level (see Table 34). At the next income levels there appear to be adequate affordable units. As with rental housing, these figures do not take into account housing size or condition, or the possibility that higher income households will choose to occupy lower cost units.

The National Low Income Housing Coalition's *Out of Reach* data examines rental housing rates relative to income levels for counties and metro areas throughout the U.S. using HUD Fair Market Rents. Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market. To afford a two-bedroom rental unit at the Gaston County FMR of \$1,028 without being cost-burdened would require an annual wage of \$41,120. This amount translates to a 40-hour work week at an hourly wage of \$19.77, a 109-hour work week at minimum wage, or a 64-hour work week at the county's mean renter wage of \$15.29. To afford a three-bedroom unit at the FMR of \$1,388 would require an annual wage of \$55,520.

How is affordability of housing likely to change considering changes to home values and/or rents?

Table 32 shows that the median home value in the Gastonia Consortium increased by 8% from the 2005-2009 ACS to the 2011-2015 ACS, and median rent increased by 7%. In the city of Gastonia, while home values and rents stagnated in the period following the Great Recession, both have increased more rapidly in recent years (see Figures 12 and 13). Affordability has, in turn, decreased, particularly for renters. A tight rental market, a lack of affordable, decent for-sale housing, and slow wage growth all indicate that housing affordability is likely to continue as an issue.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Table 35 above shows HUD Fair Market Rents and HOME rents for Gaston County (as part of the Charlotte-Concord-Gastonia metro area). The Consortium's median contract rent of \$543 is below the FMR and HOME rents for all unit sizes. As of the 2011-2015 ACS data, the large majority of rental units in the Gastonia Consortium had rents under \$1,000, which falls under the FMR and HOME rents for two, three, and four-bedroom units. These figures suggest that housing choice voucher holders would be able to access a variety of units, given the share of housing renting for less than FMRs. However, market rents have likely increased since the 2011-2015 ACS. Additionally, many lower-income families with children may require larger, more expensive units. Stakeholder input indicates that landlords' refusal to accept vouchers, poor credit histories, and past evictions can also be barriers.

Note that this data does not reflect housing condition, which is an important consideration. While the rent may be affordable, substandard housing conditions may make a unit unsafe or lead to exceptionally high utility costs, negating any savings in rent as compared to a more expensive unit.

Discussion

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a) Introduction

This section examines the condition of housing in the Gastonia Consortium, including the presence of selected housing conditions: 1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. This section also examines the age of housing stock, vacancy rate and suitability of vacant housing for rehabilitation, and the risk of lead-based paint hazards.

Renters in the Gastonia Consortium are more likely than owners to experience one or more of the selected housing conditions. About 52% of renter-occupied units and 23% of owner-occupied units have at least one of the conditions described above (see Table 36). CHAS data discussed in the Needs Assessment indicates that cost burdens are by far the most common housing condition. About 22% of owner-occupied units in the county have one selected condition (11,859 units), and 1% have two or more selected conditions (366 units). In contrast, 48% of renter-occupied units have one condition (13,530 units), and 4% have two or more conditions (1,235 units). These figures indicate that rental units are more likely to be physically substandard (i.e., lack a complete kitchen or plumbing). Less than 1% of both renter- and owner-occupied units have three or more conditions (125 renter-occupied units and 40 owner-occupied units).

Age of housing reflects periods of development in the Gastonia Consortium. The area contains a significant supply of housing built prior to 1980, of which 27,119 units are owner-occupied (50% of owner-occupied units) and 16,561 are rental units (59% of rental units) (see Table 37). One-half (50%) of owner-occupied units and 41% of rental units were built in 1980 or later. Renters are more likely than owners to occupy housing built between 1950 and 1979, while owners are more likely to occupy the newest housing, built in 2000 or later. While some older units may be well-maintained, the considerable share of housing built prior to 1980 indicates potential need for rehabilitation assistance.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation:

For the purpose of this Consolidated Plan, the City of Gastonia defines units to be in "standard condition" if they meet HUD Section 8 housing quality standards. A unit is defined as "substandard" if it lacks complete plumbing, a complete kitchen, or heating fuel (or uses heating fuel that is wood, kerosene, or coal). A unit is "substandard but suitable for rehabilitation" if it lacks complete plumbing, a complete kitchen or a reliable and safe heating system but has some limited infrastructure that can be improved upon. These units are likely to have deferred maintenance and may have some structural damage such as leaking roofs, deteriorated interior surfaces, and inadequate insulation. They may not be part of public water or sewer systems but have sufficient systems to allow for clean water and adequate waste disposal.

Condition of Units

Condition of Units	Owner-	Occupied	Renter	-Occupied
	Number	%	Number	%
With one selected Condition	11,859	22%	13,530	48%
With two selected Conditions	326	1%	1,100	4%
With three selected Conditions	40	0%	105	0%
With four selected Conditions	0	0%	20	0%
No selected Conditions	42,100	77%	13,425	48%
Total	54,325	100%	28,180	100%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-	Occupied	Renter-Occupied		
	Number	Number %		%	
2000 or later	10,896	20%	2,938	10%	
1980-1999	16,304	30%	8,695	31%	
1950-1979	20,625	38%	12,341	44%	
Before 1950	6,494	12%	4,220	15%	
Total	54,319	100%	28,194	100%	

Table 34 - Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied Renter-Occup		Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	27,119	50%	16,561	59%
Housing Units build before 1980 with children present	6,919	13%	4,395	16%

Table 35 - Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

Community input from local stakeholders and residents indicates substantial need for owner-occupied housing rehabilitation. About 56% of survey respondents rated "help for homeowners to make housing improvements" as a high need in the city, and 31% rated it as a moderate need. Stakeholders and focus group participants interviewed in the course of this planning process also emphasized a need for homeowner rehabilitation, connecting people with home rehab loans, and continued education about home maintenance for first-time homebuyers. Data regarding housing conditions indicates that 366 owner-occupied units (about 1% of total owner-occupied units) in the Gastonia Consortium have at least two housing conditions, which are likely to include cost burdens and one other condition (overcrowding, lack of complete kitchen, or lack of complete plumbing). Additionally, 6,494 owner-occupied housing units (12% of total owner-occupied units) in the county were built before 1950, indicating the highest risk for deferred maintenance and rehabilitation need. Thirty-eight percent of owner-occupied housing (20,625 units) in the Consortium were built between 1950 and 1980, and as this housing ages, maintenance needs will continue to grow.

Owners are less likely to lack complete kitchens or plumbing and therefore are less likely to live in substandard housing. However, housing age indicates that some owner-occupied units are at risk of deferred maintenance and may currently or in the near future be in need of some rehabilitation, given that 27,119 units (50% of total owner-occupied units) were built prior to 1980. Additionally, seniors living on Social Security or retirement income who have paid off their mortgages may now be unable to afford necessary repairs and maintenance as their homes age.

Results of public participation efforts and data on the county's housing stock also indicate a high level of need for rehabilitation of rental units. About 72% of survey respondents rated "rehabilitation of rental housing" as a high need, and 19% rated it as a moderate need. Fifteen percent (15%) of rental housing (4,220 units) in the Consortium were built before 1950, and 12,341 units were built between 1950 and 1980 (44% of rental units). Further, a greater number of rental units (1,225) than owner units (366) have at least two housing conditions, likely including cost burdens and at least one other housing condition. Combined, these factors indicate that while there is a high level of need for rehabilitation of both renter- and owner-occupied housing, renters in the Gastonia Consortium experience the highest levels of need.

Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health, and exposure to lead may cause a range of health problems for adults and children. The major source of lead exposure comes from

lead-contaminated dust found in deteriorating buildings, including residential properties built before 1978 that contain lead-based paint.

Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. However, risk factors for exposure to lead include housing old enough to have been initially painted with lead-based paint (i.e., pre-1978), households that include young children, and households in poverty. Table 38 identifies the total number of housing units built before 1980 and the total number of renter and owner units built before 1980 that house children under age 6. In the Gastonia Consortium, this includes 6,919 owner-occupied units (13% of total owner-occupied housing units) and 4,395 renter-occupied units (16% of total renter-occupied housing units) with at least two risk factors for exposure to lead-based paint (built before 1980 and housing young children).

Discussion

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

This section provides a summary of the public and assisted housing available throughout the Gastonia Consortium. While the HUD-required portion of this section focuses on public housing and Housing Choice Vouchers (HCVs), other types of subsidized and assisted housing, particularly Low Income Housing Tax Credit (LIHTC) developments, are important components of the Consortium's affordable housing stock.

Totals Number of Units

				Program Type					
	Certificate	Mod-Rehab	Public			Vouche	rs		
			Housing	Total	Project -based	Tenant -based	Specia	al Purpose Vouch	er
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers									
available			496	1,255			0	0	250
# of accessible units									
*includes Non-Elderly Disabled.	Mainstream	One-Year Ma	ainstream Fiv	e-vear and Nu	sing Home Trai	nsition			

Table 37 - Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are also about 56 LIHTC properties with approximately 1,580 affordable units in Gaston County. These are not required to be physically inspected by HUD, but several small properties with about 100 units combined were built in 1990 or earlier, meaning that they may be facing maintenance or physical improvement needs due to age.

Public Housing Condition

Public Housing Development	Average Inspection Score
Flowers Court Apartments, Belmont Housing	48
Authority	
Holly Hills Apartments, Statesville Housing	68
Authority	

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

GHA converted its public housing units – about 400 units in the Weldon Heights, Mountain View, and Linwood Terrace communities – to project-based Section 8 vouchers under the RAD program in order to leverage additional funds for property improvements. As identified under GHA's most recent PHA 5-Year Plan, goals for restoring and revitalizing these properties included:

- Using capital funds and other available funding to modernize units;
- Performing an energy audit;
- Replacing water and sewer infrastructure and Weldon Heights and Mountain View; and
- Implementing and promoting a maintenance and preventative plan study.

Describe the public housing agency's strategy for improving the living environment of lowand moderate-income families residing in public housing:

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MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

This section summarizes homeless facilities and services. It was completed with data from the Gaston Lincoln Cleveland Continuum of Care, including the 2019 Housing Inventory Count.

Based on a review of emergency, transitional, and permanent supportive housing that serves persons experiencing homelessness in Gaston and Lincoln Counties, there are an estimated 225 year round emergency shelter beds, about 62% of which are adult-only beds (139 beds) and about 36% of which are family beds (81 beds). The counties' homeless facilities also include 53 transitional housing beds and 243 permanent housing beds, including 144 permanent supportive housing beds and 99 rapid rehousing beds.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and					
Child(ren)	81	27	17	90	0
Households with Only Adults	139	0	36	54	0
Chronically Homeless Households	0	0	0	0	0
Veterans	4	0	0	2	0
Unaccompanied Youth	5	0	10	0	0

Table 39 - Facilities Targeted to Homeless Persons

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

There are a variety of mainstream services that are used to complement targeted services for people experiencing homelessness. The Continuum of Care focuses on supporting coordination and collaboration among these systems so that people experiencing homelessness can access mainstream resources to assist them in transitioning to and remaining stable in permanent housing. Examples of health, mental health, employment, and other services that complement services targeted to people experiencing homelessness include:

- The Gaston Workforce Development Board provides job listings, job search and life skills classes, a computer lab with staff assistance, resume preparation assistance, skills assessments, GED and high school completion, occupational skills training, and literacy skills.
- Gaston Family Health Services offers behavioral health services, medical services, dental services, medication assisted treatment for substance use disorders, pharmacy services, schoolbased health services, and a variety of supportive services and programs.
- Gaston County Children and Family Services Division provides in-home services, intensive family
 preservation services, intensive reunification services, community social work assistance,
 including teaching and providing assistance with managing household budgets, planning
 nutritious meals, teaching child rearing practices, providing supportive help in the area of good
 health practices, and providing limited transportation for medical or therapy appointments.
- The City of Gastonia provides homebuyer education, down payment and closing cost assistance, and credit and budget review.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Services and facilities that meet the needs of persons experiencing homelessness include:

- Gastonia and Gaston County are home to several organizations that provide emergency and transitional housing for people experiencing homelessness. The Salvation Army and Family Promise of Gaston County provide emergency housing, and Flynn Fellowship Home of Gastonia and Alternative Community Penalties Program, Inc. provide transitional housing.
- A limited number of organizations provide services to support people experiencing homelessness in transitioning to permanent housing, including permanent supportive housing and rapid rehousing services. Permanent supportive housing and Rapid Re-Housing providers serving the CoC counties include Family Promise of Gaston County and Reinvestment in Communities. A total of 144 permanent supportive housing beds and 99 Rapid Re-Housing beds exist within the Gaston Lincoln Cleveland Continuum of Care.

- Limited resources exist regarding transitional and permanent housing opportunities for veterans and their families in Gastonia and Gaston County. Reinvestment in Communities provides 2 beds through tenant-based rental assistance for veterans, and ABCCM provides 49 Rapid Re-Housing beds for veterans within the CoC counties.
- A limited number of emergency shelters focus services on unaccompanied youth, including With Friends, Inc., which provides 5 beds for unaccompanied youth in Gastonia, and Sisters of Mercy, which provides 10 youth transitional housing beds in Belmont, Gaston County.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d) Introduction

This section describes the housing and social service needs of the city's special populations including the elderly, frail elderly, people with disabilities, residents with diagnosis of HIV/AIDS, residents with substance abuse and mental health issues, and victims of domestic violence.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The Elderly and People with Disabilities

The elderly and people with disabilities need housing that provides access to transit or transportation services in order to facilitate access to employment, resources, and services. These needs should be primary considerations in the location of supportive housing for people with disabilities and seniors. Housing should also focus on integrating these populations into the community and reducing social isolation through programming and facilitating access to resources and services. In addition to housing located near transportation and needed services, people with intellectual and developmental disabilities often need case management or life skills programming that does not violate direct service requirements.

People with Alcohol or Other Drug Addictions

People with alcohol or other drug addictions may have a need for screening, diagnosis, and assessment; treatment; and recovery supportive services, including clinical case management; housing and transportation assistance; mental health services; family engagement; behavioral therapy; and vocational and education, childcare, financial, and health services (Rural Health Information Hub. Treatment and Recovery Support Services).

People Living with HIV/AIDS

Persons living with HIV/AIDS need low-barrier housing free from requirements such as those surrounding drug testing, sobriety, criminal background, and medical appointments. A 'Housing First' model, in which housing is provided without these kinds of barriers, increases access to housing and reduces risk of homelessness for people living with HIV/AIDS. Similar to other vulnerable populations, people living with HIV/AIDS need housing that provides easy access to health services, resources, and employment. This population may need case management services; however, the Housing First model emphasizes that supportive services should not be required for people living with HIV/AIDS to access housing.

Public Housing Residents

Public housing residents may have a need for supportive services such as access to childcare and afterschool programs, transportation to and from these and other services and employment, health services, access to fresh and affordable food, and workforce development and training services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Supportive housing is frequently a need for people with mental health and substance abuse disorders after being discharged from inpatient treatment in order to prevent homelessness. Persons returning from these institutions need access to affordable housing and health services and may also require supportive services such as case management and transportation assistance.

Reinvestment in Communities administers Shelter Plus Care, a Housing Choice Voucher program with an emphasis on housing homeless individuals and families. The program includes grants for rental assistance, in combination with supportive services from other sources, to assist hard-to-serve homeless persons with disabilities (U.S. Department of Housing and Urban Development. Shelter Plus Care). Reinvestment in Communities partners with Partners Behavioral Health Management, a mental health service provider, to provide supportive housing for homeless individuals and families.

Supportive services are available outside of supportive housing programs. For example, Gaston Family Health Services offers behavioral health services, medical services, dental services, medication assisted treatment for substance use disorders, pharmacy services, school-based health services, and a variety of supportive services and programs. Gaston Workforce Development Board provides employment services and preparation, education support, and computer lab access. Local service providers are well-networked and often make referrals to one another to provide shelter, temporary food, clothing, and other immediate services.

Persons returning from mental and physical health institutions also need access to housing that is affordable, close to needed health services, and accessible to transportation options. The use of funds such as those provided through the HOME program to support the development of affordable housing that provides access to services and transportation facilitates persons with mental and physical health challenges in accessing needed care and resources and supports the use of in-home services.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Over the next year, Gastonia will undertake activities related to homeowner housing rehabilitation, first time homebuyer down payment and closing cost assistance, and tenant-based rental assistance, which

may assist seniors, people with disabilities, and other special needs groups, along with other incomeeligible households. The City also plans to undertake public facility/infrastructure improvements, which may also assist senior, disabled, or other special needs residents.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment

The City of Gastonia completed an Analysis of Impediments to Fair Housing Choice (AI) covering the city and county in 2019. Part of that analysis included an examination of the city's zoning code and other public policies that impact housing affordability and fair access to housing. Fair housing barriers included:

- 1. Affordable housing needs that disproportionately impact protected classes;
- 2. Uneven access to opportunity;
- 3. Racial disparities in access to homeownership;
- 4. Limited housing options for people with disabilities; and
- 5. Need for continued and expanded fair housing activities.

The AI found that about 42% of households in the city and 34% in the county have one or more housing needs (cost burden, overcrowding, or lack of complete kitchen or bath facilities). In both Gastonia and Gaston County, households of color are 1.7 times more likely than white households to have a housing need. The zoning ordinance review identified factors that may impact housing cost / affordability in the city. Under the city's current Unified Development Ordinance (UDO), low density multifamily development is permitted by right in most mixed-use zones, but medium and higher density requires additional administrative and public hearing processes for approval through conditional use zoning or variances, which can impose higher costs on development and may artificially and unreasonably affect the feasibility of developing affordable and low-cost housing within the city. The AI noted that multifamily density and height standards could be increased by right instead of requiring conditional use or variance for approval.

