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## Goldsboro's Response to Comments received through the Citizen Participation Process FY20-24 ConPlan and FY20-21 AAP

Eligible state and local governments receive annual block grants for community development and affordable housing from the U.S. Department of Housing and Urban Development (HUD). These grants include the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS Grant (HOPWA). A key feature of these grants is the Grantee's ability to choose how the funds will be used. For each program, HUD describes a broad range of eligible activities. The state or local governments determine which of the eligible activities will best serve the needs of their community. In order to determine the most pressing needs and develop effective, place-based market-driven strategies to meet those needs, HUD requires Grantees to develop a Consolidated Plan (ConPlan) and Annual Action Plans (AAPs).

In May 2012, HUD's Office of Community Planning and Development (CPD) introduced a collection of online tools to help Grantees create market-driven, leveraged housing and community development plans. The template is designed to encompass statutory requirements for all four annual block grants and provides a number of benefits to Grantees, including:

- A uniform, web-based format to help Grantees ensure their ConPlan and AAP includes all the required elements per the regulations. The template also includes a Quality Check that Grantees can use to review the plan for missing information and discrepancies before submitting the final version to HUD.
- With the incorporation of the ConPlan and AAP into Integrated Disbursement and Information System (IDIS) Online, all of the key reporting elements of the grants management cycle are integrated into one system. This helps ensure cohesiveness between the goals described in the ConPlan and AAP and the outcomes tracked in IDIS and reported in the Consolidated Annual Performance and Evaluation Report (CAPER).
- Many of the data tables within the ConPlan and AAP template are pre-populated with the latest housing and economic data. The data is provided to help Grantees develop their funding priorities in the Strategic Plan and to save time in searching for and compiling the data.
- The ConPlan and AAP template is integrated with the CPD Maps tool. The maps and data sets available in CPD Maps can help Grantees assess market conditions and present the information in a compelling fashion. CPD Maps is publicly available to ensure that community stakeholders will also have access to the same data sets. The ConPlan and AAP template allows Grantees to easily insert maps and data tables from CPD Maps throughout the document.

As mentioned previously, the IDIS Online template is designed to encompass statutory requirements for all four annual block grants; however, Grantees are only required to provide content to the applicable HUD block grants passed through CPD to them to administer. Goldsboro administers only CDBG and HOME block

grants and has provided the required level of information deemed by HUD's IDIS Online template to ensure the ConPlan and AAP has set general priorities for allocating funds among different activities and needs. When applicable, Goldsboro has added additional content in sections associated to latest pre-populated housing, community, population characteristics, and economic data for more context to Goldsboro's reasoning for priorities, goals, and projects in the ConPlan and AAP for the broad picture towards LMI individuals and families. Goldsboro has, in some sections, consulted with the lead agency of other HUD block grants not under Goldsboro's oversight for some content to compliment data associated to CDBG and HOME. Case in point, Goldsboro is not a recipient of ESG block grant funds; however, the agency Eastpointe, LME is and falls under the administration of North Carolina Balance of State (BoS) Continuum of Care (CoC). Goldsboro, as a means of consultation, may meet or have conversations with the members of BoS CoC, staff of Eastpointe, LME and members of the Neuse Regional Committee along with other service providers who are recipients of ESG block grant funds. Although, Goldsboro has no authority over these agencies, committees, or providers. Goldsboro has met on numerous occasions with local government agencies, homeless services providers and community agencies on the matter of a women's shelter along with other needs and this still continues to be an effort of Goldsboro and stakeholders. The ConPlan and AAP within **SP-60 Homelessness Strategy - 91.215(d)** on pages 74-75 and **AP-65 Homeless and Other Special Needs Activities - 91.220(i)** on pages 102-103 provides context to Goldsboro's strategic goals to assist homeless service providers and agencies to combat homelessness.

