CONSOLIDATED PLAN 2015-2020

Analysis of Impediments to Fair Housing

CITY OF FAYETTEVILLE

CUMBERLAND COUNTY

Community Development Departments

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CONSULTING
LLC

March 16, 2015

Analysis of Impediments to Fair Housing

City of Fayetteville

Cumberland County

North Carolina

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I. Introduction and Executive Summary of Analysis

A. Who Conducted

The following Analysis of Impediments to Fair Housing was conducted by the City of Fayetteville and Cumberland County, North Carolina with the assistance of an independent consultant, Karen Dash Consulting LLC of Wilmington, North Carolina (hereafter "study team.") The analysis was completed within the context of preparation for the HUD Consolidated Plans submitted by both jurisdictions for the 2015-2020 reporting period and per the Community Development Block Grant funding received by each.

B. Participants

In all, the opinions of nearly 300 community members informed the Consolidated Planning process. In preparation of the Consolidated Plan, the City of Fayetteville and Cumberland County consulted with 57 agencies through extensive interviews and two rounds of surveys. The two jurisdictions engaged in a robust process of including citizen participation within the Consolidated Planning Process. A series of five public meetings was held throughout Fayetteville in January, 2015, and eight public meetings were held throughout the county in winter-spring, 2015. The appendix provides a complete list of agencies consulted within the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing.

C. Methodology Used

Utilizing the Detailed Discussion of AI Areas, Chapter 5, within the Fair Housing Planning Guide, the study team conducted the following methodology for this analysis.

Review of Fair Lending Data: The team conducted a rigorous analysis of Home Mortgage Disclosure Act lending data available through the Consumer Financial Protection Bureau. The team also consulted with Reinvestment Partners, a nonprofit advocating economic justice in lending practices, regarding their opinion of the Fayetteville/Cumberland County Market.

Review of Demographic, Income, and Employment Data: The team conducted an extensive analysis of the demographics, income, and employment profile of the Fayetteville/Cumberland market, including a review of the geographic distribution of racial, ethnic, and income groups through detailed maps by census district.

Housing Profile: The team analyzed the particular housing demographics and profile of the region, which is heavily influenced by the presence of Fort Bragg and Pope Air Field and the large transient population moving into and out of the county each year, as measured by Internal Revenue Service county migration data.

Evaluation of the Jurisdiction's Current Fair Housing Legal Status/Fair Housing Enforcement: The team reviewed those complaints for which a charge or a finding of discrimination has been found. Additionally, we reviewed for any fair housing discrimination suits filed by the Department of Justice or private plaintiffs.

The study team interviewed and received data regarding local and statewide Fair Housing cases/actions from the Fayetteville/Cumberland Human Relations Commission; the North Carolina Human Relations Commission; and the North Carolina Fair Housing Project, a project of North Carolina Legal Aid. The

team also received data regarding federal Fair Housing cases through the US Department of Housing and Urban Development, Greensboro, NC.

The team reviewed for any trends or patterns within the data, including the resolution of cases.

Fair Housing Informational Programs: The team researched and evaluated the Fair Housing Informational Programs offered by the Fayetteville/Cumberland Human Relations Commission. The team also surveyed citizens regarding their awareness of Fair Housing laws and ways to seek assistance.

Review of Jurisdictional Laws and Codes: The study team conducted a rigorous review of the City and County's zoning and planning codes, laws, and regulations, including in-depth discussions with key zoning, planning, development, tax, and housing officials. Specifically, the team reviewed for impediments regarding:

- Zoning and Site Selection
- Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage
- PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders
- Sale of Subsidized Housing and Possible Replacement
- Property Tax Policies
- Planning and Zoning Boards
- Building Codes (Accessibility)

D. How Funded

The Analysis of Impediments to Fair Housing Project was funded by the City of Fayetteville's Community Development Department and the Cumberland County Community Development Department through their Consolidated Plan budgets.

E. Conclusions

IMPEDIMENTS FOUND – FAIR HOUSING CASES & RESOLUTION

- The Fayetteville-Cumberland County region appears to show some evidence of discrimination in terms of accessibility/disability issues as well as isolated instances of race discrimination in the rental market.

RECOMMENDATIONS: The Fayetteville/Cumberland County Human Relations Commission, along with the North Carolina Human Relations Commission and the North Carolina Fair Housing Project, may consider conducting additional training and distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens. Additionally, because many of the most recent cases tend to relate to issues of disability and accessibility, the City and County may wish to strengthen zoning ordinance focusing on housing accommodations for people with disabilities.

IMPEDIMENTS FOUND – ZONING & PUBLIC POLICIES

- It is believed that inclusionary zoning would inhibit development due to building costs and return on investment for developers and builders. There is no perceivable movement towards inclusionary zoning in the county or city.
- Nonprofit housing suppliers have identified a deficiency in lending availability that prevents many prospective buyers from obtaining homeownership. Deficiencies include lending restrictions based on credit scores and income.

RECOMMENDATIONS

- It is recommended that emphasis on inclusionary zoning be replaced with emphasis on subsidized new housing to replace the districts older housing stock. Due to the relative high-cost of building as compared to return on investment, newer subsidized housing would depend on grants, tax relief, accessible loans, and developer incentive.
- Recommend evaluation of lending availability as compared to the areas perspective affordable housing buyer, and provide suitable lending options that may include poor credit options and rent to own options.

IMPEDIMENTS FOUND – PUBLIC TRANSPORTATION

The city of Fayetteville transit PLANS to add fixed route service on Sundays. Sundays are not currently served by fixed route buses, however these services are needed to provide transportation to employment.

Cumberland County offers limited transportation services through grants. The county has severe budget limitations that prevent it from operating sufficient transportation options. It is believed the counties programs do not satisfy the needs of the public who live beyond the city limits. In all cases, County residents must make advanced arrangements for transportation services. All transportation services in the county jurisdiction are provided through grant and have financial limitations that impact service availability.

Recommendations for City of Fayetteville transit system.

1. Greater frequency – more routes with 30-minute headways
2. Later evening service to provide transportation from employment.
3. Sunday service to provide transportation to and from employment.
4. Flexibility to respond to emerging mobility needs
5. Service into unserved areas of the county with higher density to provide transportation to and from employment.

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Recommendations for Cumberland County transit system

- Development of a 5 & 10 year comprehensive plan to provide adequate and effective transportation for employment and medical purposes.
- A partnership with the city of Fayetteville to extend city fixed route services to densely populated areas of the county within 2 miles of city limit.

Impediments Found – LENDING PRACTICES

- An analysis of decline rates by race and income shows that, for some income bands, American Indian or Alaska Native, Black or African American, and Asian applicants were declined as disproportionately higher rates, and that the first two groups as a whole were declined at disproportionately higher rates.
- It is unclear at this time whether predatory lending exists; additional analysis is required to determine the pattern of loans being offered within various affected groups.

RECOMMENDATIONS: The City and County's Human Relations Commission, along with the North Carolina Human Relations Commission and the Reinvestment Partners group, may consider distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens.

While it is unclear if predatory lending is a concern, information regarding predatory loans would also help vulnerable groups to achieve fair lending for their home purchase.

II. BACKGROUND: FAIR HOUSING IN THE UNITED STATES, NORTH CAROLINA, AND FAYETTEVILLE/CUMBERLAND COUNTY

Fair Housing in the United States

In the United States, access to housing is a right enshrined in law. Affirmatively furthering fair housing is a fundamental foundation to HUD's housing and community development programs.

In an effort to create equal access to housing, Congress enacted the Fair Housing Act (the Civil Rights Act of 1968) and the Fair Housing Amendments Acts of 1988 to prevent housing discrimination based on race, color, religion, national origin, sex, familial status, or disability. A recent analysis by HUD, which broke down housing complaints by HUD region, revealed that half of the fair housing complaints were generated by 20% of the HUD regions which consisted mainly of Midwestern and Southern states.

In recent years, Fair Housing has taken a broader policy approach analyzing broader barriers, such as mortgage lending policies, rental policies, and city and government practices which have prevented groups as whole from accessing housing; versus past individual barrier analysis. This has led to actions which have the potential to increase Fair Housing effectiveness: for example, congressional housing investigation funding, and more than doubling their number of HUD Secretary- initiated complaints.

HUD has more than doubled its number of Secretary-initiated complaints in 2013 from 16 to 37, which include case filings against SunTrust Mortgage, TriTex Real Estate Advisors, Plaza Home Mortgage, Southport Bank, Chevy Chase Bank, and Housing Authority of the City of Ruston. In addition, in 2013, several nonprofit fair housing organizations initiated cases challenging zoning ordinances, housing choice voucher discrimination, and discriminatory targeting of toxic and overpriced mortgages. There were also cases for the first time in regards to bank owned discriminatory practices and investigation into the deaf and hard of hearing discrimination.

In July 2013, HUD issued draft regulation to implement the "affirmatively furthering fair housing" provision of the Fair Housing Act. This draft received broad feedback from civil rights', fair housing, women's, disability, LGBT, consumer, and labor organizations. The draft includes a clear definition of fair housing, specifications for application of community resources, posting requirements for public housing authority's plans with the Assessment of Fair Housing (AFH), AFH consultation with organizations representing the protected classes, and the inclusion of other relevant local data by AFH organizations in their assessments.

For the last two years, private fair housing organizations have investigated 69% of all housing discrimination complaints. This is more than twice as many as all governmental agencies as a whole. The average fair housing organization consist of five staff members with extensive local knowledge enabling effective and efficient investigations and interaction with local groups, such as real estate professionals and landlords.

Overall, complaints of housing discrimination remained steady in 2013, dipping only slightly below 2012, but remaining above 2011 levels. Private housing organizations have seen complaints increase in real estate sales, homeowner's insurance and housing provider advertisements; while decreasing in rental and mortgage transactions, and harassment complaints. Fair Housing Assistant Program has seen

complaints decrease in all categories, except home owner's insurance, with 1,200 individual Department of Justice complaints and 43 fair housing cases filed by the Department of Justice in 2013.

Table 1 breaks out the percentage of complaints for Fair Housing Organizations (NFHA), claims for Department of Housing and Urban Development (HUD) and Fair Housing Assistance Program (FHAP), and case filings by Department of Justice (DOJ) for 2013.

Discrimination by Protected Class (Table 1)

BASIS	NFHA Members	HUD	FHAPs	DOJ
Race	19.3% (3,656)	26.8% (504)	28.3% (1,838)	40% (14)
Disability	48% (9,088)	53.5% (1,006)	52.8% (3,429)	43% (19)
Familial Status	11.1% (2,097)	14.9% (280)	13.4% (868)	17% (7)
Sex	5.6% (1,064)	11.6% (219)	11.8% (767)	6% (2)
National Origin	7.1% (1,339)	25.1% (472)	18.4% (1,198)	17% (6)
Color	1.6% (301)	1.9% (36)	2.1% (135)	NA (0)
Religion	0.9% (169)	1.7% (32)	2.9% (189)	6% (2)
Other*	6.4% (1,218)	13.1% (246)	10.5% (684)	0% (0)

* The "other" category for NFHA members represents complaints arising from categories protected at the state and local levels, including age, criminal background, ancestry , "alienage", military status, victim of domestic violence, student status, lawful occupation, place of residence, family responsibility, and arbitrary. ("Arbitrary" is a catchall class under California state law in rental transactions.) Retaliation complaints reported by fair housing organizations are categorized in the applicable protected class. The "other" category for HUD and FHAP complaints represents complaints of retaliation, which may not necessarily have a tracked protected class basis. NFHA member data are for calendar year 2013. HUD, FHAP, and DOJ data are for fiscal year 2013. Totals may exceed 100 percent because a single complaint may allege multiple bases of discrimination.

Table 2 below documents the number of Fair Housing cases in which HUD issued a charge by year.

Charged Cases (Table 2)

Fair Housing Act Cases in Which HUD Issued a Charge										
2003	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**
23	43	47	34	31	48	54	45	55	43	37

Table 3 below illustrates the number of cases filed by DOJ between 2002 and 2014

DOJ Cases Filed (Table 3)

Total DOJ Cases Filed by Year											
2002	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**
49	29	38	42	31	35	33	45	30	41	36	43

HUD has an important task with its "affirmatively furthering fair housing" regulation to move the nation closer to the Fair Housing Act's two main goals: eliminate housing discrimination and build diverse, inclusive communities. Investigating approximately 30,000 fair housing complaints is a tremendous accomplishment, but more funding is needed for education and enforcement in the US and to decrease the regional disparity. It has been recommended that the Consumer Protection Financial Bureau begin collecting additional fair lending data, and that HUD implement regulation addressing sexual housing discrimination. As history has illustrated, Fair Housing Organizations working together can and do make a significant impact when working together to reduce housing discrimination. Research indicates these opportunities for improvement are attempting to be addressed, which will assist in future reduction of housing discrimination.[1]

In North Carolina, an additional provision provides for "except as otherwise provided by law, the fact that a development or proposed development contains affordable housing units for families or individuals with incomes below 80 percent of the area median housing income."

Fair Housing in North Carolina

A 2010 analysis of Fair Housing in North Carolina[2] noted that fair housing issues are still a concern for citizens and policymakers, including 800 complaints from 2004 to 2009. The majority of those complaints concerned racial discrimination in the lending market; a lack of enforcement of fair housing laws, and zoning and land use restrictions. Complainants also suggested that Fair Housing Laws were confusing and unclear and that more education would be helpful. More recent data from the North Carolina Human Relations Commission suggests that issues of access for people with disabilities are ongoing concern.

The 2010 North Carolina study suggested the following systemic impediments to Fair Housing statewide.

- Lack of capacity – A lack of resources and personnel in fair housing departments has hampered comprehensive outreach and educational efforts.
- Discrimination in Rental Markets – This discrimination is primarily directed toward racial and ethnic minorities and people with disabilities, the latter for whom landlords might not make reasonable accommodations.
- Constraints in the Lending Market – Racial and ethnic minorities experienced disproportionately higher rates of home mortgage application declines, even after adjusting for income. Applicants in low-income neighborhoods were especially affected. Additionally, racial and ethnic minorities were often offered higher interest rate loans with less favorable terms.
- Possible Barriers in Land Use and Zoning Policies or Practices – Policies or restrictions might inhibit the development of fair housing

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[1] Much of the previous discussion was adapted from National Fair Housing Alliance. *Fair Housing Trends Report 2014: Expanding Opportunity: Systematic Approaches to Fair Housing.* Washington, DC: National Fair Housing Alliance, August 13, 2014. retreived from http://www.nationalfairhousing.org/Portals/33/2014-08-13_Fair_Housing_Trends_Report_2014.PDF

[2] Western Economic Services, 2010 North Carolina Analysis of Impediments to Fair Housing Choice

In 2013, the Fair Housing Working Group was established in North Carolina to provide coordinated investigation, analysis, and action into allegations of fair housing violations. Additionally, the group provides education to citizens, housing organizations, and other nonprofits working to advance fair housing for all people regardless of background.

Member organizations include:

Governmental Agencies

- U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Greensboro
- Asheville-Buncomb Community Relations Council
- Charlotte Mecklenberg Community Relations Commission
- Durham Human Relations Commission
- Fayetteville-Cumberland Human Relations Department
- Greensboro Human Relations Department
- High Point Human Relations Department
- North Carolina Commerce Department, Division of Community Assistance
- North Carolina Housing Finance Agency
- North Carolina Human Relations Commission
- Orange County Human Relations Commission
- City of Raleigh Fair Housing Hearing Board
- Winston-Salem Human Relations Commission

Non-Governmental Agencies

- Fair Housing Project of Legal Aid of North Carolina
- Reinvestment Partners

Fair Housing in City of Fayetteville/ Cumberland County

The 2010 Analysis of Impediments to Fair Housing for the City of Fayetteville and Cumberland County suggests the following impediments:

- Accessibility to Effective Public Transportation
- Expanding Affordable Housing Choices
- Lack of Public Education/NIMBYism
- Mortgage Lending
- Land Use and Zoning

III. The Analysis of Impediments Process

As part of the HUD consolidated planning process, states and entitlement communities receiving Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), must submit to HUD certification that they are affirmatively furthering fair housing.

The development of this Analysis of Impediments to Fair Housing Choice (AI) is the first of three components of that certification. Additionally, the Cumberland County-Fayetteville team must take actions to resolve the effects of any impediments to fair housing identified through this AI and maintain records regarding the analysis and actions taken.

In short, HUD will recognize that the City of Fayetteville and Cumberland County are affirmatively furthering fair housing by:

- Analyzing, identifying, and eliminating housing discrimination within the City and County
- Promoting fair housing choice for all persons
- Providing opportunities for racially and ethnically inclusive patterns of housing and occupancy
- Promoting housing that is physically accessible to all persons to include those persons with disabilities
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act

Definitions

As defined in The Fair Housing Planning Guide, the definition of Affirmatively Further Fair Housing (AFFH) requires a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction
- Take appropriate actions to overcome the effects of any impediments identified through the analysis
- Maintain records reflecting the analysis and actions taken in this regard

As described in the Fair Housing Planning guide, the CHAS statute at Section 104(21) defines the terms "certification" within the context of the Certification to Affirmatively Further Fair Housing (AFFH) to be:

- A written assertion
- Based on supporting evidence
- Available for inspection by the Secretary, the Inspector General, and the public
- Deemed accurate for purposes of this Act unless the Secretary determines otherwise after:
    1. Inspecting the evidence
    2. Providing due notice and opportunity for comments

In carrying out its local Analysis of Impediments to Fair Housing Choice, Cumberland County and the City of Fayetteville utilized the following definition of Fair Housing Choice as outlined by HUD:

- The ability of persons at similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap

As defined in The Fair Housing Planning Guide, the definitions of impediments to fair housing choice include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Limitations of This Analysis

The following information was prepared for the purposes outlined above in accordance with HUD requirements. Therefore, this report seeks to identify impediments and develop a proposed Fair Housing Action Plan as proposed solutions. Many of the impediments outlined in this report will require additional research and ongoing analysis by the City and County's Community Development Staff. This report does not constitute a comprehensive planning guide but simply provides analysis as to the current situation and prepares a plan of action to address existing impediments.

IV. JURISDICTIONAL BACKGROUND DATA

Overview of the City of Fayetteville and Cumberland County

Cumberland County and the City of Fayetteville have a rich and varied history. Named for the Duke of Cumberland, the county was designated by the Colonial Legislature in 1754. In 1783, the County seat of Campbellton was renamed Fayetteville in honor of Marquis De la Fayette, a French general who served in the American Revolutionary War.

The heart of Cumberland County is the Fort Bragg military installation in Fayetteville, which is home to 39,457 people, according to the 2010 Census, including the US Army and Special Forces. Fort Bragg became a permanent Army post in 1922.

Encompassing 661 square miles, the County is home to 325,871 people[3]. Cumberland County is home to nine cities: Eastover, Falcon, Fayetteville, Godwin, Hope Mills, Linden, Spring Lake, Stedman and Wade. Eleven townships also include Beaver Dam, Black River, Carvers Creek, Cedar Creek, Cross Creek, Eastover, Gray's Creek, Manchester, Pearces Mill, Rockfish, and Seventy-First.

The City of Fayetteville, home to 204,408 people[4], has received the prestigious All-America City Award from the National Civic League three times. The city is situated in the North Carolina Sandhills and is built on the Cape Fear River.

A. Demographic Data

According to 2013 US Census data, Cumberland County is home to 325,871 people, which represents an increase of 2% over the 2010 Census count. The county's population is more heavily weighted to younger people than that of the state overall, and it enjoys a more diverse population than that of other North Carolina counties. While the county's overall population is 3.3% of that of North Carolina, the county is home to 5.77% of the state's veterans (42,655).[5]

The county's population is more heavily weighted to younger people than that of the state overall, with 8.2% of the population under the age of 5 (vs. 6.2% in NC) and 26% under 18 (vs. 23.2% in NC).

The racial composition of Cumberland County is more diverse than that of the state overall, with whites representing 53.6% (vs. 71.7% in NC) and Black/African Americans comprising 37.4% of the population (vs 22% statewide.) Hispanic/Latinos represent 10.7% of the population (vs 8.9% statewide).

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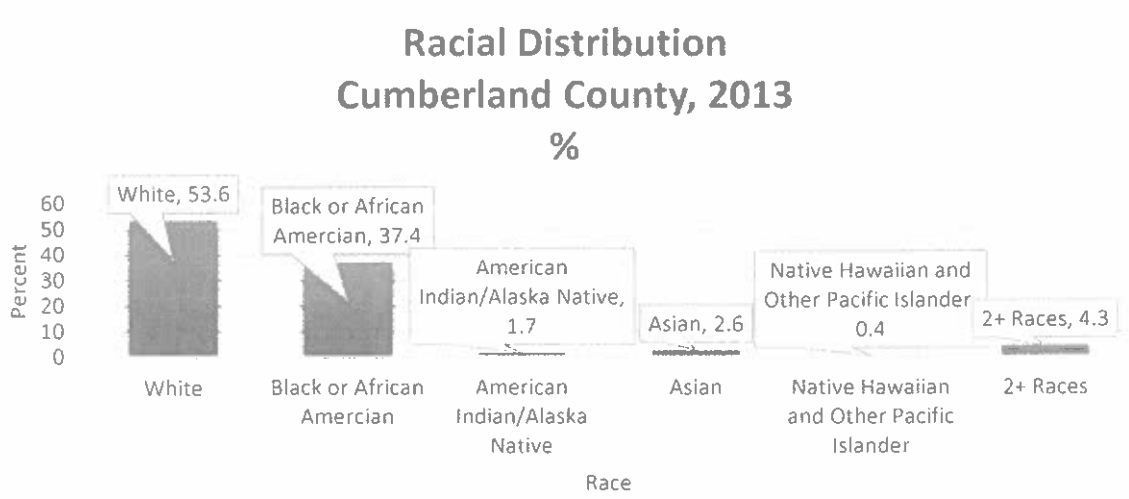
[3] 2013 estimate, http://quickfacts.census.gov/qfd/states/37/37051.html

[4] 2013 estimate, http://quickfacts.census.gov/qfd/states/37/3722920.html

[5] http://quickfacts.census.gov/qfd/states/37/37051.html



The Appendix provides 2010 Census demographic information for the nine cities of Cumberland County. Among the highlights of that data:

The populations of the nine cities are quite varied, signaling different community experiences.

- At 200,566 people, Fayetteville is over thirteen times larger than the next biggest town of Hope Mills, with 15,176 residents, followed by Spring Lake with 11,964 residents. The four smallest towns, Linden (130), Godwin (139), Falcon (258) and Wade (556) together represent 1,083 residents.
- Falcon has the highest percentage of residents under 18 (36.82%) and Linden has the highest percentage of residents 65+ years old (20.77%).
- Fayetteville has the most diverse population, with 41.9% African American/Black residents; 1.08% American Indian or Alaska Native; 2.6% Asian; 0.45% Native Hawaaian or Other Pacific Islander; 3.3% Some Other Race; 45.7% White; 4.93% two or more races. Additionally, 10.10% identified as having Hispanic or Latino ethnicity.
- Stedman has the least diverse population, with 11.67% African American/Black residents; 1.07% American Indian or Alaska Native; 0.68% Asian; 0.19% Native Hawaaian or Other Pacific Islander; 0.97% Some Other Race; 83.17% White; 2,24% two or more races. Additionally, 3.21% identified as having Hispanic or Latino ethnicity.

The next several pages of maps at the end of this section show the racial distribution by Census Tract within the City of Fayetteville and Cumberland County.

