CITY OF FAYETTEVILLE, NC

433 Hay Street, Fayetteville, NC 28301

CUMBERLAND COUNTY, NC

707 Executive Place, Fayetteville, NC 28305

FAYETTEVILLE METROPOLITAN HOUSING AUTHORITY

1000 Ramsey Street, Fayetteville, NC 28301

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

DRAFT

For Submission to HUD for the Community Development Block Grant Program

April 20, 2020

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Fayetteville, NC

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Executive Summary

The City of Fayetteville and Cumberland County, North Carolina are entitlement communities under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and the HOME Investment Partnership (HOME) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," each community must conduct an Analysis of Impediments to Fair Housing Choice which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.

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The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised Federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. As part of its Annual Action Plan, each entitlement City and County must additionally sign certifications every year stating that the City or County will affirmatively further fair housing. This means that the City and County will conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

The City of Fayetteville and Cumberland County previously prepared an Analysis of Impediments to Fair Housing Choice in 2015. The City of Fayetteville and Cumberland County have prepared this 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) in cooperation with the Fayetteville Metropolitan Housing Authority. The findings produced through this analysis will be further addressed in each of the City's and County's FY 2020-2024 Five Year Consolidated Plans.

This analysis focuses on the status and interaction of six (6) fundamental conditions within the City of Fayetteville and Cumberland County:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse to sell or rent property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their *race*, *color*, *religion*, *sex*, *national origin*, *disability*, or *familial status* in the sale, rental, and financing of housing.

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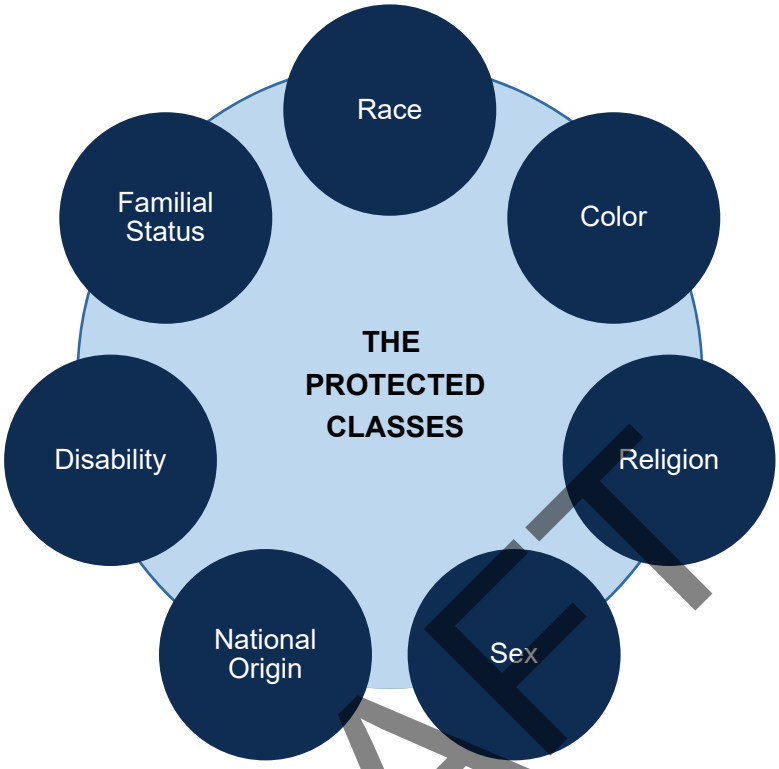

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As population shifts and economic trends grow, Fair Housing issues vary drastically between jurisdictions and regions. Therefore, the City of Fayetteville and Cumberland County are taking a more efficient and proactive approach toward affirmatively furthering fair housing choice for residents on both a local level and a regional level.

The collaboration between the City of Fayetteville and Cumberland County, North Carolina, and the Fayetteville Metropolitan Housing Authority has produced beneficial insight into the issues affecting the housing market of the City of Fayetteville and Cumberland County. While certain fair housing issues are regional in scale, this AI strives to identify strategies and goals it can take to address the barriers that are impacting Fair Housing Choice for the City's and County's residents.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
  - A review was performed of the City of Fayetteville's and Cumberland County's zoning ordinances.
  - A review of the Fayetteville Metropolitan Housing Authority's Deconcentration Analysis and Narrative.

- The most recent demographic data for the City and County was analyzed from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken.
- A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database was completed.
- A review of the real estate and mortgage practices was undertaken.
- Home mortgage foreclosure data was also reviewed.

- **In-Person Meetings/Interviews**
  - Meetings were conducted with the following:
    - Cumberland County Community Development
    - Fayetteville Metropolitan Housing Authority
    - Fayetteville City Manager
    - City of Fayetteville Planning & Zoning
    - City of Fayetteville Parks & Recreation
    - City of Fayetteville Code Enforcement
    - Cumberland County Manager
    - Cumberland County Department of Social Services
    - Cumberland County Public Health Department
    - Coordinating Council on Older Adults
    - Center for Economic Empowerment & Development (CEED)
    - City of Fayetteville Planning & Development Services
    - NCWorks Career Center
    - Cumberland County Schools
    - Kingdom Community Development Corporation
    - United Management II
    - North Carolina Legal Aid
    - Fayetteville Area Habitat for Humanity
    - Pathways 4 Prosperity
    - Fayetteville Area Operation Inasmuch
    - Fayetteville VA Medical Center
    - Alliance Health
    - Salvation Army Fayetteville
    - Cumberland Healthnet
    - Family Promise
    - Veterans Empowering Veterans

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  - Designing Station
  - Seth's Wish
  - Volunteers of America – Carolinas
  - Genesis Grace Ministry
  - Hope Center – True Vine Ministries
  - United Way of Cumberland County
  - Hope 4 NC
  - Stedman-Wade Health Services, Inc.
  - Endeavors
  - Cumberland County Fire Marshal
  - Fayetteville Urban Ministry
  - Covenant Love Church
  - Rivers of Life Christian Church
  - NAACP
  - First Baptist Church – Moore Street
  - Greater Life Church Fayetteville
  - Manna Church
  - Hay Street United Methodist Church

- **Phone Interviews**
  - Phone interviews were conducted with the following:
    - Indian Housing Authority
  - Surveys were sent to each housing, social service, and community development agency that was invited to the roundtable discussions. Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

- **Analysis of Data**
  - Low- and moderate-income areas were identified and mapped.
  - Concentrations of minority populations were identified and mapped.
  - Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
  - Fair housing awareness in the community was evaluated.
  - The locations of Housing Cost Burdens throughout the County were analyzed.
  - The locations of CDBG and HOME expenditures throughout the area were analyzed.
  - The City's and County's Five Year Goals and Objectives were reviewed.

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- **Potential Impediments**
  - Public sector policies that may be viewed as impediments were analyzed.
  - Private sector policies that may be viewed as impediments were analyzed.
  - The status of previously identified impediments was analyzed.

- **Citizen Participation**
  - The City of Fayetteville and Cumberland County published an online survey, and advertised for the survey using a press release on February 10, 2020. The online survey produced 170 responses in English and 2 responses in Spanish. See copy of survey form in the Appendix Section.
  - The City of Fayetteville and Cumberland County held two (2) Public Meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The First Public Meeting was held on Tuesday, October 15, 2019 at the Cliffdale Recreation Center and the Second Public Meeting was held on Thursday, October 17, 2019 at the Spring Lake Family Resource Center.
  - Notices for the public meetings were published in the "The Fayetteville Observer," the local newspaper of general circulation in the area.
  - The City of Fayetteville and Cumberland County met with representatives from forty-three (43) local housing, community development, realtors, and social service organizations through a series of small group discussions. These were held with the following types of organizations:
    - Local housing authority
    - Advocacy organizations
    - Direct housing stakeholders
    - Social service providers
    - Economic Development Organizations
    - Educational agencies
    - Planning organizations
    - Faith-Based Organizations
    - Local fair housing advocacy organizations
  - The City of Fayetteville and Cumberland County conducted a phone interview with the Indian Housing Authority of North Carolina, who was unable to attend the public hearings or individual group meetings.
  - The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of Fayetteville's and Cumberland County's websites at https://fayettevillenc.gov/community/community-development, http://www.co.cumberland.nc.us/departments/community-development-

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group/community_development, and a hardcopy was placed at the following locations beginning on March 5, 2020:

- Economic & Community Development Office
  Festival Park
  225 Ray Avenue
  Fayetteville, NC 28301
- Fayetteville City Hall Foyer
  433 Hay Street
  Fayetteville, NC 28301
- Cumberland County Library Headquarters
  300 Maiden Lane
  Fayetteville, NC 28301
- Cliffdale Library
  6885 Cliffdale Lane
  Fayetteville, NC 28314
- Cliffdale Recreation Center
  6404 Cliffdale Road
  Fayetteville, NC 28314
- College Lakes Recreation Center
  4963 Rosehill Road
  Fayetteville, NC 28311
- Gilmore Recreation Center
  1600 Purdue Drive
  Fayetteville, NC 28303
- J.S. Spivey Recreation Center
  500 Fisher Road
  Fayetteville, NC 28301
- Kiwanis Recreation Center
  353 Devers Street
  Fayetteville, NC 28303
- Spring Lake Town Hall
  300 Ruth Street
  Spring Lake, NC
- Godwin Town Hall
  4924 Markham Street
  Godwin, NC
- Falcon Town Hall
  7156 South West Street
  Falcon, NC
- Stedman Town Hall
  5110 Front Street
  Stedman, NC
- Wade Town Hall
  7128 Main Street
  Wade, NC
- Linden Town Hall
  9456 Academy Street
  Linden, NC
- Hope Mills Town Hall
  5770 Rockfish Road
  Hope Mills, NC
- Eastover Town Hall
  3863 Dunn Road
  Eastover, NC
- Myers Recreation Center
  1018 Rochester Drive
  Fayetteville, NC 28305

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- Massey Hill Recreation Center
  1612 Camden Road
  Fayetteville, NC 28306
- Smith Recreation Center
  1520 Slater Avenue
  Fayetteville, NC 28301
- Old Wilmington Road
  Neighborhood Resource Center
  229 Lincoln Drive
  Fayetteville, NC 28301
- College Lakes Recreation Center
  4963 Rosehill Road
  Fayetteville, NC 28311
- Westover Recreation Center
  277 Bonanza Drive
  Fayetteville, NC 28303

- The City of Fayetteville and Cumberland County held two Public Meetings on the "draft" 2020-2024 Analysis of Impediments on Thursday, March 5, 2020 and Thursday, March 19, 2020.

Based on the data analysis and citizen participation process, the following issues impacting fair housing choice in the area were identified:

- **Housing Opportunities:**
  - There is a shortage of affordable housing in Fayetteville and Cumberland County which is decent, safe, and sanitary.
  - There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.
  - There is a shortage of affordable housing units in areas of opportunity where low-income persons and households may choose to move.
  - There are a number of mobile home parks in the City and County that vary in condition, with those in the poorest conditions becoming abandoned and should be removed.
  - There is enough vacant land for infill housing, but there is a lack of financial incentives to develop affordable housing on the vacant land by public, private, and non-profit developers.
- **Housing Choice:**
  - Housing units that are deteriorated and below code standards tend to be available at affordable rents.
  - Affordable housing units are concentrated in neighborhoods that are segregated by race or ethnicity, in addition to income.
  - The special needs population in the City of Fayetteville and Cumberland County, has increased in the last 15 years, but landlords are frequently unwilling to make reasonable modifications and accommodations to their units.

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  - There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in the City of Fayetteville and Cumberland County.
  - There is a lack of "mixed-income" housing being built in the County.
  - There is a high demand for elderly housing in the County.

- **Cost Overburden:**
  - Lower household incomes create cost overburdened housing conditions; approximately 25.6% of homeowners and 47.8% of renters in the County are cost overburdened by 30% or more.
  - Wages in the City of Fayetteville have remained stagnant, contributing to the high number of cost overburdened renters and homeowners in the area.
  - The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.
  - Contingencies do not exist on investor-rehabilitated affordable housing, and investors do not want to maintain affordability.

- **Disability/Accessibility:**
  - There is a lack of housing in the County that is accessible and affordable for the elderly, the disabled, and persons with special needs.
  - The denial by some landlords to make reasonable modifications and accommodations, limits the amount of accessible units in the County that are for rent for persons with special needs.

- **Fair Housing:**
  - Tenants and homebuyers do not always file housing discrimination complaints when renting or buying a home.
  - There may be predatory loans in the region which result in foreclosure and eviction rates are high.
  - Eviction rates are high in the City and County, and landlords are permitted to evict tenants within 72 hours.
  - Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.
  - There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.

- **Access/Mobility:**

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- The limited public transportation network in the County is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
- Landlords will frequently refuse to make reasonable modifications and accommodations, and discriminate against elderly tenants.
- Families and individuals have a right to live wherever they chose if affordable housing is available outside areas of concentration of low income or racial concentration.

Using these findings, the City of Fayetteville and Cumberland County developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

- **Impediment 1: Fair Housing Education and Outreach**

There is a continuing need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

Goal: Improve the public's and local officials' knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing throughout the City of Fayetteville and Cumberland County.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **1-A:** Continue to promote Fair Housing awareness through the media, hosting seminars, and training to provide educational opportunities for all persons to learn about their rights under the Fair Housing Act and Americans with Disabilities Act.
- **1-B:** Continue to prepare and distribute literature and informational material concerning fair housing issues, an individual's housing rights, and a landlord's responsibilities to comply with the Fair Housing Act by making reasonable accommodations.
- **1-C:** Educate residents that they have the right to live outside concentrated areas of poverty.
- **1-D:** Work with the local Board of Realtors to educate and promote fair housing.
- **1-E:** Strive for better intergovernmental cooperation between state and local partners, as well as community groups, to effectively identify and address potential barriers to affordable housing choice.

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- **1-F:** Publish forms, informational material, etc. in both English and Spanish.

- **Impediment 2: Quality of Rental Housing vs. Affordability**

The City of Fayetteville and Cumberland County have a large supply of rental housing that does not meet the minimum property standards and 35.9% of all households are cost overburdened and spend 30% or more of their monthly income on housing.

Goal: Increase the supply of decent, safe, sound and affordable rental housing through new construction and rehabilitation.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **2-A:** Provide funding and incentives for the rehabilitation of rental housing for low- and moderate-income renters.
- **2-B:** Continue to enforce local codes and ordinances, and develop a Rental Registry Program in the City of Fayetteville and Cumberland County.
- **2-C:** Promote and encourage the Public Housing Authority to offer Section 8 Housing Choice Voucher holders the option to convert to homeownership.
- **2-D:** Continue to support Low Income Housing Tax Credits to develop decent, safe, sound and affordable rental housing.
- **2-E:** Target and rehabilitate rental housing in the Murchison Road Corridor and Shaw Heights Neighborhood Revitalization Strategy Areas.

- **Impediment 3: Lack of Quality Affordable Homeowner Housing**

There is a lack of housing resources for low- and moderate-income households to purchase a home. Many houses that are available for purchase are in need of substantial rehabilitation work.

Goal: Increase the supply of various types of affordable housing for sale through new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **3-A: F**inancially support and assist low- and moderate-income households to purchase homes at affordable prices throughout Cumberland County.

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- **3-B:** Support and promote the development of affordable infill housing on vacant land.
- **3-C:** Continue to fund and support homeowner rehabilitation and emergency repair programs.
- **3-D:** Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **3-E:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas that are not low-moderate income.
- **3-F:** Target and rehabilitate homeowner-occupied housing in the Murchison Road Corridor in Fayetteville the Shaw Heights in Cumberland County.

- **Impediment 4: Continuing Need for Accessible Housing Units**

As an older built-up environment, there is a lack of accessible housing units in the City of Fayetteville and Cumberland County. 21.9% of the County's housing units (including the City of Fayetteville) were built over 60 years ago and do not have accessibility features, while 16.6% of the County's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **4-A:** Promote programs to increase the amount of accessible housing through rehabilitation of existing housing stock by homeowners and landlords.
- **4-B:** Encourage the development of new construction of accessible and visitable housing through financial or development incentives.
- **4-C:** Continue to enforce ADA and Fair Housing requirements for landlords to make "reasonable accommodations" for tenants who are disabled.
- **4-D:** Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

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- **Impediment 5: Economic Issues Affecting Housing Choice**

There is a lack of economic opportunities in the City of Fayetteville and Cumberland County which prevents low-income households from increasing their financial resources to be able to choose to live outside areas of concentrated poverty.

Goal: The local economy will continue to improve by providing new job opportunities, which will increase household income, and will promote fair housing choice.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **5-A:** Strengthen partnerships that enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- **5-B:** Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- **5-C:** Continue to support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income, and minority neighborhoods.
- **5-D:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- **5-E:** Support and enhance entrepreneurship training programs, with a particularly focus on programs that assist women, minority, and veteran-owned businesses.

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- **Impediment 6: Impacted Areas of Concentration**

There are specific high poverty, racially segregated areas throughout the City of Fayetteville and Cumberland County where the concentration of low-income minority persons exceeds 70% of the area's corresponding population.

Goal: Promote the de-concentration of minorities outside the Central and Northern sections of the City of Fayetteville and areas of the County bordering Fort Bragg in order to reduce minority concentration.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **6-A:** Support, promote, and plan for affordable housing developments outside areas of minority concentration.
- **6-B:** Market and promote housing opportunities for minorities outside areas of minority concentration.
- **6-C:** Provide assistance to minority households to locate their residences outside areas of high minority concentration.

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I. Introduction

The City of Fayetteville, NC and Cumberland County, NC are both entitlement communities under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program and HOME Investment Partnership (HOME) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," the community must conduct an Analysis of Impediments to Fair Housing Choice (AI) which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised the Federal entitlement communities to prepare a new Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

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

This Analysis of Impediments to Fair Housing Choice consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition,

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including actions involving the expenditure of funds made available under 24 CFR Part 570.

HUD-FHEO suggests that communities conducting an Analysis of Impediments should consider the policies concerning "visitability," in Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is "visitable" means that it has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor.

- "Visitable" housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening.
- Section 504 of the Rehabilitation Act (24 CFR Part 8), known simply as "Section 504," prohibits discrimination against persons with disabilities in any program receiving Federal financial assistance.
- The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments.
- The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the housing unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant the full use of the housing unit.

In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The City of Fayetteville and Cumberland County previously prepared an Analysis of Impediments to Fair Housing Choice in 2015. The City of Fayetteville and Cumberland County have prepared this 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) in conjunction with the Fayetteville Metropolitan Housing Authority. The findings produced through this analysis will be further addressed in each entitlement's FY 2020-2024 Five Year Consolidated Plan.

The document is designed to act as a planning tool, providing the City of Fayetteville and Cumberland County with the necessary framework to strategically address any identified impediments to fair housing choice over the next five (5) years and continue to make modifications based on events and activities in the community during that time period.

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In order to affirmatively further fair housing, the City of Fayetteville and Cumberland County must look beyond the boundaries of the City and the County and coordinate fair housing with Hoke County, as well as the Greater Cape Fear Region. The City of Fayetteville and Cumberland County must also coordinate fair housing efforts with the US Military due to the presence of Fort Bragg. Fair housing choice is the central goal of the AI, which stresses that opportunities should be available to low-income residents and members of the protected classes who may want to live in or around the City of Fayetteville and Cumberland County.

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II. Background Data

Description – Fayetteville City

Fayetteville is the county seat of, Cumberland County, North Carolina. As of the 2010 census, the city had a total of 200,564 residents and its Metropolitan Statistical Area had a population of 366,383. It is the sixth-largest city in North Carolina, and is known as the home of Fort Bragg, the largest U.S. Army base in the Country. Due to the presence of Fort Bragg, Fayetteville has attracted residents of all walks of life, and has a reputation for multiculturalism.

Much of the industry in the area is based on the presence of Fort Bragg, including a large service industry that caters to enlistees at the base, and defense contractors working with the military. Fayetteville is also an attractive location for retired military personnel, and there is a large number of services targeted toward veterans in the area. The area is also home to Fayetteville State University, a Historically Black College and University, and Methodist University.

The population of Fayetteville has grown since the turn of the century, both through natural growth and through annexation. Fayetteville's population according to 2017 ACS estimates is 210,324.

Description – Cumberland County

Cumberland County is located in the State of North Carolina. As of the 2010 Census the population was 319,431, making it the fifth-most populous county in North Carolina. It was formed from Bladen County in 1754, which split into multiple neighboring counties in subsequent centuries. Fort Bragg lies completely within Cumberland County.

Cumberland County is part of the Cumberland County-Hoke County, NC, Metropolitan Statistical Area.

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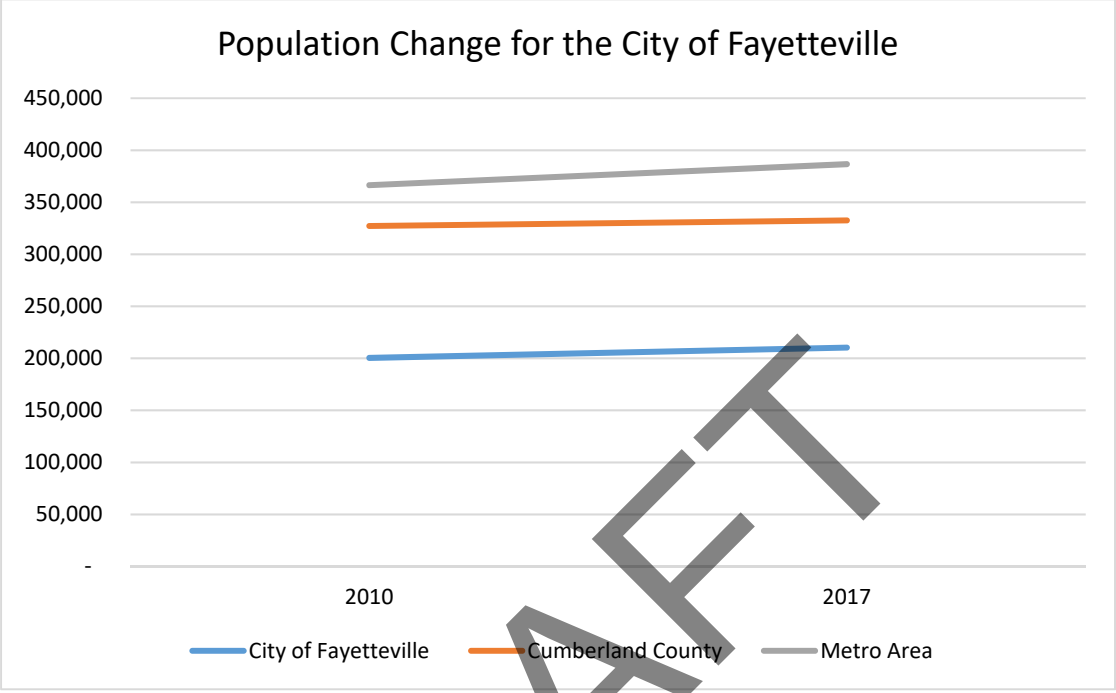
A. Population, Race, Ethnicity, and Religion

Population – Fayetteville City

Fayetteville City's population increased from 200,439 people in 2010 to 210,324 people in 2017 (an increase of 4.9 percent).

Population across the entire Fayetteville Metropolitan Area increased from 2010 to 2017.



Source: 2010 U.S. Census and 2013-2017 ACS

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Population – Cumberland County

Cumberland County's population increased from 327,214 in 2010 to 332,546 people in 2017 (an increase of 0.16 percent).

Over the same period, Fayetteville City's increased from 200,439 people in 2010 to 210,324 people in 2017 (an increase of 4.9 percent) Cumberland County's population increased from 327,214 in 2010 to 332,546 people in 2017 (an increase of 0.16 percent). The City of Fayetteville is 63.2% of the population of Cumberland County. The Metro Area at large saw a population increase from 366,383 people in 2010 to 386,662 people in 2017 (an increase of 5.5 percent).

Approximately half of the population growth of the Fayetteville Metropolitan Area can be attributed to the City of Fayetteville itself.

Race – Fayetteville City

The following table highlights the racial composition of Fayetteville City at the time of the 2012 and 2017 American Community Surveys.

Race and Hispanic or Latino Population in Fayetteville City

Race and Hispanic or Latino	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	**200,439**	-	**210,324**	-
One race	188,537	94.1%	198,065	94.2%
White alone	92,726	46.3%	96,641	45.9%
Black or African American alone	82,277	41.1%	87,364	41.5%
American Indian and Alaska Native alone	1,397	0.7%	1,889	0.9%
Asian alone	5,857	2.9%	6,051	2.9%
Native Hawaiian and Other Pacific Islander alone	803	0.4%	682	0.3%
Some other race alone	5,477	2.7%	5,438	2.6%
Hispanic or Latino	19,920	9.9%	25,187	12.0%

Source: 2010 U.S. Census and 2013-2017 ACS

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The most common race identified in Fayetteville City in 2010 was White alone with 92,726 residents comprising of 46.3 percent of the population. The second most common race identified in Fayetteville City in 2010 was Black or African American alone with 82,277 residents comprising of 41.1 percent of the population.

The most common race identified in Fayetteville City in 2017 was White alone with 96,641 residents comprising 46.0 percent of the population. The second most common race identified in Fayetteville City in 2017 was Black

or African American alone with 87,364 residents comprising of 41.5 percent of the population.

There was not any change in proportional representation in Fayetteville City from 2012 to 2017 that was larger than 5.0 percentage points.

Race – Cumberland County

The following table highlights the racial composition of Cumberland County at the time of the 2012 and 2017 American Community Surveys.

Race and Hispanic or Latino Population in Cumberland County

Race and Hispanic or Latino	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	**319,329**	**-**	**332,766**	**-**
One race	300,967	94.8%	314,926	94.4%
White alone	165,619	51.9%	169,835	51.0%
Black or African American alone	114,520	35.9%	121,699	36.6%
American Indian and Alaska Native alone	3,282	1.0%	4,649	1.4%
Asian alone	7,323	2.3%	8,299	2.5%
Native Hawaiian and Other Pacific Islander alone	1,007	0.3%	882	0.3%
Some other race alone	9,216	2.9%	8,026	2.4%
Hispanic or Latino	30,374	9.5%	37,331	11.2%

Source: 2008-2012 and 2013-2017 ACS

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The most common race identified in Cumberland County in 2012 was White alone with 114,520 residents comprising of 51.9 percent of the population. The second most common race identified in Cumberland County in 2012

was Black or African American alone with 114,520 residents comprising of 35.9 percent of the population.

The most common race identified in Cumberland County in 2017 was White alone with 169,835 residents comprising 51.0 percent of the population. The second most common race identified in Cumberland County in 2017 was Black or African American alone with 121,699 residents comprising 36.6 percent of the population.

There was not any change in proportional representation in Cumberland County from 2012 to 2017 that was larger than 5.0 percentage points.

Ethnicity – Fayetteville City

The following table highlights the ethnicities of Fayetteville City residents at the time of the 2012 and 2017 American Community Surveys.

Ethnicity and Ancestry in Fayetteville City

ANCESTRY	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total population	**200,439**	**-**	**210,324**	**-**
American	8,948	4.5%	10,003	4.8%
Arab	502	0.3%	852	0.4%
Czech	413	0.2%	251	0.1%
Danish	317	0.2%	341	0.2%
Dutch	1,844	0.9%	1,300	0.6%
English	11,384	5.7%	13,821	6.6%
French (except Basque)	2,935	1.5%	3,579	1.7%
French Canadian	919	0.5%	619	0.3%
German	21,717	10.8%	19,292	9.2%
Greek	607	0.3%	798	0.4%
Hungarian	425	0.2%	500	0.2%
Irish	15,960	8.0%	15,696	7.5%

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Italian	6,005	3.0%	6,649	3.2%
Lithuanian	143	0.1%	133	0.1%
Norwegian	1,098	0.5%	1,296	0.6%
Polish	2,599	1.3%	3,046	1.4%
Portuguese	311	0.2%	619	0.3%
Russian	651	0.2%	809	0.4%
Scotch-Irish	3,889	1.9%	3,754	1.8%
Scottish	4,251	2.1%	3,681	1.8%
Slovak	131	0.1%	57	0.0%
Sub-Saharan African	2,389	1.2%	2,393	1.1%
Swedish	1,278	0.6%	613	0.3%
Swiss	126	0.1%	226	0.1%
Ukrainian	148	0.1%	99	0.0%
Welsh	815	0.4%	777	0.4%
West Indian (excluding Hispanic origin groups)	1,931	1.0%	2,006	1.0%
Other Groups	97,075	70.8%	98,708	70.4%

Source: 2008-2012 and 2013-2017 ACS

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The most common ancestral group identified in Fayetteville City in 2010 was German with 21,717 residents comprising of 10.8 percent of the population. The second most common ancestral group identified in Fayetteville City in 2010 was Irish with 15,690 residents comprising 8.0 percent of the population.

The most common ancestral group identified in Fayetteville City in 2017 was still German with 19,292 residents comprising 9.2 percent of the population. The second most common ancestral group identified in Fayetteville City in 2017 was Irish with 15,696 residents comprising 7.5 percent of the population.

It is important to note that Other Groups make up the largest ancestral group throughout the City. These Other Groups include people with multiple ancestries, including African American and Hispanic populations. There was

not any change in proportional representation in Fayetteville City from 2010 to 2017 that was larger than 5.0 percentage points.

Ethnicity – Cumberland County

The following table highlights the ethnicities of Cumberland County residents at the time of the 2012 and 2017 American Community Surveys.

Ethnicity and Ancestry in Cumberland County

ANCESTRY	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total population	**319,329**	**-**	**332,766**	**-**
American	18,957	5.9%	20,187	6.1%
Arab	1,055	0.3%	1,372	0.4%
Czech	482	0.2%	463	0.1%
Danish	516	0.2%	497	0.1%
Dutch	3,466	1.1%	2,252	0.7%
English	20,194	6.3%	24,338	7.3%
French (except Basque)	5,289	1.7%	5,597	1.7%
French Canadian	1,393	0.4%	1,126	0.3%
German	33,646	10.5%	30,434	9.1%
Greek	937	0.3%	1,353	0.4%
Hungarian	731	0.2%	715	0.2%
Irish	27,536	8.6%	24,896	7.5%
Italian	10,363	3.2%	10,512	3.2%
Lithuanian	240	0.1%	154	0.0%
Norwegian	1,675	0.5%	1,908	0.6%
Polish	4,062	1.3%	4,711	1.4%
Portuguese	479	0.2%	846	0.3%
Russian	804	0.3%	1,144	0.3%

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Scotch-Irish	7,477	2.3%	6,359	1.9%
Scottish	7,791	2.4%	6,479	1.9%
Slovak	272	0.1%	107	0.0%
Sub-Saharan African	2,910	0.9%	3,803	1.1%
Swedish	1,868	0.6%	985	0.3%
Swiss	285	0.1%	247	0.1%
Ukrainian	257	0.1%	124	0.0%
Welsh	1,342	0.4%	1,153	0.3%
West Indian (excluding Hispanic origin groups)	2,862	0.9%	3,294	1.0%
Other Groups	141,547	66.6%	143,396	65.7%

Source: 2008-2012 ACS and 2013-2017 ACS

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The most common ancestral group identified in Cumberland County in 2010 was German with 33,646 residents comprising 10.5 percent of the population. The second most common ancestral group identified in Cumberland County in 2010 was Irish with 27,536 residents comprising 8.6 percent of the population.

The most common ancestral group identified in Cumberland County in 2017 was still German with 30,434 residents comprising 9.1 percent of the population. The second most common ancestral group identified in Cumberland County in 2017 was still the Irish with 24,896 residents comprising of 7.5 percent of the population.

It is important to note that Other Groups make up the largest ancestral group throughout the County. These Other Groups include people with multiple ancestries, including African American and Hispanic populations. There was not any change in proportional representation in Cumberland County from 2012 to 2017 that was larger than 5.0 percentage points.

Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. The **Dissimilarity Index (DI)** is based on the data from the 2010 U.S. Census and ACS data which measures whether one particular group is evenly distributed across census tracts in the

metropolitan area in the same way as another group. More specifically, the index represents the extent to which the distribution of any two (2) groups (racial, ethnic, etc.) differs across census tracts. While there are limitations due to outside factors and scale size, the Dissimilarity Index can provide an effective method of analyzing segregation and identifying trends in a community.

A high value indicates that the two groups tend to live in different tracts. 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. However, context is important in interpreting the dissimilarity index. The index measures the degree to which two groups are segregated in a particular geographic area; however, the index alone does not provide the location of the segregation within the geographic area.

Brown University has provided metro-area dissimilarity indices for 1990 to 2010. Governing Magazine has provided the dissimilarity index based on the 2013-2017 ACS Five Year Estimates. Data was not available at the City or County levels, only the Metropolitan Statistical Area (MSA).

Dissimilarity Index in the Fayetteville, NC MSA

Racial/Ethnic Dissimilarity Index	Fayetteville, NC MSA			
	1990	2000	2010	2017
Black / White	31.8	31.1	30.7	32.1
Hispanic / White	31.6	28.8	25.4	21.8
Asian or Pacific Islander/White	32.7	29.9	26.4	37.7

Source: 2000 U.S. Census & 2013-2017 ACS Estimates

The Dissimilarity Index (DI) trends among social/ethnicities in the Fayetteville, NC MSA have diverged based on the race or ethnicity. According to the dissimilarity indices, the Fayetteville area is one of the least black-white segregated regions in the United States. The Fayetteville area had been growing less segregated from 1990 to 2010 in terms of White residents and African American/Black residents. However, the region has become more segregated between White and African American/Black

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residents since 2010. Meanwhile, the dissimilarity index between White and Hispanic residents in the MSA increased from 1990 to 2000, and has decreased steadily since 2010. The dissimilarity index showing the segregation between White and Asian residents has increased significantly from 2010 to 2017.

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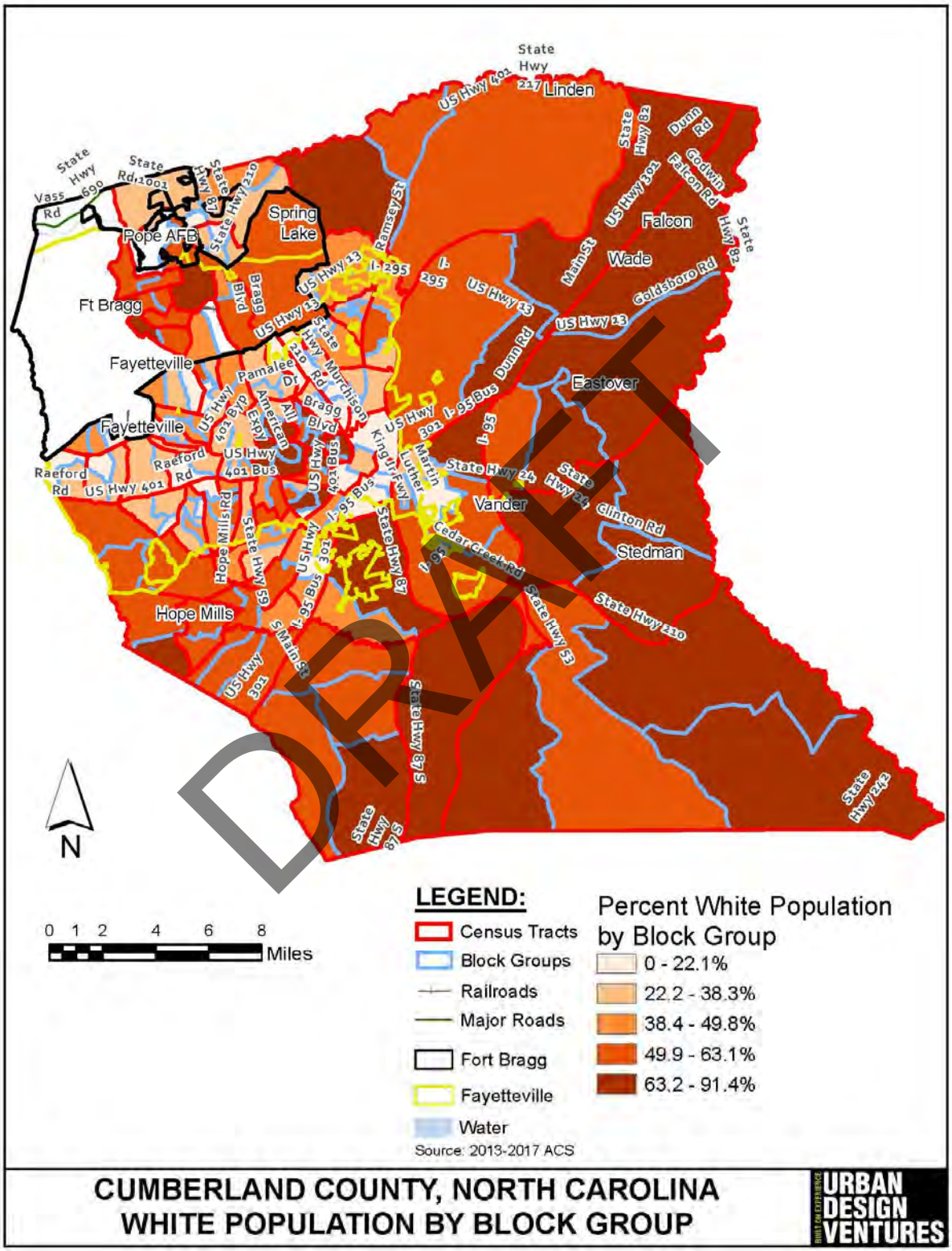
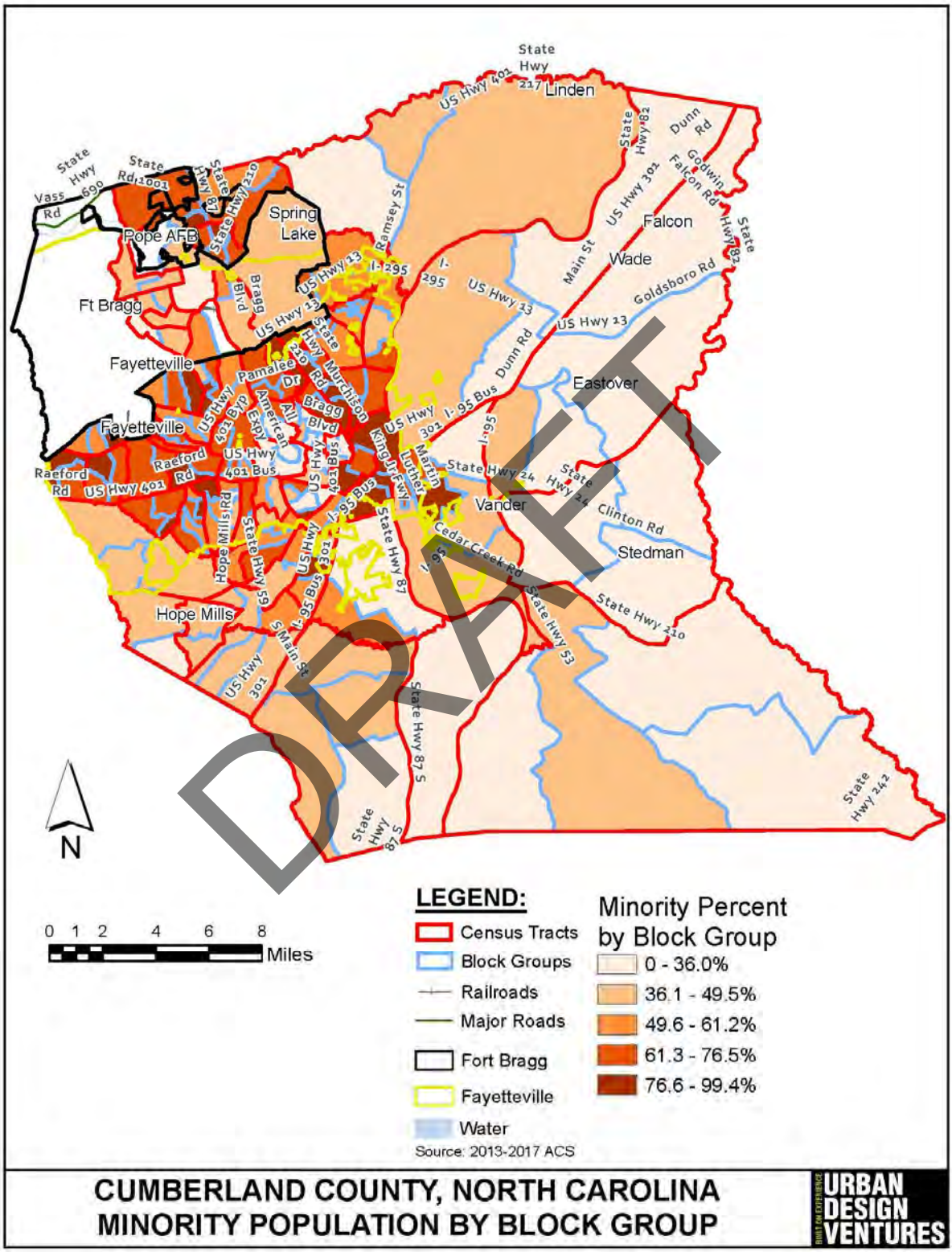


CUMBERLAND COUNTY, NORTH CAROLINA
WHITE POPULATION BY BLOCK GROUP

URBAN DESIGN VENTURES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Goldsboro Rd
US Hwy 13
Eastover
Dunn Rd
I-295
I-95 Bus
I-295
US Hwy 301
State Hwy 24
Vander
Clinton Rd
Stedman
Cedar Creek Rd
State Hwy 210
State Hwy 53
State Hwy 87
State Hwy 87 S
State Hwy 242
Ramsey St
State Hwy 690
Vass Rd
State Rd 1001
State Hwy 59
State Hwy 210
Spring Lake
Pope AFB
Ft Bragg
Bragg Blvd
US Hwy 13
I-295
Fayetteville
Pamalee Dr
State Hwy 210
Murchison Rd
Bragg Blvd
US Hwy 401 Byp
American Expy
All American Expy
Fayetteville
Raeford Rd
US Hwy 401
US Hwy 401 Bus
Martin Luther King Jr Fwy
Hope Mills Rd
State Hwy 59
Hope Mills
US Hwy 301
S Main St
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N
0 1 2 4 6 8
Miles
LEGEND:
Census Tracts
Block Groups
Railroads
Major Roads
Fort Bragg
Fayetteville
Water
Source: 2013-2017 ACS
Minority Percent by Block Group
0 - 36.0%
36.1 - 49.5%
49.6 - 61.2%
61.3 - 76.5%
76.6 - 99.4%
CUMBERLAND COUNTY, NORTH CAROLINA
MINORITY POPULATION BY BLOCK GROUP
URBAN DESIGN VENTURES

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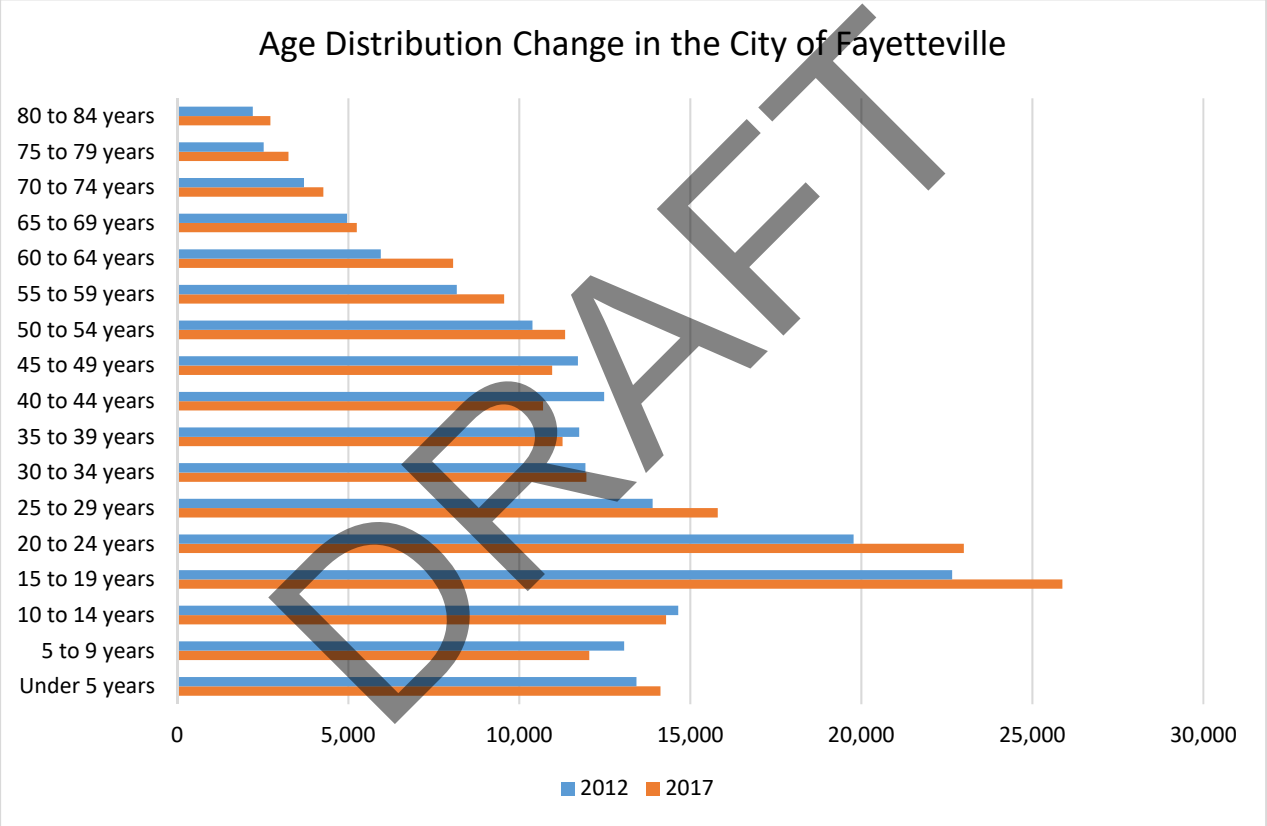
Age – Fayetteville City

The following chart illustrates age distribution in Fayetteville City at the time of the 2008-2012 ACS and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 26.8 percent of the population; 41.8 percent of the population is between 20 and 45 years of age; 20.2 percent of the population is 45 to 65; and 11.2 percent of the population is 65 years of age and older. The median age is 30.0 years of age.



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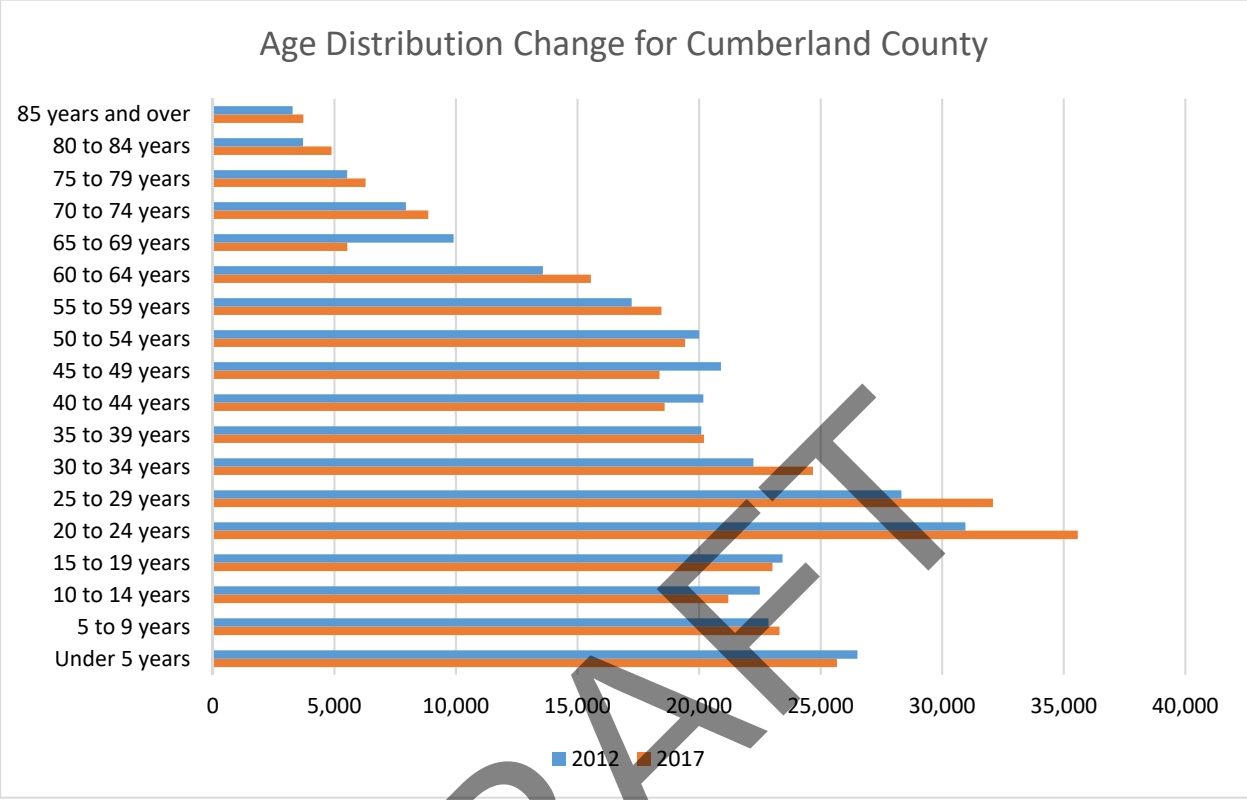
Source: 2008-2012 ACS and 2013-2017 ACS

Age – Cumberland County

The following chart illustrates age distribution in Cumberland County at the time of the 2008-2012 ACS and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 28.0 percent of the population; 39.4 percent of the population is between 20 and 45 years of age; 21.6 percent of the population is 45 to 65; and 11.0 percent of the population is 65 years of age and older. The median age is 31.0 years of age.



