

Analysis of Impediments to Fair Housing Choice

CITY OF ROCKY MOUNT AND THE DOWN EAST HOME CONSORTIUM

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ROCKY MOUNT, NC
THE CENTER OF IT ALL

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Introduction & Executive Summary of the Analysis

Why the AI was Developed

On September 8, 2020, a Final Rule published by the U.S. Department of Housing & Urban Development (HUD) titled *Preserving Community and Neighborhood Choice* became effective. This rule revised the definition of “fair housing” to include “housing that, among other attributes, is affordable, safe, decent, free of unlawful discrimination, and accessible as required under civil rights laws.” The rule also substantially broadened the definition of “affirmatively furthering fair housing” to mean “any action rationally related to promoting any attribute or attributes of fair housing”. Notably, the rule also eliminated the previously long-standing requirement that States and other HUD grantees prepare an Analysis of Impediments to Fair Housing Choice (an AI) as the means for evaluating the degree to which private and public sector policies, practices, statutes and programs expand or restrict housing choice for members of the protected classes.¹

Although the Final Rule eliminated the requirement to prepare an AI, it retained the following requirement: *Nothing in this paragraph relieves jurisdictions of their obligations under civil rights and fair housing statutes and regulations.*² In other words, HUD grantees still are required to ensure that they are not contributing to patterns of discrimination within their jurisdictions. For this reason, the City of Rocky Mount and the Down East HOME Consortium, the entities charged with the administration and management of the Community Development Block Grant (CDBG) funding in Rocky Mount and HOME funds in Edgecombe and Nash Counties, chose to move forward with developing the AI. The AI remains a valuable tool to:

- Evaluate residential segregation patterns
- Evaluate how private and public sector policies, practices, statutes and programs expand or restrict housing choice for members of the protected classes
- Identify impediments, or barriers, to fair housing choice
- Implement a Fair Housing Action Plan to lessen or eliminate housing discrimination, and
- Document its efforts at expanding housing choice for members of the protected classes

Participants

As the lead agency in the preparation of the AI, Rocky Mount was committed to an extensive outreach process to solicit input from residents and stakeholders. Outreach initiatives included remote public meetings, remote stakeholder meetings and an online survey; meetings were held remotely due to the COVID-19 pandemic and were held on:

- Monday, November 30, 2020 from 1pm to 2:30pm
- Tuesday, December 1, 2020 from 10am to 11:30am
- Tuesday, December 1, 2020 from 3pm to 4:30pm

¹ Under the federal Fair Housing Act, it is illegal to discriminate against someone in housing based on their race, color, religion, sex, disability, familial status or national origin. These are collectively referred to as “members of protected classes” because these personal characteristics are protected by law. The North Carolina Fair Housing Act includes these same seven protected classes; it also includes a prohibition against discrimination in the siting of affordable housing.

² Preserving Community and Neighborhood Choice Final Rule, 24 C.F.R. § 5, 91, 92, 570, 574, 576, 903 (2020).

- Wednesday, December 2, 2020 from 11am to 12:30pm.

The Participation Appendix includes the documentation of the Public Engagement Plan, which describes all outreach activities, provides lists of all attendees and complete summaries of all meetings held in conjunction with the outreach conducted for the Three-Year Consolidated Plan. The survey had a low response rate and no additional analysis was done on the results as the sample size is too small to be meaningful. The anonymous survey responses included in the Participation Appendix.

Methodology Used

A comprehensive approach was used to complete the AI. The following sources were utilized:

- Most recently available demographic data regarding population, household, housing, income, and employment at the census tract, city and county levels.
- A variety of online databases providing indicators that reflect local issues and based on research that validates the connections between the indicators and increased opportunity in Edgecombe and Nash Counties and Rocky Mount.
- Public policies, codes and statutes affecting the siting and development of housing
- Administrative policies concerning fair housing, affordable housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Fair housing complaints filed with HUD and the Rocky Mount Human Relations Commission, and
- Interviews and stakeholder meetings conducted with state agencies and non-governmental organizations that provide housing and housing related services to members of the protected classes.

How AI was Funded

The AI was funded with CDBG funds from Rocky Mount.

Progress Achieved since Previous AI

The goals and actions set forth in the previous AI were broad and, in some cases, aspirational, meaning that the goals were unlikely to be achieved within a three-year timeframe because of the extent of the resources – human and financial – required to meet the needs. In addition, there has been a complete turnover in CDBG staffing since the 2018 AI was completed and time was needed for new staff members to go through the CDBG onboarding process. The City now has a solid organization and cohesive staff that can now take on implementation of the AI fair housing action plan as part of their day-to-day activities. Despite challenges associated with staff turnover, the City of Rocky Mount and the Down East HOME Consortium partners have made progress over the last three years in implementing some of the actions as described below.

The following table outlines the goals and timeframes defined in the previous AI as well as provides an update on the progress achieved since then. The information provided below is taken from the Consolidated Annual Performance & Evaluation Reports (CAPERs) submitted to HUD annually.

Goals, Recommended Actions, Timeframe and Accomplishments	
Goal 1: Expand Housing Choice and access to opportunity	One-Year Actions
Perform a social and economic impact analysis of current, proposed, and known future development in and around Downtown on the neighborhoods identified by the Housing Study as Targeted Areas of Opportunity.	
Identify leaders in the local Hispanic community and work with them to identify locations and publications to disseminate information about community development programs, fair housing, tenant rights, and affordable housing options to reach people with limited English proficiency. Update the City's Language Access Plan to reflect these new initiatives.	
Continue to provide CDBG funding to non-profits who provide career readiness, job training, and other educational programs targeted towards low-income individuals and members of the protected classes.	
Continue to provide HOME and CDBG assistance for housing rehabilitation and new construction, as applicable, including the facilitation of contractor workshops. Give priority to projects that improve fair housing choice and access to opportunity for members of the protected classes, such as LIHTC developments and supportive housing in high opportunity areas. This includes mixed-income developments that will increase the tax base, benefitting school districts and stimulating private development.	
Continue providing CDBG assistance for public facility and infrastructure accessibility improvements, giving priority to projects in R/ECAPs.	
Work with the housing authorities and other affordable housing providers to develop a cohesive, regional guide to affordable housing options in the region that is updated on an annual basis.	
The City of Rocky Mount should conduct a cost-benefit analysis of the following community revitalization strategies and share the conclusions with the public: general obligation bond for affordable housing rehabilitation, construction, and homeownership assistance; inclusionary zoning and affordable housing set-asides; multi-family tax abatements; and targeted code enforcement.	
Using the Rocky Mount Citizens' Workforce Housing Advisory Commission proposal as a framework, explore the creation of an advisory group of citizens that monitors real estate activities and helps inform policies to prevent displacement while encouraging equitable economic development in neighborhoods.	

Two-Year Actions
Begin to implement any community revitalization strategies determined to be feasible through the cost-benefit analysis.
Develop an implementation plan that builds on the strategies outlined in the City's Crossroad to Prosperity housing report.
Three-Year Actions
Select an eligible area in the City for designation as a Neighborhood Revitalization Strategy Area to take advantage of the more flexible HUD regulations associated with the designation.
Assess the development review process to identify opportunities for improved efficiency, expediency, and coordination.
Work with planning staff to focus demolition efforts in a specific, targeted manner.
Work with planning staff to examine the feasibility of developing a vacant property registration ordinance and a rental registration ordinance in the City of Rocky Mount.
Work with planning staff to determine the feasibility of developing a residential infill development overlay district that allows for relaxed minimum lot size standards and setbacks to promote reuse of vacant lots in the City of Rocky Mount.
Accomplishments
<p>The goal of expanding housing choice and access to opportunity has been ongoing and will continue to be a goal as the level of need far exceeds the available resources. Expanding housing choice is a balance between improving the living environs of households living in areas of higher poverty as well as providing pathways to housing choice in areas of higher opportunity. The housing rehabilitation programs are essential to toward accomplishing this goal, though the demand far exceeds what can be accomplished with the available resources. The following has been accomplished during PY18 and PY19 with respect to expanding housing choice and access to opportunity: 192 Energy Share Rebates Granted (City of Rocky Mount utility customers); 37 Urgent Repairs completed; 26 Housing Repair completed; 54 Housing Rehab Matching Rebates completed; 2 single-family unit rehabs in progress in Edgecombe County; and Shared lead abatement information with all rehab clients and lead removed in each rehab conducted. The United Community Ministries House the Children at the Bassett Center provided housing and case management to 63 homeless families. These families consisted of 235 persons (151 children and 84 adults).</p> <p>In addition to housing benefits provided, the Rocky Mount Edgecombe Community Development Corporation Business Counseling Center provided one-on-one business counseling and technical assistance to 100 persons in target areas of the City of Rocky Mount using federal funds. Highway Construction Class provided instruction to 31 students; the Boys and Girls Club gave real hands-on job training to 19 local high school students; and the Buck Leonard Association for Sports & Human Enrichment Mitchell House Construction Trades Project provided 27 low-to-moderate income individuals with job training. Lastly, Rocky Mount successfully solicited new Section 3 businesses and qualified individuals.</p> <p>The City of Rocky Mount updated its Language Access Plan in July 2020 to improve the efforts and process of reaching out to persons with limited English proficiency.</p> <p>Maps of locations of investments (see the AI section on Assisted Housing Location Patterns) indicate that investments are located both in the Near R/ECAP as well as areas of higher opportunity. The City has started the process to determine if there are areas within the City that would qualify as a NRSA; this effort is ongoing.</p> <p>The City has undertaken efforts to research the efforts such as inclusionary zoning, tax abatement and bond financing among others to prepare for doing a cost-benefit analysis. These efforts are underway. In 2020, the City began work on an Affordable Housing Study, which will be completed in 2021. The study is linked to Crossroads to Prosperity and includes case studies from other cities.</p> <p>In 2017, the City of Rocky Mount implemented its redevelopment overlay districts (RDOD) to focus on the preservation and rehabilitation of existing neighborhoods and ensure compatibility of existing and new infill development. The ordinance relaxes minimum setbacks as an incentive for development. Currently, RDOD is limited to three areas in the City: Beal Street, Holly Street, and Ravenwood Crossing.</p>

Goal 2: Increase homeownership among low-income households and members of the protected classes
One-Year Actions
Continue the provision of funding to organizations who provide homebuyer and foreclosure counseling services.
Three-Year Actions
Work with the regional lending community to explore the feasibility of developing a mortgage loan pool targeted to households who may not qualify for traditional mortgage products.
Accomplishments
The Rocky Mount Edgecombe Community Development Corporation Housing Counseling Center provided foreclosure mitigation and pre-purchase housing counseling to 115 homeowners in PY 2018 and continues this work as assist households. The City is still committed to working with the local Community Development Finance Institution (CDFI) to create a mortgage product that would allow for lower credit scores and lower down payments than traditional lenders.
Goal 3: Improve the utility of public transit for low-income and disabled persons
One-Year Actions
Within one year, identify any key community asset or major employer currently underserved by transit service.
Accomplishments
This particular goal is one that cannot be resolved using CDBG and HOME funds alone. While it is an impediment to fair housing, the resolution of a transit solution is one that will require a concerted effort and potentially a multi-jurisdictional solution. The City of Rocky Mount remains committed to continuing to work to improve the transit system to best serve residents.
Goal 4: Strengthen antidiscrimination investigation, enforcement, and operations
One-Year Actions
Continue to support the City of Rocky Mount Human Relations Commission's and Edgecombe County's fair housing related activities.
Improve coordination and communication between the Human Relations Commission and the Community Development division.
Three-Year Actions
Contract with a Qualified Fair Housing Enforcement Organization to conduct paired discrimination testing in the rental market.
Accomplishments
Each year, the Human Relations Department receives and responds to housing-related complaints. In 2018, there were 202 complaints received, most of which were from Black or African American residents. In 2019, there were 188 complaints, most of which were from Black or African American residents. Staff continues to assist Hispanic persons with housing-related issues, mostly in the rental market but also some issues related to home purchases. Human Relations staff continue to serve as hearing officers for Nash-Edgecombe Economic Development, Inc. for their Section 8 clients facing evictions.
To facilitate communication, the Human Relations Department prepares a memo summarizing the number of complaints received during the year as well as activities and initiatives undertaken including education and outreach events.
Goal 5: Increase the level of fair housing knowledge and understanding among landlords and the general public
One-Year Actions
Continue partnering with Nash and Edgecombe counties to hold an annual Fair Housing Forum.
Continue to support other fair housing activities conducted by the City of Rocky Mount Human Relations Commission

Three-Year Actions
Develop a user-friendly, region specific fair housing guidebook to be distributed to neighborhood organizations and under-served populations throughout the region, including those with limited English proficiency.
Accomplishments
The Human Relations Commission, Community & Business Development, and Rocky Mount Housing Authority co-sponsored the Annual Fair Housing Forum in April 2019 which included the following presenters: NC Association of Community Development Corporation; Legal Aide of North Carolina; Rocky Mount Housing Authority and City of Rocky Mount Community Development. April 2019 and 2020 were declared Fair Housing Months in the City of Rocky Mount. The Department continues to provide assistance to nineteen (19) neighborhood associations -providing Landlord/Tenant training for several of the groups. The Director serves on the Twin Counties Housing Commission to end homelessness. The City supported RMECDC's Loss Mitigation/Foreclosure Counseling and Housing Counseling programs that include information on fair housing. The Human Relations Commission has also partnered with Community & Business Development and Legal Aide of NC to co-sponsor the Annual fair Housing Forum and focused on housing rights for persons with disabilities.

Conclusions

Several impediments to fair housing choice were identified and are described below, most of which were identified in the previous AI. The impediments are carried over because they are still relevant today. The only new impediment identified is related to accessory dwelling units (ADU) as described below. Based on these impediments, a Fair Housing Action Plan with recommendations to be undertaken by Rocky Mount and its collaborating partners over the next three years was developed and is also described below.

Impediments Found

Lower employment rates and wages for certain members of the protected classes reduce housing choice.

- Members of the protected classes tend to have lower incomes and higher unemployment rates than their counterparts. Persons with disabilities participate in the labor force at lower rates than persons without disabilities. While fair housing and affordable housing are distinct from each other, there is a link when affordable housing is not located throughout a jurisdiction, including in higher opportunity areas, housing choice is restricted.
- The housing stock tends to be deteriorating and in need of rehabilitation, particularly among the more affordable units.

Limited housing choice results in Housing Choice Voucher (HCV) concentration in primarily in older, less expensive communities, including the Near R/ECAP in Rocky Mount.

- The mapped locations of HCV holders indicate that voucher holders tend to find units in southern Rocky Mount, which overall has lower access to opportunities than other sections of the City or in Nash County.
- The high representation of protected classes, particularly persons with disabilities, in the HCV waiting list may indicate a lack of affordable housing options for these households in the private market.
- In Rocky Mount, older units built prior to 1978 are located throughout the City including in the Near R/ECAP. Units built prior to 1978 are likely to have lead paint, which poses a health risk to occupants, particularly those who are not yet school-aged.

Non-white households were less likely to be homeowners and are more likely to have been denied a mortgage or offered a high-cost loan than white households.

- Homeownership has historically been a way for a family to create generational wealth, which allows those families additional opportunities such as accessing equity to pay for higher education or start a business. Increasing homeownership rates among members of the protected classes can assist in wealth-building.
- Black and Hispanic mortgage applicants are denied at higher rates and, when adjusted for income, non-whites are offered high-cost loans more often than their white counterparts. However, the sample size is small in the high-cost loan analysis so those results are not conclusive.

Moderate levels of segregation exist in Edgecombe County and Rocky Mount and members of the protected classes are more likely to live in the Near R/ECAPs.

- Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing. The analysis showed that members of the protected classes tended to have higher rates of poverty and are more likely to reside in Near R/ECAPs as housing is more affordable there than in other areas.

A lack of available transportation in areas outside of Rocky Mount leaves residents dependent on private vehicles which disproportionately affects members of the protected classes from accessing opportunities such as job centers located outside of city limits.

- While transportation exists within the City of Rocky Mount, residents without access to a private vehicle have difficulty accessing resources located outside of city limits. Identifying community assets such as potential partnerships between developers and employers to create workforce housing near job centers or re-evaluation of current transit routes could assist Twin Counties residents in accessing those employment locations. Unemployment is higher in the City than in the counties.

While the City of Rocky Mount has an existing zoning policy on ADUs that permits them in all residential districts by right, only the property owner, family members, or potential caregivers employed on the premises can use it.

- ADUs have the potential to supply affordable housing due to lower land and construction costs. Additionally, ADUs can be integrated into the surrounding neighborhood by design to maintain community character. While the City of Rocky Mount has an existing policy on ADUs that permits them in all residential districts by right, only the property owner, family members, or potential caregivers employed on the premises can use it. Guests are limited to six months in any year to use the ADU. Eliminating or reducing these limitations could increase the supply of affordable housing in

Goals and Actions to Address Impediments

Goal	Actions	Timeframe and Metrics	Responsible Entity
Goal 1: Expand housing choice and access to opportunity	Continue to provide HOME and CDBG assistance for housing rehabilitation and new construction, as applicable, including the facilitation of contractor workshops. Give priority to projects that improve fair housing choice and access to opportunity for members of the protected classes, such as LIHTC developments and supportive housing in high opportunity areas. This includes mixed-income developments that will increase the tax base, benefitting school districts and stimulating private development.	On-going Acquisition 3yrs Contractor Meeting 6 months	CBD Dept
	Continue providing CDBG assistance for public facility and infrastructure accessibility improvements, giving priority to projects in R/ECAPs.	Ongoing	CBD Dept Subrecipients
	Complete the analysis to determine which areas meet the criteria to be designated as a Neighborhood Revitalization Strategy Area (NRSA) to take advantage of the more flexible HUD regulations associated with the designation. If the eligible areas overlap with other planning districts, coordinate redevelopment and investments to leverage funds.	3-5 Years	CBD Dept Development Services Budget & Elevation Dept
	Work with the housing authorities and other affordable housing providers to develop a cohesive, regional guide to affordable housing options in the region that is updated on an annual basis. A starting point is the Assisted Inventory list provided in this AI.	Ongoing	CBD Dept Subrecipients Developers Certified CHDOs
	Continue to provide CDBG funding to non-profits who provide career readiness, job training, and other educational programs targeted towards low-income individuals and members of the protected classes.	Ongoing	CBD Dept Subrecipients
	Identify any key community asset or major employer currently underserved by transit service and initiate discussions to determine the feasibility to altering the transit route, recognizing that this could rely on regional coordination if Rocky Mount begins to provide transit outside of city limits.	Ongoing	Workforce Advisory Commission? Tar River Transit CBD Dept
	The City of Rocky Mount should complete the cost-benefit analysis of the following community revitalization strategies and share the conclusions with the public: general obligation bond for affordable housing rehabilitation, construction, and homeownership assistance; inclusionary zoning and affordable housing set-asides; multi-family tax abatements; and equitable code enforcement.	Ongoing 6 months-1 yr	CBD Dept Budget & Evaluation Dept

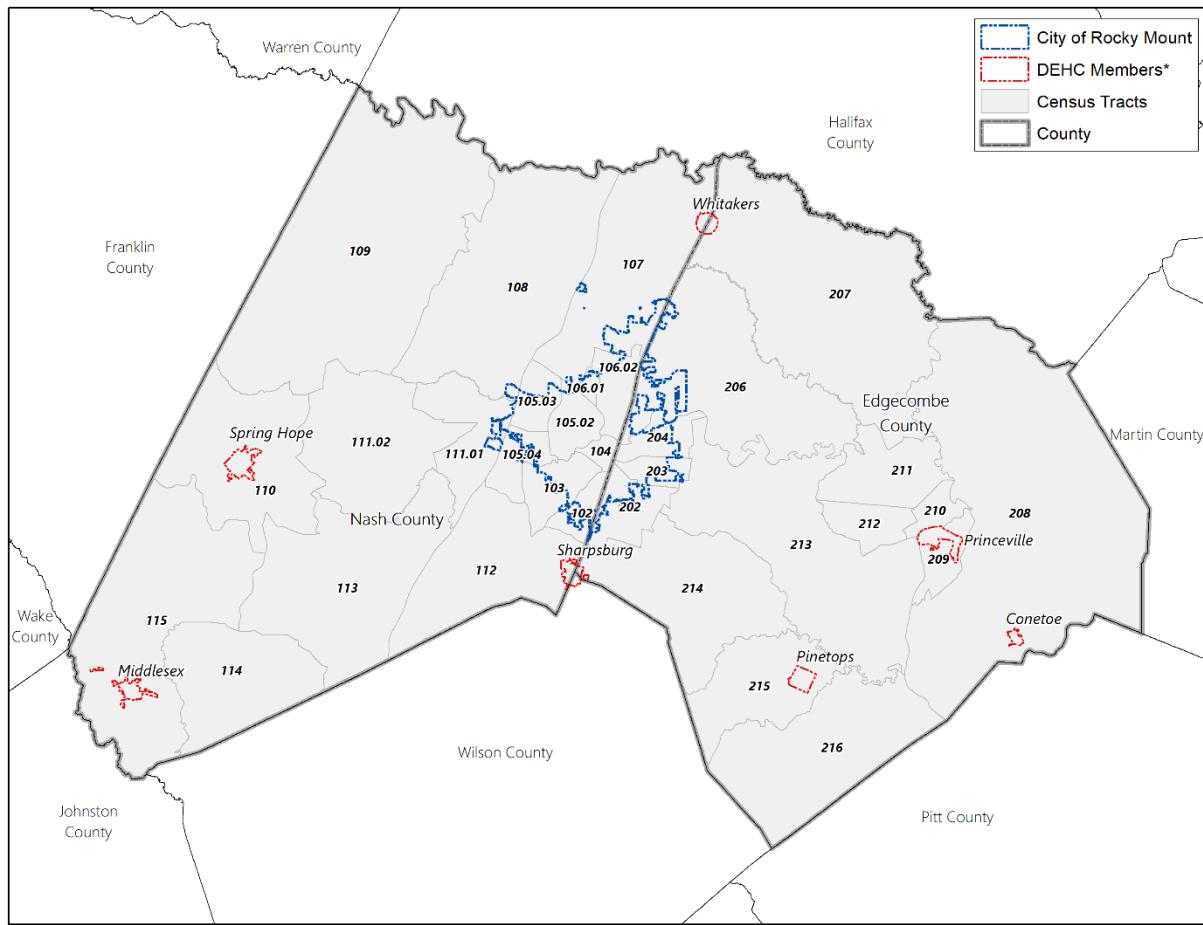
Goal	Actions	Timeframe and Metrics	Responsible Entity
	Begin to implement any community revitalization strategies determined to be feasible through the completed cost-benefit analysis.	Ongoing 6months-1yr	CBD Dept Budget Analyst & Elevation Dept
	Assess the development review process to identify opportunities for improved efficiency, expediency, and coordination.	Ongoing	Development Services CBD Dept
	Work with planning staff to focus demolition efforts in a specific, equitable manner as ordered by City Council.	Ongoing	CBD Dept Development Services
	Work with planning staff to examine the feasibility of developing a vacant property registration ordinance and a rental registration ordinance in the City of Rocky Mount.	Completed - Not feasible due to changes in state legislation	Development Services CBD Dept
	Work with planning staff to examine the feasibility of establishing a rental registration ordinance in the City of Rocky Mount.	Completed - Not feasible due to changes in state legislation	Development Services CBD Dept
	Work with planning staff change existing standards to allow for relaxed minimum lot size standards and setbacks to promote reuse of vacant lots in the City of Rocky Mount.	Ongoing	Development Services
	Continue to engage with Community Academy to monitor real estate activities and to help prevent displacement while encouraging equitable development in neighborhoods.	Ongoing	Development Services CBD Dept
	Conduct an analysis of the Housing Rehab Matching Rehab program funded to determine the extent to which the program furthers fair housing and make adjustments, if necessary. Included in the analysis are policies and procedures as well as beneficiaries.	Completed	CBD Dept
Goal 2: Increase homeownership among low-income households and members of the protected classes	Continue the provision of funding to organizations who provide homebuyer and foreclosure counseling services.	Ongoing	CBD Dept Subrecipients
	Work with the regional lending community to explore the feasibility of developing a mortgage loan pool targeted to households who may not qualify for traditional mortgage products.	2yrs	CBD Dept Subrecipients

Goal	Actions	Timeframe and Metrics	Responsible Entity
Goal 3: Strengthen antidiscrimination investigation, enforcement, and operations	Continue to support the City of Rocky Mount Human Relations Commission's and Edgecombe County's fair housing related activities.	Ongoing	CBD Dept Human Relations
	Continue coordination and communication between the Human Relations Commission and the Community Development division.	Ongoing	CBD Dept Human Relations
	The Human Relations and Community Development Departments should coordinate with the Workforce Housing Advisory Commission to promote fair and affordable housing.	Ongoing	CBD Dept Human Relations WHAC
Goal 4: Increase the level of fair housing knowledge and understanding among landlords and the general public	Contract with a Qualified Fair Housing Enforcement Organization to conduct paired discrimination testing in the rental market and in the lending market.	Ongoing 1-2yr	CBD Dept Human Relations
	Continue partnering with Nash and Edgecombe counties to hold an annual Fair Housing Forum.	Ongoing Twice a year Once in April	CBD Dept Human Relations
	Continue to support other fair housing activities conducted by the City of Rocky Mount Human Relations Commission	Ongoing	CBD Dept Human Relations
	Develop a user-friendly, region specific fair housing guidebook, available in English and Spanish, to be distributed to neighborhood organizations and under-served populations throughout the region, including those with limited English proficiency.	Ongoing 1-2yrs	CBD Dept Human Relations
Goal 5: Implement affordable housing bond	Continue research toward implementation of an affordable housing bond	July 1, 2021	City Manager

Jurisdictional Background Data

The scope of the AI encompasses the City of Rocky Mount, Edgecombe County and the municipalities of Conetoe, Pinetops, Princeville, Sharpsburg, Whitakers, Middlesex and Spring Hope. When “the region” is referenced, it will refer to the whole of Rocky Mount and Edgecombe and Nash Counties. Data analysis is primarily conducted at the county- and city-level, though maps and certain analyses such as the Dissimilarity Index and the Opportunity Indices are at the census tract level.

Map 1 County Map of North Carolina



*Edgecombe County and the City

Demographic, Income and Employment Data

This section will describe demographic characteristics that affect housing choice among residents. It will provide context to existing conditions and pinpoint issues to inform strategies for broadening the availability of housing opportunities among residents.

Key Findings

- Between 2000 and 2018, the region has had inconsistent growth; the population increased from 2000 to 2010 but declined from 2010 to 2018.
- Overall, Edgecombe County and Rocky Mount have moderate levels of segregation while Nash County has a low level of segregation in 2018 though segregation has changed since 2015.
- Within the three jurisdictions of Edgecombe and Nash Counties and Rocky Mount, 49% of all foreign-born persons were born in Mexico, which is consistent with the patterns revealed in the last AI.
- In the Rocky Mount region, Spanish or Spanish Creole is the language most often spoken by persons with limited English proficiency (LEP); these persons comprise 2.1% of the region's population. Because there are a combined 3,163 persons with LEP who speak Spanish or Spanish Creole, this triggers the safe harbor threshold for translation of vital documents.
- The Rocky Mount region has a higher prevalence rate than the State at approximately 16% of the population with one or more disabilities with the highest rates for ambulatory and independent living difficulties. Elderly persons are more likely to have an ambulatory difficulty and persons aged 18-64 are more likely to have an independent living difficulty.
- Among the civilian noninstitutionalized population between the ages of 18 and 64, there are significant differences in labor force participation rates among those with and without a disability, which include difficulties with hearing, vision, ambulatory, cognitive, self-care and independent living.
- In Rocky Mount, the median earnings among persons with disabilities was equivalent to 63% of the median earnings of \$26,875 for persons without disabilities. Nash County is slightly higher at 74% while Edgecombe County comes closest to parity at 93%.
- Family households comprised the majority of the region's households at 53.9% in 2018. This is a slight increase from 2015 when family households comprised 52.4% of all households.
- Female-headed households with children often experience difficulty in obtaining housing as a result of lower incomes and higher expenses such as childcare.
- The 2018 median household income was highest in Nash County at \$48,362 and lowest in Edgecombe County at \$35,516. When adjusted for inflation, changes in real household income have varied by race/ethnicity.
- Rocky Mount has the highest unemployment rate suggesting that, overall, residents residing in the Rocky Mount portions of the counties are disproportionately impacted by unemployment.

- Males participate in the labor force at higher rates than women in the aggregate but at lower rates than women with children. Females with children participate in the labor force at rates higher than females in the aggregate and are less likely to be unemployed.
- Persons with one or more disabilities are less likely to participate in the labor force and when they do are more likely to be unemployed than those without a disability.
- Across the region, poverty rates are highest among those under 18 years of age and lowest among those who are 65 and older.
- In Rocky Mount, Black persons are nearly three times are likely to be living below the poverty rate than their white counterparts and only slightly more likely to be living below poverty than Hispanic persons.

Race and Ethnicity

Between 2000 and 2018, the region has had inconsistent growth; the population increased from 2000 to 2010 but declined from 2010 to 2018. Overall population growth was 0.7%.

Within the region, Nash County has grown by 6.4% from 2000 to 2018 while Edgecombe County and Rocky Mount has decreased in population by 4.7% and 2.8%, respectively. Since 2000, the region has consistently had decreases in the white population and increases in the Black and Hispanic populations.

Table 1 Population by Race/Ethnicity 2000-2018

Year	White, non-Hispanic	Black, non-Hispanic	Asian, non-Hispanic	American Indian and Alaska Native, non-Hispanic	Hispanic, any race	Total*
Edgecombe County						
2000	21,998	31,958	93	205	1,627	55,965
2010	21,388	32,164	78	60	2,014	56,247
2015	20,468	31,167	47	176	2,238	55,280
2018	19,394	30,485	55	95	2,358	53,332
Nash County						
2000	53,840	29,853	640	603	3,103	88,376
2010	52,073	34,574	713	362	5,521	94,402
2015	49,439	36,019	720	577	6,138	94,722
2018	47,356	36,713	832	574	6,408	94,003
Rocky Mount						
2000	22,909	31,437	499	319	1,122	56,548
2010	20,661	34,181	536	128	1,472	57,776
2015	16,697	35,759	593	304	1,944	56,642
2018	15,362	35,168	657	131	2,004	54,982

*Note: There are other races represented in the data but their populations are low. The total population includes those races with low populations.
 Sources: 2006-2010 and 2014-2018 ACS (DP05); 2000 Decennial Census (P010)

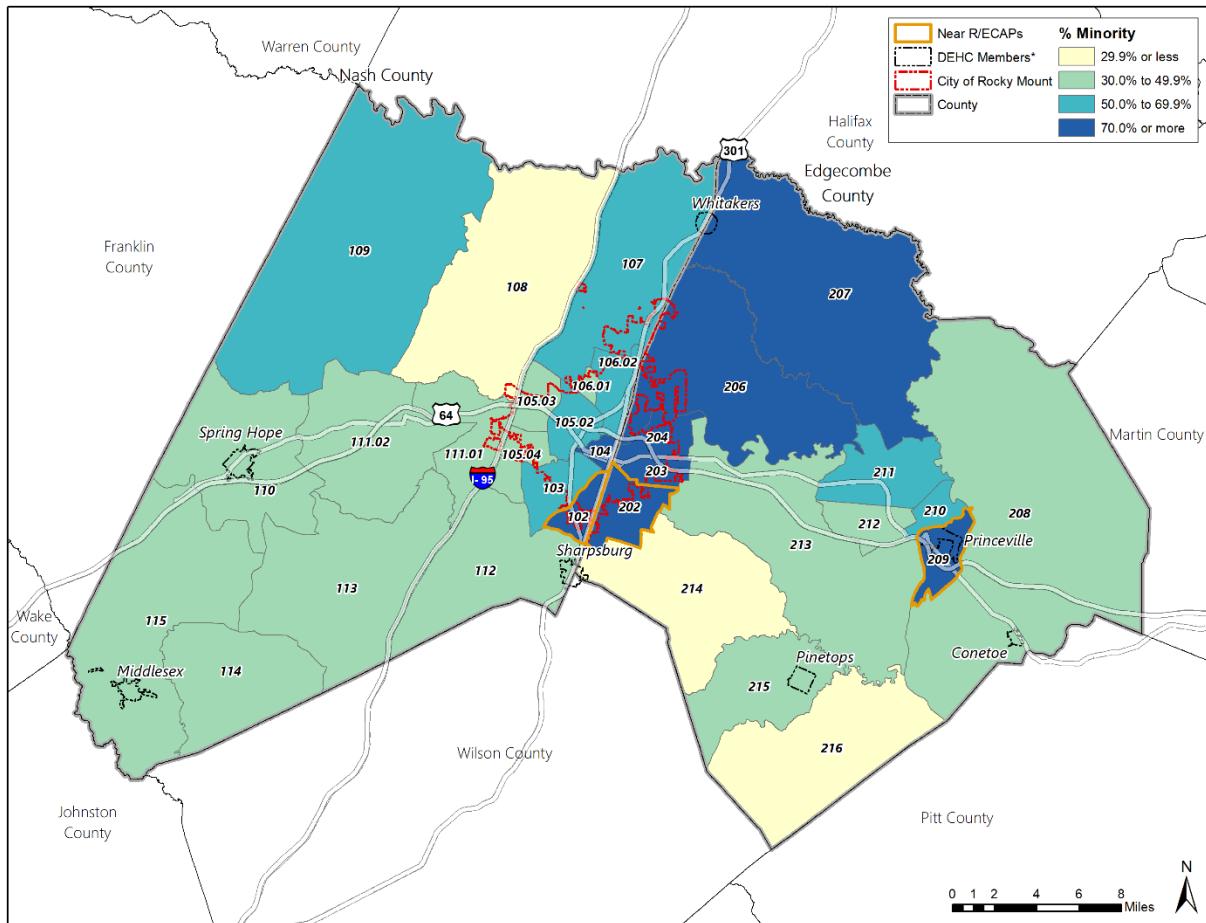
Table 2 Change in Population, 2000-2018

Time Period	White, non-Hispanic	Black, non-Hispanic	Asian, non-Hispanic	American Indian and Alaska Native, non-Hispanic	Hispanic, any race	Total*
Edgecombe County						
2000-2010	-2.8%	0.6%	-16.1%	-70.7%	23.8%	0.5%
2010-2015	-4.3%	-3.1%	-39.7%	193.3%	11.1%	-1.7%
2015-2018	-5.2%	-2.2%	17.0%	-46.0%	5.4%	-3.5%
Nash County						
2000-2010	-3.3%	15.8%	11.4%	-40.0%	77.9%	6.8%
2010-2015	-5.1%	4.2%	1.0%	59.4%	11.2%	0.3%
2015-2018	-4.2%	1.9%	15.6%	-0.5%	4.4%	-0.8%
Rocky Mount						
2000-2010	-9.8%	8.7%	7.4%	-59.9%	31.2%	2.2%
2010-2015	-19.2%	4.6%	10.6%	137.5%	32.1%	-2.0%
2015-2018	-8.0%	-1.7%	10.8%	-56.9%	3.1%	-2.9%

Sources: 2006-2010 and 2014-2018 ACS (DP05); 2000 Decennial Census (P010)

As in the last AI, there are geographic patterns by race; non-white persons tend to reside in the northern portions of both Edgecombe and Nash Counties, with higher concentrations in southeastern Rocky Mount and the Tarboro/Princeville area.

Map 2 Minority Population, 2018

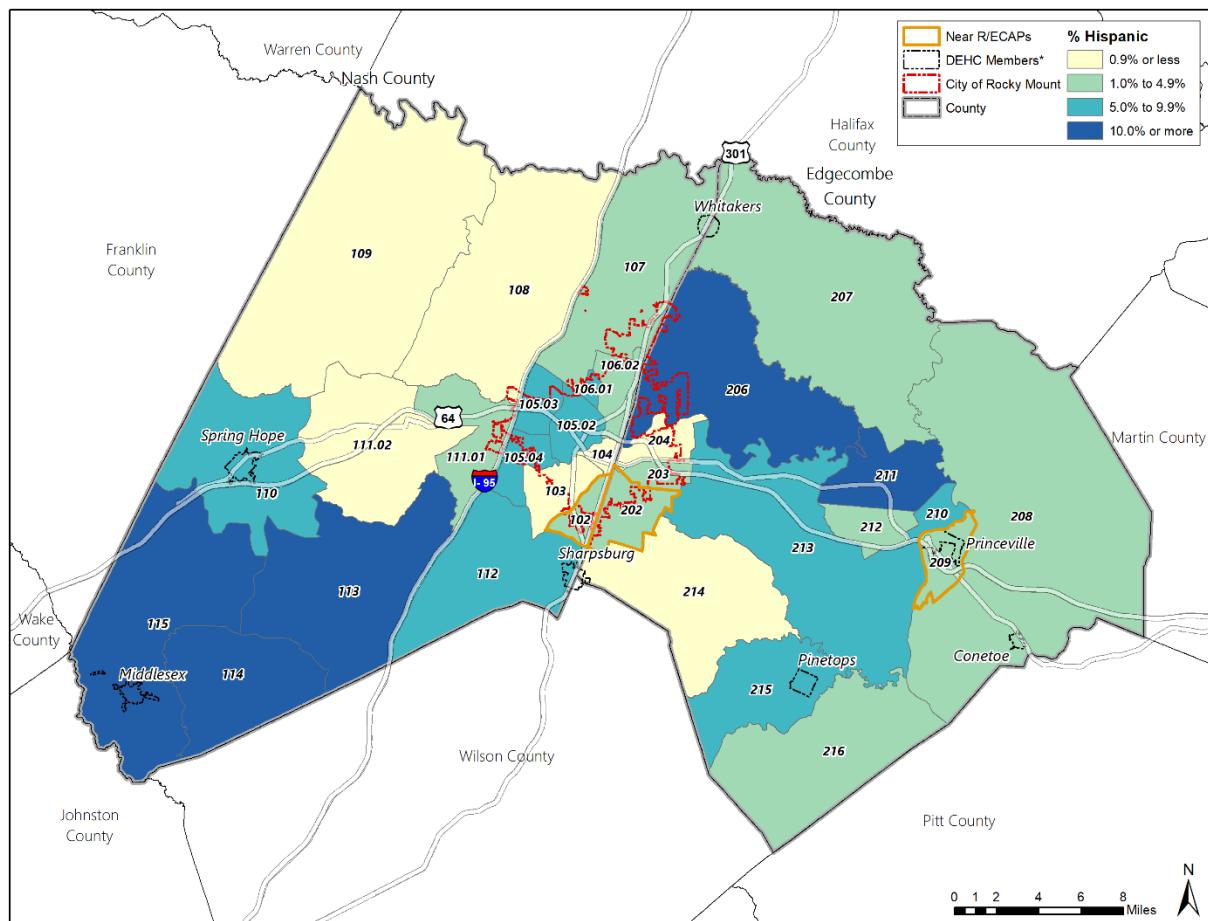


*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2006-2010 & 2014-2018 American Community Survey: B030032

Consistent with the previous AI, Hispanic persons tend to reside in the southern portions of Nash County and in the areas north and east of Rocky Mount. Within Rocky Mount, Hispanic persons are more concentrated in the western part of the City and in the northeastern portions.

Map 3 Hispanic Population, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2006-2010 & 2014-2018 American Community Survey: B030032

Racially/Ethnically Concentrated Areas of Poverty

HUD defines R/ECAPs as census tracts with a non-white population of at least 50% (and 20% outside of metropolitan/micropolitan areas) and a poverty rate that either exceeds 40% or is three times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower. By combining these data, it is possible to determine geographic patterns where there are concentrated areas of poverty among racial/ethnic minorities. Although ethnicity and race as defined by the US Census Bureau are not the same, this study uses rates of both non-white and Hispanic populations to map a single combined group of racial and ethnic concentrations, henceforth referred to collectively as "racially/ethnically concentrated areas of poverty," or R/ECAPs.

Under HUD's definition of racially/ethnically concentrated areas of poverty (R/ECAP), no census tract falls under this definition. HUD defines concentrations of racial and ethnic minorities was as a census tract with a non-white population of 50% or more. A concentrated area of poverty is defined as a census tract with 40% or more individuals living at or below the poverty line. It is important to look at disparities between groups in relation to disproportionate poverty and access to community assets to assess fair housing needs. In the previous AI conducted in 2018, Census Tract 202 in Rocky Mount met the HUD definition of R/ECAP; the tract's poverty rate fell from 43.3% in 2015 to 37.8% in 2018.

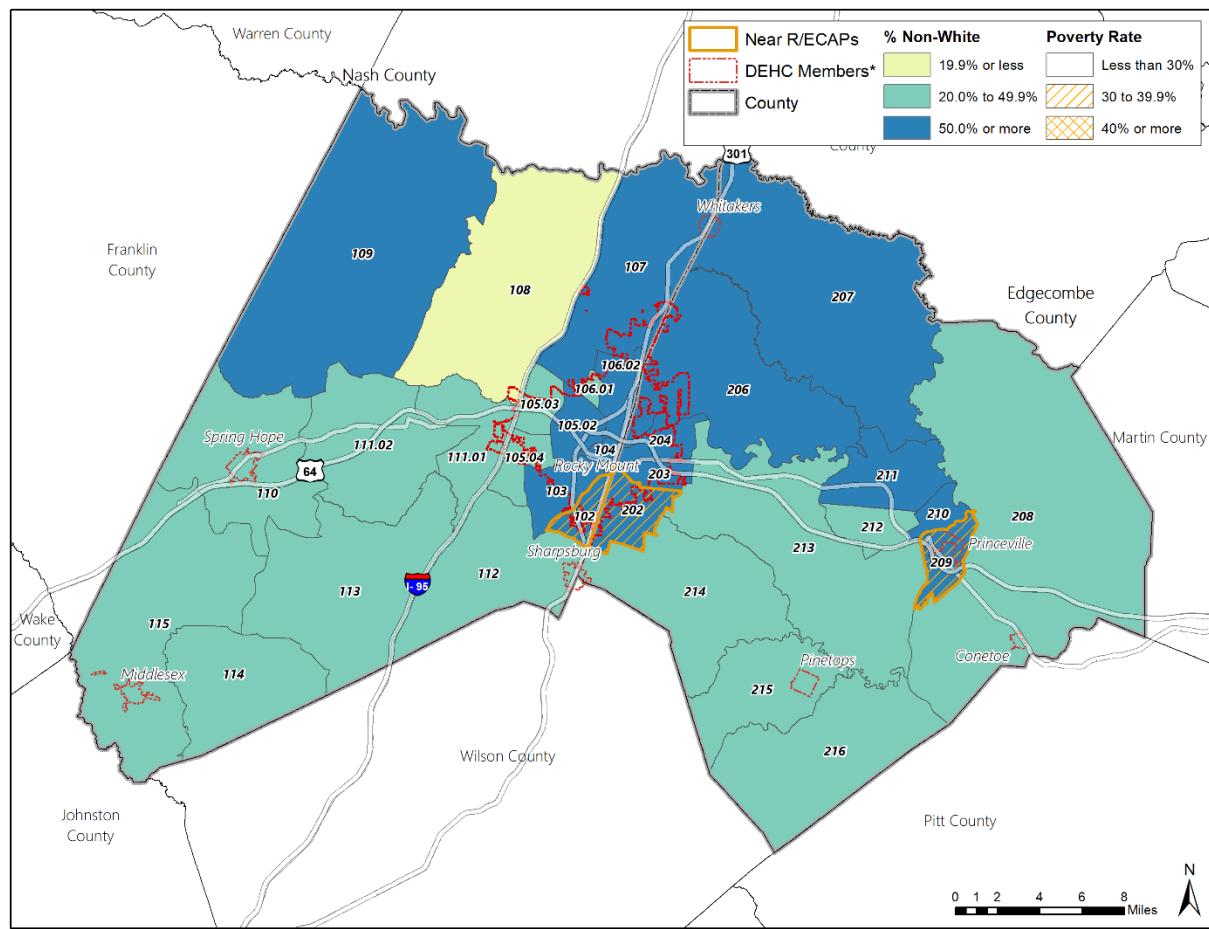
However, two other census tracts in the DEHC jurisdiction nearly meet the HUD threshold. These tracts will be referred to as "Near R/ECAPs" throughout this document and are defined as census tracts with non-white populations greater than 50% and poverty rates higher than 30%. In the previous AI, there were a total of five census tracts that met the definition of Near R/ECAP but have since seen declining poverty rates to values below 30%.

Table 3 Near R/ECAP Summary, 2018

Tract	Municipality	Population	Non-white (>50%)	Poverty Rate (>30%)
102	Rocky Mount	4,611	81.6%	33.9%
202	Rocky Mount	6,330	83.9%	37.8%
209	Princeville	2,768	92.7%	32.9%

Source: 2014-2018 American Community Survey S1701, B03002

Map 4 DEHC R/ECAPs and Near R/ECAPs



Source: 2014-2018 American Community Survey (S1701, B03002)

Dissimilarity Index

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community may create other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

Segregation can be measured using a statistical tool called the dissimilarity index.³ This index measures the degree of separation between racial or ethnic groups living in a community. Since white residents are the majority in the region, albeit by a slim margin, all other racial and ethnic groups were compared to the white population as a baseline. Dissimilarity index scores were determined for each county for Black and Hispanic populations. Because populations other than Black and white are low compared to these groups, there is no Dissimilarity score calculated.

The index of dissimilarity allows for comparisons between subpopulations (i.e. different races/ethnicities), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. According to HUD, a score under 40 is considered low, between 40 and 54 is moderate, and above 60 is high segregation.

³ For a given geographic area, the index is equal to $DI = \frac{1}{2} \sum_i^N \left| \frac{a_i}{A} - \frac{b_i}{B} \right|$, where a_i is the group population of a sub-region (i.e. census tract), A is the group population in the whole region, b_i is the comparison group population in a sub-region, and B is the comparison group's population in the whole region.

Table 4 Dissimilarity Index, 2010-2018

Group Comparison	2010	2018	Change	
			Number	Percent
Edgecombe County				
Black/white	44.3	47.6	3.3	7.4%
Hispanic/Non-Hispanic	45	44.7	-0.3	-0.7%
Nash County				
Black/white	28.5	32.3	3.8	13.3%
Hispanic/Non-Hispanic	25.1	24.2	-0.9	-3.6%
Rocky Mount*				
Black/white	46.7	45.3	-1.4	-3.0%
Hispanic/Non-Hispanic	10.4	12	1.6	15.4%

*Note: The census tracts in Rocky Mount cross the boundaries into both Edgecombe and Nash Counties. The calculation, therefore, includes portions of the population that live outside of Rocky Mount.

Source: 2006-2010 and 2014-2018 ACS (DP05)

Overall, Edgecombe County and Rocky Mount have moderate levels of segregation while Nash County has a low level of segregation in 2018 though segregation has changed since 2015.

