

A blue-tinted photograph of a residential street. In the foreground, a white picket fence runs along a sidewalk. Behind the fence, there are several houses. On the right, a two-story house with a porch is visible, featuring a house number '706' above the porch. The porch has white columns and a railing. To the left, another house is partially visible. The background is filled with trees and a clear sky.

**2019-2024**

**Analysis of Impediments to Fair  
Housing Choice**

City of Greensboro

**DECEMBER 2019**



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## Executive Summary

The City of Greensboro’s Neighborhood Development Department has completed this Draft 2019 Analysis of Impediments to Fair Housing Choice (AI) in conformance with the Affirmatively Furthering Fair Housing (AFFH) rule for HUD Community Planning and Development (CPD) funding recipients. The Department serves as the central coordinator of this document on behalf of the City of Greensboro, which receives several federal funding sources from HUD. More specific information on those sources and programs can be found in Chapter 1, Introduction.

The purpose of this document is to serve as a basis for fair housing planning with the central goal of increasing housing choice and identifying patterns of fair housing complaints. More specifically, the AI document provides key datapoints, including community input, to identify potential impediments to furthering fair housing and strategies to meet the following fair housing goals:

- Reduce segregation, and build on the nation’s increasing racial, geographic and economic diversity.
- Eliminate racially and ethnically concentrated areas of poverty.
- Reduce disparities in access to important community assets such as quality schools, job centers, and transit.
- Narrow gaps that leave families with children, people with disabilities, and people of different races, colors, and national origins with more severe housing problems, aka., disproportionate housing needs.

### Fair Housing Goals Addressed through the Analysis of Impediments Process





Expanding housing opportunities and choice requires action and engagement across all levels of a jurisdiction. In many cases, the impediments to fair housing choice identified may represent issues deeply rooted in historical or social circumstances that the City, or its various departments or programs, may not be able to directly address. As such, solutions to addressing potential impediments may be best resolved through a comprehensive approach involving local anchor institutions, community leaders, private market actors, other jurisdictions, and a set of programs that seek to address root causes of the impediments. The City of Greensboro, through the efforts of its Neighborhood Development Department and programs leveraging HUD funding, uses this AI process to ensure that it is able to take a meaningful role in affirmatively furthering fair housing choice for residents of the city.

The AI was developed in compliance with HUD requirements and the Department's Citizen Participation Plan. Extensive public input and consultation were garnered as further described in Chapter 2, Community Participation Process. The draft document has also been made available for public comment and is being presented to City Council. Only after opportunities for comment are provided and comments considered, will a final AI document be presented to City Council for consideration and final approval.

This AI both assesses where the city is as it relates to fair housing and identifies impediments and possible solutions where applicable. Chapter 1 provides a general description of the process and methodology for the document. Chapter 2 provides an overview of the Community Participation Process. Meanwhile, Chapter 3, 4, 5, and 6 lay the framework for fair housing conditions in the city, from a general socioeconomic profile of the city to segregation patterns, access to opportunity, and housing conditions. Chapter 7 describes the conditions of publicly supported housing in the city, while Chapter 8 narrows down the conditions for persons with disabilities. Finally, the document provides an overview of fair housing activities in Chapter 9 and identifies previous and current impediments in Chapter 10. The document finalizes by providing possible solutions and strategies the city may undertake to address the impediments identified in the process.

Through the identification of the factors that impact housing choice the City of Greensboro can determine what steps can be taken to attempt to mitigate those impediments. In developing the specific impediments for the draft AI, the City of Greensboro considered past impediments and whether they continued to exist, the trends and observations seen through the earlier chapters in this document, as well as new input received during the community engagement process. Because the issues addressed in past AIs were broad and pervasive, and continued to be reiterated and reaffirmed across many input sessions, the city does not consider those previous impediments to be resolved. However, based on newer insights and input those impediment statements have been revised to make them as current and concrete as possible to the context of today. To that end, the City of Greensboro has identified 10 impediments to fair housing choice that it will strive to address during the next five years. Those impediments, listed in summary form below, are expanded upon in Chapter 10.





*Summary of 2019 Impediments*

**Certain Zoning Standards**

Some zoning standards and requirements related to the location of social services, Single Room Occupancy (SRO) units, and manufactured homes may reduce access to housing opportunities.

**Reasonable Accommodation**

The lack of an official mechanism for reasonable accommodations to certain zoning ordinances, land use practices, general rules, practices or services to be formally requested or reviewed create an additional barrier for residents seeking such accommodations.

**NIMBYism**

Local pushback and potential rejection of multifamily developments and supportive housing for persons who are homeless or disabled in certain areas of the city is an ongoing challenge for Greensboro.

**Segregation**

Historic segregation patterns continue to hinder the location and expansion of affordable and supportive housing in areas of the city.

**Access to Adequate Housing**

Lack of sufficient production of affordable housing units and overall poor rental housing conditions limit mobility and housing choice for residents.

**Economic Stability**

Ensuring economic stability for residents experiencing high levels of cost burden.

**Immigrants and Refugees Needs**

Newly arrived immigrant and refugee communities face a complex array of housing challenges.

**Disability**

Persons with disabilities experience additional barriers in securing and maintaining adequate housing.

**Special Circumstances**

Barriers persist for residents facing special circumstances that limit mobility and housing choice.

**Supportive Housing**

Lack of efficient coordination and communication among supportive housing providers has eroded trust and quality of services to residents.



## Chapter 1. Introduction

Resources provided by the U.S. Department of Housing and Urban Development (HUD) come with the obligation to affirmatively further fair housing. This obligation generates from the Fair Housing Act of 1968, which gives HUD a lead role in administering the Fair Housing Act. In 2015, HUD finalized the Affirmatively Furthering Fair Housing (AFFH) rule requiring HUD Community Planning and Development (CPD) funding recipients to complete an Assessment of Fair Housing (AFH) using a HUD created tool. Because the tools required to be used by recipients of federal funds have still not been finalized by HUD, the City of Greensboro is to continue to affirmatively further fair housing and assess fair housing issues through the use of the regulation that pre-existed that rule. The pre-existing regulation requires the city to perform an Analysis of Impediments to Fair Housing Choice (AI).

In 2018, a Frequently Asked Questions (FAQ) document released by HUD affirmed what process should be followed by specifying that jurisdictions should conduct an AI within their area, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions, as was the process prior to the AFFH rule. As such, the City of Greensboro is maintaining its fair housing planning through the completion of this AI. The AI covers policies, practices, and procedures affecting housing choice for the city.

### City of Greensboro's Role

The Neighborhood Development Department of Greensboro administers the funds received from HUD to promote and leverage work related to areas ranging from homelessness to homeownership by providing programs such as down payment assistance, housing rehabilitation and commercial gap financing for below market rate housing development. The federal funding sources administered by Neighborhood Development include:

#### *Community Development Block Grant (CDBG)*

For more than 40 years, CDBG has provided local communities with an important source of funds to address affordable housing and community and economic development needs. The CDBG program provides grants to more than 1,200 local governments to create neighborhood approaches that improve the physical, economic, and social conditions in communities. Every dollar of CDBG funding leverages more than \$4 in other funding, bringing additional vital resources to communities.

#### *HOME Investment Partnership Program (HOME)*

For more than 20 years, the HOME program has helped communities provide access to affordable housing for low-income households. HOME provides grants to more than 600 local participating jurisdictions to create safe, sanitary, and affordable housing in communities nationwide. Greensboro's Neighborhood Development Department awards available funds through an application process for HOME-eligible projects for nonprofit and for-profit developers/agencies. All of these projects must be for HOME-eligible recipients. Every dollar of HOME funding leverages more than \$4 in other funding.

The City is the lead entity for the Greensboro/Burlington/Guilford County/Alamance County HOME Consortium. Each member of the HOME Consortium receives a percentage of the total annual HOME grant based on a formula from the US Department of Housing and Urban Development.

### *Emergency Solutions Grant (ESG)*

ESG provides funds for a variety of activities to address homelessness such as to:

- Engage homeless individuals and families living on the street
- Improve the number and quality of emergency shelters for homeless individuals and families
- Help operate these shelters, provide essential services to shelter residents
- Rapidly re-house homeless individuals and families
- Prevent families/individuals from becoming homeless
- Every dollar of ESG funding is equally matched in other funding.

### *Housing Opportunities for Persons with AIDS (HOPWA)*

The HOPWA program was established by the AIDS Housing Opportunity Act and remains the only federal housing program solely dedicated to providing rental housing assistance for persons and their families living with HIV/AIDS. HOPWA housing support enables these special-needs households to establish or maintain stable housing, reduce their risks of homelessness, and improve their access to health care and other support. Housing assistance provides the foundation from which these individuals and their families may participate in advances in HIV treatment and related care.

This document reflects the efforts and activities the City of Greensboro has undertaken through those programs, as well other as local initiatives and strategies.

### Definitions

According to HUD's Fair Housing Planning Guide<sup>1</sup>, "impediments to fair housing choice" are:

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

Further, there are three components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an "action, omission or decision."

Through the process noted above, some of the identified potential barriers or symptoms of barriers to housing choice may be linked to one or more protected classes or a particular action, omission, or decision.

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<sup>1</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity, Fair Housing Guide. Retrieved from: <https://www.hud.gov/sites/documents/FHFG.PDF>



Some potential barriers do not fall always within HUD’s definition of “impediment,” but have been noted in this document to provide context into current fair housing conditions in Greensboro.

### Data Sources

The primary data sources for this document are the U.S. Census Bureau’s five-year American Community Survey (2013-2017), the City of Greensboro’s *Data Book*, the U.S. Census Bureau’s 2010 Decennial Census, and HUD’s Comprehensive Housing Affordability Strategy Data (2011-2015). Whenever possible, citywide data is compared to county or metro area information.



## Chapter 2. Community Participation Process

### Community Engagement Overview

An important component of the background research for an Analysis of Impediments to Fair Housing Choice includes gathering input regarding fair and affordable housing conditions, perceptions, and needs in Greensboro. The city used several approaches to achieve meaningful public engagement with residents and other stakeholders, including a public meeting, interviews and a community-wide survey.

### Kickoff Meetings

On May 2019 a series of meetings were held in Greensboro, NC with key stakeholders and City of Greensboro staff to discuss current conditions, emerging trends, and key issues related to housing access in the area. These initial meetings helped frame the data sources and general trends to investigate in the initial drafting of this document.

### Public Meeting

The City of Greensboro advertised and held a general public meeting on Thursday August 1, 2019 at the Greensboro Public Library, Central Library-Tannenbaum Room, 219 N. Church St, Greensboro, NC 27401. The meeting consisted of a short presentation providing an overview of the Analysis of Impediments to Fair Housing Choice, fair housing law and ways to provide input for the study. The remainder of the meeting consisted of interactive discussion of fair housing neighborhood conditions, community resources and a mapping exercise. 24 people attended the public meeting.

### Stakeholder Interviews

In addition to the public meeting, one-on-one interviews were conducted over the phone and in-person with stakeholders and community members throughout the process. For example, interviews were held with stakeholders at Greensboro City Hall to discuss the intersection of open space, transportation, planning, and access to housing. In addition to such conversations, stakeholders representing various aspects of housing, including fair housing/legal advocacy, affordable housing, banking and lending, community development, immigrant and refugees, homeless service providers, business and economic development, and others were interviewed over the phone to solicit feedback on previous impediments and to identify current challenges in the jurisdiction.

### Stakeholder List

- The Homeless Union of Greensboro
- Greensboro Housing Coalition
- The Community Foundation of Greater Greensboro
- Center for New North Carolinians
- Greensboro Housing Authority
- Salvation Army
- Greensboro Urban Ministries
- Legal Aid of North Carolina
- Arc of Greensboro



City Departments

- City of Greensboro Planning Department
- City of Greensboro Parks and Recreation
- City of Greensboro Neighborhood Development
- City of Greensboro Fair Housing Division of the Human Relations Department

Community Survey

In addition to stakeholder engagement, as part of the community participation process of the Analysis of Impediments to Fair Housing Choice, the City of Greensboro hosted a 30-question online Community Needs Survey that was available from July 22, 2019 to August 16, 2019. The purpose of the survey was to obtain community input on housing and community needs in Greensboro. The survey was available online and in paper form in English and Spanish, and also available in paper form in Arabic. The survey received 450 total responses to the English version of the survey and one response to the Spanish version.

Respondents

Of the 451 respondents, 96 percent live in Greensboro. The majority of respondents live in one of eight zip codes listed below, with the largest number residing in 27410.

Zip Code	Number of Respondents
27401	50
27403	43
27405	51
27406	52
27407	52
27408	43
27410	72
27455	49

Respondents are largely female (70 percent), White (65 percent) and live in two-to-four-person households. 64 percent of respondents are employed at least part-time, 11 percent are retired, and 3 percent are students. Most respondents (59 percent) are homeowners, while 35 percent are renters.

Community Needs Survey Trends

- Perceptions of physical housing conditions are mixed.
  - 54 percent consider housing stable,
  - 31 percent felt it was declining, and
  - 15 percent think housing conditions are improving.
- A significant proportion of respondents (68 percent) think abandoned and foreclosed properties are a critical issue.
- Housing prices (61 percent) and public safety (45 percent) are the two most important reasons when considering a place to live.
- 48 percent felt the physical condition of the public space in their neighborhood was stable.
- 72 percent felt safe in their neighborhoods.





- 77 percent felt economic development and job creation were critical issues.
- Important considerations in choosing a place to live include diversity, neighborhood walkability, and sense of community.
- Survey respondents ranked the following community development priorities in the following order:
  1. Safe and Affordable Housing
  2. Community/Neighborhood Services
  3. Infrastructure (streets, sidewalks, parks)
  4. Economic Development
  5. Community/Neighborhood Facilities
- Survey respondents ranked the following top three highest public services needs in Greensboro:
  1. Fair Housing
  2. Homeless Services
  3. Health/Behavioral Services

### Access to Housing

- More than half (55 percent) of Greensboro survey participants are happy with their current living situation. For those who were not, “too expensive” was the primary reason, followed by lack of safety and poor housing conditions.
- Just under half of residents do not wish to move from their current living situation. The biggest impediment for those who would like to move but haven’t, is not being able to afford the move or the rent/mortgage anywhere else.
- 43 percent of respondents do not want to live in another part of Greensboro; those that would like to move cannot afford to live anywhere else.
- 20 percent of survey respondents have someone with a disability in the household.
- 15 percent of survey respondents reported being denied housing or facing housing discrimination in the past five years.
  - For those who were denied, the primary reason was not enough income.
  - For those who felt discriminated against, 75 percent did nothing about the discrimination and did not file a complaint.

### Public Hearing

The City of Greensboro Analysis of Impediments to Fair Housing was put forth at the City of Greensboro City Council meeting held October 15, 2019 in City Council Chambers (300 W Washington St, Greensboro, NC 27401). The meeting was open to the public. City of Greensboro City Council approved Resolution 19-0677 authorizing the submission of the 2019 Analysis of Impediments to Fair Housing Choice Report to the US Department of Housing and Urban Development. Meeting details can be found in Appendix A of the document.

### Public Comment Results

In accordance with the City of Greensboro’s Citizen Participation Plan and HUD requirements, a public comment draft of the Analysis of Impediments to Fair Housing document was made available for 30 days. The document was made available on the City of Greensboro’s website and in the Neighborhood Development Department’s office from October 15, 2019 through November 15, 2019.



The following table contains a summary of the public comments received during the period:

<b>Respondent</b>	<b>Comment</b>	<b>Response</b>
Greensboro Reginal REALTORS Association, Inc. (GRRRA)	GRRRA submitted a letter of support for the Analysis of Impediments to Fair Housing. Specifically, GRRRA commended the City of Greensboro in handling fair housing cases and noted the need for denser development and an increased supply more diverse and more affordable housing.	The City of Greensboro thanks GRRRA for the support and feedback on the Analysis of Impediments to Fair Housing document.
Resident	Resident commented that he has personally experienced a need for affordable housing for seniors.	The resident's comment supports the findings of the Analysis of Impediments to Fair Housing. Additionally, the Neighborhood Development Department has contacted the resident in response to his email.

Public comment notice and correspondence can be found in Appendix B of the document.



### Chapter 3. Socioeconomic Profile

The following analysis provides an overview of demographic trends in Greensboro and the Greensboro-High Point Metro Area with a focus on protected classes and patterns of segregation. The analysis provides background data on Greensboro in comparison to the surrounding area and demonstrates recent trends that inform the overall Analysis of Impediments to Fair Housing.

#### Population Growth

In 2017, the City of Greensboro’s population was approximately 285,000, representing an annual population increase of 1.1 percent from 2010. The Greensboro-High Point Metro Area grew 0.8 percent annually during the same period. Greensboro comprises 38 percent of the metro area, which had a population of 751,590 in 2017. According to estimates prepared by Esri, Greensboro is projected to continue grow at an annual growth rate of one percent, reaching 301,574 by the year 2023.

Table 1: Population Change					
	2010	2017	2023 Projections	2010-2017 Annual Growth Rate	2017-2023 Annual Growth Projections
Greensboro	263,358	284,816	301,574	1.1%	1.0%
Greensboro-High Point Metro Area	709,142	751,590	801,535	0.8%	1.1%

Sources: U.S. Census Bureau, 2006-2010 and 2013-2017 American Community Survey 5-Year Estimates. ESRI Forecast for 2023.

Census figures demonstrate that Greensboro’s population is getting older. The proportion of persons 45 to 85 years and older increased 2.8 percent between 2010 and 2017, while those 44 years and under decreased by 2.6 percent.

Table 2: Population Growth by Age Group, Greensboro				
Age Group	2010		2017	
	Estimate	Percent of Population	Estimate	Percent of Population
Total Population	263,358	(X)	284,816	(X)
Under 19 Years	71,431	27.1%	73,415	25.8%
20 to 24 Years	25,636	9.7%	24,387	8.6%
25 to 44 Years	75,089	28.5%	80,690	28.3%
45 to 64 Years	60,126	22.8%	68,506	24.1%
65 to 84 Years	26,832	10.2%	32,753	11.5%
85 Years and Older	4,244	1.6%	5,065	1.8%

Source: U.S. Census Bureau, 2006-2010 and 2013-2017 American Community Survey 5-Year Estimates



Additionally, Greensboro’s median age in 2017 was 35, while that of the Greensboro-High Point Metro Area was 38.8.<sup>2</sup> Esri population projections indicate the median age will increase to 35.9 in Greensboro and 40.2 in the metro area by 2023.

Income

Based on the 2017 American Community Survey data, the median household income of Greensboro was \$44,978 in 2017, slightly lower than that of the metro area (\$47,145). Median income increased 8.3 percent from \$41,530 in Greensboro and 8.1 percent from \$43,588 in the Greensboro-High Point Metro Area since 2010.<sup>3</sup>

Median Income by Household and Family Size

In Greensboro, median incomes for family households far exceed that of single person households. Family households all earn significantly higher than the median household income in Greensboro. Four-member family households are the highest earners, with a median income of \$69,000, while half of single person households earn below \$29,000. This low median income for single person households is an indicator of the need for additional affordable one-bedroom and studio housing in Greensboro.

**Table 3: Median Income by Household and Family Size in Greensboro, 2017**

Household Size	Median Income (dollars)
All Households	\$44,978
1-Person Households	\$29,096
All Families	\$57,271
2-Member Families	\$54,627
3-Member Families	\$58,456
4-Member Families	\$68,994
5-Member Families	\$53,118
6-Member Families	\$57,843
7+ Member Families	\$64,196

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

Table 4 shows the 2017 income distribution by household type in Greensboro. It should be noted that the number of households reflected for each income band is a discrete total, however the percentage of households and percent of families are not discrete to each income band but are cumulative so that each percentage shown reflects the percentage calculated based on the total households for that row plus all households from lower incomes as well.

While a significant proportion of households had incomes above \$50,000, 26.8 percent of households earned less than \$25,000 per year, 8.4 percent of which had incomes less than \$10,000. In terms of family households, 29.4 percent had incomes of less than \$35,000.

<sup>2</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

<sup>3</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates



**Table 4: Income by Household Type in Greensboro, 2017**

	<b>Households</b>	<b>Percent of Households at or Below Income Group</b>	<b>Families</b>	<b>Percent of Families at or Below Income Group</b>
Total Households	114,552	(X)	65,804	(X)
Less than \$10,000	9,679	8.4%	3,935	6.0%
\$10,000 to \$14,999	7,270	14.8%	2,887	10.4%
\$15,000 to \$24,999	13,752	26.8%	5,977	19.5%
\$25,000 to \$34,999	13,655	38.7%	6,559	29.4%
\$35,000 to \$49,999	18,119	54.5%	9,242	43.5%
\$50,000 to \$74,999	20,167	72.1%	12,654	62.7%
\$75,000 to \$99,999	12,254	82.8%	8,436	75.5%
\$100,000 to \$149,999	10,965	92.4%	8,702	88.7%
\$150,000 to \$199,999	4,116	96.0%	3,421	93.9%
\$200,000 or more	4,575	100.0%	3,991	100.0%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

**Area Median Family Income**

HUD sets maximum income limits that determine eligibility for its assisted housing programs including 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.

More than half (55.3 percent) of Greensboro’s households live below 100 percent of HUD’s Area Median Income (AMI). Of the 114,080 households reported, 45.2 percent are considered low income with incomes at or below 80 percent AMI and 26.1 percent are considered very low income with incomes at or below 50 percent AMI. More than one in ten Greensboro households is classified as extremely low income with incomes at 30 percent AMI or less.

Such data and analysis demonstrate the need for affordable units for low income, very low income, and extremely low-income households.

**Table 5: Area Median Income, Greensboro, 2015**

	<b>Household Count</b>	<b>Percent</b>
Total	114,080	(X)
0 to 30 percent AMI	15,365	13.5%
30 to 50 percent AMI	14,335	12.6%
50 to 80 percent AMI	21,785	19.1%
80 to 100 percent AMI	11,620	10.2%
> 100 percent AMI	50,975	44.7%

*Source: HUD Comprehensive Housing Affordability Strategy Data, 2011-2015*

## Chapter 4. Segregation & Integration

Communities across the country, including Greensboro, are experiencing various levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation are intertwined with inequality and lack of access to opportunity. Increased concentrations of poverty and segregation are often in the same neighborhoods that face unequal access to jobs, education, and other services, limiting fair housing choice.

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but often mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed such discriminatory housing practices but did not address the existing and ongoing root cause of segregation and inequalities. Over the years, the federal housing policies and programs, such as Section 8 and HOPE VI, have been implemented in an effort to alleviate the effects of residential segregation and reduce concentrations of poverty. Despite such efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on the residential patterns of communities, including Greensboro.

Historic development patterns and feedback from stakeholders and residents indicate that historic segregation patterns and practices continue to directly or indirectly determine housing choice and access in Greensboro. While addressing the root causes of such a legacy may not be feasible in the next five years, acknowledging that such historic patterns may have an impact on current and future community development and fair housing programs is important context for this analysis.

The following indicators provide insight into the segregation patterns across Greensboro. This analysis provided the basis for recommendations to address segregation and work to eliminate racially and ethnically concentrated areas of poverty.

### Racially and Ethnically Concentrated Areas of Poverty

R/ECAP areas are areas that have a non-White population of 50 percent or more and 40 percent or more of the population is in poverty, or the poverty rate is greater than three times the average poverty rate in the area. Based on 2010 Census data and HUD estimates, there were five R/ECAP areas in Greensboro, which was an increase from 2000 Census data and HUD estimates which listed three R/ECAP areas for the city. Based on the most current data, as of 2017, the number of R/ECAP areas increased to seven in the city.<sup>4</sup> The new R/ECAP areas correspond to Census Tracts 127.07, 127.06, and 127.05 in Eastern Greensboro. In the latest assessment, Census Tract 116.02, near Piedmont Heights, is no longer considered a R/ECAP area, as shown in the map below.

Though it is difficult to definitively discern all the dynamics causing the increase in R/ECAP areas in the jurisdiction, in general terms there appear to be two main forces contributing to the changes:

- 1) An increase in people below the poverty line moving to minority-majority areas already experiencing high concentrations of poverty; and

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<sup>4</sup> Estimates based on HUD's Affirmatively Furthering Fair Housing Mapping Tool and information provided by HUD's Office of Policy Development and Research <https://egis.hud.gov/affht/>

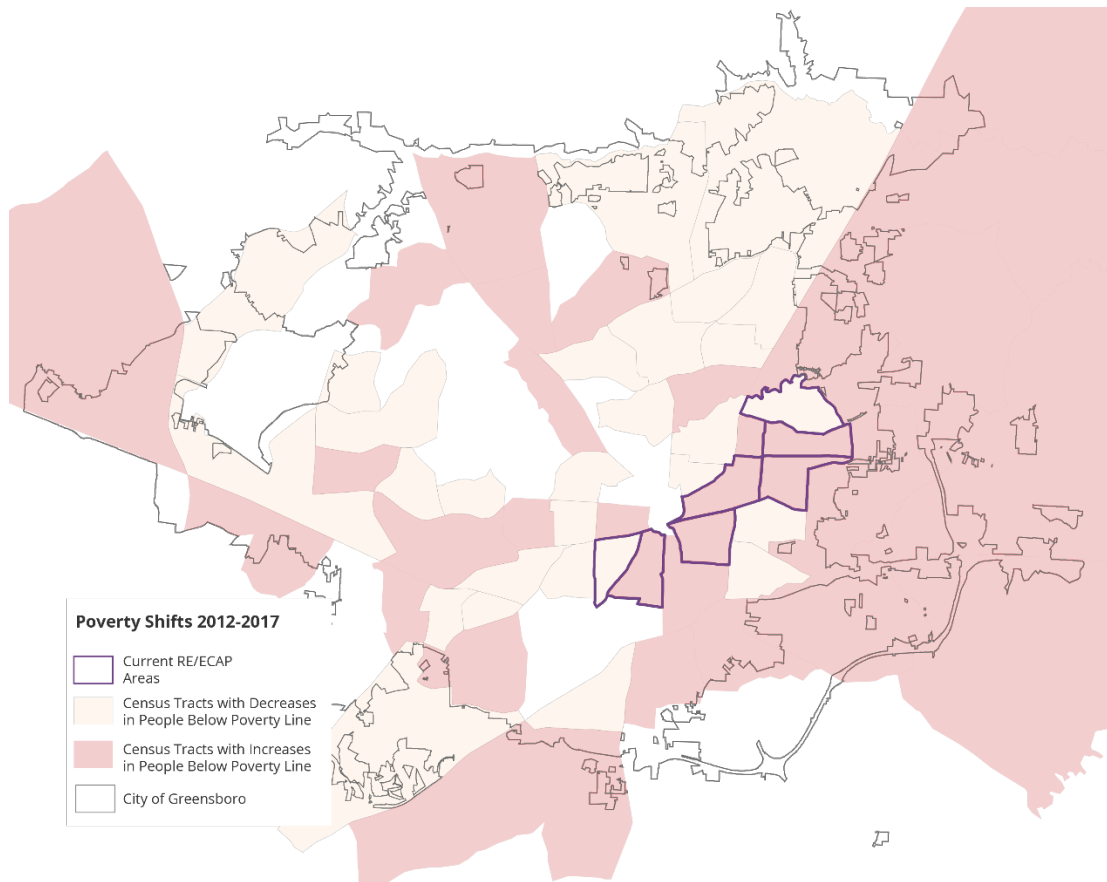


2) Movement of more affluent residents from areas that were at the cusp of being classified as R/ECAP areas into areas with higher access opportunity, thus resulting in higher concentrations of poverty in those areas.

