

# FY23-24 CAPER

# Consolidated Annual Performance and Evaluation Report (CAPER)

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### Introduction

The FY 2023-2024 Consolidated Annual Performance and Evaluation Report (CAPER) highlights the results and benefits produced by the City of Raleigh as projected in the City's FY 2023-2024 Annual Action Plan.

The CAPER covers July 1, 2023, to June 30, 2024, and represents the third year of reporting within the City's Five-Year Consolidated Plan period (2021-2025). The Consolidated Plan (ConPlan) serves as a five-year road map and includes comprehensive goals and coordinated strategies to address the housing and community needs of low- and moderate-income residents. The 2021-2025 ConPlan specifies three priorities for the City's use of federal and local housing funds:

- 1) Increasing the Supply of Affordable Housing
- 2) Enhancing the Homeless to Housing Continuum
- 3) Increase Services to Build Self-Sufficiency & Sustainability

Programs described in the CAPER are funded by both federal and local funds. The federal funds include:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)

The local funds include:

- Program Income from past local Housing Bonds
- City of Raleigh's General Fund
- 2020 Housing Bond Funds

Programs offered by the City of Raleigh positively impacted the lives of homeowners, homebuyers, renters, people experiencing homelessness, job seekers, and those assisted by non-profits. The City continued using CDBG funding for the activities of neighborhood revitalization, housing rehabilitation, homebuyer assistance, infrastructure upgrades, emergency shelter operations, white flag emergency shelter support, and public service grants to non-profits. HOME funds were used for housing rehabilitation, homebuyer assistance, and loans for affordable housing developers. ESG funds were awarded to nonprofits to provide assistance to those experiencing or at-risk of homelessness.

FY 2023-2024 Results-At-A-Glance				
Activity	Quantity Served			
Houses Repaired and Rehabilitated	28			
New or Preserved Affordable Rental Units	576			
Individuals Receiving Home-buying Counseling	120			
Households Provided Homebuyer Assistance	63			
Individuals Benefitted by Community Enhancement				
Grants	2,483			
After-School Youth Supported	2,375			

Individuals Provided Emergency Shelter	1,126
Households Receiving Rapid Rehousing Services	59
Individuals Receiving Job Training	12

During the pandemic, the City also received special supplemental allocations of CDBG-CV and ESG-CV to assist impacted low-income households. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which was officially created on March 27, 2020, to respond to the growing effects of this historic public health crisis. In addition, the City received funding from the U.S. Department of Treasury for the Emergency Rental Assistance (ERA) program to assist renters affected by the pandemic.

### **CR-05 - Goals and Outcomes**

### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

The FY 2023-2024 Consolidated Annual Performance and Evaluation Report (CAPER) describes the results and benefits produced by the City of Raleigh as projected in the City's FY 2023-2024 Annual Action Plan, which is the fourth year of the 2021-2025 ConPlan. The ConPlan specifies three priorities for the City's use of federal and local housing funds:

- 1) Increasing the Supply of Affordable Housing
- 2) Enhancing the Homeless to Housing Continuum
- 3) Increase Services to Build Self-Sufficiency & Sustainability

Programs offered by the City of Raleigh provided assistance to homeowners, homebuyers, renters, people experiencing homelessness, job seekers, as well as households impacted by COVID-19. Specific geographic areas were chosen for neighborhood revitalization and focused funding. While most programs are available to income-eligible residents citywide, the geographic focus areas are the College Park Neighborhood Revitalization Strategy Area (NRSA) and downtown neighborhoods. The City has also invested resources, particularly the 2020 bond funds, to provide targeted homebuyer downpayment assistance and housing rehabilitation programs to areas along the proposed Bus Rapid Transit (BRT) corridors.

These investments addressed the priorities of increasing the supply of affordable housing, enhancing the homeless-to-housing continuum, and increasing services to build self-sufficiency and sustainability. The following charts provide a summary of activities completed to address each priority. The charts list the goal (priority), activity categories, funding sources, outcome indicators, accomplishments expected and achieved during the Consolidated Plan period, and the accomplishments expected and achieved during the program year.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete	
Enhance the Homeless to	Homeless	ESG: \$1,363,706	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	51	111	218%	23	59	197%	
Housing Continuum			Homeless Person Overnight Shelter	Persons Assisted	2,858	3,089	108%	1,585	1,126	89%	
CDBG:	CDBG: \$16,148,578 /	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,322	0	0%	0	0	0%		
Increase & Preserve	Affordable	HOME: \$10,449,707 /	HOME:	Rental units constructed	Household Housing Unit	2,250	1,116	50%	550	284	63%
Supply of Affordable	Housing	Affordable Housing Fund/Bond:	Homeowner Housing Rehabilitated	Household Housing Unit	250	70	28%	53	28	53%	
Housing		\$31,693,000 / Other: \$665,000	Direct Financial Assistance to Homebuyers	Households Assisted	250	143	57%	28	63	225%	
			Buildings Demolished	Buildings	6	8	133%	1	3	500%	
			Other	Other	5	0	0%	0	0	0%	
Increase Services to Build Self-	Homeless Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0%	0	0	0%	
Sufficiency & Sust	Build Self- Sufficiency & Community	2,750,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,655	9,772	267%	5,260	3,470	66%	

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	Facade treatment/business building rehabilitation	Business	20	0	0%	0	0	0%
	Homeowner Housing Added	Household Housing Unit	0	41	100%	0	0	100%
	Homeless Person Overnight Shelter	Persons Assisted	6,000	1,374	23%	0	0	0%
	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0%	0	0	0%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

### Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City used federal and local funds to address the three priorities identified in its 2021-2025 Consolidated Plan and met its goals in most categories. Summaries of the City's FY 2023-2024 funding activities, are:

### • Increase and Preserve the Supply of Affordable Housing

The City's Affordable Housing Improvement Plan set a goal of increasing the pace and volume of affordable housing development. This goal was addressed through City-sponsored creation and preservation of affordable housing units as well as down payment assistance to eligible homebuyers.



Oak Forest Pointe - 120 Rental Units of Senior Affordable Housing

The City continues to invest significant resources in creating and preserving affordable rental units throughout the City, particularly in areas around transit corridors. Previous investments of nearly \$7 million by the City have resulted in the completion of 284 rental made available to residents in FY 2023-2024. The City committed nearly \$25 million in FY 2023-2024 toward the future creation and preservation of 1,017 units of affordable rental opportunities, including units set aside for supportive housing.

