



Greenville
NORTH CAROLINA

Find yourself in good company

2015 – 2016 Annual Action Plan

**Community Development Block Grant (CDBG) &
HOME Investment Partnership Funds**



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I. EXECUTIVE SUMMARY

A. Purpose

The Annual 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. Furthermore, this plan serves as a Planning, Programming, Budgeting System (PPBS).

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 2015-2016 Annual Action Plan represents the third (3rd) year of the City of Greenville's Consolidated Plan. The current Consolidated Plan was approved on June 13, 2013, by the City Council. The plan identifies a comprehensive strategy to address community needs for the five (5) year period of 2013-2018. Moreover, the plan associates goals and objectives with current priority needs throughout the same five (5) 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:

- Reduce substandard housing and blight
- Preserve and increase owner-occupied housing for low income families and individuals
- Improve public infrastructure within communities of low wealth
- Increase and cultivate economic opportunities within low wealth communities
- Preserve and retain housing for lower income households through scattered site home rehabilitation
- Produce affordable housing opportunities for both owner occupants and renters
- Elimination of environmental hazards in targeted low income communities
- Promote efforts to develop and maintain housing for special needs populations
- Support programs that provide enrichment to low income communities

C. Geographic Area

Greenville, North Carolina lies in the eastern portion of the state. It is approximately an hour and half from both the beach and the state capital (Raleigh). Greenville, N.C. is the county seat of Pitt County. Not only is Pitt County one of the largest counties in N.C., but Pitt County also has 646 square miles of agricultural land. The county has an estimated population of 174,263, with the City of Greenville having an estimated population of 89,130 according to the American Community Survey census data. This makes Greenville the tenth largest city in the State of North Carolina. Greenville covers 31.8 square miles of Pitt County, and its extra-territorial jurisdiction extends one (1) mile outside the city limits.

From 2000 to 2010, the population increased by almost 40%, growing by 39.8% from 60,476 in 2000 to 84,544 in 2010. Over the past twenty (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 more specifically within the West Greenville Redevelopment Area, the 45-Block Revitalization Area, and areas north of the Tar River. (**Appendix D**). The West Greenville Redevelopment Area can be defined as bounded to the north by the Tar River, to the west by Memorial Drive, to the east by the Center City, and to the south by the 10th Street Connector.

The West Greenville 45-Block Revitalization Area lies within the overall Redevelopment Area. The “45-Block” is a very specific strategy that has been implemented since 2003. This area can be defined as bounded to the north by Fifth Street, to the west by Bancroft Street, to the east by Albemarle Avenue and to the south by Fleming Street. These areas have been community development target areas for City of Greenville for many years. Another location mentioned above is the area north of the Tar River. Since the flood of 1999, there has been a significant lack of investment within this zone of the city.

Recent efforts have targeted clusters within each area in an attempt to address urgent 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 D**). 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 Needs

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. There are funds set aside for the 2015-2016 Program Year to be used for downpayment assistance for low-moderate income homebuyers within the City of Greenville. These 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.

Downpayment assistance decreases the amount of financing and/or funding a homebuyer needs in order to purchase a home. To date, we have assisted fifty-three (53) families with funding from the North Carolina Housing Finance Agency totaling \$825,555 and sixty-five (65) families under the HOME Program totaling \$760,699. 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 five (5) years. Thirty-two (32) families have received assistance totaling \$67,959.

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. These opportunities are provided via properties purchased by the City with local public bond funds and HOME Investment Partnership funds. Upon acquisition and installation of infrastructure, the City then makes lots available to nonprofit and for profit agencies for development.

All development proposals are accepted based on a reasonable price per square foot and the developer's ability to meet building specifications as required by the Request for Proposal. As a direct result of the City's purchase of the land and the infrastructure improvements, the lots become more affordable; therefore, reducing the cost to the homebuyer. As lots are sold to eligible homebuyers, the funds for the lot cost are sometimes recaptured and used to fund future developments.

c. Owner-Occupied Home Rehabilitation

The City offers grants/loans that assist and encourage preservation of our older housing stock. Home rehabilitation supports homeowners who strive to bring their properties up to today's building standards, and ensures the health, safety, and general welfare of the community. The grant/loans are based on income limits that are provided by the U.S. Department of Housing and Urban Development (See Appendix). A percentage of the total cost of the work applied can either be forgiven or decreased based upon an applicant's gross income and family size.

The City of Greenville has offered the owner-occupied home rehabilitation program since the mid 1970's. This program has been significantly successful in keeping low-moderate income families in homes that are safe, healthy, affordable, and energy efficient. Recently, staff has also noticed an additional benefit of this program – it also has the ability to preserve the historic character of a neighborhood.

d. Partnerships

The City of Greenville partners with local nonprofit agencies to provide Homeownership Counseling and Workshops for potential homebuyers. The City also offers a Homeownership Academy that provides participants with the opportunity to gain working knowledge of the home buying process and to prepare financially to purchase a home within the West Greenville Redevelopment Area, or in other neighborhoods across the City. At program completion, participants receive a certificate for \$1,000 redeemable at closing to assist with the purchase of an existing or new home within the city limits.

In addition to the homeowner partnerships, the City partners with Pitt Community College and East Carolina University for workforce development. Both organizations have Memorandums of Understanding that connect them to activities and projects that the City believes are imperative to community and economic development.

Staff partnered with Metropolitan Housing Development Corporation to construct a new single family home within target area. The home is complete and currently has a tenant residing there who has signed a lease-purchase agreement. In 2015,

there are three (3) single family homes scheduled to begin construction in January. Staff anticipates an additional 3 – 5 single family homes will be constructed in 2015.

2. Community Development Strategies

a. Revitalization

The intended actions in the West Greenville 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 that address the social issues of the community, and to provide quality economic development and commercial opportunities for the area and for its residents.

In addition, the City intends to make application in 2015 for an amendment to the 2013-2018 Five (5) Year Consolidated Plan. Staff is in the process of developing boundaries and measurable goals for the PROPOSED West Greenville Neighborhood Revitalization Strategy Area (NRSA). The proposed NRSA will encompass the current West Greenville Redevelopment area, but it also expands those boundaries to the north and the south significantly.

b. Multi-family Development

Located within the City limits of Greenville, Winslow Pointe is a new community composed of eighty four (84) affordable apartments at 40%, 50% and 60% restriction on income. The property will offer 1, 2, and 3- bedroom apartments. The site is located on the Northwest corner of Hooker and Burrington Road, which surrounds the old Winslow home. This location is in the central part of Greenville located near JH Rose High School, shopping, parks, and medical facilities. The natural boundaries that surround the site make this property unique for an area within the city limits in close proximity to so many services.

This project was funded in part with HOME Investment Partnerships funds, Low Income Housing tax credits and private investments. The NRP Group and its affiliated company formed the construction and development team. The project was completed in 2013, and the City was able to leverage over \$11 million on the Winslow Pointe development. Recently, developers expressed an interest to begin Phase 2 of Winslow Pointe. Staff has discussed this phase with the development

team, and they have also noted that they will pursue tax credits from the North Carolina Housing Finance Agency (NCHFA).

In 2014, the City of Greenville will also provide HOME Investment Partnership funds to multi-family developers as gap funding. There was only one (1) interested developer in the 2014-2015 fiscal year. The developer proposed a low income senior housing development, which is located within the Medical District. Therefore, the site is within close proximity to shopping, medical care, public transportation, and other services.

The aforementioned development is named Parkside Commons. This project was granted \$150,000 of HOME funds from the City, and they were also a recipient of the 2014 Low Income Housing Tax Credits provided by NCHFA. This project is slated to begin construction during the Spring 2015 and will have ninety-eight (98) affordable senior units.

c. Infrastructure Improvements

Planning and design work were completed in 2011 on two (2) major public infrastructure projects that collectively will help to reshape the functionality and image of Greenville's urban core. Two (2) 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.

Currently, staff is working on the planning and design of West Fifth Streetscape Phase II. Phase II extends four (4) city blocks, and the same treatment that the Gateway project received is also planned for this project. This portion of the streetscape will provide a more sustainable pedestrian experience, and will provide much needed traffic and utility upgrades. The planning and design is expected to be complete by early 2015. Staff anticipates that a conceptual drawing, construction plans, and a financial implementation plan will be delivered on or before Spring 2015.

A new activity for 2014 was the Lincoln Park Neighborhood Redevelopment. This activity required a host of infrastructure improvements. For example, staff had to manage the abandonment, extension, and creation of water and sewer lines. Furthermore, this activity requires sidewalks, curb and gutter, and street lighting improvements. Staff completed the water and sewer abandonment within the area; however, the sidewalks, curb and gutter, and street lighting still needs to occur in 2015.

Lincoln Park is a neighborhood within the urban core. This portion of the city is very old. Therefore, many infrastructure improvements are necessary. The City owns sixteen (16) lots within the neighborhood, and will help facilitate the construction of new, affordable, single-family homes. These homes will be occupied by low-moderate income homeowners, renters, and those who are eligible for the lease-purchase option.

In addition, staff anticipates that there will be other infrastructure improvements throughout the West Greenville Target Area. This target area will require future improvements because of the age of the infrastructure. West Greenville is within the urban core, and is the oldest area within the city limits.

3. Economic Development Strategies

a. Facade & 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 investments into the area.

The Greenville Redevelopment Commission developed the Building Blocks Facade and Site Improvement Grant Program to provide an incentive to property and business owners to make improvements to their properties. These programs provide property owners, tenants, architects, and contractors with recommended design standards for exterior improvements and rehabilitation to commercial buildings in the West Greenville Redevelopment Area.

The Dickinson Avenue Corridor Study is being conducted this year. The Office of Economic Development is providing local funds for this study. A portion of the corridor is within the West Greenville Redevelopment Area. Moreover, there are multiple commercial structures situated along this section of the corridor. Commercial structures are not a plentiful resource within the West Greenville Redevelopment Area. Thus, staff has planned to provide assistance to property owners along this stretch of the corridor.

b. Small Business Incubator/ Commercial Center

The Redevelopment Commission of Greenville contracted with the Small Business and Technology Development Center (SBTDC) in 2012, 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's mission will be to create an open, business-first, incubation facility. The facility will cultivate entrepreneurship, promote economic development, and assist in community revitalization within the West Greenville Redevelopment Area. CDBG funds will be used to supplement the project.

After several years of focus group meetings, feasibility studies, and minor marketing efforts – city staff is still working to build a strong enough coalition to finance and operate a stand-alone incubator. However, in recent months, staff has identified an alternative solution. This solution ties together two (2) separate initiatives that the Community Development Department has already researched.

The West Greenville Redevelopment Area lies within a U.S. Department of Agriculture designated food desert, according to the Food Access Research Atlas. Therefore, the City has made it a top priority to recruit, facilitate, and potentially incentivize a deal that would bring a grocery store/commercial center to the area. Over the past couple of years, staff has partnered with other organizations to develop a feasible business plan for the incubator. As a result, staff has determined that a multi-use commercial center would better suit the needs of the community and small business.

4. Environmental Obstacles

Many of the low-moderate income communities across the nation face environmental hazards, and lack the funds to abate or mitigate them. The City of Greenville is not any different; however, the City is dedicated to providing funding for the elimination, abatement, or mitigation of some of these hazards.

a. Lead

The West Greenville Redevelopment Area exists within the oldest portion of the city. The neighborhoods in this area are part of the urban core. Many of the homes in these neighborhoods have both lead and asbestos materials inside of them. The City is dedicated to eliminating these hazards when possible. For example, when staff conducts owner-occupied home rehabilitations, it is the City's policy to test for and abate any lead or asbestos material. Staff will constantly seek out grant opportunities for lead or asbestos abatement.

b. Brownfield Development

The City of Greenville has been a recipient of EPA Brownfield funds in the past. The City will continue to seek grant opportunities to mitigate these types of circumstances. Many Brownfields exist within low-moderate income

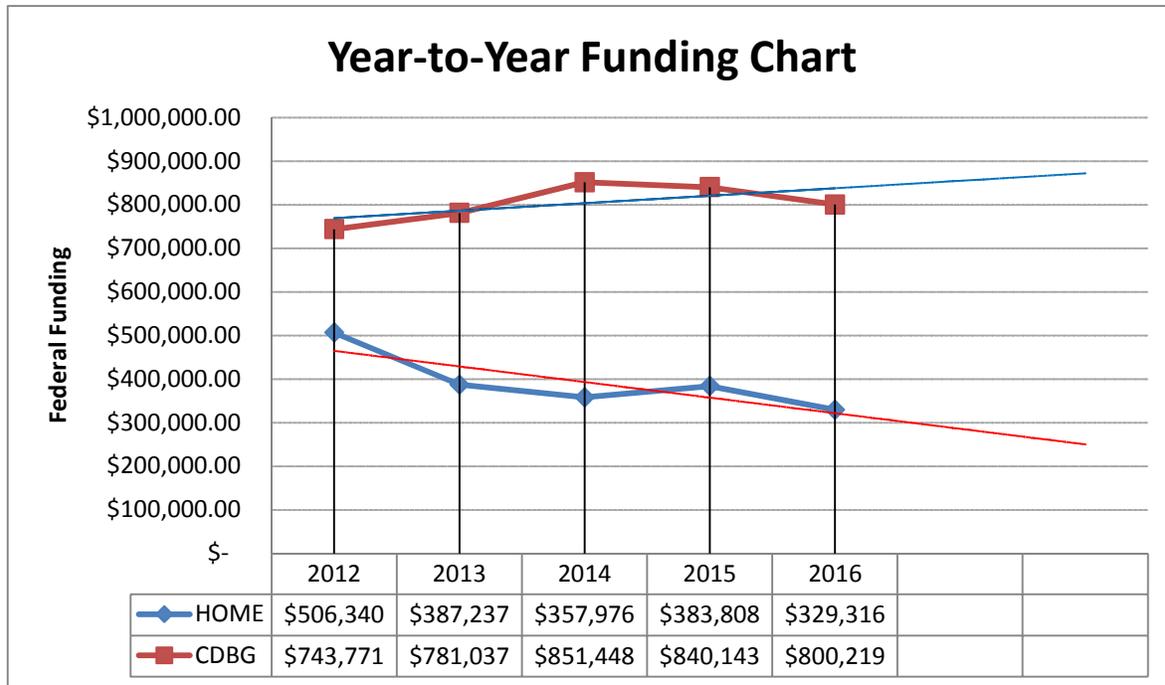
neighborhoods. These parcels should not be viewed as weaknesses or threats; rather they are opportunities for education and economic development.

Source of Funds



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, HOME Investment Partnership, general revenues, local Bond program, North Carolina Housing Finance Agency, private lending institutions and private developers. The graph below depicts past federal funding, but it also provides a forecast of funding as well.



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 Community in 1994. As an Entitlement Community, the City receives an annual funding allocation 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 Partnerships Program

The HOME Investment Partnerships program was created by the National Affordable Housing Act of 1990 to create local partnerships for providing decent affordable housing to lower income households. This program seeks to encourage local jurisdictions to 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.

In January 2008, the City Council of Greenville approved disbanding the Consortium partnership and submitted application to become a “Participating Jurisdiction” for HOME funding. This Action Plan represents Greenville’s second year as a HOME Participating Jurisdiction.

Local match requirement for the 2013-2014 HOME Program is approximately \$177,000. These funds come from local funds earmarked for Affordable Housing and for meeting match requirements. The funds will be used to augment HOME funded projects. The Greenville HOME program currently has a match credit of \$960,067.87, which will be carried over to the following year. Despite the match credit, the City continues to identify a match with all projects, evidence of which is detailed on the match log.