In 2018, Edgecombe County had moderate levels of segregation among both the Black and Hispanic populations; Black/white segregation increased 7.4% from 2010 to 2018 while Hispanic/Non-Hispanic segregation decreased by 0.7%. Nash County had low levels of segregation among both the Black and Hispanic populations; however Black/white segregation increased 13.3% from 2010 to 2018 while Hispanic/Non-Hispanic segregation decreased by 3.6%. Rocky Mount had moderate levels of segregation among the Black community and extremely low dissimilarity scores among the Hispanic populations. Black/white segregation decreased 3.0% from 2010 to 2018 while Hispanic/Non-Hispanic segregation decreased by 15.4%. A direct comparison of the current dissimilarity index and the indices from the last AI is not possible since the previous AI used the AFH tool created by HUD and, since that time, the HOME consortium members have changed.

Ancestry and National Origin

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations indicate that there are a total of 5,147 foreign-born persons residing in Nash and Edgecombe Counties, inclusive of Rocky Mount. Among these persons, 2,122 persons (41%) live in Rocky Mount. *Within the three jurisdictions of Edgecombe and Nash Counties and Rocky Mount, 49% of all foreign-born persons were born in Mexico, which is consistent with the patterns revealed in the last AI.*

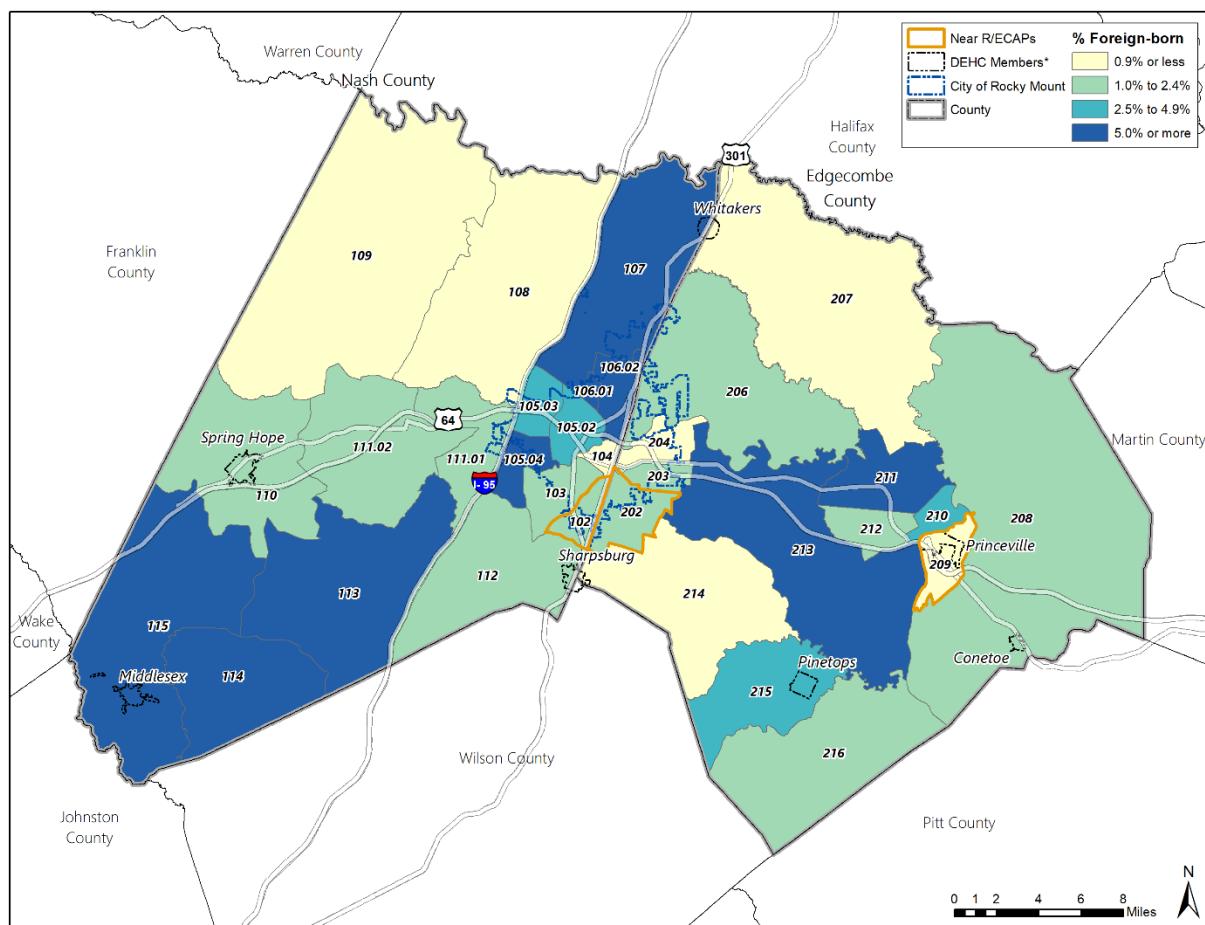
Table 5 Countries of Origin for Foreign-born Residents

Rank	Country of Origin	Population
Edgecombe County		
1	Mexico	658
2	Guatemala	146
3	Dominican Republic	122
4	Other Southern Europe	34
5	Taiwan	23
6	Peru	19
7	Germany	18
8	Costa Rica	16
9	Canada	16
10	Syria	15
Nash County		
1	Mexico	1,854
2	Honduras	251
3	Korea	212
4	Jordan	202
5	Philippines	181
6	India	156
7	Sudan	110
8	Canada	100
9	Ukraine	89
10	Guatemala	85
Rocky Mount		
1	Mexico	639
2	Korea	208
3	Jordan	183
4	Philippines	170
5	India	156
6	Sudan	110
7	Honduras	104
8	Canada	76
9	El Salvador	52
10	Japan	38

Source: 2014-2018 ACS (B05006)

The following map indicates the percentage of residents of each census tracts that are foreign-born. The geographic patterns in 2018 are consistent with the last AI, with higher concentrations of foreign-born persons residing in Rocky Mount, southwestern Nash County and central Edgecombe County. Persons who are foreign-born are not concentrated in the Near R/ECAPs.

Map 5 Foreign-born Population, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2014-2018 American Community Survey: B05006

Limited English Proficiency

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

Local jurisdictions are advised to conduct a four-factor analysis to ensure meaningful access to services for LEP persons. The four factors include:

- The number or proportion of persons with LEP served or encountered in the eligible service population
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity, or service provided
- The resources available and costs to the service provider

Translation of vital documents would be required for any language groups that reaches the LEP threshold of 5%, and at least partially, into any languages that reach the safe harbor threshold of 1,000 persons. The ten largest LEP populations for each geography are listed in the following table. Data is provided at the county and city level because the ACS does not provide LEP data for small geographies such as the smaller towns in Nash and Edgecombe Counties that participate in the DEHC. Edgecombe County only has two languages represented by persons with LEP.

In the Rocky Mount region, Spanish or Spanish Creole is the language most often spoken by persons with LEP; these persons comprise 2.1% of the region's population. Because there are a combined 3,163 persons with LEP who speak Spanish or Spanish Creole, this triggers the safe harbor threshold for translation of vital documents.

Table 6 Limited English Proficient Persons by Language in North Carolina, 2018

Rank	Language Spoken	Population	
		Number	Percentage of Total Population
Edgecombe County			
1	Spanish or Spanish Creole	991	1.8%
2	Vietnamese	11	0.0%
Nash County			
1	Spanish or Spanish Creole	2,172	2.3%
2	Arabic	116	0.1%
3	German	63	0.1%
4	Other Indic Languages	59	0.1%
5	Russian	54	0.1%
6	French (incl. Patois, Cajun)	19	0.0%
7	Chinese	19	0.0%

Rank	Language Spoken	Population	
		Number	Percentage of Total Population
8	Vietnamese	16	0.0%
9	Japanese	15	0.0%
10	Tagalog	2	0.0%
Rocky Mount			
1	Spanish or Spanish Creole	793	1.4%
2	Arabic	108	0.2%
3	German	42	0.1%
4	Other Indic Languages	24	0.0%
5	Chinese	19	0.0%
6	Japanese	15	0.0%
7	French (incl. Patois, Cajun)	14	0.0%
8	Vietnamese	11	0.0%
9	Russian	8	0.0%
10	French Creole	0	0.0%

Source: 2011-2015 American Community Survey: S16001

Note: The American Community Survey has not released any updated data tables for persons with Limited English Proficiency for Edgecombe, Nash and Rocky Mount since the 2011-2015 ACS.

Disability

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to engage in activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional disability, provided “reasonable accommodation” can be made. This may include changes to address the needs of persons with disabilities, such as adaptive structural changes (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In 2018, North Carolina’s disability rate was 13.3% with the elderly more likely to have a disability than any other age group.

The Rocky Mount region has a higher prevalence rate than the State at approximately 16% of the population with one or more disabilities with the highest rates for ambulatory and independent living difficulties. Elderly persons are more likely to have an ambulatory difficulty and persons aged 18-64 are more likely to have an independent living difficulty.

Table 7 Disability Type by Age, 2018

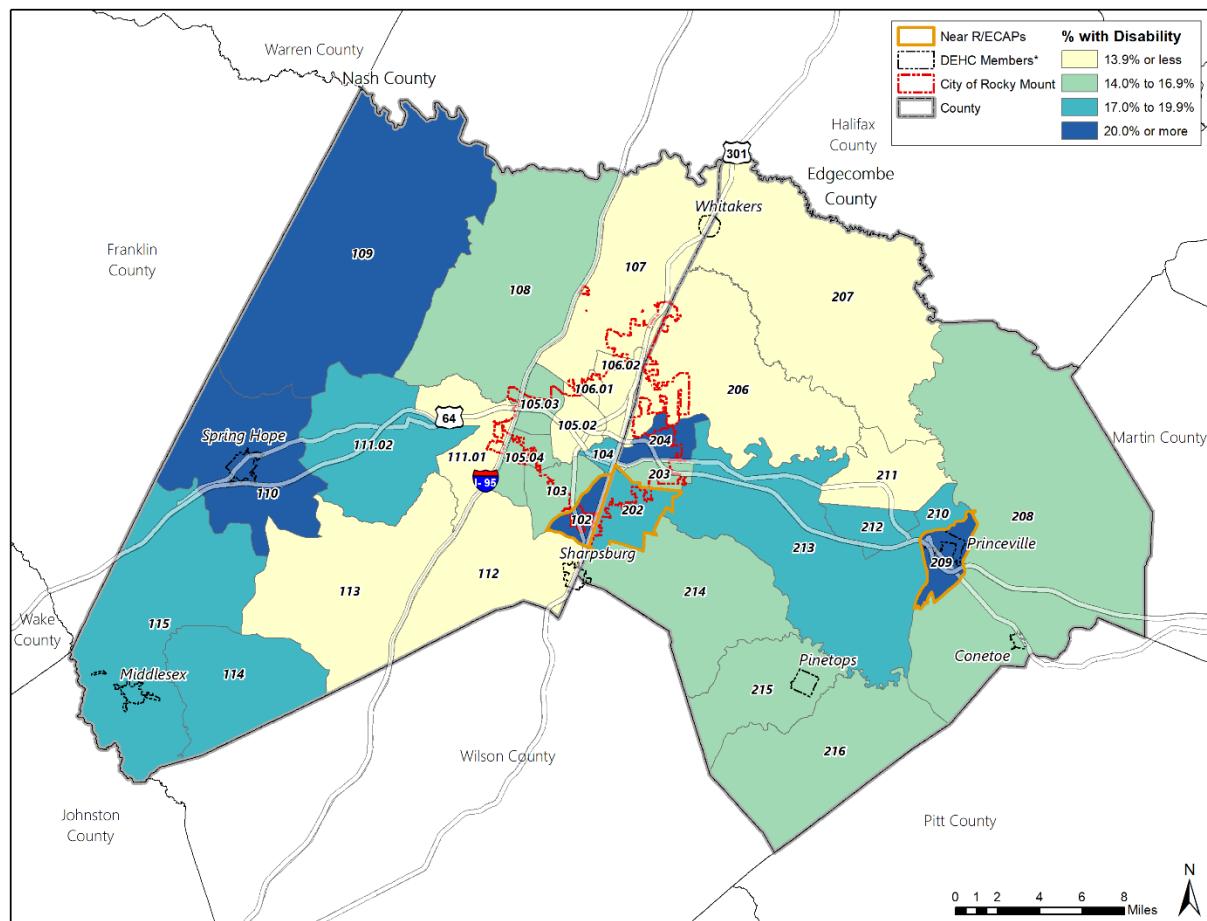
	Edgecombe County		Nash County		Rocky Mount	
	Number	Percent	Number	Percent	Number	Percent
Total population	53,332	100%	94,003	100%	54,982	100%
With one or more disabilities	8,854	16.6%	15,142	16.1%	8,503	15.5%
Hearing difficulty	1,788	3.4%	3,861	4.1%	1,795	3.3%
Ages 0-17	28	0.1%	228	0.2%	86	0.2%
Ages 18-64	680	1.3%	1,081	1.1%	643	1.2%
Ages 65 and over	1,080	2.0%	2,552	2.7%	1,066	1.9%
Vision difficulty	1,214	2.3%	3,012	3.2%	1,454	2.6%
Ages 0-17	93	0.2%	159	0.2%	87	0.2%
Ages 18-64	570	1.1%	1,858	2.0%	930	1.7%
Ages 65 and over	551	1.0%	995	1.1%	437	0.8%
Cognitive difficulty	3,620	6.8%	4,594	4.9%	3,221	5.9%
Ages 0-17	276	0.5%	775	0.8%	444	0.8%
Ages 18-64	2,179	4.1%	2,361	2.5%	1,908	3.5%
Ages 65 and over	1,165	2.2%	1,458	1.6%	869	1.6%
Ambulatory difficulty	5,043	9.5%	8,788	9.3%	4,758	8.7%
Ages 0-17	31	0.1%	96	0.1%	52	0.1%
Ages 18-64	2,489	4.7%	4,087	4.3%	2,248	4.1%
Ages 65 and over	2,523	4.7%	4,605	4.9%	2,458	4.5%
Self-care difficulty	1,681	3.2%	2,900	3.1%	1,514	2.8%
Ages 0-17	69	0.1%	183	0.2%	61	0.1%
Ages 18-64	763	1.4%	1,469	1.6%	853	1.6%
Ages 65 and over	849	1.6%	1,248	1.3%	600	1.1%

	Edgecombe County		Nash County		Rocky Mount	
	Number	Percent	Number	Percent	Number	Percent
Independent living difficulty	3,457	6.5%	5,333	5.7%	3,277	6.0%
Ages 18-64	1,897	3.6%	2,727	2.9%	2,011	3.7%
Ages 65 and over	1,560	2.9%	2,606	2.8%	1,266	2.3%

Source: 2014-2018 American Community Survey: S0101

Persons with disabilities are concentrated in the eastern sections of Rocky Mount, northwestern Nash County including Spring Hope, and the Tarboro/Princeville area. Southeastern Rocky Mount and Tarboro/Princeville are Near R/ECAPs.

Map 6 Population with a Disability, 2018



Among the civilian noninstitutionalized population between the ages of 18 and 64, there are significant differences in labor force participation rates among those with and without a disability. Labor force participation rates among those with one or more disabilities ranged from 26.0% in Edgecombe County to 40% in Nash County while labor force participation rates among those without a disability ranged from 79.0% in Edgecombe County to 82.5% in Nash County. Among those participating in the labor force, approximately 10-11% of persons with disabilities are unemployed compared to approximately 6-8% of those without a disability.

Table 8 Employment and Labor Force Participation by Disability Status, 2018

	Edgecombe County		Nash County		Rocky Mount	
	Number	Percent	Number	Percent	Number	Percent
Civilian noninstitutionalized population age 18 to 64	30,992	100%	55,829	100%	32,483	100%
No disability	26,098	84.2%	48,403	86.7%	27,928	86.0%
In labor force	20,616	79.0%	39,936	82.5%	22,543	80.7%
Employed	18,983	92.1%	37,574	94.1%	20,682	91.7%
Unemployed	1,633	7.9%	2,362	5.9%	1,861	8.3%
Not in labor force	5,482	21.0%	8,467	17.5%	5,385	19.3%
With one or more disabilities	4,894	15.8%	7,426	13.3%	4,555	14.0%
In labor force	1,274	26.0%	2,969	40.0%	1,455	31.9%
Employed	1,132	88.9%	2,654	89.4%	1,296	89.1%
Unemployed	142	11.1%	315	10.6%	159	10.9%
Not in labor force	3,620	74.0%	4,457	60.0%	3,100	68.1%

Source: 2014-2018 American Community Survey: C18120

According to the National Organization on Disabilities, a significant income gap exists for people with disabilities given their lower rate of employment. Among persons age 16 and older with earnings, the poverty rate is significantly higher for those with disabilities than those without. Throughout the Rocky Mount region, poverty rates among those with a disability are ten to eleven percentage points higher than the poverty rate among those without a disability.

In Rocky Mount, the median earnings among persons with disabilities was equivalent to 63% of the median earnings of \$26,875 for persons without disabilities. Nash County is slightly higher at 74% while Edgecombe County comes closest to parity at 93%. Even in the absence of discrimination, people with disabilities often experience greater obstacles in securing affordable housing that is accessible due to the higher potential for lower wages and rates of employment.

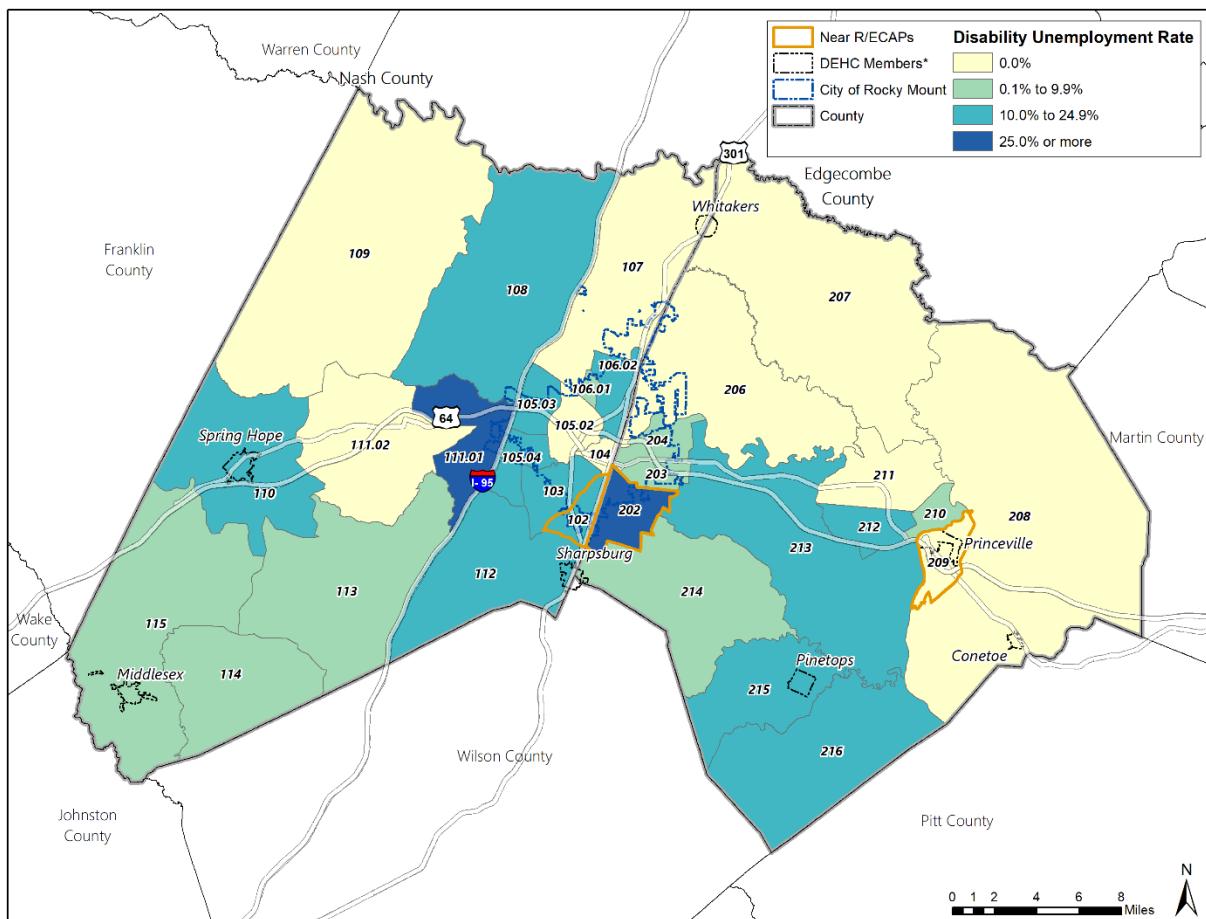
Table 9 Median Earnings and Poverty Rates by Disability Status Among Civilian Noninstitutionalized Population Age 16 and Older with Earnings, 2018

Population	Edgecombe County		Nash County		Rocky Mount	
	Median Annual Earnings	Poverty Rate	Median Annual Earnings	Poverty Rate	Median Annual Earnings	Poverty Rate
Civilian noninstitutionalized population age 16 and over with earnings	\$26,029	20.3%	\$28,551	13.5%	\$26,349	17.9%
With a disability	\$24,301	28.5%	\$21,691	21.8%	\$16,797	27.0%
Without a disability	\$26,088	18.2%	\$29,392	11.5%	\$26,875	15.8%

Source: 2014-2018 American Community Survey: S1811

Areas in which persons with disabilities have higher rates of unemployment is generally in the southern half of the Rocky Mount region, with high concentrations in Nash County just west of Rocky Mount (but outside of the DEHC communities) and in southeastern Rocky Mount in the Near R/ECAP.

Map 7 Unemployment Rate of Persons with at Least One Disability, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2014-2018 American Community Survey: C18120

Household Type

The Census Bureau defines households as either family or non-family. Family households are married couples with or without children, single parents with children, and other families comprised of related persons. Non-family households are either single persons living alone or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

Family households comprised the majority of the region's households at 53.9% in 2018. This is a slight increase from 2015 when family households comprised 52.4% of all households.

Both Nash and Edgecombe Counties (as well as Rocky Mount) saw increases in the number of households with children; Edgecombe County had the largest increase at 5.2%. Nash County and Rocky Mount experienced decreases in the number of households without children.

Table 10 Household Type and Presence of Children, 2015-2018

Household Type	2015	2018	Change 2015-2018	
			Number	Percent
Edgecombe County				
Family Households	14,198	14,454	256	1.8%
Married Couple Families	8,107	8,130	23	0.3%
With children	2,821	2,638	-183	-6.5%
Without children	5,286	5,492	206	3.9%
Other family households	6,091	6,324	233	3.8%
Male householder	958	1,247	289	30.2%
With children	438	601	163	37.2%
Without children	520	646	126	24.2%
Female householder	5,133	5,077	-56	-1.1%
With children	3,260	3,611	351	10.8%
Without children	1,873	1,466	-407	-21.7%
Nonfamily households (including living alone)	6,828	6,917	89	1.3%
Male householder	3,073	3,058	-15	-0.5%
With children	49	71	22	44.9%
Without children	3,024	2,987	-37	-1.2%
Female householder	3,755	3,859	104	2.8%
With children	21	9	-12	-57.1%
Without children	3,734	3,850	116	3.1%
Nash County				
Family Households	23,890	24,306	416	1.7%
Married Couple Families	16,215	16,808	593	3.7%
With children	6,020	6,447	427	7.1%
Without children	10,195	10,361	166	1.6%

Household Type	2015	2018	Change 2015-2018	
			Number	Percent
Other family households	7,675	7,498	-177	-2.3%
Male householder	1,691	1,801	110	6.5%
With children	991	1,005	14	1.4%
Without children	700	796	96	13.7%
Female householder	5,984	5,697	-287	-4.8%
With children	4,089	3,660	-429	-10.5%
Without children	1,895	2,037	142	7.5%
Nonfamily households (including living alone)	12,821	12,414	-407	-3.2%
Male householder	5,480	5,375	-105	-1.9%
With children	90	141	51	56.7%
Without children	5,390	5,234	-156	-2.9%
Female householder	7,341	7,039	-302	-4.1%
With children	73	64	-9	-12.3%
Without children	7,268	6,975	-293	-4.0%
Rocky Mount				
Family Households	13,844	14,063	219	1.6%
Married Couple Families	7,527	7,700	173	2.3%
With children	2,618	2,809	191	7.3%
Without children	4,909	4,891	-18	-0.4%
Other family households	6,317	6,363	46	0.7%
Male householder	985	1,296	311	31.6%
With children	566	668	102	18.0%
Without children	419	628	209	49.9%
Female householder	5,332	5,067	-265	-5.0%
With children	3,798	3,581	-217	-5.7%
Without children	1,534	1,486	-48	-3.1%
Nonfamily households (including living alone)	8,439	7,905	-534	-6.3%
Male householder	3,606	3,147	-459	-12.7%
With children	69	77	8	11.6%
Without children	3,537	3,070	-467	-13.2%
Female householder	4,833	4,758	-75	-1.6%
With children	73	64	-9	-12.3%

Source: 2014-2018 American Community Survey (B11005)

Female-headed households with children often experience difficulty in obtaining housing as a result of lower incomes and higher expenses such as childcare. In 2018, 56.0% of Edgecombe County's female-headed households with children were living below poverty as compared to 4.1% of single male-headed households and 6.3% of married couples. In Nash County, 52.5% of female-headed households with children were living below poverty as compared to 5.9% of single male-headed households and 13.2% of married couples. This pattern persists in Rocky Mount; 66.6% of female-headed households with children were living below poverty as compared to 1.9% of single male-headed households and 3.0% of married couples.

Table 11 Poverty Rate by Family Household Type and Presence of Children

	Households Below Poverty Level	
	Number	Percentage of all Households Below Poverty
Edgecombe County		
Married Couple Families	520	18.7%
With children	177	6.3%
Without children	343	12.3%
Male householder	291	10.4%
With children	115	4.1%
Without children	176	6.3%
Female householder	1,977	70.9%
With children	1,561	56.0%
Without children	416	14.9%
Nash County		
Married Couple Families	657	23.4%
With children	369	13.2%
Without children	288	10.3%
Male householder	281	10.0%
With children	165	5.9%
Without children	116	4.1%
Female householder	1,868	66.6%
With children	1,473	52.5%
Without children	395	14.1%
Rocky Mount		
Married Couple Families	225	9.3%
With children	74	3.0%
Without children	151	6.2%
Male householder	173	7.1%
With children	45	1.9%
Without children	128	5.3%
Female householder	2,030	83.6%
With children	1,617	66.6%
Without children	413	17.0%

Source: 2014-2018 American Community Survey (B17023)

Income, Unemployment and Poverty

Household income is strongly related to housing choice, as household income is one of several factors used to determine eligibility for a home mortgage loan or rental lease. Employment greatly influences an individual's poverty status and housing choice. Lower earnings due to unemployment and income disparities limit a household's ability to afford housing.

The following graph and table are limited to white, Black and Hispanic persons because the data was not reliable for other racial groups for one or both years in the analysis.

The 2018 median household income was highest in Nash County at \$48,362 and lowest in Edgecombe County at \$35,516. When adjusted for inflation, changes in real household income have varied by race/ethnicity. In Nash County, Black and Hispanic households saw increases in median household income by over 20% from 2015 to 2018 while household incomes in Edgecombe County had small increases ranging from 0.8% among white households to 6.6% for Hispanic households. Rocky Mount, comprised of parts of both counties had stagnant wages for white households and larger increases for Black and Hispanic households at 15.7% and 35.8%, respectively.

Table 12 Median Household Income by Race/Ethnicity, 2015-2018 (adjusted to 2018 dollars)

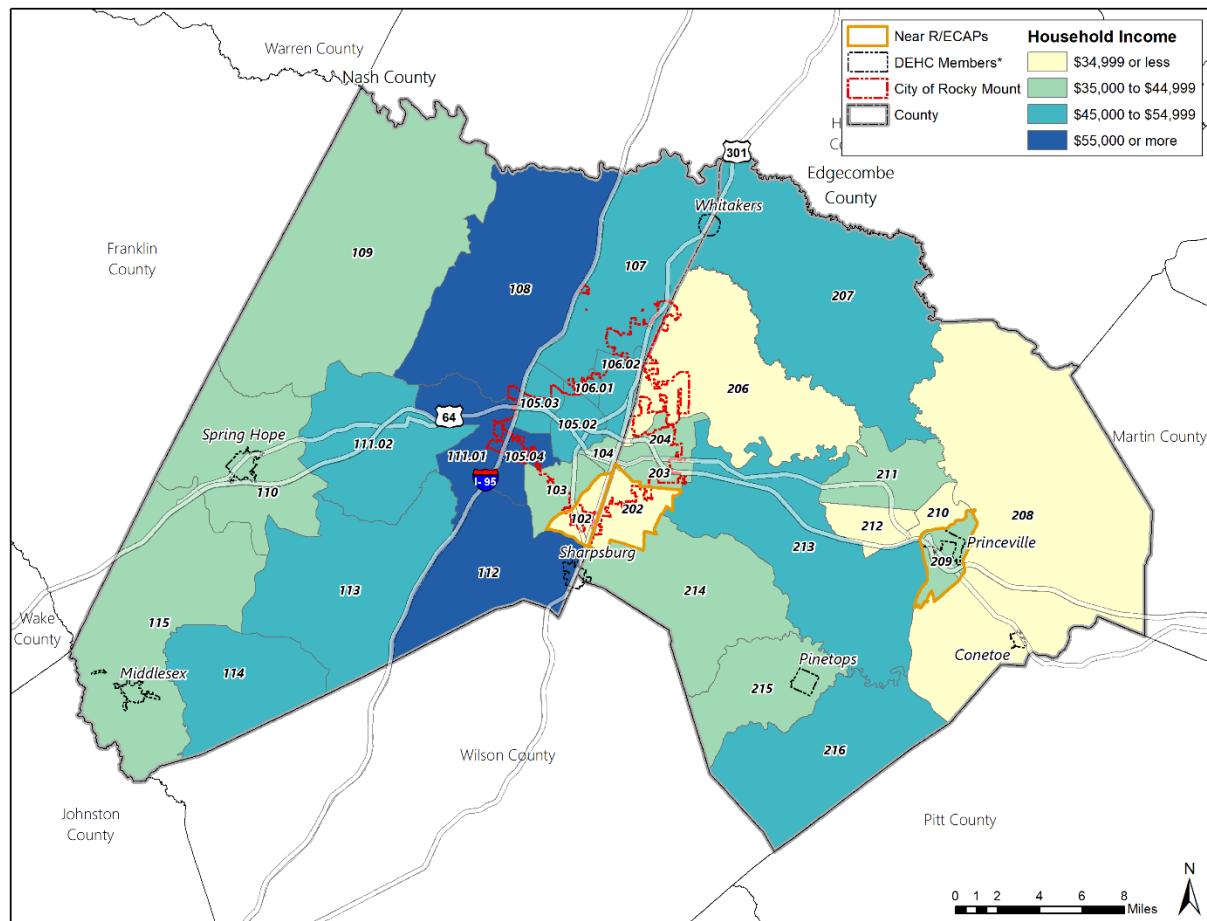
	2010	2015	2018	Percent Change 2015-2018
Edgecombe County				
White, non-Hispanic	\$ 49,136	\$ 43,141	\$ 43,500	0.8%
Black, non-Hispanic	\$ 29,682	\$ 30,126	\$ 30,780	2.2%
Hispanic, any race	\$ 29,729	\$ 29,058	\$ 30,974	6.6%
Median, all races/ethnicity	\$ 37,238	\$ 34,619	\$ 35,516	2.6%
Nash County				
White, non-Hispanic	\$ 59,213	\$ 55,057	\$ 58,521	6.3%
Black, non-Hispanic	\$ 39,366	\$ 33,106	\$ 39,814	20.3%
Hispanic, any race	\$ 49,600	\$ 36,944	\$ 45,187	22.3%
Median, all races/ethnicity	\$ 50,729	\$ 45,276	\$ 48,362	6.8%
Rocky Mount				
White, non-Hispanic	\$ 59,652	\$ 53,379	\$ 53,406	0.0%
Black, non-Hispanic	\$ 35,022	\$ 31,270	\$ 36,175	15.7%
Hispanic, any race	\$ 44,175	\$ 28,079	\$ 38,125	35.8%
Median, all races/ethnicity	\$ 42,247	\$ 38,253	\$ 40,665	6.3%

Source: American Community Survey 2014-2018 (S1903)

Note: The percent change in median household income was calculated for the time period since the last AI was completed. The 2010 values are provided for reference.

Median household income varies geographically across the region. Incomes are generally higher in Nash County and lower in Edgecombe County and Rocky Mount. The eastern portions of Rocky Mount and the eastern side of Edgecombe County tend to have the lowest median household incomes at less than \$35,000 annually.

Map 8 Median Household Income, 2018



The 2018 statewide unemployment rate was 6.3%; the unemployment rate among the population age 20 to 64 ranged from a low of 5.8% in Nash County to a high of 7.9% in Rocky Mount. Among many data points included in the AI, Rocky Mount's values have been between those of Edgecombe and Nash Counties, which is reasonable given that Rocky Mount straddles the boundaries of the two counties. However, with respect to the unemployment rate, ***Rocky Mount has the highest unemployment rate suggesting that, overall, residents residing in the Rocky Mount portions of the counties are disproportionately impacted by unemployment.***

Across the region, white persons participate in the labor force at rates that are lower than their Black and Hispanic counterparts.

Across the region, males have higher unemployment rates than females, including females with children. *Males also participate in the labor force at higher rates than women in the aggregate but at lower rates than women with children. Females with children participate in the labor force at rates higher than females in the aggregate and are less likely to be unemployed.*

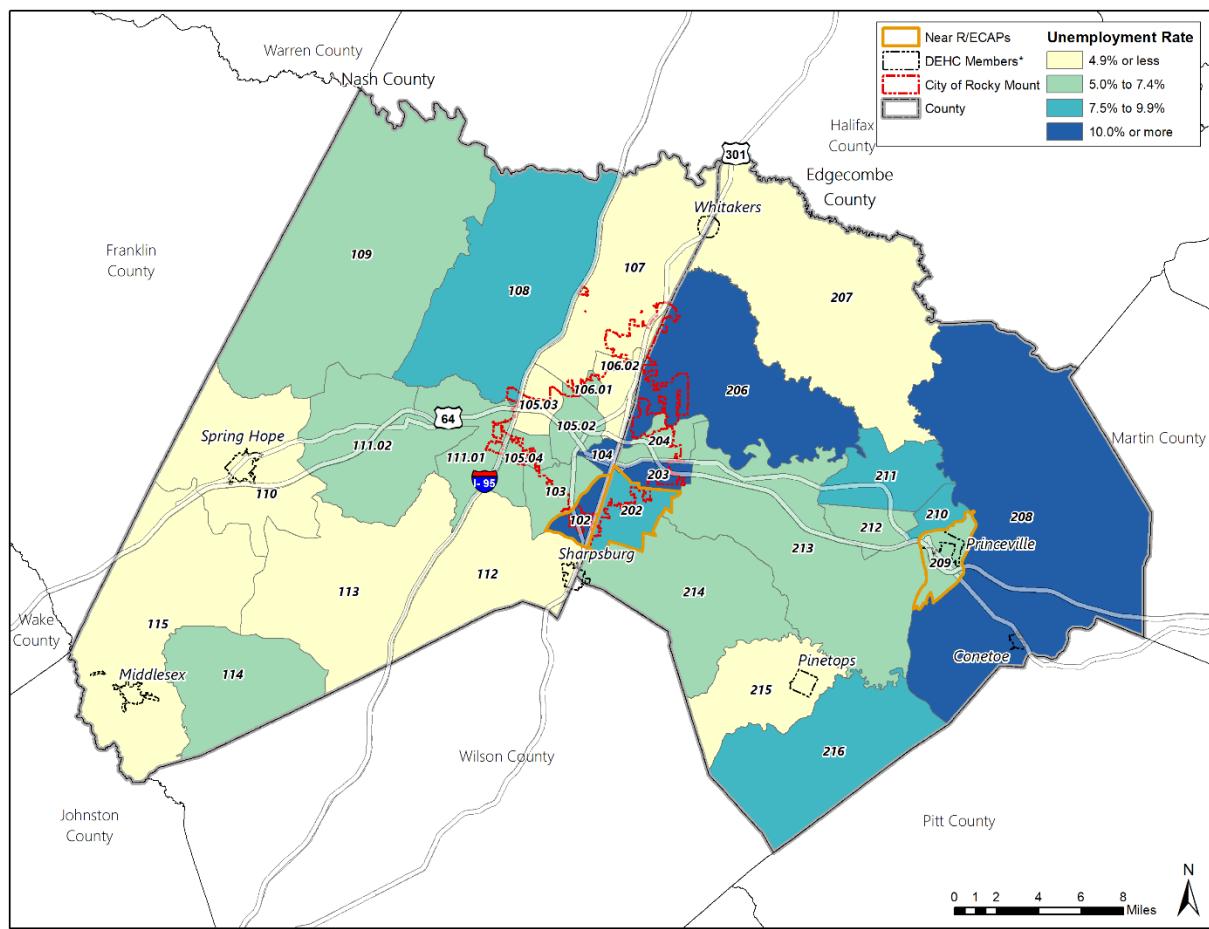
Persons with one or more disabilities are less likely to participate in the labor force and when they do are more likely to be unemployed than those without a disability

Table 13 Labor Force Participation and Unemployment Rates, 2018

	Edgecombe County		Nash County		Rocky Mount	
	Labor Force Participation Rate	Unemployment Rate	Labor Force Participation Rate	Unemployment Rate	Labor Force Participation Rate	Unemployment Rate
Population 20 to 64 years	70.6	7.6	76.5	5.8	74.8	7.9
Race/Ethnicity						
White alone, non-Hispanic	54.4	5.4	59.6	4.3	57.3	5.4
Black alone	56	9.8	62	8.4	60.8	9.9
Hispanic	60.8	6.4	75.5	6.2	68.3	4.2
Sex						
Male	73.4	9.9	78.6	6.9	76.2	10.4
Female	68.3	5.5	74.5	4.7	73.7	5.7
With own children under 18 years	77.3	5	80.6	3.8	81.4	4.4
Disability Status						
With any disability	26	10.7	39.8	10.8	32	11.1

Source: American Community Survey 2014-2018 (S2301)

Map 9 Unemployment Rate, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2014-2018 American Community Survey: S2301

Across the region, poverty rates are highest among those under 18 years of age and lowest among those who are 65 and older. Despite having lower unemployment rate, women are more likely than men to be living below the poverty level.

In Rocky Mount, Black persons are nearly three times as likely to be living below the poverty rate than their white counterparts and only slightly more likely to be living below poverty than Hispanic persons. This pattern of Blacks having higher rates of poverty than whites and Hispanic persons persists throughout the region.

Geographically, unemployment rates and poverty rates track follow the same pattern: areas in eastern Edgecombe County and Rocky Mount tend to have higher rates of unemployment and poverty.

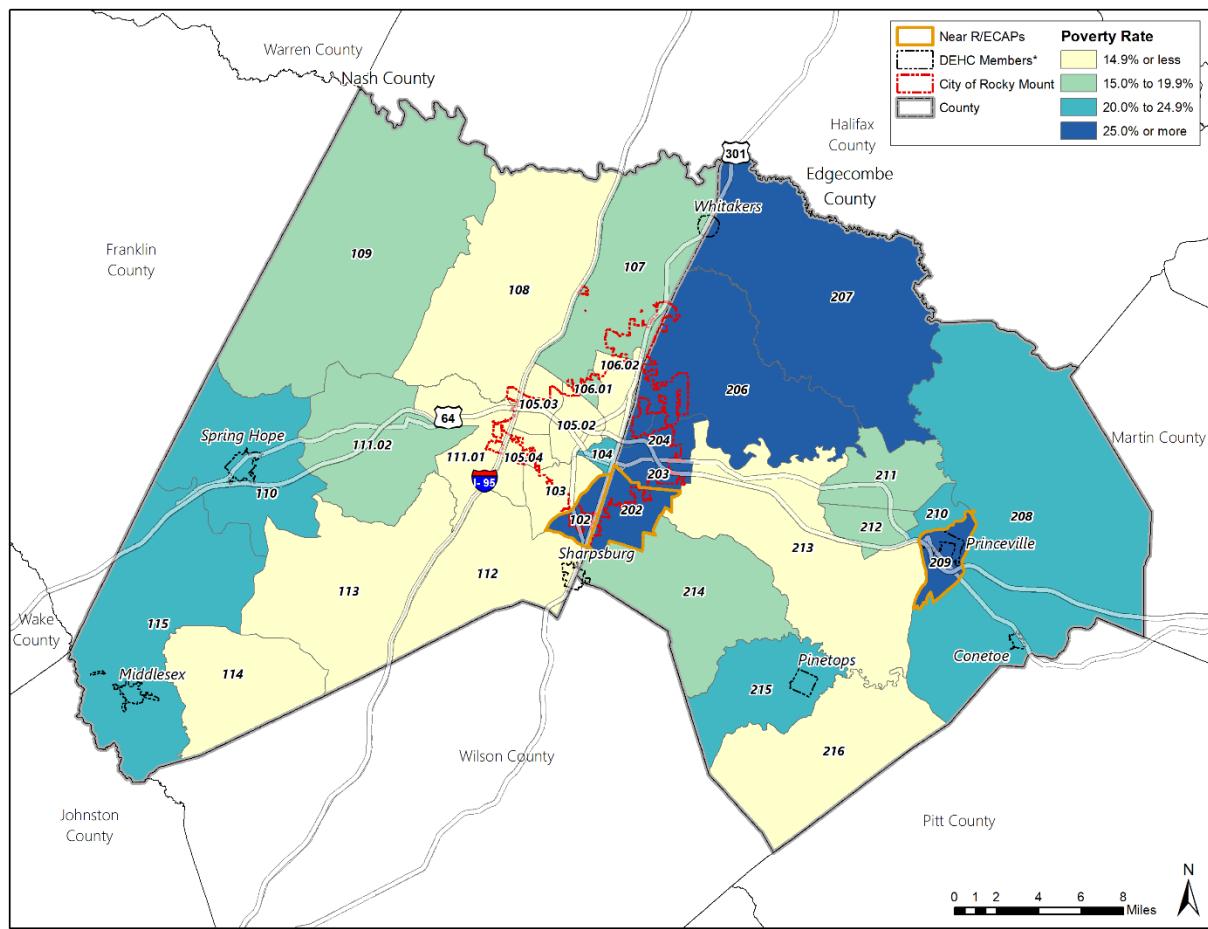
Table 14 Poverty Rates by Age, Sex and Race/Ethnicity, 2018

	Edgecombe County		Nash County		Rocky Mount	
	Number	Percentage	Number	Percentage	Number	Percentage
Total Population Below Poverty	12,423	23.6%	14,269	15.5%	11,310	21.0%
Age						
Under 18 years	4,257	35.4%	4,633	22.3%	3,982	30.7%
18 to 64 years	6,850	22.1%	7,645	13.8%	6,238	19.5%
65 years and over	1,316	13.8%	1,991	12.5%	1,090	12.3%
Sex						
Male	5,272	21.5%	5,709	13.0%	4,314	17.7%
Female	7,151	25.5%	8,560	17.8%	6,996	23.7%
Race/Ethnicity*						
White alone, non-Hispanic	2,493	13.1%	4,395	9.4%	1,341	8.9%
Black or African American alone	9,278	30.7%	7,673	21.4%	9,019	26.1%
Hispanic or Latino origin (of any race)	467	19.9%	1,484	23.6%	470	24.4%

Source: 2006-2010 & 2014-2018 American Community Survey: S1701

*Note: The values do not add to the total number of persons living below the poverty level because some races were omitted from the analysis because the sample size was too small to be reliable.

Map 10 Poverty Rate, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2018 American Community Survey: S1701

Housing Profile

Key Findings

- North Carolina's housing stock is relatively modern with the median year of homes built of 1988; the Rocky Mount region has slightly older housing stock.
- Homeowner vacancy rates in the Rocky Mount region are 2.4%, 2.1% and 3.4% for Edgecombe County, Nash County and Rocky Mount, respectively.
- Rental vacancy rates are higher than homeowner vacancy rates at 6.0%, 5.6% and 7.6% in Edgecombe County, Nash County and Rocky Mount, respectively.
- Homeownership rates are 59% in Edgecombe County, 64% in Nash County and 51% in Rocky Mount. However, there are variations in homeownership rates by racial/ethnic group.
- From 2015-2018, median home values have either declined slightly or remained the same when adjusted for inflation. Median gross rents have remained the same over time while median contract rent has increased slightly.
- Across the region, renters are more likely to be cost burdened than homeowners. Black renters are cost burdened at higher rates than white renters with Hispanic renters not following any particular pattern. These patterns persist among homeowners.

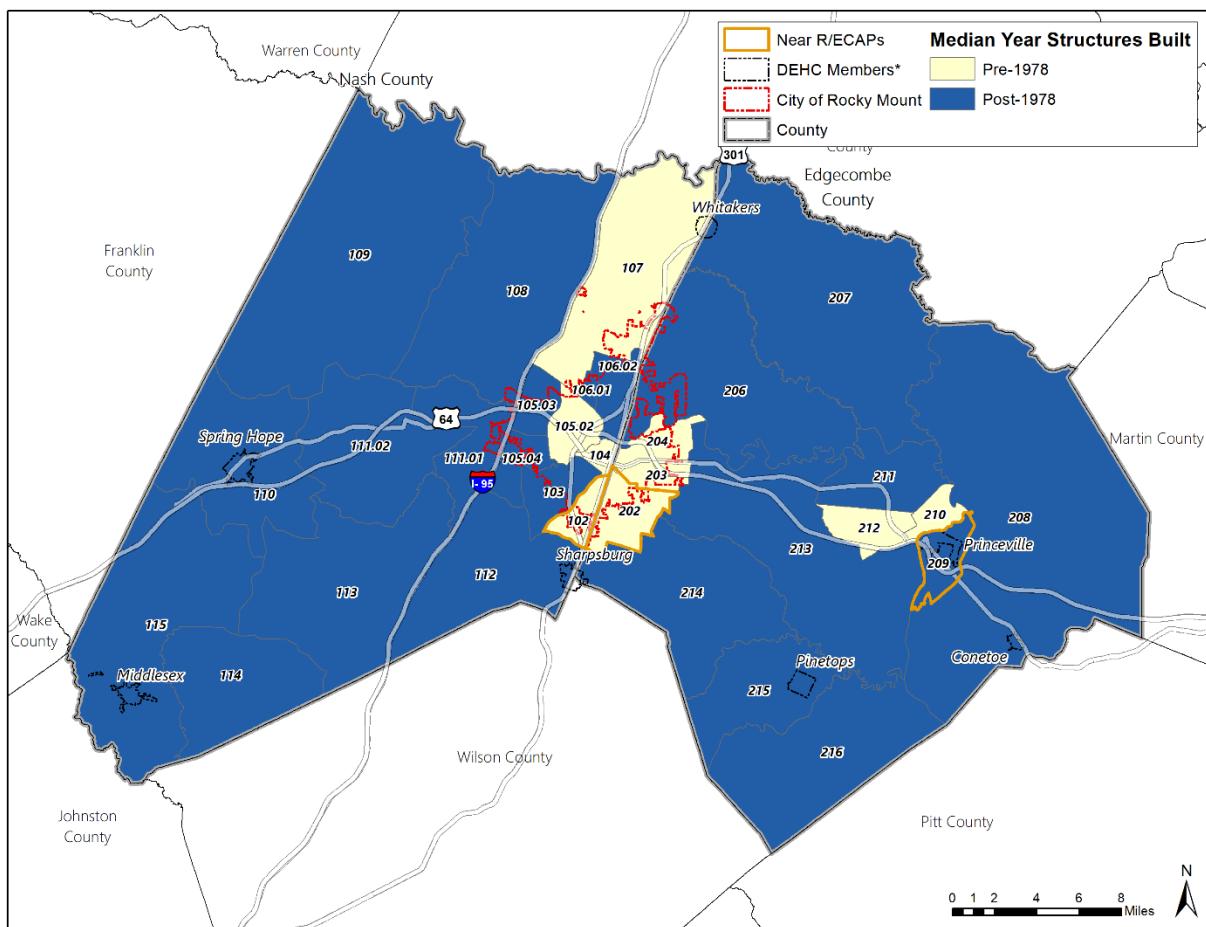
Age of Housing Stock

Older homes typically need mechanical system and energy efficiency upgrades, which may not be financially feasible, particularly among low- and moderate-income households. High energy costs can contribute to cost burden. For persons with health conditions such as asthma, features such as excessive moisture and dampness, inadequate or poorly maintained heating and ventilation systems and structural defects are associated with exposure to indoor asthma triggers.

