

City of Goldsboro, NC FY 15-19 Analysis of Impediments To Fair Housing Choice



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FY 15-19 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



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I. INTRODUCTION AND EXECUTIVE SUMMARY

ANALYSIS OF IMPEDIMENTS BACKGROUND

The FY2015-2019 Analysis of Impediments to Fair Housing Choice (the AI) was prepared for the City of Goldsboro, North Carolina to meet the requirements of the Housing and Community Development Act of 1974 and is a part of the City's certification to "affirmatively further fair housing (AFFH)." The City is a recipient of federal block grant funds including Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) funds from the U.S. Department of Housing and Urban Development's (HUD) federal block grant funding administered through its Community Planning and Development (CPD) office. As such, it must certify that it will "affirmatively further fair housing" (AFFH) in accordance with federal regulatory requirements at 24 CFR 91.225(a) (1). With the certification, the City committed to conduct the AI within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.¹

The AI is usually conducted in tandem with the Consolidated Plan, also required by HUD, and HUD recommends that the AI is updated at least once every three to five years. The previous AI was completed in July 2008." The basis of the AI is the federal Fair Housing Act and equivalent state and local laws.

The City, through its Community Development Department, contracted with ASK Development Solutions, Inc. to assist City staff in conducting the activities related to and preparing the AI report. The recommendations from the report will be used as a basis for the City's development and implementation of a Fair Housing Plan (FHP).

CONTEXT

Equal access to housing is one of the principles of equality desired for everyone who lives in the United States. Equal access includes protections from discrimination in housing; sale, rental, and financing of dwellings; lending; home appraisal; insurance and accessibility and the freedom for anyone to live where they choose.

FAIR HOUSING LAWS AND REGULATORY FRAMEWORK

The Federal Fair Housing Act (FHA) or Title VIII of the Civil Rights Act of 1968, and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability (physical and mental). The persons represented in the above categories are referred to as "protected classes". The FHA covers most housing types including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a

¹ <http://www.gpo.gov/fdsys/pkg/CFR-2004-title24-vol1/pdf/CFR-2004-title24-vol1-sec91-225.pdf>.

U.S. Government Printing Office retrieved March 20, 2015

real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

Section 808 of the Act says that the authority and responsibility for administering the Act resides with the Secretary of Housing and Urban Development. Among the functions of the Secretary are to prepare an annual report to Congress; and *administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter.*

The National Affordable Housing Act of 1990, which governs the HOME program, as amended, {Section 105 (b)(15)} requires jurisdictions to include a certification with the housing strategy certifying that the jurisdiction will *affirmatively further fair housing*. Specifically, Consolidated Plan Regulations at 24 CFR 91.225 (a) state that the AFFH certification must be included in the annual submission to HUD.

The regulations governing the CDBG program also address fair housing requirements. Under 24 CFR 570.506(g) – Records to be maintained - the grantee must maintain fair housing and equal opportunity records containing: a) Documentation of the analysis of impediments; and b) The actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in the recipient’s community. Also per 24 CFR 570.601 (a) (2) the Fair Housing Act (42 USC 3601-3620) applies. It states that “in accordance with the Fair Housing Act, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to *affirmatively further the policies of the Fair Housing Act*. Section 104(b)(2) of the Act, for each community receiving a grant under subpart D goes on to state the grantee shall be required “*to assume the responsibility of fair housing planning*” the AFFH process as detailed above.

Finally, the Consolidated Plan certifications included under the “Specific CDBG Certifications” states that the Entitlement Community certifies under “Compliance with Anti- Discrimination Laws - that the grant will be conducted and administered in conformity with title VI of the Civil Rights Acts of 1964 (42 USC 2000d) , the Fair Housing Act (42UAC 3601-3619), and implementing regulations.

In addition to the abovementioned federal requirements, the City of Goldsboro is required to comply with any state and local fair housing laws.

RESPONSIBLE AGENCY

The City of Goldsboro’s Community Development and Community Affairs Departments are responsible for the advancement of human/civil rights issues such as fair housing, equal employment, unfair treatment, and equal access to public services/accommodations. The Community Affairs Department is the official designated City department responsible to receive, investigate, and mediate complaints of discrimination, such as fair housing. The Community Development Department is responsible for ensuring that the City’s fair housing requirements are met.

PURPOSE OF THE AI

The Fair Housing regulations of January 1989 did not include guidelines concerning how to “affirmatively further fair housing.” Requirements with review criteria and the areas to be covered by the analysis of impediments to fair housing choice were included in the CDBG regulations published in September 6, 1988. It was not until the Fair Housing Planning Guide was published that affirmatively furthering fair

housing was defined. The HUD Fair Housing Planning Guide provides the following definitions and outlines the purpose of the AI.

According to HUD, impediments to fair housing choice are any actions, omissions, or decisions taken that restrict housing choice or the availability of housing or have that effect on one or more individual of a *protected class*.

The Guide states that the purposes of the AI are to:

- Serve as the substantive, logical basis for the fair housing planning;
- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts within a City and beyond.²

The AI involves:

- A review of the City's demographic, economic, and housing characteristics;
- A review of a City's laws, regulations, and policies, procedures and practices and how they affect the location, availability and accessibility of housing;
- Public education and outreach efforts, and a community fair housing survey;
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes; and
- Identifying any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to overcome the effects of any impediments identified in the AI.³

The Guide provides suggested data sources, methods to obtain citizen participation, suggested outlines, a format for fair housing planning, sample of corrective actions and measurable results, and suggestions for complying with fair housing requirements for persons with disabilities. HUD allows grantees to use existing available data. Data includes HUD and Federal agency databases and studies, State and local information sources, private housing industry reports, and college university/research, and data from the Consolidated Plan.

Public Participation in the AI

In accordance with the City's Citizen Participation Plan and requirements at 24 CFR 91.105(a)(2)(i), the City conducted an inclusive community participation process to get perspectives on fair housing experiences, perceptions, and opinions on the fair housing laws, practices, and services in the City and helped identify impediments. The following were used:

1. **Fair Housing Surveys** – Four online fair housing surveys targeted to residents, housing service providers/advocates, Realtors, and lending institutions were administered online and in person. The resident survey was provided in a Spanish language version.

² U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-8) March 1996

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-7) March 1996

2. **Print and Broadcast Media** – The City also promoted the AI requirements, the public meetings and focus groups, and the surveys on the City’s government television station, and a newspaper notice.
3. **Public meetings, Presentations and Focus Groups** – Meetings were held from May 19-21, 2014 to solicit input on fair housing from realtors, lenders, property managers, agencies serving the homeless, persons with disabilities, and faith based organizations.
4. **Key Person Interviews** – Interviews were conducted with City staff from other departments that related to fair housing issues such as Planning and Zoning, Public Relations, and City Attorney’s office. Interviews were also conducted with fair housing and housing related agencies such as the Goldsboro Housing Authority. The key person interviews were used to solicit feedback on fair housing issues in the City, the experience of agencies and organizations and data regarding housing discrimination.

PLANNING AND RESEARCH METHODOLOGY

The AI methodology used in conducting the AI was based on the *Fair Housing Planning Guide Vol. 1* (published by HUD’s Office of Fair Housing and Equal Opportunity in 1996); experience conducting AIs for other cities, and the City’s program goals. Revisions to fair housing strategies, easier access to data and improved ways of conducting the AIs has taken place since 1996. However, both HUD and program participants have recognized that the AFFH certification has not been as effective as it could be due to inconsistencies in conducting AIs and in implementing the requirements. As a result, HUD published the “Affirmatively Furthering Fair Housing” Proposed Rule in July 2013. The intent of the rule as articulated in the Federal Register Notice is to “refine existing requirements with a fair housing assessment and planning process that will better aid HUD program participants fulfill this statutory obligation and address specific comments raised by the U.S. Government Accountability Office (GAO).”⁴ Although HUD released the Final Rule at the time of publication of the AI, much of the proposed new methodology, data sets, formats and instruments are still in development stage. As far as feasible, criteria and areas of focus identified in the Proposed Rule were used in the development of the AI.

The following approach was used to gather and analyze data and develop recommendations for the AI:

Task 1 - Community Data Review: Reviewed demographic, economic, employment and housing market information for the City from the Decennial 2000 and 2010 U.S. Census and the 2013 American Community Survey (ACS).

Task 2 - Regulatory Review: Researched and collected information regarding development regulations, planning and zoning codes, comprehensive plan housing element, building and design codes, housing policies and programs that affect housing choice. City staff completed a planning and zoning self-assessment questionnaire.

⁴ Government Printing Office, Federal Register, Volume 78, No. 139, Affirmatively Furthering Fair Housing. Proposed Rule, Published July 19, 2013,

<http://www.gpo.gov/fdsys/pkg/FR-2013-07-19/pdf/2013-16751.pdf> Retrieved April 10, 2015

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Task 3 - Compliance Data Review: Collected and analyzed available data regarding compliance with local, state and federal Fair Housing Laws, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act, and the Community Reinvestment Act (CRA). Fair housing complaints and testing data was reviewed.

Task 4 – Review of Previous Studies: A review of the 2008 AI update was done to determine the status of the 2008 recommendations, actions taken, resources invested, and if the impediments still existed.

Task 5 – Review of Inventory of Affordable, Accessible Housing: Prepared an inventory of affordable and accessible housing including location to determine the incidence of racial, ethnic, and income concentration patterns in housing.

Task 6 - Internet Surveys, Direct Surveys, and Personal Interviews: Analyzed data from surveys completed by lenders, realtors, housing providers, and the public.

Task 7 - Identification and Analysis of Impediments: The findings were analyzed to determine the existence of impediments to fair housing choice in the City.

Task 8 – Recommendations and Action Planning: A list of recommendations to address the impediments and proposed timeline was developed. The Fair Housing planning process will begin upon completion of the AI.

Data Limitations

The data gathered for the AI has limitations that affect conclusions reached. It is assumed by the preparers of the AI that all of the data used from official sources, regardless of source, are accurate. All data is not consistent in the level of information provided. For example, more current data sources such as ACS data may not have as many data sets to analyze as the Bicentennial Census. The AI is a point in time study intended to analyze the current fair housing environment within the City of Goldsboro and some of the identified impediment may need additional research.

Maps used in the AI represent data by census tracts with an overlay of the City boundaries. Census tract and block group boundaries do not match exactly and in some cases, census tracts are shared by adjacent municipalities. In addition, census boundaries between the 2000 and 2010 Census periods may have changed. For the surveys, respondents were asked to respond based on personal knowledge, perceptions, and experience. As such responses may be influenced by the respondents' perception and awareness of housing discrimination, fair housing, neighborhoods, and an understanding of terms. However, the sample size of respondents is sufficiently large and diverse and the experiences significant enough to extrapolate on fair housing experiences within the City. Studies from other parts of the country may be used to support potential effects noted in the City but more research may be needed to verify conditions within the City.

LEGAL FRAMEWORK

Definition of Terms

Protected Classes

The protected classes in Goldsboro are as follows based on the FHA, the State of North Carolina and City ordinances:

<u>Protected under both federal and state law</u>	<u>Protected under North Carolina Law</u>	<u>Protected under federal, state and local law</u>
• Color	• Color	• Color
• Race	• Race	• Race
• Sex	• Sex	• Sex
• Religion	• Religion	• Religion
• National Origin	• National Origin	• National Origin
• Disability	• Disability	• Disability
• Familial Status	• Familial Status	• Familial Status

Affordable Housing

Throughout this document, there will be references and data on “affordable housing.” Affordable housing is defined as the availability of housing for persons at a rate they can afford usually measured in terms of the percentage of their income that one pays to rent or own housing. Fair housing is not synonymous with affordable housing and lack of affordable housing in and of itself is not an impediment to fair housing choice but affects it. HUD does not require that communities assist in the construction of affordable housing but has taken the position that the inclusion of “affordable” housing and promotion of a community as a “diverse community” are steps that communities can take to “affirmatively further fair housing.” Protected classes are often over represented in the low- and moderate-income categories and often likely to need “affordable” housing. However, the AI is required to address the geographic location of affordable housing and avoid segregation through the concentration of affordable housing in largely minority areas. The AI should also address the barriers experienced by members of the FHA protected classes in securing housing, one of which is affordability. The Court confirmed the above understanding in its summary judgment decision in the *Westchester County* case:

“The HUD Guide explains that while it is often the case that minorities are disproportionately represented among the low-income population, simply providing affordable housing for the low-income population is not in and of itself sufficient to affirmatively further fair housing. This unsurprising statement is grounded in the statutory and regulatory framework behind the obligation to AFFH, which, as already discussed, is concerned with addressing whether there are independent barriers to protected classes exercising fair housing choice. As a matter of logic, providing more affordable housing for a low income racial minority will improve its housing stock but may do little to change any pattern of discrimination or segregation. Addressing that pattern would at a minimum necessitate an analysis of where the additional housing is placed.”

U.S. ex rel. Anti-Discrimination Center v. Westchester County, 2009 WL 455269

(S.D.N.Y. Feb. 24, 2009), at *15.

Discriminatory Effect

Another concept that is used to assess impediments to fair housing in this study is “discriminatory effect.” Subpart G 100.500 (a) of the February 15, 2013 fair housing regulations define discriminatory effect as follows: a practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of persons or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.

HUD explains that the February 15, 2013 Fair Housing Act's Discriminatory Standard Rule formalizes the longstanding interpretation of the Fair Housing Act to include discriminatory effects liability and establishes a uniform standard of liability for facially neutral practices that have a discriminatory effect. It adds that under this rule liability is determined by a "burden-shifting" approach. The charging party or plaintiff in an adjudication first must bear the burden of proving its prima facie case of either disparate impact or perpetuation of segregation, after which the burden shift to the defendant or respondent to prove that the challenged practice is necessary to achieve one or more of the defendant's or respondent's substantial, legitimate, nondiscriminatory interests. If the defendant or respondent satisfies its burden, the charging party or plaintiff may still establish liability by demonstrating that this substantial legitimate, nondiscriminatory interest could be served by a practice that has a less discriminatory effect.

Subpart B Section 100.70 (d) adds subsection (5) as other prohibited conduct under discriminatory housing practices – enacting or implementing land-use rules, ordinances, policies, or procedures that restrict or deny housing opportunities or otherwise make unavailable or deny dwelling to persons because of race, color, religion, sex handicap, familial status, or national origin. The recent ruling on Disparate Impact will lend support to considering the impact of discriminatory effect.

SUMMARY OF RELEVANT FEDERAL, STATE, AND LOCAL LAWS

Fair Housing Act (42 U.S.C. § 3601, et. seq.), as amended: Title VIII of the Civil Rights Act of 1968 (Fair Housing Act): prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

Title VI of the Civil Rights Act of 1964: Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973: Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974: Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990: Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and referrals.

Architectural Barriers Act of 1968: The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975: The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Executive Order 11063: Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 12892: Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898: Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166: Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217: Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

The Home Mortgage Disclosure Act (HMDA) requires certain lenders to make information available on the number and types of lending applications received and whether the applications were accepted. The information is broken down by census tract, sex, race and income.

The Community Reinvestment Act (CRA) requires financial institutions to meet the credit needs of their communities, with a particular focus on low-and moderate-income residents and areas, consistent with safe and sound operations. The requirements of the Act allow governments and advocacy groups to raise questions about the adequacy of a lending institution's regulatory compliance, thus creating an incentive for institutions to be responsive to the needs of their communities.

State Legislation

North Carolina General Statutes Chapter 41A (State Fair Housing Act) 1983: The purpose of the Chapter is to provide fair housing throughout the State of North Carolina. Chapter 41A is similar to the federal Fair Housing Act and has not added any new protected classes. The North Carolina Human Relations Commission is the State Department that is responsible for fair housing compliance for the state. At the time of completion of the AI, on June 18, 2015, the North Carolina Senate in its proposed budget included provisions to repeal the State Fair Housing Act and eliminate the North Carolina Human Relations Commission. The House Budget bill did not include the fair housing repeal provisions. As such, a conference committee will be appointed to reconcile the differences.

LOCAL LEGISLATION

The City of Goldsboro implements the provisions of the FHA and the State Fair Housing Act (North Carolina) as it relates to housing discrimination but also has its own specific fair housing ordinance: Fair Housing Resolution No. 1977-169. Title II, Chapter 32 of the City's Charter identifies the Commission of Community Affairs as the advisory body to the City Council that "studies problems of discrimination as they are brought to the Commission's attention; and to encourage fair treatment and mutual understanding among all social and ethnic groups within the City." The Community Affairs Department and Human Relations Commission of the City is listed on the State of North Carolina Human Relations Commission as the local contact for fair housing complaints. See link: <http://www.doa.nc.gov/hrc/regions.aspx?region=5>.

II. REVIEW OF PAST FAIR HOUSING PLANS

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

In July 2008, the City prepared its last AI which guides the fair housing activities and the City's certification to affirmatively furthering fair housing as required by HUD. In addition, the Community Development Department included an Affirmatively Furthering Fair Housing (AFFH) Assessment for FY

2010-2011, FY 2011-2012, and FY 2013- 2014 in its Consolidated Annual Performance and Evaluation Reports (CAPER). Included were impediments and recommendations.

A. 2008 AI PREVIOUS IMPEDIMENTS AND RECOMMENDED ACTIONS

The main findings of the AI report and related actions are summarized below. The report did not find any “easily detectable” impediments in land use regulations and building codes nor any fair housing complaints within the City of Goldsboro.

Impediments

1. Based on HMDA data for 2005, disparity and inequity in obtaining mortgage financing is an impediment to fair housing choice for minorities and women in Goldsboro. The data showed that single-family home loan denial rates for minorities disproportionately increase as income increases and women receive a disproportionate number of subprime loans.
2. The increased need for housing with amenities for the physically disabled and outreach and education is an impediment.
3. Realtors are aware of fair housing laws and are not receiving any fair housing complaints but are also not proactively participating in fair housing activities or conducting actions to further fair housing initiatives.

Recommendations

The report listed only one recommendation as follows:

“The major recommendation is that the City of Goldsboro aggressively pursue a “Fair Housing Action Plan” which should contain specific strategies for addressing the impediments identified in this study.”⁵ An outline for a Fair Housing Action Plan was provided.

B. AFFH ASSESSMENT PREVIOUS IMPEDIMENTS AND RECOMMENDED ACTIONS -FY 2010-2011 CAPER

The main findings listed in the CAPER and recommendations are summarized below. It must be noted here that affordability of housing is not an impediment as an end in itself but is related to the fact that members of the protected classes such as minorities, family with children, and persons with disabilities show a higher percentage of low- and moderate-income persons.

Impediments

1. **Affordability.** Members of minority groups and persons with disabilities have overall lower incomes. Affording a home, whether rental or owned, is a barrier to their housing choice. Further, there is an identified need for new affordable single family homes for sale to first time homebuyers.
2. **Fair housing awareness.** There is an ongoing need to educate protected class persons about how to file complaints when discrimination happens. Awareness for property owners, landlords,

⁵ City of Goldsboro Analysis of Impediments to Fair Housing Choice, July 2008, page 53

builders, and lenders also needs to be addressed. There is a lack of knowledge about Fair Housing requirements and processes including for persons with Limited English Proficiency.

3. **Housing Unit Sizes.** In the rental market, there are not enough three and more bedroom units for families. For persons with disabilities, there are not enough accessible and affordable units.
4. **Education.** Persons wishing to buy a home often have difficulty with the process of buying a home due to lack of education.
5. **Accessibility.** For persons with disabilities, there is difficulty in actually entering a home that may be purchased.
6. **Credit Counseling.** African-American mortgage applicants are 3 3.5 times more likely than white applicants in being denied a mortgage loan due to poor credit histories or debt to income ratios.

Recommendations

- Distribute educational materials to landlords, banks and real estate offices to educate them on fair housing laws.
- Conduct fair housing workshops in partnership with churches, agencies, and sororities
- Refer low and moderate income residents to affordable rental housing and provide educational workshops.
- Review local newspapers, special magazines and monitor ads that may indicate any language or element of discrimination.
- Make information available to Spanish speaking persons via available media

C. AFFH ASSESSMENT PREVIOUS IMPEDIMENTS AND RECOMMENDED ACTIONS - FY 2011-2014 CAPER

Impediments

- Lack of Fair Housing Awareness and Education
- Low Inventory of Housing for the Disabled and Other Special Populations
- Affordability of housing for members of the FHA protected classes
- Mortgage Financing and Disproportionate Number of Subprime Loans for Minority and Women
- Accessibility of housing for persons with disabilities

Recommendations

- Increase education of Fair Housing laws
- Increase availability of housing for the disabled and other special populations
- Increase availability of housing for the disabled and other special populations
- Increase availability of mortgage financing for Minority and Women
- Increase the accessible housing units for persons with disabilities in rental and homeownership

D. CITY ACTIONS TO ADDRESS IMPEDIMENTS

The Community Development Department completed a “Status of Previous Impediments” matrix which provided an update of actions taken by the City to address the identified impediments, the entities that carried out the actions, the year completed, and the amount of funding invested in fair housing and related activities. A summary of the City’s report is provided below.

Based on a review of the City’s CAPERS for FY 201-11, FY 2011-2012, and FY 2013-2014, the Community Development Department of the City of Goldsboro completed the following activities:

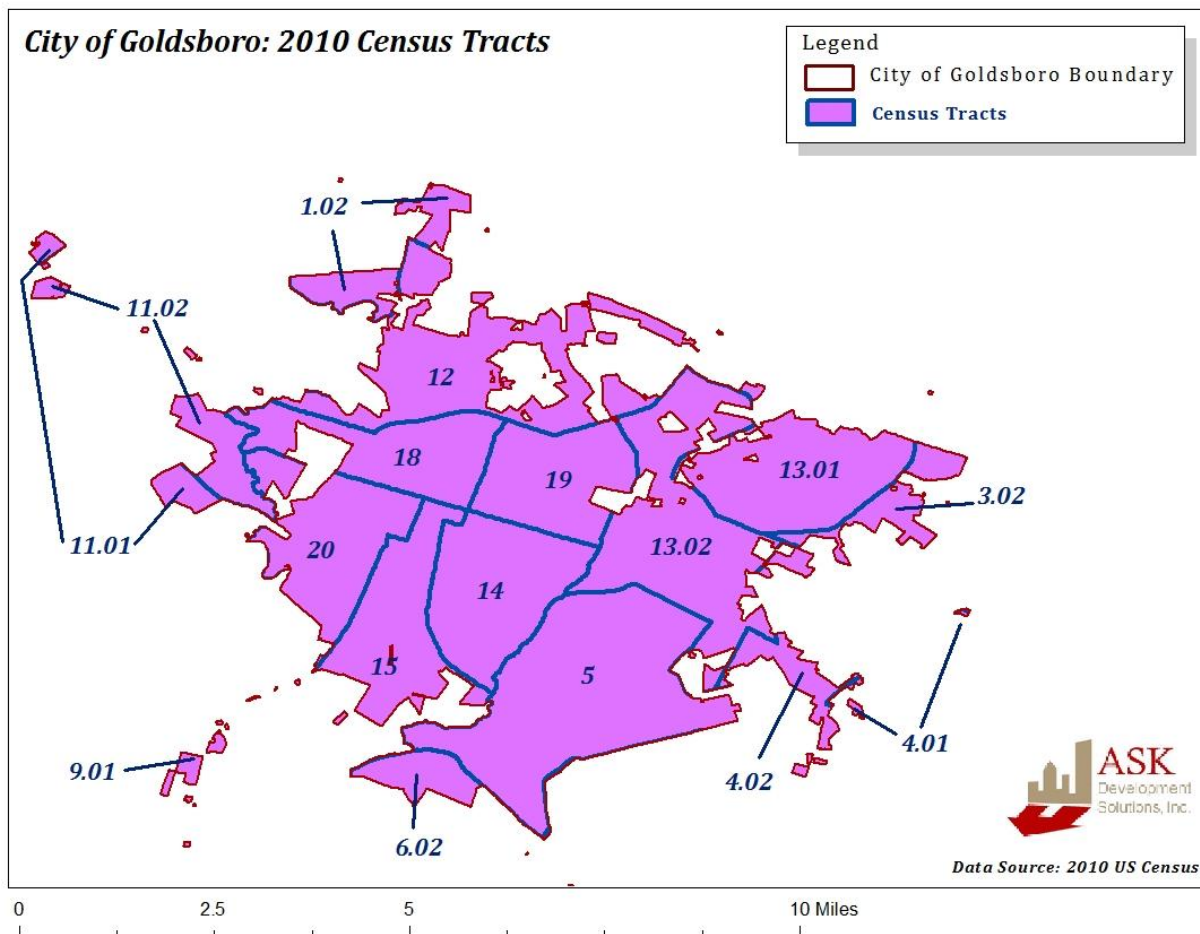
- Established the City’s Comprehensive Fair Housing Strategy which goal was to eliminate discrimination and unfair treatment in the provision of sale and rental housing in Goldsboro.
- Established an Affirmative Marketing Policy that reflected the City’s commitment to nondiscrimination and equal opportunity in housing. The Policy established procedures to affirmatively market units that are rental, rehabilitated, development projects and/or housing containing five or more assisted units using CDBG or HOME. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968, Executive Order 11063, the State Fair Housing Act (General Statutes of North Carolina, Chapter 41A, and the City of Goldsboro’s local Fair Housing Resolution No. 1977-169.
- Informed the public, potential tenants, owners, and investors about Federal Fair Housing Laws and Affirmative Marketing Policies using a fair housing conference during fair Housing Month, public notices, and radio ads, displaying the Fair Housing logo.
- Worked with the Goldsboro Housing Authority and the Eastern Carolina Regional Housing Authority in informing low-to-moderate income families of available housing offered by the City.
- Required for investor/owners to inform the general renter public about available rehabilitated or newly constructed units.
- Special outreach to the racial/ethnic groups who would not likely apply for housing without.
- The City invested \$2,163 in fair housing activities and over \$445,754 in affordable housing developments over the past three years. However, the City did not complete several of the proposed activities which have been incorporated in this AI as part of the recommendations.
- The Community Affairs and Community Development staff provided ongoing support to the Resident Council in two of the Goldsboro Housing Authority residents councils.

III. COMMUNITY BACKGROUND DATA

The 2010 U.S. Census represents the most recent data from the U.S. Census, and that data is used for this report when possible and available. Some areas of data-gathering, however, requires use of the American Community Survey (ACS) which provides most informational items as the decennial Census, but not always at the lowest geographic levels. The ACS is an ongoing statistical survey that is annually conducted by the United States Census Bureau. The survey gathers information previously contained only in the long form of the decennial census.

The 2010 Census, 2013 American Community Survey 5-year estimate, in addition to a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; Community Reinvestment Act (CRA) reports; official City of Goldsboro planning and reporting documents, and direct communication with local agencies. Overall, the data paint a revealing and fair portrait of the community and housing conditions therein. Map 1 shows the City of Goldsboro census tract boundaries based on the 2010 Census.

Map 1. 2010 Census Tracts – Goldsboro, NC

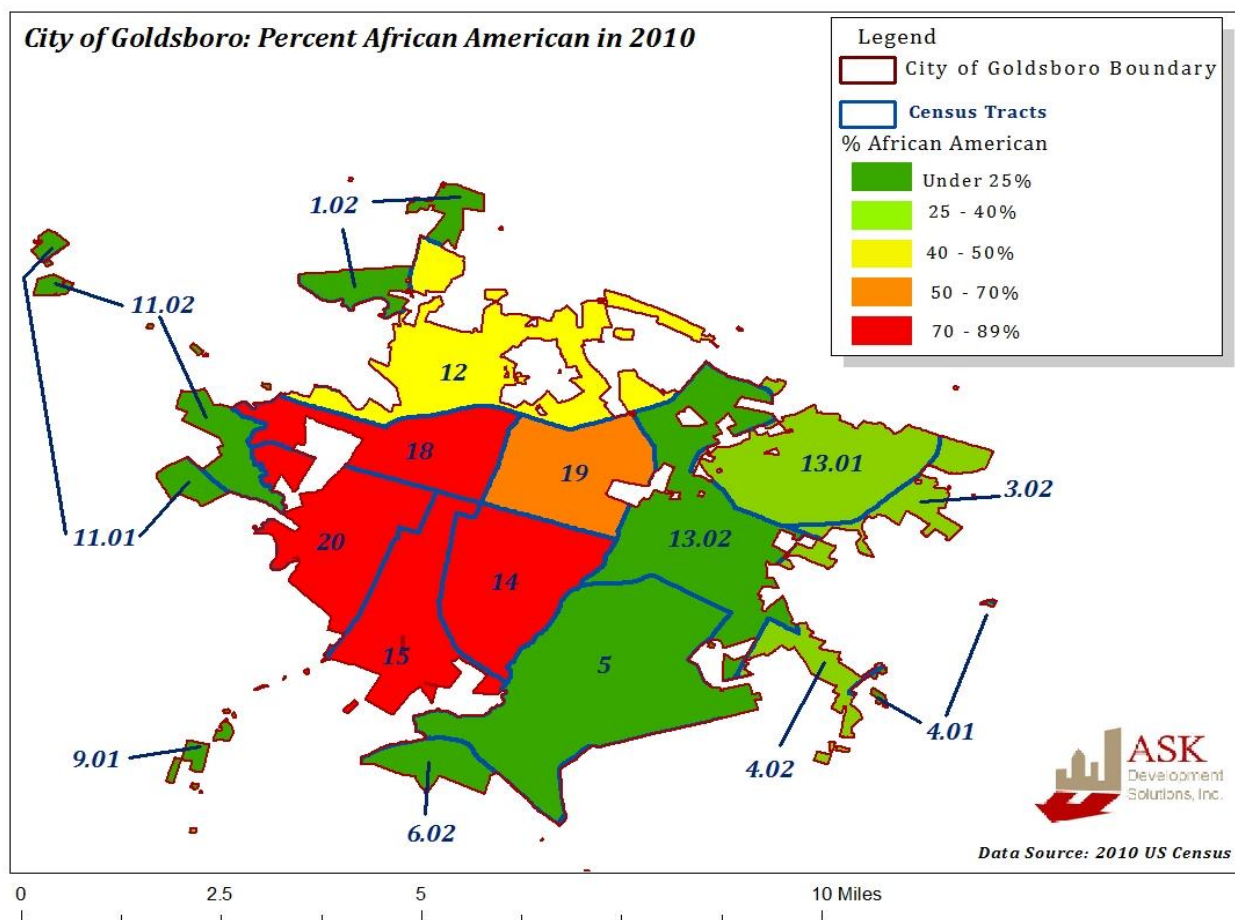


POPULATION, RACE, AND ETHNICITY

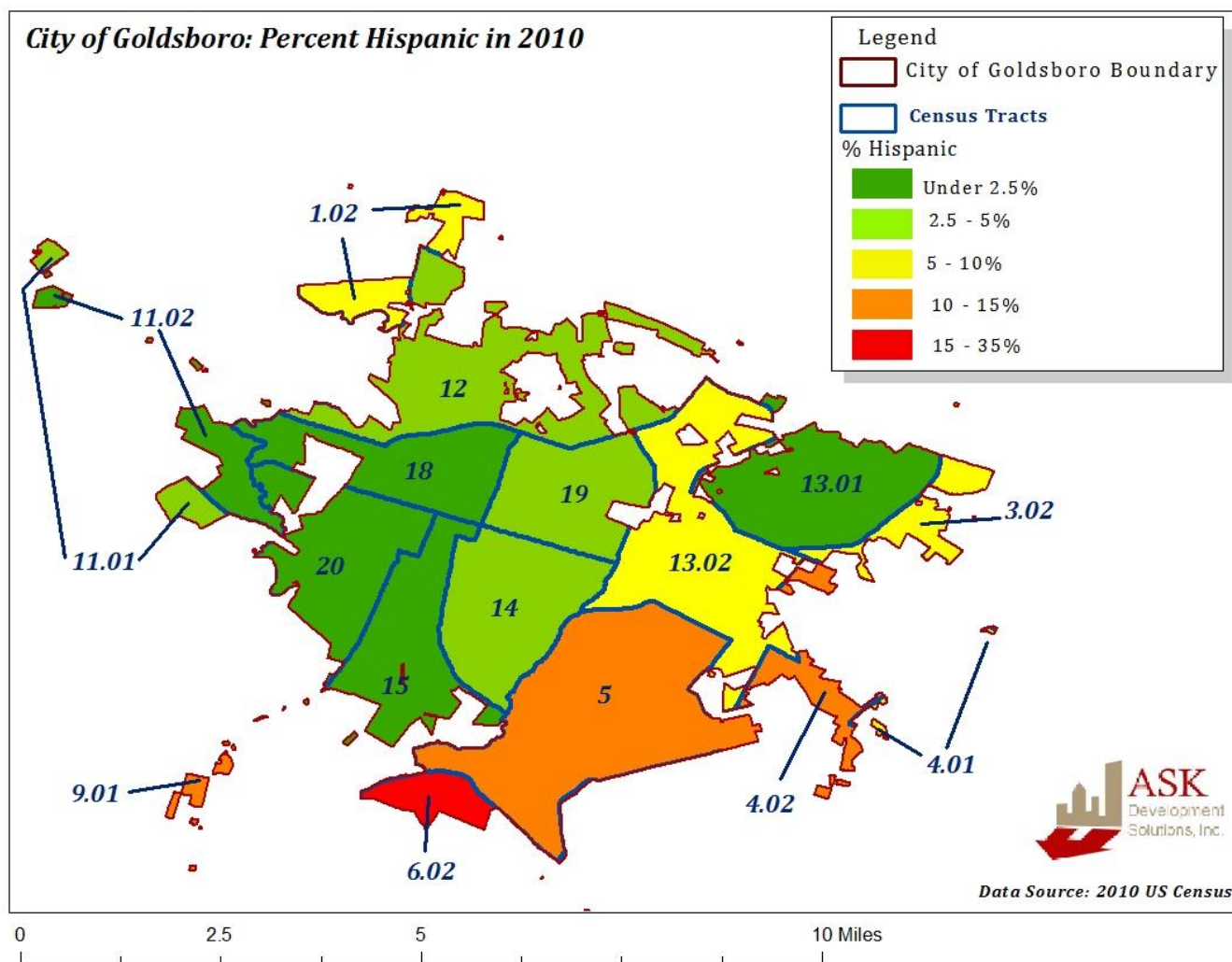
The City of Goldsboro had a total population of 36,437 persons at the time of the 2010 Census. The 2000 Census reflects a population of 39,043. Goldsboro had a population decrease over the ten year period of 2,606 persons from 2000 to 2010. According to the 2010 Census, the racial makeup of the community was a majority Black or African American (54.3%), but also included populations identifying themselves as White (39.2%), American Indian and Alaska Native (0.4%), Asian (1.8%), Native Hawaiian and other Pacific Islander (0.1%) and other races, including two or more (2.6%). Approximately 4% of the Goldsboro population identified themselves as being of Latino or Hispanic ethnic origin. See Table 1 below.

From the 2000 to 2010 Census counts, the Goldsboro Black or African American population decreased by 3.0%; Asian population increased by 15.8%; American Indian and Alaska Native population decreased by 20.8%; Native Hawaiian and other Pacific Islander population decreased by 23.3%, the White population decreased by 14.9%, and Hispanic or Latino Ethnic Origin population grew by the largest overall percentage at 50.5%. Maps 2 and 3 show the distribution of Black or African Americans and persons of Hispanic ethnicity throughout the City. Black or African Americans have the highest population concentrations in census tracts 14, 15, 18, and 20. Map 3 shows that persons of Latino or Hispanic ethnicity have the highest population concentration in census tracts 6.02; 4.01; 4.02; 5; and 9.01.

Map 2. Percentage Black of African American – Goldsboro, NC



Map 3. Percent Hispanic – Goldsboro, NC



According to the 2013 ACS, 93.0% of the people living in Goldsboro were native residents of the United States. This is a decrease from the 2000 Census count of 97.6%. Approximately 62% of residents were living in the state in which they were born.

In 2013, 4.9% of the people living in Goldsboro were foreign born (defined by the ACS as those born outside of the United States). This represents a 1.9% increase since the 2000 Census count of 3.0%. Of the foreign born population, 37.1% were naturalized U.S. citizens, and 62.9% were not U.S. citizens. As noted in Table 2, the mix of male and female population did not change significantly between 2000 and 2010

Analysis of Impediments to Fair Housing Choice, FY 2015-2019

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Table 1. Population/Race/Ethnicity: 2000-2010 Census Changes – Goldsboro, NC

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 Change	% change 2000 to 2010
Total Population	39,043	100%	36,437	100%	-2,606	-6.7%
Black or African American	20,397	52.2%	19,786	54.3%	-611	-3.0%
Asian	562	1.4%	651	1.8%	89	15.8%
American Indian and Alaska Native	168	0.4%	133	0.4%	-35	-20.8%
Native Hawaiian and Other Pacific Islander	30	0.1%	23	0.1%	-7	-23.3%
White	16,803	43.0%	14,295	39.2%	-2,508	-14.9%
Two or More Races	639	1.6%	959	2.6%	320	50.1%
Hispanic or Latino Origin	1,052	2.7%	1,583	4.3%	531	50.5%

Source: 2000 and 2010 U.S. Census

These overall demographic shifts especially in the increases in persons of Hispanic or Latino origin could result in housing discrimination among those groups. As such the City should proactively increase its fair housing education and outreach to ensure that persons within these protected classes and all City residents are aware of rights and responsibilities under the federal and State's Fair Housing Acts.