C. Affordable Housing Bond Program

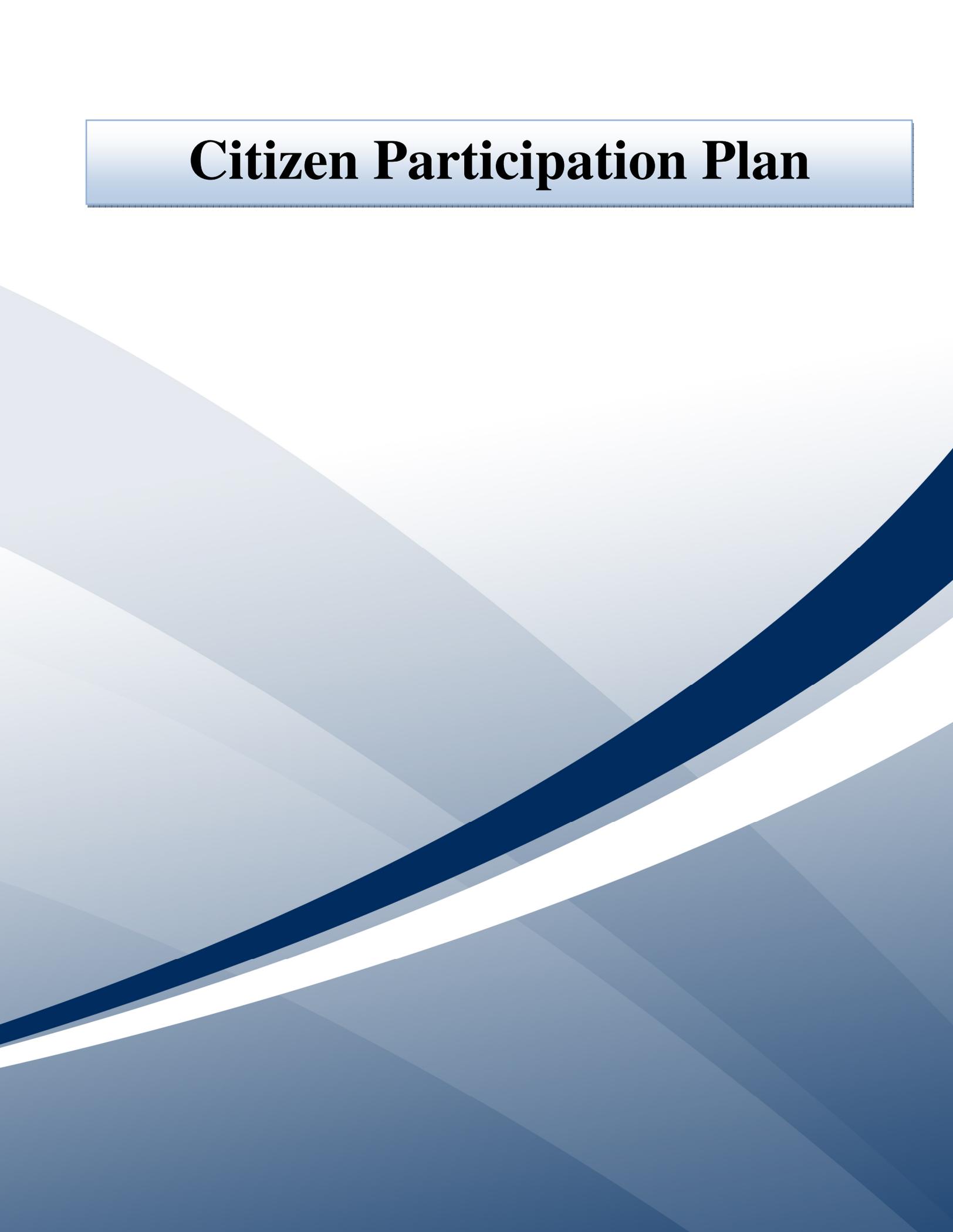
On November 2, 1992, the citizens of Greenville approved a \$5 million bond referendum for affordable housing. The funding was divided into three (3) revolving loan categories. The categories include homeownership, land banking, and elderly housing rehabilitation. Loans are continually recaptured and reinvested into the program fund to further efforts to promote and preserve affordable housing. This bond led 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 West Greenville 45-Block Revitalization program and other affordable housing initiatives of the City of Greenville.

In 2004, citizens approved \$10 million in bond referendums for the revitalization efforts in the Uptown and West Greenville 45-Block Revitalization focus area.

D. Funding Summary Chart

Source	Amount	Description
Community Development Block Grant (CDBG)	\$800,219	Funds will be used for administration, housing rehabilitation, acquisition, relocation, public service, public facility improvements, economic development and clearance/ demolition.
HOME Investment Partnership	\$329,316	Funds will be used for administrative cost, housing rehabilitation, new construction, down payment assistance, and CHDOs.
General Revenue	\$250,000	Funds to leverage administrative/operating costs for staff and other local municipal appropriations to support programs.
Affordable Housing Bond Program	\$100,000	A 1992 Bond Referendum for preservation and creation of affordable housing in the City of Greenville.
Private Investment	\$10,000,000	Private investment for first time homebuyers to purchase Affordable Housing Citywide to improve housing stock, and affordable multi-family development
Total All Sources	\$1,723,951	Approximate total of all sources minus Private Investment

Citizen Participation Plan

The background of the page features a series of overlapping, semi-transparent geometric shapes in various shades of blue and white. These shapes create a dynamic, layered effect, with some appearing as large triangles and others as curved bands that sweep across the page. The overall aesthetic is clean and modern, typical of a corporate or institutional report cover.

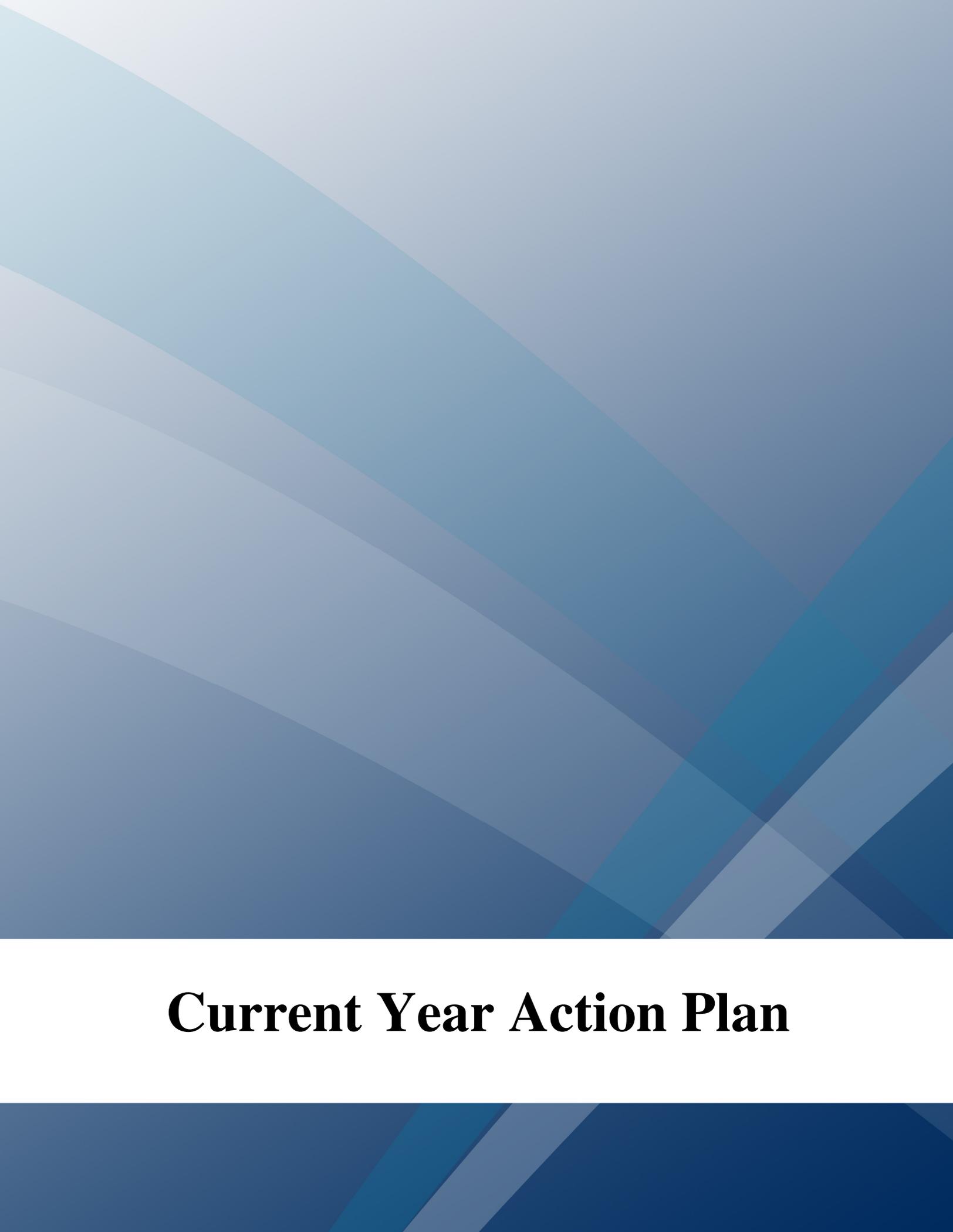
III. CITIZEN PARTICIPATION PLAN

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 2015-2016 Annual Action Plan by making a copy of the DRAFT plan available to the Affordable Housing Loan Committee members, Redevelopment Commission, Continuum of Care; 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 09, 2015 through April 09, 2015. In addition, a community meeting was held at Sheppard Memorial Library on Thursday, January 12, 2015 to get community input on the Plan. A second community meeting was held on February 5, 2015 at the Lucille Gorham Intergenerational Center. The following comments were received:

1. Partner to provide transitional housing for those who have been recently incarcerated.
2. Provide information in community meetings brochures.
3. Continue to provide homeownership opportunities.
4. Provide infrastructure upgrades when possible in low wealth communities (e.g. sidewalks, lights, and water & sewer).
5. Promote design standards to reduce utility costs and maintain the historic character of neighborhoods.
6. Create more affordable rentals.
7. Involve Realtors in new home construction projects.
8. Create projects for homeless population.
9. Improve non-profit capacity.
10. Consider new non-profit organizations in business incubator for capacity building.

There will be two (2) Public Hearings held for citizens to provide input. The first public hearing has already been held on December 11, 2014 at the City Council Meeting. The final public hearing will be held on April 9, 2015 during the City Council Meeting. No comments were received on the initial public hearing.



Current Year Action Plan

IV. ONE YEAR ACTION PLAN

A. Introduction

The 2015-2016 Annual Action Plan describes the CDBG and HOME activities proposed for the 2015 fiscal year. The Five (5) Year Consolidated Plan guides development of each annual action plan, and serves as a roadmap for the 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 occur.

The activities to be undertaken by the City of Greenville for the 2015-2016 fiscal year will include Program Administration, Owner-Occupied Housing Rehabilitation, New Construction, Clearance & Demolition, Public Service, Public Facility Improvement, Economic Development, Community Housing Development Organizations, Relocation Assistance, and Substandard Property Acquisition. Staff anticipates that a majority of the proposed activities will be completed within the program year - with a few extending 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 or facilitated the development of 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	18
Lincoln Park Redevelopment	TBD
Total	163

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 (3) main components to Outcome Performance Measurement System: Objectives; Outcomes; and Indicators.

1. Objectives:

Performance Measurement offers three (3) 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 (3) identified:

a. Availability/Accessibility

This applies to activities that make 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's 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 (4) 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 requires grantees to provide information on their achievements and investments since program objectives and activities are determined and implemented locally.

C. 2015-2016 Action Plan Projects:

1. Program Administration

Activity 2012-1

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:	\$32,000	HOME
	\$160,000	CDBG
	\$250,000	General Fund

2. Housing Rehabilitation/Urgent Repair

Activity 2012-2

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:	\$182,000	CDBG
	\$67,919	HOME

Performance Measurement

Objective: Providing Decent Housing

Outcome: Affordability

Output Indicators: Number of units rehabilitated Goal: 11

3. Acquisition of Substandard/Dilapidated Properties

Activity 2012-3

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, the City may need 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:	\$38,000	CDBG
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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

4. Relocation/Displacement Assistance

Activity 2012-4

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 the City may need 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: \$5,000 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: 0

5. Public Service

Activity 2012-5

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 City of Greenville citizens. Nonprofit housing and service providers must assist the under-served 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 2014 through September 2015.

Activity	Amount
Lucille Gorham Center	\$15,000
Boys and Girls Club	\$20,000
Literacy Volunteers	\$15,000
Center for Family Violence	\$25,400
STRIVE	\$25,000
Total	\$100,000

Funding Amount: \$100,000 CDBG

Performance Measurement of Public Service Activities

Objective: Creating Suitable Living Environment

Outcome: Sustainability

Output Indicators: Number of LMI households served **Goal: 225**

6. Public Facility Improvement

Activity 2012-6

Regulatory Citations: 24 CFR 570-202

Description: This program is designed to assist in the upgrade and design of public infrastructure located in low wealth communities. For example, the Lincoln Park Neighborhood Redevelopment will need sidewalks, upgraded street lighting, traffic calming, and updated water and sewer lines.

Funding Amount: \$200,000 CDBG

Performance Measurement

Objective: Creating Suitable Living Environment

Outcome: Sustainability

Output Indicators: Number of people in LMA **Goal: 500**

7. Clearance/Demolition

Activities 2012-7

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: \$15,000 CDBG

Performance Measurement

Objective: Creating Suitable Living Environment

Outcome: Affordability, Availability/Accessibility

Output Indicators: Number of units demolished **Goal:** 1

8. Community Housing Development Organization (CHDO) Activities

Activity 2012-8

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: \$49,397 HOME

Performance Measurement

Objective: Decent Affordable Housing

Outcome: Affordability

Output Indicators: Number of new single family units **Goal:** 1

9. Downpayment Assistance Program

Activity 2012-9

Regulatory Citations: 24 CFR Part 902.207

Description: Funds available for first time buyers who have completed homebuyer education classes.

Funding Amount: \$30,000 HOME
\$30,000 General Funds

Performance Measurement

Objective: Decent Affordable Housing

Outcome: Affordability

Output Indicators: Number of new homeowners **Goal:** 2

10. Economic Development

Activity 2012-10

Regulatory Citations: 24 CFR 570.203

Description: The purpose of the Business Plan Competition and the Façade Improvement Program is to provide an economic incentive to small business owners and other entrepreneurs both from within and without the redevelopment areas. Therefore providing an opportunity to create or expand small business enterprises within the bounds of West Greenville Redevelopment Areas.

Funding Amount: \$100,219 CDBG

Performance Measurement

Objective: Create Economic Opportunities

Outcome: Availability/Accessibility

Output Indicators: Number of jobs created **Goal:** 4

D. CDBG/HOME Funding Chart

Activity	HOME	CDBG
Planning & Administration	32,000	160,000
Housing Rehabilitation	67,919	182,000
Relocation	0	5,000
Acquisition	0	38,000
New Construction	150,000	0
Clearance/Demolition	0	15,000
Down Payment Assistance	30,000	0
CHDO	49,397	0
Public Facilities Improvement	0	200,000
Public Service	0	100,000
Economic Development	0	100,219
Total	\$329,316	\$800,219

Other Actions

The background features several broad, diagonal stripes. A light green stripe runs from the top-left towards the bottom-right. A light blue stripe runs from the top-left towards the bottom-right, positioned below the light green stripe. A dark blue stripe runs from the bottom-left towards the top-right. A lime green stripe runs from the bottom-left towards the top-right, positioned below the dark blue stripe.

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 will host a public education forum, a tour for Elected Officials, and a Housing Partners Reception. The upcoming fiscal year Fair Housing Month activities will include an educational seminar/forum and quarterly landlord/tenant workshops.

During fiscal year 2014-2015, the City will continue to use administrative dollars to fund fair housing activities. The City employs a staff person to coordinate all fair housing and other human relations activities, which is funded with general fund dollars. The staff person also provides assistance to citizens throughout the year with filing housing complaints.

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, December 2013. This section presents the Fair Housing Analysis Update for the 2013-2015 Five (5) Year Consolidated Plan. It primarily includes existing impediments to fair housing choice currently being addressed and the actions 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.

During fiscal year 2014-2015, the City will complete an update to the current Analysis of Impediments to Fair Housing Choice, in conjunction with a new Consolidated Plan.

In addition, the City will implement the following activities to address identified impediments to current Plan:

Impediment 1

Lack of affordable housing forces the lower income population to find alternative housing. Alternative housing may consist of “doubling up,” a practice where households combine to cut the expenses of housing. Others are forced to live in housing that is in poor condition 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. Lower income home seekers may attempt to follow financing recommendations such as using the City’s down payment assistance programs.

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, then it is possible that this serves to drive people to seek loans through brokers and subprime lenders. Therefore, a stronger push to promote homebuyer counseling appears to be an appropriate solution.

Additionally, the City plans to dedicate more time and resources in communities north of the river than it has in the past. Since 2003, West Greenville has seen the most investment from the City’s entitlement funds; however, the City does have “scattered site” programs that allow citizens from across the community to benefit from HUD entitlement funding. Residents living north of the river have lower incomes and the concentration of Hispanic residents is higher in this area. This small shift in focus will help to address housing burdens for this area of the City.

Furthermore, the City intends to continue its’ support of affordable housing tax credit developments outside of the low income census tracts. Also, the City will begin to investigate and evaluate the creation of a Neighborhood Revitalization Strategy Area (NRSA).

Impediment 2

Lack of education about discrimination and fair housing laws in Greenville result in citizens who are unaware of rights or where to report violations and lenders who may not be knowledgeable

about fair housing practices. 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. 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

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.

The City will continue its efforts to educate the public through Fair Housing month activities and a local loan counseling program. Further, the City's Community Relations Officer will continue to coordinate the City's community-wide Fair Housing Workshop annually and disseminate information throughout the year about Greenville's fair housing activities. Information may include monthly public service announcements through local media (radio, television, and newspapers) advertising fair housing mediation services and distribution of print materials to local merchants and residents advertising fair housing workshops and fair housing mediation services to residents of community development target areas.

Special outreach may be made to school-aged children to start early education on fair housing issues. Housing discrimination education programs can be developed around Fair Housing month. To avoid teaching laws in a stale format, the approach should be to explore opinions, beliefs and behavior in age appropriate ways. Additionally, a poster contest may be held as part of the month's activities and winning posters can be featured in advertisements and materials the City uses for its fair housing education generally.

