

HOME-ARP

Allocation Plan

March 2023

Participating Jurisdiction:

Asheville Regional
Housing Consortium

- City of Asheville
- Buncombe County
- Henderson County
- Madison County
- Transylvania County
- City of Brevard
- City of Hendersonville
- Town of Black Mountain
- Town of Fletcher
- Town of Marshall
- Town of Mars Hill
- Town of Montreat
- Town of Woodfin

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Table of Contents

Introduction	2
Consultation	3
Public Participation.....	15
Needs Assessment and Gaps Analysis.....	25
Homeless Needs Inventory and Gap Analysis Table.....	26
Housing Needs Inventory and Gap Analysis Table.....	26
HOME-ARP Activities.....	34
HOME-ARP Production Housing Goals	37
Preferences.....	37
Referral Methods.....	38
Limitations in a HOME-ARP Rental Housing or NCS Project.....	38
HOME-ARP Refinancing Guidelines	40
Appendix A	1
Appendix B	4
Appendix C	11
Appendix D	18
Appendix E	23
Appendix F.....	26
Appendix G	27

Introduction

As a part of the American Rescue Plan Act of 2021 (“ARP”), the Department of Housing and Urban Development (“HUD”) allocated \$4.925 billion in supplemental ARP funds through the HOME Investment Partnerships Program (“HOME”) to support communities throughout the country to address homelessness. This newly created funding source is called the HOME-ARP program. Eligible recipients included the 651 states and local participating jurisdictions (“PJs”) that qualified for an annual HOME Program Allocation in FY 2021.

The Asheville Regional Housing Consortium (“the Consortium”) was awarded \$4,699,862 in HOME-ARP funds to assist the following populations:

- Homeless
- At-risk of homelessness
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking
- Other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those at greater risk of homelessness
- Veterans and families that include a veteran that meets one of the preceding criteria

HOME-ARP funds can be used towards funding the following eligible activities to reduce homelessness and increase housing stability across the country:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling
- Purchase and Development of Non-Congregate Shelter

All PJs eligible to receive HOME-ARP funding are required to submit a HOME-ARP Allocation Plan to HUD for review. The HOME-ARP Allocation Plan provides a description of how the PJ intends to utilize its funding on proposed activities, and how it will address the needs of qualifying populations. In accordance with [Section V](#) of the Final HOME-ARP Implementation Notice, PJs must:

- Consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems
- Provide for and encourage citizen participation in the development of the HOME-ARP Allocation Plan

To complete a HOME-ARP Allocation Plan, a PJ must also:

- Conduct a needs assessment and gap analysis

- Describe proposed HOME-ARP activities
- Describe the PJ's production housing goals
- Identify whether the PJ intends to give preferences to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project
- Identify if the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, and state its HOME-ARP refinancing guidelines (if applicable)
- Implement a public comment period of at least 15 calendar days
- Hold at least one public hearing during the development of the HOME-ARP Allocation Plan and before submission

At the culmination of the Consortium-led consultation and public participation processes, along with the completion of its needs assessment and gap analysis, the Consortium has prepared the following HOME-ARP Allocation Plan for review, consideration, and acceptance by HUD.

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summary of the consultation process:

Through a competitive solicitation process, the City of Asheville ("the City"), the Consortium's lead agency, awarded Baker Tilly US, LLP ("Baker Tilly") a contract to complete HOME-ARP Allocation Plan consulting services on behalf of the Consortium. The project scope included:

- Developing and facilitating a community engagement strategy across a broad range of community stakeholders, advocacy groups, residents, and municipal and county staff
- Completing a needs assessment and gap analysis
- Conducting community engagement and consultation among agencies, service providers, and the public
- Facilitating a public hearing among residents of the community
- Assessing housing needs and priorities given current market conditions and projected growth trends for qualifying populations
- Prioritizing identified needs for qualifying populations
- Identifying and describing proposed eligible HOME-ARP activities to be completed by the Consortium
- Preparing the Consortium's HOME-ARP Allocation Plan

Prior to beginning the consultation process, Baker Tilly facilitated meetings with the City to review the goals and objectives of conducting community and stakeholder outreach and engagement. During these meetings, it was determined that the Consortium in addition to local public housing authorities (PHAs), community-based organizations (i.e. providers of various supportive services, veteran-based groups, domestic violence service providers, public/private agencies that address qualifying populations, etc.) would be consulted with to facilitate conversations focusing on unmet needs, gaps in affordable housing options and service delivery systems for the Consortium's most vulnerable citizens. Additionally, the City and Baker Tilly identified engagement methods that would be used to engage agencies and residents, which included: four virtual focus groups with agencies, one public hearing for residents, the distribution of an agency-focused Stakeholder Needs Assessment Survey, and the distribution of a Citizen Participation Survey in English and Spanish geared towards Consortium residents.

To prepare for the execution of the stakeholder focus groups, agencies were invited to register via Microsoft Forms to attend any of the four virtual focus groups being offered to provide their input. Focus groups were scheduled across a one-week timeframe for the following dates and times:

- Focus Group 1: Wednesday, January 18, 2023, 11:00 A.M. EDT – 12:30 P.M. EDT
- Focus Group 2: Thursday, January 19, 2023, 1:30 P.M. EDT – 3:00 P.M. EDT
- Focus Group 3: Friday, January 20, 2023, 11:00 A.M. EDT – 12:30 P.M. EDT
- Focus Group 4: Friday, January 20, 2023, 1:30 P.M. EDT – 3:00 P.M. EDT

A total of 51 agencies were invited to participate in the virtual focus group sessions; 42 individuals representing 30 agencies participated in at least one focus group or phone call discussion. During the focus groups and phone calls, a variety of questions were asked to address the following topics:

- Populations most in need of assistance
- More comprehensive understanding of qualifying populations
- Barriers to finding affordable housing and accessing supportive services
- Access to public transportation
- Coordinated entry process
- Greatest unmet needs and gaps in services among qualifying populations
- Potential project ideas that may be eligible under the HOME-ARP program

Participants were provided the opportunity to respond to open-ended questions throughout each session, which led to increased dialogue among the groups. Upon completion of the final focus group, agencies were also invited to complete an online Stakeholder Needs Assessment Survey, created in Microsoft Forms, which would allow agencies an additional opportunity to provide feedback, including those agencies that were unable to participate in a focus group. For additional outreach, the City shared the Stakeholder Needs Assessment Survey with the CoC for distribution among their member agencies.

Summary of comments and recommendations received through the consultation process:

Responses from the stakeholder agencies identified the development and preservation of affordable rental housing as the greatest priority in the Asheville Region for HOME-ARP funding. Focus group attendees mentioned a need for units of all sizes, including 1,2-,3-, and 4-bedroom units. The need for an increase in wrap-around supportive services, especially for mental health and substance abuse, was also frequently discussed. A need for non-congregate shelter was mentioned, specifically for areas and people that did not have proximal access to it.

According to discussion with stakeholders, housing rental rates have increased over the past few years, sometimes increasing in amounts of \$100/room, and the availability of housing and landlords accepting Tenant Based Rental Assistance (TBRA) vouchers has decreased to extremely low levels. Population growth, an increase in housing costs, and low vacancy rates have exacerbated the need for affordable housing. This has especially affected populations that live on a fixed income and those that cannot increase their income. Housing has also been hard to find for those with previous or current substance abuse disorders and mental health diagnoses. The stakeholders identified a demand for non-congregate shelter, for populations including persons with mental health diagnoses, those experiencing substance abuse and homeless youth. Younger residents also have barriers to rental housing due to an absence of rental background or credit and concern from landlords that properties won't be taken care of, however these barriers are often found across demographics. Thus, diverse types of affordable housing units are needed across the region, not just in one area, and it is important that public transit serves the areas with affordable housing. Wraparound supportive services, especially for mental health and substance abuse, were discussed.

Organizations consulted and summary of feedback:

Organizations consulted and summary of feedback			
Organization Consulted	Type of Organization	Method of Consultation	Feedback
The Salvation Army Hot Springs	Homeless Service Provider/Veteran Service Provider/Senior Service Provider/Youth Service Provider/People with Disabilities Service Provider	Virtual Meeting	Salvation Army does not have the funding to help with any homeless needs, but has a high number of people inquiring (calling daily), about sheltering, rental assistance, etc. They mostly hear about financial needs and help with mortgage and rent to keep from becoming homeless. There is no fixed route bus service in Madison County which causes problems with getting to work, grocery store, etc. Gas vouchers could be helpful for those with vehicles but cannot afford fuel and other operating costs. Vehicles that some people have need lots of mechanic work are not reliable. The greatest need the Salvation Army sees is families with children. There has been a spike in calls/needs from elderly people who are having a harder time affording groceries, making rents, etc. because of fixed incomes. Lack of housing is a huge problem- there is a long waiting list for affordable housing and landlords do not want to rent to people they don't know if they can count on to pay rent, etc.
Only Hope WNC, Inc	Homeless Service Provider/Youth Service Provider	Virtual Meeting/Email Correspondence	Age is a major barrier to housing; for first-time renters 20-years old and under because they have no history of renting. Incentives for landlords to rent to people without rental history would be helpful. Funding to get younger people into affordable housing and rent affordability are important topics. Landlords want first and last month of rent, which can be difficult. Funding should also be used to create youth housing and family housing units.

Thrive 4 Health	Homeless Service Provider/People with Disabilities Service Provider	Virtual Meeting	Biggest problem in the area has been the inability to find units. Rehabilitating and building new units are the most important activity for the region; permanent supportive housing is the highest need. Varying unit sizes are needed, including 1-, 2-, 3-, & 4-bedroom. There are more homeless singles looking for housing than families and there are over 400 people on a waitlist for affordable housing. One barrier to housing is pets, whether emotional support animal or not. Landlords are immediately denying people with a previous eviction. Funding is needed for rental housing, buildings, and for mobile home parks that go up for sale so that these can be purchased and rehabilitated.
Safelight	Domestic Violence Service Provider	Virtual Meeting	Safelight served 162 people in its shelter last year but has no need for additional beds; the organization has an emergency shelter with 16 beds that have never been used. Safelight works hard to get people out of emergency shelter and into transitional housing, which supports the need for housing developments and projects that are spread across the community. Public transportation isn't adequately serving neighborhoods or areas with affordable housing, which is a major concern. Funding is needed for non-profits to complete ADA conversions to help elderly people age-in-place. If the funding is used to leverage developers, extended-year minimums requiring that the housing remain affordable and accept vouchers should be put in place.
Henderson County Planning	County Government	Virtual Meeting	The region has a large elderly population on fixed incomes; increased pricing and cost of living is proving to be difficult for them. There is a high need for more affordable housing and diversity in housing- duplexes, townhomes, condos; dedicated workforce housing, etc.

City of Hendersonville	Municipal Government	Virtual Meeting	Highest need is to get roofs over heads through the development and preservation of affordable housing and non-congregate shelter. There is a big supply and demand issue driving up prices on housing and land. The cost of property and land does not allow people to buy property and generate low-to-moderate income housing. Developers are focusing on market rate and high-end properties. There currently are not any publicly owned properties designated for affordable housing. Funding should be provided to non-profit partnerships for the development of generational-type development and programs.
Aura Home Women Vets	Veteran Services/ Homeless Service Provider	Virtual Meeting	Aura Home Women Vets is transitioning to non-congregate shelter but needs funding to complete their remodel. The housing at Aura Home is for women veterans, their families, and their pets. The organization serves 36 women veterans plus their families making the total currently served 87. Additional funding for non-congregate shelter is desperately needed.
Transylvania County	County Government	Virtual Meeting	Transylvania County continues to see the largest housing concerns in rent affordability and limited availability, but our building department has seen single-family residential construction continue to increase in volume. We've seen ongoing growth in the short-term rental market in an area where at least a quarter of the homes are already secondary residences. The median prices of homes that have sold in Transylvania County are close to that of Buncombe County. There is a high need for additional affordable units as well as additional workforce units.
Habitat for Humanity-Transylvania County	Homeless Service Provider	Virtual Meeting	Habitat for Humanity cannot find any land to build on because it's too expensive. For example, a 0.3-acre lot is \$180K, which isn't feasible to build single-unit affordable housing on.