Table 2. Gender: 2000 -2010 Census Changes – Goldsboro, NC

	2000 Population	% of Total 2000 Population	2010 Population	% of Total 2010 Population	2000 to 2010 Change	% change 2000 to 2010
Male	19,213	49.2%	17,654	48.5%	-1,559	-8.1%
Female	19,830	50.8%	18,783	51.5%	-1,047	-5.3%

Source: 2000 and 2010 U.S

HOUSEHOLD CHARACTERISTICS

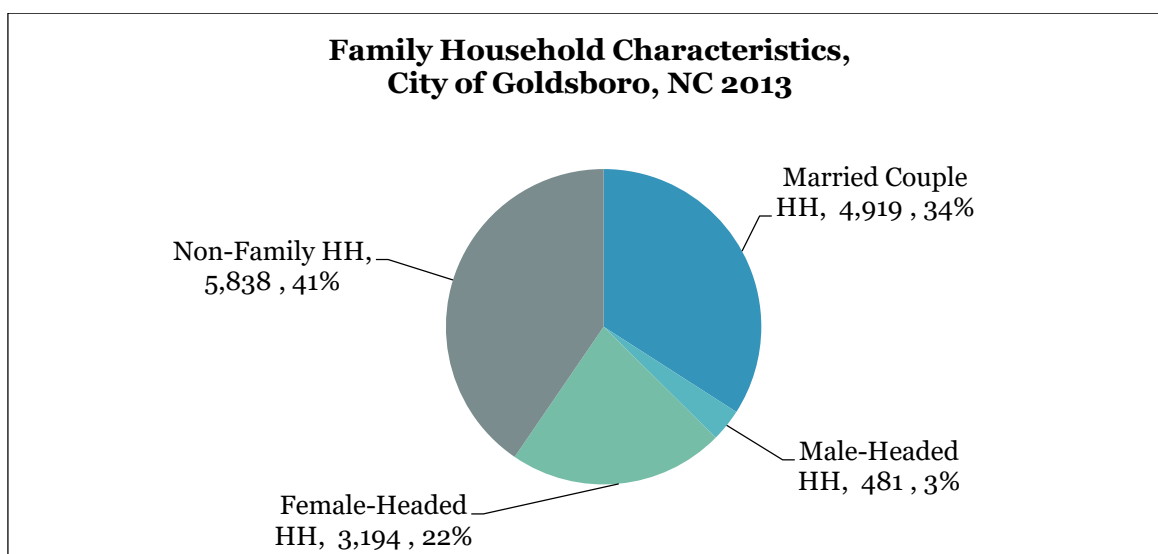
Since the 2000 Census, average household size in Goldsboro has decreased to 2.33 persons per household in 2013 down from 2.4 persons per household. According to the 2013 ACS, among the 14,432 Goldsboro households, family households represented 59.5% (8,594) of all households, including: 4,919 (34.1%) married couple family households; 481 (3.3%) male-headed households; and 3,194 (22.1%) female-headed households. Non-family households comprised a significant amount of the population at 40.5% (5,838) of all households. See Table 3 and Figure 1 below.

Table 3. Households by Type – Goldsboro, NC

Households	14,432	100.0%
Family households	8,594	59.5%
With own children under 18 years	3,900	27.0%
Married-couple family	4,919	34.1%
With own children under 18 years	1,735	12.0%
Female householder, no husband present, family	3,194	22.1%
With own children under 18 years	2,065	14.3%
Non-family households	5,838	40.5%

Source: U.S. Census Bureau, 2013 ACS

Figure 1. Household Characteristics – Goldsboro, NC



Source: U.S. Census Bureau, 2013 ACS

Among persons 15 and older, 37.2% of the population was married. The 2013 ACS provides the following information on marital status as shown in the table below.

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City of Goldsboro, NC

Table 4. Marital Status – Goldsboro, NC

Population 15 years and over	Persons	Percentage
Total	28,777	100.0%
Never married	10,152	35.3%
Now married, except separated	10,717	37.2%
Separated	1,758	6.1%
Widowed	2,385	8.3%
Divorced	3,738	13.0%

Source: U.S. Census Bureau, 2013 ACS

INCOME, EDUCATION, AND EMPLOYMENT

Income Characteristics

The City of Goldsboro is located in the Wayne County, North Carolina HUD Fair Market Rent (FMR) Area. HUD's 2013 Income Limits for the Wayne County, North Carolina HUD FMR Area defined Extremely Low (30%) Income Limits as those earning no more than \$16,050; Very Low Income (50%) Income Limits as those earning no more than \$26,750; and Low Income (80%) Income Limits as those earning no more than \$42,800. All figures are based on a household size of four and a 2013 Area Median Income of \$54,000 for Wayne County. Although income limits were available from HUD for more recent years, 2013 data was used for comparison with 2013 ACS data.

Table 5. Income Limits Summary – Wayne County, NC

FY 2013 Income Limit Category	1 Person HH	2 Person HH	3 Person HH	4 Person HH	5 Person HH	6 Person HH	7 Person HH	8 Person HH
Extremely Low (30%) Income Limits	\$11,250	\$12,850	\$14,450	\$16,050	\$17,350	\$18,650	\$19,950	\$21,200
Very Low (50%) Income Limits	\$18,750	\$21,400	\$24,100	\$26,750	\$28,900	\$31,050	\$33,200	\$35,350
Low (80%) Income Limits	\$30,000	\$34,250	\$38,550	\$42,800	\$46,250	\$49,650	\$53,100	\$56,500

Source: U.S. Department of Housing and Urban Development (HUD)

CHAS data provides information on households by income level. Based on the 2011 CHAS, there were 6,640 (44.7%) low- and moderate-income households in Goldsboro. See Table 6 below.

Table 6. Households by Income Level – Goldsboro, NC

Income Limit Category	# of Households	% of Households
0-30%	2,590	17.4%
31-50%	1,820	12.3%
51-80%	2,230	15.0%
81-100%	1,425	9.6%
>100%	6,785	45.7%
TOTAL	14,850	100.0%

Source: 2007-11 CHAS

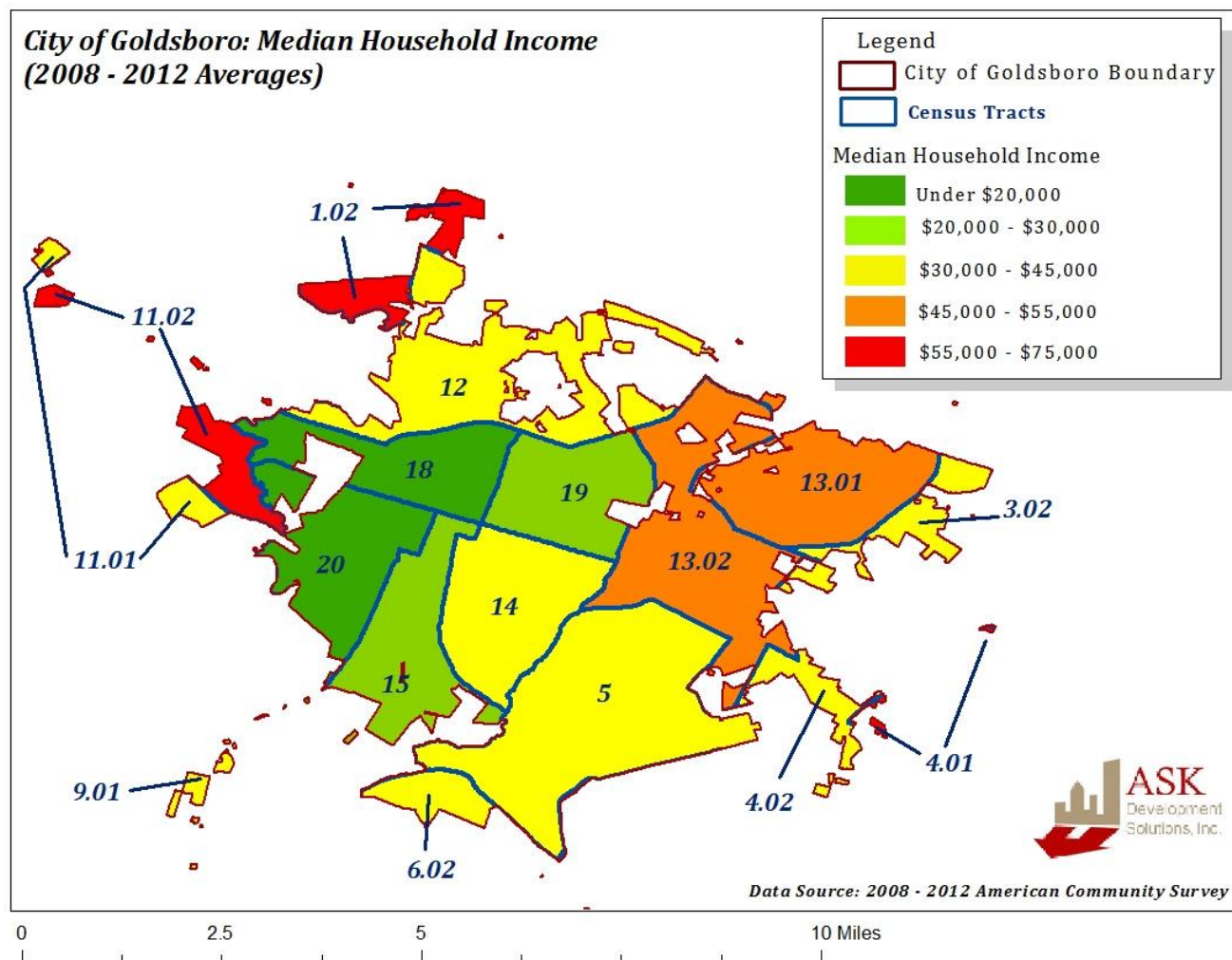
Within just the city limits of Goldsboro, however, there was a lower median household income of \$46,653 (2013 ACS). In 2000, the City of Goldsboro median household income was \$29,456 (2000 U.S. Census). The 2013 ACS further illustrates that of the total 14,432 households in Goldsboro, 37.3% earned less than \$25,000 annually, with another 29.5% earning between \$25,000 and \$50,000. For the middle and upper income brackets in 2013, 16.3% earned between \$50,000 and \$75,000; 8.0% earned between \$75,000 and \$100,000; and 8.9% earned \$100,000 and up. Map 4 shows that households with the highest median incomes (\$55,000-\$75,000) reside in census tracts 1.02 and 11.02. Conversely very low income households (under \$20,000) reside in census tracts 18 and 20.

Table 7. Household Income Levels – Goldsboro, NC

INCOME LEVEL	% OF HOUSEHOLDS
Less than \$10,000	14.5%
\$10,000 to \$14,999	8.1%
\$15,000 to \$24,999	14.7%
\$25,000 to \$34,999	13.7%
\$35,000 to \$49,999	15.8%
\$50,000 to \$74,999	16.3%
\$75,000 to \$99,999	8.0%
\$100,000 to \$149,99	5.3%
\$150,000 to \$199,999	2.4%
\$200,000 or more	1.2%

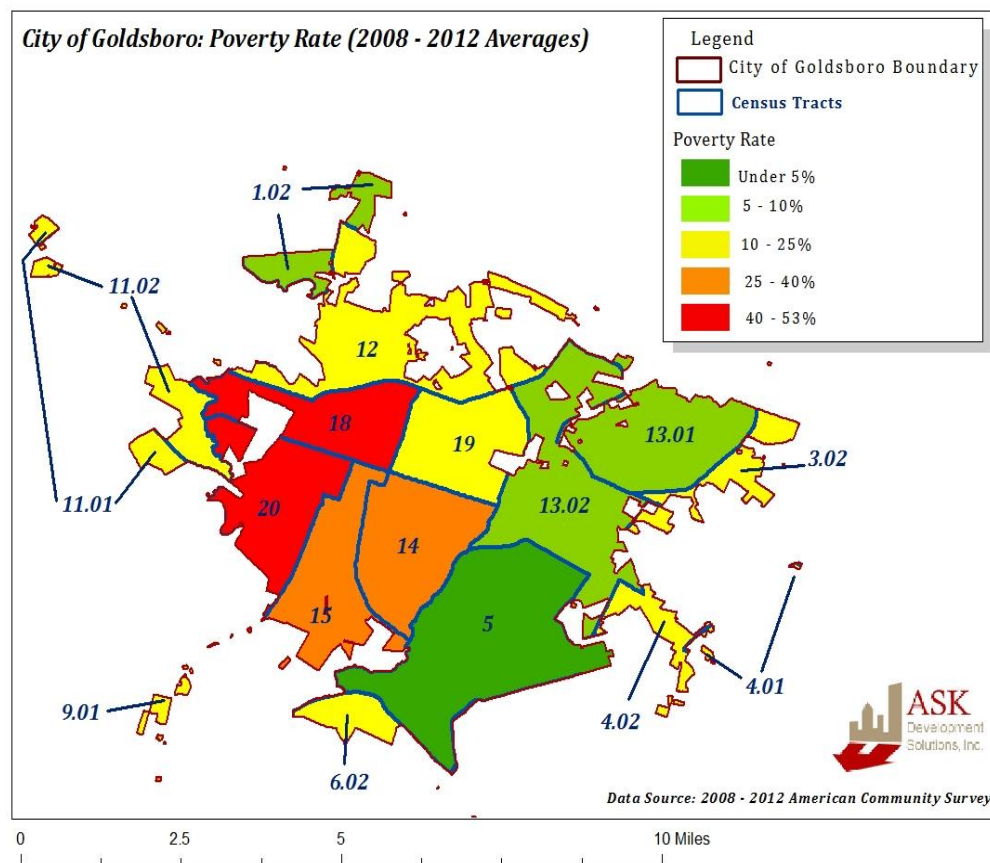
Source: U.S. Census Bureau, 2013 ACS

Map 4. Median Households Income – Goldsboro, NC



Per the 2013 ACS, 25.7% of the Goldsboro population subsists below the poverty level. This reflects an increase from 2000, when 19.2% of the population was below poverty level. In 2013, people ages 65 years and over had experienced an overall lower rate of poverty at 15.6%. Families also experienced an overall lower rate of poverty in 2013 at 21.0%, and married couple families had a significantly lower rate of living below poverty level at 7.9%. Female-headed households experienced poverty at the greatest rate of all groups: 41.8% of female households with no husband present; 51.2% of female households with related children less than 18 years old; and 64.2% of female households with related children less than 5 years old only. This measurement is particularly stark when compared to their incidence in the total population (female headed households with children make up 14.3% of all Goldsboro households). Map 5 demonstrates correlations with low- and moderate-income areas and areas of poverty.

Map 5. Poverty Rate – Goldsboro, NC



Of the 14,432 estimated Goldsboro households in 2013, approximately 33.5% received Social Security income; 10.0% received Supplemental Security Income; 2.3% received cash public assistance income; 22.1% received retirement income; and 24.9% received Food Stamp/SNAP benefits.

Table 8. People Living Below the Poverty Level – Goldsboro, NC

All People	25.7%
Under 18 Years	37.9%
Related Children Under 18 Years	37.3%
Related Children Under 5 Years	44.7%
Related Children 5 to 17 Years	33.4%
18 Years and Over	21.6%
18 to 64 Years	23.1%
65 Years and Over	15.6%
People in Families	23.6%
Unrelated Individuals 15 Years and Over	33.2%

Source: U.S. Census Bureau, 2013 ACS

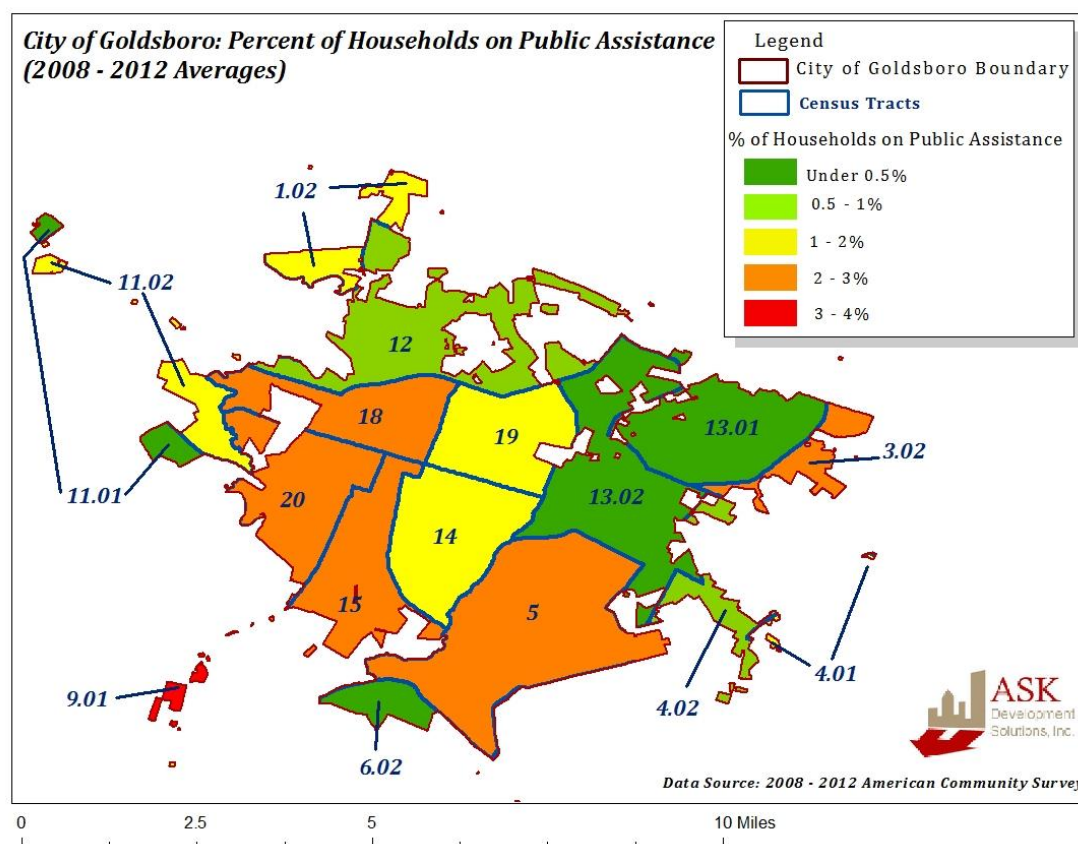
Table 9. Families Living Below the Poverty Level – Goldsboro, NC

All Families	21.0%
With Related Children Under 18 Years	33.7%
With Related Children Under 5 Years Only	38.6%
Married Couple Families	7.9%
With Related Children Under 18 Years	11.6%
With Related Children Under 5 Years Only	8.9%
Families With Female Householder, No Husband Present	41.8%
With Related Children Under 18 Years	51.2%
With Related Children Under 5 Years Only	64.2%

Source: U.S. Census Bureau, 2012 American Community Survey

Map 6 below shows the distribution of families receiving public assistance, Persons receiving financial assistance may receive benefits including food stamps from the Supplemental Nutrition Assistance Program (SNAP) and other forms of assistance such as rental assistance, free health care, and child care.

Map 6. Percentage of Households on Public Assistance – Goldsboro, NC

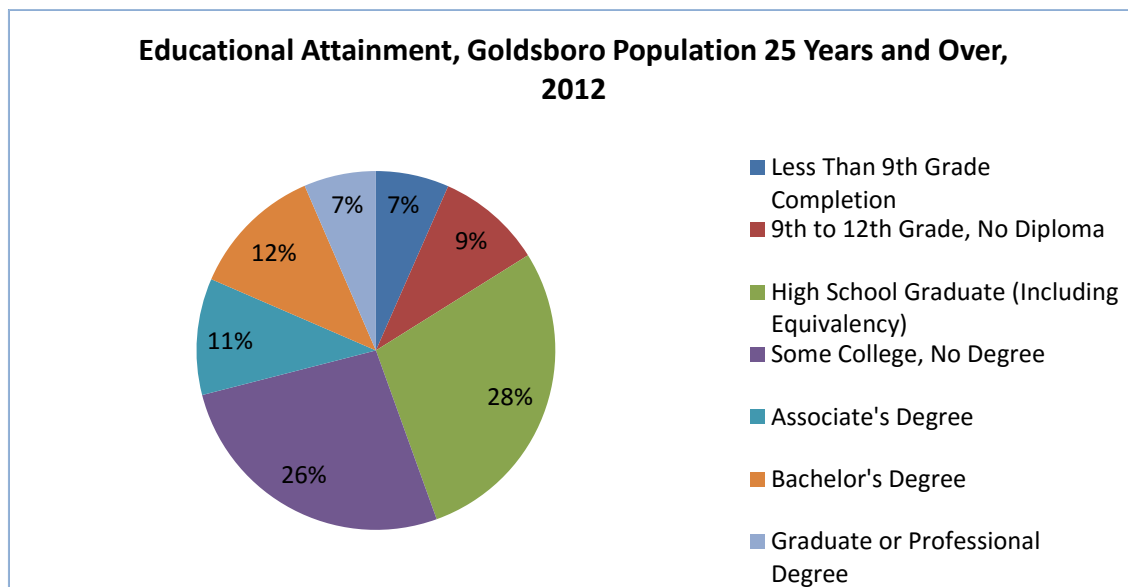


Educational Attainment

Within the Goldsboro population of persons 25 years and over (2013 ACS), 28.4% of people had at least graduated from high school (including equivalency), 12.0% had a bachelor's degree, and 6.5% had a graduate or professional degree. Of the same population (25 years and older), 16.1% had less than a high school education diploma.

The total school enrollment for the population aged 3 years and over in Goldsboro was 8,902 in 2013. School enrollment is broken down into the following categories: 6.0% in nursery school/preschool; 4.1% in kindergarten; 39.5% in elementary school (grades 1-8); 21.6% in high school; and 28.8% in college or graduate school.

Figure 2. Educational Attainment – Goldsboro, NC



Source: U.S. Census Bureau, 2013 ACS

Employment

As of 2013, the Goldsboro population aged 16 years and over numbered 28,368 persons, of which approximately 57.2% (16,226) were in the labor force and 41.4% (11,744) were employed. This reflects some change since 2000 when Goldsboro had 30,109 persons aged 16 and over. In 2000, 55.7% (16,771) of those persons were in the labor force and 42.6% (12,829) were employed. The figures below give a larger view of the labor force changes within Wayne County, North Carolina, from 1990 to present.

Analysis of Impediments to Fair Housing Choice, FY 2015-2019

City of Goldsboro, NC

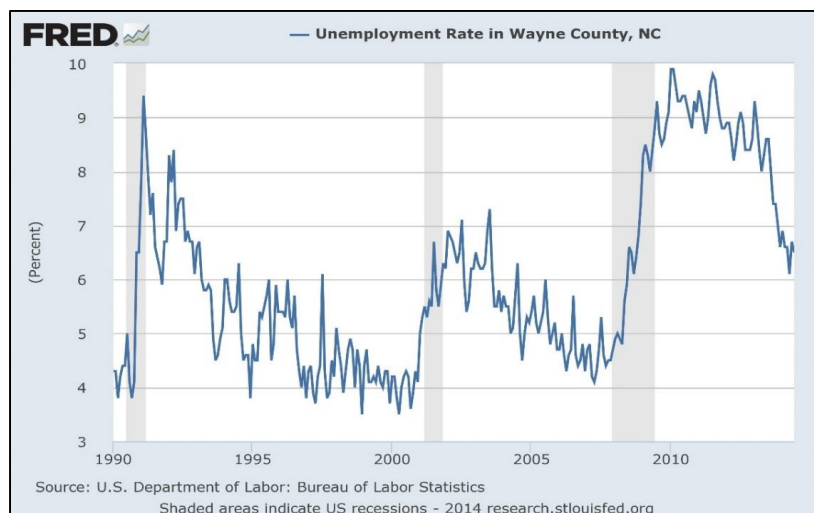
Figure 3. Civilian Labor Force: 1990-Present – Wayne County, NC



Source: Federal Reserve Bank of St. Louis, Missouri

The national economic downturn in recent years has affected the Goldsboro area, and unemployment in Goldsboro rose from 4.1% in April 2007 to 9.6% in March 2010. Further illustration of these regional trends can be found in the following figure.

Figure 4. Unemployment Rate: 1990-Present – Wayne County, NC



Source: Federal Reserve Bank of St. Louis, Missouri

The City of Goldsboro has job opportunities in a fairly diversified economy, and the character of its population is reflected in the major industries of employment. According to the 2013 American Community Survey, the five top industries provide employment for 74% of the City's civilian workforce:

Educational services, Healthcare, and Social Assistance ----- 3,167 (27.0%)
Manufacturing -----1,811 (15.4%)

Public Administration -----1,392 (11.9%)
 Retail Trade -----1,209 (10.3%)
 Arts, entertainment, and recreation, and accommodation
 and food services -----1,102 (9.4%)

According to Forbes Magazine, Goldsboro is best known as the home of the Seymour Johnson Air Force Base. The city is also occupied by the high education institutions of Wayne Community College and North Carolina Wesleyan College, Goldsboro campus. Wayne Memorial Hospital, a medical facility located in Goldsboro, is the county's second largest employer. The following table lists the major employers within Goldsboro, and those within close proximity of the Goldsboro city limits.

Table 10. Wayne County Top Employers (2013)

Company Name	Employment Total	Industry
Wayne County Board of Education	1000+	Education & Health Services
Wayne Memorial Hospital, Inc.	1000+	Education & Health Services
State of NC Dept. of Health & Human	1000+	Public Administration
Wal-Mart Associates, Inc.	1000+	Trade, Transportation & Utilities
County of Wayne	500-999	Public Administration
Case Farms Processing, Inc.	500-999	Natural Resources & Mining
Department of Defense	500-999	Public Administration
Mount Olive Pickle Co, Inc.	500-999	Manufacturing
Cooper Standard Automotive NC LLC	500-999	Manufacturing
Wayne Community College	500-999	Education & Health Services
Pate Dawson Co, Inc.	500-999	Trade, Transportation & Utilities
Georgia-Pacific LLC	500-999	Manufacturing
City of Goldsboro	250-499	Public Administration
Dept. of Public Safety	250-499	Public Administration
Dixon Food Group, Inc.	250-499	Leisure & Hospitality
Food Lion	250-499	Trade, Transportation & Utilities
Butterball LLC	250-499	Manufacturing
Waukesha Electric Power Systems	250-499	Manufacturing
The Mega Force Staffing Group, Inc.	250-499	Professional & Business Services
Mount Olive College, Inc.	250-499	Education & Health Services
AAR Manufacturing, Inc.	250-499	Manufacturing
Uchiyama America Incorporated	250-499	Manufacturing
Franklin Baking Company LLC	250-499	Manufacturing
Goerlichs, Inc.	250-499	Manufacturing
AT&T Services, Inc.	250-499	Information

Source: North Carolina Department of Commerce

The Wayne County Development Alliance also compiles a list of the County's top 10 employers. As of January 2014, the list includes the following companies that were not identified in the table above, Seymour Johnson Air Force Base (6,730 employees), Wayne County Public Schools (3,046 employees), Cherry Hospital (956 employees), O'Berry Hospital (859 employees), and Goldsboro Milling Company (800 employees).

TRANSPORTATION AND COMMUTING

Transportation

Public transportation services in the City of Goldsboro are provided by the Goldsboro Area Transportation Express of Wayne County (GATEWAY). GATEWAY provides fixed-route service and Demand-Response Service which includes commuter and paratransit services, in the City of Goldsboro and Wayne County. Funding for GATEWAY is provided by the City of Goldsboro, Wayne County, North Carolina Department of Transportation (NCDOT), and the Federal Transit Administration (FTA).

The fixed-route service is comprised of four routes which originate from the intersection at North Madison Avenue and Beech Street. The four routes are Wayne Memorial Route (north), South end Route (south), North End Route (east), and Berkeley Mall Route (west). The routes operate on weekdays between 5:30 a.m. to 6:30 p.m. and on Saturdays and Holidays from 9:30 a.m. to 6:30 p.m. The fare structure is as follows:

- One-way transit fare is \$1.00
- Reduced one-way transit fare of \$0.50 is available to seniors (over 60 years), persons with disabilities, and Medicare or Medicaid cardholders.
- Children under 42 inches ride free with a paying adult
- 22-Ride Tickets – \$20.00 for full-fare, \$10.00 for reduced fare
- All-Day Tickets - \$2.00 for full fare, \$1.00 for reduced fare
- Transfers – Free, but are only valid at the Transfer Center and for the next available bus
- The one-way fare for the Dudley/Mt. Olive route is \$2.00 and includes a free transfer to one of the fixed-route buses within Goldsboro

According to GATEWAY's website, there are specially equipped lift vans available for individuals in wheelchairs or those who have mobility problems. The vans travel throughout Goldsboro and the Wayne County area and provide transportation to medical appointments in areas such as UNC in Chapel Hill, Duke in Durham, Wake-Med in Raleigh, and Pitt Memorial in Greenville.

Rural General Public Transportation (RGPT) is available to and from locations within Wayne County. The fare for each destination is \$8.00 per person. Dial-A-Ride is available within the city limits of Goldsboro for \$5.00 per person and per destination. ADA transportation is available to qualified dis-abled residents of Goldsboro that live within 3/4 mile of our fixed route buses and are going to a destination that is also within 3/4 mile of these fixed route buses. Fares are \$2.00 per ADA passenger. Demand-response services must be reserved at least 48 hours in advance.

According to the 2035 Goldsboro Urban Area Long Range Transportation Plan, a public questionnaire utilized during the development of the plan identified public transportation as the second priority following the construction or widening of highways in terms of funding for transportation. Actions most likely to increase transit use according to the questionnaire included implementing commuter rail, extending bus routes into the county, and providing quality route information. The City's 2010-2014

Consolidated Plan, identified public transportation as a priority need for homeless persons and their families. Recommendations included extending the hours of operation as well as broadening the services. Transportation was also identified as a need for persons with disabilities and for persons with HIV/AIDS.

According to the GATEWAY Transportation Service Plan, the cost to operate the transit services in FY 2008-09 was in excess of \$2 million. Funding for continued operations including recommended transit improvements identified in the plan will require substantial increase in the local funds contributed.

These factors provide the basis to identify transportation as an impediment. Generally, public transportation is used by lower income persons, persons who are elderly, and persons with disabilities; thus these are the groups disproportionately impacted by insufficient public transportation. In addition to the lack of transportation options, the siting of public transportation may also impact fair housing choice.

According to Envision 35, the City's Comprehensive Plan, there are two railroad lines that serve the Goldsboro Urbanized Area owned and operated by Norfolk Southern Railroad and CSX. There was discussion about expanding the passenger rail operation to possibly extend service beyond Raleigh and Kinston and into Fayetteville and Wilmington. The expansion of the service will provide a regional transportation option and public transportation for residents working in the Raleigh-Durham region.

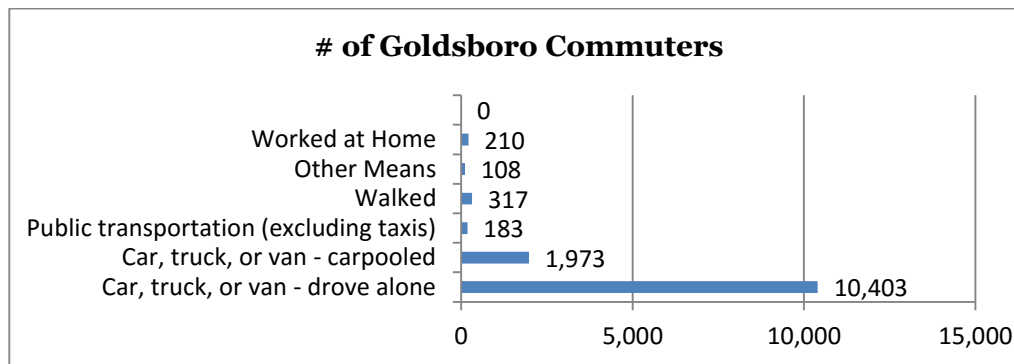
The failure to provide transportation or affordable housing in proximity to job centers is a barrier to low- and moderate-income people impacting their ability to secure employment. The lack of public transportation also affects where people are able to attend school, shop, and conduct their business. The areas where public transportation is not available, or does not connect residents with employment or their other needs makes the area inaccessible to those without means to have a personal vehicle.

The 2035 Goldsboro Urban Area Long Range Transportation Plan as well as the GATEWAY Transportation Service Plan (2010) supports Transit-Oriented Development (TOD) that includes higher density and mixed-use development around high-use bus stops and the rail station at Union Station. According to the former plan, there are several key destinations that are not currently ideal for transit but where access to public transportation should continue to be a priority. These include the mall, Seymour Johnson Air Force Base, YMCA, Wayne Memorial Hospital, and Wayne Community College.

Commuting

According to the 2013 ACS, 78.8% of Goldsboro workers drove to work alone and 15.0% carpoolled. Among those who commuted to work, it took them on average 18 minutes to get to work.

Figure 5. Modes of Transportation – Goldsboro, NC



Source: U.S. Census Bureau, 2013 ACS

Table 11. Commute Times to Work – Goldsboro, NC

Travel Time to Work (one way)	Rate (%)
Less than 10 minutes	28.2%
10 to 14 minutes	23.9%
15 to 19 minutes	18.6%
20 to 24 minutes	6.8%
25 to 29 minutes	3.3%
30 to 34 minutes	6.9%
35 to 44 minutes	4.3%
45 to 59 minutes	3.6%
60 or more minutes	4.4%

Source: U.S. Census Bureau, 2013 ACS

A review of the data above shows that over one-half of the commuters (52.1%) spent less than 15 minutes or more commuting one way to work. An additional 28.7% spent less than 30 minutes commuting one way to work. The largest group of commuters (28.2% of all commuters) spent less than 10 minutes commuting one way to work.

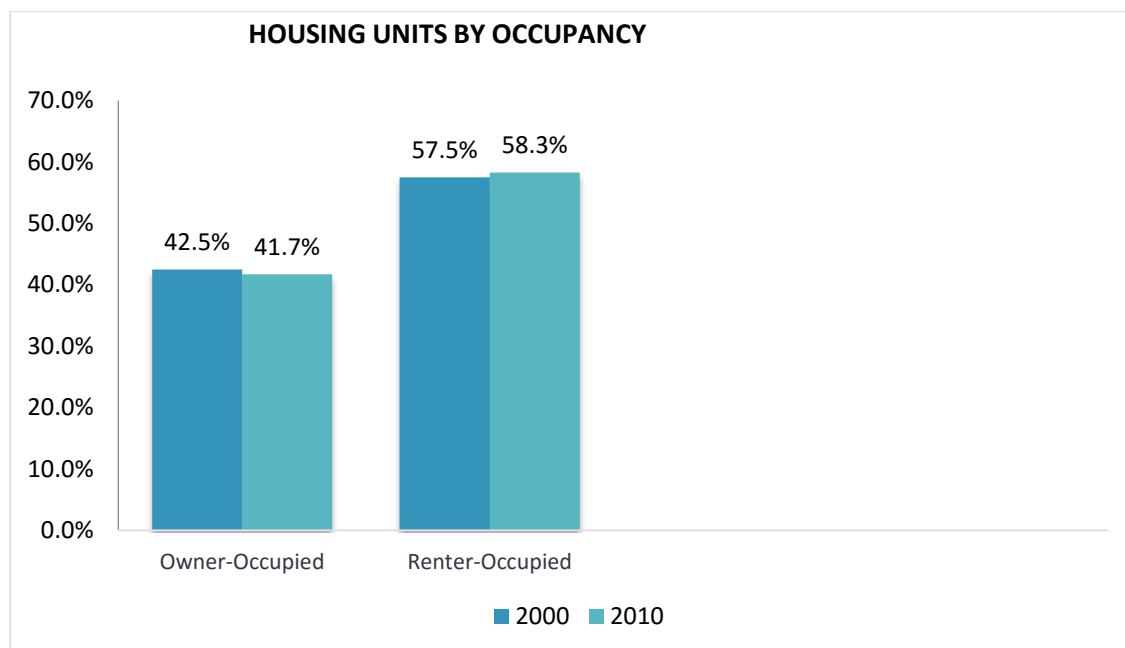
HOUSING PROFILE

Housing by Tenure

According to the U.S. Census, the number of housing units in Goldsboro grew by 2.8% from 16,372 in 2000 to 16,824 housing units in 2010. The rate of housing production was faster than the growth in the City's total population which decreased by 6.7% within the 10-year period. The City's vacancy rate rose from 10.6% (1,742 units) in 2000 to 11.0% (1,859 units) in 2010.

In 2010, the City of Goldsboro was comprised of 6,240 (41.7%) owner-occupied units and 8,725 (58.3%) renter-occupied units. This represents a slight decrease of 0.8% percentage points in the rate of homeownership and a corresponding increase in the number of renter-occupied units. Figure 6 shows the change in tenure between 2000 and 2010.

Figure 6. Housing Units by Occupancy – Goldsboro, NC



Source: 2000 and 2010 U.S. Census

Housing by Structure Type

The 2013 ACS reports 16,783 total housing units in Goldsboro. Table 12 gives a breakout of the types of units in the housing stock and Table 13 provides the year structures were built.