The AI described additional ways the City of Gastonia could amend its UDO to reduce housing costs, noting that, "as land costs increase the City could consider lowering the minimum lot size requirements and removing the conditional permit approval process for two-family and multi-family housing developments in some districts and instead rely on a less time-consuming and less expensive administrative site plan review process to maintain oversight." It also identified an opportunity to expand the affordable housing supply by permitting accessory dwelling units for rent, especially in low-density, large-lot areas where they could be easily accommodated. The City's land use regulations could also go further to incentivize the development of affordable housing through inclusionary zoning policies.

The AI also specifically considered access to housing, including affordable housing, for people with disabilities. It noted that Gastonia's UDO restricts transitional housing facilities (defined as ones that provide support services, such as counseling, on an ongoing basis to up to twelve residents to assist with needs such as homelessness, employment, health and behavioral matters, and life skills) to commercial and industrial zones (C-2, C-3, and IU zones), thereby excluding them from residential zones. The AI found that this restriction could limit housing options and have a disproportionate impact on people with disabilities, people of color, families with children, or other protected groups.

In addition to the affordable housing barriers discussed in the Analysis of Impediments, public input for this Consolidated Plan also identified public policies that inhibit affordable housing and residential development. Stakeholders note that current City regulations prohibit new shelters within Gastonia city limits, but this is where transportation and other services that homeless residents rely on are most available. The Salvation Army is considering a new location that could provide expanded shelter space, but the impact of current zoning regulations on this move is unknown. Stakeholders also noted the potential for increased rental housing costs and higher property taxes around the FUSE development, which could decrease affordability for both renters and owners.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

This section outlines the employment, labor force, and educational attainment data that informs the Consolidated Plan's priorities and goals. Figures shown are for the city of Gastonia only.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	70	0	0	0	0
Arts, Entertainment, Accommodations	4,018	4,897	14	15	1
Construction	1,543	1,301	6	4	-2
Education and Health Care Services	4,625	9,988	17	30	13
Finance, Insurance, and Real Estate	1,505	1,424	5	4	-1
Information	593	458	2	1	-1
Manufacturing	5,246	5,364	19	16	-3
Other Services	906	978	3	3	0
Professional, Scientific, Management Services	2,112	1,130	8	3	-5
Public Administration	0	0	0	0	0
Retail Trade	4,345	6,412	16	19	3
Transportation and Warehousing	1,301	311	5	1	-4
Wholesale Trade	1,650	673	6	2	-4
Total	27,914	32,936			

Table 40 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	35,444
Civilian Employed Population 16 years and over	31,115
Unemployment Rate	12.19
Unemployment Rate for Ages 16-24	36.23
Unemployment Rate for Ages 25-65	7.97

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	5,610
Farming, fisheries and forestry occupations	1,500
Service	3,560
Sales and office	7,950
Construction, extraction, maintenance and	
repair	1,965
Production, transportation and material moving	2,575

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	20,199	68%
30-59 Minutes	8,450	29%
60 or More Minutes	995	3%
Total	29,644	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	2,665	715	2,275
High school graduate (includes			
equivalency)	6,255	1,040	2,895
Some college or Associate's degree	9,460	833	2,510
Bachelor's degree or higher	7,120	394	1,294

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25-34 yrs	35-44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	245	280	459	909	1,103
9th to 12th grade, no diploma	1,195	830	1,069	2,090	1,203
High school graduate, GED, or					
alternative	2,434	2,439	2,369	5,380	2,930
Some college, no degree	1,949	2,495	2,534	4,405	2,115
Associate's degree	310	724	779	1,870	747
Bachelor's degree	350	1,663	1,840	2,695	1,298
Graduate or professional degree	22	417	865	1,360	568

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	69,568
High school graduate (includes equivalency)	107,473
Some college or Associate's degree	92,623
Bachelor's degree	185,642
Graduate or professional degree	207,637

Table 46 - Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The employment sectors in Gastonia with the largest numbers of jobs are education and health care services (9,988 jobs or 27% of all jobs); retail trade (6,412 jobs or 17%); manufacturing (5,364 jobs or 15%); and arts, entertainment, and accommodations (4,897 jobs or 13%).

The jobs in which the most city residents are employed reflect these major employment sectors. The largest numbers of Gastonia residents are employed in manufacturing (5,246 workers or 17% of all workers); education and health care services (4,625 workers or 15%); retail trade (4,345 workers or 14%); and arts, entertainment, and accommodations (4,018 workers or 13%).

The largest mismatch between the share of workers (i.e., employed residents) and the share of jobs by sector is in education and health care services (12 percentage point difference in the share of workers and the share of jobs), as education and health care workers make up a much smaller proportion of workers living in the city of Gastonia than do education and health care jobs of city's jobs. This difference indicates that a large proportion of jobs in the education and health care sector in Gastonia are filled by workers commuting into the city from other locations. Differences between the share of workers and share of jobs by sector are 4 percentage points or less in all other sectors.

Describe the workforce and infrastructure needs of the business community:

The Prosperity for Greater Charlotte Comprehensive Economic Development Strategy (2017-2022) identifies needs related to workforce and business infrastructure. Workforce development and infrastructure goals identified in the CEDS include:

Workforce Development

- Improve K-12 education by promoting increased government funding.
- Focus on workforce preparedness.
- Develop regional system for promoting and tracking career pathway training and attainment.
- Promote educational opportunities for defined career paths in high-growth industries.
- Develop an outreach campaign targeting middle and high school students that promotes middle-skill career opportunities.
- Develop materials that promote the value of universal career pathway systems.
- Promote a diverse workforce by attracting talent and creating a more inclusive environment.
- Support and encourage the formation and expansion of multi-national cultural groups, networks, organizations and schools.
- Create materials that explain how cultural outreach and inclusion can benefit businesses in the region.
- Support communication campaigns, through webpages and CEDC quarterly newsletter, that promote career opportunities and the requisite training to K-12 students, university graduates and adult workers.
- Continuously promote workforce initiatives that align education options with in-demand occupations.
- Reach out to local businesses and use networks like chambers of commerce, trade groups and human resources to identify specific workforce shortages and incumbent workforce training needs.
- Develop communication materials to advocate for incumbent workforce resources with state and federal agencies.
- Strengthen employer educator communications and partnerships
- Unite entities behind a shared vision to expand and improve entrepreneurship, including political leadership, aligned resources across the region, and an effort to facilitate startups.

- Continue to strengthen air and rail distribution assets, including access to NC Ports.
- Support site inventory development by providing technical assistance for cities, towns and counties and creating associated webpage(s).
- Develop an annual publication and workshops updating stakeholders on funding mechanisms.
- Facilitate funding and investment by creating webpage and utilizing CCOG services.
- Convene workshops to facilitate collaboration between natural gas providers, planners and developers and to promote improvements to broadband access in underserved areas.
- Convene regional workshops to educate stakeholders on the value of regional approaches to transportation.
- Maintain and distribute current information on the development of all transportation modes, including rail and air.
- Significantly improve how people travel throughout the region from walkable streets and bike
 trails within municipalities to enhanced highway and rail transit for commuters and overall
 connectivity.
- Promote alignment of economic development with regional transit projects.
- Assess current and future housing availability and its alignment with future growth and employment patterns.
- Assess housing affordability near employment centers and existing infrastructure.

Infrastructure

Community stakeholders also noted the need for workforce training and job creation. Fifty-nine percent (59%) of survey respondents described employment training as a high need, and 70% rated incentives for creating jobs as a high need.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Gaston Economic Development Strategy Committee identified the following indicators of rapid growth in Gaston County in its 2019 report to the Gaston County Board of Commissioners (Gaston Economic Development Strategy Committee. (2019). Report to the Gaston County Board of Commissioners):

- CaroMont Health's proposed capital investment of \$325M over next five years, including a new hospital in Belmont.
- Formally adopted plan to extend light rail rapid transit to Gaston County.
- Warlick Family YMCA completed.
- \$250M Gaston County School Bond referendum overwhelmingly approved.

- FUSE District progress.
- Charlotte (CLT) Airport continued expansion.
- Gaston County CLT Airport Connected Economic Positioning Strategy adopted.
- River District development in West Mecklenburg underway.
- TechWorks of Gaston County completed and operating.
- Sonic Automotive back office operation in Lowell opened.
- I-85 widening and Wilkinson Boulevard bridge improvements proceeding.
- Significantly improved perception of Gaston County within region.

While Gaston County's growth is accelerating, the report notes that the county continues to rank poorly on key economic indicators, including employment growth rate, median household income, and health indicators. The county's low rankings indicate a need to attract jobs with family-sustaining wages and to ensure that residents are trained and connected to these high-quality jobs.

In addition to accelerating growth in the county, several other factors shape economic development in the region. The Prosperity for Greater Charlotte Comprehensive Economic Development Strategy (2017-2022) identifies lagging transportation infrastructure that inhibits workers' ability to commute, an overall lack of funding for public education, limited access to venture capital and public funding for startups, and a lack of civic leadership and coordination as continuing threats to job and business growth in the region. These continuing threats create a need for investments in public education and workforce development, transportation infrastructure, and support for small business development.

Affordable housing, including housing near job centers, is also an increasingly important component to supporting workforce and business attraction and retention. Stakeholders interviewed as part of this planning process emphasized the need for affordable housing that is close to jobs, resources, and transportation, including a need for a variety of housing types and sizes. This housing is of particular need for seniors, people with disabilities, people transitioning from homelessness, and people living with HIV/AIDS. With increasing demand for housing in the city and region, affordable housing close to jobs, resources, and transportation is becoming more difficult to find, and low-income residents are often unable to access areas of higher opportunity or are displaced by rising housing costs. Rising housing costs and a lack of quality affordable housing stock are also a primary contributor homelessness in the city. To that end, there is a growing need to devote resources to the development of affordable housing with access to jobs, services, and transportation.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The Prosperity for Greater Charlotte Comprehensive Economic Development Strategy (2017-2022) emphasizes the following strengths and weaknesses of the region's workforce and education systems.

Strengths

- A growing young professional population, strong community colleges and four-year universities, apprenticeship programs, career academies in select high schools and improving employer educator partnerships are important building blocks for a skilled and relevant workforce.
- Inconsistent, underfunded and underperforming K-12 education in some parts of the region is a serious hindrance.
- Lack of employer-educator coordination persists even though improvements have been made including sector partnerships.
- There is also a limited understanding and awareness of technical and apprenticeship programs.
- Improve K-12 education by promoting increased government funding as well as focusing on workforce preparedness and stronger employer educator communications and partnerships.

Weaknesses

Needs

As detailed in the business activity table, a significant gap exists with regard to the number and proportion of jobs available in education and healthcare in Gastonia and the number and proportion of the city's residents employed in that sector, indicating potential gaps in residents' skills and/or education to fill available positions. The Prosperity for Greater Charlotte Comprehensive Economic Development Strategy lists 'health' as a targeted industry cluster, among others including advanced manufacturing, financial services, logistics and distribution, and information technology. Workforce development programs should targeted to provide skills and connections to positions in these targeted sectors, which were selected based on employment growth in the region and the U.S., existing presence in the region, suitability to the region's assets, and alignment with the region's goals and values.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Gaston County Workforce Development Board funds education and training to ensure individuals have skills necessary to find jobs with family-sustaining wages and meet the workforce needs of regional employers. Workforce training initiatives include:

- Job listings
- Job search and life skills classes
- Computer lab with staff assistance
- Resume preparation assistance
- Skills assessments
- GED and high school completion
- Occupational skills training and literacy skills

- Youth services, and
- Business services

NCWorks Career Centers in Gaston County provide resume preparation, career development and specific skills training, job fairs, connections to employers, interview sites, and skills training.

Gaston County Schools provides career and technical education and connects students with internships. Local colleges and universities, including Gaston College and other educational institutions provide a variety of types of education and training to increase the skills of the region's workforce, including Associate degree programs, continuing education, and online learning.

Programs offered by the Gaston County Workforce Development Board and other workforce development stakeholders closely align with workforce development needs identified in the Consolidated Plan, including providing targeted job skills training and increasing educational quality and attainment.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Gastonia participated in the Prosperity for Greater Charlotte Comprehensive Economic Development Strategy (2017-2022), a plan prepared by the Centralina Economic Development Commission. The strategy serves as the Comprehensive Economic Development Strategy (CEDS) in accordance with the U.S. Economic Development Administration's requirements, and as a guide for policies, programs, and investments to support economic development in the region.

Activities the City anticipates undertaking over the next five years will support several of the strategies listed in the CEDS, including assessing current and future housing availability and its alignment with future growth and employment patterns and assess housing affordability near employment centers and existing infrastructure. The City will also continue efforts with the Gaston County Workforce Development Board to provide job training and employment readiness education.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

HUD defines four types of housing problems: (1) cost burden of more than 30%, (2) more than 1 person per room, (3) lack of complete kitchen facilities, and (4) lack of complete plumbing facilities. The HUD-provided map on the following page shows the share of households within each census tract that have least one of these housing problems.

A concentration of households with housing needs is defined as a census tract where more than 40% of households have at least one housing need. Using this definition, there are several census tracts with a concentration of housing problems clustered in the northern areas of the city Gastonia. Census tracts with high percentages of households with housing burdens are located in areas north of Franklin Boulevard stretching slightly past Interstate 85. According to Figure 14, the racial composition of these census tracts seems to skew predominantly African American. The only R/ECAP designated census tract is also included among this concentration of census tracts with housing problems. Figure 14 also shows strong patterns of disproportionate representation of African American and Hispanic populations in census tracts with high proportions of households with housing problems in other areas of the consortium. Many of these census tracts are also located within the city of Gastonia.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Geographic patterns for people of color residing in the Gastonia Consortium are shown in Figure 15. Concentration is defined as a census tract in which more than 50% of residents are people of color. There are only a few census tracts where the majority of residents are racial and ethnic minorities. Most of these census tracts are concentrated in the northern region of the city of Gastonia, specifically along Franklin Boulevard and Interstate 85. African American residents comprise more than half of the population in these census tracts. Populations of other racial or ethnic minority groups are not significant enough to comprise the majority in census tracts in the Gastonia Consortium

In its fair housing planning guidance, HUD defines racially or ethnically concentrated areas of poverty (RECAP) where more than one-half of the population are people of color and the individual poverty rate is over 40%. There is one RECAP census tract in the Gastonia Consortium, and it is located between Franklin Boulevard and Interstate 85 among the other census tracts comprised of majority African American residents in the northern area of the city of Gastonia.

HUD also identifies CDBG-eligible block groups where there are concentrations of low- and moderate-income families. In this case, HUD defines a concentration as a block group where low- and moderate-income households make up more than 51% of total households in the block group. The city of Gastonia

has 60 block groups where the majority of households have low or moderate income. These block groups comprise approximately 71% of all block groups in the county.

What are the characteristics of the market in these areas/neighborhoods?

As stated previously, there are several census tracts where people of color make up the majority of the population and/or more than 40% of households have one or more housing problems. Data presented below is aggregate data for designated census tracts (314.01, 315, 318, 319, 320, and 332.04) from the 2011-2015 5-Year American Community Survey.

Renter occupied housing units in these areas comprise 51% of the housing stock, substantially higher compared to all of Gaston County where 34% is renter occupied. Approximately 19% of housing units in the selected census tracts are vacant, higher than the 12% vacancy rate for all housing units in Gaston County. Looking at structure type, approximately 69% of the housing units in the designated tracts are single-family. Small multifamily housing (2 to 19 units) comprise 24% and large multifamily properties (20 or more units) constitute 1% of all housing structures. These areas have a larger proportion of multifamily housing than Gaston County overall where the majority (73%) of housing units are single family structures. However, Gaston County has a larger proportion of large multi-family structures (2%).

Age of housing in the designated census tracts is similar to the rest of Gaston County with the majority of housing units built before 1980. Approximately 78% of the housing units in the designated census tracts were built before 1980 compared to 54% of all housing units in Gaston County. Accordingly, Gaston County has a higher proportion of housing units built after 1980. The county has a substantially higher percentage of houses built between 1980 and 1999 (46%) compared to the housing units located in the designated census tracts (22%).

Median rental rates of the designated census tracts range from a high of \$810 to a low of \$614. The median rent of Gaston County is \$731, which is close to the median rent among the designated census tracts (\$712). The difference in home values between the designated census tracts and Gaston County is significant. The percentage of owned units valued below \$100,000 in designated census tracts (75%) is more than double the rate found in Gaston County (35%). Higher valued housing (\$200,000 or above) comprise just 3% of owner-occupied units in designated census tracts compared to 22% of units found in Gaston County. While rents and home prices in designated census tracts are generally lower than in other areas in the county, elevated poverty rates within these tracts mean that households likely face greater difficulty affording housing, even when costs are below county averages.

Are there any community assets in these areas/neighborhoods?

The designated census tracts in the city of Gastonia north of Franklin Boulevard contain Rankin Lake Park, Bradley Community Center, Erwin Center, High School of Technology, and the Gastonia Farmers Market. Compared to other census tracts, there are more community assets in census tract 332.04

which includes Phillips Recreation Center, Southwest Middle School, HH Beam Elementary School, and the Gaston County Health Department.

Are there other strategic opportunities in any of these areas?

