

Executive Summary

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

1. Introduction

The Foothills NC HOME Consortium will address the affordable housing shortage across its four-county region in Western North Carolina. McDowell County is serving as the lead entity, and is collaborating with the following towns and counties: Cleveland County, City of Kings Mountain, City of Shelby, McDowell County, City of Marion, Town of Old Fort, Polk County, City of Saluda, Rutherford County, Town of Forest City, Town of Rutherfordton, and Town of Spindale.

The Foothills Regional Commission (FRC) is providing administrative support for the Foothills NC HOME Consortium. FRC has taken the lead on the development of this Consolidated Plan, which is required by HUD to inform the allocation of HOME funds, both annually, and over a five-year period. This Plan describes both the housing needs and market supply for low-to-moderate income households, as well as special needs populations. Additionally, this Plan includes a five-year strategic plan and an annual action plan for the Consortium.

All efforts have been made to ensure a thorough and inclusive input process, with stakeholder and public meetings, interviews, and surveys. As this is a brand new initiative for the region, it is possible that some information and activities will still need to be incorporated.

The goal of the Foothills NC HOME Consortium is to provide safe and affordable housing for low-and-moderate-income persons and special needs populations across the four-county region. This Consortium will work to strengthen and expand partnerships between all levels of government in the region, and for-profit and non-profit organizations in the region, with the goal of producing, operating, and preserving affordable housing in the Foothills region.

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

Based on all of the gathered data, the primary goals of this Strategic Plan are as follows:

1. Provide for the production of new affordable housing stock in the region, both for rent and purchase, and the required infrastructure for same
2. Preserve and repair existing affordable housing
3. Alleviate cost-burden on low to moderate income households
4. Provide affordable and accessible housing for special needs households

5. Promote an expansion of housing related services and organizations in the region
6. Prevent and end homelessness

To achieve the goal of increasing the available stock of safe and affordable housing for low-to-moderate-income households and persons, the following objectives have been identified:

- Increase the supply of new rental and home ownership housing
- Preserve and rehabilitate existing housing stock
- Provide homeownership and rental assistance
- Provide special needs and homeless housing

3. Evaluation of past performance

While this Consortium is new, it is built upon years of partnership and work between the participating governments, and it will work to coordinate the efforts of an array of service providers in the region. The goals, objectives, and projects of this Consortium have been developed based on the input of regional partners and through the information provided by the needs assessment and market analysis.

4. Summary of citizen participation process and consultation process

Will be completed at end of public comment period

5. Summary of public comments

Will be completed at end of public comment period

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

Will be completed at end of public comment period

7. Summary

The Foothills NC HOME Consortium is the outcome of many conversations across our region about the need for more and better affordable housing options and opportunities across the Foothills region. This consolidated plan is the result of a robust process, and is just the first step in bringing together participating jurisdictions, housing and supportive service providers, and an array of information and data, to leverage the region's resources to address the affordable housing issues in the region.

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
HOME Administrator		Foothills Regional Commission

Table 1 – Responsible Agencies

Narrative

McDowell County, the lead agency of the Foothills NC HOME Consortium, has asked the Foothills Regional Commission to prepare the consolidated plan. McDowell County and the other participating jurisdictions provided input and insight in the development of the plan.

Consolidated Plan Public Contact Information

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

1. Introduction

We solicited a wide range of community input for this plan from participating governments and community service providers focused on affordable housing and homelessness, as well as addiction, aging, disabilities, domestic violence, health, HIV/AIDs, legal aid, veterans and workforce. We held several rounds of stakeholder meetings and conducted a stakeholder survey.

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)).

The Foothills PHA works with regional partners and stakeholders, including governmental, health, mental health, and local and regional service agencies to provide needed services to those looking for housing and related assistance.

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 primary focus in the region is to build a coordinated entry system. This includes assessments and helping individuals access resources. But coordinated reentry doesn't work if there isn't housing to move people into. CoC works with landlords, county leadership to communicate the necessity of available supportive housing.

The region's CoCs work to connect with other professional agencies and individuals working around this issue so that they can combine resources in order to meet needs and coordinate.

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 Foothills HOME Consortium does not receive ESG funding. However, during the planning process for this Plan, regional CoC and other organizations that receive ESG funding were consulted and shared their information about their services and the needs of the region's homeless population.

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	ISOTHERMAL PLANNING & DEV COMMISSON DBA FOOTHILLS REGIONAL COMMISSION
	Agency/Group/Organization Type	PHA Services - Housing Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The consultations with agencies were handled through structured interviews with follow-up questions and answers. The outcomes of these consultations yielded improved understanding of the programs and services offered by the agencies as well as their firsthand knowledge of gaps and resources that exist in our region. In addition, this outreach should result in improved coordination as the consolidated plan is undertaken and annual action plans implemented.
2	Agency/Group/Organization	Gateway Wellness Foundation
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The consultations with agencies were handled through structured interviews with follow-up questions and answers. The outcomes of these consultations yielded improved understanding of the programs and services offered by the agencies as well as their firsthand knowledge of gaps and resources that exist in our region. In addition, this outreach should result in improved coordination as the consolidated plan is undertaken and annual action plans implemented.

4	Agency/Group/Organization	PARTNERS BEHAVIORAL HEALTH MANAGEMENT
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children 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?	The consultations with agencies were handled through structured interviews with follow-up questions and answers. The outcomes of these consultations yielded improved understanding of the programs and services offered by the agencies as well as their firsthand knowledge of gaps and resources that exist in our region. In addition, this outreach should result in improved coordination as the consolidated plan is undertaken and annual action plans implemented.
12	Agency/Group/Organization	Thrive Henderson County
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The consultations with agencies were handled through structured interviews with follow-up questions and answers. The outcomes of these consultations yielded improved understanding of the programs and services offered by the agencies as well as their firsthand knowledge of gaps and resources that exist in our region. In addition, this outreach should result in improved coordination as the consolidated plan is undertaken and annual action plans implemented.

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

There were no agencies that were intentionally left out of the process and not consulted.

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		
IPDC Housing Task Force Report	Foothills Regional Commission	The development of the HUD HOME Consortium is a direct result of the goals and objectives laid out by the Task Force Report

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))

The consolidated planning process included coordination with the 12 local governments participating in the Consortium: Cleveland County, City of Kings Mountain, City of Shelby, McDowell County, City of Marion, Town of Old Fort, Polk County, City of Saluda, Rutherford County, Town of Forest City, Town of Rutherfordton, and Town of Spindale.

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**

This Section will be completed at the end of the public comment period

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section draws from two reports prepared by Bowen National Research: an 18 county housing needs assessment and market analysis prepared for Dogwood Health Trust, and a housing needs assessment prepared for Cleveland County. This section also includes data from direct engagement with regional and local service providers, and data provided by HUD.

Summary of Housing Needs:

- The biggest need in the region is for more housing stock, both for rental and homeownership
- The second largest need in the region is to rehabilitate existing housing units in order to increase the stock of available housing
- There is a need for further rental and homeownership assistance
- There is a need for housing for special needs and homeless individuals
- There is a need to educate both landlords and tenants across the region in order to facilitate better communication and increased circulation of housing units

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

Summary of Housing Needs

The following summarizes a variety of demographic data across the four Consortium counties. The CHAS (Comprehensive Housing Affordability Strategy) data for 2013-2017 was released in 2020, and is the default provided by HUD as the primary dataset for capturing needs by income level. For standard demographic data, more up-to-date sources are available and were substituted for the default data.