The predominant type of housing in Goldsboro is the single-family unit (60.0%), compared to multi-family units (40.0%). Mobile homes make up 5.5% of Goldsboro's housing stock. Single-unit, detached structures are the most prevalent housing type (53.4%), followed by duplexes (9.4%). Comparatively, the 2000 Census predominant housing type was also single-unit, detached structures (8,830 units or 53.7%), followed by single-unit, attached structures (1,873 units or 11.4%) and structure with 3 or 4 units (1,444 units or 8.8%).

Table 12. Type of Housing Units – Goldsboro, NC

UNITS IN STRUCTURE		
Type of Housing Unit	Number of Units	Percentage
1-unit, detached	8,959	53.4%
1-unit, attached	1,116	6.6%

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UNITS IN STRUCTURE		
2 units	1,580	9.4%
3 or 4 units	1,436	8.6%
5 to 9 units	1,562	9.3%
10 to 19 units	251	1.5%
20 or more units	955	5.7%
Mobile home	921	5.5%
Boat, RV, van, etc.	3	0.0%

Source: U.S. Census Bureau, 2013 ACS

The majority of the housing stock (78.0%) was built prior to 1980. Housing production peaked in the 1970s and each decade since then, the number of new units added to the housing stock has continuously decreased. According to the City's 2015-2019 Consolidated Plan, based on 2011 ACS data, there are 9,295 housing units that were built before 1980 and 1,194 (12.8%) had children present. These units are at risk for lead-based paint hazard.

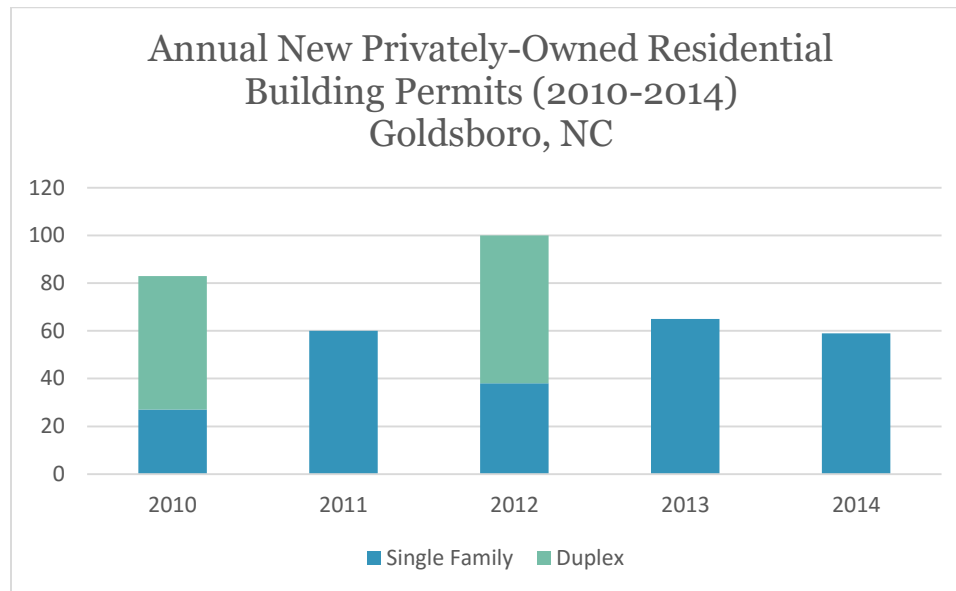
According to building permit activity available from the U.S. Census Building Permits Survey, between 2010 and 2014, 367 building permits were issued for 249 (67.8%) single family residential units and 118 (32.2%) duplexes as shown in Figure 7.

Table 13. Year Structure Built – Goldsboro, NC

YEAR STRUCTURE BUILT		
Built 2010 or later	102	0.6%
Built 2000 to 2009	1,917	11.4%
Built 1990 to 1999	1,662	9.9%
Built 1980 to 1989	2,162	12.9%
Built 1970 to 1979	3,094	18.4%
Built 1960 to 1969	2,838	16.9%
Built 1950 to 1959	2,973	17.7%
Built 1940 to 1949	790	4.7%
Built 1939 or earlier	1,245	7.4%

Source: U.S. Census Bureau, 2013 ACS

Figure 7. Building Permits – Goldsboro, NC



Source: U.S. Census Bureau

HOUSING AFFORDABILITY

The median value of an owner-occupied housing unit in 2000 was \$84,700, compared to the 2013 median value of \$111,600, a 31.8% increase. Using the industry standard of three times the income to afford a median priced home, a household would need to earn \$37,200 annually to affordably own a home in Goldsboro based on the 2013 value.

According to the 2013 ACS, median contract rent in Goldsboro was \$510 monthly. This reflects an increase of \$184 (56.4%) since the 2000 Census (\$326 median contract rent). Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a 2013 household would need to earn \$20,400 annually to afford the median contract rent. Table 14 shows a comparison of housing costs between Goldsboro and other nearby communities including Wayne County. Goldsboro's median contract rent was 7% higher than Wayne County's and the median home value in Goldsboro was 2.8% higher than the County's. Of the other seven communities assessed, the City of Kinston has the lowest median contract rent at \$405 per month. The City of Raleigh has the highest median contract rent at \$758 per month. In terms of home value, the Cities of Kinston and Rocky Mount have similar median home values of \$105,600 and \$108,600, respectively. The City of Wilmington has the highest median home value at \$226,200 followed by City of Raleigh which has a median home value of \$207,000.

Table 14. Median Contract Rent and Median Home Value – Goldsboro, NC

Geographic Area	Median Contract Rent	Annual Income Required to Afford Median Rent(1)	Median Home Value	Annual Income Required To Afford Median Home Value (2)
Goldsboro	\$510	\$20,400	\$111,600	\$37,200
Fayetteville	\$688	\$27,520	\$125,800	\$41,933
Kinston	\$405	\$16,200	\$105,600	\$35,200
New Bern	\$594	\$23,760	\$149,000	\$49,667
Raleigh	\$758	\$30,320	\$207,000	\$69,000
Rocky Mount	\$482	\$19,280	\$105,500	\$35,167
Wayne County	\$477	\$19,080	\$108,600	\$36,200
Wilmington	\$706	\$28,240	\$226,200	\$75,400
Wilson	\$476	\$19,040	\$131,000	\$43,667

Source: U.S. Census Bureau, 2013 ACS

- 1) Income to afford median contract rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%).
- 2) Income to afford a home of median value was calculated by real estate industry standard of multiplying household income by three (3) to determine maximum affordable purchase price.

According to the 2013 ACS data, Goldsboro has 3,483 owners with mortgages. Of these owners, 262 or 7.5% pay more than 30 to 34.9% of their household income on housing costs; and 980 or 28.2% pay 35% or more. Also, there are 2,122 owners without mortgages; 48 or 2.3% pay 30 to 34.9% on housing costs; and 245 or 11.6% pay 35% or more on housing costs.

There are 8,236 occupied units paying rent and approximately 53% pay 30% or more of their household income on rental housing costs monthly; of this number 742 or 9.2% pay 30 to 34.9% of their income on rental housing costs. Another 3,522 or 43.5% pay 35% or more on renter housing costs.

According to Trulia, the median sales price for a home in Goldsboro in July 2015 was \$114,500. Based on household income reported in the 2013 ACS, an estimated 49% (7,077 households) of Goldsboro households could afford to purchase the median-priced home without cost burden. This is comprised of 3,935 owner households and 3,142 renter households.

In regards to affordability of rental units, the FY 2015 Fair Market Rent (FMR) for the Goldsboro, NC MSA ranged from \$452 for an efficiency unit to \$1,015 for a four-bedroom unit. Approximately 53% of

renters (4,687 households) can afford to rent an efficiency unit or a one-bedroom, 51% of renters (4,493 households) can afford to rent a two-bedroom unit, and 36% of renters (3,142 households) can afford to rent a three or four-bedroom unit.

Table 15. FY 2015 Fair Market Rents by Unit Bedrooms – Goldsboro, NC

Final FY 2015 FMRs By Unit Bedrooms				
Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
\$452	\$471	\$637	\$830	\$1,015

COMPREHENSIVE HOUSING AFFORDABILITY STUDY (CHAS)

HUD's Comprehensive Housing Affordability Study (CHAS) is a commonly-used gauge of housing affordability. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost-burdened. In cases where housing cost is 50% of income or greater, the household is considered severely cost-burdened.

Cost-burdened households have fewer financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), fewer resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction. CHAS data provides the number of households by income category within the City of Goldsboro that had housing problems by the type of household. The analysis below is based on this data. The latest available CHAS data utilizes 2011 ACS data which, provides detailed information about housing cost burdens across all income categories.

The definition of income categories and housing problems is as follows:

Income Categories

- Extremely low income: 0%-30% of the Area Median Income (AMI)
- Low income: 31%-50% of the AMI
- Moderate income: 51%-80% of the AMI
- Middle and upper income: 80% or More of the AMI

Housing Problems

According to HUD, a household with housing problems consists of:

1. Persons and families living in units with physical defects (lacking a complete kitchen or bath); or
2. Persons and families living in overcrowded conditions (greater than 1.01 persons/room); or
3. Persons and families cost-burdened (paying more than 30% of income for housing, including utilities).

According to the 2011 CHAS, of the 14,850 occupied housing units in the City of Goldsboro, 6,550 (44.1%) were occupied by owner households and 8,300 (55.9%) were occupied by renter households.

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The low- and moderate-income population totaled 6,640 (44.7%) households. The remaining 8,210 (55.3%) were occupied by households that earn incomes greater than 80% AMI. Among low- and moderate-income households, renters dominate the market. There were 4,985 (75.0%) low- and moderate-income renter households and 1,655 (25%) low- and moderate-income owner households. Table 16 shows the number of households by tenure and income category.

Table 16. Extremely Low, Low, and Moderate Income Households – Goldsboro, NC

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	520	2,070	2,590
Household Income >30% to <=50% HAMFI	495	1,325	1,820
Household Income >50% to <=80% HAMFI	640	1,590	2,230
Total Low/Mod Income	1,655	4,985	6,640
Household Income >80% to <=100% HAMFI	570	855	1,425
Household Income >100% HAMFI	4,325	2,460	6,785
Total	6,550	8,300	14,850

As is typical in most areas, lower income households have a greater incidence of housing problems than middle/upper income households. Of the 14,850 households, 5,395 (36.3%) have at least one housing problem. Renter households have a greater incidence of housing problems accounting for 3,500 (42.2%) of the households with at least one housing problem compared to 1,895 (29.0%) owner-occupied households. Of the households experiencing at least one housing problem, 4,400 (81.6%) of these households are of low- and moderate-income comprised of 3,235 renter household and 1,165 owner households. Tables 17-19 provides details on housing problems by tenure and income category.

Table 17. Housing Problems by Income Category – Goldsboro, NC

Income by Housing Problems (Owners and Renters)	Household has 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available	Total
Household Income <= 30% HAMFI	1,885	404	300	2,590
Household Income >30% to <=50% HAMFI	1,290	530	0	1,820
Household Income >50% to <=80% HAMFI	1,225	1,005	0	2,230
Total Low/Mod Income	4,400	1,939	300	6,640
Household Income >80% to <=100% HAMFI	375	1,045	0	1,425
Household Income >100% HAMFI	610	6,170	0	6,785
Total	5,395	9,155	300	14,850

Table 18. Housing Problems by Income Category (Renters Only)

Income by Housing Problems (Renters only)	Household has 1 of 4 Housing Problems	Households has none of 4 Housing Problems	Cost Burden not available	Total
Household Income <= 30% HAMFI	1,400	400	270	2,070
Household Income >30% to <=50% HAMFI	940	385	0	1,325
Household Income >50% to <=80% HAMFI	895	695	0	1,590
Total Low/Mod Income	3,235	1,480	270	4,985
Household Income >80% to <=100% HAMFI	155	700	0	855
Household Income >100% HAMFI	110	2,350	0	2,460
Total	3,500	4,530	270	8,300

Table 19. Housing Problems by Income Category (Owners Only)

Income by Housing Problems (Owners only)	Household has 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available	Total
Household Income <= 30% HAMFI	485	4	30	520
Household Income >30% to <=50% HAMFI	350	145	0	495
Household Income >50% to <=80% HAMFI	330	310	0	640
Total Low/Mod Income	1,165	459	30	1,654
Household Income >80% to <=100% HAMFI	220	345	0	570
Household Income >100% HAMFI	500	3,820	0	4,325
Total	1,895	4,625	30	6,550

Tables 20-22 provides data on cost burden for renters and owners. A total of 5,185 households or 34.9% of all households in Goldsboro are cost burdened and need affordable housing. The predominant housing problem experienced by households in Goldsboro is affordability. Of the 5,395 households with a housing problem, 5,185 (96.1%) are cost burdened. The CHAS data also indicates that renters also experience a higher incidence of cost burden. Broken down by tenure, 3,375 (40.7%) renters are in need of affordable

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housing compared to 1,815 (27.8%) owner households. Among low- and moderate-income households, 4,285 (64.5%) are cost burdened comprised of 3,165 renters and 1,125 owners.

Table 20. Cost Burden for Renters and Owners by Income Category - Goldsboro, NC

Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	1,865	1,330	2,590
Household Income >30% to <=50% HAMFI	1,295	610	1,820
Household Income >50% to <=80% HAMFI	1,125	130	2,230
Total Low/Mod Income	4,285	2,070	6,640
Household Income >80% to <=100% HAMFI	365	35	1,425
Household Income >100% HAMFI	535	140	6,785
Total	5,185	2,245	14,850

Table 21. Cost Burden for Renters Only by Income Category - Goldsboro, NC

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	1,380	925	2,070
Household Income >30% to <=50% HAMFI	940	410	1,325
Household Income >50% to <=80% HAMFI	845	65	1,590
Total Low/Mod Income	3,165	1,400	4,985
Household Income >80% to <=100% HAMFI	145	0	855
Household Income >100% HAMFI	65	0	2,460
Total	3,375	1,400	8,300

Table 22. Cost Burden for Owners Only by Income Category - Goldsboro, NC

Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	490	405	520
Household Income >30% to <=50% HAMFI	350	200	495
Household Income >50% to <=80% HAMFI	285	70	640

Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Total Low/Mod Income	1,125	675	1,655
Household Income >80% to <=100% HAMFI	220	35	570
Household Income >100% HAMFI	470	140	4,325
Total	1,815	850	6,550

Tables 23-26 provide an analysis of cost burden by tenure for elderly, small related, and large related households. According to the CHAS data, there were 4,674 households in Goldsboro with at least one member between the ages of 62. Approximately 45% (2,093 households) of the elderly households were of low- and moderate- income. Of the low- and moderate-income elderly population, 1,290 households were cost burdened of which 710 were severely cost burdened. Unlike the other household types examined (small related and large related), owner-occupied elderly households had a greater incidence of cost burden than the renter-occupied households. There were 690 owner-occupied elderly households that were paying more than 30% of their income on housing costs compared to 600 (renter-occupied elderly households).

The largest segment of Goldsboro's population is small related households (two to four members). The CHAS data indicates that there were 6,369 small related households. Of the 6,369 small related households, 2,670 (41.9%) were low- and moderate-income households. There were a total of 1,645 (61.6%) low- and moderate-income small related households experiencing cost burden. Of these, 1,395 were small related renter households and 250 were small related owner households.

Large related households (five or more members) also have high incidences of cost burden, according to the CHAS data. Of the 900 large related households, 429 (47.7%) were low- and moderate-income, and 264 (61.5%) of the low- and moderate-income households experience cost burden. The data shows that 225 of the low- and moderate-income large related renter households were experiencing cost burden and 39 owner-occupied low- and moderate income large related households are dealing with cost burden.

Table 23. Cost Burden for Renters by Income Category and Household Type - Goldsboro, NC

Cost Burden > 30% (renter)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	615	400	380	1,435
Large Related	90	45	90	255
Elderly	265	230	105	655
Other	410	260	265	1,020
Total Households by Income	2,070	1,325	1,590	8,300

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Table 24. Severe Cost Burden for Renters by Income Category and Household Type - Goldsboro, NC

Severe Cost Burden > 50% (renter)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	455	145	30	630
Large Related	65	10	-	75
Elderly	125	110	15	250
Other	280	145	20	445
Total Households by Income	2,070	1,325	1,590	8,300

Table 25. Cost Burden for Owners by Income Category and Household Type - Goldsboro, NC

Cost Burden > 30% (owner)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	80	105	65	465
Large Related	10	15	14	134
Elderly	315	200	175	854
Other	80	40	35	374
Total Households by Income	520	495	640	6,550

Table 26. Severe Cost Burden for Owners by Income Category and Household Type – Goldsboro, NC

Cost Burden > 50% (owner)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	55	65	-	135
Large Related	8	-	4	52
Elderly	290	115	55	484
Other	45	25	10	175
Total Households by Income	525	495	645	6,544

Like most communities, lower income households are the segment of the population most impacted by housing problems. Of Goldsboro's total population, renters have a larger percentage of housing problems than owners, 64.9% versus 35.1%. The greatest housing problem faced by all households is affordability. As expected, low income households were the most cost burdened households. Approximately 83% of cost burdened households were of low- and moderate-income.

Housing Problems within Racial and Ethnic Groups

In regards to housing problems within various racial and ethnic groups, according to the CHAS data, among renters, the racial and ethnic group with a disproportionately overall greater incidence of housing problems are Asian renters and Black/African American, Hispanic, American Indian/Native American, and 'Other' owner households. Racial and ethnic groups with a disproportionately greater income of cost burden are American Indian/Native American renters and Hispanic owners. Asian renters, American Indian/Native Americans owners, and 'Other' owners are disproportionately impacted by severe cost burden. See Tables 27 and 28.

Table 27. Housing Problems within Racial and Ethnic Groups - Goldsboro, NC

Racial/Ethnic Classification	# of Renters With Housing Problems	% of Renters With Housing Problems⁶	# of Owners With Housing Problems	% of Owners With Housing Problems
White	635	26.6%	695	19.6%
Black or African American	2,745	50.7%	1,065	39.4%
Hispanic	35	20.0%	64	44.1%
Asian	39	65.0%	18	24.0%
American Indian Native American	4	40.0%	20	57.1%
Pacific Islander	0	0.0%	0	0.0%
Other	50	20.4%	25	55.6%
TOTAL for All Households	3,508	42.3%	1,887	28.8%

Table 28. Cost Burden for Renters and Owners by Racial/Ethnic Groups - Goldsboro, NC

Income Category	All Renters		All Owners	
	Cost Burden	Severe Cost Burden	Cost Burden	Severe Cost Burden
White	365 (15.3%)	225 (9.4%)	445 (12.5%)	240 (6.8%)
Black/African American	1,555 (28.7%)	1,120 (20.7%)	465 (17.2%)	545 (20.2%)
Hispanic	10 (5.7%)	20 (11.4%)	60 (41.4%)	4 (2.8%)
Asian	15 (25.0%)	20 (33.3%)	0 (0.0%)	15 (20.0%)
American Indian/Native American	4 (40.0%)	0 (0.0%)	0 (0.0%)	20 (57.1%)
Pacific Islander	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Other	30 (12.2%)	15 (6.1%)	0 (0.0%)	25 (55.6%)
TOTAL	1,979 (23.9%)	1,400 (16.9%)	970 (14.8%)	849 (13.0%)

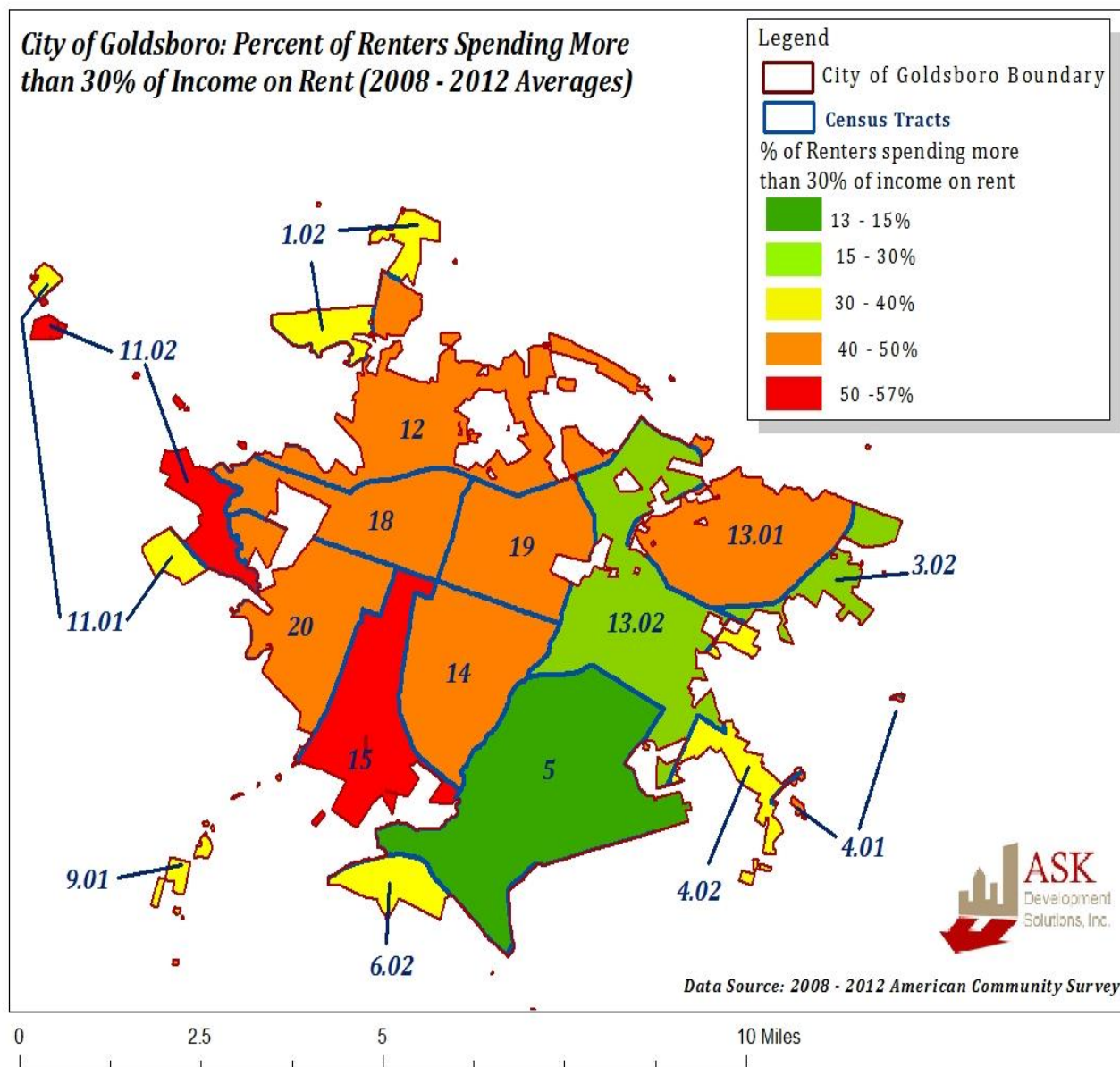
Some of the previous maps show that there is an overlap between areas of the City where renters and owners spend more than 30% of their income on housing (Maps 7 and 8) and areas with high percentage

⁶ The percentage of renters and owners with housing problems was determined by dividing the number of renters/owners with housing problems by the total number of households (renters/owners) by race.

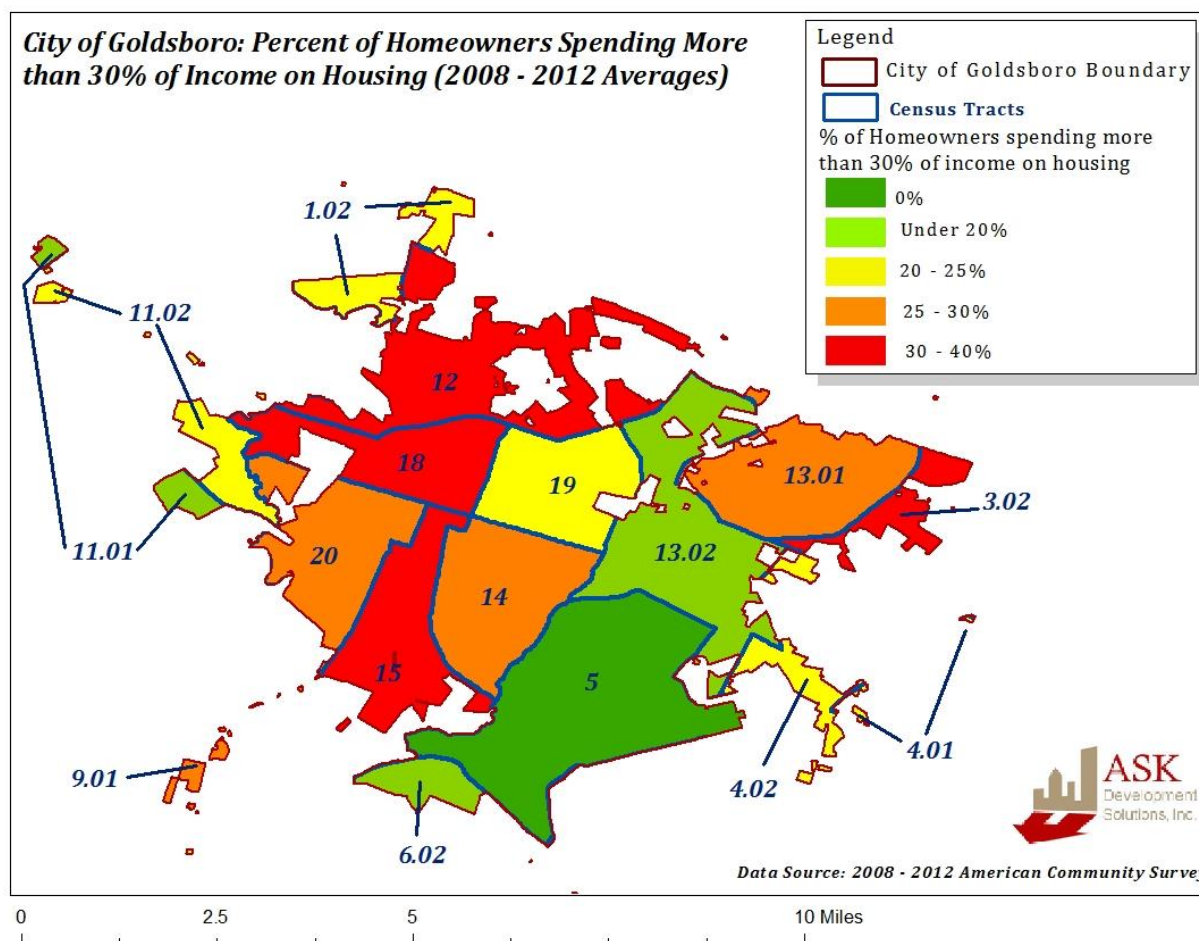
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of minority residents (Maps 2 and 3). These census tracts include 14, 15, 18, and 20. This is important, as such a high rate of renters with cost burden is likely to have a disparate impact on persons within the protected classes. If a tenant is paying more than 30% and often up to 50% of income on rent, then it severely restricts housing choices for persons with lower incomes and is a barrier because it indirectly impedes fair housing choice.

Map 7. Percentage of Renters Spending more than 30% of Income on Rent – Goldsboro, NC



Map 8. Percentage of Homeowners Spending more than 30% of Income on Housing – Goldsboro, NC



HOUSING STOCK AVAILABLE TO LOW INCOME HOUSEHOLDS

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety of income groups and ages such as the elderly. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing especially in areas of high poverty and low opportunities. The following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in the City of Goldsboro:

- Low income housing tax credits (LIHTC) – The LIHTC program administered by the North Carolina Housing Finance Agency provides for the development costs of low-income housing by giving a federal tax credit to investors for investing in housing for low-income households at 60% AMI.

- Section 202 Supportive Housing for the Elderly – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for very low-income elderly persons.
- Section 811 Supportive Housing for Persons with Disabilities – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for persons with disabilities. The program also provides rental assistance to state housing agencies for new and existing multi-family housing developments.
- Section 8 Loan Management Set-Aside (LMSA) Program – A HUD-funded program that provides financial assistance in the form of rental subsidies to multi-family properties subject to Federal Home Administration (FHA) insured mortgage loans which are in immediate or potential financing difficulty; and thereby to reduce the volume of mortgage loan defaults as well as claims for FHA mortgage insurance benefits from private lenders holding the FHA insured mortgage loans in such projects.⁷
- Public Housing – A HUD-funded program that provides financial assistance to local housing agencies (HAs or PHAs) to develop and operate decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. The public housing program in Goldsboro is administered by the Goldsboro Housing Authority.
- Section 8 Housing Choice Voucher Program – A HUD-funded program that provides financial assistance for the rental of housing from private landlords for eligible low-income families, the elderly, and persons with disabilities. Tenants are able to find their own housing including single-family homes, townhouses, and apartments. Map 9 shown below is a visual depiction of the location of public housing, LIHTC, and HUD-assisted Multifamily projects in Goldsboro.

Table 29 below provides a list of subsidized properties in Goldsboro including the type of housing, the number of assisted units, and the location of each project in regards to minority and low income concentration. There are a total of 23 properties comprised of 2,201 units including 5 projects/378 units for elderly households.

The North Carolina Housing Finance Agency (NCHFA) provides financing through the LIHTC Program for the development of privately owned affordable rental housing throughout the state. Between 2000 and 2014, the NCHFA financed eight projects in Goldsboro for a total of 417 affordable units.

The Goldsboro Housing Authority owns and operates five public housing properties with 1,225 units and also offers 237 housing choice vouchers. The public housing properties are Fair East, West Haven, Fairview Apartments, Lincoln Holmes, Woodcrest Terrace, Elmwood Terrace, Little Washington, and West Haven Apartments. The Eastern Carolina Regional Housing Authority (ECRHA) also operates the Brookside Manor and Winfrey Court public housing developments in Goldsboro.

⁷ U.S. Department of Housing and Urban Development (HUD) website. Section 8 Program Background Information.

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rfp/s8bkinfo

Accessed March 22, 2015

According to the Federal Financial Institutions Examination Council (FFIEC) census data for 2014, the Goldsboro, NC MSA⁸ has an average minority concentration of 48.4%. 'Minority tracts' are defined as census tracts where the minority concentration is at least 5% greater than the City as a whole. Based on this definition, there are five minority census tracts in Goldsboro where subsidized housing is located (14; 15; 18; 19; and 20). The minority tracts include 1,377 or 62.6% of the affordable rental units in the City.

In regards to the concentration of affordable housing based on income characteristics, 1,025 or 46.6% of the affordable rental units are in four low- and moderate-income census tracts (14; 15; 18; and 20) all of which are also minority census tracts.

According to HUD's Picture of Subsidized Households there are a 3,959 persons residing in subsidized housing for an average of 2.1 persons per unit. The household income per year is \$9,204 and each household spends \$215 per month on rent. In terms of household composition, 84% of households in subsidized housing are female-headed households and 45% of these households have children. Over 30% of households are elderly or frail-elderly and 18% of all persons have a disability. Of the households in subsidized housing, 86% are minority households and 33% of households are living below the poverty line.

According to the ECRHA's 2011 5-yr PHA Plan, all of the PHA's developments have a concentration of poverty. For the developments located in Goldsboro, the average income of 100% of occupied units was below 50% AMI. According to the PHA Plan, the ECRHA will upgrade units and the properties, increase security and safety of the communities, and improve marketing, management, and resident services in an effort to deconcentrate poverty.

Based on the review of the census data, the location of rent-restricted units appears to be concentrated in both lower income and minority area in the City of Goldsboro.

Table 29. Location of Subsidized Multifamily Housing - Goldsboro, NC

Project Name	Project Address	Low Income Units	Housing Type	Census Tract	Tract Minority %	Tract Median Family Income %
Laurel Pointe Apts	660 E New Hope Rd	48	Family	3.02	46.8%	98.5%
Laurel Pointe Apts II	660 E New Hope Rd	32	Family			
Alpha Arms	201 Alpha Ct	104	Family	12	52.6%	100.6%
The Grand at Day Point	2300 Country Day Rd	160	Family			
The Highlands	209 W Lockhaven Dr	60	Elderly			
Lochstone	603 W Lockhaven Dr	84	Family			
NBA Greenleaf Grace Village	2101 N William St	41	Elderly			
Ashebrooke	227 Randall	55	Family		49.2%	136.4%

⁸ The Goldsboro, NC MSA includes census tracts in the City of Goldsboro and may contain census tracts that are partially within Goldsboro or in the immediate surrounding area

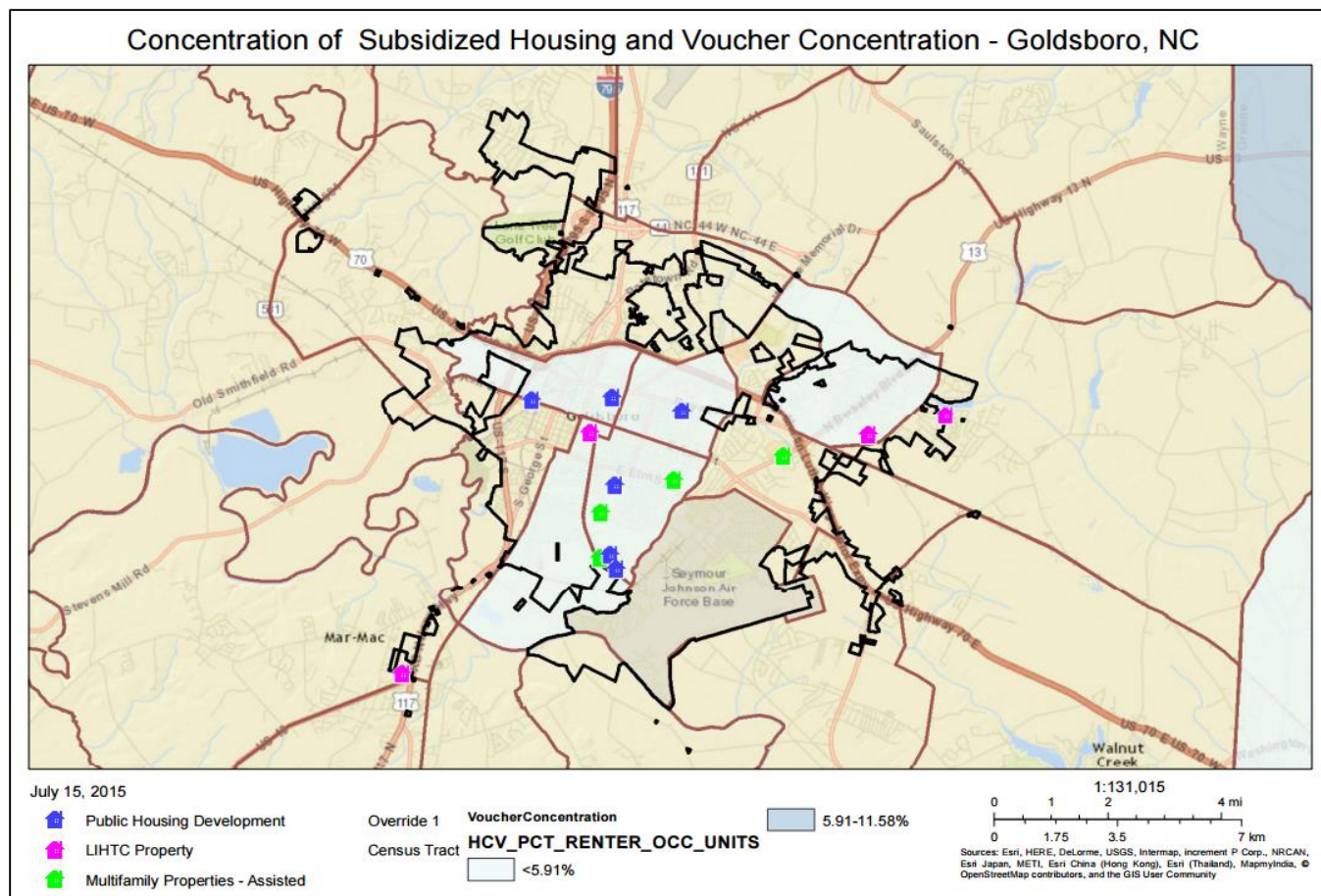
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Project Name	Project Address	Low Income Units	Housing Type	Census Tract	Tract Minority %	Tract Median Family Income %
	Lane			13.01		
Randall Place	317 Randall Lane	40	Family			
Kirkwood Retirement Village	2710 Langston Dr	140	Elderly	13.02	37.3%	118.1%
Oxford Plantation	179 Oxford Blvd	60	Family			
Lincoln Holmes	1009 Slaughter St	347	Family	14	80.3%	76.7%
Poplar Street Apts	1405 Poplar St	44	Elderly			
Elmwood Terrace	409 E. Hinson St	75	Family	15	90.7%	67.5%
Walnut Street Apts	508 E Walnut St	55	Elderly			
West Haven	701 West Oak St	50	Family	18	83.1%	38.5%
West Haven Apts	701 West Oak St	250	Family			
Woodcrest Terrace	709 N Waters St	75	Family			
Fairview Apts	1729 Edgerton St	253	Family	19	67.0%	81.3%
Huntington Senior Manor	1600 Tampa St	38	Elderly			
Jefferson Court Apts	1100 N Jefferson Ave	60	Family			
Little Washington	600 Whitfield Dr	50	Family	20	87.4%	63.9%
Waynesborough House	104 S Center St	80	Family			

Map 9 below is a visual depiction showing the location of public housing, LIHTC units, HUD-assisted multifamily projects, and voucher concentration relative to total housing units per tract.

