

**Assessment of Fair Housing
City of Wilmington, North Carolina
October 4, 2016**



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I. Cover Sheet

1. Submission date: October 4, 2016

2. Submitter name: City of Wilmington, North Carolina

3. Type of submission: Joint Submission – City of Wilmington, NC & the Housing Authority of the City of Wilmington, North Carolina

4. Type of program participant(s): Consolidated Plan Participant & Public Housing Authority

5. For PHAs, Jurisdiction in which the program participant is located: City of Wilmington, NC

6. Submitter members (if applicable): City of Wilmington, NC & the Housing Authority of the City of Wilmington, North Carolina

7. Lead submitter contact information:

a. Name: Suzanne Rogers

b. Title: Community Development and Housing Planner

c. Department: Community Services Department/Community Development and Housing Section

d. Street address: 305 Chestnut Street

e. City: Wilmington

f. State: North Carolina

g. Zip code: 28402

8. Period covered by this assessment: Program Years 2017 – 2021

9. Initial, amended, or renewal AFH: Initial Assessment

10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;

11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable. All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature Page)

12. HUD Departmental acceptance or non-acceptance:

II. Executive Summary

Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

The City of Wilmington is the county seat and primary economic center of New Hanover County in the state of North Carolina. Wilmington is a port city located in the southeastern area of the state along the Atlantic coast. Wilmington enjoys a rich history. Incorporated in 1739 and becoming a city in 1866, it has remained an important City in the region. The City is governed by a non-partisan City Council consisting of a Mayor, Mayor Pro-Tem and five Council members with elections held every two years (Mayor serves two-year term and Council members serve staggered four-year terms).

The Housing Authority of the City of Wilmington, North Carolina (WHA) was organized and incorporated in 1938 as a body corporate and politic. It was the first housing authority established in the State of North Carolina. WHA was chartered by the City and its nine-member board of directors is appointed by the City of Wilmington's Mayor.

According to the most recent American Community Survey, in 2014 the population in Wilmington was 110,100. That represents a 45.2 percent population growth since the year 2000 – more than twice the statewide rate of 21.1 percent, helping to drive the overall growth in North Carolina. With this growth, understandably, comes an increased demand for housing. It is incumbent upon the City of Wilmington to understand how the demographic shifts underlying this population growth affect housing policy. The non-White population has remained relatively stable (27.26% in 1990 and 28.74% in 2010), but its composition has changed drastically. In 2000, the minority population in Wilmington was overwhelmingly Black (99.9%). By 2010, Hispanics accounted for over 20% of the City's non-White population. This shift will resonate in virtually every sector of the economy, including housing, and the City must align its housing policies and practices to ensure safe, decent, affordable housing is available for all its residents.

Affirmatively Furthering Fair Housing

Fair housing has long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem – but it was far from a solution. Since the passing of the Act community groups, private business, concerned citizens, and government agencies at all levels have

worked earnestly at battling housing discrimination. The Fair Housing Act mandates that the Department of Housing and Urban Development (HUD) ‘affirmatively further fair housing’ through its programs. Towards this end HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations. Until recently the Analysis of Impediments to Fair Housing Choice was the primary component of HUD’s fair housing efforts.

On July 16, 2015 HUD published its final rule on affirmatively furthering fair housing (AFFH). Three weeks earlier the U.S. Supreme Court upheld the distinct but related concept of disparate impact liability (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project*).

The procedural aspects of the rule are new, but the fundamental concept is not: the requirement to affirmatively further fair housing is a key provision of the Fair Housing Act, as codified in Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3608). As a condition of accepting HOME Investment Partnerships Program funding, Community Development Block Grants, McKinney-Vento Homeless Assistance Grants and public housing subsidies, agencies must undertake “meaningful actions... that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

The AFFH final rule replaces the existing requirement to conduct an analysis of impediments to fair housing (AI) with that of a new study, the Assessment of Fair Housing (AFH). The new AFH provides grantees with a uniform template, firmer guidance from HUD, and a host of data and mapping tools to assist them in their fair housing analysis.

The final rule states that a jurisdiction’s “meaningful actions” must:

- address significant disparities in housing needs and access to opportunity,
- replace segregation with truly integrated and balanced living patterns, and
- transform racially/ethnically concentrated areas of poverty into areas of opportunity.

There is no federal expectation for specific outcomes. Instead, agencies have to carefully and thoughtfully carry out the new process.

As a part of this new approach under the AFH, the City of Wilmington and the Wilmington Housing Authority will take a balanced approach to ensure these twelve goals are met for its residents (these goals are listed in no particular order):

- 1) Increase Affordable Housing Options
- 2) Maintain Existing Affordable Housing
- 3) Increase Local Housing Enforcement Efforts
- 4) Reduce Housing Discrimination Based on Disabilities
- 5) Expand & Improve Access to Funding Sources for Affordable Housing Development
- 6) Increase Homeownership Opportunities
- 7) Improve Educational Supportive Services
- 8) Improve Access to Employment Training Opportunities
- 9) Improve Access to Employment Opportunities
- 10) Improve Access to Public Transportation
- 11) Improve Public Perception of Affordable Housing
- 12) Improve Land Use & Planning Efforts

It is the goal of this new assessment to take the next step in community planning regarding fair housing issues in the City.

Methodology/Overview of Process

The Assessment of Fair Housing Tool is broken down into four parts:

- 1) The Community Participation Process
- 2) Assessment of Past Goals and Actions
- 3) Fair Housing Analysis, which includes a demographic summary, general issues, PHA analysis, disability access analysis and fair housing analysis
- 4) Fair Housing Goals and Priorities

Within these sections the Assessment consists of a comprehensive review of laws, regulations, policies and practices affecting housing affordability, accessibility, availability and choice within the City of Wilmington. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the City, with a particular focus on those that affect housing and special needs populations;
- Public and private organizations that impact housing issues in the City and their practices, policies, regulations and insights relative to fair housing choice;
- The range of impediments to fair housing choice that exist within both the urban center communities and other areas of the City;
- Specific recommendations and activities for the City to address any real or perceived impediments that exist; and
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice in the City.

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing need and related issues. The documents consulted include local comprehensive plans and ordinances, the Housing and Community Development Consolidated Plan for Wilmington, and other policy documents. Additional service provider data and observations were incorporated to include qualitative and quantitative information on special needs populations.

The primary data used in this assessment were HUD-provided data specifically for the AFH, and additional data were obtained from sources including Census reports, American Community Survey data, the Wilmington Housing Authority, GreatSchools, ACS/Census GIS maps via PolicyMap.

HUD provided data and maps are referenced as HUD Table and HUD Map and labeled with the corresponding number and title, and other supported data are labeled AFH Map, AFH Table and/or AFH Chart and can be found in the appendix along with the sources.

Fair Housing Issues

- 1) Segregation
- 2) Racial and Ethnic Concentrations of Poverty
- 3) Disparities in Access to Opportunity
- 4) Disproportionate Housing Needs
- 5) Publicly Supported Housing Location and Occupancy
- 6) Disability and Access Issues
- 7) Fair Housing Enforcement, Outreach Capacity and Resources

Significant Contributing Factors

- 1) Location and Type of Affordable Housing
- 2) Community Opposition (NIMBY-ism)
- 3) Displacement of Residents Due to Economic Pressure
- 4) Land Use & Zoning Laws
- 5) Occupancy Codes & Restrictions
- 6) Lending Discrimination
- 7) Private Discrimination
- 8) Deteriorated & Abandoned Properties
- 9) The Availability, Type, Frequency and Reliability of Public Transportation
- 10) The Location of Proficient Schools & Schools Assignment Policies
- 11) Impediments to Mobility
- 12) Lack of Public Investments in Specific Neighborhoods
- 13) Lack of Affordable, Integrated Housing for Individuals Who Needs Supportive Services
- 14) Access to Publicly Supported Affordable Housing for Persons with Disabilities
- 15) Lack of Assistance for Housing Accessibility Modification
- 16) Lack of Local, Private Fair Housing Outreach & Enforcement
- 17) Lack of Local, Public Fair Housing Enforcement
- 18) Lack of Resources for Fair Housing Agencies & Organizations

Goals

- 1) Increase Affordable Housing Options
- 2) Maintain Existing Affordable Housing
- 3) Increase Local Housing Enforcement Efforts
- 4) Reduce Housing Discrimination Based on Disabilities
- 5) Expand & Improve Access to Funding Sources for Affordable Housing Development
- 6) Increase Homeownership Opportunities
- 7) Improve Educational Supportive Services
- 8) Improve Access to Employment Training Opportunities

- 9) Improve Access to Employment Opportunities
- 10) Improve Access to Public Transportation
- 11) Improve Public Perception of Affordable Housing
- 12) Improve Land Use & Planning Efforts

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

In order to gather the greatest number of viewpoints about issues affecting the community the City of Wilmington conducted a public housing affordability survey, held several meetings with the public and community leaders, and worked with the PHA Resident Advisory Board. The city worked with local organizations to advertise the events and survey, sent out several press releases, and provided a translator at public meetings to assist anyone with limited English proficiency.

Housing Affordability Survey:

Between July 18, 2016 and August 22, 2016, a Fair Housing Survey was conducted in Wilmington to obtain feedback from the public about housing issues within the city. There were a total of 189 responses to the online survey.

Hearings and Meetings:

Cape Fear Housing Coalition – On June 9, 2016, the CFHC held a meeting with community leaders to discuss furthering fair housing in Wilmington. The issues discussed included segregation, school enrollment policies and economic opportunities, and R/ECAPs.

Disability Resource Center – On June 22, 2016, city officials met with the leadership of the Disability Resource Center to discuss housing issues facing members of the community who are disabled.

Tri-County Homeless Initiatives Coalition – On July 11, 2016, leadership met to discuss addressing homeless issues within Wilmington. The primary issues discussed were segregation, citizens with disabilities, school proficiency, public policy and lack of land development.

Community Affairs Committee – On July 13, 2016, a public meeting was held to discuss segregation, cost burden in the city and housing choice for the disabled.

City of Wilmington Public Hearing - On September 20, 2016 a public hearing was held for public comments on the Wilmington AFH. All comments were accepted and a video recording was taken and published online. Following the Public Hearing, City Council passed a resolution endorsing and approving the submission of the AFH. The resolution, and comments as well as a link to the video are included in the appendix.

Assessment of Fair Housing 30 Day Public Comment Period:

Wilmington made the City's Assessment of Fair Housing available to the public from September 2, 2016 to October 2, 2016. No comments were received by the public.

Wilmington Housing Authority:

On August 3, 2016 the WHA met with the Resident Advisory Board at Creekwood Community Center. The Board of Directors for the Wilmington Housing Authority passed a resolution endorsing the AFH on September 26th, 2016. The resolution is included in the appendix.

2. Provide a list of organizations consulted during the community participation process.

City of Wilmington

Wilmington Housing Authority

Blue Ribbon Commission

Cape Fear Housing Coalition

Cape Fear Community Land Trust

Cape Fear Council of Governments

Disabled Resource Center

GreatSchools via PolicyMap

New Hanover County School District

PolicyLink

Tri County Homeless Initiatives Coalition

Trillium Health Resources

UNC Wilmington

Wave Transit

Wilmington Housing Authority – Resident Advisory Board

Wilmington Regional Association of Realtors Community Advocacy Committee

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

Efforts to elicit meaningful community participation were acceptable. There was sufficient input from a diverse group of citizens and community leaders.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Fair Housing Survey – The Fair Housing Survey collected a total of 189 responses. Despite the diverse socio-economic status and race/ethnicity of the participants there were some common themes throughout the results. What follows is a summary of important data metrics and common comments. A complete copy of survey results and comments can be found in the appendix.

- 74% of participants believe discrimination in Fair Housing exists in Wilmington and 32% of participants believe discrimination happens often.
- The most common type of housing discrimination perceived in Wilmington is discrimination based on race.
- 25% of respondents have faced housing discrimination personally, and that discrimination is three times more likely in the rental market than the home ownership market.
- Rising rents is the most common reason for someone being displaced for economic reasons.

- 87% of the respondents do not believe there is adequate housing for the disabled in Wilmington.
- Affordable housing is needed in more areas of the city, particularly for the elderly and disabled.
- Housing costs are increasing in the city while wages are more stagnant.
- New housing developments seem to focus on students and higher income residents.
- Public housing policies regarding eviction need to be evaluated.
- Middle range housing is not available in the city.
- Fair housing education is needed.

Hearings and Meetings:

Cape Fear Housing Coalition – The following is a summary of the important points that arose from the Cape Fear Housing Coalition meeting on June 9. A full list of comments is available in the appendix.

- Segregation
 - o It is primarily an issue of income, but Black individuals tend to have lower incomes.
 - o Retirees are putting economic pressure on the city by concentrating poverty into more areas.
 - o Many people believe that the elected officials are not interested in properly addressing this issue.
- School Enrollment Policies and Economic Opportunities
 - o School-provided transportation is inadequate.
 - o Public transportation options are inadequate, particularly for service industry employees.
 - o Sidewalks and bike paths should be included in neighborhood plans.
- R/ECAPs
 - o Security deposits and bad credit are barriers to housing.
 - o Substandard housing is the only affordable housing opportunity.

Disability Resource Center – Addressing the needs of people with disabilities is important for the City of Wilmington. According to the Disability Resource Center, 75% of its clients have housing needs and there are not enough housing units available throughout the city to meet the needs. Transportation has become a major problem for disabled individuals and many senior housing developments lack handicapped parking for elderly residents who still drive. A full list of comments from this meeting is in the appendix.

Tri-County Homeless Initiatives Coalition – There were many common issues that arose during the meeting with TriHIC, which are summarized below. A complete list of responses is available in the index.

- Housing is not affordable in Wilmington and loans are not available for those who need it.
- High quality schools are often in expensive school districts, putting them out of reach for many residents.
- “Not In My Backyard” (NIMBY) is an issue when it comes to developing affordable housing.

Community Affairs Committee – A thorough discussion was held by the Wilmington Regional Association of Realtor’s Community Affairs Committee to discuss a variety of important issues that Wilmington faces. Segregation is still seen as a problem, which is due to a complex web of issues including school proficiency, lack of support systems, income inequality, historical institutional racism, and public housing location. Many families are cost burdened due to the increase in rents and the lack of affordable housing in the city. See the appendix for a complete list of comments and issues discussed.

Wilmington Housing Authority – A Resident Advisory Board meeting was held for consultation and input on the City of Wilmington/WHA AFH. The following comments are a summary of what was discussed. Complete comments are available in the appendix.

- Senior housing is an issue within the city and there are not enough senior housing projects.
- Housing affordability is a major issue, particularly for young people and families.
- The quality of some public housing facilities needs to be improved.
- Public transportation needs to be improved in both frequency and location.
- Educational facilities in the region need to be improved and experienced, high-quality teachers are needed.
- Job training programs are needed.
- Grocery stores and other amenities are difficult to access from some low-income neighborhoods.
- Better communication with residents is needed about available programs within the city.
- Public housing feels separate and disconnected from the rest of Wilmington.

IV. Assessment of Past Goals, Actions and Strategies

Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

The Regional Analysis of Impediments to Fair Housing Choice for the Lower Cape Fear Region, dated April 20, 2015, identified the following impediments and goals to address each impediment:

1. Fair housing education and outreach
 - a. GOAL: Improve the public's knowledge and awareness of the Federal Fair Housing Act and related laws, regulations and requirements to affirmatively further fair housing.
2. Public policies and regulations
 - a. GOAL: The City of Wilmington; the Counties of Brunswick, New Hanover, and Pender; and other municipalities in the Region should make revisions to their Unified Development Ordinances and Zoning Codes
3. Need for affordable rental housing units
 - a. GOAL: Promote and encourage the construction and development of additional affordable rental housing units in the area, especially for households whose income is less than 80% of the median income
4. Need for affordable housing for sale
 - a. GOAL: Promote and encourage the development of for-sale single-family homes that are affordable to low- and moderate-income households
5. Need for accessible housing
 - a. GOAL: Increase the number of accessible housing units that are decent, safe and affordable to lower-income disabled persons throughout the region.
6. Private lending and insurance practices
 - a. GOAL: Approval rates for all originated home mortgage loans and insurance coverage should be fair, risk-based, unbiased and impartial regardless of race, familial status and location.
7. Regional approach to affirmatively further fair housing
 - a. GOAL: Provide housing and economic opportunities for low- and moderate-income persons, and also for the federally recognized protected classes, to live and work throughout the Cape Fear Region
8. There is a lack of financial resources

- a. GOAL: Increased federal funding for the CDBG and HOME Programs to pre-FY 2010 budget levels, which will allow entitlement communities to better achieve their housing and community development goals. Encourage increased funding on the state and local level for housing and community development projects.

a. Discuss what progress has been made toward their achievement;

Wilmington Housing Authority (WHA) has taken several actions to achieve the aforementioned goals. WHA is distributing literature and working to inform residents on how to file a complaint, reaching out to the staff of local lending institutions to educate them about the needs of the low- and moderate-income residents of Wilmington, and has met with the local transit authority to request additional bus routes. WHA has developed affordable apartments and single-family homes and is constructing 8 units of Supportive Housing for disabled individuals, has increased its public housing inventory, and has received additional Housing Choice Vouchers (Section 8). WHA plans to request additional Section 8 Vouchers as available from HUD and continues to seek opportunities for the provision of affordable housing. Lastly, WHA has developed unsubsidized low income housing tax credit communities (LIHTC) with a total of 144 units.

The City of Wilmington's 2016-2017 Annual Action Plan outlines further progress towards the goals of increasing the number of affordable rental units and affordable housing for sale. According to this plan, several multi-family projects will be completed in FY 2016-2017, including 8 units in Pearce House and 16 units in Lakeside Reserve. The City will also continue to fund the rehabilitation of Willow Pond, a 40-unit affordable family project, and will continue to support both the Cape Fear Regional Community Development Corporation and the AMEZ Housing Community Development Corporation's acquisition, development, and rehabilitation of low-income housing.

In order to facilitate increased homeownership among the low-income population, the City will continue existing formal and informal working relationships with several non-profit housing organizations in the area. The City provided the Cape Fear Community Land Trust with HOME funds for the purchase of land on which to develop 8 units at Gideon Point, and conveyed a house and loan for rehabilitation. Cape Fear Habitat for Humanity constructs approximately 12 houses per year for families earning 30-60 percent AMI, and the City seeks to provide the organization with City-owned foreclosed properties. In addition, the City continues its Home Ownership Program (HOP) to provide zero-interest, second mortgages for eligible households.

City staff will continue to identify models from other communities, working in collaboration, when appropriate, with stakeholders representing affordable housing providers, homebuilders, developers and other community housing advocates to foster support for implementing these best practices through local policy changes.

There are several other ways in which the City staff is continuing its effort to reach its goals:

- Developing strategies to promote the City’s voluntary density bonus program
- Encouraging area banks and real estate professionals to participate in affordable housing initiatives offered by the City and other organizations
- Seeking opportunities to leverage resources to increase the funds available for the development of affordable housing within the city, especially using LIHTC
- Offering real estate professional education and home buying classes, which include information on credit, budgeting and fair housing laws
- Maintaining a fair housing website
- Producing and distributing brochures, flyers and other material through the community and at community events
- Sponsoring, in partnership with the Cape Fear Housing Coalition and New Hanover County, a Fair Housing Workshop for community-based organizations and other key stakeholders

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and

As a member of the Cape Fear Housing Coalition, the City is co-sponsor of a “Solution Series” which consists of workshops focusing on a best practice for affordable housing development. Speakers from other jurisdictions, including community activists, are invited to share details about policies/programs as implemented and the process for developing.

City staff met with representatives from brokers and banks to encourage participation in the home ownership program, including TD Bank, New Bridge, First Citizens and South Bank. Additionally, the Realtors’ Association sponsored the Mayor’s Roundtable on Housing Affordability.

City Council formed a joint committee with New Hanover County to explore best practices and make recommendations for policy action to increased funds available for affordable housing and leverage private development resources.

The City offered 10 homebuyer education classes to 103 participants in FY16 and two real estate professional education classes, one in November and another in April, to a total of 10 brokers combined.

The City currently maintains the Fair Housing website within the City's website page and produces brochures and other documents to distribute at events and other opportunities.

Community Development staff have not been involved in promoting the voluntary density bonus program and will need to coordinate with Planning staff. The program as currently designed does not offer enough incentive to motivate developers to participate.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

Past plans do not address either the geographic location of where affordable units are lacking or the demographics of the occupants. As such, they do not address important AFFH measures such as R/ECAPS or dissimilarity indices. Without specifying locations or beneficiaries, these solutions do not necessarily affirmatively further fair housing. For example, where in the community is there a need for more affordable housing, and how should the funding sources and owners inform those least likely to apply know about the opportunities?

Wilmington Housing Authority has used private bank financing and tax-exempt bonds previously for the preservation of affordable housing. WHA is willing to strategically partner with private developers using bonds. With regard to creating local enforcement capacity, there appears to be an unstated assumption that doing so is not possible.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Both the City and Housing Authority have been successful in adding and maintaining/rehabilitating affordable housing, which provides encouragement for future efforts. However, as is the case with most jurisdictions across the country, the need for affordable housing continues to greatly exceed the level of activity. As such, these are the top

two priorities. Other goals also will contribute towards accomplishing these objectives, including increased funding.

Improving land use and planning efforts is necessary in part because the past goal of coordinated inclusionary housing has not been accomplished. To date, no market-rate developer has taken advantage of the city's voluntary density program. Past plans have not addressed the need to rehabilitate abandoned properties. Considering the extent to which land is already utilized within the city limits, redevelopment will be crucial moving forward.

The program participants have engaged in education about individuals' fair housing, but there is a clear need for a local enforcement presence. Leaving the task to distant federal or state officials and overworked Legal Aid attorneys does not provide residents with sufficient recourse to protect their rights.

Last but not least is the continued presence of R/ECAPs. These areas have persisted over several decades, which indicates the need to both improve conditions for residents and strategically create affordable housing opportunities elsewhere. The former can be addressed by improved transit, school supportive services, and job training. The latter will result from increased development.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990)

Racial/Ethnic Populations

HUD Table 1 - Demographics breaks down the population of Wilmington and the region by race and ethnicity. In Wilmington the White, Non-Hispanic population is the majority with 71.26 percent, which is slightly lower than the regional White, Non-Hispanic population of 76.19 percent. The Black, Non-Hispanic population is the second largest racial demographic in Wilmington with 19.24 percent of the population. The regional Black, Non-Hispanic population rate is slightly smaller at 15.17 percent. The Hispanic population makes up 6.02 percent of Wilmington's population but makes up 5.46 percent of the regional population. Asian or Pacific Islanders, Native Americans, and individuals who identify as Other all make up very small

segments of the population in both the city and the region. (Source: Decennial Census, 2010)

Racial and Ethnic population trends are shown in HUD Table 2 - Demographic Trends for both Wilmington and the region as a whole. Since 1990 there has been a demographic shift in Wilmington, particularly among the minority populations. The White population in Wilmington has stayed relatively stable, shifting only from 72.74 percent in 1990 to 71.26 percent in 2010. The Black population, on the other hand, has decreased from 25.51 percent to 19.24 percent while the Hispanic population has increased from 0.81 percent to 6.02 percent between 1990 and 2010. The proportion of the Asian or Pacific Islander population has more than doubled from 0.51 percent to 1.24 percent but the population size is still relatively small with only 1,355 people falling into this demographic.

The region as a whole has seen a similar population shift between 1990 and 2010. The White population has grown in raw numbers from 113,982 to 194,199, but due to the overall population growth in the region the proportion of the population that identifies as White has remained stable from 76.41 percent to 76.19 percent. The region has seen a decrease in the relative Black population from 21.92 percent to 15.17 percent and an increase in the relative Hispanic population from 0.78 percent to 5.46 percent. Asian or Pacific Islander and Native American populations in the region mirror the slight growth that is seen in Wilmington. (Source: Brown Longitudinal Tract Database based on Decennial Census 2000 and Decennial Census 1990)

National Origin Populations

HUD Table 1 – Demographics also shows the national origins for the population of Wilmington and the region as a whole. The most common national origin in Wilmington is Mexico with 2.19 percent of the population. The region has the same most common national origin, Mexico with 1.98 percent. Honduras is the second most common national origin in Wilmington with 0.69 percent, as well as the region with 0.38 percent. Out of the top ten countries of origin, Wilmington and the region as a whole share nine (Mexico, Honduras, Canada, Germany, China, El Salvador, England, India, and Vietnam) and they are in relatively the same order. The Country of Origin that is unique to Wilmington is Burma (#9) and the Country of Origin unique to the region as a whole is Other UK (#10). (Source: Decennial Census, 2010)

HUD Table 2 - Demographic Trends also shows trends in the foreign-born population in Wilmington and the region as a whole. The Foreign-born population in Wilmington has steadily increased since 1990 from 1,250 to 6,907, representing a nearly four-fold increase in the population percentage (from 1.66% to 6.48%). The region has seen similar growth in its foreign-born population. The population has increased from 2,134 to 13,623 – an increase from 1.43 percent to 5.34 percent of the population. (Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990)

Limited English Proficiencies

Spanish is the most common language for individuals with Limited English Proficiencies (LEP) in both Wilmington and the region. The rate of LEP for Spanish speakers in Wilmington (3.47%) is slightly higher than the region (2.63%). The second most common primary language classification for LEP individuals in Wilmington is Other Asian Language and only makes up 0.21% of the population. The third most common primary language for LED individuals in Wilmington is Chinese with 0.16%. (Source: HUD Table 1 – Demographics, Decennial Census, 2010)

HUD Table 2 - Demographic Trends shows the trends in the population with Limited English Proficiency. Growth in the population of foreign-born individuals leads to an increase in the number of people who have LEP. In Wilmington, the LEP population has increased from 891 to 4,427 between 1990 and 2010, which is an increase from 1.18 percent of the population to 4.15 percent. The region as a whole has a lower proportion of their population that has LEP. In 1990, there were 1,642 individuals with LEP in the region (1.10%). That figure increased to 8,199 (3.22%) in 2010. (Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990)

Individuals with Disabilities by Disability Type

Wilmington and the region as a whole have similar rates of disability across all categories. The most common disability is Ambulatory Difficulty, which affects 7.5 percent of the Wilmington population and 7.83 percent of the regional population. The second most common disability is Cognitive Difficulty, which affects 5.16 percent of the population in Wilmington and 4.93 percent of the regional population. (Source: HUD Table 13 - Disability by Type, Decennial

Census 2010)

Families with Children

In Wilmington, 10,293 families have children, which is 41.66 percent of all families. The demographics in the region as a whole are very similar: 26,657 families (41.30%) have children. (Source: HUD Table 1 – Demographics, Decennial Census 2010)

Between 1990 and 2010 there was a small decrease in the proportion of families with children in Wilmington and the region as a whole. In Wilmington in 1990, 42.96 percent of families had children and in 2010 it decreased slightly to 41.66 percent. In the region as a whole in 1990, 43.39 percent of the families had children, and in 2010 that figure dropped to 41.30 percent. (Source: HUD Table 2 – Demographic Trends, Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990)

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The following two maps show the distribution of housing in Wilmington and the surrounding area. AFH Map 1: Owner-Occupied Housing, shows the percentage of Owner-Occupied Housing in the area, and AFH Map 2: Renter Occupied Housing shows the percentage of Renter-Occupied Housing.

AFH Map 1: Owner-Occupied Housing (See Appendix)

In the lightest shaded areas of this map, less than 20% of housing is owner-occupied. Central Wilmington has considerably lower rates of owner-occupied housing than most of the surrounding areas.

AFH Map 2: Renter Occupied Housing (See Appendix)

AFH Table 1 - Percent of Housing Occupied by Renters and Owners and AFH Charts 1 & 2 show the rate of owner-occupied and renter-occupied housing in Wilmington and New Hanover County over time. Between 2000 and 2014, the rates of homeownership have changed more dramatically in New Hanover than in Wilmington. In Wilmington, renter-occupied housing has increased by 3.5 percent and owner-occupied housing decreased by 3.5 percent. In New Hanover County, renter-occupied housing increased by 7 percent between 2000 and 2010,

while owner-occupied housing decreased by 7 percent.

AFH Table 1 - Percent of Housing Occupied by Renters and Owners (See Appendix)

Wilmington has a higher proportion of renters than New Hanover County as a whole. In 2014, renter-occupied units accounted for 54.9 percent of all housing in Wilmington and 42.4 percent in New Hanover County. (Source: 2000 Census, 2010 ACS 5-Year Estimates, 2014 ACS 5-Year Estimates)

AFH Chart 1 – Percent Renter Occupied Housing (See Appendix)

Wilmington has proportionally fewer homeowners than New Hanover County as a whole, and that number is decreasing. Owner-occupied units accounted for 48.6 percent of all housing in Wilmington in 2000, and 45.1 percent by 2014. The rising cost of homeownership may be pushing some low-income individuals and families out of their homes and into less stable rental housing. (Source: 2000 Census, 2010 ACS 5-Year Estimates, 2014 ACS 5-Year Estimates)

AFH Chart 2 – Percent Owner Occupied Housing (See Appendix)

B. General Issues

1. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

HUD Table 3 - Racial/Ethnic Dissimilarity Trends, shows the racial and ethnic dissimilarity trends in Wilmington and the region as a whole. According to HUD, “[t]his dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation between the two groups measured. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.”

As of 2010, Wilmington and the region both have moderate segregation between Non-White and White populations. Wilmington has high segregation between Black and White populations, and the region at large has moderate segregation between the same groups. There is low segregation between Hispanic and White, and Asian or Pacific Islander and White in Wilmington and the region as a whole. The highest level of segregation is between Black and White populations in both areas.

b. Explain how these segregation levels have changed over time (since 1990).

Since 1990, levels of segregation have decreased between Non-White and White populations in Wilmington and the region. Wilmington saw a drop of over 8 points and moved from the “high segregation” to “moderate segregation” label between 1990 and 2010. Levels of segregation have increased between Hispanic and White populations in both Wilmington and the region, both of which are close to moving from “low segregation” to “moderate segregation.” Segregation levels between Asian or Pacific Islander and White populations have decreased slightly in Wilmington and the region as a whole since 1990. Within the city of Wilmington the level of segregation between Black and White remains high, although there has been a small reduction in the dissimilarity index since 1990. (Source: HUD Table 3 - Racial/Ethnic Dissimilarity Trends)

c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

HUD Maps 1-3 show the density of different groups within Wilmington and the region as a whole. HUD Map 1 shows the density of different racial or ethnic groups in 2010, HUD Map 2 shows the trends in density of different racial or ethnic groups in 2000, and HUD Map 3 shows the density of groups based on their country of origin.

Within Wilmington, the northwest area of the city has a significantly higher Black population density than the rest of the city. This is particularly true in the neighborhoods of Crescent Heights, Greenwood, Jervay Place, Northside, and Clarendon Park. The Northside, Love Grove, and South Side neighborhoods, in particular, stand out because they include two areas that have been identified as a “racially or ethnically-concentrated area of poverty” (R/ECAP). The areas with high minority segregation in the region are almost all concentrated in Wilmington, as much of the outer region is primarily White.

There are no areas that have a particularly high concentration of people with the same national origin, but individuals with a foreign national origin do tend to live in the central east and southern areas of the city.

(Source: HUD Map 1: Racial/Ethnicity Density (2010), HUD Map 2: Racial/Ethnicity Density Trends (2000), HUD Map 3: National Origin Density).

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Highly segregated areas contain primarily renter-occupied housing, but not to such a degree as to stand out from the rest of the city. There is not a disproportionate amount of renter- or owner-occupied housing in segregated areas.

e. Discuss how patterns of segregation have changed over time (since 1990).

Over time, the areas of segregation appear to have decreased, though there are still R/ECAP census tracts within the city. During the last two decades the segregation between the White and non-White population has also decreased from a Dissimilarity Index value of 57.81 in 1990 to 49.04 in 2010, indicating a shift from high segregation in 1990 to moderate segregation in 2010. However, there is still a high level of segregation between Wilmington’s Black and White populations: the index was 61.57 in 1990 and 59.40 in 2010.

f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

Looking at the HUD-provided data the demographic trends in Wilmington do not appear to be encouraging greater segregation in the future. The White and Non-White distribution has remained relatively stable since 1990. Since 1990, the Black population has grown at a slower rate than the other racial groups in Wilmington. Between 1990 and 2010, the Black population grew from 19,226 to 21,056, which represents a growth rate of 9.5 percent. The White population had a growth rate of 42.3 percent – with the population growing from 54,821 to 77,998. The Hispanic population ballooned by 986 percent in the past two decades, from a population of 607 to 6,592. The Black population went from making up over 25% of the population of Wilmington in 1990 to less than 20% in 2010, while the Hispanic population grew from less than 1% of the total population to over 6% in the same time period.

Historically, racial segregation has been between Black and White populations in Wilmington, but according to the Dissimilarity Index, the segregation between these populations is decreasing slightly. The overall segregation between all White and Non-White populations declined between 1990 and 2010, but as the Hispanic population has grown the Dissimilarity Index between White and Hispanic populations has started to increase.

The location of public housing and discriminatory housing are two practices or policies that can further segregation in Wilmington. If public housing is located in racially segregated areas and is primarily available to individuals of that race due to economic disparities this will reinforce segregation. Local jurisdictions generally have control over where public housing is placed within the city and often higher-income families (who are also often White) have a “Not In My Backyard” (NIMBY) view of public housing. It is important that housing assistance is available in all census tracts to provide opportunities outside of segregated areas of the city. The city recognizes this need and is working to correct past policies that will not be continued, new public housing locations are distributed in a variety of areas in the city to encourage integration.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

In 2015, PolicyLink conducted a study on the region. The Equitable Growth Profile of the Cape Fear Region found a demographic shift that could increase segregation in the region. In the last several decades there has been an influx of predominantly White retirees into the area. In 1980, 25 percent of seniors were Non-White, but by 2013 that percentage has been cut nearly in half to 13 percent. This shift could cause areas with large amounts of retirees to become segregated as wealthy people move into the area and push out lower income families that may be disproportionately Non-White. This runs somewhat contrary to the HUD-provided data but provides a more balanced look at Wilmington.

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

The 2015 Cape Fear Analysis of Impediments identified segregation as an issue worth addressing within the region. The analysis found considerable segregation along racial lines, particularly in R/ECAP districts, through analyzing a variety of measures including: segregation of affluence, ratio of similar race/ethnicity of neighbors, the relation between race and income, indices of exposure, isolation index, and dissimilarity index. While Wilmington did not adopt this document, the research does provide insight into the region. The City of Wilmington will be making recommendations as part of this AFH.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- **Location and type of affordable housing**
- **Community Opposition**
- **Displacement of residents due to economic pressures**
- **Land use and zoning laws**
- **Occupancy codes and restrictions**
- **Lending Discrimination**

Community Opposition to integration is a difficult thing to accurately judge. There are often stereotypes that low-income residents will bring down the property value of the neighborhood and may attract crime. Low-income residents often lack a voice in policy discussions. Even when communities recognize the need for public housing and publicly subsidized housing, like LIHTC, throughout the city there can be a “Not In My Backyard” (NIMBY) view of public housing. A recent survey of New Hanover County by UNC Wilmington found that 52 percent of respondents believed the presence of public housing would lower their property value and nearly 35 percent said it would increase crime.

Rising housing costs can lead to **displacement of residents due to economic pressures**. As the costs of housing rises it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity, as it is in some areas of Wilmington, this can lead to racial segregation. Low-income residents gather together along racial lines and are priced out of more affluent areas. Many homeowners in affluent neighborhoods voiced concern about the presence of public housing in their neighborhoods, their comments are available in the Appendix.

Location and type of affordable housing can have a major impact on segregation within a community. Public Housing, some Section 8 housing, and some Low Income Tax Credits are concentrated in regions with higher levels of racial segregation, including R/ECAP tracts.

2. R/ECAPs

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

Wilmington has two groupings of R/ECAP tracts within the jurisdiction. Census Tract 37129011100 is a R/ECAP in the downtown area, and Census Tracts 37129010100 and 37129011400 form a R/ECAP in the northwest corner of Wilmington.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

HUD Table 4 - R/ECAP Demographics, displays the population of the R/ECAPs based on race and ethnicity. In the city as a whole 71.26 percent of the population is White, but in the R/ECAPs only 17.33 percent of the population is White. The R/ECAP is disproportionately (76.89%) Black. The city of Wilmington includes every R/ECAP in the region. (Source: Decennial Census 2010)

HUD Table 4 - R/ECAP Demographics, also displays the population of the R/ECAPs based on families and families with children. The percent of families with children is slightly higher in the R/ECAPs than in the City as a whole. 41.66 percent of families in Wilmington have children, but in the R/ECAPs 44.80 percent of families have children.

c. Describe how R/ECAPs have changed over time (since 1990).

The R/ECAPs in Wilmington have undergone minor fluctuations depending on the year. In 1990, Census Tracts 37129011400 and 37129011100 were R/ECAPs. In 2000, 37129011100 (also known as Southside) was no longer a R/ECAP but 37129010100 was added. In 2010, all three (37129011400, 3719011100, and 37129010100) were considered R/ECAPs. The Southside, which is Census Tract 37129011100, is the site of the former Jervey Place public housing development, which was redeveloped as a HOPE VI project. Due to the redevelopment the residents of Jervey Place were temporarily relocated. This likely accounts for the change in R/ECAP in the 2000 census data. At the time of the 2010 census, the HOPE VI project was complete and occupied.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

The 2010-2014 American Community Survey 5-Year Estimates provide a more updated view of poverty and segregation in Wilmington. AFH Map 3 and AFH Map 4 visually display poverty in the city by race. AFH Map 3 is the percentage of Black individuals in poverty within each census tract, and the AFH Map 4 is the percentage of White individuals in poverty within each census tract.

AFH Map 3: Percent of Blacks in Poverty (See Appendix)

The same scale is used in both maps, and it is clear that there are more census tracts with high rates of poverty for Black individuals than White individuals. There are five census tracts where the Black poverty rate is over 50% but zero census tracts where the White population has a poverty rate that high.

AFH Map 4: Percent of Whites in Poverty (See Appendix)

Poverty is also disproportionate within Census tracts. AFH Table 2: Poverty Rate and Difference in R/ECAP Tracts by Race displays the poverty rates by race for the R/ECAP Census tracts. Even when White individuals live in impoverished areas, they have a lower rate of poverty than Black individuals. The R/ECAP tract with the greatest difference between White and Black poverty is 37129010100, located to the north of Highway 17.

AFH Table 2: Poverty Rate and Difference in R/ECAP Tracts by Race (See Appendix)

The location of public housing can have a strong impact on continuing segregation and R/ECAP census tracts. AFH Map 5 displays the percentage of households in each census tract that lives in subsidized housing. Throughout most of the city less than 15% of the housing is subsidized, but in the R/ECAP and surrounding areas 30% or more of the housing is subsidized.

AFH Map 5: Percent of Total Households Living in Subsidized Housing (See Appendix)

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

According to HUD provided maps, reinvestments in Wilmington's R/ECAPs include six public housing projects, which account for 50% of the public housing units in the city. According to the 2016 Wilmington Action Plan, Rankin Terrace is currently undergoing the renovation of 77 units, the construction of a new community center. There are also 8 units of supportive housing in the Southside under construction and WHA is seeking smaller apartment communities to purchase and integrate into the wider community with a smaller footprint.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- **Location and type of affordable housing**
- **Community Opposition**
- **Displacement of residents due to economic pressures**
- **Private discrimination**
- **Deteriorated and abandoned properties**

The factors that continue to contribute to R/ECAPs are similar to those stated above that contribute to segregation, though the economic pressure may be even greater.

Public meetings have found perceived ***Community Opposition*** to the expansion of Public Housing into new areas, which would help alleviate the segregation found in R/ECAPs. The ***location and type of affordable housing*** available outside of the R/ECAPs limits the opportunities for integration in the city. This is an issue that the city is aware of and is dedicated to correcting.

Wilmington is a growing city and there is a high potential for the ***displacement of residents due to economic pressures*** out of neighborhoods and into R/ECAPs. Not only are retirees moving into the city, the presence of a large major state university (University of North Carolina –

Wilmington) puts upward pressure on housing costs, particularly in the short term before additional housing can be built. Approximately 70% of the students at UNC-Wilmington live off campus and compete for housing with local residents. Students, due to access to co-signers, disposable income, and general lack of dependents are often directly competing with low-income residents. This housing pressure from students is likely to continue for several years. According to UNC-Wilmington projections the total enrollment at the school will increase 1.5%-2% each year, but new on-campus housing will not be available to cover most of those students.

Private discrimination in housing is illegal, but still happens throughout the country.

3. Disparities in Access to Opportunity

1. Analysis

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity shows the opportunity indicators by race/ethnicity in Wilmington and the region as a whole, as well as by total population and population below federal poverty line. According to HUD, a “higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).”

a. Educational Opportunities

i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity shows the School Proficiency Index in the region. The index measures the proficiency of elementary schools and is determined by the performance of 4th graders. White and Asian or Pacific Islanders have similarly high index scores of 50.08 and 53.12, respectively. Hispanic and Native American populations score approximately 10 points lower on the index with 43.82 and 40.31, respectively. The index of Wilmington’s Black population, 25.35, is significantly lower than any other racial or ethnic demographic.

The population below the poverty line scores lower on the School Proficiency Index than those above the poverty line. The White, Black, and Native American populations below the poverty level score between 5 and 15 points lower than those above the poverty line. The Hispanic population has less variation between those below the poverty level and those above it, with those below it scoring 40.12, the highest score for all populations below the poverty line. The Asian or Pacific Islander population had the sharpest decline for the population below the poverty level, from 53.12 to 20.87.

