



# 2022-2026 Analysis of Impediments to Fair Housing

Union County Community Development Block Grant  
Entitlement Program (CDBG)

May 2022

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## EXECUTIVE SUMMARY

Union County is located in the Central Piedmont region of North Carolina and included in the Charlotte-Concord-Gastonia, NC-SC Metropolitan Statistical Area (MSA). According to the U.S. Census Bureau, Union County is the 23<sup>rd</sup> largest county in North Carolina by total area. Union



County has a total area of 640 square miles, of which 632 square miles is land and 8 square miles is water. The total population of Union County according to the 2020 Decennial Census is 238,297. Union County is made up of the City of Monroe, the Towns of Waxhaw, Indian Trail, Weddington, Marshville, Wingate, Marvin, Unionville, Matthews, Fairview, Lake Park, Wesley Chapel, Mineral Springs, and Hemby Bridge.

Union County is an entitlement community designated under the United States Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program. Union County's CDBG Grant Program area consists of Marshville, Monroe, Stallings, Waxhaw, Weddington, Wingate, Fairview, Indian Trail, Wesley Chapel, Mineral Springs, and unincorporated areas (see Map 1 in Appendix E). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." The County is committed to demonstrate to HUD and the community that the County is affirmatively furthering fair housing. To that end, Union County has completed a fair housing study known as an Analysis of Impediments to Fair Housing Choice (AI) to ensure that HUD-funded programs are being administered in a manner that affirmatively furthers fair housing for federally protected classes.

Affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development. (24 CFR 5.152)



The Analysis of Impediments to Fair Housing Choice (AIFH) is a comprehensive review of municipal housing, economic and transportation conditions, and public and private sector policies that ensure that housing choices and opportunities for citizens in a community are available. The goal of this analysis is to identify any barriers to fair housing choice for protected classes and to develop recommendations Union County can implement to address barriers that exist for fair housing choice for residents.

HUD has a commitment to eliminate discriminatory practices in housing and an obligation under Section 8 of the Fair Housing Act to encourage the adoption and enforcement of fair housing laws in federally funded housing and community development programs. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rent of housing on the basis of race, color, sex, and national origin (the federally protected classes).

The Act was amended in 1988 to include persons with a “handicapping condition,” along with families with children, as protected classes. The legislation adopts the definition of handicapping condition found in Section 504 of the Rehabilitation Act of 1973 as amended. This definition includes any person who has a physical or mental impairment that substantially limits one or more major life activity such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning or working.

The AIFH process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AIFH sources included census data, employment and income information, home mortgage application data, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

The AIFH also incorporates an involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and possible actions to overcome the identified impediments. Additionally, Union County established an Analysis of Impediments Advisory Committee composed of a representative from each municipality currently participating in the County's Community Development Block Grant (CDBG) program.

Union County previously prepared an Analysis of Impediments to Fair Housing Choice in 2017. This analysis focuses on the status and interaction of the previously identified impediments and goals.

## **Background**

HUD enforces the Fair Housing Act of 1968 and 1988 and other federal laws that prohibit discrimination and the intimidation of citizens in their homes, apartment buildings, condominium developments, and in housing transactions, including rental and sale of housing and the provision of mortgage loans. In recognition of equal housing access as a fundamental right, the federal government and the State of North Carolina have each established fair housing as a right protected by law.

## **What are Impediments to Fair Housing?**

As defined by HUD, impediments to fair housing choices are:

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

Impediments to fair housing choices include actions or omissions in the State or Entitlement jurisdiction that:

- Constitute violations, or potential violations, of the Fair Housing Act
- Are counterproductive to fair housing, such as:
  - Community resistance when minorities, persons with disabilities and/or low-income persons first move into White and/or moderate- to high-income areas.
  - Community resistance to the siting of housing facilities for persons with disabilities because of the persons who will occupy the housing.

- Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

## Overview

The purpose of this report is to analyze the facts that may lead to Fair Housing Impediments. It is completed as a requirement of HUD and is intended to serve as a collection of up-to-date conditions that inform the ability to Affirmatively Further Fair Housing in accordance with HUD regulations and guidelines.

The “Background Data” section dives into analyzing all the collected statistics, and grouping them together by different categories, such as population, income, workforce and education, housing, transportation and zoning/land use policies.

- **Population:** A steady growth has been observed (18%) over the last decade with the median age for residents being 39 years of age. Looking through the lens of racial diversity, high percentage (69%) of the population is White (13% Hispanic), with a much lower percent showing as Black, African American (11%) and Asian (4%). More information on population related facts can be found on page 11.
- **Income:** Interestingly, the median household income has increased by 21%, being at \$80,033, while the mean household income is at \$107,967 which shows an increase of 23% from 2015 to 2019. Around 8% of the county residents are still at or below the poverty level, with close to half of those residents being Hispanic. Almost half of the residents currently renting have rent costs that are 35% or more of their total household income. The median rent has increased by 18% from 2015 to 2019, and it is at \$1,030 a month, while median home value increased by 22% and it is currently at \$241,400 within the same time period. More information on income can be found on page 14.
- **Workforce and Education:** Over 90% of the total population graduated from high school or obtained higher education. A little over one third of the total population earned at least a bachelor’s degree or has higher education. Majority of individuals residing in Union County work for private companies, however the most growth in employment was in the private non-profit sector with a 3% increase from 2015 to 2019. Unemployment rate was at 2.7% as of November 2021. The average commute time to work is still around a half hour. More information on workforce and education can be found on page 19.

- **Housing:** Between 2015 and 2020 the population in Union County has increased by 12%, while the total number of households has grown by roughly 8%, and median household income has increased by about 21%. A quarter of the housing stock was built before 1980, and the majority of the housing unit types are single family dwellings. Overall, the Black and Hispanic populations are disproportionately represented to a higher degree in the population of renters and to a lesser degree in the population of homeowners when compared to the general population of Union County. Only around 1.5% of overall housing is publicly supported. More information on housing can be found on page 22.
- **Transportation:** In the last decade, there has been a 10% decrease in public transportation use to get to work. The use of public transit to get to work has fluctuated, but has generally hovered around .4% to .5%. More information on transportation can be found on page 34.

Chapter IV lists the summary of 2017 Impediments on page 36, while the current Fair Housing Impediments can be found on page 51 under Chapter V with actions and recommendations under Chapter VI. The appendices include the supporting quantitative and qualitative data gathered in support of the report.

## INTRODUCTION

The Civil Rights Act of 1968, Title VIII, commonly known as the Fair Housing Act of 1968 states that it is the policy of the United States to provide fair housing throughout the country. This Act prohibits discrimination in the sale or renting of housing, the financing of housing, or in the provision of brokerage services, including or otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, disability, or familial status. In addition, the State of North Carolina Fair Housing Law has been amended to specifically deal with housing affordability.



In accordance with the NC State Fair Housing Act Chapter 41 (hereafter referred to as the State Fair Housing Act) (see [Chapter 41](#)), it is unlawful to discriminate in land-use decisions or in the permitting of development based on race, color, religion, sex, national origin, handicapping condition, familial status, or, except as otherwise provided by law. The purpose of the State Fair Housing Act is to protect a person's right to own, sell, purchase, or rent housing of his or her



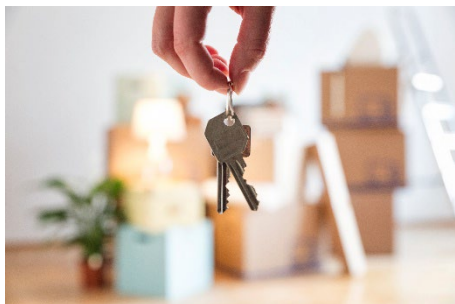
choice without fear of unlawful discrimination. The goal is to allow everyone equal access to housing. In NC zoning and land use development decisions are the purview of local government in accordance with NC Chapter 160 D Local Planning and Development Regulations ([see Chapter 160-D](#)). The State Fair Housing Act and NC Chapter 160 D provide the legal mechanisms for ensuring access to fair housing opportunities within communities.

## **Discrimination in Renting**

The State Fair Housing Act exempts certain types of property, including certain single-family homes rented or sold without the use of an agent and certain owner-occupied buildings containing four or fewer units. The following practices by landlords or their agents (e.g., brokers and property managers) are prohibited:

- Running discriminatory advertisements (for example, ads that state “No Kids”);
- Falsely stating to minority applicants that an available unit has been rented;
- Setting higher or lower rents, security deposit requirements or credit criteria for prospective tenants based on their race or other protected status;
- Failing to respond to inquiries by prospective minority tenants;
- Failing to provide prospective minority tenants with rental applications; and
- Encouraging long-term tenants to leave their apartments by making false allegations regarding the effect of minority residents on property values, an increase in criminal or antisocial behavior, or a decline in the quality of schools or other services or facilities (called “blockbusting”—done so that rents can be increased or so the units can be converted into condominiums or cooperatives and sold).

## **Discrimination in Housing Sales**



It is illegal for a seller or agent to run ads or make statements that are discriminatory. For instance, it would violate the State Fair Housing Act if a seller published a classified ad that characterized the racial makeup of the area the home is in or stated that the house will not be sold to families with children. This part of the State Fair Housing Act applies to ads for single-family and owner-occupied housing even in cases where the property is exempt from other components of the law. In addition, these actions by sellers and their agents are illegal when they disadvantage a protected class:

- Lying about or exaggerating sales terms in order to discourage certain homebuyers or to price them out of the market;
- Failing to inform prospective buyers about all available listings in their price range and desired locations;
- Using stall tactics to avoid showing a home to a buyer;
- Steering prospective buyers only to racially segregated neighborhoods; and
- Refusing to negotiate with interested buyers.

## **Mortgage and Insurance Discrimination**

Some illegal discrimination is obvious, such as the mobile home park owner who says he will not rent to parents of young children, or the real estate agent who refuses to show homes to people of color. But home mortgage and insurance discrimination can be more difficult for individuals to recognize. Mortgage and insurance professionals are prohibited from engaging in certain practices that disadvantage protected classes, including:



- Denying loans or insurance to prospective buyers of homes in certain neighborhoods;
- Scrutinizing the loan application of one applicant more closely than another applicant because of race;
- Giving artificially low appraisals on properties in certain neighborhoods; and
- Imposing different terms or conditions on a loan, such as higher or lower fees, points or rates.

## **Why Assess Fair Housing?**

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(5) of the federal Fair Housing Act, which requires the Secretary of HUD to administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and

Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. The HUD (Affirmatively Furthering Fair Housing (AFFH) certification process requires jurisdictions to do the following:

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

Evaluating fair housing is a complex process involving diverse and wide-ranging considerations. The role of economics, housing markets, and personal choice are important when examining fair housing. Any disproportionate impacts on persons of a particular race, ethnicity, or members of the protected classes under fair housing law have been comparatively analyzed to determine to what extent those disparities are limiting fair housing choice.

## **Methodology**

As a requirement for receiving HUD formula grant funding, Union County is undertaking this Analysis of Impediments to Fair Housing Choice to evaluate impediments to fair housing choice within the County.

The residents of Union County are protected from discrimination in housing choice by the federal Fair Housing Act, which includes protections based on race, color, religion, national origin, sex, disability, and familial status. The residents are further protected by State of North Carolina fair housing ordinances, which extend fair housing protections to the same groups that are enumerated in the federal Fair Housing Act.

Union County, along with Centralina Regional Council (Centralina), conducted this analysis and are responsible for leading the coordination and submission of this document. Staff time and other costs related to the development of this report were funded with program administration funds allocated for fair housing under the Community Development Block Grant (CDBG) funding awarded to Union County.

The purpose of this report is to determine current impediments to fair housing choice in Union County and to suggest actions that the community can consider for overcoming the identified impediments.

The following qualitative research methods were used to gather data and information for this AIFH document:

- **Fair Housing Surveys**
  - Union County Residents in Spanish and English
  - Union County Staff
  - Union County Housing Providers
- **Focus group** made up of local housing-related organizations in Union County
- **Two engagement events**
  - Union County Farmer's Market and Vaccine Clinic
- **Four advisory committee meetings**
  - 7/26/2021
  - 11/10/2021
  - 3/9/2022
  - 4/27/2022
- Educational outreach through two **Fair Housing Trainings** with Legal Aid of NC
  - 2/17/2022
  - 3/9/2022
- **Resources for Landlords - A Networking and Information Sharing Event**
  - 3/9/2020
- Additional research to bolster the **COVID-19 impacted virtual approach**



## Research

The following research represents a list of documents, plans, reports, and data that were reviewed, consulted, accessed, or used to support the results identified in this report.



- Union County's 2017-2021 Analysis of Impediments to Fair Housing Choice
- Several other states' and entitlement communities' Analysis of Impediments to Fair Housing Choice documents, such as housing surveys, including Mecklenburg County, NC, Salisbury, NC, Texas, Arizona, and Virginia
- Financial lending practices under the Home Mortgage Disclosure Act (HMDA) database
- Real estate, mortgage practice and home mortgage foreclosure data 2020 Decennial Census data for population by race data and occupied housing units' data
- [The Affirmatively Furthering Fair Housing Tool \(AFFH-T\)](#) was utilized for remaining housing data and disability data. Note: The AFFH-T data will differ than ACS data because AFFH-T data is built upon each census tract and weighted. These tract values were averaged and then weighted based on distribution of people of different racial and ethnic groups within Union County's CDBG jurisdiction.
- Other data from the 2010 Decennial Census and the American Community Survey's (ACS) 2019 estimates.
- The U.S. Department of Housing and Urban Development's (HUD) Comprehensive Housing Affordability Strategy (CHAS) CHAS Data
- Union County 2050 Comprehensive Plan, Charlotte Regional Transportation Planning Organization's (CRTPO) 2040 Metropolitan Transportation Plan and Union County's Comprehensive Transportation Plan
- Fair Housing Planning Guide (FHP) analysis of HUD complaint data
- The Education Demographic and Geographic Estimates, which pulls American Community Survey Data, for data pertaining to Union County Public School System
- Data pertaining to loan application and denial rates from the Home Mortgage Disclosure Act (HMDA) database
- Housing data from the Consolidated Planning/Comprehensive Housing Affordability Strategy database from HUD

## BACKGROUND DATA

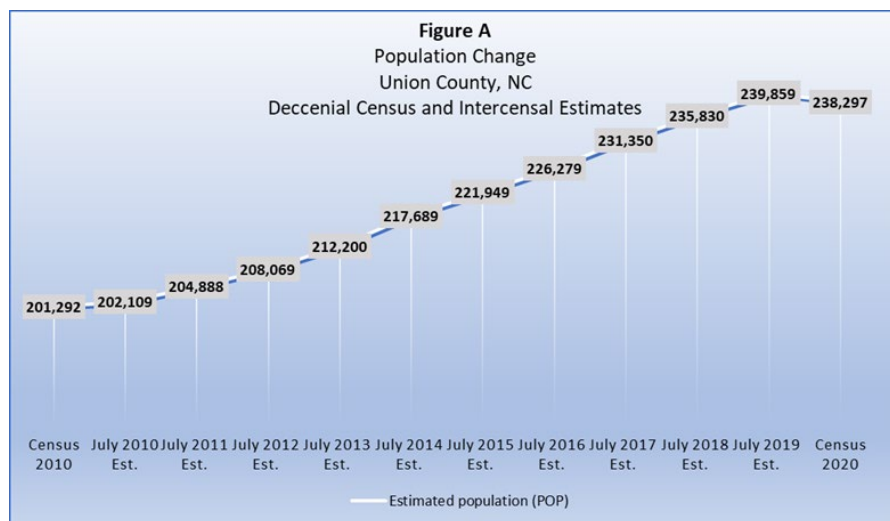
All data is presented in tables or figures and can be located in full in Appendix D at the end of the document. The Table and Figure letter and number identification in this report aligns with the Appendix D numeration system. It is not sequential in the report. This allows the reader to access to the additional topic related data details provided in Appendix D more readily.