Map 9. Location of Affordable Housing – Goldsboro, NC



HOUSING STOCK AVAILABLE TO PERSONS WITH DISABILITIES

To determine if there is sufficient housing available for persons with disabilities, you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a person with disabilities as “any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment.

The most recent comprehensive data on disability status among Goldsboro’s population was the U.S. Census 2013 ACS. According to the 2013 ACS, 16.8% (5,471 persons) in Goldsboro’s civilian non-institutionalized population reported a disability. The data included the following breakdown of the persons with disabilities by age group. The highest percentage of persons with disabilities occurred in the 65 and over population group (44.7%). See Table 30.

Table 30. Disability Status of the Civilian Non-Institutionalized Population - Goldsboro, NC

Population Status	Number	Percentage
Total Population	32,584	100.0%
With a Disability	5,471	16.8%
Population Under 5 years	3,014	9.2%
With a Disability	19	0.6%
Population 5 to 17 years	5,604	17.2%
With a Disability	332	5.9%
Population 18 to 64 years	18,979	58.2%
With a Disability	2,891	15.2%
Population 65 years and over	4,987	15.3%
With a Disability	2,229	44.7%

Source: US. Census Bureau, 2013 ACS

The 2013 ACS also provides information regarding types of disabilities within the Goldsboro population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the City and the least common disability reported among Goldsboro residents was vision difficulty. Within the 65 and over age group, the most common disabilities are ambulatory, independent living, and hearing while the majority of persons with disabilities in the 18 to 64 age group have ambulatory and cognitive difficulties. Goldsboro's total population with disabilities is 16.8% compared to Wayne County and North Carolina, where 15.2% and 13.3% report a disability, respectively. The population group with the largest percentage of persons with disabilities in Wayne County and North Carolina is also the elderly, where 42.0% and 38.1% of senior residents report some type of disability. Table 31 below shows the breakdown of persons with disabilities based on type of disability and age for 2013.

Table 31. Disability Characteristics - Goldsboro, NC

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	32,584	5,471	16.8%
Population under 5 years	3,014	19	0.6%
With a hearing difficulty		0	0.0%
With a vision difficulty		19	0.6%
Population 5 to 17 years	5,605	332	5.9%
With a hearing difficulty		30	0.5%
With a vision difficulty		0	0.0%

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Population/ Characteristic	Total	# With a Disability	% With a Disability
With a cognitive difficulty		290	5.2%
With an ambulatory difficulty		29	0.5%
With a self-care difficulty		18	0.3%
Population 18 to 64 years	18,979	2,891	15.2%
With a hearing difficulty		382	2.0%
With a vision difficulty		449	2.4%
With a cognitive difficulty		1,227	6.5%
With an ambulatory difficulty		1,614	8.5%
With a self-care difficulty		703	3.7%
With an independent living difficulty		1,138	6.0%
Population 65 years and over	4,987	2,229	44.7%
With a hearing difficulty		840	16.8%
With a vision difficulty		386	7.7%
With a cognitive difficulty		546	10.9%
With an ambulatory difficulty		1,599	32.1%
With a self-care difficulty		510	10.2%
With an independent living difficulty		915	18.3%

Source: US. Census Bureau, 2013 ACS

Many of the persons with disabilities in Goldsboro have more than one reported disability. Therefore, there is duplication between categories of disability items. Of the number of persons with disabilities, 2,716 (49.6%) report having two or more disabilities. Approximately 54% of elderly persons with disabilities report having two or more disabilities and 51% of persons between the ages of 18 and 64 with disabilities have two or more disabilities.

Table 32. Age by Number of Disabilities - Goldsboro, NC

Population	Number
Total Population	32,584
Population under 18 years	8,616
With one type of disability	316
With two or more types of disability	35
Population 18 to 64 years	18,979
With one type of disability	1,422

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Population	Number
With two or more types of disability	1,469
Population 65 years and over	4,987
With one type of disability	1,017
With two or more types of disability	1,212

Source: US. Census Bureau, 2013 ACS

To further analyze the housing challenges of persons with disabilities in Goldsboro, the CHAS data was examined to determine the extent of housing problems and housing needs, particularly for low- and moderate-income households with a disabled member. Based on the review of the CHAS data, extremely low income disabled member households were disproportionately impacted by housing problems.

Information on disability status is available for the 2008-2010 ACS. The data provides the most recent detailed data of housing problems of disabled residents based on their household income. There were 8,035 households with a disabled member, of which 5,035 (62.7%) were low- and moderate-income. According to the CHAS data, 3,160 low- and moderate-income persons with disabilities member households had housing problems.

Table 33. Disabled Member Households with Housing Problems - Goldsboro, NC

Income Category	Number of Disabled Member Households	# of Disabled Member Households with Housing Problem	% of Disabled Member Households with Housing Problem
Extremely Low Income	1,760	1,360	77.3%
Low Income	1,495	905	60.5%
Moderate Income	1,780	895	50.3%
TOTAL Low/Moderate-Income	5,035	3,160	62.8%

Within disabled member renter households, 70.7% with household incomes less than 30% AMI had housing problems; 55.6% with household incomes greater than 30% but less than 50% AMI had housing problems; and 60.6% of households with incomes greater than 50% but less than 80% AMI had housing problems.

Table 34. Disabled Member Renter Households with Housing Problems - Goldsboro, NC

Income Category	Number of Disabled Member Renter Households	# of Disabled Member Renter Households with Housing Problem	% of Disabled Member Renter Households with Housing Problem
Extremely Low Income	1,145	810	70.7%
Low Income	1,070	595	55.6%
Moderate Income	940	570	60.6%
TOTAL Low/Moderate-Income	3,155	1,975	62.6%

Within disabled member owner households, 89.4% with household incomes less than 30% AMI had housing problems; 72.9% with household incomes greater than 30% but less than 50% AMI had housing problems; and 38.7% of households with incomes greater than 50% but less than 80% AMI had housing problems.

Table 35. Disabled Member Owner Households with Housing Problems - Goldsboro, NC

Income Category	Number of Disabled Member Owner Households	# of Disabled Member Owner Households with Housing Problem	% of Disabled Member Owner Households with Housing Problem
Extremely Low Income	615	550	89.4%
Low Income	425	310	72.9%
Moderate Income	840	325	38.7%
TOTAL Low/Moderate-Income	1,880	1,185	63.0%

While the CHAS data does not provide details on the type of housing problems faced by persons in disabled-member households; typically having a disability impacts earning potential and capacity to secure housing. Therefore, residents with disabilities often face affordability issues. According to the 2013 ACS, in Goldsboro, 568 persons with a disability are a part of the labor force, 268 (47.2%) persons with disabilities are unemployed, and 2,055 (37.6%) persons with a disability are not in the labor force. The median earnings of persons with disabilities is approximately \$6,000 less than persons without a disability.

The 2015-2019 Goldsboro Consolidated Plan indicated that persons with disabilities are underserved. The Consolidated Plan states that the current housing options for persons with developmental disabilities are with their families, family care homes, group homes, rest homes or nursing homes; depending on the degree and severity of the disability. However, affordable housing is still needed for persons with

disabilities. To address this need the City has prioritized funding activities that preserve the City's existing housing stock which includes the rehabilitation of substandard housing. Elderly persons and persons with disabilities are the main focus of the rehabilitation program. Additionally, transitional housing is a priority and the City encourages non-profits to develop and manage housing for people with special needs such as the frail elderly, persons with disabilities, and the homeless. The City will continue to support the efforts of private developers and non-profit agencies that build multifamily rental unit for special needs populations.

The City's Community Development Department as well as other agencies such as Disabled American Veterans (DAV) Chapter 45, First Baptist Church Helping Hands Organization, Marion Edward Recovery Center Initiatives (MERCİ), NC Independent Living, RSM Harris Assoc., Habitat for Humanity of Goldsboro, and the Goldsboro Housing Authority operate home rehabilitation programs and/or provide affordable housing for disabled persons. The home repair programs include roof repair/replacement, electrical and plumbing repairs, handicapped modifications and interior and exterior structural repairs, and installation of ramps.

There are also laws in place with the goal of increasing the supply of accessible units. As indicated in the Consolidated Plan, the North Carolina Building Code requires developers to make at least 5% of the units or a minimum of one unit accessible to persons with disabilities in any multifamily project containing more than eleven units. The Plan states that developers are opting to exceed the minimum requirement but, there is no data available as to the total number of accessible units within the City.

In regards to housing currently available to persons with disabilities, the lead agency for the Continuum of Care, the Down East Coalition, utilizes Shelter Plus Care funding for a tenant-based rental assistance program for homeless individuals and families with disabilities, HIV/AIDS, and substance abuse problems. In addition to rental assistance, according to the Consolidated Plan, there are approximately 48 group homes for developmentally disabled adults and children in Wayne County. Cherry Hospital is a 403-bed inpatient psychiatric hospital serving the citizens of 33 eastern North Carolina counties operated by the State of North Carolina, Department of Health and Human Services and the O'Berry Center is a state-run residential facility for persons with mental retardation. The CHC of Wayne County is a Section 811-funded development with seven total units, six of which are designated for persons with disabilities.

Table 36 below provides the listing of adult care facilities as provided by the Goldsboro Police Department's Crime Mapping Tool.

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Table 36. Adult Care Facilities - Goldsboro, NC

Methodist Home for Children	Barnes Family #3	Emmanuel Group Home
Golden Years Group Home – White Oak	Nova Group Home #3	University Group Home
White Oak Group Home 5	Angels Wings	Harbor House
White Oak Home – Jr Place	Norwood Avenue Home	The Stepping Stone
Renu Life LLC	Peele Street Group Home	Nancy Garris Mentor Home
Tinderwood Renu Life	Edwar Group Home	Howell And Howell's
Lakeview Renu Life	Grantham Family Care	Wayne County Group Home #1
Wayne County Group Home #2	The Vaugh Family Home	Angelic House
ASA Living Inc.	Goldsboro Disciple Rest Home	Northwood Respite Home
Life Inc.	Clairborne Place MHA	Stancils Family Care
Nova Belfast Brown House	Gulley House Envisions of Life	Belfast Group Home
Newcomb Family Care	White Oaks Group Home #12	John Oliver Center #2
John Oliver Center #3	John Oliver Center #4	Flynns Christian Fellowship
Daez of New Vision	Living in Hope	Wayside Fellowship
Rosewood Family Care	Emmaus House #2	Vineyard Homes #1

Based on the size and needs of Goldsboro's disabled population it is clear that one of the issues disabled residents face is a lack of affordable and accessible housing. The extent of the need is difficult to quantify because of insufficient data on the number of accessible units in the City, particularly in the private market. The lack of affordable and accessible housing for persons with disabilities is an impediment to fair housing choice. Due to the lack of resources to meet the housing needs of Goldsboro's disabled population, the City should continue to prioritize the preservation and development of sufficient affordable and accessible housing stock for the disabled.

HOUSING STOCK AVAILABLE TO ELDERLY PERSONS

According to the 2010 U.S. Census, there were 5,444 elderly persons (over 65 years of age) living in Goldsboro, comprising 14.9% of the population. Of the 5,444 elderly persons, 2,666 persons (49.0%) over the age of 75 are considered to be extra-elderly or frail elderly. The elderly population rate is higher in Goldsboro when compared to Wayne County where elderly persons represent 13.1% of the total population. In terms of growth between 2000 and 2010, persons in the age group 55-64 years have experienced the greatest increase in both Goldsboro and the Wayne County. The population over the age of 65 increased by 1.4% in Goldsboro and 22.6% in Wayne County between 2000 and 2010.

Table 37. Population Distribution by Age Group – Goldsboro and Wayne County, NC

Goldsboro	No. of persons (2000)	%	No. of persons (2010)	%	% change
Under 44	25,864	66.2%	21,785	59.8%	-15.8%
45-54	4,681	12.0%	5,001	13.7%	6.8%
55-64	3,130	8.0%	4,207	11.5%	34.4%
65-74	2,862	7.3%	2,778	7.6%	-2.9%
Over 75	2,506	6.4%	2,666	7.3%	6.4%
Total	39,043	100.0%	36,437	100.0%	-6.7%
Wayne County	No. of persons (2000)	%	No. of persons (2010)	%	% change
Under 44	75,383	66.5%	74,376	60.7%	-1.3%
45-54	14,753	13.0%	17,733	14.5%	20.2%
55-64	10,084	8.9%	14,436	11.8%	43.2%
65-74	7,670	6.8%	9,100	7.4%	18.6%
Over 75	5,439	4.8%	6,978	5.7%	28.3%
Total	113,329	100.0%	122,623	100.0%	8.2%

Elderly and Extra Elderly

The 2011 CHAS data indicates that there were 4,667 elderly households that have mobility or self-care limitations. This figure is broken down into 1,489 renter households, and 3,178 owner households. Of the 1,489 renters with mobility and self-care limitations, 1,080 (72.5%) are low- and moderate-income households. The renter households with the highest rate of housing problems are moderate income extra elderly 1- & 2-member households. Elderly is defined as a household composed of one or more persons at

least one of whom is 62 years of age or more. Extra elderly is defined as a 1- & 2- member household where either person is 75 years of age or older. Among renters, housing problems disproportionately impact the extra elderly 1- & 2-member households at all income levels except middle/upper income and the extremely low income elderly 1- & 2-member households.

Table 38. Housing Problems for Renters with mobility/Self Care Limitations - Goldsboro, NC

Household by Type, Income, & Housing Problem	Extra Elderly 1- & 2 Member Households	Elderly 1- & 2 Member Households	Other Households	Total Renters
Extremely Low Income	145	250	1,675	2,070
% With Housing Problems	120 (82.8%)	180 (72.0%)	1,100 (65.7%)	1,400 (67.6%)
Low Income	230	205	895	1,330
% With Housing Problems	150 (65.2%)	110 (53.7%)	680 (76.0%)	940 (70.7%)
Moderate Income	85	165	1,340	1,590
% With Housing Problems	90 (100.0%)	60 (36.4%)	745 (55.6%)	895 (56.3%)
Middle/Upper Income	310	99	2,905	3,314
% With Housing Problems	70 (22.6%)	29 (29.3%)	165 (5.7%)	264 (8.0%)
Total Households	770	719	6,815	8,304
% With Housing Problems	430 (55.8%)	379 (52.7%)	2,690 (39.5%)	3,499 (42.1%)

Further analysis of the CHAS data shows that of the 3,178 owner households with mobility and self-care limitations, 1,003 (31.6%) are considered low- and moderate-income households. Household groups with extremely low income have the highest rate of housing problems. Moderate income elderly 1- & 2 member owner household also have a disproportionately high incidence of housing problems as illustrated below.

As examined earlier in Tables 23-26 (Cost Burden by Household Type and Tenure), 1,290 low- and moderate-income elderly households are cost-burdened which is approximately 90% of the 1,435 elderly households with a housing problem.

Table 39. Housing Problems for Owners with Mobility & Self Care Limitations - Goldsboro, NC

Household by Type, Income, & Housing Problem	Extra Elderly 1- & 2 Member Households	Elderly 1- & 2 Member Households	Other Households	Total Owners
Extremely Low Income	209	114	194	517
% With Housing Problems	205 (98.1%)	110 (96.5%)	170 (87.6%)	485 (93.8%)
Low Income	210	110	175	495
% With Housing Problems	130 (61.9%)	75 (68.2%)	150 (85.7%)	355 (71.7%)
Moderate Income	155	205	276	635
% With Housing Problems	35 (22.6%)	170 (82.9%)	125 (45.3%)	330 (52.0%)
Middle/Upper Income	800	1,375	2,720	4,895
% With Housing Problems	50 (6.3%)	170 (12.4%)	510 (18.8%)	730 (14.9%)
Total Households	1,374	1,804	3,364	6,542
% With Housing Problems	420 (30.6%)	525 (29.1%)	955 (28.4%)	1,900 (29.0%)

As is the case with housing for persons with disabilities, the City of Goldsboro has prioritized the funding of rehabilitation programs for housing occupied by elderly members and development of housing for special needs populations including the elderly. The current housing stock dedicated to elderly persons includes six subsidized housing projects consisting of 420 units. These projects are Waynesborough House, Greenleaf Grace Village, Walnut Street Apartments, Kirkwood Retirement Village, Highlands of Goldsboro, and Poplar Street Apartments. There are also two non-subsidized apartment developments, Huntington Manor Apartments and Heather Dawn Estates. According to the City's FY 2015-2019 Consolidated Plan, the Goldsboro Housing Authority has 100 units designated as elderly and 217 units of the total housing authority units are occupied by the elderly. Goldsboro Housing Authority also administers Section 8 vouchers, with 49 provided to the elderly. The Eastern Carolina Housing Authority has another 61 units occupied by elderly households.

According to the Consolidated Plan, the City will continue to use its single family rehabilitation program to provide the necessary home repairs and modifications for elderly and disabled homeowners to help those persons remain in their homes and independent for as long as possible. For those elderly persons that are no longer able to live independently, there are three types of institutional housing: nursing homes, adult care homes, and family care homes. The Goldsboro Police Department Mapping Tool includes a listing of nursing and rest homes. The table below is a report on nursing homes in Goldsboro.

Table 40. Nursing and Rest Homes - Goldsboro, NC

Magnolia Place	Brian Center	The Pines of Goldsboro
Woodard Retirement Village	Somerset Court	Renu Life Extended
RHA Howell Walnut Creek Facility	Woodard Care Inc.	Britthaven of Goldsboro
Skills Creations of Goldsboro	Sterling House	Goldsboro Assisted Living

It is clear that there is a shortage of affordable housing for elderly persons in Goldsboro. Based on the available housing units dedicated to elderly households and the high incidence of cost burden experienced in elderly households, there is a gap in the availability of affordable living options. In addition, 44.7% of elderly persons in Goldsboro have at least one disability, demonstrating the need for accessible housing.

HOMEOWNERSHIP BY RACE AND ETHNICITY

Table 41 depicts homeownership rates by race in Goldsboro, Wayne County, and other neighboring communities. Rates of homeownership vary widely by race/ethnicity in the City of Goldsboro and its neighboring communities. The overall rate of homeownership in Goldsboro, for all races, was 38.8% according to the 2013 ACS. In all the communities examined, Whites have the highest rate of homeownership followed by Black/African Americans and then persons of Hispanic ethnicity. The Goldsboro overall homeownership rate is lower than all the other areas and 22% less than that of Wayne County. Although Black/African Americans are the largest segment of Goldsboro's population, accounting for 54.7% of the population, and Whites are the second largest segment at 37.5%, Black/African Americans have the lower homeownership rate. This could be due to several factors such as income and credit worthiness. The Home Mortgage Disclosure Act (HMDA) Data Analysis section of this document will evaluate whether there are any discriminatory lending practices in Goldsboro that contribute to the lower homeownership rate for minorities.

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Table 41. Comparison of Homeownership Rates by Race/Ethnicity by Jurisdiction

County or City	Overall Ownership Rate	Ownership Rate White	Ownership Rate Black/ African American	Ownership Rate American Indian and Alaska Native	Ownership Rate Asian	Ownership Rate Native Hawaiian and Other Pacific Islander	Ownership Rate Some Other Race and Two or More Race	Ownership Rate Hispanic
Goldsboro	38.8%	54.6%	41.9%	0.3%	1.2%	0.0%	2.0%	3.0%
Fayetteville	49.9%	54.0%	38.0%	0.8%	3.0%	0.2%	3.9%	7.1%
Kinston	45.9%	48.8%	48.8%	0.3%	0.0%	0.0%	2.2%	2.1%
New Bern	50.9%	74.9%	20.4%	0.2%	2.0%	0.0%	2.5%	4.1%
Raleigh	53.6%	73.8%	20.3%	0.2%	3.6%	0.0%	2.1%	4.3%
Rocky Mount	54.3%	52.5%	45.1%	0.3%	1.1%	0.0%	2.1%	1.7%
Wayne County	60.7%	72.2%	22.2%	0.2%	0.6%	0.0%	4.8%	5.7%
Wilmington	46.7%	87.5%	10.7%	0.2%	0.8%	0.0%	0.8%	2.0%
Wilson	50.9%	66.8%	27.7%	0.2%	1.3%	0.0%	4.0%	4.4%

Source: American Community Survey, U.S. Census (2012)

The City of Goldsboro utilizes HOME funding to provide homebuyer assistance to low- and moderate-income households. According to the City's FY 2013-2014 CAPER, the City had a goal of assisting 50 households and as of the 4th Year (PY 2013) of the Consolidated Planning period, the City had assisted 20 households. According to the FY 2015-2019 Consolidated Plan, the City plans to continue the Homebuyer Assistance Program and provide up to \$30,000 in HOME funds per eligible household for down payment and closing costs assistance. The City has a goal of assisting 7 homebuyers.

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

The definition of a racially/ethnically-concentrated area of poverty (R/ECAP) as developed by the HUD Office of Policy Development and Research (OPDR) requires R/ECAPs census tracts to have a minority population of 50% or more and an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower). Analyzing the concentration of minorities in high poverty areas assists in the review of access to housing.

Based on the HUD definition, there are no census tracts in Goldsboro that are considered racially/ethnically-concentrated areas of poverty. Data used to make this determination was gathered from the Federal Financial Institutions Examination Council (FFIEC) census files. There are 8 census tracts in Goldsboro that have a tract minority percentage of 50% or more however, there are no tracts that have an individual poverty rate of 40% or more or an individual poverty rate that is 3 times the tract average for the area.

RECENT CITY HOUSING ACCOMPLISHMENTS AND USE OF RESOURCES

The City of Goldsboro is a recipient of Community Development Block Grant (CDBG) and HOME Investment Partnership funds and as such is required to report accomplishments under these programs to HUD on an annual basis. The report submitted to HUD is known as the Consolidated Annual Performance Evaluation Report (CAPER). The City's housing accomplishments highlighted here collected from the FY 2013-2014 CAPER and cover accomplishments during the FY 2010-2014 Consolidated Planning period.

The City operates a housing rehabilitation program that addresses roof repair/replacement, electrical and plumbing repairs, modifications for disabled persons, interior and exterior structural repairs, heating system replacement, and health and safety/code violation repairs. The City provides low interest, deferred payment loans to eligible households that reside within the City limits. During the four year period, the City assisted 13 households under the rehabilitation program. The City also utilized funding from the North Carolina Housing Finance Agency (NCHFA) to complete urgent repairs on six housing units during FY 13-14.

In addition to the owner-occupied rehabilitation program, the City also assists homebuyers with the acquisition of single-family homes. The City provides up to \$30,000 in down payment assistance plus additional funds for closing costs. This program has assisted the most households over the last four years with 20 households benefitting.

The City funds a demolition and clearance activity with the goal of addressing slum and blight in low- and moderate-income neighborhoods. In this program, the City determines that rehabilitation of vacant, substandard housing is not economically feasible. During FY 2013-2014, seven structures were demolished and a total of 13 dilapidated structures have been demolished over the past four years.

The HOME program requires that the City set-aside 15% of the annual HOME allocation to a certified Community Housing Development Organization (CDHO). The City of Goldsboro has three housing organizations that have been certified as CHDOs. They are Habitat for Humanity of Goldsboro-Wayne, Rebuilding Broken Places CDC, and Goldsboro Development Corporation. The City has funded 10 CDHO projects in the last four years including the development of one affordable housing unit by Habitat for Humanity during FY13-14.

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Also under HOME, between FY 2011-2012, the City partnered with an affordable housing developer to construct Highlands of Goldsboro. Highlands of Goldsboro is a 60-unit affordable rental housing development for seniors. Three of the units were designated as HOME-assisted and are being rented to very low income households.

Table 42. FY 2010-2013 Housing Accomplishments - Goldsboro, NC

Activity	PY 2010	PY 2011	PY 2012	PY 2013	TOTAL
Housing Rehabilitation	7	4	1	1	13
Homebuyer Assistance	7	6	1	6	20
Demolition and Clearance	1	2	3	7	13
CHDO activity	4	4	1	1	10
Affordable Housing Development	0	0	1	0	1
Urgent Repair	0	0	0	6	6

PUBLIC HOUSING AUTHORITY POLICIES

Public Housing is a program funded by the U.S. Department of Housing and Urban Development (HUD) for low-income residents. Annual gross income must be within limits as established by HUD, and eligible families pay a monthly rent equal to the greatest of 30% of their monthly adjusted income or 10% of unadjusted monthly income.

The HUD Section 8 Housing Choice Voucher Program is a federal program for assisting very low-income families, the elderly, and the disabled to secure affordable, decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual, and participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. Housing choice vouchers are administered locally by public housing agencies (PHAs). A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live.

Since 1974, HUD has helped low income households obtain better rental housing and reduce the share of their income that goes toward rent through a program that relies on the private rental market. In 1997, 1.4 million households held Section 8 certificates or vouchers, which allow them to rent eligible units in the private market and receive rental subsidies from the federal government. A key parameter in operating the certificate and voucher programs is the Fair Market Rent (FMR).

Since Congress established the Section 8 program in 1974, there have been three definitions of FMRs. The current definition, which became effective in 1995, contains several elements: “The FMR is the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market.” FMRs are set for rental units based on the number of bedrooms. Section 8 rules determine eligible units by household size and the age and sex of children. The City of Goldsboro is served by two public housing authorities, the Goldsboro Housing Authority (GHA) and the Eastern Carolina Regional Housing Authority (ECRHA). The Goldsboro Housing Authority has been in existence since 1950. The GHA owns and operates 1,225 public housing units and manages 237 Section 8 Housing Choice Vouchers. The GHA operates 25 rental homes as well as the following six developments:

- Lincoln Homes
- Fairview Homes
- Westhaven Apartments
- Elmwood Terrace
- Woodcrest Terrace
- Little Washington

The mission of the agency is to provide safe, quality, affordable housing to low-income families, the elderly, and persons with disabilities. In order to achieve this mission, the GHA established five long-term goals in its 2011 PHA Annual Plan. The goals are as follows:

1. Ensure a well maintained housing stock
2. Maintain and enhance resident safety and security
3. Expand homeownership opportunities and self-sufficiency programs
4. Increase assisted housing choices to meet demand
5. Promote fair housing and equal opportunity

The ECHRA operates 717 public housing units most of which are located in rural areas. According to the ECHRA 2011 PHA Annual Plan, the agency operates in nine other cities other than Goldsboro. The other nine cities are Morehead City, Clinton, Roseboro, Havelock, Angier, Clayton, Jacksonville, Magnolia, and Beulaville. The two developments operated by ECHRA that are located in Goldsboro are Brookside Manor and Winfrey Court. At the time of the preparation of the annual plan, 180 units were occupied by Goldsboro residents. The ECRHA maintains a waiting lists for all the cities served. There were 387 households on the waiting list of which 55 households were from the City of Goldsboro. The majority of households in Goldsboro were waiting on one-bedroom units (28), followed by two-bedroom units (19).

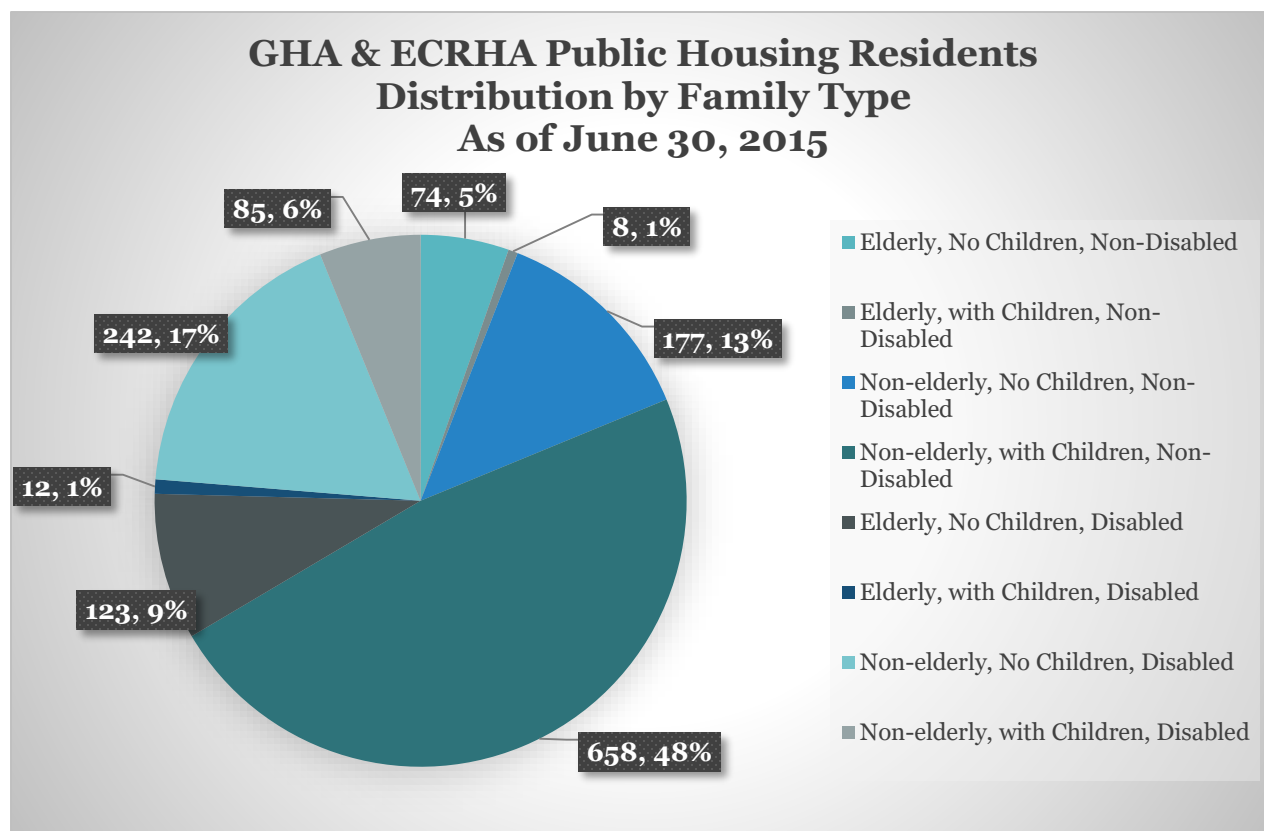
GHA’s Resident Characteristic Report (as of June 30, 2015) shows that 76% of public housing residents are extremely low income (<30% AMI), 17% of recipients are very low income (31-50% AMI), and 5% of recipients are low income (51-80% AMI). The average annual family income is \$9,102 and the main sources of income are Supplemental Security Income (SSI), Social Security Income (SS), and Pension (46%); welfare (35%); other (33%); and wages (30%). In regards to race/ethnicity, 93% of residents are Black or African American and 7% are White.

The characteristics of residents in the two ECRHA public housing developments are similar to GHA’s. The average annual family income is \$8,804 and 81% of residents are extremely low income, 16% very low income, and 2% are low income. The main sources of income are SSI/SS/Pension (45%); wages (35%); other (3%); and welfare (5%). The racial makeup of residents in the ECRHA development is also predominantly Black or African American at 97% and 3% of residents are White.

The household composition of the public housing residents in both housing authorities is shown in Figure 8 below. There are a 730 female headed households with children. There are 217 elderly households of

which 20 households include children. Approximately 62% or 135 elderly households report a disability. Amongst non-elderly households, 327 households or 28.1% report a disability out of a total of 1,162 non-elderly households. About 743 non-elderly households include children.

Figure 8. Public Housing Resident Distribution by Family Type – Goldsboro, NC



Public Housing Fair Housing Policies

Public housing authorities are required to certify that they will carry out the public housing program in conformity with several federal laws, including the Fair Housing Act. In regards to fair housing, the objectives of the GHA are to provide sufficient training for staff and to participate in workshops and training sessions developed to bring awareness to fair housing and equal opportunity.

Similar to the GHA, the ECRHA has committed to providing training to employees in regards to existing laws for fair housing and equal opportunity and require all employees to attend refresher courses annually. The ECRHA also posts signs on bulletin boards in all ECRHA offices showing the current rules and regulations governing fair housing and equal opportunity.

Some of ECRHA's policies and practices that impact fair housing are outlined below:

Tenant Selection and Assignment

Each applicant for public housing programs are placed on a site-based waiting list based on factors such as size and type of unit required, preference, and date and time the application is received. ECRHA's Admissions and Continued Occupancy Plan (ACOP) states that the ECRHA will consistently follow this

policy and affirmatively further fair HUD's fair housing goals. Applicants may choose which site-based waiting list to be placed on but ECHRA monitors the lists to ensure that racial steering does not occur. Tenant selections from the waiting lists are based on preference, income targeting, de-concentration of poverty and income mixing, and integration to reduce racial and national origin concentrations.

Reasonable Accommodation

ECRHA's policies are designed to ensure that persons with disabilities have full access to utilize the housing programs and services. ECRHA notifies applicants and residents of their ability to request reasonable accommodations on ECRHA's forms and letters to all families. Requests for reasonable accommodations are granted when ECRHA verifies that they meet the need presented by the disability and they do not create an undue financial and administrative burden. Reasonable accommodation requests are considered from the time of application to selection and during occupancy and is included in all the Authority's policies such as occupancy standards, transfers, pet policy, and grievance procedures.

Nondiscrimination

ECRHA does not discriminate because of race, color, sex, religion, familial status, disability, sexual orientation, or national origin. To further the fair housing objective, ECHRA takes the following actions:

- Includes a section on compliance with civil rights law in its admission briefings;
- Displays fair housing posters in every development owned by the ECHRA and in administrative offices;
- Uses the Equal Housing Opportunity logo in all advertising and in all marketing publications of the ECRHA;
- Maintains a TDD/TTY machine or access to a TDD/TTY for the use of the hearing impaired; and
- Publishes materials in English and any other languages commonly spoken in the jurisdiction.

Limited English Proficiency

ECRHA has committed to taking affirmative steps to communicate with persons with Limited English Proficiency (LEP). The PHA provides oral interpretation and written translation of vital documents and written materials for each eligible LEP language group.

Grievance Procedures

ECRHA's grievance procedures apply when a family disagrees with a decision by the Authority based on any action, decision, or inaction by ECRHA. Persons with disabilities are provided reasonable accommodation to provide the disabled persons with an opportunity to use the grievance procedures equal to a non-disabled person. There are different aspects to the grievance and appeals process including complaints, appeals by applicants, and tenant grievances.

When applicants are determined to be ineligible for public housing programs or if the ECRHA does not have an appropriate unit in its inventory to serve an applicant, written notification will be provided to the applicant including the reason for the determination and inform the applicant that they can seek an informal hearing. The request for the informal hearing must be received within 10 working days from the date of notification of ineligibility. ECRHA will provide an informal hearing within 10 working days of receiving the applicant's request. Within 10 working days of the informal hearing, the Hearing Officer will mail a written decision to the applicant and place a copy of the decision in the applicant's file.

IV. COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of community reinvestment, fair housing complaint data, legal cases, foreclosure data, and HMDA data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist. Review of HMDA data and foreclosure rates assist in determining if abusive and predatory lending practices are present in the City.

CRA COMPLIANCE

The CRA, enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The CRA requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. CRA examinations are conducted by the Federal Financial Institutions Examinations Council (FFIEC) of federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS)⁹.

The CRA requires that each institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is used in considering an institution's application for deposit facilities, including mergers and acquisitions. A financial institution's performance is evaluated along with its financial condition and business strategies, its community, and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system of "Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance."

A search of the FFIEC website produced three CRA Performance Ratings for banks based within the city limits of Goldsboro, NC. (It should be noted that a bank may have been rated more than once.) The three bank examinations received a rating "Satisfactory". The examinations and ratings are provided below by examination date. The CRA data is dated because both banks became inactive in 1993 after they merged with other banks. There are currently no active banks headquartered in Goldsboro. See Table 43.

Table 43. FFIEC CRA Performance Ratings - Goldsboro, NC

Exam Date	Bank Name	City	State	FFIEC CRA Rating	Asset Size (in thousands)
5/6/1991	East Coast Savings Bank, SSB	Goldsboro	NC	Satisfactory	\$253,216
4/1/1991	New East Bk of Goldsboro	Goldsboro	NC	Satisfactory	\$23,483
9/14/1992	New East Bk of Goldsboro	Goldsboro	NC	Satisfactory	\$31,206

Source: FDIC, <http://www.ffiec.gov/craratings>

⁹ OTS is no longer an active regulatory agency therefore there will be no CRA ratings updates after June 30, 2011 for the OTS.

In addition, the FFIEC publishes annual Census Reports that use a limited number of demographic, income, population, and housing data from the FFIEC's Census files prepared for HMDA and CRA data. The FFIEC updates the Census Windows Application annually to reflect changes to MSA/MD boundaries announced by the Office of Management and Budget (OMB), include income estimates developed by the FFIEC, and include CRA distressed/underserved tracts as announced by the federal bank regulatory agencies.

FAIR HOUSING COMPLAINT DATA

The City of Goldsboro Community Affairs Commission receives and investigates complaints or charges of discrimination in housing and employment within the City of Goldsboro and one mile extraterritorial jurisdiction.

Reviewing complaint data assists in identifying any discriminatory housing patterns in a community. The data used for this analysis was for the period January 2009 through December 2014 and covers the housing discrimination complaints filed along with the basis of the complaints. During the reporting period, there were 11 housing complaints filed within the City of Goldsboro. Housing discrimination complaints were filed on the basis of race, disability, familial status, national origin, sex, and retaliation. In some cases, complaints were filed on more than one basis. For the period reviewed, the majority of complaints were based on disability (27.3%) alone. Another 27% of complaints were based on multiple allegations in a single complaint. The complaint data for Goldsboro is shown in Table 44.

