ANALYSIS OF IMPEDIMENTS AND ASSESSMENT OF FAIR HOUSING

IN FULFILLMENT OF THE REQUIREMENTS FOR AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

PIEDMONT TRIAD REGION

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SUMMARY OF FAIR HOUSING ISSUES AND CAPACITY TO ADDRESS

This section includes a summary of fair housing issues identified in the four entitlement communities and an assessment of each jurisdiction's fair housing enforcement and outreach capacity.

EXECUTIVE SUMMARY

Introduction

The preparation of this Regional Assessment of Fair Housing (AFH) serves as a component of the Piedmont Triad's efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing.

The AFH covers the entitlement communities of the City of Burlington, the City of Greensboro, the City of High Point, and the Surry HOME Consortium, all of which receive federal funds directly from the Department of Housing and Urban Development (HUD). Also covered by this AFH are the non-entitled areas within the Triad, which are eligible to apply for HUD funding from the North Carolina Small Cities Community Development Block Grant Program. The non-entitled areas include 67 municipalities and 12 counties within the Triad.[1]

The development of the AFH follows the completion of the Regional Fair Housing & Equity Assessment (FHEA) prepared for the Triad by Sills Consulting, LLC. As a recipient of a Sustainable Communities Regional Planning Grant from HUD, the Piedmont Authority for Regional Transportation (PART) oversaw the development of a regional comprehensive, long-range plan. One requirement of this process was the analysis of the impact of state, local and regional policies and practices on the availability of affordable and fair housing for residents of the Triad. The AFH picks up where the FHEA ended and provides a more in-depth analysis of communities of opportunity as well as a series of determinants of fair housing, priority fair housing issues and a series of recommended strategies that, if implemented, would eliminate the impediments to fair housing choice.

The AFH is a review of local regulations and administrative policies, procedures and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, that affect fair housing choice. Aided by an extensive community participation process, the Triad built the context for analysis by examining demographic, economic and housing market trends within the framework of access to community opportunities.

Entitlement communities receiving CDBG funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

As a result, the Triad is charged with the responsibility of conducting its CDBG and other HUD programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to units of local government and other entities that receive federal funds through any of the entitlement communities or from the State of North Carolina.

Generally, these requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice. However, the Triad has selected to prepare an AFH in response to the Proposed Rule published by HUD on July 19, 2013. The Proposed Rule sets forth a more clearly defined process and format for the evaluation of barriers to fair housing and a community's capacity to affirmatively further fair housing.

1 The City of Winston-Salem is excluded from this AFH as it prepared its own Analysis of Impediments to Fair Housing Choice separate from this report.

Communities of Opportunity

One of the most useful tools to emerge relative to determining access to community opportunity is the use of Opportunity Mapping. To describe the variation in neighborhood opportunity across metropolitan regions, the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University has developed the "Communities of Opportunity" model, a fair housing and community development framework that assigns each neighborhood a score reflecting the degree to which its residents have access to determinants of positive life outcomes, such as good schools, jobs, stable housing, transit and the absence of crime and health hazards. The Institute draws upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of this exercise in applied research are to bring opportunities to opportunity-deprived areas and to connect people to existing opportunities throughout a region.

Major Findings

The diversification of the region means new fair housing needs: The Piedmont Triad is diversifying. This diversification is occurring universally: it is not unique to the region's inner cities or low-income areas. As a result, racial segregation has continually decreased since 1970. The Hispanic population in particular is growing rapidly, bringing in a new labor force with new fair housing needs.

Clusters of racially concentrated areas of poverty occur in the region: Areas with high minority concentration and high poverty rates are clustered in the inner cities of Greensboro, High Point, Winston-Salem, Thomasville, and Lexington. The residents in these areas are predominantly renters, have longer commutes than the general population, spend a larger proportion of their income on housing, and have inferior access to opportunities such as high-performing school districts and engaged labor markets. A need for sustainable employment opportunities within, or in closer proximity to, these racially concentrated areas of poverty is needed.

Housing that is affordable to lower-income residents is not located in high-opportunity areas: This report defines affordable housing as units priced at a cost that low and moderate-income households can afford for less than 30% of their monthly income. These affordable housing options are predominantly located in low-opportunity areas. This reduces housing choice and limits access to high-opportunity areas for low-income residents, who disproportionately tend to be members of the protected classes. Public housing is also disproportionately located in low-opportunity areas, which does little to abate this issue.

Transportation is a critical component of increasing housing choice: Because of the mismatch between areas of opportunity and areas of affordability, transportation and connectivity become critical for expanding neighborhood choice. Employment centers and locations of affordable housing are often inaccessible through the public transit systems that members of the protected classes often rely upon. This spatial mismatch creates significant problems for many residents in the Piedmont Triad. There is an acute need for expanded public transportation to provide RCAP residents and members of the protected classes with access to higher opportunity areas and community assets. This can reduce transportation costs and improve the economic resilience of members of the protected classes.

Determinants of Fair Housing

This AFH also identifies the primary determinants influencing the segregation within the Piedmont Triad. The three themes most commonly derived from both the data analysis and stakeholder interviews were:

Geographic Racially Concentrated Areas of Poverty: Geographic clusters of high-poverty and high-minority areas indicate potentially limited fair housing choice for members of the protected classes. Inadequate public transportation, public housing concentrated in these areas, and a lack of incentives to develop affordable housing in other areas exacerbate these racially concentrated areas of poverty.

Disparities in Access to Community Assets: Features such as high-performing schools, strong local job markets, and adequate public transportation can greatly improve quality of life and economic vitality for members of the protected classes. However, the areas in the Piedmont Triad in which these protected classes disproportionately live have inferior access to these community assets, despite often having the greatest need.

Disproportionate Affordable Housing Need based on Protected Class Status: Members of the protected classes are more likely to be experiencing cost burden, and thus to need affordable housing. These protected classes have higher rates of poverty and have larger families. Combined with net losses in the Piedmont Triad's affordable housing inventory, the need for affordable housing options for the protected classes is acute and growing.

Priority Fair Housing Issues

There are three primary fair housing priorities impacting the Piedmont Triad region. These include the following:

1. A need for expanded public transportation to provide RCAP residents and members of the protected classes with access to higher opportunity areas and community assets
2. A need for greater affordable and accessible housing opportunities, both rental and sales units, in higher opportunity areas
3. A need for sustainable employment opportunities within, or in closer proximity to, RCAPs

Based on the data analysis detailed in the AFH, these three priorities have the potential for mitigating each of the determinants of fair housing. A step-by-step set of recommendations and guidelines on how to implement these strategies can be found in Section 4 of this report.

How the AFH will be Used

Each of the four HUD entitlement communities will incorporate their respective fair housing priorities and strategies in their Five-Year Consolidated Plans and Annual Action Plans. Non-entitlement local governments may use the opportunity mapping analysis in this AFH to design fair housing actions and strategies needed to meet state requirements for the Small Cities CDBG program.

ANALYSIS OF IMPEDIMENTS AND ASSESSMENT OF FAIR HOUSING SUMMARY: GREENSBORO

About the Regional Assessment of Fair Housing

The preparation of this Regional Assessment of Fair Housing (AFH) serves as a component of the Piedmont Triad's efforts to satisfy the requirements of the Housing and Community Development Act of 1974. This legislation applies to any community receiving Community Development Block Grant housing. The AFH covers the entitlement communities of the City of Burlington, the City of Greensboro, the City of High Point, and the Surry HOME Consortium, all of which receive federal funds directly from the Department of Housing and Urban Development (HUD). Also covered by this AFH are the non-entitled areas within the Triad, which are eligible to apply for HUD funding from the North Carolina Small Cities Community Development Block Grant Program. The non-entitled areas include 67 municipalities and 12 counties within the Triad.

The development of the AFH follows the completion of the Regional Fair Housing & Equity Assessment (FHEA) prepared for the Triad by Sills Consulting, LLC. The AFH picks up where the FHEA ended and provides a more in-depth analysis of communities of opportunity as well as a series of determinants of fair housing, priority fair housing issues and a series of recommended strategies that, if implemented, would eliminate the impediments to fair housing choice. This study may also be used to guide and prioritize elements of the Consolidated Plan and Annual Action Plan implementation process. The regional AFH provides the basis for the City of Greensboro Analysis of Impediments, which is summarized below and which is designed to meet the City's obligation under HUD rules to affirmatively further fair housing.

Top Findings in Greensboro

- ***Greensboro is growing and diversifying***
- ***Patterns of segregation and poverty persist in Greensboro***
- ***Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of Greensboro***
- ***Greensboro's supply of housing that is affordable to lower-income residents is shrinking as demand rises***
- ***There is a lack of housing that is affordable to lower-income residents in high-opportunity areas, and members of the protected classes face severe housing challenges***
- ***Greensboro faces several policy-related impediments that either directly or indirectly limit fair housing choice***
- ***Greensboro can take action to address important fair housing priorities***

Key Demographic Trends

Greensboro is growing and diversifying

Greensboro has shown steady population growth, and the city is growing significantly faster than the Piedmont Triad region in general. Greensboro grew 87.2% from 1970 to 2012, compared to 39.1% growth in Burlington, 65.1% in High Point, and 87.5% in North Carolina.

Like most of the region, Greensboro is also becoming much more diverse. While the non-White population in Greensboro increased 5% from 2000 to 2010, the Hispanic population increased 108.7%, becoming the fastest-growing demographic by far. The Black population also increased 30.9%. Minorities in Greensboro tend to have larger families: 82.3% of Hispanic families in Greensboro had three or more members, compared to 48% for Whites. Because race and ethnicity are protected classes, this increases the importance of fair housing strategies that can accommodate Greensboro's diversifying population in the future.

Patterns of segregation and poverty persist in Greensboro

Increased diversity has not resulted in integration, and Greensboro still experiences moderate to high levels of racial and ethnic segregation. Compared to other cities in the Triad, Greensboro is the most segregated city overall. This was determined by using the dissimilarity index, a statistical analysis that calculates how disproportionately distributed certain populations are distributed throughout an area. Within the City of Greensboro, White/Black segregation has decreased over the last 30 years, meaning that Whites and Blacks are becoming more integrated. However, White/Hispanic segregation has increased significantly over the same time period, and White/Asian segregation has increased as well. Greensboro has the highest levels of White/Black, White/Asian, and White/Hispanic segregation within the region, with the general trend going towards segregation rather than integration.

Figure 1 : Population Change, 2000-2010

	2000		2010		% Change
	#	%	#	%	
Region	**1,464,979**	**100.0%**	**1,640,717**	**100.0%**	**12.0%**
White	1,099,957	75.1%	1,146,900	69.9%	4.3%
Non-White	365,022	24.9%	493,817	30.1%	20.8%
Black or African American	288,080	19.7%	340,448	20.7%	18.2%
American Indian and Alaska Native	5,271	0.4%	7,970	0.5%	51.2%
Asian/Pacific Islander	18,461	1.3%	33,339	2.0%	80.6%
Some other race	35,867	2.4%	79,979	4.9%	123.0%
Two or more races	17,343	1.2%	32,081	2.0%	85.0%
Hispanic*	72,867	5.0%	142,829	8.7%	96.0%
Greensboro	**223,891**	**100.0%**	**269,666**	**100.0%**	**20.4%**
White	124,243	55.5%	130,396	48.4	5.0%
Non-White	99,648	44.5%	139,270	51.6%	16.0%
Black or African American	83,728	37.4%	109,586	40.6	30.9%
American Indian and Alaska Native	989	40.0%	1,385	0.5	40.0%
Asian/Pacific Islander	6,446	2.9%	10,929	4.1%	69.5%
Some other race	4,647	2.1%	10,290	3.8	121.4%
Two or more races	3,838	1.7%	7,080	2.6	84.5%
Hispanic*	9,742	4.4%	20,336	7.5	108.7%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

High rates of minority concentration exist in Greensboro, along with above-average rates of poverty. When the level of minority concentration exceeds 50% and the poverty rate exceeds 40% in a given area, it is known as a racially concentrated area of poverty, or RCAP. Residents in RCAPs throughout the region tended to have lower incomes, longer commutes, and work in sectors with less potential for upward mobility. Greensboro has 19 Census block groups that have poverty rates and minority concentrations sufficiently high to be classified as RCAPs. These 19 block groups are all in the southern and eastern neighborhoods of central Greensboro. These 19 block groups form three contiguous areas, skirting the southern and eastern border of Downtown Greensboro. These RCAP areas are priority areas from the perspective of infrastructure investment, transportation planning, and quality of life issues.

There are also areas of Greensboro with high levels of poverty and minority concentration, but not as severe as to be classified as an RCAP. These areas are classified as Near-RCAPs. These areas are critical for local stakeholders to monitor: conditions may worsen if nothing is done, but there also exists the potential for catalytic, high-impact investment to prevent the neighborhoods from crossing the threshold to RCAPs. There are 6 contiguous areas like this in Greensboro, all on the borders of an RCAP.

The map on the following page displays the RCAP and Near-RCAP areas of Greensboro, along with the major bus routes:

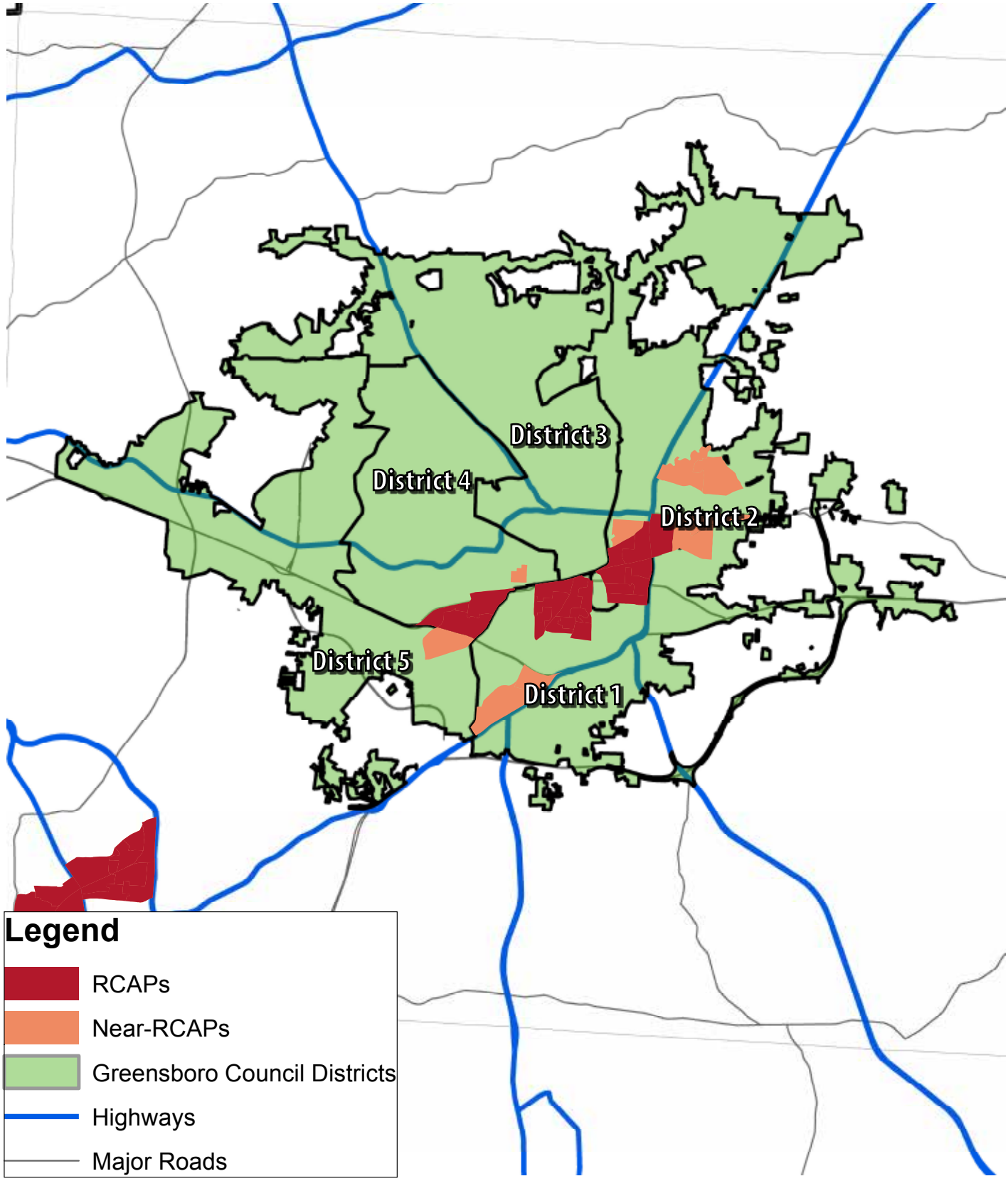
Figure 2 : Local Dissimilarity Indices, 1980-2010

		1980	1990	2000	2010	Trend
Burlington	White and Black	0.59	0.45	0.48	0.42	*Decreasing*
	White and Hispanic*	0.31	0.15	0.41	0.48	*Increasing*
	White and Asian	0.33	0.17	0.26	0.24	*Decreasing*
Greensboro	White and Black	0.71	0.60	0.57	0.57	*Decreasing*
	White and Hispanic*	0.33	0.22	0.46	0.49	*Increasing*
	White and Asian	0.29	0.27	0.35	0.36	*Increasing*
High Point	White and Black	0.64	0.58	0.47	0.46	*Decreasing*
	White and Hispanic*	0.37	0.20	0.47	0.39	*Increasing*
	White and Asian	0.39	0.19	0.35	0.34	*Decreasing*
Surry HOME Consortium	White and Black	0.53	0.33	0.34	0.41	*Decreasing*
	White and Hispanic*	0.52	0.27	0.22	0.25	*Decreasing*
	White and Asian	0.49	0.27	0.32	0.33	*Decreasing*

Source: American Community Survey, 1980-2010

*Hispanic ethnicity is calculated independently of race

MAP 1:
RACIALLY CONCENTRATED AREAS OF POVERTY IN GREENSBORO



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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0 0.5 1 2 Miles

Access to Opportunity

Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of Greensboro

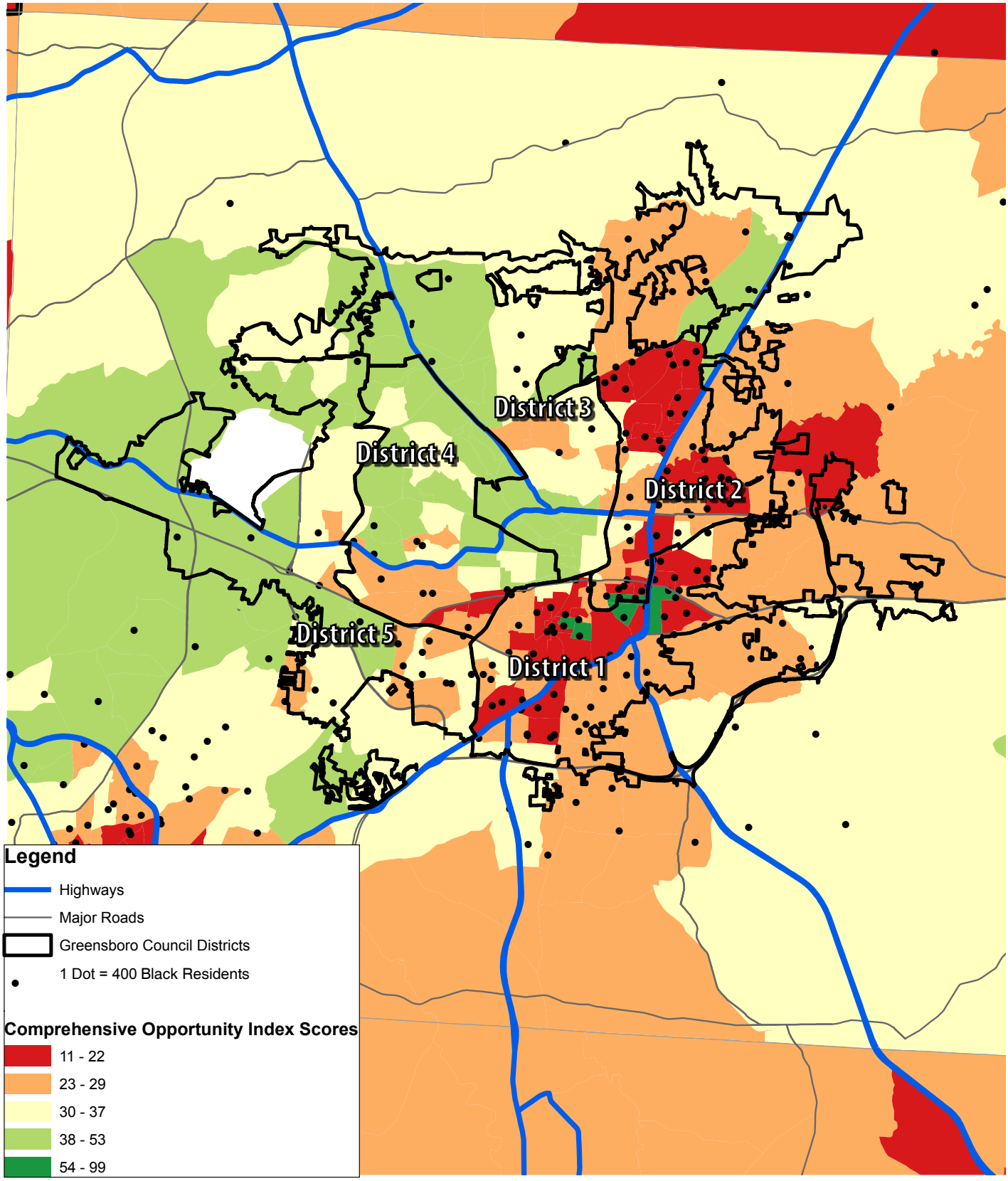
The distribution of opportunity in the region is also uneven, typically in a way that isolates low-income and minority populations from jobs, amenities, and access to good schools and retail services. In Greensboro and the surrounding area in Guilford County, this is the case. Utilizing a technique known as opportunity mapping, the geographic footprint of opportunity and inequality can be quantified and projected onto maps. The resulting maps allow communities such as Greensboro to analyze opportunity at the local level as well as place their situation into a regional context. Key variables were analyzed, and Greensboro's score relative to the region include the following:

- Neighborhood School Proficiency: above average
- Labor Market Engagement: above average
- Prosperity: below average
- Job Access: above average
- Environmental Health Hazard Exposure: below average
- Transit Access: above average

The composite score for Greensboro was 32.4 points, which is higher than the regional average of 29.8 points. It is also higher than the opportunity scores in Burlington, High Point, and the Surry HOME Consortium. Within Greensboro, the highest-scoring areas were concentrated in the western neighborhoods of the city and in the suburbs in western Guilford County between Greensboro and Winston-Salem. The lowest-scoring areas were in southern and eastern Greensboro. These are the same neighborhoods where high levels of poverty and minority concentration exist.

The following maps illustrate the location of Black and Hispanic residents against the backdrop of opportunity areas. Areas with low opportunity scores are shown red, while areas with high opportunity scores are shown in green. Moderate opportunity areas are shown in the intermediate colors. The levels of opportunity in Greensboro very clearly take an east-west polarization. Black and Hispanic residents of Greensboro are clustered in low-opportunity areas, which contain inferior access to basic amenities and resources for upward mobility. However, the presence of some Black residents in the western medium and high scoring opportunity neighborhoods of Greensboro indicates a potential Black middle class not observed in other cities.

MAP 2:
BLACK POPULATION AND AREAS OF OPPORTUNITY IN GREENSBORO



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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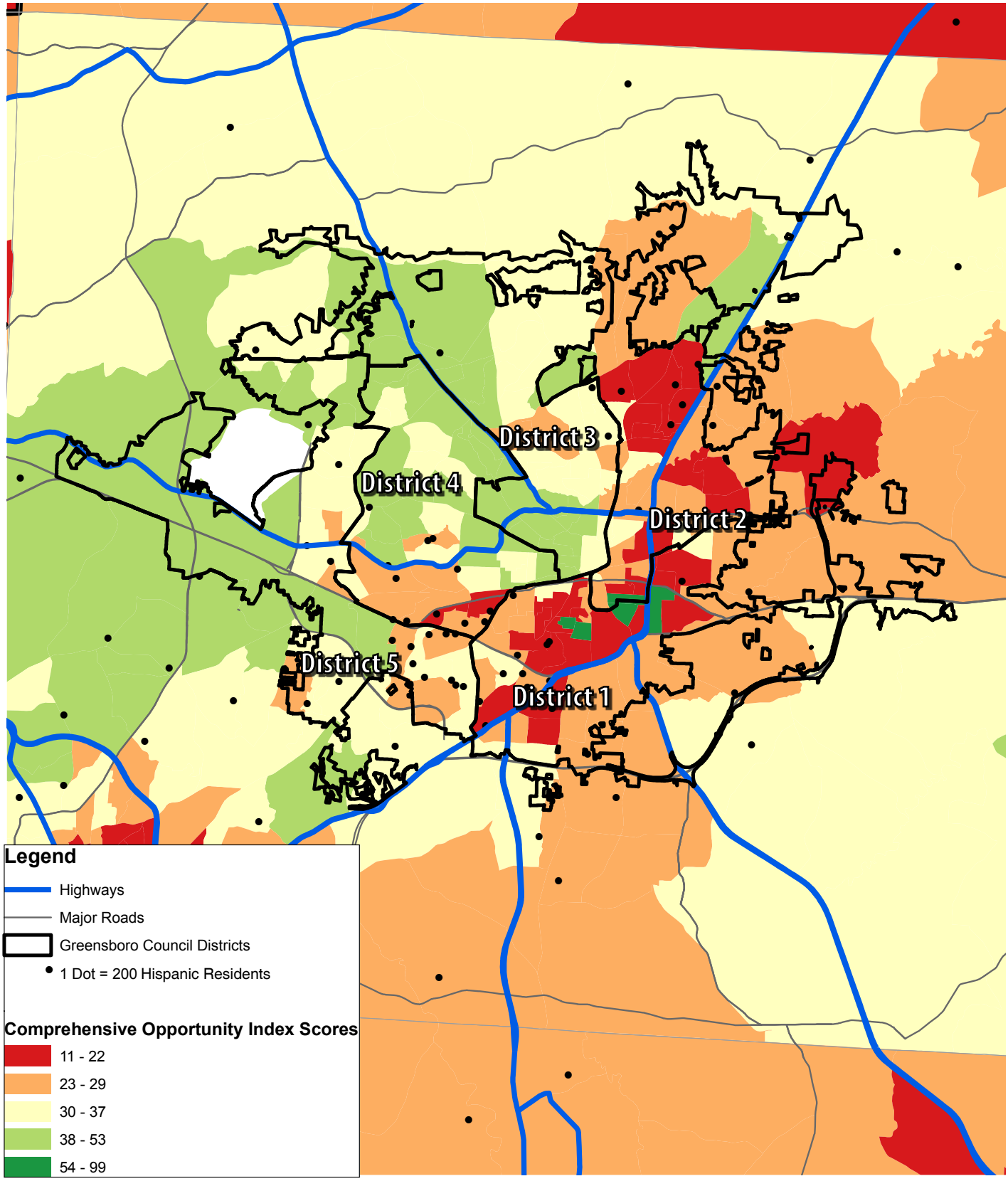
MAP 3:
HISPANIC POPULATION AND AREAS OF OPPORTUNITY IN GREENSBORO



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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Key Housing Trends

Greensboro's supply of housing that is available to lower-income residents is shrinking as demand rises

Housing issues are a major underlying cause of unequal access to opportunity, in both the Piedmont Triad region and in the City of Greensboro. Despite stagnant or declining real incomes in the region, the supply of affordably-priced housing units has shrunk. This has resulted in cost burden (spending over 30% of one's income on housing), overcrowding, and a lack of affordable housing options in high-opportunity areas. These housing issues disproportionately affect members of the protected classes, who also tend to have lower incomes and larger households.

There is a lack of housing that is available to lower-income residents in high-opportunity areas, and members of the protected classes face severe housing challenges

Between 2000 and 2010, real income in Greensboro decreased from $49,180 to $41,530, a loss of 15.6%. While incomes declined across the Piedmont Triad, Greensboro has experienced the sharpest decline in the region. Despite this, the median house value in Greensboro increased 8.8%, from $134,664 to $146,500. Median rent declined from $754 to $717, a decrease of 4.9%, possibly as a reaction to the loss of real income. Households in Greensboro must spend more money on housing, but are making less money overall.

At the same time, market-rate housing is disproportionately filling high-end rental demand rather than addressing the demand for affordable housing. From 2000 to 2010, the number of units in Greensboro renting below $500 decreased 36.7%, and the number of units renting from $500 to $699 decreased 16.1%. Conversely, the number of units renting for $1,000 or more increased 170.7%. Even accounting for inflation, this represents significant shifts in Greensboro's market-rate housing inventory. Given the significant fall in real income, this issue is more severe in Greensboro than in the greater Piedmont Triad region from an affordable housing perspective.

The table below shows the distribution of housing costs for rental units within Greensboro.

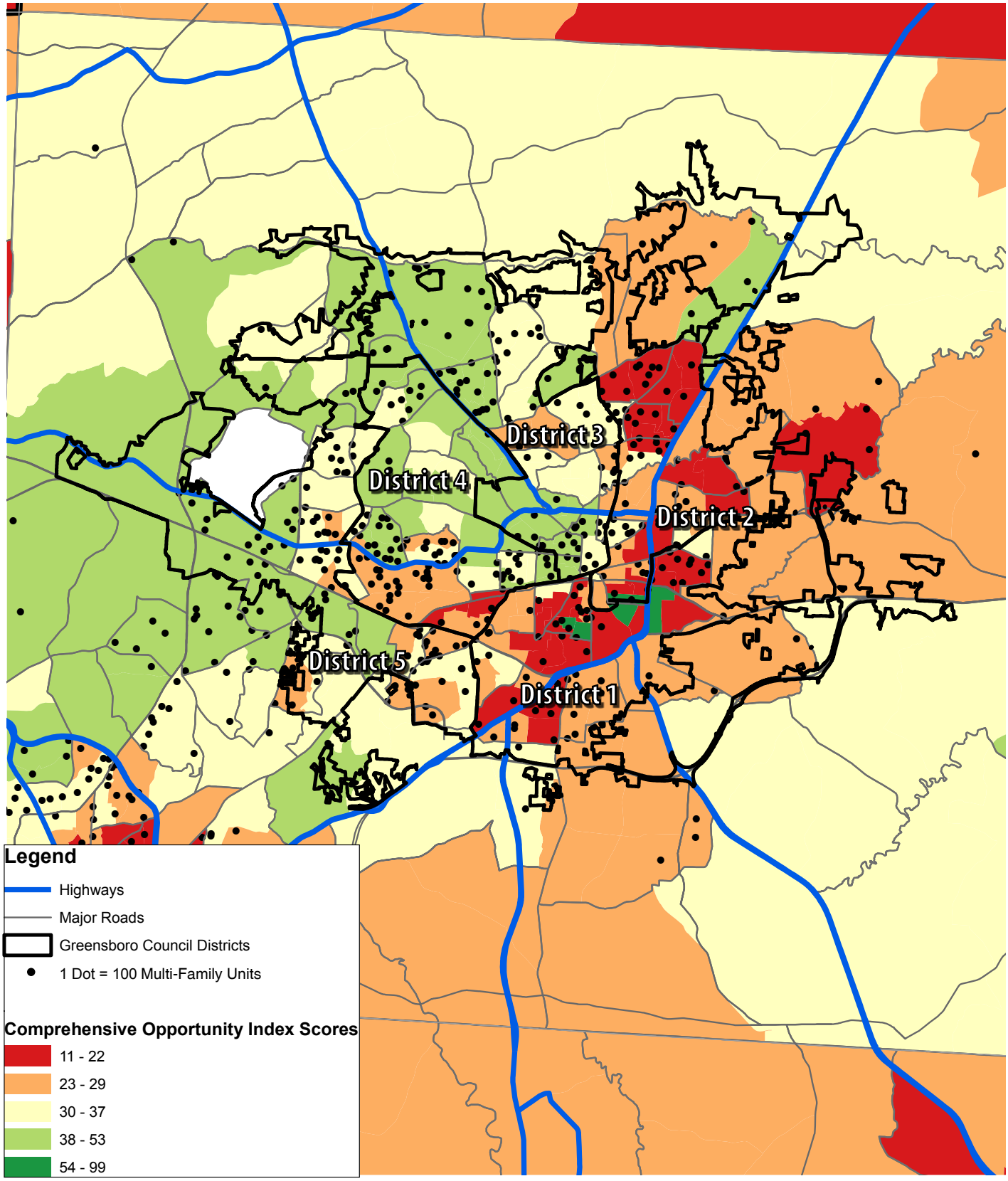
On the following map, each dot represents 50 multi-family housing units, which serves as a rough proxy for affordability. Greensboro has a disproportionate amount of multi-family housing units in low opportunity areas, and very few multi-family units in the high opportunity areas.

Figure 3 : Change in Affordable Rental Housing, 2000-2010

			Change	
Units Renting for:	**2000**	**2010**	**#**	**%**
Region				
Less than $500	72,682	41,995	-30,687	-42.2%
$500 to $699	56,643	64,132	7,489	13.2%
$700 to $999	26,701	57,151	30,450	114.0%
$1000 or More	6,223	22,384	16,161	259.7%
Greensboro				
Less than $500	11,420	7,225	-4,195	-36.7%
$500 to $699	17,605	14,769	-2,836	-16.1%
$700 to $999	10,755	18,034	7,279	67.7%
$1000 or More	2,573	6,964	4,391	170.7%

Source: U.S. Census Bureau, Census 2000 (H062) and 2006-2010 American Community Survey (B25063)

MAP 4:
MULTI-FAMILY UNITS AND AREAS OF OPPORTUNITY IN GREENSBORO



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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For households wanting to invest in buying a home rather than renting, minority household incomes may tend to be too low to achieve homeownership. In Greensboro, the median household income for Whites was $53,221, $30,675 for Blacks, and $33,388 for Hispanics. The maximum purchase price a household making the median income for a White household could pay is approximately $119,000. A household making the median income for a Black household in Greensboro could pay approximately $59,500, and a household making the median income for a Hispanic household in Greensboro could pay approximately $74,000. At these thresholds, only the average median income of Greensboro's White and Asian households is high enough to buy a house in Greensboro priced at or above the median value.

The maximum purchase price for Blacks in Greensboro is extremely low—the second-lowest out of any study areas in the Piedmont Triad—and there are likely very few homes in Greensboro priced at $59,500 and under. This lack of affordably priced homes, combined with tighter credit standards, may force some would-be homebuyers to remain renters, becoming cost burdened, living in overcrowded or substandard conditions, or a combination of these factors. Minorities also face lower rates of mortgage approval in the area: the approval rate in the Piedmont Triad was 65.4% for Whites but only 48.4% for Blacks and 51.4% for Hispanics.

Figure 4 : Maximum Affordable Purchase Price, 2010

		Monthly Mortgage Payment				
	Household Income	Principal and Interest	Real Estate Taxes	Homeowner's Insurance and PMI	Total Debt Service*	Maximum Affordable Purchase Price
Region	**$43,970**	**$595**	**$111**	**$80**	**$1,286**	**$133,000**
Whites	$49,269	$720	$134	$80	$1,434	$161,000
Blacks	$31,318	$280	$52	$80	$912	$62,500
Asians	$48,850	$712	$133	$80	$1,425	$159,000
Hispanics	$31,556	$286	$53	$80	$919	$64,000
Greensboro	**$41,530**	**$533**	**$99**	**$80**	**$1,212**	**$119,000**
Whites	$53,221	$819	$153	$80	$1,552	$183,000
Blacks	$30,675	$266	$50	$80	$896	$59,500
Asians	$43,034	$568	$106	$80	$1,254	$127,000
Hispanics	$33,388	$331	$62	$80	$973	$74,000

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25077, B25103, S1903)

Impediments to Fair Housing Choice

Greensboro faces several policy-related impediments that either directly or indirectly limit fair housing choice

- The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
- The zoning ordinance requires an overlay zone location or special use permit for manufactured homes, imposing a burden on homebuyers seeking low-cost ownership choices and effectively forcing them to other jurisdictions
- The zoning ordinance lacks an accommodation provision for persons with disabilities to request a modification to the statute. Such a zoning provision allows for an eligible applicant to request reasonable accomodation from any provision in a zoning ordinance if any of the two defined thresholds are met
- The zoning ordinance restricts homeless shelters to non-residential districts
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- Discrimination in the rental market on the basis of race and ethnicity, as demonstrated by paired testing.
- Nineteen of the City's 173 block groups (10.9%) were identified as RCAP areas
- The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas

Fair Housing Priorities

Greensboro can take action to address important fair housing priorities

The demographic analysis, opportunity mapping, and housing market analysis found prevalent racially concentrated areas of poverty (or areas approaching these criteria), significant disparities in access to opportunity, and a disproportionate housing need based on protected class status. Factors contributing to these issues in Greensboro are:

1. A need for expanded public transportation to provide RCAP residents and other lower income residents with access to higher opportunity areas and community assets

The need for expanded public transportation service was given the highest priority because it can be implemented incrementally and beginning within a potentially shorter time frame. The extension of public transit routes and expansion of service hours will require capital investment over time.

2. A need for greater affordable and accessible housing opportunities, both rental and sales units, in higher opportunity areas

The need for greater affordable and accessible housing opportunities in higher opportunity areas may require less public financing than expanded public transportation, but it will require a well-designed public education campaign against residential opposition to the development of affordable housing in some areas. This initiative will require time and the investment of significant human resources in the form of political and community leadership to play key roles in any campaign.

3. A need for sustainable employment opportunities within, or in closer proximity to, racially concentrated areas of poverty

The need for sustainable employment opportunities in or near RCAPs will require significant capital investment and time, including planning for potential revitalization, redevelopment and re-use of land and structures that are appropriate for new commercial and industrial uses.

These three priorities have the potential for mitigating each of the determinants of fair housing outlined in the AFH. All three priorities will require financial investments, strong political leadership, substantial changes to long-standing public policies, long-term public education, and lengthy implementation periods. However, none of these challenges should be used as reasons to dismiss the possibility of implementation of any one priority and the potential for cataclysmic change at the local and regional levels.

One of the most pragmatic ways to address these goals is through overcoming policy barriers. Greensboro's zoning ordinance was reviewed and benchmarked to uncover and systematically score its effectiveness in affirmatively furthering fair housing and minimizing discriminatory practices. On a rating of 1 to 2, with 1 being the lowest possible risk for potentially discriminatory provisions and 2 being the highest, Greensboro scored a 1.45. This puts Greensboro's ordinance at a moderate risk relative to discriminatory provisions for housing and members of the protected classes.

There are two direct policy recommendations Greensboro can take to affirmatively further fair housing. Firstly, Greensboro can adopt a policy to explicitly refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing. Secondly, the HOME Program should continue to include and implement the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods.

A Local Fair Housing Action Plan: Goals and Strategies for Greensboro

The goals and strategies established in this section are tailored to Greensboro for inclusion in its Five-Year Consolidated Planning process.

Goal 1: **Improve the physical environment in racially concentrated areas of poverty**

Strategy 1: Continue existing rehabilitation programs to preserve and maintain the City's affordable housing inventory

Strategy 2: Establish an emergency rental housing rehabilitation program with forgivable loans if owners agree not to increase rent after five years

Strategy 3: Establish a formal land banking program as a means of assembling and redeveloping parcels for residential and non-residential areas where existing infrastructure is available

Strategy 4: Continue to target dwelling units cited for code violations for inclusion in the City's housing rehabilitation program

Strategy 5: Continue the City's owner-occupied housing rehabilitation program to maintain and preserve the affordable housing stock in older neighborhoods. Tie this into an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing that is within walking distance from downtown

Strategy 6: Continue to provide homeowner/ homebuyer/financial counseling targeted to lower income households, minority households and households with limited English proficiency (LEP). Educate owners and buyers on predatory lending, high-cost lending and financial management

Strategy 7: Direct CDBG funding support to public improvements in RCAP and Near-RCAP areas

Goal 2: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Support planned investments to transition the hub-and-spoke transit system to more efficient and convenient public transportation routes

Goal 3: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Incentivize development of affordable rental housing in higher opportunity areas

Strategy 2: Modify the City's homebuyer assistance program to increase the individual down payment amount available to eligible purchasers in higher opportunity / higher cost neighborhoods

Strategy 3: Partner with development entities to strategically select parcels for affordable rental housing development in higher opportunity areas

Strategy 4: Incorporate the designation of developable parcels along major corridors and near existing/emerging employment centers as appropriate for multi-family housing in the update of the comprehensive plan. Provide policy guidance on appropriate locations for multi-family housing

Strategy 5: Consider policies that encourage a wide range of affordable housing opportunities, such as micro-units or pocket neighborhoods as affordable housing options for single persons, regardless of income

Strategy 6: Amend the zoning ordinance to include a reasonable accommodation policy for persons with disabilities

Strategy 7: Amend the zoning ordinance to permit manufactured housing as single-family dwelling units

Strategy 8: Continue to encourage mixed residential developments. Consider density bonuses to incentivize mixed residential development

Strategy 9: Greensboro Housing Authority should continue its initiative of paying a higher payment standard for Section 8 voucher holders who are able to secure housing in higher-cost neighborhoods

Strategy 10: Examine and find ways to reduce barriers to accessory unit development

Goal 4: **Increase the awareness of fair housing issues**

Strategy 1: Continue to provide education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and city boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Continue to seek out immigrant populations with limited English proficiency for fair housing education

Strategy 3: Apply for funding to conduct paired testing in the local rental housing market. Examine the feasibility of paired testing in the homebuying market as well

Strategy 4: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients that engage in discriminatory housing behavior

For More Information:

Caitlin Warren, City of Greensboro
caitlin.warren@greensboro-nc.gov

Bill McNeil, Piedmont Triad Regional Council
mcneilplanning@gmail.com

ANALYSIS OF IMPEDIMENTS AND ASSESSMENT OF FAIR HOUSING SUMMARY: HIGH POINT

About the Regional Assessment of Fair Housing

The preparation of this Regional Assessment of Fair Housing (AFH) serves as a component of the Piedmont Triad's efforts to satisfy the requirements of the Housing and Community Development Act of 1974. This legislation applies to any community receiving federal funding through the following programs: Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for Persons With Disabilities, and Emergency Solutions Grant. The AFH covers the entitlement communities of the City of Burlington, the City of Greensboro, the City of High Point, and the Surry HOME Consortium, all of which receive federal funds directly from the Department of Housing and Urban Development (HUD). The four entitlement jurisdictions in the Piedmont Triad collaborated on this expanded Analysis of Impediments, which includes a more thorough Assessment of Fair Housing at a regional scale as well as analyses for each jurisdiction, in response to the Proposed Rule published by HUD on July 19, 2013. To meet current requirements, each jurisdiction has an individualized Executive Summary that highlights its impediments and proposes action strategies to address local issues.

Also covered by this AFH are the non-entitlement areas within the Triad, which are eligible to apply for HUD funding from the North Carolina Small Cities Community Development Block Grant Program. The non-entitled areas include 67 municipalities and 12 counties within the Triad.

The development of the AFH follows the completion of the Regional Fair Housing & Equity Assessment (FHEA) prepared for the Triad by Sills Consulting, LLC. The AFH picks up where the FHEA ended and provides a more in-depth analysis of communities of opportunity as well as a series of determinants of fair housing, priority fair housing issues and a series of recommended strategies that, if implemented, would eliminate the impediments to fair housing choice. This study will also be used to guide and prioritize elements of the Consolidated Plan and Annual Action Plan implementation process for each of the four HUD entitlement jurisdictions.

The Regional AFH provided the basis for High Point's Analyisis of Impediments, which is summarized below and is designed to meet the City's obligation under HUD rules to affirmatively further fair housing.

Top Findings in High Point

- ***High Point is growing and becoming more diverse***
- ***Patterns of segregation and poverty persist in High Point***
- ***Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of High Point***
- ***High Point's supply of housing that is affordable to lower-income residents is shrinking as demand rises***
- ***There is a lack of housing that is affordable to lower-income residents in high-opportunity areas, and members of the protected classes face severe housing challenges***
- ***High Point faces several policy-related impediments that either directly or indirectly limit fair housing choice***
- ***High Point can take action to address important fair housing priorities***

Key Demographic Trends

High Point is growing and becoming more diverse

High Point has shown steady population growth, but is still growing at a slower rate than other cities in the Triad region and the state as a whole. High Point grew 65.1% from 1970 to 2012, compared to 87.2% growth in Greensboro, 31.1% in Burlington, 63.8% in the Piedmont Triad region, and 87.5% in North Carolina. In the decade from 2000 to 2010, High Point's population growth rate (21.6%) exceeded that of Greensboro and the rest of the region.

Like most of the region, High Point is also becoming much more diverse. While the White population increased 7.7% from 2000 to 2010, the non-White population gained 17.5% and the Hispanic population increased 110.8%, becoming the fastest-growing demographic by far. This is the highest rate of Hispanic population growth out of any study area within the Piedmont Triad. The Black population also increased 26.1%. Minorities in High Point tend to have larger families: 83% of Hispanic families in High Point had three or more members, compared to 50.4% for Whites. Because race and ethnicity are protected classes, this increases the importance of fair housing strategies that can accommodate High Point's diversifying population in the future.

Patterns of segregation and poverty persist in High Point

Diversification has not resulted in integration, and High Point still experiences moderate levels of racial and ethnic segregation. This was determined by using the dissimilarity index, a statistical analysis that calculates how disproportionately distributed certain populations are distributed throughout an area. Within High Point, White/Black and White/Asian segregation have both decreased over the last 30 years, meaning that these races are becoming more integrated. However, White/Hispanic segregation has increased slightly over the same period, but shows new integration during the last decade as new Hispanic residents arrived. High Point had higher levels of Black, Hispanic and Asian segregation than the Piedmont Triad region as a whole. Whites and Blacks have historically been and still remain the most segregated two racial groups in High Point.

High rates of minority concentration exist in High Point, along with above-average rates of poverty. High Point has two Census block groups with Black concentration at least 10% above the regional average and 14 Census block groups with Hispanic concentration at least 10% above the regional average.

Figure 5 : Population Change, 2000-2010

	2000		2010		% Change
	#	%	#	%	
Region	**1,464,979**	**100.0%**	**1,640,717**	**100.0%**	**12.0%**
White	1,099,957	75.1%	1,146,900	69.9%	4.3%
Non-White	365,022	24.9%	493,817	30.1%	20.8%
Black or African American	288,080	19.7%	340,448	20.7%	18.2%
American Indian and Alaska Native	5,271	0.4%	7,970	0.5%	51.2%
Asian/Pacific Islander	18,461	1.3%	33,339	2.0%	80.6%
Some other race	35,867	2.4%	79,979	4.9%	123.0%
Two or more races	17,343	1.2%	32,081	2.0%	85.0%
Hispanic*	72,867	5.0%	142,829	8.7%	96.0%
High Point	**85,839**	**100**	**104,371**	**100.0%**	**21.6%**
White	51,985	60.6	55,989	53.6%	7.7%
Non-White	33,854	39.4%	48,382	46.4%	17.5%
Black or African American	27,275	31.8	34,394	33.0%	26.1%
American Indian and Alaska Native	392	0.5	579	0.6%	47.7%
Asian/Pacific Islander	2,889	3.4%	6,390	6.1%	121.2%
Some other race	1,950	2.3	4,573	4.4%	134.5%
Two or more races	1,348	1.6	2,446	2.3%	81.5%
Hispanic*	4,197	4.9	8,847	8.5%	110.8%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

When the level of minority concentration exceeds 50% and the poverty rate exceeds 40% in a given area, it is known as a racially concentrated area of poverty, or RCAP. Residents in RCAPs throughout the region tended to have lower incomes, longer commutes, and work in sectors with less potential for upward mobility. High Point has a large RCAP area with multiple block groups in the southern and eastern neighborhoods of the city, including Southside and East Central. There are also areas of High Point with high levels of poverty and minority concentration, but not as severe as to be classified as an RCAP. These areas are classified as Near-RCAPs, which are defined as block groups with poverty rates at least 10% above the average were clustered in a single contiguous area encompassing the southern neighborhoods of High Point. These areas are critical for local stakeholders to monitor: conditions may worsen if nothing is done, but there also exists the potential for catalytic, high-impact investment to prevent the neighborhoods from crossing the threshold to RCAPs.

The following map displays the RCAP and Near-RCAP areas of High Point.

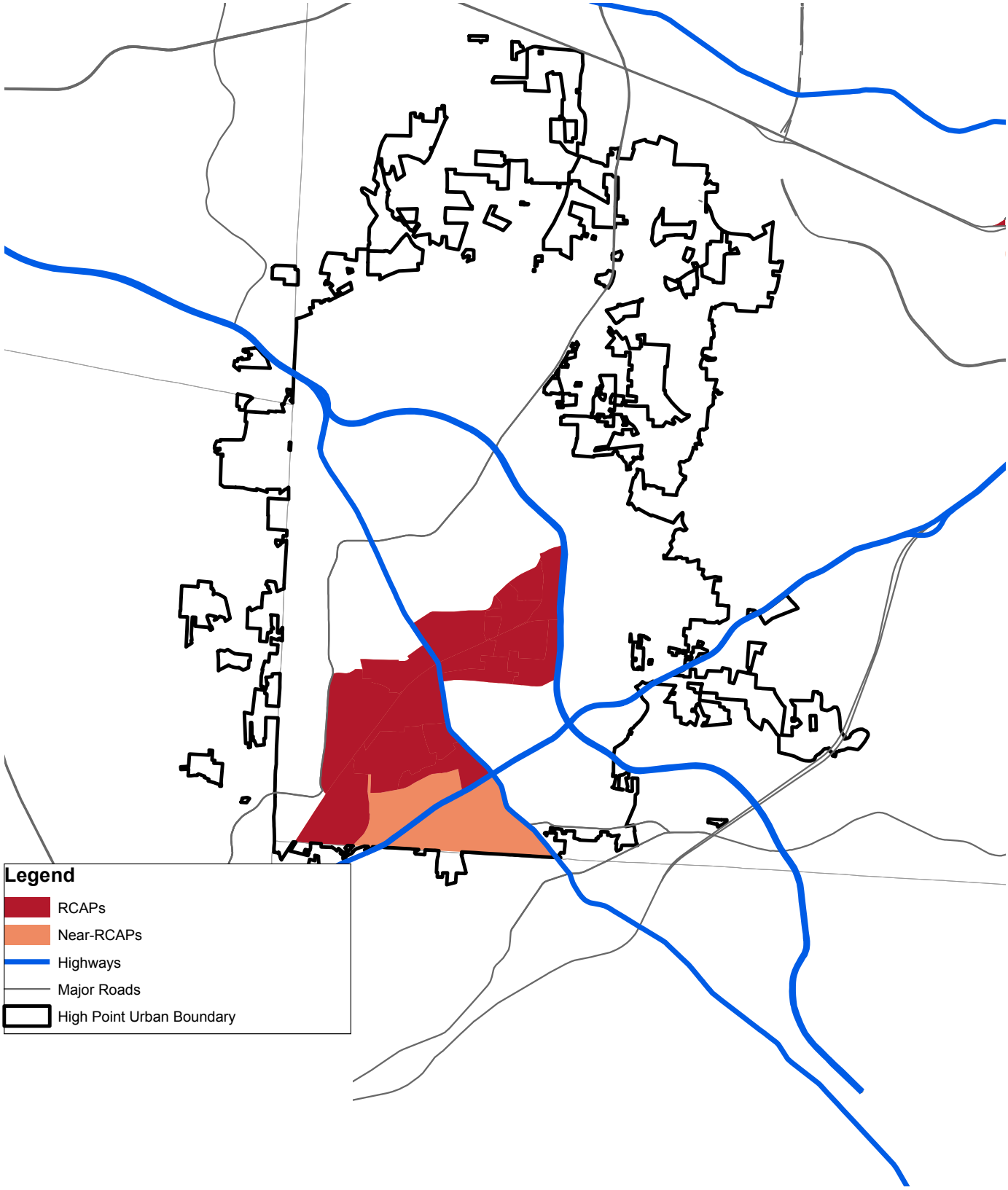
Figure 6 : Local Dissimilarity Indices, 1980-2010

		1980	1990	2000	2010	Trend
Burlington	White and Black	0.59	0.45	0.48	0.42	*Decreasing*
	White and Hispanic*	0.31	0.15	0.41	0.48	*Increasing*
	White and Asian	0.33	0.17	0.26	0.24	*Decreasing*
Greensboro	White and Black	0.71	0.60	0.57	0.57	*Decreasing*
	White and Hispanic*	0.33	0.22	0.46	0.49	*Increasing*
	White and Asian	0.29	0.27	0.35	0.36	*Increasing*
High Point	White and Black	0.64	0.58	0.47	0.46	*Decreasing*
	White and Hispanic*	0.37	0.20	0.47	0.39	*Increasing*
	White and Asian	0.39	0.19	0.35	0.34	*Decreasing*
Surry HOME Consortium	White and Black	0.53	0.33	0.34	0.41	*Decreasing*
	White and Hispanic*	0.52	0.27	0.22	0.25	*Decreasing*
	White and Asian	0.49	0.27	0.32	0.33	*Decreasing*

Source: American Community Survey, 1980-2010

*Hispanic ethnicity is calculated independently of race

MAP 5:
RACIALLY CONCENTRATED AREAS OF POVERTY IN HIGH POINT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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Access to Opportunity

Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of High Point

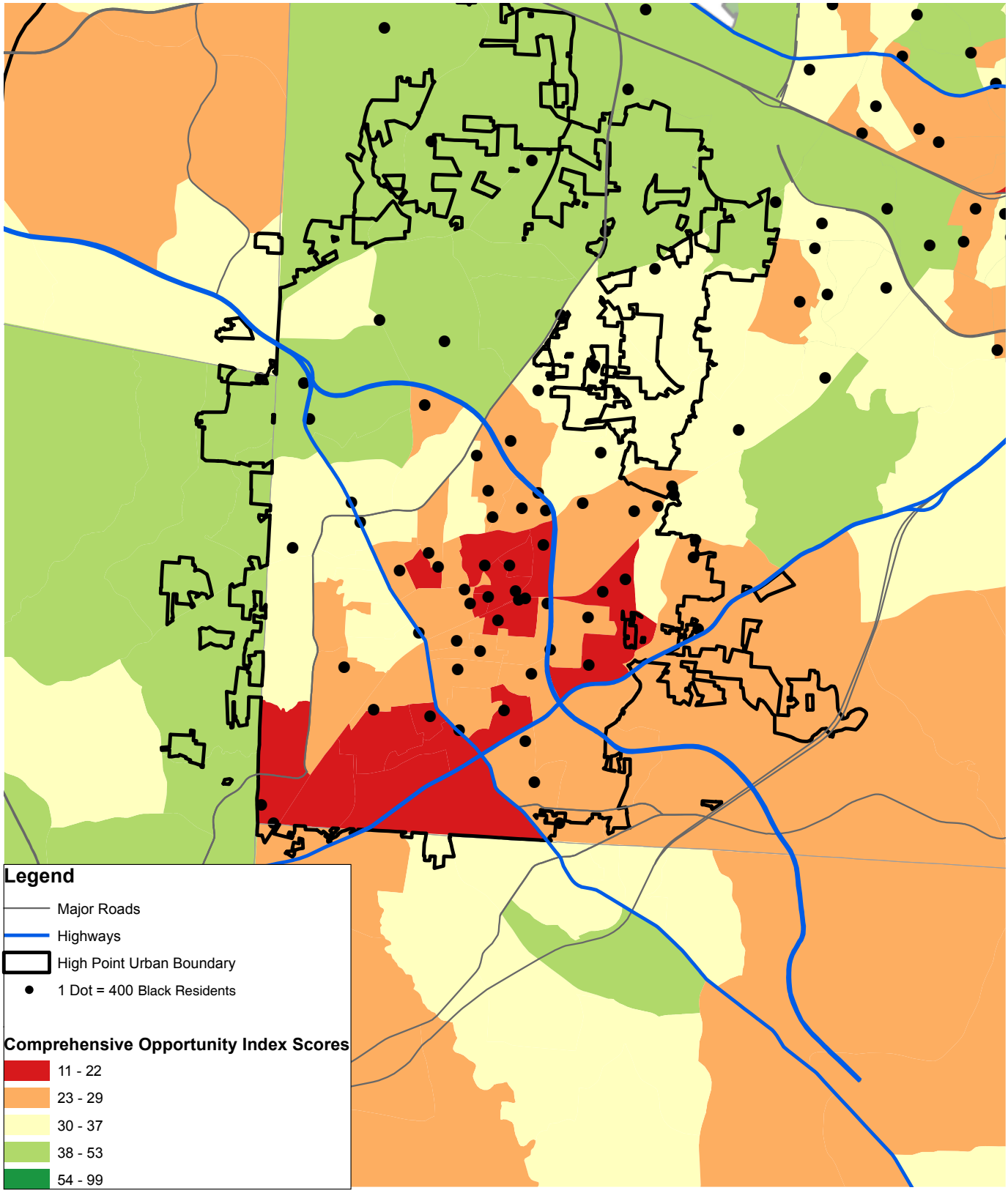
The distribution of opportunity in the region is also uneven, typically in a way that isolates low-income and minority populations from jobs, amenities, and suburban housing opportunities. In High Point and the surrounding area in Guilford County, this is the case. Utilizing a technique known as opportunity mapping, the geographic footprint of opportunity and inequality can be quantified and projected onto maps. The resulting maps allow communities such as High Point to analyze opportunity at the local level as well as place their situation into a regional context. Key variables were analyzed, and High Point's score relative to the region include the following:

- Neighborhood School Proficiency: above average
- Labor Market Engagement: above average
- Prosperity: below average
- Job Access: above average
- Environmental Health Hazard Exposure: below average
- Transit Access: above average

The composite score for High Point, which weighs each variable equally to estimate overall opportunity, was 29.1 points. This is very close to the regional average of 29.8 points. Opportunity is lower in High Point than in Greensboro and Burlington, and the four-county Surry HOME Consortium. Within High Point, the highest-scoring areas were concentrated in the northern neighborhoods of the city and in the suburbs in Guilford County near Greensboro and Winston-Salem. The lowest-scoring areas were in southern and central High Point. These are the same neighborhoods where high levels of poverty and minority concentration exist.

The following maps illustrate the location of Black and Hispanic residents against the backdrop of opportunity areas. Areas with low opportunity scores are shown red, while areas with high opportunity scores are shown in green. Moderate opportunity areas are shown in the intermediate colors. The levels of opportunity in High Point very clearly take a north-south polarization. Black residents of High Point—and Hispanic residents to a lesser extent—are clustered in low-opportunity areas, which contain inferior access to basic amenities and resources for upward mobility.

MAP 6:
BLACK POPULATION AND AREAS OF OPPORTUNITY IN HIGH POINT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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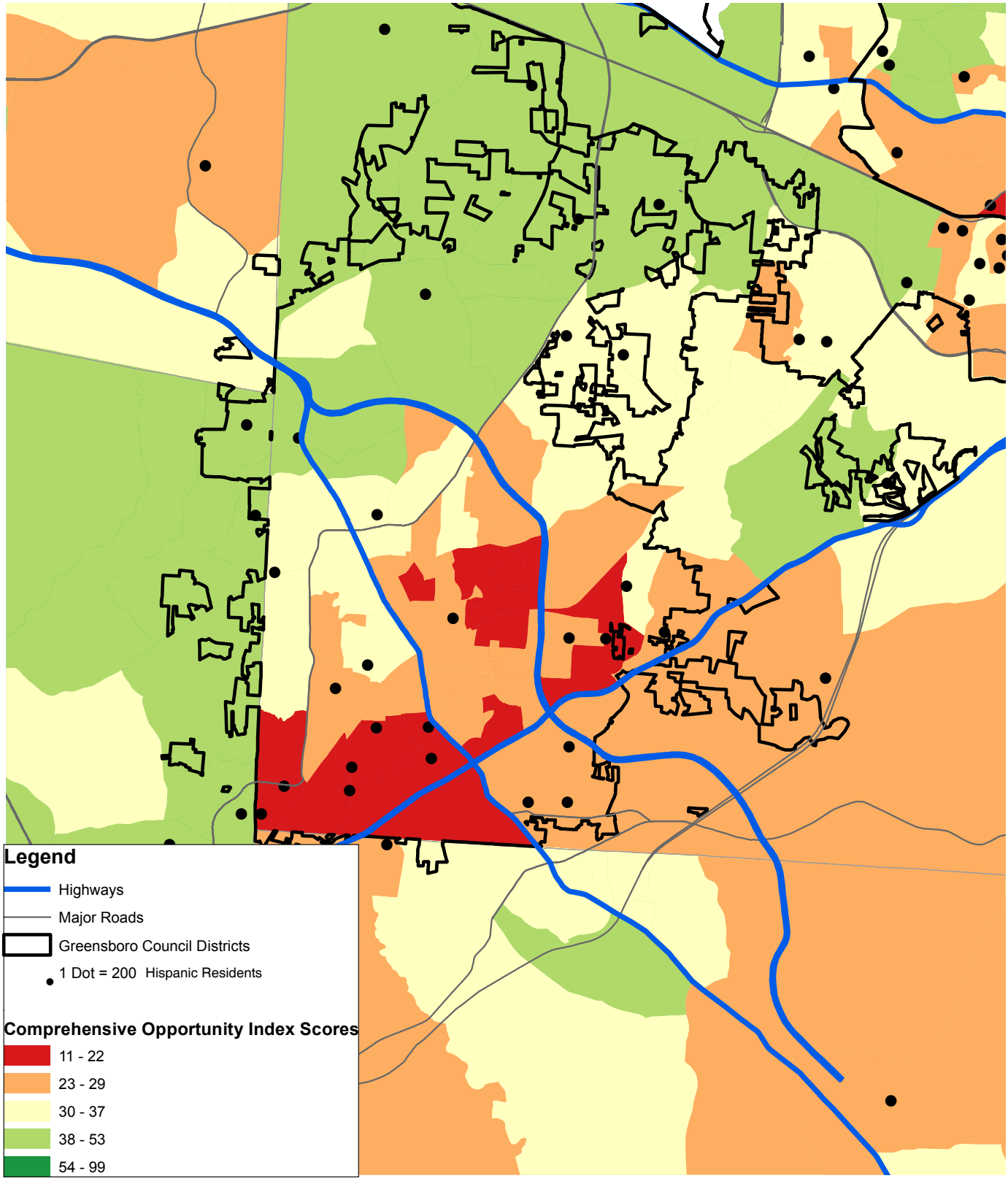
MAP 7:
HISPANIC POPULATION AND AREAS OF OPPORTUNITY IN HIGH POINT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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Key Housing Trends

High Point's supply of housing affordable to lower-income residents is shrinking as demand rises

Housing issues are a major underlying cause of unequal access to opportunity, in both the Piedmont Triad region and in the City of High Point. Despite stagnant or declining real incomes in the region, the supply of affordably-priced housing units has shrunk. This has resulted in cost burden (spending over 30% of one's income on housing), overcrowding, and a lack of affordable housing options in high-opportunity areas. These housing issues disproportionately affect members of the protected classes, who also tend to have lower incomes and larger households.

There is a lack of housing affordable to lower-income residents in high-opportunity areas, and members of the protected classes face severe housing challenges

Between 2000 and 2010, real income in High Point decreased from $49,770 to $43,594, a loss of 12.4%. However, the median house value in High Point increased 11.1%, from $129,208 to $143,500. Median rent also increased from $655 to $720, an increase of 10%. Households in High Point must spend more money on housing, but are making less. While incomes throughout the Piedmont Triad declined between 2000 and 2010, incomes in High Point declined more severely. Both median housing values and median rents also rose at a higher rate than in Greensboro, Burlington, or the Surry HOME Consortium.

At the same time, market-rate housing is disproportionately filling high-end rental demand rather than addressing the demand for affordable housing. From 2000 to 2010, the number of units in High Point renting below $500 decreased 53%, and the number of units renting from $500 to $699 decreased 6.4%. Conversely, the number of units renting for $1,000 or more increased 485%. Even accounting for inflation, this represents significant shifts in High Point's market-rate housing inventory. This issue is more severe in High Point than in the Piedmont Triad region as a whole.

The table below shows the distribution of housing costs for rental units within High Point, in comparison to other areas in the Piedmont Triad.

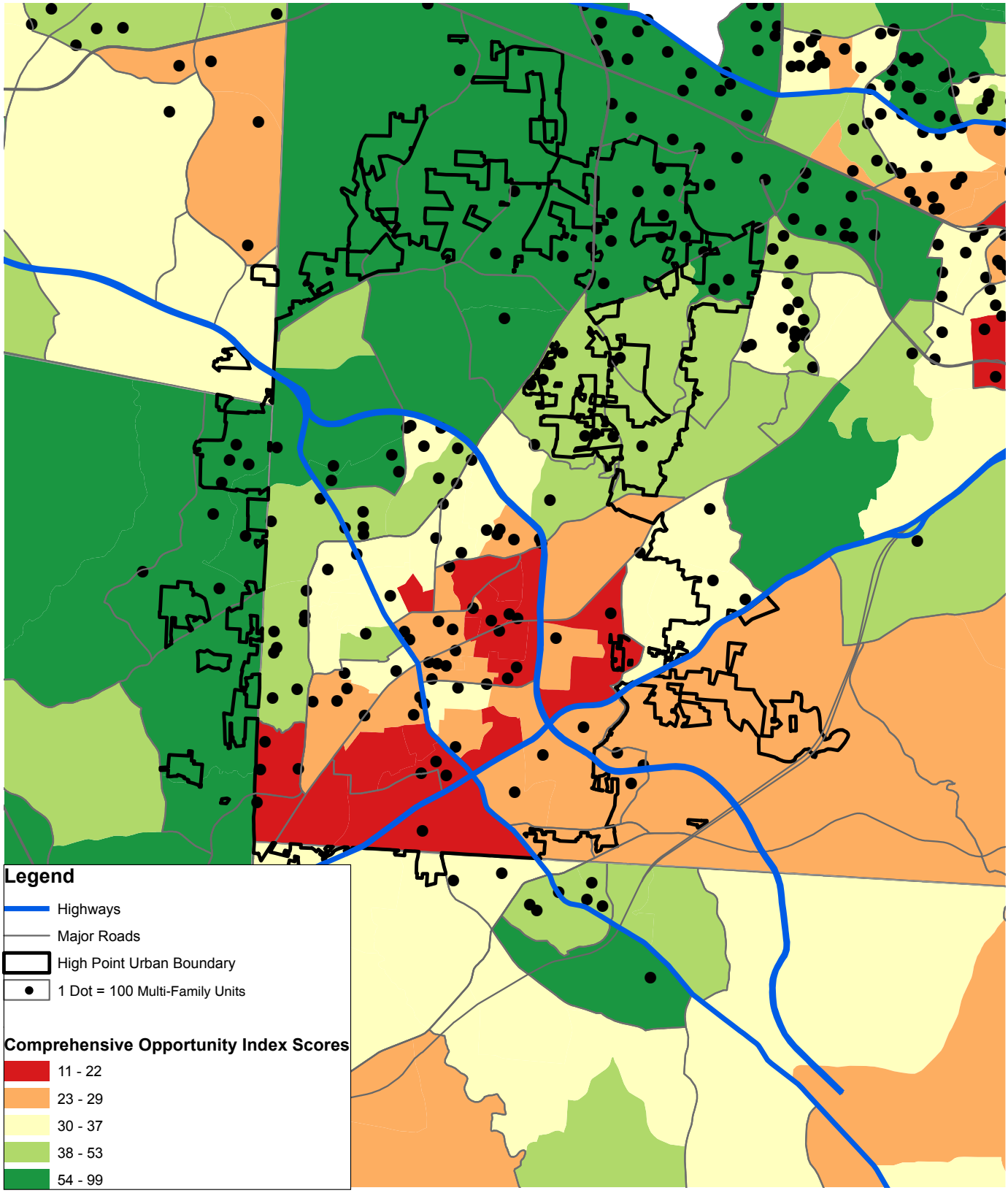
On the following map, each dot represents 50 multi-family housing units, which serves as a rough proxy for affordability. Unlike many of the other urban areas in the Piedmont Triad, High Point's multi-family units are concentrated in areas of moderate opportunity rather than in areas of low opportunity. However, there are fewer multi-family housing units in the areas of High Point with higher levels of opportunity.