## A. POPULATION, RACE AND ETHNICITY

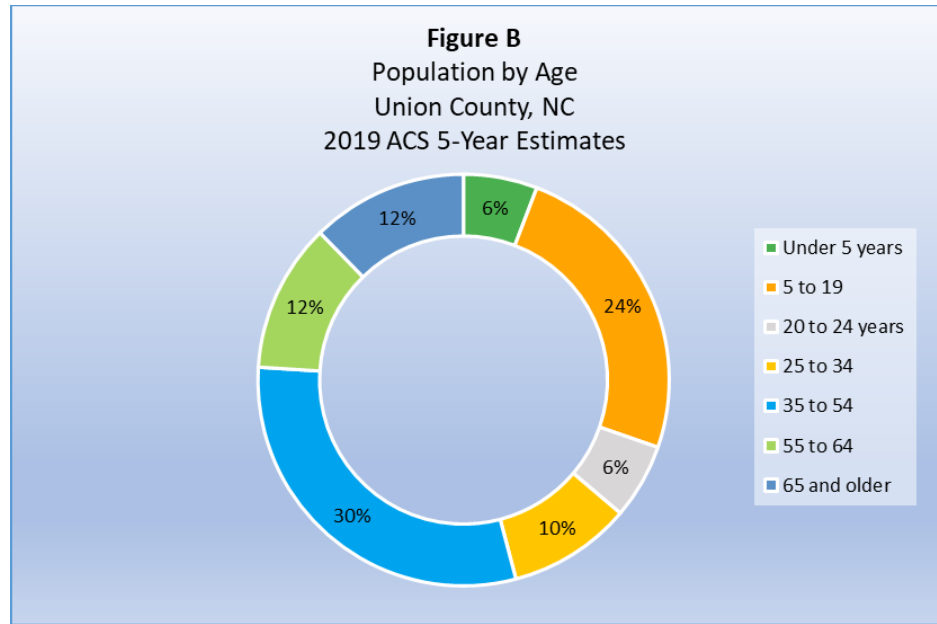
The demographic, housing, economic, and social characteristics of Union County were evaluated as a basis for determining and identifying any existing impediments to fair housing choice. This section presents the background data collected and public input gathered that informs the analysis and findings. A demographic profile of Union County is presented with an emphasis on classes protected under the Fair Housing Act.

2020 Decennial Census data was used for population by race data and occupied housing units' data. The Affirmatively Furthering Fair Housing Tool (AFFH-T) was used for remaining housing data and disability data while all other data has been accessed from the 2010 Decennial Census and the American Community Survey's (ACS) 2019 estimates as it is most recent.

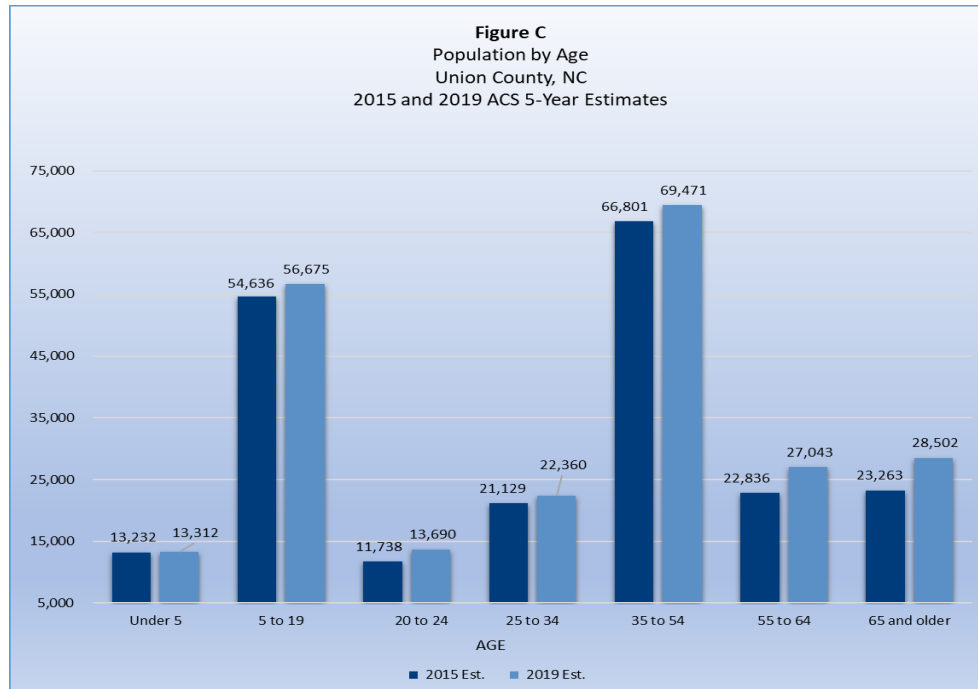
**Population Data.** The U.S Census estimates reflect that Union County experienced moderate growth between 2010 (201,292) and 2020 (238,297), the overall population in Union County is estimated to have increased by 18% over the decade. The population is projected to continue growing in the next three decades by another 60% according to the Union County 2050 Comprehensive Plan.



The graph below shows the age distribution by percentage using the 2019 ACS 5-Year Estimates Data.



**Population by Age Data.** Ages 35 to 54 made up roughly 30% of Union County’s 2019 population estimate, 5-to-19-year-old made up 24% the population, and peoples 55 and older made up 10% of the population, which is the fastest growing age group in the last five years. The median age of Union County residents in 2019 is estimated to be 38.7 years old. This is a slight increase from the median age in 2015, which was 37.2 years old. According to the ACS’s 2019 estimates data, females make up roughly 51% of Union County’s total population while males make up about 49%. The proportion of females to males reversed since 2015 when females made up 48% of the population and males made up roughly 52% of the total population.



**Population by Race and Ethnicity.** According to the 2020 Decennial Census data, 69% of Union County's 2020 population is White and 11% of the population is Black or African American. The County's White population increased by an estimated 4% in the last decade while the Black or African American population increased by roughly 15%. Additionally, the American Indian/Alaska Native population increased from 0% in 2010 to 1% in 2020, a rough 49% increase. The Asian population increased from 2% of the total population in 2010 to 4% of the total population in 2020, a drastic 198% increase. The Native Hawaiian/Pacific Islander population increased by an estimated 94%, though only making up 0% of the total County population in both 2010 and 2020. The percentage of the population that identifies as two or more races has increased from 2% in 2010 to 8% in 2020, a significant increase of 377%. The percentage of the population that identifies as some other race increased from 5% to 7% of the total population between 2010 and 2020, about a 52% increase overall. Respondents who identify as some other race are permitted to list the race they identify as if it is not listed in the Census survey. The Hispanic or Latino population increased by 44% with roughly 13% of the County's population identifying as Hispanic or Latino and an estimated 87% of the County's population identifying as Non-Hispanic or Latino in 2020. 2010 Census data is utilized because 2015 ACS estimates use different variables for populations by race than census data. Thus, the fastest growing populations in the County in terms of race and ethnicity are Asian, Native Hawaiian, two or more races, and Hispanic.



The following table breaks down the racial and ethnic composition of Union County using 2010 and 2020 Census Data.

<b>Figure E</b> Population by Race and Ethnicity Union County, NC 2010 and 2020 Census Data					
Race	2010 Census		2020 Census		% Change '10-'20
	Population	% of Total Population	Population	% of Total	
White, Non-Hispanic	158,954	79%	165,562	69%	4%
Black, Non-Hispanic	23,558	12%	26,981	11%	15%
American Indian and Alaska Native alone	815	0%	1,215	1%	49%
Asian alone	3,217	2%	9,572	4%	198%
Native Hawaiian and Other Pacific Islander alone	63	0%	122	0%	94%
Two or More Races, Non-Hispanic	3,871	2%	18,480	8%	377%
Some Other Race alone	10,760	5%	16,335	7%	52%
<b>Total Population</b>	<b>201,292</b>	<b>100%</b>	<b>238,267</b>	<b>100%</b>	<b>18%</b>
Hispanic or Latino	20,967	10%	30,110	13%	44%
Not Hispanic or Latino	180,325	90%	208,157	87%	15%

## B. INCOME AND POVERTY

Household income is one of several factors used to determine eligibility for a home mortgage loan or rental lease. Additionally, lack of income or living in poverty inherently limits the number of options a household has when choosing where to live. Thus, income and poverty are strongly correlated with housing choice.

**Opportunity Indicators by Race.** According to the AFFH-T's opportunity index, the total Asian or Pacific Islander population received the highest score on the Low Poverty Index, the School Proficiency Index, and the Labor Market Index, while the total Hispanic population received the lowest score for all three categories. The total Asian or Pacific Islander population also received the highest score on the Transit Index, while the total Native American population received the lowest score. The total Hispanic population received the highest score on the Low Transportation Cost Index and the Jobs Proximity Index, while the total Asian or Pacific Islander population received the lowest score in both categories. Lastly, the total Native American population received the highest score on the Environmental Health Index, while the total Asian or Pacific Islander population received the lowest score.

For the population below the federal poverty line, the Native American population received the highest score on the Low Poverty Index, while the Asian or Pacific Islander population below the

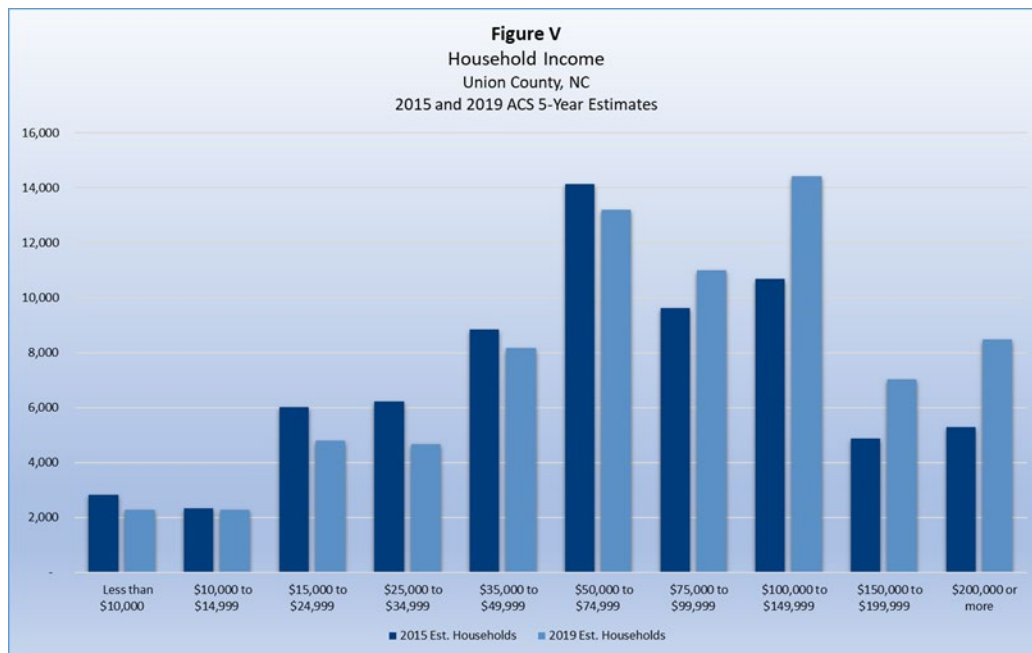
federal poverty line received the lowest score. The White population below the federal poverty line received the highest score for the School Proficiency Index, while the Black population below the federal poverty line received the lowest score. The Native American population below the poverty line received the highest score for the Labor Market Index, while the Black population received the lowest score. The Asian or Pacific Islander population below the federal poverty line received the highest Transit Index score, while the White population below the federal poverty line received the lowest score. The Hispanic population below the federal poverty line received the highest score for the Low Transportation Cost Index, while the Native American population below the poverty line received the lowest scores for both. The Asian or Pacific Islander population below the federal poverty line received the highest score for the Jobs Proximity Index, while the Native American population below the federal poverty line received the lowest score. The Native American population below the federal poverty line received the highest score for the Environmental Index, while the Asian or Pacific Islander population below the federal poverty line received the lowest score.

Considering the total population in Union County, White (Non-Hispanic), Asian and Pacific Islander citizens scored high among the low poverty, school proficiency and labor market opportunity indicators, while Black (Non-Hispanic) and Hispanic citizens scored low.

White (Non-Hispanic), Asians and Pacific Islander individuals scored lower than Black (Non-Hispanic) and Hispanic individuals among the low transportation cost, and job proximity opportunity index.

<b>Figure U</b> Opportunity Indicators by Race and Ethnicity Union County, NC AFFH-T 2020 Data							
	<b>Low Poverty Index</b>	<b>School Proficiency Index</b>	<b>Labor Market Index</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>	<b>Jobs Proximity Index</b>	<b>Environmental Health Index</b>
<b>Total Population</b>							
White, Non-Hispanic	66.38	71.65	60.16	29.53	27.63	28.45	33.00
Black, Non-Hispanic	44.99	60.09	43.86	28.65	33.94	50.29	33.45
Hispanic	40.07	59.32	42.90	29.31	36.13	54.49	32.35
Asian or Pacific Islander, Non-Hispanic	76.47	82.70	72.13	34.82	25.06	28.07	28.58
Native American, Non-Hispanic	59.42	65.14	53.33	28.74	30.84	34.79	34.15
<b>Population below federal poverty line</b>							
White, Non-Hispanic	54.99	62.69	48.78	26.07	31.80	38.10	34.32
Black, Non-Hispanic	38.93	49.40	38.06	27.90	37.28	53.85	34.54
Hispanic	39.50	59.51	43.25	28.25	39.15	59.75	31.17
Asian or Pacific Islander, Non-Hispanic	18.50	50.45	38.82	30.71	35.66	60.33	31.10
Native American, Non-Hispanic	72.16	50.23	56.76	28.95	27.96	24.61	38.78

**Household Income.** Estimates data from both 2015 and 2019 have been adjusted by the U.S. Census Bureau for inflation for each respective calendar year. The distribution of household income in Union County has shifted from most households' income falling between \$10,000 and \$74,000 in 2015 to majority of households' income falling above \$75,000. Household income above \$75,000 has increased the most in the County between 2015 and 2019.



**Poverty Status.** Median Household Income in Union County has increased from \$65,903 in 2015 to \$80,033 in 2019, a rough 21% increase. Mean, or average, household income in Union County also saw significant growth, increasing from \$88,098 to \$107,967 between 2015 and 2019.