A summary of the City's investments in completed or preserved subsidized apartment communities follows:

Rental Development	City Assistance \$	Number of Units	Funding Source
Primavera	\$4,400,000	164	Local – General Fund
Oak Forest Pointe	\$2,500,000	120	Local – General Fund
Total	\$6,900,000	284	

In addition to these investments, the following projects were approved for City financing for new construction and preservation during the FY2023-2024 fiscal year:

### July 1, 2023 – June 30, 2024

Rental Development	City Assistance \$	Number of Units	Funding Source
4314 Poole Road	\$668,000	9	City-Owned Land
919 @ Cross Link	\$3,100,000	142	Local - General Fund
Battle Bridge	\$5,000,000	200	Local - General Fund & Federal ERA2
Cottages of Idlewild	\$2,582,000	18	Local - Bond Fund
Hoke Street Apartments	\$3,175,000	120	Local - Bond & Federal ERA2
Iris Ridge	\$2,150,000	50	Federal – HOME
Lorimer Spring	\$1,250,000	60	Local- Bond Fund
Parkside Apartments	\$5,760,000	144	Local – General Fund & Local – Bond Fund
New Construction Subtotal	\$21,803,000	725	
Avonlea Apartments	\$528,000	44	Local – General Fund
Jeffries Ridge	\$384,000	32	Federal – ERA2
Madison Glen	\$1,440,000	120	Federal - HOME
Ripley Station	\$576,000	48	Federal – ERA2
Tryon Grove	\$576,000	48	Federal – ERA2
Preservation Subtotal	\$3,120,000	292	

City of Raleigh's Consolidated Annual Performance and Evaluation Report 2023-2024

Total	\$24,923,000	1,017	
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Purchasing a home helps families and individuals invest in their future. The homebuyer assistance program helps low-and-moderate-income households who want to purchase a home but require additional funding. In FY23-24, the City increased the maximum assistance amount for the citywide Homebuyer Assistance Program from \$20,000 in FY 21-22 to \$45,000. The City spent a total of \$180,000 in CDBG to assist six low-income households in purchasing their first house through down-payment assistance. Twenty-six buyers utilized this program to purchase a home with \$600,000 in local bond funds.

Even with the City's financial assistance, high interest rates and Raleigh's hot housing market have presented challenges, and many first-time homebuyers have been unable to find homes at a price they can afford. In the spring of 2023, the City introduced the Enhanced Homebuyer Assistance Program. The Enhanced program, which is funded by the 2020 Affordable Housing Bond, provides up to \$60,000 in financial assistance to income-eligible first-time homebuyers purchasing a home in targeted geographic areas within Raleigh. These targeted neighborhoods surround the planned Bus Rapid Transit (BRT) routes in order to create affordable homeownership opportunities near transit. Ten buyers utilized this new program in FY23-24 to purchase a home with \$600,000 in bond funds.

### **Homeowner Rehabilitation Program**

The City's Homeowner Rehabilitation Program provides financial assistance to eligible households to make critical repairs to their homes, enabling them to maintain ownership. Not only does this program help prevent homeowners from needing more expensive home repairs in the future, it also provides them with safe and healthy homes. \$834,901 in HOME funds and \$736,811 in CDBG funds assisted 16 low-income homeowners with substantial repairs (at least 3 systems failing). In addition, four households benefitted from the City's Limited Repair Program, which provides forgivable loans to very low-income homeowner households.

The City also introduced the Raleigh Home Revitalization Program, which provides additional bond-funded home repair assistance for the transit-targeted neighborhoods for income-eligible homeowners. Eight homes were repaired in the fiscal year utilizing \$264,149.50 in City bond funds for this program.

The effects of COVID-19 have impacted the construction industry, leading to supply chain issues and increased material prices. These factors continue to present challenges to the City's rehab programs, in addition to the ongoing difficulty of finding and recruiting contractors who are interested in participating in the programs.

Funding Source	Amount Spent	Homes Completed
HOME-funded Homeowner Rehabs	\$834,901.00	9
CDBG-funded Homeowner Rehabs	\$736,811.00	<del>12</del> 7
CDBG-funded Limited Repair Rehabs	\$56,286.89	4
City-funded Home Revitalization Rehabs	\$264,149.50	8
Total	\$1,627,988.89	28

### • Enhance the Homeless to Housing Continuum:

The City provided a total of \$255,809 in ESG funding to provide rapid re-housing assistance (Triangle Family Services), and to support the Wake County Homeless Management Information System (HMIS). The City also provided \$100,000 in CDBG funds to the South Wilmington Street Men's Shelter for shelter operations and \$100,000 in CDBG funds to St. John's Metropolitan Community Church to support white flag emergency shelter operations. In addition, \$68,000 in local funds were awarded to Catholic Charities for their Support Circle program, which provides rapid re-housing and homelessness prevention assistance. Given the ongoing effects of COVID-19, emergency shelters continued implementing social distancing requirements, which resulted in reduced bed capacity.

Funding Recipient	Activity	Quantity Served
Triangle Family Services	Rapid Re-housing	47 households
South Wilmington Street Men's Shelter	Emergency Shelter	438 individuals
St. John's Metropolitan Community Church	White Flag Emergency Shelter	688 individuals
Catholic Charities	Homelessness Prevention	12 households

The City also continues to support Oak City Cares, a multi-service center, that serves as a centralized access point for connecting individuals and families who are at risk of or experiencing homelessness to coordinated

services, by contributing \$100,000 in local funds to assist in weekend and holiday meal distribution to the homeless.



**Oak City Cares** 

### • Increase Services to Build Self-Sufficiency and Sustainability:

During the past year, one-day homebuyer training workshops were held once a month by our local partner, DHIC. These workshops provided potential homebuyers with information on the mortgage loan process, credit reporting, how to find a home, insurance, and home inspections, as well as information about various down payment assistance options. Homebuyer training was provided to 292 households.

The City of Raleigh continues to administer its CDBG-funded Community Enhancement Grant program which awards funding to non-profits to provide essential public services to low- to moderate-income households such as providing afterschool tutoring and support services for 2,375 low-income students, and housing opportunities and wrap-around services for 84 foster youth transitioning out of the program when turning 18 years of age.

### **CR-10 - Racial and Ethnic composition of families assisted**

### Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

Race	CDBG	HOME	ESG
White	676	3	*
Black or African American	2,661	23	*
Asian	25	1	*
American Indian or American Native	29	0	*
Native Hawaiian or Other Pacific Islander	4	0	*
Other/Multi	351	1	*
Total	3,769	28	*
Hispanic	389	2	*

Not Hispanic	3,380	26	*

### Table 2 – Table of assistance to racial and ethnic populations by source of funds \*To be reported via SAGE

#### Narrative

As shown in the table, the majority of program beneficiaries were members of racial minority groups. The largest group served was "Black or African-American." A small but growing percentage of those assisted were of Hispanic ethnicity.

