



City of Wilmington  
FY 2026-27 Annual Action Plan  
for  
CDBG and HOME Funds  
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Annual Action Plan - DRAFT

# City of Wilmington

## City Council

Bill Saffo, Mayor

Kevin Spears, Mayor Pro-Tem

Salette Andrews

David Joyner

Chakema Clinton-Quintana

JC Lyle

Cassidy Santaguida

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Becky Hawke, City Manager

Dennis LaCaria, Chief of Staff

Thom Moton, Jr., Deputy City Manager

Mary Vigue, Deputy City Manager

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### **Community Building Department**

Rachel Schuler, Community Building Director

#### **Affordable Housing Division**

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Mike Ferraro, Housing Rehab Technician

Todd Fiskin, Facilities Project Coordinator

Chianti Johnson, Community Development Analyst, Compliance

Abby King, Community Development Specialist

Brittany Redd, Administrative Support Specialist

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Holly Bruhn, Loan and Entitlement Grants Manager

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Community Building/Affordable Housing

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## Contingency Statement

The Annual Action Plan uses the FY2026-2027 grant allocations from the U.S. Department of Housing and Urban Development (HUD). The grant allocations are not available at the time of its publication. As in previous years, there may be slight differences in the funding amounts provided in Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). Upon receipt of the actual allocations, the City will adjust the budget of the federal funds as described below:

Program	Additional Funds to be Budgeted for	Fewer Funds to be Subtracted From
CDBG	Owner-occupied Rehab	Owner-occupied Rehab
HOME	Gap Financing	Gap Financing

FY2025-2026 HUD Allocations:

Community Development Block Grant (CDBG): \$871,503

HOME Investment Partnerships Program (HOME): \$575,573

## **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 the federal fiscal year 202- CDBG and HOME awards. The Annual Action Plan for the fifth 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. Funding for the next fiscal year has not been released at the time of this draft report. In addition, as of December 30, 2025, the plan identifies prior-year funds totaling \$1,554,580.56 in CDBG, \$2,532,918.61 in HOME, and \$4,858,254.52. in General Funds, all allocated to program activities. As for loans currently in the pipeline (estimated future expenditure), \$1,579,000 is expected to close for two gap financing projects and one HOP project, as of March 2026.

In years past, the Human Services Grant was an opportunity to partner with local non-profit organizations providing services to low- to moderate-income households. The HSG is transforming into a more focused and supportive program called the Community Investment Program. This program will solicit requests for proposals from agencies to deliver services that support and advance the goals and initiatives outlined in the City of Wilmington’s Strategic Plan and other adopted plans.

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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) and the Owner-occupied Housing Rehabilitation Loan (OOR). 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 as they navigate an ever-challenging housing market. In FY26, staff continued to invest in Housing Counseling training with the intention to expand capacity and services in FY27.

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 is 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 fifth 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.

According to the 2024 5-year American Community Survey, approximately 48% of occupied housing units are owner-occupied, with the remaining 52% being renter-occupied. Residents of renter-occupied homes become some of the most vulnerable to market changes since rental rates for both single dwelling and multiple dwelling housing units may, and have been, increasing annually, and without restrictions, can push citizens into being housing cost burdened. Housing cost burden generally considers household income and 30% or more going toward rent or mortgage, and any associated costs of owning a home, such as utilities and maintenance, for example.

According to the above-mentioned dataset, the median rent in Wilmington is \$1,395, and 56.4% of renter-occupied housing units (nearly 16,000 households) pay 30% or more of their household income toward rent. In comparison, the median mortgage in Wilmington is \$2,020, and in units with a mortgage, 29% of households (over 5,100 households) pay 30% of their household income toward their mortgage. This supports the goals of the affordable housing division to strengthen

neighborhood resiliency through increased owner-occupied units and the Home Ownership Pool program.

The care and upkeep of owner-occupied housing is a related and important component of strong neighborhoods. Not only are owner-occupied households protected from fluctuations in the local housing market, but concepts of defensible space, such as territoriality and natural surveillance, or “eyes on the street,” can help create safer neighborhoods. Upkeep of properties can still be challenging for low- to moderate-income households. The city’s rehabilitation programs, particularly the Healthy Homes Production Grant program, helped identify and resolve immediate repair needs and provided relief to the city’s owner-occupied rehabilitation program and those of partner agencies.

Due to federal considerations, no new funding opportunities were issued for the Healthy Homes Production Grant. As a result, FY27, the division intends to create a completely independent Healthy Homes program that follows the 11 principles of a healthy home and is supported with local dollars. With gratitude to the Wilmington City Council, a contribution directly to an affordable housing fund is made each year that helps to leverage federal funding and, in some cases, fully support the division's initiatives.

With an average of 20-30 years before major residential systems need replacement, it is important to note that of the city's nearly 63,000 total housing units, 82.3% (nearly 52,000) were built before 2009. Not all of these units are single dwelling detached.