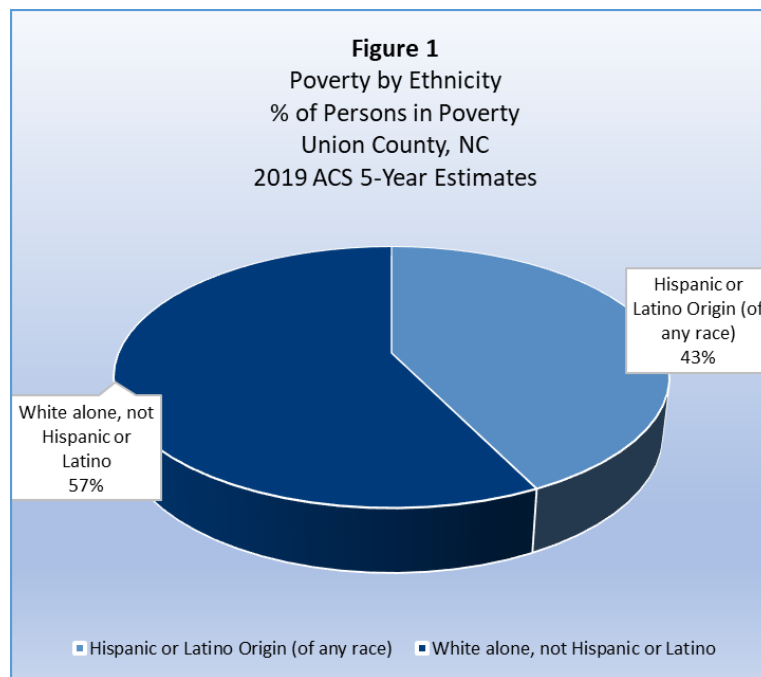
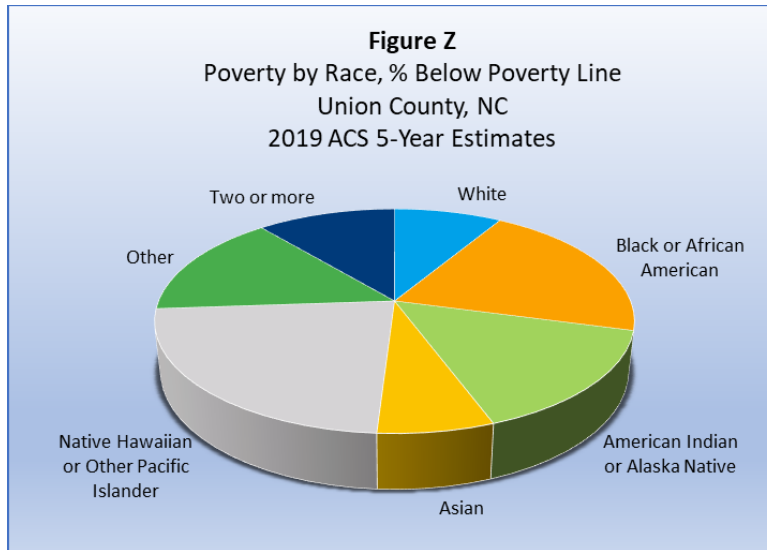
<b>Figure W</b> Household Income Union County, NC 2015 and 2019 5-Year ACS Estimate				
	2015 Est.	2019 Est.	% Change	
Median Household Income	\$ 65,903	\$ 80,033	21%	
Mean Household Income	\$ 88,098	\$ 107,967	23%	

In 2019, the ACS estimates that 18,784, or 8% of Union County residents are at or below poverty status (see Figure Y below), including 11% of people under the age of 18, 8% of people

aged 18 to 64, and 6% of people aged 65 and older (see Figure X below). There is an approximate 12% decrease in population at or below poverty level since 2015 (see figure Y). According to the 2019 ACS estimated, the racial make-up of Union County's impoverished population is made up of 7% White persons, 17 % Black or African American persons, 12% American Indian or Native persons, 19% Native Hawaiian persons, 12% other race, and 9% two or more races. 53% of the impoverished population is White or Non-Hispanic and 43% is Hispanic or Latino (see Figures Z and 1 below). Thus, while there are fewer people in poverty since 2015, there are more children in poverty than compared to other age groups. Additionally, the Native Hawaiian or Other Pacific Islander population is disproportionately impoverished in comparison to the rest of the population.

<b>Figure X</b> Poverty by Age Union County, NC 2015 and 2019 ACS 5-Year Estimates Data					
Age	2015 ACS Estimates		2019 ACS Estimates		% Change
	Persons in Poverty	% of Total	Persons in Poverty	% of Total	
Under 18	8,023	13%	6,839	11%	-15%
18 to 64 years	11,945	9%	10,379	8%	-13%
65 years and over	1,448	6%	1,566	6%	8%

<b>Figure Y</b> Population Below Poverty Level Union County, NC 2015 and 2019 ACS 5-Year Estimates			
	2015 Estimates	2019 Estimates	% Change
Population below poverty level	21,416	18,784	-12%
Percent below poverty level	10.2%	8.2%	-20%



**Gross Rent as Percentage of Household Income.** The 2019 ACS estimates that most households paying rent, 4,757 or 37%, have rent costs that are 35% or more of their household income. This has decreased since 2015. Also, 2,393 have a rent cost that is between 25% and 34.9% of their household income, 3,646 have rent costs that are between 15% and 24.9% of their household income., and 2,039 households have rent costs that are less than 15% of their household income.

<p style="text-align: center;"><b>Figure L</b>  Gross Rent as a Percentage of Household Income  Union County, NC  2015 and 2019 5-Year ACS Estimates Data</p>				
Percentage	2015 ACS Estimates		2019 ACS Estimates	
	Estimate	% of Total	Estimate	% of Total
Less than 15.0 percent	1,551	12%	2,039	16%
15.0 to 19.9 percent	1,823	14%	1,863	15%
20.0 to 24.9 percent	1,642	13%	1,783	14%
25.0 to 29.9 percent	1,326	10%	1,281	10%
30.0 to 34.9 percent	1,563	12%	1,112	9%
35.0 percent or more	4,998	39%	4,757	37%
<b>Occupied Units Paying Rent</b>	<b>12,903</b>	<b>100%</b>	<b>12,835</b>	<b>100%</b>

**Monthly Housing Costs.** The 2019 ACS estimates that roughly 1% of the total 46,054 housing units with a mortgage have a monthly cost less than \$500, 13% between \$500 and \$999 per month, 32% between \$1,000 and \$1,499 per month, 22% between \$1,500 and \$1,999 per month, and 31% more than \$2,000 per month. The median monthly housing cost for housing units with a mortgage increased from \$1,447 to \$1,567, while the median monthly housing cost for housing units without a mortgage increased from \$421 to \$451. For housing units without a mortgage, approximately 39% cost less than \$400 per month and 60% cost \$400 or more per month, a slight increase since 2015. Overall, since 2015, monthly housing costs have increased across Union County. This increase may be due to rising income overall in Union County and thus, more income going to housing costs, but it could also be due to greater demand coupled with lower supply in the local housing market.

Figure J				
Monthly Housing Costs				
Union County, NC				
2015 and 2019 ACS 5-Year Estimates				
Monthly Cost	2015 ACS Estimates		2019 ACS Estimates	
	Units	% of Total	Units	% of Total
Housing Units with a Mortgage				
Less than \$500	715	2%	504	1%
\$500 to \$999	8,350	19%	6,116	13%
\$1,000 to \$1,499	14,154	33%	14,921	32%
\$1,500 to \$1,999	9,061	21%	10,093	22%
\$2,000 or more	11,306	26%	14,420	31%
Total	43,586	100%	46,054	100%
Median (dollars)	\$1,447		\$1,567	
Housing Units without a Mortgage				
Less than \$400	5,864	45%	4,771	39%
\$400 or more	7,046	55%	9,718	61%
Total	12,910	100%	14,489	100%
Median (dollars)	\$421		\$451	

**Median Housing Costs.** The 2019 ACS estimates that the median contract rent has increased by about 19% since 2015, while the median home value increased by roughly 22%.

<b>Figure K</b> Median Housing Costs Union County, NC 2015 and 2019 5-Year Estimates Data		
Housing Cost	2015 ACS Estimates	2019 ACS Estimates
Median Contract Rent	\$868	\$1,030
Median Home Value	\$197,400	\$241,400

**Households w/ Severe Housing Cost Burden.** The AFFH-T estimates that in Union County in 2020, 11% of households were severely cost burdened. Of those severely cost burdened households, 9% are White , 21% are Black , 16% are Hispanic, 22% are Asian or Pacific Islander , 18% are Native American , and 29% are another non-Hispanic race. 9% of households experiencing severe cost burden contain less than 5 people and 6% contain 5 or more people, while 20% are non-family households.

<b>Figure R</b> Households with Severe Housing Cost Burden Union County, NC AFFH-T 2020 Data			
<b>Race/Ethnicity</b>	<b># with severe cost burden</b>	<b># households</b>	<b>% with severe cost burden</b>
White, Non-Hispanic	3,269	37,589	9%
Black, Non-Hispanic	1,342	6,409	21%
Hispanic	648	4,011	16%
Asian or Pacific Islander, Non-Hispanic	175	793	22%
Native American, Non-Hispanic	44	238	18%
Other, Non-Hispanic	110	382	29%
Total	5,588	49,520	11%
<b>Household Type and Size</b>			
Family households, <5 people	3,052	32,273	9%
Family households, 5+ people	436	6,920	6%
Non-family households	2,064	10,303	20%

## C. WORKFORCE AND EDUCATION

According to the United States Census Bureau, educational attainment refers to the highest level of education that an individual has completed. An individual's educational attainment, or access to education, can directly impact their prospects of employment.

**Education Attainment.** It is estimated by the 2019 ACS that in Union County, a total of 66,435 individuals, or roughly 30%, were enrolled in school and 55,183, or 70%, were not. Union County females and males between the ages of 18 to 24 were enrolled in school at similar rates. For the Union County population over 25 years, 88% of males over 25 graduated from high school or higher, while 35% of males over 25 obtained a bachelor's degree or higher. Approximately 91% of females over 25 in the County completed high school or higher and about 36% of females over 25 obtained a bachelor's degree or higher. About 90% of the total population over 25 in Union County completed high school or more while about 35% of the total population obtained a bachelor's degree or more.



<b>Figure 2</b> School Enrollment for the Population 3 Years and Over Union County, NC 2015 and 2019 ACS 5-Year Estimates				
	2015 ACS Estimates	2019 ACS Estimates	% Change	
Enrolled in school	64,425	66,435	3%	
Enrolled in nursery school, preschool	3,902	3,919	0%	
Enrolled in kindergarten	3,320	3,020	-9%	
Enrolled in grade 1 to grade 4	14,656	13,959	-5%	
Enrolled in grade 5 to grade 8	15,571	15,940	2%	
Enrolled in grade 9 to grade 12	15,108	17,394	15%	
Enrolled in college, undergraduate years	9,895	10,375	5%	
Graduate or professional school	1,873	1,828	-2%	
Not enrolled in school	148,997	156,964	5%	
<b>Total</b>	<b>213,422</b>	<b>223,399</b>	<b>5%</b>	

<b>Figure 3</b> Education Attainment by Age and Gender Union County, NC 2019 ACS 5-Year Data						
Education Level	Population 18 to 24					
	Male	% Male	Female	% Female	Total	% of Total
Less than high school graduate	2,175	21%	1,207	12%	3,382	16%
High school graduate (includes equivalency)	4,054	38%	3,378	33%	7,432	36%
Some college or associate's degree	3,575	34%	4,406	43%	7,981	39%
Bachelor's degree or higher	726	7%	1,188	12%	1,914	9%
<b>Total</b>	<b>10,530</b>	<b>100%</b>	<b>10,179</b>	<b>100%</b>	<b>20,709</b>	<b>100%</b>
Education Level	Population 25 Years and Over					
	Male	% Male	Female	% Female	Total	% of Total
Less than 9th grade	3,379	5%	2,301	3%	5,680	4%
9th to 12th grade, no diploma	4,994	7%	4,612	6%	9,606	7%
High school graduate (includes equivalency)	17,902	25%	18,305	24%	36,207	25%
Some college, no degree	14,247	20%	16,481	22%	30,728	21%
Associate's degree	5,710	8%	7,274	10%	12,984	9%
Bachelor's degree	16,757	24%	18,831	25%	35,588	24%
Graduate or professional degree	8,142	11%	8,441	11%	16,583	11%
<b>Total</b>	<b>71,131</b>	<b>100%</b>	<b>76,245</b>	<b>100%</b>	<b>147,376</b>	<b>100%</b>
<b>Percent high school graduate or higher</b>	<b>88%</b>		<b>91%</b>		<b>90%</b>	
<b>Percent bachelor's degree or higher</b>	<b>35%</b>		<b>36%</b>		<b>35%</b>	

**Union County Public School District Demographics.** It is estimated by the NCES that the Union County Schools in 2019 are made up of 79% White students, 11% Black students, 0.2% American Indian and Alaska Native students, 3% Asian students, 0.1% Native Hawaiian and Other Pacific

Islander students, 2% of some other race, and 4% of two or more races. The Asian student population saw the most growth with a 54% increase since 2015. The overall student population grew by 3% between 2015 and 2019.

<b>Figure 14</b> Union County Public School District NCES 2015 and 2019 5-Year Estimates Data					
Race	2015 Estimates	% of Total	2019 Estimates	% of Total	% Change
White	48,995	77%	51,535	79%	5%
Black or African American	7,885	12%	7,260	11%	-8%
American Indian and Alaska Native	150	0%	110	0.2%	-27%
Asian	1,385	2%	2,130	3%	54%
Native Hawaiian and Other Pacific Islander	0	0%	35	0.1%	x
Some other race	2,945	5%	1,495	2%	-49%
Two or more races	2,030	3%	2,775	4%	37%
<b>Total population</b>	<b>63,395</b>	<b>100%</b>	<b>65,340</b>	<b>100%</b>	<b>3%</b>

**Eligible Workers.** The total population of eligible workers is presented by the U.S. Census Bureau as the population over 16, which increased in Union County by 11% between 2015 and 2019. The ACS estimates that the Union County population of peoples 16 years and over in the labor force has increased by 14% between 2015 and 2019. The employment to population ratio in Union County increased from 62.7% to 64.4%, while the labor force participation rate decreased by a little less than 1% between 2015 and 2019.

<b>Figure 15</b> Eligible Workers, 16 years and older Union County, NC 2015 and 2019 ACS 5-Year Estimates			
	2015 ACS Estimates	2019 ACS Estimates	% Change
Civilian employed population 16 years and over	99,712	113,699	14%
Labor Force Participation Rate	68.0%	67.6%	-1%
Employment/Population Ratio	62.7%	64.4%	3%
<b>Total Population over 16</b>	<b>159,021</b>	<b>176,510</b>	<b>11%</b>

**Worker Class by Percent.** The ACS estimates that in 2020 in Union County, approximately 72% of the employed population was made up of private company workers, about 5% was made up of self-employed in own incorporated business workers, approximately 7% was made up of private not-for-profit workers, 10.8% is made up of government employees, and 5.6% is made up of self-employed in own not incorporated business in 2019. The total employed population in Union County rose by 14% between 2015 and 2019 with the private not-for-profit sector seeing the most growth.