### CR-15 - Resources and Investments 91.520(a)

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year	
CDBG	public - federal	\$3,219,488.00	\$4,153,300.69	
HOME	public - federal	\$1,852,392.00	\$2,669,372.00	
ESG	public - federal	\$255,809.00	\$214,187.77	
Other – Local (Bond and tax rate)	public - local	\$23,892,131.00	\$18,103,607.00	

#### Identify the resources made available

Table 3 - Resources Made Available

### Narrative

In addition, the City received a supplemental \$4,550,487 allocation of CDBG-CV funds through the CARES Act in 2020. Of this amount, \$1,387,110.62 was carried over from FY21-22, of which \$551,869.85 was expended in FY23-24. The City also made available nearly \$24 million in City funds during the past program year, which accounted for the majority (70%) of the money spent on programs for low- and moderate-income households and individuals.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CITYWIDE	80%	98.4%	Most of the housing and community development programs the City of Raleigh offers are available to low-income residents throughout the city
Downtown Neighborhoods	5%	0%	No activities with FY23-24 federal funds

NRSA 2016 - College Park/ECP	15%	1.6%	One housing rehabilitation was completed in the NRSA. It utilized \$104,787 in HOME funds. \$300,000 in local bond funds assisted 5 income-qualified buyers with downpayment assistance. The new Fisher St. park was completed in FY 22-23 as well as the completion of the 91 single-family homes in East College Park.
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Table 4 – Identify the geographic distribution and location of investments

### Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

**City of Raleigh:** The City of Raleigh has prioritized investing in affordable housing and community development programs. In the past year, federal dollars were leveraged with local funding.



Fisher Street Park in East College Park

As the City invests in affordable housing within its borders using federal grant funds, it also tapped local City of Raleigh funds for projects and programs such as:

- Lending to private builders of affordable apartments;
- Repairing older owner-occupied houses;
- Assisting the NC 507 Wake County Continuum of Care;
- Providing on-going support to Oak City Cares multi-service facility;
- Providing rapid re-housing and homelessness prevention funds to Catholic Charities for those who are CAPER 14

homeless or at-risk of becoming homeless;

• Supporting nonprofit organizations engaged in affordable housing development and providing other services directed at low-income populations.



Ripley Station - 48 Rental Units of Preservered Affordable Rental Units

**Affordable Apartments**: Increasing the supply of rental apartments for low-and-moderate-income residents is an overwhelming need in the City of Raleigh. Using federal and local funds, the City partners with other funders (such as Wake County and the NC Housing Finance Agency) and affordable housing developers to create and preserve rental housing. Most of the affordable apartment loans provided by the City are a portion of the entire investment package to create new affordable apartments, with low-income housing tax credits and private loans being the other major sources of funds.

The City also awarded \$2 million in Small-Scale Development program funds from the 2020 Affordable Housing Bond to two infill development projects by Southeast Raleigh Promise and CASA, which will create a total of 34 affordable rental units.

The City's rental units are City-owned properties that provide housing for low-income renters under 50% AMI. As mentioned in previous sections, the East College Park program utilized land acquired by the City to create homeownership opportunities for low-to-moderate-income buyers.

Fiscal Year 2023 Summary – HOME Match					
1. Excess match from prior Federal fiscal year	\$27,750,507.13				
2. Match contributed during current Federal fiscal year	\$12,634,356.97				
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$40,384,864.10				
4. Match liability for current Federal fiscal year	\$137,751.98				
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$40,247,112.12				

Table 5 – Fiscal Year Summary - HOME Match Report

						I	Match Contri	butions for	
Part   Participant Ide	ntification						Match Contributions for Federal Fiscal Year (yyyy) 2023		yyy) 2023
. Participant No. (assigned t			tion			3. Name of Contact (p	erson completi	ng this report	t)
54077 Street Address of the Parti		f Raleigh				4. Contact's Phone Nu	mber (include	area code)	
421 Fayetteville St.,								96-4330	
City Raleigh		7.	State NC	8. Zip Code 27601					
Part II Fiscal Year Su	mmary		NO	27001					
1. Excess mate	h from prior Fee	leral fiscal year				\$ 27,	750,507.13		
2. Match contri	buted during cu	rrent Federal fiscal y	ear (see Part III.9.)			\$ 12,0	634,356.97		
3. Total match	available for cu	rent Federal fiscal y	ear (line 1 + line 2)					\$	40,384,864.10
4. Match liabilit	y for current Fe	deral fiscal year				-		\$	0.00
5. Excess mate	h carried over t	o next Federal fiscal	year (line 3 minus line	e 4)				\$	40,247,112.12
art III Match Contrib	ution for the Fe	ederal Fiscal Year				7. Site Preparation,			
1. Project No. or Other ID	2. Date of Contribution (mm/dd/yyyy)	<ol> <li>Cash (non-Federal sources)</li> </ol>	4. Foregone Taxes, Fees, Charges	5. Appraised Land / Real Property	6. Required Infrastructure	Construction Materials, Donated labor	8. Bor Financ		9. Total Match
East College Park	11/15/2022						27,	633.37	27,633.3
East College Park	02/09/2023							930.00	930.0
Grosvenor Gardens	11/15/2022	2,000,000.00							2,000,000.0
Kings Ridge	11/30/2022	1,529,414.00							1,529,414.0
5508 Western Blvd	11/01/2022	1,524,555.19							1,524,555.1
Milner Commons	07/24/2023	1,475,000.00							1,475,000.0
Oak Forest Pointe	10/05/2022	396,250.00							396,250.0
Oak Forest Pointe	02/02/2023	396,250.00							396,250.0
Booker Park South	11/22/2022	300,000.00							300,000.0
Primavera	02/14/2023	1,760,000.00							1,760,000.0
Nalnut Terrace	05/01/2023	562,500.00							562,500.0

Name of the Participating Jurisdiction								Federal Fiscal Year (yyyy)
Raleigh, NC								FFY23
1. Project No. or Other ID	2. Date of Contribution (mm/dd/yyyy)	3. Cash (non-Federal sources)	4. Foregone Taxes, Fees, Charges	5. Appraised Land / Real Property	6. Required Infrastructure	7. Site Preparation, Construction Materials, Donated labor	8. Bond Financing	9. Total Match
Pines at Peach	04/05/2023	2,265,574.41						2,265,574.41
Oak Forest Pointe	06/30/2023	396,250.00						396,250.00

#### Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE Report

Program Income – Enter the program amounts for the reporting period						
Balance on hand at Amount received during Total amount expended Amount expended for Balance on hand a						
reporting period	during reporting period	TBRA	of reporting period			
\$	\$	\$	\$			
\$528,455.61	\$821,471.39	\$0	\$131,776.43			
	Amount received during reporting period \$	Amount received during reporting period \$	Amount received during reporting period \$Total amount expended during reporting period \$Amount expended for TBRA \$			

