

2016-2017 Annual Action Plan

CDBG/HOME Programs

July 1, 2016 –June 30, 2017

William “Bill” Bencini, Mayor
Greg Demko, City Manager

City Council Members:

Jeff Golden, Ward 1, Mayor Pro Tem
Alyce Hill, Ward 3
Jim Davis, Ward 5
Latimer Alexander, At-Large

Christopher Williams, Ward 2
Jay W. Wagner, Ward 4
Jason Ewing, Ward 6
Cynthia Davis, At-Large



Submitted by

Community Development & Housing Department

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I. Executive Summary

The City of High Point's 2016-2017 Annual Action Plan, the second year of a 5-year Consolidated Plan spanning from 2015 - 2019, describes activities proposed for funding and implementation during FY 2016-2017. The Action Plan sets forth a description of proposed activities, establishing goals and objectives for each of them. The Plan is based on the housing and community priority needs as defined in the Consolidated Plan¹ along with the anticipated financial resources available to address those needs. The Plan also contains goals and measurable objectives for projects and activities which implement strategies established in the Consolidated Plan. The 2016-2017 Annual Action Plan complies with regulations issued by the U.S. Department of Housing and Urban Development (HUD) in 1995. HUD requires Entitlement² communities such as High Point to consolidate its planning, application and reporting requirements for HUD programs including the Community Development Block Grant (CDBG) and the HOME Investment Partnership Act programs (HOME). The Action Plan must be prepared each year. It is presented for approval to the Community Development Citizens Advisory Council and High Point City Council. It must be submitted to HUD by May 15, 2016. A final Plan will be made available for review on the City's website www.highpointnc.gov/cd and in print form at the Community Development and Housing Department's office, 211 S. Hamilton Street, Suite 312, High Point, NC 27260.

II. Community Development and Housing Department Overview

The City of High Point's Community Development and Housing Department (CD&H) is committed to providing the highest level of service and a broad range of opportunities to its customers. Recognizing that neighborhoods cannot be strengthened simply with "sticks and bricks," the Department implements a diverse, but coordinated mixture of programs ranging from affordable housing activities to public services to various neighborhood improvement activities and community-capacity building.

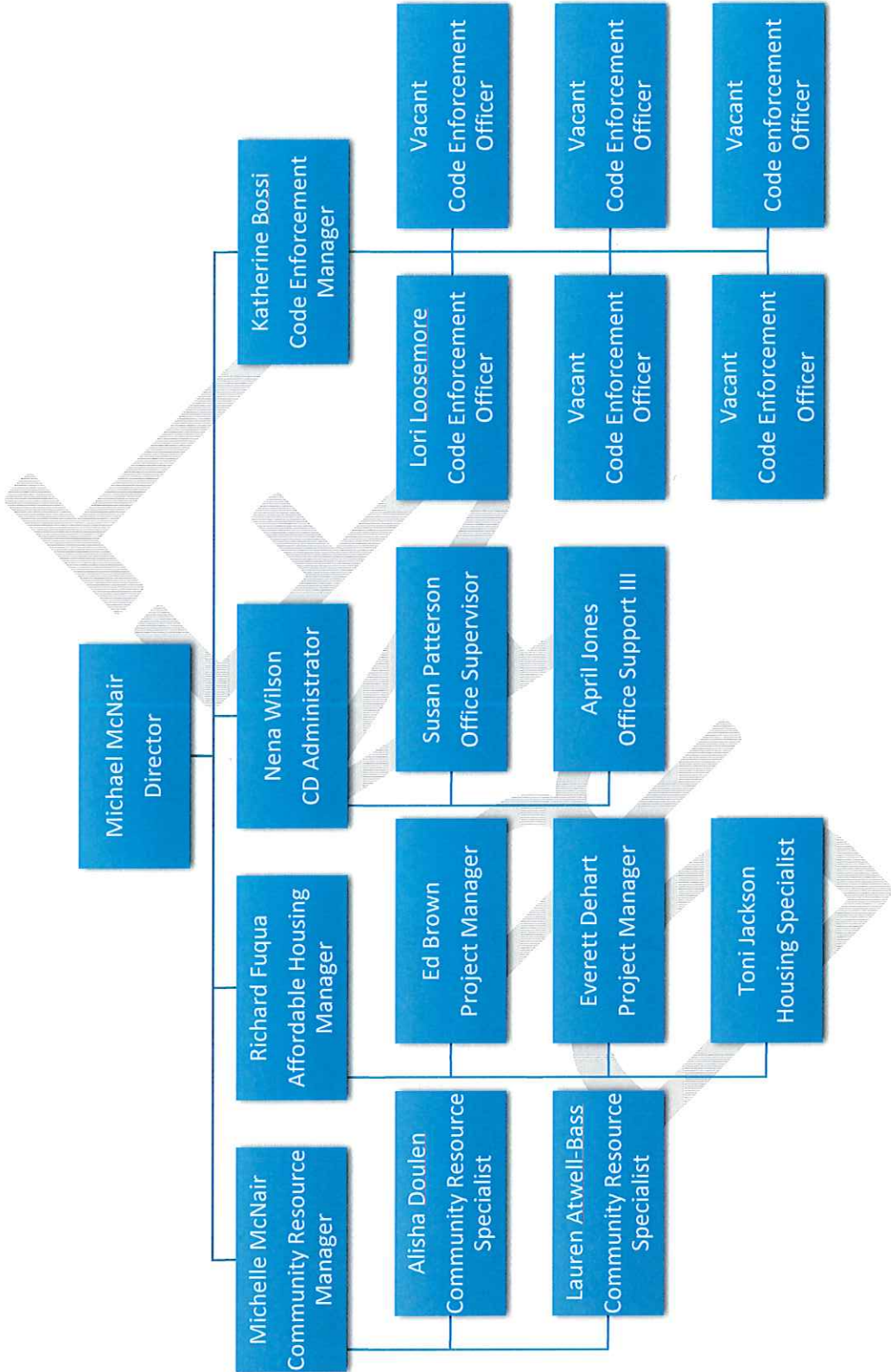
CD&H is responsible for program administration, monitoring, compliance and evaluation. The Department prepares the 5-year Consolidated Plan, the Assessment of Fair Housing and Fair Housing Action Plan, and the Annual Action Plan. CD&H also manages the citizen participation process; makes program documents available for public inspection/comment; assists the Citizens Advisory Council; and seeks City Council approval of the Action Plan. Each year the Department prepares a Consolidated Annual Performance and Evaluation Report³ (CAPER) to inform citizens of the use and impact of community development funds. CD&H staff provide progress reports to the City Manager, the Citizens Advisory Council and City Council. These reports include recommendations on reallocation of funds as appropriate. The Department's organization chart is shown on the next page.

¹ A five-year plan that describes a community's needs, resources, priorities, and proposed activities to be undertaken with HUD funding, primarily CDBG and HOME program funds. The Consolidated Plan is updated annually.

² A city which, based on factors such as its population, age of housing and poverty levels, is entitled to receive CDBG funds directly from HUD.

³ A CAPER reports how jurisdictions carried out housing and community strategies, projects and activities in the past year.

COMMUNITY DEVELOPMENT & HOUSING DEPARTMENT ORGANIZATIONAL CHART



A. Citizens Advisory Council

The Citizens Advisory Council (CAC), a nine-member volunteer board composed of city residents, plays a key role in the planning process. CAC members are appointed by the Mayor and City Council, and are limited to two consecutive two-year terms. The CAC was established in April 1974 to function as the primary citizen participation mechanism for projects planned and implemented with HUD funds. CD&H is responsible for providing administrative and technical support to the CAC. The CAC meets once a month; and all meetings are conducted in an open manner, with freedom of access for all interested persons. Current members are:

Jerry Mingo, Chair At-Large	Willie Davis, Ward 1
Julius Clark, Ward 2	Vacant, Ward 3
Vacant, Ward 4	Elizabeth Dennis, Ward 5
Scott Niebauer, Ward 6	Teresa Jones-Echard, At-Large
Perry Widemon, At-Large	Jeffery Golden, City Council Liaison

B. The Planning Process

Participation of the general public and of public organizations is extremely important to the development of the Annual Action Plan. To maximize citizen participation, CD&H staff conducts community meetings to discuss the planning process and solicit input. Community meetings are advertised in local newspapers at least 14 days in advance. This year's meetings were held as follows:

Washington Terrace Park	February 18, 2016
High Point Theatre	February 29, 2016

During these meetings, staff reviewed HUD national objectives as well as ongoing department activities, and facilitated a discussion of community needs along with suggestions for improving programs. Meeting with the community gives the department the best opportunities to interact with residents and receive feedback. Additionally staff regularly attends neighborhood group and association meetings in the Core City throughout the year which builds partnerships, maintains meaningful and productive relationships in the community, and enhances the Department's ability to develop responsive, relevant programs.

C. Public Hearings

Two public hearings will be conducted on the proposed Action Plan. The Citizens Advisory Council will conduct the first public hearing at 7:00 pm on Thursday, March 24, 2016 at City Hall, 3rd floor Conference Room, 211 South Hamilton Street, High Point. The second public hearing will be conducted by City Council during its regularly scheduled meeting on Monday, April 4, 2016, 5:30 pm, in City Council Chambers on the 3rd floor of City Hall, 211 South Hamilton Street.

D. Public Notice

The Community Development and Housing Department is making available a draft of the proposed 2016-2017 Annual Action Plan for public review and comment. The period of public review is for the required minimum of 30 days beginning March 17th ending April 18th, 2016. The proposed plan will be available for review at the following locations:

- Community Development & Housing Department, Room 312, City Hall, 211 S. Hamilton Street
- Community & Neighborhood Development Center, 201 Fourth Street
- High Point Public Library
- High Point Housing Authority, 500 E. Russell Street
- Macedonia Resource Center, 401 Lake Avenue
- West End Community Center, 903 English Road

The Annual Action Plan describes housing and community development activities proposed to be carried out by the City between July 1, 2016 and June 30, 2017 with a combination of HOME, CDBG Entitlement, program income, and local funds. The Plan also identifies other activities funded through North Carolina Housing Finance Agency, HUD Section 108, the Neighborhood Stabilization Program (NSP), and the IRS/Volunteer Income Tax Assistance Program. For more information, please call or write: Community Development & Housing Department, City of High Point, PO Box 230, High Point NC 27261 or visit our website at www.highpointnc.gov/cd. The City of High Point's meeting facilities are accessible to people with disabilities; those needing special accommodations may call (336) 883-3298 (voice) or (336) 883-8517 (TDD) to make prior arrangements.

E. Projected Sources of Funding

The CDBG program was created to plan and implement projects that foster revitalization of eligible communities throughout the United States. High Point is an Entitlement city, eligible to receive an annual CDBG allocation directly from HUD. Title I of the Housing and Community Development Act of 1974, as amended, is the legislation that authorizes the federal government to disburse block grant funds. The primary goal of this legislation is the development of viable urban communities. Program objectives include the provision of decent housing, a suitable living environment and expanded opportunities principally to benefit low to moderate-income individuals and families.

The City of High Point has been an Entitlement city for 42 years. CDBG-funded projects and activities must meet one of three broad national objectives. All of High Point's CDBG-funded activities in the Annual Action Plan meet at least one of these national objectives:

1. Benefit low and moderate income persons
2. Aid in the prevention and/or elimination of slums or blight
3. Meet community development needs having a particular urgency

HUD also allocates HOME program funding to assist in implementing affordable housing strategies that address local housing needs. This program strives to meet both the short-term goal of increasing the supply and availability of affordable housing and the long-term goal of building partnerships

between state and local governments and non-profit housing providers. It was created under the auspices of the National Affordable Housing Act of 1990. The HOME program affirms the federal government's commitment to:

- Provide decent, safe and affordable housing to all Americans
- Alleviate the problems of excessive rent burdens
- Alleviate and/or eliminate homelessness
- Eliminate deteriorating housing stock

Funds to operate the program are allocated by formula. Grantees must spend their allocations within five years, otherwise funds are subject to recapture by HUD. In the past the City of High Point received its HOME funds allocation as part of a consortium that included the cities of Greensboro and Burlington, as well as Alamance and Guilford counties. The City exited the Greensboro Consortium and gained its status as a Participating Jurisdiction⁴ in July 2005. The 2016-2017 Annual Action Plan represents the 11th year that High Point has been a Participating Jurisdiction, receiving HOME funds directly from HUD. Normally HUD requires a 25% cash match from the City; however, the City qualified for a match reduction according to HUD calculations this past year, and we anticipate a match reduction in the next fiscal year.

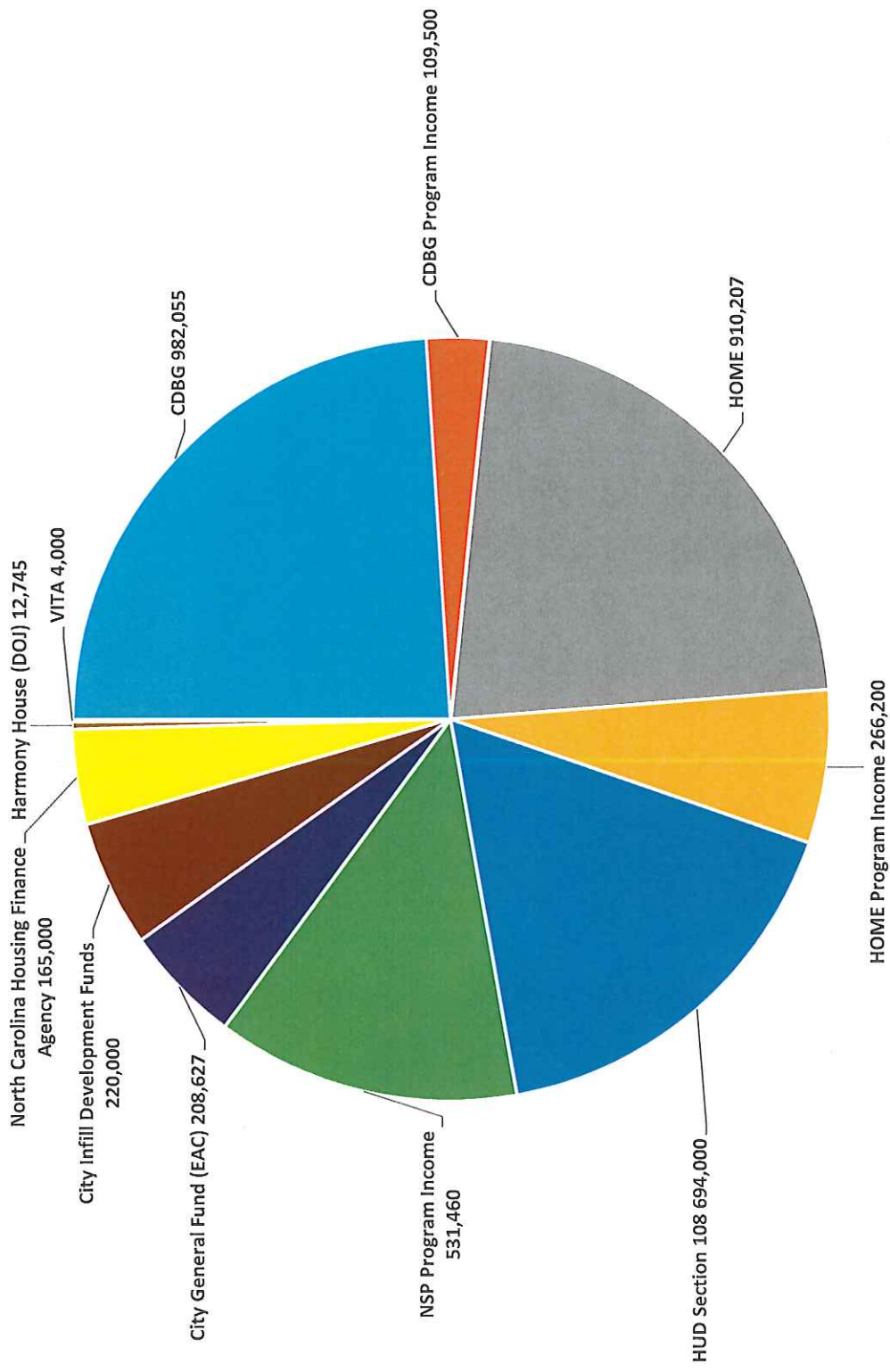
HUD regulations require the City to identify all resources expected to be available to implement activities identified in this Annual Action Plan. These funds, enumerated in Table 1 below, will be used to develop a coordinated, comprehensive approach to the core goals identified in the Plan.

⁴ HUD designation as a participating jurisdiction occurs if a State or local government meets funding thresholds, notifies HUD that it intends to participate in the program, and obtains approval by HUD of a Consolidated Plan.

