

# City of Wilmington

## FY 2025-26 Annual Action Plan

for

## CDBG and HOME Funds

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### City of Wilmington

### **City Council**

Bill Saffo, Mayor

Clifford D. Barnett Sr., Mayor Pro-Tem

Salette Andrews

Charlie Rivenbark

Kevin Spears

David Joyner

Luke Waddell

Becky Hawke, City Manager Thom Moton, Jr., Deputy City Manager

### **Housing & Neighborhood Services Department**

### **Community Development and Housing**

Rachel Schuler, Housing & Neighborhood Services Director

Holly Bruhn, Loan and Entitlement Grants Manager Tammy Cain, Healthy Homes Administrative Support Specialist Gilbert Combs, Community Development & Housing Manager Mike Ferraro, Housing Rehab Technician Todd Fiskin, Facilities Project Coordinator, Housing R.B. Gardner, Healthy Homes Project Manager Chianti Johnson, Community Development Analyst, Compliance Abby King, Administrative Support Specialist Kendalyn Kufner, Healthy Homes Rehab Technician Joe Marmet, Accounting Specialist Brittany Redd, Administrative Support Specialist Tanita Wallace, Senior Community Development Analyst, Housing

City of Wilmington Housing & Neighborhood Services/Community Development 929 North Front Street P.O. Box 1810 Wilmington, NC 28402-1810 910-341-7836 City of Wilmington - Draft Annual Action Plan

## ACRONYM BANK

AMI	Area Median Income				
CDBG	Community Development Block Grant				
CES	Coordinated Entry System				
CFHCoC	Cape Fear Homeless Continuum of Care				
CoC	Continuum of Care				
CFR	Code Of Federal Regulations				
CHDO	Community Housing Development Organization				
Consolidated Plan	Five-Year Consolidated Plan				
DPA	Downpayment Assistance				
ESG	Emergency Solutions Grant				
HMIS	Homeless Management Information System				
HOME	Home Investment Partnerships Program				
НОР	Home Ownership Pool				
HUD	U.S. Department of Housing and Urban Development				
NIMBY	Not In My Back Yard				
OOR	Owner-Occupied Rehabilitation				
PHA	Public Housing Authority				
R/ECAP	Racially or Ethnically Concentrated Areas of Poverty				
RRIL	Rental Rehabilitation Incentive Loan				
WHA	Wilmington Housing Authority				

### **Executive Summary**

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

The City of Wilmington has been a Community Development Block Grant (CDBG) entitlement community since 1975. Funding comes to the City of Wilmington Housing & Neighborhood Services Department through an annual grant administered by the United States Department of Housing & Urban Development (HUD). CDBG funds can be used with great flexibility to provide "decent housing, a suitable living environment, and expand economic opportunities principally for persons of low and moderate income." In addition to CDBG funds, the city receives HOME Investment Partnerships Program (HOME) funds, also through HUD. The HOME grant is specifically for affordable housing.

The City of Wilmington Annual Action Plan is based upon the 2023-2027 Five-Year Consolidated Plan (Consolidated Plan) which identifies an entitlement community's priority housing and community development needs for very low-, low-, and moderate-income residents and neighborhoods within the City of Wilmington. The Consolidated Plan established goals to address annual priority needs.

The Annual Action Plan serves as an application for funding from HUD for the CDBG and HOME programs. Additionally, the Annual Action Plan identifies local contributions from general fund dollars, program income, and other funds that are used to implement the goals and activities described in the plan.

On May 14, 2025, HUD posted the allocation for federal fiscal year 2025 CDBG and HOME awards. The Annual Action Plan for the fourth year of the Consolidated Plan allocates \$871,503 in CDBG and \$575,573.42 in HOME, representing a 2.6% reduction in CDBG and an increase of 1.1% in HOME over the prior year. In addition, the plan identifies prior year funds of \$713,258.84 in CDBG and \$222,000 in HOME that are allocated to program activities in progress as of May 2025. Additionally, the plan recognizes available Program Income and Revolving Loan repayments of \$1,004,638.45 including General Funds, and \$9,822,652 of loans in the pipeline (estimated future expenditures) as of May 19, 2025. Finally, the plan includes \$793,763 in General Funds allocated for human service grant opportunities and Continuum of Care support.

The Annual Action Plan identifies goals to address the lack of affordable housing stock and the opportunity for low-to-moderate income people to access housing and other opportunities. The plan continues to focus on existing homeownership mortgage programs such as the Home Ownership Pool (HOP), the Owner-occupied Housing Rehabilitation Loan (OOR), and the Rental Rehabilitation Incentive Loan (RRIL). The local contribution helps to leverage other funds to

produce new housing units by providing gap financing. Goals identified in the Consolidated Plan supported the introduction of the Housing Counseling Program in 2023 allowing the city to better serve low-to-moderate income households in managing an ever-challenging housing market.

The Annual Action Plan establishes a coordinated approach for community development, identifies key stakeholders and partners, and ensures efficient and responsible delivery of programs and services for low-to-moderate income residents and neighborhoods. Collaboration in plan creation and active implementation are essential to the Annual Action Plan.

This plan is written in accordance with the HUD provided template from the Integrated Data Information System (IDIS). This is the fourth year of the Consolidated Plan and includes a needs assessment, a market analysis, and goal setting for the five-year period.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Housing affordability across the Cape Fear region is worsening at all income levels with the burden placed on homeowners escalating with low-to-moderate income renters and owners increasingly at risk of losing the stability that is provided by sufficient and consistent shelter.

Median rents and mortgages in Wilmington, New Hanover County, and the state saw steady increases between 2019 and 2023. Median rent increased by a yearly average of 7.12%, 6.87%, and 6.43% respectively. Median mortgage amounts increased by a yearly average of 5.26%, 4.01%, and 4.42%. The overall median dollar amount in rent increases were 31.36%, 30.26%, and 28.11%. For mortgages, the median dollar amount increased were 22.72%, 16.89%, and 18.8%.

According to the American Community Survey (ACS), housing cost burden has decreased. Further analysis shows why overall, renters and homeowners appear less burdened. From 2019 to 2023, the number of households in Wilmington, New Hanover County, and the state that earned \$100,000 or more increased by 46.9%, 43.0%, and 43.2%, respectively. Households that earned 0 to \$99,999 **decreased** in Wilmington by 12.8%, New Hanover County by 14.4%, and the state by 13.1%. Wilmington and New Hanover County's residential composition is becoming wealthier, therefore creating a false representation of burden for households earning near the 2025 median area income of \$110,900 or lower.

The desired outcomes from the implementation of the goals formulated to address the needs identified in this plan focus on supporting access to opportunity; increasing the supply of decent, safe, affordable housing; and promoting a suitable living environment as found in the Consolidated Plan.

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Between 2016 and 2025 the City's community development and housing programs have accomplished the following:

- Increase and Maintain Rental Housing 494 units
- Homebuyer Assistance: HOP and Downpayment Assistance 155 households/units
- Homeownership Housing Production for very low & low income 26 units
- Owner-Occupied Housing Rehabilitation/Repair 74 households/units
- Emergency Shelter & Services –18,114 individuals
- Homeless to Permanent Housing 1,462
- Produce Permanent Supportive Housing 91 units
- Homeownership Education –1,676 individuals
- Housing Counseling One-On-One (begin 2023) –263
- Preserve & maintain public facilities 11 projects completed
- Promote workforce development through education, training, job placement -11,675 individuals (CDBG, General Funds)
- Support quality youth programs for at-risk youth –36,581 youth served (General Funds)
- Support programs assist victims of crime, and provide crime prevention, community safety education and outreach 3,853 (General Funds)
- Provide for food security & fulfill basic needs for low income HH estimate 16,260 (General Funds); 295,958 pounds of food distributed

The City's federal funds are invested in benefiting low-income households and produce and maintain housing for owners and renters. Although the City works to leverage funds and generate program income where appropriate, these are not enough funds to make an impact on the growing housing needs in the City, as indicated by the increasing number of households experiencing cost burden and other housing problems.

The City's leadership recognizes the need for housing that is affordable to working families and provides additional general funds to support the City's homeownership and housing rehabilitation loan programs as well as gap financing.

### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

This citizen participation process and consultation process builds on the City's on-going participation and collaboration with community-based organizations and City appointed volunteers serving on advisory committees, such as the Community Relations Advisory Committee and the Workforce Housing Advisory Committee. City staff met with various organizations during scheduled meetings, consulted directly with stakeholders, and reviewed plans. In addition, a survey was posted on the City's website, and notification was made via email to community partners and with a press release to local media

### 5. Summary of public comments

*This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.* 

1	Encourages use of MIT's Living Wage Calculator.
	"The housing needs to be what they can afford not what the industry creating. Below
	are the estimated costs for families, based on the best research. I look forward to the
	Council devising appropriate goals using research-based numbers to have informed
	discussions that solve the City's and County's needs."
2	Purchasing a home is difficult enough but non-refundable due diligence money is a
	barrier for buyers and could easily result in fund depletion preventing entrance into
	the housing market. Port City Daily in 2024 reported NHC ranked the fourth most
	difficult county nationwide to buy a home. Non-refundable due diligence is a barrier
	and should only be allowed perhaps for homes at or above \$1,000,000.
3	Additional green spaces accessible to everyone are encouraged.
	"Crean success have as many han of its including positive impact on hoth why sight and
	"Green spaces have so many benefits, including positive impact on both physical and
	mental health within a community."

### 6. Summary of comments or views not accepted and the reasons for not accepting them

One of four public comments was not accepted due to the considerations being outside of the scope of the survey and the department.

### 7. Summary

Purchasing a home in Wilmington, NC is challenging. There are numerous barriers to entry and support for housing affordability is recommended. Additional green spaces that are publicly available are important for general physical and mental health.

### PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Wilmington	Housing & Neighborhood Services / Community Development & Housing
HOME Administrator	Wilmington	Housing & Neighborhood Services / Community Development & Housing

Table 1 – Responsible Agencies

### Narrative (optional)

This document is the Annual Action Plan for the City of Wilmington, NC, a participating jurisdiction in the U.S. Department of Housing and Urban Development (HUD), CDBG and HOME Investment Partnership Program (HOME). This plan covers the federal program year.

Community Development & Housing is a division of the Housing & Neighborhood Services Department. It is the unit of city government that acts as the primary administrator of federal CDBG and HOME funds.