<b>Figure 17</b> Worker Class by % Union County, NC 2015 and 2019 ACS Estimates			
	2015 ACS Estimates	2019 ACS Estimates	% Change
Private Company Workers	71.5%	72.0%	0.7%
Self-Employed in Own Incorporated Business Workers	4.8%	4.7%	-2.1%
Private Not-For-Profit Workers	6.7%	6.9%	3.0%
Government Workers	11.3%	10.8%	-4.4%
Self-Employed in Own Not Incorporated Business Workers and Unpaid Family Workers	5.7%	5.6%	-1.8%
<b>Civilian Employed Population over 16</b>	<b>99,712</b>	<b>113,699</b>	<b>14%</b>

**Unemployment Rate.** According to the U.S. Bureau of Labor Statistics, the most current unemployment rate in Union County (November 2021) is 2.7%. The County's unemployment rate in November 2015 was 4.5% and 9.5% in November 2010.

<b>Figure 16</b> Unemployment Rate Union County, NC U.S. Bureau of Labor Statistics FRED Database			
	November '10	November '15	November '21
Unemployment rate	9.4%	4.5%	2.7%

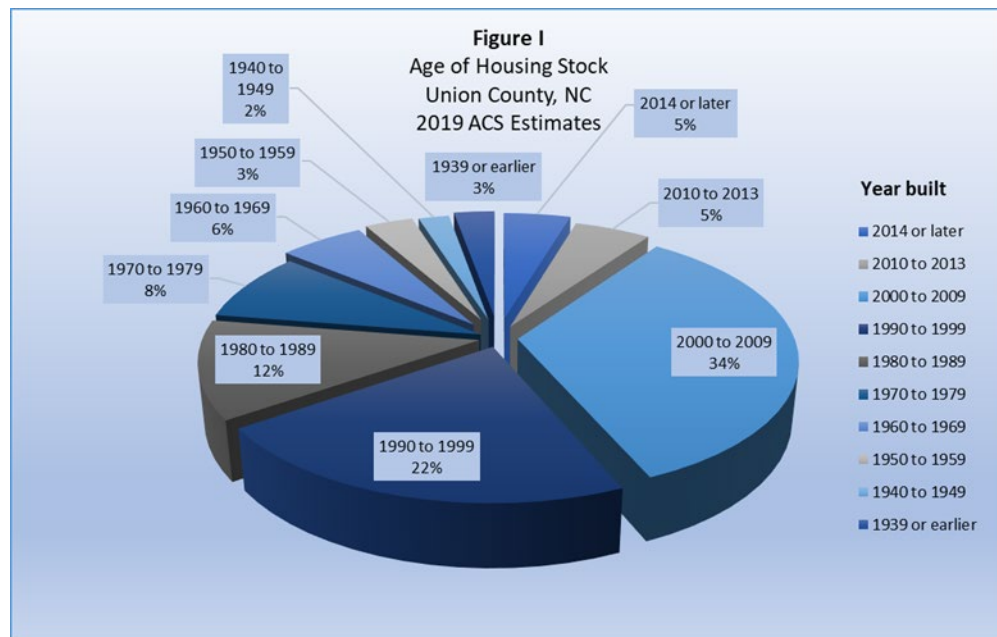
**Mean Travel Time to Work.** The 2019 ACS estimates the mean travel time to work in Union County is 31.0 minutes, while the 2015 ACS estimates the mean travel time to work was 29.3 minutes. There was a 1.7 minute, or 6%, increase since 2015 in mean travel time to work.

## D. HOUSING PROFILE

Housing data provides a comprehensive look into a county or municipality's affordable and fair housing market. The data below dives into the demographics of housing stock, housing cost, public housing, and housing problems.

## HOUSING STOCK AND UNITS

**Age of Housing Stock.** It is estimated by the 2019 ACS that 5% of housing units in Union County were built in 2014 or later, 5% built between 2010 and 2013, 34% built between 2000 and 2009, 22% built between 1990 and 1999, 12% built between 1980 and 1989, 8% built between 1970 and 1979, 6% built between 1960 and 1969, 3% built between 1950 to 1959, 2% built between 1940 and 1949, and 3% built in 1939 or before. Overall the housing stock data indicate, 56% of the homes in Union County were built after 1990, and 5% of homes were built prior to 1940.

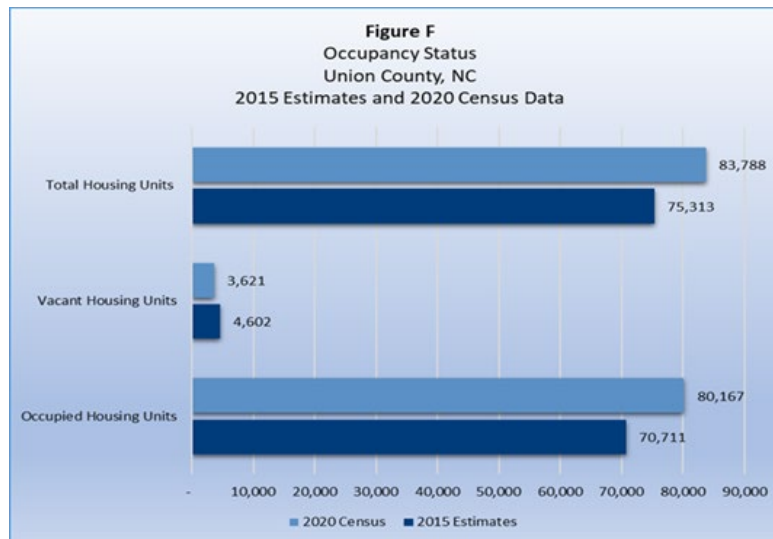


**Housing Units by Type.** The ACS estimates that in 2019, total housing units in Union County were made up of a variety of housing unit types. 87% are detached one unit (single-family dwelling), 3% are attached one unit, 1% are two units, 1% are three or four units, 2% are five to nine units, 1% are ten to nineteen units, .2% are twenty or more units, and 5% are mobile homes.

Large percentage of the Union County's housing stock consists of single family homes, and a very low percentage is made up of two or more housing units.

<b>Figure H</b> Housing Units by Type Union County, NC 2015 and 2019 5-Year ACS Estimates				
Unit Type	2015 ACS Estimates		2019 ACS Estimates	
	Units	% of Total	Units	% of Total
1 unit, detached	65,138	87%	73,212	87%
1 unit, attached	1,475	2%	2,391	3%
2 units	863	1%	818	1%
3 or 4 units	746	1%	681	1%
5 to 9 units	1,347	2%	1,443	2%
10 to 19 units	766	1%	935	1%
20 or more units	474	1%	195	0.2%
Mobile Home	4,433	6%	4,330	5%
Boat, RV, van, etc.	71	0.1%	0	0.0%
<b>Total</b>	<b>75,313</b>	<b>100%</b>	<b>84,005</b>	<b>100%</b>

**Occupancy Status.** According to the 2020 Census, total housing units in Union County increased by 8,475 units between 2015 and 2020. Occupied housing units increased by roughly 13% between 2015 and 2020 while vacant units decreased by roughly 21% in Union County since 2015.



## HOUSEHOLDS

**Growth of Population, Households, and Median Household Income.** Between 2015 and 2019, the ACS estimates that the population in Union County has increased by 12%, while the total number of households has grown by roughly 8%, and median household income has increased by about 21%.

<b>Figure N</b> Growth of Population, Households, & Median Household Income Union County, NC 2015 2019 ACS 5-Year Estimates			
	2015 ACS Estimates	2019 ACS Estimates	% Change
Population	213,422	239,859	12%
Households	70,711	76,346	8%
Median Household Income	\$65,903	\$80,033	21%

**Household Size.** According to the ACS 2019 estimates, 34% of Union County households contain four or more persons in a household, while 17% of households contain three persons, 32% of households contain two persons, and 16% contain one person.

<b>Figure M</b> Households by Household Size Union County, NC 2015 and 2019 5-Year ACS Estimates Data					
Size	2015 ACS Estimates		2019 ACS Estimates		% Change
	Households	% of Total	Households	% of Total	
One Person	11,810	17%	12,322	16%	4%
Two Persons	21,778	31%	24,655	32%	13%
Three Persons	13,435	19%	13,314	17%	-1%
Four-or-more Persons	23,688	34%	26,055	34%	10%
<b>Total</b>	<b>70,711</b>	<b>100%</b>	<b>76,346</b>	<b>100%</b>	<b>8%</b>

**Homeownership and Rental Rates by Race and Ethnicity.** The AFFH-T in Union County estimates that the total number of homeowners in Union County in 2020 are made up of 82% White, non-Hispanic, 10% Black, non-Hispanic, 5% Hispanic, 2% Asian or Pacific Islander, non-Hispanic, .4% Native American, non-Hispanic, and 1% some other race, non-Hispanic. The total number of renters in Union County is made up of 54% White, non-Hispanic renters, 24% Black, non-Hispanic

renters, 19% Hispanic renters, 1% Asian or Pacific Islander, non-Hispanic renters, 1% Native American, non-Hispanic renters, and 1% of some other race, non-Hispanic renters. Overall, Black (Non-Hispanic) and Hispanic individuals are disproportionately represented to a higher degree in the population of renters and to a lesser degree in the population of homeowners when compared to the general population of Union County.

<b>Figure P</b> Homeownership and Rental Rates by Race and Ethnicity Union County, NC AFFH-T 2020 Data				
Race/Ethnicity	Homeowners		Renters	
	#	%	#	%
White, Non-Hispanic	31,670	82%	5,989	54%
Black, Non-Hispanic	3,745	10%	2,685	24%
Hispanic	1,935	5%	2,079	19%
Asian or Pacific Islander, Non-Hispanic	680	2%	120	1%
Native American, Non-Hispanic	155	0.4%	89	1%
Other, Non-Hispanic	253	1%	130	1%
<b>Total Household Units</b>	<b>38,425</b>	-	<b>11,095</b>	-

Note: The AFFH-T data will differ than ACS data because AFFH-T data is weighted.

**Public Housing Units.** The AFFH-T estimates that out of the total 50,694 housing units in the County, 205 are public housing, 232 are Section 8, 11 are another type of multifamily housing unit, and 286 are a part of the County's Housing Choice Voucher program. Overall, less than 1.5% of all housing units in Union County are publicly supported.

<b>Figure G</b> Publicly Supported Housing Units by Program Category Union County, NC AFFH-T 2020 Data		
Housing Units	#	%
Total housing units	50,694	
Public Housing	205	0.40%
Project-based Section 8	232	0.46%
Other Multifamily	11	0.02%
HCV Program	286	0.56%

**Publicly Supported Households by Race and Ethnicity.** The AFFH-T estimates that in Union County for the year 2020, White households occupy 14% of public housing units, 39% of Section 8 housing, and 8% of HCV program housing. Black households occupy 84% of public housing units, 55% occupy Section 8 housing units, and 89% occupy HCV program housing units. Hispanic households occupy 1% of public housing units, 5% of section 8 housing units, and 3% of HCV program units. Asian or Pacific Islander households occupy 0% of all four housing types. There is no data available about the racial and ethnicity make-up of other multifamily housing units in Union County. The total number of households in Union County is made up of 76% of White households, 13% of Black households, 8% of Hispanic households, and 2% of Asian or Pacific Islander households. Out of the total households in Union County in 2020, the AFFH-T estimates that 57% of White households, 27% of Black households, 14% of Hispanic households, and 2% of Asian or Pacific Islander households fall between 0% and 30% of the area median income. 61% of White households, 23% of Black households, 13% of Hispanic households, and 1% of Asian or Pacific Islander households fall between and 0% and 50% of the area median income. Lastly, 66% of White households, 19% of Black households, 12% of Hispanic households, and 1% of Asian or Pacific Islander households fall between 0% and 80% of the area median income in Union County.

<p><b>Figure O</b> Publicly Supported Households by Race and Ethnicity Union County, NC AFFH-T 2020 Data</p>									
(Union County, NC CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander		
Housing Type	#	%	#	%	#	%	#	%	%
Public Housing	29	14%	171	84%	3	1%	0	0%	0%
Project-Based Section 8	87	39%	124	55%	11	5%	0	0%	0%
Other Multifamily	N/a	N/a	0	0%	N/a	N/a	N/a	N/a	N/a
HCV Program	18	8%	196	89%	7	3%	0	0%	0%
<b>Total Households</b>	37,589	76%	6,409	13%	4,011	8%	793	2%	2%
0-30% of AMI	3,051	57%	1,459	27%	723	14%	55	1%	1%
0-50% of AMI	6,422	61%	2,462	23%	1,375	13%	110	1%	1%
0-80% of AMI	13,252	66%	3,823	19%	2,505	12%	219	1%	1%

**Public Housing Unit Size.** In 2020, the AFFH-T estimates that 26% of households in public housing occupy a 0–1-bedroom unit while 32% of households live in a 2-bedroom unit and 42% of households live in a 3+ bedroom unit. Children were living in 59% of households in public housing. 52% of households living in Section 8 housing occupy a 0–1-bedroom unit, 20% of households in a 2-bedroom unit, and 24% of households in a 3+ bedroom unit. Children were living in 34% of households in Section 8 housing units, 3% of households occupying HCV program units are in 0–1-bedroom units, 32% of households are in 2-bedroom units, and 65% of households are in 3+ bedroom units. 58% of households living in HCV program units have children.



<p><b>Figure S</b> Public Housing by Number of Bedrooms and Number of Children Union County, NC AFFH-T 2020 Data</p>								
Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	52	26%	65	32%	86	42%	119	59%
Project-Based Section 8	122	52%	46	20%	56	24%	79	34%
Other Multifamily	0	0%	0	0%	0	0%	N/a	N/a
HCV Program	7	3%	71	32%	143	65%	128	58%

## HOUSING PROBLEM

The most common housing problems are:

- Housing cost burden at 30-50% of income for extremely low-income to low-to-moderate income households that own their homes
- Cost of deferred maintenance for homeowners.
  - Many homeowners have substandard plumbing, electrical, and aging flooring.
  - Most often repairs require an average of \$5,000 to \$10,000 to bring the property up to basic housing standards.
- Length and cost of deferred maintenance for rental properties
  - Due to the lack of affordable rental units throughout the County, many renters must simply deal with the deficiencies.
- Overcrowding for both renters and homeowners

**HUD Comprehensive Housing Affordability Strategy (CHAS).** HUD defines the four housing problems as incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%. HUD defines the four severe housing problems as incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%. Cost burden is the ratio of housing costs to household income. For renter, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is “select monthly owner costs”, which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. A total of 18,830 households (both owner and renter included) out of the total 75,165 households in Union County experienced at least 1 of the 4 housing problems and 8,485 households (both owner and renter included) experienced at least 1 of the

4 severe housing problems. A total of 56,845 households (both owner and renter included) out of the total 75,165 households in Union County experienced cost burden less than or equal to 30%, 10,875 households (both owner and renter included) experienced cost burden between 30% and 50%, and 6,690 households (owner and renter included) experienced cost burden more than 50%.