Numerous studies and plans have been developed to identify strategic opportunities for specific areas in these designated census tracts. The Franklin Boulevard Corridor Study and Master Plan was created to accommodate future growth and economic vitality for the cities of Gastonia and Lowell. The goal is to integrate the land use, transportation, and urban design elements along the corridor in a manner that fosters redevelopment and improved personal mobility. For the downtown Gastonia area, the study envisions a variety of public improvements, including:

- Creating new multi-use trails that connect the north and south sides of Franklin Boulevard and run through Main Avenue;
- New civic open spaces located along Franklin Boulevard and along the railroad on South
- Street;
- Gateway signage marking the entry into the downtown area from the East and from the West
- on Franklin Boulevard;
- Integrating art galleries and other art amenities, community art center; and
- Enhanced roadway section between South Street and York Street through the addition of a new stamped crosswalk, curbs, flower beds, street light enhancements, a street canopy and a planted median.

In addition to the corridor study and master plan, the City created the West Franklin Boulevard Redevelopment Area Plan to promote economic development, eliminate blight, and stabilize neighborhoods along West Franklin Boulevard.

Several plans have also been developed to improve Downtown Gastonia. These plans include the Downtown Gastonia Master Plan, Downtown Streetscape & Public Realm Plan, and Gastonia Wayfinding Program. Programs like Downtown Beautification implemented by Keep Gastonia Beautiful are also in place to enhance the physical appearance of Downtown by maintaining pedestrian friendly streets and walkways, city parks, and parking lots.

Plans and projects to increase intra- and intercity mobility that impact the designated census tracts have been adopted or are in progress. The Gastonia Greenway Plan expands on 132 miles of existing sidewalk, and approximately 4.6 miles of greenway trails. The city of Gastonia, the city of Lowell, Gaston County are collaborating to implement the Lineberger Connector project that will provide better connectivity between communities in the two cities. The Lineberger Connector project consists of new roadway and a new bridge over Interstate 85.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

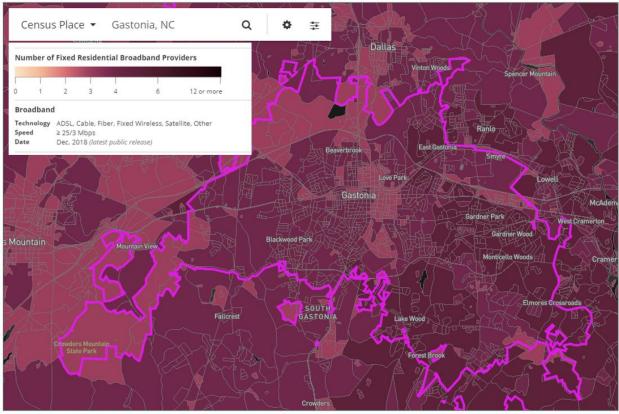
Reliable internet access is increasingly imperative for job searches, primary and secondary education, college and continuing education programs, applying for housing, and apply for and obtaining assistance from various social service agencies. There are three considerations to take into account in assessing internet access, including (1) need for broadband wiring and connections to broadband services; (2) competitive pricing and service resulting from having more than one internet service provider within an area; and (3) affordability of broadband service for low- and moderate-income households.

According to the Federal Communication Commission's database and maps of broadband availability, all city of Gastonia census tracts have three or more service providers offering internet service at download speeds of 25 megabits per second (Mbps) or higher and upload speeds of 3 Mbps or higher, which would be sufficient for most use (see Figure 16). Providers include Charter Communications (cable), ViaSat (satellite), Hughes Network Systems (satellite), and, in some parts of the city, AT&T Fiber. Gastonia's low- and moderate-income census tracts all have access to broadband service.

Despite the availability of several internet providers, affordability may still be a challenge for many low-and moderate-income households, including homeless individuals and families. About one-half of survey respondents (50%) noted that high-speed internet access was a high need in Gastonia, indicating that even if service is available, some residents may have difficulty accessing it in their homes. Gastonia and Belmont offer free public wifi in their downtowns, and internet access is also available at Gaston Library branches.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The city of Gastonia is served by three or more high-speed internet providers, including Charter Communications, ViaSat, Hughes Network Systems, and AT&T. There is not a need for increased competition among broadband Internet service providers.



Map Source: Federal Communications Commission, Fixed Broadband Deployment, https://broadbandmap.fcc.gov/#/

Broadband Service Providers

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The impacts of environmental hazards on low- and moderate-income households is an important consideration for regional planners, city staff, and housing and service providers in Gastonia and the region. In May 2015, Gaston County adopted the Cleveland Gaston Lincoln Regional Hazard Mitigation Plan, which identifies hazards most likely to impact the counties. The plan notes several high-, moderate- and low-risk hazards in Gaston County.

To mitigate environmental hazards in the city of Gastonia, the Cleveland Gaston Lincoln Regional Hazard Mitigation Plan provides a Mitigation Action Plan detailing specific actions by level of priority. The plan describes high-priority actions to address the following hazards in the city of Gastonia:

- Vulnerability to drought/ heat wave
- Vulnerability to wildfire
- Vulnerability to flood
- Vulnerability to winter storms and freezes
- Vulnerability to hurricanes and tornadoes

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The degree to which low- and moderate-income households are vulnerable to increased natural hazards associated with climate change is an important consideration for jurisdictions and regions as they prepare environmental resiliency and other plans. The Fourth National Climate Assessment (2018) notes that vulnerable populations, including lower-income and other marginalized communities, have lower capacity to prepare for and cope with extreme weather and climate-related events. Because these communities are expected to experience greater impacts, it is important that jurisdictions prioritize adaptation actions for the most vulnerable populations (U.S. Global Change Research Program. (2018). Fourth National Climate Assessment). Five-Year 2013-2017 American Community Survey data indicates that:

- Median household income for residents of the city of Gastonia is \$43,985, lower than the state median of \$50,320;
- An estimated 7,929 of the city's 28,097 households (28%) have incomes of less than \$25,000 per year; and
- Nineteen percent (19%) of Gastonia residents were living below the poverty level in the past 12 months, higher than the state level of 16%.

In this way, a large proportion of the city's residents have reduced capacity to prepare for and cope with extreme weather and climate-related events.

HIGH RISK	Winter Storm and Freeze Thunderstorm Wind / High Wind Flood Tornado			
MODERATE RISK	Hailstorm Hurricane and Tropical Storm Drought Lightning Wildfire Nuclear Accident			
LOW RISK	Dam and Levee Failure Hazardous Material Incident Extreme Heat Landslide Earthquake Erosion			

Hazard Risk in Gaston County

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This strategic plan will guide the allocation of CDBG and HOME funding during the 2020-2024 planning period to address Gastonia and the Gastonia Consortium's most critical needs. Goals for the 2020-2024 period focus on high priority needs identified through data analysis, community input, consultation with City staff and other public agencies, and review of relevant recently completed plans and studies. While many topics were discussed by community members in developing this Consolidated Plan, the focus over the next five years will be on affordable housing for renters and homeowners, homeless housing and services, and neighborhood revitalization, including public infrastructure and facility improvements, as well as targeted public services for neighborhood residents. The priority and goal sections of this strategic plan further describe anticipated activities within each of these key areas.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

	ne 47 - Geographiic Priority Areas	
1	Area Name:	Central Gastonia
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Gastonia Consortium
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
_		



General Allocation Priorities

Describe the basis for allocating investments geographically within the state

CDBG funding is allocated to the City of Gastonia for use within the city limits for housing assistance, public services, economic development, and public infrastructure and facility improvements. The Local Target Area shown below includes Gastonia city limits, where 100% of CDBG funds will be spent over the next five years.

HOME funding is allocated to the Gastonia Consortium and administered by the City of Gastonia for use throughout Gaston County, excluding Spencer Mountain and High Shoals and including all of Kings Mountain.

The City will administer CDBG and HOME funds according to HUD regulations, which stipulate that CDBG funding be spent within the city and HOME funds be spent within the Gastonia Consortium (i.e., Gaston County excluding Spenser Mountain and High Shoals but including all of Kings Mountain).

While the City has not designated sub-areas targeted for the use of CDBG funding, the City's 2019 Analysis of Impediments to Fair Housing Choice identified the need to use CDBG funds to improve physical resources and provide public services in high poverty areas of Gastonia. Physical improvements may include sidewalks expansion, addressing unsafe properties, or public facility improvements. Targeted services may include employment readiness/workforce development and youth educational enrichment activities.

In each year covered by this Consolidated Plan, the City will determine CDBG and HOME projects and activities based on a variety of factors including priority needs, eligibility, availability of funds, and readiness to proceed. Emphasis, however, will be placed on improving neighborhood conditions and access to opportunity in high poverty areas and increasing the number of affordable housing units throughout the Consortium.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Develop, Acquire, or Preserve Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities
		Persons with Developmental Disabilities
	Geographic Areas Affected	Central Gastonia
	Associated Goals	Safe and Decent Affordable Housing
	Description	 Support development or rehabilitation/preservation of rental housing affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County. Support development of for-sale housing units affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County.
		 Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs.

	T	
	Basis for Relative Priority	Affordable housing was identified as a priority need by focus group participants, meeting attendees, and interviewees. Community members noted that market-rate rents and home prices are not attainable for many low- and moderate-income households. CHAS data analyzed for this Plan concurs that housing affordability is the most widespread housing need in the Gastonia Consortium. This priority also aligns with the 2019 AI.
2	Priority Need Name	Homebuyer Assistance
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Public Housing Residents Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Central Gastonia
	Associated Goals	Safe and Decent Affordable Housing
	Description	 Provide homebuyer preparation and financial management classes to increase the number of low- and moderate-income households positioned to purchase homes. Increase the number of first-time home buyers through down payment and closing cost assistance.
	Basis for Relative Priority	Stakeholders noted that the City's current Home Buyers Club and Homebuyer's Assistance Programs are quite successful and should be continued. The AI found a gap in homeownership rates and mortgage loan approval rates by race and ethnicity in Gaston County. Homebuyers assistance (and affirmative marketing of this assistance) is one approach to addressing this gap.
3	Priority Need Name	Rental Assistance
	Priority Level	High

		[
	Population	Extremely Low							
		Low							
		Large Families							
		Families with Children							
		Elderly Individuals							
		Families with Children							
		veterans Elderly							
		Frail Elderly							
		Persons with Mental Disabilities							
		Persons with Physical Disabilities							
		Persons with Developmental Disabilities							
		· · · · · · · · · · · · · · · · · · ·							
	Geographic	Central Gastonia							
	Areas								
	Affected								
	Associated	Safe and Decent Affordable Housing							
	Goals								
	Description	 Working with community partners, assist income-eligible renter households 							
		with tenant-based rental assistance.							
		Collaborate with agencies in the CoC and others to assist households at-risk							
		of homelessness with short-term rental payments, utility assistance, rapid							
		rehousing, or other assistance.							
	Basis for	Homelessness prevention was the number one priority identified by community							
	Relative	members who participated in the survey. Continuum of Care members noted that							
	Priority	rental assistance and assistance finding housing for extremely low- and low-income							
		households were priorities for preventing and/or shortening homelessness. CHAS							
		data notes the difficulty many renters in the Gastonia Consortium have affording							
		housing, and the Community Advisory Board cited a need for emergency rental							
		assistance.							
4	Priority Need	Homeless Housing and Supportive Services							
	Name	The medical medianing and supportive services							
	Priority Level	High							

	Population	Chronic Homelessness							
		Individuals							
		Families with Children							
		Mentally III							
		Chronic Substance Abuse							
		veterans							
		Persons with HIV/AIDS							
	Victims of Domestic Violence								
		Unaccompanied Youth							
	Geographic	Central Gastonia							
	Areas								
	Affected								
	Associated	Homeless Assistance and Services							
	Goals	Tromeress / issistance and services							
	Description	Collaborate with agencies in the CoC and others to assist people who are							
		homeless through provision of and access to emergency, transitional, and							
		permanent housing to enable them to move to appropriate housing and							
		achieve greater stability.							
		Collaborate with agencies in the CoC and others to provide access to							
		coordinated support services and case management for people							
		experiencing homelessness.							
	Basis for	Continuum of Care and Citizen Advisory Board members, along with other							
	Relative	stakeholders, identified housing and services for people who are homeless as a key							
	Priority	need in Gastonia. Almost all types of homeless needs (prevention, transitional							
	•	housing, outreach, permanent housing, and a day center) were identified as a high							
		need by survey participants.							
5	Priority Need	Public Improvements/ Neighborhood Revitalization							
	Name								
	Priority Level	High							
	Population	Non-housing Community Development							
	Geographic	Central Gastonia							
	Areas								
	Affected								
	Associated	Demolition and Clearance							
	Goals	Public Improvements							
		Section 108 Loan Program							

	Description	 Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, recreation centers, and parks in income-eligible areas. Assist community service organizations in improving their physical structures to meet goals for serving low- and moderate-income households, people who are homeless, and other special needs populations. Clear, demolish, or remediate structures to prevent blight in low- and moderate-income areas.
	Basis for Relative Priority	Survey respondents identified street/road improvements, sidewalk improvement/expansion, and redevelopment or demolition of blighted properties as high needs in Gastonia. The Citizens Advisory Board and other stakeholders noted the need for continued efforts to improve public facilities and infrastructure in income-eligible areas, and physical improvements in high-poverty areas was a goal of the 2019 AI.
6	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Central Gastonia
	Associated Goals	Public Services
	Description	Fund community services such as youth education enrichment; childcare and transportation assistance; adult education, job training or job search assistance; health, mental health, and substance abuse services; senior programming; and others.

	Basis for	Community members identified the need for a variety of services for income-						
	Relative	eligible and special needs residents. The 2019 AI identified public services such as						
	Priority	educational enrichment, adult education, and job training/job search assistance as						
		goals for high-poverty areas in the city.						
7	Priority Need	Fair Housing Education and Enforcement						
	Name							
	Priority Level	High						
	Population	Other						
	Geographic	Central Gastonia						
	Areas							
	Affected							
	Associated	Fair Housing						
	Goals							
	Description	Conduct fair housing education efforts targeted to members of the public, including those most vulnerable to housing discrimination, and housing professionals, specifically including independent landlords.						
		 Continue the City of Gastonia's fair housing hotline and raise awareness about the City of Gastonia Fair Housing Officer. 						
		 Consider fair housing testing targeted toward identifying rental market discrimination. 						
	Basis for	The 2019 Analysis of Impediments to Fair Housing Choice identified the need for						
	Relative	continued and expanded fair housing education activities for the general public and						
	Priority	housing industry professionals, including independent landlords.						
8	Priority Need Name	Program Administration						
	Priority Level	High						
	Population	Other						
	Geographic Areas Affected	Central Gastonia						
	Associated Goals	Program Administration						
	Description	Program administration costs related to planning and execution of community development, housing, and homelessness activities funded through the CDBG and HOME programs.						

Basis for	Program administration costs associated with the coordination and delivery of
Relative	services to Gastonia and Gastonia Consortium residents.
Priority	

Narrative (Optional)

SP-30 Influence of Market Conditions - 91.415, 91.215(b)

Influence of Market Conditions

Affordable	Market Characteristics that will influence				
Housing Type	the use of funds available for housing type				
Tenant Based	High level of cost burdens among low-income households; waiting lists for assisted				
Rental Assistance	housing units; and need for short-term rental assistance for homeless individuals				
(TBRA)	and families transitioning to permanent housing. Currently, TBRA is provided				
	through HUD's Section 8 Housing Choice Voucher program administered through				
	local housing authorities, with about 1,650 vouchers available administered by the				
	Gastonia Housing Authority. The City plans to incorporate the use of the 24-month				
	TBRA and the security deposit TBRA programs. In addition, it will implement TBRA				
	with deposit assistance through CARES Act funding.				
TBRA for Non-	High level of cost burdens among low-income households, including non-homeless				
Homeless Special	special needs populations; waiting lists for assisted housing units for seniors and				
Needs	people with disabilities. The City intends to continue using HUD funds for short-				
	term (up to 24 months) TBRA over the next five years, which may include				
	assistance for special needs groups.				
New Unit	Age and condition of housing; waiting lists at existing assisted housing				
Production	developments; high occupancy rates and rental rates; sales prices unaffordable to				
	low/moderate income households. The City intends to use HUD grant funding to				
	support new affordable housing development over the next five years.				
Rehabilitation	Age and condition of housing; issues related to substandard housing, especially for				
	low-income renters; need for home repairs for seniors and other homeowners,				
	including lead-based paint remediation. The City may use HUD grant funds for				
	rehabilitation and/or preservation of affordable housing over the next five years.				
Acquisition,	Subsidized housing developments anticipated to age out of their affordability				
including	period; age, condition, and availability of multifamily properties suitable for				
preservation	acquisition/rehabilitation; vacant/hazardous buildings identified through code				
	enforcement. The City may use HUD grant funds for acquisition and/or				
	preservation of affordable housing over the next five years.				
1	1				

Table 49 – Influence of Market Conditions

Table 7 indicates a total of 26,605 households, approximately 32% of all households in the Gastonia Consortium, experience one of the listed housing problems. Data for households experiencing severe housing problems provided in Table 8 show 16% of all households (13,276 households) experience one or more severe housing problems listed.

Housing cost burden is the most common housing problem in the Gastonia Consortium among both renter and owner households. Nearly half (48%) of all households with incomes under 80% HAMFI (HUD adjusted median family income) in the county experience cost burdens. Severe cost burdens affect 4,359 owners and 5,948 renters, or 23% of all households with incomes under 80% HAMFI. For the lowest income households (those with incomes under 30% HAMFI), severe cost burdens are most common, impacting 7,559 of the 14,520 households (52%) at that income level; an additional 2,201 households have a cost burden.

While the primary housing issue facing low- and moderate-income residents are related to affordability, there are other housing needs in the city. Approximately 3% of all households experience overcrowding (or are doubled up) while 2% of all households have zero or negative (no) income. Less than 1% of all households reside in substandard housing or lack complete plumbing and kitchen facilities. Although these percentages pale in comparison to households with cost burdens, the total number of households experiencing problems other than cost burdens amounts to 4,131 or 5% of all households in the Gastonia Consortium.