As the maps show,

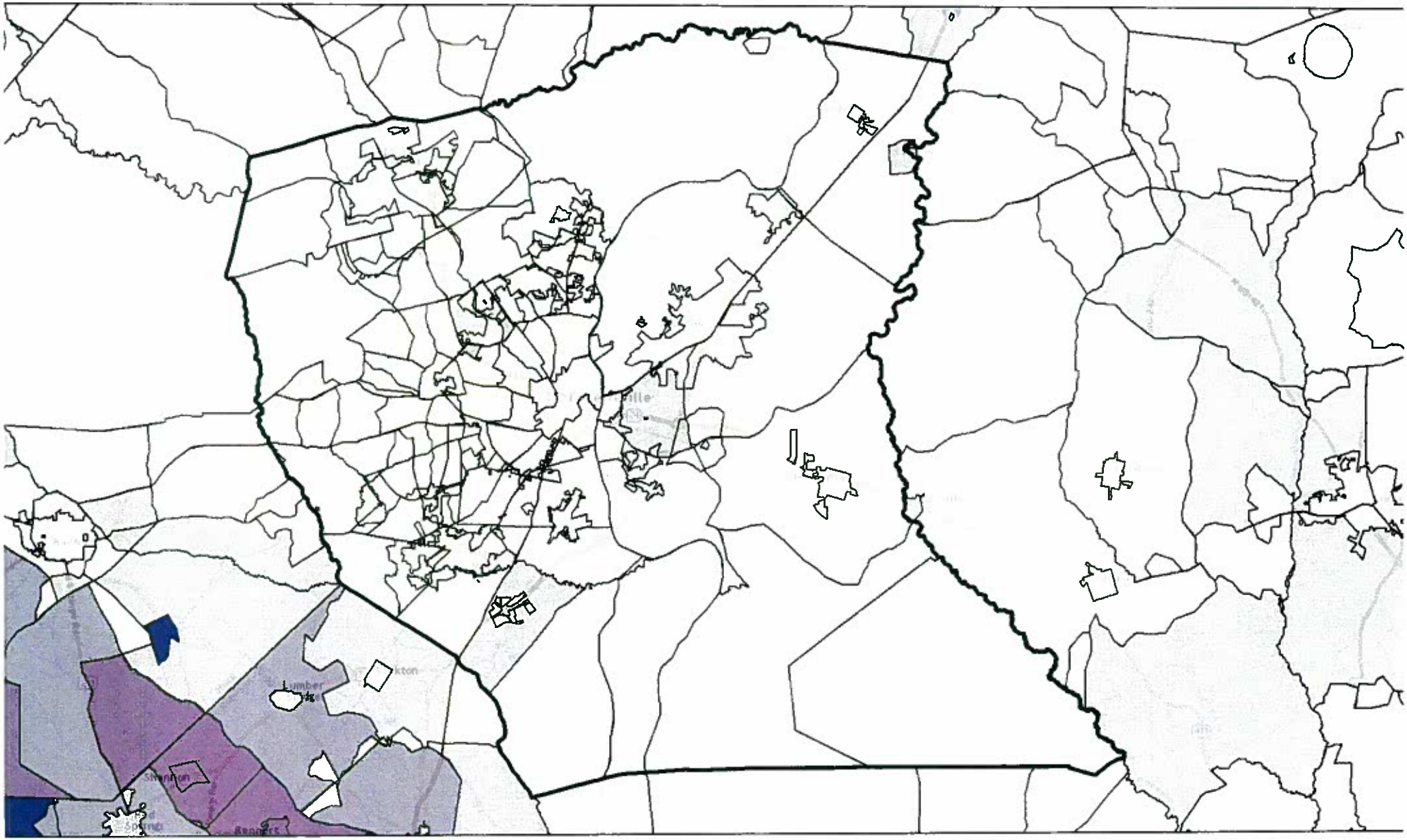
- the largest share of Asian population is west of downtown Fayetteville; near Fort Bragg; to the east of Eastover; and in West Fayetteville, with the greatest share in Census Tract 20.01
- the largest concentration of American Indian/Alaska Native residents is east of downtown Fayetteville, including Census Tracts 14, 25.03, and 25.04
- the largest concentration of Black or African-American residents is within the downtown Fayetteville, along the Murchison Road corridor, the Bonnie Doone and Massey Hill areas, and in Spring Lake, including Census Tracts, 2, 10, 11, 12, 24.01, 24.02, and 38,

- the largest concentration of Native Hawaiian/Pacific Islander residents is in Spring Lake, and in pockets of Western Fayetteville, including Census Tract 20.02
- the largest concentration of people identifying as Some Other Race is to the west of downtown Fayetteville, Western Fayetteville, and the Bonnie Doone area, including Census Tracts 24.02 and 7.02
- the largest concentration of White residents are in Eastover, pockets of Western Fayetteville, and the Falcon, Godwin, and Linden areas, including Census Tract 18
- the largest concentration of people of two or more races is scattered throughout the county, including Hope Mills, west of Fort Bragg, Western Fayetteville, and Bonnie Doone, including Census Tracts 22 and 23
- the largest concentration of persons of Hispanic/Latino ethnicity are in areas to the northeast and southwest of Bonnie Doone, in the downtown Fayetteville area, and throughout Western Fayetteville, Spring Lake, and Hope Mills, including Census Tracts 14 and 24.02

CONCLUSIONS

- People living within Fayetteville tend to have different experiences than those outside the county in terms of the diversity of its community
- Fayetteville, with two-thirds of the county's population, is 13X bigger than the second largest town in the county, Hope Mills
- The largest concentrations of minority residents appear to be in the downtown Fayetteville and Spring Lake areas, particularly in Census Tracts 24.02, 2, and 38.
- The largest concentration of white residents tends to be in the towns northeast of Fayetteville, including Falcon, Godwin, and Linden
- Fayetteville is a diverse community, although some areas that are heavily concentrated toward minorities also tend to be some of the lowest income areas (see next section for detailed analysis)

CPD Maps - Cumberland County - American Indian/Alaska Native (not Hispanic) Population



ebruary 24, 2015

Override 1 **AmericanIndianAlaskaNativeAlone**

B03002EST5_PCT

<3.55%

3.55-15.44%

15.44-39.78%

39.78-74.01%

>74.01%

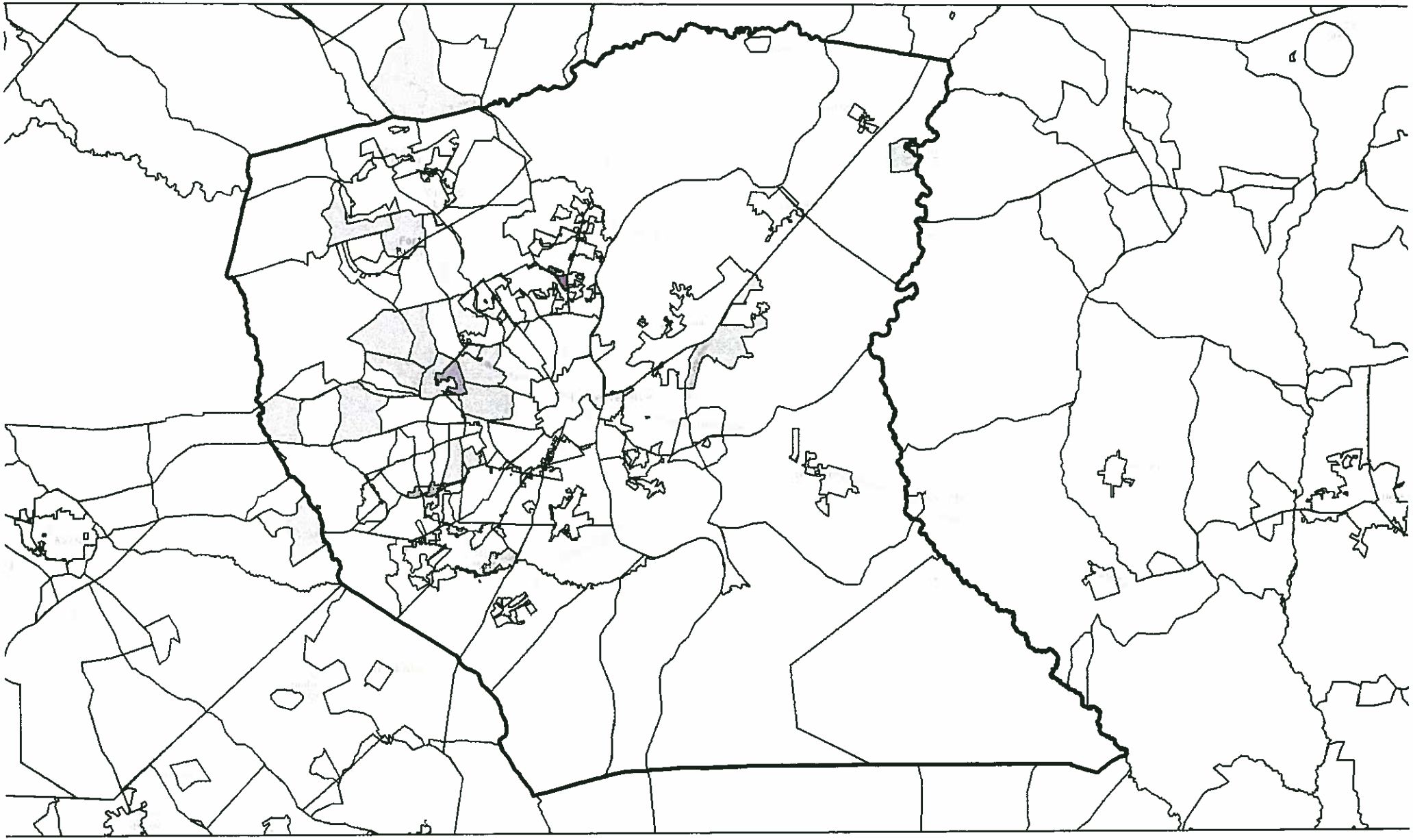
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Asian (not Hispanic) Population



ebruary 24, 2015

Override 1 **AsianAlone**

B03002EST6_PCT

<3.41%

3.41-11.99%

11.99-27.12%

27.12-52.24%

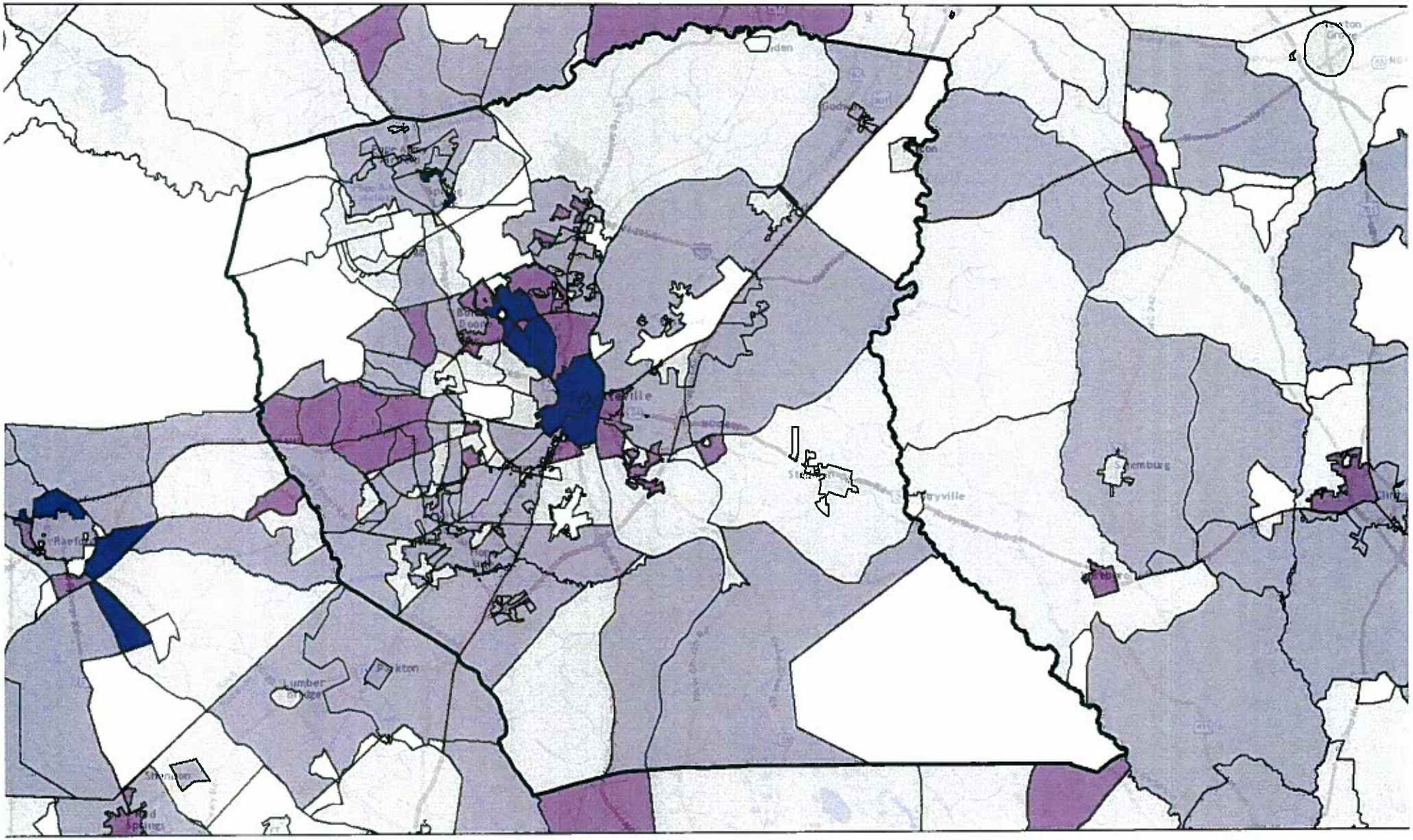
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Black or African American (not Hispanic) Population



ebruary 24, 2015

Override 1 **BlackAfricanAmericanAlone**

B03002EST4_PCT

<6.85%

6.85-22.6%

22.6-45.37%

45.37-74.1%

>74.1%

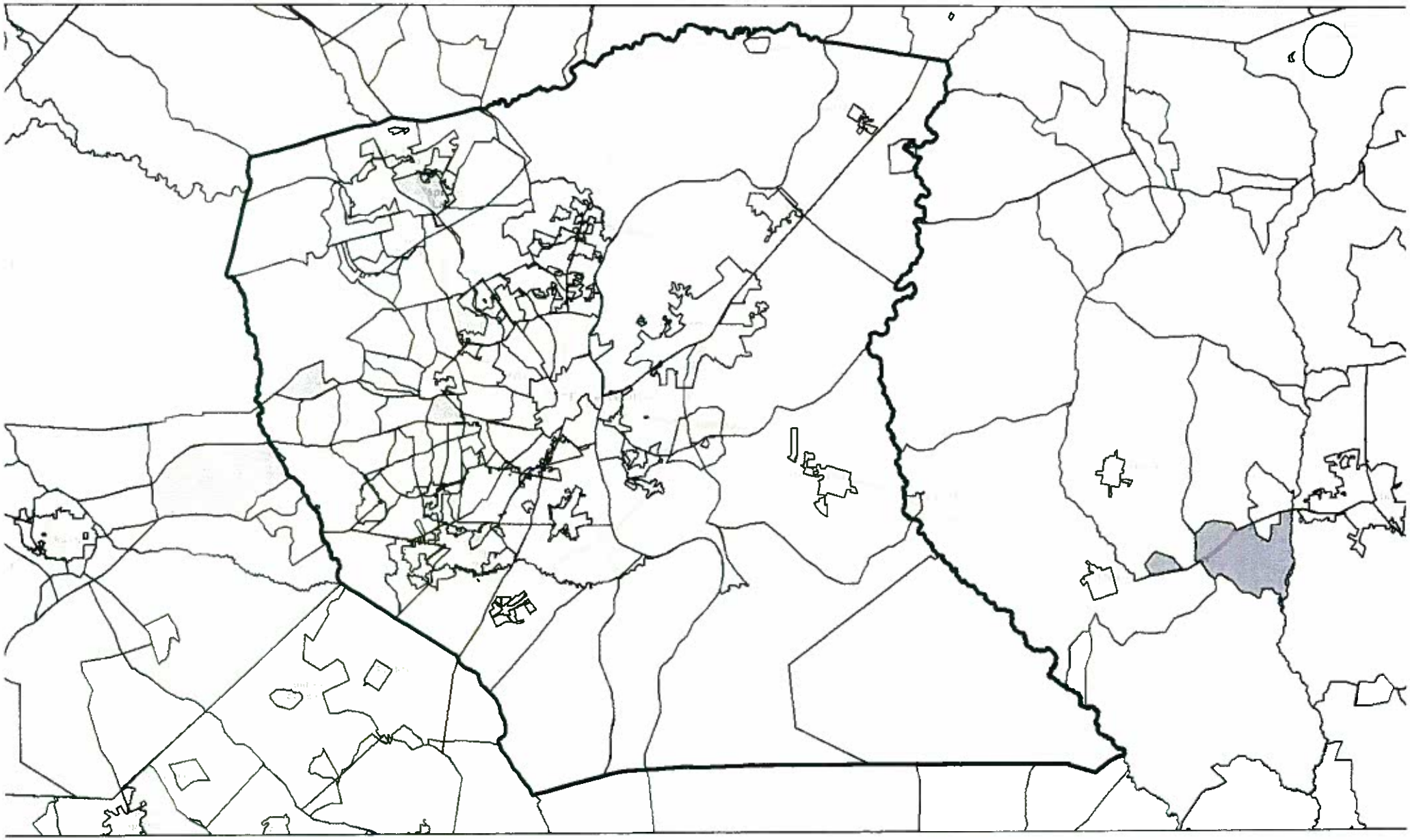
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Native Hawaiian/Pacific Islander (not Hispanic) Population



ebruary 24, 2015

Override 1 **NativeHawaiianPacificIslanderAlone**

B03002EST7_PCT

<1.46%

1.46-6.13%

6.13-16.3%

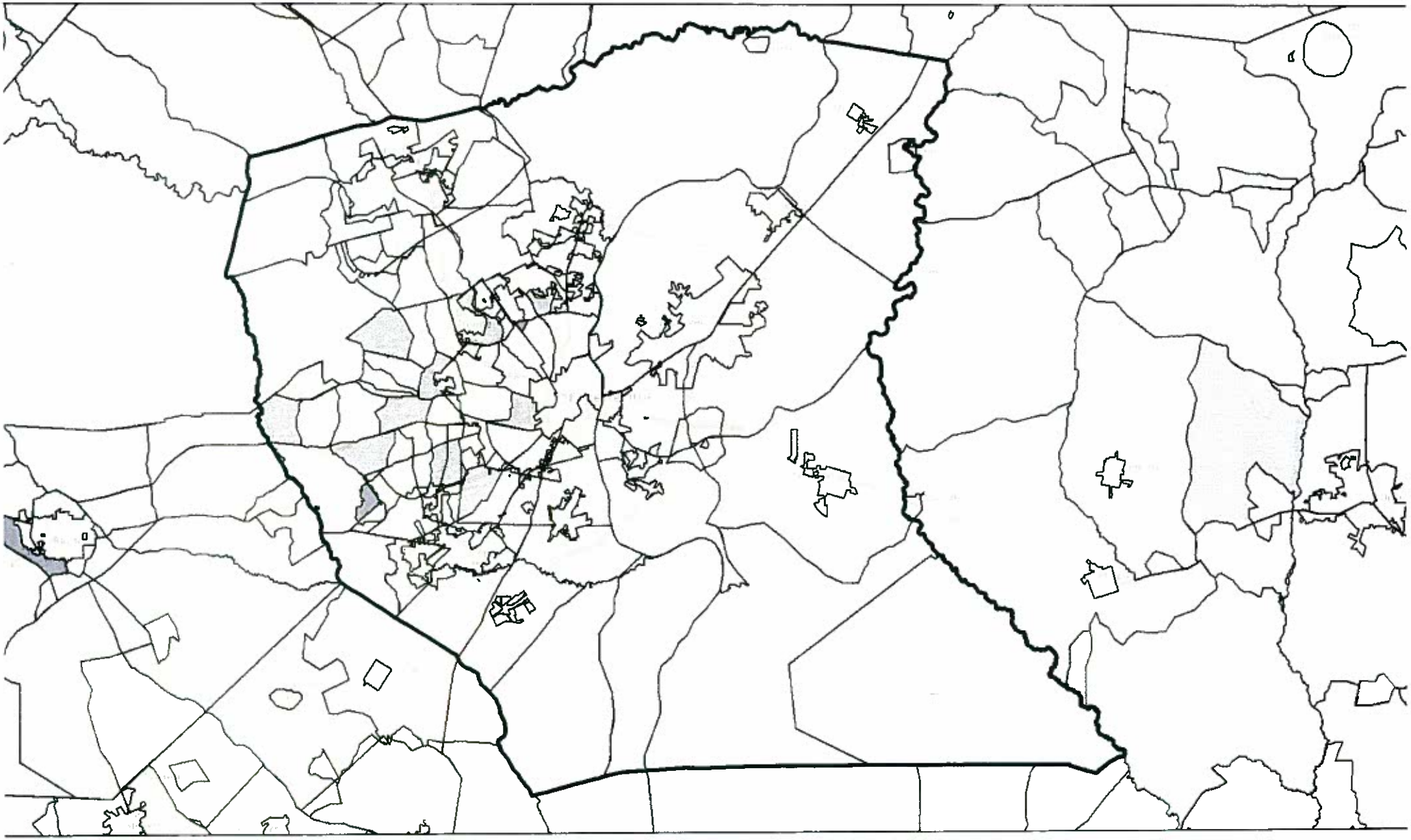
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Some other race alone (not Hispanic) Population



ebruary 24, 2015

Override 1 **OtherRace**

B03002EST8_PCT

<0.93%

0.93-4.27%

4.27-14.29%

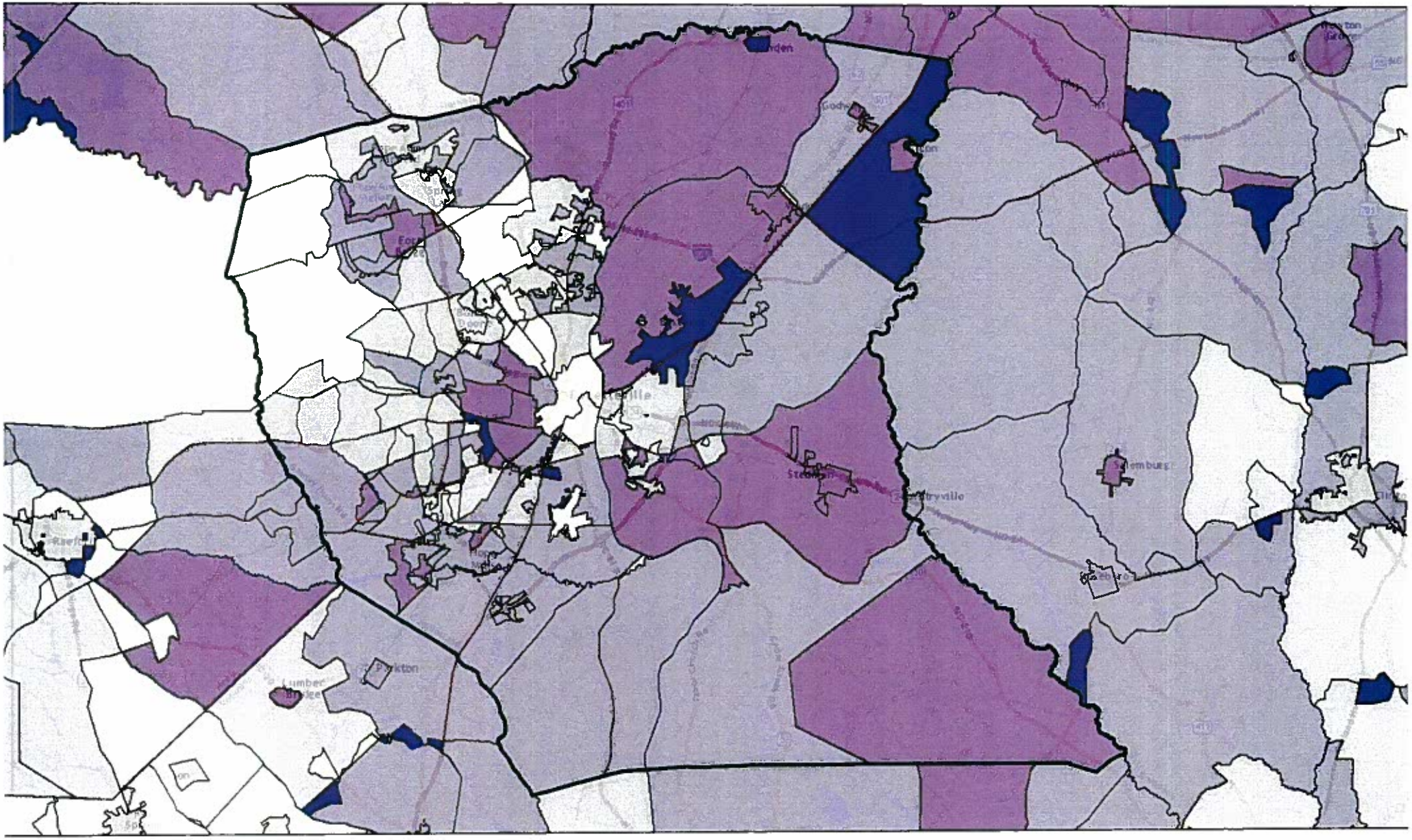
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - White alone (not Hispanic) Population