Source: 2008-2012 ACS and 2013-2017 ACS

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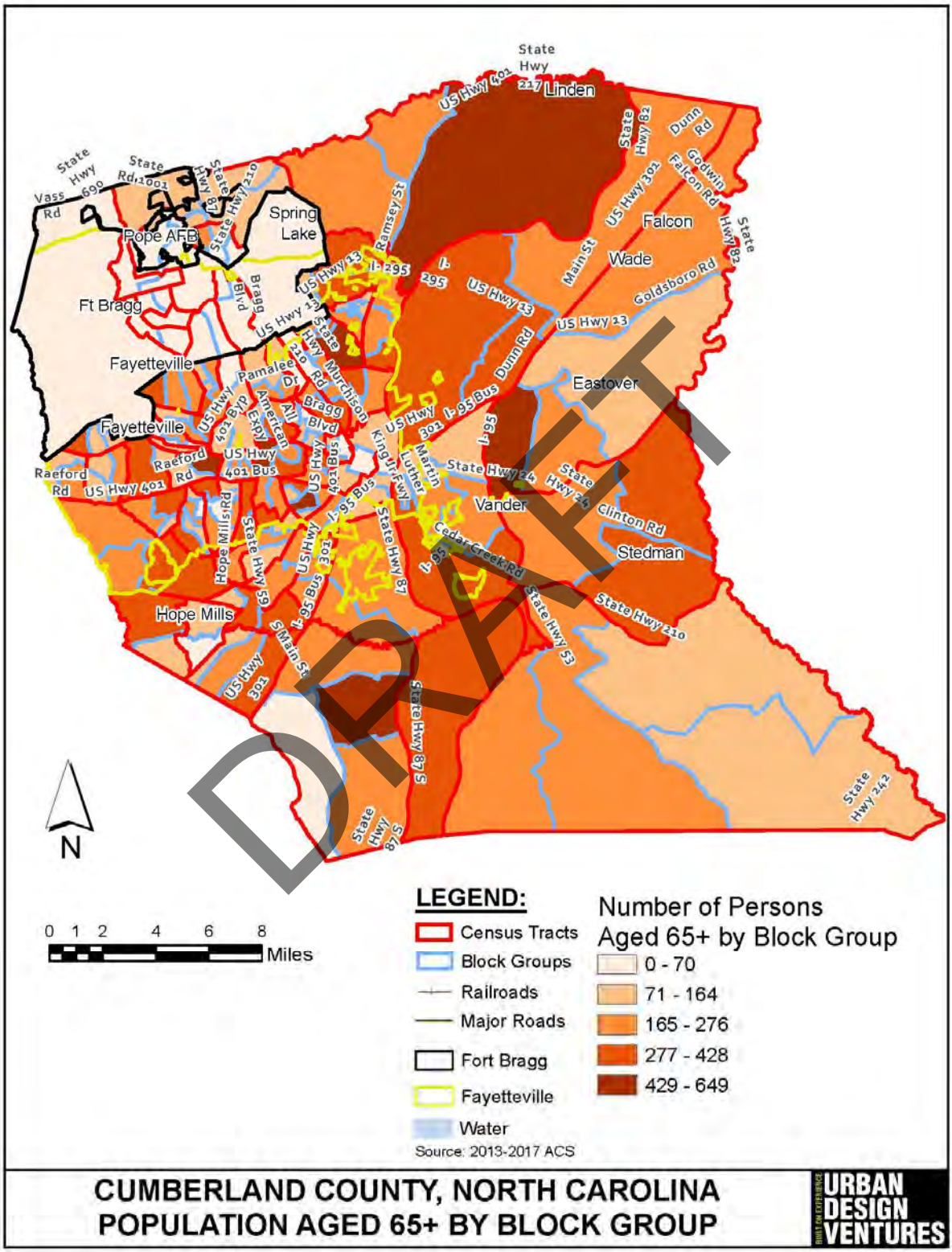
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State Hwy 210
Spring Lake
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US Hwy 13
Main St
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Goldsboro Rd
Ft Bragg
Bragg Blvd
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Murchison Rd
Pamalee Dr
All American Expy
Bragg Blvd
Dunn Rd
Eastover
I-95 Bus
I-95
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Raeford Rd
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0 1 2 4 6 8
Miles
LEGEND:
Census Tracts
Block Groups
Railroads
Major Roads
Fort Bragg
Fayetteville
Water
Source: 2013-2017 ACS
Number of Persons Aged 65+ by Block Group
0 - 70
71 - 164
165 - 276
277 - 428
429 - 649
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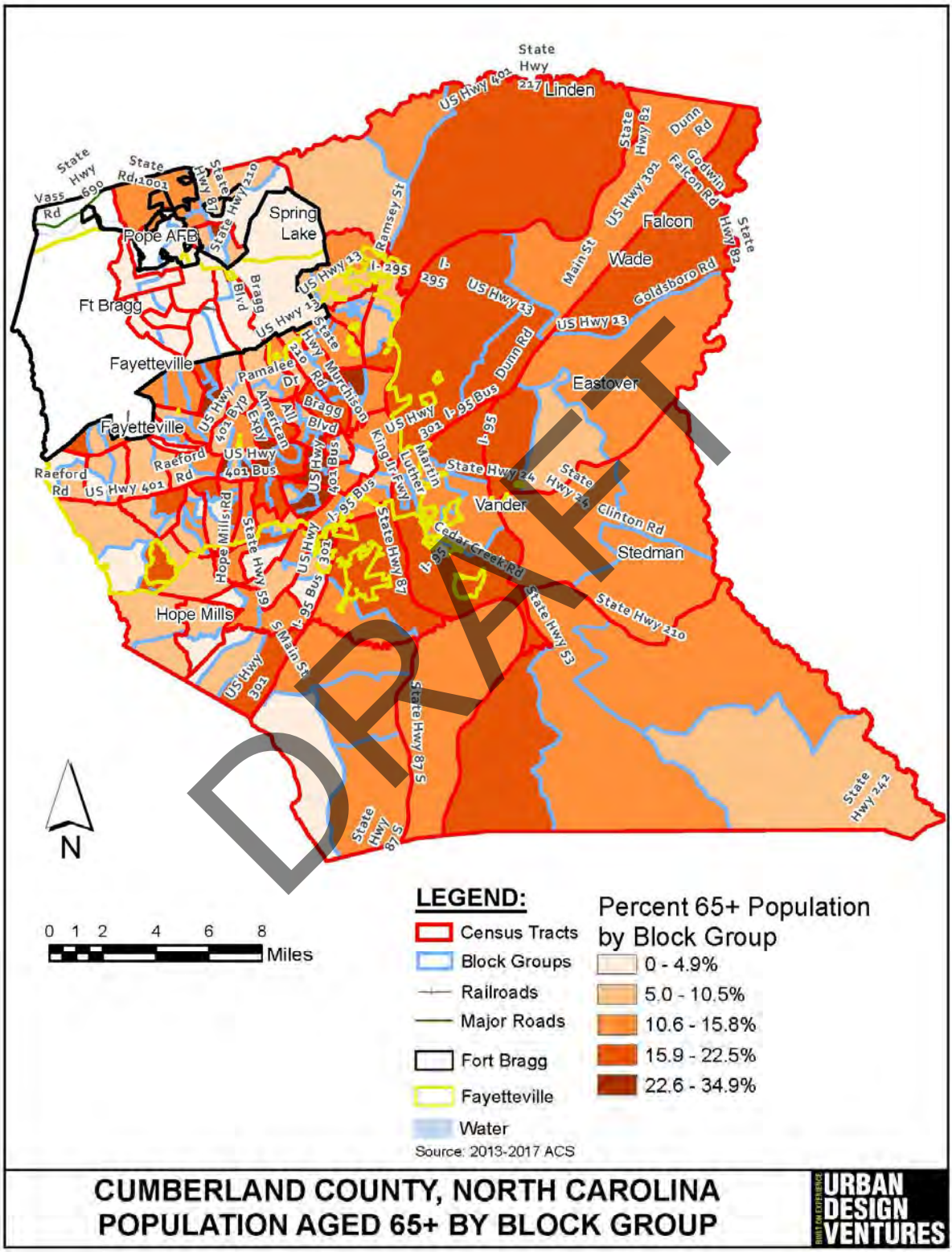
CUMBERLAND COUNTY, NORTH CAROLINA
POPULATION AGED 65+ BY BLOCK GROUP
URBAN DESIGN VENTURES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Miles
LEGEND:
Census Tracts
Block Groups
Railroads
Major Roads
Fort Bragg
Fayetteville
Water
Source: 2013-2017 ACS
Percent 65+ Population by Block Group
0 - 4.9%
5.0 - 10.5%
10.6 - 15.8%
15.9 - 22.5%
22.6 - 34.9%
CUMBERLAND COUNTY, NORTH CAROLINA
POPULATION AGED 65+ BY BLOCK GROUP
URBAN DESIGN VENTURES

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Religion – Cumberland County

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Cumberland County, the County used the data made available by The Association of Religion Data Archives (ARDA). ARDA surveyed the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations in the year 2000. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of Cumberland County across various denominational groups, as a percentage of the population which reported an affiliation with a church.

Religious Affiliation in Cumberland County

	1990		2000		2010	
	#	%	#	%	#	%
Total Population:	**274,566**	**-**	**302,963**	**-**	**319,431**	**-**
Evangelical Protestant	74,605	21.8%	61,797	20.4%	91,229	28.6%
Black Protestant	13,872	5.1%	0	0.0%	14,701	4.6%
Mainline Protestant	26,254	9.6%	31,029	10.2%	26,956	8.4%
Catholic	6,266	2.3%	9,182	3.0%	8,962	2.8%
Orthodox	0	0.0%	521	0.2%	440	0.1%
Other	1,967	0.7%	2,915	1.0%	6,165	1.9%
Total Adherents:	122,965	44.8%	105,444	34.8%	148,417	46.5%

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Unclaimed:	151,601	55.2%	197,519	65.2%	171,014	53.4%

Source: The Association of Religion Data

The most common religious affiliation identified for Cumberland County in 1990 was Evangelical Protestant with 74,605 adherents comprising 27.2 percent of the population. The second most common religious affiliation identified in Cumberland County in 1990 was Mainline Protestant with 26,254 adherents comprising 9.6 percent of the population.

The most common religious affiliation identified in Cumberland County in 2010 was Evangelical Protestant with 91,229 adherents comprising 28.6 percent of the population. The second most common religious affiliation identified in Cumberland County in 2010 was Mainline Protestant with 26,956 adherents comprising 8.4 percent of the population.

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B. Households

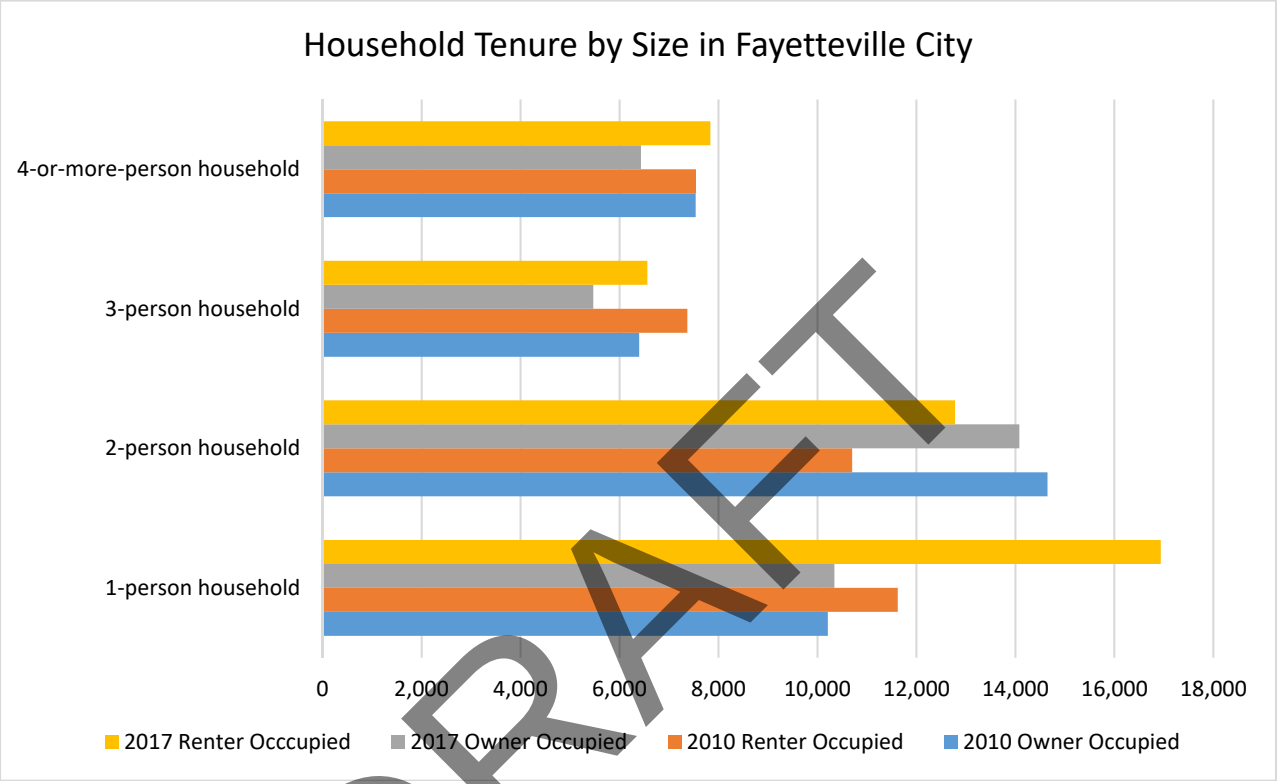
Household Tenure – Fayetteville City

According to the 2008-2012 American Community Survey, there were 86,929 housing units in Fayetteville City. Of these housing units, 76,041 (87.4 percent) were occupied and 10,888 (12.6 percent) were vacant. Of the occupied housing units, 38,800 (51.0 percent) were owner-occupied and 37,241 (49.0 percent) were renter-occupied.

According to the 2017 ACS 5-Year estimates, there were 94,652 housing units in Fayetteville City. Of these housing units, 80,451 (85.0 percent) were occupied and 14,201 (15.0 percent) were vacant. Of the occupied housing units, 36,329 (45.2 percent) were owner-occupied and 44,122 (54.8 percent) were renter-occupied.

From 2012 to 2017 there was a 4,410 unit increase in the total number of housing units, a 1,097 unit increase (1.7 percentage point increase) in the number of occupied units, and a 3,313 unit increase (30.4 percentage point increase) in the number of vacant units. The number of owner-occupied units decreased by 2,471 units (6.4 percentage point decrease) and the number of renter-occupied units increased by 6,881 units (18.5 percentage point increase).

There was a large increase in the number of 1-person renter occupied households in Fayetteville City from 2012 to 2017.



Source: 2012-2017 ACS and 2013-2017 ACS

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Household Tenure – Cumberland County

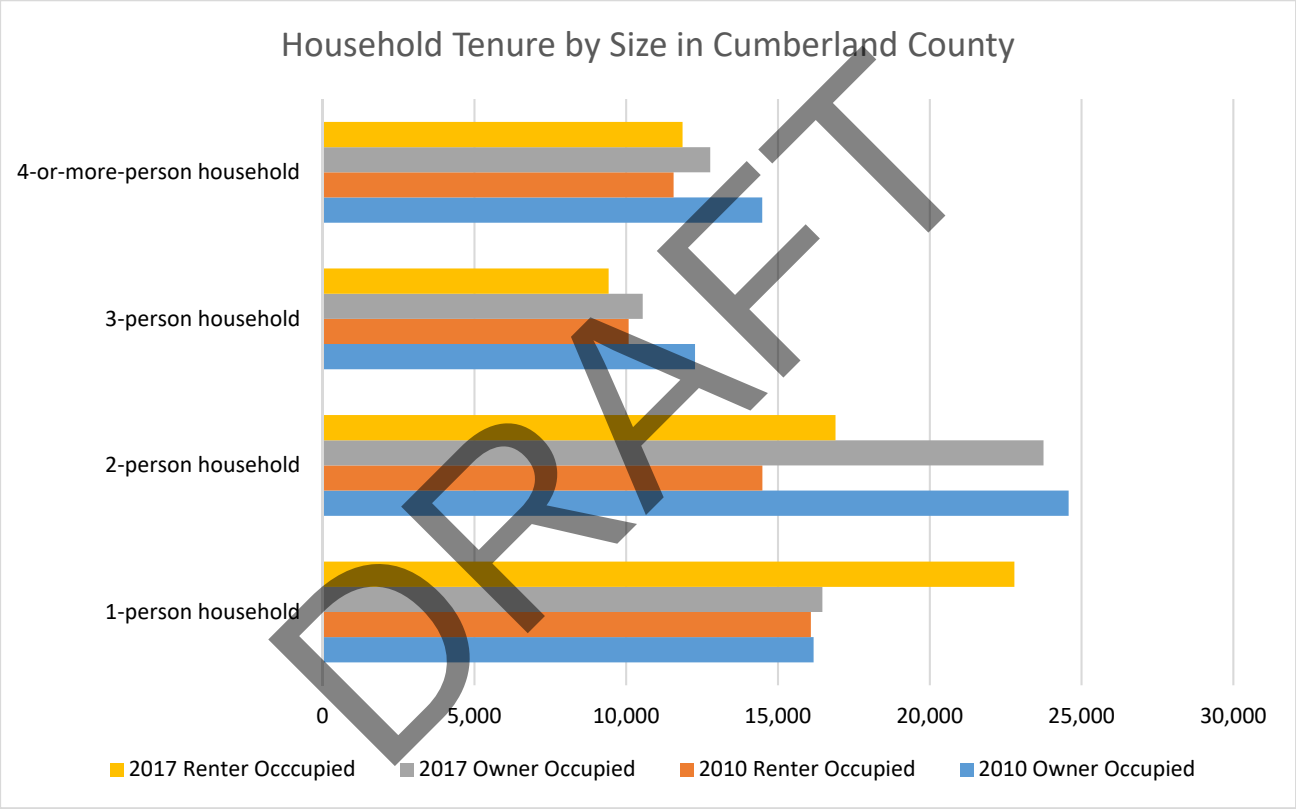
According to the 2008-2012 ACS, there were 119,723 housing units in Cumberland County. Of these housing units, 102,745 (15.8 percent) were occupied and 16,978 (14.2 percent) were vacant. Of the occupied housing units, 67,499 (56.4 percent) were owner-occupied and 52,224 (43.6 percent) were renter-occupied.

According to the 2017 ACS 5-Year estimates, there were 124,500 housing units in Cumberland County. Of these housing units, 103,910 (83.5 percent) were occupied and 20,590 (16.5 percent) were vacant. Of the occupied housing units, 63,533 (51.0 percent) were owner-occupied and 60,967 (49.0 percent) were renter-occupied.

From 2012 to 2017 there was a 4,777 unit increase in the total number of housing units, a 1,165 unit increase (1.1 percentage point increase) in the

number of occupied units, and a 3,612 unit increase (21.3 percentage point increase) in the number of vacant units. The number of owner-occupied units decreased by 3,966 units (6.2 percentage point decrease) and the number of renter-occupied units increased by 8,743 (16.7 percentage point increase).

There was a large increase in the number of 1-person renter occupied households in Fayetteville City from 2012 to 2017.



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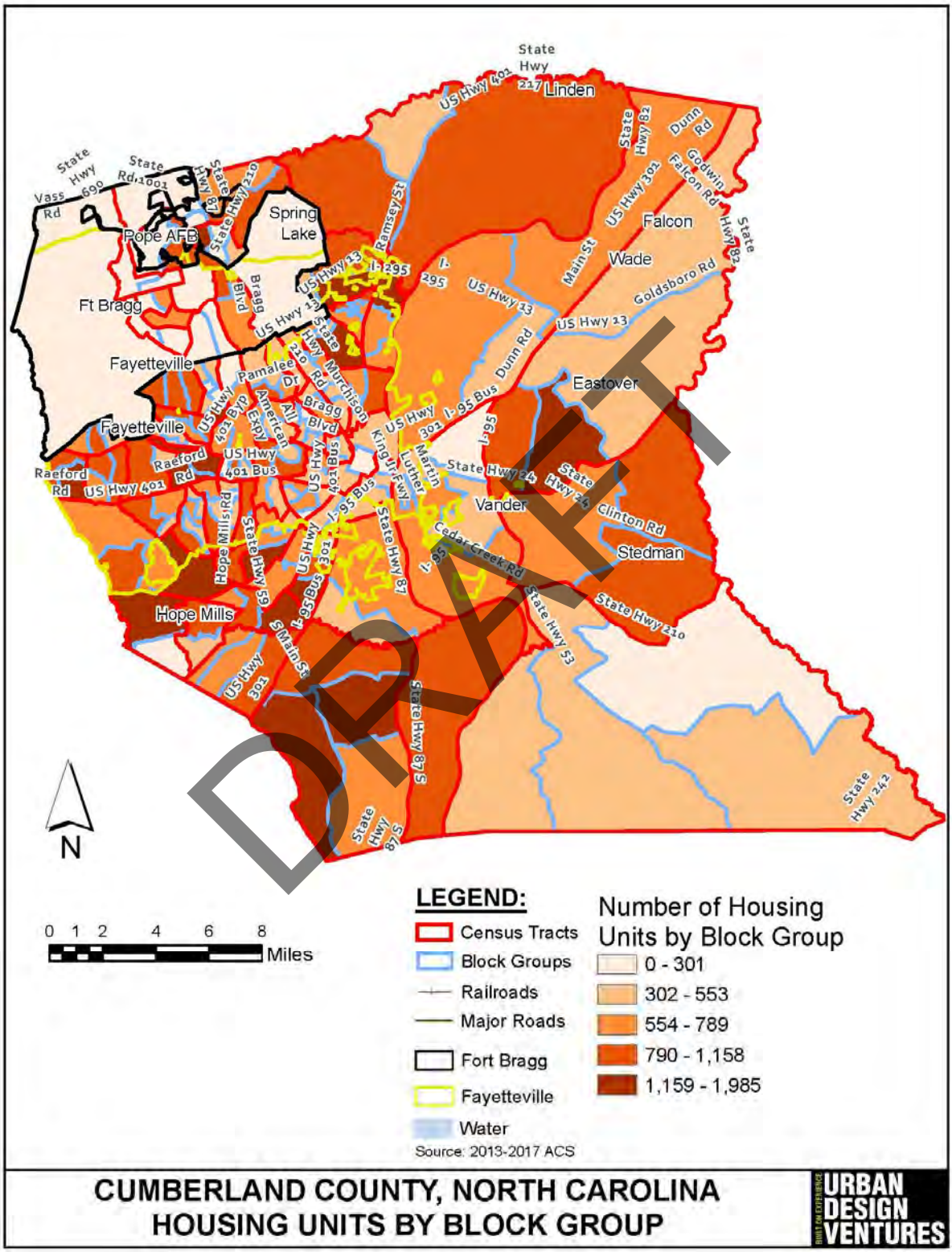
Source: 2008-2012 ACS and 2013-2017 ACS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State Rd 1001
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LEGEND:
Census Tracts
Block Groups
Railroads
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Fort Bragg
Fayetteville
Water
Number of Housing Units by Block Group
0 - 301
302 - 553
554 - 789
790 - 1,158
1,159 - 1,985
Source: 2013-2017 ACS
CUMBERLAND COUNTY, NORTH CAROLINA
HOUSING UNITS BY BLOCK GROUP
URBAN DESIGN VENTURES

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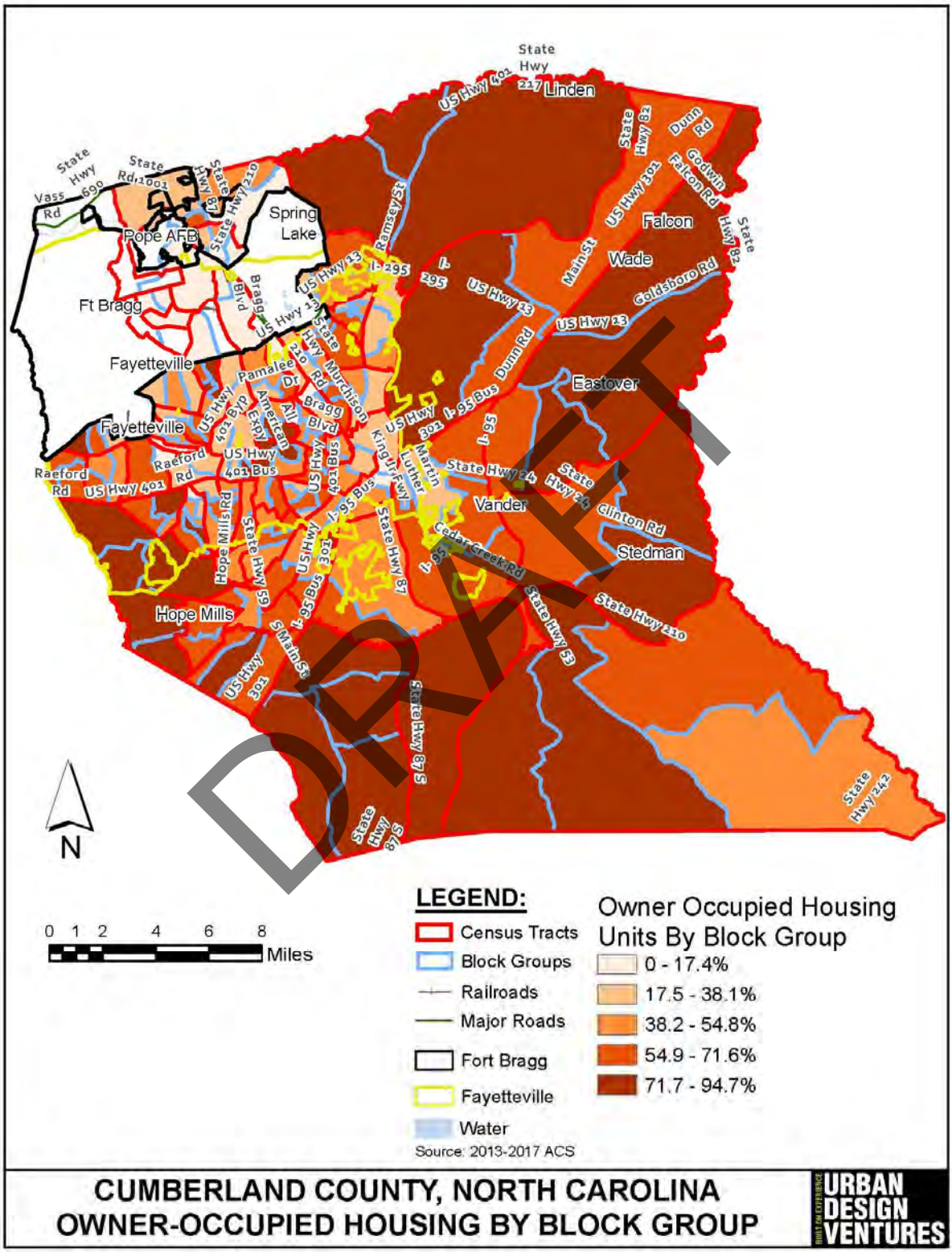
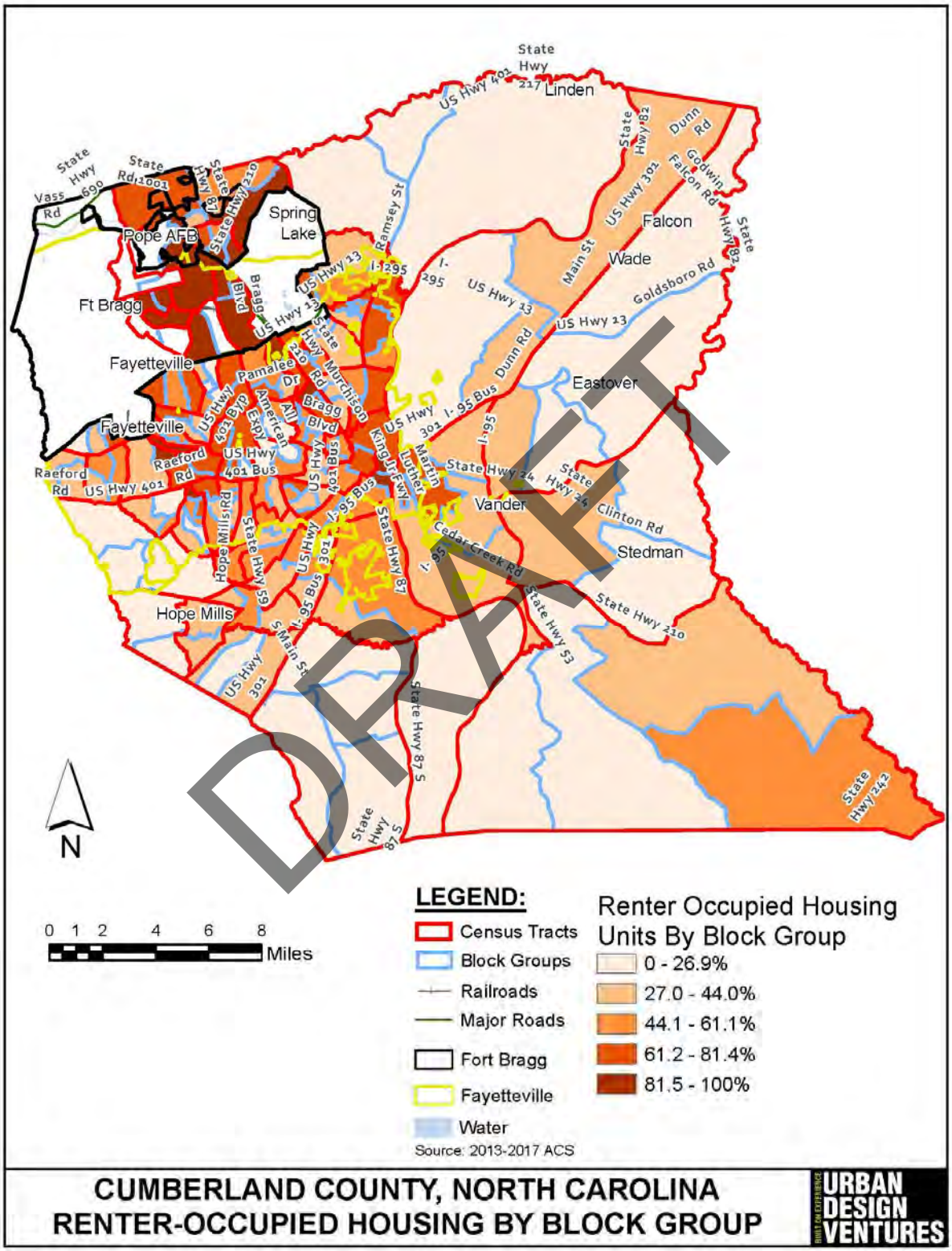


CUMBERLAND COUNTY, NORTH CAROLINA
OWNER-OCCUPIED HOUSING BY BLOCK GROUP

URBAN DESIGN VENTURES


State Hwy 217
Linden
US Hwy 401
State Hwy 82
Dunn Rd
Godwin Falcon Rd
US Hwy 301
Falcon
State Hwy 782
State Hwy 690
Vass Rd
State Rd 1001
State Hwy 87
State Hwy 210
Spring Lake
Pope AFB
Ramsey St
I-295
US Hwy 13
Main St
Wade
Goldsboro Rd
Ft Bragg
Bragg Blvd
Fayetteville
Pamalee Dr
State Hwy 210
Murchison Rd
Eastover
Dunn Rd
I-95 Bus
I-95
US Hwy 401 Byp
American Expy
All American Fwy
Bragg Blvd
US Hwy 301
Raeford Rd
US Hwy 401
US Hwy 401 Bus
Martin Luther King Jr Fwy
State Hwy 24
Vander
Clinton Rd
Stedman
Hope Mills Rd
State Hwy 59
Cedar Creek Rd
State Hwy 87
Hope Mills
S Main St
State Hwy 53
State Hwy 210
State Hwy 87 S
State Hwy 242
N
0 1 2 4 6 8
Miles
LEGEND:
Census Tracts
Block Groups
Railroads
Major Roads
Fort Bragg
Fayetteville
Water
Source: 2013-2017 ACS
Renter Occupied Housing Units By Block Group
0 - 26.9%
27.0 - 44.0%
44.1 - 61.1%
61.2 - 81.4%
81.5 - 100%
CUMBERLAND COUNTY, NORTH CAROLINA
RENTER-OCCUPIED HOUSING BY BLOCK GROUP
URBAN DESIGN VENTURES

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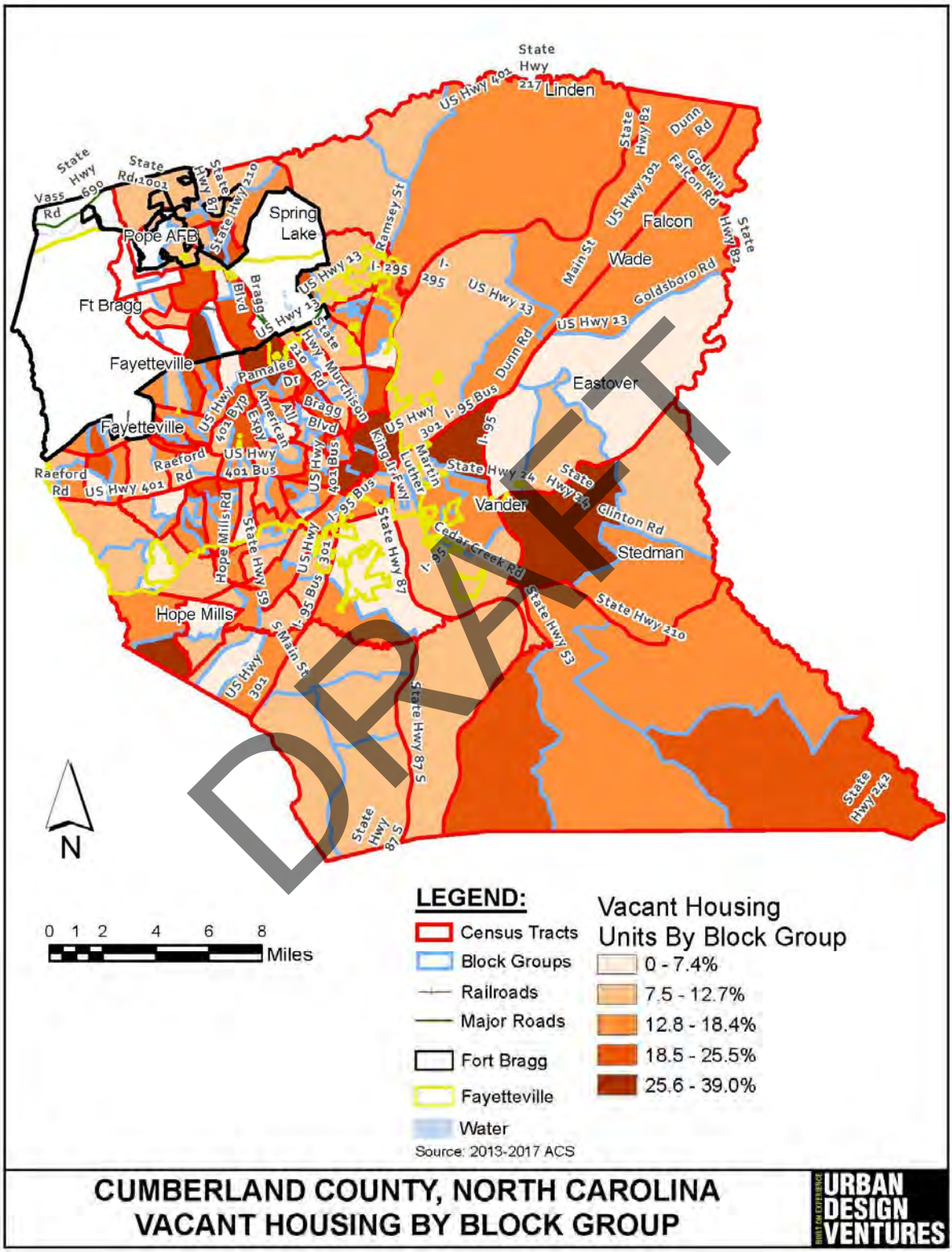

CUMBERLAND COUNTY, NORTH CAROLINA
VACANT HOUSING BY BLOCK GROUP

URBAN DESIGN VENTURES

Household Tenure by Race and Ethnicity – Fayetteville City

The tables below compares homeowners and renters by race and ethnicity in Fayetteville City.

Household Type by Race and Ethnicity in Fayetteville City

Cohort	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Householder who is White alone	37,391	48.2%	39,352	48.9%
Householder who is Black or African American alone	31,372	41.3%	34,030	42.3%
Householder who is American Indian and Alaska Native alone	542	0.7%	615	0.8%
Householder who is Asian alone	2,292	3.0%	1,998	2.5%
Householder who is Native Hawaiian and Other Pacific Islander alone	214	0.3%	182	0.2%
Householder who is some other race alone	1,732	2.3%	1,771	2.2%
Householder who is two or more races	1,057	1.4%	716	0.9%
Householder who is Hispanic or Latino	6,183	8.1%	7,946	9.9%
Householder who is not Hispanic or Latino	33,899	44.6%	34,364	42.7%

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Household Tenure by Race and Ethnicity in Fayetteville City

Cohort	2008-2012 ACS				2013-2017 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	20,805	27.4%	16,586	21.8%	19,435	24.2%	19,917	24.8%
Householder who is Black or African American alone	14,649	19.3%	16,723	22.0%	14,033	17.4%	19,997	24.9%
Householder who is American Indian and Alaska Native alone	358	0.5%	184	0.2%	244	0.3%	371	0.5%
Householder who is Asian alone	1,207	1.6%	1,085	1.4%	1,206	1.5%	792	1.0%

Householder who is Native Hawaiian and Other Pacific Islander alone	84	0.1%	130	0.2%	86	0.1%	96	0.1%
Householder who is some other race alone	640	0.8%	1,092	1.4%	609	0.8%	1,162	1.4%
Householder who is two or more races	1,057	1.4%	1,441	1.9%	716	0.9%	1,787	2.2%
Householder who is Hispanic or Latino	2,801	3.7%	3,382	4.5%	3,217	4.0%	4,729	5.9%
Householder who is not Hispanic or Latino	19,249	25.3%	14,650	19.3%	17,252	21.4%	17,112	21.3%

Source: 2008-2012 ACS and 2013-2017 ACS

Homeownership rates continue to decline in the City. Homeowners represented 51.0 percent (38,800 households) of all households in 2012 and 45.2 percent (36,329 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 49.0 percent (37,241 households) of all households in 2012 and 54.8 percent (44,122 households) of all households in 2017.

There was not a significant shift in Household Tenure from 2012 to 2017 in Fayetteville City.

Household Tenure by Race and Ethnicity – Cumberland County

The tables below compare homeowners and renters by race and ethnicity in Cumberland County.

Household Type by Race and Ethnicity in Cumberland County

Cohort	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Householder who is White alone	65,404	54.6%	67,228	82.4%
Householder who is Black or African American alone	43,613	36.4%	46,316	37.2%
Householder who is American Indian and Alaska Native alone	1,264	1.1%	1,473	1.2%

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Householder who is Asian alone	2,790	2.3%	2,584	2.1%
Householder who is Native Hawaiian and Other Pacific Islander alone	237	0.2%	300	0.2%
Householder who is some other race alone	2,824	2.4%	2,666	2.1%
Householder who is two or more races	3,591	3.0%	3,933	3.2%
Householder who is Hispanic or Latino	9,340	7.8%	11,621	9.3%
Householder who is not Hispanic or Latino	60,293	50.4%	60,149	48.3%

Household Tenure by Race and Ethnicity in Cumberland County

Cohort	2008-2012 ACS				2013-2017 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	41,037	34.3%	24,367	20.4%	38,144	30.6%	29,084	23.4%
Householder who is Black or African American alone	21,434	17.9%	22,179	18.5%	20,479	16.5%	25,837	20.8%
Householder who is American Indian and Alaska Native alone	835	0.7%	429	0.4%	811	0.7%	662	0.5%
Householder who is Asian alone	1,601	1.3%	1,189	1.0%	1,565	1.3%	1,019	0.8%
Householder who is Native Hawaiian and Other Pacific Islander alone	107	0.1%	130	0.1%	157	0.1%	143	0.1%
Householder who is some other race alone	960	0.8%	1,864	1.6%	985	0.8%	1,681	1.4%
Householder who is two or more races	1,525	1.3%	2,066	1.7%	1,392	1.1%	2,541	2.0%
Householder who is Hispanic or Latino	4,240	3.5%	5,100	4.3%	4,989	4.0%	6,632	5.3%
Householder who is not Hispanic or Latino	38,535	32.2%	21,758	18.2%	34,878	28.0%	25,271	20.3%

Source: 2008-2012 ACS and 2013-2017 ACS

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Homeownership rates continue to decline in the County. Homeowners represented 56.4 percent (67,499 households) of all households in 2012 and 51.0 percent (63,533 households) of all households in 2017. In response, rental rates increased in the County. Renters represented 43.6 percent (52,224 households) of all households in 2012 and 49.0 percent (60,967 households) of all households in 2017.

There was not a significant shift in Household Tenure from 2012 to 2017 in Cumberland County.

Families – Fayetteville City

In 2012, there were a total of 188,420 households in Fayetteville City. Non-family households comprised 16.2 percent (32,500 households) of all households. In 2017, there were a total of 196,720 households, of which 18.1 percent (38,142 households) comprised of non-family households. The total number of households in Fayetteville City increased by 8,300 units from 2012 to 2017, whereas the total number of non-family households increased by 5,642 units (17.4 percentage point increase). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 18.1 percent of all households, married-couple family households comprised 15.0 percent of all households, female householders with no husband present comprised 11.5 percent of all households, and male householders with no wife present comprised 11.8 percent of all households in the City. The chart below illustrates the breakdown of households by type in Fayetteville City as of 2017 using data from the 2013-2017 ACS.

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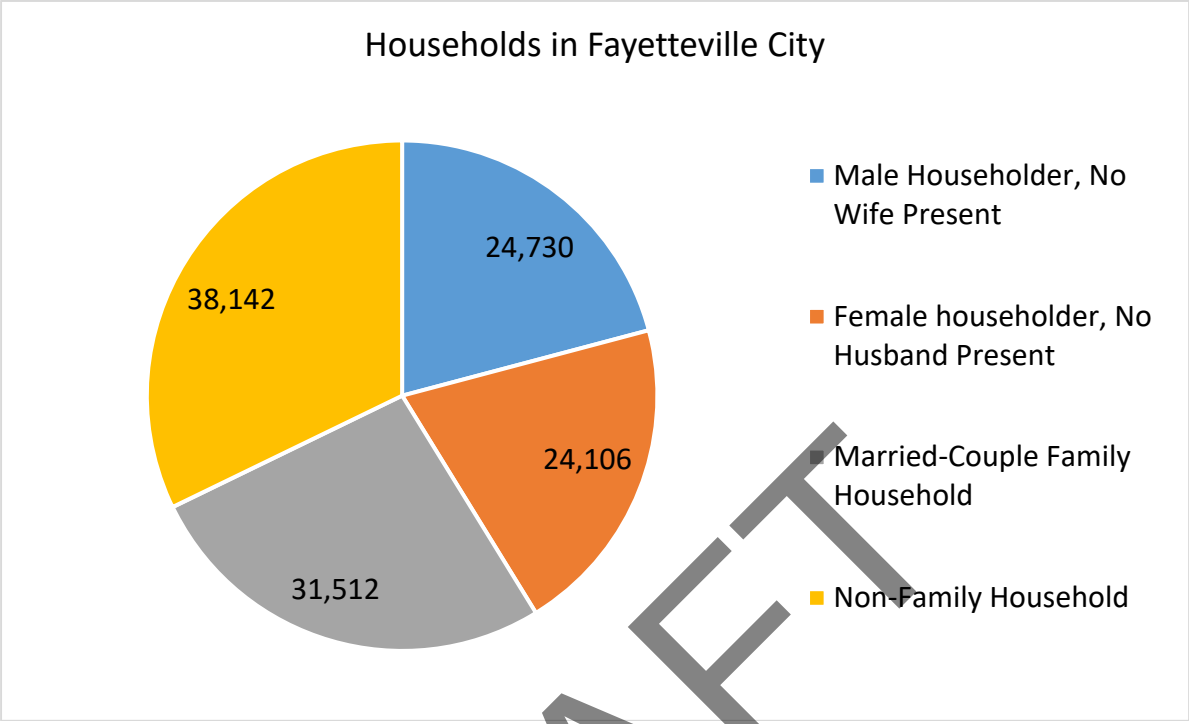

Source: 2013-2017 ACS

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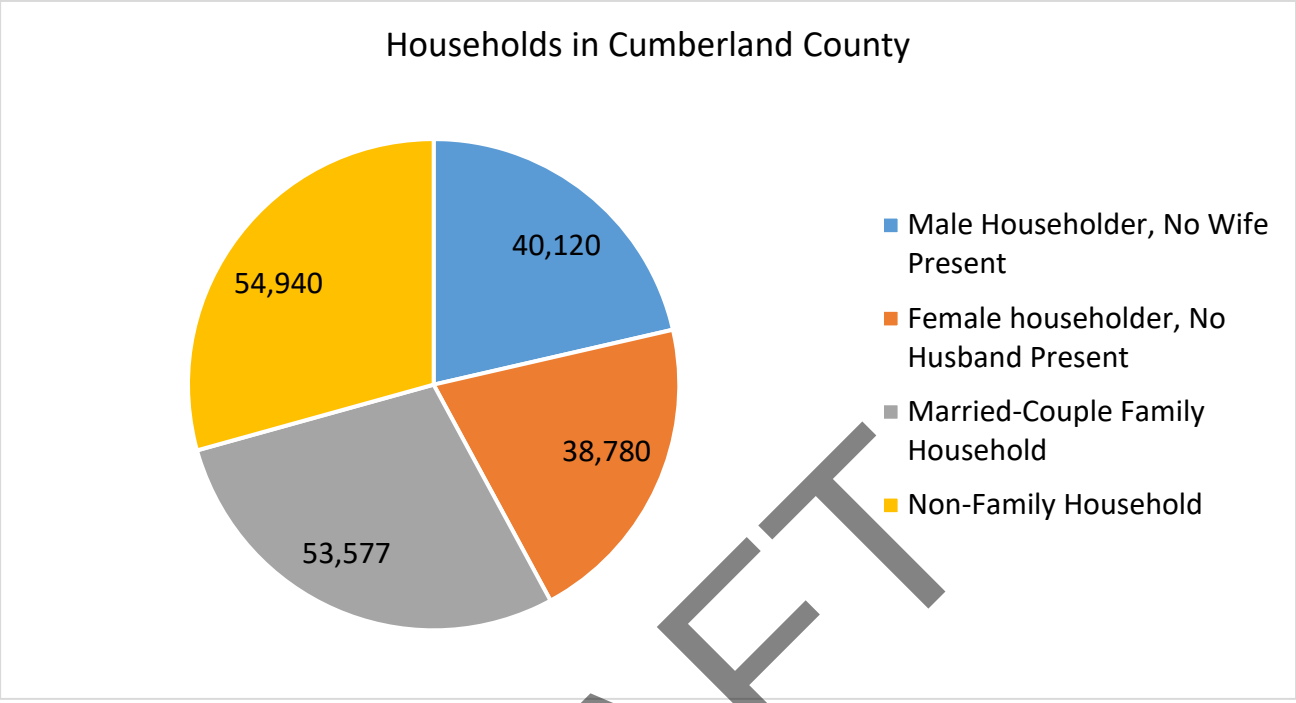
Families – Cumberland County

In 2012, there were a total of 306,461 households in Cumberland County. Non-family households comprised 14.9 percent (47,599 households) of all households. In 2017, there were a total of 317,584 households, of which 16.5 percent (54,940 households) comprised non-family households. The total number of households in Cumberland County increased by 11,123 units from 2012 to 2017, as did the total number of non-family households (7,341 unit increase), an increase of 15.4 percentage points. A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 16.5 percent of all households, married-couple family households comprised 16.1 percent of all households, female householders with no husband present comprised 11.7 percent of all households, and male householders with no wife present comprised 12.1 percent of all households in Cumberland County. The chart below illustrates the breakdown of households by type in Cumberland County as of 2017 using data from the 2013-2017 ACS.



Source: 2013-2017 ACS

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C. Income and Poverty

Household Income

The median household income in Cumberland County decreased by 1.5 percent ($676 decrease) from $45,413 in 2012 to $44,737 in 2017. The median household income in the City of Fayetteville is lower than that of the County, at $43,439. It decreased by 2.9 percent ($1,317 decrease) from $44,756 in 2012 to $43,439 in 2017.

Household Income – Fayetteville City

The table below compares the distribution of household income according to the 2008-2012 American Community Survey and the 2013-2017 American Community Survey.

Household Income in Fayetteville City

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	**76,041**	**-**	**80,451**	**-**
Less than $10,000	6,759	8.9%	6,945	8.6%
$10,000 to $14,999	3,898	5.1%	4,838	6.0%
$15,000 to $24,999	8,344	11.0%	9,828	12.2%
$25,000 to $34,999	10,118	13.3%	10,928	13.6%
$35,000 to $49,999	13,225	17.4%	13,275	16.5%
$50,000 to $74,999	15,450	20.3%	15,459	19.2%
$75,000 to $99,999	8,130	10.7%	8,409	10.5%
$100,000 to $149,999	6,689	8.8%	7,065	8.8%
$150,000 to $199,999	1,895	2.5%	2,124	2.6%
$200,000 or more	1,533	2.0%	1,580	2.0%
Median Household Income	$44,756	-	$43,439	-
Mean Household Income	$57,370	-	$57,059	-

Source: 2008-2012 and 2013-2017 ACS

Household Income – Cumberland County

The table below compares the distribution of household income according to the 2008-2012 American Community Survey and the 2013-2017 American Community Survey.

Household Income in Cumberland County

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	**119,723**	**-**	**124,500**	**-**
Less than $10,000	10,466	8.7%	10,577	8.5%
$10,000 to $14,999	6,285	5.3%	7,101	5.7%
$15,000 to $24,999	13,374	11.2%	15,330	12.3%
$25,000 to $34,999	15,503	13.0%	16,042	12.9%
$35,000 to $49,999	19,628	16.4%	20,046	16.1%
$50,000 to $74,999	23,233	19.4%	23,348	18.6%
$75,000 to $99,999	13,362	11.2%	14,056	11.3%
$100,000 to $149,999	12,281	10.3%	11,959	9.6%

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$150,000 to $199,999	3,263	2.7%	3,587	2.9%
$200,000 or more	2,328	1.9%	2,454	2.0%
Median Household Income	$45,413	-	$44,737	-
Mean Household Income	$58,495	-	$58,623	-

Source: 2008-2012 and 2013-2017 ACS

The U.S. Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 Project-Based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

The Median Income for a family of four in the Metro Area was $45,572 in 2012, and decreased to $44,883 in 2017.

