

CITY OF GREENVILLE

COMMUNITY
DEVELOPMENT BLOCK
GRANT (CDBG) and
HOME INVESTMENT
PARTNERSHIP (HOME)
ANNUAL ACTION PLAN
[Housing Division]

2010

P.O. Box 7207, GREENVILLE, NORTH CAROLINA 27835

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I. EXECUTIVE SUMMARY

A. Purpose

The Action Plan is a requirement of the Department of Housing and Urban Development (HUD) as a condition of receiving funding under certain federal programs. The goal of the Plan is to extend and strengthen partnerships among the public and private sector to provide decent housing, establish and maintain a suitable living environment and expand economic opportunities.

This plan serves as the City's application for federal funding for the following federal entitlement programs:

- Community Development Block grant (CDBG)
- HOME Investment Partnership Program

B. Background

The 2010-2011 Annual Action Plan represents the third year of the City of Greenville Consolidated Plan. The current Consolidated Plan was approved on May 8, 2008, by the City Council. The plan identifies a comprehensive strategy to address community needs for the five-year period 2008-2013. The plan associates goals and objectives with current needs throughout the five-year period. The goals and objectives identified guide staff in selecting activities to be carried out during each fiscal year. The top priorities and goals determined in the Consolidated Plan include the following:

1. Revitalization of several neighborhoods in West Greenville that are in a state of decline through:
 - Rehabilitation of owner occupied units.
 - Acquisition and demolition of dilapidated rental housing.
 - Acquisition of vacant parcels to assemble land for suitable building sites
 - Construction of affordable housing in West Greenville Revitalization area.
 - Establishing a neighborhood commercial focus area.
 - Preserving historical business district along Albemarle Avenue and West Fifth Street.
 - Conversion of rental dwellings to owner occupants with downpayment assistance.
 - Identification of infrastructure improvements.
 - Improving but preserving the neighborhood character.
 - Developing programs and services with the private sector that will aid in the success of revitalization efforts.
 - Landscaping/Streetscape improvements.

2. Supporting nonprofits that provide housing assistance to special needs populations, provide youth services, and encourage entrepreneurship.
3. Providing homebuyer assistance for first-time homebuyers.
4. Continue to eliminate lead-based paint hazards in dwellings assisted with federal funding.

C. Geographic Area

The City of Greenville, North Carolina is located in the coastal plains area of the State, in Pitt County. It is geographically located 84 miles east of Raleigh, 157 miles south of Richmond, VA, and 265 miles south of Washington, DC. Greenville is the tenth largest city in North Carolina (pop. 81,932). From 1990 to 2000, the population increased by more than one-third, growing by 34.3 percent from 44,972 in 1990 to 60,385 in 2000. Over the past 20 years the community has experienced dramatic growth. Greenville is slowly emerging as a major industrial and economic center for Eastern North Carolina – a center for education, industry, medicine and culture.

D. Geographic Allocation of Investment

Program activities carried out by the City of Greenville will occur throughout the City, but some specifically within the West Greenville 45-Block Revitalization Area (**Appendix C**). This area can be defined as bounded on the north by West Fifth Street, on the west by Bancroft Street, on the east by Albemarle Avenue and to the south by Fleming Street. The area involved has been a target area for City of Greenville housing programs for many years. Recent efforts have substantially reduced the area currently being targeted in an attempt to address greater needs in a more concentrated approach. Please see attached maps of census tracts that are areas of minority concentration and low income block groups (**Appendix C**).

Some program data indicates that minority populations comprise a majority of the targeted income groups. However, eligible persons from all racial, ethnic and gender groups are given the opportunity to participate in any of the housing programs.

E. Strategies to Meeting the Underserved Need

The City of Greenville has established the following strategies for meeting the needs of the underserved in the community.

1. Housing Strategies

a. Downpayment Assistance

The City of Greenville continually seeks methods for fostering and maintaining affordable housing. Funds during the 2010-2011 Program Year have been reserved for downpayment assistance to low-moderate income homebuyers within the City of Greenville. Funds will be used to address goals for increasing homeownership throughout the City. Funding from previous years has also been made available to homebuyers as downpayment assistance. Provision of downpayment assistance decreases the amount of financing and/or funding a homebuyer needs in order to purchase a home. To date, we have assisted 47 families with funding from the North Carolina Housing Finance Agency totaling \$733,889 and 49 families under the HOME Program for a total assistance of \$536,745. The City also provides assistance with local bond funds to aide with downpayment or closing costs. Bond funds are awarded to qualifying applicants as a no interest loan up to 5% of the purchase price of the home and amortized over 5 years. 29 families have received assistance totaling \$53,209.

b. Development of Affordable Housing

In an attempt to address the barriers to developing affordable housing, the City of Greenville continues to create single family affordable housing opportunities. The lots are purchased by the City with funding from approved public bonds. Upon acquisition and installation of infrastructure, the City then makes lots available to nonprofit agencies for development. All submitted proposals are accepted based on a reasonable price per square foot and the nonprofit's ability to meet building specifications as required by the Request for Proposal. Purchase of the land and improvements increases the affordability of the lots in turn reducing the cost to the homebuyer. As lots are sold to eligible homebuyers, the funds for the lot cost are recaptured and used to fund future developments.

c. Partnerships

The City of Greenville partners with local nonprofit agencies to provide Homeownership Counseling & Workshops for potential homebuyers. The City additionally also offers a Homeownership Academy that provides participants with the opportunity to gain a working knowledge of the home buying process and to prepare financially to purchase a home within the West Greenville 45 Block Revitalization Area. At the completion of the program, participants receive a certificate for \$500.00 redeemable at closing to assist with the purchase of an existing or new home within the West Greenville 45 Block Revitalization Area.

d. Support of Habitat for Humanity

The City of Greenville also supports the Pitt County Habitat for Humanity as another housing resource. Funding from our CDBG Subrecipient Program is made available for housing providers such as Habitat to acquire lots.

2. Community Development Strategies

a. Revitalization

The intended actions in the West Greenville Area Revitalization Redevelopment Plan are to build upon the strengths of the area and remove obstacles that limit the possibilities for success. The goals of the plan in this area are to increase the levels of homeownership, remove blighting influences, improve the public infrastructure, create continuous and ongoing programs with service providers to address the social issues of the community and to provide quality economic development and commercial opportunities for the area and for its residents.

b. Multifamily Development

Two new housing developments were completed in 2010 in Greenville's Center City. Nathaniel Village, an affordable family oriented multi-family development made possible through a joint venture between the Redevelopment Commission and Landmark Development, a housing developer headquartered in Winston-Salem, North Carolina. Once completed, Nathaniel Village will offer 48 units and 104 bedrooms of high quality apartment living to residents wishing to live in proximity to Greenville's historic Uptown Commercial District.

Three blocks to the north along the scenic banks of the Tar River, First Street Place student living got underway which will offer 228 bedrooms in 193 units of upscale apartment living to a clientele expected to be largely comprised of upper division students attending East Carolina University. Together, these two projects represent the first significant housing development in Greenville's Center City in more than two decades.

c. Infrastructure Improvements

Planning and design work continued in 2010 on three major public infrastructure projects that collectively will help to reshape the functionality and image of Greenville's Center City. Two streetscape projects, the West Fifth Street Gateway and the Cotanche and Reade project will respectively improve aesthetics, vehicular and pedestrian safety, and will provide Greenville's citizens with a first of its kind opportunity – municipally sponsored public art.

3. Economic Development Strategies

a. Façade & Site Improvement Grant Program

Maintaining the architectural quality and aesthetic appeal of commercial and office structures in the West Greenville Redevelopment Area is an important part of the overall strategy to restore the economic vitality of West Greenville. Proper improvements to the exterior of individual buildings will help to develop an image that will invite additional investment into the area.

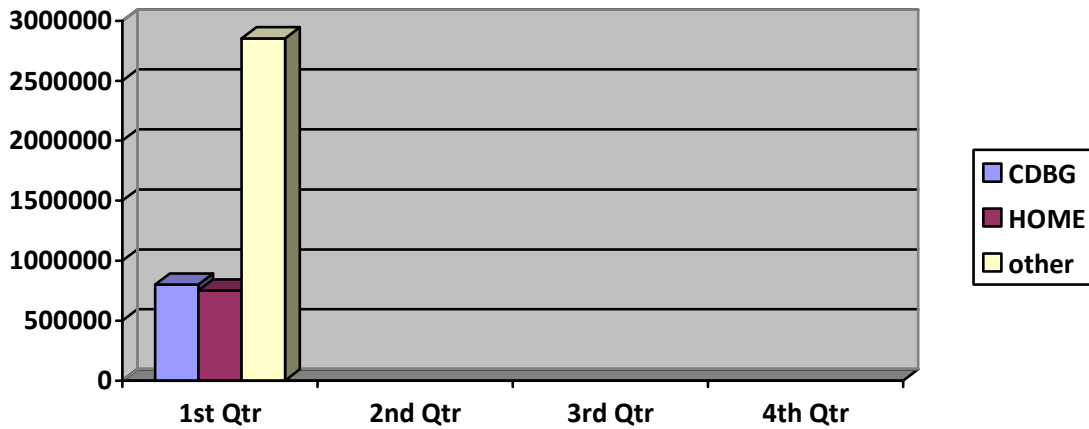
The Greenville Redevelopment Commission has developed the Building Blocks Façade and Site Improvement Grant Program in order to provide an incentive to property and business owners to make improvements to their properties. These guidelines should be followed by property owners, tenants, architects and contractors involved in exterior improvements or rehabilitation to buildings in the West Greenville Redevelopment Area.

b. Small Business Incubator

The Redevelopment Commission of Greenville has contracted with the Small Business and Technology Development Center (SBTDC), a state agency, to study the feasibility of establishing a small business incubator within the geographic bounds of the West Greenville Redevelopment Area. The incubator mission will be to create an open, business-first small business incubator that will cultivate entrepreneurship, and promote economic development and community revitalization within the West Greenville Redevelopment Area. It is anticipated that CDBG funds will be used to supplement the project.

II. SOURCES OF FUNDS

Resources available to support activities identified in the Consolidated Plan and this Annual Action Plan will include Community Development Block Grant funds, HOME Investment partnership, Lead Based Paint Hazard Control Program, general revenues, local Bond program, North Carolina Housing Finance Agency, private lending institutions and private developers.



A. CDBG Program

The Housing and Community Development Act of 1974 created the Community Development Block Grant program in 1974. Since 1975, the City of Greenville has participated in the program with a variety of activities. The City of Greenville became an Entitlement in 1994. As an Entitlement, the City receives an annual allocation of funding from the U.S. Department of Housing and Urban Development. The primary objective of CDBG is the development of viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities. All activities carried out must meet one of the three National Objectives. Those objectives are:

- Benefit low-moderate income persons;
- Aid in the prevention or elimination of slums or blight; or
- Addressing an “urgent need”

B. HOME Investment Partnership Program

The HOME Investment Partnership program was created by the National Affordable Housing Act of 1990 to create local partnerships for providing decent affordable housing to lower income households. It is intended that local jurisdictions work with nonprofit organizations and the private investment community to achieve this goal.

Cities receiving HOME funds must reserve 15% of their HOME funds to Community Housing Development Organizations (CHDOs) for affordable housing development.

In 1997, the Pitt County HOME Consortium was formed. The Consortium included the City of Greenville as lead entity, the Towns of Farmville, Ayden, Bethel, Grifton and Pitt County. The Town of Winterville became a member in 2001. As a Consortium, the communities were eligible for further financial assistance from the U.S. Department of Housing and Urban Development. The Pitt County Consortium has provided affordable housing and improvements for over ten years.

However, as of January 2008, the City Council of Greenville voted to disband the Consortium partnership and apply to become a “Participating Jurisdiction” for HOME funding. This Action Plan will represent Greenville’s second year as a Participating Jurisdiction for HOME for City of Greenville only.

Local match requirement for the 2010-2011 Home Program is approximately \$144,702. These funds come from local funds earmarked for Affordable Housing and for meeting match requirements. The funds will be used to augment HOME projects. The HOME Consortium currently has a match credit of \$1,199,682, which will be carried over. Despite the match credit, the City still identify match with all projects, evidence of which is detailed on the match log.

C. American Recovery and Reinvestment Act (ARRA)

The City of Greenville was awarded through the 2009 Federal Stimulus Plan, American Recovery and Reinvestment Act (ARRA) from the U.S. Department of Housing and Urban Development a Lead Based Paint Hazard Control Grant. The proposed \$1.9 million grant funds will be used to accomplish the following within 36 months, which began April 15, 2009:

- Control and reduce lead hazards in one hundred and ten (110) low-income housing units in the Greenville area.
- Addressing 110 housing units occupied by children under the age of six w/ elevated blood lead levels
- Provide 75 outreach programs for community awareness and education regarding lead hazards aimed at reaching 5,000 people
- Screening and test for elevated lead levels in children under age six

- Provide Lead Safe Work and Lead Certification training to at least 10 Contractors involved in the City of Greenville housing rehabilitation program
- Provide economic opportunities to at least sixty (60) unemployed and underemployed persons in the targeted neighborhoods, creating 60 jobs
- Develop a self sustaining program by integrating lead hazard reduction into housing rehabilitation programs

In addition, as an entitlement community for CDBG program, the City has been awarded \$216,580 of CDBG-Recovery funds to enhance community development activities.