Outside these four HUD-defined housing problems, other important needs in the consortium are rehabilitation of affordable housing units, senior housing, homelessness prevention services, and transitional and supportive housing programs.

The remainder of this section characterizes local housing needs in more detail. The Market Analysis component of the Consolidated Plan identifies resources available to respond to these needs (public housing, tax credit and other subsidized properties, housing and services for the homeless, and others).

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Gastonia expects to receive a total allocation of \$1,462,735 in HUD grant funds for the 2020 program year, including \$656,830 in CDBG and \$805,905 in HOME grant funds.

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	656,830	2,315	0	659,145	2,364,588	Funding to assist low- and moderate-income neighborhoods and households with housing, services, employment opportunities, and public improvements.

Program	Source	Uses of Funds	Expe	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public -	Acquisition						Funding to assist low- and moderate-
	federal	Homebuyer						income households obtain and maintain
		assistance						safe, decent, and affordable housing.
		Homeowner						
		rehab						
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	805,905	21,344	0	827,249	2,901,258	

Table 50 - Anticipated Resources

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 City of Gastonia will leverage resources through partnerships with local agencies, including nonprofit organizations and for-profit companies, that contribute additional funding and staff time to the projects funded through CDBG and HOME grant money. Over the next five years, Gastonia anticipates satisfying match requirements through a variety of means, such as:

- City of Gastonia funding and other support for Reinvestment in Communities of Gaston County (RIC);
- Local funding provided by the United Way of Gaston County;
- Local funding provided by Continuum of Care member agencies;

- In kind services for new construction and rehabilitation by Habitat for Humanity;
- Waived fees provided by local banks participating in the City's Homebuyers Assistance Program; and
- Grant match funds for public facility and infrastructure projects.

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

CDBG funding may be used to develop public facilities or infrastructure on existing publicly-owned land to benefit low- and moderate-income people or households. Additionally, publicly-owned residential lots may be used to support affordable housing / homeownership opportunities for low- and moderate-income households. If CDBG or HOME grant funds are ever used to acquire property for public purpose, the City will follow acquisition requirements to determine fair market value.

Discussion

In addition to the \$656,830 in CDBG and \$805,905 in HOME grant funds, \$386,391 of CARES ACT Funding (CDBG-CV) was added to the 2019-20 Annual Action Plan as part of the 2015-19 Consolidated Plan.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity	Role	Geographic Area Served
	Туре		
City of Gastonia	Government	Homelessness	Jurisdiction
		Non-homeless special	
		needs	
		Ownership	
		Planning	
		Rental	
		neighborhood	
		improvements	
		public facilities	
		public services	
GASTONIA HOUSING	PHA	Ownership	Jurisdiction
AUTHORITY		Public Housing	
		Rental	
Gaston Lincoln	Continuum of care	Homelessness	Region
Cleveland Continuum of		public services	
Care			
REINVESTMENT IN	CHDO	Homelessness	Jurisdiction
COMMUNITIES OF		Ownership	
GASTON COUNTY		Rental	
Habitat for Humanity of	Non-profit	Ownership	Jurisdiction
Gaston County	organizations		

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Gastonia provides a variety of programs focused on increasing housing affordability and homeownership, providing public services, and improving public facilities and infrastructure. The City has developed strong partnerships with the Gaston Lincoln Cleveland Continuum of Care and nonprofit service providers.

Based on interviews with key stakeholders, focus groups, and a community-wide meeting, gaps in the institutional delivery system include:

• Elected officials are yet to come to the table around affordable housing and homelessness. Even with capable service providers, CDBG funding does not meet homeless needs. Champions (state

- reps, city or county elected officials, etc.) and partners (county, Gaston College, etc.) are needed.
- The City should continue to support the Continuum of Care. It should be more intentional about engaging the Housing Authority, which should be involved in the Continuum of Care.
- Improved collaboration among housing and service providers is a goal. For example, collaboration such that Salvation Army residents are able to secure housing ahead of their last day at the shelter.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Available in the	Targeted to	Targeted to People
-		with HIV
X	X	X
X	Χ	
Χ	Х	
X	Х	
X	Х	
Street Outreach So	ervices	
X	Х	
X	Х	
X	Х	Х
Supportive Serv	rices	
X	Х	
X	Х	
X		
X	Χ	
X	Х	Х
X		Х
X	Х	Х
X	Х	Х
X	Х	
Other		•
X		
	Community Homelessness Prevention X X X X X X Street Outreach Servention X X Supportive Servention X X X X Other X	CommunityHomelessHomelessXXXXXXXXStreet Outreach ServicesXXXXXSupportive ServicesXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXOtherX

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Gastonia partners with the Gaston Lincoln Cleveland Continuum of Care and a variety of agencies and organizations to provide services to people experiencing homelessness. The City of Gastonia uses CDBG funds to support permanent housing and homelessness information management through the Gaston Lincoln Cleveland Continuum or Care. Permanent supportive housing and Rapid Re-Housing providers serving the CoC counties include Family Promise of Gaston County and Reinvestment in Communities. A total of 144 permanent supportive housing beds and 99 Rapid Re-Housing beds exist within the Gaston Lincoln Cleveland Continuum of Care. Additionally, as described in Section MA-30, the Gaston Workforce Development Board, Gaston Family Health Services, Gaston County Children and Family Services Division, and the City of Gastonia provide a variety of services to meet the needs of people experiencing homelessness, including workforce development and employment services, mental and physical health services, and financial and homeownership services.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The City of Gastonia works with its partners in the community to collaborate on projects to ensure that individuals and families who are chronically homeless are housed and provided necessary supportive services. The collaborating agencies will coordinate funding and resources to make additional permanent housing beds available for the chronically homeless community. Efforts include increasing permanent supportive housing and streamlining the assessment and referral process.

The primary gap in the service delivery system for special needs populations is the lack of funding for additional beds and services, particularly for difficult-to-place special needs clients. The lack of long-term affordable and high-quality rental and for-sale housing in the city presents another gap in the service delivery system.

Gaps in the service delivery system discussed by community meeting and focus group participants, survey respondents, and stakeholders interviewed as part of this planning process include:

- Need for more of all housing types to address homelessness emergency shelter, transitional housing, permanent affordable housing (rental and homeownership), and permanent supportive housing.
- There is a need for a day center or one-stop-shop with resources for people experiencing homelessness. The Phoenix day center closed due to lack of funding, so people who are homeless now have no mailing address and nowhere to go during the day.
- There is a lack of emergency shelter and other resources for people that don't meet various
 criteria such as being families with small children, having a mental health or substance abuse
 issue or being a victim of domestic violence.
- There is a need for continued use of a Housing First model, including housing with strong case management and wraparound services to assist people with a variety of challenges, including transportation, school enrollment, and job training.

- Substance abuse and mental health issues are related to homelessness and should be addressed in services offered. A mobile lab could help with mental health issues.
- A diversion program for first time offenders could be explored.
- Past evictions are a major factor preventing people from accessing housing. People experiencing
 homelessness may pay multiple application fees but not be accepted because of eviction
 history. A "rental readiness" course, help with utility arrearages/deposits, and working
 with/incentivizing landlords may help people with past evictions, poor credit history, or other
 potential barriers get into rental housing.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City of Gastonia Housing and Neighborhoods Division will continue working with the Continuum of Care, the Gastonia Housing Authority, the Citizens Advisory Board, City departments, elected officials, banks and lenders, and other local and regional partners to identify strategies for strengthening collaboration and developing new resources to address the identified gaps in service delivery. Expanded services and housing for people who are homeless, possibly to include a day center, are considered priorities for the 2020-2024 Consolidated Plan period. HOME funds will be used in collaboration with local CHDOs to develop additional affordable housing and provide rental assistance, one of the top needs identified for low- and moderate-income groups, as well as homeless and other special needs populations. The City will also continue allocating funds to Continuum of Care members, including funding for HMIS support.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Safe and Decent	2020	2024	Affordable Housing	Central	Develop, Acquire, or	CDBG:	Rental units constructed:
	Affordable				Gastonia	Preserve Affordable	\$1,018,816	30 Household Housing Unit
	Housing				Gastonia	Housing	HOME:	
					Consortium	Homebuyer	\$3,384,179	Homeowner Housing
						Assistance		Rehabilitated:
						Rental Assistance		50 Household Housing Unit
								Direct Financial Assistance to
								Homebuyers:
								275 Households Assisted
								Tenant-based rental
								assistance / Rapid
								Rehousing:
								250 Households Assisted
2	Homeless	2020	2024	Homeless	Central	Homeless Housing	CDBG:	Public service activities other
	Assistance and				Gastonia	and Supportive	\$449,561	than Low/Moderate Income
	Services					Services		Housing Benefit:
								1750 Persons Assisted
								Homelessness Prevention:
								1000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Demolition and	2020	2024	Non-Housing	Central	Public Improvements/	CDBG:	Public Facility or
	Clearance			Community	Gastonia	Neighborhood	\$45,876	Infrastructure Activities
				Development		Revitalization		other than Low/Moderate
								Income Housing Benefit:
								2500 Persons Assisted
4	Public	2020	2024	Non-Housing	Central	Public Improvements/	CDBG:	Public Facility or
	Improvements			Community	Gastonia	Neighborhood	\$868,897	Infrastructure Activities
				Development		Revitalization		other than Low/Moderate
								Income Housing Benefit:
								25000 Persons Assisted
5	Public Services	2020	2024	Public Services	Central	Public Services	CDBG: \$0	Public service activities for
					Gastonia			Low/Moderate Income
								Housing Benefit:
								0 Households Assisted
6	Section 108 Loan	2020	2024	Non-Housing	Central	Public Improvements/	CDBG: \$0	Other:
	Program			Community	Gastonia	Neighborhood		0 Other
				Development		Revitalization		
7	Fair Housing	2020	2024	Fair Housing	Central	Fair Housing	CDBG:	Public service activities other
					Gastonia	Education and	\$42,318	than Low/Moderate Income
						Enforcement		Housing Benefit:
								1750 Persons Assisted
8	Program	2020	2024	Administration	Central	Program	CDBG:	Other:
	Administration				Gastonia	Administration	\$598,265	1 Other
					Gastonia		HOME:	
					Consortium		\$344,328	

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Safe and Decent Affordable Housing						
	Goal Description	 Support development or rehabilitation/preservation of rental housing affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County. 						
		 Support development of for-sale housing units affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County. 						
		 Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitatic and repairs. 						
		 Provide homebuyer preparation and financial management classes to increase the number of low- and moderate- income households positioned to purchase homes. 						
		 Increase the number of first-time home buyers through down payment and closing cost assistance. 						
		Working with community partners, assist income-eligible renter households with tenant-based rental assistance.						
		 Collaborate with agencies in the CoC and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance. 						
2	Goal Name	Homeless Assistance and Services						
	Goal Description	 Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability. 						
		 Collaborate with agencies in the CoC and others to provide access to coordinated support services and case management for people experiencing homelessness. 						
3	Goal Name	Demolition and Clearance						
	Goal Description	Clear, demolish, or remediate structures to prevent blight in low- and moderate-income areas.						

4	Goal Name	Public Improvements							
	Goal Description	 Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, recreation centers, and parks in income-eligible areas. 							
		 Assist community service organizations in improving their physical structures to meet goals for serving low- and moderate-income households, people who are homeless, and other special needs populations. 							
5	Goal Name	Public Services							
	Goal Description	Fund community services such as youth education enrichment; childcare and transportation assistance; adult education, job training or job search assistance; health, mental health, and substance abuse services; senior programming; and others.							
6	Goal Name	Section 108 Loan Program							
	Goal Description	Section 108 Loan Program							
7	Goal Name	Fair Housing							
	Goal Description	 Conduct fair housing education efforts targeted to members of the public, including those most vulnerable to housing discrimination, and housing professionals, specifically including independent landlords. Continue the City of Gastonia's fair housing hotline and raise awareness about the City of Gastonia Fair Housing Officer. Consider fair housing testing targeted toward identifying rental market discrimination. 							
8									
	Goal Description	Program administration costs related to planning and execution of community development, housing, and homelessness activities funded through the CDBG and HOME programs.							

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Using HOME funds, Gastonia anticipates providing affordable housing for about 555 households with incomes at or below 80% AMI over the next five years. This projection includes an estimated 30 low- and moderate-income households assisted through the creation of new affordable

rental housing units, 275 low- and moderate-income homebuyers assisted through funds for down payments or closing costs, and 250 extremely low- or low-income households assisted through tenant-based rental assistance. The City also anticipates assisting approximately 50 homeowners with incomes at or below 80% AMI with home rehab using CDBG funds.

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Gaston Housing Authority (GHA) is not under a Section 504 voluntary compliance agreement. Stakeholder input, however, indicates that there is a continued need for more affordable, accessible housing units in Gaston County, including accessible units that accept Housing Choice Vouchers. About 644 people with a disability are currently housed through HCVs, making up about 18% of the HCV residents, and 30 are housed through public housing, making up 10% of public housing residents. The average household with an HCV in Gaston County waited about 14 months to receive it. For public housing, the average wait time was considerably longer at 32 months.

Activities to Increase Resident Involvements

The Gastonia Housing Authority engages residents and voucher holders in planning efforts through Resident Advisory Boards and provision of community services through the Family Self-Sufficiency Program. For GHA's most recent PHA 5-Year Plan, resident meetings were held at Cameron Courts, Linwood Terrace, and Mountain View to gather suggestions on physical improvements, self-sufficiency needs, and community and resident service activities.

GHA also collaborates with the City of Gastonia's Housing and Neighborhoods Division to connect participants in GHA's Family Self-Sufficiency Program with the City's Home Buyer's Club and Homebuyer's Assistance Program. According to GHA's 2019 Annual PHA Plan, 27 families were participating in the Section 8 Family-Self Sufficiency Program, with 18 saving down payment or other funds in an escrow account and 6 graduating.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

No housing authorities in Gaston County are designated as troubled. GHA is considered a High Performer. Not applicable.

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h) Barriers to Affordable Housing

The City of Gastonia completed an Analysis of Impediments to Fair Housing Choice (AI) covering the city and county in 2019. Part of that analysis included an examination of the cityâ¿¿s zoning code and other public policies that impact housing affordability and fair access to housing. Fair housing barriers included:

- 1. Affordable housing needs that disproportionately impact protected classes;
- 2. Uneven access to opportunity;
- 3. Racial disparities in access to homeownership;
- 4. Limited housing options for people with disabilities; and
- 5. Need for continued and expanded fair housing activities.

The AI found that about 42% of households in the city and 34% in the county have one or more housing needs (cost burden, overcrowding, or lack of complete kitchen or bath facilities). In both Gastonia and Gaston County, households of color are 1.7 times more likely than white households to have a housing need. The zoning ordinance review identified factors that may impact housing cost / affordability in the city. Under the cityâ¿¿s current Unified Development Ordinance (UDO), low density multifamily development is permitted by right in most mixed-use zones, but medium and higher density requires additional administrative and public hearing processes for approval through conditional use zoning or variances, which can impose higher costs on development and may artificially and unreasonably affect the feasibility of developing affordable and low-cost housing within the city. The AI noted that multifamily density and height standards could be increased by right instead of requiring conditional use or variance for approval.

The AI described additional ways the City of Gastonia could amend its UDO to reduce housing costs, noting that, â¿as land costs increase the City could consider lowering the minimum lot size requirements and removing the conditional permit approval process for two-family and multi-family housing developments in some districts and instead rely on a less time-consuming and less expensive administrative site plan review process to maintain oversight.â¿® It also identified an opportunity to expand the affordable housing supply by permitting accessory dwelling units for rent, especially in low-density, large-lot areas where they could be easily accommodated. The Cityâ¿s land use regulations could also go further to incentivize the development of affordable housing through inclusionary zoning policies.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Gastonia's 2019 Analysis of Impediments to Fair Housing Choice identified strategies and related implementation steps the City plans to take over the next five years to remove or ameliorate public policy barriers to affordable housing.

To address the limited supply of affordable housing and its disproportionate impact on households of color, the City will:

- Continue using HOME and CDBG funds to increase and maintain the availability of affordable rental and for-sale housing in the city and county through new construction and rehabilitation, including by working with local Community Housing Development Organizations (CHDOs).
 Consider ways CDBG funding may be used for infrastructure improvements that would enable the development of new affordable rental or for-sale units.
- Review North Carolina's allocation process for Low Income Housing Tax Credits (LIHTCs) to
 identify ways the City may be able to better impact the competitiveness of developers'
 applications, including local nonprofit developers. For developers proposing LITHC projects in
 areas with access to key community resources/opportunity factors or areas experiencing a loss
 of affordable rental units, work with them to increase the competitiveness of their applications
 through letters of support, provision of information, or other assistance.
- Monitor rent levels, home prices, and property taxes in Gastonia neighborhoods at risk for gentrification. As redevelopment occurs, consider ways to encourage the development of mixed-income housing or incentivize the inclusion of affordable housing units.

To address limits on as-of-right higher density multifamily development, the City will:

• Review the City's zoning ordinance and table of permitted uses to consider where allowances for denser as-of-right multifamily development may be made.

To improve housing access and affordability for people with disabilities, the City will:

- Review the City's zoning ordinance and table of permitted uses to consider where allowances for transitional housing facilities may be made within residential zoning districts.
- Draft and adopt local code amendments that would expand transitional housing facility siting
 options and provide an administrative alternative to a variance application for people
 requesting accommodation or modification related to a disability.

In addition to addressing barriers identified in the Analysis of Impediments to Fair Housing Choice, the City will continue funding affordable housing and homeownership opportunities through its CDBG and HOME funds, as well as exploring new models to improve housing access and supportive services for people who are experiencing homelessness.