Similarly, Goldsboro and the Housing Authority of the City of Goldsboro (HACG) may both receive HUD funding and be required to develop a five-year and one-year plan but they are different in the aspect of HACG funding is passed through the Office of Public and Indian Housing. However, Goldsboro and HACG are expected by our respective oversight agencies to consult with one another's Plans and efforts to ensure with the consistency of Goldsboro's ConPlan and preceding AAPs. Goldsboro's ConPlan and AAP does strive to ensure that priorities, goals, and projects also benefit the residents residing within public assisted housing similarly to any other LMI individual and family who do not reside within public housing.

Goldsboro, as a Grantee of CDBG and HOME, strive to meet the overarching goal of HUD's Community Planning and Development (CPD) programs covered by the ConPlan and the AAP "to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities," principally for low- and moderate-income persons. In this effort, HUD looks to its state and local government Grantees to "extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production of affordable housing."

This is one of the reasons Goldsboro has developed a Citizen Participation Plan (CPP) that enhances citizens', stakeholders', and elected officials' awareness to increase citizen feedback, buy-in, and support of ConPlan and AAP activities. While HUD allows Grantees flexibility to determine their own citizen participation process, Goldsboro reviews and submits to HUD its CPP annually. This is to ensure citizens in most need of supportive services and those who stand to benefit the most from activities undertaken as part of the CDBG and HOME programs have the opportunity to participate. HUD's Consolidated Submission for Community Planning and Development Programs requires local jurisdictions to do the minimum, but not limited to:

1. Before the jurisdiction adopts a ConPlan and AAP, the jurisdiction will make available to residents, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. A jurisdiction must state when and how the jurisdiction will make this information available.

2. The jurisdiction in a manner that affords its residents, public agencies, and other interested parties a reasonable opportunity to examine the ConPlan and AAP contents and to submit comments.
3. The requirement for publishing plans may be met by publishing a summary of document in one or more newspapers of general circulation, and by making copies of document available on the Internet, on the jurisdiction's official government Web site, and as well at libraries, government offices, and public places. The summary must describe the content and purpose of the ConPlan and AAP, and must include a list of the locations where copies of the entire proposed document may be examined. In addition, the jurisdiction must provide a reasonable number of free copies of the plan (as applicable) to residents and groups that request it.
4. The citizen participation plan and process must provide a period, not less than 30 calendar days, to receive comments from residents of the community on the ConPlan and AAP (as applicable).
5. The jurisdiction's citizen participation plan and process must provide for at least one public hearing/meeting during the development of the ConPlan and AAP. To obtain the views of residents of the community on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing (AFH), the citizen participation plan and process must provide that at least one of these hearings/meetings is held before the proposed ConPlan and AAP are published for comment. Over the entire plan year, at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year (i.e., one hearing/meeting either during the ConPlan or AAP and the second hearing/meeting during the CAPER). Together, the hearings/meetings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and a review of program performance.
6. The citizen participation plan and process can require the jurisdiction to consider any comments or views of residents of the community received in writing, or orally at the public hearings/meetings, in preparing the final ConPlan and AAP (as applicable). A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final ConPlan and AAP (as applicable).

Goldsboro's CPP provides the means by which citizens can assist with problem identification, propose solutions to problems, set goals and determine priorities to name a few as part of Goldsboro's programs. Goldsboro's primary avenues for public notification and participation during this cycle of the ConPlan and AAP were:

- ✓ Public publications encouraging attendance to the May 22, 2020 virtual public meeting before the Commission on Community Relations and Development and the June 15, 2020 public hearing before the Goldsboro City Council along with the solicitation for public comments during the thirty-day public comment reviews period from May 27, 2020 until 5:00 pm on June 25, 2020. All public publications were placed in the Goldsboro News Argus. Respectively on May 12, 2020; May 30, 2020; and May 15, 2020 as required by the CPP at least 10 days prior, but no more than 30 days to the date of said public meeting, public hearing, or public comment review period. Public publications were placed on Goldsboro's website and Facebook page, as well.
- ✓ Public and private agencies along with members of Goldsboro City Council also placed Goldsboro's public publications on their respective Facebook and YouTube pages as a means to inform and encourage engagement from citizens in the citizen participation process. Some of these public and

private agencies even facilitated separate public participation outreach efforts in order to collectively provide Goldsboro with additional citizen input. This community-driven stakeholder collaboration is a perfect example of HUD's goal for leveraging upon the outreach efforts of existing planning efforts during a Grantee's citizen participation process. Goldsboro has obtain documentation of these separate preexisting planning efforts to be included within the final ConPlan and AAP.