Figure 7 : Change in Affordable Rental Housing, 2000-2010

			Change	
Units Renting for:	**2000**	**2010**	**#**	**%**
Region				
Less than $500	72,682	41,995	-30,687	-42.2%
$500 to $699	56,643	64,132	7,489	13.2%
$700 to $999	26,701	57,151	30,450	114.0%
$1000 or More	6,223	22,384	16,161	259.7%
High Point				
Less than $500	5,947	2,797	-3,150	-53.0%
$500 to $699	4,718	4,415	-303	-6.4%
$700 to $999	2,111	5,608	3,497	165.7%
$1000 or More	430	2,518	2,088	485.6%

Source: U.S. Census Bureau, Census 2000 (H062) and 2006-2010 American Community Survey (B25063)

MAP 8:
MULTI-FAMILY UNITS AND AREAS OF OPPORTUNITY IN HIGH POINT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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For Section 8 Housing Choice voucher holders, finding housing in a higher opportunity area may be difficult and pose a concern from a fair housing perspective. Mapping the locations of Section 8 vouchers reveals that voucher holders are concentrated in low opportunity areas within High Point. The largest cluster of voucher holders was in central High Point, in the neighborhoods east of the downtown area. The clusters of voucher holders are in areas ranging from moderate opportunity to extremely low opportunity, but are predominantly in the lower scoring areas. Conversely, there are very few Section 8 voucher holders in the higher opportunity areas of High Point. This indicates that Section 8 voucher holders are concentrating in areas that have inferior resources and economic characteristics, decreasing the potential for upward mobility and perhaps indicating issues with accessing affordable housing in High Point's higher opportunity areas.

The following map plots the locations of Section 8 voucher holders against the backdrop of opportunity scores in High Point.

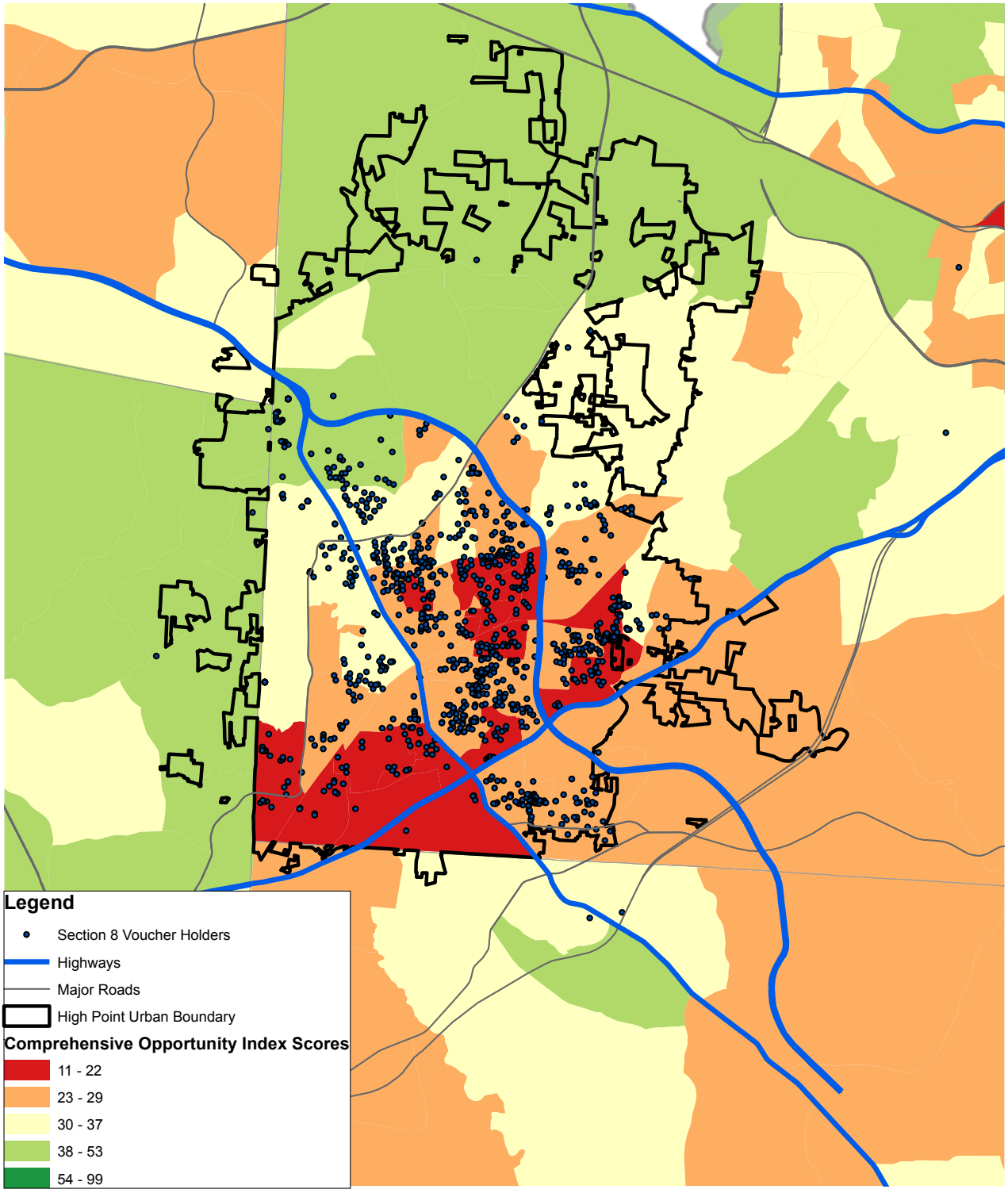
For households wanting to invest in buying a home rather than renting, minority household incomes may tend to be too low to achieve homeownership. In High Point, the median household income for Whites was $53,039, $30,788 for Blacks, and $35,967 for Hispanics. The maximum purchase price a household making the median income for a White household could pay is approximately $182,000. A household making the median income for a Black household in High Point could pay approximately $60,000, and a household making the median income for a Hispanic household in High Point could pay approximately $88,000. At these thresholds, only the average median income of High Point's White households is high enough to buy a house in High Point priced at the median value. The maximum purchase price for Blacks in High Point is extremely low—the second-lowest out of any study areas in the Piedmont Triad—and there are likely very few homes in High Point priced at $62,000 and under. This lack of affordable housing may force some households into renting, becoming cost burdened, living in overcrowded or substandard conditions, or a combination of these factors. Minorities also face lower rates of mortgage approval in the area: the approval rate in the Piedmont Triad was 65.4% for Whites but only 48.4% for Blacks and 51.4% for Hispanics.

Figure 8 : Maximum Affordable Purchase Price, 2010

		Monthly Mortgage Payment				
	Household Income	Principal and Interest	Real Estate Taxes	Homeowner's Insurance and PMI	Total Debt Service*	Maximum Affordable Purchase Price
Region	**$43,970**	**$595**	**$111**	**$80**	**$1,286**	**$133,000**
Whites	$49,269	$720	$134	$80	$1,434	$161,000
Blacks	$31,318	$280	$52	$80	$912	$62,500
Asians	$48,850	$712	$133	$80	$1,425	$159,000
Hispanics	$31,556	$286	$53	$80	$919	$64,000
High Point	**$43,594**	**$582**	**$108**	**$80**	**$1,270**	**$130,000**
Whites	$53,039	$814	$152	$80	$1,546	$182,000
Blacks	$30,788	$269	$50	$80	$899	$60,000
Asians	$42,679	$559	$104	$80	$1,243	$125,000
Hispanics	$35,967	$394	$73	$80	$1,047	$88,000

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25077, B25103, S1903)

MAP 9:
SECTION 8 VOUCHER HOLDERS AND AREAS OF OPPORTUNITY IN HIGH POINT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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0 0.5 1 2 Miles

Figure 9 : Locations of Section 8 Voucher Holders by Opportunity Score, High Point

	Very Low		Low Opportunity		Moderate		High Opportunity		Very High		Total
	#	%	#	%	#	%	#	%	#	%	#
High Point Section 8 Voucher Holders	371	25.96%	485	33.94%	306	21.41%	125	8.75%	106	7.42%	1429

Impediments to fair housing choice

High Point faces several policy-related impediments that either directly or indirectly limit fair housing choice

- The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
- The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute
- The zoning ordinance restricts homeless shelters to non-residential districts
- The zoning ordinance requires an overlay district or special permit for manufactured housing
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- Sixteen out of the City's 67 block groups (23.8%) were identified as RCAP areas
- The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
- A lack of paired testing in the housing market

Fair Housing Priorities

High Point can take action to address important fair housing priorities

The demographic analysis, opportunity mapping, and housing market analysis found prevalent racially concentrated areas of poverty (or areas approaching these criteria), significant disparities in access to opportunity, and a disproportionate housing need based on protected class status. Factors contributing to these issues in High Point are:

1. A need for expanded public transportation to provide RCAP residents and other lower income residents with access to higher opportunity areas and community assets

The need for expanded public transportation service was given the highest priority because it can be implemented incrementally and beginning within a potentially shorter time frame. The extension of public transit routes and expansion of service hours will require capital investment over time.

2. a need for greater affordable and accessible housing opportunities, both rental and sales units, in higher opportunity areas

The need for greater affordable and accessible housing opportunities in higher opportunity areas may require less public financing than expanded public transportation, but it will require a well-designed public education campaign against residential opposition to the development of affordable housing in some areas. This initiative will require time and the investment of significant human resources in the form of political and community leadership to play key roles in any campaign.

3. A need for sustainable employment opportunities within, or in closer proximity to, racially concentrated areas of poverty

The need for sustainable employment opportunities in or near RCAPs will require significant capital investment and time, including planning for potential revitalization, redevelopment and re-use of land and structures that are appropriate for new commercial and industrial uses.

These three priorities have the potential for mitigating each of the determinants of fair housing outlined in the AFH. All three priorities will require financial investments, strong political leadership, substantial changes to long-standing public policies, long-term public education, and lengthy implementation periods. However, none of these challenges should be used as reasons to dismiss the possibility of implementation of any one priority and the potential for cataclysmic change at the local and regional levels.

One of the most pragmatic ways to address these goals is through overcoming policy barriers. High Point's zoning ordinance was reviewed and benchmarked to uncover and systematically score its effectiveness in affirmatively furthering fair housing and minimizing discriminatory practices. On a rating of 1 to 2, with 1 being the lowest possible risk for potentially discriminatory provisions and 2 being the highest, High Point scored a 1.36. This puts High Point's ordinance at a moderate risk relative to discriminatory provisions for housing and members of the protected classes.

There are several practical direct actions the City of High Point can undertake in a short time frame in order to affirmatively further fair housing. Firstly, High Point can continue to incorporate required compliance with the federal Fair Housing Act in all HUD program sub-recipient agreements. Secondly, High Point can adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing. Thirdly, High Point should confirm that their HOME Program includes and implements the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods.

A Local Fair Housing Action Plan: Goals and Strategies for High Point

The goals and strategies established in this section are tailored to High Point for inclusion in its Five-Year Consolidated Planning process.

Goal 1: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Examine revising the City's hub-and-spoke transportation routes to more readily connect areas in the South with employment centers in the North

Strategy 2: Prioritize the creation of a citywide sidewalk network within the capital improvement plan in order to increase multi-modal transit access

Strategy 3: Expand public transportation routes to serve new multi-family development

Goal 2: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Invest and prioritize the City's HOME, CDBG and other grant funding as appropriate to provide incentives for the development of affordable family rental housing in higher opportunity areas

Strategy 2: Modify the City's homebuyer assistance program to increase the individual down payment amount available to eligible purchasers in higher opportunity / higher cost neighborhoods

Strategy 3: Incorporate the Site and Neighborhood Standards criteria of the HOME program into the local site selection process

Strategy 4: Partner with High Point Housing Authority to strategically select parcels for affordable family rental housing development in higher opportunity areas

Strategy 5: Complete the Development Ordinance Update and incorporate innovative provisions such as accessory dwelling units by-right, single-room occupancy (SRO) units and micro-units regardless of income

Strategy 6: Provide market-based density bonuses and other incentives to encourage mixed-income residential developments

Strategy 7: Explore the possibility of establishing a local trust fund to directly address the City's affordable housing needs

Strategy 8: Amend the zoning ordinance to include a reasonable accommodation policy for persons with disabilities

Goal 3: **Increase the awareness of fair housing education and outreach**

Strategy 1: Continue the City's initiatives to provide education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Seek out immigrant populations with limited English proficiency for fair housing education

Strategy 3: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients that engage in discriminatory housing behavior

Strategy 4: Conduct paired testing in the rental housing market

Goal 4: **Improve the physical environment in racially concentrated areas of poverty**

Strategy 1: Continue the City's Lead Safe High Point Program to remediate lead hazards from affordable housing occupied by lower income families with children

Strategy 2: Continue the City's Community Based Initiatives Program to improve the quality of life for persons and households in lower income neighborhoods

Strategy 3: Continue to support the neighborhood organizations that work to revitalize lower income neighborhoods and empower residents

Strategy 4: Study the feasibility of establishing a land bank in the City as a means of redeveloping parcels for residential and non-residential land use where existing infrastructure is available

Strategy 5: Expand the City's owner-occupied housing rehabilitation program to extend beyond primarily weatherization and code enforcement violations to approach home repair more comprehensively

Strategy 6: Develop an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing

Strategy 7: Continue the City's Homeownership Education Classes for homeowner / homebuyer / financial counseling for lower income households, minority households and households with limited English proficiency (LEP) for the purpose of educating owners and buyers on predatory lending, high-cost lending and financial management

Strategy 8: Allocate CDBG assistance for public facilities and infrastructure in RCAP and near-RCAP areas

For More Information:
Mike McNair, City of High Point
michael.mcnair@highpointnc.gov

Bill McNeil, Piedmont Triad Regional Council
mcneilplanning@gmail.com

ANALYSIS OF IMPEDIMENTS AND ASSESSMENT OF FAIR HOUSING SUMMARY: BURLINGTON

About the Regional Assessment of Fair Housing

The preparation of this Regional Assessment of Fair Housing (AFH) serves as a component of the Piedmont Triad's efforts to satisfy the requirements of the Housing and Community Development Act of 1974. This legislation applies to any community receiving federal funding through the following programs: Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for Persons With Disabilities, and Emergency Solutions Grant. The AFH covers the entitlement communities of the City of Burlington, the City of Greensboro, the City of High Point, and the Surry HOME Consortium, all of which receive federal funds directly from the Department of Housing and Urban Development (HUD). The four entitlement jurisdictions in the Piedmont Triad collaborated on this expanded Analysis of Impediments, which includes a more thorough Assessment of Fair Housing at a regional scale as well as analyses for each jurisdiction, in response to the Proposed Rule published by HUD on July 19, 2013. To meet current requirements, each jurisdiction has an individualized Executive Summary that highlights its impediments and proposes action strategies to address local issues.

Also covered by this AFH are the non-entitlement areas within the Triad, which are eligible to apply for HUD funding from the North Carolina Small Cities Community Development Block Grant Program. The non-entitled areas include 67 municipalities and 12 counties within the Triad.

The development of the AFH follows the completion of the Regional Fair Housing & Equity Assessment (FHEA) prepared for the Triad by Sills Consulting, LLC. The AFH picks up where the FHEA ended and provides a more in-depth analysis of communities of opportunity as well as a series of determinants of fair housing, priority fair housing issues and a series of recommended strategies that, if implemented, would eliminate the impediments to fair housing choice. This study will also be used to guide and prioritize elements of the Consolidated Plan and Annual Action Plan implementation process for each of the four HUD entitlement jurisdictions.

The Regional AFH provided the basis for Burlington's Analysis of Impediments, which is summarized below and is designed to meet the City's obligation under HUD rules to affirmatively further fair housing.

Top Findings in Burlington

- ***Burlington is growing and diversifying***
- ***Patterns of segregation and poverty persist in Burlington***
- ***Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of Burlington***
- ***Burlington's supply of housing that is affordable to lower-income residents is shrinking as demand rises***
- ***There is a lack of affordable housing in high-opportunity areas, and members of the protected classes face severe housing challenges***
- ***Burlington faces several policy-related impediments that either directly or indirectly limit fair housing choice***
- ***Burlington can take action to address important fair housing priorities***

Key Demographic Trends

Burlington is growing and diversifying

Burlington has shown steady population growth, but is still growing at a slower rate than other cities in the Triad region and the state as a whole. Burlington grew 39.1% from 1970 to 2012, compared to 87.2% in Greensboro, 65.1% in High Point, and 87.5% in North Carolina.

Like most of the region, Burlington is also becoming much more diverse. While the non-White population declined 3.4% from 2000 to 2010, the Hispanic population increased 76.6%, becoming the fastest-growing demographic by far. The Black population also increased 24.4%. Minorities in Burlington tend to have larger families: 88.4% of Hispanic families in Burlington had three or more members, compared to 48.8% for Whites. Because race and ethnicity are protected classes, this increases the importance of fair housing strategies that can accommodate Burlington's diversifying population in the future.

Patterns of segregation and poverty persist in Burlington

Diversification has not resulted in integration, and Burlington still experiences moderate to high levels of racial and ethnic segregation. This was determined by using the dissimilarity index, a statistical analysis that calculates how disproportionately distributed certain populations are throughout an area. Within Burlington, White/Black and White/Asian segregation have both decreased over the last 30 years, meaning that these races are becoming more integrated. However, White/Hispanic segregation has increased significantly over the same time period. Burlington had lower levels of Black and Asian segregation, but a higher level of Hispanic segregation, than the Piedmont Triad region as a whole. Whites and Hispanics are now more segregated in Burlington than Whites and Blacks.

Figure 10 : Population Change, 2000-2010

	2000		2010		% Change
	#	%	#	%	
Region	**1,464,979**	**100.0%**	**1,640,717**	**100.0%**	**12.0%**
White	1,099,957	75.1%	1,146,900	69.9%	4.3%
Non-White	365,022	24.9%	493,817	30.1%	20.8%
Black or African American	288,080	19.7%	340,448	20.7%	18.2%
American Indian and Alaska Native	5,271	0.4%	7,970	0.5%	51.2%
Asian/Pacific Islander	18,461	1.3%	33,339	2.0%	80.6%
Some other race	35,867	2.4%	79,979	4.9%	123.0%
Two or more races	17,343	1.2%	32,081	2.0%	85.0%
Hispanic*	72,867	5.0%	142,829	8.7%	96.0%
Burlington	**44,917**	**100**	**49,963**	**100**	**11.2%**
White	29,766	66.3	28,760	57.6	-3.4%
Non-White	15,151	33.7%	21,203	42.4%	25.8%
Black or African American	11,252	25.1	13,998	28	24.4%
American Indian and Alaska Native	154	0.3	335	0.7	117.5%
Asian/Pacific Islander	782	1.7%	1,062	2.1%	35.8%
Some other race	2,316	5.2	4,584	9.2	97.9%
Two or more races	647	1.4	1,224	2.4	89.2%
Hispanic*	4,525	10.1	7,990	16	76.6%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

High rates of minority concentration exist in Burlington, along with above-average rates of poverty. Burlington has two Census block groups with Black concentration at least 10% above the regional average and 14 Census block groups with Hispanic concentration at least 10% above the regional average. Block groups with poverty rates at least 10% above the average were clustered in a single contiguous area encompassing the north and east neighborhoods of Burlington.

When the level of minority concentration exceeds 50% and the poverty rate exceeds 40% in a given area, it is known as a racially concentrated area of poverty, or RCAP. Residents in RCAPs throughout the region tended to have lower incomes, longer commutes, and work in sectors with less potential for upward mobility.

While Burlington does not have any RCAPs, there are nine contiguous block groups that approach these thresholds. East Burlington has a high poverty rate, but not a sufficiently high concentration of minorities to be classified as an RCAP. The levels of poverty and minority concentration in the northern area of Burlington are high, but not as severe as to be classified as an RCAP. This area is critical for local stakeholders to monitor: conditions may worsen if nothing is done, but there also exists the potential for catalytic, high-impact investment to prevent the neighborhoods from crossing the threshold to RCAPs.

The following map displays the Near-RCAP areas of Burlington.

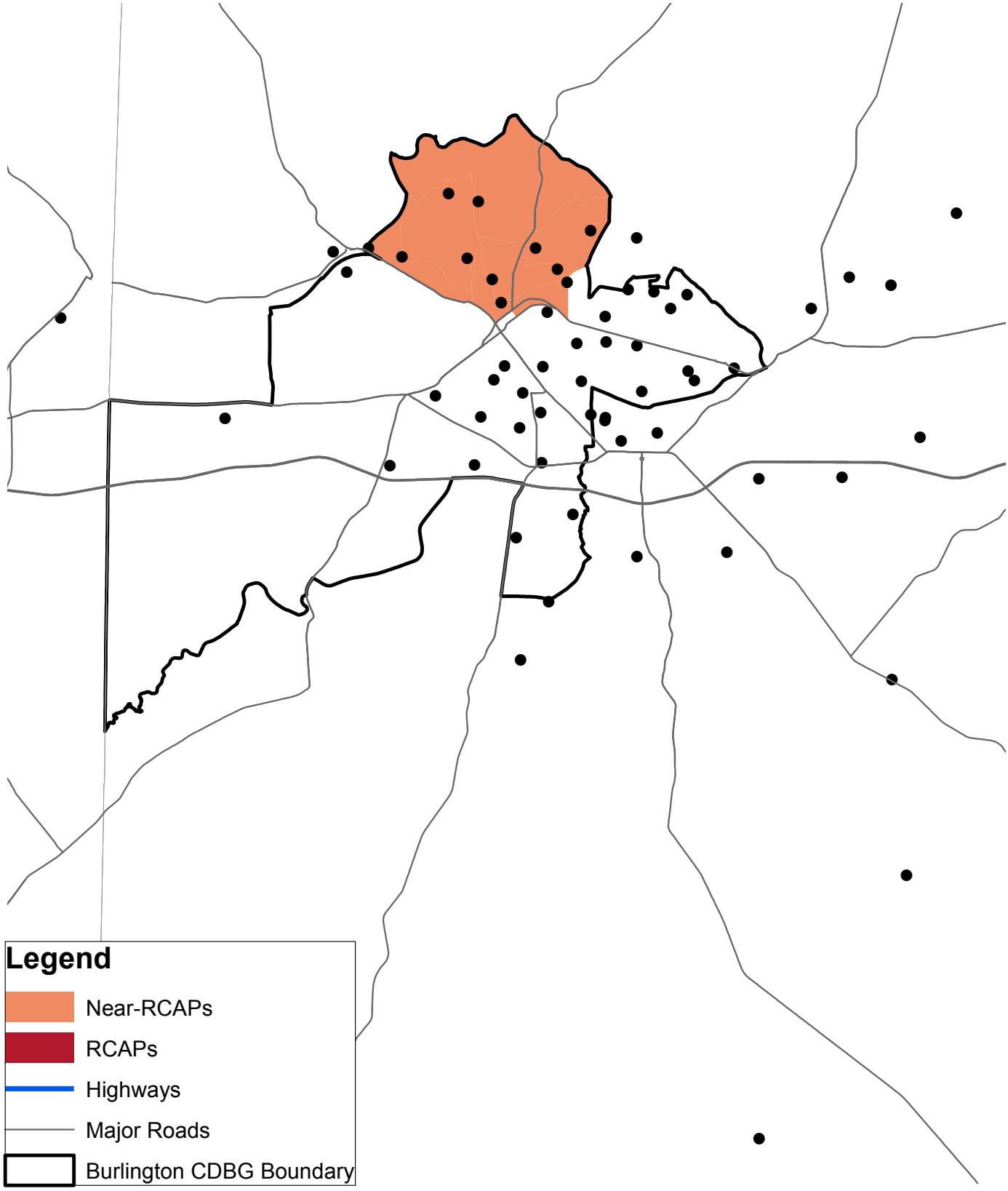
Figure 11 : Local Dissimilarity Indices, 1980-2010

		1980	1990	2000	2010	Trend
Burlington	White and Black	0.59	0.45	0.48	0.42	*Decreasing*
	White and Hispanic*	0.31	0.15	0.41	0.48	*Increasing*
	White and Asian	0.33	0.17	0.26	0.24	*Decreasing*
Greensboro	White and Black	0.71	0.60	0.57	0.57	*Decreasing*
	White and Hispanic*	0.33	0.22	0.46	0.49	*Increasing*
	White and Asian	0.29	0.27	0.35	0.36	*Increasing*
High Point	White and Black	0.64	0.58	0.47	0.46	*Decreasing*
	White and Hispanic*	0.37	0.20	0.47	0.39	*Increasing*
	White and Asian	0.39	0.19	0.35	0.34	*Decreasing*
Surry HOME Consortium	White and Black	0.53	0.33	0.34	0.41	*Decreasing*
	White and Hispanic*	0.52	0.27	0.22	0.25	*Decreasing*
	White and Asian	0.49	0.27	0.32	0.33	*Decreasing*

Source: American Community Survey, 1980-2010

*Hispanic ethnicity is calculated independently of race

MAP 10:
RACIALLY CONCENTRATED AREAS OF POVERTY IN BURLINGTON



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 0.5 1 2 Miles

Access to Opportunity

Members of the protected classes often have inferior access to opportunity, and are concentrated in the lowest-opportunity areas of Burlington

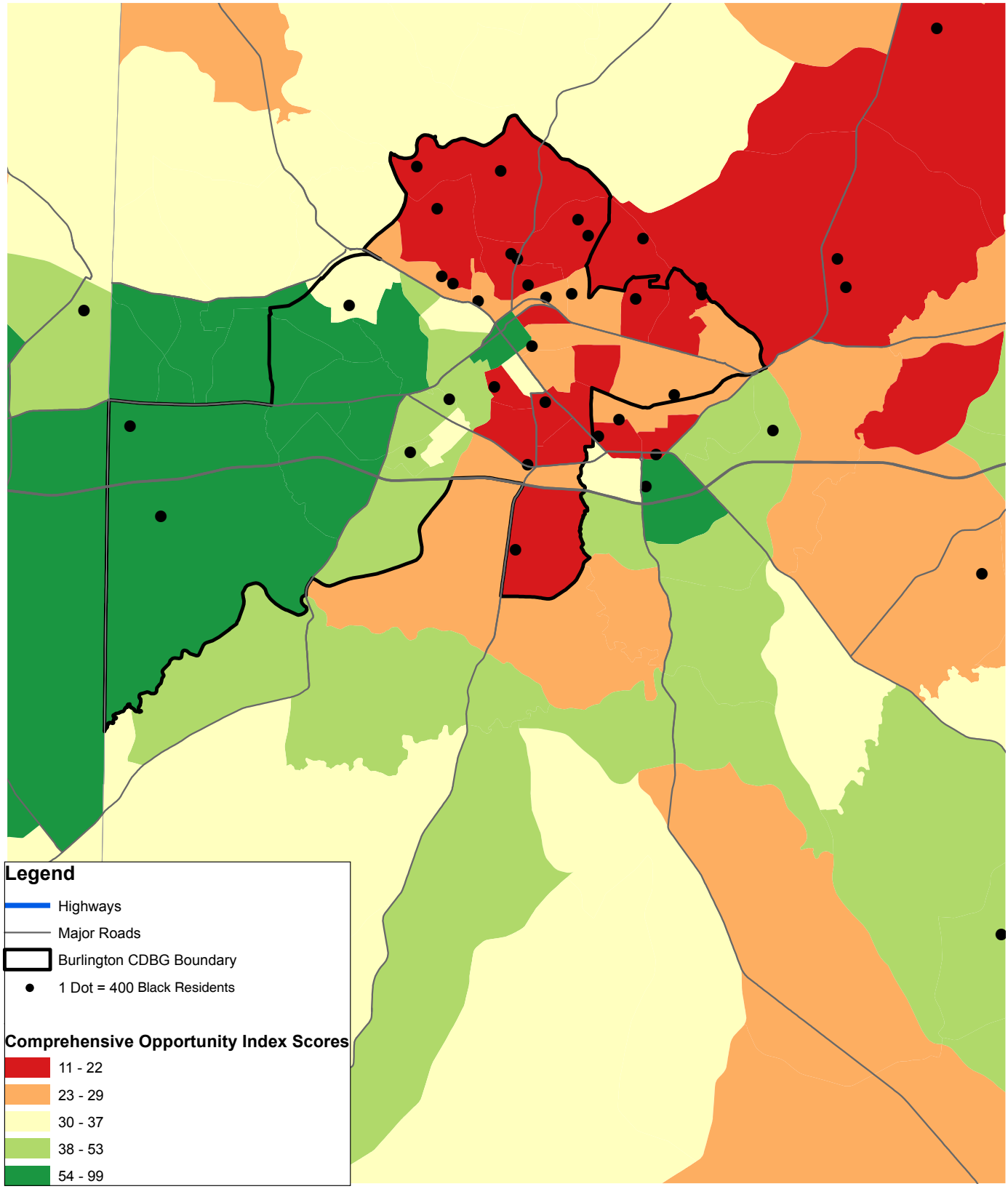
The distribution of opportunity in the region is also uneven, typically in a way that isolates low-income and minority populations from jobs, amenities, and suburban housing opportunities. In Burlington and the surrounding area in Alamance County, this is the case. Utilizing a technique known as opportunity mapping, the geographic footprint of opportunity and inequality can be quantified and projected onto maps. The resulting maps allow communities such as Burlington to analyze opportunity at the local level as well as place their situation into a regional context. Key variables were analyzed, and Burlington's score relative to the region include the following:

- Neighborhood School Proficiency: below average
- Labor Market Engagement: below average
- Prosperity: below average
- Job Access: above average
- Environmental Health Hazard Exposure: above average
- Transit Access: above average

The composite score for Burlington, which weighs each variable equally to estimate overall opportunity, was 29.6 points. This is very close to the regional average of 29.8 points. Opportunity is lower in Burlington than in Greensboro, but higher than in High Point and the four-county Surry HOME Consortium. Within Burlington, the highest-scoring areas were concentrated in the western neighborhoods of the city and in the suburbs in western Alamance County and Guilford County. The lowest-scoring areas were in northern and eastern Burlington. These are the same neighborhoods where high levels of poverty and minority concentration exist.

The following maps illustrate the location of Black and Hispanic residents against the backdrop of opportunity areas. Areas with low opportunity scores are shown in red, while areas with high opportunity scores are shown in green. Moderate opportunity areas are shown in the intermediate colors. The levels of opportunity in Burlington very clearly take an east-west polarization. Black and Hispanic residents of Burlington are clustered in low-opportunity areas, which contain inferior access to basic amenities and resources for upward mobility.

MAP 11:
BLACK POPULATION AND AREAS OF OPPORTUNITY IN BURLINGTON

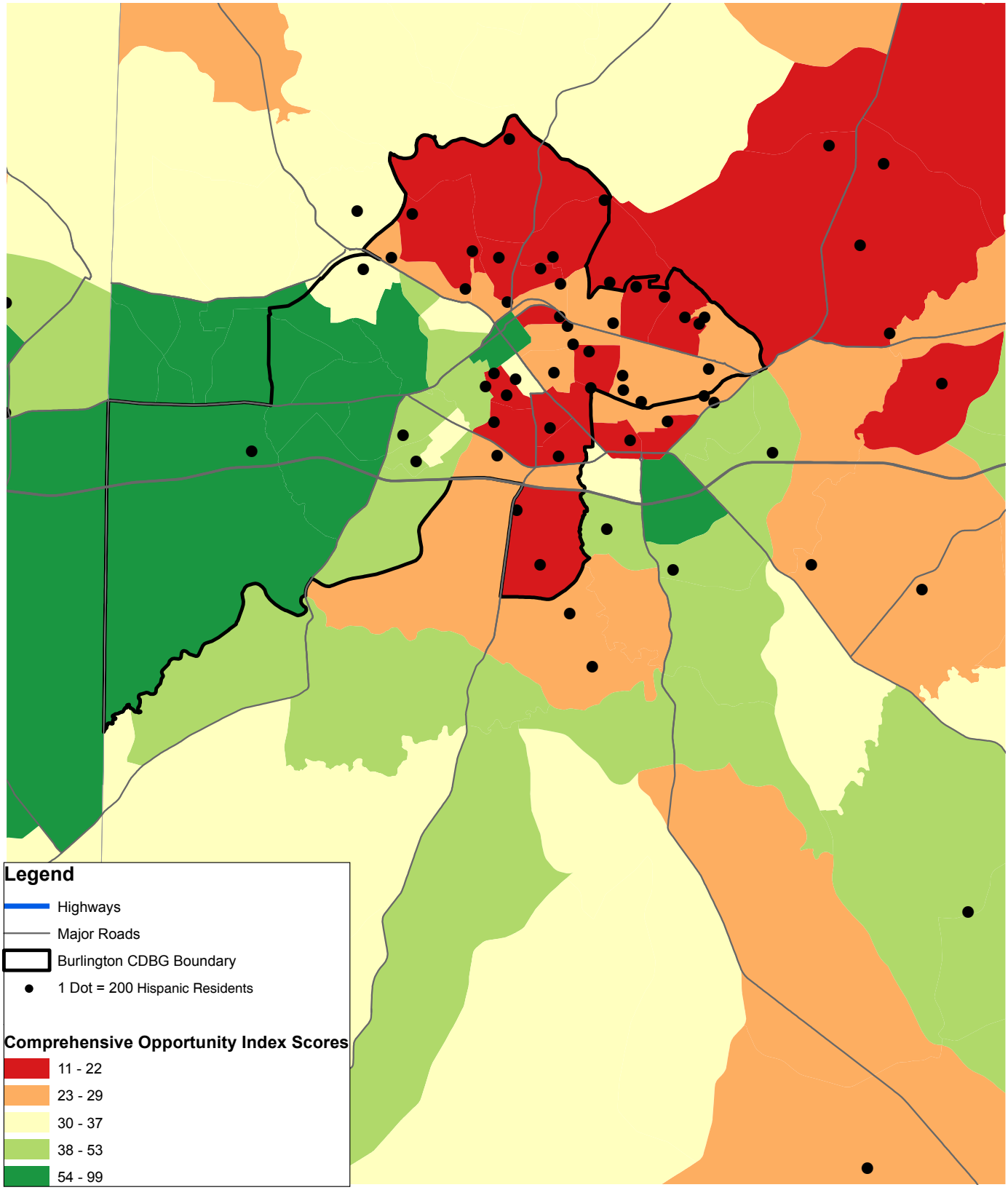


Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 0.5 1 2 Miles

MAP 12:
HISPANIC POPULATION AND AREAS OF OPPORTUNITY IN BURLINGTON



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 0.5 1 2 Miles

Key Housing Trends

Burlington's supply of housing that is affordable to lower-income residents is shrinking as demand rises

Housing issues are a major underlying cause of unequal access to opportunity, in both the Piedmont Triad region and in the City of Burlington. Despite stagnant or declining real incomes in the region, the supply of affordably-priced housing units has shrunk. This has resulted in cost burden (spending over 30% of one's income on housing), overcrowding, and a lack of affordable housing options in higher opportunity areas. These housing issues disproportionately affect members of the protected classes, who also tend to have lower incomes and larger households.

There is a lack of housing that is affordable to lower-income residents in higher opportunity areas, and members of the protected classes face severe housing challenges

Between 2000 and 2010, real income in Burlington decreased from $49,362 to $43,980, a loss of 5.2%. However, the median housing value in Burlington increased 4.4%, from $121,644 to $124,600. Median rent also increased from $687 to $707, an increase of 2.9%. Households in Burlington must spend more money on housing, but are making less of it. While this is a serious problem, it is actually least severe in Burlington compared to the rest of the Piedmont Triad. Incomes in Burlington declined less than in Greensboro, High Point, the Surry HOME Consortium, and the Piedmont Triad region as a whole. Housing costs and rents also appreciated the least, with the exception of rents in Greensboro, which fell 4.4% from 2000 to 2010.

At the same time, market-rate housing is disproportionately filling high-end rental demand rather than addressing the demand for housing that is affordable to lower-income residents. From 2000 to 2010, the number of units in Burlington renting below $500 decreased 45.8%, and the number of units renting from $500 to $699 decreased 1.8%. Conversely, the number of units renting for $1,000 or more increased 896%. Even accounting for inflation, this represents significant shifts in Burlington's market-rate housing inventory. This issue is more severe in Burlington than in the Piedmont Triad region.

The table below shows the distribution of housing costs for rental units within Burlington.

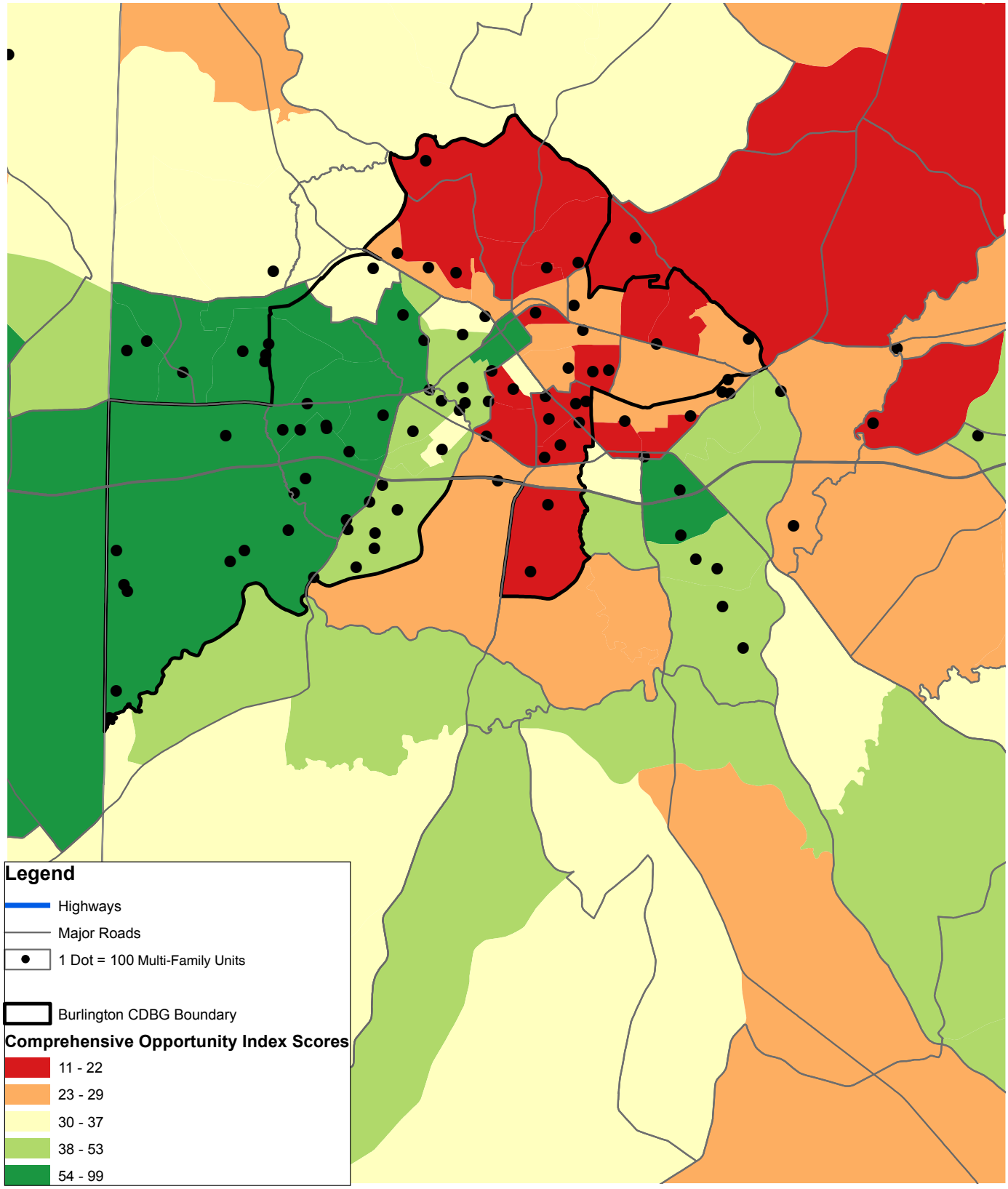
On the following map, each dot represents 50 multi-family housing units, which serves as a rough proxy for affordability. Unlike many of the other urban areas in the Piedmont Triad, Burlington has a fair number of multi-family housing units in higher opportunity areas.

Figure 12 : Change in Affordable Rental Housing, 2000-2010

			Change	
Units Renting for:	**2000**	**2010**	**#**	**%**
Region				
Less than $500	72,682	41,995	-30,687	-42.2%
$500 to $699	56,643	64,132	7,489	13.2%
$700 to $999	26,701	57,151	30,450	114.0%
$1000 or More	6,223	22,384	16,161	259.7%
Burlington				
Less than $500	2,729	1,480	-1,249	-45.8%
$500 to $699	2,718	2,670	-48	-1.8%
$700 to $999	1,495	3,152	1,657	110.8%
$1000 or More	119	1,186	1,067	896.6%

Source: U.S. Census Bureau, Census 2000 (H062) and 2006-2010 American Community Survey (B25063)

MAP 13:
MULTI-FAMILY UNITS AND AREAS OF OPPORTUNITY IN BURLINGTON



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 0.5 1 2 Miles

For households wanting to invest in buying a home rather than renting, minority household incomes tend to be too low to achieve homeownership. In Burlington, the median household income for Whites was $47,291, $26,787 for Blacks, and $38,848 for Hispanics. The maximum purchase price a household making the median income for a White household could pay is approximately $118,000. A household making the median income for a Black household could pay approximately $38,000, and a household making the median income for a Hispanic household could pay approximately $105,000. At these thresholds, only the average median income of Burlington's White households is high enough to buy a house in Burlington priced at the median value.

The maximum purchase price for Blacks in Burlington is extremely low—the lowest out of any study areas in the Piedmont Triad—and there are likely very few homes in Burlington priced at $38,000 and under. This lack of affordable housing will force households into renting, becoming cost burdened, living in overcrowded or substandard conditions, or a combination of these factors. Minorities also face lower rates of mortgage approval in the area: the approval rate in the Piedmont Triad was 65.4% for Whites but only 48.4% for Blacks and 51.4% for Hispanics.

Figure 13 : Maximum Affordable Purchase Price, 2010

		Monthly Mortgage Payment				
	Household Income	Principal and Interest	Real Estate Taxes	Homeowner's Insurance and PMI	Total Debt Service*	Maximum Affordable Purchase Price
Region	**$43,970**	**$595**	**$111**	**$80**	**$1,286**	**$133,000**
Whites	$49,269	$720	$134	$80	$1,434	$161,000
Blacks	$31,318	$280	$52	$80	$912	$62,500
Asians	$48,850	$712	$133	$80	$1,425	$159,000
Hispanics	$31,556	$286	$53	$80	$919	$64,000
Burlington	**$41,482**	**$528**	**$98**	**$80**	**$1,206**	**$118,000**
Whites	$47,291	$676	$126	$80	$1,382	$151,000
Blacks	$26,787	$170	$32	$80	$782	$38,000
Asians	$56,514	$904	$168	$80	$1,652	$202,000
Hispanics	$38,848	$470	$88	$80	$1,138	$105,000

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25077, B25103, S1903)

Impediments to Fair Housing Choice

Burlington faces several policy-related impediments that either directly or indirectly limit fair housing choice

- The zoning ordinance limits the number of unrelated people who may live together to two and restricts mobile homes to a dedicated district.
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- The absence of a Language Access Plan detailing the city's protocol for ensuring access to city services and programs to potential beneficiaries with limited English proficiency (LEP)
- The absence of a public transportation system connecting Near-RCAP and other low- and moderate-income neighborhoods with employment opportunities and other community assets
- The absence of a lawfully organized and politically-neutral human rights commission to provide fair housing education, outreach and enforcement of fair housing laws
- The concentration of poverty in East and North Burlington, along with growing minority populations, calls for intervention to avoid those neighborhoods becoming RCAPs
- The concentration of assisted housing in Near-RCAP and other low- and moderate-income census tracts

Fair Housing Priorities

Burlington can take action to address important fair housing priorities

The demographic analysis, opportunity mapping, and housing market analysis found racially concentrated areas of poverty (or areas approaching these criteria), significant disparities in access to opportunity, and a disproportionate housing need based on protected class status. Factors contributing to these issues in Burlington are:

1. A need for expanded public transportation to provide RCAP residents and other lower income residents with access to higher opportunity areas and community assets

The need for expanded public transportation service was given the highest priority because it can be implemented incrementally and beginning within a potentially shorter time frame. The extension of public transit routes and expansion of service hours will require capital investment over time.

2. A need for greater affordable and accessible housing opportunities, both rental and sales units, in higher opportunity areas

The need for greater affordable and accessible housing opportunities in higher opportunity areas may require less public financing than expanded public transportation, but it will require a well-designed public education campaign against residential opposition to the development of affordable housing in some areas. This initiative will require time and the investment of significant human resources in the form of political and community leadership to play key roles in any campaign.

3. A need for sustainable employment opportunities within, or in closer proximity to, racially concentrated areas of poverty

The need for sustainable employment opportunities in or close to RCAPs and near-RCAPs will require significant capital investment and time, including planning for potential revitalization, redevelopment and re-use of land and structures that are appropriate for new commercial and industrial uses.

These three priorities have the potential for mitigating each of the determinants of fair housing outlined in the AFH. All three priorities will require financial investments, strong political leadership, substantial changes to long-standing public policies, long-term public education, and lengthy implementation periods. However, none of these challenges should be used as reasons to dismiss the possibility of implementation of any one priority and the potential for cataclysmic change at the local and regional levels.

One of the most pragmatic ways to address these goals is through overcoming policy barriers. Burlington's zoning ordinance was reviewed and benchmarked to uncover and systematically score its effectiveness in affirmatively furthering fair housing and minimizing discriminatory practices. On a rating of 1 to 2, with 1 being the lowest possible risk for potentially discriminatory provisions and 2 being the highest, Burlington scored a 1.36. This puts Burlington's ordinance at a moderate risk relative to discriminatory provisions for housing and members of the protected classes.

There is a lack of capacity to address fair housing issues in Burlington. Neither the City of Burlington nor Alamance County currently has a human rights or fair housing ordinance in place. Multiple stakeholders interviewed in Burlington cited City Council's lack of understanding of fair housing as a barrier to fair housing policy. Furthermore, there is no longer a publicly funded fair housing organization in Burlington or Alamance County. The Alamance County Human Relations Council (ACHRC) enforces fair housing regulations at the County level; however, the Council formally split from the Alamance County Commission in February of 2014. Stakeholder interviews and secondary research revealed that the reasons for the split were largely political, despite the ACHRC being a non-partisan organization. The ACHRC has a very good relationship with the local Legal Aid office, and recently worked with the organization to co-sponsor two workshops on fair housing with a total of 50 residents attending.

The City of Burlington does not currently have a Language Access Plan, a key component of outreach to non-English speaking residents. While this is not a requirement due to the low level of limited-English proficiency residents, the City must have a policy to address how it will ensure access to its programs and services by persons with limited English proficiency.

A Local Fair Housing Action Plan: Goals and Strategies for Burlington

The goals and strategies established in this section are tailored to Burlington for inclusion in its Five-Year Consolidated Planning process.

Goal 1: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Establish a public transportation system that links low income neighborhoods with higher-opportunity areas, jobs, and other community assets

Goal 2: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Invest the City's HOME funding allocation to provide incentive for the development of affordable rental housing in higher opportunity areas

Strategy 2: Provide market-based density bonuses and other incentives to encourage mixed-income residential developments

Strategy 3: Amend the zoning ordinance to permit single-room occupancy (SRO) or micro-units as an affordable housing option for single persons, regardless of income

Strategy 4: Update the 2000 Comprehensive Plan to incorporate the designation of developable parcels along major corridors and near existing/emerging employment centers as appropriate for multi-family housing

Strategy 5: Partner with Graham Housing Authority to reach out to private landlords in higher opportunity areas to accept Section 8 Housing Choice Vouchers

Goal 3: **Expand access to HUD programs**

Strategy 1: Adopt a Language Access Plan to ensure persons with limited English proficiency (LEP) can access the City's HUD programs and services

Goal 4: **Increase the awareness of fair housing education and outreach among all residents**

Strategy 1: Make available education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and city boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Seek out immigrant populations with limited English proficiency for fair housing education

Goal 5: **Improve the physical environment in lower income neighborhoods**

Strategy 1: Target dwelling units cited for code violations for inclusion in the City's housing rehabilitation program

Strategy 2: Continue the City's housing rehabilitation program to maintain and preserve the affordable housing stock in older neighborhoods

Strategy 3: Develop an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing that is within walking distance from downtown

Strategy 4: Provide for homeowner / homebuyer / financial counseling for lower income households, minority households and households with limited English proficiency (LEP) for the purpose of educating owners and buyers on predatory lending, high-cost lending and financial management

Strategy 5: Give preference to providing CDBG assistance for public facilities and infrastructure in near-RCAP areas

For More Information:

Shawna Tillery, City of Burlington
stillery@ci.burlington.nc.us

Bill McNeil, Piedmont Triad Regional Council
mcneilplanning@gmail.com

ANALYSIS OF IMPEDIMENTS AND ASSESSMENT OF FAIR HOUSING SUMMARY: SURRY HOME CONSORTIUM

About the Regional Assessment of Fair Housing

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Also covered by this AFH are the non-entitlement areas within the Triad, which are eligible to apply for HUD funding from the North Carolina Small Cities Community Development Block Grant Program. The non-entitled areas include 67 municipalities and 12 counties within the Triad.

The development of the AFH follows the completion of the Regional Fair Housing & Equity Assessment (FHEA) prepared for the Triad by Sills Consulting, LLC. The AFH picks up where the FHEA ended and provides a more in-depth analysis of communities of opportunity as well as a series of determinants of fair housing, priority fair housing issues and a series of recommended strategies that, if implemented, would eliminate the impediments to fair housing choice. This study will also be used to guide and prioritize elements of the Consolidated Plan and Annual Action Plan implementation process for each of the four HUD entitlement jurisdictions.

The regional AFH provided the basis for the Surry County HOME Consortium Analysis of Impediments, which is summarized below and which was deisgned to meet the area's obligation under HUD rules to affirmatively further fair housing.

Top Findings in the Surry HOME Consortium Area

- ***The counties in the Surry HOME Consortium area are growing, but at a slower rate than the region as a whole. The Non-White population is growing much more rapidly than the White population, led primarily by a growing Hispanic population***
- ***Patterns of segregation persist in the Surry HOME Consortium area, but are less severe than in the Triad's major cities***
- ***Members of the protected classes may have inferior access to opportunity, and are more likely to live in the lowest-opportunity areas of the Consortium***
- ***The Surry HOME Consortium' area's supply of housing that is affordable to low-moderate income families is shrinking as demand rises***
- ***Both market forces and the rural nature of the four-county area limits the supply of affordable housing in higher opportunity areas, which disproportionately affects members of the protected classes***
- ***The Surry HOME Consortium area faces several policy-related impediments that either directly or indirectly limit fair housing choice***
- ***The Surry HOME Consortium area can take action to address important fair housing priorities***

Key Demographic Trends

The counties in the Surry HOME Consortium area are growing, but at a slower rate than the region as a whole. The Non-White population is growing much more rapidly than the White population, led primarily by a growing Hispanic population

The Surry HOME Consortium area has shown steady population growth, although the four-county area has grown at a slower rate than the Triad region. Only the City of Greensboro has grown faster than the Surry HOME Consortium area. The Consortium grew 69.2% from 1970 to 2012, compared to 87.2% growth in Greensboro, 31.1% in Burlington, 63.8% in the Piedmont Triad region, and 87.5% in North Carolina.

Like most of the region, the Surry HOME Consortium area is also becoming much more diverse. While the non-White population increased 4.5% from 2000 to 2010, the Hispanic population increased 62.4%, becoming the fastest-growing demographic by far. Unlike anywhere else in the Piedmont Triad, the Black population decreased 2.5%. Minority families in the four-county region tend to have larger families: 87.6% of Hispanic families had three or more members, compared to 50.8% for Whites. Because race and ethnicity are protected classes, this increases the importance of fair housing strategies that can accommodate the Consortium area's diversifying population in the future.

Figure 14 : Population Change, 2000-2010

	2000		2010		% Change
	#	%	#	%	
Region	**1,464,979**	**100.0%**	**1,640,717**	**100.0%**	**12.0%**
White	1,099,957	75.1%	1,146,900	69.9%	4.3%
Non-White	365,022	24.9%	493,817	30.1%	20.8%
Black or African American	288,080	19.7%	340,448	20.7%	18.2%
American Indian and Alaska Native	5,271	0.4%	7,970	0.5%	51.2%
Asian/Pacific Islander	18,461	1.3%	33,339	2.0%	80.6%
Some other race	35,867	2.4%	79,979	4.9%	123.0%
Two or more races	17,343	1.2%	32,081	2.0%	85.0%
Hispanic*	72,867	5.0%	142,829	8.7%	96.0%
Surry HOME Consortium	**187,113**	**100.0%**	**200,720**	**100.0%**	**7.3%**
White	171,299	91.5%	179,054	89.2%	4.5%
Non-White	15,814	8.5%	21,666	10.8%	27.7%
Black or African American	8,663	4.6%	8,450	4.2%	-2.5%
American Indian and Alaska Native	412	0.2%	603	0.3%	46.4%
Asian/Pacific Islander	724	0.4%	832	0.4%	14.9%
Some other race	4,367	2.3%	9,017	4.5%	106.5%
Two or more races	1,648	0.9%	2,764	1.4%	67.7%
Hispanic*	9,022	4.8%	14,654	7.3%	62.4%
Davie County	**34,835**	**100.0%**	**41,183**	**100.0%**	**18.2%**
White	31,504	90.4%	36,119	87.7%	14.6%
Non-White	4,547	13.1%	7,558	18.4%	66.2%
Black or African American	2,368	6.8%	2,811	6.8%	18.7%
American Indian and Alaska Native	79	0.2%	146	0.4%	84.8%
Asian/Pacific Islander	116	0.3%	202	0.5%	74.1%
Some other race	458	1.3%	1,552	3.8%	238.9%
Two or more races	310	0.9%	353	0.9%	13.9%
Hispanic*	1,209	3.5%	2,494	6.1%	106.3%
Stokes County	**44,711**	**100.0%**	**47,224**	**100.0%**	**5.6%**
White	41,774	93.4%	44,254	93.7%	5.9%
Non-White	3,796	8.5%	4,223	8.9%	11.2%
Black or African American	2,084	4.7%	2,000	4.2%	-4.0%
American Indian and Alaska Native	109	0.2%	289	0.6%	165.1%
Asian/Pacific Islander	109	0.2%	111	0.2%	1.8%
Some other race	393	0.9%	198	0.4%	-49.6%
Two or more races	242	0.5%	372	0.8%	53.7%
Hispanic*	836	1.9%	1,253	2.7%	49.9%
Surry County	**71,219**	**100.0%**	**73,551**	**100.0%**	**3.3%**
White	64,383	90.4%	67,694	92.0%	5.1%
Non-White	11,483	16.1%	12,972	17.6%	13.0%
Black or African American	2,965	4.2%	2,871	3.9%	-3.2%
American Indian and Alaska Native	165	0.2%	338	0.5%	104.8%
Asian/Pacific Islander	430	0.6%	274	0.4%	-36.3%
Some other race	2,459	3.5%	1,221	1.7%	-50.3%
Two or more races	817	1.1%	1,153	1.6%	41.1%
Hispanic*	4,620	6.5%	7,115	9.7%	54.0%
Yadkin County	**36,348**	**100.0%**	**38,254**	**100.0%**	**5.2%**
White	33,638	92.5%	34,590	90.4%	2.8%
Non-White	5,074	14.0%	7,409	19.4%	46.0%
Black or African American	1,246	3.4%	1,314	3.4%	5.5%
American Indian and Alaska Native	59	0.2%	85	0.2%	44.1%
Asian/Pacific Islander	69	0.2%	21	0.1%	-69.6%
Some other race	1,057	2.9%	1,790	4.7%	69.3%
Two or more races	279	0.8%	454	1.2%	62.7%
Hispanic*	2,357	6.5%	3,745	9.8%	58.9%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

Patterns of segregation persist in the Surry HOME Consortium area, but are less severe than in the Triad region's major cities

Diversification has not resulted in integration, and the Consortium still experiences moderate levels of racial and ethnic segregation. This was determined by using the dissimilarity index, a statistical analysis that calculates how disproportionately distributed certain populations are distributed throughout an area. Within the Consortium, White/Black, White/Hispanic, and White/Asian segregation have all decreased over the last 30 years, meaning that these races are becoming more integrated. This is the only jurisdiction in this study where segregation is decreasing "across the board" among all racial and ethnic groups. It is the least segregated overall out of all four study areas. Whites and Blacks have historically been and still remain the most segregated two racial groups in the Surry HOME Consortium area. While the trend is towards desegregation in the long term, dissimilarity increased in all three categories between 2000 and 2010.

High rates of minority concentration exist in the Consortium area. The Consortium area has three such areas of Hispanic concentration at least 10% above the regional average, located 1) in Surry County generally between Dobson and White Plains, 2) northwest of Elkin, and 3) in Yadkin County west of Yadkinville. One area in Stokes County near Belews Lake has a Black concentration at least 10% above the regional average.

However, there are no block groups in the Surry HOME Consortium area where the poverty rate is at least 10% above the regional average. This suggests that while Black and Hispanic residents are occasionally concentrated, the concentrations of poverty in the Surry HOME Consortium area are less severe.

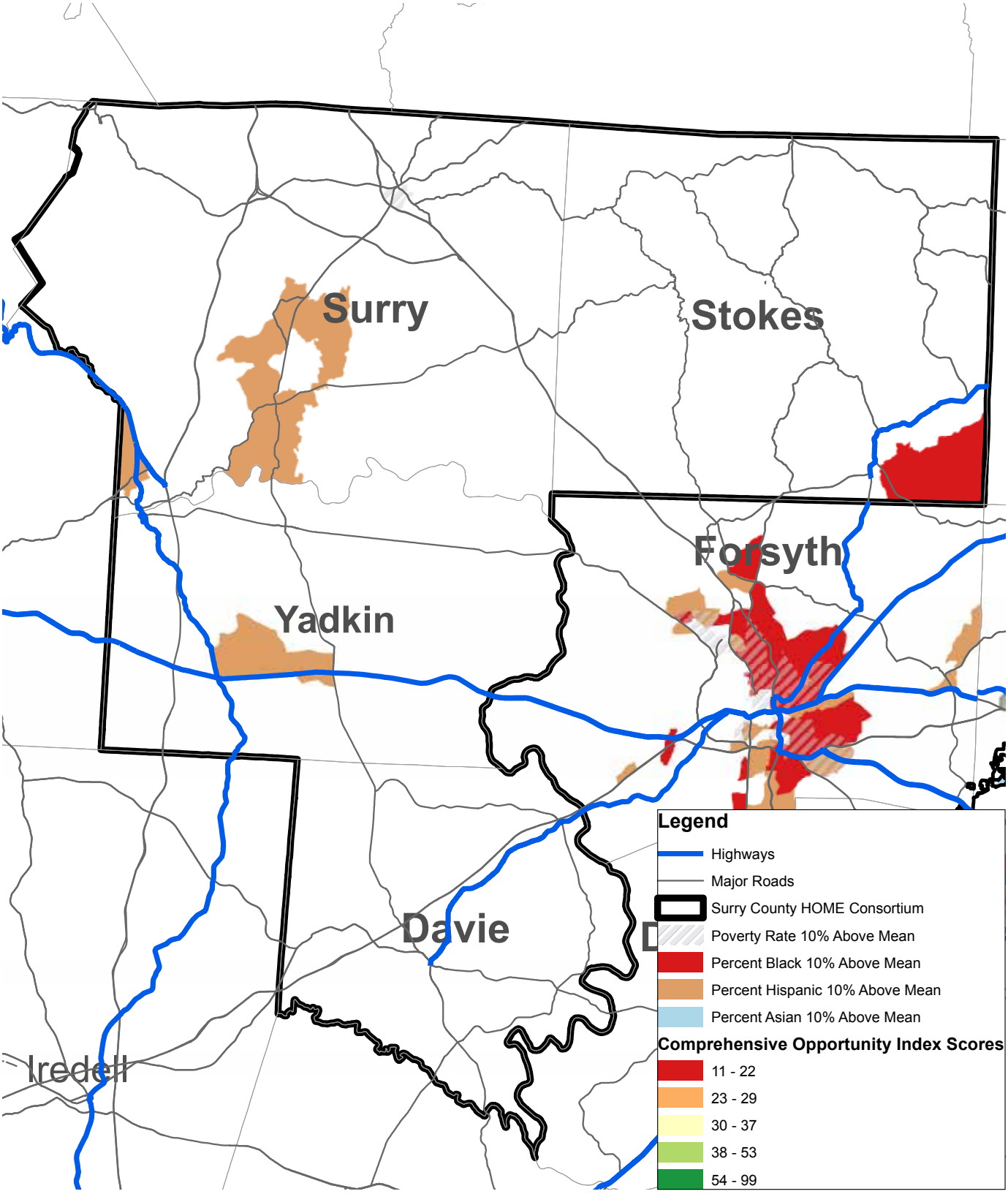
Figure 15 : Local Dissimilarity Indices, 1980-2010

		1980	1990	2000	2010	Trend
Burlington	White and Black	0.59	0.45	0.48	0.42	*Decreasing*
	White and Hispanic*	0.31	0.15	0.41	0.48	*Increasing*
	White and Asian	0.33	0.17	0.26	0.24	*Decreasing*
Greensboro	White and Black	0.71	0.60	0.57	0.57	*Decreasing*
	White and Hispanic*	0.33	0.22	0.46	0.49	*Increasing*
	White and Asian	0.29	0.27	0.35	0.36	*Increasing*
High Point	White and Black	0.64	0.58	0.47	0.46	*Decreasing*
	White and Hispanic*	0.37	0.20	0.47	0.39	*Increasing*
	White and Asian	0.39	0.19	0.35	0.34	*Decreasing*
Surry HOME Consortium	White and Black	0.53	0.33	0.34	0.41	*Decreasing*
	White and Hispanic*	0.52	0.27	0.22	0.25	*Decreasing*
	White and Asian	0.49	0.27	0.32	0.33	*Decreasing*

Source: American Community Survey, 1980-2010

*Hispanic ethnicity is calculated independently of race

MAP 14:
RACIALLY CONCENTRATED AREAS OF POVERTY IN THE SURRY HOME CONSORTIUM



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

The following map displays the areas of racial and ethnic concentration within the Consortium's four counties and surrounding areas, with orange signifying areas where the Hispanic concentration is over 10% higher than the regional average and red signifying areas where the Black concentration is over 10% higher than the regional average:

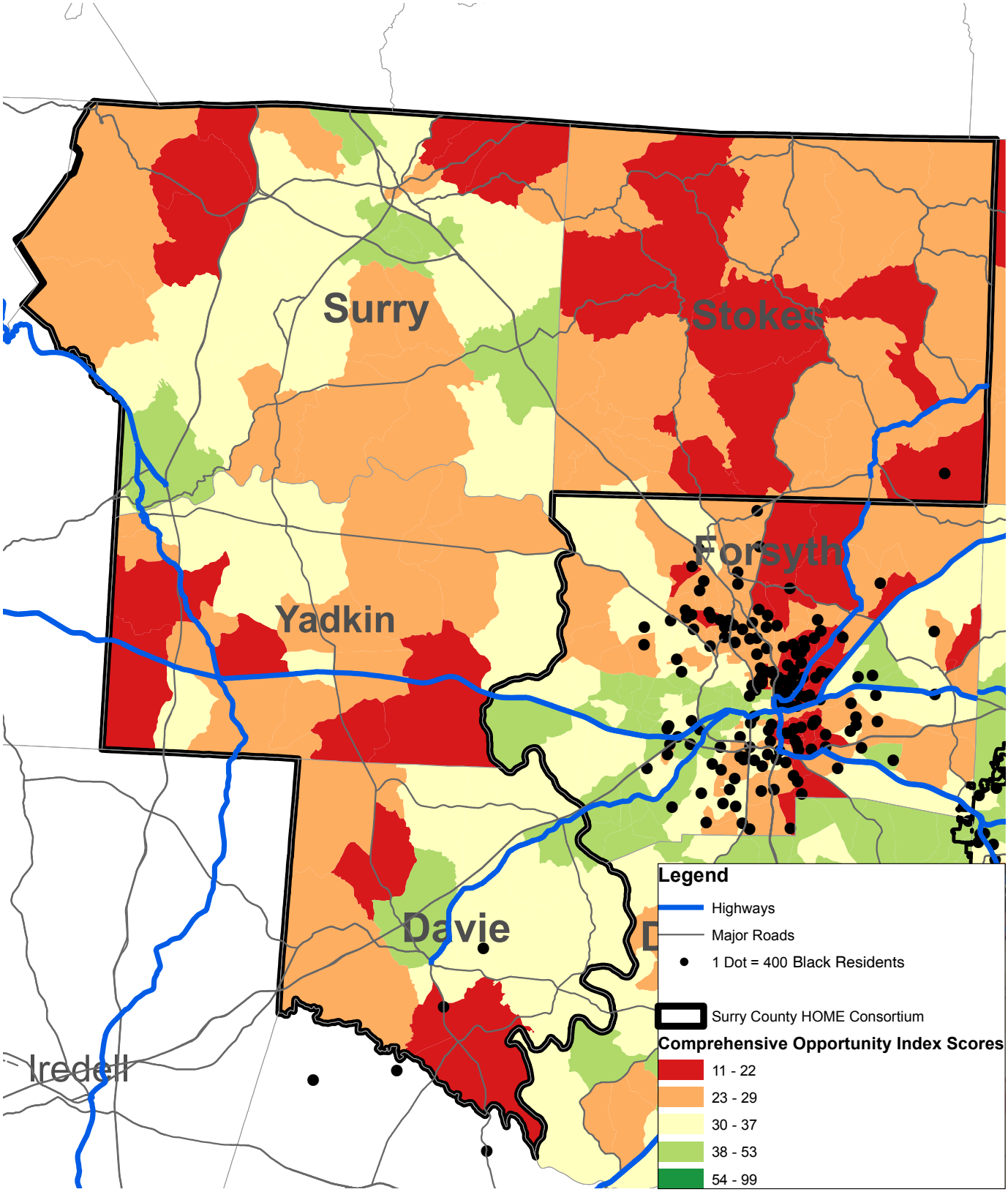
Access to Opportunity

Members of the protected classes may have inferior access to opportunity, and are more likely to live in the lowest-opportunity areas of the Consortium area

The distribution of opportunity in the region is also uneven, typically in a way that isolates low-income and minority populations from jobs, amenities, and suburban housing opportunities. Utilizing a technique known as opportunity mapping, the geographic footprint of opportunity and inequality can be quantified and projected onto maps. The resulting maps allow communities such as the Consortium area's four-county region to analyze opportunity at the local level as well as place their situation into a regional context. Key variables were analyzed, and the Consortium area's score relative to the region include the following:

- Neighborhood School Proficiency: above average
- Labor Market Engagement: below average
- Prosperity: above average
- Job Access: below average
- Environmental Health Hazard Exposure: above average
- Transit Access: below average

MAP 15:
BLACK POPULATION AND AREAS OF OPPORTUNITY IN THE SURRY HOME CONSORTIUM



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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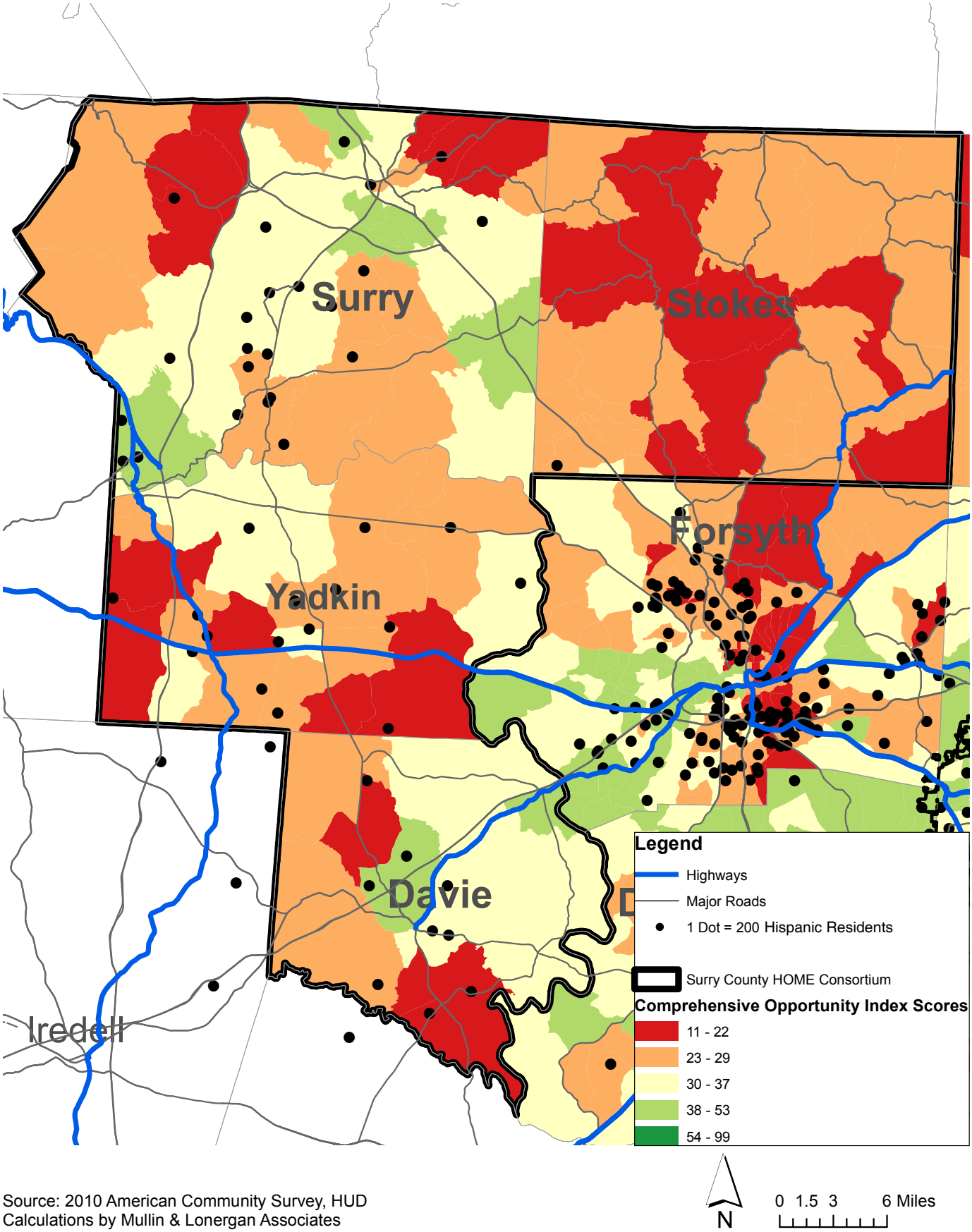
0 1.5 3 6 Miles

MAP 16:
HISPANIC POPULATION AND AREAS OF OPPORTUNITY IN THE SURRY HOME CONSORTIUM



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

The composite score for the Surry HOME Consortium area, which weighs each variable equally to estimate overall opportunity, was 29.4 points. This is very close to the regional average of 29.8 points. Opportunity is lower in the Consortium area than in Greensboro and Burlington, but higher than in High Point. Within the Consortium area, the highest-scoring areas were the more developed communities of Surry, Yadkin, and in Davie County the communities of Mt. Airy, Pilot Mountain, Elkin, and Mocksville. The lowest-scoring areas were in rural areas with limited job access or local labor markets, such as rural Stokes County, Yadkin County, and Davie County.