ebruary 24, 2015

Override 1 **WhiteAlone**

B03002EST3_PCT

<16.61%

16.61-44.79%

44.79-69.3%

69.3-88.57%

>88.57%

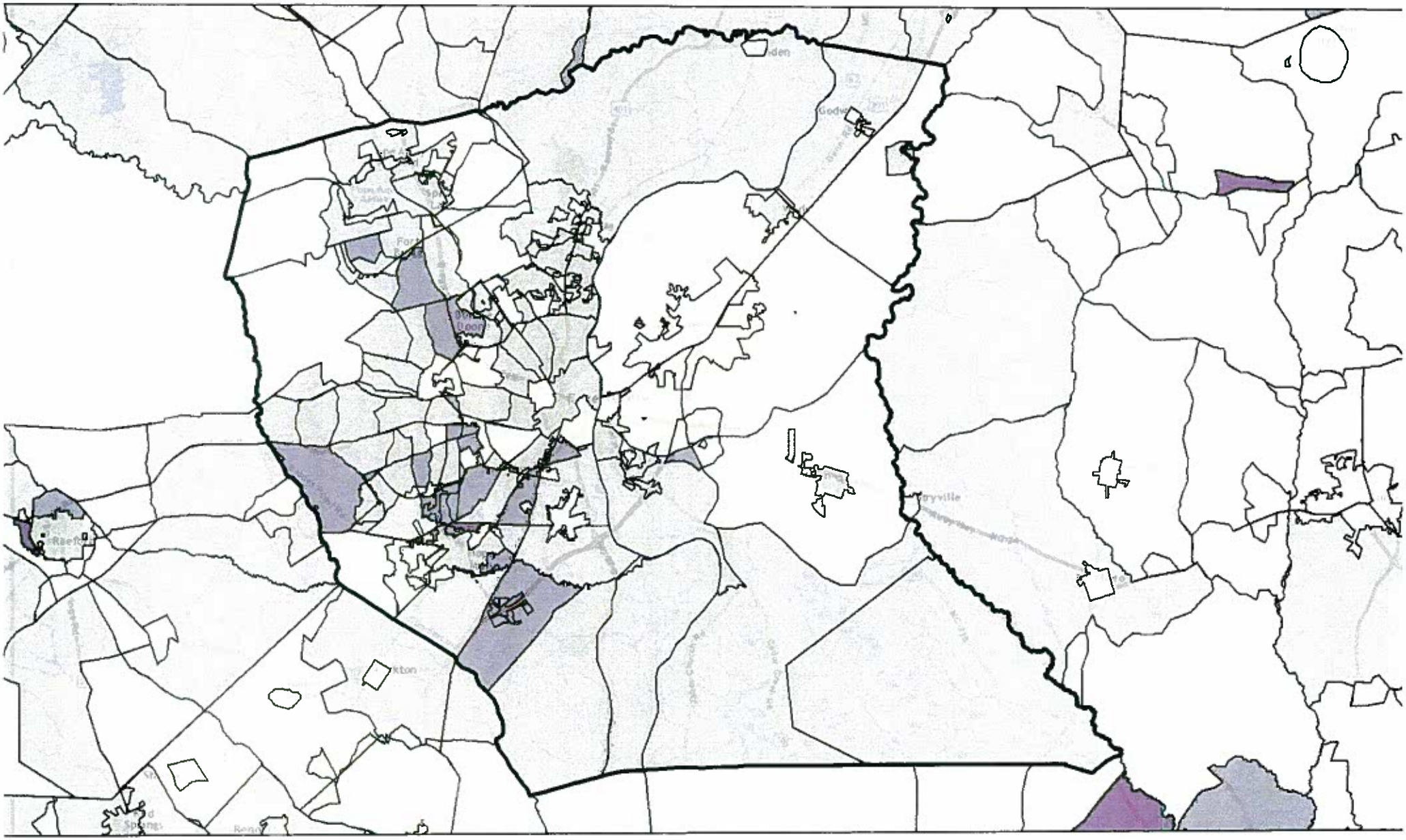
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Two or more races (not Hispanic) Population



ebruary 24, 2015

Override 1 **TwoOrMoreRaces**

B03002TMNH_PCT

- <1.8%
- 1.8-6.71%
- 6.71-18.24%
- 18.24-45.63%

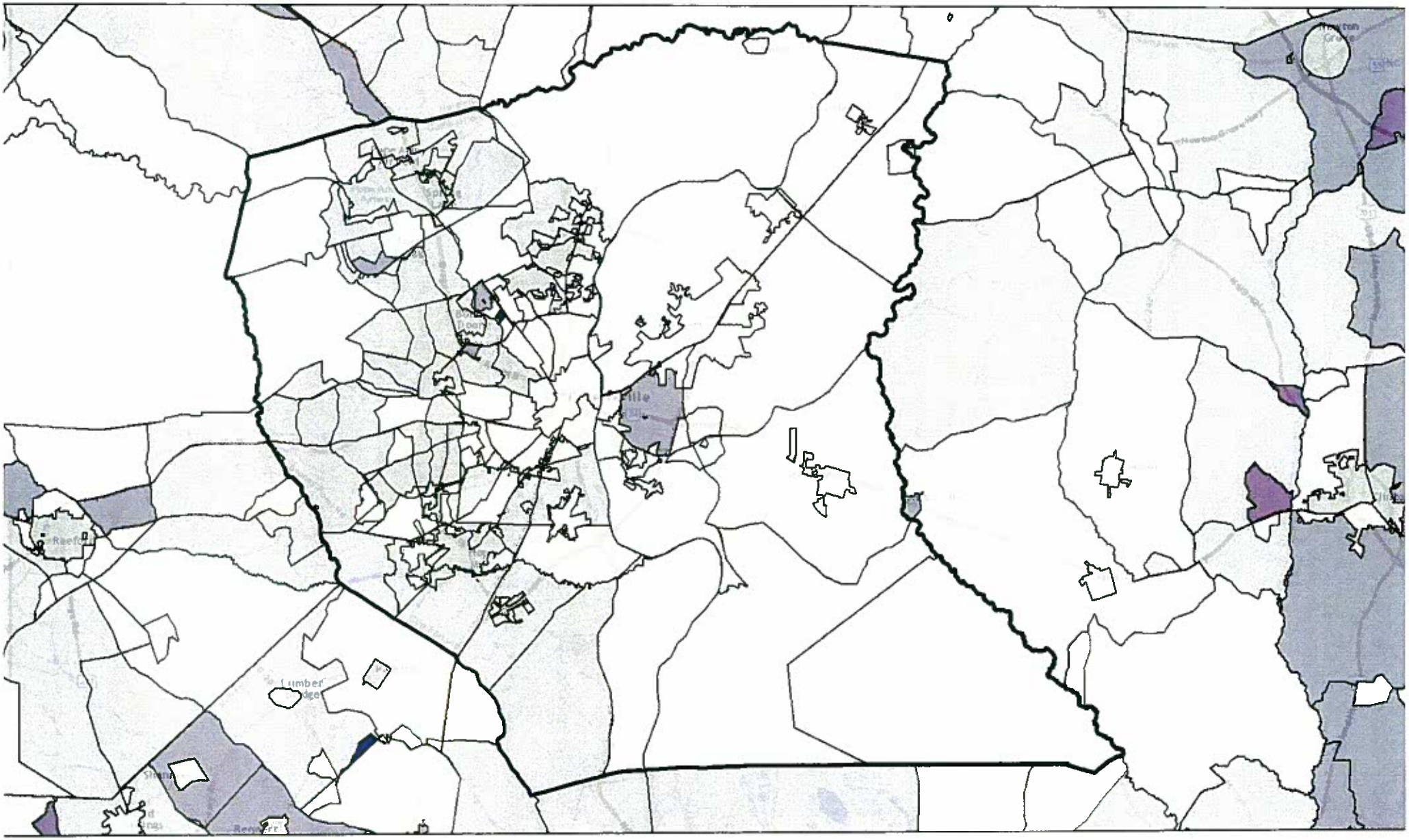
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Persons of Hispanic Origin Population



ebruary 24, 2015

Override 1 **HispanicOrigin**

B03002EST12_PCT

<7.12%

7.12-23%

23-46.54%

46.54-76.83%

>76.83%

1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

B. Income

Within the City of Fayetteville, the median family income in 2013 was $44,900; in the county overall, the median family income was $45,321. Approximately 17% of county residents are living below the poverty line and the unemployment rate as of December 2014 was 6.1%.

Racial or ethnic minorities are located in various census tracts throughout the City, and several tracts with high-minority concentrations, such as Tract 21 (50.6% minority) and 25.01 (67.6% minority) and 25.04 (50.1% minority) have high median incomes of 61,000; 49,000; and 48,000 respectively.

- The chart below shows those Census Tracts with a high percentage of low income population and a high share of minority population.
- Low income families within Fayetteville are located in the following Census Tracts, which are presented with the share of minority population and median income

Census Tract	% Low-Income Pop	Minority % of Pop	Median Income $
2	82.4	82.4	13,000
5	50.54	45.89	30,116
10	80.58	90.9	25,000
11	54.4	84.3	28,735
12	65.1	79.2	23,000
14	51.34	58.2	21,875
22	55.2	73.3	28,000
24.01	75.99	86.4	25,000
38	68.05	84.7	18,000

Utilizing the HUD definition of a Minority Neighborhood (In the case of a metropolitan area, the neighborhood's total percentage of minority persons exceeds 50 percent of its population). The chart on the next page shows those tracts meeting the HUD definition of a minority neighborhood, along with information regarding median incomes. Please note: with the 2010 redrawing of Census districts and the subsequent annexation of portions of Cumberland County, many of these districts fall within both the City and the County's jurisdiction.

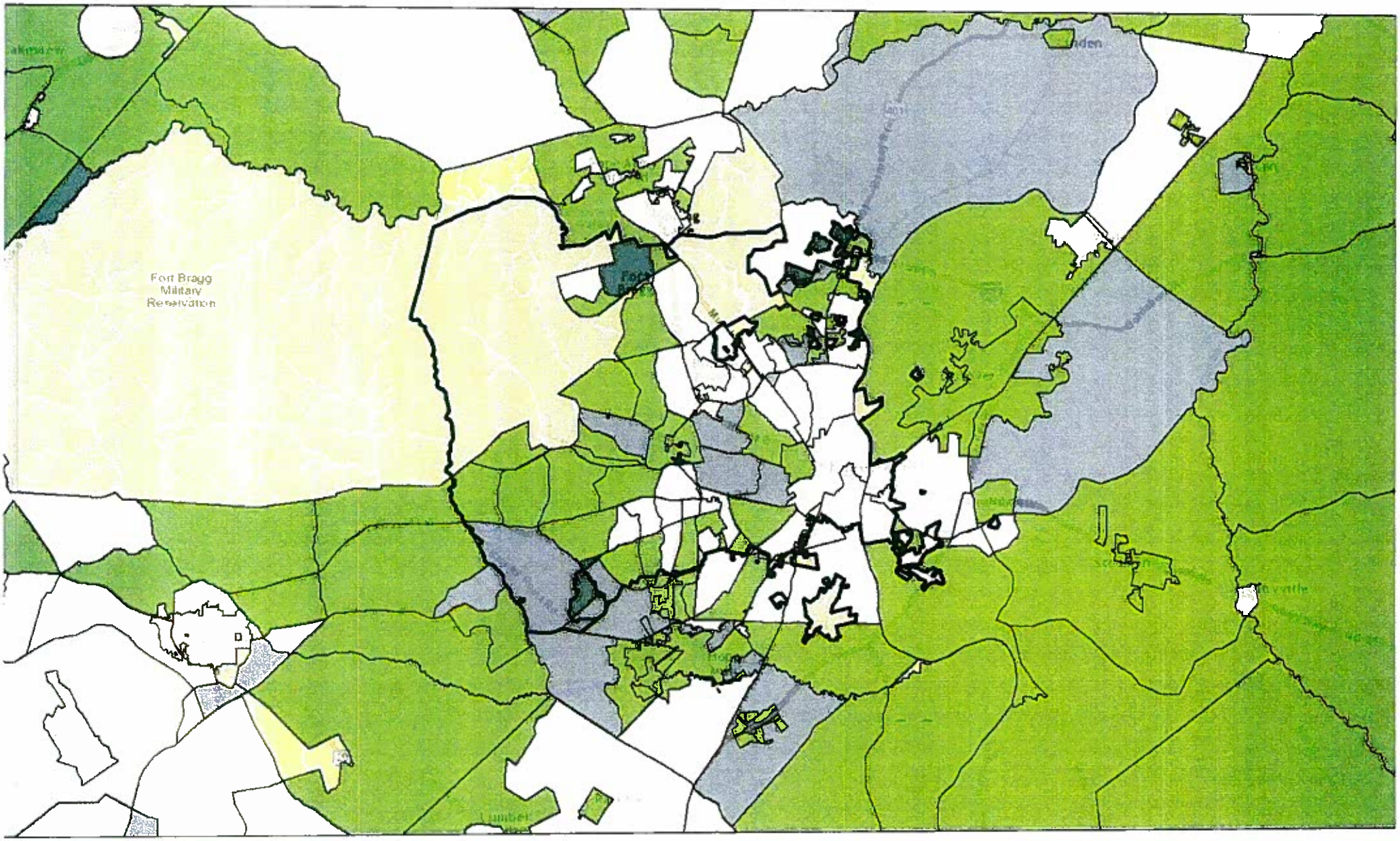
City of Fayetteville/ Cumberland County				City of Fayetteville/Cumberland County		
Census Tract	Minority % of Pop	Median Income $		Census Tract	Minority % of Pop	Median Income $
2	82.4	13,000		**33.04**	64.7	55,000
10	90.9	25,000		**33.05**	66.1	50,000
12	79.2	23,000		**33.07**	73.3	45,000
16.04	58	35,000		**33.09**	54.4	62,000
21	50.6	61,000		**33.10**	68.3	49,000
22	73.3	28,000		**33.11**	60.7	47,000
23	69.7	31,000		**33.12**	65.9	60,000
24.01	86.4	25,000		**33.13**	75.2	57,000
24.02	79.5	36,000		**33.14**	71	51,000
25.01	67.6	49,000		**35**	72.4	32,000
25.04	50.1	48,000		**36**	61	33,000
32.03	64.9	42,000		**38**	84.7	18,000
33.02	77.5	39,000				

The maps on the next few pages show the median household income and poverty rates throughout the City and County.

CONCLUSIONS

While several communities with high levels of minority concentration have high median incomes, some of the Census Tracts with the highest levels of minority concentration also have some of the lowest median income levels for the region.

CPD Maps - Median Household Income



ebruary 24, 2015

Override 1 **MedianHouseholdIncome**

B19013EST1

- <$38,459
- $38,459-$61,745
- $61,745-$93,641
- $93,641-$154,474

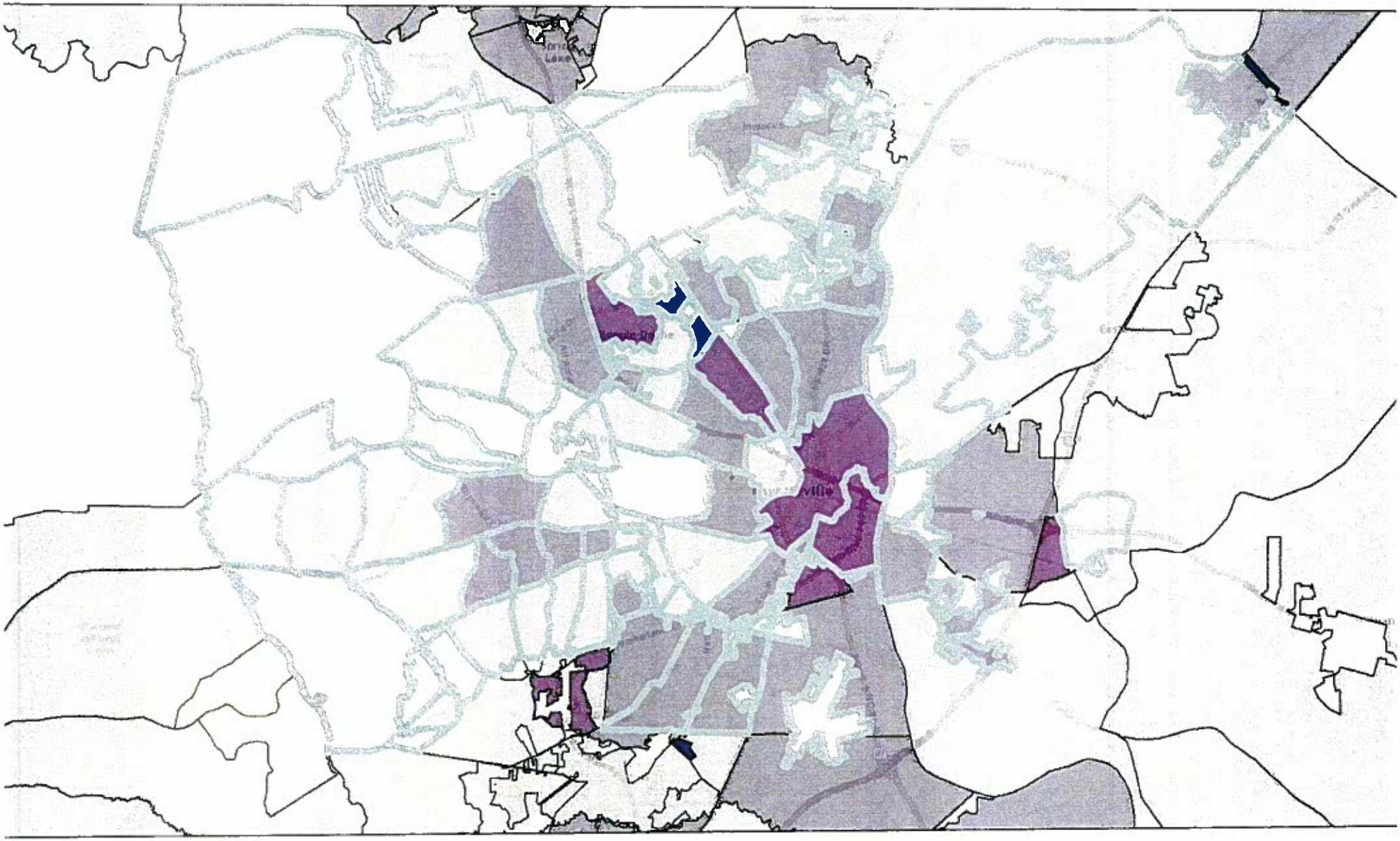
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Poverty Rate By Census Tract - Fayetteville



ebruary 24, 2015

Override 1 **PovertyRate**

Override 1 **B17021EST2_PCT**

- <6.96% Poverty
- 6.96-19.04% Poverty
- 19.04-35.95% Poverty
- 35.95-64.47% Poverty
- >64.47% Poverty

1:196,212

0 1.5 3 6 mi

0 2.5 5 10 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

C. Employment Data

In 2011, the unemployment rate for the county stood at 10.11%; by December, 2014, it had fallen to 6.1%. Through the annexation of part of Fort Bragg, which brought over 40,000 citizens inside City boundaries, Fayetteville has crossed the 200,000 population threshold, making it a more attractive location for potential employers seeking a deep talent pool. The City of Fayetteville has recently established an office of Economic and Business Development, which will centralize business recruiting and incentive efforts among 3-4 employees.

In addition to the rebounding economy, part of the decline in unemployment can be attributed to the recent establishment of several businesses employing several hundred people. As the population ages, the hospital/medical services sector continues to grow. Over the last four years, four call centers offering over 2,000 jobs have located in the county, including one with Blue Cross Blue Shield of North Carolina. A February, 2015 search showed 153 listings for call center jobs in the Fayetteville area. In late February, 2015, Butterball announced that it will be hiring 367 people in Raeford, NC, just across the county line.

Top Employers

According to the North Carolina Commerce Department, in 2014, the top employers in the County and City were the US Department of Defense, the County Board of Education, Cape Fear Valley Health Care Systems, Wal-Mart Associates Inc, the County of Cumberland, Goodyear Tire and Rubber, the City of Fayetteville, Fayetteville Technical Community College, and the Veterans Administration, all employing over 1,000 people. The chart includes a column signifying those employers based in the City of Fayetteville.

Cumberland County
2014 2nd Quarter
Top Employers Ranked

Rank	Organization	Industry	# Employees	Fayetteville-based
1	Department Of Defense	Public Administration	1000+	✓
2	Cumberland County Board of Education	Education & Health Services	1000+	✓
3	Cape Fear Valley Health Systems	Education & Health Services	1000+	✓
4	Wal-Mart Associates Inc	Trade, Transportation & Utilities	1000+	✓
5	County of Cumberland	Public Administration	1000+	✓
6	Goodyear Tire And Rubber Inc	Manufacturing	1000+	✓
7	City Of Fayetteville	Public Administration	1000+	✓
8	Fayetteville Technical Com College	Education & Health Services	1000+	✓
9	Veteran's Administration	Public Administration	1000+	✓
10	Food Lion	Trade, Transportation & Utilities	500-999	

11	Nonappropriated Fund Activity	Army Leisure & Hospitality	500-999	
12	Fayetteville State University	Education & Health Services	500-999	✓
13	Army & Air Force Exchange Service	Public Administration	500-999	✓
14	US Postal Service	Trade, Transportation & Utilities	500-999	✓
15	Eaton Corporation	Manufacturing	500-999	✓
16	Purolator Filters Na Llc	Manufacturing	500-999	✓
17	Priva-Trends Of North Carolina	Education & Health Services	500-999	
18	Public Works Commission	Public Administration	500-999	✓
19	Express Temporary Services Inc	Professional & Business Services	500-999	✓
20	Lowes Home Centers Inc	Trade, Transportation & Utilities	250-499	✓
21	Vertex Aerospace Llc	Trade, Transportation & Utilities	250-499	✓
22	Methodist University Branch	Education & Health Services	250-499	✓
23	Worldwide Language Resources Inc	Professional & Business Services	250-499	✓
24	MJ Soffe LLC	Manufacturing	250-499	✓
25	McDonald's Restaurants of NC Inc	Leisure & Hospitality	250-499	

According to Fayetteville 2012 Comprehensive Annual Financial Report, the top employers in the city are:

#	Employer	# of Employees
1	Department of Defense (Fort Bragg)	15,500+
2	Cumberland County Public School System	6,000+
3	Cape Fear Valley Health System	5,000+
4	Wal-Mart	3,570
5	Good Year Tire Manufacturing and Plant	2,000+
6	Cumberland County	2,000+
7	City of Fayetteville	1,000+

LABOR FORCE[6]

The Bureau of Labor Statistics data for the Fayetteville metropolitan area shows an improving unemployment rate, down nearly 2 percentage points from July-December, 2014.

Fayetteville Metropolitan Area

Labor Force

	July	Aug	Sept	Oct	Nov	Dec
	2014	2014	2014	2014	2014	2014 (projected)
Civilian Labor Force (000s)	161.6	159.6	159.9	160.7	159.4	158.1
Employment (000s)	148.5	146.5	148.6	150.3	149.4	148.5
Unemployment (000s)	13.1	13	11.4	10.4	10	9.6
Unemployment Rate %	8.1	8.2	7.1	6.5	6.2	6.1

The BLS review of data by particular industry shows that the Leisure and Hospitality and Education and Health Services sectors offered the greatest job growth in the last half of 2014.

Fayetteville Metropolitan Area

Labor Force

By Industry

	July	Aug	Sept	Oct	Nov	Dec
	2014	2014	2014	2014	2014	2014 (projected)
Total Nonfarm (3)	127.7	129.7	131.1	132	133	133.6
12-month % change	-0.1	0.5	0.5	0.1	0.1	0.2
Mining, Logging, and Construction (3)	5	5.1	5.1	5.1	5	5
12-month % change	-2	2	2	2	0	2
Manufacturing (3)	11.5	11.4	11.4	11.3	11.3	11.3
12-month % change	-4.2	0.9	0.9	-0.9	0	-0.9
Trade, Transportation, and Utilities (3)	23.5	23.2	23.2	23.2	24	24.3

[6] http://www.bls.gov/eag/eag.nc_fayetteville_msa.htm

12-month % change	1.3	-0.4	0.4	0	-0.4	-1.2
Information (3)	1.5	1.5	1.5	1.5	1.5	1.5
12-month % change	-6.3	-6.3	0	0	0	0
Financial Activities (3)	3.7	3.7	3.7	3.7	3.7	3.7
12-month % change	0	0	-2.6	0	0	0
Professional and Business Services (3)	12.7	12.8	12.8	12.8	12.8	12.9
12-month % change	-0.8	0	-0.8	-0.8	0	0
Education and Health Services (3)	14.2	14.4	14.5	14.7	14.7	14.6
12-month % change	3.6	3.6	4.3	1.4	1.4	0
Leisure and Hospitality (3)	15.6	15.7	15.2	15.1	15.2	15.2
12-month % change	3.3	4	2.7	1.3	1.3	2
Other Services (3)	5	5.2	4.8	4.9	5	5
12-month % change	2	4	-2	0	0	0
Government (3)	35	36.7	38.9	39.7	39.8	40.1
12-month % change	-2	-1.6	-1	-0.5	-0.5	0.8

Footnotes
(1) Number of persons, in thousands, not seasonally adjusted.
(2) In percent, not seasonally adjusted.
(3) Number of jobs, in thousands, not seasonally adjusted. See About the data.
(P) Preliminary

The Bureau of Labor Statistics reports the following 2013 wages for the Fayetteville metropolitan area:[7]

Occupation	Employment	Employment per 1,000 jobs	Median hourly wage	Mean hourly wage	Annual mean wage
All Occupations	125,760	1000	$14.90	$19.30	$40,150

[7] http://www.bls.gov/oes/current/oes_22180.htm

CONCLUSIONS

- Unemployment rates are falling through the region, most recently from 8.1% in July 2014 to 6.1% in December, 2014.
- The Leisure and Hospitality and Education and Health Services sectors offered the greatest job growth in the last half of 2014.