Demographics	Base Year: 2010	Most Recent Year: 2020	% Change
Population	231,371	239,175	3%
Households	92,787	95,862	3%
Median Income	\$36,380.00	\$44,382.00	22%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:

2020 Demographic Data

Data Source Comments:

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	10,435	10,765	15,285	9,789	38,205
Small Family Households	3,557	3,313	5,039	4,048	19,735
Large Family Households	588	608	1,117	626	2,554
Household contains at least one person 62-74 years of age	2,152	2,933	4,337	2,973	10,304
Household contains at least one person age 75 or older	1,013	2,735	2,697	1,334	3,997
Households with one or more children 6 years old or younger	1,568	1,479	2,031	1,643	3,135

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

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

	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
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	85	40	114	24	263	65	40	104	0	209
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	230	40	69	85	424	0	0	30	0	30
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	220	90	89	68	467	70	144	325	45	584
Housing cost burden greater than 50% of income (and none of the above problems)	3,229	1,238	89	53	4,609	2,038	1,279	796	329	4,442
Housing cost burden greater than 30% of income (and none of the above problems)	410	1,713	1,930	374	4,427	549	1,148	1,850	1,028	4,575

	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)	975	0	0	0	975	954	0	0	0	954

Table 7 – Housing Problems Table

Data 2013-2017 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% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,764	1,388	368	233	5,753	2,173	1,459	1,273	374	5,279
Having none of four housing problems	1,172	2,920	5,014	2,971	12,077	1,373	4,989	8,655	6,224	21,241
Household has negative income, but none of the other housing problems	975	0	0	0	975	954	0	0	0	954

Table 8 – Housing Problems 2

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	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	1,688	1,179	744	3,611	867	752	1,054	2,673
Large Related	354	234	110	698	130	105	194	429
Elderly	722	926	514	2,162	872	1,227	969	3,068

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	1,294	692	752	2,738	794	378	498	1,670
Total need by income	4,058	3,031	2,120	9,209	2,663	2,462	2,715	7,840

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	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	1,548	479	10	2,037	782	519	271	1,572
Large Related	274	84	0	358	80	55	50	185
Elderly	522	433	134	1,089	593	433	353	1,379
Other	1,184	280	25	1,489	615	269	119	1,003
Total need by income	3,528	1,276	169	4,973	2,070	1,276	793	4,139

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	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
NUMBER OF HOUSEHOLDS										
Single family households	390	125	84	158	757	30	119	285	45	479
Multiple, unrelated family households	60	4	70	15	149	40	25	70	0	135
Other, non-family households	0	0	4	0	4	0	0	0	0	0
Total need by income	450	129	158	173	910	70	144	355	45	614

Table 11 – Crowding Information - 1/2

Data 2013-2017 CHAS
Source:

	Renter				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.

In 2020, single person households (HH) made up 42% of all renter HH, and 39% of all owner HH. This percentage is expected to stay consistent over the next five years, which indicates that there is a large need for single person and single family homes in the region, both in the rental and owner markets. Based on feedback from regional stakeholders, there is also a shortage of housing options for individuals with special needs (homelessness, re-entry, veterans, individuals with substance use disorders, etc), which are likely single person 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.

According to the local PHA, there are 194 disabled individuals on the Section 8 waiting list (out of 929 individuals on the waiting list). The Housing Department does not track domestic violence, dating violence, sexual assault, or stalking.

According to data provided by the Batterer Intervention Program of North Carolina (2020 - 2021 data), 247 reports of domestic violence, dating violence, sexual assault, and stalking were reported in the four county consortium region. 83% were women, and 86% were over 18 years of age.

McDowell County shelters usually see 15-20 families each year that are victims of domestic violence, dating violence, sexual assault and/or stalking. Typically, these are women or women with children. These families are difficult to house because they're afraid to be out on their own. They frequently move from shelter to shelter. This statistic is representative of the region as a whole.

What are the most common housing problems?

Housing cost burden is the most common housing problem in the region, as the data above indicates. Both the 30% and 50% cost burden levels show the problem for the region, indicating that at least 27% of households across the region are cost burdened. This is combined with a lack of affordable housing supply, thus increasing the housing cost burden.

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

Looking at cost burden, there are slightly more cost burdened rental households compared to owner households. Within these groups, the types of households are fairly consistent (Small Related, Elderly, Other) and are similarly affected, with the exception of Large Related, which doesn't have the same numbers as the other groups.

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

Most of them are low-income. Many had nothing except the clothes on their backs. Many are just one check away from being homeless again.

Some in the region have moved into Section 8, where there is a subsidy, but some families could not transfer over due to things like criminal background or had been Section 8 before and are no longer eligible. These are the most at risk of returning to homelessness.

These households vary in race, vary in age; there are some two-parents and some single-parent families.

Many are unemployed. Many receive social security or disability but do not have enough money for downpayment or other up-front fees. Many don't have good family relationships and don't have a support system of friends or family. Some of them have had some kind of mental health issues and some but not most have had addiction issues, whether it be alcohol or drugs.

Common needs include the need for quality employment, supportive services and case management, mental health or addiction assistance, peer support, transportation, budgeting assistance and counseling. Many need a higher income to qualify for assistance. Some need help with back taxes or repairs to homes that are becoming uninhabitable.

Low-income individuals who are at risk of losing housing are often people who are either not able to keep stable employment due to some type of mental health concern or substance use disorder or, if they're able to keep employment, it's unstable or not sufficient as far as wages go and they find themselves in a situation with a general lack of resources.

76% of Low-Income renters needing federal rental assistance nationwide don't receive it. Rapid re-housing is supposed to help the most vulnerable get housed, but they're finding that the services just aren't comprehensive enough for the allotted time frame. The region needs to develop a standard for something that actually works from a case management and services/resources perspective. These folks need more than just a follow up call.

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:

N/A

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

Cost burden and affordable housing supply are the two main issues that are linked to housing instability in this region.

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 and the following two sections break down housing problems by both income level and race and ethnicity. To calculate disproportionate greater need by race and ethnicity, each row is summed across the three columns, then the first column (Has one or more of four housing problems) is divided by that sum and multiplied by 100 to get a percent for the jurisdiction as a whole, as well as for each specific race/ethnicity. These percentages are then compared to see if any is 10% or higher than the jurisdiction as a whole percentage. For example, the total number of households in the 0%-30% AMI category is 11,160. The total number of households with one or more housing problems is 7,405, which is 66%. By race, White is 64%, Black/African American is 76%, Asian is 100%, American Indian/Alaska Native is 100%, Pacific Islander is 0%, and Hispanic is 63%. These numbers indicate that Black/African American, Asian, and American Indian/Alaska Native households in this category experience a disproportionate amount of housing problems when compared to the jurisdiction as a whole, and other races. It is important to note however that the small sample sizes for Asian, American Indian/Alaska Native, and Pacific Islander have the potential for large margins of error, which may skew the information.

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	7,405	1,695	2,060
White	5,215	1,555	1,435
Black / African American	1,785	120	450
Asian	39	0	0
American Indian, Alaska Native	74	0	0
Pacific Islander	0	0	15
Hispanic	235	25	114
0	0	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

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	6,235	5,390	0
White	4,515	4,470	0
Black / African American	1,375	2,510	0
Asian	50	0	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	185	218	0
0	0	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

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	6,020	10,465	0
White	4,420	8,815	0
Black / African American	1,115	1,430	0
Asian	130	10	0
American Indian, Alaska Native	24	10	0
Pacific Islander	0	0	0
Hispanic	273	158	0
0	0	0	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

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	2,160	8,450	0
White	1,635	6,925	0
Black / African American	445	1,039	0
Asian	4	14	0
American Indian, Alaska Native	45	0	0
Pacific Islander	0	10	0
Hispanic	150	425	0
0	0	0	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

Discussion

Reviewing each of these tables, there is no overarching pattern that can easily be discerned. However, a few facts do stand out. The White ethnic group is consistently 2% or more below the average jurisdictional percentage of families experiencing housing problems across all categories. The Black/African American ethnic group is at or above the average jurisdictional percentage in all categories except 30%-50% AMI. The Asian ethnic group experiences housing problems disproportionate to the jurisdiction as a whole in all categories except for 80%-100% AMI. The Hispanic ethnic group roughly equals the jurisdictional percentages except in the 50%-80% AMI category, in which it is experiencing a disproportionate housing problem. The American Indian/Alaska Native ethnicity faces a disproportionate housing problem in all categories except for 30%-50% AMI, while the Pacific Islander ethnicity doesn't experience housing problems in any category. The small sample size for these last two ethnicities indicate a potentially large margin of error.

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 follows the same approach as NA-15 in terms of calculating disproportionately greater need.

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	6,360	2,745	0
White	4,495	2,275	0
Black / African American	1,555	360	0
Asian	19	20	0
American Indian, Alaska Native	19	55	0
Pacific Islander	0	0	0
Hispanic	225	30	0
0	0	0	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

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	3,160	8,455	0
White	2,330	6,660	0
Black / African American	640	1,380	0

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
Asian	25	25	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	140	264	0
Other	0	0	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

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	1,855	14,630	0
White	1,445	11,795	0
Black / African American	139	2,405	0
Asian	60	80	0
American Indian, Alaska Native	24	10	0
Pacific Islander	0	0	0
Hispanic	180	263	0
Other	0	0	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

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	695	9,930	0
White	515	8,020	0
Black / African American	104	1,374	0
Asian	4	14	0
American Indian, Alaska Native	45	0	0
Pacific Islander	0	10	0
Hispanic	0	440	0
Other	0	0	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:

CHAS 2013-2017 Download

Data Source Comments:

*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%

Discussion

Both Black/African American (81%) and Hispanic households (88%) in the 0-30% AMI category experience severe housing problems disproportionate to the jurisdiction as a whole (70%). This stays consistent for the Hispanic households through both the 30%-50% AMI and 50%-80% AMI categories, but not in the 80%-100% AMI category. The Asian ethnic group faces severe housing problems in all categories except the 0-30% AMI, and the American Indian/Alaska Native ethnic group faces severe housing problems in the 50%-80% AMI and 80%-100% AMI categories.