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.*

This is an evaluation of past performance that helped the grantee to choose its goals or projects. From 2016 to March of 2026, the City’s Affordable Housing programs have accomplished the following:

- Increase and Maintain Rental Housing – 496 units
- Homebuyer Assistance: HOP and Downpayment Assistance – 161 households/units
- Homeownership Housing Production for very low & low income – 26 units
- Owner-Occupied Housing Rehabilitation/Repair - 78 households/units
- Emergency Shelter & Services –18,912 individuals
- Homeless to Permanent Housing – 1,462

- Produce Permanent Supportive Housing – 91 units
- Homeownership Education –1,854 individuals
- Housing Counseling One-On-One (begin 2023) –385
- Preserve & maintain public facilities – 11 projects completed
- Promote workforce development through education, training, job placement –12,490 individuals (CDBG, General Funds)
- Support quality youth programs for at-risk youth – 40,977 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 19,567 (General Funds); 3,658,462 pounds of food distributed

The City’s federal funds are invested in benefiting low-income households and producing and maintain housing for owners and renters. Although the City works to leverage funds and generate program income where appropriate; there 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 and 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 build on the City’s ongoing participation and collaboration with community-based organizations and City-appointed volunteers serving on advisory committees. 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 notifications were sent via email to community partners and shared 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.*

**TBD**

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

**TBD**

#### **7. Summary**

**TBD**

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**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.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	Wilmington	Community Building / Affordable Housing
HOME Administrator	Wilmington	Community Building / Affordable 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. Affordable Housing is a division of the Community Building 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**

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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 Affordable 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 such as health fairs, housing fairs, and community festivals to engage with members of the public in low- to moderate-income neighborhoods. Lastly, City Affordable Housing staff collaborate with agencies to facilitate the implementation of community development activities, solicit input, and consult on affordable 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(l))**

A variety of engagement strategies enhance the coordination between the 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 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 Service funds are allocated for homeless service and shelter programs. City staff serve as representatives of the CFHCoC and have a designated seat on 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 ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

**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 / Organization	Agency / Group / Organization Type	What section of the Plan was addressed by Consultation?	Briefly describe how the Agency / Group / 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
Blue Ribbon Commission	Services-Children Services-Education Services-Employment	Housing Need Assessment Economic Development Anti-poverty Strategy	Survey; submission of application for funding; one-on-one interview
Boys & Girls Club of Southeastern North Carolina	Services-Children Services-Education	Anti-poverty Strategy	Submission of application for funding; one-on-one interview; 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

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Cape Fear Literacy Council	Services-Education	Housing Need Assessment Economic Development Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
Coastal Horizons Inc.	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy	Survey
Communities In Schools Cape Fear	Services-Children Services-Education	Housing Need Assessment Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
DREAMS OF WILMINGTON, INC	Services-Children Services-Education	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
First Fruit Ministries	Services-Persons with Disabilities Services-homeless	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
FOOD BANK OF CENTRAL & EASTERN NC	Food Bank	Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey

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Good Shepherd Ministries of Wilmington	Services-homeless	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Economic Development Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
Kids Making It	Services-Children Services-Education Services-Employment	Economic Development Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
LINC	Services - Housing Re-Entry	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy	Survey; submission of application for funding; one-on-one interview
New Hanover County	Other government – County	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy	Meeting with NHC staff members in Housing & Planning; Survey
StepUp Wilmington	Services-homeless Services-Education Services-Employment	Homelessness Strategy Economic Development Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey
UNCW	Services-Education	Housing Need Assessment Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy	Survey; University Community Relations Association committee meetings

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Wilmington Housing Authority	Public Housing Authority	Housing Need Assessment Public Housing Needs Anti-poverty Strategy	Meeting with WHA Staff & Board Members; Survey
Wilmington Regional Assoc REALTORS	Housing	Housing Need Assessment Market Analysis Economic Development	Survey
Wilmington Residential Adolescent Achievement Program	Services-Children Services-Education	Anti-poverty Strategy	Submission of application for funding; one-on-one interview; survey

**Table 2 – Agencies, groups, organizations who participated**

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

Not applicable

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

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 Care	Housing First; Permanent Supportive Housing; 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 Plan	New Hanover County	Coordinated Growth and Development regarding 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 Wilmington/WHA	City of Wilmington	Increase Opportunity and choice for protected classes to access housing, jobs, education, and other services
New Hanover County/City of Wilmington Housing Need	City of Wilmington/New Hanover County	Identifying housing gaps by tenure and income to effectively increase access to affordable housing.

**Table 3 – Other local/regional/federal planning efforts**

**Narrative (optional)**

Coordination with neighboring local governments is ongoing. In July of 2025, New Hanover County disbanded the joint City of Wilmington and New Hanover County Workforce Housing Advisory Committee (WHAC). Still committed to affordable and workforce housing efforts and considerations, the City of Wilmington is reviving the disbanded WHAC by creating a new City of Wilmington Housing Affordability Advisory Committee. 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.

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**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. The Workforce Housing Advisory Committee was a joint city/county committee with both Wilmington and New Hanover County. Affordable Housing staff also represent as members 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 regular scheduled meetings with citizens and stakeholders, a public meeting was held and advertised via a press release and email distribution lists.