WORKFORCE EDUCATIONAL & SKILL PROFILE

Based on ACS 2007-11 data, it appears that younger cohorts recognize the increasing value of a higher education. Reviewing educational attainment by age, residents 65+ appear to have the highest share of population without a high school diploma (22%). Younger cohorts have more education, with nearly 39% of 35-44 and 45-65 year olds having an associates, bachelors, or graduate degree.

The presence of the large military and retired military population offers opportunities for utilization of the unique set of leadership, technical skills, and soft skills obtained within the military.

Cumberland County is the fifth largest school district in North Carolina, with over 53,000 students from 43 countries and speaking 83 different native languages. The school received a 2013 Broad Prize for one of the country's most improved public school districts.

The county is also home to Fayetteville State University, Fayetteville Technical Community College, and Methodist University. Additionally, the following universities also offer courses and degrees at Fort Bragg and/or Pope Air Force Base: Campbell University, Excelsior College, Webster University UNC-Pembroke, and Embry-Riddle Aeronautical University.

The region's high school graduation rates are similar to those of the state as a whole (81.7% in Cumberland County vs. 82.5% for state). Nonetheless, it is projected that 2/3 of all new jobs in 2020 will require training or education beyond high school, leading to a national shortage of 5 million workers (Georgetown Center on Education and the Workforce.) This development presents an opportunity to further train the City and County's residents.

It appears that the region has some opportunity to further match educational attainment levels to the jobs available within the county. During the 2007-11 period, despite what is widely considered to be a time of economic downturn, several sectors showed a shortage of workers, particularly in Education and Health Services; Professional, Scientific, Management Services, and Finance, Insurance and Real Estate, generally require college and post-graduate education.

The greatest share of the current Fayetteville workforce (32.8%) has some college, but no degree; followed by 28.1% with a High School degree or GED equivalent/alternative. Slightly over 20% have a bachelors degree or graduate degree, 9.2% have an associates degree, and 9.7% have less than a high school degree. The share of the County (outside Fayetteville)'s workforce with a college degree or higher is 17%, which suggests a potential reason for these employment shortages. By contrast, 29.2% of the US 18+ population nationally has a college degree or higher (2014 Census).

Discussions with Cumberland County Workforce Development experts suggest that employers continue to seek employees with technical skills. To complement technical skills, employers are more interested in "soft skills" – employees dressing appropriately, arriving on time, working in teams, and taking instruction.

Businesses also report to the Workforce Development team that employers have needs for very specific higher technical skills, such as for welders or machinists.

Some challenges lie in finding paths for people released from prison to find employment. One of the agencies interviewed, for example, has had a plumber job paying $16/hour available for several months, but has had few applicants, and unfortunately, those applicants were disqualified for DUI or criminal histories. The office employs a former offender who supports other former offenders in finding work.

CONCLUSIONS

- Employers seek more employees in specific higher tech skills, such as welders or machinists, and are also interested in those soft skills – such as dressing appropriately, arriving on time, working in teams, and taking instruction – that military personnel often excel in.
- The region's share of college graduates lags that of the US overall, but the region has a rich resource of technical and soft skills through the workers at Fort Bragg and Pope Air Force Base.
- The area has an opportunity to strengthen its share of college graduates and technical workers to meet the job opportunities of the future.

D. Housing Profile

The region faces a shortage of affordable, accessible housing. Many factors may play into the stability of housing within the City of Fayetteville and Cumberland County. The region's home to an extensive military community represents a level of mobility that is reflected within some housing indicators. For example, home ownership rates are over 10% lower than those of the rest of the state.

Additionally, the high rates of mobility are captured in the share of residents living in the same house for more than one year, which, at 75.2%, lags state rates by nearly 10%. Clearly, as military families transfer in and out of the region, this will be reflected in the fluidity of housing arrangements.

Housing costs are also significantly higher in Cumberland County than in the state overall. A smaller share of the owner or renter population pays lower housing payments than other NC residents.

Other socioeconomic indicators important to understanding the county include the high rate of homes that do not have a motor vehicle; while slightly lower than the state average (6.3% vs. 6.5%), this is still a significant share of homes for a 658 square mile county (22nd largest county in the state.)[8]

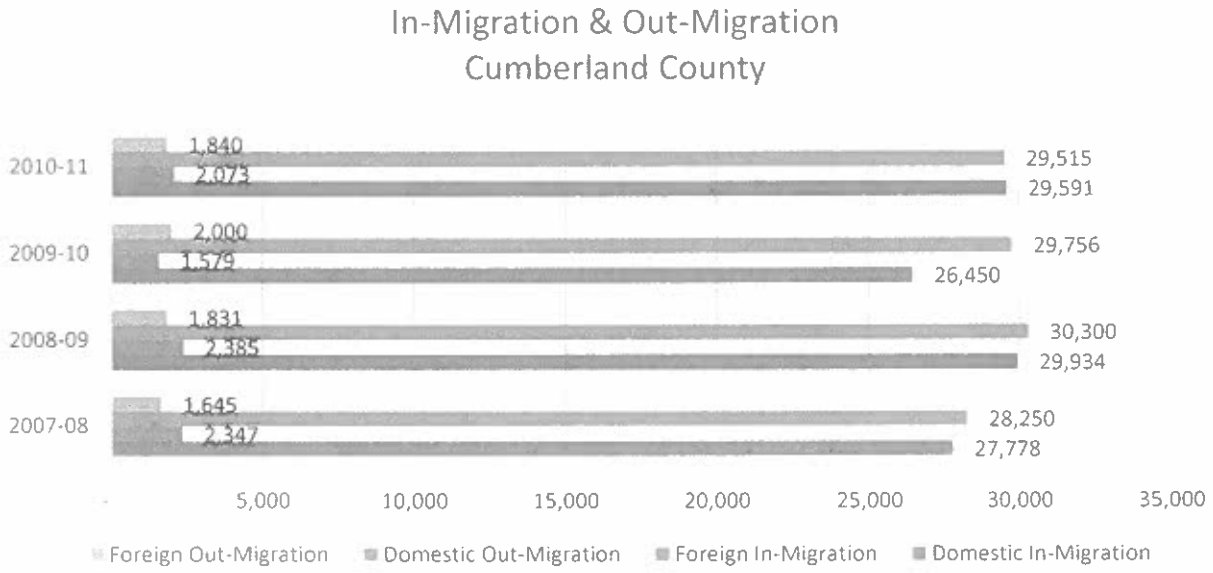
[8] Preceding analysis from **Analysis and Needs Assessment, Cumberland County Continuum of Care on Homelessness,** Karen Dash Consulting, LLC, November 2014

Of the 142,353 housing units within the county, 22.2% are multi-family houses (vs. 17.2% for the state).[9] As the region transitions from a formerly rural, agricultural economy to an urban and suburban economy, the county faces challenges regarding buildable land and housing its growing population.

Effects of Military Population on Housing Market

The 39,457 people associated with the Fort Bragg military installation create unique features of the housing market. The military population is very dynamic and fluid, contributing to the approximately 30,000 people moving into and an additional 30,000 people moving out of the County every year. Each in-migration and out-migration represents approximately 10% of the county's population. Within those totals are approximately 2,000 foreign people moving into Cumberland and 2,000 other foreign people moving out of the county each year.

By contrast, Forsyth County, North Carolina, with approximately 358,000 residents, sees about 13,500 residents moving into and approximately the same number moving out of the county each year, with fewer than 100 foreign-born people moving into or out of the county. The chart below give a sense of the fluidity of the Cumberland County population from 2008-2011, based on county-level tax return data from the Internal Revenue Service.



This type of churning within the region's real estate market creates higher prices for all housing stock; additionally, it focuses market forces on serving those active segments of the market catering to military families. Some landlords or developers in local housing markets serving military populations tend to price their housing to coincide with the military's basic allowance for housing (BAH). For 2015, the BAH for Fort Bragg and Pope Air Force Base ranges from $1,161 to $1,947 monthly for a family with

[9] http://quickfacts.census.gov/qfd/states/37/37051.html

dependents (based on rank).[10] As a result, housing costs for the rest of the City remain relatively inflated.

Absorption Rates

The Fayetteville Regional Association of Realtors provided the following information regarding absorption rates in the metropolitan area, which are the **rate** at which available homes are sold in the Fayetteville real estate market during 2014. It is calculated by dividing the total number of available homes by the average number of sales per month.

In 2014, of the 847 new home listings, no new homes were constructed in the $<99,999 price range, according to the Fayetteville Regional Association of Realtors.

As a result, the smallest available supply of existing homes is in the $<74,999 market (4.98 months). Of 4,431 closings of existing homes in 2014, 1,300 (29%) were in the $<74,999 category. The next highest number of closings of existing homes, 554 in the $100-124,999 range, is less than half.

The significance of absorption rates and months supply of homes lies in the supply's effect on housing prices. Generally speaking, 5-6 months of supply are indicative of a normal, stable market. With only 3-4 months supply, prices experience single digit appreciation, and at 1-2 months, prices can rise by double digit appreciation. At the other end of the market, at 7-8 months, house prices experience single digit depreciation, and at 9-10 months or more experience double-digit depreciation. Utilizing this yardstick, prices for existing homes in the $<74,999 price range are experiencing single digit appreciation.

Absorption Rates for New Construction, 2014
Fayetteville Regional Association of Realtors
January 1, 2014 – December 31, 2014

Price Range	# Active Listings	# Closed in Last 12 Months	Available # Months Supply
<$74,999	0	0	0
$75,000-$99,999	0	0	0
$100,000-$124,999	6	7	10.29
$125,000-$149,999	27	85	3.81
$150,000-$174,999	122	237	6.18
$175,000-$199,999	148	290	6.12
$200,000-$224,999	135	253	6.4
$225,000-$249,999	137	287	5.73
$250,000-$299,999	155	301	6.18
$300,000-$349,999	48	56	10.29
$350,000-$399,999	41	21	23.43
$400,000-$499,999	19	20	11.4

[10] http://www.military.com/Resources/2015-with-dependents-bah-rates.pdf

$500,000-$749,999	7	4	21
$750,000-$999,999	2	3	8
$1,000,000 and up 0 1 0.08 0.00	0	1	0
Totals	847	1565	6.49

Absorption Rates for Existing Homes, 2014
Fayetteville Regional Association of Realtors
January 1, 2014 – December 31, 2014

Price Range	# Active Listings	# Closed in Last 12 Months	Available # Months Supply
<$74,999	540	1300	4.98
$75,000-$99,999	490	525	11.20
$100,000-$124,999	411	554	8.9
$125,000-$149,999	405	540	9.00
$150,000-$174,999	388	475	9.8
$175,000-$199,999	308	303	12.20
$200,000-$224,999	159	207	9.22
$225,000-$249,999	166	153	13.02
$250,000-$299,999	197	186	12.71
$300,000-$349,999	106	67	18.99
$350,000-$399,999	74	51	17.41
$400,000-$499,999	70	44	19.09
$500,000-$749,999	50	22	27.27
$750,000-$999,999	10	0	NA
$1,000,000 and up	12	4	36.00
Totals	3386	4431	9.17

Based on 2007-2011 housing data, 54,235, or 63% of homes in the City of Fayetteville are single-family detached houses, with 5% containing 20 or more units. Among owner-occupied housing, 90% features 3 or more bedrooms, while less than half that percentage of renter-occupied housing features 3 bedrooms or more.

As stated above, the strong military presence affects the rental market as well.

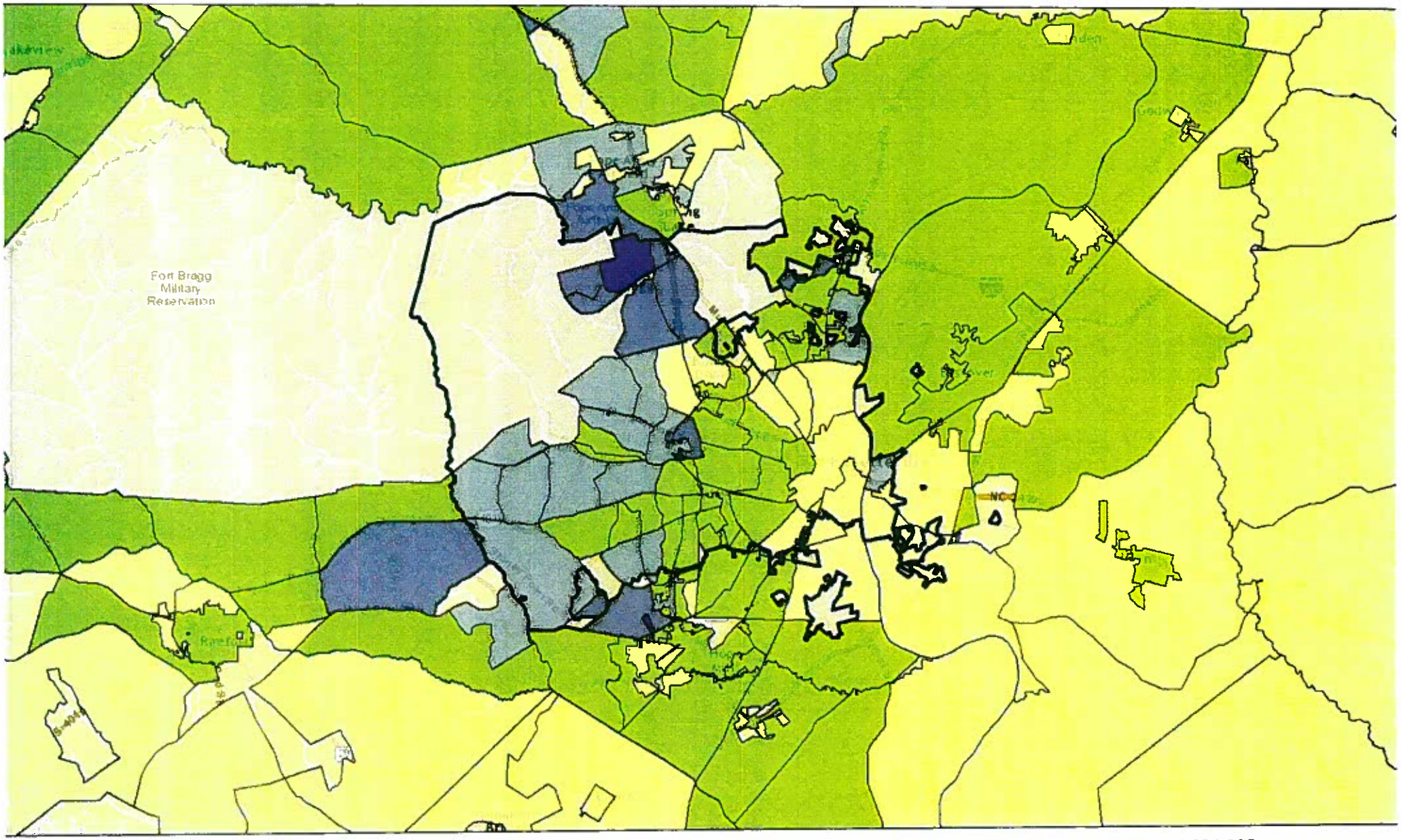
According to the National Low Income Housing Coalition's 2013 Out of Reach Report,[11] a Fayetteville worker would need to earn the following hourly wage to afford housing at the HUD Fair Market Rent.

Category	0 Bedroom at FMR	1 Bedroom at FMR	2 Bedroom at FMR	3 Bedroom at FMR	4 Bedroom R at FMR
Wage Needed	$11.15	$11.23	$14.37	$19.21	$24.19
% Minimum Wage	154%	155%	198%	265%	334%
% Mean Renter Wage	93%	94%	120%	160%	202%

Within the rental market, as the map on the next page shows, the lowest rents are within the downtown Fayetteville, Massey Hill and Bonnie Doone communities.

[11] http://nlihc.org/oor/2013/NC

CPD Maps - Median Contract Rent



ebruary 24, 2015

Override 1 **MedianContractRent**

B25058EST1

<$454

$454-$702

$702-$1,019

$1,019-$1,498

>$1,498

1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/
Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo
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Housing Condition

Within the City of Fayetteville, fifty three percent of owner-occupied housing and forty four percent of renter-occupied housing was built before 1980, including 6% of each built before 1950. The oldest housing is in the area west of US 401Br and south of NC24W. A lower concentration of housing is in the areas northwest and southeast of Bonnie Doone, and in the area west of Shaw Road.

Compared to the county outside the city limits, the City's housing stock is proportionately older. Outside Fayetteville, 33% of owner-occupied housing and 36% percent of renter-occupied housing was built before 1980, including 3% of owner- and 4% of renter-occupied units built before 1950. Some areas within Falcon, Linden, and Wade have between 52% and 80% of their housing built before 1950. The maps on the next two pages show the distribution of housing by age in the region.

A need clearly exists for the rehabilitation of owner- and renter-occupied housing: in Fayetteville, 30% of owner-occupied and 44% of renter-occupied housing has at least one housing condition. Ninety nine percent of owner-occupied housing has only one condition, whereas 96% of renter-occupied has one condition, 4% has two conditions, and a small number have three conditions.

In the County outside Fayetteville, 25% of owner-occupied and 44% of renter-occupied housing has at least one housing condition. Ninety eight percent of owner-occupied housing has only one condition, whereas 94.6% of renter-occupied has one condition, 4.6% has two conditions, and 0.7% have three conditions.

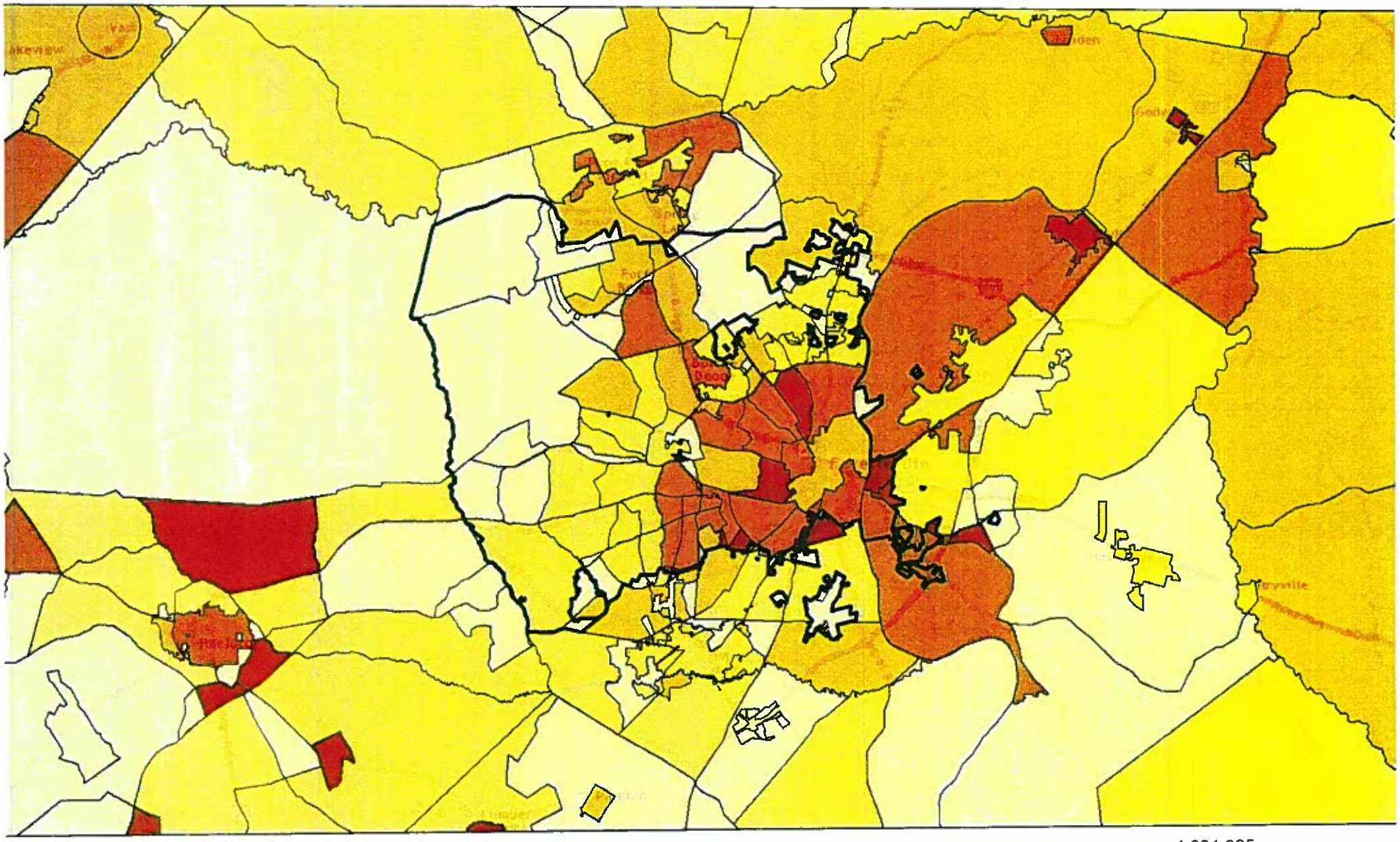
Further, based on their year built, and the assumption that as many as half of all units built before 1980 may contain lead-based paint, up to 27,321 housing units within the City of Fayetteville and up to 13,796 housing units within the county may have lead-based paint.

The charts following the distribution of housing by age give a sense of the distribution of housing problems. The distribution of problems, while relatively widespread throughout the region, tends to be most concentrated within lower-income areas of the city, including Census Tracts 21, 20.04, and, most particularly 7.02.

Following the rent information are maps showing the affordability of housing by income level.

This suggests that additional subsidies to families, especially larger families at the 50% AMI level, would significantly strengthen their ability to afford housing to meet their family's needs, particularly in a market driven by the Ft. Bragg/Pope Air Force BAH.