Although not consistent across all measures, and taking into account the small sample size for some ethnic groups, it appears that there is a pattern wherein Black/African American, Asian, and Hispanic ethnic groups are disproportionately impacted by housing problems.

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

The following table summarizes cost burden across all 4 consortium counties, as well as by race and ethnicity.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	66,338	11,629	10,495	2,095
White	58,155	8,695	7,885	1,520
Black / African American	5,840	2,420	2,255	450
Asian	268	175	50	0
American Indian, Alaska Native	230	55	45	0
Pacific Islander	10	0	0	15
Hispanic	1,835	284	520	110

Table 21 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:
CHAS 2013-2017 Download
Data Source Comments:

Discussion

Looking at the entire jurisdiction, 13% of the population is cost burdened (30-50%), and 12% is severely cost burdened (>50%). The Asian ethnic group exceeds the 10% disproportionate threshold in the 30-50% category, while the Black/African American ethnic group is 9% over the average amount in both the 30-50% and >50% categories. This table continues to show that both the Black/African American and Asian ethnic groups face housing challenges.

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?

Across several income categories the Black/African-American ethnic group faces a disproportionately greater need than the needs of those income categories as a whole. The Asian population consistently shows a greater need, but these numbers must factor in the small sample size. Cost burden is the most common issue, which affects most of the income levels.

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

Additional housing needs have not been assessed at this time.

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

These groups can be found across the entire region.

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

Introduction

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	564	1,337	48	1,284	0	0	0

Table 22 - Public Housing by Program Type

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

Alternate Data Source Name:

PHA Survey

Data Source Comments:

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	0	4	0	0	0	0	0	
# of Elderly Program Participants (>62)	0	0	172	231	3	228	0	0	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of Disabled Families	0	0	121	376	6	370	0	0
# of Families requesting accessibility features	0	0	564	1,337	48	1,284	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

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	208	452	27	425	0	0	0
Black/African American	0	0	353	882	21	856	0	0	0
Asian	0	0	2	1	0	1	0	0	0
American Indian/Alaska Native	0	0	1	0	0	0	0	0	0
Pacific Islander	0	0	0	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

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

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	11	9	1	8	0	0	0
Not Hispanic	0	0	553	1,328	47	1,276	0	0	0

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

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:

There is a large need for more housing, as the local PHA HCV program waiting list always fills up quickly when it is opened. Demand is so high because there are not enough housing units that accept the vouchers, leaving many people without housing options.

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?

The region does not have public housing. All Section 8 individuals and families are assisted through tenant-based housing vouchers. There are 861 families on the Section 8 waiting list. Types of families on the list include single adults (18 years of age or older), elderly individuals and couples, disabled families, and families with children.

The greatest need is for more affordable rental housing. In the more rural areas of the region, transportation is needed to get out and look for housing, and to access a wider array of resources, services, and employment options.

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

The need for more affordable rental housing is the same across the region. Affordable housing for purchase is also a major housing need in the region.

Discussion

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

Introduction:

Rural homeless populations are typically less visible and harder to identify than those in urban areas, and may live in remote wooded areas, along railroad right of ways and waterways. Many also are housing insecure, and may live day to day with relatives and friends, so do not meet HUD's definition of homeless. The point in time (PIT) count data below is likely only a fraction of the unsheltered population in the region; however, it does provide a baseline of need.

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):

Data on the rural homeless populations in the four-county consortium region can be difficult to quantify, and the data is often incomplete or out of date. For instance, between October 1st, 2020 and September 30 2021, Cleveland County reported a total of 505 homeless individuals, and 310 households. This is the most current data however, and most likely is incomplete. There are organizations that assist the homeless populations of each county, but there is a large need for assistance and not enough organizations, which results in a lack of data tracking. Several homeless shelters have closed in recent years as well, resulting in a loss of a safe space for homeless individuals, and a loss of data tracking ability.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
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
Not Hispanic	0	0

Data Source
Comments:

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

This number can be difficult to quantify, as many of these families live with others in the region and move around.

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

The population of the region as a whole is primarily white, which is also true for the homeless population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

There is a sizeable number of unsheltered and sheltered homeless individuals and families in the region, many of whom cannot find either short-term or long-term assistance.

Discussion:

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

Introduction

In addition to victims of violence and people with HIV/AIDS which are discussed in Section NA-10 and below respectively, HUD defines special needs populations as those who are:

- Elderly (62 and older);
- Frail elderly (an elderly person who requires assistance with three or more activities of daily living (ADL) such as bathing, walking, and performing light housework);
- Persons with mental, physical, and/or developmental disabilities;
- Persons with alcohol or other drug addiction.

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly

Disabilities

Substance Use Disorder

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

There is a lack of housing and supportive services for these populations.

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

According to the 2019 NC HIV Surveillance Report, there are 367 people in the four-county region currently diagnosed with HIV (183 with AIDS). The report does not break down the characteristics on the county level. It does so on a regional basis, with the Foothills counties incorporated in Region 1 with 14 other counties of western North Carolina. Demographic data for Region 1 shows that 78% are male, 20% are female, 64% are white, 25% are Black/African American, 6% are Hispanic, 3% are multiple races, and 0.6% are American Indian.

The WNC AIDS Project is currently helping 56 clients across the region. The demographic breakdown for these clients are as follows:

- 14 clients between ages of 24-35
 - 14 clients between ages of 36-45
 - 11 clients between ages of 46-55
 - 16 clients between ages of 56-65
 - 1 client who is 65+
-
- 17 of these 55 clients identify as Female
 - 38 identify as Male
 - 1 client identifies as Transgender (Male to Female)
-
- 2 clients identify as American Indian/Alaskan Native
 - 40 clients identify as Black or African American
 - 3 clients identify as Hispanic
 - 11 clients identify as White or Caucasian
-
- 21 individuals identify as homosexual
 - 34 identify as heterosexual
 - 1 declined to report
-
- Of these clients:
 - 1 is homeless and on the street
 - 2 are either incarcerated or in inpatient treatment long term
 - 10 are living with friends/relatives
 - 8 are in homes that they and/or their spouse or partner own
 - 27 are in rental housing--it is possible that some of these folks are in subsidized housing like section 8, but there unfortunately is no efficient way to gather that information at this time.
 - 7 individuals are participating in the WNC AIDS Project's subsidized rental program, HOPWA TBRA
 - 2 clients are unstably housed--they are currently in housing but facing imminent eviction

Discussion:

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The consortium region does not have any public housing facilities.

How were these needs determined?

N/A

Describe the jurisdiction's need for Public Improvements:

N/A

How were these needs determined?

N/A

Describe the jurisdiction's need for Public Services:

N/A

How were these needs determined?

N/A

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

This section combines input from Bowen National Research, analysis of US Census data, and secondary sources such as CHAS and ACS data provided through the IDIS Consolidated Plan template, as well as information collected through stakeholder and public outreach.

MA-10 Housing Market Analysis: Number of Housing Units - 91,410, 91.210(a)&(b)(2)

Introduction

This section describes the number of housing units, based on default data provided by HUD, as well as additional input from Bowen National Research. When looking at the number of residential properties versus the number of owners and renters, it is important to keep in mind that many units are seasonal.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	69,880	69%
1-unit, attached structure	993	1%
2-4 units	3,681	4%
5-19 units	2,487	2%
20 or more units	1,328	1%
Mobile Home, boat, RV, van, etc	22,610	22%
Total	100,979	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	53	0%	865	3%
1 bedroom	1,305	2%	2,557	10%
2 bedrooms	13,155	22%	11,110	44%
3 or more bedrooms	44,806	75%	10,630	42%
Total	59,319	99%	25,162	99%

Table 27 – Unit Size by Tenure

Data Source: 2013-2017 ACS

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

According to Bowen National Research, there are 23 multifamily rental tax-credit properties across the region, with a total of 1,039 units, but only 28 vacancies. The survey data was not further broken down by unit type or income level.

Virtually all affordable rentals (Tax Credit and government subsidized) are occupied, indicating that households with low or very low incomes have extremely limited options.

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

Tax credit properties may lose affordability after their 15-year credit period. Section 8 properties are in peril due to the increasing market-rate value of the properties, making it likely that landlords will be tempted to rent properties at market-rate instead of accepting HUD vouchers.

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

No. There is a tremendous need for housing units across the region and for all populations.

Describe the need for specific types of housing:

There is a need for all types of housing. While most of the housing in the region consist of 1-unit detached structures, there is a severe lack of available housing for both rental and purchase. Based upon the data and information gathered from stakeholders and the public, there is need for single-family homes and apartments for all types of populations, from low-income, workforce, single and multi-family, to senior housing.