### **Consolidated Plan Public Contact Information**

City of Wilmington, North Carolina Housing & Neighborhood Services Department Community Development & Housing 929 North Front Street PO Box 1810 Wilmington, NC 28402 910.341.5809 gilbert.combs@wilmingtonnc.gov www.wilmingtonnc.gov

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### AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

### 1. Introduction

The City of Wilmington staff collaborate closely with residents, community-based organizations including non-profits, religious institutions, public institutions, and private sector entities to continuously assess issues as they arise. The City's Community Development and Housing program staff have direct engagement with applicants and others seeking assistance with homebuying, housing repair, lead-based paint remediation, and rental housing development. In addition, staff attend community events like health fairs, housing fairs, and community festivals to engage with members of the public in low-to-moderate income neighborhoods. Lastly, City Community Development and Housing staff collaborate with agencies to facilitate the implementation of community development activities, solicit input, and consult on community development and housing initiatives. This plan showcases these relationships and builds on the interactions by including a list of consultations, attended input meetings, and guidance from various stakeholders.

# Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

A variety of engagement strategies enhance the coordination between public and assisted housing providers, private and governmental health, mental health, and other services agencies. These actions include but are not limited to initiating and participating in coalitions and partnerships that bring public and private entity representatives together to address housing, community development, youth development, community safety, physical and mental health, and other related issues. For example, City staff participate in the Joint City/County Workforce Housing Advisory Committee, the Cape Fear Housing Coalition, and the Cape Fear Homeless Continuum of Care (CFHCoC).

# Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Wilmington supports administrative staff at the CFHCoC with general funds through an interlocal agreement with the Cape Fear Council of Governments. The City's CDBG Public Services funds are allocated for homeless service and shelter programs. City staff serve as representatives of the CFHCoC and the CoC Board of Directors. Additionally, City staff participate in the Ranking Committee, which is responsible for reviewing, scoring, and making recommendations for projects to be included in the COC application for funding. Members of the CFHCoC are consulted throughout the year for input in the City of Wilmington's community

development planning efforts including, but not limited to, the Consolidated Plan and the Annual Action Plan.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate Emergency Solutions Grant funds, develop performance standards for and evaluate outcomes of projects and activities assisted by Emergency Solutions Grant funds, and develop funding, policies and procedures for the operation and administration of Homeless Management Information System

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

The City of Wilmington provides general funds to support the administrative staff of the CFHCoC through an inter-local agreement with the Cape Fear Council of Governments. The City's CDBG Public Services funds are allocated for homeless service and shelter programs. Additionally, City staff representatives serve on the CFHCoC and the CoC board. City staff participate in various committees of the CFHCoC including the Ranking Committee, which reviews, scores, and makes recommendations for projects to be included in the CoC application for funding. Members of the CFHCoC are consulted throughout the year for input in the City's community development planning including, but not limited to, Consolidated Planning and Annual Action Plans.

Agency / Group	Agency / Group /	What section of the Plan was addressed by	Briefly describe how the Agency / Group /			
/ Organization	Organization Type	Consultation?	Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?			
Ability Gardens	Services-Children Services-Persons with Disabilities	Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey			
Cape Fear Homeless Continuum of Care	Services-homeless Regional organization	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy	Meetings with CFHCoC Board; Attendance at monthly CFHCoC meetings; City RFP Process; Meetings with CFHCoC staff members; survey			
Cape Fear Community Land Trust	Housing Services - Housing	Housing Need Assessment HOPWA Strategy Economic Development Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey			
Cape Fear Housing Coalition	Housing Regional organization	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy	Attendance at Monthly meetings; legislative overview & Update; Participation in City/County Affordable/Workforce Housing Committee; survey			

	Housing Need Assessment	Submission of application for funding; one-on-one	
	Economic Development	interview; survey	
	Anti-poverty Strategy		
Services-Children	Housing Need Assessment	Survey	
Services-Persons with	Homelessness Strategy		
Disabilities	Anti-poverty Strategy		
Services-Persons with			
HIV/AIDS			
Services-Victims of			
Domestic Violence			
Services-homeless			
Services-Health			
Services-Children	Housing Need Assessment	Submission of application for funding; one-on-one	
Services-Education	Homelessness Needs - Unaccompanied youth	interview; survey	
	Homelessness Strategy		
	Anti-poverty Strategy		
Services-Children	Anti-poverty Strategy	Submission of application for funding; one-on-one	
Services-Education		interview; survey	
Services - Housing	Housing Need Assessment	Submission of application for funding; one-on-one	
Services-Persons with	Homelessness Strategy	interview; survey	
Disabilities	Anti-poverty Strategy		
Housing Need	Housing Need Assessment	Submission of application for funding; one-on-one	
Assessment	Homeless Needs - Families with children	interview; survey	
Homeless Needs -	Homelessness Strategy		
Families with children	Economic Development		
Homelessness Strategy	Anti-poverty Strategy		
Economic Development			
Anti-poverty Strategy			
-	Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Children Services-Education Services-Education Services-Education Services-Persons with Disabilities Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Economic Development	Anti-poverty StrategyServices-ChildrenHousing Need AssessmentServices-Persons withHomelessness StrategyDisabilitiesAnti-poverty StrategyServices-Persons withHIV/AIDSServices-Victims ofDomestic ViolenceServices-homelessServices-homelessServices-HealthHousing Need AssessmentServices-ChildrenHousing Need AssessmentServices-EducationHomelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty StrategyServices-ChildrenAnti-poverty StrategyServices-ChildrenAnti-poverty StrategyServices-ChildrenAnti-poverty StrategyServices-ChildrenAnti-poverty StrategyServices-ChildrenAnti-poverty StrategyServices-Persons withHomelessness StrategyJisabilitiesAnti-poverty StrategyHousing NeedHousing Need AssessmentAssessmentHomeless Needs - Families with childrenHomeless Needs -Homelessness StrategyFamilies with childrenHomelessness StrategyHomeless Needs -Economic DevelopmentHomelessness StrategyAnti-poverty Strategy	

DREAMS OF	Services-Children	Housing Need Assessment	Submission of application for funding; one-on-one
WILMINGTON,	Services-Education	Homelessness Strategy	interview; survey
INC		Anti-poverty Strategy	
First Fruit	Services-Persons with	Housing Need Assessment	Submission of application for funding; one-on-one
Ministries	Disabilities	Homeless Needs - Families with children	interview; survey
	Services-homeless	Homelessness Strategy	
		Anti-poverty Strategy	
FOOD BANK OF	Food Bank	Anti-poverty Strategy	Submission of application for funding; one-on-one
CENTRAL &			interview; survey
EASTERN NC			
Good Shepherd	Services-homeless	Housing Need Assessment	Submission of application for funding; one-on-one
Ministries of		Homeless Needs - Chronically homeless	interview; survey
Wilmington		Homeless Needs - Families with children	
		Homelessness Needs - Veterans	
		Homelessness Strategy	
		Economic Development	
		Anti-poverty Strategy	
Kids Making It	Services-Children	Economic Development	Submission of application for funding; one-on-one
	Services-Education	Anti-poverty Strategy	interview; survey
	Services-Employment		
LINC	Services - Housing	Housing Need Assessment	Survey; submission of application for funding; one-on-
	Re-Entry	Public Housing Needs	one interview
		Homelessness Strategy	
		Non-Homeless Special Needs	
		Economic Development	
		Anti-poverty Strategy	

New Hanover	Other government –	Housing Need Assessment	Participation in City/County Affordable/Workforce
County	County	Homelessness Strategy	Housing Committee; Meeting with NHC staff members
		Non-Homeless Special Needs	in Housing & Planning; Survey
		Economic Development	
		Anti-poverty Strategy	
StepUp	Services-homeless	Homelessness Strategy	Submission of application for funding; one-on-one
Wilmington	Services-Education	Economic Development	interview; survey
	Services-Employment	Anti-poverty Strategy	
UNCW	Services-Education	Housing Need Assessment	Survey; University Community Relations Association
		Homelessness Strategy	committee meetings
		Market Analysis	
		Economic Development	
		Anti-poverty Strategy	
Voyage	Services-Children	Housing Need Assessment	Survey; submission of application for funding; one-on-
	Services-Education	Economic Development	one interview
	Services-Employment	Anti-poverty Strategy	
Wilmington	Public Housing	Housing Need Assessment	Participation in City/County Affordable/Workforce
Housing	Authority	Public Housing Needs	Housing Committee; Meeting with WHA Staff & Board
Authority		Anti-poverty Strategy	Members; Survey
Wilmington	Housing	Housing Need Assessment	Survey
Regional Assoc		Market Analysis	
REALTORS		Economic Development	
Wilmington	Services-Children	Anti-poverty Strategy	Submission of application for funding; one-on-one
Residential	Services-Education		interview; survey
Adolescent			
Achievement			
Program			

Table 2 – Agencies, groups, organizations who participated

### **Identify any Agency Types not consulted and provide rationale for not consulting** Not applicable

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap
		with the goals of each plan?
Continuum of Care	Cape Fear Homeless Continuum of	Housing First; Permanent Supportive Housing;
	Care	Coordinated Entry; Homeless Prevention
Five Year Agency Plan	Wilmington Housing Authority	Publicly Assisted Housing Revitalization; Access to
		Affordable, Quality, Safe Housing
New Hanover County Comprehensive	New Hanover County	Coordinated Growth and Development regarding
Plan		land use, development, and capital improvements
City of Wilmington Comprehensive Plan	City of Wilmington	Coordinated Growth and Development regarding
		land use, development, and capital improvements
Analysis of Fair Housing - City of	City of Wilmington	Increase Opportunity and choice for protected
Wilmington/WHA		classes to access housing, jobs, education, and
		other services
New Hanover County/City of Wilmington	City of Wilmington/New Hanover	Identifying housing gaps by tenure and income to
Housing Need	County	effectively increase access to affordable housing.

Table 3 – Other local / regional / federal planning efforts

### Narrative (optional)

Coordination with neighboring local governments is ongoing. An example is the City of Wilmington and New Hanover County Workforce Housing Advisory Committee that makes recommendations for increasing housing that is affordable within the community. There is continuous consultation with the North Carolina Office of Resiliency and Recovery and the North Carolina Housing Finance Agency regarding affordable housing initiatives including hurricane recovery, COVID related housing assistance, multifamily development including permanent supportive housing, family and senior housing, and down payment assistance.

### AP-12 Participation - 91.105, 91.200(c)

# **1.** Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen participation efforts were focused on agencies that represent the public. Community Development and Housing staff attended meetings of the Joint City of Wilmington/New Hanover County Workforce Housing Advisory Committee's regularly scheduled monthly meetings. These committees are comprised of citizens appointed by the elected boards of the City and County to address issues of concern including Fair Housing and Workforce and Affordable Housing. Presentations and solicitations of input have taken place numerous times over the last two years of engagement with the committees, specifically in preparation for the Consolidated Plan and the Plan Year 2025 Annual Action Plan. Community Development and Housing staff also represent as a member of the Cape Fear Housing Coalition, an education and advocacy non-profit working to increase affordable housing and equitable access to housing in the Cape Fear region. In addition to meeting with citizens and stakeholders at regular scheduled meetings, a public meeting was held and advertised with press release and through email distribution lists.