D. Affordable Housing Bond Program

On November 2, 1992, the citizens of Greenville approved a one million dollar bond referendum for affordable housing. The funding was divided into three revolving loan categories. The categories include homeownership, land banking, and elderly housing rehabilitation. As revolving loans, these funds are continually recaptured and recycled into the activities to further efforts to promote and preserve affordable housing. This bond lead to the production of 161 affordable homes for first time low and moderate income buyers and flood survivors and over 153 loans to low and moderate families for home purchases and rehabilitation of low income elderly homeowner residences. These funds have been recycled since 1992 and are available for the 45 Block Revitalization program and other affordable housing initiatives of the City of Greenville.

In 2004, citizens again approved \$10 million in bond referendums for the revitalization efforts in the Uptown and West Greenville 45 Block Revitalization focus area. Five million of the \$10 million is set aside for the priorities and goals identified below within the 45 Block Revitalization Area for the use with CDBG and HOME funds.

E. Funding Summary Chart

Source	Amount	Description
CDBG	\$887,849	Funds will be used for administration, housing rehabilitation, acquisition, relocation, public service, public facility improvements and clearance/ demolition.
HOME Investment Partnership	575,192	Funds will be used for administrative cost, housing rehabilitation, new construction, downpayment assistance, and CHDOs.
General Revenue	\$340,000	Funds to leverage administrative/operating costs for staff and other local municipal appropriations to support programs.
Affordable Housing Bond Program	\$150,000	A 1992 Voters Referendum for preservation and creation of affordable housing in the City of Greenville.
North Carolina Housing Finance Agency	\$200,000	Funds are awarded from the New Home Loan Pool in the West Greenville 45 Block Revitalization Area for downpayment assistance.
ARRA-Lead Based Paint Hazard Control Grant	\$1,922,370	Funds from Office of Healthy Homes and Lead Hazards to provide education, contractor certification, testing and abatement and reduction of lead hazards for children under six and their families.
Program Income	\$16,000	Funds generated from recaptured activities of CDBG and HOME assisted units.
Total All Sources	\$4,091,411	Approximate total of all sources

III. CITIZEN PARTICIPATION

The City of Greenville continues to acknowledge the importance of citizen participation in developing activities for each upcoming year. Revisions to the Citizen Participation Plan were placed into effect as of September 11, 2003 (see **Appendix F**) in an effort to increase public awareness. Despite the recent changes to the current plan, we will continue to search for avenues to increase the level of participation by the community. Resources to better our current plan will include HUD recommendations; contact with other cities to review their plans, and most importantly the consideration of input from the local community to increase involvement.

The City also encouraged public participation in developing the 2010-2011 Annual Action Plan by making a copy of the plan available to the Affordable Housing Loan Committee members; and a copy accessible at all City Community Recreational Centers, Library and Housing Division Office for the general public, nonprofits and other interested parties to review and submit comments from March 22, 2010 through April 23, 2010. No comments have been received.

In addition, two Public Hearings were held for citizens to provide input on February 11, 2010 and April 8, 2010 during City Council meetings.

IV. ONE YEAR ACTION PLAN

A. Introduction

The 2010-2011 Annual Action Plan describes the CDBG and HOME activities proposed for the 2010 fiscal year. The Five-Year Consolidated Plan guides development of the plan and selection of activities to be undertaken. The plan also includes the resources available to perform the activities, a detailed description of the activities, and maps depicting the areas in which the activities will take place.

The activities to be undertaken by the City of Greenville for the 2010-2011 fiscal year will include Program Administration, Owner-Occupied Housing Rehabilitation, Downpayment Assistance to First-time Homebuyers, Housing Rehabilitation, New Construction Clearance & Demolition, Public Service, Community Housing Development Organizations, Relocation Assistance, and Land Acquisition. It is anticipated that a majority of the proposed activities will be completed within the program year with a few overlapping into future years.

In addition to routine Community Development activities through the CDBG and HOME Programs, we continue to expand the supply of new single family affordable housing units with the assistance of local bond funds. These new units require the experience and oversight of the City of Greenville Housing Division.

The City of Greenville has constructed a total of 162 units throughout the City. See the breakdown below:

New Single Family Units	Total Units
Singletree	24
Carolina Heights	15
Red Oak	1
Countryside Estates	105
West Greenville	17
Total	162

B. Performance Measurement

The focus on demonstrating performance and results is present at all levels of government and in the private sector. Performance measurement is a program tool that can help housing and community development practitioners collect data, track progress, and report on program results in a way that speaks to the impact a program has had on a community and the lives of its residents. Performance Measurement is an organized process for gathering information to determine how well programs and activities are meeting established needs and goals. There are three main components to Outcome Performance Measurement System: Objectives; Outcomes; and Indicators.

1. Objectives:

Performance Measurement offers three possible objectives for each activity. These objectives are based on the broad statutory purposes of the four Community Planning and Development programs:

a. Creating Suitable Living Environments

This objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. The activities are intended to address a wide range of issues faced by low and moderate income persons, from physical problems with their environment, such as poor quality infrastructure, to social issues such as crime prevention, literacy, or elderly health services.

b. Providing Decent Housing

This objective focuses on housing activities whose purpose is to meet individual family or community housing needs.

c. Creating Economic Opportunities

This applies to activities related to economic development, commercial revitalization or job creation.

2. Outcomes:

The second component of the system is outcomes, which are closely related to objectives. The program outcome helps further refine the objectives and is designed to capture the nature of the change or the expected result of the objective to achieve. The following are the three identified:

a. Availability/Accessibility

This applies to activities that make services, infrastructure, public services, public facilities, housing or shelter available or accessible to low and moderate income people, including persons with disabilities.

b. Affordability

These are activities that provide affordability in a variety of ways to low and moderate income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups or services such as transportation or day care.

c. Sustainability

This applies to activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low and moderate income by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

3. Indicators:

Once the program purpose (objective) has been established and intended result (outcome), the next step is to identify how to measure progress towards achieving the intended results. There are four common indicators that are relevant for most activities:

- Amount of money leveraged from other sources
- Number of persons, households, businesses, units or beds assisted
- Income level of persons or households by: 30%, 50%, 60% or 80%
- Race, ethnicity and disability data

A successful performance measurement system is tailored to the specific goals and objectives of the program. To meet its obligation to assess program performance, HUD must require grantees to provide information on their achievements and investments since program objectives and activities are determined and implemented locally.

C. 2010-2011 Action Plan Projects:

1. Program Administration

Activity 2010-1

Regulatory Citations: 24 CFR Parts 92.207, and 570.206

Description: Staff salary, planning, and administrative service delivery costs for implementing the Community Development Block Grant and HOME Programs, will be funded through CDBG and HOME awards, as well as local general revenue support.

Funding Amount:	\$57,500	HOME
	\$177,500	CDBG
	\$310,000	General Fund

2. Housing Rehabilitation

Activity 2010-2

Regulatory Citations: 24 CFR Parts 92.205-(a) (1), 570.202

Description: This program is designed to assist very low to low income homeowners with rehabilitating existing housing structures. The primary intent of this activity is to bring units up to code through the provision of rehabilitation activities to eliminate all code violations and provide a decent, safe and sanitary living environment. Program costs incurred may include demolition, construction, permitting fees, surveying, lead abatement, credit reports and closing costs. This activity will target owner occupied homeowners only. Qualified candidates for assistance include homeowners with annual incomes below 80% of the median area income as defined by HUD.

Funding Amount:	\$ 400,000	CDBG
	\$ 150,000	HOME

Performance Measurement

Objective: Providing Decent Housing

Outcome: Affordability

Output Indicators: Number of units rehabilitated Goal: 10

3. New Construction

Activity 2010-3

Regulatory Citations: 24 CFR Parts 92.205-(a) (1)

Description: This program is designed to assist very low to low income first time homeowners with purchase of a home. The primary intent of this activity is to increase homeownership opportunities that maximize HOME and Bond resources by providing funding to build new single family units in West Greenville. This activity will create partnerships as necessary to assist low income households in purchasing new single family units in West Greenville. Qualified candidates for assistance include households with annual incomes below 80% of the median area income as defined by HUD.

Funding Amount: \$ 150,000 HOME
\$ 150,000 Bond funds

Performance Measurement

Objective: Providing Decent Housing
Outcome: Affordability
Output Indicators: Number of units **Goal:** 3

4. Acquisition of Substandard/Dilapidated Properties

Activity 2010-4

Regulatory Citations: 24 CFR Part 570.201 (a), 570.201 (d), 570.201 (i)

Description: Efforts will continue to acquire and demolish substandard and dilapidated properties that continue to blight the 45-Block Revitalization Area. Acquisition will focus on vacant rental properties or vacant parcels however it may be necessary to acquire occupied rental units for the betterment of the community. Relocation assistance will be provided to tenants that are displaced per URA guidelines. Parcels will be recombined for the development of new, affordable housing units. Acquisition costs may include, but not limited to legal fees, appraisal costs and surveying.

Funding Amount: \$70,000 CDBG

Performance Measurement of Acquisition Activities

Objective: Creating Suitable Living Environments
Providing Decent Housing
Outcome: Affordability, Availability/Accessibility
Output Indicators: Number of units acquired **Goal:** 2
Number of households relocated to decent housing

5. Relocation/Displacement Assistance

Activity 2010-5

Regulatory Citations: 24 CFR Part 570.201 (a), 570.201 (d), 570.201 (i)

Description: As part of the West Greenville 45 Block Revitalization plan, efforts will continue to acquire and demolish substandard and dilapidated properties that continue to blight the area. Acquisition will focus on vacant rental properties or vacant parcels however it may be necessary to acquire occupied rental units for the betterment of the community. Relocation assistance will be provided to tenants that are displaced per Uniform Relocation Assistance guidelines.

Funding Amount: \$10,000 CDBG

Performance Measurement of Relocation/Displacement Assistance

Objective: Creating Suitable Living Environments
Providing Decent Housing
Outcome: Affordability, Availability/Accessibility
Output Indicators: Number of units households **Goal:** 5

6. Public Service

Activity 2010-6

Regulatory Citations: 24 CFR Part 570.201(e)

Description: The City of Greenville will make available funds to assist nonprofit organizations with approved public services activities. Qualified agencies will participate in projects that benefit citizens of the City of Greenville. Nonprofit housing and service providers must assist the underserved populations of the City. Applications from nonprofits are submitted to the City for consideration annually and reviewed by the Affordable Housing Loan Committee. The activities will assist low income persons, homeless and special needs persons, youth development, victims of family/domestic violence, and housing providers. All funding will be expended from September 2010 through August 2011.

Funding Amount: \$115,000 CDBG

Performance Measurement of Public Service Activities

Objective: Creating Suitable Living Environment
Outcome: Sustainability
Output Indicators: Number of LMI households served **Goal:** 25

Agency Name	Award Amount
Boys & Girls Club of Pitt County, Inc.	\$11,000
NC Rural Fund for Development	\$5,800
L.I.F.E. of NC	\$20,000
Building Hope Community Life Center, Inc.	\$15,000
Center for Family Violence Prevention, Inc.(Family Center)	\$22,200
EXCEED	\$5000
Center For Family Violence Prevention, Inc. (Safe House)	\$6,000
10 Year Plan to End Chronic Homelessness	\$30,000
Total	\$115,000

7. Downpayment Assistance

Activity 2010-7

Regulatory Citations: 24 CFR Part 92.205-(a) (1)

Description: This program is designed to assist low income residents with “gap financing” in the form of downpayment and closing cost assistance in the purchase of newly constructed homes and existing homes. All first time participants must contribute at least \$1000 towards the purchase.

Funding Amount: \$100,000 HOME

Performance Measurement

Objective: Providing Decent Housing

Outcome: Affordability

Output Indicators: Number of inquiries **Goal:** 20
Number of first time homebuyers 5

8. Clearance/Demolition

Activities 2010-8

Regulatory Citation 24 CFR Part 570.201(d)

Description: This activity is designed to acquire and demolish substandard structures in the West Greenville 45 block Revitalization area in an effort to improve the living conditions for low income residents. Parcels may be recombined for the development of new, affordable housing units.

Funding Amount: \$45,349 CDBG

Performance Measurement of Clearance/Demolition Activities

Objective: Creating Suitable Living Environment
Outcome: Affordability, Availability/Accessibility
Output Indicators: Number of units acquired **Goal:** 10
Number of units demolished 8

9. Community Housing Development Organization (CHDO) Activities

Activities 2010-9

Regulatory Citations: 24 CFR Part 902.207 (a), (c), (d)

Description: It is anticipated that a certified CHDO will utilize the funding to continue production of single family units for first-time, low-moderate income homebuyers. At the present time, the City has three certified organizations: Metropolitan Housing and CDC, Streets to Home and Exceed, Inc.

