

2024-2028 Consolidated Plan

FINAL DRAFT

City of Spartanburg 187 W Broad Street Spartanburg, SC 29304

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Executive Summary

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

1. Introduction

The City of Spartanburg's Neighborhood Services Department is the lead agency responsible for preparing the 2024-2028 Consolidated Plan and first year PY 2024 Annual Action Plan (AAP). This plan details how the City intends to invest its resources to meet the ongoing affordable housing, community development, and public service needs over the next five years of the Consolidated Plan. As an entitlement city, designated by the U.S. Department of Housing and Urban Development (HUD), the City of Spartanburg receives annually and administers Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) program funding.

The Consolidated Plan serves as the City's planning document meeting the federal government statutory requirements in 24 CFR 91.200 through 91.230, for preparing a Consolidated Plan. The Consolidated Plan includes a section on the Citizen Participation Process, Housing Needs Assessment, Housing Market Analysis, Five-Year Strategic Plan, and the PY 2024 AAP. The Strategic Plan identifies the priority housing and community development needs of the City, and develops goals to address these needs over a 5-year period. These goals are supported by CDBG and HOME funds.

The PY 2024 AAP is the first year of the 5-year Strategic Plan, which runs from July 1, 2024 to June 30, 2025. HUD provides CDBG and HOME funds annually, and each year the AAP provides specific projects and activities that will further the goals of the 5-year Strategic Plan. After each program year, the City will measure its progress in the Consolidated Annual Performance and Evaluation Report (CAPER).

The Neighborhood Services Department, as the City's lead department responsible for overseeing the development of the plan, serves as the housing redevelopment arm of the City of Spartanburg. The purpose of the department is to provide decent and affordable housing, a suitable living environment, and vital public services to improve the quality of life for its citizens. The City does this in a variety of ways, which include partnerships with public and private funders, both federal and local, as well as partnerships with corporations, nonprofits, public institutions, and most importantly, residents of the community.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City of Spartanburg has developed its strategic plan based on an analysis of the data presented in the Needs Assessment, the Market Analysis, and the community participation process which includes consultation of local agencies and nonprofit organizations. Through these efforts, the Neighborhood Services Department has identified four (4) priority needs and associated goals to address these needs. Over the 5-Year plan period, the City will work to accomplish the following outcomes, which are listed by Priority Need.

Priority Need: Public Improvements

1A Expand & Improve Public Infrastructure

The City will expand and improve public infrastructure through activities in low/mod areas. Activities may include ADA compliance for curb ramps, streets, sidewalks and roadway safety projects.

1B Improve Access to Public Facilities

The City will improve access to public infrastructure in low/mod areas. Public infrastructure activities may include improvements to parks and recreation centers, neighborhood facilities and homeless shelters.

Priority Need: Preserve & Develop Affordable Housing

2A Provide for Owner Occupied Housing Rehab

The City will partner with housing service providers and nonprofit organizations to rehabilitate owner-occupied housing, including emergency repairs and minor structural rehab. Housing rehab activities will target LMI households.

2B Increase Homeowner Hsng Opportunities

The City will provide for new homeowner housing opportunities such as the construction of new housing and/or direct financial assistance where needed. New homeowner housing opportunities will target LMI households.

2C Increase Renter Housing Opportunities

The City will partner with housing service providers and nonprofit organizations to develop affordable rental housing units and or/or provide rental assistance. Rental housing opportunities will target LMI households.

2D Reduce Slum & Blight in Residential Areas

The City will demolish buildings condemned due to code enforcement regulations in an effort to reduce slum and blight in low-moderate income areas.

Priority Need: Public Services & Quality of Life Improvements

3A Provide Services for LMI & Special Needs

The City will provide funding to non-profit organizations providing public services to LMI households and special need groups such as persons with a disability, the elderly and at-risk of homeless.

Priority Need: Effective Program Management

4A Effective Program Management

The City will provide for effective program management of the CDBG and HOME program. These activities will include the planning of programs, compliance, monitoring and reporting.

3. Evaluation of past performance

The City of Spartanburg has made significant contributions to provide safe, decent, and affordable housing, suitable living environments, and economic opportunities, especially for low-moderate income individuals in the community by working with public, private, and non-profit organizations. However, affordable housing development, owner occupied housing rehab, public services for LMI and homeless populations, and public infrastructure improvements remain some of the most prolific needs in Spartanburg as identified in the current Consolidated Plan and most recent PY 2022 Consolidated Annual Performance and Evaluation Report (CAPER).

The CAPER provides an assessment of progress towards the five-year goals and the one-year goals of HUD entitlement grants CDBG and HOME. The evaluation of the City's performance is summarized in the annual CAPER report. The following is a summary of accomplishments by priority:

Preserve and Develop Affordable Housing:

Through the HOME program, the City is continuing efforts to work with local nonprofits and CHDOs to increase affordable housing units. In PY 2022, The Bethlehem Center worked with the City to develop one affordable rental unit designated for senior citizens in the Highland Neighborhood. In previous years of the 5-year plan, the City helped fund construction on the '500 Northside Station', a 90-unit mixed income development project in the Northside neighborhood. In a private-public partnership including the Northside Development Group and The Spartanburg Housing Authority, the City also allocated CDBG and HOME funding toward the construction of 7 floating affordable rental units and infrastructure improvements on the site.

The City has also made progress in its goal to remove slum and blight citywide. Due to code enforcement efforts, dilapidated buildings were identified to be condemned and demolished, along with increased collaboration with Neighborhood Services and partnering agencies & departments for referrals to owner-occupied rehabilitation and Lead-Based-Paint Hazard Reduction and Healthy Home programs. The removal of slum and blighted properties is essential to allow for future development of safe and affordable housing and improve overall neighborhood aesthetic and pride.

The City of Spartanburg has continued its partnership with Christmas In Action (CIA) on their homeowner emergency repair program and have completed owner-occupied rehabilitation projects in the program year. The City expects to meet its five-year goal of 50 LMI households assisted with housing rehab activities.

Expand and Improve Public Infrastructure and Facilities:

In PY 2022, the City has worked toward its goals of Public Infrastructure Improvements and Expansion through continuing the "Art to the Streets" program, and both maintaining and improving infrastructure

on City-owned vacant lots and future neighborhood developments citywide. In previous years of the Strategic Plan period, the City has completed sidewalk improvements near the C.C. Woodson Community Center and in the Southside. While overall five-year goals have not yet been met, the City will continue to work towards identifying activities that will meet these needs.

Public Services and Quality of Life Improvements:

The City has addressed the need to improve the Quality of Life through Public Services and Non-Profit Organization subrecipients throughout the community in PY 2022. These activities included funding Youth programs and community engagement in the Highland Neighborhood with The Bethlehem Center; Youth mentorship and mental health resources with Big Brothers and Big Sisters of the Upstate; Transitional housing and counseling for homeless men with GoForth Recovery Center; Emergency shelter and case management for victims of domestics violence with Project R.E.S.T.; Free legal advice and counsel for civil matters for LMI persons with South Carolina Legal Services. These activities met the goal for the program year, and the City anticipates it will meet the overall goals of this need over the 5-year planning period.

CDBG-CV

Through the CARES Act, the City was allocated \$732,826 in CDBG-CV funds to prevent, prepare, and respond to COVID-19. The City incorporated those funds into their PY 2020 AAP and has since focused on the following projects to address the needs of LMI households affected by COVID-19 in the community: Economic Development, Public Facilities and Improvements, and Public Services.

The City partnered with Community Works to continue the Spartanburg Microbusiness Business Relief Program, which assisted 8 Microbusinesses in the City that were impacted by COVID-19. Overall, there have been 15 businesses assisted over the 5-year plan. Other organizations were supported to adapt their operations due to COVID-19, which included SAFE Homes, GoForth Recovery, and the Spartanburg Soup Kitchen. These services successfully provided an emergency response for the homeless, victims of domestic violence, vulnerable low/mod households and those needing subsistence payments to help them avoid homelessness during the pandemic. Homeless facilities were also assisted, and the City funded fire station equipment that helped to benefit low/mod residents across the City.

4. Summary of citizen participation process and consultation process

The City of Spartanburg follows its adopted and HUD approved Citizen Participation Plan (CPP). The CPP encourages citizen participation and involvement in all stages of the community planning process, from the 5-year Consolidated Plan, to the preparation of the Annual Action Plans, any substantial amendments to those plans, and the submission of the CAPER progress reports. The City holds public meetings and hearings both in-person and virtually, makes copies of the plans available for review at the Neighborhood Services office and on the City's website, and accepts and incorporates citizen input and feedback. The City continuously evaluates the means of providing information and makes adjustments to provide better

access to information regarding the CDBG and HOME program and other community activities. The City also consults with local nonprofits, government departments, and other agencies in the planning process.

For the Consolidated Plan and PY 2024 AAP, the following citizen participation outreach efforts were made:

<u>PUBLIC COMMENT PERIOD:</u> The City will hold a public comment period from **March 27, 2024 through April 27, 2024** to give citizens an opportunity to review and make comments on the draft plan. The plan can be viewed at the Neighborhood Services Department 187 W Broad Street Spartanburg, SC 29306 and online at https://www.cityofspartanburg.org.

<u>PUBLIC HEARINGS</u>: The City will hold a public hearing on April 4, 2024 at 6:00 PM in the Community Room at the Public Safety Building, 206 N Forest St, Spartanburg, SC 29301, and also on April 16, 2024 at 6:00 PM in the Spartanburg County Council Chambers, 366 N Church St, Main Level, Suite 1000, Spartanburg, SC 29303.

<u>PUBLIC MEETINGS:</u> The City met with four neighborhood associations in February 2024 to discuss the ConPlan and community development needs. A summary of each meeting is located in the AP-15.

<u>COMMUNITY SURVEY</u>: The City held a community survey online to gather public input on the housing and community development priority needs in Spartanburg. The link to the survey can be found at: https://www.research.net/r/CityofSpartanburg-ConPlan.

STAKEHOLDER SURVEY: The City held a nonprofit stakeholder survey online to gather public input on the housing and community development priority needs in Spartanburg. The link to the survey can be found at https://www.research.net/r/CityofSpartanburg-Stakeholder.

5. Summary of public comments

PUBLIC COMMENT PERIOD: No comments were made.

<u>PUBLIC HEARING (4/4/2024):</u> The following comments and questions were made at the public hearing.

- Could a family with 2 children be approved with \$80,000 income
- The amount of funds available
- Can funds be used to buy multi-family units
- Does the City fund rentals
- A request to show the list of nonprofit applicants
- Has the registration process started
- Find and fund one organization to address homelessness, instead of multiple
- Can the City get more funding
- Why are Northside buildings only 3 stories?
- Does getting a loan through these program raise your income level?

- Can individuals qualify for more than one program?
- Has number of rentals decreased?
- What is the minimum income to participate in programs
- Can a family get funding
- Can organizations get funds?
- Show how applicants are selected
- A question if tiny homes quality

PUBLIC HEARING (4/16/2024): The following comments and questions were made at the public hearing.

- Who are stakeholders
- What does CDBG stand for?
- How do nonprofits apply?
- What is the Northside doing?
- Where the affordable housing complex planned?
- Availability of funds
- What is the income limit and what happens if you are over
- Affordable complexes will use 80 or 60 percent AMI?
- Can rent at affordable housing be raised?
- Why does Ellington have all the rules with restrictions?
- How do nonprofits assist homeless veterans
- Does everybody who requests get funding?

<u>COMMUNITY SURVEY</u>: There were 239 responses to the community survey. The top priorities for the community were identified in this order:

- 1. Affordable Housing (new affordable rental and homeownership housing)
- 2. Public Improvements (street improvements)
- 3. Economic Development (public transportation)
- 4. Demolition (demolition of dilapidated housing)
- 5. Public Services (homeless services)

<u>STAKEHOLDER SURVEY:</u> There were 30 responses to the stakeholder survey. The top priorities for the community were identified in this order:

- 1. Affordable Housing
- 2. Access to Affordable, Efficient, and Reliable Public Transportation
- 3. Supportive Services for Low-Income Residents
- 4. Help for Nonprofits
- 5. Affordable Childcare

All comments and views were accepted at the public hearing and public comment period review process. A summary of outreach efforts is located in the PR-15 Participation.

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

All comments or views are welcome at the public hearing and public comment period.

7. Summary

This Consolidated Plan consists of a number of parts including: a housing and community needs assessment that analyzes the current market conditions, a section on the needs for people who are homeless, a section describing publicly supported housing needs, a section describing the citizen participation process, a Strategic Plan section and the PY 2024 Annual Action Plan (AAP). The Strategic Plan is a key component of the Consolidated Plan, as this section outlines the City's objectives and outcomes to meet the needs identified in the assessment section. The PY 2024 AAP is the first of five annual action plans, and outlines how federal resources will be allocated. Each year, an AAP will be completed to communicate how federal funds will be allocated to meet the objectives identified in the Consolidated Plan. The AAPs will also include a section that evaluates the City's performance towards meeting the objectives outlined in the Consolidated Plan, and each year a Consolidated Annual Performance and Evaluation Review (CAPER) is competed.

Not only are the priority needs in the City identified through the needs assessment and market analysis, the City of Spartanburg also determines these needs through a citizen participation process, which included engagement with community nonprofit organizations and with members of the community.

Primary data sources for the Consolidated Plan include: 2008-2012 & 2018-2022 American Community Survey (ACS) 5-Year Estimates, 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, Longitudinal Employer-Household Dynamics (LEHD), Homeless Management Information System (HMIS), Inventory Management System/PIH Information Center (PIC), HUD Income Limits, HUD Fair Market Rents and HOME Rent Limits and other local data sources. Data for map analysis came from the 2018-2022 ACS.

A disparity exists between data tables throughout the plan in that tables which utilize ACS contain 2018-2022 data and tables that utilize CHAS contain 2016-2020 data. At the time of writing, only 2016-2020 CHAS data was available from HUD. However, 2018-2022 ACS data was available, and the City has opted to utilize the most current data source where possible.

Analysis of Impediments to Fair Housing Choice

In 2019, the City of Spartanburg, in partnership with the County and the Spartanburg Housing Authority came together to carry out the Joint Analysis of Impediments of Fair Housing Choice (AI), which identified six impediments to fair housing in the region along with a table listing their associated contributing factors. Contributing factors are issues leading to an impediment that is likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors were also provided, along with goals, timelines, and responsible parties. Full details of the fair housing impediments can be viewed in the 2019 Joint AI. A list of the identified impediments is shown below:

- Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices
- Impediment #2: Neighborhoods Need Place-Based Community Investments
- Impediment #3: Need for Continued and Expanded Fair Housing Activities
- Impediment #4: Affordable Housing Planning Lacks Equity Focus
- Impediment #5: Limited Housing Options for People with Disabilities
- Impediment #6: Weak Job-Transit Connections

As noticed by HUD on February 9, 2023, entitlement communities will begin to develop Equity Plans, which will provide a fair housing analysis, goals and strategy, and community engagement. The Equity Plan will answer questions on demographics, segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAP), access to community assets, access to affordable housing opportunities, access to homeownership and economic opportunity, any discrimination or violations of civil rights, and local/state policies and practices that impact fair housing in the City of Spartanburg. The Equity Plan will help guide the goals of the five-year plan and provide strategies that the City will utilize to affirmatively further fair housing in Spartanburg.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	SPARTANBURG	Neighborhood Services
		Department
HOME Administrator	SPARTANBURG	Neighborhood Services
		Department

Table 1 - Responsible Agencies

Narrative

The City of Spartanburg's Neighborhood Services Department is the lead agency responsible for the development and implementation of the 2024-2028 Consolidated Plan and first-year PY 2024 Annual Action Plan (AAP). The Neighborhood Services Department is responsible for the administration of funding and compliance with federal regulations regarding the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) program funding from the U.S. Department of Housing and Urban Development (HUD).

Consolidated Plan Public Contact Information

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http://www.cityofspartanburg.org

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Spartanburg is engaged in ongoing efforts to increase coordination amongst the complex network of public, private, and non-profit organizations that deliver housing and social services to the community. As the administrators of the City's CDBG and HOME programs, the Neighborhood Services Department acts as a hub for community development in the area. The City maintains open lines of communication between the City and the numerous local agencies, governments, and nonprofit organizations to improve coordination of services and maximize impact.

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

The City continues to coordinate with affordable housing and social service agencies and seek opportunities to connect other organizations to this network. To overcome gaps in services, the City will continue to provide opportunities for public, private, and governmental organizations to come together and share information, advocate for issues of concern, leverage resources, and address barriers associated with providing more affordable housing. The City invites these agencies and organizations to community development public meetings and hearings in order to gain insight into housing and social service needs.

Spartanburg Housing, formerly known as the Spartanburg Housing Authority, is the local public housing authority in the area. The PHA provides affordable housing options in a variety of neighborhoods across the greater Spartanburg community. Their vision is to be nationally recognized as a catalyst for building strong partnerships to create healthy, sustainable, and inclusive communities by offering progressive housing programs that promote self-sufficiency, quality of life and economic vitality. The City shares the goal of providing affordable housing for its LMI residents and refers to the housing authority for the public housing needs of its residents. Funding is also made available to the housing authority through the grant application process.

The City of Spartanburg and Upstate Continuum of Care (CoC), described in more detail below, has a partnership, along with ongoing communication with public institutions and systems of care that help to guide the strategies used to prevent low-income individuals and families avoid becoming homeless, as well as for those who are being discharged from these systems and have nowhere to go. Some of these organizations include, but are not limited to Access Health, Spartanburg Mental Health, McKinney-Vento liaisons in the public schools, SC Department of Social Services, and local law enforcement.

High speed internet access remains a need for many low-income households in the City. To help bridge this digital divide, the Spartanburg County Public Libraries provides access to high-speed internet for all

residents in the City. Further, many high speed internet providers in Spartanburg are also offering services with the Affordable Connectivity Program discount, an FCC benefit program that helps ensure that households can afford the broadband they need for work, school, healthcare, etc. The City will engage with these organizations and businesses to meet the needs of residents.

SC DHEC is the state health and environmental control agency. The City consults with DHEC on lead-based paint hazard reduction activities and housing needs to reduce child blood-lead levels.

While the City's Neighborhood Services Department is the lead responsible department for the administration of the HUD CPD grant programs, contributing departments that help in the facilitation of activities include: Neighborhood Services, City Manager's Office, Homeless Engagement and Response Team, Property Maintenance and Code Enforcement, Community Relations. Emergency Services, a service component of the fire department, is responsible for emergency response and emergency planning and preparedness in the City.

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 Neighborhood Services Department maintains open communication networks with United Housing Connections (UHC), the lead agency of the Upstate Continuum of Care. The City uses data from the Point-in-time count and annual report to guide the City's Annual Action Plan. The City collaborates and funds several non-profits in the area that are dedicated to providing services to vulnerable populations such as the homeless, veterans, and families with children. The City is currently engaging the CoC and other stakeholders on a Homelessness Strategic Plan with the United Way, Spartanburg County, and the 1000 Feathers consulting group to provide a streamlined effort for services provided, moving forward. The City also has submitted a HOME-ARP plan with the assistance of Civitas consulting group, which included extensive consultation with the CoC and homelessness service providers.

The City acknowledges that the amount of services currently offered for special needs populations could benefit from improvements. These include services for children, women, chronically homeless individuals, elderly, and persons with disabilities (mental, physical, and developmental). The City has started a Homeless Engagement and Response Team and has hired an experienced Homeless Engagement Coordinator to advance these processes and guide activities.

Coordinated Entry System (CES) is the primary tool in which UHC and the CoC connect individuals and families in crisis situations with housing solutions. CES refers to the process where the COC provides housing assistance to people experiencing a need. UHC conforms to the standards described by HUD to ensure that the people we serve receive fair and equal access to housing assistance, based on their needs. The process of CES involves four key steps: 1) Access to people in need, 2) Assessment of needs, 3) Prioritization of people with the greatest needs, and 4) Referral to the appropriate housing and services that match their needs.

Regardless of location or method, UHC and the CoC use the same assessment to ensure that the people we serve are treated fairly. A key element of this process is to ensure that people with urgent housing or related needs receive priority access to the programs for which they're eligible. Regardless of how and where they are identified, CES enables the CoC to match people needs to the right housing and resources in a timely, consistent, and accurate manner.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Spartanburg does not receive ESG funds directly. The Neighborhood Services Department actively participates in the Cherokee Union Spartanburg (CUS) Chapter of the Upstate Continuum of Care to remain informed on activities and current data to guide the Annual Action Plan. The City of Spartanburg's Homeless Outreach Coordinator serves as the Secretary of the Chapter and the Community Development Director serves as a voting member in the COC.

The Upstate CoC HMIS is a web-based information management system used by the state, county, and local city governmental agencies as well as private sector entities such as nonprofits and health care agencies. This enables data sharing which assists providers to link the most appropriate services to homeless and low-income persons in the CoC region. The HMIS platform provides partner agencies with a flexible data management system for client documentation, case management, service tracking, and access to community resources. This helps to reduce duplication of efforts while helping to prioritize those with the most need. UHC, the CoC lead, provides local system administration services and support, training and management of the system. The system is integrated with the other HMIS systems in SC for a more inclusive approach that helps to enhance the ability to refer those needing services all over the State.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Spartanburg
	Agency/Group/Organization Type	Other government - Local
		Grantee Department

	What section of the Plan was addressed	Housing Need Assessment
	by Consultation?	Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Economic Development
		Anti-poverty Strategy
		Lead-based Paint Strategy
	Briefly describe how the	Ongoing communication and development of task
	Agency/Group/Organization was	forces and committees to address priority needs in
	consulted. What are the anticipated	the City. Contributing departments include:
	outcomes of the consultation or areas for	Neighborhood Services, City Manager's Office,
	improved coordination?	Homeless Engagement and Response Team,
		Property Maintenance and Code Enforcement,
		Community Relations.
2	Agency/Group/Organization	Spartanburg Housing
	Agency/Group/Organization Type	РНА
,	What section of the Plan was addressed	Housing Need Assessment
	by Consultation?	Public Housing Needs
	Briefly describe how the	Ongoing communication between organizations
	Agency/Group/Organization was	and review of their 5-year Consolidated and Annual
	consulted. What are the anticipated	Action Plan provides guidance to address housing
	outcomes of the consultation or areas for	
	outcomes of the consultation or areas for improved coordination?	needs and other supportive priorities.
	outcomes of the consultation or areas for improved coordination? Agency/Group/Organization	
3	improved coordination?	needs and other supportive priorities.
3	improved coordination? Agency/Group/Organization	needs and other supportive priorities. United Way of the Piedmont
3	improved coordination? Agency/Group/Organization	needs and other supportive priorities. United Way of the Piedmont Services - Housing
3	improved coordination? Agency/Group/Organization	needs and other supportive priorities. United Way of the Piedmont Services - Housing Services-Children
3	improved coordination? Agency/Group/Organization	needs and other supportive priorities. United Way of the Piedmont Services - Housing Services-Children Services-Elderly Persons
3	improved coordination? Agency/Group/Organization	needs and other supportive priorities. United Way of the Piedmont Services - Housing Services-Children Services-Elderly Persons Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	United Way of the Piedmont is a nonprofit organization that serves as a central resource center for available resources and services and invests in critical needs of the community. They are the lead agency of the Homeless Taskforce and Housing Opportunity Collaborative and have consolidated data from different agencies and organizations provide a housing market analysis and needs assessment. Ongoing communication and partnerships with the City provides guidance for the Annual Action Plan.
4	Agency/Group/Organization	Community Works Carolina
	Agency/Group/Organization Type	Services - Housing Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Works Carolina promotes homeownership for low and moderate income households in the City of Spartanburg and the County. Their programs include homebuyer downpayment assistance, home buying workshops, and financial education. Ongoing communication and partnerships provides guidance on the lowmoderate income households' housing, finance, and business needs.
5	Agency/Group/Organization	Northside Development Group
	Agency/Group/Organization Type	Housing Services - Housing Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Northside Development Group (NDG) is a nonprofit organization that is expanding opportunities for housing, economic development, and health in the Northside Neighborhood and residents in the Citywide. The Northside is a targeted area for CDBG/HOME funded activities. Ongoing communication and partnerships with NDG provides vital insight in assessing needs and facilitating development that benefits lowmoderate income households.
6	Agency/Group/Organization	Highland Neighborhood Association
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing communication with the Highland Neighborhood Association and through the quarterly Highland Working Group meetings advises the City and other local Stakeholders on community needs, challenges, and best practices for engagement and development. The Highland Neighborhood is a targeted area for CDBG/HOME funded activities. Their participation in the Highland Neighborhood Transformation Masterplan process has helped provide vital guidance for development in the neighborhood and services needed and desired by the community.
7	Agency/Group/Organization	Bethlehem Center
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Bethlehem Center serves as a resource and community engagement hub in the Highland Neighborhood. While the center primarily focuses on after-school and summer youth programs, it is also vital in facilitating community engagement to assess needs in the community, including families, youth, seniors, housing, and development. Ongoing communication and partnerships provide guidance on CDBG/HOME funded activities.
8	Agency/Group/Organization	SPARTANBURG COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing communication and partnerships with the Spartanburg County Community Development Department facilitates a joint effort to maximize the impact of CDBG and HOME funding in the City and County.
9	Agency/Group/Organization	Project R.E.S.T.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Project R.E.S.T. (formerly SAFE HOMES Rape Crisis) is a non-profit organization serving victims of domestic violence and sexual assault, including dependent children, in Spartanburg and Cherokee Counties. Services include emergency shelter, advocacy, and case management. Ongoing communication and partnerships guide the Annual Action Plan. Feedback from this organization includes: A lack of affordable housing units for women and families to transition into; a lack of shelter for homeless single women and women with children; major problems with substance abuse and mental health among folks seeking shelter; financial instability and poor housing records are often barriers for those seeking housing after being sheltered for abuse.
10	Agency/Group/Organization	SC Legal Services Spartanburg Office
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing Services - Legal Assistance
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	South Carolina Legal Services is a non-profit organization that provides free legal assistance in a variety of civil legal matters to eligible low-moderate income residents if South Carolina. Ongoing communication and partnerships provide guidance in understanding the myriad of housing problems faced by low-moderate income families including eviction, landlord/tenant rights, and housing education needs.
11	Agency/Group/Organization	SC Department of Health and Environmental Control (DHEC)
	Agency/Group/Organization Type	Services-Children Services-Health Health Agency Other government - State

What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Lead-based Paint Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	SC DHEC is the state health and environmental control agency. The City consults with DHEC on lead-based paint hazard reduction activities and housing needs to reduce child blood-lead levels.

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

N/A. There were no agencies intentionally not consulted.

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	United Housing Connections	The City and the CoC share the same goal to eliminate homelessness in the area. The goals in the plan address the needs of homeless persons and need for supportive services.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City actively collaborates with public entities and governmental bodies to efficiently oversee the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs, as well as develop the Consolidated Plan. The Spartanburg Neighborhood Services Director closely partners with the City's Planning Department and Public Works Department, alongside Spartanburg County offices, to coordinate and collaborate on strategic improvement projects. These initiatives encompass a range of considerations, including the integration of public services, infrastructure enhancement, housing repairs and rehabilitation, and various community improvements funded through CDBG and HOME initiatives. Code Enforcement is engaged to identify areas of slum and blight within the community.

The City actively collaborates with various governmental organizations and public entities through the Neighborhood Services Department, fostering coordination with key stakeholders such as the Spartanburg Housing Authority, the City of Spartanburg Finance Department, and the Appalachian Council

of Governments (ACOG). This collaborative effort aims to enhance communication and synergy in addressing community development initiatives.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The City of Spartanburg follows its adopted, HUD-approved Citizen Participation Plan (CPP). The CPP encourages citizen participation and involvement in all stages of the community planning process from the drafting of the 5-year Consolidated Plan, to preparation of the Annual Action Plans, filing of the Consolidated Annual Performance Evaluation Report (CAPER) and any substantial amendments to its plans. The City holds public meetings and hearings, makes copies of the plans available for review at the Neighborhood Services Department and on the City's website, and accepts and incorporates citizen input and feedback when finalizing the Consolidated Plan and first-year Annual Action Plan.

The Citizen Participation Plan process is designed to encourage all citizens, including persons with disabilities and in need of accommodations and persons who require language translation services to participate in determining housing and community development needs within their communities. Special encouragement is extended toward very low and low-income persons, particularly those in blighted areas, public housing, and other assisted housing. Citizen comments and questions are encouraged at all public meetings as the City works to include the needs of its residents in the Consolidate Plan goals.

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments not	
					accepted	
					and reasons	
1	Public	Non-	The Neighborhood Advisory Board held a	There no comments received.	All comments	
	Meeting	targeted/broad	meeting at the Spartanburg Police Department		were accepted.	
		community	at 206 North Forest St., Spartanburg, SC on			
			January 30, 2024 to discuss funding priorities			
			for the Consolidated Plan and AAP.			

2	Public	Non-	A public hearing was held to discuss the	The following comments and	All comments
	Hearing	targeted/broad	proposed PY 2024 AAP. The hearing was held in	questions were made at the public	were accepted.
		community	The Community Room at the Public Safety	hearing.	
			Building, 206 N Forest St, Spartanburg, SC		
			29301 on April 4, 2024 at 6:00 PM . For more	- Could a family with 2 children	
			information, please phone 864-580-5323 or	be approved with \$80,000	
			email: mlivingston@cityofspartanburg.org	income	
				- The amount of funds available	
				- Can funds be used to buy	
				multi-family units	
				 Does the City fund rentals 	
				- A request to show the list of	
				nonprofit applicants	
				 Has the registration process 	
				started	
				- Find and fund one	
				organization to address	
				homelessness, instead of	
				multiple	
				 Can the City get more funding 	
				 Why are Northside buildings 	
				only 3 stories?	
				 Does getting a loan through 	
				these program raise your	
				income level?	
				- Can individuals qualify for	
				more than one program?	
				- Has number of rentals	
				decreased?	

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments not	
					accepted	
					and reasons	
				- What is the minimum income		
				to participate in programs		
				- Can a family get funding		
				 Can organizations get funds? 		
				- Show how applicants are		
				selected		
				- A question if tiny homes		
				quality		

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments not	
					accepted	
					and reasons	
3	Public	Non-	A second public hearing will take place at	The following comments and	All comments	
	Hearing	targeted/broad community	Spartanburg County Council Chambers, 366 N Church St, Main Level, Suite 1000, Spartanburg, SC 29303 on April 16, 2024 at 6:00 PM. For more information, please phone 864-580-5323 or email: mlivingston@cityofspartanburg.org	questions were made at the public hearing. - Who are stakeholders - What does CDBG stand for? - How do nonprofits apply? - What is the Northside doing? - Where the affordable housing complex planned? - Availability of funds - What is the income limit and what happens if you are over - Affordable complexes will use 80 or 60 percent AMI? - Can rent at affordable housing be raised? - Why does Ellington have all the rules with restrictions? - How do nonprofits assist homeless veterans - Does everybody who requests get funding?	were accepted.	