A survey was distributed through press release, social media, and email distribution list. The survey was available from May 23, 2025, to June 8, 2025.

Please see attached for survey responses.

### **Citizen Participation Outreach**

Sort	Mode of	Target of	Summary of	Summary of	Summary of comments	URL (If applicable)
Order	Outreach	Outreach	response/attendance	Comments	not accepted	
				received	and reasons	
1	Public	Non-targeted/broad	City Council/General Public in-	No comments		www.wilmingtonnc.gov/d
	Hearing	community	person and via GTV	received		epartments/city-
			6/17/2025			manager/gtv8
2	Public	Housing Providers &	Appointed volunteers	Need for	All comments received	
	Meeting	Stakeholders	representing homeless	additional	and accepted	
			services, real estate	housing units		https://nhcgov.com/1106
			developers, government	across the		/Housing
			public housing, rental	spectrum.		
			residential management, etc.			
3	Public	Homeless Service	Homeless Point in Time Data	Need for	All comments received	https://capefearcog.org/h
	Meeting	Providers/Advocates	and other data regarding	homelessness	and accepted	omeless-
			status of homelessness	prevention as		services/homeless-data/
			5/6/2025	well as Rapid		
				Rehousing,		
				Permanent		
				Supportive		
				Housing, and		
				emergency		
				services.		
4	News Ad	Non-targeted/broad	Advertised in Star-News			
		community	5/25/2025			

Sort	Mode of	Target of	Summary of	Summary of	Summary of comments	URL (If applicable)
Order	Outreach	Outreach	response/attendance	Comments	not accepted	
				received	and reasons	
5	Internet	Non-targeted/broad	Email distribution list to 150+			Wilmingtonnc.gov
	Outreach	community	agencies and interested			
			parties, notice to social media			
		Housing Services	via City Corporate Affairs;			
		providers &	posted on city website			
		Advocates				

Table 4 – Citizen Participation Outreach

### **Expected Resources**

### AP-15 Expected Resources – 91.220(c)(1,2)

### Introduction

The City plan is based upon an assumption of the approximate levels of funding of CDBG and HOME and consistent General Funds over the five-year period covered by the Consolidated Plan. If resources change during this period, amendments will be submitted to adjust programs and funding as required. The expected resources also include anticipated program income which is subject to variances.

### **Anticipated Resources**

Program	n Source Uses of Fu	Uses of Funds	Ex	pected Amoui	nt Available Y	ear 4	Expected	Narrative Description
	of		Annual	Program	Prior Year	Total:	Amount	
	Funds		Allocation:	Income: \$	<b>Resources:</b>	\$	Available	
			\$		\$		Remainder	
							of ConPlan	
							\$	
CDBG	Public	Acquisition	871,503.00	489,674.71	713,258.84	2,074,436.55	4,148,872	Primarily directed to
	-	Admin and						HOP Homebuyer 2 <sup>nd</sup>
	Federal	Planning						Mortgage; Public
		Economic						Services @ 15% Cap
		Development						including Homeless
		Housing						Shelter & Services,
		Public						youth recreation
		Improvements						programs, and crime
		Public Services						prevention, public
								facilities

HOME	Public	Acquisition	575,573.42	284,820.73	829,180.15	1,689,574.30	3,379,148.60	Primarily directed to
	-	Homebuyer						Owner-occupied
	Federal	Assistance						Rehab; Housing
		Homeowner						Production CHDOs;
		Rehab						Permanent Supportive
		Multifamily Rental						Housing; Multi-family
		New Construction						Rental Gap Financing;
		Multifamily Rental						Rental Rehab Loan
		Rehab						
		New Construction						
		for ownership						
		TBRA						
General Fund	Public	Acquisition	2,365,361	230,143.01	594,032.99	3,189,537.00	6,379,074.00	Rehab Forgivable
	– Local	Admin and						Loans, HOP, Public
		Planning						Services, Housing
		Homebuyer						Repair, CFHCoC
		Assistance						Admin, Youth,
		Homeowner						Homeless, Food
		Rehab Housing						Access, Job Skills,
		Multifamily Rental						Literacy, Victim
		New Construction						Services, and Safe
		Multifamily Rental						Haven
		Rehab						
		New Construction						
		for Ownership						
		Public Services						
		Healthy Homes						
		Pilot Program						

Table 5 - Expected Resources – Priority Table

# Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will leverage additional local resources to support homeless shelter and services, youth programs, job skills and placement, elder care, etc. Wilmington City Council commits General Funds to support the aforementioned activities. Additionally, City Council appropriates General Funds to the Housing Loan Funds to provide Homebuyer Assistance through the City's HOP and OOR programs. Partner banks provide approximately \$1 million annually for homebuyer assistance through the HOP program. HOME funds leverage Low Income Housing Tax Credits, North Carolina Housing Finance Agency, and private funds for the development of multifamily housing including Permanent Supportive Housing.

# If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Wilmington is quickly building out and as a result has increasingly limited land for development. The City, at times, has surplus property and facilities that are no longer needed for operations. One example is the Carolina Beach Road Fire Station. City Council approved conveyance of this property to the Good Shepherd Center for the development of Permanent Supportive Housing. The development of the project is supported with HOME-American Rescue Plan funding.

A November 21, 2017, Resolution passed by City Council directs that any public/private development projects that include residential should include affordable housing, if possible. As City owned properties are evaluated for surplus, conveyance for affordable housing is a priority for City Council.

### Discussion

The anticipated resources are estimates based on current year program income and will be amended as needed.

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### Annual Goals and Objectives

AP-20 Annual Goals and Objectives Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographi c Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Options	2025	2026	Affordable Housing	Northside Southside Sunset/ Longleaf City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs Segregation R/ECAPs Public Supported Housing Fair Housing	CDBG: \$935,922.35 HOME: \$693,516.16 General Fund: \$765,413	Rental units constructed: 30 Homeowner Housing Added: 1 Homeowner Housing constructed: 10 Direct Financial Assistance to Homebuyers: 6
2	Support Public Services (Homeless Services & Shelter, Youth, Job Training, etc.)	2025	2026	Homeless Non- Homeless Special Needs Non-Housing Community Development	Northside Southside Sunset/ Longleaf City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs	CDBG: \$264,913 General Fund: \$793,763	Public service activities other than Low/Moderate Income Housing Benefit: 240 Homeless Person Overnight Shelter: 240
3	Maintain Existing Affordable Housing	2025	2026	Affordable Housing	City-wide	Disproportionate Housing Needs R/ECAPs Public Supported Housing Fair Housing	CDBG: \$525,00 HOME: 600,000	Homeowner Housing Rehabilitated: 10
4	Reduce Housing Discrimination	2025	2026	Fair Housing Education/ Outreach/ Enforcement	City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs R/ECAPs Public Supported Housing Fair Housing	-	Other: 1

5	Expand & Improve Access to Funding Sources for Affordable Housing Development	2025	2026	Affordable Housing	City-wide	Disproportionate Housing Needs R/ECAPs Public Supported Housing Fair Housing	General Fund: \$910,187	Gap Financing: 50
6	Increase Homeownership Opportunities	2025	2026	Affordable Housing	City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs	CDBG: \$174,300.60 HOME: 310,018.73	Direct Financial Assistance to Homebuyers: 10
7	Increase Housing Counseling and Financial Literacy Opportunities	2025	2026	Affordable Housing	City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs	-	Housing Counseling: 10 HBE One-one Sessions: 40 Clients Served
8	Improve Public Perception of Affordable Housing	2025	2026	Fair Housing Education/ Outreach/ Enforcement	Northside Southside Sunset/ Longleaf City-wide	Disparities in Access to Opportunity R/ECAPs Public Supported Housing Fair Housing	-	Other: 1

					CDBG: 174,300.60
					HOME:
					57,557.34
					HOME
0	Planning &	2025	2026	Planning &	Program
9	Administration	2025	2026	Administration	Income:
					28,482.07
					General Fund:
					720,174
					(includes one-
					time software
					funds)

### **Goal Descriptions**

Goal Name	Goal Description
Increase Affordable	Increase production of rental housing including Permanent Supportive Rental housing, and other rental housing
Housing Options	for elderly, victims of domestic violence, disabled, and others; locate newly constructed housing in areas of
	opportunity to increase choices for low-to-moderate income households; produce housing in R/ECAPs as part of
	a strategy to transform the areas to areas of opportunity; preserve affordable housing and prevent displacement
	due to economic pressures through rehabilitation of owner-occupied housing; provide homebuyer assistance;
	and work in partnership with private sector lenders, developers, real estate professionals and others to increase
	affordable housing options throughout the City.
Support Public Services	Support Homeless Shelter & Service providers providing low barrier, housing first shelter and services. Support
(Homeless shelter &	community-based programs and services to benefit low-to-moderate income individuals to access opportunity
services, Youth, Job skills,	by increasing skills and supporting youth development. Support efforts to improve disparity in R/ECAPS. Increase
etc.)	access to supportive services and programs by funding public service programs serving at-risk youth, elderly,
	disabled, homeless, and others. Programs include afterschool and summer programs, jobs skills and placement,
	and case management and supportive services. Work with community-based agencies to transform R/ECAPs and
	improve living conditions and access to opportunities for low-to-moderate income persons.
Maintain Existing	Rehabilitate and/or repair an average of 10 owner-occupied houses per year
Affordable Housing	
Reduce Housing	Conduct at least one workshop annually on fair housing for landlords, lenders, and housing managers to review
Discrimination	housing for persons disabilities and reasonable accommodations; collaborate with and support City/County
	Community Relations Advisory Committee in Fair Housing Education and Enforcement efforts.
Expand & Improve Access	Provide gap financing to leverage other financing and equity investments to produce new affordable housing for
to Funding Sources for	low- to moderate-income households, 50 units per year
Affordable Housing	
Development	

Goal Name	Goal Description
Increase Affordable	Increase production of rental housing including Permanent Supportive Rental housing, and other rental housing
Housing Options	for elderly, victims of domestic violence, disabled, and others; locate newly constructed housing in areas of
	opportunity to increase choices for low-to-moderate income households; produce housing in R/ECAPs as part of
	a strategy to transform the areas to areas of opportunity; preserve affordable housing and prevent displacement
	due to economic pressures through rehabilitation of owner-occupied housing; provide homebuyer assistance;
	and work in partnership with private sector lenders, developers, real estate professionals and others to increase
	affordable housing options throughout the City.
Increase Home Ownership	Partner with area banks to provide up to 6 mortgages annually, through the HOP program, to households at or
	below 80% AMI.
Increase Housing	Provide group and one-one housing counseling sessions for individuals seeking pre-purchase, post-purchase,
<b>Counseling and Financial</b>	delinquent housing counseling for 40 clients annually
Literacy Opportunities	
Perception of Affordable	Increase Affordable Housing Marketing, Awareness and Education throughout the community. Partner with Cape
Housing	Fear Housing Coalition on events such as annual legislative breakfast and solution series. Attend various
	community events and meet with civic groups and others to dispel myths about affordable housing and address
	NIMBY.