The following maps illustrate the location of Black and Hispanic residents against the backdrop of opportunity areas. Areas with low opportunity scores are shown red, while areas with high opportunity scores are shown in green. Moderate opportunity areas are shown in the intermediate colors. The levels of opportunity in the Consortium area very clearly take a north-south polarization. While there are very few Black and Hispanic residents within the Consortium area, this population tends to live in lower opportunity areas with lower levels of basic amenities and resources for upward mobility. There are very few minorities living in the highest-scoring areas in the Surry HOME Consortium area.

Key Housing Trends

The Surry HOME Consortium area's supply of housing that is affordable to low-moderate income families is shrinking as demand rises

Housing issues are a major underlying cause of unequal access to opportunity, in both the Piedmont Triad region overall and within the Surry HOME Consortium area. Despite stagnant or declining real incomes in the region, the supply of affordably-priced housing units has shrunk. This has resulted in cost burden (spending over 30% of one's income on housing), overcrowding, and a lack of affordable housing options in high-opportunity areas. These housing issues disproportionately affect members of the protected classes, who also tend to have lower incomes and larger households.

Both market forces and the rural nature of the four-county area limits the supply of affordable housing in higher opportunity areas, which disproportionately affects members of the protected classes

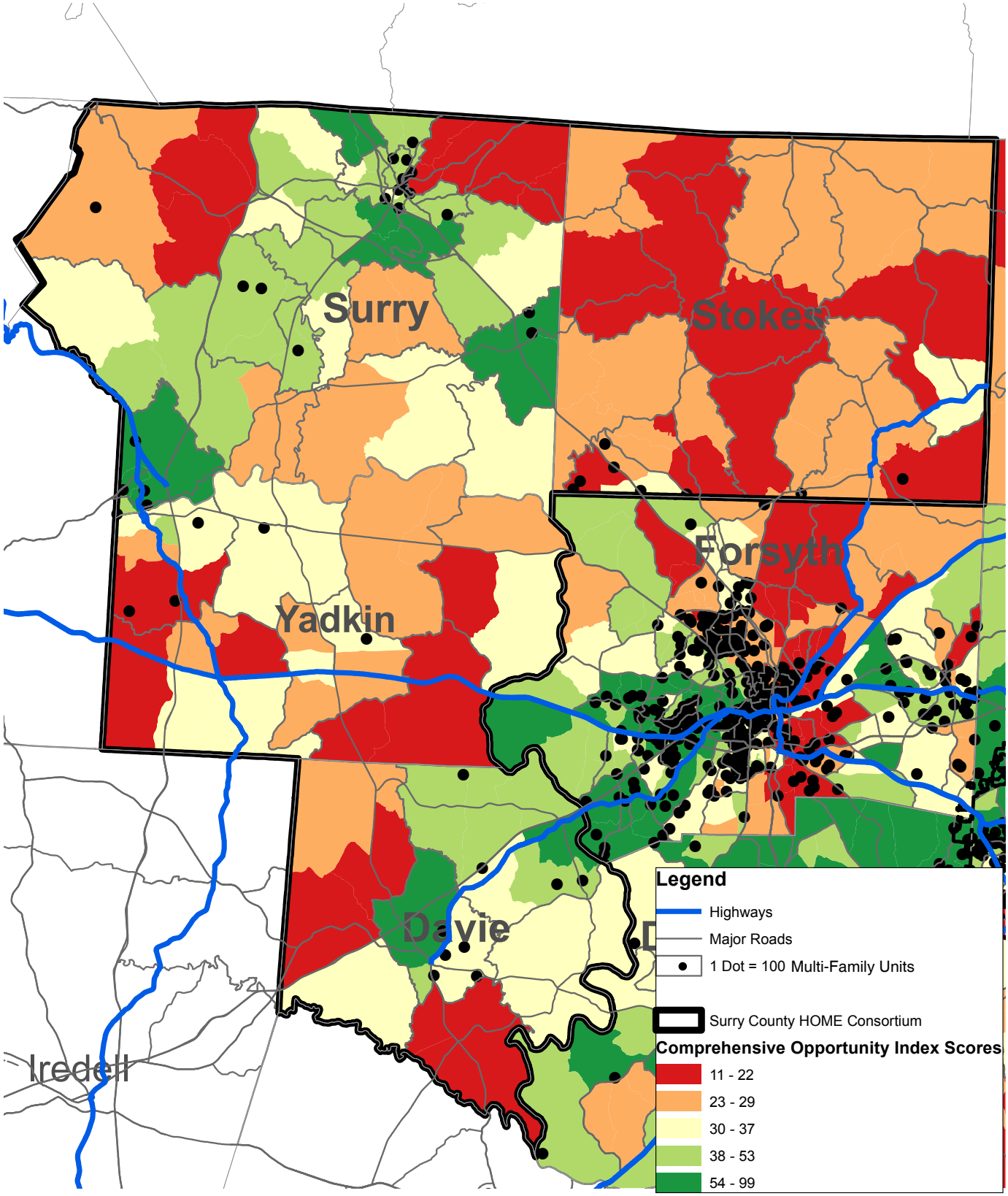
Between 2000 and 2010, real income in the Surry HOME Consortium area decreased from $45,181 to $41,558, a loss of 8%. However, the median house value increased 1.7%, from $118,316 to $120,351. Median rent also increased from $541 to $553, an increase of 2.2%. Households in the Consortium must spend more money on housing, but are making less. While incomes throughout the Piedmont Triad declined between 2000 and 2010, incomes among Consortium households declined more severely than the average. However, median housing costs and median rents increased at a rate lower than the regional average.

Figure 16 : Change in Affordable Rental Housing, 2000-2010

			Change	
Units Renting for:	**2000**	**2010**	**#**	**%**
Region				
Less than $500	72,682	41,995	-30,687	-42.2%
$500 to $699	56,643	64,132	7,489	13.2%
$700 to $999	26,701	57,151	30,450	114.0%
$1000 or More	6,223	22,384	16,161	259.7%
Surry HOME Consortium				
Less than $500	8,255	5,788	-2,467	-29.9%
$500 to $699	2,975	5,029	2,054	69.0%
$700 to $999	759	2,751	1,992	262.5%
$1000 or More	236	934	698	295.8%

Source: U.S. Census Bureau, Census 2000 (H062) and 2006-2010 American Community Survey (B25063)

MAP 17:
MULTI-FAMILY UNITS AND AREAS OF OPPORTUNITY IN THE SURRY HOME CONSORTIUM



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

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0 1.5 3 6 Miles

At the same time, market-rate housing is disproportionately filling high-end rental demand rather than addressing the demand for affordable housing. From 2000 to 2010, the number of units in the Consortium renting below $500 decreased 29.9%. Conversely, the number of units renting for $1,000 or more increased 295.8%. Even accounting for inflation, this represents significant shifts in the Surry HOME Consortium area's market-rate housing inventory. Combined with the lack of utilities such as water, and sewer access in much of the area due to its rural nature, affordable housing becomes relatively more expensive to develop due to the increased construction and infrastructure costs.

The table below shows the distribution of housing costs for rental units within the Surry HOME Consortium area, in comparison to other areas in the Piedmont Triad.

On the following map, each dot represents 50 multi-family housing units, which serves as a rough proxy for affordability. Unlike many of the other areas in the Piedmont Triad, the Consortium area's multi-family units are concentrated in areas of moderate opportunity rather than in areas of low opportunity. This may be because the rural nature of the area means factors such as water and sewer access at the scale to support multi-family housing is more important than opportunity. However, there are very few multi-family housing units in the areas of the Surry HOME Consortium area with higher levels of opportunity.

For Section 8 Housing Choice voucher holders, finding housing in a higher opportunity area may be difficult and pose a concern from a fair housing perspective. Mapping the locations of Section 8 vouchers reveals that voucher holders are relatively less concentrated in low opportunity areas than they are in High Point by comparison, but are still slightly disproportionately concentrated in low opportunity areas. The largest clusters of voucher holders are in a low opportunity area of Davie County and in the moderate-to-high opportunity areas in and around Mt. Airy in Surry County. There are also many Section 8 voucher holders scattered in the rural areas of the Consortium area across the spectrum of opportunity levels.

The following map plots the locations of Section 8 voucher holders against the composite opportunity scores in the Consortium area.

Figure 17 : Maximum Affordable Purchase Price, 2010

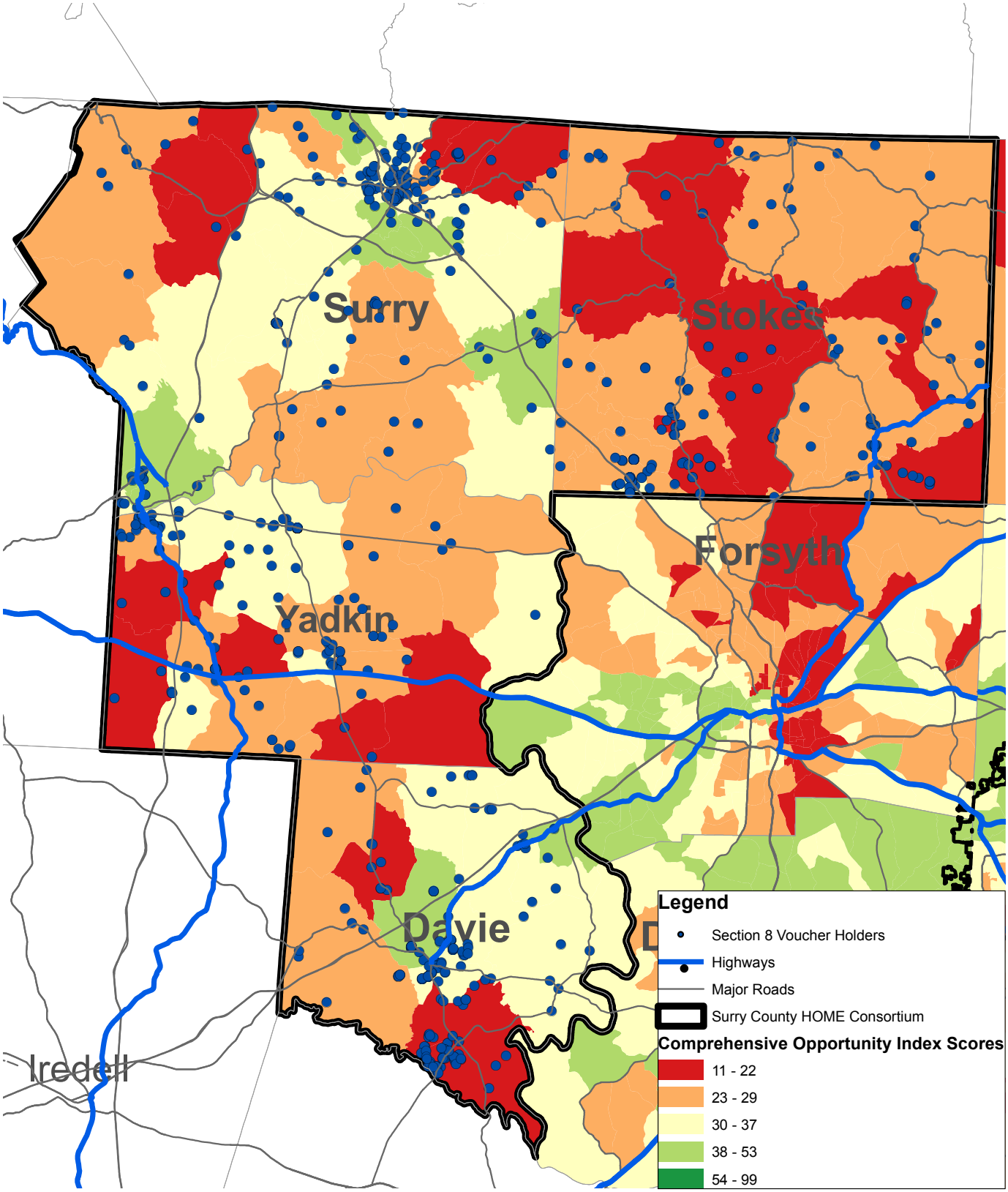
		Monthly Mortgage Payment				
	Household Income	Principal and Interest	Real Estate Taxes	Homeowner's Insurance and PMI	Total Debt Service*	Maximum Affordable Purchase Price
Region	**$43,970**	**$595**	**$111**	**$80**	**$1,286**	**$133,000**
Whites	$49,269	$720	$134	$80	$1,434	$161,000
Blacks	$31,318	$280	$52	$80	$912	$62,500
Asians	$48,850	$712	$133	$80	$1,425	$159,000
Hispanics	$31,556	$286	$53	$80	$919	$64,000
SHC	**$41,532**	**$537**	**$100**	**$80**	**$1,217**	**$120,000**
Whites	$42,874	$564	$105	$80	$1,249	$126,000
Blacks	$30,104	$251	$47	$80	$878	$56,000
Asians	$41,881	$541	$101	$80	$1,222	$121,000
Hispanics	$27,826	$195	$36	$80	$811	$43,500

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25077, B25103, S1903)

Location of Surry HOME Consortium Area Section 8 Voucher Holders by Opportunity Level									
Voucher Holders, Very Low Opportunity Areas		Voucher Holders, Low Opportunity Areas		Voucher Holders, Moderate Opportunity Areas		Voucher Holders, High Opportunity Areas		Voucher Holders, Very High Opportunity Areas	
#	%	#	%	#	%	#	%	#	%
143	18.7%	188	24.6%	176	23.1%	153	20.1%	102	13.4%

Source: Piedmont Triad Regional Council

MAP 18:
SECTION 8 VOUCHER HOLDERS AND AREAS OF OPPORTUNITY IN THE SURRY HOME CONSORTIUM



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 1.5 3 6 Miles

For households wanting to invest in buying a home rather than renting, minority household incomes may tend to be too low to achieve homeownership. In the Consortium area, the median household income for Whites was $42,874, $30,104 for Blacks, and $27,826 for Hispanics. The maximum purchase price a household making the median income for a White household could pay is approximately $126,000. A household making the median income for a Black household in the Surry HOME Consortium could pay approximately $56,000, and a household making the median income for a Hispanic household could pay approximately $43,500. At these thresholds, only the average median income of the Consortium's White households is high enough to buy a house priced at the median value. The maximum purchase price for Blacks is extremely low, and there are likely very few homes in the Surry HOME Consortium area priced at $56,000 and under. This lack of affordable housing may force some households into renting, becoming cost burdened, living in overcrowded or substandard conditions, or a combination of these factors. Minorities also face lower rates of mortgage approval in the area: the approval rate in the Piedmont Triad was 65.4% for Whites but only 48.4% for Blacks and 51.4% for Hispanics.

Impediments to fair housing choice

The Surry HOME Consortium area faces several policy-related impediments that either directly or indirectly limit fair housing choice

- Potential problems identified among the local zoning ordinances include restrictive siting for mobile/manufactured homes
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- A lack of paired testing in the housing market

Fair Housing Priorities

The Surry HOME Consortium area can take action to address important fair housing priorities

The demographic analysis, opportunity mapping, and housing market analysis found prevalent racially concentrated areas of poverty (or areas approaching these criteria), significant disparities in access to opportunity, and a disproportionate housing need based on protected class status. Factors contributing to these issues in the Consortium are:

1. A need for expanded public transportation to provide RCAP residents and other lower income residents with access to higher opportunity areas and community assets

The need for expanded public transportation service was given the highest priority because it can be implemented incrementally and beginning within a potentially shorter time frame. The extension of public transit routes and expansion of service hours will require capital investment over time.

Community	Score
Stokes County	1.18
Davie County	1.18
Surry County	1.36
Yadkin County	1.45

2. a need for greater affordable and accessible housing opportunities, both rental and sales units, in higher opportunity areas

The need for greater affordable and accessible housing opportunities in higher opportunity areas may require less public financing than expanded public transportation, but it will require a well-designed public education campaign against residential opposition to the development of affordable housing in some areas. This initiative will require time and the investment of significant human resources in the form of political and community leadership to play key roles in any campaign.

3. a need for sustainable employment opportunities within, or in closer proximity to, racially concentrated areas of poverty

The need for sustainable employment opportunities in or near RCAPs will require significant capital investment and time, including planning for potential revitalization, redevelopment and re-use of land and structures that are appropriate for new commercial and industrial uses.

These three priorities have the potential for mitigating each of the determinants of fair housing outlined in the AFH. All three priorities will require financial investments, strong political leadership, substantial changes to long-standing public policies, long-term public education, and lengthy implementation periods. However, none of these challenges should be used as reasons to dismiss the possibility of implementation of any one priority and the potential for cataclysmic change at the local and regional levels.

One of the most pragmatic ways to address these goals is through overcoming policy barriers. The zoning ordinances in Surry, Stokes, Davie, and Yadkin Counties were reviewed and benchmarked to uncover and systematically score its effectiveness in affirmatively furthering fair housing and minimizing discriminatory practices. The scores range from 1 to 2, with 1 being the lowest possible risk for potentially discriminatory provisions and 2 being the highest. The scores for the counties in the Surry HOME Consortium are in the table below:

This puts Stokes County and Davie County at low risk for discriminatory zoning practices, Surry County at a moderate risk, and Yadkin County at a moderate-to-high risk.

There are several practical direct actions the Consortium can undertake in a short time frame in order to affirmatively further fair housing. Firstly, the Consortium can incorporate required compliance with the federal Fair Housing Act in all HUD program sub-recipient agreements. Secondly, the Consortium can adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing. Thirdly, the Consortium should confirm that its HOME Program includes and implements the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods.

A Local Fair Housing Action Plan: Goals and Strategies for the Surry HOME Consortium

The goals and strategies established in this section are tailored to the Surry HOME Consortium

Goal 1: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Continue YVEDDI's and PART's rural transportation system, and coordinate with PTRC's rural planning organization on ways to improve service for lower income households to jobs, services, community colleges, and schools in higher opportunity areas

Strategy 2: With PTRC assistance, analyze non-entitlement local government zoning ordinances for consistency with benchmark practices, the goals of this AFH, Piedmont Together, and other relevant documents

Strategy 3: Continue the Section 8 Housing Choice Voucher program throughout the Consortium. Encourage managers of apartments and rental homes in higher opportunity areas to accept vouchers

Goal 2: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Invest the Consortium's HOME funding allocation to provide incentive for the development of affordable rental housing in higher opportunity areas

Strategy 2: Incorporate the Site and Neighborhood Standards criteria of the HOME program into the local site selection process throughout the Consortium

Strategy 3: Increase the Section 8 Housing Choice Voucher payment standard for rental units in higher-cost areas to expand housing choice

Strategy 4: Focus partnerships with affordable housing providers on expanding opportunities for new residential developments with priority for higher opportunity areas served by PART or YVEDDI systems

Goal 3: **Work with PTRC, HUD, the NC Fair Housing Center, or some other non-profit organization to Increase the awareness of fair housing education and outreach**

Strategy 1: Provide education and outreach training through a certified HUD fair housing agency to four groups: HOME staff and county boards and commissions, county department heads and elected officials, private landlords, and the general public

Strategy 2: Adopt a formal policy to refrain from allocating HOME funds to subrecipients that engage in discriminatory housing behavior

Strategy 3: Apply for funding to conduct paired testing in the local rental housing market

Goal 4: **Improve the physical environment in lower opportunity areas**

Strategy 1: Continue YVEDDI's and PTRC's weatherization programs to maintain and preserve the affordable housing stock

Strategy 2: Continue the Consortium's HOME-funded housing rehabilitation activities to preserve the affordable inventory for lower income households

Strategy 3: Help local governments in the Consortium area identify neighborhoods in lower-opportunity areas with high levels of distressed housing and poverty, and pursue resources to address conditions

Goal 5: **Improve the quality of life for Consortium residents**

Strategy 1: Continue YVEDDI's community services and programs

For More Information:

Michael Blair, Piedmont Triad Regional Council
mblair@ptrc.org

Bill McNeil, Piedmont Triad Regional Council
mcneilplanning@gmail.com

Fair Housing Strategies for Non-HUD Entitlement Communities Participating in the North Carolina Small Cities CDBG Program

In order to assure that grantees are fulfilling their requirement to affirmatively further fair housing, all units of local government applying for and receiving Community Development Block Grant (CDBG) funds from the State of North Carolina must document how they are meeting their fair housing obligations. Currently the State has a framework for local governments to meet fair housing compliance requirements that requires grantees to analyze local fair housing impediments and conduct activities to address them. It is recommended that PTRC and local governments in the Surry HOME Consortium area ask the State's CDBG program administrators to accept the following process for grantees in the region to meet fair housing requirements.

A local unit of government can participate in the State's CDBG Program by agreeing to undertake the following mandatory and voluntary actions appropriate to the conditions and needs in its area. All grantees receiving HUD funds through the State must complete at least three of the mandatory strategies listed below, and at least the one of the elective strategies regardless of whether they are using HUD funds for housing activities.

The implementation of the mandatory strategies must be carried out each year for which the jurisdiction has received HUD funds. This may be achieved through the posting of the information in a conspicuous public place and/or publication in a local newspaper of general circulation. The additional elective strategies selected by the unit of local government must be carried out during the course of the sub-recipient agreement with the State for an eligible activity.

PTRC should be involved in verifying the local grantees' reports for consistency with the Piedmont Triad Regional Assessment of Fair Housing.

Mandatory Activities to Promote Fair Housing: Sub-recipients must complete at least three of the following activities and implement them during the program year.

- Adopt a fair housing ordinance in which the municipality certifies it will not tolerate housing discrimination or undertake activities that promote segregation residential patterns
- Advertise and publicize that the local unit of government adheres to the requirements of the federal Fair Housing Act (adoption and use of the Equal Housing Opportunity logo and the Equal Housing Opportunity statement)
- Identify and publish the name and contact information of a Discrimination Complaint Officer within the agency or jurisdiction for any housing-related bias or discrimination complaint
- Refer housing discrimination complaints and assist in filing complaints with the U.S. Department of Housing & Urban Development, NC Fair Housing Center, or some other non-profit organization
- Advertise the availability of housing and related assistance to population groups that are least likely to apply through various forms of media (i.e. radio stations, posters, flyers, newspapers) and in English and other languages spoken by eligible families within the project service area
-
- Evaluate the local zoning ordinance against the fair housing benchmarks identified in this AI, using the Zoning Risk Assessment Tool. Evaluate the need for amendments to the zoning ordinance and make them.

Elective Activities to Promote Fair Housing: Sub-recipients must select any one or more of the following activities and implement them during the program year.

- Include a flyer about fair housing in a local utility or tax bill and send it to every household in the municipality

- Tap into the local media:
  - » Submit editorials and/or letters to the editor of a local newspaper
  - » Add a link on the municipality's website to HUD and the North Carolina human Relationships Commission

- Sponsor fair housing advertisements and programs on public access television

- Organize a local letter writing campaign to local legislators and state government about the need to fund and support fair housing programs
- Sponsor annual trainings for realtors, bankers, landlords, homebuyers, tenants, public housing authority and other city/town employees to educate them on their fair housing rights and responsibilities. This activity MUST be done in collaboration with PTRC or a local human relations commission.

- Provide training/educational programs about fair housing for financial, real estate, and property-management professionals at local firms, including their obligations to comply with the federal Fair Housing Act. This can be done by partnering with PTRC, a bank, board of realtors association, or other local group and helping to sponsor a program taught by a qualified entity.

- Conduct semi-annual meetings with advocacy groups for members of the protected classes (i.e. persons with disabilities, immigrants, refugees, etc.) on the availability of affordable and accessible housing and determine housing needs to plan future projects

- Join in establishing and/or funding a fair housing organization in the region to coordinate fair housing activities in areas where there are no such organizations

- Apply for funding to conduct fair housing testing to ensure that local housing providers and/or lenders do not discriminate, in coordination with a HUD-certified fair housing agency

- Assist Housing Choice Voucher program participants to help locate and secure housing outside of areas with high levels of of poverty and racial or ethnic concentration
- Conduct outreach to housing providers and housing developers to discuss affordable and accessible housing needs in RCAPs and near-RCAPs

- Incorporate universal design as a requirement for all publicly assisted housing

2

ANALYSIS OF DATA

This section of the Regional Assessment of Fair Housing will explore economic and other differences among the population. It will provide context for existing demographic, housing, and economic conditions that describe the effects of past policy decisions, and inform strategies for broadening the availability of housing opportunities for all Piedmont Triad residents.

POPULATION TRENDS

The Piedmont Triad is home to almost one-fifth of North Carolina's residents, currently containing over 1.6 million people. The Triad region includes 12 counties (Alamance, Caswell, Davidson, Davie, Forsyth, Guilford, Montgomery, Randolph, Rockingham, Stokes, Surry, and Yadkin) as well as five federal CDBG entitlement communities (Burlington, Greensboro, High Point, Winston-Salem and the Surry HOME Consortium).[1] The Surry HOME Consortium (SHC) encompasses Davie, Stokes, Surry, and Yadkin counties. In 2010, the four entitlement communities of Burlington, High Point, Greensboro, and the Surry HOME Consortium represented 634,720 residents and 38.1% of the region's population.

Population gains since 1970 have been steady, though they have not quite reached the rate of gain for the state. The region's population density has continued to be significantly higher than the state's (279 residents per square mile in 2010 compared to 196). All 12 counties in the region experienced population gain between 2000 and 2010, with five counties seeing gain in the double digits. More populous counties with populations over 100,000 tended to see larger population gains. Burlington, Greensboro, and High Point also experienced double-digit population gains.

While High Point and the Surry HOME Consortium experienced rates of population gain that are on par with the region as a whole since 1970, Burlington's has been significantly lower (39.1%) and Greensboro's has been higher (87.2%) than the total region's change.

Figure 18 : Decennial Population Change, 1970-2010

	Burlington	Greensboro	High Point	SHC	Region Total	North Carolina
1970	**35,930**	**144,076**	**63,229**	**118,651**	**1,001,625**	**5,084,411**
1980	**37,266**	**155,642**	**63,479**	**145,573**	**1,136,812**	**5,880,095**
1970-1980 Change	3.7%	8.0%	0.4%	22.7%	13.5%	15.6%
1990	**39,498**	**183,894**	**69,428**	**157,274**	**1,242,117**	**6,632,448**
1980-1990 Change	6.0%	18.2%	9.4%	8.0%	9.3%	12.8%
2000	**44,917**	**223,891**	**85,839**	**187,106**	**1,464,994**	**8,046,813**
1990-2000 Change	13.7%	21.8%	23.6%	19.0%	17.9%	21.3%
2010	**49,963**	**269,666**	**104,371**	**200,720**	**1,640,717**	**9,535,483**
2000-2010 Change	11.2%	20.4%	21.6%	7.3%	12.0%	18.5%
% Change 1970-2010	**39.1%**	**87.2%**	**65.1%**	**69.2%**	**63.8%**	**87.5%**

Source: Piedmont Triad Regional Council

1 Although Winston-Salem is located within the Piedmont Triad region, the city is not part of this Regional Assessment of Fair Housing because it recently completed its own Analysis of Impediments to Fair Housing Choice.

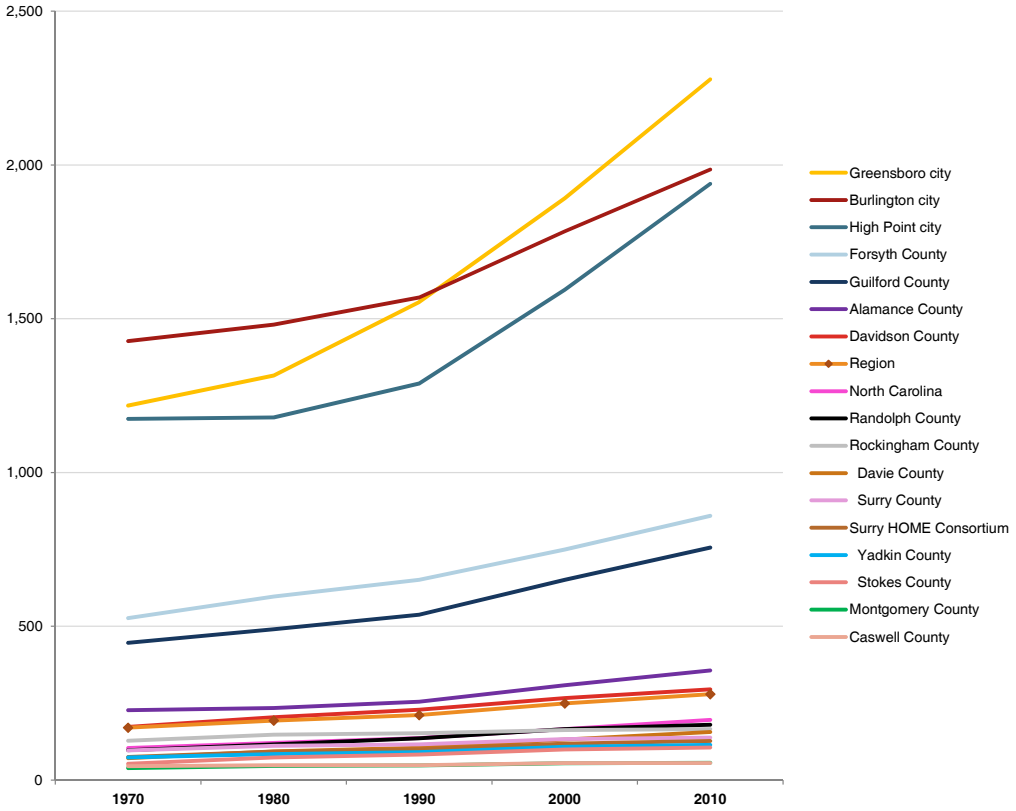
Figure 19 : Population Change by Location, 2000-2010

	2000	2010	% Change 2000-2010
North Carolina	8,046,813	9,535,483	18.5%
Region	**1,464,994**	**1,640,717**	12.0%
Burlington city	44,917	49,963	11.2%
Greensboro city	223,891	269,666	20.4%
High Point city	85,839	104,371	21.6%
Surry HOME Consortium	**187,106**	**200,720**	7.3%
Davie County	34,835	41,240	18.4%
Bermuda Run town	1,431	1,725	20.5%
Cooleemee town	905	960	6.1%
Mocksville town	4,178	5,051	20.9%
Stokes County	44,711	47,401	6.0%
Danbury town	108	189	75.0%
King city	5,952	6,904	16.0%
Walnut Cove town	1,465	1,425	-2.7%
Surry County	71,209	73,673	3.5%
Dobson town	1,457	1,586	8.9%
Elkin town	4,109	4,001	-2.6%
Mount Airy city	8,484	10,388	22.4%
Pilot Mountain town	1,281	1,477	15.3%
Yadkin County	36,351	38,406	5.7%
Boonville town	1,138	1,222	7.4%
East Bend town	659	612	-7.1%
Jonesville town	2,259	2,285	1.2%
Yadkinville town	2,818	2,959	5.0%
Alamance County	130,800	151,131	15.5%
Caswell County	23,501	23,719	0.9%
Davidson County	147,250	162,878	10.6%
Forsyth County	306,063	350,670	14.6%
Guilford County	421,048	488,406	16.0%
Montgomery County	26,827	27,798	3.6%
Randolph County	130,471	141,752	8.6%
Rockingham County	91,928	93,643	1.9%

Source: Piedmont Triad Regional Council

While High Point and SHC experienced rates of population gain that are on par with the region as a whole over the past several decades, Burlington's has been significantly lower and Greensboro's has been higher.

Figure 20 : Population Density Change (per mile) by Area, 1970-2010



Density has increased in all areas of the region, but the largest increases in density have occurred in the cities of Greensboro, Burlington, and High Point.

The Piedmont Triad has become a more diverse region since 2000. Although the region saw an increase in White residents, the growth amongst other racial and ethnic groups was much more pronounced. For example, the Hispanic population almost doubled, and the Asian population increased 80.6% (Hispanic ethnicity is counted separately from race in U.S. Census Bureau data). Out of the non-White population groups, the Black population increased the least, but the rate of increase was still much higher than the White population increase (18.2% compared to 4.3%). The Black population is still the largest racial or ethnic minority in the region and in each of the entitlement communities except for the Surry HOME Consortium.

The four entitlement communities also saw more growth among non-White populations. Burlington lost a small portion of its White population (3.4%). The largest increase in residents was in the Hispanic population. In 2000, the Hispanic population was 40% of the size of the Black population, but by 2010, it had reached 57%.

In Greensboro, the White population increased only 5.0%, but two other groups more than doubled in size. Hispanic residents increased 108.7%, and residents who identified as "Some Other Race" increased 121.4%. Asian residents also increased significantly (69.5%). In Burlington, the largest non-White population gains were among residents who identified as "Some Other Race" and Asian residents (134.5% and 121.2%, respectively).

While Hispanic residents remained the largest racial or ethnic minority in the four-county Surry HOME Consortium area, the area saw the smallest gains in non-White residents. It lost 2.5% of its Black residents and added only around 100 Asian residents to its small Asian population. Hispanic residents remained the largest racial or ethnic minority in the region, with an increase of 62.4%. The steepest increase was in the "Some Other Race" category (106.5%).[1]

1A recent U.S. Census Bureau report found that over one-third of Hispanics identified as "Some Other Race" in the 2010 Census.

Figure 21 : Racial and Ethnic Composition by Area, 2000-2010

	2000		2010		%
	#	%	#	%	Change
Region	**1,464,979**	**100.0%**	**1,640,717**	**100.0%**	**12.0%**
White	1,099,957	75.1%	1,146,900	69.9%	4.3%
Non-White	365,022	24.9%	493,817	30.1%	20.8%
Black or African American	288,080	19.7%	340,448	20.7%	18.2%
American Indian and Alaska Native	5,271	0.4%	7,970	0.5%	51.2%
Asian/Pacific Islander	18,461	1.3%	33,339	2.0%	80.6%
Some other race	35,867	2.4%	79,979	4.9%	123.0%
Two or more races	17,343	1.2%	32,081	2.0%	85.0%
Hispanic*	72,867	5.0%	142,829	8.7%	96.0%
Burlington	**44,917**	**100**	**49,963**	**100**	**11.2%**
White	29,766	66.3	28,760	57.6	-3.4%
Non-White	15,151	33.7%	21,203	42.4%	25.8%
Black or African American	11,252	25.1	13,998	28	24.4%
American Indian and Alaska Native	154	0.3	335	0.7	117.5%
Asian/Pacific Islander	782	1.7%	1,062	2.1%	35.8%
Some other race	2,316	5.2	4,584	9.2	97.9%
Two or more races	647	1.4	1,224	2.4	89.2%
Hispanic*	4,525	10.1	7,990	16	76.6%
Greensboro	**223,891**	**100**	**269,666**	**100**	**20.4%**
White	124,243	55.5	130,396	48.4	5.0%
Non-White	99,648	44.5%	139,270	51.6%	16.0%
Black or African American	83,728	37.4	109,586	40.6	30.9%
American Indian and Alaska Native	989	0.4	1,385	0.5	40.0%
Asian/Pacific Islander	6,446	2.9%	10,929	4.1%	69.5%
Some other race	4,647	2.1	10,290	3.8	121.4%
Two or more races	3,838	1.7	7,080	2.6	84.5%
Hispanic*	9,742	4.4	20,336	7.5	108.7%
High Point	**85,839**	**100**	**104,371**	**100.0%**	**21.6%**
White	51,985	60.6	55,989	53.6%	7.7%
Non-White	33,854	39.4%	48,382	46.4%	17.5%
Black or African American	27,275	31.8	34,394	33.0%	26.1%
American Indian and Alaska Native	392	0.5	579	0.6%	47.7%
Asian/Pacific Islander	2,889	3.4%	6,390	6.1%	121.2%
Some other race	1,950	2.3	4,573	4.4%	134.5%
Two or more races	1,348	1.6	2,446	2.3%	81.5%
Hispanic*	4,197	4.9	8,847	8.5%	110.8%
Surry HOME Consortium	**187,113**	**100.0%**	**200,720**	**100.0%**	**7.3%**
White	171,299	91.5%	179,054	89.2%	4.5%
Non-White	15,814	8.5%	21,666	10.8%	27.7%
Black or African American	8,663	4.6%	8,450	4.2%	-2.5%
American Indian and Alaska Native	412	0.2%	603	0.3%	46.4%
Asian/Pacific Islander	724	0.4%	832	0.4%	14.9%
Some other race	4,367	2.3%	9,017	4.5%	106.5%
Two or more races	1,648	0.9%	2,764	1.4%	67.7%
Hispanic*	9,022	4.8%	14,654	7.3%	62.4%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

The Black population is the largest minority by population in the region, including in three of the four entitlement communities. The largest increases have been in the Hispanic population.

The four entitlement communities saw a sharper decrease in their percentages of White residents than in the Piedmont region as a whole. This is reflective of national urban trends, as the United States becomes more diverse. However, the Hispanic portion of the population increased much more substantially in the non-entitlement area of the Triad. In 2000, the entitlement communities were home to a slightly larger proportion of Hispanic residents. By 2010, the entitlement community Hispanic population had increased 63.5%, but in the non-entitlement and mostly rural counties, the Hispanic population had increased a significantly higher 82.2%.

Figure 22 : Minority Share of Entitlement Community Population

	2000	2010	% Change
Region without entitlement communities			
White	78.3%	74.1%	-5.4%
Non-White or two or more races	21.7%	25.9%	19.3%
Hispanic*	4.9%	9.0%	82.2%
Entitlement communities			
White	69.6%	57.6%	-17.3%
Non-White or two or more races	30.4%	36.9%	21.5%
Hispanic*	5.1%	8.3%	63.5%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 and 2010 (DP01)

QUANTIFYING INTEGRATION

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. An extreme example of residential segregation is predominantly homogenous, White, suburban communities and low-income, minority, inner-city neighborhoods. Latent factors, such as historical settlement patterns, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community may create other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

Federal regulations at 24 CFR Part 91.210 require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that are concentrations of racial/ethnic minorities and/or low-income persons. This section explains and applies several calculators for racial and ethnic segregation in the Piedmont Triad region.

Regional Dissimilarity

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 1, in which a score of 0 corresponds to statistically perfect integration and a score of 1 represents total segregation. The index is typically interpreted as the percentage of the minority population that would have to move in order for an area to achieve completely uniform representation of the two racial groups being compared relative to the larger region. In this case, the larger region is the Piedmont Triad. While the context of the geographic area must be taken into consideration, an index of 0 to .3 is generally considered low, an index of .3 to .6 is considered moderate, and an index of above .6 is considered high.

Figure 23 : Regional Dissimilarity Indices, 2000-2010

		DI With White/Non-Hispanic Population	Population	Share of Total Population
2000	White	-	1,099,957	75.08%
	Black	**0.545**	288,080	19.66%
	American Indian	**0.300**	5,271	0.36%
	Asian/Pacific Islander/Native Hawaiian	**0.471**	18,461	1.26%
	Other	**0.475**	35,867	2.45%
	Two or More Races	**0.322**	17,343	1.18%
	Hispanic*	**0.401**	72,867	4.97%
	Total		**1,464,979**	
2010	White	-	1,097,040	66.86%
	Black	**0.549**	335,708	20.46%
	American Indian	**0.303**	5,777	0.35%
	Asian/Pacific Islander/Native Hawaiian	**0.483**	32,868	2.00%
	Other	**0.429**	2,663	0.16%
	Two or More Races	**0.285**	23,832	1.45%
	Hispanic*	**0.361**	142,829	8.71%
	Total		**1,640,717**	

*Hispanic ethnicity is calculated independently of race. Share of population values do not necessarily sum to 100%.

Source: U.S. Census Bureau, Census 2000 and 2010

Dissimilarity between Whites and members of other races changed very little between 2000 and 2010. In 2010, dissimilarity remained within 2 points of its 2000 value for Whites and Blacks, Whites and American Indians, and Whites and Asians. The index shows more integration between Whites and multi-racial residents, and between Whites and Hispanics, although this may partly be attributed to changes in how the Census defined Hispanic ethnicity between the two time periods (additional clarifications separating Hispanic ethnicity from race were added in 2010). Dissimilarity between Whites and Blacks has declined from a high of .712 in 1970 to its current level of .545, marking a significant movement towards integration in the region. However, the lack of decline—and even slight increase—between 2000 and 2010 may mark a leveling off.

With a White-Black dissimilarity index of .549, the Piedmont Triad qualifies as moderately segregated by national standards. This indicates that 54.9% of Black residents would have to move to another block group in order to achieve full integration within the Piedmont Triad. Although the highest dissimilarity values were between Whites and Blacks, there are also moderately high values between Whites and Asians/Pacific Islanders/ Native Hawaiians, Whites and Hispanics, and Whites and members of other races. The relatively low dissimilarity scores between Whites and Native Americans and Whites and multi-racial residents indicate that they are relatively integrated within the region. Integration between Whites and Hispanics has been steadily increasing since 1990, the first decade in which data for the Hispanic ethnicity as it is currently calculated became available.

Figure 24 : Regional Dissimilarity Indices, 1970-2010

	Black	Asian	Hispanic
1970	0.713	0.460	*
1980	0.628	0.604	*
1990	0.570	0.355	0.436**
2000	0.545	0.471	0.401
2010	0.549	0.483	0.361

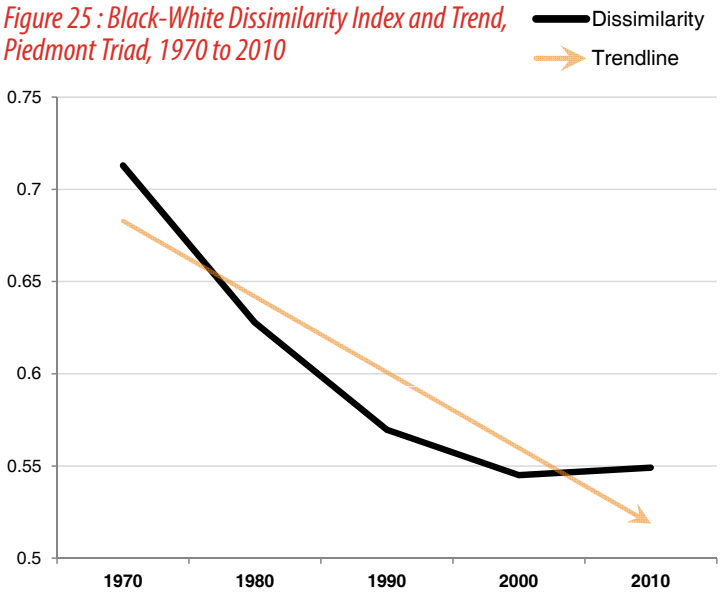
Source: Census 1960-2010 SF-1, National Historical Geographic Information System: Version 2.0. University of Minnesota, 2014

*Corresponding data for this ethnicity was not calculated at the census tract level prior to 1990

**Source: CensusScope, Social Science Data Analysis Network

Calculations by Mullin & Lonergan Associates

Figure 25 : Black-White Dissimilarity Index and Trend, Piedmont Triad, 1970 to 2010



The Triad's Black and White populations remain moderately segregated, although integration has increased steadily since 1970.

Local Dissimilarity

Dissimilarity indices at the local level were calculated for Burlington, Greensboro, High Point, and the Surry HOME Consortium using time-series data from 1980 to 2010. Because of the rural nature of much of the Piedmont Triad in 1970, localized calculations for 1970 had too small a sample size to be reported. Other races that had adequate representation at the Triad level did not have enough representation at the smaller tract level to be calculated. However, local data is reliable for the three most common racial or ethnic groups in the Piedmont Triad.

Dissimilarity, or segregation, is mostly decreasing in all areas of the Piedmont Triad. Segregation between Whites and Blacks, which remained high in 1980, has steadily decreased in all four local areas. White-Black dissimilarity remains high in Greensboro, suggesting that while the city has made considerable progress it remains a substantially segregated city. Burlington, High Point, and the Surry HOME Consortium all had similar White-Black dissimilarity indices, although the four-county Consortium area has a much smaller percentage of Black residents. The rate of change in White-Black integration has also slowed, suggesting the current settlement pattern is approaching a sort of equilibrium.

Dissimilarity between Whites and Hispanics is rising in all three major cities. This means that Hispanics are becoming less integrated and dispersed within the population as a whole over time. This observation validates the perception of stakeholders in the region who noted that the rapidly growing Hispanic communities are forming ethnic enclaves in the region. Given the fact that the Hispanic population is growing rapidly throughout the Piedmont Triad, and that many new Hispanic residents are either first-generation or second-generation immigrants, this pattern is consistent with the settlement patterns of most immigrant communities that have settled in the United States. However, the increase in dissimilarity may also be an indicator of limited housing choice. It will be important to monitor and evaluate the status of the Hispanic community in the future to ensure fair housing choice.

White and Asian dissimilarity occurs at the lowest rate in all four entitlements. Much of this is likely correlated with Asians having similar (and often higher) median household incomes and levels of educational attainment compared to Whites. Interestingly, the White-Asian dissimilarity index for High Point has decreased despite a significant influx of low-income refugees from predominantly Asian countries. This may suggest that the refugee population is either not concentrated enough to form ethnic enclaves or is too small to influence the dissimilarity index.

Figure 26 : Local Dissimilarity Indices, 1980-2010

		1980	1990	2000	2010	Trend
Burlington	White and Black	0.59	0.45	0.48	0.42	*Decreasing*
	White and Hispanic*	0.31	0.15	0.41	0.48	*Increasing*
	White and Asian	0.33	0.17	0.26	0.24	*Decreasing*
Greensboro	White and Black	0.71	0.60	0.57	0.57	*Decreasing*
	White and Hispanic*	0.33	0.22	0.46	0.49	*Increasing*
	White and Asian	0.29	0.27	0.35	0.36	*Increasing*
High Point	White and Black	0.64	0.58	0.47	0.46	*Decreasing*
	White and Hispanic*	0.37	0.20	0.47	0.39	*Increasing*
	White and Asian	0.39	0.19	0.35	0.34	*Decreasing*
Surry HOME Consortium	White and Black	0.53	0.33	0.34	0.41	*Decreasing*
	White and Hispanic*	0.52	0.27	0.22	0.25	*Decreasing*
	White and Asian	0.49	0.27	0.32	0.33	*Decreasing*

Source: American Community Survey, 1980-2010

*Hispanic ethnicity is calculated independently of race

In 2010, Greensboro was the most segregated area and the Surry HOME Consortium was the least segregated. Greensboro was also the most segregated area in 1980, although its dissimilarity scores have decreased. The four-county Surry HOME Consortium area has seen substantial decreases in the level of dissimilarity between Whites and Blacks, Whites and Hispanics, and Whites and Asians.[1] The Surry HOME Consortium's dissimilarity index for Hispanics has particularly reduced, going from a relatively high value in 1980 to a relatively low value in 2010. Burlington and High Point have had similar average reductions in segregation.

Moran's I

One further measure of segregation, Moran's I scoring for racial distributions, indicates moderate to high levels of White isolation from minorities across the region. The main finding of the Moran's I analysis is that block groups with high percentages of White residents tend to be located near other block groups with high rates of White residents.

1 However, the small sample size and low population in many of the tracts in the Surry HOME consortium may amplify changes in racial and ethnic settlement patterns.

This tool is most useful in analyzing the different degrees of clustering amongst different races and ethnicities between different areas of the Triad. Throughout the region, block groups with high percentages of White residents are more clustered together than block groups with high percentages of other racial groups. This is likely due to the largely White populations in the rural areas of the Triad. However, block groups with high percentages of Whites are also more clustered together in the areas of Burlington, Greensboro, and High Point. Block groups with concentrations of Hispanics are highly clustered within Burlington and the Surry HOME Consortium, but are much less so in Greensboro and High Point. Block groups with high percentages of Black residents were not the most clustered. Rather, Whites were the most clustered in the region and the smaller areas. Combined with the results shown on Map 19, which demonstrate high overlap between different minority concentrations in block groups, this suggests that the Triad can be classified into "White areas" and "non-White areas" rather than clusters of a single particular ethnicity. These results were statistically significant in all but one calculation (Asian clustering in Greensboro).

Full results of the Moran's I score analysis appear in Appendix A.

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racial concentration is an important factor to examine from a fair housing perspective, because high areas of racial concentration may indicate lack of choice and discrimination in the housing market. Across the Piedmont Triad, Blacks constituted 20.7% of the population, Hispanics 8.7%, and Asians and Pacific Islanders 2.0% . The average concentrations by block group, meaning what percentage of the residents in a census block group are members of these races or ethnicities, are slightly different:

- The average concentration of Blacks by block group was 20.94%
- The average concentration of Hispanics by block group was 8.89%
- The average concentration of Asians was 1.82%.

Across the 1,114 block groups within the study area:

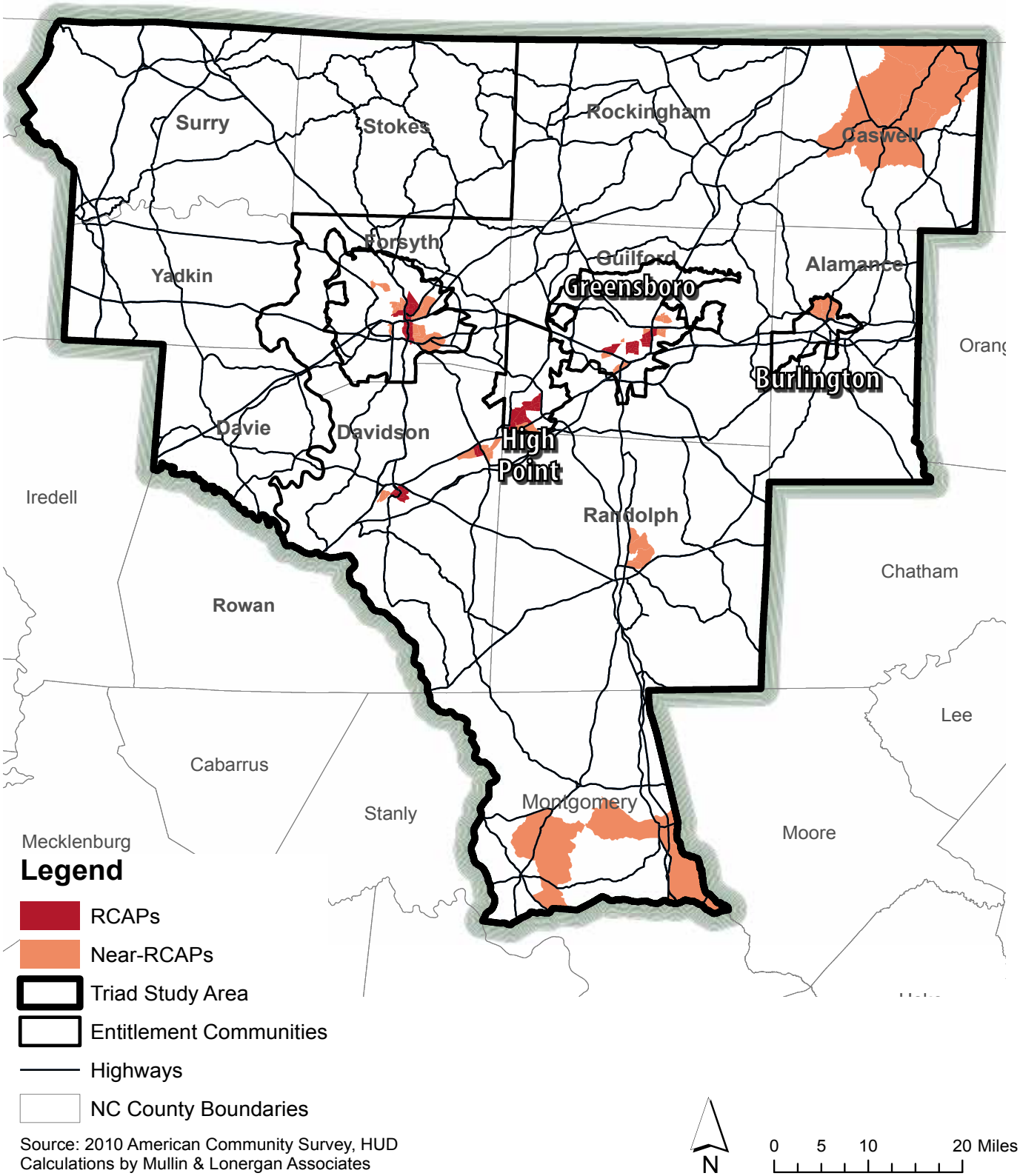
- 186 block groups had a concentration of Blacks 10% above the mean
- 104 block groups had a concentration of Hispanics 10% above the mean
- 18 block groups had a concentration of Asians/Pacific Islanders 10% above the mean.

As part of the FHEA completed in 2013, racially and ethnically concentrated areas of poverty (RCAPs) were defined and identified. A racially concentrated area of poverty (RCAP) or ethnically concentrated area of poverty (ECAP) is a geographic area where both high poverty rates and a high percentage of minorities are clustered. A racially concentrated area of poverty (RCAP) or ethnically concentrated area of poverty (ECAP) is traditionally defined by HUD as a geographic area where the total non-White population in an area is greater than 50% and the poverty rate is greater than 40%. While there are several other viable calculation methods that may be utilized, this AFH uses this common HUD-given definition as well, at the block group geography. References to RCAPs in this research refer to block groups where the total non-White population is greater than 50% and the poverty rate is greater than 40%. The average poverty rate per block group in the Piedmont Triad was 17.2% of the population living below the poverty line.

Because the HUD data provided for the Fair Housing Equity Assessment treats Hispanic ethnicity the same as race, non-White Hispanics cannot be separated from White Hispanics, Black Hispanics, or other races amongst ethnically Hispanic residents. Due to this data limitation, this study treated Hispanic ethnicity as a single minority group. Other races and ethnicities, such as Native American and Alaska Native, did not have representation high enough to be significant within the study area to analyze racial and ethnic concentration. The data also does not denote differences between ethnicities within races, which is important to consider when examining factors such as refugee resettlement initiatives.

With a few minor exceptions, the same RCAP areas identified in the FHEA were also revealed in this AFH. While the FHEA examined racial concentration at the tract level, the AFH examines concentration at the more granular block group level.

MAP 19:
RACIALLY CONCENTRATED AREAS OF POVERTY



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

In addition to block groups that can be classified as RCAPs, there are many "near-RCAP" block groups. These block groups are very near the two criteria thresholds (high minority concentration and high poverty rate) but do not quite meet them. There are also areas of racial concentration in areas that do not have concentrated poverty, and concentrated poverty in predominantly White areas. These block groups are important to consider and are evaluated as well. Map 19 isolates block groups that have met both criteria for concentration of racial minorities and for persons living below the poverty line. The block groups in the lighter shade of Map 19 represent "near-RCAP" block groups, which meet the lesser threshold of a 40% concentration of minority residents and 30% poverty rate. These were included because of the large number of block groups in the study area that were on the cusp of being classified as RCAPs.

Racial concentrations significantly above the regional mean reveal nuances of minority settlement patterns that an RCAP analysis would not pick up on. Using the mean as a yardstick makes the concentration relative to the unique demographics of the Piedmont Triad. Furthermore, RCAPs aggregate all races into minority and non-minority. Examining concentrations of individual races is more revealing. For example, there is a high Asian concentration in Guilford County, although one area is in a relatively affluent and otherwise White area west of Greensboro, and the other is located in an RCAP in High Point. These concentrations are not mutually exclusive: there is significant overlap between areas of Black, Hispanic, and Asian concentration in the region.

There are 56 block groups classified as RCAPs within the Piedmont Triad region. They are concentrated in Guilford County, Forsyth County, and Davidson County. All RCAPs are within the metropolitan areas of Greensboro, High Point, Winston-Salem, Lexington, and Thomasville. The dominant race in all RCAPs was Black/African-American. There were no ethnically concentrated areas of poverty. The near-RCAP block groups are more dispersed; in addition to being present in these larger cities, they are also present in or near the cities of Burlington, Asheboro, and Yanceyville and rural parts of Montgomery County and Caswell County.

Areas of racial concentration correlate strongly, but not perfectly, with poverty. Outside of RCAPs and near-RCAPs, significant Black concentrations were clustered near major cities, and also appear in rural areas in Caswell, Alamance, Stokes, Rockingham, Yadkin, Rockingham, and Montgomery Counties. Areas of high Hispanic concentration outside of RCAPs and near-RCAPs can be found in rural areas such as Randolph, Surry, and Montgomery Counties. There is also a significant urban Hispanic concentration in Burlington. Areas of high Asian concentration can be found in the exurban areas between Winston-Salem and Greensboro.

Map 20 compares the block groups meeting the criteria for Black, Hispanic, or Asian/Pacific Islander concentration. There is significant overlap between the three racially concentrated areas.

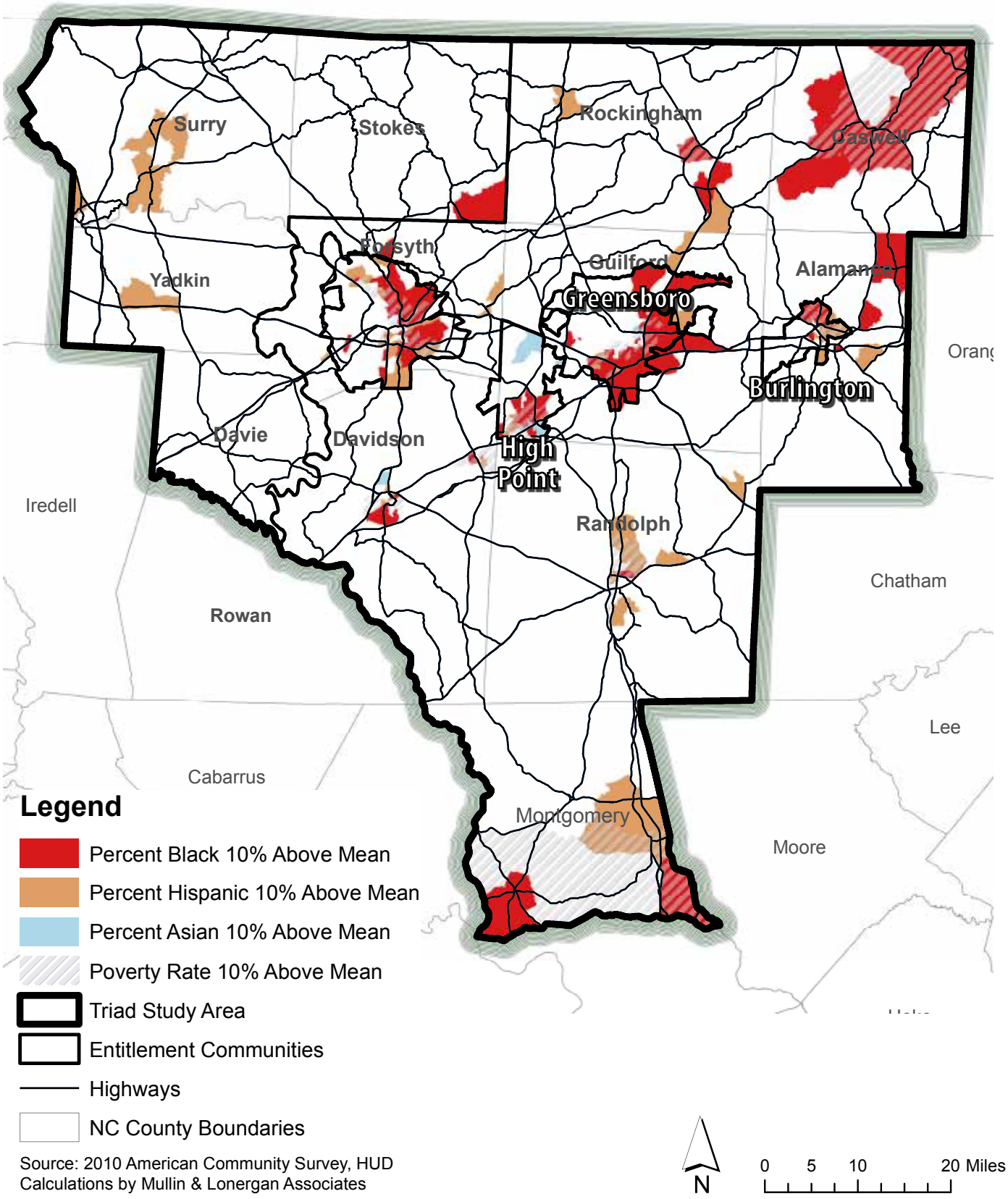
Appendix A contains detailed tables on racially/ethnically concentrated block groups.

While there is no way to separate students from the general population in the dataset provided by HUD, the existence of RCAPs in some block groups is likely attributable to the presence of colleges and universities, particularly the North Carolina Agricultural and Technical State University, the University of North Carolina at Greensboro, Bennett College, and Greensboro College. Students often have incomes low enough to be effectively living below the poverty line, although they are not the target demographic of this analysis. Some of these schools are historically Black institutions, which also increases the number of minorities in the tract. Colleges and universities affect Census tracts 110, 112, and 115 (see Appendix A for a full list of tracts).

There are 56 block groups classified as RCAPs within the Piedmont Triad region. They are concentrated in Guilford County, Forsyth County, and Davidson County. All RCAPs are within the metropolitan areas of Greensboro, High Point, Winston-Salem, Lexington, and Thomasville.

An additional 118 block groups across the region have characteristics that classify them near the RCAP threshold. The near-RCAP block groups are more dispersed; in addition to being present in these five larger cities, they are also present in or near the cities of Burlington, Asheboro, and Yanceyville.

MAP 20:
RACIALLY AND/OR ETHNICALLY CONCENTRATED AREAS



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

RACE/ETHNICITY AND INCOME

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental lease. Median household income (MHI) in the Piedmont Triad was $43,534 in 2012, below the state median of $46,450 and the national median of $53,046. Davie County had the highest median in the region in 2012 at $51,844. Montgomery County had the lowest at $33,861. Generally, median income levels were lower in the less densely populated areas of the region.

Across racial and ethnic groups in the Piedmont Triad, Asians had the highest MHI at $50,629. However, Asians make up just 2% of the regional population. The MHI for White households was $49,626. Hispanic and Black households had MHI's steeply lower, at $32,155 and $31,861, respectively.

As suggested by the lower median incomes among Blacks and Hispanics, minority residents in the Piedmont Triad experienced poverty at greater rates than White residents. Just 12.8% of Whites were living in poverty in 2012, compared with 26.7% of Blacks and 35.4% of Hispanics. Interestingly, Asian households experienced poverty at a rate of 20.1%. Combined with data reporting a high MHI amongst Asian households, this suggests that the Asian population may contain vast income disparities.

In each of the four entitlement communities, one in three Hispanic households lives in poverty. Black households fare only slightly better, except in Burlington, where Black households experience poverty at slightly higher rates than Hispanic households. Asian households represent a small portion of the population (between 2% and 7% in the entitlement communities), and their rates of poverty vary. In High Point, Asian households experience higher rates of poverty than Hispanics (36.9% to 34.1%), but in Burlington, only 4.2% of Asian households live in poverty.

Stakeholder interviews revealed that High Point and Greensboro have an extensive refugee resettlement network, while Burlington does not. Because many refugees are coming from Asian countries such as Bhutan and Myanmar, this may explain the vast discrepancy between Asian poverty rates within the Triad.