Table 44. Fair Housing Cases 2009-2014 – Goldsboro, NC

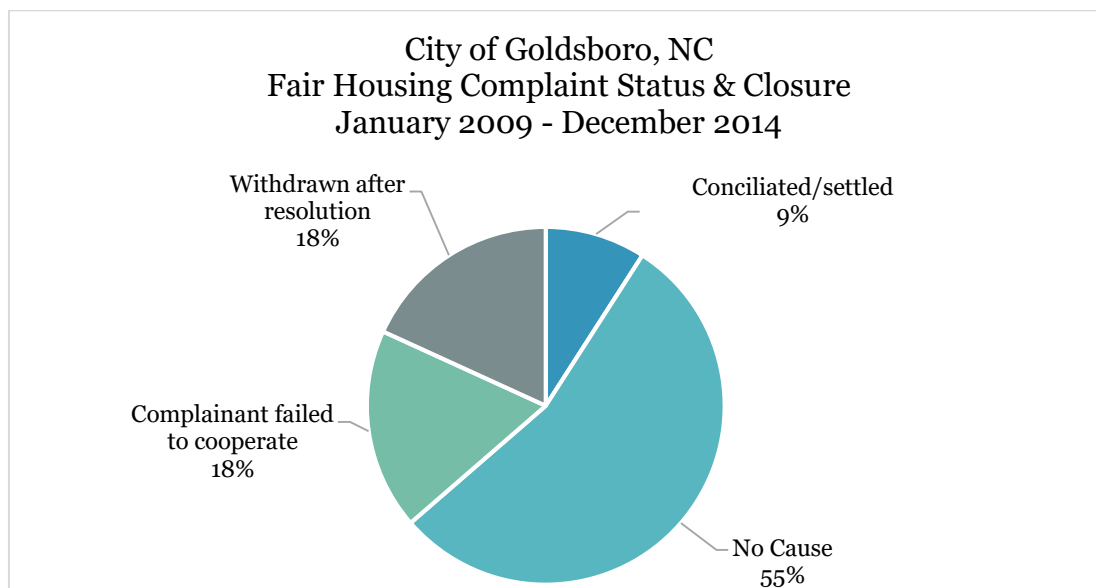
HUD Case No.	HUD Filing Date	Bases	Closure Reason	Closure Date
04-10-0044-8	10/9/09	Race	No Cause	6/1/10
04-09-1253-8	7/1/09	Race, Disability, Sex	Withdrawn after resolution	10/9/09
04-09-1100-8	6/26/09	Disability	No Cause	9/28/10
04-09-1268-8	7/2/09	Familial Status	Complainant failed to cooperate	2/24/10
04-09-1274-8	7/7/09	Sex	No Cause	3/22/10
04-11-1262-8	9/19/11	Race, Disability	No Cause	6/27/12
04-12-0523-8	3/22/12	National Origin	Complainant failed to cooperate	6/18/12
04-13-0373-8	2/5/13	Disability	Conciliated/Settled	6/28/13
04-13-0337-8	1/30/13	Race, Sex, Retaliation	No Cause	5/24/13
04-14-0167-8	12/12/13	Disability	Withdrawn after resolution	3/17/14
04-14-1050-8	9/11/14	Retaliation	No Cause	12/22/14

Source: U.S. HUD

The City's Community Affairs Department also received one fair housing discrimination complaint in FY 20011-2012 on the basis of race. The complaint was filed against the Eastern Carolina Regional Housing Authority and alleged that there were racial slurs on the walls of the apartment, there was a refusal by management to make repairs when requested, the resident was denied transfer to another development, and police refusal to answer call. The case was resolved with the resident being relocated to Jacksonville, N.C. per their request.

In reviewing closed cases, it is important to assess how cases were resolved. Of the 11 complaints, one case was conciliated/settled; two were withdrawn after resolution; two of the complainants failed to cooperate; and six were found to have no cause.

Figure 9. Disposition of Housing Discrimination Cases 2009-2014 – Goldsboro, NC



LEGAL CASES

As part of the fair housing analysis, research was conducted on recent legal cases were reviewed to determine significant fair housing issues in the City of Goldsboro. The purpose of the case analysis is to understand fair housing issues and challenges and to identify possible impediments or barriers to fair housing choice in the region. Information was gathered from court documents and rulings, newspaper articles, and press announcements. The review provides a summary of the case highlights as it relates to fair housing. There were no specific legal cases identified in the City of Goldsboro but the following are cases from nearby cities that have implications for fair housing in the City.

1. Washington, NC: Lawsuit filed against William I. Cochran and three related corporate entities – EKP LLC, WRC LLC and Emlan Properties LLC by the United States Department of Justice. September 25, 2012, U.S. District Court for the Eastern District of North Carolina

The lawsuit was filed based on an investigation against the owners and managers of a number of rental homes alleging that apartment manager William I. Cochran III discriminated against African American

tenants. According to the press release issued by the DOJ, *the complaint alleges that Cochran delayed or refused to perform maintenance or repairs at properties rented by African-Americans and refused to credit them for repairs they paid for or made themselves; verbally harassed African-American tenants with racial slurs and epithets, having made statements indicating that he disfavored African-American tenants; and threatened, harassed and retaliated against African-American tenants who resisted his discriminatory housing practices.*" The lawsuit seeks an order prohibiting the defendants from engaging in future unlawful discrimination, and requiring the defendants to pay monetary damages to victims of their discrimination and civil penalties to the government.¹⁰

2. Pelham, NC: Lawsuit filed against John Sylvania Matthews III by Housing Opportunities Made Equal, September 2013

On April 10, 2014, a Virginia landlord with property in Pelham, NC, was ordered to pay \$36,000 for discriminating against prospective African American tenants. The landlord, John Sylvania Matthews, III, resides in Danville, VA, and rents property in both Virginia and North Carolina.

An African American woman called him about a property advertised for rent. She was told that the property had already been rented, although a white applicant who that same day called about the unit was told that it was still available. Housing Opportunities Made Equal, a fair housing organization based in Richmond, VA, conducted fair housing testing and confirmed that the landlord was treating people differently based on race. A white tester was told the unit was ready and in a good neighborhood." However, according to a press release issued by HOME, Mr. Matthews *discouraged the African-American tester from renting the same property. He then steered her to other properties that were not yet available as he was still cleaning them out because "a bunch of damn n***** were living in 'em."*

Mr. Matthews was found to have violated the federal Fair Housing Act by refusing to negotiate with someone based on their race and by making statements indicating a preference or limitation based on race. The court ordered Mr. Matthews to pay damages of \$25,000, as well as \$11,000 attorney's fees for his actions. The separate case brought by the prospective tenant remains pending.¹¹

The above cases demonstrate that there is a need for fair housing education and awareness on the part of tenants and home buyers in seeking housing and testing and enforcement where necessary for landlords and other housing providers.

TREATMENT OF FORECLOSURE

For analysis of foreclosure impacts in Goldsboro, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. Data included homes in pre-foreclosure, at auction, and bank-owned (REO) properties representing current data or data recorded as of May 2015.

According to RealtyTrac, one out of every 1,458 homes in Goldsboro was under foreclosure in May 2015. RealtyTrac further analyzes foreclosures according to zip code within the City of Goldsboro. In May 2015,

¹⁰ Fair Housing Project, A project of Legal Aid of North Carolina website, <http://www.fairhousingnc.org/2012/doj-sues-north-carolina-landlord-for-race-discrimination/> Accessed June 30, 2015

¹¹ Fair Housing Project, A project of Legal Aid of North Carolina website, <http://www.fairhousingnc.org/2014/pelham-nc-landlord-order-to-pay-36000-for-race-discrimination/>

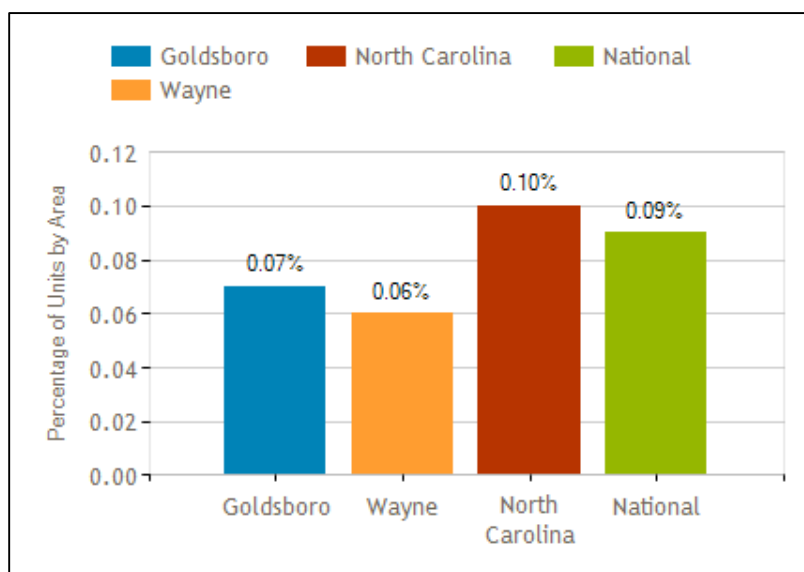
Analysis of Impediments to Fair Housing Choice, FY 2015-2019

City of Goldsboro, NC

the zip codes with the highest foreclosure rate were one in every 1,122 homes in zip code 27530 and one in every 2,825 homes in zip code 27534.

RealtyTrac provides a geographical comparison of foreclosures within the city, county, state, and on the national level. Figure 10 shows that the City of Goldsboro's rate of foreclosure (0.07%) is higher than that of Wayne County (0.06%), but lower than the state rate (0.10%), and the national rate (0.09%).

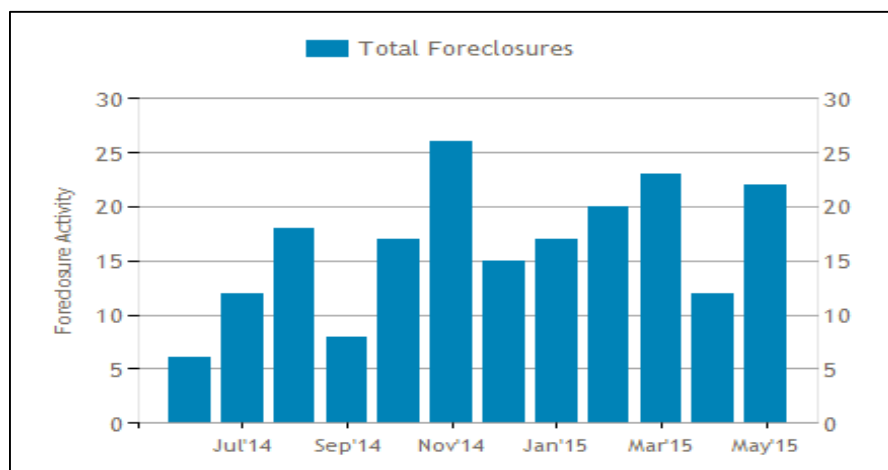
Figure 10. Foreclosure Rate Comparison for Goldsboro, Wayne County, North Carolina, and United States



Source: RealtyTrac, 2015

RealtyTrac shows that the number of foreclosures within Goldsboro has varied over the last year. The following figure shows foreclosure activity between June 2014 and May 2015. The number of foreclosures peaked in November 2014 and the lowest point occurred in May 2015.

Figure 11. New Foreclosure Activity – Goldsboro, NC



Source: RealtyTrac, 2015

According to RealtyTrac, there are currently 90 properties in Goldsboro that are in some stage of foreclosure (default, auction or bank owned) while the number of homes listed for sale on RealtyTrac is 424. In May 2015, the number of properties that received a foreclosure filing in Goldsboro was 83% higher than the previous month and 633% higher than the same time last year. RealtyTrac shows that all current foreclosure properties are either in pre-foreclosure, bank owned, or at auction status. Foreclosures in auction status represent 40.9% of the active foreclosure homes in Goldsboro, followed by pre-foreclosures with 36.4%, and bank-owned foreclosure properties account for 22.7%. Bank-owned foreclosures has increased at the greater rate, up by 400% from the prior year and up 150% from the prior month. The number of foreclosed properties up for auction increased by 350% from the prior year and is 125% higher than the prior month. Pre-foreclosure units remained constant since the prior year and grew by 33.3% from the prior month.

Of the foreclosure properties available in the Goldsboro market, the highest availability of properties occurs with those that are 1,600-1,799 square feet (7 properties), 3-bedrooms (27 properties), and built between 1990 and 1999 (10 properties).

In regards to fair housing, foreclosure rates are analyzed to determine if the foreclosures are a result of predatory or abusive lending practices and the impact of foreclosures on communities. Foreclosures can have an effect on homeowners, renters, banks and financial institutions, neighborhoods, and government. Homeowners and renters are more directly impacted because persons who lose their homes or are evicted due to foreclosure will need to change their living situation and may even become homeless. The effect on neighborhoods can be far reaching including blight due to abandoned and deteriorated properties, decline in property values, crime, and decrease in availability of public services.

Signs of predatory lending include high fees and inflated interest rates such as those charged on subprime loans. The North Carolina Center for Responsible Lending published a 2008 report titled *Subprime Spillover: Foreclosure Cost North Carolina Neighbors \$861 Million*¹². According to this report, for home loans originated in 2005 and 2006 in Wayne County, 579 homes were lost to foreclosure and 2,291 neighboring homes experienced devaluation. The average decrease per housing unit affected was \$1,700 for a total decrease in tax base of \$3.9 million.

According to the Center for Responsible Lending, North Carolina was the first state to enact legislation to curb predatory mortgage lending in 1999. A report published in 2002 titled *North Carolina's Subprime Home Loan Market after Predatory Lending Reform* found that North Carolina was the sixth most active state for subprime lending in 2000. The study also found that by enacting the new legislation, predatory terms were prevented on 31,500 subprime loans that saved borrowers at least \$100 million.

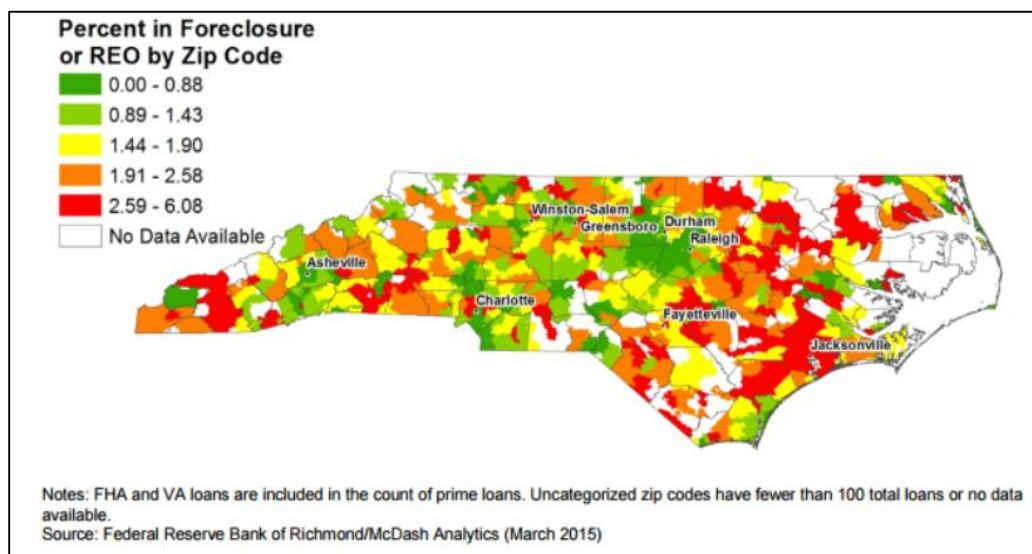
More recent data from the Federal Reserve Bank of Richmond which publishes the Housing Market and Mortgage Performance in the Fifth District¹³ (Mortgage Performance Summary) found that for the 1st Quarter of 2015, the foreclosure rate for the State of North Carolina was relatively low. According to the

¹² <http://www.responsiblelending.org/north-carolina/nc-mortgage/research-analysis/subprime-spillover-foreclosures-cost-north-carolina-neighbors-861-million.html>

¹³ https://www.richmondfed.org/-/media/richmondfedorg/community_development/resource_centers/foreclosure/research_and_pubs/mortgage_performance_summaries/nc/pdf/mortgage_performance_nc_2015q1.pdf

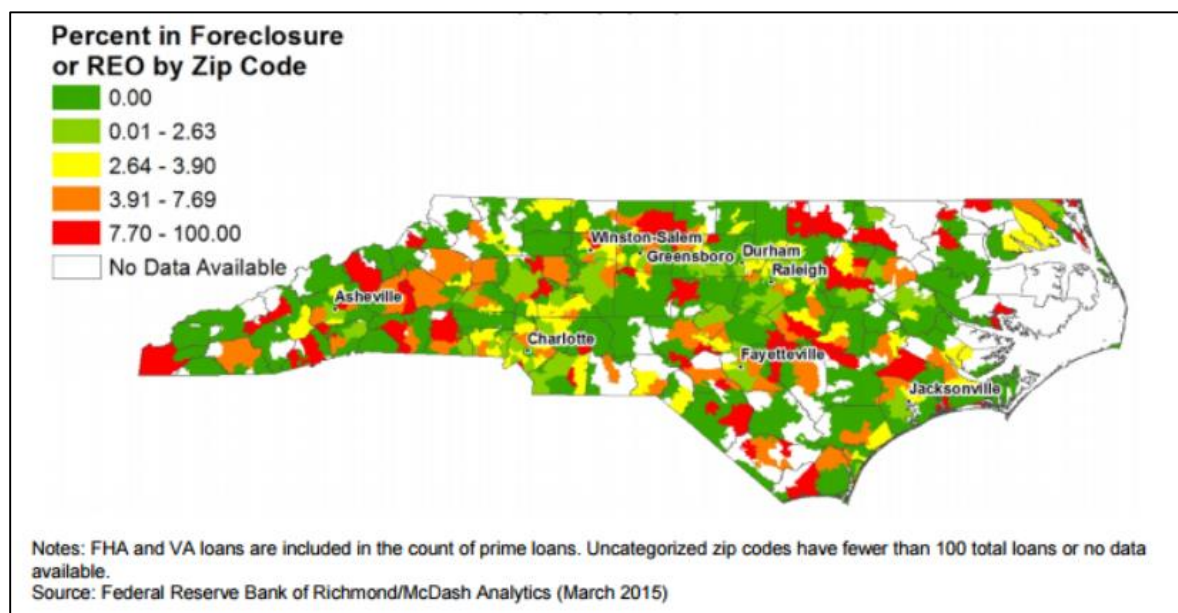
report, North Carolina was ranked 33rd in the nation with 1.33% of all units in foreclosure and 20th in the nation with 2.17% of units 90+ days past due. Figure 11 shows the percentage of owner-occupied loans in foreclosure or REO in North Carolina by zip code.

Figure 12. Owner-Occupied Loans in Foreclosure or REO – North Carolina



Approximately 7% of all loans in North Carolina were subprime loans (39th in the nation). The rate of foreclosure for subprime loans was higher than all loans, including prime loans and FHA and VA loans. In North Carolina, 5.3% of units financed with subprime loans were in foreclosure (30th in the nation) and 8.6% of these units were 90+ days past due (12th in the nation). Figure 13 shows the percentage of owner-occupied subprime loans in foreclosure or REO in North Carolina by zip code.

Figure 13. Owner-Occupied Subprime Loans in Foreclosure or REO – North Carolina



According to the Mortgage Performance Summary for Goldsboro, 97.1% of owner-occupied units with a mortgage were prime loans and 2.9% were subprime loans. As of March 2015, 1.04% of all owner-occupied prime loans in Goldsboro were in foreclosure, 2.6% were 90+ days past due, and 0.7% were REOs. For the same period, 1.2% of subprime loans were in foreclosure, 7.4% were 90+ days past dues, and 1.8% were in REOs.

Foreclosures can have an effect on homeowners, renters, banks and financial institutions, neighborhoods, and government. Homeowners and renters are more directly impacted because persons who lose their homes or are evicted due to foreclosure will need to change their living situation and may even become homeless. The effect on neighborhoods can be far reaching including blight due to abandoned and deteriorated properties, decline in property values, crime, and decrease in availability of public services.

In regards to fair housing, foreclosure rates can be analyzed to determine if the reasons for foreclosures include discriminatory practices. The National Fair Housing Alliance (NFHA) published a 2014 report titled, *Zip Code Inequality: Discrimination by Banks in the Maintenance of Homes in Neighborhoods of Color*¹⁴. NFHA conducted a nationwide examination of Real Estate Owned (REO) maintenance and marketing practices of major lenders and Fannie Mae over the last five years. The examination considered several aspects of maintenance and marketing including curb appeal, structure, signage, and indications of water damage, condition of paint, siding, and gutters. NFHA worked with 17 partners to gather data. The examination was conducted in 29 metropolitan areas between April 2012 and December 2013. The results for all the areas are summarized below:

- REOs in communities of color were 2.2 times more likely to have significant amounts of trash and debris on the premises than REO properties in White communities.
- REOs in communities of color were 2.3 times more likely to have unsecured, broken, or damaged doors than REOs in White communities.
- REOs in communities of color were 2.0 times more likely to have damaged, broken, or boarded windows than REO homes in White communities.
- Holes in the structure of the REO were 2.1 times more likely in communities of color than in White communities.
- REO properties in communities of color were 1.3 times more likely to have no professional “for sale” sign than REO homes in White communities.

HMDA DATA ANALYSIS

Introduction

This section contains an analysis of Home Mortgage Disclosure Act (HMDA) data for the City of Goldsboro. HMDA was enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C. This regulation provides the public loan data that can be used to assist in determining

¹⁴ National Fair Housing Alliance, *Zip Code Inequality: Discrimination by Banks in the Maintenance of Homes in Neighborhoods of Color*. Published August 27, 2014 http://www.mvfairhousing.com/pdfs/2014-08-27_NFHA_REO_report.PDF

whether financial institutions are serving the housing needs of their communities; public officials are distributing public-sector investments so as to attract private investment to areas where it is needed; and possible discriminatory lending patterns can be identified.

Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and with retrieval software on compact disk. Data can be retrieved or ordered at their website <http://www.ffiec.gov/hmda/hmdaproducts.htm>. The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose.

HMDA data consist of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contain information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location within areas of racial/ethnic and income distinction for loans for one to four family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

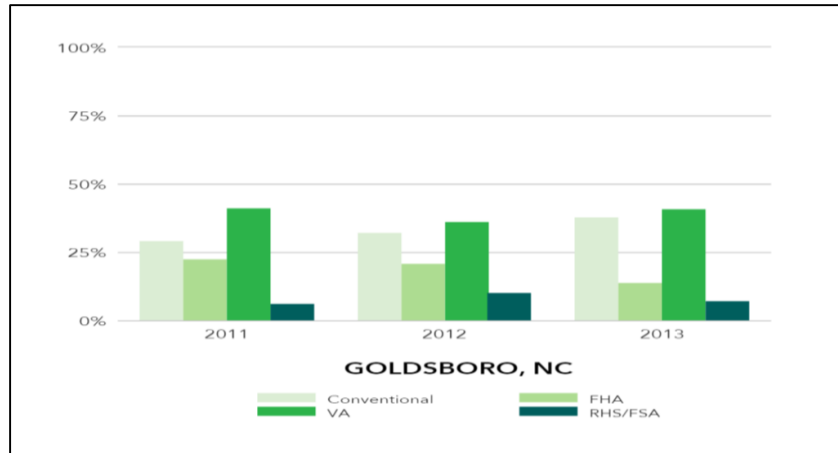
It should be noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data for the three-year period, 2011-2013, were used (extracted from HMDA Flat Files, 2011-2013).

Loan Originations and Denials Analysis

This section examines originations (the number of applications that result in loans being made) and denial rates broken down by race/ethnicity. There are four classifications for loan type: conventional, FHA, VA loans, and RHS/FSA. Conventional loans are loans that are not guaranteed or insured by the federal government under the Veterans Administration (VA), the Federal Housing Administration (FHA), or the Rural Housing Service (RHS) of the U.S. Department of Agriculture. FHA and VA loans are backed by the government, meaning that the FHA or the Department of Veteran's Affairs promises to pay lenders if a borrower defaults on the loan. Borrowers must meet certain requirements to be eligible for each loan type.

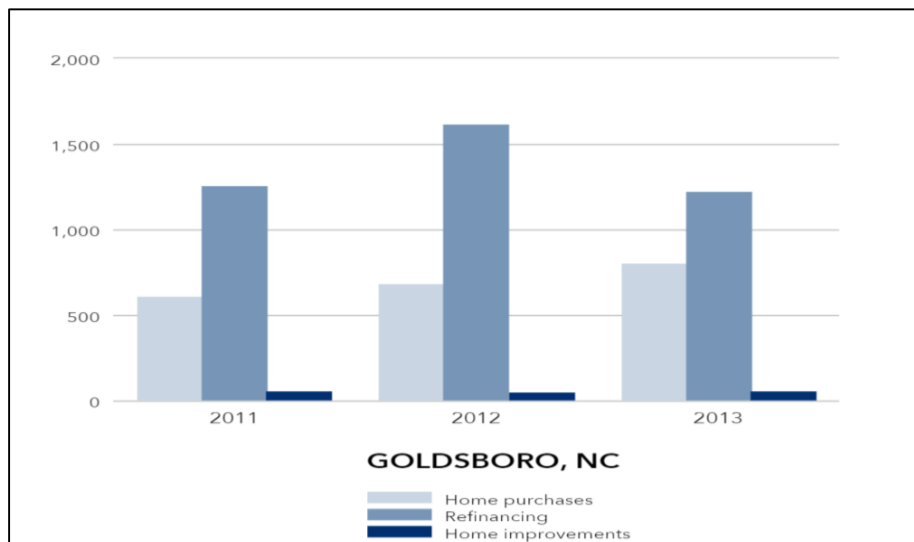
There were 8,584 loan applications submitted in Goldsboro between 2011 and 2013. Of this total, 4,773 (55.6%) were originated and 649 (19.2%) of all applications were denied. Of the 8,584 loan applications, 4,758 (55.4%) were conventional loans, 2,446 (28.5%) were VA loans, 1,212 (14.6%) were FHA loans, and 168 (2.0%) were FSA. The origination rate ranged from 41.3% for FHA loans to 66.1% for FSA loans. Conventional loans and VA loans which represented the greatest number of applications had an origination rate of 53.9% and 65.3%, respectively. The loan denial rate for conventional loans was 25.1%, 18.4% for FHA loans, 8.9% for VA loans, and 7.7% for FSA loans. Figure 14 shows application trends between 2011 and 2013 by loan type.

Figure 14. Percentage of home purchases by loan type – Goldsboro, NC



When broken down by loan purpose, the majority of the applications were for refinance loans (62.1%), followed by home purchase loans (31.8%), and home improvement loans (6.1%). Refinance loans had the highest origination rate (57.1%) and the lowest denial rate (16.6%). Home purchase loans had an origination rate of 55.3% and a denial rate of 19.3%. Home improvement loans had a 42.1% origination rate and a 45.2% denial rate however these figures are skewed since home improvement loans represent a small share of the total applications. Figure 15 shows application trends between 2011 and 2013 by loan purpose.

Figure 15. Mortgage volume – Goldsboro, NC



Among racial and ethnic groups, 58.7% of applicants were White (not Hispanic), 18.7% were Black or African American, and 2.8% were Hispanic. Other minority groups including American Indian or Alaska Natives, Asians, and Native Hawaiian and Pacific Islanders made up a small segment of all applicants at 1.8%.

Analysis of Impediments to Fair Housing Choice, FY 2015-2019

City of Goldsboro, NC

Loan origination rates were highest among White applicants at 66.2%, followed by Hispanics at 57.4%, and Black or African Americans at 51.8%. Denial rates were highest for Hispanic applicants (27.1%) and Black or African American applicants had a denial rate of 26.8%. White applicants had the lowest denial rates at 15.5%. The denial rates for the other minority groups ranged from 18.2% to 42.3% however these rates are based on a relatively small number of applicants. Overall, Black or African American and Hispanic applicants had a lower origination rate and a higher denial rate than White applicants.

Table 45 below breaks down loan origination and denial rates by the four loan types, by race and ethnicity, and by loan purpose.

Table 45. Loan Approval and Denial Rates by Loan Source and Race/Ethnicity (2001-2013) – Goldsboro, NC

Home Mortgage Disclosure Act (HMDA) Analysis Comparison of Originations Within Categories Goldsboro, NC 2011-2013					
	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Loan Type					
Conventional	4,758	2,565	53.9%	1,195	25.1%
FHA	1,212	500	41.3%	223	18.4%
VA	2,446	1,597	65.3%	218	8.9%
FSA	168	111	66.1%	13	7.7%
	8,584	4,773		1,649	
	Number of Applications	Number of Originations	Origination Rate	Number of Denials	Denial Rate
Race & Ethnicity					
White (Not Hispanic)	5,040	3,337	66.2%	782	15.5%
White (Hispanic)	164	98	59.8%	44	26.8%
Black or African-American (Not Hispanic)	1,603	831	51.8%	405	25.3%
Black (Hispanic)	16	5	31.3%	6	37.5%
American Indian or Alaska Native (Not Hispanic)	26	7	26.9%	11	42.3%
American Indian or Alaska Native (Hispanic)	5	2	40.0%	1	20.0%
Asian (Not Hispanic)	103	64	62.1%	19	18.4%
Asian (Hispanic)	1	1	100.0%	0	0.0%

Home Mortgage Disclosure Act (HMDA) Analysis Comparison of Originations Within Categories Goldsboro, NC 2011-2013					
Native Hawaiian and Pacific Islander (Not Hispanic)	22	12	54.5%	4	18.2%
Native Hawaiian and Pacific Islander (Hispanic)	2	2	100.0%	0	0.0%
Race Not Provided (Not Hispanic)	81	40	49.4%	17	21.0%
Race Not Provided (Hispanic)	49	16	32.7%	21	42.9%
Not Applicable	1,472	358	24.3%	339	23.0%
	8,584	4,773		1,649	
	Number of Applications	Number of Originations	Percent of Originations	Number of Denials	Denial Rate
Loan Purpose					
Home Purchase	2,729	1,509	55.3%	527	19.3%
Home Improvement	527	222	42.1%	238	45.2%
Refinance	5,328	3,042	57.1%	884	16.6%

Loan Application Analysis by Census Tract

The HMDA analysis focuses on 20 census tracts that are entirely within the corporate limits of the City of Goldsboro. In 2011-2013, 8,584 total applications were submitted with 2,127 (24.8%) of them coming from minority applicants. Of the minority applications, 600 (28.2%) of those applications were denied compared to a 19.2% denial rate for all applications and a 15.5% denial rate for White applicants. There is a 12.7% disparity between the denial rate for minority and non-minority applicants indicating that applications from minorities are disproportionately denied.

Of the 20 census tracts, 19 (95%) had a higher minority denial rate than the total application denial rate of their respective tract. Of the 19 census tracts with higher minority denial rates, 7 (36.8%) of them met the definition of “minority” tracts (census tracts 6.02; 12; 14; 15; 18; 19; and 20). For purposes of this analysis, a “minority” tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Goldsboro as a whole (45.7% based on FFIEC Census data). Therefore, tracts with a 50.7% or greater minority population would be considered a “minority” tract. All seven minority tracts had higher minority applicant denial rates than that of the overall denial rates. Table 46 below shows a breakdown of the total denial rate and the minority denial rate of all Goldsboro census tracts.

Table 46. Total and Minority Applications and Denial Rates (2011-2013) – Goldsboro, NC

Goldsboro Total and Minority Applications and Denial Rates (2011-2013)										
Census Tracts	Total Applications	Total App Denials	Total App Denial Rate	Total Hispanic Applications	Total Minority Applications (Not Including Hispanic)	Total Hispanic Denials	Total Minority Denials (Not Including Hispanic)	Total Hispanic Denial Rate	Total Minority Denial Rate	Tract Minority %
1.02	1075	149	13.9%	22	147	2	28	9.1%	19.0%	20.68
3.02	810	122	15.1%	11	247	5	40	45.5%	16.2%	46.75
4.02	271	58	21.4%	10	55	2	15	20.0%	27.3%	45.84
5.00	65	50	76.9%	2	27	2	23	100.0%	85.2%	33.85
6.02	473	122	25.8%	34	68	16	24	47.1%	35.3%	58.1
11.02	387	76	19.6%	9	56	6	14	66.7%	25.0%	23.52
12.00	440	101	23.0%	11	123	3	42	27.3%	34.1%	52.6
13.01	575	89	15.5%	14	181	3	35	21.4%	19.3%	49.18
13.02	236	42	17.8%	5	41	1	10	20.0%	24.4%	37.25
14.00	614	160	26.1%	12	257	4	80	33.3%	31.1%	80.27
15.00	125	42	33.6%	1	81	0	31	0.0%	38.3%	90.72
18.00	102	29	28.4%	0	46	0	17	0.0%	37.0%	83.1
19.00	320	65	20.3%	10	82	2	25	20.0%	30.5%	67.02
3.03	712	103	14.5%	19	114	6	28	31.6%	24.6%	27.6
3.04	495	91	18.4%	10	70	3	18	30.0%	25.7%	23.32
4.01	656	78	11.9%	26	82	7	15	26.9%	18.3%	30.4
9.01	329	66	20.1%	13	46	1	9	7.7%	19.6%	42.66
9.02	310	84	27.1%	15	83	4	40	26.7%	48.2%	50.66
11.01	536	105	19.6%	13	68	5	18	38.5%	26.5%	24.63
20.00	53	17	32.1%	0	16	0	16	0.0%	100.0%	87.37

Analysis of Tracts by Income Characteristics

Table 47 breaks down the median income category for the 20 Goldsboro census tracts. The table notes that 15 census tracts within the City of Goldsboro are middle income tracts that is, those with a median income of >80%). Three of these tracts, census tracts 6.02, 12, and 19, are minority tracts. Of the census tracts that met HUD's definition of low- and moderate-income (less than 80% AMI) Goldsboro had a total of 5 tracts, four of which are minority census tracts.

Table 47. Total Median Income Categories for All Census Tracts (2011-2013) – Goldsboro, NC

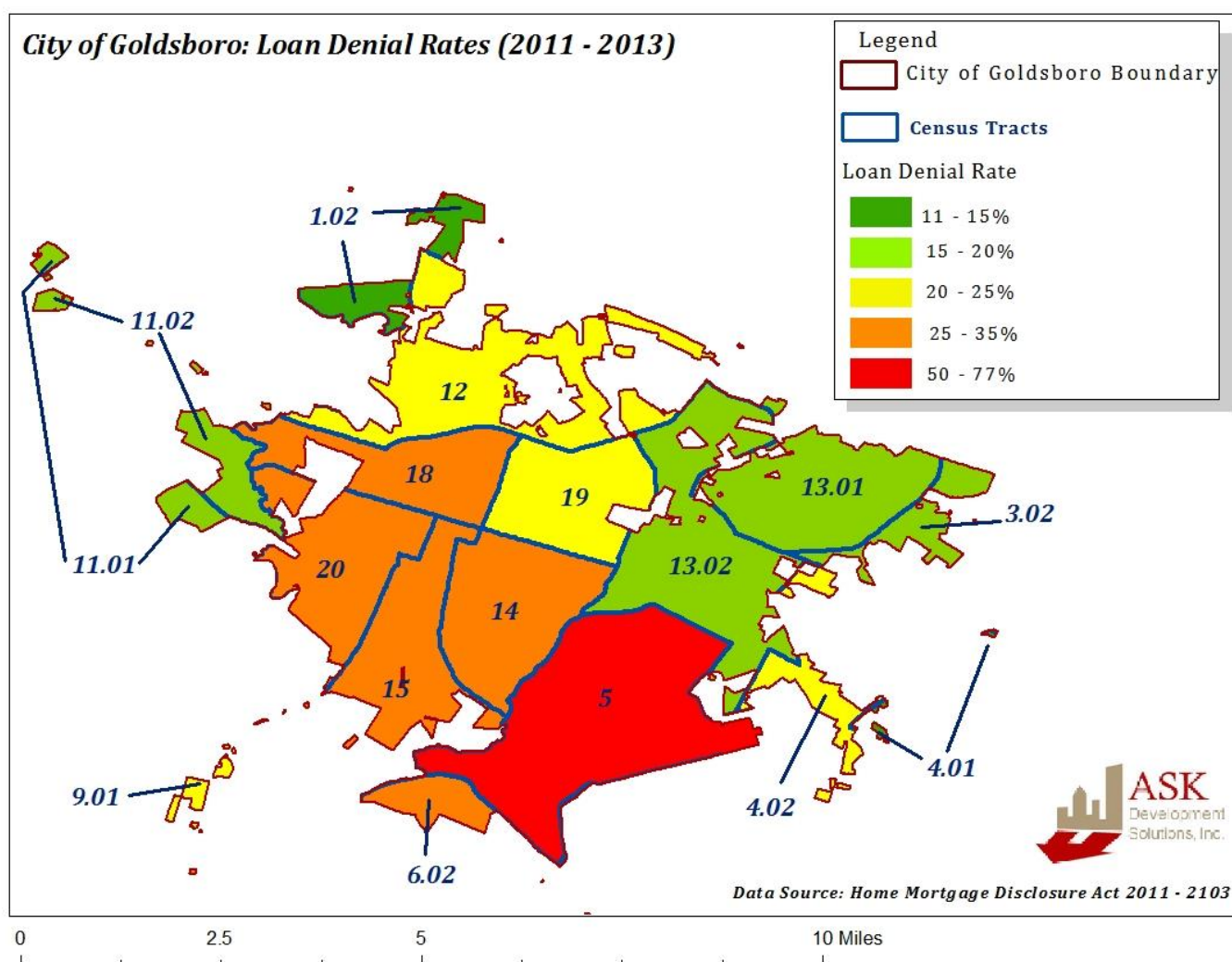
Census Tract	Tract Median Family Income %	Tract Income Level	Total App Denial Rate %	Total Minority Denial Rate %
1.02	155	Upper	13.9%	19.0%
3.02	98.45	Middle	15.1%	16.2%
4.02	87.07	Middle	21.4%	27.3%
5.00	72.14	Moderate	76.9%	85.2%
6.02	96.71	Middle	25.8%	35.3%
11.02	134.25	Upper	19.6%	25.0%
12.00	100.58	Middle	23.0%	34.1%
13.01	136.35	Upper	15.5%	19.3%
13.02	118.06	Middle	17.8%	24.4%
14.00	76.68	Moderate	26.1%	31.1%
15.00	67.45	Moderate	33.6%	38.3%
18.00	38.5	Low	28.4%	37.0%
19.00	81.31	Middle	20.3%	30.5%
3.03	124.64	Upper	14.5%	24.6%
3.04	114.88	Middle	18.4%	25.7%
4.01	139.06	Upper	11.9%	18.3%
9.01	111.85	Middle	20.1%	19.6%
9.02	81.95	Middle	27.1%	48.2%
11.01	100.4	Middle	19.6%	26.5%
20.00	63.91	Moderate	32.1%	100.0%

The HMDA data can be used to analyze any connection between denial rates and median income. Of the 15 middle income census tracts, 14 tracts have a higher minority applicant denial rate than that of the overall tract denial rate. The largest disparity is in census tract 1.02 where the overall denial rate is 32.1% but the minority denial rate is 100%. This data could be skewed since only 15.7% of the applications in this census tract are minority applications. However, the middle income tract with the highest percentage of

minority applications, census tract 13.0, exhibits the second largest disparity between minority denial rate and overall denial rate (21.1%), indicating that higher income applicants still face hurdles in qualifying for loans and higher income minority households are still disproportionately affected when it comes to being able to qualify for a loan.

