

City of Hendersonville (NC)
Affirmatively Furthering Fair Housing
(AFFH) Plan
Analysis of Impediments to Fair Housing
Choice – AI

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Introduction and 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 require 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, states and other HUD grantees still are required to ensure that they are not contributing to patterns of discrimination within their jurisdictions. For this reason, the North Carolina Department of Commerce (DOC), the agency charged with the administration and management of the state’s Community Development Block Grant (CDBG) funding, 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.

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).

Who Conducted the AI

The Land of Sky Regional Council (LOSRC) conducted the AI on behalf of the City of Hendersonville.

Participants

The AI has been presented and discussed with the city's Homeless Resource Team, the Planning Board, and City Council. The Homeless Resource Team members include representatives from city administration, the fire department, health care, social services and housing organizations.

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 and municipal level,
- 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,
- 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 North Carolina Human Relations Commission, and,
- Interviews and stakeholder meetings conducted with 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 by the City of Hendersonville.

Executive Summary

The following provide an overview of key findings and information, which are presented in more detail in later sections.

Socio-Economic Background Data and Analysis

- The City of Hendersonville has only 13 percent of Henderson County's population (15,137 City residents out of 122,907 total County residents), but the City has six times the population density of that of the County.
- The City of Hendersonville has a proportionally larger White population (86%) and Black or African-American population (8%) than Henderson County as a whole (77% White, 3% Black or African-American). Henderson County has a larger Hispanic population (12%) than

Hendersonville (7%).

- Census Tracts 9311, 9312, and 9313 show consistent overlap for both Low-Income and People of Color populations (see figures 4 & 5).
- Both the City of Hendersonville and Henderson County as whole have housing supply shortages, with 0.55 housing units available for an average household size of 1.84 persons in the City and 0.46 housing units available for an average household size of 2.31 persons in the County.

Analysis to Determine Disproportionate Housing Needs

- In Henderson County, 46.8% of renter-occupied households are cost burdened (i.e. spending great than 30% of their income on housing) compared to 8% of owner-occupied households in the County.
- In Henderson County, 28.9% of renter-occupied households are in pre-1970 housing, which assumes the presence of lead paint. For owner-occupied households, this figure is lower at 18.6%, assuming a greater prevalence of newer than 1970 housing for owner-occupied households.
- Looking at Henderson County as a whole, People of Color (with the exception of Asians) are more likely to be renters than owners.
- For persons that are blind or disabled (estimate population of 1,579), Henderson County has a large Persons-In-Need to Available Housing ratio, with only one unit per 58 people (assuming a 1-person Household) or only one unit per 29 people (assuming a 2-person Household).
- Henderson County's ratio of persons unable to obtain needed mental health services in the past year (9.8%) is slightly lower than the 4-county regional average (10.28%). Still, Henderson County's rate is more than double Madison County's rate (4.0%) of and almost the rate of Transylvania County (11.60%), yet these two counties have significantly smaller overall populations than Henderson County.
- Henderson County's Frail and Elderly population will be somewhere between 3,000 and 3,500 people by 2025, assuming a national average 10% of the population of those over the age of 65, have at least three of five characteristics: shrinking/weight loss, physical exhaustion, muscle weakness, decline in walking speed, and low physical activity.

Unlike the larger 18-County WNC Region, Henderson County's household growth for Households Ages 65+ outpaced population growth from 2010-2020. If this trend continues, Henderson County will need flexibility for housing types that can serve smaller household sizes and those with special needs cited above under the definition of "Frail and Elderly" populations. Universal Design is a common design approach for these and other disability considerations. In a recent survey scan of Henderson County, only 592 housing units designed for Seniors 55+ existed. <https://www.wbdg.org/design-objectives/accessible/beyond-accessibility-universal-design>