Further, the City will encourage lenders, housing providers and their agents to know their responsibilities and to attend training on fair housing laws. Over the long term, the City will

promote the development of a voluntary affirmative action marketing agreement by the local Board of Realtors and Home Builders Association.

The City will provide assistance to residents in the resolution of housing complaints. The City's Community Relations Officer will refer discrimination complaints which cannot be resolved through mediation to the U.S. Department of Housing and Urban Development or the N.C. Human Relations Commission.

The City will continue to evaluate the need for the establishment of a local Fair Housing Ordinance and the effectiveness of the Fair Housing Plan.

Impediment 3

Substandard housing and low property maintenance contribute to the lack of safe, decent, and sanitary affordable housing. A pro-active property maintenance code enforcement 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 homeowners in rehabilitating substandard housing stock in an effort to keep those units affordable once renovations have been completed.

Impediment 4

Limited housing opportunities exist 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.

The City will also strive to convene working groups of providers that deliver services to the homeless, those at risk of homelessness, and special needs populations to establish referral networks that more easily connect those in need with available resources. Additionally, by convening these groups, service providers may find ways to share resources and maximize their efforts by working together.

Impediment 5

Lack of access to homeownership (Based on HMDA and apparent Predatory Lending Practices) limit housing choices.

This Impediment can be addressed in the 2013-2018 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 37% of the population, 18% of all home purchase mortgage applications come from black families/individuals. As a result, it appears that black applicants may be underrepresented with the problem worsening over recent years. Hispanics and Asians are also underrepresented in loan applications as compared to their share of the population. 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 in an older housing stock can have an undesirable effect on the community when it occurs in great numbers.

Plan

Mortgage brokers 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.

To educate potential homebuyers, the City will work to create homebuyer guides that inform first-time buyers and other purchasers about the process involved in locating, qualifying for, and securing a home. Steps such as inspection, negotiation, and closing would be explained as well as the roles of different players (real estate agents, loan officers, and others). Typical costs can be outlined as well. The Guide may include information on geographic areas that are not yet integrated to promote equal housing opportunity in these areas. Sections on housing resources and basic fair housing rights would be included as well. These guides should be produced in Spanish and any other language that has a concentrated population in Greenville at the time of publication. The City will also work with local agents and community groups to arrange house or neighborhood tours that allow residents to explore available opportunities that may be outside of their immediate surroundings.

Again, the solution lies in educating consumers, although it is difficult to reach them when they will not avail themselves of the opportunities. The City plans to address Impediment #1 (affordable housing) and Impediment #2 (education) during the program year 2014-2015. The City plans to make a HOME commitment in the amount of \$150,000 to an affordable senior housing development. Also, the City's Fair Housing Officer intends to continue educating the community about fair housing law and concerns. The City will continue to provide CDBG funding for eligible fair housing activities. For example, staff plans to visit several apartment communities and public housing communities to provide education days. These days will include topics such as tenant and landlord rights, and legal updates from our partners at Legal Aid of NC.

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 worse 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 (6) 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 made 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 all property rehabilitation projects undertaken by 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).

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.

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 Streets to Home and EXCEED, 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 sub-recipients, and Community Housing Development Organizations (CHDOs), are effectively organized to utilize all 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 groups. 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 Redevelopment 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 (4) 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 (3) 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 residents utilizing the Housing Choice Voucher program and City of Greenville HOME downpayment assistance program have purchased a new home, developed by a local Community Housing Development Organization.

I. Recapture Provisions

In accordance with the applicable homebuyer recapture/resale provision outlined in 24 CFR Part 92.254, City of Greenville has adopted the recapture provision. Greenville provides direct HOME subsidy, on a pro-rata basis, to eligible homebuyers, which includes down payment assistance and closing costs. Greenville provides HOME funds to its CHDO's to develop affordable housing. Greenville CHDO's have adopted the HOME recapture provision, with the exception of development of rental units. When CHDO's develop homeownership single-family housing, down payment assistance is provided by the city.

All CHDO's, sub-recipients and all entities who administer HOME programs will follow recapture provisions that have been adopted by the City of Greenville. The City requires

the recapture of its HOME-funded homeownership housing assistance from net sales proceeds when the original homebuyer sells the property during the affordability period.

Net sales proceeds are the funds remaining from the sale of the property by the original homebuyer less the repayment of the outstanding balance on any superior mortgage, sales commission, the original homebuyer's down payment and the cost of any property improvements made by the original homebuyer. To the extent that net proceeds are available at closing, all of the HOME funds are due and payable. In the event of foreclosure, the Lender may not require the Borrower to repay an amount greater than the net proceeds available after the foreclosure sale. The recapture provision is enforced through execution of a Declaration of Deed Restrictions, which identifies the period of affordability, primary residency requirement, and term and conditions required when using the recapture provision.

Homebuyer assistance may be used for down payment 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 (15) period at 0% interest. If the property is disposed voluntary, involuntary or is in default, the percentage for repayment is based on the actual year.

Assistance provided to nonprofit agencies through the CDBG Program will be secured with a sub-recipient agreement/contract. Should the agency fail to comply with program rules, the assistance will be recaptured.

Recaptured HOME funds by Community Housing Development Organizations (CHDO), on behalf of City of Greenville, are not considered to be CHDO proceeds but shall be used by the CHDO's to provide affordable housing for City of Greenville residents.

Recaptured HOME funds provided by an agency other than a CHDO, will be recaptured by City of Greenville to be used for eligible HOME activities in accordance with the requirements of the HOME statute and regulations, in the same manner as program income.

The recapture provision will ensure that each HOME assisted unit will remain affordable for a period of time determined by the recapture schedule below, established in accordance with 24 CFR 92.254(a)(4):

HOME Funds Provided	Period of Affordability
Less than \$15,000	5 years

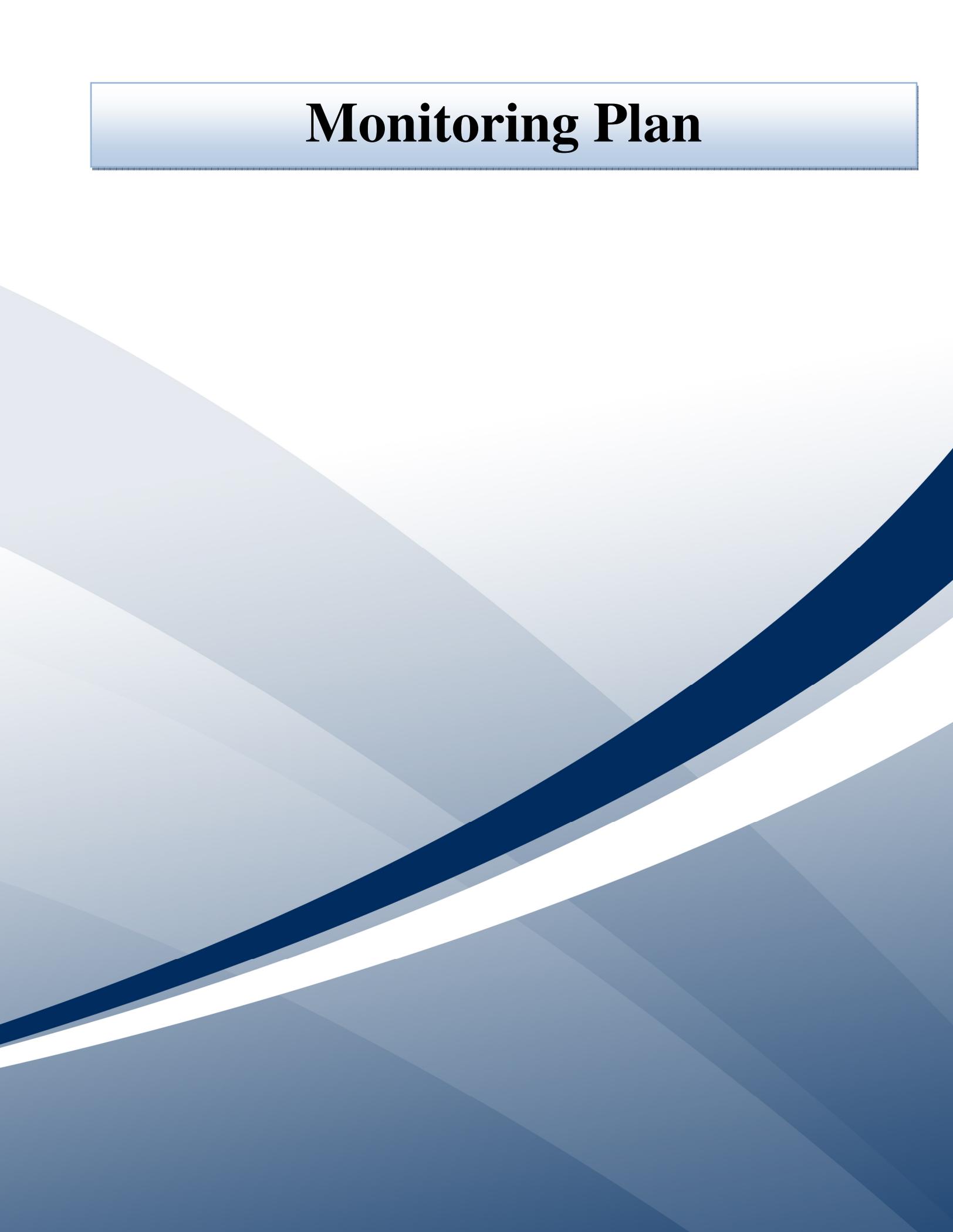
\$15,000 - \$40,000	10 years
More than \$40,000	15 years
New Construction	20 years

J. Section 3 Requirements

Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u) (Section 3) requires the Community Development Department to ensure that employment and other economic and business opportunities generated by the Department of Housing and Urban Development (HUD) Section 3 financial assistance, to the greatest extent feasible, are directed to public housing residents and other low-income persons, particularly recipients of government housing assistance, and business concerns that provide economic opportunities to low and very low income persons.

It is the policy of the Community Development Department of the City of Greenville to require its Contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment. See Section 3 Plan **Appendix I**.

Monitoring Plan



VI. MONITORING PLAN

City of Greenville will continue to improve its established monitoring system of CDBG, HOME and other housing and community development activities to ensure regulatory compliance. Monitoring is the responsibility of the City of Greenville Community Development Department Housing Division, to include but not limited to:

Monitoring Objective

Primary - To ensure that subrecipients are:

- Complying with all applicable federal requirements
- Complying with administrative and financial management standards
- Performing and delivering services in a timely manner

Secondary - To identify any potential areas of non-compliance and offer technical assistance.

Monitoring Procedure

- In-house reviews of subrecipient materials & regulations review
- Pre-monitoring visits with subrecipient
- Conduct visit as follow:
 - Notify of date, scope, focus of review
 - Hold entrance conference with chief official
 - Document, gather & analyze
 - Hold exit conference to report results, hear reaction & form conclusions
- Follow-up with letter of results to include findings and/or concerns.

On-Site Visits

Staff performs one (1) on-site monitoring review annually; depending on the assessment of risks for non-compliance, there may be additional monitoring tasks put in place. Program operations are observed, staff persons are interviewed, client eligibility is confirmed, financial and programmatic reports are verified.

Long-Term Compliance

Activities involving real property acquisition or improvement require long-term compliance with original purpose of the federal assistance. City of Greenville Community Development Department maintains a CDBG Real Property Inventory that is updated annually, and confirms that such property is still being used for the intended purpose. City also carries out an annual review of HOME-assisted rental units, to ensure compliance with Housing Quality Standards, tenant eligibility, and rent ceilings.

Rental Housing Monitoring

Staff must review annual Project Compliance Reports and perform regular on-site visits throughout the affordability period to ensure continued compliance with:

- Rent and occupancy requirements
- Property standards
- Other Federal requirements (fair housing, lead-based paint, affirmative marketing, etc.)

Community Housing and Development Organizations (CHDO's)

Active Funded CHDO's	Contact Person	1st Q	2nd Q	3rd Q	4th Q	Property Type
Metropolitan Housing Development Corporation	David Moore	3/9/2015	7/6/2015	10/5/2015	1/12/2016	Rental
Streets to Homes	Amanda Willet	3/9/2015	7/6/2015	10/5/2015	1/12/2016	Rental

HOME Downpayment Assistance

Annual Compliance Review (Affordability Period)	Contact Person	Annual Monitoring Visit
Verification of Recipient Compliance	In house- letters	8/31/2015

Quarterly Review Outstanding Projects

Consortium Members with Outstanding Projects	Contact Person	1st Q	2nd Q	3rd Q	4th Q	Property Type
Town of Grifton	Joe Albright	3/9/2015	7/6/2015	10/5/2015	1/12/2016 6	Lease/ Purchase
Greenville Housing and Development Corp.	Michael Best	3/9/2015	7/6/2015	10/5/2015	1/12/2016 6	Lease/ Purchase
Exceed Inc.	Carlton Gay	3/9/2015	7/6/2015	10/5/2015	1/12/2016 6	Lease/ Purchase

Annual Compliance Review

Annual Compliance Review (Affordability Period)	Contact Person	Annual Monitoring Visit
Town of Ayden	Sherri Scharf	6/30/2015
Town of Farmville	Theresa L. Cieslinski	6/30/2015
Pitt County	Jonas Hill	6/30/2015
Town of Grifton	Joe Albright	6/30/2015

Community Development Block Grant (CDBG) Subrecipient

2014-2015 Monitoring Schedule

Active Subrecipient	Contact Person	Monitoring Visit Dates	Activity
Literacy Volunteers of America Pitt County	Allen Spicer	4/14/2015 and 8/18/2015	Provide literacy classes and career readiness skills and workforce training to adults.
Boys & Girls Clubs of the Coastal Plain	Misty Marston	4/14/2015 and 8/18/2015	Operate the Club Academy Program (Jarvis location), a comprehensive academic success program designed to help youth excel academically.
ECU/LWG Intergenerational Community Center	Deborah Moody	4/16/2015 and 8/20/2015	Provide assistance with transportation and admission costs associated with planned trips for the Lucille W. Gorham Intergenerational Community Center Youth Development Programs.
Center for Family Violence Prevention	Diana Cooper-Mann	4/21/2015 and 8/25/2015	Continue the Systematic Training for Effective Parenting (STEP) Program, Triple P, counseling, case management and Kidz Clubhouse for families impacted by domestic violence.
L.I.F.E. of NC (STRIVE)	Joyce Jones	4/23/2015 and 8/27/2015	Provide employment, workforce education, training, and CRC (Career Readiness Certificate) certification to criminal offenders reentering society.

Homelessness



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 2012 Continuum of Care Homeless Population Point in Time Survey revealed that there are one hundred six (106) homeless persons in Pitt County. Currently, Pitt County has one hundred (100) emergency beds and twenty-eight (28) transitional housing units available to serve them.

During the upcoming 2014-2015 fiscal year, the group will continue to develop the Continuum and prepare various grant applications for submission to the NC Balance of State. 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.