- ✓ Commission on Community Relations and Development (CCRD) has served as a citizen input and distribution mechanism of information for the community while serving in an advisory capacity to Goldsboro throughout the entire program year. In addition, Goldsboro has always provided and will continue to provide citizens and stakeholders the opportunity to participate by providing their comments to the Community Relations Director, Assistant City Manager, and City Manager along with encouraging citizens and stakeholders to share their comments to members of City Council either by a formal meeting or informally conversation. CCRD minutes are current and can be provided upon request.
- ✓ Goldsboro decided to obtain a sample size or polling of additional analytical data through two surveys (stakeholders and residents) — this process is not required by HUD for a ConPlan or AAP. Based on HUD regulations pertaining to citizen participation for local government, Goldsboro has met the requirements for development of the current ConPlan and AAP.
- ✓ Citizens residing within designated target areas are encouraged to comment on needs and priorities through existing or newly created neighborhood associations and community watch groups. Goldsboro's CPP states, in conjunction with the Housing Authority of the City of Goldsboro (HACG) Goldsboro will work to encourage the participation of public and assisted housing residents in providing input to the ConPlan and AAP. This is a mutual shared understanding that has afforded Goldsboro the unsolicited sharing of Goldsboro's public publications to HACG Facebook page by the HACG outstanding executive and program management team. Case in point, HACG assisted Goldsboro with encouraging their residents residing in public and assisted housing to participate in the May 22, 2020 virtual public meeting by voluntary sharing Goldsboro's public publication on the virtual public meeting to its Facebook page. Goldsboro has obtain documentation of this outreach effort to be included within the final ConPlan and AAP. However, Goldsboro will definitely ensure a formal request to share public publications with HACG residents are made (as applicable).

As mentioned within the ConPlan and AAP from pages 2-12, Goldsboro has gained input for stakeholders and citizens throughout the entire program year by many avenues and has met HUD's mandated minimum requirements. When applicable, Goldsboro will utilize the quarterly Citizens Newsletter for another avenue for citizen participation. It should be noted Goldsboro and Wayne County churches with email address on file are included on email blitzes for the Community Relations Department. When applicable, Goldsboro will explore and implement non-English speaking publications. Goldsboro, as required by HUD, does identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate within publications. But as an extra reassurance Goldsboro will provide an addition line to this fact within each publication in Spanish moving forward.

Goldsboro recognizes that each neighborhood's housing, economic, and social needs are unique but are interconnected. Therefore, as part of Goldsboro's approach there will be a focus on all neighborhoods as a citywide geographic area through multiple activities in a concentrated and coordinated manner. In an effect, to empower Goldsboro's most economically distressed neighborhoods a place-based priority will be utilized, as well, for a comprehensive, place-based strategy with coordinated action between Goldsboro and other

stakeholders and resources within Goldsboro's designated Opportunity Zones (Census Tracts 3719100: **1500**; **1800**; and **1900**). These designated Opportunity Zones are also identified as highly concentrated areas of LMI population and minorities. With the proposed rule changes to CDBG and HOME programs to create flexibilities to incentivize their use in designated Opportunity Zones,<sup>(1)</sup> Goldsboro will direct and leverage CDBG and HOME funds for preservation and creation of affordable housing and attracting revitalizing investments that can create jobs, business expansion, and new business development to Goldsboro.

- (1) Opportunity Zones are economically distressed communities, defined by individual census tract, nominated by America's governors, and certified by the U.S. Secretary of the Treasury via his delegation of that authority to the Internal Revenue Service. Under certain conditions, new investments in Opportunity Zones may be eligible for preferential tax treatment. There are 8,764 Opportunity Zones in the United States (again Goldsboro has three), many of which have experienced a lack of investment for decades. The Opportunity Zones initiative is not a top-down government program from Washington but an incentive to spur private and public investment in America's underserved communities.