Analysis to Determine the Nature and Extent of Discrimination

- Census Tracts 9311 and 9312 within the City of Hendersonville have significantly higher Black or African-American populations than the city as a whole (see figure 21). Census Tract 9313 is partially within the City of Hendersonville's city limits (i.e. the Barker Height area is in Unincorporated Henderson County, per figure 22) and has a significantly higher Hispanic or Latino population than the city as whole. Additionally, all three Census Tracts for these populations are contiguous to one another.
- The City of Hendersonville, like much of the rest of North Carolina, practiced de facto (societally-practiced) and de jure (government-sanctioned) racial segregation until the mid-1960s, with separate community facilities such as schools and public housing for whites and African-Americans. This report's authors found two specific addresses in historic records subject to segregation:
 - **825 N. Whitted St.** (currently, Hendersonville Middle School; historically, this was the "Ninth Avenue School", a segregated school for African-Americans from 1951-1965, located within the current Census Tract 9311, which has an African-American population of 16.6% compared to the overall City's 8% African-American population).
 - **710 1st Ave. W.** (currently, a private residence; historically, this was the Landina Guest House, a boarding house for African-American travelers listed in the 1960-1961 "Negro Motorist Green Book", a published guide for African-Americans seeking safe and guaranteed accommodations that was published from 1932 until 1967.) The home is located in Census Tract 9312 (12.2% African-American compared to the larger City's 8% African-American population), which is contiguous to Census Tract 9311 where the "Ninth Avenue School" was located.
- The Census Block Groups highlighted in Figure 25 generally correspond with Census Tracts that have minority population concentrations (Census Tract 9311 and 9312 for Black or African-American; Census Tract 9313 for Hispanic or Latino).
- The City of Hendersonville Housing Authority has two developments that it manages, Henderson Heights and RTS South. These properties consist of 375 units ranging from 0BR to 5BR apartments for low, very low, and moderate income families. Apartments are scattered throughout the City of Hendersonville with 2 elderly-disabled communities in surrounding Henderson County.

Figure 29 highlights the location of several units of public housing and other government-subsidized housing within Census Tracts 9311, 9312, and 9313, all identified as having higher concentrations of minority populations.

- Between 2016 and 2021, only one formal discrimination complaint was filed with the NCHRC within the City of Hendersonville, however the case was dismissed due to lack of cooperation on behalf of the complainant.
- Fair Housing complaints are tracked across North Carolina through the "The Fair Housing Project" (NC Legal Aid).

State average: 37.93 complaints/100,000

Henderson County: 39 complaints / 100,000

- Rates of homeownership vs. rentership by race in Census Tracts 9310, 9311, 9312, and 9313 (noted in other figures in this report) are generally lower for People of Color than for Whites.
- Mortgage denial rates in 2020 by race/ethnicity, non-Whites in Henderson County may be anywhere from 1.5 to 3 times as likely to be denied a mortgage than Whites.
- Mortgage denial rates by sex, males (14.32%) have a higher, but not significantly higher denial rate (variable by 10%) than females (12.54%) or joint applicants (couples, 9.13%).
- Mortgage denial rates by age, applicants under 25 (17.39% denial rate) are about 1.7 times more likely to be denied for a mortgage than applicants aged 65-74 (10.48% denial rate).
- Local financial institutions in Hendersonville have supported the development of affordable housing including Hometrust Bank, United Community Bank and First Citizens Banks.
- The number of Low-Income Housing Tax Credit (LIHTC) and government-subsidized housing units built in the last 20 year is estimated to be 388 housing units.
- Projects are typically in compliance with FFHA requirements and ADA/Section 504 requirements. For example, the City of Hendersonville converted Grey Mill, a hosiery mill built in 1918, which ceased operations in 1967, into a 35-unit apartment building with fully-accessible units.
- Typically, in healthy and well-balanced housing markets, availability rates are between 2.0% and 3.0%, though due to recent national housing market pressures it is not uncommon for most markets to have an availability rate below 2.0%. As such, the overall region's available for-sale housing supply is extremely low. Out of an 18-county WNC region, only Burke County (0.3%) and McDowell County (0.4%) have lower rates of housing availability than Henderson County (0.6%).

While housing availability isn't an overt form discrimination in the Building and Construction Industry, housing availability can have secondary discrimination effects such as builders only building higher-end housing given limited and more expensive land, therefor effectively excluding low-income buyers and renters from the larger real estate market.