Funding Amount: \$117,692 HOME

Performance Measurement

Objective: Decent Affordable Housing
Outcome: Affordability
Output Indicators: Number of new single family units **Goal:** 3

10. Public Facilities Improvement

Activities 2010-10

Regulatory Citations: 24 CFR Part 507.201(c)

Description: It is anticipated that the funds will be used to assist public facilities with minor repairs to improve facilities that serve low to moderate income citizens.

Funding Amount: \$65,000 CDBG

Performance Measurement

Objective: Creating Suitable Living Environment

Outcome: Sustainability

Output Indicators: Number of units **Goal:** 3

Agency	Award Amount
Operation Sunshine, Inc.	\$11,795
Center for Family Violence Prevention, Inc. (Safe House)	\$2800
L.I.F.E. of NC	\$20,345
Building Hope Community Life Center, Inc.	\$26,700
Total	65,000

D. CDBG/HOME Funding Chart

ACTIVITY	HOME FUNDS	CDBG FUNDS	OTHER/BOND FUNDS
Administration	57,500	177,500	310,000
Housing Rehabilitation	150,000	400,000	\$300,000
Relocation	0	10,000	0
Acquisition	0	70,000	0
New Construction	150,000	0	150,000
Downpayment Assistance	100,000	0	30,000
Clearance/Demolition	0	50,349	0
Community Housing Development Organizations	117,692	0	0
Public Facilities Improvement	0	65,000	0
Public Service	0	115,000	0
Program Income	11,000	5,000	0
Total	586,192	892,849	\$790,000

V. OTHER ACTIONS

A. Affirmatively Furthering Fair Housing

The City continues to fund affirmatively fair housing marketing actions. These actions are inherent to each of the housing activities provided through the Community Development Department. Education of the Fair Housing Laws will occur throughout the year and most specifically during the month of April, which is designated as “Fair Housing Month” and “CDBG Week”. As part of a weeklong celebration of CDBG Week, the City sponsored a “Homeownership Fair” on March 27, 2010, Ribbon-cutting for new home, Public Education Forum, Tour for Elected Officials, Housing Partners Reception and “Clean up West Greenville”.

In addition, the City, Greenville Human Relations Council and Area Property Managers Association hosted a Fair Housing Seminar April 21, 2010, which included discussions on the feasibility of establishing a local fair housing ordinance, increased foreclosures, tenant fees and how property managers may better serve tenants.

The City of Greenville will continue to use administrative dollars to fund further fair housing activities during 2010-2011. The City employs a staff person to coordinate all fair housing and other human relations activities, which is funded with general fund dollars in the approximate amount of \$150,000.

B. Analysis of Impediments to Fair Housing Choice

An update to the Analysis of Impediments to Fair Housing Choice was completed by the City of Greenville, May 2008. This section presents the Fair Housing Analysis Update for the 2008-2013 Consolidated Plan. It primarily includes existing impediments to fair housing choice currently being addressed and the plans recommended to remedy them. The update relies on public/private information regarding the real estate and banking industries, Greenville housing and community development activities, North Carolina and Greenville Human Relations Agencies, and the Greensboro and Atlanta HUD Offices of Fair Housing and Equal Opportunity.

1. Impediment

Lack of affordable housing forces the lower income population to find alternative housing. Alternative housing may consist of doubling up; where households combine to cut the expenses of housing. Others are forced to live in housing that is in poor condition that leads to that leads to disparate treatment of protected class families and individuals.

Plan

The financing industry may have the best strategy for this impediment. While it appears to be true that there are insufficient affordable housing units available for housing choice in Greenville, the fact is that a surplus of moderately priced housing is available. Therefore, if lower income home seekers attempt to follow financing recommendations such as using the City's down payment assistance programs and efforts such as West Greenville revitalization that have been instrumental in bringing clients representing "all realms" of the population to apply for loans to purchase homes. The City's down payment assistance is available to everyone. While some applicants appear to be well educated in the homebuyer loan process, the lending industry feels that most still are not. When lenders counsel prospective borrowers about the financial responsibility associated with home mortgages, offering practical advice regarding savings and spending, borrowers become frustrated and seek mortgage loans elsewhere. If all mainstream lenders have similar policies, it is possible that this serves drive people to seek loans through brokers and subprime lenders. Therefore, a stronger push to promote homebuyer counseling appears to be an appropriate solution.

2. Impediment

The lack of education about discrimination and fair housing laws in Greenville. An essential part of fair housing opportunities and enforcement is the education of the public regarding the rights and responsibilities afforded by fair housing laws. This includes the education of housing and financial providers, as well as citizens.

Plan

Education is a key element on two fronts. First, it is one of the most pressing needs to ensure fair housing choice. It is imperative that individuals and families seeking housing know their rights and responsibilities and that those involved in the housing industry understand their rights and responsibilities, as well. Secondly, providing public education that produces an employable workforce with higher earning potential will help improve creditworthiness of future homebuyers. The onus falls to the public school system to ensure that tomorrow's residents have the skills they need to be competitive in the job marketplace, as well as to be educated consumers armed with the skills to make informed decisions.

3. Impediment

Awareness of fair housing issues is important. Everyone needs to know what may constitute a violation, and what they can do in the event they believe they may have been discriminated against. In addition, it is important for lenders, housing providers and their agents to know their responsibilities and when they may be violating fair housing laws.

Plan

In responding to whether Fair Housing was an issue in Greenville, the financing industry again addressed the results of the recent NCRC report, stating that the minority stigma has improved, but it still exists. The lenders need for production (or writing of loans) drives greater leniency in which lenders select to lend to, thereby lessening the impact of race. Mortgage brokers, on the other hand, know that people do business with people who look like them, and so they hire people that resemble the markets they serve. This is good marketing, but also encourages minority homebuyers to seek loans with lenders who are not necessarily looking out for the borrowers' best interests. Additionally, brokers are most familiar with the products that are most popular in the markets they serve and are not aware of all the products offered by the institutions they represent, thus limiting their offerings to higher-cost products. Unfortunately, uninformed buyers also choose lenders on the basis of word-of-mouth referrals from friends and family, and the belief that banks do not lend money to minorities. Again, while educating consumers is indicated, it is difficult to reach them when they will not avail themselves of the opportunities.

The City will continue its efforts to educate the public through Fair Housing month activities and a local loan counseling program.

The City will encourage lenders, housing providers and their agents to know their responsibilities and to attend training on fair housing laws.

4. Impediment

The lack of a pro-active property maintenance code enforcement program. Substandard housing and low property maintenance contribute to the lack of safe, decent, and sanitary affordable housing. Such a program could help with the preservation of the rental housing stock.

Plan

The City will consider several activities to increase the availability of affordable housing opportunities and programs to preserve existing rental housing stock throughout the City including a program to assist investors in rehabilitating substandard housing stock in an effort to keep those units affordable once renovations have been completed.

5. **Impediment**

There are limited housing opportunities for the homeless, those who are at risk of homelessness, and special needs populations. There is not enough funding for permanent housing. Too many citizens are on the brink of becoming homeless because they have to spend too much of their income on housing (many times not decent or safe housing).

Plan

The City will continue to support programs to increase family self-sufficiency and to prepare homeless, at risk and special needs populations for rental or homeownership opportunities through financial literacy, credit counseling and rental assistance. The City also needs to support a number of initiatives to assist low-moderate homebuyers with down-payment assistance, default delinquency counseling, anti-predatory lending counseling and homeless prevention programs.

6 **Impediment**

Lack of Access to Homeownership (Based on HMDA and apparent Predatory Lending Practices)

This Impediment can be addressed in the 2008-2013 Consolidated Plan as the City considers inequities that may occur in homeownership opportunities for protected classes or those covered by the Fair Housing Law.

An analysis of the HMDA data in this document reveals, for example, that while black residents comprise 34 percent of the population, 21 percent of all home purchase mortgage applications come from black families/individuals so therefore, it appears that black applicants may be underrepresented although improving substantially over the past five years. City programs targeted to assist low-moderate income protected classes should focus more closely on educating the population on the importance of homeownership and how to access local lending resources.

In addition, consistently high denial rates on home improvement loans may reflect policies in the lending industry, but this is an area that warrants some attention in Greenville. The disinvestment associated with an inability to raise funds to maintain one's home can have an undesirable effect on the community when it occurs in great numbers.

Plan

In responding to whether Fair Housing was an issue in Greenville, the financing industry again addressed the results of the recent NCRC report, stating that the minority stigma has improved, but it still exists. The need for production (that is, writing loan business) in the lending industry drives greater leniency in which lenders select to lend to, thereby lessening the impact of race. Mortgage brokers, on the other hand, know that people do business with people who look like them, and so they hire people that

resemble the markets they serve. This is good marketing, but also encourages minority homebuyers to seek loans with lenders who are not necessarily looking out for the borrowers' best interests. Additionally, brokers are most familiar with the products that are most popular in the markets they serve and are not aware of all the products offered by the institutions they represent, thus limiting their offerings to higher-cost products. Unfortunately, uninformed buyers also choose lenders on the basis of word-of-mouth referrals from friends and family, and the belief that banks do not lend money to minorities. Again, the solution lies in educating consumers, although it is difficult to reach them when they will not avail themselves of the opportunities.

C. Affirmative Marketing Policy

In accordance with the regulations of the HOME Program and in furtherance of the City of Greenville's commitment to fair housing and equal housing opportunity, this Policy establishes procedures to affirmatively market rental or residential units constructed or rehabilitated under the HOME Program. These procedures are designed to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged are provided an opportunity to apply.

This Affirmative Marketing Policy is documented and maintained in the Housing Division files, and shall be included in all HOME project proposals and agreements and HOME project files. The Beneficiary is held to the terms of the Policy by the requirement in the applicable HOME Subrecipient or HOME/Community Housing Development Organization ("CHDO") Agreement.

It is the policy of the City of Greenville, Housing Division not to discriminate against any person on the basis of race, color, national origin, sex, religion, familial status, or disability:

1. In the sale or rental of housing or residential lots;
2. In advertising the sale or rental of housing;
3. In the finance of housing;
4. In the provision of real estate brokerage services; or
5. In the appraisal of housing.

Please see **Appendix H**.

D. Minority/Women Business Outreach

It is the policy of the City of Greenville to provide minorities and women equal opportunity for participating in all aspects of the City's contracting and procurement programs, including, but not limited to, construction, projects, supplies and materials purchases and professional and personal service contracts.

E. Evaluation and Reduction of Lead-Based Paint Hazards

Lead poisoning is one of the worst environmental threats to children in the United States. While anyone exposed to high concentrations of lead can become poisoned, the effects are most pronounced among young children.

All children are at higher risk to suffer lead poisoning than adults, but children under age six are more vulnerable because their nervous systems are still developing. At high levels, lead poisoning can cause convulsions, coma, and even death. Such severe cases of lead poisoning are now extremely rare, but do still occur. At lower levels, observed adverse health effects from lead poisoning in young children include reduced intelligence, reading and learning disabilities impaired hearing and slowed growth.

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have focused a concerted effort to reach this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR Part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

In property rehabilitation projects involving the City of Greenville, the City will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992, Title X of the Housing and Community Development Act of 1992 (Title 24, Part 35 of the Code of Federal Regulations).

Through the City of Greenville U.S. Department of Housing and Urban Development's Lead Based Paint Hazard Control Grant program, the City proposes to use \$1.9 million grant funds to accomplish the following:

- Control and reduce lead hazards in one hundred (110) low-income housing units in the Greenville area.
- Addressing 110 housing units occupied by children under the age of six w/ elevated blood lead levels

- Provide 75 outreach programs for community awareness and education regarding lead hazards aimed at reaching 5,000 people
- Screening and test for elevated lead levels in children under age six
- Provide Lead Safe Work and Lead Certification training to at least 10 Contractors involved in the City of Greenville housing rehabilitation program
- Provide economic opportunities to at least sixty (60) unemployed and underemployed persons in the targeted neighborhoods, creating 60 jobs
- Develop a self sustaining program by integrating lead hazard reduction into housing rehabilitation programs

The City of Greenville is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs implemented. Currently, the City of Greenville has contracted with an agency to provide all lead testing and clearance activities. This agency has also agreed to provide training for the housing rehabilitation contractors.

In addition, the City of Greenville will offer lead testing and abatement assistance in the form of a grant to eligible housing rehabilitation assistance participants that have children six years and under in the household, senior adults (55+) and the disabled/handicapped clients.

F. Anti-Poverty Strategy

City of Greenville housing programs inherently address poverty by creating housing opportunities for low income households. Without these housing opportunities many low income households would not be able to afford housing rehabilitation costs or to purchase a home.

Additionally, funding through CDBG Public Service activities of transitional housing providers such as the Greenville Community Shelter and Family Violence Program, both nonprofit agencies, allows individuals that would normally reside in impoverished conditions the opportunity to establish themselves in order to find suitable employment. Such efforts will work to reduce the number of persons currently living in poverty.