Table 7 – Program Income

Minority Busi	Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar					
value of conti	racts for HOME	projects comp	leted during the	e reporting per	iod	
	Total		Minority Busin	ess Enterprise	5	White Non-
		Alaskan	Asian or	Black Non-	Hispanic	Hispanic
		Native or	Pacific	Hispanic		
		American	Islander			
		Indian				
Contracts						
Number	9					9
Dollar	\$833,339					\$833,339
Amount						
Sub-Contract	S					
Number	55			19	14	22
Dollar	\$280,200			\$112,740	\$69,960	\$99,500
Amount						
	Total	Women	Male			
		Business				
		Enterprises				
Contracts						
Number	9		9			
Dollar	\$833,339		\$833,339			
Amount						
Sub-Contract	S					
Number	55	3	52			
Dollar	\$280,200		\$32,511.00			
Amount						

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property - Indicate the number of H	HOME assisted rental property owners
and the total amount of HOME funds in these rental properties	assisted

	Total		Minority Property Owners				
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic	
Number	0						
Dollar	0						
Amount							

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of
relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	\$0
Businesses Displaced	0	\$0
Nonprofit Organizations	0	\$0
Displaced		
Households Temporarily	0	\$0
Relocated, not Displaced		

Households	Total		White Non-			
Displaced		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0					
Cost	\$0					

Table 10 – Relocation and Real Property Acquisition

### CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	1,305	1,173
Number of Non-Homeless households to be		
provided affordable housing units	2,500	3,169
Number of Special-Needs households to be		
provided affordable housing units	2	94
Total	3,807	4,436

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	40	12
Number of households supported through		
The Production of New Units	450	284
Number of households supported through		
Rehab of Existing Units	53	28
Number of households supported through		
Acquisition of Existing Units	1	0
Total	544	324

Table 12 – Number of Households Supported

### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The impacts of COVID-19 on the construction industry have slowed production in the City's rehabilitation programs as well as multifamily unit production. Backorders or unavailability of building supplies slowed the rehab/construction process. These supply chain issues also led to increased material prices, which further dampened production. Another economic impact of COVID-19 was a drastic rise in interest rates, which caused more delays in multifamily construction due to the increase in lending costs for developers. The City of Raleigh missed the one-year production goals set in the Annual Action Plan with the completion of 284 affordable apartments, all of which were supported by local funds. Additional affordable apartment communities are still under construction (the units will be counted in future CAPERs once they

are completed). Additionally, the City approved funding assistance for the construction of 725 affordable apartments, and preservation of 292 affordable units.

High interest rates and a hot housing market in Raleigh also slowed the uptake of the City's homebuyer assistance programs. Many first-time homebuyers have been unable to find homes at a price they can afford, even with the City's financial assistance. This year, 63 buyers were assisted through the programs.

In FY 2023-24, there were nine elderly households assisted through the Homeowner Rehabilitation and Limited Repair programs. CDBG Community Enhancement Grant resources were provided to the Hope Center at Pullen which worked with 84 Special Needs youth aging out of the foster care system to obtain housing vouchers, support, and set-aside units. These programs helped the City far exceed the goal for Special Needs households.

### Discuss how these outcomes will impact future annual action plans.

The impacts and uncertainties associated with COVID-19 and subsequent years of inflation, including rising construction and material costs, may impact future affordable housing goals. City staff continues to monitor and will update if needed.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual	
Extremely Low-income (ELI)	2,668	1	
Low-income (LI)	697	8	
Moderate-income (MOD)	404	18	
Total	3,769	27	

Table 13 – Number of Households Served

### **Narrative Information**

As reflected in the table above, the City of Raleigh addresses the needs of a variety of income groups below 80% of the area median income. 67% percent of people and households served using CDBG were classified as Extremely Low-Income (0-30% of area median income). CDBG resources were used last year to support homebuyer training (120), CDBG homebuyer loans (12) and HOME homebuyer loans (18), CDBG Housing rehabilitations (11) and HOME rehabilitations (9), and a variety of services delivered through local nonprofit partners/subrecipients (2,483 persons assisted with the CDBG Community Enhancement Grant). The City focuses its local general fund and bond resources on helping create new affordable rental units and addressing severely-cost burdened renters, defined as a Worst Case

Need by HUD. Additional HOME funds were spent on housing rehabilitation for homeowners and rental development of King's Ridge and The Summit at Sawyer. However, these projects were not completed in FY 2023-2024. Once they are complete, the data will be included in future CAPERs.

Twenty-nine (29) MOD buyers received Homebuyer Assistance and Downpayment Assistance through CDBG and HOME. Three ELI (Extremely Low Income) and seventeen low-income homeowners received Homeowner Rehab assistance through CDBG and HOME, progressing efforts to address substandard housing, also defined as a Worst Case Need by HUD. 1,515 ELI, 643 LI, and 325 MOD individuals received Public Services assistance through the City's CDBG Community Enhancement Grant programs. Homebuyer counseling was provided to 40 ELI, 141 LI, and 196 MOD individuals. The ELI, LI, and MOD homeowners and renters assisted met HUD's Sec. 215 definition of affordable housing.

See table below for income limits for FY 2023-2024.

Percent of Area		Family Size							
Median Income	1	2	3	4	5	6	7	8	
Extremely Low - 3	<b>0%</b> \$23,80	0 \$27,200	\$30,600	\$34,000	\$36,750	\$39,450	\$42,200	\$44,900	
Very Low - 5	<b>0%</b> \$39,70	0 \$45,350	\$51,000	\$56,650	\$61,200	\$65,750	\$70,250	\$74,800	
Low - 8	<b>0%</b> \$63,50	0 \$72,550	\$81,600	\$90,650	\$97,950	\$105,200	\$112,450	\$119,700	

#### HUD Income Limits for Raleigh Metropolitan Statistical Area - FY23-24

### CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

### Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Raleigh partners with the NC 507 Continuum of Care (CoC), Haven House (interim lead applicant), Oak City Cares (interim coordinated entry manager), Urban Ministries (interim HMIS lead), Wake County Government, and nonprofit homeless service providers to ensure everyone is working together to make homelessness rare, brief, and nonrecurring. In addition, a City staff member serves on the NC 507 governing board.

The CoC works closely with the City, County, and service providers and conducts the annual Point-in-Time (PIT) count and Housing Inventory Counts (HIC) for the Annual Homeless Assessment Report (AHAR), as required by HUD. The PIT is an annual snapshot in time of persons meeting HUD's definition of "homeless" on a single night in the last ten days of January.