Sharing House	Homeless Service Provider/Youth Service Provider/Senior Service Provider	Virtual Meeting	Over the past few years, there has been a 45% increase in people seeking rental assistance. The Sharing House works to keep people in their homes and prevent housing loss by offering mortgage and utility assistance. The biggest landlord in the county raised rent by \$100/room, causing extreme hardship and loss of housing for some. More people are coming in for food assistance and water bill assistance. Sharing House would like to see more long-term affordable housing built, either with the housing authority or a local non-profit.
The Haven of Transylvania County	Homeless Service Provider/Senior Service Provider/Child and Youth Service Provider	Virtual Meeting	The Haven has a capacity of 18 people for emergency shelter. People are not leaving the housing authority accommodations and are staying there longer instead of moving out to more independent options. There is a lack of units outside at the housing agency and it cannot be found elsewhere. Because there is no turnover, this is keeping people that are not sheltered or in transitional housing out of low-income housing.
City of Brevard	Municipal Government	Virtual Meeting	Most people think of Transylvania County as rural with a lot of land, but half of the land is federal- or state-owned, making the urbanized areas more centralized instead of suburbanized. Construction costs are much higher in Transylvania County than Henderson causing home prices to be higher. The County does not have enough housing available to meet needs and it is difficult to find land with a price point that can work for affordable housing.
Housing Assistance Corporation	Homeless Service Provider/Housing Provider	Virtual Meeting/Email Correspondence	Transylvania County has historically received less allowance from HUD on a per-unit basis than adjacent counties. Funds should be used for the preservation of affordable housing because of the state of the available affordable housing in the region.

Pisgah Legal	Civil Rights/Fair Housing	Virtual Meeting	Federal dollars are not increasing with the cost of living, which is causing problems with affordability. Transylvania County has higher home prices and higher water costs than adjacent counties, but its federal funding allocation is lower. Transylvania County could benefit from more supportive services, including mental health support and housing support. There are not any non-congregate shelters in Transylvania County, so that is needed with wraparound services.
Homeward Bound of WNC	Homeless Service Provider/Veteran Service Provider	Virtual Meeting	There has been an increase in people experiencing substance abuse in the region and many landlords will not take people with a history of substance abuse. There is a much younger population experiencing homelessness with more severe mental illness than they have seen before. Because the cycle of homelessness typically stems from substance abuse or a mental health issue, mental and behavioral health wraparound services are critically needed. Availability for rapid rehousing is missing; it is very difficult to find housing and additional funding is needed for this. Shelter beds are available, but not for folks who are looking for high access or low barrier options. (Low barrier options serve people who cannot keep up with an ID; people that have a pet; people with PTSD or other mental health diagnoses; safe places for people in the LGBTQ community; places where families can be sheltered together; and generally, where people feel safe and comfortable.) There is a need to get people inside while waiting for a long-term housing opportunity.

Asheville Housing Authority	Housing Authority	Virtual Meeting	Stakeholders were unsure that these funds are the right funding opportunity for mental health services because of its one-time, limited availability. The funding should be used to make a capital investment that would make a long-term difference in the community. There is a need to expand shelter beds where people of all walks of life are welcomed and then guided into a permanent housing situation. Funding should be used for the purchase and development of non-congregate shelter or the production or preservation of affordable housing.
WNC Bridge Foundation	Homeless Service Provider/Health Service Provider	Virtual Meeting	There has been a spike in youth homelessness in ages 16-27, with more growth in the 16-21 age group. Mental healthcare is need in wraparound services, especially for those experiencing substance abuse. Special populations, including people with children that have long-term illness and people with disabilities, are a population that should be focused on that need specialized assistance.
Pisgah Legal	Fair Housing Service Provider/Civil Rights Service Provider/DV Service Provider/Veteran Service Provider/Persons with Disabilities Service Provider/Senior Service Provider	Virtual Meeting	There is an overall lack of housing stock and so much of the housing is going to people who move in from out of town. It seems that people are remaining homeless longer because of the lack of housing across the board. Most clients that Pisgah Legal works with are individuals with mental health issues; their clients are communicating that healthcare providers are saying they cannot help a person because "they are too far gone." Some people do not meet the Medicaid requirement for healthcare and are in the "healthcare gap."

Sunrise	Health Service Provider/Homeless Service Provider	Virtual Meeting	Over the last 2-3 months, the organization has seen more people with kids and families that are homeless or on the verge of being homeless. The area needs more places that offer mental health services that are accessible to low-income people. Substance abuse numbers are growing every year. There is a need for emergency shelter just to get a roof over people's heads. An emergency shelter location where there are fewer barriers for them to have a safe place to stay is needed; people with families have great difficulty finding places to stay together.
VAYA Health	Health Service Provider/Persons with Disabilities Service Provider	Virtual Meeting/Phone Call	Understands that more mental health services are needed for people experiencing mental illness or substance abuse, especially for those that aren't on Medicaid or Medicare. The whole region has a lack of housing, especially affordable and low barrier, which is one of the greatest needs.
Buncombe County Planning & Development	County Government	Virtual Meeting	Buncombe County collaborates with a variety of local organizations to provide essential services and housing resources for people experiencing homelessness. Those experienced partners have consistently identified affordable housing as the greatest regional need and the linchpin of an effective strategy to address homelessness. Buncombe County supports investing the majority of HOME-ARP funds in the development of affordable rental units.
Community Housing Coalition of Madison County	Senior Service Provider/Persons with Disabilities Service Provider	Phone Call	There is an "invisible" homeless population in Madison County. Because there are no resources or shelter, people leave the county and go to Asheville for assistance/shelter. Largest need is affordable housing. There are very few rental units, extremely low or 0% vacancy rates a majority of the time, and most locals cannot afford what is available. Landlords are turning rentals into Airbnb units.

Madison County Housing Authority	Housing Authority	Phone Call	Greatest need is affordable 1-bedroom housing for individuals and couples. Because there are no 1-bedroom units available, people with vouchers are renting 2- & 3-bedroom places (at 1-bedroom voucher rates), which means there is no availability for families who need more bedrooms. Out of approximately 180 households, approximately 100 are housed in 2- or 3-br units but have 1-br vouchers (and only need 1-br units). There is also a need for efficiency or 1-br units for people that are elderly and/or disabled. There are a lot of empty houses without tenants that do not meet building code requirements. If there was funding for rehabs to bring those units “up to code” and landlords willing to rent them, it could provide additional housing.
Haywood Pathways Center	Homeless Service Provider / Continuum of Care representative for Region 1 (Madison)	Phone Call	There are very few resources in Madison County and no shelter available, so people have to go to another county to access resources.
Blue Ridge Health	Health Service Provider	Phone Call	There is a lack of affordable or available housing across the region. Even if people have TBRA, there is no housing available. There needs to be more community engagement and buy-in order to improve the housing situation.
City of Asheville	Asheville / Buncombe Continuum of Care Lead Entity	Virtual Meeting	People experiencing homelessness often can’t access affordable housing unless units are specifically dedicated to them, so while we need more affordable housing in general, we need to be sure this federal resource that’s focused on homelessness is targeted to projects serving people experiencing literal homelessness. We currently have underutilized rental assistance so new housing units that are actually accessible to people exiting homelessness would fill a critical gap. Our CoC has system gaps and corresponding recommendations from the National Alliance to End Homelessness related to all 4 eligible uses of

			HOME-ARP, so regardless of where funding falls in the final allocation plan, collaboration with our CoC Board will be essential in making best use of these funds to fill those system gaps.
NC Coalition to End Homelessness	Balance of State Continuum of Care (Madison, Transylvania, Henderson)	Virtual Meeting	<p>Transylvania and Henderson Counties have both experienced high growth rates like the rest of the region causing a housing shortage. Madison County hasn't experienced the same population growth but still has major difficulties with finding available housing and affordable housing.</p> <p>Madison County has challenges with invisible homelessness; much of the homeless population there goes to Asheville because there are no services for the homeless population in Madison County. Some shelters do not have all of their available beds open, which is something that needs to change; there is plenty of shelter space. Organizations should work with landlords and encourage them take TBRA and some funding should be directed toward TBRA- however, this must be a combined effort. Behavioral Health and rehabilitation services are badly needed.</p>
WNC Source Community Development	Public Housing (Henderson and Transylvania)	Phone Call	<p>A high number of vouchers issued in both counties end up expiring due to lack of available/affordable housing. Efficiency & 1-bedroom units are the most difficult to find.</p> <p>Compared to Buncombe, Henderson & Transylvania have more households in need of 2- & 3-bedroom vouchers and units. It's even more challenging to find housing in Transylvania, due to the voucher rates being so much lower than actual rent rates. The greatest need in both counties is affordable housing. There's also a big need for shelters and supportive services. There is currently in sufficient housing to utilize more TBRA funds.</p>

El Centro of Henderson County	Civil Rights Service Provider/Health Service Provider/Youth Service Provider	Phone Call	Primarily serves the Latinx community. There are many barriers for the immigrant community with obtaining housing, including language, credit and documentation requirements. Because of these barriers, there are few housing options available for this population. It's very difficult for some community members to navigate housing on their own, without support. In many instances, extended family members and friends double-up/live together. There's a big need for affordable and accessible/low-barrier housing, as well as supportive services within the community.
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Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP Allocation Plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP Allocation Plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP Allocation Plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive
- The range of activities the PJ may undertake

Summary of the public participation process:

The Consortium recognizes the importance of collecting input and feedback from citizens residing within the community when designing programming that will ultimately impact residents the most. As such, the Consortium conducted extensive outreach and engagement efforts to ensure broad public participation in the development and review of the HOME-ARP Allocation Plan.

To initiate its public participation process, a 15-question Citizen Participation Survey was created and designed to collect feedback from the perspective of residents within the community regarding key populations in need, unmet needs within the community, and to identify priority areas for new services and programs to reduce homelessness and increase the availability of affordable housing.

Public comment period and public hearing

The draft HOME-ARP Allocation Plan was made available for public comment Monday, March 6, 2023 – Monday, March 20, 2023. The City made the draft HOME-ARP Allocation Plan available to the public via the City’s website and distributed the document among the CoC and its respective member agencies.

The City’s public hearing to discuss the draft HOME-ARP Allocation Plan was held on Tuesday, March 14 from 5:00 P.M. EST – 9:00 P.M. EST. The public hearing was held in person in the Council Chamber located on the second floor of City Hall, 70 Court Plaza, Asheville, NC 28801.

To market the City’s public comment period and public hearing, the City published notices across the following platforms:

- City Website: <https://www.ashevillenc.gov/department/community-economic-development/community-development/public-notices/>
- Newspaper: <https://www.citizen-times.com/public-notices/notice/02/15/2023/city-of-asheville-home-arp-draft-2023-02-15-citizen-times-north-carolina-8fa14c>
- Newspaper: <https://lanoticia.com/la-noticia-impresa/la-noticia-asheville/la-noticia-asheville-edicion-689/>

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|--|----------------------|
| • Public comment period start & end date: | 3/6/2023 – 3/20/2023 |
| • Public hearing date: | 3/14/2023 |

Summary of efforts to broaden public participation:

The City began to execute its public participation efforts on Friday, January, 20th 2023 by launching its Citizen Participation Survey across multiple platforms. Surveys were made available for 12 days, produced in English and Spanish, and were available online and in-person as a hard copy at key locations throughout the community. Distribution of the surveys included:

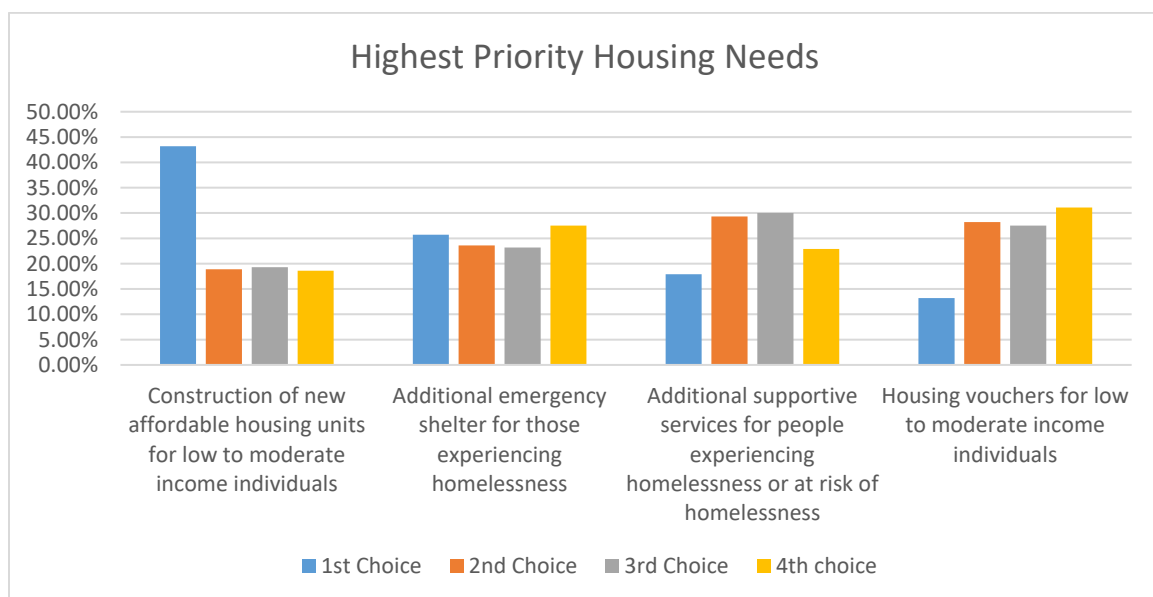
- Publishing on the City’s housing website (<https://www.ashevillenc.gov/projects/home-arp/>)
- Email distribution to CoC members, stakeholder organizations, and service providers
- Meetings with stakeholder organizations

The City’s Citizen Participation Survey received a total of 302 responses (284 – English, 18 – Spanish) from a broad section of the community.