Goldsboro contends the above geographic priority areas also mentioned within **SP-10 Geographic Priorities - 91.215(a)(1)** on pages 57-58 and **AP-50 Geographic Distribution - 91.220(f)** on page 99 meets HUD's standards for identifying local target areas city-wide, of how funding will be allocated geographically, but also provides the caveat of designating target areas (i.e., Opportunity Zones). Again, this approach allows Goldsboro to focus on neighborhoods as a whole while addressing the households living in the local target areas whose incomes are at 80% or below area median income (AMI) – as required of CDBG and HOME block grants. In addition, to addressing the housing, community, economic development needs of residents identified as greatly disproportionate within designated Household Area Median Family Income (HAMFI) and Area Median Income (AMI) within **NA-05 to NA-50 Need Assessment - 91.205(a,b,c)** on pages 13-35 and within **MA-05 to MA-65 Market Analysis - 91.205(a,b,c)** on pages 35-57 of the ConPlan and AAP.

Goldsboro's ConPlan and preceding AAPs are long-term housing focus plans outlining the availability of expected resources to achieve priorities on projects and programs (mainly housing) that meet program eligibility requirements, have long-term impacts on LMI individuals and families, and help address other federal, state, and local priorities, such as fair housing choice and sustainability. It should be noted that for CDBG and HOME block grants low-to-moderate income LMI refers to households with cash-income at or below 80% of Goldsboro area median income within a given grant year – additional information on income levels characteristics can be located within **NA-05 to NA-50 Need Assessment - 91.205(a,b,c)** on pages 13-35. The ConPlan and AAP discusses areas of concentration of LMI communities, concentrations of racial and ethnic minority groups, and Goldsboro's plans to address these needs, including, but not limited to: Goldsboro partnerships with non-profits, CHDOs, and developers; use of regulated Urgent Repair program as funded by North Carolina Housing Finance Agency (NCHFA); and counseling and education regarding improving financial capacity and homeownership for LMI individuals and families. It should be noted that NCHFA designates the amount Goldsboro will be allocated for the Urgent Repair program if granted; however, Goldsboro has budgeted for the historical allocation within the ConPlan and preceding AAPs. HUD requires a jurisdiction to identify the priority needs of the jurisdiction and describe strategies and goals that the jurisdiction will undertake to serve the priority needs. Within **SP-25 Priority Needs - 91.215(a)(2)** pages 58-61, Goldsboro has identified four priority needs with all four needs designated as priority level of "High".

Next, as required by HUD, Goldsboro within **SP-45 Goals - 91.215(a)(4)** pages 68-71 and **AP-20 Annual Goals and Objectives - 91.220(c)(3)&(e)** pages 82-85 provides the associated goals designed to address the four priority needs. These goals are only numerically labeled and provide anticipated goal outcomes in

quantitative terms of what Goldsboro hopes to achieve. Goldsboro is required by HUD to state the five-year overall goals located in **(SP-45 Goals - 91.215(a)(4))** and preceding the annual overall goals located in **(AP-20 Annual Goals and Objectives - 91.220(c)(3)&(e))**. Finally, Goldsboro is required by HUD to provide a concise summary of the eligible programs or activities with enough detail for each project so that HUD may determine that the project is an eligible use of the proposed funding source. Goldsboro is required to use one or more of the identified priority needs and goal outcome indicators to describe the planned accomplishments and indicate a target date for realizing the accomplishment. This information is located within **AP-35 Projects - 91.220(d)** on pages 86-98 and provides detail for each project so that HUD may determine that the project is an eligible use of the proposed funding source.