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments not	
					accepted	
					and reasons	
4	Public	Non-	The public comment period is scheduled to be	No comments.	All comments	
	Comment	targeted/broad	held starting on March 27, 2024, through April		were accepted.	
	Period	community	27, 2024, and the proposed plan will be			
			available online at			
			https://www.cityofspartanburg.org, and at the			
			Neighborhood Services Department 187 W			
			Broad Street Spartanburg, SC 29306. Written			
			comments may be submitted to City of			
			Spartanburg Neighborhood Services at the			
			address above or by email at:			
			mlivingston@cityofspartanburg.org.			

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments not	
					accepted	
					and reasons	
5	Community	Non-	The City is conducting a community needs	There were 239 responses to the	All comments	
	Survey	targeted/broad	assessment and fair housing analysis as part of	community survey. The top priorities	were accepted.	
		community	its requirements to receiving federal	for the community were identified in		
			funding. The following link has been provided:	this order:		
			https://www.research.net/r/CityofSpartanburg-ConPlan	 Affordable Housing (new affordable rental and homeownership housing) Public Improvements (street improvements) Economic Development (public transportation) Demolition (demolition of dilapidated housing) Public Services (homeless services) 		

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	itreach Outreach response/attend		ance comments received		
					accepted	
					and reasons	
6	Stakeholder	Non-	The City conducted a stakeholder survey for	There were 30 responses to the	All comments	
	Survey	targeted/broad	local nonprofit agencies and government	stakeholder survey. The top priorities	were accepted.	
		community	departments.	for the community were identified in		
				this order:		
				Affordable Housing		
				2. Access to Affordable, Efficient,		
				and Reliable Public		
				Transportation		
				3. Supportive Services for Low-		
				Income Residents		
				4. Help for Nonprofits		
				5. Affordable Childcare		
7	Public	Non-	The City discussed the ConPlan and community	No comments.	All comments	
	Meeting	targeted/broad	needs at the Northside neighborhood		were accepted.	
		community	association meeting on February 19, 2024 at			
			6:00 PM at TK Gregg.			
8	Public	Non-	The City discussed the ConPlan and community	No comments.	All comments	
	Meeting	targeted/broad	needs at the Forest Park neighborhood		were accepted.	
		community	association meeting on February 26, 2024 at			
			5:30 PM at Willa Reeder.			
9	Public	Non-	The City discussed the ConPlan and community	No comments.	All comments	
	Meeting	targeted/broad	needs at the Highland neighborhood		were accepted.	
		community	association meeting on February 15, 2024 at			
			6:00 PM at Bethlehem Ct.			

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments not	
					accepted	
					and reasons	
10	Public	Non-	The City discussed the ConPlan and community	A the meeting members from the	All comments	
	Meeting	targeted/broad	needs at the Park Hills South neighborhood	public made comments and had the	were accepted.	
		community	association meeting on February 15, 2024 at	following questions:		
			6:00 PM at Temple Church.	 What were projects 		
				completed previously with		
				Federal funds.		
				 The eligibility of projects and 		
				activities were asked.		

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section assesses the housing needs in the City of Spartanburg by analyzing various demographic and economic indicators. To ensure the most efficient and effective use of resources the City must first assess the needs of the community. Developing a picture of the current needs in the City begins by looking at broad trends in population, area median income, number of households, and other economic and social indicators. The next step is to examine those data points with a more nuanced analysis of variables such as family and household dynamics, race, and housing problems.

A key goal of the Needs Assessment is to identify the nature and prevalence of housing problems experienced by the City's residents. The HUD-identified housing problems assessed are:

- Cost-burdened households
- Substandard housing
- Overcrowding

The area's public housing, homeless, and non-homeless special housing needs are also discussed. Finally, non-housing community development needs, such as public services and public facilities, are considered. Furthermore, these housing problems are compared to economic and demographic indicators to discern if certain groups carry a disproportionate burden.

The Needs Assessment provides a foundation for the rest of the Consolidated Plan. The information gathered and analyzed here helps set the priorities for both the Action Plan and Strategic Plan. It is necessary to understand how things have changed and how they stand now to make wise decisions about how to use resources in the future. Understanding the magnitude and prevalence of these issues in the varying communities in the City is crucial in setting evidence-based priorities for entitlement programs.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The housing needs of a community are, like all facets in the market economy, a product of supply and demand. However, determining the factors that impact supply and demand is much more complicated than building one house for one household. Changes in population, household size, availability of rental housing, income, and condition of a property are all factors that can shift the community's housing needs.

Within the City of Spartanburg overall, the population has grown slightly over the last decade. However, that growth has not occurred uniformly. Some areas have grown more quickly while others have seen a relatively significant population decrease. This population shift also identifies a shift in economic factors, with high poverty rates in some areas compared to others. This section looks at these differences and other important factors such as housing problems and particular populations in need of support.

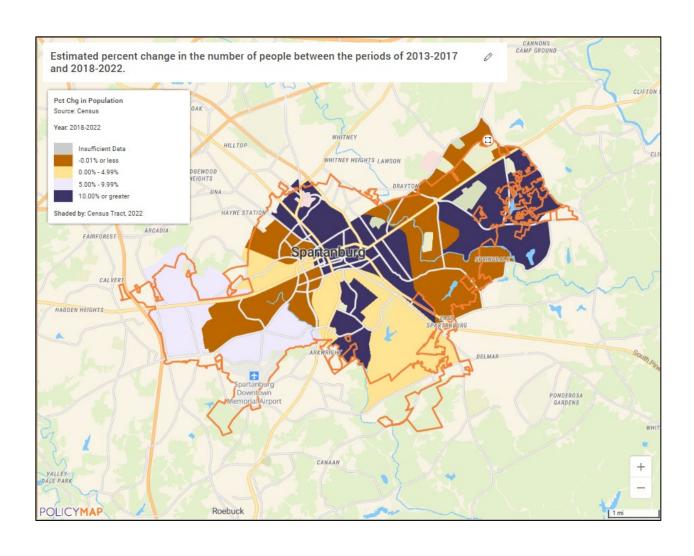
According to the most recent data, the jurisdiction has grown by approximately 3% since 2012. The number of households grew by the same rate of 3%. However, the median household income increased by 48%. However, when adjusted for inflation, the median income in 2012 had purchasing power of \$41,053.70. This means that the purchasing power in the City still increased, but by a much lower rate than the median income. Purchasing power increased by only 19.7%.

Demographics	Base Year: 2012	Most Recent Year: 2022	% Change
Population	37,333	38,301	3%
Households	15,182	15,587	3%
Median Income	33,098	49,140	48%

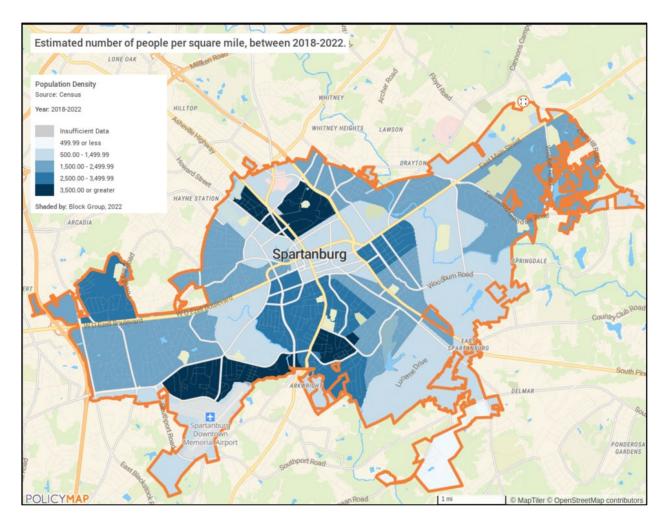
Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2018-2022 ACS (Most Recent Year)

In the last five years there has been a noticeable shift in population throughout the City. Many tracts saw relatively high growth of over 10%. These areas are often bordering tracts that saw a decline in overall population.



The following map shows the population density for the City. There does not appear to be a strong correlation between density and location, but there are some areas that are clearly more densely populated than others. The high-density tracts have over 3,500 people per square mile and low-density tracts have less than 1,500.



Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100%	>100% HAMFI
				HAMFI	
Total Households	3,200	1,825	2,730	1,655	5,905
Small Family Households	1245	565	930	585	2550
Large Family Households	155	194	150	64	280
Household contains at least one person	634	345	560	445	1685
62-74 years of age	034	343	300	443	1003
Household contains at least one person	254	385	500	175	550
age 75 or older	234	363	300	1/3	330
Households with one or more children 6	633	280	340	210	930
years old or younger	055	200	340	210	930

Table 6 - Total Households Table

Data 2016-2020 CHAS

Source:

The above table breaks down family dynamics and income in the jurisdiction using 2018-2022 CHAS data. Small families are more than nine times more prevalent than large family households, which follows the trend of smaller average household size in the region and the nation as a whole. There appears to be a correlation between household type and income. Large family households are less common among households earning 80% to 100% HAMFI than those earning less. Higher income households are also more likely to have someone over the age of 62 and are more likely to have a child 6 years or younger. This may point to a connection between income and household size and composition.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

			Renter					Owner		
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HO	JSEHOLD	S								
Substandard										
Housing -										
Lacking										
complete	4	80	45	20	149	30	0	0	0	30
plumbing or										
kitchen										
facilities										
Severely										
Overcrowded -										
With >1.51										
people per	25	0	0	25	Ε0					0
room (and	25	0	0	25	50	0	0	0	0	0
complete										
kitchen and										
plumbing)										
Overcrowded -										
With 1.01-1.5										
people per										
room (and	85	30	30	0	145	4	0	0	15	19
none of the										
above										
problems)										
Housing cost										
burden greater										
than 50% of										
income (and	1445	320	10	20	1795	305	165	105	40	615
none of the										
above										
problems)										

			Renter					Owner		
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost										
burden greater										
than 30% of										
income (and	225	430	555	140	1350	75	150	335	65	625
none of the										
above										
problems)										
Zero/negative										
Income (and										
none of the	265	0	0	0	265	65	0	0	0	65
above										
problems)										

Table 7 - Housing Problems Table

Data

2016-2020 CHAS

Source:

Housing cost burden is a common trend across the nation and is the most significant housing issue in the City. According to 2022 CHAS data, there were 3,145 renters and 1,240 homeowners in the 0% to 100% AMI (Area Median Income) range in the City spending more than 30% of their income on housing costs. CHAS data does not provide cost burden data for all income groups. However, the 2018 - 2022 ACS data can be used to determine how many households were cost burdened in all income groups. According to the 2018 - 2022 ACS data, 1,024 homeowners and 3,443 renters are cost burdened in the City.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

			Renter					Owner		
	0-	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	30%	50%	80%	100%		AMI	50%	80%	100%	
	AMI	AMI	AMI	AMI			AMI	AMI	AMI	
NUMBER OF H	OUSEH	OLDS								
Having 1 or										
more of four	1785	860	640	210	3495	415	320	440	120	1295
housing	1/63	800	040	210	3433	413	320	440	120	1293
problems										
Having none										
of four	380	395	680	720	2175	290	250	970	605	2115
housing	360	393	080	720	21/5	290	230	970	005	2115
problems										

	Renter				Owner					
	0-	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	30%	50%	80%	100%		AMI	50%	80%	100%	
	AMI	AMI	AMI	AMI			AMI	AMI	AMI	
Household										
has negative										
income, but										
none of the	265	0	0	0	265	65	0	0	0	65
other										
housing										
problems										

Table 8 - Housing Problems 2

Data

2016-2020 CHAS

Source:

Severe housing problems are significantly less common that standard housing problems, but they are still present in the City. In total, nearly 4,800 households in the City have a severe housing problem. They are particularly prevalent among 0-30% AMI renter households, which points to a relationship between income and severe cost burden.

3. Cost Burden > 30%

		Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
NUMBER OF HOUSE	HOLDS								
Small Related	180	110	365	655	165	35	280	480	
Large Related	0	105	25	130	0	4	105	109	
Elderly	115	120	75	310	120	150	320	590	
Other	85	65	245	395	4	20	95	119	
Total need by income	380	400	710	1490	289	209	800	1298	

Table 9 – Cost Burden > 30%

Data

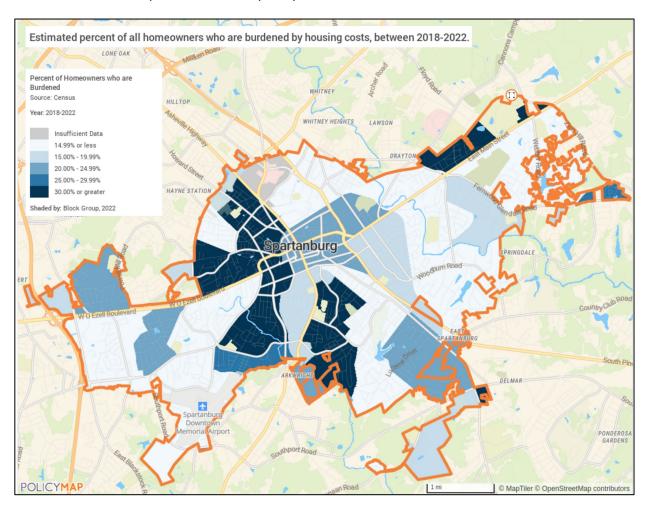
2016-20202 CHAS

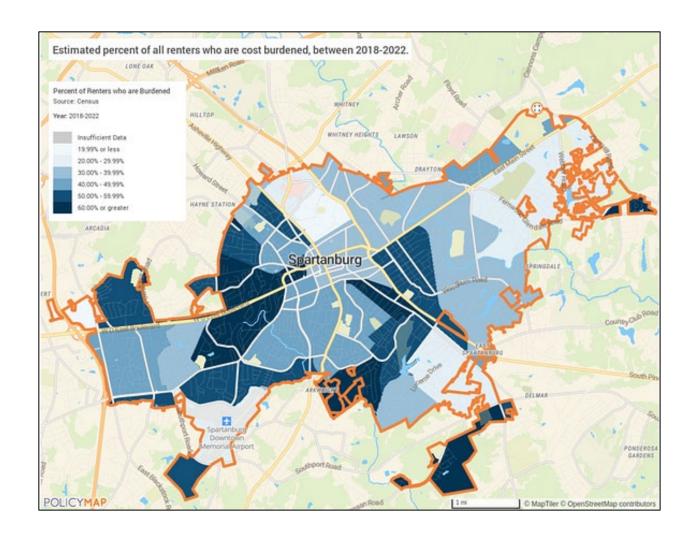
Source:

The table above displays 2018 CHAS data on cost burdened households in the City for the 0% to 80% AMI cohorts. There are 2,788 households that are cost burdened in the City, including renters and homeowners. The following maps display the percentage of the population who are cost burdened by census tract using data from the 2018 – 2022 American Community Survey 5-Year Estimates.

Cost burden is most common in the west side of the City for homeowners. In these tracts 30% or more of all households are cost burdened. There are many areas throughout the City that have a cost burden rate of half that, less than 15%.

Renters experience cost burden at higher rates than homeowners and the distribution of cost burdened households differ. High-cost burden tracts are more common for renters, and they can be found in the western and southern portions of the City. Very few tracts have a renter cost burden under 20%.





4. Cost Burden > 50%

·		Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
NUMBER OF HOUSE	HOLDS								
Small Related	545	110	0	655	85	100	0	185	
Large Related	105	105	0	210	15	0	0	15	
Elderly	300	120	0	420	120	40	0	160	
Other	520	120	10	650	85	4	90	179	
Total need by income	1470	455	10	1935	305	144	90	539	

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS

Source:

Severe Cost Burden

Severe cost burden is defined as paying more than 50% of household income on housing costs and severe cost burden is most common among extremely low-income households. More than 2,474 households spend half of their income on housing costs. These households are often put in the position of deciding whether to pay rent, purchase food, or pay for commute costs, or other essentials. These populations may be in desperate need of support in order to prevent homelessness.

5. Crowding (More than one person per room)

			Renter	•				Owner		
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS		7	7	7		7	7	7		
Single family households	110	10	30	25	175	4	0	0	4	8
Multiple, unrelated family households	0	20	0	0	20	0	0	0	10	10
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	110	30	30	25	195	4	0	0	14	18

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

Overcrowding

HUD defines an overcrowded household as one having from 1.01 to 1.50 occupants per room. A severely overcrowded household is considered to be one with more than 1.50 occupants per room. Overcrowding is less common than cost burden issues, but it is still present in over 200 households, most of which are renters. This supports information in the Market Analysis that shows there is a lack of rental units with three or more bedrooms, which means any family with three children or more will struggle to find housing that isn't overcrowded.

The following table shows the number of households with children present by income level.

	Renter				Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
Households with Children Present	600	210	115	925	33	70	225	328	

Table 12 - Crowding Information - 2/2

Data Source: 2016-2020 CHAS

Describe the number and type of single person households in need of housing assistance.

According to the 2018 – 2022 American Community Survey, there are 5,853 1-person households in the City. The primary group in need of housing assistance is renters, particularly those over the age of 65 due to higher poverty rates and fixed incomes. There are 915 residents who are retirement age renters who live alone and may need housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disability

According to 2018-2022 ACS data, there are 6,288 residents with disabilities in the City making up approximately 17% of the population. Approximately 1,548 of these residents are under the age of 18. The most common disability is ambulatory difficulty and over 3,100 report this difficulty. Residents with disabilities and families with children with disabilities face significant barriers to affordable housing. Most homes require expensive modifications in order to accommodate the needs of residents. An exact count of those in need of housing assistance is difficult to determine but it is likely the majority of residents with a disability either need housing assistance through financial support or need access to homes that meet their disability needs.

Violence

According to the City Police Department as reported by the FBI, there were 319 violent crime incidents in 2022. Aggravated assault was the most common violent crime, followed by robbery and rape. There were 37 rape offenses reported. Women are more likely to be victims of a violent crime and men are more likely to be the offender. Of the 37 rape incidents reported in 2022, 100% of offenders were male. Approximately 46% of rape incidents were committed against people between the ages of 10 and 19.

Rape offenses occurred in the home 59% of the time and the offender was most likely either an acquaintance (33% of the time) or intimate partner (19% of the time). Non-consensual sexual offenses have the lowest clearance rate of all violent crimes.

Sexual assault and other crimes intimate crimes are underreported. The Rape, Abuse, and Incest National Network (RAINN) states that only about 30% of sexual assault cases are reported to the police, with only 2.5% of cases ending in incarceration. If that is accurate then there were approximately 86 rape incidents that went unreported to the Spartanburg Police Department's jurisdiction. Considering the prevalence of sexual violence and the likelihood that violence will occur in the home and by a known person, it is imperative that survivors have access to housing and economic support to escape dangerous situations.

What are the most common housing problems?

The most common housing problem identified is cost burden. According to the most recent ACS data nearly 4,500 households are cost burdened. Renters are most likely to be cost burdened, and nearly 52% of renters pay more than 30% of their income to housing expenses. Homeowners are less likely to be cost burdened than renters, but it is still a significant problem. Approximately 22% of homeowners with a mortgage and over 12% of homeowners without a mortgage have a cost burden. This financial burden puts significant pressure on households and increase the likelihood of homelessness or insufficient living arrangements.

Are any populations/household types more affected than others by these problems?

Overall, household income is correlated with the likelihood that a household is impacted by housing problems, particularly for renters. Residents with lower incomes have increased rates of cost burden and other substandard living conditions. Additionally, residents with disabilities and those experiencing homelessness are particularly vulnerable to housing problems. A discussion of the prevalence of housing problems by race and ethnicity are discussed later in NA-15 to NA-30.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Very low-income households (those at or below 30% of the area median income) spending in excess of 50% of their income for gross rent (rent plus tenant-paid utilities) are particularly vulnerable to an unexpected financial or personal crisis which could lead to homelessness. Single-parent households with children are the most vulnerable. They have a greater need for affordable housing, accessible childcare, health care, and other supportive services. Because of lower incomes and higher living expenses, very low-income single-parent households are at imminent risk of becoming homeless. The major needs for these households are financial housing support and other supportive services such as financial education, job training, and affordable childcare.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not applicable.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Instability and increased risk of homelessness are associated with the lack of financial resources, temporarily living in the home of another person, imminent eviction, or living in a hotel/motel. Death of a family member, medical expenses or other unanticipated emergency expenditures, such as a major car

repair, can lead to an inability to pay rent and create an unstable living situation, particularly for families with low or fixed incomes. Few programs exist in South Carolina to assist those exiting an institution such as prison and jail or mental health facilities, or aging out of foster care. Domestic violence, abandonment by a spouse, mental illnesses, and drug or alcohol addictions play a role locally in increased risk of homelessness. Other areas that could impact stability are prolonged unemployment or impacts related to COVID-19. Additionally, in the southeastern United States, the risk of hurricanes and other natural disasters can increase the risk of homelessness. The destruction of a disaster can instantly put a family into a precarious housing situation.

Discussion

Needs Assessment by Housing Type

Using the CHAS data provided in this section, data from the ACS 5-Year estimates, as well as other local data, the City can identify the number of LMI households and vulnerable household types that may need housing assistance. Unfortunately, due to funding limitations the City may not be able to assist all household types but may use the data collected to prioritize assistance. See below estimates for households that may need housing assistance by family type:

Extremely Low-Income Households (0-30% AMI): The CHAS data indicates that there are 3,200 extremely low-income households in the City. Extremely low-income households make up over 41% of LMI households in City of Spartanburg.

Very Low-income Households (30-50% AMI): The CHAS data indicates that there are 1,825 very low-income households in the City, which is 23.5% of all LMI households in the City.

Low-Income Households (50-80% AMI): The CHAS data indicates that there are 2,730 low-income households in the City, which is 35.2% of all LMI households in the City.

Low-Income Small Families (no more than 4 person): The CHAS data indicates that there are 2,740 LMI small family households in the City, which is 46.6% of this family type. LMI includes extremely low-, low-and moderate income.

Low-Income Large Families (5 or more persons): The CHAS data indicates that there are 499 LMI large family households in the City, which is 59.2% of this cohort. LMI includes extremely low-, low- and moderate income.

Cost Burdened Renters: Renters that need housing assistance are those that are LMI and cost burdened. HUD defines cost-burden as paying more than 30% monthly income on housing costs. According to CHAS data, there are 3,425 LMI renter households that are cost burdened.

Cost Burdened Owners: Homeowners in need of housing assistance are those that are LMI and cost burdened. According to CHAS data, there are 1,837 LMI homeowners that are cost burdened.

Single-Person Households: According to the 2018-2022 American Community Survey (S2501) there are 5,853 one-person households in the City of Spartanburg, which is 37.6% of all households.

Public Housing Residents: Spartanburg Housing operates public housing and HCV housing vouchers in the City of Spartanburg. Public housing provides decent and safe rental housing for eligible LMI families, the elderly, and persons with disabilities. There are currently 1,085 public housing units and 1,659 housing vouchers in use. Accessibility for persons with a disability is a concern for eligible households. Additional details on the public housing population including demographics and need for accessibility can be found in NA-35.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A review of Housing Assessment data provided by HUD helps to determine whether any racial or ethnic groups may have a disproportionately greater housing need than other ethnic groups in the City. HUD has determined that a disproportionately greater need exists when the percentage of persons in a given income category is at least 10 percentage points higher than the category as a whole.

In this section, the tables show the prevalence of standard Housing Problems. A Housing Problem is defined as one or more of four things:

- 1. Lacks complete kitchen facilities,
- 2. Lacks complete plumbing facilities,
- 3. More than one occupant per room, and
- 4. Cost burden greater than 30%.

In most communities the most prevalent housing problem is housing cost burden.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2200	1000	0
White	535	400	0
Black / African American	1440	575	0
Asian	20	40	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	154	10	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1180	645	0
White	290	245	0
Black / African American	885	345	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	40	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data

2016-2020 CHAS

Source:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1080	1650	0
White	430	730	0
Black / African American	590	840	0
Asian	8	35	0
American Indian, Alaska Native	0	24	0
Pacific Islander	0	0	0
Hispanic	35	14	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data

2016-2020 CHAS

Source:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

^{*}The four housing problems are:

^{*}The four housing problems are:

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	330	1325	0
White	165	530	0
Black / African American	140	630	0
Asian	15	19	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	105	105	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data

2016-2020 CHAS

Source:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

Extremely Low-Income (0-30% AMI)

The jurisdiction-wide housing problem rate in this income group is 68.8%. There are two groups that are disproportionately impacted: American Indian/Alaska Native and Hispanic. One hundred percent of American Indian/Alaska Native households reported a housing problem in this income group.

Very Low-Income (30-50% AMI)

In this income group 64.7% of households report a housing problem. There are no groups that are disproportionately impacted.

Low-Income (50-80% AMI)

Approximately 39.6% of households in this income group have a housing problem. Hispanic households are the only group in this income range that are disproportionately impacted.

Moderate Income (80-100% AMI)

This income group reports 19.9% of households with a housing problem. There are two groups in this income range that are disproportionately impacted by housing problems: Asian and Hispanic households.

^{*}The four housing problems are:

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A review of Housing Assessment data provided by HUD helps to determine whether any racial or ethnic groups may have a disproportionately greater housing need than other ethnic groups in the City. HUD has determined that a disproportionately greater need exists when the percentage of persons in a given income category is at least 10 percentage points higher than the category as a whole.

This section shows data on Severe Housing Problems, which include:

- 1. Households that lack complete kitchen facilities,
- 2. Lack complete plumbing facilities,
- 3. More than 1.5 persons per room, and
- 4. Cost burden over 50%

Households with one or more of these criteria are considered to have a severe housing problem.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1900	1300	0
White	440	495	0
Black / African American	1255	760	0
Asian	20	40	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	154	10	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	600	1225	0
White	165	370	0
Black / African American	425	805	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	40	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2016-2020 CHAS

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	190	2540	0
White	145	1010	0
Black / African American	30	1400	0
Asian	4	40	0
American Indian, Alaska Native	0	24	0
Pacific Islander	0	0	0
Hispanic	0	49	0

Table 19 - Severe Housing Problems 50 - 80% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

^{*}The four severe housing problems are:

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	125	1530	0
White	45	650	0
Black / African American	70	695	0
Asian	10	24	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	70	120	0

Table 20 - Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

Source

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

Extremely Low-Income (0-30% AMI)

The jurisdiction-wide severe housing problem rate in this income group is 59.4%. There are two groups that are disproportionately impacted by severe housing problems: American Indian/Alaska Native and Hispanic. One hundred percent of American Indian/Alaska Native households and 94% of Hispanic households reported a severe housing problem in this income group.

Very Low-Income (30-50% AMI)

In this income group 32.9% of households report a severe housing problem. There are no groups that are disproportionately impacted.

Low-Income (50-80% AMI)

Approximately 7% of households in this income group have a severe housing problem. There are no groups that are disproportionately impacted.

Moderate Income (80-100% AMI)

^{*}The four severe housing problems are:

This income group reports 7.6% of households with a severe housing problem. There are two groups in this income range that are disproportionately impacted by severe housing problems: Asian and Hispanic households.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The following section analyzes HUD data on a specific housing problem, Cost Burden, and determines whether any racial or ethnic groups are disproportionately impacted. Cost Burden is identified as any household that spends more than 30% of its income on housing costs, and Severe Cost Burden is a household that spends 50% or more of their income on housing costs. As with the previous sections, HUD has determined that a proportionally higher need exists when the percentage of persons in each category is at least 10 percentage points higher than the overall percentage of persons in the category.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10213	2243	2538	334
White	5745	770	705	125
Black / African American	3740	1365	1630	195
Asian	175	8	24	4
American Indian, Alaska Native	39	0	10	0
Pacific Islander	4	0	0	0
Hispanic	350	45	154	10

Table 21 - Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS

Source:

Discussion:

By HUD's definition of disproportionate impact as any group that has 10% or higher than the overall rate of cost burden and severe cost burden, only one group is disproportionately impacted by severe cost burden.

Cost Burden (30-50%)

Approximately 14.6% of households in the City pay between 30% and 50% of their income to housing costs. No groups are disproportionately impacted by cost burden.

Severe Cost Burden (50% or more)

Throughout the City, 16.6% of households report severe cost burden. The only group disproportionately impacted by severe cost burden is Hispanic households. Approximately 27.5% of households in this group are severely cost burdened.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Overall, it is relatively rare for a group to be disproportionately impacted by housing problems due to race or ethnicity. However, Asian, American Indian or Alaska Native, and Black or African American households are all disproportionately impacted in multiple income groups.

Disproportionate Housing Problems:

• Extremely Low Income: American Indian or Alaska Native and Hispanic

Very Low Income: NoneLow Income: Hispanic

• Moderate Income: Asian and Hispanic

Disproportionate Severe Housing Problems:

Extremely Low Income: American Indian or Alaska Native and Hispanic

• Very Low Income: None

• Low Income: None

• Moderate Income: Asian and Hispanic

Cost Burden: None

Extreme Cost Burden: Hispanic

If they have needs not identified above, what are those needs?

No additional needs were identified that disproportionately impact households based on race or ethnicity. Household income is the primary indicator for both housing and non-housing problems. Additional information can be found throughout the ConPlan, including in NA-35, which describes public and assisted housing needs by race and ethnicity, and MA-50 which describes disparities in housing locations and income.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The available data shows that there are relatively low numbers of American Indian or Alaska Native, Hispanic, and Asian residents throughout the City with no concentrations of these minority groups in any specific areas. A complete analysis of the relationship between race and ethnicity and geography is discussed in MA-50.

NA-35 Public Housing – 91.205(b)

Introduction

Public housing was established to provide decent and safe rental housing for eligible low- and moderate-income families, the elderly, and persons with disabilities. Public housing includes federally subsidized, affordable housing that is owned and operated by the public housing authorities. In the City of Spartanburg, these services are overseen by the Spartanburg Housing (SH), whose mission is to "Develop, manage, and provide diverse, quality housing and programs to promote self-sufficiency." SH currently manages approximately 1,085 Public Housing units spread across Spartanburg. These units vary in size and type, ranging from duplexes, garden-style apartments, and townhouses of various bedroom sizes to high-rise apartments designed for elderly families.