Table 1. FUNDING SOURCES AND USES

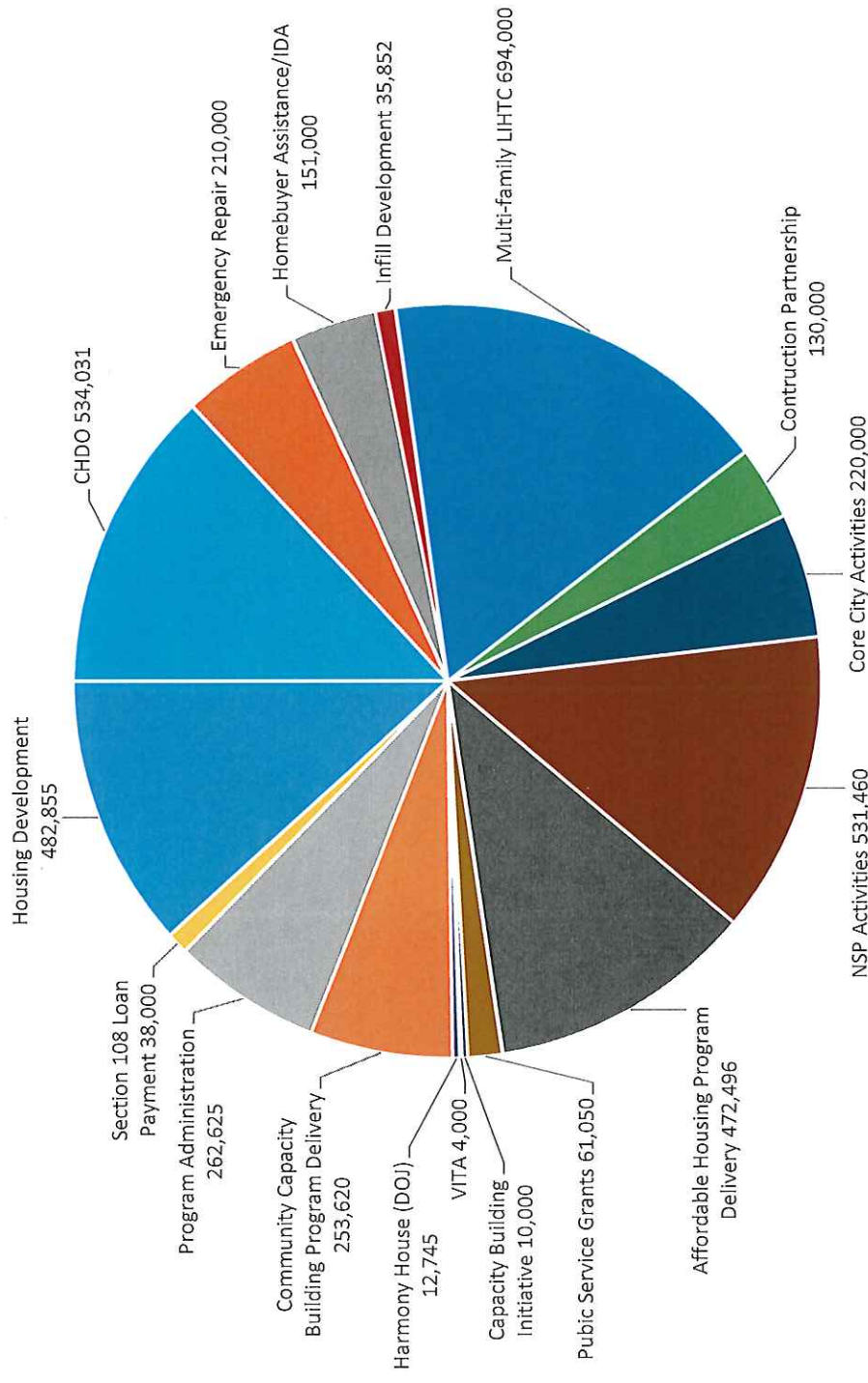
PROPOSED SOURCES		PROPOSED USES	
CDBG & CDBG Program Income (includes prior year funds)	1,091,555	Emergency Repair	210,000
HOME & HOME Program Income (includes prior year funds)	1,176,407	CHDO Activities	534,031
HUD Section 108 (Prior year funds)	694,000	Homebuyer Assistance/IDA	151,000
NSP Program Income	531,460	Housing/Infill Development	518,707
City Infill Development	220,000	Multi-family LIHTC	694,000
City General Fund (EAC)	208,627	Construction Training Partnership	130,000
North Carolina Housing Finance	165,000	Core City Activities/Homebuyer Incentive	220,000
VITA	4,000	Affordable Housing Program Delivery	472,496
Harmony House (DOJ-Prior year funds)	12,745	NSP Activities	531,460
		HUD Section 108 Loan Payment	38,000
		Public Service Grants	61,050
		Capacity Building Initiative (CBI)	10,000
		VITA	4,000
		Harmony House (DOJ)	12,745
		Community Capacity Building Program Delivery	253,620
		Program Administration	262,625
TOTALS	4,103,794		4,103,794

PROPOSED SOURCES OF FUNDING



The 2016-17 Annual Action Plan budget is illustrated in the chart above. HUD's CDBG and HOME funds provide the majority of funds used to provide affordable housing, neighborhood revitalization, emergency repairs, down payment assistance and community programs. Program income (loan repayment) is added to the budget as well. The City also provides salaries for two staff members, infill development funds, and some operating funds.

PROPOSED USES OF FUNDING



In accordance with HUD regulations, the Department designs and implements various affordable housing, community and neighborhood development strategies to meet identified needs.

Affordable housing strategies are designed to increase the supply of affordable housing, improve the condition of existing low-income housing stock, and enhance the accessibility of affordable housing to low-to-moderate income households.

Community and neighborhood development strategies focus on community capacity building, enhancing the provision of public services and assisting in the implementation of the Guilford County plan to eradicate homelessness.

F. Core City Housing Market Segmentation Study

The City of High Point engaged the Center for Housing and Community Studies (CHCS) at the University of North Carolina at Greensboro to conduct a “housing market segmentation” study for the purpose of providing data for prioritizing redevelopment and revitalization of the Core City of High Point, an area that has been plagued with blighted empty lots, vacant buildings, substandard housing, and whose residents have long experienced a lack of opportunity. The focus of the study is on three important and interrelated facets of housing in the Core City: the physical state of housing; the socio-demographic condition of neighborhoods; and the overall opportunity presented by careful market analysis.

While the existence of vacant and abandoned properties is often indicative of economic distress and disinvestment in a neighborhood, these properties must also be approached as more than just a symptom of these forces. Property abandonment is also a cause of disinvestment. Once there are a few vacant and abandoned properties in a neighborhood a cycle of disinvestment and decline sets in. This makes it vitally important to target investment and redevelopment efforts in areas with high concentrations of such properties. By definition, distressed properties present the surrounding communities with a variety of problems that have been divided into three general categories.

The areas under study in the Core City are some of the most segregated and impoverished neighborhoods in High Point. Poverty plays a significant part in ethnic segregation. Geospatial analysis of the region shows a picture of concentrations of poverty which intersect with concentrations of race/ethnic minorities resulting in an intergenerational lack of opportunity and little chance of upward social mobility. For example, segregated and impoverished areas result in “zones of denial” for mortgage applications, making it very difficult for those seeking to purchase affordable homes to obtain a mortgage. Such residential concentrations of a particular ethnic group combined with high rates of poverty may lead to the designation by the federal government as racial or ethnic concentrations of poverty or an “R/ECAP.” A third of the neighborhoods in this study have been designated as R/ECAPs. R/ECAPs are accompanied by factors that have negative consequences for the health of individuals and families. Five neighborhoods have greater than 61% of the population living in poverty. Many of the poorest neighborhoods have only limited access to amenities such as good schools, health care, or affordable and nutritious foods. Access to retail shopping and high quality child care is also quite limited in most of these areas. Combined with the relative lack of extensive public transit systems, persons living in such areas are greatly disadvantaged. Concentrated poverty itself becomes a significant impediment to fair housing choice because those living in such areas must spend far more time and money in order to purchase groceries or medicine, find opportunities for entertainment, or place their children in day care while working. Since employment opportunities are also limited in such areas, residents must commute outside their residential communities for virtually all of their daily needs.

The Center for Housing and Community Studies conducted primary data collection in the form of a parcel-level housing stock assessment for the Core City of High Point using Loveland Technologies software. CHCS collected data on over 15,000 parcels in the nine Census Tracts (32 Block Groups) of the Core City. The remote external assessment tool was used to enumerate the number and condition of the parcels indicating if they were occupied, vacant, abandoned, and the condition of structures on the properties. The data collected in the parcel assessment was matched with current data from the City of High Point (lists of condemned, vacant, and nuisance buildings, crime data, public services data, etc.) as well as information on community economic, demographic, and social conditions. ArcGIS was used to produce maps showing the Core City overlaid with geospatial data from various sources including: National Sources:

American Housing Survey, Decennial Census, American Community Survey, Home Mortgage Disclosure Act (HMDA), US Postal Service, ESRI data, HUD Tools, etc. Local Jurisdictional Sources: Guilford County tax records, Foreclosures (registrar of deeds), Crime data, Housing code enforcement data, Utility shut-offs, etc. In the final stage, data from our primary collections efforts were matched with other sources to create a geospatial market segmentation index. Market segmentation is a process of analysis that divides an area by natural geographic bounds as well as by demographic, social, economic, political, and cultural divisions. The result from analysis of all data is a housing stock profile for the City of High Point divided into five housing market categories:

1. **Stable Markets**

Stable neighborhoods were all located in the northwest of the City Core. Median home values are high, vacancy rates are low, and homeownership is high. Few homes are rated a substandard and few lots are empty.

2. **Functioning Markets**

Functioning neighborhoods were all located in the north and west of the City Core. Median home values are more moderate, vacancy rates are varied, and homeownership is moderate. More homes are rated a substandard and some lots are empty.

3. **Constrained Markets**

Constrained neighborhoods encircled the downtown area. Median home values are moderate, vacancy rates are higher, and homeownership is low. Homes are rated a substandard and many more lots are empty. Poverty and unemployment is higher.

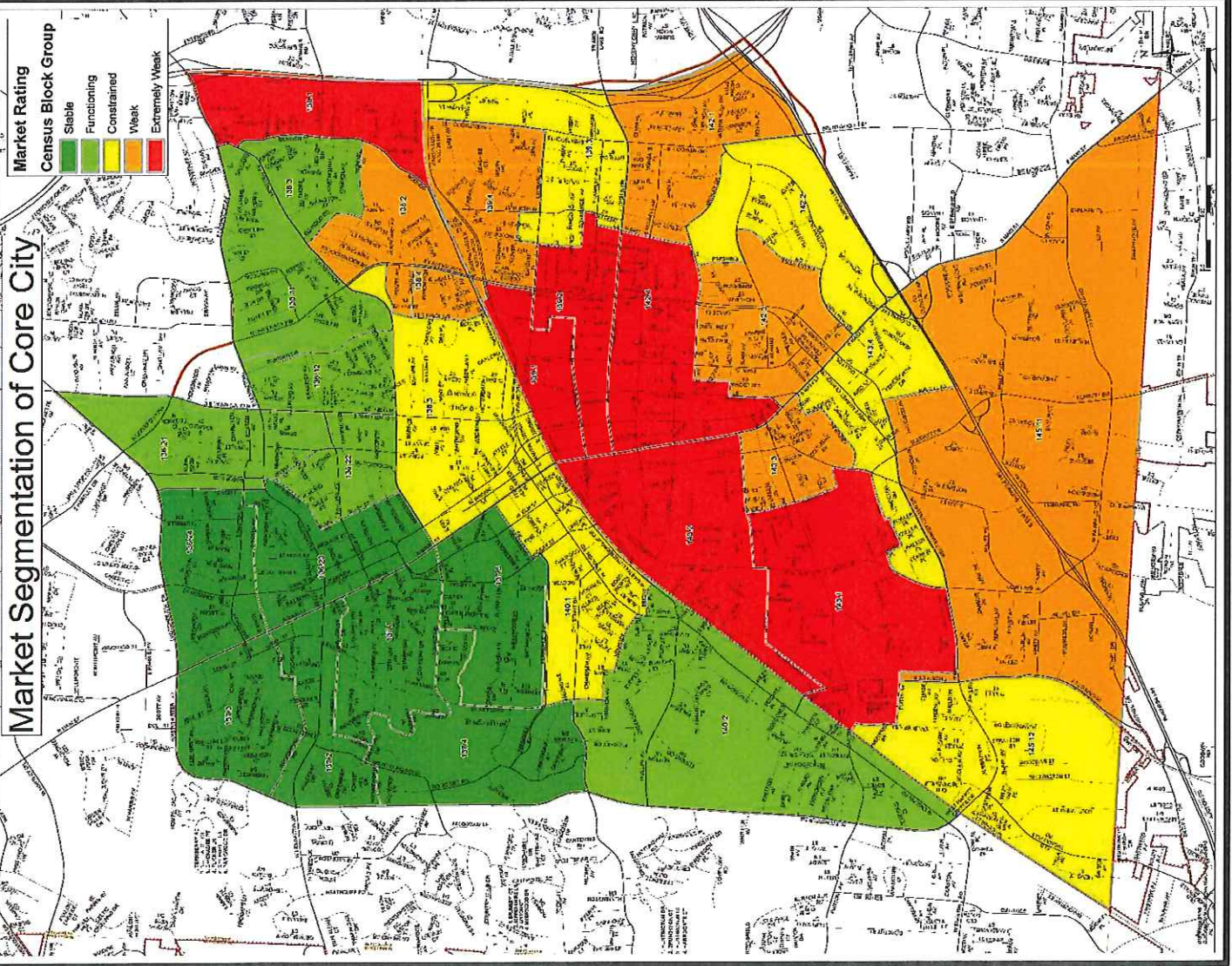
4. **Weak Markets**

Weak neighborhoods are scattered south and east of the City Core area. Median home values are low, vacancy rates are higher, and homeownership is low. Homes are rated a substandard and many lots are vacant. Poverty and unemployment is very high.

5. **Extremely Weak Markets**

Extremely Weak neighborhoods are concentrated in center of the City Core area. Median home values are the lowest, vacancy rates are highest, and rental rates are the highest. Many units are subsidized. Homes are rated a substandard and many lots are vacant. Poverty and unemployment is the highest.

Market Segmentation of Core City



The map illustrates the findings of the housing market segmentation study by census block group.

Recommendations

1. Action Items

- Use parcel-level assessment data collected by CHCS to identify individual opportunities: contiguous vacant lots, vacant buildings, moderate-severe fire damage, and ratings of poor or demo
- Examine opportunities identified in each neighborhood
- Look for "low-hanging fruit" such as: modest external repairs, side-lots, and delinquent taxes/ foreclosures
- Strategic demolition of vacant sub-standard building, acquisition of vacant parcels, and consolidation of multi-parcel packages for redevelopment (land-banking).
- Take advantage of assets that already exist and identified in the report.
- Promote ownership and investment in areas identified as having low owner-occupancy.
- Make infrastructure improvements that increase accessibility and aesthetic appeal of the residential and commercial districts.
- Match appropriate strategies with each market segment

2. Address housing, infrastructure, and business interests

- Encourage community involvement. Plan for charrettes with community: residents, landlords, community/neighborhood leaders, developers, investors, realtors, and housing/planning professionals.
- Explore public-private partnerships with private investors, as well as habitat and other non-profits to leverage limited resources

3. Improve Data

- Continue to develop additional instruments and tools to visualize neighborhood-level data for informed and targeted decision making (QoL Explorer).
- Develop property scoring matrix to prioritize investments
- Update data regularly to inform and target code enforcement

4. Budgeting

- Resources are required for targeted stabilization and code enforcement in weak and constrained markets while exploring long-term funding/financing for extremely weak markets (e.g. grant-writer).
- Most previous plans failed at implementation due to cost limitations
- Leverage private investment with federal and state funds to support affordable, mixed use, high density development.

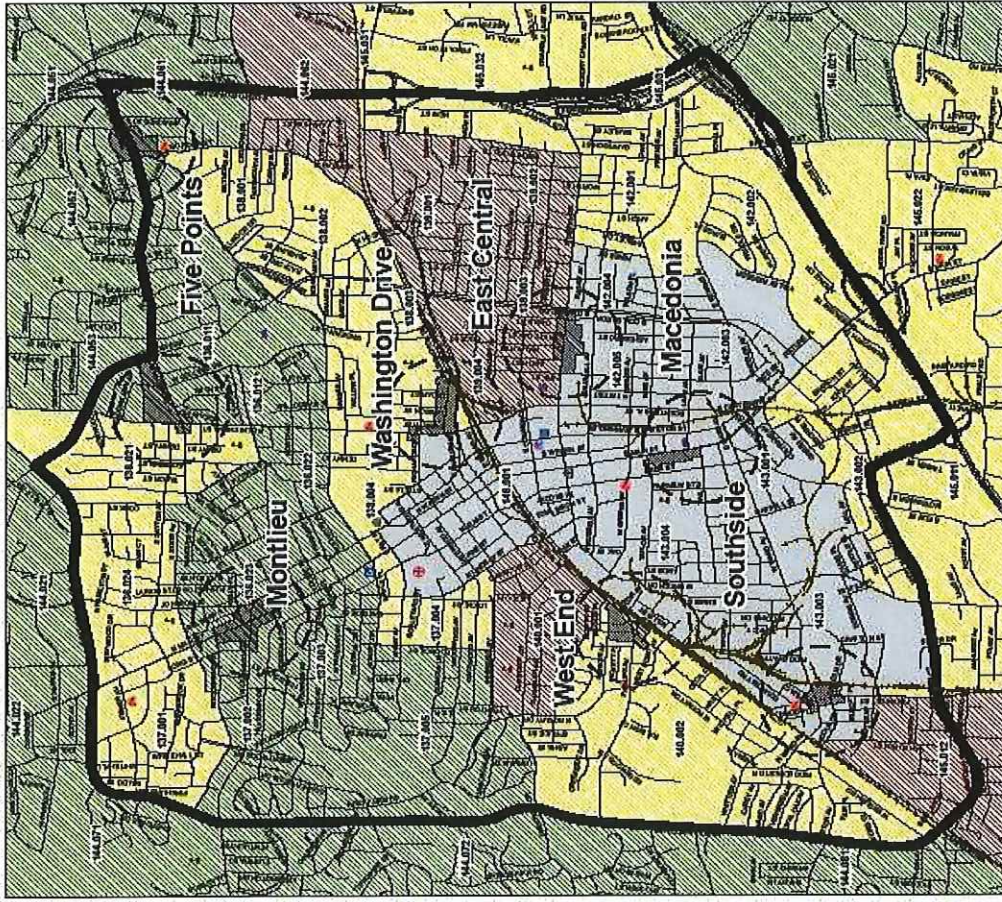
G. Neighborhood Revitalization Strategy Area (NRSA)

The extreme concentration of low-to-moderate income families in the heart of the Core City qualified High Point to obtain Neighborhood Revitalization Strategy Area (NRSA) designations for specific construction projects. This designation is possible due to HUD's desire to create communities of opportunity in distressed neighborhoods. Entitlement communities such as High Point may define a NRSA that meets the threshold for low/moderate income residents and is primarily residential. Within the NRSA the City receives much greater flexibility in the use of CDBG funds to stimulate the reinvestment of human and economic capital by economically empowering low-income residents. In order to enhance the impact of its community development programs in Core City neighborhoods, the Department successfully submitted an application for NRSA designation from HUD in specific Core City areas. The area submitted to HUD for NRSA approval is shown in grey on the map on the following page.