A survey was distributed through press release, social media, and email distribution list. The survey was available from February 13, 2026, to February 27, 2026.

Please see attached for survey responses.

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**Citizen Participation Outreach**

<b>Sort Order</b>	<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/attendance</b>	<b>Summary of Comments received</b>	<b>Summary of comments not accepted and reasons</b>	<b>URL (If applicable)</b>
1	Public Hearing	Non-targeted/broad community	City Council/General Public in-person and via GTV 6/17/2025	No comments received		<a href="http://www.wilmingtonnc.gov/departments/city-manager/gtv8">www.wilmingtonnc.gov/departments/city-manager/gtv8</a>
3	Public Meeting	Homeless Service Providers/Advocates	Homeless Point in Time Data and other data regarding status of homelessness: pending	Need for homelessness prevention as well as Rapid Rehousing, Permanent Supportive Housing, and emergency services.	All comments received and accepted	<a href="https://capefearcog.org/homeless-services/homeless-data/">https://capefearcog.org/homeless-services/homeless-data/</a>
4	News Ad	Non-targeted/broad community	Advertised in Star-News 3/12/2026			
5	Internet Outreach	Non-targeted/broad community Housing Services providers & Advocates	Email distribution list to 150+ agencies and interested parties, notice to social media via City Corporate Affairs; posted on city website			<a href="http://Wilmingtonnc.gov">Wilmingtonnc.gov</a>

**Table 4 – Citizen Participation Outreach**

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## Expected Resources

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

#### Introduction

The activities, funding allocations, and program budgets contained in this Annual Action Plan are based on estimated funding levels for the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). Implementation of the programs and projects described herein is contingent upon the jurisdiction's receipt of official grant award notifications from the U.S. Department of Housing and Urban Development and the availability of appropriated federal funds.

Upon receipt of the final grant award amounts, the jurisdiction reserves the right to adjust program budgets, modify activity funding levels, and revise project schedules as necessary to ensure compliance with applicable federal regulations, including 24 CFR Part 91 and program-specific requirements for CDBG and HOME. Any adjustments will be made in accordance with the jurisdiction's citizen participation plan and applicable amendment procedures.

If the final allocations differ substantially from the estimated amounts used to develop this Annual Action Plan, the jurisdiction may reallocate funds among eligible activities or projects to address priority community development and affordable housing needs while maintaining compliance with HUD program requirements.

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**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$ (as of Dec 2025)	Prior Year Resources (FY25): \$	Total: \$		
CDBG	Public – Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	871,503 <small>(Assumed based on prior year award)</small>	509,459.38	1,045,121	1,380,962	0	Primarily directed to HOP Homebuyer 2 <sup>nd</sup> Mortgage; Public Services @ 15% Cap, including Homeless Shelter and Services, youth recreation programs, and crime prevention, public facilities
HOME	Public – Federal	Acquisition Homebuyer Assistance Homeowner Rehab Multifamily Rental New Construction Multifamily New Construction for ownership TBRA	575,573 <small>(Assumed based on prior year award)</small>	359,899	2,173,019	3,108,491	0	Primarily directed to Owner-occupied Rehab; Housing Production CHDOs; Permanent Supportive Housing; Multi-family Rental Gap Financing
General Fund	Public – Local	Acquisition Admin and Planning Homebuyer Assistance Homeowner Rehab Housing Multifamily Rental New Construction Multifamily New Construction for Ownership Public Services Healthy Homes Pilot Program	2,345,000	380,627	4,477,627	7,203,254	0	Rehab Forgivable Loans, HOP, Public Services, Housing Repair, CFHCoC Admin, Youth, Homeless, Food Access, Job Skills, Literacy, Victim Services, and Safe Haven

**Table 5 - Expected Resources – Priority Table**

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**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 shelters and services, youth programs, job skills and placement, elder care, etc. Wilmington City Council commits General Funds to support the aforementioned activities. Additionally, the City Council appropriates General Funds to the Affordable Housing Fund to provide assistance through the City's HOP and OOR programs. Partner banks provide approximately \$1 million in homebuyer assistance annually through the HOP program. HOME funds leverage Low Income Housing Tax Credits, North Carolina Housing Finance Agency, and private funds to develop 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. In September of 2022, the City Council approved the conveyance of this property to the Good Shepherd Center for the development of Permanent Supportive Housing. The project's development is supported by HOME-American Rescue Plan funding.