CPD Maps - Rental Housing Built before 1980



ebruary 24, 2015

Override 1 **RentalHousingBuiltBefore1980**

B25036_RENT_80MINUS_PCT

- <15.6%
- 15.6-42.66%
- 42.66-65.75%
- 65.75-86.85%
- >86.85%

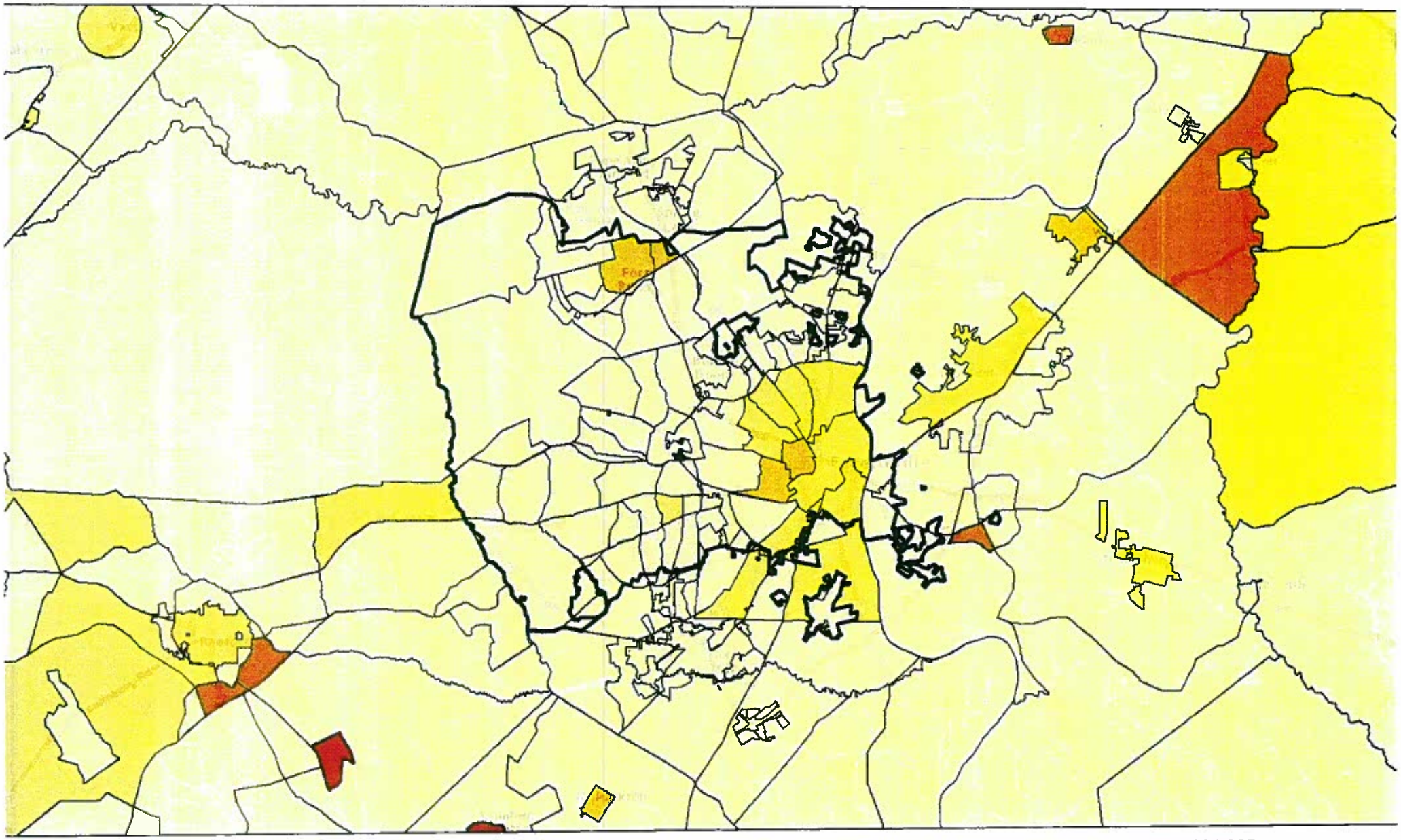
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources. Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Rental Housing Built before 1949



ebruary 24, 2015

Override 1 **RentalHousingBuiltBefore1949**

B25036_RENT_49MINUS_PCT

<9.92%

9.92-29.59%

29.59-52.41%

52.41-80.38%

>80.38%

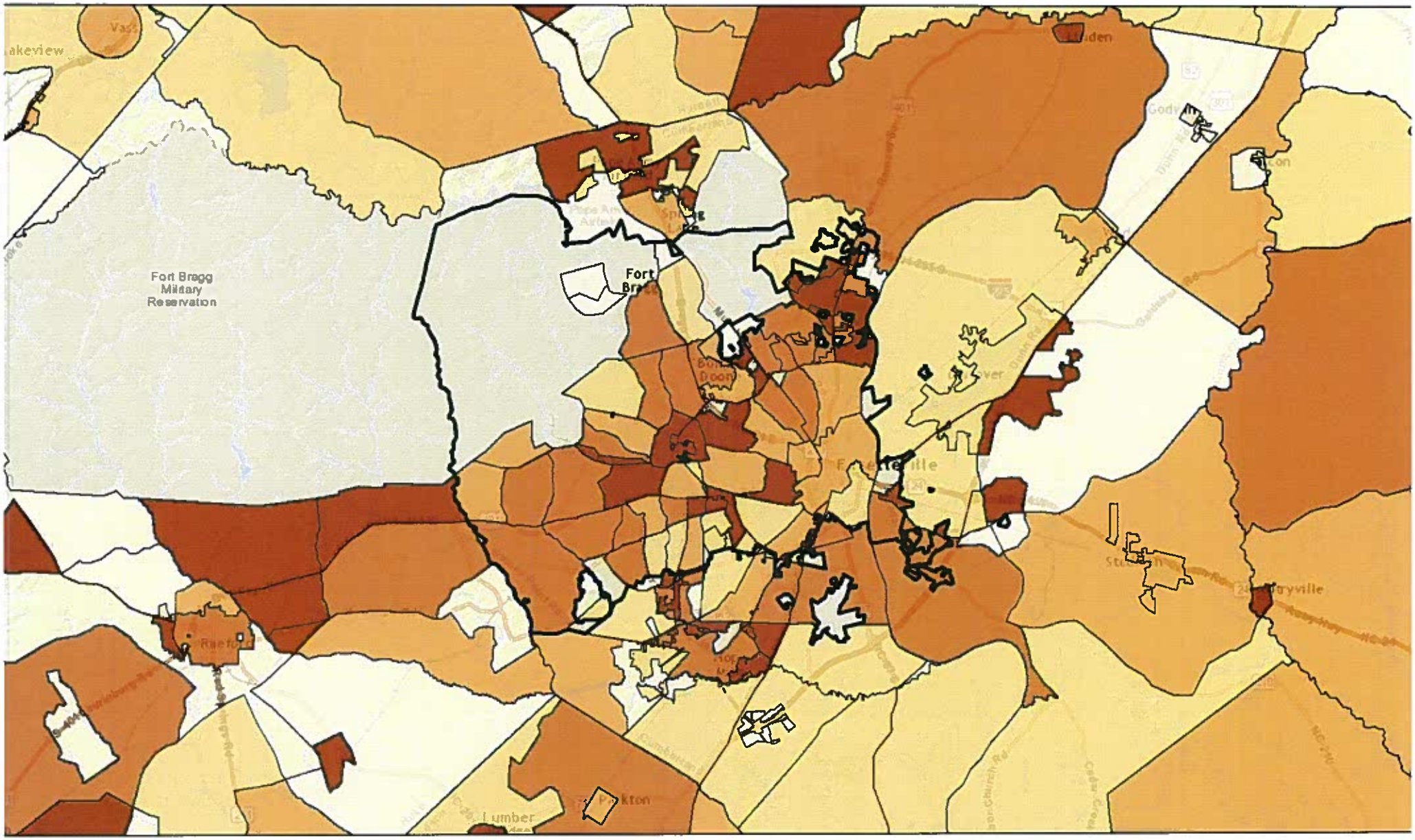
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Extreme Low Income HH with any of 4 Severe Housing Problems



ebruary 24, 2015

Override 1 **ELIHHWithHousingProblems**

T2_LE30_HP2_PCT

- <21.67%
- 21.67-50.59%
- 50.59-70.21%
- 70.21-88.73%
- >88.73%

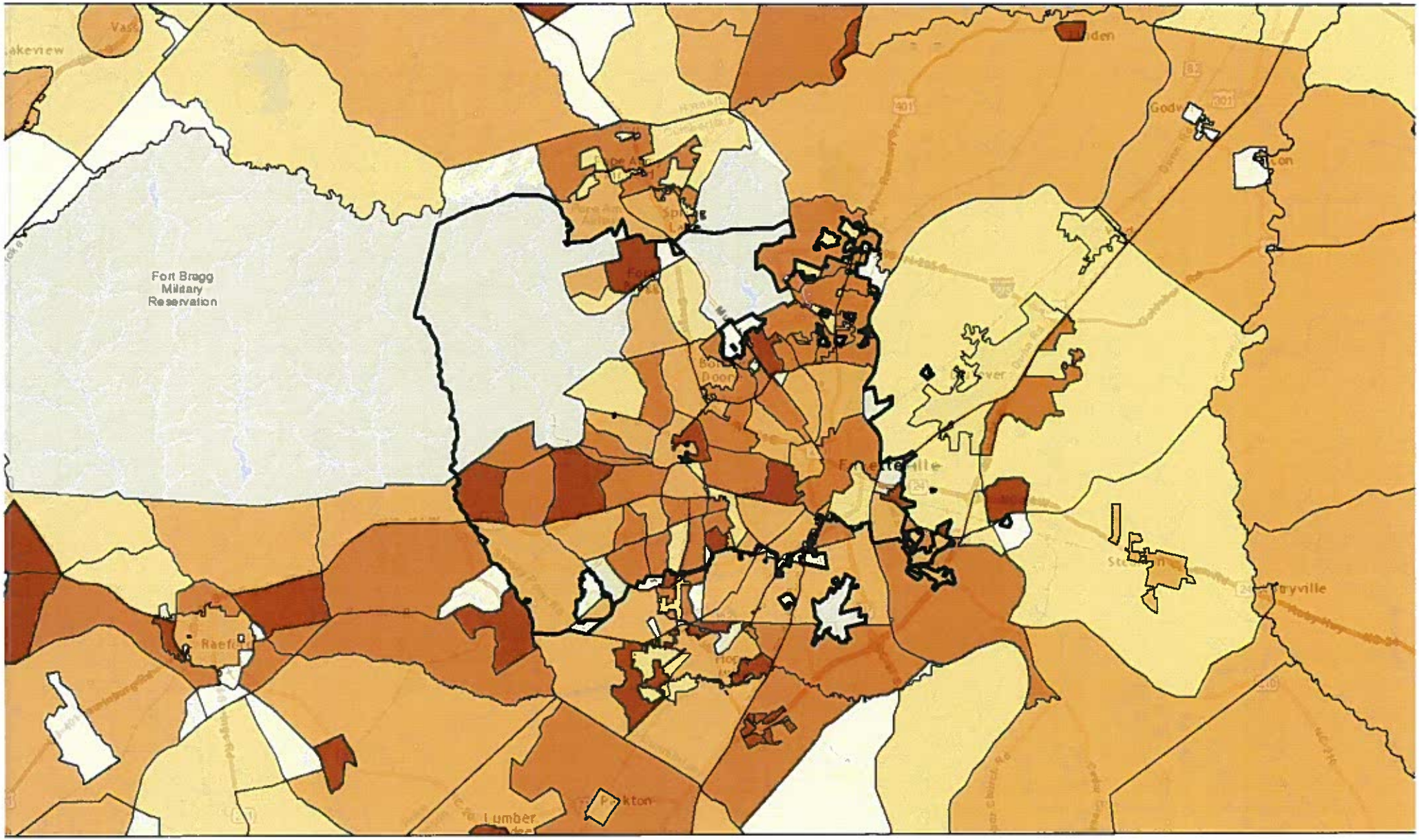
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTc Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Low Income HH with Any of 4 Severe Housing Problems



ebruary 24, 2015

Override 1 **LIHHWithHousingProblems**

T2_LE50_HP2_PCT

- <17.14%
- 17.14-41.05%
- 41.05-60.74%
- 60.74-83.64%
- >83.64%

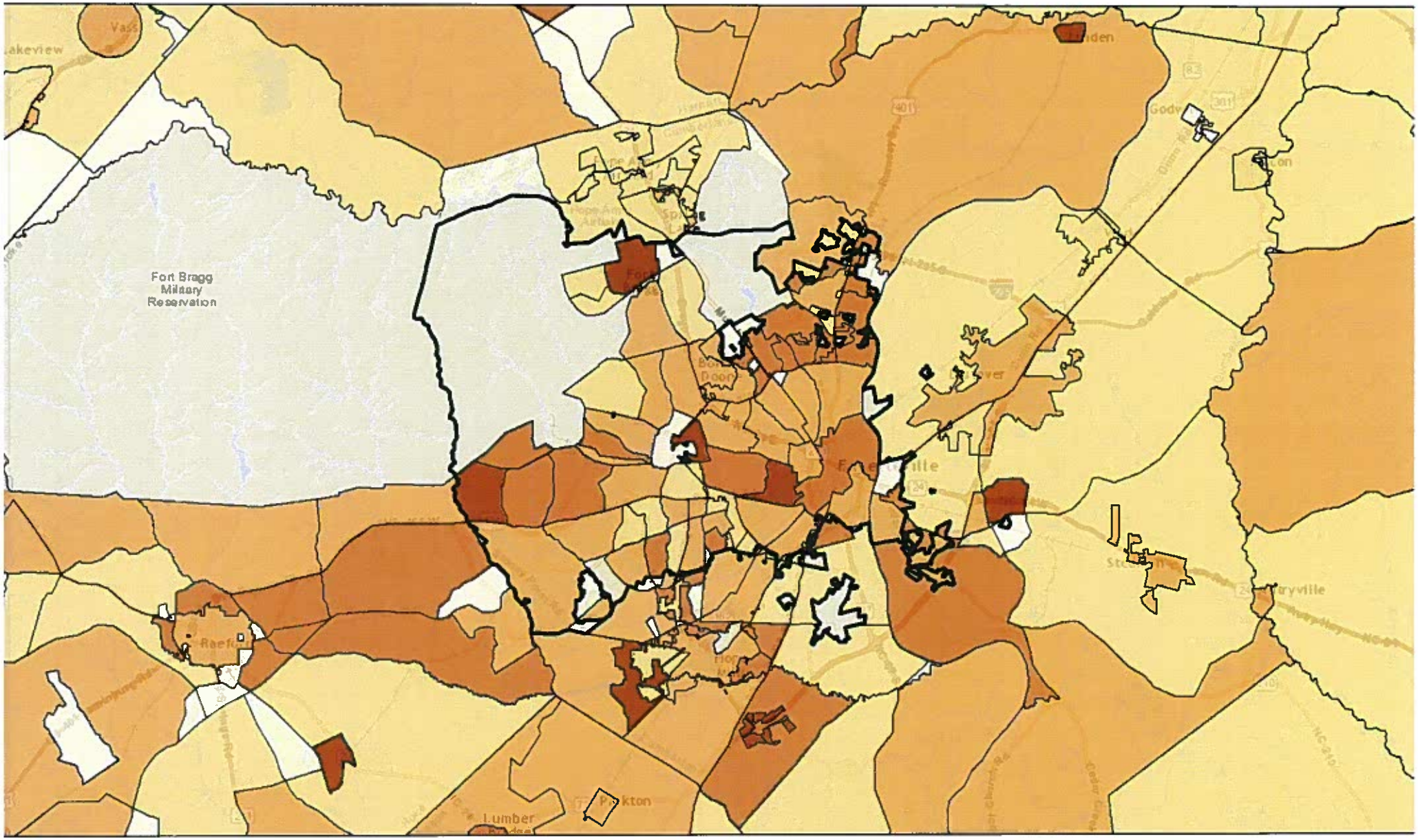
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Moderate Income HH with Any of 4 Severe Housing Problems



ebruary 24, 2015

Override 1 **MIHHWithHousingProblems**

T2_LE80_HP2_PCT

- <13%
- 13-31.65%
- 31.65-49.34%
- 49.34-76.29%
- >76.29%

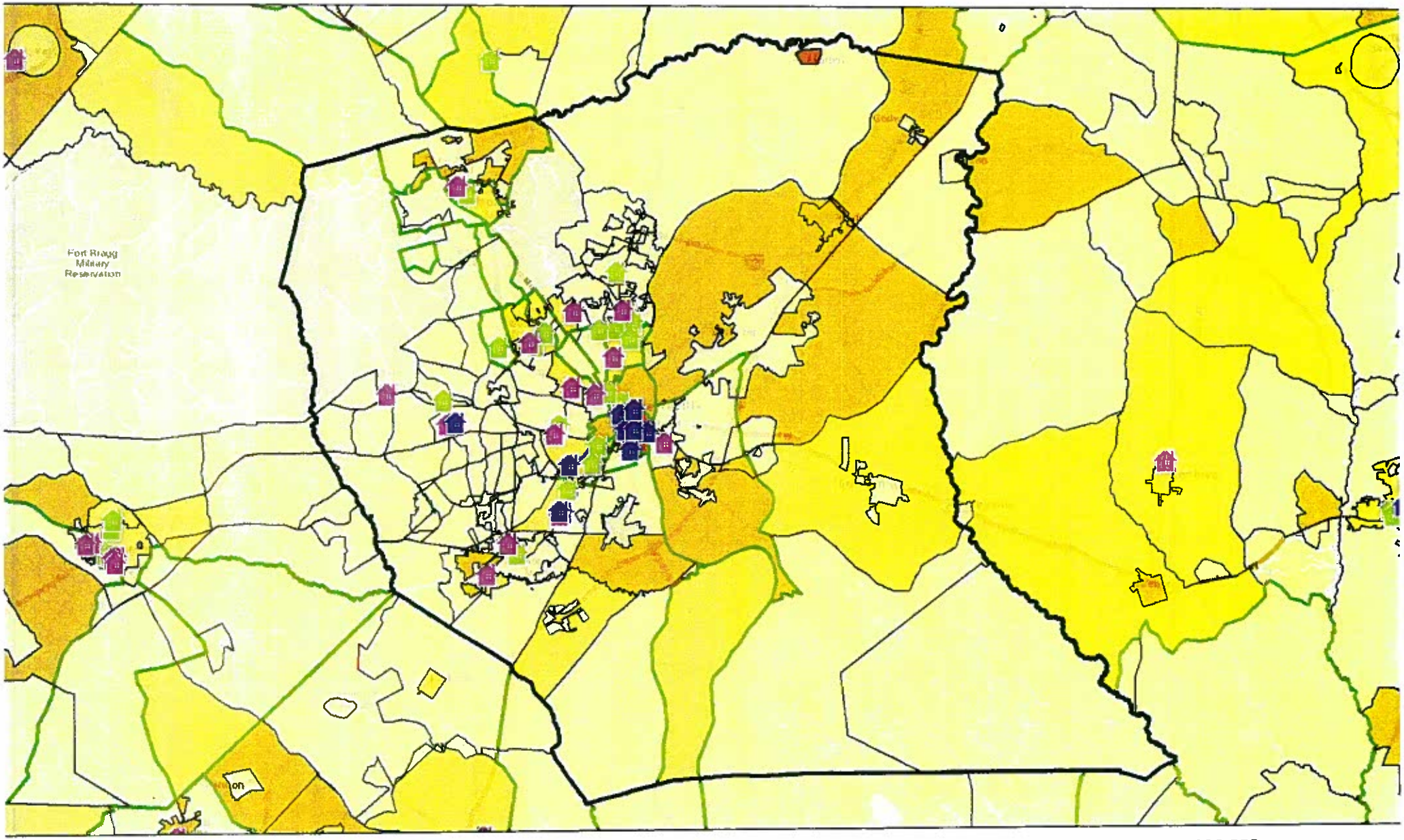
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Renter Units - 30% HAMFI



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted

Override 1

Low Mod Tract

RenterUnitsTo30PercentHAMFI

AFF_AVAIL_30_R_PCT

- <5.59%
- 5.59-17.48%
- 17.48-35.4%
- 35.4-70.91%

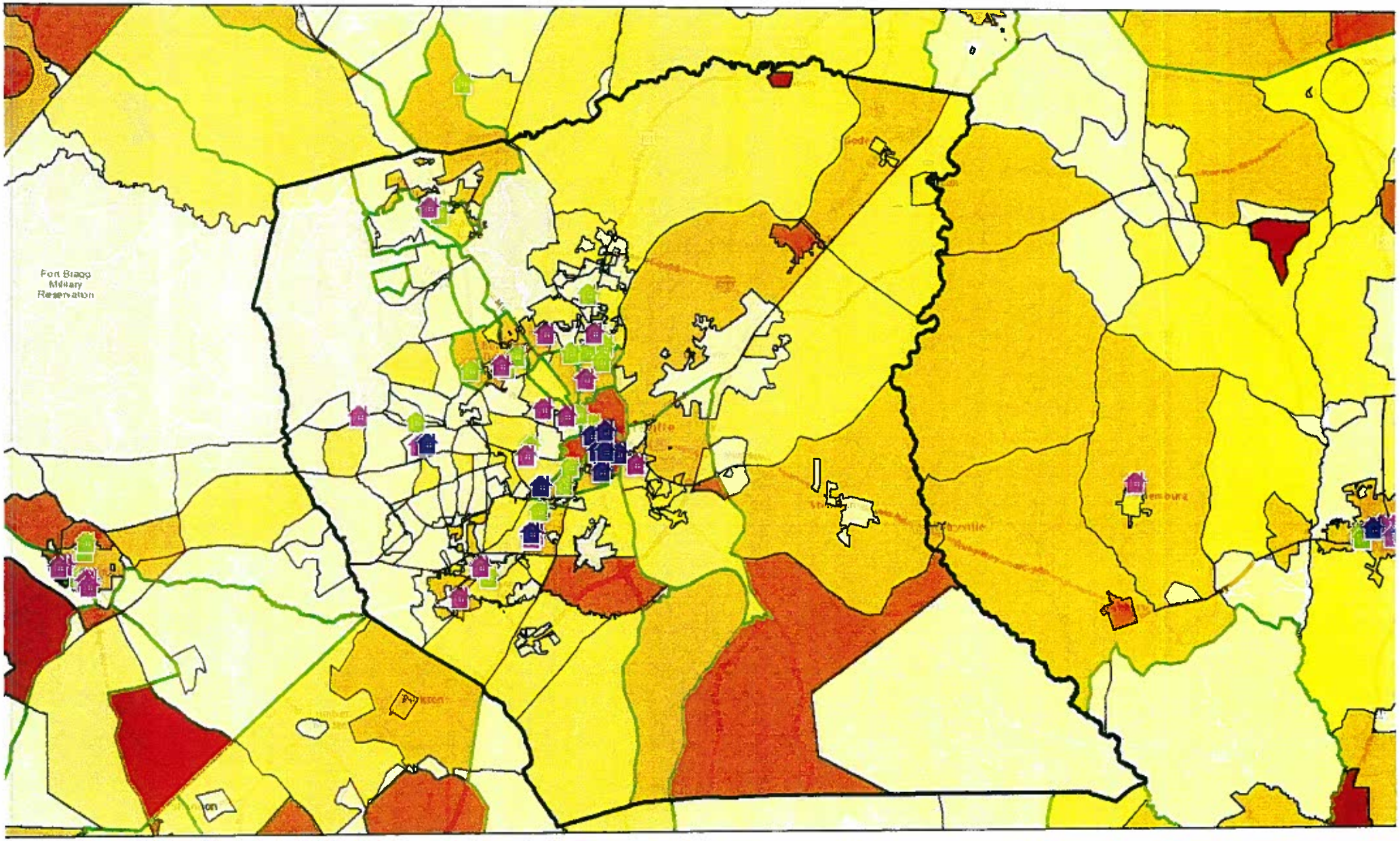
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Renter Units - 50% HAMFI



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted
- Override 1

Low Mod Tract

RenterUnitsTo50PercentHAMFI

AFF_AVAIL_50_R_PCT

- <10.49%
- 10.49-27.93%
- 27.93-47.42%
- 47.42-76.57%
- >76.57%

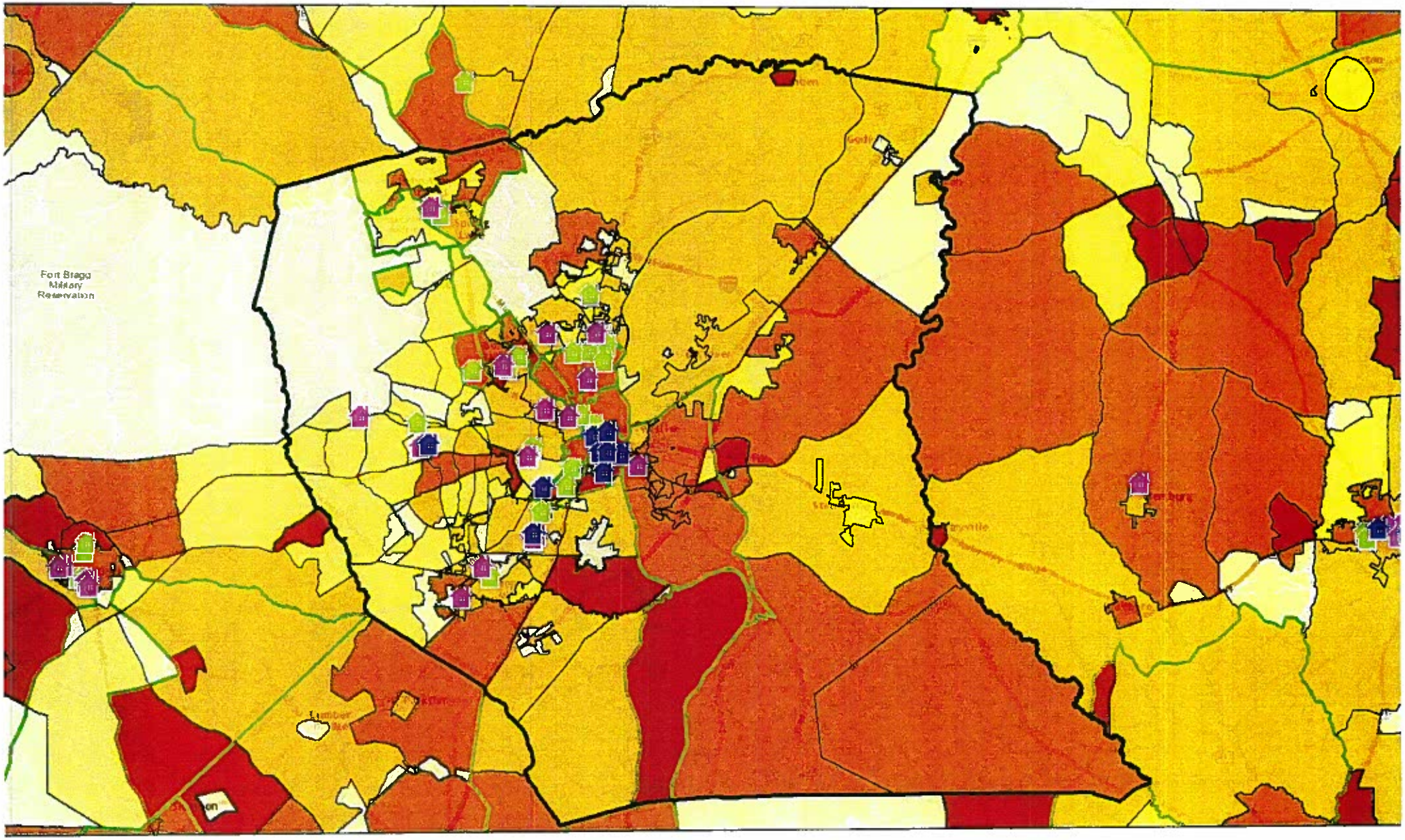
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Renter Units - 80% HAMFI