HUD Map 9 - Racial/Ethnicity and School Proficiency, displays the school proficiency index paired with different demographics. Darker grey areas are tracts that have higher school proficiency scores. The maps show school proficiency and racial/ethnic demographics, and school proficiency and households with children.

School proficiency is significantly lower in downtown Wilmington, particularly in R/ECAP

regions, than the rest of the region. Census tracts closer to the coast and in the suburbs have a higher level of school proficiency. While census tracts do not fit well with school boundaries, it appears that Rachel Freeman, Snipes, and Sunset Park Elementary schools cover much of the R/ECAP tracts and the area to the northwest.

(Source: HUD Map 9 - Families with Children and School Proficiency)

ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Based on HUD Table 12 - Opportunity Indicators, by Race/Ethnicity, the school proficiency index shows the Black, non-Hispanic population has considerably less access to proficient schools. All racial groups have an index score between 40 and 50, but the Black population has a proficient school index of 25. Families living in R/ECAPs and closer to the northwest side of town have considerably less access to proficient schools, and these areas also have the highest levels of segregation.

When we look at the population that is below the federal poverty line, the School Proficiency Index drops to varying degrees for all racial and ethnic groups. The Black population still has the lowest access to proficient schools with a score of 19.4, but the Asian or Pacific Islander population is close with a score of 20.87. The White population has a significant 15-point drop to 34.49, and the Hispanic and Native American populations both dropped approximately 5 points. These data indicate that low-income families have reduced access to quality education, which can continue the cycle of poverty. This is particularly true for minority populations, especially Black families.

iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

In Wilmington, a Black, non-Hispanic student's ability to attend a proficient school is considerably less than students from other racial or ethnic groups. This is particularly true for students below the federal poverty level. It has been known for many years that there is performance gap in the county between White and Non-White students. In 2013, 85 percent of White students successfully passed the math and reading tests at the end of the year and only 45 percent of Black students passed. This gap of 40 percentage points is 10 percent higher than it was in 2003. The causes of poor performance in school are a complex mixture of income,

family support, and access to proficient schools. Wilmington's neighborhood school policies may be contributing to poverty and limited opportunities by segregating students along economic and racial lines.

b. Employment Opportunities

i. Describe any disparities in access to jobs and labor markets by protected class groups.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity also displays the Labor Market Index and the Jobs Proximity Index. The Labor Market Index is a measure of unemployment rate, labor-force participation rate, and percent of the population (over 25 years old) with at least a Bachelor's degree. The Job Proximity Index measures the physical distance between where someone lives and their job, based on race. These two indices, combined with HUD Map 10 - Job Proximity and Race/Ethnicity and Map 11 - Labor Market and Race/Ethnicity, show employment opportunity disparities in the region. HUD Map 10 shows the racial demographics and proximity to jobs. HUD Map 11 shows labor engagement and racial demographics.

The Jobs Proximity Index in the city is more consistent across racial groups than the Labor Market Index. The highest score is the Hispanic population with a score of 64.97, while the lowest score is the Asian or Pacific Islander population with a score of 53.36. For populations below the poverty line the Jobs Proximity Index is very similar to those above the poverty line in Wilmington. In fact, for the White and Asian or Pacific Islander population the score increases. One exception is the Native American population, whose score drops significantly from 61.39 above the poverty line to 46.93 below the poverty line.

Within Wilmington, there is a significant difference in the Labor Market Index for Black, non-Hispanic population and the other groups. The low score for the Black population (36.05) means that there is less access to jobs. This figure is considerably lower than the White and Asian populations, which are 64.06 and 64.41, respectively. Populations below the poverty line experience a lower score for the Labor Market Index across all racial groups with the Black population, again, being disproportionately low.

The regional Labor Market Index is very similar to that of the city of Wilmington. The lowest score is Black, non-Hispanic (37.20) and the highest is Asian or Pacific Islander (64.23). The Jobs Proximity Index in the region is approximately 5-10 points lower across all racial groups when compared to the city, which is to be expected considering the Wilmington is the urban center for the region.

ii. How does a person's place of residence affect their ability to obtain a job?

An individual's place of residence can greatly affect their ability to get a job. Job seekers need to be close to jobs or have easy access to reliable transportation – personal or public – in order to secure and keep employment. Low-income individuals have a greater dependence on public transportation to get to jobs due to a lower rate of reliable personal automobile ownership. For low-income individuals without access to public transportation, it can become a cycle where a lack of a job leads to an inability to purchase reliable transportation, which is necessary in order to find a job. The Jobs Proximity Index is fairly consistent throughout the city, showing that there do not appear to be any significant barriers to employment based on place of residence.

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

Black, non-Hispanic populations are least successful in accessing employment. They have a considerably lower ranking in the Labor Market Index in the city and the region as a whole, as well as populations above and below the federal poverty line.

c. Transportation Opportunities

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity includes information on access to transportation by using the Low Transportation Cost Index and the Transit Trips Index. The Low Transportation Cost Index measures the cost of transportation and proximity to public transportation, and the Transit Index measures how often low-income families use public transportation. HUD Map 12 - Demographics and Transit Trips and HUD Map 13 - Demographics and Low Transportation Cost, show racial demographics and Transit Trips as well as racial/ethnic demographics and Low Transportation Costs.

In Wilmington, the Transit Trips Index score is very similar for all racial/ethnic groups. The highest score is 43.07 for the Black population and the lowest is 37.39 for the White population. In general, the population below the poverty line has a higher score than the total population. The Asian or Pacific Islander population below the federal poverty level has a score of 46.67 (the highest for this Index) and the Native American population below the federal poverty level has a Transit Index Score of 36.95 (the lowest for this Index).

The region as a whole has generally lower scores for the Transit Index. For the Total Population of the region the lowest Transit Index score is the Native American population with a score of 29.47 and the highest score is the Black, non-Hispanic population with 33.05. For the population below the poverty level the highest score is Asian or Pacific Islanders with 44.85 and the lowest is White with a score of 32.55.

The Low Transportation Cost Index is also very similar across racial/ethnic demographics in Wilmington for the total population. The highest score is 55.86 (Black, Non-Hispanic) and the lowest score is 47.47 (White, Non-Hispanic). There is more variance between racial/ethnic groups for the population below the poverty line. The highest score (66.85) is the Asian or Pacific Islander population and the lowest score (49.57) is the Native American population.

The scores for the Low Transportation Cost Index is significantly lower in the region as a whole than it is in Wilmington. For the total population, the highest score was only 40.01 (Black, non-Hispanic) and the lowest score was 33.23 (White, non-Hispanic). The population below the poverty level has higher scores for this Index. The lowest score of 40.93 is the White population and the highest score of 62.64 is the Asian or Pacific Islander population.

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

The group most affected by lack of reliable, affordable transportation is Native American residents below the poverty line. When compared to other groups they are not disproportionately affected, but they are the most affected.

iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

The regional transportation authority, WAVE, does not have resources to provide the level of service needed. Changes in routes in a few in public housing developments limits access to transportation. Furthermore, the New Hanover County budget cut funds to WAVE which results in service cuts. WAVE also has aging fleet and has experienced increasing down time, due to mechanical difficulties.

Most bus stops are on an hourly stop schedule, which limits access due to long wait times between buses. The bus stops service at 9:00 pm Monday through Saturday, thereby limiting access to those with jobs or other need for transportation after 9:00 pm. On Sundays, bus service ends at 6:00 pm, again not conducive to employees of many businesses, such as the hospital for example.

d. Low Poverty Exposure Opportunities

i. Describe any disparities in exposure to poverty by protected class groups.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity includes the Low Poverty Index, which uses rates of family poverty by household to measure exposure to poverty. A higher score generally indicates less exposure to poverty and a lower score generally indicates high exposure to poverty. HUD Map 14 - Low Poverty Index by Race/Ethnicity, displays racial/ethnic demographics and poverty rates.

In Wilmington there is considerable variance in exposure to poverty based on racial/ethnic demographics. In the population as a whole, the Black population has a score of 21.55, which means they have high exposure to poverty. This matches what we see in HUD Map 14 where the areas of high Black concentrations are also the areas with the greatest poverty. White and Asian or Pacific Islander populations have considerably higher scores on the Low Poverty Index, 51.30 and 52.71, respectively, meaning these groups have less exposure to poverty.

Unsurprisingly, scores on the Low Poverty Index are lower across all racial/ethnic demographics for the population below the federal poverty line for the city of Wilmington. The Black population has the lowest score with 14.95, and the White and Native American populations have the highest scores with 38.68 and 39.72, respectively.

In the region as a whole, scores are generally higher but the same racial disparity persists. Among the total population of the region, the lowest score on the Low Poverty Index is the Black population with a score of 31.01 and the highest scores are White and Asian or Pacific Islander populations with 55.11 and 59.88.

The scores decrease for the population below the poverty line for the region as a whole. The Black population is, again, the lowest score with 18.24. The White population is highest with 45.45 and the second to highest score is the Native American population with 43.80.

ii. What role does a person’s place of residence play in their exposure to poverty?

A person’s place of residence can play an important role in exposure to poverty. Poverty is primarily located in residential areas with little access to economic opportunities, and this is particularly true for Black residents who are segregated and live in the R/ECAP districts. If a person lives in an area of low poverty it is unlikely that they will be exposed to it because most commercial areas are separated from high-poverty residential areas. If, on the other hand, someone lives in a high poverty area they are going to have limited opportunities to escape it due to limited transportation and economic opportunities.

AFH Map 6: Concentrated Persistent Poverty, displays census tracts of persistent poverty in Wilmington. A tract is considered to have “persistent poverty” if 20 percent or more of the population has been in poverty over the last 30 years. In addition to the R/ECAP tracts, there are several other census tracts in the city facing persistent poverty. The majority of the downtown area, the northern tract near the airport, the census tract to the west of UNCW, and the area south of Sunset Park all experience persistent poverty.

AFH Map 6: Concentrated Persistent Poverty (See Appendix)

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

Black, non-Hispanic residents are most affected by poverty indicators. They have significantly lower scores on the Low Poverty Index.

iv. Describe how the jurisdiction’s and region’s policies affect the ability of protected class groups to access low poverty areas.

The placement of public housing within areas of concentrated poverty inhibits the ability of protected class groups, particularly Black families in R/ECAP census tracts, from accessing low poverty areas. Policies of focusing housing assistance within areas of high poverty serve to isolate those areas from the city as a whole and reinforces segregation. According to the City of Wilmington’s Create Wilmington Comprehensive Plan, Wilmington today is primarily built out and is expected to grow by nearly 60,000 people by 2010. That said, land is at a premium and locating affordable housing opportunities in low poverty areas competes with market rate development. The Comprehensive Plan identifies the need for a diversity of housing options

and offers policies to promote mixed-income neighborhoods (3.1.1) and disperse the production of affordable and workforce housing throughout all areas of the city (3.1.2).

e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity includes the Environmental Health Index which measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins. HUD Map 15 - Demographics and Environmental Health, shows residency patterns of racial/ethnic groups by exposure to environmental health hazards.

Within Wilmington, there is little variation among racial/ethnic groups in Environmental Health Index scores among the total population. The highest score is the Hispanic population with 72.62 and the lowest score is the Black population with a score of 67.77. For the population below the poverty line the Hispanic population has the highest score (71.38) and the Native American population has the lowest score (67.80).

Scores are very similar in the region as a whole. The total population in the region has a top score of 70.04 (Hispanic population) and a low score of 67.34 (Black population). The scores are similar for the population below the poverty line in the region as a whole. The Asian or Pacific Islander population has the highest score (70.86) and the Native American population has the lowest score (65.88).

(Source: HUD Table 12 - Opportunity Indicators, by Race/Ethnicity)

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

The Black, Non-Hispanic population above the poverty line has slightly less access to environmentally healthy neighborhoods. The difference among groups is incredibly small and does not show disproportionate access.

f. Patterns in Disparities in Access to Opportunity

i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify

areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

The adjacent census tract 103, includes Creekwood Public Housing and surrounding neighborhoods that have poor access to opportunity and concentrations of poverty. This area was recently selected for development of a new City police and fire training facility and upgrades to the Maides Park and recreation center. A LIHTC project for workforce housing is proposed for this area as well. Similarly, the areas adjacent to the Southside R/ECAP, census tract 110, includes a public housing community, Houston Moore, that has limited access to opportunity and concentrated poverty in the immediate area.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

According to the 2016 Wilmington Action Plan, several special populations, including the elderly, disabled, homeless, and ex-offenders, have decreased job and earned income opportunities in Wilmington. The influx of retired individuals has driven up the cost of housing much more quickly than income in the city. In addition, according to the Wilmington's Comprehensive Plan, the city is 90 percent built up, meaning there is little space for additional housing growth to bring down costs.

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

The Blue Ribbon Commission (BRC) was established to address youth violence in the R/ECAP tracts in Wilmington. Following the Harlem Children's Zone model of transforming a community one block, one area at a time, the BRC designated an area of the north side the Youth Enrichment Zone (YEZ), which includes 3 public schools, and a private charter school and seeks to improve educational opportunities for youth and provide comprehensive family services to improve outcomes for disadvantaged youth. The BRC's goal is to provide exposure

opportunities to experiences outside the immediate environment, and provide a pathway out of poverty.

BRC uses assets in the community to develop youth development programs to reach children and youth in their homes, schools and neighborhood. Through the BRC, access to collaborative partners is provided and with resources available such as: afterschool programs, job skills program, parental support services, health and wellness services, behavioral and mental health services, and assistance for basic needs.

Before expanding to encompass the YEZ, in 2012 the BRC helped reopen public middle school, D.C. Virgo Preparatory Academy, also located in the YEZ. D.C. Virgo Preparatory Academy was originally shut down because of low enrollment and low performance. The school is primarily Black students and is an all free lunch school as of 2014. In addition to its continued work with the school, BRC has expanded its services over to New Hanover High School. BRC is working with the UNCW to develop a longitudinal study and measure its impact on YEZ youth.

Some other programs include:

Turnaround Suspension Program, which provides academic support as well as anger management, self-efficacy, gang prevention and mental health services.

James H. Faison, Jr. Scholarship Program, which is available to YEZ residents who are either graduating high school seniors or adults wishing to return to school.

School break programs, which are a response to the needs expressed by parents to provide an opportunity for at-risk 7th and 8th grade students to have access to a 5 week academic and enrichment based summer program free of charge.

The Summer Employment Program, which is an 8 week job skills and internship program for rising 10th-12th grade students from the YEZ.

Community engagement programs at the Hemenway Community Center and the YEZ Community Council and the Youth Advisory Board.

BRC also organizes monthly community events and the Community Garden Project.

More information on the BRC and its programs can be found at www.brczone.org.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- **The availability, type, frequency, and reliability of public transportation**
- **Location of proficient schools and school assignment policies**
- **Lending Discrimination**

The availability, type, frequency, and reliability of public transportation is a significant issue in Wilmington. The regional transportation authority (WAVE) is unable to provide the service needed due to lack of resources. For low-income families who are dependent on public transportation this can be a barrier to them having reliable access to work. Recently, services have been cut due to budget cuts and the fleet has begun experiencing a greater number of mechanical difficulties due to the age of the fleet.

The *Location of proficient schools and school assignment policies* have reduced the access of the Black, Non-Hispanic population to proficient schools. Schools near the R/ECAPs tend to have lower proficiency scores than other schools in the city.

4. Disproportionate Housing Needs

1. Analysis

a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

As defined by HUD, there are four housing problems. A household is said to have a housing problem if they have any 1 or more of the following problems:

1. Housing unit lacks complete kitchen facilities
2. Housing unit lacks complete plumbing facilities
3. Household is overcrowded, meaning there is more than 1 person per room
4. Household is cost burdened, spending more than 30 percent of monthly income on housing costs

HUD also identifies four *severe* housing problems:

1. Housing unit lacks complete kitchen facilities
2. Housing unit lacks complete plumbing facilities
3. Household is severely overcrowded, meaning there are more than 1.5 people per room
4. Household is severely cost burdened, spending more than 50 percent of monthly income on housing costs

HUD Table 9 - Demographics of Households with Disproportionate Housing Needs, breaks down the households experiencing any of 4 housing problem, any of 4 severe housing problems, and households with severe cost burden.

Within Wilmington, the percentage of households experiencing any of 4 housing problems is broken into two basic groups along racial/ethnic lines. Three racial/ethnic populations have relatively high rates of experiencing housing problems, Black (58.46%), Hispanic (66.04%), and Other (68.97%). On the other end of the spectrum, the three racial/ethnic groups with relatively low rates of experiencing housing problems are White (38.91%), Asian or Pacific Islander (40.85%), and Native American (40.00%). Household size and type also effect the how likely it is a family faces housing problems. Families or households with over five or more people and non-family households experience housing problems at a relatively high rate, 57.61 and 52.12 percent respectively. Family households with fewer than five people experience

housing problems at the lowest rate, 34.96 percent.

For people facing severe housing problems, all racial and ethnic groups are similar, with the exception of the White population. The White population, at 21.67 percent, has severe housing problems significantly less frequently than Black (35.21%), Hispanic (36.66%), Asian or Pacific Islander (36.62%), Native American (40.00%), or Other (38.34%) populations.

There is some variation among racial and ethnic groups when it comes to cost burden. White families experience severe cost burden at the lowest rate in Wilmington at 19.74 percent, while Native American families experience it at a rate of 40 percent, the highest in the city. Household size and type is also correlated to severe housing cost burden. Non-family households have the highest rate of 29.22 percent and family households with less than five people have the lowest rate of 15.56 percent. (Source: HUD Table 10 - Demographics of Households with Severe Housing Cost Burden, CHAS 2007-2011)

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

HUD Map 7 – Housing Burden and Race/Ethnicity and HUD Map 8 – Housing Burden and National Origin show the living patterns for individuals by race/ethnicity or national origin with the percentage of households experiencing one or more housing problems.

In HUD Map 7 families experiencing housing cost burden are concentrated around northwest Wilmington, with R/ECAP areas with a large Black population often having the highest rates.

In HUD Map 8 there is no clear correlation between housing burden and national origin.

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

HUD Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children shows the publicly supported housing programs in Wilmington. Public Housing in Wilmington is fairly evenly distributed by household size. There are many bedroom options to accommodate different sized families. Project-Based Section 8 housing has significantly more small units (0-1 bedrooms) than 2 bedroom units or 3+ bedroom units, but there is still adequate housing for families with children. There are 204 families with

children in Project-Based Section 8 housing and 157 2-bedroom units and 144 units with 3+ bedrooms. Only 229 (16.89%) of HCV program participants use them for 0-1 bedroom units, while 639 (47.12%) are 2-bedroom and 456 (33.63%) are 3+ bedrooms.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Within Wilmington there are significant differences in the rate of renter- and owner-occupied housing by race and ethnicity. According to 2010-2014 ACS estimates, the White population makes up 76.0% of the total population, but 88.2% of owner-occupied housing. Non-White populations are disproportionately renters instead of homeowners.

AFH Table 3: Renter and Owner Occupied Housing by Select Race/Ethnicity (See Appendix)

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

Data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA) were examined to analyze lending practices in the City of Wilmington. The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), and originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: is a federally insured or regulated institution; originates a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originates a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent or more of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding

\$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but must be evaluated in light of other factors. For instance, while it is possible to develop conclusions simply on the basis of race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for the City of Wilmington, summarizing 2014 HMDA data (the most recent year for which data are available), and data between 2007 and 2014 where applicable. Due to the structure of HMDA data, the geographic proxy for Wilmington utilized in this analysis includes all Census tracts within the City’s boundaries. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. This analysis focuses only on the information available and does not make assumptions regarding data that are not available or were not provided as part of the mortgage application or in the HMDA reporting process.

2014 City Overview

In 2014, Wilmington residents applied for roughly 5,890 home loans to purchase, refinance or make home improvements for a single family home – not including manufactured homes. Of those applications, over 3,000 (52%) were approved and originated. Of the remaining 2,850 applications, approximately 850 (14% of all applications) were denied for reasons identified below. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each

loan. The balance of the 2,000 applications that were neither originated nor denied were closed for one reason or another including: a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant.

AFH Table 4: Disposition of Application by Loan Type and Purpose, 2014 (See Appendix)

Of the home purchase loans for single-family homes that were originated in 2014, (1,808 loans originated) approximately 80 percent were provided by conventional lenders. The remaining 20 percent were provided by federally-backed sources including the FHA, VA and FSA/RHS (Rural Housing Service). The FHA, VA, RHS lenders had application/approval ratios of 40 percent, 44 percent, and 39 percent respectively. Conventional lenders, by contrast originated home purchase loans at a higher 54 percent of all applications.

A further examination of the 850 denials indicates that nearly two-thirds of all denials were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was lack of collateral (24% of refi. denials) followed closely by debt-to-income ratio (23% of refi. denials). Typically, homeowners seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water.”

The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Wilmington varies among Whites, Blacks, and Hispanics. The overwhelming majority of conventional home purchase applicants in Wilmington were White (95%) – Black and Hispanic applicants represented 3 percent and 2 percent of all applicants, respectively. However, in 2014, Blacks (at 13%) were more than twice as likely to be denied for conventional single-family home purchases as Whites (6%). Hispanics were denied at a rate of 9 percent.

A closer look at home purchase denial rates by race/ethnicity and income group within Wilmington, shown in AFH Chart 3 – Single Family Home Purchase Denial Rate 2014, illustrates that high-income Blacks and Hispanics (having greater than 120% of Area Median Income) were more likely to be denied for a single family home purchase, both at 12 percent, than low-income Whites (having 80% or less of Area Median Income), at 9 percent. Low-income Blacks

and Hispanics were denied at 24 and 23 percent, respectively. White applicants demonstrated the lowest disparity in denial rates between their low- and high-income applicants at 4 percent, compared to 12 percent for Blacks and 11 percent for Hispanics. (Source: AFH Chart 3 – Single Family Home Purchase Denial Rate, 2014)

AFH Chart 3 – Single Family Home Purchase Denial Rate, 2014 (See Appendix)

Application Denial Reasons by Income Group

AFH Charts 4 and 5 in the appendix compare denial reasons among Black and White applicants by income group. Due to lack of information provided regarding denial reasons for Hispanic applicants and a small sample size, Hispanic applicants have been excluded.

AFH Chart 4 – High Income Denial Reasons by Race, 2014 (See Appendix)

As of 2014, the leading denial reason for High Income Whites was lack of collateral, representing just under a third (32%) of all denials. By contrast, High Income Blacks were most likely to be denied for credit history, at 40 percent. While High Income Blacks and Whites had roughly similar shares of collateral and incomplete application denials, High Income Blacks were more than twice as likely to be denied for credit history while High Income Whites were twice as likely to be denied for debt-to-income ratio.

AFH Chart 5 – Low Income Denial Reasons by Race, 2014 (See Appendix)

Low Income Blacks were similarly denied at the highest rate for credit history, at nearly half of all denials. For Low Income Whites, debt-to-income ratio and credit history were the top reasons, at 31 percent and 29 percent respectively.

Wilmington's Single Family Lending Market, 2007-2014

The following section examines HMDA data over the time period 2007-2014, for the City of Wilmington.

Highlighted in AFH Chart 6 - SF Loan Originations and Application Denials, the number of single-family loan originations followed a dynamic trajectory between 2007 and 2014, trending downward between 2007-2011, followed by a sharp uptick between 2011 and 2012. Between 2012 and 2014, however, total originations declined by over a third (36%) to a level slightly below that of 2007. While the 2014 level of originations was below that of 2007, the years of 2012 and 2013 saw relatively high numbers of originations compared to the other years examined. The number of denials within Wilmington showed a similar trend, though less pronounced, between 2007 and 2014. Total denials fell by approximately a quarter during the same time period.

AFH Chart 6 - SF Loan Originations and Application Denials (See Appendix)

AFH Chart 7 – SF Loan Originations by Purpose shows the surge of loan originations that occurred between 2011 and 2012 was the result of a significant increase in the number of refinancing originations. Though refinancing was the top loan purpose by total originations between 2007 and 2013, as of the most recent data year home purchase originations are the leading loan purpose. Further, home purchase originations have been on a steady upward trajectory since 2010, while refinancing originations have fluctuated year-to-year.

AFH Chart 7 – SF Loan Originations by Purpose (See Appendix)

Income, Race, and Single Family Loan Denials in Wilmington

Denial rates for single-family loans in Wilmington over time vary by race and ethnicity. AFH Chart 8 – Single Family Denial Rate by Race/Ethnicity shows that between 2007 and 2014, Blacks were consistently denied at the highest rate relative to Whites and Hispanics, with Blacks usually hovering around 25 percent – nearly double the White average of 13 percent. Hispanic denial rates showed the greatest variability between 2007 and 2014, and in 2013 converged to the same denial rate as White applicants (though the rate for Hispanics rose sharply between 2013 and 2014). The disparity between Black and White applicants in loan denial rates remained relatively consistent between 2007 and 2014.

AFH Chart 8 – Single Family Denial Rate by Race/Ethnicity (See Appendix)

A view of single-family denial rates by applicant income group within Wilmington, highlighted in AFH Chart 9 – SF Denial Rate by Applicant Income Group, shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups. Between 2007 and 2014, applicants in the Very Low Income category (50% or less of Area Median Income), were consistently more likely to be denied for a single-family loan than any other income group. Low Income applicants (between 50% and 80% of Area Median Income) were denied at the second highest rate, though the group generally had denial rates closer to higher income groups than Very Low Income applicants. Middle Income applicants (80% to 120% of Area Median Income) maintained the second-lowest denial rate between 2007 and 2014, while the lowest denial rate in every year examined belonged to the High Income group (greater than 120% of Area Median Income). Consistent with a citywide decline in the single-family denial rate, every income group's denial rate fell between 2010 and 2014, though Low and Middle income applicants experienced a mild uptick between 2013 and 2014.

AFH Chart 9 – SF Denial Rate by Applicant Income Group (See Appendix)

In addition to the income of the applicant, the median income of the property's Census tract also reveals decreasing denial rates as tract income group rises, with the exception of 2008 when Low Income tracts were less likely to be denied than Middle Income tracts. While all tract income groups, similar to borrower income groups, have seen declines in denial rates since 2010, Low and Very Low Income tracts increased between 2013 and 2014 as Middle and High Income tracts declined. (Source: AFH Chart 10 – SF Denial Rate by Census Tract Income Group)

AFH Chart 10 – SF Denial Rate by Census Tract Income Group (See Appendix)

Though Very Low Income tracts represent 12 percent of all Census tracts within Wilmington, they are represented by approximately 5 percent of total originations and total applications as of 2014. Similarly, Low Income tracts, comprising 27 percent of all tracts, represent 14 percent of the City's total applications and 12 percent of all originations. This suggests that Low and Very Low Income tracts within Wilmington are less likely to participate in the lending market. By contrast, loan applications and originations within Wilmington are disproportionately likely to occur for properties in Middle and High Income tracts. For example, Middle and High Income tracts represent 60 percent of the Wilmington total, but account for 81 percent of applications and 83 percent of all single-family loans originations throughout the City in 2014. Relatedly,

Low and Very Low Income tracts represent 40 percent of all tracts, but only accounted for roughly 17 percent of all single-family loan originations during the same year.

AFH Chart 11 – Originations and Denials by Census Tract Income, 2014 (See Appendix)

The Subprime Market

Illustrated in AFH Chart 12 – Single Family Subprime Mortgage Originations, the subprime mortgage market in Wilmington declined significantly from 2007 to 2010, at which point it began to gradually increase. The total number of subprime loan originations fell by over 70 percent between 2007 and 2014 – nearly three times higher than the total origination decline of 25 percent. However, since 2010, the number of subprime loan originations has more than doubled, but still remains less than 30 percent of 2007 levels. Relatedly, subprime originations as a percent of Wilmington’s total has declined from 15 percent to 5 percent.

AFH Chart 12 – Single Family Subprime Mortgage Originations (See Appendix)

Looking at the share of subprime loans as a percentage of total originations by race/ethnicity, Black loan recipients were more than 4 times more likely to be subprime than White loan recipients in 2007. This trend is consistent with the broader national trend of minorities being disproportionately negatively impacted by predatory subprime lending leading up to the housing crash. Recent years have seen the share of Black subprime mortgages fluctuate, albeit at a substantially lower level than before the downturn. Though the gaps between subprime percentages by race/ethnicity have declined considerably since 2007, as of 2014 Black loan recipients were still more than 3 times as likely to have a subprime loan than White recipients.

AFH Chart 13 – Percent of Subprime Originations by Race/Ethnicity (See Appendix)

Subprime originations by income group totals show a sharp decline between 2007 and 2009, with fluctuations occurring between 2009 and 2014. Between 2013 and 2014, subprime shares for all income groups increased, though changes were most pronounced among middle and lower income groups.

AFH Chart 14 – Percent of Subprime Originations by Borrower Income Group Totals (See Appendix)

Wilmington's subprime origination trends are consistent with the tightened credit conditions and heightened home lending standards that have taken place in the aftermath of the financial crisis and Great Recession.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

The following housing needs have been identified across the City and impact both publicly supported housing as well as privately owned and managed housing units.

- The availability of developable land in the city is increasingly small; there is approximately only 10 percent available for new development. Policy changes within the city have taken effect to maximize land use to encourage greater density. Affordable housing projects compete with the market for limited land, which is especially challenging outside of areas of concentrated poverty
- Many property owners have a "NIMBY" perspective on public housing, which prevents development in wealthier neighborhoods
- Wilmington has faced economic changes, including job loss, job insecurity, and difficulty acquiring credit for homebuyers. Local organizations are having difficulty selling their inventory, and the City of Wilmington's Homeownership Opportunities Program has seen a decline in the number of loans made
- Rental property demand has increased the market rate for rental property in the city and has reduced rental vacancy to historic levels.
- There is a lack of funding available for affordable housing in the city. The local governments struggle with decreasing revenue streams, a problem that will likely continue.
- There is a lack of availability of permanent resources to assist with transitioning homeless individuals into permanent housing
- Across the city, approximately 50 percent of the existing housing stock was constructed prior to 1979. Homes of this age often contain hazardous materials like asbestos and lead-based paint. When working with these homes, the cost of rehabilitation is often much higher due to the increased costs associated with hazard remediation. Unfortunately, these conditions disproportionately affect low-to-moderate income families.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Displacement of residents due to economic pressures
- Land use and zoning laws
- Lending Discrimination

As discussed elsewhere, the *displacement of residents due to economic pressures* is a factor that significantly impacts the severity of disproportionate housing needs. Low-income families, particularly those who are in segregated R/ECAPs, face economic pressure that prevents them from accessing affordable housing. Retirees moving into Wilmington drive up land prices and students in the region compete for low cost housing.

Wilmington has limited space for housing and *land use and zoning laws* can prevent housing needs from being met. Local regulations are being altered to address this need but the issue still persists.

Lending discrimination based on race is illegal but still occurs. The Single Home Purchase Denial Rate is significantly higher for Blacks and Hispanics than for Whites within the same income group. For example, in the high-income group (having greater than 120% of Area Median Income) Blacks and Hispanics are denied a loan 12 percent of the time but Whites in that income category are only denied 5 percent of the time.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

Yes. Blacks make up 19.2 percent of the population in Wilmington, however 34.5 percent of persons experiencing extremely low incomes (0-30% AMI) are from the race group. Approximately 30.1 percent of very low income (0-50% AMI) in Wilmington are also Black. Consequently, Blacks experience a higher portion of publicly supported housing resident households than all other races with those in public housing (92.2%) and HCV Programs (78.2%). (Data Source: HUD Table 6 - Publicly Supported Housing Residents by Race/Ethnicity)

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

In comparing protected groups (elderly, disability, race and familial status) to the general population in Wilmington with regards to publicly supported housing, persons who are elderly, disabled persons, Blacks, and families with children have a higher proportion of those in public housing programs than the general public in many public housing categories. The data from the HUD provided AFFH tables provide figures for public housing households in racially/ethnically-concentrated areas of poverty (R/ECAP) tracts and non-R/ECAP tracts, and both will be compared against the general population estimates.

Elderly

According to the HUD provided Table 2 – Demographics Trends, in 2010 elderly 65 and over made up approximately 13.9 percent of the population in Wilmington. In regards to residents in publicly supported housing, elderly made up a larger percentage of the development population than in the general population for all four public housing categories – especially in

regards to R/ECAP tracts. For public housing developments, in non-R/ECAP, only 12 percent were elderly, however in R/ECAP tracts 24.9 percent were elderly – 11 percent higher than the general population. For the HCV program, in non-R/ECAP 15.9 percent were elderly, and in R/ECAP tracts 23.7 percent were elderly – almost ten percent higher than the general population. Project based Section 8 and Other HUD Multifamily experienced a much higher percentage of participants being elderly than the general population in the City with 68.9 percent and 93 percent respectively. (Data Source: HUD Table 7)

Persons with a Disability

According to the 2010-2014 ACS, persons with a disability made up approximately 13.2 percent of the population in Wilmington. Persons with a disability made up a larger percentage of the public housing population than in the general population in two categories. For public housing developments, in non-R/ECAP, 33 percent were persons with a disability, and in R/ECAP tracts 25.9 percent were persons with a disability – both higher than the general population. For the HCV program, in non-R/ECAP 26.6 percent were persons with a disability, and in R/ECAP tracts 25.7 percent were disabled – also both higher than the general population. (Data Source: HUD Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

Blacks

According to the HUD provided Table 2 – Demographics table, in 2010 Blacks made up approximately 19.2 percent of the population in Wilmington. Blacks made up a larger percentage of the public housing population than in the general population for all four public housing categories – especially in regards to R/ECAP tracts. For public housing developments, in non-R/ECAP, 88.2 percent were the race group, and in R/ECAP tracts 96.8 percent were Black – both well above the general population. For the HCV program, in non-R/ECAP 74.1 percent were the race group, and in R/ECAP tracts 89.3 percent were the race group – also well higher than the general population. Project based Section 8 and Other HUD Multifamily also experienced a higher percentage of participants being Black than the general population in the City with 37.1 percent in Section 8 and 20.5 percent in Other HUD Multifamily programs. (Data Source: HUD Table 7)

Families with Children

Families with children made up approximately 41.7 percent of the population in Wilmington in 2010 (HUD Table 2). Families with children made up a larger percentage of the public housing population than in the general population in two categories. For public housing developments,

in non-R/ECAP, 53.5 percent were families with children, and in R/ECAP tracts 42.8 percent were this family type – both higher than the general population. For the HCV program, in non-R/ECAP 46.6 percent were families with children, however the number increases in R/ECAP tracts to 52 percent – both were also higher than the general public. (Data Source: HUD Table 7)

Public Housing R/ECAP and non-R/ECAP tract comparison

There are generally more elderly people residing in public housing programs in R/ECAP tracts than in non-R/ECAP tracts. Elderly in R/ECAP tracts have 24.9 percent in public housing developments, compared to only 12 percent in non-R/ECAP tracts. Elderly in R/ECAP tracts also have 23.7 percent in HCV programs, compared to 15.9 percent in non-R/ECAP tracts.

Blacks also participate in public housing programs in R/ECAP tracts in higher numbers than in non-R/ECAP tracts. The race group in R/ECAP tracts has 96.8 percent in public housing developments, compared to 88.2 percent in non-R/ECAP tracts. Blacks in R/ECAP tracts also have 89.3 percent in HCV programs, compared to 74.1 percent in non-R/ECAP tracts.

Families with children are more prominent in the HCV program in R/ECAP tracts in Wilmington. The family type in HCV programs has 52 percent in R/ECAP tracts, compared to 46.6 percent in non-R/ECAP tracts. (Data Source: HUD Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

Public Housing

According to HUD, a concentration is defined as the existence of ethnic/racial minorities in a Census Tract at a rate of 10 percent or higher than the City as a whole. As Wilmington has 19.2 percent of the total population as Blacks, a concentration of the race group would be a tract with 29.2 percent or higher as the race group (Source: HUD Table 2, Census 2010). AFH Map 7 – Percent of All People who are Black in 2010 shows areas where there is a concentration of Blacks.

AFH Map 7 – Percent of All People who are Black in 2010 (See Appendix)

The darkest blue shaded areas are where there is a concentration of Blacks (a concentration is 29.2% or more of the population in the census tract).

AFH Map 8 – Public Housing Concentration displays visually the geographic location of Public Housing developments. There is a distinct correlation between the location of public housing developments and the concentration of Blacks in Wilmington, which are also concentrated near R/ECAP tracts. Public housing developments and HCV program participants are concentrated in the northwest area of the City.

AFH Map 8 – Public Housing Concentration (See Appendix)

The concentration of Blacks in the Northern portion of the City may be attributed back to as early as the late 1800s, when a vibrant African-American community thrived in the Northside neighborhood, just north of the historic downtown. Following a period of social strife at the close of the 19th century, the neighborhood declined, which eventually brought about, in 1939, the development of a public housing complex known as the Robert R. Taylor Homes (Taylor Homes). Taylor Homes was designated as “Black Only” housing. Since that time, the original Taylor Homes has been demolished and a new low-income housing tax credit development was constructed at that location. The City, in partnership with WHA, invested HOME and CDBG funds to leverage LIHTC and other financing to redevelop the site into Senior Housing, Family LIHTC and Public Housing. The three-phase project resulted in 198 units. The area has seen a reduction in crime and an increase in quality of life. Many residents of the original Taylor Homes desired to return to the redeveloped area as they grew up there and residents considered it home.

In addition to HUD funds, the City invested in new Police Headquarters in the Taylor Homes neighborhood and improvements to the City Park, including a splash pad. The City also provided a portion of funds and leased an old City garage that was rehabilitated into DREAMS Community Arts Center. The Center provides award-winning arts education to area youth afterschool and in summer.

The City also provided general funds and CDBG to support programming and facility improvements at Community Boys and Girls Club located in and serving youth in the Northside. City CDBG funds used to revitalize Brooklyn Arts Center serve as a catalyst to redevelopment of 4th Street area known as Brooklyn Arts District. The area is now home to new multifamily

market rate projects and small businesses including restaurants, coffee shops, and neighborhood bars. This area is growing in popularity for employees of nearby PPD and others. Gentrification is a challenge for the area. In addition to multifamily projects, City HOME funds have been invested via CHDOs and Cape Fear Habitat for Humanity to construct new homes for low-to-moderate income homebuyers.

Housing Choice Vouchers

The concentration of HVC is also highest in Census tracts with a concentration of Blacks and R/ECAP tracts. Census tracts 37129011400, 37129010100, 37129011200 and 37129011100 as mentioned have a concentration of the race group with also 29.2 percent or greater voucher concentration, the highest in the City. The correlation between those that utilize the HCV program and being in the race group also falls within the R/ECAP tract as well. (Data Source: CPD Maps, Census 2010, HUD Map 6 - HCV and Race/Ethnicity)

Blacks have more households participating in the program than any other race group with 78.2 percent of the program households coming from this race group alone. (Data Source: HUD Table 6 - Publicly Supported Housing Residents by Race/Ethnicity)

Project-Based Section 8

According to the HUD Map 5, project-based Section 8 locations are located in or in near Black, Non-Hispanic color shaded areas with many utilizing Section 8 within the Census tracts with a concentration of the race group. (Data Source: HUD Map 5 - Publicly Supported Housing and Race/Ethnicity)

HUD Multifamily Assisted Developments and LIHTC

HUD Multifamily Assisted Developments and LIHTC properties are more spread out across the City and do not appear to be located in any areas with a concentration of race community. There are a few of these developments located in R/ECAP tracts, however they are not concentrated in those tracts. (Data Source: HUD Map 5)

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

While there is publicly supported housing for these groups, there was not an identifiable pattern in the geographic placement of these housing units in relation to the areas of segregation and/or the identified R/ECAPs. However, there were a few indicators that pointed to differences in the groups. A description of each group can be found below:

Elderly

The percent of elderly in public housing was higher in R/ECAP tracts than for non-R/ECAP tracts. For public housing in the City, Elderly households were 24.9 percent of the residents in R/ECAP tracts, and only 12 percent for non-R/ECAP tracts. For the HCV program in Wilmington, Elderly households were 23.7 percent of the residents in R/ECAP tracts, and 15.9 percent for non-R/ECAP tracts. (Data Source: HUD Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

Families with Children

According to the HUD Table 2 (Census 2010), there were 10,293 families with children in Wilmington – approximately 41.7 percent of the total families in the City. In that time, the average family size was 2.9 persons. In regards to public housing, the percent of families with children in public housing was lower in R/ECAP tracts than for non-R/ECAP tracts, however the percentage was higher in R/ECAP tracts than non-R/ECAP tracts for the HCV program. For public housing developments in the City, families with children households were 42.8 percent of the residents in R/ECAP tracts, compared to 53.5 percent for non-R/ECAP tracts. For the HCV program in Wilmington, families with children households were 52 percent of the residents in R/ECAP tracts, and 46.6 percent for non-R/ECAP tracts. (Data Source: HUD Table 7)

Disability

The percent of persons with a disability in public housing was generally lower in R/ECAP tracts than for non-R/ECAP tracts – possibly pointing to less access in these neighborhoods. For public housing in the City, persons with a disability in households were 25.9 percent of the residents in R/ECAP tracts, and 33 percent for non-R/ECAP tracts. For the HCV program in the City, persons with a disability in households were 25.7 percent of the residents in R/ECAP tracts, and 26.6 percent for non-R/ECAP tracts. (Data Source: HUD Table 7)

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

In Wilmington, Elderly and Blacks generally have a higher percentage of those in publicly supported housing in R/ECAP tracts than those who are not in R/ECAP tracts. Persons with a disability, Families with Children and other race and ethnic groups do not show a distinct pattern.