G. Developing Institutional Structures

The City of Greenville, through its Housing Division, the network of housing subrecipients and Community Housing Development Organizations (CHDOs), are effectively organized to utilize all the funding received through the various state/federal programs.

The private sector is provided with incentives for developing affordable rental housing through tax credits provided by the federal tax credit program. Tax

credits provide developers with an additional state subsidy for low income apartment construction.

In addition, each year efforts are made to work with local institutions to provide housing and economic opportunities for low income persons through public service activities and participation in the Pitt County Continuum of Care. The Pitt County Continuum of Care began in 2001 and has successfully grown into a well-balanced organization made up of local government agencies, housing providers, service providers, and other interested group. The development of the continuum and participation by the City of Greenville will greatly enhance coordination between these agencies. The Public Housing Authority has also joined the Continuum of Care and has begun working in concert with the City of Greenville and our revitalization efforts in the West Greenville 45-Block Revitalization Area.

The City of Greenville will continue to coordinate with other governmental agencies, nonprofit organizations, private enterprises and individuals to provide increased opportunities for the target area.

H. Public Housing

There are four Public Housing managing agencies in the Pitt County area, which include Greenville Housing Authority with a total of 779 units; Mid East Commission who manages a total of 135 units in three towns; Farmville Housing Authority who manages 174 units and Ayden Housing Authority who manages 175 units. Each of the mentioned Public Housing Authorities receives federal funds to modernize and repair public housing units.

In addition, the City of Greenville Community Development Department Housing Division has formed a partnership with the Greenville Housing Authority to offer bimonthly Homeownership and Financial Literacy classes to public housing residents and other citizens. So far, three former resident utilizing the Housing Choice Voucher program and City of Greenville HOME downpayment assistance program has purchased a new home, developed by a local Community Housing Development Organization.

I. Recapture Provisions

HOME program funds are provided to low income individuals for new construction, housing rehabilitation and homebuyer purchase assistance. These funds are provided in a variety of forms and will be extended to persons with incomes up to but not greater than 80% of the Area Median Income adjusted by family size as published by the U.S. Department of Housing and Urban Development. Assistance provided for homebuyer assistance will be in the form of secondary mortgages. Listed below are the recapture provisions for rehabilitation and homebuyer assistance programs with maximum amounts of assistance available for the activity. A Deed of Trust and Promissory Note for the

amount of assistance provided under the program will be used to secure the assistance. Should the recipient default under program requirements, collection of the funds will be pursued with legal guidance as documented on the deed of trust and promissory note as recorded. Assistance may be in the form of deferred loans or amortized loans.

- Homebuyer assistance may be used for downpayment assistance and/or principal mortgage reduction via Secondary Mortgage. Borrower's income cannot exceed 80% of the area median income adjusted by family size as published annually for Greenville. Maximum loan amounts of up to \$20,000 (20% of sales price of home with cap of \$20,000). Loans will be amortized over a fifteen-year period.
- Housing Rehabilitation Assistance will be offered to persons/families with incomes up to but not greater than 80% of the area median income adjusted by family size and as published annually for Greenville. For households with incomes less than 50% of the area median income, a 10 year deferred loan will be offered up to \$60,000 for rehabilitation assistance. For households with incomes from 51% to 80% of the median area income, the combination of a deferred payment loan and a no interest loan is available. Deferred loans are forgiven at a rate of 10% each year and no-interest loans are amortized over 10 years. In no case may the assistance exceed \$60,000 unless special circumstances exist that warrant exceeding the maximum price and approval of the City Manager is granted.
- Assistance provided to nonprofit agencies through the CDBG Program will be secured with a subrecipient agreement/contract. Should the agency fail to comply with program rules, the assistance will be recaptured.
- Assistance provided for new construction to certify CHDOs will be secured by a program agreement/contract. Should the agency fail to comply with program rules, the assistance will be recaptured.

VI. MONITORING PLAN

In regard to CDBG and HOME programs, the City of Greenville's Housing Division Staff has the responsibility for monitoring all activities undertaken.

All activities are covered by an established set of standards in the City of Greenville's Policy and Procedures Manual for the Community Development Programs. In addition all activities are carried out under a binding agreement/contract. Activities are reviewed for compliance with program objectives. The Housing Division maintains records of all activities.

Monitoring activities include but are not limited to the following:

- Monthly meetings with Affordable Housing Loan Committee.
- Weekly contact with Non-Profit Agencies funded under CDBG and HOME as projects occurs for compliance with Local/National Program Objectives.
- Monitor projects of subrecipient agencies to insure compliance with Davis-Bacon, Bidding, Contracting, Uniform Act, Auditing and Local Building Code requirements.
- Monitor progress of all projects through bimonthly reporting to City Management and local elected officials.
- Financial activities in the programs are reviewed on a monthly basis.
- Annual inspection of assisted properties for continued maintenance of property and verification Hazard Insurance by Community Development Staff.
- Annual independent audit of all expenditures is conducted and results are provided to City Council, Granting Agencies, and Bonding Agencies.
- Review of nonprofit files for maintaining information required by the City of Greenville and granting agencies (as outlined in procedures manual and contract).
- Conduct Workshops for contractors, non-profits, and other program participants to review guidelines and requirements.

A. HOME Program Monitoring Schedule

The following is the proposed monitoring schedule for the HOME Investment Partnership Program:

Monitoring Schedule - HOME Investment Partnership

Active Funded Consortium Members	Contact Person	Monitoring Visit Close out of Prior Year Funding	Quarterly Monitoring Visits	Quarterly Monitoring Visits	Quarterly Monitoring Visits
Town of Farmville	Richard Hicks	Week of July 12, 2010	Week of September 27, 2010	Week of January 3, 2011	Week of March 14, 2011
Pitt County	Lori Jones	Week of July 12, 2010	Week of September 27, 2010	Week of January 3, 2011	Week of March 14, 2011

Active Funded CHDO's	Contact Person	Monitoring Visit Close out of Prior Year Funding	Quarterly Monitoring Visit	Quarterly Monitoring Visit	Quarterly Monitoring Visit
Farmville Housing Development Corporation	Dean Corbett	Week of July 12, 2010	Week of September 27, 2010	Week of January 3, 2011	Week of March 14, 2011
Metropolitan Housing & CDC	Rev. David Moore	Week of July 12, 2009	Week of September 27, 2010	Week of January 3, 2011	Week of March 14, 2011

Quarterly Review Outstanding Projects

Consortium Members with Outstanding Projects	Contact Person	1st Quarter Monitoring Visit	2nd Quarter Monitoring Visit	3rd Quarter Monitoring Visit	4th Quarter Monitoring Visit
Town of Grifton	Joe Albright	Week of July 6, 2010	Week of October 4, 2010	Week of January 4, 2011	Week of April 4, 2011

Annual Compliance Review

Annual Compliance Review (Affordability Period)	Contact Person	Annual Monitoring Visit
Town of Ayden	Cindy Dunn	Week of June 20, 2011
Town of Bethel	Todd Bullock	Week of June 20, 2011
Town of Winterville	Tangi Williams	Week of June 20, 2011

B. CDBG Program monitoring Schedule

The following is the proposed monitoring schedule for the CDBG Program:

Monitoring Schedule - CDBG

Active Subrecipient	Contact Person	Monitoring Visit Date
Family Violence Program	Diane Lucas	January 3, 2011
L.I.F.E. of NC, Inc.	Joyce Jones	January 3, 2011
Greenville Housing Development Corporation	Michael Best	January 3, 2011
Greenville Community Shelter	Lynne James	January 3, 2011

VII. STRATEGIES TO ELIMINATE HOMELESSNESS

A. Continuum of Care

Since 2001, the City of Greenville has actively assisted with the creation and development of a Continuum of Care for Pitt County. The group, known as the Pitt County Continuum of Care, is devised of City and County staff, as well as non-profit and for-profit representatives. The group meets monthly to discuss the ever-growing homeless population in our community. Efforts to end homelessness and to coordinate supportive services to homeless persons are top priorities for the community. The January 2010, a Continuum of Care Homeless Population Point in Time Survey revealed that there are 93 homeless persons in Pitt County. Currently, Pitt County has 100 emergency beds and 28 transitional housing units available to serve them.

During the upcoming 2010-2011 fiscal year, the group will continue to develop the Continuum and prepare a grant application for submission. To date, the Pitt County Continuum of Care has received funding every year since 2003 funding cycle. Funding received under the 2004 and 2005 award was allocated to implement a Homeless Management Information System (HMIS). All actions by the Continuum of Care group will address obstacles to meet the underserved needs in the community, assist with the reduction of poverty level families, assist with the development of “institutional structures”, and enhance coordination between public and private housing and social service providers. Other actions will include marketing of the continuum to reach out to surrounding communities in an endeavor to promote regional participation.

B. Ten-Year Plan to End Homelessness

The City of Greenville, Pitt County Government, United Way and other nonprofit agencies formed a partnership in 2008 to hire a professional consultant to assist the community with developing a Ten-Year Plan to End Chronic Homelessness in Pitt County. The Plan was approved October 2008 by the Greenville City Council and Pitt County Commission. The goals and objectives are as follow:

GOAL 1

Provide community-based services and support to prevent homelessness before it happens and diminish risks for homelessness to recur.

■ Outcome 1-A

Increased access to services provided to the homeless population.

■ Outcome 1-B

Increased number of individuals who are employed and able to manage their personal finances.

■ Outcome 1-C

A comprehensive client-centered discharge planning process coordinated among community agencies for individuals leaving foster care, mental health facilities, jails and prisons, medical facilities, and military units who are at risk for homelessness.

■ Outcome 1-D

A data infrastructure (HMIS) that would link all services, screen for program eligibility, and gather data needed to monitor (assess) progress of implementation.

GOAL 2

Create adequate short-term housing options and supportive permanent housing for those who are chronically homeless or at risk of becoming homeless.

■ Outcome 1-A:

Increased inventory of housing options that meet the needs of individuals and families who are homeless and those at risk of becoming homeless.

Both local governments and nonprofit agencies are now in the process of planning for implementation. The City Council approved in September 2008 a two year contribution of CDBG funds in the amount of \$30,000 per year to fund implementation activities. During fiscal year 2009, CDBG program will fund SOAR Training, which strives to access disability benefits for homeless people and those at risk of homelessness who are living with disabilities; and a "Project Connect" event.

A

Application for Federal Assistance SF-424		Version 02
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		*2. Type of Application * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision *Other (Specify) _____
3. Date Received:	4. Applicant Identifier: M-10-DC-37-0211	
5a. Federal Entity Identifier:		*5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
*a. Legal Name: City of Greenville		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 56-6000229		*c. Organizational DUNS: 072013451
d. Address:		
*Street 1:	200 West Fifth Street	
Street 2:	_____	
*City:	Greenville	
County:	Pitt	
*State:	North Carolina	
Province:	_____	
*Country:	USA	
*Zip / Postal Code	27835	
e. Organizational Unit:		
Department Name: Community Development		Division Name: Housing
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	Ms.	*First Name: Sandra
Middle Name:	w.	
*Last Name:	Anderson	
Suffix:	_____	
Title:	Senior Planner/Housing Administrator	
Organizational Affiliation: City of Greenville		
*Telephone Number: 252-329-4061		Fax Number: 252-329-4631
*Email: swanderson@greenvillenc.gov		

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

C. City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

HOME Investment Partnership _____

***12 Funding Opportunity Number:**

*Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Areas within the corporate limit of Greenville, NC.

***15. Descriptive Title of Applicant's Project:**

2010-2011 Annual Action Plan

Application for Federal Assistance SF-424 Version 02

16. Congressional Districts Of:
 *a. Applicant: 3rd *b. Program/Project: 3rd

17. Proposed Project:
 *a. Start Date: 07-01-2010 *b. End Date:

18. Estimated Funding (\$):

*a. Federal	575,192
*b. Applicant	_____
*c. State	_____
*d. Local	_____
*e. Other	_____
*f. Program Income	11,000
*g. TOTAL	586,192

***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.)**

Yes No

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 218, 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:

Prefix: Dr. *First Name: Patricia

Middle Name: C.

*Last Name: Dunn

Suffix: _____

*Title: Mayor

*Telephone Number: 252-329-4419 Fax Number: 252-329-4435

* Email: pdunn@greenvillenc.gov

*Signature of Authorized Representative  *Date Signed: 04-23-2010

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

Not applicable

Application for Federal Assistance SF-424

Version 02

*1. Type of Submission:

- Preapplication
 Application
 Changed/Corrected Application

*2. Type of Application

- New
 Continuation
 Revision

* If Revision, select appropriate letter(s)

*Other (Specify)

3. Date Received:

4. Applicant Identifier:

B-10-MC-37-0020

5a. Federal Entity Identifier:

*5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: City of Greenville

*b. Employer/Taxpayer Identification Number (EIN/TIN):
56-6000229

*c. Organizational DUNS:
072013451

d. Address:

*Street 1: 200 West Fifth Street

Street 2: _____

*City: Greenville

County: Pitt

*State: North Carolina

Province: _____

*Country: USA

*Zip / Postal Code 27834

e. Organizational Unit:

Department Name:
Community Development

Division Name:
Housing

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms. *First Name: Sandra

Middle Name: W.