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted
- Override 1

Low Mod Tract

RenterUnitsTo80PercentHAMFI

AFF_AVAIL_80_R_PCT

- <18.01%
- 18.01-43.3%
- 43.3-64.2%
- 64.2-85.27%
- >85.27%

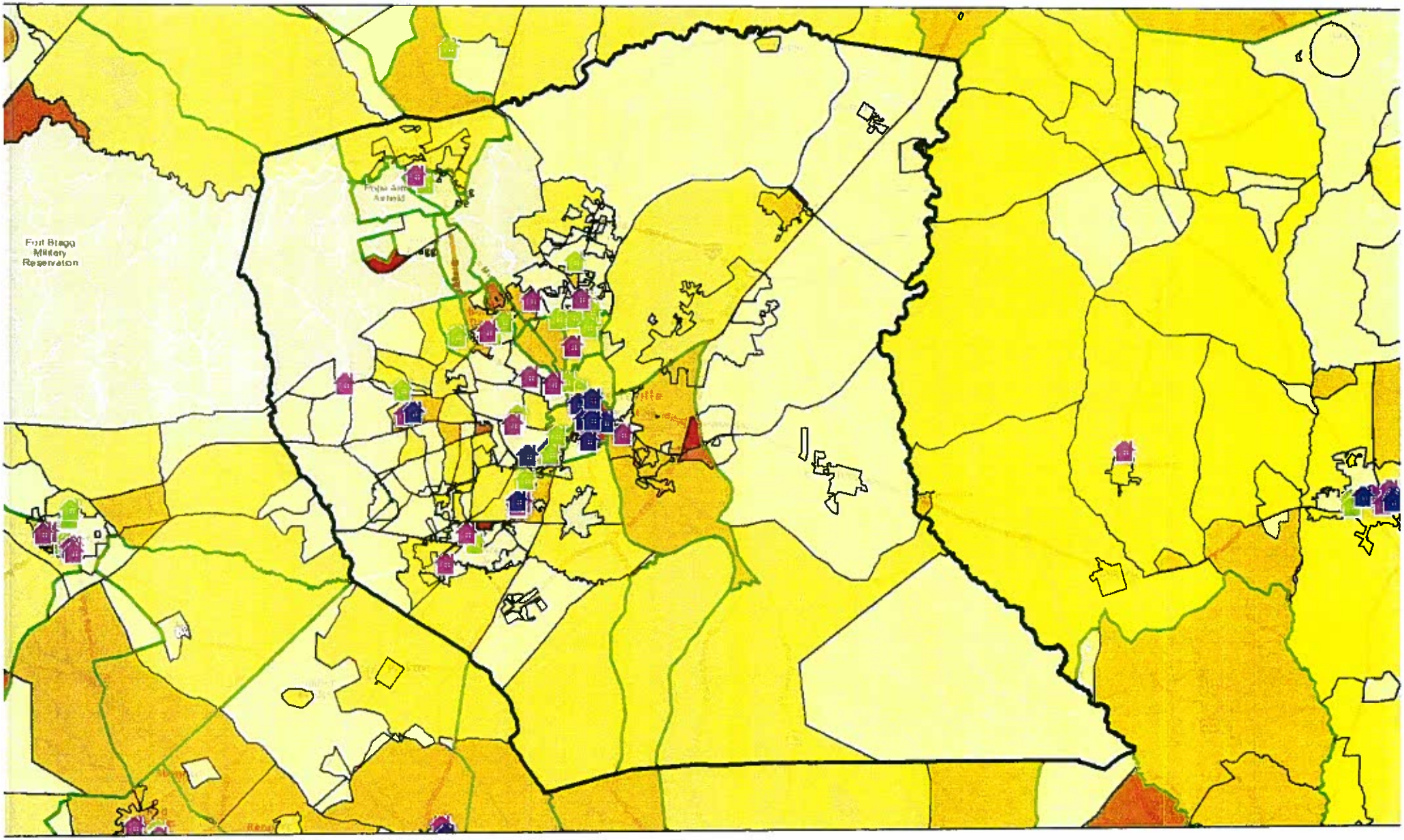
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Owner Units - 50% HAMFI



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted
- Override 1

Low Mod Tract

OwnerUnitsTo50PercentHAMFI

AFF_AVAIL_50_O_PCT

- <6.11%
- 6.11-17.63%
- 17.63-34.74%
- 34.74-68.97%
- >68.97%

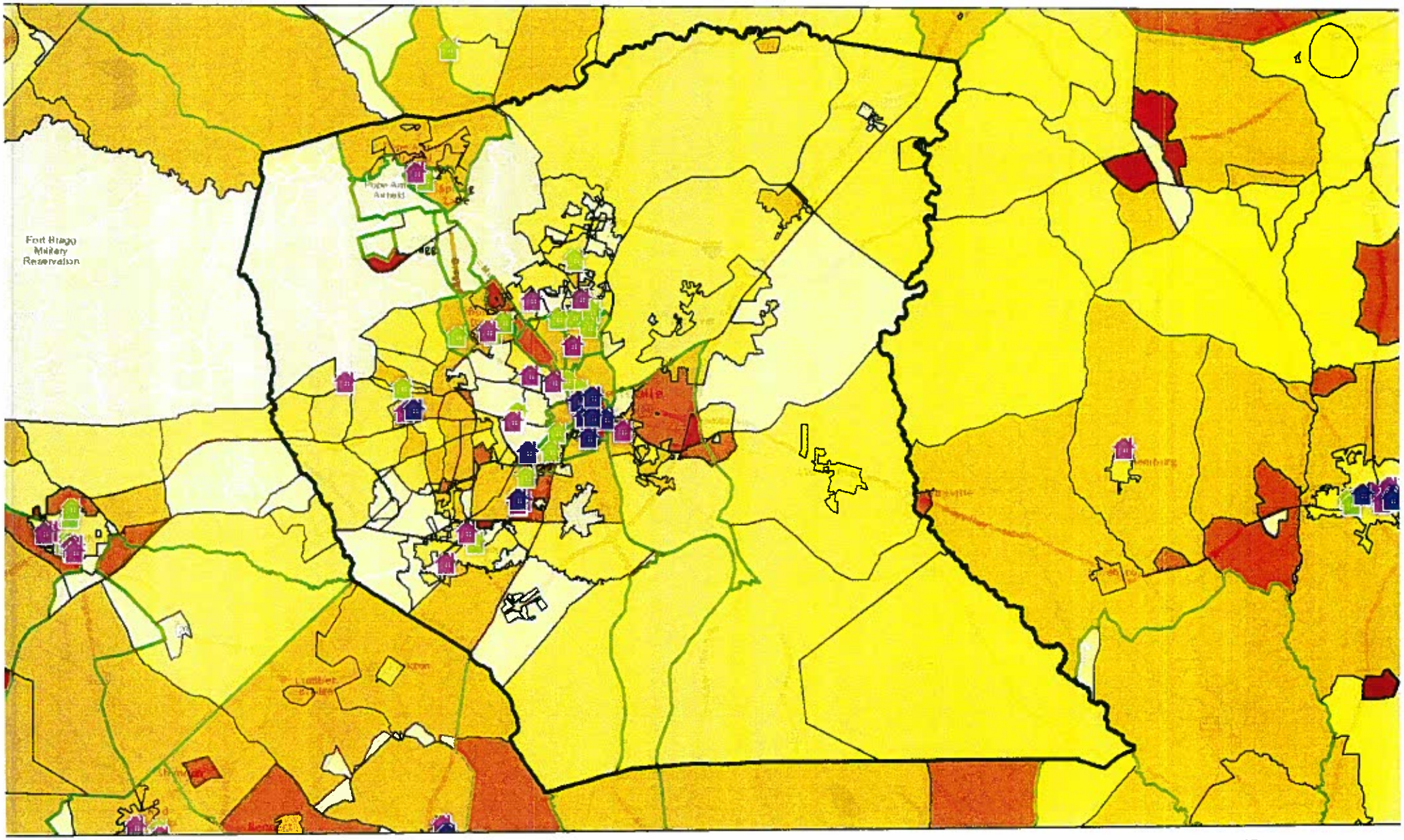
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Owner Units - 80% HAMFI



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted
- Override 1

Low Mod Tract

OwnerUnitsTo80PercentHAMFI

AFF_AVAIL_80_O_PCT

- <10.62%
- 10.62-26.29%
- 26.29-44.3%
- 44.3-73.23%
- >73.23%

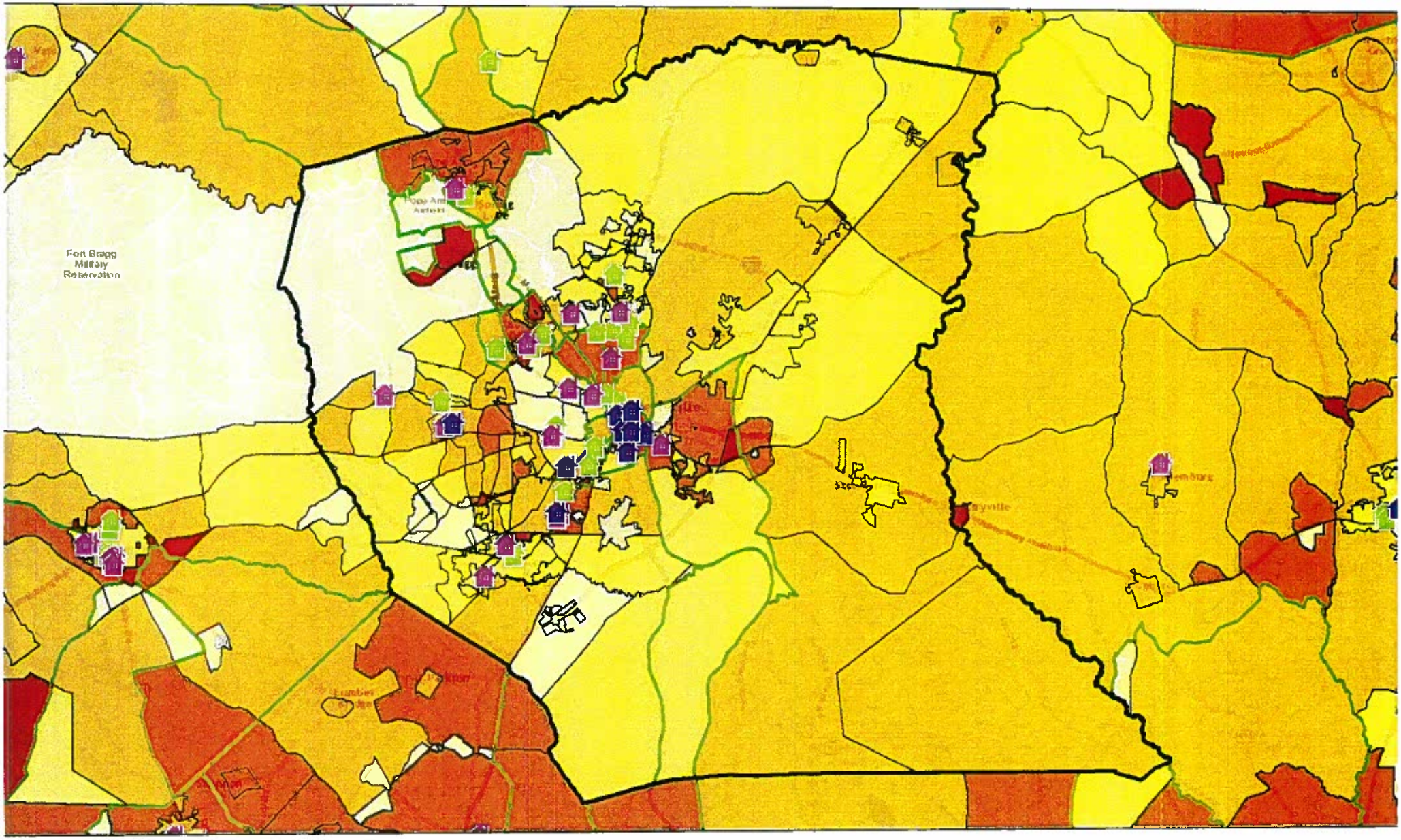
1:396,555

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCA Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Cumberland County - Owner Units - 100% HAMFI



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted
- Override 1

Low Mod Tract

OwnerUnitsTo100PercentHAMFI

AFF_AVAIL_100_O_PCT

- <13.57%
- 13.57-31.47%
- 31.47-49.55%
- 49.55-74.88%
- >74.88%

1:397,838

0 3.25 6.5 13 mi

0 5 10 20 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC
Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo
MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

PUBLIC HOUSING

The Appendix provides information regarding 27 developments offering government-subsidized permanent housing to low-income people, including information on income levels served; the type of clients served; and wait lists.

The analysis identified 4,148 units of affordable housing, of which 869, or 21%, were available to those earning less than the 30% median income established by HUD. Approximately 150 of those units are targeted to people with disabilities.

Another 1,530 units were available to individuals or families within the 40%-60% of median income range, and another 236 were available to individuals, families, or elderly (including elderly with disabilities) people within the 40%-60% of median income range.

Seventy nine units (without income guidelines) are targeted to people with disabilities, including 12 units for homeless people or families with disabilities. Another 104 units (without income guidelines) are targeted to elderly people.

Tenant Selection Procedures: According to the Fayetteville Metropolitan Housing Authority, applicants on the wait list are given no preference in obtaining their housing unit; that is, they are served in the order in which they are in the queue. For example, within the queue for one-bedroom apartments, which makes up over half of the 600-family waiting list, are seniors and students who seek low-cost housing. Although the FMHA regards the senior citizen clients as likely to be in greater need of housing, it cannot "jump" them over the students in that line.

However, the FMHA stated that, for the new Hope VI complex, working applicants and disabled applicants are given preference. However, applicants cannot be asked about their disability status, and so the authority is unclear on how many applicants are disabled.

The most recent data available from the City of Fayetteville indicates that there are currently 121 disabled families residing in public housing and 374 disabled families receiving housing vouchers. Of the families residing in public housing, 784 families have requested handicap accessibility features for the housing units they reside in. One local official felt that the region's housing was "years behind in compliance" with the Americans with Disabilities Act (ADA), due to a lack of knowledge of the rights and requirements of the ADA.

Waiting Lists

Most housing developments serve more than one type of client. The table below shows that waiting lists predominate housing for singles, singles with developmental or physical disabilities, and couples. Twenty of the housing developments have wait lists, ranging from 1-2 weeks to three years.

Housing Wait Lists by Clientele Served

Clientele Served	Complexes without Wait Lists (TOTAL)	Complexes with Wait Lists (TOTAL)	Complexes without Wait Lists Income <30%	Complexes with Wait Lists Income <30%
Singles	11	13	0	11
Singles with Developmental or Physical Disabilities	3	5	0	4
Couples	0	4	0	3
Elderly	7	3	0	3
Families	20	13	0	8
Families with Member with Developmental Disabilities	1	1	0	1

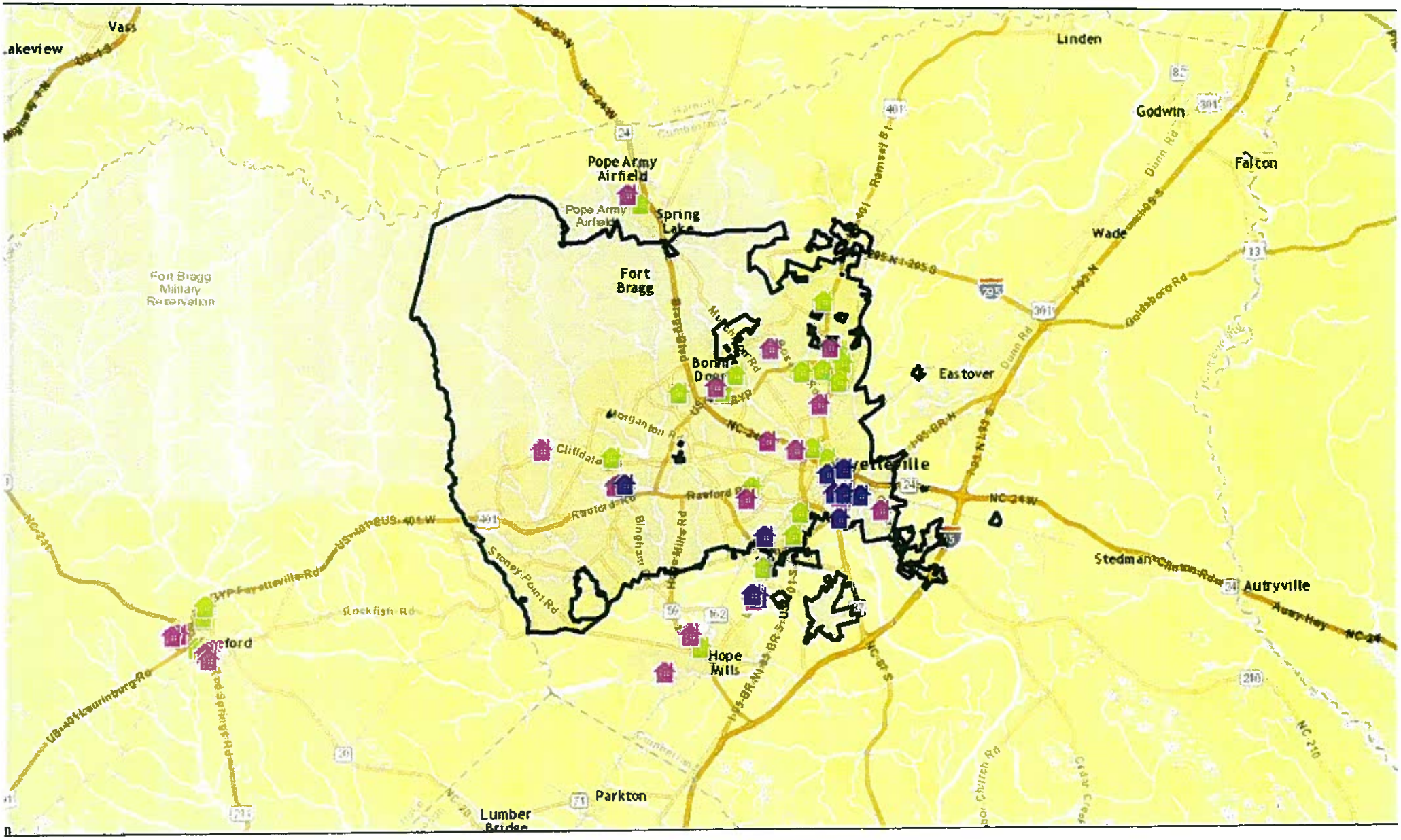
Sixteen developments have expiration dates for funding, beginning as soon as 2017 and extending as far as 2034. As the chart below shows, this will lead to the loss of 1,070 units. In the next 10 years, the region will lose 308 units of affordable housing through expirations, or approximately 7.4% of its stock.

The next pages show the location of public and affordable housing complexes, as well as the use of vouchers, throughout the city and county. As the maps suggest, while public housing is more concentrated within the downtown Fayetteville area, LIHTC and HUD Multifamily properties are scattered throughout the City and County.

CONCLUSIONS:

- The City and County both experience a shortage of affordable, accessible housing. With the high housing allowances offered to military personnel, the Fayetteville area rental and sales housing markets are somewhat inflated.
- The prevalence of wait lists for public housing and affordable housing, as well as the closed, five year long wait list for vouchers, underscores the need for housing.
- With the anticipated expiration of subsidized affordable housing projects within the next few years, the housing supply will become even more constrained.
- The tenant selection procedures for public housing do not appear to show any bias or discrimination.

CPD Maps - Public Housing, HUD Multifamily, LIHTC Properties



ebruary 24, 2015

- Public Housing Development
- LIHTC Property
- Multifamily Properties - Assisted

Override 1

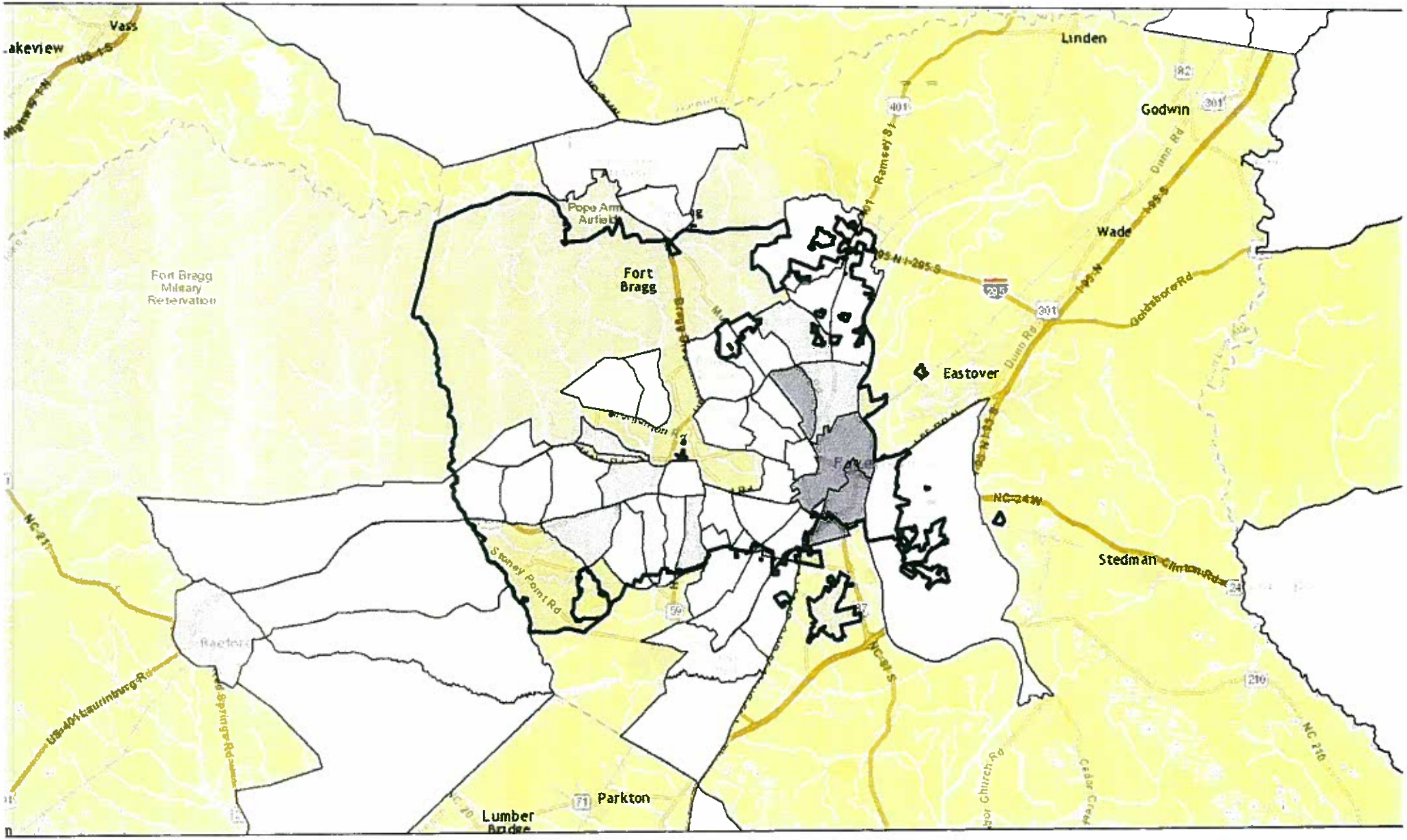
1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRC/ Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps - Voucher Concentration



ebruary 24, 2015

Override 1 **VoucherConcentration**

HCV_PCT_RENTER_OCC_UNITS

- <5.91%
- 5.91-11.58%
- 11.58-20.44%

1:321,925

0 2.75 5.5 11 mi

0 4.25 8.5 17 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCA Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTo Mapmyindia, © OpenStreetMap contributors, and the GIS User Community

E. Other Relevant Data: Workforce Development Initiatives

Many retired vets would like to stay in the region, and FTCC, and the Center for Economic Empowerment and Development, funded by the City's general fund, help to train people to start businesses.