Public Housing

Elderly in R/ECAP tracts have 24.9 percent in Public Housing developments, compared to 12.1 in non-R/ECAP tracts. Blacks in R/ECAP tracts have 96.8 percent in Public Housing developments, compared to 88.2 percent in non-R/ECAP tracts. (Data Source: HUD Table 7)

HCV Program

For the HCV program, Elderly in R/ECAP tracts have 23.7 percent in HCV programs, compared to 15.9 in non-R/ECAP tracts. Blacks in R/ECAP tracts have 89.3 percent in HCV programs, compared to 74.1 percent in non-R/ECAP tracts. (Data Source: HUD Table 7)

For public housing, 503 total units were occupied in R/ECAP tracts while 473 were in non-R/ECAP tracts. For the HCV Program, 392 total units were occupied in R/ECAP tracts while 1,082 were in non-R/ECAP tracts. R/ECAP tracts have been identified as Census tracts in the City with a majority of Blacks (See Map 1), showing a correlation between the race group and a higher percentage participating in public housing and HCV programs. (Data Source: HUD Table 7)

Detailed comparison data for Project-based Section 8 and Other HUD Multifamily properties were not available.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

The Rental Assistance Demonstration was created in order to give public housing authorities, such as the Housing Authority of the City of Wilmington, the ability to preserve and improve public housing properties and address maintenance issues. The Low-Income Housing Tax Credit

(LIHTC) is a resource for creating affordable housing in the City. With these programs come some basic requirements involving fair housing and protecting some classes and low- and moderate-income households.

Public Housing

At this time, the public housing developments show low diversity within the developments, with exception to Solomon Towers. All other households in Public Housing developments (7 of 8) are primarily Black (over 90%). This figure is higher than the race population estimates in R/ECAP tracts in the City. Solomon Towers is the only public housing development with another race group having a percentage higher than 10 percent in the development (28% White).

Six of the eight public housing development sites also reported to have more than 50 percent of the household being households with children. Of these developments, two reported to have more than 70 percent of households with children and two others had more than 80 percent of households with children.

In June, 2016, Rankin Terrace converted from public housing to project based voucher rental assistance under HUD's Rental Assistance Demonstration (RAD) program. The unit mix was changed to 58 RAD PBV units and 19 standard PBV units. All previous public housing residents were given the opportunity to return to Rankin and the majority of those residents returned upon completion of construction.

(Data Source: HUD Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category)

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

Segregation is less apparent in Project Based Section 8 and Other HUD Multifamily Assisted Housing sites in Wilmington.

Project Based Section 8

In Wilmington, the Project Based Section 8 program has more diversity at their locations than Public Housing developments. Hadden Hall I and University Place are predominantly White with both having over 80 percent of the site being the race group. On the other hand,

Tidewater Townhomes and Market North Apartments are predominantly Black with both having over 80 percent of the site being the race group. Cape Fear Hotel Apartments and Glover Plaza show a mix of races. Cape Fear Hotel Apartments has 64 percent White and 36 percent Black, while Glover Plaza has 43 percent White, 53 percent Black and also 4 percent identifying as Hispanics.

Project Based Section 8 housing however had more households with children in households that were predominantly Black. Tidewater Townhomes and Market North Apartments are predominantly Black with both having over 80 percent of the site being the race group and they reported 74 percent and 69 percent of households with children respectively. All other Project Based Section 8 housing reported less than 1 percent of household with children in the City.

(Data Source: HUD Table 8)

Other HUD Multifamily Assisted Housing

Other HUD Multifamily Assisted Housing also has a diverse population at its locations in the City. Ahepa 408 Apartments has 56 percent White, 42 percent Black, and 2 percent Asians in its location. Hadden Hall II has 76 percent White and 24 percent Black. Other HUD Multifamily Assisted Housing did not report to have any households with children. (Data Source: HUD Table 8)

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

All public housing developments are located either in an area with a large Black population or in a R/ECAP tract. AFH Chart 15 – Demographic Comparison of Public Housing and Location in Wilmington, compares the Black populations in Wilmington’s public housing developments against the population of the census tracts in which the developments are located. Only one of the eight developments, Hillcrest, has a Black population that is less than 20 percentage points of Black population of the larger tract. In the remainder of the developments, the point gap between the two populations ranges from 20-55.

AFH Chart 15 – Demographic Comparison of Public Housing and Location in Wilmington, Blacks (See Appendix)

Project Based Section 8 housing in Wilmington is not as concentrated in R/ECAP tracts, however most are in close proximity to areas in the City with a higher concentration of Blacks. (Data Source: HUD Map 5)

Other HUD Multifamily Assisted Housing sites are more spread throughout the City, and do not show an obvious correlation between race and location. (Data Source: HUD Table 8, HUD Map 5)

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Access to Jobs & High Wage Jobs

Based on the HUD Maps, areas where there are a concentration of public housing developments, Project-Based Section 8, and LIHTC housing fall within the areas with a lower labor market index as compared to the other areas of the City (Source: HUD Map 11). Some areas in northwest Wilmington are also on the low end of the job proximity index. This points to a lack of accessible jobs for immediate residents as compared to other areas in the City. These areas are located in close proximity or are in R/ECAP tracts and are predominantly Black neighborhoods.

An effect of a lack of accessible jobs, or low wage jobs has on a household is poverty. In R/ECAP tracts and areas in close proximity in the City, poverty is higher than all other areas in Wilmington. The darker areas are defined as areas where there is less poverty in the Low Poverty index. (Data Source: HUD Map 14)

AFH Map 9 – Percent of All People Living in Poverty shows the percent of people living in poverty is also higher in R/ECAP tracts and areas in close proximity. As mentioned earlier, these

areas are also areas where there are a concentration of Blacks and a concentration of public housing developments.

AFH Map 9 – Percent of All People Living in Poverty (See Appendix)

Because the City of Wilmington is a coastal town, many job opportunities are within the service industry. Those jobs are low paying, minimum wage jobs. Since the recession, the unemployment rate has risen and there has been an influx of persons looking for jobs. A publicly supported housing resident with a lower education level is less likely to secure a high paying job compared to persons with a higher education level. Additionally, access to public transportation is a huge barrier when it comes to traveling to and from jobs and higher level education classes. The transit system does not currently operate at convenient times and locations for public housing and disabled persons that allow them the flexibility of working various hours or attending classes at night.

Access to High Performing Schools

Blacks are not finishing college at the rate of the general population in Wilmington. According to the 2010-2014 ACS (C15002B), approximately 12.7 percent of this race group 25 years and over have a Bachelor's degree or better, which is far below the citywide rate of 39.9 percent. As Blacks are 19.2 percent of the total population of the City (almost 1/5 of persons), when the race group is removed from the citywide percentage of those with a Bachelor's degree or better, the disparity can be expected to increase dramatically. Education however does not start at the college level, but at the elementary level. A high performing elementary or middle school is vital for the development of a student.

According to GreatSchools, which ranks public schools across the nation as high performing or low performing, the quality of elementary and middle school is lower performing in R/ECAP tracts and areas in close proximity, in comparison to schools outside of these tracts (higher performing schools in the east part of Wilmington). GreatSchools is a nationally recognized non-profit, which ranks public schools and provides profiles and also offers resources for parents and schools.

AFH Map 10 – Distance to High Performing School, displays visually the distance of a high performing school from R/ECAP tracts in the northwest area of the City.

AFH Map 10 – Distance to High Performing School (See Appendix)

Furthermore, there is a perception that it is very challenging for a family to find affordable

quality housing near public schools in the County and in Wilmington. In a community survey conducted in 2016 by UNCW, *Housing Affordability in New Hanover County: A Community Survey*, 57.1 percent of responders reported it was very challenging for a family with children to find affordable quality housing near quality public schools. Another 29.9 percent reported that it was somewhat challenging making a total of 87 percent responding that it was a challenge – an overwhelming majority. It is not without coincidence that the northwest area of the City is also with the highest concentration of cost burdened households (HUD Map 7), an area when cross-referenced with race, has a concentration of Blacks.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD- provided data.

According to the 2010-2014 ACS 5-Year Estimates, 13.2 percent of the population of Wilmington has a disability – 14,428 persons. For public housing developments in R/ECAP tracts, 25.9 percent and in non-R/ECAP tracts, 33 percent of the residents are with a disability, which is much higher in proportion to the city. Project-based Section 8 housing in non-R/ECAP tracts have 9.8 percent of its residents with a disability –lower than the citywide rate. Other HUD Multifamily housing in non-R/ECAP tracts have only 7 percent of its residents with a disability – also lower than the citywide rate. For the HCV program, R/ECAP tracts have 25.7 percent of its residents are with a disability, and in non-R/ECAP tracts the rate is higher at 26.5 percent – both are higher than the citywide average. (Data Source: HUD Table 7)

Many persons residing in publicly supported housing have lived in their homes all their lives. Residents are aging in place and the publicly supported housing population is becoming increasingly elderly. Some public housing residents have lived in their apartments for sixty years. Additionally, elderly residents are living on a fixed income and are not able to afford market-rate housing within the community.

The majority of families living in public housing in Wilmington are comprised of female head of households. A family of six typically has an annual income of less than \$15,000. According to the FY 2016 Fair Market Rent published by HUD, the monthly rent for a four-bedroom apartment is \$1,514. This equates to an annual rent of \$18,168, which far exceeds a typical public housing family's annual income.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

The Wilmington Housing Authority (WHA) has set up the Resident Advisory Board (RAB) to make recommendations to the PHA plan, which is submitted to HUD. RAB works closely with residents on site and helps give a voice from the residents to guide WHA programs and policies. Members of RAB are officers of resident organizations from the public housing communities along with a representative from the HCV program. In 2014, RAB worked closely with WHA and local law enforcement in Wilmington to deter bullying and violence, and making the communities a safer place to live. RAB also works with service providers to provide GED classes and women's groups to help address issues facing single mothers and open access to opportunities.

Choice Neighborhood Transformation Plan

WHA received a HUD Choice Neighborhood Transformation Plan (CNTP) grant in 2010. Located in the Dry Pond neighborhood, about 1.5 miles south of historic downtown Wilmington, Hillcrest public housing development was the target location. Under HUD, the CNTP program supports a locally appropriate strategy to address struggling neighborhoods with distressed public housing developments or HUD-assisted housing through a comprehensive approach to neighborhood transformation.

CNTP implements three components for revitalization of the area: housing, people and the neighborhood. Residents were involved in the planning and implementation process and considered data, strategies and action plans for various issues such as education and neighborhood safety using focus groups. A steering committee formulated the overall transformation plan from the recommendations made in the focus groups. The focus groups and steering committee was made up by community representatives and residents. WHA and the lead organizations approves the plan.

As of 2013, WHA's CNTP program initiated various projects such as four new Habitat homes, new LED street lights, a farmers market, the railroad & street clean up, and new sidewalks and ADA compliant cutouts. With these new improvements to the infrastructure in the area, WHA hopes the area will experience vitalization and kick starts the conditions necessary public and

private investment in the neighborhood. It is also important that through the CNTP program, there will be improved educational outcomes and intergenerational mobility for youth with services and other related support.

Access to Medical Care

Public Housing developments, Solomon Towers, Rankin Terrace, Houston Moore, Vesta Village and Hillcrest are all within 3 miles from New Hanover Regional Medical Center (NHRMC). All other developments in or near R/ECAP tracts are located less than 5 miles away. NHRMC is the major medical center in the area providing a wide range of healthcare needs. As a public, not-for-profit healthcare system, NHRMC offers care to everyone who needs it, regardless of his or her ability to pay. NHRMC provides more than \$145 million a year in charitable uncompensated care, often to those who would not otherwise have access to health care.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- **Community opposition**
- **Impediments to mobility**
- **Lack of public investments in specific neighborhoods**

Impediments to Mobility

Poverty is one of the most difficult barriers of upward mobility to overcome. The Equality of Opportunity Project, a joint effort by researchers from Harvard and the University of California at Berkeley, seeks new ways to improve socio-economic opportunities for low-income children. Through the course of their work, researchers determined there was a 31 percent change that a child who grew up with parents with an annual income less than \$25,200 will earn more than \$29,900 per year as an adult in Wilmington. This means that over two-thirds of children who grow up in poverty will make less than \$30,000 annually.

AFH Map 11 – Estimated Median Household Income, shows the median household income in Wilmington. One area in the northwest part of the City has a MHI of \$24,999 or less, and is also the location of R/ECAP tracts. The other location with a MHI of \$24,999 or less surrounds UNC-Wilmington, where the student income potentially skews the data.

AFH Map 11 – Estimated Median Household Income (See Appendix)

The people living in these areas – particularly the children – are unlikely to ever rise out of poverty. Organizations such as the Blue Ribbon Commission (BRC), which operates in the northwest area, were established to provide impoverished youth more exposure to opportunities and experiences outside of their immediate environment, and to assist in providing a pathway out of poverty.

Lack of private investment in specific neighborhoods

The northwest area of Wilmington has the highest percentage of business addresses that were

vacant in the first quarter of 2016 (20% or more). Census tract 37129011100, a R/ECAP tract, was buoyed by retail businesses and service shops along Dawson St/US-17 and parts of east Wooster St/US-76. Though certainly not the only indicator of a lack of private investment, the business vacancy rate does point toward the overall trend of a more depressed economy in the northwest area of the City. (Source: Valassis Lists 2016 via PolicyMap)

AFH Map 12 – Percent of all Business Addresses that were Vacant (See Appendix)

Other

As noted earlier, most public housing developments in the City are concentrated near predominantly Black communities or R/ECAP tracts. With the exception of Solomon Towers, 7 of the 8 developments report at least 94 percent or more of the residents as Black. Solomon Towers reported 69 percent of its residents are Black. While this may present the opportunity to further diversity in the public housing developments, the developments are still predominately Black, leading to the conclusion that the race groups are still segregated by some means. Access to public housing developments is not dependent on race, but because of location or preference, developments in R/ECAP tracts are still predominantly Black. (Data Source: HUD Table 8)

Furthermore, the lack of access to high performing schools creates a barrier to advancement of students in these areas to higher education. Without access to high performing schools, residents in the area will likely see low college education participation rates, and therefore low education attainment.

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

According to HUD Table 13 – Disability by Type, six types of disabilities were recorded with ambulatory difficulty being the most prevalent with 7.5 percent of the disabled population in Wilmington. 5.16 percent have a cognitive difficulty, 3.59 percent have a hearing difficulty, and 2.54 percent have a vision difficulty.

When referenced with the HUD Maps 16 and 17, R/ECAP tracts experience a higher concentration of physically disabled persons, and those with ambulatory, self-care and independent living difficulty had a higher concentration in areas within close proximity, or areas with a concentration of Blacks.

AFH Map 13 – Percent of Persons with a Disability shows there are fewer persons with disabilities in the eastern areas of Wilmington, and the concentration of people with disabilities increases towards the west (especially northwest) areas in the City.

AFH Map 13 – Percent of Persons with a Disability (See Appendix)

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

Disability Type

Persons with a disability appear to be clustered near R/ECAP tracts in Wilmington, however according to HUD Map 16 – Disability by Type, persons with a Cognitive Disability have a greater concentration in the tracts and other areas in close proximity to the tracts. All these tracts are located in the northwest area of the City. It should also be noted that the areas surrounding New Hanover Regional Medical Center and just east of S 17th St have a cluster of persons with Hearing Disability.

Ambulatory, Self-Care and Independent Living disabilities generally display the same geographic

location pattern as Hearing, Vision and Cognitive disabilities as they are also clustered in the northwest part of the City in R/ECAP tracts and in close proximity to these tracts.

Age

It is known that as people age, some in the population may start to develop unique and special needs to live in the community. The northwest area of Wilmington has a higher concentration of persons with disabilities. When referenced with HUD Map 17 - Disability by Age Group, the area is also found to have more disabled ages 18-64 and disabled over 64 than younger disabled persons. There does not appear to be any other correlation between persons with each type of disability when compared with different age groups in the City.

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

There is a lack of affordable, accessible units in both the jurisdiction and region. From a pure quantitative standpoint, there are ample units in the City to house the population. However, high home values and rents result in much of the housing stock being out of the affordable range for large portions of the population, especially elderly and disabled. Approximately 22.3 percent of the total population are severely cost burdened (severe housing cost burden is defined as greater than 50% of income), pointing to a disconnect between the housing supply and residents' income. (Data Source: HUD Table 10 - Demographics of Households with Severe Housing Cost Burden)

For disability access in public housing developments, WHA plans to increase housing access targeted towards the elderly and disabled. WHA will facilitate participation in programs that enhance their physical, social and mental well-being. WHA will also provide general assistance and advocacy related to supportive and social services.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

The majority of the public housing developments, LIHTC and Project Based Section 8 housing are located in R/ECAP tracts, or in close proximity in the northwest areas of the City. These are also tracts with a concentration of Blacks. (HUD Map 5)

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

WHA has moved to address access to all types of disabled persons in Wilmington by providing affirmative measures to provide access for these individuals in the City.

As part of WHA's Annual Plan beginning 2016, one of the HUD strategic goals is to Ensure Equal Opportunity in Housing for all Americans. Under this goal, the PHA will undertake affirmative measures to ensure access to assisted housing to all protected classes, including disabled persons, which meet eligible guidelines. WHA will also undertake affirmative measures to provide a suitable living environment for all families living in assisted housing, including reasonable accommodations for persons with a disability, which meet eligible guidelines. Specifically for disabled persons, WHA will undertake affirmative measures to ensure accessible housing to persons with all types of disabilities regardless of unit size requirement. (Source: WHA 2016 Annual Plan)

Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

According to HUD Map 16 – Disability by Type, there is a large number of persons with a disability located in R/ECAP tracts and/or areas where there is high segregation in Wilmington. The 2010-2014 ACS confirms these findings as areas with a higher concentration of disabled persons than the rest of the City. These R/ECAP tracts are where Blacks have the highest concentration in the City, with 90.9 percent in Census Tract 37129011100 (along Dawson St.), 73.6 percent in Census Tract 37129010100 and 37129011400 (north of Market St./Hwy 17). (Source: 2010-2014 ACS via PolicyMap)

The City has taken steps to further the actions of improving access for residents with a

disability, and supports efforts to expand where these individuals may be able to reside. To further this, the City adheres to the Americans with Disabilities Act (ADA), which states that the City will not discriminate on the basis of disability in the admission or access to employment, programs and activities. All contents on the City's website can also be made accessible to those with disabilities if it does not impose undue burden on the City. A City ADA compliance officer can be contacted for all concerns and violations concerning the provision of the ADA and rights of those with a disability.

AFH Map 14 – Percent of Persons with a Disability – Concentration (See Appendix)

AFH Map 14 – Percent of Persons with a Disability – Concentration shows the concentration of persons with a disability in Wilmington. According to the 2010-2014 ACS 5 Year Estimates, Wilmington had 14,428 persons with a disability – making this group 13.2 percent of the population. A concentration is defined as 10% or more than the citywide rate for persons with a disability – meaning an area with 23.2 percent or more as disabled. As mentioned above this R/ECAP tract has been identified as a tract with a concentration of Blacks (Census Tract 37129011100) with 90.9 percent of the population as this race group (2010-2014 ACS via PolicyMap).

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

At this time, approximately 29.7 percent of residents using public housing have a disability (263 persons) across all developments in Wilmington. WHA provides access to public housing, programs and activities available to all protected classes, including persons who are disabled.

The HCV program has 26.3 percent, which were with a disability (357 persons) in Wilmington. Project-based Section 8 has 9.8 percent (95 persons) and Other HUD Multifamily sites had just 7 percent – 11 persons with a disability. While Public Housing has concentrations in R/ECAP tracts, Project-based Section 8 and Other HUD Multifamily sites are scattered across the City. (Data Source: HUD Table 15 - Disability by Publicly Supported Housing Program Category, HUD Map 5)

Since the 2010 census data was published, the Wilmington Housing Authority and its instrumentality, Housing and Economic Opportunities, Inc., have added 35 new public housing units for disabled persons through the Low Income Housing Tax Credit program and the Supportive Housing Development Program of the North Carolina Housing Finance Agency.

Additionally, a new 8 unit supportive housing apartment, Pearce House, is currently under construction in the Southside R/ECAP. WHA has partnered with Elderhaus, Inc. to provide supportive services for the residents of this new apartment due for completion by early 2017.

AFH Table 5 – WHA Property Listing (See Appendix)

City HOME funds will be used to leverage NCHFA funding and other financing for the development of Lakeside Reserve. Phase 1 of this project includes 16 of the 48-unit project to provide permanent supportive housing for formerly homeless disabled persons.

4 Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:

i. Government services and facilities

Access to Government Services

The City of Wilmington has an ADA policy and has issued a notice that the City will not discriminate against qualified individuals with disabilities on the basis of any disability in the City's services, programs or activities.

Access to Facilities

The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited. However, there may be times where an individual may require auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity. In this case, there persons should contact the office of the ADA Coordinator (910-341-5879).

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

At present, according to the City's Code of Ordinances, which can be found online through a link on its website, the City enforces public sidewalks, pedestrian crossings and signals in compliance with the American With Disabilities Act. Sidewalks for pedestrians must have five (5) feet of unobstructed width (no poles, lighting, signs and trees etc, unless there is a tree grate) and must have an acceptable smooth and level surface for passage.

Any Mixed Use District, areas which are intended to provide an alternative to the predominant development pattern in Wilmington and areas with access for residential developments isolated from places to work and shop must also have common spaces and sidewalks in compliance with the ADA.

iii. Transportation

Transportation for persons with a disability can become an issue if there is not adequate accessibility. For private transportation, the cost increased dramatically as vehicles may be required to be outfitted to accommodate persons with disabilities – making this an option many disabled persons with limited income can afford. For those who do not have a means of private transportation, there is Paratransit Services offered by Wave Transit in the City.

Wave Transit is available to help individuals with disabilities take advantage of the independence and flexibility that is provided by the transit system by offering several paratransit programs. Regular fixed route and shuttle services for seniors and persons with disabilities are accessible for a reduced fare. Service animals are allowed on all Wave vehicles. In addition to fixed routes, complementary paratransit service for those who live within $\frac{3}{4}$ mile of a fixed route is available. Complementary paratransit service is also available through Wave Transit's Elderly and Disabled Transportation Assistance Program. Travel training, which provides elderly and persons with a disability one-on-one training on how to access and use Wave Transit services is also available.

iv. Proficient schools and educational programs

Persons with a disability had a higher concentration in the northwest area of Wilmington. The northwest area of the City was also the area furthest away from high performing schools according to GreatSchools. (Source: 2010-2014 ACS via PolicyMap)

For access in the schools, Wilmington falls within the New Hanover County School System, which is in compliance with Federal law, including Section 504 of the 1973 Rehabilitation Act and the provisions of Title IX of the Education Amendments of 1972. New Hanover County Schools administers all state-operated educational programs, employment activities, and admissions without discrimination for all protected groups including persons with a disability except where exemption is appropriate and allowed by law.

If any individual should be discriminated against, they can file a complaint of discrimination with the Deputy Superintendent, Student Support and Federal Programs who can be reached at: 6410 Carolina Beach Road, Wilmington, NC 28412, Telephone (910) 254-4206

v. Jobs

The City of Wilmington is an Equal Opportunity Employer and enforces the Equal opportunity and supports the accommodation provisions of the ADA, which protects persons with a disability who may be seeking a job. The City also understands that reasonable accommodations may be necessary to enable qualified individuals with disabilities to perform their jobs. If any person with a disability is selected for an interview and need an accommodation to participate, they are welcome to contact the Human Resources Office at (910) 341-7840.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The City of Wilmington is in full compliance with the Americans With Disabilities Act (ADA). The City does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs or activities.

The City ADA Coordinator, has been designated by the City Manager to coordinate with the non-discrimination requirements contained in Section 35.130 of the Department of Justice Regulations. Furthermore, a **City ADA Compliance Officer**, has been designated by the City Manager to review complaints regarding the City's ADA programs and accessibility. Both the City ADA Coordinator and Compliance Officer may be contacted through the City Manager's Office at City Hall, 102 North 3rd Street, PO Box 1810, Wilmington, NC or by telephone (910) 341-7810.

For website accessibility, the City recognizes the importance of making the website accessible to everybody, regardless of their level of ability or disability, and is also committed to providing access for persons with a disability. Under reasonable accommodations, all information on the website can be made available in an alternative format and/or arrangements can be made by the City's ADA Coordinator to meet the needs of the individual.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

Persons with a disability in Wilmington face the difficulty of purchasing homes that must be brought up to applicable codes by the City or the American Disabilities Act, which may also add to the cost of purchasing or owning a home. According to the 2010-2014 ACS, for working

individuals, persons with a disability have a median income of \$15,397 in comparison to persons with no disability with \$23,501 – more than a third less. Over a third of homeowners with a mortgage already experience being cost burdened (36.7%), and cost burden increases as median income decreases. (Source: 2010-2014 ACS 5-Year Estimates DP04, S1811)

The challenges of homeownership encountered by individuals with a disability are compounded when those individuals are also living in poverty. AFH Map 15 – Percent of People Living in Poverty with a Disability uses ACS 2010-2014 data to show the population living in poverty with a disability. In the northwest part of the City and R/ECAP tracts, more than 25% of the population living in poverty also has a disability. In these areas, homeownership is virtually out of reach for these individuals.

AFH Map 15 – Percent of People Living in Poverty with a Disability (See Appendix)

Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

The City recognizes it needs to respond to the critical needs of disabled individuals to promote self-sufficiency and independent living opportunities. For those already living in homes, upkeep can become an issue. To examine this issue, an estimate of the number of persons by disability type is an important indicator to determine housing needs. AFH Table 6 – Disability Characteristics in Wilmington displays the number of persons in the City by disability type.

AFH Table 6 – Disability Characteristics in Wilmington (See Appendix)

According to the 2010-2014 ACS, of the 14,428 persons with any disability in the City (13.2% of the total population). Disabled persons with an ambulatory difficulty are highest with 52.1%, followed by disabled persons with cognitive difficulty with 38.3%, and then 32.4% are with an independent living difficulty. There are also 17.1% with self-care difficulty, 27.1% with a hearing difficulty and 17.6% with vision difficulty who may require accommodations to allow these persons to live independently or with family in homes.

Regardless of the level of difficulty of each disability, which can vary and may also require a variety of accommodations, HUD requires those involved in the provisions of housing and lending transactions to comply with the Fair Housing Act's reasonable accommodation requirements as published in HUD's *Reasonable Accommodations Guidance*. As such, the Act defines a person with a disability to include (1) individuals with a physical or mental impairment that substantially limits one or more major life activities; (2) individuals who are regarded as having such an impairment; and (3) individuals with a record of such an impairment. (Source: HUD)

Disproportionate Housing Need - Affordability

Of the population 16 years and over, there are 7,316 with any disability, and only 31.5% are employed in Wilmington. Those employed with any disability were estimated to have a median earning of \$15,397, which was lower than those with no disability with \$23,501 – a difference of a third less. (Source: 2010-2014 ACS 5-Year Estimates)

Approximately 36.7% of homeowners with a mortgage in the City are housing cost burdened (meaning 30% or more of their income go towards housing costs). With disabled workers

earning less than persons with no disability, finding affordable housing that is suitable for their needs becomes pertinent. (Data Source: 2010-2014 ACS 5-Year Estimates)

According to the Disabled Resource Center (DRC), a local non-profit organization serving Wilmington and the surrounding region. Disabled persons seeking homeownership are challenged by credit problems and a lack of understanding about real estate/mortgage process. Furthermore, homeownership for disabled persons can be described as, "scary," and they need a support system to deal with life issues that can jeopardize homeownership such as the sudden loss of employment and cost of maintaining the home.

In general, persons with a disability have a disproportionate housing need due to housing costs being less affordable due to lower earnings.

6. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.**

Disabled persons face access issues in Wilmington as evident by the multitude of services offered to bridge gaps of services mentioned in this analysis, however when disabled persons are also elderly it brings forth a convergence of issues that must be addressed for them to continue to live independently or with family in the community.

Elderly 65 years and over experience a disability rate much higher than the general population citywide rate of disabled persons (13.2%). Approximately 38.8 percent of elderly were with a disability (2010-2014 ACS 5-Year Estimates - S1810) – almost three times as high.

AFH Map 16 – Percent of People 65 and Older with a Disability (See Appendix)

At this time there are no disproportionate disability and access issues in the City that may be affecting minority groups, except for American Indian and Alaska Natives. The disability rate for the City as a whole was 13.2 percent, and American Indian and Alaska Natives had a disability rate of 37.1 percent – well above the citywide rate. Most minority groups were close to that rate or below, with only of note Blacks having an 18.4 percent disability rate – still within the HUD guidelines of not being a disproportionate concentration (HUD defines a concentration as a group having 10% or more of the average rate). Approximately 11.9 percent of Whites and 14.2 percent of Asians were with a disability. Ethnic Hispanics were with only 4.3 percent with any disability (2010-2014 ACS – S1810).

- b. **The program participant may also describe other information relevant to its assessment of disability and access issues.**

Trillium Health Resources (THR)

Housing and access efforts for persons with a disability in Wilmington is headed by Trillium Health Resources (THR), which is a governmental agency that manages mental health, substance use and intellectual/developmental disability services in a 24-county area in eastern North Carolina. THR manages state and federally funded services for people who receive Medicaid, are uninsured or cannot afford services. While the agency does not help individuals

directly, they offer a Provider Network for persons who need services and assistance to the appropriate agencies and licensed therapist.

THR also collaborates with local non-profits, other government agencies, healthcare providers and hospitals to provide comprehensive patient care for individuals and their specific needs. The mission of THR is to transform the lives of people in need by providing them with ready access to quality care.

Disability Resource Center (DRC)

DRC provides services to disabled individuals and households to assist in accessing services including, but not limited to, affordable accessible housing. According to DRC staff their clients routinely experience problems finding affordable housing and face housing discrimination, especially when requesting reasonable accommodations.

Persons seeking assistance from DRC are often in the early stages of deterioration of health and not old enough to retire and receive Social Security. DRC serves over 288 persons with independent living plans in a 5 county service area, with 75 percent having housing needs. DRC also gets contacted from people living outside of the City who request to be relocated into Wilmington to be closer to access to medical care and other services.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- **Lack of affordable, integrated housing for individuals who need supportive services**
- **Access to publicly supported housing for persons with disabilities**
- **Lack of assistance for housing accessibility modifications**

Access to Proficient Schools for persons with disabilities

While persons with a disability have access and are protected in New Hannover County School District schools, high performing schools remain out of reach for many of the City's disabled population. Persons with a disability had a higher concentration in the northwest area of Wilmington. The northwest area of the City was also the area furthest away from high performing schools according to GreatSchools. (Source: 2010-2014 ACS via PolicyMap)

Lack of affordable housing for individuals who need supportive services

Generally, older homes do not accommodate as well for persons who are disabled – due to housing that has not been adequately adapted to their needs. According to the 2010-2014 ACS, 32.9 percent of the housing units in the City were built before 1970 – or 17,868 homes that are older than 45 years. AFH Map 17 – Median Year Housing Unit was Built, shows the estimated age of the housing stock. The lightest shaded areas represent homes that were built before 1970; the darkest shaded areas have homes that, on average, were built since 2000.

AFH Map 17 – Median Year Housing Unit was Built (See Appendix)

The areas with the oldest housing overlap with the R/ECAP tracts. Many of these areas also have a high concentration of people living with a disability.

Access to publicly supported housing for persons with disabilities

Persons with a disability face a long wait time for access into publicly supported housing. As of 2016, WHA administers both Public Housing and Section 8, however there was a long waiting list for publicly supported housing in the City. For Section 8, there were 477 families on the waiting list of which 7 percent were with a disability – 35 households. The Public Housing developments for the WHA each had a waiting list as well with 255 families at Hillcrest, 93 at Houston Moore, 184 at Vesta Village, 81 at Solomon Towers, 195 at Rankin Terrace, 127 at Creekwood, 87 at Creekwood South, 149 at Woodbridge, 50 at New Brooklyn Homes, 107 at Eastbrook, and 28 at Southside – for a total of 1,356 families on the waiting list for Public Housing. While not a direct comparison, HUD provided PHA data figures indicated that 25.9 percent of public housing developments in R/ECAP and 33 percent in R/ECAP tracts were with a disability.

WHA plans to target available assistance to families with disabilities by applying for special purpose vouchers targeted to families with disabilities as they become available and affirmatively market to local nonprofit agencies that assist families with disabilities to enhance the scope of services offered. WHA has an admissions preference for working families and those unable to work because of age or disability. (Source: WHA 2016 Annual Plan)

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Currently there are no outstanding fair housing complaints against the City or Housing Authority. According to data from HUD and the North Carolina Human Relations Commission, 59 have been filed against various other parties in New Hanover County since the beginning of 2006. There is no clear pattern over time, other than a dip in 2012-15 when there was only one filing each year. Of particular note is the high percentage of disability-related cases, accounting for nearly half. This is twice the rate statewide (based on a different period of years, but enough to be representative). The offsets were in race and familial status claims.

AFH Table 7 – Basis for Discrimination Complaint (See Appendix)

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

There is no local ordinance related to fair housing protections. The state does have a statute, including a provision prohibiting discrimination in land-use or permitting decisions based on a development containing “affordable housing units for families or individuals with incomes below eighty percent (80%) of area median income.” Such a protection is unique in the nation among state fair housing laws. The law exempts decisions based on limiting “high concentrations of affordable housing.” To date no party has enforced the provision in court, but based on anecdotal accounts it has been used by developers to secure rezoning and other approvals.

Under the North Carolina Fair Housing Act of 1983¹:

(a) It is an unlawful discriminatory housing practice for any person in a real estate transaction, because of race, color, religion, sex, national origin, handicapping condition, or familial status to:

(1) Refuse to engage in a real estate transaction;

(2) Discriminate against a person in the terms, conditions, or privileges of a real estate transaction or in the furnishing of facilities or services in connection therewith;

(2a)- (2c) Repealed by Session Laws [2009-388, s. 1](#), effective October 1, 2009. (3) Refuse to receive or fail to transmit a bona fide offer to engage in a real estate transaction;

(4) Refuse to negotiate for a real estate transaction;

(5) Represent to a person that real property is not available for inspection, sale, rental, or lease when in fact it is so available, or fail to bring a property listing to his attention, or refuse to permit him to inspect real property;

(6) Make, print, circulate, post, or mail or cause to be so published a statement, advertisement, or sign, or use a form or application for a real estate transaction, or make a record or inquiry in connection with a prospective real estate transaction, which indicates directly or indirectly, an intent to make a limitation, specification, or discrimination with

¹ Source: North Carolina State Fair Housing Act, Chapter 41A, 1983

respect thereto;

(7) Offer, solicit, accept, use, or retain a listing of real property with the understanding that any person may be discriminated against in a real estate transaction or in the furnishing of facilities or services in connection therewith; or

(8) Otherwise make unavailable or deny housing.

(b1) It is an unlawful discriminatory housing practice for any person or other entity whose business includes engaging in residential real estate related transactions to discriminate against any person in making available such a transaction, or in the terms and conditions of such a transaction, because of race, color, religion, sex, national origin, handicapping condition, or familial status. As used in this subsection, "residential real estate related transaction" means:

(1) The making or purchasing of loans or providing financial assistance (i) for purchasing, constructing, improving, repairing, or maintaining a dwelling, or (ii) where the security is residential real estate; or

(2) The selling, brokering, or appraising of residential real estate.

- The provisions of this subsection shall not prohibit any financial institution from using a loan application which inquiries into a person's financial and dependent obligations or from basing
- its actions on the income or financial abilities of any person.

(c) It is an unlawful discriminatory housing practice for a person to induce or attempt to induce another to enter into a real estate transaction from which such person may profit:

(1) By representing that a change has occurred, or may or will occur in the composition of the residents of the block, neighborhood, or area in which the real property is located with respect to race, color, religion, sex, national origin, handicapping condition, or familial status of the owners or occupants; or

(2) By representing that a change has resulted, or may or will result in the lowering of property values, an increase in criminal or antisocial behavior, or a decline in the quality of schools in the block, neighborhood, or area in which the real property is located.

(d) It is an unlawful discriminatory housing practice to deny any person who is otherwise qualified by State law access to or membership or participation in any real estate brokers' organization, multiple listing service, or other service, organization, or facility relating to the

business of engaging in real estate transactions, or to discriminate in the terms or conditions of such access, membership, or participation because of race, color, religion, sex, national origin, handicapping condition, or familial status.

(e) It is an unlawful discriminatory housing practice to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, on account of having exercised or enjoyed, or on account of having aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by this Chapter.

(f) It is an unlawful discriminatory housing practice to:

(1) Refuse to permit, at the expense of a handicapped person, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications are necessary to the handicapped person's full enjoyment of the premises; except that, in the case of a rental unit, the landlord may, where it is reasonable to do so, condition permission for modifications on agreement by the renter to restore the interior of the premises to the condition that existed before the modifications, reasonable wear and tear excepted.

(2) Refuse to make reasonable accommodations in rules, policies, practices, or services, when these accommodations may be necessary to a handicapped person's equal use and enjoyment of a dwelling.

(3) Fail to design and construct covered multifamily dwellings available for first occupancy after March 13, 1991, so that:

- a. The dwellings have at least one building entrance on an accessible route, unless it is impractical to do so because of terrain or unusual site characteristics; or
- b. With respect to dwellings with a building entrance on an accessible route:
 1. The public and common use portions are readily accessible to and usable by handicapped persons;
 2. There is an accessible route into and through all dwellings and units;
 3. All doors designed to allow passage into, within, and through these dwellings and individual units are wide enough for wheelchairs;
 4. Light switches, electrical switches, electrical outlets, thermostats, and other environmental controls are in accessible locations;
 5. Bathroom walls are reinforced to allow later installation of grab bars; and
 6. Kitchens and bathrooms have space for an individual in a wheelchair to maneuver.

(g) It is an unlawful discriminatory housing practice to discriminate in land-use decisions or in

the permitting of development based on race, color, religion, sex, national origin, handicapping condition, familial status, or, 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 eighty percent (80%) of area median income. It is not a violation of this Chapter if land-use decisions or permitting of development is based on considerations of limiting high concentrations of affordable housing.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Other than the City of Wilmington, the following local and regional partner agencies and organizations provide fair housing information, outreach and enforcement to the City:

Wilmington Housing Authority: Administers the Public Housing program and the Housing Choice Voucher program (Section 8) in the City and adheres to federal and local fair housing laws and ADA requirements.

Brunswick Housing Opportunities: Connects people to preparation, resources, and opportunities that raise the level of economic security, increase financial resiliency, and improve the health and well being of individuals and communities. BHO also promotes home safety and repair through their Home SAFE program.

Pender County Housing Department: PCHD is a local PHA neighboring the City of Wilmington and administers Section 8 in the Pender County and adheres to federal and local fair housing laws including ADA requirements.

Cape Fear Regional CDC: The CDC is a non-profit housing, community and economic development organization. Its mission is to provide information, education and counseling related to home ownership and entrepreneurship to low and moderate income residents in the region and facilitate community and economic development programs in cooperation with other community organizations and local government agencies.

Catholic Charities Cape Fear: CC offers programs that aim to educate individuals and families on how to solve financial problems and gain personal financial management skills.

AMEZ Housing: AMEZ is a local nonprofit that focuses on community development.

Cape Fear Habitat for Humanity: Habitat is a nonprofit devoted to building simple, decent and affordable housing.

Cape Fear Land Trust: CLT is a nonprofit corporation that develops and promotes affordable housing, community gardens, civic buildings, commercial spaces and other community assets on behalf of the community. CLT balances the needs of individuals to access land and maintain security of tenure with a community's need to maintain affordability, economic diversity and local access to essential services.

4. Additional Information

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.**

Unlike five other North Carolina jurisdictions (Charlotte/Mecklenburg County, Durham, Greensboro, Orange County, and Winston-Salem), there is no local public entity certified as a Fair Housing Assistance Program authorized to enforce fair housing. To the best of the program participants' knowledge, no private entity or nonprofit organization in the area is currently carrying out testing or other similar activities.

Among other responsibilities, the North Carolina Human Relations Commission facilitates the resolution of fair housing complaints, creates public awareness of anti-discrimination laws, and promotes equal housing opportunities. The Commission resolves complaints of housing discrimination made by private persons. In accordance with the federal and state Fair Housing Acts, staff receives, investigates, conciliates, and litigates claims of discrimination related to housing transactions on behalf of private persons. HUD certified the Commission as a substantially equivalent agency in 1990.

The complaint form is available at:

<http://ncadmin.nc.gov/document/housing-discrimination-complaint-form>

There also is private activity at the state level. The Fair Housing Project of Legal Aid of North Carolina represents victims of housing discrimination, conducts testing, and provides training to tenants, community groups, landlords, property managers, and other housing providers. According to their website:

- As a part of Legal Aid of North Carolina (LANC), the Fair Housing Project provides legal

representation, advice, referrals, and information to individuals statewide who have experienced housing discrimination. Legal services are provided both through local LANC offices as well as through the Project's full-time staff.

