

Recipient's Plan to Further Fair Housing

Grantee: Town of Carrboro

Grant No: 20-V-3525

Recipient's Address: 301 West Main Street
Carrboro, NC 27510

Contact Person: Rebecca Buzzard

Contact Phone #: 919-918-7438

Contact Email: rbuzzard@townofcarrboro.org

TDD #: 800-826-7653

I. Indicate if the Recipient will be affirmatively furthering fair housing for the first time or has implemented specific activities in the past.

First Time X

Past Activities

II. Identify and analyze obstacles to affirmatively furthering fair housing in recipient's community. (Use additional pages as necessary)

In 2020, Orange County worked with the Center for Urban and Regional Studies at the University of North Carolina Chapel Hill to conduct an Analysis of Impediments to Fair Housing Choice (AI). The AI includes an analysis of Orange County laws, regulations, and administrative policies, procedures, and practices that affect the location, availability, and accessibility of housing throughout the County, which includes the Town of Carrboro. The AI also includes an assessment of conditions, both public and private, that affect fair housing choice.

The AI identified the following impediments to fair housing, which apply to Carrboro:

- **A lack of affordable housing has resulted in severe rent burdens among many renters, especially those with low and moderate incomes.** A majority of renters in the county are rent burdened—spending over 30% of household income toward rent and utilities; this figure exceeds 85% for households earning below \$35,000 and is still over half for households earning \$35,000–\$49,999. Meanwhile, over 80% of households earning under \$20,000 are severely rent burdened (meaning they pay over half their income toward rent and utilities), as are nearly 40% of households earning \$20,000–\$34,999.
- **African Americans and Hispanics face difficulties receiving conventional mortgage loans.** The denial rate for first-lien, conventional mortgages for African Americans is consistently over four times that of Whites, and the denial rate for Hispanics is between two and four times that of Whites as well. The most common reasons for denial, as noted in the HMDA data, are credit history for African Americans (33% of all denial reasons) and debt-to-income ratio for Hispanics (49% of all denial reasons).

- **Based on the number of fair housing complaints filed, disabled persons face difficulties accessing fair housing.** Nearly half of all fair housing complaints filed in the 2010–2018 period were filed due to discrimination based on disability. Given that the county’s population with a disability is approximately 12,500, and that over a quarter of the elderly are also disabled, this is a significant barrier to fair housing.
- **Zoning throughout Orange County largely restricts the development of denser, more affordable housing.** Only a handful of areas in Orange County are zoned for moderately dense residential development (over four lots or units per acre), and resident opposition can complicate or inhibit the development of denser housing in those areas. Given the high cost of land in service-rich neighborhoods of Carrboro and Chapel Hill, low-density zoning can prevent the construction of affordable housing.

Based on the impediments above, the AI makes the following recommendations. :

- Seek more funds for subsidized housing. Low- and moderate-income households are disproportionately rent-burdened, and recently, rents have increased faster than wages.
- Educate landlords, property managers, and other housing providers about fair housing law and reasonable accommodation, especially as they pertain to persons with disabilities.
- Offer educational courses on mortgage lending and building credit scores that are geared toward African American and Hispanic borrowers.
- Encourage cooperation and coordination between the affordable housing advisory boards in the county.
- Explore funding options for a best-practices Rapid Rehousing program to serve homeless individuals and families in Orange County.
- Identify ways to protect residents of mobile home parks who may be under threat of displacement.
- Consider areas to strategically up-zone to promote the development of affordable housing.

III. Will the above activities apply to the total municipality or county?

Yes X No If no, provide an explanation.

IV. Briefly describe the quarterly activities that the recipient will undertake over the active period of the grant to affirmatively further fair housing in their community. A time schedule and estimated cost for implementation of these activities must be included. *Activities must be scheduled for implementation at least on a quarterly basis.*

Grantee Name: Town of Carrboro – All activities being undertaken by the County include implementation within the Town limits.