In anticipation of a potential reduction of military personnel at Fort Bragg, NC Governor Pat McCrory has launched several initiatives in partnership with the state's colleges and community colleges, including Fayetteville Technical Community college. In February, Governor McCrory announced an economic development initiative targeted to support veterans in the area, the new Fayetteville Technical Community College's Collision Repair and Refinishing Technology Center, which will offer 19 certifications to veterans and other students. The FTCC program was developed at the request of and with the collaboration of PPG Industries, Enterprise Rent-A-Car, GEICO Insurance, Van Tuyl Automotive Group, Allstate Insurance, and Gerber Collision and Glass.

In 2014, the Governor announced a program to offer in-state tuition to recently-separated veterans at the state's public universities. By doing so, the program may keep the leadership, technical, and soft skills those veterans possess in the region. The Cumberland Workforce Development office also employs a veterans specialist to assist vets with barriers to employment.

The Office of Workforce Development also offers a program utilizing Workforce Investment Act Funds to pay employers 90% of a new employee's salary for six months while the employer provides on the job training. The program currently supports 20 employees, and boasts a 90% successful hiring rate after the six months. The office would like to grow the program, but sees reluctance on the part of employers to engage with "government red tape."

The Office of Workforce Development and the Workforce Investment Board are actively involved in meeting with local businesses and identifying their employment and skill needs. They also seek to prepare workers for those in-demand skills that may bring potential employers to Cumberland County. At the City's Neighborhood Resource Centers, Workforce Development offers free computer and job training.

Additionally, the Office works with the Cumberland County Schools to provide Career and Technical Education to train students for technical careers as well as prevent students dropping out of school. Various school academies offer instruction in Health and Sciences, Public Safety and Security, etc. Within these work-based programs, students can shadow professionals, obtain internships, and summer employment. In one initiative, students in tech classes helped to refurbish over 500 computers with the county's IT department.

CONCLUSIONS:

- The public-private efforts described above prepare the local workforce for the needs of local businesses, thus ensuring more opportunities for employment from existing businesses and those considering locating in the area.
- By increasing the skill set of the local workforce, these programs can help increase family incomes and bring housing costs within reach.

V. EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING LEGAL STATUS

FAIR HOUSING CASES

The Fayetteville-Cumberland County Human Relations Department, established in 2004, works closely with the state's Human Relations Commission, as well as other providers of Fair Housing education and services. The Fayetteville-Cumberland County office provides the following services and programs:

- Develops and fosters program and activities aimed at addressing and improving race and human relations
- Provides training on equal opportunity and human relations matters
- Administers the City's Fair Housing ordinance
- Staff support for the Human Relations Commission

Both Fort Bragg and Pope Air Force Base are authorized to enforce the Fair Housing Act for military personnel living off base. Military staff conduct investigations, negotiations, and mediations. If they are unable to resolve a complaint, they may elect to have the claims and issues asserted in the reasonable grounds determination decided in a civil action, which they can commence and enforce. Fort Bragg uses an Armed Forces Military Board. At Pope Air Force Base, the Wing Commander is the responsible party.

Fair Housing Complaints/Cases – Fayetteville-Cumberland HRC

The Fayetteville/Cumberland County Human Relations Commission reports that no formal Fair Housing cases or discrimination suits were filed locally over the 2010-15 period. The Commission reported receiving a few complaints each year, but they generally involve non-Fair Housing issues such as complaints about landlords' repairs.

The Fayetteville/Cumberland HRC noted that a few cases came close to rising to the level of formal discrimination, particularly around two tenants with disabilities that the HRC was able to resolve with the management company.

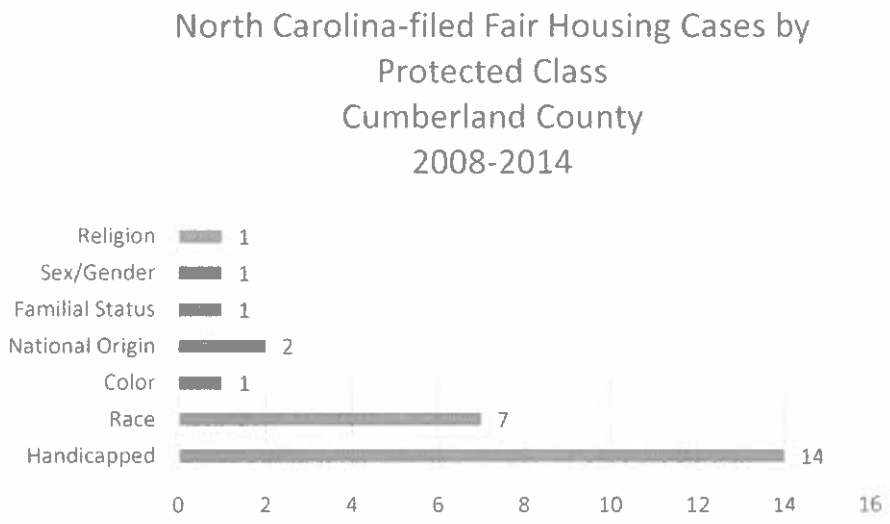
Fair Housing Complaints/Cases -- North Carolina Human Relations Commission

Acting in a similar fashion to the HUD Division of Fair Housing, the North Carolina Human Relations Commission is responsible for enforcing the North Carolina State Fair Housing Act. The Commission receives housing discrimination complaints from state parties and can also receive referrals from HUD. These cases are investigated and the Commission attempts to resolve the dispute. If the parties are unable to resolve the complaint and evidence demonstrates that discrimination has occurred, the Commission enforces the Fair Housing Act through court action or an administrative hearing. Cases can be filed for one or more violation of a protected class, for example, for race and religion. The chart below shows the violations alleged within the 23 cases.

From 2010-14, the State's Human Relations Commission closed 381 cases statewide, with an average case length of 267.4 days. (Please note that six other Fair Housing Assistance Programs, including Fayetteville/Cumberland County, which can investigate cases as well.)

The NCHRC data shows 23 Cumberland County cases from 2008 through 2014. Of the 23, 15 were referred by HUD, and HUD opened files on 20 of the cases. The most recent data suggests that 15 of the cases are closed.

Trends: For the 10 most recent cases dating back to 2010, all were for allegations of discrimination based on a person's handicapped status, with one 2013 case also alleging a violation for Color. Two cases filed in 2013 of alleged discrimination on the basis of handicapped status, resulted from systemic issues with making buildings accessible to persons with handicaps.



Please note: Some of the 23 cases alleged more than one Protected Class violation.

Of the closed cases, the following were noted.

CUMERLAND COUNTY
NORTH CAROLINA HUMAN RELATIONS COMMISION CLOSED CASES

DECISION	BASIS
Cased Closed – NO CAUSE	1 Handicap 1 Sex 3 Race
Cases Closed – Withdrawn Without Settlement	1 Handicap
Cases Closed – Withdrawn With Settlement	1 Race
Cases Closed – Withdrawn With Resolution	1 Handicap
Cases Closed – Withdrawn After Resolution	1 Race
Cases Closed – Failure to Resolve	1 Color/ Handicap

Fair Housing Complaints/Cases -- HUD

As a general practice, when a fair housing complaint is filed federally, such as through HUD, this allegation of discrimination is transferred to a substantially equivalent Fair Housing Assistance Program (FHAP) for investigation, usually the North Carolina Human Relations Commission. At the federal level,

25 cases are recorded, with six handled by HUD, and 19 referred to FHAP and included within the data above. Four of the HUD cases are closed.

HUD or FHAP	Bases	Issues	Closure Reason
HUD or NCHRC (FHAP)	National Origin, Religion,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	Complainant Failed to Cooperate
HUD	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	Complainant Failed to Cooperate
FHAP	Sex,	322 - Discriminatory advertisement - rental, 382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	No Cause
FHAP	Disability,	381 - Discrimination in terms/conditions/privileges relating to sale, 472 - Failure to provide accessible and usable public and common user areas,	No Cause
FHAP	Race,	322 - Discriminatory advertisement - rental,	No Cause
FHAP	Race,	310 - Discriminatory refusal to rent,	No Cause
FHAP	Disability,	310 - Discriminatory refusal to rent,	Withdrawal Without Resolution
HUD	Disability,	510 - Failure to make reasonable accommodation,	DOJ Dismissal
FHAP	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	Withdrawn After Resolution
FHAP	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	No Cause
FHAP	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	Withdrawn After Resolution
FHAP	Disability,	510 - Failure to make reasonable accommodation,	Withdrawn After Resolution
FHAP	Familial Status, National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental,	Withdrawal Without Resolution
FHAP	Disability,	312 - Discriminatory refusal to rent and negotiate for rental, 382 - Discrimination in terms/conditions/privileges relating to rental,	No Cause
FHAP	Disability,	510 - Failure to make reasonable accommodation,	No Cause
HUD	Disability,	500 - Failure to permit reasonable modification,	Withdrawn After Resolution
FHAP	Disability,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,	No Cause
HUD	Disability, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,	Lack of Jurisdiction
HUD	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 472 - Failure to provide accessible and usable public and common user areas, 475 - Failure to provide accessible light switches, electric outlets, etc.,	
FHAP	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 470 - Non-compliance with design and construction requirements (handicap), 472 - Failure to provide accessible and usable public and common user areas,	Conciliated/Settled

FHAP	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,	Conciliated/Settled
FHAP	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 510 - Failure to make reasonable accommodation,	No Cause
HUD	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	
FHAP	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	No Cause
FHAP	Race, Disability,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable, 510 - Failure to make reasonable accommodation,	No Cause
FHAP	Disability, National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification, 510 - Failure to make reasonable accommodation,	No Cause

CUMERLAND COUNTY
HUD CLOSED CASES

DECISION	BASIS
Cased Closed – Complainant Failed to Cooperate	1 Race
Cases Closed – Failure to Make Reasonable Accommodation DOJ Dismissal	1 Disability
Cases Closed – Withdrawn After Resolution	1 Disability
Case Closed – Lack of Jurisdiction	1 Disability/ Retaliation

FAIR HOUSING TESTING

North Carolina Fair Housing Project – Fayetteville-Cumberland

Legal Aid of North Carolina provides testing for Fair Housing, including discrimination on the basis of race, familial status, disability, and other protected classes. For example, testers might review housing design and construction accessibility issues. In Cumberland County and Fayetteville, testers reviewed 34 cases from 2012 to 2014 and found 12 instances of affirmative discrimination, with 5 in terms of accessibility for disabled persons; 10 lending cases in terms of race; 1 rental affirmative in terms of race.

The North Carolina Fair Housing Project conducted the following testing in Fayetteville and Cumberland County.

FY 2011 Grant (2012)

1 rental, family status, negative
20 accessibility, disability, 5 affirmative, 14 negative, 1 inconclusive
10 lending, race, 6 affirmative, 4 negative

FY 2012 Grant

1 rental, race, affirmative
1 accessibility, disability, negative

FY 2013 Grant

1 rental, other, information gathering

CONCLUSIONS

The Fayetteville-Cumberland County region appears to show some evidence of discrimination in terms of accessibility/disability issues as well as isolated instances of race discrimination in the rental market.

RECOMMENDATIONS: The Fayetteville/Cumberland County Human Relations Commission, along with the North Carolina Human Relations Commission and the North Carolina Fair Housing Project, may consider conducting additional training and distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens. Additionally, because many of the most recent cases tend to relate to issues of disability and accessibility, the City and County may wish to strengthen zoning ordinance focusing on housing accommodations for people with disabilities.

VI. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

A. PUBLIC SECTOR

A thorough review of City zoning regulations, including land use controls, zoning ordinances, building codes, fees and charges, growth limits, and any other policies that can affect the return on residential resulted in no findings of policies that might limit the development of affordable housing. Discussions with planning, building, inspections, and other officials confirmed that current local public policies are not adversely creating barriers to the development of affordable housing.

Specifics are included below.

Public Sector- Zoning

- A review of Cumberland County and city of Fayetteville zoning found a large variety of zoning classifications available, serving low-density, high density and medium density residential development.
- While low-density and medium density residential can be cost prohibitive for affordable housing; Interviews with city of Fayetteville zoning authorities found that rezoning options were available in a streamlined and relatively short time line.
- Interviews with city of Fayetteville zoning and planning found that the community resistance challenges to affordable housing development were decided based on developer's rights, and not in favor of those challenging affordable housing development who typically lived in adjacent communities and were concerned over loss in property values.
- It is believed that inclusionary zoning would inhibit development due to building costs and return on investment for developers and builders. There is no perceivable movement towards inclusionary zoning in the county or city.

Recommendations for planning and zoning

1. It is recommended that emphasis on inclusionary zoning be replaced with emphasis on subsidized new housing to replace the districts older housing stock. Due to the relative high-cost of building as compared to return on investment, newer subsidized housing would depend on grants, tax relief, accessible loans, and developer incentive.
2. Nonprofit housing suppliers have identified a deficiency in lending availability that prevents many prospective buyers from obtaining homeownership. Deficiencies include lending restrictions based on credit scores and income. Recommend evaluation of lending availability as compared to the areas perspective affordable housing buyer, and provide suitable lending options that may include poor credit options and rent to own options.

Public-Sector- neighborhood revitalization, municipal and other services, employment-housing,-transportation linkage.

The Cumberland County 2030 Growth Vision Plan remains the overall framework in which the City and County have developed and revitalized the region. The City of Fayetteville has created a redevelopment zone along the Murchison Road corridor and has studied the Ramsey Street corridor for potential redevelopment. County projects include the recruitment and development of an IHOP restaurant in Spring Lake.

In January, 2015, eleven census tracts were designated as HUB Zones in Cumberland County, including many of the lowest-income census tracts. The map in the Appendix highlights these zones.

Interviews with the Cumberland County and city of Fayetteville transportation departments found that a high percentage of fixed route ridership was for the purpose of employment.

It is believed that the city of Fayetteville's transportation fixed route service provides exceptional transportation services to the public with the exception of recommendations found below.

In 2010 the city of Fayetteville updated its 10 year Transit Development Plan for the Fayetteville Area System of Transit (FAST). This study assesses the effects of recent improvements and changes in both development patterns and demographics that have occurred since 2008. Key aspects of the study include a thorough analysis of current transit services, development of strategies to address current and projected needs, and identification of capital and operational costs. Some highlights of accomplishments and continued needs are as follows.

- The city of Fayetteville fixed route buses have a weekday ridership of approximately 6000 Saturday ridership of approximately 4000.
- The city of Fayetteville has upgraded its fleet within the past five years, all busses were replaced with new busses with the exception of two fixed route busses that have been completely renovated.
- The city of Fayetteville has added routes to provide substantial coverage within the city limits. Additional routes are planned as the veteran's clinic near completion, and outlying undeveloped areas undergo development.
- The city of Fayetteville is constructing a new centralized transit hub that will increase efficiency and lower transit times for riders.
- The city of Fayetteville transit PLANS to add additional buses to routes with highest demands with the goal of providing shorter wait times.
- The city of Fayetteville transit PLANS to add fixed route service on Sundays. Sundays are not currently served by fixed route buses, however these services are needed to provide transportation to employment.

Recommendations for City of Fayetteville transit system.

6. Greater frequency – more routes with 30-minute headways
7. Later evening service to provide transportation from employment.
8. Sunday service to provide transportation to and from employment.
9. Flexibility to respond to emerging mobility needs
10. Service into unserved areas of the county with higher density to provide transportation to and from employment.

Cumberland County offers limited transportation services through grants. The county has severe budget limitations that prevent it from operating sufficient transportation options. It is believed the counties programs do not satisfy the needs of the public who live beyond the city limits. In all cases, County residents must make advanced arrangements for transportation services. All transportation services in the county jurisdiction are provided through grant and have financial limitations that impact service availability. Grants as follows

- Cumberland County receives grants from the Elderly and Disabled Transportation Assistance Program. In order to assist the elderly and disabled with their transportation needs, the

Community Transportation Program offers eligible clients free transportation assistance to medical appointments and pharmacy pickups within Cumberland County.

- Cumberland County receives grants from the Urban Employment Transportation. The Community Transportation Program provides transportation to the general public. This program offers urban area residents with no access to public transportation, access to school and/or work. Eligible clients must be residing in an urban area of the county, as determined by the 2000 Census. Trips are provided Monday through Friday from 5 a.m. to 8 p.m. for a cost of $2.25 per one-way trip.
- Cumberland County receives grants from Rural General Public Transportation. With this grant, the Community Transportation Program provides transportation to the general public. This program offers our rural residents the opportunity to access health care, education, shopping, and employment. Eligible clients must be residing in a rural area of the county, as determined by the 2000 Census. Trips are provided Monday thru Friday from 5 a.m. to 8 p.m. for a cost of $2.25 per one-way trip.

Recommendations for Cumberland County transit system

1. Development of a 5 & 10 year comprehensive plan to provide adequate and effective transportation for employment and medical purposes.
2. A partnership with the city of Fayetteville to extend city fixed route services to densely populated areas of the county within 2 miles of city limit.

Public-sector – Sale of subsidized housing and possible displacement

- There is no evidence to suggest that residences and businesses are being displaced by rehabilitation and revitalization of deteriorated neighborhoods.
- There is evidence to suggest that older homes within the city and County fall into disrepair after becoming vacant for extended periods. Vacant homes often suffer from accelerated deterioration, vandalism and theft of mechanical, plumbing, and electrical components. In many cases, abandoned homes fall into a state of disrepair such that it's cost prohibitive to restore them resulting in voluntary or forced demolition. The percentage of non-habitable or demolished homes as compared to the available housing was not thought to create a burden for affordable housing.
- As observed in viewing neighborhoods with a high proportion of boarded-up homes, rehabilitation of such homes seem to be in character with the surrounding community.
- When questioned about this issue of displacement by revitalization, County and city officials in multiple departments had no knowledge of areas where housing displacement and gentrification were active.

Public Sector- Property tax policies

- A review of city and county tax policy, tax rates, and valuation did not find any evidence to suggest that tax policies were inhibiting affordable or accessible housing.
- Cumberland County and the city of Fayetteville participate in state-mandated tax relief for low income owner occupied homes of the elderly, disabled, and veterans.
- Landlords providing homes for the low income tenants, elderly, disabled and veterans do not receive tax relief under the state-mandated program.

- Discussions with developers in the region suggest that some changes at the state level regarding the State Tax Credit Program will have an adverse effect on the number of new and rehab developments in the future. In the past, one developer stated, the state tax credits supplemented the federal program. The new Workforce Housing Loan program is not open to all counties.
- Another developer stated that the continued exemptions from taxes on vacant land is important to developing affordable housing, and that the New Market Tax Credit Investments fund very-low interest loans (about 1%) to their affiliates to build or acquire homes to sell to families.

Public Sector- Planning and zoning boards

- A review of Cumberland County and city of Fayetteville zoning found a large variety of zoning classifications available, serving low-density, high density and medium density residential development.
- While low-density and medium density residential can be cost prohibitive for affordable housing; Interviews with city of Fayetteville zoning authorities found that rezoning options were available in a streamlined and relatively short time line.
- Interviews with city of Fayetteville zoning and planning found that the challenges to affordable housing development were decided based on developer's rights, and not in favor of those challenging affordable housing development who typically lived in adjacent communities and were concerned over loss in property values.

Public Sector – Building codes for accessibility

- Through a review of zoning ordinances and interviews with public officials, no provisions for affordable or accessible inclusionary zoning in the Cumberland County and the city of Fayetteville were found.
- Cumberland County and the city of Fayetteville have adopted the ADA codes adopted and enforced state building codes requiring 5% of multi-family over 11 units be ADA compliant.
- Due to the areas aging housing stock and functional obsolescence of existing structures and surrounding communities, it would be cost prohibitive to upgrade many of the structures and communities to accessibility for the disabled.
- Planning officials noted that the state is currently revising its state building codes based on 2015 national building codes. These state changes will take place over the next few years and will be reflected in county codes beginning in January 2019. Depending on what the state mandates, subsequent changes to county codes may affect the cost of building affordable housing in the county.

Recommendations relating to building codes for accessibility

1. It is recommended that emphasis on inclusionary zoning be replaced with emphasis on subsidized new housing to replace the districts older housing stock. Due to the relative high-cost of building as compared to return on investment, newer subsidized housing would depend on grants, tax relief, accessible loans, nonprofit housing suppliers and developer incentive.
2. Nonprofit housing suppliers have identified a deficiency in lending availability that prevents many prospective buyers from obtaining homeownership. Deficiencies include lending restrictions based on credit scores and income. Recommend evaluation of lending availability as

compared to the areas perspective affordable housing buyer, and provide suitable lending options that may include poor credit options and rent to own options.

CONCLUSIONS

1. It is recommended that emphasis on inclusionary zoning be replaced with emphasis on subsidized new housing to replace the districts older housing stock. Due to the relative high-cost of building as compared to return on investment, newer subsidized housing would depend on grants, tax relief, accessible loans, and developer incentive.
2. Nonprofit housing suppliers have identified a deficiency in lending availability that prevents many prospective buyers from obtaining homeownership. Deficiencies include lending restrictions based on credit scores and income. Recommend evaluation of lending availability as compared to the areas perspective affordable housing buyer, and provide suitable lending options that may include poor credit options and rent to own options.

Recommendations for City of Fayetteville transit system.

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7. Service into unserved areas of the county with higher density to provide transportation to and from employment.

Recommendations for Cumberland County transit system

8. Development of a 5 & 10 year comprehensive plan to provide adequate and effective transportation for employment and medical purposes.
9. A partnership with the city of Fayetteville to extend city fixed route services to densely populated areas of the county within 2 miles of city limit.

VI. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE (continued)

B. PRIVATE SECTOR

Lending Policies and Practices

The ability to enjoy the benefits and comforts of home ownership are dependent on financial resources to purchase a home. The ability to obtain a loan from a bank or other financial institution is therefore foundational to home ownership. Over 80 million homes are financed through mortgages in the United States.

Discriminatory lending practices include declining mortgage applications from affected groups or offering particular groups more expensive and less desirable mortgage terms and conditions. Formed in 1986 as a project of North Carolina Legal Services, the Reinvestment Partners nonprofit, headquartered in Durham, NC, tests seeks economic justice for underserved communities and advocates changes to lending practices, secures financing agreements for low-income areas, and tests lending practices throughout the United States. It has not yet tested the Cumberland County area, but it did suggest that the greater number of Veterans Administration loans might be a factor in the housing and lending markets.

This analysis reviewed home mortgage applications from the Fayetteville and Cumberland County region from 2011 to 2013 through decline rates based on race, ethnicity, or gender. The applications reviewed met the following criteria:

- One- to Four-Family Dwelling
- Manufactured Homes
- Owner Occupied as Principal Dwelling
- Secured by a First Lien
- Home Purchase
- Fayetteville MSA – Cumberland County only

Disproportionate Share of Declines

- In order to identify whether an ethnic/racial or gender group is considered to have a disproportionately greater number of lending declines, we will adapt the HUD definition regarding disproportionate share of housing problems: that is, when the percentage of people in a group reporting being declined exceeds the percentage for all ethnic/racial/gender groups as a whole by ten percentage points.

The data does suggest some areas of potential concern in terms of decline rates among racial, ethnic, and gender groups within particular geographic areas. In particular, applicants from Black or African Americans and American Indian or Alaska Native populations appear to be disproportionately declined for mortgages overall and within particular income ranges, and one income range for Asians appears to be disproportionately declined.

Overall results:

- 9,080 home purchase applications were reviewed, with 7,173 approved (79%) and 1,907 declined (21%).
- 41% of American Indian or Alaska Native applications were declined, and 32% of Black/African American applications were declined
- 14% of Hispanic/Latino applicants were declined
- 30% of female applicants and 16% of male applicants were declined
- Applicants from Census Tracts 5, 16.01, 16.03, and 38 represented 7.7% of all applications and 21.3% of total declines.
- Detailed Results are provided below. Additionally, the Appendix provides detailed tables of data for further review.
- The data does suggest that some groups may be declined at disproportionately higher rates. Using the HUD definition for disproportionate share (ie., 10% higher than average for peer groups). By Census Tract (and to examine potential redlining issues), the analysis finds that Blacks/African Americans are disproportionately declined in 23 Census Tracts, by far the most affected group.

Whites represented 61% of all applicants and 42% of declines. Black/African Americans represented 25% of all applicants and 38% of all declines.

Fayetteville/ Cumberland County
Decline Rates by Race -- TOTALS
2011-13

Race	Declines	Originated	Grand Total	Decline Rate
American Indian or Alaska Native	44	63	107	41%
Asian	41	199	240	17%
Black or African American	722	1570	2292	32%
Info not provided	287	586	873	33%
Native Hawaiian or Other Pacific Islander	9	55	64	14%
Not applicable		1	1	33%
White	804	4699	5503	14%
Grand Total	1907	7173	9080	21%

Hispanic/Latinos represented 8% of all applicants and 5% of all declines.

Fayetteville/ Cumberland County
Decline Rates by Ethnicity -- TOTALS
2011-13

Ethnicity	Declines	Originated	Grand Total	Decline Rate
Hispanic or Latino	97	610	707	14%
Info Not Available	691	573	1264	55%
Not applicable		1	1	0%
Not Hispanic or Latino	1119	5989	7108	16%
Grand Total	1907	7173	9080	21%

Females represented 28% of all applicants and 39% of all declines.