As the figure below showcases, though the movement of people below the poverty line was dispersed throughout the City of Greensboro between 2012 and 2017, based on available Census data, the highest increases were seen in the peripheries of the jurisdiction and within R/ECAP areas. While those areas experienced *increases* in people below the poverty line, nearby Census tracts saw a *decrease* in people below the poverty line. Though the data does not show a one-to-one correlation, the general shift may signify a movement by persons below the poverty line into areas that remained (or were perceived to remain) affordable and accessible within the jurisdiction as they were pushed out of other areas of the city.

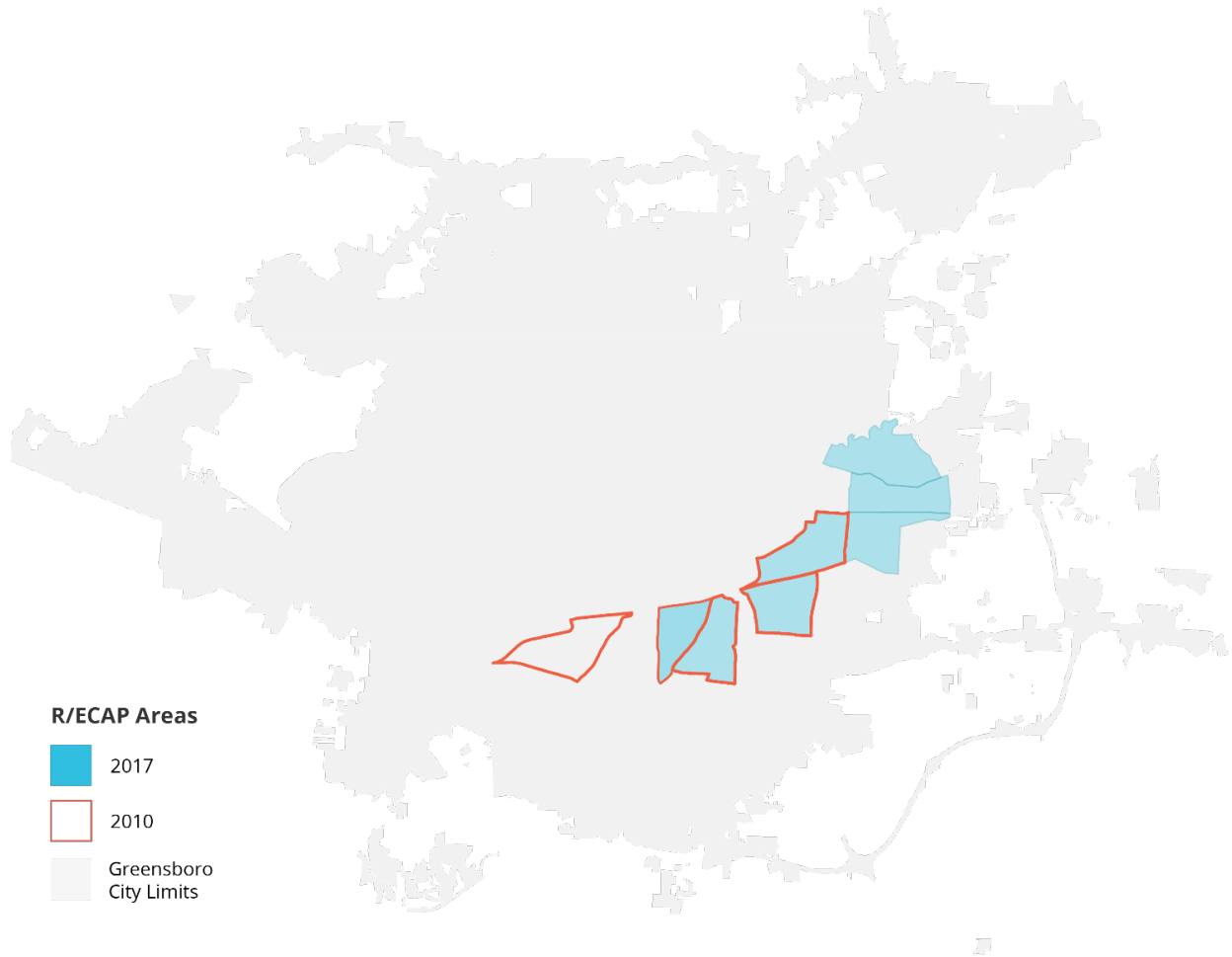
Though other forces were likely at play, such as the likely movement of people with the social and economic means into areas with greater access to opportunity, the shifts in nodal concentrations of poverty help explain some of the changes in R/ECAP areas outlined in this analysis.

Figure 1: Poverty Shifts in Greensboro, 2012-2017



Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, 2008-2012 American Community Survey 5-Year Estimates

**Figure 2: R/ECAP Areas 2010 and 2017, City of Greensboro**



*Source: U.S. Department of Housing and Urban Development, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), released 2017.*

As Table 6 highlights, R/ECAP areas are mostly comprised of non-Hispanic Black or African American populations within Greensboro (82.1 percent) and the metro area (70.8 percent). Non-Hispanic White populations are the second most populous racial or ethnic group within R/ECAP areas in both Greensboro and the metro area, comprising 8.6 percent and 14 percent respectively.

Approximately half of the families living within R/ECAP areas within Greensboro and the metro area have children.

In Greensboro, four percent of the population within a R/ECAP have a national origin outside of the United States. Those not from the United States in R/ECAP areas tend to originate from Mexico, west African countries, and Honduras. R/ECAP populations in the metro area comprise seven percent of non-United States nationals. These persons mostly originate from Mexico, Vietnam, and Thailand.



## City of Greensboro, Analysis of Impediments

**Table 6: R/ECAP Demographics**

R/ECAP Race/Ethnicity	Greensboro		Greensboro-High Point			
	#	%	#	%		
<b>Total Population in R/ECAPs</b>	<b>28,218</b>	-	<b>50,080</b>	-		
White, Non-Hispanic	2,413	8.6%	6,993	14.0%		
Black, Non-Hispanic	23,171	82.1%	35,455	70.8%		
Hispanic	1,662	5.9%	4,875	9.7%		
Asian or Pacific Islander, Non-Hispanic	232	0.8%	1,342	2.7%		
Native American, Non-Hispanic	133	0.5%	261	0.5%		
Other, Non-Hispanic	54	0.2%	123	0.3%		
<b>R/ECAP Family Type</b>						
Total Families in R/ECAPs	5,491	-	10,415	-		
Families with children	2,749	50.1%	5,272	50.6%		
<b>R/ECAP National Origin</b>						
Total Population in R/ECAPs	28,218	-	50,080	-		
#1 country of origin	Mexico	686	2.4%	Mexico	1,881	3.8%
#2 country of origin	Other Western Africa	123	0.4%	Vietnam	274	0.6%
#3 country of origin	Honduras	86	0.3%	Thailand	244	0.5%
#4 country of origin	India	75	0.3%	Burma	147	0.3%
#5 country of origin	El Salvador	58	0.2%	Other Middle Africa	146	0.3%
#6 country of origin	Other Central America	50	0.2%	El Salvador	139	0.3%
#7 country of origin	Sudan	49	0.2%	Sudan	133	0.3%
#8 country of origin	Other Western Asia	28	0.1%	Honduras	130	0.3%
#9 country of origin	Colombia	27	0.1%	Other Western Africa	123	0.3%
#10 country of origin	Trinidad & Tobago	26	0.1%	India	102	0.2%

Source: *Affirmatively Furthering Fair Housing Mapping Tool – Table 4, Version AFFHT0004*

Note: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level and are thus labeled separately.

1. Data Sources: Decennial Census; ACS

2. Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).



Greensboro has a diverse population where 44 percent are estimated to be non-Hispanic White; 41.4 percent non-Hispanic Black or African American; and 7.3 percent Hispanic or Latino. The Greensboro-High Point Metro Area is not as diverse as Greensboro itself, with a population that is estimated to be 59.4 percent non-Hispanic White; 26.3 percent non-Hispanic Black or African American; and 8.1 percent Hispanic.

**Table 6: Race and Ethnicity**

	Greensboro		Greensboro-High Point Metro Area	
	2017 Estimate	Percent of Population	2017 Estimate	Percent of Population
Total Population	284,816	(X)	751,590	(X)
Not Hispanic or Latino	264,162	92.7%	690,352	91.9%
White alone	125,177	44.0%	446,335	59.4%
Black or African American alone	117,957	41.4%	197,558	26.3%
American Indian and Alaska Native alone	989	0.3%	2,664	0.4%
Asian alone	12,641	4.4%	26,740	3.6%
Native Hawaiian and Other Pacific Islander alone	167	0.1%	283	0.0%
Some other race alone	1,144	0.4%	2,673	0.4%
Two or more races	6,087	2.1%	14,099	1.9%
Hispanic or Latino	20,654	7.3%	61,238	8.1%
White alone	11,556	4.1%	34,424	4.6%
Black or African American alone	1,176	0.4%	2,897	0.4%
American Indian and Alaska Native alone	208	0.1%	659	0.1%
Asian alone	0	0.0%	130	0.0%
Native Hawaiian and Other Pacific Islander alone	88	0.0%	143	0.0%
Some other race alone	6,630	2.3%	20,703	2.8%
Two or more races	996	0.3%	2,282	0.3%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

Between 2010 and 2017, Greensboro saw a slight decrease in the non-Hispanic White population and an increase in non-White populations. The White population decreased by less than one percent, while non-White populations, including Black or African American, Asian, and Hispanic populations each increased over 10 percent. Asian and Black or African American populations saw the most significant increases of 18.8 percent and 16.1 percent respectively, while the Hispanic population increased from 18,486 persons to 20,654 persons (11.7 percent).

Overall, the Metro Area saw similar trends where the non-Hispanic White population saw minimal decrease by 0.6 percent between 2010 and 2017 and an overall increase in non-White populations. Similar to Greensboro, Asian, Hispanic and Black or African American populations had significant increases.

<b>Table 7: Race and Ethnicity Percent Change</b>						
	<b>Greensboro</b>			<b>Greensboro-High Point Metro Area</b>		
	<b>2010 Estimate</b>	<b>2017 Estimate</b>	<b>2010-2017 Percent Change</b>	<b>2010 Estimate</b>	<b>2017 Estimate</b>	<b>2010-2017 Percent Change</b>
Total population	263,358	284,816	8.1%	709,142	751,590	6.0%
Not Hispanic or Latino	244,872	264,162	7.9%	659,166	690,352	4.7%
White alone	126,278	125,177	-0.9%	448,879	446,335	-0.6%
Black or African American alone	101,643	117,957	16.1%	176,592	197,558	11.9%
American Indian and Alaska Native alone	1,098	989	-9.9%	2,913	2,664	-8.5%
Asian alone	10,645	12,641	18.8%	19,864	26,740	34.6%
Native Hawaiian and Other Pacific Islander alone	24	167	595.8%	59	283	379.7%
Some other race alone	899	167	27.3%	1,535	2,673	74.1%
Two or more races:	4,285	6,087	42.1%	9,324	14,099	51.2%
Hispanic or Latino	18,486	20,654	11.7%	49,976	61,238	22.5%

*Source: U.S. Census Bureau, 2006-2010 and 2013-2017 American Community Survey 5-Year Estimates*

### Segregation Levels

The dissimilarity index is a commonly used measure of community level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. Index values range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question and a value of 100 representing perfect segregation between the racial groups. In general, less than 40 represents low segregation, between 40-54 represents moderate segregation and greater than 55 represents high segregation.<sup>5</sup>

The dissimilarity index trend in Greensboro indicates that segregation between the non-White and White population is declining overall across the city, though historical segregation continues to drive certain pockets of minority concentrations in parts of the city. From 1990 to 2010, Black or African American and White residents had the highest rates of segregation compared to other racial and ethnic groups. Although Black or African American and White residents continued to have the highest rates of segregation, separation between these groups has dropped from high to moderate between 2000 and 2010.

In 2010, segregation rates between White residents and Asian or Pacific Islander residents were lowest when compared to other racial and ethnic groups, followed by White and Hispanic residents. However, segregation between these groups actually increased when compared to 2000 and 1990 indices. This

<sup>5</sup> [AFFH Data Documentation Draft, June 2013 https://www.huduser.gov/portal/publications/pdf/FR-5173-P-01\\_AFFH\\_data\\_documentation.pdf](https://www.huduser.gov/portal/publications/pdf/FR-5173-P-01_AFFH_data_documentation.pdf)

increase in segregation may reflect the growing number of Asian or Pacific Islander and Hispanic residents in Greensboro and the region over the past twenty years.

Similar patterns of segregation were seen in the metro area. Segregation between non-White and White residents decreased from 1990 to 2010. However, patterns of segregation patterns have either stayed stable or slightly increased when examining the relationship between specific races and ethnicities. In 2010, segregation was lowest between White residents and Hispanic or Latino residents.

**Table 8: Racial/Ethnic Dissimilarity Index**

Racial/Ethnic Dissimilarity Index	Greensboro			Greensboro-High Point Metro Area		
	1990	2000	2010	1990	2000	2010
Non-White/White	55.73	51.15	50.38	50.93	48.02	47.23
Black/White	59.51	55.27	54.01	54.12	53.42	54.07
Hispanic/White	22.38	44.19	47.02	24.47	44.27	41.07
Asian or Pacific Islander/White	27.10	36.63	35.20	43.62	46.77	45.62

*Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 18, Version AFFHT0004*

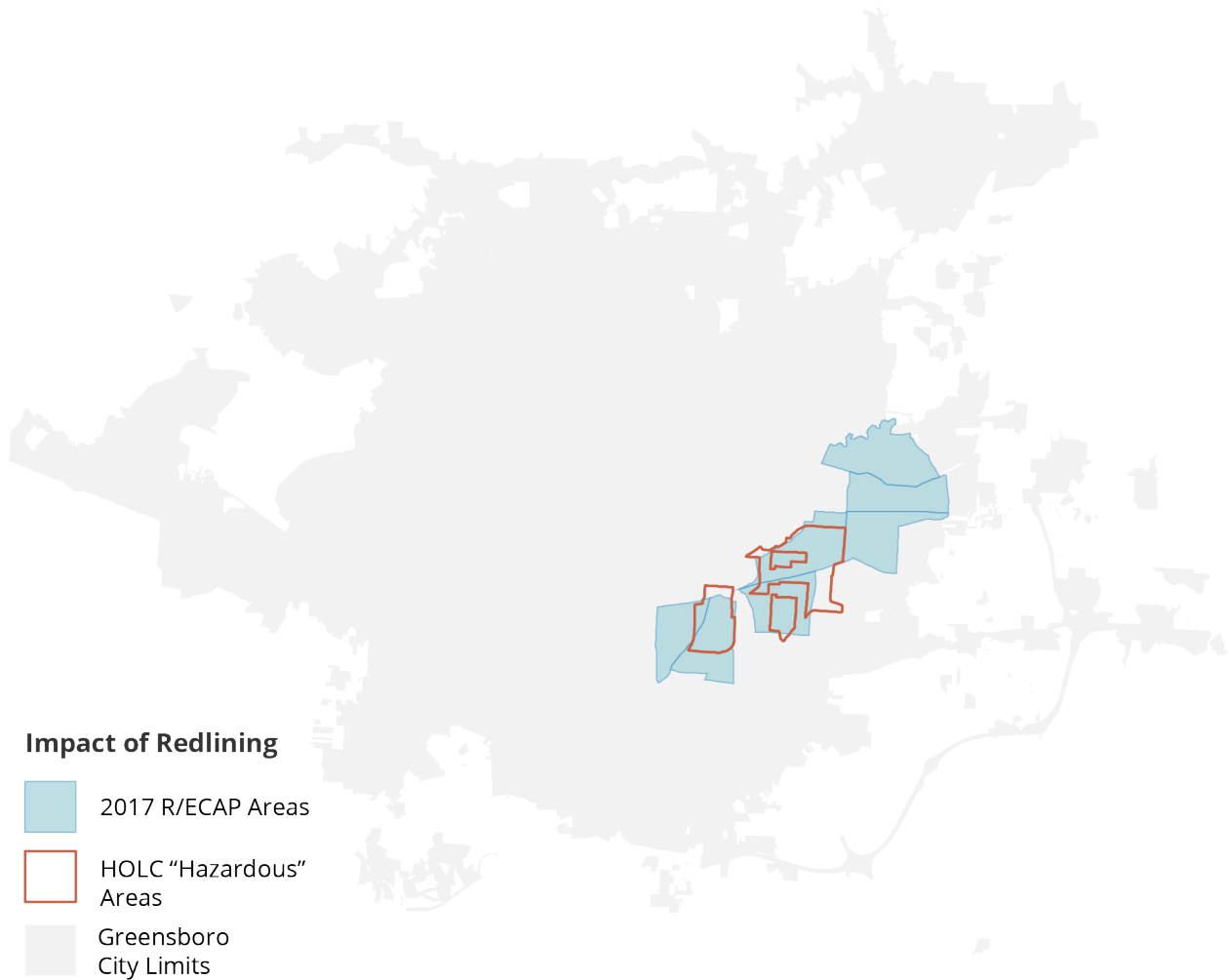
In the last five years, the City of Greensboro has provided an array of programs aimed at helping low income and minority residents have greater access to economic opportunities and to lessen the impact of historical segregation patterns. Moving forward, such efforts should continue to address potential segregation patterns in the city and to lessen the gap in accessing opportunities for all residents in the area.

### Historic Segregation

In addition to current segregation levels, historic segregation continues to impact fair housing choice and existing segregation patterns. For example, racial discrimination in mortgage lending in the 1930s can be directly linked to demographic and wealth patterns of communities across the country, including Greensboro. As Figure 3 shows, areas deemed by the Home Owners' Loan Corporation (HOLC) as "Hazardous" in the 1930s correspond closely to current R/ECAP areas of the city. Almost a century ago, "Hazardous" areas were marked in red by HOLC to demarcate areas where the majority of African-Americans resided and where lenders were instructed to discourage or outright refuse all home lending activity. As decades went by, the Federal Housing Administration institutionalized the system of discriminatory lending in government-backed mortgages, reflecting local race-based criteria in their underwriting practices and reinforcing residential segregation in cities such as Greensboro. The discriminatory practices captured by the HOLC maps continued until 1968, when the Fair Housing Act banned racial discrimination in housing. Yet, as the correlation with current R/ECAP areas demonstrate, the lingering impact and patterns of economic and racial residential segregation are still evident today. While addressing or resolving such historic segregation and epochs of racial tension may be beyond the timeline and scope of this document, underscoring its relevance to fair housing choice and the perceptions of modern-day residents remains critical in understanding current and future impediments to fair housing in the area.



**Figure 3: Legacy of Redlining, City of Greensboro**



*Source: Mapping Inequality, University of Richmond; 2017 Department of Housing and Urban Development racially/ethnically concentrated areas of poverty (R/ECAPs).*

### National Origin and Limited English Proficiency Population

While persons with a limited ability to read, write, speak or understand English (LEP) are not protected under the Fair Housing Act, using LEP as a pretext for discrimination or using LEP that causes an unjustified discriminatory effect is prohibited.<sup>6</sup>

Table 9 demonstrates, 2.5 percent of households in Greensboro are LEP, most of which are Spanish speaking households. However, among non-English speaking households, Asian and Pacific Island language households have the highest proportion of households that are LEP at 24.2 percent.

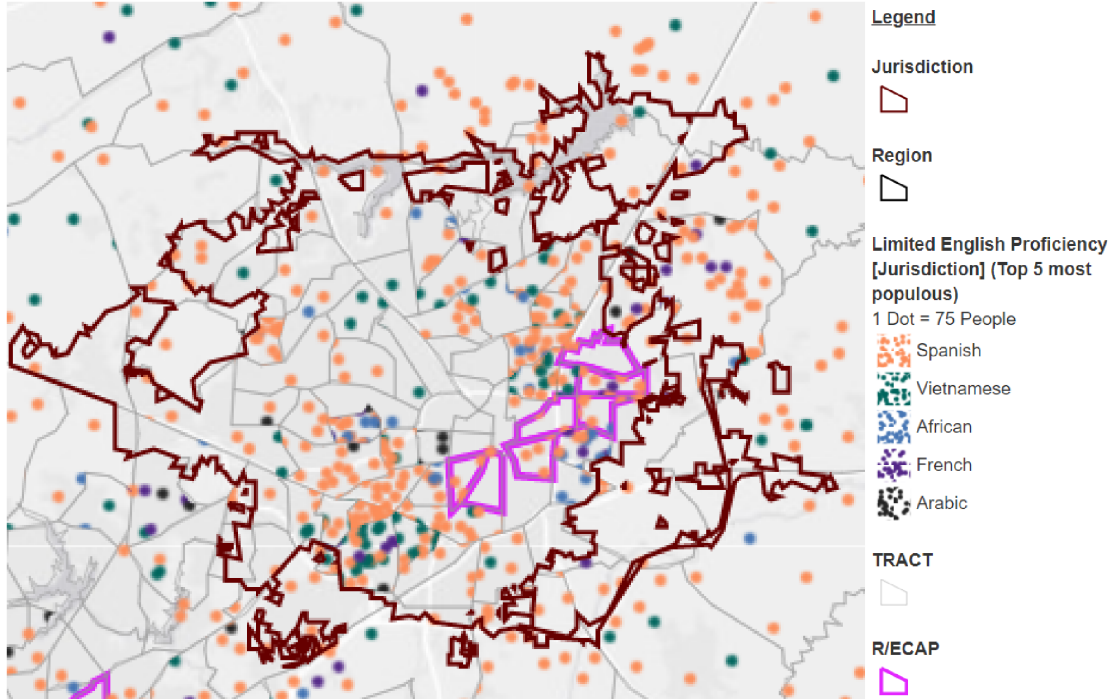
<sup>6</sup> U.S. Department of Housing and Urban Development Office of General Counsel Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency <https://archives.hud.gov/news/2016/pr16-135-lepmemo091516.pdf>

Table 9: Limited English Proficiency, Greensboro, 2017			
	Total	Limited-English Speaking	Percent Limited English Speaking
All Households	114,552	2,872	2.5%
Spanish Speaking Households	6,178	1,324	21.4%
Other Indo-European Languages	3,126	436	13.9%
Asian and Pacific Island Languages	2,811	679	24.2%
Other Languages	1,865	433	23.2%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Identifying potential connections between LEP communities and other elements impacting fair housing choice, such as poverty, income, and general access and location to housing, remains important for Greensboro. Though a clear connection between such elements cannot be readily made at the moment, as current research by The Center for New North Carolinians shown on the connection between health and immigrant communications<sup>7</sup>, a correlation between housing, LEP communities, and immigrants is worth considering as a potential compounded barrier to fair housing access in the long term as programs and outreach efforts are developed.

Figure 4: LEP Communities, City of Greensboro



Source: Affirmatively Furthering Fair Housing Tool – Map 4-LEP Persons-AFFHT0004, released 2017

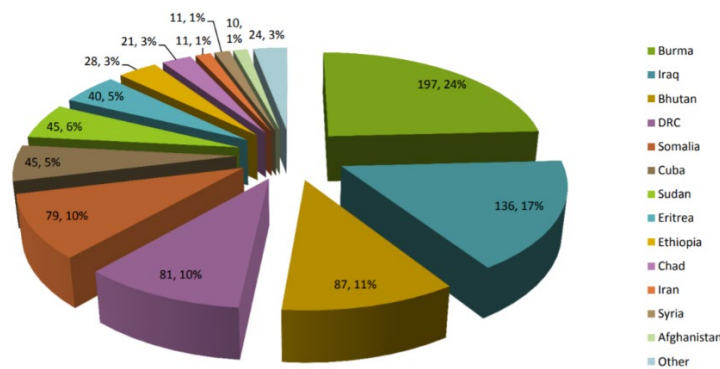
<sup>7</sup> North Carolina Medical Journal Special Edition on Immigrants and Health <http://www.ncmedicaljournal.com/content/80/2.toc>

## Refugees

According to research by The Center for New North Carolinians<sup>8</sup>, there are over 120 first languages and 140 countries of origin represented in the Guilford County School System. In the last decade, new emerging languages in the Guilford County Schools have come from new refugee groups that include Burmese and other tribal languages from Burma/Myanmar and the Nepali language from the new groups of ethnic Nepali refugees from Bhutan.

New residents with refugee status are often war victims who are eligible for certain public services and assistance that aids them in the initial resettlement process. Yet, based on stakeholder feedback and noted cases documented in the city during the last few years, such as an apartment fire in Summit Avenue<sup>9</sup>, the refugee population of Greensboro faces acute fair housing problems, such as unsafe living conditions and discriminatory landlord actions, that are not always addressed or known in the formal process until it is too late. Understanding, reviewing, and addressing such concerns through program updates and new citywide cross-departmental initiatives will ensure that such potential problems are addressed early on.

**Figure 5: 2014 Refugee Arrivals by Country, Guilford County**



Source: *Refugee Arrivals by Country of Origin FY 2014*, The Center for New North Carolinians

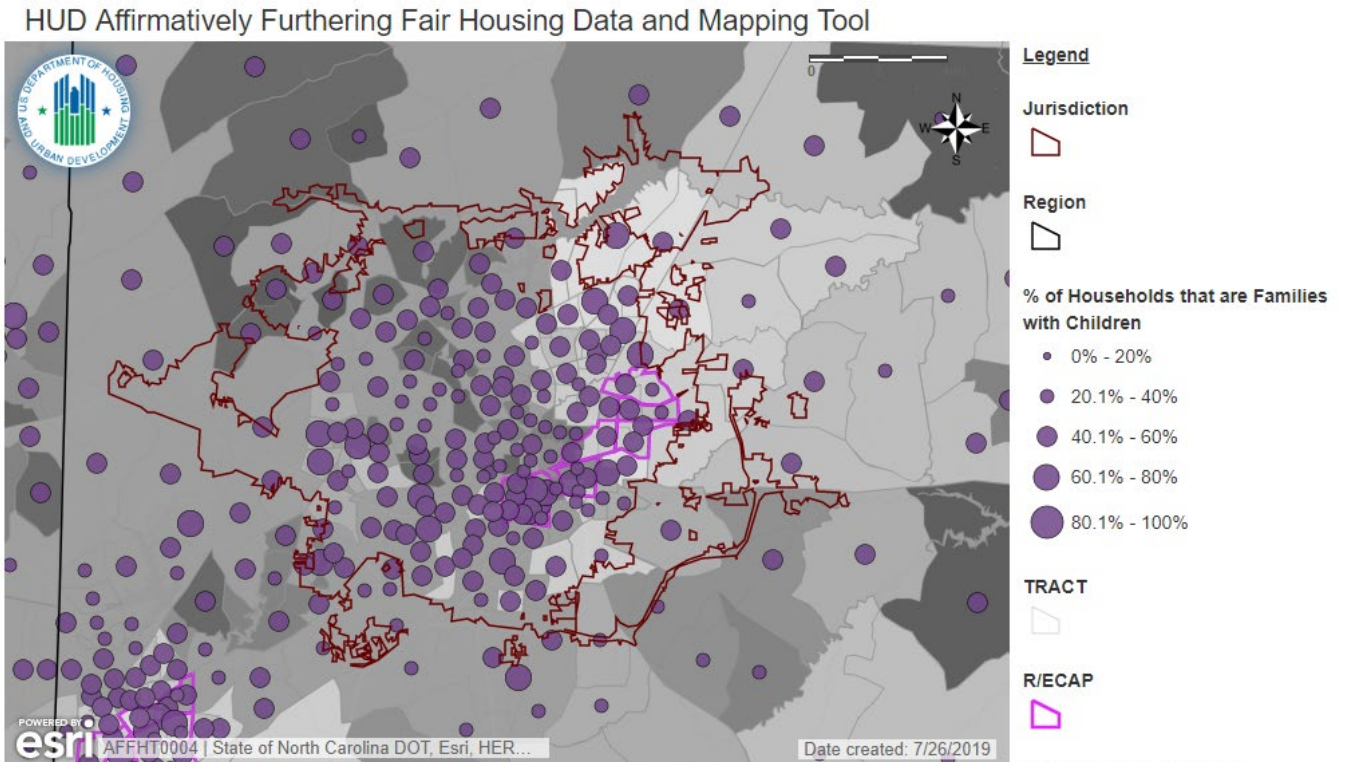
## Families with Children

Figure 6 below shows the distribution of households with children throughout Greensboro. Generally, these households are geographically widely distributed throughout the city, with some concentration in the south-central census tracts. These south-central tracts with concentrations of households with children are also racially concentrated areas of poverty (R/ECAP areas). Potential program changes should ensure that families with children within those areas and beyond continue to have access to adequate housing.