Furthermore, SH administers over 1,650 Housing Choice Vouchers (HCV) within its service area. Over 190 of the vouchers are project based and 1,420 are tenant based. Under the HCV program, tenants contribute 30% of their income towards rent, with SH subsidizing the difference up to the Authority's payment standard. SH determines a payment standard that is the amount generally needed to rent a moderately-priced dwelling unit in the local housing market.

To support the self-sufficiency of low-income families, SH offers the Family Self-Sufficiency Program (FSS). This program is designed to empower low-income families, helping them achieve an improved standard of living and fostering self-sufficiency. Participants commit to a five-year contract outlining specific goals, including first-time employment, higher education, the establishment of a self-sustaining environment, and the opportunity to create an interest-bearing escrow account. Upon successfully completing the FSS program and remaining free of public aid for 12 months, the escrow account becomes accessible to the family.

More information about the SHA can be found at https://www.shasc.org/about_spartanburg_housing or by contacting SHA at 864-598-6000.

The tables below provide details on public housing programs and units in Spartanburg, along with demographic information pertaining to residents benefiting from public housing services.

Totals in Use

	Program Type										
	Certificate	Mod- Rehab	Public Housing	Vouchers Total	Project -	Tenant -	Special Purpose Voucher				
		Kellab	Tiousing	Total	based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *		
# of units vouchers in use	0	290	1,085	1,659	194	1,420	0	0	0		

Table 22 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

Characteristics of Residents

			Progra	т Туре				
	Certificate Mod- Public		Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Special Purp	ose Voucher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	5,244	8,307	11,341	9,874	11,348	0	0
Average length of stay	0	2	4	4	1	4	0	0
Average Household size	0	1	2	2	2	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants								
(>62)	0	15	176	304	27	271	0	0
# of Disabled Families	0	55	272	431	28	396	0	0

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Program Type										
	Certificate	Mod-	Public	Vouchers						
		Rehab	Housing	Total	Project -	Tenant -	Special Purp	ose Voucher		
					based	based	Veterans Affairs Supportive Housing	Family Unification Program		
# of Families requesting										
accessibility features	0	290	1,085	1,659	194	1,420	0	0		
# of HIV/AIDS program										
participants	0	0	0	0	0	0	0	0		
# of DV victims	0	0	0	0	0	0	0	0		

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

			[Program Type					
Race	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project -	Tenant -	Speci	al Purpose Vo	ucher
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	25	172	343	22	314	0	0	0
Black/African American	0	264	902	1,310	172	1,100	0	0	0
Asian	0	0	4	0	0	0	0	0	0
American Indian/Alaska									
Native	0	1	6	5	0	5	0	0	0
Pacific Islander	0	0	1	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type											
Certificate	Mod-	Public	Vouchers								
	Rehab	Housing	Total	Project -	Tenant -	Speci	al Purpose Vo	ucher			
				based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *			
0	3	9	17	3	13	0	0	0			
0	287	1,076	1,642	191	1,407	0	0	0			
	Certificate 0 0	Rehab 0 3	Rehab Housing 0 3 9	Certificate Mod-Rehab Public Housing Total 0 3 9 17	Certificate Mod-Rehab Housing Vouchers Total Project - based 0 3 9 17 3	Certificate Mod-Rehab Public Housing Vouchers Total Project - based Tenant - based 0 3 9 17 3 13	Certificate Mod-Rehab Housing Housing Total Project - based Veterans Affairs Supportive Housing 0 3 9 17 3 13 0	Certificate Mod-Rehab Housing Housing Total Project - based Dased Post-Based Post-Based Project - based Post-Based Project - based Post-Based Project - based Post-Based Project - based Post-Based Po			

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As depicted in the table titled "Characteristics of Public Housing Residents by Program Type," a notable segment of both public housing and voucher tenants consists of elderly individuals and families with disabilities. Approximately 25% of public housing tenants and 26% of voucher recipients are comprised of families with at least one member having a disability. Additionally, elderly individuals represent 16% of public housing residents and 18% of voucher recipients.

SH ensures compliance with the Americans with Disabilities Act (ADA) by ensuring that 5% of its housing inventory meets accessibility requirements. Additionally, SH prioritizes disabled households on both the public housing and Housing Choice Voucher (HCV) waiting lists. Upon request, reasonable accommodations are provided to applicants, residents, and participants. Specific needs are addressed after applicants are selected from the waiting list. Demand for accessible units remains high, with all public housing tenants and voucher recipients requesting units with accessibility features.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate needs of Public Housing residents and Housing Choice Voucher holders are affordable, decent, safe, and sanitary housing. Once households secure housing, it is important that they identify pathways to financial independence. This means that public housing must be located close to economic opportunities, educational facilities, and a robust public transportation system. There is also a need for affordable access to low-poverty neighborhoods.

Spartanburg Housing (SA) is dedicated to addressing the needs of low-income, very low-income, and extremely low-income families within the City of Spartanburg through various programs, including the Asset Management Program, Housing Choice Voucher (HCV) Program, Mod Rehab Program, and other Affordable/Moderate Income Programs, as well as HUD's Rental Assistance Demonstration (RAD) program.

The demand for affordable housing programs administered by SH remains substantial, evidenced by high occupancy rates in assisted housing units and the response to waitlist openings for Public Housing, HCV, and Affordable Housing programs within the jurisdiction. Since the demand for housing assistance often exceeds the limited resources available to HUD and the local housing agencies, long waiting periods are common. In 2022 SH reopened the HCV waiting list. However, there continues to be a shortage of landlords within the City and throughout the County that are willing to accept vouchers.

How do these needs compare to the housing needs of the population at large

In general, the broader population has greater wealth and better access to housing opportunities compared to individuals living in publicly supported housing. Public housing tenants and Housing Choice Voucher holders typically have lower incomes, as eligibility requirements include low-income status. The

average annual income for public housing residents is \$8,307 and \$11,341 for voucher holders. This is notably lower than the 2018–2022 ACS-estimated median household income of \$49,140 for City residents. At the income level of public housing residents and voucher holders, even paying no more than 30% of their income for housing costs, public housing residents and voucher holders have minimal remaining income to cover essential expenses such as food, clothing, and transportation.

The significant income disparity highlights a pressing need for additional affordable housing solutions within the City, particularly those strategically located near essential community resources such as grocery stores, medical facilities, and reliable transportation services. For individuals and families reliant on fixed or low incomes, the availability of such resources is important, as they face limited options for accessing these necessities. While the broader population shares similar needs, the demand for affordable and accessible housing is notably higher among those utilizing publicly supported housing and Housing Choice Vouchers.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homelessness is a complex issue that most communities across the United States must address. A major reason that homelessness is difficult to address is that it has many causes with overlapping and interrelated variables. The cause of any single person's homelessness often lies, not in a single factor, but at the convergence of many events and conditions. From one perspective, homelessness is an economic problem caused by unemployment, lack of affordable housing options, or poverty. From another perspective, homelessness is a health issue because many homeless persons struggle with mental illness, physical disabilities, HIV/AIDS, substance abuse, or a combination of those health factors. A third perspective is to view homelessness as a social problem with factors such as domestic violence, educational attainment, and race. Homelessness can be caused by all of these issues, and they are often interrelated. Due to this complexity, addressing homelessness requires a collaborative and community-based approach with multiple programmatic solutions that vary based on a person's level of need.

The Stewart B. McKinney Homeless Assistance Act defines the term "homeless", "homeless individual", and "homeless person" as:

- (1) an individual or family who lacks a fixed, regular, and adequate nighttime residence;
- (2) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- (3) an individual or family living in a supervised publicly or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
- (4) an individual or family who resided in a shelter or place not meant for human habitation and who is exiting an institution that provides a temporary residence;
- (5) an individual or family who:
 - (A) who will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations;
 - (B) has no subsequent residence identified; and
 - (C) lacks the resources or support networks needed to obtain other permanent housing; and
- (6) unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statues who:
 - (A) have experienced a long-term period without living independently in permanent housing;

The data for this section comes from the Upstate Continuum of Care, SC-501 (Upstate CoC) 2023 Point-in-Time (PIT) Count. The PIT Count allows communities to gain a snapshot of local homelessness "on any given night". It is important to note that the annual PIT Count is designed to provide a snapshot of local

homelessness on a single night and does not indicate the total number of persons experiencing homelessness in a given year. Additionally, the data provided in the tables below are at the CoC level, meaning this dataset is not limited to the City Spartanburg, but the 13 counties that make up the Upstate CoC.

The Upstate CoC 2023 PIT Count provides some limited data points for Spartanburg County; however, no data is available strictly at the City level. This data allows us to have a better understanding of the scope of homelessness at a more localized level.

- Total of 232 persons experiencing homelessness (Countywide)
 - o 187 persons experiencing sheltered homelessness
 - o 45 persons experiencing unsheltered homelessness
 - 129 White (56%); 86 Black, African, or African American (37%); 14 Multi-racial (6%); 2
 Asian or Asian American; 1 refused or unknown
- 14 Veterans
- 70 chronically homeless persons
- 50 survivors of domestic violence
- 126 homeless persons have a disabling condition

The table below provides data at the CoC level.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	225	13	N/A	N/A	N/A	N/A
Persons in Households with Only Children	4	2	N/A	N/A	N/A	N/A
Persons in Households with Only Adults	819	361	N/A	N/A	N/A	N/A

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness	
	Sheltered	Unsheltered					
Chronically							
Homeless	172	136	N/A	N/A	N/A	N/A	
Individuals							
Chronically							
Homeless	10	0	N/A	N/A	N/A	N/A	
Families							
Veterans	75	29	N/A	N/A	N/A	N/A	
Unaccompanied	20	10	N1/A	NI/A	N1/A	N1/A	
Child	39	10	N/A	N/A	N/A	N/A	
Persons with	10	3	N/A	N/A	N/A	N/A	
HIV	10	3	IN/A	IN/A	IN/A	N/A	

Table 26 - Homeless Needs Assessment

Data Source Comments:

HUD 2023 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Chronically Homeless – Persons are experiencing chronic homelessness if they have a disabling condition and have been consecutively experiencing homelessness for one year or more or had four separate episodes of homelessness in the last three years, totaling twelve months. In 2023, 70 individuals counted on the night of the PIT were chronically homeless in Spartanburg County. These are the most vulnerable residents experiencing homelessness and face the most barriers in obtaining permanent housing.

Families with Children – Households that include at least one adult and one person under the age of 18 are considered a family with children. Children raised experiencing homelessness are likely to experience housing instability into adulthood. During the 2023 PIT Count, 18 families with children were counted in Spartanburg County.

Veterans – Providing additional resources and support specifically targeted to Veterans experiencing homelessness is a priority for communities across the country. During the 2023 PIT Count, there were 14 veterans experiencing homelessness in Spartanburg County.

Unaccompanied Youth – Individuals who are between the ages of 18 and 24 years old that lack a fixed, regular, nighttime residence are considered unaccompanied youth. Across the CoC's region 49 unaccompanied youth were counted during the 2023 PIT Count.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	59	9 235
Black or African American	40	00 121
Asian		3 0
American Indian or Alaska		
Native		6 4
Pacific Islander		2 2
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	ī	12
Not Hispanic	99	364

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The 2023 Point-in-Time (PIT) Count identified 225 total persons in families experiencing sheltered homelessness and 13 total persons experiencing unsheltered homelessness throughout the CoC region on the night of the count. Of the total number of people in families experiencing sheltered homelessness, 85 were adults (18+) and 140 were children (under 18). Of the total number of people in families experiencing unsheltered homelessness, 7 were adults (18+) and 6 were children (under 18). The information reported by the Upstate CoC does not provide data on families of veterans experiencing homelessness.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

For the unsheltered population, White residents are the most common and account for 62.5% (235 persons) of the population. Only 3.2% of the unsheltered population identifies as Hispanic.

Sheltered residents have a similar racial background. White residents are the most common with a plurality, 57.2% (599 persons) and Black or African American residents represent 38.2% (400 persons). Similar to the unsheltered population, a relatively small amount of sheltered homeless identify as Hispanic, 4.9%.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Most people facing homelessness in the region are sheltered. There is a total of 1,048 sheltered and 376 unsheltered persons throughout the CoC region experiencing homelessness on any given night. Households with Children make up 21.5% of sheltered households and 3.5% of unsheltered households. It is also likely that there are additional individuals experiencing unsheltered homelessness that were not

able to be counted during the PIT Count since it can be challenging to locate persons experiencing unsheltered homelessness.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section describes the needs of individuals with special needs who are not experiencing homelessness but require supportive services to avert potential homelessness. Within the City, there are four principal groups with non-homeless special needs: the elderly and frail elderly, those affected by HIV/AIDS and their families, those grappling with alcohol and/or drug addiction, and those with mental and physical disabilities. Typically, members of these special needs populations possess fixed, limited incomes. While data on these populations is limited, there exists a notable demand for housing and/or supportive services across all special need populations, emphasizing the critical nature of addressing these needs. This section aims to define these groups, outline their needs, and expound on how the City is currently or should be addressing those needs.

Describe the characteristics of special needs populations in your community:

Elderly: According to the most recent data available, there are approximately 9,030 residents over the age of 60 in the City, making up 23.6% of the population. Approximately 3,247 residents over the age of 60 have a disability, or 37.2%, and over 1,160 (13.3%) are below the poverty level. Elderly residents are much more likely to live in owner-occupied residences than renter occupied residences, 68.2% and 31.8%, respectively. However, many elderly residents are cost burdened. Over 55% of renters and 17.2% of homeowners pay over 30% of their income to housing costs.

Source: American Community Survey 5-Year Estimates 2018-2022, S0102

The elderly population faces increased challenges and providing decent, affordable housing is incredibly important. It is medically beneficial and emotionally comforting for this population to remain in a familiar setting and, as a result, strong emphasis is placed on the elderly maintaining a lifestyle that is as independent as possible. Unfortunately, the elderly population is often on a limited income and/or has a disability, which puts financial pressure on them and reduces independence. As prices throughout the community inflate, the elderly population generally lacks the ability to increase their income to match.

HIV/AIDS: See discussion below.

Alcohol and Drug Addiction: Gathering accurate data about alcohol and drug addiction within a community is difficult. Addiction often goes unrecognized because people don't seek help. Only when someone overdoses, gets arrested, or seeks treatment are they counted in statistics. The South Carolina Department of Alcohol and Other Drug Abuse Services (DAODAS) attempts to keep track of addiction within communities by tracking patient demographics.

According to the S.C. Department of Alcohol and Other Drug Abuse Services (DAODAS), Spartanburg County ranks 32nd in alcohol abuse, 15th in nicotine use, and 10th in opioid Use out of 46 counties. Comparatively, in 2021 Spartanburg County ranked 33rd in alcohol abuse, 10th in nicotine use, and 17th in

opioid use. Alcohol use is the most commonly abused substance. Over 10% of the adult population binge drinks and 5.4% have classified their use as heavy.

Spartanburg County, like many counties across the nation, is facing an opioid epidemic and the problem is growing. From 2021 to 2022, EMS naloxone administrations rose by 58% and opioid overdose deaths rose by 46%. Due to heroin and other opioid use often requiring the use of needles, communities that lack safe injection sites for individuals with addictions generally see a larger increase in cases of HIV/AIDS and Hepatitis C.

Disability: There are 6,288 people in the City of Spartanburg who have a disability, which is 16.6% of the population. Among the disabled population, approximately 56% are Black, non-Hispanic, and 38.6% are White, non-Hispanic. Unsurprisingly, disability is correlated with age and older residents are more likely to have one or more disabilities. The primary disability is ambulatory difficulty, followed by cognitive difficulty as the second most prevalent impairment.

Source: 2018-2022 American Community 5-Year Estimates S1810

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly: Ensuring a secure, cost-effective, and stable housing infrastructure for the elderly is crucial. Various factors, such as access to healthcare, shopping facilities, and social networks, contribute to creating a conducive environment for their well-being. A robust public transportation system plays a pivotal role in supporting the elderly to maintain an active and independent lifestyle. Furthermore, modifications may be required in the homes of elderly residents to address any disabilities that may arise due to the aging process.

Alcohol and Drug Addiction: Individuals grappling with substance abuse require a strong support network to maintain their well-being and sobriety. Their housing needs include environments conducive to sobriety, employment assistance, proximity to health facilities, and convenient access to family, friends, and other social networks. Moreover, detoxification facilities are imperative upon the first identification of addiction.

Disability: Individuals with developmental disabilities exhibit diverse skill levels and abilities, presenting challenges similar to those faced by the general population. However, their unique needs stem from their distinct capabilities. Typically, individuals with disabilities have a fixed income and encounter limited housing alternatives. Those possessing greater independent skills often utilize subsidized housing, while those necessitating more assistance find accommodation in community homes funded by public welfare or privately-owned personal care settings. A considerable number of individuals with developmental disabilities continue to reside with their families into adulthood. Regardless of the housing arrangement, a consistent requirement is the provision of ongoing support services tailored to their specific capabilities.

HIV/AIDS: See discussion below.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

South Carolina ranks 11th in the nation for AIDS case rates. Spartanburg County, reflective of the broader trend across the state, is significantly affected by the HIV/AIDS epidemic. Among the 46 counties in South Carolina, Spartanburg County is ranked 12th in terms of HIV/AIDS case rates, as per the surveillance reports from the South Carolina Department of Health and Environmental Control (SCDHEC).

The 2020 State, County, and Public Health Region Report, published by SCDHEC, indicates that the HIV prevalence rate in Spartanburg County is 258.7 per 100,000 persons. The demographic distribution of individuals with HIV is predominantly comprised of Black males, with the largest age group being 50-59 years old, constituting 29% of the affected population.

There are multiple risk groups that are reported through SCDHEC. These groups, with accompanying cases reported are:

- Male Sex w/Male 394
- Injection Drug Use 58
- MSM and Injection Drug Use 21
- Heterosexual 180
- Other/Undetermined 180

In the 2021 report published by the South Carolina Department of Health and Environmental Control (DHEC) titled, "Ending the HIV Epidemic," various barriers and service needs for individuals with HIV/AIDS were identified. These include:

- 1. **Transportation Challenges:** Difficulties in access to transportation hinder the ability of persons with HIV/AIDS to reach essential services.
- 2. **Limited Accessibility to Prevention and Care Services:** A lack of convenient access to crucial prevention and care services poses a significant obstacle for individuals affected by HIV/AIDS.
- 3. **Educational Gaps:** Insufficient education about HIV/AIDS contributes to challenges in prevention and care, emphasizing the need for improved awareness and knowledge dissemination.
- 4. **Customer Care Issues in Care Efforts:** Concerns regarding the quality of customer care within the context of HIV/AIDS care efforts were highlighted as a barrier to effective support.
- 5. **Underlying Issues:** Various underlying issues such as mental health challenges, substance abuse, and housing instability were identified as factors complicating the overall well-being and management of individuals with HIV/AIDS. Addressing these underlying issues is crucial for comprehensive care.

The report underscores the importance of addressing these barriers and meeting the identified service needs to enhance the overall effectiveness of HIV/AIDS prevention and care efforts.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not applicable. The City does not plan to fund TBRA activities with HOME program funds.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The City of Spartanburg's growing population requires accessible and well maintained neighborhood spaces and facilities for special needs populations and LMI areas. throughout the City.

In response to this need, the City has added a goal in its Strategic Plan over the next five years of the Consolidated Plan:

1B. Improve & Expand Access to Public Facilities

Under Goal 1B: "Improve & Expand Access to Public Facilities," the City aims to address specific deficiencies in public facilities. This includes prioritizing improved access for elderly and disabled residents by implementing necessary accommodations. There is a concerted effort to target public facilities in low-income areas, which serve as crucial hubs for delivering essential public services such as workforce development training, childcare, services for the elderly, and other vital community programs. Additionally the City's 2022 Comprehensive Plan identified a need for expanded broadband internet access.

The City has forged successful partnerships with a diverse array of stakeholders, including local government agencies, housing providers, service organizations, non-profits, and community groups. These collaborative efforts facilitate a comprehensive understanding of the needs and priorities concerning public facilities across Spartanburg.

How were these needs determined?

The determination of priority needs in the City of Spartanburg was a result of a thorough and inclusive community engagement process, coupled with a comprehensive needs assessment conducted by the City. Through collaborative efforts, input was gathered from residents, homeless service providers, nonprofit organizations, and other local community development stakeholders. A key component of this process was a comprehensive community survey, which served as a platform for residents to voice their concerns and preferences regarding public facility improvements.

The City collaborates closely with both public and private agencies. This collaborative effort involves the identification and prioritization of community needs, the development of effective strategies and action plans, and the identification of available community resources.

Describe the jurisdiction's need for Public Improvements:

Spartanburg's infrastructure needs have morphed over time and will continue to do so. Changes in the economy, consumer preferences and lifestyle choices all impact how Spartanburg should plan for and invest in future infrastructure. The City's public infrastructure, consisting of streets, sidewalks, water mains, sewers, and buildings all require regular maintenance and investment to remain functional. The City will prioritize the need for improvements to infrastructure in LMI areas of Spartanburg.

The City's 2022 Comprehensive Plan references the need for increased investment in water-related infrastructure including, replacement of water and sewer piping, transition to trenchless piping, improved stormwater management, reduction in solid waste, and increased recycling. It is in the City's best interest to provide the infrastructure needed to meet existing community needs and to plan for and support future opportunities.

To address these pressing needs, the City has incorporated a goal into its Strategic Plan for the next five years as part of the Consolidated Plan:

1A: Improve & Expand Public Infrastructure

This strategic goal outlines the City's proactive approach to bolstering infrastructure resilience and functionality, aligning with the long-term interests and safety of Spartanburg's residents. Activities may include ADA compliance for curb ramps, streets, sidewalks, and roadway safety projects.

How were these needs determined?

The determination of priority needs in the City of Spartanburg was a result of a thorough and inclusive community engagement process, coupled with a comprehensive needs assessment conducted by the City. Through collaborative efforts, input was gathered from residents, housing service providers, and other local community development stakeholders. A key component of this process was a comprehensive community survey, which served as a platform for residents to voice their concerns and preferences regarding public infrastructure improvements. The City's 2022 Comprehensive plan was also referenced.

The City collaborates closely with both public and private agencies. This collaborative effort involves the identification and prioritization of community needs, the development of effective strategies and action plans, and the identification of available community resources.

Describe the jurisdiction's need for Public Services:

The City's 2022 Comprehensive Plan identified specific needs for persons experiencing homelessness. The plan includes the following recommendations that align with public services:

- Continue to develop, expand, and improve upon existing agencies and programs to further provide shelter, temporary housing, or transition housing for all segments of the homeless population
- Increase and coordinate outreach efforts to the City's homeless population. Consider the creation of a coordinator position to lead outreach efforts and serve as a liaison between City departments, nonprofit agencies, and the community at large.
- Provide legal assistance to families to prevent evictions. Also provide legal assistance to address immigrant issues.
- Continue to support enhancements to the Opportunity Center which provides lockers, laundry, showers, mailing addresses, and case management support to our homeless population.

To meet this need the City has added a goal in its Strategic Plan over the next five years of the Consolidated Plan:

3A. Supportive Services for LMI & Special Needs

The City also prioritizes the need for services that support LMI youth, elderly residents, and persons with a disability. While the City has a wide variety of supportive services for these populations, the availability of services does not meet the overwhelming need.

How were these needs determined?

The determination of priority needs in the City of Spartanburg was a result of a thorough and inclusive community engagement process, coupled with a comprehensive needs assessment conducted by the City. Through collaborative efforts, input was gathered from residents, housing service providers, and other local community development stakeholders. A key component of this process was a comprehensive community survey, which served as a platform for residents to voice their concerns and preferences regarding public services. The City's 2022 Comprehensive plan was also referenced.

Each year the City also holds community forums and public hearings in an effort to involve citizens and learn more about the needs for Public Services in the Communities. In addition, the City collaborates with a Citizens Advisory Committee, City and community leaders, and non-profit agencies to identify the City's priority needs for Public Service.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Market Analysis is made up of twelve subsections that cover a variety of topics that impact the supply of housing in the City.

- MA-10: The City has found that the most common form of housing type is single-family detached units. Large multifamily units are relatively uncommon, particularly as a home ownership opportunity. Rental units tend to be smaller than owner-occupied units, which means renters have fewer options if they have a larger family.
- MA-15: The cost of housing has increased substantially over the last 10 years, particularly for renters. This has led to an affordability problem where a growing segment of the population can't afford to live in the city without being cost burdened or living in substandard housing.
- MA-20: More than a quarter of homeowners and nearly a half of all renters in the city have at least one housing problem but very few have two housing problems. As was noted earlier, the most common housing problem by far is the cost burden.
- MA-25: The Spartanburg Housing Authority reports significant demand for both public housing and vouchers. There are currently over 1,800 households receiving vouchers and 1,100 in public housing units. The SHA reports long waitlists for both vouchers and public housing.
- MA-30: Persons experiencing homelessness are in need of more support than other residents.
 There is a high need for more beds in the City. There are currently only 158 year-round emergency shelter beds available for a continuously growing population.
- MA-35: The City has a large number of facilities available to help elderly residents, those with disabilities, persons with HIV/AIDS, and people struggling with addiction. There is still a large need, particularly for increased transportation and meal services that accommodate the needs of the elderly and persons with a disability.
- MA-40:Ssome public policies can have a negative effect on affordable housing and residential investment. Previously, the City identified several local regulations that could be adjusted to improve affordable housing production, including adjusting zoning, altering parking requirements, and additional support for local non-profits.
- MA-45: There are many factors that have an indirect impact on the housing market. In particular, economic opportunities have a large impact on the demand for housing. Education is also an important factor in determining income and other opportunities.
- MA-50: Within the City there are two census tracts that have substantially higher rates of cost burden. One of these areas is predominantly Black or African American. Additional support is needed to address this community's needs.
- MA-60: The City is in an urban area that has no significant gaps in broadband coverage. However, there is a need for additional providers because the average Spartanburg household has only two options for broadband providers.

• MA-65: Climate change has increased the need to address natural disasters in the community. The City is increasingly at risk of the impacts of climate change and LMI residents are particularly vulnerable due to limited resources to combat the impacts of climate-based natural hazards.

The Market Analysis provides insight into what types of housing is needed and who needs them. The information gathered and analyzed here helps set the priorities for both the Action Plan and Strategic Plan. It is necessary to understand how things have changed and how they stand now to make wise decisions about how to use resources in the future.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section examines the composition of the City's housing stock in terms of housing type and tenure. It presents a detailed breakdown of the number of units in the structure, multifamily housing distribution within the jurisdiction, unit size and tenure, as well as an analysis of owner-occupied and renter occupied housing.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	10,930	63.0%
1-unit, attached structure	649	3.7%
2-4 units	2,053	11.8%
5-19 units	2,368	13.6%
20 or more units	1,164	6.7%
Mobile Home, boat, RV, van, etc	188	1.1%
Total	17,352	100%

Table 27 – Residential Properties by Unit Number

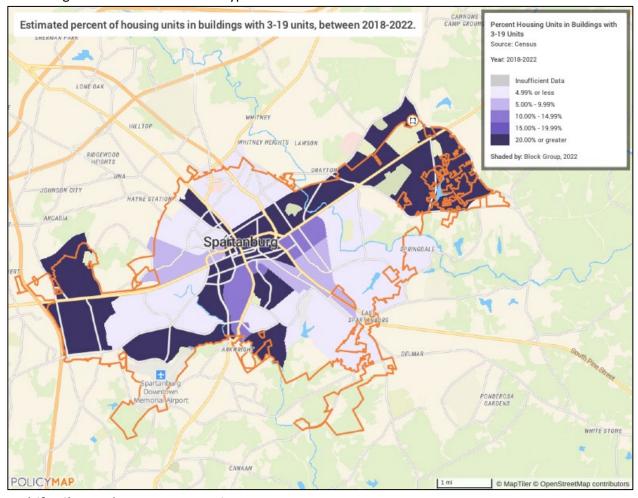
Data Source: 2018-2022 ACS

The table above breaks down the City's housing stock by the number of units in each structure and by structure type. Traditional single-family detached homes are most prominent accounting for 63% of all housing units. Medium to large multi-family developments (5 to 19 units) are the second most common housing type, accounting for 14% of all housing units in the City.

The maps below display the distribution of small, medium, and large multifamily developments in the City. Darker shaded block groups are those with a higher percentage of the highlighted development compared to all unit types in a given block group.

Small Multifamily Developments

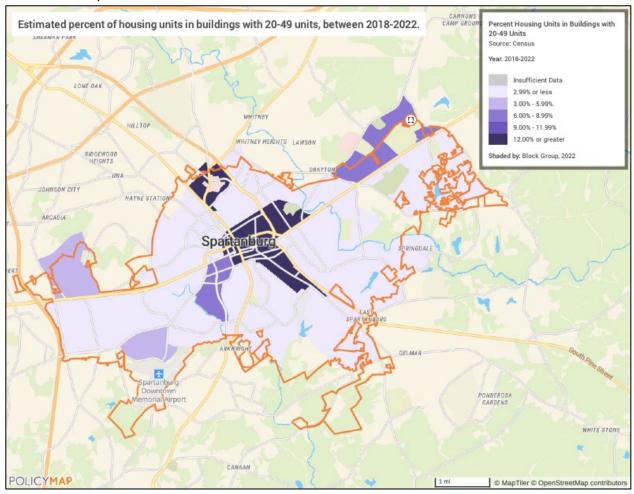
Small multifamily units have between 3 and 19 units in each development. These developments are scattered throughout the City. There are no areas that stand out with a disproportionately large number of housing units in structures of this type.



Multifamily Developments 3-19 Units

Medium Multifamily Developments

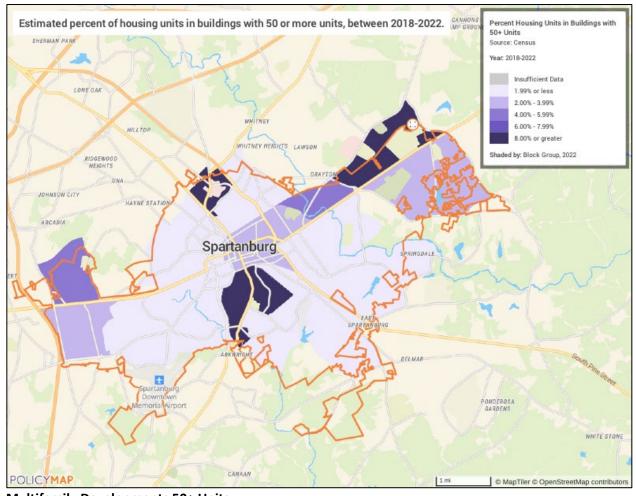
Medium multifamily developments have between 20 and 49 units per development. Like small multifamily developments, medium developments are found throughout the City, however the highest concentration of these developments is downtown.