Cost burden and severe cost burden, for both renter and owner households, are the most common housing problem in Goldsboro. Goldsboro has continued to experience a decline in population growth. Goldsboro's population and household decline has been driven by neighboring cities and communities' progressive diverse economy, availability of multifamily unit developments for working individuals and families, and Goldsboro's shortage of affordable and decent housing from aging housing stock and loss through two Hurricanes (Matthew and Florence) to name a few. Goldsboro is finding that most households with disproportionately greater needs are implementing strategies contributing to underlying issues in health and mental care, safety, generational poverty and amongst others to afford housing and daily living costs.

Goldsboro anticipates receiving federal and state funds over the cycle of the ConPlan and preceding AAPs of **\$4,725,034** to achieving priorities on projects and programs (mainly housing) that meet program eligibility requirements, having long-term impacts on LMI individuals and families, and helping address other federal, state, and local priorities, such as fair housing choice and sustainability. Each year, Goldsboro must describe the work it plans to undertake with the grant funds on the Projects page of the AAP. Each project must address at least one goal described in the ConPlan's Strategic Plan. The project information provided in the AAP template will carry forward into the other sections of IDIS Online for the ConPlan and AAP. Goldsboro is still required to add activity-level data into IDIS Online for the ConPlan and AAP that can be similar in nature and content.

Therefore, Goldsboro's ConPlan and preceding AAPs are structured, whereas **Goals 1, 2, 3, 4, 6, and 7** will address "Attainable Housing Development & Preservation" for LMI individuals and families through activities that will extend the lifespan or increase attainable housing units citywide and local target areas (i.e., acquisition, new construction and/or rehabilitation activities). Another, activity Goldsboro considers to be instrumental to expanding affordable rental housing options is Goldsboro's Rental Housing Development project. Goldsboro assessed there is a lack of affordable rental housing options, and in this cycle of the ConPlan and preceding AAPs there is an effort to leverage HOME funds to produce more multifamily rental developments for LMI individuals and families. Goldsboro has provided more context to this subject matter within the sections of the **Need Assessment (NA)** and **Market Analysis (MA)** along with **AP-38 Project Summary - 91.220(d)** pages 87-89 and 91-97 to support the priority need of "Attainable Housing Development & Preservation". **Goals 1, 2, 3, 4, 5, 6, and 7** also addresses "Neighborhood Stabilization", still geared towards aspects of housing, by creating flexibilities to incentivize CDBG and HOME funds use in designated Opportunity Zones. Goldsboro will direct and leverage these funds for preservation and creation of affordable housing and attracting revitalizing investments that can create jobs, business expansion, and new business development within those designated Opportunity Zones. **AP-38 Project Summary - 91.220(d)** pages 87-97 support the priority need of "Neighborhood Stabilization" in more context.

Additionally, **Goals 1, 2, 3, 4, and 7** addresses “Equity & Affirmatively Furthering Fair Housing” another tool to impact aspects of housing through Goldsboro’s desire to work proactively to reduce and mitigate barriers to fair housing choice and to affirmatively further fair housing choice, including fostering equity in neighborhood access to opportunities. Goldsboro, over the cycle of the ConPlan and preceding AAPs, has allocated **\$4,053,288** or **86%** of all anticipated funds to address viewpoints of housing needs by goals and projects associated to Attainable Housing Development & Preservation, Neighborhood Stabilization, and Equity & Affirmatively Furthering Fair Housing. It should be noted that of the **\$4,053,288** only **\$480,123** is contributed to Public Facilities & Improvements (City-Owned) over the cycle of the ConPlan and preceding AAPs to support the needs of Goldsboro’s residential sustainability growth and, at the same time, replacing existing facilities/infrastructure that have deteriorated due to age or have become obsolete within LMI census tracts/block groups. Still geared towards expanding development and preservation of affordable housing.

Although HUD allows for CDBG funds to be used for down payment assistance up to 50% of the lender required down payment amount, Goldsboro has historically used HOME funds for down payment and closing cost assistance. This is simply due to the fact HOME allows for assistance up to 100% of the lender required down payment amount and closing costs. Potential homebuyers within Goldsboro who are LMI individuals and families require more than 50% assistance or subsidies towards down payment and closing cost assistance to purchase a home. Over the cycle of the ConPlan and preceding AAPs, Goldsboro has allocated **\$779,319** towards Increase Access to Affordable Homeownership Option more information is located within **SP-45 Goals - 91.215(a)(4)** pages 69 and **AP-38 Project Summary - 91.220(d)** pages 87, 88, and 92-94. Based on HUD regulatory eligibility and national objectives, HOME funds are the most appropriate federal funding source to fund activities within the area of multifamily and single-family housing for Goldsboro at this time.