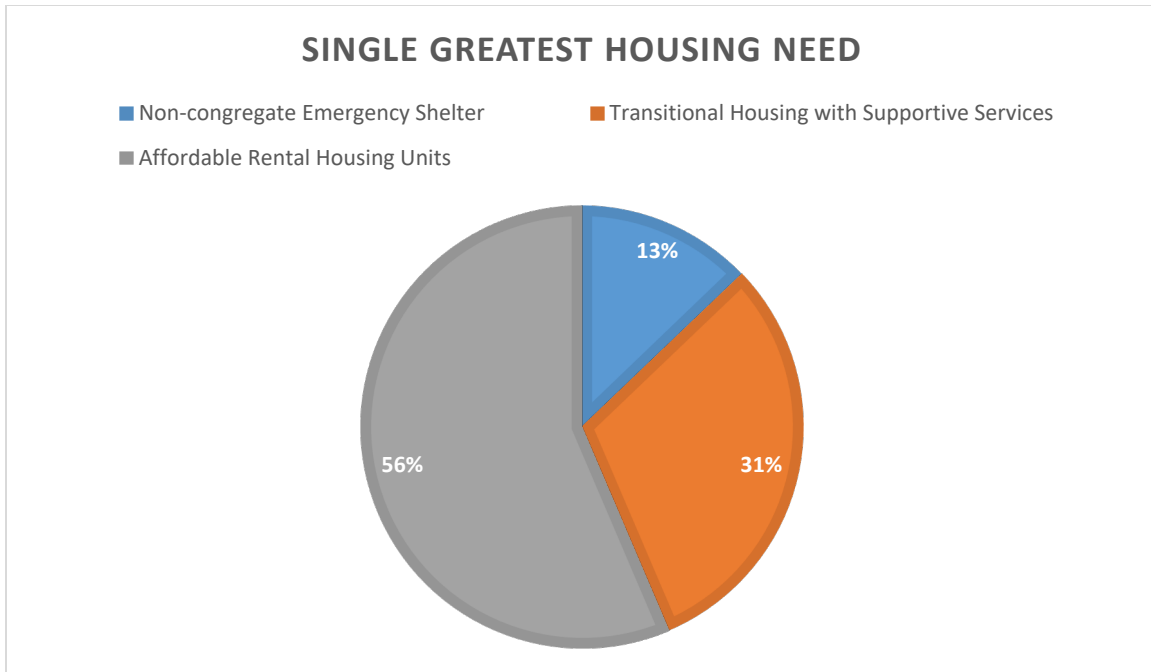
Summary of comments and recommendations received through public participation process:

The City of Asheville received feedback from 302 community residents during the public participation process. Comments and recommendations were received both from members of the public as well as stakeholder organizations and service providers. The detailed comments and recommendations from the 302 community residents are summarized below.

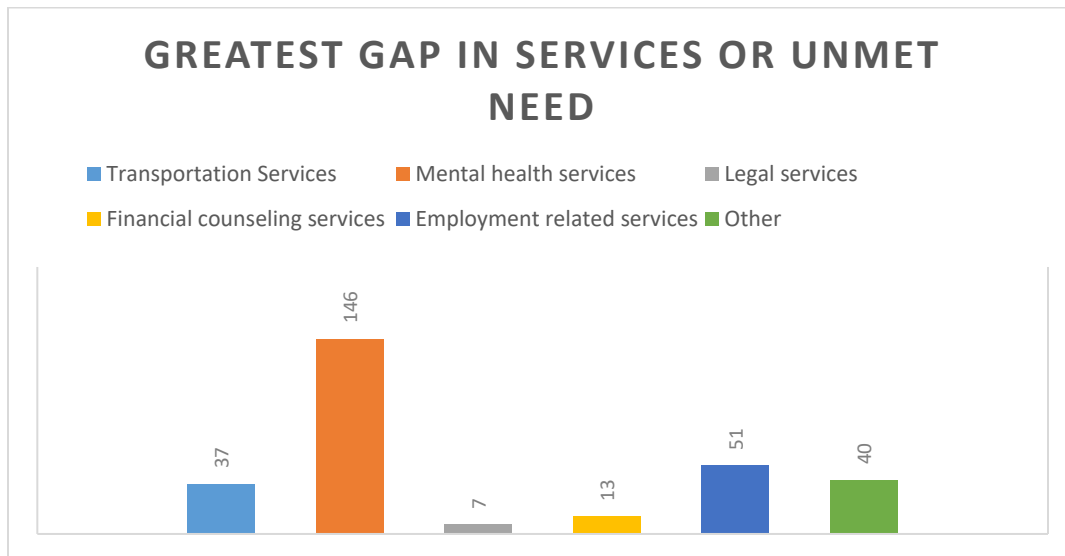
- **Citizen Comments and Recommendations**
 - Of the 302 individuals that responded to the Citizen Participation Survey:
 - 43.2% identified construction of new affordable housing units as their top priority
 - 25.7% of respondents identified additional emergency shelter as their top priority
 - 17.9% of respondents identified additional supportive services as their top priority
 - 13.2% of respondents identified housing vouchers for low to moderate income individuals as their top priority



- When asked what they thought was the single greatest housing need in the community:
 - 56% of respondents identified affordable rental housing
 - 31% of respondents identified transitional housing with support services
 - 13% of respondents identified non-congregate emergency shelter



- When asked about the greatest gap in services or unmet needs:
 - 146 respondents identified mental health services
 - 51 respondents identified employment related services
 - 40 respondents identified “other,” which included comments such as substance abuse management and recovery, all of the above, financial assistance with financial counseling, and education/workforce training



The data collected from the Citizen Participation Survey indicates that the feedback from the public is in support of **constructing new affordable rental housing units**. Additionally, there is a

need for some type of **permanent supportive housing** and the community shows strong support of **increasing mental health services**.

Additional long-form comments were received that covered a range of other topics related to wrap around services, substance abuse management and recovery, a combination of all services, life skills coaching, accessible homes, and childcare services.

Acceptance of public comments or recommendations

The City has reviewed and accepted all comments and recommendations that were submitted via the Citizen Participation Survey, received during the public comment and public hearing processes. All comments and recommendations received were considered as part of the HOME-ARP Allocation Plan development process.

The City received one written comment during the public comment period and one verbal comment during the public hearing.

The verbal comment received during the public hearing was primarily focused on housing vouchers and supportive services to connect individuals with resources, such as housing vouchers. Through the consultation process it was determined that the allocation plan should not include additional funding for tenant based rental assistance due to the difficulty in utilizing existing vouchers because of the lack of housing stock. The allocation plan attempts to alleviate these issues by providing funding for affordable rental housing which will create additional housing stock where vouchers can be utilized, and by providing funding for supportive services which can be used to help connect individuals and families with resources.

The written comment received during the public comment period was related to the need for additional shelter capacity, specifically for individuals fleeing or attempting to flee domestic violence. The need for additional shelter capacity was also identified during the consultation and public participation process, however, it was determined that affordable rental housing and supportive services was the highest and best use of the HOME-ARP funding based on previous plans and studies, surveys, data, and feedback received during the consultation process. The written comment received during the public comment period also noted a minor discrepancy with domestic violence shelter referral data provided by the State of North Carolina. The City obtained corrected data from the State of North Carolina and the draft plan was updated with the new data.

Asheville Region Demographic Profile

The Asheville Regional Housing Consortium covers a four-county region including Buncombe, Henderson, Transylvania, and Madison counties. The largest city within the region is Asheville.

Located at the confluence of the French Broad and Swannanoa Rivers in the Blue Ridge Mountains, Asheville has its origins in a land grant to Colonel Samuel Davidson. The city is named in honor of North Carolina Governor Samuel Ashe. Asheville was an outpost city serving primarily as a crossroads of Indian Trails on a plateau surrounded by mountains and rivers. Frontiersmen such as Daniel Boone and Davy Crockett traveled through the city in the early 1800s. When the railroad arrived in the area in 1880, it transformed Asheville and Buncombe County into a resort and therapeutic health center. The population climbed to 10,000 permanent residents in 1890.

In 1889, George Vanderbilt began work on his mansion, The Biltmore, which is the largest private residence ever built in the United States. The presence of the Biltmore attracted others to Asheville, resulting in the construction of elegant hotels. The biggest boom took place during the 1920's, when a number of residential subdivisions were developed. The city was hit hard by the Great Depression, when in 1930 the largest bank in Buncombe County went bankrupt. Because of this economic situation, the city did not experience the same redevelopment of its urban core that many other cities did in the 1960s and 1970s. The result was that Asheville's downtown core was not replaced with more modern buildings, helping to preserve its historic character. This is why Asheville remains a snapshot of what an American boomtown looked like during the turn of the century. During an exploration of the current city, a modern visitor will see restaurants, galleries and independent shops housed in elegant art deco buildings.

The region has grown rapidly in recent decades due to migration from other areas of the country. It has gained national attention as a center for tourism, hospitality, and outdoor recreation.

Total Population

The combined population for all four counties was 439,912 at the time of the 2020 Census, a 10.3% increase from the 2010 Census. This total population represented 244,795 households. The Asheville MSA, whose boundaries extend beyond the four-county region, had a population of 469,454 at the time of the 2020 Census.

2020 Census population by county

- Buncombe: 269,452
- Henderson: 116,281
- Transylvania: 32,986
- Madison: 21,193

Buncombe and Henderson counties have population densities of 410.4 and 311.8 people per square mile, respectively. Madison and Transylvania counties are significantly more rural and have population densities of 47.1 and 87.2 people per square mile, respectively.

Race & Ethnicity

The region's White population was 398,994, or 90.7% of the total population. The region's Hispanic population was 33,719, or 7.66% of the total population. The Black population was

22,099, or 5.02% of the total population. The region's Asian population was 5,911, or 1.3% of the total population. No other race made up more than 1% of the total population.

Gender & Age

According to the 2020 Census, 227,384 persons or 51.7% of the total population were female and 212,528 persons or 48.3% of the total population were male. According to the 2020 Census, of the 439,912 persons, 23.3% were 65 years and over, 17.8% were under 18 years, 4.4% were under 5 years, and 54.4% were between 18 to 64 years.

Educational Attainment

According to the 2020 ACS 5-Year Estimates, 120,179 persons over age 25 have a Bachelor's degree or higher. Thus 37.6% of the total 320,050 persons over age 25 are college graduates.

Workforce

According to a Lightcast Economic Overview for the Asheville MSA, which includes data from the Bureau of Economic Analysis (BEA), US Census Bureau, and Bureau of Labor Statistics (BLS), the top industries by total employment are Health Care and Social Assistance (32,582 jobs), Retail Trade (27,027 jobs), Government (26,563), Accommodation and Food Services (24,352 jobs), and Manufacturing (22,311 jobs). Of these industries, Accommodation and Food Services, Manufacturing, and Retail Trade had location quotients of 1.42, 1.34, and 1.29, respectively. These high location quotients indicate that these industries make up a greater share of regional employment when compared to the national average.

The Asheville MSA has an unemployment rate of 3.10% and a labor force participation rate of 58.58% as of November 2022. The 25-34 age group made up 26.74% of the unemployed population and the 35-44 age group made up 25.66% of the unemployed population as of November 2022. There were 232,856 persons in the Asheville MSA labor force as of November 2022.