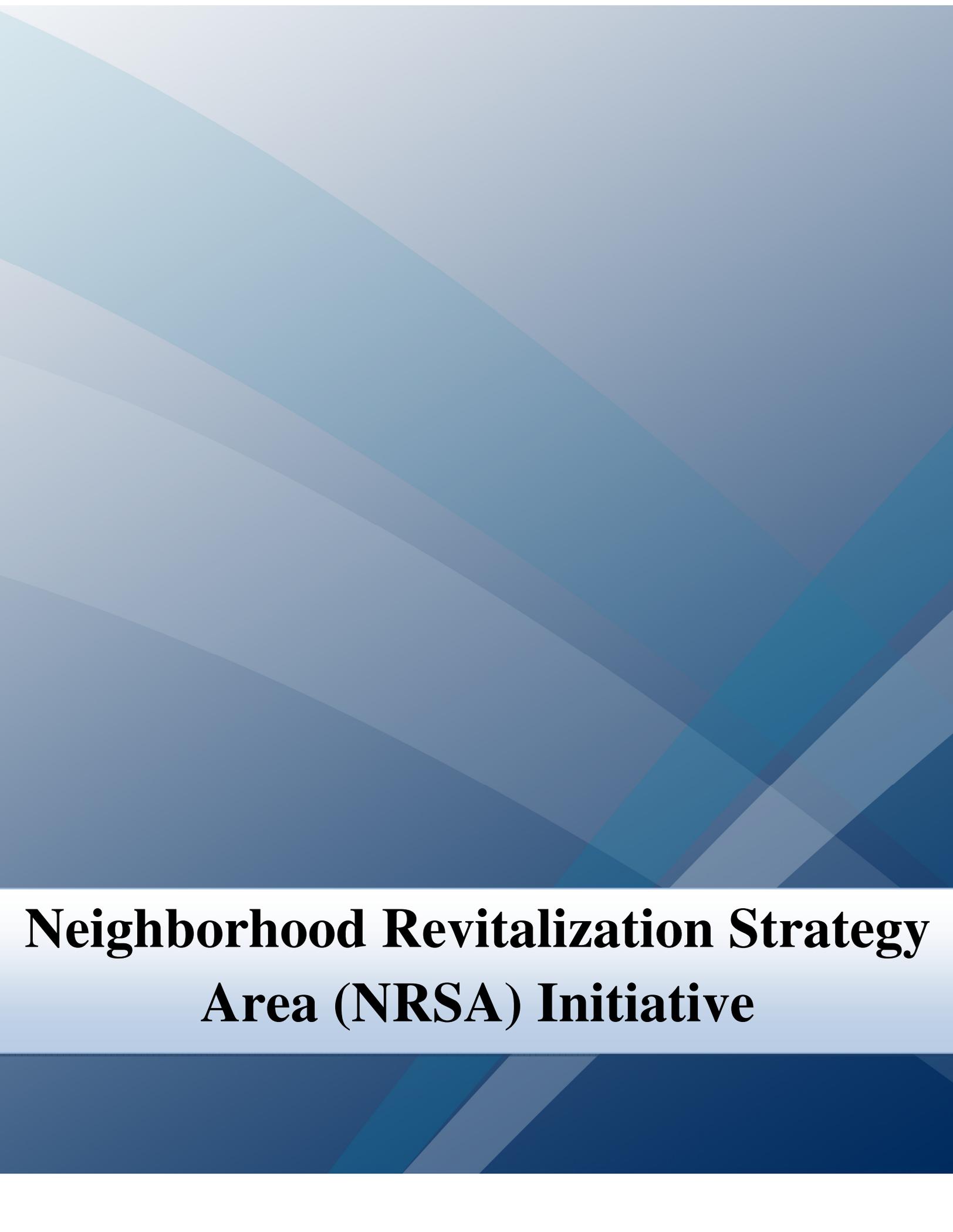
GOAL 2

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 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 2012, the CDBG program funded SSI/SSDI Outreach, Access, and Recovery (SOAR) Training, which strived to increase disability benefits for homeless people and those at risk of homelessness who are living with disabilities; and a “Project Connect” event. The Project Homeless Connect event had a one day event which provided community and medical services in one (1) location for homeless residents. In fiscal year 2014-2015, the City will seek to assist those agencies who provide the homeless with housing, economic opportunities, and education opportunities.



**Neighborhood Revitalization Strategy
Area (NRSA) Initiative**

Introduction

The West Greenville Area is located in the urban core of Greenville, North Carolina. It is an area that for many years has been overcome by poverty, but in recent years has begun to show signs of improvement. This improvement is due in part to the City's revitalization efforts over the past eight (8) years. The City wishes to continue its efforts within this area; however, additional tools are needed to ensure that the neighborhood dynamics improve in an orderly manner. Therefore, the City of Greenville wishes to establish a Neighborhood Revitalization Strategy Area (NRSA). The proposed NRSA will be located between the two (2) largest economic drivers in Greenville - East Carolina University and Vidant Medical Center. West Greenville is an area that has witnessed a significant amount of decay over the years with dilapidated and substandard homes checkered throughout the area. The proposed NRSA would cover an area in which the City has tried to target over the past eight (8) years. In fact, it would nearly triple the coverage of the past target area.

While developing this area, partnerships have been forged with the State Employees Credit Union, Community Housing Development Organizations (CHDOs), Pitt Community College, East Carolina University, neighborhood organizations, and other non-profits in order to address some of the issues plaguing the community. The City intends to continue these partnerships, and expand upon them as opportunities arise.

The community determined that the West Greenville Area is a strategic place for neighborhood growth and development. The community and staff came to this conclusion through numerous public participation sessions. These sessions resulted in numerous documents and plans. In addition, the public comments resulted in strategic goals placed into the 2013-2018 Consolidated Plan – which in turn translate to each of the related Annual Action Plans. An example of a plan and document is certified redevelopment area and the streetscape master plan. The Consolidated Plan and Annual Action Plan further emphasizes detailed objectives and performance measures for improving the West Greenville Area.

In recent years, the West Greenville Area has undergone positive changes. Also, there are plans to continue the work. There are several large projects that are slated for implementation in the upcoming years that will provide a positive impact for the area. For example, the “10th Street Connector” - is a project connecting US Highway 264 to the center of Greenville. This project will serve as a catalyst for public and private investment along the aforementioned corridor. This corridor will serve as a new major transportation route that will bisect the proposed NRSA. In addition to the 10th Street Connector Project, the City of Greenville is implementing a greenway initiative which extends the current greenway through the northern portion of the proposed NRSA. A greenway gives the low/moderate income residents of the area access to recreational opportunities and community events that are hosted in the Center City throughout the year.

The City of Greenville will employ the use of four (4) basic neighborhood development strategies. These strategies will help staff better serve the community and the proposed West Greenville NRSA by setting benchmarks for improvement through various community development strategies. These strategies are as follows:

1. Community Building: harnessing existing networks of social capital
2. Place-Based: focusing on the community's physical resources
3. Business-Oriented: seeking to improve the neighborhood business climate
4. Workforce Development: providing local residents with basic skills

In addition to the neighborhood development strategies, there are goals and objectives that should be accomplished. The goals for the proposed West Greenville NRSA can be broken down into five (5) categories that will be addressed throughout the NRSA application. These goals were determined to be ideal for West Greenville through public participation and what the community thought was required for it to become a thriving area in the future. These goals are as follows:

1. Preserve the historic nature and character of the neighborhood
2. Continue and create programs that produce affordable housing
3. Empowering the neighborhood through economic growth
4. Ensure the neighborhood will be able to sustain itself over the next 20-50 years
5. Provide recreational opportunities throughout the neighborhood

Designating West Greenville as a Neighborhood Revitalization Strategy Area allows the area to be specifically targeted for development opportunities and community projects. The designation will assist in the advancement of the area, its residents, and the community as a whole. Current and future CDBG funds will be maximized in this area in a variety of ways including, but not limited to, residential, commercial, and infrastructure improvements.

Benefits of a Neighborhood Revitalization Strategy Area

1. **Job Creation/Retention as Low/Moderate Income Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the incomes of persons that take or are considered for such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i));
2. **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy can be considered to be part of a single structure for the purposes of applying the low-and-moderate income national objective criteria. This provides a greater flexibility to carry out housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii));
3. **Aggregate Public Benefit Standard Exemption:** Economic Development activities carried out under the strategy may, at the grantee's option, be exempt from aggregate public benefit standards, this increasing a grantee's flexibility for program design as well as reducing record-keeping requirements related to the public benefit standard (24 CFR 570.209(b)(2)(v)(L) and (M); and
4. **Public Service Cap Exemption:** Public services carried out pursuant to the strategy by a Community Based Development Organization (CBDO) are exempt from the 15% public service cap (24 CFR 570.204(b)(2)(ii))

Additional Benefits:

- CDBG funds can be used to rehab single-family homes serving a commercial purpose
- CDBG funds can be used to rehab a business.
- Reduced record-keeping requirements once you meet 51% benefit to low/moderate income individuals
- Community Housing Development Organization (CHDO) can also be a Community Based Development Organization (CDBO) if it meets the national objectives (see below).

HUD National Objectives:

Section 104(b)(3) of the Housing and Community Development Act of 1974 states that one of three national objectives must be met for activities using CDBG funds. Those objectives are identified as:

1. Benefitting Low and Moderate Income Persons;
2. Preventing or Eliminating Slums or Blight;
3. Meeting Urgent Needs

The document that follows will serve as an amendment to our current 2013-2018 Consolidated Plan and contains information on the West Greenville area as it pertains to the NRSA requirements. Included will be NRSA boundaries, demographic information, our consultation and implementation process, economic empowerment strategies, and performance measures. Highlighted in the following document will be information on the NRSA and statistical data supporting the region being designated as an NRSA. Primary sources for the data include the US Department of Housing and Urban Development, US Census Bureau, and American Community Survey. The data compiled was a culmination of current and past information including a 5 year American Community Survey estimates based on US Census Bureau data.

Relevant graphs, tables, and maps will be included in the proposal to illustrate pertinent information about the West Greenville NRSA.

Boundaries

The West Greenville NRSA is a 667.58 acre area (including streets and right of ways) located next to downtown Greenville, East Carolina University area, and the Medical Center. The current land use within the proposed boundary is 510.91 acres of residential, industrial, and commercial units, with 84% being residential (Figure 1). The NRSA is comprised of portions of three (3) qualifying census tracts (7.01, 7.02, and 1) which will overlap the entire West Greenville Redevelopment Area.



Figure 1- Land use breakdown

	Land Use	# of Acres	# of Units	# of Parcels	Notes
Residential Categories	Single-Family	160.02	1,102	1,004	Some Parcels contain multiple Single-Family Houses
	Duplex	29.63	416	190	Some Parcels contain multiple Duplexes
	Multi-Family	18.75	398	20	First St Place, GHA, etc
Non-Residential Categories	Cemetery	5.87	0	1	Cherry Hill Cemetery
	City of Greenville Vacant	14.32	0	100	COG Parcels where houses will be constructed
	Pitt County Tax Foreclosures	1.22	13	13	Homes currently owned by Pitt County
	Potential Comm. Redevelopment	3.46	19	19	Commercially Zoned - contains Buildings currently being leased as Churches
	Vacant Parcels	92.31	0	428	Vacant Properties (all vacant properties except what is mentioned in other categories)
	Commercial	65.75	187	144	Existing Commercial Businesses
	Industrial	20.84	29	35	Warehouses / Storage
	Institutional	77.40	77	70	Government, Churches, and Privately Owned Parcels being used as Institutional uses
	Utilities	15.00	0	6	Land currently being used for Utilities
Office	6.34	22	22	Attorneys, Accountants, Insurance, etc	
Totals		510.91	2,263	2,052	

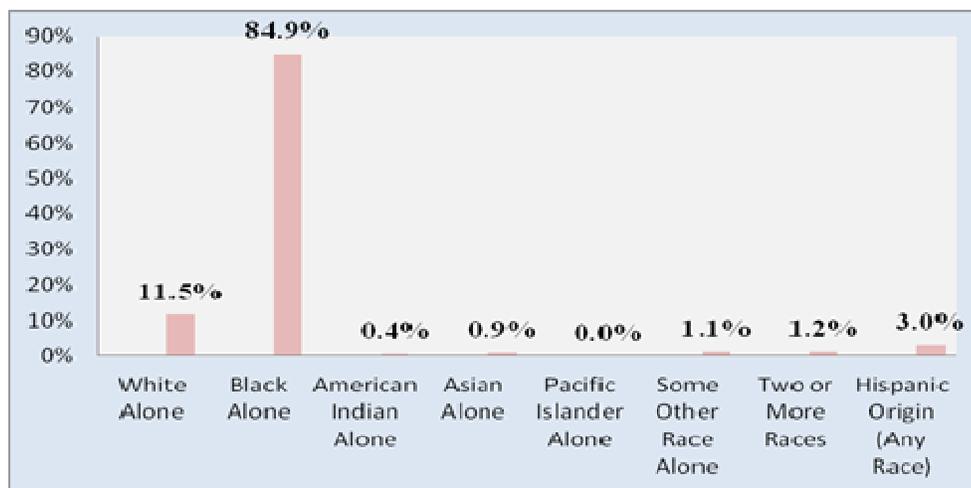
Demographic Criteria

Listed below are the demographics of the West Greenville NRSA and the qualifying census tracts that make up the entire NRSA region.

Figure 1.1- Ethnic Breakdown

West Greenville NRSA Ethnic Breakdown		
White Alone	434	11.5%
Black Alone	3,212	84.9%
American Indian Alone	16	0.4%
Asian Alone	34	0.9%
Pacific Islander Alone	0	0.0%
Some Other Race Alone	41	1.1%
Two or More Races	46	1.2%
Hispanic Origin (Any Race)	113	3.0%

*2010 US Census Bureau



The West Greenville NRSA is populated predominantly by Black/African-American households with 84.9% of its residents identifying on census bureau data as Black/African-American. The next highest percentage is white citizens who make up 11.5%, or 434 residents, of the West Greenville NRSA.

Figure 2- Demographic Breakdown

HUD Income Limits

Pitt County, NC

Median	Income Category	1	2	3	4	5	6	7	8
\$55,200	Extremely Low (30%)	\$11,670	\$15,730	\$19,790	\$23,850	\$27,910	\$31,970	\$34,250	\$36,450
	Very Low(50%)	\$19,350	\$22,100	\$24,850	\$27,600	\$29,850	\$32,050	\$34,250	\$36,450
	Low(80%)	\$30,950	\$35,350	\$39,750	\$44,150	\$47,700	\$51,250	\$54,750	\$58,300

***2014 HUD Income Limits**

Demographic Information	Qualifying census tracts			City
	7.01	7.02	1	Greenville
Median Household Income	\$18,856	\$25,092	\$15,229	\$34,399
Total households	1,782	1,001	1,946	34,167
Percentage earning < \$35,000	77%	73%	78%	50%
Unemployment rate	14.50%	16.20%	9.30%	12.30%
Percentage 65 yrs and older	24.60%	38.30%	29.90%	9.50%

* 2008-2012 ACS Data, 5 year estimate

Methodology

A local government is only eligible to submit an NRSA application for approval to the U.S. Department of Housing and Urban Development if it meets specific criteria. These criteria are as follows:

1. The areas covered under the NRSA must be contiguous to each other; there cannot be checker board areas across the community.
2. The selected area must be primarily residential.
3. The area must contain must contain a high percentage of LMI households – three (3) options.
 - 70% of the total population of the selected area, or
 - Upper quartile percentage greater than 51% and less than 70% LMI, or
 - 51% of total population if the upper quartile is less than 51%

The information and data gathered for our assessment were derived from various government websites such as U.S. Department of Housing and Urban Development, US Census Bureau, and American Community Surveys. West Greenville is an area with concentrated poverty and has 76.5% of the households falling below the low-moderate income threshold. The City decided to use the households that earn less than \$35,000 dollars annually as the threshold for determining the eligibility. The eligibility was based on the “70% of the total population of the selected area” rule. The fact that the City of Greenville met the requirements using this methodology further demonstrates the need of an NRSA in the West Greenville area. According to the 2014 HUD Income Limits for Greenville, North Carolina, the 80% threshold for moderate income households are categorized into the \$44,150 bracket. Therefore, the proposed NRSA has a much higher percentage of households in poverty than 76.5%.

Due to the high concentration of low-moderate income households in the area, West Greenville is an ideal location for economic empowerment activities and programs. Utilizing the public benefit standard and public service cap exemptions included within the NRSA will allow the City to address these issues specifically.

Consultation and Process

The City of Greenville has a well-defined public participation process. City staff is committed to educating and informing the residents of West Greenville on every step taken in the NRSA process. Therefore, the City will involve the community in the NRSA process from beginning to end.

The City will hold multiple meetings comprised of various stakeholders. These stakeholders include the residents of Greenville and the NRSA, City Council, State Employees Credit Union, our Community Housing and Development Organization, the Affordable Housing Loan Committee, the Redevelopment Commission, and various departments within our local government. The City of Greenville plans to implement a minimum of two (2) neighborhood meetings with the residents of West Greenville as well as hosting an open house. While the NRSA is being implemented, it is important to the City to keep the residents of the neighborhood informed of each step of the process.

The City of Greenville has a Neighborhood Advisory Board which is a citizen-led board that handles city-wide neighborhood issues. The Neighborhood Advisory Board presents neighborhood issues directly to the Greenville City Council and disseminates information to the residents and neighborhood associations. The Neighborhood Advisory Board works directly with residents to understand issues in greater detail, brings residents together to share information, and helps establish new neighborhood associations. This Neighborhood Advisory Board will serve as a means for residents of the West Greenville area to voice their concerns in regards to the NRSA directly to the Greenville City Council.

Process

The City of Greenville will submit the NRSA proposal to HUD for preliminary approval. Staff has been in contact with the HUD field office, and they have advised that a preliminary review of the proposal was a good idea. During the preliminary review process, the City of Greenville will host multiple meetings with stakeholders. The City will hold meetings with the residents of the neighborhood and the community as a whole as described in the schedule below. The Affordable Housing Loan Committee and the Redevelopment Commission are both being consulted and informed of the NRSA process. In addition, they will be updated on the goals and objectives described in the 2015-2016 Annual Action Plan. The dates for these meetings currently are proposed as follows:

- December 19, 2014: Submit NRSA Proposal to HUD for Preliminary Review
- January 20, 2015: Open House – Greenville City Hall: 6:00pm-7:15pm
- January 27, 2015: First Community Meeting – Carver Branch Library: 6:00pm-7:15pm
- February 4, 2015: Second Community Meeting- Sheppard Library: 6:00pm-7:15pm

- March 3, 2015: Redevelopment Commission Meeting
- March 11, 2015: Affordable Housing Loan Committee Meeting
- March 19, 2015: Submit NRSA to City Council
- March 20, 2015: Submit NRSA to HUD (if City Council approves)

These meetings will help the City of Greenville determine how, where, and why the proposed NRSA will be implemented.