As regulated by HUD, **Goals 7** allows Goldsboro to only allocate each preceding AAPs no more than **20%** of CDBG and **10%** of HOME program funds (most recent grant, not prior year grant funds) towards program administration costs to support ConPlan and AAPs objectives. Goldsboro has only been awarded Community Development Block Grant – Coronavirus (CDBG-CV) for grant year 2020-2021 in the amount of **\$206,554** for which Goldsboro is only allowed to allocate **20%** or **\$41,310** of those program funds towards planning administration costs to support the COVID-19 Public Service Grants information is located within **AP-38 Projects Summary - 91.220(d)** on pages 97-98. Over the cycle of the ConPlan and preceding AAPs a total of **\$494,505 (\$314,703 from CDBG; \$111,494 from HOME; and \$41,308 from CDBG-CV)** has been allocated towards program administration costs – this would equate to **10%** of the total ConPlan cycle and preceding AAPs’ budget of **\$4,725,034**. Additional context to this information can be located within **SP-45 Goals - 91.215(a)(4)** on page 71. It should be noted that Goldsboro’s ConPlan and preceding AAPs budgeted planning administration costs are in compliance with HUD’s regulatory caps.

Based on the obvious impact on residents from COVID-19 and on recommendations received from many stakeholders, the CDBG-CV eligible activities funded under the CARE Act focuses on providing needed assistance with majority towards rental and utility aid along with assistance with food insecurity, medication and healthcare services, and supporting childcare for essential workers within Goldsboro facing hardships from COVID-19. Case in point, an email received from Matthew Whittle, Habitat for Humanity of Goldsboro-Wayne and Co-Advocate of WAYne Forward Group, provided to Goldsboro on April 14, 2020 expressed, “that Habitat would be very supportive of all of this funding going to support housing needs right now – specifically rental assistance (and by extension then, landlord assistance) and homeowner mortgage assistance for folks facing layoff or reduction in hours”. With the County of Wayne utilizing CARES Act funds received to provide free COVID-19 testing – it definitely seemed logical to fill in the gaps by funding the proposed agencies and activities associated to COVID-19, refer to **AP-38 Projects Summary - 91.220(d)** on pages 97-98 for more information.

Lastly, **Goals 4, 5, and 7** equally address "Non-Housing Community Development" by providing and expanding essential services and improving public infrastructure that support LMI individuals and families (i.e., education, employment and training programs, health services, or public enhancements to name a few). Goals and projects associated to Non-Housing and Community Development make up **\$671,746** or **14%** of Goldsboro's overall cycle of the ConPlan and preceding AAPs anticipated funds. Over the cycle of the ConPlan and preceding AAPs the **\$671,746** or **14%** encompasses **\$336,510** for the debt service of the WA Foster Center Construction for at least three more years, ending with the final payment in fiscal year 2022-2023, and **\$335,236** for public services activities to provide and expand essential and employment trainings. However, one can perceive how addressing and expanding LMI individuals and families' essential needs and employment training can attribute to attaining or preserving of housing for individual households. As a comprehensive strategy to help LMI individuals and families overcome barriers to self-sufficiency. The context for self-sufficiency is more than quality and stable housing, it also includes health and mental wellness, employment or career readiness, access to useful infrastructure, or pursuing higher education to develop new skills.