Continuing decline, widespread disinvestment in many communities, and the spillover effects in surrounding areas all point to the need for a different approach to rebuilding communities. HUD specifies that at least 70% of households in the NRSA must have low-to-moderate incomes, or LMI. The map on the next page depicts LMI household percentages in High Point by census block groups.⁵ Block groups in red have LMI percentages in excess of 70%; yellow areas have LMI percentages of 50-70%; green areas have LMI percentages of less than 50%. Clearly, the greatest concentration of LMI households is in the heart of the Core City. The NRSA designation will be used to enhance revitalization projects in the Macedonia and Southside communities.

⁵ A census block group is a subdivision of a census tract, and is the smallest geographic unit for which the Census Bureau tabulates 100% data. Many blocks correspond to individual city blocks bounded by street but blocks, especially in rural areas, may include many square miles and may have non-street boundaries.

Low / Moderate Percentages by Block Group



The purple/grey areas shown on this map show the boundaries of the NRSA in the City of High Point.

H. Income Guidelines

HUD is required by law to set income limits in determining eligibility of applicants for assisted housing programs which use HUD funds. The income guidelines provided to High Point reflect incomes for the Greensboro-High Point Metropolitan Statistical Area (MSA).⁶ The table below contains FY2015 income limits with breakdowns by family size and income categories for High Point. These guidelines form the basis of eligibility criteria for the City's CDBG and HOME- funded projects. According to the 2015-2019 Consolidated Plan, High Point families with incomes at or below 30% of the area median income are at the greatest risk for housing problems.

2015 Income Levels (Source: HUD)				
	Extremely Low Income	Very Low Income	Low Income	Area Median Income
Persons in Household	30% Median	50% Median	80% Median	100% Median
1	\$11,770	\$18,900	\$30,250	\$37,800
2	\$15,930	\$21,600	\$34,600	\$43,200
3	\$20,090	\$24,300	\$38,900	\$48,600
4	\$24,250	\$27,000	\$43,200	\$54,000
5	\$28,410	\$29,200	\$46,700	\$58,350
6	\$31,350	\$31,350	\$50,150	\$62,650
7	\$33,500	\$33,500	\$53,600	\$67,000
8	\$35,650	\$35,650	\$57,050	\$71,300

These families also have the greatest risk of exposure to lead-based paint hazards. The 2015 Median Family income in High Point is \$54,000. Census median family income (MFI) estimates are updated with county-level Bureau of Labor Statistics earnings data and Census American Community Survey (ACS) state-level MFI estimates or ACS local area MFI estimates. Separate HUD MFI estimates are calculated for all MSAs and nonmetropolitan counties. HUD uses the Section 8 program's Fair Market Rent (FMR) area definitions in developing median family income estimates for a given area. HUD income limits are calculated for every FMR area with adjustments for family size and for areas with unusually high or low income-to-housing cost relationships. HUD sets income limits to determine eligibility for each Entitlement's programs and services. FY 2015 MFI estimates are based on data generated from the census for a particular community, and are updated annually.

⁶ The US Office of Management and Budget designates MSAs according to published standards that are applied to Census Bureau data. The general concept of MSAs is that of a core area containing a substantial population nucleus, together with adjacent communities having a high degree of economic and social integration with that core area.

I. Fair Market Rents and Affordable Housing

Fair market rents are set annually by HUD to identify the amount needed to rent modest housing in an area.⁷ They are affordability indicators of the general housing market for an area. One way to evaluate rental-housing costs is to compare the Housing Wage⁸ to the estimated mean rental wages⁹. According to the National Low Income Housing Coalition, the Fair Market Rent (FMR) for a two bedroom apartment is \$741. In order to afford this level of rent and utilities---without paying more than 30% of income on housing---a household must earn \$2,470 monthly or \$29,640 annually. Assuming a 40-hour work week, 52 weeks per year, 2080 hours, this level of income translates into a housing wage of 14.25/hour¹⁰.

The minimum wage in North Carolina is \$7.25. To afford the FMR for a two bedroom apartment, at minimum wage a worker must work roughly 85 hours per week, 52 weeks per year. Or a household must include 2 minimum wage earners working a little more 40 hours per week year-round to be able to afford an apartment at Fair Market Rent rates. In North Carolina the estimated housing wage for a renter is \$14.68. In order to afford the FMR for a two bedroom apartment at this wage (\$14.68/hour), a renter must work 42 hours per week, 52 weeks per year.

Lower income families in High Point have great difficulty securing affordable housing and are driven toward older neighborhoods where housing stock is often not well maintained. Housing quality and affordability are intertwined, with one factor often forcing the acceptance of undesirable levels of the other. Low-income families who are unable to afford market rate rents are also unable to access Section 8 vouchers and often find themselves with housing cost burdens that force choices between paying the rent, paying the utilities, buying food, or paying for health needs/expenses. Often the poor opt to cut back on medicine, resulting in decreased quality of life and ultimately higher health care costs for them and the community at large, eventually. The inability to pay market rents forces low income families to seek lower cost and lower quality housing in older homes of Core City neighborhoods. Since Core City neighborhoods have the greatest concentration of older housing and consequently the greatest threat of lead poison contamination, a vicious cycle is put in motion which forces low income families to accept low quality housing which is all they can afford, exposing them to hazardous living conditions.

FY2016 Fair Market Rents (source: Federal Register)

	1 bedroom	2 bedroom	3 bedroom	4 bedroom
\$538	\$637	\$741	\$1,003	\$1,185

⁷ It also establishes the maximum rent that could be provided for Section 8 recipients.
⁸ A "housing wage" is a term used to describe the average hourly wage needed to rent a two-bedroom dwelling at fair market rent.
⁹ Estimated mean renter wage is based on Bureau of Labor Statistics data and adjusted using the ratio of renter to total household income reported in the 2000 census.
¹⁰ The hourly wage needed to afford (at no more than 30% of gross income) a 2-bedroom apartment at Fair Market Rent.

III. Affordable Housing Activities

According to the City's 2015-2019 Consolidated Plan, 74% of extremely low-income, and again nearly three-quarters (74%) of very low-income households in High Point experience one or more housing problems. Households with housing problems are those households occupying units without a complete kitchen or bathroom, that contain more than 1.5 persons per room, or that pay more than 30-50 percent of their income to cover housing expenses. More than one-quarter of all households in our community (at any income level) experience a housing problem, and nearly one-third (31%) experience a cost burden of 30-50 percent. Many very low-income and extremely low-income individuals experience severe cost burdens. Sixteen percent (16%) of all households in High Point experience a cost burden of 50 percent or more. The availability of affordable housing is a local, as well as national issue. The National Low Income Housing Coalition's 2016 State of Housing Profile for North Carolina cites a shortage of 213,782 units of affordable and available housing for extremely low income renters.

Many low-income families in High Point are faced with multiple undesirable choices when seeking housing. They must choose between paying more than they can afford, living in substandard housing, or living in overcrowded housing. These choices have corresponding negative impact in their quality of life. The scarcity of affordable housing in our community is reflected in the extreme concentration of low-income families in older areas of the Core City and in the substantial waiting list maintained by the High Point Housing Authority.

While no estimate of lead-based paint risk by income level is available, households with incomes below 50% of the AML are least able to afford new, well-maintained housing and are therefore at a greater risk of lead poisoning. Lead-based paint risk is highest in units built prior to 1980 with children present. One-tenth of both owner- and renter-occupied housing falls within this category, for a total of 3,917 units at risk for exposure to lead in High Point.¹¹

In response to housing needs identified in the Consolidated Plan, Community Development & Housing's affordable housing strategies are focused in three areas (programs in response to these areas are given below each area):

- Increasing the supply of safe, sanitary and decent affordable housing (single family and multifamily housing development)
 - Infill development through partnership with non-profit developers (CHDOs)
 - Partnership with multifamily housing developers in support of LIHTC projects (e.g., Admiral Pointe)
 - Neighborhood Stabilization Program (NSP) to acquire and repair vacant foreclosed properties and sell to income-eligible persons
- Improving the condition of the existing low income housing stock (housing rehabilitation)
 - Lead Hazard Control (remediate lead-based paint hazards)
 - Southside Revitalization
 - Emergency Repair (associated with Lead Hazard Control)
- Improving the accessibility to affordable housing (homebuyer education and down payment assistance)
 - Homebuyer Education
 - Down Payment Assistance
 - Individual Development Accounts

¹¹ Data Source: 2007-2011 ACS (Total Units) 2007-2001 CHAS (Units with Children present)

A. PROPOSED ACTIVITIES FOR THE 2016-2017 PROGRAM YEAR
PROJECT/PROGRAM: Emergency Repair (CDBG-ER)

Rehabilitation of the City's aging housing stock is geared towards ensuring the continued livability and viability of High Point's limited affordable housing units. The City will continue to allot and administer CDBG funds through the City's Emergency Repair Program to serve households at 80% AMI or below.

This program is intended to provide quick action to eligible homeowners in response to a housing failure that may endanger their safety or health or meet other imminent repair needs.

Eligible repairs include the following:

- Combustion appliance and chimney hazards
- Electrical/plumbing system hazards
- Imminent structural system failures (e.g. failing porches and steps, and roofing)
- Mitigation of environmental hazardous substances such as lead-based paint, asbestos contamination or soil gas intrusion
- Repairs necessary to prevent the imminent displacement of eligible households
- Repair designed to increase the accessibility of the unit to frail or disabled residents including ramps, hand rails, grab bars, kitchen and bathroom adaptations and door alterations, etc.
- Imminent threats to life or safety

Accordingly, the Department closely monitors clients' income and asset eligibility criteria to focus resources on the lowest income groups. The City will continue to act on the owner's behalf to ensure repairs are performed properly and that customer expectations are met. Administrative and professional services afforded to the property owner will include:

- Intake and qualification of applicants
- Inspection and assessment of required repairs
- Preparation of the work write-up
- Managing the bid-letting process
- Compliance with HUD and local regulation
- Supervision of work and payment of contractors

Agency funded, if applicable: N/A

Eligibility citation: 24 CFR 570.202(a)(1)

Estimated funding amount: \$100,000 (CDBG)

Target area: Citywide (with a focus on Core City)

Need addressed (access to affordable housing, homelessness, public services, etc.): Improved sustainability of affordable housing

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of homes rehabilitated: 15

PROJECT/PROGRAM: Emergency Repair (URP)

Rehabilitation of the City's aging housing stock is geared towards ensuring the continued livability and viability of High Point's limited affordable housing units. The City applied for and received an Urgent Repair Program (URP) grant administered by the North Carolina Housing Finance Agency. The Urgent Repair Program funds are intended to provide quick action to households at 50% AMI or below (at least half of the projects must assist households at 30% AMI or below) with urgent housing repairs or to meet an imminent housing need as defined in the program guidelines. Repairs can be performed in conjunction with other non-Federally financed programs such as the City's Construction Training Partnership program.

Eligible repairs include the following:

- Combustion appliance and chimney hazards
- Electrical/plumbing system hazards
- Imminent structural system failures (e.g. failing porches and steps, roofing, etc.)
- Mitigation of environmental hazardous substances such as lead-based paint, asbestos contamination or soil gas intrusion
- Repairs necessary to prevent the imminent displacement of eligible households
- Repair designed to increase the accessibility of the unit to frail or disabled residents including ramps, hand rails, grab bars, kitchen and bathroom adaptations and door alterations, etc.
- Imminent threats to life or safety

Accordingly, the Department closely monitors clients' income and asset eligibility criteria to focus resources on the lowest income groups. The City will continue to act on the owner's behalf to ensure repairs are performed properly and that customer expectations are met. Administrative and professional services afforded to the property owner will include:

- Intake and qualification of applicants
- Inspection and assessment of required repairs
- Preparation of the work write-up
- Managing the bid-letting process
- Compliance with HUD and local regulation
- Supervision of work and payment of contractors

Agency funded, if applicable: N/A

Eligibility citation: N/A

Estimated funding amount: \$100,000 (NCHFA); \$10,000 match (General Fund)

Target area: Citywide (with a focus on Core City)

Need addressed (access to affordable housing, homelessness, public services, etc.): Improved sustainability of affordable housing

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of units rehabilitated: 20

PROJECT: Construction Training Partnership (CTP) Program

The City entered into a tri-party agreement with the N. C. Housing Finance Agency (NCHFA) and the N. C. Homebuilders Association (NCHBA) to provide occupational training to City residents and to build/renovate affordable housing. The City will pay the soft costs associated with training at an amount not to exceed \$65,000. NCHBA will conduct a range of training services that shall consist of no less than two, eight-week construction classes, consisting of classroom and hands-on residential new construction and/or rehabilitation field training followed by job placement activities. NCHFA will pay the hard costs of eligible program-related new construction or rehabilitation activities at an amount not to exceed \$65,000. The City will identify and select eligible residential construction projects to serve as class related field laboratories and instructional models. The City will choose new and/or rehabilitation projects with a sufficiently broad scope of work so as to allow students the widest possible variety of construction training exposures and experiences.

The City has procured a general contractor partner [High Point Committee Against Violence ("HPCAV")] who will be responsible for the satisfactory completion of all work performed by participants on program-related projects. The City will work with HPCAV to schedule work commensurate with the training needs of each class. The City will administer disbursement of NCHFA-provided funds, maintain accurate and detailed records of all eligible program-related transactions, and report to the Agency as required by this agreement.

The City has contracted with two of its partners to provide CTP graduates with additional hands-on experience in rehabilitation as well as new construction techniques. HPCAV will continue its work with CTP graduates to gain valuable experience in rehabilitation techniques that will benefit low- and moderate-income households. In addition, the City has entered into a contract with Habitat to provide new construction experience in the form of an eight-week apprenticeship. Apprentices will assist in bringing homes being built by Habitat to completion faster.

Agency funded, if applicable: HPCAV

Eligibility citation: N/A

Estimated funding amount: \$130,000.00 (\$65,000 from NCHFA; \$65,000 from General Fund)

Target area: Citywide

Need addressed (access to affordable housing, homelessness, public services, etc.): Improved accessibility to affordable housing

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of CTP participants: 20 (2 classes @ 10 students/class)

of CTP graduates: 18

of rehabilitated homes: 10

of new homes assisted: 6 (including Blitz building)

PROJECT: Community Housing Development Organization (CHDO)

CHDOs are nonprofit organizations whose purpose is to provide decent and affordable housing for low- to moderate-income persons. The City is required to set aside at least fifteen percent (15%) of its HOME funds for CHDO activities. Currently, the City has two active certified CHDOs: Habitat for Humanity of High Point, Trinity and Archdale; and Community Housing Solutions.

Since 2008, CD&H has contracted with Habitat to build 27 single family homes in the neighborhood adjacent to Washington Terrace Park, as well as the West End neighborhood. Habitat has constructed and sold 1 home in West End and 23 homes in the Graves Avenue area, with an additional 3 currently underway.

In the Southside neighborhood, CD&H previously contracted with Unity Builders, Inc. to construct and sell 7 single-family homes, as well as construct 4 homes for lease-purchase. In 2015, CD&H executed a contract with Community Housing Solutions (CHS) to construct 2 single family homes in the Southside community. Once these homes are sold or otherwise occupied by lease-purchasers, CD&H proposes to partner with CHS to build 3 additional homes for sale or lease-purchase, which would complete Phase 1 of the Southside Revitalization Plan.

Agency funded, if applicable: Habitat for Humanity of High Point, Trinity and Archdale; Community Housing Solutions

Eligibility citation: 24 CFR 92.300

Estimated funding amount: \$534,031 (\$504,031 for home construction and \$30,000 for operating support)

Target area: Southside & Washington Terrace

Need addressed (access to affordable housing, homelessness, public services, etc.): Improved access to affordable housing

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of homes constructed: 9

of LMI households served: 9

PROJECT/PROGRAM: Homebuyer Assistance/Individual Development Accounts

Homebuyer assistance is vital to the Department's goal of providing access to decent, safe, sanitary and affordable housing. The Citywide homebuyer assistance program provides down payment and closing cost assistance to homebuyers to reduce out of pocket costs in the form of a deferred low-interest rate loan. Homebuyer assistance is offered to buyers who purchase homes in the city limits of High Point. Homebuyer assistance is up to \$5,000 that can be used for closing costs and/or down payment assistance. The department offers additional incentives to homebuyers who purchase in targeted

neighborhoods throughout the city. These assistance packages are designed to attract homebuyers to these neighborhoods.

Basic program requirements include:

- Completion of an 8-hour Homebuyer Education class offered by a HUD-approved Housing Counseling Agency sponsored by CD&H;
- Obtaining a loan to purchase the house from a [participating lender](#);
- Meeting income eligibility requirements established for the program;
- Purchasing a home within the city limits of High Point;
- Post-purchase counseling consisting of two, 2-hour individual counseling sessions within the first 12 months of ownership, and;
- A minimum cash investment of \$500 toward the home purchase.

Homebuyers meeting these basic program requirements are assisted during the homebuyer process by various professionals who demonstrate an interest in ensuring homebuyers obtain decent, safe, sanitary and affordable housing.

HUD defines “affordable” as housing that costs no more than 30 percent of a household’s monthly income. Since 2009, the federal minimum wage has been \$7.25 per hour. Thus, a worker who earns the current minimum wage of \$7.25 per hour should pay no more than \$377.00 per month for rent and basic utilities, an amount that does not cover the rent on a sanitary and decent one-bedroom apartment in any county in America¹². According to the North Carolina Housing Coalition, a worker needs a wage of \$13.54 per hour or \$2,347 a month to afford a two-bedroom apartment in High Point, North Carolina¹³. Increased home prices and rents have pushed the dream of home ownership out of reach for many of the City’s working poor. Our programs are designed for those who are able to afford the monthly payment, but who do not have access to funds for the down payment or closing costs required. This barrier to entry is where the City’s programs aid in increasing access to affordable housing. As the economy improves, we anticipate increased demand for homebuyer assistance.

Section 92.254(a)(2)(iii) of the Final Rule published on July 24, 2013, HUD established new homeownership value limits for the HOME Participating Jurisdictions (PJs). This new Rule was effective August 23, 2013.

- **Newly Constructed Housing.** The new HOME homeownership value limits for newly constructed HOME units is the greater of (a) 95% of the median purchase price for the area based on Federal Housing Administration (FHA) single family mortgage program data for newly constructed housing or (b) the minimum limit or floor established by HUD based on 95% of the U.S. median purchase price for new construction for nonmetropolitan areas. For the Greensboro-High Point Metro Area, the maximum homeownership value for newly constructed housing is \$200,000 effective April 13, 2015.