The table below identifies the FY 2019 HUD Income Limits applicable to the Fayetteville Metro Area.

Fayetteville, NC Metro Area
Section 8 Income Limits for FY 2019

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	$12,490	$16,910	$21,330	$25,750	$29,850	$32,050	$34,250	$36,450
Very Low (50%) Income Limits	$19,350	$22,100	$24,850	$27,600	$29,850	$32,050	$34,250	$36,450
Low (80%) Income Limits	$30,950	$35,350	$39,750	$44,150	$47,700	$51,250	$54,750	$58,300

Source: HUD Section 8 Income Limits

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The following table highlights the current low- and moderate-income population in Cumberland County. The block groups that have a population of more than 51% low- and moderate-income are highlighted in the following table. The City of Fayetteville has an overall low- and moderate-income population of 38.77% and Cumberland County has an overall low- and moderate-income population of 35.58%. Combined, the two jurisdictions have a low- and moderate-income population of 37.54%.

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Low- and Moderate-Income Population for the Cumberland County Jurisdiction, NC

COUNTY	TRACT	BLOCK GROUP	LOWMOD	LOWMODUNIV	LOWMODPCT
Cumberland County	000200	1	555	590	94.07%
Cumberland County	000200	2	630	720	87.50%
Cumberland County	000200	3	495	755	65.56%
Cumberland County	000500	1	700	1155	60.61%
Cumberland County	000500	2	325	485	67.01%
Cumberland County	000500	3	460	585	78.63%
Cumberland County	000600	2	170	745	22.82%
Cumberland County	000600	4	595	660	90.15%
Cumberland County	000600	3	545	1775	30.70%
Cumberland County	000600	5	105	1125	9.33%
Cumberland County	000600	1	730	1050	69.52%
Cumberland County	000701	3	550	2125	25.88%
Cumberland County	000701	1	255	2265	11.26%
Cumberland County	000701	2	100	1230	8.13%
Cumberland County	000702	1	270	1085	24.88%
Cumberland County	000702	2	390	1000	39.00%
Cumberland County	000800	1	290	665	43.61%
Cumberland County	000800	3	755	1245	60.64%
Cumberland County	000800	2	305	805	37.89%
Cumberland County	000900	1	400	1055	37.91%
Cumberland County	000900	4	195	935	20.86%
Cumberland County	000900	2	565	755	74.83%
Cumberland County	000900	3	315	890	35.39%
Cumberland County	000900	5	270	915	29.51%
Cumberland County	000900	6	360	890	40.45%
Cumberland County	001000	1	570	950	60.00%
Cumberland County	001000	2	1240	1790	69.27%
Cumberland County*	001100*	1*	645*	1265*	50.99%*
Cumberland County	001100	2	610	935	65.24%
Cumberland County	001100	3	540	1315	41.06%
Cumberland County	001200	1	505	1040	48.56%
Cumberland County	001200	4	1270	2295	55.34%
Cumberland County	001200	2	515	830	62.05%
Cumberland County	001200	3	780	1145	68.12%
Cumberland County	001400	1	805	1570	51.27%

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Cumberland County	001400	2	350	900	38.89%
Cumberland County	001400	3	155	550	28.18%
Cumberland County	001400	5	735	1570	46.82%
Cumberland County	001400	4	425	1500	28.33%
Cumberland County	001500	2	620	1410	43.97%
Cumberland County	001500	1	390	1345	29.00%
Cumberland County	001601	1	710	1925	36.88%
Cumberland County	001601	2	595	2350	25.32%
Cumberland County	001601	3	1220	3460	35.26%
Cumberland County	001603	1	1095	1940	56.44%
Cumberland County	001603	2	675	2050	32.93%
Cumberland County	001604	1	395	1120	35.27%
Cumberland County	001604	2	1230	2170	56.68%
Cumberland County	001604	3	1390	3915	35.50%
Cumberland County	001700	4	1510	4310	35.03%
Cumberland County	001700	1	1295	2075	62.41%
Cumberland County	001700	3	830	1365	60.81%
Cumberland County*	001700*	2*	625*	1230*	50.81%*
Cumberland County	001800	1	530	1315	40.30%
Cumberland County	001800	2	555	1035	53.62%
Cumberland County	001901	1	1120	2215	50.56%
Cumberland County	001902	1	1145	2175	52.64%
Cumberland County	001902	2	1090	2590	42.08%
Cumberland County	001903	1	480	985	48.73%
Cumberland County	001903	2	560	1605	34.89%
Cumberland County	001903	3	340	675	50.37%
Cumberland County	001903	4	670	955	70.16%
Cumberland County	002001	1	450	1330	33.83%
Cumberland County	002001	2	545	1480	36.82%
Cumberland County	002002	3	490	1205	40.66%
Cumberland County	002002	4	405	1180	34.32%
Cumberland County	002002	1	335	560	59.82%
Cumberland County	002002	2	960	2390	40.17%
Cumberland County	002100	1	645	1130	57.08%
Cumberland County	002100	2	865	1450	59.66%
Cumberland County	002100	3	175	1330	13.16%
Cumberland County	002200	1	60	285	21.05%
Cumberland County	002200	2	560	990	56.57%
Cumberland County	002300	1	710	790	89.87%

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Cumberland County	002300	2	1315	2200	59.77%
Cumberland County	002300	3	605	1655	36.56%
Cumberland County	002401	1	545	965	56.48%
Cumberland County	002401	2	705	890	79.21%
Cumberland County	002402	1	530	865	61.27%
Cumberland County	002402	2	885	1325	66.79%
Cumberland County	002402	3	275	1150	23.91%
Cumberland County	002501	1	525	1765	29.75%
Cumberland County	002501	3	1020	4655	21.91%
Cumberland County	002501	2	610	1235	49.39%
Cumberland County	002502	1	895	3140	28.50%
Cumberland County	002502	3	905	1755	51.57%
Cumberland County	002502	2	605	1655	36.56%
Cumberland County	002503	1	580	1385	41.88%
Cumberland County	002503	3	525	1815	28.93%
Cumberland County	002503	2	520	1760	29.55%
Cumberland County	002504	2	540	2240	24.11%
Cumberland County	002504	1	940	1245	75.50%
Cumberland County	002504	3	760	2580	29.46%
Cumberland County	002600	3	155	1010	15.35%
Cumberland County	002600	2	535	1355	39.48%
Cumberland County	002600	1	645	1610	40.06%
Cumberland County	002700	4	775	2560	30.27%
Cumberland County	002700	2	330	1615	20.43%
Cumberland County	002700	3	635	3225	19.69%
Cumberland County	002700	1	290	1060	27.36%
Cumberland County	002800	3	410	2160	18.98%
Cumberland County	002800	1	1095	2675	40.93%
Cumberland County	002800	2	610	1710	35.67%
Cumberland County	002900	4	455	925	49.19%
Cumberland County	002900	3	320	760	42.11%
Cumberland County	002900	1	570	1285	44.36%
Cumberland County	002900	2	315	1405	22.42%
Cumberland County	003001	2	1290	4700	27.45%
Cumberland County	003001	4	375	2365	15.86%
Cumberland County	003001	1	485	2175	22.30%
Cumberland County	003001	3	495	3180	15.57%
Cumberland County	003002	1	985	2830	34.81%
Cumberland County	003102	2	320	945	33.86%

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Cumberland County	003102	1	545	3480	15.66%
Cumberland County	003103	2	1020	2630	38.78%
Cumberland County	003103	1	560	1445	38.75%
Cumberland County	003103	3	295	1595	18.50%
Cumberland County	003104	1	630	1930	32.64%
Cumberland County*	003104*	3*	1165*	2295*	50.76%*
Cumberland County	003104	2	565	2070	27.29%
Cumberland County	003201	1	320	1965	16.28%
Cumberland County	003201	3	425	2625	16.19%
Cumberland County	003201	4	710	4070	17.44%
Cumberland County	003201	2	365	3900	9.36%
Cumberland County	003203	1	1025	1915	53.52%
Cumberland County	003203	3	845	2285	36.98%
Cumberland County	003203	2	425	1175	36.17%
Cumberland County	003204	1	640	1130	56.64%
Cumberland County	003204	2	540	1160	46.55%
Cumberland County	003204	3	780	2075	37.59%
Cumberland County	003204	4	240	1045	22.97%
Cumberland County	003204	5	885	3115	28.41%
Cumberland County	003205	1	435	2415	18.01%
Cumberland County	003205	2	350	2265	15.45%
Cumberland County	003205	3	570	1035	55.07%
Cumberland County	003302	1	905	1745	51.86%
Cumberland County	003302	2	1250	3350	37.31%
Cumberland County	003304	1	115	735	15.65%
Cumberland County	003304	2	720	1210	59.50%
Cumberland County	003304	3	1120	2655	42.18%
Cumberland County	003304	4	520	825	63.03%
Cumberland County	003304	5	125	940	13.30%
Cumberland County	003304	6	115	485	23.71%
Cumberland County	003305	1	745	2145	34.73%
Cumberland County	003305	2	570	1605	35.51%
Cumberland County	003305	3	1055	1920	54.95%
Cumberland County	003307	1	555	1000	55.50%
Cumberland County	003307	2	830	3300	25.15%
Cumberland County	003309	2	370	1650	22.42%
Cumberland County	003309	3	480	1830	26.23%
Cumberland County	003309	1	490	2280	21.49%
Cumberland County	003310	4	795	1965	40.46%

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Cumberland County	003310	1	540	1035	52.17%
Cumberland County	003310	2	110	400	27.50%
Cumberland County	003310	3	665	1215	54.73%
Cumberland County	003311	1	920	2475	37.17%
Cumberland County	003312	3	460	2005	22.94%
Cumberland County	003312	1	535	1330	40.23%
Cumberland County	003312	2	645	1910	33.77%
Cumberland County	003312	4	550	1245	44.18%
Cumberland County	003313	2	690	2900	23.79%
Cumberland County	003313	1	1090	3330	32.73%
Cumberland County	003314	2	620	2180	28.44%
Cumberland County	003314	1	1075	2310	46.54%
Cumberland County	003314	3	730	2770	26.35%
Cumberland County	003401	1	0	0	0.00%
Cumberland County	003401	2	1715	3240	52.93%
Cumberland County	003402	1	0	0	0.00%
Cumberland County	003402	2	0	0	0.00%
Cumberland County	003403	2	1280	3065	41.76%
Cumberland County	003403	1	380	835	45.51%
Cumberland County	003404	1	0	0	0.00%
Cumberland County	003404	2	0	0	0.00%
Cumberland County	003405	1	1030	1760	58.52%
Cumberland County	003406	1	160	895	17.88%
Cumberland County	003407	1	615	1155	53.25%
Cumberland County	003407	2	0	0	0.00%
Cumberland County	003408	1	785	2730	28.75%
Cumberland County	003408	2	775	2185	35.47%
Cumberland County	003500	1	1765	3340	52.84%
Cumberland County	003500	2	415	660	62.88%
Cumberland County	003500	3	515	655	78.63%
Cumberland County	003500	4	385	1055	36.49%
Cumberland County	003600	3	1145	2195	52.16%
Cumberland County	003600	1	315	680	46.32%
Cumberland County	003600	4	765	2005	38.15%
Cumberland County	003600	2	420	750	56.00%
Cumberland County	003700	2	155	1590	9.75%
Cumberland County	003700	1	255	1895	13.46%
Cumberland County	003700	3	1785	3570	50.00%
Cumberland County	003800	1	740	1030	71.84%

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Cumberland County	003800	2	260	380	68.42%
Cumberland County	003800	3	425	860	49.42%
Cumberland County	980100	1	0	0	0.00%
Cumberland County	980200	1	0	0	0.00%
TOTAL			**117,955**	**314,195**	**37.54%**

Source: HUD Exchange

The following map illustrates areas of Cumberland County with concentrations of low- and moderate-income residents. These Census Block Groups that are above 51% low- and moderate-income. They are mostly concentrated in the City of Fayetteville, the Town of Spring Lake and, and areas of the County that border the City of Fayetteville to the south. Also of note are Block Groups above 50.76% low- and moderate-income, marked with asterisks. Cumberland County is an exception grantee, and Block Groups above 50.76% are considered low- and moderate-income for the County. Additionally, a map of low- and moderate-income block groups with an overly of all majority-minority block groups shows that every minority-majority block group in the region is also greater than 51% low- and moderate-income.

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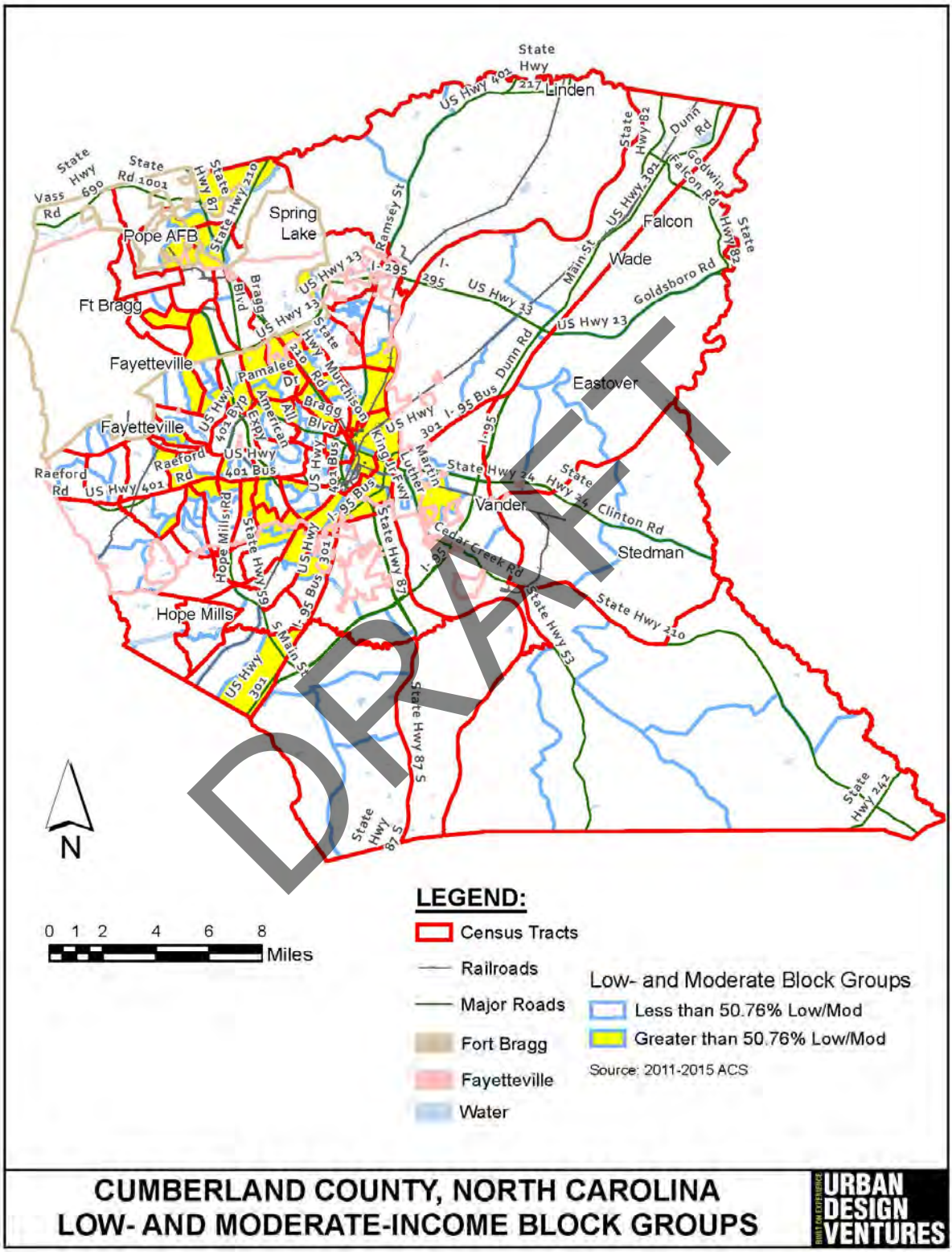
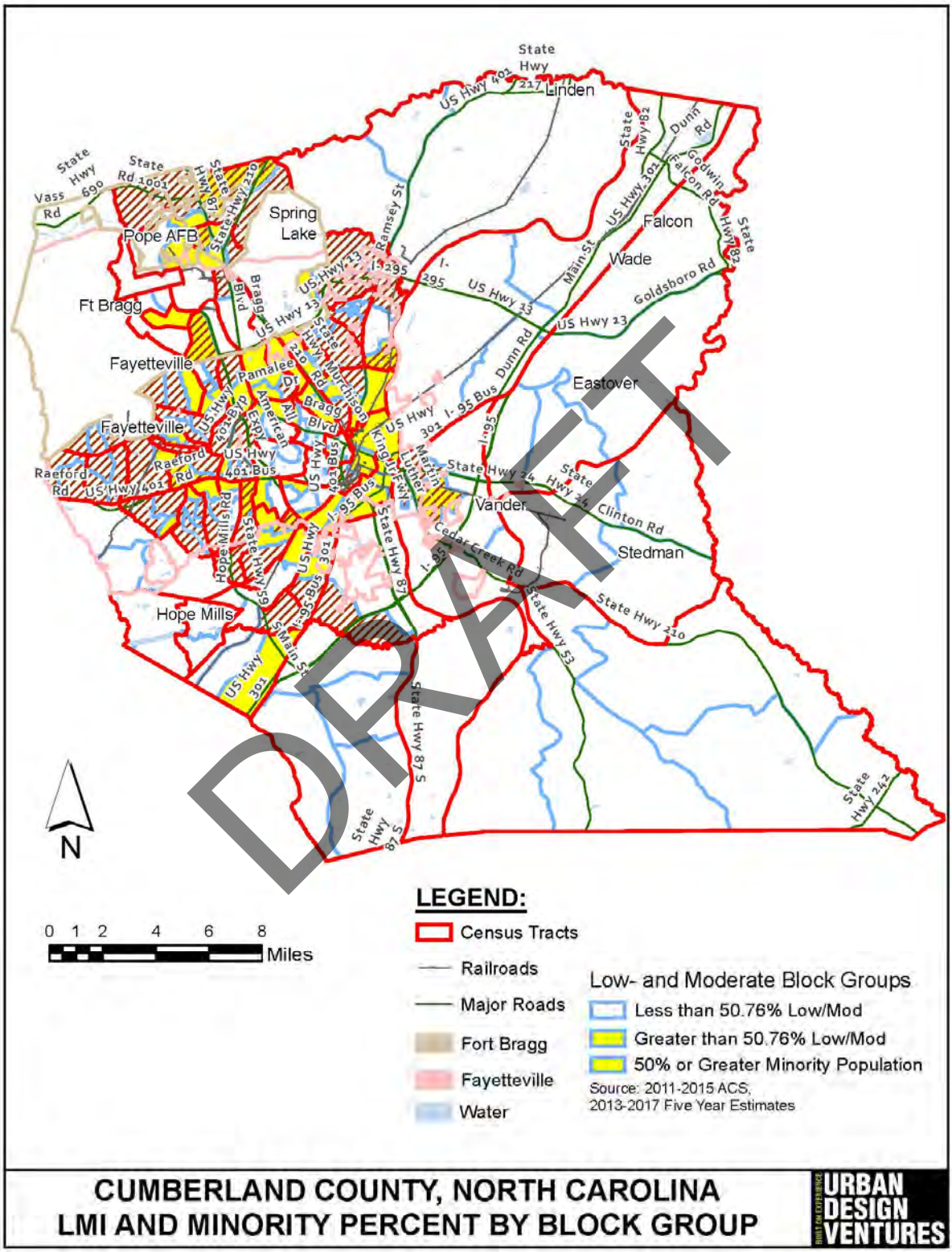


CUMBERLAND COUNTY, NORTH CAROLINA
LOW- AND MODERATE-INCOME BLOCK GROUPS

URBAN DESIGN VENTURES

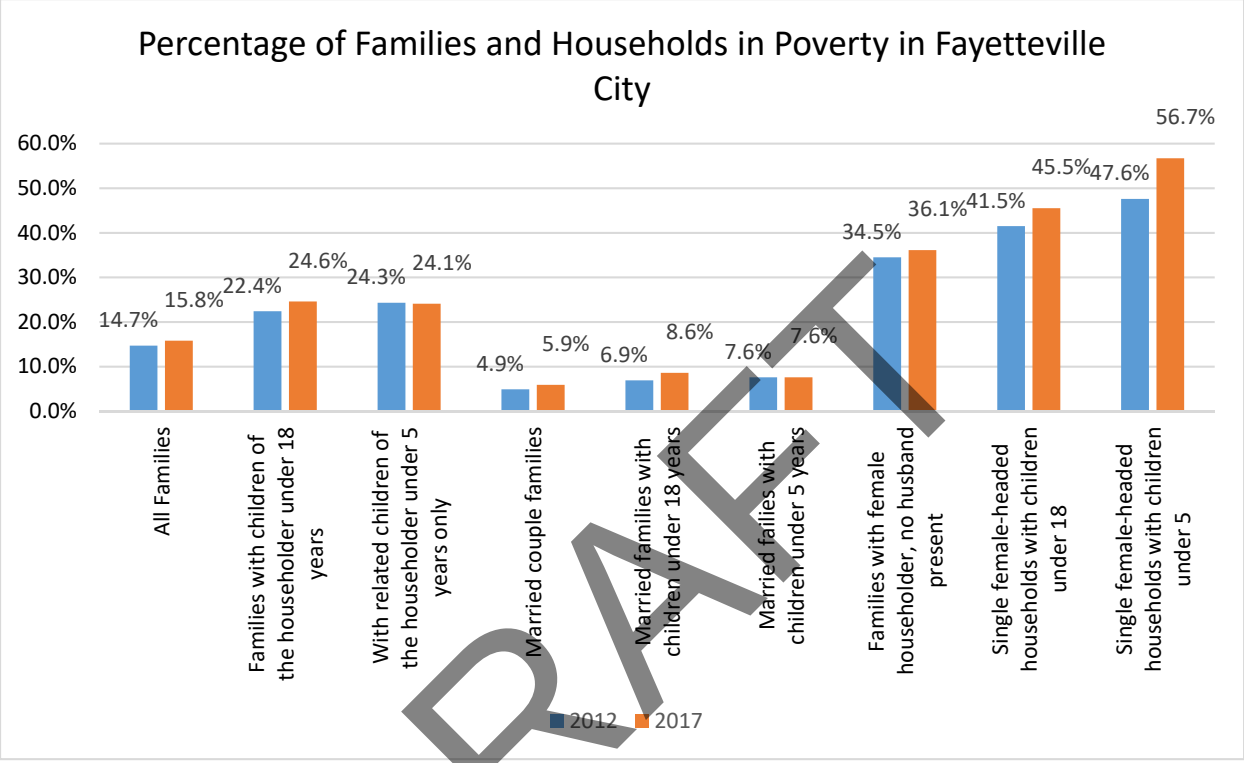


CUMBERLAND COUNTY, NORTH CAROLINA
LMI AND MINORITY PERCENT BY BLOCK GROUP

URBAN DESIGN VENTURES

Family and Household Poverty – Fayetteville City

Fayetteville City's poverty statistics for families with children are highlighted in the chart below.



Source: 2008-2012 and 2013-2017 ACS

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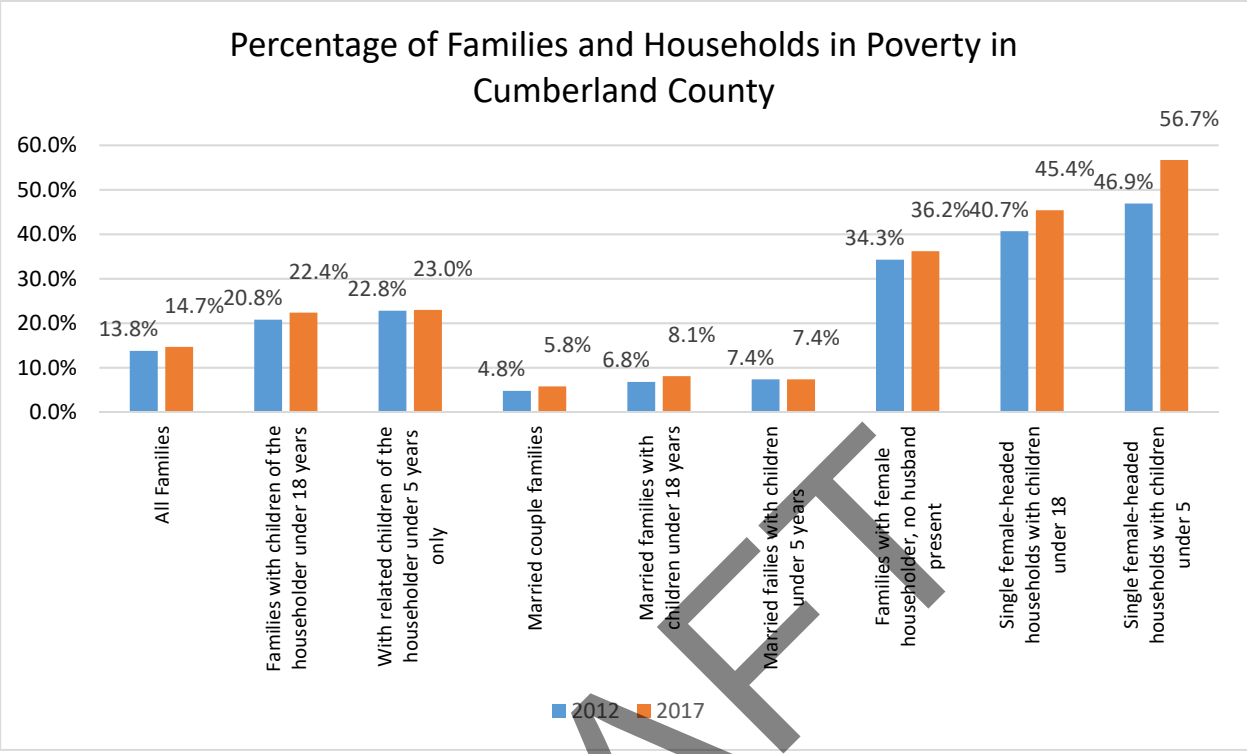
Family and Household Poverty – Cumberland County

Cumberland County's poverty statistics for families with children are highlighted in the chart below.



Source: 2008-2012 and 2013-2017 ACS

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In Cumberland County, the percentage of all families living in poverty experienced an increase from 13.87% in 2012 to 14.7% in 2017. The City of Fayetteville has a slightly higher poverty rate than Cumberland County as a whole, and it increased to 15.8% in 2017. The percentage of female-headed householders with no husband present and with children under 18 years in poverty was 41.5% in 2012 and increased to 45.5% in 2017 in the City, and from 40.7% to 45.4% in the County. The number of single female-headed households in poverty in both the City and the County continues to rise.

D. Employment

Occupation – Fayetteville City

In 2012, according to 2008-2012 ACS Estimates, the total number of eligible workers (population 16 years and over) in Fayetteville City was 103,670 persons. In 2012, 52.5 percent (80,807 persons) of eligible workers were in

the civilian labor force, 14.9 percent of those employed were in the military, and 7.3 percent (11,255 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Fayetteville City was 165,830 persons. In 2017, 51.8 percent (85,901 persons) of eligible workers were in the labor force, 14.3 percent (23,689 persons) were in the military, and 5.6 percent (9,273 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 18.7 minutes.

Per the 2013-2017 American Community Survey, an estimated 24.7 percent (19,883 households) of all households in the Fayetteville City receive income from Social Security. The mean Social Security Income for 2017 was $16,625.

The following charts outline the distribution of Fayetteville City workers by occupation.

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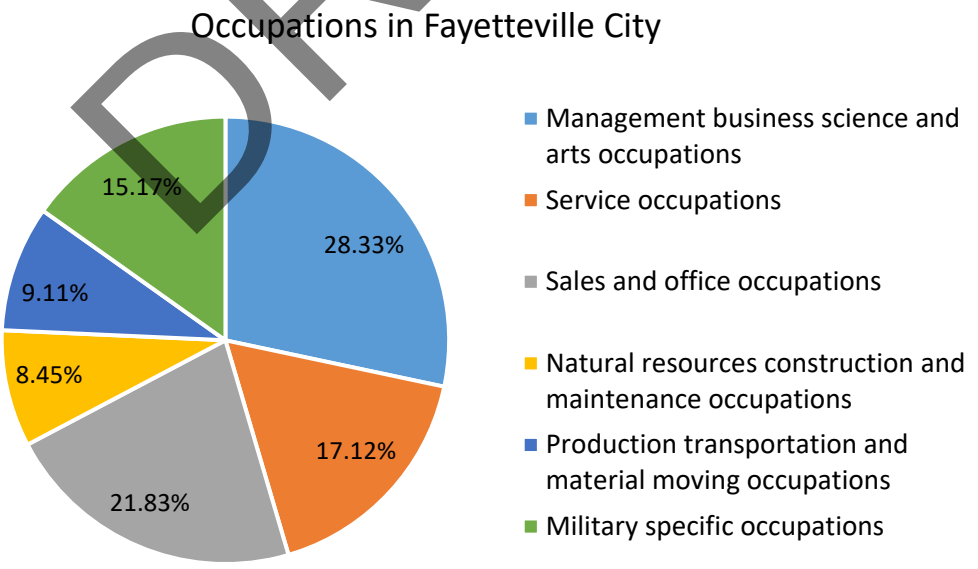
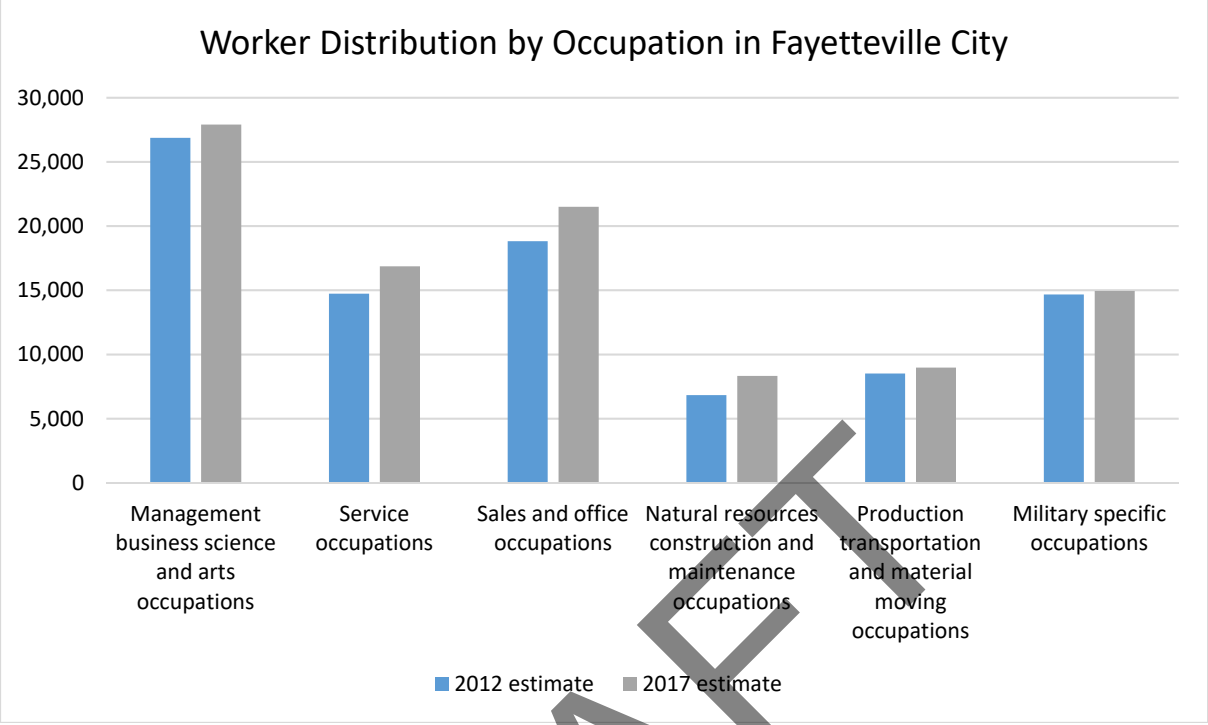
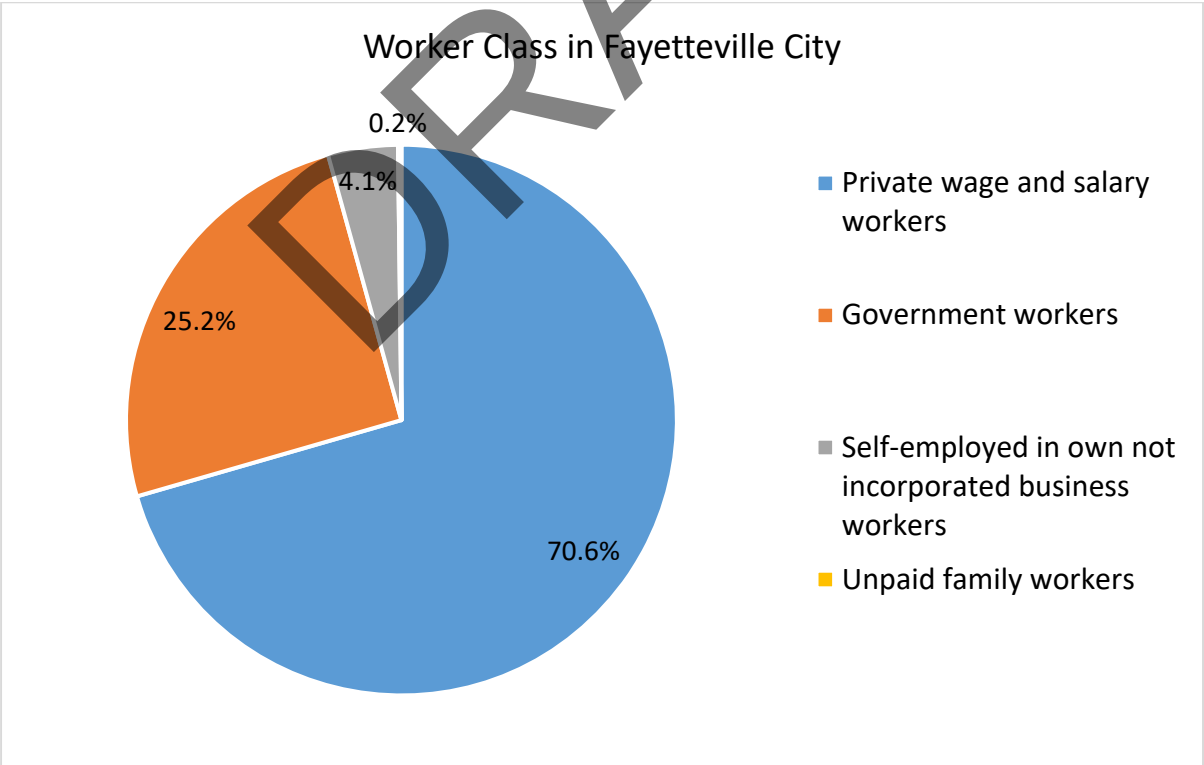


Source: 2013-2017 ACS



Source: 2006-2010 ACS and 2013-2017 ACS



Source: 2006-2010 ACS and 2013-2017 ACS

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Occupation – Cumberland County

In 2012, according to 2008-2012 ACS Estimates, the total number of eligible workers (population 16 years and over) in Cumberland County was 242,751 persons. In 2012, 67.0 percent (162,757 persons) of eligible workers were in the labor force, 11.8 percent (28,662 persons) were in the military, and 7.0 percent (17,068 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Cumberland County was 258,172 persons. In 2017, 64.9 percent (167,485 persons) of eligible workers were in the labor force, 11.5 percent (29,698 persons) were in the military, and 5.4 percent (13,819 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 18.7 minutes, which is the same as the City.

Per the 2013-2017 American Community Survey, an estimated 25.3 percent (31,519 households) of households in Cumberland County receive income from Social Security. The mean Social Security Income for 2017 was $16,896, which is only slightly above the City at $16,625.

The following charts outline the distribution of workers in Cumberland County by occupation.

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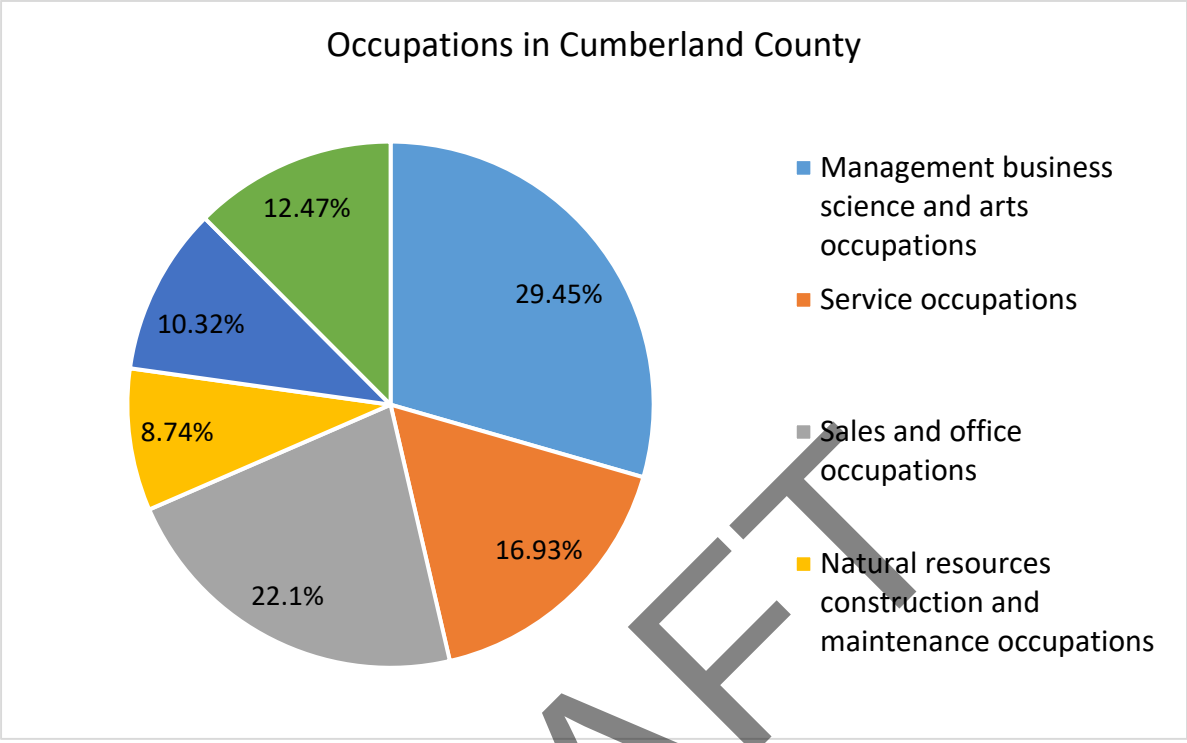
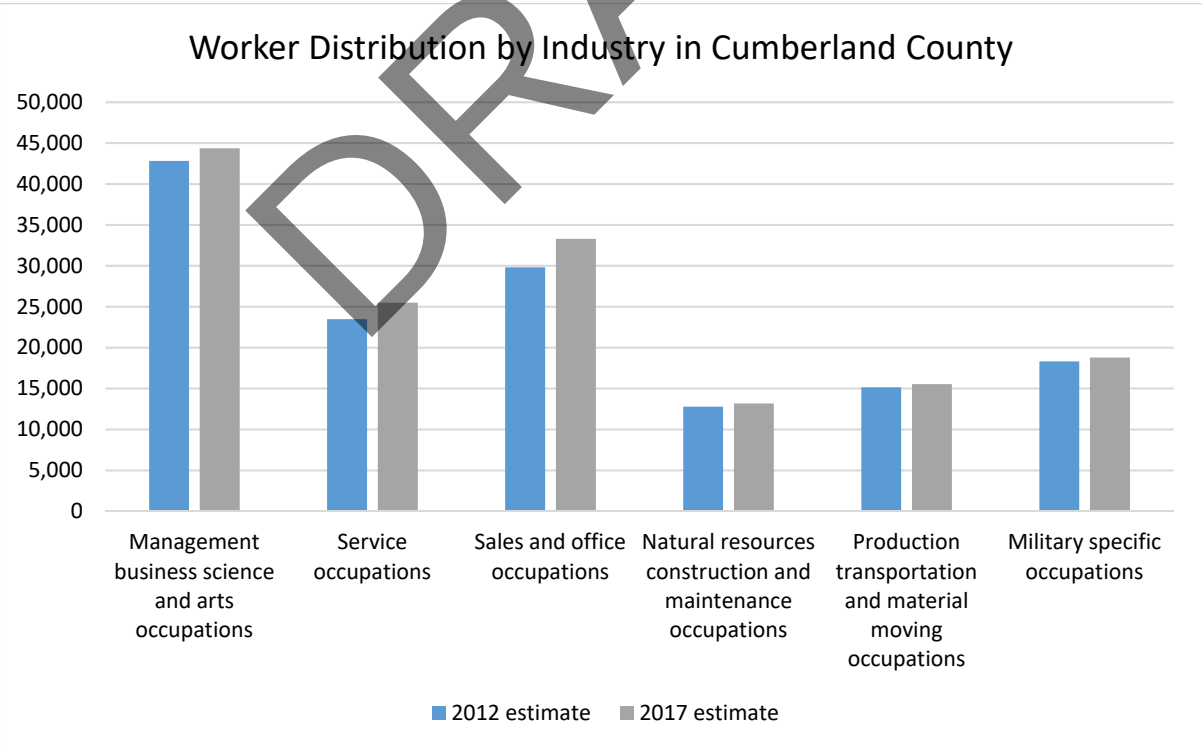


Source: 2013-2017 ACS



Source: 2006-2010 ACS and 2013-2017 ACS

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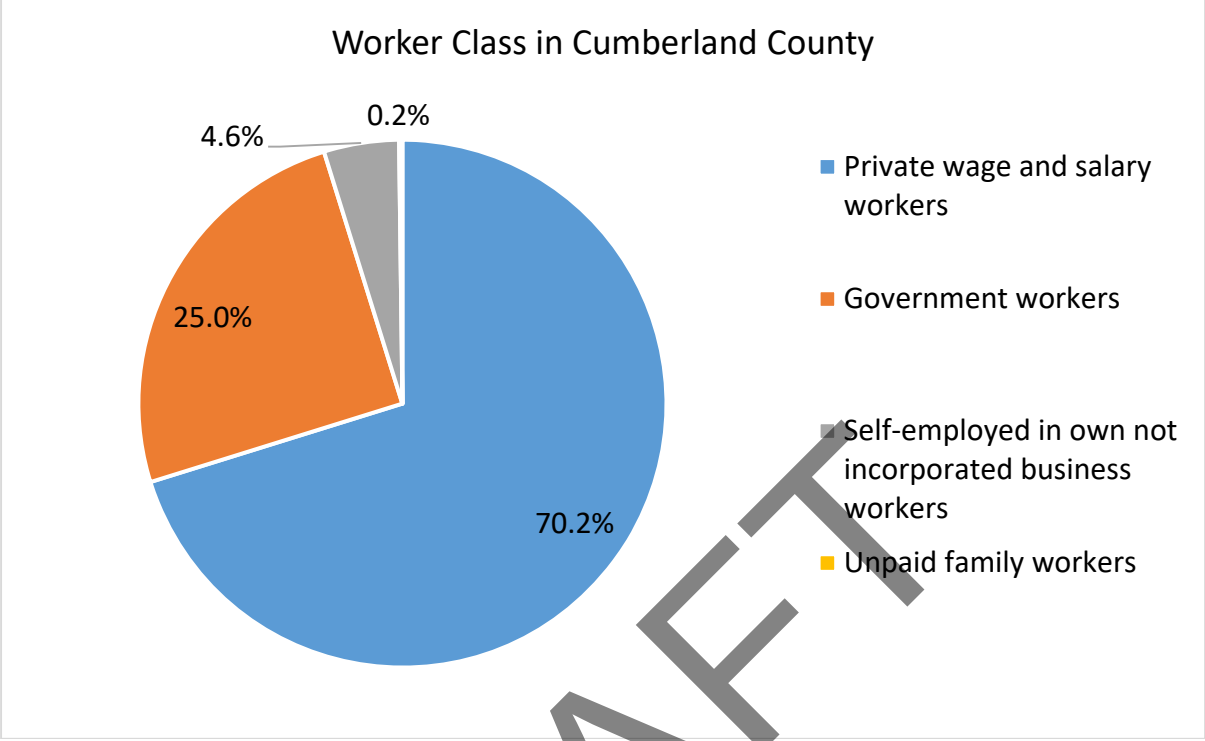

Source: 2013-2017 ACS

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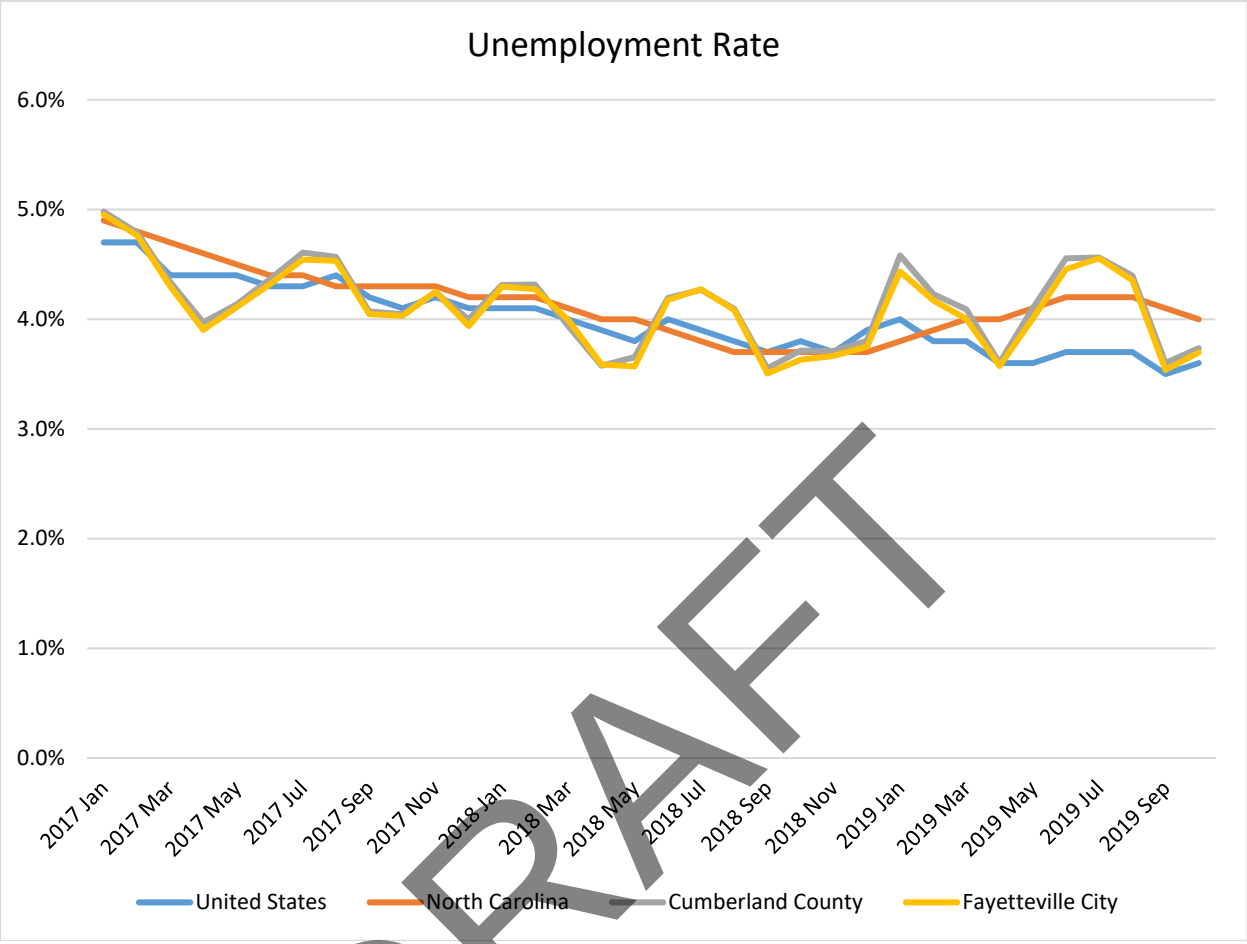
Unemployment Rate

The unemployment rate for the City of Fayetteville and Cumberland County is shown in comparison with the unemployment rate in the State of North Carolina and the Nation.



Source: Bureau of Labor Statistics

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The unemployment rates for the City of Fayetteville and Cumberland County are not seasonally adjusted. From January 2017 to September 2019, the City's unemployment rate was an average of 1.2 percentage points higher than the national unemployment rate, the County's unemployment rate was an average of 1.1 percentage points higher than the national unemployment rate and both the City and County deviated negligibly from the State unemployment rate.

The trends suggest that from January 2017 to September 2019 the unemployment rate in Cumberland County increased at a faster rate than the national average in 2019, which was a statewide trend for North Carolina.

E. Housing Profile

Almost three-quarters of the City's and County's housing stock (74.99%) was built after 1970, which coincides with the County's recent growth. Only 5.3% of its housing stock was built after 2009. The oldest housing stock in the region is within the City of Fayetteville, though it is not prevalent; approximately 1.6% of the City's housing stock was built prior to 1939 and a quarter (25.01%) was built prior to 1970. The following chart illustrates the year that housing structures were built in Cumberland County based on the 2013-2017 American Community Survey.

Housing Profile – Fayetteville City

The following table chart details the year that housing structures were built in Fayetteville City as of 2017.

Year Structure Built in Fayetteville City

Housing Profile	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	**86,929**	**-**	**94,652**	**-**
Built 2014 or later	-	-	853	0.90%
Built 2010 to 2013	419	0.48%	4,234	4.47%
Built 2000 to 2009	14,729	16.94%	12,453	13.16%
Built 1990 to 1999	15,260	17.55%	16,692	17.64%
Built 1980 to 1989	14,664	16.87%	16,829	17.78%
Built 1970 to 1979	16,725	19.24%	19,917	21.04%
Built 1960 to 1969	12,908	14.85%	12,725	13.44%
Built 1950 to 1959	7,258	8.35%	6,812	7.20%
Built 1940 to 1949	2,506	2.88%	2,641	2.79%
Built 1939 or earlier	2,460	2.83%	1,496	1.58%

Source: 2008-2012 ACS and 2013-2017 ACS

The majority of housing units in Fayetteville City are 1-unit detached comprising 62.8 percent (54,583 units) of housing units.