<b>Figure 18</b> Comprehensive Housing Affordability Strategy Union County, NC 2014-2018 Consolidated Planning/ CHAS Data			
<b>Income Distribution Overview</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household Income <= 30% HAMFI	3,315	3,000	6,315
Household Income >30% to <=50% HAMFI	3,980	2,545	6,525
Household Income >50% to <=80% HAMFI	8,900	3,470	12,370
Household Income >80% to <=100% HAMFI	5,335	1,835	7,170
Household Income >100% HAMFI	38,985	3,795	42,780
<b>Total</b>	<b>60,515</b>	<b>14,650</b>	<b>75,165</b>
<b>Housing Problems Overview 1</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household has at least 1 of 4 Housing Problems	12,170	6,660	18,830
Household has none of 4 Housing Problems OR cost burden not available, no other problems	48,345	7,985	56,330
<b>Total</b>	<b>60,515</b>	<b>14,650</b>	<b>75,165</b>
<b>Severe Housing Problems Overview 2</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household has at least 1 of 4 Severe Housing Problems	5,005	3,480	8,485
Household has none of 4 Severe Housing Problems OR cost burden not available, no other problems	55,510	11,170	66,680
<b>Total</b>	<b>60,515</b>	<b>14,650</b>	<b>75,165</b>
<b>Housing Cost Burden Overview 3</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Cost Burden <=30%	48,530	8,315	56,845
Cost Burden >30% to <=50%	7,260	3,615	10,875
Cost Burden >50%	4,225	2,465	6,690
Cost Burden not available	500	250	750
<b>Total</b>	<b>60,515</b>	<b>14,650</b>	<b>75,165</b>
<b>Income by Housing Problems (Owners and Renters)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available, no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	4,680	1,640	6,315
Household Income >30% to <=50% HAMFI	4,440	2,085	6,525
Household Income >50% to <=80% HAMFI	5,100	7,265	12,370
Household Income >80% to <=100% HAMFI	1,910	5,260	7,170
Household Income >100% HAMFI	2,700	40,075	42,780
<b>Total</b>	<b>18,830</b>	<b>56,330</b>	<b>75,165</b>
<b>Income by Housing Problems (Renters only)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available, no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	2,315	690	3,000
Household Income >30% to <=50% HAMFI	2,080	465	2,545
Household Income >50% to <=80% HAMFI	1,435	2,035	3,470
Household Income >80% to <=100% HAMFI	535	1,300	1,835
Household Income >100% HAMFI	295	3,500	3,795
<b>Total</b>	<b>6,660</b>	<b>7,985</b>	<b>14,650</b>
<b>Income by Housing Problems (Owners only)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available, no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	2,365	950	3,315
Household Income >30% to <=50% HAMFI	2,360	1,620	3,980
Household Income >50% to <=80% HAMFI	3,665	5,230	8,900
Household Income >80% to <=100% HAMFI	1,375	3,960	5,335
Household Income >100% HAMFI	2,405	36,575	38,985
<b>Total</b>	<b>12,170</b>	<b>48,345</b>	<b>60,515</b>
<b>Income by Cost Burden (Owners and Renters)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	4,580	3,390	6,315
Household Income >30% to <=50% HAMFI	4,360	1,765	6,525
Household Income >50% to <=80% HAMFI	4,680	1,025	12,370
Household Income >80% to <=100% HAMFI	1,685	280	7,170
Household Income >100% HAMFI	2,260	230	42,780
<b>Total</b>	<b>17,565</b>	<b>6,690</b>	<b>75,165</b>
<b>Income by Cost Burden (Renters only)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	2,270	1,655	3,000
Household Income >30% to <=50% HAMFI	2,045	625	2,545
Household Income >50% to <=80% HAMFI	1,140	175	3,470
Household Income >80% to <=100% HAMFI	425	10	1,835
Household Income >100% HAMFI	200	0	3,795
<b>Total</b>	<b>6,080</b>	<b>2,465</b>	<b>14,650</b>
<b>Income by Cost Burden (Owners only)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	2,310	1,735	3,315
Household Income >30% to <=50% HAMFI	2,315	1,145	3,980
Household Income >50% to <=80% HAMFI	3,540	845	8,900
Household Income >80% to <=100% HAMFI	1,260	270	5,335
Household Income >100% HAMFI	2,060	230	38,985
<b>Total</b>	<b>11,485</b>	<b>4,225</b>	<b>60,515</b>

**Disproportionate Housing Needs.** The AFFH-T defines “with problems” as households experiencing any of the 4 housing problems and “with severe problems” as households experiencing any of the 4 severe housing problems. Approximately 29% of households in Union County experienced housing problems and 14% experienced severe housing problems in 2020. It is estimated that in Union County in 2020, 23% of White households experienced problems, while 9.77% of White households experienced severe problems. 47% of Black households experienced housing problems with 24% experiencing severe housing problems. 51% of Hispanic households experienced housing problems and 31% experienced severe housing problems. 33% of Asian or Pacific Islander households experienced housing problems and 24% experienced severe housing problems. 23% of Native American households experienced housing problems and 18% experienced severe housing problems. 41% of some other race experienced housing problems and 31% experienced severe housing problems. 24% of family households experiencing housing problems in Union County in 2020 contain less than 5 people and 33% of households experiencing housing problems contain more than 5 people. Roughly 42% of households experiencing housing problems are non-family. The 2019 ACS estimates that approximately .9% of units lack complete plumbing facilities, a significant 262% increase since 2015 (Figure T can be found in Appendix D).

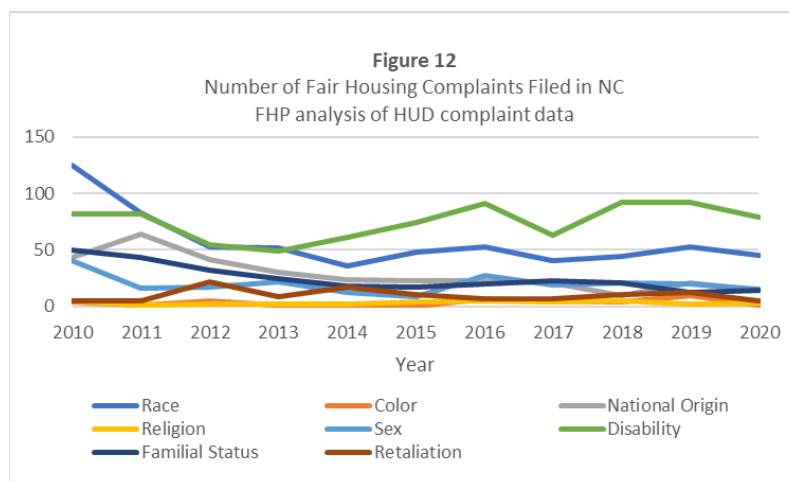
<b>Figure Q</b> Disproportionate Housing Needs Union County, NC AFFH-T 2020 Data			
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
<b>Race/Ethnicity</b>			
White, Non-Hispanic	8,670	37,589	23%
Black, Non-Hispanic	3,039	6,409	47%
Hispanic	2,051	4,011	51%
Asian or Pacific Islander, Non-Hispanic	258	793	33%
Native American, Non-Hispanic	54	238	23%
Other, Non-Hispanic	155	382	41%
<b>Total</b>	<b>14,290</b>	<b>49,520</b>	<b>29%</b>
<b>Household Type and Size</b>			
Family households, <5 people	7,638	32,273	24%
Family households, 5+ people	2,312	6,920	33%
Non-family households	4,304	10,303	42%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
<b>Race/Ethnicity</b>			
White, Non-Hispanic	3,674	37,589	10%
Black, Non-Hispanic	1,545	6,409	24%
Hispanic	1,248	4,011	31%
Asian or Pacific Islander, Non-Hispanic	190	793	24%
Native American, Non-Hispanic	44	238	18%
Other, Non-Hispanic	120	382	31%
<b>Total</b>	<b>6,814</b>	<b>49,520</b>	<b>14%</b>

## E. DISABLED HOUSEHOLDS

A disability is defined in the Fair Housing Act as a physical or mental impairment that substantially limits one or more of a person’s “major life activities.” Major life activities can include caring for oneself, walking, seeing, hearing, speaking, breathing, learning, and working. The definition of disability under the Fair Housing Act also includes people who have a history of an impairment and people who are perceived as having an impairment (even if they are not actually disabled).

Fair housing laws provide persons with disabilities protection from discrimination that they may experience in housing related transactions, which can include renting or buying a housing unit, attaining mortgages, or purchasing insurance. Individuals with disabilities need reasonable modifications to the dwelling unit, which include physical changes such as ramps or grab bars. These modifications are crucial for fair housing opportunities, especially in meeting the growing number of seniors needing accessible housing. Besides modifications, disabled individuals also need reasonable accommodations, which include changes in any rule, policy, procedure or service needed in order for a person with a disability to have fair access to and enjoyment of their home, such as allowing a service animal despite a “no pets” policy.

According to the Fair Housing Project (FHP), A Project of Legal Aid of North Carolina (<https://www.fairhousingnc.org>), most of the housing discrimination complaints filed in NC in the last several years are based on race and disability (Figure 12). Housing discrimination is a reoccurring issue in NC and has been underreported year after year mainly due to lack of education on fair housing rights and enforcement, lack of available resources or because of fear of retaliation by landlords and realtors. Of the 3,753 total number of complaints filed with HUD in the State of North Carolina between 2000 and 2020, there were 1,449 complaints filed based on disability (Source: FHP analysis of HUD complaint data).



**Disability Data by Type, Age, and Public Housing Program Category.** The AFFH-T data estimates that in Union County in 2020, roughly 3% of the total population experience hearing difficulties, 2% experience vision difficulties, 4% experience cognitive difficulties, 5% experience ambulatory difficulties, 2% experience self-care difficulties, and 4% experience independent living difficulties. The AFFH-T estimates that a total of 27,046 people with disabilities reside in Union County, with 1% of individuals aged 5 to 17 having disabilities, about 5% of individuals aged 18 to 64 having disabilities, and 4% of individuals above age 65 having disabilities. It is estimated by the AFFH-T that in 2020, approximately 10% of people residing in Union County public housing have a disability, while about 16% residing in Section 8 housing have a disability, and roughly 12% residing in Housing Choice Voucher (HCV) program housing units have a disability.

<b>Figure 5</b> Disability by Type Union County, NC AFFH-T 2020 Data		
Disability Type	#	%
Hearing difficulty	3,987	3%
Vision difficulty	2,568	2%
Cognitive difficulty	5,196	4%
Ambulatory difficulty	7,232	5%
Self-care difficulty	3,063	2%
Independent living difficulty	5,000	4%

<b>Figure 6</b> Disability by Age Group Union County, NC AFFH-T 2020 Data		
Age of People with Disabilities	#	%
age 5-17 with Disabilities	1,298	1%
age 18-64 with Disabilities	7,230	5%
age 65+ with Disabilities	5,556	4%

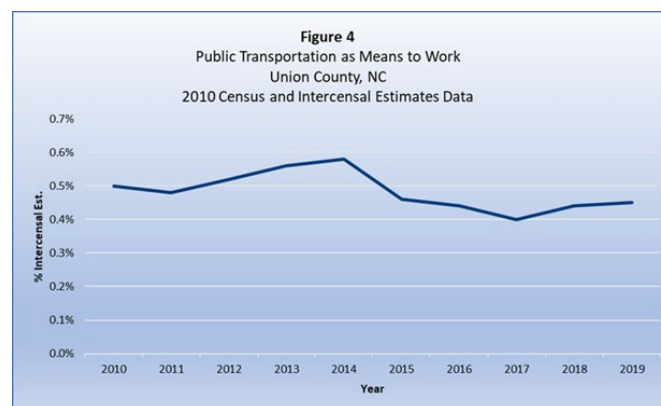
<b>Figure 7</b> Disability by Public Housing Program Category Union County, NC AFFH-T 2020 Data		
	People with a	
	#	%
Public Housing	21	10%
Project-Based Section 8	38	16%
Other Multifamily	N/a	N/a
HCV Program	27	12%

## F. TRANSPORTATION

Access to transportation is one of many factors that can contribute to employment and unemployment rates. Transportation links are also essential elements to successful fair housing. It is a proven method to further Fair Housing by connecting children to good schools, parents to

good jobs, and providing access to grocery stores, pharmacies, doctors' offices, parks and other essential amenities and services. A lack of available transportation resources can be detrimental to residents that do not reside in areas with access to public transportation or a private vehicle.

**Transportation.** Between 2010 and 2019 in Union County, there was a 10% decrease in public transportation use to get to work. The use of public transit to get to work has fluctuated over the decade but has generally hovered around .4% to .5% usage.



The Union County Planning Department oversees the countywide and regional transportation planning by coordinating with the NCDOT and transportation planning organizations and is responsible for site plan review and transportation input into proposed development in the unincorporated portions of the county. The western two-thirds of the county is represented by the Charlotte Regional Transportation Planning Organization (CRTPO), while the eastern third is represented by the Rocky River Rural Planning Organization. The CRTPO is responsible for maintaining a Metropolitan Transportation Plan (MTP) for its area, which addresses transportation related issues and impacts looking ahead 20 years into the future. The organization is currently working on the 2045 Metropolitan Transportation Plan, which is expected to be adopted by the spring of 2022. The Charlotte Region, including Union County, has seen continuous rapid growth in their demographically diverse population, which will require a more robust transportation network to accommodate this change. Residents rely on transportation to access education, health care, and jobs, while city services and employment industries rely on a functioning and efficient system to keep the region's economy moving. The Plan contains a variety of roadway projects intended to increase capacity, enhance connectivity, improve accessibility, and provide reliable travel times. The CRTPO recognizes the increased demand for greenways, transit and walkability, and incorporated recommendations in its 2025 Metropolitan Transportation Plan for the following types of transportation:

- Streets and roads

- Greenway, bicycle, and pedestrian facilities
- Transit routes and fixed rail transportation

The Union County Comprehensive Transportation Plan (CTP) is a long-range plan. The CTP Looks 50+ years into the future and develops recommendations for future improvements for the entire transportation network. It provides the foundation for what will become the transportation priorities over the next 50+ years. It prioritizes four transportation modes: highways and streets; public transportation and rail; bicycle; and pedestrian. It assesses the condition of the entire network and serves as a framework for transportation planning efforts at the local and regional scale.

The Union County 2050 Comprehensive Plan has recently been adopted and recognizes concerns due to the impact of the fast-growing population. The committee members and the public identified traffic congestion, development density, rural character, agri-business, flooding, safe drinking water, and broadband internet access as areas of concern. Addressing the current and potential future issues with Transportation will require Union County to commit funds, which was agreed to by the Coordinating Committee overseeing this plan development. Union County will continue to partner with the North Carolina Department of Transportation to apply and secure transportation grants in the future.

CONNECT Beyond Regional Mobility Initiative is a bold regional transit vision and plan created by Centralina Regional Council and the Metropolitan Transit Commission in October 2021. The CONNECT Beyond initiative provides real mobility solutions and opportunities for residents and visitors across two states and 12 counties. Reliable transportation options provide access to jobs, education, medical facilities, and services, and serve as the foundation to our region's continued economic competitiveness and quality of life. The main regional goals to achieve are:

- Create mobility friendly places
- Expand mobility choices
- Strengthen Rural and Urban Connection
- Build a better bus network
- Invest in strategic mobility corridors

"Mobility means connection. It connects resources. It connects people, young and old, residents and visitors. It connects communities, counties, and cities beyond."