Discussion

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

Introduction

This section reinforces the housing access and affordability issues discussed throughout this plan.

Cost of Housing

	Base Year: 2010	Most Recent Year: 2019	% Change
Median Home Value	132,242	0	(100%)
Median Contract Rent	610	713	17%

Table 28 – Cost of Housing

Data Source Comments:

Rent Paid	Number	%
Less than \$500	2,800	0.0%
\$500-999	12,000	0.0%
\$1,000-1,499	3,000	0.0%
\$1,500-1,999	600	0.0%
\$2,000 or more	150	0.0%
Total	18,550	0.0%

Table 29 - Rent Paid

Data Source Comments:

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,800	No Data
50% HAMFI	5,500	3,500
80% HAMFI	12,000	11,000
100% HAMFI	No Data	16,000
Total	19,300	30,500

Table 30 – Housing Affordability

Data Source Comments:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	558	573	710	905	1,101
High HOME Rent	602	623	739	955	1,049

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Low HOME Rent	512	548	658	760	848

Table 31 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

No, there is a severe lack of housing for households at all income levels.

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

Affordability is likely to decrease, as current market and economic trends are causing all housing to increase in cost.

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

Median rents tend to be higher than HOME and FMR rents, and this trend is only increasing

Discussion

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

Introduction

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

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	11,363	19%	10,045	40%
With two selected Conditions	248	0%	628	3%
With three selected Conditions	20	0%	15	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	47,710	80%	14,465	58%
Total	59,341	99%	25,153	101%

Table 32 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	10,304	17%	2,511	10%
1980-1999	19,975	34%	9,018	36%
1950-1979	21,553	36%	10,126	40%
Before 1950	7,467	13%	3,531	14%
Total	59,299	100%	25,186	100%

Table 33 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	29,020	49%	13,657	54%
Housing Units build before 1980 with children present	6,062	10%	3,590	14%

Table 34 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 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 35 - Vacant Units

Data Source: 2005-2009 CHAS

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

Much of the housing stock in the region was built over 50 years ago. This indicates that a good portion of the housing in the region likely needs some type of repair. Additionally, with a large and growing sector of the region's population aged 55 or above, accessible retrofits are also a high priority to enable people to age in place. Stakeholders also discussed the need for housing rehabilitation for people who have been hospitalized when a requirement of release of medical care is home modifications that are often too costly for patients.

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

Based on the available data, it is likely that 50% of the homes that are affordable to low or moderate income families could contain LBP.

Discussion

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

Introduction

The need for publicly assisted housing constantly outweighs the supply. The Foothills PHA routinely has a waitlist in the hundreds for the HCV program on an annual basis.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	572	1,378	116	1,262	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – 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 no public housing developments in the region.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

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

There are no public housing developments in the region.

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

There are no public housing developments in the region.

Discussion:

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

Introduction

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)	150	0	75	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 38 - 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 several health and mental care providers in the region, but there still remains a gap in service and a large gap in available supportive housing.

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.

There are street outreach programs to reach unsheltered people and assess their needs as well as connect them with resources. There are several jurisdictions that are looking into setting up Homelessness Task Forces to assess community wide needs.

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

Introduction

Much of the discussions with stakeholders focused on special needs populations and the general consensus is that appropriate housing is in even shorter supply than generally affordable housing.

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 most dire need is for transportation to medical care, behavioral health care, and substance use treatment. This is a huge need especially in rural parts of the region.

These individuals also need access to food and/or transportation to get food as well as increased access to behavioral health care and substance use treatment and telehealth options.

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

There is a coordinated entry program in Cleveland County that aims to provide individuals a streamlined path to supportive housing, based on need, but it has been in development for several years and has not been fully realized.

In McDowell County, those leaving mental health institutions are guided by an ACTT (assertive community treatment team) intensive adult team that will try to house them under TCLI (which is embedded at for-profit mental health places). However, they will often end up in a shelter, and the ACTT team will continue medicating them. There are no options for those exiting a physical health stay.

This is a gap that needs to be filled region wide. Individuals leaving these institutions are in the same system as everyone else, but have additional needs that should be taken into account. This is where a lot of individuals fall through the cracks.

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)

The primary goals of this plan involve increasing the supply of available housing, which will help these special needs populations. Additionally, the Foothills HOME Consortium will work with partners to expand services, and look to develop new non-profit agencies that can provide services.

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))

The primary goals of this plan involve increasing the supply of available housing, which will help these special needs populations. Additionally, the Foothills HOME Consortium will work with partners to expand services, and look to develop new non-profit agencies that can provide services.

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

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

There are a wide range of policies that can affect housing affordability. Restrictive single-family zoning is currently being re-evaluated in several states and communities across the country, as this can limit the housing density increases that are needed to increase housing supply and lower costs. In some areas, a lack of zoning creates its own set of challenges since there are not clearly defined rules, and residents can organize and challenge new developments in an ad-hoc fashion. Limits on manufactured housing and accessory dwelling units (ADUs) also create barriers to affordable housing.

Another important public policy, set at the federal level, is the Fair Market Rent, which is the basis for payment amounts for several HUD rental and housing assistance programs. Stakeholders cited the mismatch between FMR and actual rents as an issue.

In general, market-drivers (i.e., the cost and availability of land, labor and materials; available financing; real estate transaction costs) were more often cited as having a significant impact on affordable housing development.

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

Introduction

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	901	951	1	1	0
Arts, Entertainment, Accommodations	1,100	1,129	2	2	0
Construction	3,000	5,141	5	7	2
Education and Health Care Services	9,600	10,735	15	15	0
Finance, Insurance, and Real Estate	1,300	1,319	2	2	0
Information	800	1,179	1	2	1
Manufacturing	13,000	15,570	20	22	2
Other Services	5,000	5,230	8	7	-1
Professional, Scientific, Management Services	1,850	1,917	3	3	0
Public Administration	14,000	14,074	22	20	-2
Retail Trade	9,500	9,797	15	14	-1
Transportation and Warehousing	3,300	3,413	5	5	0
Wholesale Trade	1,500	1,596	2	2	0
Total	64,851	72,051	--	--	--

Table 39 - Business Activity

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

Labor Force

Total Population in the Civilian Labor Force	102,829
Civilian Employed Population 16 years and over	191,883
Unemployment Rate	4.10
Unemployment Rate for Ages 16-24	4.42
Unemployment Rate for Ages 25-65	4.20

Table 40 - Labor Force

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	6,875
Farming, fisheries and forestry occupations	631
Service	12,486
Sales and office	16,880
Construction, extraction, maintenance and repair	3,997
Production, transportation and material moving	18,581

Table 41 – Occupations by Sector

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	84,662	80%
30-59 Minutes	21,000	20%
60 or More Minutes	161	0%
Total	105,823	100%

Table 42 - Travel Time

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	24,009	2,640	18,000

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	53,731	1,307	10,000
Some college or Associate's degree	57,737	121	8,400
Bachelor's degree or higher	33,019	159	220

Table 43 - Educational Attainment by Employment Status

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	0	0	0	0	0
9th to 12th grade, no diploma	0	0	0	0	0
High school graduate, GED, or alternative	0	0	0	0	0
Some college, no degree	0	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	0	0	0	0	0
Graduate or professional degree	0	0	0	0	0

Table 44 - Educational Attainment by Age

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	31,300
High school graduate (includes equivalency)	40,450
Some college or Associate's degree	44,950
Bachelor's degree	66,700
Graduate or professional degree	78,700

Table 45 – Median Earnings in the Past 12 Months

Alternate Data Source Name:

ACS 2015-2019

Data Source Comments:

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

The major employment sectors are manufacturing, healthcare, and government.

Describe the workforce and infrastructure needs of the business community:

Regional industry sectors are in constant need of workers, across all sectors.

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.

There are not enough workers to meet the demands of business in the region, specifically in the manufacturing sector.

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

The region is blessed with three strong community colleges that provide workforce training for regional industries, along with a Workforce Development Board that engages with industry and the community colleges to identify training needs.

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 regional Workforce Board oversees the three regional NCWorks Career Centers, which help individuals find employment. The NCWorks Career Centers will engage with the HOME Consortium and partners to help identify employment opportunities for individuals who need housing assistance and employment assistance.

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

Yes

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.

Yes, through the Foothills Regional Commission. The regional CEDS recognizes the need for housing as a major priority for economic sustainability and growth in the region. The Foothills Regional Commission

is currently updating its CEDS, and will be coordinating with HOME Consortium to integrate the goals of the Consolidated Plan with the new five-year CEDS.