Of the five tracts with median incomes that fell below 80% of their MSA, all of the tracts had a higher minority applicant denial rate than that of the overall denial rate for their tract. The overall denial rate within these five tracts was 31.1% compared to a minority denial rate of 39.1%. Therefore, minority applicants are also denied loans at a greater rate in low-and moderate income census tracts. Map 10 shows the loan denial rates by census tracts and indicates that the highest percentages of denials (25-77%) occur in census tracts 5, 6.02, 14, 15, 18, and 19, all of which have minority over 50% minority residents with the exception of census tract 5, as shown on Map 11.

Map 10. Loan Denial Rates – Goldsboro, NC



Map 11. Loan Denial Rates by Percent Minority Residents – Goldsboro, NC

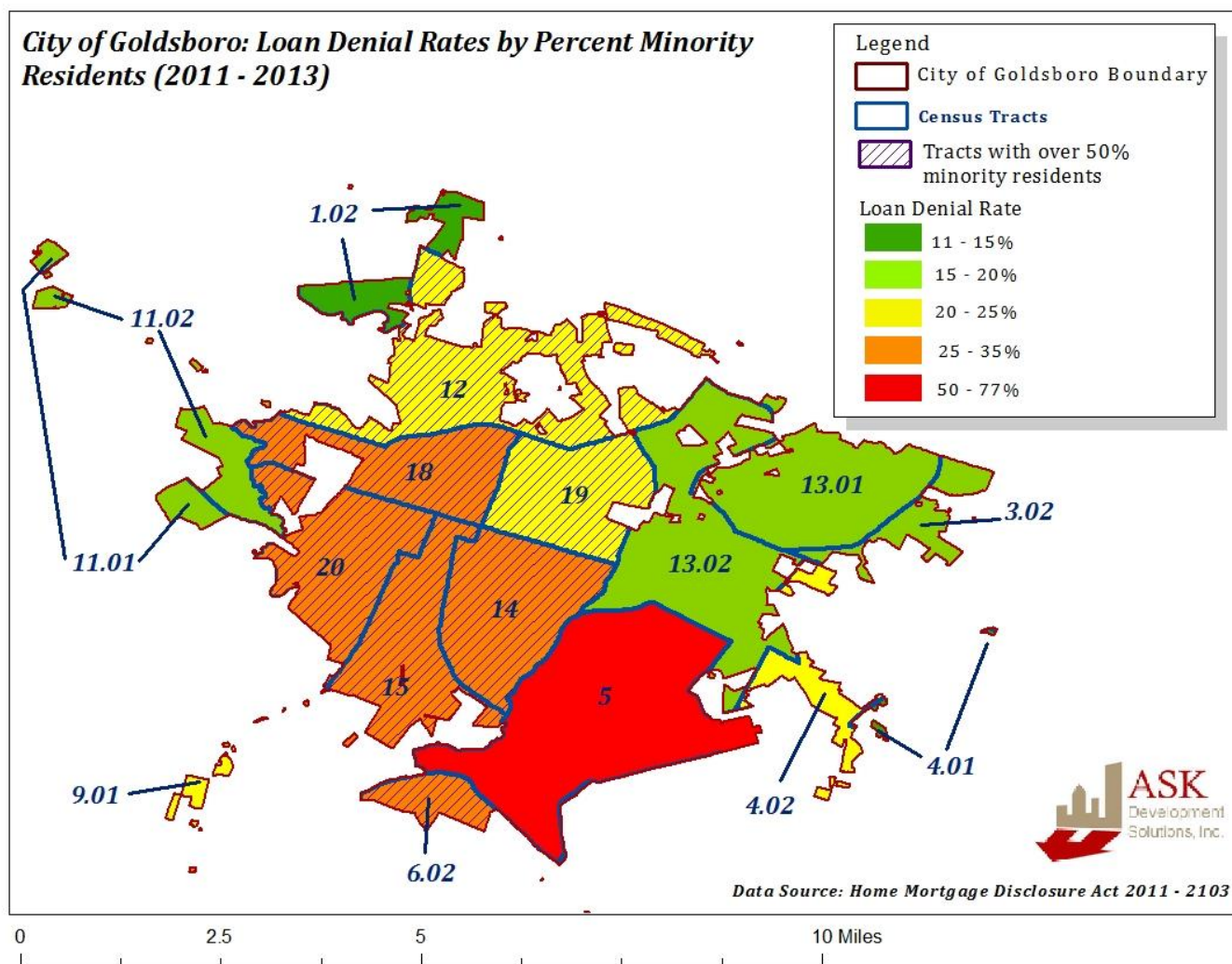
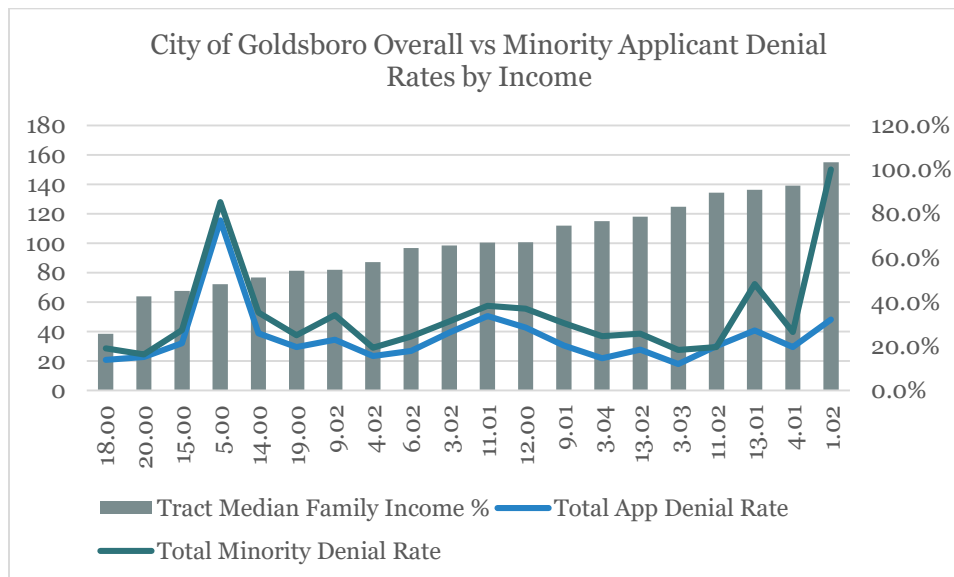


Figure 16 shows a comparison of all 20 Goldsboro census tracts and the trend of higher denial rate for minorities can be seen across all tracts when using median income as the main comparison. The data shows that regardless of income level in the census tract, minority application denial rates are still higher than non-minority denial rates with the biggest differences occurring in middle income tracts.

Figure 16. Overall vs Minority Applicant Denial Rates by Income – Goldsboro, NC



This review of the HMDA data suggests that there may be discriminatory lending practices occurring in Goldsboro based on race and ethnicity. To make a definitive conclusion would require a greater degree of analysis taking into consideration other variables and characteristics that may be affecting the results including the reason for the denials.

This review of the HMDA data suggests that there may be discriminatory lending based on race/ethnicity. As mentioned before, to make a definitive conclusion would require a greater degree of analysis taking into consideration other variables and characteristics that may be affecting the results.

CITY REGULATORY REVIEW

This Section focuses on the review of the local public sector policies to determine if such policies affect housing choice by limiting or excluding dwellings or housing facilities for persons with disabilities or other protected class members from certain residential areas. HUD believes that there are instances where policies have the effect of violating the provisions of the Fair Housing Act since they may indirectly discriminate against members of the protected classes such as persons with disabilities and racial and ethnic minorities. Under the current state of the law, a local government cannot adopt ordinances or other regulations based on race, ethnicity, or national origin, even if for their benefit, unless the ordinance or regulation are justified by a compelling governmental interest and are narrowly tailored to further that interest. However, laws and ordinances may have disparate impact on protected class members.

In order to make this determination, the City of Goldsboro's Comprehensive Plan, *Envision 35 Goldsboro's Urbanized Area Comprehensive Plan*¹⁵, the Goldsboro Downtown Master Plan¹⁶, the Goldsboro Code of Ordinances¹⁷, and the City's Unified Development Ordinance¹⁸ were reviewed. In addition to the review of these adopted policies and plans, a self-assessment questionnaire was completed by the Planning staff. The purpose of the questionnaire was to review public policies and practices concerning the Zoning Code and Comprehensive Plan as it relates to fair housing choices, particularly housing for persons with disabilities. A copy of the planning and zoning questionnaire is attached as Appendix I. The following information was garnered from the examination undertaken and the questionnaire.

Review of the Envision 35 Plan

A comprehensive plan is defined as a long-term guide for the development of a community outlining existing conditions and providing goals, policies, and actions to meet future needs as determined by factors such as population, economic conditions, and impacts of regional change. Comprehensive plans are typically developed with input from stakeholders in the community and function as a living document used in the decision making process for current and future community leaders. A comprehensive plan provides guidance for the City's future in regards to the type and intensity of development, land uses, and open space.

Envision 35 was adopted in May 2013 and is a 20-year plan for the Goldsboro Urbanized Area. The Goldsboro Urbanized Area includes the City of Goldsboro, its extraterritorial jurisdiction (ETJ), and an area of unincorporated Wayne County. The plan addresses among other areas: the provision of historical, current, and forecast data with regards to demographics; an assessment of the current housing concerns; and a review of the current issues facing transportation, housing, and physical conditions.

Based on input received from the public and stakeholders during the planning process, the City developed its vision statement, "The Goldsboro Urbanized Area will be a regional community of attractive residential neighborhoods that promotes active living and a diversified local economy anchored by a strong military presence, while preserving its agricultural heritage and protecting important natural, cultural, and historic assets.

The purpose of reviewing the City's Comprehensive Plan is to identify to what extent the Envision 35 helps the City to implement its commitment to equal housing opportunity and to what extent portions of the Plan may serve as impediments to fair housing choice for persons protected by the FHA. As such, the review covers six subject areas selected because of their correlation with fair housing choice. These areas are:

¹⁵ http://www.ci.goldsboro.nc.us/documents/planning/comprehensive_plan.pdf

¹⁶ http://www.dgdc.org/documents/GoldsboroFinal_HQ.pdf

¹⁷ [http://www.amlegal.com/nxt/gateway.dll/North%20Carolina/goldsbor/cityofgoldsboronorthcarolinacodeofordina?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:goldsboro_nc](http://www.amlegal.com/nxt/gateway.dll/North%20Carolina/goldsbor/cityofgoldsboronorthcarolinacodeofordina?f=templates$fn=default.htm$3.0$vid=amlegal:goldsboro_nc)

¹⁸ http://www.ci.goldsboro.nc.us/zoning_code.aspx

Analysis of Impediments to Fair Housing Choice, FY 2015-2019
City of Goldsboro, NC

1. Inclusion of Protected Group Demographic Description
2. Plans for Affordable Housing/Diverse Community
3. Reference to CDBG or Other Federal Housing Programs
4. Affirmatively Furthering Fair Housing
5. Compliance with Applicable Laws and Regulations
6. Community Participation in the Planning Process

1. Inclusion of Protected Group Demographic Description

Envision 35 includes a brief history of the City and its original inhabitants. According to the Comprehensive Plan, the City was originally occupied by Tuscarora Native Americans and was later settled by European immigrants in the 1740s. Some of the developments that led to population growth in Goldsboro and helped form the City as it is today was the Wilmington and Weldon Railroad in the early 1840s, agriculture during the 1800s, and the opening of the Seymour Johnson Air Force Base in 1942.

Envision 35 includes a community snapshot that covers the areas of population, housing, and the economy. The analysis of the population includes growth and age trends as well as changes in gender and racial composition. The plan identified an increase in the number of minority households, specifically Blacks or African Americans, and indicates that this segment of the City's population grew at a faster rate than Blacks or African Americans in the urbanized area and on national levels. The Black or African American population in Goldsboro experienced growth even when there was a decline in the growth rate at the state level. According to the Envision 35 there is a concentration of Black or African American persons in census tracts 14, 15, 16, 17, and 18. The Comprehensive Plan also includes population trends by sex. In regards to the elderly population, the City anticipates significant growth and projects that by 2030, more than 9% of the population will be over 85 years. The Plan does not contain data for other protected groups such as the number of persons with disabilities or data on number of households with children.

The Downtown Master Plan includes a demographic/economic overview and residential market analysis and while population trends were examined, it was not analyzed beyond the total population level and did not contain information on the demographic and socioeconomic characteristics of protected class members.

As a proactive and preventative approach, inclusion of information about race, national origin, familial status, or disability status of persons in a comprehensive plan is one way to help remind a community that it is composed of a significant number of persons who are most likely to need the protection of the FHA in their attempts to find or occupy housing in the community. Inclusion in the demographic profile can help ensure that protected group persons are not excluded or neglected when communities make plans that involve housing and community related issues. It is recommended that the City expand the demographic data in the Comprehensive Plan and other neighborhood planning documents.

2. Plans for Affordable Housing/Diverse Community

The Comprehensive Plan identified the following housing priorities which were adopted from the City's Consolidated Plan:

- Preservation of the City's existing housing stock.
- Increase homeownership assistance.
- Improve public facilities, including parks, within low- and moderate-income neighborhoods.
- Acquisition, demolition, and clearance of severely deteriorated housing.

The Plan includes policies for diverse housing types. Specifically, the Zoning Code includes regulations for Cluster Development or Residential Planned Unit Development (PUD) Option. According to the Zoning Code, “this type of development provides an alternative to standard residential development practices”.

In regards to affordable housing planning, the Comprehensive Plan points to the need for affordable housing based on the waiting lists for public housing and Section 8 vouchers and also the number of substandard housing units in the City. The plan also calls for the renovation and rehabilitation of housing in the Central Business District (CBD). The revitalization of the CBD is expounded on in the Downtown Master Plan which recognizes the importance of the restoration of historic homes and also the construction of market rate and affordable housing including townhouses, carriage houses, and medium-density apartments and condominiums.

The FHA does not mandate that communities plan for constructing or assisting in the construction of "affordable" housing nor require that communities be, or advertise themselves as, "diverse communities". However, HUD has recognized that inclusion of "affordable housing" and promotion of a community as a "diverse community" are steps that communities can take to "affirmatively further fair housing". Specifically, HUD requires that housing development activities not have an unjustified discriminatory effect. Racial minorities, some recent immigrants, single mothers with children, and persons with disabilities, all protected by the FHA, are over represented in the low- and moderate-income categories, and are among the persons most likely to need "affordable" housing. Taking steps to address the housing needs of lower income persons and to establish respect for a "diverse" community are therefore viewed by HUD as "affirmative fair housing actions".

Although the City recognizes the need for affordable housing, NIMBYism is still an issue among residents. Resistance to new or different housing is often referred to as “Not in my backyard” or NIMBYism. NIMBYism is based on the fear that the proposed housing is to be occupied by individuals in some way different from those already residing in the area. Stereotypes often get combined with fears such as loss in property values, attraction of crime, and substandard housing and results in neighborhood resistance. An article published in the Goldsboro News-Argus¹⁹ discussed a proposal from local developers for a 64-unit affordable housing development in downtown Goldsboro targeted to residents earning 60% of AMI. The City Council and City Administration seemed receptive to the project based on the quality of other projects constructed by the developer. However, in a subsequent article²⁰ the City Council decided not to take any action on the project after concerns a questions from business owners in the downtown area. This decision prevented the developers from seeking LIHTCs from the North Carolina Housing Finance Agency and has delayed the development of any new affordable housing units in Goldsboro for at least a year.

3. Reference to CDBG or Other Federal Housing Program

The Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) are federal housing and community development programs that provide funding to entitlement communities such as Goldsboro. The funds are allocated on an annual basis from HUD with the goal of principally benefitting low- and moderate-income persons. On the other hand, the HOME Program is designed exclusively to create affordable housing for low income households.

¹⁹ Smith, E. (2015, January 12). Housing complex planned for city. *Goldsboro News-Argus*.

²⁰ Smith, E. (2015, January 23). Council tables plan for complex. *Goldsboro News-Argus*, p. 1A, 2A.

This review is done to determine if the Comprehensive Plan and related documents include a reference to the existence and value of the CDBG and/or other Federal housing programs, as the City is a recipient of those funds. CDBG and other Federal housing program funds are reliable and important parts of the community development programs for communities throughout the nation, including the City of Goldsboro. Expected uses for CDBG funds can be incorporated into the planning process and can become reliable components of a Comprehensive Plan. Inclusion of references to CDBG and other Federal housing programs in master plans also serves as a way to inform residents of the valuable existing relationships and those that can be developed, between Local, State and Federal governments.

There was no reference to CDBG funds in Envision 35. However, the Downtown Master Plan did identify potential funding sources for the revitalization plan including TIF funds, bonds, CDBG, community reinvestment funds, and developer contributions.

4. Affirmatively Further Fair Housing

Each community that accepts Federal CDBG funds must certify that it will “affirmatively further fair housing” and will report to HUD the actions it has taken to implement the certification. The City of Goldsboro is a recipient of CDBG and HOME funds from the HUD and must take actions to implement the pledge. Preparation of an AI constitutes an action of the City to affirmatively further fair housing. To that end, the City has procured ASK Development Solutions to prepare an updated AI. The previous AI identified five fair housing impediments:

- i. Lack of Fair Housing Awareness and Education
- ii. Low Inventory of Housing for Disabled and other Special Populations
- iii. Affordability
- iv. Mortgage Financing and Disproportionate Number of Subprime Loans for Minority and Women
- v. Accessibility

To address these impediments, the City has funded the development of affordable housing through its CHDO and operated a homebuyer assistance program. According the FY 13-14 CAPER, the City has a Comprehensive Fair Housing Strategy with the goal of eliminating discrimination and unfair treatment in the provision of sale and rental housing. The City has also conducted several outreach and educational meetings with community groups, realtors, landlords, lenders, homebuyers, and tenants. The City will continue to take actions to address the impediments that are identified in this AI.

The Goldsboro Code of Ordinances discusses the establishment of the Goldsboro Commission of Community Affairs which among other duties, studies problems of discrimination to encourage fair treatment and mutual understanding among all social and ethnic groups in the City.

5. Compliance with Applicable Laws and Regulations

Fair Housing Rule: In July 2015, HUD released the final Affirmatively Furthering Fair Housing (AFFH) rule. The new rule proposes to incorporate fair housing planning into the Consolidated Plan and the Public Housing Authority (PHA) Annual Plan processes. When finalized, the new rule will incorporate fair housing priorities into housing, community development, land-use, and other policy making documents. The proposed changes came about as a result of a Report by the US Government Accountability Office where it was determined that HUD needs to enhance its requirements and oversight of jurisdictions’ fair housing plans. HUD’s Office of Fair Housing and Equal Opportunity (FHEO) oversees all fair housing matters including a jurisdiction’s compliance with the Affirmatively Further Fair Housing

(AFFH) certification, included in the Consolidated Plan and Action Plan. Should HUD determine that the AFFH is inaccurate, HUD has the authority to disapprove a Consolidated Plan, which may result in withholding CDBG and other formula grant funds until the AFFH matter is resolved. The FHEO administers, in addition to the Fair Housing Act, other fair housing and civil rights programs such as Title VI of the Civil Rights Act of 1964; Age Discrimination Act of 1975; Title II ADA; Section 3 of the HCD Act of 1968; and Section 504 of the Rehabilitation Act of 1973, as amended.

Accessibility: Chapter 11 of the 2012 North Carolina Building Code, Accessibility, addresses the design and construction of facilities for accessibility to persons with disabilities. Building and facilities are required to be designed and constructed to be accessible depending on the type of building and use. The Building Code also addresses accessible routes, accessible entrances, and accessible parking requirements.

Section 504: According to the City's 2015-2019 Consolidated Plan, the Goldsboro Housing Authority and the Eastern Carolina Regional Housing Authority have Section 504 accessible units within their housing developments and are in compliance with Section 504 UFAS accessibility requirements.

Section 3: The Section 3 Program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low or very low income residents in connection with projects and activities in their neighborhoods. The Section 3 program is coordinated with the City's Minority/Women Business Enterprise (MWBE) program office and offers equal opportunities to minority and women businesses in construction and related services. While the program offers a set aside for MWBEs, it is unclear how the City meets its Section 3 requirements regarding jobs to qualified persons especially persons in the City's Public Housing and Section 8 Voucher programs.

Minority/Women Business Enterprise (MWBE): According to the City's 2013-2014 Consolidated Annual Performance and Evaluation Report (CAPER), it is the City's policy to "provide minorities and women equal opportunity to participate in the programs and services offered by the City." The City Council adopted a Resolution establishing a verifiable goal of fifteen percent (**15%**) of the total dollar amount of all contracts for participation by minority and/or women's businesses in relation to contracts for CDBG and HOME Program activities. A cross-certification, single-form process was established to facilitate certification for those who may be eligible under both Section 3 and MWBE. The Community Development staff has compiled a list of minority and female contractors, subcontractors, and suppliers in our area and when advertising for bids on CDBG or HOME projects. The MBE/WBE program is coordinated with the City's M/WBE program office.

6. Community Participation in Planning Process

The Comprehensive Plan was developed with public input from the community generated from 18 committee work sessions with a 12-member Comprehensive Plan Advisory Committee (CPAC), a planning charrette, two (2) open house meetings for public review, a draft plan presentation to the CPAC, and a public hearing of the final plan. Envision 35 also includes recommendations for ongoing community input as follows:

- Encourage public participation in all land use decisions and procedure development processes.
- Publicize all meetings of the Planning Board and Board of Adjustments through newspaper advertisements and public service announcements.
- Utilize advisory committees to assess and advise the City on special planning issues and needs.

- All Planning Department activities should be available on the City's website.

The City of Goldsboro has several boards, committees, and commissions that relate to fair housing issues. Usually, each board requires members to meet specific qualifications and are generally appointed by Goldsboro City Council. Maintaining active boards and commissions allows residents of Goldsboro to have input on the programs and the actions of the City. Some of the City's board include but are not limited to:

Committee on Community Development – This board is comprised of 10 members and where possible, the majority of members are low- and moderate-income persons, minority persons, residents of an areas included within a proposed redevelopment area, elderly, disabled, part of the business community, or part of a civic group concerned with community development. The Advisory Committee on Community Development works with City staff to provide their views on specific issues and recommendations and advise and assist the Community Development Administrator on all projects.

Commission on Community Affairs - The Goldsboro Commission of Community Affairs assists in matters of public relations, civil rights, investigating discrimination complaints, advisory duties on matters involving social planning and assistance in community services, housing and expanding economic opportunities for persons of low-and-moderate income. The Commission also assists in providing aid relative to the elimination and prevention of blighted influences, rehabilitation to eliminate detrimental conditions to the health, safety and general welfare of the public, and the restoration and preservation of properties of special value.

Mayor's Committee for Persons with Disabilities – This board is comprised of 30 members recommended by local government, private and community organizations, and by other committee members. The committee is responsible for planning, conducting, and publicizing activities designed to promote employment and well-being of people with disabilities. To cooperate with community agencies and organizations in securing employment acceptance of people with disabilities; to stimulate community interest in furthering employment of people with disabilities by securing active cooperation and support from employers, employees, community groups, and the general public. Conducting specific activities of the Governor's Advocacy Council for Persons with Disabilities, the President's Committee on Employment of People with Disabilities and promoting special events such as the Annual National Employ the Handicapped Week and Disability Awareness Week. Promoting the establishment and improvement of rehabilitation and recreational facilities and programs; identifying barriers that hinder the mobility of the disabled; to support and promote appropriate legislation advocating issues of interest for people with disabilities; and to advise the City Council about the goals, recommendations, and activities of the committee.

Planning Commission/Board of Adjustment – The Planning Commission studies the resources, possibilities and needs of the City, prepare plans and maps for future development to improve the quality of life and propose changes to plans within the City where necessary. The Planning Commissions may also develop land use policy and make recommendations. The Board of Adjustment has the authority to hear and decide appeals concerning any order, requirement, decision or determination made by the Building Inspector. In certain cases, the Board of Adjustment may also grant permits and appropriate conditions and safeguards for Special Uses as authorized by the City Zoning Code.

It seems that it is the city's practice to seek public input in the planning and development of plans that impact the community. The City is encouraged to continue with citizen participation activities and groups

and encourage the inclusion of persons from all backgrounds including racial/ethnic, religious groups, and persons with disabilities in the planning process.

REVIEW OF THE ZONING CODE

Zoning ordinances are enforceable in courts of law by the local community and therefore warrant even closer attention to help ensure that the ordinances help the community “affirmatively further fair housing” and do not, either intentionally or unintentionally, serve as “impediments to the exercise of fair housing choice”. The Goldsboro Unified Development Code became effective in July 2007 with the purpose of promoting the health, safety, morals and general welfare of the City and to regulate and restrict the erection, construction, reconstruction, alteration, repair or use of buildings, structures or land. The Zoning Ordinance review covers key areas that have an impact on fair housing choice including zoning, building regulations, accessibility standards, and other policies and practices. The following subject areas were selected to be reviewed:

- Minimum Lot Size for Single Family Residential
- Definition of “Family”
- Special Population Housing Residences
- Multifamily Maximum Structure Height and Densities
- Other Comments

In general, zoning and land use codes can have the effect of impeding fair housing choice for several reasons. Zoning codes while intended to allow for orderly development and congruent neighborhoods, can limit the ability of housing for some persons living in those neighborhoods. For example, minimum lot sizes that require larger lots and increased setbacks can limit the development of affordable housing in some neighborhoods. Minimum lots sizes can also limit the development of group homes and other types of permanent supportive for person with disabilities and the frail elderly. Zoning codes can also be used to facilitate NIMBYism where residents of a neighborhood can protest rezoning and limit type of developments. Limitations on the definition of family such as definitions that limit the number of unrelated persons living together also restrict housing choices.

Minimum Lot Size for Single Family Residential

Chapter 5 of the Unified Development Ordinance addresses zoning in Goldsboro. There are 12 residential districts in the City seven of which are zoned for low density single family residential uses (AG; R-40; R-20A; R-20; R-16H; R-16; R-12SF) and five of which allow single family and multifamily uses (R-12; R-9SF; R-9; R-6SF and R-6). Table 48 identifies that minimum lot width, height restriction, setbacks, and other development regulations by zoning district.

Table 48. Residential Districts Dimensional Standards

District	Area*	Lot Width	Cul-de-sac**	Setbacks				Height
				Front	Rear	Side	Corner	
AG	3 acres	150	35/150	50	25	25	45	35
R-40	40,000	150	35/150	50	25	25	45	35
R-20A	20,000	120	35/120	45	25	20	45	35
R-20	20,000	120	35/120	45	25	20	40	35
R-16H	16,000	100	35/100	40	25	16	32	35
R-16	16,000	100	35/100	40	25	16	32	35
R-12SF	12,000	90	35/90	35	25	12	24	35
R-12	12,000/6,000	90	35/90	35	25	12	24	35
R-9SF	9,000	70	35/70	30	25	10	20	35
R-9	9,000/4,500	70	35/70	30	25	10	20	35
R-6SF	6,000	60	35/60	25	25	8	16	35
R-6	6,000/2,000	60	35/60	25	25	8	16	35

* The minimum land area requirements in Multi-family Districts, R-6, R-9, R-12, are expressed in what is required for the first unit, followed by the requirement for each additional unit. (Example, In the R-12 District an 18,000 square foot lot is required for two units, 12,000 first unit + 6,000 for an additional unit =18,000 square feet)

** The minimum lot width on a cul-de-sac is measured at the setback line, but a minimum frontage of thirty-five feet is required at the street right of way.

The minimum lot width in single family districts ranges from 90 feet to 150 feet and the land area ranges from 12,000 square feet to 3 acres. According to the City's Comprehensive Plan, single family residential development occurring in the last 40 years has been mainly in the 9,000-12,000 square foot lot size range which requires a minimum lot width of between 70 to 90 feet.

The Cluster Development or Residential PUD Option permits residential development on smaller lots than the standard residential development regulations. The minimum building requirements such as lot size, width, and setbacks may be reduced by up to 40% from the standard zoning districts. The purpose of the PUD is to:

- Permit creative approaches to the development of land, reflecting changes in technology or planning concepts;
- Accomplish a more desirable environment than would otherwise be possible, provide a variety of housing types, design, and arrangements;
- Provide for an efficient use of land that can result in smaller networks of streets and utilities, thereby lowering housing costs;
- Enhance the appearance of neighborhoods through preservation of natural features, the provision of underground utilities and recreational open space; and
- Provide an environment of stable character compatible with surrounding residential areas.

Definition of “Family”

The City of Goldsboro defines a family as one or more persons related by blood, marriage or adoption occupying a single dwelling unit; or a group of not more than three (3) persons, one or more of whom is not related by blood, marriage, or adoption to the others. Domestic servants employed on the premises may be housed on the premises without being counted as a separate family or families. A family may include five or fewer foster children placed in a family foster home licensed by the state.

It is important to consider how families are defined in a zoning ordinance because the Fair Housing Act requires that groups of unrelated persons be treated equally as traditional families and be held to the same regulatory requirements. The definition of family limits the number of unrelated persons in a home to a maximum of three individuals however the City allows a larger number of unrelated persons to reside in special population housing residences, therefore the cap on unrelated persons does not negatively impact persons with disabilities.

Special Population Housing Residence

The City’s Unified Development Code defines special population housing residence as a dwelling unit in which unrelated persons may reside who are battered individuals, abused children, pregnant teenagers, runaway children, temporarily or permanently disabled, mentally, emotionally, or physically, individuals recovering from drug or alcohol abuse and all other persons who possess a disability which is protected by the provisions of either the Americans with Disabilities Act of 1990, 42 U.S.C. 12101 or GS 168-20 through 168-23, as they may be amended, along with family members and support and supervisory personnel. A special population housing residence that accommodates six or less unrelated persons or more than six unrelated persons shall not be located within 1,000 feet of an existing special population housing residence. The City of Goldsboro should take care in ensuring that the spacing requirement for special population housing residences does not have the effect of restricting housing opportunities for persons with disabilities and that these facilities are integrated into communities citywide.

The FHA requires that the same standards applied to single-family residential homes should be applied to adult living facilities. In Goldsboro, special population housing with six or less unrelated persons are permitted by right in all residential districts and in the Office, Neighborhood Business (NB), Central Business District (CBD_ and Highway Business District as well. Special population housing with more than six unrelated persons are conditionally permitted in the R-12; R-9; R-6; O-R; O&I-1; and CBD, and permitted by right in the O&I-2; NB; GB; and HB districts. These are the same districts where multifamily developments of three or more units are permitted.

Multifamily Maximum Structure Height and Densities

The inclusion of multifamily and high density housing in municipal codes typically encourages the development of affordable housing. As mentioned above in Table 48, the maximum building height in all residential districts is 35 feet. Multifamily developments of 3 or more units are permitted in 10 zoning districts including three residential districts (R-12; R-9; R-6; O-R; O&I-1; CBD; O&I-2; NB; GB; and HB). Excluding multifamily housing and high-density housing from the majority of residential districts may have the effect of creating an uneven distribution of housing types throughout the City. Multifamily rental units are generally the more affordable housing option available to lower income residents. Limiting the location of high-density housing may concentrate lower income households and/or members of protected classes in certain areas. According to the City’s Comprehensive Plan, multifamily residential developments are scattered throughout Goldsboro and the ETJ. However most of these developments are

located south of the Goldsboro central business district and in the eastern areas of the Goldsboro city limits.

Other Comments

Off-Street & Handicap Parking: Section 6.1.2 of the Unified Development Code addresses off-street parking requirements when an existing structure or use is expanded, enlarged, or changed. Table 6-1 of the Code provides minimum and maximum parking space requirements in all districts. Table 49 below shows the off-street parking requirements in residential districts by use.

Table 49. Residential Off-Street Parking Requirements – Goldsboro, NC

Land Use	Minimum Parking Spaces	Maximum Parking Spaces
Accessory dwellings	1 space	n/a
Dormitories	.75 spaces per room	1.5 spaces for each room
Duplex (two attached units/lot)	2 spaces per unit	n/a
Home occupations	2 spaces per dwelling, plus 1 for visitors or 2 spaces per dwelling, plus 1 per chair for hair and nail services	n/a
Life care homes, nursing homes, assisted living, and special population housing	1 space per 4 beds, plus 1 per employee on the maximum shift	1 space per 3 beds, plus 1 per employee on the maximum shift
Manufactured home park	2 spaces per unit	n/a
Mixed use, apartments or condos above ground floor retail/office within the same building	1.5 spaces per unit, plus any additional spaces required by non-residential uses	3 spaces per unit, plus any additional spaces required by non-residential uses
Multifamily, condominiums, townhouses etc.	2 spaces per unit + .5 per bedroom over 2	3 spaces per unit + .5 per bedroom over 2
Residential care facilities - full time convalescent, attendant nursing and/or rehabilitation care	1 space per 4 beds, plus 1 per employee on the maximum shift	1 space per 3 beds, plus 1 per employee on the maximum shift
Rooming/boarder houses	1 space per bedroom	n/a
Single family attached	2 spaces per unit	3 spaces per unit
Single family detached, modular, manufactured homes	2 spaces per unit	n/a

The Building Code address parking requirements for persons with disabilities. It states that each off-street parking facility shall provide one accessible parking space for each 25 stalls. The design criteria require that accessible spaces be designed in compliance with the standards of the Americans with Disabilities Act. Section 1106 of the 2012 North Carolina Building Code states that accessible parking should be provided according to the following table. Additionally, buildings in Residential Groups R-2 and R-3 which are required to have accessible Type A or Type B dwelling or sleeping units, must provide accessible parking spaces of at least 2% of all parking spaces or a minimum of one space per Type A dwelling units, whichever is larger.

Table 50. Accessible Parking Spaces

Total Parking Spaces Provided	Required Min. Number of Accessible Spaces
1 – 25	1
26 – 50	2
51 – 75	3
76 – 100	4
101-500	5

Total Parking Spaces Provided	Required Min. Number of Accessible Spaces
151 – 200	6
201 – 300	7
301 – 400	8
401 – 500	9
501 – 1000	2% of total
1,001 or over	20, plus one for each 100 or fraction thereof, over 1,000

Building Codes and Accessibility: Local jurisdictions such as the City of Goldsboro adopt building or construction codes to regulate building safety and other standards for residential and commercial buildings. These codes are enforced through a permitting and inspection system which authorizes a specific governmental unit, typically a building department, to set fees and carry out actions.

The responsibility of ensuring that federal accessibility requirements are included in residential projects are left to the developers, designers, and operators of such buildings. State and local accessibility requirements must be enforced by the local governmental unit such as the City of Goldsboro.