¹² Out of Reach 2015, National Low Income Housing Coalition (2016)

¹³ The hourly wage needed to afford, at no more than 30% of gross income, a 2-bedroom apartment at Fair Market Rent. [SOURCE: Out of Reach 2015, National Low Income Housing Coalition (2016)]

- **Existing Housing.** The new HOME homeownership value limits for existing HOME units is the greater of (a) 95% of the median purchase price for the area based on Federal FHA single family mortgage program data for existing housing and other appropriate data that are available nationwide for sale of existing housing in standard condition or (b) the minimum limit or floor established by HUD based on 95% of the statewide nonmetropolitan area median purchase price using this data. For the Greensboro-High Point Metro Area, the maximum homeownership value for existing housing is \$149,000 effective April 13, 2015.

Homebuyer Education Eligibility

Homebuyer education workshops use a HUD-approved curriculum, *Neighborworks' Realizing the American Dream of Homeownership*¹⁴. Workshops are offered monthly at rotating locations throughout High Point to assist future first-time homebuyers with the home purchasing process. Locations include the Southside Recreation Center, Morehead Recreation Center, Oakview Recreation Center, Greater First United Baptist Church, Roy B. Culler Senior Center and the Community & Neighborhood Development Center.

A HUD-approved housing counseling agency will partner with the City of High Point to offer this valuable training. The classes are eight hours in length, free to the public and all participants receive a certificate when completed. The classes comprehensively cover the home purchasing process. Topics covered include a homeownership overview, financing a home, budgeting, saving and credit counseling, working with a real estate professional, predatory lending, fair housing, home maintenance, and foreclosure prevention.

Lender/Realtor Participation

To extend partnerships and enhance homeownership, the City has partnered with local realtors and lenders to help homebuyers obtain an affordable first mortgage. The Department conducts free certification workshops for realtors and mortgage providers to become Participating Lenders/Realtors for the Homebuyer Assistance Programs. These certification workshops provide a common groundwork to help streamline the application process¹⁵ and facilitate the access of low- to moderate-income families to affordable mortgage products. Participating lenders agree to provide non-predatory mortgage practices to households receiving down payment assistance from the City in accordance with guidelines established by the Community Reinvestment Association of North Carolina (CRA-NC)¹⁶. The Community Development & Housing website maintains a list of local Real Estate agents who receive training and commit to dedicate their time and effort to assisting low- to moderate-income homebuyers obtain fair, decent and affordable housing.

Individual Development Accounts

¹⁴ The HUD-approved curriculum, *Realizing the American Dream Trainer's Manual, 4th Edition* and its complementing *Homebuyer's Manual* are the definitive resources for homebuyer training and education.

¹⁵ Since the participating lenders agree to submit downpayment and closing costs assistance packages to the Department, prospective homebuyers will only have to fill out one application for approval.

¹⁶ The Community Reinvestment Association of North Carolina's mission is to promote and protect community wealth. They advocate for change in the lending practices of financial institutions to promote wealth building for underserved communities and to end predatory lending practices that strip wealth.

Individual Development Accounts (IDAs) are part of an asset-building strategy that concentrates on building family security by improving long-term economic well-being and emphasizing beneficial behaviors rather than merely offering temporary assistance.¹⁷ The homebuyer makes regular, monthly contributions to their IDA account that is then matched up to \$2,000 with private and/or public resources. IDAs can be used to reward the monthly savings of working-poor families who are building towards purchasing an asset (most commonly buying their first home), paying for post-secondary education, or starting a small business. The City's focus with the IDA program will be on home ownership. IDAs are savings accounts established in the homebuyer's name, held at local financial institutions, and usually managed by a community organization. CD&H records indicate that most graduates of the Homebuyer Education Program have not purchased a home over the last five years. This indicates that additional financial training is needed to help potential low-to-moderate income homebuyers in High Point. To improve opportunities for homeownership, the City will partner with Housing Consultants Group (HCG) to continue an IDA program specifically for High Point. Monthly classes complement required one-on-one counseling sessions to effectively assist participants in reaching their homeownership goals. Two classes will be staggered six (6) months apart during the fiscal year. Financial literacy classes will be held at the High Point Library, targeting potential homebuyers who have attended the homebuyer education classes, but who also realize that they need additional training and assistance in financial management.

In response to the higher lending standards as a result of the 2008 economic downturn, the Department determined the IDA Program needed to increase its focus on spending patterns, the ability to maintain a monthly budget, the ability to save money monthly, and the establishment of an emergency fund to enhance the homebuyer's ability to secure a mortgage. The habit of saving and planning for unexpected events is imperative to the future success of the IDA graduates. In an effort to allow for other innovative housing opportunities, HCG along with CD&H will continue to market homes acquired through the Neighborhood Stabilization Program and HOME funds to potential homeowners who receive education through IDA. Families participating in CHDO-sponsored Lease Purchase and Habitat for Humanity's new construction programs have also been identified as IDA participants. The IDA program provides these families with the tools necessary to become mortgage ready by lease end.

Agency funded, if applicable: Housing Consultants Group (HCG)

Eligibility citation: 24 CFR 570.201(k)

Estimated funding amount: \$151,000.00 (\$100,000 for Down Payment Assistance; \$21,000 for Homebuyer Training; \$30,000 for Individual Development Account)

Target area: Citywide

Needs addressed (access to affordable housing, homelessness, public services, etc.): Improved access and housing affordability

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted): Each monthly homebuyer education class has the potential to educate up to 25 families (300 per year). Each of the two IDA classes has the potential to position up to 25 families to become

¹⁷ According to the NC Housing Coalition, the idea for Individual Development Accounts (IDA) was created by author Michael Sherraden in his 1992 book, *Assets and the Poor*. It was further advanced by the Corporation for Enterprise Development in the mid 1990 s. One half of all Americans own less than \$1,000 in net financial assets, and one third of American children grow up in households with zero or negative financial assets.

mortgage-ready. (50 per year).

PROJECT: Core City Homebuyer Incentive Program

In November 2014, City Council approved a pilot program to provide down payment and closing cost assistance to encourage middle income homebuyers to buy homes in the defined areas of the Core City. Initially, loan terms offered a repayment deferment for 3 years with an interest rate of 3% and a 5-year term. Depending on the location and needs of the borrower, the amount of assistance could total up to \$7,500. The property must be owner occupied and their primary residence.

However, in November 2015, to better position our program with the NCHFA's Hardest Hit Downpayment Assistance Program, City Council revised the program to include a zero percent interest, deferred and forgiven loan with 5-year terms. The \$7,500 loan will be forgiven at a rate of 20% each year the buyer maintains the home as their primary residence.

Modeled after our Citywide Homebuyer Assistance Program, the basic program requirements include:

- Completion of an 8-hour Homebuyer Education class;
- Obtaining a loan to purchase the house from a participating lender;
- Purchasing a home within eligible areas of the Core City of High Point;
- Sales price not to exceed \$200,000;
- Post-purchase counseling consisting of two, 2-hour individual counseling sessions within the first 12 months of ownership; and
- A minimum cash investment of \$500 toward the home purchase.

Agency funded, if applicable: N/A

Eligibility citation: N/A

Estimated funding amount: \$120,000 (\$100,000 for down payment assistance; \$20,000 for homebuyer education classes)

Target area: Core City

Need addressed (access to affordable housing, homelessness, public services, etc.): Income diversification in the Core City

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of homebuyers assisted: 13

of homebuyer education class attendees: 13

PROJECT: Core City Activities

CD&H proposes to utilize CDBG allocations from this year and prior years to perform the following activities, individually or in combination:

- Facilitate two, one-day sessions of the program Operation Inasmuch in High Point. Operation Inasmuch, managed by Community Housing Solutions in partnership with Housing Consultants Group and local churches, utilizes volunteer labor to perform beautification and rehabilitation services for income-eligible homeowners in targeted neighborhoods. (Goal: 15 homes; budget: \$80,000);
- Acquire blighted properties and land bank for future housing development (Goal: 10 units; budget: \$150,000); and/or
- Acquire foreclosed properties that will be repaired and sold via the lease-purchase program to income-eligible homebuyers. (Goal: 2 units; budget \$100,000)

Agency funded, if applicable: N/A

Eligibility citation:

Estimated funding amount: \$100,000

Target area: Core City

Need addressed (access to affordable housing, homelessness, public services, etc.): Access to affordable housing

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefited):

of lots acquired for future redevelopment: 10

of homes acquired/rehabilitated: 17

PROJECT/PROGRAM: Infill Housing Development

The City facilitates development of affordable housing by identifying project sites, procuring property, conveying lots and providing gap financing to non-profit builders in order to leverage and attract market rate construction financing from local banks.

CD&H receives an annual allocation from the General Fund to support affordable housing activities. CD&H proposes to use available funding to support the following:

- Construction Training Partnership (CTP) Program (\$65,000) – see CTP section for more details
- Core City Homebuyer Assistance Program (\$120,000) – see Core City Homebuyer Assistance Program section for more details
- Urgent Repair Program (\$10,000) – Match for \$100,000 NCHFA funding (see Emergency Repair section for more details).

- Other Housing Activities (\$50,000) – Urgent repairs, strategic acquisitions, demolition, etc. Properties that are acquired/demolished will be made available to Community Housing Development Organizations (CHDOs) for future new construction of affordable housing (see CHDO section for more details).

Agency funded, if applicable: Various

Eligibility citation: 24 CFR 570.202, 92.205

Estimated funding amount: \$518,707

Target area: Neighborhoods where our housing development efforts are targeted within the Core City as well as the City's Neighborhood Revitalization Strategy Area (NRSA) designated boundaries.

Needs addressed (access to affordable housing, homelessness, public services, etc.): To provide decent, safe and affordable housing opportunities and to improve neighborhood conditions

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

*See sections referenced above for goal outcomes.

PROJECT/PROGRAM: Neighborhood Stabilization Program

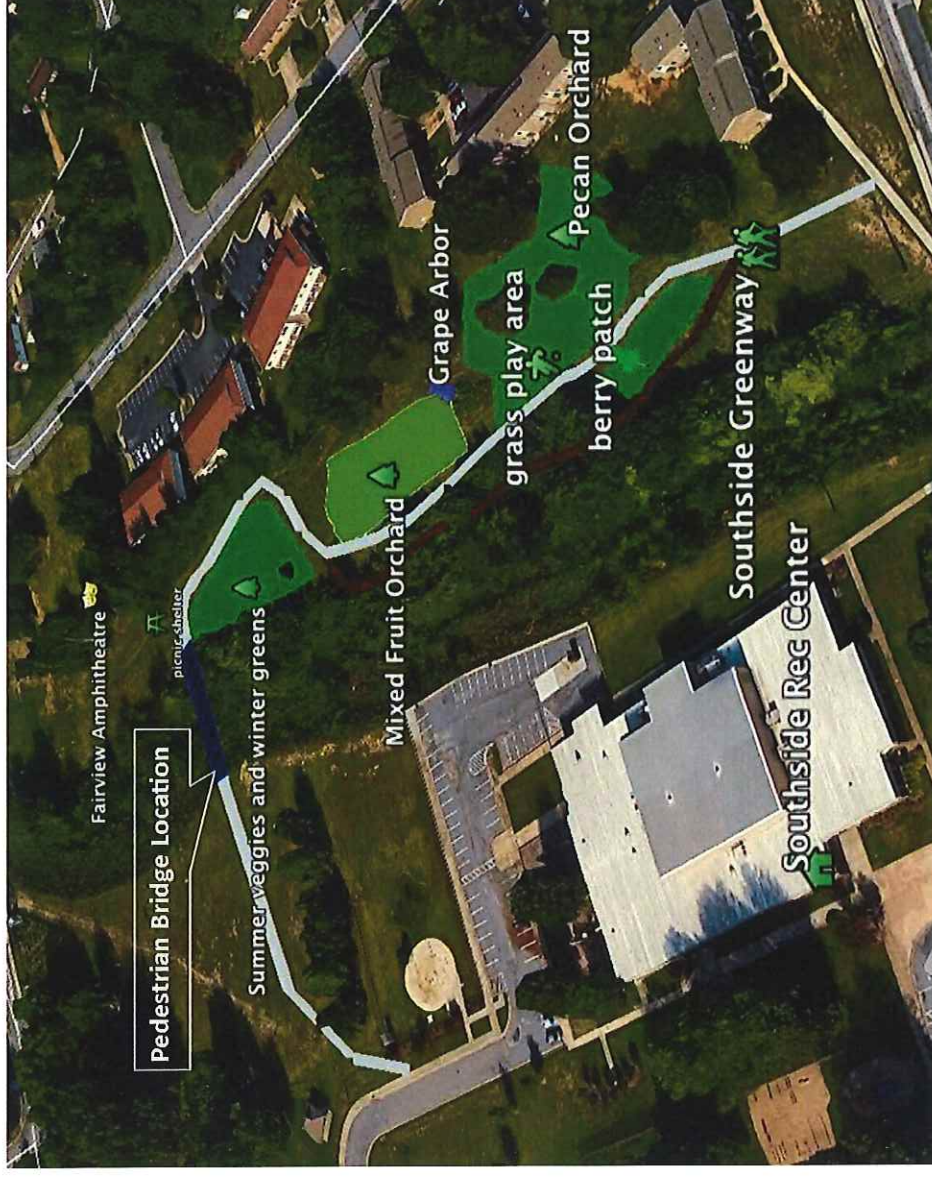
In 2009, the City received a sub-allocation of Neighborhood Stabilization Program (NSP) funds through the State's NSP allocation from HUD (authorized under the Housing and Economic Recovery Act of 2008).

The City used NSP funds to purchase nine (9) homes with the intent to sell to very low-income first-time homebuyers, but had difficulty selling the homes due to insecurity in the job market coupled with potential buyers who were unable to qualify for a mortgage based on underwriting criteria used by lenders at the time. Consequently, the City made the unsold properties available to income-eligible buyers on a lease-purchase basis.

After expending the initial NSP grant funds, the City has earned program income from net lease proceeds and the sale of homes (approximately \$380,000 presently on-hand and an estimated \$150,000 to be earned from future sales). As of this writing, the State's process to allow the use of program income for future projects has not been finalized. It is anticipated that these funds will be used for NSP-eligible projects that are "shovel-ready," as competition for these funds should be strong. Once the reallocation process has been developed, the City will make application to the State on behalf of projects that will include, but are not limited to, the following:

- Bridge over Richland Creek connecting a proposed walking trail between Southside Elementary school and City-owned land that will be developed into an "urban orchard" (see below)
- Acquisition of blighted properties in the Core City for "land banking"
- Installation of "traffic calming devices" in the Graves Avenue area on N. Hoskins Street

Proposed landscaping for the Richland Creek Pedestrian Bridge project includes additional “mulch pathways” and the development of various vegetable gardens including an orchard (comprised of berry shrubs, fruit and nut trees).



CD&H will remain in contact with the North Carolina Department of Commerce and will apply to utilize program income funds on-hand as well as other NSP program income funds when they become available.

Agency funded, if applicable: N/A

Eligibility citation: 24 CFR 570 (NSP is governed by CDBG regulations except where specifically waived.)

Estimated funding amount: \$531,460

Target area: High Point city limits

Needs addressed (access to affordable housing, homelessness, public services, etc.): Access to neighborhood services/amenities (bridge), removal of blight (land banking), and safety (traffic calming).

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of public improvements: 2 (bridge, and traffic calming)

of homes/lots acquired for rehabilitation and/or future development: 5

PROJECT/PROGRAM: HUD Section 108 Loan funds/LIHTC (Low Income Housing Tax Credit)

Section 108 is the loan guarantee provision of the Community Development Block Grant (CDBG) program. Section 108 provides communities with a source of financing for economic development, housing rehabilitation, public facilities, and large-scale physical development projects. The program allows local governments to transform a small portion of their CDBG funds into large, federally guaranteed loans for eligible projects such as funding public improvements in support of Low Income Housing Tax Credit (LIHTC) projects.

The City is proposing to submit a Section 108 loan guarantee application in March 2016 requesting an allocation of \$694,000, the amount available based on estimated CDBG allocations for the next five years and the City's Section 108 outstanding balance of \$3.35 million in loans to two LIHTC projects (\$1.35 million for Addington Ridge; \$2 million for Kirkwood Crossing). Construction of Addington Ridge (58 units) is completed and the construction of Kirkwood Crossing (84 units) is scheduled to begin in the spring of 2016.

The City proposes to allocate \$694,000 of Section 108 funds for an affordable housing project named Hartley Ridge, an 84-unit (or 72-unit, based on zoning allowance) multi-family development for low income beneficiaries.

Agency funded, if applicable: Wynnefield Properties

Eligibility citation: 24 CFR 570, Subpart M

Estimated funding amount: \$694,000

Target area: Citywide (emphasis in geographic areas outside traditional racial, ethnic and LMI concentration areas)

Needs addressed (access to affordable housing, homelessness, public services, etc.): Improved access to affordable rental housing

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of units developed: 72-84

B. Fair Housing

Fair housing is the right of individuals to obtain the housing of their choice, free from discrimination based on race, color, religion, sex, disability, familial status, national origin, and, depending on the circumstances, age. This right is assured by the Federal Fair Housing Acts of 1968 and 1988, as amended, which make it unlawful to discriminate in the sale, rental, financing, and insuring of housing. The Fair Housing Act declares, "It is the policy of the United States to provide, within Constitutional limitations, for fair housing throughout the United States." In addition, the law directs all executive departments and agencies to administer their programs and activities related to housing and urban development in a manner that affirmatively furthers the purposes of the Act.

The U. S. Department of Housing and Urban Development requires that all state and local governments participating in their programs submit an analysis of impediments to fair housing (AI). The City of High Point has completed this requirement with assistance from Mullin & Lonergan, Associates (M&L), most recently in 2015. Mullin & Lonergan's services were engaged to assure HUD and the community that the City is working to ensure that efforts are being made to "affirmatively further fair housing" as set forth in the regulations governing the Community Development Block Grant Program and Title VIII of the Fair Housing Act. The analysis of impediments to fair housing choice identified several impediments that could play a role in prohibiting fair housing choice in High Point. Based on these findings, the City is required to take appropriate actions to overcome the effects of the impediments identified through the analysis. In conducting the analysis of fair housing choice for the City of High Point, M&L completed a comprehensive review of policies, practices, and procedures that affect the location, availability, and accessibility of housing and current residential patterns and conditions. The analysis includes an examination of existing studies and literature along with a review of public policies from a fair housing perspective. M&L evaluated all the data for effectiveness of existing fair housing activities and examined barriers to fair housing choice for protected classes. Based upon the analysis, M&L provided a report of the findings and recommendations for remedies.