Discussion

MA-50 Needs and Market Analysis Discussion

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

No, they are spread out across the entire region.

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

No, they are spread out across the entire region.

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

Unemployment in the region is around the state average, with a range of industries, with manufacturing and healthcare being the largest industry sectors in the region.

Are there any community assets in these areas/neighborhoods?

This is hard to generalize across entire communities, as all have community assets - schools, parks, cultural identities, economic opportunities, etc. If anything, it is the attractiveness of the region, both in terms of its natural and cultural amenities, that creates housing supply and affordability issues.

Are there other strategic opportunities in any of these areas?

The location of the region lends itself towards identification as a regional logistical hub, which could spur economic growth and job growth. This strategy will be developed in the new regional CEDS.

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.

Broadband has become an essential infrastructure component like water, sewer and power. It could be considered an “umbilical cord” to the world. Low and moderate income households have historically been underserved broadband areas because most communities rely on for-profit providers to serve broadband needs. Naturally, for-profit providers will focus on the most profitable areas to serve. Low and moderate income households and neighborhoods also may not be able to afford service or don’t have the educational background to utilize the service.

The impacts of COVID highlighted the need for broadband, making it clear how necessary high-speed internet is for people to perform their jobs, complete school work, and access vital resources like healthcare and social services.

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

Broadband is no different from other services or offerings in this regard. A monopoly leads to higher prices and lower service levels. History has shown that to be true. With broadband it’s made worse by providers who are the only option in an area and refuse to enhance services or even abandon them entirely.

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

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

Severe winter weather, thunderstorms, high winds, flooding, landslides, wildfire and drought are all climate-related hazards with a high or moderate risk of occurring. The primary climate stressors are heavy precipitation events and temperature variability.

Overall, trends in precipitation are changing not only in the Southeast but nationwide, and contribute to hazards such as flooding and landslides. The frequency of extreme heavy precipitation events (once in a five-year period) in the contiguous United States is increasing compared to the twentieth-century average. Also, according to the third National Climate Assessment, from 1958 to 2012 the Southeast region experienced a 27 percent increase in the heaviest one percent of precipitation events. These national and regional trends show the importance of considering how extreme precipitation events impact communities.

The average temperature for the region has been increasing since the mid-1980s; however, the increase is variable rather than a steady, year-to-year progression. This is the normal signature for cities across the Southeast: the trend shows an increase, with annual variability being the norm. The number of very warm nights is increasing. From the mid-1940s to the mid-1990s, the number of warm nights during each five-year period was comparatively low; however, the number of very warm nights has risen since 2005. Because of this, many air conditioning systems now run continuously during many parts of the summer. Warmer summer nights will impact not only vulnerable populations—who may not be able to afford to cool their homes—but also put an increased demand on power providers.

The Palmer Hydrological Drought Index for the area indicates that droughts are becoming more frequent and more severe. Increasing drought also increases the threat of wildfire, which further exacerbates landslide risk as well. The peak wildfire season in western North Carolina is typically September through early December. Wildfire has a large impact on businesses and homes located in the wildland-urban interface. Additionally, smoke from wildfires impacts air quality, which in turn impacts public health.

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

Those in housing occupied by low- and moderate-income households are in severe risk should they be hit by any natural hazard. Many of these households struggle with maintaining a solid household income, and any disaster would have detrimental effects on their ability to both find new housing options and financially secure new housing options.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This five-year Strategic Plan is the end result of an extensive outreach and engagement effort conducted by McDowell County and the Foothills Regional Commission. It is based on data collected through surveys, one-on-one discussions, public input, partner meetings, and research. This plan addresses the pressing housing needs of the Foothills region, particularly supply, affordability, and assistance programs.

Based on all of the gathered data, the primary goals of this Strategic Plan are as follows:

1. Provide for the production of new affordable housing stock in the region, both for rent and purchase, and the required infrastructure for same
2. Preserve and repair existing affordable housing
3. Alleviate cost-burden on low to moderate income households
4. Provide affordable and accessible housing for special needs households
5. Promote an expansion of housing related services and organizations in the region
6. Prevent and end homelessness

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

Geographic Area

Table 46 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The need for increased affordable housing is found across all four counties in the region, with all counties facing a severe lack of available affordable housing. There is also a lack of available infrastructure (water, sewer, etc), in many of the more rural areas of each county, which increases the difficulty in developing new areas of land for new housing development.

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

Priority Needs

Table 47 – Priority Needs Summary

1	Priority Need Name	Develop New Housing - Both Rental and for purchase
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	New Construction of Rental Housing New Construction for Home Ownership Homeless Housing

	Description	<p>Increase the affordable housing supply</p> <ul style="list-style-type: none"> • Maximize use of the Low-Income Housing Tax Credit and other programs • Leverage HOME funds to support new developments • Prioritize developments that provide housing to very low to low income people • Encourage development of “missing middle” housing options (duplex, triplex, condominium) in addition to single-family developments • Support in-fill development • Prioritize developments that provide special needs housing • Promote energy efficient construction • Expand options for people to use Housing Choice Vouchers
	Basis for Relative Priority	<p>The overall lack of housing, both rental and for purchase, is affecting nearly all levels of income and nearly all demographics. There is a persistent lack of affordable supply due to a decade of decreased construction in the region, available land, costs of supplies, availability of contractors and laborers, and the attractiveness of the region to people owning second-homes, and for tourism and landlord preference for vacation rentals. The lack of overall supply is currently driving up rental prices, making it difficult for renters and HCV clients to find housing.</p>
2	Priority Need Name	<p>Preserve and improve existing housing</p>
	Priority Level	<p>High</p>

<p>Population</p>	<p>Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence</p>
<p>Geographic Areas Affected</p>	
<p>Associated Goals</p>	<p>Housing Rehabilitation Homeless Housing</p>
<p>Description</p>	<p>Increase housing rehabilitation efforts to increase rental and ownership housing available and affordable</p> <ul style="list-style-type: none"> • Prioritize emergency repair programs, particularly for elderly and special needs households • Support rehabilitation of existing affordable rental housing in exchange for long-term affordable rent commitments for low-income households. • Support jurisdictional programs to foreclose on vacant properties neglected by owner and provide funding for rehabilitation/resale of said properties • Expand options for people to use Housing Choice Vouchers

	Basis for Relative Priority	There is a large number of existing housing units that are in need of repair, both owner-occupied and rental units. Rehabilitating these units will allow for greater use of these units, and a greater ability to sell and rent these units, thereby increasing the housing stock of the region.
3	Priority Need Name	Provide special needs housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	New Construction of Rental Housing New Construction for Home Ownership Housing Rehabilitation Rent Assistance Homeownership Assistance Homeless Housing

	Description	<p>Provide affordable and accessible housing to persons with special needs, including the elderly and frail elderly, the homeless, persons with criminal records and substance use disorders, persons with mental and physical disabilities, and victims of domestic violence</p> <ul style="list-style-type: none"> • Increase the number of organizations providing supportive services to persons with special needs • Provide Tenant-Based Rental Assistance (TBRA) to assist in permanently housing people who are homeless • Prioritize developments that include permanent housing for homeless persons and use best practices in homelessness prevention and rapid rehousing • Prioritize locationally efficient sites • Prioritize developments that provide interior and exterior accessibility for disabled occupants and “visitability” for guests • Provide housing for persons with a wide-range of disabilities, and track how persons with disabilities are served • Remove or find alternatives for barriers to accessible housing, such as credit requirements and prior criminal record checks • Provide adequate housing options for victims of domestic violence
	Basis for Relative Priority	There are existing supportive service providers for special needs populations in the region, but not enough of them to properly serve the region, and there is a lack of housing options for these populations.
4	Priority Need Name	Promote Homeownership
	Priority Level	Low
	Population	<p>Low Moderate Large Families Families with Children Elderly Families with Children Persons with HIV/AIDS Victims of Domestic Violence Elderly Persons with HIV/AIDS and their Families Victims of Domestic Violence</p>

	Geographic Areas Affected	
	Associated Goals	New Construction for Home Ownership Homeownership Assistance
	Description	<p>Increase the affordable housing supply and promote homeownership assistance programs</p> <ul style="list-style-type: none"> • Promote affordability of home ownership • Require and monitor affirmative marketing of homeownership programs to minority homebuyers • Support organizations and programs that prepare people for homeownership • Encourage development of “missing middle” housing options (duplex, triplex, condominium) in addition to single-family developments • Support in-fill development • Support cost-effective starter home development, including building smaller houses • Provide assistance with down payments and closing costs
	Basis for Relative Priority	
5	Priority Need Name	Educate Landlords and Tenants
	Priority Level	Low

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Housing Rehabilitation Rent Assistance Homeownership Assistance
	Description	Assist landlords in understanding HUD requirements to increase participation in voucher programs. Provide tenant education on general home maintenance, financial management and related activities, in order to improve tenant-landlord relationships
	Basis for Relative Priority	Educating landlords about HCV and related programs will help to increase the availability of rental units in region. Educating tenants will improve relations and lead to increased utilization of available rental units
6	Priority Need Name	Prevent and end homelessness
	Priority Level	Low

Population	Extremely Low Low Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly
Geographic Areas Affected	
Associated Goals	New Construction of Rental Housing New Construction for Home Ownership Housing Rehabilitation Rent Assistance Homeownership Assistance Homeless Housing
Description	Homelessness is an issue in the region and is addressed separately from other special needs in HUD programs.
Basis for Relative Priority	It will not be possible to provide homes for the homeless unless the region first increases its available stock of housing, which is why this priority is listed where it is.