<sup>8</sup> Overview of Immigrant Demographics in Guilford County <https://cnc.uncg.edu/immigrant-demographics-of-guilford-county/>

<sup>9</sup> "Greensboro Apartment Fire: 5 Children Dead, Smoke Detectors Not Working, Other Facts," WFMY News. <https://www.wfmynews2.com/article/news/local/greensboro-apartment-fire-5-children-dead-smoke-detectors-not-working-other-facts/83-551924365>

**Figure 6: Percent of Households that are Families with Children**



Source: Affirmatively Furthering Fair Housing Tool – Map 7-Demographics and School Proficiency-AFFHT0004, released 2017

## Chapter 5. Access to Opportunity

Access to quality schools, employment opportunities, reliable transportation, and safe healthy neighborhoods have a positive impact on the well-being of residents. The following analysis examines opportunity indicators that seek to provide insight into the economic and educational opportunities as well as environmental health within a community with the ultimate goal of identifying strategies to improve access to community assets.

### HUD-Defined Opportunity Factors

HUD has developed a series of indices to help inform communities about segregation in the jurisdiction and region, as well as about disparities in access to opportunity. The following provides definitions of each opportunity indicator:

- **Low Poverty Index** – Low Poverty Index captures poverty in a given neighborhood. Values range from 0 to 100. The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index** - The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index** - The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Values range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Index** – This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). Values range from 0 to 100. The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index** – This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. CBSA). Values range from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index** – The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. Values range from 0 to 100. The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index** – The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. Values range from 0 to 100. The higher the index value, the

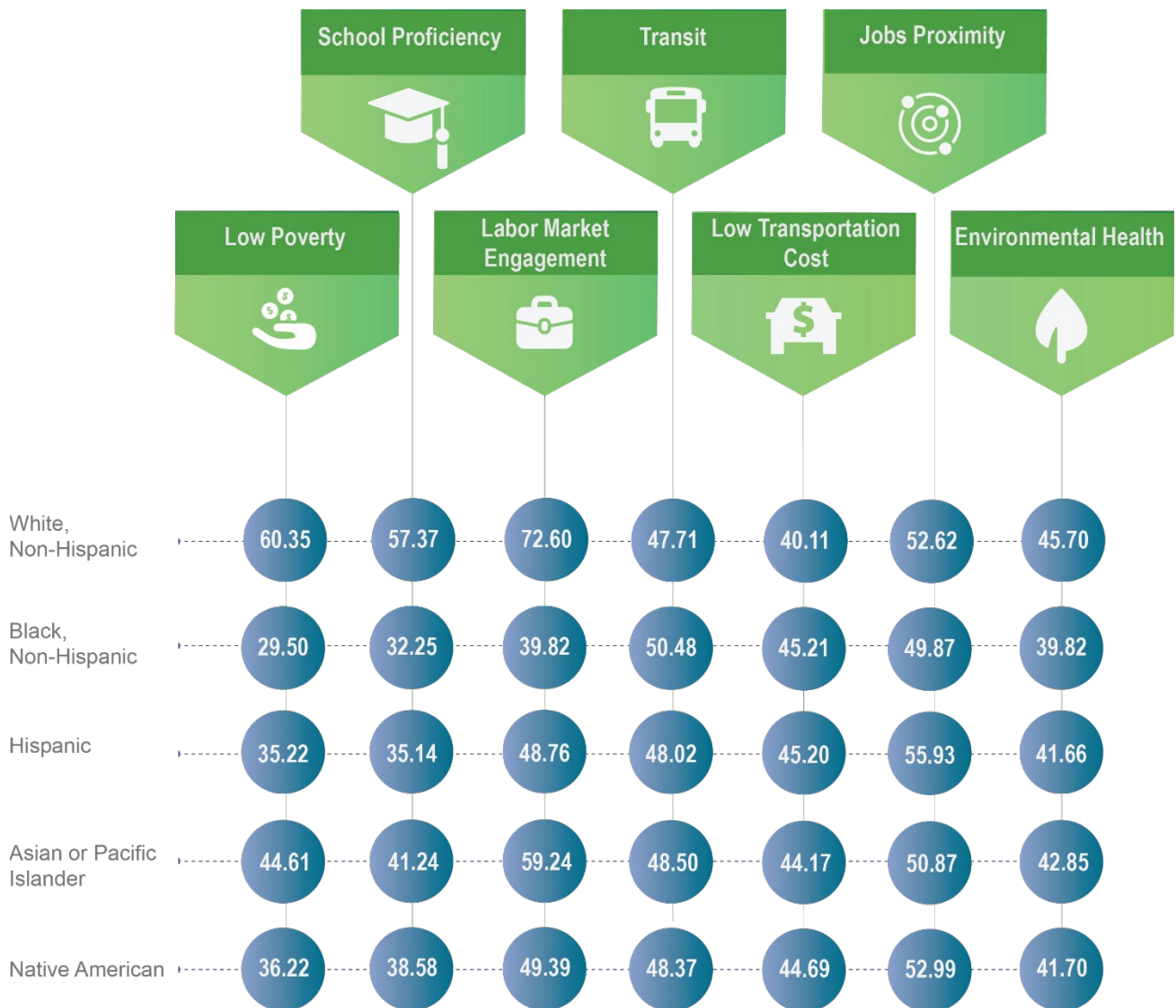


less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

According to these indicators, Black or African American residents are most likely to use transit, have the least access to jobs, and are more likely to be exposed to unhealthy environments. Index scores are worse for Black or African American populations below the federal poverty line, where scores are even lower for all indicators.

Meanwhile, Hispanic populations below the poverty line are most likely to live in areas with poverty and low performing schools. However, Hispanic populations below the poverty line are also more likely to live near jobs in the City of Greensboro.

**Figure 7: Opportunity Indicator Indices by Race/Ethnicity for population below poverty line, Greensboro 2016**



Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 12-Version AFFHT0004



**Table 10: Opportunity Indicators by Race/Ethnicity, Greensboro 2016**

Total Population	Low Poverty Index	School Proficiency Index	Labor Market Engagement Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
White, Non-Hispanic	60.35	57.37	72.60	47.71	40.11	52.62	45.70
Black, Non-Hispanic	29.50	32.25	39.82	50.48	45.21	49.87	39.82
Hispanic	35.22	35.14	48.76	48.02	45.20	55.93	41.66
Asian or Pacific Islander, Non-Hispanic	44.61	41.24	59.24	48.50	44.17	50.87	42.85
Native American, Non-Hispanic	36.22	38.58	49.39	48.37	44.69	52.99	41.70
<b>Population below federal poverty line</b>							
White, Non-Hispanic	47.70	51.96	63.24	50.99	46.59	52.24	42.81
Black, Non-Hispanic	21.89	33.38	32.45	53.36	48.20	48.66	37.44
Hispanic	21.34	27.41	34.33	46.55	45.79	56.69	40.36
Asian or Pacific Islander, Non-Hispanic	33.90	29.57	53.44	47.28	42.79	50.39	40.51
Native American, Non-Hispanic	34.67	37.29	39.37	48.50	44.11	49.91	39.64

*Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 12-Version AFFHT0004*

### Poverty

According to the U.S. Census Bureau, a person’s poverty status is determined by comparing the person’s total family income with the poverty threshold appropriate for that person’s family size and composition. In 2017, the federal poverty threshold for a family of four was \$25,283, for a single householder under the age of 65 was \$12,752, and for a single householder aged 65 or older was \$11,756.

Table 11 shows the poverty rate by age, race/ethnicity, disability and family status. Within Greensboro, two out of ten persons and more than one quarter of minors live in poverty (29.9 percent for children under 5 years and 27.2 percent for children under 18 years). Minority populations have higher rates of poverty, the highest of which are experienced by Native Hawaiian and Pacific Islander populations (43.5 percent) and Hispanic or Latino populations (30.7 percent). About one quarter of disabled persons also live in poverty. The rate of poverty is also higher for minors, where 32.6 percent of disabled minors live in poverty.

<b>Table 11: Poverty Status for Population for Whom Poverty Status Can Be Determined, 2017</b>			
	<b>Total</b>	<b>Below Poverty Level</b>	<b>Poverty Rate</b>
Greensboro	272,741	52,412	19.2%
<b>Poverty by Age</b>			
Children under 5 Years	17,423	5,204	29.9%
Children under 18 Years	61,576	16,719	27.2%
65 Years and Older	36,460	3,649	10.0%
<b>Poverty by Race/Ethnicity</b>			
White alone	132,048	15,706	11.9%
Black or African American alone	112,374	30,477	27.1%
American Indian and Alaska Native alone	1,185	341	28.8%
Asian alone	12,507	2,092	16.7%
Native Hawaiian and other Pacific Islander alone	255	111	43.5%
Some other race alone	7,634	1,943	25.5%
Two or more races	6,738	1,742	25.9%
Hispanic or Latino Origin (of any race)	20,246	6,215	30.7%
<b>Poverty by Disability Status</b>			
Total Population with a Disability	27,754	7,420	26.7%
Population Under 18 Years with a Disability	2,187	713	32.6%
Population 65 Years and Over with a Disability	11,717	1,858	15.9%
<b>In Family Households</b>	65,804	9,581	14.6%

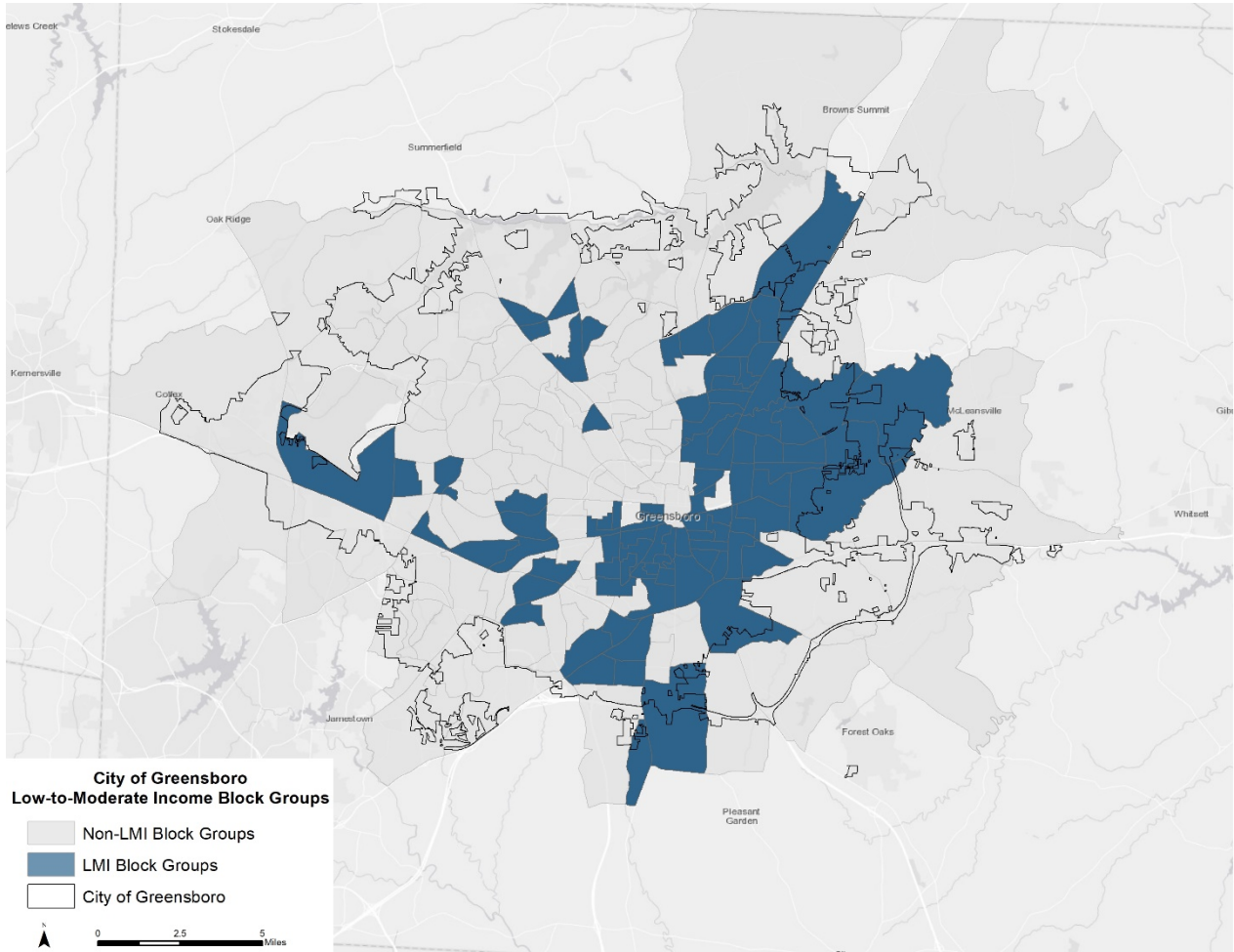
*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

Note:  
 Poverty by Age Universe: Population for whom poverty status is determined.  
 Poverty by Race/Ethnicity Universe: Population for whom poverty status is determined.  
 Poverty by Disability Status: Age by Disability Status by Poverty Status.  
 In Family Households: Family Income in the past 12 months below poverty level.

### Low-to-Moderate Income (LMI)

LMI residents are those whose family income is 80 percent or less of the HUD determined area median income. 45.2 percent of Greensboro residents are classified as LMI, a greater proportion than LMI residents in Guilford County as a whole (43.2 percent). Figure 8 shows the location of LMI census block groups in Greensboro; these are primarily residential areas where at least 51 percent of the residents are low-to-moderate income. Most LMI block groups are located in east Greensboro, coinciding with the locations of public housing and high needs communities. Some LMI residents are also located in west Greensboro, just north of Interstate 40.

**Figure 8: Low-to-Moderate Income Block Groups in Greensboro, 2015**



*Source: HUD-provided Low Moderate-Income Summary Data (2011-2015 ACS)*

### Education

Greensboro’s population is well-educated in comparison to the Greensboro-High Point Metro Area and North Carolina as a whole. For the population 25 years and over, 89.9 percent are high school graduates and 37.4 percent have a bachelor’s degree or higher. Statewide, 86.9 percent of persons 25 years and older graduated high school, 19 percent have a bachelor’s degree and 29.8 percent have a bachelor’s degree or higher.<sup>10</sup>

<sup>10</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

**Table 12: Educational Attainment Population over 25**

	Greensboro		Greensboro-High Point Metro Area		North Carolina	
	2017 Estimate	Percent	2017 Estimate	Percent	2017 Estimate	Percent
	Population 25 years and over:	187,014	(X)	507,926	(X)	6,784,048
Less than 9th grade	6,806	3.6%	24,723	4.9%	333,408	4.9%
9th to 12th grade, no diploma	12,175	6.5%	44,924	8.8%	556,286	8.2%
High school graduate (includes equivalency)	41,464	22.2%	139,321	27.4%	1,771,742	26.1%
Some college, no degree	42,398	22.7%	110,764	21.8%	1,468,899	21.7%
Associate's degree	14,207	7.6%	43,199	8.5%	627,997	9.3%
Bachelor's degree	43,977	23.5%	95,087	18.7%	1,303,604	19.2%
Graduate or professional degree	25,987	13.9%	49,908	9.8%	722,112	10.6%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

As seen in Table 13, persons with lower levels of education have higher poverty rates within Greensboro. The population of Greensboro over the age of 25 has a poverty rate of 14.4 percent in comparison to 34.1 percent of persons who have less than a high school diploma. The percentage of persons who live below the poverty level decrease as level of education increases; just 4.8 percent of persons with a bachelor’s degree or higher live below the poverty level.

**Table 13: Poverty rate for the population 25 years and over, for whom poverty status is determined by educational attainment level in Greensboro, 2017**

	Percent
Population 25 years and over	14.4%
Less than high school graduate	34.1%
High school graduate (includes equivalency)	20.1%
Some college or associate's degree	15.7%
Bachelor's degree or higher	4.8%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

### Employment

The labor force in Greensboro and the metro area increased from 2010 to 2017 as unemployment rates dropped from approximately 9 percent in 2010 to approximately 6.5 percent in 2017 as indicated in Table 14. However, the decline in the labor force participation rate denotes that less of the population over 16 is actively participating in the employment market.

<b>Table 14: Employment Status</b>				
	<b>Greensboro</b>		<b>Greensboro-High Point Metro Area</b>	
	<b>2010</b>	<b>2017</b>	<b>2010</b>	<b>2017</b>
Labor Force	209,870	229,917	560,329	602,802
Labor Force Participation Rate	67.3%	64.1%	66.2%	62.2%
Unemployment Rate	9.1%	6.5%	8.9%	6.6%
<i>Source: U.S. Census Bureau, 2006-2010 and 2013-2017 American Community Survey 5-Year Estimates</i>				
<i>Note: Labor force is population over 16 years</i>				

Within Greensboro, Education, Health care, and Social Assistance are the most prominent occupations, supporting approximately 38,000 jobs city-wide. Retail Trade and Manufacturing are the next largest industries, comprising 12.9 percent and 12.6 percent of occupations respectively.

<b>Table 15: Occupations by Industry in Greensboro, 2017</b>		
	<b>Estimate</b>	<b>Percent</b>
Total	143,068	(X)
Agriculture, forestry, fishing and hunting, and mining	93	0.1%
Construction	4,596	3.2%
Manufacturing	18,060	12.6%
Wholesale trade	3,506	2.5%
Retail trade	18,459	12.9%
Transportation and warehousing, and utilities	8,363	5.8%
Information	2,837	2.0%
Finance and insurance, and real estate and rental and leasing	9,499	6.6%
Professional, scientific, and management, and administrative and waste management services	13,209	9.2%
Educational services, and health care and social assistance	38,391	26.8%
Arts, entertainment, and recreation, and accommodations and food services	16,723	11.7%
Other services except public administration	6,312	4.4%
Public Administration	3,020	2.1%
<i>Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates</i>		



### Minimum Wage

There is a large gap between the minimum wage in North Carolina and the living wage calculation for the Greensboro-High Point Metro Area. North Carolina's minimum wage is \$7.25 an hour, far below the living wage of \$11.49 for one adult or \$27.50 for one adult and two children.<sup>11</sup> Although there is not a citywide minimum wage, the City of Greensboro did increase pay for new minimum wage workers employed by the city to \$15 an hour in the 2018-2019 fiscal year budget.<sup>12</sup> Considering these large gaps between minimum and living wages and the fact that 30 percent of households in Greensboro have a minor, households with adults earning minimum wage would need additional assistance to secure housing.

### Transportation

The City of Greensboro's Department of Transportation (GDOT) is in charge of ensuring the public safety and mobility in the city through the effective planning, construction and maintenance of transportation infrastructure and operation of municipal transit. Municipal services provided to residents, businesses and visitors include traffic signals and signs, transportation planning, parking, street lighting, sidewalks and bikeways. GDOT also oversees the Greensboro Transit Authority (GTA) public transit system and Specialized Community Area Transportation (SCAT) service for persons with disabilities.

Since 2010, the GDOT has proposed a series of improvements and recommended changes to the city's transit and multimodal infrastructure through its Comprehensive Transportation Plan. Moreover, the department has engaged the public to learn more about transportation and transit challenges in the city. Nonetheless, based on stakeholder feedback and data from the 2019 Community Needs Survey for the fair housing planning process, access to public transportation and multimodal infrastructure options, such as sidewalks and greenways, continue to be among the top needs and limitations of the city.

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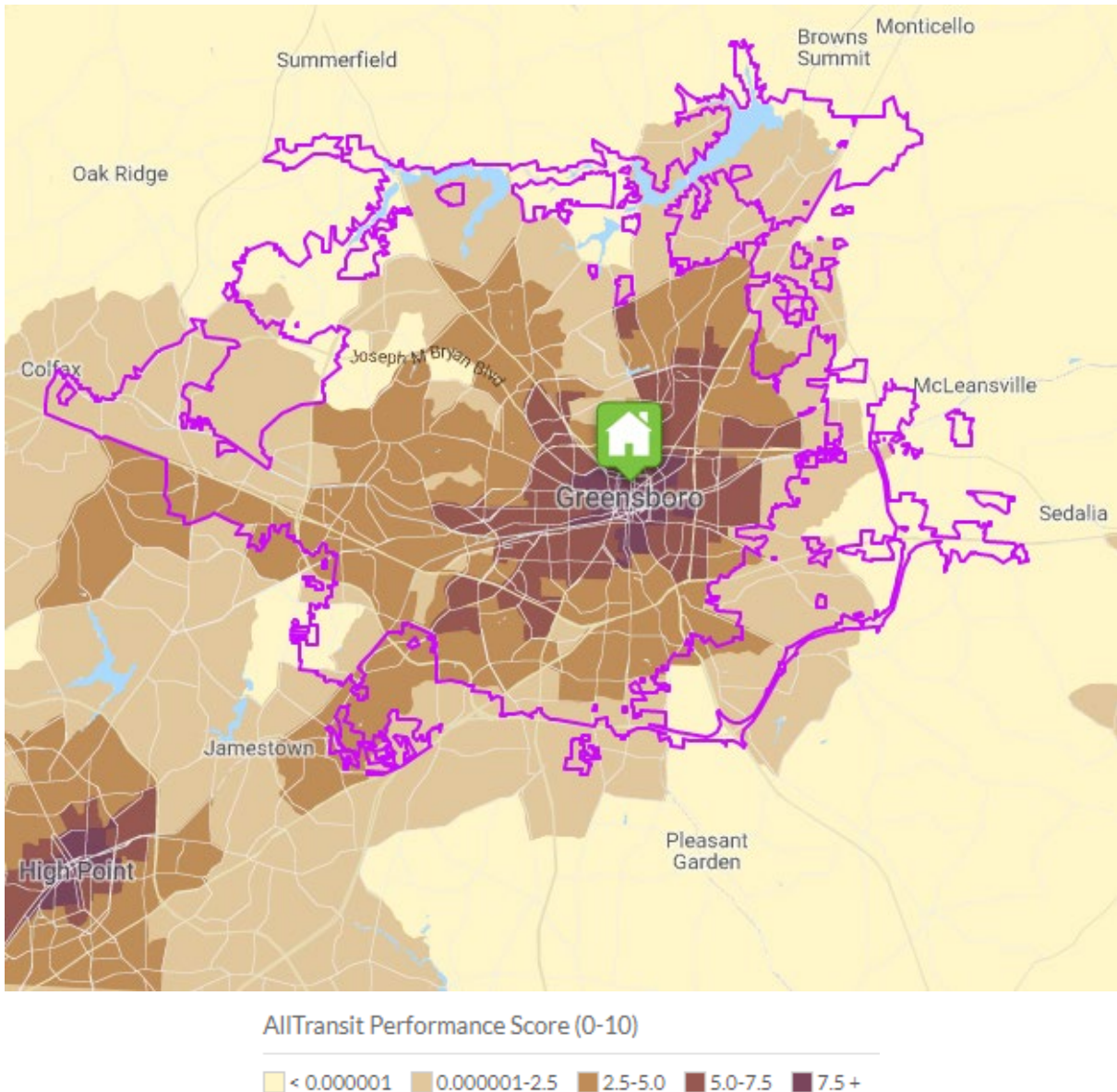
<sup>11</sup> Massachusetts Institute of Technology Living Wage Calculator <http://livingwage.mit.edu/metros/24660>

<sup>12</sup> <https://www.wfmynews2.com/article/news/local/greensboro-city-council-approves-5435m-budget-15-per-hour-minimum-wage/83-565783631>



Transit performance varies across Greensboro, decreasing as one moves from the core of the city to the edge of the city. According to the AllTransit Performance Score, which is an index that looks at connectivity, access to land area and jobs, and frequency of services, the average performance score across Greensboro is 3.7 out of 10. Areas in the core of the city score 7.5 and above, while areas along the western border that contain additional job centers rank below a 5 on the scale.

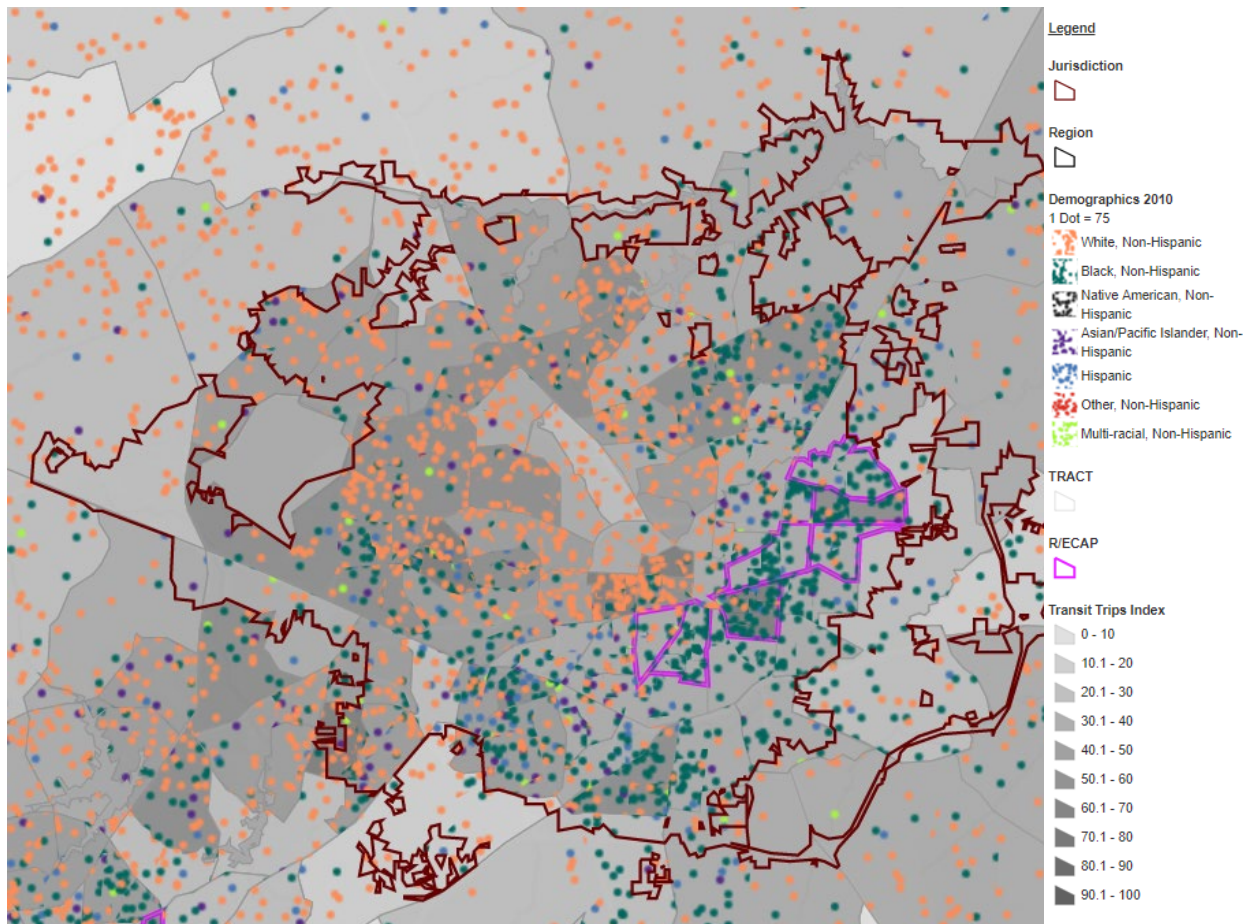
**Figure 9: Transportation Performance**



Source: AllTransit Performance Score, Center for Neighborhood Technology, 2003-2019

As the map below shows, overall transit usage is highest in areas closest to Downtown Greensboro, where transit access is more readily available. As Table 10 previously pointed out, through the Transit Trip Index, which indicates the different levels of transit usage by racial and ethnic groups in the city, transit usage is almost equally spread out among all residents of Greensboro, though Black residents have a higher usage of transit services than other groups in the city. Overall, however, access to transit is not significantly great across the city for most residents, which points out the need to create greater opportunities to enhance public transportation in the area.