The FHA and the American with Disabilities Act (ADA) has design and accessibility standards but does not have a permitting and plan review process for enforcement. However, the issuance of a certificate of completion and building permits by the City’s building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

In regards to accessibility, Section U.S.C 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multifamily housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use includes items such as wider doors and passages for wheelchairs, and adaptive design features such as accessible ingress and egress, accessible switches and outlets, reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act covers a wide range of residential housing and other units funded through federal block grant funds. Redevelopment of an existing property to add four or more units or public and common areas is considered a new building and subject to the provisions. Per U.S.C 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not subject to the provisions except for those funded with federal grants.

In addition to the FHA, the following requirements apply to accessibility of residential units:

- The Architectural Barriers Act (ABA) Standards – applies to facilities designed, built, altered, or leased with federal funds
- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds

- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.

According to the self-assessment questionnaire was completed by the Planning Department, the building codes so not include a specific reference to the accessibility requirements of the FHA. However, there is a provision for monitoring compliance which is the responsibility of the Community Affairs Department.

The City of Goldsboro's Inspections Department enforces the North Carolina State Building Codes for building, electrical, plumbing, and mechanical, fire and minimum housing. Chapter 11 of the Building Code²¹ provides regulations for the design and construction of facilities for accessibility to physically disabled persons. The Building Code addresses accessible routes, accessible entrances, parking, and dwelling units and sleeping units among other areas.

Accessory Dwelling Units: Accessory Dwelling units and accessory apartments are conditionally permitted in all single family zoned districts with the exception of the AD district. Accessory dwellings are detached from the principal structure and accessory apartments are inside the principal structure. Only one accessory dwelling or apartment is permitted per lot and may not exceed 40% of the square footage of the livable area of the principal structure or 1,000 square feet of gross floor area, whichever is less.

Reasonable Accommodations: A Reasonable Accommodation Study Group along with the North Carolina Department of Health and Human Services, North Carolina Housing Finance Agency, the School of Government at the University of North Carolina at Chapel Hill and several other organizations, contributed to the development of a guidebook titled, Fair Housing for Tenant with Disabilities: Understanding Reasonable Accommodations and Reasonable Modifications²².

Under federal and local fair housing laws, it is illegal to fail to make reasonable accommodations in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of the housing units and to fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

The guidebook outlines the fair housing laws and their applicability, explains how a tenant with a disability should make requests for reasonable accommodations and reasonable modifications to their landlord, procedures to provide or deny reasonable accommodations and modifications, and other tenancy matters.

The guidebook states that failure to comply with fair housing laws can have negative consequences for property owners and managers including: damages to a tenant such as pain and suffering; injunctive relief which could cover future business activities, civil penalties of \$10,000 for the first offense, and punitive damages. Projects that received LIHTCs could have their credits recaptured by the IRS.

The Eastern Carolina Regional Housing Authority's Admission and Continued Occupancy Policies (ACOPs) includes a commit from the housing authority to make reasonable accommodations in its

²¹ http://ecodes.biz/ecodes_support/free_resources/2012NorthCarolina/Building/PDFs/Chapter%2011%20-%20Accessibility.pdf

²² <http://www.nchfa.com/forms/Forms/ReasonableAccommodation.pdf>

procedures and practices to permit people with disabilities to take full advantage of the authority's programs and services. Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and they do not create an "undue financial and administrative burden" for ECRHA, meaning an action requiring "significant difficulty or expense."

According to the self-assessment questionnaire prepared by the City's Planning Department, the City provides reasonable accommodations for persons with disabilities who live in municipal-supplied or managed residential housing and allows these persons to make reasonable modification. A search of the City's website and a review of the municipal code, Comprehensive Plan, Consolidated Plan, Action Plan, and CAPER did not turn up any reference to the reasonable accommodation policy or procedure that is employed by the City of Goldsboro.

VISITABILITY AND UNIVERSAL DESIGN

HUD's CPD Notice 05-09: Accessibility Notice – Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and their applicability to Housing Programs funded by HOME and CDBG, recommends the use of the visitability concepts in addition to the requirements of Section 504 and the FHA. Visitability is defined by AARP in the Increasing Home Access: Designing for Visitability²³ brief as a house built to include a zero-step entrance, wide doorways with 32" of clear passage space, and a half bathroom on the main floor. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features.

PROPERTY TAX POLICIES

Policies regarding property tax increases and tax relief impacts housing affordability. Tax relief programs are usually targeted to persons protected under the FHA and local laws including the elderly and persons with disabilities.

The Wayne County Tax Department administers three property tax relief programs: The Disabled Veteran Property Tax Exclusion, Property Tax Relief for Elderly and Permanently Disabled Persons, and Homestead Circuit Breaker Tax Deferral Program. Each of the programs are described below.

Disabled Veteran Property Tax Exclusion

This program provides an assessment reduction of the first \$45,000 of value to permanent residence owned and occupied by an owner who is an honorably discharged disabled veteran or an unmarried surviving spouse of an honorably discharged disabled veteran.

Property Tax Relief for Elderly and Permanently Disabled Persons

Recipients must be a resident of North Carolina, must be at least 65 years of age or permanently disabled, and must have a total gross household income of not more than \$29,000. North Carolina excludes from property taxes the greater of \$25,000 or 50% of the appraised value of the permanent residence owned and occupied by a qualifying owner.

²³ http://assets.aarp.org/rgcenter/il/inb163_access.pdf

Homestead Circuit Breaker Tax Deferment Program

This program assists persons over the age of 65 or those that are totally and permanently disabled. The property must have been owned and occupied as the permanent residence for five years. The owner's income cannot exceed 150% of the income eligibility limit. If income is \$29,000 or less, taxes are limited to 4% of income. If income is greater than \$29,000 but no more than \$43,500, taxes are limited to 5% of income. Deferred taxes are a lien on the property a portion of which may become due and payable if a disqualifying event occurs. Disqualifying events which trigger payment are any one of the following: 1) Death of owner; 2) Transfer of the property 3) Owner ceases to use the property as a permanent residence. Exceptions to disqualifying events are as follows: 1) Death is not a disqualifying event if ownership passes to a co-owner or spouse; 2) transfer is not a disqualifying event if title passes to a co-owner, or to a spouse as a result of a divorce proceeding.

FAIR HOUSING ACCOMPLISHMENTS

In regards to fair housing actions taken by the City, one of the City's main goals has been to address the shortage of affordable housing for low- and moderate-income persons by supporting the CHDO and homeowner assistance activities. According to the City's FY 13-14 CAPER, the City has a Comprehensive Fair Housing Strategy with the goal of eliminating discrimination and unfair treatment in the sale and rental of housing in Goldsboro. The City also maintains printed material, including state and federal contact information, in English and Spanish, for persons needing assistance with private fair housing grievances. The City's Community Affairs Department is responsible for receiving and investigating complaints or charges of discrimination in housing and employment. During FY 13-14, the Community Affairs Department reported that there were 43 housing complaints received however there were no fair housing discrimination complaints.

The City hosts a Fair Housing Conference during Fair Housing Month in April of each year. The City also displays the fair housing logo and slogan at various businesses, real estate offices, and buildings scheduled for rehabilitation and construction. The City coordinates with the Goldsboro Housing Authority and the Eastern Carolina Regional Housing Authority to inform low-and moderate-income families of housing opportunities provided by the City.

The City's previous AI identified five impediments. Table 51 identifies the impediments and summarizes the actions the City has taken to eliminate the identified impediment.

Table 51. Fair Housing Actions to Address Impediments to Fair Housing Choice – Goldsboro, NC

Impediment	Actions Taken
Lack of Fair Housing Awareness and Education	<ul style="list-style-type: none"> The Community Affairs and Community Development Department provided educational forums to highlight the importance of fair housing in collaboration with community groups, realtors, landlords, potential homebuyers, lenders, and tenants.
Low Inventory of Housing for the Disabled and Other Special Populations	<ul style="list-style-type: none"> The City collaborated with Eastpointe, LME and other service providers to connect persons with specific disabilities and/or homelessness to acquire housing. The City developed Highlands of Goldsboro, a 60-unit affordable housing development for seniors.

Impediment	Actions Taken
Affordability	<ul style="list-style-type: none"> The City increase the availability of affordable housing by funding the homebuyer assistance programs and providing HOME CHDO funds to Habitat for Humanity for the construction of one new affordable housing unit.
Mortgage Financing and Disproportionate Number of Subprime Loans or Minority and Women	<ul style="list-style-type: none"> The City provided funding to Consumer Credit Counseling Service (CCCS) to provide financial and credit counseling to low-and moderate-income persons and women to improve their credit and ability to obtain conventional financing. The City worked with the banking industry to encourage compliance with CRA regulations.
Accessibility	<ul style="list-style-type: none"> The City assisted persons with disabilities through the single family rehabilitation program. The City has a referral system in place for disabled residents to receive assistance through two organizations to construct handicap ramps and/or accessible devices. The City utilized funding from NCFHA for the Urgent Repair program.

V. PUBLIC OUTREACH

This section summarizes the results of the public and professional fair housing surveys, focus groups, public meetings, and agency consultations through key person interviews, document review, and websites conducted as part of the public outreach process for the Goldsboro AI. As part of the Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i) and in accordance with Citizen Participation Plan requirements, City staff conducted a very inclusive community participation process that incorporated input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing. Additional information was gathered via teleconferences and email correspondence with nonprofit and advocacy groups. City staff from various departments provided relevant information for development of the AI.

Input was received from the public and stakeholders during the preparation of the AI. Upon completion of the draft AI, the document was available for public comment from October 15 through October 30, 2015. Copies of the draft AI were available for review at City Hall, the library, and posted on the City's website. No public comments were received during the comment period. Information on the AI was provided through newspaper ads in a publication of general circulation and through broadcast media. Public notices included provisions for reasonable accommodation and alternative formats for information for persons with Limited English Proficiency and persons with disabilities, including the hearing-impaired.

FOCUS GROUPS, PRESENTATIONS AND PUBLIC MEETINGS

In order to elicit input on public perceptions of the impediments to fair housing choice and housing discrimination in Saginaw, focus group meetings were held on, May 19 -21, 2014 with the following groups:

- Realtors, lenders, property managers
- Housing providers and advocates, as well as community housing development organizations meeting the needs of low income families, persons with HIV/AIDS, homeless, and persons with disabilities.
- City Officials and staff

Meetings were held at the Goldsboro City offices. At each session, attendees were educated on the purpose of the AI and the process to be used. Participants were asked to identify fair housing choice issues that were of particular concern to them and their comments were recorded.

In addition, members of the general public, as well as representatives of various community groups were invited to a public meeting held on Wednesday, May 20, 2014. Notification of the meeting was published in the Goldsboro News Argus on May 2, 2014.

Presentations were also made at various events including:

- | | |
|--|---------------|
| • Fair Housing Workshop at the City's Annual Housing seminar | June 14, 2014 |
| • Arts Council of Wayne County event | Oct. 3, 2014 |
| • Fairview Homes Public Housing Resident Council meeting | June 3, 2015 |

Surveys and flyers regarding the AI were distributed at the following locations:

- Wayne County Chamber of Commerce
- Partnership for Children (Smart Start)
- The Arts Council of Wayne County
- Dept. of Social Services
- Goldsboro Housing Authority (Main Office)
- Wayne County Health Dept.
- Eastern Regional Housing Authority
- Habitat For Humanity Of Goldsboro
- Herman Park Center

Cumulatively, over 200 City of Goldsboro residents either participated in or were targeted in the various meetings, focus groups and other fair housing events referenced in this report. In addition, the survey links were sent in an email blast to over 85 agency representatives on June 12, 2014.

KEY PERSON INTERVIEWS

Key Person interviews were conducted person-to-person, by teleconference, and via email correspondence with members of the City of Goldsboro staff as well as nonprofit and advocacy groups.

Organization	Title
City of Goldsboro	Community Development Administrator
City of Goldsboro	Director of Community Affairs
Wayne County Chamber of Commerce	
Legal Aid of North Carolina	
Rebuilding Broken Places CDC	
Habitat For Humanity of Goldsboro	

PRINT AND BROADCAST MEDIA

Information regarding the AI was placed in a public notice in the Goldsboro News Argus. See APPENDIX II: Public Notices for copies of newspaper ads and notices. The meetings were advertised on the City's website, via email, and publicized on the City's TV channel, as well as the City's Facebook page.

GENERAL ISSUES DISCUSSIONS FROM MEETINGS, KEY PERSONS, AND FOCUS GROUPS

Discussions regarding fair housing choice in focus groups, key person interviews, public meetings, and with City staff yielded a variety of perspective about fair housing in the City. Participants and interviewees raised some issues that limit housing choice but did not fall under the protection of the FHA. A summary of responses and is provided below.

- People with greater financial resources are moving out of the City into the County.
- Lower skilled labor - intensive jobs are on the outskirts of town, while workers live in the City.
- Transportation is a potential barrier. Public transportation does not run late enough to accommodate persons who live within the City but work on the outskirts. Those who do have their own vehicles spend a lot on fuel.
- There is plentiful supply of non-affordable housing
- There is insufficient affordable housing and there is not enough public housing available
- The renovation of on-base housing has led to more people moving back to the military base. This has caused an increase in availability of more market rate development housing in the City.
- A combination of businesses closed and houses being demolished in some areas have led to some areas not being desirable residential communities.
- Transient demographic of military personnel. People do not stay for extended periods

- There is a GIS system in place for initial filing of fair housing complaints. Cases are then investigated and referred as needed.
- There is also a TDD line available for the hearing-impaired.
- Although contact information regarding where to address fair housing concerns is available, some individuals with low education or who lack English proficiency level are reluctant to request assistance.
- Fair housing material is available in a variety of languages (provided by HUD)
- The City could consider areas such as George Street for housing development projects
- There was mixed response regarding whether the City could be considered to be a diverse community. Some individuals stated that affordable housing is dispersed throughout the City while others indicated that it was concentrated in specific areas.
- There is a digital divide. Significant portion of the low-income population do not have computers at home and technology skills are lacking.

FAIR HOUSING SURVEY RESULTS

Four (4) fair housing surveys were created and issued online through Survey Monkey, an Internet survey service for Goldsboro residents, housing providers/advocacy agencies, area Realtors, and lending institutions. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, and experience with City housing assistance and social service programs and were anonymous. Paper copies of the resident survey were administered at events and through agencies. A resident Spanish language version was available but no responses were received. Fair housing survey links were posted on the City's website. The survey findings are discussed below:

Resident Surveys

Fifty-three (53) persons who resided, worked or owned businesses in the City completed the survey from November 12, 2014 to April 27, 2015. Question tallies were not equal as some persons may have chosen to skip a question. For some questions, respondents could select multiple answers and/or provide explanation by written comments. It should be noted that the opinions of the respondents do not reflect the views, statements, or stated opinions of the report preparer or the City. Please refer to Appendix III of the AI to view the resident survey questions.

Of the 53 respondents, the majority, 35 persons (66.0%), noted that they lived within the City limits of Goldsboro. The remaining 34.0% (18) of the sample said they lived outside of the city limits.

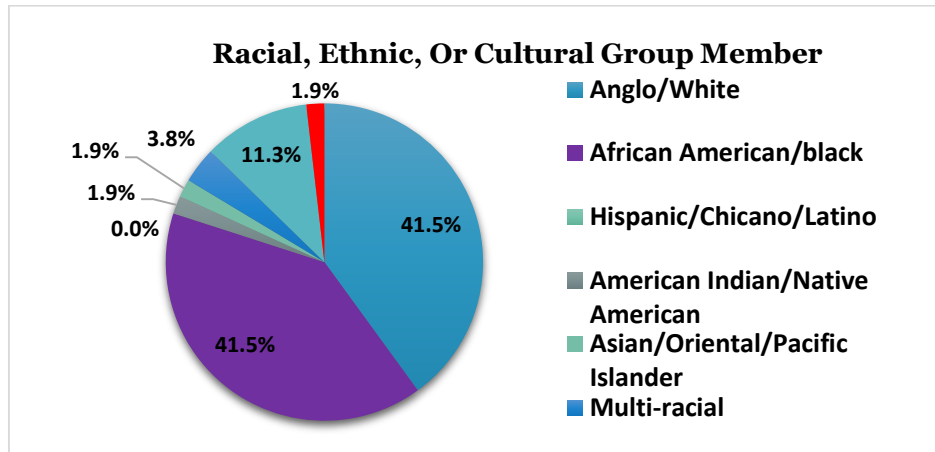
Demographics

Of the respondents, those who identified as Anglo/White and African Americans made up the largest portion of the sample with 41.5% (22) respectively. The second largest group were those who preferred not to self-identify, making up 11.3% (6). The remaining 5 people noted they were Native American, Asian, or Multiracial. There were no respondents who self-identified as Hispanic.

According to the 2010 Census, the largest racial groups in Goldsboro were Black/African American (54.3%) and Anglo/White (39.2%). Only 4.0% of the population identified as Hispanic/Latino.

Compared to the Census, the resident responses showed a similar breakdown with blacks being one of the largest racial groups but whites showing a higher representation. See figure below.

Figure 17. Racial Ethnic or Cultural Group – Public Survey, Goldsboro, NC

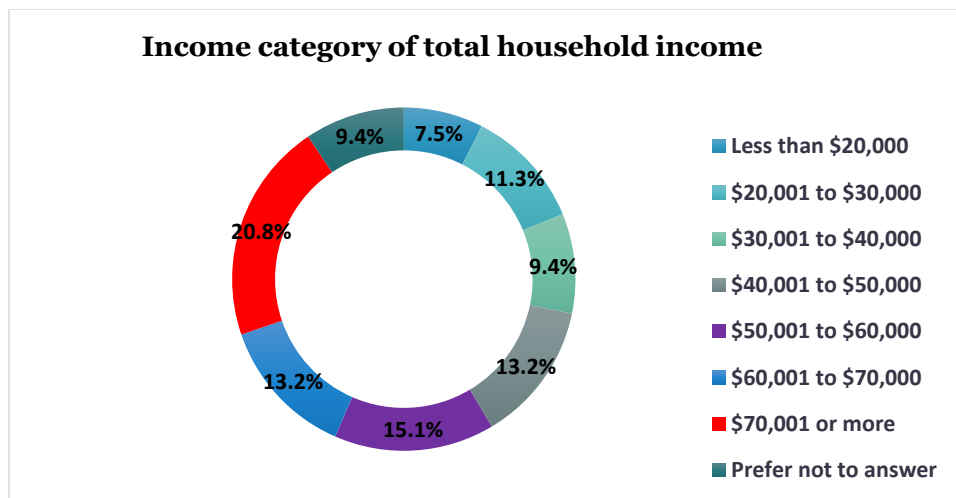


Other Characteristics

Other characteristics of the survey sample included:

- 49.1% (26 persons) of the respondents indicated they are married followed by the 24.5% (13) who indicated they are single head of household;
- 19.2% (10 persons) stated that they or someone in their household had a disability or handicap;
- 39.6% (21 persons) had children under 18 years of age;
- 20.8% (11 persons), reported the highest household income reporting income of more than \$70,000. Conversely 7.5% (7.5) reported they had the lowest income, a household income of less than \$20,000. See figure below for more details.

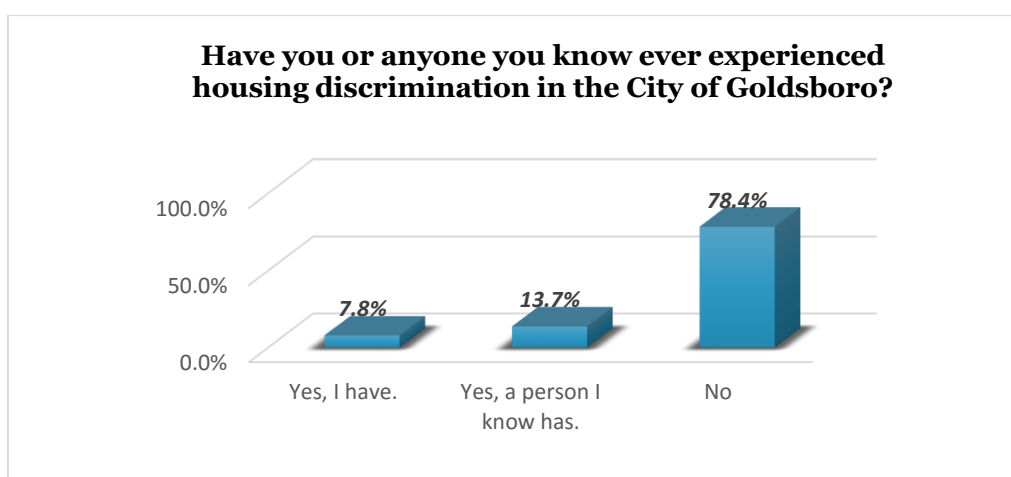
Figure 18. Income Category – Public Survey, Goldsboro, NC



Housing Discrimination

Survey respondents were also asked to identify ways in which housing discrimination can occur, based on a list of the federal, state, and local protected classes and other bases that have an impact on fair housing choice. As indicated in Figure# below, when asked if they or anyone they knew had experienced housing discrimination in the City 21.6% (11) of respondents responded yes. Of that number, 7.8% (4 persons) had first-hand experience while the other 13.7% (7 person) knew of someone who had. Race was cited as the most common basis on which housing discrimination can occur, followed by Color, Disability/Handicap, Religion, and Sex. It is also important to note that a significant portion, 44.0%, also cited poor language skills. This coupled with over 39.1% citing that there was inadequate fair housing information available in other language translations indicates an impediment to be addressed. See Appendix IV for detailed responses.

Figure 19. Housing Discrimination Experienced – Public Survey, Goldsboro, NC



Respondents who had experienced or had knowledge of discrimination were then probed further about their experience. Their results are detailed in Appendix IV. Of the 56 respondents who felt they were discriminated against, 80.0% reported it was by a rental property manager/multi-unit housing followed by 20.0% saying it was the seller of a housing unit. “Other” responses included the City of Goldsboro. Regarding the location where the discrimination occurred, 41.7% indicated at a rental apartment complex and a public housing authority respectively, followed by 25.0% at a single family housing unit for sale.

Familiarity and Knowledge of Housing Programs and Fair Housing Laws

A significant number of Goldsboro residents 59.6% (31 persons) appear to be unaware of fair housing laws, services, and responsibilities. Almost 50% (24 persons) indicated that they had not seen any information while 36.0% (18) indicated they had seen fair housing flyers and pamphlets.

Regarding knowledge of Fair Housing laws, only 5.8% (3) considered themselves to be Very Knowledgeable while 51.92% (27) noted they were Somewhat Knowledgeable, and 42.3% (22) said they were Not Knowledgeable.

See figure 20 below for respondents’ suggested methods of disseminating fair housing information.

Figure 20. Suggested Methods of Dissemination – Public Survey, Goldsboro, NC



Effectiveness of Current Laws

When asked if current fair housing laws and enforcement mechanisms are effective, 61.4% of respondents feel they are Somewhat Effective, 9.1% Very Effective, and 29.5% Not Effective. Respondents were asked to list the reason for their responses and their reasons included:

- *More attention needs to be paid towards educating the offenders.*
- *Unsure of what housing laws are*
- *I ran into a person*
- *Money is wasted on items that don't need to be replaced, but the government is mandating the upgrades, so the replacement is being done. In example, changing out of good working gas packs and installing electric heat pumps*
- *I don't have any information other than this survey*
- *The entire program is acceptable; however, the choice of employees are unacceptable.*
- *It's always more rules but no fixes to past and present issues.*
- *Lack of information*
- *As absence of public knowledge*
- *Limited locations that do not allow for safe environments*

While, the majority of respondents, 70.5% feel the current laws are effective to some degree, due to a significant enough portion of responses indicating they are not effective, it is still important that the City continues its efforts to educate and address impediments to fair housing choice.

Current Impediments

When asked about the current impediments to fair housing choice in Goldsboro, answers included Federal, State, and Local Protected Classes and other responses as follows:

- *High prices for safe clean housing*
- *Crime. Too much "affordable" housing leads to additional crime. Stop building projects if you want to city to thrive*
- *Shumlords know they can get away with it*
- *Lack of luxury rental properties*

Geographic Limitations of Housing Choice

The majority of respondents (60.8%) perceived that affordable housing choices concentrated in certain projects/areas/neighborhoods and were not spread throughout the City of Goldsboro. The main reasons provided for geographical limitations were:

- *Lower income*
- *Most of the affordable housing options are located in concentrated areas close to housing projects or are at least within a 1 mile radius in this city.*
- *Housing developments*
- *With a limited income, you may have to live in an area that may not be safe, due to crime.*
- *Crime*

The following areas were perceived as having concentrated affordable housing:

- *Slocum Street area*
- *East Wayne*
- *Near Arabic owned stores to destroy African Americans population.*
- *The hood or ghetto which ever you prefer*
- *Low income/public housing regions*
- *un-kept housing near public housing regions, rental houses close to downtown*

Certain geographic areas or neighborhoods were perceived to be undesirable by a majority (76.0%) of respondents. Undesirable areas were identified by those surveyed to include:

- *Too many to list. All of the projects, anything south of Ash Street, George Street, A Street, Downtown Area, etc....*
- *Yes, Slocum Street, areas off Grantham Street and over near Union Station: Virginia Street and North Carolina Street for instance.*
- *Slocumb, Day, Circle, West Haven*
- *Area of Elm Street*
- *Basically everywhere. I wouldn't dare live south of Ash Street*
- *The areas that are within a close proximity to government housing.*
- *housing complexes and developments, areas that have higher crime rates*
- *"Anything south of Walnut St*
- *Near the train station (Virginia Ave, Carolina Ave)*
- *Around the Franklin Bakery Area*
- *Around the soup kitchen area on James St*
- *North of Royall Ave (behind Borden)*
- *Near the City of Goldsboro maintenance complex"*
- *High crime areas*
- *Do not wish to live near any housing authority properties, or Arabic owned stores.*
- *Areas with run down public housing. These are often high crime rate areas and I would not live there*
- *Goldsboro Public Housing*
- *Goldsboro Housing Authority (all)*
- *Slocumb, Elm, W. Ash, Carolina, Virginia streets just to name a few*
- *Green acres is the name I hear it to be but The "Jungle" is what they call it.*
- *Housing Authority Apartment areas - outward appearance of apartments are dated and not appealing; it (wrongly) gives the representation of crime infested, low-income area*
- *Un-kept housing near public housing regions, rental houses close to downtown*
- *South Of Elm, Areas Around Downtown*
- *Areas Around Downtown Area, Housing Authority Neighborhoods*
- *Many undesirable within downtown/historic district.*

Housing for Special Needs

Less than 40% of respondents perceived that there was an inadequate supply of affordable housing available to residents with disabilities, senior citizen residents, and residents with children. When asked to expand on their choices, answers included lack of availability for such housing in desirable

neighborhoods, shortage of shelters for the homeless and veterans, more houses for families with children, and high rent costs.

Fair Housing Education and Enforcement

When asked how they would respond to housing discrimination, the largest number of respondents (23 persons, or 46.9% of all responses) answered that they would contact City offices. A similar percentage (42.9%) said that they would contact a local fair housing organization. Of those who selected “Other,” responses included that they were afraid to complain for fear of retribution, or they would also contact the NAACP.

When asked to indicate the most effective ways to inform residents about fair housing rights and/or responsibilities, the use of public meetings, television ads and the City’s website were selected. The next most effective means selected were public meetings, fair housing literature, and information on the City’s Website.

Suggestions for additional actions or changes to fair housing laws and practices that could be taken by the City to address impediments and improve fair housing choice for all residents included:

- *Actually follow-up and handle some of these rouge landlords.*
- *Have more camper lots available*
- *Come to churches*
- *Realtors*
- *Rent to own Section 8*
- *Have a town meeting for all residents on their responsibilities and rights as a tenant.*
- *Reduce the amount of housing developments and limit the occupants allowed residency time.*
- *Tear down all the dilapidated houses that the criminals are hanging out in*
- *Make the police more visible in the low income areas of the city*
- *Make Fair Housing Day fun like the event that is held by the Police Department each year at Herman Park to fight crime.*
- *Be nice to people. Common sense.*
- *Advertise more*
- *People need to be informed.*
- *Focus on limiting the time available to the residents for housing, improve and enforce the education factors to help move people from housing complexes to private homes.*
- *Clean up the neighborhoods and crack down on the drug dealers and crime*
- *Encourage all housing authority employees to respect residents' privacy. Entering homes without consent is an invasion to privacy. Residents' are not living rent free, so this slavery mentality must go, or lawsuit will occur. Most importantly, hire individuals who understand the importance of good work ethics, sleeping with residents or coworkers should be prohibited, and also embezzling money well.*
- *Engender a spirit of sisterhood and brotherhood within the residents*

Realtor Surveys

Goldsboro real estate professionals were invited to attend an informational AI meeting/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for realtors. The survey was available from November 12, 2014 to April 27, 2015 and completed by three (3) Realtors.

The realtors indicated they were all Very Knowledgeable of fair housing laws, including State of North Carolina fair housing laws. They noted that they all had received training on fair housing through continuing education and certification training.

When asked about fair housing choice, Insufficient Income, Lack of sufficient quality affordable housing, and the Inability to secure Loans were cited as impediments. In addition, regarding current fair laws and enforcement mechanisms 2 of the 3 thought them to be Highly Effective, while the remaining realtor felt they were Somewhat Effective. Finally, they felt that existing fair housing laws were enforced in a fair and impartial manner.

When asked about their listings all 3 realtors were unanimous in noting that they:

- accepted listings or show homes outside of your specialty/niche market;
- accepted listings regardless of home value; and
- accepted listings in low-income or minority neighborhoods of the City of Goldsboro

The realtors also noted whether or not the following fair housing marketing practices and procedures were used in their business:

Table 21. Fair Housing Marketing Efforts – Public Survey, Goldsboro, NC

Promotional Efforts Questions	Yes # and %	No # and %
Do you have any materials displayed to promote fair housing?	2 66.7%	1 33.3%
Does your company's advertising on website, posters, etc. contain diverse human models?	2 66.7%	1 33.3%
Do your marketing materials and/or display advertisements include images of people of diverse racial/ethnic backgrounds?	2 66.7%	1 33.3%
Do you publish in local minority and multi-lingual publications?	2 66.7%	1 33.3%
Does your company undertake any special/affirmative marketing efforts to target minorities or low-income clients?	1 33.3%	2 66.7%

Realtors were then asked about their policies and business practices. Their answers are noted below:

Table 22. Fair Housing Policies and Practices – Public Survey, Goldsboro, NC

Fair Housing Policies and Practices Questions	Yes	No
	# and %	# and %
Does your company have written policies addressing Fair Housing Laws?	3 100.0%	0 0.0%
Do you publish in local minority and multi-lingual publications?	2 66.7%	1 33.3%
Do you serve clients participating in public homebuyer subsidy programs?	3 100.0%	0 0.0%
Do you intentionally employ bilingual individuals on your management and sales staff in order to serve clients with poor English language skills?	1 33.3%	2 66.7%

In addition, the realtors noted they did not have any groups or individuals who had filed complaints against their real estate company, or initiated legal action on the basis of fair housing discrimination, with any Federal, State, or local regulators.

Housing Provider Surveys

Goldsboro housing providers were invited to attend an informational AI focus group/feedback session for realtors, lenders and housing providers, as well as complete the fair housing survey for housing providers. A total of 3 housing providers completed the survey. None of the providers provided assistance with fair housing complaints and only one provider had received fair housing training.

In regards to their advertising one provider noted their company had materials displayed to promote fair housing as well as using diverse human models on their company's website, posters, and other promotional materials. The remaining two providers noted they did not employ these advertising strategies.

Housing providers also identified appropriate actions for clients who have experienced housing discrimination including filing complaints, contacting the City, State or HUD, seeking legal help, and registering complaints with the Tenant Advisory Committee which hear discrimination cases

Housing providers were also asked about fair housing laws and their effectiveness. Two out of the three providers felt that they were Somewhat Knowledgeable of fair housing laws, including North Carolina fair housing law. The remaining provider felt they were Very Knowledgeable. Regarding effectiveness of these, only one provider felt the laws were somewhat effective. The following were expanded comments:

- *Most people experiencing discrimination are not vocal about their experiences for fear of retribution.*
- *Recourse is available, but may not be easy or understandable for those who need it. There is a lack of skill/education/experience for many of the individuals who are at risk of being discriminated against.*

When asked about fair housing choice Housing providers unanimously agree that it was geographically limited to certain areas or neighborhoods in the City of Goldsboro. The areas noted included the southern parts of Goldsboro and higher crime areas. They also agreed that certain areas were perceived by residents as undesirable and noted downtown, poorer school districts and the Olivia Lane/Slocumb Street, Day Circle areas as the areas residents found most undesirable. In regards to housing choice impediments Race/Color/Ethnicity/National Origin, Sexual Orientation, Insufficient Income, and Lack of sufficient quality affordable housing were listed as impediments.

Finally, in order to reduce these impediments and improve the current climate housing providers suggest the City of Goldsboro do the following:

- *Decrease bureaucracy time frames and allow for removal of individuals who are not complying with HUD regulations so that those who will comply will have more options. Require accountability from residents.*
- *Acquire land for affordable housing throughout the city so that providers may develop units for the city.*
- *Streamline public housing offerings. Current programs are provided by multiple agencies and are not within the purview of the city itself.*

Lender Surveys

Goldsboro lenders were invited to attend an informational AI focus group/feedback session for realtors, lenders and housing providers. In addition lenders were invited to complete a lender fair housing survey. However no lending institutions opted to complete it.

VI. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

CURRENT 2015 IMPEDIMENTS AND RECOMMENDATIONS

INTRODUCTION

Based on research of available demographic and housing data and feedback from residents and entities involved in affordable and fair housing issues, the City of Goldsboro has identified the following impediments to fair housing choice in 2015. This section will review the impediments, briefly discuss related issues and their impact on members of the FHA protected classes. The impediments are broken down in categories used in the Fair Housing Planning Guide: Public Sector, Private Sector, and Public/Private Sector. Recommendations for specific actions, both curative and preventative, that the City could take to reduce or remove those impediments are also included in this section. Several recommendations include best practices used nationally.

The new Fair Housing Final Rule, issued at the time of this publication, focuses more on “affirmatively furthering fair housing” activities in the Consolidated Plan process. Fair housing planning will become one of the factors in setting Consolidated Plan priorities and how resources are to be committed including fair housing activities. Many of the recommendations contained in this report are based on a proactive or “affirmative” approach that reflects the goals and objectives of the Fair Housing Final Rule. The AI will be ultimately replaced by the new “Assessment of Fair Housing (AFH)” under the Fair Housing Final Rule. The earliest AFH will be due nine months before a Consolidated Plan that is due after January 2017 or

later depending on the level of CDBG funding received in FY 2015. Since the City's just completed a five-year Consolidated Plan, its AFH will not be due until the next Consolidated Plan due in 2020. The subject AI will serve as the basis for the City's affirmatively furthering fair housing activities until the AFH is due and a guide to facilitate fair housing action planning as outlined in Section VII of this report.

IMPEDIMENTS AND RECOMMENDATIONS – PUBLIC SECTOR

A. Zoning and Site Selection

1. **Impediment: The City has zoning codes, land use controls, and administrative practices that may impede fair housing choice and fail to affirmatively further fair housing.**
2. **Impediment: Requirements for commercial/business districts do not encourage residential uses and limit affordable housing close to public transportation.**
3. **Impediment: Inadequate consideration of demographic data and housing needs of FHA protected classes such as persons with disabilities in the City's planning processes and documents such as the Comprehensive Plan.**
4. **Impediment: Public notification and community approval of affordable housing development for projects that are approved by right may initiate and support NIMBY and other opposition which limit fair housing choice.**

Response: The City will review current laws and regulations to determine their impact on the FHA “protected classes” and their fair housing choices and make changes, as appropriate, to comply with the FHA using the following actions:

Recommendation #A-1: Review zoning and other land use controls and certify that these local controls do not constitute barriers to fair housing. City staff will list zoning and land use controls that impact fair housing and assign the appropriate departments, boards and commissions to assess those impacts and submit revisions for consideration.

Recommendation #A-2: Conduct an analysis of zoning and land use controls and building codes related to residential care facilities and group homes and make recommendations to address any barriers to fair housing choice.

Recommendation #A-3: The City will include more specific demographic information on FHA protected classes in comprehensive plans and other neighborhood planning documents and expand on the impact of their needs on the distribution of community resources.

Recommendation #A-4: Revise zoning codes to expand mixed-income and affordable residential uses in non-residential districts.

Recommendation #A-5: Broaden the range of explicitly permitted residential uses, especially those that expand housing choice such as single room occupancy, supportive housing, and others.

Status: Planning, land use and zoning laws affects housing choice in a variety of ways including lengthy approval times, resultant added costs, and limit FHA protected classes to high poverty and low

opportunity areas. The City has current zoning and land use regulations that encourage housing choice but these can be expanded and strengthened.

B. Neighborhood Revitalization and Improvements and Racial Concentration

1. **Impediment: Historic and consistent pattern of concentration of racial/ethnic and low income populations in the City.**
2. **Impediment: Significant vacant and dilapidated structures in some neighborhoods affect housing affordability with a disparate impact on members of the protected classes.**
3. **Impediment: Concentration of Housing Choice Vouchers in high poverty low-opportunity areas and refusal to accept vouchers in better areas can restrict the fair housing choice for members of the protected classes.**

Response: The City will develop strategies to address patterns of concentration and increase affordable housing investments in low poverty and high opportunity areas to achieve some balance using the following actions:

Recommendation #B-1: Include concentration reduction strategies in the City's Comprehensive Plan and Housing Policy, if applicable, and encourage the development of mixed income housing projects.