According to the May 2021 BLS Occupational Employment and Wages Report, the average hourly wage in the Asheville MSA was \$22.82, 19% less than the national average of \$28.01 for the same period.

According to the US Census Bureau, the mean travel time to work in minutes for workers age 16 years and older was 20.4 for Buncombe, 21.9 for Henderson, 22.5 for Transylvania, and 33.1 for Madison.

Household Characteristics

According to ACS 2020 5-year estimates, the Asheville MSA had 190,156 households. There were a total of 116,599 families with an average family size of 2.95.

47.1% of households included one or more people 60 years and over. 23.7% of households included one or more people under the age of 18.

Units with individuals living alone accounted for 31.3% of total households.

Household Tenure Type

According to the US Census Bureau, as of July 1, 2021, there were a total of 219,323 housing units across the four-county region. Of these, 68.4% were owner-occupied units. Henderson, Madison, and Transylvania counties all had owner-occupied rates of over 74% while Buncombe had an owner-occupied rate of 64%.

Of the total 219,323 housing units across the four-county region, the 2020 ACS 5-Year Survey estimates that 36,974, or 16.9% of the total, are currently vacant or unoccupied. One factor contributing to this high vacancy rate is the 15,986 units that are unoccupied because they are designated for seasonal, recreational, or occasional use. This category represents 43.2% of total vacant or unoccupied units.

Household Income

The US Census Bureau estimates median household income in 2021 dollars as the following for the four-county region: Buncombe- \$59,699; Henderson- \$59,928; Transylvania- \$57,830; Madison \$51,396. Per capita income was estimated as: Buncombe- \$36,057; Henderson- \$33,905; Transylvania- \$32,718; Madison- \$29,070. Percent of persons in poverty was estimated as: Buncombe- 11.7%; Henderson- 12.0%; Transylvania- 12.5%; Madison- 15.3%.

The US Census Bureau calculates special tabulations for the Department of Housing and Urban Development (HUD) to determine the income level of a low-income household specifically for designated metropolitan statistical areas. A low-income household is one having an annual median income for the area at 80% of the median. What constitutes median income is further adjusted for households of varying sizes. The tabulations published by HUD for the Asheville, NC metropolitan statistical area year 2022 calculates median area income by household size. A low-income 1-person household would have an estimated annual median income of \$45,000. Adjusting for a household having 4-family members, a low-income household would have an estimated annual median income of \$64,250.

Households whose annual incomes are 30% and below the median area income are determined by HUD to be extremely low-income households. Being considered an extremely low-income household is one of the conditions for HUD's definition of at risk of homelessness. According to HUD calculations, an extremely low-income 1-person household in the Asheville, NC statistical area has income of \$16,900. Adjusting for households having 4-family members, an extremely low-income household has an annual median area income of \$24,100.

Housing Costs

Data from the Zillow Home Value Index has been utilized to present a picture of the region's housing market. The index reflects the typical value for homes in the 35th to 65th percentile range. Average home values for the Asheville MSA were \$391,807 as of January 2023. This is an increase of 60.6% from the value of \$243,927 in January 2018, and an increase of 139.1% from the value of \$163,839 in January 2006.

Additional detailed housing data is made available by the Harvard Joint Center for Housing Studies. According to this study released in April 2022, the typical home value for the Asheville MSA was \$400,114. The typical monthly mortgage payment was \$2,069 with total monthly owner costs totaling \$2,842. The annual income needed to afford the typical sale price for a house was \$110,022.

As of 2021, the Harvard Joint Center for Housing Studies calculated the ratio of the median home price for existing home sales to the median household income at 5.6. This represented an increase of 2.0 from 2000. This highlights the growing gap between housing costs and incomes in the region.

Affordable Housing

The Harvard Joint Center for Housing Studies calculated the typical mortgage payment in the Asheville MSA at \$2,069 with the annual income needed to purchase a home at \$110,022. The US Census Bureau estimates median household income in 2021 dollars as the following for the four-county region: Buncombe- \$59,699; Henderson- \$59,928; Transylvania- \$57,830; Madison \$51,396. Per capita income was estimated as: Buncombe- \$36,057; Henderson- \$33,905; Transylvania- \$32,718; Madison- \$29,070. All of which are significantly below the \$110,022 the Harvard Joint Center for Housing Studies estimated as necessary to afford a home.

To assist families and households earning annual incomes below the median to afford housing, each year the federal government allocates funds towards affordable housing production. Under the Cranston-Gonzalez National Affordable Housing Act, Congress has defined affordable housing as an initial purchase price or after-rehabilitation value of homeownership units that do not exceed 95 percent of the area median purchase price for single family housing, as determined by HUD. The fiscal year 2022 unadjusted affordable housing sales limit for existing homes for the four-county region are as follows:

- Buncombe County: \$314,000 for one-bedroom; \$602,000 for four-bedroom
- Henderson County: \$307,000 for one-bedroom; \$589,000 for four-bedroom
- Madison County: \$307,000 for one-bedroom; \$589,000 for four-bedroom
- Transylvania County: \$238,000 for one-bedroom; \$458,000 for four-bedroom

Affordable Rental Housing

According to ACS 2018 5-year estimate median gross rent for the four-county region was as follows: Buncombe- \$933/month; Henderson- \$823/month; Madison- \$678/month; Transylvania- \$720/month. For four-bedroom units these numbers increase as follows: Buncombe- \$1,509/month; Henderson- \$1,241/month; Madison- \$1,070/month; Transylvania- \$1,269/month.

The Department of Housing and Urban Development establishes affordable rents for units eligible to be assisted with federal housing funds. For the Asheville MSA, the fiscal year 2022 Fair Market Rent is \$1,188/month for an efficiency unit; \$1,209/month for a one-bedroom unit;

\$1,378/month for a two-bedroom unit; \$1,879/month for a three-bedroom unit; and \$2,359/month for a four-bedroom unit.

The National Low Income Housing Coalition (NLIHC) releases annually the report, [Out of Reach](#). This report provides rich data and calculations which enables a better understanding of how difficult it may be for lower income households to find affordable housing. Here is a summary of the findings for the Asheville HUD Metro Fair Market Rent Area released in 2022.

According to the NLIHC Out of Reach report, the annual income needed in the Asheville HUD FMR area to afford an efficiency unit at fair market rent was calculated at \$47,520. The annual income needed for a one-bedroom unit at fair market rent was calculated at \$48,360. To afford a two-bedroom unit at fair market rent, a calculated annual income of \$55,120 would be required. A three-bedroom unit at fair market rent would require a calculated annual income of \$75,160 and the annual income required to be able to afford a four-bedroom unit at fair market was calculated at \$94,360.

The hourly wage calculated as necessary to be able to afford an efficiency unit in the Asheville Fair Market Rent Area was calculated at \$22.85. The hourly wage necessary for a one-bedroom unit was calculated at \$23.25, while a two-bedroom unit required an hourly wage of \$26.50. Affording a three-bedroom unit required an hourly wage at \$36.13 and a four-bedroom unit required an hourly wage of \$45.37. These hourly wages of affordability were the highest in the state.

For a household earning the minimum wage of \$7.25, the number of hours a week necessary to work was calculated as 126 hours to afford an efficiency unit, 128 hours a week to be able to afford a one-bedroom unit, 146 hours a week to be able to afford a two-bedroom unit, 199 hours a week to have the income necessary to afford a three-bedroom unit, and 250 hours a week to be able to afford a 4-bedroom unit.

The NLIHC Out of Reach report concluded that with an average wage for renters equaling \$15.87 an hour, a person having a full-time job would be able to afford a rent of \$825 a month. A person working full-time, but at minimum wage, could only afford a rent of \$377 a month. And an extremely low-income household, that is a household with annual income no greater than 30% of the median, would be able to afford a monthly rent of \$600. And a very low-income household, that is a household with annual income no greater than 50% of the median, would be able to afford a monthly rent of \$1,000. To understand just how difficult it is for lower income households to afford housing, the Fair Market Rent for an efficiency unit in the Asheville Fair Market Area is \$1,188. Meaning, households at risk of homelessness and at greatest risk of housing instability cannot even afford an efficiency unit in the Asheville housing market. Even when occupying a job paying the mean renters wage, single persons still would not be able to afford the monthly Fair Market Rent of an efficiency unit.

Housing Stock

According to ACS 2020 5-year estimate, of 214,887 housing units in the four-county region, 142,010 are single-unit detached. This figure constituted 66% of all housing units.

Housing structures having 10-19 units were estimated at 5,994 or 3% of all units, while structures having 20 or more units were estimated at 8,623 or 4%. The more rural counties of Madison and Transylvania counties had significantly lower numbers of multi-unit structures than the more urbanized counties of Buncombe and Henderson.

Clearly the data show that single unit structures are the primary structure type in the four-county region. This data indicates that additional funds be allocated towards multi-unit structures to make rental units more affordable for lower income households.

In terms of unit size, it is estimated that 3,432 or 2% of units are 2-bedrooms. The estimated total of 3-bedroom units is 12,955 or 6% of the total. A total of 9,690 or 5% of units are 1-bedroom units. The data shows that only 13% of total units have 3-bedrooms or less, indicating a need for more units in these categories.

According to the ACS 2020 5-year estimate, 16,954 or 7.89% of units were constructed after 2010. 60,360 or 28% of units were constructed prior to 1979. 109,459 or 59% of units were constructed between 1980 and 2009.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including the Point in Time (PIT) count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

Homeless Needs Inventory and Gap Analysis Table

Homeless Needs													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	67	33	233	0	5								
Transitional Housing	59	21	218	0	174								
Permanent Supportive Housing	118	37	536	0	382								
Other Permanent Housing	156	53	247	12	131								
Sheltered Homeless						34	412	142	60				
Unsheltered Homeless						9	291	12	41				
Current Gap										60	15	285	0

Data Sources: 1.) Asheville Buncombe County CoC Continuum of Care Count, 2.) Balance of State CoC Count for Henderson, Madison, and Transylvania counties.

Gap Analysis for Family Beds. Consultation with Agencies.

Gap Analysis for Adult Beds. Consultation with Agencies.

Housing Needs Inventory and Gap Analysis Table

Housing Needs			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	63,786		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,528		
Rental Units Affordable to HH at 50% AMI (Other Populations)	11,545		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		9,463	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,028	
Current Gaps			6,115

Data Sources: 1. American Community Survey (ACS) 2017-2021 5-year estimate; 2. [Comprehensive Housing Affordability Strategy \(CHAS\) 2013-2017](#);

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

The 2022 Point In Time (PIT) count for the Asheville Buncombe County CoC and for Balance of State Counties of Henderson, Madison, and Transylvania have been specially tabulated for this analysis of the size and demographic composition of qualifying populations for the Asheville Regional Housing Consortium. The PIT count is conducted in January and may under report the true number of unsheltered homeless and those who are at risk of homelessness, therefore, additional data sources have been utilized, such as the [Within Reach](#) report developed by the National Alliance to End Homelessness.

During the Point In Time count there were 746 households that were experiencing homelessness. Of these households, 446 were sheltered and 300 were unsheltered. Of the 446 sheltered homeless, 34 were families and 412 were single-adults. Of the 300 unsheltered homeless, 9 were families and 291 were single adults.

These 746 homeless households represent 827 persons.

Of the 827 homeless persons identified as homeless during the PIT count, only 824 had gender data available, of those, 530 were males, 293 females, and four (4) identified as transgender. Of males, 167 within the Asheville Buncombe CoC were unsheltered while 63 females were unsheltered. A total of 2 persons identifying as transgender were also unsheltered.

Of households consisting of a single adult, 249 were chronically homeless. 211 of these households were located in the Asheville Buncombe CoC. Of the 211 chronically homeless within the Asheville Buncombe CoC, 112 were unsheltered.

The number of veterans who were homeless on the night of the Point In Time survey numbered 154, with 150 enumerated in Asheville Buncombe. Homeless persons with a severe mental illness accounted for 134 of the population, all within Asheville Buncombe. Another 100 homeless persons suffered chronic substance disorder, all within Asheville Buncombe. And of homeless persons, eight (8) were HIV positive.

Consistent with the population at large for Buncombe, Henderson, Madison, and Transylvania counties, the majority of homeless persons during the PIT count were White. For persons where racial identity was captured, the number of White persons who were homeless reached 618 persons or 75%. The number of homeless persons whom were Black totaled 151 persons. Thus, Black persons made up 18% of the total homeless. A total of 34 homeless persons identified as Multi-Race. Another 17 identified as American Indian/Alaskan Native. Only 3 homeless persons were Asian and only 1 homeless person was Native Hawaiian or Other Pacific Islander. Of homeless persons where information on ethnicity was captured, 48 were Hispanic/Latino.