**Figure 10: Transit Trips by Race/Ethnicity Greensboro**

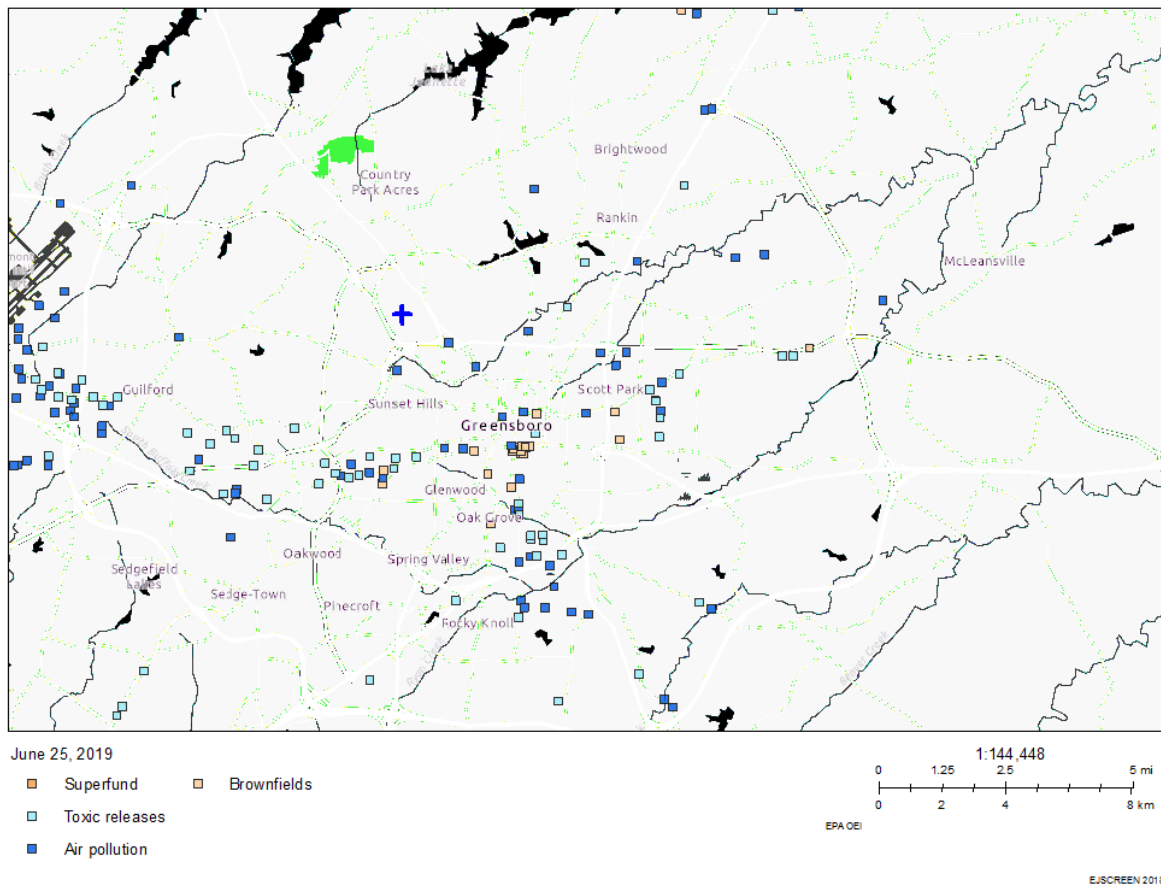


Source: Affirmatively Furthering Fair Housing Mapping Tool – Map 10 – Demographics and Transit Trips, Version AFFHT004

### Environmental Health

Air pollution and exposure to toxic sites can negatively impact residents of a community on a number of levels. Air pollution is regularly tied to asthma and exposure to toxic sites have been connected with increases in cancer and other serious disease. The following map displays sites that report to the U.S. Environmental Protection Agency (EPA) about levels of air pollution, Superfund sites, Brownfields, and toxic release data. Based on Figure 11 below, these sites are concentrated in areas near Downtown and along the industrial corridors along I-40 and I-85, but not concentrated in areas where there is public housing or low-income residents. See Figure 8 for a map of Low to Moderate Income Block Groups for reference.

**Figure 11: EPA Sites near Greensboro**



Source: Environmental Protection Agency's Environmental Justice Screening and Mapping Tool

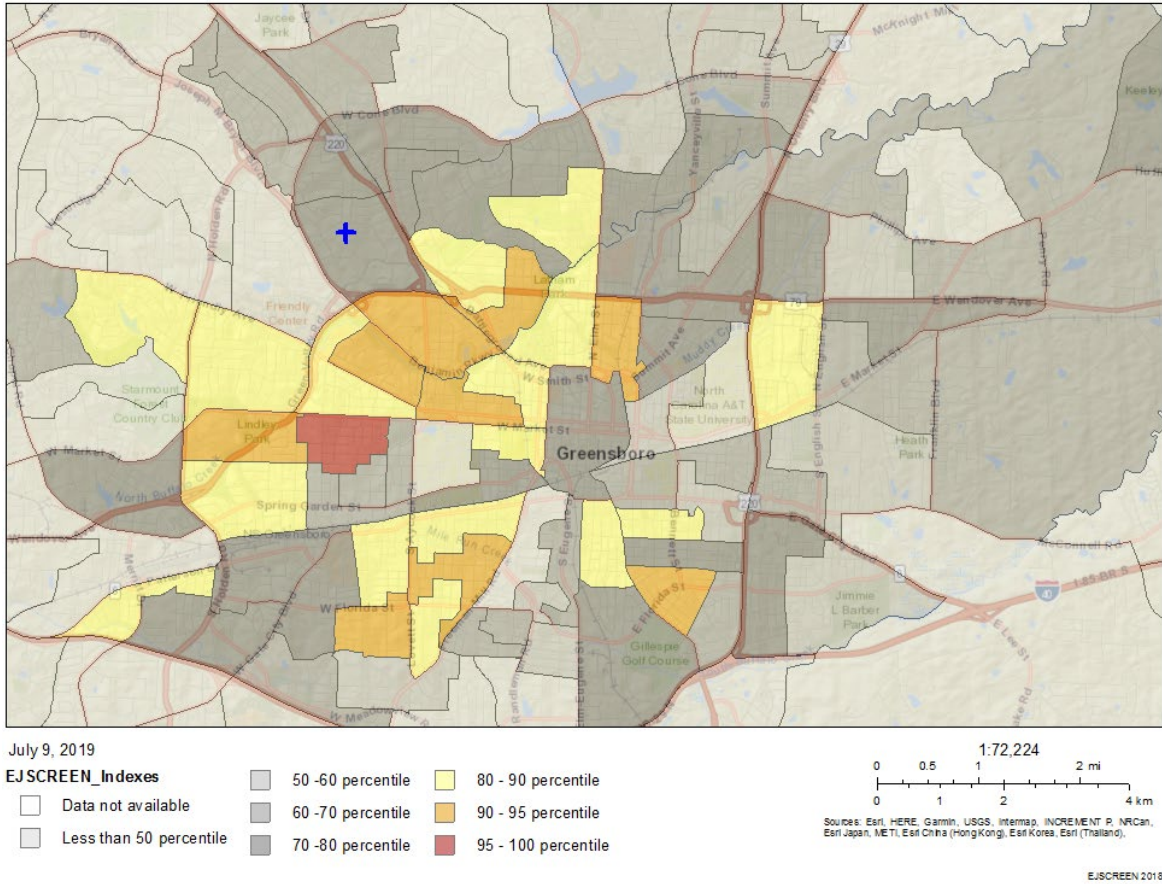
### Lead Based Paint

Lead paint is an environmental hazard that can cause negative health effects, including learning disabilities and behavioral problems in children. Houses built before 1960 have a good chance of containing lead-based paint. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning. Figure 12 below illustrates the percent of housing units built before 1960 by Census Block Group as an indicator of potential exposure to lead paint. Areas in north and west Greensboro have the highest instances of pre-1960 homes and therefore residents within these areas have the highest risk of lead



poisoning. Additionally, the locations of these high-risk lead-based paint properties are not located in areas where low-to-moderate income and racial minorities are concentrated. Greensboro’s Lead Safe Housing Program has made significant strides in the last few years to reduce exposure to lead paint hazards and provide access to healthier homes.

**Figure 12: Percent of pre-1960 Housing in Greensboro**



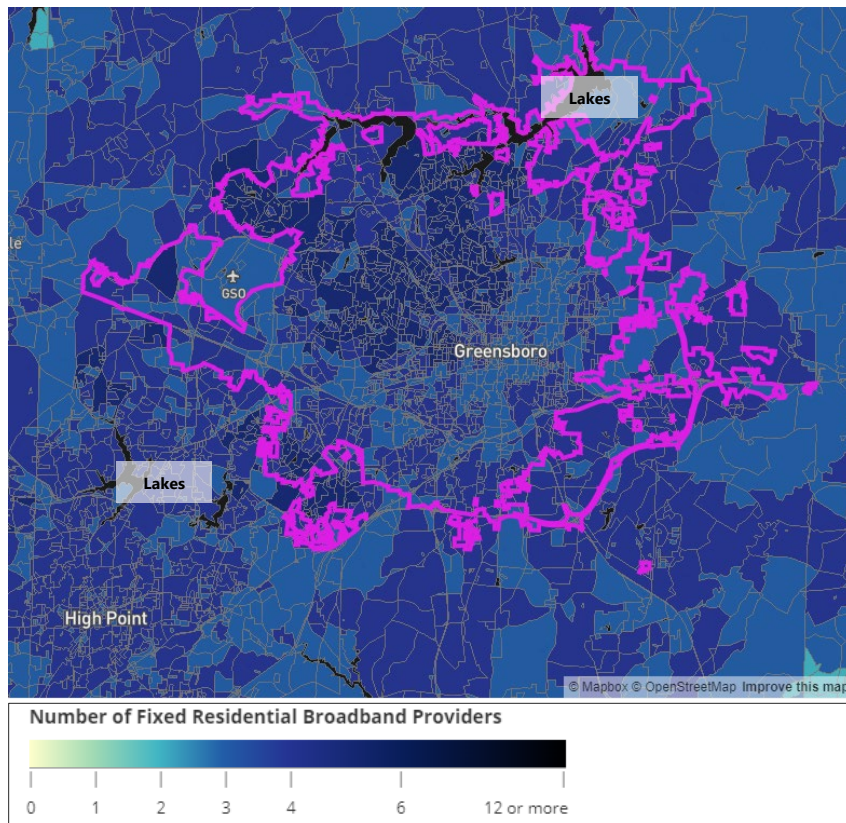
Source: Environmental Protection Agency’s Environmental Justice Screening and Mapping Tool

### Broadband Access

Access to residential broadband is considered by many a tool to minimizing the digital divide and increasing the quality of life, economic opportunity, and social interaction for communities. While access to residential broadband internet is available across the city, some discrepancies remain on the number of providers available in certain areas of the city. Such discrepancies may have an impact on the overall cost and quality of such services for residents in those areas. From the perspective of affordable housing choice, ensuring that quality residential broadband is available to all potential housing projects, particularly those located in the peripheries of the city and targeted redevelopment areas, such as East Greensboro, will ensure the long-term viability of such developments and improve the quality of life for potential residents.

With such goal in mind, in 2016, the City of Greensboro and the National Resource Network launched Access and Inclusion in the Digital Age. The guide was among the first broadband resource guides developed by and for local governments to address the digital divide in local communities. Among the main takeaways from such work was an ongoing commitment by the City of Greensboro to analyze gaps in existing infrastructure and service availability in broadband services. Such work continues today as the city seeks to provide greater access to high-speed internet to all its residents.

**Figure 13: Number of Fixed Residential Broadband Providers**



Source: FCC Fixed Broadband Map, 2017. Please note that bodies of water are colored black in the map above.

## Chapter 6. Housing Profile

The following chapter provides an overview of selected housing datapoints. The analysis examines local development patterns, housing market trends, supply of affordable housing, local housing conditions, and access to mortgage loans to provide insight into potential fair housing and community development challenges. Whenever possible, the chapter also seeks to expand on the connections between housing datapoints and driving factors in housing choice, such as economic development, employment, transit, and public facilities and services.

### Housing Vacancy Status

In 2017, Greensboro had a total of 129,162 housing units of which 114,552 were occupied (50.4 percent owner-occupied and 49.6 percent renter-occupied).<sup>13</sup> Approximately 14,600 or 12.8 percent of units were vacant. Data on the status of these vacant units indicates that about 43.4 percent were for rent, 7.7 percent were for sale, 7.3 percent were rented or sold but unoccupied, and 4.2 percent were for seasonal, recreational, or occasional use. However, 37.4 percent of the vacant housing stock and 4.8 percent of the total housing stock was counted as “other vacant” units; units that are not for sale or rent and tend to contribute to blight.

Table 16: Housing Vacancy Status in Greensboro, 2017		
	Estimate	Percent
Total Vacant Housing Units	14,610	NA
For rent	6,345	43.4%
Rented, not occupied	828	5.7%
For sale only	1,128	7.7%
Sold, not occupied	234	1.6%
For seasonal, recreational, or occasional use	618	4.2%
For migrant workers	0	0.0%
Other vacant	5,457	37.4%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey, 5-Year Estimates*

In the context of Greensboro, understanding how such moderately high vacancy rates impact housing choice remains a critical issue moving forward. For example, understanding the mechanism that leads to 37 percent of the vacant units to be labeled as “other,” may potentially reveal barriers that are keeping vacant units from being placed back in the market at an affordable price point for low income families or units that may be contributing to blight in neighborhoods and impacting perceptions of safety in the area.

### Housing Stock

An analysis of Greensboro’s housing stock provides an overview of local development patterns, and local trends. The majority of Greensboro’s housing stock was constructed between 1960 and 2000 indicating that residential development patterns follow a more suburban model which separates residential development from commercial and industrial uses. Residential development in Greensboro was above national averages between 1980 and 2000, indicating a strong construction market during that period. Production began to

<sup>13</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates



slow in 2000 and has declined dramatically since the housing crisis. Since 2010, only three percent of total housing units in Greensboro have been constructed. The age of the housing stock also indicates that most homes in Greensboro are not at risk for lead paint, which was primarily used before 1960. However, the aging housing stock is more likely to need repair and accommodations for people with disabilities.

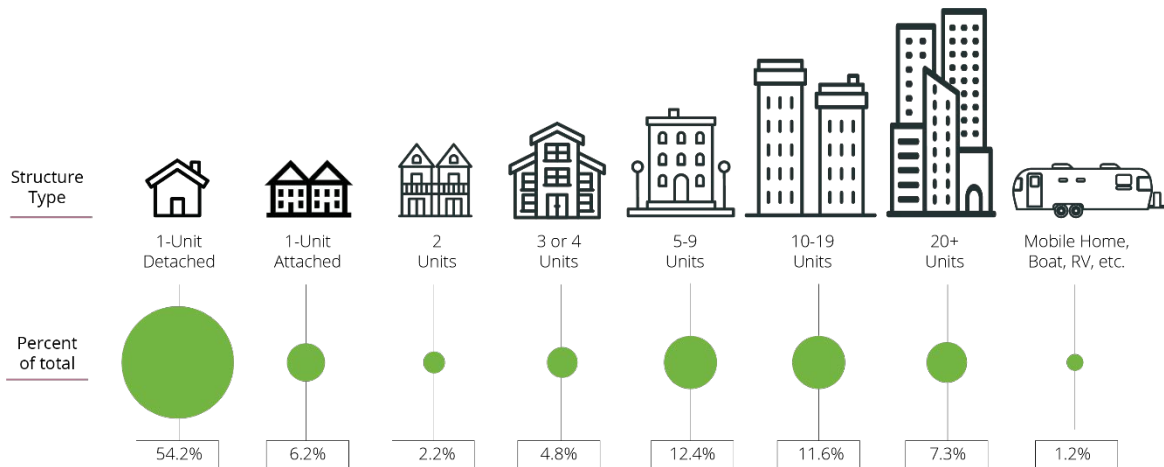
**Table 17: Year Housing Structure was Built, 2017**

	<b>Greensboro</b>	<b>Greensboro-High Point Metro Area</b>	<b>United States</b>
Total Housing Units	129,162	330,828	135,393,564
Built 2014 or later	0.6%	0.7%	0.9%
Built 2010 to 2013	2.4%	2.3%	2.3%
Built 2000 to 2009	14.5%	15.9%	14.5%
Built 1990 to 1999	18.3%	19.1%	14.0%
Built 1980 to 1989	18.3%	15.6%	13.6%
Built 1970 to 1979	15.8%	15.3%	15.5%
Built 1960 to 1969	11.2%	10.9%	10.8%
Built 1950 to 1959	9.8%	9.4%	10.5%
Built 1940 to 1949	3.6%	4.5%	5.1%
Built 1939 or earlier	5.5%	6.2%	12.9%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

The primary housing types in Greensboro are 1-unit attached and multifamily housing units with 5 or more units. More than half of all housing units in Greensboro (54.2 percent) are 1-unit detached housing units. There is also a significant proportion of multifamily units ranging from 5 to 19 units (24 percent), but a small percentage of small multifamily developments (2 to 4 units). Overall, the availability of multifamily housing supports the accommodation of a wide variety of households.

**Figure 14: Units in Structure, Greensboro, 2017**

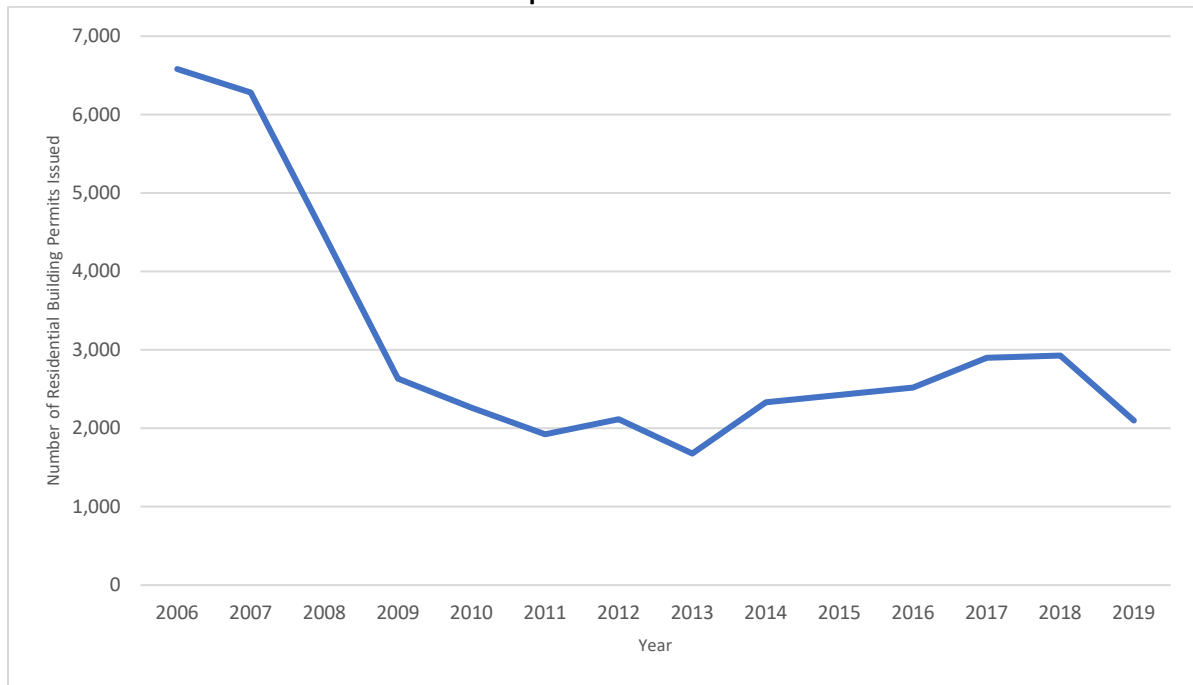


*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates*

### Building Permit Data

An analysis of building permit data provides an understanding of the number and types of housing units being built in the community. As the data in Table 17 denotes, there has been a decline in the production of new units in the last 20 years and more specifically since the housing crisis approximately 10 years ago. Building permits declined from 6,281 permits in 2007 to 4,465 permits in 2008 and 2,633 in 2009. These declines coincide with the national housing crisis, which peaked in 2009. Since reaching a low in 2013, issuance of building permits began to steadily rise, peaking at 2,927 in 2018 but permits have dipped to 2,099 as of April 2019.

**Figure 15: Total Number of Residential Building Permits Issued Greensboro High-Point Metro Area, April 2006-2019**

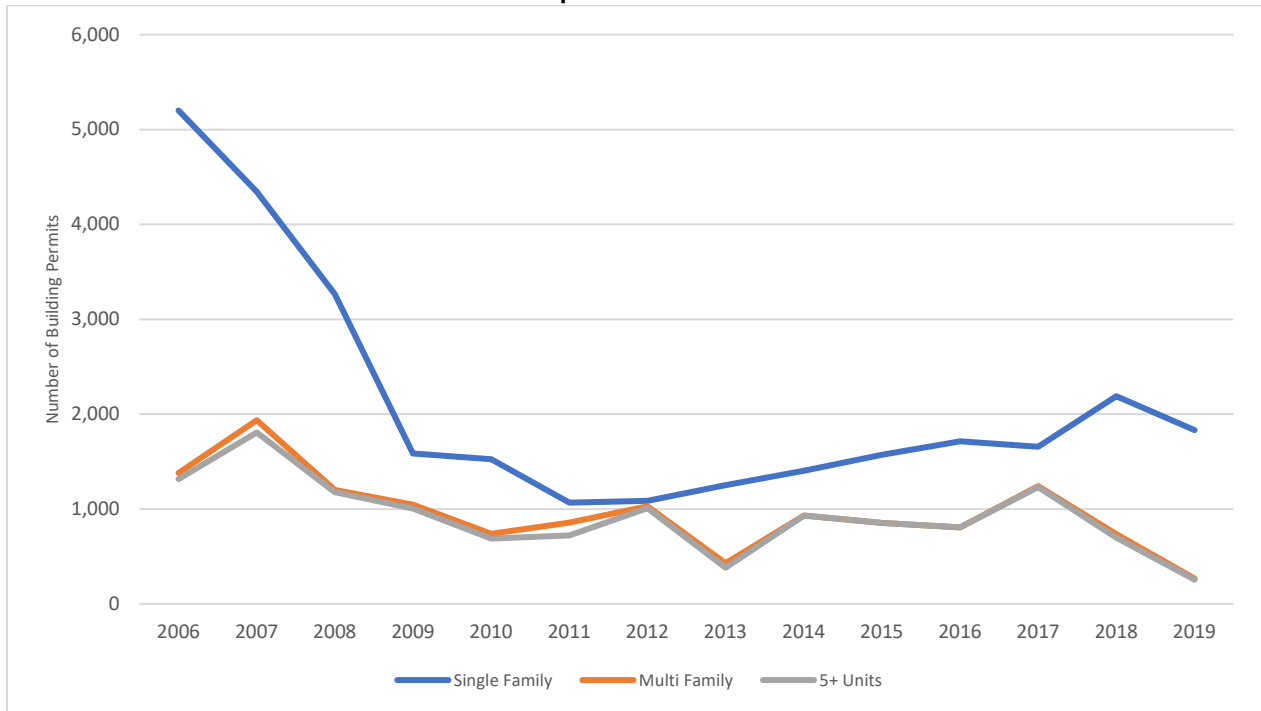


Source: State of the Cities Data System (SOCDS) Building Permits Database, 2006-2019

Note: Data is 12-month totals through April of each year.

Single family residential permits are consistently higher than multifamily and 5+ unit permits. Generally, the same amount of multifamily and more than 5-unit permits were issued between 2006 and 2019, denoting that the majority of multifamily development is 5+ units. After declining from 2007 to 2010, the number of multifamily permits fluctuated. In many instances, where issuance of single-family permits declined, multifamily permits increased.

**Figure 16: Residential Building Permit Type Greensboro High-Point Metro Area April 2006-2019**



Source: State of the Cities Data System (SOCDS) Building Permits Database, April 2006-2019  
 Note: Data is 12-month totals through April of each year.

### Affordability and Housing Need

ACS tabulated housing costs for owner-occupied units to include, among other things, mortgages, real estate taxes, insurance, and utilities, while housing costs for renter-occupied units include contract rent plus the estimated average monthly cost of utilities. Within Greensboro, the median housing cost for any type of housing was \$869. Costs were higher for owner-occupied households, which had a median cost of \$1,009 and lower for renter-occupied households, whose median costs were \$813. For most owner-occupied households (28.5 percent), housing costs ranged between \$1,000 and \$1,499, whereas for most renters (38.5 percent), housing costs ranged between \$500 and \$799. Table 22 shows housing costs for occupied housing units.