Recommendation #B-2: Develop strategies to address code enforcement and demolition in certain neighborhoods including designation as slum and blight areas allowing CDBG funding to be used along with other state and local resources.

Recommendation #B-3: Work with the Goldsboro Housing Commission and the landlords association to fund and implement a voluntary program that encourage rental property owners in low poverty and high opportunity areas to participate in the Section 8 Program.

Recommendation #B-4: Work with the Goldsboro Housing Commission to provide housing mobility counseling and financial assistance for voucher families for units in low poverty, high opportunity areas.

Recommendation #B-5: Encourage and work with the Goldsboro Housing Authority for the PHA to conduct periodic analysis of vouchers distribution by family type and race/ethnicity to identify any pattern of segregation and take actions to promote greater choices.

Status: Due to patterns of affordable housing concentration, the City will ensure that subsidized housing is sited in areas with higher level of community assets. Providing more affordable housing does not further fair housing if that housing is still concentrated in high poverty and low opportunity areas. The City can also facilitate balance by addressing infrastructure, facilities, public services, and education; environmental and undesirable land use hazards; transportation to employment centers; and economic and job opportunities in those areas.

Some landlords are refusing to accept tenants with housing choice vouchers. A national study using HUD customer satisfaction data was conducted.²⁴ Although the City of Goldsboro was not included in the sample, the data analysis demonstrates the following which may apply to the City: Minority families with

²⁴U.S. Department of HUD, Racial and Ethnic Disparities in Rents of Constant Quality Units in the Housing Choice Voucher Program: Evidence from HUD's Customer Satisfaction survey, March 2011

vouchers pay more than white families with vouchers for the same type of housing and seem to pay a premium for selecting a low poverty area more than a white family would pay. Best practices suggest that a well-informed family with a voucher is at an advantage over someone who is not. The PHA has existing policies to assist Section 8 voucher holders to locate housing units outside of minority areas and to market the Section 8 Program to property owners outside minority concentrated areas.

C. Fair Housing Complaint System

1. Impediment: The City has an inadequate fair housing complaint and referral process which may hinder fair housing enforcement.

Response: The City will review its current system for identifying and processing fair housing complaints and make changes, as needed, using the following actions:

Recommendation #C-1: Strengthen the fair housing complaint referral system and monitor the disposition of fair housing cases and use this data for fair housing planning and the City's annual report to HUD.

Recommendation #C-2: Establish a fair housing presence on the City's website through providing fair housing information including where to submit complaints or links to HUD or fair housing agencies.

Recommendation #C-3: Conduct an annual survey to determine program effectiveness.

Status: Currently fair housing received by the Community Affairs Department and are processed and addressed. Over a five year period from July 1, 2009 to May 2014, 297 housing complaints were received of which only one complaint was a fair housing complaint. The one complaint was resolved through the complainant moved out of the City by their own choice after meetings and attempts at resolution. The other complaints were five (5) regarding dilapidated and condemned properties and 291 were related to code violations. The resident surveys shows that there were more fair housing complaints which were not reported to the City.

D. Employment-Housing-Transportation Linkage

1. Impediment: Unreliable public transportation options, especially outside of the corporate limits fair housing choice with a disparate impact on FHA protected classes.

Response: The City will continue to address the linkage between employment, housing, and transportation especially for members of the FHA protected classes using the following actions:

Recommendation #D-1: Maintain or increase local contributions to the Gateway Transportation Service Plan.

Recommendation #D-2: Increase affordable housing in transit oriented housing developments and promote/support more mixed –income projects close to employment centers.

Status: Generally, public transportation is used by lower income, some minorities, the elderly and persons with disabilities who are unable to afford a car and are therefore disproportionately impacted by

insufficient public transportation in housing choice. The City's 2035 Goldsboro Urban Area Long Range Transportation Plan as well as the GATEWAY Transportation Service Plan (2010) supports Transit-Oriented Development (TOD) that includes higher density and mixed-use development around high-use bus stops and the rail station at Union Station.

IMPEDIMENTS AND RECOMMENDATIONS – PRIVATE SECTOR

E. Private Sector Lending Policies and Practices

1. **Impediment: Protected class member are disproportionally impacted by lending practices based on disparities in loan denial rates, high costs and predatory practices.**
2. **Impediment: Protected class members are disproportionately impacted by credit history and low incomes that limit their loan qualification amounts.**

Action: The City will work with lenders in Goldsboro and seek through research, dialogue, and training to develop and implement strategies to reduce the disparities experienced by the FHA protected classes using the following actions:

Recommendation #E-1: Coordinate with lenders, mortgage brokers, realtors, and their associations, and community and fair housing groups to discuss issues and solutions to lending disparities with an annual fair housing seminar/symposium and mortgage products information.

Recommendation #E-2: Establish a public financial education on predatory lending, mortgages, and loan scams and invite lenders to participate in the education process.

Recommendation #E-3: Form partnerships with community organizations, employment centers and housing counseling agencies to provide or sponsor consumer education programs on bank products and services, financial management, savings and investment and/or credit.

Recommendation #E-4: Consider an ordinance requiring all subrecipients, mortgage lenders, mortgage brokers, Realtors, and other housing professionals participating in the City's programs to have completed a training course on "affirmatively furthering fair housing."

Recommendation #E-5: Require all beneficiaries of the City's housing programs to participate in homebuyer education prior to purchasing a house including available mortgage products, home care and the perils of subprime borrowing after occupancy.

Status: It appears that based on an analysis of Home Mortgage Disclosure Act (HMDA) data and Community Reinvestment Act (CRA), the denial rate in census tracts with higher racial and ethnic minorities are higher. Survey and anecdotal information indicates that there has been an increase in loan scams targeted to ethnic and minority communities. The City is required to include provisions in its CDBG subrecipient agreements for affirmatively further fair housing and may choose to do so in agreements with other parties. While many real estate professionals are receiving fair housing training, the training to be offered by the City would have a wider scope. Only the Neighborhood Stabilization Program has a requirement for pre-purchase homebuyer counseling. Many non-profits required such education as a best practice because of their value in reducing foreclosure rates and addressing predatory lending after funding is received.

F. Private Sector Real Estate Policies and Practices

1. **Impediment: Impediment: Housing discrimination by landlords of single family dwellings and multi-family developments restrict fair housing choice among members of the FHA protected classes.**
2. **Impediment: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.**

Action: *The City will promote education on reasonable accommodation and support services for persons with mental disabilities using the following actions:*

Recommendation #F-1: Work with its partners to promote education and awareness about mental disabilities and encourage housing providers to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.

Status: Focus groups noted cases involving potential loss of housing due to mental disabilities and the need for adjustments to assist affected persons. For example, a person with a mental disability may lose housing because they have not heeded recertification notices due to illness.

Action: *The City will develop policies and approaches that will target compliance with the FHA among landlords using the following actions:*

Recommendation #F-1: Require developers of City-funded or supported projects to include a restrictive covenant and/or agreement clauses that require property managers to participate in fair housing training periodically during the compliance period of the property. At a minimum, each new property manager must show proof of fair housing training.

Recommendation #F-2: Work with the local landlords association to ensure that fair housing training is offered to landlords within the City. At least two sessions should be held annually.

Recommendation #K-3: Provide housing providers, real estate agencies, property managers, and landlords with brochures or other literature in multiple languages containing information about the fair housing laws to distribute to all prospective tenants and homebuyers.

Status: Survey results and focus group discussions identified housing discrimination among property managers and landlords as the main basis of fair housing complaints.

IMPEDIMENTS AND RECOMMENDATIONS – PUBLIC AND PRIVATE SECTOR

G. Special Needs Housing and Accessibility through Visitability

1. **Impediment: Public and Private Actions (inadequate accessible housing) and private attitudes (NIMBYism) limits housing choices for seniors and persons with disabilities.**

Action: *The City will work with the private sector to facilitate an increase in the number of accessible housing units based on need and address NIMBYism using the following actions:*

Recommendation #G-1: Prepare an inventory of the current supply of decent, safe, and affordable housing and projected growth of residents with disabilities and an aging population, assess the need for accessible units and identify resources to fill any gap.

Recommendation #G-2: Work with community boards addressing special needs housing for seniors and persons with disabilities identify priorities and address needs and educating the public on the concept of affordable housing.

Recommendation #G-3: Work with other regional governmental entities and fair housing organizations to increase education and counter misperceptions and NIMBYism through regional and national solutions and shared best practices.

Recommendation #G-4: Consider an ordinance that requires all new construction homes to meet visitability standards and that requires first floor visitability for homes constructed with HOME or other housing and community development funds, LIHTC or bond funds.

Status: It is clear from the City's Consolidated Plan that there are currently not enough resources available to meet the housing needs of persons with disabilities. In order to address this issue, housing units available to disabled persons that are both affordable and accessible are needed. The listing should also be updated on a regular basis and made available to the public.

There are negative perceptions of "affordable housing" in the community that link subsidized housing to inadequate housing, poor property management, crime, and reduction in neighborhood housing values. Such misperceptions results in resistance to affordable housing in low poverty and high opportunity neighborhoods and creates housing segregation and concentration of such housing in communities with higher minority and low income populations. NIMBYism is an issue that can be addressed through regional solutions and sharing of best practices.

The cost of retrofitting existing older houses for protected class members based on age and disabilities is challenging as many are currently cost burdened. Other jurisdictions have successfully visitability provisions for all new housing. The City should assess the level of increased costs in order to address claims that it raises the cost of housing.

H. Housing Affordability

1. **Impediment: Lack of or inadequate affordable housing for Goldsboro residents due to high costs, availability of land, and diverse sites especially in low poverty "high-opportunity" areas limits fair housing choice.**
2. **Impediment: A highly competitive real estate market and investors with cash makes it challenging to create and/or preserve affordable housing.**
3. **Impediment: The age of housing stock coupled with the existence of lead paint hazards and limited financial resources for landlords to abate lead paint limits housing choices for families with young children.**

Action: The City will work with the private sector to increase the production and preservation of affordable housing units using the following actions:

Recommendation #H-1: Increase the supply of affordable housing for renters and homeowners and further residential integration by supporting the development of “inclusive” housing projects by leveraging public with private sector funding in “high opportunity” areas.

Recommendation #H-2: Encourage non-profit developers and community housing development organizations (CHDOs) under the HOME program to use resources such as the National Community Stabilization Trust (NCST) to access foreclosed properties pre-market.

Recommendation #H-3: Facilitate relationships between non-profit developers and individual banks to have foreclosed properties transferred to developers and assist in funding rehabilitation costs with other partners.

Recommendation #H-4: Increase the provision of services including housing, credit, and foreclosure prevention counseling and financial assistance with the goal of reaching an increased number of minorities and low- and moderate income households.

Recommendation #H-5: Work with lenders and developers to preserve existing affordable rental housing especially in low poverty, high-opportunity areas to prevent them from being converted to market rate housing.

Recommendation #H-6: Offer density bonuses, fee waivers and other incentives along with inclusionary zoning for multifamily and single- family developments that propose to increase affordability and access to housing opportunities in low poverty and high-opportunity areas.

Status: An analysis of housing affordability in the City indicates that there is a shortage in the supply of affordable housing units for both owners and renters and that minorities are disproportionately impacted by housing cost burden. In addition, data shows that subsidized housing is concentrated in census tracts with high minority and poverty concentrations. The levels of concentration are not explained by the lower cost of land, economic means, and other factors and denies equal opportunity to members of the FHA protected classes. In recent years, public funding, including CDBG and HOME funds have been declining.

Non-NCST banks could partner with local non-profits to transfer foreclosed properties for affordable housing. The City’s CDBG, HOME funds or Neighborhood Stabilization Program Income as direct low interest loans, grants, or loan guarantees could be an incentive to the banks to provide funds through the CRA Act for redevelopment. Federal Home Loan Bank of Atlanta which provides funds to its members for affordable housing could also be leveraged. See link to their website: <http://corp.fhlbatl.com/services/affordable-housing-programs/>.

Some of the affordable homeownership stock in the City is being reduced by foreclosures in minority concentrated areas at higher rates and attributable to predatory lending practices or other discriminatory housing practices. Unemployment, underemployment, or creditworthiness are also factors. Many home owners in the City are cost burdened (spending more than 30% of their income on housing) and severely cost burdened (spending more than 50% of their income on housing). Homeownership maintains community stability.

Affordable housing developments such as LIHTC projects that have met their affordability requirements are eligible to be converted to market rate housing removing them from the inventory. The City will

identify funding to assist developers to purchase such properties. Developer incentives along with mandatory inclusionary zoning promote mixed income housing. Voluntary inclusionary zoning requirements have traditionally been undersubscribed.

I. Economic Factors

1. **Impediment: Lack of financial resources for both individuals and housing providers limit fair housing choices. Non-compliance with Section 3 of the Housing and Urban Development Act of 1968 prevents members of protected classes from gaining economic opportunities necessary to allow them to exercise fair housing choice.**

Action: *The City will improve and expand Section 3 economic opportunities for eligible persons and businesses using the following actions:*

Recommendation #I-1: Provide independent training to city staff and local sub recipients and consultants on best practices for implementing Section 3.

Recommendation #I-2: Consider adopting an ordinance to require all city contracting to operate under the Section 3 program.

Status: As part of its Annual Action Plan, the City plans to recruit low income citizens for work opportunities. While affordable housing is a necessary strategy in improving the life of residents, it has to be coupled with an income strategy as many owners and renters in the City are cost burdened and are severely cost burdened.

J. Informational Programs, Education, Outreach, and Advocacy

1. **Impediment: Inadequate fair housing education and awareness to all members of the community resulting in misconceptions, violations of fair housing laws and failure to report such violations.**
2. **Impediment: Lack of knowledge results in underutilization of available complaint systems and resources, meaning possible fair housing violations go unaddressed and without sanction for those who discriminate.**
3. **Impediment: Language barriers especially among immigrant populations limits access to all available housing and awareness of fair housing rights.**
4. **Impediment: Lack of fair housing training for City staff, officials and zoning and planning boards limits their awareness of the effect of actions, decisions, or omissions on fair housing choice.**

Action: *The City will continue and expand fair housing education and outreach especially for underrepresented populations and City officials using the following actions:*

Recommendation #J-1: Will expand its fair housing education and outreach efforts to underrepresented groups to help continue to keep the public informed of their rights.

Recommendation #J-2: Use the City's cable television channel(s) and social media to disseminate fair housing information and events including the use of public service announcements and fair housing videos from HUD's YouTube channel.

Recommendation #J-3: Develop a fair housing web page with a link from the City’s main web page, which will be used to educate residents on fair housing, how to spot acts of discrimination, and how to file complaints with a link to fair housing agencies and to HUD.

Recommendation #J-4: Require that City elected officials, city managers and assistant city managers and relevant city department heads and assistant city department heads participate in an affirmatively furthering fair housing workshop session conducted by an independent fair housing training professional including the implications of the new Fair Housing Final Rule.

Status: The City’s demographics show an increase in minority groups some of which don’t use the City’s community development services. It was also noted that housing discrimination issues for some groups differ such as the condition of housing and steering for immigrants with refugee status. LEP and multiple languages are also factors. Resident input suggested other means to disseminate on fair housing information. Many residents were not familiar with the City’s housing or social services. The City’s website does not include fair housing information.

VII. FAIR HOUSING PLANNING

INTRODUCTION

In “the Future of Fair Housing,” a 2008 report of the National Commission on Fair Housing and Equal Opportunity, the authors state that “...despite the strong statutory underpinning for the affirmatively furthering obligation, the testimony unanimously reported that the process was not functioning as intended. HUD has not been successful in bringing the affirmatively furthering obligation to life.”²⁵ Such statements and studies that demonstrate that segregation of housing by race and ethnicity and housing discrimination still occurs at levels that surprise us raises the question of what is the disconnect between desire and execution.

The Goldsboro 2015 AI has identified barriers that impede the desire and vision of a City where all residents are guaranteed the “right to choose where to live without facing discrimination or legally imposed obstacles” as envisioned by Congress when the Fair Housing Act of 1968 was passed. As a result of data gathered from research, meetings with residents and stakeholders, document reviews, and surveys, and to address impediments, recommendations were made which included education and awareness, legislative review, development of a housing policy, forming local and regional partnerships, investment and leveraging of resources, and using accessibility and Universal Design concepts.

While the City must continue to work to achieve fair housing choice for its residents, it should be recognized that the City may not have the resources to reduce or remove these impediments without local and regional partnerships. Perhaps, the challenge in moving from desire and execution is the planning that takes place out of a study such as the AI.

²⁵ National Fair Housing Organization website, The Future of Fair Housing Report, page 9
http://www.nationalfairhousing.org/Portals/33/reports/Future_of_Fair_Housing.PDF accessed April 21, 2015

FAIR HOUSING ACTION PLANNING FRAMEWORK

In response to the impediments identified and recommendations to address them contained in this report, the City of Goldsboro is required to develop a Fair Housing Action Plan (FHAP) in accordance with Chapter 2 of the HUD Fair Housing Planning Guide: Volume 1. In light of constrained federal, state, and local budgets, Goldsboro, like many other jurisdictions, may not have all of the resources that will be needed to carry out the recommendations contained in this report. The recommendations are intended to serve as a basis for fair housing planning by the City. Priorities will have to be determined, goals established, and human and financial resources as well as partnerships identified to ensure that the City addresses fair housing choice issues raised in the study.

The FHAP will indicate the specific actions to be undertaken to address each impediment based on the resources available to the City and established priorities. A timeframe for implementation of the actions will also be prepared as determined by the City consisting of one, three, and five-year increments as well as activities that will be carried out on an ongoing basis over the five years covered by the City's Consolidated Plan. There are some resources, partnerships, and systems that are currently in place and can be deployed in the short term while other issues may have to be addressed over a longer time period. The FHAP will be developed with input from City Council, City Departments that participated in the AI process, the City's Manager's office, housing providers, realtors, lenders, non-profits, fair housing advocates, and the general public.

The following steps are proposed for the fair housing planning process:

1. Establish an AI Implementation Coordinator

Upon completion of the AI, the City's Community Development Department will be responsible for and held accountable for the implementation and ongoing compliance with the AI. The Department will be responsible for coordinating the fair housing planning, implementation, and monitoring functions. That unit of the City will be act as liaison between the City and external agencies and other City departments.

2. Communicate AI Results

The City should communicate the results of the AI to the public and all stakeholders through:

- Print copies of the AI and place in locations such as community centers, libraries, and City hall for the public to review;
- Communicate conclusions and recommendations to policy makers, planners, key city staff, community organizations, and the public;
- Provide access to a copy of the AI on the City's website;
- Provide a means other than public forums for other citizen participation (e.g. written comments, comment via the electronic and social media) regarding the conclusions and recommended actions resulting from the AI;
- Utilize alternative formats (e.g. braille, large type, tapes or readers) for persons with visual impairments; and
- Solicit broad-based community support for developing the fair housing action plan in order to meet the City's certification to "affirmatively further fair housing."

3. Set up Structure for Action Planning to Eliminate Identified Impediments

Prior to taking actions to address the identified impediments, the City should prepare the community for the process as follows:

- Develop a system for diverse community groups to be involved in the action plan process;
- Create a structure for the design and implementation of the actions or incorporate the design and implementation of housing and community development activities;
- Determine which local partners, subrecipients, and City departments will have primary and secondary responsibilities for designing and carrying out activities; and
- Ensure that partners and subrecipients solicit input from community stakeholders.

4. Establish Fair Housing Objectives and Goals

In determining actions to be taken to successfully address the impediments identified in the AI, the City should define a clear set of objectives with measurable and achievable results. According to the HUD *Fair Housing Planning Guide*, “the objectives should be directly related to the conclusions and recommendations contained in the AI. For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective.”²⁶

5. Determine Fair Housing Actions

The HUD *Fair Housing Planning Guide* outlines the following steps for determining fair housing actions which shall serve as guide for the City of Goldsboro:²⁷

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities.
- Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities.
- Schedule actions for a time period which is consistent with the City’s Five Year Consolidated Plan cycle.

²⁶ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

²⁷ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing For Fair Housing Planning, Page 2-22) March 1996*

FAIR HOUSING IMPLEMENTATION TRACKING

The City's AI Coordinating Function should be responsible for the oversight and tracking of the implementation of the fair housing action plan. The AI Coordinating Function will track the progress of the actions to address the impediments to fair housing choice. The purpose of the implementation tracking is to analyze the impact of the actions taken and demonstrate that the City has met its obligation to affirmatively further fair housing. This section describes the process for tracking the City's progress in carrying out the recommendations to address the impediments.

Ongoing Self-assessment

It is recommended that the City conduct an ongoing self-assessment annually to determine its progress in addressing the identified impediments and recommendations. The City's fair housing activities will be compared to the timelines stipulated in the fair housing action plan. If the City notices any deviations from the timeline, it should take the necessary steps to address any deficiencies or revise the timeline and document its files. Each recommendation in the AI includes a timeframe for completion in periods of one, three, and five-years, or on an ongoing basis.

Recordkeeping

A key element of the monitoring process is recordkeeping. The City should maintain a fair housing file where all actions taken are recorded and updates are made on a regular basis. HUD requires that at a minimum, the file contain:

- A copy of the AI; and
- Records that show the grantee has taken actions to overcome the effects of impediments identified in the AI.

City staff shall maintain information in the fair housing file through the use of the suggested Fair Housing Compliance File Checklist.

Reporting

In addition to the on-going self-assessment, the City will prepare its Consolidated Annual Performance Evaluation Report (CAPER), explaining how the jurisdiction is carrying out its housing and community development strategies, projects, and activities. As part of the report, the City must describe how it is carrying out its certification to affirmatively further fair housing by a) identifying the actions taken during the year; b) providing a summary of impediments to fair housing choice in the AI, and c) identifying actions taken to overcome effects of impediments identified in the AI.

Mid-period Assessment

The AI is typically updated every five years. However, much can change within a five year span of time and as such, it is recommended that the City conduct a mid-period assessment. The purpose of the mid-period assessment is to take a comprehensive look at the community in light of the changes that have been made due to the implementation of the actions outlined in the fair housing action plan and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice. The mid-period assessment should be conducted at the end of the third year of

implementation and should include the annual assessment for the year as well as a cumulative review of the actions taken and their impact for the three year period.

The City should compile and include the following in the mid-period assessment:

- Population demographic data relating to race, ethnic group, sex, age, and head of household;
- Characteristics of program beneficiaries;
- Affirmative marketing strategy and actions;
- Discrimination complaints filed and trends;
- Amendments or revisions to policies impacting land development, site selection, and zoning;
- Actions taken to affirmatively further fair housing; and
- Results of any needs assessments or studies for the area impacting fair housing.

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FAIR HOUSING COMPLIANCE FILE CHECKLIST

Grantee: _____ Fiscal Year: _____

DATE	DESCRIPTION
_____	Current Consolidated Plan section applicable to Fair Housing
_____	Analysis of Impediments to Fair Housing Choice
_____	Annual Resolution or Proclamation of Fair Housing Month
_____	A summary report of all activities related to the AI
_____	List of the actions taken during the program year
_____	Notice of public meetings showing the fair housing and equal opportunity logo. Should also include language providing for accommodations for persons with Limited English Proficiency, disabilities including the hearing impaired.
_____	Summary or transcript of all public meetings, hearings, and citizen comments or other public input
_____	Sign-in sheet or list of attendees at public meetings or hearings

Analysis of Impediments to Fair Housing Choice, FY 2015-2019

City of Goldsboro, NC

DATE	DESCRIPTION
_____	Fair housing brochures and publications including subrecipient educational material
_____	Information about housing discrimination complaints and the disposition of each
_____	Notice of training or workshops regarding fair housing and list of attendees
_____	Description of funding or fair housing providers and bi-annual reports from such agencies
_____	Studies or reports evaluating the impact of the actions undertaken including applicable sections of its required CDBG Annual Report CAPER to HUD.
_____	Other:

APPENDIX I: PLANNING AND ZONING QUESTIONNAIRE

FAIR HOUSING IMPEDIMENT STUDY

Review of Public Policies and Practices (Zoning and Planning Codes)

Name of Jurisdiction: City of Goldsboro, NC

Reviewing Agency: _____

Reviewer: _____

Date: _____

The Fair Housing Impediments Study reviews the Zoning and Planning Code and identifies land use and zoning regulations, practices and procedures that act as barriers to the development, the site and the use of housing for individuals with disabilities. The Study analyzes the Code and other documents related to land use and zoning decision-making provided by the participating jurisdiction. Additional information should be provided through interviews with Planning and Building and Safety Department staff and non-profit developers of special needs housing. In identifying impediments to housing for individuals with disabilities, the Study should distinguish between *regulatory* impediments based on specific Code provisions and *practice* impediments, which describe practices by the jurisdiction.

- Zoning Regulation Impediment: Does the Code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? **YES** ☐ **NO** ☐
- Zoning Regulation Impediment: Does the Code definition of “disability” the same as the Fair Housing Act.? **YES** ☐ **NO** ☐
- Practice Impediment: Are personal characteristics of the residents considered? **YES** ☐ **NO** ☐
- Practice Impediment: Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a “boarding or rooming house” or “hotel”? **YES** ☐ **NO** ☐
- Practice Impediment: Does the zoning ordinance deny housing opportunities for disability individuals with onsite housing supporting services? **YES** ☐ **NO** ☐
- Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled? **YES** ☐ **NO** ☐
- Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing? **YES** ☐ **NO** ☐

- Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? **YES** ☐ **NO** ☐

- Does the zoning ordinance address mixed uses? **YES** ☐ **NO** ☐

a. How are the residential land uses discussed?

b. What standards apply?

- Does the zoning ordinance describe any areas in this jurisdiction as exclusive? **YES** ☐ **NO** ☐

Are there exclusions or discussions of limiting housing to any of the following groups? **YES** ☐

NO ☐ If yes, check all of the following that apply:

Race ☐ Color ☐ Sex ☐ Religion ☐ Age ☐ Disability ☐ Marital or Familial Status ☐ Creed of National Origin ☐

- Are there any restrictions for Senior Housing in the zoning ordinance? **YES** ☐ **NO** ☐ If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)? **YES** ☐ **NO** ☐ If No, explain:

- Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? **YES** ☐ **NO** ☐

- Does the zoning ordinance establish occupancy standards or maximum occupancy limits? **YES** ☐ **NO** ☐ Do the restrictions exceed those imposed by state law? **YES** ☐ **NO** ☐ N/A ☐

- Does the zoning ordinance include a discussion of fair housing? **YES** ☐ **NO** ☐

If yes, how does the jurisdiction propose to further fair housing?

- Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking.

Analysis of Impediments to Fair Housing Choice, FY 2015-2019

City of Goldsboro, NC

- Does the zoning code distinguishes senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup). **YES** ☐ **NO** ☐
- Does the zoning code distinguishes handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)? **YES** ☐ **NO** ☐
- How are “special group residential housing” defined in the jurisdiction zoning code?

- Does the jurisdiction’s planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? **YES** ☐ **NO** ☐. Is there any provision for monitoring compliance? **YES** ☐ **NO** ☐

The jurisdiction should conduct a study of new housing construction over the last ten years to review compliance with the accessibility guidelines contained in the Fair Housing Act.

APPENDIX II: PUBLIC NOTICES

10A — Goldsboro News-Argus Friday, May 2, 2014



NOTICE OF PUBLIC MEETING Attention: All Goldsboro Residents

Analysis of Impediments to Fair Housing Choice (AI)

The City of Goldsboro will hold a Public Meeting on May 20, 2014 at 7:00 P.M. in the Large Conference Room of City Hall Annex on the Second Floor, (200 North Center Street). This meeting is intended to inform Goldsboro residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.



Entitlement communities like Goldsboro are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

Persons living and working in Goldsboro are encouraged to attend and provide input. Anyone unable to attend this meeting but wishing to make their views known may do so by submitting written comments to Shyelle Simpson-Clarke, Community Development Administrator for the Community Development Department located at 214 North Center Street, Goldsboro, NC, 27530 or email ssimpson@goldsboronc.gov.

If you require a language interpreter or you are an individual with a disability requiring auxiliary aids and/or services, please contact the City Manager's Office at City Hall Annex, 200 N. Center Street, Goldsboro, NC 27530 or by phone (919) 580-4330, at least five (5) business days prior to the meeting.

IF REQUESTED THIS DOCUMENT CAN BE PROVIDED IN AN ALTERNATIVE FORMAT

Friday, May 2, 2014 Goldsboro News-Argus — 3A



AVISO DE REUNIÓN PÚBLICA

Atención: Todos los residentes de Goldsboro

Análisis de los impedimentos a la opción justa de la vivienda (AI)

La ciudad de Goldsboro tendrá una reunión pública el 20 de mayo de 2014 a 7:00 P.M. en la sala de conferencias grande del anexo de City Hall en el segundo piso, (200 North Center Street). Esta reunión se piensa para informar a los residentes de Goldsboro sobre el análisis de impedimentos a la opción justa de la vivienda (AI), así como proporcionar una oportunidad para que todos puedan participar en el proceso de planificación de AI.



El Departamento Federal de Vivienda (HUD) requiere que las comunidades del distrito como Goldsboro preparen un AI cada cinco años. HUD define un impedimento a la opción justa de la vivienda como cualquier política, práctica, o decisión que restringe o tiene el efecto de la restricción la disponibilidad de las opciones de la unidad, sobre la base de la raza, del color, de la religión, del sexo, de la incapacidad, de la situación familiar, o del origen nacional.

Podríamos a las personas que vivan y que trabajen en Goldsboro a asistir y a participar. Alguien que no puede asistir a esta reunión, pero que desea dar a conocer sus puntos de vista puede hacerlo enviando escrito comentarios a Rhylene Simpson-Carter, administrador de desarrollo de la comunidad para el Departamento de desarrollo comunitario en 214 North Center Street, Goldsboro, NC, 27530 o correo electrónico rsimpson@goldsboronc.gov.

Si necesita un intérprete de lenguaje o si usted es un individuo con una discapacidad que requieren ayudas auxiliares y servicios, póngase en contacto con la oficina del administrador de la ciudad en City Hall, 200 N. Center Street, Goldsboro, NC 27530 o por teléfono (919) 580-4330; por lo menos cinco (5) días hábiles antes de la reunión.

SI ESTÁ PEDIDO ESTE DOCUMENTO SE PUEDE PROPORCIONAR EN UN ALTERNATIVO DE FORMATO.

COG 751410



BE MORE DO MORE SEYMOUR

North Carolina

**FY2015-2019 ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING CHOICE (THE AI)
FIFTEEN-DAY PUBLIC REVIEW**

The FY2015-2019 Analysis of Impediments to Fair Housing Choice (the AI) was prepared for the City of Goldsboro, to meet the requirements of the Housing and Community Development Act of 1974 and is a part of the City's certification to "affirmatively further fair housing (AFFH)." The City is a recipient of federal block grant funds including Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME) funds from the U.S. Department of Housing and Urban Development's (HUD) federal block grant funding administered through its Community Planning and Development (CPD) office. As such, it must certify that it will "affirmatively further fair housing" (AFFH) in accordance with federal regulatory requirements at 24 CFR 91.225(a) (1). With the certification, the City committed to conduct the AI within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

The AI is usually conducted in tandem with the Consolidated Plan, also required by HUD, and HUD recommends that the AI is updated at least once every three to five years. The previous AI was completed in July 2008." The basis of the AI is the federal Fair Housing Act and equivalent state and local laws. The City, through its Community Development Department, contracted with ASK Development Solutions, Inc. to assist City staff in conducting the activities related to and preparing the AI report. The recommendations from the report will be used as a basis for the City's development and implementation of a Fair Housing Plan (FHP).

The City of Goldsboro's draft of the AI will be available for public review and comment from October 16, 2015 through October 30, 2015. Copies can be found at public access sites such as the City of Goldsboro Planning Department, the Office of the City Clerk in the New City Hall Annex, 200 North Center Street, in the Community Development and Community Affairs Offices, City Hall, 214 North Center Street; at the Wayne County Public Library, 1001 East Ash Street; at the Goldsboro Housing Authority, 1729 Edgerton Street, Goldsboro; and on the City's website at www.goldsboronc.gov.

Any citizen who has a question about or comment on any information in the City of Goldsboro's draft of the AI may attach their comments to the draft report at these public access sites or may submit a written comment to the Community Development Department, 214 North Center Street, Goldsboro, NC, 27530, or email ssimpson@goldsboronc.gov. The Community Development staff can be reached by phone, at (919) 580-4318 between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday.

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APPENDIX III: PUBLIC FAIR HOUSING SURVEY QUESTIONS

CITY OF GOLDSBORO FAIR HOUSING SURVEY

1. Do you live within the limits of the City of Goldsboro?
2. Which ethnic, racial, or cultural group do you consider yourself a member of? Please check one:
3. What is your current marital status? Please check one.
4. Which income category does your total household income fall into? Please check one:
5. Are you or someone in your household a person with a disability /handicap?
6. Do you have children under the age of 18 years in your household?
7. Housing discrimination under the Fair Housing Act can only occur if someone is denied housing or housing financing based on which of the following categories (check all that apply):
8. Have you or anyone you know ever experienced housing discrimination in the City of Goldsboro?
9. If you answered "Yes" to the previous question, please answer the following: Which of the following best describes the person or organization that discriminated against you or the person you know?
10. What best describes the location of where the discrimination occurred?
11. What do you believe was the basis for the discrimination you or the person you know experienced?
12. If response to Question 11 is "Other", please check all that apply
13. What do you see as current impediments to fair housing choice, if any, within the City of Goldsboro?
14. Do you feel your housing choices are geographically limited to certain areas or neighborhoods in the City of Goldsboro?
15. Do you think that affordable housing options are located throughout the City of Goldsboro, or are they concentrated in certain areas/neighborhoods?
16. Do you perceive certain geographic areas or neighborhoods within the City of Goldsboro to be undesirable or are there areas where you would not wish to live?
17. Do you feel that there is an adequate supply of affordable housing that is available to: residents with disabilities, senior citizens, and residents with children? Why/why not?
18. What did you do, or would you do, if you were discriminated against in housing choice? (Check all that apply)
19. Are you familiar with housing related or social services provided by the City of Goldsboro?

Analysis of Impediments to Fair Housing Choice, FY 2015-2019

City of Goldsboro, NC

20. How much do you know about Fair Housing Laws, including City of Goldsboro Fair Housing Ordinance?
21. What information have you seen/heard regarding fair housing programs, laws, or enforcement within the City of Goldsboro? (check all apply)
22. Do you think that adequate fair housing information is available in other language translations?
23. In your opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms?
24. In your opinion/experience, have you seen advertising for housing that had images and human models that included your race or ethnicity?
25. What do you feel would be the most effective way to inform the residents of Goldsboro about their fair housing rights and/or responsibilities? (check all that apply):
26. Do you have any suggestions for changes to fair housing laws and practices that would increase fair housing choice and/or remove impediments to fair housing choice? If yes, please list:
27. Please list below what additional actions would you suggest that the City of Goldsboro could take to address impediments and improve fair housing choice for all residents:

APPENDIX IV: PUBLIC SURVEY TABLES

Table 52 – Survey Responses to Areas in which Housing Discrimination Occur

<i>Areas in Which Housing Discrimination Can Occur</i>	<i>% of Respondents</i>	<i># of Responses</i>
Color	78.0%	39
Religion	72.0%	36
Sex	70.0%	35
Disability/Handicap	76.0%	38
Familial Status (family with one or more children under 18 years of age)	70.0%	35
National Origin	62.0%	31
Age	62.0%	31
Sexual Orientation	62.0%	31
Poor English Language Skills	66.0%	33
Citizenship Status	44.0%	22
Level of Income	34.0%	17
Source of Income (public assistance)	60.0%	30
Other (please list)	46.0%	23

Table 53 – Survey Responses to the Person or Organization that Discriminated

<i>Which of the following best describes the person or organization that discriminated against you or the person you know?</i>	<i>% of Respondents</i>	<i># of Responses</i>
rental property manager/owner	80.0%	8
seller of a housing unit	20.0%	2
condominium or homeowner's association	0.0%	0
real estate professional	0.0%	0
loan officer or mortgage broker	0.0%	0
government employee	0.0%	0
other (please list)	20.0%	2

Table 54 – Survey Responses to the Location Where the Discrimination Occurred

<i>What best describes the location of where the discrimination occurred?</i>	<i>% of Respondents</i>	<i># of Responses</i>
a rental apartment complex	41.7%	5
an individual housing unit for rent	16.7%	2
an single family housing unit for sale	25.0%	3
a condominium for sale	8.3%	1

<i>What best describes the location of where the discrimination occurred?</i>	<i>% of Respondents</i>	<i># of Responses</i>
a real estate office	16.7%	2
a lending institution	8.3%	1
a public housing authority	41.7%	5
county owned/assisted housing	0.0%	0
city owned/assisted housing	0.0%	0
other (please list)	0.0%	0

Table 55 – Survey Responses to the Basis of Reported Discrimination

<i>What do you believe was the basis for the discrimination you or the person you know experienced?</i>	<i>% of Respondents</i>	<i># of Responses</i>
Race	50.0%	6
Color	16.7%	2
Religion	0.0%	0
Sex	0.0%	0
Disability/Handicap	8.3%	1
Family Status	8.3%	1
National Origin	0.0%	0
Other (not subject to the Fair Housing Act or local laws)	41.7%	5