A November 21, 2017, Resolution passed by City Council directs that any public/private development project that includes residential units should include affordable housing, if possible. As City-owned properties are evaluated for surplus, conveyance for affordable housing is a priority for the 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	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	<b>Increase Affordable Housing Options</b>	2026	2027	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: \$901,637  HOME: \$887,944  General Fund: \$606,945	Rental units constructed: 30 Homeowner Housing Added: 1 Homeowner Housing constructed: 10 Direct Financial Assistance to Homebuyers: 6
2	<b>Support Public Services (Homeless Services &amp; Shelter, Youth, Job Training, etc.)</b>	2026	2027	Homeless Non-Homeless Special Needs Non-Housing Community Development	Northside Southside Sunset/ Longleaf City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs	CDBG: \$130,725  General Fund: \$793,763	Public service activities other than Low/Moderate Income Housing Benefit: 240  Homeless Person Overnight Shelter: 240
3	<b>Maintain Existing Affordable Housing</b>	2026	2027	Affordable Housing	City-wide	Disproportionate Housing Needs  R/ECAPs Public Supported Housing Fair Housing	HOME: \$775,000  General Fund: \$779,852  General Fund: \$250,000 (Healthy Homes)	Homeowner Housing Rehabilitated: 10
4	<b>Reduce Housing Discrimination</b>	2026	2027	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	2026	2027	Affordable Housing	City-wide	Disproportionate Housing Needs R/ECAPs Public Supported Housing Fair Housing	HOME: \$902,000 General Fund: \$3,952,520	Gap Financing: 50
6	Increase Homeownership Opportunities	2026	2027	Affordable Housing	City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs	CDBG: \$174,300 HOME: 450,000	Direct Financial Assistance to Homebuyers: 10
7	Increase Housing Counseling and Financial Literacy Opportunities	2026	2027	Affordable Housing	City-wide	Disparities in Access to Opportunity Disproportionate Housing Needs	General Fund: 100,000 (Housing Counseling Services)	Housing Counseling: 10 HBE One-one Sessions: 40 Clients Served
8	Improve Public Perception of Affordable Housing	2026	2027	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
9	Planning & Administration	2026	2027	Planning & Administration			CDBG: 174,300 HOME: 57,557 HOME Program Income: 35,990 General Fund: 720,174 (includes one-time consulting funds)	

Table 6 – Goals Summary

**Goal Descriptions**

Goal Name	Goal Description
<b>Increase Affordable Housing Options</b>	Increase production of rental housing including Permanent Supportive Rental housing, and other rental housing 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.
<b>Support Public Services (Homeless shelter and services, Youth, Job skills, etc.)</b>	Support Homeless Shelter and Service providers providing low-barrier, housing-first shelter and services. Support community-based programs and services to benefit low-to-moderate income individuals to access opportunities by increasing skills and supporting youth development. Support efforts to improve disparity in R/ECAPS. Increase access to supportive services and programs by funding public service programs serving at-risk youth, the elderly, the disabled, the homeless, and others. Programs include after-school and summer programs, job 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 individuals.
<b>Maintain Existing Affordable Housing</b>	Rehabilitate and/or repair an average of 10 owner-occupied houses per year
<b>Reduce Housing Discrimination</b>	Conduct at least one workshop annually on fair housing for landlords, lenders, and housing managers to review housing for persons disabilities and reasonable accommodations; collaborate with and support City/County Community Relations Advisory Committee in Fair Housing Education and Enforcement efforts.
<b>Expand &amp; Improve Access to Funding Sources for Affordable Housing Development</b>	Provide gap financing to leverage other financing and equity investments to produce new affordable housing for low- to moderate-income households, 50 units per year
<b>Increase Home Ownership</b>	Partner with area banks to provide up to 6 mortgages annually, through the HOP program, to households at or below 80% AMI.
<b>Increase Housing Counseling and Financial Literacy Opportunities</b>	Provide group and one-one housing counseling sessions for individuals seeking pre-purchase, post-purchase, delinquent housing counseling for 40 clients annually
<b>Perception of Affordable Housing</b>	Increase Affordable Housing Marketing, Awareness and Education throughout the community. Partner with Cape 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.

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## 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 facilities, 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 July 1, 2026, through June 30, 2027. This is the fifth year of the City of Wilmington’s 2022-2026 Consolidated Plan, based on the 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 FY2026-27 budget year. The Annual Plan also describes projects and programs/activities that are underway and have prior year funds 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 the Low-Income Housing Tax Credit, that take several years to complete. Finally, the City’s OOR and HOP programs accept applications on an ongoing basis, and loans may originate in one program year and close in another.

In FY27, the City is budgeting CDBG and HOME funds as allocated by HUD per the 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 \$509,459.38 and \$359,899.37 in HOME. Prior-year funds and Revolving Loan Funds are also available to complete projects or support ongoing programs/activities. There was also \$1,579,000 in loans pending closing and in process.