Another significant concern is the presence of lead-based paint. In 1978, the federal government banned the use of lead-based paint in homes after studies showed that lead caused severe health problems, particularly among children under the age of six. The nervous systems of children could even be damaged before birth. Although lead-based paint is no longer on the market, many older homes still have lead-based paint on the walls and trim. Scraping paint and sanding old paint can release dust containing lead that, when inhaled, can be harmful.

North Carolina's housing stock is relatively modern with the median year of homes built of 1988; the Rocky Mount region has slightly older housing stock. In Edgecombe County, the median years built of renter- and owner-occupied units were 1977 and 1978, respectively. Nash County is slightly newer; median years built of renter- and owner-occupied units were 1983 and 1898, respectively. The median years built in Rocky Mount were 1979 and 1978 for renter-occupied and owner-occupied units, respectively. Homes are oldest in Rocky Mount and northward toward Whitaker as well as in the Tarboro area.

Map 11 Median Year Structure Built, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2014-2018 American Community Survey: B25035

Vacancy Rates

Vacancy rate data come from the American Community Survey, which defines vacancy rate as the ratio of vacant available units to total units.

Homeowner vacancy rates in the Rocky Mount region are 2.4%, 2.1% and 3.4% for Edgecombe County, Nash County and Rocky Mount, respectively. Homeowner vacancy is the ratio of vacant available for-sale and sold housing units to the total number of vacant and owner-occupied housing units. Homeowner vacancy rates are generally low though there are higher rates of vacancy in Rocky Mount, Tarboro/Princeville area and in northern Edgecombe County.

Like homeowner vacancies, rental vacancies are the ratio of vacant available for-rent and rented unoccupied units to the total number of vacant available and rental-occupied housing units. ***Rental vacancy rates are higher than homeowner vacancy rates at 6.0%, 5.6% and 7.6% in Edgecombe County, Nash County and Rocky Mount, respectively.*** Rental vacancy is considered “healthy” if it is between 5-7%. Using 5% as the benchmark, Nash County is split between having an extremely competitive market and one with excess inventory. Edgecombe County largely has a tight rental market, though there is excess inventory in the Tarboro/Princeville area and along the borders of Pitt and Halifax Counties. Rocky Mount has varying levels of vacancy across the City, with higher rates generally toward the eastern side.

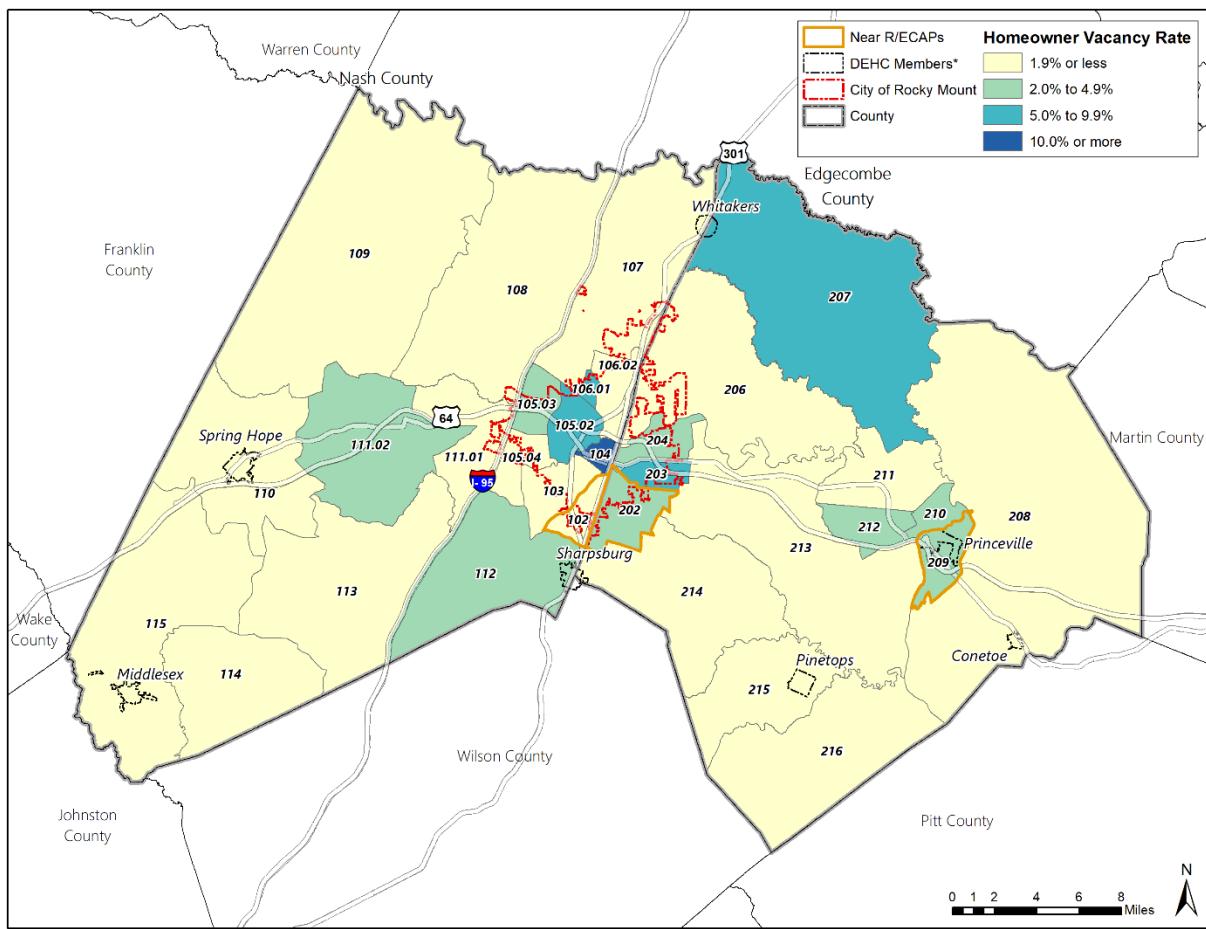
Approximately two-thirds of all vacant units across the region are vacant for reasons other than currently being for rent or sale, rented or sold but not occupied, or as a seasonal home.

Table 15 Vacancy Status by Tenure, 2018

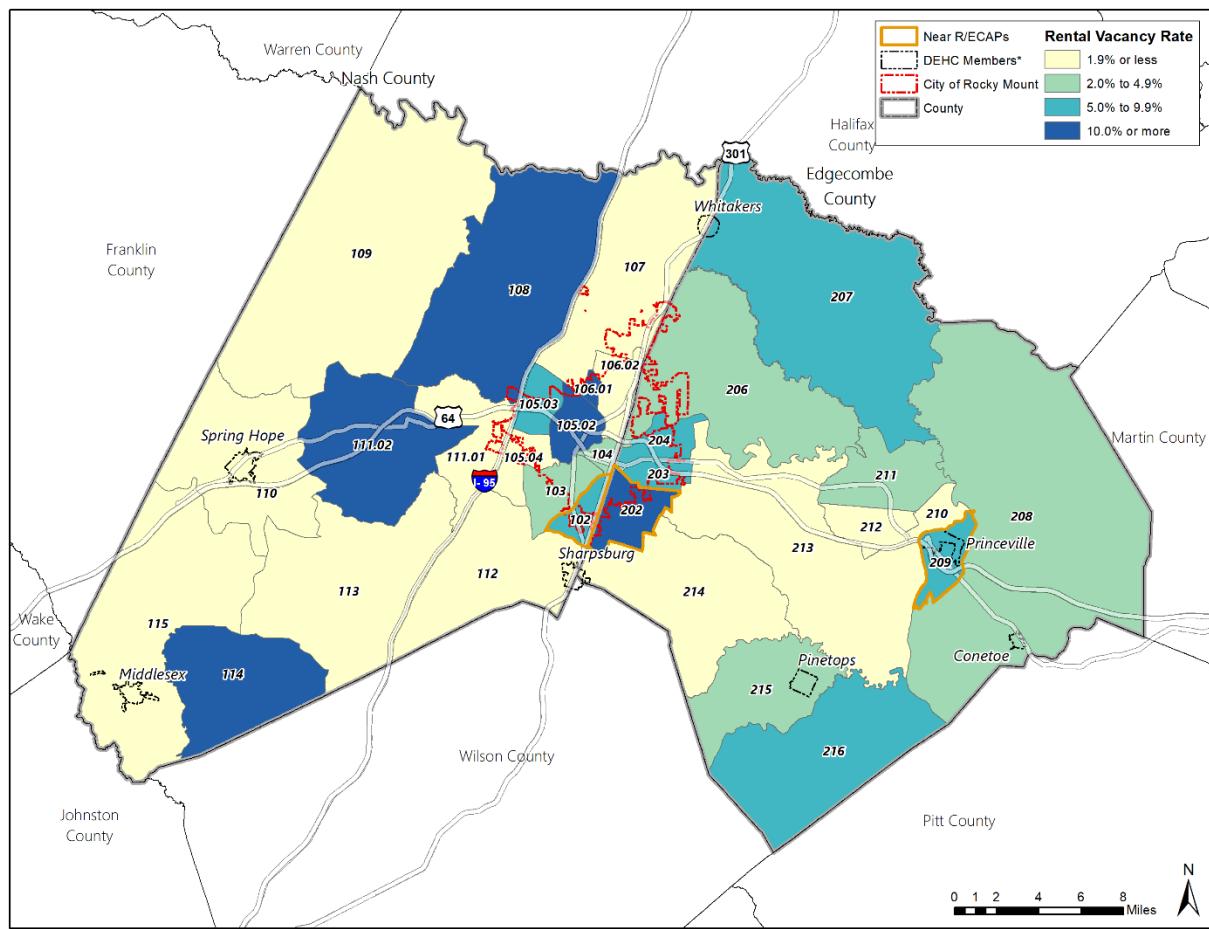
	Edgecombe County		Nash County		Rocky Mount	
	Number	Percentage	Number	Percentage	Number	Percentage
Total Vacant Units	3,574	100%	6,156	100%	4,387	100%
For rent	560	16%	747	12%	873	20%
Rented, not occupied	100	3%	16	0%	55	1%
For sale	316	9%	517	8%	412	9%
Sold, not occupied	82	2%	224	4%	148	3%
For seasonal, recreational, or occasional use	116	3%	287	5%	111	3%
For migrant workers	30	1%	53	1%	0	0%
Other vacant	2,370	66%	4,312	70%	2,788	64%

Source: 2014-2018 American Community Survey: B25004

Map 12 Homeowner Vacancy Rates, 2018



Map 13 Renter Vacancy Rates, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2014-2018 American Community Survey: DP04

Housing Tenure

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."⁴

Homeownership rates are 59% in Edgecombe County, 64% in Nash County and 51% in Rocky Mount. However, there are variations in homeownership rates by racial/ethnic group. The following table indicates the number of percentage of homeowners by race/ethnicity as compared to those races/ethnicities in the population. Across the region, Blacks and Hispanic persons are under-represented among homeowners.

Table 16 Tenure by Race/Ethnicity, 2018

	Homeowners		Population	
	Number	Percentage	Number	Percentage
Edgecombe County*				
Total	12,687	100%	53,332	100%
White, non-Hispanic	6,332	50%	19,394	36%
Black	5,839	46%	30,485	57%
Hispanic	409	3%	2,358	4%
Nash County*				
Total	24,114	100%	94,003	100%
White, non-Hispanic	16,174	67%	47,356	50%
Black	6,788	28%	36,713	39%
Hispanic	710	3%	6,408	7%
Rocky Mount*				
Total	11,394	100%	54,982	100%
White, non-Hispanic	5,175	45%	15,362	28%
Black	5,715	50%	35,168	64%
Hispanic	226	2%	2,004	4%

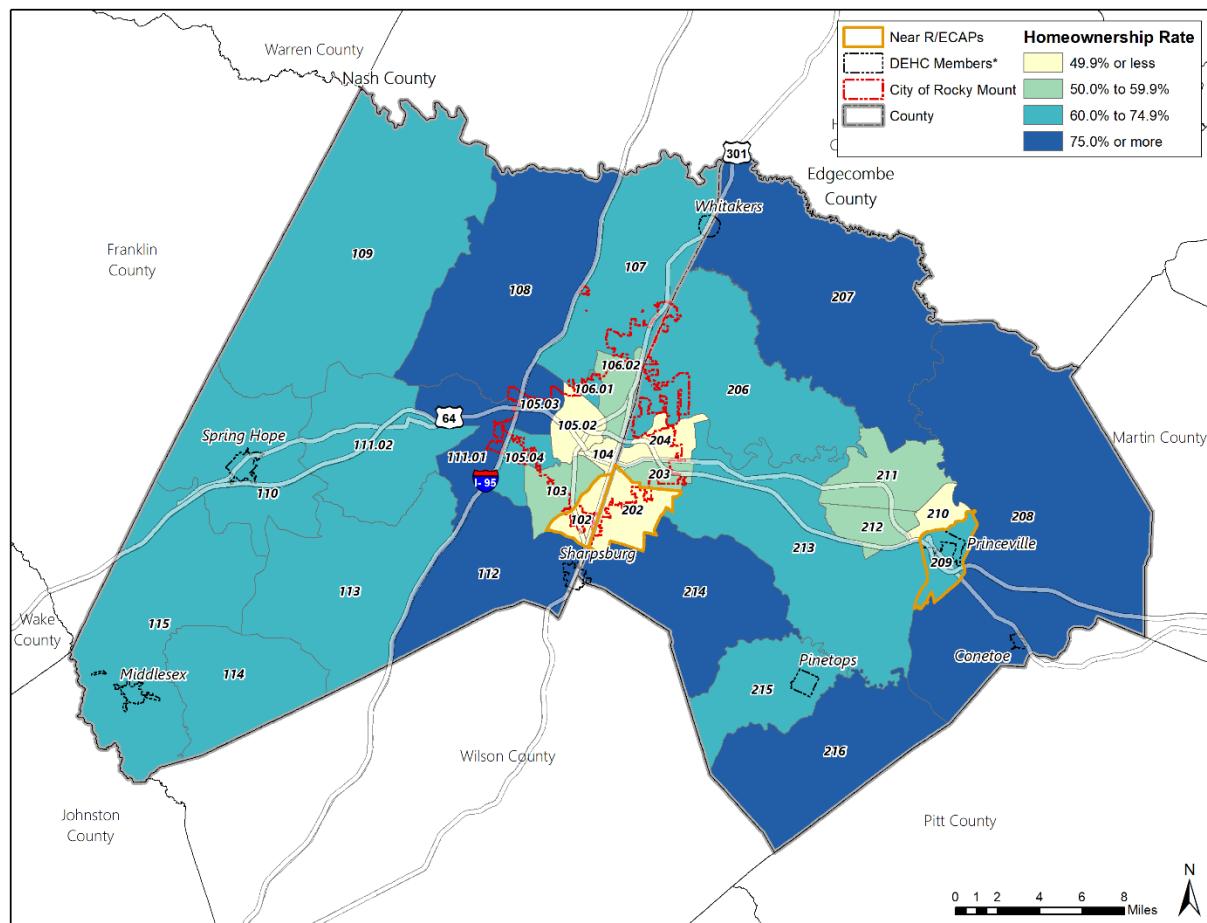
Source: 2014-2018 American Community Survey (B25003, B25003B, B25003H, B25003I, DP05)

*Note that the percentages do not add to 100% because there are some races not counted in this table due to small sample sizes causing unreliable data.

⁴ Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Homeownership rates are generally high in Nash and Edgecombe Counties outside of Rocky Mount. Even in Tarboro/Princeville, a Near R/ECAP, homeownership rates are generally consistent with the balance of Edgecombe County while southeastern Rocky Mount has very low homeownership rates.

Map 14 Homeownership Rates, 2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2014-2018 American Community Survey: B25003

Housing Affordability

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in other areas.

Home values are often used as a proxy for other non-market goods affecting quality of life, such as accessibility to public transit and green space, growth potential in terms of population and development, quality of schools, and more. *From 2015-2018, median home values have either declined slightly or remained the same when adjusted for inflation. Median gross rents have remained the same over time while median contract rent has increased slightly.* The contract rent is the rent listed in the lease – which may or may not include utilities – while gross rent is rent plus utilities.

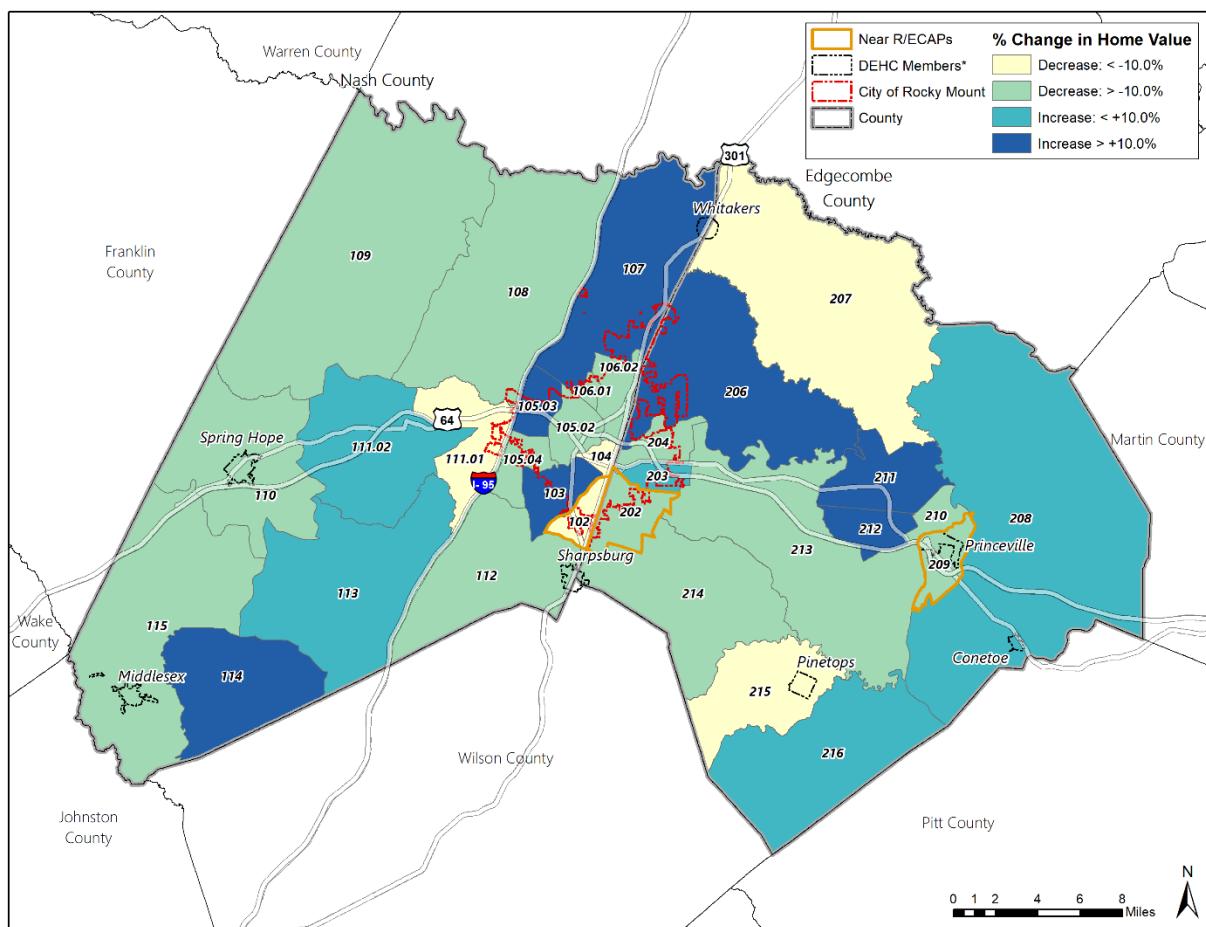
Table 17 Median Gross and Contract Rents and Median Home Values, 2015-2018 (adjusted to 2018 dollars)

	2015	2018	Change 2015-2018	
			Change	Percentage
Edgecombe County				
Median Home Value	87,180	85,200	-1,980	-2%
Median Gross Rent	678	677	-1	0%
Median Contract Rent	444	451	7	1%
Nash County				
Median Home Value	125,786	126,200	414	0%
Median Gross Rent	772	769	-3	0%
Median Contract Rent	525	526	1	0%
Rocky Mount				
Median Home Value	112,422	109,500	-2,922	-3%
Median Gross Rent	785	784	-1	0%
Median Contract Rent	520	528	8	2%

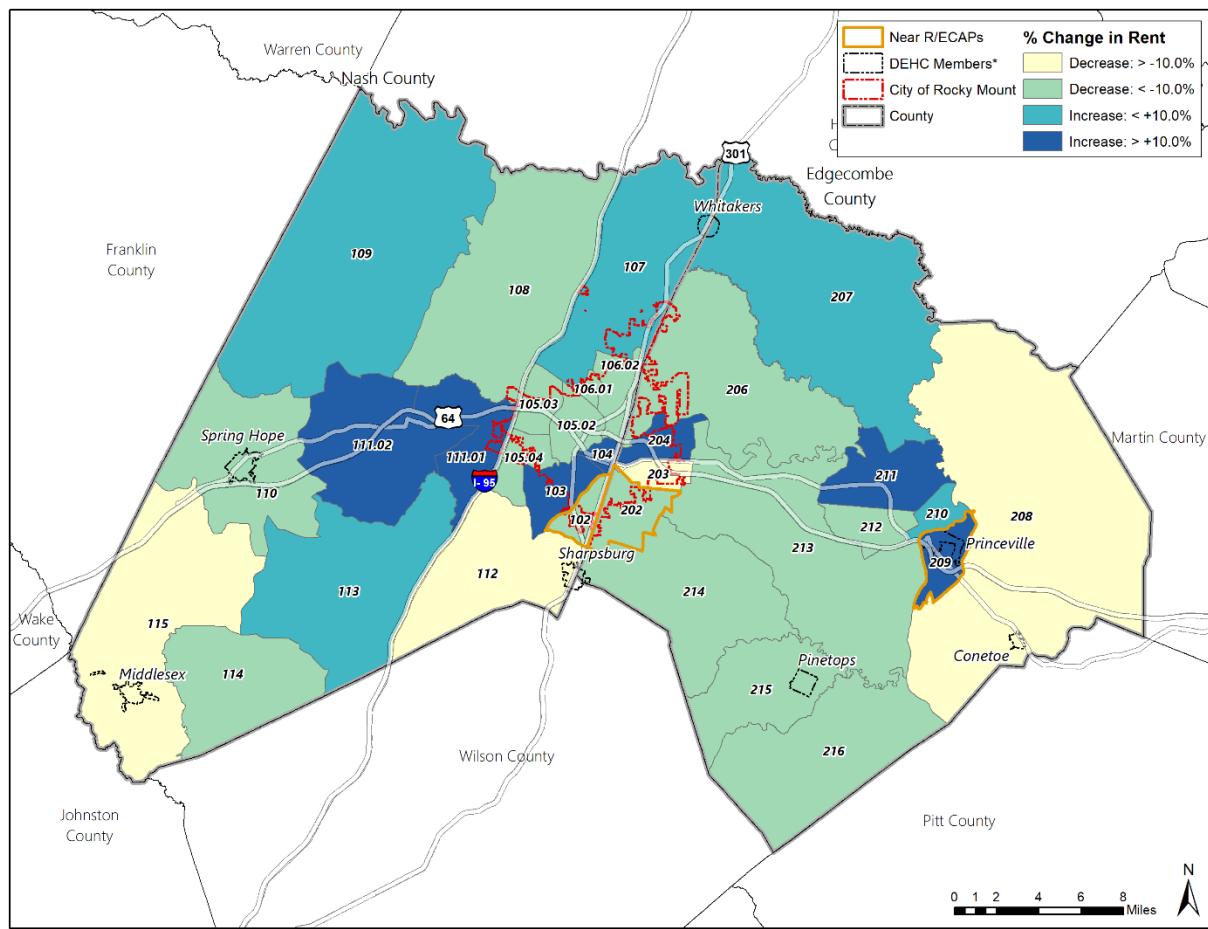
Source: 2011-2015 & 2014-2018 American Community Survey: B25058, B25064, B25077

The following map indicates the change in home value from 2015 to 2018. There is no clear geographic pattern to determine areas in which home values have increased or decreased. Likewise, within the rental market, there are inconsistencies in how well vacancy rate and changes in median gross rent. For example, in the Tarboro/Princeville area, there are higher vacancy rates though median gross rent increased whereas median gross rent decreased in southeastern Rocky Mount where there are higher vacancy rates.

Map 15 Change in Median Housing Value, 2015-2018



Map 16 Change in Median Gross Rent, 2015-2018



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2006-2010 & 2014-2018 American Community Survey: B25064

Cost Burden

Cost burdened households are defined by HUD as households spending more than 30% of their annual income on housing costs. Severely cost burdened households spend more than 50% of their income. Independent from median income, cost burden serves as an indicator of a homeowner's ability to afford property maintenance and improvements. As a household spend an increasing proportion of its income on housing costs, there is less income available for other necessities such as groceries, health care, transportation and childcare.

Across the region, renters are more likely to be cost burdened than homeowners. Black renters are cost burdened at higher rates than white renters with Hispanic renters not following any particular pattern. These patterns persist among homeowners.

Table 18 Cost Burden Status by Race/Ethnicity and Tenure, 2017

	Total Households		Cost Burdened Households			
			Owners		Renters	
	Owners	Renters	Number	Percentage	Number	Percentage
Edgecombe Co						
White, non-Hispanic	6,275	1,930	1,300	21%	685	35%
Black, non-Hispanic	5,950	6,430	2,110	35%	2,800	44%
Hispanic	350	280	30	9%	75	27%
Nash County						
White, non-Hispanic	16,235	4,320	2,850	18%	1,715	40%
Black, non-Hispanic	6,705	7,285	2,270	34%	3,660	50%
Hispanic	750	760	125	17%	230	30%
Rocky Mount						
White, non-Hispanic	5,320	2,015	1,000	19%	890	44%
Black, non-Hispanic	5,385	7,995	1,880	35%	4,255	53%
Hispanic	315	280	50	16%	155	55%

Source: 2013-2017 Comprehensive Housing Affordability Strategy

Other Relevant Data

Communities of Opportunity

A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for minority families, which are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.” Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment. The rationale for this analysis is to help communities determine where to invest housing resources by pinpointing the areas of greatest existing need. However, current evidence suggests that adding more subsidized housing to places that already have a high concentration of social and economic issues (i.e. R/ECAPs) could be counter-productive and not meet the spirit of the goals of HUD programs. This does not mean, however, that R/ECAPs should be ignored by communities. Residents in R/ECAPs still need services and high-quality places to live and stabilizing and improving conditions in the lowest-income neighborhoods remains a key priority for the Rocky Mount region. Rather, investment should be balanced between existing R/ECAPs (improving the quality of life for residents who want to remain in their neighborhoods) and other communities that offer opportunities and advantages for families and individuals.

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. The resulting maps allow communities to analyze opportunity, comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities. The combination of identifying R/ECAPs and Communities of Opportunity creates a holistic approach to community investment.

An Opportunity Index was developed to classify and visualize areas of opportunity for residents of the Rocky Mount region. The Opportunity Index identifies areas in which new affordable housing developments may be more financially feasible in the long-term due to proximity to factors that allow residents to have successful access to employment, quality education, and a healthy environment. The data is linearly normalized to values between 0 and 1, after which census tracts are classified as having High Opportunity if they have a score above the median and Low Opportunity if they have a score below the median. The variables and weight for each index are summarized in the table below, followed by a more detailed description of each index.

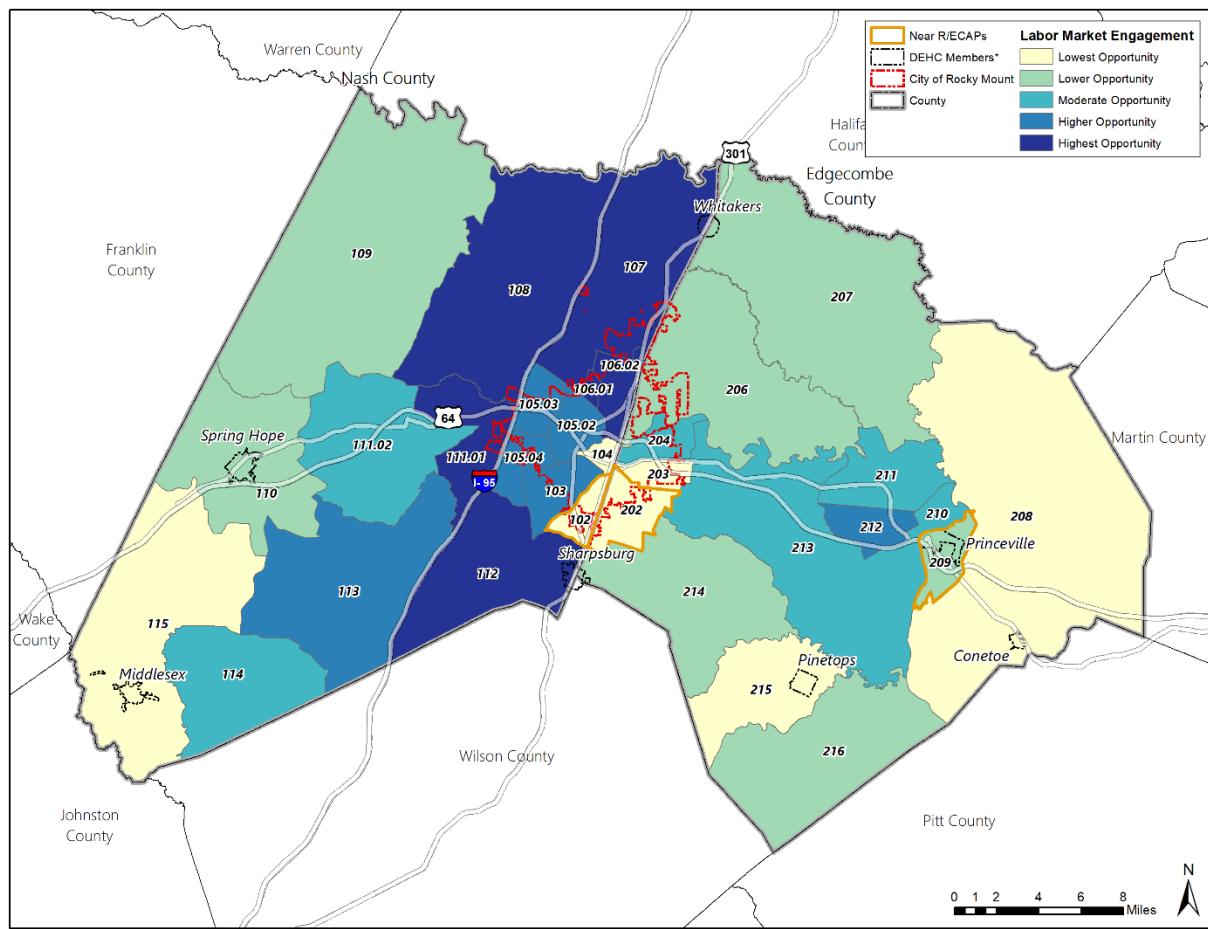
Labor Market Engagement Index

The Labor Market Engagement Index is a measure of the relative intensity of labor market engagement and human capital. The index is a combination of unemployment rates, labor force participation rates, mean commuting time, and percent of the population with at least a bachelor's degree within a census tract. Employment opportunities are necessary for individuals to afford stable housing. Labor force participation represents the amount of labor resources available for the production for goods and services. Mean commuting time indicates ease of access to centers of employment. The percent of the population with at least a bachelor's degree is used to estimate the availability of skilled labor.

Areas with higher levels of labor market engagement are found on the Nash County side of Rocky Mount and its surrounding suburbs. These areas tended to have higher levels of education and wealth, low unemployment rates, and are predominately white. Conversely, the lowest rates are found on the southeastern portion of Rocky Mount and in more rural Nash and Edgecombe Counties. These areas also tend to have higher rates of poverty. However, while southeastern Rocky Mount is predominately Black, the more rural areas are predominately white. The Near R/ECAPs are included in these areas of lower opportunity.

Interestingly, the area including and surrounding Tarboro differs from the expected low levels of labor market engagement. This can be attributed to the Kingsboro Business Park located between Tarboro and Rocky Mount, which provides almost 1,500 acres of industrial space, along with being located near I-64 and local talent from Edgecombe Community College. Major developments include the arrival of Focus Services to create up to 200 jobs through its new operations center, Cargo Transporters' terminal facility that will serve as home-base for 100 transportation trucks, the Triangle Tire plant that is expected to produce six million passenger tires and one million commercial tires annually. Princeville's close proximity to this area may possibly create greater employment opportunities for residents of its Near R/ECAP.

Map 17 Labor Market Engagement Index



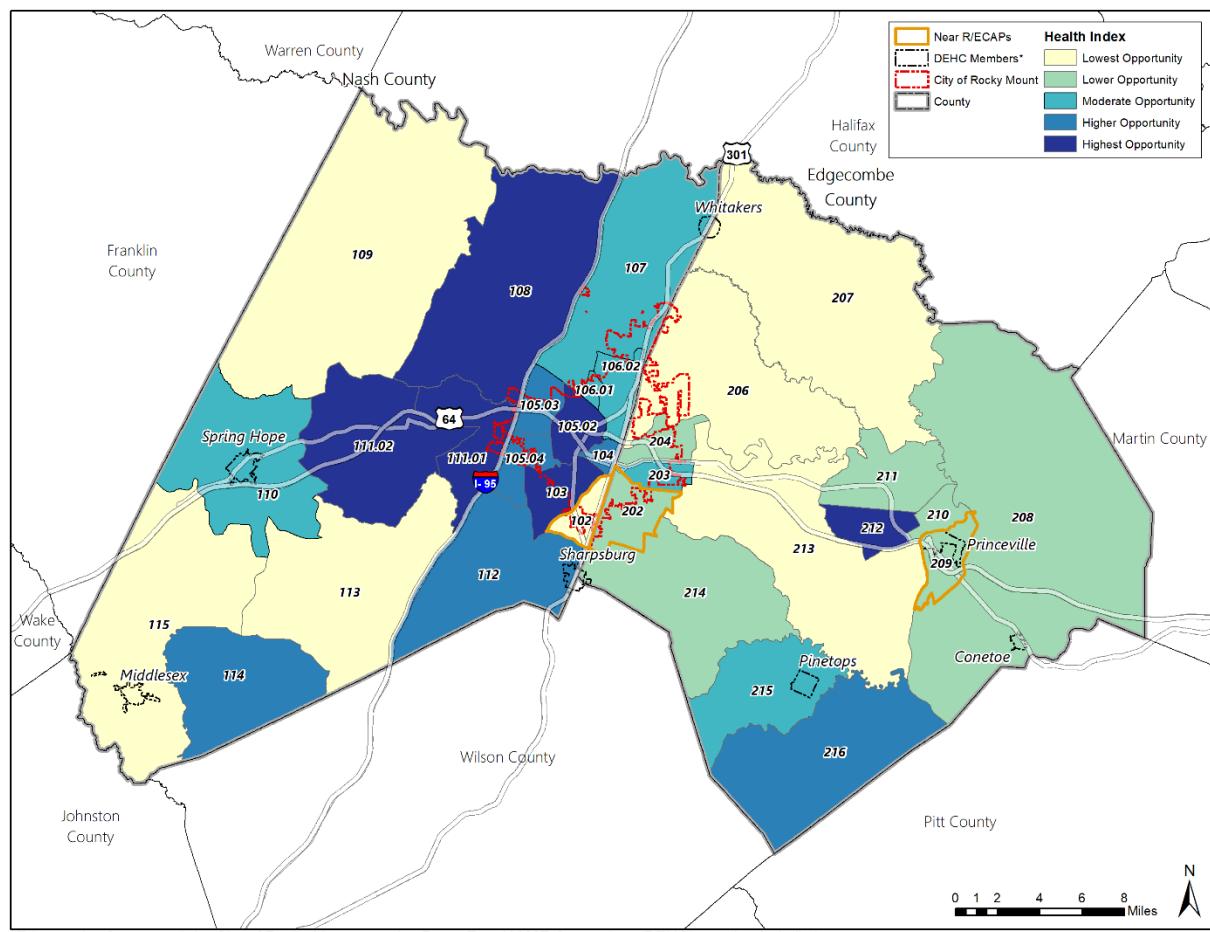
*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

2018 Source: 2018 American Community Survey: DP03, S1501, S2301

Environmental Health Index

The Environmental Health Index summarizes potential exposure to harmful toxins and access to health insurance and food at the census tract level. Toxins include carcinogenic, respiratory, and neurological hazards. Low food access was defined as the percentage of low income individuals beyond a half-mile from a supermarket. Higher index values indicate less exposure to toxins harmful to human health and better access to food for low-income individuals and health insurance. Environmental hazards have an adverse effect on children's growth and development and can limit one's ability to work. Low-income and minority individuals are also found to be disproportionately affected by environmental hazards, perpetuating the lack of opportunity for vulnerable populations. The lowest environmental health scores are concentrated in more rural areas and in most of Edgecombe County, which includes the Near R/ECAPs. These areas tend to have higher levels of poverty and, especially in the case of rural areas, are located far from grocery stores.

Map 18 Environmental Health Index



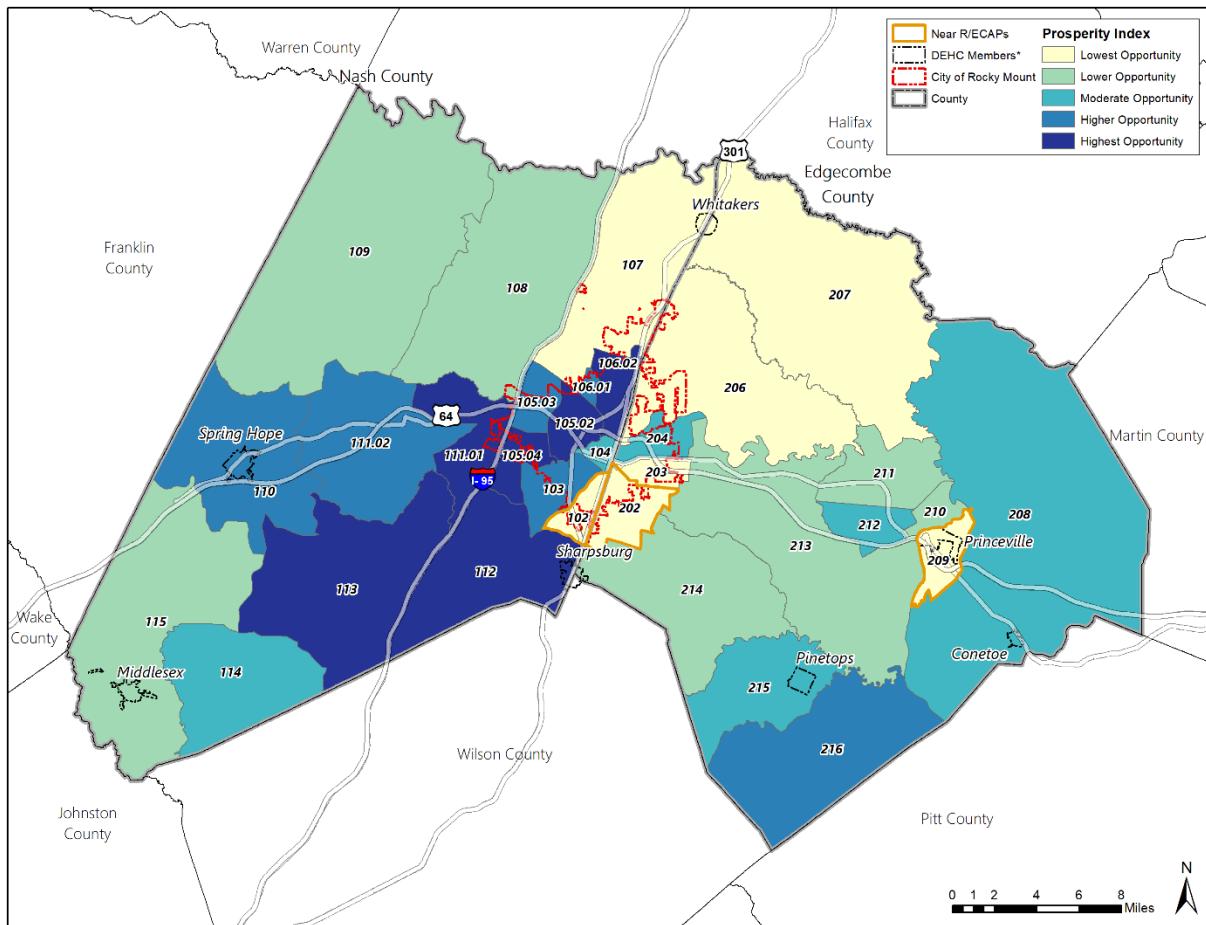
*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: 2018 American Community Survey: S2701; HUD Affirmatively Furthering Fair Housing (AFFH), 2015; National Air Toxics Assessment (NATA), 2015; USDA Food Access Research Atlas, 2015

Prosperity Index

This index is a combination of poverty rate and the percentage of households with children receiving public assistance. Public assistance includes Supplemental Security Income (SSI), cash public assistance income, or Food Stamps/SNAP. Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing. Poverty is primarily concentrated in southern Rocky Mount, Princeville, and along the Nash-Edgecombe County border north of Rocky Mount. Nash County, especially areas close to the City of Rocky Mount, tended to have higher levels of prosperity.

Map 19 Prosperity Index



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

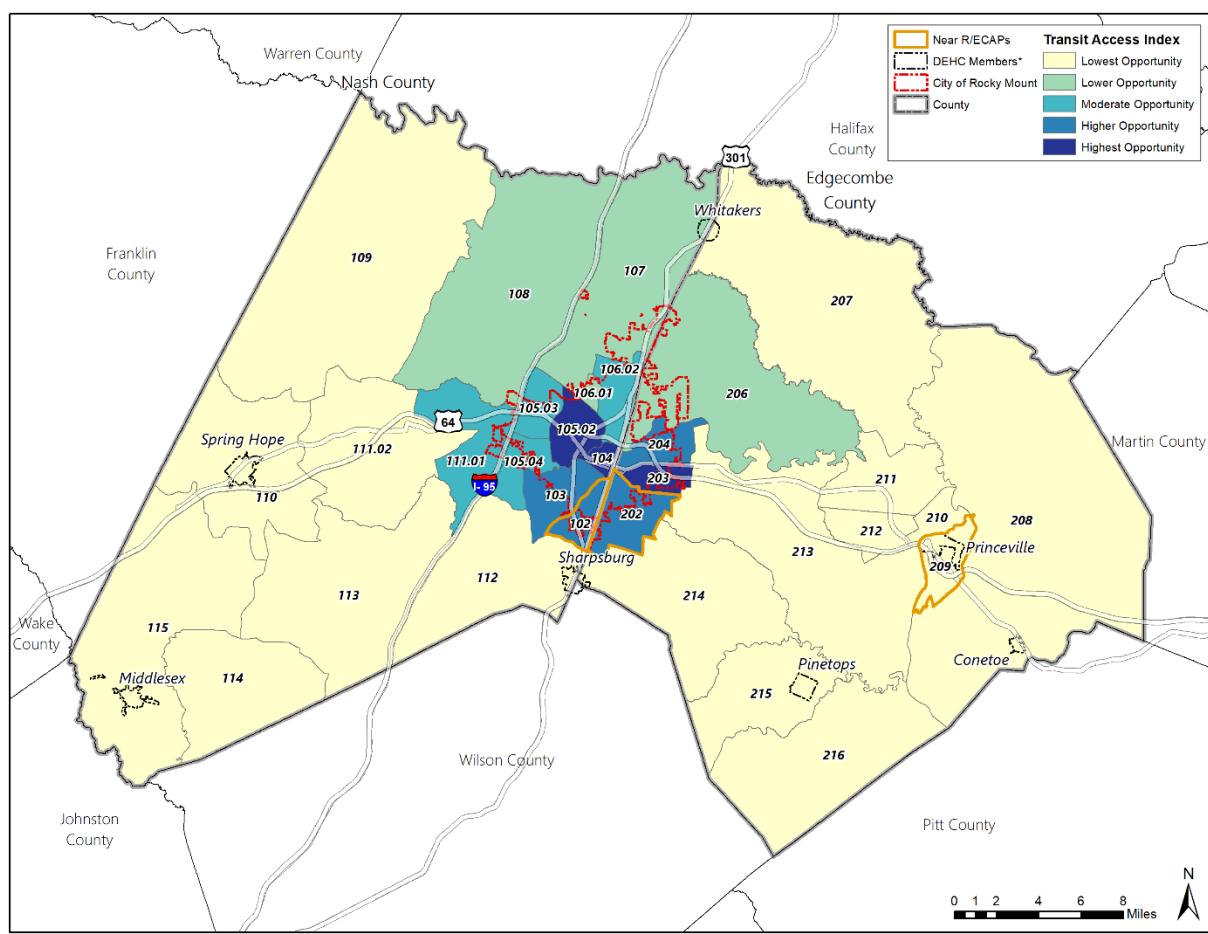
Source: 2018 American Community Survey: S1701, B09010

Transit Access Index

Transit Access represents the ease with which people can access public transportation. According to the Federal Highway Administration (FHWA) under the US Department of Transportation, most people are willing to walk for five to ten minutes to a transit stop. FHWA uses these walking times as a proxy for distance, estimating accessible transit stops being $\frac{1}{4}$ to $\frac{1}{2}$ mile away from a pedestrian's starting point, typically their place of residence. To calculate accessibility, $\frac{1}{4}$ mile and $\frac{1}{2}$ buffers were placed around each transit stop to find the percentage of a census tract that is within walking distance to a transit stop. This percentage was averaged to produce the Transit Access Index.