Exhibit A provides a brief summary of the impediments and recommended planned activities to address these impediments for High Point. **Table 2** below shows the proposed activities of the City in this fiscal year to address impediments identified in the report.

Agency funded, if applicable: N/A

Eligibility citation: 24 CFR 570.601

Estimated funding amount: Activities carried out through program administration.

Target area: High Point city limits

Need addressed (access to affordable housing, homelessness, public services, etc.): Improved access to affordable housing options

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of households assisted: TBD

Table 2. FAIR HOUSING ACTION PLAN

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
Goal 1: Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes	Strategy 1: Examine revising the City's hub-and-spoke transportation routes to more readily connect areas in the South with employment centers in the North	The City's transit system is designed to maximize available resources in its ability to provide public transportation services in the coverage area. At present, non-covered areas exceed the City's ability to properly address.			The concentration of assisted housing in RCAP and other low- and moderate-income census tracts An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
	Strategy 2: Prioritize the creation of a citywide sidewalk network within the capital improvement plan in order to increase multi-modal transit access				
	Strategy 3: Expand public transportation routes to serve new multi-family development	The City's transit system is designed to maximize available resources in its ability to provide public transportation services in the coverage area. At present, non-covered areas exceed the City's ability to properly address.			

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
Goal 2: Expand affordable housing opportunities in higher opportunity areas	Strategy 1: Invest and prioritize the City's HOME, CDBG and other grant funding as appropriate to provide incentives for the development of affordable family rental housing in higher opportunity areas	The City recognizes the need to de-concentrate the City's supply of affordable housing and, as an example, has supported the development of the following LIHTC projects that are located outside traditional racial, ethnic and LMI concentration areas: a) Admiral Pointe (census tract 163.06) – 54-units targeting LMI elderly (opened in January 2013); b) Addington Ridge (census tract 163.06) – 58-units targeting LMI families (opened in Fall 2015); c) Kirkwood Crossing (census tract 144.10) – 84-units targeting LMI families (under construction); and d) Hartley Ridge (census tract 144.07) – 72-84 units targeting LMI families (LIHTC application pending).	Increase in the number of affordable housing units in geographic areas outside traditional racial, ethnic and LMI concentration areas.	\$810,000 (Section 108)	The concentration of assisted housing in RCAP and other low- and moderate-income census tracts

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
	Strategy 2: Modify the City's homebuyer assistance program to increase the individual down payment amount available to eligible purchasers in higher opportunity / higher cost neighborhoods	At their November 3, 2014 meeting, Council approved the creation and implementation of the Core City Homebuyer Assistance Program (CCHBA). CCHBA was created to support greater income diversification within the City's Core City area. CCHBA loan amounts shall total \$7,500 for down payment, closing costs, and pre-paid expenses. Loan terms are for 5 years and forgiven at a rate of 20% per year. CCHBA can be used in conjunction with other Federal- or State-funded homebuyer assistance programs, based on program eligibility.	Increased income diversification in the Core City.	\$120,000	The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
	Strategy 3: Incorporate the Site and Neighborhood Standards criteria of the HOME program into the local site selection process	See Goal 2, Strategy 1 above	See Goal 2, Strategy 1 above	See Goal 2, Strategy 1 above	The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
	Strategy 4: Partner with High Point Housing Authority to strategically select parcels for affordable family rental housing development in higher opportunity areas				The concentration of assisted housing in RCAP and other low- and moderate-income census tracts

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
	Strategy 5: Complete the Development Ordinance Update and incorporate innovative provisions such as accessory dwelling units by-right, single-room occupancy (SRO) units and micro-units regardless of income				The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
	Strategy 6: Provide market-based density bonuses and other incentives to encourage mixed-income residential developments				The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
	Strategy 7: Explore the possibility of establishing a local trust fund to directly address the City's affordable housing needs				The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
	Strategy 8: Amend the zoning ordinance to include a reasonable accommodation policy for persons with disabilities				The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
Goal 3: Increase the awareness of fair housing education and outreach	Strategy 1: Continue the City's initiatives to provide education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and boards and commissions, city department heads and elected officials, private landlords, and the general public	Secure an LEP vendor to provide translation services for print media/brochures and digital media (website).			
	Strategy 2: Seek out immigrant populations with limited English proficiency for fair housing education	The City shall continue to expand its partnership with organizations that support limited English proficiency residents such as the following: a) World Relief High Point/Asheville, whose mission is to partner with the local church and community to assist refugee families by providing support as they adjust to their new lives in America; and b) Reading Connections, an adult literacy agency that provides free and confidential services that help to improve basic literacy skills, self-esteem, community service and leadership skills among new adult readers who live or work in Guilford County, NC.	Increased access by High Point residents with limited English proficiency to information about affordable housing opportunities		

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
	Strategy 3: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients that engage in discriminatory housing behavior				
	Strategy 4: Conduct paired testing in the rental housing market				A lack of paired testing in the housing market
Goal 4: Improve the physical environment in racially concentrated areas of poverty	Strategy 1: Continue the City's Lead Safe High Point Program to remediate lead hazards from affordable housing occupied by lower income families with children	The 2011 grant associated with the City's Lead Safe High Point Program expired as of April 2015. The City intends to re-apply for lead hazard control funds in the future. In the interim, the City's Urgent Repair Program funded by NCHFA allows for lead hazard control rehabilitation activities where children ages 6 and under have elevated blood lead levels.	Increase in the number of lead safe homes in High Point	Urgent Repair Program - NCHFA	An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
	Strategy 2: Continue the City's Community Based Initiatives Program to improve the quality of life for persons and households in lower income neighborhoods	See Section IV. Community and Neighborhood Development Activities.			

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
	Strategy 3: Continue to support the neighborhood organizations that work to revitalize lower income neighborhoods and empower residents	See Section IV. Community and Neighborhood Development Activities.			
	Strategy 4: Study the feasibility of establishing a land bank in the City as a means of redeveloping parcels for residential and non-residential land use where existing infrastructure is available			\$500,000 (General Fund)	An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
	Strategy 5: Expand the City's owner-occupied housing rehabilitation program to extend beyond primarily weatherization and code enforcement violations to approach home repair more comprehensively	See Section III. Affordable Housing Activities.			
	Strategy 6: Develop an urban resettlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing	See Goal 2, Strategy 2 above	See Goal 2, Strategy 2 above	See Goal 2, Strategy 2 above	An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities

Goal	Strategy	Activities, Milestones and Timetables	Anticipated Results	\$ Available for Activity (Source)	Impediment(s) Addressed
	Strategy 7: Continue the City's Homeownership Education Classes for homeowner / homebuyer / financial counseling for lower income households, minority households and households with limited English proficiency (LEP) for the purpose of educating owners and buyers on predatory lending, high-cost lending and financial management	See Section III. Affordable Housing Activities.			
	Strategy 8: Allocate CDBG assistance for public facilities and infrastructure in RCAP and near-RCAP areas	See Goal 2, Strategy 1 above	See Goal 2, Strategy 1 above	See Goal 2, Strategy 1 above	See Goal 2, Strategy 1 above

IV. Community & Neighborhood Development Activities

The Community and Neighborhood Development Center (CNDD) is currently located at 201 Fourth Street. The facility contains a 12-station computer center; two conference rooms; staff offices; a greeting area; and kitchen facilities

The CNDD is charged with developing and implementing the Department's non-housing strategies to implement community capacity development activities that promote stronger neighborhoods. Capacity-building and technical support for neighborhood associations still remains one of the most important services provided by CNDD. Technical and analytical support will also be provided to the Citizen's Advisory Council, Neighborhood Associations/Watch groups and Public Service grantees.

The Division will continue to manage funds for CDBG and CBI (public service grants), Volunteer Income Tax Assistance and Supervised Visitation Program for Women of Domestic Violence. The division will provide Continuum of Care (Special Needs Assistance Program; formerly Shelter Plus Care) training and

workshops for chronically homeless individuals. The division budget includes program delivery costs necessary to implement community and neighborhood development activities.

The computer lab will continue to provide computer services for public use. The computer lab is also used for the Volunteer Income Tax Assistance (VITA) program and computer classes. CNDD will continue to partner with Guilford Technical Community College to provide GED classes to individuals who have not completed their high school diploma. CNDD supports the Neighborhood Leaders Council which consists of ten neighborhoods and will continue to allow them to discuss issues of concern related to each neighborhood and the city as a whole. Members learn about local government, address crime issues in their areas, create strategies for youth development, organize around citywide issues and develop a plan of action as a group. Their focus this year will be on recruiting and sustaining new members within the associations.

CNDD will focus on community-building initiatives such as engaging leaders to serve on community boards, leadership development and youth development. The division will continue to provide support to the community through GED classes, computer classes, Volunteer Income Tax Assistance (VITA), various trainings/workshop, and homelessness prevention. The division will partner with various organizations to enhance services to low-moderate neighborhoods, homeless individuals and coordinating community programs.

A. PROPOSED ACTIVITIES FOR THE 2016-2017 PROGRAM YEAR

PROJECT/PROGRAM: Public Services Grants

The City of High Point annually sets aside a portion of its CDBG entitlement to fund public service activities provided by local community based organizations and non-profits for the benefit of low to moderate-income residents. Eligible activities include labor, supplies and materials, employment, crime prevention, child-care, health, drug abuse prevention, education, fair housing counseling, and energy conservation. The funds are allocated through a competitive process and the Citizens' Advisory Council (CAC) reviews all applications and makes recommendations to the City Council. A total of 9 applications were submitted for funding. The CAC reviewed applications on February 25th and recommendations will go to City Council in April.

Agency funded, if applicable: 9 non-profit agencies may be funded, pending review and approval of applications submitted

Eligibility citation: 24 CFR 570.201(e)

Estimated funding amount: \$61,050 (CDBG)

Target area: Census Tracts 136.01, 136.02, 138, 139, 140, 142, 143, 144.06, 144.08, 145.01, 145.02, 145.03, and 146

Need addressed (access to affordable housing, homelessness, public services, etc.): Creating a suitable living environment, increasing availability and accessibility of services, creating community sustainability

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted): To assist 9 non-profit agencies in establishing sustainable programming which will empower low and moderate-income residents of the City of High Point to achieve skills to stabilize and sustain their capacity to become self-sufficient.

PROPOSED SUBRECIPIENTS FOR PROGRAM YEAR 2016-2017:

Carl Chavis YMCA - Just 4 Real Production

The Carl Chavis YMCA is a grassroots organization that provides a variety of programs designed to meet the needs of low to moderate income youth and families. The Just 4 Real Production is designed to promote and enhance youth development as well as academic and interpersonal skill development.

Estimated funding amount: \$7,500 (Approval of application pending review)

Goal outcome indicator: Provide academic enrichment and life skills activities for 20 youth to enhance their speaking, writing, technical and cognitive skills, while effectively increasing their self-esteem and confidence.

Fairview Family Resource Center – National Family Week and Child Abuse Awareness Events

Family Service of the Piedmont is the largest private nonprofit agency serving children and families in Guilford County with Victim Services, Family Support Services, Consumer Credit Counseling Service and Family Counseling Services. The focus of the National Family Week and Child Abuse Awareness Project is to empower individuals and families to restore home, achieve stability and thrive through quality support services, advocacy and education.

Estimated funding amount: \$3,000 (Approval of application pending review)

Goal outcome indicator: Educate 200 low and moderate-income individuals residing in the Southside on resources available within the community to assist them with building strong, self-sufficient families.

Housing Authority of the City of High Point Housing Counseling Program

The Housing Authority of the City of High Point addresses the housing needs of low-to moderate-income persons by providing public housing units, Section 8 Housing Choice Vouchers and Section 8 new construction units subsidized by the United States Department of Housing and Urban Development. The mission of the organization is to provide eligible families and individuals with adequate and affordable housing, economic advancement and homeownership opportunities in a safe, drug-free and suitable living environment without discrimination. The Housing Counseling Program will prepare first-time homebuyers with financial education and prepare them to purchase affordable housing in the City of High Point.

Estimated funding amount: \$5,750 (Approval of application pending review)

Goal outcome indicator: Conduct financial literacy and homebuyer education with 200 low- and moderate-income individuals and improve their credit scores to empower them to rent or buy affordable housing to stabilize their families.

The Macedonia Family Resource Center All Lives Matter Youth and Community Summits

The Macedonia Family Resource Center provides programs that strengthen and empower youth and families by enriching their spiritual, social and family lives in God's Love. The Teen/Community Summits will focus on building relationships and communicating with law enforcement, respect for authority, social responsibility, the importance of higher education and making responsible life choices.

Estimated funding amount: \$9,400 (Approval of application pending review)

Goal outcome indicator: Increase the social awareness and personal responsibility of 50 low to moderate-income youth, empowering them to make positive life choices which affect them and their community at-large.

Operation Xcel – 3 Steps Ahead Summer Camp

Project Xcel engages students, parents and the community to increase educational, social and career skills through academic enrichment. After School and summer programming provides a safe and loving environment where youth can dream big, find purpose and reach their full potential as leaders in their homes, schools and communities. Workshops with parents focus on empowering parents work with and advocate for their children. The 3 Steps Ahead Summer Camp will provide youth with academic and cultural enrichment, literacy and math tutoring, college visits, community service projects, health and wellness training and nutrition.

Estimated funding amount: \$7,850 (Approval of application pending review)

Goal outcome indicator: Improve the academic proficiency and literacy level of 60 low-literate, low to moderate-income youth through academic tutoring, proper nutrition and athletics.

The M.I.N.D. Group (Moving in a New Direction) - Let's Eat Project

The M.I.N.D. Group specializes in community outreach and youth development. Its mission is to develop and implement programs that promote academic, athletic, social and moral excellence through community outreach, youth development and performing arts. The Let's Eat Project is a comprehensive education and athletics training program designed to offer 25 youth (ages 8-14) residing in the Burns Hills Neighborhood, a series of summer camp sessions focused on increasing their literacy, conceptual learning, strategic thinking and problem –solving skills, while enhancing their athletic abilities, overall health and nutrition.

Estimated funding amount: \$12,500 (Approval of application pending review)

Goal outcome indicator: 25 low to moderate-income youth will improve their academic proficiencies, athletic prowess, nutrition and general health.

Salvation Army Boys and Girls Club of High Point – Fit Together

The Salvation Army Boys and Girls Club of High Point has been at the forefront of youth development, working with youth who need the Boys and Girls Club most. It is the mission of the organization to enable all young people to realize their true potential as productive, responsible and caring citizens. The Fit Together project is a fitness and training course designed to 40 teams (consisting of one child with an adult family member) to undertake a goal-oriented program which educates, tracks their fitness, nutrition and overall health for the purpose of instilling healthier lifestyle choices.

Estimated funding amount: \$7,050 (Approval of application pending review)

Goal outcome indicator: Improved health, fitness and knowledge of nutritional foods and exercise which promote a healthy well-being and lifestyle.

Southwest Renewal Foundation of High Point, Inc. – Little Free Libraries

The Southwest Renewal Foundation is a grassroots organization dedicated to raising the quality of life and making the Southwest district of the city more economically competitive. Two free-standing library boxes will be placed in the district and stocked by Friends of the Library and Reading Connections, Inc. The Little Free Libraries project will make free books available in an area where there is no public library or access to bookstores where books can be purchased. Through the project, books will be free to all Southwest children, students and residents, encouraging their reading, literacy and proficiency.

Estimated funding amount: \$1,300 (Approval of application pending review)

Goal outcome indicator: Provide access to free books for an estimated 200 youth in the Southwest district to increase their reading proficiency.

YWCA - Making Proud Choices Pregnancy Prevention Program

The YWCA of High Point endeavors to eliminate racism, empower women and promote peace, justice, freedom and dignity for all. The Making Proud Choices Pregnancy Prevention project is a teen pregnancy intervention program which engages youth in candid dialogue around responsible sexual behavior. Sessions focus on preventing sexually transmitted diseases and HIV, as well as increasing self-esteem, self-respect and decision-making skills necessary to reduce the teen pregnancy rate within the community.

Estimated funding amount: \$6,700 (Approval of application pending review)

Goal outcome indicator: Increase and sustain the ability of 60 low and moderate-income teens to reduce risky sexual behavior leading to sexually transmitted diseases and pregnancy.

PROJECT/PROGRAM: Community Capacity Building Program

The program is designed to develop, implement and coordinate community capacity-building services designed to help increase neighborhood stability and viability. Staff will provide technical assistance to neighborhood associations/watch groups, helping them to become catalysts for

neighborhood revitalization. Community and Neighborhood Development Division will continue the focus on strengthening neighborhoods through a variety of educational programs, short-term and long-term training, workshops, individualized instruction and technical assistance as needed. This year the Division will continue the effort to partner with other organizations on youth development within the neighborhoods and assistance with community building activities.

Agency funded, if applicable: N/A

Eligibility citation: 24 CFR 570.201(p)

Estimated funding amount: \$186,238 (CDBG); \$67,382 (General Fund)

Target area: Census Tracts 136.01, 136.02, 138, 139, 140, 142, 143, 144.06, 144.08, 145.01, 145.02, 145.03, and 146

Need addressed (access to affordable housing, homelessness, public services, etc.): Access to leadership/youth development and capacity building training for neighborhood-based organizations (i.e.: neighborhood associations, neighborhood watch groups).

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted): Facilitate capacity building activities for 10 designated neighborhood associations.