**Table 18: Monthly Housing Costs for Occupied Housing Units in Greensboro, 2017**

	Occupied Housing Units		Owner-Occupied Housing Units		Renter-occupied housing units	
	Estimate	Percentage	Estimate	Percentage	Estimate	Percentage
Less than \$300	5,444	4.8%	3,661	6.3%	1,783	3.1%
\$300 to \$499	9,866	8.6%	7,155	12.4%	2,711	4.8%
\$500 to \$799	32,041	28.0%	10,152	17.6%	21,889	38.5%
\$800 to \$999	23,618	20.6%	7,572	13.1%	16,046	28.2%
\$1,000 to \$1,499	27,078	23.6%	16,471	28.5%	10,607	18.7%
\$1,500 to \$1,999	8,080	7.1%	6,707	11.6%	1,373	2.4%
\$2,000 to \$2,499	3,120	2.7%	2,596	4.5%	524	0.9%
\$2,500 to \$2,999	1,501	1.3%	1,329	2.3%	172	0.3%
\$3,000 or more	2,255	2.0%	2,051	3.6%	204	0.4%
No cash rent	1,549	1.4%	(X)	(X)	1,549	2.7%
Median (dollars)	869	869	1,009	1,009	813	813

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

#### Monthly Housing Cost as a Percentage of Household Income

Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In Greensboro, 36.4 percent of households of varying incomes are cost burdened. For all occupied units, households within lower income brackets tend to be more severely cost burdened than those earning higher incomes. Table 20 shows that households earning less than \$35,000 annually were the most significantly cost burdened, where 28.4 percent of these households spend at least 30 percent of household income on housing costs. This trend is most prevalent in renter occupied housing units where overall, 48 percent of renter households are cost burdened. 50.7 percent of renter households earn less than \$35,000 and a whopping 84 percent spend 30 percent or more of household income on housing costs. On the other hand, out of renters earning \$50,000 or more, just one percent are cost burdened.

Lower income home owners also experience high rates of cost burden. Out of owner-occupied units, 12,575 have a household income under \$35,000, more than half of which, (65.4 percent) are cost burdened. Meanwhile, 63.7 percent owner-occupied households have a household income of at least \$50,000 and just four percent are cost burdened. This analysis supports that more affordable housing is needed throughout Greensboro, for especially lower income renters and homeowners.

**Table 19: Monthly Housing Cost as a Percentage of Household Income in Greensboro, 2017**

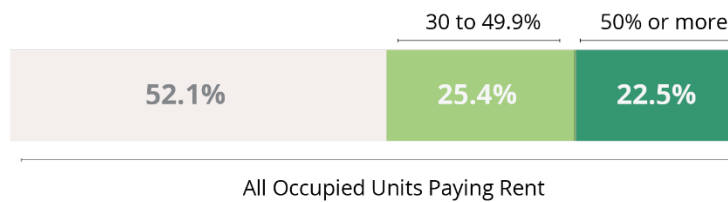
	Occupied Housing Units		Owner-occupied Housing Units		Renter-occupied Housing Units	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Less than \$20,000	21,146	18.5%	5,508	9.5%	15,638	27.5%
30 percent or more	19,017	16.6%	4,325	7.5%	14,692	25.8%
\$20,000 to \$34,999	20,234	17.7%	7,067	12.2%	13,167	23.2%
30 percent or more	13,528	11.8%	3,899	6.8%	9,629	16.9%
\$35,000 to \$49,999	17,934	15.7%	7,992	13.9%	9,942	17.5%
30 percent or more	4,996	4.4%	2,626	4.6%	2,370	4.2%
\$50,000 to \$74,999	19,925	17.4%	11,727	20.3%	8,198	14.4%
30 percent or more	2,082	1.8%	1,608	2.8%	474	0.8%
\$75,000 or more	31,814	27.8%	25,045	43.4%	6,769	11.9%
30 percent or more	803	0.7%	701	1.2%	102	0.2%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

### Gross Rent as a percentage of Household Income

Housing is generally considered affordable when it is less than 30 percent of a household’s income. Among renter households in Greensboro, 47.9 percent spend more than 30 percent of household income on rent. Of that, 25.4 percent pay more than 30 percent but less than 50 percent of household income on rent, while 22.5 percent pay more than 50 percent which is considered to be cost burdened. People who experience a cost burden are at risk of homelessness or other financial emergencies.

**Figure 17: Gross Rent as a Percentage of Household Income in Greensboro, 2017**



Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

**Table 20: Gross Rent as a Percentage of Household Income in Greensboro, 2017**

	Estimate	Percent
Occupied Units Paying Rent	56,858	(X)
30.0 to 44.9 percent	14,449	25.4%
50.0 percent or more	12,818	22.5%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

### Housing Size

The Analysis of Impediments examines household composition to understand patterns of family and non-family households. Family households are more likely to include a minor and to be subject to familial status

protections under the Fair Housing Act. Family Households are defined as those that consist of two or more individuals who are related by birth, marriage, or adoption, although they may include other unrelated people. Non-family households consist of people who live alone or who share their residence with unrelated individuals.

In 2017, 29.8 percent of Greensboro households had one or more people under 18 years. The average non-family household size was 1.3, whereas the average family size was 3.1.

<b>Table 21: Household Composition in Greensboro, 2017</b>	
Total Households	114,552
Average Household Size	2.4
Average Family Size	3.1
Average Non-Family Household Size	1.3
Percent of Households with one or more people under 18 years	29.8
<i>Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates</i>	

### Household Type and Size

The analysis of household type and size provides insight into the housing needs of the community. Of the 114,552 households in Greensboro, 65,804 are family households (57.4 percent), while 48,748 are classified non-family households (42.6 percent). Although the majority of all households are one and two persons, over 32 percent of all households contain three or more persons. Family households tend to be larger; 53.8 percent of family households contain three or more persons.

<b>Table 22: Household Type and Size in Greensboro, 2017</b>			
<b>Household Size</b>	<b>Family Households</b>	<b>Non-Family Households</b>	<b>Total Households</b>
Total Households	65,804	48,748	114,552
1-Person Household	(X)	39,274	39,274
2-Person Household	30,424	7,876	38,300
3-Person Household	16,350	1,100	17,450
4-Person Household	11,422	365	11,787
5-Person Household	5,367	128	5,495
6-Person Household	1,423	5	1,428
7-or-more person Household	818	0	818
<i>Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates</i>			

### Housing Problems

An examination of housing problems provides insight into the quality of local housing stock, and more specifically for the Analysis of Impediments the relationship between race and access to quality housing.

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



Of the households in Greensboro, 37.6 percent have at least one housing problem. Non-White households in Greensboro have the highest rates of experiencing any of the four housing problems, ranging from 45.2 percent (Black, non-Hispanic) to 49.9 percent (Other, non-Hispanic). This is in comparison with 30.1 percent of White, non-Hispanic households that experience any one of the four housing problems.

**Table 23: Demographics of Households experiencing any of 4 Housing Problems in Greensboro, 2017**

Race/Ethnicity	Number of Households	Number of Households with Problems	Percent Households with Problems
Total	111,610	41,970	37.6%
White, Non-Hispanic	57,045	17,190	30.1%
Black, Non-Hispanic	43,570	19,680	45.2%
Hispanic	5,720	2,745	48.0%
Asian or Pacific Islander, Non-Hispanic	3,217	1,415	44.0%
Native American, Non-Hispanic	395	120	30.4%
Other, Non-Hispanic	1,683	839	49.9%

Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 9-Version AFFHT0004, released 2017

Of the households experiencing housing problems, approximately half the number of households (19 percent) in Greensboro experience severe housing problems. Again, non-White households are more likely to experience one of the severe housing problems. Persons who classify as “Other” have the highest rates of housing problems, where 31 percent have a severe problem, followed by Hispanic and Asian or Pacific populations, who had 29 percent and 27 percent of households with problems respectively. Native American populations had the lowest rates of severe housing problems.

**Table 24: Demographics of Households experiencing any of 4 Severe Housing Problems Greensboro, 2017**

Race/Ethnicity	Number of Households	Number of Households with Severe Problems	Percent Households with Severe Problems
Total	111,610	21,195	19.0%
White, Non-Hispanic	57,045	8,139	14.3%
Black, Non-Hispanic	43,570	9,930	22.8%
Hispanic	5,720	1,685	29.5%
Asian or Pacific Islander, Non-Hispanic	3,217	870	27.0%
Native American, Non-Hispanic	395	45	11.4%
Other, Non-Hispanic	1,683	523	31.1%

Source: Affirmatively Furthering Fair Housing Mapping Tool – Table 9-Version AFFHT0004, released 2017

### Homeownership and Lending

A review of lending activities provides insight into potential patterns of discrimination and/or access to financing for protected classes. Under the Home Mortgage Disclosure Act, commercial lending institutions



are required to report all home loan activity. Data is provided at the county level and the tables below present the lending activity in Guilford County reported in the HMDA data from 2017.

Home loan originations in the county are primarily for home purchases, which signifies a healthy presence of homeownership in the area. Conventional loans dominate the local market and average. While barriers to accessing conventional loans may remain at the individual level, overall current trends point to a robust private lending market in the area.

**Table 25: Number and Amount Home Loans Originated by Purpose in Guilford County, 2017**

Home Improvement		Home Purchase		Refinancing	
Number	Amount \$000's	Number	Amount \$000's	Number	Amount \$000's
1,085	93,136	11,749	2,167,377	7,525	1,509,358

Source: Home Mortgage Disclosure Act 2017 Data

**Table 26: Number Loans Originated by Type in Guilford County, 2017**

Purpose	Conventional	FHA-Insured	FSA/RHS-Guaranteed	VA-Guaranteed
Home Improvement	981	63	N/A	41
Home Purchase	8,276	2,418	237	818
Refinancing	4,772	1,637	21	1,095

Source: Home Mortgage Disclosure Act 2017 Data

Overall, the approval rate for conventional loans is nearly 60 percent in Guilford County, which is on par with national figures. However, the denial rate in Guilford County is approximately 15 percent, 5 points higher than the national figures.<sup>14</sup>

**Table 27: Disposition of Loans in Guilford County, 2017**

Disposition of Loan	Conventional	FHA-Insured	FSA/RHS-Guaranteed	VA-Guaranteed
Application approved but not accepted	334	166	6	53
Application denied by financial institution	2,058	577	25	262
Application withdrawn by applicant	1,655	548	23	328
File closed for incompleteness	533	212	8	131
Loan originated	8,166	1,742	108	818
Loan purchased by the institution	1,283	873	88	362

Source: Home Mortgage Disclosure Act 2017 Data

<sup>14</sup> Data Point: 2017 Mortgage Market Activity Trends [https://files.consumerfinance.gov/f/documents/bcftp\\_hmda\\_2017-mortgage-market-activity-trends\\_report.pdf](https://files.consumerfinance.gov/f/documents/bcftp_hmda_2017-mortgage-market-activity-trends_report.pdf)





The table below provides the approval rates of home loans based on the income level of applicants. The percentage of AMI is based on an area median income of \$56,000. As national trends have shown, applicants with incomes below the Area’s Median Income are more likely to experience higher denial rates. For example, nationwide denial rates for conventional home-purchase loans were about 19.3 percent for Black borrowers, 13.5 percent for Hispanic-white borrowers, and 14.9 percent for other minority borrowers. In contrast, denial rates for similar loans for non-Hispanic White borrowers was 7.9 percent in 2017. Applicants with incomes above 120 percent of the AMI are also experiencing higher denial rates, which may point to other market forces, such as higher prices or secondary homes, that may contribute to such trends.

**Table 28: Distribution of Loans by Income Level in Guilford County, 2017**

Income Level	Application approved but not accepted		Application denied by financial institution		Application withdrawn by applicant		File closed for incompleteness		Loan originated		Loan purchased by the institution	
	#	% of Total	#	% of Total	#	% of Total	#	% of Total	#	% of Total	#	% of Total
< 50 % AMI	34	6.7%	507	18.3%	196	8.3%	88	11.6%	677	6.7%	40	3.8%
50-79 % AMI	95	18.7%	599	21.7%	447	18.9%	143	18.9%	1,817	18.0%	139	13.3%
80-99 % AMI	66	12.9%	422	15.3%	364	15.4%	119	15.7%	1,458	14.5%	137	13.1%
100-119 % AMI	51	10.0%	261	9.4%	256	10.8%	78	10.3%	991	9.8%	108	10.3%
120 % or More	263	51.7%	975	35.3%	1,104	46.6%	330	43.5%	5,141	50.9%	620	59.4%
Total	509		2,764		2,367		758		10,084		1,044	

Source: Home Mortgage Disclosure Act 2017 Data

As the table below shows, while White applicants have a higher number of home loan denials, proportional minority borrowers continue to experience higher rates of home loan denials in the context of Guilford County. While an array of factors may contribute to such trends, citywide efforts to educate borrowers on fair lending issues should continue to ensure that homeownership is accessible to all residents in Greensboro.





**Table 29: Race/Ethnicity of Applicant by Action Taken in Guilford County, 2017**

Race/Ethnicity	Application approved but not accepted	Application denied by financial institution	Application withdrawn by applicant	File closed for incompleteness	Loan originated	Loan purchased by the institution
American Indian or Alaska Native	3	24	16	6	41	1
Asian	22	100	113	44	455	42
Black or African American	139	839	572	209	2,071	105
Information not provided	12	56	43	27	137	7
Native Hawaiian or Other Pacific Islander	0	4	2	3	10	0
Not applicable	6	9	10	8	252	1,812
White, Not Hispanic	309	1,213	1,352	384	6,182	566
Hispanic	19	152	111	46	572	27

Source: Home Mortgage Disclosure Act 2017 Data

As Table 30 below shows, most loans originated in the area are for one-to-four family dwelling units with only a fraction going to multifamily units. For example, 10,684 loans were originated for one-to-four family dwelling units during 2017 in Guilford County, while only 54 loans were originated for multifamily dwelling units.

**Table 30: Action Status by Property Type in Guilford County, 2017**

Property Type	Application approved but not accepted	Application denied by financial institution	Application withdrawn by applicant	File closed for incompleteness	Loan originated	Loan purchased by the institution
Manufactured housing	9	216	14	89	96	15
Multifamily dwelling	1	4	6	2	54	
One-to-four family dwelling (other than manufactured housing)	549	2,702	2,534	793	10,684	2,591

Source: Home Mortgage Disclosure Act 2017 Data

While the previous tables presented a glimpse of the private lending activity at the county level, the table below provides a snapshot of mortgage lending activity at the city level. Overall, conventional and FHA-insured loans were the most popular mortgage products in the Greensboro market.



**Table 31: Action Status by Loan Type in Greensboro Census Tracts, 2017**

	<b>Conventional</b>	<b>FHA-insured</b>	<b>FSA/RHS-guaranteed</b>	<b>VA-guaranteed</b>
Application approved but not accepted	6	5	0	3
Application denied by financial institution	7	5	1	5
Application withdrawn by applicant	6	6	2	5
File closed for incompleteness	7	5	2	3
Loan originated	7	6	4	5
Loan purchased by the institution	6	5	1	5
<b>Total</b>	<b>39</b>	<b>32</b>	<b>10</b>	<b>26</b>

*Source: Home Mortgage Disclosure Act 2017 Data*

Greensboro, as one of the major urban areas of Guilford County, has similar mortgage lending trends. The following provides a deeper analysis of trends at the city level. Some of those trends include: a healthy number of loan approvals for conventional loans for single-family homes, higher denial trends for low-income and minority borrowers (particularly those earning below 80 percent of the Area’s Median Income), and a dwindling number of approvals for manufactured housing and multifamily housing.

As the table below showcases, the rate of denial for minority borrowers should be examined closer. Though the data provides only a snapshot of the market, the higher rate of denial for minority borrowers should be one that can be addressed by the City of Greensboro. Moreover, as highlighted by the Center for Responsible Lending, HMDA Data shows that generally, consumers of color and low-income families still lack access to conventional loans across the state and country.<sup>15</sup> While healthier economic and unemployment trends may mitigate some of those gaps in the short term, understanding how such forces impact fair housing choice in Greensboro remain crucial for the city in the long term.

<sup>15</sup> Center for Responsible Lending-Despite Growing Market, African-Americans and Latinos Remain Underserved. Retrieved from: <https://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl-2016hmda-policy-brief-sep2017.pdf>

**Table 32: Action Status by Applicant Race and Ethnicity in Greensboro Census Tracts, 2017**

	Application approved but not accepted	Application denied by financial institution	Application withdrawn by applicant	File closed for incompleteness	Loan originated	Loan purchased by the institution	Total
Hispanic or Latino	2	5	4	3	5	2	21
Information not provided	1	4	4	4	5	2	20
Not applicable	1	1	1	1	1	1	6
American Indian or Alaska Native	1	1	1	1	1	1	6
Asian	1	1	1	1	1	1	6
Black or African American	1	1	1	1	1	1	6
Native Hawaiian or Other Pacific Islander		1		1	1		3
White	1	1	1	1	1	1	6

*Source: Home Mortgage Disclosure Act 2017 Data*

### Other Local Housing Issues

Traditionally, the private sector has played a significant role in creating or expanding certain impediments to fair housing choice. Some real estate practices, such as steering or blockbusting, deed restrictions, inaccessible design, and occupancy quotes, are common indicators of the potential for discrimination and violations of the Fair Housing Act. The following is a closer look at some of those private-market housing issues.

### Real Estate Practices

Since 1920, the Greensboro Regional Realtors Association has served as the area’s local organization of real estate brokers. Membership in the association is bound by the code established by the National Association of Realtors, which obligates members to maintain high professional standards and adhere to fair housing law. In the case of a complaint, the association has policies established to handle such events.

### Advertising

Under Federal Law, no advertising 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.





A review of advertisements in the *Greensboro News & Record*, Craigslist, Trulia, Zillow, *Apartment Guide*, and Spanish-language *La Noticia Greensboro* and *Que Pasa Greensboro* found some inconsistencies in whether or not the Fair Housing language and logo were displayed, but no clear patterns could be established that systematically prohibited any particular group from occupying a dwelling unit.

### Foreclosures

In addition to advertising and real estate practices, communities of color and low to moderate income homeowners may also face obstacles securing conventional mortgage refinancing due to financial barriers or bias on the part of lenders. Additionally, these communities tend to be targeted for higher risk loans, which can lead to foreclosure at a higher rate. The following provides an analysis of local foreclosure trends and policies to inform the Analysis of Impediments and identify potential systematic barriers to access fair housing options in the area.

Based on data published by RealtyTrac; as of June 2019, the number of new pre-foreclosure filings are up by 116.7 percent from the previous year. Pre-foreclosure status begins when the lender files a default notice on the property, informing the owner that foreclosure may be initiated if debt is resolved. Meanwhile, auction filings are down by 21.1 percent and bank owned foreclosures are up slightly by 4.8 percent from the previous year. Overall, the 2019 total foreclosure rate of 0.06 percent in Greensboro is the same as in Guilford County, but slightly higher than the 0.05 percent rate of North Carolina and United States.<sup>16</sup>

In accordance with state law, property taxes become delinquent on January 6 for the current fiscal year, which runs from July 1 through June 30. Past due taxes are subject to enforcement measures including, but not limited to, garnishment of wages and bank accounts, levy on personal property, foreclosure of real estate, attachment of current and future state income tax refunds, and attachment of lottery winnings. Foreclosure of the tax lien is the last resort but is only seriously considered after all other remedies are exhausted even when only one year is in arrears. Once a foreclosure is deemed necessary and processed, the county advertises the sale of the property in local newspapers, schedules the sale and the property is sold at public auction to the highest bidder. Public sales of these properties are staggered throughout the year. The listing owner may redeem the property from the county by paying the delinquent taxes plus costs and attorney fees at any time up to and including the day of sale.

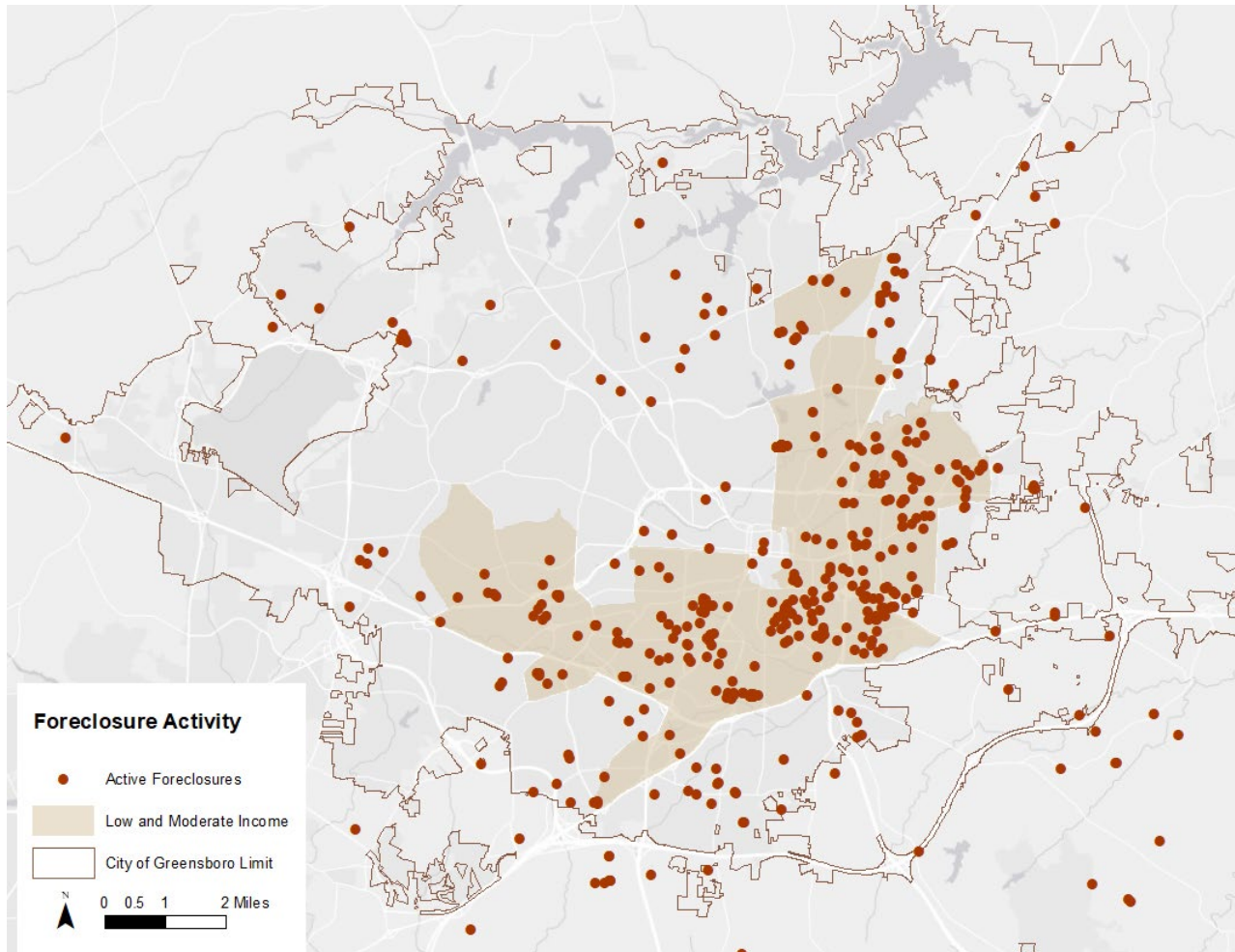
While the foreclosure process is particularly damaging for homeowners, tenants residing in homes undergoing foreclosure procedures are often placed in a precarious housing situation of not knowing if or when a foreclosure may occur and whether they will be able to secure an affordable alternative when the foreclosure does occur. In 2018, a permanent extension of the Protecting Tenants at Foreclosure Act (PFTA) was signed into federal law. The PFTA enables renters whose homes were in foreclosure to remain in their homes for at least 90 days or for the term of their lease, whichever is greater. Moreover, the Act provides most renters with at least a 90-day notice to move due to a foreclosure and additional protections for Section 8 housing choice voucher recipients. Educating landlords and tenants of such requirements remains critical in Greensboro and elsewhere in the country.

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<sup>16</sup> 2019 RealtyTrac Foreclosure Data <https://www.realtytrac.com/statsandtrends/foreclosures/nc/guilford-county/greensboro/>

According to 2019 records from Guilford County’s Tax Collection Division, as of June 2019 there were 468 active foreclosures in Greensboro. As shown in the map below, the vast majority of those active foreclosures are concentrated within low- and moderate-income areas of Greensboro. Based on feedback provided by stakeholders in the fair housing planning process, foreclosures continue to be a focal point for many residents as potential vacancies may lead to blight and new areas for criminal activity to thrive.

**Figure 18: Active Foreclosures in Greensboro, 2019**



*Source: Guilford County’s Tax Collection Division, as of June 2019*

### Low Income Housing Tax Credit (LIHTC)

The LIHTC Program provides tax incentives to encourage investment of private equity, including individual and corporate investors in the development, acquisition, and rehabilitation of affordable rental housing for low and very low-income households.

According to program guidelines, a unit is considered affordable if the household is paying no more than 30 percent of its income for housing costs (including utilities). As of 2018 the eligibility criteria for LIHTC-assisted units was federally amended to include households earning up to 80 percent of AMI. Households earning 80 percent AMI can be eligible, as long as the average income of all households in the assisted units

of the development is at or below 60 percent AMI. In exchange for tax credits, properties are required to comply with the investment regulations for 15 years and meet affordable rent criteria for at least 30 years.

In Greensboro, from 1987 to 2010, 163 low income apartment communities containing 2,017 rental apartments have been constructed and made affordable to low income persons by the LIHTC program.<sup>17</sup> Between 2010 and 2017, four projects were allocated LIHTC, which are listed in Table 33 below. All units within these projects were designated LIHTC units and provided housing for a variety of households, ranging from one to four-bedroom units. Claremont Courts specifically, provided a significant number of three- and four-bedroom units.