*Last Name: Anderson

Suffix: _____

Title: Senior Planner/Housing Administrator

Organizational Affiliation:
City of Greenville

*Telephone Number: 252-329-4061

Fax Number: 252-329-4631

*Email: swanderson@greenvillenc.gov

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

C. City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

CDBG _____

***12 Funding Opportunity Number:**

N/A _____

*Title:

13. Competition Identification Number:

N/A _____

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Corporate City limits of Greenville, North Carolina

***15. Descriptive Title of Applicant's Project:**

2010-2011 Annual Action Plan for CDBG funds.

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

*a. Applicant: First Congressional

*b. Program/Project: First Congressional

17. Proposed Project:

*a. Start Date: 07/01/10

*b. End Date: 07/01/2011

18. Estimated Funding (\$):

*a. Federal	_____	887,849
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	887,849

*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.)

- Yes No

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 218, 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:

Prefix: Dr. *First Name: Patricia

Middle Name: C.

*Last Name: Dunn

Suffix: _____

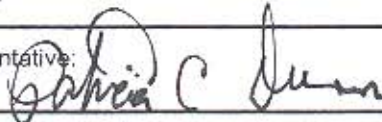
*Title: Mayor

*Telephone Number: 252/329-4419

Fax Number: 252/329-4435

* Email: pdunn@greenvillenc.gov

*Signature of Authorized Representative:



*Date Signed: April 23, 2010

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

N/A



CPMP Non-State Grantee Certifications

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

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

NON-STATE GOVERNMENT CERTIFICATIONS

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

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

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

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

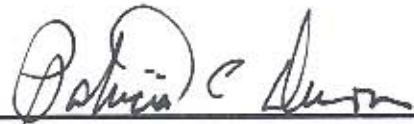
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

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

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

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

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



Signature/Authorized Official

4/23/2010

Date

Patricia C. Dunn

Name

MAYOR

Title

200 West Fifth Street

Address

GREENVILLE NC 27834

City/State/Zip

(252) 329-4419

Telephone Number

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

Specific CDBG Certifications

The Entitlement Community certifies that:

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

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

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

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

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2008, 2009, 2010, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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



04/23/2010

Signature/Authorized Official

Date

Patricia C. Dunn

Name

MAYOR

Title

200 West Fifth Street

Address

GREENVILLE, NC 27834

City/State/Zip

(252) 329-4419

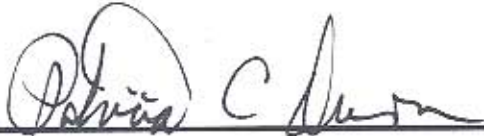
Telephone Number

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

**OPTIONAL CERTIFICATION
CDBG**

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

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



04/23/2010

Signature/Authorized Official

Date

Patricia C. Dunn

Name

MAYOR

Title

200 West Fifth Street

Address

GREENVILLE, NC 27834

City/State/Zip

(252) 329-4419

Telephone Number

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

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 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.

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



04/23/2010

Signature/Authorized Official

Date

Patricia C. Dunn

Name

MAYOR

Title

200 West Fifth Street

Address

GREENVILLE, NC 27834

City/State/Zip

(252) 329-4419

Telephone Number

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

HOPWA Certifications

The HOPWA grantee certifies that:

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

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

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



Signature/Authorized Official

04/23/2010

Date

Patricia C. Dunn

Name

Mayor

Title

P.O. Box 7207

Address

Greenville, NC 27834

City/State/Zip

252-329-4419

Telephone Number

- | |
|--|
| <input checked="" type="checkbox"/> This certification does not apply.
<input type="checkbox"/> This certification is applicable. |
|--|

ESG Certifications

I, _____, Chief Executive Officer of **Error! Not a valid link.**, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

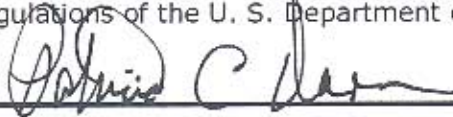
I further certify that the local government will comply with:

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

authorities as specified in 24 CFR Part 58.

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

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



04/23/2010

Signature/Authorized Official

Date

Patricia C. Dunn

Name

Mayor

Title

P.O. Box 7207

Address

Greenville, NC

City/State/Zip

252-329-4419

Telephone Number

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

APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

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

Drug-Free Workplace Certification

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

Place Name	Street	City	County	State	Zip
CITY OF GREENVILLE	200 West Fifth Street	GREENVILLE	PITT	NC	27834

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal

criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- All "direct charge" employees;
- all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- a. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

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

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan



Signature/Authorized Official

04/23/2010

Date

Patricia C. Dunn

Name

MAYOR

Title

200 West Fifth Street

Address

GREENVILLE, NC 27834

City/State/Zip

(252) 329-4419

Telephone Number

B

Proposed Uses of Federal & Local Funds in FY 2010

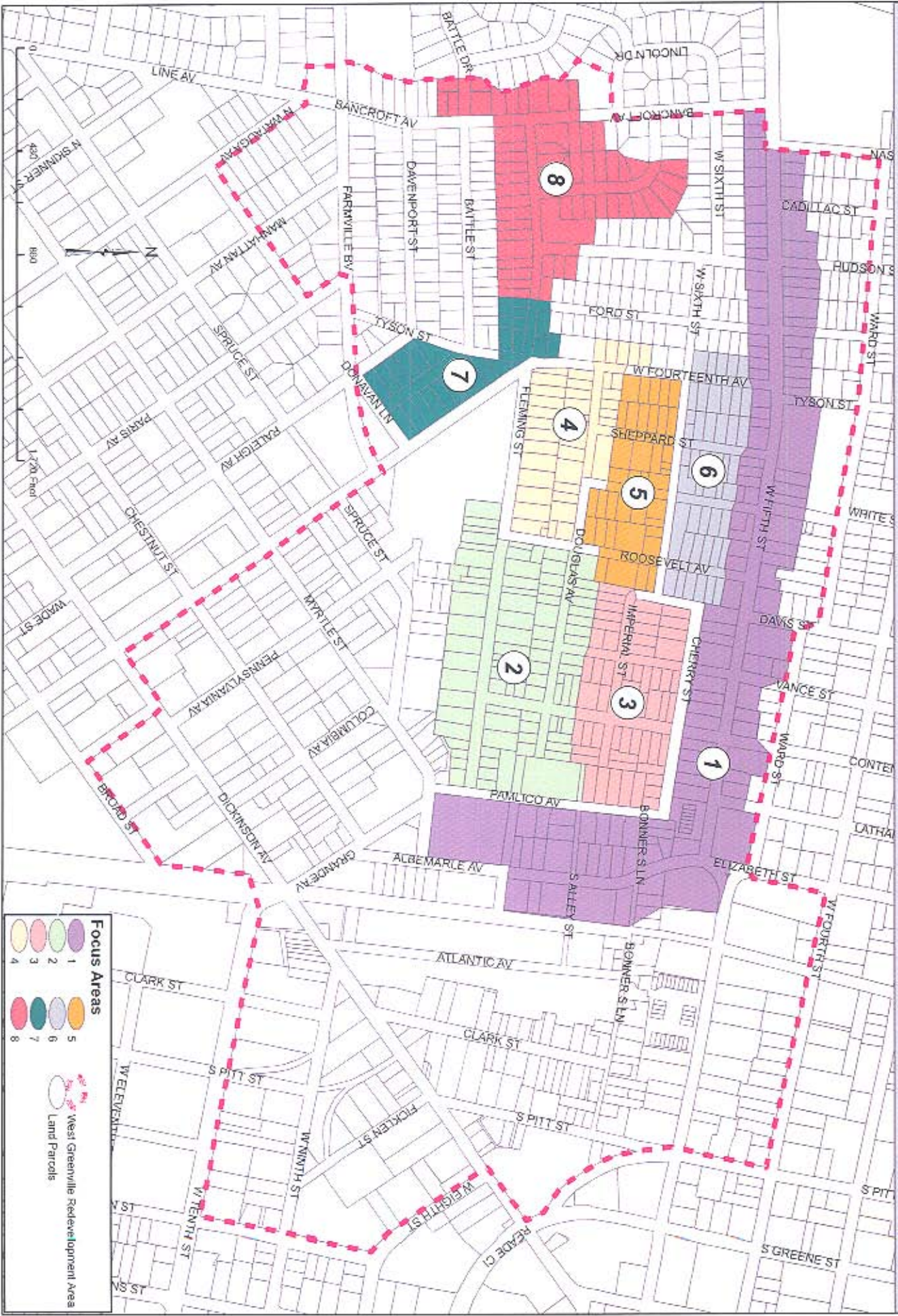
(Leveraging Of Funds)

Program / Activity	CDBG Funds	HOME Funds	Other Federal	Housing Bonds	Local Funds	Total	Proposed Units
HOUSING							
AFFORDABLE HOUSING							
Downpayment Assistance	\$0	\$100,000	\$0	\$0	\$30,000		8
Housing Rehabilitation	\$400,000	\$150,000			\$0		10
New Construction	\$0	\$150,000	\$0	\$150,000	\$0		4
Sub-Total	\$400,000	\$400,000	\$0	\$150,000	\$30,000	\$980,000	22
ADMINISTRATION							
City of Greenville	\$177,500	\$57,500	\$0	\$0	\$310,000		8
Sub-Total	\$177,500	\$57,500	\$0	\$0	\$310,000	\$545,000	8
CHDO							
		\$117,692	\$0	\$0	\$0		1
Sub-Total	\$0	\$117,692	\$0	\$0	\$0	\$117,692	1
PUBLIC SERVICE							
Housing Counseling	\$10,800	\$0	\$0	\$0	\$0		35
Job Training	\$30,000	\$0	\$0	\$0	\$0		15 jobs
Counseling & Outreach	\$28,200	\$0	\$0	\$0	\$0		15
Homeless-10 year Plan	\$30,000	\$0	\$0	\$0	\$0		1 job
Youth Development	\$11,000	\$0	\$0	\$0	\$0		
	\$5,000	\$0	\$0	\$0	\$0		
Sub-Total	\$115,000	\$0	\$0	\$0	\$0	\$115,000	50
REVITALIZATION							
Acquisition	\$70,000	\$0	\$0	\$0	\$0		4
Clearance/Demolition	\$50,349	\$0	\$0	\$0	\$0		4
Relocation	\$10,000	\$0	\$0	\$0	\$0		4
Public Facility Improvements	\$65,000	\$0	\$0	\$0	\$0		5
Sub-Total	\$195,349	\$0	\$0	\$0	\$0	\$195,349	17
Total	\$887,849	\$575,192	\$0	\$150,000	\$340,000	\$1,953,041	98
ECONOMIC DEVELOPMENT							
Infrastructure Improvement		\$0	\$0	\$0	\$0		
Business Incubator		\$0	\$0	\$0	\$0		
Economic Development Total	\$0	\$0	\$0	\$0	\$0	\$0	0
PROGRAM INCOME							
Housing Rehab	\$4,000	\$0	\$0	\$0	\$0		1
Downpayment Assistance	\$0	\$10,000	\$0	\$0	\$0		1
Administration	\$1,000	\$1,000					
Program Income Total	\$5,000	\$11,000	\$0	\$0	\$0	\$16,000	2
PROGRAM DELIVERY							
Program Delivery Total	\$0	\$0	\$0	\$0	\$0	\$0	0
GRAND TOTALS							
GRAND TOTALS	\$892,849	\$586,192	\$0	\$150,000	\$340,000	\$1,969,041	100