Narrative (Optional)

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	This region has a low level of available rental units, and a high number of low and moderate income cost-burdened households. TBRA has the capability to end economic-related homelessness, and in sustaining gains made by formerly chronic homeless persons. The challenge will be in locating available units at Fair Market Rate (FMR).
TBRA for Non-Homeless Special Needs	Special needs households have a difficult time finding housing in a tight rental market. Fair housing laws only cover people with disabilities, and landlords can discriminate on the basis of other factors and may perceive special needs as a higher risk.
New Unit Production	The lack of available affordable housing across the region affects households at all income levels. The challenges include availability of land, cost, lack of builders, labor, and supplies.
Rehabilitation	The current national supply chain crisis make rehabilitation expensive and time consuming, and there are not enough providers in the region. It is important for this region to rehab existing homes however, to raise the level of available rental and homeownership units.
Acquisition, including preservation	Both construction of new units and preservation/rehabilitation of existing units are needed.

Table 48 – Influence of Market Conditions

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	815,652	0	0	815,652	3,262,608	\$815,652 was the allocation in year 1 and we assume four additional years of similar funding for the con plan
HUD-VASH	public - federal	TBRA	0	0	0	0	0	
LIHTC	public - federal	Multifamily rental new construction	0	0	0	0	0	

Table 49 - 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

HUD HOME funds will be utilized to leverage private investment in development of affordable housing. Local participating jurisdictions will provide the matching requirement for projects within their jurisdiction. Funding will be sought from Dogwood Health Trust and other local funders for specific projects and programs that assist in achieving the goals of this Strategic Plan.

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

N/A

Discussion

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 Type	Role	Geographic Area Served
MCDOWELL COUNTY	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
CITY OF MARION	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
Town of Old Fort	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
CLEVELAND COUNTY	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
CITY OF SHELBY	Government	Homelessness Non-homeless special needs Ownership Planning Rental	

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CITY OF KINGS MOUNTAIN	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
RUTHERFORD COUNTY	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
TOWN OF FOREST CITY	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
TOWN OF RUTHERFORDTON	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
Town of Spindale	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
POLK COUNTY	Government	Homelessness Non-homeless special needs Ownership Planning Rental	

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Saluda	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
Western NC Housing Partnership	Non-profit organizations	Non-homeless special needs Ownership Rental	
Dogwood Health Trust	Non-profit organizations	Homelessness Non-homeless special needs Ownership Rental	
ISOTHERMAL PLANNING & DEV COMMISSON DBA Foothills Regional Commission	Government	Homelessness Non-homeless special needs Ownership Planning Rental	
Thermal Belt Habitat for Humanity	Non-profit organizations	Homelessness Non-homeless special needs Ownership Rental	
Gateway Wellness Foundation	Non-profit organizations	Ownership Planning Rental	
PARTNERS BEHAVIORAL HEALTH MANAGEMENT	Non-profit organizations	Homelessness Non-homeless special needs Ownership Rental	
Cleveland County Rescue Mission	Non-profit organizations	Homelessness Non-homeless special needs Ownership Rental	

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Rutherford Housing Partnership	Non-profit organizations	Homelessness Non-homeless special needs Ownership Rental	
WNC AIDS Project	Non-profit organizations	Homelessness Non-homeless special needs Ownership Rental	
Gaston-Lincoln-Cleveland Continuum of Care	Non-profit organizations	Homelessness Rental	
Mental Health Association for Cleveland County	Non-profit organizations	Non-homeless special needs Rental	

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

There are many organizations providing services to needed individuals and families in the region, but there is room for more of them. Many of these organizations are specific to certain jurisdictions, and there are gaps in coverage and service across the four-county region. There is room for the creation of new organizations to fill these gaps, and room for the expansion of existing organizations to increase their service capacity. There is a lack of CHDOs in the region. There needs to be more engagement and involvement from the private development community.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			

Street Outreach Services			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X	X	
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X		
Mental Health Counseling	X	X	
Transportation	X		
Other			

Table 51 - 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 service delivery systems in the region provide assistance to the needs of homeless persons, but the service providers face a number of obstacles in providing these services, including funding, staff, and availability of housing units in which to place homeless people, either temporarily or permanently.

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

As above, there are service providers for special needs populations, but they also face a number of obstacles in providing these services, including funding, staff, and availability of housing units.

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 strategy is to first increase the amount of housing units available in the region. Second, to encourage the creation of new CHDOs that fill in the gaps in the coverage system. Third, to provide resources to existing service providers to be able to expand their service scope.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	New Construction of Rental Housing	2023	2027	Affordable Housing		Develop New Housing - Both Rental and for purchase Provide special needs housing Prevent and end homelessness		
2	New Construction for Home Ownership	2023	2027	Affordable Housing		Develop New Housing - Both Rental and for purchase Provide special needs housing Promote Homeownership Prevent and end homelessness		
3	Housing Rehabilitation	2023	2027	Affordable Housing		Preserve and improve existing housing Provide special needs housing Educate Landlords and Tenants Prevent and end homelessness		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Rent Assistance	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs		Provide special needs housing Educate Landlords and Tenants Prevent and end homelessness		
5	Homeownership Assistance	2023	2027	Affordable Housing		Provide special needs housing Promote Homeownership Educate Landlords and Tenants Prevent and end homelessness		
6	Homeless Housing	2023	2027	Homeless		Develop New Housing - Both Rental and for purchase Preserve and improve existing housing Provide special needs housing Prevent and end homelessness		

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	New Construction of Rental Housing
	Goal Description	Construct new rental housing units and developments
2	Goal Name	New Construction for Home Ownership
	Goal Description	Construct new homeownership properties
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide housing rehabilitation services and promote and develop agencies that support and provide rehabilitation services
4	Goal Name	Rent Assistance
	Goal Description	Expand rental assistance programs across region, for low to moderate income individuals and families, as well as homeless and special needs populations
5	Goal Name	Homeownership Assistance
	Goal Description	Support first time homebuyers through down payment and closing-cost assistance
6	Goal Name	Homeless Housing
	Goal Description	provide stable housing options to help both chronically homeless and those with special needs

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)

The following is an estimated breakout of income categories served over the five years of this Strategic Plan:

Extremely Low (0-30% AMI): 100

Low Income (>30%-50% AMI): 150

Moderate Income (>50%-80% AMI) 100

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 Foothills PHA would like to increase the number of accessible units across the four-county region, and works with landlords on how to accomplish this

Activities to Increase Resident Involvements

The Foothills PHA have begun regular tenant/landlord meetings to increase communication and discussion, with the goal of increasing the number of units provided by landlords.

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

No

Plan to remove the 'troubled' designation

N/A

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

Barriers to Affordable Housing

There are a wide range of policies that can affect housing affordability. Restrictive single-family zoning is currently being re-evaluated in several states and communities across the country, as this can limit the housing density increases that are needed to increase housing supply and lower costs. In some areas, a lack of zoning creates its own set of challenges since there are not clearly defined rules, and residents can organize and challenge new developments in an ad-hoc fashion. Limits on manufactured housing and accessory dwelling units (ADUs) also create barriers to affordable housing.

Another important public policy, set at the federal level, is the Fair Market Rent, which is the basis for payment amounts for several HUD rental and housing assistance programs. Stakeholders cited the mismatch between FMR and actual rents as an issue.

In general, market-drivers (i.e., the cost and availability of land, labor and materials; available financing; real estate transaction costs) were more often cited as having a significant impact on affordable housing development.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The primary strategy for the Foothills region is the development of new housing for both rent and homeownership. The HOME Consortium will focus on this strategy first, and work with stakeholders across the region to develop new housing stock.

The secondary strategy of the region is to rehabilitate existing housing that is in need of assistance. This will allow for a greater number of housing units to be available for rent or purchase.

The HOME Consortium will work with its jurisdictional partners regarding zoning matters and how to best allow for the development of new housing within each jurisdiction, and the rehabilitation of existing housing within same.