Multifamily Developments 20-49 Units

Large Multifamily Developments

Large multifamily developments are buildings with 50 or more units. The highest concentration of large developments can be found in the south central, and northeastern tracts. These developments make up less than 5% of the available units in most tracts, however.



Multifamily Developments 50+ Units

Unit Size by Tenure

	Owne	ers	Ren	ters
	Number	%	Number	%
No bedroom	0	0%	460	6%
1 bedroom	25	0%	1541	21%
2 bedrooms	1418	17%	3080	42%
3 or more bedrooms	6811	83%	2252	31%
Total	8254	100%	7333	100%

Table 28 – Unit Size by Tenure

Data Source: 2018-2022 ACS

The size of housing units typically correlates with their occupancy status, distinguishing between owner-occupied and renter-occupied residences. Owner occupied units tend to be larger than rental units. Approximately 0% of owner-occupied units have one bedroom or less, while 27% of rental units have one bedroom or less. Conversely, about 83% of owner-occupied units have three or more bedrooms, but only about 31% of rental units are similarly large. This disparity raises two potential housing issues that may need to be analyzed.

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Spartanburg Housing primarily targets very low-income and extremely low-income households in the area. Spartanburg Housing has a portfolio of 416 public housing units, and 117 units for low- and moderate-income families and administers over 2,650 housing vouchers, including 1,700 Housing Choice Vouchers (HCV), 273 Project-based Vouchers, 28 Homeownership Vouchers, 495 Rental Assistance Demonstration (RAD), 150 Mainstream vouchers, and five Veterans Affairs Supportive Housing (VASH) vouchers.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the HUD Multifamily Assistance and Section 8 Database, there are 18 developments with contracts in the City. Of these developments, there are 10 that have expiring contracts in the next five years. It should be noted that many of these contracts are annual contracts that are expected to be renewed. However, if none of these contracts were renewed, the City could lose 168 units of affordable housing.

Does the availability of housing units meet the needs of the population?

No, the available housing units insufficiently meet the needs of the population. As mentioned in the Needs Assessment, there are a significant number of residents who are cost burdened. This means that they cannot find housing units for a price that meets their needs. Renters are particularly likely to be cost

burdened. The City has a clear shortage of affordable housing units that needs to be addressed. As of July 2023, there were over 5,000 people on waiting lists for Spartanburg Housing public housing units. When SH opened the HCV application in November 2022, over 6,000 households applied. On average, Spartanburg Housing can pull about 100 applications from the waiting list each month. At this rate, it would take the housing authority five years just to house the applicants that applied in November 2022.

Describe the need for specific types of housing:

The City has a very limited supply of owner-occupied units with fewer than two bedrooms. Smaller units tend to be more affordable and attractive to new homeowners or retired residents who are looking to downsize. If these units are not available, then residents will need to move outside the city or live in substandard housing.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Cost is a key factor affecting housing demand because the units in a city must be affordable in order to meet the community's needs. The following section examines the cost of housing for both homeowners and renters in the City of Spartanburg. A review is made of current home values and rents as well as the recent changes in home values and rents. Finally, a closer look is given to the affordability of the existing housing stock for the residents of the jurisdiction.

Cost of Housing

	Base Year: 2012	Most Recent Year: 2022	% Change
Median Home Value	117,500	165,000	40%
Median Contract Rent	513	774	51%

Table 29 - Cost of Housing

Data Source: 2008-2012 ACS, 2018-2022 ACS

Rent Paid	Number	%
Less than \$500	1,182	17%
\$500-999	2,490	35%
\$1,000-1,499	2,745	39%
\$1,500-1,999	450	6%
\$2,000 or more	159	2%
Total	7,026	100%

Table 30 - Rent Paid

Data Source: 2018-2022 ACS

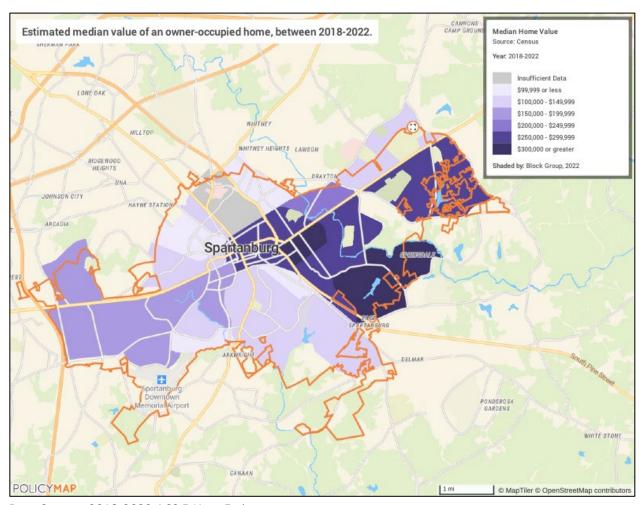
Housing Costs

Since 2012, the median home value in the City has increased by 40% and median rent has increased by 51% in nominal dollars. This significant growth exacerbates affordability issues within the city. With rents increasing more dramatically than home value, enters find themselves at a growing disadvantage in the pursuit of homeownership. The disproportionate increase in rental expenses reduces their ability to save for a down payment.

The second table above breaks down rent by the number of households in payment ranges. The largest price cohort is \$1,000 to \$1,499 with 39% of the renter population. Five years ago, 65% of renters were paying between \$500 and \$999 a month, however over the last five years this cohort has decreased to 35%. The smallest group is households that pay more than \$2,000 per month. Later in this section rental rates will be looked at more closely.

Home Values

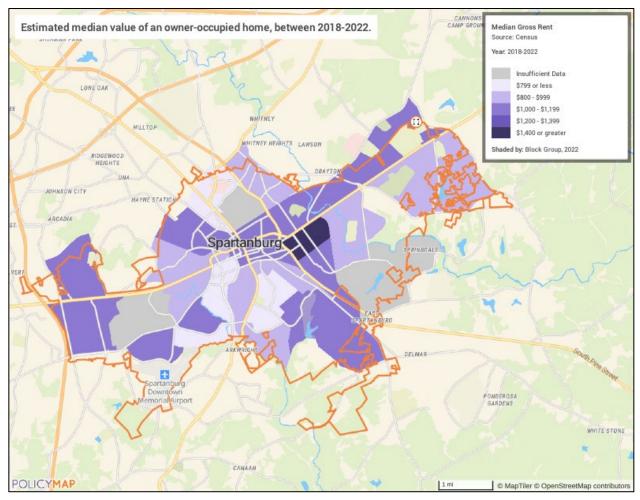
The following map provides a visual display of the median home values throughout the City. Median home values are highest in the east part and downtown and values are lower in the north and western central areas of Spartanburg.



Data Source: 2018-2022 ACS 5-Year Estimates

Median Rent

The following map looks at median rent in Spartanburg. The median rent is highest east of downtown and lowest in the south central portion of the City. Due to data limitations, there are multiple block groups where the median rent could not be accurately determined.



Data Source: 2018-2022 ACS 5-Year Estimates

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	985	No Data
50% HAMFI	2,190	800
80% HAMFI	5,395	2,275
100% HAMFI	No Data	2,940
Total	8,570	6,015

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

Housing Affordability

The table above represents the number of units that are affordable to Households earning 30%, 50%, 80%, and 100% of the HUD Area Median Family Income (HAMFI). Not surprisingly, there are less units affordable to households with lower HAMFI. No data is available for extremely low-income owner-occupied households or 100% HAMFI renter occupied households. However, there are less than 1,000 units affordable to 30% HAMFI households, but according to 2020 CHAS data, there are approximately 2,430 renter households in this income bracket.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	830	854	965	1,254	1,296
High HOME Rent	830	854	965	1254	1296
Low HOME Rent	692	741	890	1028	1147

Table 32 - Monthly Rent

Data Source: HUD FMR and HOME Rents

HOME Rents Limits and Fair Market Rents (FMR)

Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.

The table above compares the 2023 HOME program rent limits and the Fair Market Rents (FMR) in the City. The High HOME Rent is either the same or lower than the FMR. This means that HOME subsidized rental housing is more affordable than Fair Market rates.

Is there sufficient housing for households at all income levels?

The City does not currently have enough housing for residents at all income levels. Affordability continues to be a problem, particularly for low-income households. Increasing home values and rents result in much of the housing stock being out of the affordable range for large portions of the population, notably impacting low-income households that are likely to be cost-burdened.

According to the 2018-2022 American Community Survey 5-Year estimates, there are 1,765 vacant units in Spartanburg. The homeowner vacancy rate stands at 1.9%, while the rental vacancy rate is 4.2%. These rates are low, particularly the homeowner vacancy rate and points to insufficient housing for residents. Considering the rising median rent, limited housing type options, and high rate of cost-burdened renters, the housing market is continuing to not meet the demands of the residents.

How is affordability of housing likely to change considering changes to home values and/or rents?

It is difficult to project exactly how housing affordability will change, but it is unlikely that housing will become significantly more affordable in the future. Looking at the trends from the last 10 years, the City's Median Home Value increased 40%, and the Median Contract Rent increased by 51%. Although the Median Household Income also increased by 48% during the same time period, it was not a consistent increase among all households or income brackets. Many households, particularly low-income households, are struggling to keep up with the rising housing costs.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Median Contract Rent for 2022 was \$774 and approximately 52% of renters pay less than \$1,000. The Median Contract Rent falls below the efficiency Fair Market Rent, High HOME Rent, as well as Low HOME Rent. While the median rent remains relatively affordable, there remains a pressing need for more housing for those earning between 30% and 50% AMI. It is a priority for the City to produce and preserve affordable housing in order to help residents of all income brackets acquire and maintain safe, secure housing. The City's strategy will take into account the dynamics of the rental market and consider ways to increase housing stock for cost burdened renters. Additional information about the City's housing plans can be found in the Strategic Plan and Action Plan sections of this document.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The tables and maps in this section provide details on the condition of housing units throughout the City by looking at factors such as age, vacancy, and the prevalence of housing problems.

As defined by HUD, the four housing problems are:

- 1) a home which lacks complete or adequate kitchen facilities
- 2) a home which lacks complete or adequate plumbing facilities
- 3) a home which is overcrowded (having more than one person per room)
- 4) a household that is cost burdened (paying 30% or more of their income towards housing costs)

Definitions

For the purposes of this plan, units are in "standard condition" when the unit is in compliance with the local building code, which is based on the International Building Code.

The definition of substandard housing is a housing unit with one or more serious code violations. For the purposes of this analysis the lack of complete plumbing or complete kitchen will also serve as an indicator of substandard housing.

Units are in "substandard condition but suitable for rehabilitation" when the unit is out of compliance with one or more code violations, and it is both financially and structurally feasible to rehabilitate the unit.

Condition of Units

Condition of Units	Owner-	Occupied	Renter	-Occupied
	Number	%	Number	%
With one selected Condition	1,391	17%	3,261	44%
With two selected Conditions	44	1%	184	3%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	6,819	82%	3,888	53%
Total	8,254	100%	7,333	100%

Table 33 - Condition of Units

Data Source: 2018-2022 ACS

Condition of Units

The table above details the number of owner and renter units that have at least one housing condition. Approximately 17% of all owner-occupied housing units face at least one housing condition while 44% of all rental units have at least one housing condition. There are no units with more than two housing

conditions. When compared to the affordability statistics provided earlier in this section, it is clear that the overwhelming majority of housing problems are housing cost burden?

Year Unit Built

Year Unit Built	Owner-	Occupied	Renter	-Occupied
	Number	%	Number	%
2000 or later	1,151	14%	1,068	15%
1980-1999	890	11%	1,689	23%
1950-1979	4,233	51%	3,327	45%
Before 1950	1,980	24%	1,249	17%
Total	8,254	100%	7,333	100%

Table 34 - Year Unit Built

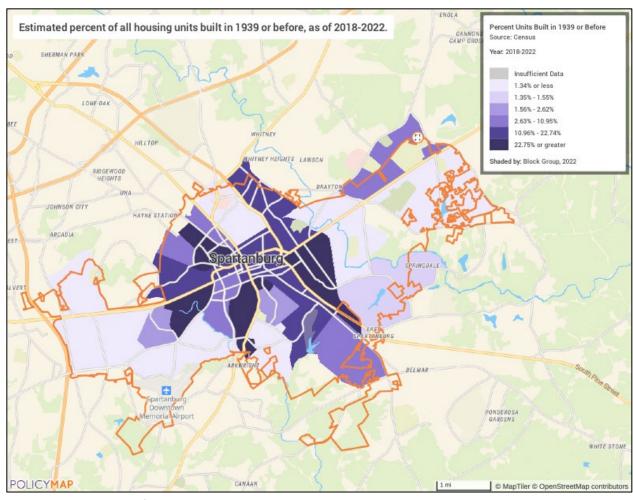
Data Source: 2016-2020 CHAS

Year Unit Built

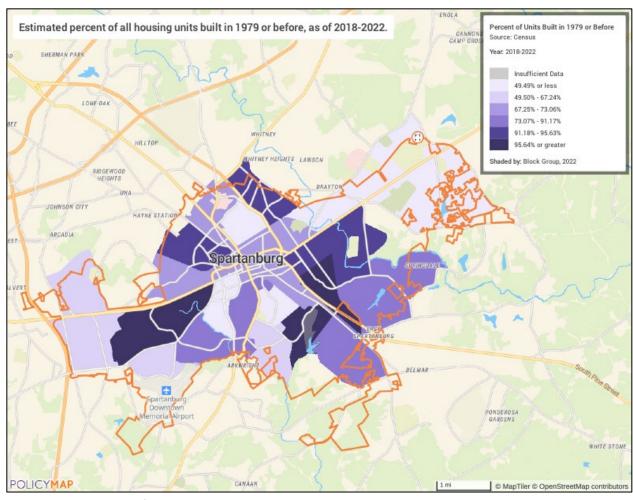
There is a large percentage of housing units built between 1950 and 1979. Roughly 75% of the owner-occupied housing stock and 62% of renter-occupied units were built prior to 1980, meaning they are at risk of having led-based paint. These units may require additional support to ensure a safe living environment, particularly for children. This amounts to nearly 11,000 units. Only a small percentage of the housing stock, 14% of owner-occupied and 15% of renter-occupied, was built after 2000. Renter-occupied housing tends to be newer than owner-occupied.

Age of Housing

The maps below depict the prevalence of older rental housing units in Spartanburg. The first map identifies the percentage of rental units built prior to 1940, while the second map depicts rental units built before 1980. The darker shaded areas have higher concentrations of older housing units, and the lighter shaded areas have a younger housing stock. As noted above, the housing stock is relatively old in the area. In two block groups on the western and southern sides of the City, 100% of the housing stock was built prior to 1980.



Housing Units Built Before 1940



Housing Units Built Before 1980

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	5,560	79%	5,610	68%
Housing Units build before 1980 with children present	722	10%	162	2%

Table 35 - Risk of Lead-Based Paint

Data Source: 2018-2022 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

As mentioned previously, any housing unit built prior to 1980 may contain lead-based paint in portions of the home. The most common locations are window and door frames, walls, and ceilings, and in some cases throughout the entire home. Thus, it is generally accepted that these homes at least have a risk of lead-based paint hazards and should be tested in accordance with HUD standards. The greatest potential for lead-based paint and other environmental and safety hazards is in homes built before 1980. Within the City there are approximately 11,000 housing units built before 1980.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	1,765	0	1,765
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Alternate Data Source Name: 2018-2022 ACS 5-Yr Estimates

Data Source Comments: The City does

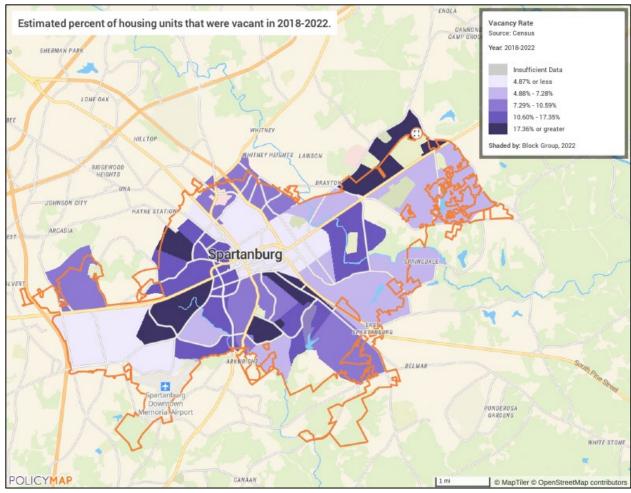
The City does not have data for vacant units in the City. The ACS data (B25004) reports on the total number of vacant units in Spartanburg. Data does not distinguish between suitable or nor suitable for rehab or if they were abandoned, REO properties or abandoned REO properties.

Vacancy Rate

There are currently 1,765 vacant units in the City. These units provide an opportunity to create affordable housing units for LMI households. The map below shows the average housing vacancy rates throughout the area. The darker shaded areas have higher vacancy rates, while the lighter shaded areas have lower vacancy rates.

Consolidated Plan SPARTANBURG 92

OMB Control No: 2506-0117 (exp. 09/30/2021)



Vacancy Rate

Need for Owner and Rental Rehabilitation

Generally, older units need rehabilitation as they age, and it becomes harder to meet the minimum property maintenance standards. According to ACS data, about 75% of the owner-occupied housing stock and 62% of renter-occupied units were built prior to 1980. These units are mostly over 45 years old. These units have a potential lead-based paint hazard, and this is a large concern for low-income households that may lack the resources to properly rehabilitate their homes to address the presence of lead-based paint.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

To estimate the number of housing units in the jurisdiction by low- or moderate-income families that may contain lead-based paint hazards, this report assumes that homes by year built are distributed evenly across income categories, as no local data exists to describe otherwise. It is estimated that there are approximately 11,000 units built prior to 1980 and approximately 51% or 5,500 have LMI households in them.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Publicly supported housing is available in the city in order to support low-income residents. The housing is overseen by Spartanburg Housing, which manages public housing and provides housing choice vouchers. Throughout the following section, a common theme is the need for more housing and additional resources to update the housing that is available. The City continues to have residents struggle with housing security and affordability, which places continuously increasing demand on an under supported system.

Totals Number of Units

				Program [*]	Гуре				
	Certificate	Mod-	Public		Vouchers				
		Rehab	Housing	Total	Project -	Tenant -	Specia	l Purpose Vouc	her
					based	based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers									
available	0	287	1,134	1,827	232	1,595	0	0	0
# of									
accessible									
units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

According to Spartanburg Housing (SHA), there are currently over 1,100 public housing units available in the City. SHA also manages more than 1,800 housing choice vouchers, 232 of which are project-based. Project-based vouchers are tied directly to specific units. Both public housing units and vouchers currently have a waitlist.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The City has seven public housing developments. HUD publishes regular inspection scores for each public housing development. Developments with a score of 90 or more are considered to be in excellent condition, while those with a score below 70 are considered to be in poor condition. A majority of the City's developments are in excellent condition. Archibald Rutledge received the lowest inspection score and the only poor rating in the City.

Public Housing Condition

Public Housing Development	Average Inspection Score
CAMP CROFT COURTS	90
CAMBRIDGE PLACE	94
GOOCH/ARCHIBALD VILLAGE	79
SPARTANBURG SOUTHSIDE PROJECTS	81
SINGLE FAMILY UNITS	91
ARCHIBALD RUTLEDGE	63
PRINCE HALL APTS	73

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

There is a significant need for rehabilitation and revitalization at Archibald Rutledge. The SHA's 5-Year PHA plan identifies plans for substantial rehabilitation to all 150 units at Archibald Rutledge and new construction to add additional units. These modifications and additional units are expected to be repositioned in 2024 and 2025.

Additional rehabilitation plans are imminent at scattered site single family units, Archibald Village, Cammie Clagett, and Cambridge Place in 2024.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

SHA's mission is to develop, manage, and provide diverse, quality housing and programs to promote self-sufficiency. In order to complete the SHA's mission, they are focusing on development with intention. Upcoming improvements include updates to appliances, HVAC systems, water heaters, roofs, landscaping, exterior lighting, and more. The first essential updates are underway at Archibald Rutledge, and SHA expects these to be completed in 2025.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

According to the 2023 Housing Inventory Chart (HIC) for the Upstate Continuum of Care, where the City of Spartanburg is located, there are 11 organizations administering 12 projects that provide Emergency Shelter, Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing assistance to persons experiencing homelessness in Spartanburg County. This includes 6 Emergency Shelters, 3 Transitional Housing programs, 1 Rapid Rehousing program and 2 Permanent Supportive Housing programs. The HIC reports the total number of beds available and being utilized on a single night in January for each type of homeless assistance project. The table below details the number of year-round beds available for each household type and target population in Spartanburg County. Please note that the table below does not include the number of year-round beds available for Rapid Rehousing programs. On a single night in January there were 4 beds available for households with adult(s) and Child(ren) and 4 beds available for households with only adults in Rapid Rehousing programs in Spartanburg County.

Facilities and Housing Targeted to Homeless Households

	Emergency S	helter Beds	Transitional Housing Beds	Permanent Supportive Housing Beds		
	Year Round Beds Voucher / (Current & New) Seasonal / Overflow Beds		Current & New	Current & New	Under Development	
Households with Adult(s) and						
Child(ren)	54	16	6	12	0	
Households with Only Adults	92	0	32	26	0	
Chronically Homeless Households	0	0	0	38	0	
Veterans	12	0	13	0	0	
Unaccompanied Youth	0	0	9	0	0	

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: 2023 Housing Inventory Chart (Spartanburg County)

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

Within the Spartanburg area there are several agencies that complement services targeted to persons experiencing homelessness:

- South Carolina Department of Social Services Assists with enrolling individuals in services to prevent or address homelessness.
- Butterfly Foundation Operates a housing program for chronically homeless and/or persons with disabilities. The organization also runs a culinary job training program that is targeted to the unemployed, underemployed, previously incarcerated, and homeless adults.
- Access Health Provides case management and care coordination to help persons apply for food stamps, Medicaid, or financial assistance for continuing their education.
- Spartanburg Mental Health Center SOAR Program Helps increase access to SSI/SSDI for adults experiencing or at risk of experiencing homelessness and have a mental illness, medical impairment, and/or substance use disorder.
- New Horizon Family Health Services Mobile Unit Runs a Health Care for the Homeless (HCH) program which conducts outreach and provides medical, dental, behavioral health, and other services to residents where they are, using a 35-foot mobile medical unit.
- ReGenesis Health Care Develops and implements programs focused on improving quality of life and creating economic opportunity in low-income communities.
- St. Luke's Free Clinic Provides health care to uninsured residents in Spartanburg County to meet their need for primary medical care, medications, and patient education.
- South Carolina Works Provides employment assistance through work search and training programs.
- South Carolina Legal Services Helps with the prevention of homelessness through legal assistance in the case of evictions or foreclosures.
- Piedmont Care Provides care, prevention, and advocacy for persons with HIV/AIDS and their families.
- Upstate Warrior Solution Provides supportive services, outreach, and case coordination for veterans in the Spartanburg area.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

• Butterfly Foundation – Has five beds designated for people experiencing chronic homelessness. Supportive services and case management are also available.

- Battle Betty Foundation Provides emergency shelter, emergency food, gas/ transportation, and limited utility assistance to low-income Female Veterans, including those experiencing homelessness.
- United Housing Connections Provides emergency shelter, rapid re-housing, and permanent supportive housing units for individuals experiencing chronic homelessness.
- Project R.E.S.T (Formerly Safe Homes) Provides emergency shelter, housing, and counseling to victims of domestic violence.
- Spartanburg Interfaith Hospitality Network Has an emergency shelter for families experiencing homelessness. While residents are staying at the shelter, they are taught life skills and case management is provided.
- Miracle Hill Operates an emergency shelter for adults that is regularly at 95% capacity. An additional 80 beds are available during freezing weather conditions.
- The Haven Community Solutions Is an emergency shelter for homeless families. They provide shelter, food, clothing, case management, crisis intervention, street outreach, advocacy and more.
- GoForth Recovery Operates a men's substance use disorder recovery program and residential
 transitional living home with both emergency shelter beds and transitional beds for individuals
 with substance use disorder.
- Operation Rehabilitation Provides transitional housing beds to Veterans while also providing case management services.
- HOPE Center for Children Operates a transitional program serving older youth (ages 16 22) who are homeless or are nearly homeless, many of whom have recently aged out of the foster care system, a residential group home for teen girls in foster care serving girls ages 11-18, and Faucette House, an emergency shelter that serves youth in foster care ages birth to 19. It is the only emergency shelter in Spartanburg County for children who have been removed from their home due to allegations of abuse or neglect.
- Warriors Once Again Operates a 5-bed transitional housing program for Veterans experiencing homelessness.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Within the City of Spartanburg, there are four principal groups with non-homeless special needs: the elderly and frail elderly, those affected by HIV/AIDS and their families, those grappling with alcohol and/or drug addiction, and those with mental and physical disabilities. This section aims to define these groups, outline their supportive housing needs, and expound on how the City is currently or should be addressing those needs.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly: The supportive housing needs for this population can vary widely depending on the health and fitness of the individuals. In general, elderly residents need a living environment that provides them with several areas of assistance or convenience. First, the availability of healthcare is important because health problems generally become more prevalent with aging. Second, the availability of assistance with daily activities (i.e., shopping, cooking, and housekeeping) becomes more important as people grow older. Third, the availability of transportation, particularly public transportation that is accessible to them, is necessary to allow elderly persons to live as independently as possible for as long as possible. Fourth, safety is a primary concern since older residents are particularly vulnerable to crime or exploitation. Fifth, the weather and climate are considerations for elderly people because these factor into transit as well as health. Supportive housing must include access to health professionals and allow for housing modifications to assist the residents with their independence.

HIV/AIDS: Medical and social support is important for residents living with HIV/AIDS. While there have been great advances in the medical treatment of HIV/AIDS, it is important to provide specialized support. Family and friends must have access to information and be accessible to the individual. Medical facilities also must be nearby.

Alcohol and/or Drug Addiction: Individuals dealing with addiction often require housing options that will provide a safe, sober place for recovery. A strong network is necessary to maximize the chance they will stay healthy and sober. It is important that these people have access to health services, support groups, employment assistance, and access to family and friends. Additionally, detoxification facilities are necessary when addiction is first recognized. By taking a harm reduction approach to addiction, the City can work to reduce the harms of addiction and provide support during recovery, particularly for those dealing with opioid addiction.

Mental and Physical Disabilities: Individuals with disabilities encompass a wide range of skill levels and abilities. Therefore, they have many of the same issues as the general population with the added needs that are unique to their situation. Often, individuals with disabilities have a fixed income and limited

housing options. Individuals with more independent skills can utilize subsidized housing but individuals that need more support or specialized housing have fewer options. Many individuals continue to reside with parents and families throughout adulthood, which can put an additional financial burden on the family. Regardless of the housing situation, a common thread is the need for continuous supportive services that are dependent on the individual's level of capabilities.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

There are several supportive housing and services programs in the community that address the supportive housing needs of persons returning from mental and physical health institutions. The Spartanburg Mental Health Center in partnership with United Housing Connections administers a Shelter + Care program that has 20 beds dedicated to those experiencing homelessness with a disability.

United Housing Connections operates multiple affordable housing complexes that people exiting an institution have access to. Draymont Ridge is a 40-bed complex for low-income families, including those experiencing homelessness, Capps Villa is a 14-bed complex for people with disabilities, Liberty Square is a 43-bed complex for low-income seniors, and Draymont Crossing is a 12-bed facility also for low-income seniors. In addition to these affordable housing projects, United Housing Connections administers a Permanent Supportive Housing program for chronically homeless individuals that can serve up to 18 households.

The Charles Lea Center provides support for residents who face physical and mental challenges. These services include residential services, day services employment services, service coordination, early intervention, clinical services, and health services.

Spartanburg Mental Health Center is a provider for the Substance Abuse and Mental Health Services Administration (SAMHSA) funded program called Project for Assistance in Transition from Homelessness (PATH). The PATH program offers specialized outreach services, community mental health, substance abuse treatment, case management and referrals for individuals and families experiencing homelessness or at-risk of homelessness, including exiting an institution, with a serious mental illness (SMI) or co-occurring diagnosis of SMI and substance use disorder.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City will fund a variety of nonprofit organizations that provide vital services to the special need's population. Services will include transportation for the elderly and services that help to accommodate people who have a disability, development of transitional housing units for women coming out of

incarceration, transitional housing and supportive services to single veteran, and others that incorporate 5-year goals into the 2024 Annual Action Plan. Goals include:

2A Provide for Owner Occupied Housing Rehab

2B Increase Homeowner Housing Opportunities

2C Increase Renter Housing Opportunities

2D Reduce Slum & Blight in Residential Areas

3A Provide Services for LMI & Special Needs

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Although public policies are made with the intention to positively address the needs of citizens in a jurisdiction, there are times where they may have an unforeseen negative effect on certain aspects of the community, which in this case is affordable housing and residential investment. Public policies that affect affordable housing and residential investment negatively, in turn becomes a barrier to creating affordable housing in the area. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

To identify these negative effects and further the purposes of the Fair Housing Act, the U.S. Department of Housing and Urban Development (HUD) made it a legal requirement that entitlement grantees affirmatively further fair housing. The primary tool communities have for identifying contributing factors that lead to negative effects on the community is the Analysis of Impediments of Fair Housing Choice (AI).

The AI reviews the community demographics, market availability, public and private policies, practices, and procedures affecting fair housing choice and affordable housing. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin. The AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

To ensure that all residents in the City of Spartanburg are protected under state and local law, and to adhere with HUD regulations on fair housing as required by CPD entitlement grants, the City has taken steps to promote fair housing and to educate its leadership, staff, and residents on what HUD defines as fair housing and discrimination in housing.

In 2019, the City of Spartanburg, in partnership with the County and the Spartanburg Housing Authority came together to carry out the Joint Analysis of Impediments of Fair Housing Choice, which identified six impediments to fair housing in the region along with a table listing their associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors were also provided, along with goals, timelines, and responsible parties.

Full details of the fair housing impediments can be viewed in the 2019 Joint AI. A list of the identified impediments is shown below:

Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices

Impediment #2: Neighborhoods Need Place-Based Community Investments

Impediment #3: Need for Continued and Expanded Fair Housing Activities

Impediment #4: Affordable Housing Planning Lacks Equity Focus

Impediment #5: Limited Housing Options for People with Disabilities

Impediment #6: Weak Job-Transit Connections

Actions Taken to Address Impediments

The following actions have been made to address affordable housing barriers and form partnerships with other local government, private, and non-profit organizations to implement these plans.