C



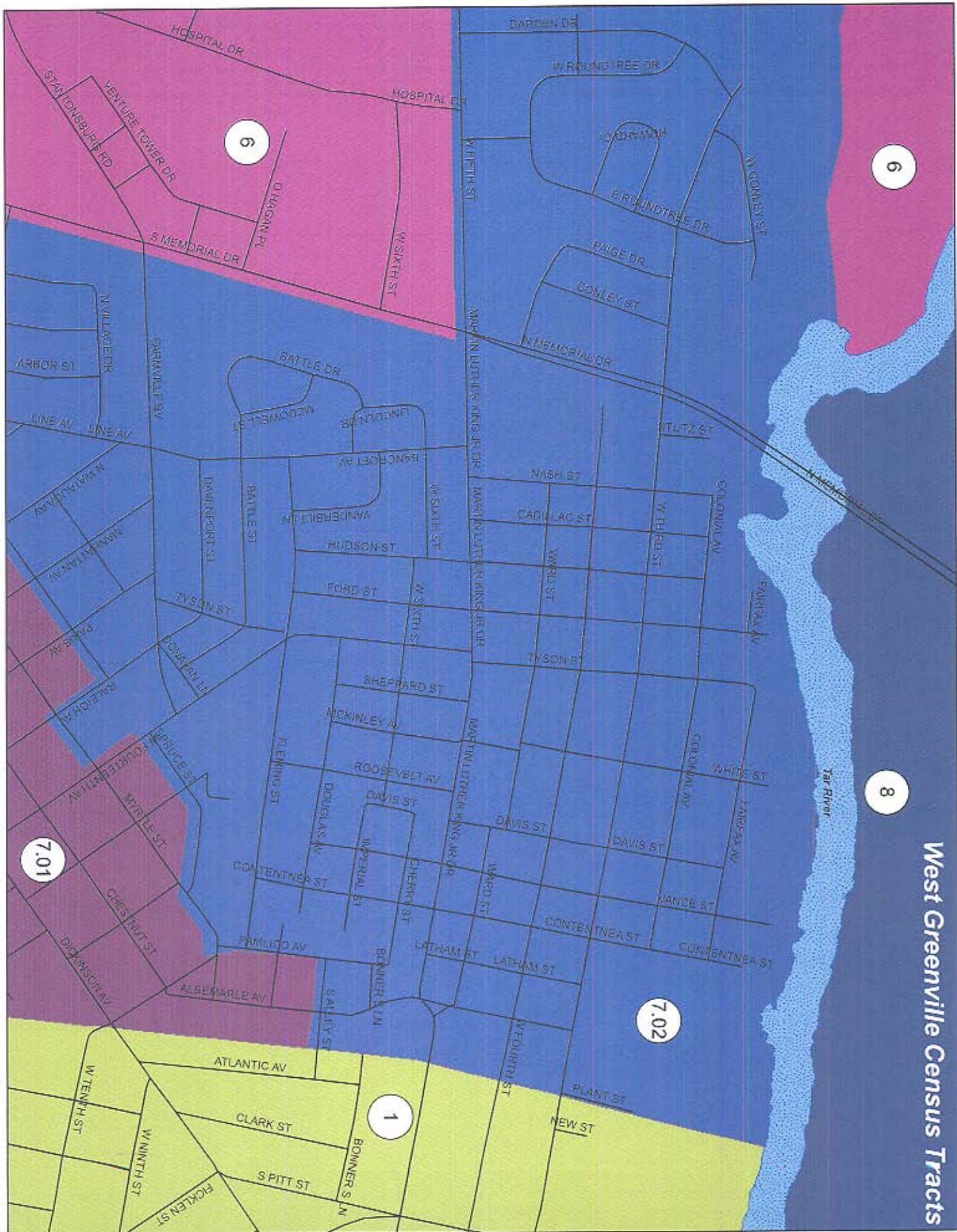
West Greenville Revitalization Areas



Focus Areas

1	2	3	4
5	6	7	8

West Greenville Redevelopment Area
Land Parcels



West Greenville Census Tracts

D

RESOLUTION NO. 10-26
A RESOLUTION ENDORSING THE SUBMISSION OF THE 2010-2011 ANNUAL ACTION PLAN FOR THE CITY OF GREENVILLE, NORTH CAROLINA

WHEREAS, the City of Greenville recognizes the benefits of the Community Development Block Grant and HOME Investment Partnership Programs in providing local governments with the resources to develop viable communities by funding activities that principally benefit low and moderate income persons; and

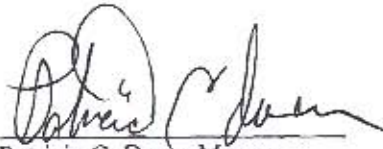
WHEREAS, the City of Greenville recognizes the need to assist low income and special needs populations of the City with Community Development Block Grant and HOME Investment Partnership funds; and

WHEREAS, the Congress and nation acknowledge the critical value of the Community Development Block Grant and HOME Investment Partnership Programs and the significant projects that rely upon its funding;

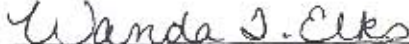
NOW THEREFORE BE IT RESOLVED that the 2010-2011 Community Development Block Grant and HOME Investment Partnership Programs of the City of Greenville be established by:

1. Authorizing the Mayor to execute approval documents required for the submission of the Annual Action Plan for the 2010-2011 fiscal year following the close of the public hearing.
2. Authorizing the City Manager to enter into contracts with Community Housing Development Organizations approved for the 15% CHDO set-aside.
3. Authorizing the City Manager to enter into contracts with Subrecipients approved for HOME and CDBG activities.
4. Authorizing the City Manager or designee to carry out 2010-2011 activities approved in the Annual Action Plan.
5. Authorizing the Director of Community Development or designee to implement such policies and procedures required by the programs, as attached to the Annual Action Plan.

Resolved this the 8th day of April, 2010.


Patricia C. Dunn, Mayor

ATTEST:


Wanda T. Elks, City Clerk

E

PUBLISHER'S AFFIDAVIT

**NORTH CAROLINA
PITT COUNTY**

Bill Hudson affirms that he is ACCOUNTS EXECUTIVE of
The Daily Reflector, a newspaper published daily at Greenville, Pitt County,
North Carolina, and that the advertisement, a copy of which is hereto
attached, entitled

Annual Action Plan Pursuant to the National Affordable Housing Act

was published in said The Daily Reflector on the following dates:

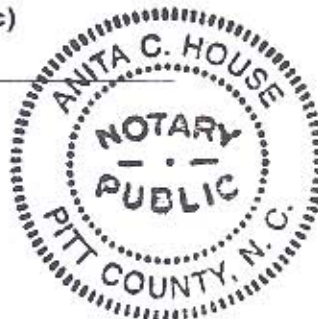
March 22, 2010 and March 29, 2010

**and that the said newspaper in which such notice, paper, document or legal
advertisement was published, was, at the time of each and every publication,
a newspaper meeting all of the requirements and qualifications of Chapter 1,
Section 597 of the General Statutes of North Carolina and was a qualified
newspaper within the meaning of Chapter 1, Section 597 of the General
Statutes of North Carolina.**

Bill Hudson
Affirmed and subscribed before me this 5th day
of April, 2010
Anita C. House

(Notary Public)

My commission expires 11/17/11





Publisher's Affidavit

I, Boger Johnson, Publisher of
Daily News/Carolina Today, a newspaper published in
Greenville, County of Pitt, North Carolina, do hereby
certify that the notice in the action entitled:
Print display ad for 252.00

appeared in Carolina Today for 1 consecutive weeks
beginning 2-11-2010 and ending 2-18-2010.

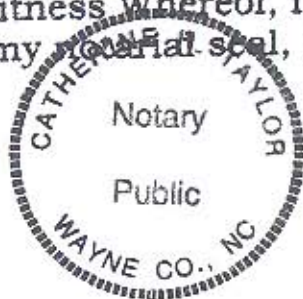
A copy of the notice is attached.
This the ___ day of ___, 2009.

*State of North Carolina
County of Wayne*

Boger Johnson
Publisher

I, Catherine H. Taylor, a Notary Public, in and for the
County and State aforementioned, do hereby certify the
execution of the foregoing instrument for the purpose therein
expressed.

In Witness Whereof, I have hereunto set my hand and
attached my official seal, this the 9 day of April, 2009. *2010*



Catherine H. Taylor
Oct. 16, 2010

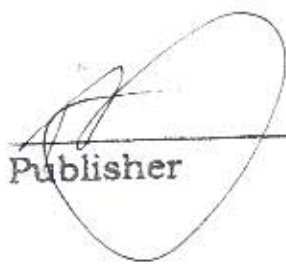


Publisher's Affidavit

I, Roger Johnson, Publisher of
Daily Drum, a newspaper published in
Greenville, County of Pitt, North Carolina, do hereby
certify that the notice in the action entitled:
Print display 28 Feb 2010

appeared in Daily Drum for 1 consecutive weeks
beginning 2-18-10 and ending 2-23-2010.

A copy of the notice is attached.
This the ___ day of ___, 2009.

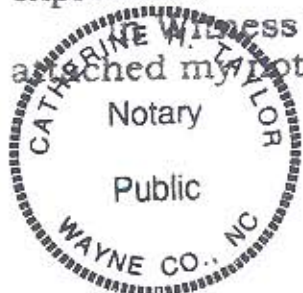


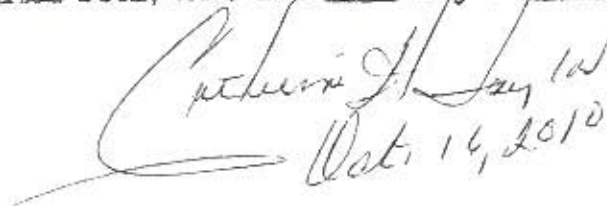
Publisher

*State of North Carolina
County of Wayne*

I, Catherine H. Taylor, a Notary Public, in and for the
County and State aforementioned, do hereby certify the
execution of the foregoing instrument for the purpose therein
expressed.

Witness Whereof, I have hereunto set my hand and
attached my Notarial seal, this the 5 day of April, 2009. 2010




Oct 16, 2010

F

**City of Greenville
Community Development Department
Housing Division
Citizen Participation Plan**

INTRODUCTION:

The U.S. Department of Housing and Urban Development (HUD) provides local governments the opportunity to operate Community Development Block Grant (CDBG) and HOME Programs. In order to participate in these programs, the City of Greenville is required to have a detailed Citizen Participation Plan, which contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of CDBG and HOME (through the HOME Consortium) funding. This plan must be available to the public.

Please note that in February, 2008, the City of Greenville advised the HOME Consortium participants that the Consortium would be disbanded. Due to the current HOME contract between HUD and the City of Greenville, the final year for Consortium funding will be July 1, 2008 through June 30, 2009.

Encouraging Public Participation:

The law requires that our Citizen Participation both provide for and encourage public participation, emphasizing involvement by low and moderate-income persons, especially those located in Targeted Area. Also, the U.S. Department of Housing and Urban Development expects the City of Greenville to take appropriate actions to encourage participation by minorities, non-English speaking person, and person with disabilities. Copies of the Citizen Participation Plan, as well as summaries and basic information pertaining to the CDBG, HOME program, and the Consolidated Planning process are available at the City of Greenville, Community Development Department located at 201 W. First Street, Suite 200, Greenville, North Carolina. This plan supersedes all other plans.

The Role of Low Income People:

The law declares that the primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing: decent housing, suitable living environments and growing economic, all principally for low and moderate-income persons in CDBG and HOME targeted areas. Genuine involvement by low and moderate-income people must take place at all stages of the process, including: identifying needs, setting priorities among these needs, deciding how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs, as well as, overseeing the way in which the programs are carried out.

The Various Stages of the Consolidated Plan Process:

The policies and procedures in this Citizen Participation Plan relate to several stages of action mentioned in law or regulation. In general these stages or events include:

1. Identification of housing and community development needs.
2. Preparation of a draft use of funds for the upcoming year called the proposed Annual Plan. Every 5 years this process will include the preparation of a new proposed Consolidated Plan.
3. Approval of Plan by the Affordable Housing Loan Committee.
4. Formal approval by elected officials of a final Annual Plan or Consolidated Plan.

5. On occasion, it may be necessary to change the use of money already budgeted in an Annual Plan, or to change priorities established in the Consolidated Plan. In that case, a formal Substantial Amendment will be proposed, considered and acted upon. In these instances, major amendments (amendments that involve a change of funding greater than 20% of award), will require a public hearing and approval by the elected governing body prior to submission to HUD. Minor amendments will be approved by City Council however, no public hearing will be held.

PUBLIC ACCESS INFORMATION:

As required by law, the City of Greenville will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan. Regarding the past use of funds, the law requires reasonable public access to records about any uses of these funds during the previous five years. Also, as required by law, the City of Greenville will provide the public with reasonable and timely access to local meetings relating to the proposed or actual use of funds.

Standard Documents

Standard documents include: the proposed and final Action Plans, the proposed and final Consolidated Plan, proposed and final Substantial Amendments to an Annual Action Plan or the Consolidated Plan, Annual Performance Reports, and the Citizen Participation Plan.

Availability of Standard Documents

In the spirit of encouraging public participation, copies of standard documents will be provided to the public at not cost and within two working days of a request. These materials will be available in a form accessible to persons with disabilities, when requested.

Places Where Standard Documents are Available

Standard documents will be available at: City of Greenville Planning and Community Development Department located at 201 W. First Street, Suite 200, town hall administrative offices of the HOME Consortium in Ayden, Bethel, Farmville, Grifton, Pitt County, Winterville, and other public facilities as needed.

PUBLIC HEARINGS:

Public hearings are required by law in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals.

The law requires public hearings at all stages of the process including: an initial public hearing to discuss community needs, proposed uses of funds, and a final public hearing to adopt the Annual Action Plan and or Consolidated Plan.

Access to Public Hearing:

Public hearings will be held only after there has been adequate notice as described in the Public Notice part of this Citizen Participation Plan, including a display advertisement in the Daily Reflector's City Page or the non-legal section of the newspaper. The advertisement will run twice, the first which will run no less than 14 days prior to the public hearing. Public hearings will be held at 7:00 p.m. a time convenient to most people who might benefit from the use of funds.

Public hearings are held in the City Council Chambers located at 201 W First Street, Suite 200, Greenville, North Carolina. The facility is accessible by bus and otherwise convenient and not intimidating to most people who might benefit from the use of funds.