Expectedly, the City of Rocky Mount has the best access to public transit with Tar River Transit concentrating most of its fixed-route bus services in and around the City. The Near R/ECAPs in Rocky Mount have better access to public transit than most of the region. However, the Near R/ECAP in Princeville has very poor access, which could have negative effects on low-income residents to access jobs, employment, and essential services. It is important to note that Tar River Transit also operates more limited services to areas outside of city limits within Nash and Edgecombe Counties using their Rural General Public Program and Public Shuttle. While the shuttle is on a fixed route, the Public Programs allows individuals to schedule in advance on weekdays.

Map 20 Transit Access Index



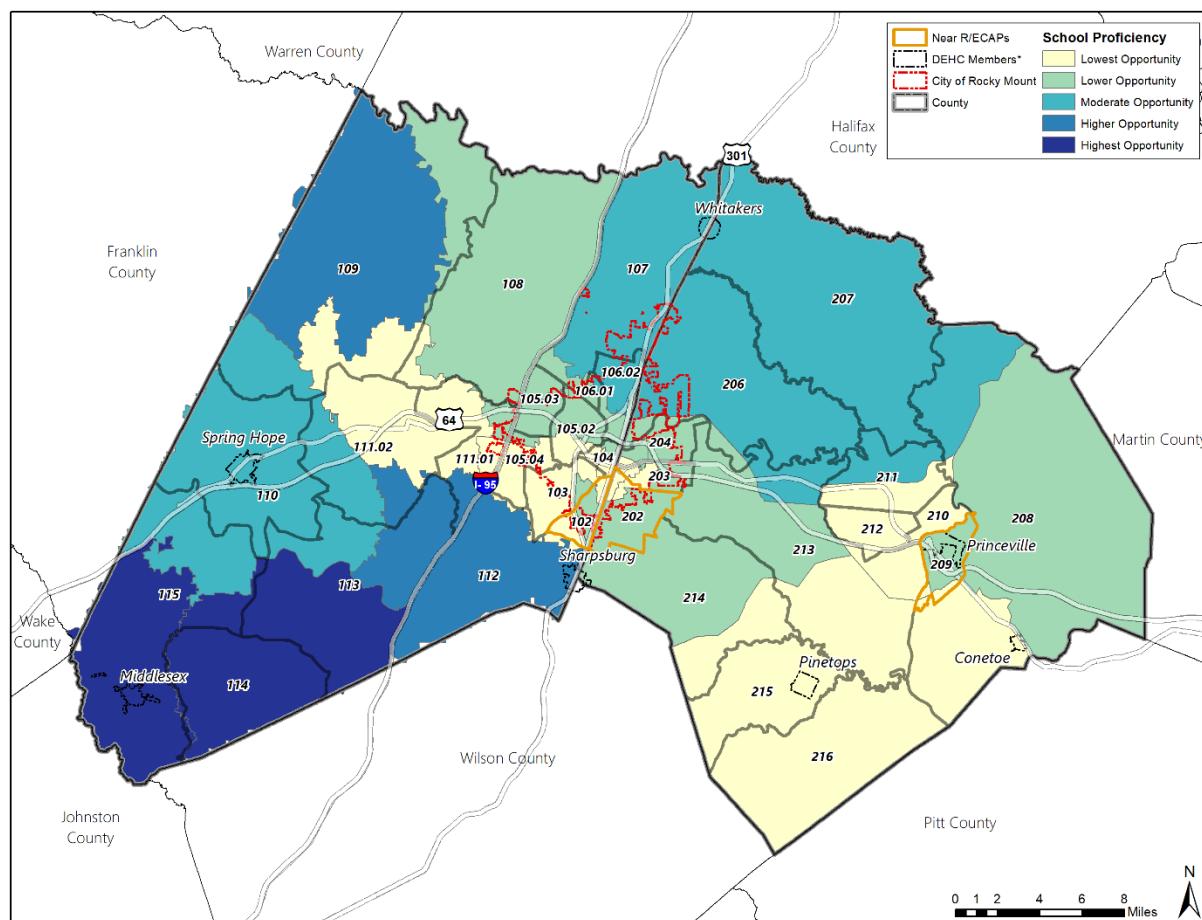
*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: Tar River Transit

School Proficiency Index

The School Proficiency Index uses public school-level data on the performance students on state exams to describe which neighborhoods have high-performing elementary and secondary schools nearby and which are near lower performing elementary schools. This data is supplied by the US Department of Education through EDFacts for the school year (SY) 2017-18, providing the percentage of students in a school that scored at or above “proficient,” which is defined by the North Carolina Department of Public Instruction (NC DPI) for the State. The index aggregates the percentage of proficient students at the school district level for Reading/Language Arts and Math assessments and normalizes these scores relative to other school districts within Nash and Edgecombe Counties. Additionally, the disparity between the proficiency scores of economically disadvantaged students to the performance of all students at a particular school are also taken into account. Some local education agencies have suppressed their data to protect student privacy; as a result, they are not reflected on the map. Generally, public schools in Nash County located further away from the City of Rocky Mount are higher performing while schools in the City of Rocky Mount and Edgecombe County have lower performing schools. The proficiency of schools in the Near R/ECAPs also showed low performance.

Map 21 School Proficiency Index in Rocky Mount, NC



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: U.S. Department of Education, EDFacts, 2017-2018

Assisted Housing Location Patterns

One way to utilize the Communities of Opportunity model is to evaluate the degree to which the city's and the consortium's assisted housing investment has been made in higher opportunity areas. The assisted inventory includes rental properties funded through federal subsidy programs such as the Low-Income Housing Tax Credit (LIHTC) program, HOME, federal Housing Trust Fund and other federal and State resources.

Housing programs serving very-low- and low-income households have historically exacerbated problems of concentrated poverty. However, modern agencies are attempting to administer programs and housing to provide better opportunities for their clients. *While public housing, LIHTC properties, and HCV holders tend to be concentrated in a small geographic area within Rocky Mount, these areas have the highest access to public transit and a concentration of public services and health care services such as Nash UNC Health Care.* Some assisted housing outside of R/ECAPs are located in areas of higher opportunities, such as those on the Nash County side of Rocky Mount. This allows for income-eligible households to improve their and future generations' life outcomes.

City of Rocky Mount

The City of Rocky Mount operates four housing programs: HOME Investment Partnerships Program, Housing Rehab Matching Rebate Program, the Housing Repair Loan Program, and the Urgent Repair Program.

The City of Rocky Mount serves as the lead entity for the Down East HOME Consortium. The HOME program in the City of Rocky Mount serves to provide decent, safe, and affordable housing for area residents. This program primarily funds housing rehabilitation in scattered sites under the Consortium. Between 2017 and 2019, 28 households outside of Rocky Mount were assisted through the HOME Program. With the City maintaining other housing programs for its own residents, HOME funds are primarily distributed across other consortium members; no households assisted with HOME funds were located within the Rocky Mount city limits.

The Housing Rehab Matching Rebate Program offers a 50/50 matching rebate for up to \$12,500 for homeowners to have eligible repairs to their homes that are at least 50 years old. Eligible repairs include replacement windows; replacement doors; siding repair and/or replacement, system upgrades (i.e., plumbing, electrical, and HVAC); roof repair and/or replacement; lead, mold, and asbestos remediation; water heater replacement; exterior painting; accessibility features for entering and exiting the home; and landscaping. This program operates on a first come, first serve basis and lacks an income requirement to reach a wider range of residents.

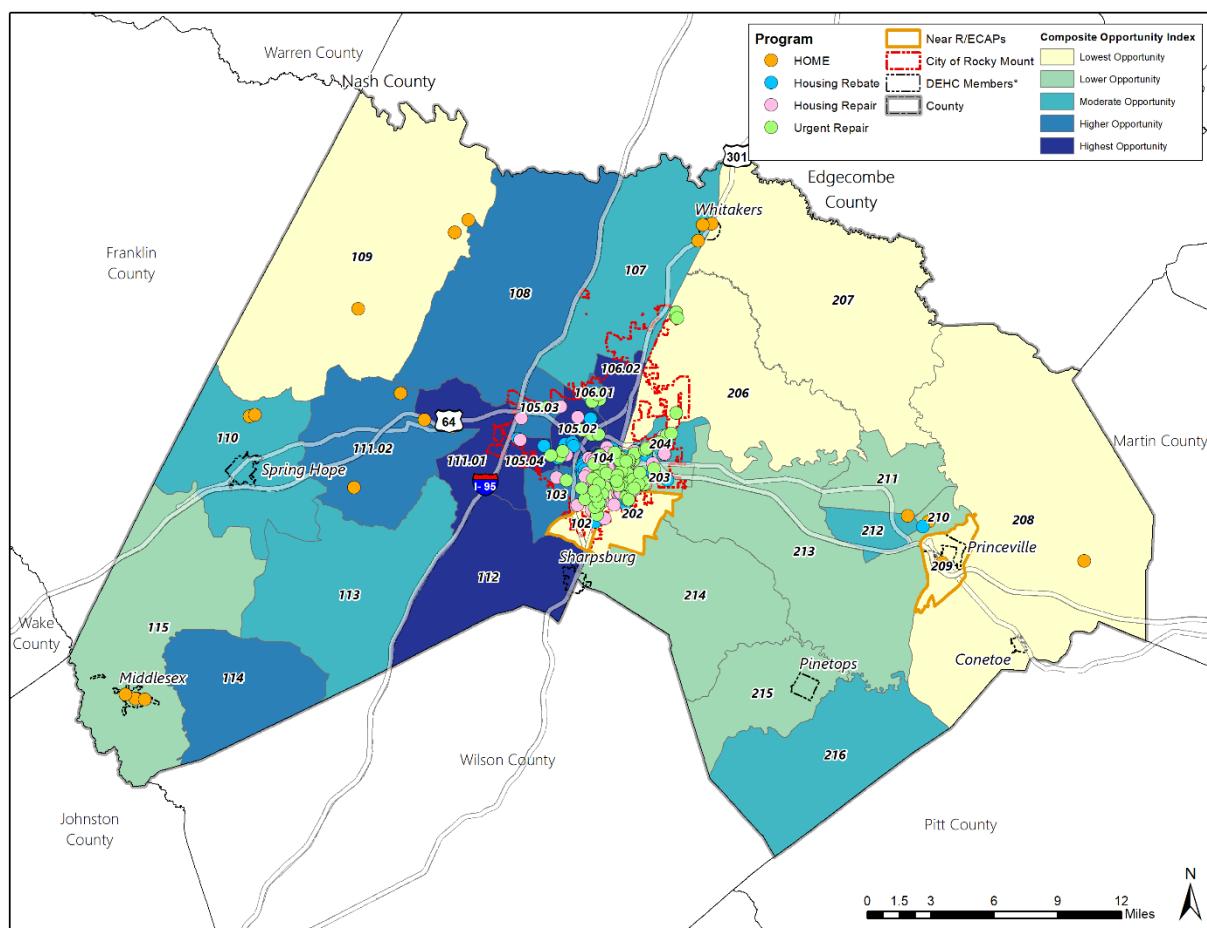
Between 2017 and 2019, 112 households received matching rebates for eligible home repairs. Of these households, 62 program participants lived in higher opportunity areas on the Nash County side of the City. This is likely due to the lack of income requirement and the requirement to pay for repair costs upfront.

The Housing Repair Program offers a forgivable loan of up to \$12,500 to assist with eligible repairs for homes that are at least 50 years old. Eligible repairs include energy efficiency improvements (i.e., replacement windows and doors), system upgrades (i.e., plumbing, electrical, and HVAC), roof repair and/or replacement, water heater replacement, lead, mold, or asbestos abatement, and accessibility features for entering and exiting the home. This program is funded

with CDBG funds and the City of Rocky Mount General Fund. Between 2017 and 2019, 103 households were assisted under the Housing Repair Program. Most of these households (70) resided in lower opportunity areas on the southern and eastern portions of the city.

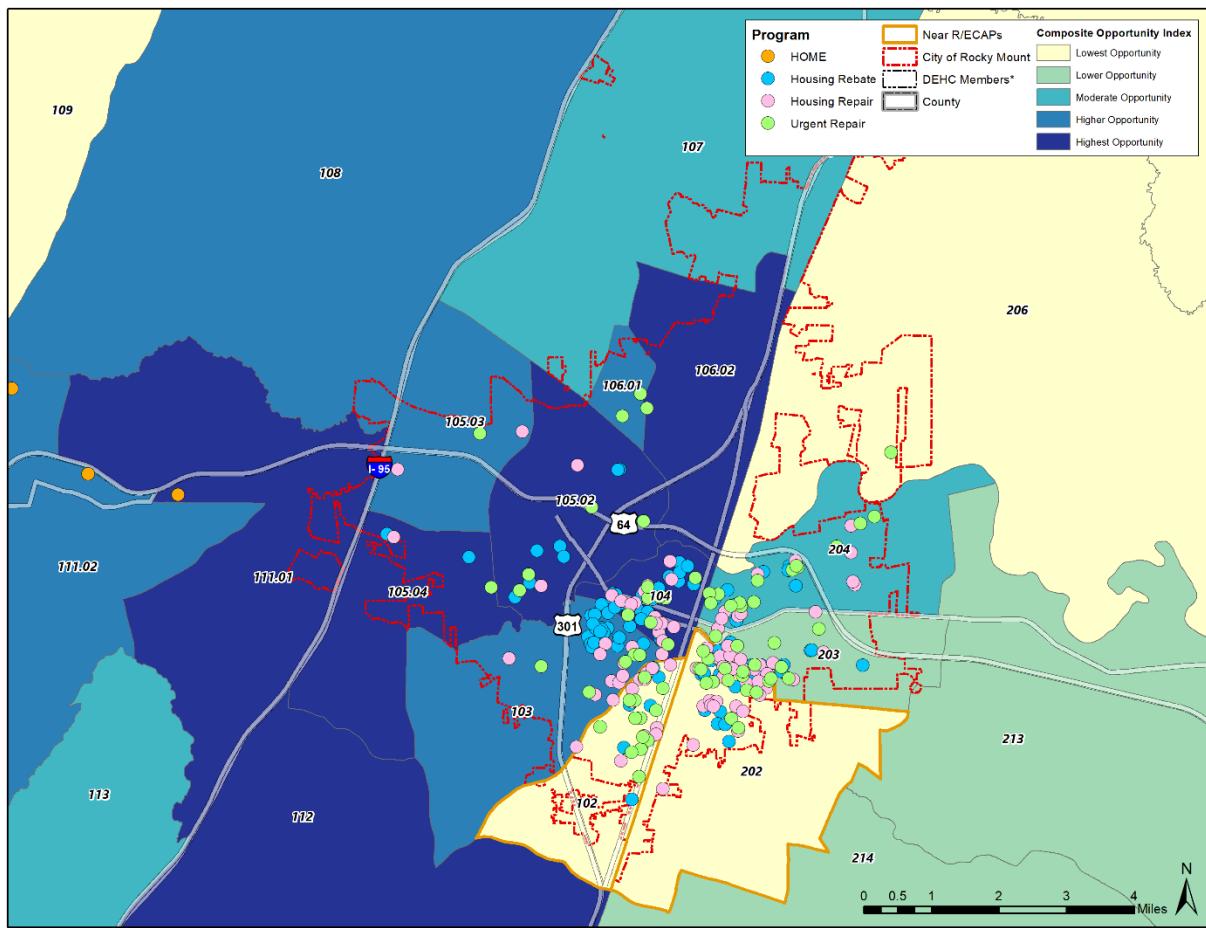
The Urgent Repair Program offers a forgivable loan up to \$12,500 to assist with the rehabilitation of deteriorated homes. This program aims to secure homes that have an imminent threat to the life or safety of homeowners. Eligible repairs include flooring systems, system upgrades (i.e., plumbing, electrical, and HVAC), roof repair and/or replacement, lead, mold, or asbestos abatement, and accessibility features for entering and exiting the home. The Urgent Repair Program is funded by the North Carolina Housing Finance Agency and City of Rocky Mount General Fund. Between 2017 and 2019, 91 households were assisted under the Urgent Repair Program. The majority of program participants (62) resided in lower opportunity areas in the City.

Map 22 City of Rocky Mount-administered Housing Programs, Countywide



Source: City of Rocky Mount, Department of Community & Business Development

Map 23 City of Rocky Mount-administered Housing Programs, City



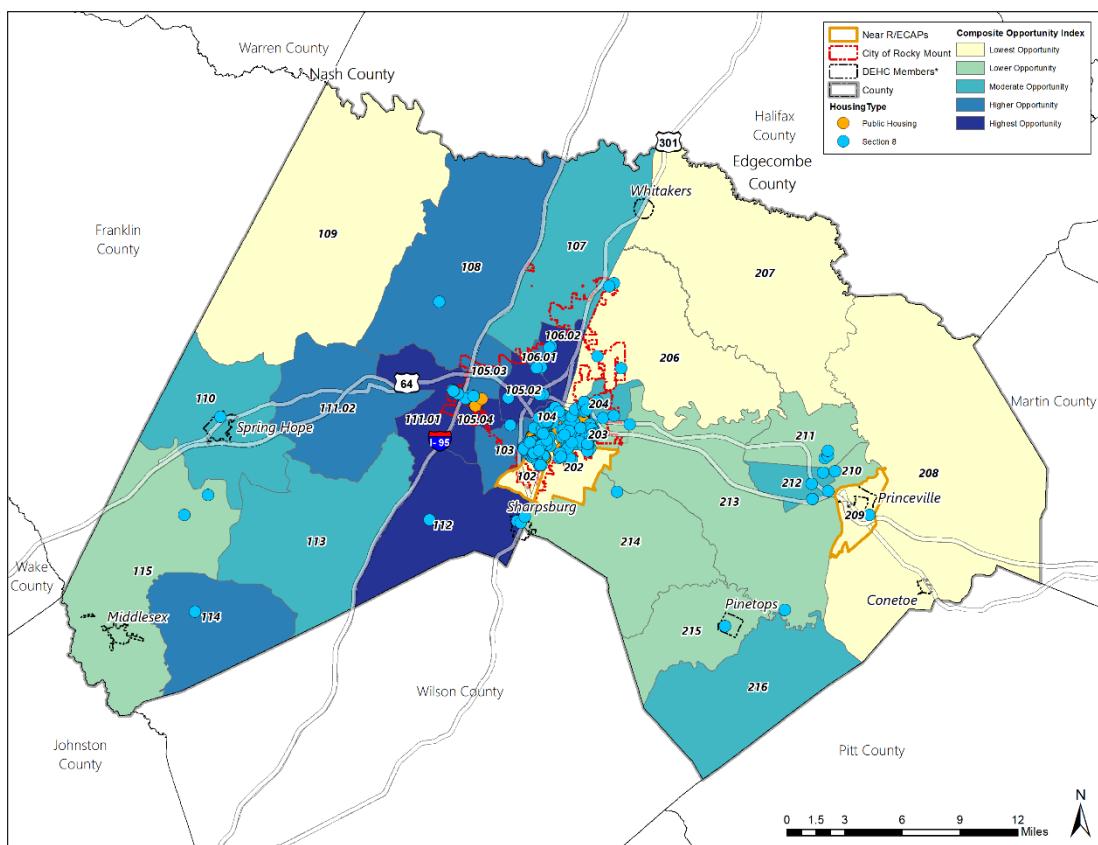
Source: City of Rocky Mount, Department of Community & Business Development

Rocky Mount Housing Authority

As of 2020, Rocky Mount Housing Authority (RMHA) maintains 744 units of public housing units and administers 259 Section 8 Housing Choice Vouchers (HCV) throughout Nash and Edgecombe Counties. RMHA operates primarily within the City of Rocky Mount, administering 28 HCVs outside of the City of Rocky Mount. While scattered throughout the two counties, Tarboro contains most of these vouchers, serving as the residence of 11 HCV holders.

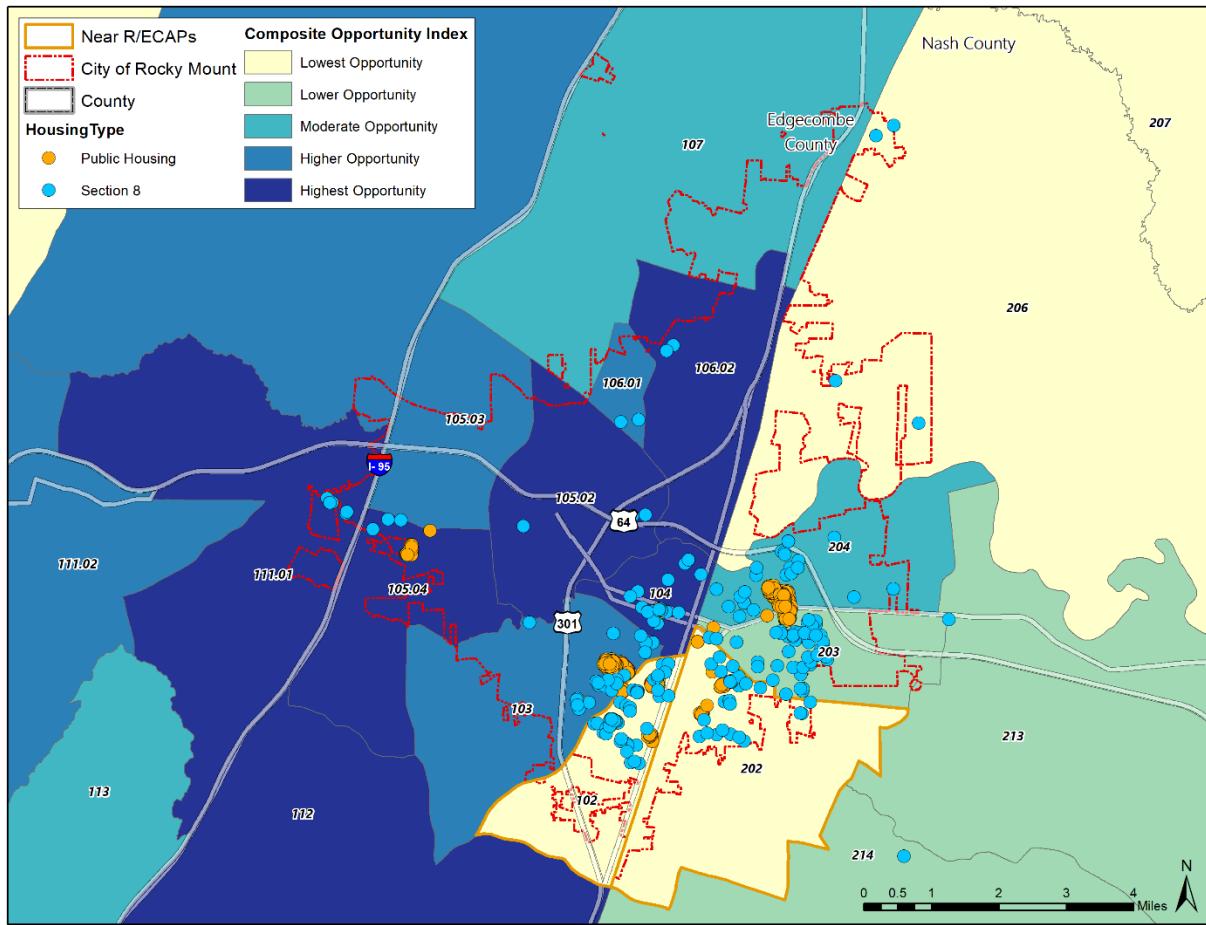
Of all RMHA-administered units, 135 public housing units and 87 HCV holders are located in Near R/ECAPs. While these areas tend to have poorer economic and health outcomes, these areas have good access to public transit and job opportunities. Additionally, the Near R/ECAPs have excellent access to public transit. Conversely, there are 280 public housing units and 68 HCVs in higher opportunity areas. These units are concentrated primarily west of Raleigh Boulevard in the southwestern and central portions of the City.

Map 24 RMHA Housing Units in Nash and Edgecombe Counties



Source: Rocky Mount Housing Authority

Map 25 RMHA Housing Units in the City of Rocky Mount

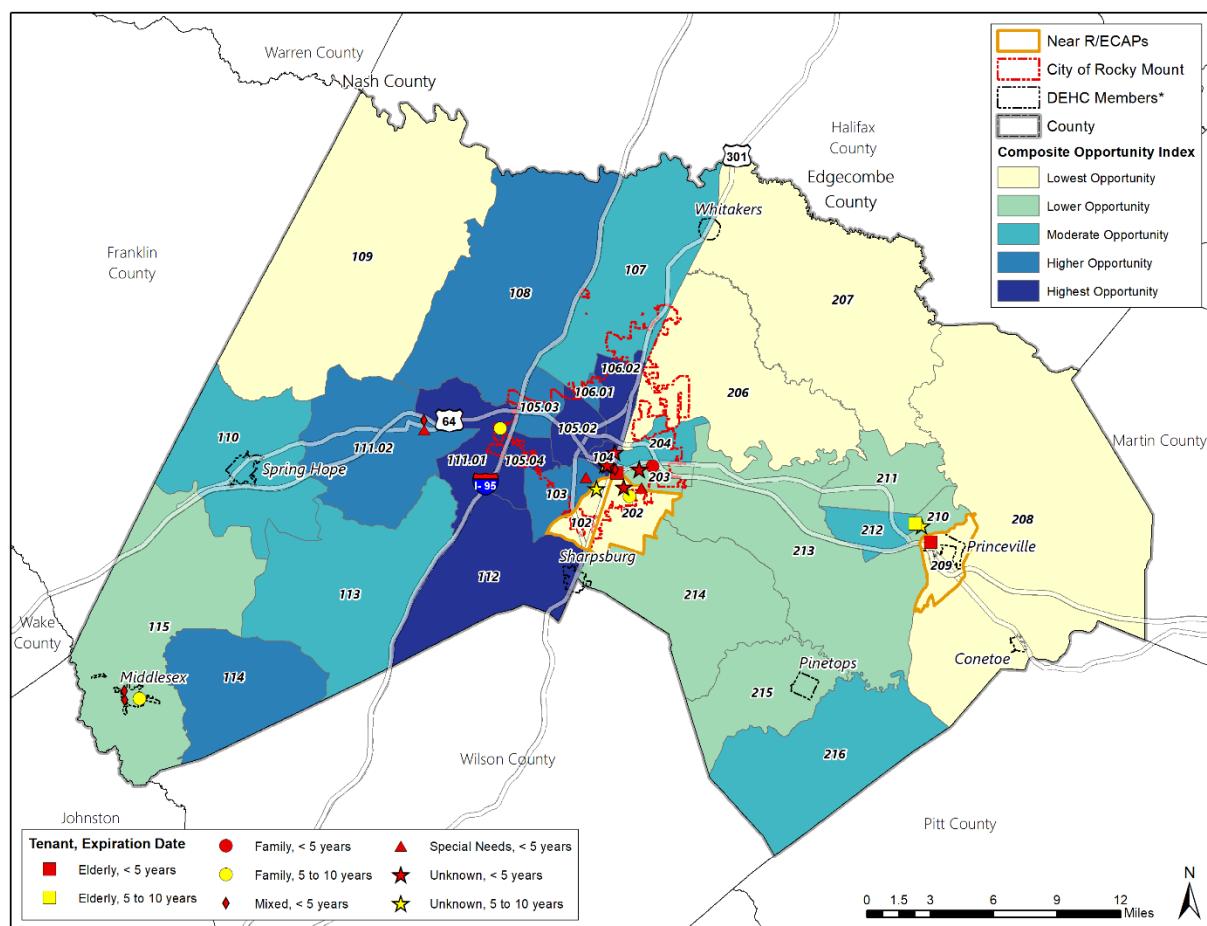


Source: Rocky Mount Housing Authority

Period of Affordability

The following map and table reflect the distribution of assisted units expected to have their period of affordability expire before 2030. The units are subject to income restrictions that keep them affordable for a finite period of time. Preservation of affordable units is more cost effective than the construction of new affordable units, so focusing on the renewal of these affordability restrictions will preserve a significant contribution to the total supply of affordable housing over the next decade. The table also provides the number of expiring units that are owned by for-profit entities because these are most likely at greatest for conversion to market-rate units, particularly in higher opportunity markets. A total of 23 assisted properties consisting of 522 units are expected to have their periods of affordability expire within ten years. Of these expiring units, 293 units are expected to expire within five years. Distribution of expiring units is concentrated in the City of Rocky Mount, containing 310 units across 15 properties.

Map 26 Subsidized Housing Units expected to expire before 2030



Source: HUD's Picture of Subsidized Housing, 2018; HUD LIHTC Database, 2017

Table 19 Assisted Inventory in Nash and Edgecombe Counties, 2020

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
UNITED MANOR COURTS	1200 Elm St, Tarboro, NC 27886-3214	Tarboro	Edgecombe	50	9/30/2020	Unknown	Family
ARC/HDS EDGECOMBE CO APARTMENTS	169 Wayfarer Ct, Rocky Mount, NC 27801-6212	Rocky Mount	Edgecombe	9	12/16/2020	Non-Profit	Disabled
BROOKWAY VILLAGE	326 N Aviation Ave, Nashville, NC 27856-1706	Nashville	Nash	36	1/1/2021	Limited Profit	Elderly or disabled
	112 Donovan Ct, Rocky Mount, NC 27801-5985	Rocky Mount	Edgecombe	24	3/21/2021	For Profit	Elderly or disabled
THORNE RIDGE II APARTMENTS	1310 Dreaver St, Rocky Mount, NC 27801-8034	Rocky Mount	Edgecombe	40	4/30/2021	Unknown	Unknown
	512 Sunset Ave, Rocky Mount, NC 27804-5615	Rocky Mount	Nash	1	8/30/2021	Unknown	Unknown
RM WILSON APARTMENTS	336 Marigold St, Rocky Mount, NC 27801-5582	Rocky Mount	Edgecombe	50	11/1/2021	Profit Motivated	Elderly
PRINCE COURT APARTMENTS	172 Howard St, Princeville, NC 27886-5260	Princeville	Edgecombe	30	6/1/2022	Profit Motivated	Elderly
ARC/HDS EDGECOMBE/NASH GH #1	145 Wayfarer Ct, Rocky Mount, NC 27801-6282	Rocky Mount	Edgecombe	6	8/31/2023	Non-Profit	Disabled
CREEKRIDGE APARTMENTS	12881 Creekridge Dr, Middlesex, NC 27557-9372	Middlesex	Nash	25	12/30/2023	Unknown	Unknown
ARC/HDS NASH COUNTY GROUP HOME	211 Simbelyn Dr, Nashville, NC 27856-1735	Nashville	Nash	7	12/31/2023	Non-Profit	Disabled

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
HARAMBEE SQUARE APARTMENTS	148 S Washington St, Rocky Mount, NC 27801-5501	Rocky Mount	Edgecombe	24	1/1/2024	Unknown	Unknown
	531 Jefferson St, Rocky Mount, NC 27804-2733	Rocky Mount	Nash	1	10/21/2024	For Profit	Elderly or disabled
	116 Ligustrum Ct, Rocky Mount, NC 27801-6143	Rocky Mount	Edgecombe	2	12/6/2024	Unknown	Family
	128 Ligustrum Ct, Rocky Mount, NC 27801-6143	Rocky Mount	Edgecombe	8	12/6/2024	For Profit	Elderly or disabled
OAKDALE APARTMENTS	7254 Oakdale Apartments, Middlesex, NC 27557-8236	Middlesex	Nash	24	1/1/2025	Limited Profit	Elderly or disabled
ARC/HDS EDGECOMBE/NASH GH #2	827 Evergreen Rd, Rocky Mount, NC 27803-2426	Rocky Mount	Nash	6	5/31/2025	Non-Profit	Disabled
TARBORO SQUARE	100 W WILSON ST, TARBORO, NC 27886	Tarboro	Edgecombe	24	12/20/2025	Unknown	Unknown
MIDDLESEX MANOR	Haynes St, Middlesex, NC 27557	Middlesex	Nash	16	1/1/2027	Limited Profit	Family
APARTMENT 4	668 Sunset Ave, Rocky Mount, NC 27804-5618	Rocky Mount	Nash	4	9/25/2028	For Profit	Elderly or disabled
ELMHURST APARTMENTS	1000 SIMMONS ST, TARBORO, NC 27866	Tarboro	Edgecombe	50	12/1/2029	Profit Motivated	Elderly
CARRIAGE COURT APARTMENTS	4651 Sunset Ave, Rocky Mount, NC 27804-2922	Rocky Mount	Nash	48	1/1/2030	Unknown	Family

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
	1200 Boone St, Rocky Mount, NC 27803	Rocky Mount	Nash	12	7/21/2030	Unknown	Family
SOUTHSIDE ACRES APARTMENTS	150 Parrish Ct, Rocky Mount, NC 27801-6931	Rocky Mount	Edgecombe	75	8/31/2030	Profit Motivated	Family
WILSHIRE APARTMENTS	806 Old Wilson Rd, Pinetops, NC 27864-9898	Pinetops	Edgecombe	48	11/6/2030	Multiple	Family
WOOD HAWK APARTMENTS	1836 Eaglecrest Cir, Rocky Mount, NC 27801-7426	Rocky Mount	Edgecombe	58	1/1/2031	For Profit	Elderly or disabled
ROLLING MEADOWS APARTMENTS	116 Boyd Ct, Rocky Mount, NC 27803-4204	Rocky Mount	Nash	130	2/28/2031	Profit Motivated	Family
COVENANT HOMES	135 Covenant Ct, Rocky Mount, NC 27804-1719	Rocky Mount	Nash	100	3/29/2031	Non-Profit	Elderly
HAWTHORNE COURT APARTMENTS	1609 Barlow Rd, Tarboro, NC 27886-4750	Tarboro	Edgecombe	48	1/1/2032	For Profit	Family
DEVONSHIRE APARTMENTS	400 Devonshire Dr, Pinetops, NC 27864-9534	Pinetops	Edgecombe	25	1/1/2032	Multiple	Family
MEADOW PARK APARTMENTS	313 Meadow Park Dr, Nashville, NC 27856-1451	Nashville	Nash	25	1/1/2032	Multiple	Family
PINE GROVE	113 E MAIN ST, SHARPSBURG, NC 27878	Sharpsburg	Nash	40	5/23/2032	Multiple	Family
CARRIAGE COURT II APARTMENTS	4603 Hackney Rd, Rocky Mount, NC 27804	Rocky Mount	Nash	32	1/1/2033	For Profit	Mixed

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
GEORGE E'S PLACE	428 Simpson Dr, Tarboro, NC 27886-4765	Tarboro	Edgecombe	25	1/1/2033	Multiple	Elderly or disabled
RIDGEWAY APARTMENTS	604 Ridgeway Dr, Spring Hope, NC 27882-9332	Spring Hope	Nash	32	1/1/2034	Limited Profit	Elderly or disabled
OAKHILL APARTMENTS	104 Periwinkle Ln, SPRING HOPE, NC 27882-9322	Spring Hope	Nash	25	1/1/2034	Multiple	Family
EDGEWOOD PLACE APARTMENTS	1317 W Wilson St, Tarboro, NC 27886-4862	Tarboro	Edgecombe	50	2/17/2034	Limited Profit	Family
RICHARDSON COURT	1101 S Brake St, Nashville, NC 27856-1670	Nashville	Nash	50	3/31/2034	Multiple	Family
	624 E Holly St, Rocky Mount, NC 27801-5340	Rocky Mount	Edgecombe	4	6/4/2034	Unknown	Unknown
REPLACEMENT HOUSING RECOVERY PLAN	1363 Branch St, Rocky Mount, NC 27801-6803	Rocky Mount	Edgecombe	2	6/12/2034	For Profit	Elderly or disabled
MADISON PLACE APARTMENTS	1773 Beaver Pond Dr, Rocky Mount, NC 27804-6325	Rocky Mount	Nash	40	7/28/2034	For Profit	Family
TARBORO SQUARE APARTMENTS	1615 W Wilson St, Tarboro, NC 27886-4721	Tarboro	Edgecombe	24	1/1/2035	Limited Profit	Family
MS HAYWORTH APARTMENTS	931 Tessie St, Rocky Mount, NC 27801-5984	Rocky Mount	Edgecombe	40	2/12/2035	Non-Profit	Elderly
BULLOCK/MCLEOD APARTMENTS	700 Arcenia Hines Dr, Rocky Mount, NC 27803-4456	Rocky Mount	Nash	48	2/15/2035	Non-Profit	Elderly

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
	416 Park Ave, Rocky Mount, NC 27801-5351	Rocky Mount	Edgecombe	1	4/11/2036	Unknown	Elderly or disabled
	758 Beal St, Rocky Mount, NC 27804-5201	Rocky Mount	Nash	6	8/9/2036	Unknown	Unknown
ASBURY PARK APARTMENTS	400 Walston St, Princeville, NC 27886-5281	Princeville	Edgecombe	49	10/31/2036	Profit Motivated	Family
PENDER SQUARE I	500 Benson Dr, Tarboro, NC 27886-4701	Tarboro	Edgecombe	72	4/26/2037	Limited Profit	Family
FOX RIDGE APARTMENTS	7 BARNHILL ST, SHARPSBURG, NC 27878	Sharpsburg	Nash	32	5/23/2037	Multiple	Family
ROLLINWOOD MANOR	144 Rollingwood Manor, Rocky Mount, NC 27801-7889	Rocky Mount	Edgecombe	64	1/1/2038	For Profit	Elderly or disabled
CAC OF NASH/ROCKY MOUNT	101 Hannah Ln, Rocky Mount, NC 27803-4268	Rocky Mount	Nash	11	4/28/2038	Non-Profit	Disabled
	518 Sunset Ave, Rocky Mount, NC 27804-5615	Rocky Mount	Nash	10	12/3/2038	Unknown	Family
HILMA GREENS	810 W WILSON ST, TARBORO, NC 27886	Tarboro	Edgecombe	64	1/23/2039	For Profit	Family
	605 E Holly St, Rocky Mount, NC 27801	Rocky Mount	Edgecombe	2	2/27/2039	Unknown	Family
	611 E Holly St, Rocky Mount, NC 27801-5339	Rocky Mount	Edgecombe	4	2/27/2039	Unknown	Unknown
GREGG COURT APARTMENTS	940 Gregg Ct, Rocky Mount,	Rocky Mount	Nash	72	8/31/2039	Profit Motivated	Elderly

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
	NC 27803-4218						
GREENTREE VILLAGE	500 E Branch St, Spring Hope, NC 27882-9417	Spring Hope	Nash	32	4/28/2040	Multiple	Elderly
OAK TREE APARTMENTS	1847 S 1st St, Nashville, NC 27856-8879	Nashville	Nash	32	9/7/2040	Limited Profit	Family
HUNTER'S PARK	301 Daniel St, Tarboro, NC 27886-2247	Tarboro	Edgecombe	40	4/22/2041	Multiple	Elderly
MAYFAIR APARTMENTS	1602 Chicora Ct, Rocky Mount, NC 27804-8555	Rocky Mount	Nash	40	1/7/2042	Non-Profit	Elderly
HUNTER HILL APARTMENT HOMES	208 Hunter Hill Rd, Tarboro, NC 27886-4037	Tarboro	Edgecombe	56	1/1/2044	For Profit	Family
CHC OF ROCKY MOUNT #2	511 Western Ave, Rocky Mount, NC 27804-5626	Rocky Mount	Nash	7	8/26/2044	Non-Profit	Disabled
DREW HILLS APARTMENTS	3 Drew Hill Ct, Battleboro, NC 27809-9617	Battleboro	Nash	44	4/8/2045	Limited Profit	Family
BEAL STREET SQUARE	200 N GRACE ST, ROCKY MOUNT, NC 27804	Rocky Mount	Nash	80	1/1/2047	Unknown	Family
WALNUT GROVE APARTMENTS	101 W TAYLOR ST, WHITAKERS, NC 27891	Whitakers	Edgecombe	24	1/25/2047	Limited Profit	Family
RAVENWOOD CROSSING	545 Ravenwood Dr, Rocky Mount, NC 27803-4229	Rocky Mount	Nash	80	1/1/2048	Unknown	Family
GLEN BRIDGE APARTMENTS	501 Church St, Princeville, NC 27886-5418	Princeville	Edgecombe	24	12/24/2048	Non-Profit	Family

Property Name	Property Address	City	County	Total Units	Earliest End Date	Owner-Type	Target Tenant Type
PINEHURST HOMES	17 Pinehurst Homes, Tarboro, NC 27886-2434	Tarboro	Edgecombe	193	Unknown	Public Entity	Unknown
WESTEND TERRACE COMMUNITY	697 Paul St, Rocky Mount, NC 27803-3423	Rocky Mount	Nash	363	Unknown	Public Entity	Unknown
WEEKS ARMSTRONG HOMES COMMUNITY	229 Marigold St, Rocky Mount, NC 27801-5577	Rocky Mount	Edgecombe	392	Unknown	Public Entity	Unknown

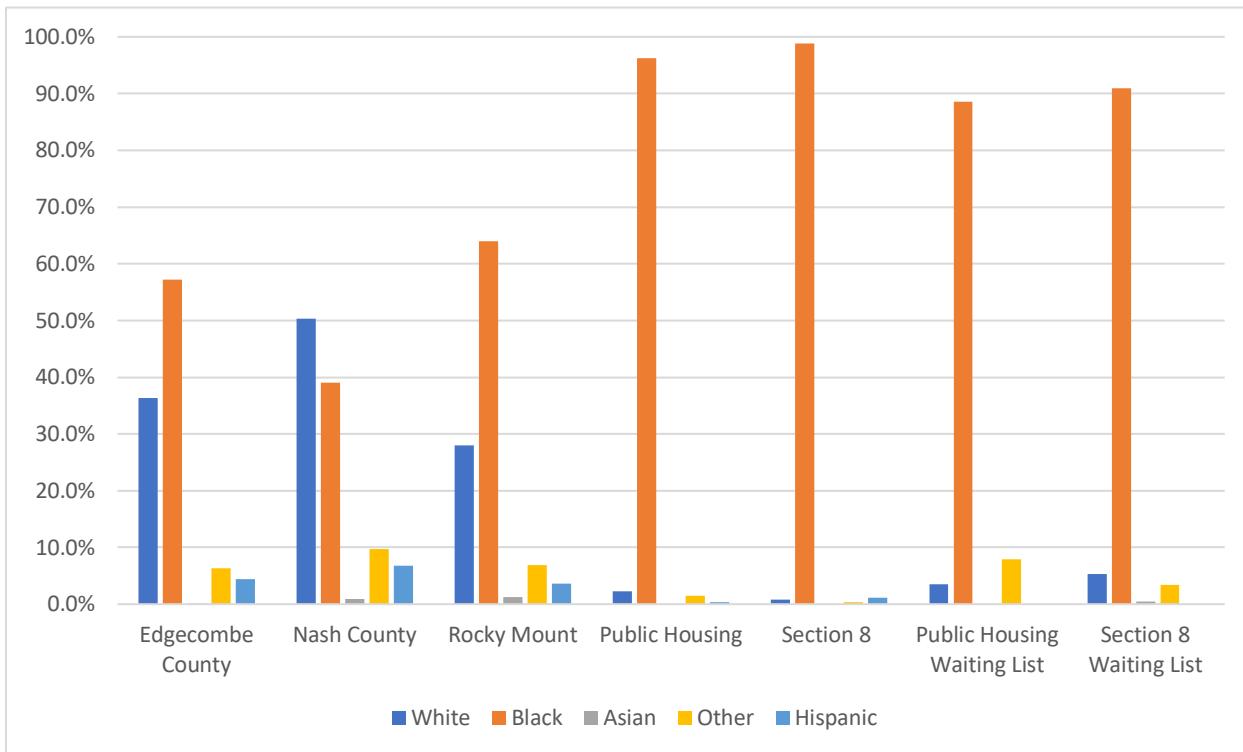
Source: National Housing Preservation Database, 2020

Public Housing Authority Tenant/Applicant Demographics

Historically, and in general, assisted housing had been highly segregated and concentrated in areas of poverty through ineffective management, redlining, and other discriminatory practices at the local, state and federal levels. However, public housing authorities, such as the Rocky Mount Housing Authority (RMHA), are attempting to take appropriate actions to overcome the effects of these impediments. RMHA maintains 744 units of public housing units and administers 259 Section 8 Housing Choice Vouchers (HCV) throughout Nash and Edgecombe Counties but primarily in Rocky Mount.

Members of the protected classes are disproportionately represented as current RMHA tenants and waiting list applicants. Black households are overrepresented as current RMHA tenants and waiting list applicants. This is likely due to the disproportionately lower incomes and higher poverty rates that the region's Black population faces, as mentioned in the Demographics section of the AI.

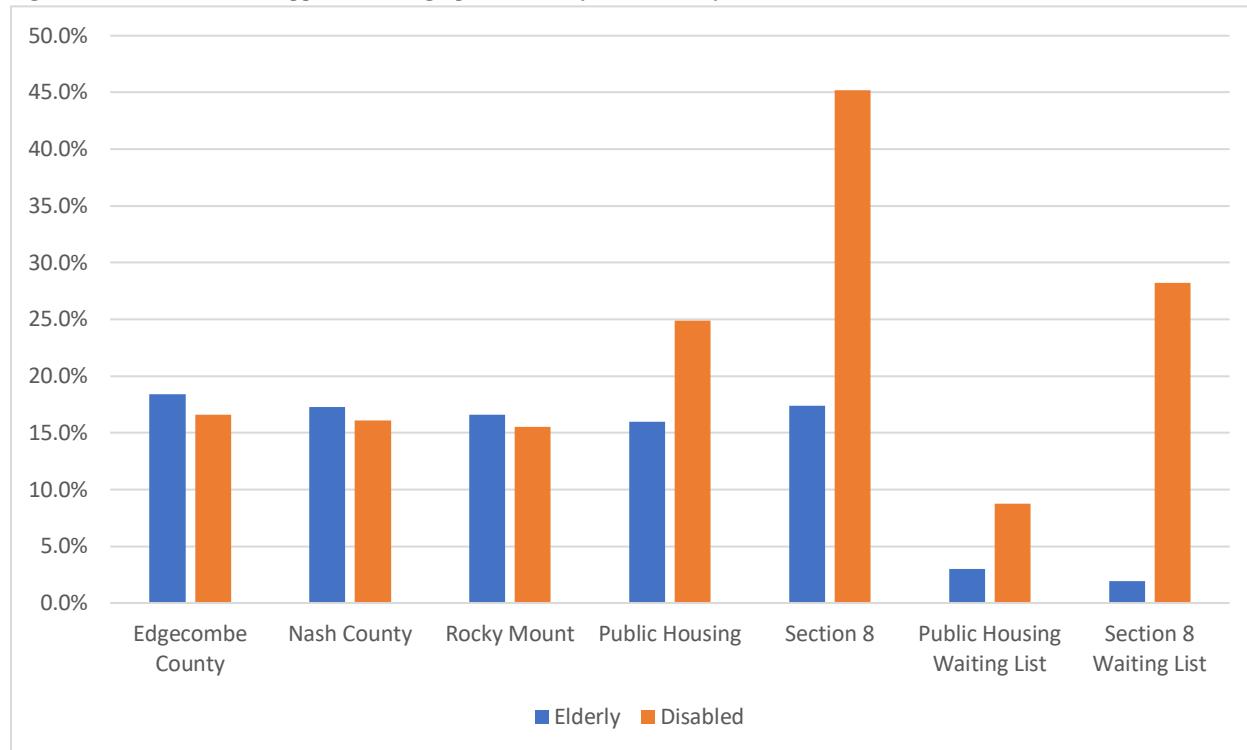
Figure 1 RMHA Tenant and Applicant Demographics – Race/Ethnicity



Source: Rocky Mount Housing Authority

The same is also true for disabled tenants of assisted housing. Households with an individual with a disability are disproportionately represented as tenants of public housing and HCV holders. The Section 8 waiting list also shows a high proportion of applicants with a disability. Conversely, the public housing waiting lists shows lower rates of representation for these populations.