- Fair housing trainings and educational seminars conducted by the Project target renters and homebuyers; people with disabilities and their service providers; local governments, housing developers, property managers, and other housing providers; Spanish-speakers; and attorneys and housing professionals who represent individuals in mortgage and foreclosure-related matters.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The 2016 – 2017 HOME and CDBG Action Plan listed the following activities:

- Continue to maintain Fair Housing Website,
<http://www.wilmingtonnc.gov/home/showdocument?id=752>
- Continue to produce and distribute brochures, flyers and other material throughout the community and at community events,
- Continue monthly homebuyer education classes and real estate professional education classes,
- Sponsor, in partnership with New Hanover County and Cape Fear Housing Coalition,
- NC Justice Center Fair Housing Workshop for community-based organizations and other stakeholders,
- Maintain HUD certification for City Housing Financial Counselors,
- Continue to monitor affordability period to ensure compliance.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- **Lack of local private fair housing outreach and enforcement**
- **Lack of local public fair housing enforcement**
- **Lack of resources for fair housing agencies and organizations**

The lack of local private or public fair housing enforcement and resources for fair housing agencies/organizations are significant contributing factors. Residents with complaints are unable to work with someone locally; those aggrieved are disproportionately low-income with limited time and access to means of long-distance travel or communication. Furthermore, officials in Raleigh (state) or Atlanta (federal) may not have the resources to conduct on-site investigations, making it more difficult to prove violations.

Conversely, there is a state fair housing law, including a unique provision regarding project siting. Given the extent of the North Carolina statute, the absence of a local ordinance specifically addressing fair housing is not a significant factor.

There are no unresolved violations of fair housing or civil rights law against the program participants.

VI. Fair Housing Goals and Priorities

- 1) For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.**

Through the process of this Assessment of Fair Housing, and described in Section V of this report, the following Fair Housing Issues have been identified within the City Wilmington: Segregation, Racial and Ethnic Concentrations of Poverty, Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing Location and Occupancy, Disability and Access Issues, as well as Fair Housing Enforcement, Outreach Capacity and Resources. For each Fair Housing Issue, the associated Contributing Factors, identified in this Assessment, are prioritized by degree of impact on the particular Fair Housing Issue – the highest ranking Contributing Factor thus contributing the most towards the Fair Housing Issue. Overall, the highest priority of all the Contributing Factor is the Location and Type of Affordable Housing which is overwhelmingly the leading factor contributing to Segregation and Racial and Ethnic Concentrations of Poverty within Wilmington. Community Opposition and Land Use & Zoning Laws also contribute to multiple Fair Housing Issues including Segregation, Racial and Ethnic Concentrations of Poverty as well as Disproportionate Housing Needs. Equally as important, the Lack of Public Investments and the Lack of Local Fair Housing Enforcement also contribute to multiple Fair Housing Issues.

Contributing Factors of Segregation

- 1) Location and Type of Affordable Housing
- 2) Community Opposition (NIMBY)
- 3) Displacement of Residents Due to Economic Pressure
- 4) Land Use and Zoning Laws
- 5) Occupancy Codes & Restrictions
- 6) Lending Discrimination

Contributing Factors of R/ECAPs

- 1) Location and Type of Affordable Housing
- 2) Community Opposition
- 3) Displacement of Residents Due to Economic Pressure
- 4) Private Discrimination

- 5) Deteriorated and abandoned properties

Contributing Factors of Disparities in Access to Opportunity

- 1) The availability, type, frequency, and reliability of public transportation
- 2) The location of proficient schools and school assignment policies
- 3) Lending Discrimination

Contributing Factors of Disproportionate Housing Needs

- 1) Displacement of Residents Due to Economic Pressure
- 2) Land Use and Zoning Laws
- 3) Lending Discrimination

Contributing Factors of Publicly Supported Housing Location and Occupancy

- 1) Community Opposition (NIMBY)
- 2) Impediments to Mobility
- 3) Lack of public investments in specific neighborhoods

Disability and Access Issues Contributing Factors

- 1) Lack of affordable, integrated housing for individuals who need supportive services
- 2) Access to publicly supported affordable housing for persons with disabilities
- 3) Lack of assistance for housing accessibility modifications

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

- 1) Lack of local private fair housing outreach and enforcement
- 2) Lack of local public fair housing enforcement
- 3) Lack of resources for fair housing agencies and organizations

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

| <u>Goal #1</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| Increase Affordable Housing Options | Community Opposition; Displacement of Residents Due to Economic Pressure; Location and Type of Affordable Housing; Private Discrimination | Segregation; R/ECAPS; Disparities in Access to Opportunity; Publicly Supported Housing | Increase in Affordable Housing Production; Reduction in Cost Burdened Households | City of Wilmington, Wilmington Housing Authority |
| | | | Support affordable housing developers, whenever possible in accordance with HOME underwriting requirements provide gap financing or when appropriate to assist with tax exempt bond issuance under Public Housing general statutes, in construction of new units of rental housing over the next 5 years; such apartments will be affordable to and occupied by households at 80% or less of area median income; thereby, reducing cost burden. | |

| <u>Goal #2</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------|
| Maintain Existing Affordable Housing | Community Opposition; Displacement of Residents Due to Economic Pressure; Location and Type of Affordable Housing; Private Discrimination | Segregation; R/ECAPS; Disparities in Access to Opportunity; Publicly Supported Housing | Housing Units Rehabilitated | City of Wilmington |
| | | | Substantially rehabilitate and/or repair an average of 10 owner occupied houses per year | |

| <u>Goal #3</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Increase Local Housing Enforcement Efforts | Community Opposition; Displacement of Residents Due to Economic Pressure; Location and Type of Affordable Housing; Private Discrimination | R/ECAPS; Disability and Access Issues; Fair Housing Enforcement | Increase in fair housing funding; Increase in number of fair housing workshops; Increase in fair housing supportive services | City of Wilmington, Wilmington Housing Authority |
| | | | Support CF Housing Coalition to apply for FHAP or FHIP to establish a local Fair Housing Initiative to monitor fair housing issues and complaints, provide funding to assist with FHIP application through biennial RFP process; hold at least one fair housing workshop for landlords and real estate agents annually; work in collaboration with other agencies advocating for affordable and fair housing, such as the Cape Fear Housing Coalition, TriCounty Homeless Interagency Council, Disability Resource Center and others to | |

| | | | | |
|--|--|--|---------------------------------------------------|--|
| | | | increase awareness and educate about Fair Housing | |
|--|--|--|---------------------------------------------------|--|

| <u>Goal #4</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Reduce Housing Discrimination Based on Disabilities | Community Opposition; Displacement of Residents Due to Economic Pressure; Location and Type of Affordable Housing; Private Discrimination | R/ECAPs; Disability and Access Issues; Fair Housing Enforcement | Reduced Discrimination Claims; Increased Access to Integrated Affordable Housing | City of Wilmington, Wilmington Housing Authority |
| | | | conduct at least one workshop annually on fair housing for landlords, lenders, and housing managers to review housing for persons disabilities and reasonable accommodations; create working group of city/WHA staff, disability service providers, landlords, and advocates to discuss responses to recent cases of discrimination; 10% of affordable housing produced with CDBG and HOME participation over the next 5 years will be targeted for persons with disabilities. WHA will incorporate handicapped accessible units in all new properties. | |

| <u>Goal #5</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Expand & Improve Access to Funding Sources for Affordable Housing Development | Community Opposition; Displacement of Residents Due to Economic Pressure; Location and Type of Affordable Housing | Segregation; R/ECAPs; Disproportionate Housing Needs; Publicly Supported Housing; Disproportionate Housing Needs | Working in Collaboration with New Hanover County, private developers, banks, real estate professionals, housing advocates and affordable housing providers to identify attainable strategies to increase affordable housing throughout the city and region | City of Wilmington, Wilmington Housing Authority |
| | | | Present recommendations to City Council and New Hanover County Commission for action on recommended immediate, short-term and long-term strategies to increase affordable housing and reduce housing cost burden | |

| <u>Goal #6</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|---------------------------------------------|-----------------------------|----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Increase Homeownership Opportunities | | Segregation; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Needs; Fair Housing Enforcement | Increase Homeownership Rates - | City of Wilmington, Wilmington Housing Authority |
| | | | Partner with area banks to provide up to 10 mortgages annually, through the HOP program, to households at or below 80% AMI. WHA will enhance the existing HCV | |

| | | | | |
|--|--|--|------------------------------------------------------------------|--|
| | | | homeownership program to foster homeowner stability and success. | |
|--|--|--|------------------------------------------------------------------|--|

| <u>Goal #7</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| Improve Educational Supportive Services | The location of proficient schools and school assignment policies; lack of public investments in specific neighborhoods | Publicly Supported Housing Location and Occupancy; Disparities in Access to Opportunity | Increase enrollment in after school tutoring and youth mentoring programs by 5% over 5 year period | City of Wilmington, |
| | | | fund after school programs in R/ECAPs over the next 5 years. 75% of youth enrolled will increase scores on end of year test at 80% or more; 90% promotion to next grade level | |

| <u>Goal #8</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Improve Access to Employment Training Opportunities | The location of proficient schools and school assignment policies; lack of public investments in specific neighborhoods, Displacement of Residents Due to Economic Pressure | Publicly Supported Housing Location and Occupancy; Disparities in Access to Opportunity; Disproportionate Housing Needs | Support agencies providing job training programs. Refer public housing and HCV participants to employment training to promote self-sufficiency. | City of Wilmington, Wilmington Housing Authority |
| | | | At least 150 individuals enrolled annually in Job Training/Job Preparation/Placement program, including residents of R/ECAPs. | |

| <u>Goal #9</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| Improve Access to Employment Opportunities | Lack of public investments in specific neighborhoods, Displacement of Residents Due to Economic Pressure, The availability, type, frequency and reliability of public transportation | Publicly Supported Housing Location and Occupancy; Disparities in Access to Opportunity; Disproportionate Housing Needs | increase labor market participation rates in R/ECAPs | City of Wilmington |
| | | | Provide annual funding for youth employment program for at least 20 youth to secure employment and supportive services for future career preparation | |

| <u>Goal #10</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Improve Access to Public Transportation | The availability, type, frequency and reliability of public transportation; Impediments to mobility; Lack of public investments in specific neighborhoods | Disproportionate Housing Needs; Publicly Supported Housing Location and Occupancy; Disparities in Access to Opportunity | Participate in WAVE Transit Authority Planning process to advocate for improvements to bus stops and routes within the R/ECAPs | City of Wilmington, Wilmington Housing Authority |

| <u>Goal #11</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Improve Public Perception of Affordable Housing | Community opposition; Land use and zoning laws, Private discrimination; Lack of local private fair housing outreach and enforcement; Lack of local public fair housing enforcement; Lack of resources for fair housing agencies and organizations | Fair Housing Enforcement; Segregation; R/ECAPs; Disproportionate Housing Needs | Increase Fair Housing Marketing, Awareness and Education throughout the community; | City of Wilmington, Wilmington Housing Authority |
| | | | Host at least one fair housing event annually, host annual workshops with lenders, real estate professionals and landlords, Fair Housing promotional program annually | |

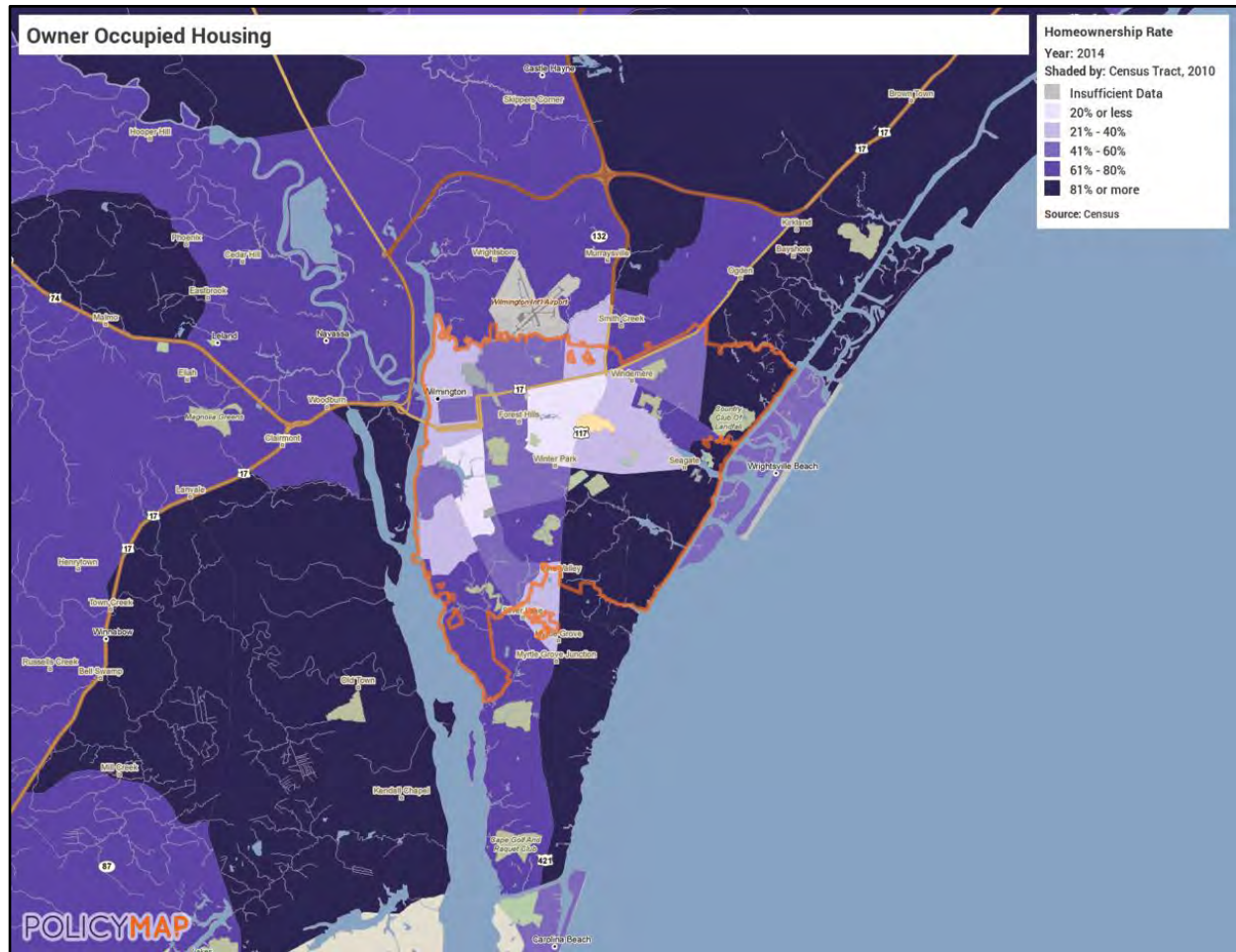
| <u>Goal #12</u> | <u>Contributing Factors</u> | <u>Fair Housing Issues</u> | <u>Metrics, Milestones, and Timeframe for Achievement</u> | <u>Responsible Program Participant(s)</u> |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| Improve Land Use and Planning Efforts | Land use and zoning laws, Occupancy codes & restrictions; location and type of affordable housing; Displacement of residents due to economic pressure | Fair Housing Enforcement; Segregation; R/ECAPs; Disproportionate Housing Needs | <p>City owned vacant land/in-fill lots should be offered to affordable housing developers at no cost for redevelopment into affordable housing. Review existing density bonus to identify ways to increase use, consult with developers for input into limitations and incentives to increase use. In accordance with the City’s Comprehensive Plan (policy 3.1.1) promote mixed-income neighborhoods throughout the city, to provide equitable access to opportunity and housing choice to households at all incomes.</p> <p>100% of available in-fill lots redeveloped into affordable housing. Revised density bonus utilized by developers 100% more than in past. Revise land development code to encourage mixed – use development and variety of housing types, prices, and tenures.</p> | City of Wilmington |

AFH Appendix

- 1. AFH Maps**
- 2. AFH Tables**
- 3. AFH Charts**

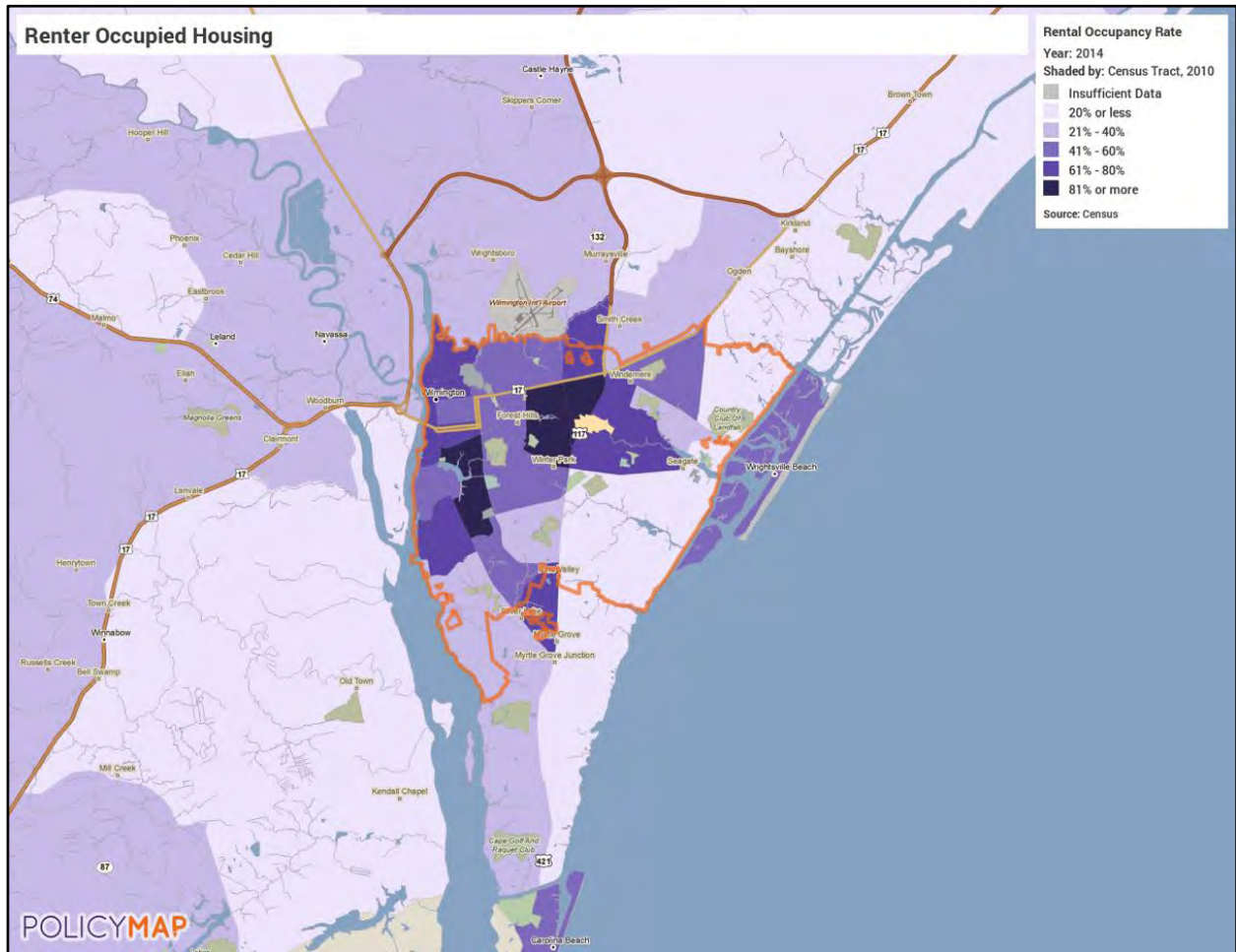
AFH Maps

AFH Map 1 – Owner-Occupied Housing (Section V – Fair Housing Analysis, Demographic Summary)



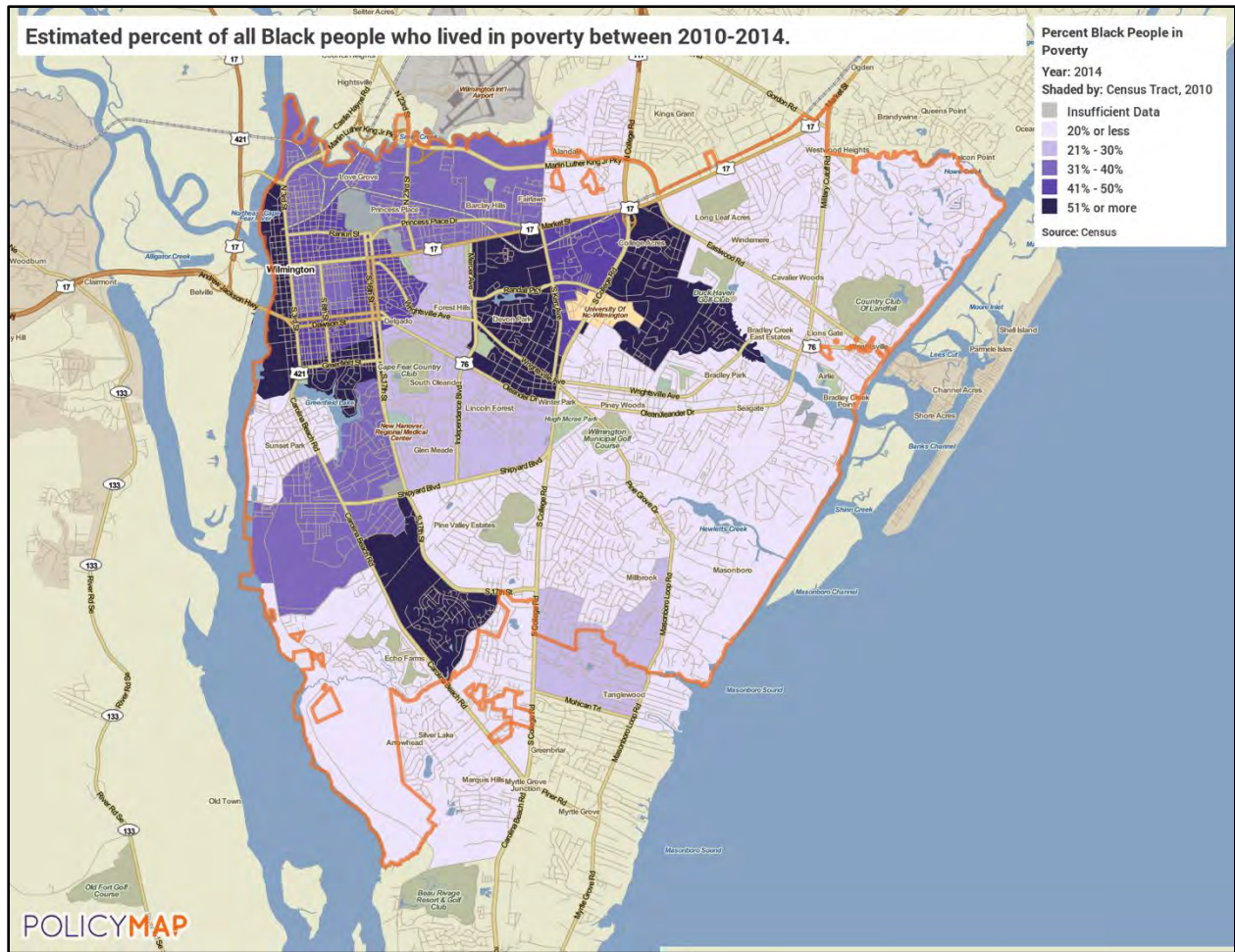
Source: American Community Survey 5-Year Estimates 2009-2014

AFH Map 2 – Renter Occupied Housing (Section V – Fair Housing Analysis, Demographic Summary)



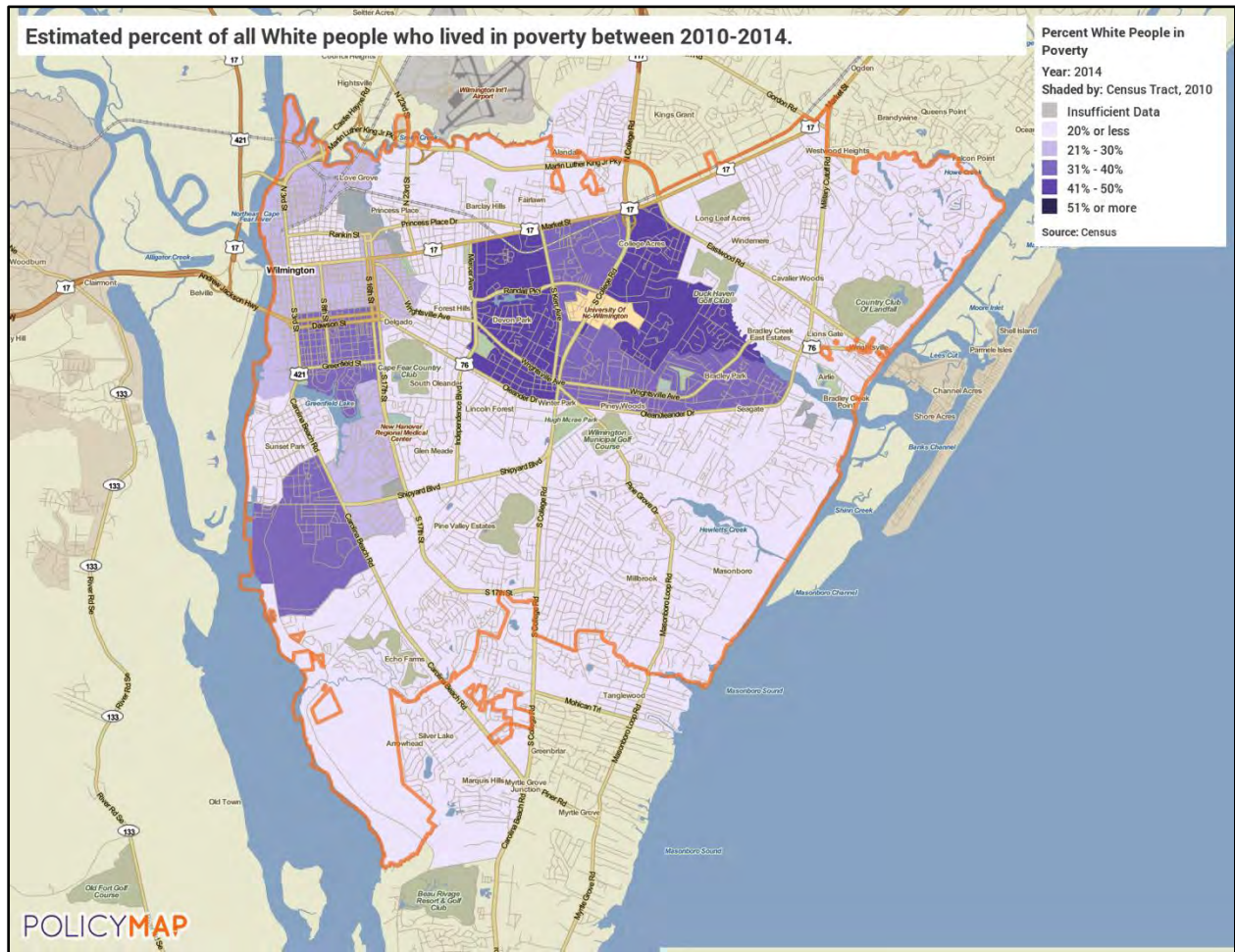
Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 3 – Percent of Blacks in Poverty
(Section V – Fair Housing Analysis, R/ECAPS, Additional Information)**



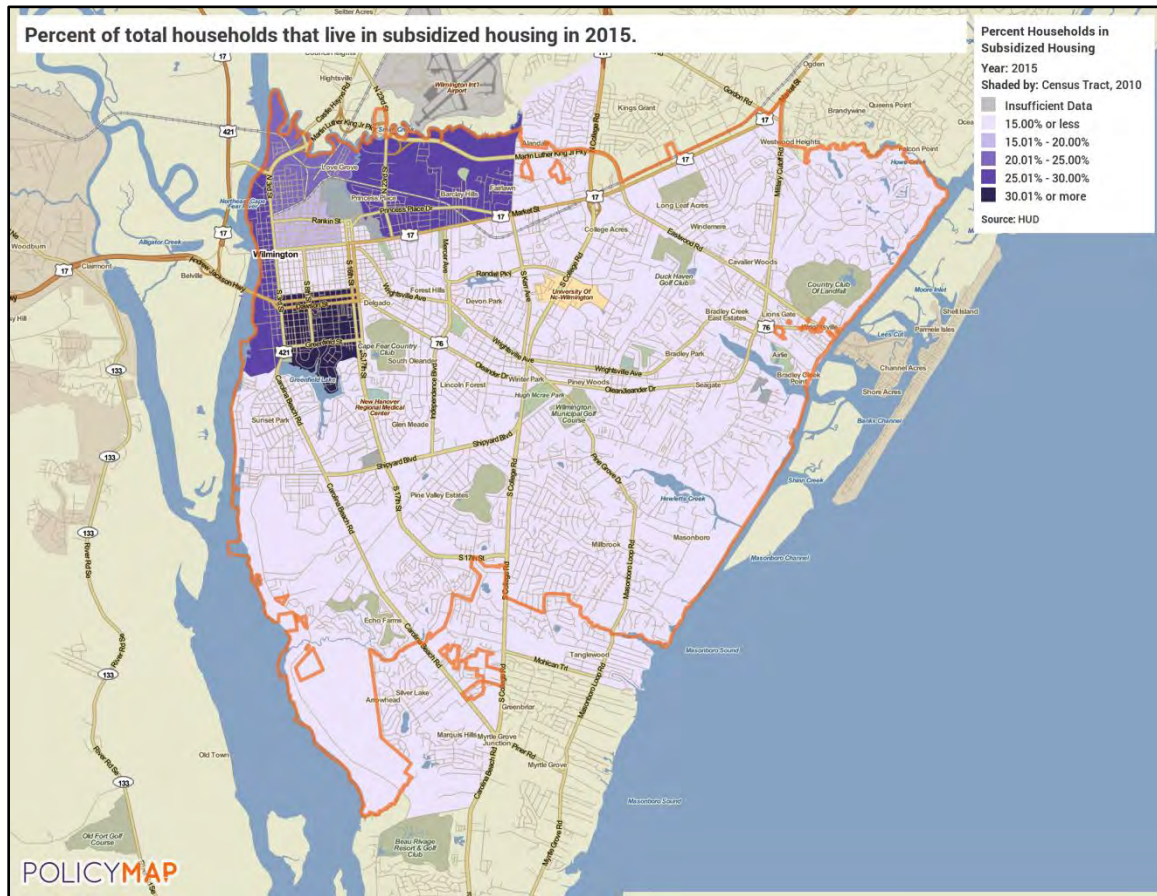
Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 4 – Percent of Whites in Poverty
(Section V – Fair Housing Analysis, R/ECAPS, Additional Information)**



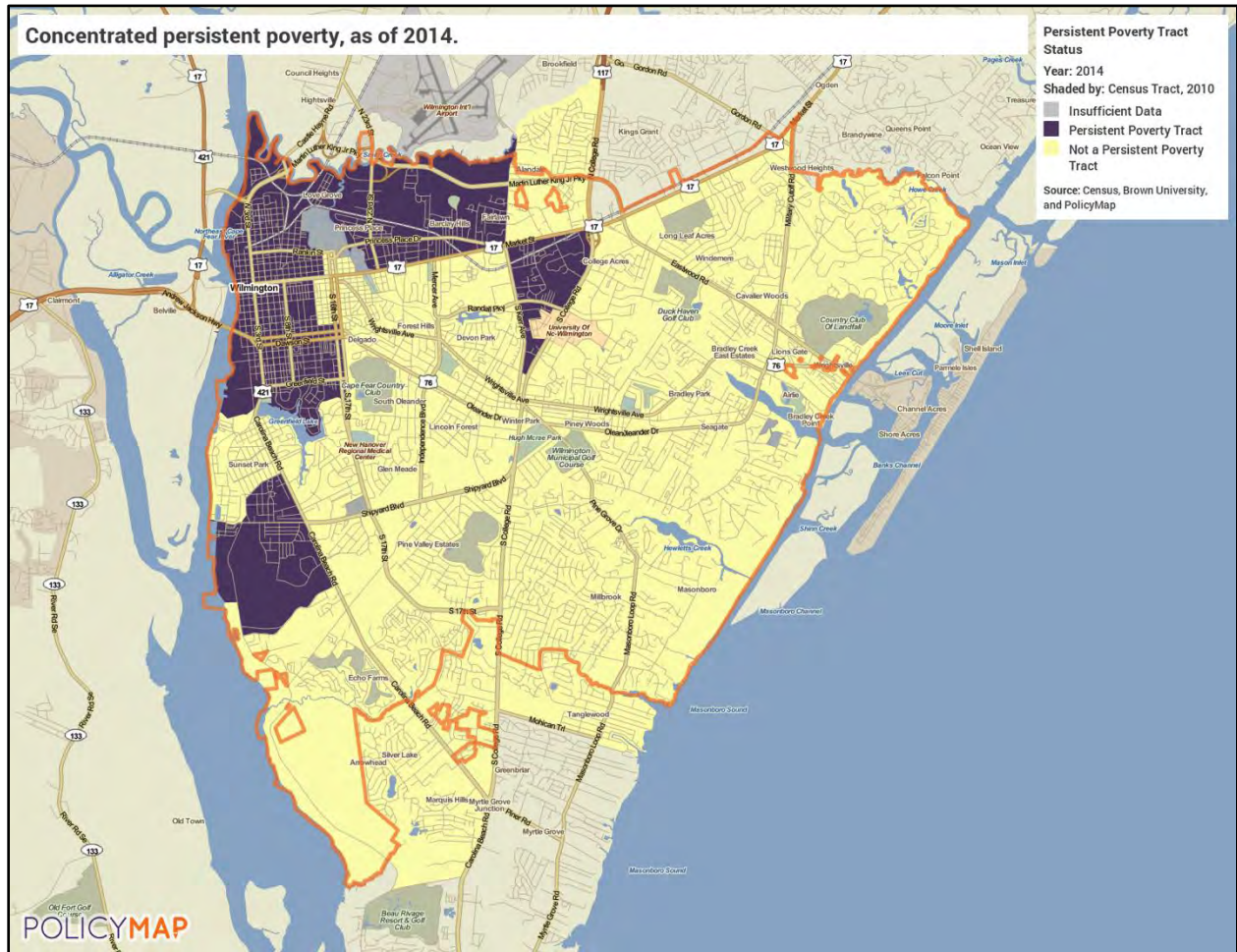
Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 5 – Percent of Total Households Living in Subsidized Housing
(Section V – Fair Housing Analysis, R/ECAPS, Additional Information)**



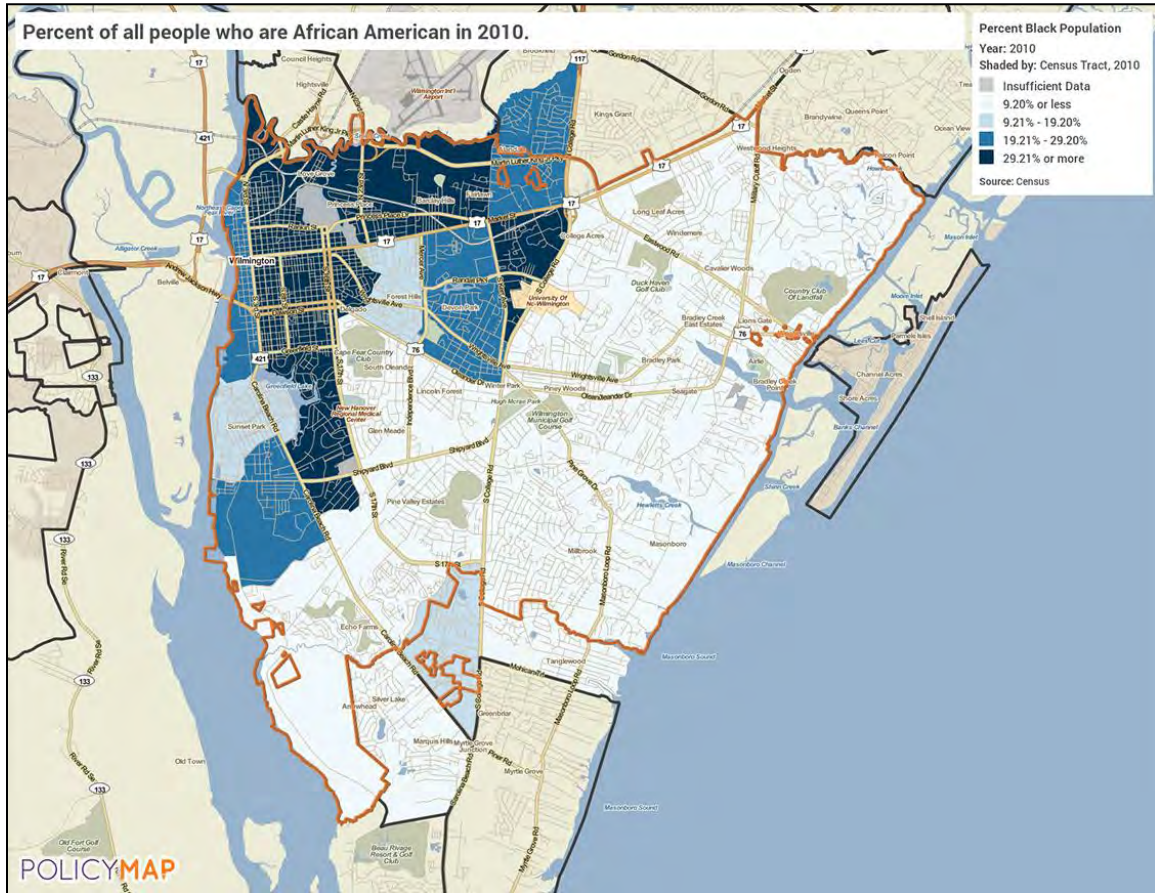
Source: American Community Survey 5-Year Estimates 2009-2014

AFH Map 6 – Concentrated Persistent Poverty
(Section V – Fair Housing Analysis, Disparities in Access to Opportunity, Low Exposure Opportunities)



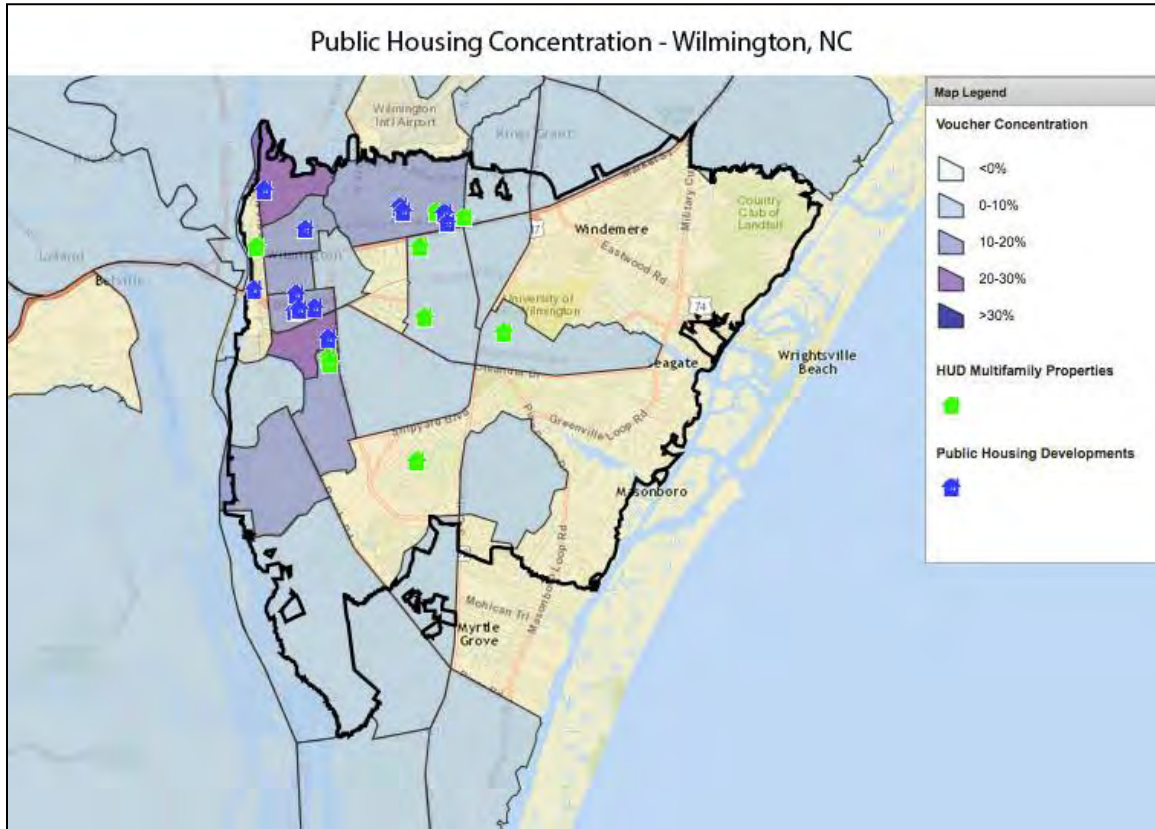
Source: American Community Survey 5-Year Estimates 2009-2014

AFH Map 7 – Percent of All People who are Black in 2010
(Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Location and Occupancy and Disparities in Access to Opportunity)



Source: American Community Survey 5-Year Estimates 2009-2014

AFH Map 8 – Public Housing Concentration
(Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Location and Occupancy and Disparities in Access to Opportunity)