**Table 33: LIHTC Housing in Greensboro, 2010 - 2017**

Project Name	Project Address	Number of Units	Percent of LIHTC Units	Number of 3 Bedroom Units	Number of 4 Bedroom Units	Year of Credit Allocation
The Terrace at Rocky Knoll	435 Rocky Knoll Rd, Greensboro, North Carolina, 27406	48	100%	0	0	2012
Claremont Courts	2702 Patio Place, Greensboro, North Carolina, 27405	250	100%	60	106	2014
Caswyck Trail	4400 Rehobeth Church Rd, Greensboro, North Carolina, 27406	72	100%	18	0	2014
Sumner Ridge	4452 Old Randleman Rd, Greensboro, North Carolina, 27406	72	100%	24	0	2015

Source: [HUD LIHTC Database](#)

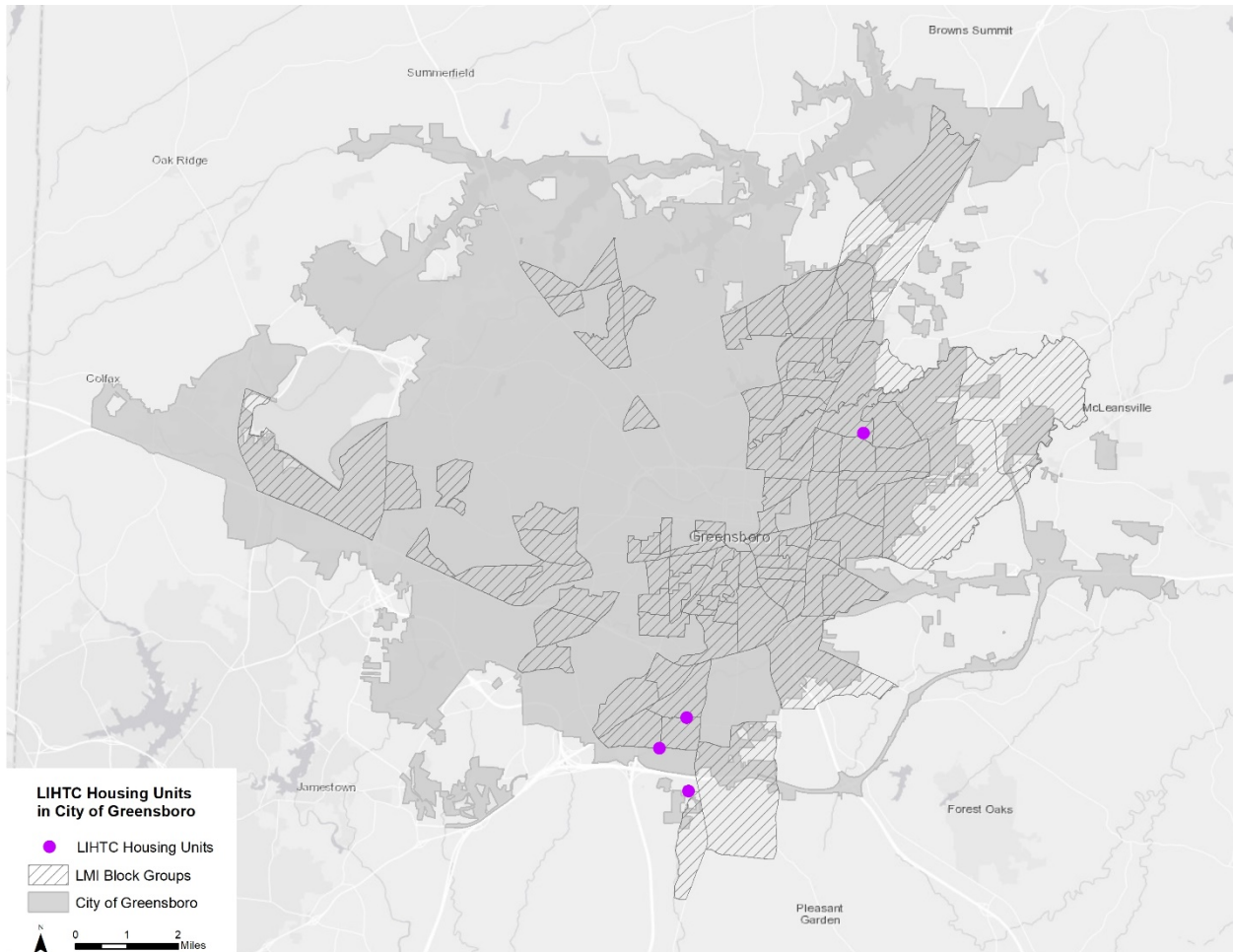
As seen in Figure 19, the location of the most recent LIHTC housing in Greensboro are all located within low-to moderate income census block groups. The City of Greensboro has designated several census block groups as opportunity zones, redevelopment areas, economic development focus areas, and other areas targeted for economic development. While none of these areas include the census tracts within which the most recent LIHTC housing is located, the housing projects are in close proximity to these areas and would therefore have a higher propensity to benefit from these investments.

Greensboro processes one to two nine percent LIHTC applications per year. Overall, the city is competing against Raleigh and Charlotte, which are places that have higher rents. Currently, bond funds allow the city to fill the gap in nine percent LIHTC projects, typically funding \$10-\$15K per unit. There is currently about \$3 million of bond funding allocated to existing projects.

<sup>17</sup> Affordable Housing in Greensboro, Guilford County North Carolina <https://affordablehousingonline.com/housing-search/North-Carolina/Greensboro>

Lastly, the Greensboro Housing Authority is gearing up to begin a LIHTC development. The GHA has had success doing RAD conversion in the last few years and currently have a 400-unit in the pipeline that may require city support.

**Figure 19: LIHTC Housing in Greensboro, 2017**



*Source: HUD Low Income Housing Tax Credit Database, 2017*

### Property Tax Policies

In June 2019, the Greensboro City Council approved a \$566.1 million budget for the 2019-20 fiscal year. The new budget included an increase in property taxes, which will go up three cents to 66.25 cents per \$100 property valuation. The increase represents the first increase in property taxes in 11 years. In addition to increased property taxes, residents will also see a \$2.50 per month increase for recycling.

While the increases are slated to further strengthen transportation, women and minority businesses, libraries, zoning, Parks and Recreation's Plan2Play Master Plan and the Greensboro Science Center, it remains to be seen what impact such increases may have on new or existing housing developments in the city, particularly in areas already experiencing underdevelopment.

## NIMBYism

Though difficult to quantify, based on feedback from stakeholders throughout the fair housing planning process, there is a prevalent perception in Greensboro that a sense of “Not In My Back Yard” continues to explicitly or implicitly drive the location of multifamily developments, social services, and overall access to adequate housing for minority residents. Though a more detailed risk assessment should be conducted by impacted organizations and stakeholders to determine the particular type or level of impediment created by such NIMBYism, it is critical that the City of Greensboro continues to expand efforts to diffuse such sentiment in the area through greater outreach and marketing efforts, engagement with community leaders from a variety of backgrounds, and the development of plans that blend community character into surroundings neighborhoods.

## Zoning

As part of the Analysis of Impediments to Fair Housing Choice in the City of Greensboro, an examination of current zoning was conducted to assess the impact its policies may have on fair housing choice in the short and long term. Local public policies developed through zoning regulations, subdivision ordinances, and updates to the comprehensive plan may have a significant impact on the site selection of affordable housing projects. Such policies may deter the development of affordable multifamily housing in areas of high opportunity, that have access to quality education, jobs, and transportation.

The following sections identify zoning policies promoted by the City of Greensboro and their potential impact on promoting fair housing choice:

### Zoning and Site Selection

Greensboro's first comprehensive plan was adopted by City Council in 2003. The now 15-year-old plan was designed to serve as a guide for Greensboro's residents and leaders by setting an overall vision for Greensboro in 2025. Based on this vision, in June 2010, the City Council adopted the city's current Land Development Ordinance (LDO) to govern development in the area. Together, the city's comprehensive plan and LDO provide the framework for land use and zoning regulations governing the spatial components and potential development of the city.

While the city is currently in the middle of updating its comprehensive plan through its PlanIT GSO initiative and developing a 10-year Affordable Housing Plan, certain zoning elements may continue to have an impact on fair housing choice in the jurisdiction:

### Location Buffers

The city's current Land Development Ordinance places a buffer of ½ to ¼ mile on the location of existing and new Social Service Facilities, which may include:

- Group care (more than alternative and post-incarceration) for more than nine residents; and care and treatment for psychiatric, alcohol, drug and other conditions, where patients are residents and more than nine patients are housed,
- Orphanages,
- Shelter for the homeless and transient lodging,
- Shelter, temporary or emergency, and
- Soup kitchen and food bank.



The distance of the buffer is consistent with established practices at the state level and nearby jurisdictions, including a 2,500 feet buffer in nearby Winston-Salem, to prevent the clustering of social service facilities. However, a more thorough analysis must be undertaken by city officials to understand whether such buffer remains consistent with the needs of the community and in particular for impacted populations. For example, Group Care Facilities are subject to a ½ mile separation from other Group Care Facilities. Meanwhile, family care homes and chartered homes have a similar ½ buffer between facilities. Given such variations and limitations, the current zoning ordinance may impose additional hurdles on group care and transient lodging based on site selection limitations. Proper protocols should be established to review special circumstances in a case-by-case basis and as requested, to grant reasonable accommodation to protected residents whenever such additional hurdles are identified.

### Manufactured Homes

The location of manufactured homes in the city is established through a Manufactured Housing Overlay District. Special districts tend to have a high risk of imposing an additional burden to homebuyers seeking a low-cost ownership option. Moreover, potential exterior appearance ordinances' requirements for manufactured homes, as outlined in §30-4-4.5 (B) of the Land Development Ordinance Code which establishes a mechanism to review and compare the design of proposed manufactured homes in the special district, may unnecessarily impose restrictions on housing choice for Manufactured Home owners by adding additional design hurdles or costs not imposed on other residential units in non-special districts in the jurisdiction.

While the city has made great efforts to accommodate modular homes in residential zones and allows a variety of housing types by maintaining a no minimum unit size for single-residential homes, proper procedures and policies should be established to review the location of new manufactured homes on a case-by-case basis to ensure that reasonable accommodation is provided to protected classes in such cases.

### Single Room Occupancy (SRO)

Under current zoning, Single Room Occupancy properties or SROs are defined as a building containing 25 or more rooming units, which are available for rental occupancy for periods of seven days or longer. New SRO properties are allowed in certain zoning districts (RM-5, RM-8, RM-12, RM-18, RM-26, RM-40, O, CB, and C-M) under certain additional use and development standards, while conversions of existing hotels or motels to SROs are allowed and exempted from lot area per dwelling unit restrictions. Moreover, SROs in the multifamily zoning districts must get a Special Use Permit in addition to development standards for the zoning district. Newly constructed facilities in the MU-Districts are exempt from the lot area per dwelling unit requirements of the base district.. Meanwhile, the residential capacity of a facility is determined by provisions of the NC Building Code in conjunction with the applicable setbacks, minimum landscaping, minimum off-street parking and other requirements of this ordinance.

While providing some flexibility to SRO conversions, the potential site location restriction of new SROs may create additional barriers in providing access to this type of housing accommodation for protected classes in the city. Additional attention should be paid to review such instances on a case-by-case basis.

### Minimum Floor Space Requirements

Certain ordinances requiring minimum floor space, such as requiring at least 70 square feet for an SRO unit, five square feet of common living space per rooming unit in SROs, or 400 minimum square feet for an



accessory dwelling unit, may increase the size and cost of housing if such an increase has the effect of excluding persons from a locality or neighborhood because of their membership in a protected class. Long-term efforts must continue to be made to ensure that such requirements meet community and resident needs in the broad sense and on a case-by-case basis.

### Reasonable Accommodation

The Fair Housing Act makes it unlawful to refuse to make “reasonable accommodations” to rules, policies, practices, or services, when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. A “reasonable accommodation” is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since rules, policies, practices, and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others may sometimes deny them an equal opportunity to use and enjoy a dwelling. In the case of the City of Greensboro, such accommodations are not clearly defined in the jurisdiction’s land use and zoning ordinances, thus leaving the potential for certain protected residents to experience limited access to fair housing options. In the long term, the city should examine the opportunity to include such safeguards in its zoning and development review mechanisms.

### Multi-Family

In recent years the City of Greensboro has made significant efforts to expand multi-family development by right in Commercial Districts and in the newly developed Light Industrial Mixed Use Districts. Projects such as Revolution Mill, in which multi-family and light industrial uses can coexist in the same zoned area, represent new opportunities to expand fair housing choice in the area and provide a broader set of possible site selection for future projects.

### Planning and Zoning Boards

The Greensboro Planning Board is composed of nine citizen members appointed by City Council for three-year terms. Some of the Planning Board’s responsibilities include:

- Reviewing the text of the Land Development Ordinance and advising the City Council on its changes.
- Advising the City Council on measures related to annexations and comprehensive planning.
- Making recommendations to the City Council regarding community development activities (such as plans and financing options to preserve neighborhoods, enhance downtown, create jobs, and expand the supply of safe affordable housing) and Neighborhood Small Projects program applications.
- Reviewing the Tree Conservation and Landscape Ordinances, advising staff on appropriate changes to the text, and providing professional expertise for developing program goals and policies for the Greensboro Urban Forestry Program.

In the last few years, the Planning Board has been active in ensuring proposed changes to the Land Development Ordinance, Future Land Use Plans, and Growth Strategy make sense for the character of the community and continue to ensure housing affordability and choice in the city.

In addition to the Planning Board, the city has a nine-member Zoning Commission, whose mission is to hear and decide on requests for amendments to the city’s official zoning map and in general considers housing topics in the framework of individual rezoning requests. In recent years, the Zoning Commission has been



tackling topics ranging from multifamily dwellings targeted to special populations, such as students, senior, and persons with disabilities, to the extension of other multi-family development opportunities in Greensboro.

In the long term, ensuring that the Planning Board and Zoning Commission develop a process to evaluate reasonable accommodations for protected classes in new developments should remain a priority for the city.

### Other

In addition to the zoning and land use elements already outlined, recent changes to more readily accommodate handicap ramps in units, allow multiple uses in the same lot (e.g. owner-occupied unit and short-term rental), address the need for Accessory Dwelling Units in certain areas, and reduced parking requirements for so-called tiny homes, which have expanded housing choice and options in the city. Citywide efforts should continue to find and expand on such opportunities.



## Chapter 7. Publicly Supported Housing

The Greensboro Housing Authority (GHA) is Greensboro’s largest provider of affordable housing; housing over 10,000 individuals through the Public Housing and Housing Choice Voucher Programs. Together with its community partners, the GHA staff implements and maintains programs that promote education, homeownership, youth achievement, wellness and self-sufficiency.

The mission of the Greensboro Housing Authority is to provide safe, quality, affordable housing to low-income families, elderly and the disabled in the Greensboro Community; to maintain a secure community environment; and to encourage personal responsibility and upward mobility of residents while maintaining the fiscal integrity of the agency.

Most of GHA’s inventory and other subsidized housing in Greensboro is geographically located in predominantly lower income and minority populated areas. These very affordable units tend to limit choice by their location.

Table 34 shows the race and ethnicity of households in publicly supported housing units based on the latest figures published by HUD. In Greensboro, residents of publicly supported housing are largely Black or African American. Black or African American populations comprise 95 percent of public housing, 91 percent of Housing Choice Voucher program housing, and over 60 percent of Project-Based Section 8 (PBRA) and other multifamily housing. In comparison to public housing and housing choice vouchers, White residents are significantly more likely to live in PBRA and other multifamily, which includes properties funded through the Supportive Housing for the Elderly and Persons with Disabilities programs, among other rental assistance programs.

Since 2013, the Greensboro Housing Authority has participated in HUD’s RAD program, which allows GHA to convert its public housing funding to Project-Based Section 8 funding. While such conversations may alter the distribution of the supportive housing provided by GHA, based on resident surveys conducted by GHA, demographic trends as presented in the table below have remained consistent across public supported households.

**Table 34: Publicly Supported Households by Race/Ethnicity, Greensboro Housing Authority**

Housing Type	White		Black or African American		Hispanic or Latino		Asian or Pacific Islander	
	Estimate	Percent	Estimate	Percent	Estimate	Percent	Estimate	Percent
Public Housing	3	2.8%	1,092	95.0%	20	1.7%	4	0.4%
Project-Based Section 8	248	29.1%	546	64.2%	26	3.1%	21	2.5%
Other Multifamily	47	34.6%	88	64.7%	1	0.7%	0	0.0%
Housing Choice Voucher Program	208	5.4%	3,532	91.0%	125	3.2%	13	0.3%

*Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 6, Version AFFHT0004, released 2017*

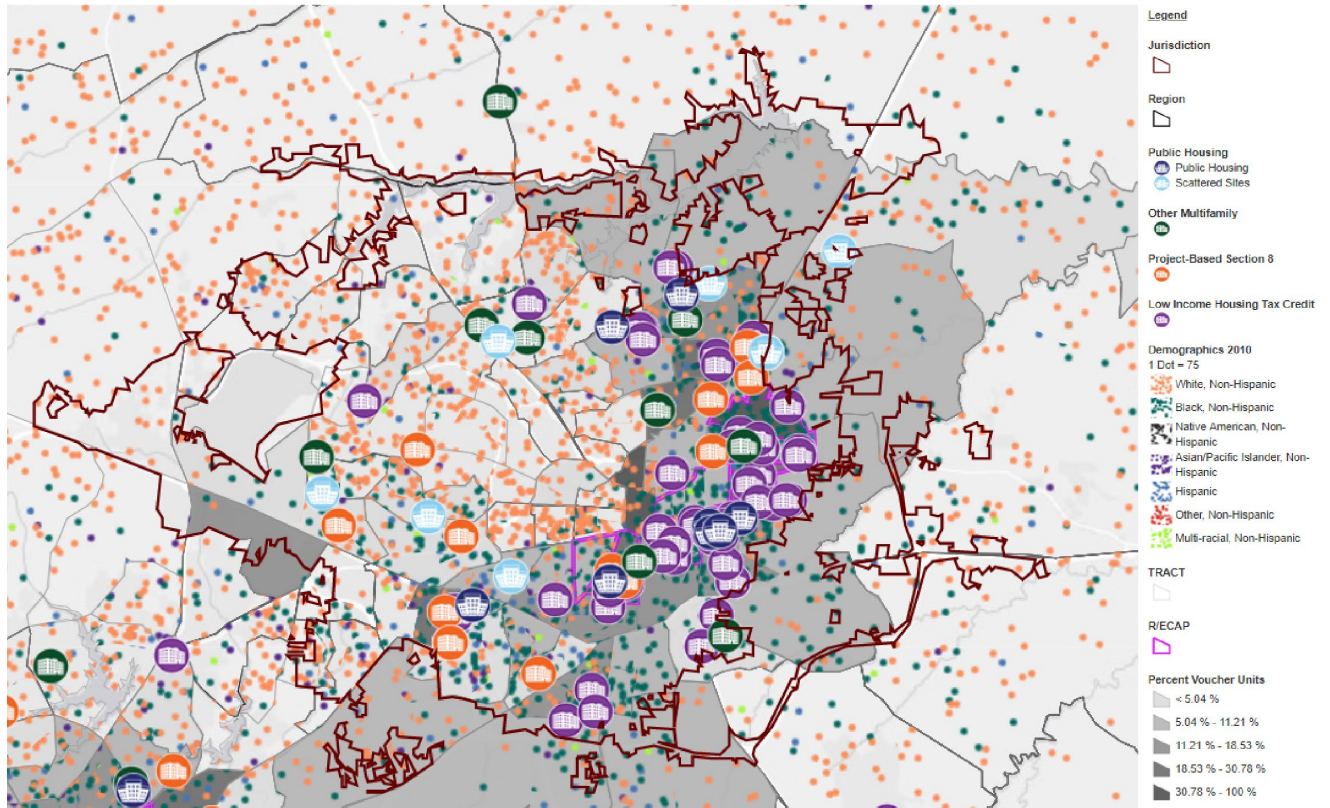
### Geography of Supported Housing

The Greensboro Housing Authority operates 430 units of conventional public housing and own and manage 2,213 units of project-based voucher housing in 20 communities throughout Greensboro, ranging from a small 6-unit



community to a large 430-unit community.<sup>18</sup> These public housing sites are listed in Table 35. As the map below shows those units are a portion of all supported housing in the jurisdiction, which includes Project-Based Section 8 Housing, Housing Choice Vouchers, LIHTC, and Other Multifamily support.

**Figure 20: Geography of Supported Housing, City of Greensboro**



Source: Affirmatively Furthering Fair Housing Mapping Tool – Map 5 – Publicly Supported Housing and Race and Ethnicity

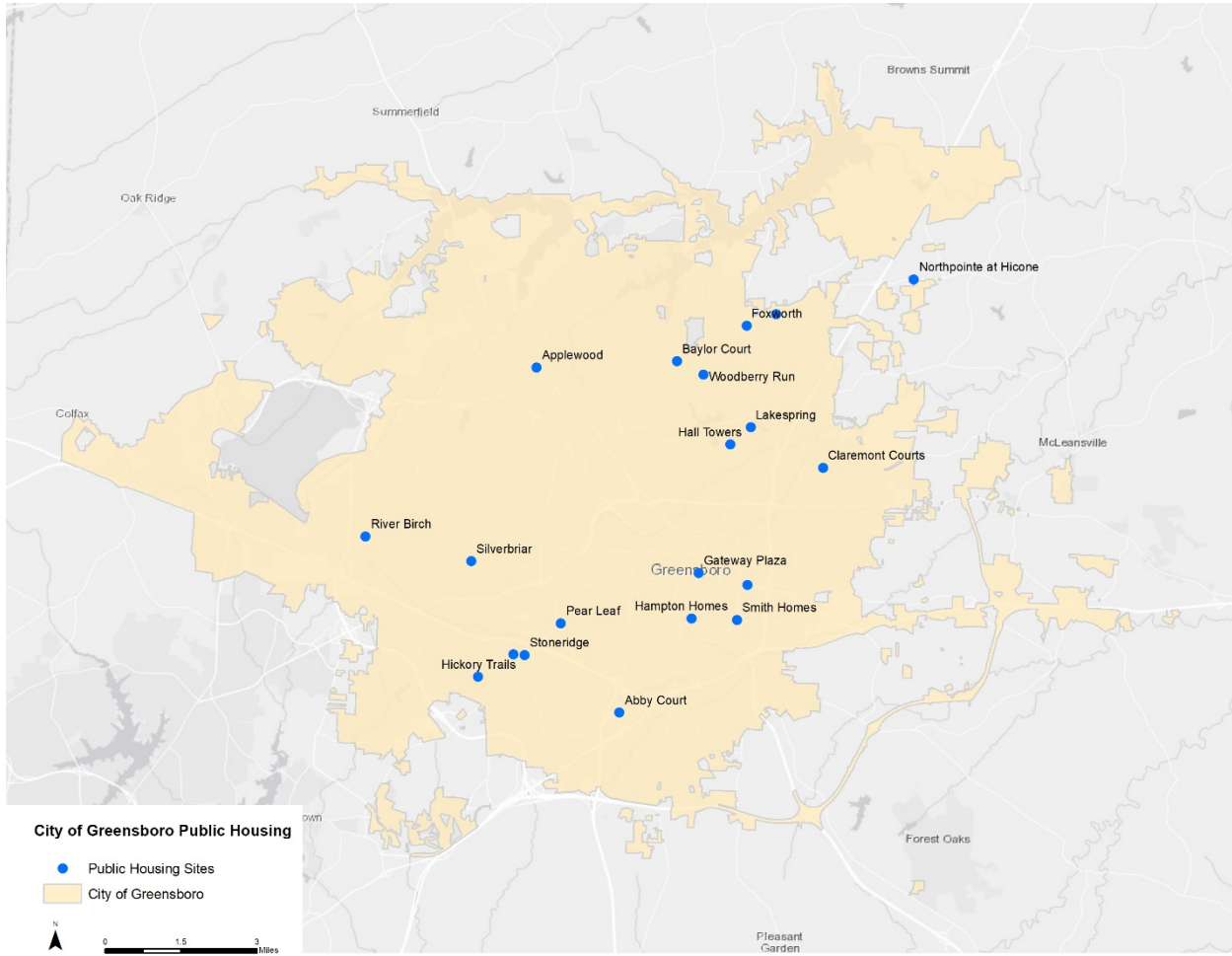
<sup>18</sup> Greensboro Housing Authority Community Data: Property Management and Asset Management, 2019



<b>Table 35: Greensboro Housing Authority Public Housing Sites</b>	
<b>Site Name</b>	<b>Address</b>
Abby Court	3403 Rehobeth Church Road
Applewood	3502 Old Battleground Avenue
Baylor Court	3911 Baylor Court
Claremont Courts	2702 Patio Place
Foxworth	1201 Thicket Lane
Gateway Plaza	200 Spring Garden Street
Hall Towers	2314 North Church Street
Hampton Homes	1300 Ogden Street
Hickory Trails	4223 Romaine Street
Lakespring	4 Lake Spring Court
Laurel Oaks	12 Laurel Lee Terrace
Northpointe at Hicone	5389-5399 Clarinda Drive
Pear Leaf	2917 West Florida Street
Ray Warren Homes	1306 East Lee Street
River Birch	312 North Swing Road
Silver Briar	4807 Silverbriar Court
Smith Homes	707 Florida Street
Stoneridge	1900 Peale Terrace
Woodberry Run	212 Berryman Street
Woodland Village	3819 Overland Heights
<i>Source: Greensboro Housing Authority</i>	



**Figure 21: Greensboro Housing Authority Sites**



*Source: Greensboro Housing Authority*

### Policy Review

Housing Choice Vouchers are designed to provide very-low income households with the flexibility to choose the location of their affordable housing unit. Instead of providing units within a conventional public housing development, households may rent a unit from a private sector landlord or use the voucher to participate in a lease to own program. Households typically pay between 30 percent and 40 percent of their adjusted annual income towards housing costs. The Greensboro Housing Authority receives funding from HUD to provide housing vouchers to a fixed number of eligible very-low income households. Interested individuals are required to apply to the GHA waiting list and households are selected when a housing voucher becomes available. Vouchers offer more choice than traditional public housing subsidies as voucher holders are not limited to specific neighborhoods or housing types and can be used for rental assistance in tenant-based programs, project-based programs, and homeownership assistance.





According to the GHA website, households are selected in the following way:

- Households must apply to the waiting list
- GHA selects from the waiting list and determines eligibility
- GHA issues a housing choice voucher and the family searches for housing
- Housing Quality Standards (HQS) inspection is conducted
- GHA determines whether the rent to owner is reasonable
- Landlord lease and Housing Assistance Payments (HAP) contract executed

### Housing Authority Role

Households are also given a listing of available assisted housing in the jurisdiction or may access the information at [socialserve.com](https://socialserve.com). When the family finds a unit that the owner is willing to lease under the program, the family will submit the HUD-required tenancy addendum, the completed Request for Tenancy Approval (RFTA) form, and an unsigned landlord lease. GHA will process the form to determine if the unit selected is affordable and contact the property owner to schedule a Home Quality Standards inspection.

Meanwhile, the selection process and waiting lists are announced via public notice in local newspapers and also in available minority media channels. All applicant files on the waiting list are retained for three years, while annual updates are made to ensure the pool of applicants represents interested families. Finally, the waiting list is maintained in alphabetical order, preference, date and time of application. Per HUD regulations, the waiting list is not maintained by bedroom size.

Admission preferences from the waiting list are consistent with all applicable Federal nondiscrimination and civil rights statutes and requirements. The Greensboro Housing Authority selects families based on local housing needs and priorities. Applicants who reside or work in GHA's jurisdiction receive priority in placement and selection from the waiting list.

## Chapter 8. Housing for Persons with Disabilities and Other Circumstances

The Fair Housing Act prohibits housing discrimination against any person based on disability. Disability is one of the protected classes under the Fair Housing Act. According to 2017 American Community Survey (ACS) data, 10 percent or 28,127 of Greensboro’s non-institutionalized population are persons with a disability. Of persons with a disability for whom poverty status was determined, 2.7 percent live below the poverty level and 7.5 percent live at or above the poverty level within Greensboro. Within the senior population (over the age of 65) of people with disabilities, about 16 percent live below the poverty level.<sup>19</sup>

Table 36 below shows the distribution of disability types throughout Greensboro and the Greensboro High Point Metro Area. The most common disability types include ambulatory, cognitive, and independent living difficulties; 5.7 percent of persons in Greensboro and 7.1 percent of the Greensboro-High Point Metro Area have an ambulatory difficulty. These figures demonstrate a need for housing units that accommodate ambulatory and independent living difficulties.

<b>Table 36: Disability Type</b>				
<b>Disability Type</b>	<b>Greensboro</b>		<b>Greensboro-High Point Metro Area</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Hearing difficulty	6,532	2.6%	21,948	3.2%
Vision difficulty	4,690	1.9%	14,853	2.2%
Cognitive difficulty	10,189	4.0%	33,603	4.9%
Ambulatory difficulty	14,402	5.7%	48,060	7.1%
Self-care difficulty	5,753	2.3%	18,317	2.7%
Independent living difficulty	10,021	4.0%	32,595	4.8%

*Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 13, Version AFFHT004, released 2017*  
 Note: All % represent a share of the total population within the geography.

The likelihood of an ambulatory and hearing disability is higher in seniors than non-seniors, whereas cognitive disability is most prevalent in non-seniors. The data indicates there is a need for hearing difficulty accommodations for seniors. The prevalence of persons with cognitive disabilities between 18 and 65 suggest there is a need for supportive housing in Greensboro. Overall, persons with disabilities can face challenges finding housing that is affordable, accessible and near supportive services. This may be especially difficult for those that need specialized care and housing accommodations.