- Collaborate with Spartanburg Housing and the County to implement ongoing landlord recruitment campaign for the Housing Choice Voucher program.
- Develop opportunities for property owner and tenant education through events, seminars, and the Fair Housing Hotline managed by Neighborhood Services Staff.
- Support and accommodate proposed LIHTC developments in jurisdiction, providing letters of support and gap financing where possible and appropriate.
- Give new affordable housing development priority consideration when it will be located in an area that increases access to new types of opportunities.
- Fund agencies that provide homeownership preparation and financial counseling for first time homebuyers.
- Develop partnerships with credit counseling agencies to reach minority communities and build a pipeline of potential homebuyers.
- Meet with lenders and/or appraisers to inform them of goals for furthering fair housing and discuss lending barriers related to homeownership and community reinvestment in low-income neighborhoods.
- Monitor and provide financial support for the efforts of existing community-based organizations in offering fair housing enforcement and education related to the rights of people with disabilities.
- Review and comment on the annual PHA plan to ensure it is furthering affordable housing opportunities in high-opportunity areas.
- Develop alternate programs that may provide direct transportation linkages between housing and employment centers and potential funding sources.
- Coordinate with Target Areas to develop and support place-based community improvements.
- The City is currently going under its Comprehensive Planning process and has committed to an equity-focused plan that addresses current barriers.
- The City working with a consultant AECOM developed a transportation study that identified strategies for addressing transportation needs in the City. https://www.wyff4.com/article/need-to-expand-spartanburg-public-transit-intersects-with-limited-funding/30693500
- The City is developing a micromobility strategy to address transportation needs identified in the previous AI and in the AECOM study.

Equity Plan

Noticed by HUD on February 9, 2023, entitlement communities will begin to develop Equity Plans which will provide a fair housing analysis, goals and strategy, and community engagement. The Equity Plan will answer questions on demographics, segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAP), access to community assets, access to affordable housing opportunities, access to homeownership and economic opportunity, any discrimination or violations of civil rights, and local/state policies and practices that impact fair housing in the City of Spartanburg. The Equity Plan will help guide the goals of the five-year plan and provide strategies that the City will utilize to affirmatively further fair housing in Spartanburg. Refer to Equity parameters and strategy from the City's adopted Comprehensive Plan: https://www.cityofspartanburg.org/DocumentCenter/View/1019/DRAFT-City-of-Spartanburg---Comprehensive-Plan-PDF

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section provides insight into the non-housing assets within the City of Spartanburg community. In particular, this section addresses economic activity and education levels. This data is used to identify any areas of economic concern or sectors where reinforced support might have an impact.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	89	7	1%	0%	-1%
Arts, Entertainment, Accommodations	1,531	4,985	9%	13%	3%
Construction	779	1,162	5%	3%	-2%
Education and Health Care Services	4,294	17,770	26%	45%	19%
Finance, Insurance, and Real Estate	823	2,489	5%	6%	1%
Information	261	353	2%	1%	-1%
Manufacturing	2,937	587	18%	1%	-16%
Other Services	677	1,060	4%	3%	-1%
Professional, Scientific, Management Services	1,438	3,904	9%	10%	1%
Public Administration	331	672	2%	2%	0%
Retail Trade	1,794	5,126	11%	13%	2%
Transportation and Warehousing	1,203	882	7%	2%	-5%
Wholesale Trade	338	567	2%	1%	-1%
Total	16,495	39,564			

Table 40 - Business Activity

Data Source: 2018-2022 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

In the above table, the prevalence of both workers and jobs by sector is presented. There are more than twice as many jobs as there are workers. Overall, there is a discrepancy of more than 23,000 jobs. The largest gap is in the Education and Health Care Services sector. There are nearly 18,000 jobs in this sector, making up 45% of all jobs. However, there are currently only about 4,200 workers in this sector. This is a significant gap.

Labor Force

Total Population in the Civilian Labor Force	17,840
Civilian Employed Population 16 years and over	16,498
Unemployment Rate	5.1
Unemployment Rate for Ages 16-24	15.3%
Unemployment Rate for Ages 25-65	6.0%

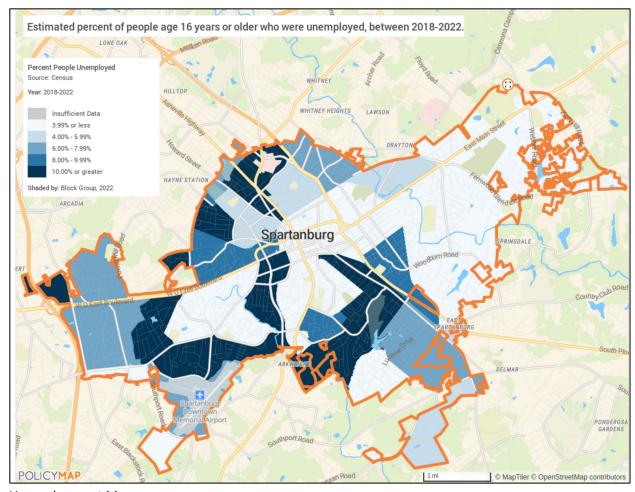
Table 41 - Labor Force

Data Source: 2018-2022 ACS

There are two primary sources used to analyze the unemployment rate in the city for this report. They each have pros and cons, but when taken together, they can provide a clearer view of unemployment in the city. The first source is the US Census Bureau's American Community Survey 5-Year Estimates. The ACS unemployment data is only taken annually, and the most recent data is from 2022. It is also an average of. The five years included, in this case 2018 – 2022, does not necessarily provide an accurate view of recent employment trends. However, the ACS data is available at a census tract level and can help identify any areas that may have disproportionately high unemployment rates.

The second source for unemployment data is the Bureau of Labor and Statistics. This measurement of unemployment is updated monthly and provides insight into any trends at the city level. It is not available at census tract level and therefore provides a look at employment as it relates to time, which the ACS looks at employment as it relates to space.

In the City, there is a wide variance in employment rates across different block groups. Several block groups with unemployment rates above 10% are to the northwest, west, and southeastern parts of the City.



Unemployment Map

Using data for the last 10 years from the Bureau of Labor Statistics it is clear that unemployment fell substantially from 2012 until 2020, when it made a sharp increase to surpass 2012 rates. This is due in large part to the global pandemic.

2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
10.3	8.7	7.0	6.5	5.4	4.8	3.6	2.9	8.8	5.6	3.8

In 2023, the unemployment rate stayed relatively static, with minor dips in May and August. It ended the year 0.5% lower than in January.

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
4.2	4.3	4.2	3.4	3.6	4.3	4.3	3.1	3.1	3.8	3.7	3.7

Occupations by Sector	Number of People
Management, business and financial	5,528
Farming, fisheries and forestry occupations	108
Service	3,095
Sales and office	3,447
Construction, extraction, maintenance and repair	1,120
Production, transportation and material moving	3,200

Table 42 – Occupations by Sector

Data Source: 2018-2022 ACS

The table above analyzes occupations by sector. Instead of showing which sectors are most common, as the table at the beginning of this section did, this shows what type of jobs are available in each sector. For example, this table would include a manager of a restaurant at the manager of a logging company in the same category (Management, Business, and Financial), while in the earlier table they would be in separate categories.

Within the City, the most prominent occupation sector is the Management, Business, and Financial sector. Over 5,500 people are employed in that sector. The second largest sector is Sales and Office, with 3,447 people, and the third largest is Production, Transportation, and Material Moving with 3,200 people.

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	11613	77%
30-59 Minutes	2745	18%
60 or More Minutes	739	5%
Total	15097	100%

Table 43 - Travel Time

Data Source: 2018-2022 ACS

All other factors being equal, residents would rather live in the same city as their job. Relative to short commutes, long commute times are associated with lower life satisfaction, increased stress, obesity, anxiety, depression, and increased exposure to pollutants. This is particularly true when compared to commuters who use bicycles or walk to work. In the City of Spartanburg, less than a quarter of residents commute more than 30 minutes to work each day.

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	1,024	246	1107
High school graduate (includes equivalency)	3,315	410	1663
Some college or Associate's degree	3,263	253	1238
Bachelor's degree or higher	4,936	287	789

Table 44 - Educational Attainment by Employment Status

Data Source: 2018-2022 ACS

Educational attainment is one of the best indicators of economic success, both in attaining a job and receiving a higher wage. In the City of Spartanburg, the unemployment rate for a person without a high school diploma is 24% while the rate for a resident with a bachelor's degree or higher is only 6%. The labor participation rate is also higher for those with higher educational attainment. Approximately 47% of residents without a high school diploma are not in the workforce, as compared to just 13% for those with a bachelor's degree or higher.

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	30	104	68	243	374
9th to 12th grade, no diploma	430	347	425	1068	718
High school graduate, GED, or alternative	1634	1808	922	2532	2038
Some college, no degree	1982	884	839	1493	862
Associate's degree	194	414	481	577	480
Bachelor's degree	243	1410	1024	1362	1264
Graduate or professional degree	15	435	966	779	965

Table 45 - Educational Attainment by Age

Data Source: 2018-2022 ACS

Educational attainment is one of the best indicators of economic success, both in attaining a job and receiving a higher wage. In the City of Spartanburg, the unemployment rate for a person without a high school diploma is 24% while the rate for a resident with a bachelor's degree or higher is only 6%. The labor participation rate is also higher for those with higher educational attainment. Approximately 47% of residents without a high school diploma are not in the workforce, as compared to just 13% for those with a bachelor's degree or higher.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,784
High school graduate (includes equivalency)	30,097
Some college or Associate's degree	34,436
Bachelor's degree	49,349
Graduate or professional degree	59,113

Table 46 - Median Earnings in the Past 12 Months

Data Source: 2018-2022 ACS

As mentioned previously, educational attainment and earnings are closely linked. The annual wage difference based on education can lead to substantial wealth differences over time. A person who graduates high school and works from the age of 18 to 65 will earn approximately \$1,414,559 during their working life. A person with a bachelor's degree who works from age 23 to 65 will earn about \$2,072,658 during their working life. That added financial benefit does not take into account the fact that employment compensation tends to include benefits like health insurance and retirement savings. Additionally, higher income can lead to investments, home purchases instead of renting, and other activities that can increase wealth substantially.

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

According to the Business Activity table above, the Education and Health Care Services sector provides the highest percentage of all jobs in the City, with 45% of all jobs coming from this sector. Education and Health Care Services also is the largest employer, which makes up 26% of all employees in the City.

Describe the workforce and infrastructure needs of the business community:

Consultation with local businesses led to the realization that the downtown area is perceived as outdated and in need of improvements. In order to address this, grant funds will be used on a downtown revitalization project. Additional information is available in the Strategic Plan.

There is also a need for a workforce that matches the jobs available in the city. Specifically, there is high demand for education and healthcare professionals to meet the needs of employers. Additionally, in the manufacturing sector there are far more workers available than there are jobs. This points to an opportunity to create jobs in the manufacturing sector within the city. The City should partner with educational, healthcare, and manufacturing stakeholders to meet the community's employment needs.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The city is not currently expecting any major changes that would have a significant economic impact.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

As discussed earlier in this section, there are approximately 39,000 jobs but only 16,000 workers. The largest disconnect is in the Education and Health Care Services sector, with a need for more than 13,000 workers. This is an opportunity for the City to work with local educators, school systems, hospitals, and healthcare systems to help match the workforce with employers' needs.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The City works closely with One Spartanburg, Inc. to attract companies that support high-paying jobs, to expand downtown restaurant and retail options, and to get a data-driven picture of the state of downtown to support its future development. They work with organizations such as Spartanburg Community College, Spark Center SC, Ready SC, SC Works, Apprenticeship Carolina, and three local career centers to provide training and employment opportunities. These efforts will support the City's economic development goals, which are described in more detail in the Strategic Plan.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Not applicable.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

HUD identifies four specific data points that constitute "housing problems": cost burden, overcrowding, lack of complete plumbing facilities, and lack of complete kitchen facilities. Areas of concentration are census tracts that have two or more housing problems that are substantially higher than the city's average. For this analysis, "substantially higher" is based on the HUD-provided standards set in the Needs Assessment. A tract with a housing problem rate of 10% or higher than the city average is considered substantially higher. To provide a more nuanced analysis, "cost burden" has been split into renter cost burden and homeowner cost burden.

Citywide rate

• Overcrowding: 1.6%

Lack of Complete Plumbing Facilities: 0.2%
Lack of Complete Kitchen Facilities: 0.8%

• Renter Cost Burden: 51.6%

Homeowner Cost Burden: 17.7%

Substantial Rate:

• Overcrowding: 11.6%

No areas of concentration

Lack of Complete Plumbing Facilities: 10.2%

No areas of concentration

• Lack of Complete Kitchen Facilities: 10.8%

Tract 45083021301 – 14.41%

Renter Cost Burden: 61.6%

o Tract 45083020500 - 64.45%

o Tract 45083020603 - 73.4%

• Homeowner Cost Burden: 24.8%

o Tract 45083020301 - 38.25%

o Tract 45083020500 - 38.31%

o Tract 45083020800 – 47.06%

o Tract 45083021001 – 44.65%

There are two tracts with a concentration of multiple housing problems. In tract 45083021301 there is a substantially higher lack of kitchen facilities and renter cost burden. In tract 45083020500 there is a substantially higher rate of both homeowner and renter cost burden.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Race/Ethnicity

For the purposes of this analysis, a concentration is any census tract where the racial or ethnic minority group makes up 10% or more of the city's average.

Citywide Rate:

• Asian: 2.1%

Black or African American: 44.7%
Multiracial, non-Hispanic: 2.1%
Hispanic, all races: 5.1%

Concentration Rate:

• Asian: 12.1%

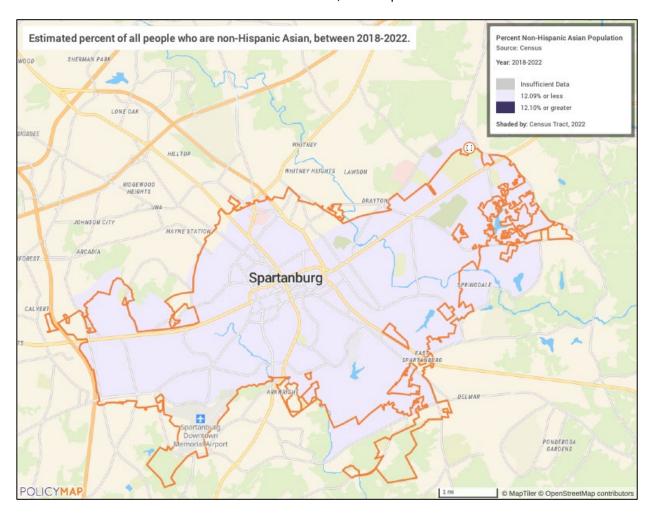
Black or African American: 54.7%Multiracial, non-Hispanic: 12.1%

• Hispanic, all races: 15.1%

Due to the small size of racial groups other than White, a comparison could not be conducted. Each group had a total population of less than 1%.

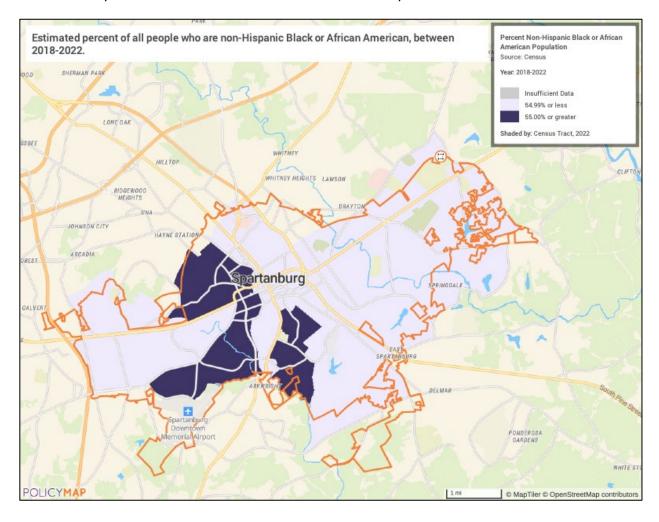
Asian:

There are no tracts that have a concentration of Asian, non-Hispanic residents.



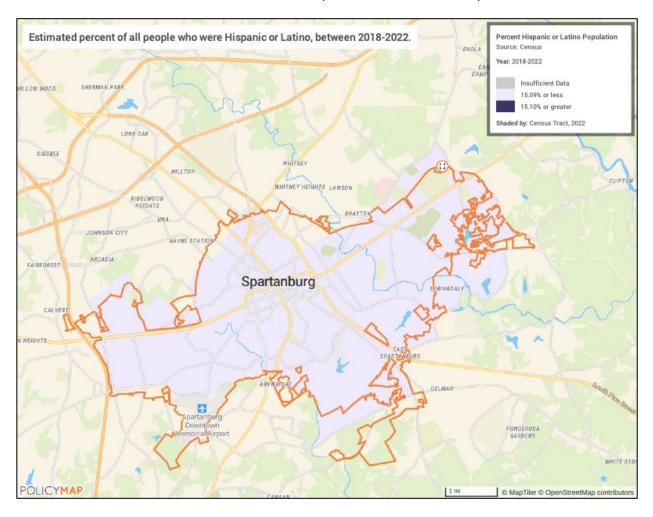
Black or African American:

The City of Spartanburg has multiple census tracts that have a concentration of Black, non-Hispanic residents. They are located in the southwestern areas of the City.



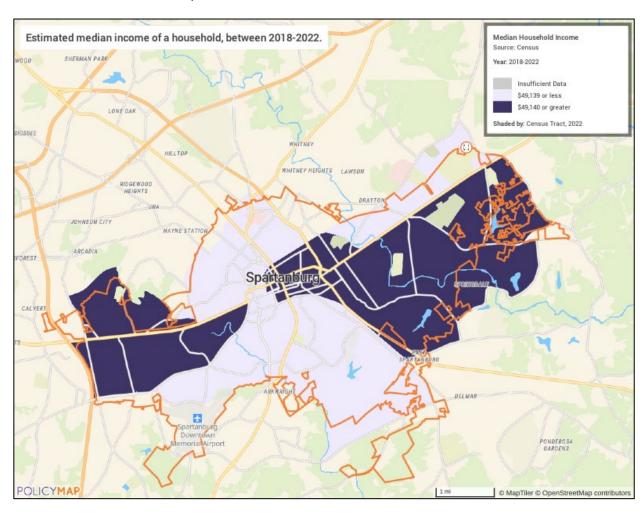
Hispanic, all Races:

There are no areas that have a concentration of Hispanic residents, as the map below shows.



Low-income Families

A family is considered low-income if it earns less than 80% of the area's median income. A tract has a concentration of low-income families if the tract's median household income is less than 80% of the City's median household income. The city's median household income is \$49,140, and 80% of that is \$39,312. Using this definition, the tracts on the east and west side of the city have a concentration of low-income families. These tracts match up with the areas of concentration of Black or African American households.



What are the characteristics of the market in these areas/neighborhoods?

In the area with a disproportionately large number of low-income households, the housing market shows some unique characteristics. The units in that area tend to be older than elsewhere in the city and have an increased risk of lead-based paint hazard. These areas also tend to have a higher number of larger multi-family developments and have an increased rate of housing problems, which is common with older housing stock. Due to the lower housing prices in this area, it is possible that these areas provide an important opportunity for reinvestment and revitalization.

Are there any community assets in these areas/neighborhoods?

The aforementioned area is one that has important community assets. There is a farmer's market, multiple parks, and several museums. These resources are valuable and could warrant additional support.

Are there other strategic opportunities in any of these areas?

Many of the census tracts that have a concentration of Black also overlap with qualified opportunity zones, including Highland. The following list includes strategic opportunities for these areas:

- The Consolidated Plan identified these areas as opportunities for redevelopment and infill. There
 are several substandard commercial properties in the corridors in the City. Several redevelopment
 projects have been planned and are underway. Long-term projects include Johnson Property
 development, infill housing on Beacon Street, redevelopment of the Bethlehem Center, infill
 housing on Westover Drive, redevelopment of Prince Hall, and others.
- The City and non-profit partners own several vacant lots can be used to provide affordable and market rate rental and homeownership opportunities. The lots are mostly designed for singlefamily use. There may be some opportunities for duplexes and townhomes with the support of the neighborhoods.
- 3. The City received America Rescue Plan Act (ARPA) funding that can be used as an opportunity to provide additional funding these areas.
- 4. The City recently approved a Comprehensive Plan which identified the potential of rezoning corridors to create greater in-fill. The City will be exploring the opportunity over the next two years.
- 5. Movement 2030 is a \$100 million investment in improving education in Spartanburg County, funded by the Blue Meridian Foundation. The Spartanburg Academic Movement (SAM) and One Spartanburg (local Chamber) will be assisting residents with education opportunities such as completion of post-secondary bachelor's and associate degrees for individuals that need counseling and assistance to finish degrees that were started but never completed. This is an opportunity to increase workforce opportunities for residents of low- and moderate-income areas.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

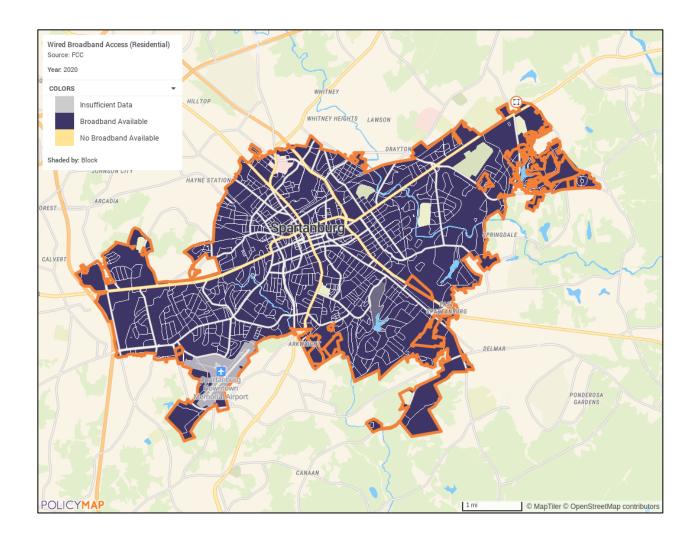
Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The Internet is an essential communication and information platform that allows users to take advantage of the increased interconnectedness of business, education, commerce, and day to day utility. Reliable access to the internet is becoming a necessity to thrive in the modern economic environment. Communities that lack broadband access struggle to keep pace with the country. Locations without broadband access impedes its population's ability to take advantage of the educational and entrepreneurial opportunities available online. This is particularly problematic for LMI areas where economic opportunities are already often lacking. The Internet for All initiative suggests a strong correlation between availability to high-speed internet and increased education, community services, and employment opportunities, especially in small cities and rural areas.

Spartanburg does not have significant gaps in broadband coverage. However, the vast majority of the city does not have multiple options of internet providers, to include LMI areas. The average Spartanburg household has only two (2) options for broadband-quality Internet service.

The following map shows broadband access throughout the City. Broadband access is defined as advertised internet speeds of 768 kilobits per second or higher. FCC data shows two major infrastructure options within Spartanburg: cable, fiber, fixed, 5G home internet and satellite.

See map: Broadband Access



Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Once broadband access has been obtained, it is important to ensure there is competition among service providers. Any resource that has a de facto monopoly on an area may not be incentivized to provide standard and consistent services. According to BroadbandNow.com, Spartanburg has a total of eight (8) Internet providers offering residential service. Spectrum and AT&T (Fiber) are the strongest providers in Spartanburg so far as coverage. The average Spartanburg household has two (2) options for broadband-quality Internet service. These providers do not frequently overlap around the city:

Spectrum (Cable)

AT&T Internet (Fiber)

Always ON (Fixed)

Verizon (5G Internet)

Starlink (Satellite)

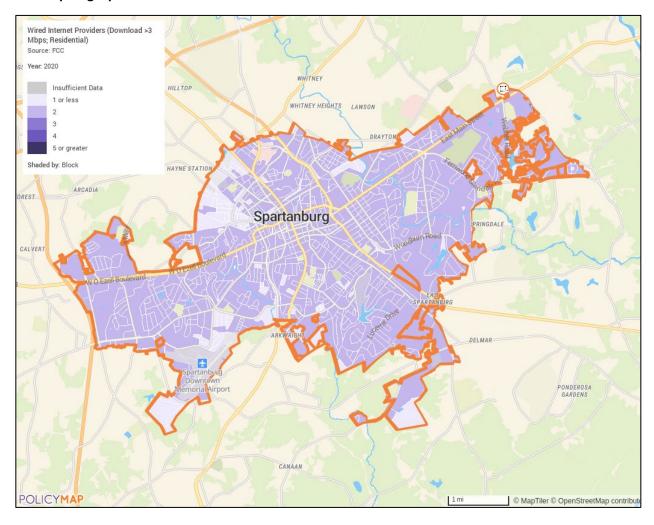
T-Mobile 5G Home Internet (5G Internet)

Viasat Internet (formerly Exede)(Satellite)

HughesNet (Satellite)

The following map shows the number of broadband service providers by census tract. Most of the city has at least two (2) options of high-speed internet with competitive providers, though there are some tracts with lower populations that only have access to one provider.

See map: Highspeed Internet Providers



MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Spartanburg has historically been prone to various natural hazard events including flooding, hail, thunderstorm winds, tornados, and others. The potential impacts of climate change—including an increase in prolonged periods of excessively high temperatures, more heavy precipitation, more severe storms, or droughts—are often most significant for vulnerable communities. According to the FEMA National Risk Index, the City of Spartanburg is particularly vulnerable to ice storms, lightning, and strong wind hazard types. The City is not located on the coast and is not likely to experience direct coastal effects. However, any increase in the ocean levels or increased storm activity may lead to people moving away from the coast. An increase in people could come into the City which may drive up housing costs, reduce the availability of jobs, and stretch resources. According to the Intergovernmental Panel on Climate Change (IPCC), by the middle of the century the average summer temperature is expected to rise four degrees. This rise in temperature could lead to altered weather and precipitation patterns, a rise in severe storms, an increased risk of catastrophic floods, increased electricity costs, and ruined crops.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Low- and moderate-income residents of owner-occupied and renter households are at particular risk due to having less available resources to combat the impacts of natural disasters. A dramatic rise in electricity or housing costs could put them at imminent risk of homelessness or living in substandard conditions. The 2024 America's Rental Housing Study issued by the Joint Center of Housing Studies of Harvard University found a particularly growing threat to property owners and renters to obtain and afford insurance required to cover potential weather- and climate-related hazards losses due to rising cost of insurance premiums as well as providers declining coverage in high-risk markets. This study also noted the potential increased difficulty for property owners to invest in climate change hardening mitigants due to the slowing growth in operating incomes. According to the 2021 EPA study on Climate Change and Social Vulnerability in the United States, low income individuals are more likely to live in areas with the highest increases in mortality rates due to climate-driven changes in extreme temperatures as well as the highest rates of labor hour losses for weather-exposed workers. Further, residents in rural communities will naturally have less access to public support in case of emergencies and will have fewer resources to repair or prevent damage to their homes.

The City of Spartanburg strives to inform and prepare the general public for multi-hazard mitigation. There are online venues (including the City Emergency Services website and free Community Connect service, City of Spartanburg social media pages, the Spartanburg County Emergency Management website, Everbridge Emergency Notifications system, and social media pages, Spartanburg VOAD website in collaboration with the South Carolina VOAD website and social media pages) that disseminate numerous informational guidebooks, videos, and emergency resources to build disaster resiliency in the community.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan outlines the City of Spartanburg's goals and objectives for housing and community development activities over the next five years of the 2024-2028 Consolidated Plan. These activities will address the City's priority needs as identified through the needs assessment, market analysis, and citizen participation process. The City and its partners have developed a long-term strategy for revitalizing the City's older and long neglected neighborhoods. CDBG and HOME funds will leverage other resources such as the provides State and Local Fiscal Recovery Funds and HOME American Rescue Plan (HOME-ARP) in order to maximize impact. The plan prioritizes the needs of low- and moderate-income and special needs households and any potential services that would improve their quality of life.

Target Geographies/Neighborhoods identified where specific attention will be given over the five-year period were the Highland, Northside, West Main, and Hospital/Wofford Opportunity Zones as well as low/mod block group tracts citywide. Specific goals for housing and community development activities have been identified for each neighborhood and appropriate funding will be allocated to these activities. A summary of how the City's geographic targets were identified is detailed in the SP-10.

The following four (4) priority needs and associated goals form the basis of the Strategic Plan.

Priority Need: Public Improvements

1A Expand & Improve Public Infrastructure

1B Improve Access to Public Facilities

Priority Need: Preserve & Develop Affordable Housing

2A Provide for Owner Occupied Housing Rehab

2B Increase Homeowner Housing Opportunities

2C Increase Renter Housing Opportunities

2D Reduce Slum & Blight in Residential Areas

Priority Need: Public Services & Quality of Life Improvements

3A Provide Services for LMI & Special Needs

Priority Need: Effective Program Management

4A Effective Program Management

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	Low/Mod Block Group Tracts
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Low/Mod Block Group Tracts are defined by HUD CDBG regulations, whereby the majority of the residents are at least 51% low- to moderate-income. A map of these tracts as well as a tract list has been included at the end of this section.
	Include specific housing and commercial characteristics of this target area.	As reported in the MA-10, the housing stock in the City of Spartanburg is primarily single-family 1-unit detached structures. There is a need for 2-4 unit family housing and multi-family buildings. The vast majority of the housing stock consists of older units as 75% of owner-occupied housing and 62% of renter-occupied housing were built before 1980. Renter-occupied housing tends to be slightly newer than owner-occupied units. The MA-15 reports that the median home value in the City is \$165,000, which is an increase of 40% over the past decade. The commercial space throughout the City ranges from small retail stores to large office buildings in the downtown area, many of which house government offices.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City held a robust citizen participation process which helped to determine the housing and community development needs in Spartanburg. This included public meetings, a public hearing and a public comment period to allow citizens an opportunity to make comments. Further, a needs assessment survey was made available for both the public and local stakeholders. Targeting low income neighborhoods was a priority.