### Projects

### AP-35 Projects - 91.220(d)

### Introduction

Annual Action Plans are required each year for the Consolidated Plan. The Annual Action Plan implements the strategies in the Consolidated Plan and addresses the needs for housing, public services, public facility, and other community development needs identified in the Consolidated Plan. The Annual Action Plan identifies the projects and programs/activities for which funds are recommended. And describes the process for accepting applications and proposals for funding. This Action Plan covers the July 1, 2025, through June 30, 2026. This is the fourth year of the City of Wilmington's 2022-2026 Consolidated Plan based on HUD plan year.

The Annual Action Plan describes the projects and programs/activities that are recommended for CDBG, CDBG-Cares Act, HOME and General Funds appropriated for the FY2025-26 budget year. The Annual Plan also describes projects and programs/activities that are underway and have prior year funds are available to continue the program or complete the activity. CDBG and HOME funding have timeliness requirements but are allocated to projects that carry over into multiple years. Also, the City has used federal funds to leverage other public and private financing for large scale development projects, such as Low-Income Housing Tax Credit, that take several years to complete. Finally, the City's OOR and HOP programs accept applications on an on-going basis and loans may originate in one program year and close in another.

In FY26, the City is budgeting CDBG and HOME funds as allocated by HUD per May 14, 2025, HUD announcement and posting on the HUD Exchange. The Annual Action Plan includes a budget of \$871,503.00 CDBG and \$575,573.42 HOME, plus CDBG related program income of \$489,674.71 and \$284,820.73 in HOME. Prior year funds and Revolving Loan Funds are also available to complete projects or towards on-going programs/activities. There were also \$9,822,652 in loans pending closing and in process.

FY26 Funds will be used for the Owner-Occupied Housing Rehabilitation (OOR) Loan Program, Rental Rehabilitation Incentive Loan Program and HOP, \$86,336.01 is set aside for Community Housing Development Organizations (CHDO). Additional projects will be recommended for funding as proposals are submitted through the City's Housing Production Application process.

A detailed description of projects and programs/activities follows herein.

Projects

#	Project Name						
1	Planning and Administration						
2	Housing						
3	Public Services						

Table 7 - Project Information

# Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Allocation priorities reflect an alignment with the City's Strategic Plan Focus Areas and priorities. They also reflect CDBG and HOME objectives and restrictions, and the resources, opportunities for leverage, and analysis of community needs and markets.

Obstacles to addressing underserved needs include, but are not limited to, a lack of resources, historic patterns of concentrated poverty, inequitable access to proficient education, jobs, services, and amenities.

### **AP-38 Project Summary**

### **Project Summary Information**

Project Name	Target	Goals	Needs	Funding	Description	Target	Estimate	Location	Planned
	Area	Supported	Addressed			Date	the number	Description	Activities
							and type of		
							families		
							that will		
							benefit		
							from the		
							proposed		
							activities		
Planning and	Northside	Increase	Disparities in	General	Planning and	6/30/2026	n/a		Planning &
Administration		Affordable	Access to	Funds:	Administration				Administration
	Southside	Housing	Opportunity	\$720,174	for CDBG and				
		Options			HOME				
	City-wide		Disproportionate	CDBG:					
		Support	Housing Needs	\$174,300.60					
	Sunset/	Public							
	Woodlawn/	Service	R/ECAPs	HOME					
	Longleaf	Programs		Program					
			Public Supported	Income:					
		Expand	Housing	\$28,482.07					
		Funding							
		Sources	Fair Housing	HOME:					
				\$57,557.34					
		Affordable							
		Housing							
		Development							

Housing	Northside	Increase	Disparities in	General Fund:	CHDO set-	6/30/2026	Over 1,200	Rehabilitation
		Affordable	Access to	\$1,675,600	aside		individuals	projects for
	Southside	Housing	Opportunity		Homebuyer		of families	single family
		Options		CDBG:	Assistance -		of low-to-	<b>o</b> ,
	City-wide		Disproportionate	\$1,635,222.95	НОР		moderate	<ul> <li>CHDO Projects</li> </ul>
		Support	Housing Needs		Downpayment		income will	<ul> <li>HOP Loans</li> </ul>
	Sunset/	Public	R/ECAPs	HOME:	Assistance;		benefit	• Owner-
	Woodlawn/	Service	Public Supported	\$910,018.73	Owner-		from the	Occupied
	Longleaf	Programs	Housing		Occupied		projects	Rehab Loans
			Fair Housing	HOME CHDO:	Rehab			
		Expand		\$693,516.16	Rental Rehab			<ul> <li>Downpayment</li> </ul>
		Funding			Housing			Assistance
		Sources			Production –			<ul> <li>Housing</li> </ul>
					Single-family/			Production
		Affordable			Multifamily			- Dontol Dohoh
		Housing			Rental			Rental Rehab
		Develop						Incentive
								Loans

Public Services	Northside	Support	Disparities in	General	After School &	6/29/2026	Programs	CDBG:
		Public	Access to	Funds:	Summer Youth		supported	
	Southside	Service	Opportunity	\$793,763	Programs; Job		through	Homeless
		Programs		CDBG:	Skills &		CDBG and	Shelter and
	City-wide			\$264,913	Training, Job		General	Services
					Placement,		Funds will	Crime
	Sunset/				Elder		serve at	Prevention
	Woodlawn/				Programs; Re-		least 2000	General Fund:
	Longleaf				Entry;		low-to-	
					Homeless		moderate	Human Services
					Shelter &		income	Grant
					Services;		youth,	
					Enhanced		elderly,	
					Homeless		homeless	
					Street		persons,	
					Outreach;		and other	
					Crime		special	
					Prevention;		populations.	
					Literacy;		Funding will	
					Foodbanks		also support	
					and Meals		the CFHCoC	

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#### AP-50 Geographic Distribution – 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Assistance will be directed at the Northside and Southside areas identified in the Assessment of Fair Housing as R/ECAPs as well as in the areas of opportunity throughout the City to help ensure a balanced approach in the efforts to Affirmatively Further Fair Housing by increasing access to opportunity.

#### **Geographic Distribution**

Target Area	Percentage of Funds
Northside	25
Southside	25
City-wide	25
Sunset/Woodlawn/Longleaf	25

**Table 8 - Geographic Distribution** 

#### Rationale for the priorities for allocating investments geographically

The Northside, Southside, and Sunset/Longleaf R/ECAPs need investment to aid the revitalization and preserve affordable housing and provide low-to-moderate income residents, especially youth, disabled, elderly and homeless in these communities with more opportunities to access jobs, education, transportation, and housing. In addition, renters and homebuyers are seeking to reside in areas within the city that provide access to good jobs, schools, and services. Therefore, the allocation of investments represents a balanced approach to reinvestment and revitalization and equitable access to opportunity.

#### Discussion

The City of Wilmington does not have a Neighborhood Revitalization Strategy Area currently. The previous Neighborhood Revitalization Strategy Area was the area known as the Northside. Additionally, the city does not have redevelopment areas or target areas selected for CDBG or HOME funds investment. That said, the City identified three R/ECAPs using the Assessment of Fair Housing Mapping Tool. The City's goals and strategies identified in the current Consolidated Plan offer a balanced approach to increase choices for low-to-moderate income persons to access high opportunity neighborhoods and to invest resources in revitalization of R/ECAPs to increase opportunities for safe, decent, affordable housing, youth services, jobs, services and amenities.

## Affordable Housing AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Wilmington's affordable housing goals direct resources to City implemented rehabilitation and homebuyer assistance loan programs, and partnerships with affordable housing developers including CHDOs to support the production and rehabilitation of affordable housing, including permanent supportive housing. In addition, the City continues to support the Continuum of Care and emergency shelters. Housing that is affordable is not readily available within the City; the private housing market does not meet the demand for affordable housing.

One Year Goals for the Number	of Households to be
Supported	
Homeless	600
Non-Homeless	600
Special-Needs	45
Total	1,245

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of	Households Supported
Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	10
Acquisition of Existing Units	12
Total	23

 Table 10 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The goal for Homeless households supported reflects the number of persons (600) accessing services, shelter and transitional housing as submitted by homeless services and shelter providers. The City allocates CDBG funding to support homeless shelter and service providers to provide emergency shelter, case management and other services to assist people experiencing homelessness transition into housing.

Non-homeless households to be supported include those households that will receive homebuyer assistance including down payment assistance to purchase homes produced with HOME funds or units in the private market. Interest in the OOR Program is strong, thus far in

FY2025 there are more applicants than contractors available to rehabilitate the homes. There is continued interest in the RRIL program, however, finding suitable properties to acquire and rehabilitate to affordable rental is becoming more difficult in the very competitive housing market in Wilmington.

The City does not provide direct Tenant Based Rental Assistance to individuals; however, the City does support the production of multi-family and scattered site rental units. The goal for acquisition of existing units is 10, this reflects the acquisition of housing by homebuyers receiving homebuyer assistance, including Down Payment Assistance and vacant homes for rehabilitation and rental. CDBG or HOME funds may be used for the acquisition of existing units for rehabilitation for either ownership or rental.

#### AP-60 Public Housing – 91.220(h)

#### Introduction

The Housing Authority of the City of Wilmington, North Carolina (WHA) manages Public Housing, Housing Choice Vouchers, and other properties for lower income households. The City works closely with WHA and has provided CDBG and HOME funds for several multi-family rental projects.

#### Actions planned during the next year to address the needs to public housing

- Mold Remediation & Relocation Update: As of March 31, 2023, all families displaced by mold have been returned to safe housing. WHA staff coordinated logistics, including access to furniture and household essentials, with support from community partners such as the New Hanover Community Endowment and Catholic Charities.
- Redevelopment & Rehabilitation Commitments: WHA continues to prioritize major redevelopment and rehabilitation projects, maintaining key principles:
  - One-for-one replacement of units
  - "Build first" strategy when feasible
  - Right to return to appropriately sized units
  - o Limited displacement through Rental Assistance Demonstration
- Key Projects:
  - Hillcrest Redevelopment: 84 units | \$26M | Tax credit application submitted.
  - Houston Moore Redevelopment: 200 units | \$65.4M | Partnering with Lincoln Avenue Capital and Georgetown Development.
  - Solomon Towers Modernization: 151 units | \$30.3M | In partnership with Silverstreet and Ulysses Development.
  - Jervay Place: 82 units | \$1.7M acquisition | \$8.5M rehab addressing hurricane damage and deferred maintenance.
  - Creekwood, New Brooklyn Homes, Robert Taylor Homes & The Pointe: Targeted improvements, turnover acceleration, and resident engagement.
- Resident & Staff Support:
  - Maintenance and property management staff receive training in asset management, compliance, and mold prevention.
  - WHA maintains strong training partnerships with Cape Fear Community College, National Association of Housing and Redevelopment Officials, Public Housing Authorities Directors Association, and Housing Authority Insurance Group.
  - Pre-occupancy housekeeping training has been reinstated to reduce mold risk and educate tenants on maintenance responsibilities.
  - WHA has enhanced its Section 3 Resident Hiring Program to increase job opportunities for public housing residents.