- A low-income area immediately southeast of downtown Hendersonville (CT 9313) lacks sewer infrastructure, as shown by roughly the same general area highlighted by the dashed line in Figure 45. Census Tract 9313 is both low-income and 30% Hispanic or Latino.
- The U.S. Environmental Protection Agency (EPA) and North Carolina Department of Environmental Quality (NCDEQ) maintain mapped in inventories of hazardous materials sites and these have overlap with Low-Income and Minority-Concentrated Area (see figures 49 and 50).

Examination of Public Policy and Programs

Federal & State Program Eligibility

Difficult Development Areas (DDAs) – Areas with high land, construction and utility costs relative to the area median income and are based on Fair Market Rents, income limits, the 2010 census counts, and Five-Year American Community Survey (ACS) data are considered Difficult Development Areas. They are important to LIHTC projects because they allow such projects to have higher construction costs than are normally allowable. Census Tract 9312 (downtown Hendersonville) contains higher than County-average minority and poverty-level populations, creating conditions that may support a Low-Income Housing Tax Credit (LIHTC) project at some point in the future.

Zoning Requirements That Have the Effect of Limiting the Availability of Rental Units

Dimensional requirements (i.e. min. lot size, min. lot width at building line) and use restrictions that are challenges to housing supply and housing affordability are summarized here and in figures 56-59:

- **Supplementary Standards (SS) for Accessory Dwelling Units (ADUs):**
 - a) Accessory dwelling units may only be situated on a lot on which a principal residential dwelling unit is also situated and shall be clearly incidental or accessory to such principal residential structure.
 - b) No more than one accessory dwelling unit may be situated on any lot.
(NOTE: “Performance zoning” options could allow for more than one ADU per lot, indexed to larger lot size.)
 - c) Accessory dwelling units may not exceed 800 square feet of floor area.
(NOTE: 800 SF is equal to two (2) bedrooms. If the size limit was closer to 1,200 SF, this could allow 3-bedroom ADUs suitable for families or intergenerational households on one lot.)
- **Duplexes and Multi-Family require a larger min. lot size than Single-Family Detached Houses:**
This requirement potentially raises the per unit cost of housing rather than allowing more efficient use of minimum lot size. See figures 56-59.
- **Multi-Family Attached Housing is not permitted in any of the residential-only districts.** This includes the R-6 High Density Residential district.
- **Manufactured Homes are not permitted in any by-right zoning district.** They are only allowed via PMH Planned Manufactured Housing Development Conditional Zoning District Classification, mapped on one 5.25 AC site out of 7.309 sq. mi. (4,678 AC), or 0.112% of city land area

Impediments to Fair Housing Choice

See the Summary of Impediments for more detail and a list of recommendations.

1. Inadequate housing supply, both for-sale and rental
2. Inadequate supply of accessible housing options
3. Lack of housing finance options to achieve homeownership
4. Discrimination based on source of rental income and previous eviction
5. Lack of transportation
6. Lack of awareness of fair housing laws

Socio-Economic Background Data and Analysis

Population Profile

The City of Hendersonville has 13% of the County population and its population density is six times that of Henderson County's population density.

	City of Hendersonville	Henderson County
Total Population	15,137	122,907
Percent of Total County	12%	n/a
Density/Sq. Mi.	2,074	330

Figure 1: City of Hendersonville and Henderson County Population Comparison

Source: City of Hendersonville, 2016 - 2020 ACS 5-Year Data Profile; Henderson County, 2021 18-County Bowen Report

Racial and Ethnic Profile

The City of Hendersonville has a proportionally larger non-White population than Henderson County.

	City of Hendersonville	Henderson County
Total Population	15,137	122,907
White Alone	13,018	94,914
Percent White	86%	77%
Black or African American Alone	1,211	3,224
Percent African American	8%	3%
Asian Alone	182	1,022
Percent Asian	1%	1%
Some Other Race Alone	1,665	5,561
Percent Some Other Race Alone	11%	5%
Two or More Races	303	2,019
Percent Two or More Races	2%	2%

Figure 2: City of Hendersonville and Henderson County Population by Race Comparison

Source: City of Hendersonville, 2016 - 2020 ACS 5-Year Data Profile; Henderson County, 2021 WNC 18-County Bowen Report

Racial and Ethnic Concentrated Areas of Poverty

Census Tracts 9311, 9312, and 9313 within the City of Hendersonville generally show an overlap for Racial and Ethnic Concentrated Areas of Poverty as show in the following maps.