	Identify the needs in this target area.	The priority needs identified for City low/mod block group tracts are; Expand and Improve Public Infrastructure and Facilities; Preserve and Develop Affordable Housing; and Public Services and Quality of Life Improvements. The NA-10 has identified housing cost burden as the biggest housing issue by far, and the MA-10 reports that the housing stock in the City is much older and subject to required maintenance. These factors point to the need for affordable housing programs and for the preservation of housing for LMI households. Finally, the City has a need to address homelessness in Spartanburg.
	What are the opportunities for improvement in this target area?	The expansion and improvement of adequate public infrastructure and facilities is essential to addressing the needs of Spartanburg's low-income neighborhoods. These improvements help to create a suitable living environment and increase accessibility in the area, which in turn may invite further investment into the area. Affordable housing development, redevelopment and preservation are some of the greatest needs for the low-moderate income residents of Spartanburg and would improve the living situation of residents. Public service program development is a high priority as it will help with economic growth, education, and improvements to the quality of life of LMI residents in Spartanburg.
	Are there barriers to improvement in this target area?	The main barrier to improvement in the target community is a general lack of funding sources beyond the existing CDBG and HOME allocation.
2	Area Name:	Highland
	Area Type:	Opportunity Zone
	Other Target Area Description:	Opportunity Zone
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Census Tract 208. Please see attached Target Geographies Map.

T	
Include specific housing and commercial characteristics of this target area.	The area is mainly residential with small local churches scattered throughout with limited commercial enterprises located along main roads. The area has significant residential and commercial vacancy including many boarded-up houses and commercial buildings.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City held a robust citizen participation process which helped to determine the housing and community development needs in Spartanburg. This included public meetings, a public hearing and a public comment period to allow citizens an opportunity to make comments. Further, a survey was made available for both the public and local stakeholders. Targeting low income neighborhoods was a priority.
	This community was also selected as a target area through collaborative efforts made by City staff, partner organizations, neighborhood stakeholders and City Council.
Identify the needs in this target area.	The needs in this community include public facilities and infrastructure improvements as identified in the NA-50. Public services that promote job skills training, recreational opportunities, transportation and access to health care are also a need. Assistance with housing repairs and rehabilitation has also been identified as a need as housing is very old in Spartanburg.
What are the opportunities for improvement in this target area?	In most target areas, substandard housing conditions can be identified. The need is for public assistance in bringing these dilapidated dwellings both up to building code and to appropriate hygienic and humane living standards. In some cases the units are not structurally sound.
Are there barriers to improvement in this target area?	The main barrier to improvement in the target community is a general lack of funding sources in addition to the existing CDBG and HOME allocation.
Area Name:	Northside
Area Type:	Opportunity Zone
Other Target Area Description:	Opportunity Zone
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Comprehensive
Other Revital Description:	

Identify the neighborhood boundaries for this target area.	Census Tract 204. Please see attached Target Geographies Map.
Include specific housing and commercial characteristics of this target area.	The area is mainly residential with small local churches scattered throughout with limited commercial enterprises located along main roads. The area has significant residential and commercial vacancy including many boarded up houses and commercial buildings.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City held a robust citizen participation process which helped to determine the housing and community development needs in Spartanburg. This included public meetings, a public hearing and a public comment period to allow citizens an opportunity to make comments. Further, a survey was made available for both the public and local stakeholders. Targeting low income neighborhoods was a priority. This community was also selected as a target area through collaborative efforts made by City staff, partner organizations, neighborhood stakeholders and City Council.
Identify the needs in this target area.	The needs in this community include public facilities and infrastructure improvements as identified in the NA-50. Public services that promote job skills training, recreational opportunities, transportation and access to health care are also a need. Assistance with housing repairs & rehabilitation has also been identified as a need as housing is very old in Spartanburg.

	What are the opportunities for improvement in this target area?	The Northside community experiences substandard housing conditions in both residential and commercial buildings. The need is for public assistance in bringing these dilapidated dwellings and commercial structures both up to building code and to appropriate hygienic and humane living standards. In addition, some of the units are not structurally sound.
		Public improvements will improve the quality of life for residents and invite further investments into the area. The housing program will help develop new affordable housing opportunities and promote the preservation of affordable housing through rehabilitation activities.
		Opportunity Zones are designed to encourage long-term private investments in low-income communities, providing a federal tax incentive for taxpayers who reinvest unrealized capital gains into Opportunity Funds, which are specialized vehicles dedicated to investing in specially designated low-income areas.
	Are there barriers to improvement in this target area?	The main barrier to improvement in the target community is a general lack of funding sources beyond the existing CDBG and HOME allocation.
4	Area Name:	West Main
	Area Type:	Opportunity Zone
	Other Target Area Description:	Opportunity Zone
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Census Tract 205. Please see attached Target Geographies Map.
	Include specific housing and commercial characteristics of this target area.	The target area is mainly made up of residential homes just west of downtown. The eastern part of the target area closest to downtown has government buildings, retail shops, and commercial buildings.
		l

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City held a robust citizen participation process which helped to determine the housing and community development needs in Spartanburg. This included public meetings, a public hearing and a public comment period to allow citizens an opportunity to make comments. Further, a public survey was made available for both the public and local stakeholders. Targeting low income neighborhoods was a priority. This target area is also one of the four Opportunity Zones in the City.
Identify the needs in this target area.	The needs in this community include public facilities and infrastructure improvements as identified in the NA-50. Public services that promote job skills training, recreational opportunities, transportation, and access to health care are also a need. Assistance with housing repairs and rehabilitation has also been identified as a need as the city's housing stock is very old.
What are the opportunities for improvement in this target area?	Public improvements will improve the quality of life for residents and invite further investments into the area. Housing program will help develop new affordable housing opportunities and promote the preservation of affordable housing through rehab activities.
	Opportunity Zones are designed to encourage long-term private investments in low-income communities, providing a federal tax incentive for taxpayers who reinvest unrealized capital gains into Opportunity Funds, which are specialized vehicles dedicated to investing in specially designated low-income areas.
Are there barriers to improvement in this target area?	The main barrier to improvement in the target community is a general lack of funding sources beyond the existing CDBG and HOME allocation.
Area Name:	Hospital/Wofford
Area Type:	Opportunity Zone
Other Target Area Description:	Opportunity Zone
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Comprehensive
Other Revital Description:	

Identify the neighborhood	Census Tract 203.01. Please see attached Target Geographies
boundaries for this target area.	Мар.
Include specific housing and commercial characteristics of this target area.	The target area is home to Spartanburg Regional Medical Center as well as Wofford College and its campus. The western part of the target area is made up of residential housing.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City held a robust citizen participation process which helped to determine the housing and community development needs in Spartanburg. This included public meetings, a public hearing, and a public comment period to allow citizens an opportunity to make comments. Further, a public survey was made available for both the public and local stakeholders. Targeting low income neighborhoods was a priority. This target area is also one of the four Opportunity Zones in the City.
Identify the needs in this target area.	The needs in this community include public facilities and infrastructure improvements as identified in the NA-50. Public services that promote job skills training, recreational opportunities, transportation, and access to health care are also a need. Assistance with housing repairs and rehabilitation has also been identified as a need as the city's housing stock is very old.
What are the opportunities for improvement in this target area?	Public improvements will improve the quality of life for residents and invite further investments into the area. The housing program will help develop new affordable housing opportunities and promote the preservation of affordable housing through rehab activities. Opportunity Zones are designed to encourage long-term
	private investments in low-income communities, providing a federal tax incentive for taxpayers who reinvest unrealized capital gains into Opportunity Funds, which are specialized vehicles dedicated to investing in specially designated low-income areas.
Are there barriers to improvement in this target area?	The main barrier to improvement in the target community is a general lack of funding sources beyond the existing CDBG and HOME allocation.

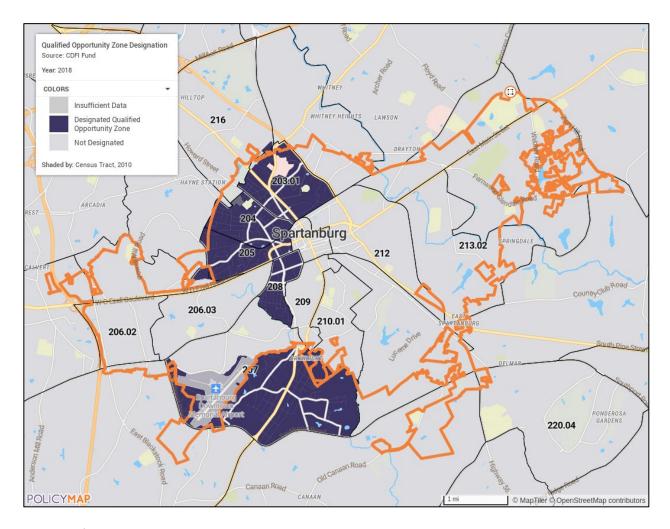
General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

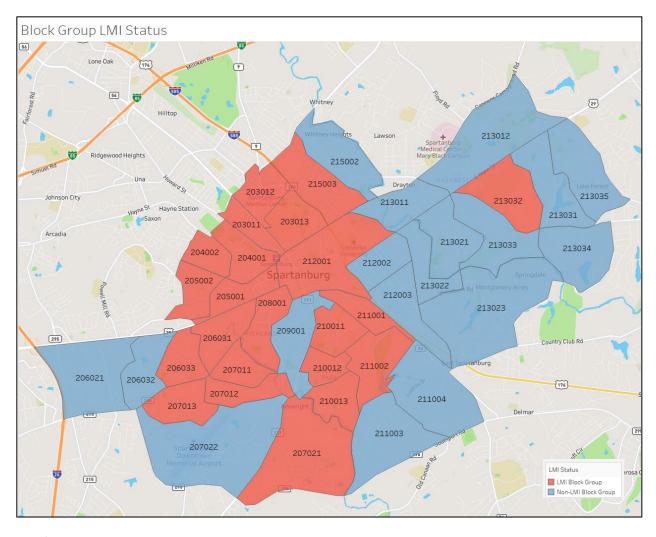
Other than the four Opportunity Zones, the City of Spartanburg does not allocate funding based solely on geographic requirements. However, when planned activities are intended to serve individuals or households directly, they must meet income qualifications, as well as live within the City limits, in order to receive assistance from the program. In these instances, City and/or subrecipient organization staff will complete an in-take and eligibility status review of each applicant before the activity is initiated.

When the City has identified public facilities and infrastructure improvement activities, the activities will serve a community or neighborhood. These activities are said to have an "area-wide" benefit. Per HUD requirements, these areas must be within an eligible census block group tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are at least 51% low- to moderate-income.

To determine census block group tracts, the City will be utilizing HUD's CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible tracts within the jurisdiction. The identified census block group tracts that are considered low-moderate income can be found on the HUD Exchange website at: https://www.hudexchange.info/programs/acs-low-mod-summary-data/



Opportunity Zones



Low/Mod Block Group Tracts HUD LMISD 2023

TRACT	BLKGRP	KGRP LOW/MOD %		
020701	2	89%		
020301	2	87%		
021001	1	85%		
020800	1	82%		
021303	2	82%		
021001	2	81%		
020301	1	79%		
020400	1	78%		
022006	1	77%		
020702	1	76%		
020400	2	76%		
021500	3	75%		
020301	3	69%		
020500	2	68%		
021700	3	68%		
020603	3	66%		
021001	3	66%		
020701	3	65%		
021700	2	64%		
020500	1	64%		
022003	2	61%		
021100	1	60%		
020601	1	59%		
021100	2	59%		
021600	1	57%		
020603	1	57%		
020701	1	54%		
021200	1	53%		
020701	2	89%		

HUD LMISD 2023

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Public Improvements			
	Priority Level	Moderate			
	Population	Extremely Low Low Moderate			
	Geographic Areas Affected	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford			
	Associated Goals	1A Expand & Improve Public Infrastructure 1B Improve Access to Public Facilities			
	Description	There is a need for public facilities and infrastructure improvements in LMI neighborhoods. The City of Spartanburg is one of the main urban centers in the area and is surrounded by rural areas, however much of the existing infrastructure is aging. Public facility improvements will include neighborhood facilities, community centers, parks and recreational centers. Public infrastructure includes improvements to streets, sidewalks, water/sewer systems and ADA improvements.			
	Basis for Relative Priority	As identified in the NA-50, there is a need to make public facility and infrastructure improvements since much of the existing infrastructure is aging. Low/mod areas in the City are some of the most underserved areas, and investment into public facilities and infrastructure will help improve the quality of life for residents, promote a healthy and safe environment, and invite more private investments into the area.			
		The surrounding areas around the City have also experienced growth over the past decade, and with that comes increased traffic as the City grows as an urban center for the region. With the increase in traffic, there is a need for roads to be improved where possible to accommodate higher traffic volumes.			
2	Priority Need Name	Preserve & Develop Affordable Housing			
	Priority Level	High			

Population	Extremely Low			
·	Low			
	Moderate			
	Middle			
	Large Families			
	Families with Children			
	Elderly			
Geographic Areas	Low/Mod Block Group Tracts			
Affected	Highland			
	Northside			
	West Main			
	Hospital/Wofford			
Associated Goals	2A Provide for Owner Occupied Housing Rehab			
	2B Increase Homeowner Hsng Opportunities			
	2C Increase Renter Housing Opportunities			
	2D Reduce Slum & Blight in Residential Areas			
Description	There is a need to increase affordable housing opportunities in the City of			
	Spartanburg through the development of new housing, homebuyer			
	opportunities, and housing rehabilitation activities. The largest housing			
	problem identified in the NA is high housing cost burden among LMI			
	households, and these activities are designed to grow or preserve the			
	affordable housing stock in the City.			

Basis for Relative Affordable housing is by far the highest priority need for LMI residents living **Priority** in the City of Spartanburg. Through the analysis in the NA/MA, housing cost burden consistently ranked as the biggest housing issue. These are many households throughout the city paying 30% or more of their income towards housing costs. One in five (21.6%) homeowners with a mortgage are cost burdened. Renters are much more likely to experience cost burden as over half (51.6%) are cost burdened. This housing problem is more pronounced for LMI households as housing costs rise, increasing the likelihood of housing instability. With the limited amount of available funds, the development of new housing may not always be feasible. Since maintaining affordable housing is a high priority, housing rehabilitation activities become necessary for LMI households. Currently, 75% of owner-occupied units (6,213) and 62% of renter-occupied units (4,576) were built before 1980. As aging homes are unlikely to be replaced with new housing in significant numbers, preservation of older units are an important strategy to maintaining affordable housing in the City. LMI households also often reside in older and aging housing units, and without assistance may lack the finances to maintain their homes. **Priority Need** Public Services & Quality of Life Improvements Name Moderate **Priority Level Population** Extremely Low Low Moderate Middle **Large Families** Families with Children Elderly **Public Housing Residents** Chronic Homelessness Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development

	Geographic Areas Affected	Low/Mod Block Group Tracts Highland Northside West Main				
		Hospital/Wofford				
	Associated Goals	3A Provide Services for LMI & Special Needs				
	Description	Essential public services and community development programs will help improve the quality of life for LMI households and special needs groups such the elderly, persons with a disability, and those at-risk of homelessness. Public service programs may provide vital services such as housing stability programs, homeless prevention services, youth and elderly programs, and programs that improve the economic self-sustainability.				
	Basis for Relative Priority	Through community participation of residents and consultation from local stakeholder partners and organizations the need for vital and essential public services were identified. Households that are most vulnerable and at-risk of homelessness will be prioritized. The importance of reducing housing instability was identified in the NA, and fair housing activities and housing service programs will be provided as needed for LMI residents.				
4	Priority Need Name	Effective Program Management				
	Priority Level	Moderate				
	Population	Extremely Low Low Moderate				
	Geographic Areas Affected	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford				
	Associated Goals	4B Effective Program Management				
	Description	The City will provide general administration of the CDBG and HOME program through monitoring subrecipients; working to remain in compliance with grant rules and regulations; and keeping strict grant based accounting. Comprehensive planning requirements will include the development of annual action plans, a year-end evaluation of the performance of the programs through annual reports, and following and meeting citizen participation requirements.				

Basis for Relative	There is a need to provide effective program management of HUD grant			
Priority	programs, which will ensure the successful performance of the CDBG and			
	HOME grant programs. By following grant rules for monitoring, compliance			
	and timeliness the City will work towards meeting all objectives set by the			
	programs.			

Table 48 – Priority Needs Summary

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing	Market Characteristics that will influence			
Туре	the use of funds available for housing type			
Tenant Based Rental Assistance (TBRA)	The need for TBRA for LMI and households at-risk of housing instability is influenced by: - High rates of housing cost burden and severe housing cost burden as reported in the NA-10, especially for LMI renters. - The MA-15 reports that Fair Market Rents (FMR) are still out of reach for the lowest income earners. - The MA-15 also reports there is a shortage of affordable rental units for lower income households. - The cost of rent has increased tremendously in the past decade. Median contract rent has increased 51% from 2012 to 2022.			
TBRA for Non-	 A shortage of Housing Choice Vouchers in the area. Large waiting lists for public housing and Housing Choice Vouchers. See above.			
Homeless Special Needs				
New Unit Production	 New Unit Production for LMI households is influenced by: A shortage of affordable housing as reported in the NA-10. Housing cost burden is the biggest housing issue in the City. A shortage of affordable rental housing in the City as reported in the MA-15. The cost of rent has increased tremendously in the past decade. Median contract rent has increased 51% from 2012 to 2022. If public infrastructure such as water and sewer lines are installed and in place. There is a need to expand infrastructure to meet these needs. 			

Rehabilitation	Housing Rehabilitation activities for LMI households is influenced by:			
	 The aging housing stock. There is a significant number of units that 			
	may be in need of repairs and maintenance. As reported in the MA,			
	there are over 6,200 owner-occupied units (75%) and 4,500 renter-			
	occupied units (62%) built before 1980. LMI households often resid			
	in older and aging housing units, and without assistance may lack			
	the finances to maintain their homes.			
	- New home purchase opportunities that may not be available for			
	lower income households.			
	- The dependence on securing rehab services from organizations to			
	implement the Emergency Repair Program.			
	- A higher risk of lead-based paint hazards for older housing built			
	before 1978.			
Acquisition, including	Acquisition, for the purpose of rehabilitation for LMI households is			
preservation	influenced by:			
	- The cost of new housing, which is prohibitive for lower income			
	households.			
	- See above for housing rehab.			

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Spartanburg is an entitlement community, and anticipates it will receive the following community planning and development funds from the U.S. Department of Housing and Urban Development (HUD) in PY 2024.

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)

These grant programs will support community development programs, affordable housing development and preservation, and address homelessness. PY 2024 is the first year of the 2024-2028 Consolidated Plan, and the City anticipates it will receive similar amounts in each year of the Consolidated Plan period.

Anticipated Resources

Program	Source of	Source of Uses of Funds		Expected Amount Available Year 1			Expected	Narrative Description
	Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income: \$	Resources:	\$	Available	
			\$		\$		Remainder	
							of ConPlan \$	
CDBG	public -	Acquisition						PY 2024 is the first year of the
ı	federal	Admin and Planning						ConPlan, and the expected
		Economic Development						amount available for the
		Housing						remainder of the plan is 4x
		Public Improvements						times the annual allocation.
		Public Services	642,598	0	0	642,598	2,570,392	
HOME	public -	Acquisition						PY 2024 is the first year of the
	federal	Homebuyer assistance						ConPlan, and the expected
		Homeowner rehab						amount available for the
		Multifamily rental new						remainder of the plan is 4x
		construction						times the annual allocation.
		Multifamily rental rehab						
		New construction for						
		ownership						
		TBRA	200,630	0	0	200,630	802,520	

Table 50 - Anticipated Resources

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

In order to maximize the effectiveness of its formula grant funding, the City of Spartanburg has formed working partnerships with local nonprofit organizations, private lending institutions, and various agencies that receive funding from other private, state, and local sources. The City encourages the participation of private enterprise and nonprofit entities in providing affordable housing and housing assistance. This is accomplished by leveraging funds made available through the CDBG and HOME programs. There is no matching requirement for the CDBG program. For HOME, HUD has historically determined that the City of Spartanburg meets the criteria of fiscal distress. The HOME match reduction is reviewed annually. In FY 2023, the City received a 100% reduction of the 25% match requirement. In previous years the City received a 50% reduction. Currently the City utilizes excess HOME match from prior fiscal years to meet the required match amount. A recent example was an appraised/real land property for a HOME activity which resulted in one affordable rental unit. This match contributed \$15,000, and increased the excess match to be carried over into the new FY to \$1,333,561.

American Rescue Plan Act (ARPA) funds will be leveraged to maximize the impact of the City's annual allocation of HOME and CDBG funding as well as the HOME-ARP funding. \$2,500,0000 in ARPA funding has been set-aside for affordable housing programs. ARPA funds will be used for development of housing for homeownership and rental housing, and owner-occupied housing repairs. CDBG funds can be used for site improvements, while HOME, HOME-ARP, and ARPA funds can subsidize the construction or preservation of affordable 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

Several public facilities offer services to enhance the quality of life for all residents of Spartanburg. The Dr. T.K. Gregg Center is a newly constructed public recreation center. The building and the services provided there are vital to the current redevelopment plans of the Northside community. The C.C. Woodson Community Center and James D. Thornton Activity Center both provide educational and recreational programming for youth, adults, and seniors. These centers can be reserved for private events and often serve as locations for community meetings, educational workshops, and events to share City plans and activities. The City has acquired several vacant lots in residential neighborhoods in its previous and ongoing efforts to reduce slum and blight. The City works with non-profit and private housing developers to create plans for affordable housing and other beneficial developments to those neighborhoods.

Discussion

The City of Spartanburg will continue to seek additional resources to address priority needs in the community.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity	Role	Geographic Area
	Туре		Served
City of Spartanburg	Government	Planning	Jurisdiction
		neighborhood improvements	
		public facilities	
		public services	
Spartanburg Housing	PHA	Planning	Jurisdiction
Authority		Rental	
United Housing	Continuum of Care	Homelessness	Region
Connections (UHC)		public services	
SPARTANBURG	Government	Planning	Jurisdiction
COUNTY		neighborhood improvements	
United Way of the	Non-profit	Planning	Jurisdiction
Piedmont	organizations	Homelessness	
		Non-homeless special needs	
		public services	
Community Works	Developer	Owner	Jurisdiction
Carolina		Rental	
Northside	Developer	Owner	Jurisdiction
Development Group		Rental	
Highland	Non-profit	Non-homeless special needs	Jurisdiction
Neighborhood	organizations	public services	
Association			
Bethlehem Center	Non-profit	Non-homeless special needs	Jurisdiction
	organizations	public services	
Project R.E.S.T.	Non-profit	Homelessness	Jurisdiction
	organizations	public services	
SC Legal Services	Departments and	Non-homeless special needs	Jurisdiction
Spartanburg Office	agencies	public services	
SC Department of	Departments and	Planning	Region
Health and	agencies	neighborhood improvements	
Environmental Control			
(DHEC)			

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Spartanburg's Neighborhood Services Department has healthy and ongoing coordination with affordable housing and social service agencies and continues to seek opportunities to connect with other organizations to strengthen this network. To overcome gaps in services, the City will continue to provide opportunities for public, private, and governmental organizations to come together and share information, advocate for issues of concern, leverage resources, and address barriers associated with providing more affordable housing. The City invites these agencies and organizations to community development public meetings and hearings in order to gain insight into housing and community development needs in Spartanburg.

While there is a wide array of services available, there continues to be a need for funding outside of HUD CDBG and HOME funds. Acquiring the services of a qualified Community Housing Development Organization (CHDO) to work within the City has been difficult. A CHDO is a private nonprofit, community-based, service organization that has, or intends to obtain, staff with the capacity to develop affordable housing for the community it serves. With the current allocation of HOME funds, the City is limited in the affordable housing services it can deliver annually.

Availability of services targeted to homeless persons & persons with HIV & mainstream services

Homelessness Prevention	Available in the	Targeted to	Targeted to People
Services	Community	Homeless	with HIV
	Homelessness Prevent	ion Services	
Counseling/Advocacy	X	X	X
Legal Assistance	Χ	X	X
Mortgage Assistance	Χ	X	
Rental Assistance	Χ	Χ	
Utilities Assistance	X	X	
	Street Outreach S	ervices	
Law Enforcement	Х	Х	
Mobile Clinics			
Other Street Outreach Services			
	Supportive Serv	vices	
Alcohol & Drug Abuse	Χ	Χ	X
Child Care	Χ	Χ	
Education	Χ	Χ	X
Employment and Employment			
Training	Χ	X	X
Healthcare	Χ	X	X
HIV/AIDS	X	X	X
Life Skills	Χ	X	X
Mental Health Counseling	X	Χ	X
Transportation	X	Χ	X

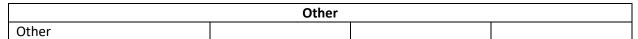


Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Spartanburg's Neighborhood Services Department supports United Housing Connections (UHC), which is the lead organization in the Continuum of Care (CoC) in the region. The CoC is responsible for planning and coordination of programs and service delivery systems in the region to assist the needs of homeless persons through local homeless services and housing providers.

The City uses data from the annual Point-in-time count to help guide the City's Annual Action Plan. The City collaborates with and funds several non-profits in the area that are dedicated to providing services to vulnerable populations such as the homeless, veterans, and families with children. The City is currently engaging the CoC and other stakeholders on a Homelessness Strategic Plan with the United Way, Spartanburg County, and the 1000 Feathers consulting group to provide a streamlined effort for services provided moving forward.

The City acknowledges that the number of services currently offered for special needs populations could be improved. These include services for children, women, chronically homeless individuals, elderly, and persons with disabilities (mental, physical, and developmental). The City has started a Homeless Engagement and Response Team and has hired an experienced Homeless Engagement Coordinator to advance these processes and guide activities.

Below is a list of nonprofits and agencies, and their services and activities with the homeless and individuals and households at-risk of becoming homeless:

PATH workers, through the Spartanburg Mental Health Center, will do street outreach to homeless people and provide them with crisis services, medication services, counseling sessions in the field or in the office, nursing appointments, and random drug screens.

New Horizons has a mobile van, which visits in Spartanburg twice a month, to bring medical care to homeless people. One of its stops is at the Downtown Rescue Mission.

Regenesis and St. Luke's Free Clinic also provide healthcare to people with very low-income.

SC Works provides work search and training opportunities. This is not limited to homeless people, but they are certainly part of the population taking advantage of the programs. The Veteran Reps. works with veterans and their families. Occasionally there are homeless vets that apply for help and the Veteran Reps. try to place them in housing.

Legal Services can help with prevention of homelessness when legal work is needed to prevent eviction or foreclosure. However, they cannot help if the eviction is because rent was not paid.

Homes for Life helps houses unaccompanied boys and tries to provide them with the skills and services needed to develop their readiness for self-sufficiency.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

As the local Continuum of Care (CoC) serving the region, United Housing Connections (UHC) coordinates with many partner organizations and agencies that work to meet the needs of the homeless population in the City of Spartanburg. The City also works with a large network of partners and nonprofits to meet the needs of its special needs population.

However, at this time, the City does not receive ESG or HOPWA funds and therefore is unable to provide any significant funding to combatting homelessness. The City does provide CDBG public service funding to various organizations that ultimately provide assistance to homeless persons. However, the City does not have an active program to end homelessness.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City of Spartanburg will continue to actively play a role in leading, monitoring, and providing technical assistance to the nonprofits and organizations that help to serve the citizens of the City.

Specific actions the City will take are:

- Work with non-profit organizations and homeless services providers to address community needs and provide public services designed to improve their quality of life and lower housing instability.
- The Neighborhood Services Department will work with other City departments to meet established goals in the plan, such as public facility and infrastructure improvements in low/mod areas.
- Identify housing services providers and developers including a CHDO to address the affordable housing needs of LMI residents.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
1 A Evenand 9			Non Housing	Low/Mad Black Croup		CDBC	Public Facility or Infrastructure
·	2024	2028	J	,			,
•			,		Improvements	\$200,000	Activities other than
Infrastructure			Development				Low/Moderate Income
				Northside			Housing Benefit: 10000
				West Main			Persons Assisted
				Hospital/Wofford			
1B Improve	2024	2028	Non-Housing	Low/Mod Block Group	Public	CDBG:	Public Facility or Infrastructure
Access to Public			Community	Tracts	Improvements	\$200,000	Activities other than
Facilities			Development	Highland			Low/Moderate Income
				Northside			Housing Benefit: 10000
				West Main			Persons Assisted
				Hospital/Wofford			
2A Provide for	2024	2028	Affordable	Low/Mod Block Group	Preserve &	HOME:	Homeowner Housing
Owner			Housing	Tracts	Develop	\$1,402,990	Rehabilitated: 150 Household
Occupied				Highland	Affordable		Housing Unit
Housing Rehab				Northside	Housing		
				West Main			
				Hospital/Wofford			
2B Increase	2024	2028	Affordable	Low/Mod Block Group	Preserve &	HOME:	Homeowner Housing Added: 5
Homeowner			Housing	Tracts	Develop	\$451,575	Household Housing Unit
Hsng				Highland	Affordable		
Opportunities				Northside	Housing		
• •				West Main			
	1A Expand & Improve Public Infrastructure 1B Improve Access to Public Facilities 2A Provide for Owner Occupied Housing Rehab 2B Increase Homeowner Hsng	1A Expand & 2024 Improve Public Infrastructure 1B Improve Access to Public Facilities 2A Provide for Owner Occupied Housing Rehab 2B Increase Homeowner Hsng	1A Expand & 2024 2028 Improve Public Infrastructure 2024 2028 Access to Public Facilities 2024 2028 2028 2028 2029 2029 2029 2029 2029	YearYear1A Expand & Improve Public Infrastructure20242028Non-Housing Community Development1B Improve Access to Public Facilities20242028Non-Housing Community Development2A Provide for Owner Occupied Housing Rehab20242028Affordable Housing2B Increase Homeowner Hsng20242028Affordable Housing	YearYearYearLow/Mod Block Group1A Expand & Improve Public Infrastructure20242028Non-Housing CommunityLow/Mod Block Group1B Improve Access to Public Facilities20242028Non-Housing Community DevelopmentLow/Mod Block Group7 Facilities1 Facilities1 FacilitiesLow/Mod Block Group2A Provide for Owner Occupied Housing Rehab20242028Affordable HousingLow/Mod Block Group2B Increase Homeowner Homeowner Hsng Opportunities20242028Affordable HousingLow/Mod Block Group2B Increase Hsng Opportunities20242028Affordable HousingLow/Mod Block Group1 Facts Highland HousingTracts HousingLow/Mod Block Group2 Fince Tracts Highland HousingTracts Highland Housing1 Facts Highland NorthsideHighland Housing	YearYearYearAddressed1A Expand & Improve Public Infrastructure20242028Non-Housing CommunityLow/Mod Block Group TractsPublic ImprovementsInfrastructureDevelopment InfrastructureHighland Northside West Main Hospital/WoffordWest Main Hospital/Wofford1B Improve Access to Public FacilitiesAccess to Public Public ImprovementsCommunity Tracts ImprovementsFacilitiesDevelopment Highland Northside West Main Hospital/WoffordPreserve & Develop Housing TractsOwner Occupied Housing RehabAffordable Housing West Main Hospital/WoffordAffordable Housing West Main Hospital/Wofford2B Increase Homeowner Hsng Opportunities2024 2028 Affordable Housing Tracts Highland Affordable Housing Highland Northside West MainPreserve & Develop Affordable Housing Highland Affordable Housing West Main	YearYearYearLow/Mod Block GroupPublicCDBG:Improve Public Infrastructure2024 Brown Development Brown Develop Brown Development Brown Develop Brown Deve

Sort	Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
Order		Year	Year			Addressed		
5	2C Increase	2024	2028	Affordable	Low/Mod Block Group	Preserve &	HOME:	Rental units constructed: 15
	Renter Housing			Housing	Tracts	Develop	\$451,575	Household Housing Unit
	Opportunities				Highland	Affordable		
					Northside	Housing		
					West Main			
					Hospital/Wofford			
6	2D Reduce	2024	2028	Affordable	Low/Mod Block Group	Preserve &	CDBG:	Buildings Demolished: 30
	Slum & Blight in			Housing	Tracts	Develop	\$320,000	Buildings
	Residential				Highland	Affordable		
	Areas				Northside	Housing		
					West Main			
					Hospital/Wofford			
7	3A Provide	2024	2028	Non-Housing	Low/Mod Block Group	Public	CDBG:	Public service activities other
	Services for LMI			Community	Tracts	Services &	\$450,000	than Low/Moderate Income
	& Special Needs			Development	Highland	Quality of Life		Housing Benefit: 500 Persons
					Northside	Improvements		Assisted
					West Main			
					Hospital/Wofford			
8	4A Effective	2024	2028	Non-Housing	Low/Mod Block Group	Effective	CDBG:	Other: 5
	Program			Community	Tracts	Program	\$640,000	
	Management			Development	Highland	Management	HOME:	
					Northside		\$100,000	
					West Main			
					Hospital/Wofford			

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	1A Expand & Improve Public Infrastructure				
	Goal Description	The City will expand and improve public infrastructure through activities in low/mod areas. Activities may include ADA compliance for curb ramps, streets, sidewalks, and roadway safety projects.				
2	Goal Name	1B Improve Access to Public Facilities				
	Goal Description	The City will improve access to public facilities in low/mod areas. Activities may include improvements to parks and recreation centers, neighborhood facilities, and homeless shelters.				
3	Goal Name	2A Provide for Owner Occupied Housing Rehab				
	Goal Description	The City will partner with housing service providers and nonprofit organizations to rehabilitate owner-occupied housing, including emergency repairs and minor structural rehab. Housing rehab activities will target LMI households below 60% AMI				
4	Goal Name	2B Increase Homeowner Housing Opportunities				
	Goal Description	The City will provide for new homeowner housing opportunities such as site improvements, the construction of housing and/or direct financial assistance. New homeowner housing opportunities will target LMI households between 60% and 80% AMI.				
5	Goal Name	2C Increase Renter Housing Opportunities				
	Goal Description	The City will partner with housing service providers and nonprofit organizations to develop affordable rental housing units through site improvements, new construction, and rehabilitation Rental housing opportunities will target LMI households.				
6	Goal Name	2D Reduce Slum & Blight in Residential Areas				
	Goal Description	The City will demolish buildings condemned due to code enforcement regulations in an effort to reduce slum and blight in low-moderate income areas.				