SP-60 Homelessness Strategy - 91.415, 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

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

The City of Gastonia is an active member of the Gaston Lincoln Cleveland Continuum of Care and funds technical assistance and capacity building for CoC members, including for outreach to homeless persons. The City provides funding to support the CoC's use of Homeless Management Information System, the system for collecting client-level data and assessing individual needs. One of the City's strategic goals for the 2020-2024 Consolidated Plan is to expand the availability of homeless services and housing; activities funded under this priority may include street outreach to unsheltered homeless persons.

Addressing the emergency and transitional housing needs of homeless persons

The Salvation Army will continue providing emergency housing in Gastonia. Over the 2020-2024 Consolidated Planning period, the City anticipates working with Salvation Army as they look for a new location that can provide expanded shelter space. Family Promise will also continue providing emergency shelter for homeless families through a network of local churches. The City may fund facility improvements or services provided by emergency or transitional housing providers over the next five years under the priority of expanding the availability of homeless services and housing.

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.

The City of Gastonia and the Gaston Lincoln Cleveland Continuum of Care support a Housing First model that prioritizes permanent housing and offers case management and other support services. Over the next five years, the City will continue to support the Continuum of Care and homeless service providers that recognize the need to shift focus and resources to long-term, permanent housing in order to end homelessness. In particular, the Gaston Lincoln Cleveland Continuum of Care has prioritized the funding of permanent housing through organizations such as Habitat for Humanity and Reinvestment in Communities (RIC). The City will also fund organizations that provide rapid rehousing, case management, and housing navigation services to assist homeless individuals and families, including those staying in emergency shelter, make the transition to permanent housing and prevent returns to homelessness. Finally, the City will work to increase the availability of affordable housing in Gastonia by using HOME funds for home rehabilitation and to support the development of new affordable rental housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Housing and service providers in Gastonia work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. These groups include extremely low-income individuals and families, people discharged from institutions, and those receiving assistance from agencies addressing a variety of needs, such as housing, health, social services, education or youth needs. The City anticipates continued funding for homelessness prevention over the next five years, including tenant-based rental assistance and/or utility assistance.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City of Gastonia follows HUD's Lead Safe Housing Rule requirements in all of its federally funded affordable housing development activities. The City also connects individuals with lead safety education and volunteer opportunities for housing rehabilitation and repair.

How are the actions listed above related to the extent of lead poisoning and hazards?

Following the Lead Safe Housing Rule requirements in federally funded housing activities reduces risk of lead poisoning and hazards. The Lead Safe Housing Rule is designed to reduce hazards relating to lead-based paint in housing, which include irreversible health effects, brain and nervous system damage, reduced intelligence, and learning disabilities. Children, pregnant women, and workers are most at risk of experiencing negative health effects resulting from exposure to lead-based paint hazards. More than 20 million homes built before 1978 contain lead-based paint hazards. For these reasons, it is vital that the City of Gastonia reduce lead-based paint hazards in all federally funded housing activities.

How are the actions listed above integrated into housing policies and procedures?

The City of Gastonia integrates Lead Safe Housing Rule requirements into housing policies and procedures by following HUD's Lead Safe Housing Rule requirements in all of the City's federally-funded affordable housing development activities.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The 2013-2017 5-Year American Community Survey estimates the city of Gastonia's poverty rate at 19%, above the statewide poverty rate of 16%. The city's poverty rate has decreased slightly since the 2008-2012 5-Year American Community Survey, when it was estimated at 21%.

Prosperity for Greater Charlotte: Comprehensive Economic Development Strategy (2017-2022), Gastonia 2025 Comprehensive Plan: Our Place in the Future (2011), and other local and regional plans detail goals for reducing poverty in the city of Gastonia and the county, including:

Economic and Workforce Development

- Improve K-12 education by promoting increased government funding.
- Focus on workforce preparedness.
- Develop regional system for promoting and tracking career pathway training and attainment.
- Promote educational opportunities for defined career paths in high-growth industries.
- Develop an outreach campaign targeting middle and high school students that promotes middle-skill career opportunities.
- Develop materials that promote the value of universal career pathway systems.
- Promote a diverse workforce by attracting talent and creating a more inclusive environment.
- Support and encourage the formation and expansion of multi-national cultural groups, networks, organizations and schools.
- Create materials that explain how cultural outreach and inclusion can benefit businesses in the region.
- Support communication campaigns, through webpages and CEDC quarterly newsletter, that promote career opportunities and the requisite training to K-12 students, university graduates and adult workers.
- Continuously promote workforce initiatives that align education options with in-demand occupations.
- Reach out to local businesses and use networks like chambers of commerce, trade groups and human resources to identify specific workforce shortages and incumbent workforce training needs.
- Develop communication materials to advocate for incumbent workforce resources with state and federal agencies.
- Strengthen employer educator communications and partnerships.
- Unite entities behind a shared vision to expand and improve entrepreneurship, including political leadership, aligned resources across the region, and an effort to facilitate startups.

Housing and Homelessness

- Ensure a variety of housing opportunities and choices for all income levels.
- Assess current and future housing availability and its alignment with future growth and employment patterns.
- Assess housing affordability near employment centers and existing infrastructure.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The affordable housing, workforce development, and homelessness programs detailed in this plan aim to support the achievement of the housing and economic development goals in Gastonia. To combat poverty and reduce the number of poverty-level families, the City has devoted resources to public service programs, including supporting individuals and families in poverty through homeownership and personal finance training, homeownership assistance, electric bill assistance, and housing rehabilitation. The Gaston County Workforce Development Board also provides support in all aspects of employment, including resume preparation, career development, and specific skills training. This plan continues to identify assisting persons living in poverty as a goal for the CDBG program. The City will continue to fund services to assist individuals in obtaining housing, employment, and other needs.

In addition to economic development programs, many homelessness programs and homeless service providers also address expanded employment opportunities as an avenue for combating poverty. Family Promise of Gaston County, for example, offers community initiatives including job training, childcare, and financial literacy. Programs aimed at educating youth, young adults, and adults also combat poverty by developing skills that will allow residents to secure better jobs at higher wages. This plan also calls for continued support for case management services that connect individuals with employment opportunities while also supporting them in meeting other needs, such as housing and supportive services.

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Gastonia Housing and Neighborhoods Division (HND) has a written Monitoring Policy for the purpose of providing guidelines to self-monitor as well as monitor partners, sub-recipients and CHDOs.

Through administrative funds of the program, the City of Gastonia provides staff trained in program requirements and compliance to monitor and review all proposed and the activities within those projects. The monitoring process for projects and specific activities is determined by size, duration, type, performance measure and how the project/activity is carried out i.e. internal activity, sub-recipient activity and CHDO activity.

Internal activities are carried out by HND professionally-trained staff. The activity is reviewed by supervisory staff and/or contractor before, during and after completion of the project/activity. The activity is monitored for compliance before being placed and/or completed in HUD's Integrated Disbursement and Information System (IDIS). Each activity is monitored for (1) National Objective and Outcome; (2) Eligibility & Matrix Code; (3) Financial Feasibility; (4) Compliance; and (5) Accomplishment Data.

Sub-recipient activities are defined through an approved contract with the Housing and Neighborhoods Division. Each sub-recipient is monitored annually, bi-annually or quarterly depending upon the sub-recipient's experience and compliance history. Monitoring is performed on-site, if possible, by reviewing activity files for requirements such as internal activities, which can encompass: objective and outcome, eligibility, financial feasibility and records, compliance and accomplishment data.

Expected Resources

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

Introduction

The City of Gastonia expects to receive a total allocation of \$1,462,735 in HUD grant funds for the 2020 program year, including \$656,830 in CDBG and \$805,905 in HOME grant funds.

Anticipated Resources

Program	Source	Uses of Funds	Expe	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements						Funding to assist low- and moderate- income neighborhoods and households with housing, services, employment opportunities, and public improvements.
		Public Services	656,830	2,315	0	659,145	2,364,588	

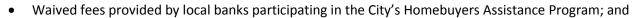
Program	Source	Uses of Funds	Expe	cted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public -	Acquisition						Funding to assist low- and moderate-
	federal	Homebuyer						income households obtain and maintain
		assistance						safe, decent, and affordable housing.
		Homeowner						
		rehab						
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	805,905	21,344	0	827,249	2,901,258	

Table 54 - 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 City of Gastonia will leverage resources through partnerships with local agencies, including nonprofit organizations and for-profit companies, that contribute additional funding and staff time to the projects funded through CDBG and HOME grant money. Over the next five years, Gastonia anticipates satisfying match requirements through a variety of means, such as:

- City of Gastonia funding and other support for Reinvestment in Communities of Gaston County (RIC);
- Local funding provided by the United Way of Gaston County;
- Local funding provided by Continuum of Care member agencies;
- In kind services for new construction and rehabilitation by Habitat for Humanity;



• Grant match funds for public facility and infrastructure projects.

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

CDBG funding may be used to develop public facilities or infrastructure on existing publicly-owned land to benefit low- and moderate-income people or households. Additionally, publicly-owned residential lots may be used to support affordable housing / homeownership opportunities for low- and moderate-income households. If CDBG or HOME grant funds are ever used to acquire property for public purpose, the City will follow acquisition requirements to determine fair market value.

Discussion

In addition to the \$656,830 in CDBG and \$805,905 in HOME grant funds, \$386,391 of CARES ACT Funding (CDBG-CV) was added to the 2019-20 Annual Action Plan as part of the 2015-19 Consolidated Plan.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
1	Safe and Decent	Year 2020	Year 2024	Affordable Housing	Area Central	Develop, Acquire, or	CDBG:	Rental units constructed: 10
-	Affordable	2020	2021	/ moradore modeling	Gastonia	Preserve Affordable	\$287,489	Household Housing Unit
	Housing				Gustoma	Housing	HOME:	Homeowner Housing
	110 431116					Homebuyer	\$752,395	Rehabilitated: 12 Household
						Assistance	φ102,000	Housing Unit
						Rental Assistance		Direct Financial Assistance to
								Homebuyers: 65 Households
								Assisted
								Tenant-based rental assistance /
								Rapid Rehousing: 60 Households
								Assisted
2	Homeless	2020	2024	Homeless	Central	Homeless Housing	CDBG:	Public service activities other
	Assistance and				Gastonia	and Supportive	\$98,000	than Low/Moderate Income
	Services					Services		Housing Benefit: 400 Persons
								Assisted
								Homelessness Prevention: 242
								Persons Assisted
3	Demolition and	2020	2024	Non-Housing	Central	Public Improvements/	CDBG:	Public Facility or Infrastructure
	Clearance			Community	Gastonia	Neighborhood	\$10,001	Activities other than
				Development		Revitalization		Low/Moderate Income Housing
								Benefit: 649 Persons Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
4	Public	2020	2024	Non-Housing	Central	Public Improvements/	CDBG:	Public Facility or Infrastructure
	Improvements			Community	Gastonia	Neighborhood	\$124,014	Activities other than
				Development		Revitalization		Low/Moderate Income Housing
								Benefit: 7500 Persons Assisted
5	Fair Housing	2020	2024	Fair Housing	Central	Fair Housing	CDBG:	Public service activities other
					Gastonia	Education and	\$9,225	than Low/Moderate Income
						Enforcement		Housing Benefit: 400 Persons
								Assisted
6	Program	2020	2024	Administration	Central	Program	CDBG:	Other: 1 Other
	Administration				Gastonia	Administration	\$130,416	
							HOME:	
							\$74,854	

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Safe and Decent Affordable Housing			
	Goal Description	 Support development or rehabilitation/preservation of rental housing affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County. 			
		 Support development of for-sale housing units affordable to low- and moderate-income households, including projects in high opportunity and/or low poverty areas of the City and County. 			
		 Preserve the existing affordable housing stock by assisting income-eligible homeowners with housing rehabilitation and repairs. 			
		 Provide homebuyer preparation and financial management classes to increase the number of low- and moderate- income households positioned to purchase homes. 			
		 Increase the number of first-time home buyers through down payment and closing cost assistance. 			
		Working with community partners, assist income-eligible renter households with tenant-based rental assistance.			
		• Collaborate with agencies in the CoC and others to assist households at-risk of homelessness with short-term rental payments, utility assistance, rapid rehousing, or other assistance.			
2	Goal Name	Homeless Assistance and Services			
	Goal Description	 Collaborate with agencies in the CoC and others to assist people who are homeless through provision of and access to emergency, transitional, and permanent housing to enable them to move to appropriate housing and achieve greater stability. 			
		 Collaborate with agencies in the CoC and others to provide access to coordinated support services and case management for people experiencing homelessness. 			
3	Goal Name	Demolition and Clearance			
	Goal Description	Clear, demolish, or remediate structures to prevent blight in low- and moderate-income areas.			

4	Goal Name	Public Improvements				
	Goal Description	 Fund infrastructure improvements and public facilities such as sidewalks, street lighting, pedestrian facilities, ADA improvements, recreation centers, and parks in income-eligible areas. 				
		 Assist community service organizations in improving their physical structures to meet goals for serving low- and moderate-income households, people who are homeless, and other special needs populations. 				
5	Goal Name	Fair Housing				
	Goal Description	 Conduct fair housing education efforts targeted to members of the public, including those most vulnerable to housing discrimination, and housing professionals, specifically including independent landlords. 				
		 Continue the City of Gastonia's fair housing hotline and raise awareness about the City of Gastonia Fair Housing Officer. 				
		Consider fair housing testing targeted toward identifying rental market discrimination.				
6	Goal Name	Program Administration				
	Goal Description	 Program administration costs related to planning and execution of community development, housing, and homelessness activities funded through the CDBG and HOME programs. 				

AP-35 Projects - 91.420, 91.220(d)

Introduction

The projects listed below represent the activities Gastonia plans to undertake during the 2020 program year to address the goals of providing decent affordable housing, promoting a suitable living environment, and encouraging economic opportunity.

#	Project Name
1	CDBG Administration
2	CDBG Continuum of Care Technical Assistance
3	CDBG Continuum of Care Subrecipient Grant
4	CDBG HMIS Support
5	CDBG Hope 4 Gaston
6	CDBG Housing Rehab
7	CDBG Project Delivery Costs
8	CDBG Demolition and Clearance
9	CDBG Property Acquisition
10	CDBG Property Disposition and Maintenance
11	CDBG Public Improvements
12	CDBG Fair Housing
13	HOME Administration
14	HOME CHDO Set-Aside
15	HOME CHDO Capacity Building
16	HOME New Construction
17	HOME Direct Homeownership Assistance
18	HOME Tenant-Based Rental Assistance

Table 56 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration			
	Target Area	Central Gastonia			
	Goals Supported	Program Administration			
	Needs Addressed	Program Administration			
	Funding	CDBG: \$130,416			
	Description	Funds allocated for salaries, fringe benefits, and other general expenses for planning and administration of the Housing and Neighborhoods Departments CDBG programs.			
	Target Date	6/30/2021			
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable			
	Location Description	Garland Municipal Business Center, Gastonia, NC			
	Planned Activities	CDBG program planning and administration.			
2	Project Name	CDBG Continuum of Care Technical Assistance			
	Target Area	Central Gastonia			
	Goals Supported	Homeless Assistance and Services			
	Needs Addressed	Homeless Housing and Supportive Services			
	Funding	CDBG: \$75,000			
	Description	Funds allocated to provide technical assistance to the Continuum of Care and build capacity for the homeless strategy.			
	Target Date	6/30/2021			
	Estimate the number and type of families that will benefit from the proposed activities	Homelessness prevention: 242 persons assisted			
	Location Description	Garland Municipal Business Center, Gastonia, NC			
	Planned Activities	Technical assistance and capacity building for the Gaston-Lincoln-Cleveland Continuum of Care.			
3	Project Name	CDBG Continuum of Care Subrecipient Grant			
	Target Area	Central Gastonia			
	Goals Supported	Homeless Assistance and Services			

	Needs Addressed	Homeless Housing and Supportive Services			
	Funding	CDBG: \$3,000			
	Description	Funds allocated to assist Continuum of Care and other service providers serving low- and moderate-income clients.			
	Target Date	6/30/2021			
	Estimate the number and type of families that will benefit from the proposed activities	Public service activity other than low/moderate income housing benefit: 400 people assisted			
	Location Description				
	Planned Activities	Various locations in Gastonia, to be determined during the program year.			
4	Project Name	CDBG HMIS Support			
	Target Area	Central Gastonia			
	Goals Supported	Homeless Assistance and Services			
	Needs Addressed	Homeless Housing and Supportive Services			
	Funding	CDBG: \$20,000			
	Description	Funds allocated to support the Continuum of Careâ¿¿s use of the Homeless Management Information System (HMIS).			
	Target Date				
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable			
	Location Description	Garland Municipal Business Center, Gastonia, NC			
	Planned Activities	Support the Continuum of Care's use of HMIS.			
5	Project Name	CDBG Hope 4 Gaston			
	Target Area	Central Gastonia			
	Goals Supported	Safe and Decent Affordable Housing			
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing			
	Funding	CDBG: \$2,000			
	Description	Funds allocated to provide minor home repair to homeowners living in low- and moderate-income areas.			