In addition to these challenges, based on stakeholder and community feedback, issues related to service animals for persons with disabilities appear to be a rising issue in the context of fair housing and general access to adequate housing. Current guidelines and guidance related to service animals should be reviewed and evaluated across city programs to ensure that reasonable accommodation is considered in a case-by-case basis and that policies are clear and adherent to Fair Housing rules and legislation.

<sup>19</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

**Table 37: Disability Type by Age Group in Greensboro, 2017**

Disability Type	Total Population with Disability	65 Years and Over		Under 65 Years	
		Estimate	Percent	Estimate	Percent
Ambulatory	14,917	7,913	53.0%	7,004	47.0%
Cognitive	10,321	2,723	26.4%	7,598	73.6%
Hearing Difficulty	6,633	4,031	60.8%	2,602	39.2%
Independent Living	10,817	5,366	49.6%	5,451	50.4%
Self-Care	6,185	2,980	48.2%	3,205	51.8%
Vision Difficulty	4,280	1,730	40.4%	2,550	59.6%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5 Year Estimates*

Note:

- Total Population with a Disability includes institutionalized and non-institutionalized populations.
- Independent Living only includes those 18 to 64 years.

### Accessible Housing Supply and Affordability

The Housing Choice Voucher program has the highest percentage of persons with a disability across publicly supported housing in Greensboro and the region. Within Greensboro and the metro area, more than one quarter of participants in the HCV program are persons with a disability, while other multifamily housing has the smallest percentage of persons with a disability (10.7 percent).

**Table 38: Disability by Publicly Supported Housing Program Category**

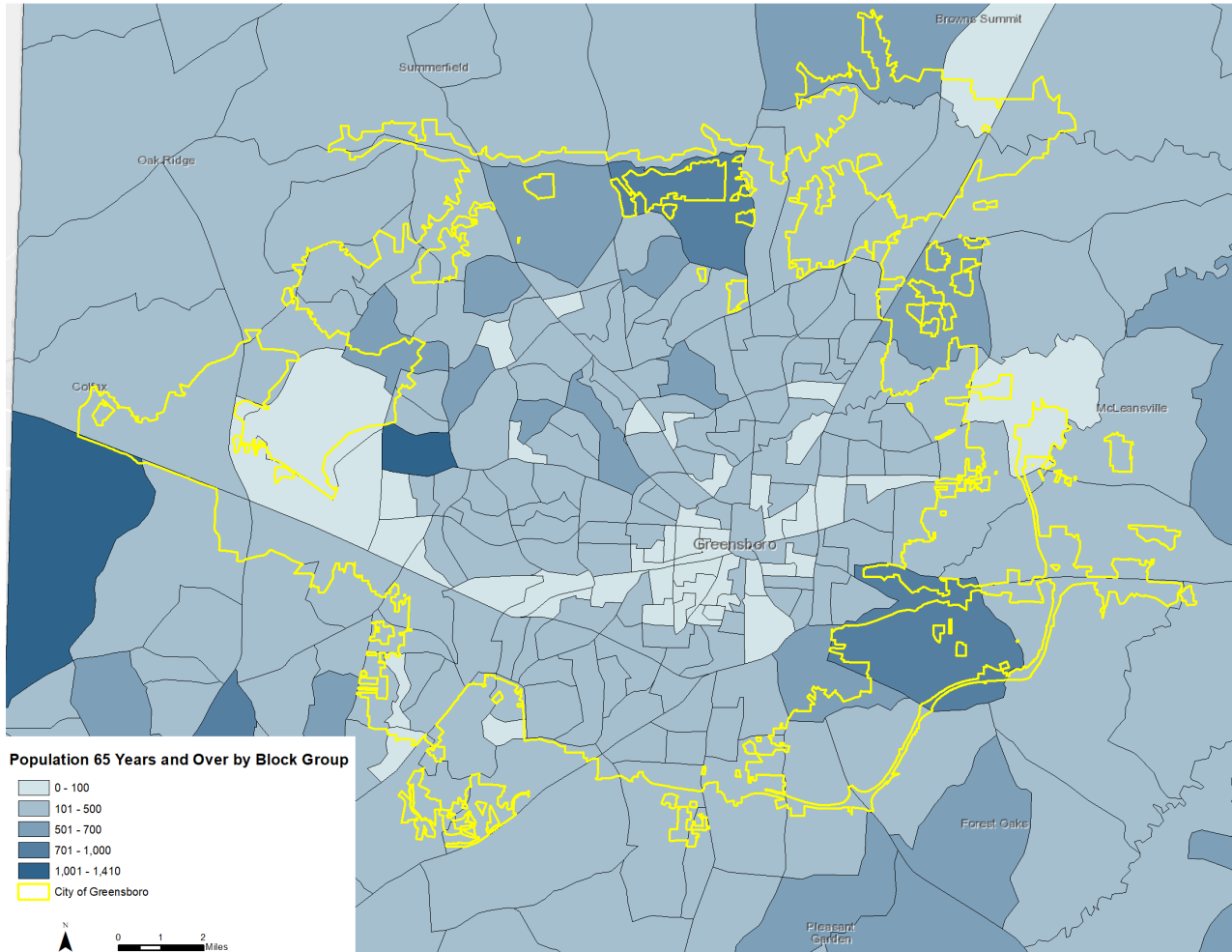
Greensboro, NC CDBG, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	143	12.2%
Project-Based Section 8	122	13.8%
Other Multifamily	18	10.7%
HCV Program	1,144	28.8%
Greensboro-High Point, NC Region	#	%
Public Housing	392	17.1%
Project-Based Section 8	296	18.9%
Other Multifamily	33	11.7%
HCV Program	1,700	25.8%

*Source: Affirmatively Furthering Fair Housing Mapping Tool - Table 15, Version AFFHT004, released 2017*

### Access to Opportunity

As previously mentioned, persons over 65 years also comprise a large portion of the persons with an ambulatory disability in Greensboro. As such, a closer look at this subset of the population helps determine how access opportunity is impacted for persons with disabilities in the city. With such goal in mind, Figure 22 below illustrates the distribution of persons 65 years and over in Greensboro. Overall, senior residents are mostly concentrated in the less dense, residential, outer boundaries of Greensboro’s city limits. The location of the senior population in primarily residential areas could pose challenges with connecting this population to transit and health care services, among other needs and services.

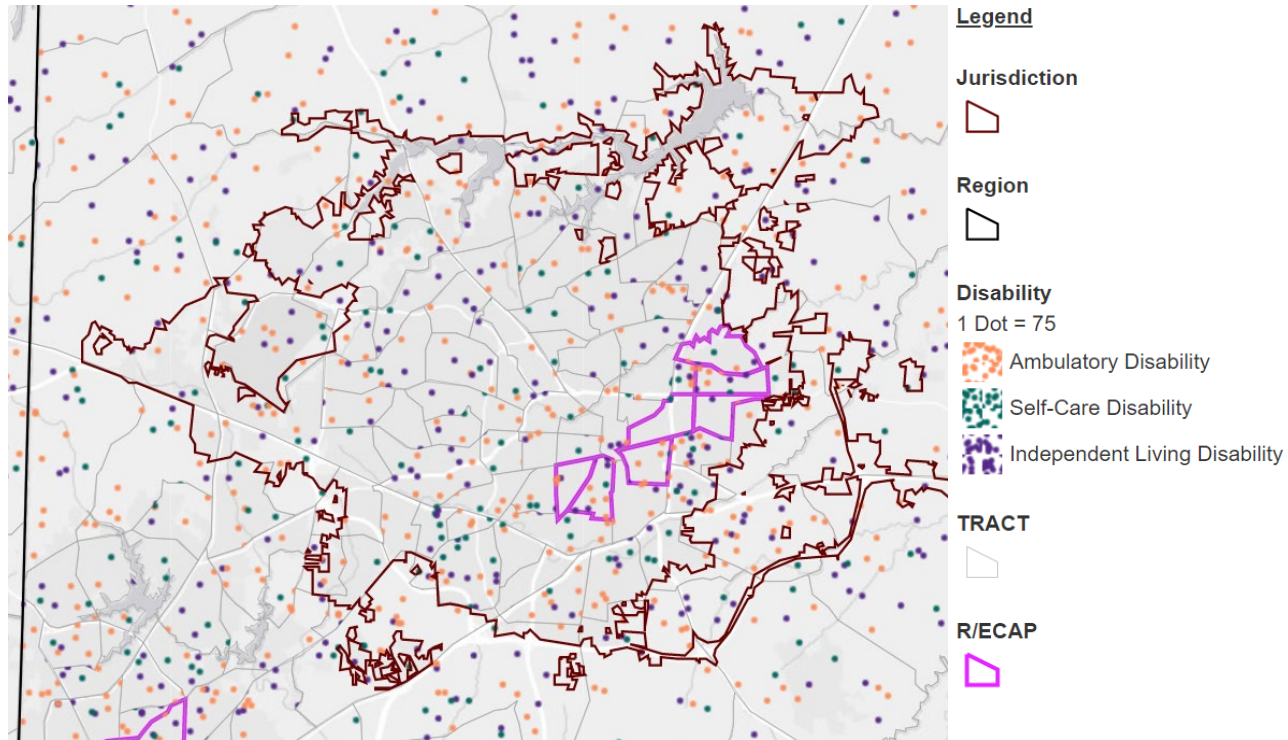
**Figure 22: Population 65 Years and Over by Block Group, Greensboro, 2017**



Source: U.S. Census Bureau, American Community Survey, 5 Year Estimates, 2013 -2017

As the dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties presents below, such pattern holds for all persons with a disability in the city of Greensboro. For example, persons with an ambulatory disability are primarily in the more residential areas along the peripheries of the city, while persons with a self-care or independent living disability are scattered throughout the city. Lastly, the map confirms that while economic factors may acutely impact persons with disabilities, there is not a clear geographic concentration of those persons in particularly R/ECAP areas of the city.

**Figure 23: Disability by Type (Ambulatory, Self-Care, Independent Living) Greensboro**



Source: Affirmatively Furthering Fair Housing Mapping Tool – Map 4, Version AFFHT004, released 2017

### Zoning and Accessibility

In recent years, the City of Greensboro has adjusted its building code to accommodate for better accessibility via wheelchair ramps to dwelling units. Moreover, as of 2019, the city has adopted the updated 2018 North Carolina Building Codes, which also seek to expand accessibility and improve general safety in residential units.

### Other Circumstances

In addition to the circumstances previously outlined in this section, residents of Greensboro with special circumstances, such as criminal histories and mental illness, face discriminatory actions that may disproportionately impact their access to fair housing choice in the jurisdiction.

### Persons with Criminal Histories

Recognizing that people of color often disproportionately have encounters with the criminal justice system, and as a result are more likely to have arrest records or criminal convictions, HUD issued guidance in 2016 warning that blanket policies of refusal to rent to people with criminal records could be discriminatory.<sup>20</sup> Although criminal history is not a protected class under the Fair Housing Act, restricting housing access on the basis of criminal history could be unlawful if it results in a disparate impact on people of a specific race or ethnicity. The likelihood of formerly incarcerated individuals and individuals who were convicted but not

<sup>20</sup>Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions, [https://www.hud.gov/sites/documents/HUD\\_OGCGUIDAPPFHASTANDCR.PDF](https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF)

incarcerated to encounter barriers to securing housing are likely to be higher than the general public. In order to affirmatively further fair housing for this group of residents, jurisdictions must affirmingly ensure that direct or indirect housing policies or practices do not have an unjustified discriminatory effect on the basis of a criminal history, even when the intent was not to discriminate.

In the context of Greensboro, stakeholder feedback and results from the community survey indicate that discrimination on the basis of criminal history is an issue for residents of Greensboro. As such, protecting against blanket policies and exclusions of persons with criminal histories, the jurisdiction must ensure that housing providers tailor their policies to avoid potentially discriminatory actions and consistently apply related policies to all applicants to consider the type of crime, time since conviction, and other factors.

### Persons with Mental Illness

In general, a mental impairment includes, but is not limited to, examples of conditions such as autism, developmental disabilities, mental illness, drug addiction, and alcoholism. Some mental impairments are readily observable, while others may be invisible. Yet, according to a report released by HUD in 2017, persons living with visible and not so visible mental disabilities face significant housing discrimination in the rental housing market compared with those who do not have such disabilities. The report, *Rental Housing Discrimination on the Basis of Mental Disabilities, Results of Pilot Testing*<sup>21</sup>, involved testing conducted in person, by phone, and by email that paired people with either a mental illness or an intellectual or other developmental disability with someone who did not have a mental disability.

The report found that, compared with individuals who did not have a mental disability, individuals with a mental illness were:

- less likely to receive a response to their inquiry about housing;
- less likely to be told an advertised unit was available;
- less likely to be invited to contact the housing provider;
- less likely to be invited to inspect the available unit;
- more likely to be encouraged to look at a different unit than the one advertised.

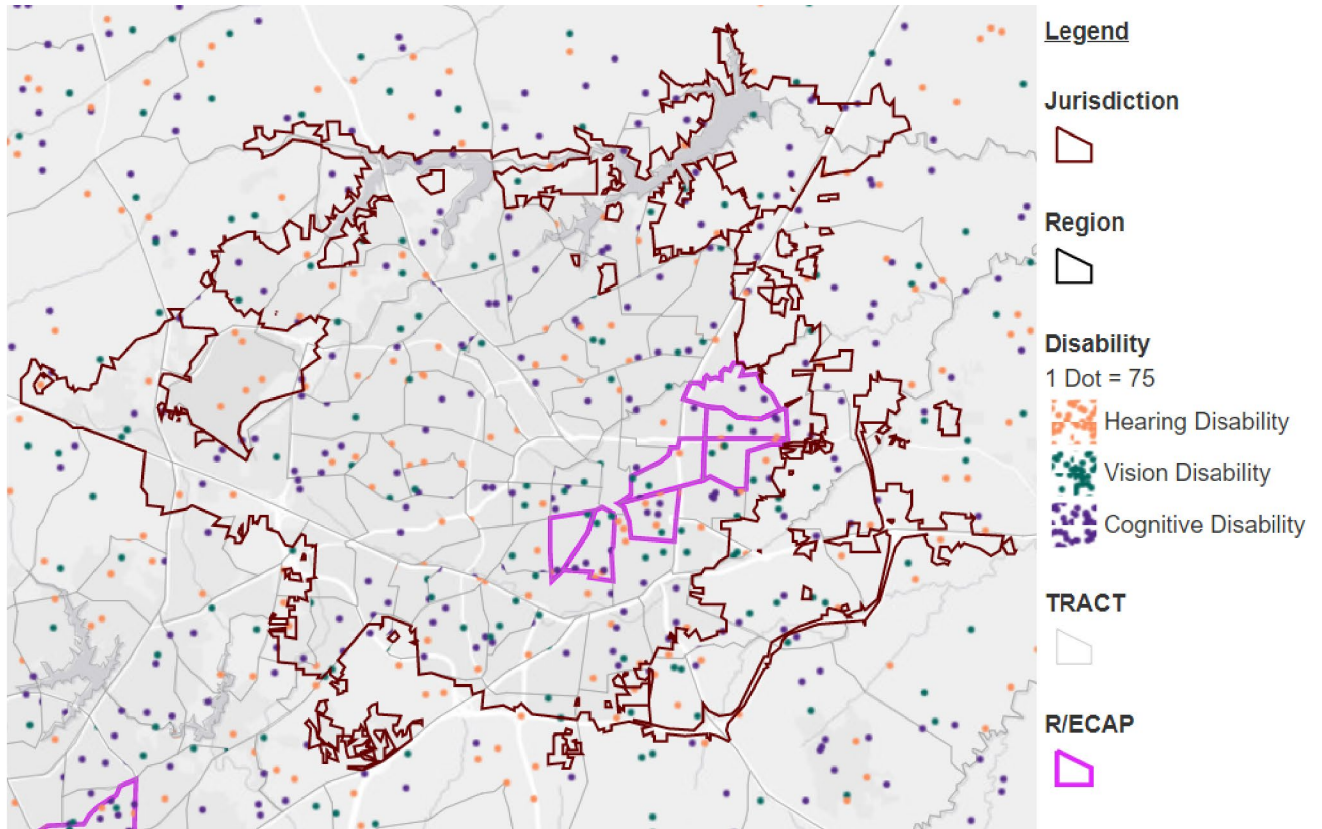
In the context of Greensboro, responses from the community survey and feedback provided by local stakeholders and housing advocates found that persons with mental illness are likely to suffer similar barriers in the area when attempting to secure adequate housing. For example, a conversation with North Carolina Legal Aid's Fair Housing Project revealed that a growing number of cases in the jurisdiction are dealing with reasonable accommodation requests from persons with a mental illness. Under the federal Fair Housing Act, as well as North Carolina's State Fair Housing Act, discrimination against a person because of disability is prohibited. In addition, housing providers are required to make reasonable accommodations in rules, policies, and procedures to allow a person with a disability to be able to use and enjoy a dwelling, including through the use of service animals and necessary provisions to facilitate landlord communication.

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<sup>21</sup>Rental Housing Discrimination on the Basis of Mental Disabilities, Results of Pilot Testing  
<https://www.huduser.gov/portal/sites/default/files/pdf/MentalDisabilities-FinalPaper.pdf>



**Figure 24: Disability by Type (Hearing, Vision, Cognitive) Greensboro**



Source: Affirmatively Furthering Fair Housing Mapping Tool – Map 4, Version AFFHT004, released 2017

## Chapter 9. Fair Housing Activities

The City of Greensboro has taken proactive steps to address and monitor fair housing activities in the area. The following section provides a snapshot of some of the programs spearheaded by the City of Greensboro that leverage federal and local funding to foster community development and further fair housing choice in the area since 2015. In addition to such work, the city has been actively monitoring and mitigating local fair housing complaints. This section also outlines fair housing complaint trends at the county and local level.

### Community Development Programs

In 2016 city voters approved a \$25 million Housing Bond and a \$34 million Community and Economic Development Bond referendum which were committed to projects in the 2017-2018 fiscal year. As part of such efforts, the adoption of a moderate-income definition for bond-funded projects of up to 120 percent of area median income for small (1 or 2 person) households and 140 percent of area median income for larger (3+ person) households was established by the city to promote a more mixed-income approach in its affordable housing and neighborhood development strategies.

Moreover, based on information provided in the city's most recent Consolidated Annual Performance and Evaluation Report (CAPER), the city was awarded a \$2.9 million HUD Lead-Based Paint Hazard Control and Healthy Homes Grant, which will be used to make at least 165 housing units lead safe over the 2017-2020 timeframe. CDBG funds were provided to match the construction and in-kind services of the new funding opportunity.

Finally, in 2018 the City of Greensboro and the Community Foundation of Greater Greensboro partnered to raise funds for the creation of a Housing Hub – where six local housing organizations have co-located to provide a one-stop center for housing assistance ranging from homelessness services to homeownership opportunities. The Housing Hub cooperative model was tested in April 2018 when the eastern portion of the city was impacted by an EF-2 tornado that caused damage to over 1,000 assessed properties. The community and the Housing Hub team quickly learned to leverage each other's strengths and develop service models to address the needs. Repair and restoration work will be an ongoing focus for city programs.

In addition to such work, the City of Greensboro has made significant strides to leverage existing federal and local community development programs to further fair housing choice in the area.

### Federal Community Development Programs

The City's 2015-2019 Consolidated Plan provides the framework for the use of federal funds to address housing and community needs in Greensboro. The 2015-2019 Consolidated Plan also established the following three priorities for federal and local funding allocations:

1. *Increase the supply of affordable housing*
2. *Promote a suitable living environment*
3. *Expand economic opportunities*

### Community Development Block Grants

In line with the priorities outlined, the city continued its CDBG programs of housing rehabilitation, acquisition, and public services grants (including \$176,130 for emergency shelter operations) and Section 108 loan repayment. As the table below showcases, over 1,113 households were provided housing



assistance through CDBG funds during the 2017-2018 program year. The majority of those households, 818, were Black or African American.

**Table 39: Assistance to Racial and Ethnic Populations by Source of Funds, 2017-2018**

	CDBG	HOME	ESG	HOPWA
White	246	3	13	9
Black or African American	818	26	86	61
Asian	3	0	0	0
American Indian/Alaskan Native	13	1	0	0
Native Hawaiian/Other Pacific Islander	2	0	0	0
Black or African American and White	0	0	0	0
American Indian/Alaskan Native and White	11	0	0	0
American Indian/Alaskan Native and Black/African American	7	1	0	0
Other multi-racial	6	1	1	0
Total	1,113	32	100	70
Hispanic	46	1	6	0
Not Hispanic	1,067	31	94	70

Source: City of Greensboro CAPER 2017-2018

*HOME*

In the 2017-2018 program year, there was one new affordable multi-family housing development completed consisting of 14 HOME-assisted and 58 unassisted units. Two houses were rehabilitated and resold to low-mod income homebuyers, seven homeowner rehabilitations were completed, and 12 households received down payment assistance. Moreover, the city acquired and demolished a property located at 326 East Gate City Boulevard. This is one of only two parcels in the entire block not already under control for the purpose of redevelopment. This parcel will be assembled with adjacent parcels for future redevelopment in the Ole Asheboro Redevelopment Area.

As the table below shows, only about \$339,170 of the \$4 million of HOME funds available were spent during the 2017-2018 program year.

**Table 40: Greensboro Entitlement Fund Resources Available by Source, PY 2017-2018**

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$4,391,911	\$2,163,842
HOME	\$4,242,567	\$339,170
HOPWA	\$370,437	\$229,263
ESG	\$182,064	\$120,749

Source: City of Greensboro CAPER 2017-2018





*Homelessness*

The Guilford Continuum of Care (CoC) continues to maintain its efforts to readily assist households experiencing unsheltered homelessness. The city has been participating with the CoC to implement an efficient, effective Coordinated Entry system. The Coordinated Entry concept is not only mandated by HUD, but it also is a key element of a Housing First-focused system, providing an organized and equitable method of entry and assessment for services. Once fully established, all persons experiencing a housing crisis will be able to begin seeking resources through a “no wrong door” system, wherein any emergency shelter can enroll and evaluate applicants.

In addition to such work, the City’s Homelessness Prevention funds support a Rapid Rehousing Program. The Rapid Rehousing model is a national best practice in helping to end homelessness. Residents enrolled in the rapid rehousing program are provided case management with intense wrap-around services and assistance with accessing mainstream benefits. Rapid Rehousing case managers participate in weekly coordinated assessment meetings to connect their clients to housing resources in the community. After a client is moved into permanent housing, a case manager provides ongoing support and financial assistance to help the client maintain housing for as long as the client remains in the program.

The city plans to continue efforts to expand available services where needed and address the growing need to meet the gap between homelessness and the array of factors that may lead to homelessness in the area.

<b>Table 41: Shelter Capacity in Greensboro, 2017-2018</b>	
Number of New Units – Rehabbed	0
Number of New Units – Conversion	0
Total Number of Beds - Nights Available	13,870
Total Number of Beds - Nights Provided	12,045
Capacity Utilization	87%
<i>Source: City of Greensboro CAPER, 2017-2018</i>	

*Emergency Solutions Grants (ESG)*

During the 2017-2018 time period, CDBG funds were used to support emergency shelter operations in Greensboro. Moreover, ESG funds were used to rapidly rehouse homeless persons. Lastly, the City, Partners Ending Homelessness and the Guilford County Continuum of Care (COC) collaborate on a yearly basis to allocate available funding on a comprehensive basis. Proposed activities are evaluated by the COC’s System Performance and Evaluation Committee to determine the funding allocation and whether to award funding based on the best use of overall monetary resources, priorities, performance and project scoring.

<b>Table 42: Total ESG Expenditures</b>			
	<b>2015</b>	<b>2016</b>	<b>2017</b>
Total ESG Funds Expended	\$234,367	\$217,425	\$42,942
<i>Source: City of Greensboro CAPER, 2017-2018</i>			



**Table 43: Expenditures for Emergency Shelter, Greensboro**

<b>Dollar Amount of Expenditures in Program Year</b>			
	<b>2015</b>	<b>2016</b>	<b>2017</b>
Essential Services	0	0	0
Operations	24,116	7,726	17,286
Renovation	0	0	
Major Rehab	0	0	0
Conversion	0	0	0
<b>Subtotal</b>	<b>24,116</b>	<b>7,726</b>	<b>17,286</b>

*Source: City of Greensboro CAPER, 2017-2018*

*HOPWA*

HOPWA funds are generally made available for households living with HIV/AIDS in regions known as Eligible Metropolitan Statistical Area (EMSA). In the case of Greensboro, the EMSA includes the counties of Guilford, Rockingham, and Randolph.

Based on the information on the City’s latest CAPER, the HOPWA program was successful in enabling HOPWA beneficiaries to access a stable living environment through TBRA vouchers. The proposed goal was exceeded by 23 clients. Central Carolina Health Network, the organization that administers the HOPWA grant, negotiated with the local housing authorities to move clients from HOPWA TBRA vouchers to Choice Housing Voucher Program (Section 8). This transition allowed new clients to be served and reduced the Guilford County waiting list from 53 to 43 from 2017 to 2018.

**Table 44: HOPWA Number of Households Served, 2017-2018**

	<b>One-year Goal</b>	<b>Actual</b>
Short-term rent, mortgage, and utility assistance payments	0	0
Tenant-based rental assistance	47	70
Units provided in transitional housing facilities developed, leased, or operated with HOPWA funds	0	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	0
<b>Total</b>	<b>47</b>	<b>70</b>

*Source: City of Greensboro CAPER, 2017-2018*

Local Programs

In addition to the federal programs previously outlined, the City of Greensboro has tailored the following local programs to address the housing and community needs of local residents.

*Accessibility*

The city administers a county-wide rehabilitation program that benefits underserved eligible households inside and outside of the entitlement areas of Greensboro and High Point. The program is designed to



improve the accessibility of homes for occupants who are physically disabled. The program also extends the ability of multifamily rental housing projects to access funding to improve accessibility. Funding up to \$15,000 per unit, not to exceed \$45,000 per housing structure is available as a grant. Allocated funds have been used to repair homes, improve accessibility, increase energy efficiency, and remediate lead-based paint and other environmental hazards.

The City's Fair Housing Office has been active in providing training and resources to Code Compliance and other city departments to disseminate the importance of ensuring accessibility to all residents of the city. Such discussions and meetings have led to adjustments to the local building codes to more effectively facilitate the construction of wheelchair ramps and other accessibility features.

### Lead-Based Paint

LBP (lead-based paint) remediation has been an integral part of the City's Neighborhood Development rehabilitation program. Rehabilitations of owner-occupied homes are tested for lead-based paint and any LBP found is appropriately remediated. The city continues to address LBP hazards through its housing rehabilitation programs for owner-occupied and multifamily housing built prior to 1978, by offering grants up to \$22K for properties with 1-3 units and up to \$7.5K per unit for four or more-unit properties. The city also addresses LBP hazards through code compliance enforcement initiatives. City housing program staff provide education and outreach on lead hazards through the neighborhood and other community events. All contractors in the city's rehabilitation program are lead certified and conduct repairs in compliance with federal regulations. In recent years, the city was a recipient of a \$2.9 million Lead-Based Paint Hazard Control and Healthy Homes grant.