In order to receive an ESG grant from the City, service providers must complete individualized assessments to identify the need for shelter, prevention, or rapid rehousing. Most service providers and shelters are using the VI-SPDAT tool to conduct uniform assessments in HMIS to identify acuity/vulnerability. The City also continues to support Oak City Cares, which serves as a centralized access point for connecting individuals and families, who are at risk of, or are experiencing homelessness, to coordinated services.

### Addressing the emergency shelter and transitional housing needs of homeless persons

Strengthening the homeless-to-housing continuum and the need for permanent supportive housing for those experiencing or at-risk of homelessness was identified as a top priority in the City of Raleigh's 2021-2025 Consolidated Plan. A City staff person has a seat on the NC 507 Wake County Continuum of Care (CoC) governing board and is actively involved with the CoC in developing and promoting the Coordinated Entry system, plans, establishing priorities, and working with service providers. City ESG funds supported programs offered by Triangle Family Services (rapid rehousing) and Urban Ministries to support HMIS. Additionally, the City provided \$100,000 of CDBG toward operating expenses for the Wilmington Street Shelter, the Countyowned emergency shelter for homeless men, \$100,000 of CDBG to St. John's Metropolitan Community Church to support white flag emergency shelter operations, and \$68,000 in local funds to Catholic Charities for homelessness prevention and re-housing.

In addition, the City allocates a portion of its CDBG entitlement funds to the Community Enhancement Grant Program which supports nonprofits providing public services to low to moderate-income individuals and families. Funds for this fiscal year were awarded through a competitive process to programs that provided bedding and essential furnishings to formerly homeless families, after-school tutoring, and workforce development for young adults.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Every two years, the City issues a competitive Request for Proposals (RFP) solicitation for Emergency Solutions Grant (ESG) projects that serve those who are homeless or at risk of homelessness. This is done in coordination with Wake County. Both the City and County apply similar criteria communitywide, requiring a Housing First approach, the use of the Homeless Management Information System (HMIS), and involvement with Coordinated Entry. All ESG subrecipients are required to use HMIS, so data can be tracked and shared, and connect clients to mainstream resources. By partnering on this initiative, the City and County can better strategically deploy funding to meet community needs.

The City also contributed \$100,000 in local funds to support weekend and holiday meal distribution at Oak City Cares, a multi-service center that holistically addresses the various needs of those experiencing or at-risk of homelessness, and \$68,000 in local funds to Catholic Charities' "Support Circles" rapid rehousing and homelessness prevention program. With a combination of counseling and financial assistance, the Support Circles program helps re-house families.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City is committed to helping ensure that those who are experiencing homelessness become

rapidly and stably housed. As noted in the previous section, the City partners with the County to issue their RFP for ESG projects that serve those who are homeless or at risk of homelessness.

All ESG-funded agencies are required to adhere to the CoC's Written Standards and Coordinated Entry Policies and Procedures Manual. The CoC also follows a Housing First approach with Rapid Re-Housing, homelessness prevention, and emergency shelter, which has helped reduce the length of time (LOT) homeless for persons in emergency shelters. The model used in reducing veteran homelessness continues to be applied to single chronically homeless women, a demographic that has been increasing.

### **CoC NOFO Funding**

In FY 2023, the Wake County NC 507 Continuum of Care (CoC) received \$4,593,951 from HUD in CoC NOFO funding for the following organizations and projects:

- CASA (formerly Community Alternatives for Supportive Abodes) McKinney: \$200,632
- Haven House Inc. CoC Planning Project Application FY2023: \$200,000
- Haven House Inc. RRH Homeless Youth 18-24 FY2023: \$106,495
- Passage Home, INC Ruth House II- FY 2023: \$265,335
- PLM Families Together Families Together Renewal Project Application FY2023: \$152,480
- The Family Violence Prevention Center, Inc., dba InterAct InterAct DV Bonus FY2023: \$533,890
- The Women's Center of Wake County TWC Integrative, Permanent Community Supportive Housing: \$209,796
- Triangle Family Services Renewal Project Application FY23: \$237,415
- Wake County Continuum of Care, Urban Ministries (Originally granted to DBA Raleigh/Wake Partnership to End and Prevent Homelessness) -NC507 HMIS FY2023: \$153,100
- Wake County Continuum of Care, Oak City Cares (DBA Raleigh/Wake Partnership to End and Prevent Homelessness) NC507 SSO-CE FY2023: \$168,066
- Wake County Housing Affordability & Community Revitalization 2-1-2024 to 1-31-2025 Fully Consolidated Wake Rental Assistance NC0090L4F072316: \$2,366,742

### CR-30 - Public Housing 91.220(h); 91.320(j)

### Actions taken to address the needs of public housing.

### **Public Housing Program:**

The overall mission and operation of subsidized public housing is to provide safe, decent, affordable rental housing for low- to moderate-income families. In addition to creating an affordable living environment, opportunities are offered to promote personal responsibility and self-sufficiency of residents. Public housing rentals in our city come in all sizes and types, from scattered, single-family houses to high-rise apartments. Raleigh Housing Authority (RHA) owns and manages 1,248 subsidized housing rentals. There is a waiting list of approximately 3,000 applicants for public housing. Most applications are seeking one- and two-bedroom units. Preferences are given to applicants including those who live or work in Wake County, work full time, are elderly (62+), or are disabled. Two mid- and high-rise communities provide designated housing to elderly and/or disabled individuals and families. RHA operates four site-based incentive public housing maintains a 95% occupancy rate and turns over a vacancy in with HUD's required standards.

### Housing Choice Voucher (HCV) Program:

RHA administers 3,921 Housing Choice Vouchers and has a utilization rate of 97%. These tenant-based vouchers increase access to safe, affordable housing units and provide opportunities for low-income families to choose and obtain rental housing outside areas of poverty or minority concentration. Currently, there are approximately 9,000 applicants on the voucher waitlist. Availability is based on voucher turnovers and funding levels. There are local preferences for the elderly, disabled, working, residents who live or work in Wake County, and graduates of the Ready to Rent program. RHA also provides special admissions to homeless families and families experiencing domestic violence through the Coordinated Entry System, the Olmstead Act, displaced families, and VAWA.

### Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The Raleigh Housing Authority (RHA) recognizes successful management of its local public housing developments input from those served. To this end, the existence and recognition of viable, representative, and democratic resident councils exist in several public housing communities. These councils are critical for achieving participation and cooperation from RHA

tenants. This organization knows the needs of their neighbors and coordinates the delivery of community service programs primarily for public housing residents. The Resident Advisory Board is chosen from this organization. RHA consults with the Advisory Board on all administrative and Agency Plans. These meetings provide an avenue for open dialogue between the residents and the agency. Resident input is important when considering changes to the operations, procedures or regulations which directly affect residents or the services RHA provides. Additionally, resident input and feedback forms have been made available to all households. Incentivizing public housing residents to participate in self-sufficiency and homeownership training programs annually is critical.