HUD's Office of Community Planning and Development (CPD) does not require Grantees to submit a ConPlan with an Analysis of Impediment (AI) simultaneously. An AI is recommended to be conducted once every 5 years to look at disparities in access to housing and economic opportunities for protected classes (race, color, religion, national origin, sex, disability, familial status). Goldsboro's last AI was completed by ASK Development Solutions and was submitted to HUD December 2015. In December 2019, Goldsboro began the process for securing a qualified firm to complete an AI, to evaluate barriers to housing choice in Goldsboro. After much consultation between Goldsboro, HUD, and the interested firms, Goldsboro has selected UNC Greensboro Center for Housing and Community Studies to aid Goldsboro and community stakeholders in developing housing goals that will ultimately increase fair housing choice, build opportunity for all residents, and strengthen communities. Goldsboro has ensured the HUD CPD Representative assigned to Goldsboro was updated throughout this process and Goldsboro has not been informed of any issues or concerns. Goldsboro ConPlan and AAP provides Goldsboro anticipated strategies within **SP-55 Strategic Plan Barriers to Affordable Housing – 91.215(h)** on pages 73-74 and **AP-75 Action Plan Barriers to Affordable Housing – 91.220(j)** pages 104-105. Goldsboro perceives creating affordable housing in areas of opportunities and promoting equitable and accessible housing options as the first step to combatting Not In My Back Yard (NIMBY). If the AI being conducted by UNC Greensboro Center for Housing and Community Studies identifies NIMBYs as a current barrier to affordable fair housing and provides recommended strategies to eliminate this barrier. Goldsboro within its capacity will seek to proactively eliminate or at the least proactively challenge NIMBY and any other identified barrier to affordable fair housing through **AP-35 Projects - 91.220(d)** on pages 87-88 within Project 1: Fair Housing and Project 2: Housing Counseling along with separate local funds within the Community Relations Department.

Each year, Goldsboro is required to complete and submit to HUD for its review a Consolidated Annual Performance and Evaluation Report (CAPER) reporting on accomplishment and progress towards ConPlan goals. After, HUD has completed its review Goldsboro receives an Annual Community Assessment of Community Planning Department Program Performance report – one area HUD thoroughly reviews is Grantee's disbursement of fund timeliness test. Grantees are considered timely if they have no more than the equivalent of 1.5 times the most recent grant in their US Treasury account 60 days prior to the end of the program year. In Goldsboro's case, for the last 10 years and more, it has met the spending requirement to pass the test each program year as monitored by HUD.



Due to the restrictive use of funds placed on the HOME program to focus on projects and/or activities designed exclusively to create affordable housing for LMI households. Goldsboro has historically each year carried over a substantial amount of prior years' HOME funds when it has not undertaken large development projects or when there has not been numerous potential homebuyers that can qualify for a mortgage loan from a Lender. Goldsboro does not qualify potential homebuyers seeking to obtain a mortgage loan as part of a Lender's underwriting requirements. Goldsboro's last 10 years and more of Annual Community Assessment of Community Planning Department Program Performance reports, also have indicated that all HOME spending requirement met HUD's standards and national objectives to focus on projects and/or activities designed exclusively to create affordable housing for LMI households.

Goldsboro's overall ConPlan and preceding AAPs concept is meant to be a comprehensive and multi-agency approach. Therefore, Goldsboro will look to collaborate and fund agencies that have the institutional delivery capacity to assist Goldsboro in carrying out the ConPlan and preceding AAPs; in accordance to, HUD's rules and regulations. HUD defines the target of 70% as all CDBG funds included in a designated fiscal year of annual grants allocated to Goldsboro, except for funds used by Goldsboro for program administration or for planning activities, to meet the required aggregated percentage of not less than 70% of CDBG funds used for activities that benefit LMI persons. The "Target" Goldsboro has set locally is 90 percent or greater of the HUD LMI benefit test annually (again 70%). Goldsboro's target of 90% could allow for 10% of funds towards activities that do not directly benefit LMI persons. This is allowable by HUD; however, Goldsboro for the last four years and more has used 100% of CDBG funds for activities that benefit (LMI) individuals and families.