The City of Asheville commissioned the National Alliance to End Homelessness to publish the [Within Reach](#) report on unsheltered homelessness for the Asheville-Buncombe Continuum of Care. This report found that between October 1, 2020–September 30, 2021, Black individuals represented disproportionately higher percentages of those returning to homelessness (31 percent). The report also found that Black individuals were disproportionately underrepresented among those accessing transitional housing (10 percent) and emergency shelter (19 percent). This disproportionality is in relation to Black persons making up only 6.3% of the total population but 23.7% of the population experiencing homelessness with the Asheville-Buncombe CoC when the report was released.

At Risk of Homelessness as defined in 24 CFR 91.5

Persons or families who are at risk of homelessness as defined in 24 CFR 91.5 are persons or families with incomes 30% and below the median area income who lack sufficient resources or support networks to prevent them from having to move into an emergency shelter. Such persons and families who are at risk of homelessness must also meet one of several conditions, such as living in a hotel/motel without receiving any housing assistance, living in overcrowded housing situations, received a recent notice they must move from their current housing, or who are living in the home of another due to some economic hardship.

It is difficult to estimate this population as other conditions may not be known until such persons or families seek out some form of housing assistance. However, data made available by HUD's CHAS database tabulated from ACS surveys from 2015 to 2019 indicated that the counties of Buncombe, Henderson, Madison, and Transylvania had 20,945 households with incomes at 30% and below HUD's area median income. And of these households, a total of 14,025 had a housing problem of either being overcrowded (i.e., there being more than 1.1 persons per room), cost burdened (i.e., paying more than 30% of their monthly income towards housing costs), incomplete plumbing and incomplete kitchen facilities.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The NC Council for Women and Youth Involvement (CFWYI) requires each state-funded domestic violence (DV) and sexual assault (SA) grantee to report semi-annually on client service provision. CFWYI compiles the statistical data for DV and SA services utilized by women, men, and children seeking support, information, counseling, and advocacy. CFWYI monitors the delivery of services and produces the only county-level data on these client services in North Carolina. <https://ncadmin.nc.gov/divisions/council-women-youth/statistics>

From July 2021 to June 2022 there were 5,312 domestic violence calls made in Buncombe, Henderson, Madison, and Transylvania Counties. These calls involved 6,095 persons needing services including householder and children. An overwhelming number of these incidents reported were within Buncombe County with 4,413 victims. A significant number of these

incidents also took place in Henderson County with a total number of 1,072 incidents reported. Where gender was reported 4,755 of these victims were Women and 880 were Men. A total of 99 of these incidents involved hospitalization and 654 resulted in shelter stays. Also of note, it was necessary to refer 481 clients to other facilities due to lack of availability, with 392 of these referrals being out of Buncombe County.

Cases of domestic violence involving sexual assault reached 1,306 during the time period. Where gender was reported 1,003 of these victims were Women and 144 were Men. Of these incidents 39 involved human trafficking. And 467 involved rape. A total of 45 persons were reported as requiring hospitalization from these tragic incidents.

During the Point In Time survey a total of 101 households were homeless because of domestic violence. A total of 60 of these households were sheltered and 41 were unsheltered.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Other populations requiring services include those who are currently housed due to temporary or emergency assistance. In the Asheville Metropolitan Area during the Point In Time survey, there were 759 families and persons receiving such assistance. A total of 554 households were being assisted with permanent supportive housing of which 523 were adult only households and 138 were receiving assistance thru the rapid re-housing program of which 119 were adult only households. Another 67 households were being assisted from other programs where no supportive services are necessary for clients to maintain their housing. A total of 6 households receiving non-supportive housing were family households.

Other households identified as being at greatest risk of housing instability are households with incomes at 30% and below median income who experience severe cost-burdened, meaning they pay more than 50% of their monthly income towards housing costs. Data made available by HUD's CHAS database tabulated from ACS surveys from 2015 to 2019 indicated that the counties of Buncombe, Henderson, Madison, and Transylvania had 10,115 households with incomes at 30% and below HUD's area median income who were severely cost burdened.

Households with incomes of 50% and below area median family income and who meet other conditions for those at risk of homelessness are also considered at greatest risk of housing instability. The CHAS data for 2015-2019 estimates that there were 22,775 households residing in Buncombe, Henderson, Madison, and Transylvania counties with incomes between 31% and 50% of median family income. Of these households, 11,810 are owners and 10,965 are renters. While there is no reliable data available to provide an estimate of how many of these households also have one of the conditions of at risk of homelessness, the CHAS data did estimate that 12,740 have a housing problem of either being overcrowded (i.e., there being more than 1.1 persons per room), being cost burdened (i.e., paying more than 30% of their monthly income towards housing costs), had incomplete plumbing and incomplete kitchen facilities.

Based upon these estimates, it would be reasonable to conclude that close to 23,650 households are at greatest risk of housing instability within the Asheville Metropolitan Area.

Data from local public housing authorities give an indication of the number of households at greatest risk of housing instability who are actively seeking to mitigate such risk. Within the Asheville Home Consortium, there are eight (8) public housing authorities. These housing authorities own 2,260 units of affordable housing. At the time of the writing of this HOME ARP Allocation plan, there were at least 1,957 households on the waiting list for these units. These housing authorities also issue vouchers enabling low-income families to secure housing in the rental market. These agencies currently have 3,609 vouchers issued. And there are at least 3,281 households on the waiting list for vouchers. It is significant to note the geographic distribution within the Consortium of the waiting list. Of 1,957 households on the waiting list for units owned by a housing authority, 1,561 of these units are located within Buncombe. And of 3,281 households on the waiting list for vouchers, 3,241 are also within Buncombe.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing

There are currently nine (9) Emergency Shelter providers within the Asheville Buncombe CoC. During the Point In Time survey 28 family beds and 176 adults-only beds were being utilized.

There are currently four (4) Transitional Shelter providers within the Asheville Buncombe CoC. State. During the Point In Time survey 54 family beds and 213 adults-only beds were being utilized.

Homeward Bound and The Housing Authority for the City of Asheville provide Permanent Supportive Housing services. During the Point In Time survey 99 family beds and 523 adults-only beds were being utilized.

Four (4) organizations currently provide rapid re-housing services. During the Point In Time survey 49 family beds and 119 adults-only beds were being utilized.

Three (3) organizations within the Asheville Buncombe CoC provide Permanent Housing where clients do not need extensive supportive services. During the Point In Time survey, 12 family beds were being funded from this type of permanent housing assistance and 61 adult-only beds were being funded.

In the counties representing the Balance of State CoC within the Asheville Consortium, Madison had one housing service provider offering beds for victims of domestic violence. A total of 14 beds were provided in four (4) family units and 3-beds were available to adults.

In Henderson County, there were two (2) housing service providers offering a total of eight (8) emergency shelter beds within three (3) family units and 41 beds allocated to adults. There was also one (1) service provider in Henderson that provided one (1) transitional housing bed to one (1) adult.

In Transylvania County, there were also two (2) housing service providers offering a total of 21 emergency shelter beds within six (6) family units. Another 13 beds were made available to adults. There was also one organization in Transylvania County offering housing services to victims of domestic violence. This service provider offered five (5) transitional beds within two (2) transitional housing units and four (4) transitional beds were made available to adults.

Detailed data on permanent supportive housing providers and rapid re-housing providers within the Balance of State CoC counties did not allow for determination of the place of residence at time of initial service. However, within Region One which includes Madison County, there were 40 family beds being supported with rapid re-housing funds. Another 48 were adults being supported with rapid re-housing. A total of 21 veteran households were also supported through the rapid re-housing program within Region One.

In Region Two including Henderson and Transylvania counties, 19 beds were supported through permanent supportive housing for families and 13 for adults. Another 55 beds for families were supported through rapid re-housing and 19 for adults.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Homeless as defined in 24 CFR 91.5***
- ***At Risk of Homelessness as defined in 24 CFR 91.5***
- ***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***
- ***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice***

The most significant unmet housing need for homeless persons is access to affordable housing units and supportive services including case management and mental health and substance abuse services to connect these individuals to housing. The Housing Needs Inventory and Gap Analysis Table presented above showed with estimates provided by HUD, that 16,491 households with incomes at and below 50% of median income also experienced one or more severe housing problems.

Rapidly rising rental prices and limited availability of affordable housing stock is impacting persons with incomes at 30% and below median income as well as those persons whose incomes are at 50% of the median but who also meet one of the definitions of at risk of homelessness. A common situation identified during the consultation process is circumstances where a landlord increases rents by \$300 or more per month near the end of a current lease. This situation, combined with the limited housing availability, can force people out of a stable housing situation and into homelessness. Also identified during the consultation process was the fact that existing housing vouchers are harder to utilize due to the limited affordable housing stock.

The data from made available from the Point In Time survey showed a need for adult only beds for homeless persons. Data available on domestic violence also showed a need for additional units as 481 referrals were made during the year.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Through consultation with community stakeholders and supporting data previously collected by Asheville as lead agency of the Consortium, it was noted that there is a reduced number of affordable rental housing units available due to recent housing trends that have removed affordable units from the market. As such, this results in a reduced number of affordable rental units available within the region's housing inventory. It was also noted that the largest gap in housing affordability is among rental households, specifically among extremely low- and low-income households. Additionally, because of the lack of available units, individuals are having difficulty utilizing existing voucher programs. In the Citizen Participation Survey, 43% identified construction of new affordable rental housing units as the top priority for the use of HOME-ARP funds, and 56% identified affordable rental housing as the most needed housing solution. In direct response to this identified gap, the region has elected to allocate \$3,100,000 towards the **Production of Affordable Rental Housing** in an effort to increase housing affordability and availability.

The Point In Time count did indicate a gap in shelter beds for single adults. And data from the Council for Women & Youth Involvement did show a gap in units for victims of domestic violence and stalking resulted in 481 referrals made during the year.

The consultation process also identified a significant need for additional supportive services for outreach, case management, and mental health and substance abuse. In response to this identified gap, the region has also elected to allocate \$1,000,000 towards **Supportive Services**. Regarding gaps within the service delivery system, in the Citizen Participation Survey, mental health services was identified as the most needed service for individuals at risk of or currently experiencing homelessness. 146 respondents identified mental health services, 51 identified employment related services, 37 identified transportation services, 13 identified financial counseling services, 7 identified legal services, and 40 selected "other." It was noted in comments that many of the respondents that selected "other" were identifying substance abuse services.

The City of Asheville also recently released the [Within Reach](#) report from the National Alliance to End Homelessness. Strategy #5 of the report was: Invest In the Future: Increase the Production of/Access to Permanent Housing Solutions. One of five priorities associated with this Strategy that funds made available under this ARP-Allocation Plan may support will be: Develop pipeline plan for new supportive housing units over the next ten years. The production of affordable rental housing units facilitates the leveraging of funding to provide other supportive services such as mental health services, substance use disorder services, and

employment related services. Funds to be made available under this ARP-Allocation plan will result in additional affordable units added to the inventory and supportive services.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

The City has elected not to include additional characteristics associated with instability and increased risk of homelessness in the HOME-ARP allocation plan.

Identify priority needs for qualifying populations:

The data available during the development of the allocation plan and feedback from Citizen Participation Survey’s and consultation with homeless service providers all indicated the lack of affordable rental housing to be a top priority. Given the lack of available units and the difficulty with utilizing existing housing vouchers, it was determined that the **Development of Affordable Rental Housing** would serve the greatest number of persons and families.

Homeless service providers also identified that many who experience chronic homelessness suffer from some form of severe mental health illness or substance abuse issues. Therefore, it was also determined that **Supportive Services** is a high priority need to assist qualifying populations.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The level of need and gaps in the shelter, housing inventory, and service delivery systems were determined by the following primary sources:

- 2022 Asheville Buncombe CoC Point In Time Survey
- 2022 Balance of State CoC Point In Time Survey for Henderson, Madison, and Transylvania counties
- Housing Needs Update Buncombe County, North Carolina 2019
- Within Reach: Ending Unsheltered Homelessness In The Asheville Buncombe CoC,
- 2017-2021 5-year estimate American Community Survey,
- 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data,
- 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data,
- Consultations with Asheville, Buncombe, Henderson, Madison, and Transylvania County area homeless need providers,
- Stakeholder Needs Assessment Survey, and
- Citizen Participation Survey.