FY27 Funds will be used for the Owner-Occupied Housing Rehabilitation (OOR) 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, programs, and 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 align 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 Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Planning and Administration	Northside Southside City-wide Sunset/ Woodlawn/ Longleaf	Increase Affordable Housing Options Support Public Service Programs Expand Funding Sources Affordable Housing Development	Disparities in Access to Opportunity Disproportionate Housing Needs R/ECAPs Public Supported Housing Fair Housing	General Funds: \$720,174 CDBG admin: \$174,300 CDBG Program Delivery: 174,300 HOME Program Income: \$35,990 HOME: \$57,557	Planning and Administration for CDBG and HOME	6/30/2027	N/A		Planning & Administration
Housing	Northside Southside City-wide Sunset/ Woodlawn/ Longleaf	Increase Affordable Housing Options Support Public Service Programs Expand Funding Sources Affordable Housing Develop	Disparities in Access to Opportunity Disproportionate Housing Needs R/ECAPs Public Supported Housing Fair Housing	General Fund: \$5,689,317 CDBG: \$901,637 HOME: \$2,141,002 HOME CHDO: \$873,942	CHDO set-aside Homebuyer Assistance -HOP Downpayment Assistance; Owner-Occupied Rehab Rental Rehab Housing Production – Single-family/ Multifamily Rental	6/30/2027	Over 1,200 individuals from families of low-to-moderate income will benefit from the projects		<ul style="list-style-type: none"> <li>• Rehabilitation projects for single-family</li> <li>• CHDO Projects</li> <li>• HOP Loans</li> <li>• Owner-Occupied Rehab Loans</li> <li>• Downpayment Assistance</li> <li>• Housing Production</li> </ul>
Public Services	Northside Southside City-wide Sunset/ Woodlawn/ Longleaf	Support Public Service Programs	Disparities in Access to Opportunity	General Funds: \$793,763 CDBG: \$130,725	After School & Summer Youth Programs; Job Skills & Training, Job Placement, Elder Programs; Re-Entry; Homeless Shelter & Services; Enhanced Homeless Street Outreach; Crime Prevention; Literacy; Foodbanks and Meals	6/30/2027	Programs supported through CDBG and General Funds will serve at least 2,000 low- to moderate-income youth, elderly persons, homeless persons, and other special populations.  Funding will also support the CFHCoC		<p><b>CDBG:</b> Homeless Shelter and Services Crime Prevention</p> <p><b>General Fund:</b> Human Services Grant</p>

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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 to the Northside and Southside areas identified in the Assessment of Fair Housing as R/ECAPs, as well as to areas of opportunity throughout the City, to help ensure a balanced approach to Affirmatively Furthering 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 live in areas of the city that offer 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 currently have a Neighborhood Revitalization Strategy Area. The previous Neighborhood Revitalization Strategy Area was 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 the revitalization of R/ECAPs to increase opportunities for safe, decent, affordable housing, youth services, jobs, and amenities.

## Affordable Housing

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

#### Introduction

The City of Wilmington's affordable housing goals direct resources to the City to implement 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. Affordable housing is not readily available within the City; the private housing market does not meet the demand for it.

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

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

<b>One Year Goals for the Number of Households Supported Through</b>	
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 that offer emergency shelter, case management, and other services to help people experiencing homelessness transition into housing. In FY26, the City solicited proposals for a low- to no-barrier shelter partner to further support some of the most vulnerable members of the community.

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 FY2026, there are more applicants than contractors available to rehabilitate the homes.

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 the acquisition of existing units is 12; 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 to acquire existing units for rehabilitation, for either ownership or rental.

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## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Housing Authority of the City of Wilmington, North Carolina manages Public Housing, Housing Choice Vouchers, and other housing programs 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** WHA previously completed the relocation and remediation efforts associated with mold related unit conditions. Families displaced during the remediation period were returned to safe housing and the agency continues to monitor units, educate residents, and implement preventative maintenance practices to avoid future occurrences.

**Redevelopment & Rehabilitation Commitments** WHA continues to prioritize major redevelopment and rehabilitation initiatives across its housing portfolio. These efforts are guided by several key principles:

One for one replacement of housing units  
Build First strategies when feasible to minimize displacement  
Right of residents to return to appropriately sized units  
Utilization of the Rental Assistance Demonstration (RAD) program to preserve affordable housing

### Key Projects

**Hillcrest Redevelopment** Hillcrest Phase I consists of 84 units of senior housing currently planned as part of the initial redevelopment phase. Hillcrest Phase II will introduce approximately 204 mixed family units along with a 10,000 square foot community center designed to support resident services, community programming, and neighborhood engagement.

**Houston Moore Redevelopment** 200 units | Approximately \$65.4 million WHA continues to partner with Lincoln Avenue Capital and Georgetown Development as planning and redevelopment efforts move forward.

**Solomon Towers Modernization** 151 units | Approximately \$30.3 million The rehabilitation and modernization of Solomon Towers is progressing toward closing in 2026 with construction and improvements expected to follow.

**Jervay Communities Redevelopment** The existing 82 units within Jervay Communities are currently undergoing rehabilitation. Additionally, 18 units that were significantly damaged during Hurricane Florence in 2018 will be demolished and rebuilt. The redevelopment is being carried out in partnership with Blue Ridge Atlantic. As part of the redevelopment, additional housing will be constructed along Dawson Street through a new residential building named Dawson Lofts II. This new building will remain part of the broader Jervay Communities redevelopment and will

expand the overall housing capacity of the site.

#### Resident & Staff Support

Maintenance and property management staff continue to receive training in asset management, compliance, and mold prevention. WHA maintains strong training partnerships with Cape Fear Community College, NAHRO, PHADA, and HAI Group. Pre occupancy housekeeping training remains in place to reduce mold risk and educate tenants on maintenance responsibilities. WHA has also expanded its Section 3 Resident Hiring Program to increase employment opportunities for public housing residents.