Figure 27 : Income and Poverty by Race/Ethnicity

	Median HH Income	Poverty Rate
Region	**$43,534**	**17.1%**
Whites	$49,626	12.8%
Blacks	$31,861	26.7%
Asians	$50,629	20.1%
Hispanics	$32,155	35.4%
Burlington	**$38,183**	**21.9%**
Whites	$47,152	12.6%
Blacks	$27,151	34.4%
Asians	$33,724	4.2%
Hispanics	$33,333	32.2%
Greensboro	**$41,556**	**18.8%**
Whites	$53,017	11.4%
Blacks	$31,750	26.7%
Asians	$48,038	20.2%
Hispanics	$31,395	32.1%
High Point	**$44,367**	**20.4%**
Whites	$53,521	10.2%
Blacks	$30,938	30.8%
Asians	$42,452	36.9%
Hispanics	$37,612	34.1%
SHC	**$41,607**	**16.9%**
Whites	$42,669	15.1%
Blacks	$31,062	28.2%
Asians	$50,965	28.0%
Hispanics	$31,885	36.5%

Source: U.S. Census Bureau, 2008-2012 American Community Survey (DP02, DP03, B11001A, B11001B, B11001D, B11001I, B17001A, B17001B, B17001D, and B17001I)

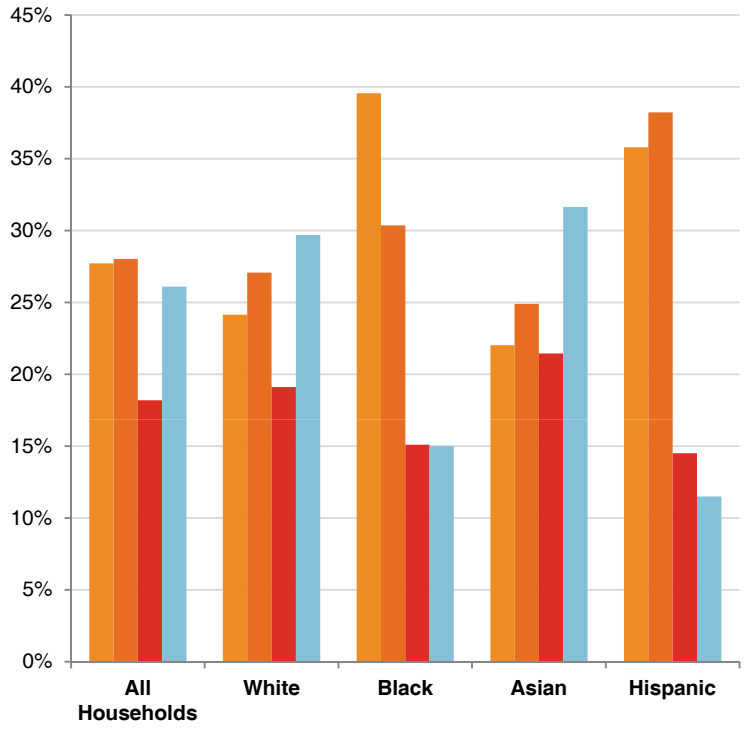
Median income levels are generally lower in the less densely populated rural counties.

Stakeholder interviews revealed an extensive refugee network centered in High Point, which may influence Asian poverty rates.

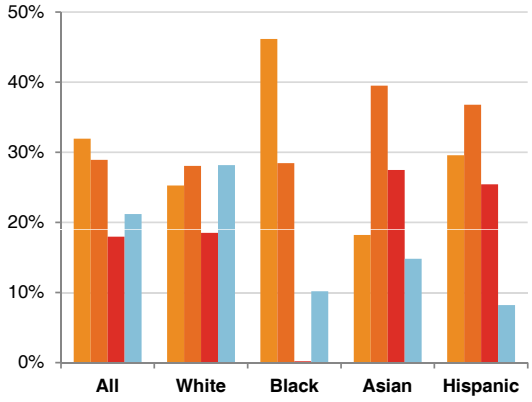
Over twice as many Black households and nearly three times as many Hispanic households live in poverty, compared to Whites households in the region.

The distribution of household income across income tiers by race and ethnicity is comparable to the trends previously described, showing a disparity between White and non-White households in both the region as a whole and the entitlement communities. While White households are somewhat evenly distributed across income tiers, 70% of Black households earn less than $50,000. Almost 75% of Hispanic households earn less than $50,000. In contrast, almost one-third of White and Asian households in the region had annual incomes exceeding $75,000.

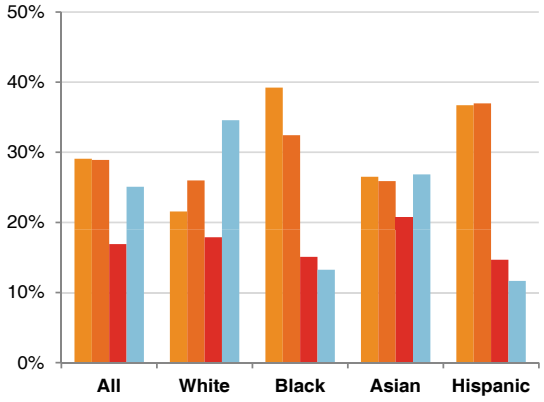
Figure 28 : Regional Household Income Distribution by Race/Ethnicity



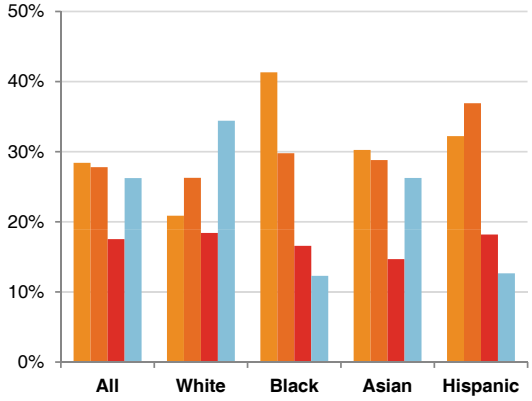
Burlington



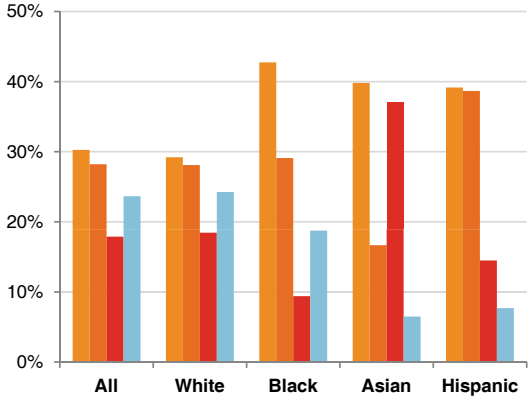
Greensboro



High Point



Surry HOME Consortium



DISABILITY AND INCOME

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). Across the region, 12.6% of the total civilian non-institutionalized population above the age of five reported a disability in 2012.

The most common type of disability among persons ages 18 to 64 was ambulatory, referring to difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation. Almost 60,000 residents, or 3.6%, between ages 18 and 64 reported this type of difficulty, which translates to a need for accessible housing. Additionally, about one in every four seniors age 65 and above reported an ambulatory disability. The second most common type of disability was a cognitive disability, which affected 44,021 persons in the Piedmont Triad. While persons with mental illness or intellectual impairments are not specifically identifiable, they often fall into this category of disability. Of Piedmont residents ages 18 to 64, 2.4% reported a sensory disability such as vision or hearing. About one in five seniors reported the same.

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In the seven counties where data was available on the economic conditions of persons with disabilities (Alamance, Davidson, Forsyth, Guilford, Randolph, Rockingham, and Surry), persons with disabilities were almost twice as likely as persons without disabilities to live in poverty. In 2012, 21.7% of residents with disabilities lived in poverty, compared to 13.5% of persons without disabilities who were living in poverty. Median earnings for disabled persons age 16 and older were $18,860, compared to $28,336 for those without disabilities.

Persons with disabilities were almost twice as likely to experience poverty.

62% of the region's foreign-born population came from Latin American countries, while 21.6% were from Asian countries.

26.7% of the foreign-born population for which poverty status is determined fell below the poverty line, compared to 17.1% of all persons regionwide.

ANCESTRY AND INCOME

It is illegal to refuse the right to housing based on a place of birth or ancestry. Census data on native and foreign-born populations reported that in 2012, 7.4% of all Piedmont Triad residents, 121,445 were foreign-born. The foreign-born populations in Burlington, Greensboro, and High Point were larger (9.1%, 10.5%, and 12.0%, respectively), while the population in the Surry HOME Consortium was 4.3%. By way of origin, over half (62.0%) of the region's foreign-born population came from Latin American countries, while 21.6% were from Asian countries. Just 7.9% were from Europe and 6.4% were from Africa.

The Piedmont Triad's foreign-born population is more likely to experience poverty than the population as a whole. According to 2008-2012 American Community Survey estimates, 26.7% of the foreign-born population for which poverty status is determined fell below the poverty line, compared to 17.1% of all persons regionwide.

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak, or understand English. American Community Survey data reports on the non-English language spoken at home for the population five years and older. In 2012, the ACS reported 81,833 persons, or 5.0% of the population, in the region spoke English less than "very well." The most commonly-spoken language amongst the LEP population in all areas of the Piedmont Triad is Spanish. The other eight language groups with more than 1,000 persons with LEP included French, Chinese, Korean, Mon-Khmer or Cambodian, Vietnamese, Other Asian Languages, Arabic, and African languages.

Additional data on foreign-born populations is provided in Appendix A.

Figure 29 : Limited English Proficiency by Language Group

	Number of LEP Speakers	Percentage of Total Population
Region		
Spanish or Spanish Creole	62,606	3.8%
Vietnamese	3,405	0.2%
Chinese	1,868	0.1%
African languages	1,286	0.1%
Arabic	1,206	0.1%
Mon-Khmer, Cambodian	1,143	0.1%
Burlington		
Spanish or Spanish Creole	2,924	5.8%
Vietnamese	159	0.3%
Korean	105	0.2%
Hmong	85	0.2%
Chinese	69	0.1%
Laotian	50	0.1%
Greensboro		
Spanish or Spanish Creole	8,348	3.1%
Vietnamese	2,078	0.8%
African languages	940	0.3%
Arabic	656	0.2%
Chinese	621	0.2%
French	482	0.2%
High Point		
Spanish or Spanish Creole	3,816	3.7%
Vietnamese	577	0.6%
Urdu	340	0.3%
Other Asian languages	306	0.3%
Korean	252	0.2%
African languages	240	0.2%
SHC		
Spanish or Spanish Creole	6,550	3.3%

Source: U.S. Census Bureau, 2008-2012 American Community Survey (DP05 and B16001)

FAMILIAL STATUS AND INCOME

The Census Bureau divides households into family and non-family households. Family households are married couples with or without children, single-parent families, and other families comprised of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In the Piedmont Triad, female-headed households with children grew from 7.1% of all households to 2000 to 7.9% in 2010. Female-headed households without children also represented a larger portion of the population in 2010 than in 2000. This is reflective of a national trend, as more females choose to have children at a later age.

Data on male-headed households was unavailable for the 2000 Census, but in 2010, they comprised less than 5% of the population. By comparison, married-couple family households with children declined from 22.2% to 18.7% over the course of the decade. Non-family households comprise a steadily growing share of the population, expanding from 2000 to 2010. The four entitlement communities experienced similar changes in household types between 2000 and 2010.

Female-headed households with children comprised 7.9% of all households, but 40.8% of all families in poverty.

Figure 30 : Households by Type, 2000-2010

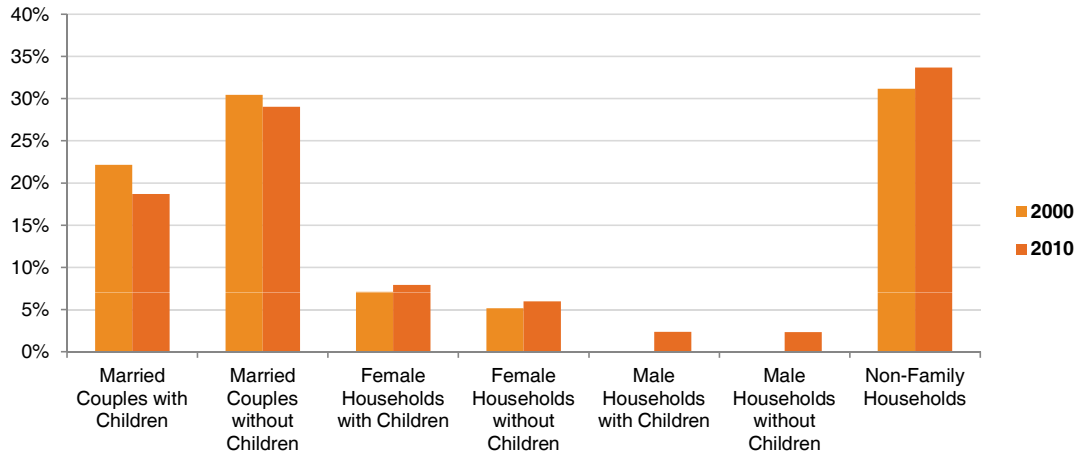


Figure 31 : Female-Headed Households and Poverty

	Family Households		Families in Poverty	
	Female-headed Households	Families in Poverty	Female-Headed Households with Children	Married-Couple Families with Children
Region	12.1%	12.7%	40.8%	20.4%
Burlington	17.3%	17.2%	53.8%	11.0%
Greensboro	17.4%	13.7%	46.7%	16.6%
High Point	18.2%	16.7%	52.4%	17.0%
SHC	8.4%	12.5%	27.1%	26.1%

Source: U.S. Census Bureau, 2008-2012 American Community Survey (DP02, DP03)

RESIDENTIAL SEGREGATION BY INCOME

The Pew Research Center has developed a metric to describe the degree to which high- and low-income residents are spatially segregated from one another within a metropolitan area. The Residential Income Segregation Index (RISI) is calculated by combining the share of low-income residents who live in majority low-income census tracts with the share of high-income residents who live in high-income census tracts, capturing the magnitude of households that live in economically segregated neighborhoods. A perfectly integrated region with no majority rich or majority poor neighborhoods would have a RISI score of 0, while a region where 100% of wealthy households live in wealthy neighborhoods and 100% of poor households live in poor neighborhoods would have a RISI score of 200.

Nationwide, the Pew Center found that 28% of lower-income households were located in predominantly lower-income neighborhoods in 2010, up from 23% in 1980, and that 18% of upper-income households lived in predominantly upper-income neighborhoods, compared to 9%. The Pew Center applied its analysis to the nation's 30 largest metropolitan areas as of 2010. The Piedmont Triad region ranked outside the scope of Pew's work, so the methodology was replicated using the same data set and research methods.

Applying the same thresholds Pew used in its research allows the Piedmont Triad to be compared to the regions nationwide that Pew studied. Accordingly, lower-income households in the Piedmont Triad were defined as those making less than $27,818, which is two-thirds of the 2010 MHI of the region ($41,727). Upper-income households were defined as those making at least $83,454, which is double the regional MHI. Lower-income neighborhoods were those where at least 50% of households made less than $27,818, and upper-income neighborhoods are those where at least 50% of households made at least $83,454.

According to 2010 American Community Survey data, 29,864 of 175,879 lower-income households across the Piedmont Triad region lived in majority lower-income neighborhoods, a share of 17%. Thirty-seven of the 12-county region's 339 tracts (10.9%) were classified as majority lower-income, and 37 were classified as majority upper-income. Of the region's 132,262 upper-income households, 30,258, or 22.9%, lived in upper-income neighborhoods.

Therefore, the combined RISI score for the Piedmont Triad region in 2010 was **40**, indicating that the region is more economically integrated than the nation overall. While the region's score of 40 represented 28% of lower-income households and 18% of upper-income households being isolated in like neighborhoods, in the Piedmont Triad region, lower-income households (17%) were less likely to be concentrated than upper-income households (22.9%).

Figure 32 : Regional Segregation by Household Income, 2010

	2010 RISI
San Antonio-New Braunfels	63
Houston-Sugar Land-Baytown	61
Dallas-Fort Worth-Arlington	60
New York-Northern New Jersey	57
Denver-Aurora-Broomfield	55
Detroit-Warren-Livonia	54
Columbus	53
Los Angeles-Long Beach-Santa Ana	51
Philadelphia-Camden-Wilmington	51
Miami-Fort Lauderdale-Pompano Beach	49
Baltimore-Towson	48
Phoenix-Mesa-Glendale	48
Kansas City	47
Cincinnati-Middletown	47
Washington-Arlington-Alexandria	47
Cleveland-Elyria-Mentor	46
National	***46***
San Francisco-Oakland-Fremont	43
Atlanta-Sandy Springs-Marietta	41
Chicago-Joliet-Naperville	41
Buffalo-Niagara Falls	40
San Diego-Carlsbad-San Marcos	40
Piedmont Triad	**40**
Riverside-San Bernardino-Ontario	38
Pittsburgh	38
St. Louis	38
Boston-Cambridge-Quincy	36
Sacramento-Arden-Arcade-Roseville	35
Seattle-Tacoma-Bellevue	34
Tampa-St. Petersburg-Clearwater	29
Minneapolis-St. Paul-Bloomington	28
Portland-Vancouver-Hillsboro	25
Orlando-Kissimmee-Sanford	22

Source: Fry, Richard and Taylor, Paul. "The Rise of Residential Segregation by Income." Pew Social and Demographic Trends, Pew Research Center. Released August 1, 2012. Local calculations by M&L.

In 2010, 17% of lower-income households lived in majority lower-income neighborhoods, while 22.9% of upper-income households lived in majority upper-income neighborhoods.

Of the 32 block groups with the highest rates of poverty in the Triad region, 10 are located in central Winston-Salem, 8 are located in central High Point, 10 are located in central Greensboro, and 4 are located in central Lexington.

Block groups with the lowest rates of poverty were dispersed throughout the Triad region, rather than clustered in inner cities.

PATTERNS OF POVERTY

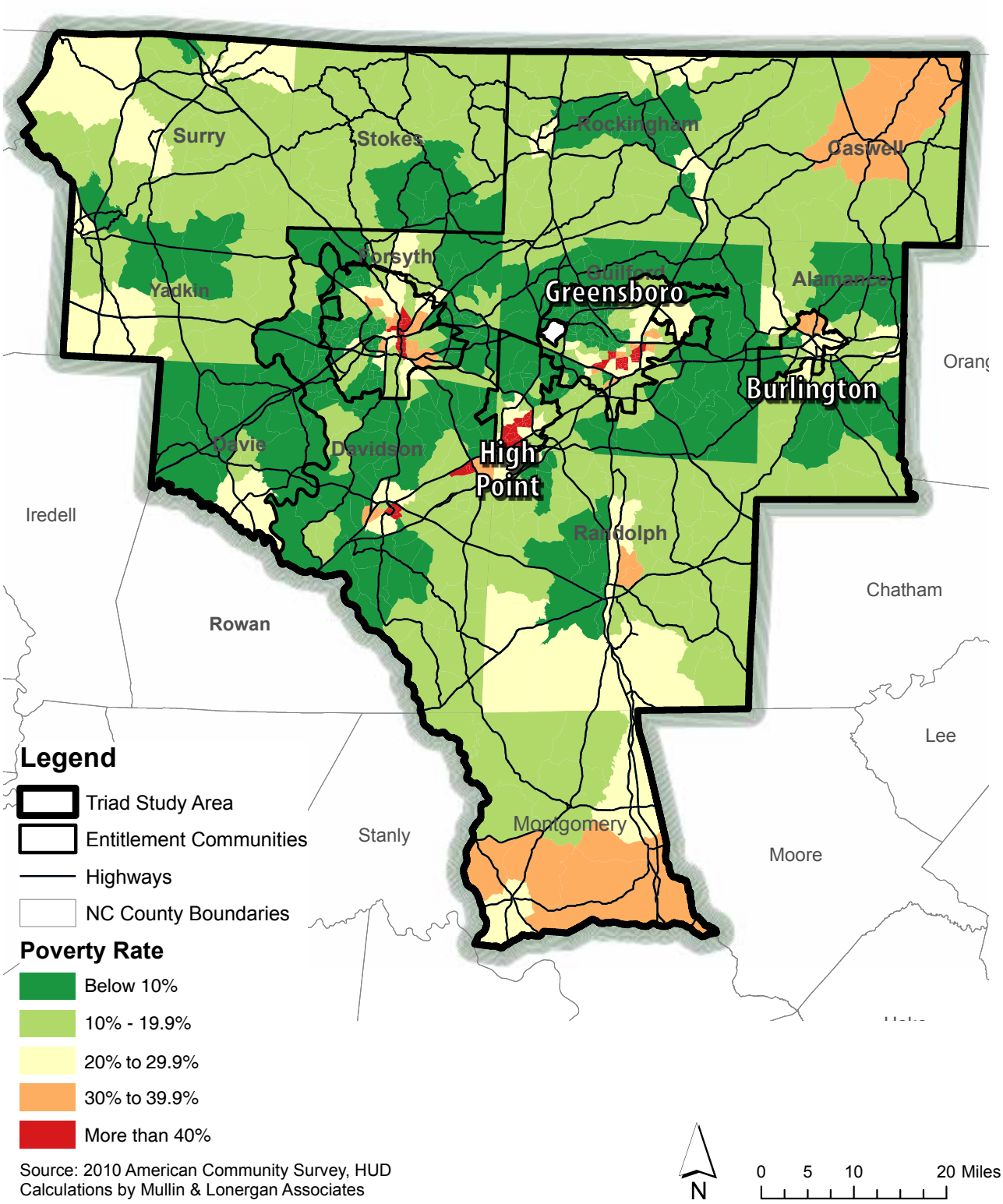
The federal poverty level in 2010 was defined as an annual income of $22,050 for a family of four, or $10,830 for an individual. The overall poverty rate in North Carolina was 17.2%. Household poverty correlates strongly with limitations in housing choice. As demonstrated in previous pages, household poverty also disproportionately affects members of the protected classes in the Piedmont Triad, particularly Black households, Hispanic households, households of persons with disabilities, and female-headed households with children.

The following map illustrates the geographic distribution of poverty by census block group across the region. This map indicates the extent to which poverty is more common within the urban cores of Greensboro, High Point, and Winston-Salem metropolitan areas, as well as several micropolitan areas throughout the region. Of the 32 block groups with the highest rates of poverty in the Triad region, 10 are located in central Winston-Salem, 8 are located in central High Point, 10 are located in central Greensboro, and 4 are located in central Lexington.

Only one out of 32 of these block groups is located adjacent to a low-poverty area. Rather, most high-poverty block groups are located adjacent to other high-poverty block groups. There are also significant areas of rural poverty in northern Caswell County and southern Montgomery County.

Block groups with the lowest rates of poverty were dispersed throughout the region, although block groups with very low rates of poverty were slightly clustered in exurban areas between Greensboro and Winston-Salem, exurbs to the east and west of Winston-Salem, and in several exurban or rural block groups southeast of Greensboro and southwest of Burlington.

MAP 21:
POVERTY RATES BY BLOCK GROUP



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

RCAPs have a slightly higher proportion of residents with college degrees than the Triad region overall.

EMPLOYMENT AND PROTECTED CLASS STATUS

The American Community Survey provides detailed employment data by gender and race, indicating differences in employment rates among groups. According to 2012 estimates for the Piedmont Triad, women experienced unemployment at lower rates than men, with 9.7% of women unemployed, compared to 10.9% of men. Women in the four entitlement communities also experienced lower unemployment rates than men.

White residents were less likely to experience unemployment than Black, Asian, or Hispanic residents. Black residents experienced much higher unemployment rates than Whites (15.6% to 8.7%). With the exception of High Point, where Hispanic residents experienced lower unemployment rates than Whites, White residents experienced lower rates of unemployment than Blacks, Asians, or Hispanics.

The employment composition within RCAPs by sector is relatively similar to the regional economy. However, the proportion of Health Care and Social Assistance jobs in RCAPs was 5.1% lower than the region, the proportion of Retail Trade jobs was 4.4% lower in RCAPs than in the region, and the proportion of Public Administration jobs was 2.8% lower in RCAPs than in the region. These three NAICS codes contain high proportions of jobs with low requirements for entry-level work and a higher potential for upward mobility relative to other fields. Residents in RCAP block groups, who are disproportionately members of the protected classes and also disproportionately affected by a lack of economic opportunity, would benefit from local access to these sectors. Interestingly, RCAPs have a slightly higher proportion of residents with bachelor's degrees than the general population, indicating heterogeneity within these areas, possibly due to proximity to university and college campuses for the RCAPs in Greensboro and Winston-Salem.

Figure 33 : Civilian Labor Force Statistics, 2012

	Region		Burlington		Greensboro		High Point		SHC	
	Total	%	Total	%	Total	%	Total	%	Total	%
Total CLF	823,284	100.0%	25,489	100.0%	141,445	100.0%	53,079	100.0%	96,026	100.0%
Employed	738,469	89.7%	22,753	89.3%	126,912	89.7%	46,983	88.5%	87,022	90.6%
Unemployed	84,815	10.3%	2,736	10.7%	14,533	10.3%	6,096	11.5%	9,004	9.4%
Male CLF	425,879	51.7%	12,303	48.3%	70,860	50.1%	27,216	51.3%	50,269	52.3%
Employed	379,641	89.1%	10,935	88.9%	63,338	89.4%	23,876	87.7%	45,099	89.7%
Unemployed	46,238	10.9%	1,368	11.1%	7,522	10.6%	3,340	12.3%	5,170	10.3%
Female CLF	397,405	48.3%	13,186	51.7%	70,585	49.9%	25,863	48.7%	45,757	47.7%
Employed	358,828	90.3%	11,818	89.6%	63,574	90.1%	23,107	89.3%	41,923	91.6%
Unemployed	38,577	9.7%	1,368	10.4%	7,011	9.9%	2,756	10.7%	3,834	8.4%
White CLF	600,550	72.9%	15,510	60.8%	74,372	52.6%	30,922	58.3%	88,507	92.2%
Employed	548,209	91.3%	14,226	91.7%	69,039	92.8%	28,583	92.4%	80,533	91.0%
Unemployed	52,341	8.7%	1,284	8.3%	5,333	7.2%	2,339	7.6%	7,974	9.0%
Black CLF	171711	20.9%	6742	26.5%	57,348	40.5%	16,915	31.9%	4073	4.2%
Employed	144876	84.4%	5667	84.1%	48,952	85.4%	13,877	82.0%	3655	89.7%
Unemployed	26835	15.6%	1075	15.9%	8,396	14.6%	3,038	18.0%	418	10.3%
Asian CLF	16,727	2.0%	480	1.9%	5,396	3.8%	3,192	6.0%	304	0.3%
Employed	15,094	90.2%	430	89.6%	4,965	92.0%	2,654	83.1%	248	81.6%
Unemployed	1,633	9.8%	50	10.4%	431	8.0%	538	16.9%	56	18.4%
Hispanic CLF	64,794	7.9%	3,380	13.3%	9,391	6.6%	4,397	8.3%	6,145	6.4%
Employed	57,819	89.2%	3,072	90.9%	8,533	90.9%	4,106	93.4%	5,344	87.0%
Unemployed	6,975	10.8%	308	9.1%	858	9.1%	291	6.6%	801	13.0%

Source U.S. Census Bureau, 2008-2012 American Community Survey (S1701, C23002A, C23002B, C23002D, C23002I)

Figure 34 : Employment Comparison between RCAPs and the Region

	RCAPs		Whole Region	
	Count	Share	Count	Share
Total Jobs	32,668	100.0%	666,921	100.0%
Jobs by Worker Age				
Age 29 or younger	5,397	16.5%	136,286	20.4%
Age 30 to 54	19,957	61.1%	395,581	59.3%
Age 55 or older	7,314	22.4%	135,054	20.3%
Jobs by Earnings				
$1,250 per month or less	8,323	25.5%	176,167	26.4%
$1,251 to $3,333 per month	13,745	42.1%	281,034	42.1%
More than $3,333 per month	10,600	32.4%	209,720	31.4%
Jobs by NAICS Industry Sector				
Agriculture, Forestry, Fishing and Hunting	32	0.1%	1,297	0.2%
Mining, Quarrying, and Oil and Gas Extraction	2	0.0%	344	0.1%
Utilities	0	0.0%	1,310	0.2%
Construction	1,480	4.5%	27,505	4.1%
Manufacturing	5,842	17.9%	98,994	14.8%
Wholesale Trade	2,201	6.7%	38,693	5.8%
Retail Trade	2,299	7.0%	76,326	11.4%
Transportation and Warehousing	1,482	4.5%	23,956	3.6%
Information	506	1.5%	8,310	1.2%
Finance and Insurance	2,082	6.4%	27,678	4.2%
Real Estate and Rental and Leasing	376	1.2%	7,142	1.1%
Professional, Scientific, and Technical Services	1,815	5.6%	24,572	3.7%
Management of Companies and Enterprises	514	1.6%	17,456	2.6%
Administration & Support, Waste Management and Remediation	1,806	5.5%	43,802	6.6%
Educational Services	5,708	17.5%	68,590	10.3%
Health Care and Social Assistance	2,966	9.1%	94,583	14.2%
Arts, Entertainment, and Recreation	49	0.1%	7,442	1.1%
Accommodation and Food Services	2,223	6.8%	55,936	8.4%
Other Services (excluding Public Administration)	935	2.9%	17,391	2.6%
Public Administration	350	1.1%	25,594	3.8%
Jobs by Worker Race				
White Alone	21,408	65.5%	508,825	76.3%
Black or African American Alone	9,914	30.3%	135,639	20.3%
American Indian or Alaska Native Alone	218	0.7%	3,079	0.5%
Asian Alone	859	2.6%	13,880	2.1%
Native Hawaiian or Other Pacific Islander Alone	23	0.1%	466	0.1%
Two or More Race Groups	246	0.8%	5,032	0.8%
Jobs by Worker Ethnicity				
Not Hispanic or Latino	31,377	96.0%	634,740	95.2%
Hispanic or Latino	1,291	4.0%	32,181	4.8%
Jobs by Worker Educational Attainment				
Less than high school	3,406	10.4%	65,237	9.8%
High school or equivalent, no college	8,682	26.6%	167,595	25.1%
Some college or Associate degree	8,733	26.7%	171,696	25.7%
Bachelor's degree or advanced degree	6,450	19.7%	126,107	18.9%
Educational attainment not available (workers aged 29 or younger)	5,397	16.5%	136,286	20.4%
Jobs by Worker Sex				
Male	17,093	52.3%	321,497	48.2%
Female	15,575	47.7%	345,424	51.8%

Source: Center for Economic Studies, U.S. Census Bureau

Although many RCAP residents work in central business districts, which are served by public transportation, there are also a significant number of RCAP residents in the Triad commuting to jobs scattered along highway corridors in remote exurban areas.

Because a higher proportion of residents in RCAPs rely on public transportation, job locations relative to transit accessibility play a role in the fair housing environment. The following map displays the addresses of workplaces for RCAP residents in the Piedmont Triad region. Although many RCAP residents work in central business districts, which are served by public transportation, there is also a significant number of RCAP residents in the Triad commuting to jobs scattered along highway corridors in remote exurban areas. Large clusters of jobs located in the same block group suggest that many of the remote jobs are in exurban office parks, strip malls, or other exurban employment concentrations. These areas are poorly served by public transportation.

A significant number of RCAP residents commute outside of the Piedmont Triad into Charlotte for work. Even for residents of the nearby Lexington RCAP cluster, this is a one-way commute distance of over 50 miles.

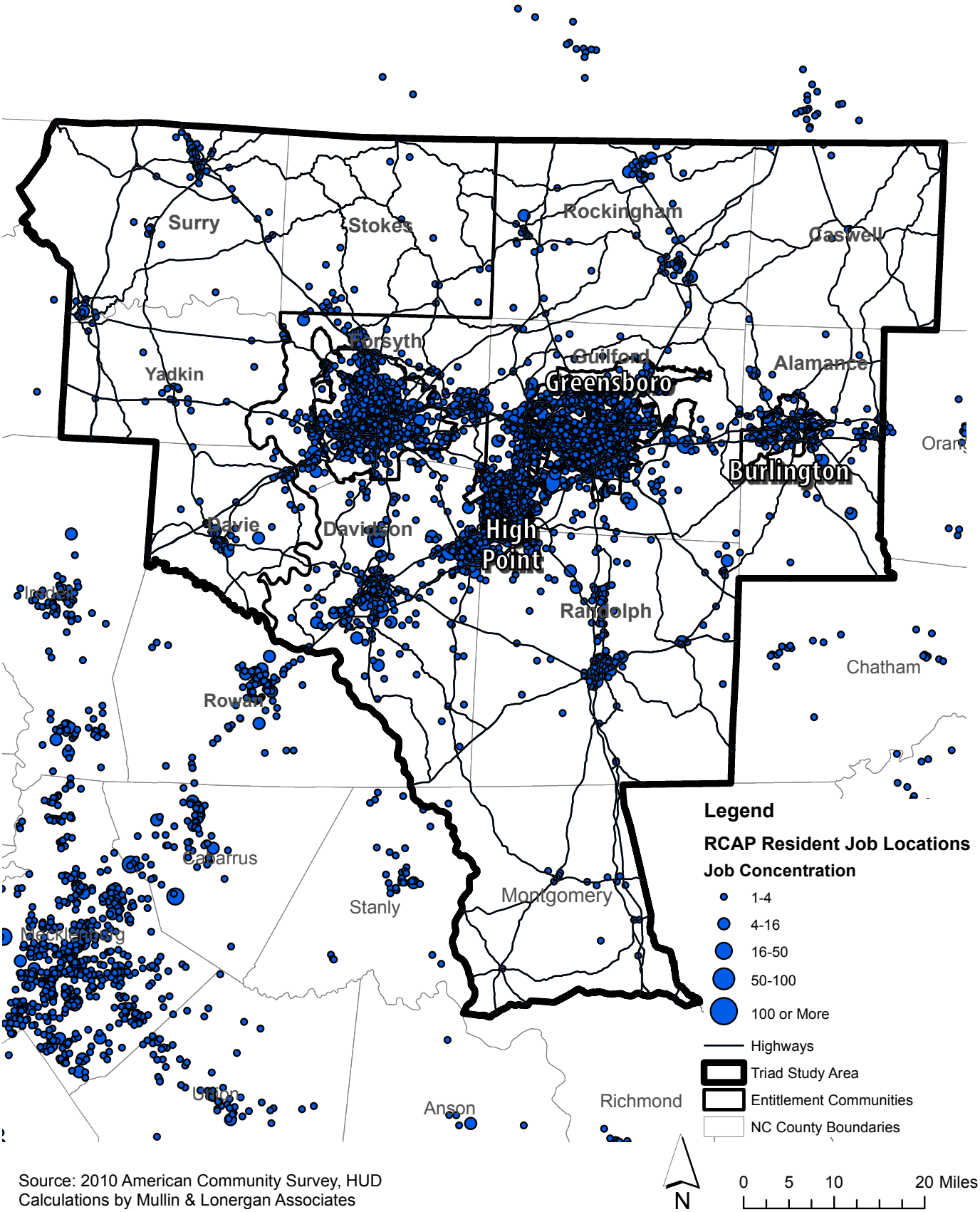
Figure 35 : Employment Comparison between RCAPs and the Region

	RCAPs		Whole Region	
	Count	Share	Count	Share
Total jobs	18,821	100.0%	674,607	100.0%
Less than 10 miles	8,513	45.2%	292,148	43.3%
10 to 24 miles	3,387	18.0%	180,728	26.8%
25 to 50 miles	1,484	7.9%	76,195	11.3%
Greater than 50 miles	5,437	28.9%	125,536	18.6%

Source: Center for Economic Studies, U.S. Census Bureau

Residents in racially concentrated areas of poverty have longer commutes on average than the region as a whole. The percentage of RCAP residents who had to travel 50 or more miles to work was 28.9% in 2010, compared to 18.6% of workers within the entire region.

MAP 22:
RCAP RESIDENT COMMUTING DESTINATIONS



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

DISTRIBUTION OF NEIGHBORHOOD OPPORTUNITY

One effect of sprawl across metropolitan regions has been the geographic dilution of jobs and amenities, typically in a way that isolates lower-income minorities living in urban core areas from employment and housing opportunities in outlying suburbs. The expansion of low-density development beyond urban fringes exacerbates residential segregation as White residents, whose typically higher incomes correlate with a greater array of housing choices, move farther into more sparsely populated areas with lower taxes and lower service needs, abandoning the existing housing stock and leaving behind a lower-income population that consists disproportionately of racial and ethnic minorities.

A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for Black and Hispanic families, which are commonly concentrated in "at-risk, segregated communities characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools." Households living in lower-income areas of racial and ethnic concentration face fewer opportunities in education, wealth acquisition, and employment prospects.

To describe the variation in neighborhood opportunity across metropolitan regions, HUD has adopted a "Communities of Opportunity" model based on research developed by the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University. "Communities of Opportunity" is a fair housing and community development framework that assigns each neighborhood a score reflecting the degree to which its residents have access to determinants of positive life outcomes, such as good schools, jobs, stable housing, transit, the absence of crime, and fewer health hazards. HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of this exercise are to bring opportunities to opportunity-deprived areas and to connect people to existing opportunities throughout the metropolitan region. The Institute has argued that "we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in 'free market' opportunities."

The Communities of Opportunity model is highly spatial and is therefore map-based, representing the geographic footprint of inequality. The process of creating opportunity maps involves building a set of potential indicators of high and low opportunity, reflecting local issues as well as research literature validating connections between indicators and opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (education, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity "comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not; and to understand what needs to be remedied in opportunity-poor communities."

HUD adapted the model to calculate opportunity index scores for each census block group on six separate dimensions: neighborhood school proficiency, labor market engagement, poverty, job accessibility, health hazards exposure, and transit access. Each dimension includes a collection of variables describing conditions for each census block group in the region:

- **Neighborhood School Proficiency** uses school-level data on the performance of elementary students on state exams as a proxy for educational quality. Schools were associated with block groups using School Attendance Boundary Information Systems (SABINS). In block groups with multiple school matches, enrollment was divided according to a weighted score

- **Labor Market Engagement** measures the level of employment, labor force participation, and educational attainment in each neighborhood to describe its local human capital

- **Prosperity** includes rates of family poverty and the receipt of public assistance (cash welfare, such as Temporary Assistance to Needy Families) to capture the depth and intensity of a given neighborhood's poverty

- **Job Access** gives each neighborhood a score based on distance to all job locations, weighting larger employment centers more heavily. The distance from any single job location was positively weighted by the number of job opportunities at that location and inversely weighted by the labor supply (competition) of the location

- **Environmental Health Hazard Exposure** for a given block group was calculated as a function of the volume of toxic industrial releases from the EPA's Toxic Release Inventory, the EPA toxicity assessment of the released chemicals, and the distance of residential locations from toxic release facilities

- **Transit Access** was calculated for each block group as a composite index of variables such as proximity to local bus stops, proximity to regional bus stops, access to park and ride lots, and access to light rail

The score each block group received for each of these six dimensions represents a standardized combination of variables, using 100 as the highest possible score and zero as the lowest. No weighting (giving one index variable more relative importance over another) was used, as there is no proven methodological basis for assigning arbitrary value to any given variable.

The following pages include a series of maps explained individually, then combined to illustrate comprehensive opportunity and compare it to other descriptive characteristics of the Piedmont Triad communities and their residents.

School Proficiency

With only one exception, block groups with high Black and Hispanic concentrations have less proficient schools.

The highest-scoring schools in the Triad are predominantly in suburban, newly exurban, and rural areas of the Piedmont Triad region. The lowest-performing schools are found within the inner cities of Greensboro, High Point, Winston-Salem, Burlington, and Thomasville. These areas with low-performing schools are predominantly in the same block groups classified as RCAPs or near-RCAPs. Greensboro, notably, has a bimodal distribution: there are a high number of low-proficiency schools as well as a significant number of high-proficiency schools. Some of these high and very high-proficiency schools are located within the downtown area, accounting for the higher average opportunity score in block groups with transit stops. This may be the result of magnet schools in the area. While many provide some access to proficient schools in Greensboro and Winston-Salem, the smaller cities of Burlington, Lexington, High Point, Thomasville, and Asheboro do not have high-proficiency schools near transportation. Even in the larger cities, high-proficiency schools and RCAPs are clustered on opposite sides of the city, with the high-proficiency schools in block groups to the northwest and the RCAP block groups predominantly in southeast and south-central Greensboro and east Winston-Salem.

With the exception of a Hispanic concentration located in a high-proficiency school district in southern Surry County, block groups with high Black and Hispanic concentrations consistently have less proficient schools. Areas with highly proficient schools are almost exclusively located in White block groups. Only three block groups (two located in northeastern Greensboro, one in southern Yadkin County) contain both a highly proficient school system and a median gross rent below $500 monthly.

The highest level of school proficiency accessible through public transportation is "moderate": areas with high public transportation rankings reciprocally have poor schools. Within the current built environment, minority residents (particularly Blacks, and to a lesser degree Hispanics and Asians) have limited access to high-proficiency schools in the Piedmont Triad. Persons with disabilities who may have limited access to public transportation services also have limited access to high-proficiency schools. While schools may have a supplementary bus system for children, a household with one disabled adult may be forced to live in an area with public transportation, effectively limiting choice of school for any children in the household as well. There are extremely limited options available for low rents and high-proficiency schools.

The neighborhood school proficiency index uses school-level data on the performance of students on state exams to describe which neighborhoods have high-performing elementary schools and which have lower performing elementary schools. The proficiency index is a function of the percent of elementary school students proficient in reading and math on state test scores. Elementary schools are linked with block-groups based on mapping of attendance area zones from School Attendance Boundary Information System (SABINS), where available, or within-district proximity matches of up to the four-closest schools within a mile. In cases with multiple school matches, an enrollment-weighted score is calculated following the equation above.[1] The highest possible score is 100 and the lowest possible score is zero.

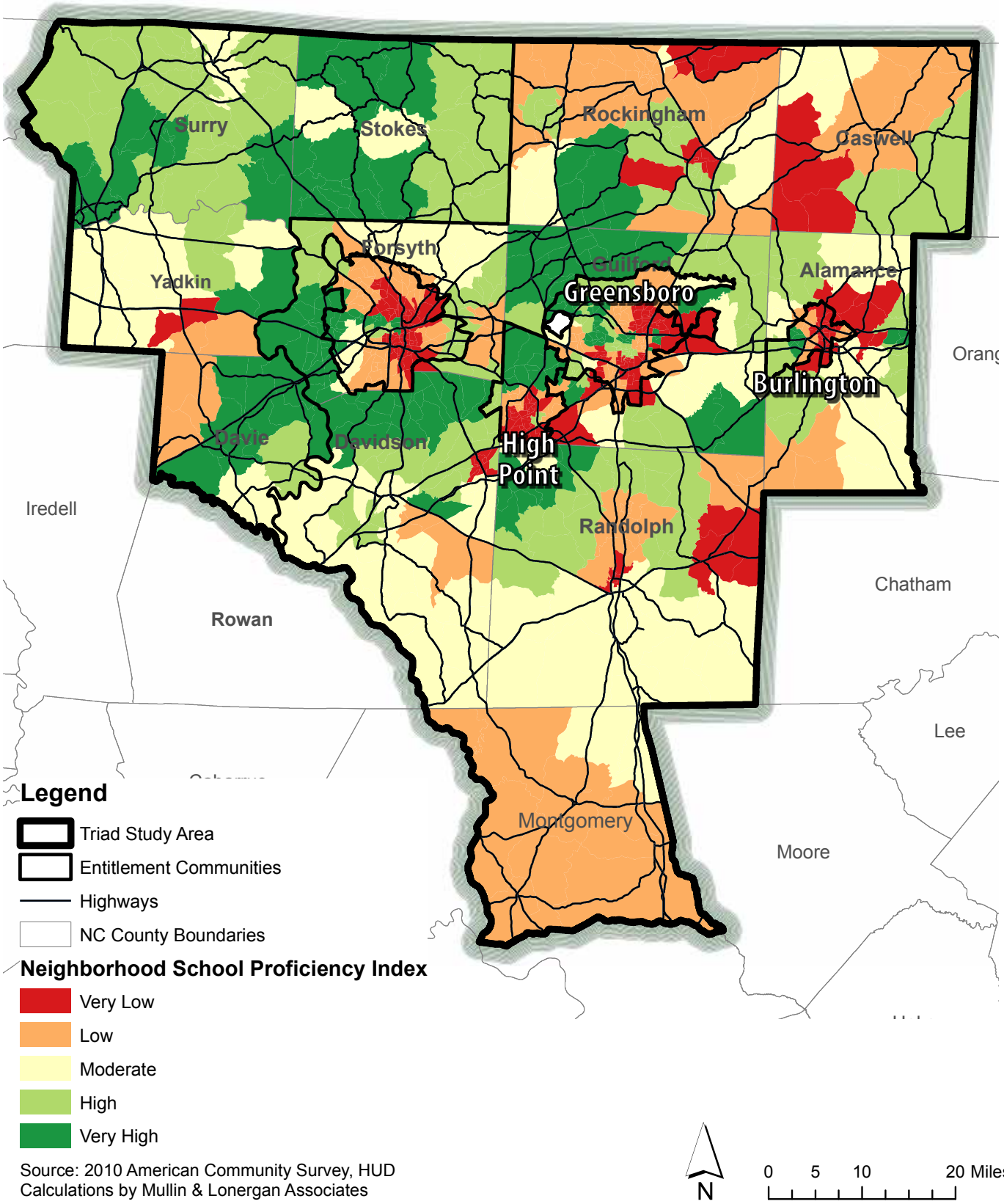
1 HUD FHEA Technical Documentation Notes

Figure 36 : Opportunity Scores Cross-Tabulations: School Proficiency Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093	11	99	29.8
Burlington	44	1	87	29.1
Greensboro	174	1	98	42.2
High Point	67	2	94.5	32.8
Surry County HOME Consortium	143	1	94.5	66.3
Block Groups containing areas with Median Rent <$500	130	1	97	41.6
RCAPs	56	2	97	18.4
Near-RCAPs	62	1	91	20.6
Block Groups with Percent Black 10% Above Mean	186	1	91	21
Block Groups with Percent Hispanic 10% Above Mean	104	1	91	25
Block Groups with Percent Asian 10% Above Mean	18	1	93.5	25.5
Block Groups Served by a Transit Stop	42	1	97	48.4

Source: U.S. Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

MAP 23:
NEIGHBORHOOD SCHOOL PROFICIENCY INDEX



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

Blacks, Hispanics, and Asians tend to live disproportionately in areas where the population is less educated and less engaged in the labor force.

Labor Market Engagement

The labor market engagement index provides a summary description of the relative intensity of general market engagement and human capital in a neighborhood. The lowest levels of labor market engagement are within either inner city or rural areas. Most low values are clustered just outside urban cores and generally overlapping with RCAP and near-RCAP block groups: the 38.7% difference in labor force engagement between RCAP areas and the region as a whole shows a marked difference in the distribution of opportunity. Block groups with a high Black population had 19.1% lower average index values than the region as a whole, areas with high Hispanic populations had average index values 12.8% lower than the region, and areas with high Asian populations had average index values 8.3% lower. This means that Blacks, Hispanics, and Asians tend to live disproportionately in areas where the population is less educated and less engaged in the labor force.

Low labor market engagement values are also found in rural Stokes, Rockingham, Caswell, and Yadkin Counties. These areas are largely White, and most areas suffer from economic stagnation and high unemployment. Stakeholder interviews revealed that agricultural activities (such as tobacco farming) and some rural industrial activities (such as poultry processing) had left the region within the past decades due to a lack of competitive advantage, with no new industry coming to replace it. These low labor market engagement scores may signify the effects of these economic shifts in the Triad's rural areas.

Contrasting this, Greensboro's labor market engagement indices are much higher than High Point, Burlington, or the Surry HOME Consortium, suggesting a higher average level of human capital and a more skilled workforce. The Triad's urban areas contain both the lowest and highest labor market engagement index values, with bimodal distributions in the bottom decile and around the 80-percent decile.

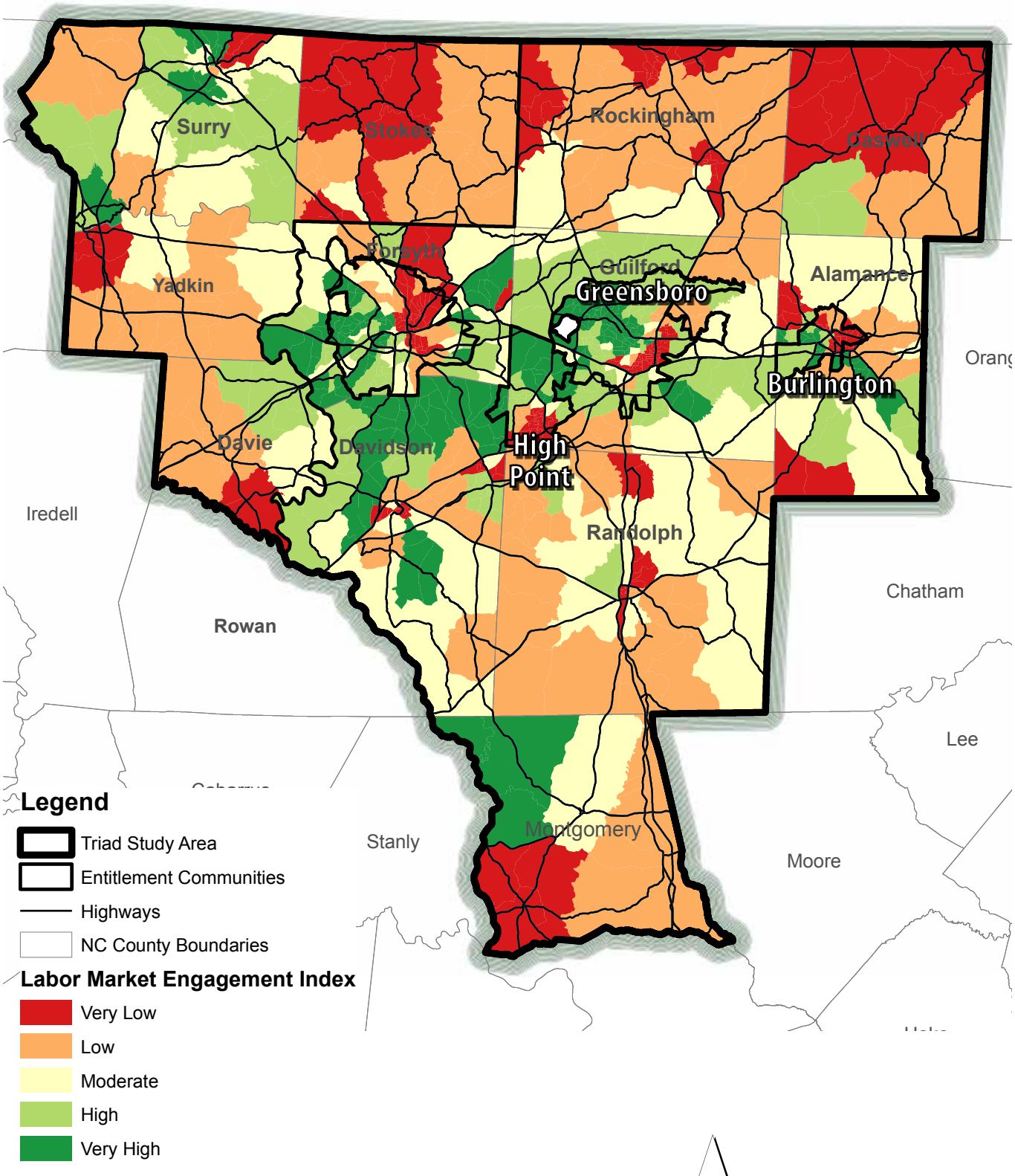
The highest possible score for labor market engagement is 100 and the lowest possible score is zero. This is based upon the level of employment, labor force participation, and educational attainment in that neighborhood. Areas with high labor market engagement index values have high levels of human capital, low unemployment rates, and are less likely to have problems engaging in the workforce.

Figure 37 : Opportunity Scores Cross-Tabulations: Labor Market Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093			
Burlington	44	3	93	46.4
Greensboro	174	1	100	61.6
High Point	67	1	99	43.5
Surry County HOME Consortium	143	7	90	44.9
Block Groups containing areas with Median Rent <$500	130	1	97	41.6
RCAPs	56	1	41	7.7
Near-RCAPs	62	1	92	21.6
Block Groups with Percent Black 10% Above Mean	186	1	91	27.1
Block Groups with Percent Hispanic 10% Above Mean	104	1	85	33.6
Block Groups with Percent Asian 10% Above Mean	18	4	97	38.1
Block Groups Served by a Transit Stop	42	4	99	53.4

Source: US Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

MAP 24:
LABOR MARKET ENGAGEMENT INDEX



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

Prosperity

Areas with blacks, Hispanic, and Asian concentrations had higher than average poverty rates in RCAPs and near-RCAPs

The prosperity index is intended to capture the depth and intensity of poverty in a given neighborhood. The highest possible score is 100 and the lowest possible score is zero. The standard deviation of the index, which ranges from 1 to 100, was 29.2, indicating that the depth and intensity of poverty is more evenly distributed than may be perceived. A histogram of poverty index values, for example, would look more flat than "bell-shaped". However, poverty still disproportionately affects urban areas. Critically high-poverty areas include east Greensboro, most of High Point, east Burlington, Yanceyville, Lexington, the block groups in and around Denton in Davidson County, and the rural areas east of Troy in Montgomery County.

Rural counties had consistently low-to-moderate index values except for a few key outliers. This includes key transitioning areas such as Mt. Airy and northeast Surry County, and southeast Stokes County near King.

Areas of the Triad with Black, Hispanic, and Asian concentrations had higher average poverty index values regardless of whether or not they were located in a RCAP or near-RCAP. Out of the four geographies detailed in the table, Burlington had the highest rates of poverty, with index values 16.2% lower than the regional average. This is noteworthy because Burlington does not have any RCAP areas under any of the definitions provided by HUD. However, the problem of poverty may be most acute, although less concentrated and correlated with racial or ethnic concentration, in Burlington than in the other Piedmont cities.

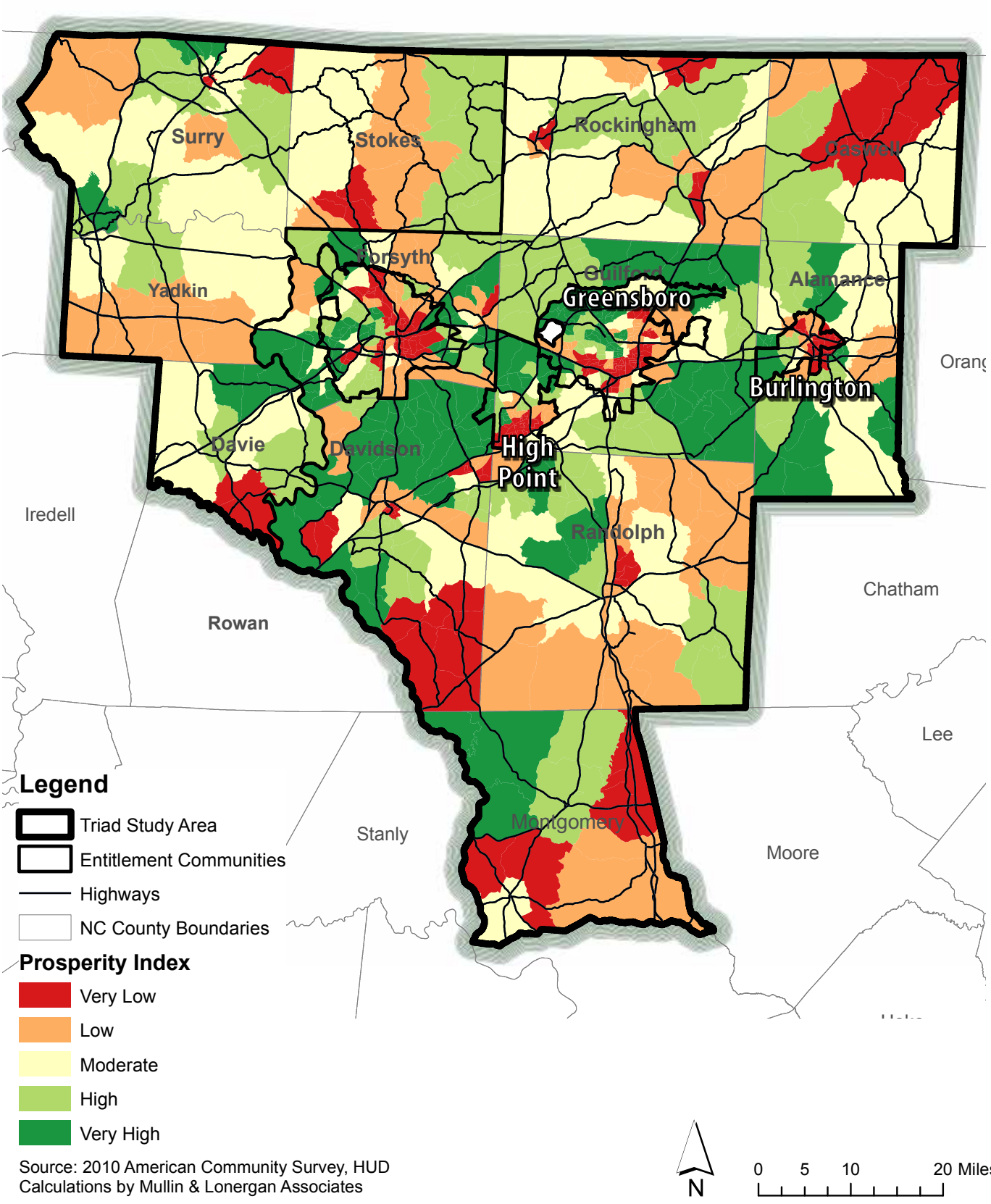
The prosperity index uses family poverty rates and public assistance receipts in order to assess the geographic distribution of poverty. It is a simple vector using the family poverty rate and the percentage of households receiving public assistance.

Figure 38 : Opportunity Scores Cross-Tabulations: Prosperity Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093	1	100	51
Burlington	44	1	96	34.8
Greensboro	174	1	100	50
High Point	67	3	100	44.7
Surry County HOME Consortium	143	3	99	51.5
Block Groups containing areas with Median Rent <$500	130	1	99	43.6
RCAPs	56	1	67	5.28
Near-RCAPs	62	3	58	16
Block Groups with Percent Black 10% Above Mean	186	1	97	23.6
Block Groups with Percent Hispanic 10% Above Mean	104	1	98	26.2
Block Groups with Percent Asian 10% Above Mean	18	3	91	38.7
Block Groups Served by a Transit Stop	42	1	98	52.3

Source: US Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

MAP 25: PROSPERITY INDEX



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

Low income residents who need affordable housing may be forced to live in areas where finding a job is difficult or time-consuming.

Job Access

Limited access to jobs is primarily a rural problem, owing to the scattered and limited job opportunities in the Piedmont Triad's rural areas. The lowest job access values are relatively dispersed around the region, although Montgomery County and Davie County have particularly good access to jobs given their disproportionately rural nature. This is likely due to the low labor supply, which reduces labor competition for residents, rather than the number of accessible jobs.

High Point has particularly good job accessibility. Areas with Asian and Hispanic concentrations actually have better-than-average job accessibility scores than the region as a whole. One possible explanation provided by informed stakeholders is that, because the majority of Asian and Hispanic residents are new arrivals in the region, they have been able to intentionally move into the current high-access areas in order to be close to jobs.

Areas with high job access may have been the primary draw for these residents in the first place. This would explain the difference between these two minority groups and Blacks, who have lived in the region since its inception.

Areas that are affordable have significantly lower job access index values than the general region. This signifies that low-income residents who need affordable housing may have to live in areas where finding a job is difficult and many jobs involve long, time-consuming commutes. Urban areas with good job access were often served by public transit of some kind, although not in the Triad's smaller cities.

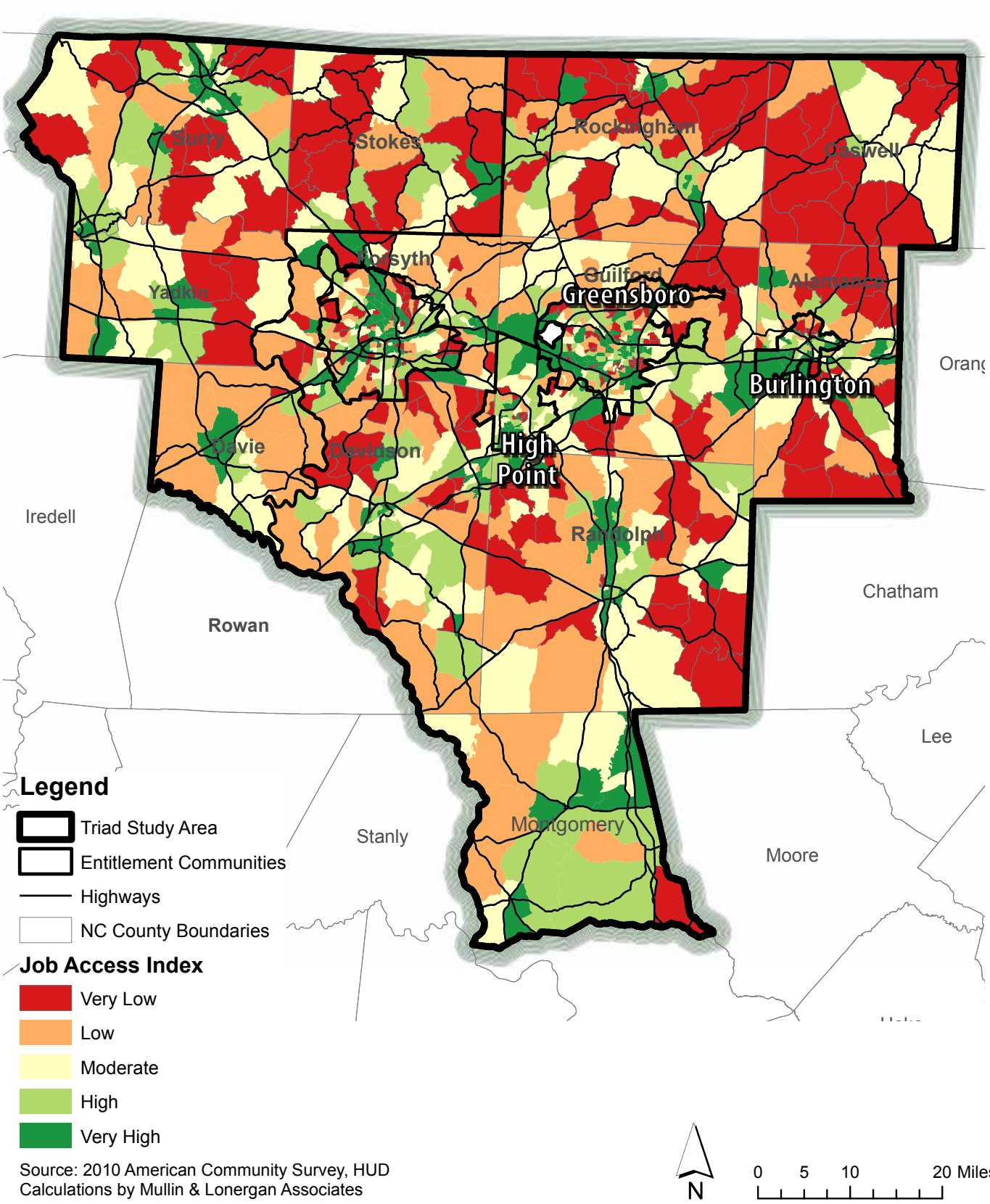
The job access index assigns ratings of a given residential neighborhood as a function of its distance to all job locations, with distance to larger employment centers weighted more heavily. The index utilizes a gravity model where the accessibility of a given residential block-group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. As distance from a job increases, the job opportunity is "discounted" because it becomes more difficult to access that job. This discount factor is estimated parametrically by modeling the observed commute patterns in a region.

Figure 39 : Opportunity Scores Cross-Tabulations: Job Access Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093	1	100	49.8
Burlington	44	4	100	60.2
Greensboro	174	1	100	53.8
High Point	67	1	100	57.8
Surry County HOME Consortium	143	1	99	47.1
Block Groups containing areas with Median Rent <$500	130	1	99	47.1
RCAPs	56	1	98	58
Near-RCAPs	62	1	100	52.2
Block Groups with Percent Black 10% Above Mean	186	1	99	48
Block Groups with Percent Hispanic 10% Above Mean	104	1	97	56.8
Block Groups with Percent Asian 10% Above Mean	18	6	99	54.3
Block Groups Served by a Transit Stop	42	6	100	77.9

Source: US Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

MAP 26:
JOB ACCESS INDEX



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

Health hazard exposure levels are high enough to constitute a severe problem in only two areas of the region.

Environmental Hazards Exposure

The Piedmont Triad region is fortunate to have a generally low level of exposure to health hazards. There are only two areas where health hazard exposure constitutes a severe problem. One of the high-exposure sites is in Dobson, Surry County, and the other is in Central Greensboro. The Surry County site is an outlier and may be the result of a single plant or industrial site. As seen in the following map, the area of the hazardous location in Greensboro overlaps with several of the city's RCAP areas. Minorities and low-income residents are disproportionately affected by this high rate of health hazard exposure in Greensboro. This may pose a social justice issue and should be investigated further.

The health hazards exposure index summarizes potential exposure to harmful toxins at a neighborhood level. The potential health hazards exposure is modeled in a given block group as a function of the volume of toxic industrial releases from the EPA's Toxic Release Inventory, the EPA toxicity assessment of the release chemicals, and the distance to the toxic release facility. Areas with high exposure to toxins are disproportionately affected by health problems such as asthma, certain cancers, birth defects, developmental disabilities in children, and many chronic diseases.

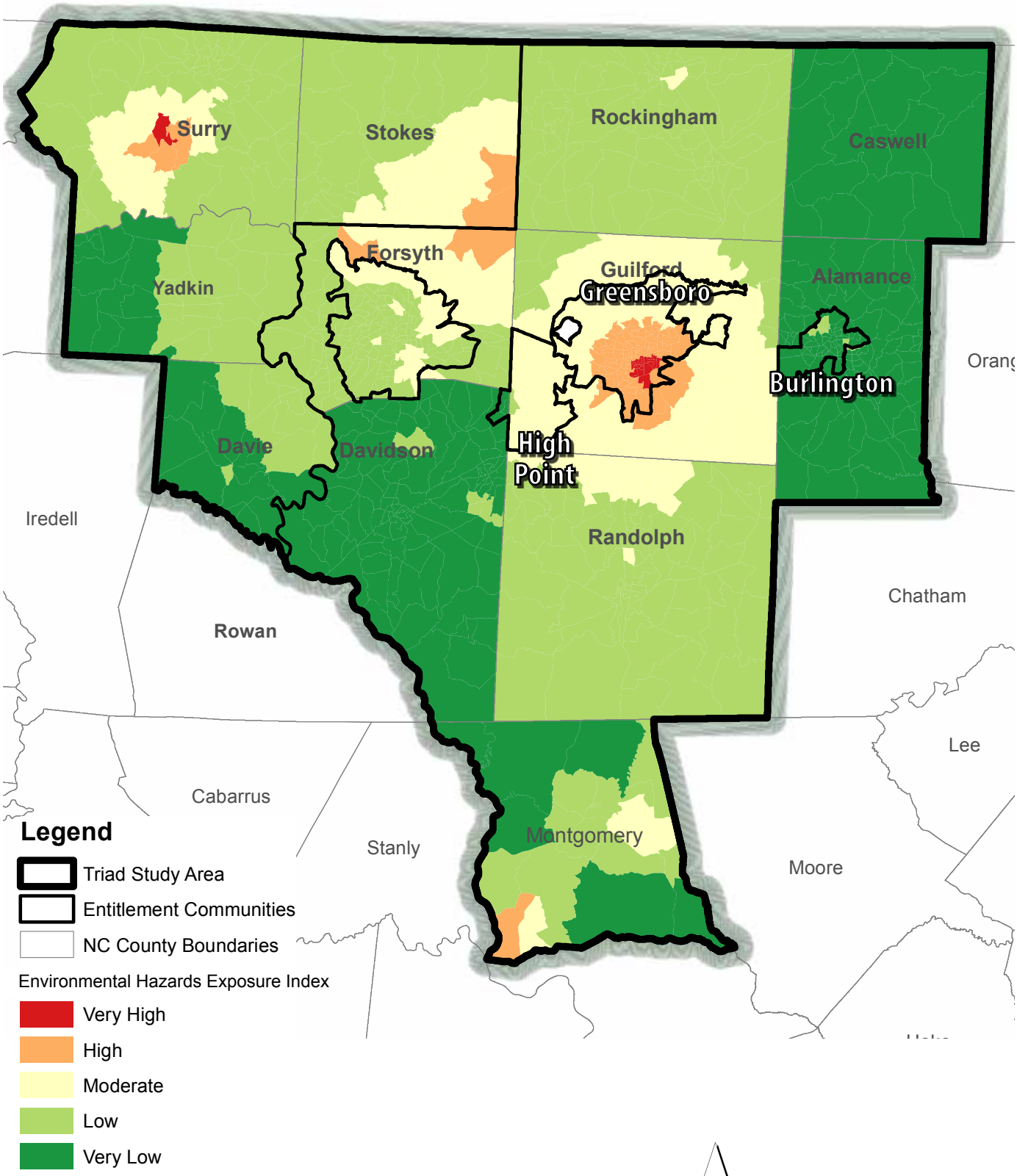
The high health hazard area in Stokes County that spills into Forsyth County is coal combustion waste from the Belews Creek Power Plant. The high score in Surry County is due to hazard exposure issues at the Weyerhaeuser-Elkin facility. The high score in Greensboro is unknown, but is thought to be related to the Horsepen Creek wastewater treatment plant, which an environmental impact assessment recently found to have adverse environmental impacts on air and water.