Fayetteville/ Cumberland County
Decline Rates by Gender -- TOTALS

2011-13	Declines	Originated	Grand Total	Decline Rate
Female	752	1753	2505	30%
Info not provided	213	370	583	37%
Male	942	5050	5992	16%
Grand Total	1907	7173	9080	21%

As shares of total applications, four Census Tracts had significantly higher shares of declines than they did applicants.

- Census Tract 5 had 1.8% of all applications and 7% of all declines
- Census Tract 38 had 1.3% of applications and 5% of declines
- Census Tract 16.01 had 3.3% of applications and 6.2% of declines
- Census Tract 16.03 had 1.3% of applications and 3.1% of declines

Fayetteville/Cumberland County
Decline Rates by Census Tract -- TOTALS

2011-13	Declines	Originated	Grand Total	Decline Rate
1	21	5	26	81%
2	13	7	20	65%
4		2	2	0%
5	133	34	167	80%
6	16	87	103	16%
7	6	84	90	7%
7.01	8	99	107	7%

7.02	4	48	52	8%
8	9	74	83	11%
9	18	109	127	14%
10	4	3	7	57%
11	16	19	35	46%
12	29	70	99	29%
13	1		1	100%
14	59	110	169	35%
15	24	76	100	24%
16.01	119	181	300	40%
16.02	20	122	142	14%
16.03	60	58	118	51%
16.04	49	129	178	28%
17	33	208	241	14%
18	9	21	30	30%
19.01	8	40	48	17%
19.02	17	62	79	22%
19.03	11	47	58	19%
20	4	37	41	10%
20.01	5	16	21	24%
20.02	26	40	66	39%
21	17	85	102	17%
22	5	19	24	21%
23	17	54	71	24%
24	11	12	23	48%
24.01	1	1	2	50%
24.02	5	17	22	23%
25.01	42	116	158	27%
25.02	12	142	154	8%
25.03	26	144	170	15%
25.04	30	235	265	11%
26	32	115	147	22%
27	43	227	270	16%
28	61	198	259	24%
29	66	88	154	43%
30	21	231	252	8%
30.01	74	466	540	14%
30.02	14	37	51	27%
31	30	212	242	12%
31.02	15	148	163	9%
31.03	12	101	113	11%

31.04	62	147	209	30%
32.01	75	547	622	12%
32.03	26	112	138	19%
32.04	37	141	178	21%
32.05	18	121	139	13%
33.02	9	63	72	13%
33.04	24	116	140	17%
33.05	20	91	111	18%
33.06	34	242	276	12%
33.07	19	104	123	15%
33.08	31	56	87	36%
33.09	18	146	164	11%
33.1	7	58	65	11%
33.11	23	18	41	56%
33.12	13	121	134	10%
33.13	21	176	197	11%
33.14	18	107	125	14%
34	2		2	100%
34.01	1		1	100%
34.06	3		3	100%
34.07	1		1	100%
34.08	1		1	100%
35	12	39	51	24%
36	22	87	109	20%
37	58	226	284	20%
38	96	18	114	84%
9801		1	1	0%
Grand Total	1907	7173	9080	21%

In terms of decline rates by the applicant's Census Tract median income compared to the area's median income, the 30-49.99% AMI cohort had the highest decline rates of 82%.

Fayetteville/ Cumberland County

Decline Rates by Tract Income to Area Median Income ($52,700)

2011-13

	Declines	Originated	Grand Total	Decline Rate
Under 30% Med Inc	1	5	6	17%
30-49.99% Med Inc	135	29	164	82%
50-79.99% Med Inc	258	351	609	42%
80-100% Med Inc	510	1593	2103	24%
100-124.99% Med Inc	570	2776	3346	17%
125-149.99% Med Inc	358	1818	2176	16%
150-199.99% Med Inc	61	417	478	13%
200% + Med Inc	14	183	197	7%
blank		1	1	0%

An analysis of decline rates by race and income shows that, for some income bands, American Indian or Alaska Native, Black or African American, and Asian applicants were declined as disproportionately higher rates, and that the first two groups as a whole were declined at disproportionately higher rates. These groups are noted in red in the chart below.

Fayetteville/Cumberland County

Decline Rates by Income and Race

2011-2013

	American Indian or Alaska Native	Asian	Black or African American	Info not provided	Native Hawaiian or Other Pacific Islander	White	Grand Total
$0-9999	NA	NA	100%	100%	NA	100%	100%
$10K-14999	50%	67%	100%	100%	0%	83%	90%
$15K-24999	67%	50%	70%	81%	0%	49%	61%
$25K-49999	51%	21%	40%	43%	7%	18%	27%
$50K-74999	30%	12%	22%	21%	4%	12%	15%
$75K-99999	20%	8%	17%	17%	27%	10%	12%
$100K-149999	25%	8%	10%	17%	17%	8%	9%
$150-199999	0%	33%	11%	14%	NA	6%	9%
$200K+	100%	6%	6%	36%	50%	6%	9%
blank	0%	NA	NA	NA	NA	NA	
	41%	17%	32%	34%	11%	15%	21%

Please note: American Indian/Alaska Natives in $200K is based on only one app. Native Hawaiian or Other Pacific Islander in $200K is based on only two apps.

The analysis then considered declines by Census Tract, which can have variations within income levels and therefore are not as robust an indicator of disproportionate affect as the income analysis above. By the HUD definition, we define the following groups to be considered potentially disproportionately declined for home mortgage loans. This analysis considered groups with 5 or more applications within that jurisdiction.

Census Tract	Overall Decline Rate	Potential Dispropor Affected Racial Group & Decline Rate	Potential Dispropor Affected Ethnic Group & Decline Rate	Potential Dispropor Affected Gender Group & Decline Rate
1	81%	Black/African American 100%		
9	14%	Black/African American 43%		
10	57%	Black/African American 80%		
14	35%	Black/African American 48%		Females 52%
16.01	40%	Amer Ind/Alaska Nat 83% Black/African American 59%		Females 57%
16.03	51%	Amer Ind/Alaska Nat 86% Black/African American 78%		
16.04	28%			Females 46%
17	14%	Asian 60%	Hispanic/Latino 24%	
19.01	17%	Black/African American 28%		
19.03	19%			Females 30%
20.01	24%			Females 40%
20.02	39%	Black/African American 61%		Females 57%
22	21%	Black/African American 50%		
24	48%	Black/African American 69%		Females 78%
24.02	23%			Females 43%
25.01	27%	Black/African American 38%		
25.02	8%	Black/African American 20%		
26	22%	Black/African American 35%		
27	16%			Females 31%
28	24%	Amer Ind/Alaska Nat 50%		
29	43%	Black/African American 61%		
30.01	14%			Females 24%
30.02	27%	Black/African American 54%		Females 57%
31	12%	Black/African American 28%		Females 24%
31.02	9%		Hispanic/Latino 20%	
31.03	11%	Black/African American 24%		
31.04	30%	Black/African American 40% Amer Ind/Alaska Nat 40%		Females 41%
32.01	12%	Amer Ind/Alaska Nat 33%		
32.03	19%	Black/African American 29%		
32.04	21%	Black/African American 38%		
32.05	13%	Asian 50%		
33.04	17%	Black/African American 27%		
33.07	15%	Black/African American 27% Asian 40%		

33.1	11%			Females 21%
33.11	56%	Black/African American 71%		Females 81%
35	24%			Females 50%
37				Females 31%
38	84%	Amer Ind/Alaska Nat 100%		

Decline Reasons by Subgroup

As evidenced by the information regarding decline reasons within the CFPB data included within the Appendix, an analysis of decline reasons is hampered by the lack of detailed information. In fact, 87% of the decline reasons are "blank." Among the reasons for which there is information, it appears that all racial groups, ethnic groups, and gender groups are generally declined for "Credit History" or for "Debt to Income Ratio."

Data Limitation: The CFPB dataset did not provide applicant age within its database; therefore, this analysis does not address loan approvals or declines by age.

CONCLUSIONS

- An analysis of decline rates by race and income shows that, for some income bands, American Indian or Alaska Native, Black or African American, and Asian applicants were declined as disproportionately higher rates, and that the first two groups as a whole were declined at disproportionately higher rates.
- It is unclear at this time whether predatory lending exists; additional analysis is required to determine the pattern of loans being offered within various affected groups.

RECOMMENDATIONS: The City and County's Human Relations Commission, along with the North Carolina Human Relations Commission and the Reinvestment Partners group, may consider distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens.

While it is unclear if predatory lending is a concern, information regarding predatory loans would also help vulnerable groups to achieve fair lending for their home purchase.

FHAP Informational Programs

Fayetteville-Cumberland Human Relations Commission: Training & Education

On March 1, 2014, the Fayetteville Cumberland HRC received a grant for training and education. The Project Manager was hired in late June, 2014. Through February 28, 2015, the office has provided the following services to county citizens.

- Developed, printed and distributed 10,000 Fair Housing Brochures (7,000 English, 3,000 Spanish)
- Produced 3 Fair Housing Videos
- Developed Fair Housing Webpage material for new domain site
- Provided 10 Fair Housing Workshops (rental management, housing counselors, housing for the disabled, seniors, homebuyers) (235 participants)
- Developed 5 power point educational presentations on Fair Housing and Landlord Tenant
- Developed Fair Housing Training Surveys and data collection tools

- Outreach activities: Participated in 2 Homeless and Hunger Stand Downs, several Veteran Celebrations, 2 MLK Breakfast, and monthly ADA meetings as well as 2 other monthly meetings.
- Complete timely quarterly reports to grant funder
- Provided assistance to 52 citizens with housing issues.

In 2014, Cumberland County mailed HOME funds recipients a distribution list for special outreach efforts for targeted populations, to include updates and contact info for several minority newspapers

HOME funds recipients were notified of fair housing training provided by the CCCD in partnership with Fayetteville-Cumberland Human Relations Department. Certification letters were mailed to attendees of the Fair Housing Training. Fair Housing Brochures (English and Spanish) were sent to HOME Funds recipients with instructions on placement of brochures.

The NC Indian Housing Authority distributes Fair Housing brochures and other literature to its clients and its staff has attended fair housing trainings offered by the Human Relations Department.

The Human Relations staff has a close working relationship with the Fayetteville-Cumberland Council for People with Disabilities to provide information and support on fair housing issues.

Fair Housing Surveys

Forty four citizens responded to questions regarding their knowledge of Fair Housing laws and of how to file a Fair Housing Report within the City or county.

Of that number, 69% reported being aware of Fair Housing Laws, and 24% knew how to file a Fair Housing Report within Fayetteville or Cumberland County, suggesting the need for additional training, education, and publicity/dissemination of Fair Housing information within the region.

Determination of Unlawful Segregation

There has been no determination of unlawful segregation under Title VI of the Civil Rights Act of 1964.

VII. Assessment of Current Public and Private Fair Housing Programs and Activities to the Jurisdiction

The City of Fayetteville and Cumberland County are clearly working towards achieving Fair Housing Choice for all citizens from all groups. Since 2010, the region has addressed issues of transportation, expanding affordable housing choices, making Fair Housing a key element of zoning and planning, and educating citizens in an effort to combat NIMBY-ism. Nonetheless, there are still opportunities to address impediments in place through additional research and resolution. The recommendations are included below.

VIIII. Conclusions and Recommendations

As previously stated, the commitment of the City of Fayetteville and Cumberland County to Fair Housing for all citizens is clearly evident, and significant progress has been made since 2010.

CONCLUSIONS -- DEMOGRAPHICS

- People living within Fayetteville tend to have different experiences than those outside the county in terms of the diversity of its community
- Fayetteville, with two-thirds of the county's population, is 13X bigger than the second largest town in the county, Hope Mills
- The largest concentrations of minority residents appear to be in the downtown Fayetteville and Spring Lake areas, particularly in Census Tracts 24.02, 2, and 38.
- The largest concentration of white residents tends to be in the towns northeast of Fayetteville, including Falcon, Godwin, and Linden
- Fayetteville is a diverse community, although some areas that are heavily concentrated toward minorities also tend to be some of the lowest income areas

CONCLUSIONS -- INCOME

- While several communities with high levels of minority concentration have high median incomes, some of the Census Tracts with the highest levels of minority concentration also have some of the lowest median income levels for the region.

CONCLUSIONS -- EMPLOYMENT

- Unemployment rates are falling through the region, most recently from 8.1% in July 2014 to 6.1% in December, 2014.
- The Leisure and Hospitality and Education and Health Services sectors offered the greatest job growth in the last half of 2014.

CONCLUSIONS – WORKFORCE EDUCATION & ATTRIBUTES

- Employers seek more employees in specific higher tech skills, such as welders or machinists, and are also interested in those soft skills – such as dressing appropriately, arriving on time, working in teams, and taking instruction – that military personnel often excel in.
- The region's share of college graduates lags that of the US overall, but the region has a rich resource of technical and soft skills through the workers at Fort Bragg and Pope Air Force Base.

- The area has an opportunity to strengthen its share of college graduates and technical workers to meet the job opportunities of the future.

CONCLUSIONS – HOUSING PROFILE

- The City and County both experience a shortage of affordable, accessible housing. With the high housing allowances offered to military personnel, the Fayetteville area rental and sales housing markets are somewhat inflated.
- The prevalence of wait lists for public housing and affordable housing, as well as the closed, five year long wait list for vouchers, underscores the need for housing.
- With the anticipated expiration of subsidized affordable housing projects within the next few years, the housing supply will become even more constrained.
- The tenant selection procedures for public housing do not appear to show any bias or discrimination.

CONCLUSIONS – WORKFORCE DEVELOPMENT

- The public-private efforts described above prepare the local workforce for the needs of local businesses, thus ensuring more opportunities for employment from existing businesses and those considering locating in the area.
- By increasing the skill set of the local workforce, these programs can help increase family incomes and bring housing costs within reach.

CONCLUSIONS – FAIR HOUSING CASES & RESOLUTION

- The Fayetteville-Cumberland County region appears to show some evidence of discrimination in terms of accessibility/disability issues as well as isolated instances of race discrimination in the rental market.

RECOMMENDATIONS: The Fayetteville/Cumberland County Human Relations Commission, along with the North Carolina Human Relations Commission and the North Carolina Fair Housing Project, may consider conducting additional training and distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens. Additionally, because many of the most recent cases tend to relate to issues of disability and accessibility, the City and County may wish to strengthen zoning ordinance focusing on housing accommodations for people with disabilities.

CONCLUSIONS & RECOMMENDATIONS – ZONING & PUBLIC POLICIES

1. It is recommended that emphasis on inclusionary zoning be replaced with emphasis on subsidized new housing to replace the districts older housing stock. Due to the relative high-cost of building as compared to return on investment, newer subsidized housing would depend on grants, tax relief, accessible loans, and developer incentive.
2. Nonprofit housing suppliers have identified a deficiency in lending availability that prevents many prospective buyers from obtaining homeownership. Deficiencies include lending restrictions based on credit scores and income. Recommend evaluation of lending availability as compared to the areas perspective affordable housing buyer, and provide suitable lending options that may include poor credit options and rent to own options.

Recommendations for City of Fayetteville transit system.

3. Greater frequency – more routes with 30-minute headways
4. Later evening service to provide transportation from employment.
5. Sunday service to provide transportation to and from employment.
6. Flexibility to respond to emerging mobility needs
7. Service into unserved areas of the county with higher density to provide transportation to and from employment.

Recommendations for Cumberland County transit system

8. Development of a 5 & 10 year comprehensive plan to provide adequate and effective transportation for employment and medical purposes.
9. A partnership with the city of Fayetteville to extend city fixed route services to densely populated areas of the county within 2 miles of city limit.

CONCLUSIONS – LENDING PRACTICES

- An analysis of decline rates by race and income shows that, for some income bands, American Indian or Alaska Native, Black or African American, and Asian applicants were declined as disproportionately higher rates, and that the first two groups as a whole were declined at disproportionately higher rates.
- It is unclear at this time whether predatory lending exists; additional analysis is required to determine the pattern of loans being offered within various affected groups.

RECOMMENDATIONS: The City and County's Human Relations Commission, along with the North Carolina Human Relations Commission and the Reinvestment Partners group, may consider distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens.

While it is unclear if predatory lending is a concern, information regarding predatory loans would also help vulnerable groups to achieve fair lending for their home purchase.

IX. SIGNATURE PAGE

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for Cumberland County and the City of Fayetteville, North Carolina is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program regulations.

Cumberland County	City of Fayetteville

Bibliography

National Fair Housing Alliance. *Fair Housing Trends Report 2014: Expanding Opportunity: Systematic Approaches to Fair Housing.* Washington, DC: National Fair Housing Alliance, August 13, 2014. retreived from http://www.nationalfairhousing.org/Portals/33/2014-08-13_Fair_Housing_Trends_Report_2014.PDF

APPENDIX

Agency/Group/ Organization	Organization Type	What section of Plan was Addressed?	How was Organz consulted and what are anticipated outcomes of the consultation or areas for improved coordination?
Cape Fear Valley Hospital	Services -- Health; Services -- Homeless; Health Agency; Publicly Funded Institution/System of Care; Civic Leaders	Housing Need Assessment; Homeless Needs -- Chronically Homeless; Homeless Needs -- Veterans; Homelessness Strategy; Non-Homeless Special Needs	Cape Fear Valley Hospital works closely with the CoC and health and social service providers to find housing with supportive services for people discharged from the hospital.
City of Fayetteville Transit Department	Other government - Local	Market Analysis; Non-housing Community Development Strategy	The transit department is a key partner in providing and continually expanding transportation options for low-income residents commuting to employment and school.
City of Fayetteville/ Cumberland County Continuum of Care on Homelessness	Continuum of Care; Services -- Homeless	Housing Need Assessment; Public Housing Needs; Homeless Needs -- Chronically Homeless; Homeless Needs -- Families with Children; Homeless Needs -- Veterans; Homeless Needs -- Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Non-housing Community Development Strategy; Anti-poverty strategy	The Continuum of Care, comprised of representatives from government, nonprofit, and private shelter, housing, and supportive service providers, seeks to increase access to shelters and services for homeless people. Through coordinated intake, referrals, and services, the CoC works to help homeless people find housing and become self-sufficient.
Cumberland County Community Development	Services -- Employment; Housing	Housing Needs Assessment; Market Analysis; Non-housing Community Development Strategy	Two members of the Community Development Department offered their detailed insights regarding their efforts to develop affordable housing; the community's housing and service needs; collaborations with other agencies; and economic development initiatives.

Cumberland County Department of Public Health	Health Agency; Services -- Health; Services -- Children; Services -- Elderly Persons; Services -- Persons with Disabilities; Services -- Persons with HIV/AIDs	Housing Needs Assessment; Homeless Needs -- Chronically Homeless; Homeless Needs -- Families with Children; Homeless Needs -- Veterans; Homeless Needs -- Unaccompanied Youth; Non-Homeless Special Needs; Anti-Poverty Strategy; Lead-Based Paint Strategy	The county Department of Public Health works closely with other nonprofit and hospital providers to coordinate care for low-income and homeless individuals and families.
Cumberland County Department of Social Services	Services -- Education; Services -- Children; Services -- Elderly; Services -- Persons with Disabilities; Services -- Homeless; Services -- Persons with HIV/AIDS; Services -- Victims of Domestic Violence; Child Welfare Agency	Homeless Needs -- Families with Children; Homeless Needs -- Unaccompanied Youth; Non-homeless special needs; Non-housing Community Development strategy; Market Analysis; Anti-poverty strategy	DSS offers services to vulnerable children and families, including homeless people, mentally ill people, disabled people, elderly people, veterans, people with HIV/AIDS, and victims of domestic violence. DSS also works to connect clients with housing and services throughout the community.
Cumberland County Planning	Planning	Market Analysis; Lead Based Paint Strategy; Other (Fair Housing)	As a longtime housing development partner, the Planning department provided insights on zoning, planning, and code issues that facilitate the development of affordable housing.
Cumberland County Schools	Services -- Education; Services -- Children; Services -- Persons with Disabilities; Services -- Homeless	Homeless Needs -- Families with Children; Homeless Needs -- Unaccompanied Youth; Non-homeless special needs; Non-housing Community Development strategy; Market Analysis; Anti-poverty strategy; Homelessness Strategy	The county schools play an integral role in connecting low-income and homeless families with housing and other services. The schools also provide support for 525 homeless or unaccompanied youth (per the McKinney-Vento definition.)
Cumberland County Tax Office	Other government - County	Market Analysis; Other (Fair Housing)	The County tax office was consulted to determine whether any specific tax policies inhibit the development of affordable housing in the region.

Fayetteville Community Development	Services -- Employment; Housing	Housing Needs Assessment; Market Analysis; Non-housing Community Development Strategy	Four members of the Community Development Department offered their detailed insights regarding their efforts to develop affordable housing; the community's housing and service needs; collaborations with other agencies; and economic development initiatives.
Fayetteville Habitat for Humanity	Housing; Regional Organization	Housing Needs Assessment Market Analysis	This organization is a leading developer of low-income and affordable housing in the city and county.
Fayetteville Metropolitan Housing Authority	PHA; Housing	Housing Needs Assessment; Public Housing Needs; Anti-poverty strategy	The FMHA manages 1,045 units of public housing and receives funding and support from the Community Development Department.
Fayetteville Regional Association of Realtors	Business Leaders; Civic Leaders	Market Analysis; Other (Fair Housing)	The Fayetteville Realtors provided feedback and data regarding housing market trends and fair housing issues.
Fayetteville/ Cumberland County Human Relations Commission	Services -- Fair Housing	Housing Needs Assessment; Market Analysis; Other (Fair Housing)	Two members of the local Human Relations Commission shared their insights regarding their efforts to ensure equal opportunities for all citizens to obtain decent, affordable, and safe housing.
Fayetteville/ Cumberland Workforce Development	Services -- Employment; Services -- Education	Non-housing Community Development strategy; Market Analysis; Anti-poverty strategy	Through a partnership with Fayetteville Technical Community College and the county schools, this organization provides training and job support to local citizens. Two members shared information regarding upcoming training and other workforce initiatives.

Kingdom Community Development Corporation	Housing Regional Organization Business Leaders	Housing Needs Assessment Market Analysis Services -- Education	This organization is a leading developer of low-income and affordable housing in the city and county. Additionally, the organization provides affordable housing and debt management classes for low-income people.
North Carolina Human Relations Commission	Services -- Fair Housing; Other government -- State	Housing Needs Assessment; Market Analysis; Other (Fair Housing)	The NC Human Relations Commission shared their insights regarding their efforts to ensure equal opportunities for all citizens to obtain decent, affordable, and safe housing. They also provided data regarding Fair Housing complaints and cases.
North Carolina Legal Aid Fair Housing Project	Services -- Fair Housing; Regional Organization	Housing Needs Assessment; Market Analysis; Other (Fair Housing)	This organization provides Fair Housing education and testing services and two members provided data regarding cases and testing in Cumberland County.
Reinvestment Partners	Services -- Fair Housing; Regional Organization	Housing Needs Assessment; Market Analysis; Other (Fair Housing)	This organization conducts Fair Lending testing throughout the U.S. They have not yet tested in Cumberland County.
United Management II	Housing Regional Organization Business Leaders	Housing Needs Assessment Market Analysis	This organization is a leading developer of low-income and affordable housing in the county.
US Housing and Urban Development	Services -- Fair Housing; Other government -- Federal	Housing Needs Assessment; Market Analysis; Other (Fair Housing)	HUD staff provided data regarding Fair Housing complaints and cases through a Freedom of Information Act request.

Table 1 – Agencies, groups, organizations who participated

Additionally, the following groups offered their insights via two different rounds of surveys.

Alliance Behavioral Health Care
Alms House Inc
Beatitude House
Better Health
The Care Clinic
CARE Family Violence Center

Carolina Collaborative Community Care
CCAP Inc, Headstart
Center for Economic Empowerment and Development
City Rescue Mission
Community Health Interventions and Sickle Cell Agency, Inc
Connections for Cumberland County
Cumberland County Council on Older Adults
Cumberland County Medication Access Program
Cumberland County Schools
Cumberland County Senior Community Service Employment Program
Cumberland HealthNET
Cumberland Interfaith Hospitality Network
Evergreen Behavioral Management
Family Endeavors
Fayetteville Area Habitat for Humanil
Fayetteville Metropolitan Housing Authority
Fayetteville Urban Ministry
Hope for our Homeless
Kingdom Community Development Center
Maple Ridge Apartments I and II
Myrover Reese Fellowship Homes
NAMI Cumberland, Harnett, and Lee Counties
Operation Inasmuch
Partnership for Children of Cumberland County
Services for the Blind
Sophia's Haven of Hope
St. Joseph of the Pines LIFE Center
Team Hope
United Way of Cumberland County
VFW Post 6018
YMCA of the Sandhills