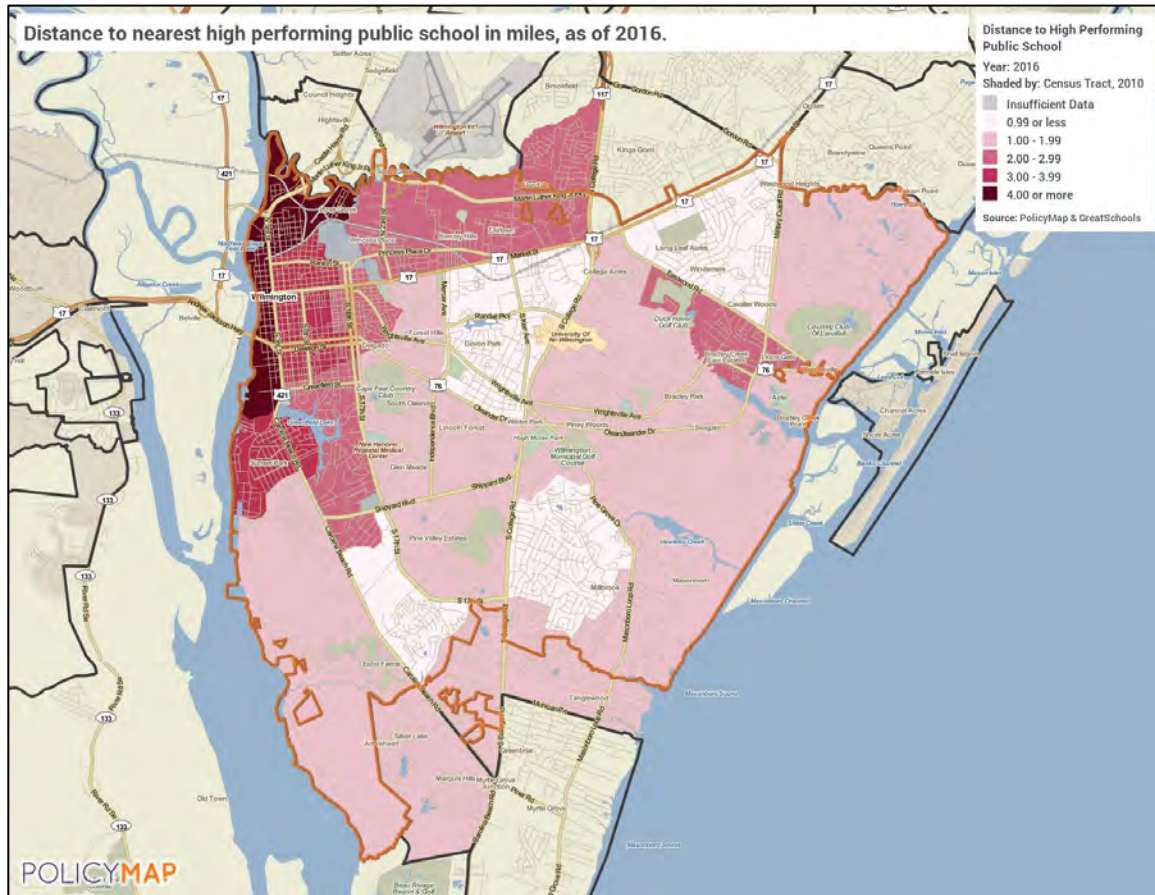
Source: American Community Survey 5-Year Estimates 2007-2011
 Data note: Most recent data from HUD CPD Maps

**AFH Map 9 – Percent of All People Living in Poverty
(Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Location and
Occupancy and Disparities in Access to Opportunity)**



Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 10 – Distance to High Performing School
(Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Location and
Occupancy and Disparities in Access to Opportunity)**

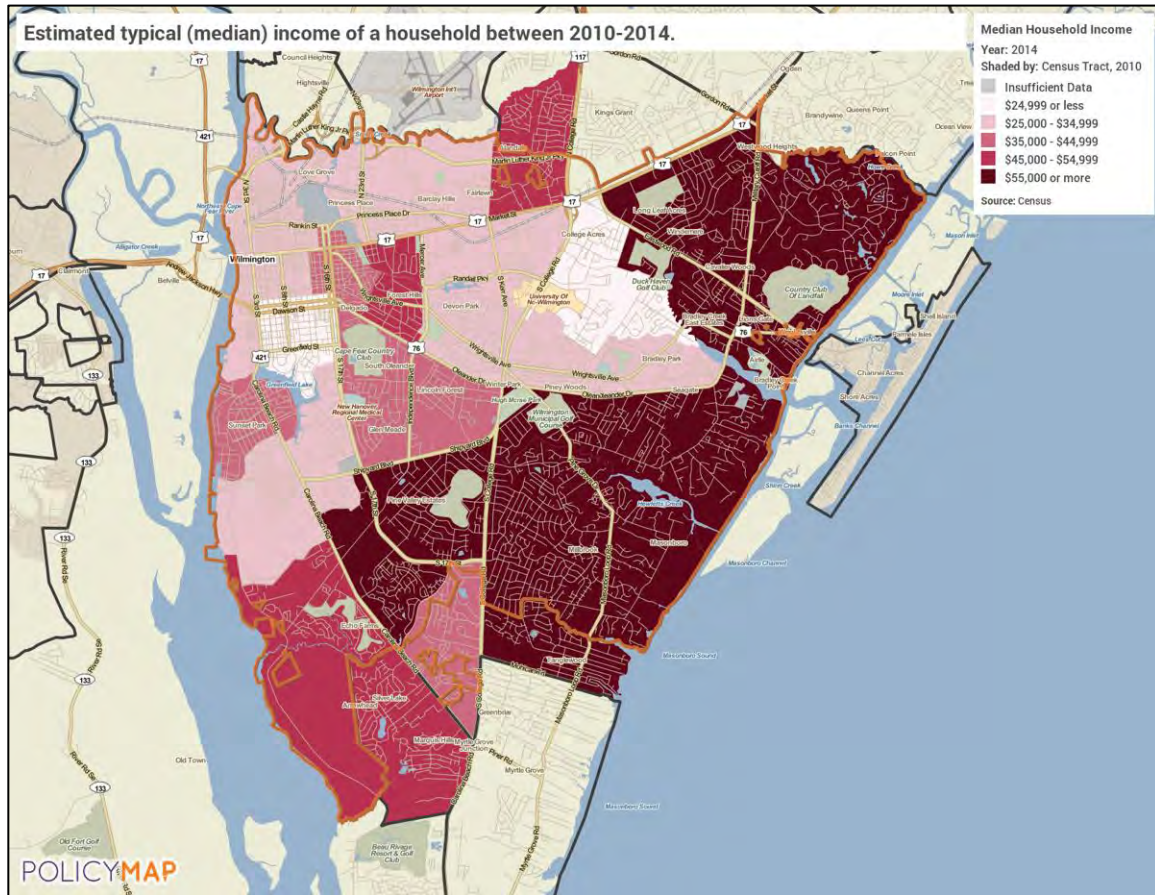


Source: PolicyMap & GreatSchools 2016

Data Note: The GreatSchools Overall School Rating dataset, available in PolicyMap's Add Sites menu, has a rating system based on a score ranging from 1 to 10, with 10 having the highest performance. GreatSchools calculates each rating by averaging that school's ratings for all grade/subject combinations.²

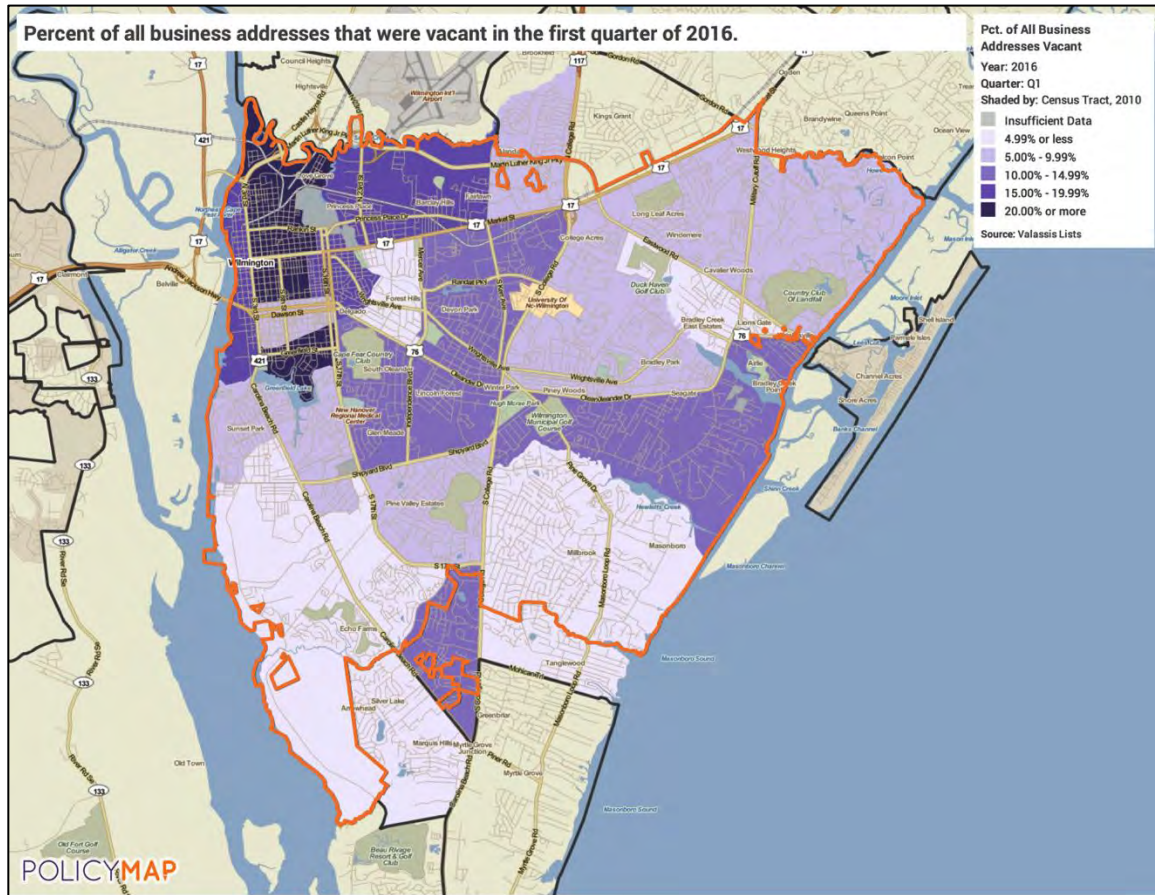
² Proximity to high performing public schools, GreatSchools via PolicyMap, 2016

**AFH Map 11 – Estimated Median Household Income
 (Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Contributing Factors
 of Publicly Supported Housing Location and Occupancy)**



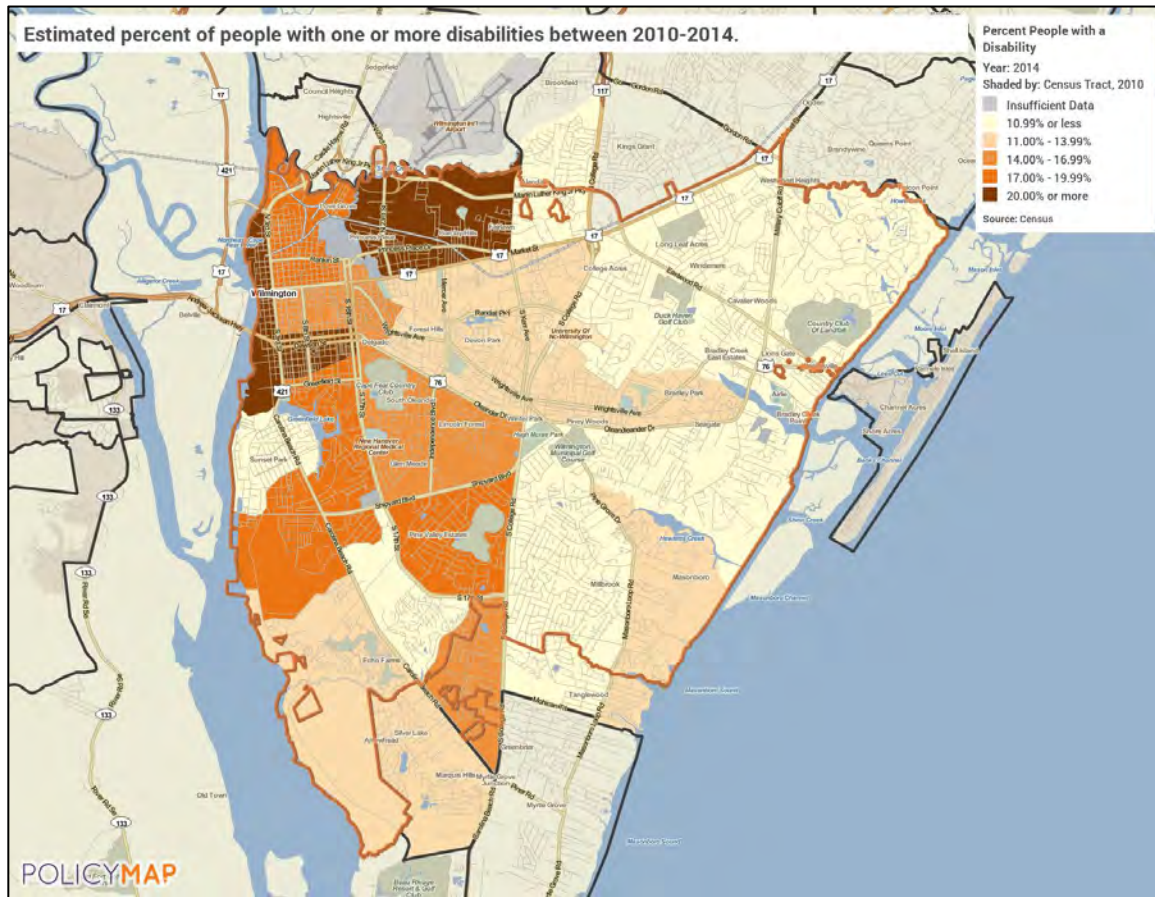
Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 12 – Percent of all Business Addresses that were Vacant
 (Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Contributing Factors
 of Publicly Supported Housing Location and Occupancy)**



Source: Valassis Lists via PolicyMap

AFH Map 13 – Percent of Persons with a Disability
(Section V – Fair Housing Analysis, Disability and Access Analysis, Population Profile)



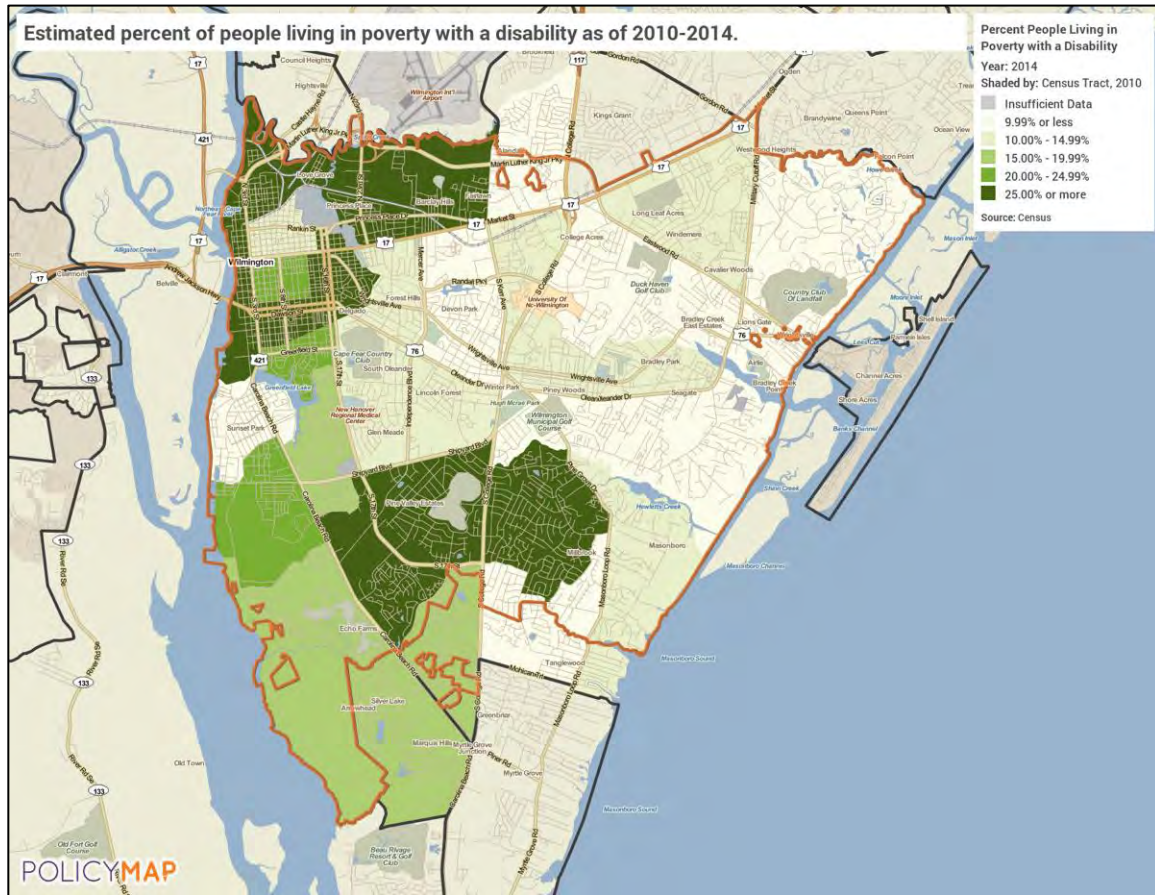
Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 14 – Percent of Persons with a Disability – Concentration
(Section V – Fair Housing Analysis, Disability and Access Analysis, Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings)**



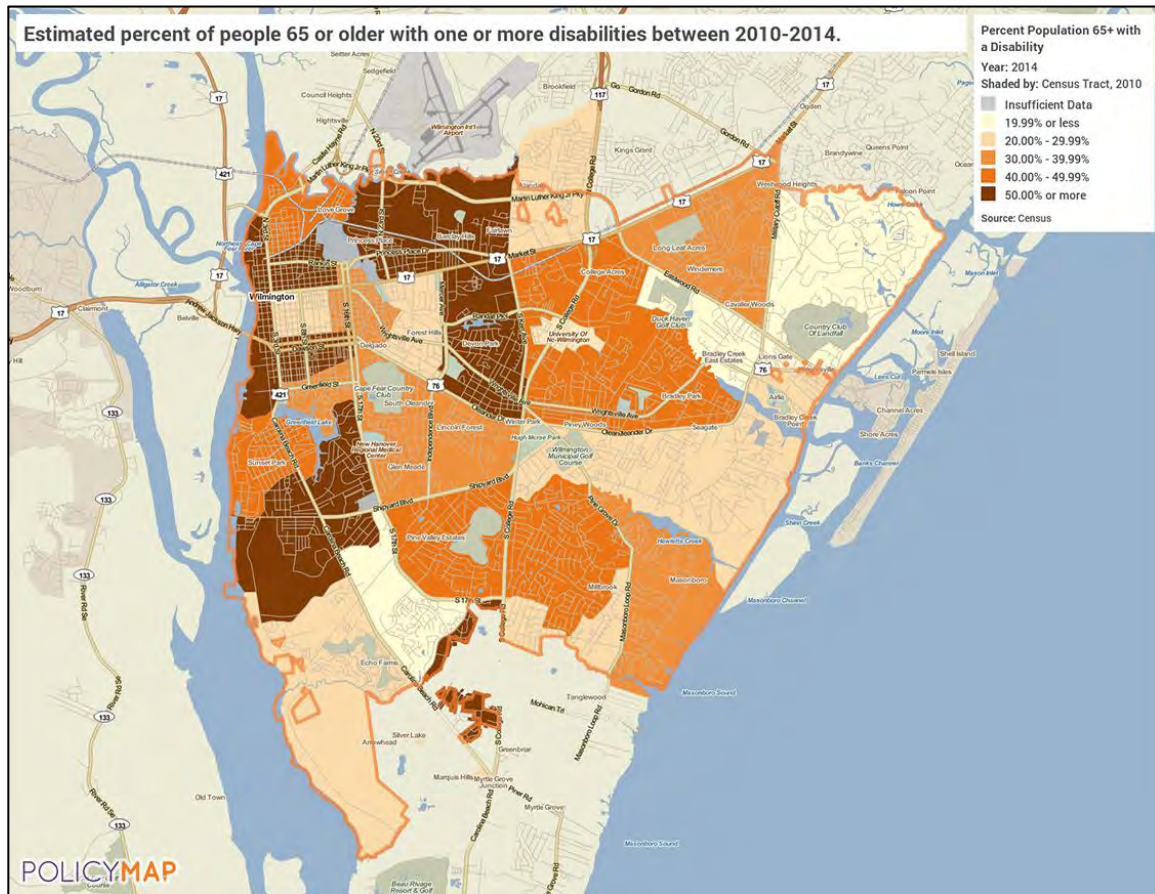
Source: 2010-2014 ACS 5-Year Estimates via PolicyMap

**AFH Map 15 – Percent of People Living in Poverty with a Disability
(Section V – Fair Housing Analysis, Disability and Access Analysis, Disparities in Access to Opportunity)**



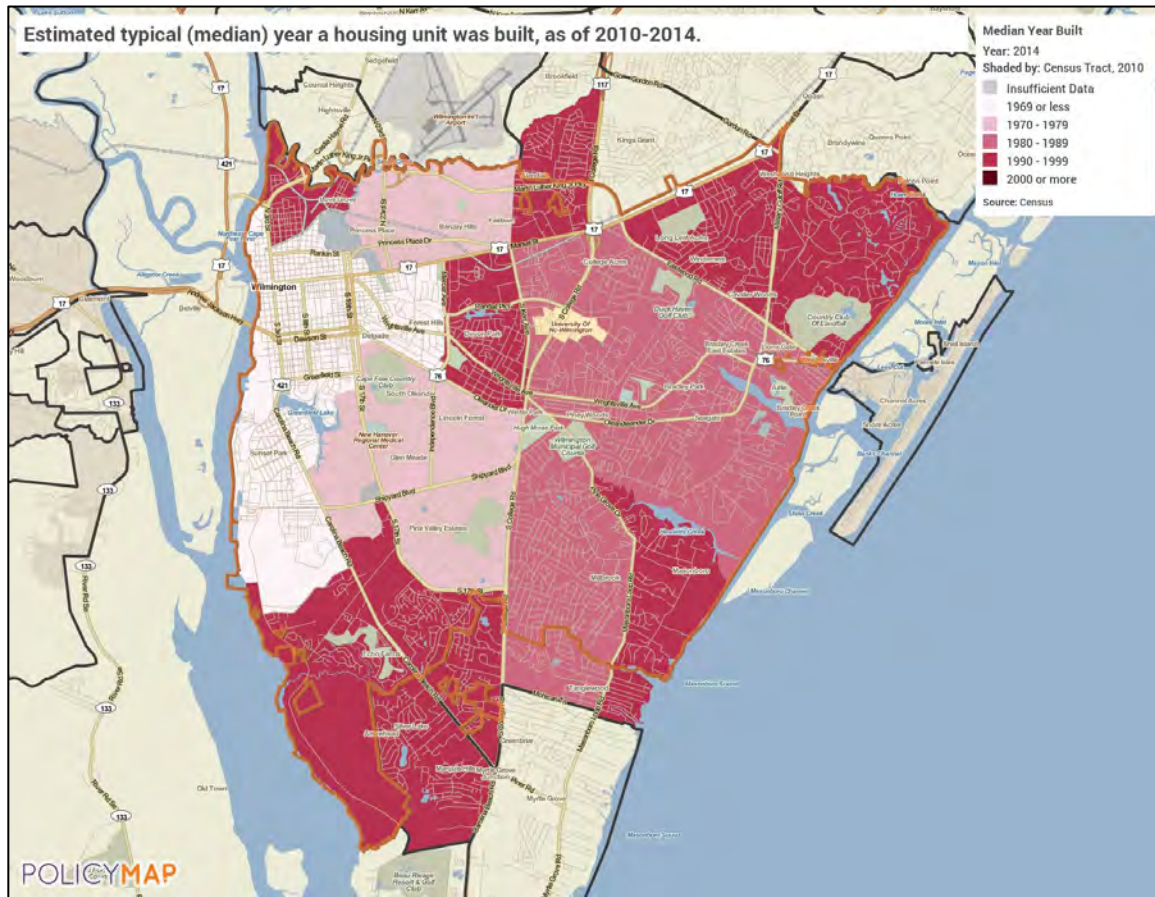
Source: American Community Survey 5-Year Estimates 2009-2014

**AFH Map 16 – Percent of People 65 and Older with a Disability
(Section V – Fair Housing Analysis, Disability and Access Analysis, Additional Information)**



Source: American Community Survey 5-Year Estimates 2009-2014

AFH Map 17 – Median Year Housing Unit was Built (Section V.D.7 Contributing Factors)



Source: American Community Survey 5-Year Estimates 2009-2014

AFH Tables

**AFH Table 1 – Percent of Housing Occupied by Renters and Owners
(Section V – Fair Housing Analysis, Demographic Summary)**

| Percent of Housing Occupied by Renters and Owners | | | | | | |
|--------------------------------------------------------------------------------------------------|--------|-------|--------|-------|--------|-------|
| | 2000 | | 2010 | | 2014 | |
| | Renter | Owner | Renter | Owner | Renter | Owner |
| Wilmington | 51.4% | 48.6% | 51.1% | 48.9% | 54.9% | 45.1% |
| New Hanover County | 35.3% | 64.7% | 40.2% | 59.8% | 42.4% | 57.6% |
| Source: 2000 Decennial Census DP-1, 2010 Decennial Census DP-1, 2014 ACS 5-Year Estimates B25003 | | | | | | |

**AFH Table 2 – Poverty Rate and Difference in R/ECAP Tracts by Race
(Section V – Fair Housing Analysis, R/ECAPS, Additional Information)**

| Poverty Rate and Difference in R/ECAP Tracts by Race | | | |
|--------------------------------------------------------------|--------|--------|------------|
| Census Tract | White | Black | Difference |
| 37129011100 | 34.01% | 49.02% | 15.01 |
| 37129010100 | 8.02% | 48.73% | 40.71 |
| 37129011400 | 28.28% | 37.87% | 9.59 |
| Source: 2010-2014 American Community Survey 5-Year Estimates | | | |

**AFH Table 3 – Renter and Owner Occupied Housing by Select Race/Ethnicity
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)**

| Renter and Owner Occupied Housing by Select Race/Ethnicity | | | | |
|-------------------------------------------------------------------|-------------------------------|-------------------|--------------------------------|-------------------|
| | Owner Occupied Housing | | Renter Occupied Housing | |
| | Number | Percentage | Number | Percentage |
| White | 18,892 | 88.2% | 18,390 | 70.4% |
| Black | 2,184 | 10.2% | 6,577 | 25.2% |
| American Indian and Alaska Native | 38 | 0.2% | 69 | 0.3% |
| Asian | 157 | 0.7% | 243 | 0.9% |
| Some Other Race | 86 | 0.4% | 420 | 1.6% |
| Two or More Races | 62 | 0.3% | 410 | 1.6% |
| Total | 21,419 | 100.0% | 26,109 | 100.0% |
| | | | | |
| Hispanic | 452 | 2.1% | 1,457 | 5.6% |
| Non-Hispanic | 20,967 | 97.9% | 24,652 | 94.4% |
| Total | 21,419 | 100.0% | 26,109 | 100.0% |
| Source: 2010-2014 American Community Survey 5-Year Estimates | | | | |

AFH Table 4 – Disposition of Application by Loan Type and Purpose, 2014
(Section V – Fair Housing Analysis, Disproportionate Housing Needs - Additional Information)

| Disposition of Application by Loan Type and Purpose, 2014 | | | | |
|------------------------------------------------------------------|------------------|----------------------|------------------|-------------------------|
| Single Family Homes (excluding manufactured homes) | | | | |
| | Loan Type | Home Purchase | Refinance | Home Improvement |
| Total Applications | | | | |
| | Conventional | 2,444 | 1,932 | 268 |
| | FHA | 407 | 208 | 15 |
| | VA | 311 | 252 | 14 |
| | FSA/RHS | 35 | 1 | 0 |
| Loans Originated | | | | |
| | Conventional | 1,454 | 946 | 120 |
| | FHA | 189 | 59 | 3 |
| | VA | 151 | 101 | 4 |
| | FSA/RHS | 14 | 0 | 0 |
| Loans Approved but not accepted | | | | |
| | Conventional | 69 | 75 | 14 |
| | FHA | 6 | 7 | 4 |
| | VA | 6 | 12 | 1 |
| | FSA/RHS | 1 | 0 | 0 |
| Applications Denied | | | | |
| | Conventional | 145 | 429 | 109 |
| | FHA | 25 | 55 | 3 |
| | VA | 24 | 56 | 3 |
| | FSA/RHS | 3 | 0 | 0 |
| Applications Withdrawn | | | | |
| | Conventional | 262 | 226 | 13 |
| | FHA | 35 | 31 | 2 |
| | VA | 30 | 33 | 3 |
| | FSA/RHS | 3 | 0 | 0 |
| Files Closed for Incompleteness | | | | |
| | Conventional | 24 | 74 | 6 |
| | FHA | 9 | 12 | 3 |
| | VA | 2 | 21 | 1 |
| | FSA/RHS | 0 | 0 | 0 |
| Source: 2014 HDMA | | | | |

AFH Table 5 – WHA Property Listing

(Section V – Fair Housing Analysis, Disability and Access Analysis, Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings)

| Property | Property Type | Year Developed | Number of Targeted Units |
|------------------------------------------------|----------------------|----------------|--------------------------|
| New Brooklyn Homes at Robert R. Taylor Estates | LIHTC/Public Housing | 2011 | 5 |
| Creekwood South | LIHTC/Public Housing | 2012 | 14 |
| Jervay House | SHDP/PBV | 2011 | 8 |
| Rankin Place Terrace | LIHTC/Public Housing | 2016 | 8 |
| Source: Wilmington Housing Authority | | | |

AFH Table 6 – Disability Characteristics in Wilmington

(Section V – Fair Housing Analysis, Disability and Access Analysis, Disproportionate Housing Needs)

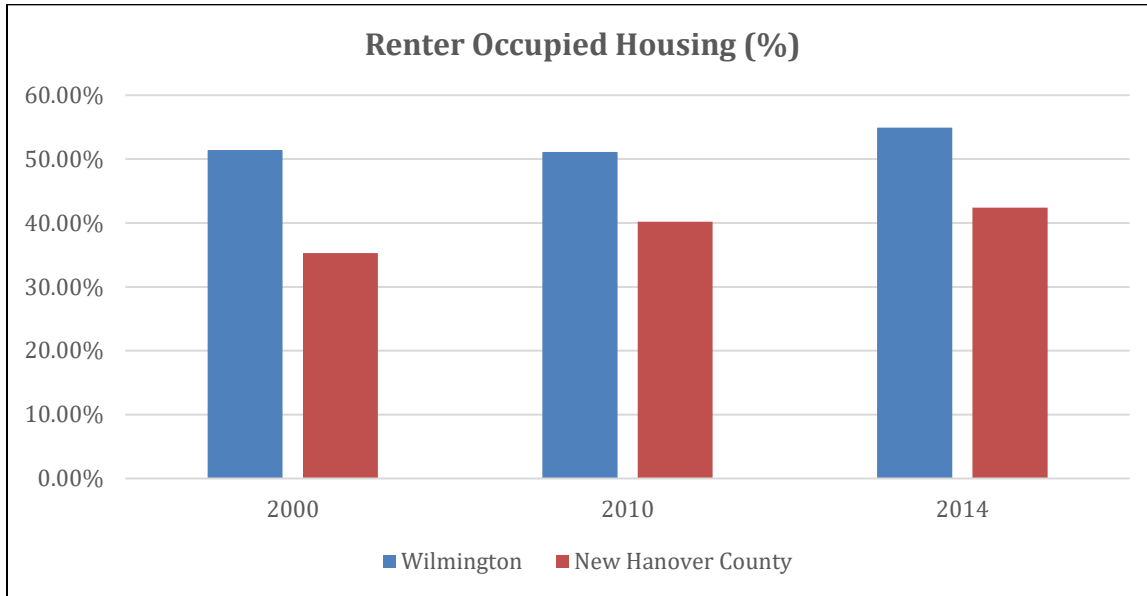
| Table: Disability Characteristics (Wilmington) | | |
|----------------------------------------------------------------------------------------------------------------|-------------------|---------|
| Disability Type | With a Disability | Percent |
| With a hearing difficulty | 3,908 | 27.1% |
| With a vision difficulty | 2,534 | 17.6% |
| With a cognitive difficulty | 5,529 | 38.3% |
| With an ambulatory difficulty | 7,511 | 52.1% |
| With a self-care difficulty | 2,461 | 17.1% |
| With an independent living difficulty | 4,672 | 32.4% |
| Total | 14,428 | -- |
| Data Source 2010-2014 ACS 5-Year Estimates (S1810) | | |
| Data Note: Persons with Disability Type do not add up because an individual may have more than one difficulty. | | |

**AFH Table 7 – Basis for Discrimination Complaint
(Section V – Fair Housing Analysis, Fair Housing Enforcement, Outreach Capacity and
Resource Analysis)**

| Basis for Discrimination Complaint | | | | | | |
|---------------------------------------------------------------------------------------------------|-------------|------------------------|-------------------|------------------------|-----------------|------------|
| Year | Race | National Origin | Disability | Familial Status | Religion | Sex |
| 2006 | 4 | 2 | 1 | 0 | 1 | 3 |
| 2007 | 5 | 1 | 7 | 0 | 0 | 0 |
| 2008 | 0 | 3 | 4 | 1 | 0 | 0 |
| 2009 | 2 | 2 | 2 | 0 | 0 | 0 |
| 2010 | 1 | 0 | 5 | 2 | 0 | 2 |
| 2011 | 1 | 0 | 3 | 0 | 0 | 0 |
| 2012 | 0 | 0 | 1 | 0 | 0 | 0 |
| 2013 | 1 | 0 | 0 | 0 | 0 | 0 |
| 2014 | 0 | 0 | 1 | 0 | 0 | 0 |
| 2015 | 0 | 0 | 1 | 0 | 0 | 0 |
| 2016 | 0 | 0 | 3 | 0 | 0 | 0 |
| Source: Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity | | | | | | |

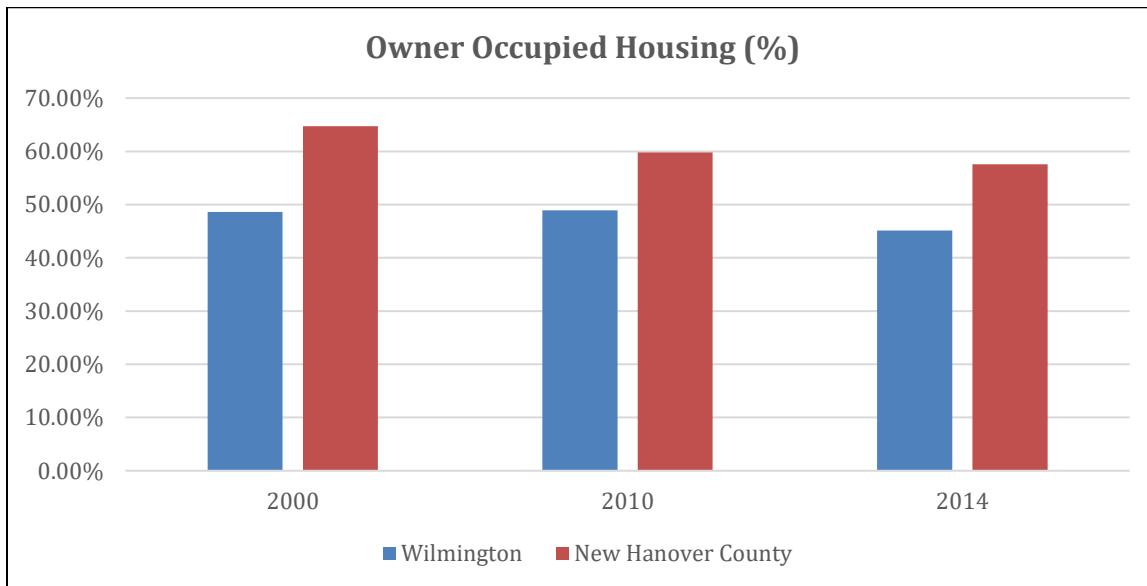
AFH Charts

AFH Chart 1 – Renter Occupied Housing (%)
(Section V – Fair Housing Analysis, Demographic Summary)



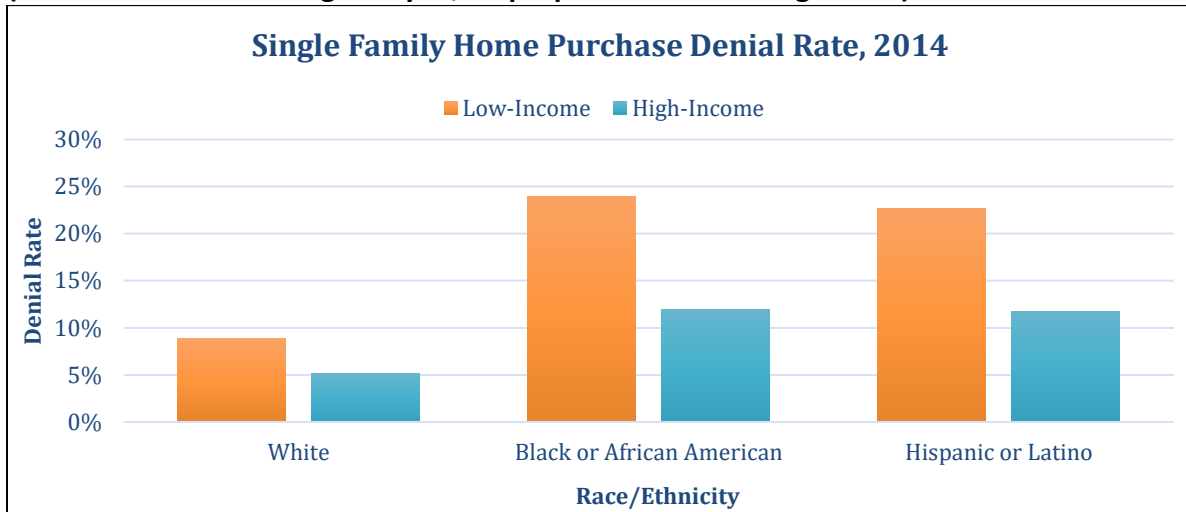
Source: 2000 Decennial Census, 2010 Decennial Census, 2014 ACS 5-Year Estimates

AFH Chart 2 – Owner Occupied Housing (%)
(Section V – Fair Housing Analysis, Demographic Summary)



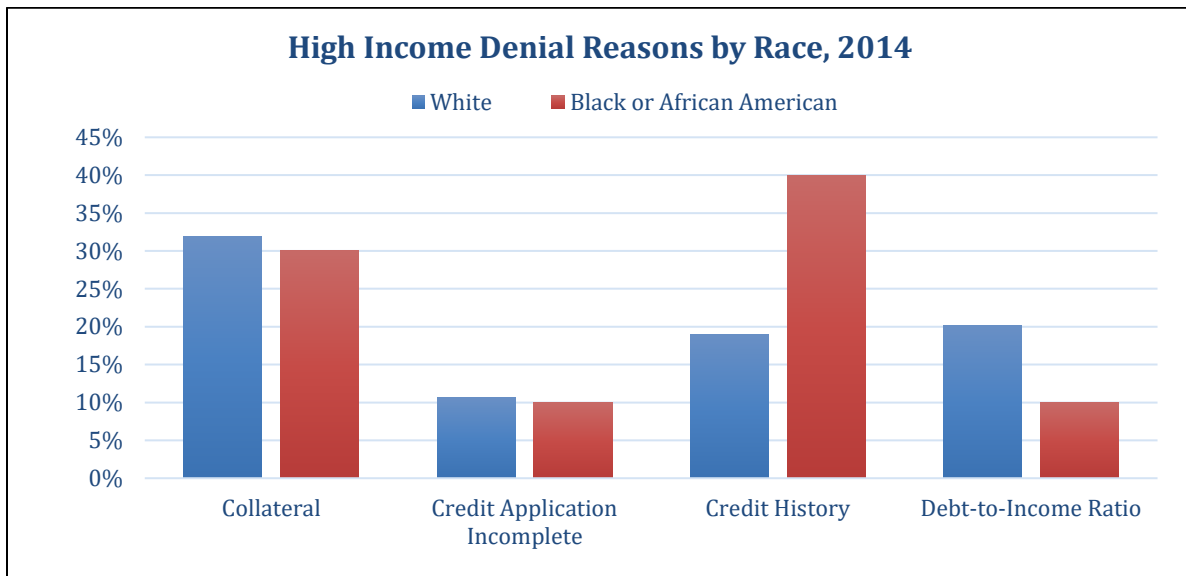
Source: 2000 Decennial Census, 2010 Decennial Census, 2014 ACS 5-Year Estimates

AFH Chart 3 – Single Family Home Purchase Denial Rate, 2014
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)