Public Hearings and Populations with Unique Needs.

All public hearings will be held at locations accessible to people with disabilities, and provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. Translators will be provided for people who do not speak English when requests are made at least five working days prior to a hearing. Persons with disabilities needing assistance should call (252) 329-4060 (Teletypewriter (TTY), machine used to transmit and/or receive communications on printed page and/or tape).

The Conduct of Public Hearings.

To ensure that public hearings are meaningful to residents, each public hearing will be conducted during a typical City Council meeting.

Public Hearing and Populations with Unique Needs.

All public hearings will be held at locations accessible to people with disabilities, and provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. Translators will be provided for people who do not speak English when requests are made at least five working days prior to a hearing. Persons with disabilities needing assistance should call (252) 329-4060 (Teletypewriter (TTY), machine used to transmit and /or receive communications on printed page and/or tape).

The Conduct of Public Hearings.

To ensure that public hearings are meaningful to residents, each public hearing will be conducted during a typical City Council meeting.

THE STAGES IN THE PROCESS

A. IDENTIFYING NEEDS

Because the housing and community development needs of low and moderate income people are so great and so diverse, priorities must be set in order to decide which needs should get more attention and more resources than other needs; this is the basic reason the Consolidated Plan exists.

The laws and regulations require a public hearing each year to obtain residents' opinions about needs and what priority those needs have.

Public hearings about needs will be completed before a draft Annual Action Plan is published for comment so that the needs identified can be considered by the City and addressed in the draft Annual Action Plan.

B. THE "PROPOSED" ANNUAL ACTION PLAN and/or CONSOLIDATED PLAN.

The law providing the funds covered by this Citizen Participation Plan calls for improved accountability of jurisdictions to the public. In that spirit and in compliance with the terms of the law, the City of Greenville will use the following procedures:

General Information

At the beginning of this stage the City of Greenville will provide the public with an estimate of the amount of CDBG and HOME funds it expects to receive in the upcoming year, along with a description of the range of types of activities that can be funded with these resources. Also, the public will be given an estimate of the amount of these funds, which will be used in ways that will benefit low and moderate-income people.

The Anti-displacement Plan of the City of Greenville, Resolution Number 1260, was adopted April 11, 1991 to minimize the extent to which low and moderate income persons will have to leave their homes as a result of the use of these federal dollars (called "displacement") will also be available at this time. The anti-displacement plan describes the City of Greenville's policy regarding displacement and the efforts to minimize displacement.

Technical Assistance.

City staff will work with nonprofit organizations representative of low and moderate-income people who are interested in submitting a proposal to obtain funding for Public Service activities and Brick and Mortar projects. Public Services include homeownership counseling and employment training to low-moderate income persons in targeted areas. Notice of funding availability will be mailed directly to known nonprofits and advertised. All potential applicants for funding are encouraged to contact City staff for technical assistance before completing a proposal. Up to 15% of CDBG Entitlement funds will be made available for projects. The regular funding cycle will begin in February of each year. Advertisement of funding availability will begin the process. The Affordable Housing Loan Committee will review and make recommendations on nonprofit proposals to City Council during the regularly scheduled March meeting. Beginning November 1, 2003, proposals received outside of the regular funding cycle will not be considered.

Availability of a Proposed Annual Action Plan.

The City of Greenville will notify the public that a Proposed Annual Action Plan is available so that persons in the affected areas, and others, will have a reasonable opportunity to examine it and to submit comments.

Copies of the Proposed Annual Action Plan will be made available to the public for free and without delay. So that low and moderate income people can determine the degree that they might be affected, the Proposed Annual Action Plan will be complete, containing: all HUD-required sections, the HUD-required Priorities Table; and, a written description of all proposed uses of CDBG and HOME. At a minimum, this description shall include the type of activity, its location, and the amount of Federal money to be allocated to it.

Public Hearing and Further Action.

A public hearing about the Proposed Annual action Plan will be conducted.

In preparing a Final Annual Action Plan, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Final Annual Action Plan will have a section that presents all comments, plus explanations why any comments were not accepted.

C. THE "FINAL" ANNUAL PLAN and/or CONSOLIDATED PLAN

Copies of the Final Annual Action Plan and a summary of it will be made available to the public for free and within two days of a request. In addition, copies will be available at the locations specified above in the section, "Public Access to Information".

D. "AMENDMENTS" TO THE ANNUAL ACTION PLAN and/or CONSOLIDATED PLAN

The Final Annual Action Plan will be amended anytime there is: a change in one of the priorities presented on the HUD-required Priority Table; a change in the use of money to an activity not mentioned in the Final Annual Action Plan; or a change in the purpose, location, scope, or beneficiaries of an activity (described more fully later). The public will be notified whenever there is a substantial amendment. Substantial

Amendments will require a Public Hearing prior to the approval of such amendments. Minor amendments will be approved by City Council however no public hearing will be necessary.

“Substantial” Amendments.

The following will be considered “substantial” amendments:

1. A change in the use of CDBG money from one activity to another.
2. A change in the use of HOME money from one activity to another.
3. The elimination of an activity originally described in the Annual Action Plan.
4. The addition of an activity not originally described in the Annual Action Plan.
5. A change in the purpose of an activity, such as a change in the type of activity or its ultimate objective; for example, a change in a construction project from housing g to commercial.
6. A meaningful change in the location of an activity.
7. A change in the scope of an activity, such that there is a 20% increase or decrease in the amount of money allocated to the activity.

Public Notice and Public Hearing for Substantial amendments.

There must be reasonable notice of a proposed Substantial Amendment so that residents will have an opportunity to review it and comment on it. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for Substantial Amendments:

1. A detailed written description of the proposed Substantial Amendment will be made available to the public.
2. There will be a public hearing regarding the proposed Substantial Amendment conducted by the Mayor and City Council. This public hearing will not take place until the public has had adequate time to review the proposed Substantial Amendment.
3. In preparing a Final Substantial Amendment, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Final Substantial Amendment will have a section that presents all comments, plus explanations why any comments were not accepted.

E. The Consolidated Annual Plan Evaluation Report (CAPER)

Every year, the City of Greenville must send into HUD a CAPER within 90 days of the close of the program year. In general the CAPER must describe how funds were actually used and the extent to which these funds were used for activities that benefited low and moderate-income people.

Public Notice and Public Hearing for the CAPER.

There must be reasonable notice that the CAPER is available so that residents will have an opportunity to review it and comment on it. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for CAPERS:

1. There will be 30 days advance notice of the availability of the CAPER before the report is submitted to HUD.
2. To begin to meet the HUD annual requirement that the City hold at least two public meetings regarding the upcoming Consolidated and/ or Action Plan, the City Council will also consider proposals for Projects to be considered for the following Program Year, at the CAPER Public Hearing.

G

RESOLUTION NO. 07- 35

**A RESOLUTION OF THE CITY OF GREENVILLE ADOPTING A
RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN,
AS REQUIRED UNDER SECTION 104 (d) OF THE HOUSING AND COMMUNITY
DEVELOPMENT ACT OF 1974 AS AMENDED**

WHEREAS, Section 104 (d) of the Housing and Community Development Act of 1974 (ACT), as amended, and implementing regulations require that each applicant for Community Development Block Grant (CDBG) funds must adopt, make public and certify that it is following a residential anti-displacement and relocation assistance plan; and

WHEREAS, the City of Greenville receives funding from the U. S. Department of Housing and Urban Development (HUD) for Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funds;

NOW, THEREFORE, BE IT RESOLVED, that the Mayor and City Council of the City of Greenville, do hereby adopt the residential anti-displacement and relocation assistance plan as described below.

**RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION
ASSISTANCE PLAN**

In accordance with this statute, the City of Greenville will replace all occupied and vacant occupiable liveable low/moderate-income dwelling units demolished or converted to a use other than low/moderate-income housing as a direct result of activities assisted with funds provided under the Housing and Community Development Act of 1974, as amended, as described in 24 CFR 570.606 (b) (1).

All replacement housing will be provided within 3 years of the commencement of the demolition or rehabilitation relating to conversion. Before obligating or expending funds that will directly result in such demolition or conversion, the City of Greenville will make public and submit to the U. S. Department of Housing and Urban Development, the following information in writing:

1. A description of the proposed assisted activity;
2. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than low/moderate-income dwelling units as a direct result of the assisted activity;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. The general location on a map and approximate number of replacement dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;
5. The source of funding and a time schedule for the provision of replacement dwelling units;

6. The basis for concluding that each replacement dwelling unit will remain a low/moderate-income dwelling unit for at least 10 years from the date of initial occupancy; and
7. Information demonstrating that any proposed replacement of housing units with smaller dwelling units (e.g., a 2 bedroom unit with two 1 bedroom units), or any proposed replacement of efficiency or single room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs priorities identified in the City of Greenville's approved Consolidated Plan (CP).

The City of Greenville will provide relocation assistance, as described in the ACT and implementing regulations, to each low/moderate-income household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of assisted activities. Consistent with the goals and objectives of activities assisted under the Act, the City of Greenville adopts the following policies to minimize displacement of persons from their homes:

A. NONDISCRIMINATION STATEMENT

There will be no discrimination based on race, age, sex, national origin, religion, and ethnic background in the provision of information, counseling, referrals, or other relocation services to persons displaced by CDBG activities. The practices and methods of the administration of this Residential Anti-displacement and Relocation Assistance Plan will not result in the displacement of persons because of their race, color, religion, sex, age, handicap, or national origin.

All information and counseling to tenants will include:

- Opportunities to select a replacement dwelling from a full range of neighborhoods within the total housing market.
 - Individual rights under the Federal Fair Housing laws.
 - How to search for suitable replacement housing.
1. Coordinate code enforcement with rehabilitation and housing assistance programs.
 2. Evaluate housing codes and rehabilitation standards in reinvestment areas to prevent undo financial burden on established homeowners and tenants.
 3. Establish counseling to provide homeowners and tenants with information on assistance available to help them remain in their neighborhoods in the face of revitalization pressures.

B. DISPLACED PERSONS

Any person that is moved from real property or moves his or her personal property from real property permanently as a direct result of one or more of the following activities:

1. Acquisition of or written notice of intent to acquire, or initiation of negotiations to acquire, such real property, in whole or in part, for a project.
2. Rehabilitation or demolition of such real property for a project.
3. Rehabilitation, demolition, or acquisition, (or written notice of intent) of all or part of other real property on which the person conducts a business or farm operation, for a project.

C. PERSONS NOT ELIGIBLE FOR ASSISTANCE

A person is not eligible for relocation assistance under the provisions of the URA if any of the following occurs:

- The person was evicted for serious or repeated violation of the terms and conditions of the lease or occupancy agreement, violations of applicable Federal, State or local law, or other good cause. However, if the person was evicted only to avoid the application of URA, then that person is considered displaced and is eligible for assistance.
- The person has no legal right to occupy the property under State or local law.
- The Municipality determines that the person occupied the property to obtain relocation assistance and the HUD field office concurs in that determination.
- The person is a tenant-occupant that moved into the property after a certain date, specified in the applicable program regulation, and before leasing and occupying the property, the City of Greenville or its subgrantee provided the tenant-occupant written notice of the application for assistance, the project's impact on the person, and the fact that he or she would not qualify as a "displaced person" because of the project.
- The person is a tenant-occupant of a substandard dwelling that is acquired or a tenant-occupant of a dwelling unit to which emergency repairs are undertaken and the HUD Field Office concurs that:
 - Such repairs or acquisition will benefit the tenant;
 - Bringing the unit up to a safe, decent, and sanitary condition is not feasible;
 - The tenant's new rent and average estimated monthly utility costs will not exceed the greater of: the old rent/utility cost or 30 percent of gross household income; or
 - The project will not impose any unreasonable change in the character or use of the property.
- The person is an owner-occupant of the property who moves because of an arm's length acquisition.
- The City of Greenville or subgrantee notifies the person that they will not displace him or her for the project.
- The person returns the right of use and occupancy of the real property for life following the acquisition.
- The City of Greenville determines that the person is not displaced as a direct result of the acquisition, rehabilitation, or demolition for the project and the HUD Field Office concurs in the determination.

MINIMIZING DISPLACEMENT

As a general philosophy, the City of Greenville will take reasonable steps to minimize displacement occurring as a result of its CDBG and HOME activities. This means that Community Development Division will:

1. Consider if displacement will occur as a part of funding decisions and project feasibility determinations.

2. Assure, whenever possible that occupants of buildings to be rehabilitated are offered an opportunity to return.
3. Plan substantial rehabilitation in "stages" to minimize displacement.
4. Meet all HUD notification requirements so that affected persons do not move because they have not been properly informed about project plans and their rights.

ANTI-DISPLACEMENT POLICY

The City of Greenville policy is to minimize to the greatest extent feasible, the displacement, whether permanently or temporarily, of persons (families, individuals, businesses, nonprofit organizations, or farms) from projects funded with CDBG or HOME involving single or multifamily rehabilitation, acquisition, commercial rehabilitation, demolition, economic development, or capital improvement activities.

