

Section: Needs Assessment and Gaps Analysis comment

The map titled: *Twenty-two counties do not have any shelter* (page 14), does not accurately reflect the delivery of services or shelter in the Northwest CoC's geographic area covering Avery, Ashe, Alleghany, Wilkes, Watauga, Mitchell and Yancey. Based on the title of the map, the data is incorrect, as only Watauga County operates a non DV emergency shelter and Wilkes has a limited stay10 bed shelter (2020 HIC). No other county in the Northwest region has a non DV emergency shelter. Additionally, based on the key provided adjacent to the map that lists program availability in the coverage area, services and housing supports are offered in all 7 counties in the Northwest CoC. The statement that "only five regional committees (1, 2, 6, 8, 11) covering thirty-one counties that lack shelter capacity" does not fully represent the state, as this data point only represents one CoC out of the twelve in NC.

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Section: HOME ARP Production Housing Goals (page 19)

The draft plan indicates that only 165 units of affordable rental housing may be created with HOME ARP across the state with an anticipated \$225,000 per unit development and construction cost. The draft plan further states that \$80,000 per unit in capitalized operating assistance will be utilized for the 15 year compliance period with no use of other resources/leveraging (voucher assistance, e.g.) to serve qualifying populations under the plan. The affordability compliance period should be greater than 15 years and the complete absence of any other leveraging is inconsistent with affordable housing development practices. Development of affordable housing in areas that have higher levels of voucher assistance available but lack affordable units would increase utilization of HOME ARP funds.

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