	Population by Poverty Status			Income at or below poverty level			Total Population	Overall Population by Poverty Status	
	<18	18 to 64	65+	<18	18 to 64	65+		Number	Percent
City of Hendersonville	1,124	1,064	391	6,736	2,255	1,468	15,137	2,861	18.90%
Henderson County	3,850	6,711	11,847	17,872	56,656	26,527	122,907	12,408	10.1%

Figure 3: Poverty Figures for City of Hendersonville and Henderson County

Source: City of Hendersonville, S1701, Poverty Status in Last 12 Months, 2020: ACS 5-Year Estimates Subject Tables; Henderson County, 2021 WNC 18-County Bowen Report

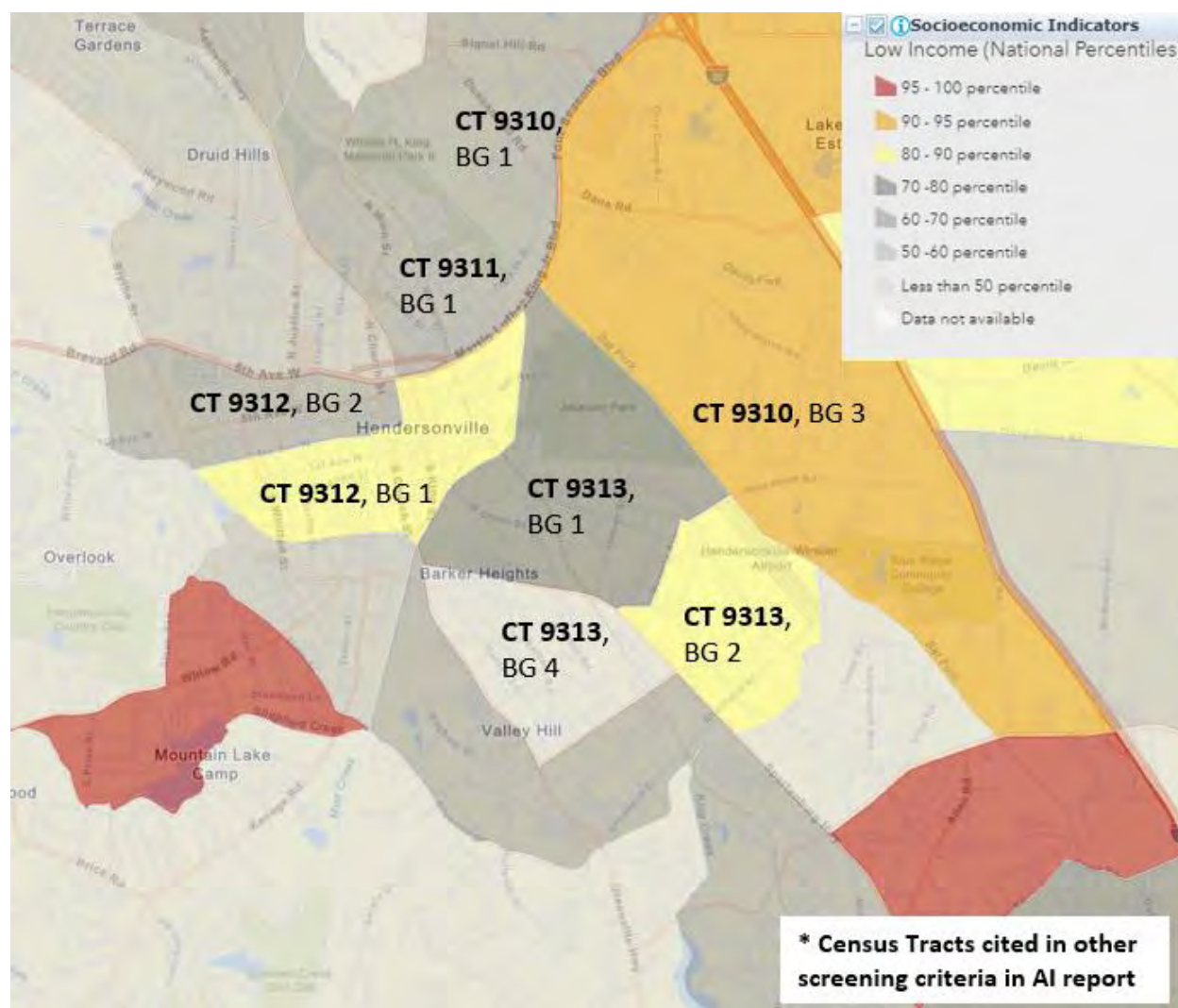


Figure 4: Low-Income Areas by Block Group

Source: <https://ejsscreen.epa.gov/mapper/>, 2015-2019 ACS

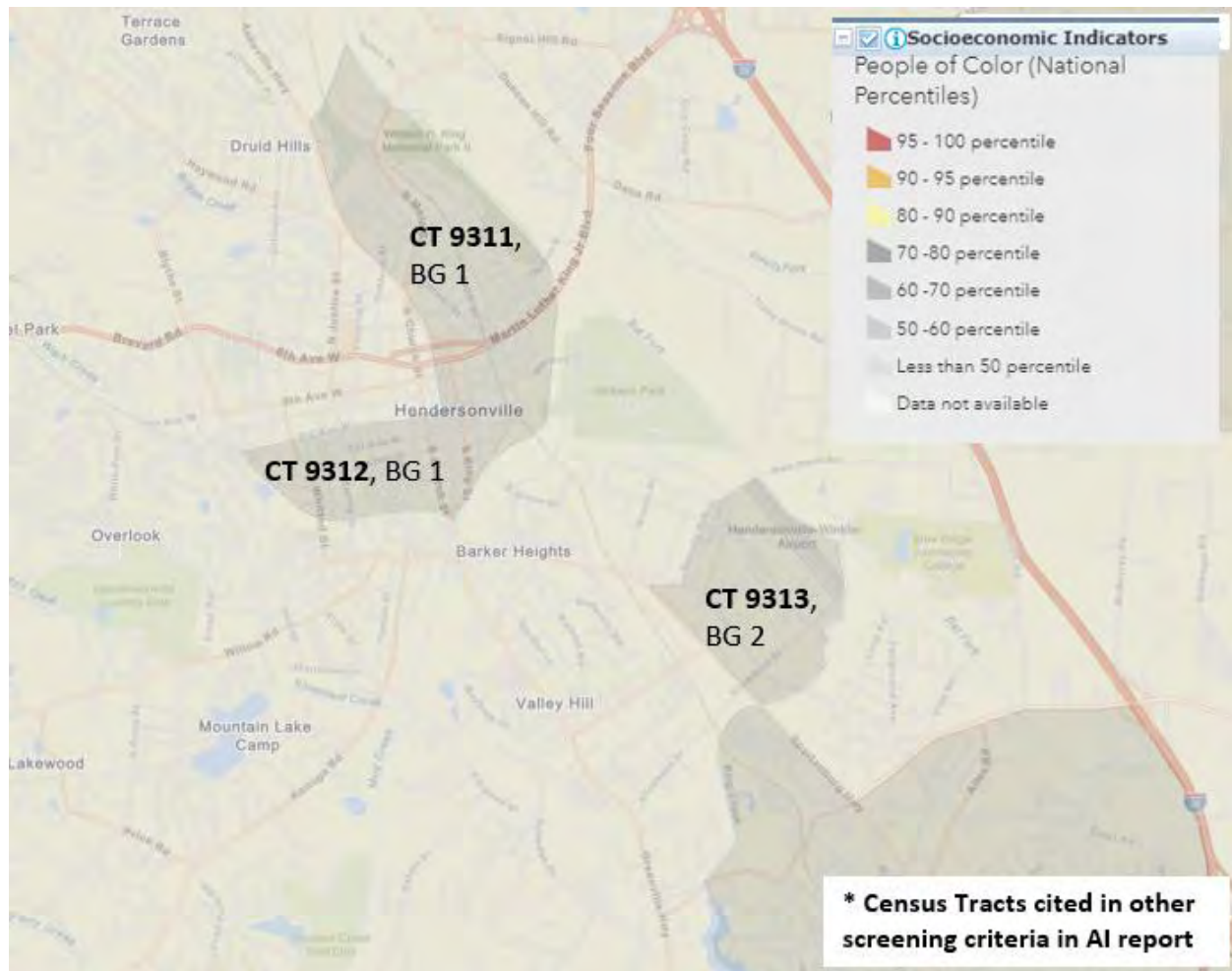


Figure 5: Relative Concentrations of People of Color by Block Group
Source: <https://ejsscreen.epa.gov/mapper/>, 2015-2019 ACS