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Public service activity for low/moderate income housing benefit: 400 housing units
	Location Description	Various locations in Gastonia, to be determined during the program year.
	Planned Activities	Minor home repairs in low- and moderate-income areas.
6	Project Name	CDBG Housing Rehab
	Target Area	Central Gastonia
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	CDBG: \$210,000
	Description	Funds allocated to assist low- and moderate-income homeowners undertake housing rehabilitation, including to address health and safety issues, housing quality, energy conservation, accessibility for people with disabilities, and water/sewer taps.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner housing rehabilitated: 12 housing units
	Location Description	Various locations in Gastonia, to be determined during the program year.
	Planned Activities	Housing rehabilitation for low- and moderate-income homeowners.
7	Project Name	CDBG Project Delivery Costs
	Target Area	Central Gastonia
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	CDBG: \$45,489
	Description	Funds allocated for salaries, fringe benefits, and other general expenses in the execution of the Housing and Neighborhoods Departmentâ¿¿s affordable housing programs.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Garland Municipal Business Center, Gastonia, NC
	Planned Activities	Execution of Gastonia's affordable housing programs.
8	Project Name	CDBG Demolition and Clearance
	Target Area	Central Gastonia
	Goals Supported	Demolition and Clearance
	Needs Addressed	Public Improvements/ Neighborhood Revitalization
	Funding	CDBG: \$10,001
	Description	Funds allocated to clear, demolish, or remediate structures to prevent blight in low- and moderate-income areas.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Public facility or infrastructure activity other than low/mod income housing benefit: 649 persons assisted
	Location Description	Various locations in Gastonia, to be determined during the program year.
	Planned Activities	Demolition, clearance, or remediation of structures.
9	Project Name	CDBG Property Acquisition
	Target Area	Central Gastonia
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	CDBG: \$10,000
	Description	Funds allocated to acquire affordable housing units for homeownership.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other: 65 housing units acquired

	Location Description	Various locations in Gastonia, to be determined during the program year.
	Planned Activities	Acquisition of affordable housing units for homeownership.
10	Project Name	CDBG Property Disposition and Maintenance
	Target Area	Central Gastonia
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	CDBG: \$20,000
	Description	Funds allocated for disposition and maintenance of properties owned or acquired by the Housing and Neighborhoods Department.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Property care: 6 housing units
	Location Description	Various locations in Gastonia, to be determined during the program year.
	Planned Activities	Property maintenance and disposition.
11	Project Name	CDBG Public Improvements
	Target Area	Central Gastonia
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements/ Neighborhood Revitalization
	Funding	CDBG: \$124,014
	Description	Funds allocated for the provision or improvement of various public infrastructure/public facilities to provide the greatest community benefit in low- and moderate-income areas.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Public facility or infrastructure activities other than low/moderate income housing benefit: 7,500 persons assisted
	Location Description	Various locations in Gastonia, to be determined during the program year.
	Planned Activities	Provision or improvement of public infrastructure and/or facilities.

12	Project Name	CDBG Fair Housing
	Target Area	Central Gastonia
	Goals Supported	Fair Housing
	Needs Addressed	Fair Housing Education and Enforcement
	Funding	CDBG: \$9,225
	Description	Funds allocated for general expenses for fair housing administration, fair housing activities, fair housing hotline, and recruitment of minority contractors.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than low/moderate income housing benefit: 400 persons assisted
	Location Description	Garland Municipal Business Center, Gastonia, NC
	Planned Activities	Fair housing activities and administration.
13	Project Name	HOME Administration
	Target Area	Gastonia Consortium
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOME: \$74,854
	Description	Funds allocated for salaries, fringe benefits, and other general expenses for planning and administration of the Housing and Neighborhoods Departmentÿ¢ÿ¿¿A¿B HOME programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	Garland Municipal Business Center, Gastonia, NC
	Planned Activities	HOME program planning and administration.
14	Project Name	HOME CHDO Set-Aside
	Target Area	Gastonia Consortium
	Goals Supported	Safe and Decent Affordable Housing

	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	HOME: \$120,929
	Description	Funds allocated to develop affordable housing for low- and moderate-income households, with an emphasis on the special needs population.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 6 units
	Location Description	Location in the Gastonia Consortium to be determined during the program year
	Planned Activities	Affordable housing development.
15	Project Name	HOME CHDO Capacity Building
	Target Area	Gastonia Consortium
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	HOME: \$29,122
	Description	Funds allocated for capacity building / operating support for CHDO involved in development of affordable housing.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	Location in the Gastonia Consortium to be determined during the program year.
	Planned Activities	Capacity building / operating support for affordable housing development.
16	Project Name	HOME New Construction
	Target Area	Gastonia Consortium
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Develop, Acquire, or Preserve Affordable Housing
	Funding	HOME: \$141,000

	Description	Funds allocated for the development of new, affordable single-family rental homes.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 4 units
	Location Description	Location in the Gastonia Consortium to be determined during the program year.
	Planned Activities	Affordable housing development.
17	Project Name	HOME Direct Homeownership Assistance
	Target Area	Gastonia Consortium
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Homebuyer Assistance
	Funding	HOME: \$411,344
	Description	Funds allocated for provision of down payment and closing cost assistance to qualified low- and moderate-income homebuyers.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Direct financial assistance to homebuyer: 65 households assisted
	Location Description	Various locations in the Gastonia Consortium, to be determined during the program year.
	Planned Activities	Down payment and closing cost assistance to qualified low- and moderate-income homebuyers.
18	Project Name	HOME Tenant-Based Rental Assistance
	Target Area	Gastonia Consortium
	Goals Supported	Safe and Decent Affordable Housing
	Needs Addressed	Rental Assistance
	Funding	HOME: \$50,000
	Description	Funds allocated for help individuals acquire permanent rental housing. Assistance is up to a maximum of 24 months.
	Target Date	

Estimate the number and type of families that will benefit from the proposed activities	Tenant-based rental assistance: 60 households assisted
Location Description	Various locations in the Gastonia Consortium, to be determined during the program year.
Planned Activities	Assistance acquiring permanent rental housing.

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

CDBG funding is allocated to the City of Gastonia for use within the city limits for housing assistance, public services, economic development, and public infrastructure and facility improvements. The Local Target Area shown below includes Gastonia city limits, where 100% of CDBG funds will be spent over the next five years.

As of the FY2019, HUD identified 60 of the City's 85 block groups as having low- and moderate-income population shares over 51%, meaning that they are eligible for CDBG projects that provide an areawide benefit. These block groups covered most of the city west of Armstrong Park Road/Cox Road and north of East Hudson Boulevard to Union Road (see Figure 18).

HOME funding is allocated to the Gastonia Consortium and administered by the City of Gastonia for use throughout Gaston County, excluding Spencer Mountain and High Shoals and including all of Kings Mountain.

Geographic Distribution

Target Area	Percentage of Funds
Central Gastonia	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Gastonia determined its 2020 projects based on priority needs, eligibility, availability of funds, and readiness to proceed, with emphasis on improving neighborhood conditions and access to opportunity in high poverty areas and increasing the number of affordable housing units throughout the Consortium.

Discussion

Affordable Housing

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

Introduction

Over the 2020 program year, Gastonia will assist 147 with affordable housing. Through CDBG, the City will fund housing rehabilitation for 12 homeowners. Through HOME, the Consortium will fund tenant-based rental assistance for 60 households, down payment and closing cost assistance for 65 homebuyers, and new construction of 10 affordable rental units, including 6 by a CHDO with a focus on housing for special needs groups. Additionally, the Continuum of Care will use CDBG funds to provide homeless prevention services for 242 people at risk of homelessness.

One Year Goals for the Number of Households to be Supported	
Homeless	242
Non-Homeless	141
Special-Needs	6
Total	389

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	60
The Production of New Units	10
Rehab of Existing Units	12
Acquisition of Existing Units	65
Total	147

Table 59 - One Year Goals for Affordable Housing by Support Type **Discussion**

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

Introduction

Gaston County residents are served by three housing authorities – the Gastonia Housing Authority (GHA), the Belmont Housing Authority, and the Mount Holly Housing Authority. GHA is the largest and manages the Section 8 / Housing Choice Voucher (HCV) program for the entire county, which includes about 1,650 vouchers, according to GHA's 2019 Public Housing Authority Annual Plan. Previously, GHA owned and operated about 400 units of public housing at three properties (Weldon Heights, Mountain View, and Linwood Terrace), however, in recent years, GHA has converted all its public housing properties under HUD's Rental Assistance Demonstration (RAD) program. Under this program, housing authorities move public housing units to project-based Section 8 voucher assistance, allowing a nonprofit or for-profit entity to own and manage the property and obtain additional financing for maintenance and rehabilitation. While Weldon Heights, Mountain View, and Linwood Terrace are no longer public housing, they still provide affordable housing for low-income households, including newly-renovated three-, four-, and five-bedroom units.

The Belmont Housing Authority owns and operates one public housing property – Flowers Court – which includes 50 two-, three-, and four-bedroom apartments. Belmont Housing Authority also manages Myrtle Terrace, a 32-unit, one-bedroom affordable rental community with project-based Section 8 assistance.

Mount Holly Housing Authority owns the 46-unit Holly Hills Apartments, which is managed by the Statesville Housing Authority.

Other privately-owned project-based Section 8 and Low Income Housing Tax Credit (LITHC) communities provide additional affordable housing in Gaston County.

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

GHA converted its public housing units – about 400 units in the Weldon Heights, Mountain View, and Linwood Terrace communities – to project-based Section 8 vouchers under the RAD program in order to leverage additional funds for property improvements. As identified under GHA's most recent PHA 5-Year Plan, goals for restoring and revitalizing these properties included:

- Using capital funds and other available funding to modernize units;
- Performing an energy audit;

Replacing water and sewer infrastructure and Weldon Heights and Mountain View; and

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

Over the 2020 program year, GHA and the City's Housing and Neighborhoods Division will continue collaborating to connect residents and voucher holders with homeownership opportunities through the Family Self-Sufficiency Program (operated by GHA) and the Home Buyer's Club and Homebuyer's Assistance Program (operated by the City). Through these programs, households can save funds in an escrow account to be applied toward homeownership and receive financial counseling, down payment assistance, and other help making a home purchase. According to GHA's 2019 Annual PHA Plan, 27 families were participating in the Section 8 Family-Self Sufficiency Program, with 18 saving down payment or other funds in an escrow account and 6 graduating.

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

No housing authorities in Gaston County are designated as troubled. GHA is considered a High Performer.

Discussion

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

The City of Gastonia is covered by the Gaston Lincoln Cleveland Continuum of Care, a network of service providers covering Gaston, Lincoln, and Cleveland counties. The Gaston Lincoln Cleveland Continuum of Care brings together housing and service providers to meet the needs of individuals and families experiencing homelessness. The City of Gastonia will continue to partner with the Continuum of Care and local homelessness service providers to achieve the City's homelessness goals.

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

Over the next year, members of the Gaston Lincoln Cleveland Continuum of Care and other homeless housing and service providers in the city of Gastonia will continue reaching out to homeless persons, including unsheltered persons, through street outreach and emergency shelter services. For the 2020 program year, the City will provide funding to the CoC for a variety of activities, including needs assessment and use of HMIS, through the CDBG program.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2020 program year, the Salvation Army will continue providing emergency shelter services in the city of Gastonia. Working with local partner organizations, the City will assist homeless individuals and families or those at risk of homelessness with access to housing through the provision of tenant-based rental assistance

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

During the 2020 program year, the City of Gastonia will work to increase the availability of affordable housing by using HOME funds to support housing development, provide homeownership assistance, and provide housing rehabilitation for low-income homeowners.

The City will also continue to support the Continuum of Care, members of which provide supportive services and housing search assistance for individuals and families consistent with a Housing First

approach. Through the CoC, the City will fund organizations that provide case management and housing navigation services to assist individuals and families experiencing homelessness transition to permanent housing and prevent returns to homelessness.

Finally, the City will take steps to implement the strategies in its Analysis of Impediments to Fair Housing Choice, which includes strategies to support housing affordability in the city.

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.

Over the next year, housing and service providers in the City of Gastonia will continue to work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. The City will continue funding tenant-based rental assistance through its partners, including Hope 4 Gaston and Reinvestment in Communities (RIC).

Discussion

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

Introduction

The City of Gastonia completed an Analysis of Impediments to Fair Housing Choice (AI) covering the city and county in 2019. Part of that analysis included an examination of the city's zoning code and other public policies that impact housing affordability and fair access to housing. Fair housing barriers included:

- 1. Affordable housing needs that disproportionately impact protected classes;
- 2. Uneven access to opportunity;
- 3. Racial disparities in access to homeownership;
- 4. Limited housing options for people with disabilities; and
- 5. Need for continued and expanded fair housing activities.

The AI found that about 42% of households in the city and 34% in the county have one or more housing needs (cost burden, overcrowding, or lack of complete kitchen or bath facilities). In both Gastonia and Gaston County, households of color are 1.7 times more likely than white households to have a housing need. The zoning ordinance review identified factors that may impact housing cost / affordability in the city. Under the city's current Unified Development Ordinance (UDO), low density multifamily development is permitted by right in most mixed-use zones, but medium and higher density requires additional administrative and public hearing processes for approval through conditional use zoning or variances, which can impose higher costs on development and may artificially and unreasonably affect the feasibility of developing affordable and low-cost housing within the city. The AI noted that multifamily density and height standards could be increased by right instead of requiring conditional use or variance for approval.

The AI described additional ways the City of Gastonia could amend its UDO to reduce housing costs, noting that, "as land costs increase the City could consider lowering the minimum lot size requirements and removing the conditional permit approval process for two-family and multi-family housing developments in some districts and instead rely on a less time-consuming and less expensive administrative site plan review process to maintain oversight." It also identified an opportunity to expand the affordable housing supply by permitting accessory dwelling units for rent, especially in low-density, large-lot areas where they could be easily accommodated. The City's land use regulations could also go further to incentivize the development of affordable housing through inclusionary zoning policies.

The AI also specifically considered access to housing, including affordable housing, for people with disabilities. It noted that Gastonia's UDO restricts transitional housing facilities (defined as ones that provide support services, such as counseling, on an ongoing basis to up to twelve residents to assist with needs such as homelessness, employment, health and behavioral matters, and life skills) to commercial and industrial zones (C-2, C-3, and IU zones), thereby excluding them from residential zones. The AI

found that this restriction could limit housing options and have a disproportionate impact on people with disabilities, people of color, families with children, or other protected groups.

In addition to the affordable housing barriers discussed in the Analysis of Impediments, public input for this Consolidated Plan also identified public policies that inhibit affordable housing and residential development. Stakeholders note that current City regulations prohibit new shelters within Gastonia city limits, but this is where transportation and other services that homeless residents rely on are most available. Stakeholders also noted the potential for increased rental housing costs and higher property taxes around the FUSE development, which could decrease affordability for both renters and owners.

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

Gastonia's 2019 Analysis of Impediments to Fair Housing Choice identified strategies and related implementation steps the City plans to take over the next five years to remove or ameliorate public policy barriers to affordable housing.

To address the limited supply of affordable housing and its disproportionate impact on households of color, the City will:

- Continue using HOME and CDBG funds to increase and maintain the availability of affordable rental and for-sale housing in the city and county through new construction and rehabilitation, including by working with local Community Housing Development Organizations (CHDOs).
 Consider ways CDBG funding may be used for infrastructure improvements that would enable the development of new affordable rental or for-sale units.
- Review North Carolina's allocation process for Low Income Housing Tax Credits (LIHTCs) to
 identify ways the City may be able to better impact the competitiveness of developers'
 applications, including local nonprofit developers. For developers proposing LITHC projects in
 areas with access to key community resources/opportunity factors or areas experiencing a loss
 of affordable rental units, work with them to increase the competitiveness of their applications
 through letters of support, provision of information, or other assistance.
- Monitor rent levels, home prices, and property taxes in Gastonia neighborhoods at risk for gentrification. As redevelopment occurs, consider ways to encourage the development of mixed-income housing or incentivize the inclusion of affordable housing units.

To address limits on as-of-right higher density multifamily development, the City will:

• Review the City's zoning ordinance and table of permitted uses to consider where allowances for denser as-of-right multifamily development may be made.

To improve housing access and affordability for people with disabilities, the City will:

- Review the City's zoning ordinance and table of permitted uses to consider where allowances for transitional housing facilities may be made within residential zoning districts.
- Draft and adopt local code amendments that would expand transitional housing facility siting
 options and provide an administrative alternative to a variance application for people
 requesting accommodation or modification related to a disability.

In addition to addressing barriers identified in the Analysis of Impediments to Fair Housing Choice, the City will continue funding affordable housing and homeownership opportunities through its CDBG and HOME funds, as well as exploring new models to improve housing access and supportive services for people who are experiencing homelessness.

Discussion

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

Introduction

This section details the City of Gastonia's actions planned to ensure safe and affordable housing for its residents, along with plans to meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

Actions planned to address obstacles to meeting underserved needs

Lack of sufficient funding and high costs for new development are two of the biggest obstacles to meeting underserved needs in the City of Gastonia and the Gastonia Consortium. In order to develop additional resources to meet affordable housing and homeless housing and service needs in the city and county, the City of Gastonia will continue working to identify and develop partnerships with private agencies with the goal of increasing the supply of affordable housing. These may include LIHTC or other developers considering housing projects in the city or county.

The City will also see possible available funding or grants that can be leveraged to bring new dollars for affordable housing or homelessness into the community.

Additionally, the City will review its zoning code for possible changes that would decrease costs or risk for multifamily developments, including identifying zones where denser multifamily construction may be built as-of-right.

Actions planned to foster and maintain affordable housing

In an effort to maintain the current affordable housing stock, the City of Gastonia will continue to provide funding for down payment assistance through its Homebuyer's Assistance Program and home rehabilitation assistance through its Homeowner Rehabilitation Program. The City will also continue to provide homeownership training to prospective homebuyers through its Home Buyers Club.

In addition to specific programs designed to foster and maintain affordable housing, the City will review its zoning ordinances for prospective barriers to affordable housing development and make amendments as needed. The City has recently updated its Analysis of Impediments to Fair Housing Choice. As a result of this study, the City may undertake additional approaches to fostering fair and affordable housing.