Figure 40 : Opportunity Scores Cross-Tabulations: Environmental Hazards Exposure Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093	1	97	72.6
Burlington	44	77	94	87.3
Greensboro	174	1	67	46.3
High Point	67	56	95	67.9
Surry County HOME Consortium	143	5	86	76.3
Block Groups containing areas with Median Rent <$500	130	1	97	72.6
RCAPs	56	1	92	54.3
Near-RCAPs	62	35	94	74.3
Block Groups with Percent Black 10% Above Mean	186	1	96	60.1
Block Groups with Percent Hispanic 10% Above Mean	104	5	94	71.6
Block Groups with Percent Asian 10% Above Mean	18	33	91	56.5
Block Groups Served by a Transit Stop	42	33	94	71

Source: US Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

MAP 27:
ENVIRONMENTAL HAZARDS EXPOSURE INDEX



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

Transit Access

Public transit service is very limited outside Greensboro, High Point, and Winston-Salem, although PART and YVEDDI offer regional service along some corridors.

Inner cities have the highest access to transit due to their proximity to bus lines. RCAPs, near-RCAPs, and high-minority areas had much better access to transit than the region as a whole, largely due to their concentration in inner cities. The lowest-scoring city was Burlington, which lacks its own bus system.[1] Given the influx of new migrants and high poverty rates in Burlington, this lack of transit access is problematic.

Most of the Piedmont Triad has very poor access to public transportation due to its large geographic area. The Surry HOME Consortium has particularly poor access to transit, given its rural nature, except in Mt. Airy where the presence of the PART and YVEDDI systems raise the index values.

The transit access index summarizes the accessibility and usefulness of connections to public transit in a block group. It is a composite index of variables such as proximity to local bus stops, proximity to regional bus stops, access to park and ride lots, and access to light rail. Local bus stop access was given a higher priority than regional busses or light rail due to its higher importance for both community and economic development and fair housing accessibility.

Service in the region is provided by the Greensboro Transit Authority, the Winston-Salem Transit Authority, the Lexington Circulator Loop, and Piedmont Authority Regional Transit (PART), and YVEDDI Public Transportation. The City of Burlington is served minimally by the Elon University Biobus.

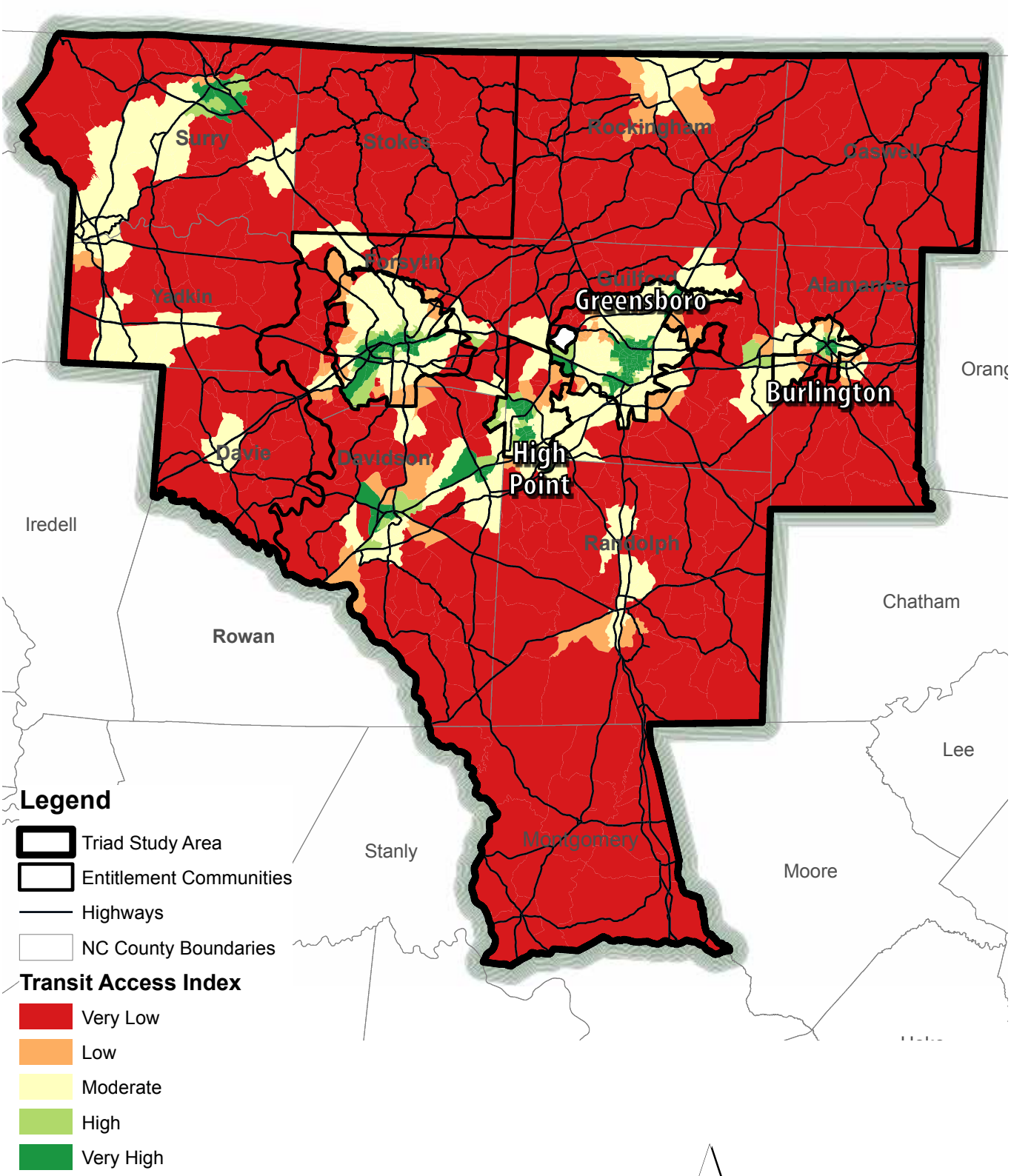
Figure 41 : Opportunity Scores Cross-Tabulations: Transit Access Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093	1	100	27.4
Burlington	44	1	100	42.2
Greensboro	174	1	100	49.6
High Point	67	1	100	48.6
Surry County HOME Consortium	143	1	80	12.1
Block Groups containing areas with Median Rent <$500	130	1	100	28.4
RCAPs	56	40	100	62.5
Near-RCAPs	62	1	80	42.9
Block Groups with Percent Black 10% Above Mean	186	1	100	44.8
Block Groups with Percent Hispanic 10% Above Mean	104	1	100	38.2
Block Groups with Percent Asian 10% Above Mean	18	20	80	48.8
Block Groups Served by a Transit Stop	42	40	100	65.2

Source: US Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

1 On June 17, 2014, City Council approved the establishment of a public transit system in Burlington.

MAP 28:
TRANSIT ACCESS INDEX



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

Comprehensive Opportunity

The following maps compile all the opportunity index scores into a single composite score. This means that scores for the wide cross-section of variables used in the preceding maps were added together into a single score. This score is designed to represent a broad quantitative approximation of opportunity. Minority populations are displayed using dot density. The opportunity maps reveal critical differences in access to high opportunity areas. Several key observations can be made from examining the final map and scores:

Blacks, Hispanics, and Asians tend to live in areas where the composite opportunity score is lower - except in Greensboro where a Black middle class has emerged.

- The highest-opportunity areas are almost exclusively in suburban or exurban locations, with the exception of part of Greensboro.
- The urban growth of Winston-Salem and Greensboro is creating new high-opportunity bedroom communities in comparatively rural areas such as Surry County.
- Blacks, Hispanics, and Asians tend to live in areas where the mean composite opportunity index score is lower. Inversely, minorities tend not to live in areas with high opportunity scores. This may signify an implicit or indirect restriction on housing choice, a key fair housing issue.
- Some block groups with a high Black concentration are located in high-opportunity areas. This signifies a small but distinct Black middle class within the Piedmont Triad, specifically in and around Greensboro. Areas with high Hispanic and Asian concentrations, however, are almost exclusively located in low-opportunity areas. This signifies a lack of this minority middle class in other racial and ethnic groups.
- High-opportunity areas are generally not accessible by public transit. This poses a problem for persons with disabilities or low-income residents who do not have regular access to a vehicle.
- Blacks and Hispanics in Burlington disproportionately live in the low-opportunity area of the city. Job access and transit access are particularly limited in this area, and minorities are disproportionately affected by these low opportunity scores.
- Block groups with a near-RCAP status have only a slightly better composite opportunity index score than RCAPs. This indicates that, although most RCAPs are low-opportunity areas, there are many additional low-opportunity areas that are not RCAPs.
- Rural opportunity is lowest on the Piedmont Triad's Virginia border, in Stokes, Rockingham, and Caswell Counties. Minorities living in these areas disproportionately live in the rural areas.

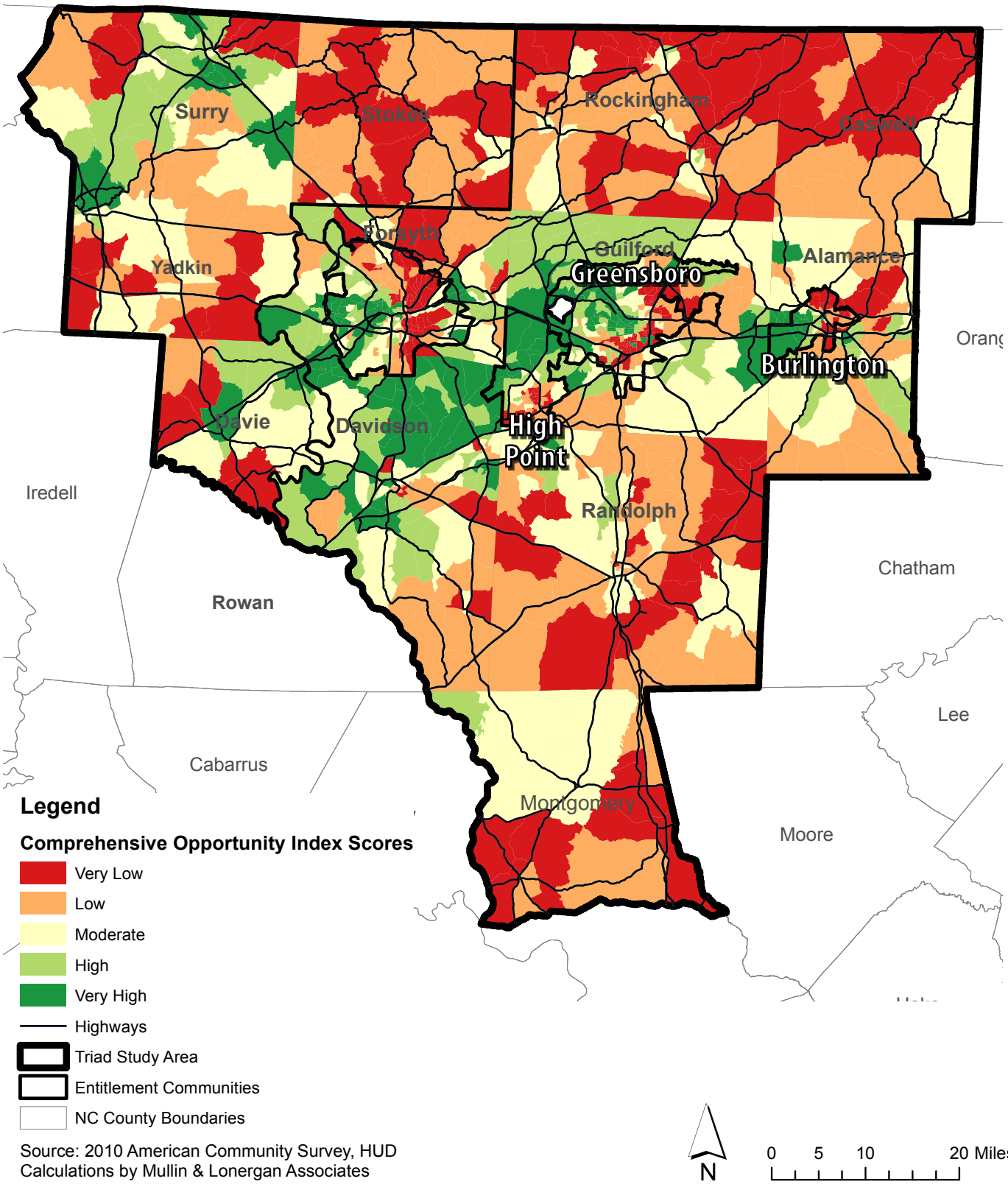
The final map displays block groups that have both a composite opportunity score of 70 or greater, are within or near existing utility and sewer infrastructure, and have parcels currently zoned for residential use within them. These block groups are prime areas for the development of affordable housing, as there is very little overlap between high-opportunity areas and affordable areas within the Triad. These areas are prime locations for new affordable housing projects, and should be seriously considered for public policy and investment decisions.

Figure 42 : Opportunity Scores Cross-Tabulations: Comprehensive Index

Area	Count in Region	Low	High	Mean Opportunity Score
Region	1093	11	99	29.8
Burlington	44	17	48	29.6
Greensboro	174	11	99	32.4
High Point	67	11	47	29.1
Surry County HOME Consortium	143	17	47	29.4
Block Groups containing areas with Median Rent <$500	130	11	86	28.1
RCAPs	56	11	90	23.1
Near-RCAPs	62	13	37	22.2
Percent Black 10% Above Mean	186	11	99	24.2
Percent Hispanic 10% Above Mean	104	13	41	24.7
Percent Asian 10% Above Mean	18	16	47	25.8
Served by a Transit Stop	42	17	53	36.3

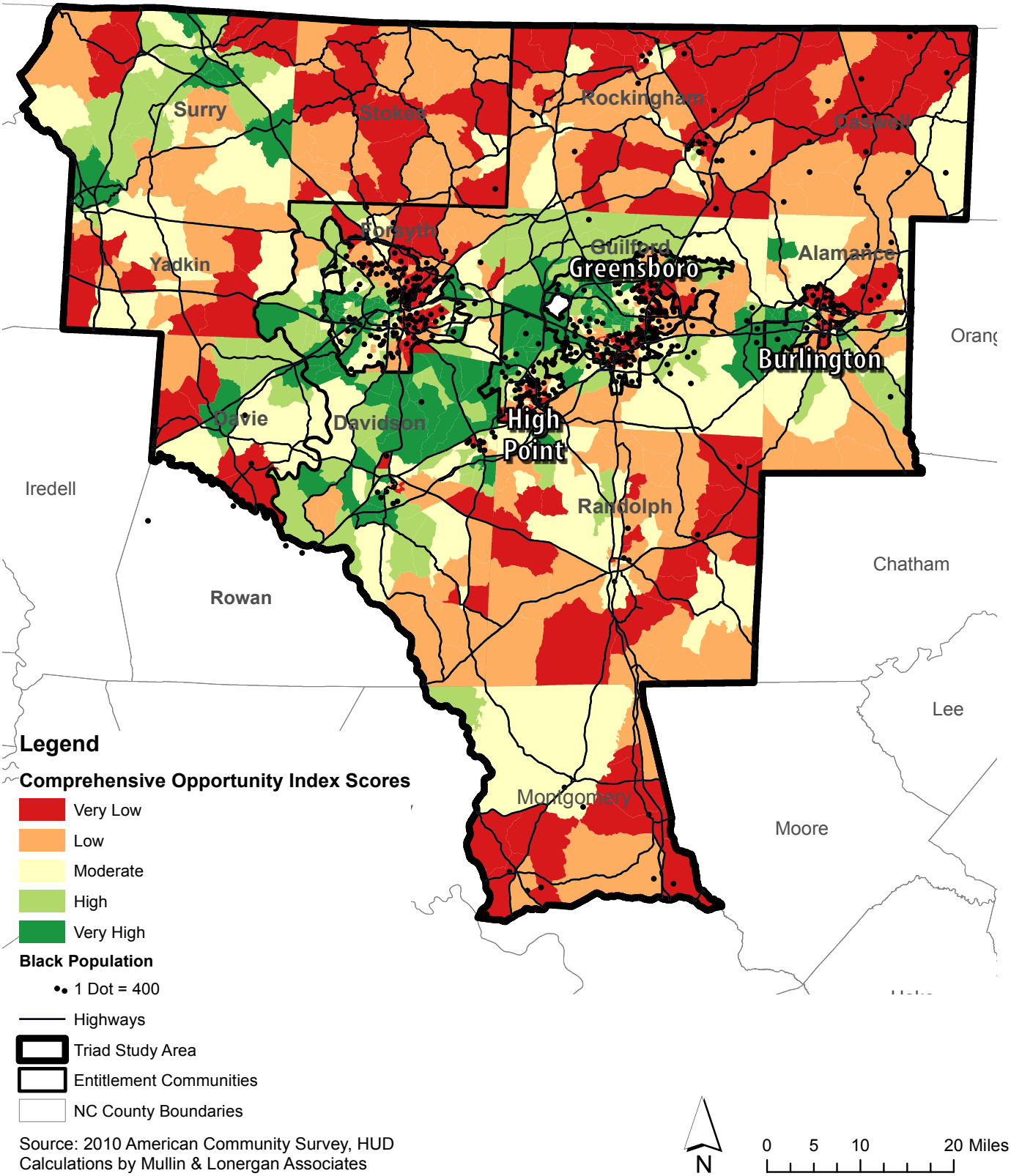
Source: U.S. Census 2010, HUD 2010. Calculations by Mullin & Lonergan Associates

MAP 29:
COMPREHENSIVE OPPORTUNITY INDEX SCORES



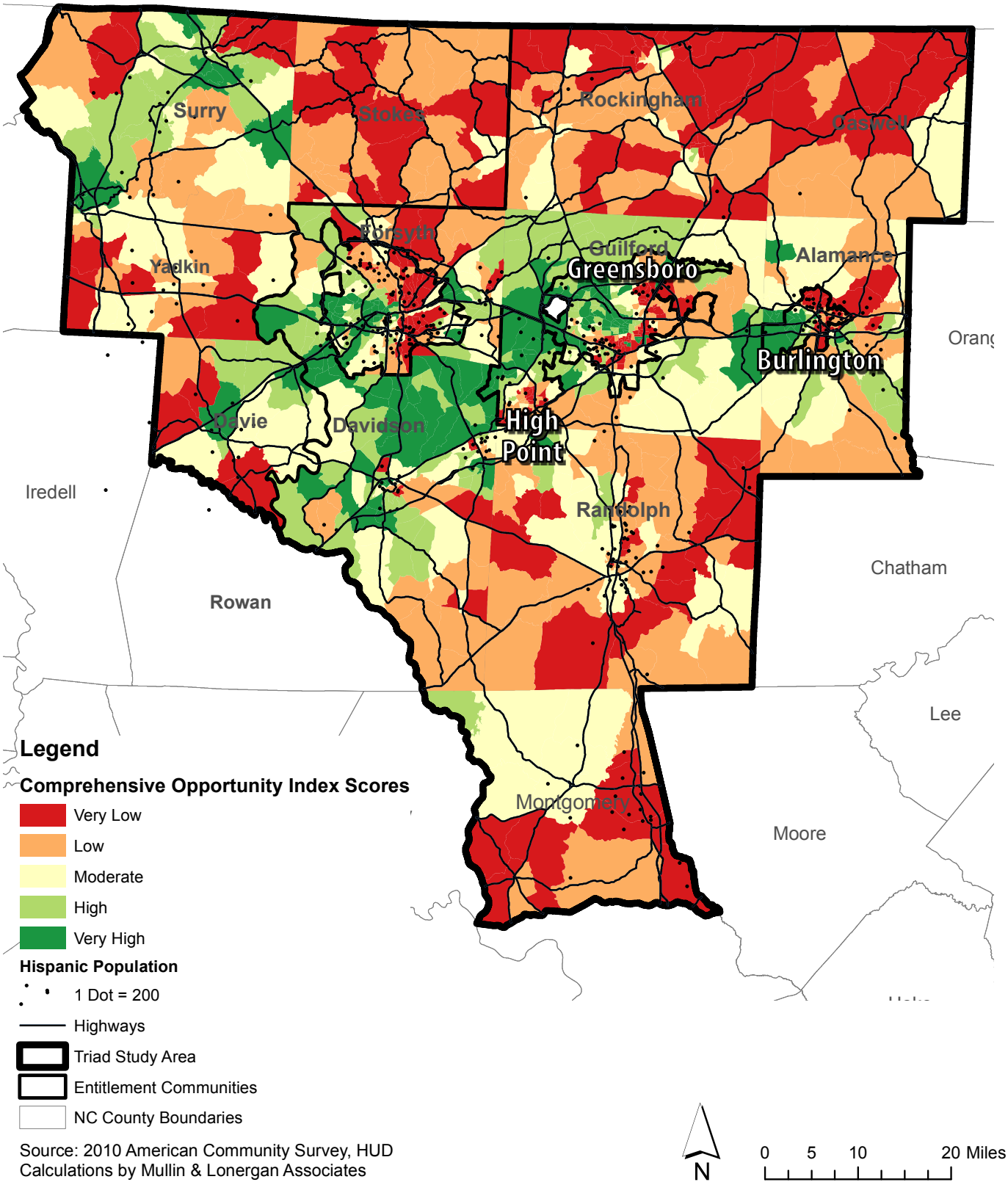
Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 30:
BLACK POPULATION DISTRIBUTION BY NEIGHBORHOOD OPPORTUNITY



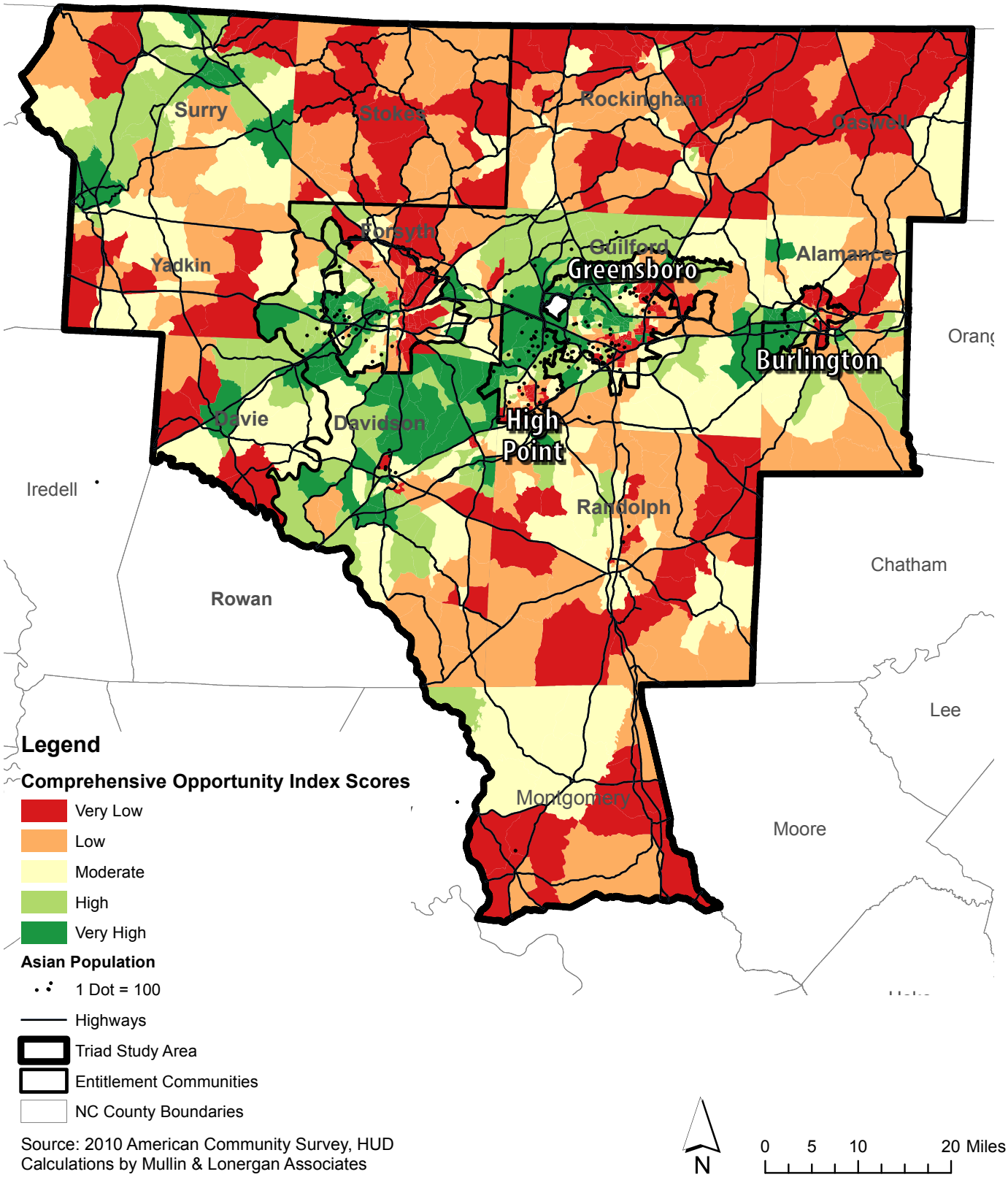
Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 31:
HISPANIC POPULATION DISTRIBUTION BY NEIGHBORHOOD OPPORTUNITY



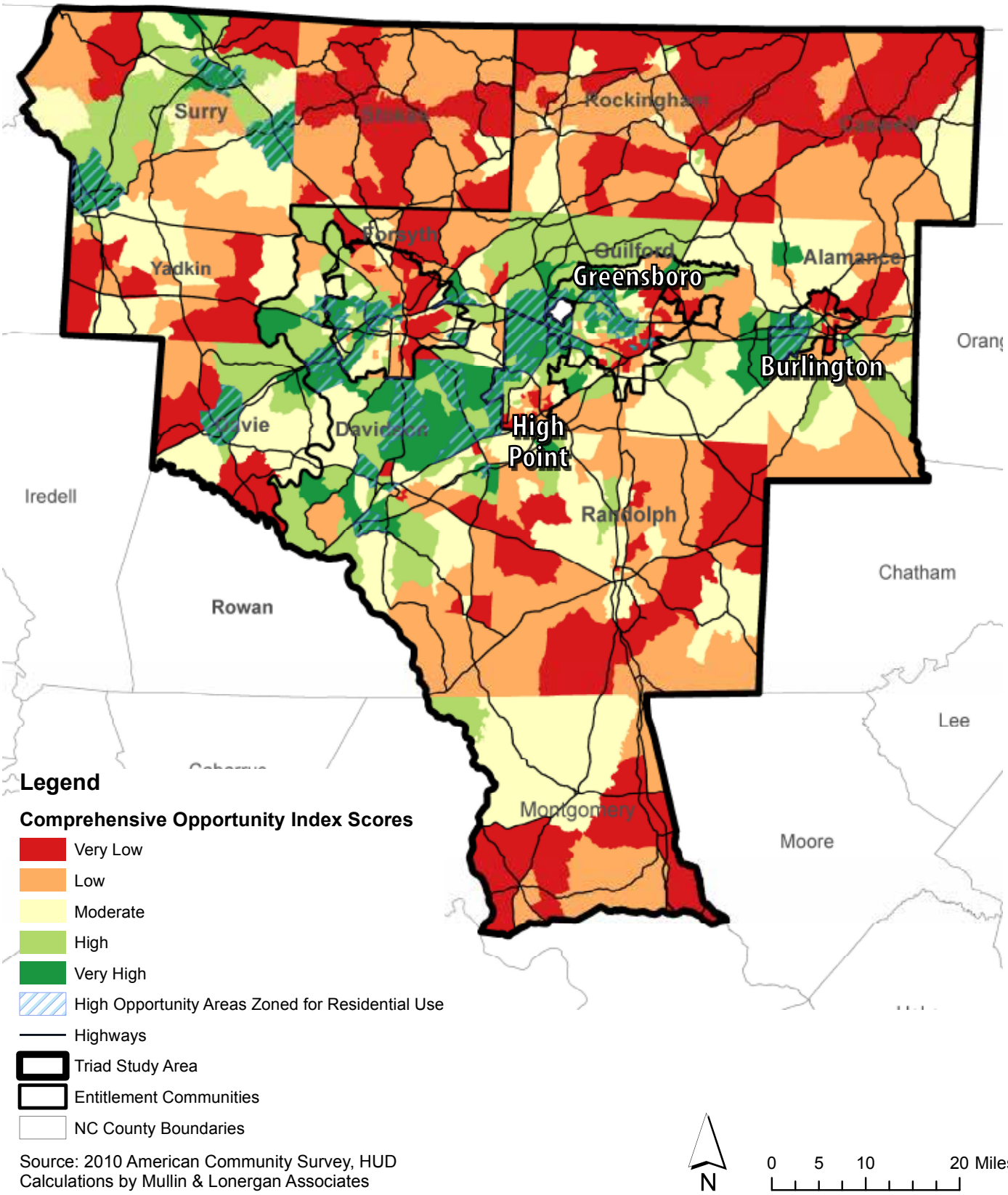
Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 32:
ASIAN POPULATION DISTRIBUTION BY NEIGHBORHOOD OPPORTUNITY



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 33:
COMPREHENSIVE INDEX SCORES AND RESIDENTIAL ZONING



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

HOUSING INVENTORY

Despite a gain of 12.8% in new households between 2000 and 2010, the region's housing stock expanded by a net 93,607 units, or 14.8%. In Burlington, Greensboro, and High Point, the growth rates for housing units also exceeded the population growth rates. Only in the Surry HOME Consortium area did population growth exceed new housing units. A proliferation of units exceeding apparent demand suggests sprawl. Davie and Guilford Counties reported the highest rates of gain in new housing units (19.9% and 18.3%), while Rockingham and Surry Counties reported the lowest (8.0% and 7.5%).

Figure 43 : Change in Total Units, 2000-2010

	2000	2010	% Change 2000-2010
Region	**630,824**	**724,431**	**14.8%**
Burlington city	**19,528**	**23,149**	**18.5%**
Greensboro city	**99,133**	**122,124**	**23.2%**
High Point city	**35,933**	**44,646**	**24.2%**
Surry HOME Consortium	**81,069**	**90,079**	**11.1%**
Davie County	**14,953**	**17,923**	**19.9%**
Bermuda Run town	792	1,051	32.7%
Cooleemee town	448	359	-19.9%
Mocksville town	1,783	2,183	22.4%
Stokes County	**19,262**	**21,596**	**12.1%**
Danbury town	51	102	100.0%
King city	2,471	3,007	21.7%
Walnut Cove town	642	656	2.2%
Surry County	**31,033**	**33,374**	**7.5%**
Dobson town	598	704	17.7%
Elkin town	1,907	2,044	7.2%
Mount Airy city	4,101	5,232	27.6%
Pilot Mountain town	660	748	13.3%
Yadkin County	**15,821**	**17,186**	**8.6%**
Boonville town	530	645	21.7%
East Bend town	293	312	6.5%
Jonesville town	777	1,207	55.3%
Yadkinville town	998	998	0.0%
Alamance County	**55,463**	**65,170**	**17.5%**
Caswell County	**9,601**	**10,546**	**9.8%**
Davidson County	**62,432**	**71,474**	**14.5%**
Forsyth County	**133,093**	**154,153**	**15.8%**
Guilford County	**180,391**	**213,377**	**18.3%**
Montgomery County	**14,145**	**15,697**	**11.0%**
Randolph County	**54,422**	**60,510**	**11.2%**
Rockingham County	**40,208**	**43,425**	**8.0%**

Source: U.S. Census Bureau, Census 2000 (DP04) and 2006-2010 American Community Survey (DP04)

Despite a gain of 12.8% new households between 2000 and 2010, the region's housing stock expanded by a net 93,607 units, or 14.8%.

In 2010, single-family units comprised 72.1% of the housing stock in the region, and multi-family units comprised 18.2%. Mobile homes accounted for the remaining 11.1%. Multi-family buildings composed 10% or more of the housing supply in only five of the region's 12 counties. Only in Forsyth and Guilford Counties did this figure exceed 20%. Of the four entitlement communities, only Greensboro had more than one-third multi-family dwellings.

The region's housing stock expanded at a greater rate than its population between 2000 and 2010. This mismatch between supply and demand suggests sprawl.

Figure 44 : Multi-Family Units by Jurisdiction, 2010

	Total Units	Multi-Family Units #	%
Region	**724,431**	**131,962**	**18.2%**
Burlington city	**23,149**	**6,420**	**27.7%**
Greensboro city	**122,124**	**44,899**	**36.8%**
High Point city	**44,646**	**12,513**	**28.0%**
Surry HOME Consortium	**90,079**	**4,989**	**5.5%**
Davie County	**17,923**	**903**	**5.0%**
Bermuda Run town	1,051	261	24.8%
Cooleemee town	359	2	0.6%
Mocksville town	2,183	515	23.6%
Stokes County	**21,596**	**954**	**4.4%**
Danbury town	102	0	0.0%
King city	3,007	440	14.6%
Walnut Cove town	656	230	35.1%
Surry County	**33,374**	**2,508**	**7.5%**
Dobson town	704	248	35.2%
Elkin town	2,044	483	23.6%
Mount Airy city	5,232	1,153	22.0%
Pilot Mountain town	748	232	31.0%
Yadkin County	**17,186**	**624**	**3.6%**
Boonville town	645	69	10.7%
East Bend town	312	11	3.5%
Jonesville town	1,207	348	28.8%
Yadkinville town	998	133	13.3%
Alamance County	**65,170**	**11,092**	**17.0%**
Caswell County	**10,546**	**366**	**3.5%**
Davidson County	**71,474**	**7,430**	**10.4%**
Forsyth County	**154,153**	**39,359**	**25.5%**
Guilford County	**213,377**	**57,832**	**27.1%**
Montgomery County	**15,697**	**674**	**4.3%**
Randolph County	**60,510**	**6,069**	**10.0%**
Rockingham County	**43,425**	**4,151**	**9.6%**

Source: U.S. Census Bureau, 2006-2010 American Community Survey (DP04)

Figure 45 : Units by Structure Type, 2010

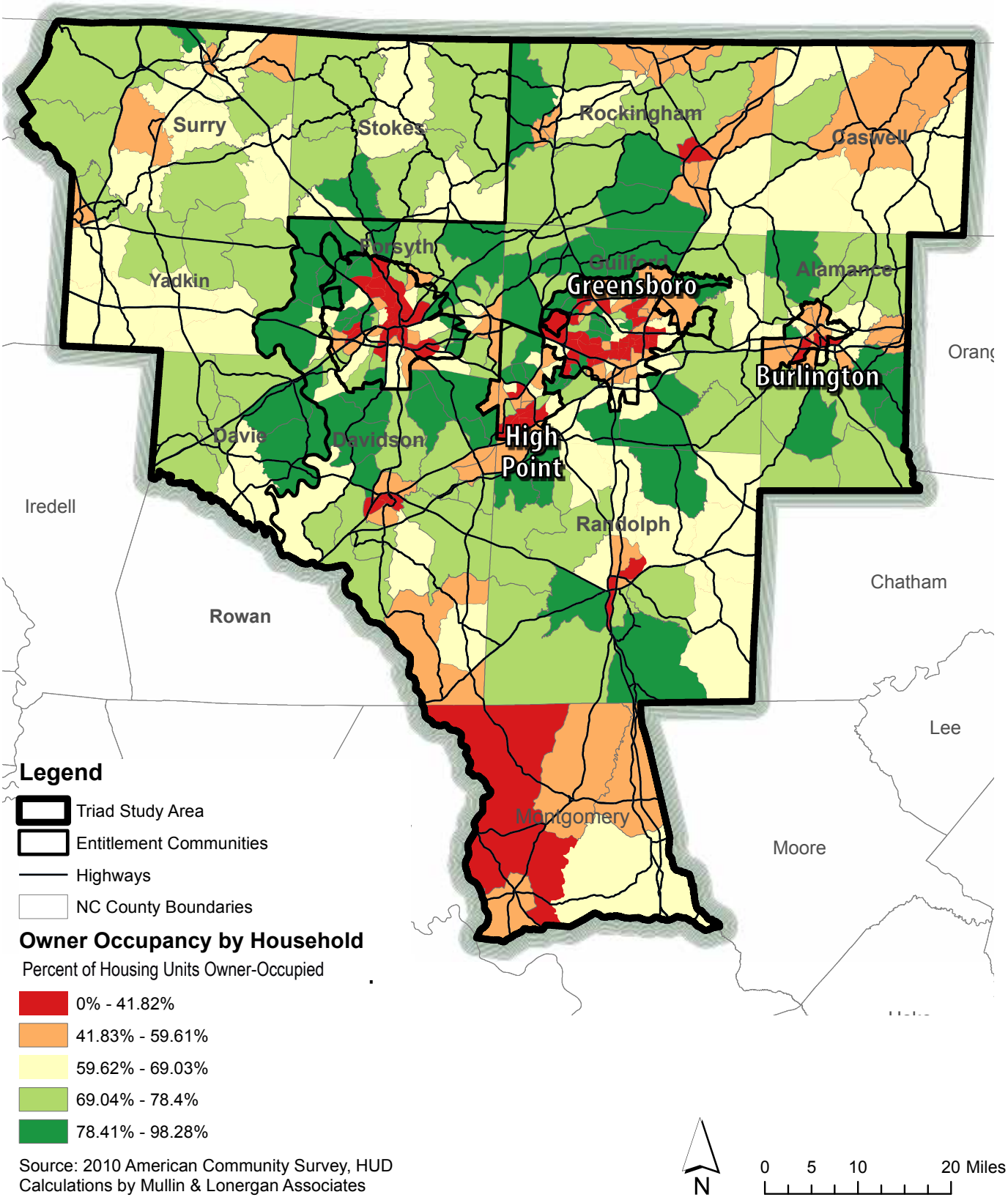
	Total Units	Single-family units	Multi-Family Units					Mobile homes
			2 to 4 units	5 to 9 units	10 to 19 units	20 or more units	Total Multi-family	
Region	**724,431**	**506,284**	**34,893**	**40,433**	**35,530**	**21,106**	**131,962**	**86,009**
Burlington city	**23,149**	**15,819**	**2,546**	**1,434**	**1,378**	**1,062**	**6,420**	**902**
Greensboro city	**122,124**	**75,661**	**8,619**	**16,969**	**12,526**	**6,785**	**44,899**	**1,564**
High Point city	**44,646**	**31,703**	**3,222**	**3,098**	**3,650**	**2,543**	**12,513**	**430**
Surry HOME Consortium	**90,079**	**62,600**	**2,391**	**1,381**	**575**	**642**	**4,989**	**22,426**
Davie County	**17,923**	**13,726**	**305**	**320**	**75**	**203**	**903**	**3,281**
Bermuda Run town	1,051	790	69	40	0	152	261	0
Cooleemee town	359	350	0	2	0	0	2	7
Mocksville town	2,183	1,635	180	209	75	51	515	33
Stokes County	**21,596**	**14,640**	**351**	**309**	**179**	**115**	**954**	**6,002**
Danbury town	102	101	0	0	0	0	0	1
King city	3,007	2,381	190	62	89	99	440	186
Walnut Cove town	656	397	62	113	48	7	230	29
Surry County	**33,374**	**22,549**	**1,331**	**668**	**245**	**264**	**2,508**	**8,269**
Dobson town	704	361	137	66	22	23	248	95
Elkin town	2,044	1,422	128	153	74	128	483	139
Mount Airy city	5,232	3,666	742	226	83	102	1,153	400
Pilot Mountain town	748	507	43	123	66	0	232	9
Yadkin County	**17,186**	**11,685**	**404**	**84**	**76**	**60**	**624**	**4,874**
Boonville town	645	559	39	27	0	3	69	14
East Bend town	312	216	11	0	0	0	11	85
Jonesville town	1,207	826	206	52	42	48	348	33
Yadkinville town	998	704	122	5	6	0	133	161
Alamance County	**65,170**	**44,578**	**3,836**	**3,106**	**2,388**	**1,762**	**11,092**	**9,457**
Caswell County	**10,546**	**7,078**	**222**	**75**	**26**	**43**	**366**	**3,102**
Davidson County	**71,474**	**52,748**	**4,179**	**1,455**	**983**	**813**	**7,430**	**11,296**
Forsyth County	**154,153**	**108,314**	**7,260**	**10,543**	**14,347**	**7,209**	**39,359**	**6,480**
Guilford County	**213,377**	**148,277**	**12,177**	**20,486**	**16,029**	**9,140**	**57,832**	**7,268**
Montgomery County	**15,697**	**9,688**	**449**	**91**	**33**	**101**	**674**	**5,335**
Randolph County	**60,510**	**41,451**	**2,876**	**1,872**	**768**	**553**	**6,069**	**12,921**
Rockingham County	**43,425**	**31,550**	**1,503**	**1,424**	**381**	**843**	**4,151**	**7,724**

Source:U.S. Census Bureau, 2006-2010 American Community Survey (DP04)

Burlington, Greensboro, and High Point have below-average homeownership rates.

In 2012, the Census Bureau estimated that the region's occupied housing inventory of 649,982 was 68.1% owner-occupied. In the four entitlement communities, this figure is lower in Burlington, Greensboro, and High Point (56.1%, 54.6%, and 59.1%, respectively), and higher in the Surry HOME Consortium (77.1%). The following map illustrates tenure patterns across the region.

MAP 34:
PERCENT OWNER-OCCUPIED HOMES BY CENSUS TRACT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

There are fewer multi-family units in high opportunity areas.

To isolate apartment units from condominium units that are owner-occupied and located within multi-family structures, The following figure examines the tenure of units by structure type. Of the total owner-occupied housing stock of 442,351 units in the region, 8,311 units (1.9%) were in multi-family structures. This figure was more than doubled in Burlington, Greensboro, and High Point, but lower in the Surry HOME Consortium.

By comparison, there were many more multi-family units within the rental stock. Of the 207,631 rental units in the region, almost half (48.5%) were in multi-family structures. The right-most column of the figure represents the proportion of each community's total renter-occupied multi-family dwellings. Much of the rental housing is found in single-family dwellings, especially in the Surry HOME Consortium counties.

Overall, there are fewer multi-family units in the high opportunity areas of the Piedmont Triad. Conversely, a disproportionate share of the multi-family units in the region are located in low opportunity areas. Because data on units and data on opportunity are classified at different geographies, an exact number of structures cannot be determined. However, this pattern is easy to visually confirm by examining the following map. Areas with the highest opportunity scores — predominantly the triangular area between the urban boundaries of Greensboro, High Point, and Winston-Salem — have very few multi-unit structures. Neither does the high opportunity corridor between Greensboro and Burington. While multi-family units are naturally concentrated in the dense urban areas of Greensboro, Burlington, and High Point, they tend to be in the low opportunity urban areas rather than in the high opportunity urban sections of these cities.

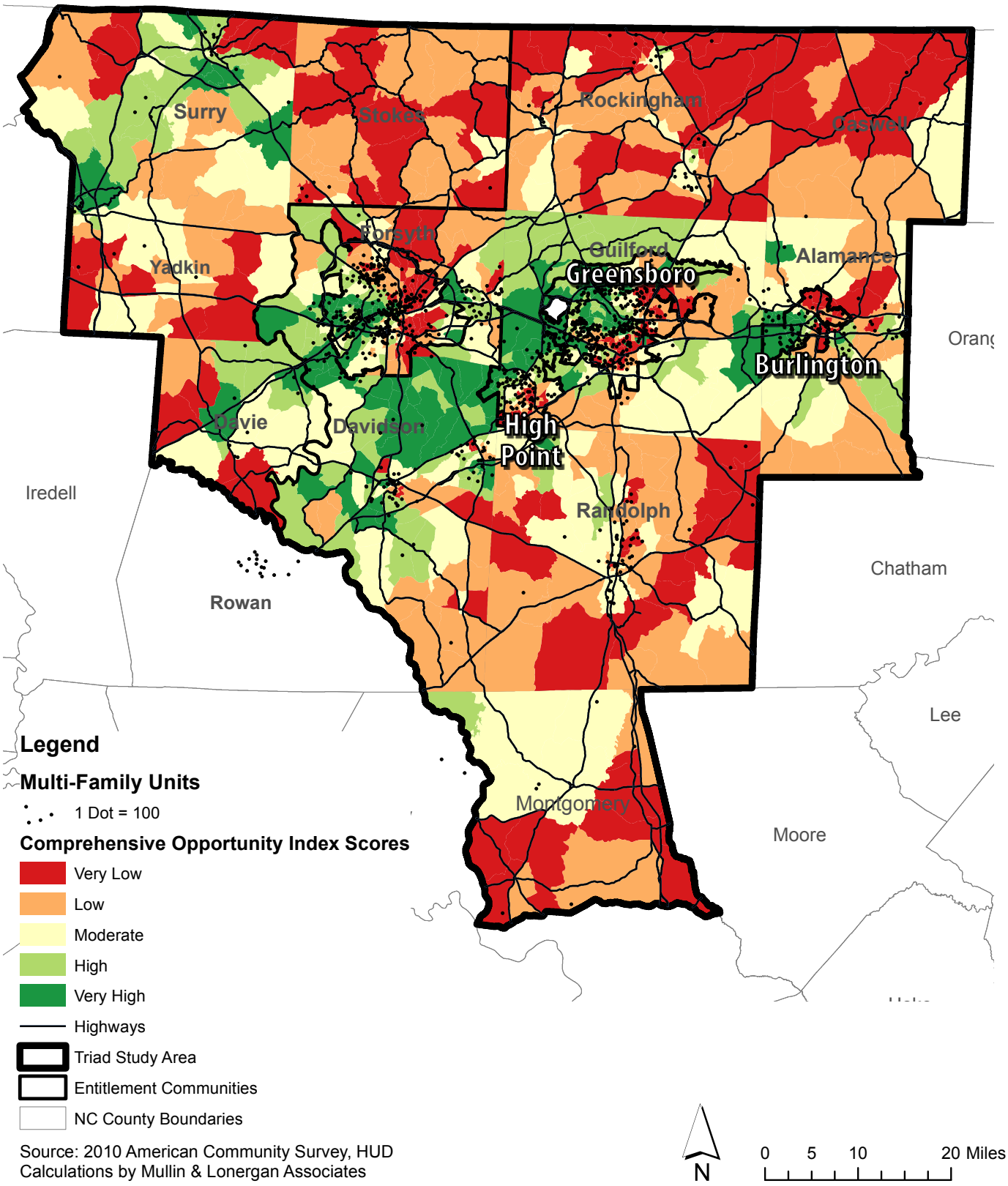
In rural counties, multi-family units are more evenly dispersed. This may be because land costs are more evenly distributed and location depends more on the availability of water and sewer availability than relative opportunity.

Figure 46 : Tenure by Structure Type, 2010

		Owner-occupied housing units				Renter-occupied housing units				
	Total Units	Total Owner Units	Single-family	Multi-family	% Multi-family	Total Rental Units	Single-family	Multi-family	% Multi-family	% Renter-Occupied Multi-Family
Region	**649,982**	**442,351**	**384,761**	**8311**	**1.9%**	**207,631**	**84,069**	**100,746**	**48.5%**	**15.5%**
Burlington city	**21,645**	**12,210**	**10,831**	**606**	**5.0%**	**9,435**	**4,075**	**5,192**	**55.0%**	**24.0%**
Greensboro city	**110,402**	**60,242**	**56,203**	**3160**	**5.2%**	**50,160**	**14,586**	**35,035**	**69.8%**	**31.7%**
High Point city	**40,038**	**23,672**	**22,482**	**1009**	**4.3%**	**16,366**	**6,966**	**9,243**	**56.5%**	**23.1%**
Surry HOME Consortium	**80,353**	**61,926**	**48,263**	**334**	**0.5%**	**18,427**	**8,786**	**3,796**	**20.6%**	**4.7%**
Davie County	**16,219**	**13,282**	**11,127**	**113**	**0.9%**	**2,937**	**1,547**	**482**	**16.4%**	**3.0%**
Bermuda Run town	884	806	733	73	9.1%	78	15	63	80.8%	7.1%
Cooleemee town	356	267	247	0	0.0%	89	84	0	0.0%	0.0%
Mocksville town	1,928	1,398	1,349	24	1.7%	530	200	330	62.3%	17.1%
Stokes County	**19,326**	**15,193**	**11,698**	**31**	**0.2%**	**4,133**	**1,841**	**759**	**18.4%**	**3.9%**
Danbury town	74	57	55	0	0.0%	17	17	0	0.0%	0.0%
King city	2,713	2,146	2,092	0	0.0%	567	235	248	43.7%	9.1%
Walnut Cove town	716	346	316	9	2.6%	370	122	245	66.2%	34.2%
Surry County	**29,916**	**21,806**	**16,519**	**182**	**0.8%**	**8,110**	**3,774**	**2,116**	**26.1%**	**7.1%**
Dobson town	618	264	243	0	0.0%	354	92	239	67.5%	38.7%
Elkin town	1,625	904	874	8	0.9%	721	298	290	40.2%	17.8%
Mount Airy city	4,689	2,796	2,566	110	3.9%	1,893	763	954	50.4%	20.3%
Pilot Mountain town	689	359	340	10	2.8%	330	148	173	52.4%	25.1%
Yadkin County	**14,892**	**11,645**	**8,919**	**8**	**0.1%**	**3,247**	**1,624**	**439**	**13.5%**	**2.9%**
Boonville town	669	486	482	0	0.0%	183	100	76	41.5%	11.4%
East Bend town	248	181	125	0	0.0%	67	45	0	0.0%	0.0%
Jonesville town	1,054	531	513	8	1.5%	523	299	224	42.8%	21.3%
Yadkinville town	991	630	601	0	0.0%	361	172	106	29.4%	10.7%
Alamance County	**60,310**	**40,687**	**33,795**	**724**	**1.8%**	**19,623**	**8,676**	**8,617**	**43.9%**	**14.3%**
Caswell County	**8,755**	**6,488**	**4,651**	**16**	**0.2%**	**2,267**	**1,351**	**277**	**12.2%**	**3.2%**
Davidson County	**64,699**	**47,002**	**40,501**	**177**	**0.4%**	**17,697**	**8,781**	**5,856**	**33.1%**	**9.1%**
Forsyth County	**139,033**	**89,902**	**84,114**	**2424**	**2.7%**	**49,131**	**17,886**	**29,343**	**59.7%**	**21.1%**
Guilford County	**193,890**	**121,181**	**112,933**	**4306**	**3.6%**	**72,709**	**25,806**	**44,629**	**61.4%**	**23.0%**
Montgomery County	**10,066**	**7,401**	**5,205**	**1**	**0.0%**	**2,665**	**1,219**	**543**	**20.4%**	**5.4%**
Randolph County	**55,032**	**40,460**	**32,981**	**251**	**0.6%**	**14,572**	**6,327**	**4,493**	**30.8%**	**8.2%**
Rockingham County	**37,844**	**27,304**	**22,318**	**78**	**0.3%**	**10,540**	**5,237**	**3,192**	**30.3%**	**8.4%**

Source: U.S. Census Bureau, 2008-2012 American Community Survey (B25032)

MAP 35: MULTI-FAMILY STRUCTURES IN HIGH OPPORTUNITY AREAS



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

White households were much more likely to own their homes than Black, Asian or Hispanic households across the region and in most cities and counties.

The following figure highlights differences in home ownership across racial and ethnic categories in various communities. As a function of their generally higher incomes, White households were much more likely to own their homes than Black, Asian or Hispanic households across the region and in most cities and counties. This is consistent with the FHEA's finding that minorities were noted to have difficulty obtaining a mortgage in the region.

Figure 47 : Tenure by Race/Ethnicity, 2010

	White		Black		Asian		Hispanic	
	HHs	% Owners	HHs	% Owners	HHs	% Owners	HHs	% Owners
Region	**484,817**	**75.0%**	**133,018**	**46.7%**	**9,073**	**60.2%**	**35,346**	**45.8%**
Burlington city	**13,724**	**64.8%**	**5,786**	**36.7%**	**324**	**49.1%**	**1,974**	**60.9%**
Greensboro city	**59,791**	**66.9%**	**43,763**	**39.2%**	**3,036**	**54.8%**	**5,510**	**31.5%**
High Point city	**24,151**	**69.9%**	**12,699**	**39.6%**	**1,676**	**68.0%**	**2,324**	**36.3%**
Surry HOME Consortium	**74,895**	**78.6%**	**3,636**	**61.3%**	**108**	**54.6%**	**3,184**	**53.9%**
Davie County	**14,663**	**83.5%**	**1,103**	**69.1%**	**36**	**100.0%**	**577**	**56.7%**
Bermuda Run town	837	90.7%	29	100.0%	13	100.0%	5	100.0%
Cooleemee town	296	86.8%	39	10.3%	0	-	23	13.0%
Mocksville town	1,547	75.8%	336	63.1%	0	-	67	53.7%
Stokes County	**18,131**	**80.0%**	**884**	**63.2%**	**23**	**100.0%**	**262**	**77.5%**
Danbury town	74	77.0%	0	-	0	-	0	-
King city	2,616	78.9%	32	50.0%	23	100.0%	13	100.0%
Walnut Cove town	572	48.6%	132	42.4%	0	-	8	100.0%
Surry County	**28,192**	**74.5%**	**1,121**	**47.3%**	**45**	**0.0%**	**1,619**	**51.3%**
Dobson town	527	43.8%	25	16.0%	0	-	148	25.0%
Elkin town	1,450	58.9%	119	42.0%	0	-	261	43.3%
Mount Airy city	4,198	62.8%	386	30.1%	17	0.0%	151	28.5%
Pilot Mountain town	632	53.6%	53	37.7%	0	-	19	0.0%
Yadkin County	**13,909**	**79.5%**	**528**	**71.6%**	**4**	**0.0%**	**726**	**48.9%**
Boonville town	656	72.6%	6	50.0%	0	-	38	100.0%
East Bend town	234	74.8%	2	100.0%	0	-	30	13.3%
Jonesville town	889	51.0%	108	48.1%	0	-	50	52.0%
Yadkinville town	865	69.5%	53	35.8%	4	0.0%	168	34.5%
Alamance County	**44,263**	**73.4%**	**11,346**	**49.6%**	**419**	**51.8%**	**4,571**	**57.1%**
Caswell County	**5,541**	**78.4%**	**2,962**	**68.3%**	**0**	**-**	**146**	**39.7%**
Davidson County	**57,005**	**76.3%**	**5,821**	**41.7%**	**517**	**75.0%**	**2,607**	**44.0%**
Forsyth County	**95,666**	**73.3%**	**35,760**	**45.6%**	**2,160**	**51.9%**	**9,853**	**39.3%**
Guilford County	**120,065**	**73.3%**	**61,785**	**43.3%**	**5,266**	**63.5%**	**9,512**	**38.3%**
Montgomery County	**8,182**	**78.7%**	**1,620**	**52.5%**	**108**	**38.0%**	**797**	**56.0%**
Randolph County	**49,755**	**75.5%**	**3,064**	**59.3%**	**371**	**66.0%**	**3,431**	**55.8%**
Rockingham County	**29,445**	**76.3%**	**7,024**	**56.9%**	**124**	**41.9%**	**1,245**	**63.1%**

Source: U.S. Census Bureau, 2008-2012 American Community Survey (B25003A, B25003B, B25003D, and B25003I)

HOUSEHOLD SIZE AND PROTECTED CLASS STATUS

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes. Such policies do not exist in any of the Piedmont Triad counties at the County level, or within North Carolina State law, but can potentially exist in municipal ordinances.

In all parts of the region, minorities were more likely than Whites to live in households with three or more people. In 2010, 50.8% of White families had three or more people. By comparison, 61.1% of Black families were large. At least three in four Asian and Hispanic families contained three or more people (76.9% and 86.0%, respectively). This order held true in each of the four entitlement communities as well. In Burlington, Greensboro, and High Point, White families were slightly less likely to contain three or more people.

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In the Piedmont Triad, there are few options to rent a unit to accommodate large families. Of the 207,631 rental units in 2012, only one-third had three or more bedrooms, compared to 79.6% of the owner housing stock. This holds true in each of the four entitlement communities as well.

Figure 48 : Percent of Familes with Three or More Members by Race/Ethnicity

	White	Black	Asian	Hispanic	Total
Region Total	50.8%	61.1%	76.9%	86.0%	54.9%
Burlington	48.8%	60.5%	76.2%	88.4%	56.4%
Greensboro	48.0%	61.6%	76.6%	82.3%	56.1%
High Point	50.4%	64.2%	80.5%	83.0%	58.4%
SHC	50.8%	58.3%	65.6%	87.6%	52.6%

Source: U.S. Census Bureau, Census 2010 (P28, P28A, P28B, P28D, P28H)

Figure 49 : Unit Size by Tenure, 2012

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	# Units	% of all units	# Units	% of all units
Region	**207,631**		**442,351**	
0-1 bedroom	41,898	20.2%	5,411	1.2%
2 bedrooms	96,566	46.5%	84,884	19.2%
3 or more bedrooms	69,167	33.3%	352,056	79.6%
Burlington	**9,435**		**12,210**	
0-1 bedroom	2,403	25.5%	120	1.0%
2 bedrooms	4,066	43.1%	3,127	25.6%
3 or more bedrooms	2,966	31.4%	8,963	73.4%
Greensboro	**50,160**		**60,242**	
0-1 bedroom	13,496	26.9%	570	0.9%
2 bedrooms	23,211	46.3%	10,982	18.2%
3 or more bedrooms	13,453	26.8%	48,690	80.8%
High Point	**16,366**		**23,672**	
0-1 bedroom	3,156	19.3%	172	0.7%
2 bedrooms	7,337	44.8%	4,153	17.5%
3 or more bedrooms	5,873	35.9%	19,347	81.7%
Surry HOME Consortium	**18,427**		**61,926**	
0-1 bedroom	2,634	14.3%	1,076	1.7%
2 bedrooms	8,696	47.2%	13,363	21.6%
3 or more bedrooms	7,097	38.5%	47,487	76.7%

Source: U.S. Census Bureau, 2008-2012 American Community Survey (B25042)

HOUSING COSTS

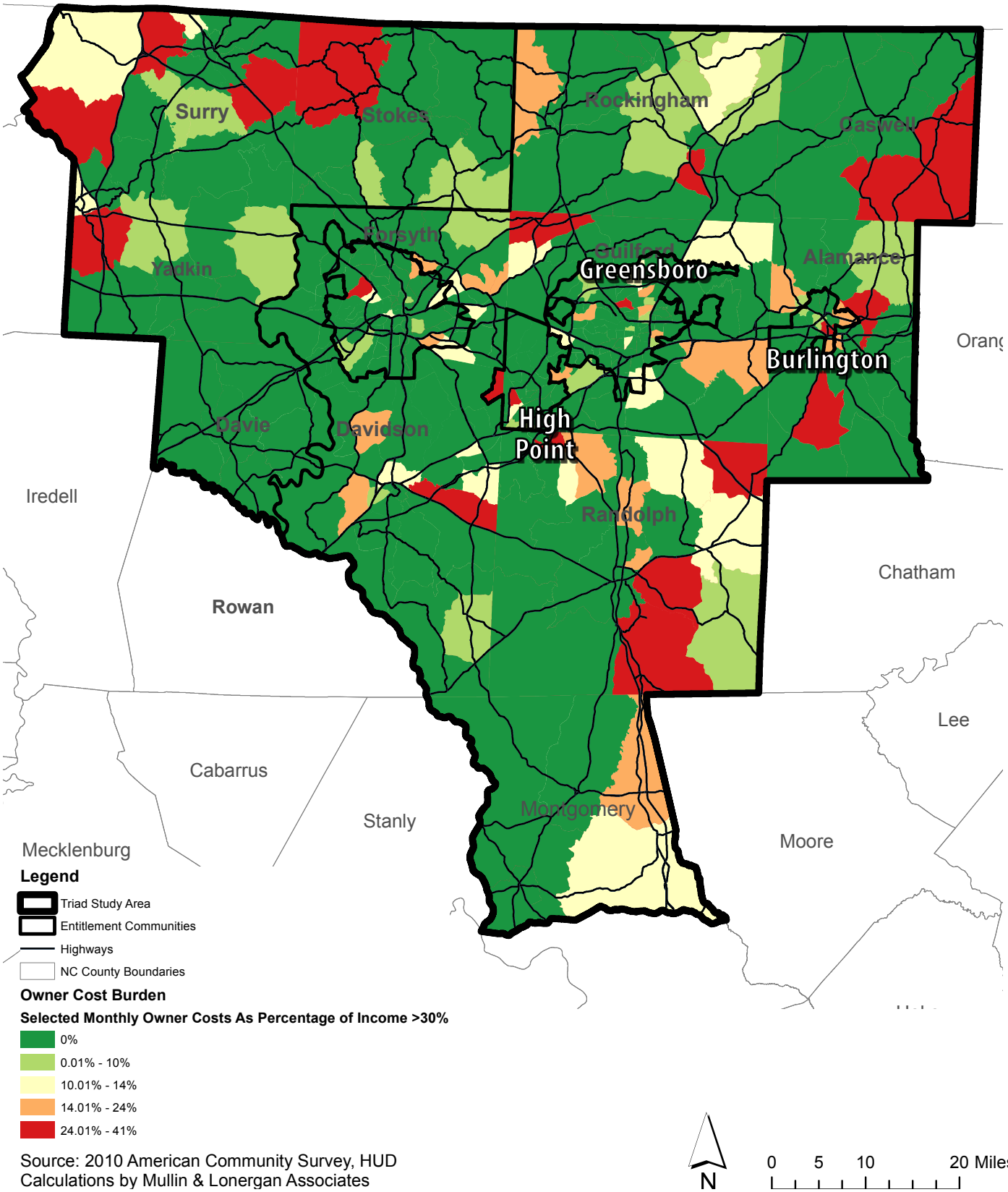
Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. This AFH defines affordable housing as housing units priced at or below 30% of a household's monthly income. Residents may be limited to a smaller selection of communities or neighborhoods because of a lack of affordable housing in those areas. When housing costs for quality affordable units are high, low-income and marginalized segments of the population are disproportionately more likely to become cost burdened.

The following maps display cost burden, defined by HUD as paying more than 30% of one's income towards housing costs, by census tract in the Piedmont Triad. The most cost burdened areas are found within core urban areas, as well as in Surry, Caswell, and Randolph Counties. Renters are significantly more cost-burdened than owners, and cost burdened renters are concentrated in areas with high racial concentration and poverty levels in Winston-Salem, Greensboro, Burlington, Asheboro, and Reidsville.

Minorities were more likely than Whites to live in households with three or more people.

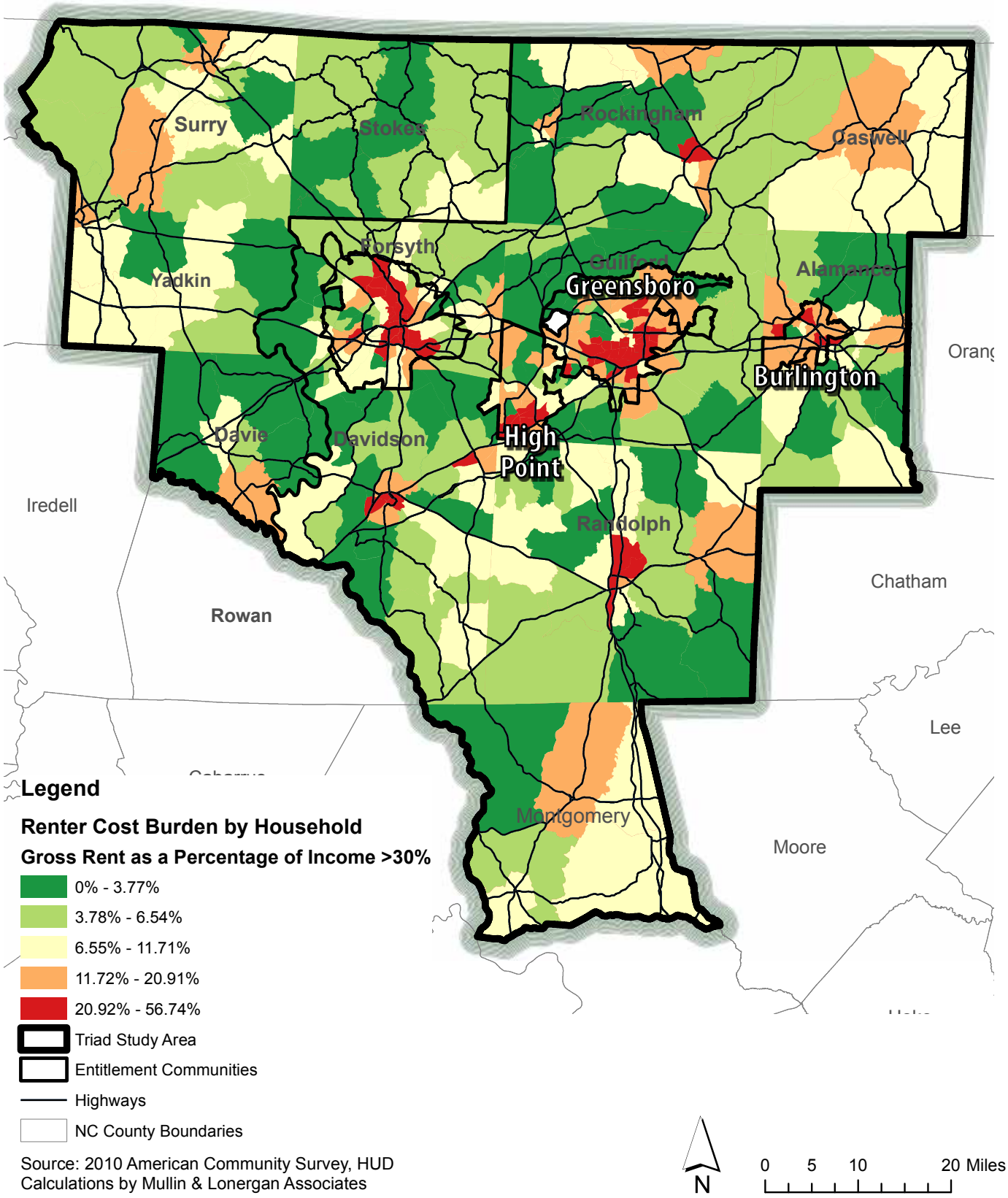
Renter households are significantly more likely to be cost burdened and pay more than 30% of their income on housing costs.

MAP 36:
HOMEOWNERS PAYING MORE THAN 30% OF GROSS INCOME IN HOUSING COSTS BY CENSUS TRACT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 37:
RENTERS PAYING MORE THAN 30% OF GROSS INCOME IN HOUSING COSTS BY CENSUS TRACT



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

A lack of affordable housing also leads to overcrowding in units and occupying sub-standard housing, which are indicative of constrained housing choice. These variables signify acute and unanswered housing needs within a community, and high rates of these are indicative of housing problems. Households with any of the following characteristics are classified as having a housing problem:

- Lacking complete kitchen facilities
- Lacking complete plumbing facilities
- More than one person per room
- Cost burden: monthly housing costs, including utilities, exceeds 30% of monthly income

Households with the following characteristics are said to have a severe housing problem:

- Lacking complete kitchen facilities
- Lacking complete plumbing facilities
- More than 1.5 persons per room
- Severe cost burden: monthly housing costs, including utilities, exceeds 50% of monthly income

As the following figure demonstrates, the counties facing the largest proportion of households with housing problems are Alamance, Forsyth, Guilford, and Randolph. These counties are disproportionately affected by overcrowding by raw numbers, although the percentage of residents overcrowded in Guilford County is lower. Overcrowding is more evident in Randolph, Alamance, Surry, and Forsyth Counties, likely due to the higher rents per square foot that many low-income households cannot afford. The high levels of overcrowding in urban areas relative to rural areas suggest that the highest affordable housing demand is in these areas of the region.