## G. Zoning and Land Use Policies

Zoning and land use related issues, concerns and requests are directed to the Union County Zoning Administrator under the Union County Planning Department, if the property is in any of the unincorporated areas of the County. If the property is in a municipality, each municipality has its own zoning and planning rules and regulations to govern by. The Union County Development Ordinance can be found at <https://www.unioncountync.gov/government/departments-f-p/planning-development/about-planning-zoning-development/zoning>

## REVIEW/UPDATE TO ORIGINAL PLAN

Union County's last Analysis of Impediments to Fair Housing document was completed at the end of 2017.

## SUMMARY OF 2017 IMPEDIMENTS

The previous goals and actions included in the 2017-2021 Assessment of Furthering Fair Housing document are listed below:

#	<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant(s)</u>
1.	Improve access to public infrastructure and transportation services, remove impediments to mobility and increase access to opportunities	The availability, type, frequency, and reliability of public transportation  Inaccessible sidewalks, pedestrian crossings and other infrastructure	Lack of affordable accessible transportation which limits access to opportunities and disproportionately effects persons with disabilities.	Utilize CDBG funds to invest in improvements for sidewalks, pedestrian crossings and infrastructure to ensure ADA compliance. Current and ongoing through the end of	Union County  City of Monroe  Town of Waxhaw

				program year 2020.	
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**Actions Taken:**

The County completed its 2050 Comprehensive Plan, which prioritizes transportation and infrastructure projects for the next 30 years.

The Union County Planning Department is finalizing its 2045 Metropolitan Transportation Plan with the goals and objectives of the Charlotte Regional Transportation Planning Organization's Complete Streets Policy, streets and roads, greenway, bicycle, and pedestrian facilities, transit routes and fixed rail transportation.

Majority of CDBG funds were allocated and spent on streets, sidewalks and infrastructure projects since the last AIFH.

2.	Increase fair housing education, outreach and enforcement	Private discrimination  Lack of resources for fair housing agencies and organizations  Lack of local public fair housing enforcement  Lack of local public fair housing education and outreach	Lack of understanding of federal, state and local fair housing laws.	Union County CDBG staff will coordinate annual fair housing outreach and educational opportunities.  Create a County web page that better educates the public on fair housing rights.	Union County
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**Actions Taken:**

**In progress.**

3.	Preserve affordable housing units for owner-occupied housing for the elderly and	Lack of resources for housing accessibility modifications	Lack of resources to ensure there are enough sustainable existing affordable housing units with	Utilize CDBG funds to annually fund activities that rehabilitate income eligible owner-	Union County  Anson-Union Habitat for Humanity
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	disabled, but making accessibility modifications		accessibility modifications	occupied housing. Create program by 2020 that assists at least 10 homes per year.	
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#### **Actions Taken:**

#### **In progress.**

4.	Preserve existing affordable housing stock to sustain affordable housing choices	Lack of existing affordable owner-occupied units without housing issues	Lack of resources to ensure there are enough sustainable existing affordable housing units that are without housing problems	Utilize CDBG funds to annually fund activities that rehabilitate income eligible owner-occupied housing. Create program by 2020 that assists at least 10 homes per year.	Union County  Anson-Union Habitat for Humanity
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#### **Action Taken:**

#### **In progress.**

The City of Monroe's Fix Program is a housing rehabilitation program for owner-occupied income eligible homeowners within the City's limits. The program provides housing rehabilitation assistance for homeowners regarding code issues, energy efficiency issues, and health and safety issues. Union County has prioritized spending CDBG funds on street improvements and infrastructure projects in the last five years.

## IMPEDIMENTS TO FAIR HOUSING 2022

### A. FAIR HOUSING COMPLAINTS

In the past, Union County residents could submit complaints to the North Carolina Human Relations Commission on the local level. The Commission no longer exists; however, Monroe-Union County Community Development Corporation (A HUD Certified Fair Housing Agency) currently accepts fair housing complaints mainly in the City of Monroe, but also keeps their doors open to county residents with fair housing concerns. Victims of discrimination in housing can also file complaints directly with HUD.

There are agencies that have been supporting or enforcing fair housing activities on the local level within Union County. These agencies are:

- Union County (education and support)
- Monroe-Union County Community Development Corporation (education)
- City of Monroe (education and support)
- Monroe Housing Authority (education and support)

There must be specific enforcement steps followed to carry out Fair Housing Law directives. It is initiated when an individual files a fair housing complaint on a local level. A complaint of discrimination in the housing market can be filed based on race, color, religion, sex, disability, familial status, national origin, elderliness, and retaliation. In Union County, fair housing complaints can be filed with the City of Monroe's Community Development Division or with the Monroe-Union Community Development Corp. The process of filing a complaint starts with an individual filing a complaint with one of the fair housing certified agencies in Union County. Next step is to review and determine correct jurisdiction, and then the complaint is served on each of the respondents mentioned in the complaint. An investigation is then initiated and the Federal Fair Housing and Equal Opportunity Office (FHEO) through HUD interviews relevant parties, reviews documents, and may conduct an onsite visit or refer the complaint to the Fair Housing Assistance Program (FHAP) to do the investigation. After concluding their investigations, FHEO must make a determination of discrimination within 100 days of receiving a complaint or request additional time if needed.

Once HUD and a FHAP receive a complaint, first they attempt conciliation with the parties involved, and a resolution (usually compensation) without officially determining that discrimination took place. If that is not possible, and HUD or the FHAP find basis for complaint of discrimination, the parties can either settle the matter administratively or take the case to federal district court or civil court for litigation. An individual may also bring a fair housing case directly to state or federal court. Cases before HUD Administrative Law Judges are handled by HUD's

Office of General Counsel, and cases in the federal courts are handled by the U.S. Department of Justice.

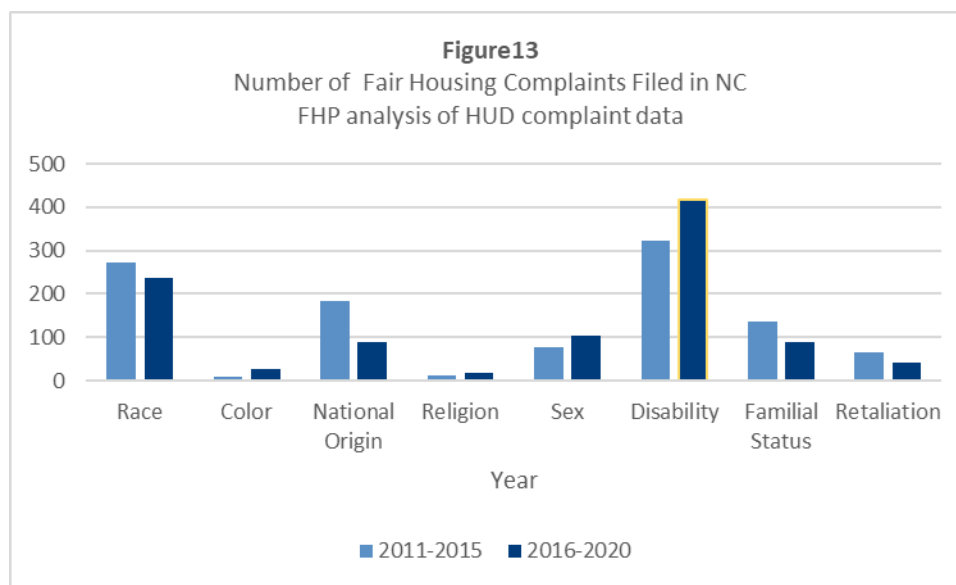
**Number of Fair Housing Complaints Filed in Union County.** According to FHP, in the last 20 years, there were only 29 fair housing complaints filed in Union County that were reported to HUD, Fair Housing and Equal Opportunity Office. Housing discrimination is a very real issue not just across North Carolina but also across the nation. Unfortunately, housing discrimination is immensely underreported and millions of incidences of discrimination occur each year. According to HUD's Greensboro Field Office, there were 10 complaints filed in Union County between 2016 and 2021. The towns, where the fair housing violations took place, were Indian Trail, Waxhaw, Wingate, Matthews and the City of Monroe. Out of the 10 complaints, 3 were based on disability, 6 were based on race and 1 was based on race and familial status. 2 of the cases settled with monetary compensation (1 disability and 1 race), 6 of the cases concluded with no cause determination (2 disability and 3 race and 1 race and familial status). The remaining two cases have not been concluded nor reached settlement yet.

Figure 19  
Filed FH Violation Cases in Union County, NC  
2016 - 2021

Case Number - HUD	HUD/ FHAP	Violation City	Violation County	Violation State	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
N/A	FHAP	Indian Trail	Union	North Carolina	07/25/16	01/20/17	Race	Discrimination in terms and conditions of membership	No cause determination	\$0
N/A	FHAP	Waxhaw	Union	North Carolina	11/22/16	11/22/21	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	\$2,400
N/A	FHAP	Wingate	Union	North Carolina	07/18/17	10/09/18	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
N/A	FHAP	Indian Trail	Union	North Carolina	04/10/18	07/24/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	\$0
N/A	FHAP	Indian Trail	Union	North Carolina	06/20/19	11/10/20	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
N/A	FHAP	Waxhaw	Union	North Carolina	08/01/19	11/15/19	Race, Color	Discriminatory refusal to rent	Conciliation/settlement successful	\$500
N/A	HUD	Monroe	Union	North Carolina	09/06/19		Race	Discriminatory acts under Section 818 (coercion, Etc.); Discriminatory acts under Section 901 (criminal)		\$0
N/A	FHAP	Waxhaw	Union	North Carolina	01/02/20	10/20/20	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
N/A	FHAP	Matthews	Union	North Carolina	06/28/21	09/29/21	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
N/A	FHAP	Waxhaw	Union	North Carolina	09/14/21	08/30/21	Race	Discriminatory terms, conditions, privileges, or services and facilities		\$0

As the result of the Focus Group meeting, Union County learned from community housing related organizations that there are existing rental units that are not safe and adequate to live in, and the necessary repairs are not completed by landlords. These agencies have identified these needs because the tenants voice their complaints to local agencies they are familiar with. These agencies reach out to the landlords to advise them about the current safety issues. In accordance with the HUD Fair Housing Equal Opportunity requirements, Landlords have either 24 hours or

30 days to correct the issue being brought to their attention (depending on the severity). There are agencies that can also issue transfer vouchers to tenants to find another home to move into. Moreover, in accordance with the Code Enforcement Ordinances for Minimum Housing Standards ([see Chapter 153](#)), the City of Monroe is required to ensure that all habitual city dwellings be fit for human habitation as defined by the Minimum Housing Standards. Failure to meet Minimum Housing Codes will result in the Code Enforcement Officer to take remedial action as necessary. Along with the City of Monroe, the Town of Waxhaw ([See the Housing Section](#)) enforced Minimum Housing Codes of the same nature. However, most of the time tenants prefer to stay in their homes, even if the unit is substandard. They either do not want to go through the process of moving, or they are afraid of retaliation. In most instances, major issues are not reported by tenants.



## B. PUBLIC SECTOR

There are 16 low-income housing apartment communities offering 619 affordable apartments for rent in Union County, which are broken down into three categories:

1. Income Based Apartments: 559 apartments. Tenants typically pay no more than 30% of their income towards rent and utilities.
2. Low Rent Apartments: 60 apartments that do not provide direct rental assistance but remain affordable to low-income households in Union County.

3. Housing Choice Vouchers: On average, Section 8 Housing Choice vouchers pay Union County landlords \$700 per month towards rent. The average voucher holder contributes \$400 towards rent in Union County.

### **Housing Choice Voucher Program (HCV formerly known as Section 8)**

The Housing Choice Voucher Program is a federally funded Housing Assistance payment program to assist families in renting affordable housing in the private market.

The participant is free to choose any housing that meets the requirements of the program if the landlord is willing to accept the voucher payment. The HCV program is administered locally by Monroe Housing Authority (MHA). MHA receives federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the program. The Monroe Housing Authority does not own any HCV units. Under the HCV program, once a family is determined eligible, they must follow a process to receive assistance, which includes:

- Attend a briefing and receive a Voucher.
- Locate a property they want to rent.
- Property chosen must pass Housing Quality Standards (HQS) Inspection.
- Rent being charged by the Landlord must be reasonable and qualify within MHA's payment standard.

### **Public Housing**

Public housing was established to provide decent and safe rental housing for eligible low-income families and individuals with a total number of 206 units. MHA has 4 Public Housing communities:

- West Ridge - 33 units (Family Site)
- Serenity Place - 44 units (Elderly and Disabled Site)
- Grace Gardens - 83 units (Family Site)
- Willow Oaks - 46 units (Family Site)

### **Monroe Housing Authority**

Monroe Housing Authority (MHA) was established under the State of North Carolina General Statute 157 (Housing Authority Law) through a cooperation agreement with the City of Monroe, North Carolina on June 28, 1966. MHA administers the Public Housing (PH) and Section 8/Housing

Choice Voucher (HCV) Programs funded through the U.S. Department of Housing and Urban Development for the City of Monroe and Union County.

The Monroe Housing Authority's Resident Opportunities and Self-Sufficiency (ROSS) Program offers supportive services to its Public Housing residents to increase their income, enhance their life goals, or overall become self-sufficient. Through ongoing one-on-one case management, the ROSS Coordinator assists ROSS Program participants in assessing barriers that may hinder self-sufficiency and helping them create goals to achieve success in career advancement, furthering education, or basic life skills.

### **Affordable Housing Need in Union County**

As previously stated, there are 619 public, safe, and affordable rental units available for eligible low-income families and individuals. There was an estimated total of 61,177 families in Union County in 2019, with an approximated 3,354 families living below the poverty level. There are significantly more families living below the poverty level than the 619 safe, affordable rental units available in the County. (Source: ACS 2019 5-Year Estimates)

### **Housing related Social Service Agencies**

<b>Agency Name</b>	<b>Description of Services Provided</b>
The Arc of Union County	Non-profit organization that supports and empowers people with intellectual and developmental disabilities and their families.
Community Link	Non-profit organization with the mission to enable individuals and families to obtain and sustain safe, affordable, and decent housing.
Monroe Housing Authority	Providing quality and affordable housing to the residents of Monroe and Union County in North Carolina.
InReach	Non-Profit organization that provides a wide variety of services to individuals with intellectual and developmental disabilities.
Monroe-Union County Community Development Corporation	HUD-certified Housing Counseling organization with the mission to assist low- and moderate-income families in improving



	quality of life, obtaining affordable housing, developing small businesses as well as strengthening economic development through education, services, and training.
United Way of the Central Carolinas	Non-profit organization focusing on education, health, financial stability, and basic needs.
Union County Community Action	Providing comprehensive services to promote self-sufficiency for children, youth, adults, and families across Union County.
United Diversified Industries	Non-profit organization enhancing the quality of life of adults with developmental disabilities by providing habilitation services, enrichment services, and vocational training.
Community Shelter of Union County	Non-profit organization providing food, shelter, and services for the hungry and homeless population of Union County.
The City of Monroe	Providing down payment assistance to low-to-moderate income households for homeownership opportunities. Additionally, the City partners with Habitat for Humanity, Council on Aging, and other private public partners in the urgent repair and rehabilitation of income qualified homeowner occupied residential dwellings, included ADA accessibility.
Council on Aging	Local non-profit organization providing services, support, and advocating for people 60 and over in their efforts to remain healthy, active, and in control of their own lives.
Union-Anson Habitat for Humanity	Non-profit organization with the mission to provide decent affordable housing to lower-income families. Habitat has grown to now build 8-12 houses per year.