For the 4-county region, the Point In Time surveys of homeless persons did show the number of unsheltered persons being 291. The total number of shelter beds available for single adults during the Point In Time count was 451 with the number of sheltered persons reaching 412. These figures indicate a need for additional adult beds to be added to the inventory.

The number of shelter beds available to families during the Point In Time survey was 126 beds in 54 units. However, only 34 units were occupied by families during the Point In Time count.

The greatest gap identified is the number of affordable rental units available to households with incomes at or below 30% of the median income. The gap tables show a gap of 6,115 units as 3,528 units were available to households of this income and 9,463 of families at this income level experiencing severe housing problems. When considering the number of households at or below 30% of median income who were severely cost burdened according to 2013-2017 CHAS data and the number of households with incomes at or below 50% of median income who also had at least one housing problem, it was estimated that 23,650 households might be at greatest risk of housing instability.

This analysis was consistent with Citizen Participation Surveys conducted during the development of the plan showing that 43% of respondents believe construction of new affordable rental housing units is the top priority for the use of HOME-ARP funds with 56% of respondents also identified affordable rental housing as the most needed housing solution.

And of 302 survey respondents, 146 identified mental health services as a need to be closed in assisting households to achieve housing stability.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The Asheville Regional Housing Consortium consists of Buncombe, Henderson, Transylvania, and Madison counties. The Consortium geography is covered by two different CoC organizations. The City of Asheville will be responsible for the solicitation process for all funds awarded under this HOME-ARP grant.

The City of Asheville anticipates publishing a Request for Proposals (RFP) to solicit the services of a qualified organization(s) capable of administering supportive services and of affordable housing developers to produce housing units which will be available for rent to all qualifying populations. The City will solicit proposals through a range of methods that can include the City's email listserv, purchasing website, social media, notices in the local newspaper, and press releases.

The proposal evaluation process will include the requirement that all proposals must have a Letter of Support from the CoC for the county or counties where the project will be located or where services will be provided.

The City will not undertake any project or activity which will prioritize one qualifying population over the other.

All funding awards will follow 2 CFR 200 procurement guidelines. Prior to accepting proposals for funding, the federal debarred contractor's list is referenced to determine applicants are in good standing.

Describe whether the PJ will administer eligible activities directly:

The City has elected to not administer eligible activities directly.

If any portion of the PJs HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The City did not provide any funds to a subrecipient or contractor that would be responsible for the administration of its entire HOME-ARP grant. Through a competitive Request for Qualifications (RFQ) process, the City awarded Baker Tilly US, LLP a contract to engage in consultation services with the overall goal of completing its HOME-ARP Allocation Plan for submission to HUD as an amendment to its Fiscal Year 2021 annual action plan for HUD review and acceptance. The services provided by Baker Tilly US, LLP are exclusive for the City's administration of the HOME-ARP program.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,000,000.00	21%	
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	
Tenant-Based Rental Assistance (TBRA)	\$0.00	0%	
Development of Affordable Rental Housing	\$3,100,000.00	66%	
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administrative and Planning	\$599,862.00	13%	15%
Total HOME-ARP Allocation	\$ 4,699,862.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

As illustrated in the chart above, the City will address the needs of qualifying households by allocating \$3,100,000.00 toward the Production and Preservation of Affordable Rental Housing. An additional \$1,000,000 of funds will be distributed to projects focused on expanding Supportive Services. Consultations with service providers during the development of the HOME-ARP Allocation Plan revealed that while TBRA and other HOME-ARP eligible activities would be beneficial for the community, they would have limited impact due to the limited availability of affordable housing units. These funds will be used to produce new affordable rental housing units and additional supportive services to allow for a greater utilization of existing TBRA funding.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provide a rationale for the plan to fund eligible activities:

There are currently nine (9) service providers who offer emergency shelter in the Asheville Buncombe CoC with additional providers in the surrounding counties. The data also showed that during the Point In Time survey, a total of 687 units were made available to veterans, this includes emergency shelter, transitional housing, permanent supportive housing, rapid rehousing, and other permanent housing. A total of 382 of these units made available to veterans were permanent supportive housing units and 131 were supported through rapid rehousing. It is hoped that these organizations can continue to provide these housing resources.

The greatest gap was found to be in units available for households having incomes of 0 to 30% of the median area income and with incomes between 31%-50% of the median income. Market data on rents shows that the Asheville Metropolitan Area has the highest rent in all of North Carolina. The data presented in this Allocation Plan showing the total number of households currently being assisted with housing who might become homeless without continued support, the total number of households with incomes not exceeding 30% of the median who also are experiencing severe cost burden, and the total number of households at 50% of the median income experiencing at least one of four housing problems, sums to 23,650 households. Funds to completely address this shortage in affordable housing has not been identified. The ability to add to the number of units available for extremely low-income and low-income households presents the greatest challenge for local government.

The City of Asheville also initiated a housing needs update as late as August 2019. In this update, there was an identified housing gap of affordable rental housing units for households with income 0%-30% of median income of an estimated 1,124 units. For households at 31%-50% of median income, there was an estimated gap of 1,044 units.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City estimates that 62 units of affordable rental housing will be produced with \$3,100,000 of the total allocation. This estimate was developed using a per unit cost of \$250,000 based on recent HOME project applications. The City estimates a per unit average subsidy amount of 20%, or \$50,000 per unit.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJs priority needs:

The consultation and public participation process identified a significant increase in the cost of rental housing in recent years as well as an extremely limited supply of available affordable rental units. This has made it difficult to fully utilize existing TBRA vouchers. By producing 62 units of affordable rental housing with \$3,100,000 of the total HOME-ARP allocation, the Consortium will alleviate some of the pressure from limited housing stock and will be able to better utilize existing housing vouchers. The Consortium intends to maximize the use of these funds by providing subsidy amounts for projects seeking other funding sources, such as LIHTC. This will allow the HOME-ARP affordable rental housing allocation to have the greatest possible impact.

Preferences

Identify whether the PJ intends to give preferences to one or more qualifying populations or a sub-population within one or more qualifying populations for any eligible activity or project:

Funds made available under this HOME-ARP Allocation Plan will not make use of preferences for any qualifying population.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJs needs assessment and gap analysis:

The City has determined that it will not give preferences to one or more qualifying populations or a sub-population within one or more qualifying populations for any eligible activity or project within its HOME-ARP Allocation Plan.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program.

The City has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity, but will secure evidence of coordination with the CoCs and their respective CE processes via required letters of support for projects from the relevant CoC Board. Non-profit partners and developers that utilize HOME-ARP funds will be responsible for application intake and review and will identify eligible clients.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered.

The City has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE.

The City has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any.

The City has elected not to use a Coordinated Entry process for referrals to a HOME-ARP project or activity.

Limitations in a HOME-ARP Rental Housing or NCS Project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act,

section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.

- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City has elected to not limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Implementation Notice.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City has elected to not limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Implementation Notice.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

The City has elected to not limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Implementation Notice.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. Consequently, the creation of refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#) is not applicable to the City's HOME-ARP Allocation Plan.

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity is not applicable at this time.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, requiring a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period is not applicable at this time.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

The City has elected not to use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, stating whether the new investment is being

made to maintain current affordable units and/or create additional affordable units is not applicable at this time.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

The City has elected not to use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, specifying a required compliance period is not applicable at this time.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, stating that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG within the refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#) is not applicable at this time.

- ***Other requirements in the PJs guidelines, if applicable:***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

Appendix A

Public Notice: Public Hearing and Public Comment Period Documentation

Citizen-Times Affidavit of Publication

CITIZEN-TIMES

PART OF THE USA TODAY NETWORK

AFFIDAVIT OF PUBLICATION

BUNCOMBE COUNTY

NORTH CAROLINA

City of Asheville
HOME-ARP Draft Allocation Plan
Notice of Public Hearing and Public
Comment Period

The City of Asheville has prepared a draft Allocation Plan for the HOME Investment Partnerships American Rescue Plan (HOME-ARP) Program. The draft Allocation Plan is being made available for public comment.

The draft Allocation Plan sets out how the City of Asheville and the Asheville Regional Housing Consortium propose to use an estimated \$4,699,862 in federal HOME-ARP Program funds.

Public Comment Period
The draft Allocation Plan will be posted on the internet at <https://www.ashevillenc.gov/departments/community-economic-development/public-notices/>; printed copies are available upon request and can be mailed. Written comments can be submitted through the City of Asheville Public Input page at the link listed above. The draft Allocation Plan will be available for public comment from March 6 through March 20.

Public Hearing
A public hearing held at the City Council meeting starting at 5:00 PM on Tuesday March 14 2023. Citizens are encouraged to offer comments and can find additional information on how to participate through the City of Asheville's Public Input platform at <https://www.ashevillenc.gov/departments/community-economic-development/public-notices/>. The agenda will be posted at <https://www.ashevillenc.gov/government/city-council-agenda/> which also contains links to how to watch City Council live, participate & comment.
February 15, 2023
000558

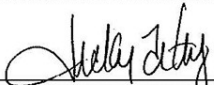
Before the undersigned, a Notary Public, duly commissioned, qualified and authorized by law to administer oaths, personally appeared said legal clerk, who, being first duly sworn, deposes and says: that he/she is the Legal Clerk of The Asheville Citizen-Times, engaged in publication of a newspaper known as The Asheville Citizen-Times, published, issued, and entered as first class mail in the City of Asheville, in Buncombe County and State of North Carolina; that he/she is authorized to make this affidavit and sworn statement; that the notice or other legal advertisement, a true copy of which is attached here to, was published in The Asheville Citizen-Times on the following date(s) 02/15/23. And that the said newspaper in which said notice, paper, document or legal advertisement was published was, at the time of each and every publication, a newspaper meeting all of the requirements and qualifications of Section 1-597 of the General Statutes of North Carolina and was a qualified newspaper within the meaning of Section 1-597 of the General Statutes of North Carolina.

Signed this 15th of February, 2023.



Legal Clerk

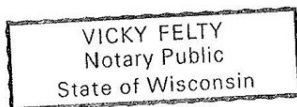
Sworn to and subscribed before the 15th of February, 2023



Notary Public of State of Wisconsin, County of Brown

919.25

My Commission expires.



(828) 232-5830 | (828) 253-5092 FAX
14 O. HENRY AVE. | P.O. BOX 2090 | ASHEVILLE, NC 28802 | (800) 800-4204

City of Asheville Notice- City Website

Public Notices

Last updated or reviewed on March 6, 2023

PUBLIC NOTICE: OPEN

HOME-ARP Draft Allocation Plan – Notice of Public Hearing and Public Comment Period

[Click here to read this notice in Spanish.](#)

The City of Asheville has prepared a draft Allocation Plan for the HOME Investment Partnerships American Rescue Plan (HOME-ARP) Program. The draft Allocation Plan is being made available for public comment.

The draft Allocation Plan sets out how the City of Asheville and the Asheville Regional Housing Consortium (ARHC) propose to use an estimated \$4,699,862 in federal HOME-ARP Program funds.

Public Comment Period

The draft Allocation Plan has been posted at the link below:

[DRAFT ARHC HOME – ARP Allocation Plan – Monday, March 6, 2023](#)

Printed copies are available upon request and can be mailed. Written comments can be submitted Miranda Masters at the email written below. The draft Allocation Plan will be available for public comment from March 6 through March 20.

Public Hearing

A public hearing held at the City Council meeting starting at 5:00 PM on Tuesday March 14 2023. Citizens are encouraged to offer comments and can find additional information on how to participate through the City of Asheville's Public Input platform at <https://www.ashevilenc.gov/department/community-economic-development/community-development/public-notices/>. The agenda will be posted at <https://www.ashevilenc.gov/government/city-council-agenda/> which also contains links to how to watch City Council Live, participate and comment.

To submit a written comment, please contact Miranda Masters at the email or mailing address below.

Email: mmasters@ashevilenc.gov

Mailing Address:

City of Asheville
Attn: Miranda Masters
70 Court Plaza
Asheville, NC 28801

Published: Monday, March 6, 2023 at 5:25 p.m.



Ciudad de Asheville
Borrador del plan de asignación HOME-ARP
Aviso de audiencia pública y
periodo de comentarios públicos

La Ciudad de Asheville ha elaborado un borrador del Plan de Asignación para el Programa HOME Plan de Rescate Americano de Asociación de Inversión (HOME-ARP). El borrador del Plan de Asignación está disponible para comentarios públicos.