Age Profile

The City of Hendersonville's population skews slightly older than Henderson County as whole, with the City having a higher median age of 51.2 and a higher percentage of people 65 Years and Older.

	City of Hendersonville	Henderson County
Total Population	15,137	122,907
Under 18 Years	2,679	22,984
Percent Under 18	17.7%	18.7%
18-64 Years	7,886	67,476
Percent 18-64 Years	52.1%	54.9%
65 Years and Older	4,571	32,447
Percent 65 Years and Older	30.2%	26.4%
Median Age	51.2	47.6

Figure 6: Age Profile for City of Hendersonville and Henderson County
Source: City of Hendersonville and Henderson County, S0101, Age and Sex, 2020: ACS 5-Year Estimates Subject Tables

Household and Family Profile

The City of Hendersonville has a higher rate (8.0%) of Single-Female Parent Households than Henderson County as whole (6.7%). The average family size is near equal between the City and County, but the City has a smaller average household size (1.84 persons per HH) than the County (2.31 persons per HH).

	City of Hendersonville	Henderson County
Households	7,274	49,221
Family Households	2,284	25,991
Families with Children	528	7,503
Percent Families with Children	23.1%	28.9%
Single-Female Parent Families	582	1,748
Percent Single-Female Parent Families	8.0%	6.7%
Average Family Size	2.71	2.83
Average Household Size	1.84	2.31

Figure 7: Household Profile for City of Hendersonville and Henderson County

Source: City of Hendersonville and Henderson County, DP02, Selected Social Characteristics in the United States, 2019: ACS 5-Year Estimates Subject Tables (2020 data did not have Families with Children data)

Income Data

As a whole, the City of Hendersonville has less wealth, and greater poverty, than Henderson County as a whole.

	City of Hendersonville	Henderson County
Median Family Income	\$65,577	\$71,966
Median Household Income	\$41,185	\$58,928
Per Capita Income	\$29,647	\$32,306
Poverty Rate	18.9%	11.0%

Figure 8: Income Data for City of Hendersonville and Henderson County

Source: City of Hendersonville and Henderson County, B19113 MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS), ACS 2016-2020

Housing Profile

The City of Hendersonville has slightly lower overall housing vacancy rate (10.7%) than Henderson County as a whole (12.6%), while both the City and County show a housing supply shortage in terms of Housing Units per Capita (i.e. 0.55 housing units available for an Average Household Size of 1.84 persons in City; 0.46 housing units available for an Average Household Size of 2.31 persons in the County).

	City of Hendersonville	Henderson County
Total Housing Units	8,371	56,434
Regional Housing Share	3.9%	26.2%
Occupied Housing Units	7,472	49,317
Percent Occupied	89.3%	87.4%
Vacant Housing Units	899	7,117
Percent Vacant	10.7%	12.6%
Housing Density / Sq. Mi.	1,147	151
Housing Units per Capita	0.55	0.46

Figure 9: Housing Profile for City of Hendersonville and Henderson County

Source: City of Hendersonville and Henderson County, H1, Occupancy Status, DEC Redistricting Data (PL 94-171)

The Bowen HNA showed much lower vacancy rates across the entire county depending on housing type. In a survey of 35 multi-family rental housing projects, only market rate had any available units.

Surveyed Multifamily Rental Housing Henderson County				
Project Type	Projects Surveyed	Total Units	Vacant Units	Occupancy Rate
Market-rate	18	1,101	44	96.0%
Tax Credit	8	333	0	100.0%
Tax Credit/Government-Subsidized	1	36	0	100.0%
Government-Subsidized	8	592	0	100.0%
Total	35	2,062	44	97.9%

Figure 10: Comparison of Multi-Family Rental Housing

Source: 2020 Asheville, NC Region housing Needs Assessment, Bowen National Research

The supply of for-sale housing priced below \$100,000 makes up only 0.6% of the market share, while housing between \$100-\$200k is only 7.9% of the market. The greatest market share is for housing over \$500k (34.4%).