Projects that the City of Greenville deems beneficial by that may cause displacement may be recommended and approved for funding only if the City or its subgrantee demonstrates that such displacement is necessary and vital to the project and that they take efforts to reduce the number of persons displaced. Further, they must clearly demonstrate that the goals and anticipated accomplishments of a project outweigh the adverse effects of displacement imposed on persons who must relocate.

DISPLACEMENT ASSISTANCE

Consistent with the goals and objectives of the CDBG and HOME programs, the City will take all reasonable steps necessary to minimize displacement even temporarily of very low-income persons by persons from a higher income group. If the City displaces a low or moderate-income household, that household becomes eligible for certain relocation payments. The assistance applies to those persons residing in the residence at the time the project is approved. Each residential person who earns less than 80 percent of the area median income and who is required to move permanently as a result of a project under CDBG or HOME program shall be entitled to assistance based on the following procedures:

1. Notices and Other Advisory Services

All occupants are entitled to timely notice explaining whether or not they will be displaced. Occupants to be displaced must be informed of their eligibility for relocation assistance and the nature of the assistance. Those occupants not to be displaced must be informed of the terms and conditions under which they may occupy the property upon completion of the project. A displaced person must be advised of his or her rights under the Fair Housing Act (42 U.S.C. 3601-19). Each notice shall be personally served or sent by certified or registered first-class mail, return receipt request, date of delivery and documented in the agency files.

2. Moving Expenses

A displacee may choose to receive payment for moving and related expenses by reimbursement of Actual Moving and Related Expenses, or Receipt of a Fixed Payment based upon the current Uniform Relocation Act (URA) schedule.

3. Replacement Housing Assistance

A displaced tenant or owner occupant for 90 days that rents a replacement dwelling is entitled to a payment not to exceed \$5,250.00. This payment may be for a period of 42 months and is offered in order to reduce the monthly rent and estimated average monthly cost of utilities for a comparable replacement dwelling.

4. Section 8 Assistance

Where possible, eligible persons will be offered Section 8 Housing Certificate of Family Participation or Voucher. The Certificate or Voucher will reduce the monthly costs (rent and utilities) to 30 percent of income. The definition of a suitable replacement dwelling shall be:

- a. Decent, safe, and sanitary.
- b. Available at a monthly housing cost (rent and utilities) that does not exceed 30 percent of the gross income of all members of the individual's household who are 18 years of age or older.
- c. Located in an area that is not subject to unreasonable adverse environmental conditions, is not generally less desirable than the location of the displaced person's dwelling with respect to public utilities, and commercial and public facilities, and is reasonably accessible to the person's place of employment (or to sources of employment if the person is unemployed but seeking work).

F. RESIDENTIAL PERSONS TEMPORARILY DISPLACED

Each residential person who earns less than 80 percent of the median income and who is required to move temporarily as a direct result of a project assisted under a CDBG or HOME Program shall be entitled to assistance in accordance with the following policies:

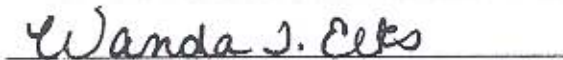
1. Timely Information. The person shall be personally contacted or sent certified or registered first-class mail, return receipt requested, notice of temporary displacement. The notice shall fully explain the reason for the temporary displacement and indicate the person's eligibility for relocation assistance.
2. Advisory Services. The individual shall be provided appropriate advisory services to minimize hardships in adjusting to the relocation.
3. Replacement Housing Assistance. No displacee earning less than 80 percent of median income shall be required to move temporarily unless given a reasonable choice of opportunities to lease and move to a suitable replacement dwelling.
4. Temporary Relocation Housing. The displacee shall be reimbursed for any increase in rent and utility costs in the temporary unit (The utility cost increase may be estimated) incurred in connection with the move. The housing offered for the temporary period shall be decent, safe, and sanitary. These funds will be paid by the investor-owner. CDBG or HOME funds can be used for this purpose.
5. Moving expenses. The displacee must be reimbursed by the investor-owner for all reasonable out-of-pocket expenses. CDBG or HOME funds can be used for this purpose.

NOW, THEREFORE BE IT RESOLVED that the City Council of the City of Greenville, North Carolina hereby adopts the Residential Anti-displacement and Relocation Assistance Plan for the City of Greenville dated May 10, 2007.

Adopted this 10th day of May, 2007.


Robert D. Parrott, Mayor

ATTEST:


Wanda Elks, City Clerk

Handwritten notes:
N.C.
10/10/07
10/10/07

CERTIFICATION

I, Wanda T. Elks, City Clerk of the City of Greenville, North Carolina do hereby certify that the attached Resolution No. 07-35 has been unanimously adopted by the Greenville City Council in a regular meeting held on May 10, 2007 for a Residential Anti-displacement and Relocation Assistance Plan to be effective May 10, 2007. The copy attached is true and accurate as adopted.

This the 10th day of May 2007.

Wanda T. Elks
Wanda T. Elks, City Clerk

H

**CITY OF GREENVILLE
AFFIRMATIVE MARKETING POLICY
(EQUAL HOUSING OPPORTUNITY)**

It is the policy of the Community Development Department's Housing Division of the City of Greenville to not discriminate against any person on the basis of race, color, national origin, sex, religion, familial status, or disability:

1. In the sale or rental of housing or residential lots;
2. In advertising the sale or rental of housing;
3. In the finance of housing;
4. In the provision of real estate brokerage services; or
5. In the appraisal of housing.

STATEMENT

This Affirmative Marketing Policy ("the Policy") is developed for use in HOME Investment Partnerships Program ("HOME") funded projects in accordance with the HOME Program regulations, including but not limited to 24 CFR 92.351, of the U.S. Department of Housing and Urban Development ("HUD"). The Policy is a commitment by the City of Greenville, a participating jurisdiction, and the HOME-funded participant ("Beneficiary"). The Beneficiary shares responsibility with the City to inform the public about the Federal Fair Housing Laws, soliciting eligible persons without regard to race, color, national origin, sex, religion, familial status or disability into the affordable housing market and evaluating the effectiveness of these marketing efforts.

This Affirmative Marketing Policy is documented and maintained in the Housing Division records, and shall be included in all HOME project proposals and agreements and HOME project files. The Beneficiary is held to the terms of the Policy by the requirement in the applicable HOME Subrecipient or HOME/Community Housing Development Organization ("CHDO") Agreement.

PURPOSE

In accordance with the regulations of the HOME Program and in furtherance of the City of Greenville's commitment to fair housing and equal housing opportunity, this Policy establishes

procedures to affirmatively market rental or residential units constructed or rehabilitated under the HOME Program. These procedures are designed to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged are provided an opportunity to apply.

1. METHODS THE CITY WILL USE TO INFORM THE PUBLIC, POTENTIAL TENANTS, AND POTENTIAL OWNERS ABOUT FEDERAL FAIR HOUSING LAWS AND AFFIRMATIVE MARKETING POLICIES AND PROCEDURES

A. The Community Development Department's Housing Division of City of Greenville shall be responsible for implementing the Affirmative Marketing Policy and evaluating its effectiveness as required by the HOME Program. This responsibility shall include, but is not limited to the following:

- 1) Inform the community about its Affirmative Marketing Policy through periodic updates with its Affordable Housing Partners, through training workshops with its HOME Subrecipients and HOME/CHDO applicants, advertisements in the local newspapers of general circulation and other media outlets targeted to special groups and areas, and by posting the Policy on the City website (www.greenvillenc.gov).
- 2) Display the HUD Equal Housing Opportunity ("EHO") logo or slogan on all graphic presentations by the City concerning the HOME Program including but not limited to press releases and advertisements.
- 3) Provide the beneficiary copies of the brochure "Fair Housing, Equal Opportunity for All" provided by HUD or a similar document at the time they receive (or apply for) HOME funding. The beneficiary shall provide initial homeowners, tenants, and rental property owners with copies.
- 4) Provide general information and telephone reference numbers to persons contacting the Housing Division with questions regarding Affirmative Marketing, Federal Fair Housing, tenant's rights, affordable housing, special needs housing and correction of substandard conditions in tenant-occupied dwellings.

2. REQUIREMENTS AND PRACTICES ALL HOUSING PROJECT BENEFICIARIES MUST ADHERE TO IN ORDER TO CARRY OUT THE CITY'S AFFIRMATIVE MARKETING POLICY.

At a minimum, each Beneficiary of a housing project assisted or partially assisted with HOME Program funds shall:

- 1) Incorporate an EHO logo or statement in its correspondence (including any lease or purchase agreement), which shall be used relating to the HOME program.
 - 2) Affirmatively state a position of equal opportunity in housing when advertising the units or vacancies. *At a minimum*, each Beneficiary must:
 - a. Use the EHO logo in print and visual electronic advertising media;
 - b. Broadcast an "Equal Housing Opportunity" statement if radio advertising is utilized; and
 - c. Display the HUD Fair Housing poster in a high traffic area of its central sales/rental office.
3. PROCEDURES TO BE USED BY BENEFICIARIES OF PROJECTS THAT HAVE 5 OR MORE HOME ASSISTED UNITS TO INFORM AND SOLICIT APPLICATIONS FROM PERSONS IN THE HOUSING MARKET AREA WHO ARE NOT LIKELY TO APPLY FOR HOUSING WITHOUT SPECIAL OUTREACH
- A. Each Beneficiary of a project that has 5 or more HOME assisted units, shall at a minimum:
- 1) Consider factors such as price or rent of housing, the racial/ethnic characteristics of the neighborhood in which housing is to be located, the population within the housing market area, public transportation routes, etc., to determine which group(s) of the existing population are believed to be the *least likely to apply without special outreach*. The Beneficiary may use census data, neighborhood surveys, and information from local government agencies, real estate associations and community-based organizations as acceptable sources to gather this information.
 - 2) Describe the marketing plan to be used in the initial sales/rental phase as well as the ongoing marketing phase, to attract all segments of the eligible population, especially those groups designated as least likely to apply. This shall include the type of commercial media to be used, identity of the

circulation or audiences of the media identified in the plan, and other community contacts and organizations used to reach populations needing special outreach.

- 3) Post and/or distribute information on the project to any such special needs groups that are being targeted for residence in the units.

4. RECORDS THAT WILL BE KEPT DESCRIBING ACTIONS TAKEN BY THE CITY AND BENEFICIARIES TO AFFIRMATIVELY MARKET UNITS AND RECORDS TO ASSESS ACTIONS.

A. The City of Greenville will keep the following records:

- 1) Copies of all meeting agendas and related materials of the City's Affordable Housing Loan Committee pertaining to this Policy, and all agendas and training materials of any HOME/CHDO training workshop pertaining to this Policy.
- 2) Copies of all press releases, advertisements and other written and electronic materials that pertain to this Policy

B. The City shall also require all Beneficiaries assisted with HOME funds to maintain records of how vacancies were advertised. All Beneficiaries shall maintain a record of classified advertisements, flyers, electronic media spots, or other marketing materials used to affirmative market HOME assisted units for two years.

C. The Beneficiary of a project that has 5 or more HOME assisted units shall also maintain a record of applicants for vacant units with a general profile of the applicant and shall denote the following:

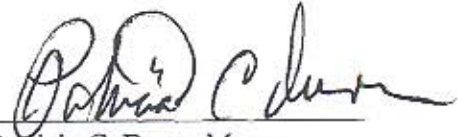
- 1) How the applicant learned of the vacancy;
- 2) Outcome (acceptance or rejection) of the applicant; and
- 3) If rejected, why.

D. Each Beneficiary shall submit to the City annual reports through June 30th, as established by the HOME or HOME/CHDO Agreement, identifying those served.

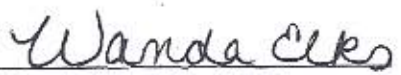
5. DESCRIPTION OF HOW THE CITY OF GREENVILLE WILL ASSESS THE SUCCESS OF AFFIRMATIVE MARKETING ACTIONS, AND WHAT CORRECTIVE ACTIONS WILL BE TAKEN.

- A. The Affirmative Marketing Policy will be assessed on an annual basis by June 30th and will include a summary of the "good faith efforts" taken by the City and by HOME and HOME/CHDO Beneficiaries in the CAPER.
- B. The City will compare the information compiled in Section 4: "Record keeping," and evaluate the degree to which statutory and policy objectives were met. If the required steps were taken, the City will make an assumption that good faith efforts were made to carry out these procedures.
- C. In conjunction with the annual on-site monitoring reviews conducted by the City, the Beneficiary shall produce records of:
 - 1) Affirmative marketing efforts;
 - 2) Applicants; and
 - 3) Outcome.
- D. The City will take corrective action if it is determined that a Beneficiary has failed to carry out affirmative marketing efforts as required. The City will provide written notice to the Beneficiary of the problems that have been identified and the corrective action steps that need to be taken. The City shall follow all procedures for taking corrective action as provided in the City of Greenville Consolidated Plan for the HOME Program.

Adopted this 11th day of June, 2009.


 Patricia C. Dunn, Mayor

Attest:


 Wanda Elks, City Clerk