NEIGHBORHOOD ASSOCIATIONS

Neighborhood goals are listed below:

Burns Hill Neighborhood Association

The Burns Hill Neighborhood Association continues to be actively involved in issues of crime, planned neighborhood activities, increasing membership, neighborhood beautification and youth development. Their plan for the year includes:

- Increase membership by increasing door to door visitation and holding an open house;
- Better participation in Great American Cleanup in the Spring and Clean Sweep America Fall Cleanup (residents, landlords, churches, organizations);
- Improve the association's financial status through fundraising and quarterly financial reviews;
- Fellowship and better member recognition (10th Annual Commitment to Community Awards Dinner);
- Improve relationships with landlords to enhance the occupancy, function and appearance of the neighborhood;
- Continue to increase volunteers and community members utilizing the Burns Hill Food Pantry;
- Begin work and open Burns Hill garden;
- Obtain a house in the neighborhood to repair and promote a positive image of Burns Hill;
- Create and support initiatives to involve Burns Hill youth.

Cedrow Resident's Association

Cedrow Resident's Association is restructuring the organization.

Five Points Neighborhood Association

The Five Points Neighborhood Association will continue to focus on re-organization and increasing membership. Their plan for the year includes:

- Recruiting residents and businesses to join the Association
- Hosting the 2nd Annual 'A Day in Five Points' event to forge partnerships between businesses and the neighborhood to expand accessible resources
- Conducting neighborhood beautification events
- Engaging youth in neighborhood activities

Highland Mills Neighborhood Association

Highland Mills Neighborhood Association will focus on leadership development and membership recruitment. Their plan for the year includes:

- Conducting a membership drive to engage more residents in the association
- Preparing an inventory of dilapidated and/or abandoned properties in the neighborhood
- Beautifying and cleaning up the neighborhood to increase curb appeal
- Continuing to partner with the High Point Police Department to address crime
- Hosting an event to unveil new neighborhood entry signs, sign-toppers and the Historic Marker designating the Highland Cotton Mill Village on the National Registry of Historic Places

Macedonia Neighborhood Association

The Macedonia Neighborhood Association will focus on increasing membership and getting current members to become actively involved. They will continue to partner with Macedonia Family Resource Center and assist with programs to address needs of residents living in the neighborhood. Their plan for this year includes:

- Increase membership;
- Select members to hold offices and develop committees;
- Increase awareness concerning the association, resource center and neighborhood;
- Increase youth participation;
- Encourage residents to improve the appearance of the neighborhood;
- Continue to organize and operate a Toy Exchange for community members;

- Continue partnership with Wesleyan Christian Academy.

Oakview Citizens' Council

The overall goal of the Oakview Citizen's Council is to continue engaging neighborhood residents in issues concerning the neighborhood. Their plan for the year includes:

- Continuing to attract new members
- Continuing crime watch efforts in partnership with the High Point Police Department
- Conducting food drives and distribution to needy families in the neighborhood
- Inviting guest speakers to conduct presentations on issues of interest to our neighborhood

Pershing Street Neighborhood Watch

The Pershing Street Neighborhood Watch continues to focus on crime and safety issues. The residents are actively involved in improving the quality of life in the neighborhood. Their plan for this year includes:

- To complete work on bylaws and mission statement;
- Complete Community-Based Initiative grant and have a grand opening at the "new" community park;
- To continue to make the park more family-friendly;
- Continue to partner with the City of High Point Parks and Recreation Department to improve the community park;
- To fill all officer positions.

Southside Neighborhood Association

The Southside Neighborhood Association is excited about trying to recruit new members to their association. They will continue to partner with Family Service of the Piedmont, Fairview Street School, Boys & Girls Club and High Point Parks & Recreation to celebrate National Family Night. Their plan for this year includes:

- Hold elections to fill vacant positions and replace officers rotating off;
- Continue work in the community garden and increase community participation;
- Door Knocking in the Neighborhood to increase membership;
- Neighborhood Spring Clean-Up;
- Youth participation;
- National Night Out Activities;
- Partner with Family Service of the Piedmont with 'National Family Night';

- Holiday Celebration with Neighborhood Residents.

Washington Terrace Neighborhood Watch

The Washington Terrace Neighborhood Watch endeavors to create a peaceful, safe and clean neighborhood where families can live and recreate. Their plan for the year includes:

- Increasing awareness of the Neighborhood Watch to engage residents
- Electing officers
- Continuing crime watch efforts in partnership with the High Point Police Department
- Reducing the speed limit on various streets throughout the neighborhood

Washington Street Neighborhood Association

The Washington Street Neighborhood Association will work diligently with local businesses, the City of High Point Police Department, Community & Neighborhood Development Division, and area Churches to assist in eliminating crime, drugs and theft with the area. Their plan for this year includes:

- Increase community participation and awareness;
- Hold elections for new officers;
- Participate in various community events include the annual National Night Out celebration and Unity Festival;
- Continue partnerships with community partners and seek donations and fundraising opportunities;

West End Neighborhood Association

West End Neighborhood Association will focus on re-organization, membership recruitment, crime watch, and neighborhood beautification. Activities planned for the year include:

- Conducting a membership drive to increase resident participation in the Association
- Continuing work on the Bountiful Harvest Community Garden and Park
- Petitioning to reduce speed limits through the neighborhood
- Preparing an inventory of abandoned homes and businesses in the neighborhood
- Electing Street Captains to develop a Neighborhood Crime Watch Corps
- Collaborating with partners to offer activities for neighborhood youth

PROJECT/PROGRAM: Community Based Initiatives (CBI) Grant Program

The City assigns a portion of its CDBG entitlement to fund the Community Based Initiative (CBI) for public service activities provided by neighborhoods and/or local community based organizations for the benefit of low to moderate-income residents. Organizations are not required to have a 501 3(c) status. Eligible projects can use CBI funds as seed money for the purchase of supplies, materials, goods and services directly related to the implementation of the project. The project must provide matching resources in dollars, in-kind contributions, or volunteerism that equals or exceeds 25% of the grant amount requested. All activities must be implemented within the city limits of High Point, involve neighborhood people in the identification, planning or execution of the proposed activity.

The application process will begin in March/April timeframe. The Citizen Advisory Council (CAC) will review the applications in May/June and recommendations will be sent to the City Council in April for approval.

The CAC will select at least ten (10) neighborhoods and/or local community based organization improvement projects to be completed by June 30, 2017.

Agency funded, if applicable: Grassroots community organizations may be funded, pending review and approval of applications submitted.

Estimated funding amount: \$10,000 (CDBG)

Target area: Census Tracts 136.01, 136.02, 138, 139, 140, 142, 143, 144.06, 144.08, 145.01, 145.02, 145.03, and 146

Needs addressed: (access to affordable housing, homelessness, public services, etc.): Creating a Suitable Living Environment, increasing availability and accessibility, creating sustainability

Goal outcome indicator: Assist community-based organizations and neighborhood associations to create initiatives within their communities will empower low and moderate-income residents within the Core City of High Point to create a sense of pride and ownership of neighborhoods which are safe, clean and crime-free.

PROJECT/PROGRAM: Continuum of Care Supportive Services

The City of High Point is formerly a grant receipt of a Continuum of Care (CoC) Permanent Supportive Housing grant with Open Door Ministries serving as the service provider. The program was transferred to Open Door Ministries this past year. The City will continue its involvement with the CoC and conduct monthly training and workshops for Open Door Ministry clients. In addition, the City will provide grant-related technical assistance to Open Door Ministry case managers and offer building space for case managers at 201 Fourth St on an as-needed basis.

The City will also provide move-in and yearly inspections at each residence to ensure compliance with HUD quality standards to Open Door Ministry clients.

Estimated funding amount: \$0 (Value of in-kind services to be provided \$10,142)

Eligibility citation:

Target area: Area-wide benefit

Need addressed (access to affordable housing, homelessness, public services, etc.): Permanent Supportive Housing for Chronically Homeless Individuals

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted):

of persons to be served: 30

Partners Ending Homeless

(City of High Point is a Community Coalition Member.)

Partners Ending Homelessness (PEH) works to encourage public understanding of the causes and conditions of homelessness and lead a strong and stable system of care for individuals and families to reduce homelessness in Guilford County. PEH focuses on generating housing, strengthening prevention and supportive service efforts, and increasing coordination, collaboration and access through the Continuum of Care (CoC) in our community. PEH is the planning & coordinating organization for homeless service delivery in our CoC. PEH implements, evaluates & updates Guilford County's Strategic Plan to End Homelessness. PEH is a groundbreaking, collaborative partnership of over 80 community partners that work to generate housing, strengthen prevention & supportive services, & increase coordination, collaboration & access through the community's continuum of care. Our CoC is currently implementing its Coordinated Assessment System pilot project via our ESG program's CoC-Wide Rapid Rehousing Team. The CoC has developed a common assessment tool and a coordinated "map" of which providers will focus on which sub-populations. Additionally, PEH has contracted with a consultant to expand and assist in the holistic development of the Coordinated Assessment Program and data usage for the entire CoC.

Estimated Funding Amount: \$3,106,636 (CoC multi-year grant)

Target Area: Guilford County

Need addressed (access to affordable housing, homelessness, public services, etc.): Homeless services

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted): Attend all quarterly Community Coalition meetings; Participate in the Coordinated Assessment and/or Coordinated Intake process as needed.

Volunteer Income Tax Assistance Program (VITA)

The Community & Neighborhood Development Division continues to offer free tax preparation for low-to moderate-income individuals during the tax season with a household income of \$54,000 or less. The program, sponsored by the Internal Revenue Service, offers services six days a week free of charge to residents of High Point and surrounding areas and expects to file more than 550 total federal tax returns this year, working with area partners to expand services to taxpayers beyond just tax preparation. Partners will be providing other resources and services to taxpayers as needed. Partnerships this year include: the NC VITA Coalition, the United Way of High Point, High Point University, Guilford Technical Community College, West End Ministries, and Macedonia Family Resource Center. The program also provides college students with hands-on experience in tax preparation and volunteer service. The program will increase awareness of the Earned Income Tax Credit and Child Tax Credit. The number of VITA sites will increase this year with the addition of two new sites. The five VITA sites this year are Community and Neighborhood Development Center at 201 Fourth Street, West End Community Center at 901 English Road, Macedonia Family Resource Center at 401 Lake Avenue, GTCC S Main Campus at 901 S Main St, and the Salvation Army Boys and Girls Club at 121 SW Cloverleaf Pl.

Estimated Funding Amount: \$4,000

Eligibility citation: N/A

Target Area: City-wide

Need addressed (access to affordable housing, homelessness, public services, etc.): Prepare tax returns for low-to-moderate income households free of charge. Increase awareness of federal state and education credits for low to moderate citizens. Provide citizens with volunteer and training opportunities.

Goal outcome indicator (# of facilities improved, households served, low/moderate income persons benefitted): The VITA program will prepare at least 550 federal tax returns this year.

Harmony House Supervised Visitation and Exchange Program

This project will provide a safe, neutral, and family friendly means of available supervised visitation and safe exchange services for victims of domestic violence, child abuse, sexual assault, teen dating violence, and stalking. The project will serve families in Guilford County and surrounding counties as appropriate.

Agency funded, if applicable: Family Service of the Piedmont

Eligibility citation: The Violence Against Women Act (VAWA) of 1994

Estimated funding amount: \$12,745 (Balance from prior year)

Target area: Serve families in Guilford County and surrounding counties as appropriate for supervised visitation and safe exchange services.

Need addressed: (access to affordable housing, homelessness, public services, etc.): Offer safe visitation services to adult victims, their children and the children separated from parents due to a history of abuse. Provide safe access for parents to visit their children.

Goal outcome indicator: (# of facilities improved, households served, low/moderate income persons benefitted): Protect children from witnessing or being caught in the emotionally and/or physically abusive relationship of their separated parents. Protect formerly battered partners who have escaped domestic violence from further violence while complying with custody exchange and visitation orders. Prevent inter-parental conflict experienced by children during visitations or exchanges. Operate community collaborations in order to positively impact the safety of children including their abused parent while at the same time holding batterers accountable.

V. Other Actions – Code Enforcement

Effective February 18, 2016, the Code Enforcement Division became a part of the Community Development & Housing Department. In an effort to address the comprehensive development and revitalization efforts of the City, particularly in the Core City, this division realignment is a natural fit and progression to focus on such efforts. This realignment is expected to increase our efforts and focus on nuisance abatement as a tool for neighborhood improvement.

Code enforcement is the process whereby local governments gain compliance with ordinances and regulations regarding health and housing codes, land use and zoning ordinances, sign standards, and uniform building and fire codes. The purpose of having building codes and enforcement inspections is to, of course, protect the public health, safety and welfare. Code enforcement inspections may also seek to encourage residents (homeowners and tenants) to maintain the appearance and value of their housing units. It is hoped that other residents are motivated to keep their housing units in compliance with local codes because of the good condition of the surrounding housing units. Since this does not always happen, units of government enforce housing codes to ensure that housing units are maintained. Housing units that are well-maintained and meet all local housing codes and standards protect the health and safety of occupants, improve the value of the residential units in a neighborhood and give such neighborhoods the appearance of being well-maintained.

Housing units that are dilapidated and/or vacant may attract undesirable activity. Code enforcement can help to reduce crime in a neighborhood, as well. Studies have indicated that crime levels tend to be higher in areas where repairs are not accomplished. Therefore, jurisdictions monitor and maintain buildings, particularly in urban areas, to prevent vandalism and further deterioration so that neighborhoods are well-maintained and experience less crime.

Comments should be sent to Thanena Wilson (Public Comment), City of High Point, Community Development & Housing Department, PO Box 230, High Point NC 27261; via email at thanena.wilson@highpointnc.gov; or faxed to 336-883-3355. All comments must be received by 5:00 p.m., April 19 2016.

For additional information on any of our programs, please call 336-883-3349.

DRAFT

ANALYSIS OF IMPEDIMENTS AND ASSESSMENT OF FAIR HOUSING SUMMARY: HIGH POINT

About the Regional Assessment of Fair Housing

The preparation of this Regional Assessment of Fair Housing (AFH) serves as a component of the Piedmont Triad's efforts to satisfy the requirements of the Housing and Community Development Act of 1974. This legislation applies to any community receiving federal funding through the following programs: Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for Persons With Disabilities, and Emergency Solutions Grant. The AFH covers the entitlement communities of the City of Burlington, the City of Greensboro, the City of High Point, and the Surry HOME Consortium, all of which receive federal funds directly from the Department of Housing and Urban Development (HUD). The four entitlement jurisdictions in the Piedmont Triad collaborated on this expanded Analysis of Impediments, which includes a more thorough Assessment of Fair Housing at a regional scale as well as analyses for each jurisdiction, in response to the Proposed Rule published by HUD on July 19, 2013. To meet current requirements, each jurisdiction has an individualized Executive Summary that highlights its impediments and proposes action strategies to address local issues.

Also covered by this AFH are the non-entitlement areas within the Triad, which are eligible to apply for HUD funding from the North Carolina Small Cities Community Development Block Grant Program. The non-entitled areas include 67 municipalities and 12 counties within the Triad.

The development of the AFH follows the completion of the Regional Fair Housing & Equity Assessment (FHEA) prepared for the Triad by Sills Consulting, LLC. The AFH picks up where the FHEA ended and provides a more in-depth analysis of communities of opportunity as well as a series of determinants of fair housing, priority fair housing issues and a series of recommended strategies that, if implemented, would eliminate the impediments to fair housing choice. This study will also be used to guide and prioritize elements of the Consolidated Plan and Annual Action Plan implementation process for each of the four HUD entitlement jurisdictions.

The Regional AFH provided the basis for High Point's Analysis of Impediments, which is summarized below and is designed to meet the City's obligation under HUD rules to affirmatively further fair housing.

Top Findings in High Point

- *High Point is growing and becoming more diverse*
- *Patterns of segregation and poverty persist in High Point*
- *Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of High Point*
- *High Point's supply of housing that is affordable to lower-income residents is shrinking as demand rises*
- *There is a lack of housing that is affordable to lower-income residents in high-opportunity areas, and members of the protected classes face severe housing challenges*
- *High Point faces several policy-related impediments that either directly or indirectly limit fair housing choice*
- *High Point can take action to address important fair housing priorities*

Key Demographic Trends

High Point is growing and becoming more diverse

High Point has shown steady population growth, but is still growing at a slower rate than other cities in the Triad region and the state as a whole. High Point grew 65.1% from 1970 to 2012, compared to 87.2% growth in Greensboro, 31.1% in Burlington, 63.8% in the Piedmont Triad region, and 87.5% in North Carolina. In the decade from 2000 to 2010, High Point's population growth rate (21.6%) exceeded that of Greensboro and the rest of the region.

Like most of the region, High Point is also becoming much more diverse. While the White population increased 7.7% from 2000 to 2010, the non-White population gained 17.5% and the Hispanic population increased 110.8%, becoming the fastest-growing demographic by far. This is the highest rate of Hispanic population growth out of any study area within the Piedmont Triad. The Black population also increased 26.1%. Minorities in High Point tend to have larger families: 83% of Hispanic families in High Point had three or more members, compared to 50.4% for Whites. Because race and ethnicity are protected classes, this increases the importance of fair housing strategies that can accommodate High Point's diversifying population in the future.

Figure 5 : Population Change, 2000-2010

Region	2000		2010		% Change
	#	%	#	%	
Region	1,464,979	100.0%	1,640,717	100.0%	12.0%
White	1,099,957	75.1%	1,146,900	69.9%	4.3%
Non-White	365,022	24.9%	493,817	30.1%	20.8%
Black or African American	288,080	19.7%	340,448	20.7%	18.2%
American Indian and Alaska Native	5,271	0.4%	7,970	0.5%	51.2%
Asian/Pacific Islander	18,461	1.3%	33,339	2.0%	80.6%
Some other race	35,867	2.4%	79,979	4.9%	123.0%
Two or more races	17,343	1.2%	32,081	2.0%	85.0%
Hispanic*	72,867	5.0%	142,829	8.7%	96.0%
High Point	85,839	100	104,371	100.0%	21.6%
White	51,985	60.6	55,989	53.6%	7.7%
Non-White	33,854	39.4%	48,382	46.4%	17.5%
Black or African American	27,275	31.8	34,394	33.0%	26.1%
American Indian and Alaska Native	392	0.5	579	0.6%	47.7%
Asian/Pacific Islander	2,889	3.4%	6,390	6.1%	121.2%
Some other race	1,950	2.3	4,573	4.4%	134.5%
Two or more races	1,348	1.6	2,446	2.3%	81.5%
Hispanic*	4,197	4.9	8,847	8.5%	110.8%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

Patterns of segregation and poverty persist in High Point

Diversification has not resulted in integration, and High Point still experiences moderate levels of racial and ethnic segregation. This was determined by using the dissimilarity index, a statistical analysis that calculates how disproportionately distributed certain populations are distributed throughout an area. Within High Point, White/Black and White/Asian segregation have both decreased over the last 30 years, meaning that these races are becoming more integrated. However, White/Hispanic segregation has increased slightly over the same period, but shows new integration during the last decade as new Hispanic residents arrived. High Point had higher levels of Black, Hispanic and Asian segregation than the Piedmont Triad region as a whole. Whites and Blacks have historically been and still remain the most segregated two racial groups in High Point.