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

Regional service providers currently work with homeless individuals and families and are aware of their needs, which are not well served by the private market. Through the HOME Consortium, the goal is to provide more resources to these service providers, such as rental assistance. Development of new housing units and rehabilitation of existing units will help provide additional housing options to assist the homeless population.

Addressing the emergency and transitional housing needs of homeless persons

Emergency shelters and transitional housing are not approved HOME funded activities. However, it is the goal of the Foothills HOME Consortium to help provide new assistance to these service providers, so that they may be able to utilize other funds for emergency shelters and transitional 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 goal of providing homeless housing that meets the unique needs of those who are unsheltered and who may have compounding issues and struggles will help people make the transition to permanent housing. Other plan goals like rent assistance, new rental construction and housing rehabilitation will increase access to and supply of affordable housing when people are ready for independent living.

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

The goals of homeownership assistance and rent assistance both help people access and stay in permanent housing. Other plan goals of housing rehabilitation and new construction of rental and homeowner housing preserve and increase the supply of affordable housing so that people have options to use assistance programs.

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 potential for Lead Based Paint presence will be assessed whenever program funds are used to repair or purchase an existing home. If LBP is found, and the repair actions will disturb surfaces, then LBP removal and mitigation techniques will be employed. Families will be informed and educated about the risks associated with LBP.

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

Approximately 41% of owner-occupied houses and 46% of renter-occupied households were built prior to 1980 and have a risk of lead-based paint. While extensive lead-based paint education and testing throughout the 1990s and early 2000s significantly reduced the potential for poisoning, the age of housing is an indicator for ongoing concern. Therefore, the actions above are warranted and necessary with the scope of the anticipated program activity during the next five years.

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

The Consortium Policies and Procedures state:

Lead Based Paint. If the dwelling unit was built prior to 1978, the subrecipient must comply with the rehabilitation requirements of the Lead Safe Housing Rule (24 CFR Part 35, Subpart J). The purpose of the regulation is to identify and address lead-based paint hazards before children are exposed to lead.

The requirements of the Lead Safe Housing Rule depend on the level of assistance provided to the unit. The summary below provides a brief overview of the regulations. For more information, see <http://www.hud.gov/offices/lead/>.

- For units with a level of assistance less than \$5,000, paint testing must be conducted on all painted surfaces to be disturbed or replaced during the renovation, or it must be presumed that all these painted surfaces are coated with lead-based paint. Safe work practices must be employed during the rehabilitation work, and upon completion, a clearance examination of the worksite is required. Clearance of the worksite is required prior to the unit being reoccupied.

- For units with a level of assistance over \$5,000 and up to \$25,000, lead hazards must be identified by a risk assessment (or presumed to be present) and then addressed through interim controls or standard treatments. Proper safe work practices, trained staff, and unit clearance are also required.
- For units with a level of assistance over \$25,000, lead hazards must be identified through a risk assessment (or presumed to be present) and addressed through abatement by a certified abatement contractor. Clearance is required.

The *level of assistance* is defined as the lesser of the *per unit Federal assistance* or the *per unit hard costs of rehabilitation*. When calculating the per unit hard costs of rehabilitation, do not include the lead hazard reduction costs.

All homeowners must receive the lead-based based pamphlet, *Protect Your Family From Lead in Your Home* as well as other relevant information pertaining to the rehabilitation work. The subrecipients must have documented evidence that this notice was provided.

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

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

Education and employment are common tools to address and alleviate poverty. The Foothills Workforce Development Board works with stakeholders and partners across the region to provide the Workforce Development and Education Program funded by WIOA (Workforce Innovation and Opportunity Act). The HOME Consortium will work with the Foothills Workforce Board to connect job seekers with available jobs, in order to help reduce the number of poverty-level families.

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

The HOME Consortium will work with jurisdictions, partners, and stakeholders to align the strategies of this plan with ongoing poverty reducing programs.

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 Consortium will take every measure necessary to ensure long-term compliance with all applicable program requirements. The program administrator will use a combination of progress reports, desk monitoring and site visits to monitor activities carried out in the implementation of the Consolidated Plan. Staff will conduct file reviews to ensure compliance with all applicable requirements including environmental review, labor standards, income verification, and all other applicable requirements. Staff will work with all recipients and subrecipients of HOME funds to ensure they are aware of and in compliance with all program requirements.

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	815,652	0	0	815,652	3,262,608	\$815,652 was the allocation in year 1 and we assume four additional years of similar funding for the con plan
HUD-VASH	public - federal	TBRA	0	0	0	0	0	
LIHTC	public - federal	Multifamily rental new construction	0	0	0	0	0	

Table 53 - 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

HUD HOME funds will be utilized to leverage private investment in development of affordable housing. Local participating jurisdictions will provide the matching requirement for projects within their jurisdiction. Funding will be sought from Dogwood Health Trust and other local funders for specific projects and programs that assist in achieving the goals of this Strategic Plan.

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

N/A

Discussion

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 Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	New Construction of Rental Housing
	Goal Description	
2	Goal Name	New Construction for Home Ownership
	Goal Description	
3	Goal Name	Housing Rehabilitation
	Goal Description	
4	Goal Name	Rent Assistance
	Goal Description	
5	Goal Name	Homeownership Assistance
	Goal Description	

6	Goal Name	Homeless Housing
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following projects have been identified through stakeholder consultation and represent the combination of their proposed ideas and service targets, rather than specific, individual projects since these need to be selected through an application process once the HOME funding has been released and the Consortium board has been established. Locations are not specified for the projects, but would be implemented in all of the 4 consortium counties.

#	Project Name
1	RFP for Affordable Housing Units

Table 55 – Project Information

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

The primary need in the Foothills region is to expand the number of affordable housing units. The primary goals of the Foothills HOME Consortium will be to both create new housing stock, and rehabilitate existing housing stock. These will be the priorities over the first several years of the program.

AP-38 Project Summary
Project Summary Information

1	Project Name	RFP for Affordable Housing Units
	Target Area	
	Goals Supported	New Construction of Rental Housing New Construction for Home Ownership
	Needs Addressed	Develop New Housing - Both Rental and for purchase Promote Homeownership Prevent and end homelessness
	Funding	HOME: \$734,087
	Description	Consortium will issue a request for proposals for construction of affordable housing units
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

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

The need for affordable housing is huge across the entire region, and all assistance projects will be targeted to positively impact the entire region.

Geographic Distribution

Target Area	Percentage of Funds

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

Affordable Housing

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

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	40
Special-Needs	0
Total	40

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	40
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	40

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

Discussion

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

Introduction

The Foothills PHA provides Housing Choice Vouchers (HCV) across the region, and its program participants have had difficulty finding affordable and sufficient housing options to use these vouchers.

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

Rental housing rehab is one of the projects proposed for the upcoming year to increase supply for voucher holders.

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

The HOME Consortium will work with the Foothills PHA in developing new programs in which residents can be more involved. The HOME Consortium may also work with stakeholders to establish new CHDO that would engage with residents.

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

N/A

Discussion

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

Introduction

Homelessness is a problem in rural areas, even if it is harder to see and quantify. Below are some examples of actions and activities that will be undertaken assist people who are unsheltered or at risk of becoming homeless.

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

There are street outreach programs in the Foothills region, but they need to be expanded to encompass the entire region.

Addressing the emergency shelter and transitional housing needs of homeless persons

The HOME Consortium will work with jurisdictions to develop goals and actions for emergency shelters and transitional housing needs in the region.

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 HOME Consortium will work with jurisdictions, the Foothills PHA, and partners to develop goals and actions for assisting homeless persons transition to housing in the region.

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.

The HOME Consortium will work with jurisdictions, the Foothills PHA, and partners to develop goals and actions for assisting individuals and families to avoid them becoming homeless.

Discussion

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

Introduction

The biggest barrier to affordable housing in the Foothills region is the lack of available housing for rent or purchase.

Other factors include market-drivers (i.e., the cost and availability of land, labor and materials; available financing; real estate transaction costs).

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

One strategy will be to work with communities to identify potential zoning and land use policies that may be limiting affordable housing development. Another priority will be identifying proactive policies and strategies that communities can implement to support and encourage affordable housing development.

Discussion

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

Introduction

Actions planned to address obstacles to meeting underserved needs

A big obstacle to meeting underserved needs is insufficient financial and human resources. The region has many dedicated and engaged service providers who need additional support to carry out their missions. The HOME consortium and funding will provide a platform and means for more collaboration to maximize resources and service delivery.

Actions planned to foster and maintain affordable housing

HOME funding will be used to seed new housing projects as well as to acquire and rehabilitate existing affordable housing stock.