The IDIS Online template includes a Quality Check that Grantees can use to review the ConPlan and AAP for missing information and discrepancies before submitting the final version to HUD. The check will generate a list of errors and warnings where information is missing in the template. These omissions may indicate that a requirement has not been met, which could potentially cause the HUD Field Office to not accept the ConPlan and AAP submission as complete. For example, if any of the narrative fields on the Executive Summary screen are left blank or if all priority needs are not linked with goals in the Strategic Plan, the Quality Check will issue a warning. Goldsboro performs this Quality Check after the draft ConPlan and AAPs are completed before any releases for further participation as part of the Citizen Participation Plan (CPP). Goldsboro also performs the Quality Check before the final ConPlan and AAP is submitted to HUD. If any errors and warnings are indicated Goldsboro has always and will continue to address with the assistance and direction from Goldsboro designated HUD CPD Representative.

Comments that are directed to areas or subject matters that are not under the Community Relations Department as Lead agency of CDBG and HOME funds have been directed to the appropriate agency and/or department. Also, comments pertaining to personnel matters were not addressed as part of the citizen participation process. Goldsboro's Commission on Community Relations and Development responsibility within the current CPP is to:

- o Advise the Community Relations Department concerning community development and housing needs and proposed programs in Goldsboro as they become aware throughout the entire program year to meet those needs. As well as, provide the Community Relations Department with their feedback after reviewing Goldsboro's ConPlan, AAP, and CAPER submissions.
- o Provide Goldsboro residents with information concerning community development block grants, needs, and program proposals including participate in at least one public hearing/meeting facilitated by Community Relations Department staff per year. The purpose of the public hearing/meeting will

be to solicit citizen input – for example the May 22, 2020 Virtual Public Meeting held before the Commission on Community Relations and Development to obtain citizens input in regards to housing and non-housing needs as part of Goldsboro’s ConPlan and AAP.

- To otherwise assist the Community Relations Department with encouraging involvement and participation from the citizens of Goldsboro, not write or fully develop the ConPlan and AAP as a consultant would do under a contract for professional service.

All comments were forwarded to the Commission on Community Relations and Development on July 6, 2020 and were addressed during the Commission’s Regular Meeting on July 9, 2020 along with Goldsboro’s drafted response. The Commission did not provide additional comments to Goldsboro’s drafted response. However, the Commission did express gratitude for the citizen participation received. The Commission also voted to recommend the drafted FY20-24 ConPlan and FY20-21 AAP with administrative changes to include comments received with Goldsboro’s response and no substantial amendments to the Goldsboro City Council for a final approval and submission to HUD. All comments along with Goldsboro’s drafted response was provided to the Goldsboro City Council on July 7, 2020. The Community Relations Director has revised Goldsboro’s response to include: the Commission receipt and review of comments received along with their recommendation, the submission of comments to the City Council and other parties, and grammar corrections.

In summary, Goldsboro’s ConPlan and AAP describes how each task in the grants management cycle relates to one another and is part of a larger, cohesive process. Likewise, the sections of the ConPlan and AAP fit together into one unified narrative:

- The Needs Assessment and Market Analysis provide an overall picture of the different levels of need in Goldsboro and the market in which the funded programs will be carried out.
- The rationale for setting priorities in the Strategic Plan flow logically from the Needs Assessment and Market Analysis.
- The goals in the ConPlan and the AAP clearly describe Goldsboro’s plans to use the resources available to address the priority needs to benefit those greatly disproportionate within designated Household Area Median Family Income (HAMFI) and Area Median Income (AMI).

The projects in the AAP are designed to address the goals and priority needs outlined in the ConPlan. Goldsboro sees the ConPlan and preceding AAPs as roadmaps that will lead to Goldsboro, citizens, and stakeholders’ ability to explore additional forthcoming efforts and policies. To increase providing decent housing and a suitable living environment and expanding economic opportunities, principally for low- and moderate-income persons. Goldsboro also sees the priorities, goals, and projects within the ConPlan and AAP as comparable, if not complementary, to some of the suggested alternatives received. Goldsboro would like to thank a wide range of providers, citizens, advocacy groups, public and private agencies and community leaders for their input and contribution to the development and future implementation of Goldsboro’s ConPlan and preceding AAPs.

Respectfully submitted,



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