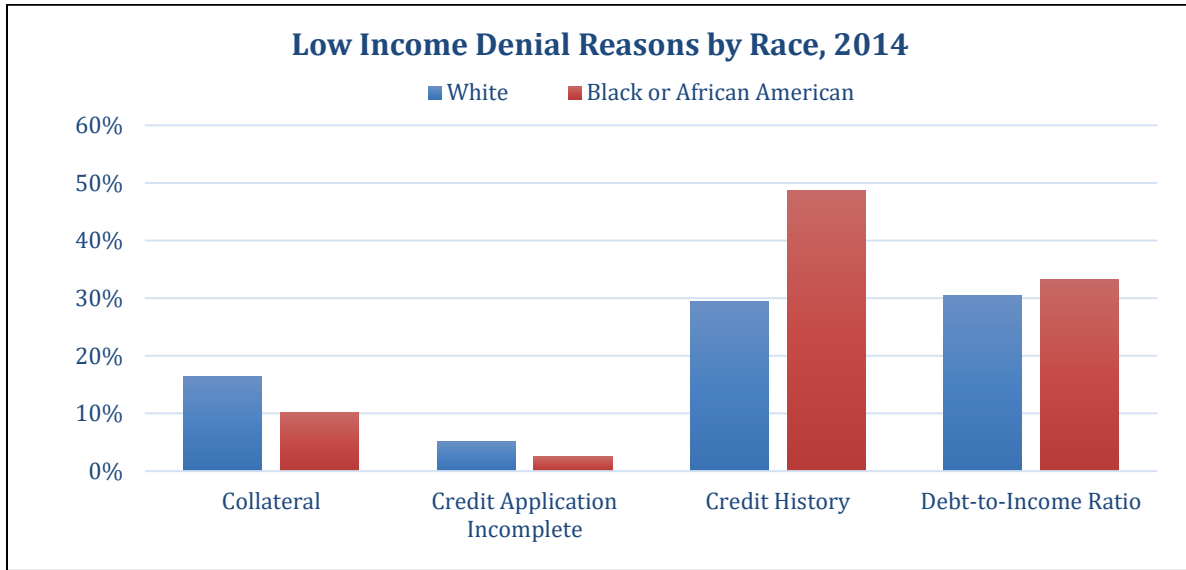
Source: 2014 HDMA

AFH Chart 4 – High Income Denial Reasons by Race, 2014
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)



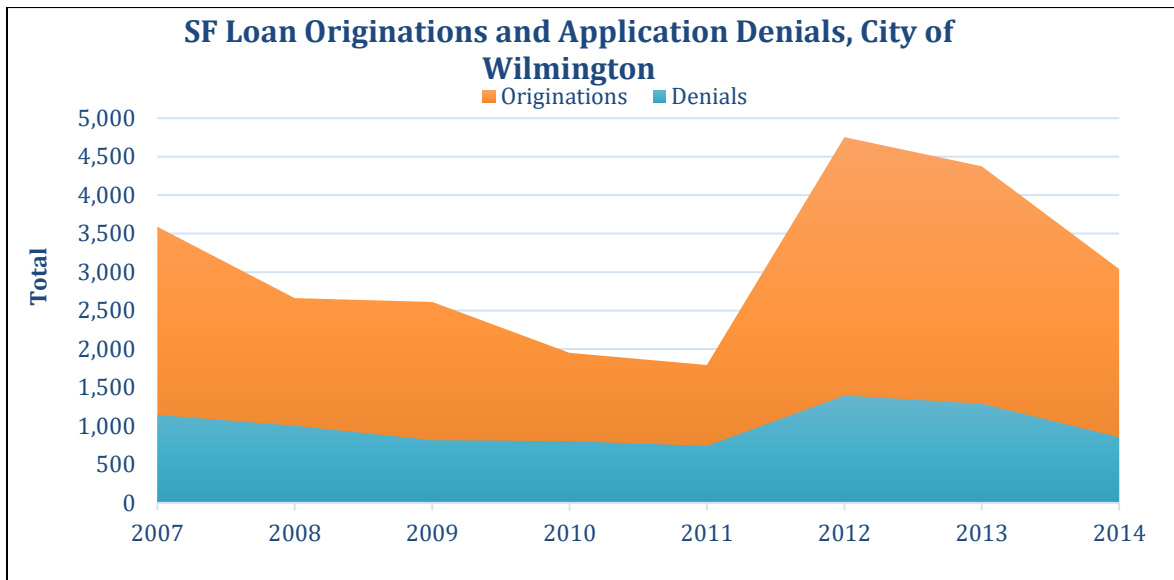
Source: 2014 HDMA

AFH Chart 5 – Low Income Denial Reasons by Race, 2014
 (Section V – Fair Housing Analysis, Disproportionate Housing Needs)



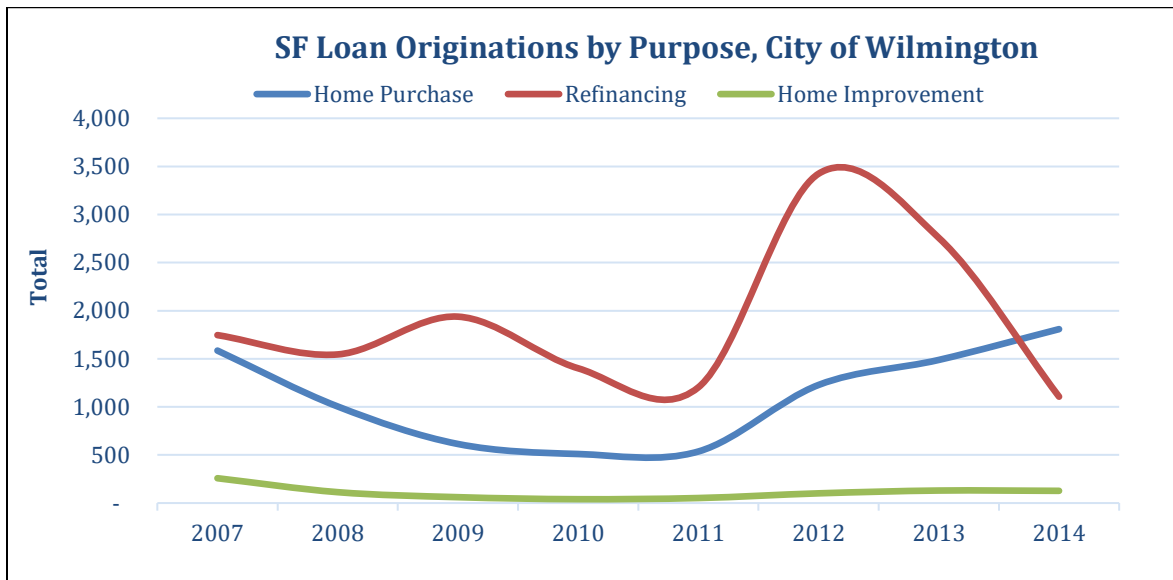
Source: 2014 HDMA

AFH Chart 6 – SF Loan Originations and Application Denials
 (Section V – Fair Housing Analysis, Disproportionate Housing Needs)



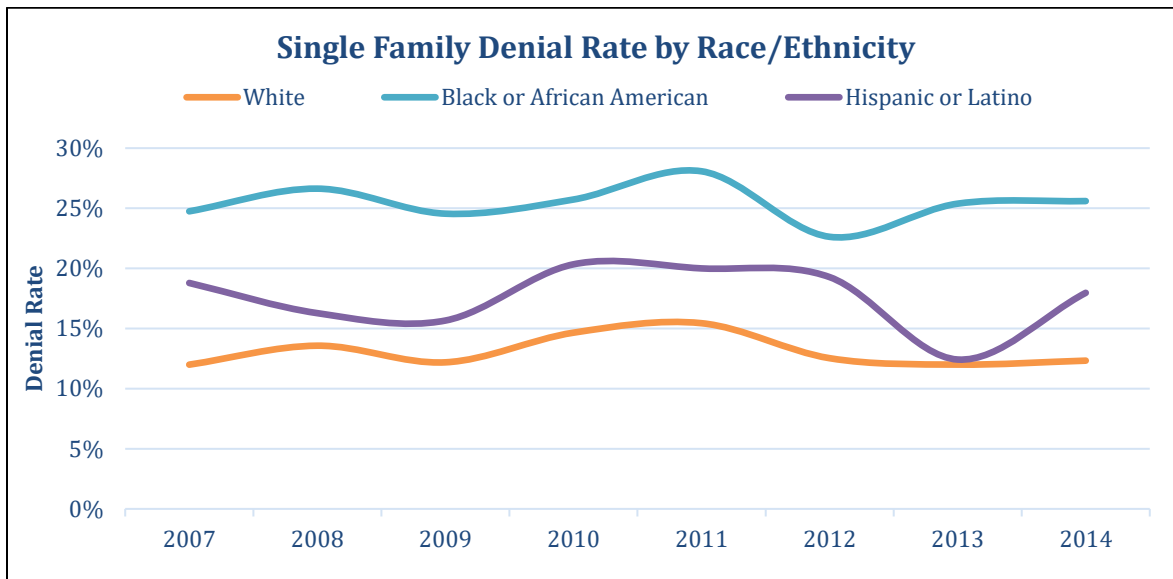
Source: 2014 HDMA

AFH Chart 7 – SF Loan Originations by Purpose
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)



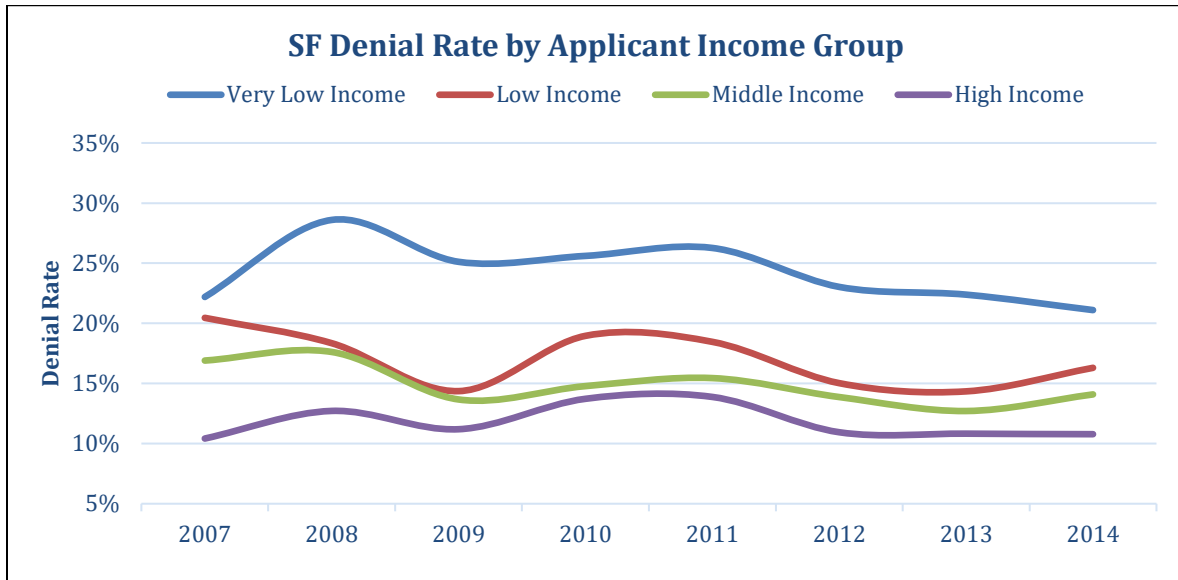
Source: 2014 HDMA

AFH Chart 8 – Single Family Denial Rate by Race/Ethnicity
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)



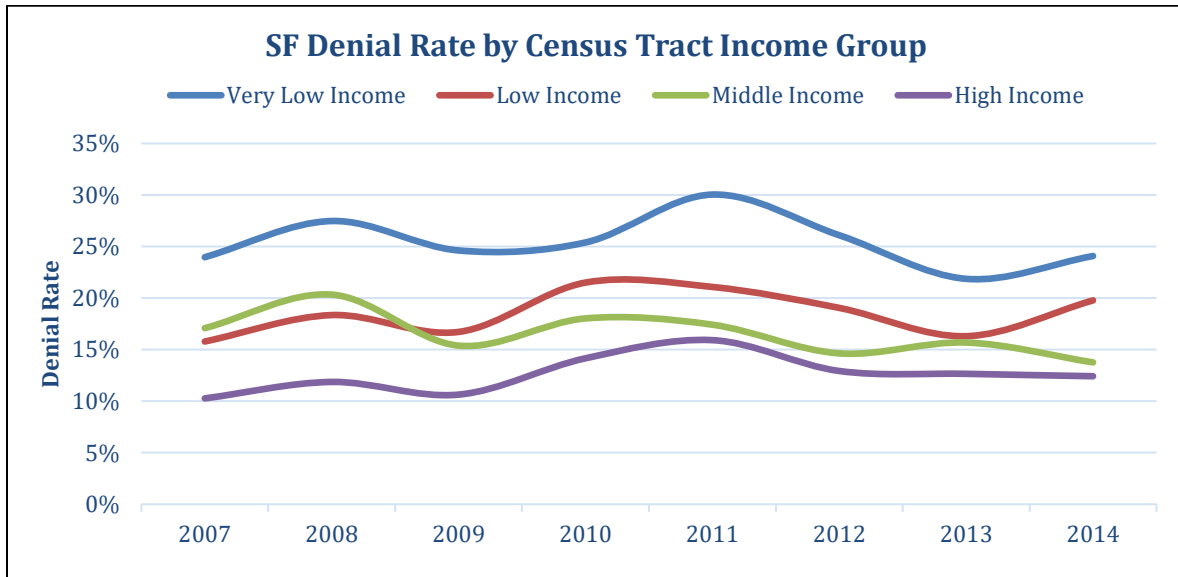
Source: 2014 HDMA

**AFH Chart 9 – SF Denial Rate by Applicant Income Group
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)**



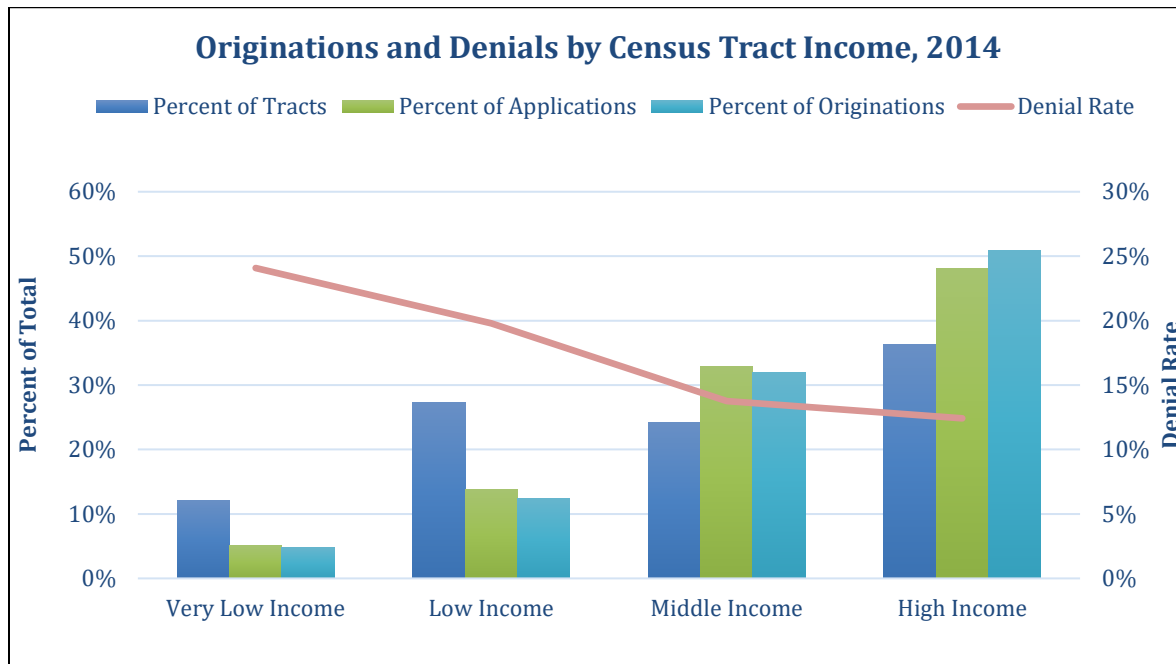
Source: 2014 HDMA

**AFH Chart 10 – SF Denial Rate by Census Tract Income Group
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)**



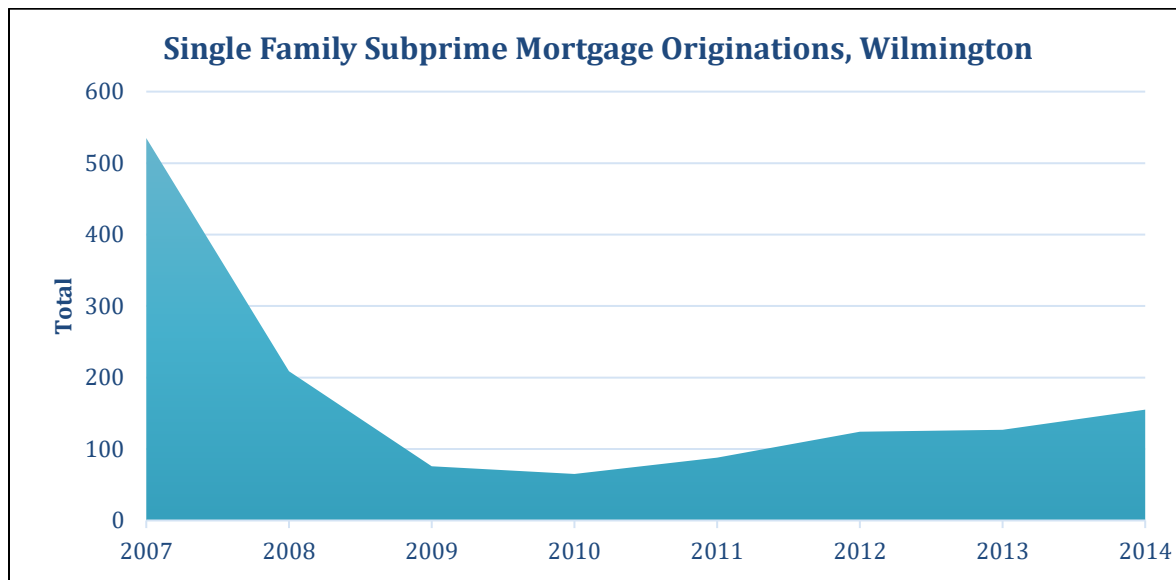
Source: 2014 HDMA

AFH Chart 11 – Originations and Denials by Census Tract Income, 2014
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)



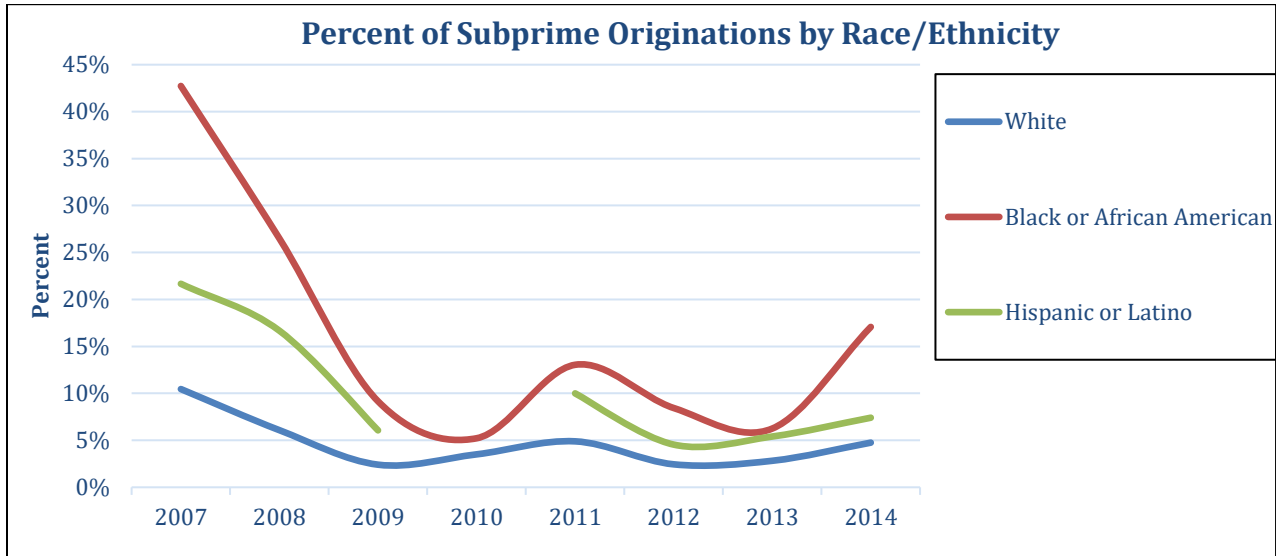
Source: 2014 HDMA

AFH Chart 12 – Single Family Subprime Mortgage Originations, Wilmington
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)



Source: 2014 HDMA

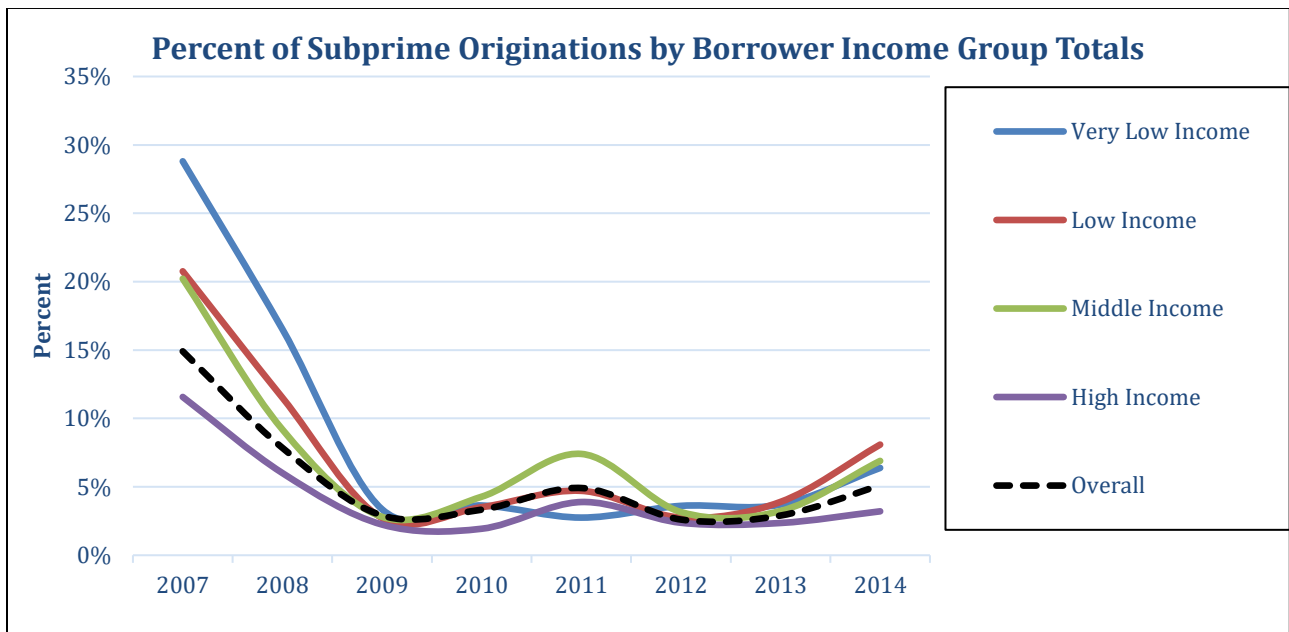
**AFH Chart 13 – Percent of Subprime Originations by Race/Ethnicity
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)**



Source: 2014 HDMA

Note: Hispanic data for 2010 unavailable due to sample size.

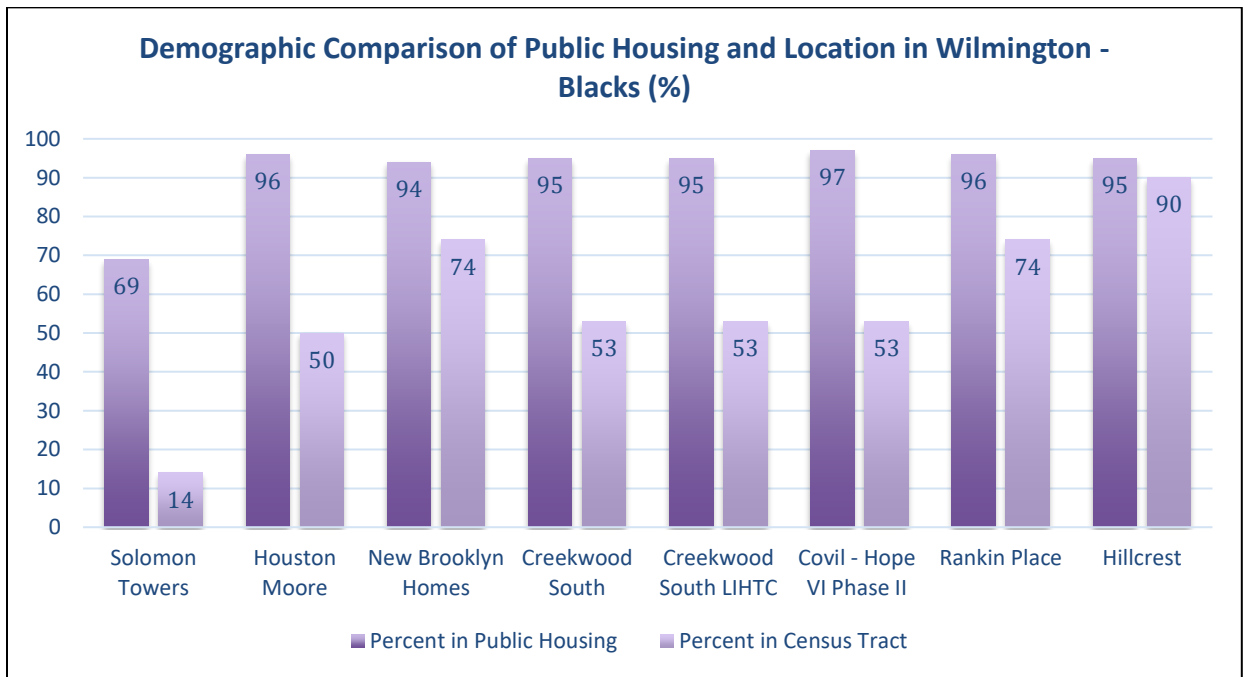
**AFH Chart 14 – Percent of Subprime Originations by Borrower Income Group Totals
(Section V – Fair Housing Analysis, Disproportionate Housing Needs)**



Source: 2014 HDMA

AFH Chart 15 – Demographic Comparison of Public Housing and Location in Wilmington, Blacks

(Section V – Fair Housing Analysis, Publicly Supported Housing Analysis, Location and Occupancy and Disparities in Access to Opportunity)



Source: HUD Table 8, 2010-2014 ACS via PolicyMap

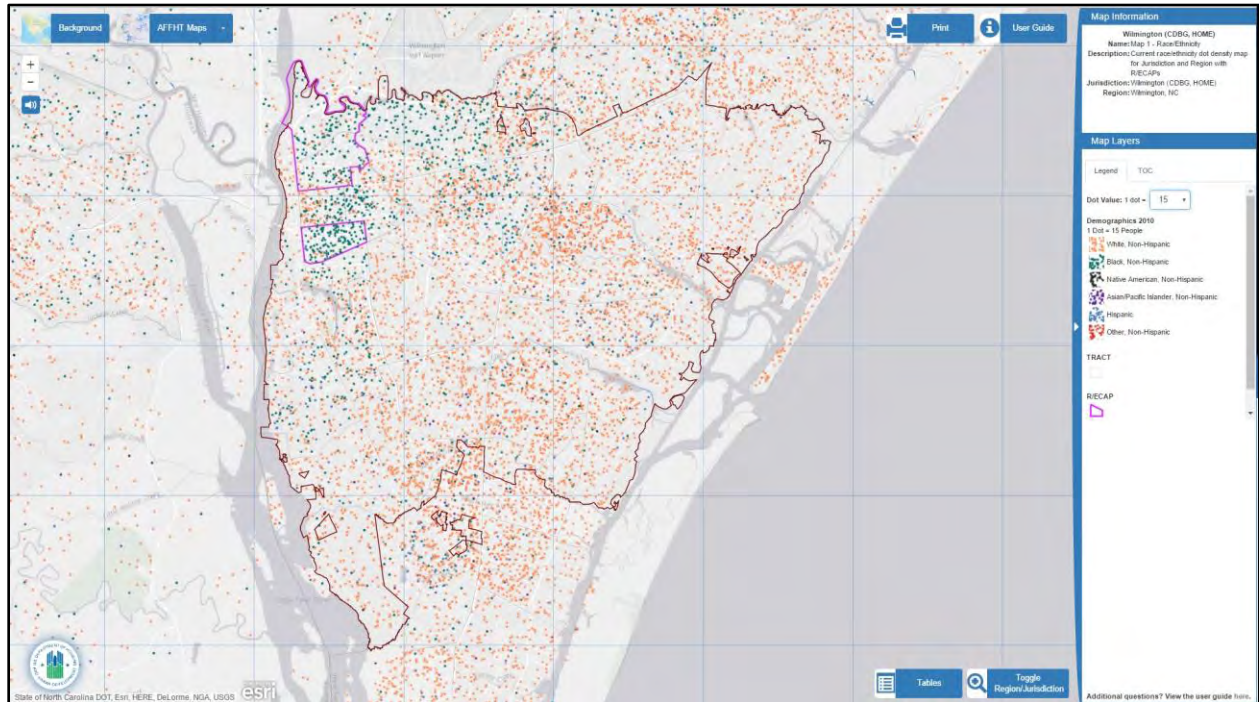
HUD Appendix

1. HUD Maps

2. HUD Tables

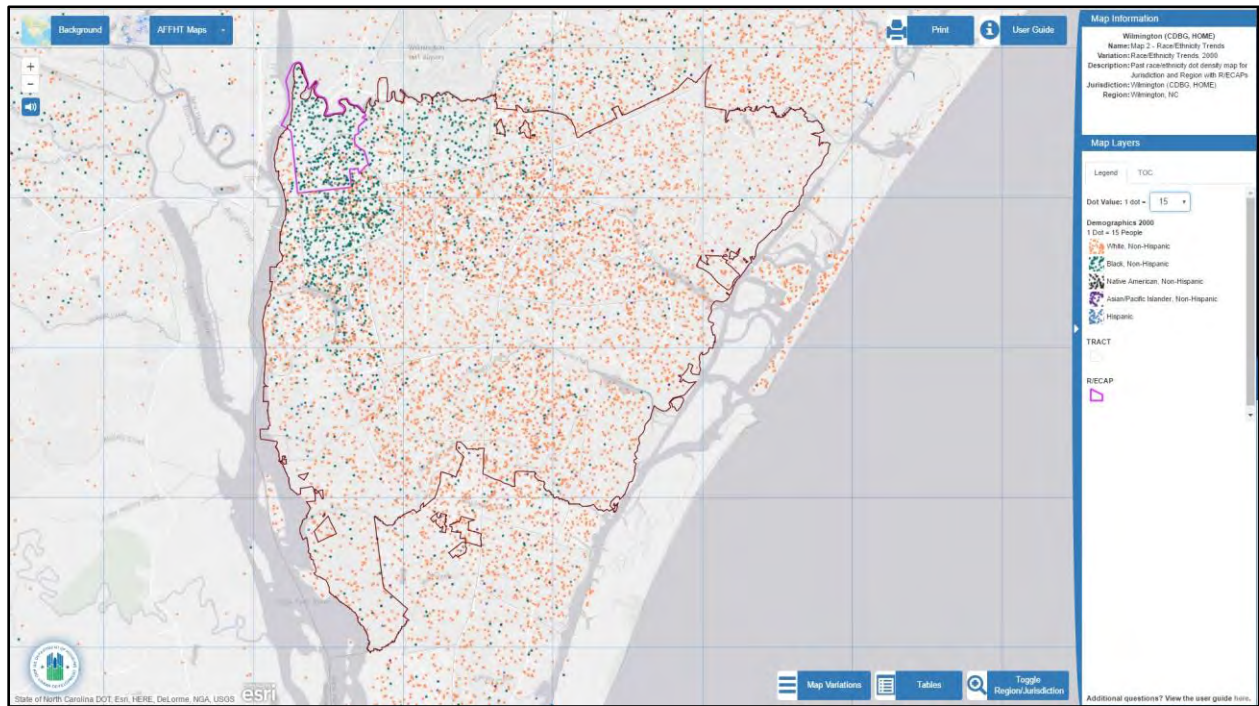
HUD Map

HUD Map 1 – Race and Ethnicity (Section V.B.1)



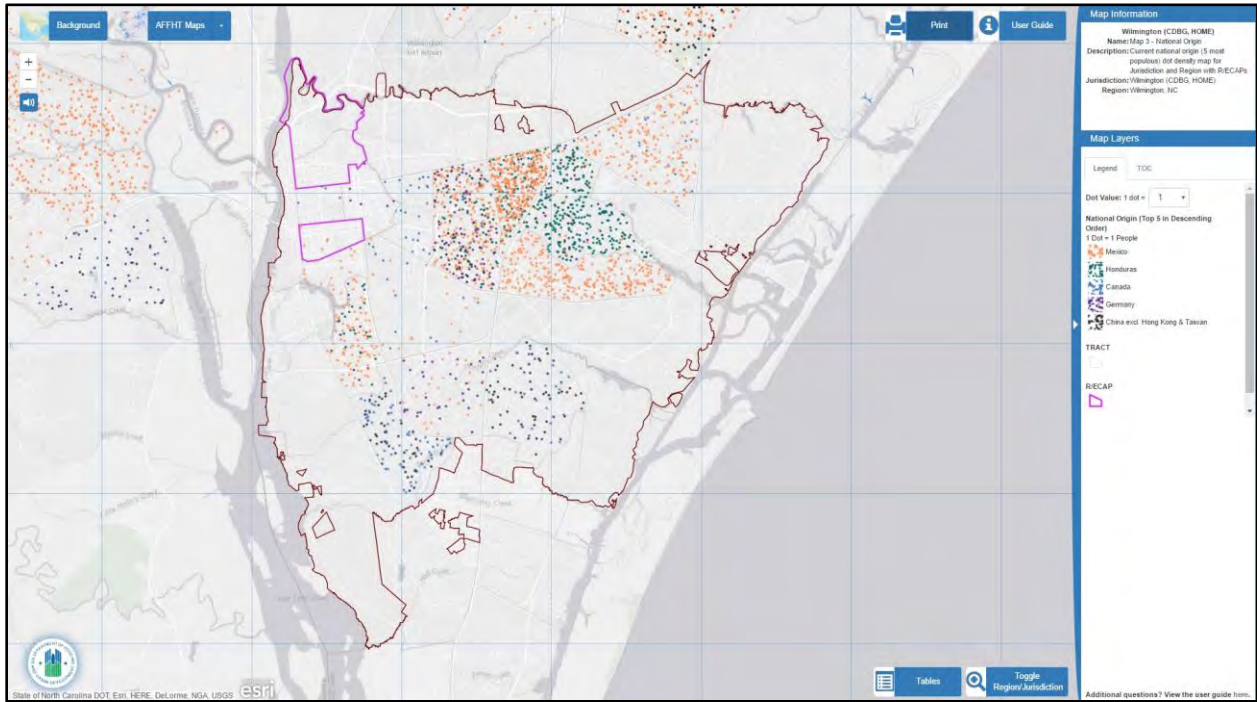
Source: Decennial Census, 2010

HUD Map 2 – Race/Ethnicity Trends (Section V.B.1)



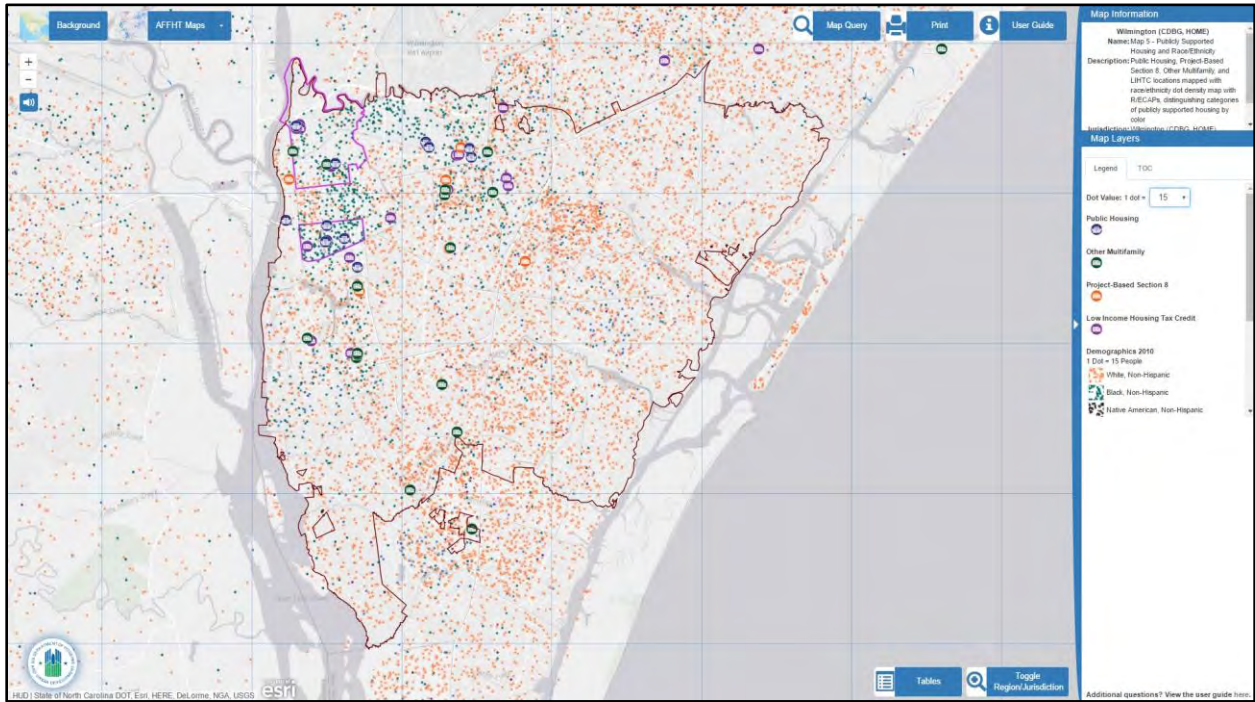
Source: Brown Longitudinal Tract Database based on decennial census data, 2000

HUD Map 3 – National Origin (Section V.B.1)



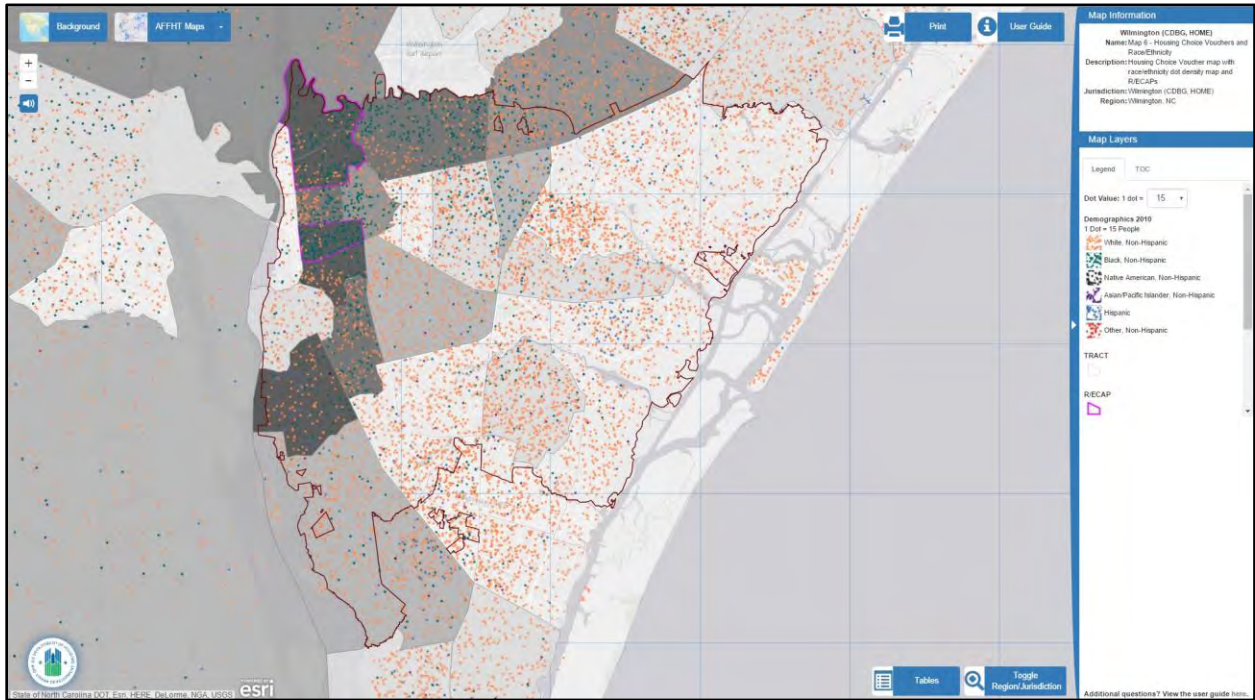
Source: American Community Survey (ACS), 2009-2013

HUD Map 5 – Publicly Supported Housing and Race/Ethnicity (Section V.C.1 and Section V.D.1)