Community input is a vital aspect of the NRSA process and every measure is being taken to maximize this. The West Greenville community is a large stakeholder group in this process and involving them remains one of the primary goals of our consultation process. Residents of the proposed NRSA, as well as residents from other communities, are encouraged to attend these community meetings due to its significance. An NRSA designation will bring about vast changes to West Greenville and for that reason consenting local businesses, organizations, and community meeting places were utilized as a means to inform the public.

The open house and community meetings were advertised in a local newspaper and on the City of Greenville website. In order to further inform the public, flyers were placed throughout the proposed area at local businesses, schools, libraries, and churches. In addition, a group of volunteers went door-to-door in the West Greenville area and handed flyers directly to area residents. A total of 500 flyers were distributed throughout the proposed NRSA informing the residents not only of the time, date, and location of the NRSA community meetings, but the City of Greenville's Annual Action Plan meeting as well.

Community Meetings Feedback

Open House

Residents and members of the City Council were present at the Open House meeting that took place on January 20, 2015 in City Hall. Members of the Housing Division engaged with the attendees and handled inquiries into the NRSA process as well as the programs that will be offered. Representatives from local media outlets were also present and photographed and recorded the attendees and their interactions with the Housing Division staff. Multiple displays were used to illustrate the proposed NRSA boundaries, the West Greenville Redevelopment Area, and our current programs. Comments received during the Open House were positive with many of the attendees expressing interest and optimism about the proposed NRSA.

Carver Branch Library

City staff conducted the first community meeting at Carver Branch Library. Carver Library lies in the heart of the proposed NRSA. This library provides educational and internet access to the

vast majority of the area. Due to the central location of the library, staff routinely uses its meeting space for community meetings.

The first community meeting was not well attended. This meeting only had three (3) people present. However, the conversations and discussions which came from the meeting were very helpful. For example, two (2) of the three (3) attendees were longtime residents of the area. Moreover, both residents are just above 80% AMI. They were very excited that the NRSA would allow for CDBG funds to be spent on those that were above 80% AMI but still need help sustaining their living environments. They both expressed interest in owner-occupied home rehabilitation.

There were additional comments made at the meeting. They are as follows:

1. Lighting is an issue in the neighborhood.
2. There seems to be several boarding homes in the neighborhood. Is this legal?
3. More sidewalks would be a good thing.
4. There needs to be jobs within the neighborhood (commercial retail).
5. Safety concerns seem to be decreasing along with unwanted foot traffic.

Sheppard Memorial Library

City staff conducted the second community meeting at Sheppard Memorial Library. Sheppard Memorial Library lies in the heart of Greenville's Center City. This library provides educational and internet access to a wide array of community members. Due to the central location of the library, staff routinely uses its meeting space for community meetings.

The second community meeting was not well attended; however, there were more people there than the first meeting. In addition, there were multiple media sources present at the meeting. The local newspaper, The Daily Reflector was present along with WNCT-TV staff. The meeting had three (3) non-media people present. Just as the first meeting, the conversations and discussions which came from the meeting were very helpful. For example, two (2) of the three (3) attendees were longtime residents of the area. These residents (married couple) were just above 80% AMI. They were also very excited that the NRSA would allow for CDBG funds to be spent on those that are above 80% AMI but still need help sustaining their living environments. They both expressed interest in owner-occupied home rehabilitation. Moreover, these were different community members than the first meeting.

There were additional comments made at the meeting. They are as follows:

1. Transportation is not as frequent as the community would like.
2. Additional covered bus stops are necessary.
3. They appreciated the demolition of the blighted structures.

4. Please rehab historic structures when it is feasible.

Municipal Benchmarks

NRSA BENCHMARKS: SIZE

CITY	SIZE
Durham, NC	125 acres
Asheville, NC	Not Available
High Point, NC	141.2 acres
Winston Salem, NC	12,800 acres
Greenville, NC	510 acres

Durham, North Carolina

The City of Durham implemented an NRSA in the Southside neighborhood of Durham in FY2012. While this area is smaller in size than Greenville's NRSA, the area contains roughly the same amount of households as the West Greenville area. The Southside neighborhood NRSA showed the City of Greenville the importance of creating outside partnerships with organizations to address community issues. Durham Community Self-Help was a large partner in the development and redevelopment of the Southside area having demolished 85 homes to be reconstructed as for-sale housing units for qualifying homeowners. In addition to the community organizations, Durham acquired a large developer, McCormack Baron Salazar (MBS), to lead their development efforts. This community based development organization (CBDO) was the foundation for redevelopment of the Southside area and showed the City of Greenville the importance of a qualified developer in the NRSA process. The City of Durham utilized monthly Steering Committee meetings to discuss the timeline and agenda-setting for the redevelopment of the Southside neighborhood. These meetings were comprised of residents of the neighborhood, area churches, civic leaders, and representatives of the Durham Housing Authority, Duke University, and North Carolina Central University. These Steering Committee meetings showed the City of Greenville the importance of stakeholders in the consultation process and the efforts that must be made in order to involve and inform them.

Asheville, North Carolina

The City of Asheville implemented an NRSA in the West Riverside neighborhood of Asheville in FY2007. This area was a particularly crime-riddled area and was the focus of a federal grant

under the Weed & Seed program. Due to the federal grant, the City of Asheville was able to address many of the factors that contributed to the decay of the neighborhood. The pairing of the NRSA with the federal grant showed the value of an NRSA designation, as well as the overall benefit of combining this designation with a new or existing program. The City of Asheville utilized the local police department to help address the issues of crime and disorder in the neighborhood. From the collaboration between the City of Asheville and law enforcement, great improvements were made in the neighborhood and surrounding areas which serve as an ideal example for the City of Greenville. Asheville implemented many different programs and initiatives that focus on the residents of the community, most important to the City of Greenville being the Asheville Parks and Recreation and YMCA collaboration. The City of Asheville put in place programs to bring youth sports programs to the residents of the West Riverside neighborhood and the City of Greenville may consider in the future similar recreational opportunities for the residents of West Greenville.

High Point, North Carolina

The City of High Point implemented an NRSA in the Southside neighborhood of their city in FY2006. From the NRSA designation in High Point, the City of Greenville referred to the methods used to retain the historical homes in the neighborhood. The Southside neighborhood in High Point was a historically Black/African-American neighborhood, much like the West Greenville neighborhood. The City of High Point implemented housing initiatives to maintain the historic nature and character of the neighborhood while providing needed improvements to make it an attractive and viable community. The City of Greenville referred to these benchmarks for historic home retention, rehabilitation, and new construction (as needed) to formulate an approach to the West Greenville neighborhood.

Winston Salem, North Carolina

The City of Winston Salem implemented an NRSA in FY2008 over a large portion of their city. The area in Winston Salem had a large amount of distressed homes, public housing, and other properties throughout the city. Winston Salem implemented an NRSA building rehab program that is intended to increase private sector investment in the area. The City of Greenville has referred to this as a benchmark for the benefits it will have to the West Greenville neighborhood. Increased private sector involvement will bring additional revenue to the area and help create an economically sustainable community. Additionally, the City of Winston-Salem concentrated its efforts on enforcing codes within the NRSA to abate nuisance properties and remove threats to public health and safety. These measures will be taken by the City of Greenville to accomplish similar goals with the hope of being more proactive in efforts to maintain quality housing. The City of Winston Salem has implemented a Capital Improvement Plan for the NRSA in particular with emphasis on streetscape improvements throughout the area. Improved infrastructure will not

only improve the safety of the area but will also attract new residents if the area is viewed as attractive. Similar plans have been developed for the West Greenville neighborhood with the intention of attracting new residents and improving the safety and appeal of the neighborhood.

Housing Assessment

The 2010 US Census data describes that the City of Greenville had 36,071 occupied housing units with the majority being rental units and only 37% (13,381 units) being owner-occupied. Significant problems exist within the housing availability in Greenville as well as within the West Greenville NRSA. Homes in Greenville are aging at a faster rate than homes are being built, and the amount of available affordable housing is becoming increasingly limited.

The West Greenville NRSA has a total population of 3,390 residents with 1,717 total housing units and 1,455 total households based on American Community Survey five-year estimates. In the NRSA, a total of 1,420 housing units were built in 1979 or earlier, with 144 having been built in 1939 or earlier. Of these 1,455 housing units, 410 homes are considered owner-occupied dwellings (Figure 2.1). In keeping true to the City of Greenville's first goal, we will attempt to preserve as many of these historic homes as possible. In many of the older homes, some of which are contributing historical homes, the likelihood of facing lead-based paint hazards increases (Figure 3 below).

Figure 2.1 Overall Rental vs. Owner for all Residential Properties within the NRSA

Occupancy Status	# Parcels	Acres	# of Units	% based on Acres	% based on # of Units
Owner Occupied	410	69.46	461	33.33%	26.85%
Rental	803	138.94	1,256	66.67%	73.15%
Totals	1,213	208.40	1,717	100.00%	100.00%

The majority of the proposed West Greenville NRSA is zoned R6-S, which designates the area as a residential single-family district – meaning each parcel must have at least 6000 square feet for lot size. Although the current zoning designates an area for 6000 square foot lots, the existing homes and the historic nature of the neighborhood results in some of the parcels falling outside of the current dimensional standards. These lots are considered non-conforming lots. Many of the parcels are 4800 square feet or less. This makes redevelopment challenging, but the City is researching ways to allow historic homes to be rebuilt on non-conforming parcels.

The economic and demographic factors of the area lead to several prevalent issues associated with the housing stock internal to the NRSA. Many of the homes are dilapidated or deteriorating due to the costs associated with maintaining a historical home and the high percentage of low-income residents and elderly residents living on fixed incomes. A majority of the homes in the area are renter-occupied and, for that reason, the homes often do not receive repairs to properly maintain them. The City has implemented several programs to address the issues with the housing stock in the area. For example, the City has an owner-occupied home rehabilitation program. This program also serves as a tool to preserve historic homes.

The City intends to preserve the historic nature of the area by constructing new homes that fit the character of the neighborhood – craftsman, bungalow-style homes. In fact, the City has constructed thirteen (13) new homes within the area. In order to increase homeownership and give residents access to new construction, the City has implemented three (3) different types of down payment assistance for prospective LMI homeowners.

Even though there are multiple homeownership programs, the number of owner-occupied residents pales in comparison to the amount of renter-occupied homes within the NRSA. An option that may be useful is a rental rehabilitation program. However, there are many challenges with creating such a program.

New Construction

In an attempt to address the barriers to developing affordable housing, the City of Greenville continues to create single-family affordable housing opportunities. These opportunities are provided through vacant/dilapidated properties purchased by the City with local public bond funds. Upon acquisition and installation of infrastructure, the City then makes lots available to nonprofit and for-profit agencies for development. In some cases, the City acts as the developer and bids out the new construction to local contractors.

All development proposals are accepted based on a reasonable price per square foot and the developer's ability to meet building specifications as required by a Request for Proposal. As a direct result of the City's purchase of the land and the infrastructure improvements, the lots become more affordable, therefore reducing the cost to the homebuyer. As lots are sold to eligible homebuyers, the funds for the lot cost are sometimes recaptured and used to fund future developments.

Providing affordable housing has been a primary focus for the City of Greenville in the West Greenville area. Since 2011, the City of Greenville has constructed nine (9) new homes on Douglas Avenue. Each new home is currently occupied by new homeowners or renters. In addition, construction is currently underway on another home on Douglas Avenue that will bring the new construction total to 10 new homes. Each one of these homes is benefitting low-income households. In addition to the progress being made on the Douglas Avenue corridor, other areas of West Greenville are beginning to display signs of redevelopment. For example Lincoln Park, a neighborhood located within the proposed NRSA boundaries, currently has 16 lots available with new construction beginning on two (2) of these lots in early 2015.

New construction in the West Greenville area will serve as a primary benefit of the proposed West Greenville NRSA - if approved. Approval of an NRSA will result in the aggregation of housing units benefitting a “mixed level” of incomes; however, the aggregation will primarily benefit low-moderate income households per HUD requirements. The City

believes that mixed income neighborhoods are able to become more sustainable and provide a more diverse environment.

Owner-Occupied Rehabilitation Program

The City offers grants/loans that assist and encourage preservation of the older housing stock. Home rehabilitation supports homeowners who strive to bring their properties up to today's building standards, and ensures the health, safety, and general welfare of the community. The grant/loans are based on income limits that are provided by the U.S. Department of Housing and Urban Development. A percentage of the total cost of the work applied can either be forgiven or decreased based upon an applicant's gross income and family size.

The City of Greenville has offered the owner-occupied home rehabilitation program since the mid 1970's. This program has been significantly successful in keeping low-moderate income families in homes that are safe, healthy, affordable, and energy efficient. Recently, staff has also noticed an additional benefit of this program – it also has the ability to preserve the historic character of a neighborhood.

In FY 2013-2014, \$370,158 in CDBG and \$200,815 of HOME funds were set aside to rehabilitate single-family homes. During this time, a total of seventeen (17) units were completed utilizing past years funding and current year funding. A vast majority of these units are located within the proposed NRSA boundary and benefit its low-moderate income residents. Currently, rehabilitation efforts are underway on a historic, two-story, four bedroom home within the proposed boundary. There are two (2) eligible historic districts within the proposed boundary. Approval of an NRSA will allow greater flexibility in helping those who live in historic homes. It has been staff's experience that many of the residents that live in historic homes are above 80% AMI. Therefore, it is a challenge to help those people maintain and repair those historic structures.

West Greenville and University Area Downpayment Assistance Program

This program offered by the City of Greenville provides a Homebuyer Assistance Grant within two (2) specific areas - West Greenville and the University Area. The grant provides flexible gap financing and closing costs associated with the purchase of a qualified property. An eligible applicant can potentially receive five percent (5%) of the total sales price of the home or up to \$10,000 in assistance. Borrowers are not tied to a percentage of AMI with this program. The assistance is secured with a 10-year soft second mortgage at zero percent (0%) interest with no payment required unless the house is sold, leased, or rented out.

In addition, the assistance is forgiven one tenth (1/10) per year, and after ten (10) years, is the grant is forgiven in its entirety. The deed of trust will be released at the end of the term.

However, if the owner sells, leases, or rents the property, the owner is required to pay back the assistance pro-rata. This program requires the applicant to have a \$1,000 out-of-pocket commitment.

HOME Downpayment Assistance Program

This program offered by the City of Greenville is designed to assist low to moderate income, first-time homebuyers with downpayment assistance to purchase a home within the incorporated city limits of Greenville. Funds can be used for the purchase of a single-family dwelling, condominium, or townhome city-wide. This program offers No Interest Forgivable Loan of up to 20% of the sales price of the home with a cap of \$20,000.00. These funds may be available to qualified homebuyers meeting the program guidelines. The funds for this program vary from year to year and are based on the HUD allocation to the city. This program requires the applicant to have a \$1,000 out-of-pocket commitment.

Affordable Housing 10% Loan Assistance Program

This program offered by the City of Greenville is designed to assist low to moderate income, first-time homebuyers with downpayment and closing costs. Loans of up to 10% of the sales price of the home may be available to qualified borrowers who meet the requirements for this program. For example, borrowers must be able to qualify for a loan and can be at 120% of AMI. This assistance program only allows the maximum sales price of the home to be \$150,000 and the funds are forgiven over 120 payments and are at zero percent (0%) interest.

The buyer must complete a homeownership education program, pre-qualify with a mortgage lender, and must occupy this dwelling as their principal residence. This program requires the applicant to have a \$1,000 out-of-pocket commitment.

Optional Rental Rehab Program

According to ACS survey data, the West Greenville area has a total of 410 owner-occupied housing units and 1,045 renter-occupied housing units. Due to the high number of renter-occupied units in the area, the City of Greenville is considering a new optional Rental-Rehabilitation Program. This program will support local property owners in maintaining sufficient housing for prospective tenants. Having a program that targets rental units will ensure that all residents of the neighborhood have access to adequate housing instead of only home owners. Therefore, staff will continue to research rental rehabilitation best practices across the state of North Carolina.

Figure 3 - Housing Units by Year Built

West Greenville NRSA		
Housing Units by Year Built		Percent
Total	1,910	100.0%
2010 or later	24	1.3%
2000-2009	168	8.8%
1990-1999	162	8.5%
1980-1989	136	7.1%
1970-1979	395	20.7%
1960-1969	335	17.5%
1950-1959	364	19.1%
1940-1949	182	9.5%
1939 or earlier	144	7.5%
* Lead-based paint concerns in highlighted area		

Institutional Infrastructure Assessment

There are vital elements of community infrastructure within the West Greenville NRSA. These elements have the potential to help the redevelopment efforts in the West Greenville area. These elements of community infrastructure are:

- Eppes Recreation Center
- Carver Library
- Lucille Gorham Intergenerational Center
- Sadie Saulter Elementary School
- West Greenville Police Substation
- Third Street Community Center
- Dream Park
- Community Gardens System

In addition to the existing institutional infrastructure in the proposed NRSA, the City of Greenville has begun updating roads and street lights in focus areas throughout the proposed NRSA. Road improvement projects have been implemented on West Fifth Street, and there are future plans for continued improvement. The West Fifth Street Gateway Project won an award from the NC Chapter of the American Planning Association for infrastructure improvements in the form of new sidewalks, bus shelters, and pedestrian walkways along a four block area of the NRSA. The City of Greenville wants to ensure that these vital infrastructure projects will enhance the streetscape of the neighborhood.