### Multi-Family Development

As multi-family projects are funded with the new Housing Bond, there will be a significant increase in the number of units reported through the production of new units and rehabilitation of existing units in the next few years. Moreover, large development projects are planned for the redevelopment areas which will further increase multi-family development. The city's enhanced down payment assistance program, which provides loans to assist affordable housing developers with building and/or rehabilitating affordable multifamily units is already driving a substantial increase in program applications and loan closings.

Based on figures reported in the city's latest CAPER, in total there were 98 households supported through rapid rehousing rental assistance and 140 households supported through production activities for a total of 238 households supported between 2017-2018, compared to the one-year goal of 98 households.

### Rental Housing Improvement

Though not the most popular program currently promoted by the city, the Housing Rehabilitation program allows landlords of rental properties of seven units or less to use city contractors for rehabilitation services or to meet city building code standards through the program. The program offers a maximum of \$20,000 in funding and offers an incentive grant of \$2,000 for properties that are vacant.

Landlords do have to contribute to some of the costs, which has limited participation. The typical contribution for a project is capped at \$20K to \$40K per project, depending on unit count and severity of repairs. In general, the city has done 1 to 2 small properties (or less 7 units) per year through this program.





### Housing Rehabilitation

Under Housing Rehabilitation programs, the Housing Reclamation program allows the city to rehabilitate and sell properties that are under a Housing Commission Resolution for Demolition. The program is intended to arm the city with a mechanism for preserving existing housing stock located in redevelopment areas that are slated for demolition.

### Housing Discrimination

The City's Fair Housing Office conferred with UNC-Greensboro for the testing framework for a study to determine the level of rental housing discrimination aimed at the LGBTQ community. The study was a telephonic test for marital status/same-sex unions/couples.

Lastly, the city selected UNC-Greensboro to carry out the outreach and evaluation portion of the Lead-Based Paint Hazard Control and Healthy Homes grant. The Center for New North Carolinians at UNC-G has helped by providing access, translation and education services about the dangers of lead-based paint to the immigrant and refugee communities in their native languages and assist households with program applications.

### Other Initiatives

In 2016, the City of Greensboro and the Community Foundation of Greater Greensboro (CFGG) led a community process aimed at creating a shared housing vision for a successful, sustainable, affordable housing initiative for all residents. Through such planning process, working committees were developed for Housing Stock, Housing Access and Services, and Long-term Structure and Resources. These committees continue to bring together public entities, private developers, non-profit corporations and community representatives to discuss housing policy, issues, and options for future development. Recommendations from these communities will be incorporated into the Consolidated Plan and Comprehensive Plan Update processes and 10-year Affordable Housing Plan.

### Fair Housing Lawsuits and Complaints

In North Carolina, fair housing laws are found at the federal, state, and, in some jurisdictions, local level. Which set of laws apply in a particular situation generally depends on where the alleged housing discrimination occurred.

While federal housing laws and complaints are generally handled through the mandate provided through the Federal Housing Act, residents in North Carolina are also protected from housing discrimination under the North Carolina State Fair Housing Act (N.C. Gen. Stat. § 41A-1, et seq.) The State FHA continues to be certified by HUD as "substantially equivalent" to the federal FHA.

At the municipal level, five jurisdictions in North Carolina, the City of Durham, the City of Greensboro, the City of Winston-Salem, Orange County, and the City of Charlotte-Mecklenburg County, have local fair housing ordinances that have been certified by HUD as "substantially equivalent" to the federal FHA. These jurisdictions receive federal funding under the Fair Housing Assistance Program to, among other tasks, investigate and attempt to resolve complaints.

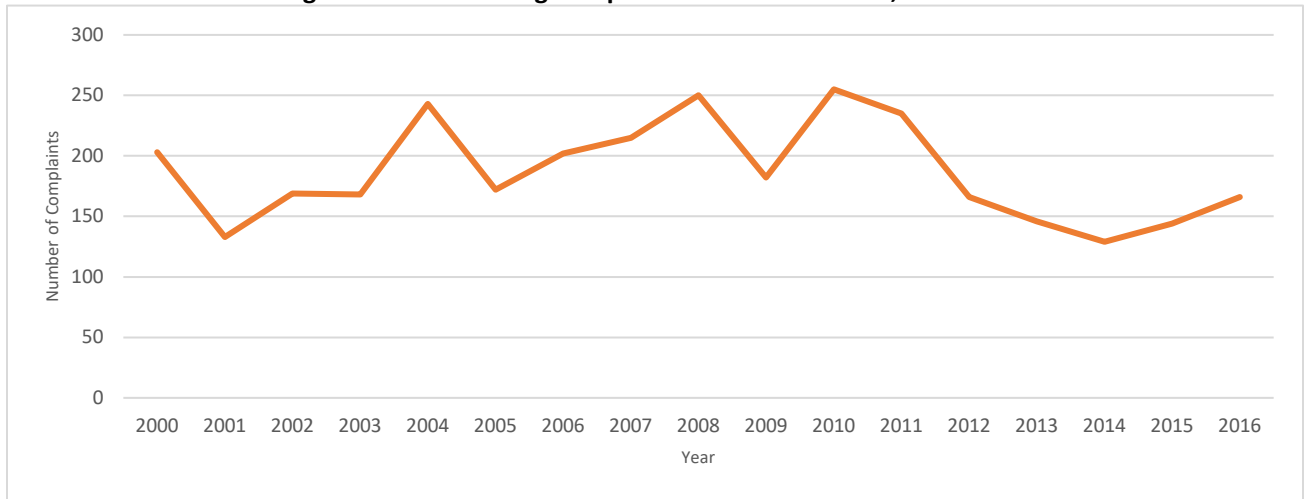
In general, under the FHA, individuals who have experienced housing discrimination may file an administrative complaint with HUD, a civil suit in court, or both. Because the State FHA and five local fair housing ordinances have been designated by HUD to be "substantially equivalent" to the federal FHA,

virtually all administrative complaints in North Carolina filed with HUD will be referred to the NCHRC or to one of the five substantially equivalent local fair housing enforcement agencies for investigation and potential resolution. In addition to investigating cases referred by HUD, the NCHRC, as well as the five local “substantially equivalent” fair housing agencies, accepts complaints of housing discrimination filed with them directly.

### Statewide Fair Housing Complaints

Based on data provided through the Fair Housing Act, since 2010 the number of Fair Housing Complaint Cases in North Carolina dropped from 255 to 166 in 2016. Such a 53 percent decrease in cases filed has been particularly evident in cases with a Race Basis, which fell from 125 in 2010 to 53 in 2016. At the same time, cases involving a disability have risen in the state from 82 in 2010 to 90 in 2016.

**Figure 25: Fair Housing Complaints in North Carolina, 2000-2016**



Source: U.S. Department of Housing and Urban Development FHEO Filed Cases

### County Level Fair Housing Complaints

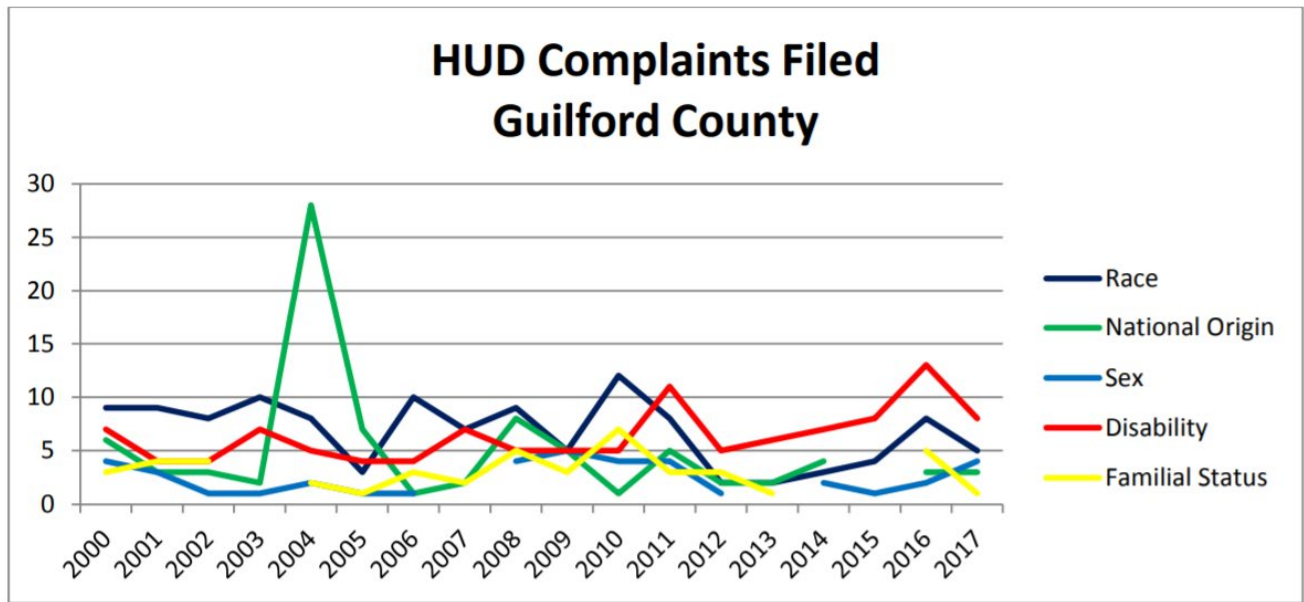
At the county level, according to the *State of Fair Housing In North Carolina 2018 Report*, from 2000 to 2017, the counties with the most complaints filed were Mecklenburg (571 complaints), Durham (491), Guilford (314), Wake (276), and Buncombe (205). In a per capita basis, the complaints filed in those counties were: Durham (183.5 complaints per 100,000 people), Orange (98.7), Buncombe (86.0), Guilford (64.3), and Mecklenburg (62.1).<sup>22</sup>

Overall, while complaints filed in Guilford County based on race decreased since 2010, following similar statewide trends, complaints filed on the basis of disability rose from 5 cases in 2010 to nearly 15 in 2016.

<sup>22</sup> <https://www.fairhousingnc.org/wp-content/uploads/2018/12/2018-12-5-State-of-Fair-Housing-in-North-Carolina-FINAL-Approved-Map.pdf>

At the same time, while cases involving National Origin have sharply decreased in the county since 2004, the emergence of new complaints since 2016 may require additional attention as immigrant populations continue to grow in the area.

**Figure 26: Fair Housing Complaints Over Time by Type in Guilford County, 2000-2017**



Source: FHP analysis of HUD complaint data.

### Greensboro Fair Housing Complaints

At the city level, the Fair Housing Division of the Human Relations Department investigates complaints of discrimination in housing. In addition to the federal and state laws, as previously mentioned, the City of Greensboro also has a Fair Housing Ordinance that protects people from discrimination in housing based on race, color, religion, national origin, handicap (physical and mental disability), and family status (families with children under 18 including single parents, adopted children, and pregnant women). In addition to handling Fair Housing Cases, the Fair Housing Division has also launched a Landlord-Tenant Dispute Program to mediate cases between landlords and tenants to avoid legal entanglements and diffuse potential issues. In the last few years, the Landlord-Tenant Dispute Program has averaged about 300 calls per year.

In the last three years, the Fair Housing Division has averaged 20 to 30 cases per year, which is a number higher than the number expected to be handled by the office given the size of the city. Similar to statewide and county trends, cases on a basis of disability have remained steady during the last three years. Moreover, cases related to national origin have also risen with the arrival of new immigrant populations in the city.



From June 2018 to June 2019, the Fair Housing Division handled 11 cases, with five of those cases involving a disability. Though there are currently no discrimination suits filed by the Department of Justice in the city, cases involving domestic violence and mental health may have enough gravity in the future to warrant such steps.

In addition to the investigative and enforcement roles of the division, the team of four is actively working with other city departments, such as Neighborhood Development, which also includes Code Compliance, to train personnel on fair housing legal issues. Furthermore, the division conducts strategic trainings and outreach meetings with community members, stakeholders, and private sector realtors and brokers to disseminate the importance of fair housing laws in the city. Down the road, the team will continue to monitor existing fair housing issues and remain diligent about emergent issues, such as evictions, displacement, and transition housing, that may have an impact on fair housing choice in the jurisdiction.

## Chapter 10. Identification of Impediments

The following section provides an overview of past and current impediments to fair housing choice. Previous impediments were identified on a regional level through the Assessment of Fair Housing process.

### Previous Impediments

The following impediments were identified in the 2014 Regional Assessment of Fair Housing Strategies for the City of Greensboro:

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

### Past Fair Housing Goals

To address identified barriers, the City of Greensboro set the following goals in the 2014 Regional Assessment of Fair Housing Strategies:

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

- The City continues to invest in existing housing rehabilitation programs including special programs for units under Code Compliance actions and lead-based paint hazard remediation.
- The City has enhanced its down payment assistance program to include a \$5,000 bonus for purchase of a house in a Redevelopment Area.
- The City continues to provide homeownership counseling and education targeted to lower income households.

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

- The City continues to invest CDBG funds in the identified Redevelopment Areas in support of the housing and neighborhood objectives outlined in the Redevelopment Area plans. The City's Affordable Housing Development request for proposals process awards points for projects which meet the objectives of adopted city plans.

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

- The Mobility Greensboro Transit Plan produced a new route structure in 2019 to help address these disparities.
- In addition to the Mobility Greensboro Transit Plan, the Metropolitan Transportation Plan and ongoing Comprehensive Plan have found other ways to address such disparities, such as greater linkage between land use and transportation and the expansion of Transit-Oriented Development strategies.

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

- The City's request for proposals process encourages development in higher opportunity areas through the allocation of scoring points for location and amenities. The Sumner Ridge Apartments multi-family project was developed in a higher opportunity area.
- The City increased its down payment assistance program limit to improve affordability in higher opportunity areas.
- As part of the Comprehensive Plan Update process, the City has sponsored a speaker series to bring in national experts to raise awareness of development options and best practices. The following sessions were held in recent years:
  - Dan Parolek – Missing Middle: Responding to the Demand for Walkable Urban Living, 10/19/2017
  - Geoff Anderson – Growing an Amazing City: Greensboro, 11/28/2017
  - Alan Mallach – Middle Neighborhoods, 11/29/2017

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

- The City's Human Relations Department conducted 22 fair housing trainings and/or outreach events in the fiscal year 2017-2018 to educate residents, landlords, and other agencies on what fair housing means and how the city can assist. With an increase in education, outreach, and advertising for fair housing assistance, the Fair Housing Assistance Program received 14 cases during the fiscal year. Of the 14 cases, 2 were withdrawn, 3 were deemed cause, 4 were deemed no cause, 1 reached conciliation/settlement, and 4 are currently open cases.



## 2019 Impediments to Fair Housing Choice

The following impediments are based on the research and analysis conducted in Chapters 3 through 9, including the results of the consultations provided in Chapter 2. The current impediments to fair housing choice are complex and will involve a collective effort to address. Many of these impediments are the result of, or continue to be, fueled by longstanding structures and institutions that are outside the immediate influence of the City of Greensboro. The following impediments are in no particular order and are not weighted in any way. Additionally, impediments to fair housing choice have been identified and included for populations outside of the protected classes.

### **Zoning - Some zoning standards and requirements related to the location of social services, SROs, and manufactured homes may reduce access to housing opportunities.**

An analysis of Greensboro's local zoning standards and requirements was completed using a 2016 Joint Statement of the Department of Housing and the Department of Justice as a guidance. The Joint Statement helps address state and local land use laws and practices in the context of the Fair Housing Act.<sup>23</sup> While the City has made strides to accommodate social service providers and developers as they develop varied housing types, some existing standards have the potential to impact housing choice and discourage the development of housing that meets the needs of protected classes. The following zoning standards and requirements have the potential to limit fair housing choice for protected classes.

- The site selection and location of social services, such as homeless shelters and group homes, is limited by zoning ordinances that place a buffer of 1/4 mile on the location of existing and new social service facilities.
- Local land use and zoning ordinances limit the site selection and location of new Single Room Occupancy (SRO) properties under additional use standards to specific zoning districts of the city. While the conversion of existing hotels and motels to SROs are allowed and exempted from such restrictions, current standards may create additional barriers in providing access to SRO's to protected classes in Greensboro.
- Certain ordinances requiring minimum floor space, such as those requiring at least 70 square feet for an SRO unit or five square feet of common living space per rooming unit in SROs, may increase the size and cost of housing, particularly for vulnerable or protected classes in the city.
- The location of manufactured homes in the city is established through a Manufactured Housing Overlay District. Such special districts have a high risk of imposing an additional burden to homebuyers hoping to use a manufactured home as a low-cost ownership option.

### **Reasonable Accommodation - The lack of an official mechanism for reasonable accommodations to zoning ordinances, land use practices, general rules, practices, or services to be formally requested or reviewed create an additional barrier for residents seeking such accommodations, particularly persons with disabilities and the elderly.**

Although other mechanisms are in place, a review of zoning code revealed a lack of an official mechanism for reasonable accommodations zoning ordinances, land use practices, general rules, practices, or services.

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<sup>23</sup> <https://www.justice.gov/crt/page/file/909956/download>

**NIMBYism - Local pushback and potential rejection of multifamily developments and supportive housing for persons who are homeless or disabled in certain areas of the city is an ongoing challenge for Greensboro.**

Conversations with stakeholders pointed to NIMBYism as being critical to the area. Examples of this perception have included push-back on multifamily development, pushback on the location of mobile home parks within city limits, and feedback on the resettlement of recent refugees in areas of the city.

**Segregation - Historic segregation patterns continue to hinder the location and expansion of affordable and supportive housing in areas of the city.**

Affordable and supportive housing options continue to be most prevalent in low-income areas of the city, which includes current and historically segregated neighborhoods. For example, affordable units are primarily found in eastern portions of Greensboro and along the peripheries of the city, including older single-family housing stock and multi-family developments in need of repair. Though supportive housing is present outside of R/ECAP areas and zones once redlined, for the most part supportive housing is over represented in the eastern areas of Greensboro. Though strides have been made through programmatic changes and investments, a continued effort to connect and coordinate private and public funding in historically segregated areas continues to be challenging. Specific areas of attention include:

- Supportive housing units have been added to historically segregated neighborhoods already experiencing an overconcentration of supportive housing units.
- A lack of affordable housing outside of historically segregated areas.
- A concentration of older multifamily developments in need of repair in historically segregated areas.
- Lack of coordinated private investments in historically segregated areas.
- A gap in comprehensive strategies that connect public investment to expanded opportunities in historically segregated areas.
- A recent concentration of foreclosures in historically segregated areas.

**Access to Adequate Housing - Lack of sufficient production of affordable housing units and overall poor rental housing conditions limit mobility and housing choice for residents.**

In addition to the analysis in Chapter 3 and Chapter 9, stakeholders reported that high quality affordable units were difficult to secure. Naturally affordable units are in disrepair, while the process to obtain a Housing Choice Voucher was time consuming and difficult. With a vacancy rate of 13 percent, the supply of housing appears to be available but does not readily meet the needs of residents, particularly low-income residents and other protected classes in the community. Additionally, the location of affordable housing units does not always correlate with hubs of economic activity and access to public transit. Additional elements include:

- Publicly supported housing choices are increasingly more limited, particularly traditional public housing units, for households earning 30% or less of the area's median income.
- A mismatch between current market production and community needs, in terms of price points, housing types, and location, leads to less housing options overall for protected classes and low-income families.

**Access to Adequate Housing (continued)**

- Naturally occurring affordable housing units are dwindling and often in poor condition.
- Current production of affordable housing units does not always consider access to jobs or transit.

**Economic Stability - Ensuring economic stability for residents experiencing high levels of cost burden.**

Data and feedback provided by stakeholders highlight the fact that main causes of inadequate housing access and higher housing costs across the jurisdiction are often rooted in lack of economic stability, particularly for families struggling to make ends meet and who are often one missed paycheck away from eviction or homelessness. As housing costs continue to increase, providing economic stability for families will ensure that residents are able to weather such difficulties and retain adequate access to housing.

**Immigrants and Refugees - Newly arrived immigrant and refugee communities face a complex array of housing challenges.**

There has been an increase in fair housing complaints and recent notable events, such as an apartment complex fire, that point to a growing need to identify the needs of immigrant and refugees in the area as its own barrier. Feedback from stakeholder groups and community meetings indicates housing complaints by immigrant and refugee are underreported, yet a growing issue as landlords appear to be taken advantage of cultural and linguistic gaps. Additional concerns include:

- Limited personal assets, community resources, and housing options for immigrant and refugee populations lead to inadequate housing access and potential discriminatory actions based on national origin.
- Cultural, social, and linguistic gaps often allow for immigrant and refugee communities to be targeted or perceived by landlords as tenants to take advantage of.

**Disability - Persons with disabilities experience additional barriers in securing and maintaining adequate housing.**

Though the City of Greensboro has made great strides to make changes to its building and land use codes to better accommodate persons with disability, given the dispersal of persons with disability in the city and the current housing stock, there is a general lack of access to enough accessible units at different price points for persons with disability. Additionally, feedback provided by stakeholders pointed to known barriers for persons with a disability using a service animal, particularly emotional support animals.

**Special Circumstances - Barriers persist for residents facing special circumstances that limit mobility and housing choice.**

In addition to individuals and households that fall into the protected classes, stakeholder feedback noted that persons with mental disorders often face additional hurdles to maintain adequate housing. Moreover, residents with a criminal history face discrimination in securing and maintaining housing. Specifically:

- Persons with mental disorders, such as anxiety, require reasonable accommodations that are not always met by landlords.
- Discrimination on the basis of criminal history is an issue for many residents of Greensboro who have a hard time securing or qualifying for housing due to their criminal history.

**Supportive Housing - Lack of efficient coordination and communication among supportive housing providers has eroded trust and quality of services to residents.**

Based on feedback from stakeholders, a general lack of communication and trust within the Continuum of Care (CoC) structure and participating members has led to inefficient communication and data collection, which ultimately impact the availability of current and future supportive housing programs.

[Recommendations and Proposed Actions](#)

**Recommendation 1: Study, refine, and clarify zoning standards and requirements.**

- Clearly document rationale for zoning buffers around social service facilities and demonstrate willingness to adjust if issues arise in the long term. For example, the current ordinance requires any new social service facility (which are allowed in the C-M, CB, and PI zoning districts) to be located 1/4 mile from another social service facility or group care facility. A group care facility is separately required to be 1/2 mile from another group care facility. This 1/2 mile separation (from the same use) is applied to family care homes, group care facilities and chartered homes.
- Though Single Room Occupancy (SRO) properties are already allowed in most multifamily (RM) zoning districts, several mixed use (MU) districts, office (O), central business (CB) and public and institutional zoning districts, consider amending the zoning and land use code to provide greater flexibility across zoning areas where residential housing allowed for SROs, particularly if certain conditions are met, such as proximity to transit, social services, or mixed-use facilities.
- Clarify rationale of square footage requirements for minimum floor space and common space in Single Room Occupancy (SRO) properties. Exceptions based on reasonable accommodation or a set of criteria, such as proximity to transit or social services should be further explored.
- Establish clear justification for the special district for manufactured housing. Consider adding flexibility in the code, such as allowing manufacturing homes near transit hubs or near areas lacking affordable housing production, to allow for reasonable accommodation and exemptions from a particular criteria based on community input will allow for potential barriers to be lessened or avoided.
- Work with stakeholders to clarify and promote the existing Variance and Special Exception process, identify best practices for reasonable accommodation clause, and explore adding a reasonable accommodation clause into zoning and land use ordinances.

**Recommendation 2: Educate residents on supportive and affordable housing development and assess NIMBYism in Greensboro.**

- Promote volunteerism within existing supportive housing efforts to build a network of supporters.
- Develop and distribute clear and accurate information on developments that respond directly to public misgivings.
- Engage a diverse set of community leaders early in the planning process.
- Develop guidelines that establish how plans will include community character as a criterion.
- Create neighborhood advisory councils that provide feedback on potential developments in the area.
- Conduct an assessment, such as HUD's NIMBY Decision Tree to determine how much NIMBYism may be preventing fair housing choice.

**Recommendation 3: Implement strategies and programs identified in the 10-Year Affordable Housing Plan to strategically invest in segregated communities.**

- Moving forward, the City should take a look at its rehabilitation programs to ensure that multifamily landlords and developments in historically segregated areas can take advantage of the opportunity to upgrade facilities in a manner that keeps rents affordable and yet improves the quality of the dwellings.
- Retool existing programs or creating new programs that focus on preserving naturally occurring affordable units.
- Efforts to educate homeowners and to provide financial literacy courses to ensure that potential delinquent mortgages are identified early on should be expanded in current programs offered by the City.

**Recommendation 4: Implement strategies and programs identified in the 10-Year Affordable Housing Plan to expand access to opportunity for low to moderate income residents.**

- As part of the 10-Year Affordable Housing Plan, capturing ways to increase affordable housing options throughout the city should be a priority.
- The comprehensive Affordable Housing Plan currently being undertaken should consider this concentration to retool current and future programs to strategically distrust supportive housing.
- Expanding scoring criteria on future funding sources based on access to jobs or transit should incentivize a greater production of affordable housing units in desired locations.

**Recommendation 5: Create and maintain strong collaborative relationships with community development and housing entities throughout the region.**

- Current planning efforts should ensure that synergy between departments and projects consider the historical circumstances of neighborhoods in order to promote future wellbeing and rectify gaps.
- Current partnerships between the City, the Public Housing Authority, and local developers should continue to explore ways to meet any potential gaps in housing needs for extremely low income residents.

**Recommendation 6: Continuing to focus on workforce training programs and other means to stabilize and promote the local workforce should provide some relief and resources for struggling families.**

- Encourage existing programs to assist individuals with accessing gainful, livable wages that lead to economic stability.
- Leverage catalytic infrastructure investments to expand economic development and access to greater opportunities.

**Recommendation 7: Support and educate newly arrived immigrant and refugee communities and stakeholders, including landlords and service providers.**

- Continue to promote the work the City's International Advisory Committee (IAC) has done to raise awareness about housing resources and addressing cultural barriers.
- Assess the effectiveness of current efforts to provide translated materials and cultural awareness training to ensure that the latest trends or concerns are included.
- Expand the delivery of translated housing-related and other service-related documents, cultural awareness training, and general language access services and resources to residents.
- Expand partnerships with local organizations to build trust and greater communication with immigrant and refugee populations.



## Appendix A – Public Hearing

City of Greensboro Meeting Agenda – Will include PDF of Agenda in Final Draft





## Appendix B – Public Comment

The following was posted on the City of Greensboro’s website.

<https://www.greensboro-nc.gov/Home/Components/News/News/14145/36?npage=2>

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### City News

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#### Comments Welcomed on Draft Analysis of Impediments to Fair Housing Choice

**Post Date:** 10/15/2019

Residents are encouraged to review the draft [Analysis of Impediments to Fair Housing Choice \(AI\)](#) now through November 15 and send written or verbal comments to Caitlin Bowers, Neighborhood Development Department’s community development analyst, by [email](#) or calling 336-433-7266.

Public input on the analysis provided now will be considered during the writing of the final report to help identify barriers to fair housing choice throughout the city.

As a recipient of federal Housing and Urban Development (HUD) funding, the City is required to conduct a Five-Year Consolidated Plan to develop housing programs and priorities for grant program years 2020-24. As a condition of the Consolidated Plan, the City is required to affirmatively further fair housing. To help accomplish this, the Analysis of Impediments to Fair Housing Choice (AI) is conducted every five years prior to the implementation of the HUD-mandated Consolidated Plan.

PDF of GRRRA will be included