7	Goal Name	3A Provide Services for LMI & Special Needs
	Goal Description	The City will fund non-profit organizations providing public services to LMI households and special need groups such as persons with a disability, the elderly and those at-risk of homeless.
8	Goal Name	4A Effective Program Management
	Goal Description	The City will provide for effective program management of the CDBG and HOME program. Activities will include the planning of programs, compliance, monitoring and reporting.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Over the next five years of the 2024-2028 Consolidated Plan, the City estimates that it will assist low-to moderate-income households with affordable housing activities:

Homeowner Housing Rehabilitated: 150 Household Housing Unit

Homeowner Housing Added: 5 Household Housing Unit Rental units constructed: 15 Household Housing Unit

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Spartanburg Housing (SH) serves the City of Spartanburg. The mission of the Spartanburg Housing is similar to that of Neighborhood Services: To promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Spartanburg Housing has recently rebranded from the former Spartanburg Housing Authority (SHA) in order to reflect their evolution while recommitting to their focus of housing. Spartanburg Housing currently serves over 3,400 families under its various housing programs. The housing authority manages approximately 527 Public Housing units in communities throughout the City of Spartanburg. Spartanburg Housing's Public Housing comes in all sizes and types including duplexes, garden style apartments and townhomes in various bedroom sizes, and high-rise apartments for elderly residents. The housing authority also has accessible units for individuals with disabilities. If there is a need to provide or increase the number of accessible units under Section 504, Spartanburg Housing will make reasonable accommodations.

Activities to Increase Resident Involvements

The Neighborhood Services Department often collaborates with Spartanburg Housing and other agencies to provide opportunities for Homebuyer education seminars and workshops. The City also provides CDBG funding to non-profit organizations that provide financial counseling and ongoing case management to gain the financial stability needed to pursue homeownership. These organizations connect residents with down payment assistance programs offered through the City and partner agencies including the Northside Development Group and Spartanburg Regional.

Spartanburg Housing's Family Self-Sufficiency Program (FSS) helps low-income families attain a better standard of living while promoting self-sufficiency. Participants sign a five-year contract that sets out specific goals to be accomplished during the time period including first time employment, higher education, establishment of a self-sustaining atmosphere, and the opportunity to establish and build an interest-bearing escrow account. The account becomes available once the family has completed the FSS program and has been free of all public aid for 12 months. The City of Spartanburg works toward ensuring there is a decent and affordable housing stock for participants to pursue.

Is the public housing agency designated as troubled under 24 CFR part 902?

Spartanburg Housing is not designated as a troubled PHA.

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Although public policies are intended to positively address the needs of citizens in a jurisdiction, there are times when they may have an unforeseen negative effect on certain aspects of the community, which in this case are affordable housing and residential investment. Public policies that negatively affect affordable housing and residential investment become a barrier to creating affordable housing in the area. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

To identify these negative effects and further the purposes of the Fair Housing Act, the U.S. Department of Housing and Urban Development (HUD) made it a legal requirement that entitlement grantees affirmatively further fair housing. The primary tool communities have for identifying contributing factors that lead to negative effects on the community is the Analysis of Impediments to Fair Housing Choice (AI).

The AI reviews the community demographics, market availability, public and private policies, practices, and procedures affecting fair housing choice and affordable housing. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices based on race, color, religion, sex, disability, familial status, or national origin. The AI serves as the basis for fair housing planning, provides essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

To ensure that all residents in the City of Spartanburg are protected under state and local law and adhere to HUD regulations on fair housing as required by CPD entitlement grants, the City has taken steps to promote fair housing and educate its leadership, staff, and residents on what HUD defines as fair housing and discrimination in housing.

In 2019, the City of Spartanburg, in partnership with the County and the Spartanburg Housing Authority came together to carry out the Joint Analysis of Impediments of Fair Housing Choice, which identified six impediments to fair housing in the region along with a table listing their associated contributing factors. Contributing factors are issues leading to an impediment that is likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors were also provided, along with goals, timelines, and responsible parties. Full details of the fair housing impediments can be viewed in the 2019 Joint Al. A list of the identified impediments is shown below:

- Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices
- Impediment #2: Neighborhoods Need Place-Based Community Investments
- Impediment #3: Need for Continued and Expanded Fair Housing Activities
- Impediment #4: Affordable Housing Planning Lacks Equity Focus
- Impediment #5: Limited Housing Options for People with Disabilities
- Impediment #6: Weak Job-Transit Connections

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The following actions will be made or have been undertaken to address affordable housing barriers and form partnerships with other local government, private, and non-profit organizations to implement these plans.

- Collaborate with Spartanburg Housing and the County to implement an ongoing landlord recruitment campaign for the Housing Choice Voucher program.
- Develop opportunities for property owner and tenant education through events, seminars, and the Fair Housing Hotline, which is managed by Neighborhood Services Staff.
- Support and accommodate proposed LIHTC developments in the jurisdiction, providing letters of support and gap financing where possible and appropriate.
- Give new affordable housing development priority consideration when it will be located in an area that increases access to new types of opportunities.
- Fund agencies that provide homeownership preparation and financial counseling for first-time homebuyers.
- Develop partnerships with credit counseling agencies to reach minority communities and build a pipeline of potential homebuyers.
- Meet with lenders and/or appraisers to inform them of goals for furthering fair housing and discuss lending barriers related to homeownership and community reinvestment in low-income neighborhoods.
- Monitor and provide financial support for the efforts of existing community-based organizations
 in offering fair housing enforcement and education related to the rights of people with disabilities.
- Review and comment on the annual PHA plan to ensure it is furthering affordable housing opportunities in high-opportunity areas.
- Develop alternate programs that may provide direct transportation linkages between housing and employment centers and potential funding sources.
- Coordinate with Target Areas to develop and support place-based community improvements.
- The City is currently going through its Comprehensive Planning process and has committed to an equity-focused plan that addresses current barriers.

Equity Plan

As noticed by HUD on February 9, 2023, entitlement communities will begin to develop Equity Plans, which will provide a fair housing analysis, goals and strategy, and community engagement. The Equity Plan will answer questions on demographics, segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAP), access to community assets, access to affordable housing opportunities, access to homeownership and economic opportunity, any discrimination or violations of civil rights, and local/state policies and practices that impact fair housing in the City of Spartanburg. The Equity Plan will help guide the goals of the five-year plan and provide strategies that the City will utilize to affirmatively further fair housing in Spartanburg.

SP-60 Homelessness Strategy – 91.215(d)

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

Addressing the emergency and transitional housing needs of homeless persons

The City of Spartanburg actively seeks opportunities and partnerships to address the need of additional emergency shelter and transitional housing in the community. The following service providers help address these needs in the City.

United Housing Connections, the local Continuum of Care (CoC), offers transitional housing for families in Spartanburg. Homeless persons in emergency and transitional housing in the City have access to all programs and services offered through the CoC.

Project R.E.S.T. has been a consistent partner with the City. This facility provides shelter for victims of rape and/or domestic violence and their dependents, in addition to providing counseling, supportive services, and case management in order to transition into stable housing.

Angel's Charge Ministry, with the help of the City, is working to develop two transitional housing units for women coming out of incarceration. Each unit will be able to house up to four women at a time. The establishment of increased transitional housing will increase both of the organization's capacity to reach more families and help them move along the path to sustainability, rather than staying in a shelter or on the streets.

GoForth Recovery provides ongoing transitional housing and case management for single men recovering from addiction. Their facility houses up to 16 men and their programs provide for transportation to appointments and employment to facilitate long-term independence.

Warriors Once Again provides transitional housing and supportive services to single veteran men in the City.

When budgets permit, the City will continue to dedicate funding to the operations and expansion of existing emergency shelters throughout the community. Whenever possible, the City provides CDBG public service funding to organizations in the CoC to support their ongoing initiatives, programs and operations.

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 Litter HEROS program created through H.E.A.R.T. connects homeless individuals to job and life skills training, while earning an income during that time. Participants in the program receive ongoing case management to secure housing and permanent employment during and after their completion of the program.

The City has recently completed and submitted a HOME-ARP Action Plan and anticipates increasing funding available for supportive services, access to affordable housing, and coordination amongst agencies to decrease the length of time that individuals and families experience homelessness. The plan highlighted the unmet housing needs of qualifying homeless populations and resources needed. Upon implementation of this plan, along with the development of the overall Homelessness Strategy, the City plans to increase the quantity and variety of housing options, which is a large barrier for those receiving supporting services and attempting to gain stable housing.

Representatives from various departments in the City of Spartanburg (including Neighborhood Services, Code Enforcement, and the City Manager's office) are active participants in the Homeless Taskforce. Spearheaded by the United Way of the Piedmont, this committee includes other local agencies, the county government, legal advisors, and law enforcement who serve as a network of community leaders that come together to assess the homelessness situation in the community to brainstorm and implement various tactics to be used strategically throughout the city and county. This diverse network provides greater insight to the needs and experiences of homeless persons, and allows for increased flow of information and resources to guide further actions and initiatives.

The City of Spartanburg has created the Homeless Engagement and Response Team (H.E.A.R.T.) that consists of staff and volunteers that focus on homeless outreach, particularly unsheltered persons in known sites in the City that homeless persons visit frequently. The goal is to assess their needs and connect these persons to the ongoing services and resources available. This outreach provides insight to gaps of services provided and guides the homeless strategy for the jurisdiction.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City of Spartanburg and CoC's partnership, along with ongoing communication with public institutions and systems of care guide the strategies used to prevent low-income individuals and families from becoming homeless. Some of these organizations include, but are not limited to Access Health, Spartanburg Mental Health, McKinney-Vento liaisons in the public schools, SC Department of Social

Services, and local law enforcement.

Through these partnerships, the CoC is able to identify persons and families who are at-risk of homelessness and connect them to available resources. These families may receive emergency assistance with rental and/or utility payments, referrals to income-based rental options, and applications for public benefits for which they may be eligible.

Below are a few additional assistance programs supported by the City for low-income families to avoid becoming homeless:

- The City provides funding for the United Way's Community Resource Coordinators. These
 caseworkers provide guidance on setting goals and priorities for their family and self to obtain
 financial sustainability and housing stability. The City also promotes the United Way of Piedmont's
 211 hotline, a central resource for all community needs. Residents can find resources for rent and
 utility assistance, food, social services, etc.
- The City supports the expansion of services and developments at the Opportunity Day Center to connect individuals to resources.
- The City is working with Angel's Charge Ministry to develop transitional housing for women recently released from correction facilities.
- H.O.P.E Ministries receives funding from the CDBG Public Services allocation. This organization
 operates an all-male transitional house, focusing on men recently discharged from corrections
 programs and institutions, and connects them with a job-training program for employment while
 living in the house.
- The Bethlehem Center receives funding from the CDBG Public Services allocation. The Center serves as a resource hub for the Highland Community and all youth attending after-school and summer programs. In addition to youth development, the Bethlehem Center coordinates food supplementation and connection to social services and resources as needed.
- SC Legal Services receives CDBG Public Service allocations and can help with prevention of homelessness when legal work is needed to prevent eviction or foreclosure

The City of Spartanburg also provides help for those that are extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care. The City has staffed a dedicated Homeless Outreach Coordinator that serves as the liaison to the Cherokee Union Spartanburg chapter and encourages engagement from local service providers to those experiencing homelessness. This staff member also coordinates with the ongoing Homeless Court started in the City and refers potential candidates to go through this unique process. Candidates for homeless court are provided resources and held accountable for goals to achieve self-sustainability in lieu of being charged with minor offenses. At court sessions, which are usually held at a location that provides services to homeless persons, other agencies are often in attendance to provide additional information and resources for the candidates and others who may need assistance. These services help these individuals reintegrate into the community and avoid becoming homelessness.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City of Spartanburg offers a Lead-Safe Spartanburg program which provides assistance to LMI families. This program is funded through the Lead-Based Paint Hazard Reduction Grant through the Office of Healthy Homes and Lead Hazard Control. Through this program, income-eligible households with a child under the age of six, or a pregnant female living in a home built before 1978, can submit an application for a free Healthy Homes and Lead Inspection/Risk Assessment at their home to identify any hazards and develop a work plan to mitigate such hazards using proper safety measures and protocols.

The City plans to apply for a new round of HUD lead-based paint hazard control and Healthy Homes funding during the next application period. Because housing in Spartanburg is very old, the risk of lead-based paint hazards will remain high.

More information on the Lead-Safe Spartanburg program as well as educational material and resources can be found on the City's webpage at: https://www.cityofspartanburg.org/214/Lead-Paint-Removal-Assistance#:~:text=For%20more%20information%20or%20to,5010%20or%20email%20Lead%20Safe.

The City will also address lead-based paint hazards present for any home built before 1978 undergoing housing rehabilitation activities through the CDBG or HOME programs. The City's Building Department also assists the South Carolina Department of Health and Environmental Control (DHEC) during its construction inspection process. All housing units undergoing emergency repairs or rehabilitation through the CDBG or HOME program that were built prior to 1978 will have a lead inspection/risk assessment before any physical work begins on the unit and will practice Lead Safe practices as needed. If eligible, they can be referred to the City's Lead-Based Paint Hazard Reduction Program for these needs to be addressed before other rehabilitation work.

How are the actions listed above related to the extent of lead poisoning and hazards?

The 2018-2022 ACS estimates that 75% of homeowner housing and 62% of renter housing in the City were built before 1980. Homes built before 1978 pose a high risk of lead based paint hazards. Low-income households with young children are at high risk of lead-based paint hazards and many reside in these older units.

According to the Centers for Disease Control and Prevention, children under the age of 6 are at greatest risk for health problems caused by lead exposure. Exposure to lead can seriously harm a child's health and cause well-documented health effects, including damage to the brain and nervous system, slowed growth and development, learning and behavior problems, and hearing and speech problems.

This City has been able to reduce the risk of child blood-lead poisoning in low-moderate income households and improve the housing stock of single-family homes in low/mod neighborhoods. Neighborhood Services has been able to utilize CDBG to support Lead-Safe Spartanburg through match contributions of staff time and additional repair and rehabilitation funding for projects. To continue this

progress, the City plans to apply for a new round of HUD lead-based paint hazard control and Healthy Homes funding during the next application period. Because housing in Spartanburg is very old, the risk of lead based paint hazards will continue to remain high.

How are the actions listed above integrated into housing policies and procedures?

All housing units assisted with the City's housing rehabilitation programs built before 1978 receive lead-paint based hazard inspections and individuals and families are provided information on health and safety hazards in the home. Homes that are found to have lead hazards will be referred to the Lead-Safe Spartanburg program.

Through the Lead-Safe Spartanburg program, the City will remove Lead-Based Paint Hazards and reduce other health hazards in the home for families with children under the age of 6 and safely improve the housing stock of pre-1978 homes in the City of Spartanburg. Certain criteria and qualifications apply, which are listed below:

- The home must be located within the City of Spartanburg limits.
- A child under the age of 6 must reside or regularly spend time in the home (over 60 hours per year), or a pregnant woman must reside in the home.
- Household income must be less than 80% of the Area Median Income (AMI).
- The home must be built prior to 1978.
- All property tax payments and homeowner's insurance must be current.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The activities in this plan will work directly to reduce the number of poverty-level families and alleviate homelessness in the City of Spartanburg. Public facility and infrastructure improvement activities are aimed at improving the quality of life for residents in low/mod areas. These activities will focus on increasing access to neighborhood facilities and improving infrastructure such as streets and sidewalks in low-income neighborhoods.

Public service programs will help to provide vital services for LMI households and the City's most vulnerable residents, which include persons with a disability, the elderly and those at-risk of homelessness. These programs are designed to promote economic sustainability and end housing instability.

Affordable housing development and preservation programs will help with increasing affordable housing opportunities, and rehabilitate existing affordable housing units in order to prevent living conditions that can lead to homelessness. Reducing housing instability will improve the economic health of families and help them become financially self-sufficient. While there has been much progress, the City is limited in its efforts to reduce the number of households living in poverty due to limited resources and capacity of the various agencies to address this problem.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

In the 2024-2028 Consolidated Plan period, the City of Spartanburg will focus on achieving goals that are designed to reduce the number of persons in poverty. The City will also collaborate with other local nonprofit organizations that operate programs that similarly have a goal of reducing the poverty level in the City. Actions that the City may implement include:

- Public improvements in neighborhoods that are low/mod and may have a high poverty rate;
- Public service programs that provide services to low income households and special need groups that encourage housing stability and improve the quality of life of residents;
- New housing development that will give families living in poverty affordable housing options;
- Housing rehab activities that will maintain the condition of their homes which will prevent the risk of homelessness:
- Lead-Safe Spartanburg program that will address lead based paint hazards in homes built before 1978, which will improve the health of families that are likely living in poverty;
- Provide direct rental assistance for individuals and families at risk of homelessness;
- Slum and blight removal through demolition to improve neighborhood appeal and reduce health and safety concerns in LMI neighborhoods.

SP-80 Monitoring – 91.230

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

The City of Spartanburg's Neighborhood Services Department is responsible for monitoring all activities undertaken within the CDBG and HOME program. The City's monitoring is an ongoing process involving continuous subrecipient communication and evaluation. This process involves frequent telephone contacts, written communications, analysis of reports, and periodic meetings. Program monitoring has the objectives of improving the subrecipient's basic management systems and overall management capacity to implement effective programs, verification of subrecipient compliance with federal regulations and the elimination of inefficient, ineffective and/or improper use of federal funds. All activities are carried out under a binding contract and records are maintained of all activities.

When conducting monitoring, the following steps are followed:

- a) Meet with appropriate officials and explain the purpose of monitoring.
- b) Review appropriate materials generated by the subrecipient which provides more detailed information on project descriptions and status.
- c) Review pertinent Subrecipient files.
- d) Interview members of the subrecipient's staff to discuss performance.
- e) Visit project sites.
- f) Hold a closing conference to present preliminary conclusions.

The focus of program monitoring is on key indicators such as completion of project designs or plans and specifications, letting of contracts, obligations of funds, and expenditure of funds. Where activities have experienced delays, assessment should be made of the reason for the delay, the extent to which the factors causing the delay are beyond the control of the subrecipient or the extent to which the original schedule was unrealistic, whether the cause is unique to the project or systemic, and what corrective action, if any, the subrecipient is undertaking. Accurate records of any on-site monitoring visit will include the completion of the City's monitoring checklist and summary report, of which both shall be added to the subrecipients' file.

Specific to CDBG public Services, reporting occurs on a quarterly basis to identify goals and objectives achieved and to ensure they are in compliance with program regulations. Beneficiary forms are collected and maintained in the Neighborhood Services Department. The Community Services Specialist scheduled at least one monitoring session with each subrecipient during the fiscal year to determine if the organization is implementing and administering CDBG funded activities according to applicable Federal requirements and goal objectives outlined.

The comprehensive planning requirements include the community planning and development process of

the 5-Year ConPlan, Annual Action Plans, and CAPERs as per 24 CFR 91 Subpart A, C & F. Citizen participation is a vital part of the Consolidated Plan process, and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide City staff to gather community input which is essential for identifying the priority housing and community development needs in the City. The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an Annual Action Plan which identifies the activities that will address and further the goals of the 5-year plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG and HOME funding annually. At the end of each program year, the City will report on the performance of the program through the CAPER report. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

It is the policy of the City to provide minorities and women equal opportunity for participating in all aspects of the City's contracting and procurement programs, including but not limited to, construction projects, supplies and materials purchase, and professional and personal service contracts. The City's goals will be set in accordance with 49 CFR 26.45. Full details are posted in the Procurement & Property Management Policies and Procedures Manual on the City website at:

https://www.cityofspartanburg.org/DocumentCenter/View/477/Procurement-and-Property-Policy-PDF?bidId=

Annual Action Plan

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

Introduction

The City of Spartanburg is an entitlement community, and anticipates it will receive the following community planning and development funds from the U.S. Department of Housing and Urban Development (HUD) in PY 2024.

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)

These grant programs will support community development programs, affordable housing development and preservation, and address homelessness. PY 2024 is the first year of the 2024-2028 Consolidated Plan. The City anticipates it will receive similar amounts each year for the remainder of the Consolidated Plan period.

Anticipated Resources

Program	Source of	Uses of Funds	Ex	pected Amoun	t Available Year	1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						PY 2024 is the first year of
	federal	Admin and Planning						the ConPlan, and the
		Economic Development						expected amount available
		Housing						for the remainder of the
		Public Improvements						plan is 4x times the annual
		Public Services	642,598	0	0	642,598	2,570,392	allocation.
HOME	public -	Acquisition						PY 2024 is the first year of
	federal	Homebuyer assistance						the ConPlan, and the
		Homeowner rehab						expected amount available
		Multifamily rental new						for the remainder of the
		construction						plan is 4x times the annual
		Multifamily rental rehab						allocation.
		New construction for						
		ownership						
		TBRA	200,630	0	0	200,630	802,520	

Table 54 - Expected Resources – Priority Table

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

In order to maximize the effectiveness of its formula grant funding, the City of Spartanburg has formed working partnerships with local nonprofit organizations, private lending institutions, and various agencies that receive funding from other private, state, and local sources. The City encourages the participation of private enterprise and nonprofit entities in providing affordable housing and housing assistance. This is accomplished by leveraging funds made available through the CDBG and HOME programs. There is no matching requirement for the CDBG program. For HOME, HUD has historically determined that the City of Spartanburg meets the criteria of fiscal distress. The HOME match reduction is reviewed annually. In FY 2023, the City received a 100% reduction of the 25% match requirement. In previous years the City received a 50% reduction. Currently the City utilizes excess HOME match from prior fiscal years to meet the required match amount. A recent example was an appraised/real land property for a HOME activity which resulted in one affordable rental unit. This match contributed \$15,000 and increased the excess match to be carried over into the new FY to \$1,333,561.

American Rescue Plan Act (ARPA) funds will be leveraged to maximize the impact of the City's annual allocation of HOME and CDBG funding as well as the HOME-ARP funding. \$2,500,0000 in ARPA funding has been set-aside for affordable housing programs. ARPA funds will be used for development of housing for homeownership and rental housing, and owner-occupied housing repairs.

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

Several public facilities offer services to enhance the quality of life for all residents of Spartanburg. The Dr. T.K. Gregg Center is a newly constructed public recreation center. The building and the services provided there are vital to the current redevelopment plans of the Northside community. The C.C. Woodson Community Center and James D. Thornton Activity Center both provide educational and recreational programming for youth, adults, and seniors. These centers can be reserved for private events and often serve as locations for community meetings, educational workshops, and events to share City plans and activities.

The City has acquired several vacant lots in residential neighborhoods in its previous and ongoing efforts to reduce slum and blight. The City works with non-profit and private housing developers to create plans for affordable housing and other beneficial developments in those neighborhoods.

Discussion

The City of Spartanburg will continue to seek additional resources to address priority needs in the community.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
Order		Year	Year			Addressed		
1	2A Provide for	2024	2028	Affordable	Low/Mod Block Group Tracts	Preserve &	CDBG:	Homeowner Housing
	Owner			Housing	Highland	Develop	\$360,598	Rehabilitated: 30 Household
	Occupied				Northside	Affordable		Housing Unit
	Housing Rehab				West Main	Housing		
					Hospital/Wofford			
2	2B Increase	2024	2028	Affordable	Low/Mod Block Group Tracts	Preserve &	HOME:	Homeowner Housing Added: 1
	Homeowner			Housing	Highland	Develop	\$90,315	Household Housing Unit
	Hsng				Northside	Affordable		
	Opportunities				West Main	Housing		
					Hospital/Wofford			
3	2C Increase	2024	2028	Affordable	Low/Mod Block Group Tracts	Preserve &	HOME:	Rental units constructed: 3
	Renter Housing			Housing	Highland	Develop	\$90,315	Household Housing Unit
	Opportunities				Northside	Affordable		
					West Main	Housing		
					Hospital/Wofford			
4	2D Reduce Slum	2024	2028	Affordable	Low/Mod Block Group Tracts	Preserve &	CDBG:	Buildings Demolished: 6
	& Blight in			Housing	Highland	Develop	\$64,000	Buildings
	Residential				Northside	Affordable		
	Areas				West Main	Housing		
					Hospital/Wofford			

Sort	Goal Name	Start	End	Category	Geographic Area	Needs	Funding	Goal Outcome Indicator
Order		Year	Year			Addressed		
5	3A Provide	2024	2028	Non-Housing	Low/Mod Block Group Tracts	Public	CDBG:	Public service activities other
	Services for LMI			Community	Highland	Services &	\$90,000	than Low/Moderate Income
	& Special Needs			Development	Northside	Quality of Life		Housing Benefit: 100 Persons
					West Main	Improvements		Assisted
					Hospital/Wofford			
6	4A Effective	2024	2028	Non-Housing	Low/Mod Block Group Tracts	Effective	CDBG:	Other: 1
	Program			Community	Highland	Program	\$128,000	
	Management			Development	Northside	Management	HOME:	
					West Main		\$20,000	
					Hospital/Wofford			

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	2A Provide for Owner Occupied Housing Rehab
	Goal Description	The City will partner with housing service providers and nonprofit organizations to rehabilitate owner-occupied housing, including emergency repairs and minor structural rehab. Housing rehab activities will target LMI households below 60% AMI.
2	Goal Name	2B Increase Homeowner Housing Opportunities
	Goal Description	The City will provide for new homeowner housing opportunities such as site improvements, the construction of housing and/or direct financial assistance. New homeowner housing opportunities will target LMI households between 60% and 80% AMI.
3	Goal Name	2C Increase Renter Housing Opportunities
	Goal Description	The City will partner with housing service providers and nonprofit organizations to develop affordable rental housing units through sit improvements, new construction, and rehabilitation . Rental housing opportunities will target LMI households.
4	Goal Name	2D Reduce Slum & Blight in Residential Areas
	Goal Description	The City will demolish buildings condemned due to code enforcement regulations in an effort to reduce slum and blight in low-moderate income areas.
5	Goal Name	3A Provide Services for LMI & Special Needs
	Goal Description	The City will fund non-profit organizations providing public services to LMI households and special need groups such as persons with a disability, the elderly and those at-risk of homeless.
6	Goal Name	4A Effective Program Management
	Goal Description	The City will provide for effective program management of the CDBG and HOME program. Activities will include the planning of programs, compliance, monitoring and reporting.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Over the next five years of the 2024-2028 Consolidated Plan, the City estimates that it will assist low-to moderate-income households with affordable housing activities:

Homeowner Housing Rehabilitated: 30 Household Housing Unit

Homeowner Housing Added: 1 Household Housing Unit Rental units constructed: 3 Household Housing Unit

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Spartanburg City Council has approved the following projects for the PY 2024 AAP.

Projects

#	Project Name
1	CDBG Administration
2	CDBG Public Services
3	CDBG Housing Programs
4	CDBG Demolition
6	HOME Program Administration
7	HOME Affordable Housing Opportunities
8	HOME CHDO Housing Development (15%)

Table 56 – Project Information

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

The City of Spartanburg's funded projects will address the housing and community development needs as identified in the ConPlan's five-year Strategic Plan. The following needs are categorized by priority.

Public services that improve the quality of life for LMI residents are a high priority. This need exceeds the amount of funds available, however there is a 15% grant cap allocation for public services.