Actions planned to reduce lead-based paint hazards

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have focused on reaching this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community

Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

In property rehabilitation projects involving the City of Gastonia, the City will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992. The City of Gastonia is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs it implements.

Actions planned to reduce the number of poverty-level families

The City of Gastonia's anti-poverty strategy focuses on helping all low-income households improve their economic status and remain above the poverty level. This may include, but is not limited to housing and employment navigation, substance abuse recovery, healthcare, food and clothing, and transportation. Current programs to reduce poverty through access to education and jobs are provided by the Gaston County Workforce Development Board, as well as through the City's nonprofit grantees. Emergency assistance is also provided by several nonprofit housing and service agencies in the city. Additionally, the City of Gastonia's housing programs and activities that support development of affordable housing inherently address poverty by creating housing opportunities for low-income households. Without these housing opportunities, many low-income households would not be able to afford housing rehabilitation costs or to purchase a home.

Actions planned to develop institutional structure

The unmet needs of housing affordable to low- and moderate-income residents and social services for individuals and families experiencing or at risk of homelessness present an opportunity for the city to connect with organizations, affordable housing developers, and agencies working in these areas in Gastonia and the surrounding region. The City will also continue to work within existing partnerships and coalitions, such as the Gaston Lincoln Cleveland Continuum of Care, to work toward meeting local housing and service needs. The City of Gastonia will continue to work closely with state and local agencies and governments, nonprofit organizations, and other service providers to coordinate delivery of services to Gastonia residents. The Housing and Neighborhoods Department will continue to consult with various housing, homelessness, social service, elderly and disability resource agencies to gather data and identify service gaps.

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

The City of Gastonia will continue to be an active participant in the Gaston Lincoln Cleveland Continuum of Care. The Continuum of Care brings together nonprofit, government, and business leaders to provide

a shared approach to goals of ending homelessness. Membership includes emergency, transitional, and permanent housing providers; nonprofit social service organizations; and government agencies.

The City will also continue collaboration with the Gastonia Housing Authority to connect participants in GHA's Family Self-Sufficiency Program with first time homebuyer assistance provided by the City. As noted by HA staff, enabling residents and voucher holders to purchase homes allows their previously-occupied units or previously-held vouchers to be available to other low-income households waiting for housing.

Discussion

Program Specific Requirements

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

Introduction

Projects planned with 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.

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	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit	
persons of low and moderate income. Overall Benefit - A consecutive period of one,	
two or three years may be used to determine that a minimum overall benefit of 70%	
of CDBG funds is used to benefit persons of low and moderate income. Specify the	
years covered that include this Annual Action Plan.	90.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

The City of Gastonia is progressing with three affordable rental housing developments that have received funding from a combination of federal, state, and local sources including Low Income Housing Tax Credits, the North Carolina Housing Finance Agency's Workforce Housing Loan Program (WHLP) and Rental Production Program (RPP), the City of Gastonia (federal grant funding), private lending, and private developer funds.

Other sources of investment in housing activities in Gastonia include funds from the City of Gastonia, United Way, Continuum of Care member agencies, Habitat for Humanity, and HealthNet Gaston.

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:

See Appendix A: City of Gastonia Resale and Recapture Provisions.

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:

See Appendix A: City of Gastonia Resale and Recapture Provisions.

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:

The City has no plans to use HOME funds to refinance existing debut secured by multifamily housing that is rehabilitated with HOME funds.

Attachments

Combined Public Notice: Public Comment Period and Public Hearing for the 2020-2024 Consolidated Plan and FY2020-21 Annual Action Plan Budget

The City of Gastonia will submit its 2020-2024 Consolidated Plan, and FY2020-21 Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD) on or before August 15, 2020, or at such a date thereafter prescribed by HUD. This combined notice is to inform the public about the proposed actions and activities over each plan period. The purpose of these public hearings will be to obtain views from the public concerning the

- Five (5) year Consolidated Plan intended to assist communities in developing a collaborative procross whereby the community establishes a unified vision for community development actions for 2020 - 2024
- 2. Annual Action Plan to report what activities the City plans to undertake during the 2020-21 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 Gastionia, unincorporated areas of the County and the expanded HOME Consortium. Areas for participations in the Down Payment Assistance Program in: Belmont, Resserner City, Cherryville, Ranto, Löwell, Stanley, Cramerton, McAdonville, Dallas, Gaston County and Kings Mountain.

BUDGET

The proposed FY2020-21 Annual Action Plan Budget consists of \$659,130 total Community Devel opment Block Grant (CDBG) funds for the 2020 Program Year, \$656,830 is the FY2020-21 allocation, 23,500 is projected HOMF Program Incomo. In the eyent HUD changes the budget allocation for the Gastonia jurisdiction for either the CDBG or HOME Programs, the category amounts will be representative of and consistent with the current percentages for the above referenced allocation amounts.

PUBLIC COMMENT PERIOD

30-Day Public Comment Period

June 28, 2020 - July 28, 2020

The 2020-2024 Consolidated Plan and FY2020-21 Annual Action Plan will be available for public review and comment for a 30-day period. All comments must be received in writing. The following methods are being officing in lieu of the traditional procedures for plan review and comment submissions, and are as follows:

- Website: Review of the plans at https://www.cityofgastonia.com.
- Telephone Request: Request a copy of the plans or questions to (704) 866-6752.
- 3. Email: Request a copy of the plans, ask questions or submit comments to denetter@cityofgastonia.
- 4. Mail: Request plan copies or submit comments to: City of Gastonia, Community Services Department, PO Box 1748, Gastonia, NC 28053-1748

Due to State of North: Carolina Executive Orders declaring a State of Emergency to Prevent the Spread of COVID-19, the public will not be able to attend in-person meeting, and no public meeting will occur until Executive Orders expire. The public hearing for this proposed action will be conducted via conference call on:

Monday, June 29, 2020 - 4:30-5:30 pm, Teleconference Public Hearing Monday, July 13, 2020 - 6:00 pm - Citizen's Advisory Board Teleconforcace Meeting/Public Hearing For both public hearings, citizens may call (980) 224-1999, and enter conference ID 420-4899#. All Neighborhood/Community Organizations, Non-profit Organizations, Public and Private Housing Providers, and Citizens of Gastonia and Gaston County are invited to participate and voice concerns on the needs of the area.

The Gastonia City Council will review the plan for final approval at its regularly scheduled City Council Meeting on *Tuesday, August 4, 2020, 6:00pm.* The meeting will be held at Gastonia City Hall- Council Chambers, 181 S. South Street, Gastonia, NC 28052.

For additional information or to submit comments, contact Dahette Dyo, HUD Administrator, (704) 868-6758 or by email at denethed active front on a "INDIVIDUALS REQUIRING SPECIAL ACCO-MODATIONS FOR THIS PUBLIC HEARING SHOULD CALL THE ADA COORDINATOR AT (704) 866-6561 OR (704) 866-6863 FOR TOD USERS WITHIN 48 HOURS OF THE PUBLIC HEARING."

1-C June 20, 2020 Vincent C. Wong, Director of Community Services City of Gastonia Community Services Department PO Box 1748 | Gestonia, NC 28053-1748 (704) 866 6756

GN-114778

6/20/2020

AFFIDAVIT OF INSERTION OF ADVERTISEMENT The Gaston Gazette

Gastonia, N.C. Gaston County

The Gaston Gazette does certify that the advertisement for:

COMBINED PUBLIC NOTICE: COMMENT PERIOD AND

PUBLIC HEARING FOR THE 2020-2024 CONSOLIDATED PLAN AND FY20:20-21 ANNUAL ACTION PLAN BUDGET

Measuring <u>40.00 column inches</u> appeared in The Gaston Gazette, a newspaper published in Gaston County, Gastonia, N.C., in issue(s):

June 20, 2020

Name of Account: City of Gastonia - Community Services

Customer Number: 16316 Insert Order Number: 114778

Sworn to and subscribed before me this 22nd day of June, 2020.

rim Name (Classified Representative

Stephanie B. Sisk, Notary Public Stephanie B. Sisk, Notary Public Stephanie Stephanie March 23, 2025



PUBLIC COMMENTS

for the

2020-24 Consolidated Plan/2020-21 Annual Action Plan (Comment Period: June 28, 2020 - July 28, 2020)

Platform Received: Social Media/Facebook (posted 06/24/2020)

https://www.facebook.com/CityofGastonia/photos/a.21204146259097

6/957893318005783/?type=3&theater

Citizen Comment: Fixing some of the roads at intersections should be one of them (new

hope and franklin for sure), cleaning the trash off the streets.

Flattening or repurposing abandoned buildings

Thank you for your comment. The concerns that you mention cannot Response:

be addressed with this funding source, However, your comment has been forwarded to the appropriate City departments.

Action Taken as a result of

comment:

No planning action(s) taken as a result of the comment(s) received.

Platform Received: Social Media/Facebook (posted 06/24/2020)

https://www.facebook.com/CityofGastonia/photos/a.21204146259

0976/957893318005783/?type=3&theater

Citizen Comment: Paving FRALEY CHURCH ROAD as was planned last year, but still

not done.

Thank you for your comment. This grant money is not used for Response:

street resurfacing. The City is in the midst of a three-year project to resurface streets. The list of streets and repaying schedule was approved by the City Council last year. For more information, please contact the City's Engineering Division at 704-866-6943.

Action Taken as a result of

No planning action(s) taken as a result of the comment(s)

Platform Received: Social Media/Facebook (posted 06/24/2020)

https://www.facebook.com/CityofGastonia/photos/a,21204146259 0976/957893318005783/?type=3&theater

Citizen Comment:

Child protective services

Response:

Thank you for your comment, Child Protective Services is a county and state responsibility. It does not fall under the scope of the City of Gastonia's Community Services program or this draft plan.

Thank you for understanding.

Action Taken as a result of

comment:

No planning action(s) taken as a result of the comment(s)

received.

Social Media/Facebook (posted 06/24/2020) https://www.facebook.com/CityofGastonia/photos/e.2120414625 0976/957893318005783/?tvoe=38theater Lower Property Taxes No planning action(s) taken as a result of the comment(s received. Social Media/Facebook (posted 07/13/2020) https://www.facebook.com/CityofGastonia/posts/964435187351596 Social Scot its simple. 1st rule most be is to provide a safe and healthy environment to insure the quality of life for prosperity "HOA" if necessary. 2nd reassess the property value of the whole community , you may have to completely demolish whole towns small cities etc. The goal is for real home ownership with better schools etc.3rd Build an industrial park to provide a great living wage to help sustain the quality of life for the new community or cities. I have more but, in the Lehigh Valley i can show the boom
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and how it happen I its proof some the stuff I laid would worki'n looking at it happen here.
overig as a napper nece.
No planning action(s) taken as a result of the comment(s received.
Project website (www.gastoniaconplan.com)
I don't think the Black community in Gastonia solely needs education in order to be able to get a mortgage and buy a home. They lack the credit history, income, and savings to get a mortgage. These are systemic issues due to the extraction of wealth from Black communities. Improving economic opportunities will increase home ownership. One example would be to Ban the Box: encourage employers to not consider criminal records when hiring. I think the banks and credit unions should be pressured to improve the racial disparity in mortgage approvals. Finally, the City of Gastonia owns many small lots in the Highland area. I thin the CDBG program is good. It is also important to recognize that it is a historically Black community, so Black families should have priority for buying those homes.

Action Taken as a result of	APPENDIX: PUBLIC COMMENT No planning action(s) taken as a result of the comment(s)	
comment:	received.	
Platform Received:	Project website (www.gastonlaconplan.com)	
Citizen Comment:	I had came across the page on Facebook. Would like to add suggestions. I've moved to Gastonia 2018, still fairly new but loving it. I would like to suggestionare community centers for our youth with programs to get them involved in and a transportation system to get them there. Somewhere to play basketball, swimming, apply for jobs or learning about trades. It's hard for them to find these to do which leads them to de dumb things. Also more affordable living and resources for people who hit bottom.	
Response	and read less than people with the bottom.	
Action Taken as a result of comment:	No planning action(s) taken as a result of the comment(s received.	
Platform Received:	Feleconference Public Hearing (June 29, 2020)	
Citizen Commont:	Cen the CDBG funding be used to address mortgage lending disparities by race?	
Response;	The City's Analysis of Empediments to Fair Housing Choice discusses disparities in mortgage lending by race, and this is something the City can use funding to address.	
Action Taken as a result of comment:	No planning action(s) taken as a result of the comment(s received.	
Platform Recoived:	Citizons Advisory Board Zoom Meeting/ Teleconference Public Hearing (July 13, 2020)	
Citizen Comment;	With COVID and the situation now, especially with rental assistance, can someone speak to some thoughts on how that can be accessed at this time?	
Response:	The City is also getting a second grant. There will be additional CDBG money later this year specifically to respond to COVID that Isn't included in this plan. Re'nvestment in Communities currently administer Tenant-Based Rental Assistance, so the City refers everyone to them. The City is processing paperwork to release that funding. RIC has chosen to not administer the TBRA funding. The City will have to do another RFQ for another organization to take over the management of that program.	
Action Taken by a result of comment:	No planning action(s) taken as a result of the comment(s) received.	
Platform Received;	Citizens Advisory Board Zoom Meeting/ Teleconference Public Hearing (July 13, 2020)	

APPENDIX: PUBLIC COMMENTS Citizen Comment: Would that organization be responsible for distribution and accountability? Yes, the money flows from the City to that program. There is an agreement with the City that they have to follow the program guidelines and the City can review. They ask for reimbursement Response: from the City, and the City esks for reimbursement from the federal government Action Takon as a result, of No planning action(s) taken as a result of the communt(s) comment: received. Citizens Advisory Board Zoom Meeting/ Teleconference Public Hearing (July 13, 2020) Platform Received: Citizen Comment: So there is no way to apply for them? You have to be reimbursed? Response: All funds from the federal government are on a reimbursement. No planning action(s) taken as a result of the comment(s) Action Taken as a result of comment: received.

Grantee Unique Appendices

Appendix A: City of Gastonia Resale and Recapture Provisions

CITY OF GASTONIA RESALE AND RECAPTURE PROVISIONS

The City of Gastonia utilizes HOME Investment Partnership Program funds for homebuyer down payment assistance and homebuyer acquisition activities. These activities dictated the use of either the result or recapture provisions as outlined below.

I. DEFINITION OF TERMS

The following definition of terms are related to both the resale and recapture provisions:

- A. Income-eligible person or family shall mean a person or family having an income at or less than 80% of Area Median Income (AMI) according to the Charlotte-Gastonia- Rock Hill Metropolitan Area HUD Income Limits for family size.
- B. Original Homebuyer means the person or family to whom Subrecipient/Developer conveys the property after construction. The term shall not include any subsequent purchaser.
- C. Original Investment means funds provided by the Original Homebuyer for the purchase of the Property.
- D. Net Proceeds means the sales price minus superior loan repayment (other than HOME funds) and any closing costs. (Note: The City will limit the amount subject to recapture to the net proceeds available from the sale.)
- E. Direct HOME subsidy means the amount of HOME assistance including any program income that enabled the homeboyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homeowner (beneficiary). (Note: Only direct subsidy to the homebuyer is subject to recapture.)
- F. 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).
- G. Fair Return on Investment means the homebuyer's original investment in the property and the increase in the market value attributable to homebuyer investments in or capital improvements to the property.

1

II. RECAPTURE PROVISIONS

A. Program Summary

The City of Gastonia has adopted the *recopture* provision for its HOME-assisted Down Payment Assistance Program. The City of Gastonia is the grantee and direct recipient of entitlement funds, and administers the homebuyer down payment and closing cost assistance program. The program is available to residents of eligible member township agencies. Each consortia-participating member ogrees to abide by all applicable provisions of *recapture*. All provisions of recapture will be incorporated in a legally adopted written agreement.

B. Down Payment Assistance

The Down payment Assistance Program is a *direct subsidy* to the beneficiary to assist with down payment and closing cost, and is subject to recapture if any clause of default is triggered. Only direct subsidy to the homebuyer is subject to recapture. Default occurs when the beneficiary falls to use the property as the primary residence for the duration of the affordability period.

C. Forgivable Loan

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 written agreement.

D. <u>Default Trigger(s)</u>

If the homebuyer does not continue to occupy the property as the principal residence for the duration of the period of affordability, a pro-rated amount of the unsatisfied affordability period of the HOME homeowner assistance funds shall be due and payable. 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. Subjecting or renting is not permitted."

E. Recapture and Net Proceeds

Net sales proceeds on a pro-rated basis occurs when the original homeouyer sells the property during the affordability period. Net proceeds are the funds remaining from the sale of the property by the original homeouyer 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.

1. Foreclosure Recapture

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.

2

F. Recapture Revocation

The recapture provision shall be revoked, 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. The amount due to the City may also be forgiven to the extent allowed in the HOME regulations.

G. Affordability Period

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

1. Refinance

During the period of affordability, the homebuyer shall only be permitted to refinance the property when the new interest rate is a savings of at least 1 % (one and a half percent) interest rate savings over the life of the loan to the home owner and there is no cash out at closing.

H. Refinancing of Debt: Multi-Family Housing

The PJ will not use HOME funds to refinance multi-family housing or single family housing for rehabilitation.

I. American Dream Down Payment Initiative (ADDI)

The PJ will not receive ADDI funds.

III. RESALE PROVISIONS

A. Program Summary

The City of Gastonia has adopted the *resule* provision for its HOME-assisted humeuwhership housing when a development subsidy is provided to a subreciplent/developer and there is <u>no</u> direct subsidy to the homebuyer. All development subsidy funds shall be provided as a grant to the subreciplent/developer over the affordability period as evidenced by a note secured by a deed of trust on the property and in a legally adopted written agreement.