- Digital Access & Community Engagement:
  - WHA launched a new, accessible website with up-to-date news, meeting minutes, and community resources.
  - The agency continues to uphold its "3 C's" service standard: *Courteous, Complete, and Clean.*
- Ongoing Development Partnerships: WHA is proactively engaging with developers and potential funding partners to expand its affordable housing inventory throughout Wilmington and New Hanover County.

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

- WHA supports Resident Organizations and has established RAB Boards at all sites as of March 2025. These boards help shape policy and provide resident feedback, including on the WHA Annual Plan.
- Residents can access self-sufficiency programs such as Family Self-Sufficiency, Resident Opportunity and Self-Sufficiency, Jobs Plus, and services supported by the Multifamily Elderly Services Grant.
- WHA's HOUSING CHOICE VOUCHER program continues proactive landlord outreach and has raised payment standards to 120% of HUD's Fair Market Rent to increase housing options and voucher usability.

# If the Public Housing Authority is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

- In August of 2024 WHA, North Carolina was designated as a "troubled" housing authority by HUD. In response, WHA partnered with HUD to implement a robust restructuring plan focused on:
  - Organizational leadership changes
  - Updated financial management practices
  - Enhanced service delivery protocols
  - Streamlined budgeting, accounting, and reporting aligned with HUD standards

From April 1, 2022, to March 31, 2023, WHA invested over **\$3.6 million** in mold remediation and unit repairs, primarily funded by 2022 Capital Funds and Operating Subsidies. Despite multiple emergency funding requests, HUD support was not granted. These financial strains limited full operational capacity, and WHA continues to recover from this period by increasing revenue streams and fiscal discipline. WHA has worked diligently to correct any internal deficiencies and is hopeful to correct this designation in 2025.

#### Discussion

- WHA has rebuilt the Executive Department and continues to update and streamline processes intended to achieve efficiency and provide excellent customer service.
- WHA staff continue to be trained to recognize mold and take the appropriate next steps. WHA has reinstated pre-occupancy housekeeping training to help residents understand their role in avoiding conditions under their control that are conducive to mold growth, and the importance of reporting suspected mold in their units. This information has also been offered to existing residents.
- WHA remains steadfast in its mission to deliver safe, high-quality, and affordable housing. Thanks to continued support from partners, residents, and stakeholders, WHA is advancing its long-term goals of equitable housing access, financial resilience, and community uplift.

#### Future Vision & Community Impact:

WHA's forward-looking vision centers on:

- Sustainable housing: Energy-efficient developments
- Community-first mindset: Safe, well-maintained, resident-centered communities
- Economic development: Job creation and supportive services

WHA strives to position itself as a **premier affordable housing provider** in Southeastern North Carolina.

Provided by WHA

#### AP-65 Homeless and Other Special Needs Activities – 91.220(i)

#### Introduction

The City of Wilmington provides CDBG and General Funds to support the operations and service delivery of several local homeless service providers, including Good Shepherd Center, Family Promise, First Fruit Ministries, Domestic Violence Shelter and Services, Leading Into New Communities (LINC), Open House Youth Shelter, and the CFHCoC.

The CFHCoC is the HUD-designated Continuum of Care for the Cape Fear Region. It is a collaborative alliance of service providers, local government agencies, and community stakeholders working collectively to make homelessness rare, brief, and non-recurring in the region. The Cape Fear Council of Governments serves as the CoC Lead Agency, providing administrative leadership and coordination for the CoC.

In addition to its role as the CoC Lead, the Cape Fear Council of Governments also serves as the lead agency for the Homeless Management Information System (HMIS) and the Coordinated Entry System (CES).

- HMIS is the regional data system used to collect client-level information on the provision of housing and supportive services to individuals and families experiencing or at risk of homelessness.
- The CES is a federally required, coordinated, community-wide system that ensures standardized intake, assessment, and referral processes. The CES is designed to ensure equitable access to housing and services and to prioritize assistance for the most vulnerable households based on need and available resources.

The CoC Lead Agency facilitates regular meetings of the full CFHCoC membership and its subcommittees; manages the local application processes for both the HUD CoC Program Competition and North Carolina Emergency Solutions Grant (ESG); and oversees a range of state and federal reporting requirements including the Longitudinal System Analysis, Housing Inventory Count, Emergency Solutions Grant CAPER, and System Performance Measures. The COG also coordinates the annual Point-in-Time Count, conducts service gap analyses, fosters collaboration between traditional and non-traditional providers, monitors grant recipients for performance and compliance, and represents the continuum at regional, state, and national trainings and conferences on housing and homelessness.

City of Wilmington staff actively participate in the CFHCoC through monthly general membership meetings and bi-monthly Continuum of Care Board meetings. The City remains committed to these collaborative efforts. Over the next program year, the City's goals and resource allocations will continue to reflect this commitment to addressing homelessness

through coordinated, data-driven, and community-centered strategies.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

#### Goals:

- Enhance proactive, trauma-informed outreach to individuals experiencing unsheltered homelessness.
- Enhance the assessment and prioritization of individuals' needs through Coordinated Entry.

#### Context and Challenges:

The jurisdiction continues to face significant challenges in addressing unsheltered homelessness, including a limited number of available shelter beds, low rental vacancy rates, and rapidly increasing housing costs. Despite these barriers, the CFHCoC remains committed to strengthening its system of care through collaboration and innovation.

The CoC convenes multiple committees that directly inform and enhance services for the unsheltered population. These include, but are not limited to, the Creative Solutions Workgroup, the Coordinated Entry Committee, the Point-In-Time Count Committee, and the Veterans Strategy Committee.

#### **Outreach Programs and Coordination:**

A variety of community programs, supported by diverse funding sources, conduct street outreach to individuals experiencing unsheltered homelessness. These programs assess individual needs and facilitate access to services and resources. Key programs include:

- Getting Home Program (City of Wilmington and New Hanover County)
- Block by Block (Wilmington Downtown, Inc.)
- First Fruit Ministries
- Coastal Horizons Center

Programs funded through the **Projects for Assistance in Transition from Homelessness** grant include:

- Coastal Horizons Center
- Asheville Buncombe Community Christian Ministry, which operates a veteran-specific outreach program

Additionally, Coastal Horizons Center operates a youth-specific street outreach initiative. To

improve the impact of these efforts, the jurisdiction aims to enhance coordination among outreach teams to:

- Maximize geographic coverage
- Reduce duplication of services
- Broaden the scope of services offered

Geographic Information System mapping from the annual Point-In-Time count will be used to identify areas with high concentrations of unsheltered individuals, enabling more strategic deployment of outreach resources.

#### Support Services and Day Shelters:

Day shelters operated by Living Hope, First Fruit Ministries, and Good Shepherd Center provide critical daytime services, including meals, resource navigation, and storage of personal belongings. Recent expansion of operating days/ times has increased accessibility for unsheltered individuals.

#### Mobile Outreach:

Mobile units operated by Living Hope and Vigilant Hope provide showers and resource access across multiple sites, supporting both unsheltered and marginally housed populations. Efforts are ongoing to expand their reach and impact within the community.

#### Assessment and Coordinated Entry:

All individuals engaged through outreach—either directly or via community partners such as the Christian Homeschool Center, Good Shepherd Center, New Hanover Regional Medical Center, SOAR Disability Advocates, and The Salvation Army—are connected to the CES. The Coordinated Entry System ensures individuals are assessed using a standardized vulnerability index, referred to service providers, and prioritized for housing placements based on need, in alignment with HUD regulations and the Fair Housing Act.

#### Integrated Service Approach:

Community partners work collaboratively to facilitate access to emergency shelter and transitional housing as available. This includes coordinated efforts to support housing readiness by assisting individuals with obtaining necessary documentation and benefits, increasing their chances for long-term housing stability. Partnerships with healthcare providers will continue to be strengthened, particularly for individuals facing mental health or substance use challenges.

#### **Evaluation and Data-Driven Strategies:**

All outreach and housing placement outcomes are tracked through the HMIS. This data is shared with stakeholders to evaluate program effectiveness, identify gaps, and refine strategies to better serve individuals experiencing homelessness.

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

Over the next program year, the City of Wilmington will continue to partner with the CFHCoC and local service providers to address the evolving emergency shelter and transitional housing needs of individuals and families experiencing homelessness.

#### **Emergency Shelter:**

As local shelters have adopted a Housing First approach and lowered entry barriers, demand for emergency shelter services has increased significantly. However, this rise in utilization has occurred alongside a reduction in shelter capacity, stemming from the long-term impacts of Hurricane Florence in 2018 and the COVID-19 pandemic. Temporary programs—such as the non-congregate shelter initiative supported through a City/CoC partnership during the height of the pandemic—have been phased out, putting additional strain on the existing shelter system.

Further compounding this issue is the temporary closure of the Salvation Army facility, one of the region's largest emergency shelters, which has substantially reduced available bed space. This shelter is set to come back online this year, which should alleviate some of the current strain. The CoC continues to administer Emergency Solutions Grant funds to support local service providers in enhancing the quality and capacity of emergency shelters and ensuring the delivery of essential services to shelter residents.

The City's one-year goals include:

- Supporting the expansion of low-barrier, trauma-informed emergency shelter options.
- Prioritizing Emergency Solutions Grants and other resources to sustain and strengthen shelter operations.
- Enhancing coordination among service providers to ensure efficient shelter referrals and exits to permanent housing.

#### Transitional and Supportive Housing:

While federal priorities have shifted away from transitional housing in favor of Rapid Re-Housing and Permanent Supportive Housing, the City recognizes that transitional housing remains a valuable resource for specific populations. Family Promise of the Lower Cape Fear continues to operate transitional housing for families with minor children, addressing a critical gap in the system. The Leading Into New Communities (LINC) organization continues to operate transitional housing and supportive services for individuals reentering the community from the criminal justice system, helping them stabilize and reintegrate successfully.