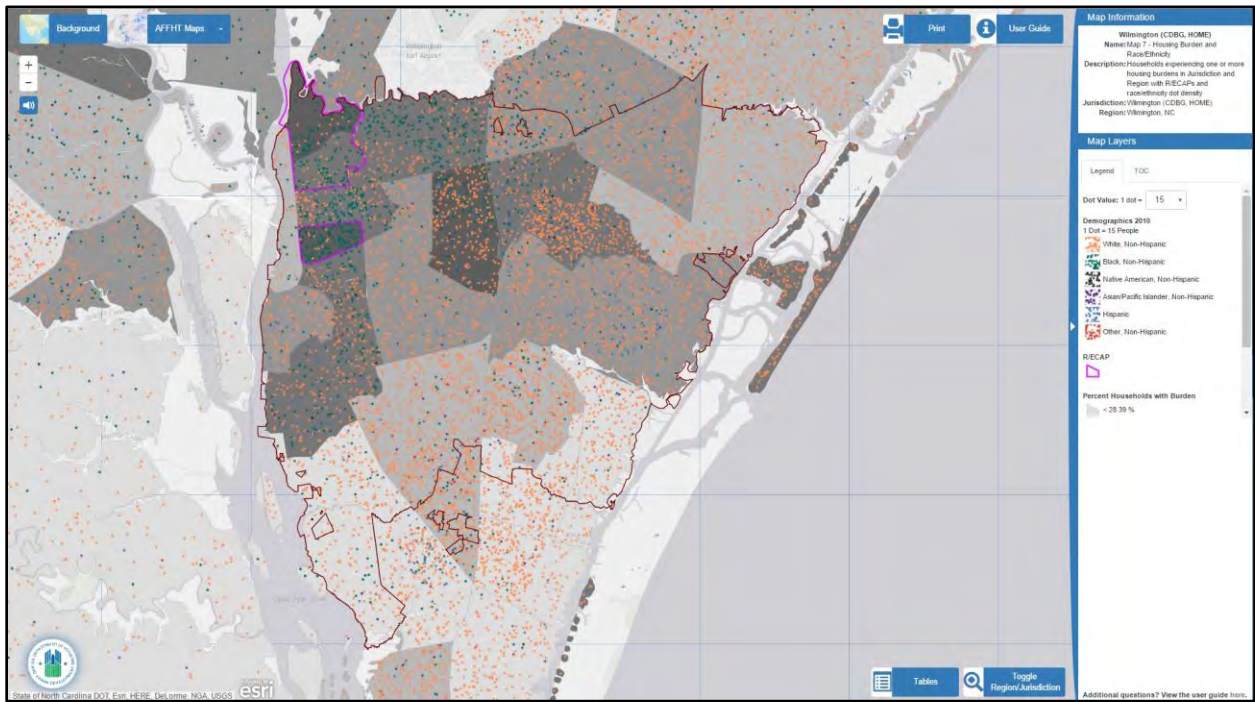
Source: Decennial Census, 2010; National Low-Income Tax Credit Database, 2013

HUD Map 6 – Housing Choice Vouchers and Race/Ethnicity (Section V.D.1)



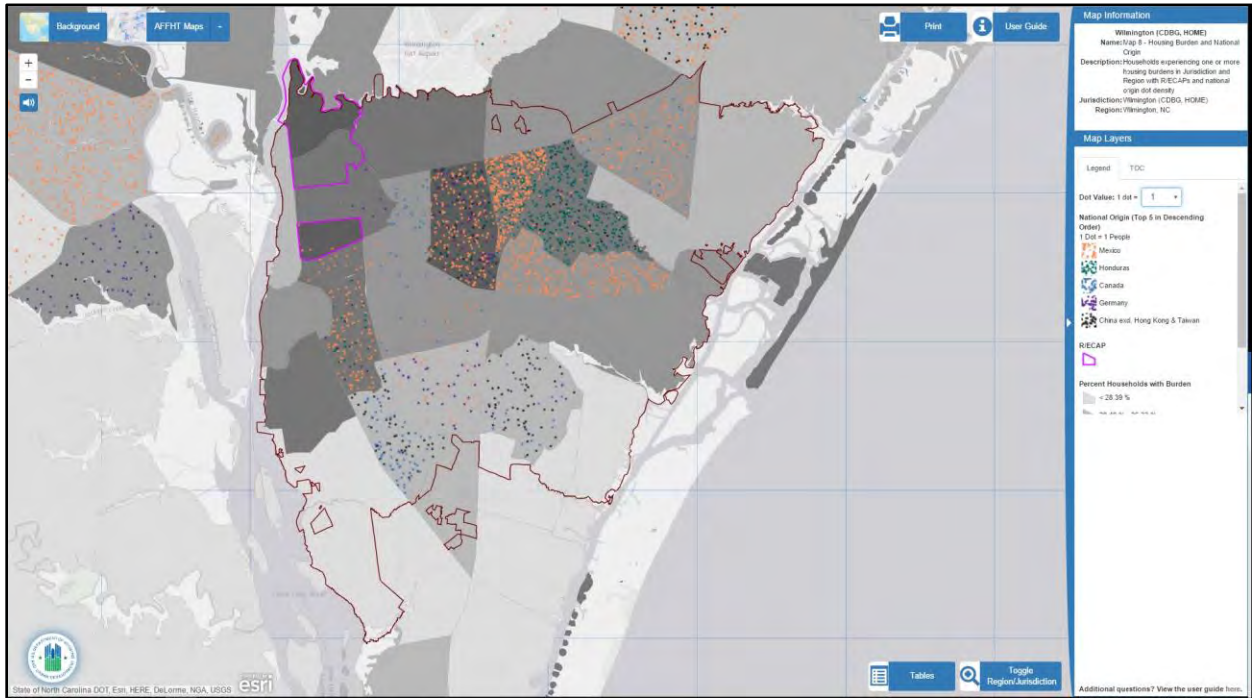
Source: Decennial Census, 2010; National Low-Income Tax Credit Database, 2013

HUD Map 7 – Housing Burden and Race/Ethnicity (Section V.B.4)



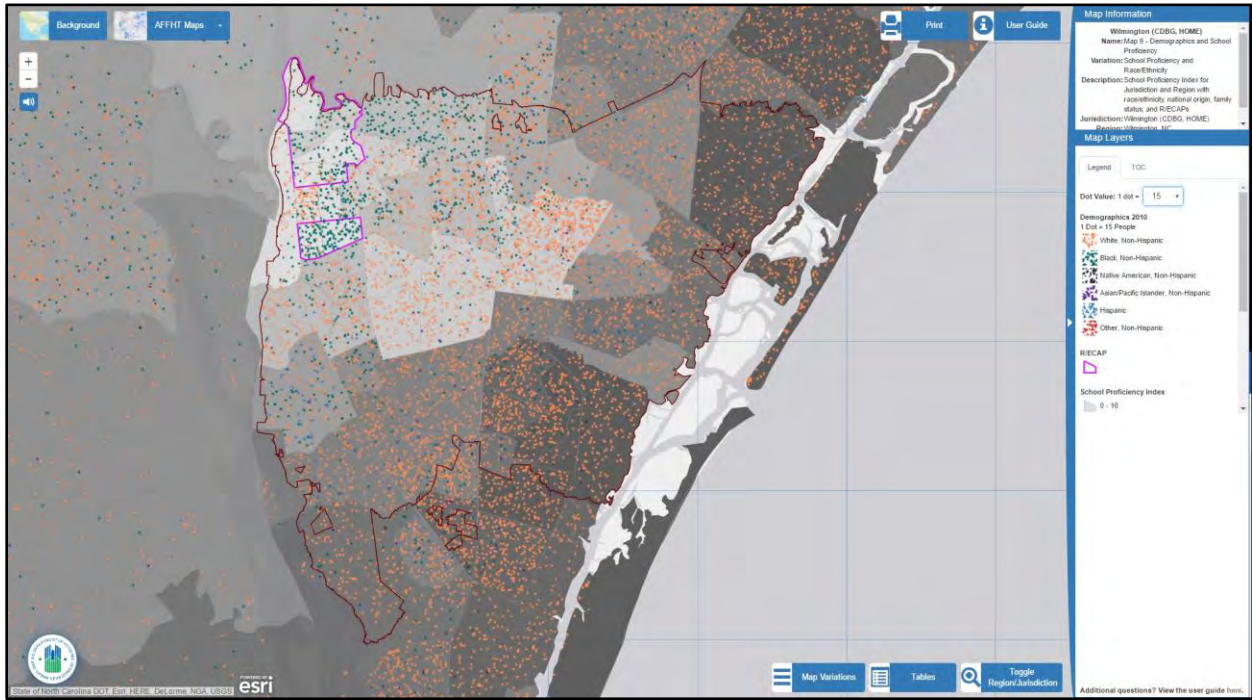
Source: Decennial Census, 2010; Comprehensive Housing Affordability Strategy (CHAS), 2008-2012

HUD Map 8 – Housing Burden and National Origin (Section V.B.4)



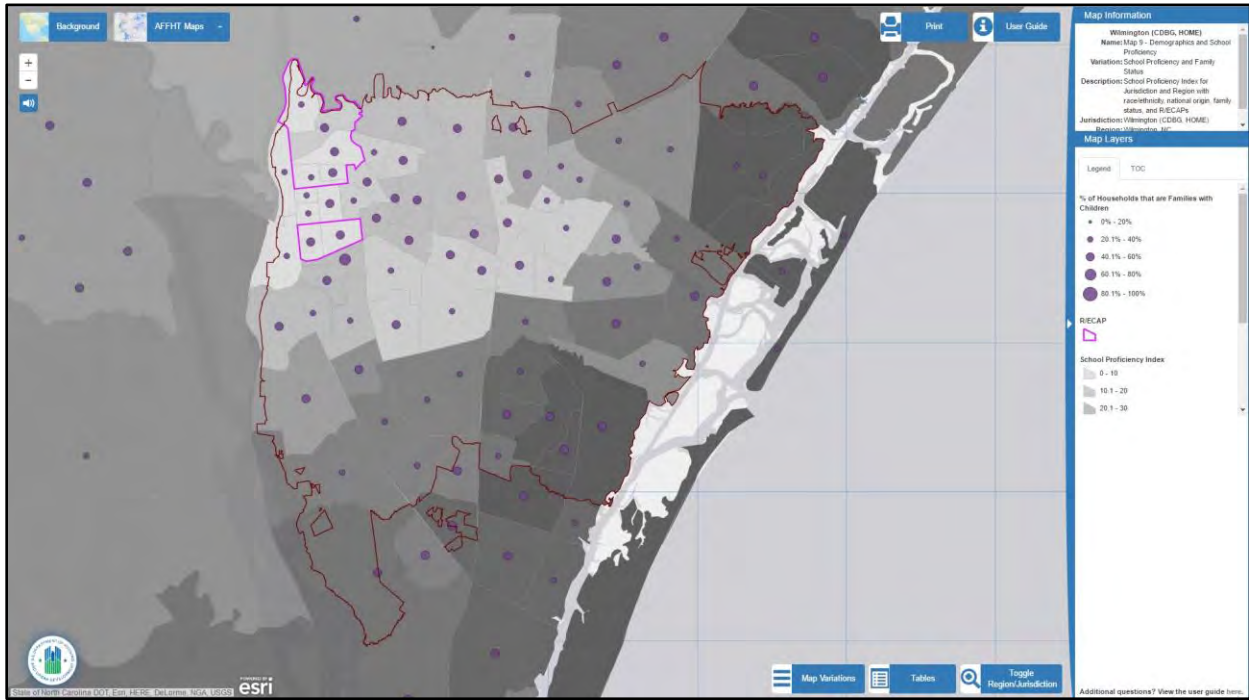
Source: American Community Survey 5-Year Estimates 2009-2013

HUD Map 9a – Demographics and School Proficiency (Section V.B.3)



Source: Decennial Census, 2010; Great Schools, 2012;

HUD Map 9b – School Proficiency and Family Status (Section V.B.3)



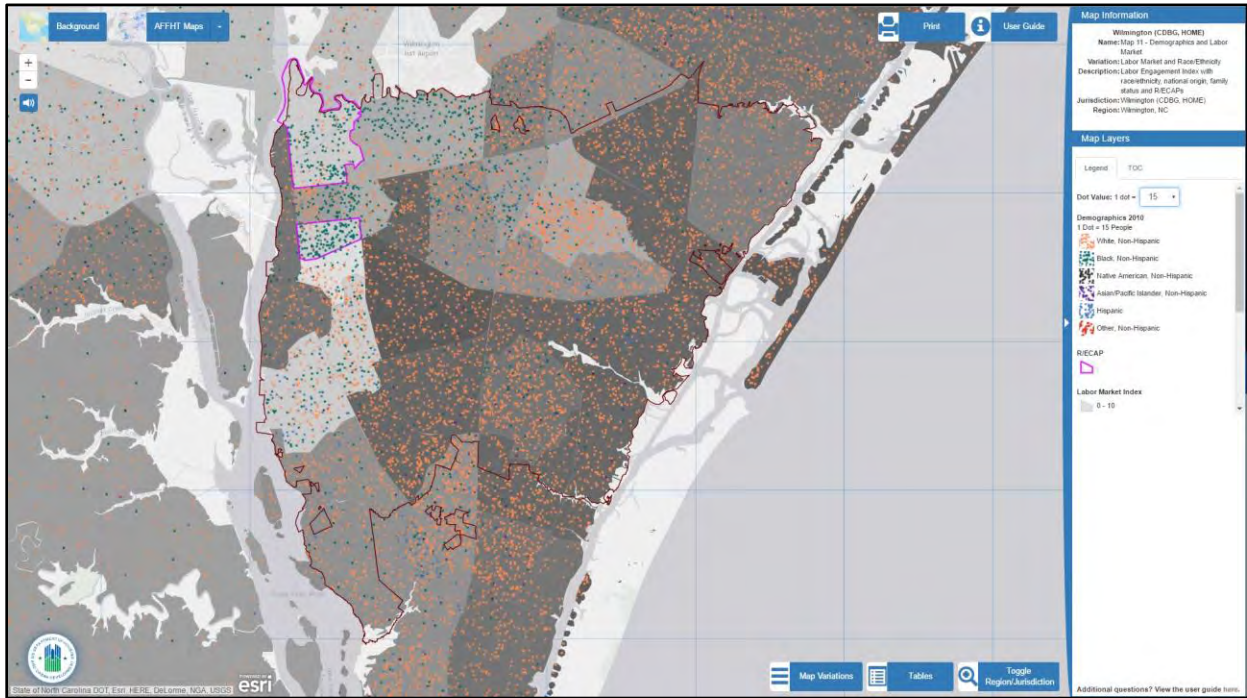
Source: Decennial Census, 2010; Great Schools, 2012;

HUD Map 10 – Job Proximity and Race/Ethnicity (Section V.B.3)



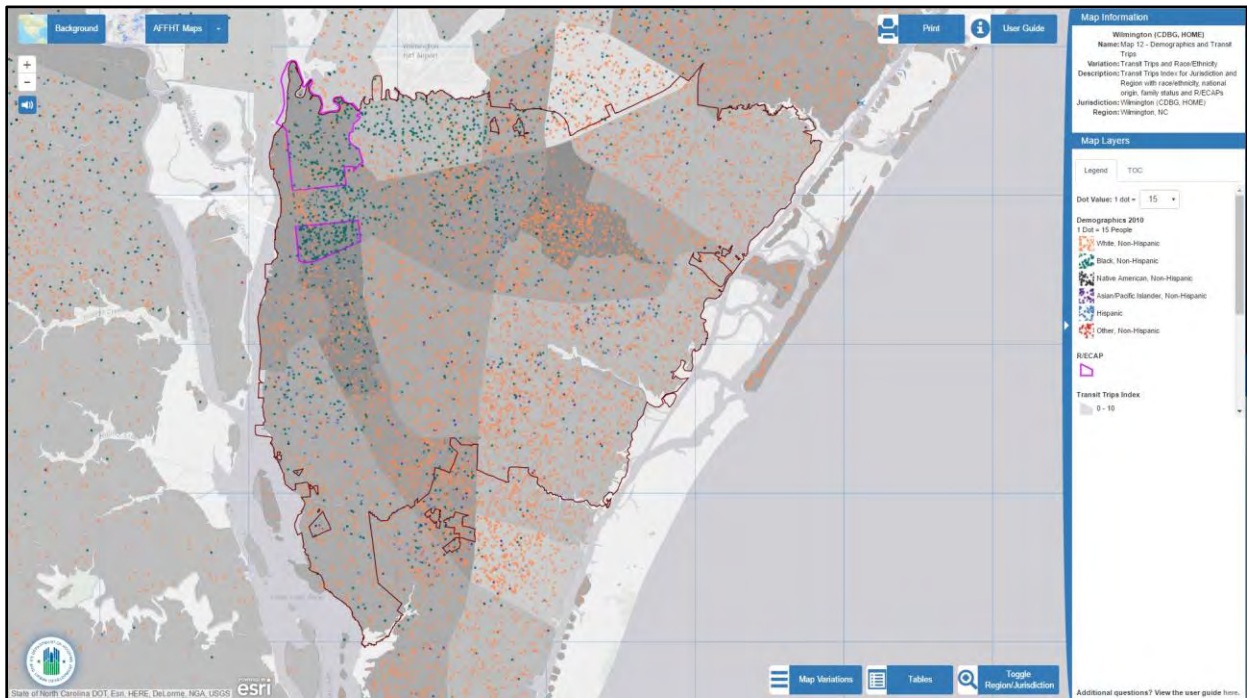
Source: Longitudinal Employer-Household Dynamics, 2013; Decennial Census, 2010

HUD Map 11 – Demographics and Labor Market (Section V.B.3, V.C.1 – Disparities in Access to Opportunity)



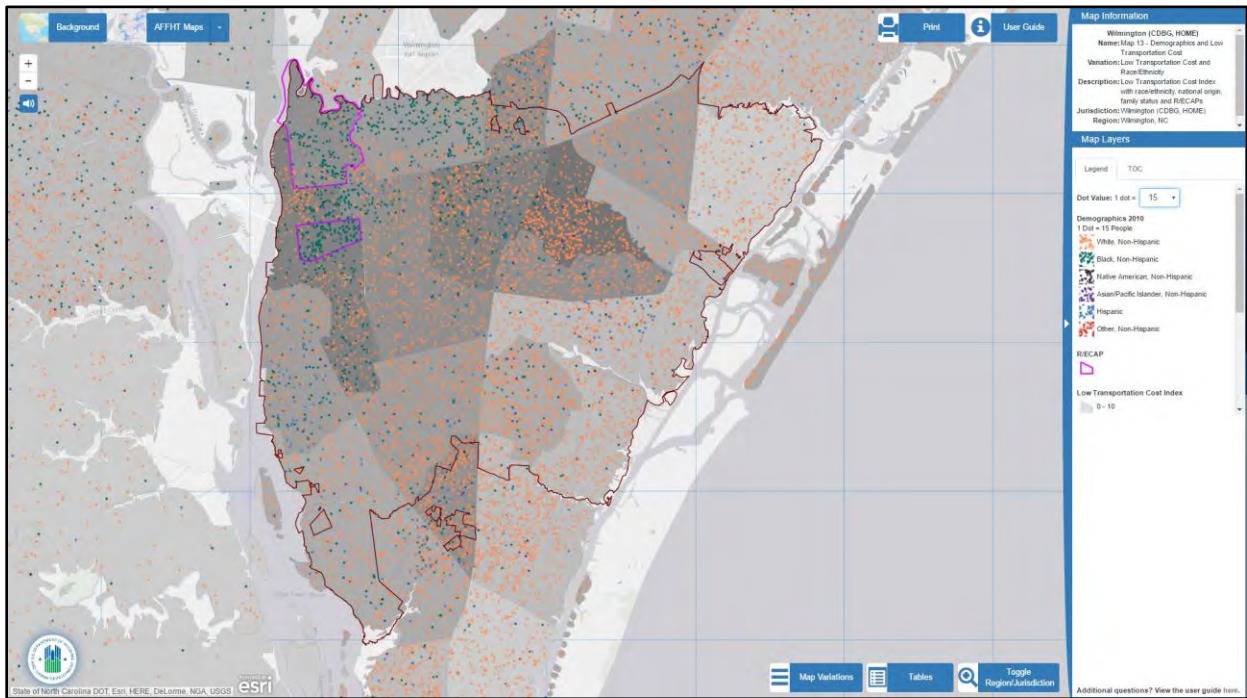
Source: American Community Survey 5-Year Survey 2009-2013 ; Decennial Census, 2010

HUD Map 12 – Demographics and Transit Trips (Section V.B.3 – Disparities in Access to Opportunity)



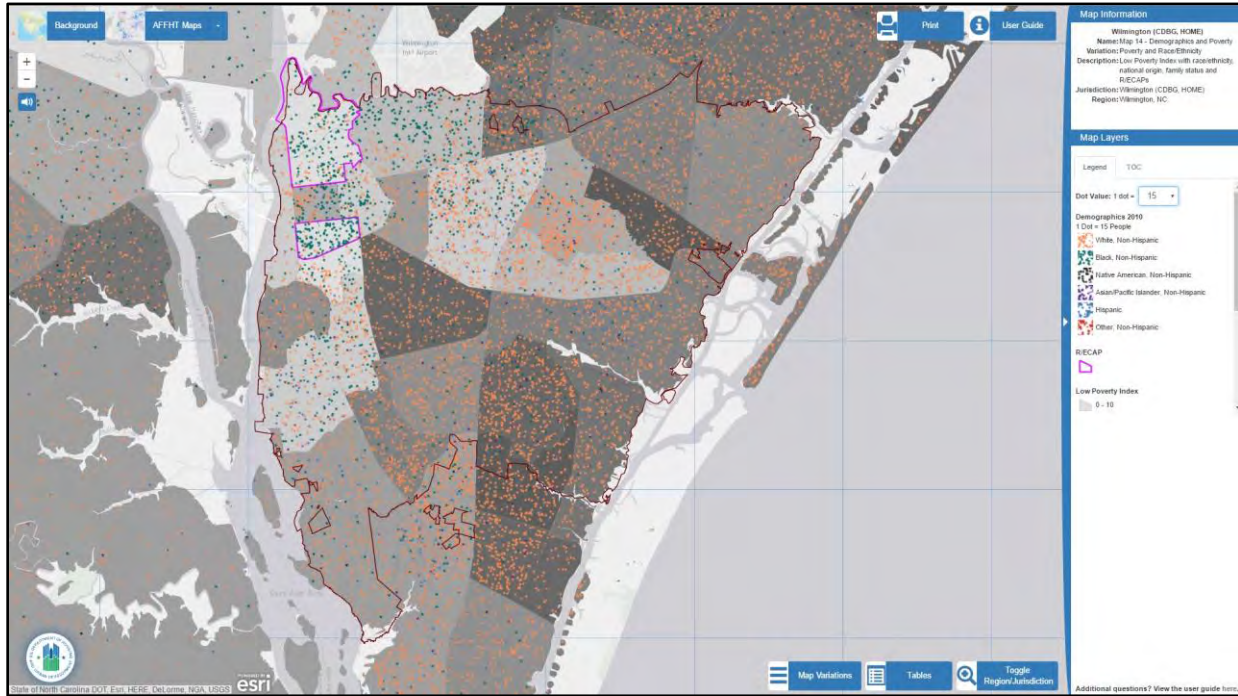
Source: Location Affordability Index data, 2008-2012; American Community Survey 5-Year Survey 2009-2013; Decennial Census, 2010

HUD Map 13 – Demographics and Transportation Cost (Section V.B.3 – Disparities in Access to Opportunity)



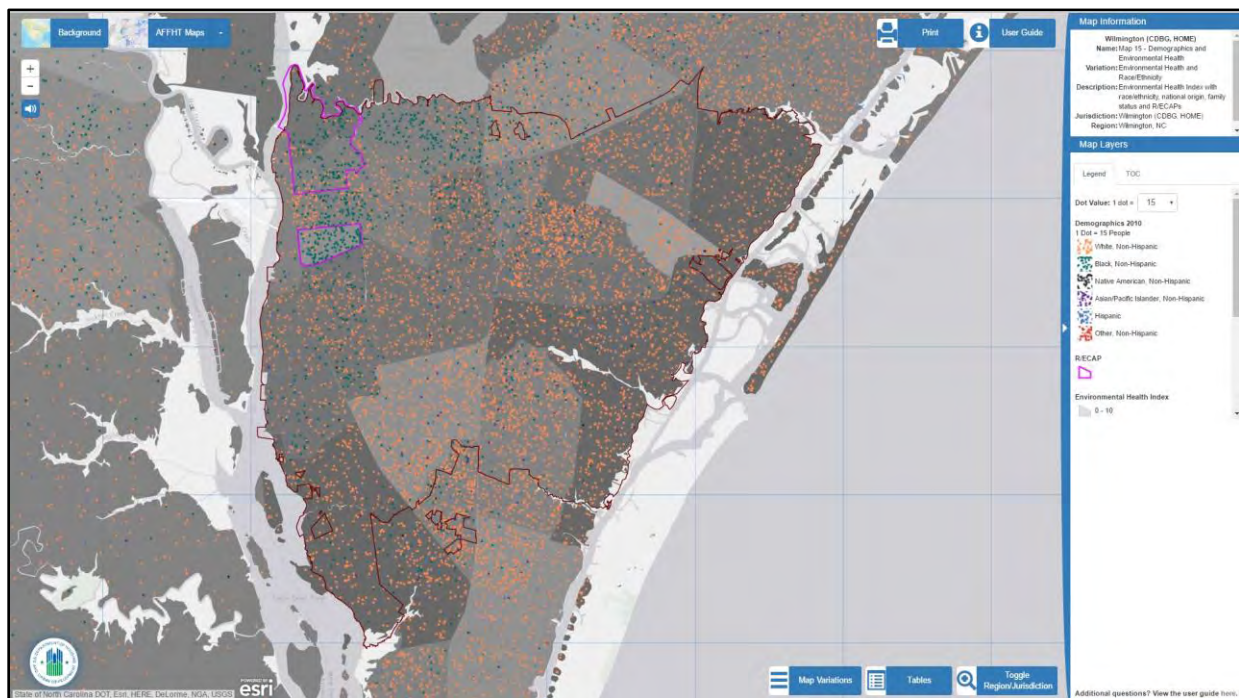
Source: Location Affordability Index data, 2008-2012; American Community Survey 5-Year Survey 2009-2013; Decennial Census, 2010

HUD Map 14 – Demographics and Poverty (Section V.B.3 and Section V.C.1 – Disparities in Access to Opportunity)



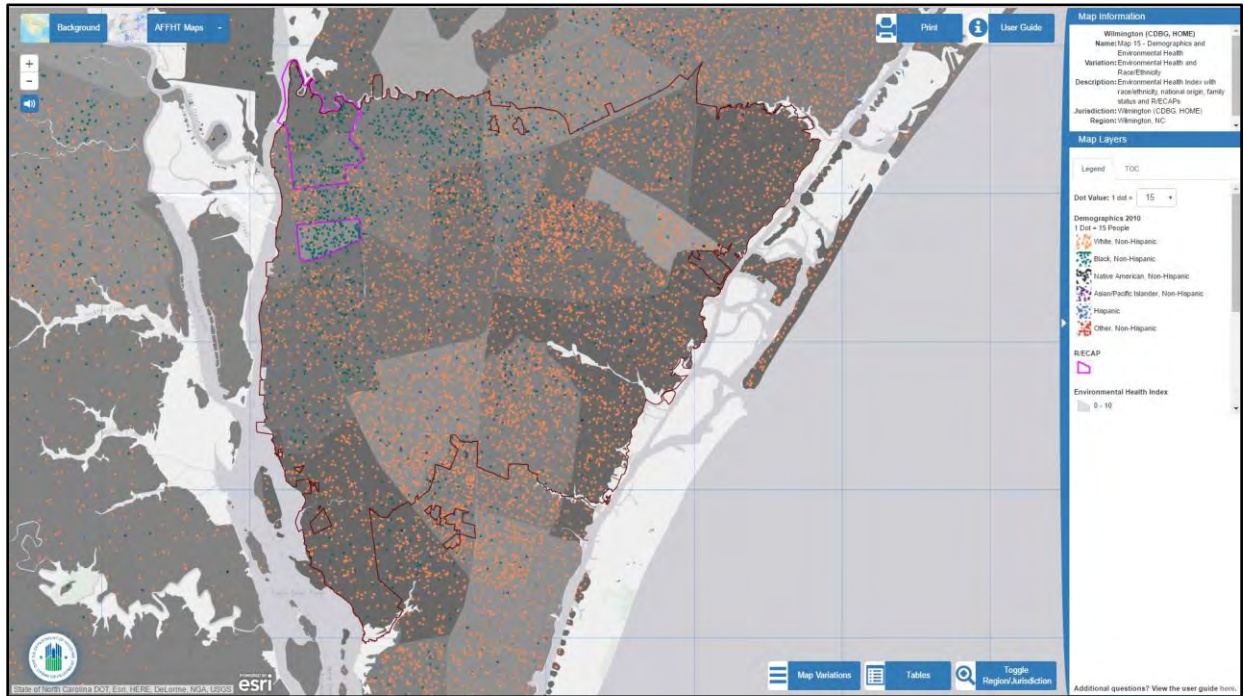
Source: American Community Survey 5-Year Survey 2009-2013; Decennial Census, 2010

HUD Map 15 – Demographics and Environmental Health (Section V.B.3 – Disparities in Access to Opportunity)



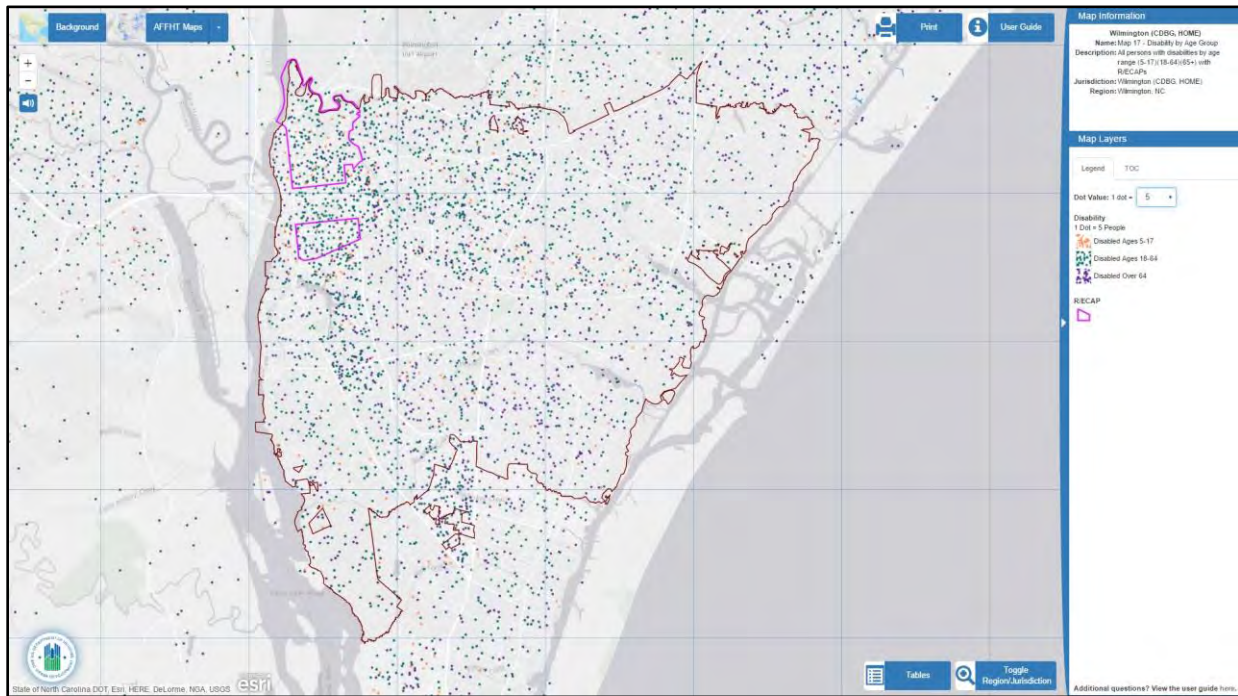
Source: National Air Toxics Assessment data, 2005; Decennial Census, 2010

HUD Map 16 – Disability by Type (Section V.C.2 – Disability and Access Analysis, Housing Accessibility)



Source: American Community Survey 2009-2013

HUD Map 17 – Disability by Age Group (Section V.C.2 – Disability and Access Analysis)



Source: American Community Survey 2009-2013

HUD Tables

**HUD Table 1 – Demographics
(Section V – Demographic Summary, General Issues)**

| Demographics | | | | | | |
|---------------------------------------------------|-------------------------------------------------|----------|----------|-------------------------------------|----------|----------|
| | (Wilmington, NC CDBG, HOME) Jurisdiction | | | (Wilmington, NC CBSA) Region | | |
| Race/Ethnicity | | # | % | | # | % |
| White, Non-Hispanic | | 77,998 | 71.26% | | 194,199 | 76.19% |
| Black, Non-Hispanic | | 21,056 | 19.24% | | 38,677 | 15.17% |
| Hispanic | | 6,592 | 6.02% | | 13,910 | 5.46% |
| Asian or Pacific Islander, Non-Hispanic | | 1,355 | 1.24% | | 2,696 | 1.06% |
| Native American, Non-Hispanic | | 390 | 0.36% | | 1,035 | 0.41% |
| Other, Non-Hispanic | | 196 | 0.18% | | 414 | 0.16% |
| National Origin | Country | # | % | Country | # | % |
| #1 country of origin | Mexico | 2,339 | 2.19% | Mexico | 5,035 | 1.98% |
| #2 country of origin | Honduras | 731 | 0.69% | Honduras | 960 | 0.38% |
| #3 country of origin | Canada | 299 | 0.28% | Germany | 518 | 0.20% |
| #4 country of origin | Germany | 229 | 0.21% | Canada | 461 | 0.18% |
| #5 country of origin | China excl. Hong Kong & Taiwan | 226 | 0.21% | China excl. Hong Kong & Taiwan | 434 | 0.17% |
| #6 country of origin | El Salvador | 223 | 0.21% | El Salvador | 416 | 0.16% |
| #7 country of origin | England | 207 | 0.19% | England | 413 | 0.16% |
| #8 country of origin | India | 184 | 0.17% | Vietnam | 380 | 0.15% |
| #9 country of origin | Burma | 160 | 0.15% | India | 358 | 0.14% |
| #10 country of origin | Vietnam | 138 | 0.13% | Other UK | 252 | 0.10% |
| Limited English Proficiency (LEP) Language | Language | # | % | Language | # | % |
| #1 LEP Language | Spanish | 3,590 | 3.47% | Spanish | 6,698 | 2.63% |

| | | | | | | |
|-------------------------------|----------------------|----------|----------|-----------------------|----------|----------|
| #2 LEP Language | Other Asian Language | 215 | 0.21% | Vietnamese | 301 | 0.12% |
| #3 LEP Language | Chinese | 166 | 0.16% | Chinese | 256 | 0.10% |
| #4 LEP Language | Vietnamese | 91 | 0.09% | Other Asian Language | 215 | 0.08% |
| #5 LEP Language | Gujarati | 64 | 0.06% | French | 135 | 0.05% |
| #6 LEP Language | Portuguese | 58 | 0.06% | Portuguese | 89 | 0.03% |
| #7 LEP Language | German | 49 | 0.05% | Gujarati | 77 | 0.03% |
| #8 LEP Language | French | 40 | 0.04% | German | 72 | 0.03% |
| #9 LEP Language | Arabic | 29 | 0.03% | Greek | 66 | 0.03% |
| #10 LEP Language | Serbo-Croatian | 25 | 0.02% | Other Slavic Language | 36 | 0.01% |
| Disability Type | | # | % | | # | % |
| Hearing difficulty | | 3,681 | 3.59% | | 9,749 | 4.04% |
| Vision difficulty | | 2,601 | 2.53% | | 5,634 | 2.34% |
| Cognitive difficulty | | 5,292 | 5.16% | | 11,888 | 4.93% |
| Ambulatory difficulty | | 7,696 | 7.50% | | 18,899 | 7.83% |
| Self-care difficulty | | 2,587 | 2.52% | | 6,283 | 2.60% |
| Independent living difficulty | | 4,814 | 4.69% | | 11,399 | 4.73% |
| Sex | | # | % | | # | % |
| Male | | 52,296 | 47.78% | | 124,403 | 48.81% |
| Female | | 57,152 | 52.22% | | 130,481 | 51.19% |
| Age | | # | % | | # | % |
| Under 18 | | 20,473 | 18.71% | | 52,302 | 20.52% |
| 18-64 | | 73,732 | 67.37% | | 166,604 | 65.36% |
| 65+ | | 15,243 | 13.93% | | 35,978 | 14.12% |
| Family Type | | # | % | | # | % |
| Families with children | | 10,293 | 41.66% | | 26,657 | 41.30% |

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Sources: Decennial Census; ACS

**HUD Table 2 – Demographic Trends
(Section V – Demographic Summary, Publicly Supported Housing Analysis)**

| Demographic Trends | | | | | | |
|-----------------------------------------|-------------------------------------------------|----------|-------------|----------|-------------|----------|
| | (Wilmington, NC CDBG, HOME) Jurisdiction | | | | | |
| | 1990 | | 2000 | | 2010 | |
| Race/Ethnicity | # | % | # | % | # | % |
| White, Non-Hispanic | 54,821 | 72.74% | 66,450 | 73.20% | 77,998 | 71.26% |
| Black, Non-Hispanic | 19,226 | 25.51% | 20,248 | 22.31% | 21,056 | 19.24% |
| Hispanic | 607 | 0.81% | 2,220 | 2.45% | 6,592 | 6.02% |
| Asian or Pacific Islander, Non-Hispanic | 381 | 0.51% | 1,077 | 1.19% | 1,355 | 1.24% |
| Native American, Non-Hispanic | 211 | 0.28% | 463 | 0.51% | 390 | 0.36% |
| National Origin | # | % | # | % | # | % |
| Foreign-born | 1,250 | 1.66% | 3,347 | 3.69% | 6,907 | 6.48% |
| LEP | # | % | # | % | # | % |
| Limited English Proficiency | 891 | 1.18% | 1,827 | 2.01% | 4,427 | 4.15% |
| Sex | # | % | # | % | # | % |
| Male | 34,759 | 46.06% | 42,823 | 47.22% | 52,296 | 47.78% |
| Female | 40,710 | 53.94% | 47,874 | 52.79% | 57,152 | 52.22% |
| Age | # | % | # | % | # | % |
| Under 18 | 16,615 | 22.02% | 18,761 | 20.69% | 20,473 | 18.71% |
| 18-64 | 48,035 | 63.65% | 59,088 | 65.15% | 73,732 | 67.37% |
| 65+ | 10,819 | 14.34% | 12,847 | 14.16% | 15,243 | 13.93% |
| Family Type | # | % | # | % | # | % |
| Families with children | 8,424 | 42.96% | 5,963 | 44.30% | 10,293 | 41.66% |
| (Wilmington, NC CBSA) Region | | | | | | |
| | 1990 | | 2000 | | 2010 | |
| | # | % | # | % | # | % |
| Race/Ethnicity | # | % | # | % | # | % |
| White, Non-Hispanic | 113,982 | 76.41% | 155,870 | 77.39% | 194,199 | 76.19% |
| Black, Non-Hispanic | 32,692 | 21.92% | 37,183 | 18.46% | 38,677 | 15.17% |
| Hispanic | 1,168 | 0.78% | 4,748 | 2.36% | 13,910 | 5.46% |
| Asian or Pacific Islander, Non-Hispanic | 628 | 0.42% | 1,785 | 0.89% | 2,696 | 1.06% |
| Native American, Non-Hispanic | 470 | 0.32% | 1,220 | 0.61% | 1,035 | 0.41% |
| National Origin | # | % | # | % | # | % |
| Foreign-born | 2,134 | 1.43% | 6,674 | 3.31% | 13,623 | 5.34% |
| LEP | # | % | # | % | # | % |
| Limited English | 1,642 | 1.10% | 3,879 | 1.93% | 8,199 | 3.22% |

| Proficiency | | | | | | |
|------------------------|----------|----------|----------|----------|----------|----------|
| Sex | # | % | # | % | # | % |
| Male | 71,109 | 47.68% | 98,078 | 48.70% | 124,403 | 48.81% |
| Female | 78,030 | 52.32% | 103,311 | 51.30% | 130,481 | 51.19% |
| Age | # | % | # | % | # | % |
| Under 18 | 34,405 | 23.07% | 44,507 | 22.10% | 52,302 | 20.52% |
| 18-64 | 95,556 | 64.07% | 130,648 | 64.87% | 166,604 | 65.36% |
| 65+ | 19,178 | 12.86% | 26,234 | 13.03% | 35,978 | 14.12% |
| Family Type | # | % | # | % | # | % |
| Families with children | 17,772 | 43.39% | 10,736 | 43.97% | 26,657 | 41.30% |

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.
Sources: Decennial Census; ACS

**HUD Table 3 – Racial/Ethnic Dissimilarity Trends
(Section V – Segregation/Integration)**

| Racial/Ethnic Dissimilarity Trends | | | | | | |
|-------------------------------------------|-------------------------------------------------|-------------|-------------|-------------------------------------|-------------|-------------|
| | (Wilmington, NC CDBG, HOME) Jurisdiction | | | (Wilmington, NC CBSA) Region | | |
| Racial/Ethnic Dissimilarity Index | 1990 | 2000 | 2010 | 1990 | 2000 | 2010 |
| Non-White/White | 57.81 | 49.12 | 49.04 | 48.77 | 42.88 | 43.57 |
| Black/White | 61.57 | 55.58 | 59.40 | 51.59 | 47.61 | 52.72 |
| Hispanic/White | 20.29 | 29.80 | 38.71 | 21.52 | 34.09 | 37.68 |
| Asian or Pacific Islander/White | 25.27 | 24.93 | 22.27 | 29.06 | 27.91 | 28.17 |