The following graph illustrates the composition of the housing stock in Fayetteville City as of 2017.

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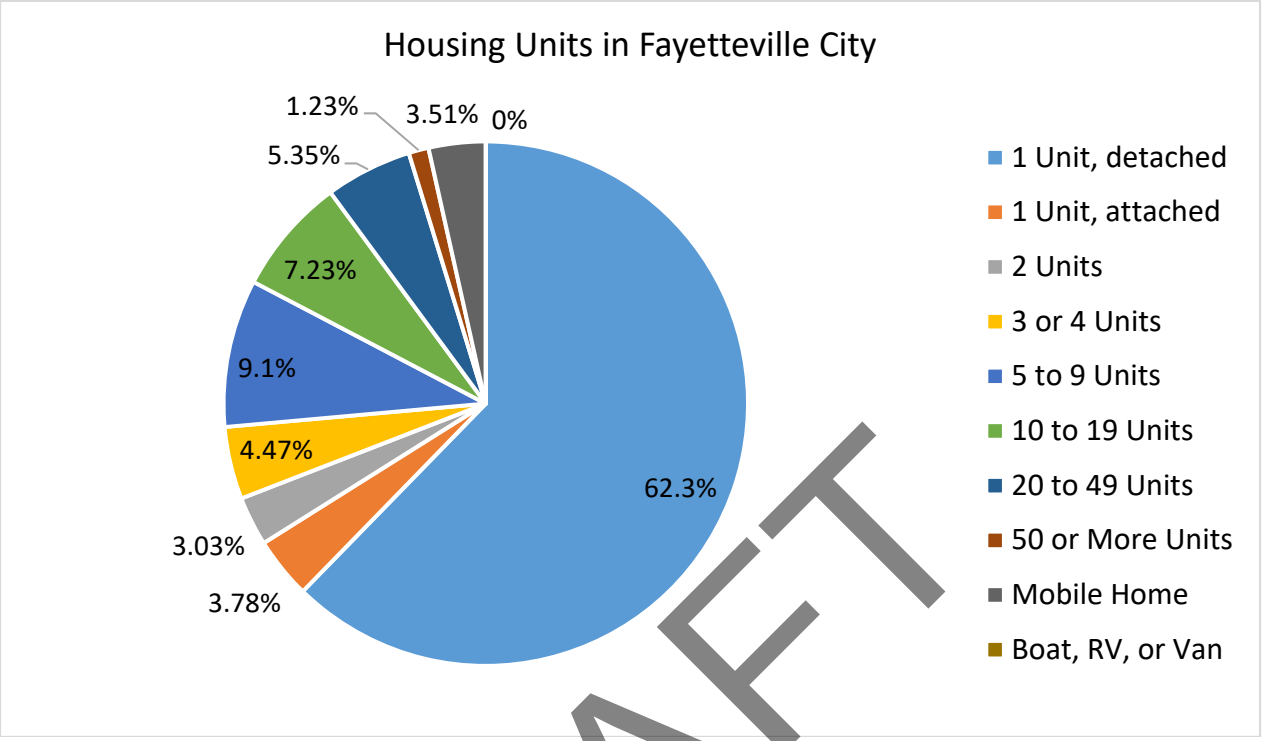

Source: 2013-2017 ACS

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Housing Profile – Cumberland County

The following table chart details the year that housing structures were built in Cumberland County as of 2017.

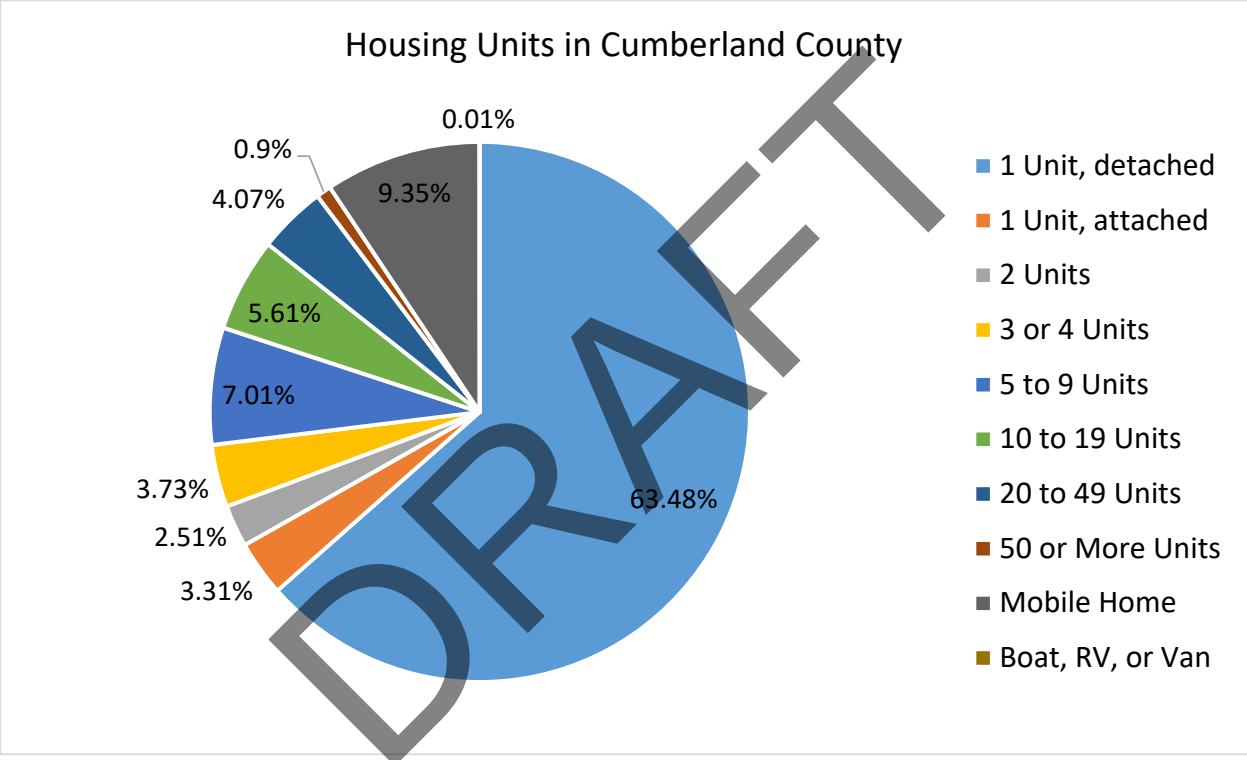
Year Structure Built in Cumberland County

Housing Profile	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Housing Units	**136,701**	**-**	**145,090**	**-**
Built 2014 or later	-	-	1,316	0.91%
Built 2010 to 2013	982	0.72	7,160	4.93%
Built 2000 to 2009	27,611	20.20	24,278	16.73%
Built 1990 to 1999	27,570	20.17	29,405	20.27%
Built 1980 to 1989	22,464	16.43	24,285	16.74%
Built 1970 to 1979	24,396	17.85	26,887	18.53%
Built 1960 to 1969	17,673	12.93	16,668	11.49%
Built 1950 to 1959	9,407	6.88	9,057	6.24%
Built 1940 to 1949	3,437	2.51	3,476	2.40%
Built 1939 or earlier	3,161	2.31	2,558	1.76%

Source: 2008-2012 and 2013-2017 ACS

The majority of housing units in Cumberland County are 1-unit detached comprising 74.8 percent (86,907 units) of all housing units. The second most common type of housing unit in Cumberland County is a mobile home, and mobile homes make up 9.35% (13,560 units) of the housing units.

The following graph illustrates the composition of the housing stock in Cumberland County as of 2017.



Source: 2013-2017 ACS

As shown in the previous charts, single-unit detached houses remain the most prevalent type of housing in the County by a wide margin. The number of 1-unit attached homes increased, while the number of 1-unit detached houses showed a slight decrease. All other housing types stayed fairly consistent or has a slight change in their prevalence.

The median value of owner-occupied homes in Cumberland County in 2012 was $126,300 compared to $123,300 in the City of Fayetteville. The 2013-2017 American Community Survey estimates that the median value of owner-occupied homes in Cumberland County has increased since 2012 to

$131,200 while the median housing value in the City of Fayetteville increased to $128,500. The latest available data from real estate listings presented a similar value of home values in the County; according to Zillow, the median list price of a home in Cumberland County was $123,858 in November of 2019 and $119,859 in the City of Fayetteville.

The following table outlines the number of new units for which building permits were filed annually for Cumberland County. Both the City of Fayetteville and Cumberland County have seen a substantial decrease in the total number of new units constructed since 2008, although it has remained constant since 2018.

The table below contains data on the number of permits for residential construction issued by jurisdictions in Cumberland County.

Units Authorized by Building Permits – Fayetteville, NC Metro Area

YEAR	Total	Single Family	Multi-Family	5+ Units
2019	807	589	218	210
2018	575	563	12	0
2017	716	655	61	61
2016	717	623	94	88
2015	1,112	664	448	446
2014	852	775	77	77
2013	1,247	926	321	321
2012	2,342	962	1,380	1,374
2011	2,307	1,017	1,290	1,284
2010	2,906	939	1,967	1,964
2009	1,966	1,116	850	828
2008	1,739	903	836	834

Source: SOCDS Building Permits Database, HUD

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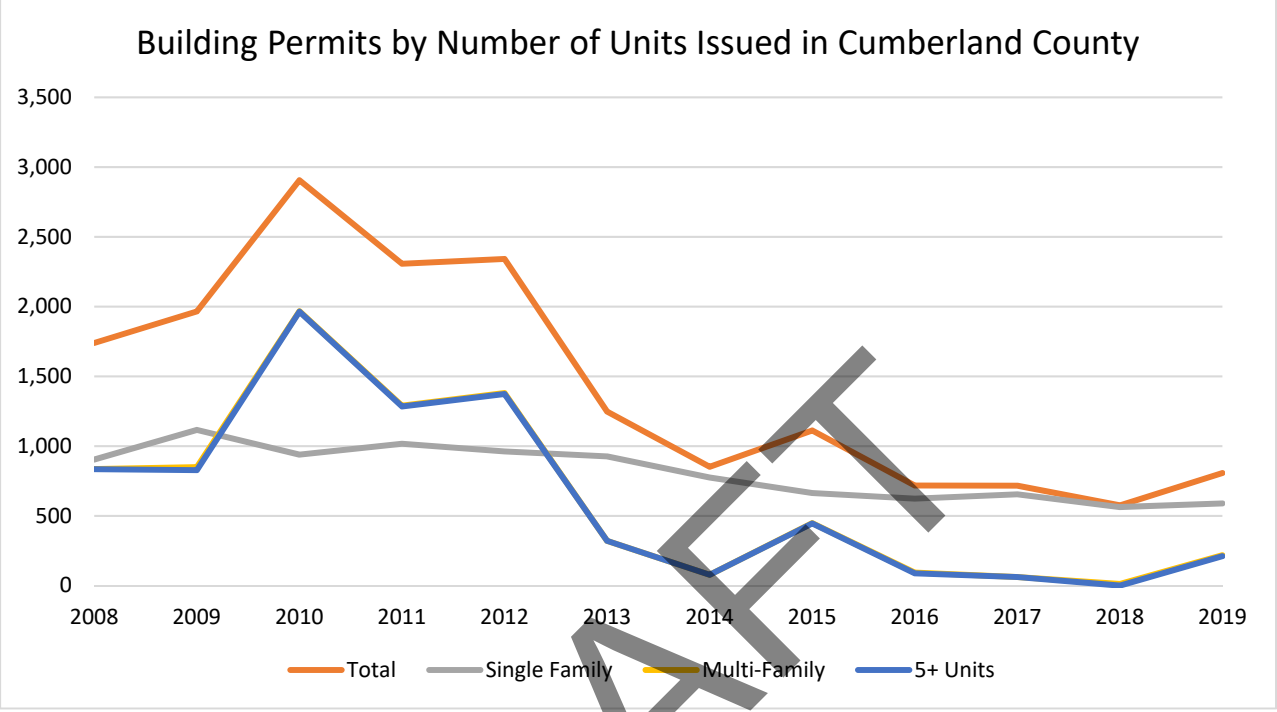

Source: SOCDS Building Permits Database, HUD

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The area has seen an overall decrease in the total number of new units constructed most notably Multi-Family homes. Across the 15-year period, an average of 56.3 percent of new units each year were for single family units.

The year with the highest number of units authorized was 2011 and the year with the highest number of single-family units was 2009. The average number of total units authorized per year in the years following the 2008-2009 housing crash increased, but has since decreased substantially in the later half of the 2010 decade.

F. Financing

Owner Costs – Fayetteville City

The median monthly housing cost for owner-occupied households was $1,044 in 2012 and $957 in 2017. The median monthly housing cost for owner-occupied households decreased by 8.33 percent ($87) from 2012 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly owner costs in 2012 and 2017.

Monthly Owner Costs in Fayetteville City

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	**38,800**	**44.6%**	**36,329**	**38.4%**
Less than $300	436	1.12%	1,730	4.77%
$300 to $499	4,166	10.74%	6,450	17.76%
$500 to $799	6,138	15.82%	6,100	16.79%
$800 to $999	4,681	12.06%	4,965	13.67%
$1,000 to $1,499	14,933	38.48%	10,645	29.31%
$1,500 to $1,999	4,989	12.86%	4,175	11.49%
$2,000 or more	3,457	8.91%	1,154	3.18%
No Cash Rent	-	-	-	-
Median (dollars)	$1,044	-	$957	-

Source: 2008-2012 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2010-2014 ACS and the 2013-2017 ACS.

Monthly Owner Costs as a Percentage of Household Income in Fayetteville City

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	**38,800**	**44.6%**	**36,329**	**38.4%**
Less than $20,000	**4,268**	**11.00%**	**4,087**	**11.25%**
Less than 20 percent	272	0.70%	230	0.63%
20 to 29 percent	776	2.00%	444	1.22%
30 percent or more	3,220	8.30%	3,413	9.39%
$20,000 to $34,999	**5,587**	**14.40%**	**4,980**	**13.71%**
Less than 20 percent	1,513	3.90%	1,273	3.50%
20 to 29 percent	854	2.20%	785	2.16%
30 percent or more	3,220	8.30%	2,922	8.04%

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$35,000 to $49,999	**5,781**	**14.90%**	**5,340**	**14.70%**
Less than 20 percent	1,901	4.90%	1,877	5.17%
20 to 29 percent	1,746	4.50%	1,452	4.00%
30 percent or more	2,134	5.50%	2,011	5.54%
$50,000 to $74,999	**8,342**	**21.50%**	**8,061**	**22.19%**
Less than 20 percent	3,802	9.80%	4,292	11.81%
20 to 29 percent	3,026	7.80%	2,538	6.99%
30 percent or more	1,552	4.00%	1,231	3.39%
$75,000 or more	**14,240**	**36.70%**	**13,440**	**37.00%**
Less than 20 percent	10,864	28.00%	11,305	31.12%
20 to 29 percent	2,794	7.20%	1,714	4.72%
30 percent or more	582	1.50%	421	1.16%
Zero or negative income	**543**	**1.40%**	**421**	**1.16%**
No cash rent	-	-	-	-

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 27.6 percent (10,709 units) of owner-occupied units were cost burdened and 27.5 percent (9,998 units) of owner-occupied households in 2017 were cost burdened.

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Owner Costs – Cumberland County

The median monthly housing cost for owner-occupied households was $950 in 2012 and $957 in 2017. The median monthly housing cost for owner-occupied households increased by less than one percent ($7) from 2012 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly owner costs in 2012 and 2017.

Monthly Owner Costs in Cumberland County

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	**67,499**	**49.4%**	**63,533**	**43.8%**
Less than $300	1,401	2.08%	4,618	7.27%

$300 to $499	8,229	12.19%	10,704	16.85%
$500 to $799	9,884	14.65%	10,265	16.16%
$800 to $999	7,775	11.51%	8,234	12.96%
$1,000 to $1,499	24,562	36.39%	17,710	27.87%
$1,500 to $1,999	9,325	13.82%	7,834	12.33%
$2,000 or more	6,323	9.37%	2,403	3.78%
No Cash Rent	-	-	-	-
Median (dollars)	$1,035	-	$950	-

Source: 2008-2012 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2012 and 2017 according to the 2008-2012 ACS and the 2013-2017 ACS.

Monthly Owner Costs as a Percentage of Household Income in Cumberland County

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	**67,499**	**49.4%**	**63,533**	**43.8%**
Less than $20,000	**7,425**	**11.0%**	**7,271**	**11.44%**
Less than 20 percent	270	0.4%	777	1.22%
20 to 29 percent	1,215	1.8%	966	1.52%
30 percent or more	5,940	8.8%	5,528	8.70%
$20,000 to $34,999	**9,787**	**14.5%**	**8,740**	**13.76%**
Less than 20 percent	2,160	3.2%	2,511	3.95%
20 to 29 percent	1,417	2.1%	1,541	2.43%
30 percent or more	6,142	9.1%	4,688	7.38%
$35,000 to $49,999	**10,395**	**15.4%**	**9,263**	**14.58%**
Less than 20 percent	3,105	4.6%	3,487	5.49%
20 to 29 percent	3,375	5.0%	2,506	3.94%
30 percent or more	3,915	5.8%	3,270	5.15%
$50,000 to $74,999	**15,660**	**23.2%**	**13,384**	**21.07%**
Less than 20 percent	6,750	10.0%	9,636	15.17%
20 to 29 percent	6,075	9.0%	4,344	6.84%
30 percent or more	2,835	4.2%	2,104	3.31%
$75,000 or more	**23,490**	**34.8%**	**24,012**	**37.79%**
Less than 20 percent	18,495	27.4%	19,640	30.91%

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20 to 29 percent	3,915	5.8%	3,716	5.85%
30 percent or more	1,080	1.6%	656	1.03%
Zero or negative income	**810**	**1.2%**	**863**	**1.36%**
No cash rent	-	-	-	-

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 29.5 percent (19,912 units) of owner-occupied units were cost burdened and 25.6 percent (16,246 units) of owner-occupied households in 2017 were cost burdened.

According to **www.zillow.com**, the median list price for a two-bedroom housing unit in the City of Fayetteville was $152,000 in November 2019, and $162,000 for Cumberland County as a whole. The average price per square foot in the City of Fayetteville is $101 in the same time period, and $104 in Cumberland County.

Foreclosures

According to **www.realtytrac.com**, Cumberland County had 578 foreclosures at a rate of 1 in every 1,110, or 0.09% in November, 2019, and the City of Fayetteville had 96 homes in foreclosure at a rate of 1 in every 1,188, or 0.08% as of November of 2019. This means that 482 foreclosures in the County were outside of the City of Fayetteville.

Legal Aid of North Carolina has a division dedicated to assisting households experiencing foreclosures. The foreclosure rate in the City still remains higher than that of the State of North Carolina, which has a foreclosure rate of 1 in every 2,324, or 0.04%.

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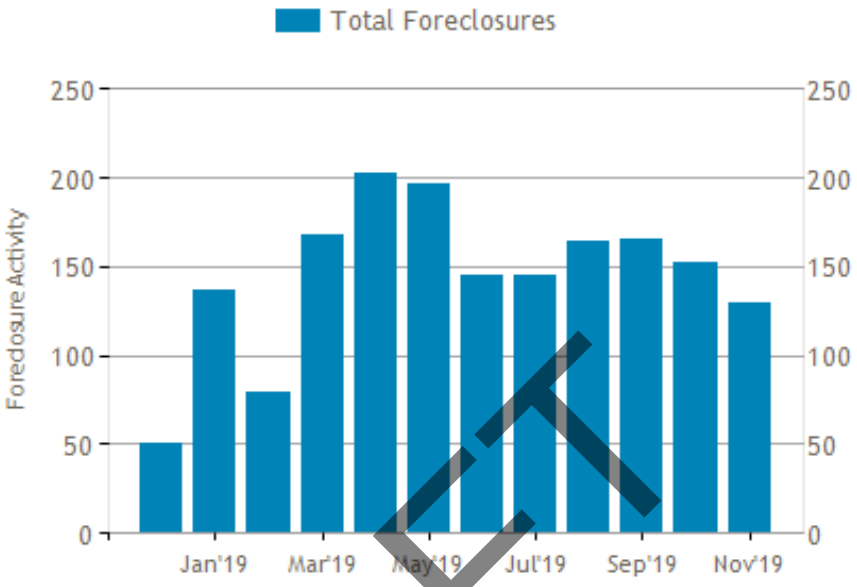
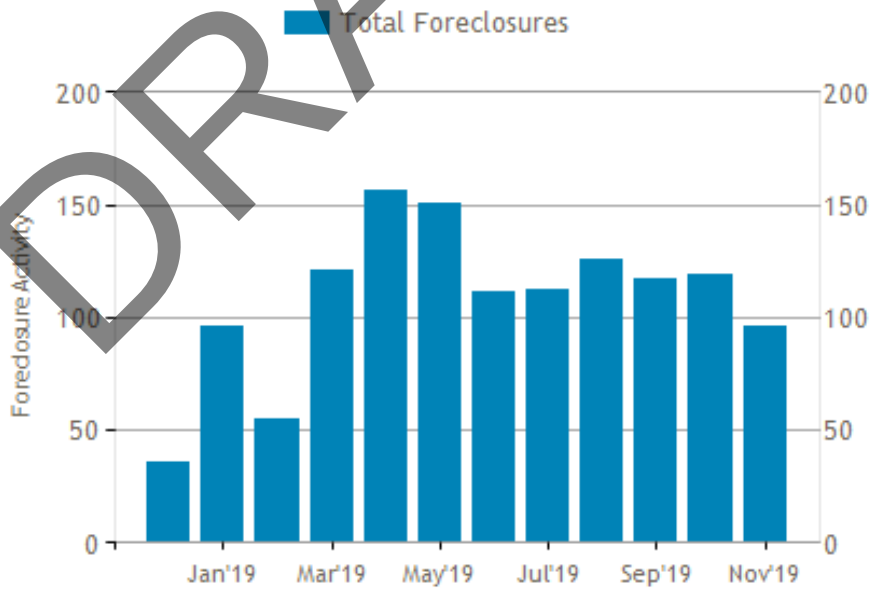
Number of Foreclosures in Cumberland County, NC



Number of Foreclosures in the City of Fayetteville, NC



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The number of foreclosures for Cumberland County was at its highest in April of 2019 with 202 foreclosures. Foreclosures in the City of Fayetteville also peaked at this point at 157 foreclosures. While foreclosures can negatively

impact a community, it offers a chance for the County and non-profit housing agencies to purchase homes and resell them to low-income households.

Renter Costs – Fayetteville City

The median monthly housing cost for renter-occupied households was $862 in 2012; and $892 in 2017. The median monthly housing cost for renter-occupied households increased by 3.5 percent ($30) from 2012 to 2017. Dollar amounts are adjusted for inflation.

The following table illustrates mortgage status and selected monthly renter costs in 2012 and 2017.

Selected Monthly Renter Costs in Fayetteville City

Monthly Renter Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	**37,241**	**49.0%**	**44,122**	**54.8%**
Less than $300	1,211	3.24%	1,160	2.63%
$300 to $499	2,207	5.93%	1,818	4.12%
$500 to $799	11,204	30.09%	12,469	28.25%
$800 to $999	9,790	26.28%	11,274	25.55%
$1,000 to $1,499	10,206	27.4%	13,568	30.75%
$1,500 to $1,999	897	2.41%	1,483	3.36%
$2,000 or more	1,726	4.63%	172	0.39%
No Cash Rent	1,532	4.11%	2,106	4.77%
Median (dollars)	$862	(X)	$892	(X)

Source: 2008-2012 and 2013-2017 American Community Survey

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The following table illustrates housing costs for owner-households in 2012 and 2017 according to the 2008-2012 ACS and the 2013-2017 ACS.

Selected Monthly Renter Costs as a Percentage of Household Income in Fayetteville City

Renter Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	**37,241**	**48.97%**	**44,122**	**54.84%**

Less than $20,000	**8,516**	**11.20%**	**9,642**	**11.98%**
Less than 20 percent	224	0.29%	227	0.28%
20 to 29 percent	445	0.59%	406	0.50%
30 percent or more	7,847	10.32%	9,009	11.20%
$20,000 to $34,999	**8,550**	**11.24%**	**11,127**	**13.83%**
Less than 20 percent	566	0.74%	408	0.51%
20 to 29 percent	1,959	2.58%	1,827	2.27%
30 percent or more	6,025	7.92%	8,892	11.05%
$35,000 to $49,999	**6,966**	**9.16%**	**7,601**	**9.45%**
Less than 20 percent	966	1.27%	941	1.17%
20 to 29 percent	3,951	5.20%	3,959	4.92%
30 percent or more	2,049	2.69%	2,701	3.36%
$50,000 to $74,999	**6,143**	**8.08%**	**7,111**	**8.84%**
Less than 20 percent	3,081	4.05%	3,485	4.33%
20 to 29 percent	2,743	3.61%	3,181	3.95%
30 percent or more	319	0.42%	445	0.55%
$75,000 or more	**4,654**	**6.12%**	**5,482**	**6.81%**
Less than 20 percent	4,258	5.60%	4,826	6.00%
20 to 29 percent	368	0.48%	617	0.77%
30 percent or more	28	0.04%	39	0.05%
Zero or negative income	**880**	**1.16%**	**1,053**	**1.31%**
No cash rent	1,532	2.01%	2,106	2.62%

Source: 2008-2012 and 2013-2017 American Community Survey

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Gross Rent as a Percentage of Household Income in Fayetteville City

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	**35,709**	**96.53%**	**42,016**	**95.23%**
Less than 15 percent	4,266	11.46%	4,719	10.7%
15 to 19 percent	4,829	12.97%	5,168	11.71%
20 to 24 percent	5,237	14.06%	5,179	11.74%
25 to 29 percent	4,229	11.36%	4,811	10.9%
30 to 34 percent	3,410	9.16%	4,023	9.12%
35 percent or more	12,858	34.52%	17,063	38.67%
Not computed	2,412	6.48%	3,159	7.16%

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 43.7 percent (16,268 units) of renter-occupied units were cost burdened and 47.8 percent (21,086 units) of renter-occupied households in 2017 were cost burdened.

In 2012, 27.6 percent (10,709 units) of owner-occupied households were cost burdened whereas 43.7 percent (16,268 units) of renter-occupied households were cost burdened. In 2017, 27.5 percent (9,998 units) of owner-occupied households were cost burdened whereas 47.8 percent (21,086 units) of renter-occupied households were cost burdened.

Renter Costs – Cumberland County

The median monthly housing cost for renter-occupied households was $844 in 2012; and $887 in 2017. The median monthly housing cost for renter-occupied households increased by 5.09 percent ($43) from 2012 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly renter costs in 2012 and 2017.

Selected Monthly Renter Costs in Cumberland County

Monthly Renter Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	**52,224**	**43.62%**	**60,967**	**48.97%**
Less than $300	1,686	3.23%	1,405	2.31%
$300 to $499	3,434	6.57%	3,028	4.96%
$500 to $799	16,540	31.67%	17,449	28.62%
$800 to $999	12,921	24.75%	14,846	24.35%
$1,000 to $1,499	13,279	25.42%	17,974	29.48%
$1,500 to $1,999	1,370	2.62%	2,441	4.00%
$2,000 or more	2,994	5.73%	324	0.54%
No Cash Rent	2,669	5.11%	3,428	5.62%
Median (dollars)	$844	-	$887	-

Source: 2008-2012 and 2013-2017 American Community Survey

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The following table illustrates housing costs for renter-occupied households in 2012 and 2017 according to the 2008-2012 ACS and the 2013-2017 ACS.

Selected Monthly Renter Costs as a Percentage of Household Income in Cumberland County

Renter Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	**52,224**	**43.62%**	**60,967**	**48.97%**
Less than $20,000	**12,438**	**10.39%**	**13,546**	**10.88%**
Less than 20 percent	251	0.21%	269	0.22%
20 to 29 percent	769	0.64%	518	0.42%
30 percent or more	11,418	9.54%	12,759	10.25%
$20,000 to $34,999	**12,123**	**10.13%**	**15,147**	**12.17%**
Less than 20 percent	733	0.61%	550	0.44%
20 to 29 percent	3,064	2.56%	2,648	2.13%
30 percent or more	8,326	6.95%	11,949	9.60%
$35,000 to $49,999	**9,116**	**7.61%**	**10,269**	**8.25%**
Less than 20 percent	1,447	1.21%	1,319	1.06%
20 to 29 percent	5,036	4.21%	5,224	4.20%
30 percent or more	2,633	2.20%	3,726	2.99%
$50,000 to $74,999	**8,336**	**6.96%**	**9,535**	**7.66%**
Less than 20 percent	4,358	3.64%	4,675	3.76%
20 to 29 percent	3,481	2.91%	4,145	3.33%
30 percent or more	497	0.42%	715	0.57%
$75,000 or more	**6,222**	**5.20%**	**7,653**	**6.15%**
Less than 20 percent	5,582	4.66%	6,538	5.25%
20 to 29 percent	573	0.48%	1,048	0.84%
30 percent or more	67	0.06%	67	0.05%
Zero or negative income	**1,320**	**1.10%**	**1,389**	**1.12%**
No cash rent	2,669	2.23%	3,428	2.75%

Source: 2008-2012 and 2013-2017 American Community Survey

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Gross Rent as a Percentage of Household Income in Cumberland County

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	**52,224**	**-**	**60,967**	**-**
Less than 15 percent	5,886	11.28%	6,399	10.49%
15 to 19 percent	6,485	12.42%	6,952	11.40%
20 to 24 percent	7,106	13.61%	7,222	11.85%
25 to 29 percent	5,817	11.14%	6,361	10.43%
30 to 34 percent	4,503	8.62%	5,693	9.34%
35 percent or more	18,438	35.31%	23,523	38.58%
Not computed	3,989	7.64%	4,817	7.90%

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 43.9 percent (22,941 units) of renter-occupied units were cost burdened and 47.9 percent (29,216 units) of renter-occupied households in 2017 were cost burdened.

In 2012, 29.5 percent (19,912 units) of owner-occupied households were cost burdened whereas 43.9 percent (22,941 units) of renter-occupied households were cost burdened. In 2017, 25.6 percent (16,246 units) of owner-occupied households were cost burdened whereas 47.9 percent (29,216 units) of renter-occupied households were cost burdened.

The 2019 and 2020 HUD Fair Market Rents and HOME Rent Limits for the Metro Area are shown in the table below.

Fair Market Rents (FMR) and HOME Rent Limits for the Metro Area

Rent	FY 2019	FY 2020	Change in FMR 2018 to 2019
Efficiency	$745	$719	-$26
One-Bedroom	$749	$722	-$27
Two-Bedroom	$893	$854	-$39

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Three-Bedroom	$1,246	$1,188	-$58
Four-Bedroom	$1,529	$1,450	-$79

Source: U.S. Department of Housing and Urban Development

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD's Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and the Section 8 Income Limits.

The area median rent is estimated to be $887 according to the 2013-2017 ACS data, while the median rent in Cumberland County for a two-bedroom apartment is $783 according to Zillow in November, 2019. The average rents posted commercially are not the area median rent and fair market rents. The rental market in Cumberland County is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the area.

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G. Household Types

Based on a comparison between the 2012 and 2017 population, Cumberland County had a 0.7% increase in its population. The population increase was 2,322 persons, and the housing supply increased by 5,593 households. The populations of the City of Fayetteville and Cumberland County have increased substantially, largely from the growth of the City. However, there are neighborhoods of the City of Fayetteville and Cumberland County with poor housing stock. The median income of the area decreased by 1.49% from $45,413 to $44,737. This decrease in median income represents a change in nominal dollars and not a change in real dollars. Wages in the Fayetteville-Cumberland County region have fallen, exacerbating housing disparities in the region that already exist.

Changes Between 2012 & 2017

Demographics	2012	2017	% Change
Population	330,224	332,546	**+0.70%**
Households	140,992	146,585	**+3.97%**
Household Median Income	$45,413	$44,737	**-1.49%**

Data Source: 2008-2012 and 2013-2017 American Community Surveys

Note:
According to the U.S. Census Bureau the following notes were issued in regard to the CHAS (Comprehensive Housing Affordability Strategy) and the discrepancies in adding up the totals in the following tables. As with the CHAS 2000 and all other special tabulations of Census data, the Census Bureau requires that the CHAS data be rounded. The rounding scheme is as follows: 0 remains 0; 1-7 rounds to 4; 8 or greater rounds to nearest multiple of 5. This causes discrepancies when adding up smaller geographies and when adding up data within CHAS tables. Consider a city where the CHAS data indicate that there were 4 renter households with extremely low income and 4 owner households with extremely low income. One might be tempted to conclude that there are 8 total households with extremely low income. If another CHAS table indicates that there are actually a total of 15 extremely low income households, that would appear to be contradictory. This situation is the result of rounding. The County could have 6 renter households with extremely low income and 7 owner occupied households with extremely low income, which is a total of 13 extremely low income households; but all of these numbers would be rounded, to 4, 4, and 15.

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Number of Households Table – City of Fayetteville

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Total Households *	**17,320**	**14,845**	**27,390**	**17,064**	**81,108**
Small Family Households *	7,275	6,435	11,405	8,095	38,420
Large Family Households *	1,265	725	1,690	985	5,054
Household contains at least one person 62-74 years of age	1,140	690	960	585	1,525

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Household contains at least one person age 75 or older	400	485	465	230	440
Households with one or more children 6 years old or younger *	1,745	1,615	1,495	635	1,490

Data Source: 2012-2016 CHAS

Number of Households Table – Cumberland County

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Total Households *	**26,530**	**24,350**	**41,875**	**26,655**	**126,975**
Small Family Households *	10,865	10,105	17,295	12,415	64,385
Large Family Households *	2,065	1,440	3,310	2,000	9,045
Household contains at least one person 62-74 years of age	1,840	2,455	3,255	2,260	11,285
Household contains at least one person age 75 or older	1,100	1,390	2,180	970	4,710
Households with one or more children 6 years old or younger *	3,395	2,644	4,925	2,970	9,055

Data Source: 2012-2016 CHAS

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Of all households, slightly more than half (51.5%) have a higher income than the HUD Area Median Income (AMI) for the Fayetteville, NC, MSA. This includes both small and large family households, though there are few large family households under 100% AMI. The remaining 48.5% of total households make less than the AMI, with the largest remaining group (19.3% of total households) being those making between 50-80% of AMI. Households that make 30% of AMI have an annual income of $16,470; as HUD defines affordable housing as paying no more than 30% of income on rent, this leaves low-income households with less than $961 per month (without taking tax out) to spend on housing. The largest housing problem in the Cumberland County is housing affordability. According to the 2013-2017 ACS data, an estimated 47.9% of all renter households are cost overburdened by 30% or more in the County, and an estimated 25.6% of all owner households are cost overburdened by 30% or more. Approximately 31.1% of owner occupied households with a mortgage are cost overburdened by 30% or more, compared to only 14.2% of owner occupied households without a mortgage.

Housing Problems (Households with one of the listed needs) – City of Fayetteville

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	105	65	40	30	**275**	20	15	35	0	**130**
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	45	0	25	25	**150**	15	25	0	10	**115**
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	125	85	160	150	**710**	80	25	60	20	**345**
Housing cost burden greater than 50% of income (and none of the above problems)	3,805	2,705	970	55	**7,555**	1,655	715	940	270	**3,825**
Housing cost burden greater than 30% of income (and none of the above problems)	405	1,945	5,630	1,790	**10,700**	200	600	1,400	1,265	**5,285**
Zero/negative Income (and none of the above problems)	105	65	40	30	**275**	20	15	35	0	**130**

Data Source: 2012-2016 CHAS

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Housing Problems (Households with one of the listed needs) – Cumberland County

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	140	90	40	30	**340**	20	15	65	70	**225**
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	55	0	25	25	**205**	15	25	100	30	**260**
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	210	230	315	150	**1,160**	145	25	65	75	**635**
Housing cost burden greater than 50% of income (and none of the above problems)	5,630	3,935	1,530	85	**11,205**	2,480	1,340	1,380	500	**6,015**
Housing cost burden greater than 30% of income (and none of the above problems)	620	2,860	7,450	2,405	**14,580**	420	1,220	2,335	2,145	**9,030**
Zero/negative Income (and none of the above problems)	1,550	0	0	0	**1,550**	795	0	0	0	**795**

Data Source: 2012-2016 CHAS

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The following table illustrates the discrepancies between homeowners and renters regarding housing problems. While there are slightly more owner-occupied housing units than renter-occupied units (51.0% to 49.0%, respectively), renters face a much higher rate of housing problems.

Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden) – City of Fayetteville

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total
Having 1 or more of four housing problems	3,530	5,705	2,384	520	**4,415**	8,155	1,565	2,065	604	**8,695**
Having none of four housing problems	2,200	5,165	16,010	9,555	**32,550**	469	2,405	6,930	6,370	**31,740**
Household has negative income, but none of the other housing problems	2,095	0	0	0	**1,050**	865	0	0	0	**430**

Data Source: 2012-2016 CHAS

Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden) – Cumberland County

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	12,070	8,510	3,825	580	**12,905**	5,330	2,805	3,220	1,343	**7,135**
Having none of four housing problems	3,105	7,620	22,320	13,305	**44,825**	1,339	5,400	12,495	11,415	**55,965**

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	3,095	0	0	0	**1,550**	1,595	0	0	0	**795**

Data Source: 2012-2016 CHAS

While there are more owners facing severe housing problems than renters, renters have a much higher rate.

Cost Overburdened Greater Than 30% – City of Fayetteville

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	80	965	3,030	**5,560**	20	200	525	**2,165**
Large Related	35	215	200	**499**	20	30	170	**385**
Elderly	135	270	175	**644**	75	230	250	**975**
Other	180	500	2,180	**3,930**	40	90	285	**1,070**
Total need by income	**430**	**1,950**	**5,585**	**10,633**	**155**	**550**	**1,230**	**4,595**

Data Source: 2012-2016 CHAS

For those cost overburdened by more than 30%, renters are more likely to be highly affected; renter-occupied households are much likelier to be cost overburdened than owners.

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Cost Overburdened Greater Than 50% – City of Fayetteville

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,960	1,430	430	**3,820**	605	255	260	**1,120**
Large Related	350	60	55	**465**	115	10	75	**200**
Elderly	470	400	110	**980**	475	230	185	**890**
Other	305	120	40	**465**	45	50	25	**120**
Total need by income	**3,895**	**2,735**	**950**	**7,580**	**1,620**	**645**	**855**	**3,120**

Data Source: 2012-2016 CHAS

For those who are cost overburdened by more than 50%, renters are more highly affected than owners based on the total number of households.

Overcrowding Conditions – City of Fayetteville

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	155	70	180	140	**545**	65	40	40	14	**159**
Multiple, unrelated family households	20	15	4	35	**74**	25	10	15	15	**65**
Other, non-family households	0	0	0	20	**20**	0	10	0	0	**10**
Total need by income	**175**	**85**	**184**	**175**	**619**	**90**	**60**	**55**	**29**	**234**

Data Source: 2012-2016 CHAS

Cost Overburdened Greater Than 30% – Cumberland County

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	145	1,405	4,025	**7,575**	135	360	815	**3,760**
Large Related	35	365	400	**900**	25	35	255	**650**
Elderly	215	365	285	**975**	125	505	445	**1,635**

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	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	255	770	2,960	**5,105**	85	210	525	**1,845**
Total need by income	**650**	**2,905**	**7,400**	**14,555**	**370**	**1,110**	**2,040**	**7,890**

Data Source: 2012-2016 CHAS

For those cost overburdened by more than 30%, renters are more likely to be highly affected; renter-occupied households are much likelier to be cost overburdened than owners.

Cost Overburdened Greater Than 50% – Cumberland County

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,875	2,020	675	**5,570**	855	500	455	**1,810**
Large Related	570	185	120	**875**	195	40	90	**325**
Elderly	635	600	120	**1,355**	700	430	280	**1,410**
Other	1,730	1,200	595	**3,525**	665	235	400	**1,300**
Total need by income	**5,810**	**4,005**	**1,510**	**11,325**	**2,415**	**1,205**	**1,225**	**4,845**

Data Source: 2012-2016 CHAS

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For those who are cost overburdened by more than 50%, renters making up are more highly affected than owners based on the total number of households.

Overcrowding Conditions – Cumberland County

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	225	150	320	140	**835**	95	40	54	35	**224**
Multiple, unrelated family households	45	85	25	35	**190**	0	59	129	0	**188**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	0	0	0	0	**0**	0	10	0	0	**10**
Total need by income	**270**	**235**	**345**	**175**	**1,025**	**165**	**60**	**164**	**100**	**489**

Data Source: 2012-2016 CHAS

The following three (3) maps illustrate census tracts where there is overcrowding for Extremely Low, Very Low, and Low Income Households.

- Percentage Extremely Low Income Households with Overcrowding
- Percentage Very Low Income Households with Overcrowding
- Percentage Low Income Households with Overcrowding

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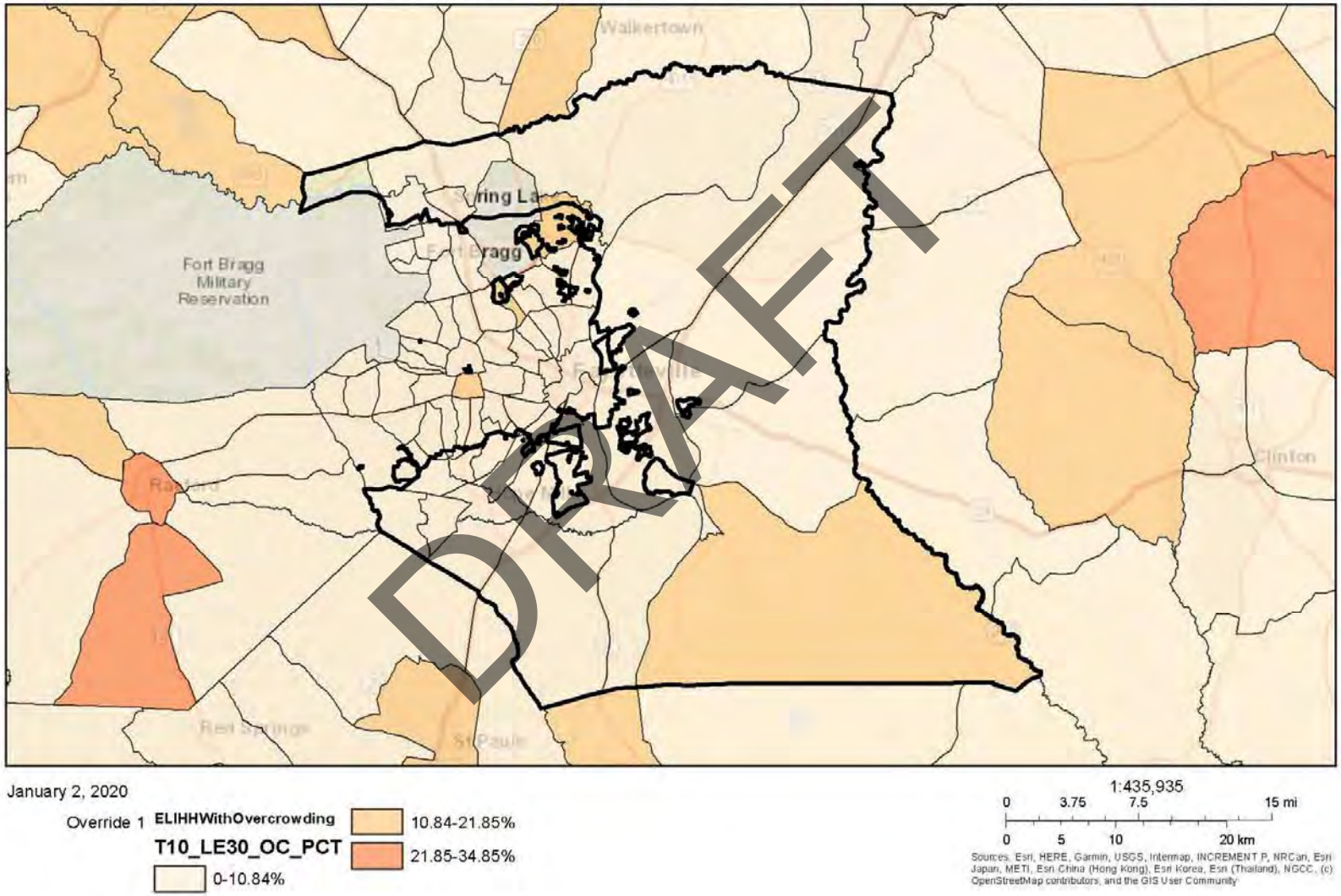
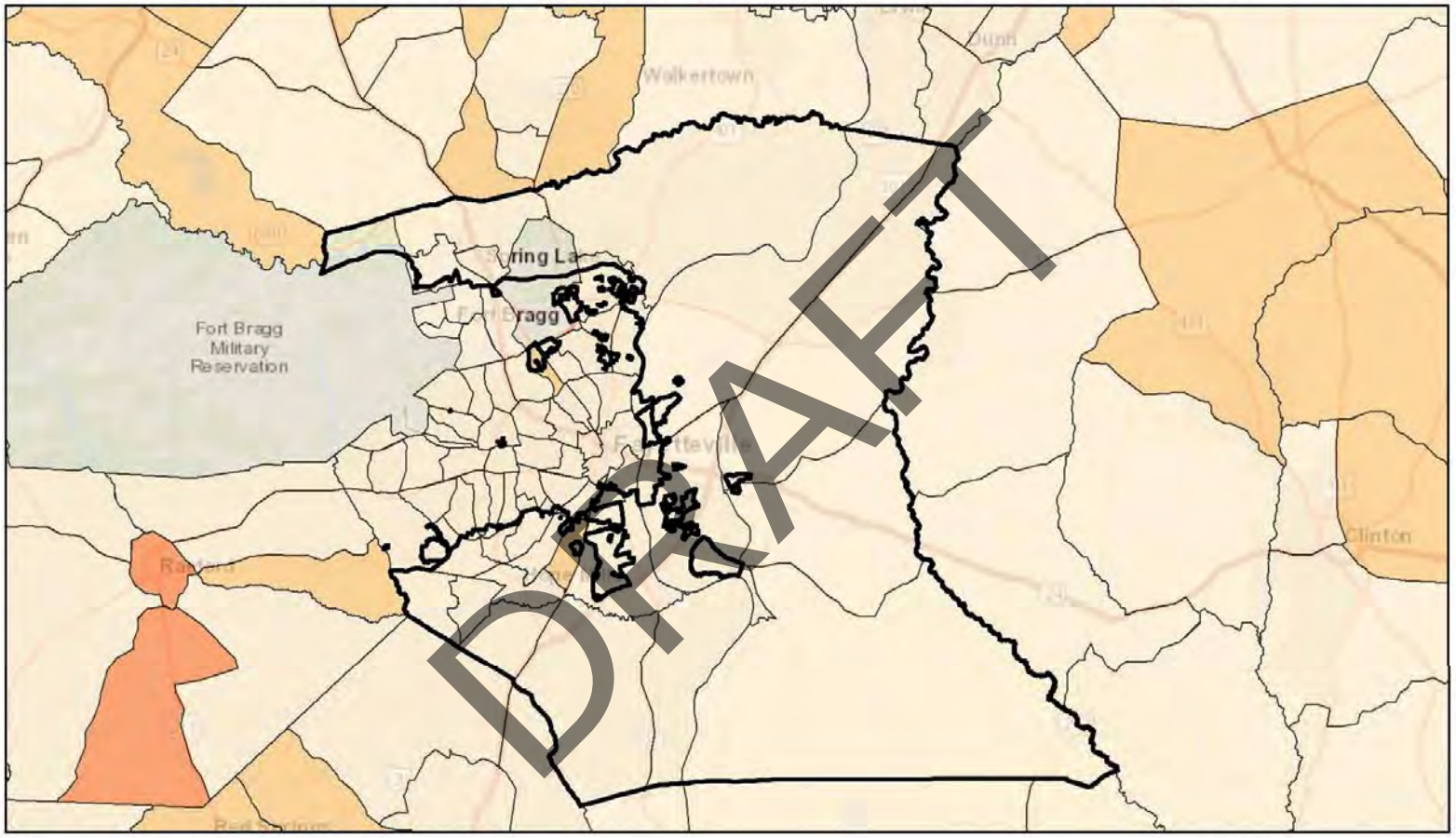
% Extremely Low Income Households with Overcrowding - Cumberland County, NC



% Low Income Households with Overcrowding - Cumberland County, NC



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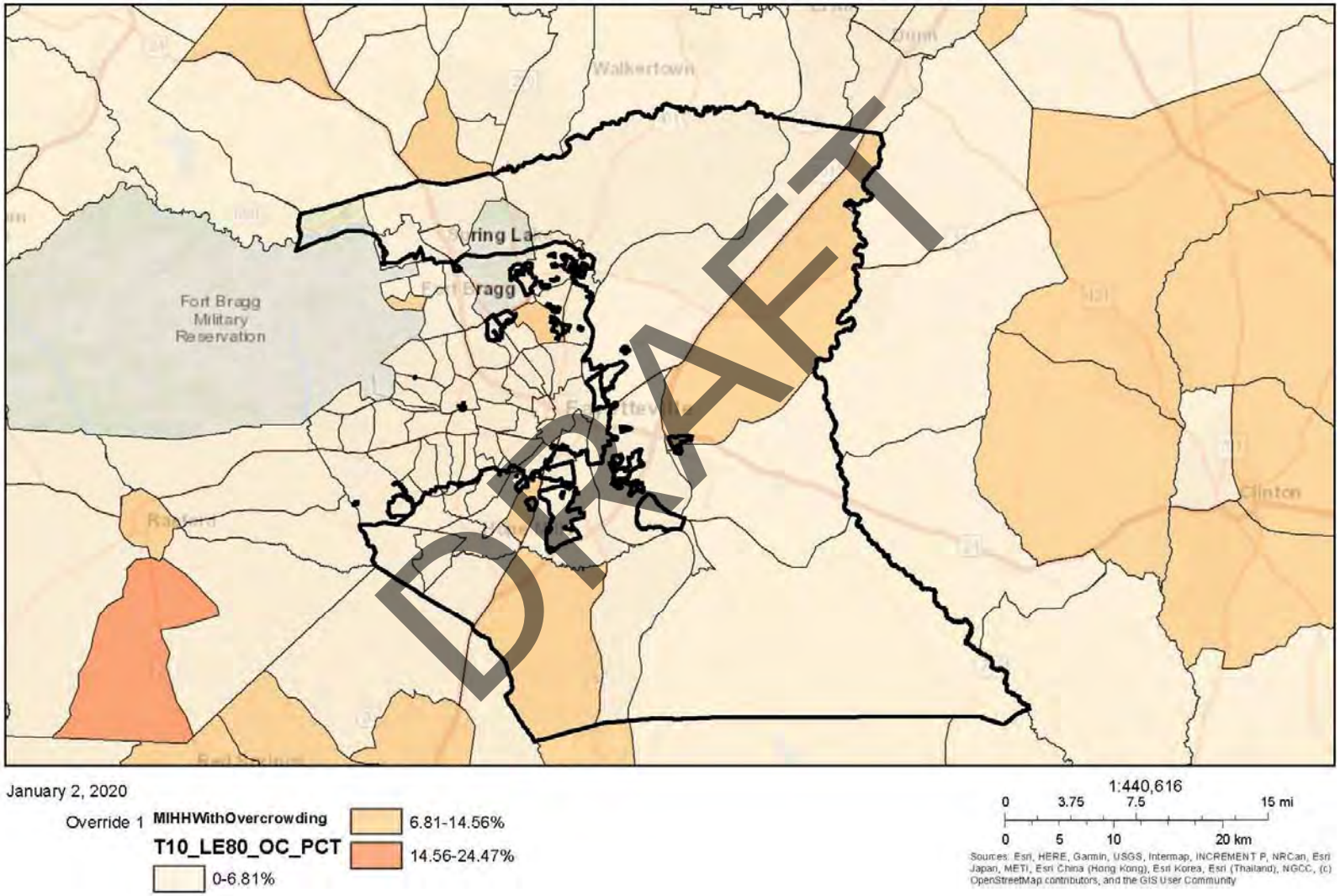
% Moderate Income Households with Overcrowding - Cumberland County, NC



H. Cost Overburden

Overall, there is a shortage of decent, safe, sound, and affordable housing in Cumberland County. Many of the City's and County's lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted for the City of Fayetteville: 6,275 White households were cost overburdened by 30% to 50%, and 23,985 White households were severely cost over burdened by greater than 50%; 7,230 Black/African American households were cost overburdened by 30% to 50%, and 18,370 Black/African American households were severely cost overburdened by greater than 50%; and lastly, 1,860 Hispanic households were cost overburdened by 30% to 50%, and 4,095 Hispanic households were severely cost overburdened by greater than 50%.