## C. PRIVATE SECTOR

### Real Estate Industry

The Union County Association of Realtors, Inc. was established in 1970, as a professional trade association representing the real estate industry in Union and Anson counties.

As a requirement for membership in the National Association of Realtors (NAR), all members (new members and existing members, as well as a paid continuing education option) must complete a mandatory ethics training and abide by the National Association of Realtor's Code of Ethics. Article 10 of the NAR Code of Ethics states that Realtors "shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. Realtors shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, or gender identity. "

<https://www.nar.realtor/search-results?qu=ethics%20training>

### **Private Financing**

The Fair Housing Acts prohibits private lenders to discriminate against individuals based on their race, color, national origin, religion, sex, familial status, or disability.

There are two federal laws that can protect against discrimination: the Equal Credit Opportunity Act (ECOA), which deals with regularly extending credit through applying for small loans, or credit cards, refinancing etc. and the Fair Housing Act (FHA), which deals with all aspects of residential real estate transactions. If a loan application is denied by a creditor, according to the law, they must provide a reason why in writing. They must also provide contact information for the agency that can be contacted by the borrower in case of an issue or concern.

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. It was later transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides the public loan data that can be used to assist:

- in determining whether financial institutions are serving the housing needs of their communities;
- public officials in distributing public-sector investments to attract private investment to areas where it is needed; and
- in identifying possible discriminatory lending patterns

**Home Loan Activity.** -The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage

Disclosure Act (HMDA). The annual HMDA data can be found online at [www.ffiec.gov/hmda](http://www.ffiec.gov/hmda). According to HMDA data estimates, between 2018 and 2020 a total of 22,146 loans were applied for in Union County in 2019, a 104% increase in applications since 2018. The loan purposes were home improvement, home purchase, and refinancing.

<b>Figure 8</b> Purpose of Loan by Year Union County, NC 2018 to 2020 HMDA Data				
<b>Purpose of Loan</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>% Change</b>
Home Improvement	1,168	1,306	1,131	-3%
Home Purchase	7,448	8,162	8,256	11%
Refinancing	2,231	4,539	12,759	472%
<b>Total</b>	<b>10,847</b>	<b>14,007</b>	<b>22,146</b>	<b>104%</b>

**Loan Application by Denial Reason.** The HMDA estimates that in Union County in 2019, approximately 2,907 of those 22,146 loan applications were denied. A majority of the denial reasons are due to debt-to-income ratio or credit history. Since 2018, the most frequent denial reason is credit history. There has been a roughly 23% increase in loan denials from 2018 to 2020.

<b>Figure 9</b> Loan Application by Denial Reason Union County, NC 2018 to 2020 HMDA Data				
<b>Denial Reason</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>Total</b>
Debt-to-Income Ratio	686	764	764	<b>2214</b>
Employment History	13	30	46	<b>89</b>
Credit History	808	839	791	<b>2438</b>
Collateral	320	357	313	<b>990</b>
Insufficient Cash	60	66	70	<b>196</b>
Unverifiable Information	79	107	137	<b>323</b>
Credit Application Incomplete	230	272	519	<b>1021</b>
Mortgage Insurance Denied	1	0	0	<b>1</b>
Other	162	194	267	<b>623</b>
<b>Total</b>	<b>2359</b>	<b>2629</b>	<b>2907</b>	

**Loan Denial Rates by Race and Gender.** HMDA data shows that White individuals in Union County are denied loans at the highest rate with denial rates for Black individuals falling in second

and Asian individuals being third. Males and females in Union County are denied loans at a similar rate, according to HDMA data. Joint applications are denied at the highest rate.

**Figure 10**  
Loan Denial Rates by Race and Reason of Denial  
Union County, NC  
2020 HMDA Data

Race	Collateral	Credit App Incomplete	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash	Other	Unverified Info	Total
American Indian or Alaska Native	0	1	3	0	1	0	1	1	7
Asian	11	26	23	41	5	5	15	11	137
Black	26	36	113	90	0	11	21	12	309
2 or more minority races	0	0	1	2	0	0	1	1	5
White	221	323	509	466	30	42	182	90	1863
Native Hawaiian or Other Pacific Islander	2	0	2	2	0	0	2	0	8
Not Available	50	126	125	154	10	540	41	22	1068

**Figure 11**  
Denial Rates by Gender of Applicant  
Union County, NC  
2018 to 2020 HDMA Data

Year	Male			Female			Joint			Not Available		
	Denied	Total	% of total	Denied	Total	% of total	Denied	Total	% of total	Denied	Total	% of total
2018	920	4,848	39%	482	2,505	20%	731	5,242	14%	227	2,350	10%
2019	558	6,275	39%	558	3,089	21%	814	6,660	12%	231	2,748	9%
2020	1,071	9,321	37%	552	4,180	19%	977	10,186	10%	312	4,191	11%
<b>% Change of Denied</b>	<b>16%</b>			<b>15%</b>			<b>34%</b>			<b>37%</b>		

## D. CITIZEN PARTICIPATION

An important component of the background research for an Analysis of Impediments to Fair Housing Choice includes input regarding fair and affordable housing conditions, perceptions, and needs in Union County. The County employed several approaches to achieve meaningful public engagement with residents and other stakeholders, including focus groups, public meetings, and a community-wide survey.

## ADVISORY COMMITTEE

The Advisory Committee was created by requesting each CDBG participating municipality in Union County to provide a representative for their jurisdiction to serve on the Advisory Committee. The role of the representatives was to identify key stakeholders and support public engagement efforts, review previous impediments and the proposed 2022 impediments, review

the proposed action plan and provide feedback, and collaborate with Union County to implement the approved action plan.

Advisory Committee Members:

- Union County
- Town of Stalling
- Town of Fairview
- Village of Wesley Chapel
- Mineral Springs
- City of Monroe

Advisory Committee Meeting #1 Attendance

July 26<sup>th</sup>, 2021

Savannah Cooper (host/facilitator), Patricia Kindley, Clayton Voignier, Karen Wingo, Brad Sellers, Rick Becker, Teresa Campo, Erinn Nichols, Brandi Deese, Cheryl Bennet

Advisory Committee Meeting #2 Attendance

November 10<sup>th</sup>, 2021

Christina Danis (host/facilitator), Clayton Voignier, Zsuzsi Kadar, Kate Fersinger, Erinn Nichols, Patricia Kindley, Cheryl Bennet, Rick Becker, Teresa Campo

Advisory Committee Meeting #3 Attendance

March 9<sup>th</sup>, 2022

Zsuzsi Kadar (host/facilitator), Christina Danis, Clayton Voignier, Kate Fersinger, Cheryl Bennet, Rick Becker, Teresa Campo

Lauren Brasil from the Fair Housing Project of Legal Aid North Carolina was in attendance and presented information regarding the North Carolina Fair Housing Act and its relation to the Analysis of Impediments Report and the Affirmatively Furthering Fair Housing rule.

Advisory Committee Meeting #4 Attendance

April 27<sup>th</sup>, 2022

## **COMMUNITY ENGAGEMENT EVENTS**

Three community engagement events were completed to inform the Analysis of Impediments to Fair Housing. The first event occurred during Union County's Vaccine Clinic at the Human Services Building on October 21<sup>st</sup>, 2021, from 2 p.m. to 4 p.m. Informational materials (see Appendix III) and Union County Fair Housing Surveys were distributed to be returned and completed. Engagement materials and Union County Fair Housing Surveys were distributed ongoing until the survey closed on December 3<sup>rd</sup>, 2021 at Vaccine Clinics, which occurred on Tuesdays and Thursdays from 2 p.m. to 4 p.m. Approximately thirty (30) individuals received materials and returned completed surveys.

The second community engagement event occurred on November 6<sup>th</sup> from 9 a.m. to 12 p.m. at the Union County Farmer's Market. The same engagement materials and Union County Fair Housing Surveys were distributed. Approximately fifteen (15) individuals received materials and surveys, though only two surveys were completed and returned.

The last community engagement event occurred virtually on February 17<sup>th</sup> from 2:00 p.m. to 3:00 p.m. with the Fair Housing Project of Legal Aid North Carolina. The Fair Housing Project of Legal Aid NC works to eliminate housing discrimination and to ensure equal housing opportunity for all people in North Carolina through education, outreach, public policy initiatives, advocacy, and enforcement. Jack Holtzman, the co-director of the Fair Housing Project, led a presentation of fair housing policies and best practices, followed by Q&A and discussion. The event was called the CDBG Fair Housing Information Session and was available to the public, being advertised in the Union County Newsletter and on their website leading up to the event.

## **FOCUS GROUP AND STAKEHOLDER INTERVIEWS**

The first focus group, made up of identified nonprofit stakeholders in Union County, was held virtually on October 28<sup>th</sup> from 2:00 p.m. to 3:30 p.m. Eleven (11) individuals attended the focus group with four (4) representing local housing agencies, four (4) representing nonprofits who serve individuals with disabilities, and one (1) international nonprofit network.

### **Focus Group Members:**

- The Arc of Union County
- Community Link

- Monroe Housing Authority
- InReach
- Monroe-Union County Community Development Corporation
- Union County Community Action
- United Diversified Industries
- Community Shelter of Union County
- United Way of the Central Carolinas

During the focus group, the 2017 Analysis of Impediments (AI) Report identified impediments and the County's action items were discussed, as well as additional impediments that have arose since the last AI was completed. The discussion consisted of identifying land constraints, a lack of education surrounding affordable housing, drastic rent and housing price increases, poor quality of rental units, and lack of accessible public transportation. Additionally, the group discussed courses of action Union County should take to ensure access to affordable housing and to address supply-chain shortages and construction costs. Some suggestions to ensure access to affordable housing include issuing a cap on rent, allotting existing units to become affordable housing units, developing a Land Use Plan to allocate funds towards building affordable housing units, building affordable housing in accessible areas, stimulating tax credits and multifamily developments across the County, implementing a down payment assistance program, developing county-wide training relating to fair housing and fair-housing rights, thinking innovatively and making sacrifices to ensure accessible affordable housing, funding a Tax Credit Program for households earning 30% or less of AMI, and pooling resources from every aspect of the County (including the larger community). To make a decision on which of these recommendations are the most reasonable for possible implementation, the creation of a county-wide Fair Housing Council is recommended. The Council would take a closer look at each of these recommendations, and after further research, they would present the findings to the Board of County Commissioners for consideration.

Additionally, the County identified private housing developers and builders to create a second focus group. A survey was sent to the identified individuals and the findings are as follows:

#### **COMMUNITY SURVEY AND UNION COUNTY STAFF SURVEY**

Union County used a comprehensive data analysis to identify the current Impediments to Fair Housing. The Community and Union County Staff Surveys were methods used during the AI process to receive data and information directly from residents regarding affordable housing in

the County. The survey examples and data analysis of the responses are presented in greater detail in Appendix B and summarized below.

### **Union County Fair Housing Community Survey**

The Union County Fair Housing Community Survey was spread widely among Union County residents and received 895 responses, 96% of those respondents reside in Union County. The survey respondents reflect 9% between the ages of 18 and 34, and 71% between the ages of 35 and 64, and 20% were aged 65 and older. The respondents represent 76% of individuals who identify as white, 14% identify as Black, 3% identify as Asian or Asian American, and 7% identify as other races. The respondents included 7% Hispanic, Latino, or Spanish Origin individuals. The nature of the survey respondents generally reflects the overall demographics of Union County. However, despite offering the survey in Spanish and conducting in-person survey outreach the Hispanic, Latino, or Spanish Origin percentage for survey respondents is underrepresented.

The individuals who responded to the survey identified impediments to fair housing as high rent, home, and utility prices, lack of education and assistance in finding affordable and senior housing, lack of available affordable housing, poor quality of existing affordable housing stock, lack of accessible public transit and sidewalk infrastructure, discrimination based on race, religion, gender, etc., and rapid population growth in the County.

Additionally, respondents identified action steps they believe the County should take in response to the fair housing crisis. These action steps include slowing down development, incentivizing developers to build more affordable housing, building accessible affordable housing for senior citizens, increasing overall quality of existing affordable housing stock, improving public transit and infrastructure in an inclusive lens, creating policies that limit maximum rent and home costs, offering educational programs regarding fair housing, creating a database of affordable housing offered in the County, increasing outreach to minority communities regarding fair housing rights, offering assistance to first time home buyers, and dedicating efforts to working with the community to increase affordable housing stock across the County.

### **Union County Fair Housing Staff Survey**

Staff respondents were also given the opportunity to write-in impediments they believe are barriers to fair and affordable housing, and they identified rapid population growth in Union County, overdevelopment, poor quality in existing affordable housing, and the increase in rent and housing prices. Additionally, respondents listed housing providers or stakeholders that Union County should engage during the AI process, which helped inform the creation of the focus



groups. Moreover, respondents listed any state/local plans or additional data sources that they believe Union County should review as part of the AI.

For a full breakdown of all survey responses, please see Appendix B.

## PUBLIC HEARINGS



According to Union County's 2021-2025 Citizen Participation Plan, the County must conduct at least two (2) public hearings per year to obtain the views and comments of residents, service providers, government agencies, and other stakeholders regarding the County's CDBG funded programs. The public hearings generally address housing and community development needs, development of proposed activities, and the review of

program performance.

Additional public hearings are held as deemed necessary by Union County in order to inform residents of community development project(s) and activities, and to solicit resident opinions and comments. As a result of the public hearing conducted on Monday, April 18, 2022 at 2:00 pm virtually and in person, there were no comments received from any public/private entities, nor from Union County residents.

## ACTIONS AND RECOMMENDATIONS

### E. 2022 IMPEDIMENTS TO FAIR HOUSING CHOICE

The following impediments to fair housing choices are presented to assist Union County to affirmatively further fair housing in the community. Below is the list of impediments that were developed as part of Union County's 2022 Analysis of Impediments to Fair Housing Choice.



**Impediment 1 - Formalized structure and enforcement** for a local fair housing system.

- More resources need to be available to assist victims of discrimination
- Emphasis on enforcement of affirmative marketing of affordable housing
- Emphasis on enforcement of the rules of affordable housing

**Impediment 2 - Education and knowledge** on federal, state, and local fair housing laws in English, Spanish or other preferred languages.

- Additional fair housing educational opportunities for renters and homebuyers
- Additional educational sessions on fair housing laws for housing providers and landlords
- Additional education on fair housing rights and enforcement procedures to local housing related organizations

**Impediment 3 - Insufficient supply of new affordable housing** to meet the growing needs of low- and moderate-income residents.

- Lack of partnerships and support between public and private partners to efficiently leverage resources to build affordable housing or create mixed-income communities.

**Impediment 4 - Public resources to be allocated for preservation and accessibility modification** of existing housing stock for both the elderly and disabled homeowners.

- More public funds could be used to leverage housing rehabilitation related expenses through housing repair programs throughout Union County.