#### Digital Access & Community Engagement

WHA continues maintaining its updated website to provide accessible information including agency news, meeting minutes, and resident resources. The agency continues to operate under its service standard known as the “3 C’s” which emphasizes Courteous, Complete, and Clean service delivery.

#### Ongoing Development Partnerships

WHA continues to engage with development partners and funding sources to expand affordable housing opportunities 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 maintains Resident Advisory Boards across its communities. These boards provide resident feedback and input into agency policies including the WHA Annual Plan. Residents also have access to self sufficiency programs such as Family Self Sufficiency (FSS), ROSS, Jobs Plus, and services supported by the Multifamily Elderly Services Grant. The Housing Choice Voucher program continues landlord outreach efforts and maintains payment standards at up to 120 percent of HUD Fair Market Rent to expand housing options for voucher holders.

#### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

In August 2024 the Housing Authority of the City of Wilmington was designated as a troubled housing authority by HUD. Since that time WHA has been working closely with HUD to implement a restructuring plan focused on leadership improvements, financial management practices, service delivery protocols, and strengthened reporting and compliance systems. These reforms are intended to improve operational performance and position the agency to remove the troubled designation.

#### **Discussion**

WHA’s long term vision focuses on sustainable housing development, resident centered communities, and economic opportunity for residents. The agency remains committed to providing

safe, high quality, and affordable housing while strengthening partnerships that support equitable housing access and long term community stability throughout Southeastern North Carolina.

Provided by WHA.

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

### **Introduction**

The City of Wilmington provides Community Development Block Grant (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 Cape Fear Homeless Continuum of Care (CFHCoC).

The Cape Fear Homeless Continuum of Care (CFHCoC) is the U.S. Department of Housing and Urban Development (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 (COG) 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 COG 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.
- CES is a federally required, coordinated, community-wide system that ensures standardized intake, assessment, and referral processes. 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 sub-committees; 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 (LSA), Housing Inventory Count (HIC), Emergency Solutions Grant CAPER, and System Performance Measures (SysPM). The COG also coordinates the annual Point-in-Time (PIT) 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 Continuum of Care (CoC) 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 (PIT) 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 (funded through the Projects for Assistance in Transition from Homelessness (PATH) grant)
- Coastal Horizons Youth Street Outreach

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

GIS mapping from the annual PIT count is used to identify areas with high concentrations of unsheltered individuals, enabling more strategic deployment of outreach resources.

**Support Services and Day Shelters:**

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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. New service partnerships are actively pursued, including mobile laundry facilities provided by Catholic Charities in collaboration with the Living Hope Day Shelter.

**Mobile Outreach:**

Mobile units operated by Hope Recovery Church, The Warming Shelter, 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, including maintaining a joint website, [mobileshowersilm.com](http://mobileshowersilm.com), which serves as a centralized hub for updated schedules, locations, volunteer opportunities, and donation needs. The shared platform improves coordination among providers, increases accessibility for individuals seeking services, and enhances community awareness and engagement around mobile hygiene and outreach efforts.

**Assessment and Coordinated Entry:**

All individuals engaged through outreach—either directly or via community partners such as Coastal Horizons Center, Good Shepherd Center, MedNorth, New Hanover Regional Medical Center, SOAR Disability Advocates, and The Salvation Army—are connected to the

**Coordinated Entry System (CES).** CES ensures individuals are assessed using a standardized tool, referred to service providers, and prioritized for housing placements based on need, in alignment with HUD regulations.

**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 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 Homeless Management Information System (HMIS). This data is regularly analyzed and shared with stakeholders to evaluate program effectiveness, identify system gaps, and refine strategies to better serve individuals experiencing homelessness. For example, HMIS trend analysis revealed a significant increase in first-time homelessness among individuals entering emergency shelter and transitional housing, rising from 60% in 2020 to 76% in 2025, with a high of 86% in 2024. This shift indicated that more households were entering the homeless system for the first time rather than returning after prior episodes, signaling growing housing instability in the broader

community. In response, the City and Continuum of Care prioritized the development of a new homelessness prevention initiative funded with Emergency Solutions Grant (ESG) dollars, aimed at intervening earlier and stabilizing households before they enter shelter. This targeted investment reflects the community's commitment to using real-time data to drive strategic resource allocation and system improvement.

### **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 Cape Fear Homeless Continuum of Care (CFHCoC) and local service providers to address the evolving emergency shelter and transitional housing needs of individuals and families experiencing homelessness.

#### **Emergency Shelter:**

Local shelters have continued to lower entry barriers, while seeing an increasing demand for emergency shelter services. Unfortunately, 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.