Actions planned to reduce lead-based paint hazards

All rehab performed with HOME funds will meet LBP safety standards. The potential for lead-based paint will be assessed whenever program funds are used to repair or purchase an existing home. If LBP is found, and the repair actions will disturb surfaces, then LBP removal and mitigation techniques will be employed. Families will be informed and educated about the risks associated with LBP.

Actions planned to reduce the number of poverty-level families

Increasing the supply of affordable housing, and providing rent and down payment assistance will help reduce housing cost burden, a major factor contributing to poverty in the region.

Actions planned to develop institutional structure

Primary focus will be on establishing the Consortium board and procedures, as well as setting up an application and selection process to distribute HOME funding.

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

The consortium board, meetings, and funded projects will encourage and enhance coordination among all stakeholders.

Discussion

Program Specific Requirements

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

Introduction

The following guidelines will be reviewed and updated once the Consortium board is established.

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:

No other forms of investment are anticipated being used.

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:

The Consortium will adopt recapture provisions. Major proposed elements are:

- The Consortium requires the recapture of its HOME-funded direct homebuyer assistance from net sales proceeds when the original HOME-assisted homebuyer(s) sells or otherwise transfers ownership of the unit during the affordability period, either voluntarily or involuntarily, i.e., foreclosure or short sale. If the assisted homebuyer(s) do not maintain their status as owner occupants, the full HOME investment in the activity, including any direct homebuyer assistance and any development subsidy, are subject to repayment.
- Net sales proceeds are the cash funds remaining from the sale of the property by the original homebuyer less the repayment of the outstanding balance on any superior mortgage(s) and seller's closing cost. The amount of recaptured funds from net proceeds may not exceed the amount of net proceeds available from the sale. When net sales proceeds are equal or exceed the original HOME-funded direct homebuyer assistance (plus any shared appreciation), that assistance will be repaid in full. Any net sales proceeds remaining after the recapture of the direct homebuyer assistance and any shared appreciation will be returned to the original homebuyer(s).
- In the event the homebuyer sells the unit during the affordability period and the net proceeds are not sufficient to recapture the entire HOME-funded direct homebuyer assistance and any shared appreciation, all net sales proceeds will be recaptured.

HOME-funded direct homebuyer assistance will be provided as loans in one of two ways. The HOME loan may extend for as long as the original homebuyer owns the home, including any period of ownership beyond the HOME affordability period. The subrecipient administering a homebuyer program for the Consortium may choose among the following two options on a program by program basis of assistance. The two loan structures include:

- a. A non-amortizing, non-forgivable, 0% interest rate, deferred second mortgage loan.
- b. A non-amortizing, non-forgivable deferred payment loan that will be repaid at the same rate as the appreciation of the value of the house. A home's appreciation will be the difference between the original homebuyer's purchase price and the price at which it is later sold.

- The recapture provision is enforced through execution of a written agreement, which identifies the period of affordability, primary residency requirement, and terms and conditions required when using the recapture provision, 24 CFR Part 92.254(a)(5)(i)(A). A Participating

Jurisdiction must be included as a party, along with the subrecipient to the written agreement associated with the HOME funds provided to eligible homebuyers.

- Recaptured funds may be retained by the CHDO that developed and sold the house to the original buyer and must be used for HOME eligible activities in accordance with the requirements of the HOME statute and regulations. The funds are not considered "CHDO proceeds."

- Recaptured HOME funds provided by a subrecipient, including non-profits that are not CHDOs, will be recaptured by the Consortium or, if so specified in the grant written agreement, retained by the subrecipient to be used for HOME eligible activities in accordance with the requirements of the HOME statute and regulations.

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:

Housing that is acquired for homeownership using HOME funds will comply with the following:

1. *The purchase price may not exceed the HOME Maximum Purchase Price for single-family housing for the area.*

2. *If repairs are necessary, the appraised value of the property (after rehabilitation) may not exceed the HOME Maximum Purchase price.*

3. *The household must have an annual income of 80% or less of the HUD established area median, adjusted for household size.*

4. *The property must be used as the household's principal residence.* 5. *The HOME assistance is limited to the minimum required to make the unit affordable.*

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:

There are no plans to use HOME funds to refinance debt.

Attachments

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, enter appropriate history: <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	* 4. Applicant Identifier: <input type="text"/>	
* 5a. Federal Entry Identifier: <input type="text"/>	* 5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
* 6. Date Received by State: <input type="text"/>	* 7. State Application Identifier: <input type="text"/>	
B. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="McDowell County, North Carolina"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="06-6000310"/>	* c. UEI: <input type="text" value="TCT3WIKZEDJ73"/>	
d. Address:		
* Street1: <input type="text" value="59 E. Court Street"/>	<input type="text"/>	
* Street2: <input type="text"/>	<input type="text"/>	
* City: <input type="text" value="Carrboro"/>	<input type="text"/>	
* County/Parish: <input type="text"/>	<input type="text"/>	
* State: <input type="text" value="NC; North Carolina"/>	<input type="text"/>	
* Province: <input type="text"/>	<input type="text"/>	
* Country: <input type="text" value="USA; UNITED STATES"/>	<input type="text"/>	
* Zip / Postal Code: <input type="text" value="27510"/>	<input type="text"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Ashley"/>	<input type="text"/>
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: <input type="text" value="Wooten"/>	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text"/>	<input type="text"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="828-652-2976"/>	* Fax Number: <input type="text"/>	
* Email: <input type="text" value="awooten@mcdoell.com"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="E: County Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CFDA Title <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value="CFDA 14.259"/>	
* Title: <input type="text" value="Home Investment Partnerships Program"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Home Investment Partnerships Program for Foothills NC HOME Consortium"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	815,532.00
* b. Applicant	263,513.00
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,079,045.00

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes No

If "Yes", provide explanation and attach

21. "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 the 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, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

** The 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:

Print: * First Name:

Middle Name:


* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4010-0008
 Expiration Date: 02/28/2026

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing 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 duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure 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 examine 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 use of, or change the terms of the real property title or other interest in the title and facilities without permission and instructions from the awarding agency. Will record 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-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel 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 Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-362) 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. §§1081-1083, 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 handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-265), 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. 91-618), as amended, 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. §§8901 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Revised Form 424D (Rev. 7-87)
 Prescribed by OMB Circular A-102

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. 91-648) 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.
12. 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-Bacon 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 area 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 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance 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 1965, 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).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to processing components or potential components of the national wild and scenic rivers system.
17. 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. §§489a-1 et seq.).
18. 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."
19. 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 severe 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 subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Manager
APPLICANT ORGANIZATION McDowell County, North Carolina	DATE SUBMITTED 08/16/2021

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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.

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

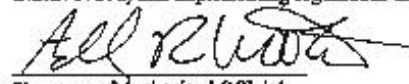
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

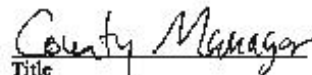
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-113, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The 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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 73.

 8/16/2022
Signature of Authorized Official Date


Title

Specific HOME Certifications

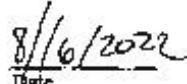
The HOME participating jurisdiction certifies that:

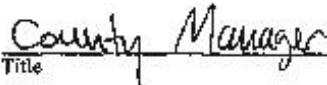
Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

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

Subsidy Layering -- 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.


Signature of Authorized Official


Date


Title

Appendix - Alternate/Local Data Sources

1	Data Source Name 2020 Demographic Data
	List the name of the organization or individual who originated the data set. Bowen National Research
	Provide a brief summary of the data set. The 2020 demographic estimates are provided through multiple sources - ESRI, Urban Decision Group and Bowen National Research.
	What was the purpose for developing this data set? To provide more up-to-date information thnt the default data from 2017.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? It covers all counties and the full range of requested demographics.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2020
	What is the status of the data set (complete, in progress, or planned)? Complete
2	Data Source Name CHAS 2013-2017 Download
	List the name of the organization or individual who originated the data set. HUD
	Provide a brief summary of the data set.
	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?

	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p>
3	<p>Data Source Name PHA Survey</p>
	<p>List the name of the organization or individual who originated the data set. Foothills PHA</p>
	<p>Provide a brief summary of the data set. Summary PHA data</p>
	<p>What was the purpose for developing this data set? To determine how many units and vouchers each PHA administers, as well as what the resident characteristics are.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected. 2022</p>
	<p>Briefly describe the methodology for the data collection. NA - requested specific information from each PHA.</p>
	<p>Describe the total population from which the sample was taken. N/A</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. N/A</p>
4	<p>Data Source Name ACS 2015-2019</p>
	<p>List the name of the organization or individual who originated the data set. US Census</p>
	<p>Provide a brief summary of the data set.</p>
	<p>What was the purpose for developing this data set?</p>

	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p>