Quarterly Fair Housing Activity	Months	Year	Estimated Cost	Actual Cost
Seek more funds for subsidized housing. Orange County Housing and Community Development Department, and its partners in the Towns of Carrboro, Chapel Hill, and Hillsborough are constantly seeking funding opportunities for affordable housing in the community, and will continue to do so ongoing throughout the CDBG-CV grant period. Examples of recent funding secured for affordable housing – in addition to this CDBG-CV grant – include Coronavirus Relief Funds (CRF) allocated to the County and Town of Carrboro, CRF funds from the NC Department of Health and Human Services, and Emergency Solutions Grant (ESG) funds from the NC Department of Health and Human Services.	Jan-Mar	2021	\$0	
	Apr-Jun	2021	\$0	
	Jul-Sep	2021	\$0	
	Oct-Dec	2021	\$0	
	Jan-Mar	2022	\$0	
	Apr-Jun	2022	\$0	
	Jul-Sep	2022	\$0	
	Oct-Dec	2022	\$0	
	Jan-Mar	2023	\$0	
	Apr-Jun	2023	\$0	
Explore funding options for a best-practices Rapid Rehousing program to serve homeless individuals and families in Orange County. Orange County Housing and Community Development Department and the Orange County Partnership to End Homelessness set up and funded a best-practice Rapid Rehousing program in 2020, using ESG funds, ESG – Coronavirus (ESG-CV) funds, and HOME Investment Partnerships Program (HOME) funds. They estimate that at full capacity – with two full-time case managers with full caseloads – the annual budget requirement will be \$432,000.	Jan-Mar	2021	\$108,000	
	Apr-Jun	2021	\$108,000	
	Jul-Sep	2021	\$108,000	
	Oct-Dec	2021	\$108,000	
	Jan-Mar	2022	\$108,000	
	Apr-Jun	2022	\$108,000	
	Jul-Sep	2022	\$108,000	

	Oct-Dec	2022	\$108,000	
	Jan-Mar	2023	\$108,000	
	Apr-Jun	2023	\$108,000	
<p>Identify ways to protect residents of mobile home parks who may be under threat of displacement.</p> <p>Orange County Housing and Community Development Department is working with the Towns of Chapel Hill, Carrboro, and Hillsborough to align mobile home park displacement prevention and relocation strategies.</p> <p>The County currently has funds for mobile home park infrastructure upgrades (about \$1 million) and a small amount of funds for mobile home replacement and relocation when a resident faces displacement. The County and the Towns plan to create a joint plan to ensure how a rapid response when opportunities to prevent displacement of mobile home park residents and/or assist with relocation arise, and propose broadening the allowable uses of existing funds to provide the flexibility needed to respond to mobile home needs as they arise.</p> <p>Once the joint plan is developed, we estimate an annual budget of at least \$500,000 will help fund expenses related to park upgrades, relocation, etc.</p>	Jan-Mar	2021	\$125,000	
	Apr-Jun	2021	\$125,000	
	Jul-Sep	2021	\$125,000	
	Oct-Dec	2021	\$125,000	
	Jan-Mar	2022	\$125,000	
	Apr-Jun	2022	\$125,000	
	Jul-Sep	2022	\$125,000	
	Oct-Dec	2022	\$125,000	
	Jan-Mar	2023	\$125,000	
	Apr-Jun	2023	\$125,000	

V. Describe recipient’s method of receiving and resolving housing discrimination complaints. This may be either a procedure currently being implemented or one to be implemented under this CDBG grant. Include a description of how the recipient informs the public about the complaint procedures.