El borrador del Plan de Asignación establece cómo la Ciudad de Asheville y el Consorcio de Vivienda Regional de Asheville proponen utilizar un estimado de \$4,699,862 en fondos federales del Programa HOME-ARP.

Periodo de comentario público

El borrador del Plan de Asignación se publicará en Internet en <https://www.ashevillenc.gov/department/community-economic-development/community-development/public-notices/>; las copias impresas están disponibles a pedido y se pueden enviar por correo. Los comentarios por escrito se pueden enviar a través de la página de comentarios públicos de la ciudad de Asheville en el enlace que se indica anteriormente. El borrador del Plan de Asignación estará disponible para comentarios públicos del **6 al 20 de marzo**.

Audiencia pública

Audiencia pública celebrada en asamblea del Ayuntamiento a partir de las **5:00 PM el martes 14 de marzo de 2023**. Se alienta a los ciudadanos a ofrecer comentarios y pueden encontrar información adicional sobre cómo participar a través de la plataforma de Comentarios Públicos (Public Input) de la Ciudad de Asheville en

<https://www.ashevillenc.gov/department/community-economic-development/community-development/public-notices/>.

El orden del día se publicará en <https://www.ashevillenc.gov/government/city-council-agenda/> que también contiene enlaces sobre cómo ver la sesión del Ayuntamiento en Vivo, participar y comentar.

Appendix B

Asheville Region HOME-ARP Community Resident Participation Survey- English

2/20/23, 8:13 AM

Asheville Regional HOME-ARP Community Resident Participation Survey

Asheville Regional HOME-ARP Community Resident Participation Survey

The Asheville Region is receiving federal funds from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing in Buncombe, Henderson, Madison and Transylvania counties. Your input will help determine the best uses of these funds.

To learn more about the HOME-ARP program, please visit the project page hosted by the City of Asheville: <https://www.ashevillenc.gov/projects/HOME-ARP>

1. Please indicate the area where you live.

- ☐ Buncombe County
- ☐ Henderson County
- ☐ Madison County
- ☐ Transylvania County
- ☐ City of Asheville
- ☐ Other

<https://forms.office.com/Pages/DesignPageV2.aspx?origin=NeoPortalPage&subpage=design&id=v2OTYdhbR0CwIFh91zJzkqd7tDQ-hipFheMyYQBP...> 1/8

2. What is your housing situation?

- ☐ Own your home
- ☐ Rent
- ☐ Live with others who own or rent
- ☐ Live in a shelter or transitional living center
- ☐ Live in assisted living or other group quarters
- ☐ Live on the street, in a car, or in a homeless encampment
- ☐ Other

3. If you own your home, how long have you owned it?

- ☐ 1 year or less
- ☐ 1 to 2 years
- ☐ 3 to 5 years
- ☐ 5 to 9 years
- ☐ 9 years or more

6. What is your total household income?

- ☐ Less than \$26,850
- ☐ \$26,850 - \$44,749
- ☐ \$44,750 - \$53,699
- ☐ \$53,700 - \$71,599
- ☐ \$71,600 - \$89,499
- ☐ \$89,500 - \$107,399
- ☐ \$107,400 or more

7. What is your household size?

- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5+

4. If you rent your home, how long have you rented in your current location?

- ☐ 1 year or less
- ☐ 1 to 2 years
- ☐ 3 to 5 years
- ☐ 5 to 9 years
- ☐ 9 years or more

5. What is your age?

- ☐ Under 25
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65+

8. Race (optional information)

- ☐ Black/African American
- ☐ American Indian/Alaskan Native
- ☐ Asian American
- ☐ Hawaiian/Pacific Islander
- ☐ Multi-Racial
- ☐ White
- ☐ Choose not to respond
- ☐ Other

9. Ethnicity (optional information)

- ☐ Hispanic
- ☐ Non-Hispanic

10. What would be the maximum amount you could pay for rental housing per month?

- ☐ less than \$500
- ☐ \$500-\$700
- ☐ \$701-\$900
- ☐ \$900-\$1,100
- ☐ more than \$1,100

11. Have you observed significant unmet housing or service needs for specific populations (veterans, persons with disabilities, persons experiencing homeless or at-risk of homelessness, victims of domestic violence, human trafficking, etc.)? If so, please describe.

12. The following is a list of potential uses for HOME-ARP funding to address homelessness and lack of affordable housing. Please rank these options starting with what you believe is the highest priority. (Use the up/down arrow on the right side of each option to change the ranking order. The arrows will appear when you hover over the option)

Construction of new affordable rental housing units for low to moderate income individuals (Example: a family of 3 with a household income of \$68,050 or less)

Additional emergency shelter units for those experiencing homelessness (no cost for individuals to use these units for a limited period of time)

Housing vouchers for low to moderate income individuals (Example: a family of 3 with a household income of \$42,550 or less)

Additional supportive services for people experiencing homelessness or at risk of homelessness (Examples of supportive services include: mental health counseling, transportation, legal, financial, employment, etc.)

13. HOME-ARP funds can be used for housing solutions targeted at lower income individuals and families that range from short-term emergency shelters to longer-term permanent housing options. What do you think is the single greatest need for housing in the community?

- ☐ Non-congregate emergency shelters (short-term accommodations for individuals currently experiencing homelessness)
- ☐ Transitional housing with supportive services (temporary housing for a period of 1-2 years with supportive services to help individuals and families transition to permanent housing)
- ☐ Affordable rental housing units (long-term permanent housing for low income

14. What do you believe is the most needed service for individuals at risk of or currently experiencing homelessness?

- ☐ Transportation services (either public or personal vehicles)
- ☐ Mental health services
- ☐ Legal services
- ☐ Financial counselling services
- ☐ Employment related services
- ☐ Other

15. Please provide any other information or feedback that would help identify local projects and services for this new federal funding.

Appendix C

Asheville Region HOME-ARP Community Resident Participation Survey- Spanish

2/20/23, 8:15 AM

La Región de Asheville HOME-ARP Encuesta Publica

La Región de Asheville HOME-ARP Encuesta Publica

La región de Asheville recibe fondos federales del Programa de Sociedad de Inversión en el Hogar Plan de Rescate Americano (HOME-ARP) para financiar diversos proyectos y servicios que tienen por objeto reducir la cantidad de personas sin hogar y aumentar la disponibilidad de viviendas accesibles en Buncombe, Henderson, Madison and Transylvania condados. Sus comentarios ayudarán al región a determinar la mejor manera de utilizar dichos fondos.

Para aprender más sobre la programa de HOME-ARP, por favor visite la página del proyecto alojada por La Ciudad de Asheville: <https://www.ashevillenc.gov/projects/HOME-ARP>

1. Por favor indique el área donde vive.

- ☐ Buncombe County
- ☐ Henderson County
- ☐ Madison County
- ☐ Transylvania County
- ☐ City of Asheville
- ☐ Other

2. ¿Cuál es su situación de vivienda?

- ☐ Propietario de su vivienda
- ☐ Alquila
- ☐ Vive con otras personas que son propietarias o alquilan
- ☐ Vive en un refugio u otro centro de vivienda de transición
- ☐ Vive en un centro de vivienda asistida u otras residencias grupales
- ☐ Vive en la calle, en un vehículo o en un campamento de personas sin hogar
- ☐ Other

3. Si es propietario de su hogar, ¿hace cuánto tiempo que lo es?

- ☐ 1 año o menos
- ☐ 1 a 2 años
- ☐ 3 a 5 años
- ☐ 5 a 9 años
- ☐ 9 años o más

6. ¿Cuáles son los ingresos totales de su hogar?

- ☐ Menos de \$26,850
- ☐ \$26,850 - \$44,749
- ☐ \$44,750 - \$53,699
- ☐ \$53,700 - \$71,599
- ☐ \$71,600 - \$89,499
- ☐ \$89,500 - \$107,399
- ☐ \$107,400 o más

7. ¿Cuál es el tamaño de su hogar?

- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5 o más

4. Si alquila su hogar, ¿hace cuánto tiempo que alquila en su lugar actual?

- ☐ 1 año o menos
- ☐ 1 a 2 años
- ☐ 3 a 5 años
- ☐ 5 a 9 años
- ☐ 9 años o más

5. ¿Cuál es su edad?

- ☐ Menos de 25
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65 o más

11. ¿Notó necesidades insatisfechas significativas de vivienda o servicios de poblaciones específicas (veteranos, personas con discapacidades, personas sin hogar o en riesgo de quedarse sin hogar, víctimas de violencia doméstica, trata de personas, etc.)? De ser así, descríbalas.

12. La siguiente es una lista de usos potenciales de los fondos de HOME-ARP para hacer frente a la situación de sin hogar y la falta de viviendas accesibles. Le pedimos que clasifique estas opciones en una escala de 1 a 4, en la que 1 es lo que usted considera que es la prioridad más alta y 4 es la más baja.

Construcción de nuevas unidades de viviendas de alquiler accesibles para personas de ingresos bajos a moderados (ejemplo: una familia de 3 con ingresos del hogar de \$68,050 o menos)

Unidades de refugios de emergencia adicionales para personas sin hogar (sin costo para las personas que utilizan dichas unidades durante un período limitado)

Vales de viviendas para personas de ingresos bajos a moderados (ejemplo: una familia de 3 con ingresos del hogar de \$42,550 o menos)

Servicios de apoyo adicionales para personas sin hogar o en riesgo de quedarse sin hogar (los ejemplos de servicios de apoyo incluyen orientación de salud mental, de transporte, legales, financieros, de empleo, etc.)

8. Raza (información opcional)

- ☐ Negro/afroamericano
- ☐ Indio americano/nativo de Alaska
- ☐ Asiático americano
- ☐ Hawaiano/islas del Pacífico
- ☐ Multirracial
- ☐ Blanco
- ☐ Prefiere no responder
- ☐ Other

9. Etnicidad (información opcional)

- ☐ Hispánico
- ☐ No Hispánico

10. ¿Cuál sería el monto máximo que podría pagar por mes por una vivienda de alquiler?

- ☐ Menos de \$500
- ☐ \$500-\$700
- ☐ \$701-\$900
- ☐ \$900-\$1,100
- ☐ Más de \$1,100

13. Los fondos de HOME-ARP se pueden utilizar para soluciones de vivienda orientadas a personas y familias de ingresos más bajos que van de refugios de emergencia de corto plazo a opciones de vivienda permanente de más largo plazo. ¿Cuál considera que es la mayor necesidad de vivienda en la comunidad? Elija solo una.

- ☐ Refugios de emergencia no congregados (alojamiento de corto plazo para personas actualmente sin hogar)
- ☐ Viviendas de transición con servicios de apoyo (viviendas temporales para un período de 1-2 años con servicios de apoyo para ayudar a las personas y familias en su transición a una vivienda permanente)
- ☐ Unidades de viviendas de alquiler accesibles (viviendas permanentes de largo plazo)

14. ¿Cuál considera que es el servicio más necesario para las personas actualmente sin hogar o en riesgo de quedarse sin hogar? Elija solo uno.

- ☐ Servicios de transporte (vehículos públicos o personales)
- ☐ Servicios de salud mental
- ☐ Servicios legales
- ☐ Servicios de asesoramiento financiero
- ☐ Servicios relacionados con el empleo
- ☐ Other

15. Incluya toda otra información o comentario que ayudaría a identificar proyectos y servicios para estos nuevos fondos federales.

Asheville Region HOME-ARP Stakeholder Survey

2/20/23, 9:03 AM

Asheville HOME-ARP Stakeholder Survey

Asheville HOME-ARP Stakeholder Survey

The City of Asheville, NC is receiving federal funds from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing. Your input will help

1. What is the name of your organization?

2. What type of organization do you work for?

*A definition of qualifying populations as defined by the Department of Housing and Urban Development (HUD) can be found within HUD's Final HOME-ARP Implementation Notice.

- ☐ Homeless service provider
- ☐ Domestic violence/dating violence/human trafficking, etc. service provider
- ☐ Veterans' groups and/or service provider
- ☐ Public housing agencies (PHAs)
- ☐ Public agencies that address the needs of the qualifying populations as defined in CDP-21-10*
- ☐ Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
- ☐ Other

3. Please indicate which area(s) your organization serves.

(you may select multiple service areas)

- ☐ Buncombe County
- ☐ Henderson County
- ☐ Madison County
- ☐ Transylvania County
- ☐ City of Asheville
- ☐ Other

4. What income levels does your organization serve?

- ☐ Extremely low income limit (30% of median) or less
- ☐ Very low income limit (50% of median) or less
- ☐ Low income limit (80% of median) or less
- ☐ N/A - my organization serves all income levels.