**Impediment 5 - Access to public transportation** affecting housing choice for low-to-moderate income, and special needs populations.

- Inadequate public transportation options that match appropriately priced housing options in specific communities.

Union County, NC	
2022 Impediments to Fair Housing	Current and New Goals
1. Formalized structure and enforcement	New

2. Education and knowledge of Fair Housing laws	Current
3. Access and supply of affordable housing	Current
4. Preservation/modification of existing housing stock	Current
5. Access to public transportation	Current

#### F. ACTIVITIES AND RECOMMENDATIONS TO AFFIRMATIVELY FURTHER FAIR HOUSING

The fair housing action plan detailed below provides recommended goals and activities for Union County to consider implementing over the next five years to affirmatively further fair housing choice for Union County residents. The action plan builds on the work of current programs and working groups. It employs a combination of education, data collection and development of partnerships with increased access to affordable housing and housing services. The fair housing action plan requires comprehensive regular updates, monitoring of metrics and resources to meet the fair housing goals and objectives established by Union County.

<b>#</b>	<b><u>Goal</u></b>	<b><u>Contributing Factors</u></b>	<b><u>Fair Housing Issues</u></b>	<b><u>Metrics, Milestones, and Timeframe for Achievement</u></b>	<b><u>Responsible Program Participant(s)</u></b>
1	Increase fair housing resources and enforcement.	Lack of fair housing marketing and rules enforcement.	Lack of understanding the results of enforcement of rules.	Create a Fair Housing Advisory Committee.  Increase number of county-wide FH trainings (minimum 3 per year).  Examination and suggested updates to existing Code Enforcement Ordinances	City of Monroe  Existing municipalities within Union County

				within Union County.	
<b>Discussion:</b> The goal is to increase the knowledge about Fair Housing laws and regulations among county residents, landlords, tenants, local agencies, organizations, and municipalities, and encourage updating existing Code Enforcement Ordinances to provide a baseline for effective enforcement strategies, that can be implemented.					
2	Increase fair housing education and outreach.	Private and public discrimination.  Lack of resources for renters, homebuyers, landlords and housing developers.  Lack of local public fair housing education and outreach.	Lack of understanding of federal, state, and local fair housing laws.	Union County will organize local fair housing events and trainings sessions (minimum 3 sessions per year)  Create a Fair Housing Advisory Committee.  Create a virtual platform as a one stop shop for housing tools and resources for both residents and service providers.	Union County  City of Monroe
<b>Discussion:</b> Union County will be partnering up with the NC Justice Center to organize county-wide training sessions on fair housing issues at least three times a year, subject to HUD funding availability. Partnering up with local housing agencies to educate tenants and landlords on fair housing rights.					
3	Increase supply of new affordable housing units	Lack of sufficient supply of new affordable housing	Lack of partnerships and support between public and private partners to efficiently leverage resources necessary to build affordable housing or create mixed-income communities.	Initiating conversation with Affordable Housing Developers.  Implement a county-wide Septic Tank Repair program using CDBG funds with a plan of expanding it into a Critical Home	Union County  City of Monroe

				Repair program in the future.	
<b>Discussion:</b> Union County is lacking in the development of new affordable housing. The County will begin by initiating partnerships with public and private housing developers and advocating for the development affordable and mixed-income housing.					
4	<b>Increase preservation and accessibility modification of existing affordable housing stock</b>	<b>Lack of existing affordable and accessible owner-occupied housing</b>	<b>Not enough resources to maintain and improve affordable housing units that do not meet the local code compliance.</b>	<b>Utilize HUD funds and seek out additional funding sources to improve existing owner-occupied housing units.</b>	<b>Union County</b>  <b>Anson-Union Habitat for Humanity.</b>  <b>City of Monroe</b>
<b>Discussion:</b> Union County is looking into starting a septic tank repair program with a goal of assisting 10-15 homes in the county as a way of maintaining affordable housing units in the community. The goal is to work towards building up a county-wide robust critical home repair program, using CDBG funds, and other available grant funds over the upcoming years. The County also plans on actively seeking out potential partnerships with existing local Community Housing Development Organizations to partner up with.					
5	<b>Provide better access to mobility and transportation services.</b>  <b>Continue improving access to public infrastructure.</b>	<b>Lack of complex public transportation system that connects communities in a way that would allow less dependability on automobile usage.</b>	<b>Lack of reliable public transportation system can isolate communities from needed resources.</b>	<b>The County will continue working with the State of North Carolina and regional and local transportation organizations to overcome transportation related barriers.</b>	<b>City of Monroe</b>  <b>Centralina Regional Council</b>  <b>North Carolina Department of Transportation (NCDOT)</b>
<b>Discussion:</b> Union County will continue being involved in discussions about local and regional public transportation initiatives.					

## G. FAIR HOUSING BEST PRACTICES

According to the Final Rule on AFFH issued by HUD in 2015, AFFH is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” (80 FR 42353).

Providing affordable housing options and/or creating socioeconomically integrated communities are very complex tasks to work towards and achieve. In neighborhoods with pockets of racial and ethnic poverty the affordable housing stock is made up of mostly older units, that are more likely to be substandard and the costs of improvements are usually beyond the homeowners’ means. There is usually lack of transportation between affordable housing and available jobs along with lack of services in these areas. Local governments face the options of either looking into ways of transforming racially or ethnically concentrated areas of poverty into resource-rich areas or trying to create integrated mixed-income communities mainly through inclusionary zoning.

### **Policy Related Concepts**

**“Inclusionary housing programs** are local policies that tap the economic gains from rising real estate values to create affordable housing for lower income families. An inclusionary housing program might require developers to sell or rent 10 to 30 percent of new residential units to lower-income residents.” ([www.inclusionaryhousing.org](http://www.inclusionaryhousing.org)). Inclusionary zoning (IZ) can be implemented in the form of a program, regulation, or law that requires or provides incentives to private developers to incorporate affordable housing as part of market driven developments in the form of tax abatements, density bonuses that allow them to build more units than would otherwise be allowed, expedited permitting and/or reduced permitting fees for zoning permits for their projects, greater height allowances, reduced parking requirements, and exemptions from other regulatory requirements.

Many jurisdictions and communities are continuously exploring and incorporating inclusionary zoning in their zoning ordinances to help rebalance high level of poverty by trying to create mixed-income communities that provide better access to job opportunities, a safe environment, and quality schools. This can be achieved by an ordinance covering the entire jurisdiction, an overlay district over a redeveloping area, a negotiated development agreement, or through other creative methods. Other types of flexibility in implementation include allowing the developer to build at a site other than the market rate development and paying fees or donating land instead of including affordable units in their plans. Over the past five decades, more than 400 jurisdictions nationwide have adopted such zoning requirements, including Charlotte, NC; Town of Chapel Hill, NC; Durham, NC; Arlington County, VA; Fairfax County, VA; Cambridge, MA; Boulder, CO, Montclair, NJ.

Montgomery County, MD was one of the first counties in the United States to first implement it in 1973 by modifying their local zoning ordinance to include inclusionary zoning plans. According to the change in their regulation, between 12.5% and 15% of homes in each development with 20 or more units were required to meet the criteria for so called Moderately Priced Dwelling Units (MPDU). It helped them with their goal of creating affordable housing, while also benefiting developers at the same time. Their zoning ordinance allows a density increase of up to 22% above the normal density permitted under the zone and allows some attached housing in single-family zoning classifications so that optimum development of the property can be achieved and less costly housing can be constructed. The density bonus, in effect, creates free lots upon which the MPDUs are constructed. The Montgomery County Department of Housing and Community Affairs (DHCA) provides the maximum allowable income limit, which is set at 70% of the area median income determined by HUD, for both the rental and purchase programs annually.

Their Moderately Priced Dwelling Unit Program's main goals consist of:

- Production of moderately priced housing
- Distribution of low and moderate-income households throughout the growth areas of the county
- Expanding and retaining an inventory of low-income housing in the County through partnership with the Housing Opportunities Commission (HOC) and nonprofit housing providers.

According to the University of North Carolina School of Government, there are three types of inclusionary zoning, which are called voluntary, conditional, and mandatory programs. Because of the complexity of these programs, local governments must conduct due diligence to determine which model would fit best. Creating a panel of market experts, such as county officials, developers, attorneys, and academics can help examine and understand how these changes would affect the community in positive and negative ways. Studies show that the voluntary provisions are the kind supported by developers, but usually unsuccessful in adding new affordable housing stocks (examples of Cambridge, MA and Boulder, CO).

There are risks that come with implementing inclusionary zoning policies. Some of those risks are:

- Without additional incentives being offered, developers might build somewhere else.
- Developers can make up the loss on the affordable units by marketing the market rate units at a higher rate and thus affecting the purchasing power of middle-class buyers.
- There are inclusionary zoning provisions that allow the developers to have the option of building affordable housing elsewhere in the community instead of on-site. It reduces the

construction costs, but it can also drive these new constructions back into lower socioeconomic areas of the community.

- Certain kinds of policies in these programs can cause dramatic reductions in housing construction. To avoid it happening, San Francisco, CA allows for developers to contribute to an affordable-housing fund instead of satisfying IZ requirements.
- Without upfront commitment to long-term affordability of the selected units, the program will not meet ongoing affordability challenges.

The success of the program can be impacted by the jurisdiction's financial resources, staff capacity and expertise that will be needed to implement a complex program like that. It is harder for smaller and less wealthier jurisdictions to continue administering inclusionary zoning programs in the long run.

### Program Related Concepts

Another approach to providing affordable housing is the **Aging in Place** concept, which creates housing and health care options to provide support for aging individuals to live independently.



Bringing resources to older adults (55+) and offering programs that can help with the design and construction of existing homes through universal design features is a critical component of the Aging in Place program. This process includes, but is not limited to, having at least one step free entrance into the home; wider doorways; single floor living with bedroom, family room and full bathroom on the main floor; and

easy to use handles, grab bars and switches, thus, enabling homeowners to age safely and with dignity. These design features could be incorporated when addressing local code and housing standard violations through a housing rehabilitation program. Federal Community Development Block Grant funds can be used to offset the cost of rehabilitation, which also helps with the cost burden on the homeowner. According to the 2010 Census and 2019 ACS 5-Years Estimates Data, Union County's population of 65 and over living in poverty has increased by about 56% in the last decade.

Creating a **Virtual Fair Housing Platform** as a one stop shop for housing tools and resources for both residents and service providers would be beneficial for the entire community. It could take place among Union County's existing website and be managed by Union County. This online platform could provide educational materials on tenant and landlord rights, fair housing rights,



human rights, and information of discrimination along with upcoming information sessions and trainings on fair housing. The webpage could also provide a list of service providers, property managers, landlords and their contact information.

There are many jurisdictions across the nation, as noted below, that choose drastic approaches to tackle affordable housing such as **investing in their own affordable housing stock**. This allows jurisdictions to allocate private housing stock into the hands the public or non-profit entities.

- Dallas Housing Authority purchased a 347-unit apartment complex next to a commuter rail station
- Missoula Housing Authority in Montana bought a 96-unit apartment building
- Gary Housing Authority in Indiana purchased a disused elementary school to tun it into affordable housing
- Cambridge Housing Authority, MA is buying existing properties
- King County Housing Authority, WA has contributed 7,000 units of affordable housing since 2000
- Minneapolis and St. Paul have a joint affordable housing preservation fund that is being used to buy 1,500 homes in both cities

HUD has also been trying to provide more flexibility for housing authorities with program requirements that are less restrictive in using federal funds through a new program called **“Moving to Work”**. Moving to Work allows public housing organizations to buy and preserve existing housing and develop new affordable housing projects. Without having to pay real estate taxes, owning affordable housing can be more lucrative for housing authorities. This can also help build up enough funds to also take on new developments in the future.

Providing **creative financing solutions** through local financing institutions that further allow renters to qualify for a mortgage is an additional way to aid individuals and families. This process is largely critical to support minorities and low-moderate income individuals in the ability to purchase affordable homes. Local non-profit organizations can potentially use CDBG funds to assist renters in improving their financial situation, credit scores and, therefore, their borrowing power. These federal funds can also be used to provide down payment assistance. Renters face several financial and other barriers and overcoming these barriers will help them reach housing affordability. The housing affordability gap has been and continues to be a multi-dimensional problem for communities throughout the country. There is not one specific strategy that can address it all, thus, there must be different strategies and tools used to either increase income and/or reduce costs to provide affordability for the low- and moderate-income population. The underlying causes of the affordability shortfall and the nature of the local market will need to be

examined and understood to select an effective combination of approaches and strategies to address affordable housing shortages in Union County.

Affordable housing works best when it provides more than just a place to live. Without government subsidies and policy support, it is difficult to make affordable housing development happen. A collaborative effort among government leaders on all levels and non-profit organizations in the community is critical to transpire creative solutions.

Some examples nationwide for such alliances are:

- Denver’s \$10 million Revolving Affordable Housing Loan Fund – widening the capital pool for affordable housing projects.
- Denver’s pilot “buy-down” program – turning vacant high-end apartments into affordable housing units by covering the difference between the market rate rent and affordable rent using the city’s housing fund.
- Paseo Verde project in Philadelphia – an affordable housing project next to a transit hub, that offers landscaped terraces, green roof for sustainable lifestyle, several healthcare facilities under one roof, a pharmacy, and a healthcare clinic run by the Public Health Management Corporation.
- Woodlawn neighborhood in Chicago – connects residents with community service such as an in-house community resource center for job and skills training.
- East-Lake Community in Atlanta – affordable housing was built around the Charles R. Drew Charter School system, which connects children to one of the district’s best education systems.
- Cleveland Housing Network – provides a lease to purchase program at a discounted price after 15 years of leasing.

Ultimately, this report concludes that a county-wide Fair Housing Council comprised of a diverse group of subject matter experts and service providers in the housing industry is necessary. The Fair Housing Council should examine these fair housing best practices and recommend specific solutions to the Board of County Commissioners that meet the fair and affordable housing needs in the County.

## SUMMARY OF FINDINGS

This Analysis of Impediments to Fair Housing Choice identifies barriers that could limit housing choice for residents of Union County. Impediments to fair housing can be complex in nature and

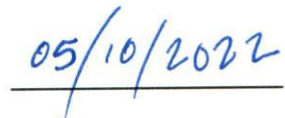
are embedded in the fabric of the community through different layers, such as the social, cultural, and economic levels. There is no one strategy that fits all. The barriers can prevent residents from recognizing their rights to fair treatment under federal fair housing laws as it shows with the number of fair housing complaints submitted (10) between 2016 and 2021. Education is the fundamental foundation of fighting against discrimination and a power tool to increase awareness. It is important that Union County residents understand what steps they can take when they have experienced some form of housing discrimination. Furthering Fair Housing will require municipalities, agencies, and organizations across the County to work within their own divisions to create and monitor unbiased policies, correspond with each other to identify strengths and limitations of strategies, and implement solutions to existing and new barriers.

## CERTIFICATION

Union County does hereby certify that this 2022-2026 Analysis of Impediments to Fair Housing Choice follows the intent and directives of the Community Development Block Grant (CDBG) program regulations. Union County certifies that it will affirmatively further fair housing during the planning period.



Mark Watson, County Manager



Date