The high levels of overcrowding in urban areas suggests that the demand for affordable housing is higher in these urban areas than in rural areas.

Figure 50 : Housing Problems by County, 2010

County	Number of Occupied Units	No Kitchen Facilities	No Plumbing Facilities	More than 1 Occupant per Room	Percent of Units Overcrowded
Alamance	59,000	543	333	1,481	2.51%
Caswell	8,788	49	20	91	1.04%
Davidson	64,484	300	103	1,184	1.84%
Davie	15,832	43	69	208	1.31%
Forsyth	136,612	1,172	915	3,302	2.42%
Guilford	189,561	1,185	887	3,490	1.84%
Montgomery	9,853	131	99	275	2.79%
Randolph	54,925	175	84	1,750	3.19%
Rockingham	37,831	180	122	740	1.96%
Stokes	18,759	12	77	380	2.03%
Surry	29,668	195	210	729	2.46%
Yadkin	14,908	19	28	298	2.00%
Total	**640,221**	**4,004**	**2,947**	**13,928**	**2.18%**

County	Number of Occupied Units	Selected Monthly Owner Costs as a Percentage of Income >30%	Gross Rent as a Percentage of Income >50%	Percentage of Cost Burdened Households	Total Percentage of Households with Housing Problems
Alamance	59,000	8,550	8,518	28.93%	32.92%
Caswell	8,788	1,353	930	25.98%	27.80%
Davidson	64,484	9,363	6,474	24.56%	27.02%
Davie	15,832	2,344	883	20.38%	22.40%
Forsyth	136,612	18,986	21,483	29.62%	33.57%
Guilford	189,561	28,805	32,923	32.56%	35.50%
Montgomery	9,853	1,380	997	24.12%	29.25%
Randolph	54,925	8,168	6,630	26.94%	30.60%
Rockingham	37,831	4,806	4,185	23.77%	26.52%
Stokes	18,759	2,738	1,026	20.07%	22.57%
Surry	29,668	3,244	3,106	21.40%	25.23%
Yadkin	14,908	1,978	1,216	21.42%	23.74%
Total	**640,221**	**91,715**	**88,371**	**28.13%**	**28.09%**

Source: Census 2010
Calculations by Mullin & Lonergan Associates

Between 2000 and 2010, median housing value (adjusted to 2010 dollars using BLS indices) increased 4.4% throughout the region. This figure was more than double in Greensboro and High Point.

Between 2000 and 2010, median housing value (adjusted to 2010 dollars using Bureau of Labor Statistics indices) increased 4.4% throughout the region. This increase was more than double in Greensboro and High Point (8.8% and 11.1%, respectively), and lower in Burlington and the Surry HOME Consortium (2.4% and 1.7%, respectively). In contrast, real median income declined 10.8%. Greensboro and High Point, where median housing value increased more than the region as a whole, also experienced sharper declines in real median incomes. The increase in median housing value paired with a decline in real income means that buying a house is more difficult than it was a decade earlier. The figures on Greensboro and High Point suggest that home ownership is becoming less affordable in those communities than in the region as a whole.

Median gross rent, when adjusted to 2010 dollars, stayed relatively stable in the region between 2000 and 2010 with an increase of just 1.1%. Burlington and the Surry HOME Consortium's median gross rent rose slightly more, High Point's increased by 10%, and Greensboro's decreased 4.9%. Except in Greensboro, the rise in median gross rents mirrored rises in median housing value.

Figure 51 : Changes in Housing Costs and Income, 2000-2010

		Median Housing Value (in 2010 $)	Median Gross Rent (in 2010 $)	Median Household Income (in 2010 $)
Region				
	2000	$129,606	$652	$49,362
	2010	$135,333	$659	$43,980
	Change	4.4%	1.1%	-10.9%
Burlington				
	2000	$121,644	$687	$43,773
	2010	$124,600	$707	$41,482
	Change	2.4%	2.9%	-5.2%
Greensboro				
	2000	$134,664	$754	$49,180
	2010	$146,500	$717	$41,530
	Change	8.8%	-4.9%	-15.6%
High Point				
	2000	$129,208	$655	$49,770
	2010	$143,500	$720	$43,594
	Change	11.1%	10.0%	-12.4%
Surry HOME Consortium				
	2000	$118,316	$541	$45,181
	2010	$120,351	$553	$41,558
	Change	1.7%	2.2%	-8.0%

Source: U.S. Census Bureau, Census 2000 (DP01, QT-H1, H076, H063, P053) and 2006-2010 American Community Survey (DP01, B25077, B25064, B19013)

The number of affordable rental units in the region (defined as renting at a maximum of 30% of the County-wide median household income) declined between 2000 and 2010. The number of rental units renting for less than $500 (the lowest category of rent in the Census) fell 42.2%. There were sharper declines in Burlington and High Point. During the same time period, the number of units renting for over $1000 per month more than tripled (6,223 to 22,384). In Burlington in 2010, there were 10 times as many units renting for more than $1000 than there were in 2000. Greensboro's number of units more than doubled, High Point's increased by almost 500%, the Surry HOME Consortium's number of units renting for over $1000 more than tripled. The data does not provide a distinction between units that were actually lost from the inventory (through demolition, etc.) and those for which rents increased. This figure should be analyzed with an understanding that $500 was worth more in 2000 than in 2010, due to inflation. Due to the categorical nature of the variable, this figure cannot be adjusted for inflation.

The number of affordable rental units in the region declined between 2000 and 2010.The number of rental units renting for less than $500 fell 42.2%. There were sharper declines in Burlington and High Point.

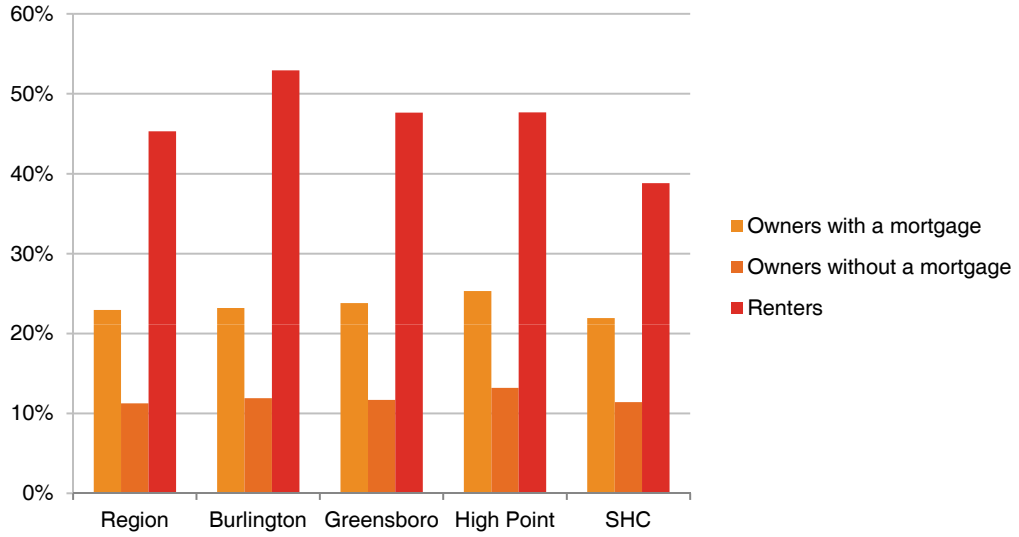
Figure 52 : Changes in Rental Inventory by Price, 2000-2010

			Change	
Units Renting for:	**2000**	**2010**	**#**	**%**
Region				
Less than $500	72,682	41,995	-30,687	-42.2%
$500 to $699	56,643	64,132	7,489	13.2%
$700 to $999	26,701	57,151	30,450	114.0%
$1000 or More	6,223	22,384	16,161	259.7%
Burlington				
Less than $500	2,729	1,480	-1,249	-45.8%
$500 to $699	2,718	2,670	-48	-1.8%
$700 to $999	1,495	3,152	1,657	110.8%
$1000 or More	119	1,186	1,067	896.6%
Greensboro				
Less than $500	11,420	7,225	-4,195	-36.7%
$500 to $699	17,605	14,769	-2,836	-16.1%
$700 to $999	10,755	18,034	7,279	67.7%
$1000 or More	2,573	6,964	4,391	170.7%
High Point				
Less than $500	5,947	2,797	-3,150	-53.0%
$500 to $699	4,718	4,415	-303	-6.4%
$700 to $999	2,111	5,608	3,497	165.7%
$1000 or More	430	2,518	2,088	485.6%
SHC				
Less than $500	8,255	5,788	-2,467	-29.9%
$500 to $699	2,975	5,029	2,054	69.0%
$700 to $999	759	2,751	1,992	262.5%
$1000 or More	236	934	698	295.8%

Source: U.S. Census Bureau, Census 2000 (H062) and 2006-2010 American

A household must earn at least $13.63 per hour to afford a two-bedroom unit at the fair market rent in the Greensboro-High Point metropolitan area.

Figure 53 : Percent Cost Burdened by Tenure and Jurisdiction



The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2014. In Burlington, the FMR for a two-bedroom apartment is $684. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn $2,280 monthly or $27,360 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $13.15 per hour. In North Carolina, a minimum-wage worker earns an hourly wage of $7.25. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 73 hours per week, 52 weeks a year.

In the Greensboro-High Point HUD metro area, the FMR for a two-bedroom apartment is slightly higher than in Burlington, at $709. To afford this rent, a household must earn $2,363 monthly, $28,360 annually, and at least $13.63 per hour. Minimum-wage earners in the Greensboro-High Point metro area would have to work 75 hours per week to earn enough to afford that rent.

According to HUD, if a household spends more than 30% of their income on housing, they are considered cost-burdened. Families may have difficulties paying for other necessities, such as food, clothing, transportation, and medical care. The figure above shows the percent of owners (with and without mortgages) and renters who are cost-burdened in the region and the four entitlement communities. The U.S. Census Bureau calculates monthly owner costs as the sum of mortgages, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees. As one might predict, owners without mortgages are the least likely to be cost-burdened by their housing. In contrast, in 2012, almost half of all renters in the region were burdened by their rental costs.

Figure 54 : Maximum Affordable Home Purchase Price by Race/Ethnicity

		Monthly Mortgage Payment				
	Median Household Income	Mortgage Principal and Interest	Real Estate Taxes	Homeowner's Insurance and PMI	Total Debt Service*	Maximum Affordable Purchase Price
Region	**$43,970**	**$595**	**$111**	**$80**	**$1,286**	**$133,000**
Whites	$49,269	$720	$134	$80	$1,434	$161,000
Blacks	$31,318	$280	$52	$80	$912	$62,500
Asians	$48,850	$712	$133	$80	$1,425	$159,000
Hispanics	$31,556	$286	$53	$80	$919	$64,000
Burlington	**$41,482**	**$528**	**$98**	**$80**	**$1,206**	**$118,000**
Whites	$47,291	$676	$126	$80	$1,382	$151,000
Blacks	$26,787	$170	$32	$80	$782	$38,000
Asians	$56,514	$904	$168	$80	$1,652	$202,000
Hispanics	$38,848	$470	$88	$80	$1,138	$105,000
Greensboro	**$41,530**	**$533**	**$99**	**$80**	**$1,212**	**$119,000**
Whites	$53,221	$819	$153	$80	$1,552	$183,000
Blacks	$30,675	$266	$50	$80	$896	$59,500
Asians	$43,034	$568	$106	$80	$1,254	$127,000
Hispanics	$33,388	$331	$62	$80	$973	$74,000
High Point	**$43,594**	**$582**	**$108**	**$80**	**$1,270**	**$130,000**
Whites	$53,039	$814	$152	$80	$1,546	$182,000
Blacks	$30,788	$269	$50	$80	$899	$60,000
Asians	$42,679	$559	$104	$80	$1,243	$125,000
Hispanics	$35,967	$394	$73	$80	$1,047	$88,000
SHC	**$41,532**	**$537**	**$100**	**$80**	**$1,217**	**$120,000**
Whites	$42,874	$564	$105	$80	$1,249	$126,000
Blacks	$30,104	$251	$47	$80	$878	$56,000
Asians	$41,881	$541	$101	$80	$1,222	$121,000
Hispanics	$27,826	$195	$36	$80	$811	$43,500

The maximum purchase prices for Black and Hispanic households' median incomes were less than half of the maximum for White and Asian households.

One method used to determine the general affordability of a housing market is to calculate the percentage of homes that could be purchased at the median income level. It is possible also to determine the affordability of the housing market for each racial or ethnic group in the region. To determine affordability (i.e. how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 4.34% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes, and insurance (PITI) combined with other consumer debt equaled no more than 35% of gross monthly income, a threshold of financial health commonly used by banks,
- Property taxes across the region were estimated using ACS data on median home value and median real estate taxes and rounded to a tax rate of 1%[1]
- Additional consumer debt (credit cards, car payment, etc.) averaged $500.

1 This rate was imputed by comparing tax paid as a function of housing value, estimating tax rates across the 12-county area, and choosing the nearest estimate.

The above figure details the estimated maximum affordable sales prices and monthly PITI payments for Whites, Blacks, Asians, and Hispanics in the region. The median housing value was $135,333. The region-wide median household income in 2010 was $43,970, which translates to a maximum affordable home purchase price of $133,000. The fact that the median household income in the Piedmont Triad would allow a household to afford about half of the homes in the region suggests that the region is, as a whole, a generally affordable market. However, analysis at a more granular level (such as municipality or county) would reveal smaller sub-markets with higher median sales prices.

However, the maximum affordable purchase prices for Whites and Asians were substantially higher than the affordable home prices for Black and Hispanic homebuyers. The maximum affordable purchase price at the median household income for Blacks was 46% of the median home value in the region. Hispanic households' maximum affordable purchase price was 47% of the median home value. The maximum purchase prices for Black and Hispanic households' median incomes were less than half of the maximum for Whites. These trends continued in the four entitlement communities.

3

ASSESSMENT OF POLICY IMPLICATIONS

This section of the AFH identifies the primary determinants influencing conditions of integration and segregation, concentrations of poverty, disparities in access to community assets, and disproportionate housing needs based on protected class. The basis for the determinants of fair housing identified is the data analysis included in Part 2 of the AFH and a review of selected policies and programs.

INTRODUCTION

In order to expand fair housing choice, it is necessary to have an understanding of the causes or influences that restrict housing choice. In this context, a determinant of fair housing is a factor that controls or influences segregation and integration in the community. In the context of housing discrimination, several determinants, or influences, were identified within the Piedmont Triad region. These determinants are listed below by category.

For the most part, the same determinants are found in all four entitlement communities and the region as a whole. However, the degree to which they exist in each location can differ significantly.

Concentrations of Poverty

High rates of poverty are found throughout the Piedmont Triad in both rural and urban areas. However, the urban core areas contain the highest rates, which are predominantly clustered in RCAPs.

Factors contributing to the higher rates of poverty among members of the protected classes include the following:

- With few exceptions, non-White minorities with significantly lower median household incomes than Whites
- 21.7% of persons with disabilities live in poverty, compared to 13.5% of persons without disabilities
- Median earnings for persons with disabilities were equivalent to only 67% of that for persons without disabilities who earned $28,336
- 26.7% of the foreign-born population live below the poverty line compared to 17.1% of all residents
- 40.8% of female-headed households live in poverty although they represent only 7.9% of all households
- Lower levels of educational attainment and labor market engagement among minorities

Factors contributing to the geographic concentrations of poverty in clearly delineated areas within the region include the following:

- The decades-long federal, state, and local policies of developing most of the region's subsidized housing in predominantly low- and moderate income neighborhoods with little, if any, consideration given to the degree to which these neighborhoods provide access to good quality schools, an accessible labor market and other community assets
- Very limited or non-existent public transportation to link low- and moderate-income neighborhoods with higher opportunity areas where jobs, newer housing, and better schools are available. This is particularly important in Burlington and the four-county Surry HOME Consortium area
- A lack of incentives to develop affordable housing in higher opportunity areas and expand housing choice that is affordable to lower income households
- The concentration of affordable housing inventories in older neighborhoods located in close proximity to downtown areas but significant distances from major employment growth centers in suburban and exurban areas of the region

Disparities in Access to Community Assets

The ability to access a community's or region's assets is critical for residents living in low opportunity areas. Assets such as quality schools, employment centers with jobs for a variety of skill levels and opportunities to advance, and an adequate supply of quality affordable housing create a dynamic community for the benefit of all residents.

To the degree that members of the protected classes experience significant disparity in accessing these assets, then housing choice for them is severely restricted. Unequal access to community assets substantially impedes members of the protected classes' capacity to improve their lives, increase their standard of living, and participate fully in all aspects of community life.

Factors contributing to these disparities include the following:

- Very limited, or a complete lack of, public transportation to link low- and moderate-income neighborhoods with higher opportunity areas where jobs, newer housing, and better schools are available
- A relative absence of jobs located in or within closer proximity to RCAPs, which forces almost 37% of all RCAP residents who are employed to travel 25 miles or more to their jobs
- A lack of affordable housing opportunities in high-opportunity areas, which limits housing choice for lower income residents to low-opportunity areas where lower cost housing is found
- A lack of incentives to develop affordable housing in higher opportunity areas and expand housing choice that is affordable to lower income households

Disproportionate Housing Need based on Protected Class Status

Across the Piedmont Triad region, members of the protected classes are more likely to be renters rather than owners. As described in Section 2 of this AFH, higher poverty rates, lower income levels, and lower educational levels are found disproportionately among minorities, persons with disabilities, female-headed households with children, and foreign-born residents. Together, these trends result in disproportionately greater need for quality affordable housing for members of the protected classes.

Factors contributing to the disproportionate housing needs include the following:

- Minorities are more likely to live in larger families with three or more persons, and require larger housing units to accommodate their families. However, minorities are far more likely to rent their homes, and only 33.3% of the region's rental housing stock contained three bedrooms compared to almost 80% of the owner-occupied stock. This means that minority families do not have adequate access to units of the appropriate size and may face overcrowding.
- Fewer multi-family rental units are located in high-opportunity areas, and a disproportionate share are located in low-opportunity areas. Multi-family rental units in high-opportunity areas may still not be affordable to lower income households.
- Since 2000, a loss of more than 40% of the region's housing inventory renting for under $500 combined with almost a tripling of the number of units renting for $1,000 or more.
- Higher mortgage loan denial rates for non-White applicants in the region.

MORTGAGE LENDING

The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. Unfettered access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

This section describes the methodology and results obtained by a 2012 Fair Housing Equity Assessment conducted by Sills Consulting, LLC produced an analysis of Housing and Mortgage Disclosure Act (HMDA) data obtained from the Federal Financial Institutions Examination Council (FFIEC). Since this analysis utilized the most recent data and is sound in methodology, the results will be summarized and incorporated into the Regional Assessment of Fair Housing.

An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community. Home Mortgage Disclosure Act data contains records for all residential loan activity reported by banks pursuant to the requirements of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. The purpose of the loan, location of the structure in question, and type of unit is also recorded. This information is recorded on the Loan Application Register (LAR), which is a standard reporting form used by the FFIEC, and is used to determine whether financial institutions are serving the housing needs of their communities. The LAR records race as White, Black/African-American, Asian, Native Hawaiian/Pacific Islander, and American Indian/Alaskan Native. Ethnicity is recorded as Hispanic or non-Hispanic.

Across the Piedmont Triad from 2009 to 2012, there were 70,837 loan applications. Of these applications, 69.8% were for conventional loans, 22.2% were for FHA loans, 5.2% were VA loans, and 2.8% were for Farm Service Agency (FSA) or Rural Housing Services (RHS) loans.

The vast majority of loans were for one-to-four-family dwellings. This category also includes small multi-unit dwellings and condominiums, but does not include manufactured/pre-fabricated housing. Most of the loans were for single or small multi-unit housing: 95.5% of applications were for loans on one-to-four-family properties. Of these loan applications, 4.4% were for manufactured housing, and 0.1% of loan applications were for multi-family properties. However, loans for multi-family properties are generally not reported via FFIEC LARs. Mortgage refinancing was the most common purpose, with 64.6% or 45,760 applications in 2011.

The Sills Consulting analysis utilized bivariate analysis of approvals by a cross-section of various socioeconomic variables to make the following conclusions:

- Males were more likely than females to be approved for a loan. In 2011, 63.7% of male applicants and 58.6% female applicants were approved for a loan.
- Approval rates differed considerably by race. White applicants were more likely to be approved than non-White applicants, with the exception of Pacific Islanders. Multi-racial and Black applicants were the least likely to be approved, with 16.6% and 17% lower approval rates than Whites, respectively.

- Reasons for denial varied by race. Between all races, "credit history" was the primary reason for denial. However, 34.4% of non-Whites' applications were denied due to poor credit, compared to 25.7% of denied White applicants. Other denial reasons, such as "debt-to-income ratio", showed only slight differences between non-Whites and Whites. Denial due to insufficient collateral was listed as a reason for 22.7% of White applicants, compared to 18.3% for Non-White applicants.
- Loan approval rates varied significantly by counties. Rural counties had lower approval rates than counties with metropolitan areas within them. Forsyth County, which contains the City of Winston-Salem, had the highest approval rate (67%). Caswell County had the lowest approval rate, with only 51.8% of loan requests approved.

Multi-racial and Black applicants were the least likely to be approved for mortgages, with 16.6% and 17% lower approval rates than Whites, respectively.

Figure 55 : Mortgage Approval Rate by Race/Ethnicity

Race	Mortgage Approval Rate	Percent of Applicant Pool	Mean Income Reported
Pacific Islander	69.90%	0.10%	$72,076
Non-Hispanic White	65.40%	67.70%	$83,611
Asian	58.30%	1.60%	$85,572
Hispanic	51.40%	2.80%	$54,798
African-American	48.40%	9.50%	$59,034
Multiracial	48.00%	0.10%	$81,074

Source: Sills Consulting, LLC

Figure 56 : Mortgage Approval Rate by County

County	Number Denied	Number Approved	Requests Total	Percent Approved
Alamance	2,345	4,188	6,533	64.11%
Caswell	343	368	711	51.76%
Davidson	2,517	4,279	6,796	62.96%
Davie	714	1,329	2,043	65.05%
Forsyth	5,447	11,068	16,515	67.02%
Guilford	8,061	15,191	23,252	65.33%
Montgomery	414	513	927	55.34%
Randolph	1,907	3,199	5,106	62.65%
Rockingham	1,327	1,970	3,297	59.75%
Stokes	716	1,108	1,824	60.75%
Surry	1,000	1,564	2,564	61.00%
Yadkin	493	782	1,275	61.33%
Total	**25,284**	**45,553**	**70,837**	**64.31%**

Source: Sills Consulting, LLC

ANALYSIS OF HUD CPD PROGRAMS

Collectively, the CDBG, HOME, ESG and HOPWA programs are under the authority of the Community Planning and Development (CPD) division of the U.S. Department of Housing & Urban Development (HUD). Annually, each entitlement engages in the development of an Annual Action Plan to identify the eligible activities it will fund and implement with CDBG, HOME, ESG and/or HOPWA funds. This section analyzes the local policies in place that guide how each entitlement affirmatively furthers fair housing as part of the Annual Action Plan process.

The AFFH obligation generally is not included in the local application/project selection processes, nor is it inserted within the compliance language requirements of the entitlements' sub-recipient program agreements. Greensboro's housing loan agreements do specify adherence to the Fair Housing Act language, however, and new construction is subject to site and neighborhood standards.

The sub-recipient agreements reviewed for this purpose required compliance with Title VI of the Civil Rights Act of 1964 (housing discrimination), Section 504 of the Rehabilitation of 1973 (handicapped accessibility), and the Age Discrimination Act of 1975. However, to "affirmatively further fair housing" means to go beyond simply stopping discrimination and proactively work toward desegregation and integration. By considering the degree to which locally proposed activities will AFFH, and giving preference to these, an entitlement can implement activities that promote this goal. Requiring compliance with the Federal Fair Housing Act (Title VIII of the Civil Rights Act of 1968) would facilitate this goal.

In addition, none of the entitlements have a policy (whether informal or formal) that addresses the potential for the suspension or denial of HUD funds to a sub-recipient that has engaged in discriminatory behavior relative to housing. The significance of this latter policy is to protect the entitlement's own AFFH obligation. Through a clearly stated policy, an entitlement should affirm its intention to refrain from funding, or suspend an activity in progress, if it becomes known that a sub-recipient is engaging in discriminatory behavior relative to housing.

Finally, none of the entitlements incorporate the HOME Program's Site and Neighborhood Standards criteria found at 24 CFR 983.6. These criteria should be part of the decision-making process when determining whether a proposed location is appropriate for a HOME-assisted development (i.e., does not contribute to undue concentration of affordable housing in RCAPs and promotes greater housing choice).

Although the absence of these policies do not rise to the level of an impediment to fair housing choice, their presence in local policies and procedures would enhance an entitlement's clearly stated proactive stance relative to AFFH and its intentions to promote greater housing choice in areas of opportunity and de-segregate the development of affordable housing in RCAPs.

ZONING ORDINANCE ANALYSIS TOOL

A sampling of zoning ordinances from counties and municipalities throughout the region were reviewed to identify zoning that may potentially impede housing choice. The ordinances chosen were all communities that have received CDBG funding during the past three years (Burlington, Eden, Greensboro, High Point, Lexington, Yanceyville, Davidson County, Montgomery County, Rockingham County, and Surry County), plus Davie, Stokes and Yadkin counties. The analysis was based on topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The treatment of mobile or manufactured homes
- Minimum lot size requirements
- Dispersal requirements for housing facilities for persons with disabilities in single family zoning districts
- Restrictions of the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms

It is important to consider that the presence of inclusive zoning does not necessarily guarantee a zoning ordinance's fairness. This analysis does not address the issue of availability, suitability, or development potential of sites.

Benchmarking

To evaluate the ordinances consistently, a benchmarking tool was used to assess each ordinance against eleven criteria that are either common indicators of impediments or language that addresses impediments to fair housing choice.

The full set of criteria includes:

1. Ordinance defines "family" inclusively, without a cap on the number of unrelated persons, with a focus on functioning as a single housekeeping unit
2. Ordinance defines "group home" or similarly named land use comparatively to single family dwelling units
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing
4. Ordinance regulates the siting of group homes as single family dwelling units without any additional regulatory provisions
5. Ordinance has a "Reasonable Accommodation" provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right
7. Ordinance does not distinguish between "affordable housing/multi-family housing" (i.e., financed with public funds) and "multi-family housing" (i.e., financed with private funds)
8. Ordinance does not restrict residential uses such as emergency housing/ homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less
11. Ordinance does not include exterior design/aesthetic standards for all single family dwelling units regardless of size, location, or zoning district

Each criterion was assigned one of two values. A score of "1" means that the impediment was not present in the ordinance or that the positive measure was in place. A score of "2" means that impediment was present or that the positive measure was not.

The final benchmark score is a simple average of the individual criterion. More specifically:

Figure 57 : Zoning Benchmark Descriptions

Score	Implication
1.00 - 1.24	Ordinance is at **low** risk relative to discriminatory provisions for housing and members of the protected classes
1.25 - 1.49	Ordinance is at **moderate** risk relative to discriminatory provisions for housing and members of the protected classes.
1.50 - 2.00	Ordinance is at **high** risk relative to discriminatory provisions for housing and members of the protected classes

Figure 58 : Zoning Benchmark Scores, AFH Study Jurisdictions

Community	Score
Yanceyville	1.09
Stokes County	1.14
Davie County	1.18
Burlington	1.18
Montgomery County	1.18
Davidson County	1.18
Lexington	1.27
Yadkin County	1.32
High Point	1.36
Surry County	1.36
Eden	1.36
Greensboro	1.45
Rockingham County	1.5

Results

Every zoning ordinance that was inspected contained some level of mixed results. For some criteria, an ordinance scored well by omission rather than by affirmative action. For example, not defining the term "family" at all was regarded as less of an impediment to fair housing choice than defining a family with a strict limit on the number of unrelated persons. Some criteria, like allowing reasonable accommodation for persons with disabilities or permitting inclusive siting for shelters, were present in very few ordinances. Some, like allowing high density multi-family units in at least one district, were present in most.

All of this is to say that no ordinance is perfect. A high benchmark score does not necessarily reflect a high probability of the real-world implementation of an ordinance causing impediments to fair housing choice. Nor does a low score mean that impediments are unlikely to happen. The scores are merely guidelines to judge a particular code against known fair housing zoning issues.

Most ordinances are ranked as posing a low or moderate risk for discriminatory provisions. Only one can be classified as high risk, passing this threshold by a small margin. The most common affirmative language were favorable definitions and resident limits for family care facilities and group homes, as well as reasonable allowances for multi-family densities. Few ordinances had design guidelines for dwelling units. A notable exception to this is the City of Lexington which has detailed design guidelines for every district. The most common pitfalls were restricting the siting of group homes, as well as limiting the number of allowed family members. No ordinance included a "reasonable accommodation" provision for variances for persons with disabilities.

The highest score of the group (i.e. the most problematic ordinance) is Rockingham County's, at 1.5. Although this ordinance has aspects that are known to promote fair housing, such as limited restrictions on siting manufactured homes, it is also lacking other constructive measures, such as unrestricted siting of family care homes and shelters. It also has one of the most narrow definitions of "family" of all the ordinances reviewed.

The lowest score (i.e. the ordinance that most promotes fair housing choice) was in Yanceyville, at 1.09. Their single transgression was not including a "reasonable accommodation" provision for persons with disabilities.

Details for the three largest cities in the region are included here, representing regulations that govern housing development where the greatest density of people live.

Burlington

Burlington's zoning ordinance scored relatively low on the benchmarking tool, meaning that it does not contain many elements that pose high risks of causing impediments to fair housing choice. Its fair housing supportive elements are comparable to other ordinances in the region. The most conspicuous issue in the ordinance is the definition of a "family" only allowing a maximum of two unrelated persons. This is one of the most restrictive definitions of any ordinance reviewed for the AFH. Its other deficiencies are ones of omission, not explicitly allowing manufactured homes and shelters in residential areas.

High Point

High Point's zoning ordinance also scored relatively high on the benchmarking tool compared to the other ordinances. Its strongest support for fair housing is the most liberal definition of a "family" of all the ordinances reviewed. The ordinance does include a number of disadvantages, however, although none that are especially egregious. These are imposing a siting buffer around group homes, restricting the location of shelters to non-residential districts, and requiring an overlay zone or special use permit for manufactured homes.

Greensboro

Greensboro's zoning ordinance received the second highest score on the benchmarking tool, near the upper limit of the "moderate risk for discriminatory provisions" range. It does not include any exceptional promotions of fair housing choice. On the other hand, it does not include any extraordinary risks for potential impediments. The ordinance requires a siting buffer around group homes, does not allow shelters in residential districts, and requires an overlay zone or special use permit for manufactured homes.

Full detail on how the scoring criteria were applied in each jurisdiction appears in Appendix C.

More than 61% of the assisted housing inventory is located in lower-opportunity areas, compared to just 19.1% in higher-opportunity areas.

ASSISTED HOUSING INVENTORY

Across the Piedmont Triad region, there are many affordable housing resources that have been developed with public funds. The most common of these is public housing. In the region, there are a total of 17 public housing authorities, which own and manage public housing units. Some authorities also administer the Section 8 Housing Choice Voucher Program in their jurisdictions, while some authorities manage only a Section 8 program.

In addition to public housing resources, there are also privately owned housing units. These include housing communities that have been developed with public financing (HOME program funds, low income housing tax credits, HUD Section 202 or Section 811 grants, USDA rural housing financing, among others) but are owned by private entities. Regardless of the ownership arrangement, the assisted housing inventory in the Piedmont Triad is a significant source of affordable housing for individuals and households with incomes of 80% of the median income and below.

In terms of fair housing, the location of assisted rental housing can expand access to community assets or it can perpetuate residential segregation patterns. For example, affordable housing units planned and developed in higher opportunity areas can facilitate access to better schools and jobs. On the other hand, affordable housing that is located exclusively in lower opportunity areas restricts housing choice. This section analyzes the degree to which the location of the assisted housing inventory promotes or restricts housing choice for members of the protected classes in the Piedmont Triad region.

A total of 291 public and privately assisted housing developments were inventoried for this report. Of these, 26.7% of the developments were identified as housing for residents with disabilities, 30.6% were for elderly residents, 41.9% were for families, and 1% were health-related housing.[1]

Assisted housing is not uniformly distributed amongst settled areas of the Piedmont Triad. Rather, it is concentrated in the lower-opportunity areas. The average composite opportunity score for block groups containing assisted housing was 27.7, compared to an average opportunity score of 29.9 throughout the Piedmont Triad. Furthermore, this does not take the number of units into consideration: large-scale multi-unit public housing is clustered heavily in the inner city areas of Greensboro and Winston-Salem.

In the following figure, assisted housing is broken down by the level of the opportunity area in which they are located. The brackets that denominate levels of opportunity are broken down by quintile, meaning each bracket contains 20% of the block groups in the Piedmont Triad. However, the 20% with the lowest opportunity scores contain 38.2% of the assisted housing inventory's units. Conversely, the 20% of block groups with the highest opportunity scores contain just 9.8% of assisted units.

Figure 59 : Assisted Housing Locations by Opportunity Level, 2012

	Very Low Opportunity		Low Opportunity		Moderate Opportunity		High Opportunity		Very High Opportunity		Total
	#	%	#	%	#	%	#	%	#	%	#
Developments Assisted by HUD and/or Tax Credits	**175**	**32.8%**	**157**	**29.4%**	**97**	**18.2%**	**50**	**9.4%**	**55**	**10.3%**	**534**
Public Housing Developments	31	45.6%	18	26.5%	11	16.2%	2	2.9%	6	8.8%	68
LIHTC Developments	100	36.0%	90	32.4%	44	15.8%	19	6.8%	25	9.0%	278
Other Types	44	23.4%	49	26.1%	42	22.3%	29	15.4%	24	12.8%	188
USDA-Assisted Developments	**6**	**19.4%**	**5**	**16.1%**	**9**	**29.0%**	**8**	**25.8%**	**3**	**9.7%**	**31**
Units Assisted by HUD and/or Tax Credits	**8,012**	**38.2%**	**4,815**	**22.9%**	**4,155**	**19.8%**	**1,961**	**9.3%**	**2,048**	**9.8%**	**20,991**
Public Housing Units	3,092	45.4%	1,044	15.3%	1,388	20.4%	230	3.4%	1,057	15.5%	6,811
LIHTC Units	3,025	40.8%	1,378	18.6%	1,531	20.6%	951	12.8%	532	7.2%	7,417
Other Types	1,895	28.0%	2,393	35.4%	1,236	18.3%	780	11.5%	459	6.8%	6,763
USDA-Assisted Units	**222**	**18.3%**	**164**	**13.5%**	**368**	**30.3%**	**298**	**24.5%**	**162**	**13.3%**	**1,214**

1 This total does not include all public housing units in the region.

While a fair amount of housing is located in moderate-opportunity areas, the areas with the highest opportunity scores contain very few assisted rental housing developments. This pattern is problematic from a fair housing perspective because it means that high-opportunity areas and the community assets located within them may be out of reach for many low-income residents.

Assisted housing is also located disproportionately in RCAPs or near-RCAPs. While RCAPS and near-RCAPs represent only 15.9% of the block groups in the Piedmont Triad, they contain 51.2% of the assisted housing developments and 63.3% of the assisted housing units in the region. Public housing in particular is concentrated in RCAPs, due largely to prevailing federal policies at the time of most of its construction beginning decades ago. This is problematic because RCAPs and near-RCAPS typically have limited job access, fewer local employment options, are more likely to be marginalized, and are strongly correlated with low opportunity scores. While the presence of public housing does raise the number of persons living in poverty and the number of minorities in the block group, the pattern is likely self-perpetuating.

The strongest association between low opportunity and high concentration of assisted housing can be found in Greensboro, where 135 of the 211 public housing developments are in either an RCAP or near-RCAP. This equates to 63.9% of all assisted housing developments in Greensboro. While Burlington has no RCAPs, 13 out of its 18 assisted housing developments are in either a near-RCAP area or a high-poverty area. In High Point, 17 out of 53 public housing developments (26.4%) are in either an RCAP or near-RCAP, and the number rises to 23 developments (43.3%) including the high-poverty area in the southeast section of the city. This distribution is relatively more equitable, although three of the five largest developments in High Point are in RCAP areas. Exceptions to this trend can be found in Surry, Davie, and Yadkin Counties, where public housing is located in or very near high-opportunity areas and there are no RCAPs or near-RCAPs.

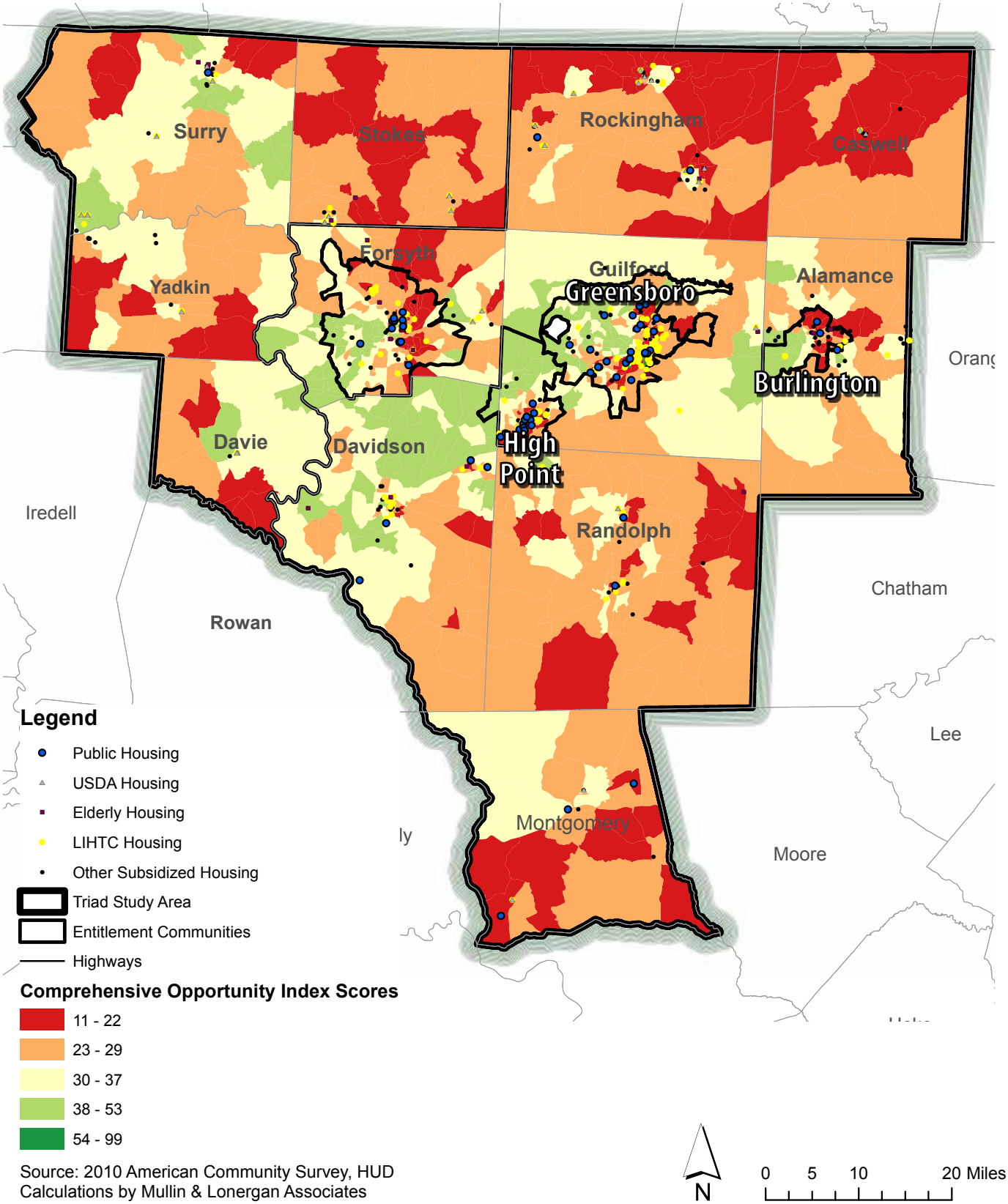
Nearly two-thirds of the 21,063 subsidized housing units in the region are concentrated in RCAP or near-RCAP areas.

Figure 60 : Assisted Housing Locations in RCAPs and near-RCAPs, 2012

	RCAP		Near-RCAP		Total
	#	%	#	%	#
Developments Assisted by HUD and/or Tax Credits	**106**	**19.7%**	**169**	**31.5%**	**537**
Public Housing Developments	20	29.4%	29	42.6%	68
LIHTC Developments	65	23.2%	100	35.7%	280
Other Types	21	8.2%	40	15.6%	257
USDA-Assisted Developments	**0**	**0.0%**	**2**	**6.5%**	**31**
Units Assisted by HUD and/or Tax Credits	**5,486**	**26.0%**	**7,864**	**37.3%**	**21,063**
Public Housing Units	2,732	40.1%	3,452	50.7%	6,811
LIHTC Units	1,264	16.9%	2,127	28.5%	7469
Other Types	1,490	11.0%	2,285	16.8%	13,594
USDA-Assisted Units	**0**	**0.0%**	**80**	**6.6%**	**1,214**

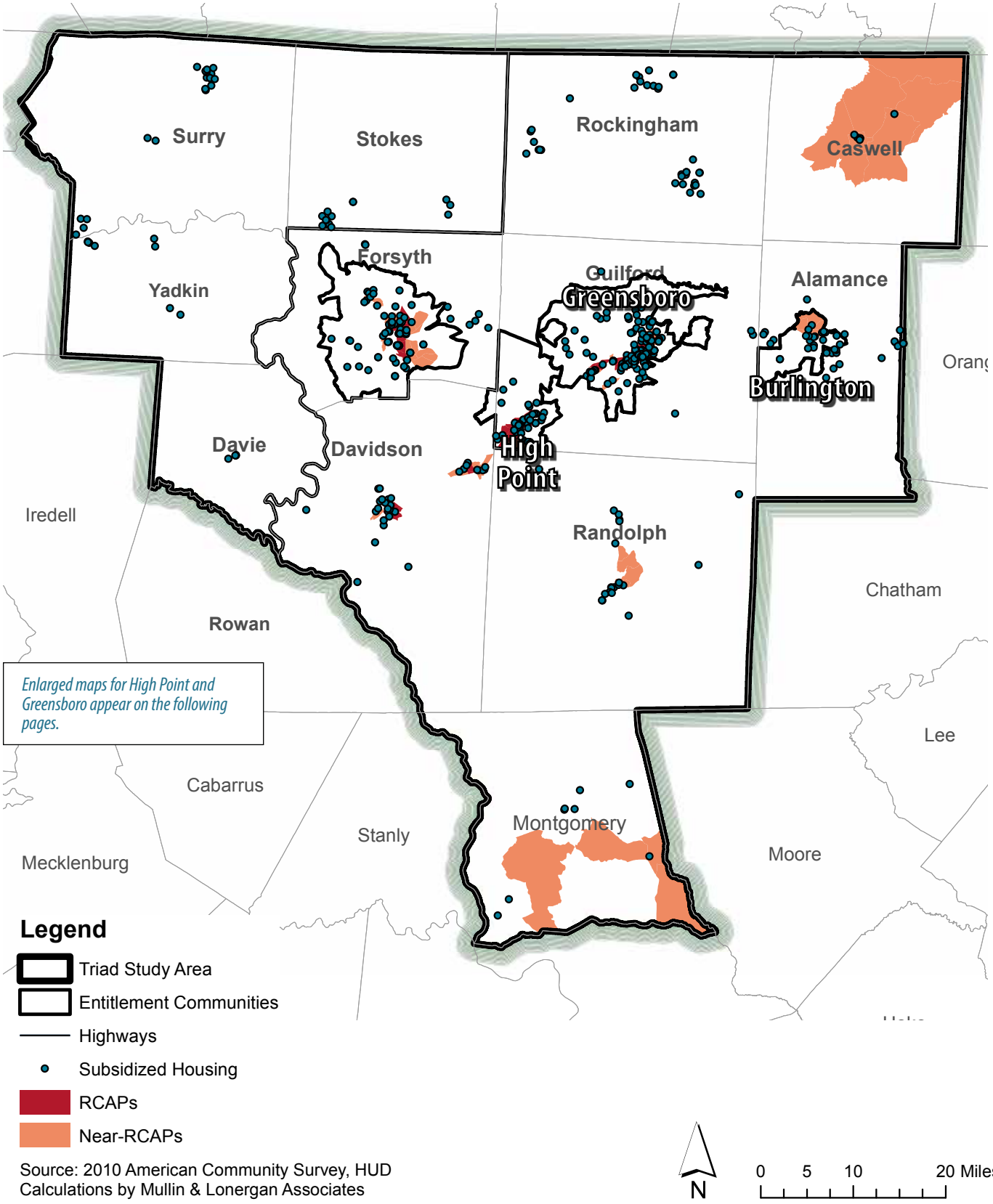
Source: PTRC, HUD, ACS 2012
Calculations by Mullin & Lonergan Assiciates

MAP 38:
LOCATION OF ASSISTED HOUSING INVENTORY



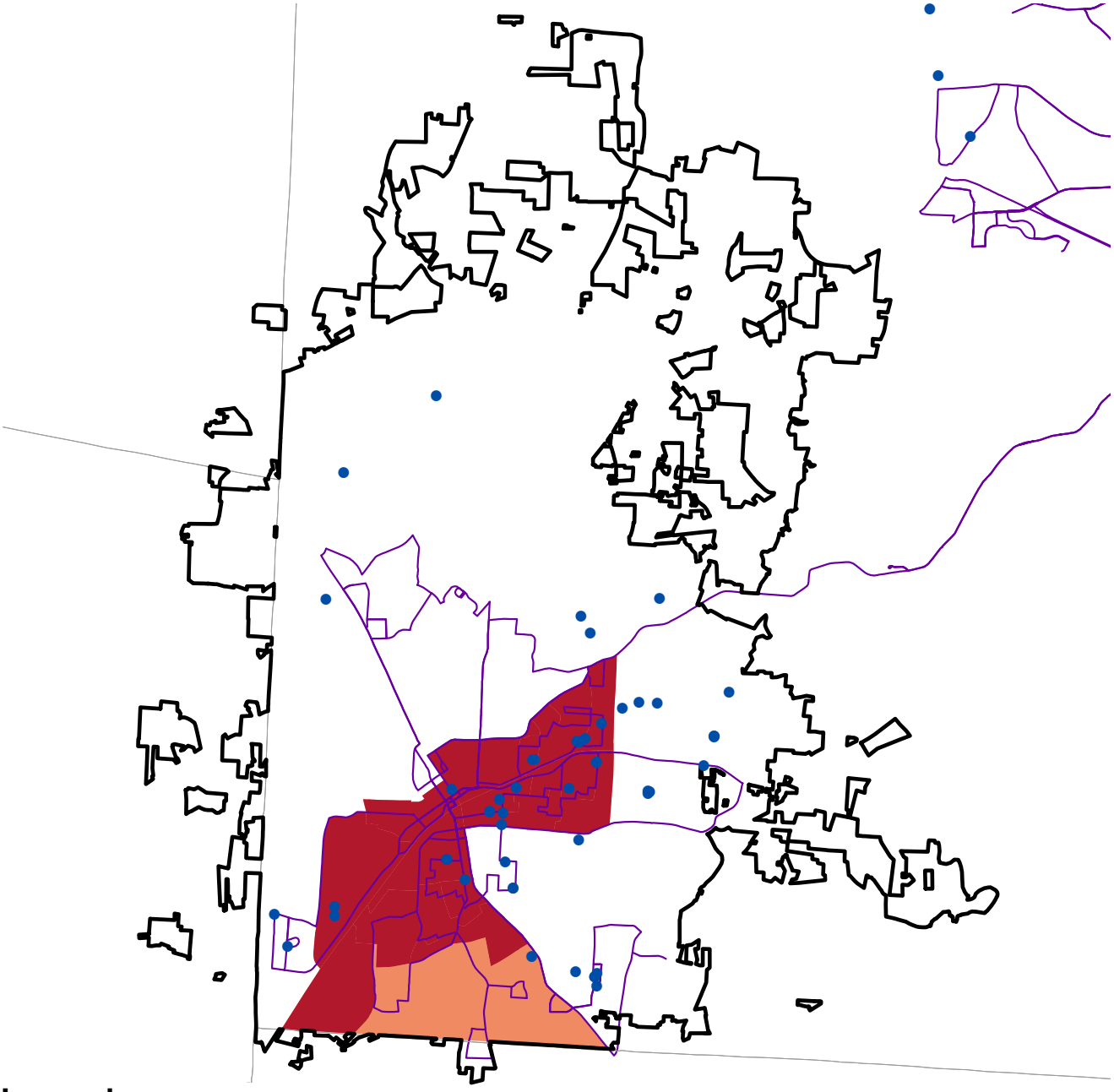
Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 39: CONCENTRATION OF ASSISTED HOUSING INVENTORY IN RCAPS AND NEAR-RCAPS



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 40:
DETAIL: CONCENTRATION OF ASSISTED HOUSING INVENTORY IN RCAPS AND NEAR-RCAPS IN HIGH POINT



Legend

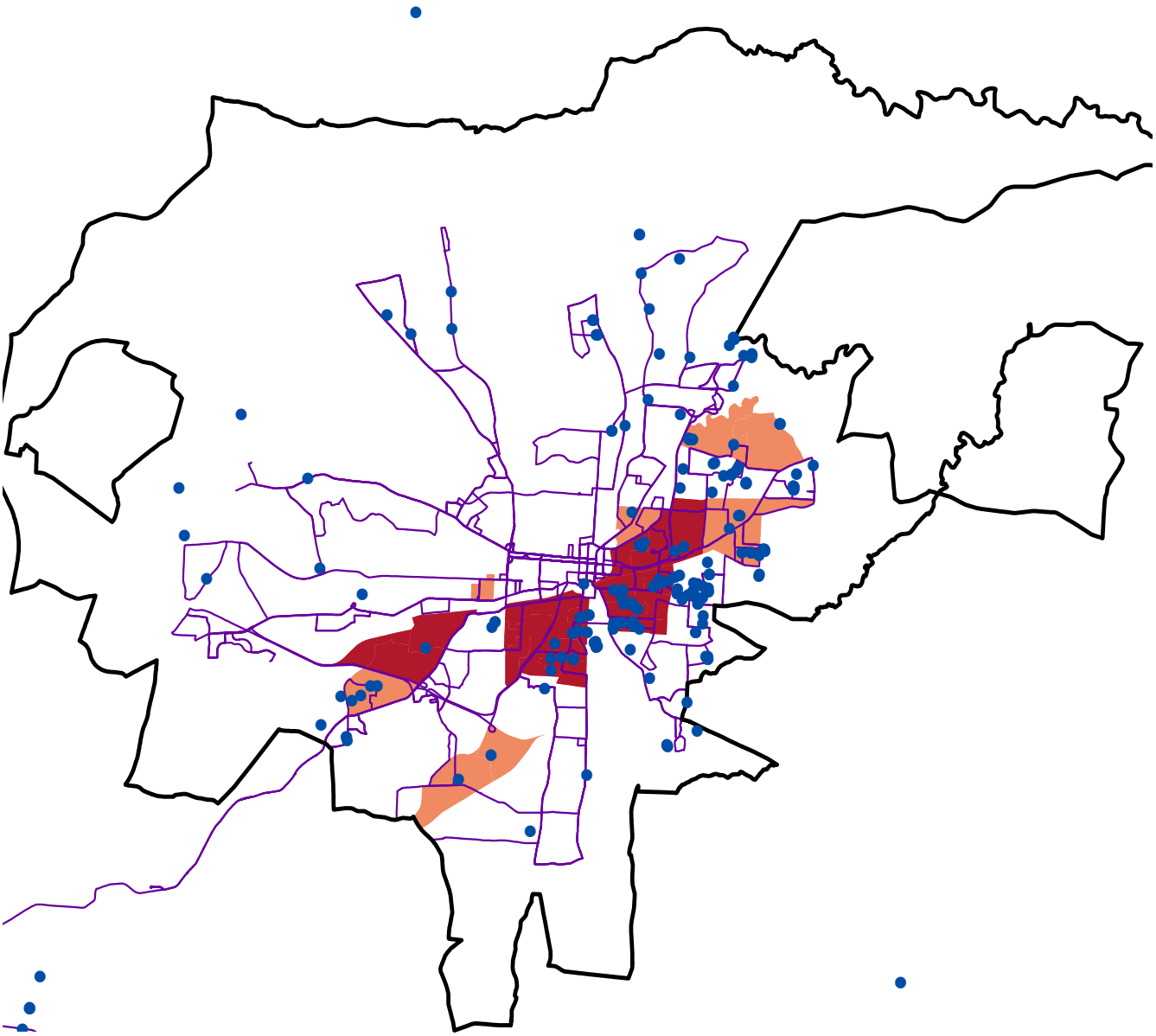
- Subsidized Housing - All
- RCAPs
- Near-RCAPs
- High Point Urban Boundary
- Bus Routes

Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 0.5 1 2 Miles

MAP 41:
DETAIL: CONCENTRATION OF ASSISTED HOUSING INVENTORY IN RCAPS AND NEAR-RCAPS IN GREENSBORO



Legend

- Subsidized Housing - All
- RCAPs
- Near-RCAPs
- Bus Routes
- Greensboro CDBG Boundary

Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

N

0 0.5 1 2 Miles

As illustrated in the following map, Section 8 voucher holders in High Point tended to cluster in areas of lower opportunity. Nearly 60% of all voucher holders in High Point lived in an area with a very low or low opportunity score. Conversely, only 33.5% of voucher holders lived in an area with high or very high opportunity score. In addition, 22.8% of voucher holders in High Point lived in an RCAP. The largest clusters of Section 8 voucher holders were in the east and south sections of the city.

In the Surry HOME Consortium, Section 8 vouchers were more evenly distributed across opportunity levels but still had a disproprotionate number of households in low-opportunity areas. Of all voucher holders, 43.3% lived in areas with very low or low opportunity scores. Only 33.5% of Section 8 voucher holders lived in areas with high or very high opportunity scores. Since there are no RCAPs or near-RCAPs in the four-county area, none of the residents lived in an RCAP.

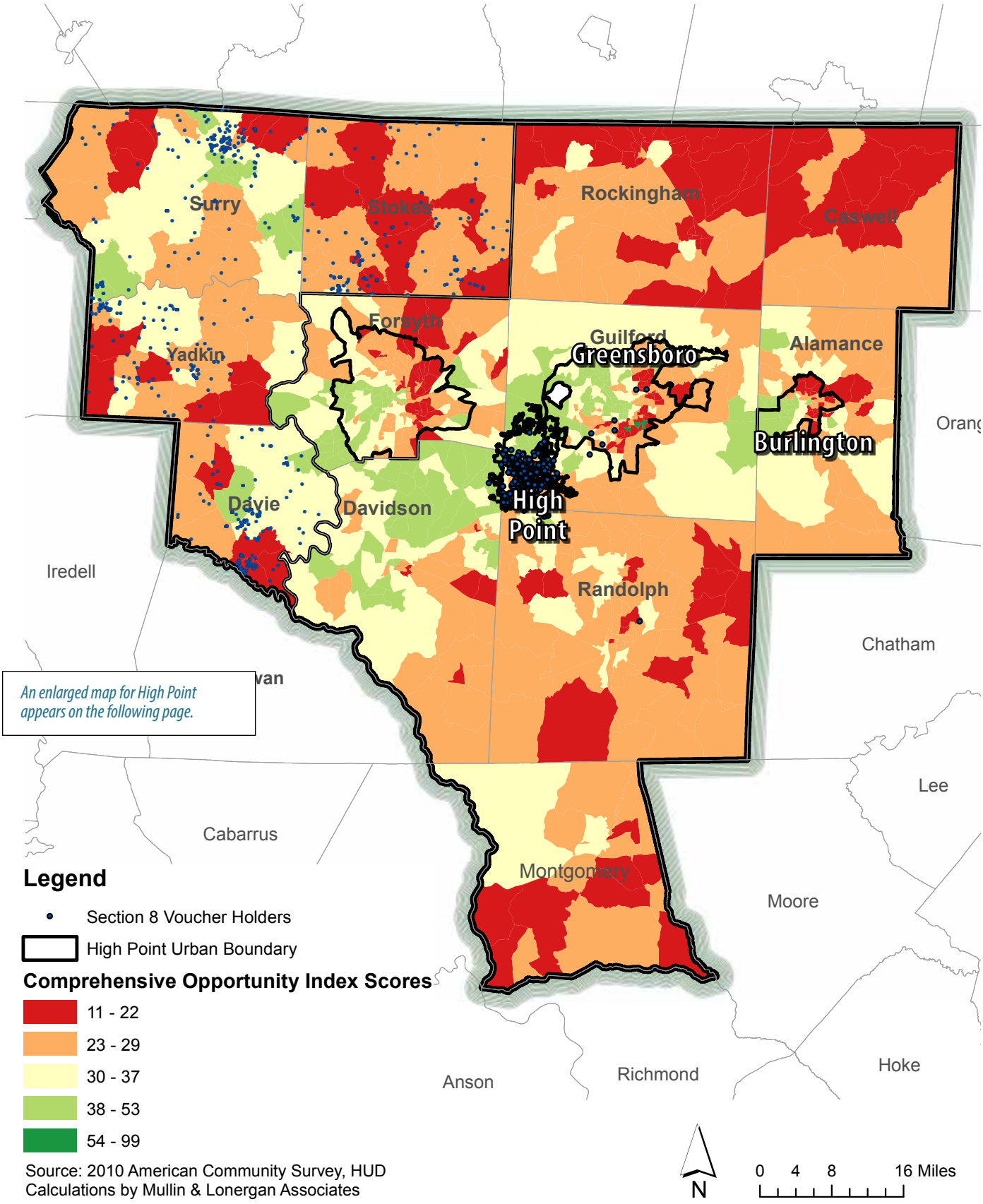
Data from Burlington and Greensboro housing authroities was not available at the time of this analysis.

Figure 61 : Location of Section 8 Voucher Holders by Opportunity Level, 2012

	Voucher Holders, Very Low Opportunity Areas		Voucher Holders, Low Opportunity Areas		Voucher Holders, Moderate Opportunity Areas		Voucher Holders, High Opportunity Areas		Voucher Holders, Very High Opportunity Areas	
	#	%	#	%	#	%	#	%	#	%
High Point Housing Authority	371	26.0%	485	33.9%	306	21.4%	125	8.7%	106	7.4%
Surry HOME Consortium	143	18.7%	188	24.6%	176	23.1%	153	20.1%	102	13.4%

Source: Piedmont Triad Regional Council

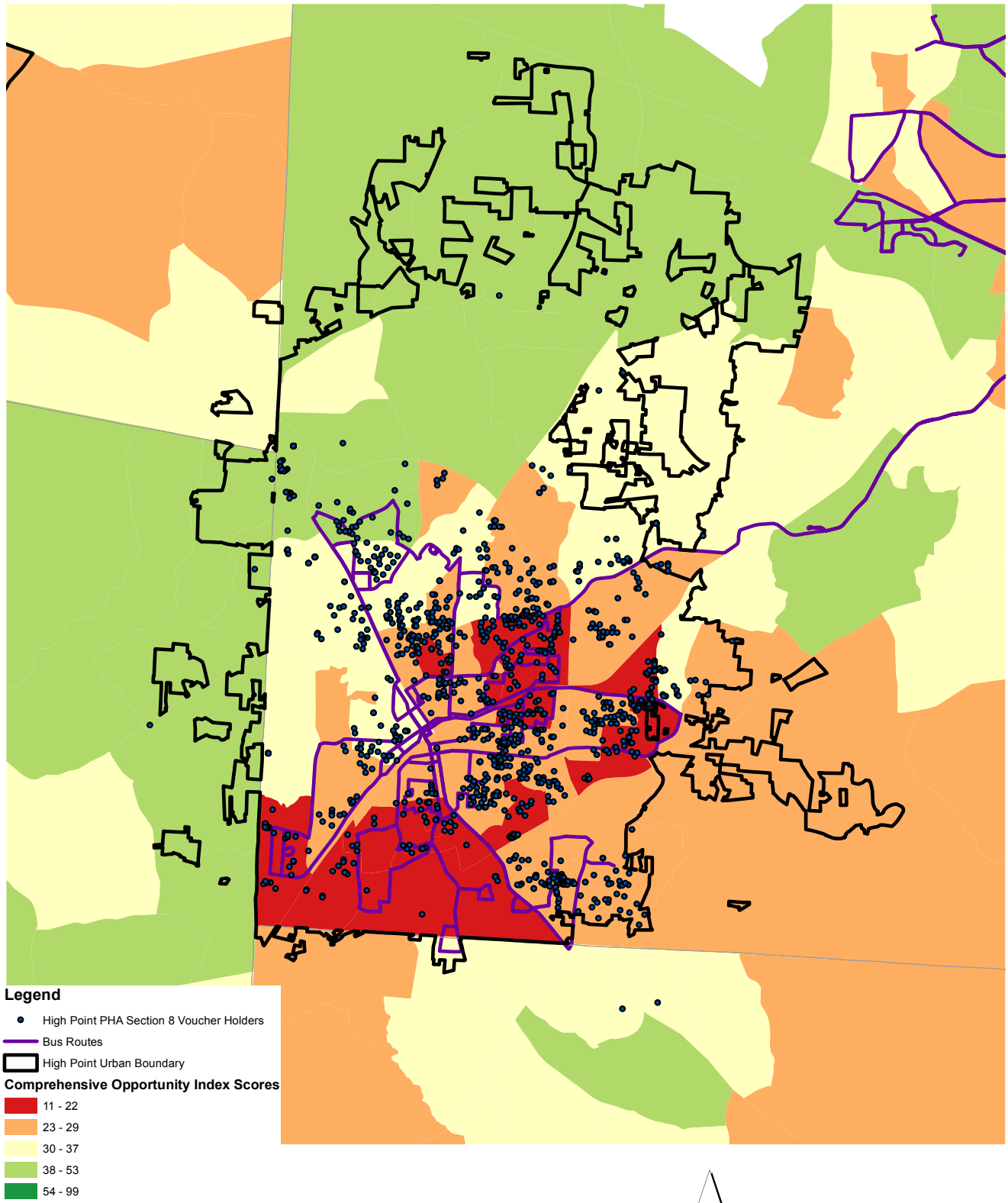
MAP 42:
HOUSING CHOICE VOUCHER LOCATIONS:
HIGH POINT AND SURRY HOME CONSORTIUM



An enlarged map for High Point appears on the following page.

Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

MAP 43:
HOUSING CHOICE VOUCHER LOCATIONS:
HIGH POINT DETAIL



Source: 2010 American Community Survey, HUD
Calculations by Mullin & Lonergan Associates

PUBLIC HOUSING AUTHORITIES

The following agencies own and operate public housing in the Piedmont Triad region. Some additionally administer Section 8 Housing Choice Voucher programs, self-sufficiency programs and other means of providing decent, affordable housing to lower-income populations.

Public housing authorities are critical to regional fair housing strategies, as the lower-income populations they serve disproportionately represent members of the protected classes. Like other agencies receiving HUD funding, public housing authorities must certify that they will affirmatively further fair housing choice, so their policies and actions must be clearly rooted in this aim. It is a consideration that matters in tenant selection and waiting list policies, in the placement of tenants in units, in the siting of new housing opportunities, in voucher program policies, in the grievance process and in potential evictions, among other issues.

On a national level, in the 1950s and 1960s site selection policies for slum clearance and the construction of public housing became another means of lending official sanction to methods of perpetuating segregation. Urban renewal projects resulted in the displacement of tens of thousands of Black residents, the poorest of whom were relocated into high-density, high-rise public housing located in historically Black neighborhoods. The federal government today holds housing authorities across the county responsible to proactively address the vestiges of segregation.

Additionally, public housing authorities are required to meet Section 504 standards for physical accessibility, which stipulate that 5% of the inventory must be accessible for persons with mobility impairments and an additional 2% must be accessible for persons with sensory impairments. Therefore, public housing often represents a primary housing source for lower-income people with disabilities.

While a full policy review for each authority within the region exceeds the scope of this report, it is important to acknowledge the importance of housing authorities in determining the location and quality of housing opportunities available to the region's lowest-income residents.

Data collection for this report included a survey distributed to each public housing authority. Specific characteristics of residents, applicants and inventory, to the extent information was provided, appear in Appendix D.

Asheboro Housing Authority

The Housing Authority of the City of Asheboro owns and operates 1,500 units of public housing in 10 developments throughout the city. The Authority also manages a voucher program that provides subsidy for more than 1,350 households to secure a unit on the private market. The waiting list for a voucher in Asheboro is closed to new applications until further notice.

Burlington Housing Authority

Burlington Housing Authority owns and maintains 468 units within seven communities (five multi-family and two elderly) throughout the city. The Authority has a 501(c)3 nonprofit development arm, formed in 1982, that engages or assists in development, financing and operation of low-income housing and provision of supportive services.

Greensboro Housing Authority

Greensboro Housing Authority owns and maintains 2,209 units of public housing across 19 developments within the city. Developments range in size from 11 units to 430 units and include both elderly and family housing options. The Authority also manages a voucher program, although the waiting list is currently closed.

Graham Housing Authority

Graham Housing Authority operates and maintains 171 public housing units, all of which are in Graham, located mostly near or attached to the Authority offices. Units range in size from one to four bedrooms. They were built primarily in low- and moderate-income areas of Graham in the early 1970s. There are no longstanding vacancies, and the turnover for a unit is one to two days. The largest public housing development in the Authority's inventory is Ralph Clayton Homes, a 60-unit development for the elderly and/or disabled.

Graham Housing Authority also administers 1,005 vouchers. The Authority is currently not issuing any new vouchers; the waiting list has been closed since April 2014.

Housing Authority of the City of High Point

The city's housing authority owns and maintains 1,132 public housing units within 15 developments. It also administers 1,484 tenant-based vouchers and 101 project-based vouchers. Additionally, the agency operates housing counseling and other supportive service programs. The Authority also operates a non-profit organization that provides housing and homeownership opportunities to city residents. The voucher waiting list is currently closed.

Lexington Housing Authority

Lexington Housing Authority owns and maintains three public housing developments with a total of 268 units. It also administers Section 8 vouchers. The Authority is currently conducting a large-scale inventory renovation made possible with $27 million allocated as part of the HUD Rental Assistance Demonstration program.

Mt. Airy Housing Authority

Mt. Airy Housing Authority currently has 300 public housing units between four multi-unit developments. The Authority does not administer a Section 8 voucher program.

DESIGN AND CONSTRUCTION STANDARDS

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

Other requirements apply, such as Section 504 of the Rehabilitation Act of 1973 and the federal Fair Housing Act, which requires that certain residential structures having at least four multi-family dwelling units – regardless of whether they are privately owned or publicly assisted – include certain features of accessible and adaptable design to HUD standards.

While local jurisdictions in many other states adopt and enforce their own building codes, the North Carolina Building Code is adopted at the state level and applied uniformly across all jurisdictions. The state does not allow any local building code amendments. Most importantly, the state does not allow any local variance procedure or local board of appeals; counties and municipalities may only interpret the code as provided by the state.

From a fair housing perspective, this is advantageous because developers of affordable housing can depend on consistent standards no matter where they choose to locate. Additionally, accessibility standards apply equally to all areas.

The North Carolina Building Code contains standards for the accessibility of private housing structures that are consistent with UFAS and ADA accessibility guidelines, as well as International Code Council/American National Standards Institute (ICC/ANSI) accessibility provisions. The code identifies residential buildings that must comply with accessibility requirements.

Each local jurisdiction ensures compliance with state and federal accessibility statutes through construction plan review and field inspections.

LANGUAGE ACCOMMODATION

Persons with limited English proficiency (LEP), including immigrants, may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers.