Figure 2 RMHA Tenant and Applicant Demographics – Elderly and Disability Status



Source: Rocky Mount Housing Authority

The higher representation of protected classes in the HCV waiting list indicates a lack of affordable housing options for these households in the private market. While RMHA cannot completely meet the demand for housing for these populations, the lower rate of elderly and disabled households in their waiting lists indicate an effort to affirmatively further fair housing.

Evaluation of City's and Consortium's Current Fair Housing Legal Status

Rocky Mount residents can receive fair housing services from the Rocky Mount Human Relations Commission, HUD, the North Carolina Human Relations Commission, The Fair Housing Project of Legal Aid of North Carolina and several local human relations commissions serving specific jurisdictions. This section summarizes the fair housing organizations and analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made.

Fair Housing Statutes

Federal Statutes

Several federal statutes protect people from housing discrimination or from being denied participation in federally funded programs. These include:

- The federal **Fair Housing Act** protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.
- Title VI of the **Civil Rights Act** of 1964 provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Title VI applies to programs or activities receiving federal financial assistance from HUD.
- Section 504 of the **Rehabilitation Act** of 1973 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. Titles II and III of the Americans with Disabilities Act prohibit discrimination on the basis of disability in all programs, services, and activities of public entities and by private entities that own, operate, or lease places of public accommodation.
- Title I of Section 109 of the **Housing and Community Development Act** of 1974 prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Community Development Block Grant (CDBG) programs or activities.

State Statute

The North Carolina State Fair Housing Act (Chapter 41A of the North Carolina General Statutes) makes it unlawful to discriminate against any person in a real estate transaction because of race, color, religion, sex, national origin, handicapping condition, or familial status. The State also prohibits discrimination in the siting of residential development containing affordable housing units.

City Statute

The City of Rocky Mount adopted a Fair Housing Ordinance in August 2010. It does not provide additional protections beyond those described in the federal Fair Housing Act. The ordinance is enforced by the City's Human Relations Commission.

Fair Housing Entities

U.S. Department of Housing & Urban Development

The Office of Fair Housing & Equal Opportunity (FHEO) of HUD administers federal laws and establishes national policies to ensure that all Americans have equal access to the housing of their choice. Housing discrimination complaints filed with HUD may be referred to the North Carolina Human Relations Commission for investigation.

North Carolina Human Relations Commission

The North Carolina Human Relations Commission is a “substantially equivalent agency” under HUD’s Fair Housing Assistance Program (FHAP). This means that NCHRC has been certified as substantially equivalent after HUD determined that the Commission administers a law (i.e., the North Carolina State Fair Housing Act) which provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD refers complaints of housing discrimination that it receives from North Carolinians to NCHRC for investigation.

As a FHAP agency, the Commission receives grant funding from HUD to assist in the enforcement of the federal Fair Housing Act. The Commission also receives some financial and operational assistance from FHEO to enforce the State Fair Housing Act.

The Fair Housing Project of Legal Aid of North Carolina

The Fair Housing Project is a grantee under HUD’s Fair Housing Initiatives Program (FHIP) and provides the following services across the State:

- Education and outreach on fair housing issues to residents, advocates and service providers
- Legal representation to persons who have been discriminated against
- Conducting research into fair housing and predatory lending, and
- Conducting fair housing testing to determine possible discrimination based on race, disability, familial status, and other grounds.

As a FHIP agency, the Fair Housing Project receives grant funding from HUD to carry out its activities.

City of Rocky Mount Human Relations Department

The Human Relations Department serves to create “an atmosphere that is free of discrimination and conflicts between people based on race, sex, age, ethnic or national origin, religion or socio-economic status.” The commission serves to investigate complaints of discrimination and

promote programs to ensure equal opportunity for all residents. Commissions within the department include:

- The Human Relations Commission –promotes understanding, respect and harmony among all people
- The Martin Luther King, Jr. Commission – organizes programs and activities that honor the legacy of Dr. Martin Luther King, Jr. to promote unity among our diverse population within the Rocky Mount Community.
- Mayor’s Commission on Persons with Disabilities - create community awareness; expand social, economic, and professional opportunities; and enhance the quality of life for persons with disabilities
- Rocky Mount Area Youth Council – a forum for area high school students in grades 9 through 12 to identify and address youth related issues and problems.
- Neighborhood Associations – local associations that regularly meet to discuss concerns and face challenges that are common to most neighborhoods, such as transportation, neighborhood beautification, crime, zoning, recreation, housing, lead abatement, problem landlords, street lighting, health care, and special concerns for youth and senior citizens. Presidents of these associations take these concerns to city staff to voice concerns and receive information about city services.

Existence of Housing Discrimination Complaints

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

This section analyzes housing discrimination complaints filed with HUD by North Carolinians between January 2015 and July 2020. Many of the HUD complaints may have been referred to the Human Relations Commission or the Fair Housing Project.

Between January 2015 and July 2020, only 3 cases in Edgecombe County were filed. No cases were filed in Nash County. Of these cases, two cases alleged discrimination based on disability and one based on race. According to the National Fair Housing Alliance’s 2020 report, *Fair Housing in Jeopardy: Trump Administration Undermines Critical Tools for Achieving Racial Equity*, complaints by persons with disabilities represented the majority (58.9%) of cases filed nationally in 2019.

Public Sector Policy Review

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in North Carolina to determine opportunities for furthering the expansion of fair housing choice.

Key Findings

- The City of Rocky Mount has four plans that serve as a basis for advocating for expanding housing choices and improving conditions, three of which were implemented after the previous AI.
- The City of Rocky Mount's Zoning Ordinance is at low-risk relative to discriminatory provisions for housing and members of the protected classes. The only potential risk of discriminatory practices is the limit on the number of unrelated individuals to be considered family to under five people.
- Relaxation of the City's accessory dwelling unit (ADU) policy has the potential to supply affordable housing due to lower land and construction costs.
- The City of Rocky Mount's Language Access Plan had been updated in July 2020. This includes identifying provisions and services for LEP Spanish-speakers.
- HMDA data indicates that Black and Hispanic applicants faced higher denial rates and lower origination rates (approvals) than white applicants.

Planning Documents

This section will review local planning initiatives as it relates to affordable housing, desegregation, elimination of poverty, and fair housing policies established since the previous AI was established. The City of Rocky Mount has four plans that advocate for expanding housing choices and improving conditions for LMI and special needs residents through renovation, rehabilitation, and multimodal development.

Crossroads to Prosperity Housing Report

The Crossroads to Prosperity Housing Report was published in December 2014. While it was established before the previous AI, it serves as the basis for plans developed in the future by identifying targeted areas of opportunity and potential redevelopment initiatives the City of Rocky Mount should consider.

Targeted Areas of Opportunity (TAOs)

The report identifies 14 neighborhoods with the highest need for investment and revitalization. These neighborhoods are centered around downtown Rocky Mount and suffer from high vacancy, blight, and disinvestment. However, there are a number of assets these neighborhoods can leverage to use as a foundation for revitalization, including proximity to employment centers, the commercial district, and good access to the Tar River Transit bus service. The report recommends focusing resources on housing rehabilitation, infill development, and dense multi-family developments to attract new residents and investment opportunities.

Redevelopment Initiatives

Several redevelopment initiatives related to creating and maintaining housing were identified in the report:

- Establishing a targeted workforce housing initiative by having employers assist employees in buying or renting homes close to work or public transit, the City of Rocky Mount could assist existing businesses by attracting and maintaining new talent, fill in vacant properties with housing, and attract new investment in the future.
- Pursue enhanced weatherization initiative, leveraging federal grants to improve environmental health and safety in low-income homes and mitigating utility costs.
- Establishing a property tax abatement for renovation of existing commercial structures and owner-occupied residences
- Financing single-family homes with tax credits thorough programs such as LIHTC
- Work with institutional and investors and private equity
- Instituting a lease purchase program to assist prospective homebuyers with limited financial resources.
- Promote infill development, rehab, and weatherization
- Establish owner-occupied and purchase rehab programs
- Utilize modular construction options to produce more affordable housing on many of the City's vacant lots

Atlantic-Arlington Corridor Land Use Study

The Atlantic-Arlington Corridor Land Use Study was commissioned in 2019 to combat and mitigate potentially hazardous impacts of unprecedeted economic growth and investment in the area. The area is primarily located on the eastern half of downtown Rocky Mount and has a high concentration of minorities, low- to moderate-income residents, and minority- and women-

owned businesses. The plan identifies the following as the high priorities for the area as it relates to housing.

Preserving cultural history and heritage & maintaining the overall form of the existing built environment

While the area sees the economic growth in downtown Rocky Mount as a great boon for the area, there is also a strong desire to maintain the identity of the area. Many of the recommendations in the plan address this focus. Gateway enhancements through signage and public art along with establishing a heritage trail and historic markers help preserve the history of the area and establish a clear identity. Current vacant areas have high potential for development; key stakeholders should be consulted with to determine use of vacant site and identify the challenges to developing it.

Ensuring housing affordability and choices for all residents

New residential development should consider not only maintaining traditionally residential areas but also diversify existing land use. Diverse land use allows for efficient access overall lower personal costs for residents living in the area. Improved code enforcement was also identified as a method for maintaining existing affordable housing.

Connect neighborhoods with the economic growth occurring downtown

Recommendations were made for multimodal transportation options improving access and connectivity for pedestrians, cyclists, public transit, and other vehicles serve to efficiently improve access to vital services and community facilities for Rocky Mount residents. Additionally, access to the Atlantic-Arlington Corridor could be improved by promoting and improving public facilities and infrastructure. New transit links in the form of new and improved bus routes, bike lanes, and sidewalks, an improved park system, along with removing barriers for persons with disabilities can help better connect downtown to adjacent neighborhoods.

Southeast Rocky Mount and Around the Wye Redevelopment Vision

The Southeast Rocky Mount and Around the Wye Redevelopment Vision was developed in October 2019 to improve the neighborhood's housing conditions for current residents while bringing in viable new construction to reduce vacancy and the overall blight of the neighborhood. The neighborhood primarily consists of multifamily housing and packets of commercial districts. The plan looks to expand the commercial and residential districts by converting land that is currently used for manufacturing and related industries.

Planned actions include public infrastructure improvements to street lighting, roads, sidewalks, and transit facilities along with acquisition of vacant properties in the area. Acquisition will be conducted by the Redevelopment Commission of the City of Rocky Mount and purchased fair market value or through donation in the case of abandoned or neglected properties. The Commission will also prepare an RFP for developers to construct housing at low or no cost. Once construction of housing is complete, the developer will be responsible for marketing the sale of the home to qualified buyers while the Commission works with local lending partners to ensure qualified home buyers can purchase the homes. The minimum number of newly constructed homes dedicated for homeowners at or below 80% AMI is still to be determined.

Senior housing, existing business support, and new business recruitment also serve a vital role for revitalizing the neighborhood.

The plan currently defines only the first of four phases in the plan. Phase I intends to fully rehabilitate three single-family housing units. These homes must be within the redevelopment area, owner-occupied, and the householder must earn at or below 80% AMI.

Zoning

This section reviews the City of Rocky Mount's zoning process from an administrative and policy standpoint that may impact protected classes and their access to housing. *The City of Rocky Mount's Zoning Ordinance is at low-risk relative to discriminatory provisions for housing and members of the protected classes.* The only potential risk of discriminatory practices is the limit on the number of unrelated individuals to be considered family to under five people.

Zoning Risk Assessment

The zoning code for the City of Rocky Mount was evaluated based on how the ordinance:

- Defines “family” inclusively, without a cap on the number of unrelated persons and with a focus on functioning as a single housekeeping unit
- Defines “group home” for persons with disabilities or similarly named land use compared to single family dwellings
- Allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing
- Regulates the siting of group homes as single-family dwelling units without an additional regulatory provision
- Has a “Reasonable Accommodation” provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions
- Permits multi-family housing of more than 4 units per structure in one or more residential zoning districts by-right
- Does not distinguish between “affordable housing/multi-family housing” (i.e. financed with public funds) and “multi-family housing” (i.e. financed with private funds)
- Does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts
- Permits manufactured and modular housing on single lots like single family dwelling units
- Provides residential zoning districts with minimum lot sizes of $\frac{1}{4}$ acre or less
- Does not include exterior design/aesthetic standards for all single-family dwelling units regardless of size, location, or zoning district

Scoring: 1 – low risk for discrimination 2 – high risk for discrimination

Zoning Ordinance Regulatory Provision			Score
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit <i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i>	Yes (1)	No (2)	2
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	Yes (1)	No (2)	1
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or public hearing	Yes (1)	No (2)	1
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes (1)	No (2)	1
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	Yes (1)	No (2)	1
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	Yes (1)	No (2)	1
7. Ordinance does not distinguish between “affordable housing / multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed without any public funds)	Yes (1)	No (2)	1
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing or permanent supportive housing facilities exclusively to non-residential zoning districts	Yes (1)	No (2)	1
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes (1)	No (2)	1
10. Ordinance provides residential zoning districts with minimum lot sizes of $\frac{1}{4}$ acre or less	Yes (1)	No (2)	1
TOTAL SCORE			11

11-12: Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

13-14: Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

15 and higher: Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Date of Ordinance

In general, the older the zoning ordinance, the less effective it could be as older zoning ordinances may not have evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes. The City of Rocky Mount's Zoning Ordinance was amended as recently as January 8, 2020.

Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes that limit their housing choice. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. The restrictions from the cap can impede the development of group homes, effectively impeding housing choice for the disabled. Caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

In Rocky Mount, a family is defined as “one (1) or more persons related by blood, adoption or marriage, or a group of not more than five (5) persons not related by blood, adoption or marriage occupying a premise and living together as a single nonprofit housekeeping group in a dwelling unit as distinguished from a group occupying a hotel, club or similar dwelling for group use.” This definition is inclusionary in terms of allowing unrelated individuals to operate as a single household unit. However, placing limitations on the number of unrelated persons who can live as a family unit may be discriminatory against persons or groups in circumstances that do not allow them to meet these conditions, such as financial burden or disabilities.

Group homes

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use for persons without disabilities. Of concern are those that serve members of the protected classes such as people with disabilities. Because a group home for people with disabilities, as defined by the federal Fair Housing Act, serves to provide a non-institutional experience for its occupants, imposing additional and burdensome conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes, restrict housing choice for persons with disabilities, and are inconsistent with the Fair Housing Act.

According to the City's zoning ordinance, group homes are defined as “homes with support and supervisory personnel that provides room and board, personal care and habilitation services in a family environment for two (2) to nine (9) adults who are developmentally disabled and who have or can develop self-help skills, are ambulatory, and are able to participate in activities in the community. Other than the supportive services, group homes are similarly defined as family households. They may house two to nine unrelated persons and are allowed in all residential zones by right. The City of Rocky Mount affirmatively furthers fair housing choice for individuals with special needs through their inclusive definition and land use for group homes.

Manufactured Homes

Adopting an inclusive definition of a mobile home as a single-family dwelling encourages a varied housing stock, advancing choice. Defining the use differently or restricting its location to areas other than those where stick-built single-family housing is permitted does not specifically impede housing choice by members of the protected classes. However, there is a correlation between low-income households and members of the protected classes. By limiting a low-cost housing option, restrictions on mobile homes may disproportionately impact members of the protected classes.

The zoning ordinance defines mobile/manufactured homes as follows:

A relocatable living unit manufactured off-site and transported, on an independent carrier unit, to a permanent site that has been constructed in accordance with an "engineering bulletin" issued by the Office of Technical Standards, Department of Housing and Urban Development, Washington, D.C. A single-family home constructed in accordance with the standards set forth in the North Carolina State Building Code and composed of components substantially assembled in a manufacturing plant and transported to the site for final assembly on a permanent foundation.

Under Sec. 501. - Zoning use classifications, mobile and manufactured homes are permitted by right in single-family residential lots in agricultural districts (A-1), medium density manufactured and single-family residential districts (R-8), and manufactured home park districts. Exceptions are provided in case of hardship, such as if the occupant of the manufactured home is physically or financially dependent on someone residing in an adjacent dwelling house. The manufactured home must abide by reasonable living standards and have the applicable health, sanitation, foundation, and utilities to make it habitable.

Permitted Residential Lot Sizes and Types

A lack of affordable housing may impede housing choice by members of the protected class as members of the protected classes are often also in low-income households. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. The City of Rocky Mount has a wide variety of lot sizes available in its residential zones, with nearly all residential zones permitting dwellings on less than $\frac{1}{4}$ acre in lot size. Only agricultural and very low-density residential districts require lots larger than $\frac{1}{4}$ acre.

Like excessively large lots, restrictive forms of land use that exclude any form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes. Residential zones in Rocky Mount range from agricultural and low-density districts to dense districts for multifamily dwelling units. As previously mentioned, special needs housing such as shelters, group homes, and family care homes, are permitted in all residential districts by right. Additionally, the ordinance makes no distinction between affordable, assisted housing and market-rate units. As a result, there is little discriminatory risk in housing choice in Rocky Mount as it relates to lot sizes and special circumstances.

Building, Occupancy, Health and Safety Codes

The City of Rocky Mount adopted the North Carolina State Building Code, General Construction, Accessibility and Existing Buildings in 2002 as reference for safe and stable design, methods of construction, minimum standards, and use of materials in building or structures hereafter erected, enlarged, altered, repaired or otherwise constructed or reconstructed.

Accessible design and construction requirements are necessary to make public and common use spaces and facilities accessible and safe to everyone. This gives people with disabilities greater freedom of choice to choose where they live. The Fair Housing Act requires all “covered multifamily dwellings” to be accessible to and usable by people with disabilities. Here, covered multifamily dwellings are defined as buildings containing four or more units, either with all ground floor units or at least one elevator. The following seven accessibility standards are required by the Fair Housing Act for these dwelling units:

- An accessible building entrance on an accessible route.
- Accessible common and public use areas
- Usable doors (usable by a person in a wheelchair)
- Accessible route into and through the dwelling unit
- Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations
- Reinforced walls in bathrooms for later installation of grab bars
- Usable kitchens and bathrooms

Additionally, it is unlawful to refuse to make reasonable accommodations that allow for a person with a disability equal opportunity to use and enjoy their home.

Building design and construction standards in North Carolina more than adequately implements accessible measures for people with disabilities by utilizing the North Carolina Building Code, which also incorporates International Building Code 2015, for their construction, rehabilitation, and maintenance regulations. State building regulations were last updated in 2018. Chapter 11 determines the design and construction of facilities for accessibility for individuals with disabilities. These standards almost meet all the accessibility requirements outlined by the Fair Housing Act. While all toilet and bathing facilities are required to be accessible, there is not a clear provision for requiring reinforced walls in bathrooms for later installation of grab bars. Section 1104 and 1105 details requirements for accessible routes entrances, including access to common and public use areas. At least one accessible route within the site shall be provided from public transportation stops, accessible parking, accessible passenger loading zones, and public streets or sidewalks to the accessible building entrance served. The minimum width of the accessible path must be 48 inches minimum. Accessible routes are required within and between almost all sites, including commercial buildings with five or more tenants, healthcare providers, transportation facilities, airports, and any government building. Exceptions to providing accessible routes are provided if the site does not provide any pedestrian access or if the area of a floor or mezzanine is below 3,000 square feet. Recreational facilities must also provide accessible features to all spaces except for swimming pools.

Section 1107 describes accessibility requirements for dwelling units and sleeping units. All public spaces serving dwelling units shall be accessible, including bathrooms, kitchens, living

and dining areas, and any connected exterior spaces. The following table describes the minimum required number of accessible units and features required based on the number of dwelling units a building provides:

Table 20 Accessible Dwelling Unit and Sleeping Unit Requirements in North Carolina

Total number of units provided	Minimum required number of accessible units without roll-in showers	Minimum number of accessible units with roll-in showers	Total number of required accessible units
1 to 25	1	0	1
26 to 50	2	0	2
51 to 75	3	1	4
76 to 100	4	1	5
101 to 150	5	2	7
151 to 200	6	2	8
201 to 300	7	3	10
301 to 400	8	4	12
401 to 500	9	4	13
501 to 1,000	2% of total	1% of total	3% of total
Over 1,000	20, plus 1 for each 100, or fraction thereof, over 1,000	10, plus 1 for each 100, or fraction thereof, over 1,000	300, plus 2 for each 100, or fraction thereof, over 1,000

Source: 2018 North Carolina Building Code

General exceptions to providing accessible units include structures without elevator services for units on upper floors, site impracticality (e.g., high grade slopes), or structures where the lowest floor of a building without elevator service are at or above design flood elevation.

Section 1109.13 describes controls, operating mechanisms, and hardware such as switches that control lighting and ventilation and electrical convenience outlets. These features are required to be accessible with some exception:

- If the operable parts are intended for use only by service or maintenance personnel
- Receptacles serving a dedicated use Where two or more outlets are provided in a kitchen above a length of countertop that is uninterrupted by a sink or appliance, one outlet shall not be required to be accessible.
- Floor electrical receptables
- HVAC diffusers
- For redundant light switches, one control is not required to be accessible
- Access doors or gates in barrier walls and fences protecting pools, spas and hot tubs
- Section 1109.2 requires toilet room and bathing rooms to be accessible. Exceptions to providing accessible bathrooms include:
 - Toilet rooms or bathing rooms accessed only through a private office, not for common or public use and intended for use by a single occupant
 - Where multiple single-user toilet rooms or bathing rooms are clustered at a single location, at least 50 percent must be accessible
 - Where no more than one urinal is provided in a toilet room or bathing room, the urinal is not required to be accessible.

- Toilet rooms or bathing rooms that are part of critical care or intensive care patient sleeping rooms serving accessible units are not required to be accessible.

While it may be implied, there is not a clear requirement for providing reinforced walls for reasonable accommodation installations. Clarity on reasonable accommodation requirements may provide greater housing opportunities for persons with disabilities.

Anti-Displacement Plan and Relocation Plan

Anti-displacement and Relocation Plans serve to advance the interests of lower-income individuals and households at risk of displacement due to neighborhood changes in various sectors, such as housing, businesses, and infrastructure. The replacement plan is compliant with HUD regulation 24 CFR § 42 and 24 CFR § 570 outlining plans and strategies for addressing displacement. As a recipient of CDBG, HOME, and NSP funds, the City of Rocky Mount has a residential anti-displacement and relocation assistance plan in place for 2020 demolition and acquisition activities.

The plan makes clear that the City will identify the reasonable steps to minimize the displacement of persons from their homes as a result of an assisted project. Notice of Relocation will be provided by certified mail or hand delivered. Terms of the relocation assistance will be discussed via a personal interview for all cases and be documented. A list of the brochures which will be made available for investor-owners, owner-occupants, and tenant households in the redevelopment area include the following:

- HUD-1041-CPD, "When a Public Agency Acquires Your Property"
- HUD-1044-CPD, "Relocation Assistance to Displaced Homeowner Occupants"
- HUD-1365-CPD, "Relocation Assistance to Persons Displaced from Their Homes"
- HUD-1042-CPD, "Relocation Assistance to Displaced Tenants"

All low/moderate-income dwellings that are converted or demolished will be replaced and displaced households will be appropriately relocated. All replacement housing units will maintain an affordability period of no fewer than three years and comply with HOME and CDBG guidelines.

In accordance with 24 CFR § 42.350, relocation assistance for eligible individuals and households are limited to moving expenses, homeowner replacement housing payment, or tenant replacement housing payment in the form of rental assistance or down payment assistance. Comparable replacement dwellings are clearly defined regarding environmental conditions and location in respect to public services, utilities, and place of employment.

Contacts for complaints and appeals related to eligibility for assistance due to displacement are clearly outlined along with the appropriate procedures. Any person who believes he/she has been displaced for a federally assisted project may file a written appeal with the City. The City will accept appeals that are received within sixty days after the City's determination on a person's claim. Promptly following receipt of all information submitted by a person in support of an appeal, the City shall make a written determination on the appeal, including an explanation of the basis on which the decision was made, and furnish the person a copy. If the full relief is not granted, the City shall advise the person of his or her right to seek judicial review of the decision. If the displaced person is still not in agreement with the determination, the City may direct the person to the local HUD Office of Community Planning and Development.

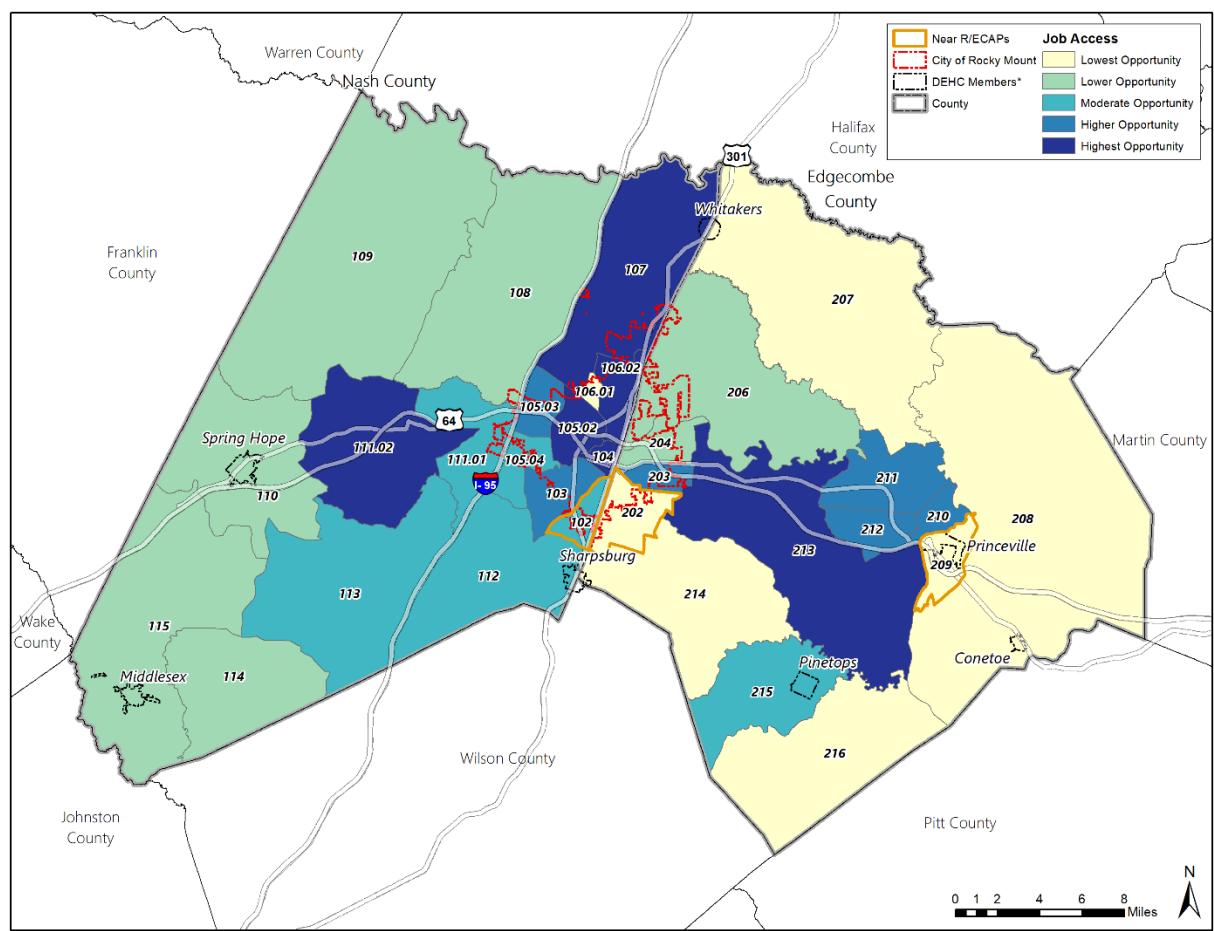
Employment Opportunities

The United States Office of Management and Budget delineates metropolitan statistical areas as a core area containing a substantial population of at least one urbanized area of 50,000 or more inhabitants and having high levels of economic and social integration. As a result, commuting and employment opportunities are best observed at the regional level. The entirety of Edgecombe and Nash Counties is considered the Rocky Mount Metropolitan Statistical Area.

Areas with high employment opportunities tend to be located along major traffic corridors, such as the I-95 and US 301, and more developed areas such as the City of Rocky Mount, Nashville, and Tarboro. The expansion of existing employers, such as Sara Lee Frozen Bakery in Tarboro and new employers such as Armorock and Wolf and Flow X-Ray in the region, indicate that these employment centers are expected to continue growing. However, it is important to note that Near R/ECAPs have very low job opportunities compared to the rest of the region. While they are adjacent to many of the high job opportunity areas, low-income residents without a personal vehicle would have difficulty accessing these jobs. Public transit is limited to the City of Rocky Mount and its western suburbs. Attracting new investment to these areas to place housing closer to centers of employment or expanding public transit routes may improve job outcomes for these neighborhoods.

However, it is important to note that job quality is not measured; the job access index included here only captures the quantity of jobs and workers. Job quality is a complex and multifaceted concept that can include a variety of factors weighted differently by individual preferences, including pay and benefits, job security, health and safety, work-life balance, and more. The Rocky Mount metropolitan area's largest employers are based on manufacturing, healthcare, and education. As a result, there is a need for both entry-level positions and higher skilled workers. Growth in these sectors allow for additional job opportunities for low- and moderate-income households while also serving to attract higher skilled labor from outside the region.

Map 27 Job Access in Edgecombe and Nash Counties



*Edgecombe County and the City of Rocky Mount are also Down East HOME Consortium (DEHC) member jurisdictions

Source: LEHD

Language Access Plan

To improve public safety, health, convenience, comfort, and general welfare of all residents, a language access plan is necessary for individuals who are non-English speaking or have limited English proficiency (LEP) to access available services. Procedures for providing language assistance to LEP residents were analyzed for the City's Language Access Plan, effective as of July 1, 2020. The plan identifies a clear point of contact via in-person and by phone for questions and complaints for LEP-related services.

The LAP makes clear that interpretation and translation services are available to LEP residents free of charge, specifically for Spanish speakers. While the plan does not detail the four-factor analysis, ACS data shows that the LEP Spanish-speaking population is approaching the safe harbor threshold (5% of the population or 1,000 people). Location of physical signs translated into Spanish are listed along with the provision of newspaper ads, electronic media, and pamphlets for vital services such as housing needs. LEP individuals with a primary language other than Spanish will be informed of the right of oral translation and written notices in their own language upon contact. By ensuring that LEP services are already being provided by the City, meaningful access to public services can be provided to these populations. The standards for the interpreters are clearly outlined along with the assurance of confirming the competency of bilingual staff and interpreters. This is in line with action plan of the previous AI to work with Hispanic stakeholders to identify provisions for LEP Spanish-speakers.

The LAP details procedures for training employees on providing language assistance along with reporting and monitoring procedures to the North Carolina Department of Commerce. Training is to be provided by the Human Resources Department for staff and contractors on the language access policy and related federal requirements. The City leverages interagency staff capable of providing bilingual services to assist in providing language assistance at all levels of interaction. LEP persons may decline interpretation and translation services and use a family member or friend as long as it is believed that the effectiveness of services received is not compromised or would affect the LEP person's confidentiality.

Explicitly including the four-factor analysis in the plan can help make transparent the necessity of LEP services for certain LEP populations in the City, such as those for the LEP Spanish-speaking population. Additionally, outlining the nature and importance of the services the City can provide and level of contact with LEP populations for public services may help identify specific areas and services for providing more efficient program delivery. As the LAP develops through monitoring and documentation of contact with LEP persons, the plan can be further refined.

Private Sector Policy Review

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing and advertising of real estate. In this section of the AI, mortgage lending practices, high-cost lending and real estate advertising are analyzed.

Home Mortgage Lending

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for Rocky Mount, Edgecombe County, and Nash County is from 2017 to 2019. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. ***The data indicates that Black and Hispanic applicants faced higher denial rates and lower origination rates (approvals) than white applicants.*** Denial rates for Blacks and Hispanics were 42.2% and 57.7%, respectively, while denial rates for whites were 21.2%. The overall denial rate in the Twin Counties area is 29.8%.

Table 21 Mortgage application outcomes by race/ethnicity in Rocky Mount, 2017-2019

	White		Black		Asian		Other		Hispanic		Total	
	#	%	#	%	#	%	#	%	#	%	#	%
Approved	4,212	78.8%	1,987	57.8%	62	77.5%	958	67.5%	202	42.3%	7,219	70.2%
Denied	1,136	21.2%	1,448	42.2%	18	22.5%	461	32.5%	276	57.7%	3,063	29.8%
Total	5,348	-	3,435	-	80	-	1,419	-	478	-	10,282	-

Source: FFIEC HMDA

Table 22 Rate of high cost loan originations by race/ethnicity, 2017-2019

	White		Black		Asian		Other		Hispanic		Total	
	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	5,839	99.93%	3,926	99.97%	89	100.00%	1,854	100.00%	426	99.77%	11,708	99.96%
High cost	4	0.07%	1	0.03%	-	0.00%	-	0.00%	1	0.23%	5	0.04%
Total	5,843	-	3,927	-	89	-	1,854	-	427	-	11,713	-

Source: FFIEC HMDA

Table 23 High cost loan originations by income level by race, 2017-2019

	White		Black		Hispanic		Total	
	#	%	#	%	#	%	#	%
High Cost Loans Originated	4	0.07%	1	0.03%	1	0.23%	5	0.04%
Applicant Income Above AMI	3	75.00%	0	0.00%	0	0.00%	3	60.00%
Applicant Income Below AMI	1	25.00%	1	100.00%	1	100.00%	2	40.00%

Source: FFIEC HMDA

High-Cost Lending Practices

The widespread housing finance market crisis of 2007-2009 brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, increased the availability of credit to low-income persons. At the same time, subprime lending often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

Originations of high-cost loans show differences by race and ethnicity. However, the small sample size makes it difficult to infer if these groups are disproportionately impacted by high-cost loans. The overall rate of high-cost loan originations between 2017 and 2019 was low in Nash and Edgecombe Counties; only 0.04% of originated loans were high-cost loans. Rates of high-cost loans were also low across race and ethnicity.

When considering income, there appears to similar rates of high-cost loans for recipients above and below area median income across the state. However, when broken down by race and ethnicity, Black and Hispanic applicants with incomes below AMI had much higher rates of high-cost loans. However, it is once again important to emphasize that the sample size of high-cost loan originations is incredibly small to make clear determinations on disproportionate impact based on income levels.

Impediments & Conclusions

Based on the analysis conducted in this AI, the following impediments to fair housing choice were identified. These potential impediments are linked to the remedial strategies in the Fair Housing Action Plan.

Lower employment rates and wages for certain members of the protected classes reduce housing choice.

- Members of the protected classes tend to have lower incomes and higher unemployment rates than their counterparts. Persons with disabilities participate in the labor force at lower rates than persons without disabilities. While fair housing and affordable housing are distinct from each other, there is a link when affordable housing is not located throughout a jurisdiction, including in higher opportunity areas, housing choice is restricted.
- The housing stock tends to be deteriorating and in need of rehabilitation, particularly among the more affordable units.

Limited housing choice results in Housing Choice Voucher (HCV) concentration in primarily in older, less expensive communities, including the Near R/ECAP in Rocky Mount.

- The mapped locations of HCV holders indicate that voucher holders tend to find units in southern Rocky Mount, which overall has lower access to opportunities than other sections of the City or in Nash County.
- The high representation of protected classes, particularly persons with disabilities, in the HCV waiting list may indicate a lack of affordable housing options for these households in the private market.
- In Rocky Mount, older units built prior to 1978 are located throughout the City including in the Near R/ECAP. Units built prior to 1978 are likely to have lead paint, which poses a health risk to occupants, particularly those who are not yet school-aged.

Non-white households were less likely to be homeowners and are more likely to have been denied a mortgage or offered a high-cost loan than white households.

- Homeownership has historically been a way for a family to create generational wealth, which allows those families additional opportunities such as accessing equity to pay for higher education or start a business. Increasing homeownership rates among members of the protected classes can assist in wealth-building.
- Black and Hispanic mortgage applicants are denied at higher rates and, when adjusted for income, non-whites are offered high-cost loans more often than their white counterparts. However, the sample size is small in the high-cost loan analysis so those results are not conclusive.

Moderate levels of segregation exist in Edgecombe County and Rocky Mount and members of the protected classes are more likely to live in the Near R/ECAPs.

- Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing. The analysis showed that members of the protected classes tended to have higher rates of poverty and are more likely to reside in Near R/ECAPs as housing is more affordable there than in other areas.

A lack of available transportation in areas outside of Rocky Mount leaves residents dependent on private vehicles which disproportionately affects members of the protected classes from accessing opportunities such as job centers located outside of city limits.

- While transportation exists within the City of Rocky Mount, residents without access to a private vehicle have difficulty accessing resources located outside of city limits. Identifying community assets such as potential partnerships between developers and employers to create workforce housing near job centers or re-evaluation of current transit routes could assist Twin Counties residents in accessing those employment locations. Unemployment is higher in the City than in the counties.

While the City of Rocky Mount has an existing zoning policy on ADUs that permits them in all residential districts by right, only the property owner, family members, or potential caregivers employed on the premises can use it.

- ADUs have the potential to supply affordable housing due to lower land and construction costs. Additionally, ADUs can be integrated into the surrounding neighborhood by design to maintain community character. While the City of Rocky Mount has an existing policy on ADUs that permits them in all residential districts by right, only the property owner, family members, or potential caregivers employed on the premises can use it. Guests are limited to six months in any year to use the ADU. Eliminating or reducing these limitations could increase the supply of affordable housing in Rocky Mount.

Goals and Actions to Address Impediments

Goal	Actions	Timeframe and Metrics	Responsible Entity
Goal 1: Expand housing choice and access to opportunity	Continue to provide HOME and CDBG assistance for housing rehabilitation and new construction, as applicable, including the facilitation of contractor workshops. Give priority to projects that improve fair housing choice and access to opportunity for members of the protected classes, such as LIHTC developments and supportive housing in high opportunity areas. This includes mixed-income developments that will increase the tax base, benefitting school districts and stimulating private development.	On-going Acquisition 3yrs Contractor Meeting 6 months	CBD Dept
	Continue providing CDBG assistance for public facility and infrastructure accessibility improvements, giving priority to projects in R/ECAPs.	Ongoing	CBD Dept Subrecipients
	Complete the analysis to determine which areas meet the criteria to be designated as a Neighborhood Revitalization Strategy Area (NRSA) to take advantage of the more flexible HUD regulations associated with the designation. If the eligible areas overlap with other planning districts, coordinate redevelopment and investments to leverage funds.	3-5 Years	CBD Dept Development Services Budget & Elevation Dept
	Work with the housing authorities and other affordable housing providers to develop a cohesive, regional guide to affordable housing options in the region that is updated on an annual basis. A starting point is the Assisted Inventory list provided in this AI.	Ongoing	CBD Dept Subrecipients Developers Certified CHDOs
	Continue to provide CDBG funding to non-profits who provide career readiness, job training, and other educational programs targeted towards low-income individuals and members of the protected classes.	Ongoing	CBD Dept Subrecipients
	Identify any key community asset or major employer currently underserved by transit service and initiate discussions to determine the feasibility to altering the transit route, recognizing that this could rely on regional coordination if Rocky Mount begins to provide transit outside of city limits.	Ongoing	Workforce Advisory Commission? Tar River Transit CBD Dept
	The City of Rocky Mount should complete the cost-benefit analysis of the following community revitalization strategies and share the conclusions with the public: general obligation bond for affordable housing rehabilitation, construction, and homeownership assistance; inclusionary zoning and affordable housing set-asides; multi-family tax abatements; and equitable code enforcement.	Ongoing 6 months-1 yr	CBD Dept Budget & Evaluation Dept

Goal	Actions	Timeframe and Metrics	Responsible Entity
	Begin to implement any community revitalization strategies determined to be feasible through the completed cost-benefit analysis.	Ongoing 6months-1yr	CBD Dept Budget Analyst & Elevation Dept
	Assess the development review process to identify opportunities for improved efficiency, expediency, and coordination.	Ongoing	Development Services CBD Dept
	Work with planning staff to focus demolition efforts in a specific, equitable manner as ordered by City Council.	Ongoing	CBD Dept Development Services
	Work with planning staff to examine the feasibility of developing a vacant property registration ordinance and a rental registration ordinance in the City of Rocky Mount.	Completed - Not feasible due to changes in state legislation	Development Services CBD Dept
	Work with planning staff to examine the feasibility of establishing a rental registration ordinance in the City of Rocky Mount.	Completed - Not feasible due to changes in state legislation	Development Services CBD Dept
	Work with planning staff change existing standards to allow for relaxed minimum lot size standards and setbacks to promote reuse of vacant lots in the City of Rocky Mount.	Ongoing	Development Services
	Continue to engage with Community Academy to monitor real estate activities and to help prevent displacement while encouraging equitable development in neighborhoods.	Ongoing	Development Services CBD Dept
	Conduct an analysis of the Housing Rehab Matching Rehab program funded to determine the extent to which the program furthers fair housing and make adjustments, if necessary. Included in the analysis are policies and procedures as well as beneficiaries.	Completed	CBD Dept
Goal 2: Increase homeownership among low-income households and members of the protected classes	Continue the provision of funding to organizations who provide homebuyer and foreclosure counseling services.	Ongoing	CBD Dept Subrecipients
	Work with the regional lending community to explore the feasibility of developing a mortgage loan pool targeted to households who may not qualify for traditional mortgage products.	2yrs	CBD Dept Subrecipients

Goal	Actions	Timeframe and Metrics	Responsible Entity
Goal 3: Strengthen antidiscrimination investigation, enforcement, and operations	Continue to support the City of Rocky Mount Human Relations Commission's and Edgecombe County's fair housing related activities.	Ongoing	CBD Dept Human Relations
	Continue coordination and communication between the Human Relations Commission and the Community Development division.	Ongoing	CBD Dept Human Relations
	The Human Relations and Community Development Departments should coordinate with the Workforce Housing Advisory Commission to promote fair and affordable housing.	Ongoing	CBD Dept Human Relations WHAC
Goal 4: Increase the level of fair housing knowledge and understanding among landlords and the general public	Contract with a Qualified Fair Housing Enforcement Organization to conduct paired discrimination testing in the rental market and in the lending market.	Ongoing 1-2yr	CBD Dept Human Relations
	Continue partnering with Nash and Edgecombe counties to hold an annual Fair Housing Forum.	Ongoing Twice a year Once in April	CBD Dept Human Relations
	Continue to support other fair housing activities conducted by the City of Rocky Mount Human Relations Commission	Ongoing	CBD Dept Human Relations
	Develop a user-friendly, region specific fair housing guidebook, available in English and Spanish, to be distributed to neighborhood organizations and under-served populations throughout the region, including those with limited English proficiency.	Ongoing 1-2yrs	CBD Dept Human Relations
Goal 5: Implement affordable housing bond	Continue research toward implementation of an affordable housing bond	July 1, 2021	City Manager

Participation Appendix

NOTICE OF PUBLIC HEARINGS
CITY OF ROCKY MOUNT AND THE DOWN EAST HOME CONSORTIUM
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
HOME PROGRAM
THREE YEAR CONSOLIDATED PLAN FOR PERIOD FY 2021-2023
FY 2021 ANNUAL ACTION PLAN
ANALYSIS TO FAIR HOUSING CHOICE

Notice is hereby given that the City of Rocky Mount is currently preparing its Three-Year Consolidated Plan for FY 2021-2023, and Annual Action Plan for FY 2021. The City will apply for FY 2021 Community Development Block Grant (CDBG) and HOME Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). The City will conduct public hearings on the use of CDBG and HOME funds received from HUD for the three-year period FY 2021-2023 and for FY 2021. In accordance with the Final Rule for consolidation of the CDBG and HOME Programs 24 CFR Part 91, et al., the City will prepare a Consolidated Plan and Annual Plan, which will be submitted to HUD on or before May 17, 2021.

In addition to the 2021-2023 Consolidated Plan required by the U.S. Department of Housing and Urban Development (HUD), the City of Rocky Mount is also conducting a study concerning fair housing known as the "Analysis of Impediments to Fair Housing Choice" (AI).

The purpose of these hearings is to obtain the views and comments of citizens, public agencies and other interested persons relative to housing and community development needs that may be addressed by CDBG and HOME funds during the next three years. Meetings will also allow participants to provide input on fair housing issues for the City's AI.

The City will hold three virtual public hearings on January 26, 2021 at 6:30 p.m., January 27, 2021 at 9:00 a.m., and January 28, 2021 at 6:30 p.m. To participate, please join the meeting from a computer, tablet or smartphone.

GoToMeeting

<https://global.gotomeeting.com/join/439856893>

You can also dial in using your phone.

(For supported devices, tap a one-touch number below to join instantly.)

United States: +1 (571) 317-3112

- One-touch: tel:+15713173112,,439856893#

Access Code: 439-856-893

Anyone requiring special accommodations or who requires a presentation in a language other than English, please email Cornelia McGee-Anthony, Community Development Administrator at cornelia.mcgee-anthony@rockymountnc.gov by January 22, 2021.

The City expects to publish a draft of its proposed Three-Year Consolidated Plan for FY 2021-2023 and Annual Action Plan for FY 2021 on or about April 1, 2021. A copy of these documents will be placed on public display on the City of Rocky Mount, Nash County and Edgecombe County's websites for a thirty-day review period beginning on or about April 1, 2021. In addition, the City will make available a reasonable number of free copies (up to 10) on a first-come, first-serve basis or one free copy per large, organized group, to residents and groups that request them. The second public hearing advertised will present the proposed plan to the public. The City will consider comments on the proposed plan prior to adoption by City Council in early May 2021. The City intends to submit its Three-Year Consolidated Plan and Annual Action Plan to HUD on or before May 17, 2021.