At the same time, Rapid Re-Housing and Permanent Supportive Housing programs are central to the community's long-term housing strategy:

• **Rapid Re-Housing** programs, operated by providers such as Good Shepherd Center and Family Promise, offer short-term rental assistance and services to quickly stabilize Draft Annual Action Plan individuals and families.

• **Permanent Supportive Housing** programs, administered by Good Shepherd Center and Coastal Horizons Center, provide long-term housing and supportive services to chronically homeless individuals, particularly those with disabilities.

All housing programs are currently challenged by a highly competitive and increasingly unaffordable rental market, which limits the availability of suitable units for both newly housed individuals and those at risk of displacement. To address this, the City of Wilmington will continue to:

- Collaborate with housing providers to support tenant retention and landlord engagement efforts.
- Target funding to a mix of emergency, transitional, and permanent housing interventions.
- Work to identify and address gaps in services and housing stock through ongoing data analysis and stakeholder engagement.

By aligning local resources and strategies with CoC priorities and HUD guidance, the City remains committed to reducing and ultimately ending homelessness in the region.

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 of Wilmington, in collaboration with the CFHCoC, continues to implement targeted strategies to help individuals and families experiencing homelessness transition to permanent housing and independent living. These efforts focus particularly on vulnerable populations, including chronically homeless individuals, families with children, veterans, and unaccompanied youth.

The City provides operational support for a 9-bed emergency shelter for youth ages 7–18, which emphasizes family reunification and housing stability for older youth transitioning to independence. Additionally, the CoC's Veterans Strategy Team, which includes the U.S. Department of Veterans Affairs, County Veterans Service Officers, and local nonprofits, works to streamline access to services and housing resources for veterans and their families.

Outreach and shelter staff across the community are trained to conduct Coordinated Entry intakes, ensuring that individuals—particularly those who are chronically homeless—are assessed consistently and equitably for services and housing. The CoC Coordinated Entry

Advisory Committee, with support from HUD Technical Assistance, recently redesigned the Coordinated Entry process to better reflect the needs and priorities of the local community.

Efforts to improve service coordination for homeless families with children continue. The CoC works closely with the public school system to enhance support for McKinney-Vento-eligible students and their families, improving identification and access to housing and stabilization resources.

To foster system-wide collaboration, the CoC convenes a Creative Solutions Workgroup, bringing together both traditional and non-traditional partners to explore innovative strategies. These partnerships align resources and expertise, allowing agencies to focus on their core strengths while maximizing service delivery across the continuum.

From January to December 2024, 701 individuals entered the CES. Of these 338 were members of a family and 365 were single individuals. Children aged 0-17 made up 23% of the total entries into the system (160), while seniors over 60 accounted for 14% (95). CE staffing meetings are held bi-monthly, which include 15–20 agencies—ranging from emergency shelters and housing providers to mental health and substance use treatment programs. These meetings allow providers to coordinate care, track progress, and ensure timely housing connections.

In 2024, 270 individuals exited the CES. Of those 270, 71 (26%) exited to a rental with no ongoing housing subsidy, 75 (28%) exited to a rental with an ongoing housing subsidy, and 26 (10%) exited to live with friends or family.

System-wide data collection has been instrumental in identifying trends and targeting resources. In the most recent reports to HUD for 2024:

- More than 95% of individuals that exit the CFHCoC's homeless system maintain permanent housing after 1 year.
- Approximately 28% of respondents in the 2024 Point-in-Time Count reported being chronically homeless.
- Families experiencing homelessness average more than double the number of days homeless than a single individual household.

These findings are driving local conversations around the need for affordable, accessible housing and wraparound services. As part of its commitment to expanding housing options for individuals with the highest barriers to stability, the CoC has engaged with HUD Technical Assistance to identify strategies for increasing local Permanent Supportive Housing capacity. Through this Technical Assistance engagement, the CoC has conducted a system-wide assessment of existing resources, identified service gaps, and begun exploring innovative models to develop new Permanent Supportive Housing units, particularly for chronically

homeless individuals and those with disabling conditions. The Technical Assistance process has helped the community align its strategic goals with HUD priorities, leverage non-traditional funding sources, and strengthen partnerships between housing providers, healthcare agencies, and supportive service organizations. These efforts are laying the groundwork for a more coordinated approach to long-term housing solutions, with a focus on sustainability and improved outcomes for the most vulnerable populations.

Through these coordinated strategies, the City of Wilmington remains committed to reducing the duration of homelessness, improving housing access, and preventing future episodes of homelessness for those who have been rehoused.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City of Wilmington and its community partners work collaboratively to prevent homelessness among low-income and extremely low-income individuals and families, including those exiting publicly funded institutions and systems of care. While resources for prevention remain limited, the community strategically leverages available funding and partnerships to address housing crises before they lead to homelessness.

Prevention assistance is primarily provided through Emergency Food and Shelter Program funds, administered locally by The Salvation Army, New Hanover County Department of Social Services, and the Help Hub, an interfaith collaboration offering emergency financial support. For utility-related needs, the community relies on the Low-Income Energy Assistance Program, also managed through New Hanover County Department of Social Services. Additional locally administered emergency funds help households maintain housing stability.

The disAbility Resource Center, the area's Center for Independent Living, plays a critical role in assisting individuals with disabilities by connecting them to income-based housing and supportive services. Additionally, the Cape Fear Housing Coalition maintains and distributes a widely used Affordable Housing Guide, which helps cost-burdened residents identify available housing opportunities and navigate the application process.

To support individuals exiting the criminal justice system, the City provides funding to the Leading Into New Communities (LINC) organization. These services are designed to stabilize participants and support successful reintegration into the community.

The CoC CES has also expanded efforts to facilitate early intervention. CES staff now refer individuals at risk of homelessness to appropriate community providers more quickly, improving access to housing assistance, health and behavioral health services, employment support, and other critical resources.

Through these collective efforts, the City and its partners aim to reduce the number of individuals and families entering homelessness by strengthening early intervention, enhancing coordination among service systems, and ensuring vulnerable populations—especially those discharged from institutions—have access to the support they need to remain stably housed.

### AP-75 Barriers to affordable housing – 91.220(j) Introduction:

As Wilmington's popularity continues and the population and development activity increases, less and less greenfield development is possible. An added challenge is a NIMBY mindset, or Not In My Back Yard. Concerns related to property value and crime arise despite a large number of residents that qualify or need support for housing costs in the city are public safety workers, medical staff, teachers, etc. that experience longer commutes to work as a result of high housing prices. Undoubtedly, the sharing of information related to the AMI and what constitutes housing cost burden will prove a useful tool in combating negative perceptions to affordable housing initiatives.

Land Development Codes that require rezoning or additional conditions be applied for multifamily or residential subdivisions can cause an increase in development costs which only get applied to the end user, which in the case of residential development, is the renter or homebuyer. Again, challenges related to NIMBY opposition may occur but this time during a public hearing.

Wilmington's workforce is broadening, but some work categories are still burdened with wages that do not align adequately with housing prices driven. Statistics shown by professors at the University of North Carolina Wilmington show population increases have not been occurring as a result of infant births but rather in-migration from other states. The current and permitted residential projects are, and likely will continue to be, inadequate for the amount of growth the region is experiencing. Though an increase in housing units overall helps support housing affordability in an indirect way, due to the heavy market demand and material costs, housing that is affordable to residents earning 80% AMI or less is difficult to find and build.

Many African American households in Wilmington are concentrated in two R/ECAP. Households in R/ECAPs frequently have access to schools that require additional funding and support to provide a solid foundation for district youth and employment opportunities that provide a level of stability for households are often outside of the immediate area. Census data shows that households in R/ECAPs tend to be of lower socio-economic status and frequently have less opportunity than those outside R/ECAPs. A focus for both community and economic development in historically black and African American neighborhoods continues as an opportunity.

State opposition to inclusionary zoning limits local jurisdictions' ability to mandate the inclusion of affordable housing throughout the community.

Increasing material and labor costs continue to inhibit the forward progress of affordable

housing projects and residential rehabilitations. At varying levels of government, adequate funding to both administer programs and support projects is slowed due to considerations of a government's role to use certain funding sources to address the affordable housing crisis that affects a large population of Wilmington residents and negatively impacts families in the region through increased commute times, less tertiary time, and a decreased work-life balance.

## Actions it planned 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

Appropriation of General Fund revenues to the City's HOP program provides homeownership opportunities for households earning up to 80% AMI. This dampens the negative effects of income inequity and provides a mobility strategy for low-to-moderate income families. Likewise, City General Funds for the City's OOR Program support housing repair and rehab loans to those earning below 50% AMI. These loans are both deferred and forgivable. This program helps address blight and displacement of lower income households due to economic pressure.

The Affordable Housing Fund by City Council is also to be used to provide gap financing to leverage other public and private funding to produce additional housing units target to low-to-moderate income households is a policy action to ameliorate barriers to resources for affordable housing and the shortage of housing that is affordable for working households earning at or below 80% AMI.

Increasing public awareness of housing issues and understanding of the need for housing that is affordable for working families. Dispelling myths about affordable housing and the negative stereotypes associated with affordable housing is recognized as an important strategy to garner more local resources for affordable housing.

Updates to the Land Development Code allowing higher density residential development and increased density for projects including affordable housing, in selected areas, have been adopted. Additionally, the new Land Development Code modifies regulations addressing Accessory Dwelling Units. While these changes are a step in the right direction, most of the City is zoned and developed as single-family residential and increased density and changes to traditional development patterns face opposition from many citizens.

In addition to the production of more affordable housing, the creation of better paying jobs, and wage equity will go a long way towards addressing the City's barriers to affordable housing.

#### Discussion:

City Council has identified workforce/affordable housing as a priority and is engaging the private sector, public sector officials, non-profits, and others in formulating strategies to increase housing that is affordable throughout the city.

#### AP-85 Other Actions – 91.220(k)

#### Introduction:

Community development requires a comprehensive multi-faceted approach that recognizes the inter-related impact of housing, jobs, education, health, and the quality of life for all citizens. Addressing the obstacles and factors contributing to disinvestment and lack of opportunity benefits all members of the community.

#### Actions planned to address obstacles to meeting underserved needs

The City will continue funding for programs that address needs for elderly, disabled, homeless, formerly incarcerated, victims of domestic violence, victims of child abuse and other needs. Continued support and work with community agencies working to address the needs of special populations is planned in the FY25/26 City Budget and in this Annual Action Plan.

#### Actions planned to foster and maintain affordable housing

Actions planned to increase and foster affordable housing are forthcoming in the anticipated development of a Housing Plan by the Workforce Housing Advisory Committee. Additional resources are needed to address the gap in housing. Additional HOME funds received from the American Recovery Act are being used to implement the HOME American Recovery Act Allocation Plan, which addresses Homeless Services, Shelter, and Permanent Housing. Over \$2.1 million has been approved for the construction of 32 units of Supportive Rental Housing and the remaining amount will be awarded for supportive services and non-profit capacity building.