#### Actions taken to provide assistance to troubled PHAs

The Raleigh Housing Authority continues to be rated as a high performer by HUD's management assessment system for public housing. RHA works efficiently and effectively to prevent misuse and waste of HUD resources. The Raleigh Housing Authority recognizes the growing need for affordable housing and seeks ways to protect and develop affordable housing for the citizens of Raleigh. RHA recently completed its first Strategic Plan which will help support the Agency in meeting its goals and missions over the next five years.

### CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

In the 2023-2024 fiscal year, CD staff continued to improve and increase outreach efforts to low-income residents. The 2024-2025 Annual Action Plan process included a survey in English and Spanish that had more than 700 responses. Increased media outreach, in-person open houses, and presentations to local stakeholders have also extended the City's efforts to bridge the digital divide.

Given the current political climate in North Carolina, it remains unlikely that any municipality will receive state legislative approval to implement local ordinances requiring private developers to provide affordable housing, however, new incentives in the rezoning approval process have been implemented. Duplexes, Townhomes, and Accessory Dwelling Unit housing unit types by right in most of Raleigh are notable housing development options introduced through the City's development ordinance that hold the potential to incentivize private unsubsidized housing that is within reach of renters or owners of moderate means. Raleigh is also working on a pilot program with a new community land trust to add to/preserve the supply of affordable ownership housing units in the City.

The City Council approved a new Transit-Oriented Development zoning category to provide density bonuses for residential developments along the planned Bus Rapid Transit (BRT) routes. The City is currently in the process of applying this zoning to parcels within the identified Transit Overlay District (TOD) areas in order to encourage affordable housing unit production in close proximity to transit for low-to-moderate-income households.

In FY 2022-2023, the City activated the Public Project Community Support Fund (PPCSF) pilot, using local dollars, to support businesses and residents in designated areas to offset the impacts of large-scale public investments in the New Bern Avenue Bus Rapid Transit (BRT) Corridor and the Dix Edge Study area. The goals of the PPCSF include:

- Grow community capacity
- Mitigate construction impacts to businesses and residents
- Encourage equitable business and residential growth and expansion
- Enhance physical and community connections

To achieve these goals, the City has partnered with Southeast Raleigh Promise (SERP) and Carolina Common Enterprise (CCE) to provide support services for residents in areas where large-scale City investments are underway. Services include the implementation of multifaceted neighborhood outreach and engagement in four (4) target neighborhoods in Southeast Raleigh to provide support for residents such as financial education, estate planning, foreclosure prevention, and homeowner improvements. In addition, support services include assistance to existing small and medium-sized businesses through the creation of a Legacy Business Preservation Program.

### Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

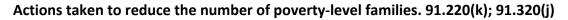
Last year, the City managed and operated 199 affordable rental housing units that it owns. The average rent was \$650.79 and 84% of the units were rented to households below 50% of the area median income. Eighty-six percent of occupants in City-owned rentals were racial minorities.

The City continued to work in partnership with NC-507 Wake County Continuum of Care (CoC), Wake County Human Services, and nonprofit homeless service providers to address the needs of those experiencing or at risk of becoming homeless. City staff also serves the CoC Governance Board.

In June 2016, City Council approved a tax increase to support affordable housing in the City. The introduction of this funding source has resulted in over \$8 million annually in commitments for affordable units through the preservation of existing affordable units, creation of new affordable units, and single-family housing rehabilitation. In November 2020, Raleigh voters approved an Affordable Housing bond of \$80 million with a bond ballot record 72% of voters in approval. In 2023-2024, the City utilized bond funds to support property acquisition and gap financing for rental developments, particularly in areas in proximity to high-frequency transit.

### Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Lead- based paint (LBP) remediation is an integral part of the City's housing rehab program. All rehabs of owner-occupied homes are tested for lead-based paint and any LBP found is appropriately remediated.





The Raleigh Community and Small Business Development Division awarded two grants, with a combined total of \$99,000 in CDBG funds, to two nonprofits to provide job training and workforce development services. StepUp Ministry and the YMCA of the Triangle offer programs that provide training for low- and moderate-income residents and connect them to job opportunities.

The City received \$25,612,354 in funding from the U.S. Department of Treasury for the Emergency Rental Assistance (ERAP) program. The ERAP funding was distributed in two separate grants called ERA1 (14,298,567) and ERA2 (11,313,787). The ERA funds were allocated to the House Wake COVID-19 Financial Assistance Program (HWFAP), which provides emergency rental and utility assistance to residents in Raleigh and Wake County. The HWFAP was created through a

partnership between the City and Wake County Government, and both agencies contracted with Telamon Corporation to serve as the program administrator.

The application period for HWFAP opened in March 2021 and closed in January 2022. Raleigh and Wake County residents could apply for a maximum of eighteen (18) months of rental and utility assistance. ERA funds could be used to pay rental and utility arrears as well as current and future rent and utility expenses. To be eligible for the HWFAP, applicants had to demonstrate a financial hardship related to COVID-19 and have a household income at or below eighty-percent (80%) of the Area Median Income (AMI).

Approximately 10,520 applications were received from city and county residents combined, and 5,366 applicants were approved for assistance. A total of \$23,372,961 in city ERA funds was used to provide direct assistance to 3,686 households in Raleigh. A total of \$2,239,393 in city ERA funds was not needed for direct assistance to residents. Federal regulation allows the City to use the remaining ERA funds for affordable rental housing purposes, and these funds have been added to the City's affordable rental development program. Thus far, \$1,536,000 in ERA funds have been allocated to three affordable rental development projects named Jeffries Ridge (\$384,000), Ripley Station (\$576,000), and Tryon Grove (\$576,000).

This spring, HUD reviewed and approved the City's HOME-ARP Allocation Plan. The Allocation Plan, which was submitted as an amendment to the City's FY21-22 Action Plan outlines how the City will spend the \$5.2 million in HOME-ARP funds it was awarded as part of the American Rescue Plan. These funds will be used to develop affordable rental housing and a non-congregate shelter.

During the pandemic, the City also received special supplemental allocations of CDBG-CV and ESG-CV to assist impacted low-income households. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which was officially created on March 27, 2020, to respond to the growing effects of the historic public health crisis. The City's use of these funds helped 5,287 people in FY 2023-2024 with rental assistance, emergency shelter beds, and long-term organizational support to increase capacity for the homeless. Combined with assistance provided in previous years, the CARES Act funds have assisted more than 20,000 affected by the impacts of the pandemic within the City of Raleigh.