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Housing Cost Burden – Fayetteville City

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	**49,290**	**16,240**	**11,855**	**1,490**
White	23,985	6,275	3,315	535
Black / African American	18,370	7,230	6,690	560
Asian	1,305	300	265	10
American Indian, Alaska Native	330	105	110	25
Pacific Islander	110	35	0	0
Hispanic	4,095	1,860	1,130	275

Data Source: 2012-2016 CHAS

In Cumberland County, 10,225 White households were cost overburdened by 30% to 50%, and 42,560 White households were severely cost over burdened by greater than 50%; 9,810 Black/African American households were cost overburdened by 30% to 50%, and 25,580 Black/African American households were severely cost overburdened by greater than 50%; and lastly, 2,650 Hispanic households were cost overburdened by 30% to 50%,

and 6,260 Hispanic households were severely cost overburdened by greater than 50%.

Housing Cost Burden – Cumberland County

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	**78,835**	**24,035**	**17,930**	**2,375**
White	795	245	280	70
Black / African American	1,680	425	335	20
Asian	25,580	9,810	8,840	805
American Indian, Alaska Native	6,260	2,650	1,670	325
Pacific Islander	1,775	595	555	130
Hispanic	185	85	30	0

Data Source: 2012-2016 CHAS

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Overall throughout both jurisdictions, black/African American households were disproportionately affected by a housing cost overburdened in Cumberland County, North Carolina. Black/African American households were considered to be severely cost overburdened, where they were 49.3% of the total cases of households that were considered cost overburdened by greater than 50%. This is more than 7.3 percentage points higher than the 42.0% of the total number of households that the Black/African American category comprises.

A total of 10,225 White households were considered cost overburdened by between 30% and 50%, which is 42.5% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is below the 45.8% of the total number of households which the White category comprises. Additionally, a total of 2,650 Hispanic households were considered cost overburdened by between 30% and 50%, which is 11% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is comparable to the 11.6% of the total number of households that the Hispanic category comprises. A total of 9,810 Black/African American households were considered cost overburdened by between 30% and 50%, which is 40.8% of the total cases of households that

were considered cost overburdened by between 30% and 50%. This number is slightly above the 42.0% of the total number of households that the Black/African American category comprises. No other racial or ethnic group has a disproportionately higher instance of being cost overburdened than its household population.

The following four (4) maps illustrate census tracts where there are housing cost overburdens for all households, Extremely Low, Very Low, and Low Income Households.

- Housing Cost Burden
- Percentage Extremely Low Income Households with Severe Cost Burden
- Percentage Very Low Income Households with Severe Cost Burden
- Percentage Low Income Households with Severe Cost Burden

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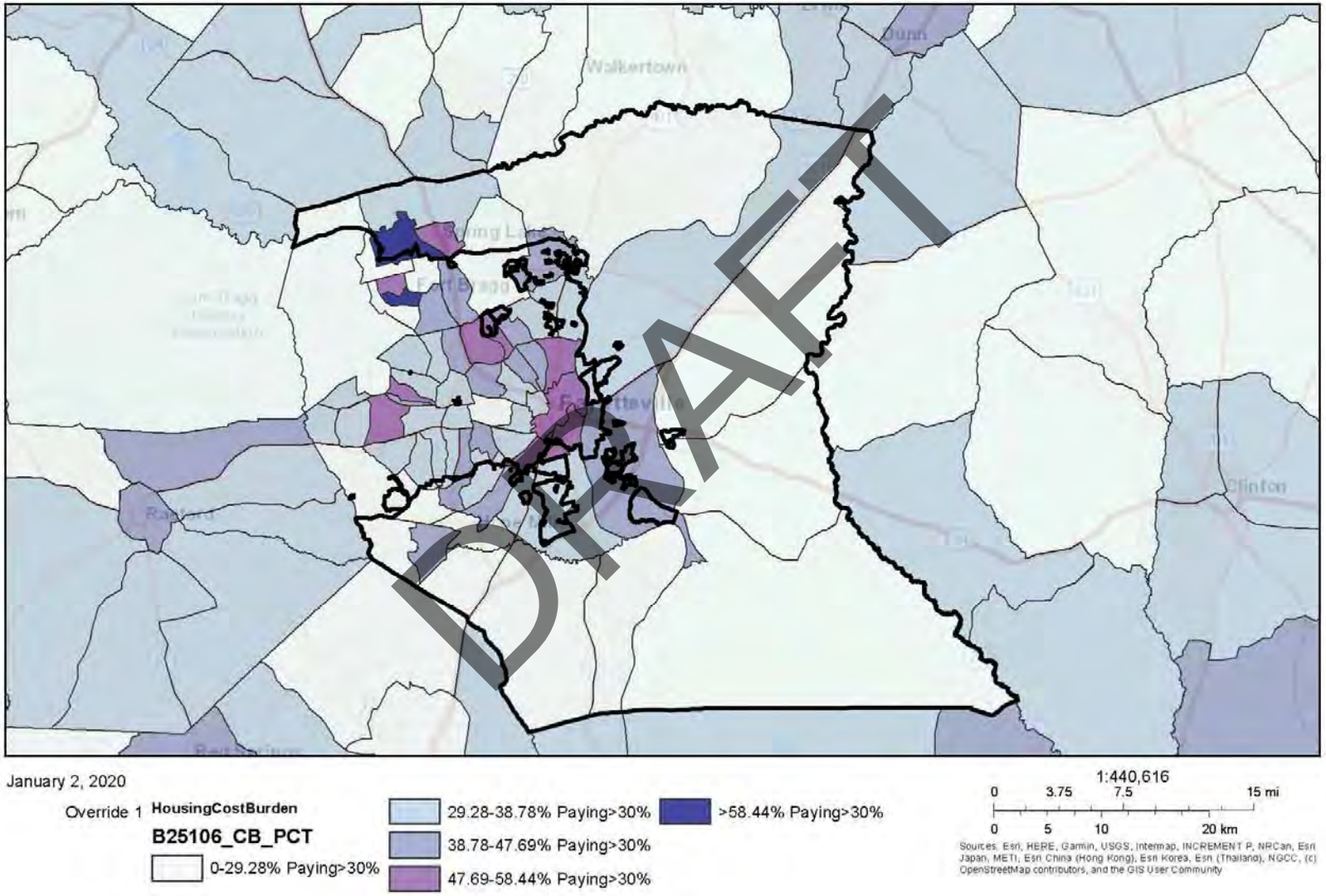
Housing Cost Burden - Cumberland County, NC



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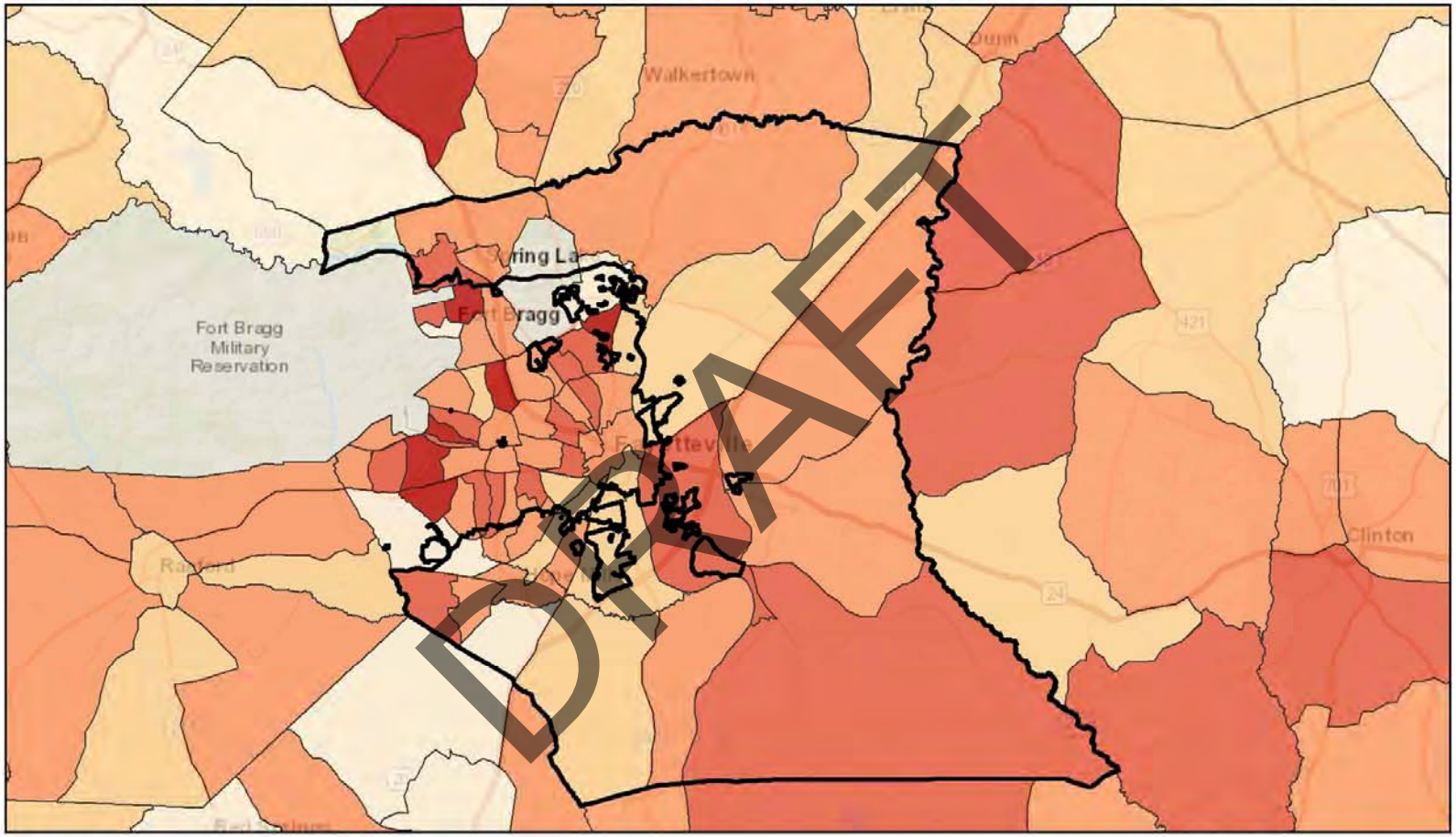
% Extremely Low Income Households with Severe Housing Cost Burden - Cumberland County, NC



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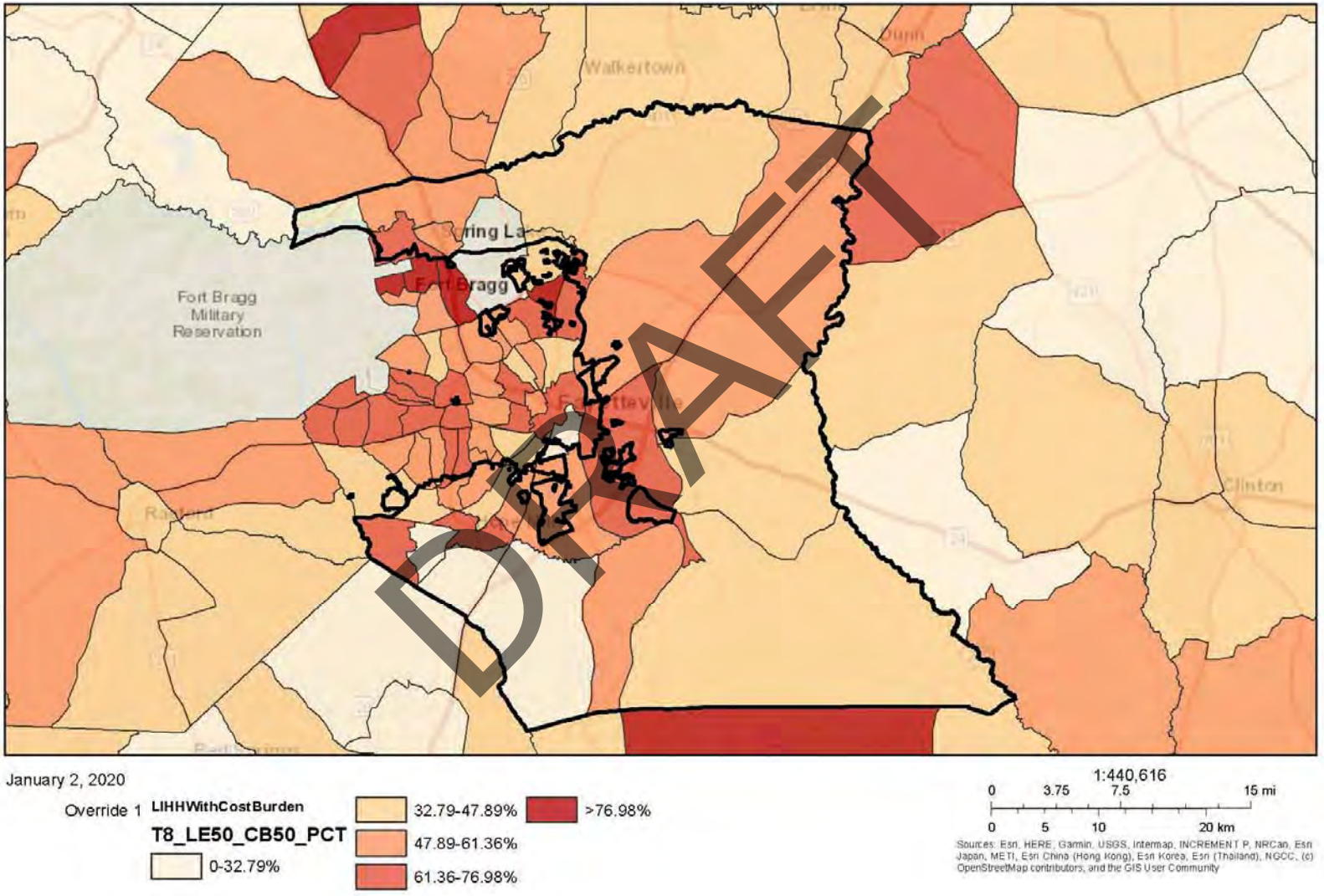
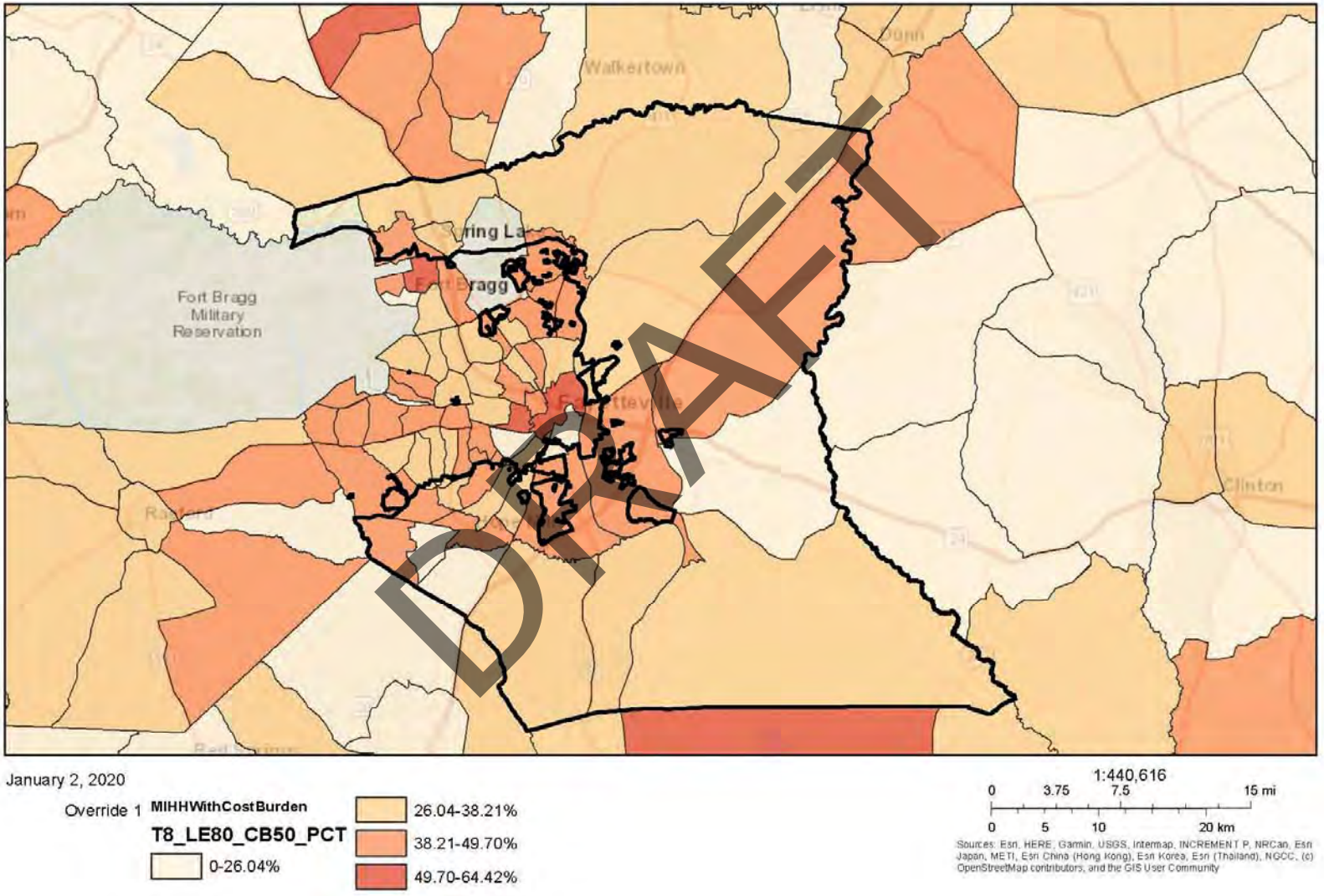
% Low Income Households with Severe Housing Cost Burden - Cumberland County, NC



% Moderate Income Households with Severe Housing Cost Burden - Cumberland County, NC



A total of 8,840 White households were considered severely cost overburdened by greater than 50%, which is 49.3% of the total cases of households that were considered cost overburdened by greater than 50%. This number is below the 45.8% of the total number of households that the White category comprises. A total of 1,670 Hispanic households were considered severely cost overburdened by greater than 50%, which is 9.3% of the total number of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 11.6% of the total number of households that the Hispanic category comprises.

I. Housing Problems

A household is considered to have a housing problem if it meets one of the four (4) HUD designated housing problems; The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; has more than one person per room; and is cost burden greater than 30%. The following tables illustrate the disproportionate needs in the City of Fayetteville and Cumberland County:

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0%-30% of Area Median Income (Extremely Low Income) – City of Fayetteville

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**6,450**	**728**	**1,480**
White	1,580	215	525
Black / African American	3,925	485	560
Asian	155	0	10
American Indian, Alaska Native	45	14	25
Pacific Islander	0	0	0
Hispanic	550	10	275

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

0%-30% of Area Median Income (Extremely Low Income) – Cumberland County

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**9,745**	**1,184**	**2,345**
White	3,055	445	995
Black / African American	5,125	640	805
Asian	225	0	20
American Indian, Alaska Native	175	24	70
Pacific Islander	15	0	0
Hispanic	825	60	325

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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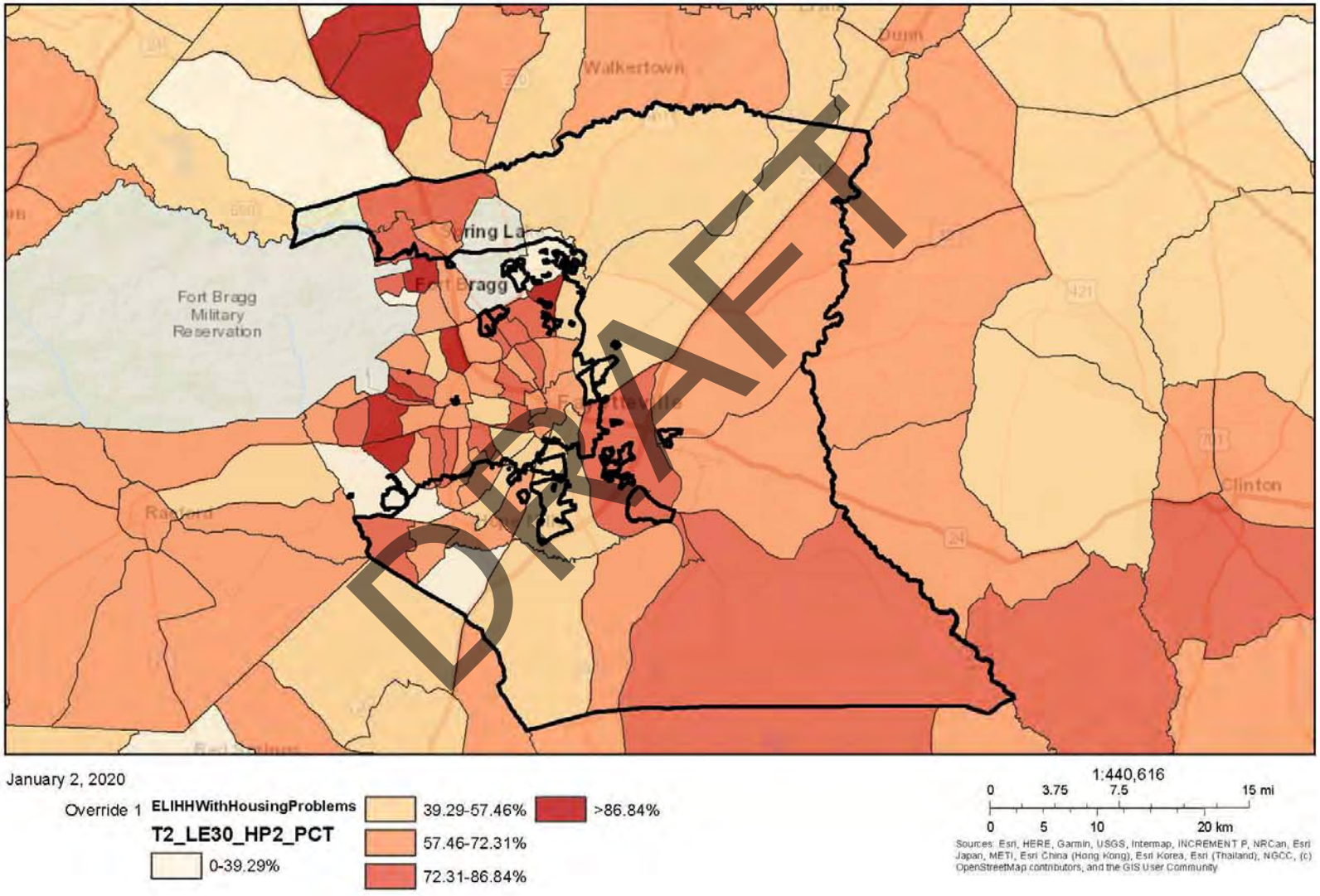
The following map illustrates the location by Census Tract where extremely low-income households have severe housing problems.

% Extremely Low Income Households with Any of 4 Severe Housing Problems - Cumberland County, NC



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30%-50% of Area
Median Income (Low-Income) – City of Fayetteville

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**6,175**	**1,239**	**0**
White	1,530	440	0
Black / African American	3,505	650	0
Asian	75	34	0
American Indian, Alaska Native	60	0	0
Pacific Islander	15	0	0
Hispanic	760	440	0

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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30%-50% of Area
Median Income (Low-Income) – Cumberland County

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**9,745**	**2,434**	**0**
White	3,325	1,110	0
Black / African American	4,680	985	0
Asian	85	70	0
American Indian, Alaska Native	115	35	0
Pacific Islander	30	0	0
Hispanic	1,155	180	0

Data Source: 2012-2016 CHAS

**The four housing problems are:*

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where very low-income households have severe housing problems.

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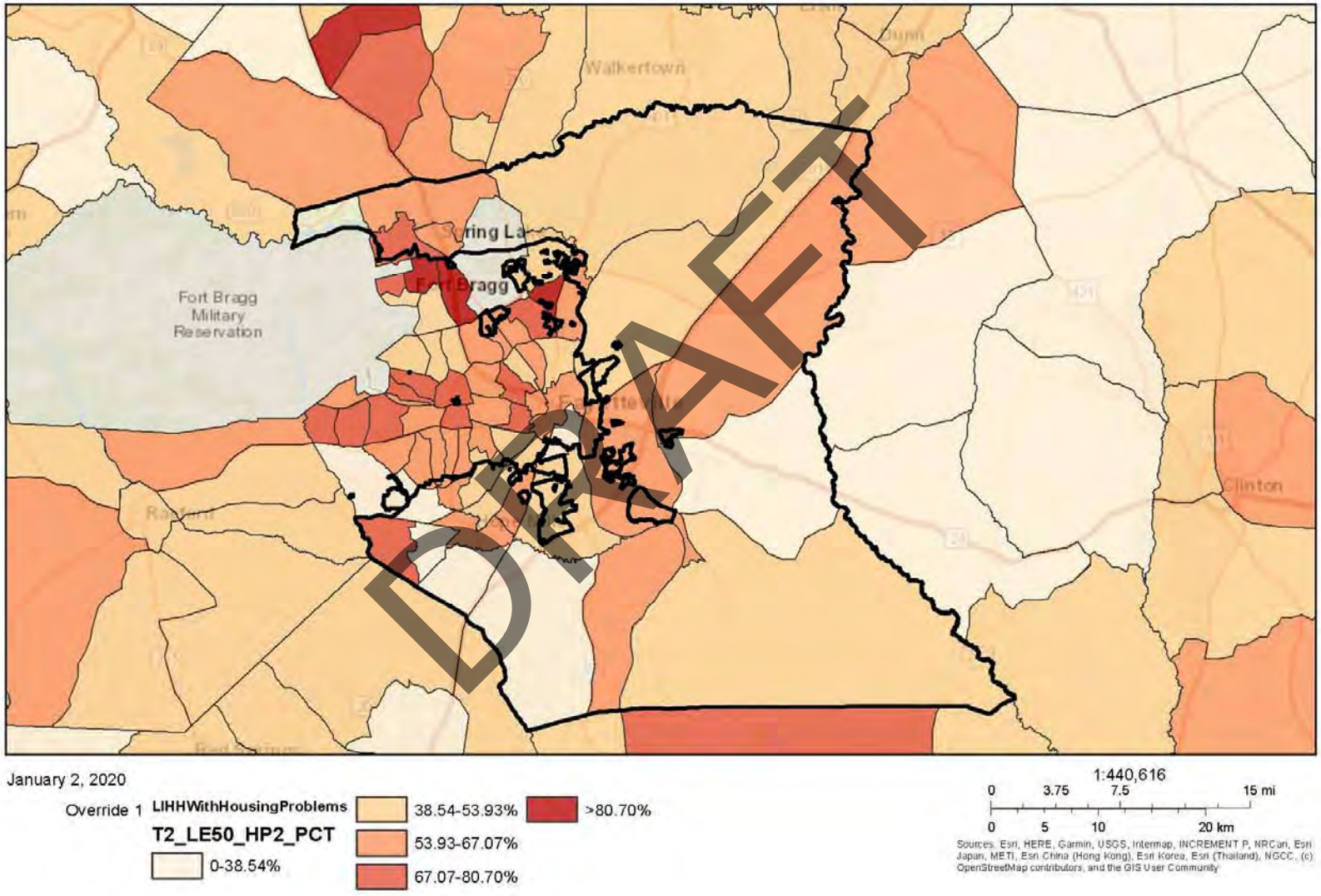
% Low Income Households with Any of 4 Severe Housing Problems - Cumberland County, NC



50%-80% of Area Median Income – City of Fayetteville

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**9,265**	**4,440**	**0**
White	3,525	1,815	0
Black / African American	4,170	1,900	0
Asian	210	185	0
American Indian, Alaska Native	65	60	0
Pacific Islander	20	10	0
Hispanic	1,025	410	0

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income – Cumberland County

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**13,310**	**7,620**	**0**
White	5,375	3,665	0
Black / African American	5,575	2,785	0
Asian	280	190	0
American Indian, Alaska Native	160	110	0
Pacific Islander	45	35	0
Hispanic	1,550	725	0

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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The following map illustrates the location by Census Tract where low-income households have severe housing problems.

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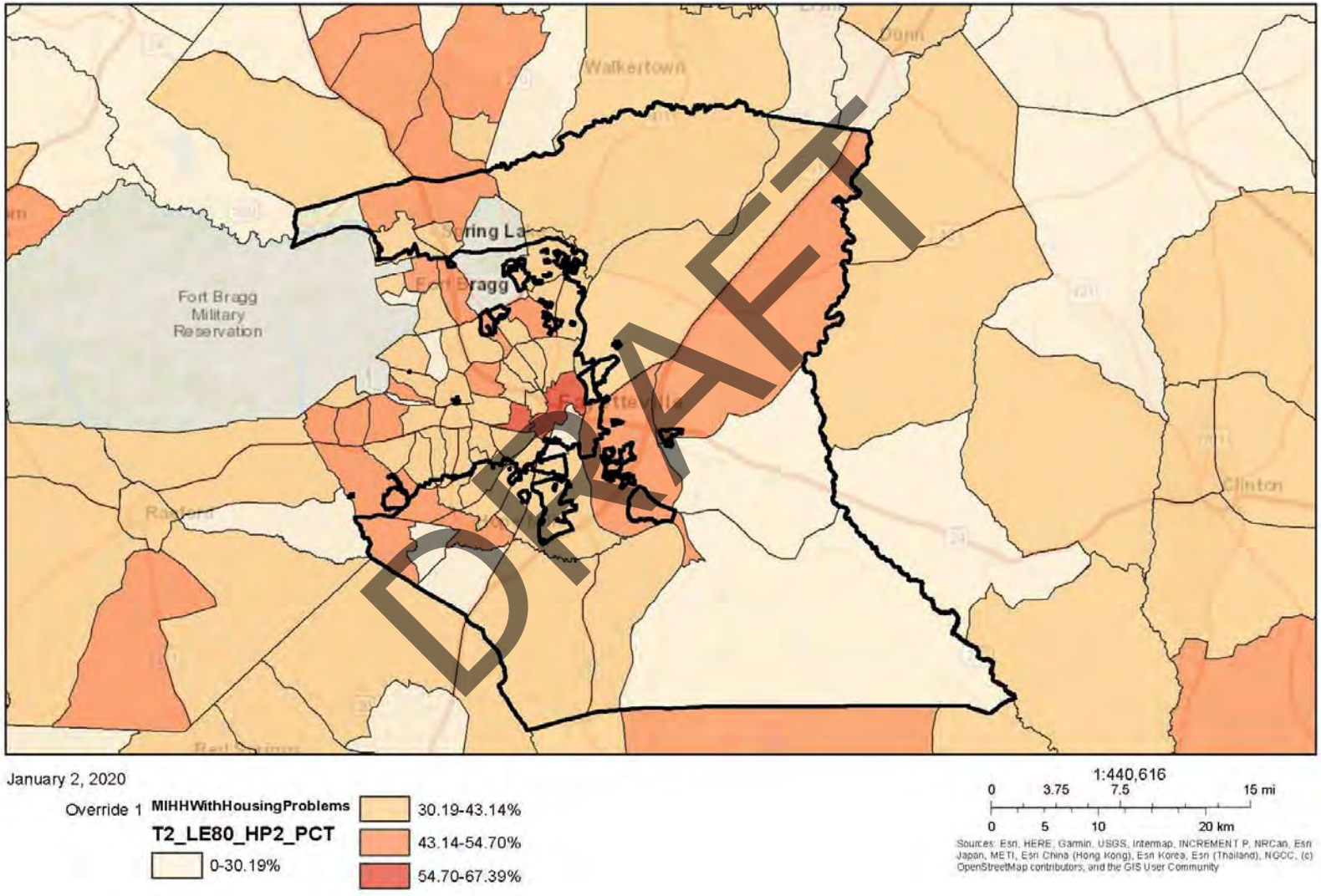
% Moderate Income Households with Any of 4 Severe Housing Problems - Cumberland County, NC



80%-100% of Area Median Income – City of Fayetteville

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**3,620**	**4,900**	**0**
White	1,745	2,185	0
Black / African American	1,430	1,790	0
Asian	30	165	0
American Indian, Alaska Native	20	105	0
Pacific Islander	0	0	0
Hispanic	315	575	0

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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80%-100% of Area Median Income – Cumberland County

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	**5,515**	**7,805**	**0**
White	2,845	3,955	0
Black / African American	1,945	2,570	0
Asian	85	240	0
American Indian, Alaska Native	55	150	0
Pacific Islander	30	0	0
Hispanic	445	795	0

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

The racial composition of households in Cumberland County, according to the 2013-2017 American Community Survey, was 51.9% White; 35.9% African American/Black; 2.3% Asian; 1.0% American Indian and Alaska Native; and 0.3% Native Hawaiian or Pacific Islander. 9.5% of the population identified as Hispanic or Latino. At all Median Income Categories except for 50-80% AMI, the African American/Black ethnic group has a disproportionate need in terms of severe housing problems. The disproportionate need is 52.9% at 0-30% AMI, 49.5% at 50-30% AMI, and 36.5% at 80-100% AMI. There were no other racial or ethnic groups that disproportionately are experiencing severe housing problems.

J. Disabled Households

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Disabled Population – City of Fayetteville

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in Fayetteville City. The total population of disabled persons in Fayetteville is estimated to be 30,791 persons which represents 15.4 percent of the total population of the City. The two largest disability types are ambulatory and independent difficulties.

Disabled Persons in Fayetteville City

Disability Status of the Civilian Non-Institutional Population	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	175,935	-	184,848	-
Total Population with a disability	24,288	13.8%	30,791	16.7%
Population under 5 years	**158**	**0.9%**	**169**	**1.1%**
With a hearing difficulty	50	0.3%	85	0.6%
With a vision difficulty	108	0.6%	84	0.5%
Population 5 to 17 years	**2,126**	**7.9%**	**3,101**	**9.3%**
With a hearing difficulty	222	0.7%	227	0.7%
With a vision difficulty	209	0.6%	387	1.2%
With a cognitive difficulty	1,724	5.1%	2,377	7.1%
With an ambulatory difficulty	297	0.9%	360	1.1%
With a self-care difficulty	196	0.6%	360	1.1%
Population 18 to 64 years	**14,316**	**13.5%**	**17,415**	**14.9%**
With a hearing difficulty	2,734	2.6%	3,453	3.1%
With a vision difficulty	2,979	2.8%	3,590	3.2%

With a cognitive difficulty	5,707	5.4%	7,999	7.1%
With an ambulatory difficulty	8,044	7.6%	9,098	8.1%
With a self-care difficulty	2,738	2.6%	3,392	3.0%
With an independent living difficulty	5,138	4.8%	5,721	5.1%
Population 65 years and over	**7,688**	**41.4%**	**10,106**	**45.7%**
With a hearing difficulty	2,583	13.9%	3,791	16.5%
With a vision difficulty	1,337	7.2%	2,325	10.1%
With a cognitive difficulty	2,151	11.6%	2,632	11.5%
With an ambulatory difficulty	5,676	30.6%	6,753	29.5%
With a self-care difficulty	1,930	10.4%	2,523	11.0%
With an independent living difficulty	3,250	18.9%	4,216	18.4%
SEX				
Male	11,040	14.3%	15,104	18.0%
Female	13,248	13.4%	15,687	15.6%
HISPANIC/LATINO ORIGIN				
White alone	10,803	14.0%	12,913	16.1%
Black or African American alone	11,661	15.2%	14,977	18.3%
American Indian and Alaska Native alone	260	20.8%	349	21.6%
Asian alone	450	8.6%	518	9.5%
Native Hawaiian and Other Pacific Islander alone	31	4.2%	59	9.6%
Some other race alone	198	4.4%	537	11.9%
Two or more races	885	8.6%	1,438	13.5%
White alone, not Hispanic or Latino	10,102	14.6%	11,490	16.8%
Hispanic or Latino (of any race)	1,073	6.5%	2,567	12.2%

Source: 2008-2012 and 2013-2017 American Community Survey

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Disabled Population – Cumberland County

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in Cumberland County. The total population of disabled persons in Cumberland County is estimated to be 49,950 persons which represents 16.6 percent of the total population of Cumberland County. The two largest disability types are ambulatory and independent living difficulties.

Disabled Persons in Cumberland County

Disability Status of the Civilian Non-Institutional Population	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	288,688	-	300,902	-
Total Population with a disability	40,421	14.0%	49,950	16.6%
Population under 5 years	**173**	**0.7%**	**362**	**1.4%**
With a hearing difficulty	65	0.2%	213	0.8%
With a vision difficulty	108	0.4%	216	0.8%
Population 5 to 17 years	**3,550**	**6.1%**	**5,262**	**9.2%**
With a hearing difficulty	319	0.5%	483	0.8%
With a vision difficulty	353	0.6%	766	1.3%
With a cognitive difficulty	2,889	4.9%	4,062	7.1%
With an ambulatory difficulty	451	0.8%	688	1.2%
With a self-care difficulty	346	0.6%	723	1.3%
Population 18 to 64 years	**24,198**	**13.9%**	**28,275**	**14.7%**
With a hearing difficulty	4,705	2.7%	5,560	3.1%
With a vision difficulty	4,585	2.6%	5,920	3.2%
With a cognitive difficulty	9,516	5.5%	12,843	7.0%
With an ambulatory difficulty	13,620	7.8%	14,977	8.2%
With a self-care difficulty	4,478	2.6%	5,499	3.0%
With an independent living difficulty	8,468	4.9%	9,661	5.3%
Population 65 years and over	**12,500**	**42.3%**	**16,051**	**47.1%**
With a hearing difficulty	4,320	14.6%	5,858	16.4%
With a vision difficulty	2,344	7.9%	3,425	9.6%
With a cognitive difficulty	3,427	11.6%	4,376	12.2%
With an ambulatory difficulty	9,197	31.1%	10,888	30.5%
With a self-care difficulty	3,285	11.1%	3,766	10.5%
With an independent living difficulty	5,417	18.3%	6,355	17.8%
SEX				
Male	18,413	14.3%	24,595	17.8%
Female	22,008	13.8%	25,355	15.6%
HISPANIC/LATINO ORIGIN				
White alone	21,039	14.4%	24,809	16.7%
Black or African American alone	16,206	15.0%	20,423	17.7%
American Indian and Alaska Native alone	579	18.7%	1,070	24.9%
Asian alone	586	8.8%	688	9.2%
Native Hawaiian and Other Pacific Islander alone	31	3.3%	111	14.1%
Some other race alone	435	5.4%	827	12.2%
Two or more races	1,545	9.3%	2,022	11.5%

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White alone, not Hispanic or Latino	19,873	15.0%	22,406	17.2%
Hispanic or Latino (of any race)	1,961	7.5%	4,225	13.1%

Source: 2008-2012 and 2013-2017 American Community Survey

The City of Fayetteville and Cumberland County recognize the need for accessible and visitable housing units. The City and County ensure that multi-family housing developments which are rehabilitated or constructed using Federal funds, must comply with ADA requirements, and encourage visitable units beyond minimum requirements.

Another issue is a lack of affordable housing that is accessible. Public housing often has higher proportions of disabled residents and with most public housing consisting of 1-bedroom units, it is difficult for families and larger households with disabled members to find housing that is both accessible and affordable. The Fayetteville Metropolitan Housing Authority responds to requests for reasonable accommodations and modifications in a timely manner.

While single-family housing is generally not accessible, the Fair Housing Act requires that multifamily properties built after 1991 meet Federal accessibility standards; therefore, multifamily housing units built after 1991 should be in compliance with Federal Law and meet the minimum level of accessibility. However, as 57.2% of housing units in Cumberland County were built prior to 1990, many of these units are more likely to have narrow halls, stairs, narrow doors, and little room for ramps to entrance doors.

The City of Fayetteville and Cumberland County fund a variety of home repair and rehabilitation programs for both renter- and owner-occupied housing. These programs can be used to make accessibility improvements to the existing housing stock.

Government and Housing Authority Facilities:

The City of Fayetteville and Cumberland County do not discriminate on the basis of disability for access to, nor operations of its programs, services, or activities. If a resident of the City of Fayetteville or Cumberland County requires additional assistance to gain access to County facilities, he or she may contact the designated ADA Coordinator, Dr. Anthony W. Wade. The Coordinator can be contacted at: Festival Park Plaza, 225 Ray Street, Fayetteville, NC 28301; (phone) 910-433-1696. The ADA Coordinator for the

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City of Fayetteville has jurisdiction throughout all of Cumberland County in partnership with the Fayetteville Cumberland Human Relations Commission.

Fayetteville Metropolitan Housing Authority may provide reasonable modifications upon request. When a tenant requests an accommodation, the Housing Authority may verify the disability only to the extent necessary to ensure the applicants are entitled to the preference. However, the Housing Authority will not ask what the disability is. Once modifications are deemed reasonable, the work will be coordinated with the tenant; if the modifications are tantamount to those required for a fully accessible unit, the tenant/applicant will be placed on an Authority transfer/waiting list for the next available unit with the features requested, if so desired.

Public Infrastructure:

The City of Fayetteville and Cumberland County each administer funds through the Federal Community Development Block Grant (CDBG) program to benefit low- and moderate-income areas. Both the City of Fayetteville and Cumberland County fund accessibility improvement projects through their housing activities.

Schools:

The North Carolina Department of Public Instruction's Exceptional Children Division assures that students with disabilities and those who are academically or intellectually gifted, will develop mentally, physically, emotionally, and vocationally through the provision of appropriate individualized education. The Department provides information and training to assist in the implementation of Section 504 plans in area schools. School districts are responsible for the provision of special education and related services for every student with a disability under the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1973. Section 504 complaints can be made through the US Department of Education.

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III. Review/Update to Original Plan

In FY 2015, the City of Fayetteville and Cumberland County, NC, completed a joint Analysis of Impediments to Fair Housing Choice (AI) to evaluate the housing conditions in the City and the County. The analysis was intended to focus on both City and the County to serve as a basis for fair housing planning for the City's and County's Federal Entitlement programs. The following paragraphs restate the identified impediments from the 2015 Analysis of Impediments to Fair Housing Choice and summarize the progress made on each for the time period of 2015 through 2019.

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A. Summary of 2015 Impediments

- **Impediment # 1: Fair Housing Cases & Resolution:**

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

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

Accomplishments:

The City of Fayetteville and Cumberland County have taken the following actions to reach this goal:

- The City of Fayetteville and Cumberland County partner closely with the Fayetteville-Cumberland Human Relations Department.
- The Fayetteville-Cumberland Human Relations Department conducts annual trainings with a variety of organizations, including

Fayetteville Economic & Community Development, Cumberland County Development, Residential Employment Services, and Catholic Charities. Trainings include a variety of topics including cultural competency and accommodations for individuals with Alzheimer's' and Autism.

- In 2016, the Fayetteville-Cumberland Human Relations Department conducted 3 fair housing trainings, with one training in Spanish.
- In 2017, the Fayetteville-Cumberland Human Relations Department conducted 10 fair housing trainings, with one training in Spanish. Additionally, the department filed 6 cases in 2017.
- In 2018, the Fayetteville-Cumberland Human Relations Department conducted 14 fair housing trainings, with trainings in: Spanish; French; and ASL for the Deaf & Hard of Hearing. Trainings were conducted for the Autism Society and Veteran SVC Providers. One training was bi-lingual. Additionally, the department filed 10 cases in 2018.
- In 2019, the Fayetteville-Cumberland Human Relations Department conducted 13 fair housing trainings, with one training in Spanish, one bi-lingual training, one training targeted to housing providers, and one training targeted to the LGBTQ population. One tester training was conducted. Additionally, the department filed 9 cases in 2019.

- **Impediment # 2: Zoning & Public Policies:**

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

Recommendations: It is recommended that emphasis on inclusionary zoning be replaced with emphasis on subsidized new housing to replace the districts' older housing stock. Due to the relative high-cost of building as compared to return on investment, newer subsidized housing would depend on grants, tax relief, accessible loans, and developer incentive. Recommend evaluation of lending availability to the area's prospective

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

Accomplishments:

The City of Fayetteville and Cumberland County have taken the following actions to reach this goal:

- The City of Fayetteville and Cumberland County have updated their zoning ordinances to address a unified vision for growth.
- The City of Fayetteville updated its zoning ordinance in 2013 to incentivize higher density development with density bonuses.

- **Impediment # 3: Public Transportation:**

Conclusion: The City of Fayetteville transit plans to add fixed route service on Sundays. Sundays are not currently served by fixed route buses, however these services are needed to provide transportation to employment. Cumberland County offers limited transportation services through grants. The County has severe budget limitations that prevent it from operating sufficient transportation options. It is believed the Counties' programs do not satisfy the needs of the public who live beyond the City limits. In all cases, County residents must make advanced arrangements for transportation services. All transportation services in the County jurisdiction are provided through grants and have financial limitations that impact service availability.

Recommendations: Greater frequency – more routes with 30-minute headways; Later evening service to provide transportation from employment; Sunday service to provide transportation to and from employment; Flexibility to respond to emerging mobility needs; Service into unserved areas of the County with higher density to provide transportation to and from employment; Development of a 5 & 10 year comprehensive plan to provide adequate and effective transportation for employment and medical purposes; and a partnership with the City of Fayetteville to extend City fixed route services to densely populated areas of the County within 2 miles of a City limit.

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Accomplishments:

The City of Fayetteville and Cumberland County have taken the following actions to reach this goal:

- Fayetteville Area System Transit (FAST) has added Sunday hours to its bus service on select fixed routes.
- Fayetteville Area System Transit (FAST) has added routes as early as 5:30am and as late as 10:30pm to assist workers on select fixed routes.

- **Impediment # 4: Lending Practices:**

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

Recommendations: The City and County's Human Relations Commission, along with the North Carolina Human Relations Commission and the Reinvestment Partners Group, may consider distributing additional educational materials to affected groups, in this case minority citizens and low-income citizens. While it is unclear if predatory lending is a concern, information regarding predatory loans would also help vulnerable groups to achieve fair lending for their home purchase.

Accomplishments:

The City of Fayetteville and Cumberland County have taken the following actions to reach this goal:

- The Fayetteville-Cumberland County Human Relations Commission hold annual fair housing trainings and conduct education and outreach on housing discrimination in the region.
- The Fayetteville-Cumberland County Human Relations Commission partnered with the NC Fair Housing Project, the Fayetteville Fair Housing Board, the NC Housing Coalition,

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Cumberland County Veterans Services, and the Cumberland County Department of Social Services to hold a listening session for area Veterans.

- In 2018, the Fayetteville-Cumberland County Human Relations Commission attended the Housing and Resource Community Fair to distribute materials on housing resources available to the public.
- In 2019, the Fayetteville-Cumberland County Human Relations Commission conducted a fair housing training for the beauty, hair care, and cosmetology community.
- In 2018 and 2019, Fayetteville-Cumberland County Human Relations Commission was present at the Dogwood Festival with outreach materials.

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IV. Impediments to Fair Housing 2020

This AI was prepared jointly by the City of Fayetteville, Cumberland County, and the Fayetteville Metropolitan Housing Authority. Housing barriers affecting residents of Fayetteville and Cumberland County were identified through a robust citizen participation process, which included a series of two (2) public meetings, twenty-two (22) small interview sessions (with City and County Departments, Housing Authority Staff, housing residents, and local housing groups), and 170 completed resident surveys.