Further compounding this issue was the temporary closure of the Salvation Army facility, one of the region's largest emergency shelters, which significantly reduced available bed space and placed additional strain on the local homeless response system. The shelter has since reopened and is currently implementing phased enrollments as it works toward returning to full operational capacity. As capacity is restored, the CoC anticipates some relief to the pressure experienced by other shelters and outreach providers during the closure. In the meantime, the CoC continues to administer Emergency Solutions Grant (ESG) 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 ESG 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 recent federal priorities have emphasized Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH), there are ongoing discussions at the national level about the role transitional housing can play as part of a balanced homeless response system. Recognizing that different populations require different types of interventions, the City continues to support a range of shelter and housing options that promote stability and long-term housing outcomes. Family Promise of the Lower Cape Fear operates a temporary shelter model, designed specifically for

families with minor children, including providing extended shelter stays paired with intensive case management and housing stabilization support. Leading Into New Communities (LINC) continues to operate transitional housing and supportive services for individuals reentering the community from the criminal justice system, helping participants stabilize and successfully reintegrate into the community. This past year, LINC has expanded its reentry housing capacity by adding transitional housing beds at the STAR (Successful Transition and Reentry) Center, creating additional opportunities for individuals returning from incarceration to access stable housing paired with supportive services. At the same time, RRH and PSH programs are central to the community's long-term housing strategy:

- **RRH** programs, operated by **Good Shepherd Center** offer short-term rental assistance and services to quickly stabilize individuals and families.
- **PSH** 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 Cape Fear Homeless Continuum of Care (CoC), 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 nonprofit partners, works collaboratively to streamline access to services and housing resources for veterans and their families experiencing homelessness. Through this coordinated approach, the community is able to connect veterans with targeted housing and supportive services, including transitional housing through Ashley House, which serves homeless veterans in the region. Rapid rehousing and homelessness prevention assistance are also available through Supportive Services for Veteran Families (SSVF) programs operated by Veteran Services of the Carolinas and Volunteers of America, providing short-term financial assistance, case management, and housing stabilization support. Together, these partnerships strengthen the community's ability to quickly identify and assist veterans experiencing homelessness and connect them to appropriate housing solutions.

Outreach and shelter staff across the community are trained to conduct Coordinated Entry (CE) 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 CE 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 supports 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 2025, 638 individuals entered the Coordinated Entry System. Of these 262 were members of a family and 377 were single individuals. Children ages 0-17 made up 19% of the total entries into the system (124), while seniors over 60 accounted for 18% (113). 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 2025, 785 individuals exited the CES. Of those 785, 537 represented an overhaul and system

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clean up where participants who had an expired ROI and had not had contact with any system provider were exited. Of the 248 exited the system outside of the clean up, 57 (23%) exited to a rental with no ongoing housing subsidy, 99 (40%) exited to a rental with an ongoing housing subsidy, and 40 (16%) 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 2025:

- More than 96% of individuals that exit the CFHCoC's homeless system maintain permanent housing after 1 year.
- Approximately 30% of respondents in the 2025 Point in Time Count reported being chronically homeless.
- The average length of time between project start date and housing move-in date for households without children was 19.29. For households with children was 155.33. This significant difference reflects the ongoing challenge of locating affordable multi-bedroom units in the local housing market, which often results in longer search times for families with children.

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 (TA) to identify strategies for increasing local Permanent Supportive Housing (PSH) capacity. Through this TA engagement, the CoC has conducted a system-wide assessment of existing resources, identified service gaps, and begun exploring innovative models to develop new PSH units, particularly for chronically homeless individuals and those with disabling conditions. The TA 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 (EFSP) funds, administered locally by The Salvation Army, New Hanover County Department of Social Services (DSS), 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 (LIEAP), also managed through DSS. Additional locally administered emergency funds help households maintain housing stability.

The community has also invested in strengthening housing navigation services to support households at risk of homelessness. The Harrelson Center operates a Housing Navigation Program that provides homelessness prevention services. They connect individuals and families to available housing resources, assist with landlord engagement, provide financial assistance where appropriate and help households overcome common barriers to securing and maintaining housing. Beginning in 2026, this program is supported through Emergency Solutions Grant (ESG) funding to specifically serve households with incomes at or below 30 percent of Area Median Income (AMI). By providing targeted housing search assistance and coordination with landlords and service providers, the program helps households stabilize quickly and avoid entering the homeless response system.

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 Leading Into New Communities (LINC), which offers transitional housing and reentry programming to formerly incarcerated individuals. These services are designed to stabilize participants and support successful reintegration into the community. This past year, LINC has expanded its reentry housing capacity by adding transitional housing beds at the STAR (Successful Transition and Reentry) Center, creating additional opportunities for individuals returning from incarceration to access stable housing paired with supportive services. By combining housing with case management, employment support, and reentry-focused programming, these efforts help reduce the risk of homelessness and improve long-term outcomes for individuals transitioning back into the community.

The CoC Coordinated Entry System (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.

### **Discussion**

Provided by Cape Fear Homeless Continuum of Care.

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

### **Introduction:**

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

Land Development Codes that require rezoning or additional conditions to be applied for multi-family or residential subdivisions can cause an increase in development costs, which only get applied to the end user, who, 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 from professors at the University of North Carolina Wilmington show that population increases have not resulted from infant births but rather from in-migration from other states. The current and permitted residential projects are, and will likely continue to be, inadequate for the level of growth the region is experiencing. Though an increase in housing units overall helps support housing affordability indirectly, due to high market demand and material costs, housing 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 offer stability for households are often outside the immediate area. Census data show that households in R/ECAPs tend to be of lower socio-economic status and often have fewer opportunities than those outside R/ECAPs. A focus on both community and economic development in historically black and African American neighborhoods remains 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, fewer tertiary activities, 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 helps mitigate 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 the displacement of lower-income households driven by economic pressures.