CDBG-CV1&3					
Agency	Funded Amount	Activities			
DHIC	\$234,051	Foreclosure prevention			
Legal Aid	\$634,000	Eviction prevention			
Oxford House	\$166,000	Emergency rental assistance			
Passage Home	\$425,387	Emergency rental assistance and public facility improvements			
Raleigh/Wake Partnership to End & Prevent Homelessness	\$199,000	Housing Navigation Unit & Access Hub			
Telamon	\$640,000	Foreclosure/eviction prevention and housing transition services			
Triangle Family Services	\$417,334	Eviction prevention and consumer credit counseling			
Families Together	\$693,000	Emergency shelter and transitional housing improvements			
Green Chair Project	\$444,291	Beds for formerly homeless families			
InterAct	\$300,001	Emergency shelter operations and improvements			
Oak City Cares	\$38,183	Laundry/shower facilities for persons experiencing homelessness			
WakeMed	\$358,840	Emergency after-care shelter for homeless patients with COVID-19			
TOTAL	\$4,550,087				

ESG-CV1 & 2				
Agency	Funded Amount	Activities		
Catholic Charities	\$149,618	Rapid Re-Housing; Homelessness Prevention		
Families Together	\$503,580	Rapid Re-Housing; Emergency Shelter		
Healing Transitions	\$459,594	Emergency Shelter		
InterAct	\$660,183	Shelter Operations and Rapid Re-Housing		
Legal Aid	\$216,000	Homelessness Prevention		
Passage Home	\$380,875	Rapid Re-Housing; Homelessness Prevention		
Raleigh/Wake Partnership to End & Prevent Homelessness	\$360,850	HMIS		
Salvation Army	\$69,800	Emergency Shelter		
Triangle Family Services	\$1,039,706	Rapid Re-Housing; Homelessness Prevention; Emergency Shelter; Street Outreach		
USCRI (U.S. Committee for Refugees and Immigrants NC Field Office)	\$98,952	Homelessness Prevention		
Urban Ministries	\$514,293	Emergency Shelter		
TOTAL	\$4,453,451			

### Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The institutional structure for delivering CDBG programs and services to low and very-low income families and individuals involves public, private, and non-profit agencies. Partnerships are utilized internally as well.

Nonprofit organizations also play a key role in providing rapid re-housing and emergency shelter services to those experiencing homelessness. Several nonprofits are providing various services, including medical and mental health services, on the site of Oak City Cares. The City also distributes CDBG funds to nonprofits providing public services to low-income households. Last year, the City provided funds (CDBG, HOME, local) for local nonprofit developers and for-profit firms for site improvements and to build affordable housing in the City. In FY 2023-2024, the City continued selling lots it has assembled, primarily with CDBG funds, and is working with developers who will provide mixed-income homeownership opportunities in the NRSA through multiple townhome projects. The City also put parcels it owns in central downtown out for proposals to provide additional affordable rental units that will be captured in future performance reports.

The Community and Small Business Division and the Planning and Development Department have worked together over the past couple of years to review policies and procedures that identify and eliminate obstacles to producing affordable housing. The coordination has reduced plan review times and fees for affordable housing projects.

### Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City requires written commitments from nonprofit organizations applying for financial assistance to provide affordable housing for persons with disabilities. The written commitments require social service agencies to be involved with the non-housing needs of their residents.

### Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Below are the City-related impediments identified in the regional Analysis of Impediments completed in 2020, followed by City actions to address them:

• Lack of affordable housing in high-opportunity areas: On September 3, 2015, the Raleigh City Council adopted the Affordable Housing Location Policy (AHLP) which encourages the development of City-supported affordable housing in high-opportunity areas. The following

year an affordable housing fund (>\$8 million per year) was created. In November 2020, Raleigh voters approved an \$80 million Affordable Housing Bond that includes funds for projects and acquisition opportunities near planned transit routes, such as the forthcoming Bus Rapid Transit (BRT) lines.

In the spring of 2023, the City introduced the Enhanced Homebuyer Assistance Program. The Enhanced program, which is funded by the 2020 Affordable Housing Bond, provides up to \$60,000 in financial assistance to income-eligible first-time homebuyers purchasing a home in targeted geographic areas within Raleigh. These targeted neighborhoods surround the planned Bus Rapid Transit (BRT) routes in order to create affordable homeownership opportunities near transit. The City also increased the maximum assistance amount for the citywide Homebuyer Assistance Program from \$20,000 to \$45,000.

In addition to the updates to the homebuyer assistance programs, the City also introduced the Raleigh Home Revitalization program that provides additional bond-funded home repair assistance for the transit-targeted neighborhoods with up to \$30,000 for income-eligible homeowners.

• Limited housing choice restricts access to community assets for members of the protected classes: The Wake Transit Plan will increase the percentage of the County's jobs within ¾ mile of all-day transit service. The City of Raleigh completed the Equitable Development Around Transit (EDAT) initiative to guide development expected to spring up near Bus Rapid Transit (BRT) stations and routes. The City is using annual affordable housing goals (570 total) to measure progress in providing additional affordable housing units and the City is looking for acquisition opportunities along proposed BRT lines for inclusion of affordable housing on City land. The City has created an excellent framework for advancing fair housing through its Comprehensive Plan, Raleigh 2030. Decision-making, particularly in rezoning matters, that is consistent with this document will further the City's commitment to affirmatively further fair housing choice.

• Fair Housing Hearing Board has no legal authority to enforce its ordinance: Local complaints received by the City are referred to the Fair Housing Project of Legal Aid of North Carolina and the Fair Housing Justice Center, which have the resources and expertise to address fair housing complaints. In the future, the City may join with Wake County to establish a countywide human relations commission with adequate enforcement and investigative authority to resolve local complaints. The City may also explore expanding the Board's own legal authority and hiring additional staff assigned to the Board.

The City of Raleigh entered into an agreement with the Campbell University Law Clinic to

expand the availability of legal resources for tenants facing eviction in a new City of Raleigh Housing Justice Project. The City has been using some of its American Rescue Plan Act (ARPA) funds to provide \$100,000 a year to assist with staffing costs. The City has also designated an additional \$200,000 to provide the Clinic with a fund to assist with settlements of eviction cases, which will further help in keeping more residents in their homes and their rental histories free of evictions.

• RCAPs (Racially Concentrated Areas of Poverty) are clustered in the City of Raleigh, found primarily where lower-income Black and Hispanic residents live. All of these areas are located within very low and low-opportunity areas. In September 2015, the City adopted an Affordable Housing Location Policy (AHLP) to steer most of its affordable housing investments only to areas outside of RCAPs. City staff created an updated AHIP working draft with current housing tables to help launch the new Plan which will be updated with the assistance of consultants. The City continues to support homebuyer education, sponsors the building of affordable houses on City-owned sites, and provides low-interest second mortgages to make many sales within reach of lower-income families who otherwise may not be able to buy a house in the unsubsidized market. The number of Racially Concentrated Areas of Poverty decreased from nine in 2015 to four in 2024.

### CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Monitoring CDBG, CDBG-CV, ESG, and ESG-CV projects consists of five major components:

- Grant Applications: Request for funding applications are made on a standard form and are evaluated by a team. Points are given for each criterion covering community need, program effectiveness, financial record, and capacity of the organization. Recommendations for funding are based on the evaluation of the above criteria and presented to the City Council for approval and included in each Annual Action Plan.
- 2. Pre-agreement meeting: The project manager meets with each subrecipient to go over grant requirements, logistics for payments, record-keeping standards, future monitoring, and close-out.
- 3. Agreements: The City of Raleigh enters into standard grant agreements with each subrecipient that specify the amount, source, and use of funds, match requirements,

reporting standards, record-keeping, results to be achieved, and other conditions specific to the project. A standard attachment of all federal standards (Executive Orders, Civil Rights Act, etc.) with which the agency must comply is included.

- On-site monitoring: The project manager, based on a risk assessment, will visit each funded agency at least once in the 12-month term of the contract to assure compliance. Due to COVID-19, these visits are currently occurring virtually.
- 5. Progress reports: Written statements of benefits produced with the grants provided are required with each payment request as well as a summary at the end of the project.

HOME funds are provided annually in a competition that leverages low-income housing tax credits. Loan agreements are executed with each borrower that includes federal requirements and on-site monitoring consistent with the HOME regulations are conducted to review unit condition and programmatic compliance.

The FY 2022-2023 Action Plan included an updated HOME Monitoring Plan to guide City staff in assuring program compliance with federal requirements.

### Citizen Participation Plan 91.105(d); 91.115(d)

### Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Draft 2023-2024 CAPER was advertised for public comment in three local newspapers and the City's website on September 9<sup>th</sup>, 2024, providing 15 days for comments through September 24<sup>th</sup>.

### CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City received a special supplemental allocation of CDBG-CV to assist low-income households during the pandemic. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which was created on March 27, 2020, to respond to the growing effects of this historic public health crisis. The City awarded \$4,550,487 in CDBG-CV1 and CDBG-CV3 funds to nonprofits providing emergency rental assistance, eviction prevention, foreclosure mitigation counseling, emergency shelter operations and improvements, public facilities improvements, laundry/shower facilities for persons experiencing homelessness, emergency after-care shelter for homeless patients with COVID-19, and coordinated access support. The City continues to monitor the effects of COVID-19 and whether any programmatic adjustments will be needed.

### Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

### CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based on the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Project Name	Developer	Fund Type	# of Units	Date Monitored	Results
Hope Crest	CASA	HOME	10	8/23/2023	non-compliant
Oak Hollow	CASA	HOME	10	8/23/2023	non-compliant
Salisbury Apartments	CASA	HOME	10	8/23/2023	noncompliant
Perry Hill	Evergreen Construction	HOME	48	8/27/2023	compliant -
Autumn Spring	Evergreen Construction	HOME	48	8/30/2023	compliant
Wakefield Spring	Evergreen Construction	HOME	80	9/7/2023	compliant
Village of New Hope	Evergreen Construction	HOME	45	9/12/2023	compliant
Lennox Chase	DHIC	HOME	37	6/13/2024	compliant
Emerson Glen (Camden Glen)	DHIC	HOME	48	6/25/2024	compliant
Elder's Peak	Pendergraph	HOME	48	6/26/2024	compliant
Brookridge	DHIC	HOME	41	6/27/2024	compliant

The results of the FY 23-24 monitoring are below.

### Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

All HOME-supported rehabs underway are to minority borrowers. Every developer receiving HOME funds from the City is required to have and follow an Affirmative Marketing Plan. All HOME borrowers are advised of the HOME requirements for affirmative marketing, and City staff monitor each HOME-financed apartment community to ensure compliance. Recent monitoring of these communities has found compliance with HOME regulations.

Each loan agreement signed between the City and organizations receiving development loans contains the following:

Affirmative Marketing: Borrower shall adopt affirmative marketing procedures and

requirements for the rental housing project pursuant to 24 CFR Section 92.351, as may be amended. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability.

The affirmative marketing requirements and procedures adopted must include:

1. Methods for informing the public, owners, and potential tenants about fair housing laws and the City of Raleigh's affirmative marketing policy.

2. Requirements and practices Borrower must adhere to in order to carry out the City's affirmative marketing procedures and requirements.

3. Procedures to be used by Borrower to inform and solicit applications from persons in the housing market area who are likely to apply for the housing without special outreach.

4. Records that will be kept describing actions taken by the City of Raleigh and by Borrower to affirmatively market units and records to assess the results of these actions; and

5. A description of how the City of Raleigh will annually asses the success of affirmative marketing actions and what corrective actions will be taken where affirmative marketing requirements are not met.

### Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

There was a total of \$517,261.94 in HOME Program Income expended in FY 2022-2023 on projects. Of this, \$132,863.12 was provided to 4 homebuyers for downpayment assistance (all 61%-80% AMI - 1 African American household, 2 White, one Asian). \$384, 398.82 was provided to 9 homeowners for home rehabilitation assistance (8 households between 31-50% AMI, 1 household below 30% AMI - all African American households).

## Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Local funds have been made available for nonprofit developers to help create or preserve affordable housing in Raleigh. The City seeks to work with developers of affordable housing to purchase existing affordable apartment developments (sometimes unsubsidized) threatened with redevelopment to other uses in Raleigh's more attractive locations. In June 2016, Raleigh City Council approved a one-cent tax increase for affordable housing, which generated nearly \$8 million in available funds for FY 2023-2024. In November 2020, Raleigh voters approved an Affordable Housing bond of \$80 million with 72% of voters in approval. The one-cent tax increase and affordable housing bond are major sources of local dollars with which the City can aggressively address its need for additional affordable units as well as preserve existing units into the future.

The City commited \$21,803,000 in local and federal funds to construct 725 rental units in FY 23-24, both records for the City. The City is working with the Raleigh Area Land Trust (RALT) on its first development in Raleigh utilizing the land trust model. \$2,582,000 in land and gap financing from the City will help RALT provide permanently affordable units for homeownership.

The City has increased its commitment to proactively purchase and or provide funding for rehabilitation to preserve existing affordable housing to counter significant market pressures on housing costs. The City recognizes preservation of existing units is often a more effective method of keeping low-income tenants stably housed while reducing the high costs of constructing new units.