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination based on their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons with LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination. Furthermore, recipients of federal financial assistance must develop a plan for persons with LEP to ensure that they have meaningful access to all portions of their programs or activities, not just those portions that receive HUD funds (e.g. non-federally funded programs). This is called a Language Access Plan (LAP).

According to HUD, vital documents should be translated into other languages spoken in the area when both:

- More than 1,000 persons in the eligible population or among current beneficiaries have LEP, and
- More than 5% (or at least 50 persons) of the eligible population or beneficiaries have LEP.

Vital documents include any document that is critical for ensuring meaningful access to the recipient's major activities and programs by beneficiaries generally and persons with LEP specifically. Determining whether or not these criteria are fulfilled is known as a safe harbor calculation.

One measurement of persons with LEP is the degree to which persons over the age of 5 years speak English. The Census reports on the number of persons who speak English "very well," "well," "not well," and "not at all" by language category.

Despite the prevalence of persons with LEP and the increased diversity among the Piedmont Triad's population, some areas have established very few provisions to accommodate persons with limited English proficiency. Many of the area's local government publications and other materials are not available in Spanish. While the responsibility of identifying which documents are considered "vital documents" is left to local government, fair housing materials should be included.

The following table presents the results of a safe harbor calculation to determine the eligible population for persons with LEP in the cities of Burlington, Greensboro, High Point, and the Surry HOME Consortium. While Spanish is by far the most widely-spoken language after English in all parts of the Piedmont Triad region, other languages

Figure 62 : Safe Harbor Calculation

	Burlington		Greensboro		High Point		Surry HOME Consortium	
	#	% of Total	#	% of Total	#	% of Total	#	% of Total
Total Population	46,869		253,100		96,696		188,783	
Speaks only English	40,023	85.39%	218,907	86.49%	82,593	85.42%	175,218	92.81%
LEP Spanish Speakers	2,924	6.24%	8,348	3.30%	3,816	3.95%	6,550	3.47%
LEP Urdu Speakers	0	0.00%	63	0.02%	340	0.35%	0	0.00%
LEP Chinese Speakers	69	0.15%	621	0.25%	187	0.19%	26	0.01%
LEP Vietnamese Speakers	159	0.34%	2,078	0.82%	577	0.60%	9	0.00%
LEP Arabic Speakers	0	0.00%	656	0.26%	157	0.16%	61	0.03%
LEP African Language Speakers	0	0.00%	940	0.37%	240	0.25%	0	0.00%
LEP French Speakers	11	0.02%	482	0.19%	223	0.23%	32	0.02%

Source: ACS 2012

Figure 63 : Safe Harbor Recommendations

	Translation Action Recommended
Total Population	
Speaks only English	
LEP Spanish Speakers	Translate vital documents; all areas
LEP Urdu Speakers	
LEP Chinese Speakers	
LEP Vietnamese Speakers	Translate vital documents; Greensboro
LEP Arabic Speakers	
LEP African Language Speakers	
LEP French Speakers	

with high numbers of LEP speakers are also shown for reference. This calculation provides insight as to the potential need for the translation of vital documents in particular languages. The estimated eligible population for each language group is based on the assumption that 100% of persons with LEP are potential recipients of city or regional services. Further analysis may reveal a smaller number. No safe harbor is assumed for oral interpretation.

As the table shows, there is a need to translate vital documents from English to Spanish in Burlington, Greensboro, High Point, and the Surry HOME Consortium, as the number of persons who speak Spanish fluently and English either "not well" or "not at all" exceeds the 1,000-person threshold set forth by HUD in all areas. There are also a high number of LEP Vietnamese-speakers located in Greensboro. This population is large enough that translation of vital documents, including fair housing materials, into Vietnamese is recommended. Stakeholders interviewed mentioned that the Vietnamese community in the Piedmont region was generally lower-income and less assimilated than other Asian ethnicities. The high number of Vietnamese-speakers with LEP is consistent with this view.

Figure 64 : Policy for Persons with LEP

	Burlington	Greensboro	High Point	Surry HOME Consortium
Identified Specific Languages with 1,000+ Speakers	No	Yes	Yes	No
Formal policy or LAP describing how persons with LEP will be provided access to services and programs	No	Yes	Yes	Surry and Yadkin Counties: Yes. Stokes and Davie Counties: No.

LEP Policy: Surry HOME Consortium

Surry and Yadkin Counties both participate in the CDBG program and therefore have LAPs in place. The Consortium's 2011 Analysis of Impediments identified language as a significant problem in accessing information throughout the four-county area. The report recommended distributing information on fair housing, filing complaints, and housing opportunities at sites offering English as a Second Language (ESL) education, churches that conduct non-English services, and ethnic businesses in the area. However, in county-wide studies, data on persons with LEP and efforts to distribute fair housing materials were not documented.

LEP Policy: Greensboro

Greensboro's Language Access Plan was created in 2010 in order to allow greater access to city programs and services for its international residents. Fair housing information is included in its definition of vital documents. Departments are required to provide free language assistance in various languages that is routinely disseminated to the public in any form. Under the guidelines of the LAP, the City is also obligated to determine the language needs of the population they serve, provide multilingual/interpretative materials and services, and provide written translations when there is a substantial need. While all departments and divisions in the City of Greensboro's municipal government are expected to comply with the LAP, 17 particularly pertinent departments (including Planning and Community Development, Human Resources, and Human Relations) are designated a Title VI program liaison. This liaison is responsible for ensuring compliance, program monitoring, reporting, and education within their respective departments with regard to the LAP.

In addition to Greensboro's LAP, public notices, including Requests for Human Service Proposals for the Consolidated Plan's citizen participation plan, are posted in Spanish in the non-legal section of the Spanish-language "Bilinguel News". Greensboro's Human Relations Department occasionally sponsors free fair housing educational workshops targeted toward persons with LEP, including one in 2011 for Sudanese and other Arabic-speaking populations.

The City of Greensboro also has an Affirmative Marketing Policy, which is designed to reach both mainstream and under-served populations, provide information, and attract eligible persons to the available housing. The Affirmative Marketing Policy applies to all rental and homebuyer projects with five or more HOME-assisted units. However, it does not explicitly state limited English proficiency as a barrier to fair housing or put forth any marketing methods to accommodate persons with LEP.

LEP Policy: Burlington

In its 2015 Annual Action Plan, the City of Burlington states that "for non-English speaking residents, the City will arrange for the translation of basic information into the appropriate language. The City Human Resources Department has an inventory of available interpreters and will provide the interpreter's assistance on a one-to-one basis upon request". All aspects of citizen participation are conducted in an open manner with freedom of access for all interested persons. Non-English speaking persons are included as a priority demographic for releasing information about public hearing and comment periods.

However, the City of Burlington does not have a Language Access Plan. It also has not identified languages with over 1,000 speakers in its most recent AI, Annual Plan, CAPER, or other official community development report. Burlington leaves language accommodation up to the discretion of individual departments, which conduct their own outreach and inclusion efforts to the populations they serve. The Community Development Division, for example, publishes fair housing materials in both English and Spanish. It also publishes its CDBG-funded rehabilitation program brochure in Spanish.

LEP Policy: City of High Point

The presence of World Relief — a non-profit refugee resettlement organization — has brought a high level of linguistic diversity to the City of High Point. At last count there were 102 spoken languages throughout the City's school system.

Increasing access to information amongst persons with LEP regarding fair and affordable housing resources is stated as a priority in High Point's 2012-2013 CAPER. Stakeholders including local realtors interviewed in the 2012 AI identified the need for more fair housing information to be made available in languages other than English for High Point's LEP population. In response, High Point has expanded its collaboration with World Relief and Lutheran Refugee Services, the two organizations most connected to High Point's LEP population. Fair housing brochures and other materials are now available in other languages, although they are not available online and may not accommodate large segments of the City's diverse LEP population. The City does provide translation services as needed.

Stakeholder interviews revealed that language barriers also affected the private sector housing market. Households with LEP seeking a mortgage have a difficult time finding banks where staff will speak their language. This is particularly true for the less common languages spoken by refugees such as Nepali, Arabic, African tribal languages, and Urdu. Often, heads of households with LEP will bring their children in to interpret at the bank. This is problematic for explaining the complex and detailed process of applying for a mortgage and purchasing a home.

High Point has a LAP effective January 1, 2014. The LAP requires all vital documents to be translated into Spanish, and that the Community Development and Housing Department will continuously identify the language needs of the clientele they serve in order to maintain effective language assistance. If a LEP population reaches the HUD-specified thresholds of 1,000 persons or 5% of the population, materials will be translated into that language as well. Data on language will come from the ACS, the City school system, government reports, community agency information, and from client files. If individuals with LEP require an interpreter, one will be provided free of charge. If individuals with LEP want to file a fair housing complaint but lack the English skills necessary to do so, the City will provide assistance throughout the process and maintain records of any complaints filed. The LAP provides detailed descriptions and regulations regarding interpreter standards, how to determine language need, and other standards.

FAIR HOUSING PROFILE

Greensboro

Local Human Rights/Fair Housing Ordinance

The City of Greensboro has a Fair Housing Ordinance that secures residents' freedom from discrimination in housing based on race, color, religion, national origin, gender, handicap, and familial status. Familial status includes all families with children under 18 including single parents, adopted children, and pregnant women. The ordinance makes it illegal for anyone to discriminate in any public or private residential real estate transaction, including buying, selling, renting, financing, and advertising. If housing discrimination is found, the law provides for an award of monetary damages to the victim or an order stopping the discrimination.

Human Relations Commission

The Human Relations Department of the City of Greensboro investigates, mediates, and when needed, prosecutes fair housing cases. In fiscal year 2012-13 the Greensboro Human Relations Department investigated 6 fair housing complaints. The Fair Housing division provided assistance to a wide range of callers and trained 1,000 individuals in fair housing law.Within the City of Greensboro's Human Relations Department, there is a special Fair Housing Division. This division enforces the City's Fair Housing Ordinance, investigates complaints of fair housing discrimination, and offers mediation and conciliation for these disputes. Both agencies work in tandem with the Commission on the Status of Women, which seeks to address institutional inequalities amongst women in the City.

Guilford County is the only county in the study area that has a Human Relations Commission certified under HUD's Fair Housing Assistance Program (FHAP). Designation as a FHAP is achieved when a jurisdiction's ordinance is determined to be substantially equivalent to the federal Fair Housing Act. As a result of this designation, the City of Greensboro can seek reimbursement from HUD for the services provided that assist in carrying out the spirit and letter of the federal Fair Housing Act. A variety of FHAP funds are available to agencies with substantial equivalency, including complaint processing, training, implementation of data and information systems, and other special projects.

Testing

Testing in Greensboro occurred in 2008 and 2012. The testing performed in May 2008 resulted in a report entitled "Discrimination in Immigrant Housing: A Pilot Paired Testing Project in Greensboro, NC." This report was prepared by the UNCG - Department of Sociology and included White/Latino as well as White/Black paired tests. Paired testing involves having two applicants with the exact same characteristics — except for their race, ethnicity, or other unit of analysis — inquire to real estate offices about the same properties. The study found significant evidence of steering towards or away from certain neighborhoods in Greensboro based on race.

Paired testing in Greensboro has revealed discrimination based on race.

White testers were generally steered away from minority neighborhoods or informed of the neighborhood's racial composition as a warning. Black testers were often blocked from access to available properties. Hispanic testers were often shown preference. Blacks were also given less time to discuss the property on the pre-visit phone call and were more likely to have their inquiries go unreturned.

This paired test revealed statistically significant discrimination based on race and ethnicity in the Greensboro rental housing market. While the preference for Hispanics is notable, it may be explained by the selective sample of the study: the Hispanic testers were predominantly bilingual professionals and were not representative of the recent migrants that compose the majority of the Hispanic community in North Carolina. In one paired test, a Black tester was told that he must submit to screening and have a deposit ready in hand, while the White tester inquiring about the same property was promptly shown it with none of those conditions.

In 2012, Sills Consulting conducted another round of paired testing to re-evaluate discrimination within the rental market in Greensboro. White testers often had more access to the property and were given more favorable rents, while Black testers were more rigorously evaluated and less encouraged to visit the property. White female testers were steered away from neighborhoods in southeast Greensboro and steered towards north and northwest Greensboro. Black and Asian testers are less likely than Whites to have phone calls returned or be allowed to tour the property. Hispanic testers were asked questions about their legal status and family composition. The results of this testing, completed four years after the last round, indicates minimal change in private-sector practices in Greensboro's rental housing market.

The City of Greensboro Human Relations Department, in partnership with local housing advocates, is taking steps for re-testing in the future to make sure progress has been made because education is the best defense in keeping fair housing violations from occurring. However, no funds have been secured.

Summary of Housing Discrimination Complaints

During FY 2013-2014, there were nine fair housing cases filed with HUD and investigated. Of these nine complaints, more detailed data is available for eight of them. Six were filed on the basis of disability, one was filed on the basis of race, and one was filed on the basis of both familial status and national origin. Four of the eight complaints are still under open investigation, one complaint underwent successful conciliation, one was withdrawn after successful resolution, one was closed after a no-cause determination, and one was closed because the client failed to cooperate. More detailed data on the ninth complaint is not readily available.

Progress since Previous AI

The City of Greensboro's last AI was conducted in 2008. The analysis identified the need to promote equitable, affordable housing in order to address the impediment of rising housing costs and stagnating wages. Because the recommendations put forth in the 2008 AI were more thematic than prescriptive, it is difficult to assess progress. However, a rigorous level of benchmarking and tracking of progress is achieved in the City's Consolidated Annual Performance Evaluation Report (CAPER). The CAPER outlines annual progress towards accomplishing the recommendations and overcoming the impediments identified in the AI.

Since the 2008 AI, the City has undertaken several active housing projects. This includes a Citywide Housing Rehabilitation Program, Citywide Lead Paint Hazard Remediation, HOME subsidies for multi-family development (specifically, the Terrace at Rocky Knoll and Peacehaven Farm), single family development, and homebuyer subsidies. The Better Buildings for Greensboro Program improved the energy-efficiency of 365 residential units in 2012-13 and has reached 547 cumulative units. CDBG funds were used for minor repairs in 7 units in order for them to be eligible for the Better Buildings program.

Another impediment identified was a general lack of understanding of fair housing amongst citizens, particularly the protected classes most vulnerable to discrimination. In order to address this, the City of Greensboro's Human Relations Department conducted outreach training for 12 real estate management companies. A Fair Housing Education and Outreach program was continued specifically for immigrant communities in Greensboro. In April 2013, the Department hosted its annual Fair Housing Month event with over 80 attendees. National guest speakers highlighted issues regarding fair housing and foreign nationals and rights for persons with disabilities under the Fair Housing Ordinance and federal Fair Housing Act.

The high cost of rental housing in Greensboro was another impediment that the City has worked to address. In FY 2012-2013, the City utilized its HOME funding to help create 37 affordable rental units between three projects. In FY 2011-2012, the City assisted in the development of 87 affordable rental units between six projects. The lack of affordable rental units in northwest Greensboro was specifically cited. However, according to the City's CAPERs, most affordable rental housing projects have not been located in northwest Greensboro because those areas are not CDBG-eligible. Affordable housing units remain concentrated in south and southeast Greensboro. These areas are predominantly RCAP or near-RCAP areas, and are predominantly located in areas with low or very low opportunity scores.

A lack of data on discriminatory behavior was identified as an impediment to making appropriate fair housing policy. This was true especially regarding the HMDA data for Greensboro from 2006-2008, which the AI described as particularly error-prone and unreliable. This time period was also during the collapse of the housing market, making these results atypical of how the Greensboro market might have been performing. In December 2011, the Human Relations Department won a HUD Partnership grant and awarded a contract to Sills Consulting to conduct enforceable fair housing testing. This has increased knowledge of discriminatory practices and increased the capacity for informed policymaking in Greensboro.

In order to overcome both limited access to fair housing and high rates of LMI concentration, the City of Greensboro has initiated an Affirmative Marketing policy. This policy is designed to reach both mainstream and under-served populations. The policy's goal is to provide information and attract eligible persons who are the least likely to apply for affordable housing. All rental properties that have a HOME or CDBG investment are monitored annually and the marketing practices are reviewed. While a comprehensive evaluation of the policy has not yet occurred, affordable housing specialists spoke of it favorably during stakeholder interviews.

Burlington

Local Human Rights/Fair Housing Ordinance

Neither the City of Burlington nor Alamance County currently has a human rights or fair housing ordinance in place.

Human Rights Commission

Within the City of Burlington, the North Carolina Human Relations Commission is responsible for the enforcement of fair housing laws, undertaking the mediation/conciliation and litigation of fair housing complaints, and enforcing the North Carolina State Fair Housing Act.

The City of Burlington's Human Resources Department is responsible for ensuring City compliance with all applicable federal and state employment laws, advertising employment opportunities within the City, and accepting applications for available vacancies.

The Alamance County Human Relations Council (ACHRC) enforces fair housing regulations at the County level. In addition to housing, the ACHRC handles employment, education, and LGBT resources. They have also expanded the regulations to include sexual orientation, although there is no county ordinance protecting gays and lesbians. Any citizen or group has the right to take part and be on the ACHRC agenda. The ACHRC explores possibilities with people regarding discrimination, but very few people come to them with complaints. When they do, the ACHRC usually refers Burlington residents with complaints to the local Legal Aid office. The ACHRC has a good working relationship with Legal Aid, and recently worked with them to co-sponsor two workshops on fair housing with a total of 50 residents attending.

The ACHRC formally split from the Alamance County Commissioners in February of 2014. In the past, the county had allocated about $1,500 annually to the ACHRC. Alamance County Commissioners had not provided any funding to the council over the past three years. The ACHRC's relationship to the County is now ambiguous. Stakeholder interviews and secondary research revealed that the reasons for the split were largely political, despite the ACHRC being a non-partisan organization. The Commissioners explicitly and repeated rejected applicants to the ACHRC because of perceived liberal political stances on unrelated issues, while appointing members with conservative political views in order to politicize the ACHRC. Alamance County Commissioner David Smith was quoted in a local newspaper article about the subject saying "My feeling on this board on any appointment is that it should mirror our political beliefs".[1]

This split is problematic for several reasons. Firstly, the ACHRC must remain a non-political organization in order to effectively promote cultural diversity and affirmatively further fair housing regardless of the opinions or beliefs of the appointing elected officials. Secondly, the ACHRC's split from the county removes them from the public funding source, thus jeopardizing their existence. It also reduces their capacity to affirmatively further fair housing, conduct public outreach, and remain involved with the communities they serve.

In addition to the lack of capacity in the Human Rights Commission, Burlington's City Council was also identified as problematic in catalyzing fair housing efforts by local stakeholders. Stakeholder interviews in Burlington repeatedly cited Burlington City Council's lack of understanding of fair housing as a barrier to fair housing policy. Because all council members are at-large rather than district-based, this leaves no councilperson representing Burlington's lower-income and high-minority areas, which tend to be more politically marginalized and more likely to face discrimination than the general population.

1 The Times News. "Commissioners Reject Another Human Relations Council Nominee". June 17, 2013.

Testing

Testing for discrimination in the housing market has never occurred in Burlington. The City of Burlington has done surveys with a Hispanic service provider that touched upon fair housing, but it did not receive a high level of response.

Summary of Housing Discrimination Complaints

Since January 1, 2012, there has been one fair housing complaint filed in Alamance County. This complaint was filed in 2013 on the basis of gender. There is currently an open investigation.

Progress since Previous AI

Burlington's last AI was completed by TDA, Inc. in 2010. It identified two impediments in Burlington:

- The lack of access to both affordable homeowner and renter units, and preventing predatory lending practices
- The need to accelerate fair housing outreach to the private sector housing industry.

While these are more general recommendations rather than prescriptive solutions, annual progress towards these goals can be tracked using the City's CAPERs. Since the development of this AI, Burlington has created and maintained partnerships with realtors, public and private housing providers, and housing counselors. The City refers potential first-time homebuyers to certified housing counselors at Alamance County Community Services Agency, local mortgage lenders, or the Consumer Credit Counseling Services of Burlington. They have also conducted accelerated fair housing outreach with housing developers, realtors, local financial institutions, and insurance professionals.

Burlington has also committed $100,000 out of its revolving loan fund for housing rehab for low-income and moderate-income residents. It also met or exceeded the expected numbers of housing units rehabilitated and brought out of substandard conditions. The City completed 33 out of an expected 30 projects, exceeding its multi-year goal. However, the City was not able to utilize its HOME funds to help low-income or moderate-income first-time homebuyers in 2013 or 2014.

The fair housing section of the City of Burlington's website is regularly updated, and contains Spanish translations of fair housing information as part of its effort to reach out to the growing Hispanic community. Information on predatory lending is also available. In order to stretch the relatively small CDBG budget, the City of Burlington plans to leverage private and other public funds to fill gaps to finance projects and, and to assist and coordinate efforts with agencies and non-profits to develop, finance and provide programs, services and housing for low and moderate-income people, the homeless and special needs populations.

High Point

Human Rights Ordinance

In 2007, High Point adopted its Fair Housing Ordinance to secure for all persons in the City freedom of discrimination because of race, color, religion, national origin, sex, handicap, or familial status in real estate transactions. The ordinance describes discrimination in real estate transactions, discrimination based on disability, discrimination in residential real estate related transactions, and discrimination in the provision of brokerage services.

Under the authority of the ordinance, the High Point Human Relations Commission (HPHRC), which is supported by the Human Relations Department, can receive, investigate, and conciliate complaints of discrimination in housing. In its role as a local fair housing enforcement agency, the Department emphasizes education as the first and best measure to prevent discrimination in housing practices and transactions.

In addition, the Ordinance gives the HPHRC the following powers:

- Receive, initiate, investigate, seek to conciliate and conduct hearings on complaints filed
- Make recommendations to parties named in such complaints
- Approve or disapprove plans to eliminate or reduce the effects of discriminatory practices and monitor compliance with such plans
- Adopt, promulgate, amend, and rescind rules and regulations to effectuate the purposes and policies associated with the Fair Housing Ordinance and to carry out the purposes of the Ordinance

In addition, the ordinance outlines the procedures for conciliation, including the following steps in the process: filing a written complaint with the Commission, the Commission's actual investigation of a complaint, the establishment of conciliation agreements, the Commission's conduction of hearings, and the establishment of findings following a hearing.

The City Human Relations Department has been working to achieve substantial equivalency between the City's fair housing ordinance and the Federal Fair Housing Act. In November 2009, HUD notified the City of revisions which would be necessary for the municipal ordinance to be deemed substantially equivalent to federal law. To date, this milestone has not been achieved.

Human Relations Commission

The High Point Human Relations Commission (HPHRC) is comprised of 13 public citizens and 3 City liaisons. This group reviews and gives recommendations on issues of human and civil rights and relations, organizes special events, and builds public awareness. The Commission provides three principal services to facilitate human rights: Fair Housing and Equal Employment Advancement, Civic Engagement Programming, and Multiculturalism and Diversity Training. In addition, the HPHRC partners with agencies on initiatives that address human rights issues, sponsors a student human relations commission, holds forums, convenes special interest meetings, provides special programming, and conducts community outreach. The Commission has three full-time staff members and the full membership meets monthly.

In addition to investigating complaints, the Commission also focuses on education and outreach efforts in the community and coordinates on a regular basis with other agencies and organizations who are involved in fair housing issues. For example, the HPHRC has conducted training sessions for staff of both Guilford County and the High Point Housing Authority. In addition, the Commission has held two training sessions for the local Board of Realtors. The HPHRC also offers a Community Resource Guide for distribution to the public.

High Point residents can access fair housing services from a variety of organizations, including but not limited to the North Carolina Human Relations Commission and the High Point Human Relations Commission. Each of these groups intakes fair housing complaints and in some cases investigates those complaints through testing. While some organizations offer only referral and education programs to the community, others concentrate their efforts in tenant and landlord issues.

The City's HRC attempts to resolve fair housing complaints. When a complaint is received, Commission staff members validate the information in the complaint, affirm facts, and determine whether fair housing laws have been violated. Once this initial analysis is completed, the Commission sends a certified letter to the respondent of the alleged complaint. The Commission strives to achieve a settlement that meets the interests of both parties and works primarily on mediation and conciliation.

Testing

The High Point Human Relations Commission receives fair housing complaints, and in some cases investigates those complaints through testing. Despite being recommended in the City's 2011 Analysis of Impediments, testing for discriminatory practices within the rental housing market has not occurred.

The City should initiate paired testing and publicize the testing results in order to demonstrate the City's commitment to fair housing and to educate both the public and landlords on fair housing law and its impact on local residents. Because housing discrimination complaints in High Point were most commonly regarding race and disability, these factors should be the focus of the paired testing.

Summary of Housing Discrimination Complaints

Because HUD's housing complaint data is aggregated at the County level, data for the City of High Point alone is unavailable. In Guilford County, there have been nine fair housing complaints filed since January 1, 2012.[1] More detailed data is available for eight of the complaints. Of these eight, six were filed on the basis of disability, one was filed on the basis of race, and one was filed on the basis of both familial status and national origin. Four of these complaints are still under open investigation, one complaint underwent successful conciliation, one complaint was withdrawn after successful resolution, one was closed after a no cause determination, and one was closed because the client failed to cooperate.

The City of High Point recently had a housing discrimination complaint filed against the city resolved by the North Carolina Human Relations Commission. Filed by a resident of a city-owned Shelter-Plus Care Program participant on the basis of disability, the NCHRC "determined there were no reasonable grounds to believe that an unlawful discriminatory housing practice...occurred" and dismissed the complaint against the city on May 23, 2014.

1 These may include housing complaints filed in cities other than High Point, but there is insufficient information from HUD to determine this.

Progress since Previous AI

The most recent AI for the City of High Point was conducted in 2011 by Mullin & Lonergan Associates, Inc. The document reported impediments based on a review of City fair housing and zoning regulations as well as demographic analysis, housing policy, HMDA data, and in-depth stakeholder interviews.

The HPHRC has made a considerable effort to increase its presence on the Internet through a redesign of its website. The website also includes new material on fair housing, a landlord/tenant handbook, promotion of upcoming fair housing events, and online access to previously unavailable presentations and videos that educate the public about fair housing issues.

One of the more specific recommendations in the 2011 AI was to deconcentrate the supply of affordable housing available in High Point. In response to this, the City supported the development of two large projects located outside the LMI concentration areas. These projects were Admiral Pointe, a 54-unit complex targeting LMI seniors, and Addington Ridge, a 58-unit LIHTC complex. The sources of funding for these projects were the HOME program and HUD Section 108, respectively.

The demand for affordable and accessible housing units within the City of High Point amongst persons with disabilities was found to exceed supply. Park Terrace, a 172-unit LIHTC project, the third major housing development in High Point since the 2011 AI, seeks to address this impediment. While it is not located in a high-opportunity area, it does significantly address the demand for ADA-compliant affordable rental housing units.

In order to address the disproportionately high level of difficulty minority households face when becoming homeowners, the City has created an enhanced lease-purchase program. The program began in 2011 utilizing $178,500 of CDBG and HOME funds. The buyer must select a house available through the lease-purchase program of the City, but can also select through participating CHDOs. The buyer enters a 1-year lease during which time they receive comprehensive financial literacy, money management, and savings training. This increases the ability of low-income minority households to become homeowners.

Down payment and closing cost assistance is also now available to income-qualified first-time homebuyers to reduce out-of-pocket costs in the form of a deferred low-interest loan rate. Assistance is available up to $5,000 in most areas of the City. In high-LMI areas such as Macedonia, West End, and Southside, up to $7,500 is offered. The City should, however, offer the higher amount of assistance in higher-cost neighborhoods in an effort to expand affordable housing chose in higher-opportunity areas.

Homebuyer education classes were also implemented since the last AI, targeted towards benefitting minority LMI households. This class was paired with an individual development account (IDA) program. The homebuyer education class provides basic knowledge about buying a home, and creates synergy with existing programs by educating students about the City's down-payment assistance program in the process. The individual development account program is a more comprehensive 10-month program designed to prepare selected applicants for mortgage qualification and lease purchasing. The class ties in partnerships with the local banking and real estate community. This addresses both financial literacy and partnership building with local lending institutions—two impediments identified in the last AI. In 2013 the program successfully trained 97 students, 90% of which were minorities.

The High Point Language Access Plan, effective January 1, 2014, requires translation of vital documents such as compulsory forms into Spanish. While these may be available in hard copy at service providers, they are not yet available online. Interpretive services are now available on an as-needed basis free of charge, and the City is working extensively with World Relief and Lutheran Refugee Services to identify other language groups in the City that require specialized outreach. This directly addresses three impediments to fair housing found during the last AI.

The following recommendations included in the 2011 AI have yet to be addressed:

- Adopted of an inclusionary zoning policy
- Elimination of minimum distancing requirements for group home and family care facilities. While this requirement is in compliance with State law, it is inconsistent with the Federal Fair Housing Act.
- Resolution of service gaps in the public transit system
- Development of a system for ensuring participation of the protected classes on appointed city boards and commissions
- Institution of a programmatic requirement that 10% of all newly constructed multi-family units be accessible to persons with disabilities or include visitability design standards

Surry HOME Consortium

Human Rights Ordinance

None of the four counties in the Surry HOME Consortium has a human rights or fair housing ordinance.

Human Rights Commission

None of the four counties in the Surry HOME Consortium has Human Rights Commissions.

Testing

No testing for discrimination has been completed recently in any areas of the Surry HOME Consortium.

Summary of Housing Discrimination Complaints

In the Surry HOME Consortium, there have been three fair housing complaints since January 1, 2012. Two of these complaints were in Surry County. One was filed on the basis of disability and the other was on the basis of race. The disability-related complaint was closed after successful conciliation and the race-related complaint was closed after a no-cause determination. One complaint was filed in Stokes County on the basis of both race and disability. This complaint was closed after a no-cause determination.

Progress since Previous AI

The Surry HOME Consortium's last AI was completed in March of 2011. This document identified two key impediments to fair housing and two additional impediments to affordable housing in the area.

Impediments to affordable housing were the lack of water and sewer infrastructure and the lack of a regional transportation system. The YVEDDI transportation system continues to improve connectivity in the region, but financing is limited. Water and sewer remain a challenge due to the rural nature of the area.

A lack of communication and education about fair housing practices, particularly regarding language barriers, were the two impediments to fair housing identified. Information about fair housing practices has been made increasingly available, and outreach to persons with LEP has been prioritized by utilizing existing businesses and faith-based organizations that work regularly with these populations.

POLICY IMPLICATIONS SUMMARY

In reviewing the policies and programs from each of the four entitlements, there were a number of issues worth addressing, all of which could be divided into two categories: (1) recommendations for programmatic changes to enhance service delivery and affirmatively further fair housing or (2) impediments to fair housing choice (i.e., discriminatory provisions in policies or programs). Recommendations for changes to a current policy or program do not rise to the level of an impediment, or obstacle, to fair housing choice. The recommended changes would, if implemented, enhance the program's benefits and expand fair housing choice. On the other hand, impediments to fair housing choice are more serious in nature as they have the effect of restricting housing choice for members of the protected classes in violation of the Fair Housing Act. Public and private sector policies and programs with discriminatory provisions, whether intentional or not, must be corrected in order for fair housing choice to be available to all residents. The following is a summary of the programmatic improvements needed and discriminatory policies identified in each of the four entitlements.

Burlington

Program improvements needed:

- Incorporate required compliance with the federal Fair Housing Act in all HUD program sub-recipient agreements
- Adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing
- The HOME Program must include and implement the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods

Impediments to fair housing choice:

- The zoning ordinance limits the number of unrelated people who may live together to two and restricts mobile homes to a dedicated district.
- The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- The absence of a Language Access Plan detailing the city's protocol for ensuring access to city services and programs to potential beneficiaries with limited English proficiency (LEP)
- The absence of a public transportation system connecting Near-RCAP and other low- and moderate-income neighborhoods with employment opportunities and other community assets
- The absence of a lawfully organized and politically-neutral human rights commission to provide fair housing education, outreach and enforcement of fair housing laws at the local level
- The concentration of poverty in East and North Burlington, along with growing minority populations, calls for intervention to avoid those neighborhoods becoming RCAPs
- The concentration of assisted housing in Near-RCAP and other low- and moderate-income census tracts

Greensboro

Program improvements needed:

- Adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing

Impediments to fair housing choice:

- The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
- The zoning ordinance requires an overlay zone location or special use permit for manufactured homes
- The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute
- The zoning ordinance restricts homeless shelters to non-residential districts

- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- Discrimination in the rental market on the basis of race and ethnicity as demonstrated by paired testing
- Nineteen of the City's 173 block groups (10.9%) were identified as RCAP areas
- The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
- Paired testing revealed housing discrimination based on race

High Point

Program improvements needed:

- Incorporate required compliance with the federal Fair Housing Act in all HUD program sub-recipient agreements
- Adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing
- The HOME Program must include and implement the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods

Impediments to fair housing choice:

- The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
- The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute
- The zoning ordinance restricts homeless shelters to non-residential districts
- The zoning ordinance requires an overlay district or special permit for manufactured housing
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- Sixteen out of the City's 67 block groups (23.8%) were identified as RCAP areas
- The concentration of assisted housing in RCAP and other low- and moderate-income census tracts
- A lack of paired testing in the housing market

Surry HOME Consortium

Program improvements needed:

- Adopt a policy to refrain from providing federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing
- The HOME Program must include and implement the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods

Impediments to fair housing choice:

- Potential problems identified among the local zoning ordinances include restrictive siting for mobile/manufactured homes. Details are in Appendix C.
- The absence of a public policy that results in the creation of affordable housing in higher opportunity areas
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities
- A lack of paired testing in the housing market

In addition to the public sector, there are impediments within private sector policies that restrict fair housing choice. These are listed below:

Impediments to fair housing choice:

- Multi-racial and Black applicants for mortgage loans were more likely to be denied than White applicants

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IDENTIFICATION OF FAIR HOUSING PRIORITIES

This section of the AFH identifies and prioritizes fair housing issues that are consistent with the data analysis conducted through the AFH. Each of the four entitlement communities will incorporate the applicable prioritized fair housing issues, goals and strategies into their respective Five-Year Consolidated Plans and Annual Action Plans. Non-entitled areas that are eligible to apply for funding from the North Carolina Small Cities Community Development Block Grant Program will be responsible for implementing fair housing activities within their jurisdictions. This must be done in order to comply with the State's obligation to affirmatively further fair housing.

FAIR HOUSING PRIORITIES

Despite the different characteristics of each of the four entitlements analyzed in this AFH, the fair housing issues can be categorized into three primary themes: public transportation, affordable and accessible housing, and sustainable employment opportunities.

Specifically, the following three priorities have been identified for the Piedmont Triad Region:

1. A need for expanded public transportation to provide RCAP residents and members of the protected classes with access to higher-opportunity areas and community assets
2. A need for greater affordable and accessible housing opportunities, both rental and sales units, in higher-opportunity areas
3. A need for sustainable employment opportunities within, or in closer proximity to, RCAPs

Based on the data analysis detailed in the AFH, these three priorities have the potential for mitigating each of the determinants of fair housing identified in Section 3. All three priorities will require financial investments, strong political leadership, substantial changes to long-standing public policies, long-term public education, and lengthy implementation periods. However, none of these challenges should be used as reasons to dismiss the possibility of implementation of any one priority and the potential for cataclysmic change at the local and regional levels.

The need for expanded public transportation service was given the highest priority because it can be implemented incrementally and beginning within a potentially shorter time frame. The extension of public transit routes and expansion of service hours will require capital investment over time.

The need for greater affordable and accessible housing opportunities in higher-opportunity areas may require less public financing than expanded public transportation, but it will require a well-designed public education campaign against residential opposition to the development of affordable housing in some areas. This initiative will require time and the investment of significant human resources in the form of political and community leadership to play key roles in any public education campaign.

The need for sustainable employment opportunities in or near RCAPs will require significant capital investment and time, including planning for potential revitalization, redevelopment and re-use of land and structures that are appropriate for new commercial and industrial uses.

GOALS AND STRATEGIES

The goals and strategies established in this section are tailored to each of the four entitlement communities and the Piedmont Triad Region. In this way, each entitlement can incorporate the specific strategies into their respective Five-Year Consolidated Planning process. The fair housing determinants and priorities identified within the AFH should guide the development of the priority housing and community development needs in each entitlement's Consolidated Plan. Annual CDBG, HOME, ESG and HOPWA grant allocations from HUD should then be invested in specific eligible program activities that implement the fair housing strategies included in this AFH.

Goals and strategies have also been developed for the non-entitlement areas in the Piedmont Triad region. This will serve the purpose of assisting local government applicants, who are eligible to apply for funds from the NC Small Cities CDBG Program, to meet their obligation to affirmatively further fair housing.

City of Burlington

Goal 1: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Establish a public transportation system that links low income neighborhoods with higher-opportunity areas, jobs, and other community assets

Goal 2: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Invest the City's HOME funding allocation to provide incentive for the development of affordable rental housing in higher opportunity areas

Strategy 2: Provide market-based density bonuses and other incentives to encourage mixed-income residential developments

Strategy 3: Amend the zoning ordinance to permit single-room occupancy (SRO) or micro-units (less than 400 square feet per dwelling unit) as an affordable housing option for single persons, regardless of income

Strategy 4: Amend the zoning ordinance to include a reasonable accommodation provision for persons with disabilities

Strategy 5: Update the 2000 Comprehensive Plan to incorporate the designation of developable parcels along major corridors and near existing/emerging employment centers as appropriate for multi-family housing

Strategy 6: Partner with Graham Housing Authority to reach out to private landlords in higher opportunity areas to accept Section 8 Housing Choice Vouchers

Goal 3: **Expand access to HUD programs**

Strategy 1: Adopt a Language Access Plan to ensure persons with limited English proficiency (LEP) can access the City's HUD programs and services

Goal 4: **Increase the awareness of fair housing education and outreach among all residents**

Strategy 1: Make available education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and city boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Seek out immigrant populations with limited English proficiency for fair housing education

Strategy 3: Establish a local human rights commission

Strategy 4: Conduct testing in the rental market

Strategy 5: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients which engage in discriminatory housing behavior

Goal 5: **Improve the physical environment in lower income neighborhoods**

Strategy 1: Target dwelling units cited for code violations for inclusion in the City's housing rehabilitation program

Strategy 2: Continue the City's housing rehabilitation program to maintain and preserve the affordable housing stock in near-RCAP and older neighborhoods

Strategy 3: Develop an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing that is within walking distance from downtown

Strategy 4: Provide for homeowner / homebuyer / financial counseling for lower income households, minority households and households with limited English proficiency (LEP) for the purpose of educating owners and buyers on predatory lending, high-cost lending and financial management

Strategy 5: Allocate CDBG assistance to improve public facilities and infrastructure to complete the redevelopment plans in near-RCAP areas

City of Greensboro

Goal 1: **Improve the physical environment in racially concentrated areas of poverty**

Strategy 1: Continue existing rehabilitation programs to preserve and maintain the City's affordable housing inventory

Strategy 2: Establish an emergency rental housing rehabilitation program with forgivable loans if owners agree not to increase rent after five years

Strategy 3: Establish a formal land banking program as a means of assembling and redeveloping parcels for residential and non-residential areas where existing infrastructure is available

Strategy 4: Continue to target dwelling units cited for code violations for inclusion in the City's housing rehabilitation program

Strategy 5: Continue the City's owner-occupied housing rehabilitation program to maintain and preserve the affordable housing stock in older neighborhoods. Tie this into an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing that is within walking distance from downtown

Strategy 6: Continue to provide homeowner/ homebuyer/financial counseling targeted to lower income households, minority households and households with limited English proficiency (LEP). Educate owners and buyers on predatory lending, high-cost lending and financial management

Strategy 7: Direct CDBG funding support to public improvements in RCAP and Near-RCAP areas

Goal 2: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Support planned investments to transition the hub-and-spoke transit system to more efficient and convenient public transportation routes

Goal 3: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Incentivize development of affordable rental housing in higher opportunity areas

Strategy 2: Modify the City's homebuyer assistance program to increase the individual down payment amount available to eligible purchasers in higher opportunity / higher cost neighborhoods

Strategy 3: Partner with development entities to strategically select parcels for affordable rental housing development in higher opportunity areas

Strategy 4: Incorporate the designation of developable parcels along major corridors and near existing/emerging employment centers as appropriate for multi-family housing in the update of the comprehensive plan. Provide policy guidance on appropriate locations for multi-family housing

Strategy 5: Consider policies that encourage a wide range of affordable housing opportunities, such as micro-units or pocket neighborhoods as affordable housing options for single persons, regardless of income

Strategy 6: Amend the zoning ordinance to include a reasonable accommodation policy for persons with disabilities

Strategy 7: Amend the zoning ordinance to permit manufactured housing as single-family dwelling units

Strategy 8: Continue to encourage mixed residential developments. Consider density bonuses to incentivize mixed residential development

Strategy 9: Greensboro Housing Authority should continue its initiative of paying a higher payment standard for Section 8 voucher holders who are able to secure housing in higher-cost neighborhoods

Strategy 10: Examine and find ways to reduce barriers to accessory unit development

Goal 4: **Increase the awareness of fair housing issues**

Strategy 1: Continue to provide education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and city boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Continue to seek out immigrant populations with limited English proficiency for fair housing education

Strategy 3: Apply for funding to conduct paired testing in the local rental housing market. Examine the feasibility of paired testing in the homebuying market as well

Strategy 4: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients that engage in discriminatory housing behavior

City of High Point

Goal 1: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Examine revising the City's hub-and-spoke transportation routes to more readily connect areas in the South with employment centers on the North

Strategy 2: Prioritize the creation of a Citywide sidewalk network within the capital improvement plan in order to increase multi-modal transit access

Strategy 3: Expand public transportation routes to serve new multi-family development

Goal 2: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Invest and prioritize the City's HOME, CDBG and other grant funding as appropriate to provide incentives for the development of affordable family rental housing in higher opportunity areas

Strategy 2: Modify the City's homebuyer assistance program to increase the individual down payment amount available to eligible purchasers in higher opportunity / higher cost neighborhoods

Strategy 3: Incorporate the Site and Neighborhood Standards criteria of the HOME program into the local site selection process

Strategy 4: Partner with High Point Housing Authority to strategically select parcels for affordable family rental housing development in higher opportunity areas

Strategy 5: Complete the Development Ordinance Update and incorporate innovative provisions such as accessory dwelling units by-right, single-room occupancy (SRO) units and micro-units (less than 400 square feet per dwelling unit) regardless of income

Strategy 6: Provide market-based density bonuses and other incentives to encourage mixed-income residential developments

Strategy 7: Explore the possibility of establishing a local trust fund to directly address the City's affordable housing needs

Strategy 8: Amend the zoning ordinance to include a reasonable accommodation policy for persons with disabilities

Goal 3: **Increase the awareness of fair housing education and outreach**

Strategy 1: Continue the City's initiatives to provide education and outreach training through a certified HUD fair housing agency to four groups: CDBG staff and boards and commissions, city department heads and elected officials, private landlords, and the general public

Strategy 2: Seek out immigrant populations with limited English proficiency for fair housing education

Strategy 3: Adopt a formal policy to refrain from allocating CDBG funds to subrecipients that engage in discriminatory housing behavior

Strategy 4: Conduct paired testing in the rental housing market

Goal 4: **Improve the physical environment in RCAPS**

Strategy 1: Continue the City's Lead Safe High Point Program to remediate lead hazards from affordable housing occupied by lower income families with children

Strategy 2: Continue the City's Community Based Initiatives Program to improve the quality of life for persons and households in lower income neighborhoods

Strategy 3: Continue to support the neighborhood organizations that work to revitalize lower income neighborhoods and empower residents

Strategy 4: Study the feasibility of establishing a land bank in the City as

a means of redeveloping parcels for residential and non-residential land use where existing infrastructure is available

Strategy 5: Expand the City's owner-occupied housing rehabilitation program to extend beyond primarily weatherization and code enforcement violations to approach home repair more comprehensively

Strategy 6: Develop an urban re-settlement initiative for younger age cohorts (25-34 years old) with homebuyer incentives in older neighborhoods with lower-cost housing

Strategy 7: Continue the City's Homeownership Education Classes for homeowner / homebuyer / financial counseling for lower income households, minority households and households with limited English proficiency (LEP) for the purpose of educating owners and buyers on predatory lending, high-cost lending and financial management

Strategy 8: Allocate CDBG assistance for public facilities and infrastructure in RCAP and near-RCAP areas

Surry HOME Consortium

Goal 1: **Decrease the disparity in access to higher opportunity areas for lower income households, especially members of the protected classes**

Strategy 1: Continue YVEDDI's and PART's rural transportation system, and coordinate with PTRC's rural planning organization on ways to improve service for lower income households to jobs, services, community colleges, and schools in higher opportunity areas

Strategy 2: With PTRC assistance, analyze non-entitlement local government zoning ordinances for consistency with benchmark practices, the goals of this AFH, Piedmont Together, and other relevant documents

Strategy 3: Continue the Section 8 Housing Choice Voucher program throughout the Consortium. Encourage managers of apartments and rental homes in higher opportunity areas to accept vouchers

Goal 2: **Expand affordable housing opportunities in higher opportunity areas**

Strategy 1: Invest the Consortium's HOME funding allocation to provide incentive for the development of affordable rental housing in higher opportunity areas

Strategy 2: Incorporate the Site and Neighborhood Standards criteria of the HOME program into the local site selection process throughout the Consortium

Strategy 3: Increase the Section 8 Housing Choice Voucher payment standard for rental units in higher-cost areas to expand housing choice

Strategy 4: Focus partnerships with affordable housing providers on expanding opportunities for new residential developments with priority for higher opportunity areas served by PART or YVEDDI systems

Goal 3: **Work with PTRC, HUD, the NC Fair Housing Center, or some other non-profit organization to Increase the awareness of fair housing education and outreach**

Strategy 1: Provide education and outreach training through a certified HUD fair housing agency to four groups: HOME staff and county boards and commissions, county department heads and elected officials, private landlords, and the general public

Strategy 2: Adopt a formal policy to refrain from allocating HOME funds to subrecipients that engage in discriminatory housing behavior

Strategy 3: Apply for funding to conduct paired testing in the local rental housing market

Goal 4: **Improve the physical environment in lower opportunity areas**

Strategy 1: Continue YVEDDI's and PTRC's weatherization programs to maintain and preserve the affordable housing stock

Strategy 2: Continue the Consortium's HOME-funded housing rehabilitation activities to preserve the affordable inventory for lower income households

Strategy 3: Help local governments in the Consortium area identify neighborhoods in lower-opportunity areas with high levels of distressed housing and poverty, and pursue resources to address conditions

Goal 5: **Improve the quality of life for Consortium residents**

Strategy 1: Continue YVEDDI's community services and programs

Piedmont Triad Regional Council

Goal 1: **Facilitate compliance among the non-entitled communities with the obligation to affirmatively further fair housing through the North Carolina Small Cities CDBG Program through PTRC (See Appendix E)**

Strategy 1: Incorporate a series of fair housing strategies as a required element for participation in the Small Cities CDBG Program (see Appendix E)

Strategy 2: Adopt a policy to refrain from approving / supporting applications to the NC State Small Cities CDBG Program from local units of government with zoning ordinances containing discriminatory language

Goal 2: **Expand fair housing choice for members of the protected classes**

Strategy 1: Develop model infill development provisions and incentives for use in older areas where redevelopment is a viable option for residential and non-residential uses and where existing infrastructure is available

Strategy 2: Develop model zoning language for accessory dwelling units (i.e. garage apartments, mother-in-law suites, elderly cottage housing opportunities, etc.) in residential zoning districts as a means of engaging the private market in providing smaller, more affordable housing options

Strategy 3: Develop a comprehensive and practical Affirmative Marketing Plan, and work with local governments to implement it

Strategy 4: Continue PART's regional transportation program

Goal 3: **Facilitate the redevelopment of vacant properties**

Strategy 1: Develop model land banking legislation in accordance with State law for local jurisdictions

Strategy 2: Explore utilizing PTRC's Regional Brownfields Development Program to evaluate vacant properties for catalytic redevelopment feasibility

Goal 4: **Facilitate fair housing education and outreach throughout the region**

Strategy 1: Sponsor an annual fair housing summit for developers, builders, nonprofit organizations, architects, engineers, realtors, private landlords, property management agents, elected officials, etc. with workshops on a variety of appropriate topics given by subject matter experts

Strategy 2: Leverage the existing network from PTRC's Weatherization Assistance Program by connecting this program to fair housing education and outreach

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SUMMARY OF COMMUNITY PARTICIPATION

Intensive community outreach and stakeholder interviews were a critical component of learning and contextualizing the fair housing situation within the Piedmont Triad. This section details the community process used to guide the direction of the Regional Assessment of Fair Housing.

SUMMARY OF COMMUNITY PARTICIPATION

The Piedmont Triad Regional Assessment of Fair Housing (AFH) was initiated in January, 2014. Managed by a Steering Committee consisting of a representative from each of the participating entitlements (Burlington, Greensboro, High Point and the Surry HOME Consortium) and the Piedmont Triad Regional Council, a public participation commenced. The plan included the following tasks:

- Identification of and interviews with key community stakeholders
- Conducting a web-based survey with stakeholders to identify fair housing issues throughout the region and potential strategies to overcome them
- Conducting a web-based survey to assess the level of understanding of fair housing laws and issues among elected municipal officials in the three cities and the units of local government included in the Surry HOME Consortium (including entitlement and non-entitlement communities)
- A series of Public Meetings in each of the three cities and within the Surry HOME Consortium to present a summary of major findings based on the Communities of Opportunity analysis
- Notification of availability and solicitation of public comment on the Draft AFH via the websites for each of the three cities, the Surry HOME Consortium, and the Piedmont Triad Regional Council
- A second series of Public Meetings in each of the three cities and within the Surry HOME Consortium to present a summary of the determinants of fair housing along with the priority fair housing issues and recommended strategies
- Review of all comments received on the Draft AFH and incorporation of comments and revisions into the document
- Presentation of the Final AFH to each of the three city councils and the Surry HOME Consortium Board

Each of these tasks are summarized as follows.

Community Stakeholder Interviews

At the outset of the AFH planning process, the cities and Consortium refined a list of key community stakeholders whose input would be sought during the preparation of the plan. Stakeholders involved in housing in one facet or another such as development, management, fair housing advocacy, disability advocacy, etc., were invited to a series of interviews in each city and the Consortium. A list of the stakeholders invited to participate is included at the end of this section.

Interviews were conducted in High Point on February 4-6. A second round of interviews was conducted in all three cities and in the Surry HOME Consortium area on March 3-5. Information obtained through the interviews was incorporated throughout the AFH and assisted in identifying the determinants of fair housing.

Web-based Stakeholder Survey

During the month of April, a web-based survey was launched to reach out to stakeholders who might not otherwise be able to participate in the AFH process. Despite a very low response rate (17 total), an analysis of the responses was conducted and is summarized below.

Characteristics of Respondents

- 76% of the respondents worked in Guilford County
- 76% were White, 18% were Black; all respondents were non-Hispanic
- 82% of the respondents had a Bachelor's degree or higher
- 65% worked in a public agency, 17% were employed by nonprofit housing organizations
- 53% have been in their current position five years or longer

Barriers to Housing

- Among the barriers faced in the housing market, the following responses were identified:
  - Can't find an affordable unit to rent (80%)
  - Substandard housing (80%)
  - Can't qualify for a mortgage due to poor credit history (53%)
  - Can't qualify for a mortgage due to insufficient income (53%)
  - Can't qualify for a rental unit due to a criminal background (47%)
  - Can't qualify for a mortgage due to insufficient down payment funds (47%)
  - Can't find an affordable housing unit to buy (40%)
  - Can't qualify for a rental unit due to poor or no credit history (40%)

Housing Discrimination

- 63% of respondents reported they had encountered someone in their line of work who revealed they had been discriminated against in their housing search; of these:
  - 23% told the person to file a complaint with a government agency
  - 13% initiated legal action against persons or organizations accused of housing discrimination

Fair Housing Education

- 68% of respondents reported they distributed flyers to educate the public on fair housing; the same percentage reported they trained their own staff to recognize housing discrimination and inform clients of the resources available to assist them; 50% reported sponsoring a workshop or seminar

Impediments to Fair Housing

Among the impediments listed by respondents, the following were noted:

- Slumlords (who) own most affordable housing
- Race-based discrimination
- Xenophobia
- Lack of affordable, accessible housing in good condition
- Neighborhood opposition to affordable housing
- Lack of available, affordable land to develop new housing
- Background checks
- Public transportation
- Insufficient income
- Substandard housing quality
- Attitude that bad housing is better than no housing so tenants do not complain about conditions

Actions Suggested to Remove Barriers to Fair Housing

Among the actions recommended by respondents are the following:

- More funding for affordable housing
- Education – for tenants, landlords, general public
- Promoting sense of community in diverse neighborhoods
- (Establish) working relationships with lending institutions
- Better public transit to areas with available land that is affordable
- Better paying job opportunities
- Update / modernize (land use, development) ordinances
- Tougher standards for slum landlords, stiffer penalties for substandard housing
- Encourage affordable housing in new developments
- Civil penalties

Web-based Municipal Official Survey

A second survey instrument was developed for distribution to elected officials in all units of local government within the AFH region for the purposes of assessing the level of understanding of fair housing laws and issues, and identifying the type and frequency of fair housing activities being undertaken at the local municipal or county level.

Only one response was received for this survey.

First Series of Public Meetings

The first series of Public Meetings was held on May 19-21 in all three cities and in the Surry HOME Consortium area. The purpose of each meeting was to present a summary of the major findings of the demographic, housing and Communities of Opportunity analyses to stakeholders and the general public. Attendance averaged 12-15 persons at each site. Questions from attendees focused on the opportunity mapping, comparison of the trends among the four communities, and how the analysis would be used to guide the recommendations.

Second Series of Public Meetings

The second series of Public Meetings was held on July 22-24 in the three cities and in the Surry HOME Consortium area. The purpose of these meetings was to present the proposed determinants of fair housing, the priority fair housing issues, and a list of recommended strategies for each of the entitlements and the region as a whole.

(summary of comments received to be added later)

Distribution of the Draft AFH Document for Public Comment

With the completion of the Draft AFH, the document was made available for public display and comment for 30 days beginning in late July. Notice of the availability of the Draft AFH was:

- Emailed to all stakeholders initially identified in the earlier phases of the project
- Emailed to the municipal members of the Piedmont Triad Regional Council
- Posted on the homepages of the three cities and the Piedmont Triad Regional Council

Only one written comment was received.

Presentation of AFH Document to Elected Bodies

(info to be added later)

Figure 65 : Stakeholder Chart

Type of Organization	Contact Name	Title	Name of Organization
CITY BURLINGTON			
CDBG & HOME Programs	Shawna Tillery	CDBG / HOME Director	City of Burlington
Planning / Zoning Dept.	Amy Nelson	Planning Director	City of Burlington
	Joey Lea	Zoning Enforcement Officer	City of Burlington
Public Housing Authority	Ernest Mangum	Executive Director	Burlington Housing Authority
	Tom Lloyd	Section 8 Director	Graham Housing Authority
Affordable Housing Providers, CHDOs	Nikki Ratliff	Director	Burlington Development Corporation
	Wendy Covington	Director	Alamance County Community Services
	Bennie Kidd	Director	Ralph Scott Lifeservices
	Ron Osbourne	Director	Residential Treatment Serivces
	Lynn Rousseau	Director	Family Abuse Services
Advocacy Organizations for Persons with LEP	Jeremy Ireland	Director	Centro La Comunidad
	Anne Cassebaum	Volunteer	Alamance County Human Relations Commission
Local fair housing organizations	William Kruger	Director	Fair Housing Project-Legal Aid NC
Social Service Organizations, Continuum of Care organizations, Housing for Special Needs Populations, etc.	Kim Crawford	Volunteer group	Alamance Co. Interagency on Homeless Assistance
	Susan G. Osborne	Director	Alamance County Social Services
	Spencer Cook	Shelter Plus Care	Cardinal Innovations
CITY OF GREENSBORO			
CDBG & HOME Programs	Gwen Torain	CDBG & HOME Administrator	City of Greensboro
	Caitlin Warren		City of Greensboro
Neighborhood Development Dept.	Barbara Harris	Neighborhood Dev. Director	City of Greensboro
	Cyndi Blue	Affordable Housing Program Manager	City of Greensboro
	Rhonda Enoch	First Time Homebuyer Program Administrator	City of Greensboro
Planning / Zoning Dept.	Sue Schwartz	Planning Director	City of Greensboro
	Hanna Cockburn	Long Range Planning Division Manager	City of Greensboro
	Steve Galanti	Current Planning/Zoning Division Manager	City of Greensboro
	Mike Kirkman	Current Planning/Zoning Division Manager	City of Greensboro
Human Relations Dept.	Love Crossling	Human Relations Director	City of Greensboro
	Lee Stanton	Fair Housing Administrator	City of Greensboro
Public Housing Authority	Tina Akers-Brown	Executive Director	Greensboro Housing Authority
	Erica Moore	VP of Assisted Housing	Greensboro Housing Authority
Affordable Housing Providers, CHDOs	Beth McKee Huger	Executive Director	Greensboro Housing Coalition
	Gene Brown	Executive Director	Community Housing Solutions
	Maria Hanlin	Executive Director	Habitat for Humanity
	Phil Barbee	Director of Construction & Land Development	Habitat for Humanity
	Mike Cooke	President	Partnership Homes, Inc.
	Mac Sims	Executive Director	East Market Street Development Corp
	Shanna Reece	Executive Director	The Servant Center, Inc.
Public transit agency	Libby James	GTA Manager	Greensboro Transit Authority
	George Linney	GTA Paratransit Planner	Greensboro Transit Authority
Fair housing orgs	Love Crossling	Director, HRC	City of Greensboro

Figure 66 : Stakeholder Chart (continued)

Type of Organization	Contact Name	Title	Name of Organization
CITY OF GREENSBORO			
Social Service, Continuum of Care, Housing for Special Needs Populations, etc.	Darryl Kosiak	Director	Partners Ending Homelessness
	Kent Gammon	President & CEO	Central Carolina Health Network
	Kim Poff	Housing Coordinator	Central Carolina Health Network
	Nicole Kiefer	Asst. Director of Housing Resources	ArcNC
Landlord Organizations	David Levy	President	Affordable Housing Management
	George Carr	President	Beacon Management Corp
	Patrick Theismann	Vice President	Beacon Management Corp
CITY OF HIGH POINT			
CDBG & HOME Programs	Mike McNair	CDBG Director	City of High Point
Planning / Zoning Dept.	Heidi Galanti	Planning Administrator	City of High Point
	Bob Robbins	Planning & Zoning	City of High Point
Public Housing Authority	Angela McGill	Chief Executive Officer	High Point Housing Authority
Affordable Housing Orgs	Susan Wood	Director	Habitat for Humanity
Advocacy Organizations for Persons with LEP	Florencia Laureckis	Program Coordinator	Latino Family Center
	Roberta Hawthorne	Director	Reading Connections
	Miguel Carreno	Cultural Diversity Committee	J. Parris-Gray Realty
	Andrew Timbie	Director	World Relief
Public transit agency	Angela Wynes	Transit Director	City of High Point
Local fair housing organization	Al Heggins	Director, HRC	City of High Point
	Tony Lowe		City of High Point
Social Service Organizations, Continuum of Care organizations, Housing for Special Needs Populations, etc.	Steve Key	Director	Open Door Ministries
	Darryl Koziak	Director	Partners Ending Homelessness
	Chris Gillespie	Director	West End Ministries
	Carl Vierling	Director	Community Resource Network
	Justice Carpenter		Salvation Army HP
	Major Jim Rickard	Director	Salvation Army HP
SURRY HOME CONSORTIUM			
CDBG & HOME Programs	Michael Blair	CDBG / HOME Director	PTRC
Planning / Zoning Dept.	Paul Kron	PTRC Planning Director	PTRC
Public Housing Authority	Kay Morgan	Executive Director	Mt. Airy PHA
	Michael Blair	Section 8 Director	PTRC Section 8 (Surry Stokes Yadkin Davie)
Affordable Housing Providers, CHDOs	Roy Helm	President	Wesley CDC
	Wayne Frye	President	Davie Habitat
	Neil Cothren	Director	Mt. Airy Habitat
	Claire Sellars	Director	Upper Yadkin Valley Habitat
	Ron Davis	Director	Stokes Habitat
	Jane Motsinger	Director	SHAHC
Public transit agency	PART	Director	
	YVEDDI	Long-Range Planner	
Social Services orgs.	YVEDDI	Director	

APPENDIX: ADDITIONAL DATA AND ANALYSIS

A

From page 70:

The global Moran's I index is a statistical measure of spatial autocorrelation, meaning in this case the extent to which areas of racial concentration are near other areas of high racial concentration. The index, whose value is between -1 and 1, indicates the degree to which values are geographically clustered together or geographically dispersed. For example, variables such as poverty rates tend to be very tightly clustered together, with areas of high values being located near other high-poverty areas. This is an example of high spatial autocorrelation.

Variables such as gender are almost completely evenly dispersed in the Triad region, with no particular high or low values within the study area. This is an example of low spatial autocorrelation. The Z-scores represent statstical significance: anything with a Z-score of over 2 is statistically significant. This statistic is useful in analysis of socioeconomic distributions because it can assess the intensity and statistical significance of geographic clustering. When used to analyze race data, the Moran's I provides an additional measure of segregation. Non-standardized inverse Euclidean distance was used in the calculation of this index.

Figure 67 : Moran's I Indices and Z-Scores

	Index	Z-Score
Region		
White	0.4472	90.68
Black	0.3125	63.50
Asian	0.2649	54.13
Hispanic	0.1389	28.42
Burlington		
White	0.4557	10.00
Black	0.2676	6.15
Asian	0.1337	3.36
Hispanic	0.3753	8.37
Greensboro		
White	0.2515	28.52
Black	0.2367	26.89
Asian	0.0111	1.89
Hispanic	0.0717	8.48
High Point		
White	0.3995	15.09
Black	0.3648	13.84
Asian	0.1587	6.49
Hispanic	0.1746	7.13
SHC		
White	0.2863	7.69
Black	0.1863	5.60
Asian	0.3038	8.30
Hispanic	0.3228	8.80

Source: HUD, 2010. Calculations by Mullin & Lonergan Associates
Local-level calculations performed using universe of municipal boundaries
All calculations utilize non-standardized inverse Euclidean distance

From page 70 17:

Figure 68 : Racially/Ethnically Concentrated Block Groups

County	Tract	Block Group	Population	Percent Minority	Poverty Rate
Forsyth	200	1	1,103	59.56%	61.85%
Forsyth	500	1	531	98.68%	63.58%
Forsyth	500	3	1,160	98.79%	63.58%
Forsyth	500	2	700	99.43%	63.58%
Forsyth	600	1	1,416	98.16%	51.06%
Forsyth	600	2	640	100.00%	51.06%
Forsyth	700	2	1,014	98.03%	50.77%
Forsyth	700	1	750	98.13%	50.77%
Forsyth	801	1	2,133	99.25%	62.04%
Forsyth	801	2	929	95.05%	62.04%
Forsyth	802	1	442	95.02%	42.74%
Forsyth	802	2	1,658	69.96%	42.74%
Forsyth	1602	2	1,558	98.14%	47.47%
Forsyth	1602	1	1,519	98.62%	47.47%
Forsyth	1901	1	1,549	78.05%	48.74%
Guilford	11000	1	553	99.46%	47.57%
Guilford	11000	3	3,478	98.42%	47.57%
Guilford	11000	2	737	96.74%	47.57%
Guilford	11200	1	2,565	96.70%	51.44%
Guilford	11200	2	907	85.26%	51.44%
Guilford	11200	4	1,039	98.90%	51.44%
Guilford	11200	3	880	97.40%	51.44%
Guilford	11400	5	628	91.68%	63.14%
Guilford	11400	4	602	97.69%	63.14%
Guilford	11400	6	649	92.07%	63.14%
Guilford	11400	1	953	98.73%	63.14%
Guilford	11400	3	1,752	94.75%	63.14%
Guilford	11400	2	707	99.00%	63.14%
Guilford	11500	2	1,239	69.01%	44.57%
Guilford	11500	1	1,016	58.17%	44.57%
Guilford	11500	3	709	69.39%	44.57%
Guilford	11602	2	1,420	74.30%	44.50%
Guilford	11602	1	828	84.78%	44.50%
Guilford	11602	3	733	55.25%	44.50%
Guilford	13800	3	620	81.38%	49.46%
Guilford	13800	4	616	97.90%	49.46%
Guilford	13800	1	959	94.32%	49.46%
Guilford	13800	2	728	88.53%	49.46%
Guilford	13800	5	1,762	96.57%	49.46%
Guilford	13900	2	1,289	96.12%	59.43%
Guilford	13900	4	1,785	83.94%	59.43%
Guilford	13900	3	791	94.40%	59.43%
Guilford	13900	1	644	95.70%	59.43%
Guilford	14000	1	1,093	51.36%	42.19%
Guilford	14000	2	1,986	65.23%	42.19%
Guilford	14300	3	870	77.24%	59.46%
Guilford	14300	4	697	70.44%	59.46%
Guilford	14300	1	723	66.94%	59.46%
Guilford	14300	2	755	92.32%	59.46%
Guilford	14501	2	617	58.51%	48.74%
Davidson	60800	2	769	78.80%	48.38%
Davidson	60800	1	1,849	63.17%	48.38%
Davidson	61400	4	522	79.12%	53.34%
Davidson	61400	3	753	71.58%	53.34%
Davidson	61400	1	936	58.33%	53.34%
Davidson	61400	2	1,187	56.02%	53.34%

From page 70 17:

Figure 69 : Near-RCAP Block Groups

County	Tract	Block Group	Population	Percent Minority	Poverty Rate
Forsyth	301	1	1,799	99.00%	39.93%
Forsyth	302	1	1,859	98.76%	39.37%
Forsyth	400	2	741	98.52%	33.57%
Forsyth	400	1	1,189	98.40%	33.57%
Forsyth	400	3	1,321	98.33%	33.57%
Forsyth	1000	1	709	44.43%	31.91%
Forsyth	1000	2	2,280	74.43%	31.91%
Forsyth	1700	5	1,675	73.49%	39.67%
Forsyth	1700	2	498	99.80%	39.67%
Forsyth	1700	4	809	96.91%	39.67%
Forsyth	1700	3	1,425	97.89%	39.67%
Forsyth	1700	1	824	94.78%	39.67%
Forsyth	1800	1	1,505	84.39%	34.29%
Forsyth	1800	3	759	92.49%	34.29%
Forsyth	1800	4	972	97.74%	34.29%
Forsyth	1800	2	971	87.02%	34.29%
Forsyth	2703	1	1,844	78.90%	32.63%
Forsyth	2703	3	1,480	58.31%	32.63%
Forsyth	2703	4	947	62.94%	32.63%
Forsyth	3403	2	1,304	90.57%	33.76%
Forsyth	3403	1	2,108	72.72%	33.76%
Forsyth	3404	2	2,340	82.48%	36.23%
Forsyth	3404	1	1,577	76.98%	36.23%
Guilford	10602	3	1,348	43.69%	41.01%
Guilford	10900	1	1,028	69.55%	37.92%
Guilford	12608	1	2,392	85.66%	32.73%
Guilford	12611	1	2,221	80.01%	36.77%
Guilford	12611	2	1,356	85.18%	36.77%
Guilford	12705	2	2,030	98.77%	32.06%
Guilford	12705	1	2,026	96.50%	32.06%
Guilford	12707	1	1,042	90.12%	37.87%
Guilford	12707	2	1,547	90.82%	37.87%
Guilford	14501	1	683	45.39%	48.74%
Alamance	20400	4	796	92.59%	30.41%
Alamance	20400	5	1,022	96.18%	30.41%
Alamance	20400	3	729	93.28%	30.41%
Alamance	20400	2	1,501	81.88%	30.41%
Alamance	20400	1	2,011	64.59%	30.41%
Alamance	20502	2	852	65.85%	36.72%
Alamance	20502	3	649	70.26%	36.72%
Alamance	20502	1	2,281	64.97%	36.72%
Randolph	30301	2	2,717	41.04%	38.78%
Randolph	30301	1	3,059	51.98%	38.78%
Randolph	30302	1	969	51.60%	39.07%
Randolph	30302	2	2,072	72.92%	39.07%
Davidson	60700	1	1,744	56.94%	31.40%
Davidson	60700	2	936	71.37%	31.40%
Davidson	60700	4	1,290	60.23%	31.40%
Davidson	60800	3	1,920	44.32%	48.38%
Davidson	61000	3	1,441	47.74%	31.25%
Davidson	61600	2	1,265	43.79%	33.70%
Davidson	61600	1	734	57.22%	33.70%
Caswell	930100	2	893	56.10%	39.10%
Caswell	930100	1	1,543	56.38%	39.10%
Caswell	930200	1	694	58.93%	33.96%
Caswell	930200	4	1,823	64.67%	33.96%
Caswell	930200	2	2,010	46.82%	33.96%
Caswell	930200	3	1,311	45.46%	33.96%
Montgomery	960402	2	1,137	43.89%	38.08%
Montgomery	960500	1	1,112	58.54%	31.78%
Montgomery	960500	3	1,355	75.72%	31.78%
Montgomery	960500	2	1,732	64.55%	31.78%

From page 70 22:

Figure 70 : Comparison of Native and Foreign-Born Populations, 2012

	Burlington		Greensboro		High Point	
	Native	Foreign born	Native	Foreign born	Native	Foreign born
Total population	110,226	10,531	280,575	31,211	149,775	16,494
Average household size	2.31	3.34	2.3	3.26	2.4	3.66
Average family size	2.89	3.57	2.99	3.74	2.99	3.88
Race and Ethnicity						
White	68.20%	27.10%	55.20%	36.60%	67.20%	32.30%
Black or African American	22.90%	1.20%	39.40%	18.70%	27.60%	9.60%
Asian	0.40%	13.50%	1.20%	28.00%	1.80%	32.30%
Some other race	5.10%	54.90%	1.40%	14.60%	1.60%	22.90%
Two or more races	2.90%	2.80%	2.20%	1.80%	1.40%	2.50%
Hispanic or Latino origin (of any race*)	7.30%	75.20%	3.80%	37.40%	4.30%	44.90%
Educational Attainment						
Less than high school graduate	12.40%	55.10%	8.80%	33.40%	14.90%	36.30%
High school graduate (includes equivalency)	27.80%	18.50%	24.10%	22.50%	28.90%	20.70%
Some college or associate's degree	33.80%	12.10%	29.50%	17.20%	31.40%	19.80%
Bachelor's degree	18.20%	9.00%	25.40%	17.00%	17.90%	13.80%
Graduate or professional degree	7.60%	5.30%	12.10%	9.90%	6.90%	9.30%
Poverty Status in the Past 12 Months						
Below 100 percent of the poverty level	18.00%	23.60%	16.40%	26.40%	18.90%	27.50%
100 to 199 percent of the poverty level	20.10%	36.50%	19.30%	30.60%	20.70%	27.20%
At or above 200 percent of the poverty level	61.80%	39.90%	64.30%	43.00%	60.40%	45.30%
Median Household income (dollars)	45,124	33,159	45,556	38,136	44,450	40,988
Unemployment Rate	6.40%	6.00%	6.80%	6.70%	7.90%	6.90%
Housing Tenure						
Owner-occupied housing units	62.90%	58.60%	60.00%	44.50%	64.80%	53.10%
Renter-occupied housing units	37.10%	41.40%	40.00%	55.50%	35.20%	46.90%
Housing Problems						
1.01 or more occupants per room	1.20%	18.80%	1.00%	11.70%	1.20%	12.70%
Selected Monthly Owner Costs 30% or more	23.80%	31.20%	27.30%	36.00%	26.30%	46.20%
Gross Rent as a Percentage of Income 30 percent or	48.40%	38.90%	48.50%	39.40%	46.80%	45.20%

Source: American Community Survey, 2010. Data for the Surry HOME Consortium is not available.
*Hispanic ethnicity is calculated independently of race

B

APPENDIX: MATHEMATICAL MODELS

The Assessment of Fair Housing utilized several mathematical models to analyze data. These are described below.