A. Fair Housing Complaints

1. Fayetteville-Cumberland Human Relations

Fayetteville-Cumberland Human Relations
433 Hay Street
Fayetteville, North Carolina 28301
910-433-1696
https://fayettevillenc.gov/government/city-departments/human-relations

The Fayetteville-Cumberland Human Relations addresses ADA Compliance and Fair Housing Issues in Fayetteville and Cumberland County. Through the support of the Fayetteville Fair Housing Board and Fayetteville-Cumberland Human Relations Commission, the Human Relations Department provides outreach to educate public and private entities on fair housing and equal employment opportunity. The Human Relations Department will counsel individuals, refer them to state and Federal agencies if a complaint is to be made, provide mediation, and conduct investigations into civil rights violations. Fayetteville-Cumberland Human Relations filed the following cases with the State of North Carolina between July 1, 2018 and June 30, 2019:

Case #	Basis	Issue(s)	City/Location	County	Date Filed
18HO2117	Familial Status	Discriminatory terms/conditions and privileges relating to a rental; Discriminatory refusal to rent; Otherwise deny or make housing available	Hope Mills	Cumberland	9/21/2018

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19HO2130	Handicap	Refusal to provide reasonable accommodations; Discrimination in terms/conditions and privileges relating to a rental	Fayetteville	Cumberland	4/3/2019
19HO2135	Handicap	Refusal to provide reasonable accommodations; Discrimination in terms/conditions and privileges relating to a rental	Fayetteville	Cumberland	4/23/2019
19HO2137	Handicap	Refusal to provide reasonable accommodations; Discrimination in terms/conditions and privileges relating to a rental	Fayetteville	Cumberland	4/30/2019
19HO2156	Race	Discriminatory in terms/conditions privileges or services and fcailities; Otherwise deny or making housing unavailable; Discriminatory acts under Section 818 (coercion, etc.)	Hope Mills	Cumberland	5/30/2019

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The Fayetteville-Cumberland Human Relations Commission partners with the Fayetteville City Council and Cumberland County Commissioners to advocate for improving human relations among diverse racial, ethnic, and religious groups.

- **Fayetteville-Cumberland Human Relations Commission**
  Dr. Anthony Wade, Director
  433 Hay Street, Fayetteville, NC 28301
  910-433-1696
  awade@ci.fay.nc.us

2. North Carolina Office of Administrative Hearings – Human Relations Commission

North Carolina
Office of Administrative Hearings
Human Relations Commission
1711 Hope Church Road
Raleigh, NC 27609
919-431-3000 (Voice)
919-431-3100 (Fax)

The North Carolina Department of Administrative Heargins - Human Relations Commission (NCHRC) is the primary educator and enforcer of North Carolina's State Laws against discrimination.

In addition to its staff members, the North Carolina Department of Administrative Hearings - Human Relations Commission has twenty-two (22) Commissioners. Eighteen (18) are appointed by the Governor with the advice and consent of the Senate, two (2) are chosen by the Speaker of the House, and two (2) are chosen by the President of the Senate Pro Tempore.

The NCHRC filed the following forty (40) cases between July 1, 2018 and June 30, 2019:

Case #	Basis	Issue(s)	County	Date Filed
18HO2114	Race, Familial Status	Discriminatory terms and conditions – Refusal to Rent	Iredell	7/31/2018
18HO2115	Handicap	Discriminatory terms and conditions – Refusal to Rent	Wake	8/31/2018
18HO2117	Familial Status	Discriminatory terms and conditions – Refusal to Rent	Cumberland	9/21/2018
18HO2118	Handicap	Discriminatory advertising, statements, and notices	Pitt	9/26/2018
18HO2116	Handicap	Refusal to provide reasonable accommodations	Mecklenburg	10/4/2018
18HO2119	Race	Discriminatory terms/conditions/ privileges relating to sale	Wake	10/30/2018
18HO2121	Handicap	Discriminatory terms/conditions/ privileges or services and facilities	Guilford	11/1/2018
18HO2120	Race, Handicap	Refusal to provide reasonable modifications	Lee	11/1/2018
18HO2123	Familial Status, Handicap, Race, Color	Refusal to provide reasonable accommodations	Wake	11/29/2018
18HO2122	Handicap	Refusal to provide reasonable accommodations	Pitt	11/29/2018

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18HO2124	Familial Status, Handicap	Refusal to provide reasonable accommodations	Alamance	12/7/2018
18HO2125	Race, Handicap	Refusal to provide reasonable accommodations	Buncombe	12/7/2018
18HO2126	Handicap	Refusal to provide reasonable accommodations	Wake	12/21/2018
18HO2127	Handicap	Refusal to provide reasonable accommodations	Catawba	12/21/2018
19HO2130	Handicap	Refusal to provide reasonable accommodations	Cumberland	4/3/2019
19HO2128	Handicap	Refusal to provide reasonable accommodations	Wilkes	4/8/2019
19HO2129	Sex, Handicap, Race	Discriminatory act under Section 818 (coercion, etc.)	Iredell	4/12/2019
19HO2135	Handicap	Refusal to provide reasonable accommodations	Cumberland	4/23/2019
19HO2133	Handicap	Refusal to provide reasonable accommodations	Robeson	4/25/2019
19HO2136	Handicap	Refusal to provide reasonable accommodations	Wake	4/25/2019
19HO2134	Race, Familial Status, Handicap	Refusal to provide reasonable accommodations	Mecklenburg	4/26/2019
19HO2137	Handicap	Refusal to provide reasonable accommodations	Cumberland	4/30/2019
19HO2138	Race, National Origin	Discriminatory in terms/conditions/privileges or sevices and facilities	New Hanover	5/7/2019
19HO2143	National Origin, Religion	Discriminatory in terms/conditions/privileges relating to sale	New Hanover	4/15/2019
19HO2144	Race	Discriminatory in terms/conditions/privileges or services and facilities	Wake	5/23/2019
19HO2142	Handicap	Refusal to provide reasonable accommodations	Johnston	5/228/2019
19HO2140	Sex, Familial Status	Discriminatory in terms/conditions/privileges or services and facilities	Stokes	5/28/2019
19HO2139	Familial Status	Discriminatory in terms/conditions/privileges or services and facilities	Avery	5/28/2019
19HO2156	Race	Discriminatory act under Section 818 (coercion, etc.)	Cumberland	5/30/2019
19HO2145	Handicap	Refusal to provide reasonable accommodations	Wake	6/3/2019

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19HO2146	Handicap	Refusal to provide reasonable accommodations	Wake	6/3/2019
19HO2147	Race, Handicap	Refusal to provide reasonable accommodations	New Hanover	6/4/2019
19HO2151	Handicap	Refusal to provide reasonable accommodations	Scotland	6/5/2019
19HO2148	Handicap, Race	Refusal to provide reasonable accommodations	Brunswick	6/10/2019
19HO2155	Handicap	Refusal to provide reasonable accommodations	Randolph	6/13/2019
19HO2160	Race	Discriminatory terms and conditions – refusal to rent	Wake	6/17/2019
19HO2154	Handicap	Refusal to provide reasonable accommodations	Wake	6/26/2019
19HO2149	Race	Discriminatory in terms/conditions/privileges or services and facilities	Union	6/26/2019
19HO2150	Sex	Refusal to provide reasonable accommodations	Herford	6/26/2019
19HO2152	Handicap	Refusal to provide reasonable accommodations	Wake	6/21/2019

Of the forty (40) cases filed, five (5) were filed in Cumberland County, making up 12.5% of all cases filed. Handicap was the most common basis for a complaint, making up 28 cases (70%) of all the cases.

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3. Fair Housing & Equal Opportunity (FHEO-HUD)

The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Federal Fair Housing Act. From January 1, 2014 to December 1, 2019, 15 fair housing complaints originated within Cumberland County. HUD-FHEO Complaints are sent to NCHRC for adjudication. Attached is a listing for all the FHEO Complaints received and the status or resolution of the complaint.

The fair housing complaints in Cumberland County that were filed with HUD are disaggregated in the following table to illustrate the most common basis of complaints. In Cumberland County, disability/

handicap (46.7%) was the most common basis for a complaint filed between July 1, 2013 and December 31, 2019, with race (20.0%) and familial status (20.0%) as the second and third most common causes for complaint, respectively. It is important to note that three (3) complaints identified a multiple basis in Cumberland County. The following table compares the frequency of each basis of complaint for the City of Fayetteville and all other areas of Cumberland County. Complaints based on disability were the most common in the City of Fayetteville, at 62.5% of all complaints and 50% of total complaints in the County respectively. Unsurprisingly, fair housing complaints were most common in the City of Fayetteville, which is the largest municipality in the County. 8 complaints were filed in Fayetteville, 1 complaint was filed in Hope Mills, and 1 complaint was filed in Spring Lake.

The following table entitled "Basis for Housing Complaints" summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between July 1, 2013 and December 31, 2019 in Cumberland County.

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Basis for Housing Complaints Between 07/01/2013 to 12/31/2019 for Cumberland County, NC

Basis	Cumberland County (not including Fayetteville)		City of Fayetteville	
	Count*	% of County Complaints	Count*	% of County Complaints
Race	0	**0.0%**	3	**23.1%**
Disability	1	**33.3%**	6	**46.2%**
Familial Status	1	**33.3%**	1	**7.7%**
National Origin	1	**33.3%**	1	**7.7%**
Retaliation	0	**0.0%**	0	**0.0%**
Sex	0	**0.0%**	0	**0.0%**
Color	0	**0.0%**	1	**7.7%**

Religion	0	**0.0%**	1	**7.7%**

Source: North Carolina Human Relations Commission

**Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints*

Based on the previous table, disability was the most common basis for a fair housing complaint in the City, though insufficient data is available in the County. This aligns with a national trend, where disability has overtaken race as the most common basis for a complaint. Disability complaints make up 53.3% of all complaints filed in the entire Cumberland County, with Race (20.0%) Familial Status (20.0%), and National Origin (20.0%) as the next most likely bases. All other complaint types were recorded in single instances.

The following table illustrates how complaints were closed. There were 15 complaints filed in Cumberland County from July 1, 2013 through December 31, 2019. However, some complaints had a multiple basis, so the following chart shows 16 complaints. Totals reflect the number of complaints with multiple bases considered. Of the 15 total complaints, four (4) complaints were closed because of "no cause" and six (6) were "conciliated/settled," and four (4) remain open. In other words, more than half (62.5%) of all complaints either lacked evidence or were easily settled.

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How Complaints Were Closed in Cumberland County, NC

	How Closed					
Basis	**No Cause**	**Charged or FHAP Caused**	**Conciliated/ Settled**	**Administrative Closure**	**Complaint Withdrawn after Resolution**	**Open**
Race	-	-	2	1	-	-
Familial Status	-	-	1	-	-	1
Disability	3	-	3	-	-	2
National Origin	1	-	-	-	1	-
Retaliation	-	-	-	-	-	-

Color	1	-	-	-	-	-
Sex	-	-	-	-	-	-
Religion	-	-	-	-	-	1
Total*	**4**	**-**	**6**	**1**	**1**	**4**

Source: North Carolina Human Relations Commission

**Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints*

The following table illustrates the dates complaints were filed in Cumberland County. The largest yearly number of complaints filed with HUD was in 2014 and 2019, which coincides with both the growth and the enhanced fair housing efforts of Fayetteville and Cumberland County.

HUD Date Filed of Complaints
Cumberland County, NC

HUD Date Filed	Cumberland County	
	Count	% of County Complaints
2014	4	26.7%
2015	2	13.3%
2016	1	6.7%
2017	0	0.0%
2018	1	6.7%
2019	7	46.7%

Source: North Carolina Human Relations Commission

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The following table entitled “HUD-FHEO Complaints” summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity and passed through to the North Carolina Human Relations Commission between July 1, 2013 and December 31, 2019 in Cumberland County.

HUD-FHEO Complaints for Cumberland County, NC

Violation City	Filing Date	Bases	Issues	Closure Reason
Fayetteville	2/24/2014	Color, Disability	Discriminatory terms and conditions, services and privileges; Failure to make a reasonable accommodation	Closed/No Cause Determination
Fayetteville	2/24/2014	Disability	Discriminatory terms and conditions, services and privileges; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Closed/No Cause Determination
Fayetteville	5/7/2014		Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.); Failure to make a reasonable accommodation	Closed/Conciliation -Settlement Successful
Spring Lake	5/22/2014	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; failure to permit reasonable modification; Failure to make reasonable accommodation	Closed/No Cause Determination
Fayetteville	3/31/2015	Race	Discriminatory acts under Section 818 (coercion, etc); Discriminatory in Terms/Conditions Privileges or Services and Facilities	Closed/No Cause Determination
Fayetteville	4/28/2015	Familial Status	Discriminatory in Terms/Conditions Privileges or Services and Facilities; otherwise deny or make housing available; discriminatory advertising statement and notices	Closed/No Cause Determination
Fayetteville	3/1/2016	Race	Discriminatory refusal to rent or negotiate for rental; Discriminatory in Terms/Conditions Privileges or Services and Facilities	Closed/No Cause Determination
Fayetteville	7/18/2017	National Origin	Discriminatory acts under Section 818 (coercion, etc); Discriminatory in Terms/Conditions Privileges or Services and Facilities	Complain withdrawn by complainant after resolution
Hope Mills	9/21/2018	Familial Status	Discriminatory in Terms/Conditions Privileges or Services and Facilities; otherwise deny or make housing available; Discriminatory Refusal to Rent	Open/Active
Fayetteville	4/3/2019	Handicap	Discrimination in Terms/Conditions and Privileges relating to a Rental; Refusal to provide reasonable accommodation	Closed/No Cause Determination
Fayetteville	4/23/2019	Handicap	Failure to Provide Reasonable Accommodations; Discriminatory in Terms/Conditions Privileges or Services and Facilities	Closed/No Cause Determination
Fayetteville	4/30/2019	Handicap	Failure to Provide Reasonable Accommodations; Discriminatory in Terms/Conditions Privileges or Services and Facilities	Closed/Conciliation /Settlement Successful

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Fayetteville	8/15/2019	Race	362 Discrimination in terms and conditions of membership	Waived to HUD – 10/15/2019
Fayetteville	9/11/2019	Handicap/ Religion	Discrimination in Terms/Conditions and Privileges relating to a Rental; Refusal to provide reasonable accommodation; discriminatory advertising statement and notices	Open/Active
Fayetteville	12/2/2019	Disability	Discrimination in Terms/Conditions; Refusal to provide reasonable accommodation	Open/Active

Source: North Carolina Human Relations Commission

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National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 organized by basis of complaint.

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HUD and FHAP Housing Complaints Nationwide

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,621	**41%**	4,605	**42%**	4,908	**45%**	4,865	**59%**
Race	2,383	**21%**	2,291	**21%**	2,154	**20%**	2,132	**26%**
Familial Status	1,051	**9%**	1,031	**9%**	882	**8%**	871	**11%**
National Origin	1,067	**9%**	898	**8%**	917	**8%**	834	**10%**
Sex	879	**8%**	915	**8%**	800	**7%**	826	**10%**
Religion	223	**2%**	225	**2%**	204	**2%**	800	**10%**
Color	146	**1%**	151	**1%**	143	**1%**	232	**3%**
Retaliation	867	**8%**	832	**8%**	785	**7%**	192	**2%**
Number of Complaints filed	**11,237**		**10,948**		**10,793**		**8,186**	

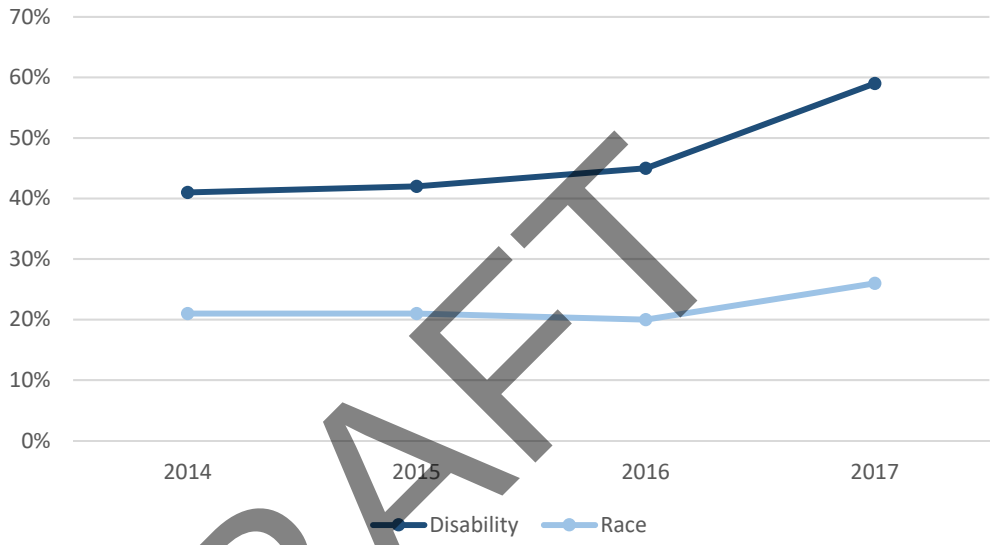
Source: HUD FY 2013-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race

was next, making up 26% of all complaints, followed by familial status at 11%. As illustrated in the next chart, disability has become the most common basis of complaint, partially at the expense of racial complaints.

Chart IV-1 – 5-Year Trends in Bases of Complaints



Source: HUD Enforcement Management Systems (HEMS), FY 2017 FHEO Annual Report

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The HUD housing complaints filed in Cumberland County were primarily based on disability and race, which are consistently the two most common causes for complaints across the nation as illustrated in the previous chart. Note: the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

4. Legal Aid NC

Legal Aid NC is a statewide nonprofit organization providing civil legal aid to low-income residents of the state, with an office in Fayetteville. The organization provides legal assistance in civil cases for people living in poverty. The Fayetteville Office of Legal Aid NC serves Cumberland, Samson, and Harland Counties. The Fayetteville office also has a grant to serve any individual aged 60 or older, regardless of

income. They serve their clients with ten (10) staff, two (2) support staff, and eight (8) attorneys. Included in their team of attorneys is one (1) veterans specialist, one (1) immigration specialist, and one (1) disaster relief specialist—though the latter works on disaster relief statewide.

Legal Aid NC has specific offices to work with landlord-tenant cases ending in evictions, and foreclosure cases. Evictions are common in the area, and a person can be forced out within 72 hours, which leads Legal Aid NC to intake at least one eviction case daily. Tenants are not allowed to withhold rent for repairs and can be evicted as a result. Predatory lending appears common in the area, leading to mortgage foreclosure. The North Carolina Finance Agency's project to assist those that fell behind on their mortgages expired in July, leading to an increase in foreclosures.

Legal Aid NC's Fayetteville Office frequently intakes cases pertaining to survivors of domestic violence. Domestic violence is common in the area, leading to 10-12 complaints a day.

- Legal Aid of NC - Fayetteville
  327 Dick Street #103
  Fayetteville, NC 28301
  866-219-5262 (Helpline)
  910-483-0400 (Local)
  910-483-2763 (FAX)
  www.legalaidnc.org

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5. Housing and Human Services Agencies

The City of Fayetteville and Cumberland County interviewed agencies offering housing and human services within the region to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, phone interviews, or through surveys:

- Fayetteville Metropolitan Housing Authority
- City of Fayetteville Fire Marshal
- Cumberland County Emergency Manager

- City of Fayetteville Planning & Zoning Department
- Fayetteville-Cumberland County Human Relations
- Cumberland County Code Enforcement
- City of Fayetteville Development Services
- Cumberland County Schools
- Cumberland County Department of Social Services
- Cumberland County Public Health Department
- Alliance Health
- Center for Economic Empowerment and Development (CEED)
- Coordinating Council on Older Adults
- Cumberland HealthNet
- Designing Station
- Endeavors
- Family Promise
- Fayetteville Area Habitat for Humanity
- Fayetteville Area Operation Inasmuch
- Genesis Grace Ministry
- Hope 4 NC
- Hope Center – True Vine Ministries
- Kingdom Community Development Corporation
- North Carolina Legal Aid
- NCWorks Career Center
- Pathways 4 Prosperity
- Salvation Army Fayetteville
- Seth's Wish
- Stedman-Wade Health Services, Inc.
- United Way of Cumberland County
- Urban Ministries
- Veterans Empowering Veterans
- Volunteers of America

Each of these agencies provided feedback on their experience with housing-related issues in the City of Fayetteville and Cumberland County. Complete summaries of meeting comments can be found in Appendix A. Below is a list of key points from each of the meetings.

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Housing Issues

- There appears to be a lack of affordable housing that is decent, safe, and sound in the City of Fayetteville and Cumberland County.
- There appears to be a lack of accessible housing in the City of Fayetteville and Cumberland County.
- Rental rates in the City of Fayetteville and Cumberland County are inflated and do not reflect the low quality of the housing supply.
- There are a number of rental housing options that are owned by overseas individuals and companies and, as a result, leave code violations unaddressed.
- There are a number of trailer parks in the City and County that are in poor condition, with owners that are either unwilling or unable to rehabilitate them.
- There are large portions of the City of Fayetteville and Cumberland County that lack infrastructure for housing, including sanitary sewers, storm sewers, and paved roads.
- There is a high demand for affordable senior housing in the area.
- Older homeowner housing is frequently converted to renter-occupied housing and allowed to deteriorate, particularly in low- and moderate-income areas.
- The Comprehensive Housing Affordability Strategy (CHAS) data through HUD shows that 47.9% of all renters are cost overburdened in the County.
- The eviction rate in Cumberland County is extremely high.
- Certain classes of people, such as ex-offenders, are unable to find housing and therefore rent from predatory landlords.
- Tax foreclosures are common in the area, and there is a need to rehabilitate them to create more affordable housing.
- Absentee landlords are common in the area due to the non-stationary nature of military employment.
- Area churches aggressively acquire property and could potentially develop affordable housing.

Social Services

- There are numerous social service programs provided in the County.

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- The number of chronical homeless individuals has increased in Cumberland County, and there is a need for supportive services to assist them.
- More social service programs are needed to assist the mentally ill, including people with addictions in the County.
- Many social service programs assist the homeless, but there is a lack of affordable housing to rapidly rehouse the least complex cases homeless individuals and families.
- Children with addictions are immediately placed into DSS care, which has put a strain on the system.
- There is a high population of youth in foster care in Cumberland County.
- With the reduction in Federal funds, there is a need for additional services to support the homeless population and those who are at-risk of becoming homeless.
- Additional services are needed to assist the non-English speaking residents who are moving into the County.
- There is a gap in housing for people with disabilities who cannot make the move to independent housing.
- Fair housing complaints are occurring with the disabled population which need to be addressed.
- There is a need for additional permanent supportive housing with wraparound services to assist the homeless population with mental health issues.
- Additional services are needed for youth who are coming out of foster care placement.
- Additional support services are needed for persons coming out of institutions including: hospitalization, correctional facilities, and mental healthcare.
- Due to Fort Bragg and the high concentration of veterans, there is a need for additional mental health care targeted to this population.

Public Policies

- The Fayetteville City Council has recently approved a new zoning ordinance to bring them into compliance with ADA and the Fair Housing Act.

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- There is a continuing need for education and training on tenant's rights and landlord's responsibilities under the Fair Housing Act.
- Municipalities in Cumberland County are still allowed to annex land, although infrastructure and services must be provided for recently annexed land shortly after annexation.
- Source of income is not a protected class in the City of Fayetteville or Cumberland County.
- Affordable housing needs to be located throughout the County and not just within the urban core.
- There is no registration requirement for businesses, and residential properties will be converted into businesses without the City or County's knowledge.
- North Carolina State Law does not allow for the creation of a rental registry.
- There is a need to provide incentives to developers and businesses to create and develop affordable housing.

Transportation

- FAST serves the City of Fayetteville and some portions of Cumberland County.
- FASTTRAC is FAST's paratransit service, and it requires 24-hour notice to pick up riders.
- There is a need for routes that connect residential areas to areas with high concentrations of jobs for low- and moderate-income residents.
- There is a need for expanded bus routes and service hours, but funding is lacking.
- Bus stops are not well-marked and lack shelters.
- All buses have wheelchair lifts for accessibility purposes.

Economic Development

- There are multiple food deserts in the City of Fayetteville and Cumberland County that affect low- and moderate-income neighborhoods and areas of minority concentration.
- There is a large number of vacant commercial properties on two of the main corridors leading to Fort Bragg: Bragg Boulevard and Murchison Road.

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- There is a wealth gap between renters and homeowners in the County.
- Wages in the area are low, and there is a large service sector with low-paying jobs that caters toward enlistees at Fort Bragg.
- There are few programs that specifically target women, minority, and veteran business owners for entrepreneurship initiatives.
- At all income levels within the City of Fayetteville, individuals that grow up in the City are predicted to earn less than their parents.
- Wages are higher for workers in Fort Bragg, leading to income disparities in contracting jobs.

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B. Public Sector

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The Local governments control land use and development through their comprehensive plans, zoning ordinances, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City's and County's policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

The City of Fayetteville

The City of Fayetteville annually receives from HUD approximately $1,589,000 in CDBG funds. The City allocates its funds to housing construction, housing rehabilitation, operations for homeless shelters, public facilities, administration, and public services.

In particular, the City proposed to allocate FY 2020 CDBG funds as outlined in the following table to affirmatively further fair housing. The City of Fayetteville anticipates a reduction in the annual CDBG allocation in the coming years as a result of further cuts in the Federal budget.

FY 2020 CDBG Allocation for the City of Fayetteville, NC

Community Development Block Grant Program (CDBG)	
CDBG Administration	$ 350,000
Acquisition of Property	$ 175,000
Housing Rehabilitation	$ 300,000
Homeownership Assistance	$ 110,000

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Fair Housing	$ 75,000
Assistance for the Homeless	$ 24,000
Economic Development	$ 425,000
Public Services	$ 30,000
Total:	**$ 1,589,000**

In its FY 2020-2024 Five Year Consolidated Plan, the City of Fayetteville identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

City of Fayetteville, NC - Five Year Objectives

Housing Strategy – HSS
Objective
HSS-1 Homeownership Assistance – Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
HSS-2 Housing Construction – Promote and assist in the development of new affordable housing inventory, both rental and sales housing.
HSS-3 Housing Rehabilitation – Promote and assist in the preservation of existing owner and renter occupied housing inventory in the City of Fayetteville.
HSS-4 Fair Housing – Affirmatively further fair housing by promoting fair housing choice throughout the City of Fayetteville.
HSS-5 Housing Education – Promote and assist in educating homeowners, tenants, landlords, and new homebuyers in best practices for purchase and maintenance of affordable housing rentals, including foreclosure and eviction prevention.
HSS-6 Rental Assistance – Provide funds for tenant based rental assistance to make housing affordable to low- and moderate-income persons and families.
Homeless Strategy – HOM
Objective
HOM-1 Housing – Promote and assist in developing housing opportunities for persons and families experiencing homelessness, and those who are at-risk of becoming homeless.
HOM-2 Operation/Support – Promote and assist in program support services for the homeless.

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HOM-3 Homeless Prevention – Promote and assist in anti-eviction and prevention of unfair housing practices which may contribute to homelessness.
HOM-4 Permanent Supportive Housing – Promote and assist in the development of permanent supportive housing and services.
HOM-5 Shelter Housing – Support and assist in the development and operations of shelters for persons who are homeless or victims of domestic violence.
Other Special Needs Strategy – SNS
Objective
SNS-1 Housing – Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs through rehabilitation of existing housing and new construction of accessible housing.
SNS-2 Social Services – Promote and assist in supporting social service programs and facilities for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs.
SNS-3 Accessibility – Promote and assist in making accessibility improvements to owner occupied housing through rehabilitation and improve renter occupied housing by promoting reasonable accommodations for the physically disabled.
Community Development Strategy – CDS
Objective
CDS-1 Infrastructure – Improve the City's infrastructure through rehabilitation, reconstruction, and new construction of streets, walks, curbs, ADA ramps, retaining walls, sewer, linear lines, water, flood control, storm water management and separation, bridges, bike trails, green infrastructure, etc.
CDS-2 Community Facilities – Improve the City's parks, recreational centers, and public and community facilities through rehabilitation, preservation, and new construction.
CDS-3 Public Services – Improve and increase public service programs for the youth, the elderly, developmentally delayed, disabled, and target income population, including nutrition programs and social/welfare programs throughout the City.
CDS-4 Public Transit – Promote the development of additional bus routes and improve public transportation for low- and moderate-income persons, and special needs.
CDS-5 Clearance – Remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures throughout the City.

DRAFT

CDS-6 Architectural Barriers – Remove architectural barriers and make public and community facilities accessible to all residents.
CDS-7 Public Safety – Improve public safety through upgrades to facilities, purchase of new equipment, crime prevention, community policing, and ability to respond to emergency situations.
CDS-8 Revitalization – Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, code enforcement, and designation of an NRSA project area.
Economic Development Strategy – EDS
Objective
EDS-1 Employment – Support and encourage new job creation, job retention, employment, and job training services.
EDS-2 Financial Assistance – Support business retention and commercial growth through expansion and new development with technical assistance and low interest loan programs including Section 108 loans.
EDS-3 Small Business Assistance – Support and encourage the creation, growth, expansion, and retention of small businesses in the City of Fayetteville with technical assistance, exterior rehabilitation programs, and low interest loan programs.
EDS-4 Financial Incentives – Support and encourage new economic development through local, state and Federal tax incentives and programs.
EDS-5 Development Program – Plan and promote the development and reuse of vacant commercial and industrial sites and facilities.
Administration, Planning & Management Strategy – APM
Objective
APM-1 Management – Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal programs.
APM-2 Planning – Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.
APM-3 NRSA – Prepare a Neighborhood Revitalization Strategy Area (NRSA) Plan for the Shaw Heights Neighborhood.
APM-4 Choice Neighborhood – Prepare and submit an application for funding under the Choice Neighborhood Initiative Program.

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Cumberland County

Cumberland County annually receives from HUD approximately $800,000 in CDBG funds. The County allocates its funds to public

facility improvements, housing rehabilitation, slums and blight removal, administration, and public services.

In particular, the County proposed to allocate FY 2020 CDBG funds as outlined in the following table to affirmatively further fair housing. Cumberland County anticipates a reduction in the annual CDBG allocation in the coming years as a result of further cuts in the Federal budget.

FY 2020 CDBG Allocation for the Cumberland County, NC

Community Development Block Grant Program (CDBG)	
CDBG Administration	$ TBD
Housing Construction	$ TBD
Housing Rehabilitation	$ TBD
Operations for Homeless Shelters	$ TBD
Public Facilities	$ TBD
Public Services	$ TBD
Total:	$ TBD

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In its FY 2020-2024 Five Year Consolidated Plan, Cumberland County identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

Cumberland County, NC - Five Year Objectives

Housing Strategy – HSS
Objective
HSS-1 Homeownership Assistance – Promote and assist in developing homeownership opportunities for low- and moderate-income households.
HSS-2 Housing Construction – Promote and assist in the development of new affordable housing inventory for both rental and sales housing.
HSS-3 Housing Rehabilitation – Promote and assist in the preservation of existing owner and renter occupied housing inventory in Cumberland County.

HSS-4 Fair Housing – Affirmatively further fair housing by promoting fair housing choice throughout Cumberland County.
HSS-5 Housing Education – Promote and assist in educating homeowners, tenants, landlords, and new homebuyers in best practices for purchase and maintenance of affordable housing rentals, including foreclosure and eviction prevention.
HSS-6 Housing Purchase – Provide funds for downpayment assistance and acquisition for rehabilitation to make housing affordable to low- and moderate-income persons and families.
Homeless Strategy – HOM
Objective
HOM-1 Housing – Promote and assist in developing housing opportunities for persons and families experiencing homelessness, and those who are at-risk of becoming homeless.
HOM-2 Operations/Support – Promote and assist in program support services for the homeless.
HOM-3 Homeless Prevention – Promote and assist in anti-eviction and prevention of unfair housing practices which may contribute to homelessness.
HOM-4 Permanent Supportive Housing – Promote and assist in the development of permanent supportive housing and services.
HOM-5 Shelter Housing – Support and assist in the development and operations of shelters for persons who are homeless or victims of domestic violence.
Other Special Needs Strategy – SNS
Objective
SNS-1 Housing – Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs through rehabilitation of existing housing and construction of new accessible housing.
SNS-2 Social Services – Promote and assist in supporting social service programs and facilities for the elderly, persons with disabilities, the developmentally delayed, and persons with other special needs.
SNS-3 Accessibility – Promote and assist in making accessibility improvements to owner occupied housing through rehabilitation and improve renter occupied housing by promoting reasonable accommodations for the physically disabled.
SNS-4 Reasonable Accommodations – Promote, support, and advocate for reasonable accommodations that should be made to assist the physically disabled to live in accessible housing.

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Community Development Strategy – CDS
Objective
CDS-1 Infrastructure – Improve the County's infrastructure through rehabilitation, reconstruction, and new construction of streets, walks, curbs, ADA ramps, retaining walls, sewer, linear lines, water, flood control, storm water management and separation, bridges, bike trails, green infrastructure, etc.
CDS-2 Community Facilities – Improve the County's parks, recreational centers, and public and community facilities through rehabilitation, preservation, and new construction.
CDS-3 Public Services – Improve and increase public service programs for the youth, the elderly, developmentally delayed, disabled, and target income population, including nutrition programs and social/welfare programs throughout the County.
CDS-4 Public Transit – Promote the expansion and development of additional bus routes and improvements to the public transportation system for low- and moderate-income persons, and special needs.
CDS-5 Clearance – Remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures throughout the County.
CDS-6 Architectural Barriers – Remove architectural barriers and make public and community facilities accessible to all residents.
CDS-7 Public Safety – Improve public safety through upgrades to facilities, purchase of new equipment, crime prevention, community policing, and ability to respond to emergency situations.
CDS-8 Revitalization – Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, code enforcement, and designation of an NRSA project area.
Economic Development Strategy - EDS
Objective
EDS-1 Employment – Support and encourage new job creation, job retention, workforce development, employment, and job training services.
EDS-2 Financial Assistance – Support business retention and commercial growth through expansion and new development with technical assistance and low interest loan programs including Section 108 loans.
EDS-3 Financial Incentives – Support and encourage new economic development through local, state and Federal tax incentives and programs.

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Administration, Planning & Management Strategy – APM
Objective
APM-1 Management – Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal programs.
APM-2 Planning – Continue to develop and plan for special studies, environmental clearance, fair housing, Section 108 Loan Application, NRSA Plans, and compliance with all Federal, state, and local laws and regulations.
APM-3 NRSA – Prepare a Neighborhood Revitalization Strategy Area (NRSA) Plan for the Shaw Heights Neighborhood.

The following attached maps illustrate the locations of CDBG funded activities in Cumberland County:

- CDBG Activities Funding
- CDBG Acquisition Activities
- CDBG Economic Development Activities
- CDBG Housing Activities
- CDBG Public Improvement Activities
- CDBG Public Service Activities
- CDBG All Activities

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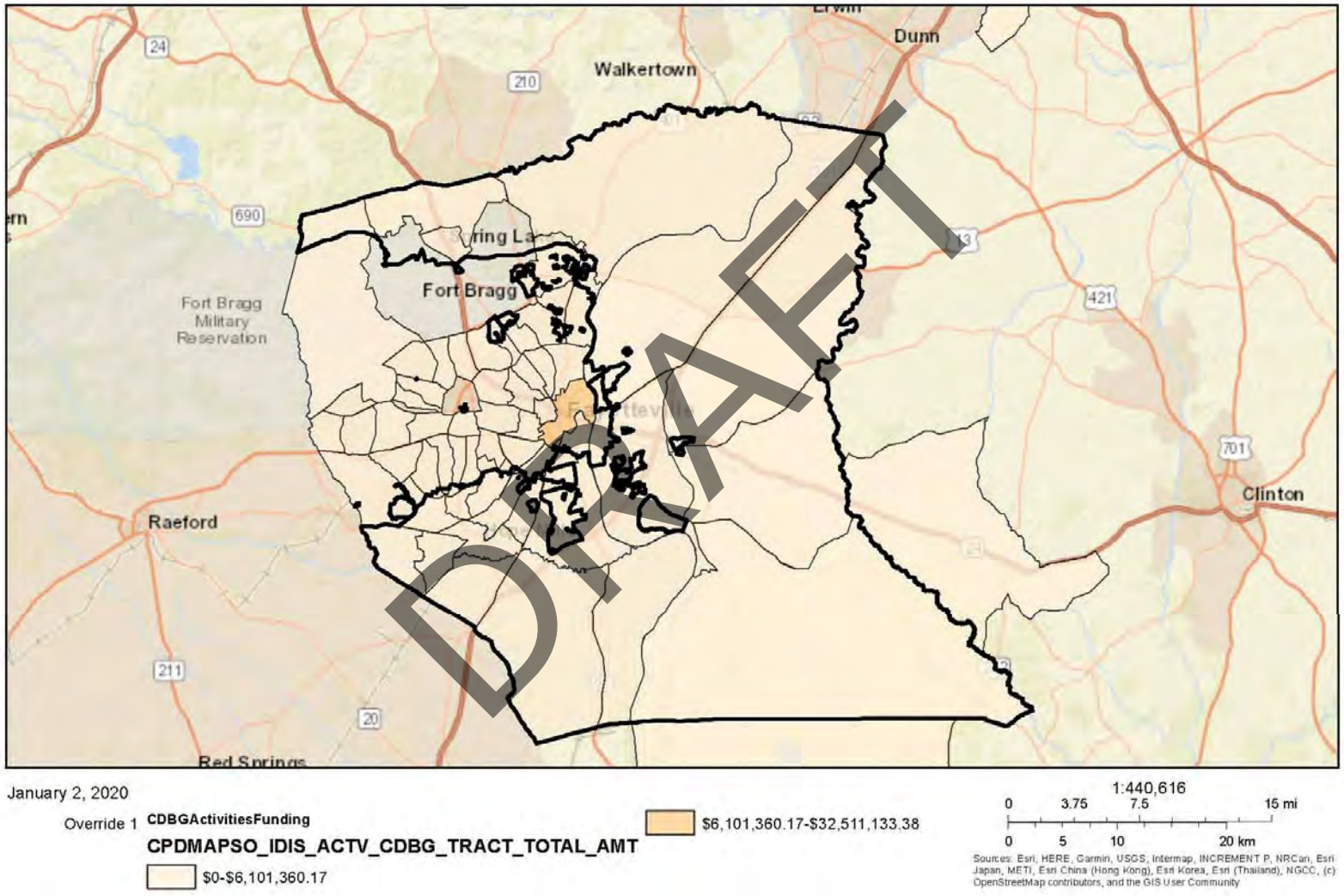
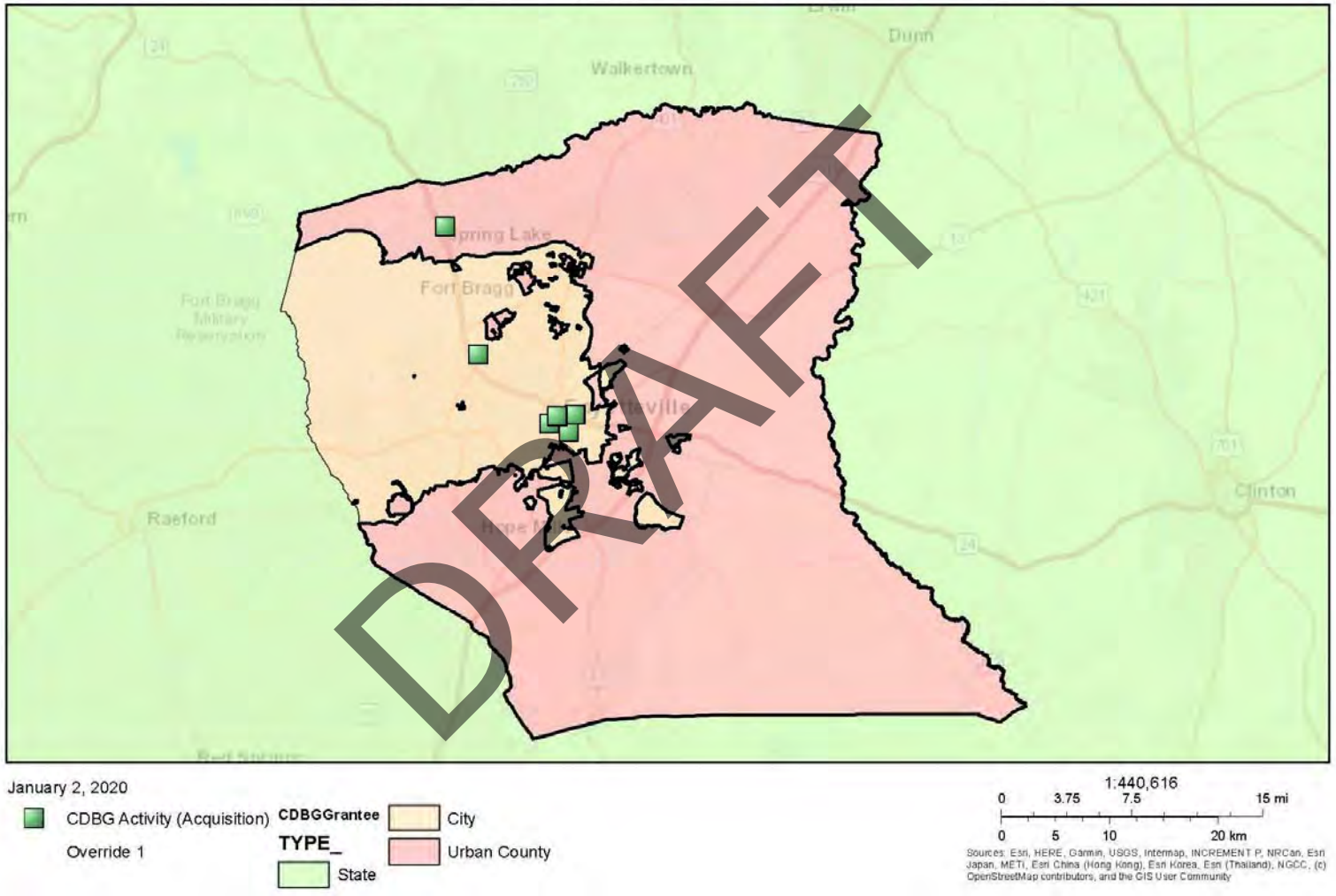
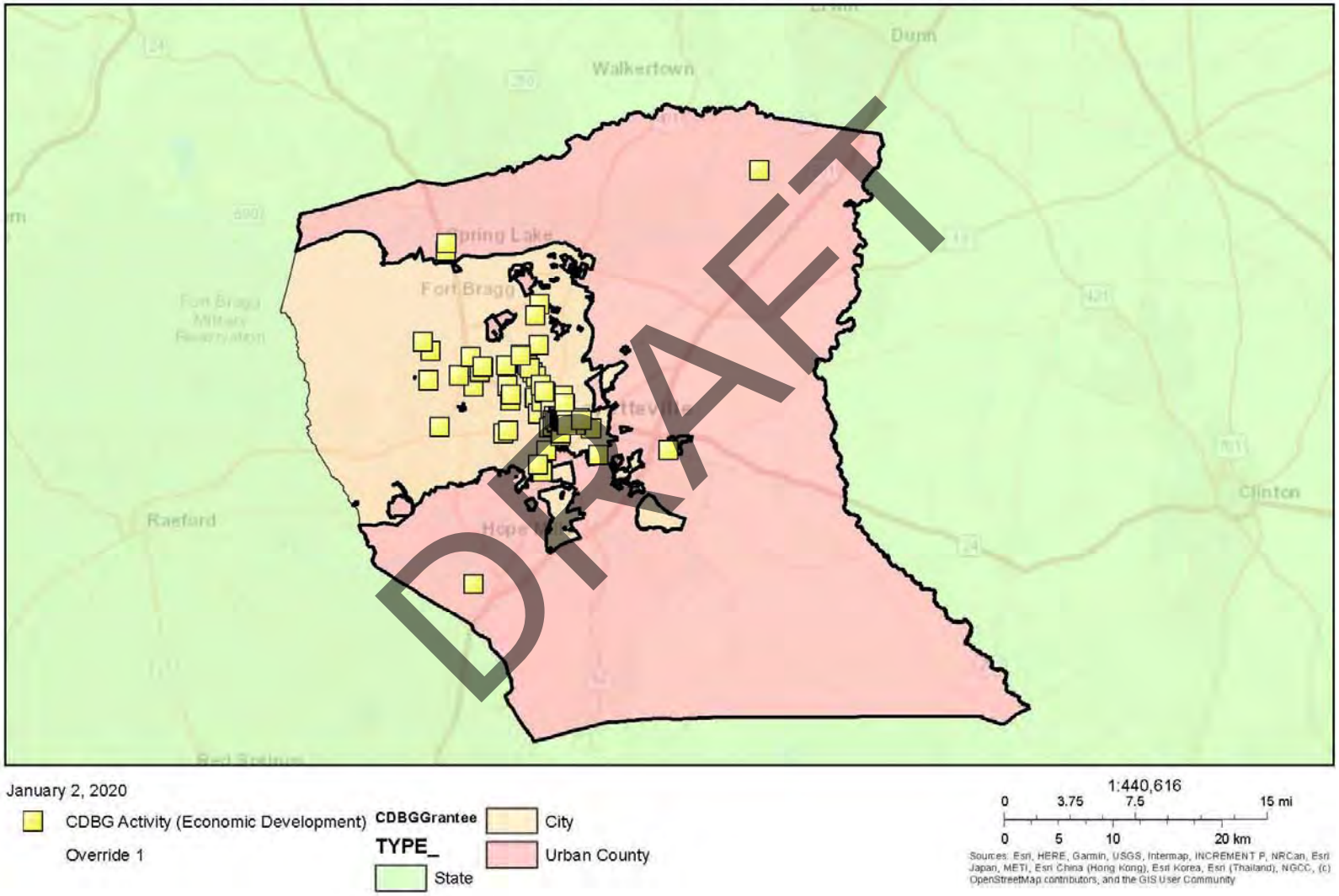
CDBG Funding - Cumberland County, NC



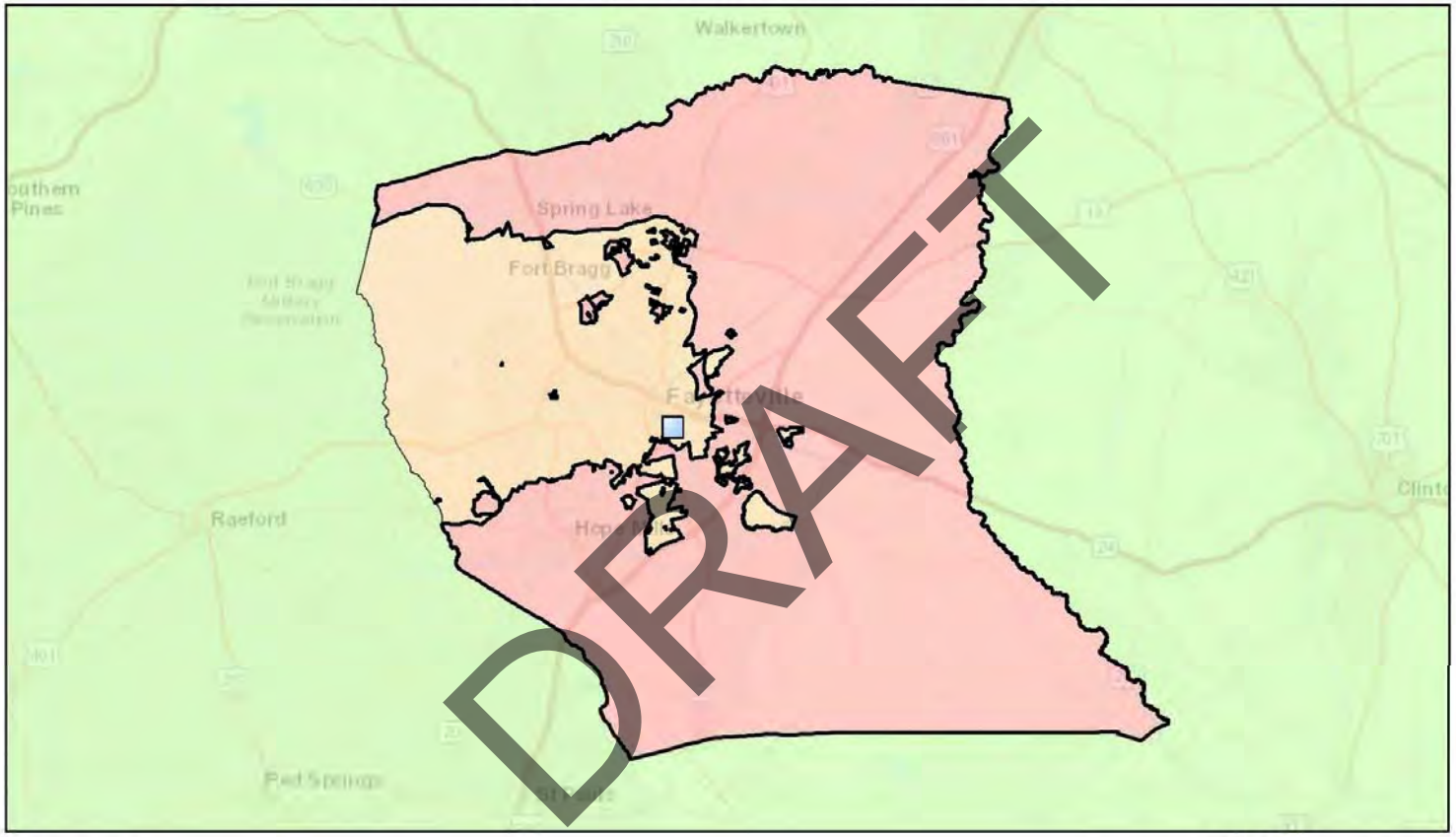
CDBG Acquisitions - Fayetteville & Cumberland County, NC