The development and/or rehabilitation of these community infrastructure elements will help re-establish West Greenville as a vibrant residential community. The continued maintenance and implementation of new infrastructure will assist in the attraction of new commercial development throughout the area. Future plans for infrastructure development are centered on the goals that the City of Greenville has for the proposed NRSA and its residents: They are as follows:

Future Infrastructure Projects

West Fifth Street Corridor (Phase II)

The city is preparing Phase II of the West Fifth Street Streetscape Project. This project will further improve on roads, pedestrian walkways, and public utility improvements along a four (4) block section of West Fifth Street. The City of Greenville has plans to facilitate development along the West Fifth Street corridor. This corridor extends through the West Greenville Redevelopment Area to the Center City Revitalization Area.

Workforce Center

The City plans to partner with multiple agencies and organizations to rehabilitate an old commercial structure to provide the local workforce with a place to develop their skills. The planned facility is located along West Fifth Street. The City is planning for the facility to provide business incubation, workforce education, and training for not only those who live in the neighborhood, but the community as a whole.

Greenville Transportation Activity Center (GTAC)

The City of Greenville plans to implement transit oriented development in the proposed West Greenville NRSA. This development will spur from a planned transit access point. The City has been fortunate to receive federal funding to establish a transportation hub. This hub will reside in between the Center City Revitalization Area and West Greenville Redevelopment Area. Having access to transit oriented development will empower the residents of the area who can use the resource as a means to seek employment or educational opportunities.

Grocery Store

One of the primary focuses for the City of Greenville's proposed NRSA is to successfully recruit and facilitate an environment for a grocery store. Currently the proposed NRSA has several corner stores and shops, but lacks a neighborhood grocery store for its residents. The area has also been designated as a food desert. The City of Greenville has acquired parcels of land along West Fifth Street with the intention of attracting a grocery store to the area. Subsequent to

the City's commitment for placing a grocery store along West Fifth Street, a local developer is constructing a commercial center with a grocery store. The store is within close proximity to the food desert.

Economic Empowerment

In order to facilitate and sustain the growth and development of the West Greenville area, the City of Greenville plans to implement economic empowerment strategies that specifically target the area and its needs. The City of Greenville's economic empowerment strategies focus primarily on private sector investment in the area. From this investment, local job growth in the area will serve as a benefit to residents of the neighborhood and within the community as a whole. There are several upcoming projects that will act as a catalyst to economic growth. For example, the 10th Street Connector project, Phase II of the West Fifth Street Streetscape, the future development on Albermarle Avenue, and current entrepreneurial programs.

The 10th Street Connector project, which will bisect the proposed NRSA, will attract new commercial and retail development opportunities into the area. The City of Greenville anticipates that the development along this corridor could potentially create an influx of new residents. Staff hopes that the new opportunities will provide jobs to people in the neighborhood and attract new residents to relocate to the area for employment purposes. The City remains hopeful of these types of outcomes because studies have shown that as public sector investment increases, private sector investment tends to follow.

Additionally, further development of the West Fifth Street Corridor (Phase II) will open up the area to an even larger amount of investment opportunities. Phase II will not only add to the neighborhood character, but additional fiber optic infrastructure will be added as well, therefore promoting technology-led entrepreneurship along the corridor. Moreover, the proposed Albemarle Avenue Commercial Corridor is an example of future commercial development that could be lead to the area. Albemarle Avenue is a proposed concept for the West Greenville area that will create a mixed-use residential neighborhood, infused with commercial retail. The Greenville Transportation Activity Center project will serve as another resource for low/moderate income residents of the area to obtain jobs or educational opportunities throughout the city.

The City of Greenville plans to make the West Greenville area a sustainable and thriving community for the future. In order to accomplish this, small business growth and development in the area is crucial. The Uptown Retail Challenge is an incentive aimed to attract new retail businesses to the Uptown Greenville Commercial District. Attracting new business to Uptown Greenville will economically empower the residents by providing potential employers to the residents who may lack the skills or education to obtain a career.

The Greenville Business Plan Competition is another program that targets commercial growth in the Center City -West Greenville Redevelopment area. This competition provides an economic incentive to small business owners and entrepreneurs who expand and create jobs within the Center City/West Greenville Redevelopment area. Economic incentives from this program range from \$15,000.00 to \$30,000 to be used toward working capital or operating funds, equipment purchases, improvements to owner-occupied property, leasehold improvements, expansion of business services or products, or other uses in a business plan. The benefit of reducing the record-keeping requirements for businesses operating in the area will greatly assist in providing additional economic opportunities within the proposed NRSA.

Finally, the City of Greenville is currently in the process of master planning the Dickinson Avenue corridor. The master planning of the corridor sought a highly experienced and creative team to complete a revitalization study of the Dickinson Avenue corridor between Reade Circle and 14th Street, which bisects and anchors the city's "warehouse district" within the West Greenville Redevelopment Area. The study area includes the Imperial Tobacco Warehouse site, the site of the future Greenville Transportation Activity Center (GTAC), two (2) National Register Historic Districts, and a cluster of State of NC-owned properties within ECU's Warehouse District (ECU Master Plan, 2012).

The City has an agreement with NC-DOT to rebuild historic Dickinson Avenue and a streetscape improvement plan for the corridor. The future 10th Street Connector also traverses the study area. Therefore, it is critical that the City maximize its opportunities in this area in ways that are economically and environmentally viable, while preserving and capitalizing on its unique character.

Performance Measures

The City understands that setting performance benchmarks in the proposed NRSA will allow for more effective and efficient monitoring and evaluation strategies. Staff has divided the measurements into three (3) main categories – housing, economic, and infrastructure. The City currently has in place several different performance measures for housing. These measures include, but are not limited to, increasing home ownership rates by 5-10% per year, adding 1 – 2 new homes per year, and rehabbing a minimum of eight (8) owner-occupied homes per year. Reaching these performance benchmarks has the potential to help the West Greenville area flourish. The increase in new homeowners and the economic value of sustaining the current building stock will help promote a more vibrant and safe community.

Economic benchmarks will be evaluated based on the expansion and addition of new businesses and jobs in the area. Staff has proposed several economic benchmarks. For example, the establishment of a grocery store, addition of three (3) new businesses, and the creation of 5 – 7 new jobs per year. The primary goal of the proposed NRSA is to create a flourishing and sustainable community within the boundaries and beyond. Staff hopes that by setting these measures we will be able to effectively monitor our progress and the progress of the market.

Infrastructure benchmarks will generally be evaluated based on the current state of the utilities, sidewalks, and streets throughout the proposed area. The primary factors for measuring these benchmarks are time, implementation cost, and the amount of funds allocated. For example, infrastructure improvements will be made along the West Fifth Street corridor by completing Phase II of the streetscape project. Additionally, the City intends to add several hundred linear feet of sidewalk per year within boundaries. There are a couple of expected benefits from this type of work. It will potentially provide health and mobility benefits for area residents, as well as safety benefits.

The progress in the proposed West Greenville NRSA will be recorded and listed in the City of Greenville’s Consolidated Annual Performance Evaluation Report (CAPER). Each year the CAPER will reflect the development of the West Greenville area. The current performance measures will serve as a reference for ideal progress and growth in the area, with the CAPER displaying figures congruent with these measures. The growth and development in the area will be closely monitored to ensure the efficacy of the redevelopment methods used by the City.

The tables below identify the goals and objectives for each performance measure:

Appendices



Appendix A: Resolution

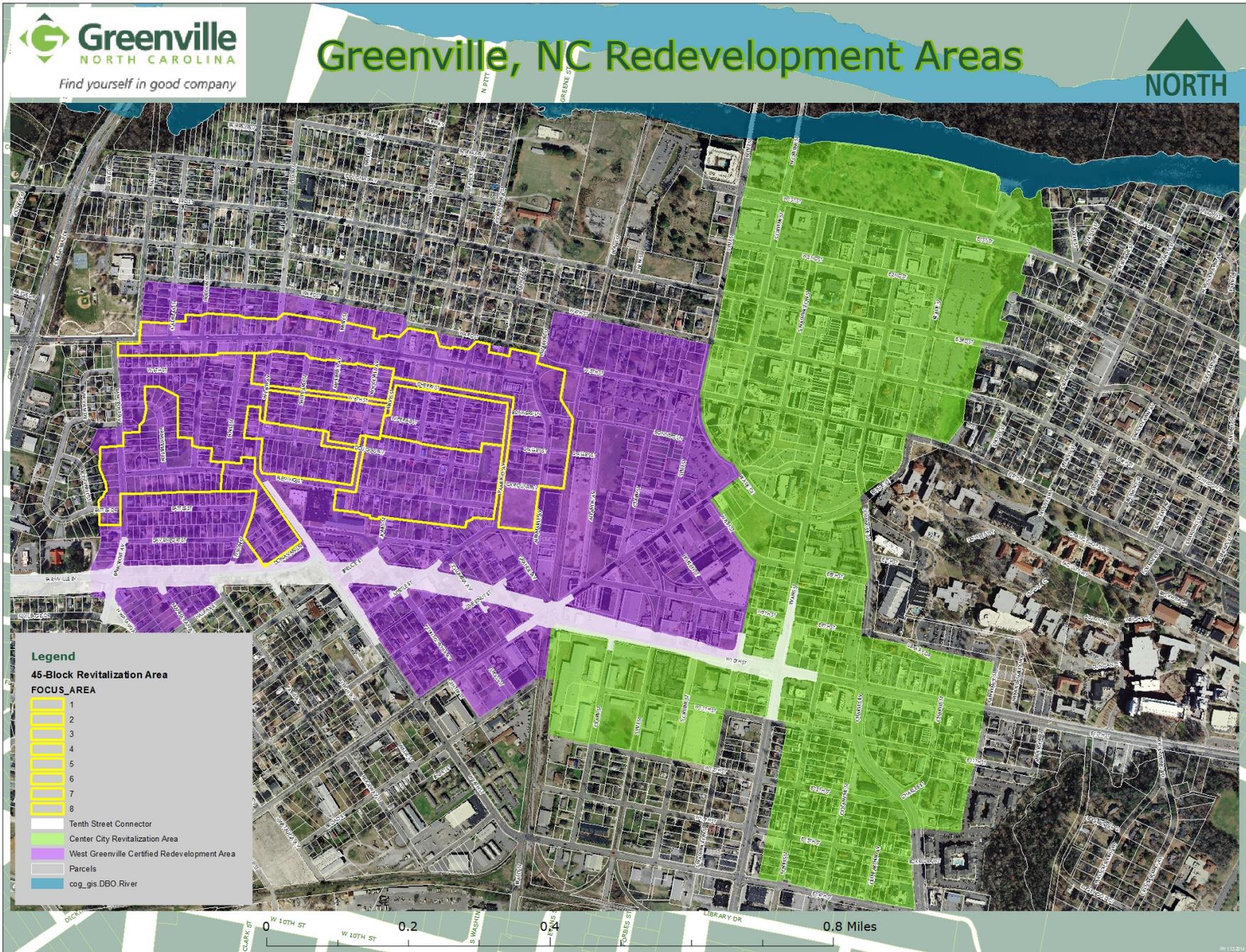
Appendix B: Application for Federal Assistance SF - 424

Appendix C: 2015 – 2016 Budget

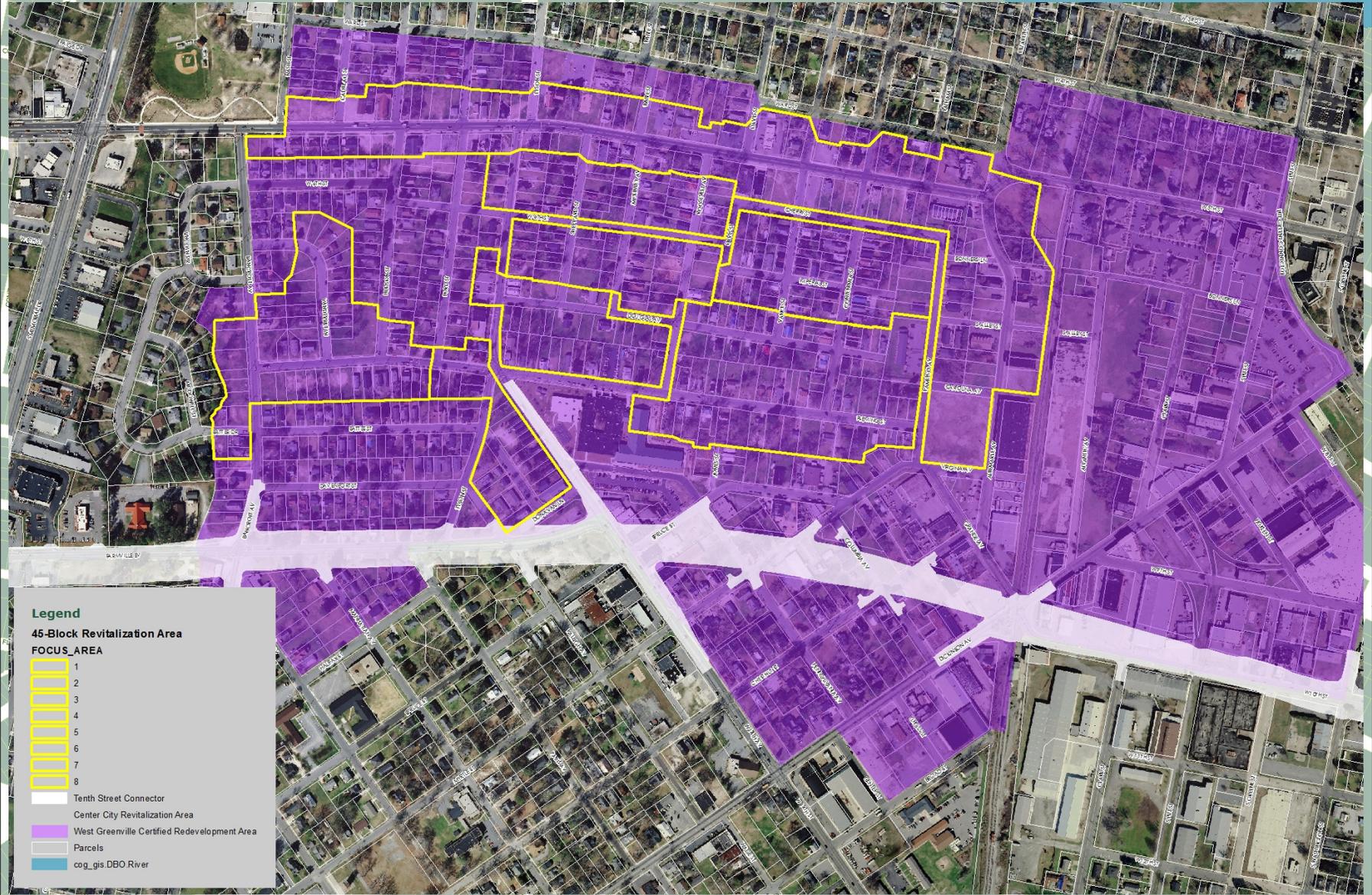
2015-2016 Budget Year

Proposed Activities	HOME	CDBG
Administration/Planning	\$38,000.00	\$168,000.00
Housing Rehabilitation	\$100,000.00 040-4650-452.24-00	\$182,000.00 040-4640-452.24-00
Down payment Assistance	\$30,000.00 040-4650-452.47-00	
CHDO/New Construction	\$57,571.00 040-4650-452.62-00	
Public Service		\$120,000.00 040-4640-452.23-00
Acquisition/Clearance		<u>\$65,000.00</u> Demolition = \$15,000.00 040-4640-452.55-00 Acquisition = \$50,000.00 040—4640-452.27-00
Relocation		\$5,000.00 040-4640-452.08-00
Public Facility Improvements		\$200,000.00 040-4640-452.23-04
Economic Development		\$100,143.00 040-4640-452.80-00
New Construction (multi-family)	\$158,237.00 040-4650-452.62-00	
TOTAL	\$383,808.00	\$840,143.00

Appendix D: Redevelopment Area Maps



West Greenville Redevelopment Area



Legend

45-Block Revitalization Area

FOCUS_AREA

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

Tenth Street Connector

Center City Revitalization Area

West Greenville Certified Redevelopment Area

Parcels

cog_gis DBO River



Appendix E: Publisher's Affidavits

PUBLISHER'S AFFIDAVIT

**NORTH CAROLINA
PITT COUNTY**

Bill Hudson affirms that he is ACCOUNT 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**

GREENVILLE CITY PAGE - PUBLIC NOTICE - NOTICE OF COMMUNITY MEETING TO
RECEIVE COMMENTS ON THE 2014-2015 FISCAL YEAR DRAFT ANNUAL ACTION PLAN

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

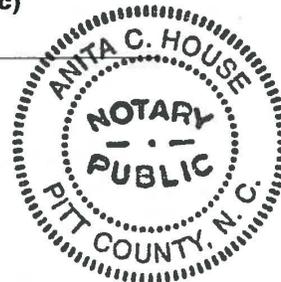
FEBRUARY 3, 2014 + FEBRUARY 10, 2014

**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 March, 20 14
Anita C. House

(Notary Public)

My commission expires 11/17/16.