Dissimilarity Index

The dissimilarity index represents the absolute value of the sum of the disproportionate amount of minorities living in a given geographic area in a region. The index is above zero whenever there is a higher or lower percentage of persons of one group in one place. In other words, it represents the percentage of minorities that would have to move in order to achieve perfect integration. Each sub-geography in a given area has its own index value, and the number is summated to produce a result for the overall area. Taking the absolute value means that the lack of presence of a population is weighted the same as overrepresentation of that group.

In the United States, a dissimilarity index of 0 to .30 is considered a low level of segregation. Index values from 0.3 to 0.6 are considered moderate, and values above 0.6 are considered high levels of segregation.

The formula of the dissimilarity index is:

$$D_j^{WB} = \frac{1}{2}\sum_{i=1}^{N}\left|\frac{W_i}{W_j} - \frac{B_i}{B_j}\right|$$

Moran's I Index

The Moran's I index is a measure of spatial autocorrelation, essentially meaning the extent to which high values are located near high values and low values are located near low values. A high Moran's I score means that similar values tend to be more clustered together geographically (similar to a black and white cookie). Conversely, a low Moran's I score means that values are relatively evenly dispersed (similar to a checkerboard). In the context of race, the Moran's I score measures the extent to which areas with high levels of minority concentration are near other areas with high levels of minority concentration. A value of over .4 is considered clustered.

The formula of the global Moran's I Index is:

$$I = \frac{N}{\sum_i \sum_j w_{ij}} \frac{\sum_i \sum_j w_{ij}(X_i - \bar{X})(X_j - \bar{X})}{\sum_i (X_i - \bar{X})^2}$$

Neighborhood School Proficiency Index

The neighborhood school proficiency index uses school-level data on the performance of students on state exams to describe which neighborhoods have high-performing elementary schools and which have lower performing elementary schools. The proficiency index is a function of the percent of elementary school students procient in reading (r) and math (m) on state test scores for the ith school associated with the neighborhood (i =1, 2, ..n) where N is the maximum number of schools in any block-group in the state- distribution, and school enrollment s. This is written mathematically as:

$$School_i = \sum_{i}^{N} \left(\frac{s_i}{\sum^n s_i} \right) * \left[\frac{1}{2} * r_i + \frac{1}{2} * m_i \right]$$

Elementary schools are linked with block-groups based on a geographic mapping of attendance area zones from School Attendance Boundary Information System (SABINS), where available, or within-district proximity matches of up to the three closest schools within a mile. In cases with multiple school matches, an enrollment-weighted score is calculated following the equation above.

Prosperity Index

The prosperity index is a more intuitively named version of the poverty index created by HUD to capture the depth and intensity of poverty in a given neighborhood. The index uses family poverty rate and public assistance receipt3 to operationalize both aspects. The index is a linear combination of two vectors: the family poverty rate (pv) and the percentage of households receiving public assistance (pa). This is written mathematically as:

$$Pov_i = \left[(\frac{pv_i - \mu_{pv}}{\sigma_{pv}}) - 1 \right] + \left[(\frac{pa_i - \mu_{pa}}{\sigma_{pa}}) * -1 \right]$$

Where means (μpv,μpa) and standard errors (σpv,σpa) are estimated over the metropolitan area distribution or balance of state in non-metros.

Job Access Index

The job access index summarizes the accessibility of a given residential neighborhood as a function of its distance to all job locations, with distance to larger employment centers weighted more heavily. Specically, a gravity model is used, where the accessibility (Ai) of a given residential block-group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. The index is written mathematically as:

$$A_i = \sum_{i=1}^{n} \frac{E_j d_{ij}^{-2}}{\sum L_j}$$

Where i indexes residential locations and j indexes job locations, and distance, d, is measured in Euclidean distance between block-groups i and j. E represents the number of jobs in tract j and L is the number of workers.

Labor Market Engagement Index

The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in that neighborhood. Formally, the labor market engagement index is a linear combination of three standardized vectors: unemployment rate (u), labor-force participation rate (l), and percent with bachelor's or higher (b). Mathematically, the index is written as:

$$LBM_i = \left[(\frac{u_i - \mu_u}{\sigma_u}) * |-1 \right] + (\frac{l_i - \mu_l}{\sigma_l}) + (\frac{b_i - \mu_b}{\sigma_b})$$

Where means (μu,μl,μb) and standard errors(σu,σl,σb) are estimated over the metropolitan area distribution or balance of state in non-metros.

Environmental Health Hazards Exposure Index

HUD has constructed a health hazards exposure index to summarize potential exposure to harmful toxins at a neighborhood level.4 Potential health hazards exposure is a linear combination of standardized EPA estimates of air quality carcinogenic(c) , respiratory (r) and neurological (n) with 5 i indexing census tracts. Mathematically, the index is written as:

$$HazExp_i = \left[(\frac{c_i - \mu_c}{\sigma_c}) + (\frac{r_i - \mu_r}{\sigma_r}) + (\frac{n_i - \mu_n}{\sigma_n}) \right] * -1$$

Where means (μc,μr,μn) and standard errors(σc,σr,σn) are estimated over the metropolitan area distribu- tion or balance of state in non-metros.

Transit Access Index

The transit access index was constructed using a synthesis of local datasets. It is a simple scoring rubric based on five evenly weighted distance criteria normalized by 100. In determining distances from bus stop points, the centroids of block groups were used rather than the border. This was due to the high number of bordering block groups in peripheral areas near suburban boundaries.

Factors in the transit access index are:

- Presence of a park and ride ½ mile or closer from the block group = 1 point
- Presence of a bus stop ½ mile or closer from the block group = 1 point
- Presence of a bus stop ¼ mile or closer from the block group = 1 point
- Presence of a PART line ½ mile from the block group = 1 point
- Presence of light rail station ½ mile from the block group = 1 point

Values were then assigned equal weight and normalized to fit on a 0-to-100 scale. Due to the lack of frequency and ridership data, a more nuanced index could not be created for this analysis.

C

APPENDIX: ZONING REVIEW SCORING

The following metric was applied to evaluate zoning ordinances from a fair housing standpoint for each jurisdiction. Results appear on Page 75. Details for each jurisdiction appear on the following appendix pages.

Scoring:
1 – low risk for discrimination
2 – high risk for discrimination

To calculate Zoning Risk Score, divide TOTAL SCORE by 11.

1.00: Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

1.01 – 1.49: Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

1.50 – 2.00: Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Figure 71 : Fair Housing Zoning Ordinance Review Tool

Zoning Ordinance Regulatory Provision			Score
1. Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit *Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit*	Yes (1)	No (2)	
2. Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes (1)	No (2)	
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	Yes (1)	No (2)	
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes (1)	No (2)	
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	Yes (1)	No (2)	
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	Yes (1)	No (2)	
7. Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public funds) and "multi-family housing" (i.e., financed with private funds)	Yes (1)	No (2)	
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing or permanent supportive housing facilities exclusively to non-residential zoning districts	Yes (1)	No (2)	
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes (1)	No (2)	
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	Yes (1)	No (2)	
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or zoning district *Ex: all brick construction, minimum square footage of 2,000, etc.*	Yes (1)	No (2)	
		TOTAL SCORE	

To calculate Zoning Risk Score, divide TOTAL SCORE by 11.

Burlington

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Family is capped at 2 persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes use the term "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed in family care home
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No conditions; allowed by right in all residential districts
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	MF-A and MF-B districts allow multi-unit buildings
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Manufactured homes are not a defined use
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R-9 and R-6 distrcits is less than 1/4 acres
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.18	

Davidson County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is defined as any number of persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes use the term "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed in family care home, up to 12 in a group home
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Siting is restricted to greater than 1/2 mile from another family care home; group homes require a special use permit
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	1	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	No cap defined
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1.5	Some classes of manufactured home are allowed by right; others require a manufactured home park zone or are subject to location conditions in agricultural residential zones
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1.5	Smallest residential lot is 15,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.18	

Davie County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is defined as 1 or more persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes uses the term "supportive family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed in Group Home A, up to 12 in Group Home B
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No conditions
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	2	Multi-family buildings must be approved by the Project Review Committee
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined; group homes allowed by right
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Allowed in three residential districts by right
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R12 and R8 is 8,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Single-family residences are specifically exempted from the requirements of the OD District
TOTAL SCORE	1.18	

Eden

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is defined as 1 or more persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Group homes (or similar) are not defined
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	N/A
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	N/A
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	2	More than 2 units requires a permit
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	2	Not allowed by right or condition in residential districts
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	Requires special use district or conditional use permit
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R6 and R4 is 6,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.36	

Greensboro

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Family is capped at 4 unrelated persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes and group care facilities use the term "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed in single family districts, 9 in multi-family districts for family care home, 30-40 in group care facilities
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Siting is restricted to greater than 1/2 mile from another facility
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	RM-12, RM-18, RM-26, and RM-40 are meant for higher unit buildings
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	2	Homeless shelters are restricted to office, commercial, and industrial zones
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	Manufactured dwellings require an overlay district or special use permit
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R-7 and R-5 is less than 1/4 acres
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.45	

High Point

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is defined as 1 or more persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes and group care facilities use the terms "home" and "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed in family care home, up to 30 in a group care facility
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Siting is restricted to greater than 1/2 mile from another facility
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	RM-12, RM-18, and RM-26 are meant for higher unit buildings
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	2	Homeless shelters are restricted to office, business, and industrial zones
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	Manufactured dwellings require an overlay district or special use permit
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R-9, R-7, and R-5 distrcits is less than 1/4 acres
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.36	

Lexington

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is not defined
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Dependent care home is a single family house
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Dependent care houses have no cap
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No conditions
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Mixed Use District allows apartment buildings by right
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	Require special district; defined as "an affordable means of housing, but do not lend permanency to neighborhoods and therefore are permitted on a limited basis."
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in traditional neighborhood is 6,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	2	Design regulations in all districts
TOTAL SCORE	1.27	

Montgomery County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is not defined
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Group homes (or similar) are not defined
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	N/A
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	N/A
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	No cap defined
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	R-3 district is designed to promote "affordable housing" but does not impose any practical restrictions
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Mobile/modular homes are allowed in all districts
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	2	Minimum lot size is 20,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Exterior standards for conditional use do not apply to residential uses in residential zones
TOTAL SCORE	1.18	

Rockingham County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Family is restricted to related persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes use the term "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed in family care home, up to 12 in a group home
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Siting is restricted to greater than 1/2 mile from another family care home; group homes require a special use permit
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	No cap defined
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	2	Only permitted in OI district with special use permit
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Allowed by right in two residential districts
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1.5	Smallest lot allowed is 15,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	2	Requirements for manufactured homes
TOTAL SCORE	1.50	

Stokes County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is defined as 1 or more persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Group homes (or similar) are not defined
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	N/A
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	N/A
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	No cap defined
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1.5	Manufactured homes are allowed in ag-residential and restricted R-zones
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R8 is 8,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.14	

Surry County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Family is capped at 4 unrelated persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes use the term "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Limits 3 per bedroom, no overall cap
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Only allowed in RA, CB, and HB districts
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Up to 16 units/acre allowed
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Allowed in mobile home parks, general residential, and rural agricultural residential by right
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	2	Smallest lot allowed is 30,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.36	

Yadkin County

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Family is capped at 4 unrelated persons
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care home uses the term "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	Up to 6 are allowed by right in all residential districts
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No conditions
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1.5	Multi-family is allowed in RI, but RI is not a primarily residential district
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined; family care homes allowed by right
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Allowed on individual lots in some R districts
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	2	Smallest lot allowed is 30,000 square feet
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.32	

Yanceyville

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	1	Family is not defined
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Definition of family care homes uses the terms "home" and "family environment"
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	1	No resident cap; allowed by right in residential districts
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No conditions
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not included
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Cap at 8 units/building for townhomes and condominiums
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)	1	No distinction
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Not defined
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Allowed on individual lots in some R districts
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Minimum lot size in R8 is 8,000 sq ft
11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district	1	Not included
TOTAL SCORE	1.09	

D

APPENDIX: PUBLIC HOUSING SURVEY DATA

Information collection for this report included a survey sent to the directors of seven area public housing authorities. Two provided characteristics of their inventory and clients, as presented in this appendix.

Mt. Airy Housing Authority

The Mt. Airy Housing Authority owns and operates 300 units of public housing. This housing authority does not run a voucher program.

Figure 72 : Mt. Airy Housing Authority Units

Development Name	Breakdown of dwelling units				
	0BR	1BR	2BR	3BR	4+BR
Meadowview I & II, Urbana I & II, Marshall Park, Granite Road	7	103	86	84	20

Figure 73 : Mt. Airy Housing Tenants and Applicants

	Current PHA Tenant Households		PHA Waiting List Applicants	
	# of families	% of total families	# of families	% of total families
Total	**290**	**100%**	**141**	**100.00%**
Extremely low income (<=30% AMI)	156	53.8%	101	71.6%
Very low income (>30% but <=50% AMI)	98	33.8%	34	24.1%
Low income (>50% but <=80% AMI)	33	11.4%	6	4.3%
Household Type				
Families with children	141	48.6%	103	73.0%
Elderly families	69	23.8%	11	7.8%
Families with disabilities	100	34.5%	27	19.2%
Race and Ethnicity				
Black	51	17.6%	24	17.0%
White	218	75.2%	110	78.0%
Asian	4	1.3%	0	0.0%
All Other Races	1	0.4%	0	0.0%
Hispanic	16	5.5%	7	5.0%
Characteristics by Bedroom Size				
0 BR	7	2.4%	-	-
1 BR	95	32.7%	68	48.2%
2 BR	85	29.3%	45	31.9%
3 BR	84	29.0%	14	9.9%
4 BR	17	5.9%	9	6.4%
5+ BR	2	0.7%	5	3.6%

Housing Authority of the City of High Point

The Housing Authority of the City of High Point owns and operates 1,132 units of public housing in addition to 101 units of otherwise subsidized housing.

Figure 74 : Housing Authority of High Point Units

Development Name	Breakdown of dwelling units				
	0BR	1BR	2BR	3BR	4+BR
Daniel Brooks		54	100	54	8
Astor Dowdy	42	56	7	1	
Carson Stout				46	70
Beamon Court		28	20	12	
JC Morgan		12	20	44	18
Elm Towers	60	80	10		
Juanita Hills		44	66	12	18
Scattered Sites A			50	29	
Daniel Brooks Annex			28		
Scattered Sites 617-618-620			4	45	
Deep River				31	
Spring Brook Meadows		13	5		
Scattered Sites 622			1	10	
Park Terrace (Phase I)		1	7	7	
Park Terrace (Phase II)		2	6	9	
Scattered Sites Macedonia				2	
Morehead Courts*		90	10	1	
Total	102	380	334	303	114

* This site is non-public affordable housing owned and operated by the authority

Figure 75 : Housing Authority of High Point Tenants and Applicants

	Current PHA Tenant Households		PHA Waiting List Applicants	
	# of families	% of total families	# of families	% of total families
Total	**1,106**	**100%**	**711**	
Extremely low income (<=30% AMI)	787	71.2%	635	89.3%
Very low income (>30% but <=50% AMI)	232	21.0%	61	8.6%
Low income (>50% but <=80% AMI)	87	7.9%	15	2.1%
Household Type				
Families with children / Single	647	58.5%	510 / 93	71.7% / 13.1%
Elderly families	238	21.5%	15	2.1%
Families with disabilities	221	20.0%	93	13.1%
Race and Ethnicity				
Black	841	76.0%	497	69.9%
White	166	15.0%	93	13.1%
Asian	66	6.0%	13	1.8%
All Other Races	33	3.0%	108	15.2%
Characteristics by Bedroom Size				
0 BR	99	9.0%	-	-
1 BR	288	26.0%	210	29.5%
2 BR	321	29.0%	273	38.4%
3 BR	288	26.0%	194	27.3%
4 BR	77	7.0%	27	3.8%
5+ BR	33	3.0%	7	1.0%

Figure 76 : Housing Authority of High Point Voucher Holders and Applicants

	Current Voucher Holders		Voucher Waiting List Applicants	
	# of families	% of total families	# of families	% of total families
Total	**1,353**	**100.0%**	**782**	**100.0%**
Extremely low income (<=30% AMI)	796	58.8%	582	74.4%
Very low income (>30% but <=50% AMI)	361	26.7%	171	21.9%
Low income (>50% but <=80% AMI)	91	6.7%	29	3.7%
Income data unavailable	105	7.8%	-	-
Household Type				
Families with children	743	54.9%	516	66.0%
Single	42	3.1%	95	12.1%
Elderly families	230	17.0%	21	2.7%
Families with disabilities	358	26.5%	150	19.2%
Race and Ethnicity				
Black	1,109	82.0%	665	85.0%
White	216	16.0%	89	11.4%
Asian	14	1.0%	4	0.5%
All Other Races	14	1.0%	24	3.1%
Characteristics by Bedroom Size				
0 BR	0	0.0%	1	0.1%
1 BR	135	10.0%	237	30.3%
2 BR	514	38.0%	324	41.4%
3 BR	636	47.0%	170	21.7%
4 BR	54	4.0%	42	5.4%
5+ BR	14	1.0%	8	1.0%

APPENDIX:

FAIR HOUSING STRATEGIES FOR NON-ENTITLEMENT COMMUNITIES

This appendix includes fair housing strategies for non-HUD-entitlement communities participating in the North Carolina Small Cities CDBG program.

In order to assure that grantees are fulfilling their requirement to affirmatively further fair housing, all units of local government applying for and receiving Community Development Block Grant (CDBG) funds from the State of North Carolina must document how they are meeting their fair housing obligations. A local unit of government can participate in the State's CDBG Program by agreeing to undertake the following mandatory and elective actions appropriate to the conditions and needs in its area. All grantees receiving HUD funds through the State must complete at least three of the mandatory strategies listed below, and at least the one of the elective strategies regardless of whether they are using HUD funds for housing activities.

The implementation of the mandatory strategies must be carried out each year for which the jurisdiction has received HUD funds. This may be achieved through the posting of the information in a conspicuous public place and/or publication in a local newspaper of general circulation. The additional strategies selected by the unit of local government must be carried out during the course of the sub-recipient agreement with PTRC or the State for an eligible activity.

PTRC will verify the local grantees' reports for consistency with the Piedmont Triad Regional Assessment of Fair Housing.

Mandatory Activities to Promote Fair Housing

Sub-recipients must complete at least three of the following activities and implement them during the program year:

- Adopt a fair housing ordinance in which the municipality certifies it will not tolerate housing discrimination or undertake activities that promote segregation residential patterns
- Advertise and publicize that the local unit of government adheres to the requirements of the federal Fair Housing Act (adoption and use of the Equal Housing Opportunity logo and the Equal Housing Opportunity statement)
- Identify and publish the name and contact information of a Discrimination Complaint Officer within the agency or jurisdiction for any housing-related bias or discrimination complaint
- Refer housing discrimination complaints and assist in filing complaints with the U.S. Department of Housing & Urban Development or a local human relations commission
- Advertise the availability of housing and related assistance to population groups that are least likely to apply through various forms of media (i.e. radio stations, posters, flyers, newspapers) and in English and other languages spoken by eligible families within the project service area

Elective Activities to Promote Fair Housing

Sub-recipients must select any one or more of the following activities and implement them during the program year.

- Include a flyer about fair housing in a local utility or tax bill and send it to every household in the municipality
- Tap into the local media:
  - Submit editorials and/or letters to the editor of a local newspaper
  - Add a link on the municipality's website to HUD or the local human rights commission
  - Sponsor advertisements and programs on public access television
- Organize a local letter writing campaign to local legislators and/or local government about the need to fund and support fair housing programs
- Sponsor trainings for realtors, bankers, landlords, homebuyers, tenants, public housing authority and other city/town employees to educate them on their fair housing rights and responsibilities. This activity MUST be done in collaboration with PTRC or a local human relations commission.
- Provide training/educational programs about fair housing for financial, real estate, and property-management professionals at local firms, including their obligations to comply with the federal Fair Housing Act (this can be done by partnering with PTRC, a bank, board of realtors association, or other local group and helping to sponsor a program taught by a qualified entity)
- Conduct meetings with advocacy groups for members of the protected classes (i.e. persons with disabilities, immigrants, refugees, etc.) on the availability of affordable and accessible housing and determine housing needs to plan future projects
- Establish and/or fund fair housing organizations in areas where there are no such organizations, community-housing resource boards or local human relations commissions
- Conduct fair housing testing to ensure that local housing providers and/or lenders do not discriminate (fair housing testing must be conducted by a HUD-certified fair housing agency)
- Assist Housing Choice Voucher program participants to help locate and secure housing outside of racially concentrated areas of poverty (RCAPs) or near-RCAPs
- Conduct outreach to housing providers and housing developers to discuss affordable and accessible housing needs in RCAPs and near-RCAPs
- Incorporate universal design as a requirement for all publicly assisted housing
- Evaluate the local zoning ordinance against the fair housing benchmarks identified in this AI, using the Zoning Risk Assessment Tool. Evaluate the need for amendments to the zoning ordinance and make them.

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APPENDIX: KEY FOCUS GROUP FINDINGS

This appendix contains highlights from focus groups conducted with local and county government staff and many other stakeholders in March 2014. The text reflects opinions held by individual stakeholders that are not necessarily consistent with the research conclusions of this report. They are presented to provide the context of analysis.

City of Burlington

The City of Burlington's most recent CDBG entitlement was $458,706. The last AI was completed in 2010. The City is sponsoring a Legal Aid fair housing event with 65 guests advertised via an insert in residential water bills.

Discrimination complaints are referred to the Fair Housing Project at Legal Aid, whose nearest office is in Pittsboro. Testing for discrimination has never happened in Burlington. Council has zero understanding of fair housing. All council members are at-large, not district-based. The Greensboro FAGO office has gotten very involved recently. City staff members want a better understanding of where discrimination exists and what they can do about any impediments. Fewer complaints do not mean less discrimination here. Rather, it's more correlated with less education about discrimination and recourse. The inspection system for rental units is complaint-based. The inspector must then contact the landlord to get access to the house. This sort of opens the door to retaliation. Not all landlords are treated the same—some "Southern good-old-boy" treatment still occurs.

Transportation is a very important issue. The City's location on a highway (I-80) means a lot of low-wage jobs, but full-time work is difficult to get. The base in this region was farming and factories, both of which have scaled back. The City recently missed out on a BMW plant, which selected South Carolina instead. The company cited a lack of skilled labor as the main issue. There is no public transit – the City has been advocating for it during the last 3 years.

Burlington has the highest concentration of group homes in the state. These interact with the County Department of Social Services. A Burlington Work Group was appointed by the Mayor to investigate group homes and boarding houses, which are predominantly in East Burlington and North Burlington. Some officials are trying to limit or prohibit future development of group homes and boarding houses, although recovering alcoholics and drug addicts are still a protected class according to ADA's definition of disability. A high concentration of these facilities in certain areas is the main issue for council. They are pushing the police department to investigate. They believe some of the operators are not licensed. Local ordinance designates that family care homes are for adults. Group homes are for children. There are different levels, where the more severe the need the higher the level. This ordinance is in compliance with state law. The City limits family care homes to 6 persons. More persons can be added, but then the use changes to commercial.

The zoning ordinance in Burlington was adopted in 1972. Updates have been piecemeal ever since. All residential districts but R15 and R30 allow multi-family by right. The City recently had some downzoning: R12 rezoned to R9 and R9 rezoned to R6. The City defines a family as no more than 2 unrelated persons in a home. This is based on an old rule; there is "no reason" why the definition is narrow. The minimum lot size is 6,000 square feet. R numbers are based on that. Code enforcement makes no effort to reach low-income neighborhoods, although sometimes they will get a push from neighborhood groups to investigate certain areas. Mostly, tenants self-report their own property. Landlords don't have to provide physical accessibility for multi-family units unless they have disabled tenants, although buildings built to NC building code standards are designed to upfit easily. [Note: This is an inaccurate explanation of multi-family accessibility requirements, as ADA standards apply to certain multi-family units whether they are publicly or privately financed and owned.]

Walkability and complete streets are still lacking. Recreation facilities are surprisingly absent from the affluent side of the city. Development has shifted west, and the older neighborhoods are in the east. They are split by the railroad track. The City is putting together surveys in various forms, including outreach through the school system and using Mindmixer, a public participation tool online.

The Alamance County HRC includes housing, employment, education, and LGBT resources. They also extend protection on the basis of sexual orientation, although there is no county ordinance protecting gays and lesbians. The HRC explores possibilities with people regarding discrimination, including referral to Legal Aid, but very few people seek recourse through the HRC. Partnering with Legal Aid, the HRC co-sponsored two workshops on fair housing and reached 50 attendees. Any citizen or group has the right to take part and be on the HRC agenda. The HRC was created as a 501c3 mix, funded in part by the County Commissioners Office. Funding comes mostly from banquets now—the HRC does not receive County funds.

The HRC severed relations with Alamance County in February in order to maintain its mission, particularly in light of what it perceives as a conservative political climate:

- The federal DOJ has filed a lawsuit against the Sheriff alleging discrimination against Latinos. The County Commission has dedicated $175,000 to assist the Sheriff and, the HRC claims, is preventing the DOJ from investigating, as commissioners do not want the DOJ in the County.
- The HRC recruited a member of El Centro, the local Hispanic advocacy organization, for its board, but the County determined that he was unfit to be on the board, along with two other persons with liberal points of view, neither of whom were minorities. The HRC suspects political influence and cronyism in appointments.
- The HRC requested that the State bring experts in the field in to do workshops, though a Commissioner tried to prevent this from happening.

On segregation: In Alamance County, there were historically many small plots of homes that African-Americans were able to buy, along with many traveler plots. Many Hispanic and low-income whites now live there. Whenever someone is renting, it's always in a low-income area. Those who were able to move out did so. They moved to the country where the density was lower. Historical race segregation has not changed because houses tend to stay with families. The most obvious pattern is East-West segregation in Burlington. The West and East sides do have a lot of African-American homeowners who previously worked in factories. Their kids are generally well-educated. They are concerned about the Alamance-Burlington school system. The Latino community tends to use Graham schools. Address-based school assignment is used. Mavin is generally a bedroom community for Durham and Greensboro.

Hispanics are coming into the area because of construction. They also work some farming jobs. They come as communities from Mexico largely, and the highway is a very important resource for them. There has recently been an outmigration due to the housing bust. Webb Avenue, other areas of East Burlington, and trailer parks outside the city are where Latinos are clustered.
Apartments are a new thing in Alamance County. The largest are owned by Burlington Housing Authority or Graham Housing Authority. Some are townhouses or duplexes. Some are now under construction. There is only one apartment building in Alamance County for people with disabilities. Developers recently repurposed factories as housing for low-income families and co-ops.

The largest impediment to housing choice is income. Housing is often unaffordable: a decent 2-bedroom in Burlington costs $900 a month, which seems high. You can't get an apartment for $600-700. Another impediment is wealth inequality. Even people making twice the poverty rate are struggling. People often do not see fair housing as connected to education and transportation.

An important obstacle for many domestic violence service clients is cost or criminal backgrounds. Sometimes this is due to the relationship with their abuser. Cost is a bigger obstacle, though: it's almost impossible to afford housing when transportation and day care are factored into the budget. Staff from one advocacy agency can secure one-bedroom units for clients at $700 a month. Less desirable places in less desirable neighborhoods are $400-500. The vast majority of shelter victims move into public housing. They can stay in the shelter for three months, but getting public housing takes about four months. Without a referral from FAS it can take about six months. They tend to give FAS clients priority. FAS does

this for about 60 women a year. There is also an agency called The Healing Place—it's a private non-profit that also has services.

FAS uses taxis to connect clients with appointments because there is no transit in Burlington. However, they have a limited budget. This limits access to community college. All the jobs in walking distance of the shelter are basically minimum wage. Most clients don't have a relevant work history. Top obstacles are child care, transportation, and financial situation/financial planning.

CHICA: an inter-agency homeless task force that deals with chronically homeless people, who often need more support. This agency has three bilingual staff members. Almost 20% of its outreach is with the Latino population. CHICA conducts a weekly support group for Spanish-speakers. It's safe even for those without documentation — "away from Sheriff's bullying." There is a lack of targeted initiative for the small Native American population in the area. Legal Aid is the go-to resource for fair housing issues.

The Graham PHA waiting list is about three months. All the units are in Graham. They are primarily in low and moderate income areas and were built in the early 1970s. There are no long-standing vacancies—the turnover for a unit is one to two days. The PHA stopped issuing vouchers until the sequester ended. The Section 8 waiting list has been closed since April. The PHA gives certain preferences based on a point system. Elderly and disabled people get 10 points added to their score, and county residents get 5 points. More than 1,500 landlords in the area currently accept Section 8. Voucher holders generally report no issues finding affordable apartments. The PHA has a Reasonable Accommodation Policy for disabled persons. Finding a landlord willing to make reasonable accommodation is difficult. The GHA recently did a fair housing needs assessment for disabled and non-disabled needs in Ralph Clayton Homes. They do an annual assessment for Section 8 as well.

GHA does not consider providing fair housing training to be its own responsibility, but it will intervene with landlords as needed. The authority recently called HUD to report fair housing violations. GHA provides landlord training and information on NC Landlord-Tenant laws. They use MBR to provide housing training to their staff. There was one discrimination complaint in recent history, in which someone was denied housing due to criminal record and filed a discrimination suit. The GHA considers only the most recent five years of a person's history for violence/drugs or termination for housing. The complainant returned when he was eligible to receive a voucher and obtained one.

Burlington Homes recently completed a roundtable discussion in Greensboro about fair housing and how to address these issues. Poverty in Burlington is concentrated in East Burlington. Housing problems and social problems are concentrated there as well. There is no grocery store in East Burlington, and the area is associated with poverty. Homelessness in Alamance County has been increasing, and Burlington Homes now has a homeless program. People are buying homes in East Burlington and Graham, where have been some Habitat homes built recently.

Income far above the minimum wage is required to live comfortably in the area. Most families are now single-parent. Regarding transit, most businesses look for good schools and transportation. There are plans to open a new education center in the area. Because kids are impoverished, they can't learn. They lack computers and technology.

Burlington Homes is pushing Section 3; building 100-unit homes. Using $5 million budget. Incorporating business development skills into the development. HUD likes this because they are pushing very hard for Section 3. Contractors in the area are having difficulty finding people who just want to learn. A FSS program is offered and working well. They are funded for 25 and have 30 in the program. A foundation gives $1,000 to sponsor 1-2 extra people a year.

Mayor Wall grew up in East Burlington and wants improved recreation facilities, better health, etc. The planning department is working on this. Business development and food deserts are particularly important. The Planning Department wants to do a plan for East Burlington. Ebeneezer is building housing for ex-prisoners and domestic violence survivors. The main low-income school in the area is Cummings. It is very important for City Council to buy into public transportation. It is "a true government service". Seniors

are discouraged with navigating services for them: nutrition, assistance, access, etc.

The biggest impediment to fair housing is the mindset of people. Segregation is often really based on income. Housing authority residents are often not perceived as legitimate constituents. They are trying to get youth on committees and boards to have more representation by the youth.

The Alamance County Interagency Council for Homelessness Assistance should be a marking body to benchmark, but it's not. The organization was formed by churches in 1982, and is funded 20-25% by government with the remainder funded by foundations. ACICHA wants to become a larger organization that does more activities and provides more resources. It does not currently have a 10-year plan to end homelessness. The agency spends $2,000 a month on transportation for clients through a passenger van. Clients also have the opportunity to request an extension at the shelter. They must meet with housing specialists within three days of being at the shelter.

The biggest impediment is spatial mismatch: most jobs are in the West, while affordable housing is in the East. It's not walkable and there are no sidewalks. You're also lucky if you get 24 hours in two weeks at entry-level jobs. The living wage in the area is $12-14 an hour. People often end up in boarding lodges because housing is unaffordable. More housing is needed near job centers. Other shelters are very restrictive and Christian-based. Allied Churches is the only other option in town.

Looking for some efficiency apartments for permanent transitional housing. This works well with 18-19 year-olds. One agency has 600-1,000 volunteers annually. It must also consider mental health, especially with group homes and boarding houses. The poor quality of local group homes is due to poor management. This causes unsafe conditions. It's also difficult to find housing for people with criminal records.

There are high housing costs in these communities. It's expensive to maintain many of the homes due to their age. Average rent is around $500, but older homes cost $300-400 a month in utilities. This limits capacity to establish a cash reserve.

People sometimes have to turn down jobs because they can't get there. Wages are getting lower as well. Many textile temp people go to them for resources. Many from the Alamance-Burlington school system as well. Job training opportunities are generally good, such as those provided by Alamance Community College. The college has been seeing many people with two jobs come in. A lot of jobs don't offer living wage or medical benefits. The average wage is about $9 per hour.

CCSA works with the Burlington and Graham Housing Authorities. Clients can use funds to start a business, buy a home, or go to school. CCSA gets information to the Hispanic population by going to them and presenting to families using an interpreter. The agency does outreach twice a year and has certified counselors available. During their assessments and programs, the Latino community does ask about discrimination. Families seem to feel comfortable reporting discrimination; CCSA received two reports last year, which it refers to the State Fair Housing Office. Discrimination typically is in the renter market. One particular bank was suspected of discrimination because of callback issues.

Criminal records are a major barrier for employment. Many people won't hire felons. There is discrimination in public housing based on criminal records. Another barrier is education, which limits prospects. Landlords are also reluctant to rent to people with disabilities like mental illness. They use criminal background as an excuse. The City has invested "a lot" of CDBG money to complete infrastructure work that benefited group homes, which require a special use permit requirement. There is an $83k HUD grant to run a six-bed facility in Burlington.

City of High Point

High Point is in the process of rewriting its entire development ordinance handbook to broaden its flexibility. The new ordinance handbook will allow for residential use, both single and multi-family, in more areas. It lowers lot sizes as well. High Point noticed that lot sizes have been falling on zoning approvals. These might be cases were land would be rezoned. The City is slow to jump on any bandwagon for change. There has been some conversation about inclusionary zoning, but it is not likely to go anywhere, due in part to resistance from the development community.

Group homes are treated as single family homes since the last AI was completed in 2009. The State of NC has said that communities may (but are not compelled to) impose a separation requirement. The City can choose to require up to ½ mile buffer between every "family care home" of six or fewer. Council has decided to impose this ½ mile separation. One member thought that this was a violation of Fair Housing Law because it singles out group homes for separate treatment. These facilities do tend to concentrate in certain parts of town. Most of the area that still exists for group home development under the current buffer is in the affluent North High Point.

High Point University is a major player in the City. This has had a huge effect on the local economy. Neighborhoods taken over by the university are predominantly minority and low-income. The University used its leverage to maintain and buy lots of property, purchasing at an average of 150-200% of value in expansion area. It bought a nursing home recently. There is pressure to sell because homeowners feel they have been left with no choice. The local quality of life has been ruined with construction and loud students. The City worked out a University Area Plan for zoning purposes, though there was an issue with community inclusion.

Years ago, High Point annexed a large amount of property. This is no longer politically feasible. There has been only voluntary annexation recently, and the state legislature also made it extremely difficult to annex. Annexation agreements are maintained with many cities just in case. The City recently turned down several annexations in satellite places. Most growth is coming in from the North, which is pushing urbanization into Davidson County. The County has adopted a requirement that nobody may annex into High Point without permission from commissioners.

About 400 acres are currently zoned for multi-family housing. There is no transportation link, so development would probably not be affordable. Generally, areas suitable for multi-family development are not located in the urban core. There has been very little redevelopment there besides university work. Slumlords there won't invest in the properties they own, which are mostly in high-minority areas.

One significant barrier for immigrants is qualifying for a loan. Many banks don't have people to help with leverage. They often have a translator, but not an interpreter, which is very different. For less-spoken languages, getting a loan is a very complicated process. Nobody in the lending community can help the Pakistani/etc. members of the community. They must bring in English-speaking family members.

World Relief has brought 6,000 people to High Point since 1990. The agency has 1,000 clients a year, including duplicates. It's funded heavily by the Department of State. World Relief serves 14-15 ethnicities speaking 80 different languages, including many Cubans, Burmese, and Bhutanese. The Department of State requires some languages to be spoken on staff, but it is difficult to find translators. Kids end up needing to be the translator for their older family members, which is problematic. Each year the President/ Federal government decides what staff is coming. Their responsibility is to find housing, medical care, etc. before refugees even get there. Then they help them get established. There is currently a three-month wait and a complicated process to obtain food stamps in NC. Medicaid and Medicare do not pay for interpreters.

Landlords will often say "must have income and social security" to ban refugees since they can't discriminate based on their refugee status. No large corporate places will do refugees. They go to mom-and-pop places and try to convince them. The main barrier is landlords not believing that they will get a job.

Nobody has discriminated against refugees based on their refugee status, but landlords find ways to deny them.

One fair housing issue is the steering of a community-based population that wants to be housed near their own community. Sometimes tenants will break lease and go live with people from their native countries. There is also an issue with undocumented people fearing the landlord, because the landlord knows they're undocumented. They will get into bad situation and end up living in unacceptable housing. The City helps with this and is receptive—Department of Human Relations helps.

There are numerous schools designed for ELL students in High Point for kids. The issue is adults. They need employment, interpretation, and transportation. They are trying to get refugees to send less money home as remittances and consider buying a house. The city caters to the rich with the goal of drawing international investment. They tend to shut down activities that aren't related to the furniture industry. It is an unfriendly small business climate. The university is doing wonderful things for High Point, but its development pushes people into a concentrated area in the South where it's affordable. But there's nothing down there. The City must allow the Latino and international population to start businesses and become middle class instead of funding pet projects, as they currently do. The City should conduct an affordable housing workshop with money coming from DC Realtors branch. There is a lot of interest. Boeing was looking at the High Point area for a plant but said the same thing as BMW: there is a lack of skilled labor in the area. There is major doubt about the usefulness of City projects.

Transportation and inequality are the main issues. High Point Regional Hospital and Airmark is very good, but many jobs are not well-paying. Chicken factories are 45 minutes to one hour away. There are also no sidewalks in most places in High Point, which is dangerous. The bus shuts down at 6 PM and is closed on weekends.

The top issues in the area are jobs and food deserts. The State of NC requires that you can't put amenities in food deserts. These are in the urban core, so you can't actually build affordable housing in the area because there's no currently certified grocery store. The USDA set the parameters of what a food desert is.

Homeless shelters are packed, but ask for social security number and photo ID if they receive federal funding. Therefore, people without documents end up at the emergency room just for shelter. There is a lack of rent funding available from the community resource network. The Mental Health Reform of 2002 made it difficult to offer any higher level of care. Agencies find themselves having to choose between caring for people with mental health issues and people with babies. Affordable housing in the area is often substandard but rented anyway. The average disability check is $700, and it's difficult to find non-substandard affordable housing on that budget. The shelter waiting list is at 18 months. Five years ago it was 12 months. There has been a lack of progress since the last AI was done. Schools see a 40% turnover rate because it's so difficult to find non-substandard affordable housing. There are also a high number of youth couch surfing; almost 900 to 1,300 students in Guilford County are homeless. There is a lack of a day shelter in High Point—the closest one is in Greensboro despite a significant local need.

Low-income or no-income people cannot find affordably priced housing on the private market. Because of the long wait at the local housing authority, placing clients is more practical via local landlords. There is a three-year list in Greensboro, which is closed for 1-2 bedrooms, and an 18-month waiting list in High Point. The new HEARTH Initiatives requires housing first, although eight out of 10 people receiving placement destroy the apartment. Substance abusers won't open the door for case workers. Instead of emergency housing, they should offer emergency solutions. Small business initiatives and microloans are important here.

High Point government needs to get new people at the table. A small group of elites are running decisions, excluding other opinions. The City is politically driven through the market: If the furniture industry doesn't want it, it will not get done. High Point City will spend large amounts of money on frivolous projects. The most affordable and ignored area of the city is the South Side. There is nobody

Downtown. The High Point plan ignores the South Side in terms of investment plans. The heavy reliance on furniture has removed the middle class. There is a perception that everyone non-white is an illegal Mexican. A lot of people end up moving away, often to Texas or New York, for jobs and density. There is a Diversity Culture Committee.

City of Greensboro

The former Planning and Community Development has been separated into Neighborhood Development, now responsible for code compliance, grants/finance, housing services and homelessness issues, and Planning, under a different assistant city manager, which focuses on long-range and short-range planning and development issues, updating the Comprehensive Plan and capital improvement planning. In other reorganization, the Community Resource Board, which previously made recommendations about funding, has been rolled into the Planning Board. The Planning Board is not always aware of fair housing requirements, so education will be required. Planning Board is more a regulatory board than the Community Resource Board, so the process has "lost a little bit of the public feel."

The City's CDBG budget is about $2M, including program income. It has been committed to particular target areas for past several years: Arlington Park and Asheboro are active; Willow Oaks and East Side Park are not. The City identified these areas as in need of revitalization. Housing rehabilitation occurs citywide. The City typically funds the same things each year. Almost all public services are related to homelessness prevention. The City is spending to the 20% CDBG public service cap. The City phased out human services about a decade ago, due to decreasing appetite for this type of project on the Planning Board. The City is also not at the 30% limit for demolition activities. The CDBG budget includes $18,000 for fair housing in the form of salary support for human relations.

The City is the lead agency in a HOME consortium. Each grantee receives its own funds, but grants are managed centrally. The consortium distributes HOME funds via RFPs. There are no HOME target areas – projects occur where developers find land. HOME also supports down payment assistance. Due to changes in HOME regulations, this year's RFP is all multi-family, no single-family. Not sure yet where/how to fund single-family with HOME. Would need repair reserve to transfer to buyer, set up like condo/co-op. No speculative building – some nonprofits will need to change operating model to participate. The City's CHDOs are all still certifiable.

NIMBYism issue in a 77% minority tract: the public housing authority attempted to build on a site here, wrote an inadequate neighborhood and site standards justification; the neighborhood sued. The PHA has now partnered with a tax credit developer and requested a HOME grant to build family apartments on same site. The site is on the very edge of said tract; across the street is outside RCAP. Project hasn't received credits yet.

The local Housing Trust Fund supports affordable housing development in the amount of about $1.8M annually. Administrative expenses became controversial, but "direct as much as we can toward affordable housing." Used as a HOME match, homelessness prevention, for Greensboro Housing Coalition. The City also has $150k via a non-federal source that it could use for landlord education or similar undertaking.

The City is a HOPWA grantee. HOME TBRA has been more successfully administered through HOPWA than through the PHA. There's a very large wait list, but PHA has been "very slow to get vouchers on the ground." HOPWA waiting list for vouchers currently includes 85 in Greensboro. Not much turnover; people who get a voucher tend to keep it. Every week, Central Carolina Health Network receives calls from people in FL and NY who want to be on the wait list. "When we have vouchers, people can find places to live. The problem is that we don't have vouchers." Stigma is an issue for HIV/AIDS patients in finding housing. Every week, two to three patients identify housing as a barrier. Some are dealing with other issues, such as substance abuse or mental health.

Most HIV/AIDS patients have incomes below poverty, want to be in the Section 8 program (wait list closed last year) or the HOPWA voucher program. Housing authority has

a preference for patients – CCHN provides funds to PHA for HOPWA vouchers. Don't know of any clients tapping into HOME TBRA. Some Shelter+ money is available.

Group homes tend to be more for developmental disabilities. Development affected by DOJ lawsuit at the state level. NIMBYism hasn't been much of an issue during last five years here because there hasn't been enough of an effort to build affordable housing. All construction is occurring in higher-end areas. "Contract zoning" would prevent council from requiring inclusionary setasides (Council can't stick developers with this requirement on a case-by-case basis, would need to legislate in advance).

The recently conducted FHEA didn't consider local concerns – identification of "high opportunity" areas, for instance, included areas made inappropriate by land use or environmental issues: runway clearance zones, swamps, etc. FHEA also identified two RCAPs that happen to be student neighborhoods near a historically Black college.

There's reluctance here to create an inclusionary housing program and some confusion over what is allowed by state law. Some other NC communities have such programs. With regard to using federal funds to create affordable opportunities in higher-cost areas: "If someone wanted to do affordable housing in West Greensburg, we absolutely would award more HOME funds to make it happen." It would be a difficult conversation to spend HOME funds in a more expensive area when homeless people are on the corner, but choice is needed.

The Planning Department's biggest challenge is ensuring that discussion about proposed housing is about land use, not tenure or rent price, and remains objective. The number of low-income households in the city has doubled during the last 10 years, and not all moved here. Public perception is kinder to elderly households than to lower-income families. Boards and commissions receive regular training. The City attorney helps with language, guides what elected officials can and cannot consider. This council and the previous one have been very focused on housing, due in part to strong local advocates.

Housing costs in Greensboro are traditionally very high, and land and is controlled by relatively few families. The City used to be considered more expensive than Raleigh. The majority of the City's growth occurred after 1960 and was sprawling in nature. Greensboro has about the same square mileage as Raleigh, but half the population.
There is a need for single efficiency-style apartments downtown, around 300 square feet. This would help retain recent grads, could be affordable to people transitioning out of homelessness. Would need to be managed the right way, select the right location. Successful example – in Charlotte, a PHA partnered to create such units (affordable efficiencies), which took a cut out of chronic homelessness.

Finding an affordable site to develop nonprofit housing in a non-impacted area is "an issue." Finding such land zoned multi-family by right is "nearly impossible." These sites are typically on the outskirts, not near amenities. The City prefers sites to be within ½ mile of amenities; state funders prefer within one mile. The City expanding its preference to one mile would open up more opportunities. Sites far from transit are at a disadvantage in rezoning, but sites near transit are "pretty much all gone." Frustrating because "99% of [this CHDO's] residents have a car."

It would be helpful for developers if the City areas where it wants to direct affordable housing or subsidized land acquisition, "became proactive that way," instead of expecting developers to find and acquire land to compete.

There are "huge disparities" in the condition of housing and the opportunities available in Greensboro. Members of the protected classes are "disproportionately confined to terrible housing." Immigrants who don't have papers or speak English face major housing barriers. They are protected in theory, not in practice. Lots of Hispanic-occupied housing just outside city limits is in deplorable condition. State landlord/tenant law requires decent conditions, but enforcement occurs only in a few cities.

Greensboro previously had a successful systematic rental inspection program, but landlords lobbied the state, which then prohibited all municipalities from proactive

rental inspection. Now the City's inspection program operates on a "reasonable cause" (complaint) basis.

It's an economics problem: If a landlord improves a property to mitigate poor conditions, the renter could no longer afford to live there without subsidy. Standard monthly rent in Greensboro is $700. Tenants in substandard housing won't complain due to the risk of losing the place and being unable to afford another. (Landlord has incentive to evict a complaining tenant because code is much less likely to be enforced on an empty unit.) Need to find a bridge for this gap: Landlords can pay for the expenses required to create decent housing, tenants can still afford the rent.

Need to strike a balance: broaden locational choice without running people out of neighborhoods. We need to preserve the value of assets (schools and homes) in struggling neighborhoods.

Surry HOME Consortium

Surry consortium consists of four rural counties along Interstate 40, not along the Raleigh corridor. The area has suffered a "tremendous loss" of industry overseas. It was previously the sock and t-shirt capital of the world. Tobacco was the largest local industry, whereas the fields are now covered by viticulture.

Jobs are central to economic problems. Need to bring a manufacturing base back into this country. The loss "decimated this area." More than 500 people showed up for a job fair with 20 jobs. An ad in the paper for a job with a decent wage will attract 100 applicants. The majority of people want to find jobs. Many commute long distances to find work, across state lines.

"The new poor" are products of the current economic environment: People who are accustomed to making a good wage aren't anymore, are losing their homes. Rent is high because people have lost homes (vacancy rate low, market tight)

Very few people are able to land a job that would allow them to afford decent housing. Wages are low, rent and unemployment are high. Prices keep going up, but wages don't. Some can afford a one-bedroom slum; some can't afford heat AND dinner. The middle class has disappeared. Need to raise up the bottom to reach the middle.

Utility bills can reach close to $300, but subsidy utility allowance is only $80. Many units have baseboard heat, and landlords don't want to upgrade. Sometimes clients heat and live in only one room of the unit. Some heat using an oven or space heater. Landlords ought to be held accountable to keep rentals at certain standards. They're charging $400-$500 for a minimal place with drafty windows. There's some good rental housing available in Mt. Airy and Surry area, harder to find in Elkin.

Surry County's housing stock is probably 30% trailers, compared to 20% in the other counties. About 30% to 40% of voucher households live in trailers. County manages Dobson's code enforcement. A couple apartment buildings are in terrible shape. There's a mobile home park "no one would mind being bulldozed." However, condemning a property requires nearly an act of God, and even then, how does it get paid for?

Davie County has a growth management plan reviewed every five years. The County has no public sewer service, so won't see multi-family housing development. Septic determines densities per acre. Ordinance has been amended to add duplexes, but builders have not been interested. To create the growth management plan, Davie County worked with municipalities and drew growth rings where "we wanted to see the type of growth we wanted." Unclear whether it accomplished this aim. Land costs have remained steady, comparatively high. Davie County hasn't seen a new mobile home park since 1993. Commissioners reluctant to approve. Many exist already, and space for more homes exists there. Regulations are stringent, with minimum lot sizes comparable to those required for single-family homes.

In rural areas of Yadkin County, affordable housing is more often in the form of manufactured housing than multi-family. The County allows maybe two manufactured homes on a regular lot, but three or more start to become a park. There was a large increase in manufactured housing during the last five years, not in parks. The County allows accessory dwellings in all districts.

Small subdivisions of one-two lots common; large are very uncommon.

Surry County has never received an application for a mobile home park. County's solid waste ordinance is "pretty broad," but doesn't cover housing conditions. There is no landlord registration program.

Yadkinville is an older town with an older housing stock, mostly single-family. County conducts building inspections and code enforcement. Also true of Jonesville. Inspection for every change in occupancy "wouldn't fly." Yadkinville's key issues are an aging stock and code enforcement, absentee landlords.

Jonesville has three or four multi-unit developments, all built within last 20 years, well maintained. Single-family homes purchased by investors – proportion of renters to owners increasing steadily. Renters less invested in neighborhood, less committed to maintenance.

A housing shortage exists in Dobson, particularly multi-family. Staff receive calls from parents of prospective students at Surry CC: apartments are restricted or dull, wait lists. The largest employer is Wayne Farms (700-800). Workers are bused in from Greensboro, Winston-Salem.

Advocates predict that there will be "a slew of elderly in this area with nowhere to live" because "people don't take care of family anymore." People are more geographically scattered, and traditional family values have changed. There are fewer multi-generational households. The local average age on the rise as younger folks move out to more employment-rich areas. There's a need for affordable senior housing, and it will be overwhelming soon, a "silver tsunami."

Many Hispanic households live in trailer parks. There has been a change in the demographics of migrant workers from tobacco to grapes. More seasonal than permanent. One-third of 385 enrolled in Head Start are Hispanic; otherwise, not a lot of clients have limited English proficiency. Overcrowding is a problem among Hispanic households. Have seen 20 people in a three-BR home. This community is family-oriented, take care of their own. They are also distrustful of social services, threat of having children removed.
There is a "huge" homeless population, including some living with relatives or couchsurfing, some living in cars: "We're not used to seeing that in these counties."

Mt. Airy has some slumlords and has seen an increase in absentee landlords. The town is trying to take a more proactive stand. Its Redevelopment Commission is having meetings to determine whether a board should be formed.

Mt. Airy is a blue-collar town. Probably half of people would qualify to live in subsidized housing. Nonetheless, there were NIMBY reactions to a tax credit proposal on an 11-acre site (on Hawaii): traffic problems, fear of drop in property values, "enough rentals here already." Would probably have rejected cluster of patio homes, might have been OK with single-family. It's "nothing I would describe as bigotry," but "general wariness of multi-family density."

Transportation is an important need for families, the elderly, those going to work, those going to appointments, everybody. The YVEDDI circulator has made a difference.
HOME consortium would need to reauthorize project-basing of vouchers. None currently. Consortium has 800 vouchers. Vouchers are about 50% in towns, 50% rurally scattered. Would be interested in plotting voucher household race by location. The voucher waiting list is open in Stokes and Yadkin counties, closed in the other two. Stokes has an older population, less demand. The bulk of voucher holders/applicants are in Surry County. Many voucher holders and trailer parks are in Cooleemee, Davie County. Not necessarily where jobs are.

"If you're a mixed-race household, you don't look in King [Stokes County] – they're lily white and want to stay that way." [Note: King was pop 6,904 in 2010, 97.7% white]

HOME funds have rehabilitated family rental units (The Hollows) in Boonsville. HOME regulations are too onerous to make rental rehab feasible for smaller operations (annual inspections, income recertification etc.).

The average market rent doesn't incentivize new construction: It's difficult to profit if a two-bedroom unit fetches only $500. The

only thing that would seem to work toward Mt. Airy's goal of affordable new construction is tax credit development of a scale large enough to make the numbers work.

APPENDIX: GLOSSARY OF TERMS

G

Affordable Housing: Generally defined as housing in which the occupant is paying no more than 30 percent of gross income for gross housing costs, including utility costs

AIDS and Related Diseases: The disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome

Alcohol/Other Drug Addiction: A serious and persistent alcohol or other drug addiction that significantly limits a person's ability to live independently

Assisted Household or Person: An assisted household or person is one receives benefits through the Federal funds, either alone or in conjunction with the investment of other public or private funds

CDBG: Community Development Block Grant, a program administered by the United States Department of Housing and Urban Development to fund housing and community development activities nationwide

Clustered: Being close together in a group, especially geographically. The opposite of dispersed or scattered.

Cost Burden >30%: The extent to which gross housing costs, including utility costs, exceed 30 percent of gross income, based on data published by the U.S. Census Bureau.

Cost Burden >50% (Severe Cost Burden): The extent to which gross housing costs, including utility costs, exceed 50 percent of gross income, based on data published by the U.S. Census Bureau.

Disabled Household: A household composed of one or more persons at least one of whom is an adult (a person of at least 18 years of age) who has a disability. A person shall be considered to have a disability if the person is determined to have a physical, mental, or emotional impairment that:
(1) Is expected to be of long-continued and indefinite duration;
(2) Substantially impeded his or her ability to live independently; and,
(3) Is of such a nature that the ability could be improved by more suitable housing conditions.

A person shall also be considered to have a disability if he or she has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001-6006). The term also includes the surviving member or members of any household described in the first sentence of this paragraph who were living in an assisted unit with the deceased member of the household at the time of his or her death.

Dissimilarity: A demographic measure to compare the distribution of subpopulations, indicating how much one group is spatially separated from another within a community.

Elderly Household: For HUD rental programs, a one or two person household in which the head of the household or spouse is at least 62 years of age.

Elderly Person: A person who is at least 62 years of age.

Entitlement Community: A city or urban county that receives CDBG funding for housing and community development activities. Communities are determined to be entitlement communities based on a formula calculated by the United States Department of Housing and Urban Development

Existing Homeowner: An owner-occupant of residential property who holds legal title to the property and who uses the property as his/her principal residence.

Family: The Bureau of Census defines a family as a householder (head of household) and one or more other persons living in the same household who are related by birth, marriage, or adoption. The National Affordable Housing Act of 1992 adds: "Family" includes but is not limited to (a) an elderly family or single person, (b) the remaining member of a tenant family, and (c) a displaced person.

Family Self-Sufficiency (FSS) Program: A program enacted by Section 554 of the National Affordable Housing Act which directs Public Housing Agencies (PHAs) and Indian Housing Authorities (IHAs) to use Section 8 assistance under the Housing Choice Voucher program, together with public and private resources to provide supportive services, to enable participating families to achieve economic independence and self-sufficiency.

First-time Homebuyer: An individual or family who has not owned a home during the three-year period preceding the HUD-assisted (or otherwise assisted) purchase of

a home that must be used as the principal residence of the homebuyer, except that any individual who is a displace homemaker or a single parent (as defined in 24 CFR 92) may not be excluded from consideration as a first-time homebuyer on the basis that the individual, while a homemaker or married, owned a home with his or her spouse or resided in a home owned by the spouse.

For Rent: Year-round housing units that are vacant and offered/available for rent. (U.S. Census definition)

For Sale: Year-round housing units that are vacant and offered/available for sale only. (U.S. Census definition)

Frail Elderly: An elderly person who is unable to perform at least three activities of daily living (i.e., eating, dressing, bathing, grooming, and household management activities).

Group Quarters: Facilities providing living quarters that are not classified as housing units (U.S. Census definition). Examples include: prisons, nursing homes, dormitories, military barracks, and shelters.

HOME: The HOME Investment Partnership Program, which is authorized by Title II of the National Affordable Housing Act.

Homeless or Homeless Individual or Homeless Person: Includes:

(1) An individual who lacks a fixed, regular, and adequate nighttime residence; and
(2) An individual who has a primary nighttime residence that is
a. 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);
b. An institution that provides a temporary residence for individuals intended to be institutionalized; or,
c. A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Homeless Youth: Unaccompanied person 17 years of age or younger who is living in situations described by terms “sheltered” or “unsheltered”.

Household: One or more persons occupying a housing unit (U.S. Census definition). See also “Family.”

Housing Problems: HUD defines housing problems as (1) cost burden of 30 percent or more (i.e., paying more than 30 percent of gross income on monthly housing expenses) and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Housing Support Services: Services provided to assist low income renters or homeowners to locate or remain in their housing units, including counseling, child care, transportation, substance abuse treatment, training in homemaking and parenting skills, money and household management, counseling in homeownership, job placement, and other necessary and appropriate services.

Housing Unit: An occupied or vacant house, apartment, or a single room (SRO housing) that is intended as separate living quarters. (U.S. Census definition)

HUD: The United States Department of Housing and Urban Development, a Cabinet department in the Executive branch of the United States federal government

Institutions/Institutional: Group quarters for persons under care or custody. (U.S. Census definition)

Large Related Household: A household of five or more persons that includes at least one person related to the householder by blood, marriage, or adoption.

LIHTC: (Federal) Low-Income Housing Tax Credit.

Low-Income: Households whose incomes do not exceed 80 percent of the median family income for the area, as determined by HUD with adjustments for smaller and larger families. HUD income limits are updated annually.

Manufactured Home: A structure, transportable in one or more sections, which is built on a permanent chassis, designed to be used as a dwelling without a permanent foundation, and constructed no earlier than 1976.

Median Family Income (MFI): Median income is the amount which divides the income distribution into two equal groups,

half having income above that amount, and half having income below that amount. MFI is the median income of all households with two or more persons related through blood, marriage or adoption. Family households are a subset of all household types; therefore MFI is not interchangeable with median household income (MHI), which additionally includes other types of non-family households, such as non-related persons living together.

Mobile Home: A Manufactured Home (see above) constructed before 1976.

Moderate-Income: Households whose incomes are between 51 and 80 percent of the median family income for the area, as determined by HUD, with adjustments for smaller and larger families.

Modular Home: A factory-built structure that is not built on a permanent chassis and is not transportable, but is assembled on-site, is usually attached to a permanent foundation, and constructed no earlier than 1976.

Non-Homeless Persons with Special Needs: Includes elderly, frail elderly persons, persons with AIDS and their families, persons with disabilities (mental, physical, developmental), and persons with alcohol and other drug addiction.

Non-Institutional: Group quarters for persons not under care or custody. (U.S. Census definition)

Occupied Housing Unit: A housing unit that is the usual place of residence of the occupant(s).

Other Household: A household of one or more persons that does not meet the definition of a Small Related household, Large Related household or Elderly household.

Other Income: Households whose incomes exceed 80 percent of the median family income for the area, as determined by HUD, with adjustments for smaller and larger families.

Other Low-Income: Households whose incomes are between 51 and 80 percent of the median family income for the area, as determined by HUD, with adjustments for smaller and larger families. (This term corresponds to moderate-income in the CDBG Program.)

Other Vacant: Vacant year round housing units that are not For Rent or For Sale. This category would include Awaiting Occupancy or Held.

Overcrowded: A housing unit containing more than one person per habitable room (HUD definition)

Owner: A household that owns the housing unit it occupies. (U.S. Census definition)

PART: Piedmont Authority for Regional Transportation, the regional transportation authority within the Piedmont Triad.

Permanent Supportive Housing: Affordable rental housing for low-income or homeless persons with severe mental illness, substance abuse, or HIV/AIDS, linked in some way with flexible community-based services that are available to tenants who need them, but are not required.

Piedmont Triad: A 12-county area encompassing all of Alamance, Caswell, Davie, Davidson, Forsyth, Guilford, Montgomery, Randolph, Rockingham, Stokes, Surry, and Yadkin Counties.

Poverty Level: Households with incomes below the poverty line as defined by the Office of Management and Budget and revised annually. For the Consolidated Plan, HUD defines poverty level as at or below 30 percent of median income.

Privately Assisted Housing: Housing that is not public housing, but is guaranteed to be affordable due to funding sources and/or subsidies attached to the housing development

Project-Based Rental Assistance: Rental assistance provided for a project, not for a specific tenant. Tenants receiving project-based rental assistance give up the right to that assistance upon moving from the project.

PTRC: Piedmont Triad Regional Council, the lead regional organization for the Piedmont Triad region. This voluntary organization makes and implements joint regional decisions, provides management, planning, and technical services to local governments, and administers other regional coordination and planning efforts.

Racially/Ethnically Concentrated Area of Poverty (RCAP/ECAP): A geographic area

where both high poverty rates and a high percentage of minorities are clustered. A racially concentrated area of poverty (RCAP) or ethnically concentrated area of poverty (ECAP) is generally defined by HUD as a geographic area where the total non-White population in an area is greater than 50% and the poverty rate is greater than 40%. While there are several other viable calculation methods that may be utilized, this AFH uses this common HUD-given definition as well, at the block group geography. References to RCAPs in this research refer to block groups where the total non-White population is greater than 50% and the poverty rate is greater than 40%.

Rental Assistance: Payments provided as either project-based rental assistance or tenant-based rental assistance.

Renter: A household that rents the housing unit it occupies, including both units rented for cash and units occupied without cash payment of rent. (U.S. Census definition)

Renter-Occupied Unit: Any occupied housing unit that is not owner-occupied, including units rented for cash and those occupied without payment of cash rent.

Section 8 Housing Choice Voucher program: A form of tenant-based rental assistance, this is the federal government's major program for assisting very low-income families, the elderly and the disabled to afford decent, safe, and sanitary housing in the private market. Participants receive a voucher to find their own housing, including single-family homes, townhouses and apartments. Housing choice vouchers are administered locally by public housing agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program.

Section 215: Section 215 of Title II of the National Affordable Housing Act. Section 215 defines "affordable" housing projects under the HOME Program.

Self-Sufficiency: A household functioning independently of federal, state, or local assistance (excluding entitlements).

Service Needs: The particular services identified for special needs populations, which typically may include transportation, personal care, housekeeping, counseling, meals, case management, personal emergency response, and other services to prevent premature institutionalization and assist individuals to continue living independently.

Severe Cost Burden: See Cost Burden >50%.

Severe Mental Illness: A serious and persistent mental or emotional impairment that significantly limits a person's ability to live independently.

Small-Related Household: A household of two to four persons that includes at least one person related to the householder by birth, marriage, or adoption.

Substance Abuse: See Alcohol/Other Drug Addiction.

Substantial Rehabilitation: Rehabilitation of residential property at an average cost for the project in excess of $25,000 per dwelling unit.

Supportive Housing: Housing, including Housing Units and Group Quarters that have a supportive environment and includes a planned service component.

Tenant-based Rental Assistance (TBRA): A form of rental assistance in which the assisted tenant may move from a dwelling unit with a right to continued assistance. The assistance is provided for the tenant, not for the project. The Section 8 Housing Choice Voucher program is one form of TBRA.

Total Vacant Housing Units: Unoccupied year round housing units. (U.S. Census definition)

Vacant Housing Unit: Unoccupied year round housing units that are available or intended for occupancy at any time during the year.

Very Low Income: Households whose incomes do not exceed 50 percent of the median family income for the area, as determined by HUD, with adjustments for smaller or larger families.