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Regular Meeting of Local Organizations

Rocky Mount, NC

November 11, 2020 4pm

Rocky Mount Human Relations Commission

Housing Choice/Affordable Housing

- Stakeholders note there are sections in the community (East Side of the City (Edgecombe County side, South part of the City) that have fewer amenities for residents.
 - Lacking access to basic necessities that would make quality of life better. When these are not available, it creates a poor choice of housing.
- Stakeholders also note there is data that shows Rocky Mount is segregated and there are distinct areas where black households live
 - Access to amenities in those areas is limited and differences are visible
- Gentrification in parts of the community is a major concern (Falls Road), and these areas have differences in affordable housing rates.
- Stakeholders mentioned the need to diversify where affordable housing is located within the community and the need to limit concentration.
- There are several examples of affordable housing complexes that are considered model projects by stakeholders.
 - Cokey apartments Edgecombe side of Rocky Mount
 - Carriage Court
 - Rolling Meadows
- Stakeholders noted City Council has focused on affordable housing, particularly downtown, setting a goal to ensure there is affordable housing available.
 - Atlantic Arlington Corridor area has plans to develop commerce and housing.
 - Downtown renovations currently happening involving a component for affordable housing.
- There are several partnerships within the community to assist low- to moderate-income households.
 - Partnership with Opportunities Industrialization Center- Rocky Mount (OIC) and Edgecombe with CDC: education for first time homebuyers
 - OIC provides education and life skills training on a number of topics.
 - Legal Aide provides eviction expungement sessions weekly, housing counseling services and financial literacy.

Fair Housing/Discriminatory Practices

- Committee mentioned on occasion they receive questions about service animals and other fair housing questions. Stakeholders note often these are resolved when provided information and education about what the law says. Having communication can help resolve.
 - There have been several Fair Housing Workshops in collaboration with Community Development team.
 - Topics are based on trends. The committee provides an annual report to the Community Development team.
- There has not been any paired testing completed.
- Evictions have increased due to COVID.
 - Committee noted an alarming number of evictions that have been filed.
 - NC Governor recently released an Executive Order, stopping evictions for people who lost their jobs as a result of COVID.
 - There has been an increase in the number of property managers who are calling due to the loss of jobs of their tenants
- Stakeholders note Legal Aide is very involved in Fair Housing issues and a great resource in the community.

Regular Meeting of Local Organizations

Rocky Mount, NC

November 18, 2020 6pm

Rocky Mount Area Youth Council

Homelessness

- Stakeholders mentioned seeing an increase in homelessness and poverty. This has been exacerbated during the pandemic.
 - Seeing homeless persons on the streets (exit 64 off highway, shopping center, downtown Rocky Mount)
- The shelter in downtown is at capacity, resulting in many being left on the street.
- Programs that might help could include rental assistance, yet stakeholders note funding for public/supportive services is limited.
 - The group was concerned with insuring those with the greatest needs receive the assistance and insuring they prevent people from taking advantage of the system but still help people.
 - Stakeholders were unsure how do you really tell if someone is really in need.
- Youth homelessness does not seem to be an issue. There are very few youth and young adults on the street.

Digital Divide/Distance Learning

- This group of youth have not witnessed broadband being an issue.
- Schools will provide devices and wireless hotspots for those that need it to properly access education.

Parks and Public Facilities

- Stakeholders felt the community had adequate parks, however during the pandemic it is not clear how many are being used or are open.
 - Post-COVID, it would be nice to restore the trust of citizens and bridge the racial gap and maybe have some “bridge the gap” events.

Racial Divide

- This group noted the racial divide is worse than it has ever been.
 - Name calling and use of slurs is increasing.
 - Social media is a problem right now.

- Need to work toward fellowship. The group was unsure on how this could be addressed in the community.
- The group noted there are people in the community using social media to talk poorly of the community.

Miracle Question

- Low crime
- Transparency among all groups
- Great amount of unity
- Pride in city to attract others to the City.

Regular Meeting of Local Organizations

Rocky Mount, NC

November 20, 2020 2pm

Community Academy and City of Rocky Mount

Atlantic-Arlington Corridor

- Zoning Amendments
 - Proposed amendment to city code for accessory dwellings. In November, the planning board recommended approval. Next step is City Council approval.
 - Current zoning adopted in the 1970s. Current standards do not align with what is in area now.
- Proposed changes to the Atlantic-Arlington Corridor land use and zoning standards and could be used for the entire City.
 - City staff is reviewing land use code and zoning to develop new standards that would result in development that is desired.
 - Current zoning distribution 426 lots across 150 acres, zoned multi-family (1/3 land multi-family)
 - By-right currently a developer could acquire a group of lots and build multi-family building that are out of scale with the existing inventory.
 - Atlantic to Arlington is more commercial: zoned for business 26 vacant properties, looking at standards under plan on targeted redevelopment (NE Main and NE portion of area) most are developed.
 - Adjacent to these are single family lots, want to address by possible rezoning
 - 92 vacant residential properties in the study area. Infill development opportunity (want to put in standards as well)
 - 36 properties as deteriorated or dilapidated (using City scale)
 - 1/3 of the properties are vacant or unlivable; programs and assistance from Community Development will help bring new life into the area
 - January is a target date for presenting draft regulations addressing dimensional standards and creation of form-based district; would like input from residents, this is just the framework.
 - Community has a strong desire to maintain character in the area.
 - New development to take on the same form of the development.
 - Large detached single-family dwellings
 - 2 story dwellings (Atlantic Ave) North end and Southern end (single family detached)

- The group is still learning this process. There is a desire to preserve certain areas in the corridor and add more to the commercial district.
- Incentives to build affordable housing
 - Group discussed density bonuses (need to leverage the private market).
 - Other ideas to incentivize affordable housing
 - Density bonus would be part of these revisions, we would partner with Community Development on to determine what that ends up being and any other incentives.
 - Infill: can't guarantee new construction won't be priced higher as newcomers move to the area? Dimensional standards will be written to reflect what is there now.
 - Pricing control is beyond what zoning regulations could do
 - The State has protections for the elderly (tax abatement)
 - Designated Redevelopment Areas
 - Would like to use this to accomplish this. Neighborhood Conservation District Overlay districts; what we propose will do something similar.
 - Strengthen the connection between the City, residents and other parts of the community. Working with human relations and want to be more deliberate working with all neighborhood groups.
 - Want a meeting that addresses what policies that address pricing out people in the neighborhoods

Heritage Trail

- Identify cultural and historical sites
- Possible use of technology to make it educational.
 - Signs for trail are going up

Community Development Office Updates

- Rocky Mount Housing Authority; public announcement of project 8 new homes on Vance St. 2 1br 6 3-br in South Rocky Mount (DECH \$250,000 to CHDO, COR \$150,000) managed by RMHA
 - Not sure when construction will begin, but have full funding
- M&L will be developing the Con Plan and AAP.
 - November 30th -December 2nd will host stakeholder workshops that this group can participate, will receive invite via email.
- CDBG-CV \$328,242 (second allocation) \$309,806 (first allocation); proposed to use for utility assistance, economic development for small business, emergency rental assistance program.
 - Working with business center for the utility assistance from the 1st allocation

Regular Meeting of Local Organizations

Rocky Mount, NC

December 2, 2020 3pm

Down East HOME Consortium

Attendees:

Natasha Hampton – City Manager in Rocky Mount; Jennifer Holmes, City of Rocky Mount; Dr. Glenda Knight, Princeville; Jayson Dawkins – City of Rocky Mount; Cynthia Jones, City of Rocky Mount.

M&L staff gave an overview of the Consolidated Plan, 2021 Annual Action and Analysis of Impediments to Fair Housing Choice process to the group.

Overview of Stakeholder Sessions

M&L staff briefly described the common themes heard throughout the stakeholder input sessions.

- Members of the group stated they agreed with the common themes and they echo the desire to have thoughtful planning, especially with the Atlantic-Arlington Corridor plan. The community does not want to fight against development but want thoughtful, deliberate planning to protect those who are already there.
- Members noted a comprehensive approach to affordable housing in the community is needed because additional resources are needed. There is a need to be thoughtful and strategic and ask themselves:
 - What is doable given the financial resources?
 - What resources are available?
- Members agreed that COVID is going to introduce more challenges with respect to housing in addition to challenges that the community already faces.

Princeville Update

- Currently under the recovery process and most facilities are under construction currently. The Community is working on a land use plan and a flood plan as related to CDBG-DR with respect to hazard mitigation.
- Princeville continues to focus on working on dilapidated homes and community beautification.

Regular Meeting of Local Organizations

Rocky Mount, NC
Edgecombe County
January 5, 2021 10:00AM

Attendees: Eric Evans and Katina Braswell

Preservation, Rehabilitation and Creation of Affordable Housing

- There is a need for housing rehab, especially for elderly residents.
 - Much of the housing stock is ranch style brick homes and “Jim Walter” homes that helped people own a home but now they can’t maintain homes and need handicap modifications (grab bars, ramps, etc.)
 - Elderly residents want to live in their homes as long as possible.
 - Many elderly people need wrap around services to age in place, particularly if there are no family locally.
 - The County would like to hire case managers to help people navigate the existing social services.
 - Deferred maintenance is an issue.
 - The cost to maintain a home is often not something discussed.
- Affordable housing is a need to help build wealth and generational wealth.
- HOME funds are used for rehab, but there is an interest in using HOME for new construction as well.
- Edgecombe County is known for flooding due to the Tar River and had several hurricanes which cause substantial damage.
 - There are still people living in flood prone areas and need help with relocation and/or make homes more resilient.
 - Many in Princeville have been relocated.
 - FEMA elevation program is underway
 - There is a need to find ways to make homes more resilient to flooding.
- There is a need to meet the housing needs of LMI persons but also those with higher incomes. People want to live *and* work in the area.
 - Developers seem to “be shy” on developing in the area even though there is a huge need.
 - There is a significant lack of inventory available for sale.

Economic Development

- Kingsboro Business Park
- Some notable firms have located and expanded in Edgecombe including Corning and Triangle Tire and QVC
 - There are some infrastructure needs for some of these locations.

- Rebranded to the Kingsboro Business Park instead of Industrial Park.
 - Going to build a C-Store concept but bigger to attract people.
 - There are plans for a multiuse development with grocery store, pharmacy, housing, etc. making a self-contained and walkable community.

Regular Meeting of Local Organizations

January 28, 2021 3:00PM

Rocky Mount Redevelopment Commission

Rehabilitation and Creation of Affordable Housing

- The Commission has been trying to work on a deal around the YMCA and in South Rocky Mount, near the Oil Mill.
 - The area is a food desert and has several dilated houses and vacant lots.
 - There has been neighborhood pressure which has created barriers to development.
- There are several new members on the Commission, bringing new ideas and innovation.
 - Commission is exploring their budget and assets.
 - There is a desire to be strategic and target dollars.
 - Commission was successful doing this approach with the Beal Street project and is considering this approach for their next project.
 - The commission is considering a single family or commercial project next.
- Members noted the Edgecombe side of Rocky Mount has more blighted buildings and rehabilitation needs.
- Members discussed the balance needed between creating affordable housing for LMI households and the need for higher cost housing for economic viability.
 - There needs to be affordable housing and services to help raise families out of poverty.

Regular Meeting of Local Organizations

Rocky Mount, NC
February 1, 2021 10:00AM

Attendees: James Mercer

Homelessness

- Homeless service providers have a hard time finding units to move client into.
- Landlords have had bad experiences in the past renting to some households.
 - Region 9 will be working on hosting virtual landlord engagement sessions.
 - The region has Homeless Prevention and Rapid Rehousing funding to assist households stabilize.
- The Regional Committee recently convened a functioning Coordinated Entry Committee, which is tasked with streamlining the Coordinated Entry process.
 - Multidisciplinary team including social workers, mental health providers and homeless service providers.
 - The CoC currently utilizes a by-names list for all person experiencing homelessness as a tool for twice a month case staffing.
- The Region continues to work toward effective discharge planning from institutions. The NEW (Nash, Edgecombe, and Wilson County) Reentry Council is a coalition of community stakeholders that works to reduce/eliminate barriers to successful reentry.

Resources

- There is a continued need to fund homeless service providers.
 - Most funding opportunities often require match dollars.
- The Reach Center provides Homeless Prevention and Rapid Rehousing and is applying for additional funding.
- Mercer Foundation is possibly partnering with the Reach Center to provide Street Outreach service.

Stakeholder Sessions

Rocky Mount, NC
November 30, 2020 1:00PM

Impacts of Pandemic

- Some things could be a positive from the pandemic such as people working from home, which could mean more of a trend to suburbanization, which has already been happening in the area.
 - There has been a shift from working in the office to work from home and this will be a new way of doing jobs or even finding workers from out of the area.
- COVID has changed the landscape and the data does not reflect the long term impacts it will have on the community.
- COVID highlighted the digital divide in the rural areas and even for some populations within the cities.
- There has been a rise in murders in Rocky Mount, Charlotte and Durham. This is not a “hire more police” solution.
 - There needs to be a continuum from policing to service providers.
- Food insecurity has increased since the pandemic. Food banks are overwhelmed by people affected by unemployment due to COVID in addition to those who used food banks before the pandemic hit.
 - Persons of color and children are being hit hard by food insecurity
 - This is going to be a longer-term issue.
- Stakeholders note evictions are about to spike.
 - The current shelter structure can't handle an increase in homelessness and many feel there is a need for a rental assistance program to help people who are being evicted.
 - There is also a need for utility assistance. The City's recent moratorium has been lifted and left the community with a large amount of debt.

Affordable Housing

Impacts of Raleigh Growth

- Raleigh has a large affordable housing problem and that impact Nash/Edgecombe Co.
 - Stakeholders note a need for a policy to address this issue.
- Stakeholders state that Rocky Mount's more affordable housing stock may encourage Raleigh residents to relocate to the area.

Need for Affordable Housing

- Housing rehabilitation continues to be a top priority for the community.
- Downtown development is a good economic strategy but there is a need to prepare for the impact on neighborhoods near downtown.
 - Stakeholders believe there needs to be a strategic approach to maintaining the naturally occurring affordable housing.
 - There needs to be additional funds for the rehabilitation and new construction of housing in the area.
 - There is a need to research incentives for developers such as density bonuses to build affordable housing.
- Stakeholders note there is a need for housing at all income tiers.
 - Special attention needs to be considered for seniors and low- to moderate-income households.
- There is a need for units for households in the lowest income tiers.
 - Those receiving SSI or SSDI cannot afford any housing. Housing that is affordable to this group is often unsuitable for habitation.
- Homelessness is an issue in the community. Many people cycle through the shelter system due to a lack of affordable housing.
 - Some have been banned from the shelters and now have no other options.
 - Stakeholders note that it sometimes takes a referral from police to receive emergency shelter.
 - Shelter is now limited to 90 days but many are asked to leave at 30-60 days.
- Rocky Mount is in the early stages of these housing and economic challenges.
 - Stakeholders note a need to plan for the future and the protections and have inclusive development

Broadband

- Stakeholders note there is a digital divide within the region.

Youth

- Stakeholders note there are many students that are not getting services that they need.
 - Stakeholders note the need for mental health services not only because of isolation but also some home environments are not as safe and secure as school.
 - Parents that may or not be working from home, so they don't necessarily have the structure to do home school.

- General Assembly did allocate some funding for hot spots, but it does not meet the need. When there are bus hot spots, they may be in locations that are not accessible.

What the City should do:

Affordable Housing

- Create a strategic approach to the affordable housing needs in the community that includes input from current residents.
- Research best practices across the state and country for possible incentives for affordable housing development.
- Continue housing rehabilitation programs and seek additional funds for this work.
- Address the services needed for youth as a result of the pandemic.

Stakeholder Sessions

Rocky Mount, NC

December 1, 2020 3:00PM



Infrastructure and Facilities

- Stakeholders noted the City of Rocky Mount is embarking on battle park area and received a grant to do reconstruction
 - Parks have received upgrades across the City of Rocky Mount: basketball courts, playground equipment
- Rocky Mount has a 10-mile nature trail that is used often in the community.
 - There are plans for additional trails in the future.
- The community recently completed a street project with Citizen Participation.
 - Project includes widening the through fare and a roundabout.

Public Services

- Stakeholders note the need for counseling services for youth, especially since the pandemic. Many aren't socializing and need an outlet.

Preservation and Creation of Affordable Housing

- Stakeholders note in the previous Analysis of Impediments to Fair Housing Choice, HUD maps that showed there were a number of subsidized housing units, of which Edgecombe County had the most.
 - Pre-pandemic: there were concerns about gentrification in parts of the community and concerns about ethical redevelopment.
 - Stakeholders note if there are new opportunities to develop sections of the community, there is a desire to be sure affordable housing is being discussed in all parts.
- Stakeholders note a need for programs to allow seniors to age in place and received assistance to rehab their homes.
 - Rocky Mount has three programs to address rehabilitation: One program that is funded through general funds and is not income based, provides a rehab matching rebate (Up to 50% not to exceed \$12,500): owner pays upfront of repairs and gets reimbursed.
 - Rocky Mount staff state they are seeing more residents in the Nash County side take advantage of the program.
 - Property owners are not always the resident (investment properties).
 - The program is so popular that it had to stop October 30th because of a lack of funding.
 - No period of affordability, owner does need to submit information and they must own the property. Do not track what happens after being in the program.

- The housing rehabilitation programs are facing a challenge. Currently there is a cap on the maximum amount of repairs (\$12,500) per unit.
 - This is not enough to cover the full amount required for repairs that are needed on the home.
 - Cost of materials increasing (due to COVID). Urgent repair needs (HVAC, roof) prices are bidding well over the max amount.
 - If the City decides to increase the max amount on repairs, fewer people will be able to participate.
- This year 18 applications were assisted with the Urgent Repairs, despite a larger number of applications.
 - Contractors state they have seen an increase in work and are currently at capacity. We are at a need for contractors that can take on these.
 - The City is hiring a new staff member who will be working on recruiting contractors.
- Stakeholders note the need to be strategic and mitigate the risks and negative effects of gentrification.
 - Stakeholders would like to see incentives for private developers be offered to help in the creation of affordable housing.

Vocational Training

- Nash and Edgecombe Community Colleges offer trade classes in trades such as HVAC, electrical.
- There are construction classes and hands-on training at OIC of Rocky Mount.

What the City should do:

Affordable Housing

- Create a strategic approach to the affordable housing needs in the community that includes input from current residents.
- Research best practices across the state and country for possible incentives for affordable housing development.
- Continue housing rehabilitation programs and seek additional funds for this work.

Stakeholder Sessions

Rocky Mount, NC

December 2, 2020 11:00AM



Public Services

- Stakeholders note the City of Rocky Mount could do more to educate and market the bus system.
 - This is an asset to the community, yet many people seem to be unaware of the routes.
- Stakeholders note the need to improve education for youth in the community.
 - Stakeholders note the education system is lacking. There is a need to provide more resources.
 - 50% of kids are failing in the Nash County School system (since pandemic started).
 - Some areas do not have adequate Wi-Fi and the conditions for learning are not ideal.
 - The schools need to work with other partners and build more support systems for the youth.
 - There is a need for **Academic support:**
 - There is a need for additional remote learning sites in the City;
 - additional resources to pay staff to provide these services; and
 - reliable Wi-Fi.
 - Stakeholders note the need to take a more targeted approach to identifying the student who have the highest needs and provide wrap around services (similar to Rocky Mount program HEROS program),
 - There is a need for **Mental Health services.** Many youth are struggling and need resources.
 - There is a need to retain and recruit the “best and brightest” youth in Rocky Mount to return to the community.
 - Many youth say the only way to “make it” is to leave Rocky Mount.
 - Stakeholders believe it could help if employers would work toward recruiting local talent. The area has several engineering jobs.
 - There is a need to build affordable housing and rebrand the community:
 - Stakeholders note the newspaper and social media often paints the community in a bad light. This is diverting people from moving to the area.

- There is a need to promote more of the positive things and talk about what is exciting in Rocky Mount.

Preservation and Creation of Affordable Housing

- Stakeholders note the need for consistent Code Enforcement.
 - This could help reduce crime in neighborhoods and encourage residents to maintain their properties.
- There is a lack of affordable housing.
 - Stakeholders note hearing some landlords require three months' rent in advance.
 - This could deter people from moving to the area. This practice does not seem to be required in the higher income areas of the City.
- Housing Rehab is one of the greatest needs, yet there is a lack of funding for this work.
 - The City operates three programs, but none have enough money to meet the needs.
 - The City purchased a few properties in the past and rehabbed a full neighborhood. (Bill Street)
 - Bill Street included the demolition of a complete neighborhood, HOME dollars were utilized to build new rental units on the properties.
- Currently in South Rocky Mount, the Redevelopment Commission is looking to rehab and developed a full neighborhood again.
 - Commission members drove around the City to select what neighborhood might need help.
 - Stakeholders are interested in a more strategic way of to identify areas to reinvest.

Fair Housing

- There is a need to address fair housing issues across the community.
 - Stakeholders note there are clear differences in neighborhoods in the community. Some are well kept and have low crime, while other have blighted properties and high crime.
 - There is a need to educate people and provide better housing options in these areas
 - Stakeholders view fair housing as a way to give people access to choose where they live.
- The Human Relations Commission holds workshops for tenants to know their rights.
 - Prior Director noted the commission found that the Hispanic community was the population that was most impacted by Fair Housing.

What the City should do:

- Take a strategic approach to addressing youth educational and mental health needs.
- Continue to address Fair Housing issues and focus on access to opportunities and amenities in lower income neighborhoods.
- Consider a strategic approach to prioritizing the housing rehabilitation needs across the community.

Rocky Mount Stakeholder 1 Attendees

Summary

Meeting Date

November 30, 2020 12:42 PM EST

Meeting Duration

85 minutes

Details

Name

Christine DeRunk

India

Jessica Lurz

Kevin Tang

Mabeleen Taylor-Jones

Marjorie Willow

elaine Courcelles

susan Perry Cole

Email Address

christined@mandl.net

billw@mandl.net

billw@mandl.net

elainecourcelles@yahoo.com

sperrycole@ncacdc.org

Number of Attendees Meeting ID

7 954-944-701

Join Time	Leave Time	Time in Session (minutes)	Organization
12:58 PM	2:07 PM	69	M&L
1:06 PM	1:20 PM	14	Community Acade
12:42 PM	2:07 PM	85	M&L
12:56 PM	2:07 PM	70	M&L
12:58 PM	2:07 PM	68	ty of Rocky Mount
1:02 PM	2:07 PM	65	M&L
12:55 PM	2:07 PM	72	Rocky Mount Re-
1:12 PM	2:07 PM	54	NC Association o

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my and City of Rocky Mount

-Development Commission
f Community Development Corps

Rocky Mount Stakeholder 2 Attendees

Summary

Meeting Date

December 1, 2020 9:56 AM EST

Meeting Duration

20 minutes

Details

Name

Christine DeRunk

Jessica Lurz

Kevin Tang

Mabeleen Taylor-Jones

Email Address

christined@mandl.net

billw@mandl.net

Number of Attendees Meeting ID

4 668-653-805

Join Time	Leave Time	Time in Session (minutes)	Organization
9:58 AM	10:16 AM	18	M&L
9:56 AM	10:16 AM	20	M&L
9:56 AM	10:16 AM	20	M&L
10:00 AM	10:16 AM	15	City of Rocky Mount

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Rocky Mount Stakeholder 3 Attendees

Summary

Meeting Date

December 1, 2020 2:55 PM EST

Meeting Duration

67 minutes

Details

Name

Alecia Amoo
CYNTHIA JONES, CITY OF ROCKY MOUNT
Christine DeRunk
India Silver
Jessica Lurz
Jocelyn Bolton-Wilson
Kendra Silver - City of Rocky Mount
Kevin Tang
Mableen Taylor-Jones
Yolanda Taylor

Email Address

Aleciaa@legalaidnc.org
cynthia.jones@rockymountnc.gov
christined@mandl.net
indiarsilver@gmail.com
billw@mandl.net
jocelynb@legalaidnc.org
kendra.silver@rockymountnc.gov

Number of Attendees Meeting ID

10 920-900-973

Join Time	Leave Time	Time in Session (minutes)	Organization
3:00 PM	4:00 PM	59	Legal Aide of NC
3:04 PM	4:02 PM	57	City of Rocky Mount
2:56 PM	4:02 PM	66	M&L
3:01 PM	4:02 PM	60	Community Academy and City of
2:55 PM	4:02 PM	67	M&L
2:58 PM	4:02 PM	64	Legal Aide of NC
2:59 PM	4:02 PM	63	City of Rocky Mount
2:58 PM	4:02 PM	63	M&L
3:03 PM	4:02 PM	59	City of Rocky Mount
3:10 PM	4:02 PM	52	Legal Aide of NC

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Rocky Mount

Rocky Mount Stakeholder 4 Attendees

Summary

Meeting Date

December 2, 2020 10:53 AM EST

Meeting Duration

92 minutes

Details

Name

Christine DeRunk

Jessica Lurz

Kendra Silver - City of Rocky Mount

Kevin Tang

Loretta Braswell

Mabeleen Taylor-Jones

RonGreen

Email Address

christined@mandl.net

billw@mandl.net

kendra.silver@rockymountnc.gov

loretta.braswell@rockymountnc.gov

rgreen@bgcnec.org

Number of Attendees Meeting ID

7 339-319-701

Join Time	Leave Time	Time in Session (minutes)	Organization
10:57 AM	12:26 PM	89	M&L
10:53 AM	12:26 PM	92	M&L
11:00 AM	12:26 PM	86	City of Rocky Mount
10:57 AM	12:26 PM	89	M&L
11:01 AM	12:26 PM	84	City of Rocky Mount
10:56 AM	12:26 PM	89	City of Rocky Mount
11:13 AM	12:26 PM	73	Boys and Girls Club

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**Public Needs Meeting for the
Rocky Mount and Down East HOME Consortium Consolidated Plan and Annual Action Plan
Analysis of Impediments to Fair Housing Choice
January 26, 2021 6:30PM**

The following provides an overview of the public needs meeting and summarizes the housing and community development needs and/or comments made by attendees during the meeting.

- The meeting began at 6:30PM with a presentation by M&L of the overall purpose of the public meeting, a general review of the 3-year Consolidated Plan, eligible activities under CDBG and HOME, the National Standards, Fiscal Year 2021 anticipated funding, Fiscal Year 2019 activities funded through CDBG and the proposed schedule for preparation, adoption and submission of the 2021 Plans to HUD.
- Following the presentation, the meeting was opened for public comments on housing and community development needs by those in attendance. The following items/needs/issues were stated by the meeting attendees:
 - One participant noted the President of the United States recently issued orders on equity, noting there are clear patterns of inequality throughout the City and stating the City needs to act.
 - Participants noted the City is racially segregated and needs to restore justice in the community, noting there are policies and practices that systemically discriminate against people of color.
 - Participants noted equity and fair access without discrimination in all areas are high priorities for community members.
 - One participant noted the need to move to a more equitable model to improve participation for minorities and more needs to be done to improve access.
 - Participants noted in the City's 2003 Comprehensive Plan, the City was investigating implementing an affordable housing bond. While the City did in fact follow the plan and conduct a cost-benefit analysis, the bond has not been implemented.
 - Participants note the need for an affordable housing bond or general obligation bond that can assist with homeownership, home repairs, and rehabilitation.
 - One participant noted affordable housing is a major need for Rocky Mount and many people are living in substandard housing.
 - Participants stated there is a need for incentives for developers, as outlined in the Atlantic-Arlington Corridor. Participants want to see the entirety of the Atlantic-Arlington Corridor to be implemented.
 - Participants noted the need for the Workforce Housing Advisory Commission to be continued in 2021.
 - Participants noted the need for a strategic approach to affordable housing in the community.

- It was noted there needs to be improved coordination between stakeholders and within departments.
- Participants noted the need for a unified vision for implementing economic development and housing activities across the City.
- Participants also noted there has been an increase in economic interest in the region, especially for job creation.
 - The Atlantic-Arlington Corridor is expected to be one of the hot zones for economic growth.
- One participant suggested neighborhood leaders be informed of the upcoming public meetings for the CP/AAP/AI process.
 - City staff noted the various outreach efforts made so far and stated they would reach out to leaders.

**Public Needs Meeting for the
Rocky Mount and Down East HOME Consortium Consolidated Plan and Annual Action Plan
Analysis of Impediments to Fair Housing Choice
January 27, 2021 9:00AM**

The following provides an overview of the public needs meeting and summarizes the housing and community development needs and/or comments made by attendees during the meeting.

- The meeting began at 9:00AM with a presentation by M&L of the overall purpose of the public meeting, a general review of the 3-year Consolidated Plan, eligible activities under CDBG and HOME, the National Standards, Fiscal Year 2021 anticipated funding, Fiscal Year 2019 activities funded through CDBG and the proposed schedule for preparation, adoption and submission of the 2021 Plans to HUD.
- Following the presentation, the meeting was opened for public comments on housing and community development needs by those in attendance. The following items/needs/issues were stated by the meeting attendees:
 - One participant noted people in the community feel they are being left behind.
 - Participants feel the City has been discriminatory.
 - Participants noted they have seen a decline in the community since 1997, noting roads in Nash are nicer and the Edgecombe-side is overlooked.
 - One participant noted the extensive community involvement in the development of the Atlantic Arlington Corridor plan and asked about a status update on this.
 - City staff stated she would participants contact information and have the correct City Department reach out.
 - One participant noted the President of the United States recently stated there is a need for housing nationwide.
 - Participants note the Atlantic Arlington Corridor plan needs to be noted in the Con Plan and should be fully implemented.
 - Participants stated they are looking for housing justice and the City needs to take intentional steps. Participants note they understand the federal funding isn't enough but they are looking at a frame of reference so they can more fully participate.
 - One participant noted the Accessory Dwelling Units (ADU) zoning that was part Atlantic Arlington Corridor plan that should be implemented.
 - One participant stated residents are "battling for the soul" of the City and residents want to see evidence that the City is going to take steps to make changes to the disparities in neighborhoods. The participant stated residents are standing for housing justice because they live in these neighborhoods and harm has been done and they want to see how the City can undo the harm.
 - Participants stated they wanted to see the City take the next steps to implement and plan for an affordable housing bond.
 - One participant noted her neighborhood has deteriorated over the years and there are more vacant houses than people in them.
 - Many participants state they see the money going to Nash County.

- Participants noted they want more transparency and want the City to work with the community on affordable housing. Participants state they aren't getting the information about what is happening and they want to be a part of changing things and moving forward and want to work with the City.
- Participants noted the Atlantic Arlington Corridor plan and the desire to encourage multifamily units by providing incentives to private developers. Using these incentives as a way to attract investment in lower opportunity areas and possibly bring development to higher opportunity areas.
- One participant noted during public meetings for the CARES Act funds, community members made recommendations about rental assistance.
 - Treasury money will be funneled through the state and will become a state level program. There is some eligibility at the local level, some of the CDBG money has gone to housing counselors. There may be a need to support funding for housing counselors in the future.
- Participants also noted food distribution and community-based food production has been something the community has been exploring, noting the need for healthy foods in the community and possible community gardens in distressed neighborhoods.
- Participants noted the need for the Workforce Housing Advisory Commission to be continued in 2021, wanting to see the group brought online and educated and be involved in creations of the plans.
- One participant noted there is a need for more parks and recreational areas for youth. There is a need for park improvements due to flooding of the tennis courts and swimming pool.

Rocky Mount and Down East HOME Consortium Consolidated Plan and Annual Action Plan
Analysis of Impediments to Fair Housing Choice
January 28, 2021 6:30PM

The following provides an overview of the public needs meeting and summarizes the housing and community development needs and/or comments made by attendees during the meeting.

- The meeting began at 6:30PM with a presentation by M&L of the overall purpose of the public meeting, a general review of the 3-year Consolidated Plan, eligible activities under CDBG and HOME, the National Standards, Fiscal Year 2021 anticipated funding, Fiscal Year 2019 activities funded through CDBG and the proposed schedule for preparation, adoption and submission of the 2021 Plans to HUD.
- Following the presentation, the meeting was opened for public comments on housing and community development needs by those in attendance. The following items/needs/issues were stated by the meeting attendees:
 - One participant noted there are unfair banking practices and a need to move to a more equitable model of housing justice.
 - One participant noted the need for safe and affordable housing and an equitable share of money that flows into the community.
 - Participants note the need for better access to food, jobs, healthcare, housing etc. for Black households.
 - Participants noted the Workforce Housing Advisory Commission was created out of 2018 AI and they would like to start these meetings up again even using a virtual platform.
 - One participant noted that Covid-19 has widened inequity and states the City needs to adjust to the changing needs.
 - One participant noted that those who are from smaller communities see the need for more affordable housing options using rental subsidies and continued need for home rehabilitation.
 - There is also a need for job training and economic development, noting there are only fast food or Dollar General-type places for employment.
 - There is a need for youth programs and smaller towns such as Sharpsburg need Community Centers.
 - One participant noted there is a need to reduce the number of food deserts, noting in LMI neighborhoods there are only corner stores that do not always provide staple food items. There is a desire for open air produce stands and/or farmers' markets.
 - One participant noted the need for employment opportunities for youth and young adults. The participant noted CDBG could be used to leverage economic opportunities, especially for construction and could be used to improve historic neighborhoods.
 - One participant noted City has relied on Low Income Housing Tax Credits (LIHTC) for affordable housing development, but there are very specific requirements such

as having a grocery store within a certain distance. Not having a grocery store in certain areas has created an impediment to affordable housing development. The participant noted there is one grocery store on the east side of town and suggested using CDBG to help get a grocery store.

- Another participant noted the need for job training programs and interviewing skills and job opportunities for those who have been out of work for very long periods--maybe due to caring for kids or elders at home.
- One participant asked if there are any 2018-2020 funds available. The City noted there are funds and they are earmarked for DPA up to \$25,000 for first-time homebuyers and rehab.
- One participant asked if CDBG could be used for boarded up homes. City staff noted they could be used for rehab or demolition and suggested the participant send a list of addresses of the homes the participant was referencing.
- One participant asked what happens to comments received during this process. City staff noted these are added to the documents and informed participants of the additional public meetings and public display period.
- One participant asked if there is a way to get a Covid-19 vaccination for people that don't have transportation. City staff noted that the local health departments are looking to set up a few sites. City staff suggested contacting the local health department.
- One participant commented that Rocky Mount should have a mobile bus come to neighborhoods in need to administer vaccines, one participant stated vaccines should go to churches and noted that the current distribution practices assume that all people have internet access and ability to use the internet.
- One participant noted the educational gap is becoming more obvious due to the digital divide.
- One participant asked if these public meetings were only advertised online. City staff stated all the ways in which the meetings were advertised.
- Participants noted not everyone has access to computers or the ability to use zoom or similar and the internet can be slow.
- One participant noted the need to have discounts applied for those who cannot afford \$85/month for internet and phones especially due to increase in homeschooling.

City of Rocky Mount and Down East HOME Consortium public needs Summary

Meeting Date	Meeting Duration	Number of Attendees	Meeting ID
January 26, 2021 6:23 PM EST	45 minutes		16 439-856-893

Details

Name	Email Address	Join Time	Leave Time
+12522663543		6:25 PM	7:09 PM
+12524690516		6:32 PM	7:08 PM
+12525443865		6:25 PM	7:08 PM
+19192197069		7:03 PM	7:08 PM
+19192197069		6:47 PM	6:49 PM
Christine DeRunk	christined@mandl.net	6:28 PM	7:08 PM
Cornelia McGee		6:29 PM	7:08 PM
Cynthia J		6:23 PM	7:08 PM
Cynyhia Bynum-Willet		6:28 PM	7:09 PM
Jackie King	jackiek130@gmail.com	6:23 PM	7:08 PM
Jessica Lurz	billw@mandl.net	6:23 PM	7:09 PM
Kevin Tang		6:28 PM	7:08 PM
LaVerne Joyner	ljoyner@ncacdc.org	6:33 PM	7:04 PM
Marjorie Willow	billw@mandl.net	6:26 PM	7:09 PM
Rosa Brodie		6:29 PM	7:08 PM
Sharon A Evans	saevans59@hotmail.com	6:35 PM	7:09 PM
susan Perry Cole	sperrycole@ncacdc.org	6:26 PM	7:08 PM

ds meetings Attendees

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Time in Session (minutes)

43

36

43

5

2

40

39

45

40

45

45

40

30

42

39

33

42

City of Rocky Mount and Down East HOME Consortium Summary

Meeting Date **Meeting Duration**
January 27, 2021 8:52 AM EST 86 minutes

Details

Name	Email Address
+12522663543	
+12523146554	
+12523146554	
+12524690516	
+12525442353	
+12529777179	
Brenda Cooper	cooperbf1@gmail.com
Catherine Grimm	
Christine DeRunk	billw@mandl.net
Cynthia Jones	Cornelia.McGee-Anthony@rockymountnc.gov
Jayson	
Jessica Lurz	billw@mandl.net
Julius Moody	
Kevin Tang	
Mabel Taylor-Jones	mabel.taylor-jones@rockymountnc.gov
Nelida Torres	adilen_serrot@yahoo.com
Rosa Brodie	
Sharon A Evans	saevans59@hotmail.com
Sharon A Evans	saevans59@hotmail.com
Sharon A Evans	saevans59@hotmail.com
Troy Lewis	troylewis@me.com
susan Perry Cole	sperrycole@ncacdc.org

in public needs meetings Attendees

GoToMeeting

Number of Attendees **Meeting ID**

19 439-856-893

Join Time	Leave Time	Time in Session (minutes)
9:00 AM	10:19 AM	78
9:54 AM	9:58 AM	4
10:03 AM	10:19 AM	15
8:59 AM	10:19 AM	79
9:13 AM	10:19 AM	65
9:00 AM	10:16 AM	75
10:18 AM	10:19 AM	1
8:53 AM	10:03 AM	69
8:52 AM	10:19 AM	86
9:00 AM	10:19 AM	79
9:29 AM	10:19 AM	50
8:54 AM	10:19 AM	84
9:59 AM	10:19 AM	19
8:57 AM	10:19 AM	81
9:01 AM	10:19 AM	78
9:35 AM	10:19 AM	44
8:59 AM	10:19 AM	79
8:53 AM	9:49 AM	55
10:06 AM	10:19 AM	13
9:58 AM	10:02 AM	3
9:20 AM	9:55 AM	34
8:55 AM	10:19 AM	84

City of Rocky Mount and Down East HOME Consortium public nec Summary

Meeting Date	Meeting Duration	Number of Attendees
January 28, 2021 6:15 PM EST	64 minutes	23

Details

Name	Email Address	Join Time
+12523144409		6:29 PM
+12523146554		6:41 PM
+12524528080		6:27 PM
+12525443865		6:44 PM
+12525443865		6:28 PM
+12528223986		6:15 PM
Alecia Amoo	Aleciaa@legalaidnc.org	6:32 PM
Amanda Sparling	asparling@amerihealthcaritas.com	6:27 PM
Christine DeRunk	billw@mandl.net	6:25 PM
Cornelia Mcgee		6:31 PM
Cynthia J		7:14 PM
India		6:47 PM
India		6:22 PM
James Mills	james.mills@edwardspencergroup.com	6:39 PM
Jocelyn Bolton-Wilson	jocelyn@legalaidnc.org	6:21 PM
Kelvin Macklin	kmacklin@rm-ha.org	6:24 PM
Kevin Tang	billw@mandl.net	6:15 PM
Keyana Walston		6:15 PM
Kim Eng Koo	kekoo@centurylink.net	6:29 PM
Lea Henry	lea@tworiversdevelopmentpartners.com	6:26 PM
Marjorie Willow	billw@mandl.net	6:38 PM
Patricia Gittens	Aadancer@erols.com	6:18 PM
Sharon A Evans	saevans59@hotmail.com	6:27 PM
Sharon A Evans	saevans59@hotmail.com	6:42 PM
Stevie Cox, Sharpsburg Town Adm	townadministrator@sharpsburgnc.com	6:15 PM
Tamisha Patterson	bornstaracademy15@gmail.com	6:28 PM

Eds meetings Attendees

GoToMeeting

Meeting ID

439-856-893

Leave Time Time in Session (minutes)

7:15 PM	46
6:42 PM	1
7:19 PM	51
7:19 PM	35
6:43 PM	14
7:19 PM	63
7:18 PM	46
7:19 PM	51
7:19 PM	54
7:19 PM	48
7:19 PM	4
7:19 PM	31
6:48 PM	25
6:56 PM	16
7:19 PM	57
7:19 PM	54
7:19 PM	64
7:19 PM	63
7:19 PM	50
6:56 PM	29
7:19 PM	40
7:19 PM	60
6:28 PM	0
7:19 PM	36
7:19 PM	63
7:19 PM	50



CITY OF ROCKY MOUNT & DOWN EAST HOME CONSORTIUM

Public Meetings for:
2021-2023 Consolidated Plan
2021 Annual Action Plan
Analysis of Impediments to Fair Housing Choice

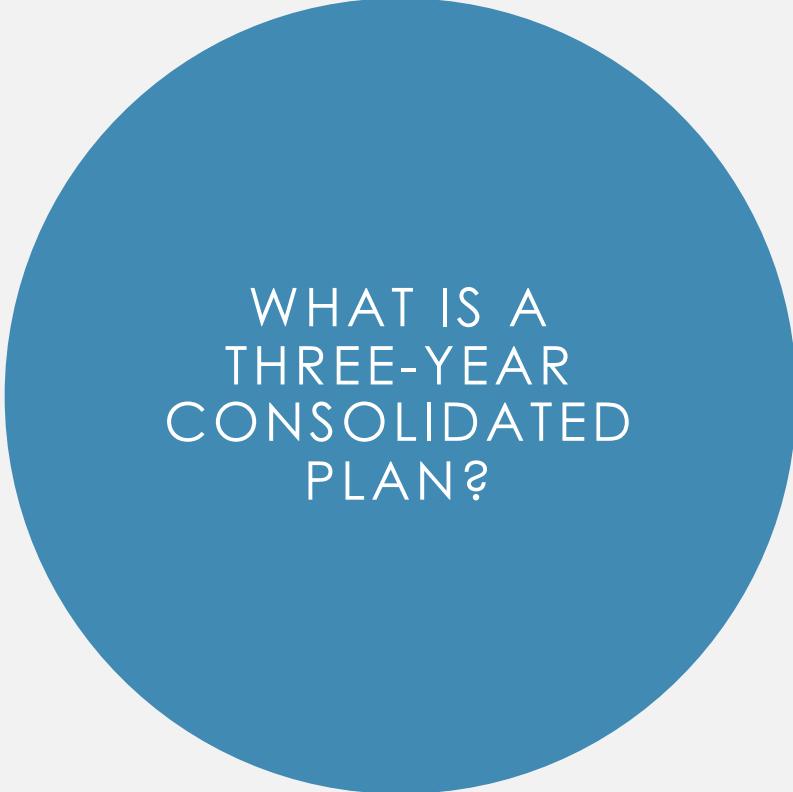
January 26-28, 2021

MULLIN &
LONERGAN
ASSOCIATES
INCORPORATED



ROCKY MOUNT, NC
THE CENTER OF IT ALL

CONSOLIDATED PLAN
AND
ANNUAL ACTION PLAN



WHAT IS A THREE-YEAR CONSOLIDATED PLAN?

Required for all HUD Funding

Covers the Period: July 1, 2021 thru June 30, 2023

Components:

- Stakeholder Consultation (Public Agencies, Nonprofit Service Organizations, Residents, Homeless Assistance Organizations, Public Housing Authority, etc.)
- Housing and Homeless Needs Assessment
- Housing Market Analysis
- Strategic Plan - Local Priorities
- Annual Action Plan - Proposed Activities for Program Year 2021: (July 1, 2021 - June 30, 2022)

BASIC CDBG ELIGIBLE ACTIVITIES



Housing
Rehabilitation



Homeownership
Assistance



Public Facilities
and
Improvements



Blight Removal
Demolition/Site
Preparation



Code
Enforcement



Economic
Development



Acquisition /
Disposition of
Real Property



Public Services

CDBG PUBLIC SERVICES

- Limited to 15% of CDBG Grant Amount
- Employment Training, Crime Prevention, Childcare, Health Care, Drug Abuse Education, Fair Housing Counseling, Energy Conservation, Homebuyer Education, or Recreation Programs

MEETING NATIONAL OBJECTIVES

Each activity must meet one of the
THREE NATIONAL OBJECTIVES:



Benefit Low- and
Moderate-Income
Persons
(at least 70% of
grant amount)



Prevent or Eliminate
Blight
(not more than
30% of grant
amount)



Urgent Needs
when health and
welfare are
threatened

Household Size	Maximum Income (80% HAMFI for Rocky Mount MSA)
1 person	\$32,550
2 person	\$37,200
3 person	\$41,850
4 person	\$46,500
5 person	\$50,250
6 person	\$53,950
7 person	\$57,700
8 person	\$61,400

DEFINITION OF
LOW- AND MODERATE-
INCOME
IN
ROCKY MOUNT, NC MSA
IN 2020

HOME



Housing
Rehabilitation



Homeownership
Assistance



New Construction of
Affordable Housing



Tenant Based Rental
Assistance

- We do not have 2021 allocations yet.
- Funding estimates based on FY20 grants:
 - CDBG \$526,560
 - HOME \$579,112



FY 2021
FUNDING
ANTICIPATED

ACTIVITIES FUNDED IN PROGRAM YEAR
2019: (JULY 1, 2019 – JUNE 30, 2020)
CITY OF ROCKY MOUNT
DOWN EAST HOME CONSORTIUM

CITY OF ROCKY MOUNT INVESTED FUNDS TO ASSIST:

- 19 homeowners with urgent and safety repairs to their homes,
- 23 homeowners make housing repairs to their homes,
- 32 homeowners make housing improvements,
- Down East HOME Consortium provided 2 deferred loans to homeowners for housing rehabilitation,
- Public services at the Boys and Girls Club of the Tar River Region, Buck Leonard Association for Sports & Human Enrichment Mitchell House Construction Trades Project, Rocky Mount Edgecombe Community Development Corporation Housing Counseling Center and United Community Ministries House the Children at the Bassett Center.
- 100 persons were provided with one-on-one business counseling and technical assistance by the Rocky Mount Edgecombe Community Development Corporation Business Counseling Center

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

WHAT IS FAIR HOUSING?



EQUAL HOUSING
OPPORTUNITY

- The right to choose housing free from unlawful discrimination
- Federal, state, and local laws protect people from discrimination in housing transactions such as rentals, sales, mortgage lending and insurance
- It ensures access to housing for everyone

FAIR HOUSING PROTECTED CLASSES



Race



Color



Religion



Disability



Sex



Familial
Status



National
Origin

EXAMPLES OF HOUSING DISCRIMINATION

A landlord or agent asks questions about your religious practices

A unit is advertised as “vacant” or “for sale” but the agent refuses to show it to you

Extra security deposit is required for families with children

A landlord refuses to rent to you because you use a wheelchair

PUBLIC COMMENT



PUBLIC
COMMENT
...YOUR
OPINION
COUNTS!