5. Based on your experience working with various unserved and/or underserved populations, please rank the issues you believe are the highest priority at this time, starting with the highest priority. (Use the up/down arrow on the right side of each option to change the ranking order. The arrows will appear when you hover over the option)

Lack of affordable rental housing

Types of housing available do not fit the needs/desires of the residents (apartments v. single family, size of unit, etc.)

Barriers to accessing housing (criminal background, poor credit, etc.)

Lack of financial assistance (vouchers, down payment assistance, etc.)

Lack of supportive services or case management to connect individuals with available housing

Lack of emergency shelter units

6. Please rank the following eligible uses of HOME – ARP funds in terms of priority, starting with the highest priority.

Development of more affordable housing

Rental Assistance

Supportive Services

Acquisition and development of non-congregate shelters

Nonprofit operating assistance

Nonprofit capacity building assistance

7. Are there specific populations (veterans, persons with disabilities, persons experiencing homeless or at-risk of homelessness, victims of domestic violence, human trafficking, etc.) that you believe should be prioritized for the use of HOME-ARP funding due to significant unmet housing or supportive service needs? If so, please describe.

8. Has your organization turned away or placed individuals on a wait list for housing or services in the last year due to lack of capacity/resources?

☐ Yes

☐ No

9. If you selected 'yes' to the question above, please select the number of individuals turned away due to lack of capacity/resources from the ranges provided below.

☐ 0-24

☐ 25-50

☐ 51-100

☐ 101-150

☐ 151-200

☐ 200 or more

☐ N/A my organization has not turned away or wait listed anyone in the last year

10. If you answered yes to question 7 above, please provide additional detail to help us understand the gap in services. Information on the type of service or housing that was requested, the number of individuals that were unable to be served, and the reason service could not be provided.

11. To help us better understand what additional resources organizations need to provide services and housing, please provide additional information on the amount of additional funding your organization needs to meet current demand. Any additional information that you can provide on how this funding would be used by your organization would be beneficial.

12. Please provide any other information or feedback that would help identify local projects and services for this new federal funding.

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Appendix E

Public Comment Received

Public Comment #1

Asheville City Council Meeting

HOME-ARP Public Hearing

March 14, 2023

"I guess what my problem is, I moved to Asheville in 2020. I had plenty of money, I am disabled, financially exploited, domestic violence, I live in an apartment because I am on social security disability that is \$1,600. I make \$1,500. I don't know where to go for vouchers. I was dealing with Philip Hardin, you know the 18 months. I am 58 years old. I lived in Florida, I had a house, a car, a good job. So this is demeaning to me. All I want...I realize it is 18 months, they are going to evict me. They just said they are going to start the process today or tomorrow. I want to be able to go to school so I can better myself. I don't know how to get funding for that. I don't know how to get vouchers so I can see if my apartment will take it or if I can find a private owner of a home or a townhome, you know, so I can live without fear. And then, someone has remotely accessed my internet, I know who it is, I had a 50B against that person, I had people come to my house to look at it all. I said I need a cyber forensic person because they have never seen this type of infiltration. So I went 6 months without a phone, without internet, I got into a car accident in July. I have no family here. I couldn't even get to the hospital. And no one cares. It is in your general assembly. I told Philip Harding, I told Stoney Bevins, I am sorry. That doesn't do me any good. Who will help me? I said to Philip Hardin, so I am close to the time are you going to give me money for a tent. I don't even have a car to live in. He won't sign the deed, the title, so I can get insurance. This was in July. I am 50 years old and I walk to the store. So all these reports are awesome and I read, I do a lot of research, but it is report, report, reports. Nobody does anything. Show me the end result of these reports. Who is going to help me? It is 18 months Sherly, find something else. I would find something else, but how am I going to get there. Does anybody have any answers?"

Public Comment #2

Comment Received via e-mail

March 15, 2023

Ms. Masters,

I'm writing to offer public comment on behalf of Helpmate on the Draft AHRC HOME-ARP Allocation Plan.

Page 5 of this plan includes this information:

From July 2021 to June 2022 there were 5,312 domestic violence calls made in Buncombe, Henderson, Madison, and Transylvania Counties. These calls involved 6,095 persons needing services including householder and children. An overwhelming number of these incidents reported were within Buncombe County with 4,413 victims. A significant number of these incidents also took place in Henderson County with a total number of 1,072 incidents reported. Where gender was reported 4,755 of these victims were Women and 880 were Men. A total of 99 of these incidents involved hospitalization and 654 resulted in shelter stays. It was necessary to refer 8 clients to other facilities due to lack of availability.

These data are flawed in an important way. As you can see from the attached letter, domestic violence programs in the HOME catchment area were forced to refer 481 clients to other facilities due to lack of availability. This is an important difference for several reasons:

1. Domestic violence is a leading cause of homelessness, so shelter for survivors must be a key part of addressing homelessness in our area.
2. The data that demonstrates that 481 people (392 from Buncombe County) could not be sheltered in their home community underscores the pressing need to expand availability of specialized emergency shelter beds for domestic violence survivors.
3. Asheville's lack of emergency shelter capacity for domestic violence survivors has a regional impact, as survivors not sheltered in Helpmate's shelter are most often connected with domestic violence shelters in surrounding communities.

Purchase and development of non-congregate shelter is an allowable HOME-ARP cost. Survivors who are fleeing domestic violence are eligible for support under the HOME-ARP guidelines. The ARHC Region Homeless Needs Inventory demonstrated a deficit of 345 emergency shelter beds in the region. The Point in Time count revealed that there were 41 unsheltered domestic violence victims on the date of the count.

Given that it appears that the funding priorities for the draft HOME-ARP allocation plan do not include any funding eligibility for emergency shelter programming, and that those priorities were based on

inaccurate information (as referenced above), I strongly urge and request that the HOME Consortium reconsider its funding priorities to include emergency shelter expansion for domestic violence survivors.

Thank you,

April Burgess-Johnson

Helpmate | Executive Director

she, her, hers



828-254-2968 ext 113 (Business)

828-254-0516 (Hotline)

abjohnson@helpmateonline.org

PO Box 2263

Asheville, NC 28802

Appendix F

Response Regarding Data Misrepresentation- State of North Carolina



**Council for Women
& Youth Involvement**
Danielle M. Carman | Executive Director

Roy Cooper | Governor
Pamela B. Cashwell | Secretary

Sage Turner, Chair
HOME Regional Consortium
70 Court Plaza
Asheville NC 28801

Dear Ms. Turner,

Due to an error in our dataset on the Council for Women and Youth Involvement website, the information concerning "Referrals to shelters/housing alternatives due to lack of capacity" was underreported. The correct number should be 481 referrals due to lack of capacity.

Agency	County	July-Dec 2021	Jan-June 2022	Total
Helpmate, Inc.	Buncombe	262	130	392
Safelight, Inc.	Henderson	41	0	41
My Sister's Place of Madison, Incorporated	Madison	21	27	48
Shelter Available for Family Emergency, SAFE, Inc. of Transylvania County	Transylvania	0	0	0

Thank you so much for allowing me to make this correction. If you have any questions or concerns, please contact me.

Sincerely,



Sandra Ross

(she/her)

**Communications and Research Specialist
Council for Women and Youth Involvement**

984-236-0342

sandra.ross@doa.nc.gov

116 West Jones St., Raleigh, NC 27603

1320 Mail Service Center

ncadmin.nc.gov

Mailing
1320 Mail Service Center
Raleigh, NC 27699-1320



ncadmin.nc.gov

Location
116 West Jones St. | Raleigh, NC 27603
984-236-0331 T

Response to Public Comment- City of Asheville



MEMORANDUM

TO: Nikki Reid, Director of Community & Economic Development
FROM: Miranda Masters, HOME ARP Analyst
DATE: Mar 27, 2023
SUBJECT: HOME-ARP Allocation Plan - Public Comment Summary

As part of the HOME-ARP Allocation Plan development process for HUD, residents must be provided with an opportunity to comment on the proposed Allocation Plan for no less than 15 calendar days and at least one Public Hearing must be held during the development of the Plan. The draft Allocation Plan was available for Public Comment from March 6 through March 20, 2023. A Public Hearing was held at the Asheville City Council meeting on Tuesday, March 14, 2023.

The City has reviewed and accepted all comments and recommendations that were received during the Public Comment period and Public Hearing, as well as those submitted via Citizen Participation Surveys from January 17 through January 25, 2023. All comments and recommendations received were considered as part of the HOME-ARP Allocation Plan development process. The City received one written comment during the Public Comment period and one verbal comment during the Public Hearing.

The verbal comment received during the Public Hearing was primarily focused on housing vouchers and supportive services to connect individuals with resources, such as housing vouchers. Through the consultation process it was determined that the Allocation Plan should not include additional funding for Tenant Based Rental Assistance due to the difficulty in utilizing existing vouchers because of the lack of housing stock. The Allocation Plan attempts to alleviate these issues by providing funding for affordable rental housing which will create additional housing stock where vouchers can be utilized, and by providing funding for supportive services which can be used to help connect individuals and families with resources.

The written comment received during the Public Comment period was related to the need for additional shelter capacity, specifically for individuals fleeing or attempting to flee domestic violence. The need for additional shelter capacity was also identified during the consultation and public participation process, however, it was determined that affordable rental housing and supportive services was the highest and best use of the HOME-ARP funding based on previous plans and studies, surveys, data, and feedback received during the consultation process.

The written comment received during the Public Comment period also noted a minor discrepancy with domestic violence shelter referral data provided by the State of North Carolina. The City obtained corrected data from the State of North Carolina and the final plan was updated with the new data.

RESOLUTION NO. 23- 69

RESOLUTION AUTHORIZING THE CITY MANAGER TO SUBMIT THE HOME ARP ALLOCATION PLAN AS A SUBSTANTIAL AMENDMENT TO THE 2021-2022 ANNUAL ACTION PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

WHEREAS, the City of Asheville is the Lead Entity on behalf of the Asheville Regional Housing Consortium (ARHC) for the federal Home Investment Partnerships Program (HOME); and

WHEREAS, the City must submit to the U.S. Department of Housing and Urban Development (HUD) as an amendment to the 2021-2022 fiscal year an Allocation Plan detailing its proposed use of \$4,699,862.00 of HOME-ARP funds; and

WHEREAS, the City has prepared an amendment to the 2021-2022 Annual Action Plan to demonstrate how these HOME-ARP funding resources are to be allocated; and

WHEREAS, a public hearing was held on March 14, 2023, to obtain citizen input and comments on the draft plan; and

WHEREAS, in compliance with HUD requirements, the draft plan has been made available to the public for comment for the period beginning March 6, 2023 and through March 20, 2023;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ASHEVILLE THAT:

1. City Council approves the submission to HUD of the HOME-ARP Allocation Plan and Amendment to the 2021-2022 Annual Action Plan.
2. City Council authorizes the City Manager to sign all contracts, grants and loan agreements, after approval by the City attorney, with HUD and other designated agencies for the HOME-ARP Allocation Plan.

Read, approved and adopted this 28th day of March, 2023.


City Clerk


Mayor

Approved as to form:


City Attorney

HOME-ARP CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

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

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

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

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.


Signature of Authorized Official

3/29/2023
Date

City Manager

Title

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Asheville

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

56-600224

* c. UEI:

WTHRNF CARBL9

d. Address:

* Street1:

70 Court Plaza

Street2:

* City:

Asheville

County/Parish:

Buncombe County

* State:

NC: North Carolina

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

28801-3507

e. Organizational Unit:

Department Name:

Community and Economic Develop

Division Name:

Community Development

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

Prefix:

* First Name:

Nikki

Middle Name:

* Last Name:

Reid

Suffix:

Title:

Community & Econ. Development Dept. Director

Organizational Affiliation:

City of Asheville

* Telephone Number:

828-259-5729

Fax Number:

* Email:

nreid@ashevillenc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

City of Asheville HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

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

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="4,699,862.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="4,699,862.00"/>

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

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:



* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


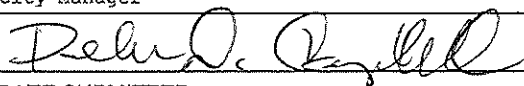
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager 
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Asheville	3/28/2023

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

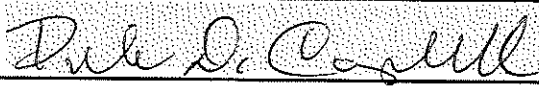
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Asheville	DATE SUBMITTED 3/28/2023