High rates of minority concentration exist in High Point, along with above-average rates of poverty. High Point has two Census block groups with Black concentration at least 10% above the regional average and 14 Census block groups with Hispanic concentration at least 10% above the regional average.

When the level of minority concentration exceeds 50% and the poverty rate exceeds 40% in a given area, it is known as a racially concentrated area of poverty, or RCAP. Residents in RCAPs throughout the region tended to have lower incomes, longer commutes, and work in sectors with less potential for upward mobility. High Point has a large RCAP area with multiple block groups in the southern and eastern neighborhoods of the city, including Southside and East Central. There are also areas of High Point with high levels of poverty and minority concentration, but not as severe as to be classified as an RCAP. These areas are classified as Near-RCAPs, which are defined as block groups with poverty rates at least 10% above the average were clustered in a single contiguous area encompassing the southern neighborhoods of High Point. These areas are critical for local stakeholders to monitor: conditions may worsen if nothing is done, but there also exists the potential for catalytic, high-impact investment to prevent the neighborhoods from crossing the threshold to RCAPs.

The following map displays the RCAP and Near-RCAP areas of High Point.

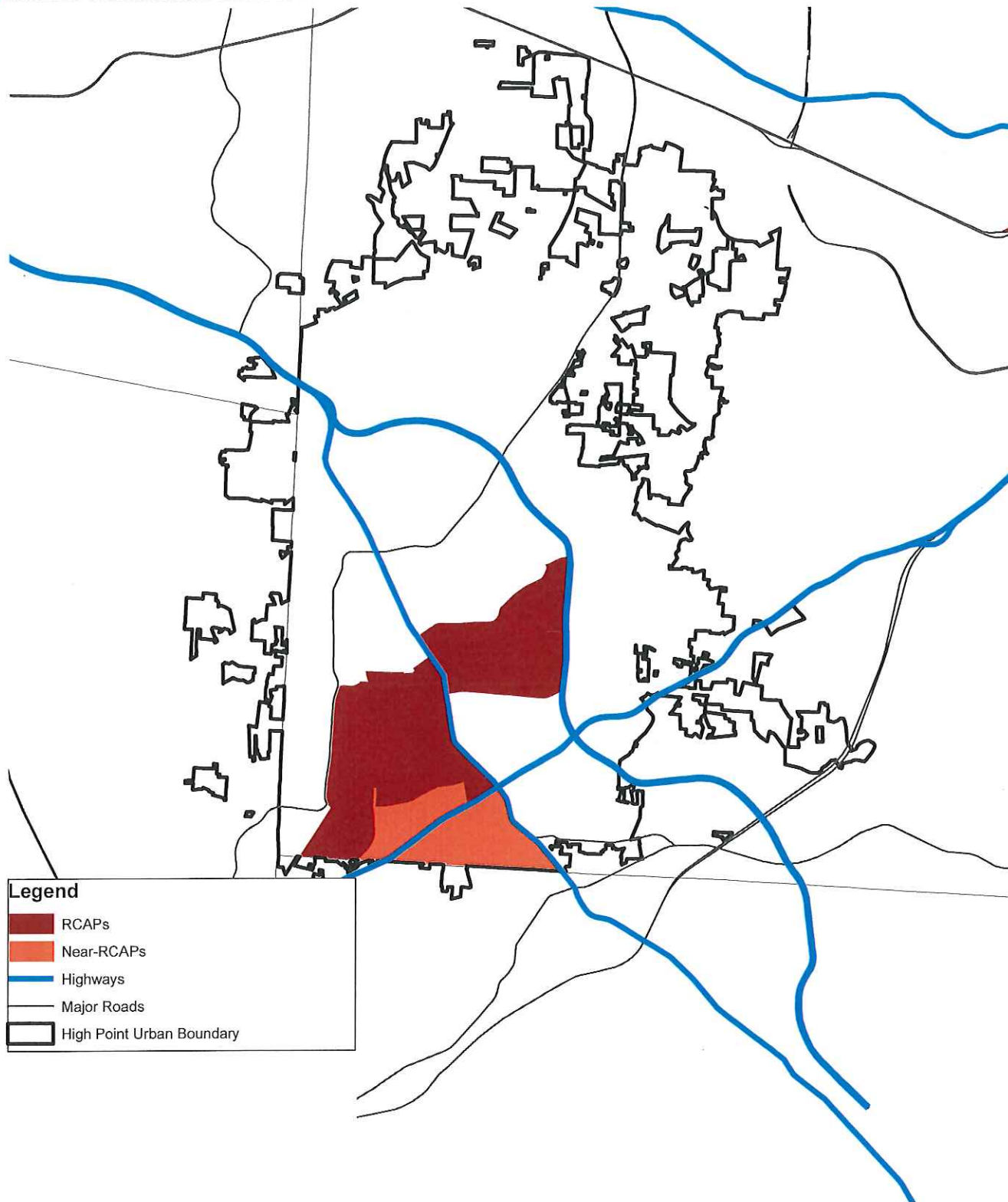
Figure 6 : Local Dissimilarity Indices, 1980-2010

		1980	1990	2000	2010	Trend
Burlington	White and Black	0.59	0.45	0.48	0.42	<i>Decreasing</i>
	White and Hispanic*	0.31	0.15	0.41	0.48	<i>Increasing</i>
	White and Asian	0.33	0.17	0.26	0.24	<i>Decreasing</i>
Greensboro	White and Black	0.71	0.60	0.57	0.57	<i>Decreasing</i>
	White and Hispanic*	0.33	0.22	0.46	0.49	<i>Increasing</i>
	White and Asian	0.29	0.27	0.35	0.36	<i>Increasing</i>
High Point	White and Black	0.64	0.58	0.47	0.46	<i>Decreasing</i>
	White and Hispanic*	0.37	0.20	0.47	0.39	<i>Increasing</i>
	White and Asian	0.39	0.19	0.35	0.34	<i>Decreasing</i>
Surry HOME Consortium	White and Black	0.53	0.33	0.34	0.41	<i>Decreasing</i>
	White and Hispanic*	0.52	0.27	0.22	0.25	<i>Decreasing</i>
	White and Asian	0.49	0.27	0.32	0.33	<i>Decreasing</i>

Source: American Community Survey, 1980-2010

*Hispanic ethnicity is calculated independently of race

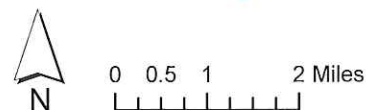
MAP 5:
RACIALLY CONCENTRATED AREAS OF POVERTY IN HIGH POINT



Legend

- RCAPs
- Near-RCAPs
- Highways
- Major Roads
- High Point Urban Boundary

Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates



Access to Opportunity

Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of High Point

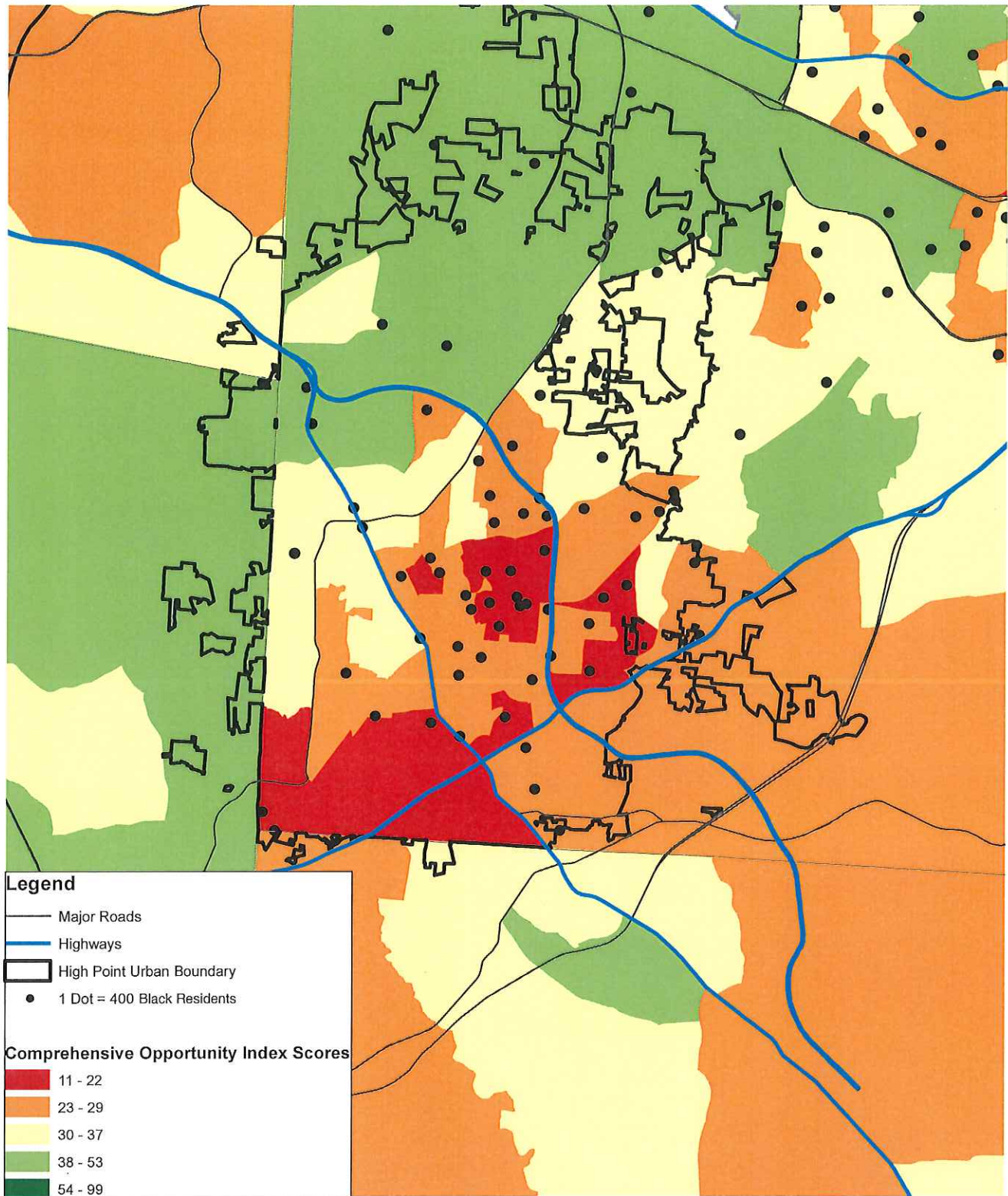
The distribution of opportunity in the region is also uneven, typically in a way that isolates low-income and minority populations from jobs, amenities, and suburban housing opportunities. In High Point and the surrounding area in Guilford County, this is the case. Utilizing a technique known as opportunity mapping, the geographic footprint of opportunity and inequality can be quantified and projected onto maps. The resulting maps allow communities such as High Point to analyze opportunity at the local level as well as place their situation into a regional context. Key variables were analyzed, and High Point's score relative to the region include the following:

- Neighborhood School Proficiency: above average
- Labor Market Engagement: above average
- Prosperity: below average
- Job Access: above average
- Environmental Health Hazard Exposure: below average
- Transit Access: above average

The composite score for High Point, which weighs each variable equally to estimate overall opportunity, was 29.1 points. This is very close to the regional average of 29.8 points. Opportunity is lower in High Point than in Greensboro and Burlington, and the four-county Surry HOME Consortium. Within High Point, the highest-scoring areas were concentrated in the northern neighborhoods of the city and in the suburbs in Guilford County near Greensboro and Winston-Salem. The lowest-scoring areas were in southern and central High Point. These are the same neighborhoods where high levels of poverty and minority concentration exist.

The following maps illustrate the location of Black and Hispanic residents against the backdrop of opportunity areas. Areas with low opportunity scores are shown red, while areas with high opportunity scores are shown in green. Moderate opportunity areas are shown in the intermediate colors. The levels of opportunity in High Point very clearly take a north-south polarization. Black residents of High Point—and Hispanic residents to a lesser extent—are clustered in low-opportunity areas, which contain inferior access to basic amenities and resources for upward mobility.

MAP 6:
BLACK POPULATION AND AREAS OF OPPORTUNITY IN HIGH POINT

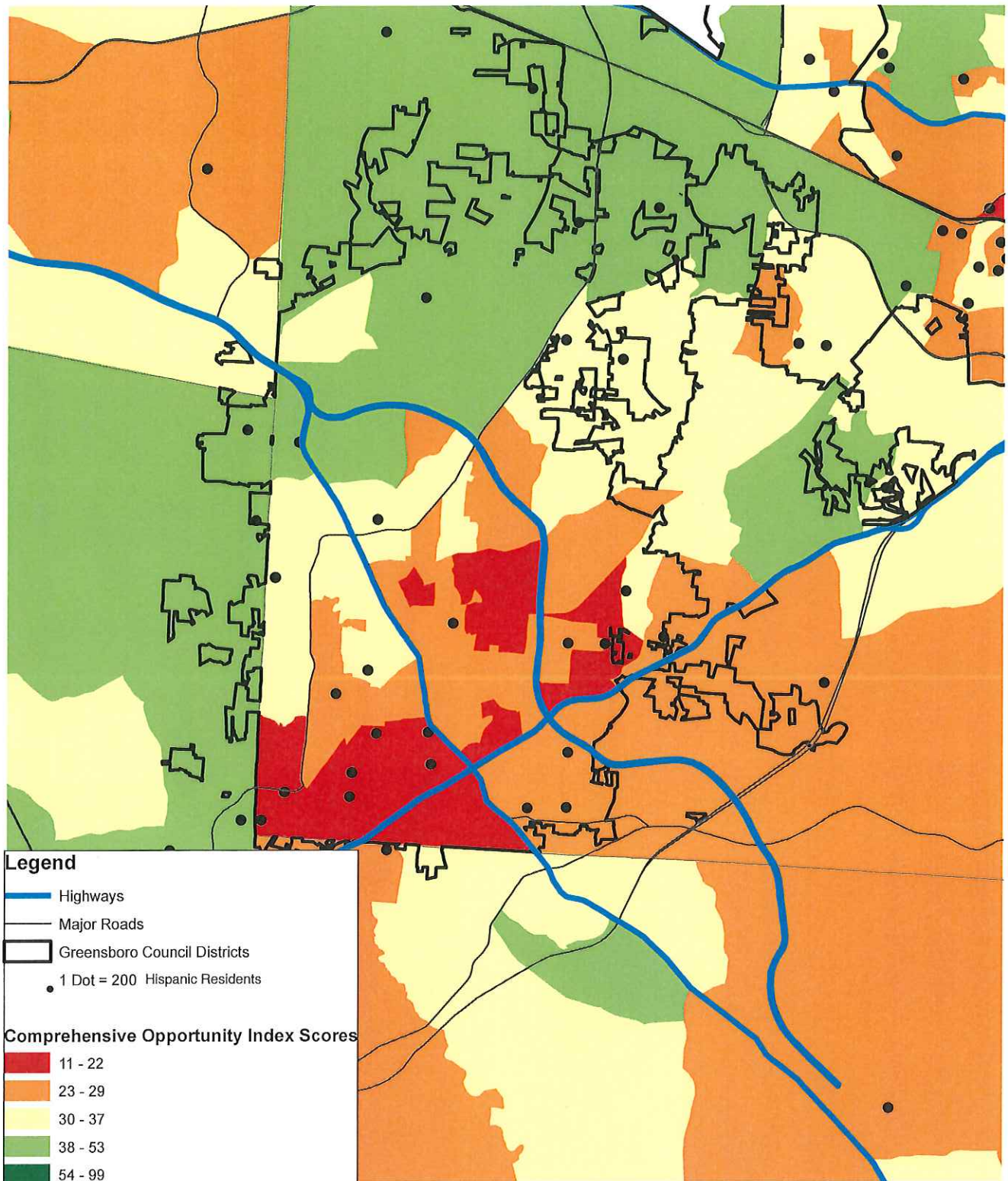


Source: 2010 American Community Survey, HUD
 Calculations by Mullin & Lonergan Associates



0 0.5 1 2 Miles

MAP 7:
HISPANIC POPULATION AND AREAS OF OPPORTUNITY IN HIGH POINT



Source: 2010 American Community Survey, HUD
 Calculations by Mullin & Lonergan Associates



0 0.5 1 2 Miles

Key Housing Trends

High Point's supply of housing affordable to lower-income residents is shrinking as demand rises

Housing issues are a major underlying cause of unequal access to opportunity, in both the Piedmont Triad region and in the City of High Point. Despite stagnant or declining real incomes in the region, the supply of affordably-priced housing units has shrunk. This has resulted in cost burden (spending over 30% of one's income on housing), overcrowding, and a lack of affordable housing options in high-opportunity areas. These housing issues disproportionately affect members of the protected classes, who also tend to have lower incomes and larger households.

There is a lack of housing affordable to lower-income residents in high-opportunity areas, and members of the protected classes face severe housing challenges

Between 2000 and 2010, real income in High Point decreased from \$49,770 to \$43,594, a loss of 12.4%. However, the median house value in High Point increased 11.1%, from \$129,208 to \$143,500. Median rent also increased from \$655 to \$720, an increase of 10%. Households in High Point must spend more money on housing, but are making less. While incomes throughout the Piedmont Triad declined between 2000 and 2010, incomes in High Point declined more severely. Both median housing values and median rents

also rose at a higher rate than in Greensboro, Burlington, or the Surry HOME Consortium.

At the same time, market-rate housing is disproportionately filling high-end rental demand rather than addressing the demand for affordable housing. From 2000 to 2010, the number of units in High Point renting below \$500 decreased 53%, and the number of units renting from \$500 to \$699 decreased 6.4%. Conversely, the number of units renting for \$1,000 or more increased 485%. Even accounting for inflation, this represents significant shifts in High Point's market-rate housing inventory. This issue is more severe in High Point than in the Piedmont Triad region as a whole.