Leveraging existing resources to maximize benefit can be achieved by collaborating with private and community-based efforts to acquire and preserve naturally occurring affordable housing. The city's Rental Rehabilitation Loan Program and Housing Production Loan Programs are available to support private investment initiatives.

Finally, as a Housing Counseling Agency the City meets HUD's requirement for HUD funded loans to receive housing counseling; and the City will offer housing counseling services that can be expanded to serve homeowners at risk of foreclosure and renters experiencing cost burden. This service can assist citizens with financial literacy, credit repair and developing a feasible housing plan.

#### Actions planned to reduce lead-based paint hazards

The City of Wilmington addresses lead-based paint hazards through the following activities.

All rehabilitation projects for pre-1978 owner-occupied homes and pre-1978 homes that fall

under the homebuyer assistance programs receive a formal Lead Inspection Risk Assessment. Homes where lead-based paint hazards are identified are remediated as necessary and in accordance with all HUD, Environmental Protection Agency, and state regulations and requirements.

Through a HUD Office of Lead Hazard Control and Healthy Homes Lead Hazard Control grant, the City was awarded in 2019, the City was able to apply \$839,541.20 in support of Lead Based Paint Remediation and Healthy Homes Intervention activities for the period January 2020 to July 2023. Despite the adverse impacts of the COVID-19 Pandemic, a total of 32 units were assessed, 25 units cleared, and over 45,000 residents of the City of Wilmington were engaged and/or exposed to programs promoting awareness of Lead Based Paint Hazards, Healthy Homes concepts, and the City of Wilmington's Lead Hazard Reduction / Healthy Homes Grant Assistance Program. This grant program's period of performance ended July 2023.

Through a HUD Office of Lead Hazard Control and Healthy Homes - Healthy Homes Production \$1.5 million 3.5-year grant the City was awarded in May 2023, the City addresses Home Health and Safety Hazards for qualified units. Remediation of lead-based paint hazards in qualified pre-1978 units is addressed as appropriate through this program. This program will provide education and awareness of not only the hazards of lead-based paint, but also other principles of Healthy Homes to all residents of the City, an assessment of no fewer than 100 units, and the clearance of no fewer than 60 units during the grant period of performance.

#### Actions planned to reduce the number of poverty-level families

City support for youth enrichment programs, literacy, jobs skills and placement initiatives are all aimed towards reducing poverty by enhancing the education and skills and employment of low-income persons.

#### Actions planned to develop institutional structure

Continued collaboration with community-based organizations, public and private entities working to address affordable housing and needs of the underserved and protected classes is planned to maintain and improve institutional structure in the community. The City's Community Development and Housing staff, in partnership with other agencies, works to build the capacity of agencies serving lower income households and communities with one-one technical assistance and participation in workshops and trainings, such as Fair Housing Workshop for Homeless Service providers as one example.

The implementation of project management software for rehab loans and HOP loans is improving project management and efficiency. In addition, the community development and

housing staff have and continue to participate in professional development including, but not limited to, HUD Homebuyer Counseling, Project Management, and Leadership Development.

# Actions planned to enhance coordination between public and private housing and social service agencies

City community development and housing staff members represent the City on several community development organizations such as the Cape Fear Housing Coalition, the CFHCoC Board of Directors, and the Cape Fear Resiliency Task Force. Additionally, Community Development & Housing staff participate in the City's and the New Hanover County's Comprehensive Planning efforts. In FY26, Community Development & Housing staff will continue to support the work of a joint City/County Workforce Housing Advisory Committee comprised of representatives of the non-profit and private sectors to make recommendations to the Wilmington City Council and New Hanover County Commissioners for local policy and other actions. Community Development & Housing staff members attend City Technical Review Committee meetings when residential projects are being reviewed to provide input and learn about upcoming residential development. Community Development & Housing staff will continue working with non-profit and private housing and social services agencies to implement the goals and recommendations coming out of the aforementioned efforts and plans.

#### Discussion:

The City of Wilmington City Council has identified Engagement in Civic Partnerships as a Strategic Plan Focus Area. The City has a long history of working with the community and community-based organizations to identify and address community needs. The community development and housing staff members work to be responsive and engaged with the stakeholders in community development and housing programs.

## Program Specific Requirements AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

This section provides the requested information on CDBG and HOME funds and policies.

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Total Program Income	600
5. The amount of income from float-funded activities	0
planned use has not been included in a prior statement or plan.	
4. The amount of any grant funds returned to the line of credit for which the	0
3. The amount of surplus funds from urban renewal settlements	0
identified in the grantee's strategic plan	
used during the year to address the priority needs and specific objectives	
2. The amount of proceeds from section 108 loan guarantees that will be	0
the start of the next program year and that has not yet been reprogrammed	
1. The total amount of program income that will have been received before	600

### **Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that	80.00%
benefit persons of low and moderate income. Overall Benefit - A consecutive	
period of one, two or three years may be used to determine that a minimum	
overall benefit of 70% of CDBG funds is used to benefit persons of low and	
moderate income. Specify the years covered that include this Annual Action	
Plan.	

## HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Wilmington uses HOME funds for home eligible activities. HOME funds are used to support owner-occupied housing rehab, CHDO housing production and when available gap financing for multi-family rental projects using North Carolina Housing Finance Agency Low Income Housing Tax Credits or Permanent Supportive Housing funds.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

#### Recapture

The City will use restrictions in the promissory note and deed of trust to enforce the recapture provisions of the HOME program found at 24 CFR 92.254 (a)(5)(ii). In accordance with applicable recapture provisions the City requires the recapture of its HOME–funded homeownership housing assistance from net sales proceeds when the original homebuyer sells the property during the affordability period. Any net proceeds in excess of the original HOME subsidy will go the homeowner. The City will recapture 100 percent of the net proceeds up to the amount of the HOME subsidy. In the case where there are insufficient net proceeds available at sale to recapture the entire direct HOME subsidy provided to the homeowner, the City can only recapture what is available from net proceeds. The City will limit the amount to be recaptured to the net proceeds, as defined herein, available from the sale of the property.

#### Resale

The City will use Resale provisions as required when HOME funds are used to provide subsidy to the developer that will not result in a Direct HOME subsidy to the homebuyer. "Resale" provisions will be used for HOME funds used for acquisition of land held in a Community Housing Land Trust, which constitutes a developer subsidy. Under the Land Trust model, the land acquired with HOME funds will be held in trust and not conveyed to the homebuyer. A long-term ground lease between the Land Trust and Homebuyer will establish long-term affordability of the property, and the distribution of value of improvements between the Land Trust and homebuyer upon sale of the housing unit. The ground lease ensures that the original homeowner receives a fair return on investment and that the property is sold at a price that is affordable to a reasonable range of low-income buyers. In addition, the City will utilize deed restrictions to ensure continued affordability, along with a deferred promissory note and deed of trust, with covenants and deed restrictions as enforcement mechanism.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

For units acquired with HOME funds for homeownership, Deed Restrictions and a Deed of Trust are recorded to the property(s) that upon the sale of the property, the City would recapture HOME funds if the owner did not remain in the property for the length of the affordability period. It is also written in these documents that the funds are due and payable if the owners are no longer occupying the property as their primary residence.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows: The City of Wilmington does not use HOME funds to refinance existing debt on a multi-family property.
- 5. If applicable to a planned HOME Tenant Based Rental Assistance activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).
- 6. If applicable to a planned HOME Tenant Based Rental Assistance activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(I)(2)(vii)).
- If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

In accordance with 24 CFR 92.254 the City of Wilmington uses the following approaches to for qualification of housing as affordable.

The City uses HOME funds for down payment assistance and owner-occupied housing rehabilitation for single-family housing. CDBG funds are used for homebuyer assistance in the City's HOP program. All participants/borrowers of CDBG and HOME funds are determined to be income eligible with incomes at or below 80% AMI adjusted for family size. Housing units are determined to be modest as described in 24 CFR 92.254. The City request HUD provide limits for newly constructed housing and existing housing as set out 24 CRR 92.254 (a)(2)(iii).

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## ATTACHMENTS

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# **Survey Results**

<ul> <li>The three (3) most important types of Public Services are:</li> <li>1. Job skills training &amp; apprenticeships</li> <li>2. Quality affordable childcare</li> <li>3. Food banks</li> <li>4. Medical and dental services</li> </ul>	<ol> <li>Housing counseling and financial literacy</li> <li>Options for transitioning out of public housing</li> </ol>	<ol><li>Domestic abuse services</li><li>Child abuse prevention/intervention/counseling services</li></ol>	<ol> <li>Senior services</li> <li>Neighborhood beautification/clean-ups</li> </ol>		400	350	300	250	200	150	20	0 1 2 3 4 5 6 7 8 9 10 11 12
<ul> <li>The three (3) most important Public Investments:</li> <li>1. Provide financial assistance to help homebuyers afford a home</li> <li>2. Provide financial assistance to help homeowners</li> <li>repair/rehabilitate their home</li> <li>3. Construct new housing that is affordable for working families</li> </ul>	Rehabilitate/repair vacant housing for homeowne affordable for working families	<ol><li>Rehabilitate/repair vacant housing for rental that is affordable for working families</li></ol>	<ol><li>provide funding to support emergency shelters for homeless persons</li></ol>	<ol><li>Construct housing to be used for elderly and disabled persons with limited incomes</li></ol>	600			400	300	200		0 1 2 3 4 5 6 7 8

400 300

<ul> <li>The three (3) most important items for quality of life in</li> </ul>	<ul> <li>The top three (3) issues related to affordable housing are:</li> </ul>
neighborhoods are:	1. Not enough housing for people earning 80% of the area
1. Affordable, safe housing	median income or less
2. Equal access to good paying jobs	2. Homelessness
3. Equal access to high quality public education	3. Housing that is affordable is located far from retail and
4. Low crime rate/absence of gangs	employment centers, and requires a commute and/or the use
5. Well-connected bus system	of a private vehicle
6. Close to grocery stores, health care facilities, and other	4. Not enough housing options for people earning 60-80% of the
services	area median income (ami for 1 and 4 family households)
7. Housing that is affordable to a range of income levels	5. Not enough housing available at different price points
8. Mix of housing types and ownership/rental opportunities	6. Not enough homes available to rent within city limits
9. Close to jobs	7. Not enough homes available to buy within city limits
10. Safe, convenient, high quality youth programs for children	8. Not enough housing types to choose from
11. Well-maintained yards, homes, and businesses	9. Homeownership expenses such as repairs and utilities are too
12. Positive landlord-tenant relationships	high
13. Equal access to owner/rental housing across the city	
600	
	500
500	
	400
400	
	300
300	C C C C
200	Z00
	100
	1 2 3 4 5 6 7 8 9
1 2 3 4 5 6 7 8 9 10 11 12 13	