PUBLISHER'S AFFIDAVIT

**NORTH CAROLINA
PITT COUNTY**

Bill Huson affirms that he is ACCOUNT 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**

GREENVILLE CITY PAGE- PUBLIC HEARING - 2014-2015 ANNUAL ACTION PLAN

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

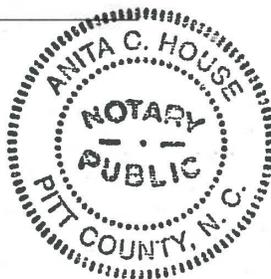
FEBRUARY 3, 2014 + FEBRUARY 10, 2014

**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 Huson
Affirmed and subscribed before me this 5th day
of March, 20 14
Anita C House

(Notary Public)

My commission expires 11/17/16



Appendix F: Citizen Participation Plan

**CITY OF GREENVILLE
COMMUNITY DEVELOPMENT DEPARTMENT
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 money. This plan must be available to the public.

Encouraging Public Participation:

The law requires that our Citizen Participation Plan both provide for and encourage public participation, emphasizing involvement by low and moderate-income persons, especially those located in Targeted Areas. 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 persons, and persons 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, Housing Division office located at 201 West Fifth Street, 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 opportunity, 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 Action 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 Action Plan or Consolidated Plan.
5. On occasion, it may be necessary to change the use of money already budgeted in an Action 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.
6. After a “program year” is complete, an Annual Performance Report must be drafted for public review, comment, and forwarded to HUD.

The Program Year

The “program year” for the City of Greenville is July 1st through June 30th.

PUBLIC NOTICE

Items Covered by the Public Notice Requirements:

There shall be advanced public notice once a federally required document is available, such as the proposed Annual Action Plan or the Five-Year Consolidated Plan, any proposed Substantial Amendment to the Action Plan or Consolidated Plan, and the Annual Performance Report.

In addition, there shall be advanced public notice of all public hearings and all public meetings such as Affordable Housing Loan Committee meetings relating to the funds or planning process covered by this Citizen Participation Plan.

“Adequate” Public Notice

Adequate advance notice is “timely”; it is given with enough lead-time for the public to take informed action. The amount of lead-time can vary depending on the event. Specific amounts of time are given for different events later in this Citizen Participation Plan. The content of notices will give residents a clear understanding of the event being announced.

Forms of Public Notice

Public notices will be published in the “Daily Reflector” on the City Page or in a non-legal section of the newspaper.

PUBLIC ACCESS TO 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 Annual Action Plans, the proposed and final Consolidated Plan, proposed and final Substantial Amendments to either 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 no 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 Community Development Department, Housing Division located at 201 West Fifth Street; City Hall, 200 West Fifth Street, 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 Hearings:

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 City Hall, 200 West Fifth Street, 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.

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 07-35, was adopted May 10, 2007 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 Projects. Public Services may include homeownership counseling, youth development 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 September 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.

□ 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 ACTION PLAN and/or CONSOLIDATED PLAN.

Copies of the Final Annual Action Plan and a summary 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; 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 greater than 20% from one activity to another.
2. A change in the use of HOME money greater than 20% 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 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 greater than 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 ANNUAL PERFORMANCE REPORT:

Every year, the City of Greenville must send to HUD an Annual Performance Report within 90 days of the close of the program year. In general the Annual Performance Report 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 for Annual Performance Report.**
There must be reasonable notice that an Annual Performance Report is available so that residents will have an opportunity to review and comment. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for Annual Performance Reports:
1. There will be 30 days advance notice of the availability of an Annual Performance Report before the report is submitted to HUD.
 2. A complete copy of the Annual Performance Report will be made available to the public.

3. In preparing an Annual Performance Report for submission to HUD, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony or submitted in writing. The Annual Performance Report sent to HUD will have a section that presents all comments and explanations why any comments were not accepted.

COMPLAINT PROCEDURES:

Written complaints from the public will receive a meaningful, written reply within 15 working days.

CHANGING THE CITIZEN PARTICIPATION PLAN:

This Citizen Participation Plan can be changed only after the public has been notified and only after the public has had a reasonable chance to review and comment on proposed substantial changes.

Adopted this 8th day of May 2008.

Signature on File

Patricia C. Dunn, Mayor

Attest:

Signature on File

Wanda Elks, City Clerk

Appendix G: Anti-Displacement and Relocation Assistance Plan

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 livable 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.

/s/Robert D. Parrott
Robert D. Parrott, Mayor

ATTEST:

/s/Wanda T. Elks
Wanda Elks, City Clerk

Appendix H: Affirmative Marketing Policy

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:

6. In the sale or rental of housing or residential lots;
7. In advertising the sale or rental of housing;
8. In the finance of housing;
9. In the provision of real estate brokerage services; or
10. 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 ____ day of June, 2009.

Signature on File

Patricia C. Dunn, Mayor

Attest:

Signature on File

Wanda Elks, City Clerk

Appendix I: Section 3 Plan

RESOLUTION 012-12
A RESOLUTION TO ADOPT THE SECTION 3 PLAN
TO COMPLY WITH 24 CFR, PART 135 OF THE UNITED STATES DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT SECTION 3

WHEREAS, the United States Congress passed Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) to further the goal of ensuring that federal funds benefit the residents of projects funded wholly or in part by those funds; and

WHEREAS, Part 135 of Section 3 is to establish the standards and procedures to be followed to ensure that the objectives of Section 3 are met; and

WHEREAS, the City of Greenville Community Development Department staff has developed a Section 3 Plan in adherence to 24 CFR, Part 135 that more comprehensively addresses the standards and procedures prescribed in the Act;

NOW, THEREFORE, BE IT RESOLVED THAT the City Council of the City of Greenville authorizes the Community Development Department to adopt and implement the Section 3 Plan to ensure compliance with Federal Law.

Adopted this 8th day of March, 2012.

Signature on File

Allen M. Thomas, Mayor

ATTEST:

Signature on File

Carol L. Barwick, City Clerk

City of Greenville Section 3 Plan	2012
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Community Development Department
201 West 5th Street
Greenville, NC 27834
Adopted March 8, 2012
DM #919470

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I. General Policy Statement

It is the policy of the Community Development Department of the City of Greenville to require its contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment.

The Community Development Department implements this policy through the awarding of contracts to contractors, vendors, and suppliers, to create employment and business opportunities for Section 3 residents and other qualified low- and very low-income persons.

The policy shall result in a reasonable level of success in the recruitment, employment, and utilization of Greenville's Section 3 residents and other eligible persons and Section 3 businesses for contracts partially or wholly funded with Section 3 covered funding from the United States Department of Housing and Urban Development (HUD). The Community Development Department shall examine and consider a contractor's or vendor's potential for success by providing employment and business opportunities to Section 3 residents prior to acting on any proposed contract award.

II. Section 3 Purpose

Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u) (Section 3) requires the Community Development Department to ensure that employment and other economic and business opportunities generated by the Department of Housing and Urban Development (HUD) Section 3 financial assistance, to the greatest extent feasible, are directed to public housing residents and other low-income persons, particularly recipients of government housing assistance, and business concerns that provide economic opportunities to low- and very-low income persons.

III. Section 3 Contracting Policy and Procedure

The Community Development Department will adopt a Section 3 Contracting Policy and Procedure to be included in all procurements generated for use with covered HUD funding. The policy and procedure contains goal requirements for awarding contracts to Section 3 Business Concerns.

All contractors/businesses seeking Section 3 preference must complete certifications, as appropriate, as acknowledgement of the Section 3 contracting and employment provisions required before submitting bids/proposals to the Community Development Department. Such certifications shall be adequately supported with appropriate documentation as referenced in the Section 3 Business Application.

IV. Section 3 Plan

The Community Development Department will maintain a Section 3 Action Plan to identify the goals, objectives, and actions that will be implemented to ensure compliance with the requirements of Section 3. In addition, contractors will be required to submit a Section 3 Action Plan on each project.

V. Section 3 Employment & Training Goals

It is the policy of the Community Development Department to utilize residents and other Section 3 eligible persons and businesses in contracts partially or wholly funded with Section 3 covered funding from the Department of Housing and Urban Development (HUD). The Community Development Department has established employment and training goals that contractors and subcontractors should meet in order to comply with Section 3 requirements. (Reference 24 CFR 135.30 – Numerical goal for meeting the greatest extent feasible requirement). The numerical goal is:

- Thirty percent (30%) of the aggregate number of new hires in any fiscal year for contractors with contracts funded with federal grant funds.

It is the responsibility of contractors, vendors and suppliers to implement progressive efforts to attain Section 3 compliance. Any contractor that does not meet the Section 3 numerical goals must demonstrate why meeting the goals were not feasible. All contractors submitting bids or proposals to the Community Development Department are required to certify that they comply with the requirements of Section 3.

The Section 3 Contract Clause specifies the requirements for contractors hired for Section 3 covered projects. The Section 3 Clause must be included in all Section 3 covered projects. The Section 3 Contract Clause is included in Exhibit 1.

VI. Section 3 Program Participant Certification Procedure

The Community Development Department has developed a partnership with Pitt Community College Job Training program, to meet the Section 3 resident requirement. Pitt Community College will certify Section 3 program participants who reside in the City of Greenville and who are seeking preference in training and employment by completing and attaching adequate proof of Section 3 eligibility, as required (see Exhibit 3 – Section 3 Business Certification and Resident Application).

VII. Preference for Contracting With Section 3 Business Concerns

The Community Development department, in compliance with Section 3 regulations, will require contractors and subcontractors (including professional service contractors) who receive Section 3 covered funds (any Housing and Community Development funds that are housing rehabilitation, housing construction, and other public construction) to direct their efforts towards contracting with Section 3 business concerns in the following order of priority:

- **Category 1:** Business concerns that are 51% or more owned by residents of the housing development for which the work is performed, or whose full-time, permanent workforce includes 30% of these persons as employees.
- **Category 2:** Business concerns that are 51% or more owned by residents of the Housing Authority other than the housing development where the work is to be performed; or whose full-time permanent workforce includes 30% of these persons as employees.
- **Category 3:** Business concerns that are 51% or more owned by a Section 3 resident(s), or whose permanent, full-time workforce includes no less than 30% Section 3 residents (category 4 business); or that subcontract in excess of 25% of the total amount of subcontracts to Section 3 business concerns.
- **Category 4:** HUD Youthbuild programs being carried out in the service area in which Section 3 covered assistance is expended.

All contractors and subcontractors who receive awards are expected to extend, to the greatest extent feasible, efforts to achieve the numerical goals established by Community Development Department. In addition, contractors and subcontractors who receive awards exceeding \$100,000 in one program year share have the responsibility of enforcing the Section 3 regulations and requirements.

VIII. Assisting Contractors to Achieve Section 3 Goal Hiring and Contracting Goals

The Community Development Department will assist contractors in achieving Section 3 hiring and contracting goals by:

1. Requiring the contractor to submit a Section 3 Action Plan, to the Section 3 Coordinator complete with the number of subcontracting and/or employment opportunities expected to be generated from the initial contract.
2. The contractor(s) will be referred to Pitt Community College for obtaining a list of interested and qualified Section 3 residents for construction projects when new hires are expected as a result of the contract.

3. Pitt Community College will inform contractor of known issues that might affect Section 3 residents from performing job related duties.
4. Section 3 Coordinator will provide contractor with a list of Section 3 business concerns interested and qualified for construction projects.
5. Section 3 Coordinator will review the new hire clause with contractors and subcontractors to ensure that the requirement is understood. It is not intended for contractors and subcontractors to terminate existing employees, but to make every effort feasible to employ Section 3 program participants before any other person, when hiring additional employees needed to complete proposed work to be performed with HUD (federal) funds.

IX. Section 3 Business Certification Procedure

Any business seeking Section 3 preference in the awarding of contracts with the Community Development Department shall complete the Section 3 Business Certification form (see Exhibit 3, Business Certification and Resident Application), which can be obtained from the City's Section 3 Coordinator. The business seeking Section 3 preference must be able to provide adequate documentation as evidence of eligibility for preference under the Section 3 Program.

Certifications for Section 3 preference for business concerns must be submitted to the Section 3 Coordinator prior to the submission of bids for approval. If the Section 3 Coordinator previously approved the business concern to be Section 3 certified, then the certification can be submitted along with the bid. Section 3 business concerns certifying as "Subcontracting Commitment" must be certified on a per-project basis.

X. Efforts to Award Contract Opportunities to Section 3 Business Concerns

The Community Development Department may use the following methods to notify and contract with Section 3 business concerns when contracting opportunities exist.

- Advertise contracting opportunities via newspaper, mailings, posting notices that provide general information about the work to be contracted and where to obtain additional information.
- Provide written or electronic notice of contracting opportunities to all known Section 3 business concerns. The notice will be provided in sufficient time to enable business concerns the opportunity to respond to the bid invitation.
- Conduct workshops on contracting procedures to include bonding and insurance requirements, and other pertinent requirements, in a timely manner in an effort to allow Section 3 business concerns the opportunity to take advantage of any upcoming contracting opportunities.

- Contact business assistance agencies, Minority and Women’s Business Enterprise (M/WBE) contractor associations and community organizations to inform them of contracting opportunities and to request their assistance in identifying Section 3 businesses.
- Establish relationships with the Small Business Administration (SBA), Minority and Women’s Business Enterprise M/WBE association, Community Development Corporations, and other sources as necessary to assist with educating and mentoring residents with a desire to start their own businesses.
- Seek out referral sources in order to ensure job readiness for Section 3-qualified residents through on-the-job-training and mentoring to obtain necessary skills that will transfer into the external labor market.

Section 3 Preference Policy

- The City of Greenville will grant a preference credit of 10%, up to a value of \$2,999.99, to a certified Section 3 business when evaluating any competitive solicitation.

In order for a vendor to be considered for Section 3 Preference points the vendor must be a certified Section 3 business concern as defined in IX of this Plan.

XI. Section 3 Residents Recruitment, Training, and Employment Goals

The Community Development Department will develop resources to provide training and employment opportunities to Section 3 program participants by implementing the following:

- A database will be developed by Pitt Community College of certified Section 3 residents of public housing and other Section 3 residents.
- Pitt Community College will conduct a skill assessment of Section 3 residents of public housing and other Section 3 residents.
- A database will be developed by Community Development Department of eligible qualified Section 3 Business concerns to contact with respect to the availability of contract opportunities.
- A provision for a specific number of public housing or Section 3 program participants to be trained or employed by the contractor will be incorporated into the contract.

XII. Employment of Section 3 Program Participants

Community Development has developed a partnership with Pitt Community College to assist in providing employment opportunities to Section 3 residents.

Pitt Community College will conduct a pre-screening interview with all Section 3 residents prior to being hired by a contractor.

- The pre-interview will assess job readiness (i.e., childcare, transportation, work maturity, job retention skills). Only residents meeting the minimum qualifications of the contractor or subcontractor will be referred to the job site. Residents not deemed job ready would be referred elsewhere. It is imperative that the resident's basic needs are met prior to employment.
- If a resident is referred to a contractor and does not perform satisfactorily due to poor work habits (i.e., tardiness, absenteeism, alcohol/drugs, abusive language, fighting, etc.) she/he will be allowed one additional opportunity to be referred to other contractors. If after that time the resident still does not perform satisfactorily, she/he will be referred to complete a job readiness class, alcohol/drug treatment center, or any other program that he or she may be required to attend. After successful completion the resident will be given the opportunity to be reinstated on the list of residents available for work.
- Residents experiencing problems with contractors should first communicate the problem to the Section 3 Coordinator. If the problem cannot be solved between the employee and employer, the Section 3 Coordinator will meet with the parties involved to assist in trying to resolve the problem. Residents and employers (contractors or subcontractors) should document problems whenever they occur and record any and all efforts to correct them. The written documentation of the problem should be submitted to the Section 3 Coordinator.
- In order to qualify for employment with contractors, residents must be at least eighteen years of age.

XIII. Contractor's Requirements in Employing Section 3 Participants

Under the City of Greenville Section 3 Program, contractors and subcontractors are required to:

- Provide employment opportunities to Section 3 residents/participants in the priority order listed below:
 - a) **Category 1 – Section 3 Resident**
Residents of the housing development or developments for which the contract shall be expended.

b) Category 2 – Section 3 Resident

Residents of other housing developments managed by the Greenville Housing Authority.

c) Category 3 – Section 3 Resident

Participants in HUD Youthbuild program being carried out in the project boundary area.

d) Category 4 – Section 3 Resident

Residents with a current Section 8 Housing Choice Voucher living in Greenville or residents residing in the City who meet the income guidelines for Section 3 preference (refer to Section 3 Income Limits).