The Affordable Housing Fund by the City Council is also to be used to provide gap financing to leverage other public and private funding to produce additional housing units targeted 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 and negative stereotypes about affordable housing is recognized as an important strategy to secure more local resources for it.

Updates to the Land Development Code allowing higher-density residential development and increased density for affordable-housing projects 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 producing more affordable housing, creating better-paying jobs and achieving 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 to formulate strategies to increase affordable housing throughout the city.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Community development requires a comprehensive, multi-faceted approach that recognizes the interrelated 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 the elderly, disabled, homeless, formerly incarcerated, victims of domestic violence, victims of child abuse, and other needs. Continued support and collaboration with community agencies addressing the needs of special populations are planned in the FY26/27 City Budget and in this Annual Action Plan.

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

Additional resources are needed to address the housing gap. In FY23, \$2,513,506 HOME funds received from the American Recovery Act were used to implement the HOME American Recovery Act Allocation Plan, which addresses Homeless Services, Shelter, and Permanent Housing. Over \$2.1 million was 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 Affordable Housing Development Program is 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 the development of a feasible housing plan.

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

The City of Wilmington has addressed or is addressing 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 and 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 in July 2023.

Through a HUD Office of Lead Hazard Control and Healthy Homes - Healthy Homes Production \$1.5 million 3.5-year grant awarded to the City in May 2023, the City addresses Home Health and Safety Hazards in qualified units. Remediation of lead-based paint hazards in qualified pre-1978 units is addressed as appropriate through this program. The program provided education and awareness not only about the hazards of lead-based paint but also about other principles of Healthy Homes to all City residents through the proposed 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, job skills, and placement initiatives is 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 and public and private entities working to address affordable housing and the needs of underserved and protected classes is planned to maintain and improve the community's institutional structure. The City's Affordable Housing staff, in partnership with other agencies, works to build the capacity of agencies serving lower-income households and communities through one-on-one technical assistance and participation in workshops and trainings, such as the Fair Housing Workshop for Homeless Service providers.

The implementation of project management software for rehab loans and HOP loans is improving project management and efficiency. In addition, the affordable housing staff has and continues 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 affordable 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.

Affordable Housing staff members attend the City Technical Review Committee meetings when residential projects are being reviewed to provide input and learn about upcoming residential development. Affordable Housing staff will continue working with non-profit and private housing and social services agencies to implement the goals and recommendations arising from 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 affordable housing staff members work to be responsive and engaged with the stakeholders in affordable housing programs.

**Program Specific Requirements**

**AP-90 Program Specific Requirements – 91.220(l)(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(l)(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.

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

**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 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.	80.00%

**HOME Investment Partnership Program (HOME)**

**Reference 24 CFR 91.220(l)(2)**

- 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.*
- 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 to 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.

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. These documents also state 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 multifamily property.

5. *If applicable to a planned HOME TBRA 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(l)(2)(vii)).*
6. *If applicable to a planned HOME TBRA 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(l)(2)(vii)).*
7. *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 qualify housing as affordable.

The City uses HOME funds for down-payment assistance and owner-occupied single-family housing rehabilitation. 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% of the AMI, adjusted for family size. Housing units are

determined to be modest as described in 24 CFR 92.254. The City requests that HUD provide limits for newly constructed housing and existing housing as set out 24 CRR 92.254 (a)(2)(iii).

DRAFT

**ATTACHMENTS**

Annual Action Plan – DRAFT

**PROOF OF PUBLICATION**

Annual Action Plan – DRAFT

The City of Wilmington  
Announces a  
Public Comment Period on  
the City's  
DRAFT  
2026-2027 ANNUAL ACTION  
PLAN  
For  
Community Development  
Block Grant (CDBG) & HOME  
Programs  
and a  
Public Hearing  
Tuesday, April 7, 2026  
6:30 p.m.  
City Hall  
Skyline Center  
Council Chambers  
929 N. Front St.,  
Wilmington, NC 28402  
The Public Comment Period  
and Public Hearing are  
opportunities for citizens  
of Wilmington and other  
stakeholders to comment on  
the plan noted above.  
The 30-day Public Comment  
Period will begin on March  
12, 2026, and end at 5 p.m.  
on April 10, 2026. A copy of  
this plan will also be avail-  
able at the Skyline Center,  
the NHC Public Library, and  
the Wilmington Housing  
Authority.

Citizens may submit  
comments via email to  
gilbert.combs@wilmingtonnc.gov no later than 5  
p.m. on Friday, April 10,  
2026, during the Public  
Comment Period.  
For additional information,  
please contact  
Gilbert Combs, Affordable  
Housing Manager  
Community Building Depart-  
ment  
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 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.  
Publication Dates  
LWLM0474902