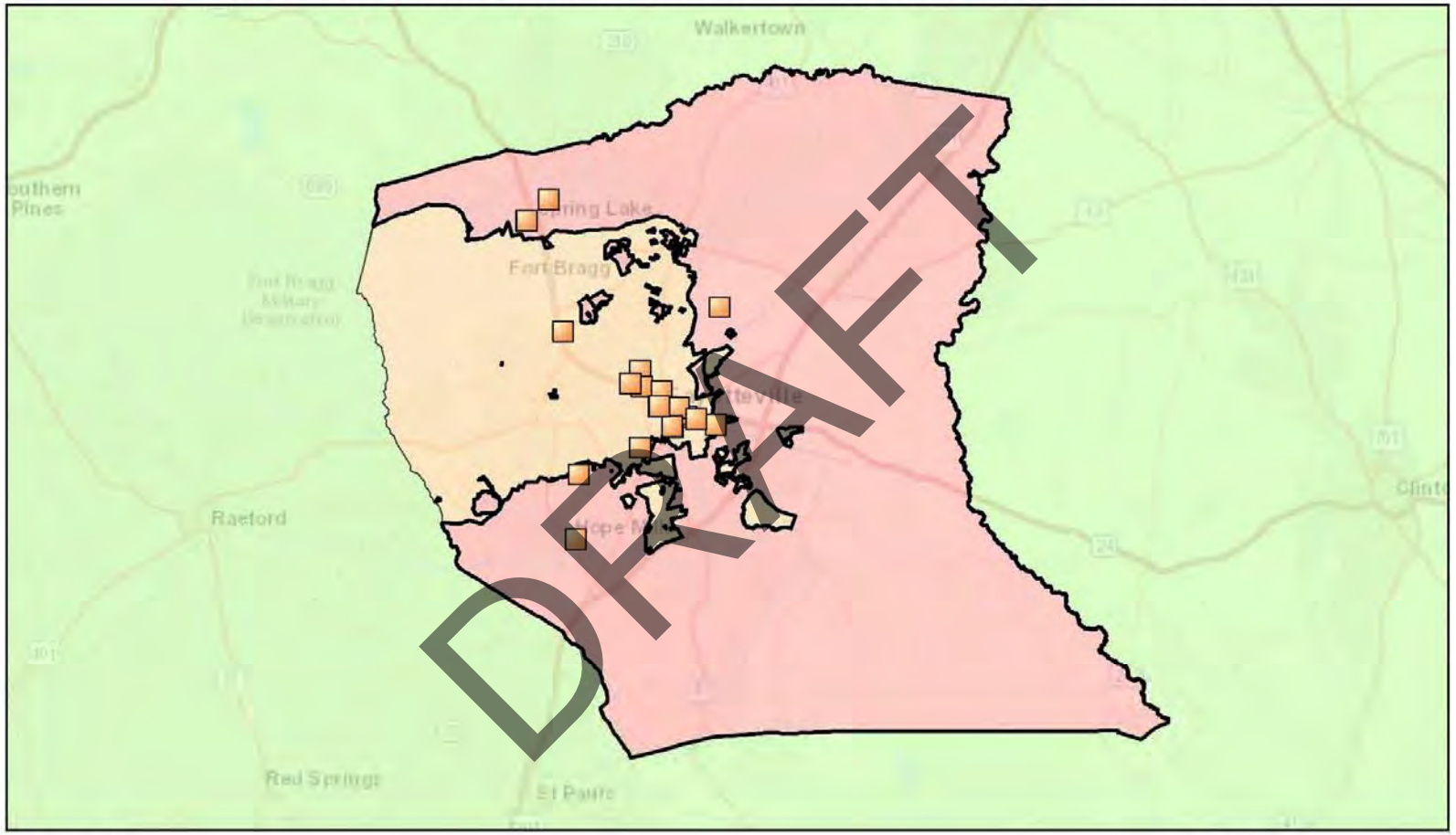
CDBG Economic Development - Fayetteville & Cumberland County, NC



CDBG Housing - Fayetteville & Cumberland County, NC



CDBG Public Improvements - Fayetteville & Cumberland County, NC



January 2, 2020

CDBG Activity (Public Improvements)

Override 1

CDBGGrantee

TYPE_

City

Urban County

State

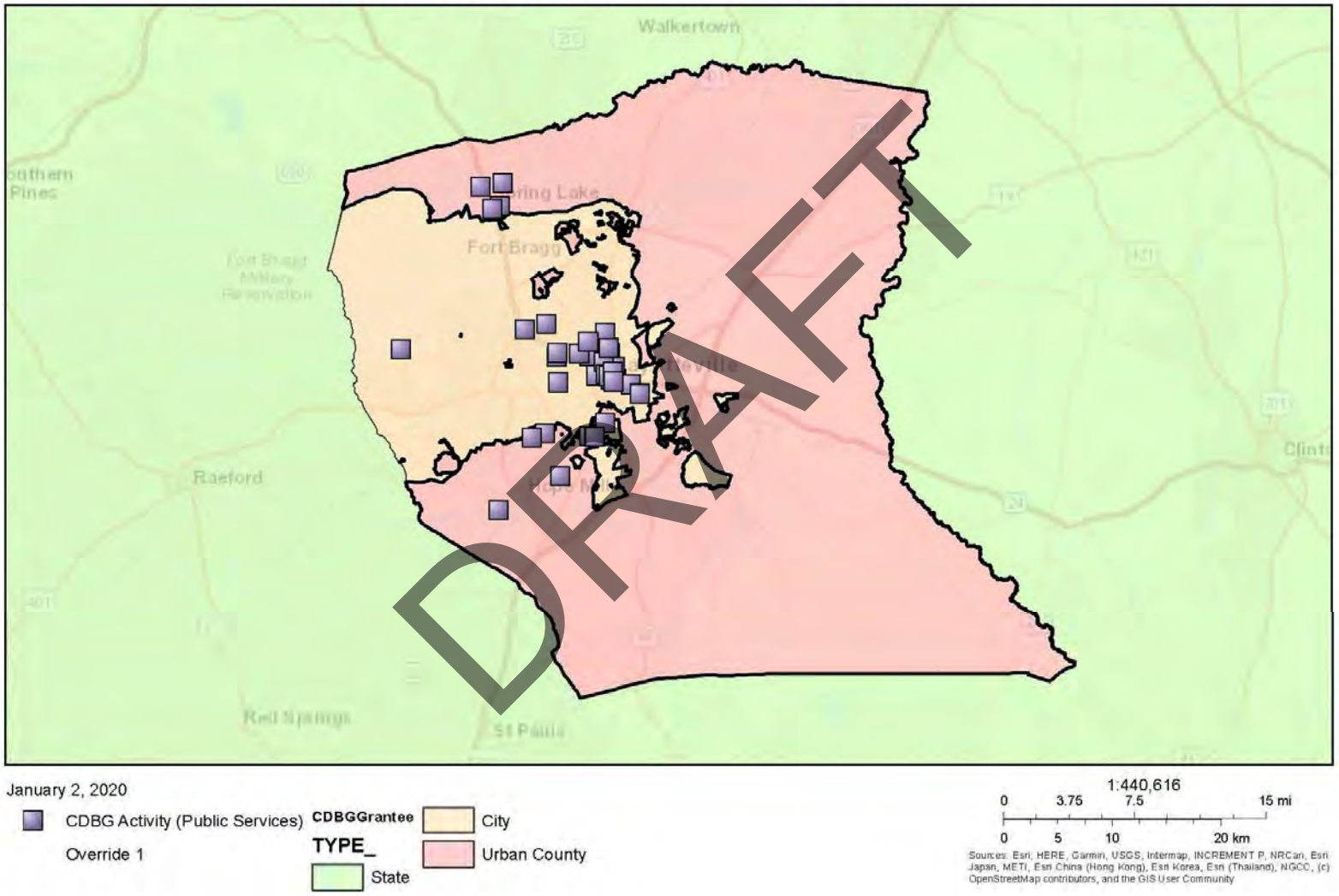
1:440,616

0 3.75 7.5 15 mi

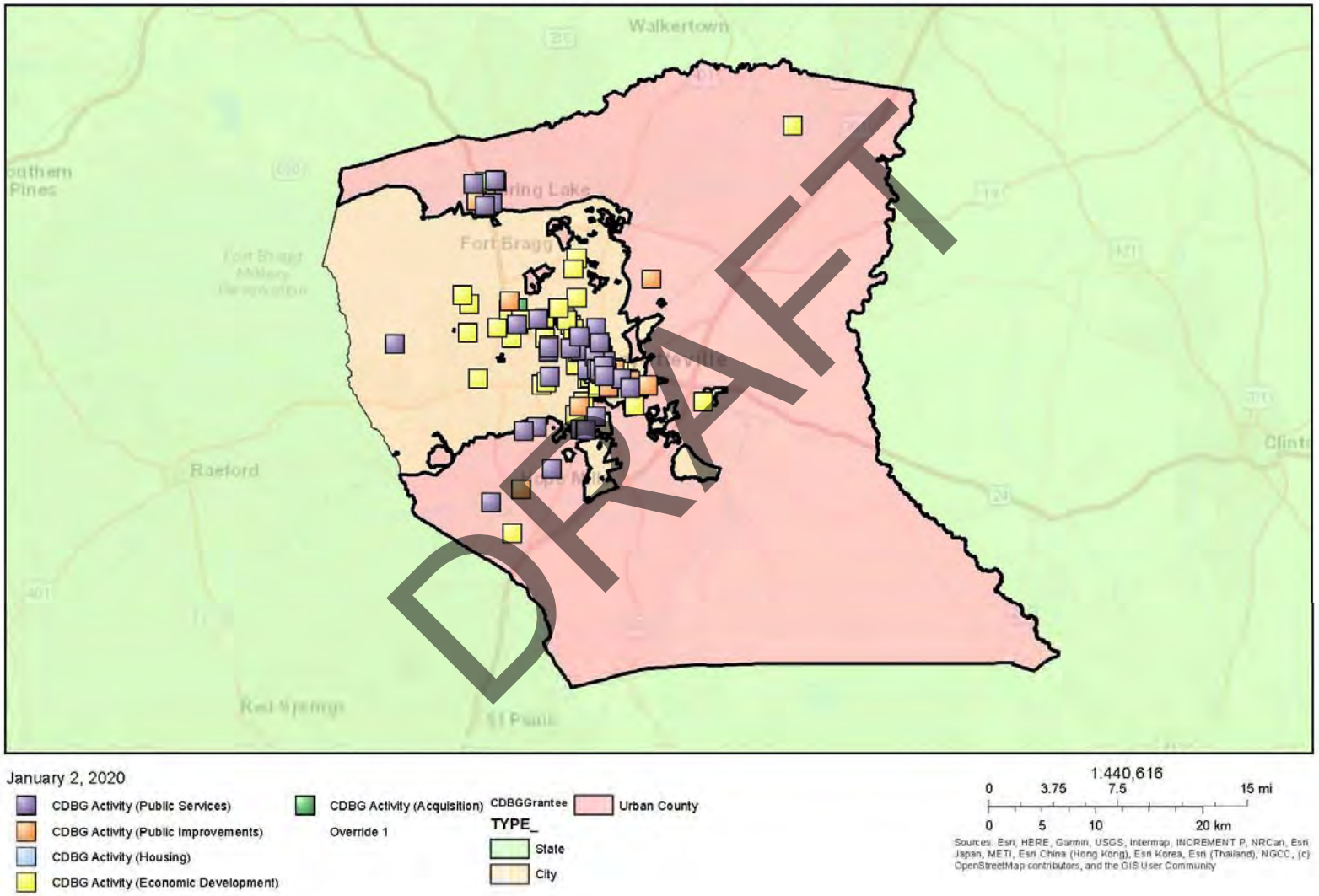
0 5 10 20 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

CDBG Public Services - Fayetteville & Cumberland County, NC



All CDBG Activities - Fayetteville & Cumberland County, NC



2. HOME Investment Partnership (HOME) Program

The City of Fayetteville

The City of Fayetteville annually receives from HUD approximately $1,130,000 in HOME funds. The City allocates its funds to new construction and tenant-based rental assistance.

In particular, the City proposes to allocate FY 2020 HOME funds as outlined in the following table to affirmatively further fair housing. The City of Fayetteville anticipates a reduction in the annual HOME allocation in the coming years as a result of further cuts in the Federal budget.

FY 2020 HOME Allocation for the City of Fayetteville, NC

HOME Investment Partnership (HOME) Program		
HOME Administration	$	200,000
New Construction – Affordable Housing	$	400,000
Housing Rehabilitation	$	280,000
CHDO Set-Aside Funds	$	250,000
Total:	**$**	**1,130,000**

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Cumberland County

Cumberland County annually receives from HUD approximately $350,000 in HOME funds. Cumberland County allocates its funds to new construction and tenant-based rental assistance.

In particular, Cumberland County proposed to allocate FY 2020 HOME funds as outlined in the following table to affirmatively further fair housing. Cumberland County anticipates a reduction in the annual HOME allocation in the coming years as a result of further cuts in the Federal budget.

FY 2020 HOME Allocation for Cumberland County, NC

HOME Investment Partnership (HOME) Program	
HOME Administration	$ TBD
New Construction – Affordable Housing	$ TBD
Tenant-Based Rental Assistance	$ TBD
CHDO Set-Aside Funds	$ TBD
Total:	**$ TBD**

The following attached map illustrate the locations of HOME funded activities in Cumberland County:

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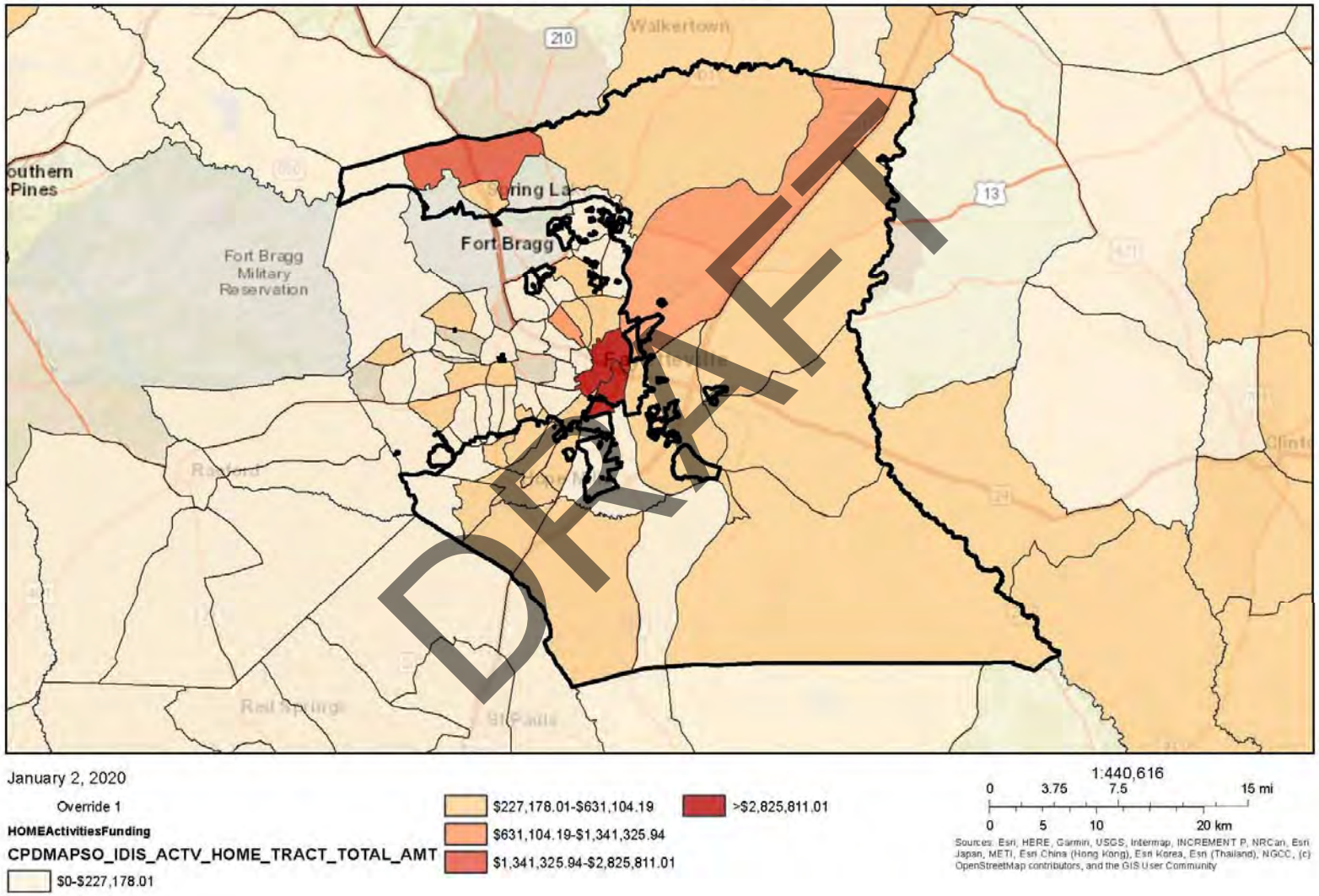
All HOME Funded Activities - Cumberland County, NC



3. Continuum of Care (CoC)

The Fayetteville-Cumberland County Continuum of Care addresses homelessness throughout the entirety of the County. The Continuum of Care is composed of a variety of stakeholders including churches, advocates, emergency shelters and other nonprofits, affordable healthcare providers, employment training programs, the Fayetteville Metropolitan Housing Authority, the City of Fayetteville, and Cumberland County.

Cumberland County is the lead entity for the Fayetteville-Cumberland County Continuum of Care. The CoC has begun implementing a Coordinated Entry strategy through Cumberland Healthnet to conduct intake and referrals for homeless persons and persons at risk of homelessness within Cumberland County. During the intake process, a person is evaluated with the VI-SPDAT, scored and ranked in terms of services needed, and referred to an available bed. Available beds are coordinated in a by-name list every Tuesday afternoon at a CoC meeting. Since the system began in April of 2019, there have been over 172 assessments conducted and over 142 families and 80 individuals placed in housing.

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4. Fayetteville Metropolitan Housing Authority –

Fayetteville Metropolitan Housing Authority
88 Grove View Terrace
Fayetteville, NC 28301
(910) 483-6980
http://www.fayettevillemetrohousingauthority.org

The Fayetteville Metropolitan Housing Authority is the primary provider of affordable housing in the City of Fayetteville and Cumberland County. It runs programs for both public housing and Section 8 Housing Choice Vouchers. All properties owned by FMHA are public housing properties, and there are no project-based developments. However, FMHA has partnered with United Management II for Low-Income Housing Tax Credit (LIHTC) developments. It has placed voucher holders in LIHTC developments, and will be receiving the Cross Creek development from United Management II in 2021.

The Fayetteville Metropolitan Housing Authority is recognized as a public body corporate and a "Public Housing Authority" of the U.S. Department of Housing and Urban Development and the State of North Carolina. The Housing Authority is considered a "high performer" by HUD and its everyday operations are handled by an Executive Director. Because the Fayetteville Metropolitan Housing Authority receives applications from all over the United States (due to the presence of Fort Bragg and the large number of people moving to the area for military service), FMHA rarely accepts applications.

Fayetteville Metropolitan Housing Authority's Plan to meet its community's housing needs by providing decent, safe and affordable housing. It is the goal of the Housing Authority to promote self-sufficiency, personal growth and neighborhood revitalization by maximizing its resources and maintaining the fiscal veracity of the agency. It is FMHA's belief that housing is a basic right and the substance for a successful life. The Housing Authority staff are committed to serving the Fayetteville community in a manner that demonstrates professionalism, care and consideration.

Fayetteville Metropolitan Housing Authority owns and professionally manages family communities and elderly/disabled rental apartments. FMHA has eleven (11) developments that it manages throughout the City of Fayetteville and Cumberland County. There are 1,045 housing units that comprise these eleven (11) communities. The waiting list for public housing is closed, and there are 354 households on that waiting list.

The breakdown of the waiting list is 61.3% single-person households, 34.7% two-person households, 3.5% three-person households, 0.8% four-person households, and 0.5% five-person or greater households, for a total of 354 households on the waiting list as of January 9, 2020 (the last waiting list available). With public housing occupancy is at 98%, there is a greater demand than supply. However, public housing residents have been converting to Section 8, and demand for public housing has decreased among households who qualify for Section 8.

FMHA has a Family Self-Sufficiency program which utilizes escrow accounts to purchase a home. FMHA does not have any homebuyer programs.

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Fayetteville Metropolitan Housing Authority administers 1,749 Section 8 Housing Choice Vouchers as of October 15, 2019. A total of 1,714 of these voucher holders are living in Section 8 Housing. Demand for a quality Section 8 Housing rental exceeds the supply of decent, affordable rental units. Section 8 Housing is currently at 98% occupancy. There were 252 families/individuals on the Housing Choice Voucher waiting list as of January 8, 2020 (the most recent waiting list available). The waiting list is currently closed.

FMHA attends an annual fair housing training that is conducted by City and County staff. The most recent seminar was held in 2019.

Fayetteville Metropolitan Housing Authority has a resident council composed of a representative from every public housing community. These positions are consistently filled. A public housing community that had previously been represented will often continue to have representation without long gaps.

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Public Housing –

HUD provides funding to the Fayetteville Metropolitan Housing Authority through its Capital Improvement Program and Housing Choice Voucher Program. FMHA owns and manages 1,045 public housing units. Thirty-two (32) of these units are elderly housing in Hillside Manor. Additionally, FMHA administers a Family Self Sufficiency Program that offers families an opportunity to participate in a program that provides them opportunity to work with a caseworker to develop a plan to gain access to education and job programs.

Fayetteville Metropolitan Housing Authority – Public Housing

Address	Owner/Manager	Units
Grove View Terrace I **Grove Street, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	56
Grove View Terrace II **Grove Street, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	156
Hillside Manor **Rosehill Road, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	32
Melvin Place **Rosehill Road, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	58

Point Place **Chestnut Street, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	52
Murchison Townhouses **Rosemary Street, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	60
Blueberry Place **North Street, Ext., Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	48
Holland Homes **Enterprise Ave, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	60
Lewis Heights **Johnson Street, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	48
Stanton Arms **Whitfield Street, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	52
McNeill Apartments **Ireland Drive, Fayetteville, NC**	Fayetteville Metropolitan Housing Authority	50
Scattered Site **Throughout Fayetteville, NC and Cumberland County, NC**	Fayetteville Metropolitan Housing Authority	124

Source: Fayetteville Metropolitan Housing Authority

The following table provides the number of residents on the public housing waiting list, and the percentage identified as white, black, or Hispanic.

Fayetteville Metropolitan Housing Authority
Demographics of Public Housing Waiting List

Demographic Characteristics	Number on Waitlist	Percent on Waitlist
White	58	15.51%
Black or African American	299	79.95%
Hispanic or Latino	25	6.68%
American Indian or Alaskan Native	5	1.34%
Other Race or Ethnicity	12	3.21%
Persons with Disabilities	13	3.48%
Families with Children under the age of 18	135	36.10%
Elderly Families	53	14.17%

Source: Fayetteville Metropolitan Housing Authority Five Year Plan

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Section 8 –

The Fayetteville Metropolitan Housing Authority oversees the Section 8 Housing Choice Voucher Program. Eligible participants who receive vouchers may search on their own for privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside R/ECAPs. Fayetteville Metropolitan Housing Authority grants extensions to Voucher Holders to assist them in finding housing that passes the Section 8 inspection. The Section 8 Housing Choice Voucher utilization rate is currently 98%.

Additionally, Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher holders and public housing tenants. FSS residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. FMHA has a baseline of 1,749 Section 8 Housing Choice Vouchers, with 1,714 of these vouchers in use. The following map shows the locations of Section 8 Housing Choice Voucher holders by ZIP Code in Cumberland County:

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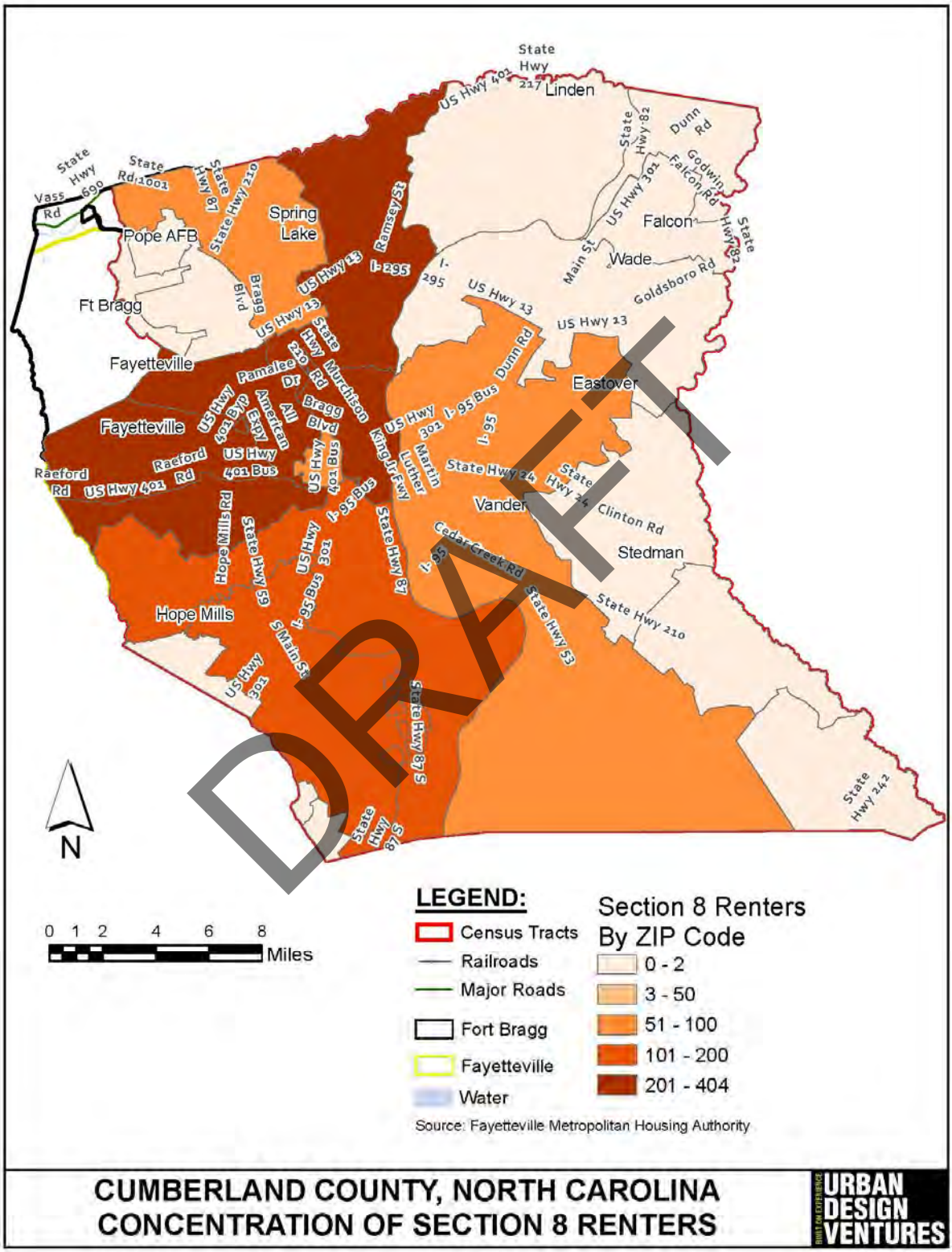
State Hwy 217
Linden
US Hwy 401
State Hwy 82
Dunn Rd
Godwin Falcon Rd
US Hwy 301
Falcon
State Hwy 82
State Hwy 690
Vass Rd
State Rd 1001
State Hwy 87
State Hwy 210
Spring Lake
Ramsey St
Pope AFB
Main St
Wade
I-295
US Hwy 13
Goldsboro Rd
Ft Bragg
Bragg Blvd
Fayetteville
Pamalee Dr
State Hwy 210
Murchison Rd
Eastover
Dunn Rd
Bragg Blvd
US Hwy 401 Byp
American Exy
All
US Hwy 301
I-95 Bus
I-95
Raeford Rd
US Hwy 401
US Hwy 401 Bus
King Jr Fwy
Luther Martin
State Hwy 24
Vander
Clinton Rd
Stedman
Hope Mills Rd
State Hwy 59
US Hwy 301
I-95 Bus
State Hwy 87
Cedar Creek Rd
I-95
State Hwy 210
Hope Mills
S Main St
State Hwy 53
State Hwy 87 S
State Hwy 87
State Hwy 242
N
0 1 2 4 6 8
Miles
LEGEND:
Census Tracts
Railroads
Major Roads
Fort Bragg
Fayetteville
Water
Section 8 Renters By ZIP Code
0 - 2
3 - 50
51 - 100
101 - 200
201 - 404
Source: Fayetteville Metropolitan Housing Authority
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CUMBERLAND COUNTY, NORTH CAROLINA
CONCENTRATION OF SECTION 8 RENTERS
URBAN DESIGN VENTURES

Deconcentration Policy –

It is the Fayetteville Metropolitan Housing Authority's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, the Housing Authority reserves the right to skip families on the waiting list to reach other families with a lower or higher income.

The Fayetteville Metropolitan Housing Authority will affirmatively market its housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, the Housing Authority analyzes the income levels of families residing in each of its developments and the income levels of the families on the waiting list. Based on this analysis, the Housing Authority determines the level of marketing strategies and deconcentration incentives to implement.

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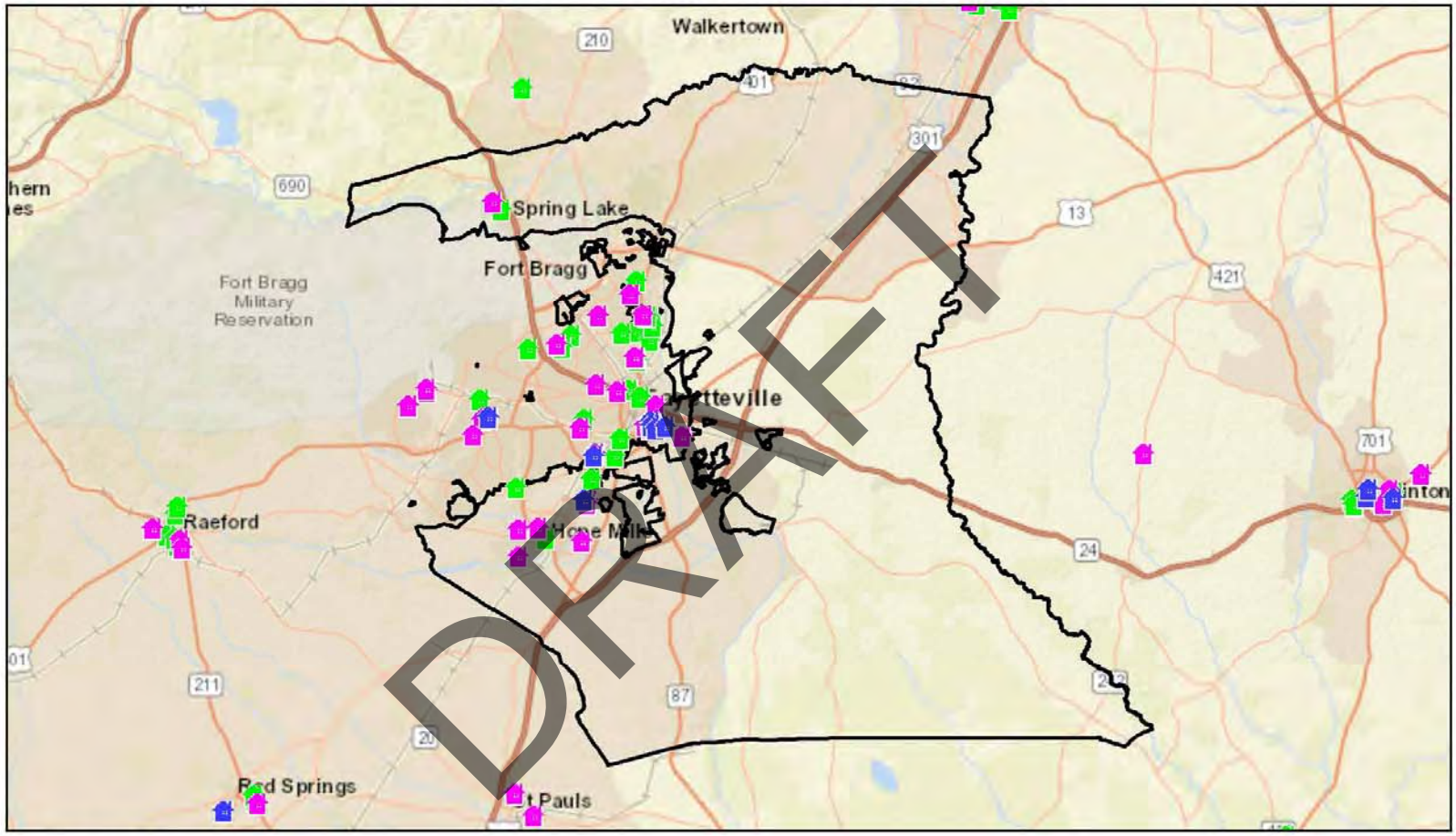
5. Indian Housing Authority –

North Carolina Indian Housing Authority
1019 Elliott Circle
Fayetteville, North Carolina 283021
(910) 488-1869

The Indian Housing Authority is a manager of affordable housing and a developer that undertakes rehabilitation of housing, offers rentals, and has homeownership initiatives. They exist to help Indians in the State, but they serve anyone that needs housing and only have a few Indian tenants in the circle.

The Indian Housing Authority has 117 units in the City of Fayetteville and 92 units in Cumberland County. In the City of Fayetteville, the Elliott Circle Development was a rehabilitation project of existing housing. The Indian Housing Authoirty will build houses for USDA Rural Development. They do not receive direct HUD funding and their board is structured with representatives from Indian Tribes and Organizations in North Carolina except for the Federal Tribe in the State.

HUD Supported Housing - Cumberland County, NC



January 2, 2020

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

Override 1

1:435,935

0 3.75 7.5 15 mi

0 5 10 20 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

4. Family Self-Sufficiency (FSS) –

Family Self-Sufficiency (FSS) programs are provided to Housing Choice Voucher holders and public housing tenants to transition from welfare to work or better paying jobs. The Head of Household works with the FSS staff to create a five-year plan, which lists steps they will take to pursue economic stability for their family. The plan includes goals to seek and maintain employment and become free of any welfare (cash) assistance received. Throughout the program, FSS staff helps families access government and community programs and services for financial aid, career training, job search, childcare, transportation, counseling, budgeting, credit repair, and even homeownership.

As the family progresses in their program, any rent increases caused by increases in salary, better jobs, or wages are deposited in an FSS savings account. At the end of five years, when the Head of Household completes their FSS goals and "graduates," they are eligible to receive money collected in this account. Past participants in FSS have returned to school, obtained living wage jobs, improved credit and finances, purchased vehicles, started businesses, and bought homes of their choice. Their futures become more secure as they built assets.

5. Low Income Housing Tax Credit –

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households. This program provides a dollar-for-dollar tax credit to reduce the developer's Federal income tax. The City of Fayetteville and Cumberland County promote the use of Low Income Housing Tax Credits. The primary LIHTC developer in the Fayetteville area is United Management II. The following table shows LIHTC projects completed in Cumberland County since 2000. The LIHTC projects completed in the City of Fayetteville are highlighted.

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Cumberland County, NC LIHTC Projects

Project Name / HUD ID Number	Project Address	Project City	Project ZIP Code	Total Number of Units	Total Low-Income Units
Blanton Green Apts NCA20000035	Blanton Rd	Fayetteville	28303	48	48
Crosswinds Green II NCA20010040	3415 Town Street	Hope Mills	28348	48	48
Haymount Manor Apts NCA20010060	2040 Elvira Street	Fayetteville	28303	48	48
Rosehill West Apts NCA20020160	1945 James Hamner Way	Fayetteville	28311	76	76
Blanton Green II Apts NCA20030010	1024 Lauren Mcneil Loop	Fayetteville	28309	32	32
Legion Manor Apts NCA20030100	651 Sethway Road	Hope Mills	28348	44	44
Southview Green Apartments NCA20040180	Elk Road	Hope Mills	28348	72	72
Bunce Green Apts NCA20050030	1409 Distinct Circle	Fayetteville	28314	80	80
Bunce Manor Apartments NCA20050035	3450 Denise Place	Fayetteville	28314	48	48
Pineridge Manor NCA20050145	3200 Big Pine Drive	Hope Mills	28348	60	60
Rosehill Gardens Apartments NCA20050160	226 Tiffany Court	Fayetteville	28301	100	100
Eastside Green Apartments NCA20060090	708 Duggins Way	Fayetteville	28312	60	60
Fayetteville Gardens Apartments NCA20060100	2941 A Gordon Way	Fayetteville	28303-5479	100	100
Legion Crossing Apartments NCA20060145	3608 Ireland Drive	Hope Mills	28348	48	48
Pine Chase NCA20060170	3181 Big Pine Drive	Hope Mills	28345	32	32
Tokay Green Apartments NCA20060200	1928 Florida Drive	Fayetteville	28301	80	80
Blanton Green III Apartments NCA20070025	Lauren Mcneill Loop	Fayetteville	28303	36	36
Eastside Green II Apartments NCA20080065	708 Duggins Way	Fayetteville	28312	48	48
Southview Villas NCA20080175	3315 Gibbon Dr	Hope Mills	28348-5810	64	64
Maple Ridge NCA20087020	4810 Canyon Crest Cir	Fayetteville	28314-0766	48	48
Maple Ridge Apartments - Phase 3 NCA20100155	6736 Bone Creek Drive	Fayetteville	28314	80	80
Spring Lake Green Apartments NCA20100210	401 Odell Road	Spring Lake	28390	48	48
Dogwood Manor NCA20110030	422 Alfred Street	Fayetteville	28301	36	36

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Oak Run NCA20110090	500 Campbell Terrace	Fayetteville	28301	112	112
Sycamore Park NCA20110160	604 Volunteer Drive	Fayetteville	28301	184	184
Hickory Ridge NCA20114017	1249 Beebe Estate Circle	Fayetteville	28314	72	72
Colony Place NCA20120045	2095 Hyde Place	Fayetteville	28306	100	100
Eastside Green III Apartments NCA20120060	Duggins Way	Fayetteville	28312	40	40
Azalea Manor NCA20123007	230 Lincoln Dr	Fayetteville	28301-5696	72	72
Oak Run II NCA20130013	575 Scarborough Street	Fayetteville	28301	118	118
Cypress Manor NCA20140055	217 Lincoln Drive	Fayetteville	28301	48	48
Cape's Landing Apartments NCA20160994	1404 Deer Trail Drive	Fayetteville	28314	96	96

Source: http://lihtc.huduser.org/

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6. HUD Assisted Housing –

HUD previously funded the Section 202 and Section 811 Supportive Housing programs to encourage and support the development of assisted housing in cities and counties across the country. The Section 202 Supportive Housing for the Elderly Program provided financial support for the construction, rehabilitation, or acquisition of supportive housing for the elderly. Similarly, the Section 811 Supportive Housing for the Disabled provided financial assistance for nonprofit organizations seeking to develop affordable, supportive housing for low-income adults with disabilities. The City of Fayetteville and Cumberland County are supportive of the use of Section 202 and Section 811 Supporting Housing Programs, as well as the use of Low Income Housing Tax Credits (LIHTC).

7. Social Service Agencies –

The following table lists the organizations for the at-risk, homeless, or disabled populations in the City of Fayetteville and Cumberland County.

Supportive Service Programs

Agency Name	Description
Alliance Health	Alliance health offers treatment and support for people with mental illnesses, substance abuse disorders, and intellectual or developmental disabilities.
Center for Economic Empowerment and Development (CEED)	CEED provides a business center targeted toward women in the area, where it provides counseling, training, and lending programs. Additionally, CEED provides housing and self-sufficiency programs for women and families.
Coordinating Council on Older Adults	The Cumberland Council on Older Adults advocates for people aged 60 and over living in Cumberland County. They provide free services including Meals on Wheels, in-home aid, Senior Health Insurance, and counseling.
Cumberland HealthNet	Cumberland HealthNet provides health services for uninsured residents of Cumberland County, and is the lead for the Fayetteville-Cumberland County CoC's Coordinated Entry strategy. Cumberland HealthNet provides case management, prescription medications, mental healthcare, life skills assistance, and nutrition and patient education for uninsured residents, including homeless residents of the area.
Designing Station	Designing Station provides homeless individuals and families with job training. Additionally, they provide furniture to families in Cumberland County and Robeson County that are transitioning out of homelessness.
Endeavors	Endeavors is a national organization that provides a wide variety of social service programs for children, families, veterans, and people with mental illnesses. Services are provided from a community center in Fayetteville that addresses unemployment, child abuse, disabilities, and homelessness. Endeavors also provides Permanent Supportive Housing.
Family Promise	Family Promise serves unaccompanied youth in the Fayetteville-Cumberland County Region. They provide a shelter, along with food and support for children and families that are at-risk of homelessness.
Fayetteville Area Habitat for Humanity	Habitat for Humanity has a variety of programs to assist in providing quality housing for low- and moderate-income families, including homeownership programs, aging in place programs, and housing for victims of domestic violence.
Fayetteville Area Operation Inasmuch	Fayetteville Area Operation Inasmuch serves people who are homeless or at-risk of homelessness with meals and a variety of educational services. Fayetteville Area Operation Inasmuch runs The Lodge, which is a men's transitional shelter.

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Genesis Grace Ministry	Genesis Grace Ministry provides free meals and hygiene items to impoverished residents of Fayetteville.
Hope 4 NC	Hope 4 NC is an organization that works with Cumberland Disaster Recovery to provide outreach to individuals and families whose housing status was affected by Hurricane Florence.
Hope Center – True Vine Ministries	The Hope Center is a women's shelter in the City of Fayetteville. Additionally, the Hope Center operates the White Flag shelter during inclement weather.
Kingdom Community Development Corporation	Kingdom CDC provides a variety of housing services to residents of the City of Fayetteville and Cumberland County. Kingdom CDC focuses on new construction of new housing for low- and moderate-income individuals, as well as providing homeownership counseling for these individuals.
North Carolina Legal Aid	North Carolina Legal Aid provides pro bono legal services for individuals experiencing housing and employment discrimination, as well as other legal services.
NCWorks Career Center	NCWorks provides job training for workers in the Cumberland County Area, and connects employers to workers that either have or can be trained in their desired skills.
Pathways 4 Prosperity	Pathways 4 Prosperity is a partnership between a variety of governmental, nonprofit, and citizen volunteer groups to advocate for improving education, workforce development, affordable housing, and parent life skills in the region.
Salvation Army Fayetteville	The Salvation Army operates the largest homeless shelter in the region. The Salvation Army assists victims of domestic violence and victims of human trafficking at their shelters, and provides a veterans' emergency shelter. During inclement weather, The Salvation Army offers a White Flag shelter.
Seth's Wish	Seth's Wish operates a center for homeless individuals in Fayetteville. They offer resources for individuals facing food insecurity and provide day programming.
Stedman-Wade Health Services, Inc.	Stedman-Wade is a community health center that works with uninsured or underinsured individuals and families to provide medical, behavioral, and dental healthcare. The center works with homeless individuals, agricultural workers, residents of public housing, and veterans.
United Way of Cumberland County	United Way performs a variety of social services for low-income residents of the area. Services include youth programs, financial self-sufficiency education, connecting clients to accessible healthcare, and providing emergency food and safe shelter to those with critical needs.
Urban Ministries	Urban Ministries provides rapid rehousing to individuals and families that have recently experienced homelessness.

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Veterans Empowering Veterans	Veterans Empowering Veterans provides programs and services for homeless veterans, including food, shelter, substance abuse counseling, mental health care, and job training.
Volunteers of America	Volunteers of America provides housing for seniors and families of individuals with disabilities. Volunteers of America provides transitional housing for veterans, as well as job training for women veterans.

8. Planning, Zoning, and Building Codes

A joint Comprehensive Plan between the City and the County was approved in 1994.

The City of Fayetteville's Zoning Ordinance has been continuously updated to reflect the changing needs of the community. Variances are required for most multi-family housing, but the Planning Commission approves the vast majority of variances. In 2013, the City's Zoning Ordinance was updated to include density bonuses to encourage greater housing density within the City. This was done in part to mitigate the effects of climate change, but has effects on fair housing as well by acting as a tool in the developer's toolbox for affordable housing.

Cumberland County's Zoning Ordinance received its last comprehensive update in 2005. Much of the housing in the region is single-family housing.

Both the City and the County have distance requirements for group homes. The State of North Carolina allows for distance requirements between group homes, which had been adopted by both the City and the County, but is in violation of the Fair Housing Act.

Code Issues

In the City of Fayetteville and throughout Cumberland County, code enforcement issues are common, particularly in rental housing. The City and County are actively pursuing methods of resolving these issues. Windshield inspections are frequently conducted, as well as periodic walking inspections of rental properties. Code enforcement frequently cites absentee landlords for code deficient structures, as well as some overcrowded rental properties.

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Both code departments deal with large geographic areas and absentee landlords that lead to vacant properties. Additionally, there are a large number of trailer parks in both the City and the County with trailers that are in poor condition and owners that either cannot afford to rehabilitate them or choose not to do so. Due to North Carolina State Law, the City and County cannot create a rental registry to address these items.

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

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. "Visitable" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons.

Federal Requirements

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "*Section 504*" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and/or hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

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The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable accommodations to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

9. Taxes

Real estate property taxes may also impact housing affordability. This may not be an impediment to fair housing choice, but it does impact the affordability of housing.

The following table shows the millage rates for the jurisdictions in Cumberland County.

Cumberland County Property Taxes - 2019

	Tax Rate	Recreation Tax	County	Millage Rate
Fayetteville	.4995	N/A	.799	**.012985**
Hope Mills	.46	.05	.799	**.01309**
Spring Lake	.70	N/A	.799	**.01499**
Stedman	.32	.05	.799	**.01169**
Wade	.26	.05	.799	**.00999**
Falcon	.15	.05	.799	**.01109**
Godwin	.24	.05	.799	**.01089**
Linden	.30	.05	.799	**.01149**
Eastover	.205	N/A	.799	**.01004**
ETWN Vander	.205	N/A	.799	**.01004**

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Fayetteville Revitalization District	.5995	N/A	.799	**.013985**

Source: Cumberland County Office of Assessment

Tax relief is available for residents of Cumberland County through three avenues:

- Homestead Exclusion – Residents can qualify for an exclusion of greater than $25,000 or 50% of qualifying assessed land value if they are living in their permanent residence, are aged 65 or older or they are totally and permanently disabled, and have a combined applicant and income below $30,200.
- Circuit Breaker – Property taxes are deferred over a combined income limit of $45,300. Residents qualify by being 65 or older or being totally and permanently disabled, and owning and occupying their residence for the past 5 years.
- Disabled Veteran & Surviving Spouse Exclusion – Honorably discharged disabled veterans and unmarried surviving spouses will receive an exclusion of the first $45,000 of assessed property values.

10. Transportation

Transportation plays an important aspect in determining where residents choose to live. Some families choose to live in an area that is more private than physically connected, while others place more emphasis on proximity to main arteries and highways for commuting to work.

Fayetteville Area System of Transit (FAST)

FAST serves the City Fayetteville and Cumberland County, NC with 18 fixed routes and paratransit, known as FASTTRAC. All public transit is provided in the form of buses.

The last transit development plan update was completed by FAST in 2014. According to the plan, the greatest needs identified for the system were greater frequency of buses, later evening service,

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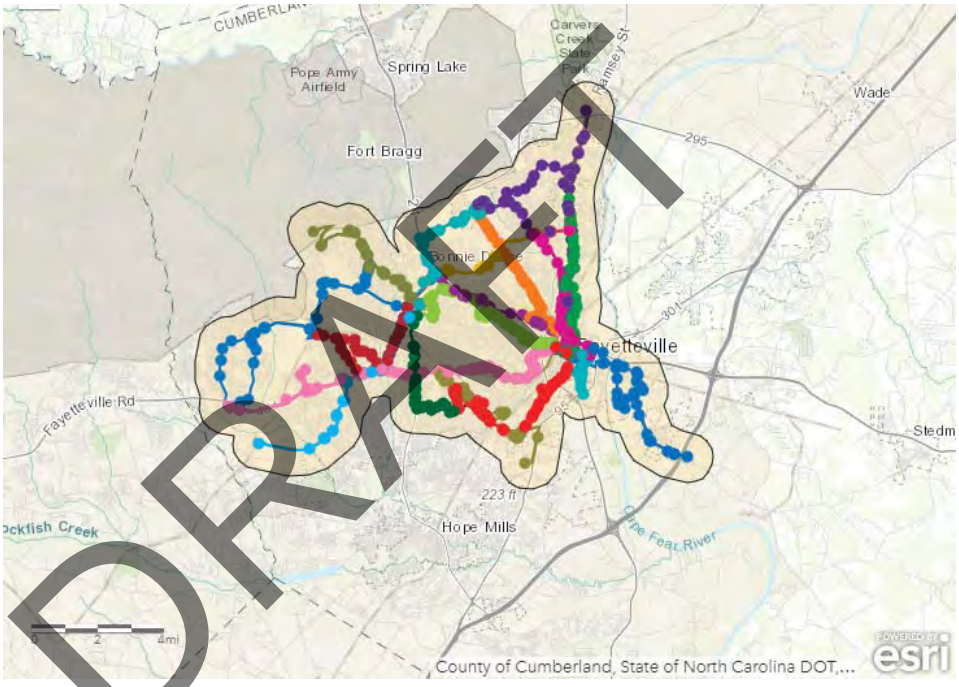
Sunday service, and flexibility to respond to emerging mobility needs. Of these, Sunday service and extended hours have been added to select fixed routes.

Based on stakeholder meetings, the greatest public transit needs in the area were increased route frequency, routes that connected residential areas to job centers, transit that operates outside of the City of Fayetteville, and routes that utilized main corridors.

The fixed route map for FAST is shown below:



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Source: Fayetteville Area System of Transit (FAST)

All FAST buses are equipped with bike racks and handicap lifts.

11. Jobs and Workforce Development

Access to good employment affects housing choice. However, there can be disparities in access to good jobs. The City of Fayetteville and Cumberland County have acknowledged these disparities and partner with local organizations to provide employment training. Stakeholders in the region have largely identified that low wages in the area contribute to poverty, and a service-oriented economy provides residents who are living in poverty with little upward

mobility. Organizations and programs that are in place to develop the County's workforce, with an emphasis on diversity, include:

- The City of Fayetteville's CDBG program provides a variety of small business loans, small business development grants, and job skills assistance programs to train the area's workforce and to provide low- and moderate-income residents with jobs.
- NCWorks provides job training and retraining for youth aged 14-24 years old, adults over 18, and dislocated workers. Job training goals include ensuring that trainees have the skills for labor that will be unsubsidized by Federal assistance, so trainees can be self-sufficient. NCWorks is developing a youth entrepreneurship initiative for young adults working in cyber security in an attempt to create homegrown industries. NCWorks has also developed partnerships with area universities and the Greater Cumberland County Sector Partnership to develop programs to encourage youth to train for healthcare positions.
- The Center for Economic Empowerment & Development (CEED) targets women in Cumberland County to encourage entrepreneurship and connect clients to the Small Business Administration (SBA) to acquire loans. CEED provides consultation and runs a women's business center. They are preparing to create a business incubator for food service businesses in the area.
- Volunteers of America provides employment training for women veterans who may be experiencing homelessness. Other job training programs for homeless women exist, including a program at Connections of Cumberland County, which provides a career lab through Fayetteville Technical Community College for the exploration of e-commerce careers.