- Notify the Section 3 Coordinator of their interests regarding employment of Section 3 participants prior to hiring. Pitt Community College will then be notified and will ensure that the participant is Section 3 eligible by assessing the Section 3 resident database to ensure job readiness.
- Submit a list of core employees (including administrative, clerical, planning and other positions pertinent to the construction trades) at the time of contract award and provide the number of new hires expected as a result of being awarded the contract. (This is part of the required Section 3 Action Plan.)
- Document the performance of Section 3 participants (positive and negative), regarding punctuality, attendance, etc.
- Immediately notify Pitt Community College of any problems experienced due to the employment of Section 3 participants.
- Immediately notify Pitt Community College if a participant quits, walks off, or is terminated for any reason. The contractor must provide written documentation of all such incidents to support such decisions to Pitt Community College to determine if an investigation is warranted.

XIV. Internal Section 3 Complaint Procedure

In an effort to resolve complaints generated due to non-compliance through an internal process, Community Development encourages submittal of such complaints to its Section 3 Coordinator as follows:

- Complaints of non-compliance should be filed in writing and must contain the name of the complainant and brief description of the alleged violation of 24 CFR 135.
- Complaints must be filed within thirty (30) calendar days after the complainant becomes aware of the alleged violation.

- An investigation will be conducted if complaint is found to be valid. The Section 3 Coordinator will conduct an informal, but thorough investigation affording all interested parties, if any, an opportunity to submit testimony and/or evidence pertinent to the complaint.
- The Section 3 Coordinator will provide written documentation detailing the findings of the investigation. The Community Development Director will review the findings for accuracy and completeness before it is released to complainants. The findings will be made available no later than thirty (30) days after the filing of complaint.

If complainants wish to have their concerns considered outside of the Community Development Department a complaint may be filed with:

*Assistant Secretary for Fair Housing and Equal Opportunity
United States Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410*

The complaint must be received not later than 180 days from the date of the action or omission upon which the complaint is based, unless the time for filing is extended by the Assistant Secretary for good cause shown.

XV. Definitions

Applicant – Any entity which makes an application for Section 3 covered assistance, and includes, but is not limited to, any State, unit of local government, public housing agency or other public body, public or private nonprofit organization, private agency or institution, mortgagor, developer, limited dividend sponsor, builder, property manager, community housing development organization, resident management corporation, resident council, or cooperative association.

Assistant – the Assistant Secretary for Fair Housing and Equal Opportunity.

Business Concern – a business entity formed in accordance with State law, and which is licensed under State, county or municipal law to engage in the type of business activity for which it was formed.

Contractor - any entity which contracts to perform work generated the expenditure of Section 3 covered assistance, or for work in connection with a Section 3 covered project.

Employment Opportunities Generated by Section 3 Covered Assistance – all employment opportunities generated by the expenditure of Section 3 covered public assistance (i.e., operating assistance, development assistance and modernization assistance, (as described in Section 135.3 (a) (1)). With respect to Section 3 covered housing and community development assistance, this

term means all employment opportunities arising in connection with Section 3 covered projects (as described in Section 135.3 (a) (2)), including management and administrative jobs. Management and administrative jobs include architectural, engineering or related professional services required to prepare plans, drawings, specifications, or work write-ups; and jobs directly related to administrative support of these activities, e.g., construction manager, relocation specialist, payroll clerk, etc.

Housing Authority (HA) – Public Housing Agency.

Housing Development – low-income housing owned, developed, or operated by public housing agencies in accordance with HUD’s public housing program regulations codified in 24 CFR Chapter IX.

HUD Youthbuild Programs – programs that receive assistance under subtitle D of Title IV of the National Affordable Housing Act, as amended by the Housing and Community Development Act of 1992 (42 U.S.C. 12899), and provide disadvantaged youth with opportunities for employment, education, leadership development, and training in the construction or rehabilitation of housing for homeless individuals and members of low- and very low-income families.

Pitt Community College - provides employment and training services to the residents of Greenville who are most in need of services. The highest priority to receive services are those who are unemployed, economically disadvantaged, and/or face multiple obstacles to gaining employment. Pitt Community College ensures that programs provided youth and adults academic enrichment, basic skills, and job specific skills training for those individuals who need them. Job seekers have access to vocational counseling, job search workshops, labor market information, job search computers, personal computers, and career planning workshops.

JTPA – The Job Training Partnership Act (29 U.S.C. 1579 (a)).

Low-income person – families (including single persons) whose incomes do not exceed 80 percent of the median income for the area, as determined by the Secretary, with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of the Secretary’s findings that such variations are necessary because of prevailing levels of construction costs or unusually high or low-income families.

Metropolitan Area – a metropolitan statistical area (MSA), as established by the Office of Management and Budget.

New Hires – full-time employees for permanent, temporary or seasonal employment opportunities.

Recipient – any entity which receives Section 3 covered assistance, directly from HUD or from another recipient and includes, but is not limited to, any State unit of local government, PHA, or other public body, public or private nonprofit organization, private agency or institution,

mortgagor, developer, limited dividend sponsor, builder, property manager, community housing development organization, resident management corporation, resident council, or cooperative association. Recipient also includes any successor, assignee or transferee of any such entity, but does not include any ultimate beneficiary under the HUD program to which Section 3 applies and does not include contractors.

Section 3 – Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).

Section 3 Business Concern – a business concern,

- 1) That is 51 percent or more owned by Section 3 resident: or
- 2) Whose permanent, full-time employees include persons, at least 30 percent of whom are currently Section 3 residents, or within three years of the date of first employment with the business concern were Section 3 residents; or
- 3) That provides evidence of a commitment to subcontract in excess of 25 percent of the dollar award of all subcontractors to be awarded to business concerns that meet the qualifications set forth in paragraphs 1 or 2 above.

Section 3 Covered Assistance –

- 1) Public housing development assistance provided pursuant to Section 5 of the 1937 Act;
- 2) Public housing operating assistance provided pursuant to Section 9 of the 1937 Act;
- 3) Public housing modernization assistance provided pursuant to Section 14 of the 1937 Act;
- 4) Assistance provided under any HUD housing or community development program that is expended for work arising in connection with housing rehabilitation, construction, or other public construction project (which includes other buildings or improvements, regardless of ownership).

Section 3 Clause – the contract provisions set forth in Section 135.38.

Section 3 Covered Contracts – a contract or subcontract (including a professional service contract) awarded by a recipient or contractor for work generated by the expenditure of Section 3 covered assistance, or for work arising in connection with a Section 3 covered project. Section 3 covered contracts do not include contracts awarded under HUD’s procurement program, which are governed by the Federal Acquisition Regulation (FAR). Section 3 covered contracts also do not include contracts for the purchase of supplies and materials. However, whenever a contract for materials includes the installation of the materials, the contract constitutes a Section 3 covered contract.

Section 3 Covered Project - the construction, reconstruction, conversion or rehabilitation of housing (including reduction and abatement of lead-based paint hazards), other public

construction which includes buildings or improvements (regardless of ownership) assisted with housing or community development assistance.

Section 3 Resident – a public housing resident or an individual who resides in the metropolitan area or nonmetropolitan county in which the Section 3 covered assistance is expended and who is considered to be a low-to very low-income person.

Subcontractor – any entity (other than a person who is an employee of the contractor) which has a contract with a contractor to undertake a portion of the contractor’s obligation for the performance of work generated by the expenditure of Section 3 covered assistance, or arising in connection with a Section 3 covered project.

Very low-income person – families (including single persons) whose income do not exceed 50 percent of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of the Secretary’s findings that such variations are necessary because of unusually high or low family incomes.

Exhibit 1 - Section 3 Clause

All Section 3 covered contracts shall include the following clause (referred to as the Section 3 Clause):

- A. The work to be performed under this contract is subject to the requirements of section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.
- B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.
- C. The contractor agrees to send to each labor organization or representative or workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.
- D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.
- E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.
- F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

- G. With respect to work performed in connection with Section 3 covered Indian housing assistance, section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 to the maximum extent feasible, but not in derogation of compliance with section 7(b).

Exhibit 2 - Section 3 Contracting Policy and Procedure

The purpose of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal State, and local laws and regulations, be directed to low and very-low income individuals, especially recipients of government assistance for housing, and to business concerns which provide economic opportunities to low and very-low income individuals. (Section 3 means section 3 of the Housing and Urban Development Act of 1968, as amended 12 U.S.C. 1701u).

Section 3 requirements apply to all contractors and subcontractors (including a professional service contract) performing work in connection with the expenditure of Section 3 covered assistance, or for work arising in connection with a Section 3 covered project, regardless of the amount of the contract or subcontract. Section 3 covered contracts do not include contracts for the purchase of supplies and materials unless the contract includes the installation of the materials.

A business concern seeking to qualify for a Section 3 contracting preference shall certify or submit evidence that the business concern qualifies as a Section 3-business concern. The Section 3 business must also be able to demonstrate its ability to complete the contract. The ability to perform successfully under the terms and conditions of the proposed contract is required of all contractors and subcontractors subject to the procurement standards of 24 CFR 85.36, 24 CFR 85.36b(8).

Contractors who do not qualify as Section 3 business concerns, but who enter into contracts with the City of Greenville must agree to comply with certain general conditions (refer to Section 3 Clause). All contractors and subcontractors, including Section 3 businesses, must comply with these general conditions. Failure to comply with these general conditions may lead to sanctions which can include termination of the contract for default and suspension or debarment from future HUD-assisted contracts.

Exhibit 3 – Business Certification and Resident Application

SECTION 3 CERTIFICATION PROGRAM ELIGIBILITY CRITERIA

Section 3 business concern means a business as defined in this section.

- (1) That is 51 percent or more owned by Section 3 residents; or
- (2) Whose permanent, full-time employees include persons, at least 30 percent of whom are currently Section 3 residents, or within three years of the date of first employment with the business concern were Section 3 residents, or
- (3) That provides evidence of a commitment to contract in excess of 25 percent of the total dollar award of all subcontracts to be awarded to business concerns that meet the qualifications set forth in paragraphs (1) or (2) in this definition of “Section 3 business concern”.

Section 3 resident means, for the purposes of the City of Greenville

- (1) A Greenville public housing resident; or
- (2) An individual who resides in Greenville and who is:
 - a. *A low-income person*, as this term is defined in section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)). Section 3(b)(2) of the 1937 Act defines this term to mean families (including single persons) whose incomes do not exceed 80 per centum of the median income for the area, as determined by the Secretary, with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80 per centum of the median for the area on the basis of the Secretary's findings that such variations are necessary because of prevailing levels of construction costs or unusually high or low-income families; or
 - b. *A very low-income person*, as this term is defined in section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)). Section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)) defines this term to mean families (including single persons) whose incomes do not exceed 50 per centum of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50 per centum of the median for the area on the basis of the Secretary's findings that such variations are necessary because of unusually high or low family incomes.

Section 3 covered assistance means

- (1) Assistance provided under any Greenville housing or community development program that is expended for work arising in connection with:
 - a. Housing rehabilitation (including reduction and abatement of lead-based paint hazards, but excluding routine maintenance, repair and replacement);
 - b. Housing construction; or
 - c. Other public construction projects (which includes other buildings or improvements, regardless of ownership).

Application Checklist for Completeness

Applicants must provide ALL of the attachments indicated for their respective Section 3 application:

DOCUMENT		Application Type		
		51% Ownership	30 % Employment	25 % Commitment
Application Form – Part 1. Company Information				
Application Form – Part 2, A. Ownership Information				
Application Form – Part 2, B. Company Employee Information				
Application Form – Part 2, C. Subcontracting Commitment				
Application Form –Attestation				
Application Form – Section 3 Resident Application:				
AND	Section 3 Resident Application			
	Copy of Documents Verifying Eligibility			
Certifications by other government agencies (if applicable)				
Certificate of Assumed Business Name (if applicable)				
Partnership Agreement (if applicable)				
Articles of Incorporation/Organization				
Purchase Agreements (if needed to demonstrate ownership)				
Stock Certificates (if needed to demonstrate ownership)				
List of All Employees				
Payroll Records				
List of Sub-contracts (for reference purposes)				

Application

Part 1. Company Information

Company Name: _____	
Doing Business As (DBA): _____	
Street Address: _____	
City: _____	County: _____ State: _____ Zip: _____
Mailing Address (if different than above): _____	
City: _____	State: _____ Zip: _____
Primary Contact: _____	Title: _____
Phone: _____	Fax: _____
Web Site Address: _____	Email Address: _____
Description of Product(s) and/or Service(s) (use additional sheet if necessary): _____ _____	
Federal Tax ID #: _____	State Tax ID #: _____

Legal Structure:

- Individual/Sole Proprietorship
 Partnership
 C-Corporation
 S-Corporation
 Limited Liability Company

Part 2. Select Section 3 Certification Type

A. Category 1 - Section 3 Ownership (51% Ownership by Section 3 Resident)

If there is more than one owner, attach the following information for each additional owner on a separate sheet.

First Name: _____ Middle Initial: _____ Last Name: _____

Title: _____ Social Security Number: _____

Phone: _____

Residence Address: _____

City: _____ State: _____ Zip: _____

Have there been any changes in ownership in the last year? Yes No

*If yes, please provide details on a separate sheet.

% of Ownership: _____ Owner Since (mm/yyyy): _____

Hours Devoted to Business per Week: _____

- Each owner has completed a Participant Survey (blank copy is provided in this application)
 Each owner has made copies of family income verification and proof of residency and attached to this application

B. **Category 2 - Section 3 Employees (30% Employment of Section 3 residents)**

Each employee requesting Section 3 preferences must submit a Section 3 Resident Form and include family income verification and proof of residency.

List all the company's employees on a separate form. Provide a copy of your company's payroll records. Indicate the total number of full and part time employees: FT _____ PT _____

C. **Category 3 - Subcontracting Commitment Information - 25% Subcontracts will be awarded to certified Section 3 business(es)***

***This Section 3 certification is completed on a per-project basis.**

List all the company's subcontractors to be utilized on a separate sheet. Include company name and contact information.

Indicate the total dollar amount to be subcontracted:

Indicate the dollar amount awarded to Section 3 businesses:

Attestation

This section must be completed by an authorized representative of the business that is applying for certification.

I certify that the statements provided in this application are true and correct. Furthermore, I understand that the information provided herein is subject to North Carolina General Statute's governing Local Government activities or other applicable laws, that it would likely be classified as public, and that it is the responsibility of the Applicant Firm to claim and defend any other classification. I understand that the certifying entities reserve the right to request additional information and to perform on-site checks as necessary. I also understand that intentionally supplying false information for the purpose of obtaining certification will be sufficient reason for rejection of this application and/or removal from the Section 3 Certification Program.

Signature

Date

Print Name

Title

I have attached the documents on the Checklist for Completion

Section 3 Resident Application

Legal Last Name _____	Legal First Name _____
Middle Initial _____ Age _____ Social Security Number _____	
Street Address _____ Apt. # _____	
City _____ Zip _____ Cell Phone # _____	
Email Address: _____	
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	
Ethnicity: <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Non-Hispanic or Non-Latino	
Race (check all that apply): <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian	
<input type="checkbox"/> Black/African American <input type="checkbox"/> Hawaiian Native/Pacific Islander <input type="checkbox"/> White	

FAMILY MEMBERS		
Name (First, Last)	Age	Relationship to you
1.		Self
2.		
3.		
4.		
5.		
6.		
7.		

INCOME SOURCES

To determine your family's income, check all of the following and calculate the gross income that any family member 18 years and older received, or is expected to receive in the next 12 months:

Wages, salaries, overtime pay, commissions, fees, tips, bonuses, or other compensation

Income or gain from CD's, money market accounts, brokerage accounts, stocks, bonds, or Treasury Bills

Periodic payments from Social Security, disability/death benefits, pensions, retirement funds, annuities, insurance policies, or similar types of periodic benefits payments

Payments in lieu of earnings, such as unemployment and disability compensation, workers compensation or severance pay

Welfare assistance or TANF benefits

- Child support, spousal support/alimony, or regular contribution or gifts from persons not residing in the household including scholarships, parental gifts for tuition, etc.
- Revocable trust
- Lump sum payment or receipt of inheritances, capital gains, lottery winnings, victims' restitution or insurance settlements
- Real estate other than the primary residence or other capital investments
- Yes* *No* Do you receive housing assistance (Section 8, Subsidized)?
\$ _____ (amount)

Talk to agency staff for help in determining income category for your household.

I certify that the information on this application is accurate and complete. I authorize the City of Greenville and Pitt Community College to verify the information provided if necessary.

Print Name of Applicant

Signature of Applicant

Date

Warning: Section 1001 of Title 18 of US. Code makes it a criminal offense to make false statements or misrepresentations to any Department or Agency of the U.S. as to matters within its jurisdiction.

Section 3 Acknowledgement

By signing below, you are acknowledging that you have read the City of Greenville Section 3 Plan and understand the requirements of Section 3 as it applies to your agency and that your agency will comply with all Section 3 requirements and submit necessary documentation to the City of Greenville.

Any failure to comply with Section 3 regulations may result in revocation of funds from the City of Greenville and may jeopardize future funding opportunities from the City of Greenville.

Signature on File

Signature of Authorized Official

Name of Authorized Official

Title

Date