Sources: Decennial Census

**HUD Table 4 – R/ECAP Demographics
(Section V – R/ECAPs)**

| R/ECAP Demographics | | | | | | |
|-----------------------------------------|-------------------------------------------------|----------|----------|-------------------------------------|----------|----------|
| | (Wilmington, NC CDBG, HOME) Jurisdiction | | | (Wilmington, NC CBSA) Region | | |
| R/ECAP Race/Ethnicity | | # | % | | # | % |
| Total Population in R/ECAPs | | 6,814 | - | | 6,814 | - |
| White, Non-Hispanic | | 1,181 | 17.33% | | 1,181 | 17.33% |
| Black, Non-Hispanic | | 5,239 | 76.89% | | 5,239 | 76.89% |
| Hispanic | | 196 | 2.88% | | 196 | 2.88% |
| Asian or Pacific Islander, Non-Hispanic | | 14 | 0.21% | | 14 | 0.21% |
| Native American, Non-Hispanic | | 25 | 0.37% | | 25 | 0.37% |
| Other, Non-Hispanic | | 8 | 0.12% | | 8 | |
| R/ECAP Family Type | | | | | | |
| Total Families in R/ECAPs | | 1,482 | - | | 1,482 | - |
| Families with children | | 664 | 44.80% | | 664 | 44.80% |
| R/ECAP National Origin | Country | | | Country | | |
| Total Population in R/ECAPs | | 6,814 | - | | 6,814 | - |
| #1 country of origin | Jamaica | 30 | 0.44% | Jamaica | 30 | 0.44% |
| #2 country of origin | Chile | 16 | 0.23% | Chile | 16 | 0.23% |
| #3 country of origin | Mexico | 9 | 0.13% | Mexico | 9 | 0.13% |
| #4 country of origin | Netherlands | 9 | 0.13% | Netherlands | 9 | 0.13 |
| #5 country of origin | Other Eastern | 9 | 0.13% | Other Eastern | 9 | 0.13 |

| | | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---|-------|----------|---|------|
| | Europe | | | Europe | | |
| #6 country of origin | Other UK | 8 | 0.12% | Other UK | 8 | 0.12 |
| #7 country of origin | Denmark | 4 | 0.06% | Denmark | 4 | 0.06 |
| #8 country of origin | Null | 0 | 0.00% | Null | 0 | 0 |
| #9 country of origin | Null | 0 | 0.00% | Null | 0 | 0 |
| #10 country of origin | Null | 0 | 0.00% | Null | 0 | 0 |
| <p>Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately Source: Decennial Census; ACS</p> | | | | | | |

**HUD Table 6 – Publicly Supported Housing Residents by Race/Ethnicity
(Section V – Publicly Supported Housing Demographics)**

| Publicly Supported Housing Demographics | | | | | | | | |
|-------------------------------------------------------------------------------------------------------------------|----------------|--------|--------|--------|----------|-------|---------------------------|-------|
| (Wilmington, NC CDBG, HOME) Jurisdiction | Race/Ethnicity | | | | | | | |
| | White | | Black | | Hispanic | | Asian or Pacific Islander | |
| Housing Type | # | % | # | % | # | % | # | % |
| Public Housing | 53 | 6.06% | 806 | 92.22% | 11 | 1.26% | 1 | 0.11% |
| Project-Based Section 8 | 515 | 53.87% | 355 | 37.13% | 49 | 5.13% | 33 | 3.45% |
| Other Multifamily | 120 | 76.92% | 32 | 20.51% | 0 | 0.00% | 3 | 1.92% |
| HCV Program | 241 | 18.34% | 1,028 | 78.23% | 41 | 3.12% | 2 | 0.15% |
| 0-30% of AMI | 4,465 | 56.16% | 2,739 | 34.45% | 405 | 5.09% | 25 | 0.31% |
| 0-50% of AMI | 7,350 | 54.06% | 4,199 | 30.89% | 880 | 6.47% | 60 | 0.44% |
| 0-80% of AMI | 13,120 | 59.99% | 6,069 | 27.75% | 1,360 | 6.22% | 100 | 0.46% |
| (Wilmington, NC CDBG, HOME) Jurisdiction | 77,998 | 71.26% | 21,056 | 19.24% | 6,592 | 6.02% | 1,355 | 1.24% |
| <p>Sources: Decennial Census; APSH; CHAS Note 1: #s presented are numbers of households not individuals.</p> | | | | | | | | |

HUD Table 7 – R/ECAP and Non-RECAP Demographics by Publicly Supported Housing Program Category
(Section V – Publicly Supported Housing Demographics)

| R/ECAP and Non-RECAP Demographics by Publicly Supported Housing Program Category | | | | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------|-----------------------------|----------------|----------------|-------------------|------------------------------------|---------------------------------|
| (Wilmington, NC CDBG, HOME) Jurisdiction | Total # units (occupied) | % Elderly | % with a disability* | % White | % Black | % Hispanic | % Asian or Pacific Islander | % Families with children |
| Public Housing | | | | | | | | |
| R/ECAP tracts | 503 | 24.88% | 25.85% | 0.98% | 96.81% | 1.97% | 0.00% | 42.75% |
| Non R/ECAP tracts | 473 | 12.05% | 32.98% | 10.49% | 88.22% | 0.64% | 0.21% | 53.49% |
| Project-based Section 8 | | | | | | | | |
| R/ECAP tracts | | | | | | | | |
| Non R/ECAP tracts | 997 | 68.83% | 9.80% | 53.87% | 37.13% | 5.13% | 3.45% | 21.05% |
| Other HUD Multifamily | | | | | | | | |
| R/ECAP tracts | | | | | | | | |
| Non R/ECAP tracts | 163 | 93.04% | 6.96% | 76.92% | 20.51% | 0.00% | 1.92% | 0.00% |
| HCV Program | | | | | | | | |
| R/ECAP tracts | 392 | 23.74% | 25.70% | 7.32% | 89.30% | 3.10% | 0.28% | 51.96% |
| Non R/ECAP tracts | 1,082 | 15.93% | 26.55% | 22.42% | 74.14% | 3.13% | 0.10% | 46.59% |
| <p>Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household. Sources: APSH</p> | | | | | | | | |

HUD Table 8 – Demographics of Publicly Supported Housing Developments, by Program Category
(Section V – Publicly Supported Housing Demographics)

| Demographics of Publicly Supported Housing Developments, by Program Category | | | | | | |
|-------------------------------------------------------------------------------------|----------------|--------------|--------------|-----------------|--------------|---------------------------------|
| Public Housing | | | | | | |
| (Wilmington, NC CDBG) Jurisdiction | | | | | | |
| Development Name | # Units | White | Black | Hispanic | Asian | Households with Children |
| Creekwood South Lihtc | 138 | 4% | 95% | 0% | 0% | 81% |
| Scattered Sites | 7 | | | | | |
| New Brooklyn Homes At Taylor Estates | 48 | 4% | 94% | 2% | 0% | 77% |
| Houston Moore Terrace | 150 | 3% | 96% | 1% | 0% | 72% |
| Creekwood South | 60 | 0% | 95% | 5% | 0% | 83% |
| Rankin Pl. Ter., Vesta Village | 147 | 2% | 96% | 1% | 0% | 55% |
| Solomon Towers | 151 | 28% | 69% | 0% | 1% | 0% |
| Hillcrest | 256 | 1% | 95% | 3% | 0% | 27% |
| Hope Vi Phase Ii - Covil | 71 | 0% | 97% | 2% | 0% | 58% |
| Project-Based Section 8 | | | | | | |
| (Wilmington, NC CDBG) Jurisdiction | | | | | | |
| Development Name | # Units | White | Black | Hispanic | Asian | Households with Children |
| Tidewater Townhomes | 104 | 15% | 81% | 5% | 0% | 74% |
| North Cleveland Towers | 113 | 98% | 2% | 0% | 0% | 0% |
| Cape Fear Hotel Apartments | 91 | 64% | 36% | 0% | 0% | 0% |
| Burlington Manor Apts. | 125 | 82% | 16% | 0% | 1% | 0% |
| University Place | 150 | 88% | 10% | 1% | 1% | 1% |
| Market North Apts. | 204 | 13% | 83% | 2% | 0% | 69% |
| Glover Plaza | 75 | 43% | 53% | 4% | 0% | 0% |
| Yorkville Gardens | 132 | 35% | 10% | 30% | 25% | 0% |
| Hadden Hall I | 40 | 82% | 13% | 0% | 0% | 0% |

| Other HUD Multifamily Assisted Housing | | | | | | |
|-------------------------------------------------------------------------------------|----------------|--------------|--------------|-----------------|--------------|---------------------------------|
| (Wilmington, NC CDBG) Jurisdiction | | | | | | |
| Development Name | # Units | White | Black | Hispanic | Asian | Households with Children |
| Ahepa 408 Apartments | 50 | 56% | 42% | 0% | 2% | 0% |
| Woodview Court, Hilliard | 61 | 91% | 4% | 0% | 4% | 0% |
| As New Hanover Co. G.H. #1 | 7 | | | | | |
| As New Hanover Co. G.H. #2 | 7 | | | | | |
| Hadden Hall li | 40 | 76% | 24% | 0% | 0% | 0% |
| Note 1: For LIHTC properties, this information will be supplied by local knowledge. | | | | | | |
| Note 2: Percentages may not add to 100 due to rounding error. | | | | | | |
| Sources: APSH | | | | | | |

HUD Table 9 – Demographics of Households with Disproportionate Housing Needs (Section V – Disproportionate Housing Needs)

| Demographics of Households with Disproportionate Housing Needs | | | | | | |
|-----------------------------------------------------------------------|-------------------------------------------------|---------------------|------------------------|-------------------------------------|---------------------|------------------------|
| Disproportionate Housing Needs | (Wilmington, NC CDBG, HOME) Jurisdiction | | | (Wilmington, NC CBSA) Region | | |
| | # with problems | # households | % with problems | # with problems | # households | % with problems |
| Households experiencing any of 4 housing problems* | | | | | | |
| Race/Ethnicity | | | | | | |
| White, Non-Hispanic | 13,555 | 34,835 | 38.91% | 29,370 | 84,430 | 34.79% |
| Black, Non-Hispanic | 4,890 | 8,364 | 58.46% | 7,365 | 14,709 | 50.07% |
| Hispanic | 1,225 | 1,855 | 66.04% | 2,109 | 3,783 | 55.75% |
| Asian or Pacific Islander, Non-Hispanic | 145 | 355 | 40.85% | 275 | 850 | 32.35% |
| Native American, Non-Hispanic | 40 | 100 | 40.00% | 80 | 290 | 27.59% |
| Other, Non-Hispanic | 500 | 725 | 68.97% | 755 | 1,365 | 55.31% |

| | | | | | | |
|-------------------------------------------------------------------|-------------------------------|---------------------|-------------------------------|-------------------------------|---------------------|-------------------------------|
| <i>Total</i> | <i>20,345</i> | <i>46,225</i> | <i>44.01%</i> | <i>39,955</i> | <i>105,405</i> | <i>37.91%</i> |
| Household Type and Size | | | | | | |
| Family households, <5 people | 7,820 | 22,370 | 34.96% | 17,840 | 58,960 | 30.26% |
| Family households, 5+ people | 965 | 1,675 | 57.61% | 2,245 | 5,480 | 40.97% |
| Non-family households | 11,565 | 22,190 | 52.12% | 19,865 | 40,960 | 48.50% |
| Households experiencing any of 4 Severe Housing Problems** | # with severe problems | # households | % with severe problems | # with severe problems | # households | % with severe problems |
| Race/Ethnicity | | | | | | |
| White, Non-Hispanic | 7,550 | 34,835 | 21.67% | 14,505 | 84,430 | 17.18% |
| Black, Non-Hispanic | 2,945 | 8,364 | 35.21% | 4,459 | 14,709 | 30.31% |
| Hispanic | 680 | 1,855 | 36.66% | 1,294 | 3,783 | 34.21% |
| Asian or Pacific Islander, Non-Hispanic | 130 | 355 | 36.62% | 195 | 850 | 22.94% |
| Native American, Non-Hispanic | 40 | 100 | 40.00% | 40 | 290 | 13.79% |
| Other, Non-Hispanic | 278 | 725 | 38.34% | 439 | 1,365 | 32.16% |
| <i>Total</i> | <i>11,625</i> | <i>46,225</i> | <i>25.15%</i> | <i>20,925</i> | <i>105,405</i> | <i>19.85%</i> |

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

**HUD Table 10 – Demographics of Households with Severe Housing Cost Burden
(Section V – Disproportionate Housing Needs)**

| Demographics of Households with Severe Housing Cost Burden | | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|---------------------|----------------------------------|-------------------------------------|---------------------|----------------------------------|
| Households with Severe Housing Cost Burden* | (Wilmington, NC CDBG, HOME) Jurisdiction | | | (Wilmington, NC CBSA) Region | | |
| Race/Ethnicity | # with severe cost burden | # households | % with severe cost burden | # with severe cost burden | # households | % with severe cost burden |
| White, Non-Hispanic | 6,875 | 34,835 | 19.74% | 13,160 | 84,430 | 15.59% |
| Black, Non-Hispanic | 2,620 | 8,364 | 31.32% | 3,870 | 14,709 | 26.31% |
| Hispanic | 450 | 1,855 | 24.26% | 760 | 3,783 | 20.09% |
| Asian or Pacific Islander, Non-Hispanic | 90 | 355 | 25.35% | 115 | 850 | 13.53% |
| Native American, Non-Hispanic | 40 | 100 | 40.00% | 40 | 290 | 13.79% |
| Other, Non-Hispanic | 245 | 725 | 33.79% | 395 | 1,365 | 28.94% |
| <i>Total</i> | <i>10,320</i> | <i>46,225</i> | <i>22.33%</i> | <i>18,340</i> | <i>105,405</i> | <i>17.40%</i> |
| Household Type and Size | | | | | | |
| Family households, <5 people | 3,480 | 22,370 | 15.56% | 7,230 | 58,960 | 12.26% |
| Family households, 5+ people | 375 | 1,675 | 22.39% | 855 | 5,480 | 15.60% |
| Non-family households | 6,485 | 22,190 | 29.22% | 10,250 | 40,960 | 25.02% |
| <p>Note 1: Severe housing cost burden is defined as greater than 50% of income. Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems. Sources: CHAS</p> | | | | | | |

**HUD Table 11 – Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children
(Section V – Disproportionate Housing Needs)**

| Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children | | | | | | | | |
|-----------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------|--------------------------------------|----------|---------------------------------------|----------|---------------------------------|----------|
| | (Wilmington, NC CDBG, HOME) Jurisdiction | | | | | | | |
| | Households in 0-1 Bedroom Units | | Households in 2 Bedroom Units | | Households in 3+ Bedroom Units | | Households with Children | |
| Housing Type | # | % | # | % | # | % | # | % |
| Public Housing | 209 | 23.56% | 290 | 32.69% | 381 | 42.95% | 430 | 48.48% |
| Project-Based Section 8 | 663 | 68.42% | 157 | 16.20% | 144 | 14.86% | 204 | 21.05% |
| Other Multifamily | 158 | 100.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| HCV Program | 229 | 16.89% | 639 | 47.12% | 456 | 33.63% | 651 | 48.01% |
| Note 1: Data Sources: APSH | | | | | | | | |

**HUD Table 12 – Opportunity Indicators, by Race/Ethnicity
(Section V – Disproportionate in Access to Opportunity)**

| Opportunity Indicators, by Race/Ethnicity | | | | | | | |
|--------------------------------------------------|--------------------------|---------------------------------|---------------------------|----------------------|--------------------------------------|-----------------------------|-----------------------------------|
| (Wilmington, NC CDBG, HOME) Jurisdiction | Low Poverty Index | School Proficiency Index | Labor Market Index | Transit Index | Low Transportation Cost Index | Jobs Proximity Index | Environmental Health Index |
| Total Population | | | | | | | |
| White, Non-Hispanic | 51.30 | 50.08 | 64.06 | 37.39 | 47.47 | 56.09 | 70.87 |
| Black, Non-Hispanic | 21.55 | 25.35 | 36.05 | 43.07 | 55.86 | 56.49 | 67.77 |
| Hispanic | 36.70 | 43.82 | 52.82 | 38.36 | 50.31 | 64.97 | 72.62 |
| Asian or Pacific Islander, Non-Hispanic | 52.71 | 53.12 | 64.41 | 38.12 | 48.30 | 53.56 | 69.82 |
| Native American, Non-Hispanic | 38.55 | 40.31 | 53.73 | 39.25 | 51.40 | 61.39 | 70.49 |
| Population below federal poverty line | | | | | | | |
| White, Non-Hispanic | 38.68 | 34.49 | 56.38 | 40.21 | 55.14 | 58.60 | 70.46 |
| Black, Non-Hispanic | 14.95 | 19.40 | 29.78 | 44.17 | 57.19 | 50.41 | 67.94 |
| Hispanic | 28.72 | 40.12 | 43.73 | 42.73 | 54.91 | 64.85 | 71.38 |
| Asian or Pacific Islander, Non-Hispanic | 27.98 | 20.87 | 48.01 | 46.67 | 66.85 | 57.72 | 71.15 |
| Native American, Non-Hispanic | 39.72 | 35.67 | 45.86 | 36.95 | 49.57 | 46.93 | 67.80 |

| (Wilmington, NC CBSA) Region | Low Poverty Index | School Proficiency Index | Labor Market Index | Transit Index | Low Transportation Cost Index | Jobs Proximity Index | Environmental Health Index |
|----------------------------------------------------------------------------------------------------------|--------------------------|---------------------------------|---------------------------|----------------------|--------------------------------------|-----------------------------|-----------------------------------|
| Total Population | | | | | | | |
| White, Non-Hispanic | 55.11 | 56.85 | 59.68 | 29.82 | 33.23 | 45.53 | 67.73 |
| Black, Non-Hispanic | 31.01 | 34.82 | 37.20 | 33.05 | 40.01 | 48.52 | 67.34 |
| Hispanic | 41.74 | 48.25 | 48.92 | 31.07 | 36.49 | 49.94 | 70.04 |
| Asian or Pacific Islander, Non-Hispanic | 59.88 | 59.18 | 64.23 | 32.22 | 37.67 | 45.89 | 67.45 |
| Native American, Non-Hispanic | 46.01 | 48.76 | 50.26 | 29.47 | 34.49 | 47.72 | 67.57 |
| Population below federal poverty line | | | | | | | |
| White, Non-Hispanic | 45.45 | 45.15 | 54.30 | 32.55 | 40.93 | 49.41 | 67.53 |
| Black, Non-Hispanic | 18.24 | 25.64 | 28.70 | 37.16 | 46.30 | 47.48 | 67.24 |
| Hispanic | 31.55 | 45.02 | 41.66 | 36.83 | 41.95 | 54.37 | 69.93 |
| Asian or Pacific Islander, Non-Hispanic | 32.13 | 24.85 | 49.43 | 44.85 | 62.64 | 54.24 | 70.86 |
| Native American, Non-Hispanic | 43.80 | 38.81 | 47.95 | 32.94 | 42.93 | 43.69 | 65.88 |
| Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA | | | | | | | |

HUD Table 13 – Disability by Type
(Section V – Demographic Summary and Publicly Supported Housing Analysis)

| Disability by Type | | | | |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------|-------------------------------------|----------|
| | (Wilmington, NC CDBG, HOME) Jurisdiction | | (Wilmington, NC CBSA) Region | |
| Disability Type | # | % | # | % |
| Hearing difficulty | 3,681 | 3.59% | 9,749 | 4.04% |
| Vision difficulty | 2,601 | 2.53% | 5,634 | 2.34% |
| Cognitive difficulty | 5,292 | 5.16% | 11,888 | 4.93% |
| Ambulatory difficulty | 7,696 | 7.50% | 18,899 | 7.83% |
| Self-care difficulty | 2,587 | 2.52% | 6,283 | 2.60% |
| Independent living difficulty | 4,814 | 4.69% | 11,399 | 4.73% |
| Note 1: All % represent a share of the total population within the jurisdiction or region. Sources: ACS | | | | |

HUD Table 15 – Disability by Publicly Supported Housing Program Category
(Section V – Housing Accessibility)

| Disability by Publicly Supported Housing Program Category | | |
|------------------------------------------------------------------|----------------------------------|----------|
| (Wilmington, NC CDBG, HOME) Jurisdiction | People with a Disability* | |
| | # | % |
| Public Housing | 263 | 29.65% |
| Project-Based Section 8 | 95 | 9.80% |
| Other Multifamily | 11 | 6.96% |
| HCV Program | 357 | 26.33% |

| (Wilmington, NC CBSA) Region | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------|
| Public Housing | 263 | 29.65% |
| Project-Based Section 8 | 115 | 10.92% |
| Other Multifamily | 11 | 6.96% |
| HCV Program | 526 | 23.92% |
| <p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs. Sources: ACS</p> | | |

COLLABORATION AGREEMENT

BETWEEN

City of Wilmington, North Carolina

AND

Housing Authority of the City of Wilmington, North Carolina

FOR

THE 2016 ASSESSMENT OF FAIR HOUSING

For the period

July 1, 2017 – June 30, 2021

THIS AGREEMENT, entered this 21st day of September, 2016 by City of Wilmington, North Carolina (herein called the "City") and Housing Authority of the City of Wilmington, North Carolina (herein called the "WHA ") (collectively referred to as "Program Participants").

WHEREAS, City of Wilmington, North Carolina, is a consolidated plan program participant with a program year start date of July 1. City of Wilmington's next 5-year consolidated plan cycle will begin in July 1, 2017.

WHEREAS, Housing Authority of the City of Wilmington, North Carolina, is a public housing authority (PHA) with a fiscal year beginning date of April 1. Housing Authority of the City of Wilmington's (name of PHA) next 5-year PHA plan will begin in 2017.

WHEREAS, the Program Participants are subject to the affirmatively furthering fair housing requirements found at 24 CFR §§5.150 through 5.180 and required to submit an Assessment of Fair Housing (AFH); and

WHEREAS, the Program Participants wish to collaborate to submit the AFH;

NOW, THEREFORE, it is agreed between the parties hereto that:

LEAD ENTITY

City of Wilmington, North Carolina will serve as the lead entity of the collaboration and will be responsible for submitting the joint or regional AFH on behalf of all the collaborating Program Participants.

PROGRAM YEAR/FISCAL YEAR ALIGNMENT

Collaborating Program Participants will, to the extent practicable, align their consolidated plan program year start date(s) and/or PHA plan fiscal year beginning date(s) in accordance

with the regulations at 24 CFR 91.10, for consolidated plan program participants, or 24 CFR part 903, for PHAs. If alignment of program year(s) or fiscal year(s) is not possible, the AFH will be submitted in accordance with the lead entity's consolidated plan program year start date.

CONSOLIDATED PLANNING/PHA PLANNING CYCLE ALIGNMENT

Collaborating Program Participants will, to the extent practicable, align their consolidated planning cycle(s) and/or PHA planning cycle(s) in accordance with the regulations at 24 CFR part 91, for consolidated plan program participants, or 24 CFR part 903, for PHAs. If alignment of consolidated planning cycle(s) or PHA planning cycle(s) is not possible, the AFH will be submitted in accordance with the lead entity's consolidated plan cycle.

ROLES/RESPONSIBILITIES OF PROGRAM PARTICIPANTS

Assessment of Fair Housing

Collaborating program participants will divide the completion of the AFH. The responsibilities of the Program Participants are as follows:

City of Wilmington will be responsible for the follow:

- Completing all necessary activities to complete the Assessment of Fair Housing sections as follows:
 - I. Cover Sheet
 - II. Executive Summary
 - III. Community Participation Process
 - IV. Assessment of Past Goals and Actions for City of Wilmington
 - V. Fair Housing Analysis
 - A. Demographic Summary
 - B. General Issues
 - i. Segregation/Integration
 - ii. Racially or Ethnically Concentrated Areas of Poverty
 - iii. Disparities in Access to Opportunity
 - iv. Disproportionate Housing Needs
 - C. Publicly Supported Housing Analysis
 - D. Disability and Access Analysis
 - E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis
 - VI. Fair Housing Goals and Priorities
- Activities required to successfully complete the Assessment of Fair Housing Tool include, but are not limited to, gathering public input from various stakeholders, compiling local plans, data, and other information, and performing analysis of HUD provided and other data. Additionally, as the lead entity, the City will be responsible for coordinating with stakeholder groups, community and civic organizations, representatives of local jurisdictions, and others to meet requirements for the AFH in accordance with the AFFH rule.

- The City will follow the adopted Citizen Participation Plan as required to provide for public notice, public hearing and public comment periods in accordance with HUD regulations (24 CFR Part 91.100 and 91.105)

Housing Authority of the City of Wilmington, North Carolina will be responsible for the following:

- Assigning staff member(s) to serve on the AFH committee to work with City and consultants to prepare AFH
- Completing the Publicly Supported Housing Analysis for the units owned, managed, or assisted through vouchers by WHA and its related entities in the Assessment of Fair Housing Tool and providing analysis to City of Wilmington for inclusion in the AFH. The analysis shall include responses to the questions and directives found in the AFH Tool section C:
 - o C. Publicly Supported Housing Analysis:
 - 1. Analysis; a. Publicly Supported Housing Demographics; b. Publicly Supported Housing Location and Occupancy; c. Disparities in Access to Opportunity;
 - 2. Additional Information as needed and obtainable;
 - 3. Contributing Factors – of Publicly Supported Housing Location and Occupancy
- Arranging and assisting with meetings as needed with WHA Resident Advisory Board, which includes representatives from WHA housing located in R/ECAPS to gather input/consult regarding issues and concerns relevant to AFH

Program Participants will be accountable for any applicable analysis and any applicable joint goals and priorities to be included in the submitted AFH. Program Participants will also be accountable for their individual analysis, goals and priorities to be included in the submitted AFH.

WITHDRAWAL

CITY or WHA shall have the right to terminate this Agreement at any time and without cause upon thirty (30) days written notice to the other party

The withdrawing Program Participant must promptly notify HUD of its withdrawal from the collaboration.

SEVERABILITY

If any provision of this Agreement is held invalid, the remainder of the Agreement shall not be affected thereby and all other parts of this Agreement shall nevertheless be in full force and effect.

SECTION HEADINGS AND SUBHEADINGS

The section headings and subheadings contained in this Agreement are included for convenience only and shall not limit or otherwise affect the terms of this Agreement.

WAIVER

A Program Participant's failure to act with respect to a breach by another Program Participant does not waive its right to act with respect to subsequent or similar breaches. The failure of the Program Participant to exercise or enforce any right or provision shall not constitute a waiver of such right or provision.

ENTIRE AGREEMENT

This Agreement between the Program Participants for the submission of the 2016 AFH, supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between the Program Participants with respect to this Agreement. By way of signing this agreement, the Program Participants are bound to perform the agreements within this agreement. Any amendment to this agreement must be submitted to HUD.

Date September 21, 2016

IN WITNESS WHEREOF, the Parties have executed this contract as of the date first written above.

CITY OF WILMINGTON, NORTH CAROLINA

By:

Sterling B. Cheatham

Sterling B. Cheatham, City Manager

APPROVED AS TO FORM:

William E. Wolak

William E. Wolak, City Attorney



STATE OF NORTH CAROLINA

COUNTY OF NEW HANOVER

I, *Christine L. Compton*, a Notary Public in *Brunswick* County, North Carolina certify that Sterling B. Cheatham personally appeared before me this day and acknowledged that he is the City Manager of the City of Wilmington, a North Carolina Municipal Corporation, and that by authority duly given and as the act of the City of Wilmington, the foregoing instrument was signed in its named by him as its Manager.

WITNESS my hand and notarial seal, this the *21ST* day of *September*, 20 *16*.

Christine L. Compton
Notary Public

My Commission Expires:

June 7, 2019

[SEAL]

HOUSING AUTHORITY OF THE CITY OF WILMINGTON, NC:

Katrina H. Redmon

Katrina H. Redmon, Chief Executive Officer

STATE OF NORTH CAROLINA

COUNTY OF NEW HANOVER

I, Karen A. Schraml, a Notary Public of the County and State aforesaid, certify that Katrina H. Redmon, either being personally known to me or proven by satisfactory evidence, personally came before me this day and acknowledged that she is the Chief Executive Officer of the HOUSING AUTHORITY OF THE CITY OF WILMINGTON, NORTH CAROLINA, and that she being authorized to do so, voluntarily executed the foregoing on behalf of said company for the purposes state therein.

WITNESS my hand and official stamp or seal, this 8th day of September, 2016.

Karen a. Schraml

Notary Public

My commission expires:

February 4, 2019





CITY of WILMINGTON North Carolina

**P.O. BOX 1810
28402**

OFFICE OF THE CITY MANAGER
(910) 341-7810
FAX(910)341-5839
TDD (910)341-7873

9/6/2016

City Council
City Hall
Wilmington, North Carolina 28401

Dear Mayor and Councilmembers:

Attached for your consideration is a resolution authorizing a collaborative agreement between the City of Wilmington and the Housing Authority of Wilmington, NC (WHA) in preparing an Assessment of Fair Housing (AFH).

The City of Wilmington is a Participating Jurisdiction in the U.S. Department of Housing and Urban Development (HUD) CDBG and HOME programs. As a CDBG recipient the City is required to prepare an Assessment of Fair Housing (AFH). The AFH is an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and is conducted and submitted to HUD using the Assessment Tool.

As a recipient of federal funds WHA, likewise, is required to prepare an AFH. Under the new Affirmatively Furthering Fair Housing (AFFH) rule, HUD encourages collaboration for the completion of the AFH so that program participants are able to share resources and consider fair housing issues from a broader perspective.

HUD requires collaborating program participants to designate, through express written consent, one participant as the lead entity to oversee the submission of the joint AFH on behalf of all the collaborating program participants. The City will serve as the lead entity in order to meet the submittal deadline for the AFH, which is due October 4, 2016, for the City of Wilmington.

The collaboration agreement between the City and WHA on the AFH furthers the City Council's Strategic Plan, specifically the Focus Area of Provide Sustainability and Adaptability. The consequence of not authorizing the Collaboration Agreement would be failing to take advantage of the opportunity to join efforts with the WHA to meet the AFH requirement from HUD.

Passage of the attached Resolution is recommended.

Respectfully submitted,

Sterling B. Cheatham,
City Manager

Resolution



City Council
City of Wilmington
North Carolina

Introduced By: Sterling B. Cheatham, City Manager

Date: 9/6/2016

Resolution Authorizing the City Manager to enter into a Collaboration Agreement with the Housing Authority of Wilmington, NC for the preparation of an Assessment of Fair Housing

LEGISLATIVE INTENT/PURPOSE:

Both the City of Wilmington and the Housing Authority of Wilmington, NC (WHA) are recipients of federal funds and program participants of the U. S. Department of Housing and Urban Development (HUD); and both are required to prepare an Assessment of Fair Housing (AFH) under the Affirmatively Furthering Fair Housing rule.

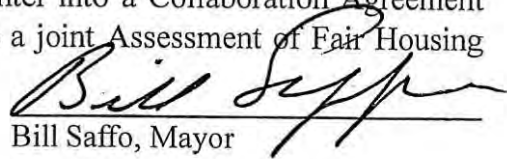
AFH is a standardized form that program participants will use to conduct their analysis and submit to HUD for review and acceptance. Program participants will also be provided with data and tools to inform the analysis. Guided by the Assessment Tool, program participants will analyze the fair housing issues specific to their jurisdiction and region, and set priorities and goals that will be used to establish strategies and actions in subsequent planning processes.

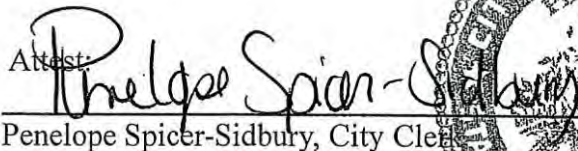
HUD encourages collaboration in preparing the AFH whenever possible. The City of Wilmington and the WHA have agreed to collaborate on the development of the AFH. HUD requires collaborating program participants to designate, through express written consent, one participant as the lead entity to oversee the submission of the joint AFH on behalf of all the collaborating program participants. The City will serve as the lead entity in order to meet the October 4, 2016, AFH submittal deadline for the City of Wilmington.

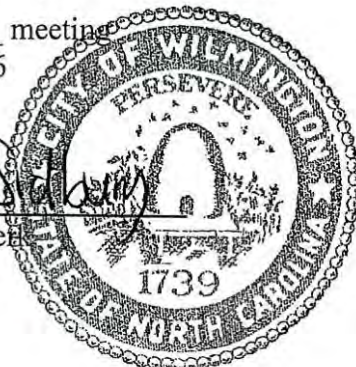
THEREFORE, BE IT RESOLVED:

THAT, the City Council authorizes the City Manager to enter into a Collaboration Agreement with the Housing Authority of Wilmington, NC to prepare a joint Assessment of Fair Housing with the City of Wilmington serving as the lead entity.

Adopted at a regular meeting
on September 6, 2016


Bill Saffo, Mayor

Attest:

Penelope Spicer-Sidbury, City Clerk



CITY CLERK
CONTINUED TO BE A JUNE 2017
Penelope Spicer-Sidbury

AFFIDAVIT OF PUBLICATION

STATE OF NORTH CAROLINA
COUNTY OF NEW HANOVER

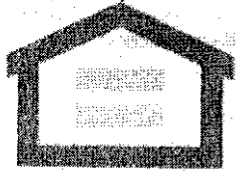
The City of Wilmington
Announces the
Availability for Public Comment
Of the City's
Assessment of Fair Housing
September 2, 2016- October 2,
2016

At the City's
Community Development Division
Office
305 Chestnut Street
Wilmington, NC
Second Floor
Or

www.wilmingtonnc.gov/department/s/community-services/housing
Public Hearing will be held at City
Council meeting
on September 20, 2016
For additional information, please
contact

Suzanne Rogers, Community De-
velopment & Housing Planner
Community Services Department
suzanne.rogers@wilmingtonnc.gov
(910) 341-7836

Or TDD # (910) 341-7873
The City of Wilmington does not
discriminate on the basis of race,
sex, color, national origin, religion
or disability in its employment op-
portunities, programs or activities.
All requests for appropriate auxil-
iary aids and services, when neces-
sary to offer a person with a disabil-
ity the opportunity to participate in
or enjoy the benefits of City ser-
vices, programs or activities must
be made within a reasonable time
prior to the activity.



EQUAL HOUSING
OPPORTUNITY

Before the undersigned, a Notary Public of Said County and State.

Jarimy Springer

Who, being duly sworn or affirmed, according to the law, says that he/she is

Accounting Specialist

of THE STARNEWS, a corporation organized and doing business under the Laws of the State of North Carolina, and publishing a newspaper known as STAR-NEWS in the City of Wilmington

The City of Wilmington Announces the Availability for Public Comment Of the City's Assessment of Fair Housing September 2, 2016- October 2, 2016 At the City's Community Development Division Office 305 Chestnut Street

was inserted in the aforesaid newspaper in space, and on dates as follows:

9/2/2016

And at the time of such publication Star-News was a newspaper meeting all the requirements and qualifications prescribed by Sec. No. 1-597 G.S. of N.C.

Title: Accounting Specialist

Sworn or affirmed to, and subscribed before me this 27th day of September, A.D., 2016

In Testimony Whereof, I have hereunto set my hand and ~~affixed my official seal~~ the day and year aforesaid.



TANYA V. WRIGHT
NOTARY PUBLIC
NORTH CAROLINA
NEW HANOVER COUNTY
MY COMM. EXP. 12/21 Public

My commission expires 12 day of Jan, 2021

Upon reading the foregoing affidavit with the advertisement thereto annexed it is adjudged by the Court that the said publication was duly and properly made and that the summons has been duly and legally served on the defendant(s).

This _____ day of _____

Clerk of Superior Court

MAIL TO:

Public Comments received City of Wilmington Assessment of Fair Housing 9/2/16 10/2/16

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Comments received 9/20/16 Public Hearing as paraphrased by Suzanne Rogers

Link to Video Recording of public hearing and comments.

http://wilmington.granicus.com/MediaPlayer.php?publish_id=87203ed7-7ffa-11e6-8170-f04da2064c47

?

Mr. Davis:

My back is broken over all these tax things. Our city limits go almost down to Carolina Beach, but when you go north on market street there is some land and those folks don't have a vote in the city. Why not? That area could use 3500-4500 houses, like the ones over at Greenfield Village. Guarantee they would be full in a month. Why doesn't HUD go over there and build houses outside the city limits. Let's leave the city taxpayer out of this.

Mr. Sparks:

I looked at this report with great interest. What I heard from this presentation and from reviewing this report is that Wilmington is segregated. The AFH is a tool that can be used when discussing and deciding on policy and plans for housing and jobs. The AFH reinforces what I already know, why is Wilmington segregated... I've been Black all my life. Now we have data that can show us where to focus our efforts. The AFH has teeth. HUD is going to ask how have you used funds to Affirmatively Further Fair Housing? I commend City Council on the AFH and hope the City will use this assessment positively. When people are spending over 35% of their income on shelter something needs to be done to address this problem. Thank you.

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Staff response:

The City of Wilmington does not have jurisdiction outside the city limits. CDBG and HOME funds are used within the city limits. There is a demand for affordable housing. The Greenfield Village development is a cooperative and provides affordable housing.

The AFH is a useful tool for directing the use of resources to Affirmatively Further Fair Housing. The city has developed goals and intends to implement the goals of the plan to address the Fair Housing issues identified in the AFH.

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Resolution



City Council
City of Wilmington
North Carolina

Introduced By: Sterling B. Cheatham, City Manager

Date: 9/20/2016

Resolution Authorizing City Manager to Submit Assessment of Fair Housing to U.S. Department of Housing and Urban Development

LEGISLATIVE INTENT/PURPOSE:

As an entitlement city receiving funds from the U.S. Department of Housing and Urban Development (HUD) the City of Wilmington is required to conduct and submit to HUD an Assessment of Fair Housing (AFH) that identifies, at a minimum, certain types of fair housing issues in the jurisdiction and region in accordance with the Affirmatively Furthering Fair Housing rule.

The AFH has been prepared using the HUD provided Assessment Tool and meets the requirements to:

- Analyze data and other information and engage the community in fair housing planning;
- Identify fair housing issues in the jurisdiction and region;
- Identify and prioritize significant contributing factors for each fair housing issue identified;
- Set fair housing goals for overcoming the effects of the prioritized contributing factors, and related fair housing issues;

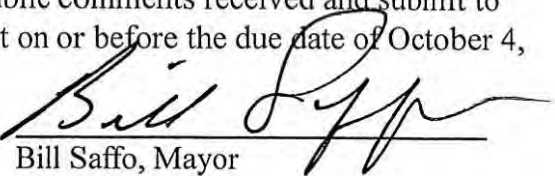
Upon acceptance by HUD the City will integrate the goals and priorities established in the AFH into subsequent plans for the use of HUD Funds (Consolidated Plans and Annual Action Plans) consistent with the statutory requirements and goals governing such programs.

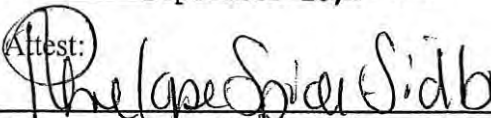
The AFH will be submitted to HUD at the conclusion of the required 30-day comment period. All public comments will be included in the final draft of the AFH and submitted to HUD.

THEREFORE, BE IT RESOLVED:

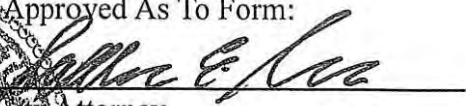
THAT, the City Council authorizes the City Manager, or his designee, to complete the City of Wilmington Assessment of Fair Housing including all public comments received and submit to the U.S. Department of Housing and Urban Development on or before the due date of October 4, 2016.

Adopted at a regular meeting
on September 20, 2016


Bill Saffo, Mayor

Attest:

Penelope Spider-Sidbury, City Clerk



Approved As To Form:

City Attorney

CITY CLERK

CERTIFIED TO BE A TRUE COPY



**RESOLUTION AUTHORIZING SUBMITTAL OF ASSESSMENT OF FAIR HOUSING
TO U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

Resolution No. 1039

WHEREAS, Both the Housing Authority of the City of Wilmington, North Carolina (WHA) and the City of Wilmington (City) are recipients of federal funds and program participants of the U.S. Department of Housing and Urban Development (HUD); and both are required to prepare an Assessment of Fair Housing (AFH) under the Affirmatively Furthering Fair Housing rule; and

WHEREAS, HUD has encouraged the joint preparation of the AFH between WHA and the City and a Collaboration Agreement has been entered into for the preparation and submittal of this Assessment with the City being the lead entity; and

WHEREAS, The AFH has been prepared using the HUD provided Assessment Tool and meets the requirements to:

- Analyze data and other information and engage the community in fair housing planning;
- Identify fair housing issues in the jurisdiction and region;
- Identify and prioritize significant contributing factors for each fair housing issue identified;
- Set fair housing goals for overcoming the effects of the prioritized contributing factors and related fair housing issues; and

WHEREAS, In addition to the Assessment Tool, meetings have been held with community residents and organizations, including two meetings with WHA's Resident Advisory Board; and

WHEREAS, The information gathered during the analysis was transferred onto a standardized AFH form for submittal to HUD and the draft AFH was posted on the City's website on September 2, 2016 and is currently in the public comment phase; and

WHEREAS, Upon conclusion of the public comment period, any comments received will be incorporated into the AFH for submittal to HUD for review and acceptance; and

WHEREAS, The submittal deadline for the AFH to HUD is October 4, 2016; and

NOW, THEREFORE, BE IT RESOLVED, THAT THE Board of Commissioners hereby authorizes the Chief Executive Officer of the Housing Authority of the City of Wilmington, North Carolina to agree to the submission of the jointly prepared Assessment of Fair Housing to the U.S. Department of Housing and Urban Development (HUD) by the City of Wilmington as the lead agency for HUD's approval.



BE IT FURTHER RESOLVED that this Resolution becomes effective on September 26, 2016.

A handwritten signature in blue ink that reads "Katrina H. Redmon". The signature is written over a horizontal line.

Katrina Redmon
Chief Executive Officer

(SEAL)