B. Resale Agreement

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 Orban 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.

When drafting agreements, the City incorporates the resale provisions when providing HOME funds in the form of a development subsidy to a subrecipient/developer of homebuyer affordable single family projects.

Covenants, Restrictions and Requirements

Concerning the resale provision, and agreement between the applicable parties will adhere to the following terms:

- i. The subrecipient agrees that if the property is sold during the period of affordability, the property shall be sold to and occupied by a low-income individual and/or family, and the property will serve as individual and/or family's the principal residence. The determination of whether a purchaser is income-eligible shall be determined as of the date the property is sold or transferred to such next (subsequent) purchaser.
- ii. If the Original Purchaser sells the Property during the Period of Affordability, the Original Purchaser shall be eligible to receive a fair return on investment. Fair Market Return 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

4

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 the next (subsequent) purchaser.

- 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 HOML investment in a lump sum immediately.
- iv. If the Original Purchaser does not continue to occupy the property as the principal residence, the subrecipient may assist in finding a subsequent purchaser. The subsequent purchaser may only purchase the property if qualified as low-income.
- v. The Period of Alfordability and the provisions of this Declaration shall be suspended upon foreclosure by a lender or other transfer in lieu of foreclosure, if the 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.
- vi. 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. Subjetting or renting is not permitted."
- vii. The Subrecipient acknowledges and agrees that at all times during the Period of Affordability, the Property shall qualify and be maintained as affordable housing as described in the HOME Program regulations (24 C.F.R. Part 92, as it may be amended).
- viii. 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.
- ix. 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.

5

- x. The covenants and restrictions set forth shall be deemed covenants running with the land and, except as provided in Paragraph 1, shall pass to and be binding upon the Sobrecipiert'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.
- xi. Upon expiration of the Period of Affordability, this Deciaration 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.
- xii. 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.
- xiii. 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.

Affordability Period

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

6

HOME FUNDS	PERIOD OF AFFORDABILITY
Less than \$15,000	5 years
\$15,000 - \$40,000	10 years
More than \$40,000	1.5 years

3. Refinance

During the period of affordability, the homebuyer shall only be permitted to refinance the property when the new interest rate is a savings of at least 1 ½ % (one and a half percent) interest rate savings over the life of the loan to the home owner and there is no cash out at closing.

C. Refinancing Guidelines for Multi-Family Housing

As referenced in the 2015-2020 City of Gastonia Consolidated Plan, the City of Gastonia/Participating Parisoletion (Pi) <u>well not</u> use HOME funds to refinance multi-family housing or single family housing during this Consolidated Plan period. This section specifically applies to multi-family housing refinance. In the event the City pecides to omend its current or future Consolidated Plan and Annual Action Plan to allow for this octivity, the following provisions would apply:

 If the City determines it will use its HOME Investment Partnership Program funds for refinancing of multi-family housing, these guidelines describe the conditions under which the City will refinance existing debts.

i. Affordability Period

The minimum period of affordability shall be lifteen (15) years. Affordability will be based upon the amount of HOME funds invested or other mitigating factors as required. Once the period of affordability is determined, it will be specified in all contractual agreements.

II. Deeming the Activity Eligible

Any multi-family housing project seeking refinance assistance must demonstrate that rehabilitation is the *primary* objective of the refinance request when determining the eligible activity. The City will evaluate the per unit cost of rehabilitation in relation to the overall refinancing costs. File records will denote the purpose of the rehabilitation, which are listed as follows:

- iii. maintain current affordable units,
- iv. to create additional affordable units or
- v. both

vi. Management Review

The City will review the overall management practices to ensure divestment has not occurred; furthermore it must be determined that the long-term needs, affordability, and feasibility of the project are met to prevent future need for refinancing the project. The review must also ensure that the target population served can be documented for the remaining affordability period of the project.

vii. Service Area

The City or Participating Jurisdiction (PJ) determines the geographic service area of projects to be within the Gastonia-Gaston Consortium area, however the geographic service area may be changed based upon an annual review conducted by the Community Development Director, at which time this document will be amended to reflect such change.

viii. Prohibited Assistance

The City or PJ cannot use HOME Investment Partnership Program loans to refinance any multi-family loans made, funded or insured by any federal program, inclusive of the Community Development Block Grant (CDBG) Program.

American Dream Down Payment Initiative (ADDI)
 The PJ will not receive ADDI funds.

8

Grantee SF-424's and Certification(s)

1.a. Type of Submission:	1.b. Frequency:	1.d. Version:		
		☐ Initial ☐ Resubmission ☐ Revision ☐ Update		
X Application	M Arruai	2. Date Received:	STATE USE ONLY:	
□ Pan	Quartery	07/31/2020	VIIIIE GGE GILET.	
Funding Request	Other	3. Applicant Identifier:	5. Date Received by State:	
Other	NORS TANKS WEST	B-20-MC-37-0006		
Other (specify)	Other (specify):			
		4s. Federal Entity Identifier:	6. State Application Identifier	
		55-6000227		
<u> </u>		4b Federal Award Identifica	-	
1.c. Consolidated Application/	Plan/Furnding Request?	4b. Federal Award Identifier: 55-6000227	1	
Yes No 🛛 No 🗎	neion			
7. APPLICANT INFORMATION				
a. Legal Name:				
City of Sastonia				
b. Employer/Texpeyer identific	ation Number (EIN/TIN):	c. Organizational DUNS:		
55-6000227	<u> </u>	074497249500C		
d. Address:				
Street1:		Street2:		
PO Box 1748				
Oby		County / Parish:		
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State:		Province:		
NC: N	WC: Worth Carolina			
Country:		Zip / Postal Code		
IARD	UNITED STATES	28053-1748		
e. Organizational Unit:		- L		
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	First Name:	Middle Name:		
Hr.	Michael .	le.		
Last Name:		Suffice		
Peoples				
Tide: City Manager				
Organizational Affiliation:				
Ofty of Castonia				

Ba. TYPE OF APPLICANT:	
	G: City or Township Government
Other (specify):	
b. Additional Description:	
9. Name of Federal Agency	r.
U.S.Department of Nou	eing and Urban Development
10. Catalog of Federal Don	nesili: Assistance Number:
14-218	
CFDA Title:	
CDBG-Entitlement	
11. Descriptive Title of App	Allrant's Drolant
	Block Grant (CDBG): Administration, Acquisition, Felt Engeling, Partnerships w/
	profits ending homelessness.
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APPLICATION FOR FEI	DERAL ASSISTANCE SF-424 - MANDATORY	
17. Is The Applicant Delinque	ent On Any Federal Debt?	
Yers No 🛇	Explanation	
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to this best of my knowledge. I also provide the required assurances* and agree to comply with any resulting terms if I accept an award. I am aware that any false, flottious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalities. (U.S. Code, Title 218, Section 1901) ** Tages ** This list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.		
Authorized Representative:		
Prefx:	First Name:	
Mrn.	Michael	
Middle Name:		
r.		
Last Name:		
Fesples		
Suffix:	Title:	
	City Managur	
Organizational Affiliation:		
City of Sastonia		
Telephone Number:		
794-866-6719		
Fax Number:		
294-854-6607		
Email:		
michaelp@cityofgamtoni	1.com	
Signature of Authorized Repre	In C. Peaples	
Date Signed:		
QB/12/202		
Attach supporting documents a	a specified in agency instructions.	





O49 Number 4546-0020 Experting Date: 0 (9 /2023

1.a Type of Submission	1.b Frequency:	1.d. Version	3600	
<u> </u>		☐ Initial ☐ Resubmission	Revision Update	
Application	Annual	2 Date Received	STATE USE ONLY	
Plan	Ouarterly	07/01/2020		
Funding Request	Other	3. Applicant Identifier	5. Date Received by State	
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Other (specify):	Other (specify);			
		4a. Federal Entity Identifier	6. State Application identifier	
	lli.	56 SU9C227		
1.c. Consolidated Application/P	Isn/Funding Request?	4b. Federal Award Identifior		
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7 APPLICANT INFORMATION		W - 5000		
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d. Address				
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Prefix: F	inst Name:	Middle Name.		
Mr. H	Lichne 1	[C		
Last Name		Suffx.	Ø. − <u>₽</u>	
Peoples	Western Western			
Tide City Manager				
Organizational Affiliation				
City of Geardia	***	Mark 1		
Telephone Number 704 866	6719	Fax Number 104 834 5607		
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OFPA Title:	
E.MS Investment Partnership Pr	ogren
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11 Descriptive Title of Applicant's Pro	yect
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17. Is The Applicant Delinque	ent On Any Federal Debt?
Yes No 🛛 📗	Explanation
are true, complete and accur resulting terms if I accept an criminal, civil, or administrat " Agree X	on, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein rate to the best of my knowledge. I also provide the required assurances** and agree to comply with any sward. I am aware that any false, flottibus, or fraudulent statements or claims may subject me to five penalties. (U.S. Code, Title 218, Section 1001) assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific
Authorized Representative:	
Prefix	First Name:
Mra.	Michael
Middle Name:	
e,	
Last Name;	
Feoples	
Suffix:	Title:
	City Manager
Organizational Affiliation:	
City of Gestonia	
Telephone Number:	
704-866-6719	
Fax Number:	
704-854-6607	
Emal:	
michaelpēcityofgaatomi	s.com
Signature of Authorized Repre	registry Reople
Date Signed:	
08/12/202	5.





Public reporting burdon for this collection of information is estimated to average 15 minutes per response including time for reviewing instructions searching extating data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042). Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY

NOTE

Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duty authorized representative of the applicant. I certify that the applicant:

- 1 Has the legal authority to apply for Federal sasistance and the institutional managerial and financial capability (including funds sufficient to pay the non Federal share of project costs) (olensure proper planning management and completion of project described in this application.
- 2 Will give the awarding agency the Comptroller General of the United States and if appropriate the State the right to exemine all records books papers or documents related to the assistance and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3 Will not dispose of modify the case of or change the terms of the real property title or other interest in the site and fecilities without permission and instructions from the awarding agency. Will moord the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-disprimination during the useful life of the project.
- 4 Will comply with the requirements of the assistance awarding agency with regard to the donfing, review and approval of construction plans and specifications.
- 5 Will provide and maintain competent and odequate engineering supervision at the construction site to easing that the complete work conforms with the approved plans and specifications and will fundship progressive reports and such other information as may be dequired by the assistance awarding agondy or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency
- 7 Will establish safaguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of pursonal or organizational conflict of interest, or personal gain.

- 8 Will comply with the Intergovernmental Personnol Act of 1970 (42 U S C §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Marti System of Personnel Administration (5 C F R. 900 Subpart F)
- 9 Will comply with the Lead-Based Peint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of fixed-based point in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to (a). Title Vi of the Civil Rights Act of 1964 (P.L. 98-352). which prohibits discrimination on the basis of race color or national origin (b) Title IX of the Education Amendments of 1972 as amended (20 U.S.C. §§1691 1683 and 1685-1686) which prohibits discrimination on the basis of sex. (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794) which prohibits discrimination on the basis of hand caps (d) the Age Discrimination Act of 1975 as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of ager (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255) as amended relating to nondiscrimination on the basis of drug abuse: (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention Treatment and Rehabilitation Act of 1970 (P.L. 91-616) as emended relating to nondiscrimination on the basis of alcohol abuse or alcoholism (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U S C §§290 dd-3 and 290 ee 3) as amended relating to confidentiality of alcohol. and drug abuse patient records. (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.) as amended relating to nondiscrimination in the sale rental or financing of housing (I) any other nondiscrimination provisions in the specific statua(s) under which application for Federal assistance is being made, and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application

Previous €dition Usable

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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-645) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment, activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Becon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard erea to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11983; (e) essurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (Identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severor forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subsevents under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE	
Mil. Of Pagale	City Manager	
APPLICANT ORGANIZATION	DATE SUBMITTED	
City of Gastonia	08/12/2020	

SF-424D (Rev. 7-97) Back



Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

☐ This certification does not apply. ☐ This certification is applicable.

NON-STATE GOVERNMENT CERTIFICATIONS

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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

- Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- Establishing an ongoing drug-free awareness program to inform employees about
 - a. The dangers of drug abuse in the workplace;
 - The grantee's policy of maintaining a drug-free workplace;
 - Any available drug counseling, rehabilitation, and employee assistance programs; and
 The penalties that may be imposed upon employees for drug abuse violations occurring in the
 - The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
 Notifying the employee in the statement required by paragraph 1 that as a condition of employment.
- Notifying the employee in the statement required by paragraph I that, as a condition of employment under the grant, the employee will
 - a. Abide by the terms of the statement; and
 - Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- 5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph.
 4(h) with respect to any employee who is so convicted.
 - 4(b), with respect to any employee who is so convicted –
 Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

CPMP Non-State Grantee Certifications

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

- 8. 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 ican, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 9. 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
- 10. 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 consolidated plan 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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 — It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official Date

Michael C. Peoples
Name

City Manager

Title

181 S. South Street

Address

Gastonia, NC 28052

City/State/Zip

704-866-6719

Telephone Number

CPMP Non-State Grantee Certifications 2

☐ This certification does not apply. ☐ This certification is applicable.	

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation — It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan — Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

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

- 11. Maximum Feasible Priority With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan 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 Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a 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);
- 12. Overall Benefit The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2018, 2019, 2020, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), 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 during the designated period;
- 13. Special Assessments It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed 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 CDBG 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 CDBG 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 CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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 CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

- 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
- 15. 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;

CPMP Non-State Grantee Certifications

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 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint — Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

Compliance with Laws - It will comply with applicable laws.

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Milw C. Feeles	08/12/2020
Signature/Authorized Official	Date

Name

City Manager

Michael C. Peoples

Title

181 S. South Street

Address

Gastonia, NC 28052

City/State/Zip

704-866-6719

Telephone Number

CPMP Non-State Grantee Certifications 4

☐ This certification does not apply. ☐ This certification is applicable.	

OPTIONAL CERTIFICATION CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan Includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a 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 to meet such needs.

Signature/Authorized Official	Date
Name	
Title	
Address	
City/State/Zip	
Telephone Number	

CPMP Non-State Grantee Certifications 5

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Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs — it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR \S 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in \S 92.214.

Appropriate Financial Assistance — before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

08/12/2020

Date

Signature/Authorized Official

Michael C. Peoples

Name

City Manager

Title

181 S. South Street

Address

Gastonia, NC 28052

City/State/Zip

704-866-6719

Telephone Number

CPMP Non-State Grantee Certifications 6



HOPWA Certifications

The HOPWA grantee certifies that:

Activities — Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building — Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

- For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
- For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official	Date
Name	
Title	
Address	
City/State/Zip	
Telephone Number	

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\boxtimes	This	certification	does not apply.
	This	certification	is applicable.

ESG Certifications

I, , Chief Executive Officer of , certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

- The requirements of 24 CFR 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
- 2. The building standards requirement of 24 CFR 576.55.
- The requirements of 24 CFR 576.56, concerning assurances on services and other assistance to the homeless.
- The requirements of 24 CFR 576.57, other appropriate provisions of 24 CFR Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
- The requirements of 24 CFR 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
- The requirement of 24 CFR 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
- The requirements of 24 CFR Part 24 concerning the Drug Free Workplace Act of 1988.
- 8. The requirements of 24 CFR 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
- The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 CFR 76.56.
- The requirements of 24 CFR 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

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authorities as specified in 24 CFR Part 58.

- 11. The requirements of 24 CFR 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
- 12. The new requirement of the McKinney-Vento Act (42 USC 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
- HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.

Signature/Authorized Official	Date	
Name		
Title		
Address		
City/State/Zip		
Telephone Number		
CPMP Non-State Grantee Certifications	9	Version 2.0

This certification does not apply.	
This certification is applicable.	
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APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who falls to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Drug-Free Workplace Certification

- By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
- The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- 3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- 4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
- If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
- 6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code). Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CPR part 21.

Place Name	Street	City	County	State	Zip
Gastonia City Hall	181 S. South St.	Gastonia	Gaston	NC	28052
Garland Municipal Business Ctr	150 S. York Street	Gastonia	Gaston	NC	28052
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7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules 1 through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of note contenders) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any

CPMP Non-State Grantee Certifications 10

controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

a. All "direct charge" employees;

b. all "indirect charge" employees unless their impact or involvement is insignificant to the

performance of the grant; and

temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

08/12/2020

Date

Note that by signing these certifications, certain documents must completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing

2. Citizen Participation Plan

3. Anti-displacement and Relocation Plan

Signature/Authorized Official	/
Michael C. Peoples	
Name	
City Manager	
Title	
181 S. South Street	
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Gastonia, NC 28052	
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704-866-6719

CPMP Non-State Grantee Certifications 11

Appendix - Alternate/Local Data Sources

Data Source Name None List the name of the organization or individual who originated the data set. N/A Provide a brief summary of the data set. N/A What was the purpose for developing this data set? N/A Provide the year (and optionally month, or month and day) for when the data was collected. N/A Briefly describe the methodology for the data collection. N/A Describe the total population from which the sample was taken. N/A Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. N/A **Data Source Name** 2019 Point in Time Count List the name of the organization or individual who originated the data set. Gaston Lincoln Cleveland Continuum of Care Provide a brief summary of the data set. Count of homeless population and subpopulations. What was the purpose for developing this data set?

How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?

The purpose of the data set is to provide a point-in-time count of people experiencing homelessness

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in the CoC counties.

What time period (provide the year, and optionally month, or month and day) is covered by this data set?

What is the status of the data set (complete, in progress, or planned)?