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12. Education

Education is often an important factor influencing the opportunities where people choose to live. Fayetteville and Cumberland County comprise a unified City-County school district. It is a high-poverty school district with many challenges associated with the system. Fort Bragg is home to a separate school district for

Active Duty Service Members and DoD employees.

To ensure North Carolina schools are performing, the State uses the North Carolina School Report Card system, which is an online platform released annually in the Fall that provides district and building level academic scores to all schools. Additionally, the Report Card Site informs the public of the academic performance measures of each school and provides local teachers, administrators, and parents an opportunity to compare the performance of local schools.

There were 87 schools in the Cumberland County School District in the 2018-2019 school year. On the 2018-2019 Report Card, 4 schools received an A (4.8%), 23 received a B (27.4%), 33 received a C (39.3%), 23 received a D (27.4%), and 1 school received an F (1.2%). 16 schools exceeded their growth goals (20.0%), 36 schools met their growth goals (45.0%), and 28 schools did not meet their growth goals (35.0%).

The North Carolina Report Card system tracks performance among subgroups of students for grades 3-8. Levels 1 and 2 are considered below grade level, Level 3 is considered at grade level, and Levels 4 and 5 are considered above grade level. When taking these statistics into account, it is important to note that the Cumberland County School District has a large homeless population and a large foster care population. Additionally, the population that speaks English as a second language has been growing, and ESL has been a priority for the District. Cumberland County's proficiency data is shown below:

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NC REPORT CARD – MATH PERFORMANCE IN 2018

Math Performance	Not Proficient	Level 3	Level 4	Level 5
Other	43%	20%	34%	13%
ALL	50%	18%	25%	8%
Female	48%	19%	26%	8%
Male	51%	18%	24%	8%
American Indian	59%	17%	20%	<5%
Asian	20%	13%	36%	30%
Black	61%	18%	18%	<5%
Hispanic	49%	18%	26%	8%

Two or More Races	44%	20%	28%	8%
White	34%	19%	34%	13%
Academically/Intellectually Gifted	<5%	8%	50%	39%
Economically Disadvantaged	59%	18%	19%	<5%
English Learners	71%	15%	12%	<5%
Foster Care	68%	14%	16%	<5%
Homeless	67%	15%	15%	<5%
Military Connected	32%	19%	35%	13%
Students w/ Disabilities	84%	9%	6%	<5%

Source: NC Department of Public Instruction

NC REPORT CARD – ENGLISH LANGUAGE ARTS/READING PERFORMANCE IN 2018

English Language Arts/Reading Performance	Level 1	Level 2	Level 3	Level 4	Level 5
Other	17%	22%	15%	43%	13%
ALL	24%	22%	13%	34%	8%
Female	20%	22%	14%	36%	9%
Male	28%	22%	13%	31%	7%
American Indian	32%	25%	13%	25%	5%
Asian	10%	11%	10%	48%	21%
Black	31%	25%	13%	27%	<5%
Hispanic	23%	23%	13%	34%	8%
Two or More Races	20%	20%	15%	38%	8%
White	14%	17%	13%	43%	13%
Academically/Intellectually Gifted	<5%	<5%	<5%	56%	38%
Economically Disadvantaged	30%	25%	13%	27%	<5%
English Learners	55%	23%	8%	12%	<5%
Foster Care	37%	28%	11%	22%	<5%
Homeless	39%	22%	12%	23%	<5%
Military Connected	11%	17%	13%	45%	14%
Students w/ Disabilities	64%	20%	6%	9%	<5%

Source: NC Department of Public Instruction

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Additionally, the North Carolina Report Card system tracks suspensions and expulsions by subgroup. Cumberland County's suspension and expulsion data is shown below:

NC REPORT CARD – SUSPENSIONS & EXPULSIONS IN 2018

Suspensions and Expulsions (per 1000 Students in Subgroup)	Short-Term Suspensions	Long-Term Suspensions	Expulsions	In-School Suspensions
ALL	183.50	0.36	0.00	153.32
Female	113.14	0.24	0.00	105.44
Male	240.84	0.46	0.00	190.84
American Indian	177.69	0.00	0.00	132.30
Asian	41.62	0.00	0.00	46.12
Black	273.01	0.79	0.00	216.54
Hispanic	102.17	0.00	0.00	106.83
Pacific Islander	52.27	0.00	0.00	90.59
Two or More Races	162.15	0.00	0.00	127.82
White	82.54	0.00	0.00	78.33
Economically Disadvantaged	221.88	0.19	0.00	181.49
English Learners	75.36	0.00	0.00	71.03
Students w/ Disabilities	333.08	0.00	0.00	205.98

Source: NC Department of Public Instruction

The graduation rate for Cumberland County schools in the last year was 83%. In conjunction, the dropout rate increased to 14%.

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13. Section 3

HUD's definition of Section 3 is:

> *Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.*

The following are the guidelines that the City of Fayetteville's Department of Economic & Community Development uses to accomplish Section 3 compliance:

- Providing for the publication of a notice to low-income residents of the City of Fayetteville of employment, training, or contracting opportunities resulting from the expenditure of funding covered by Section 3.
- Entering the Section 3 Clause into all covered contracts funded with CDBG and HOME funds.
- Assisting and actively cooperating with HUD to ensure contractors and subcontractors comply with Section 3.
- Refraining from entering into contracts with contractors that are in violation of Section 3 regulations.
- Documenting actions taken to comply with Section 3 and submitting Section 3 summary reports.

During the preparation of this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on the HUD Section 3 Requirements.

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C. Private Sector

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental, or advertising of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibit such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, national origin, and sexual orientation.

EQUAL HOUSING OPPORTUNITY

1. Newspaper/Magazine Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or

discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols, or other approaches that are considered discriminatory.

Real estate advertisements were reviewed from several real estate publications, including *The Fayetteville Observer*. None of the advertisements in these publications contained language that prohibited occupancy by any protected class.

2. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/ and is included in Part VII, Appendix C of this Analysis of Impediments. This analysis uses 2018 HMDA data to identify any discriminatory lending patterns between minority and non-minority households. The following two (2) tables provide an analysis of the HMDA data in the Fayetteville, NC Metropolitan Statistical Area (MSA).

It should be noted that the HMDA data pertains to the entire Fayetteville MSA, which includes two (2) total counties (Cumberland County, NC and Hoke County, NC). While data for Cumberland County is highlighted where possible, there are many differences between the County and the surrounding county and municipalities that may provide some skewed outcomes.

The following table compares lending in Cumberland County to the Fayetteville, NC MSA. Lending in Cumberland County has been extracted from the MSA data based on census tract. Conventional loans in Cumberland County comprised 85.4% of the number of such loans in the MSA as a whole and 86.0% of the value of such loans.

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HMDA Data Analysis for 2018

	Home Purchase Loans							
	FHA, FSA / RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	$ Amount*	#	$ Amount*	#	$ Amount*	#	$ Amount*
Cumberland County	**4,100**	**707,830,000**	**1,936**	**236,220,000**	**4,053**	**554,755,000**	**671**	**39,275,000**
MSA/MD	5,150	899,690,000	2,268	274,780,000	4,766	671,870,000	752	43,740,000
% of metro area lending in Cumberland County	**79.6%**	**78.7%**	**85.4%**	**86.0%**	**85.0%**	**82.6%**	**89.2%**	**89.8%**

**Note: Amounts in thousands*
Source: https://www.ffiec.gov/hmda/

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The following table shows the conventional loan applications in **Cumberland County**. Approximately half (55.0%) of the loan applications in the County were originated, while nearly a fourth (23.2%) were denied and the other 16.8% were withdrawn and 2.7% were approved but not accepted. County applicants had a slightly lower origination rate and higher denial rate than the MSA as a whole, where 54.6% of all loans were originated, as well as 20.8% of denied applications.

Disposition of Conventional Loans

	Cumberland County		
	Count	% of Cumberland County Applications	% of Total MSA Applications
Loans Originated	**7,507**	55.0%	54.6%
Approved, Not Accepted	**359**	2.7%	2.6%
Applications Denied	**2,853**	23.2%	20.8%
Applications Withdrawn	**2,250**	16.8%	16.4%
File Closed for Incompleteness	**777**	5.7%	5.7%

Source: https://www.ffiec.gov/hmda/

The following table outlines the disposition of conventional loans in the **Fayetteville, NC MSA** by income level (data for only Cumberland County is not available). Loan applications from low-income households have the highest denial rates by a large margin, while upper-income households have the lowest denial rates and highest origination rates. The percentage of loans originated and percentage of applications denied are both correlated with income, whereas the higher the income level, the more likely the application will be approved and loan originated.

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Disposition of Conventional Loans by Income Level in the Fayetteville, NC MSA – 2018

	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
Income Level	Count	% of Total	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level
Less than 50% of MSA Median	**1,212**	**9.4%**	422	3.3%	34	0.2%	464	3.6%	175	1.4%	117	0.9%
50-79% of MSA Median	**1,898**	**14.7%**	926	0.4%	47	0.4%	508	3.9%	327	2.5%	90	0.7%
80-99% of MSA Median	**847**	**6.5%**	499	3.9%	23	0.2%	162	1.3%	135	1.0%	28	0.0%
100-119% of MSA Median	**2,680**	**20.7%**	1,549	3.6%	84	0.2%	510	3.9%	405	3.1%	349	1.0%
120% or More of MSA Median	**6,317**	**48.8%**	3,694	28.5%	128	1.0%	1,066	8.2%	1,080	8.3%	716	2.7%
Total	**12,954**	**100.0%**	**7,090**	**54.73%**	**316**	**2.4%**	**2,710**	**20.9%**	**2,122**	**16.4%**	**716**	**5.5%**

Source: https://www.ffiec.gov/hmda/

The following tables show the disposition of conventional loans disaggregated by minority status and income level for the **Fayetteville, NC MSA**. The number of applications for conventional loans submitted by White applicants outnumbers minority applicants in each income level analyzed. White applicants have a higher origination rate and lower denial rate of conventional loans than minority applicants in all income categories.

Loan Disposition Rates by Minority Status, Less than 50% of MSA Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	**26**	**2.15%**	6	1.42%	1	2.94%	14	3.02%	1	0.57%	4	3.42%
Asian	**27**	**2.23%**	8	1.90%	0	0.00%	11	2.37%	5	2.86%	3	2.56%
Black or African American	**412**	**33.99%**	137	32.46%	12	35.29%	175	37.72%	44	25.14%	44	37.61%
Native Hawaiian or Other Pacific Islander	**2**	**0.17%**	1	0.24%	0	0.00%	1	0.22%	0	0.00%	0	0.00%
White	**544**	**44.88%**	219	51.90%	16	47.06%	172	37.07%	92	52.57%	45	38.46%
Hispanic or Latino	**98**	**8.09%**	50	11.85%	3	8.82%	26	5.60%	14	8.00%	98	8.09%
Not Hispanic or Latino	**926**	**76.40%**	327	77.49%	25	73.53%	353	76.08%	129	73.71%	926	76.40%
Total	**1,212**	**100.00%**	**422**	**34.82%**	**34**	**2.81%**	**464**	**38.28%**	**175**	**14.44%**	**117**	**9.65%**

Source: https://www.ffiec.gov/hmda/

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The number of White, Non-Hispanic applicants, in this income category is higher than other applicant types. White, Non-Hispanic applicants have a higher origination rate than their population rate, and Black or African American residents have a higher denial rate than population rate with incomes less than 50% of the MSA median income.

Loan Disposition Rates by Minority Status, 50-79% of MSA Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	**42**	**2.21%**	19	2.05%	0	0.00%	11	2.17%	6	1.83%	6	6.67%
Asian	**49**	**2.58%**	21	2.27%	3	6.38%	21	4.13%	4	1.22%	0	0.00%
Black or African American	**599**	**31.56%**	257	27.75%	10	21.28%	196	38.58%	106	32.42%	30	33.33%
Native Hawaiian or Other Pacific Islander	**13**	**0.68%**	5	0.54%	0	0.00%	2	0.39%	5	1.53%	1	1.11%
White	**862**	**45.42%**	481	51.94%	23	48.94%	185	36.42%	142	43.43%	31	34.44%
Hispanic or Latino	**180**	**9.48%**	101	10.91%	6	12.77%	31	6.10%	36	11.01%	6	6.67%
Not Hispanic or Latino	**1,419**	**74.76%**	695	75.05%	29	61.70%	396	77.95%	236	72.17%	63	70.00%
Total	**1,898**	**100.00%**	**926**	**48.79%**	**47**	**2.48%**	**508**	**26.77%**	**327**	**17.23%**	**90**	**4.74%**

Source: https://www.ffiec.gov/hmda/

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The number of White, Non-Hispanic applicants, in this income category is higher than other applicant types. White, Non-Hispanic applicants have a higher origination rate than their population rate, and Black or African American residents have a much higher denial rate than population rate at this income level.

Loan Disposition Rates by Minority Status, 80-99% of MSA Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	**18**	**2.13%**	5	1.00%	1	4.35%	7	4.32%	4	2.96%	1	3.57%
Asian	**14**	**1.65%**	8	1.60%	0	0.00%	3	1.85%	3	2.22%	0	0.00%
Black or African American	**253**	**29.87%**	117	23.45%	5	21.74%	80	49.38%	43	31.85%	8	28.57%
Native Hawaiian or Other Pacific Islander	**8**	**0.94%**	6	1.20%	0	0.00%	1	0.62%	0	0.00%	1	3.57%
White	**437**	**51.59%**	292	58.52%	14	60.87%	51	31.48%	66	48.89%	14	50.00%
Hispanic or Latino	**87**	**10.27%**	64	12.83%	1	4.35%	9	5.56%	10	7.41%	3	10.71%
Not Hispanic or Latino	**664**	**78.39%**	379	75.95%	20	86.96%	135	83.33%	109	80.74%	21	75.00%
Total	**847**	**100.00%**	**499**	**58.91%**	**23**	**2.72%**	**162**	**19.13%**	**135**	**15.94%**	**28**	**3.31%**

Source: https://www.ffiec.gov/hmda/

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In the table below, the number of White, non-Hispanic applicants in this income category significantly outnumbers the number of minority applicants. All minority groups except for Hispanic or Latino households at this income bracket have higher denial rates and lower origination rates than their proportion of the population.

Loan Disposition Rates by Minority Status, 100-119% of MSA Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	**45**	**1.68%**	20	1.29%	1	1.19%	13	2.55%	4	0.99%	7	5.30%
Asian	**40**	**1.49%**	18	1.16%	1	1.19%	12	2.35%	6	1.48%	3	2.27%
Black or African American	**765**	**28.54%**	375	24.21%	20	23.81%	199	39.02%	128	31.60%	43	32.58%
Native Hawaiian or Other Pacific Islander	**13**	**0.49%**	6	0.39%	0	0.00%	3	0.59%	3	0.74%	1	0.76%
White	**1,379**	**51.46%**	889	57.39%	46	54.76%	192	37.65%	201	49.63%	51	38.64%
Hispanic or Latino	**248**	**9.25%**	154	9.94%	5	5.95%	43	8.43%	35	8.64%	11	8.33%
Not Hispanic or Latino	**2,036**	**75.97%**	1,187	76.63%	62	73.81%	377	73.92%	317	78.27%	93	70.45%
Total	**2,680**	**100.00%**	**1,549**	**57.80%**	**84**	**3.13%**	**510**	**19.03%**	**405**	**15.11%**	**132**	**4.93%**

Source: https://www.ffiec.gov/hmda/

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In the table below, the number of White, non-Hispanic upper-income applicants significantly outnumbers the number of minority applicants. In this income category, Black or African American and American Indian or Alaska Native applicants have a lower origination rate and a higher denial rate to white applicants.

Loan Disposition Rates by Minority Status, 120% or More of MSA Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	**61**	**0.97%**	30	0.81%	2	1.56%	14	1.31%	11	1.02%	4	1.15%
Asian	**126**	**1.99%**	80	2.17%	2	1.56%	12	1.13%	22	2.04%	10	2.87%
Black or African American	**1,643**	**26.01%**	831	22.50%	28	21.88%	381	35.74%	290	26.85%	113	32.38%
Native Hawaiian or Other Pacific Islander	**23**	**0.36%**	10	0.27%	0	0.00%	5	0.47%	7	0.65%	1	0.29%
White	**3,273**	**51.81%**	2,079	56.28%	74	57.81%	436	40.90%	533	49.35%	151	43.27%
Hispanic or Latino	**411**	**6.51%**	227	6.15%	7	5.47%	70	6.57%	82	7.59%	25	7.16%
Not Hispanic or Latino	**4,847**	**76.73%**	2,885	78.10%	99	77.34%	790	74.11%	810	75.00%	263	75.36%
Total	**6,317**	**100.00%**	**3,694**	**58.48%**	**128**	**2.03%**	**1,066**	**16.88%**	**1,080**	**17.10%**	**349**	**5.52%**

Source: https://www.ffiec.gov/hmda/

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In summary, the HMDA data shows that more than half (61.4%) of conventional loan applications in Cumberland County were originated, slightly less than a quarter (16.3%) were denied. City applicants had a slightly lower origination rate than that of Cumberland County, where 62.5% were originated and 15.1% were denied. Cumberland County's applications for mortgages made up the majority of applications in the Fayetteville, NC MSA, comprising 85.1% of all applications, loans originated and 84.7% of denied applications. More research should be conducted to determine the reasons that loans were denied and address the relevant issues in those areas. The following map shows all Census Tracts where mortgage applications were received in Cumberland County, and the rates at which those applications were denied.

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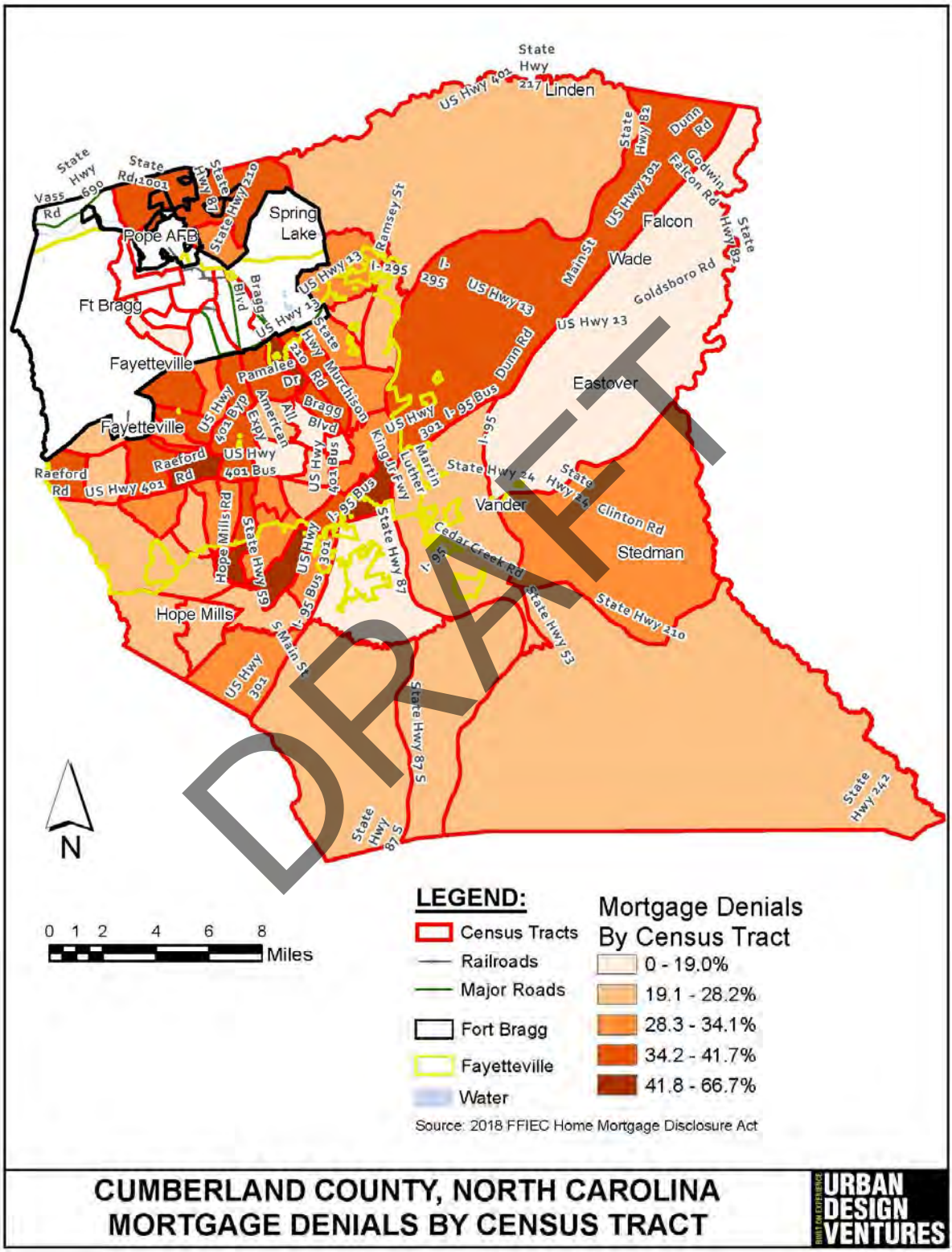
State Hwy 217
Linden
US Hwy 401
State Hwy 82
Dunn Rd
Godwin Falcon Rd
State Hwy 82
Falcon
US Hwy 301
Main St
Wade
Goldsboro Rd
US Hwy 13
Eastover
Dunn Rd
I-95 Bus
I-95
State Hwy 24
Vander
Clinton Rd
Stedman
Cedar Creek Rd
State Hwy 210
State Hwy 53
State Hwy 87 S
State Hwy 242
State Hwy 87 S
US Hwy 301
S Main St
Hope Mills
State Hwy 59
Hope Mills Rd
US Hwy 401 Bus
Raeford Rd
US Hwy 401
Fayetteville
US Hwy 401 Byp
American Expy
All American Fwy
Bragg Blvd
Pamalee Dr
State Hwy 210
Murchison Rd
Martin Luther King Jr Fwy
Ramsey St
Spring Lake
Pope AFB
State Rd 1001
State Hwy 87
State Hwy 690
Vass Rd
Ft Bragg
Bragg Blvd
US Hwy 13
I-295
N
0 1 2 4 6 8
Miles
LEGEND:
Census Tracts
Railroads
Major Roads
Fort Bragg
Fayetteville
Water
Mortgage Denials By Census Tract
0 - 19.0%
19.1 - 28.2%
28.3 - 34.1%
34.2 - 41.7%
41.8 - 66.7%
Source: 2018 FFIEC Home Mortgage Disclosure Act
CUMBERLAND COUNTY, NORTH CAROLINA
MORTGAGE DENIALS BY CENSUS TRACT
URBAN DESIGN VENTURES
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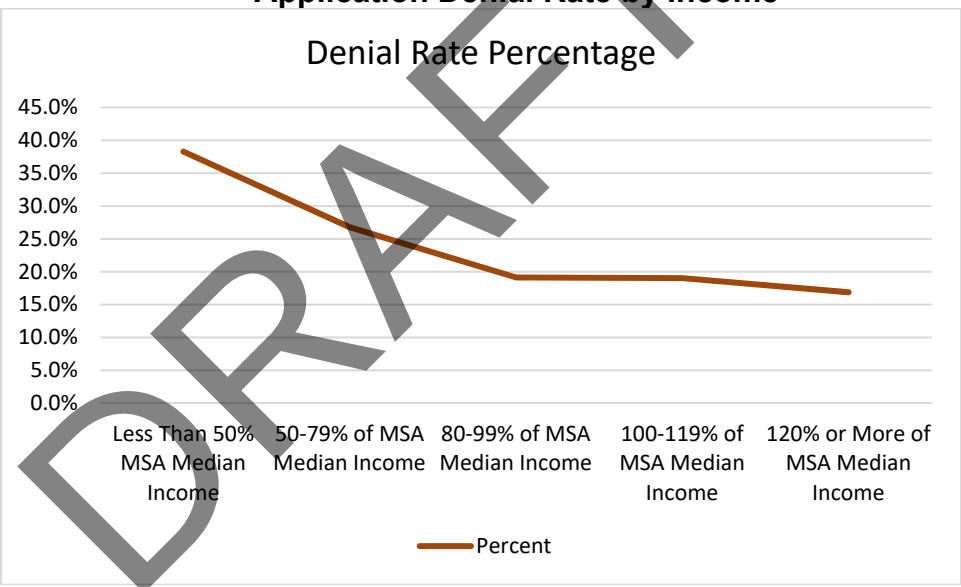
In the Fayetteville, NC MSA, the number of White applicants exceeds the number of minority applicants. Additionally, the origination rates are higher and denial rates lower for 'White' applicants than for 'Black or African American' in every income category. As incomes decrease, denial rates increase, often due to these applicants being first-time homebuyers with little to no collateral, poor credit history, and debt. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups because racist lending practices and redlining persist.



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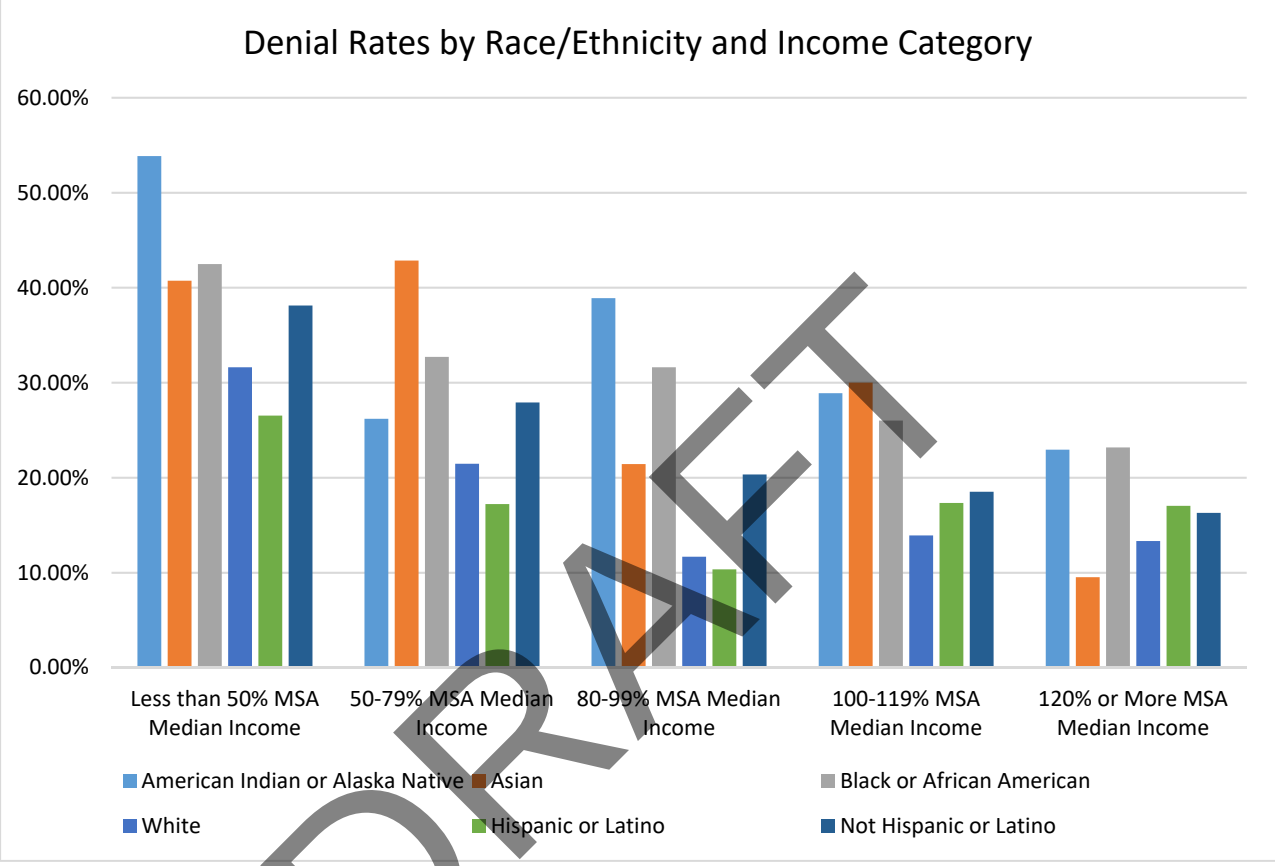
Source: https://www.ffiec.gov/hmda/

Conventional Loan Application
Denial Rate by Income and Race



Source: https://www.ffiec.gov/hmda/

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Based on this data analysis, there is the possibility that there are discriminatory lending practices in the MSA, as there are disparities between the origination and denial rates of minority and non-minority households. In every income category, White applicants have a higher loan origination rate and a lower denial rate than minority applicants. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

While this data provides an insight into lending patterns in the Fayetteville, NC MSA, it should be noted that data identifying race that is unique to the City level would yield more conclusive findings and provide a more accurate understanding of any existing lending issues in either City. However, this data is not available.

D. Citizen Participation

The City of Fayetteville's Department of Economic & Community Development and Cumberland County's Community Development Department undertook a broad participation strategy for this Analysis of Impediments to Fair Housing Choice to engage as many individuals, organizations, and agencies as possible.

Stakeholders: The City of Fayetteville and Cumberland developed a list of stakeholders with direct knowledge of, and experience in, the housing market and issues affecting fair housing. Identified stakeholders were divided into the following categories:

- City and County Departments
- Public Housing Authorities
- Faith-Based Organizations
- Direct Housing Stakeholders
- Social Service Providers
- Fair Housing Agencies
- Planning Organizations
- Banks/Mortgage Companies
- Workforce & Economic Development Organizations

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Agency/Organization/Stakeholder Meetings: The City of Fayetteville and Cumberland contacted all identified organizations and agencies to set up smaller meetings consisting of similar organizations to hold more in-depth conversations.

- Fayetteville-Cumberland Human Relations Commission – October 14, 2019 (Fayetteville City Offices)
- Fayetteville Metropolitan Housing Authority – October 15, 2019 (Fayetteville City Offices)
- Social Service Providers – October 15, 2019 (Fayetteville City Offices)
- Continuum of Care – October 15, 2019 (Cumberland County Offices)
- Cumberland County Department of Social Services – October 16, 2019 (Cumberland County Government Building)

- Cumberland County Public Health – October 16, 2019 (Cumberland County Government Building)
- Faith-Based Organizations – October 16, 2019 (Cumberland County Government Building)
- Housing Providers – October 16, 2019 (Fayetteville City Offices)
- Legal Aid – October 17, 2019 (Fayetteville City Offices)
- Economic Development Organizations – October 17, 2019 (Fayetteville City Offices)
- Council on Older Adults – October 17, 2019 (Fayetteville City Offices)

Any identified stakeholders that were not available to attend the meeting, as well as some of the aforementioned stakeholders, were then called to either (1) follow-up if they partook in either of the Community Meetings or (2) discuss fair housing issues with agencies/individuals who were unable to attend one of the Public Meetings.

Public Meetings: The City of Fayetteville and Cumberland County held two (2) Public Meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The First Public Meeting was held on Tuesday, October 15, 2019 at the Cliffdale Recreation Center and the Second Public Meeting was held on Thursday, October 17, 2019 at the Spring Lake Family Resource Center.

Additionally, the seventeen (17) scheduled meetings with various government staff, social service organizations, housing agencies, realtors, and banks were well-attended. Public Meetings were advertised in the "Fayetteville Observer," the largest English-language newspaper in circulation in the area.

- The City of Fayetteville and Cumberland emailed Public Meeting and Stakeholder Meeting invitations to:
  - Local housing authority
  - Advocacy organizations
  - Direct housing stakeholders
  - Social service providers
  - Economic Development Organizations
  - Educational agencies
  - Planning organizations
  - Faith-Based Organizations
  - Local fair housing advocacy organizations

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Additional Outreach: The City of Fayetteville and Cumberland County also employed the following to encourage extensive engagement and participation:

- Invitations to the stakeholder meetings were sent out by the Cities prior to the meetings (October 7th through October 11th).
- The City of Fayetteville and Cumberland County conducted a phone interviews with the Indian Housing Authority, who was unable to attend the public hearings or individual group meetings.

Resident Surveys: The survey was available online in both English and Spanish and physical copies were placed on public display to encourage resident input.

The online survey produced 170 English langue responses and 2 Spanish language responses. Actions to spread knowledge of the surveys included sending a press release advertising the survey, sending the survey to neighborhood organizations and associations for distribution, and emailing the link to interested parties. The information provided in these anonymous surveys were crucial in developing an accurate assessment of fair housing issues in the City and County.

The following is a summary of the 172 responses received:

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Notable Characteristics

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 67.44%.
- The majority (54.07%) of respondents are White, and one-third of respondents are Black or African American (30.23%).
- One-third of the respondents were over the age of 60 (32.56%). More than half of respondents were over the age of 50 (58.14%).
- Of those that answered the question, 19.77% were low- to moderate-income for their family size.
- Nearly half, at 49.42%, come from two person households.
- 66.28% are homeowners.
- 31.40% of respondents felt that residents of the County did not know how to report fair housing violations, and a further 37.21% were unsure whether residents know or do not know how to report violations.

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question.

Accessibility:

- 49.29% of respondents believe that there are is a need for curb and sidewalk improvements in the City and County.
- 7.00% believe there are not enough ramps leading to public facilities throughout the City and County.

Employment:

- 38.95% of respondents indicated that there are employment issues in the City and County.
- Of those that mention employment, 22.72% say there are jobs but the pay for them is too low.
- Of those that mention employment, 10.60% believe that there is a need for better education or training.

Housing:

- 41.86% said that there are housing issues within the City of Fayetteville and Cumberland County, and 29.17% of those respondents think affordability is the biggest issue.
- 12.50% believe there is a problem with the quality of rental housing.
- 31.43% cite property maintenance and blighted properties as an issue in their neighborhood.
- Other housing issues, needs, and programs include vacant housing, low-quality housing, and a need for housing for veterans.

Homelessness:

- 14.54% said that there is a need for services for the homeless in the City of Fayetteville and Cumberland County.
- 40% of those that mentioned homelessness described the need for more shelters.

Fair Housing:

- Only 12.21% of respondents are aware that residents can make reasonable housing accommodation requests to their landlords.
- 31.40% believed residents did not know who to contact, and 37.21% were unsure of who to contact.

Reasons Fair Housing Complaints Are Not Reported:

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- 6.98% specifically mention fear of retaliation, including eviction, legal reprisal, and poor retreatment.
- 14.53% point to a lack of knowledge in reporting practices as a cause.
- 45.35% of respondents did identify reasons that fair housing complaints were not reported.

Transportation:

- 6.97% of respondents stated that there are problems or issues with public transportation in Cumberland County.
- 25% of respondents believed that streets in the City needed to be addressed.

Other:

- 14.53% of respondents describe a need for greater health services, including mental health and addiction services.
- 27.91% of respondents believed that public safety was a concern in their neighborhood.

The following table illustrates the types of situations that may result in further discriminations and/or barriers to fair housing in the City of Fayetteville and Cumberland County:

Resident Survey Results

	Strongly Agree	Agree	Neutral / Unsure	Disagree	Strongly Disagree
Concentration of subsidized housing in certain neighborhoods	31.36%	29.66%	27.12%	7.63%	4.24%
Lack of affordable housing in certain areas	31.93%	38.66%	21.85%	3.36%	4.20%
Lack of accessible housing for persons with disabilities	24.37%	26.05%	40.34%	4.20%	5.04%
Lack of accessibility in neighborhoods (i.e. curb cuts)	21.01%	31.93%	29.41%	11.76%	5.88%
Lack of fair housing education	32.77%	32.77%	24.37%	7.56%	2.52%
Lack of fair housing organizations in the County	18.49%	26.89%	38.66%	10.08%	5.88%
State or local laws and policies that limit housing choice	14.41%	19.49%	49.15%	9.32%	7.63%

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Lack of knowledge among residents regarding fair housing	37.29%	30.51%	21.19%	8.47%	2.54%
Lack of knowledge among landlords and property managers regarding fair housing	19.33%	28.57%	30.25%	14.29%	7.56%
Lack of knowledge among real estate agents regarding fair housing	10.26%	29.91%	35.04%	17.09%	7.69%
Lack of knowledge among bankers/lenders regarding fair housing	12.93%	19.83%	37.93%	18.97%	10.34%
Other barriers	15.66%	14.46%	61.45%	6.02%	2.41%

Source: Citizen Survey

Additional Comments or Concerns:

Typical responses included:

- "[We need] More affordable housing. Households with two incomes can barely afford decent shelter. Access to Tiny Homes for single older adults, reasonably priced might be an answer."
- "More job training would be useful."
- "Residents lack knowledge as to how to dispose of bulk items and construction debris."
- "There should be a greater effort to stop littering in the city. And to remove the litter and keep our sidewalks and streets clean and beautiful."
- "More homeless rapid rehousing and prevention dollars are needed based on the VA programs to cover things as transportation cost, car repairs and other emergency housing needs."
- "Persons who do not have transportation, who have to walk have no place to safely walk. Students walking to school walk in bushes or the street. People in wheelchairs have to maneuver in the street."
- "So many children with special needs in the area! Need more developmental pediatricians, ABA therapists, and groups to support these kids and their parents."
- "We desperately need more mental health clinics and inpatient facilities."

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Public Meeting on the Draft AI Public Comments

The 2020-2024 Analysis of Impediments to Fair Housing Choice was made was made available on the City of Fayetteville's and Cumberland County's websites at https://fayettevillenc.gov/community/community-development, http://www.co.cumberland.nc.us/departments/community-development-group/community_development, and a hardcopy was placed at the following locations beginning on March 5, 2020:

- Economic & Community Development Office
  Festival Park
  225 Ray Avenue
  Fayetteville, NC 28301
- Fayetteville City Hall Foyer
  433 Hay Street
  Fayetteville, NC 28301
- Cumberland County Library Headquarters
  300 Maiden Lane
  Fayetteville, NC 28301
- Cliffdale Library
  6885 Cliffdale Lane
  Fayetteville, NC 28314
- Cliffdale Recreation Center
  6404 Cliffdale Road
  Fayetteville, NC 28314
- College Lakes Recreation Center
  4963 Rosehill Road
  Fayetteville, NC 28311
- Gilmore Recreation Center
  1600 Purdue Drive
  Fayetteville, NC 28303
- J.S. Spivey Recreation Center
  500 Fisher Road
  Fayetteville, NC 28301
- Kiwanis Recreation Center
  353 Devers Street
  Fayetteville, NC 28303
- Spring Lake Town Hall
  300 Ruth Street
  Spring Lake, NC
- Godwin Town Hall
  4924 Markham Street
  Godwin, NC
- Falcon Town Hall
  7156 South West Street
  Falcon, NC
- Stedman Town Hall
  5110 Front Street
  Stedman, NC
- Wade Town Hall
  7128 Main Street
  Wade, NC
- Linden Town Hall
  9456 Academy Street
  Linden, NC
- Hope Mills Town Hall
  5770 Rockfish Road
  Hope Mills, NC
- Eastover Town Hall
  3863 Dunn Road
  Eastover, NC
- Myers Recreation Center
  1018 Rochester Drive
  Fayetteville, NC 28305

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- Massey Hill Recreation Center
  1612 Camden Road
  Fayetteville, NC 28306

- Smith Recreation Center
  1520 Slater Avenue
  Fayetteville, NC 28301

- Old Wilmington Road
  Neighborhood Resource Center
  229 Lincoln Drive
  Fayetteville, NC 28301

- College Lakes Recreation Center
  4963 Rosehill Road
  Fayetteville, NC 28311
- Westover Recreation Center
  277 Bonanza Drive
  Fayetteville, NC 28303

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The document was on public display for a period of thirty (30) days. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments.

Based on the citizen participation process and fair housing analysis, the following fair housing issues were identified:

- **Housing Opportunities:**
  - There is a shortage of affordable housing in Fayetteville and Cumberland County that is decent, safe, and sanitary.
  - There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.
  - There is a shortage of affordable housing units in areas of opportunity where low-income persons and households may choose to move.
  - There are a number of mobile home parks in the City and County that vary in condition, with those in the poorest conditions becoming abandoned and should be removed.
  - There is enough vacant land for infill housing, but there is a lack of financial incentives to develop affordable housing on the vacant land by public, private, and non-profit developers.

- **Housing Choice:**
  - Housing units that are deteriorated and below code standards tend to be available at affordable rents.
  - Affordable housing units are concentrated in neighborhoods that are segregated by race or ethnicity, in addition to income.

- The special needs population in the City of Fayetteville and Cumberland County, has increased in the last 15 years, but landlords are frequently unwilling to make reasonable modifications and accommodations to their units.
- There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in the City of Fayetteville and Cumberland County.
- There is a lack of "mixed-income" housing being built in the County.
- There is a high demand for elderly housing in the County.

- **Cost Overburden:**
  - Lower household incomes create cost overburdened housing conditions; approximately 25.6% of homeowners and 47.8% of renters in the County are cost overburdened by 30% or more.
  - Wages in the City of Fayetteville have remained stagnant, contributing to the high number of cost overburdened renters and homeowners in the area.
  - The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.
  - Contingencies do not exist on investor-rehabilitated affordable housing, and investors do not want to maintain affordability.
- **Disability/Accessibility:**
  - There is a lack of housing in the County that is accessible and affordable for the elderly, the disabled, and persons with special needs.
  - The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the County that are for rent for persons with special needs.
- **Fair Housing:**
  - Tenants and homebuyers do not always file housing discrimination complaints when renting or buying a home.
  - Predatory loans in the region are common. As a result, foreclosure and eviction rates are high.
  - Eviction rates are high in the City and County, and landlords are permitted to evict tenants within 72 hours.
  - Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.

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  - There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.

- **Access/Mobility:**
  - The limited public transportation network in the County is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
  - Landlords will frequently refuse to make reasonable modifications and accommodations, and discriminate against elderly tenants.
  - Families and individuals have a right to live wherever they chose if affordable housing is available outside areas of concentration of low income or racial concentration.

Based on these findings, impediments to fair housing choice were outlined and are presented in Section V – Actions and Recommendations.

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V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the City of Fayetteville and Cumberland County to affirmatively further fair housing in the Region. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and some previously identified impediments to Fair Housing Choice are presented on the pages that follow. Of the previously identified impediments, racial segregation, a lack of accessible housing, and economic barriers for racial and ethnic minorities are still present in Cumberland County, despite the City's and County's best efforts. Based on economic conditions, these need to be continually addressed by the City of Fayetteville and Cumberland County.

Below is a list of impediments that were developed for the City of Fayetteville and Cumberland County for this shared 2020 Analysis of Impediments to Fair Housing Choice.

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A. Impediments to Fair Housing Choice

Using these findings, the City of Fayetteville and Cumberland County developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

- **Impediment 1: Fair Housing Education and Outreach**

There is a continuing need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

Goal: Improve the public's and local officials' knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing throughout the City of Fayetteville and Cumberland County.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **1-A:** Continue to promote Fair Housing awareness through the media, hosting seminars, and training to provide educational opportunities for all persons to learn about their rights under the Fair Housing Act and Americans with Disabilities Act.
- **1-B:** Continue to prepare and distribute literature and informational material concerning fair housing issues, an individual's housing rights, and a landlord's responsibilities to comply with the Fair Housing Act by making reasonable accommodations.
- **1-C:** Educate residents that they have the right to live outside concentrated areas of poverty.
- **1-D:** Work with the local Board of Realtors to educate and promote fair housing.
- **1-E:** Strive for better intergovernmental cooperation between state and local partners, as well as community groups, to effectively identify and address potential barriers to affordable housing choice.
- **1-F:** Publish forms, informational material, etc. in both English and Spanish.

- **Impediment 2: Quality of Rental Housing vs. Affordability**

The City of Fayetteville and Cumberland County have a large supply of rental housing that does not meet the minimum property standards and 35.9% of all households are cost overburdened and spend 30% or more of their monthly income on housing.

Goal: Increase the supply of decent, safe, sound and affordable rental housing through new construction and rehabilitation.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **2-A:** Provide funding and incentives for the rehabilitation of rental housing for low- and moderate-income renters.
- **2-B:** Continue to enforce local codes and ordinances, and develop a Rental Registry Program in the City of Fayetteville and Cumberland County.

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- **2-C:** Promote and encourage the Public Housing Authority to offer Section 8 Housing Choice Voucher holders the option to convert to homeownership.
- **2-D:** Continue to support Low Income Housing Tax Credits to develop decent, safe, sound and affordable rental housing.
- **2-E:** Target and rehabilitate rental housing in the Murchison Road Corridor and Shaw Heights Neighborhood Revitalization Strategy Areas.

- **Impediment 3: Lack of Quality Affordable Homeowner Housing**

There is a lack of housing resources for low- and moderate-income households to purchase a home. Many houses that are available for purchase are in need of substantial rehabilitation work.

Goal: Increase the supply of various types of affordable housing for sale through new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **3-A:** Financially support and assist low- and moderate-income households to purchase homes at affordable prices throughout Cumberland County.
- **3-B:** Support and promote the development of affordable infill housing on vacant land.
- **3-C:** Continue to fund and support homeowner rehabilitation and emergency repair programs.
- **3-D:** Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **3-E:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas that are not low-moderate income.
- **3-F:** Target and rehabilitate homeowner-occupied housing in the Murchison Road Corridor in Fayetteville the Shaw Heights in Cumberland County.

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- **Impediment 4: Continuing Need for Accessible Housing Units**

As an older built-up environment, there is a lack of accessible housing units in the City of Fayetteville and Cumberland County. 21.9% of the County's housing units (including the City of Fayetteville) were built over 60 years ago and do not have accessibility features, while 16.6% of the County's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **4-A:** Promote programs to increase the amount of accessible housing through rehabilitation of existing housing stock by homeowners and landlords.
- **4-B:** Encourage the development of new construction of accessible and visitable housing through financial or development incentives.
- **4-C:** Continue to enforce ADA and Fair Housing requirements for landlords to make "reasonable accommodations" for tenants who are disabled.
- **4-D:** Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

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- **Impediment 5: Economic Issues Affecting Housing Choice**

There is a lack of economic opportunities in the City of Fayetteville and Cumberland County which prevents low-income households from increasing their financial resources to be able to choose to live outside areas of concentrated poverty.

Goal: The local economy will continue to improve by providing new job opportunities, which will increase household income, and will promote fair housing choice.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **5-A:** Strengthen partnerships that enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- **5-B:** Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- **5-C:** Continue to support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income, and minority neighborhoods.
- **5-D:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- **5-E:** Support and enhance entrepreneurship training programs, with a particularly focus on programs that assist women, minority, and veteran-owned businesses.

- **Impediment 6: Impacted Areas of Concentration**

There are specific areas throughout the City of Fayetteville and Cumberland County where the concentration of low-income persons and minorities exceeds 70% of the area's population.

Goal: Promote the de-concentration of minorities outside the Central and Northern sections of the City of Fayetteville and areas of the County bordering Fort Bragg in order to reduce minority concentration.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the City of Fayetteville and Cumberland County:

- **6-A:** Support, promote, and plan for affordable housing developments outside areas of minority concentration.
- **6-B:** Market and promote housing opportunities for minorities outside areas of minority concentration.
- **6-C:** Provide assistance to minority households to locate their residences outside areas of high minority concentration.

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B. Activities and Recommendations to Affirmatively Further Fair Housing

To affirmatively further fair housing, the following actions have, and will be, implemented by the City of Fayetteville and Cumberland County through their Fair Housing Plan through various activities noted below:

1. The Fayetteville-Cumberland Human Relations Department serves all of Cumberland County in addressing Fair Housing Complaints. All municipalities within Cumberland County will continue to support the expansion of the capabilities of the Human Relations Department.
2. The Fayetteville-Cumberland Human Relations Department will continue to enforce fair housing through public education and outreach.
3. The communities need to continue to partner with NC Legal Aid to assist low income residents with free legal assistance to insure that they have a fair housing choice.
4. The City and County will continue to provide funds and information on where to report housing discrimination complaints.
5. The City and County will encourage testing and auditing of fair housing practices through its regional fair housing providers.
6. The Human Relations Department will continue to educate and attempt to overcome any remaining “Not in My Back Yard” attitudes in the area through its fair housing providers.
7. The City and County will continue to make every attempt to increase geographic choice in housing by providing informational links on their websites for low-income households to use.
8. The City of Fayetteville will pursue a Choice Neighborhood Initiative grant to construct affordable housing.
9. The Fayetteville-Cumberland Human Relations Department and Fayetteville Metropolitan Housing Authority will continue to promote integration of public housing.
10. The Fayetteville Metropolitan Housing Authority will promote Section 8 Voucher landlords to rent to residents outside racially and ethnically concentrated areas of poverty.
11. The City of Fayetteville and Cumberland County will continue to partner with their local developers and CHDOs to improve the quality of the affordable housing stock in the area for renters and homeowners.

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12. The communities will continue to promote economic development programs to assist in providing quality jobs to residents that will enable them to access more housing options.
13. On an annual basis, the City of Fayetteville and Cumberland County will continue to declare April to be Fair Housing Month via proclamation, in conjunction with holding an annual fair housing workshop with partners.
14. The Fayetteville-Cumberland Human Relations Department will continue to perform outreach to the public by providing updated housing discrimination information.
15. The City of Fayetteville and Cumberland County will continue to support housing rehabilitation problems to assist homeowners and renters in attaining safe, decent, affordable housing.
16. The Fayetteville-Cumberland Human Relations Department will continue to work with the North Carolina Human Relations Commission.

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VI. Certification

Signature Page:

I hereby certify that this 2020-2024 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant (CDBG) Program and HOME Investment Partnership (HOME) Program regulations.

City of Fayetteville, NC:

_____

Mitch Colvin, Mayor

_____

Date

Cumberland County, NC:

_____

W. Marshall Faircloth, Chairman of the Board of Commissioners

_____

Date

Fayetteville Metropolitan Housing Authority:

_____

Dawn Weeks, Executive Director

_____

Date

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