All Carrboro residents are directed to the Orange County Department of Human Rights and Relations, which follows the Orange County Civil Rights Ordinance:

<http://orangecountync.gov/DocumentCenter/View/2673/Orange-County-Civil-Rights-Ordinance-PDF>

- a) Any person or persons wishing to file a complaint of housing discrimination in Orange County may do so by submitting the complaint to the Orange County Human Relations Commission.
- b) Complaints shall be in writing, signed and verified by the Complainant. Complaints shall state the facts upon which the allegation of an unlawful discriminatory practice is based and shall contain such other information and be in such form as the Commission requires.
- c) Commission staff shall assist Complainants, if necessary, in reducing Complaints to writing and shall assist in setting forth the information in the Complaint as may be required by the Commission.
 - 1) The Complaint must be filed with the Commission no later than one (1) year from the date of the occurrence, or cessation of the alleged unlawful practice.
- d) The Commission staff shall serve upon the Respondent and Complainant, in accordance with the North Carolina Rules of Civil Procedure, a copy of the Complaint and a notice advising the Respondent and Complainant of his or her procedural rights and obligations under this Ordinance within ten (10) days after the Complaint is filed with the Commission.
- e) A Respondent may file an answer to the Complaint within ten (10) days after receiving a copy of the Complaint. Answers shall be signed and verified by the Respondent and shall be filed with the Commission.
- f) With leave of the Commission staff, which leave shall be granted whenever it would be reasonable and fair to do so, Complaints and Answers may be amended at any time. Amendments shall be reduced to writing, signed, verified, and filed with the Commission. Amendments shall relate back to the date the original Complaint or Answer was filed.
- g) The Commission staff shall, within thirty (30) days after the filing of a Complaint, commence an investigation into the allegations contained in the Complaint.

- h) In conducting an investigation, the Commission staff shall have access at all reasonable times to premises, records, documents, individuals, and other evidence or possible sources of evidence to ascertain the factual basis of the allegations contained in the Complaint. Further, the Commission staff may examine, record, and copy such materials and take and record the testimony or statements of such persons as reasonably necessary for the furtherance of the investigation.
- i) In conducting an investigation, the Commission staff may, in accordance with the North Carolina Rules of Civil Procedure:
 - 1) issue subpoenas compelling access to or production of documents, materials, or other evidence;
 - 2) issue subpoenas compelling witnesses, including any party, to appear and give testimony before the Commission staff;
 - 3) issue subpoenas compelling witnesses, including any party, to appear and give testimony at a deposition;
 - 4) take depositions of witnesses, including any party; and
 - 5) issue interrogatories to a Respondent.
- j) Upon written application to the Commission staff, a Respondent shall be entitled to the issuance of interrogatories directed to the Complainant, to the issuance of a reasonable number of subpoenas for the taking of depositions, and to the issuance of a reasonable number of subpoenas for the production of evidence.
- k) In the case of refusal to obey a subpoena, answer an interrogatory, answer a question propounded in a deposition, or answer a question propounded during an interview conducted by the Commission staff pursuant to this section, the Commission staff or the Respondent may make a motion in the Superior Court to compel a person to obey the subpoena, answer the interrogatory, or answer the question. The North Carolina Rules of Civil Procedure shall apply to the making of such motions. If a person fails to obey an order issued pursuant to this subsection, the court may apply any or all of the sanctions available in Rule 37 of the North Carolina Rules of Civil Procedure.
- l) Whenever the Commission staff concludes on the basis of a preliminary investigation of a Complaint that prompt judicial action is necessary to carry out the purposes of this Ordinance, the Commission may commence a civil action in the Superior Court for injunctive relief pending final disposition of the Complaint. Any injunctive relief shall be ordered in accordance with Rule 65 of the North Carolina Rules of Civil Procedure. The commencement of a civil action to obtain injunctive relief shall not affect the continuation of the Commission staff's investigation or the initiation of a separate civil action provided for in this Ordinance.
- m) Complaints may be resolved at any time by informal conference, conciliation, or persuasion. Nothing said or done in the course of such informal procedure may be

made public by the Commission or used as evidence in any subsequent proceeding without the written consent of the person concerned. However, all resolutions of complaints shall be reduced to writing, shall be signed by the Complainant, the Respondent, and by the Commission staff and shall be enforceable as a binding contract by the Commission pursuant to the applicable provisions of North Carolina law, statutory and common.

Approved By:

Name and Title of Chief Elected or Executive Officer	Signature	Date
---	------------------	-------------