The preservation of existing affordable housing units, as well as the development of additional affordable housing for both rental and homeownership opportunities, remains one of the highest priorities in the City. These needs are addressed by CDBG and HOME funds as eligible under each grant guideline. Activities include direct financial assistance, rental housing construction, existing homeowner housing rehab, and other homeownership opportunities.

Slum and blight removal is a high priority as identified by City staff and residents. The removal of blight will help to start revitalization in key areas of the City of Spartanburg. These activities will focus on the demolition of dilapidated buildings and unsafe structures.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration
	Target Area	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford
	Goals Supported	2A Provide for Owner Occupied Housing Rehab 2D Reduce Slum & Blight in Residential Areas 3A Provide Services for LMI & Special Needs 4A Effective Program Management
	Needs Addressed	Preserve & Develop Affordable Housing Public Services & Quality of Life Improvements Effective Program Management
	Funding	CDBG: \$128,000
	Description	Administration of the City of Spartanburg's 2024 CDBG Program Year
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A. CDBG Administrative Activities will support and facilitate all activities that benefit low-moderate income persons citywide.
	Location Description	Activities will be administered through the City of Spartanburg's Neighborhood Services Department.
	Planned Activities	Neighborhood Services Administration
2	Project Name	CDBG Public Services
	Target Area	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford
	Goals Supported	3A Provide Services for LMI & Special Needs
	Needs Addressed	Public Services & Quality of Life Improvements
	Funding	CDBG: \$90,000

	Description	Provide vital public services to improve the quality of life for LMI residents and programs that eliminate housing instability.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
	Location Description	Citywide, eligible.
	Planned Activities	Planned activities include housing related services, (05J, 05X, 05U).
3	Project Name	CDBG Housing Programs
	Target Area	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford
	Goals Supported	2A Provide for Owner Occupied Housing Rehab
	Needs Addressed	Preserve and Develop Affordable Housing
	Funding	CDBG: \$360,598
	Description	Housing Rehabilitation
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 30 Household Housing Unit
	Location Description	Citywide, eligible.
	Planned Activities	Emergency repairs and owner-occupied rehabilitation of single-family residential units targeted to households at or below 60% AMI.
		Rehab Admin and Code Admin, 15 households (14H): \$165,000
		Housing Rehab, 15 households (14A): \$195,598
4	Project Name	CDBG Demolition
	Target Area	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford

	Goals Supported	2D Reduce Slum & Blight in Residential Areas
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	CDBG: \$64,000
	Description	Removal of Slum and blight through demolition to improve neighborhood appeal and reduce health and safety concerns in LMI neighborhoods
5	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Buildings Demolished: 6 Buildings
	Location Description	Scattered site demolition in low-moderate income neighborhoods, 6 properties (04): \$64,000
	Planned Activities	Code enforcement demolition of blighted residential structures
	Project Name	HOME Program Administration
	Target Area	Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford
	Goals Supported	2B Increase Homeowner Hsng Opportunities 2C Increase Renter Housing Opportunities
	Needs Addressed	Preserve and Develop Affordable Housing
	Funding	HOME: \$20,000
	Description	Administration of PY 2024 HOME Projects
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A. Administrative support to HOME activities in PY 2024.
	Location Description	Citywide, eligible.
	Planned Activities	Administration of HOME Activities
	Project Name	HOME Affordable Housing Opportunities

	1
Low/Mod Block Group Tracts Highland Northside West Main Hospital/Wofford	
2B Increase Homeowner Hsng Opportunities 2C Increase Renter Housing Opportunities	
eds Addressed Preserve & Develop Affordable Housing	
HOME: \$149,630	
HOME funds will support the development of affordable in the City of Spartanburg.	ousing
get Date 6/30/2025	
mate the number and type amilies that will benefit m the proposed activities Rental units constructed: 3 Household Housing Unit	
ation Description Citywide, eligible.	
nned Activities Development of 3 affordable housing residential housing	units.
ject Name HOME CHDO Housing Development (15%)	
get Area Low/Mod Block Group Tracts	
Highland Northside West Main Hospital/Wofford	
Northside West Main	
Northside West Main Hospital/Wofford	
Northside West Main Hospital/Wofford 2B Increase Homeowner Hsng Opportunities	
Northside West Main Hospital/Wofford 2B Increase Homeowner Hsng Opportunities Preserve & Develop Affordable Housing	
Northside West Main Hospital/Wofford 2B Increase Homeowner Hsng Opportunities eds Addressed Preserve & Develop Affordable Housing HOME: \$31,000 Reserved funding for a Community Housing Development	
Northside West Main Hospital/Wofford 2B Increase Homeowner Hsng Opportunities eds Addressed Preserve & Develop Affordable Housing HOME: \$31,000 Reserved funding for a Community Housing Development Organization (CHDO) to develop affordable housing.	
Northside West Main Hospital/Wofford 2B Increase Homeowner Hsng Opportunities eds Addressed Preserve & Develop Affordable Housing HOME: \$31,000 Reserved funding for a Community Housing Development Organization (CHDO) to develop affordable housing. get Date 6/30/2025 Homeowner Housing Added: 1 Household Housing Unit	

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

The City of Spartanburg will continue to direct the majority of CDBG and HOME assistance to the Target Areas listed in the table below. Low/Mod Block Group Tracts are located Citywide and have a majority of households that are LMI. The Highland, Northside, West Main, and Hospital/Wofford target areas are the City's Opportunity Zones. More details on these target areas are provided below.

Low-Income Families

Households earning less than 80% of the area median income (AMI) are considered low-income. To be considered a tract with a concentration of low-income households, the tract's median household income is less than 80% of the AMI.

The City's area median income is \$49,140, and 80% of the AMI is \$39,312. Based on these criteria, there is a concentration of low-income tracts on the western border of the City (206.011, 206.021, 206.032, 206.033), one near the center of downtown (204.001), and a concentration on the east side of the City (211.004, 212.002, 212.003, 213.011, 213.012, 213.021, 213.022, 213.031). For a map of the concentration of low-income households, see the MA-50 of the 2024-2028 ConPlan.

Race/Ethnicity

For the purposes of this analysis, a concentration is any census tract where the racial or ethnic minority group makes up 10% more than the Citywide average. More information about race/ethnicity concentrations in the City of Spartanburg can be found in the MA-50. Data was taken from the most recent 2018-2022 ACS.

For Black or African-American households, the Citywide rate is 44.7% and a tract with a concentration would be 54.7% or more. Tracts with a concentration of Black households are found primarily in the center of the City and northeast of Spartanburg Downtown Memorial Airport.

For Hispanic households, the Citywide rate was 5.1% and a tract with a concentration would be 15.1% or more. There were no tracts within the City limits that had a concentration of Hispanic households; however, just outside and northwest of the City is a concentration in several tracts.

There were no other minority groups (racial and ethnic) in the City with a concentration of minority race groups living in a census tract. A summary of tracts with low-income households and minority

concentration is located in the MA-50 of the 2024-2028 Consolidated Plan.

Geographic Distribution

Target Area	Percentage of Funds
Low/Mod Block Group Tracts	80
Highland	5
Northside	5
West Main	5
Hospital/Wofford	5

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has four (4) Opportunity Zones: Highland, Northside, West Main, and Hospital/Wofford. These target areas are described in more detail in the SP-10 of the Five-Year Strategic Plan. Opportunity Zones are designed to encourage long-term private investments in low-income communities, providing a federal tax incentive for taxpayers who reinvest unrealized capital gains into Opportunity Funds, which are specialized vehicles dedicated to investing in specially designated low-income areas. These neighborhoods are prioritized as they are strained by issues such as high unemployment, low-income levels, dilapidated housing & commercial structures, as well as a general lack of community services.

Other than the four Opportunity Zones, the City of Spartanburg does not allocate funding based solely on geographic requirements. However, when planned activities are intended to serve individuals or households directly, they must meet income qualifications, as well as live within the City limits, in order to receive assistance from the program. In these instances, City staff and/or one of its partner agencies will complete an in-take and eligibility status review of the applicant before the activity is initiated.

When the City has identified public facilities and infrastructure improvement activities, the activities will serve a community or neighborhood. These activities are said to have an "area-wide" benefit. Per HUD requirements, these areas must be within an eligible census block group tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are at least 51% low- to moderate-income.

To determine census block group tracts, the City will be utilizing HUD's CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible tracts within the jurisdiction. The identified census block group tracts that are considered low-moderate income can be found on the HUD Exchange website at: https://www.hudexchange.info/programs/acs-low-mod-summary-data/

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Spartanburg will support the development and preservation of affordable housing by providing funding for the following activities:

- CDBG: Owner-Occupied rehabilitation
- HOME: Community Housing Development Organizations (CHDO) Eligible Activities
- HOME: Non-CHDO Housing Development Activities

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	34
Special-Needs	0
Total	34

Table 58 - One-Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	30
Acquisition of Existing Units	0
Total	34

Table 59 – One-Year Goals for Affordable Housing by Support Type

Discussion

CDBG:

Homeowner Housing Rehabilitated: 30 Household Housing Unit

HOME:

Homeowner Housing Added (CHDO): 1 Household Housing Unit

Rental units constructed: 3 Household Housing Unit

AP-60 Public Housing – 91.220(h)

Introduction

Spartanburg Housing is the local public housing authority serving in the City of Spartanburg. The mission of Spartanburg Housing is similar to that of Neighborhood Services: To promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Spartanburg Housing has recently rebranded from the former Spartanburg Housing Authority (SHA) in order to reflect its evolution while recommitting to its focus on housing. Spartanburg Housing currently serves over 3,000 families under its various housing programs. The housing authority manages over 400 Public Housing units in communities throughout the City of Spartanburg. Public housing units come in all sizes and types including duplexes, garden-style apartments and townhomes in various bedroom sizes, and high-rise apartments for elderly residents. The housing authority also has accessible units for individuals with disabilities.

Spartanburg Housing administers the Housing Choice Voucher (HCV) program, also known as Section 8, which provides subsidies for privately owned housing for eligible applicants in their service area. The PHA currently manages 2,650 vouchers. Tenants using these vouchers are required to pay 30% of their income toward the rent and the housing authority subsidizes the difference up to fair market rent established by HUD on an annual basis. As reported in Spartanburg Housing's most recent 2024 PHA Plan, there were 5,604 families on the HCV waitlist and 5,482 families on the traditional public housing waitlist.

Actions planned during the next year to address the need to public housing

As highlighted throughout this plan, affordable housing is a priority need. The City will continue its efforts to increase the quality and quantity of units available to serve the populations currently utilizing public housing. The City will also continue to foster relationships with property owners and tenants using Housing Choice Vouchers to provide repairs and rehabilitation options to improve the housing stock and unit availability.

The continued partnership with Spartanburg Housing will provide guidance for other opportunities and gaps in services and needs for public housing. Spartanburg Housing will review opportunities to acquire or build units or developments and continue to offer one for one replacement of units repositioned due to Rental Assistance Demonstration (RAD) program. Ongoing plans to expand HCV voucher use by incentivizing additional landlords to participate in the Housing Choice Voucher Program will continue. Spartanburg Housing will maintain a high level of accountability while implementing timely tracking, scheduling, and follow-up for rent collection efforts, vacancy turnover management, and new leases. These actions will help with improving housing management, monitoring, and internal reporting tools. Finally, Spartanburg Housing will maintain a minimum of 98% occupancy rate and a vacant unit turnover time at or below 20 days.

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OMB Control No: 2506-0117 (exp. 09/30/2021)

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

The Neighborhood Services Department often collaborates with Spartanburg Housing and other agencies to provide opportunities for homebuyer education seminars and workshops. The City also provides CDBG funding to non-profit organizations that provide financial counseling and ongoing case management to citizens to gain the financial stability needed to pursue homeownership. These organizations also connect residents with down payment assistance programs offered through the City and partner agencies such as the Northside Development Group.

Spartanburg Housing's Family Self-Sufficiency Program (FSS) helps low-income families attain a better standard of living while promoting self-sufficiency. Participants sign a five-year contract that outlines specific goals to be accomplished during the time period, including first-time employment, higher education, establishment of a self-sustaining atmosphere, and the opportunity to establish and build an interest-bearing escrow account. The account becomes available once the family has completed the FSS program and has been free of all public aid for 12 months. Spartanburg Housing has also relaunched the Housing Choice Voucher Homeownership program in 2021. The City of Spartanburg works toward ensuring there is a decent and affordable housing stock for participants to pursue.

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

N/A. Spartanburg Housing (SC003) is a standard PHA, and not designated as troubled.

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

The City of Spartanburg is a member of the Spartanburg, Union, and Chesnee County (CUS) Chapter of the Upstate Continuum of Care (CoC), which aims to prevent, reduce, and end homelessness through the coordination of agencies in our communities. United Housing Connections (UHC) coordinates the CoC's efforts throughout the 13 counties in the Upstate and is the leading provider of services, as well as the collaborative applicant for the HUD CoC Program Grants. UHC is also the Homeless Management Information System (HMIS) administrator for the region.

Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including:

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

The City of Spartanburg has created the Homeless Engagement and Response Team (H.E.A.R.T.) that consists of staff and volunteers that focus on homeless outreach, particularly in known areas throughout the City where homeless persons visit frequently. The goal is to assess their needs and connect these persons to the ongoing services and resources available. This outreach provides insight into gaps in services provided and guides the homeless strategy for the jurisdiction. The City of Spartanburg has also staffed a dedicated Homeless Outreach Coordinator that serves as the liaison to the CUS chapter and encourages engagement from local service providers to those experiencing homelessness. This staff member also coordinates with the ongoing Homeless Court started in the City and refers potential candidates to go through this unique process. Candidates for homeless court are provided resources and held accountable for goals to achieve self-sustainability in lieu of being charged with minor offenses. At court sessions, which are usually held at a location that provides services to homeless persons, other agencies are often in attendance to provide additional information and resources for the candidates and others who may need assistance.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Spartanburg actively seeks opportunities and partnerships to address the community's need for additional emergency shelter and transitional housing. The following service providers help address this need in the City:

United Housing Connections, the local Continuum of Care (CoC) offers transitional housing for families in Spartanburg. Homeless persons in emergency and transitional housing in the City have access to all programs and services offered through the CoC.

Project R.E.S.T. has been a consistent partner with the City. This facility provides shelter for victims of rape and/or domestic violence and their dependents, in addition to providing counseling, supportive

services, and case management in order to transition into stable housing.

Angel's Charge Ministry, with the help of the City, is developing two transitional housing units for women coming out of incarceration. Each unit will be able to house up to four women at a time. The establishment of more transitional housing will increase the organization's capacity to reach more families and help them move along the path to sustainability rather than staying in a shelter or on the streets.

GoForth Recovery provides ongoing transitional housing and case management for single men recovering from addiction. Their facility houses up to 16 men and their programs provide for transportation to appointments and employment to facilitate long-term independence.

Warriors once Again provides transitional housing and supportive services to single veteran men in the City.

When funding permits, the City will continue to dedicate funding to the operations and expansion of existing emergency shelters throughout the community. Whenever possible, the City provides CDBG public service funding to organizations in the CoC to support their ongoing initiatives, programs, and operations.

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 Litter HEROS program, created through H.E.A.R.T., connects homeless individuals to job and life skills training while they earn an income. Participants receive ongoing case management to secure housing and permanent employment during and after the program's completion.

The City received a one-time allocation of HOME-ARP funding in 2021 and anticipates increasing funding available for supportive services, access to affordable housing, and coordination amongst agencies to decrease the length of time that individuals and families experience homelessness. The allocation plan that was required to utilize the funds highlighted the unmet housing needs of qualifying homeless populations and the resources needed. Upon implementation of this plan, along with the development of the overall Homelessness Strategy, the City plans to increase the quantity and variety of housing options, which is a large barrier for those receiving supporting services and attempting to gain stable housing.

Representatives from various departments in the City of Spartanburg (including Neighborhood Services, Code Enforcement, and the City Manager's office) are active participants in the Homeless Taskforce. Spearheaded by the United Way of the Piedmont, this committee includes other local agencies, the county government, legal advisors, and law enforcement who serve as a network of community leaders that

come together to assess the homelessness situation in the community to brainstorm and implement various tactics to be used strategically throughout the city and county. This diverse network provides greater insight into the needs and experiences of homeless persons and allows for an increased flow of information and resources to guide further actions and initiatives.

The City of Spartanburg has created the Homeless Engagement and Response Team (H.E.A.R.T.) that consists of staff and volunteers that focus on homeless outreach, particularly unsheltered persons in known sites in the City that homeless persons visit frequently. The goal is to assess their needs and connect these persons to the ongoing services and resources available. This outreach provides insight into gaps in services provided and guides the homeless strategy for the jurisdiction.

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 Spartanburg and CoC's partnership, along with ongoing communication with public institutions and systems of care, guides the strategies used to prevent low-income individuals and families from becoming homeless. Some of these organizations include but are not limited to, Access Health, Spartanburg Mental Health, McKinney-Vento liaisons in the public schools, the SC Department of Social Services, and local law enforcement.

Through these partnerships, the CoC can identify persons and families at risk of homelessness and connect them to available resources. These families may receive emergency assistance with rental and/or utility payments, referrals to income-based rental options, and applications for public benefits for which they may be eligible.

Below are a few additional assistance programs supported by the City for low-income families to avoid becoming homeless:

- The City funds the United Way's Community Resource Coordinators. These caseworkers provide
 guidance on setting goals and priorities for their families and themselves to obtain financial
 sustainability and housing stability. The City also promotes the United Way of the Piedmont 211
 hotline, a central resource for all community needs. Residents can find resources for rent and
 utility assistance, food, social services, etc.
- The City supports the expansion of services and developments at the Opportunity Day Center to connect individuals to resources.
- The City is working with Angel's Charge Ministry to develop transitional housing for women

- recently released from correction facilities.
- H.O.P.E Ministries receives funding from the CDBG Public Services allocation. This organization
 operates an all-male transitional house, focusing on men recently discharged from corrections
 programs and institutions. It connects them with a job-training program so that they can work
 while living in the house.
- The Bethlehem Center receives funding from the CDBG Public Services allocation. It serves as a
 resource hub for the Highland Community and all youth attending after-school and summer
 programs. In addition to youth development, the Bethlehem Center coordinates food
 supplementation and connects youth to social services and resources as needed.
- SC Legal Services receives CDBG Public Service allocations and can help with prevention of homelessness when legal work is needed to prevent eviction or foreclosure

The City of Spartanburg also provides help for those who are extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care. The City's Homeless Outreach Coordinator coordinates with the ongoing Homeless Court started in the City and refers potential candidates to go through this unique process. Candidates for homeless court are provided resources and held accountable for goals to achieve self-sustainability in lieu of being charged with minor offenses. At court sessions, which are usually held at a location that provides services to homeless persons, other agencies are often in attendance to provide additional information and resources for the candidates and others who may need assistance. These services help these individuals reintegrate into the community and avoid becoming homeless.

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

Introduction:

Although public policies are intended to positively address the needs of citizens in a jurisdiction, there are times when they may have an unforeseen negative effect on certain aspects of the community, which in this case are affordable housing and residential investment. Public policies that negatively affect affordable housing and residential investment become a barrier to creating affordable housing in the area. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

To identify these negative effects and further the purposes of the Fair Housing Act, the U.S. Department of Housing and Urban Development (HUD) made it a legal requirement that entitlement grantees affirmatively further fair housing. The primary tool communities have for identifying contributing factors that lead to negative effects on the community is the Analysis of Impediments to Fair Housing Choice (AI).

The AI reviews the community demographics, market availability, public and private policies, practices, and procedures affecting fair housing choice and affordable housing. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices based on race, color, religion, sex, disability, familial status, or national origin. The AI serves as the basis for fair housing planning, provides essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

To ensure that all residents in the City of Spartanburg are protected under state and local law and adhere to HUD regulations on fair housing as required by CPD entitlement grants, the City has taken steps to promote fair housing and educate its leadership, staff, and residents on what HUD defines as fair housing and discrimination in housing.

In 2019, the City of Spartanburg, in partnership with the County and Spartanburg Housing came together to carry out the Joint Analysis of Impediments of Fair Housing Choice, which identified six impediments to fair housing in the region along with a table listing their associated contributing factors. Contributing factors are issues leading to an impediment that is likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors were also provided, along with goals, timelines, and responsible parties.

Full details of the fair housing impediments can be viewed in the 2019 Joint AI. A list of the identified impediments is shown below:

Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices

Impediment #2: Neighborhoods Need Place-Based Community Investments

Impediment #3: Need for Continued and Expanded Fair Housing Activities

Impediment #4: Affordable Housing Planning Lacks Equity Focus

Impediment #5: Limited Housing Options for People with Disabilities

Impediment #6: Weak Job-Transit Connections

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

The following actions will be made or have been undertaken to address affordable housing barriers and form partnerships with other local government, private, and non-profit organizations to implement these plans.

- Collaborate with Spartanburg Housing and the County to implement an ongoing landlord recruitment campaign for the Housing Choice Voucher program.
- Develop opportunities for property owner and tenant education through events, seminars, and the Fair Housing Hotline, which is managed by Neighborhood Services Staff.
- Support and accommodate proposed LIHTC developments in the jurisdiction, providing letters of support and gap financing where possible and appropriate.
- Give new affordable housing development priority consideration when it will be located in an area that increases access to new types of opportunities.
- Fund agencies that provide homeownership preparation and financial counseling for first-time homebuyers.
- Develop partnerships with credit counseling agencies to reach minority communities and build a pipeline of potential homebuyers.
- Meet with lenders and/or appraisers to inform them of goals for furthering fair housing and discuss lending barriers related to homeownership and community reinvestment in low-income neighborhoods.
- Monitor and provide financial support for the efforts of existing community-based organizations
 in offering fair housing enforcement and education related to the rights of people with disabilities.
- Review and comment on the annual PHA plan to ensure it is furthering affordable housing opportunities in high-opportunity areas.
- Develop alternate programs that may provide direct transportation linkages between housing and employment centers and potential funding sources.
- Coordinate within Target Areas to facilitate place-based community improvements.
- The City recently completed an update to its Comprehensive Plan, "Plan Spartanburg" and has committed to an equity-focused plan that addresses current barriers.

Equity Plan

As noticed by HUD on February 9, 2023, entitlement communities will begin to develop Equity Plans, which will provide a fair housing analysis, goals and strategy, and community engagement. The Equity Plan will answer questions on demographics, segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAP), access to community assets, access to affordable housing opportunities, access to homeownership and economic opportunity, any discrimination or violations of civil rights, and local/state policies and practices that impact fair housing in the City of Spartanburg. The Equity Plan will help guide the goals of the five-year plan and provide strategies that the City will utilize to affirmatively further fair housing in Spartanburg.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Spartanburg is committed to improving the lives of its citizens, particularly low- to moderate-income households and the special needs population, through affordable housing, improvements to public infrastructure and facilities, public services, and community development programs. This section describes other actions the City will take to further the goals in the plan.

Actions planned to address obstacles to meeting underserved needs

The City of Spartanburg will strategically allocate funding to public service organizations in the community that have a demonstrated commitment to addressing underserved needs in the community. These partners and stakeholders are a vital asset to the City and its residents when it comes to providing services to those with typically underserved needs. The City supports these public service organizations with direct funding as well as access to community facilities and technical support from the Neighborhood Services Staff. Services provided include:

- Youth development programs
- Homelessness prevention and supportive services
- Financial case management
- Rape and domestic violence emergency shelter and counseling services
- Free legal aid
- Job training programs

The City will continue to seek partnerships and opportunities to address ongoing needs.

Actions planned to foster and maintain affordable housing

The City will support the development and preservation of affordable housing by providing funding for owner-occupied housing rehabilitation as well as eligible acquisition and rehabilitation activities funded with CDBG and/or HOME funding. The City will also foster partnerships and seek opportunities for additional funding and resources for future development of affordable housing. See the AP-35 projects for more details on affordable housing activities funded by the City's CDBG and HOME programs.

Actions planned to reduce lead-based paint hazards

The City of Spartanburg is currently administering the Lead Safe Spartanburg program funded by the FY2019 Lead-Based Paint Hazard Reduction Grant through the Office of Healthy Homes and Lead Hazard Control. Through this program, income-eligible households with a child under the age of six or a pregnant female living in a home built before 1978 can submit an application for a free Healthy Homes and Lead Inspection/Risk Assessment at their home to identify any hazards and develop a work plan to mitigate such hazards using proper safety measures and protocols. During the PY 2024, the City plans to complete

12 lead hazard control and reduction projects for eligible households with leveraged funding from CDBG. This will reduce the risk of child blood lead poisoning in low-moderate income households and improve the housing stock of single-family homes in low-moderate income neighborhoods. Neighborhood Services utilizes CDBG to support Lead-Safe Spartanburg through matching contributions of staff time and additional repair and rehabilitation funding for projects.

The South Carolina Department of Health and Environmental Control (DHEC) investigates childhood lead poisoning in the City. DHEC advised and has ongoing communication with staff and partners working on the Lead-Safe Spartanburg Program.

The City's Building Department also assists DHEC during its construction inspection process. All housing units undergoing emergency repairs or rehabilitation through the CDBG or HOME program that were built prior to 1978 will have a lead inspection/risk assessment before any physical work begins on the unit and will practice Lead Safe practices as needed. If eligible, they can be referred to the City's Lead-Based Paint Hazard Reduction Program for these needs to be addressed before other rehabilitation work.

Actions planned to reduce the number of poverty-level families

The activities funded in the PY 2024 AAP will directly address the priority needs in the City of Spartanburg and all work together for a common goal of reducing the number of poverty-level families in the community.

Affordable housing projects and programs are designed to increase the quantity and quality of affordable housing throughout the City. Public infrastructure improvements will increase and improve the quality of life of citizens and will invite investments into areas where there are unmet needs. Public services and Economic Development by City-supported nonprofits and agencies will work to address poverty by supporting individuals and families along the path to financial stability. The City will continue to help build capacity within public service organizations to improve and increase outreach, education, and processes that will result in this desired outcome.

Actions planned to develop institutional structure

The Neighborhood Services Department strives for Division wellness through the following implementation strategies:

- 1. Improving and providing staff training and technical assistance as needed
- 2. Developing file and document-sharing opportunities
- 3. Review program manuals annually for updates.

Cross-departmental coordination between Neighborhood Services, Community Relations, Finance, and

Property Maintenance ensures proper implementation and reporting of activities.

In accordance with Section 91.220-01.320 of the Consolidated Plan Regulations, the City of Spartanburg has a monitoring process to evaluate its progress in meeting its five-year goals. The internal performance evaluation is regularly reported to the City Manager's office and City Council.

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

The City of Spartanburg will continue to coordinate efforts with the County and Spartanburg Housing to improve its citizens' lives. The City will continue to use the contributing factors and recommended activities from the Joint 2019 Analysis of Impediments to Fair Housing Choice with the County and PHA as a guide to further coordination between public and private housing and social service agencies.

The City will also coordinate with United Housing Connections, the local CoC, to address the needs of the homeless in the City. The City continues to support the Community Resource Coordinators through the United Way to provide case management and referral services to households in public and private housing in the City.

The City and these partners lead these collaborative efforts through ongoing structured processes and through the willingness to explore and pilot new programs and development opportunities.

Program Specific Requirements

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

Introduction:

All projects planned with CDBG and HOME funding in the City of Spartanburg will adhere to program eligibility and requirements.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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	0
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.	
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
Total Program Income:	0
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. 70.	00%

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

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

No other forms of investment beyond those identified in Section 92.205 are utilized at the time.

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

As a participating jurisdiction (PJ), the City of Spartanburg will use HOME Investment Partnership (HOME) funds for income-eligible homebuyers as a direct subsidy. There are two HOME provisions, 1) Resale and 2) Recapture, as required in section 92.254 of the HOME rule. The City of Spartanburg adopted the guidelines for the Recapture Provision only.

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:

An income-eligible person or family shall mean a person or family

The affordability period begins after all title transfer requirements have been performed, the project complies with HOME requirements, and project completion information has been entered into IDIS. The term of the affordability period for the project is based on the amount of total HOME funds assistance that the homebuyer receives to purchase the home. This assistance could be directly, in the form of down-payment assistance or a second mortgage, or indirectly, such as through the sale of the home to the buyer at less than market value. Only the direct HOME subsidy amount received by the homebuyer is subject to recapture. The City of Spartanburg shall provide income eligible homebuyers a deferred loan with an interest rate of 3% per annum, secured by an Affordability Provision.

- If the homebuyer receives less than \$15,000, the period of affordability is 5 years.
- If the homebuyer receives \$15,000 \$40,000, the period of affordability is 10 years.
- If the homebuyer receives more than \$40,000, the period of affordability is 15 years.

The recapture provision will be triggered if during the affordability period, the homebuyer no longer occupies the HOME-assisted unit as their principal residence, either voluntarily (through a sale) or involuntarily (through foreclosure), death of the borrower, or a refinance or subordination of any loan superior to the HOME loan without permission from the City. In the event of a sale of the property during the period of affordability, the City of Spartanburg will recapture 100% of the HOME assistance if there are sufficient net proceeds available. If there are no net proceeds or the net proceeds are insufficient to repay the HOME investment due, the City will recapture the net proceeds, if any.

Likewise, once the net proceeds have been used to repay the entire amount to the City of Spartanburg (HOME investment) and the homeowner's investment, any additional funds may remain with the homeowner. A mortgage and note are recorded for each homebuyer, as well as a separate written agreement, to enforce homebuyer compliance with the recapture provision. The servicer of the homebuyer loans notifies the City when there is a request for a change of address or change in type of insurance to non-owner.

- 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 will not use HOME funds to refinance existing debt on multifamily projects within the city
- The City will not use any HOME funds for tenant-based rental assistance.
- The City does not plan to use any forms of investment other than those listed in 24 CFR 92.205(b)
- 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)).

Not applicable. The City does not plan to fund TBRA activities with HOME program funds.

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)).

Not applicable. The City does not plan to fund TBRA activities with HOME program funds.

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 92.253(d)(3), an owner of rental housing assisted with HOME funds must comply with the affirmative marketing requirements established by the City of Spartanburg (PJ) pursuant to 24 CFR 92.351(a). The owner of the rental housing project must adopt and follow written tenant selection policies and criteria, which include that it may give a preference to a particular segment of the population if permitted in its written agreement with the PJ such as persons with a disability or other special needs. However, at this time, there is no limit to eligibility or preference given to any particular segment of the population with rental housing projects funded by the City's HOME program funds. HOME funds must target low- to moderate-income households. The City does not discriminate and provides equal access to all eligible households.