What are Rocky Mount and DEHC's most urgent needs?

- Housing?
- Infrastructure?
- Facilities (Community Centers, Neighborhood Centers, Libraries, etc.)?
- Services (Job Training, Youth Programs, Childcare, etc.)?
- Employment Opportunities?



HAVE YOU
EXPERIENCED
DISCRIMINATION?

- In your search for housing?
- In your efforts to stay in your housing?
- What did you do?

NEXT STEPS

- **Complete our survey:** <https://www.surveymonkey.com/r/XNTSJL6>
- **January-February:** Draft the Consolidated Plan, Annual Action Plan and AI
- **April:** Begin 30-Day Public Display/Comment Period
- **April:** Public Hearing at Rocky Mount City Council
- **May:** Edgecombe County Board of Commissioners Presentation
- **May:** Rocky Mount City Council Presentation
- **May 15:** Submission of Plans to HUD
- **July 1, 2021:** Program Year Begins

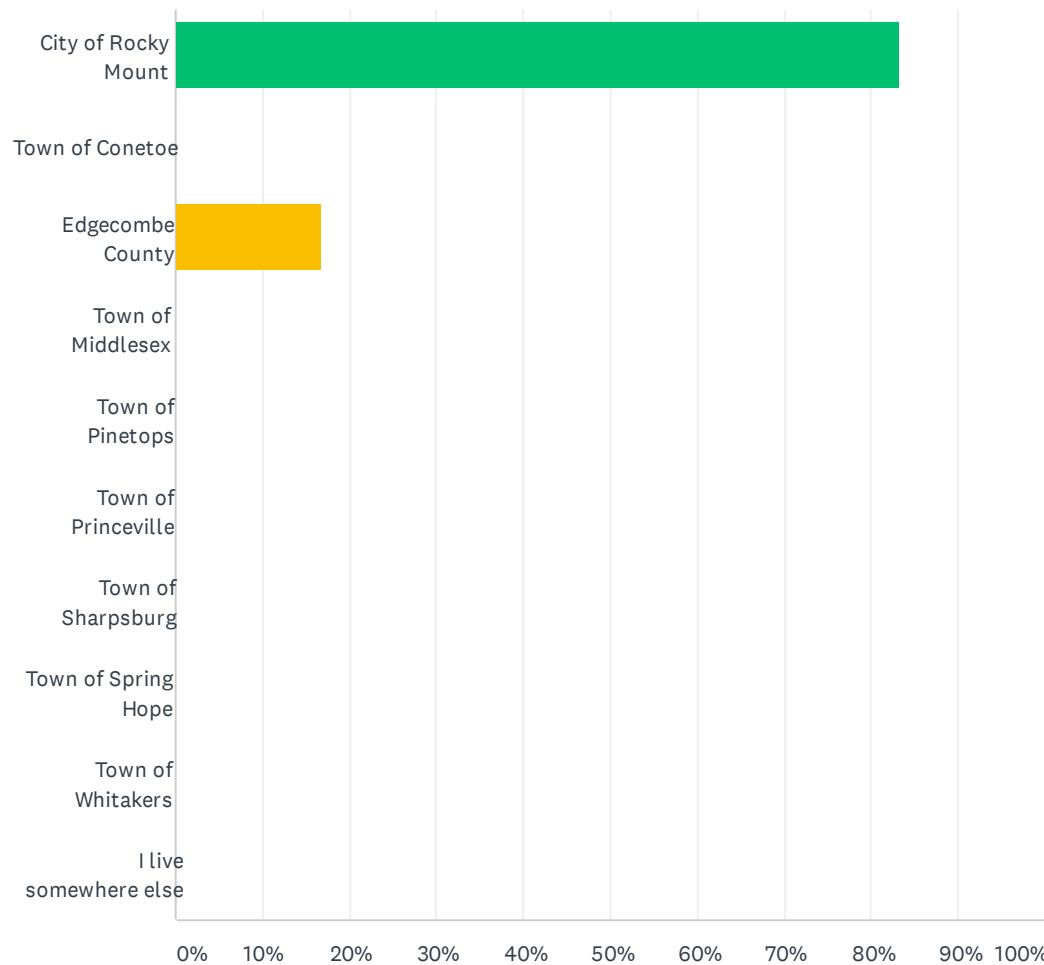


FOR MORE
INFORMATION

Cornelia McGee, MPA
Community Development Administrator
(252) 972-1178
cornelia.mcgee-anthony@rockymountnc.gov

Q1 Where do you live?

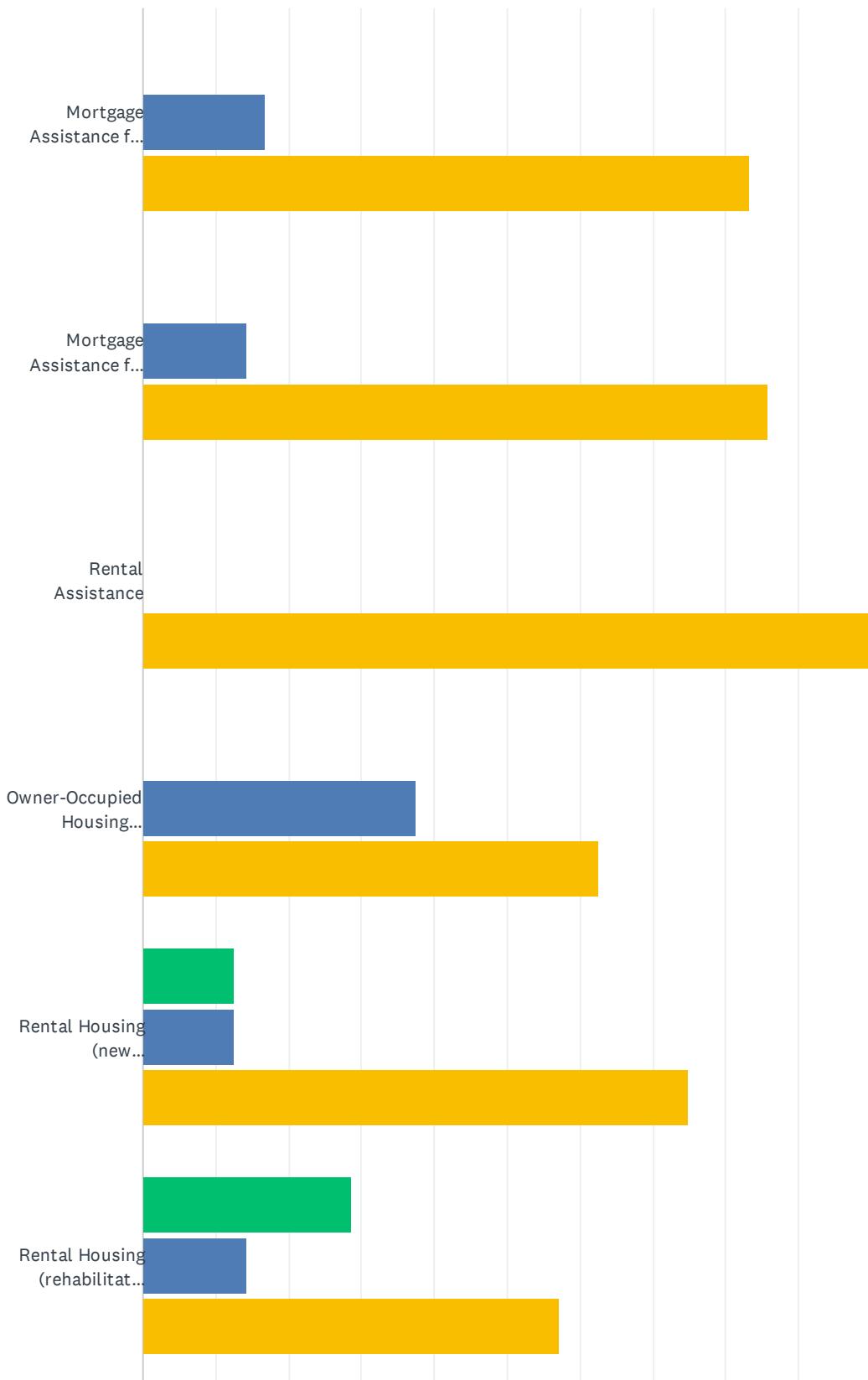
Answered: 6 Skipped: 2

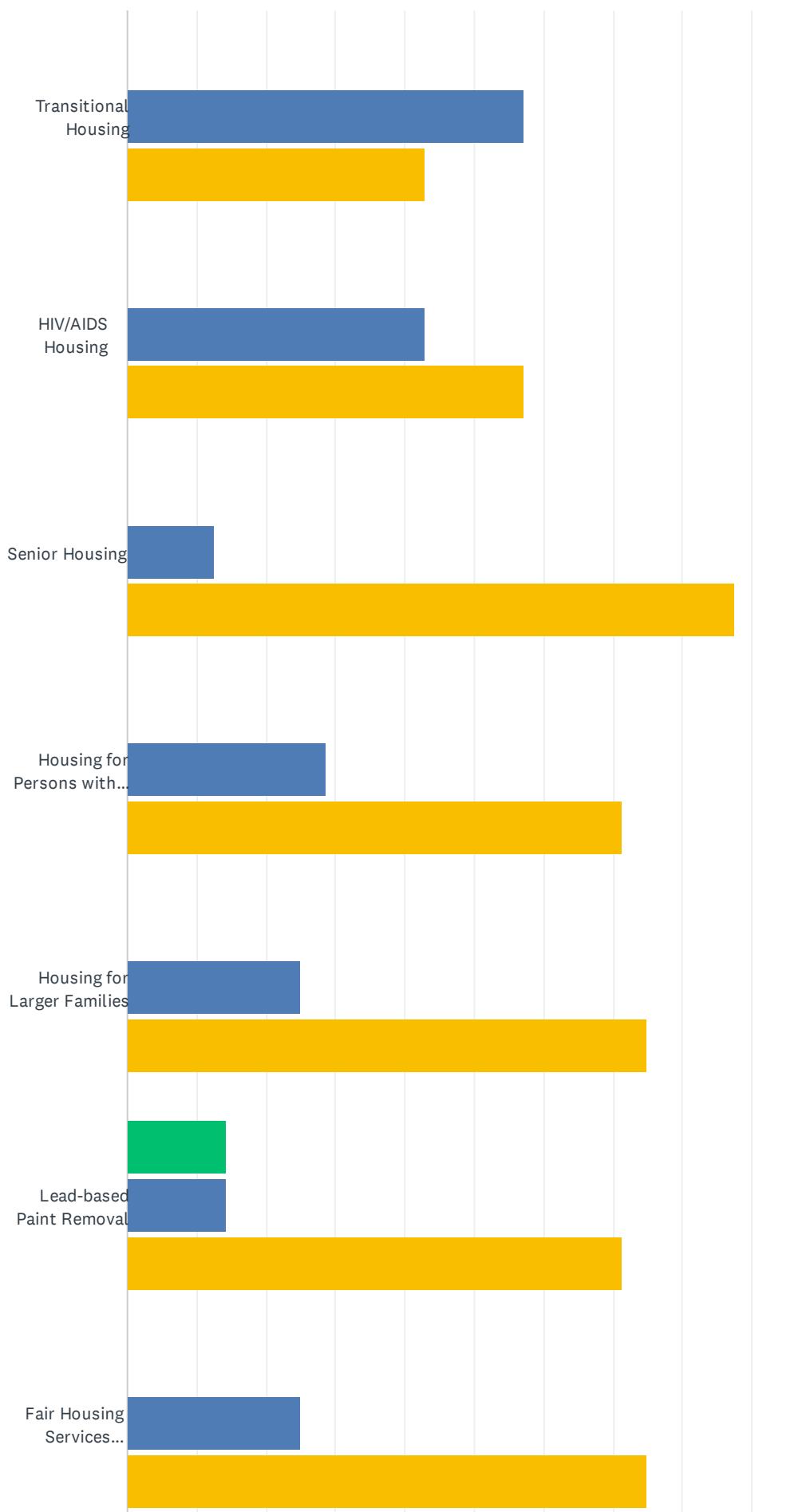


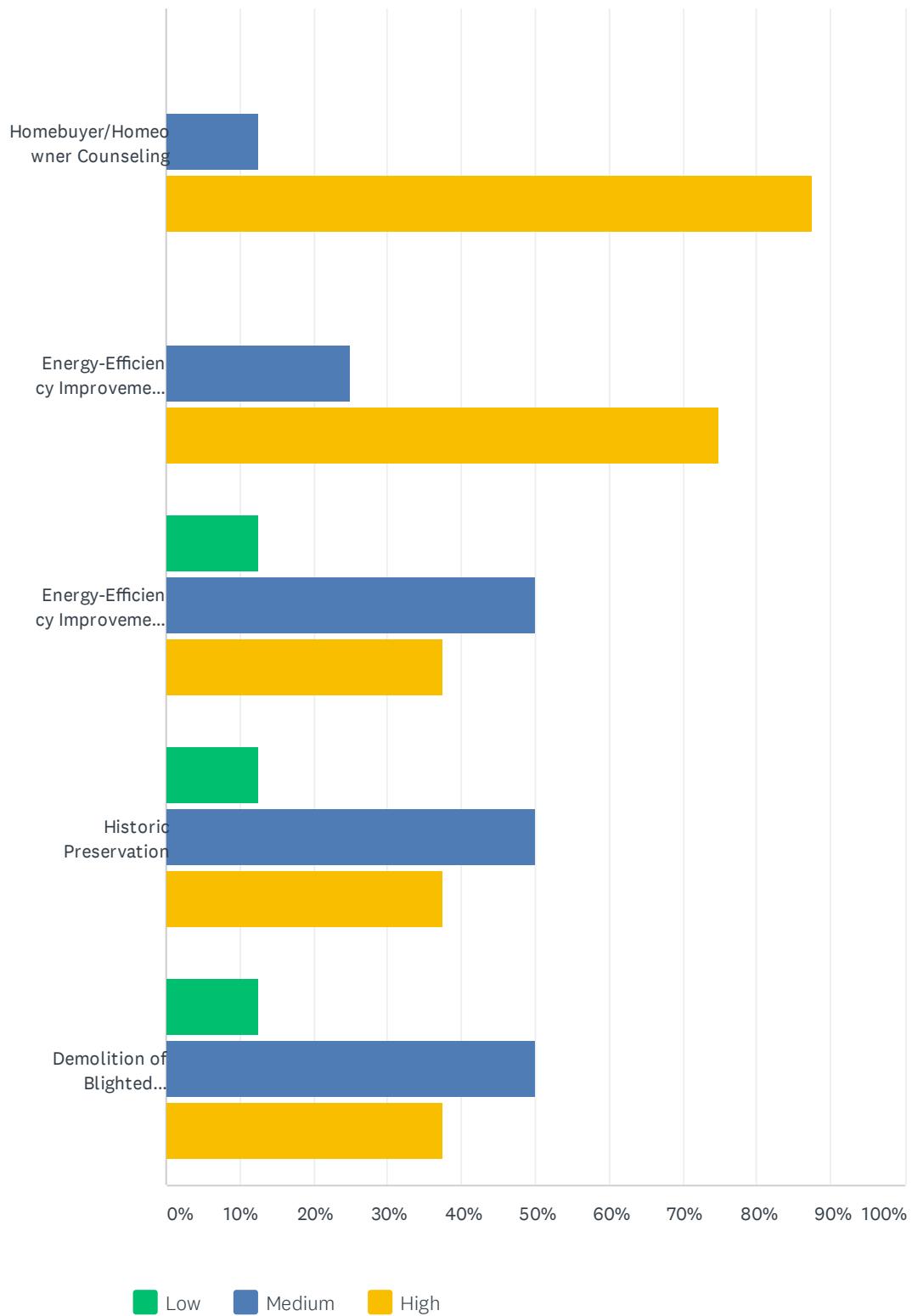
ANSWER CHOICES	RESPONSES
City of Rocky Mount	83.33% 5
Town of Conetoe	0.00% 0
Edgecombe County	16.67% 1
Town of Middlesex	0.00% 0
Town of Pinetops	0.00% 0
Town of Princeville	0.00% 0
Town of Sharpsburg	0.00% 0
Town of Spring Hope	0.00% 0
Town of Whitakers	0.00% 0
I live somewhere else	0.00% 0
TOTAL	6

Q2 In your opinion, what priority should be assigned to each of the following housing activities?

Answered: 8 Skipped: 0





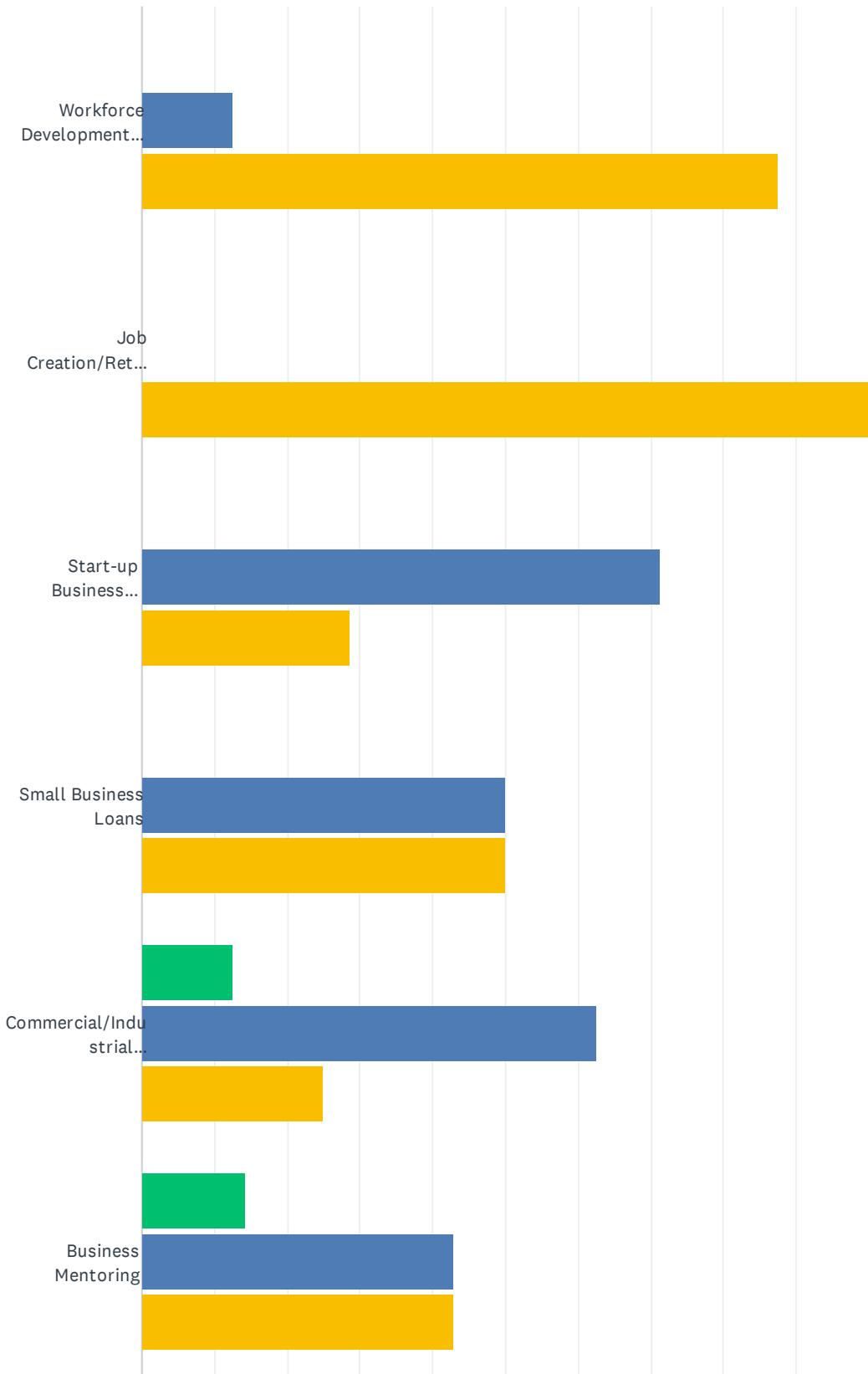


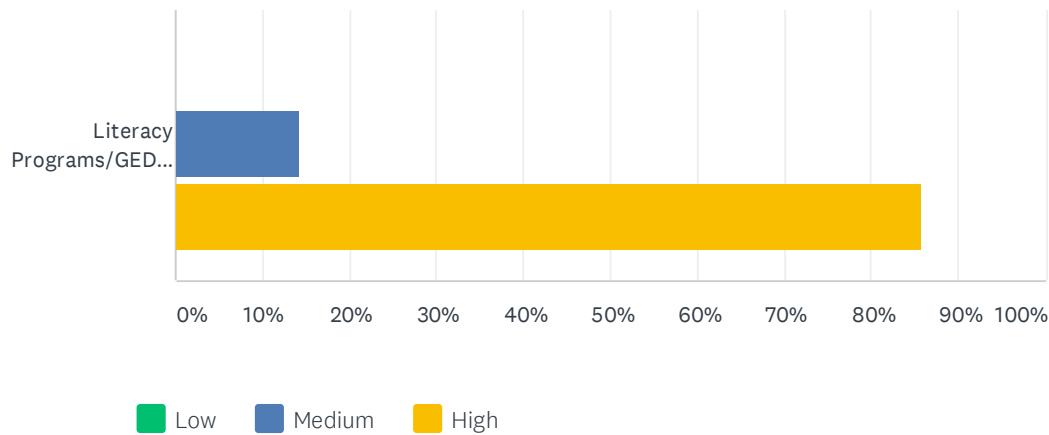
■ Low ■ Medium ■ High

	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Mortgage Assistance for Homeowners	0.00% 0	16.67% 1	83.33% 5	6	2.83
Mortgage Assistance for Homebuyers	0.00% 0	14.29% 1	85.71% 6	7	2.86
Rental Assistance	0.00% 0	0.00% 0	100.00% 8	8	3.00
Owner-Occupied Housing Rehabilitation	0.00% 0	37.50% 3	62.50% 5	8	2.63
Rental Housing (new construction)	12.50% 1	12.50% 1	75.00% 6	8	2.63
Rental Housing (rehabilitation)	28.57% 2	14.29% 1	57.14% 4	7	2.29
Transitional Housing	0.00% 0	57.14% 4	42.86% 3	7	2.43
HIV/AIDS Housing	0.00% 0	42.86% 3	57.14% 4	7	2.57
Senior Housing	0.00% 0	12.50% 1	87.50% 7	8	2.88
Housing for Persons with Disabilities	0.00% 0	28.57% 2	71.43% 5	7	2.71
Housing for Larger Families	0.00% 0	25.00% 2	75.00% 6	8	2.75
Lead-based Paint Removal	14.29% 1	14.29% 1	71.43% 5	7	2.57
Fair Housing Services (education, outreach and help with filing discrimination complaints)	0.00% 0	25.00% 2	75.00% 6	8	2.75
Homebuyer/Homeowner Counseling	0.00% 0	12.50% 1	87.50% 7	8	2.88
Energy-Efficiency Improvements for Homeowners	0.00% 0	25.00% 2	75.00% 6	8	2.75
Energy-Efficiency Improvements for Rental Units	12.50% 1	50.00% 4	37.50% 3	8	2.25
Historic Preservation	12.50% 1	50.00% 4	37.50% 3	8	2.25
Demolition of Blighted Structures	12.50% 1	50.00% 4	37.50% 3	8	2.25

Q3 In your opinion, what priority should be assigned to each of the following economic development activities?

Answered: 8 Skipped: 0

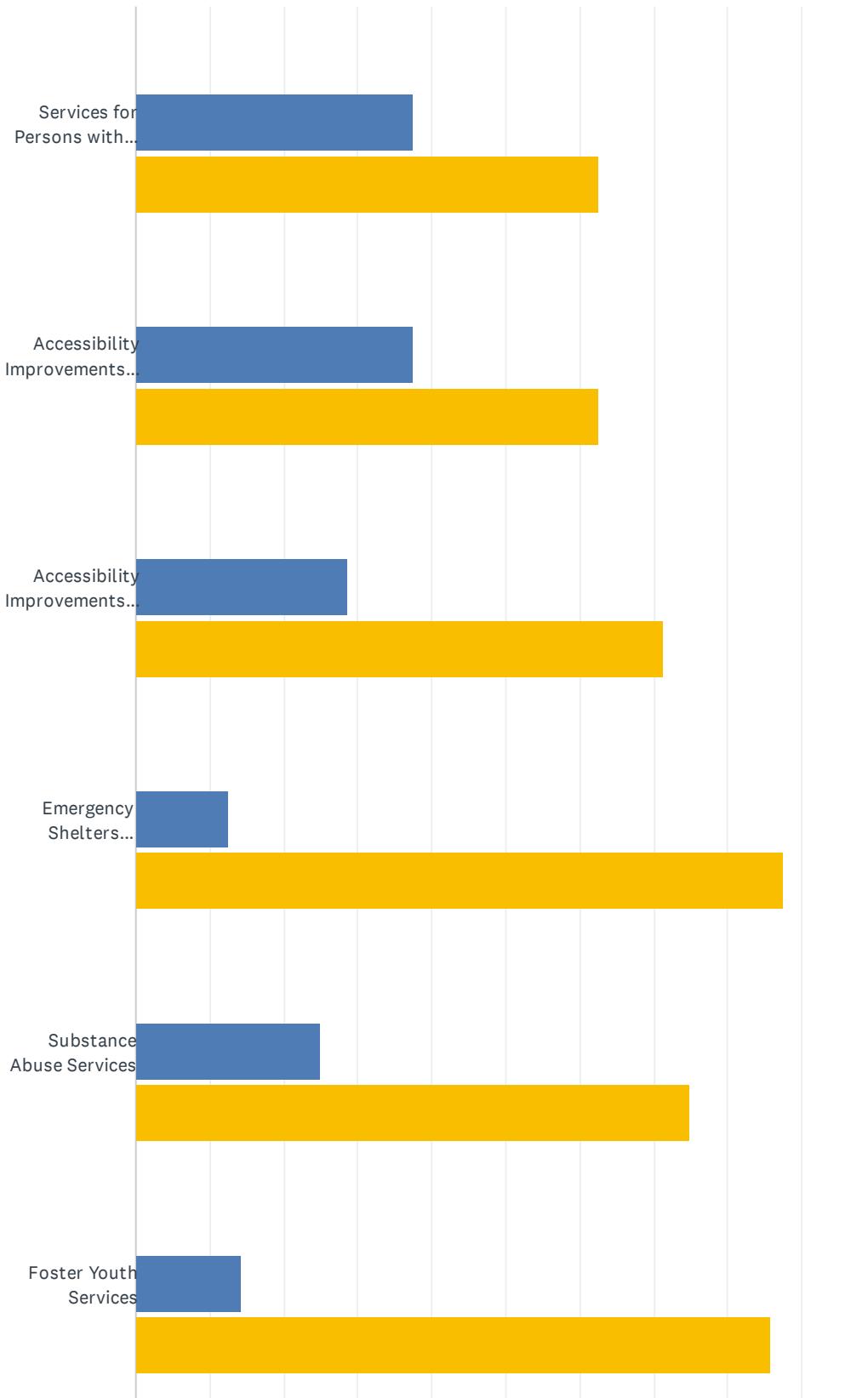


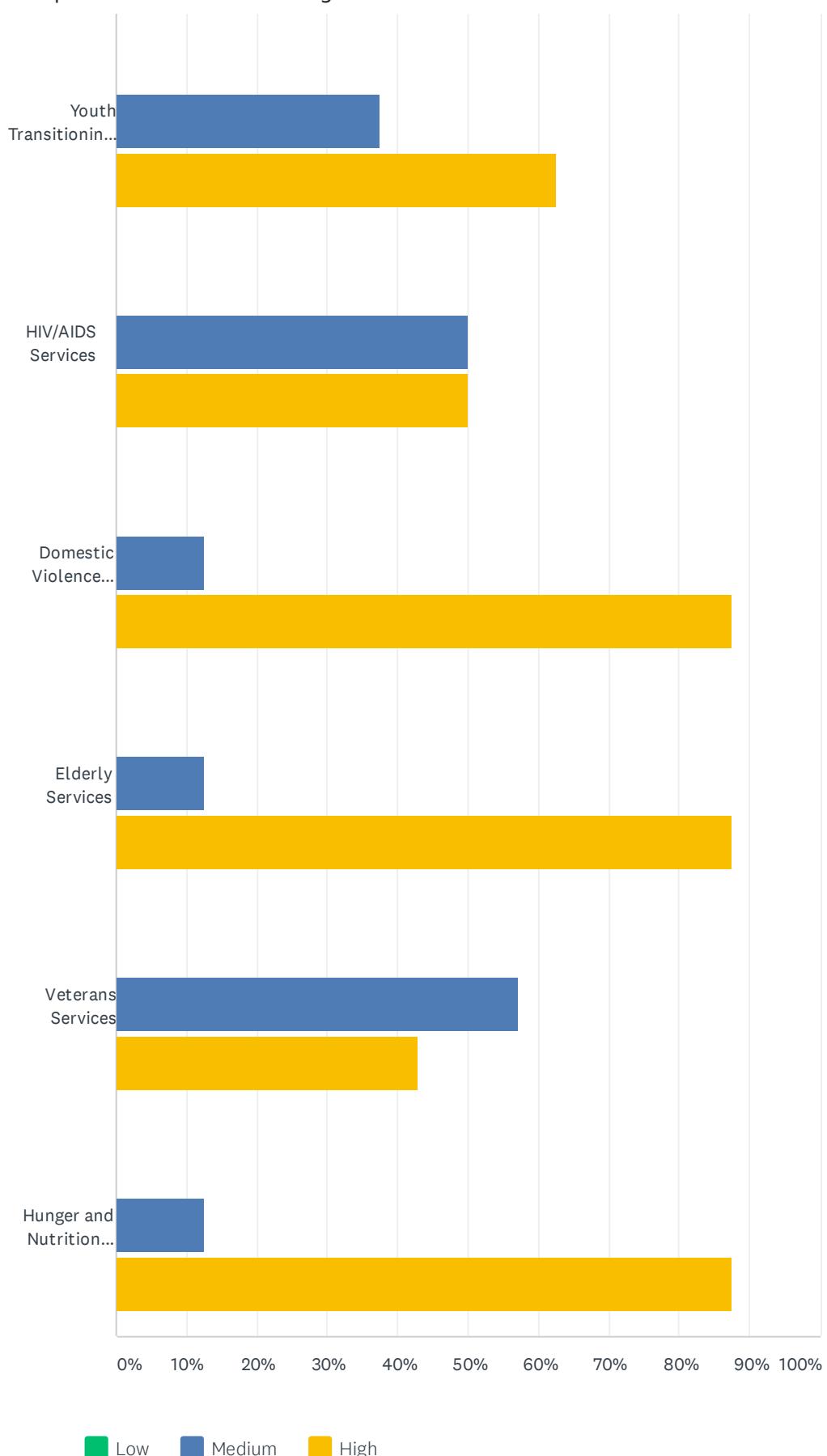


	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Workforce Development Programs	0.00% 0	12.50% 1	87.50% 7	8	2.88
Job Creation/Retention	0.00% 0	0.00% 0	100.00% 8	8	3.00
Start-up Business Assistance	0.00% 0	71.43% 5	28.57% 2	7	2.29
Small Business Loans	0.00% 0	50.00% 4	50.00% 4	8	2.50
Commercial/Industrial Rehabilitation	12.50% 1	62.50% 5	25.00% 2	8	2.13
Business Mentoring	14.29% 1	42.86% 3	42.86% 3	7	2.29
Literacy Programs/GED Preparedness	0.00% 0	14.29% 1	85.71% 6	7	2.86

Q4 In your opinion, what priority should be assigned to each of the following special needs and services activities?

Answered: 8 Skipped: 0



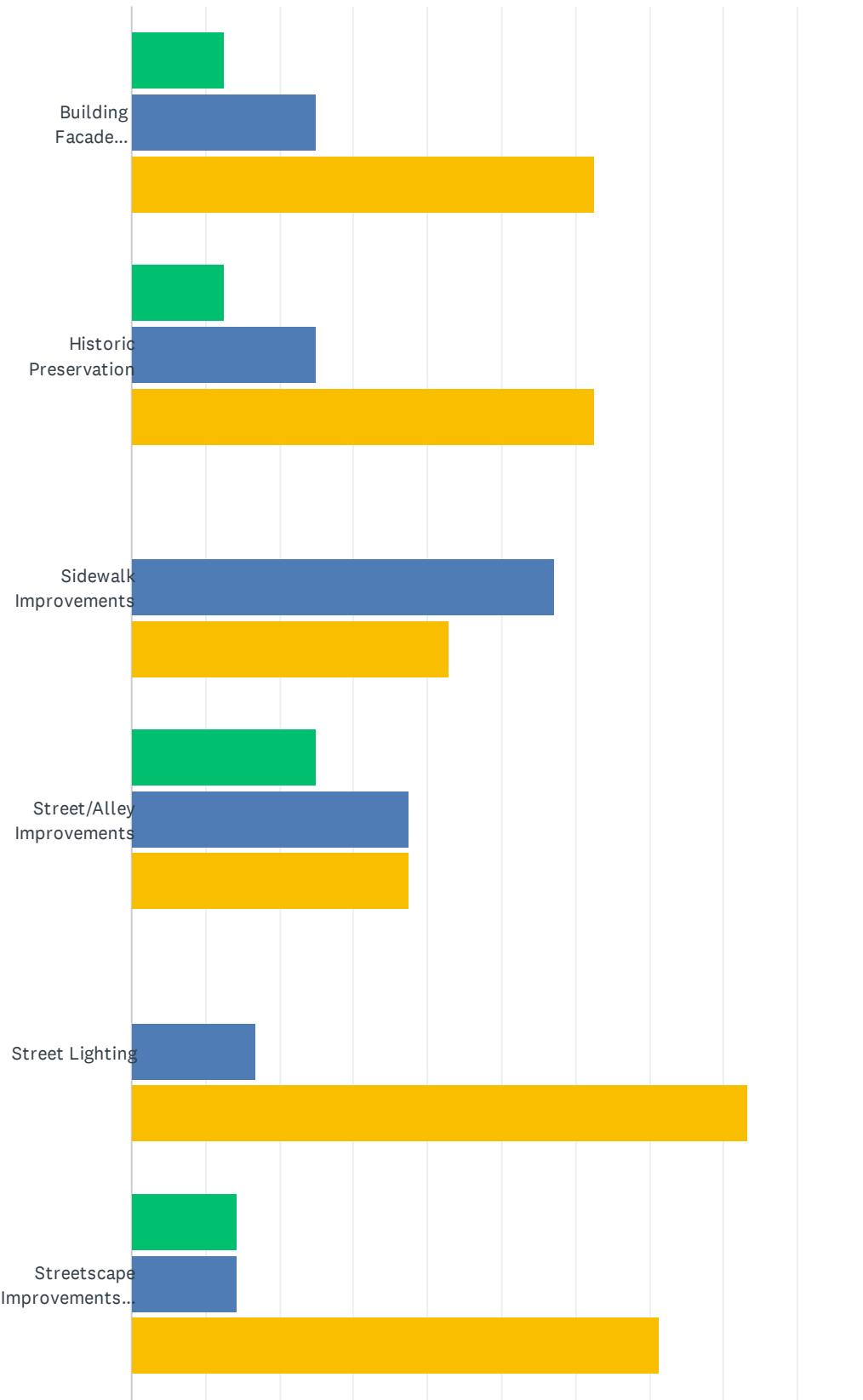


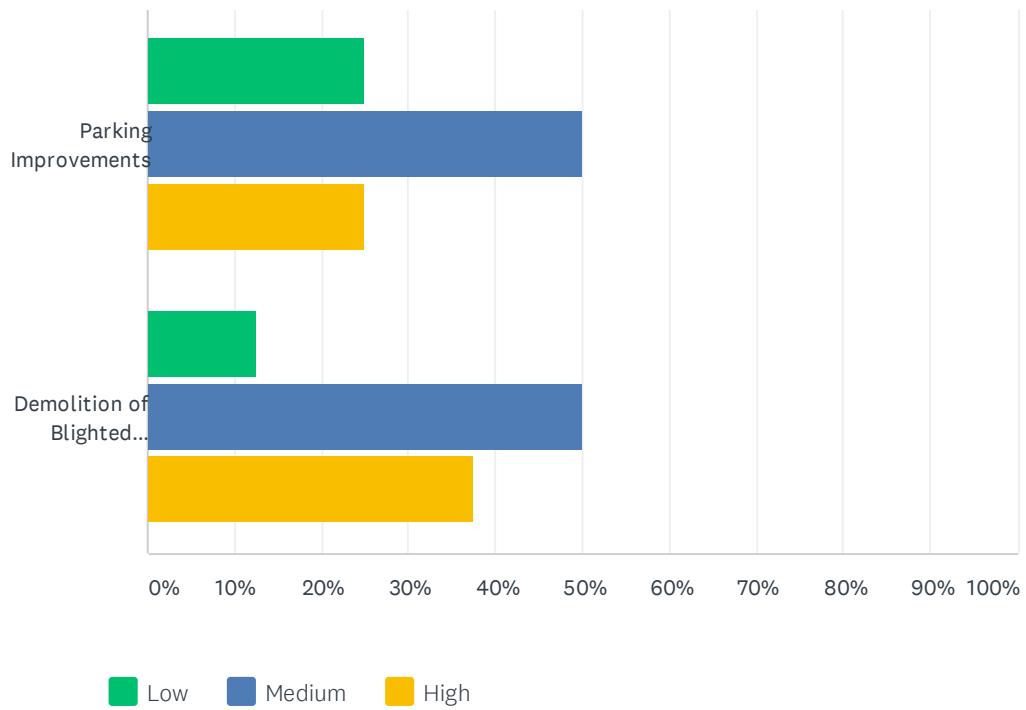
Low Medium High

	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Services for Persons with Disabilities	0.00% 0	37.50% 3	62.50% 5	8	2.63
Accessibility Improvements for Persons with Disabilities (residential)	0.00% 0	37.50% 3	62.50% 5	8	2.63
Accessibility Improvements for Persons with Disabilities (public facilities)	0.00% 0	28.57% 2	71.43% 5	7	2.71
Emergency Shelters Homeless Services Mental Health Services	0.00% 0	12.50% 1	87.50% 7	8	2.88
Substance Abuse Services	0.00% 0	25.00% 2	75.00% 6	8	2.75
Foster Youth Services	0.00% 0	14.29% 1	85.71% 6	7	2.86
Youth Transitioning Out of Foster Care	0.00% 0	37.50% 3	62.50% 5	8	2.63
HIV/AIDS Services	0.00% 0	50.00% 4	50.00% 4	8	2.50
Domestic Violence Services	0.00% 0	12.50% 1	87.50% 7	8	2.88
Elderly Services	0.00% 0	12.50% 1	87.50% 7	8	2.88
Veterans Services	0.00% 0	57.14% 4	42.86% 3	7	2.43
Hunger and Nutrition Services	0.00% 0	12.50% 1	87.50% 7	8	2.88

Q5 In your opinion, what priority should be assigned to each of the following neighborhood / commercial district revitalization activities?

Answered: 8 Skipped: 0

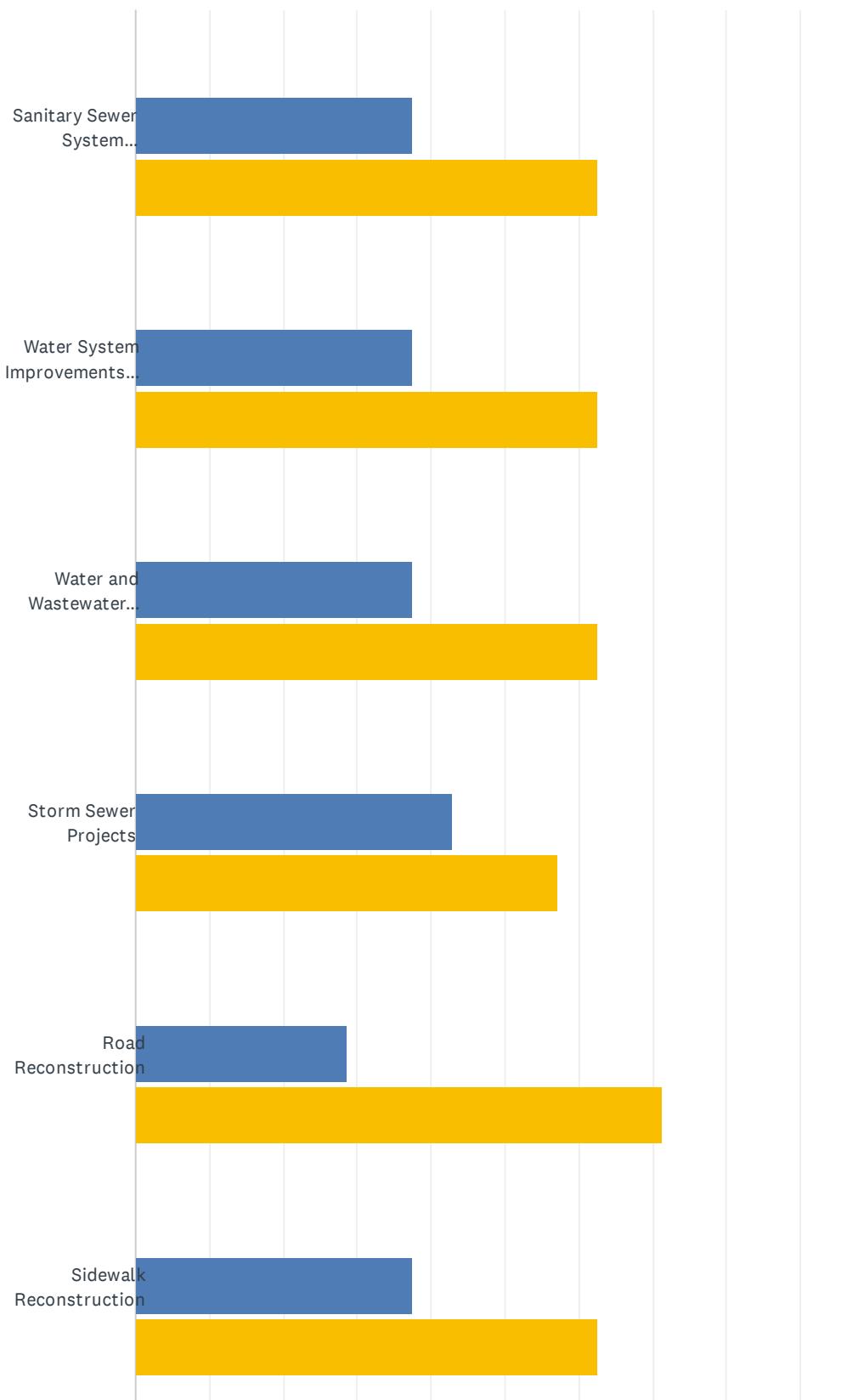


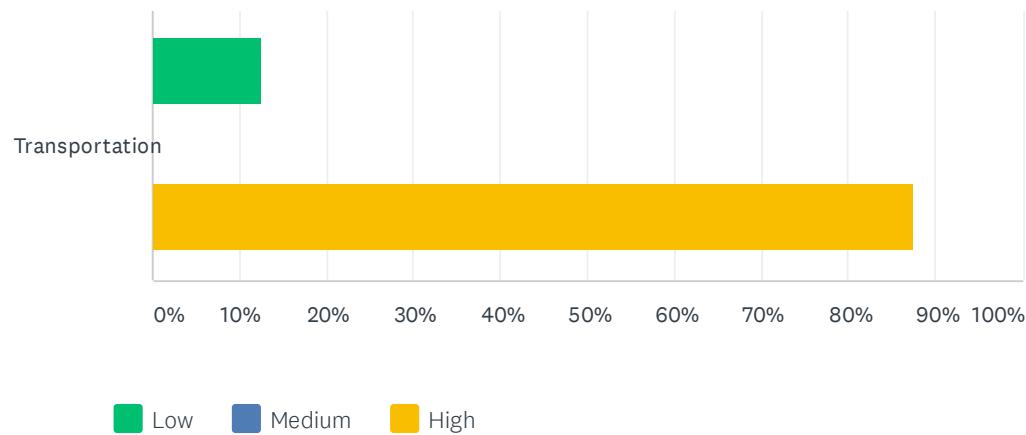


	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Building Facade (Exterior) Improvements	12.50% 1	25.00% 2	62.50% 5	8	2.50
Historic Preservation	12.50% 1	25.00% 2	62.50% 5	8	2.50
Sidewalk Improvements	0.00% 0	57.14% 4	42.86% 3	7	2.43
Street/Alley Improvements	25.00% 2	37.50% 3	37.50% 3	8	2.13
Street Lighting	0.00% 0	16.67% 1	83.33% 5	6	2.83
Streetscape Improvements (including landscaping)	14.29% 1	14.29% 1	71.43% 5	7	2.57
Parking Improvements	25.00% 2	50.00% 4	25.00% 2	8	2.00
Demolition of Blighted Structures	12.50% 1	50.00% 4	37.50% 3	8	2.25

Q6 In your opinion, what priority should be assigned to the following public infrastructure projects?