The table below shows the distribution of housing costs for rental units within High Point, in comparison to other areas in the Piedmont Triad.

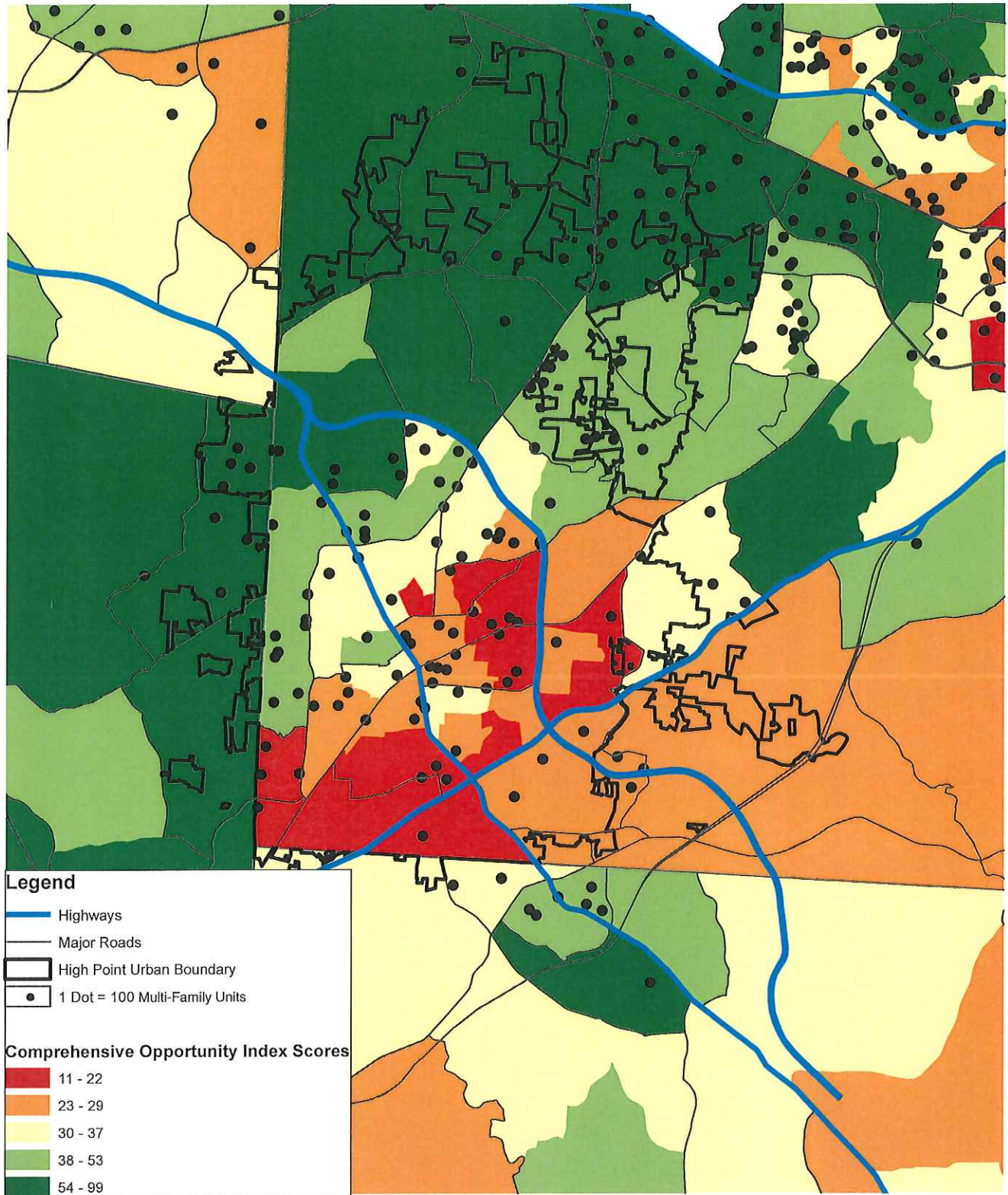
On the following map, each dot represents 50 multi-family housing units, which serves as a rough proxy for affordability. Unlike many of the other urban areas in the Piedmont Triad, High Point's multi-family units are concentrated in areas of moderate opportunity rather than in areas of low opportunity. However, there are fewer multi-family housing units in the areas of High Point with higher levels of opportunity.

Figure 7 : Change in Affordable Rental Housing, 2000-2010

Units Renting for: Region	2000	2010	Change	
			#	%
Less than \$500	72,682	41,995	-30,687	-42.2%
\$500 to \$699	56,643	64,132	7,489	13.2%
\$700 to \$999	26,701	57,151	30,450	114.0%
\$1000 or More	6,223	22,384	16,161	259.7%
High Point				
Less than \$500	5,947	2,797	-3,150	-53.0%
\$500 to \$699	4,718	4,415	-303	-6.4%
\$700 to \$999	2,111	5,608	3,497	165.7%
\$1000 or More	430	2,518	2,088	485.6%

Source: U.S. Census Bureau, Census 2000 (H062) and 2006-2010 American Community Survey (B25063)

MAP 8:
MULTI-FAMILY UNITS AND AREAS OF OPPORTUNITY IN HIGH POINT



Source: 2010 American Community Survey, HUD
 Calculations by Mullin & Lonergan Associates



0 0.5 1 2 Miles

For Section 8 Housing Choice voucher holders, finding housing in a higher opportunity area may be difficult and pose a concern from a fair housing perspective. Mapping the locations of Section 8 vouchers reveals that voucher holders are concentrated in low opportunity areas within High Point. The largest cluster of voucher holders was in central High Point, in the neighborhoods east of the downtown area. The clusters of voucher holders are in areas ranging from moderate opportunity to extremely low opportunity, but are predominantly in the lower scoring areas. Conversely, there are very few Section 8 voucher holders in the higher opportunity areas of High Point. This indicates that Section 8 voucher holders are concentrating in areas that have inferior resources and economic characteristics, decreasing the potential for upward mobility and perhaps indicating issues with accessing affordable housing in High Point's higher opportunity areas.

The following map plots the locations of Section 8 voucher holders against the backdrop of opportunity scores in High Point.

For households wanting to invest in buying a home rather than renting, minority household incomes may tend to be too low to achieve homeownership. In High Point, the median household income for Whites was \$53,039, \$30,788 for Blacks, and \$35,967 for Hispanics. The maximum purchase price a household making the median income for a White household could pay is approximately \$182,000. A household making the median income for a Black household in High Point could pay approximately \$60,000, and a household making the median income for a Hispanic household in High Point could pay approximately \$88,000. At these thresholds, only the average median income of High Point's White households is high enough to buy a house in High Point priced at the median value. The maximum purchase price for Blacks in High Point is extremely low—the second-lowest out of any study areas in the Piedmont Triad—and there are likely very few homes in High Point priced at \$62,000 and under. This lack of affordable housing may force some households into renting, becoming cost burdened, living in overcrowded or substandard conditions, or a combination of these factors. Minorities also face lower rates of mortgage approval in the area: the approval rate in the Piedmont Triad was 65.4% for Whites but only 48.4% for Blacks and 51.4% for Hispanics.

Figure 8 : Change in Affordable Rental Housing, 2000-2010

Region	Household Income	Monthly Mortgage Payment				Maximum Affordable Purchase Price
		Principal and Interest	Real Estate Taxes	Homeowner's Insurance and PMI	Total Debt Service*	
Region	\$43,970	\$595	\$111	\$80	\$1,286	\$133,000
Whites	\$49,269	\$720	\$134	\$80	\$1,434	\$161,000
Blacks	\$31,318	\$280	\$52	\$80	\$912	\$62,500
Asians	\$48,850	\$712	\$133	\$80	\$1,425	\$159,000
Hispanics	\$31,556	\$286	\$53	\$80	\$919	\$64,000
High Point	\$43,594	\$582	\$108	\$80	\$1,270	\$130,000
Whites	\$53,039	\$814	\$152	\$80	\$1,546	\$182,000
Blacks	\$30,788	\$269	\$50	\$80	\$899	\$60,000
Asians	\$42,679	\$559	\$104	\$80	\$1,243	\$125,000
Hispanics	\$35,967	\$394	\$73	\$80	\$1,047	\$88,000

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25077, B25103, S1903)

MAP 9:
SECTION 8 VOUCHER HOLDERS AND AREAS OF OPPORTUNITY IN HIGH POINT

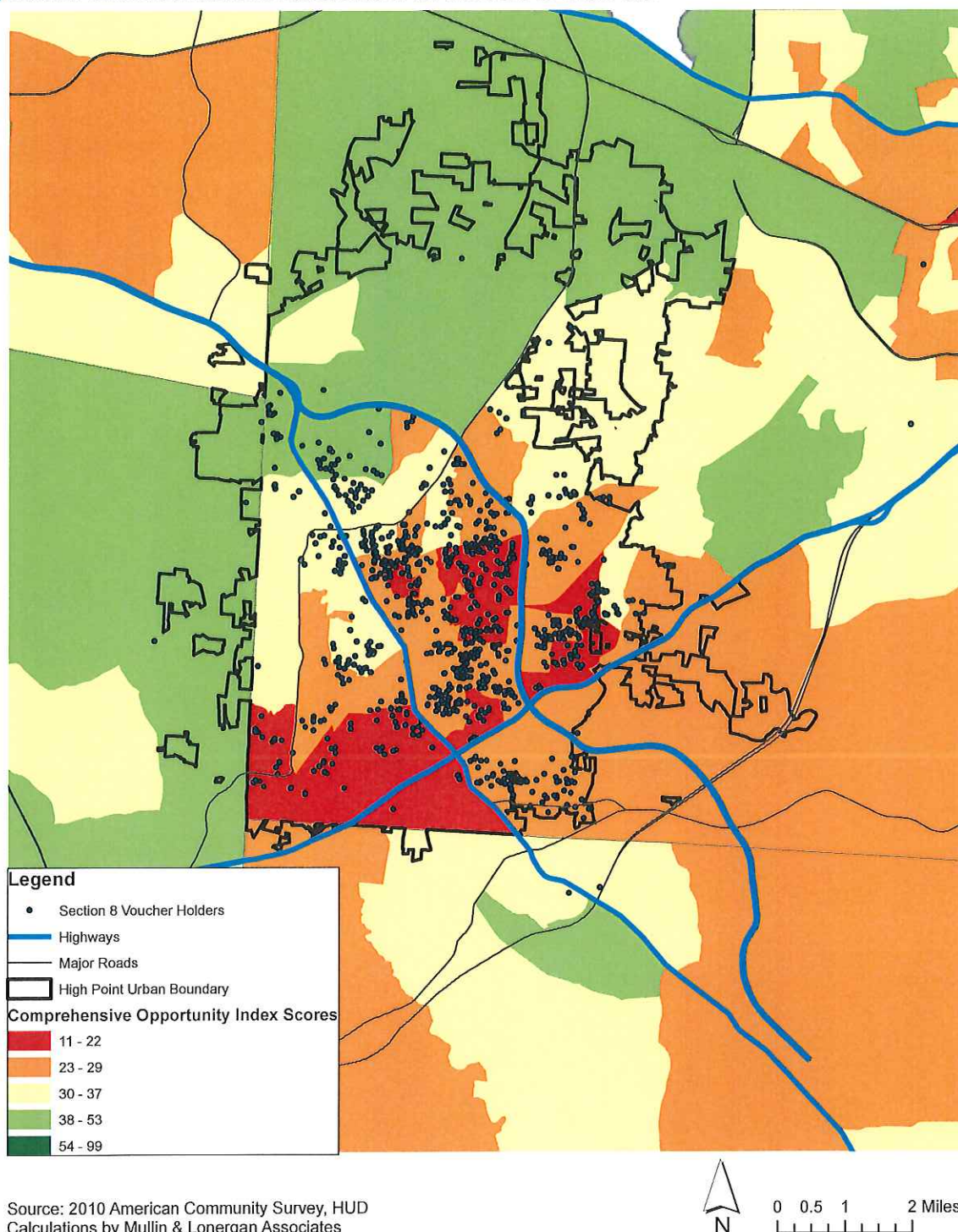


Figure 9 : Locations of Section 8 Voucher Holders by Opportunity Score, High Point

	Very Low		Low Opportunity		Moderate		High Opportunity		Very High		Total
	#	%	#	%	#	%	#	%	#	%	#
High Point Section 8 Voucher Holders	371	25.96%	485	33.94%	306	21.41%	125	8.75%	106	7.42%	1429

Impediments to fair housing choice

High Point faces several policy-related impediments that either directly or indirectly limit fair housing choice

- The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
- The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute
- The zoning ordinance restricts homeless shelters to non-residential districts
- The zoning ordinance requires an overlay district or special permit for manufactured housing
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- Sixteen out of the City's 67 block groups (23.8%) were identified as RCAP areas
- The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
- A lack of paired testing in the housing market

Fair Housing Priorities

High Point can take action to address important fair housing priorities

The demographic analysis, opportunity mapping, and housing market analysis found prevalent racially concentrated areas of poverty (or areas approaching these criteria), significant disparities in access to opportunity, and a disproportionate housing need based on protected class status. Factors contributing to these issues in High Point are:

1. A need for expanded public transportation to provide RCAP residents and other lower income residents with access to higher opportunity areas and community assets

The need for expanded public transportation service was given the highest priority because it can be implemented incrementally and beginning within a potentially shorter time frame. The extension of public transit routes and expansion of service hours will require capital investment over time.

2. a need for greater affordable and accessible housing opportunities, both rental and sales units, in higher opportunity areas

The need for greater affordable and accessible housing opportunities in higher opportunity areas may require less public financing than expanded public transportation, but it will require a well-designed public education campaign against residential opposition to the development of affordable housing in some areas. This initiative will require time and the investment of significant human resources in the form of political and community leadership to play key roles in any campaign.

3. A need for sustainable employment opportunities within, or in closer proximity to, racially concentrated areas of poverty

The need for sustainable employment opportunities in or near RCAPs will require significant capital investment and time, including planning for potential revitalization, redevelopment and re-use of land and structures that are appropriate for new commercial and industrial uses.

These three priorities have the potential for mitigating each of the determinants of fair housing outlined in the AFH. All three priorities will require financial investments, strong political leadership, substantial changes to long-standing public policies, long-term public education, and lengthy implementation periods. However, none of these challenges should be used as reasons to dismiss the possibility of implementation of any one priority and the potential for cataclysmic change at the local and regional levels.

One of the most pragmatic ways to address these goals is through overcoming policy barriers. High Point's zoning ordinance was reviewed and benchmarked to uncover and systematically score its effectiveness in affirmatively furthering fair housing and minimizing discriminatory practices. On a rating of 1 to 2, with 1 being the lowest possible risk for potentially discriminatory provisions and 2 being the highest, High Point scored a 1.36. This puts High Point's ordinance at a moderate risk relative to discriminatory provisions for housing and members of the protected classes.

There are several practical direct actions the City of High Point can undertake in a short time frame in order to affirmatively further fair housing. Firstly, High Point can continue to incorporate required compliance with the federal Fair Housing Act in all HUD program sub-recipient agreements. Secondly, High Point can adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing. Thirdly, High Point should confirm that their HOME Program includes and implements the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods.

A Local Fair Housing Action Plan: Goals and Strategies for High Point

The goals and strategies established in this section are tailored to High Point for inclusion in its Five-Year Consolidated Planning process.

Goal 1: Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes

Strategy 1: Examine revising the City's hub-and-spoke transportation routes to more readily connect areas in the South with employment centers in the North

Strategy 2: Prioritize the creation of a citywide sidewalk network within the capital improvement plan in order to increase multi-modal transit access

Strategy 3: Expand public transportation routes to serve new multi-family development

Goal 2: Expand affordable housing opportunities in higher opportunity areas

Strategy 1: Invest and prioritize the City's HOME, CDBG and other grant funding as appropriate to provide incentives for the development of affordable family rental housing in higher opportunity areas

Strategy 2: Modify the City's homebuyer assistance program to increase the individual down payment amount available to eligible purchasers in higher opportunity / higher cost neighborhoods

Strategy 3: Incorporate the Site and Neighborhood Standards criteria of the HOME program into the local site selection process

Strategy 4: Partner with High Point Housing Authority to strategically select parcels for affordable family rental housing development in higher opportunity areas

Strategy 5: Complete the Development Ordinance Update and incorporate innovative provisions such as accessory dwelling units by-right, single-room occupancy (SRO) units and micro-units regardless of income

Strategy 6: Provide market-based density bonuses and other incentives to encourage mixed-income residential developments

Strategy 7: Explore the possibility of establishing a local trust fund to directly address the City's affordable housing needs

Strategy 8: Amend the zoning ordinance to include a reasonable accommodation policy for persons with disabilities

Goal 3: Increase the awareness of fair housing education and outreach

Strategy 1: Continue the City's initiatives to provide education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Seek out immigrant populations with limited English proficiency for fair housing education

Strategy 3: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients that engage in discriminatory housing behavior

Strategy 4: Conduct paired testing in the rental housing market

Goal 4: Improve the physical environment in racially concentrated areas of poverty

Strategy 1: Continue the City's Lead Safe High Point Program to remediate lead hazards from affordable housing occupied by lower income families with children

Strategy 2: Continue the City's Community Based Initiatives Program to improve the quality of life for persons and households in lower income neighborhoods

Strategy 3: Continue to support the neighborhood organizations that work to revitalize lower income neighborhoods and empower residents

Strategy 4: Study the feasibility of establishing a land bank in the City as a means of redeveloping parcels for residential and non-residential land use where existing infrastructure is available

Strategy 5: Expand the City's owner-occupied housing rehabilitation program to extend beyond primarily weatherization and code enforcement violations to approach home repair more comprehensively

Strategy 6: Develop an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing

Strategy 7: Continue the City's Homeownership Education Classes for homeowner / homebuyer / financial counseling for lower income households, minority households and households with limited English proficiency (LEP) for the purpose of educating owners and buyers on predatory lending, high-cost lending and financial management

Strategy 8: Allocate CDBG assistance for public facilities and infrastructure in RCAP and near-RCAP areas

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