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• The three (3) most critical homeless service needs are:	that provide temporary financial assistance, rental subsidies,	or supportive services to prevent individuals and families at	risk of becoming nomeless 2. Permanent supportive housing - housing combined with wrap-	around health and social services	3. Rapid rehousing: short- or medium-term rental assistance,	connection to housing, and voluntary services for those	experiencing homelessness	centers, and overnight shelters	5. Housing navigation: connecting individuals and families at risk	of or experiencing homelessness to housing	800		700		600	500	400	300	200	100	
omeowner?									NO Current homeowner	l live in or am interested in the following housing types. (select all				. condo	e (duplex)					Multi-family Two-family Accessory	attached d home
Would you like to become a homeowner?		Current homeowner							YES	or am interested in the	that apply)	Single-family detached	Townhouse	Multi-family apartment or condo	Two-family attached home (duplex)	Accessory dwelling unit				Single-family Townhouse M	

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(duplex)

- I represent the following: •
- **Concerned** citizen 0
- Community advocate 0
- Non-profit / social services provider 0
- **Religious organization** 0
- Governmental organization 0
- **Business/employer** 0
- Other 0



- Do you live in the City of Wilmington? •
- Yes 0
  - ٥ 0



In what zip code is your home located? (enter 5-digit ZIP code; for example, 00544 or 94305) •



what is your age? Please check one. •

0 45-54						
35-44	75 or	older				
0	0					
o <b>25-34</b>	o <b>65-74</b>					
o <b>18-24</b>	o <b>55-64</b>					
			2E0		200	150



- what is your gender? •
- Male 0
- Female 0
- Other 0



- What is your race?
- White ÷
- Black or African American 5.
- American Indian or Alaska Native с.
  - Asian 4.
- Native Hawaiian or Other Pacific Islander ю. ני
  - Two or More Races



- Are you of Hispanic or Latino descent?
- Yes, Hispanic or Latino 0
- No, not Hispanic or Latino 0



what is your approximate average household income?

\$50,000- \$74,999	\$75,000- \$99,999	\$100,000- \$149,999	-
0	0	0	
<ul><li>Less than \$10,000</li></ul>	\$10,000-\$14,999	› \$15,000- \$24,999	
0	0	0	

- 0 515,000- 524,999
- \$150,000-\$199,999 0 \$25,000- \$34,999 0 0
  - \$200,000 or more 0 \$35,000- \$49,999



- Do you rent or own the place where you live? •

- OwnRentOther



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# **Public Comments**

#### **Gilbert Combs**

From:	Kelsey Roth <kelkel3185@gmail.com></kelkel3185@gmail.com>
Sent:	Sunday, June 1, 2025 10:01 PM
То:	Gilbert Combs
Subject:	Survey Feedback

Hi,

My name is Kelsey Lucas. I've lived in Wilmington for around 16 years now. My occupation often involves working with and advocating for those with traumatic brain injury. One topic that comes up often in our meetings is the desire for green spaces, particularly those that are accessible for everyone. Green spaces have so many benefits, including positive impact on both physical and mental health within a community. I noticed that a lot of the survey seemed geared towards additional development, housing, etc. But I think also ensuring that current residents have the spaces and places to enjoy the beautiful area we live in promotes a thriving community.

Thanks,

Kelsey

Sent from my iPhone

#### **Gilbert Combs**

From:	Michael Cobb <cobbmj929@yahoo.com></cobbmj929@yahoo.com>
Sent:	Friday, May 30, 2025 9:07 AM
То:	Gilbert Combs
Subject:	City's Housing survey

Greetings Mr. Gilbert Combs,

Thank you for surveying the Wilmington community about our views regarding housing. While public opinion is important, it does not always reflect facts. I hope someone on your staff is using the variety of unbiased resources available. When I was working, as a researcher, I often used MIT's Living Wage Calculator, found here:

Living Wage Calculator - Living Wage Calculation for New Hanover County, North Carolina livingwage.mit.edu

It shows what one would need to earn in order to live in New Hanover County. Unfortunately, people looking for affordable housing aren't making these types of wages.

	1 ADULT				2 ADULTS (1 WORKING)				2 ADULTS (BOTH WORKIN		
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children
Living Wage	\$21.43	\$37.77	\$45.54	\$57.99	\$31.98	\$37.01	\$40.65	\$47.32	\$15.99	\$21.35	\$25.33
Poverty Wage	\$7.52	\$10.17	\$12.81	\$15.46	\$10.17	\$12.81	\$15.46	\$18.10	\$5.08	\$6.41	\$7.73
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25

The housing needs to be what they can afford not what the industry creating. Below are the estimated costs for families, based on the best research.

		1 A	DULT			2 ADULTS	(1 WORKING)		2 ADULTS (BOTH				
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 C		
Food	\$4,690	\$6,897	\$10,331	\$13,744	\$8,598	\$10,687	\$13,747	\$16,770	\$8,598	\$10,687	\$1		
Child Care	\$0	\$9,891	\$17,521	\$23,514	\$0	\$0	\$0	\$0	\$0	\$9,891	\$1		
Medical	\$3,258	\$8,628	\$8,701	\$8,777	\$7,330	\$9,589	\$9,861	\$10,162	\$7,330	\$9,589	\$1		
Housing	\$13,050	\$19,039	\$19,0 <mark>3</mark> 9	\$25,149	<mark>\$17,196</mark>	\$19,039	\$19,039	\$25,149	\$17,1 <mark>9</mark> 6	\$19,0 <mark>3</mark> 9	\$1		
Transportation	\$8,639	\$9,998	\$12,594	\$14,491	\$9,998	\$12,594	\$14,491	\$16,076	\$9,998	\$12,594	\$1		
Civic	\$2,589	\$4,557	\$5,031	\$6,450	\$4,557	\$5,031	\$6,450	\$7,156	\$4,557	\$5,031	\$1		
Internet & Mobile	\$1,487	\$1,487	\$1,487	\$1,487	\$2,069	\$2,069	\$2,069	\$2,069	\$2,069	\$2,069	\$:		
Other	\$3,770	\$7,242	\$7,587	\$9,120	\$7,242	\$8,033	\$9,120	\$10,117	\$7,242	\$8,033	\$1		
Required annual income after taxes	\$37,483	\$67,739	\$82,291	\$102,733	\$56,990	\$67,043	\$74,778	\$87,499	\$56,990	\$76,934	\$9		
Annual taxes	\$7,0 <mark>8</mark> 7	\$10,8 <mark>3</mark> 3	\$12,4 <mark>3</mark> 8	\$17,878	\$9,539	\$9,941	\$9,766	\$10,919	\$9,539	\$11,884	\$1		
Required annual income before taxes	\$44,570	\$78,572	\$94,729	\$120,611	\$66,528	\$76,984	\$84,545	\$98,418	\$66,528	\$88,818	\$1(		
			S	creenshot									

I look forward to the Council devising appropriate goals using research-based numbers to have informed discussions that solve the City's and County's needs.

Michael

#### **Gilbert Combs**

From:	Ken Lindsay <ken@fivestoneshomeworks.com></ken@fivestoneshomeworks.com>
Sent:	Friday, June 6, 2025 3:57 PM
То:	Gilbert Combs
Subject:	Housing Comment

We moved to the Wilmington area in 2024. While not wealthy, we were very privileged in our home buying, as we did not need a contingency to sell, had financing that exceeded our price range secured prior to making offer, and the employment flexibility to spend time during the weekdays looking at homes.

Our experience was difficult, and shed light on the impossibility of home ownership for many. Here is a quick recap of our experience:

In our first entered contract a home inspection discovered \$70,000 of needed repairs, including multiple components of the electrical system in unsafe condition. As the seller would not take care of the costs to make remedies, we had to forfeit a non-refundable due diligence deposit. Our Agent was unwilling to represent us in pursuit of recapturing our due diligence money, and refused to make other offers on our behalf without due diligence money being offered.

I quickly learned non-refundable due diligence monies are often times being weaponized by real estate agents, even against their own Buyer clients. While we were a privileged buyer, most are not, and the loss of due diligence money could easily result in fund depletion to the point of preventing them from re-entering the buying market.

In May of 2024 Port City Daily reported New Hanover County ranked the fourth most difficult county nationwide to buy a home.

I believe continuing to allow middle class priced homes to be subject to non-refundable due diligence monies is being complicit in the ultimate gentrification of the area by eliminating those with lesser financial abilities to participate in home ownership. I recommend consideration of regulations on non-refundable due diligence monies be limited to only the highest priced homes, and allow affordable homes to be obtainable by middle class families, without unfair leverage against them. Perhaps only homes above \$1,000,000 should be allowed to have non-refundable monies as part of the contract.

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# **Proof of Publication**

Job Gemile	Schedule for ad number LWLN00060110
faire business	Barr May 26, 2128
(minedation)	annungen unterset.
Install Labor	AL 88164
Periaga	The City of Wilmington
Latin to Processor	Announces a
a a managed and	Public Comment Period on
And pag matry	the City's
Account Details	
Dep in the second	DRAFT
In Day of the	2025-2026 ANNUAL ACTION
and an excited to be a set of the	PLAN
Marring and designed and	For
Rep in Indonesian	Community Development
	Block Grant (CDBG) &
	HOME Programs
	and a
	Public Hearing
	Tuesday, June 17, 2025, 6:30
	p.m.
	at the Wilmington City Hall
	Council Chambers
	102 North 3rd Street, Wilm-
	ington, NC 28401
	The Public Comment Period
	and Public Hearing is an
	opportunity for the citizens
	of Wilmington to comment
	on the plan noted above.
	The 30-day Public Comment
	Period will begin on May 28,
	2025, and ends at noon June
	26, 2025. For more informa-
	tion and to access a copy of
	the plan please visit FY26

Annual Action Plan .

Citizens may submit comments via email to gilbert.combs@wilming-tonnc.gov no later than noon on Thursday, June 26, 2025, during the Public Comment Period.

For additional information, please contact Gilbert Combs, Community Development and Housing Manager Housing and Neighborhood Services Department At (910) 341-7836

The City of Wilmington does not discriminate on the basis of race, sex, color, national origin, religion or disability in its employment opportunities, programs or activities. All requests for appropriate auxiliary aids and services, when necesand services, when neces-sary to offer a person with a disability the opportunity to participate in or enjoy the benefits of City services, programs or activities must be made within a reasonable time prior to the activity.

May 25 2025 LWLM0300811