Answered: 8 Skipped: 0

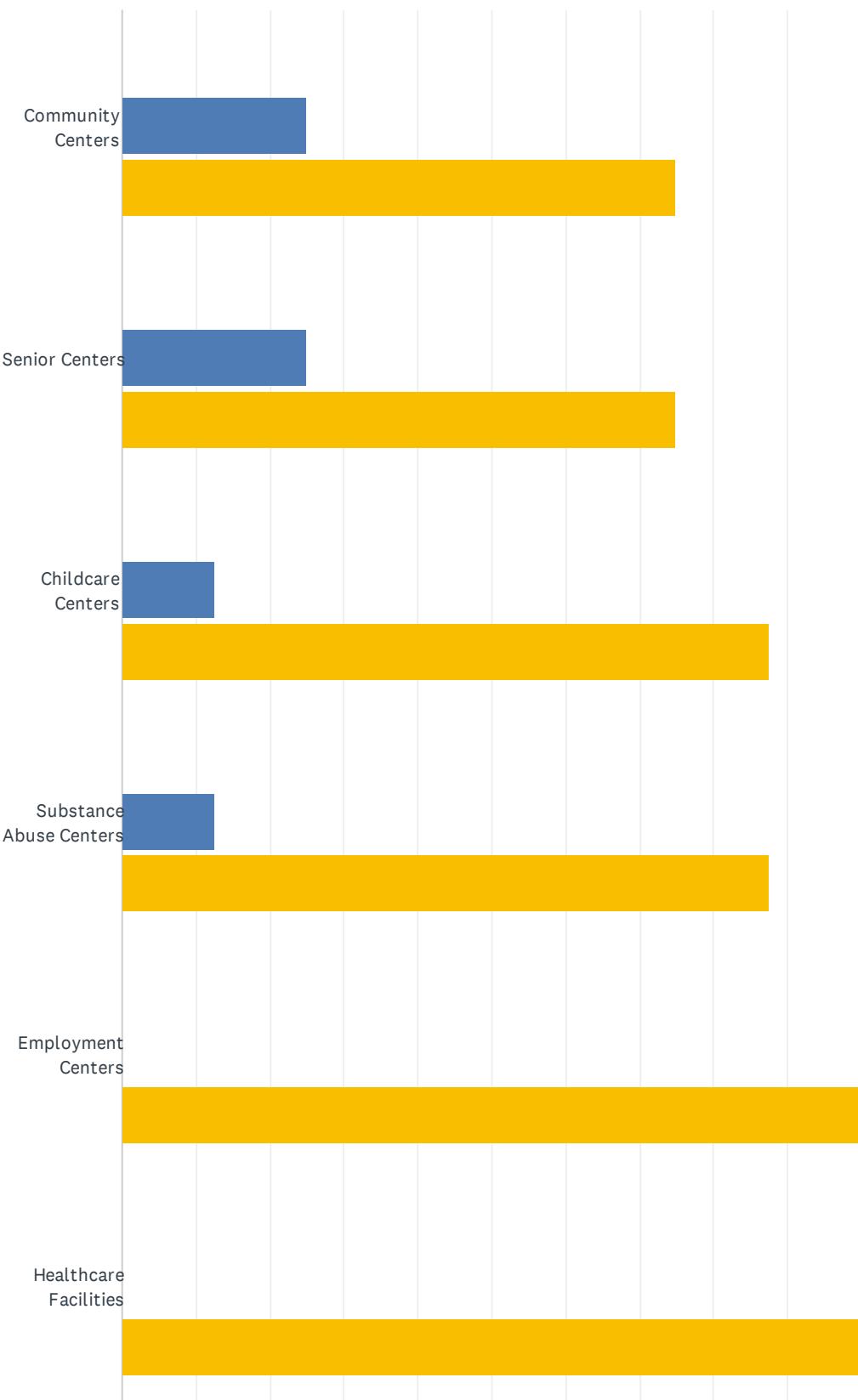


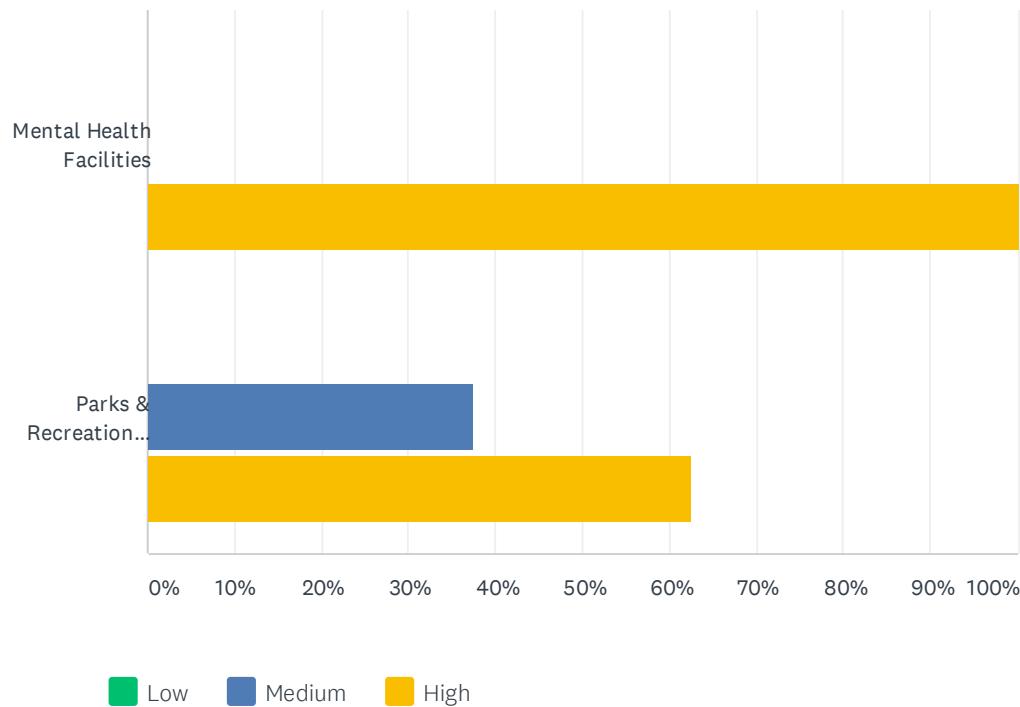


	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Sanitary Sewer System Improvements/Extensions	0.00% 0	37.50% 3	62.50% 5	8	2.63
Water System Improvements/Extensions	0.00% 0	37.50% 3	62.50% 5	8	2.63
Water and Wastewater Treatment Facilities	0.00% 0	37.50% 3	62.50% 5	8	2.63
Storm Sewer Projects	0.00% 0	42.86% 3	57.14% 4	7	2.57
Road Reconstruction	0.00% 0	28.57% 2	71.43% 5	7	2.71
Sidewalk Reconstruction	0.00% 0	37.50% 3	62.50% 5	8	2.63
Transportation	12.50% 1	0.00% 0	87.50% 7	8	2.75

Q7 In your opinion, what priority should be assigned to each of the following community facilities?

Answered: 8 Skipped: 0





	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Community Centers	0.00% 0	25.00% 2	75.00% 6	8	2.75
Senior Centers	0.00% 0	25.00% 2	75.00% 6	8	2.75
Childcare Centers	0.00% 0	12.50% 1	87.50% 7	8	2.88
Substance Abuse Centers	0.00% 0	12.50% 1	87.50% 7	8	2.88
Employment Centers	0.00% 0	0.00% 0	100.00% 8	8	3.00
Healthcare Facilities	0.00% 0	0.00% 0	100.00% 8	8	3.00
Mental Health Facilities	0.00% 0	0.00% 0	100.00% 8	8	3.00
Parks & Recreation Facilities	0.00% 0	37.50% 3	62.50% 5	8	2.63

Q8 Please provide any additional comments or feedback related to housing, economic development, and community development needs in your municipality.

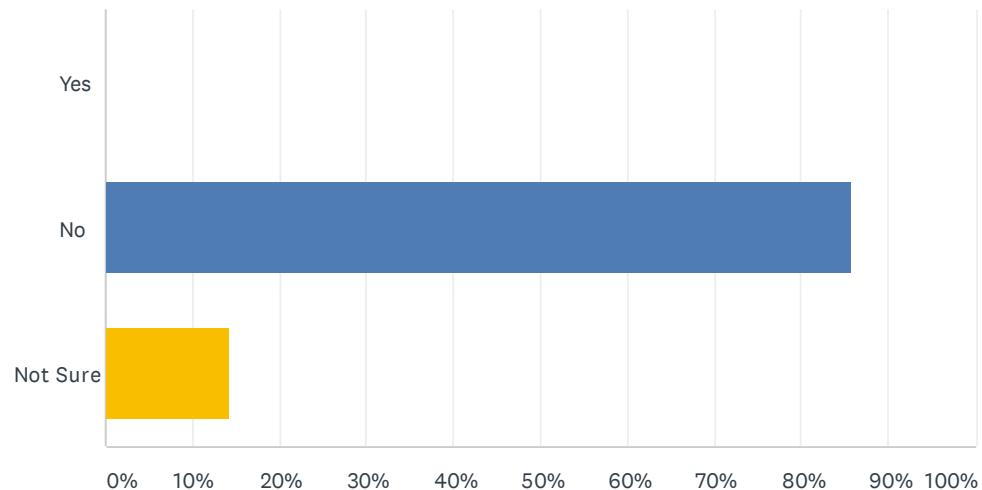
Answered: 5 Skipped: 3

Q9 In your opinion, what should be the highest priority needs in your municipality over the next three years?

Answered: 8 Skipped: 0

Q10 Have you ever felt that you were discriminated against when you were looking for housing anywhere in the City of Rocky Mount or in a community within the Down East HOME Consortium?

Answered: 7 Skipped: 1



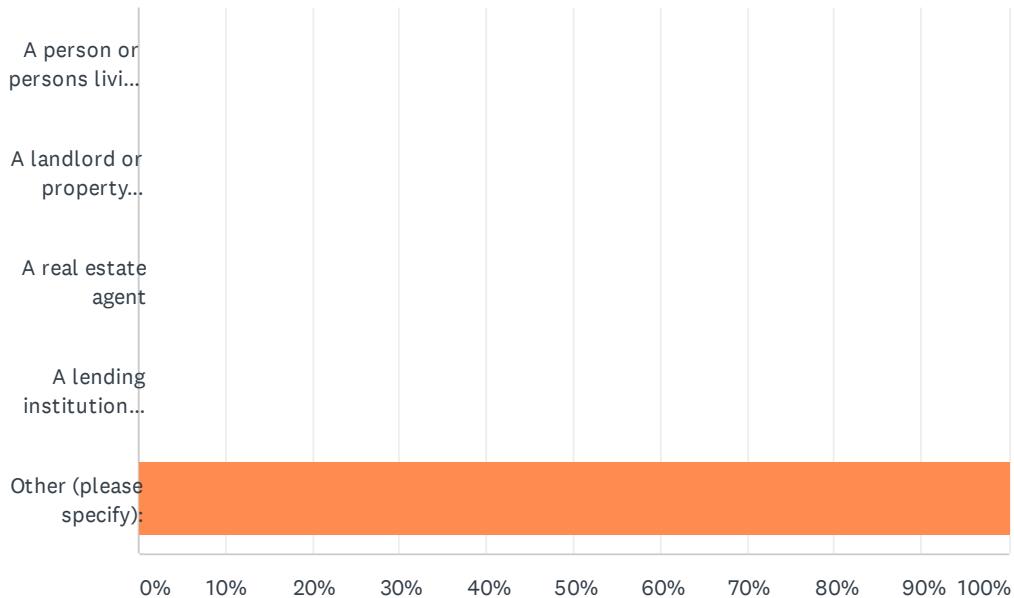
ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	85.71%	6
Not Sure	14.29%	1
TOTAL		7

Q11 Please specify the name of the area where you felt that you were discriminated against when you were looking for housing:

Answered: 1 Skipped: 7

Q12 Which of the following best describes the person who may have discriminated against you?

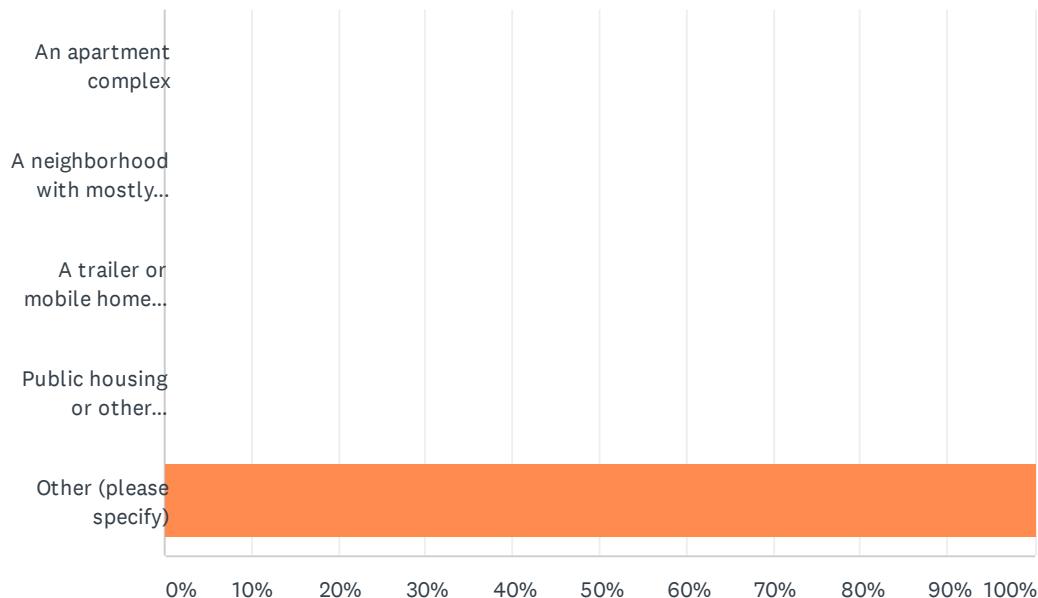
Answered: 1 Skipped: 7



ANSWER CHOICES	RESPONSES	
A person or persons living in the neighborhood	0.00%	0
A landlord or property manager	0.00%	0
A real estate agent	0.00%	0
A lending institution (bank, credit union, etc.)	0.00%	0
Other (please specify):	100.00%	1
TOTAL		1

Q13 Which of the following best describes the location where the act of the discrimination may have occurred?

Answered: 1 Skipped: 7



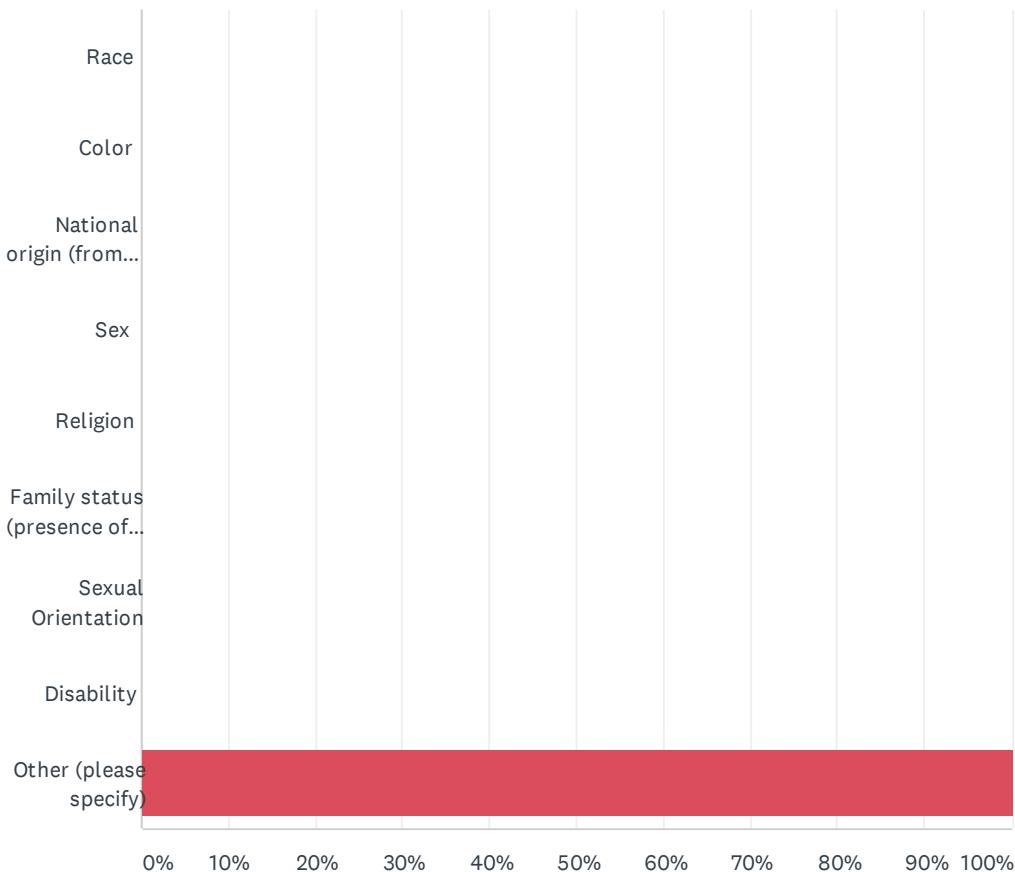
ANSWER CHOICES	RESPONSES	
An apartment complex	0.00%	0
A neighborhood with mostly single family homes	0.00%	0
A trailer or mobile home park	0.00%	0
Public housing or other housing where your rent was only a portion of your income	0.00%	0
Other (please specify)	100.00%	1
TOTAL		1

Q14 Please explain how you were discriminated against:

Answered: 1 Skipped: 7

Q15 On what basis do you believe you were discriminated against? Check all that apply:

Answered: 1 Skipped: 7



ANSWER CHOICES	RESPONSES	
Race	0.00%	0
Color	0.00%	0
National origin (from a country other than the United States)	0.00%	0
Sex	0.00%	0
Religion	0.00%	0
Family status (presence of children)	0.00%	0
Sexual Orientation	0.00%	0
Disability	0.00%	0
Other (please specify)	100.00%	1
Total Respondents: 1		

Q16 Did you report the incident of possible discrimination?

Answered: 0 Skipped: 8

 No matching responses.

ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	0.00%	0
TOTAL		0

Q17 Who did you contact to report the incident of possible discrimination?

Answered: 1 Skipped: 7

Q18 Why didn't you report the incident of possible discrimination?

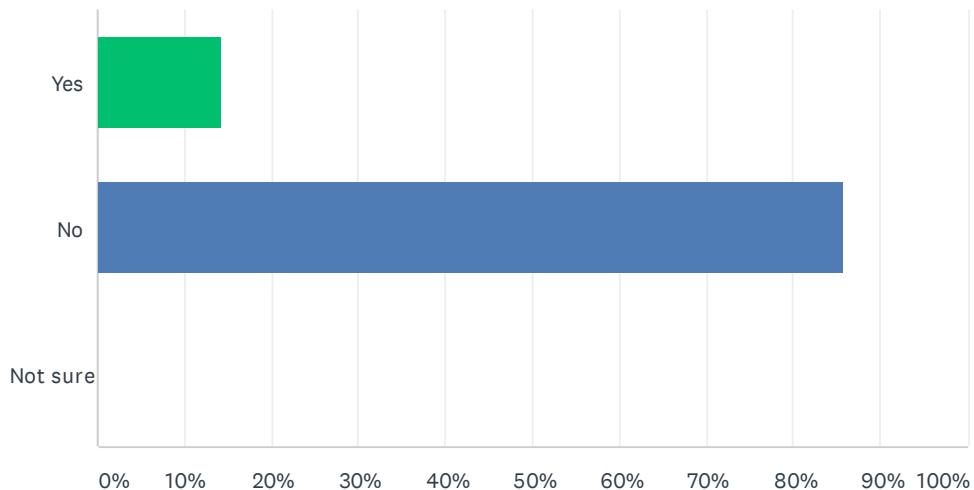
Answered: 0 Skipped: 8

⚠ No matching responses.

ANSWER CHOICES	RESPONSES	
Didn't know who to report it to	0.00%	0
Afraid of retaliation	0.00%	0
Too much trouble	0.00%	0
Didn't think it would make a difference	0.00%	0
Other reason (please specify)	0.00%	0
TOTAL		0

Q19 Have you ever been denied “reasonable accommodation” (flexibility) by a landlord related to housing?

Answered: 7 Skipped: 1



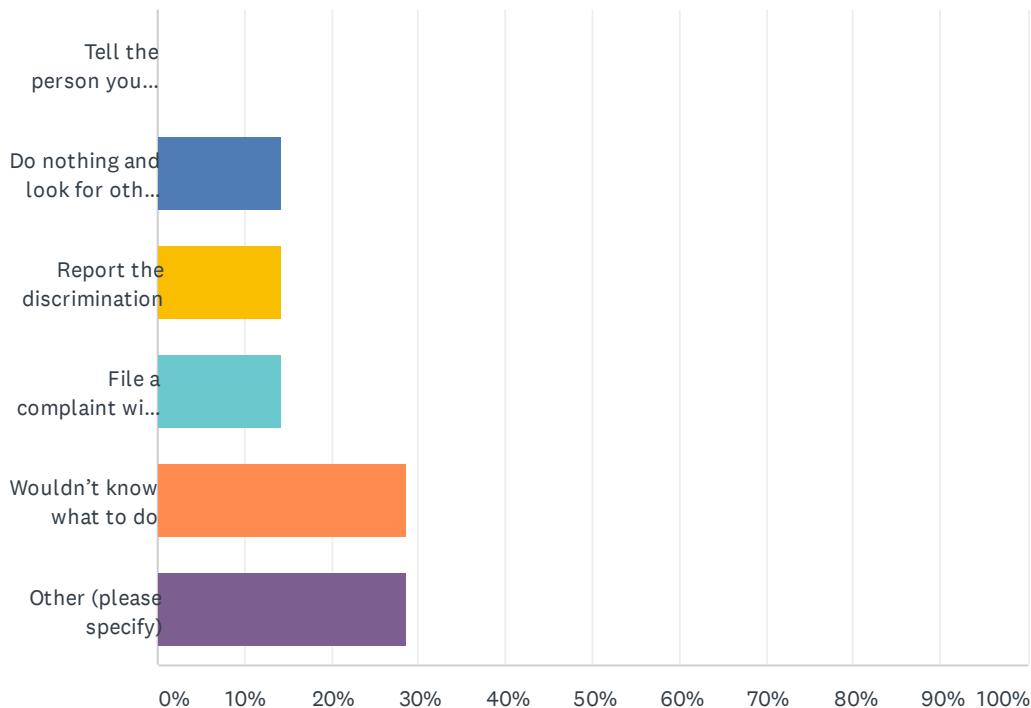
ANSWER CHOICES	RESPONSES	
Yes	14.29%	1
No	85.71%	6
Not sure	0.00%	0
TOTAL		7

Q20 If you answered yes, what was your request?

Answered: 1 Skipped: 7

Q21 What would you do if you felt you were discriminated against while seeking housing?

Answered: 7 Skipped: 1



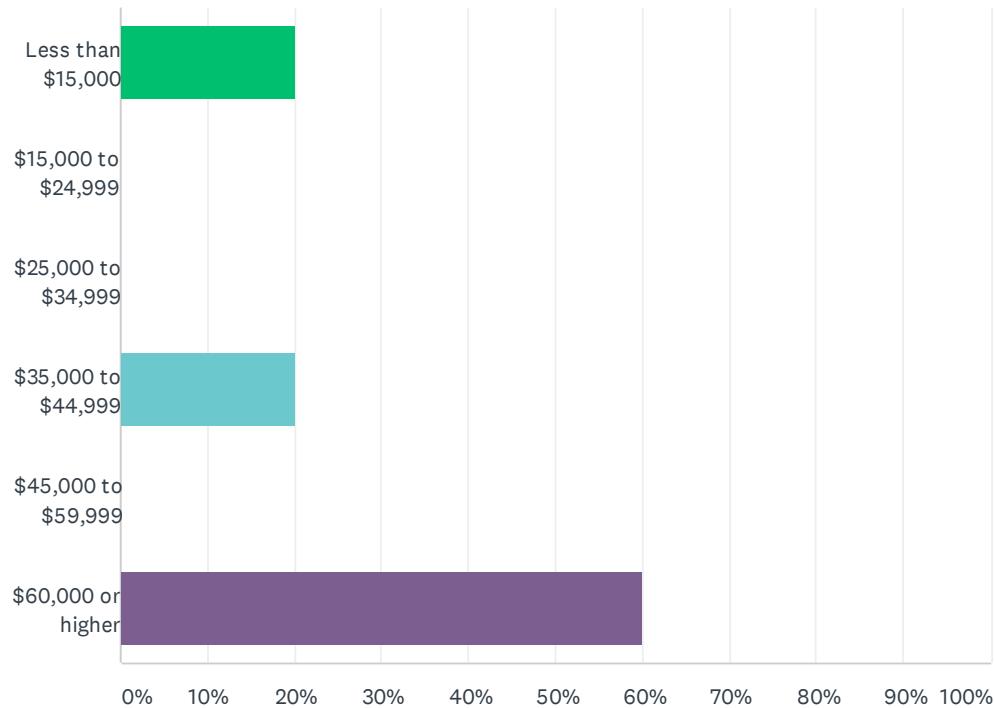
ANSWER CHOICES	RESPONSES	
Tell the person you believe they were discriminating against you	0.00%	0
Do nothing and look for other housing	14.29%	1
Report the discrimination	14.29%	1
File a complaint with a lawyer	14.29%	1
Wouldn't know what to do	28.57%	2
Other (please specify)	28.57%	2
TOTAL		7

Q22 If you wanted to report the discrimination, who would you report it to?

Answered: 6 Skipped: 2

Q23 What is your household's yearly income?

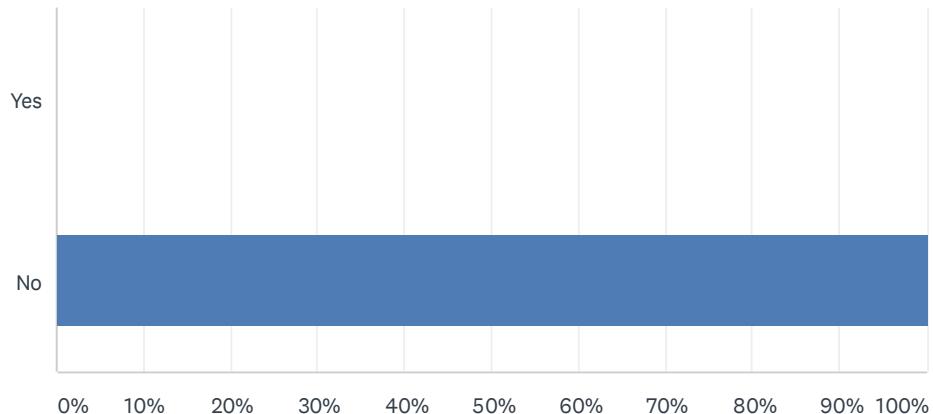
Answered: 5 Skipped: 3



ANSWER CHOICES	RESPONSES	
Less than \$15,000	20.00%	1
\$15,000 to \$24,999	0.00%	0
\$25,000 to \$34,999	0.00%	0
\$35,000 to \$44,999	20.00%	1
\$45,000 to \$59,999	0.00%	0
\$60,000 or higher	60.00%	3
TOTAL		5

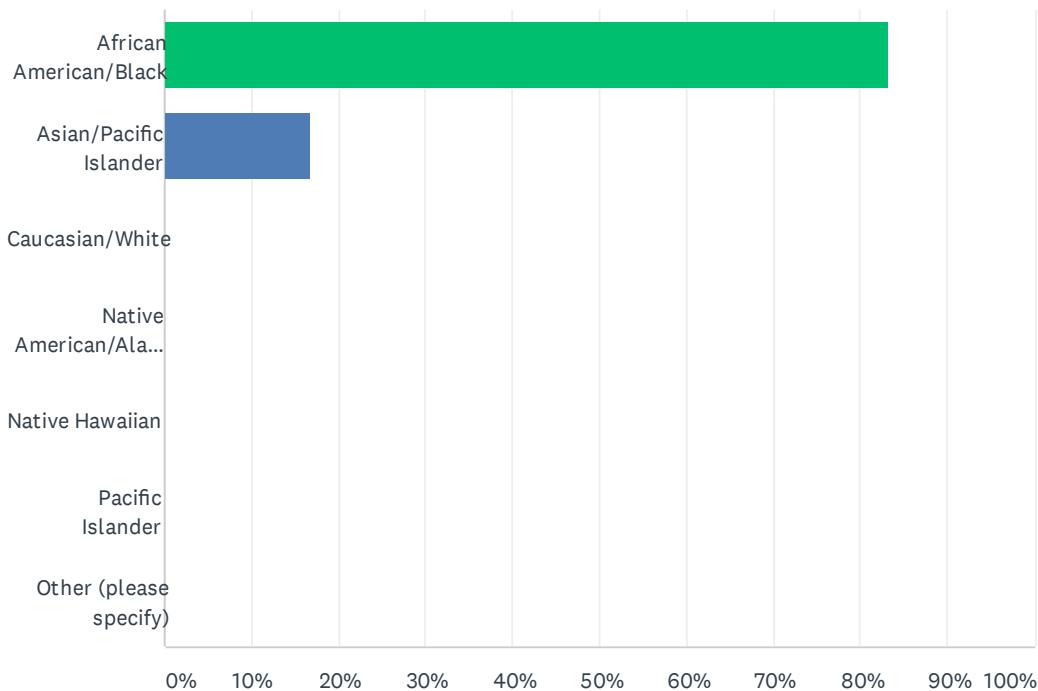
Q24 Are you Hispanic or Latino?

Answered: 5 Skipped: 3



Q25 What is your race? If you are multi-racial, please check all that apply.

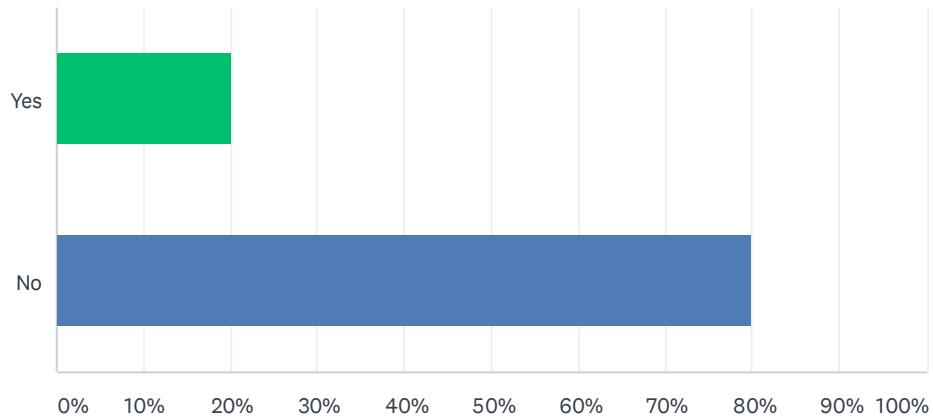
Answered: 6 Skipped: 2



ANSWER CHOICES	RESPONSES
African American/Black	83.33% 5
Asian/Pacific Islander	16.67% 1
Caucasian/White	0.00% 0
Native American/Alaskan Native	0.00% 0
Native Hawaiian	0.00% 0
Pacific Islander	0.00% 0
Other (please specify)	0.00% 0
Total Respondents: 6	

Q26 Does your household include a person with a disability?

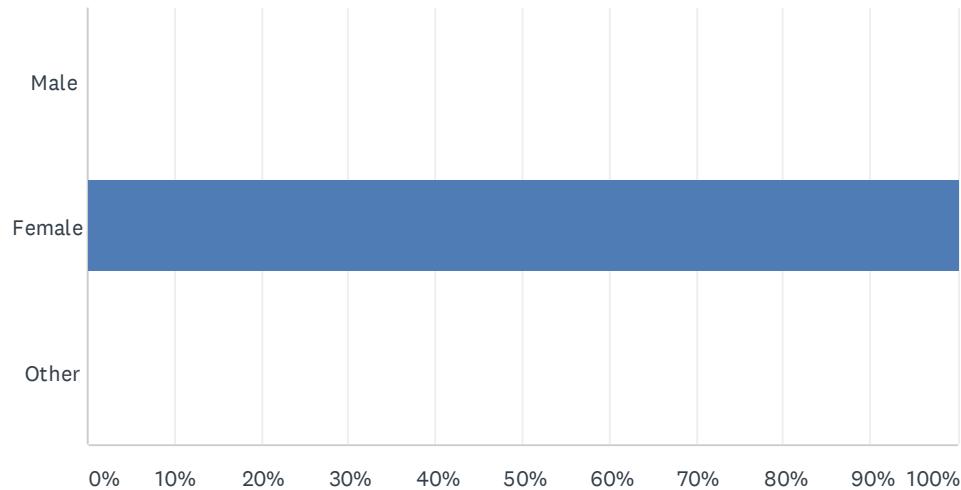
Answered: 5 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	20.00%	1
No	80.00%	4
TOTAL		5

Q27 What is your gender?

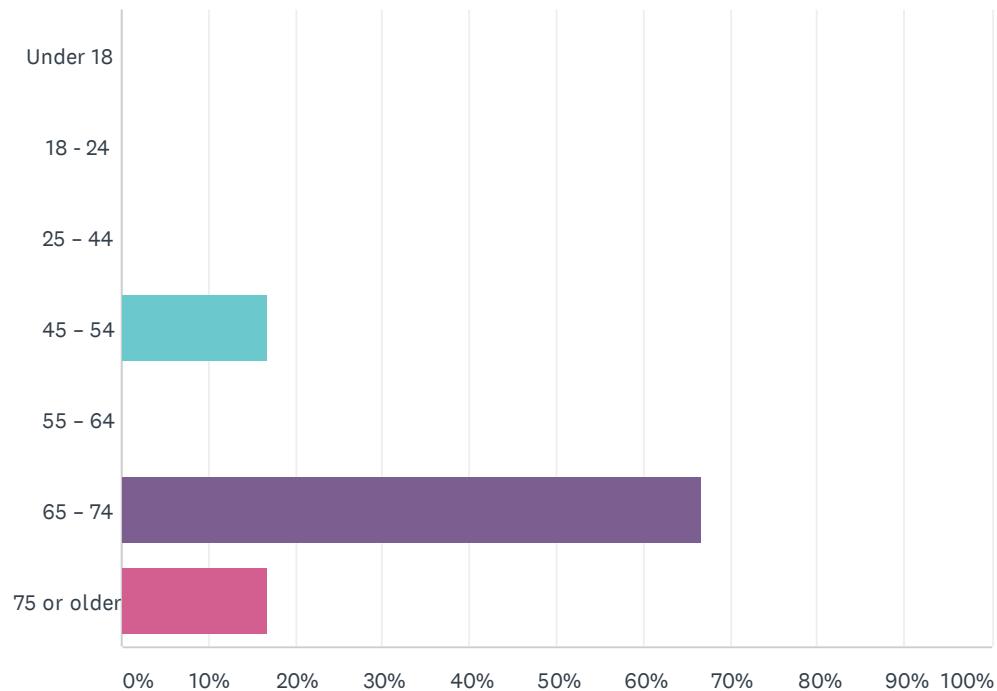
Answered: 6 Skipped: 2



ANSWER CHOICES	RESPONSES	
Male	0.00%	0
Female	100.00%	6
Other	0.00%	0
TOTAL		6

Q28 What is your age?

Answered: 6 Skipped: 2



ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18 - 24	0.00%	0
25 - 44	0.00%	0
45 - 54	16.67%	1
55 - 64	0.00%	0
65 - 74	66.67%	4
75 or older	16.67%	1
TOTAL		6

Legal Aid of North Carolina, Inc.

Wilson Office

208 East Goldsboro Street • P.O. Box 2684 • Wilson, NC 27894-2684
Phone: 252.291.6851 • 1.800.682.7902 • Fax: 252.291.6407

Serving low-income clients in Edgecombe, Greene, Lenoir, Nash, Wayne, and Wilson Counties

Yolanda L. Taylor, Esq.
Managing Attorney

www.legalaidnc.org

April 26, 2021

Ms. Cornelia McGee, Community Development Administrator
City of Rocky Mount
331 S. Franklin Street
PO Box 1180
Rocky Mount, NC 27802-1180

RE: Comments on The City of Rocky Mount's Draft 2021-2023 Consolidated Plan, Draft 2021 Annual Action Plan, and Draft Analysis of Impediments to Fair Housing Choice

Dear Ms. McGee:

The following comments on the City of Rocky Mount ("City") and the Down East HOME Consortium's (DEHC) Draft 2021-2023 Consolidated Plan ("Con Plan"), Draft 2021 Annual Action Plan ("AAP"), and Draft Analysis of Impediments to Fair Housing Choice ("AI") are offered by Legal Aid of North Carolina, Inc., ("LANC") on behalf of its client, the Steering Committee of the Community Academy. The client is a leadership body comprised of residents in the City's most blighted neighborhoods described as "targeted areas of opportunity" in the City's 2014 Crossroads to Prosperity Housing Study. On behalf of our client, LANC is thankful for the opportunity to engage in meaningful dialogue about the use of HUD federal funds and about ways to collaborate on the pathway toward equitable community development.

The Draft 2021-2023 Consolidated Plan

Housing Cost Burden

Based upon the Con Plan, the primary challenge facing the City of Rocky Mount is housing cost. Due to the lack of affordable housing for a substantial portion of Rocky Mount residents, 15.2% of the households are cost burdened which means that these households spend more than 30% of their income on housing costs. Further, 13.6% of households are severely cost burdened which means these households spend more than 50% of their income on housing costs. Elderly households have a higher rate of being cost burdened or severely cost burdened. Additionally, renters in small households have higher rates of being cost burdened or severely cost burdened. Both owner-occupied and renter-occupied households

at 0-30% of the area median income had the largest number of severely cost burdened households. The Con Plan says that racial ethnic groups like Asians, Hispanics and Blacks are disproportionately impacted by the cost of housing. The Con Plan identifies a contributing factor to unaffordable housing costs as being a decline in income. Another contributing factor is the substandard housing that is uninhabitable for occupancy by residents in need of quality and affordable housing. Based upon a recent article in the Rocky Mount Telegram, nearly 55% of the homes in Rocky Mount were constructed before 1970 and slightly more than 14% of the housing has been built since 2000.¹ More renters are dealing with substandard housing as compared to homeowners. Some issues include lack of complete plumbing or kitchen facilities.

In 2018, the North Carolina Housing Coalition released data that ranked Edgecombe and Nash Counties as having some of the highest eviction filings in the State. This ranking coupled with the current health pandemic has led to increased housing needs and affordability challenges due to economic hardships caused by COVID-19. LANC's eviction diversion team has clients from both Counties who are facing eviction due to an inability to pay their rent. The Community Academy agrees that housing cost is a major challenge. Therefore, the Community Academy recommends that the City prioritize affordable housing so that more residents will access price-appropriate housing as the City continues to grow and develop.

Affordable Housing Bond

Since housing cost is the primary challenge for the City, the affordable housing bond remains a vital tool that our client recommends as a goal to be implemented. Page 113 of the Con Plan states:

“The City of Rocky Mount conducted a cost-benefit analysis since the last Analysis of Impediments to Fair Housing Choice on the following community revitalization strategies: general obligation bond for affordable housing rehabilitation construction, and homeownership assistance....”

Another provision in the 2018 Analysis to Impediments to Fair Housing Choice (AI) directed Rocky Mount to “(b)egin to implement any community revitalization strategies determined to be feasible through the cost-benefit analysis.”

In highlighting comments made by participants at public meetings to gather input and discuss issues and opportunities related to housing and community development needs, the Con Plan includes the following statement:

“The City should implement an affordable housing bond or general obligation bond that can assist with the creation and preservation of affordable housing.”

¹ https://rockymounttelegram.com/news/local/City-weighs-bond-issue-tax-hike-for-affordable-housing-plan/article_5bf533f5-5d37-5d37-5f1c-910a-baaff7d800b7.html

For the above referenced reasons and to address more fully all of the affordable housing needs in Rocky Mount, the Community Academy recommends the City make the following change:

Amend the section of the 2021 AI, titled *Goals and Actions to Address Impediments*, to direct the City to continue research toward implementation of an affordable housing bond.

Targeted Code Enforcement and Demolitions Could Displace Long-Time Residents

The Con Plan states that a priority for the City is to eliminate the slum and blighting influences, but the Con Plan fails to describe how this process will be done. If code enforcement is done without a strategic and coordinated plan, then it could lead to displacement of long-term residents, especially if fines are levied against long-time residents and the City proceeds with enforcing a lien against such the fines. Demolitions of housing need to be carefully planned to minimize the loss of naturally occurring affordable housing and to only occur when housing is not suitable for repair or rehabilitation. Furthermore, if the City commences with targeted code enforcement in the neighborhoods with the highest vacancy and blight, these efforts will have a disproportionate impact on black and brown communities which are primarily located on the Edgecombe County side of Rocky Mount. Residents in black and brown communities subject to targeted code enforcement would be at risk of mass displacement which is inconsistent with the Federal Fair Housing Act's ("Act") goal to eliminate racial housing segregation by creating integrated patterns of living. The Act requires the City to do more than refrain from discriminating against certain protected classes. The Act also requires the City to affirmatively further fair housing which means that the City must take affirmative steps to remove any barriers to housing choice and provide fair housing choice to those groups who face discrimination. Therefore, any code enforcement policy must integrate racial justice equity by considering the historical context of redlining in Rocky Mount.

The Center for Community Progress released a publication entitled "Exploring Equitable, Effective, and Efficient Solutions to Vacancy and Abandonment in Winston-Salem, North Carolina," where it advised the City of Winston-Salem on how to ground equity while creating code enforcement. The publication reads, "the history of land use, housing, and lending policies throughout much of the 20th century across America intentionally or indirectly harmed communities of color. As the City and its partners seek to address vacancy and abandonment and seed disinvested neighborhoods with opportunity and vitality, it should do so with an honest and humble embrace of {its} troubled past and thus commit to centering equity in the important work going forward."² Likewise, the City of Rocky Mount should ground equity in its efforts to address "slum" and "blight," a process often referred to as urban renewal. The current racially segregated communities in Rocky

² https://www.communityprogress.net/filebin/2020_0218_Winston-Salem_TASP_Report_Final.pdf

Mount were created that way by housing discrimination and redlining by the Federal Housing Administration (FHA). The FHA redlined certain communities as being too highrisk for lending because of the presence of having an “undesirable element,” which meantthe presence of black people and other people of color. When public investments under the guise of “urban renewal” are made to neighborhoods that have experienced decades of disinvestment, the investments have resulted in the leveling and bulldozing of black neighborhoods and black business districts in these communities. Therefore, any code enforcement policy should include a full range of hardship provisions to aid vulnerable residents like low wealth and senior households who may be unable to afford the costs of repairs. Before levying fines against vulnerable residents for code enforcement violations,the City should work proactively to provide solutions like grant assistance and payment arrangements if fines were levied.

Additionally, the Con Plan states that any occupants of the properties that will be demolished will be relocated, but the Plan does not provide details on a relocation plan. If relocation of some residents is necessary, then the City should create a detailed relocation plan which aims to relocate necessary occupants to decent, affordable housing within the City. The City should also explore funds to assist occupants to obtain new housing.

Housing Rehabilitation and Repairs

The City should find ways to increase the rehab and repair assistance for long-time residents to ensure the preservation of affordable housing in the surrounding downtown core and in the 14 neighborhoods that have been described as “targeted areas of opportunity.”The City lists a goal to provide decent housing by preserving the affordable housing stock and increasing the availability of affordable housing. One means to accomplish this goal is to allocate sufficient funds towards helping long-time residents, including seniors, rehab and repairtheir homes by avoiding code enforcement violations that could lead to displacement. The HUD funds alone are insufficient to rehab or repair much of the deteriorating or dilapidated housing, so the City must identify other funding sources. The City could contribute funds from its generalfund towards rehab and repair assistance or consider using the proposed housing bond strategyas a funding source to rehab and repair houses.

The City should also change its policy on the Housing Rehab Matching Rebate Program to limit eligibility only to owner-occupied properties. This slight change will prevent investors from using this important program to rehab and flip homes. This practice of flipping homes typically involves investors buying low and selling high which increases housing costs instead of preserving naturally occurring affordable housing occupied by residents.

Perhaps the City could allocate separate funds to incentivize investors to rehab homes or apartment buildings if the investors agree to sell the homes at an affordable price or provide affordable rentals.

We also recommend that there be a coordinated effort between the Community and Business Department and the Community Code Department to identify houses which do not

meet the minimum housing code and encourage more homeowners to apply to one of the City's grant repair programs.

The City's Coordination with Public Housing Authorities

We recommend the City work more closely with the public housing authorities to ensure long-term affordable housing for residents. Likewise, the City of Durham, in its plan entitled "City of Durham Affordable Housing Goals 2016-2021," also saw the need to "develop a closer alignment with the Durham Housing Authority." The Durham plan states: "the City and DHA (Durham Housing Authority) will need to build a different and stronger partnership, founded on common goals and shared execution....Longer term, discussions could focus on how to leverage City and DHA resources to have the greatest impact on Durham's housing needs."

The Con Plan indicates that median rents have increased in Edgecombe and Nash Counties which put pressure on low-income renters. 15.2% of households are cost burdened. Although households with income levels between 0-80% of the area median income (AMI) have a need for affordable housing, households with an income level of 0-30% of the AMI have the greatest need. Further, 1,746 rental units have been identified as affordable for this income level, but these units represent only 8.5% of the rental housing inventory in the City. Yet CHAS data indicates there are 2,345 renter households with incomes below 30% of the AMI. The fair market rent for a two-bedroom house in Rocky Mount is \$721 per month, which requires a person making a living wage of \$15/hour. Therefore, a minimum wage worker or a senior on a fixed income will not be able to afford a two-bedroom apartment without a subsidy. There is a real lack of housing for those at and below 30% of the AMI, and the City should collaborate with the public housing authorities to provide more housing for those households with the greatest need.

The City should further coordinate with the public housing authorities to prevent displacement of long-term residents with incomes below 30% of the AMI. Sometimes, public housing conversions to other types of housing can lead to displacement of long-term, low-income residents. When a housing authority demolishes its current public housing to convert to mixed-income units, the original residents are not usually provided an automatic right to return, and they may have to complete a new rental application. When public housing units are converted to Low Income Housing Tax Credit (LIHTC) housing, residents must complete a new application which requires a new screening process, including credit and criminal background screenings. The City should work with the public housing authorities to ensure that current and new residents in need of subsidized housing will have the opportunity for housing within the City.

The Con Plan mentions the term "targeted code enforcement" multiple times as one of the community revitalization strategies in the cost-benefit analysis; however, the term should be changed to "equitable code enforcement" to match with the same term previously used in the City's 2018-2021 Con Plan and AAPs.

The Draft 2021 Annual Action Plan

Our client supports the City's goal to use a majority of funds for rehabilitation of existing rental and multi-family housing in center-city neighborhoods identified as Target Areas of Opportunity (TAOs); however, our client group acknowledges that the 2021 HUD funds are limited and do not meet the rehabilitation needs in the City. Therefore, other funding options such as a housing bond need to be implemented. Our client also supports the City's proposed projects for 2022-2023, especially the Atlantic-Arlington Redevelopment Project which the client group helped develop.

The Draft Analysis of Impediments to Fair Housing

Goal 1, Action 7 of the AI also directs the City to complete the cost-benefit analysis of the community revitalization strategies; however, as stated above, our understanding is that this action has been completed. Additionally, the AI lists one of the community revitalization strategies as "targeted code enforcement," again the term should be changed to "equitable code enforcement" to match with the same term previously used in the City's 2018-2021 Con Plan and AAPs.

Goal 1, Action 10 of the AI instructs the City to work with planning staff to focus demolition efforts in a specific, targeted manner as ordered by City Council. As previously discussed above, our client recommends that the City incorporate equity considerations when using a code enforcement policy which includes demolition.

Furthermore, the City Council passed a Resolution dated February 25, 2019 which created the Workforce Housing Advisory Commission (WHAC) to support fair and affordable housing in Rocky Mount. Therefore, the City should add an action step under Goal 3 of the AI for the Human Relations and Community Development to coordinate with the WHAC to promote fair and affordable housing.

We appreciate the opportunity to provide these comments to the City of Rocky Mount, and we look forward to continuing our partnership with the City to support equitable community development for all residents.

Sincerely,

Yolanda L. Taylor

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Yolanda L. Taylor, Managing Attorney
Alecia Amoo, Staff Attorney

Robert Davis

The Steering Committee
of the Community Academy
Robert Davis, Chair

cc: Rochelle Small-Toney, City Manager and Peter Varney, Interim Director of Community and Business Development