	Available Owner For-Sale Housing by Price Point					
	Henderson County			Region		
List Price	Median Price	Units	Share	Median Price	Units	Share
<\$100,000	\$72,500	4	0.6%	\$86,750	28	1.0%
\$100,000 - \$199,999	\$165,000	54	7.9%	\$169,000	202	7.3%
\$200,000 - \$299,999	\$259,900	134	19.5%	\$259,000	531	19.3%
\$300,000 - \$399,999	\$349,000	145	21.1%	\$350,000	563	20.5%
\$400,000 - \$499,999	\$450,000	113	16.5%	\$450,000	427	15.5%
\$500,000+	\$699,000	236	34.4%	\$777,500	1,000	36.4%

Figure 11: Available For-Sale Housing

Source: 2020 Asheville, NC Region housing Needs Assessment, Bowen National Research

Persons with Disabilities

The City of Hendersonville shows higher percentages of people with disabilities across most ages compared to Henderson County as a whole.

	City of Hendersonville	Henderson County
Total Population	17.0%	14.8%
Age Under 5 Years	0.0%	1.0%
Age 5-17 Years	7.5%	5.9%
Age 18-64 Years	21.1%	19.5%
Age 65 Years and Over	65.7%	63.9%

Figure 12: Percentage of Age Cohorts with Disabilities, City of Hendersonville Compared with Henderson County

Source: City of Hendersonville and Henderson County, S1810, Disability Characteristics; Henderson County, 2021 WNC 18-County Bowen Report

Analysis to Determine Disproportionate Housing Needs

This section mirrors the format used in the *2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium*, November 2020 (herein referred to as “Bowen Report 2020”).

Updated information, where available, is included and noted from *Housing Needs Assessment, Western North Carolina 2021*, by Bowen National Research (aka 18-County Bowen Report; hererin referred to as “Bowen Report 2021”).

Housing Problems (Households with One of the Listed Needs)

While the Asheville Regional Housing Needs Assessment did not evaluate the combination of housing problems and various demographics, it did evaluate the number of households by tenure experiencing one or more of the following housing problems: lacking complete indoor plumbing or kitchen facilities, overcrowded households, severe overcrowded households, cost burdened households, and severe cost burdened households. The table below highlights these issues within Henderson County.

Housing Issues by Tenure, Henderson County, 2020				
Housing Issue	Renter-Occupied		Owner-Occupied	
	Number	Percent	Number	Percent
Incomplete Plumbing (bathroom) or Kitchen	138	1.0%	224	0.6%
Overcrowded (1.01+ persons per room)	502	3.8%	659	1.8%
Cost Burdened (>30% of income spent on housing)	6,196	46.8%	6,784	19.6%
Severe Cost Burdened (>50% of income spent on housing)	2,472	18.7%	2,754	8.0%
Pre-1970 Product (assumes presence of lead paint)	3,795	28.9%	6,713	18.6%

Figure 13: Housing Issues by Tenure, Henderson County, 2020.

Source: 2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium, November 2020; Bowen Report 2021.

Looking at Henderson County as a whole, People of Color (with the exception of Asians) are more likely to be renters than owners.

Homeownership Rates

Occupied Housing Units	48,281
MOE	+/- 623
White	Own (76.3%) - Rent (23.7%)
Black	Own (39.4%) - Rent (60.6%)
Hispanic	Own (42.9%) - Rent (57.1%)
Native American	Own (16.8%) - Rent (83.2%)
Asian	Own (68.4%) - Rent (31.6%)

Figure 14: Homeownership Rates for Henderson County

Source: Racial Disparity in the Land of Sky Region (Esri Story Map), Land of Sky Regional Council, Homeownership rates (derived from ACS 2018 5 Year estimates, <https://storymaps.arcgis.com/stories/4378eb31075b4732ab90c28d0cf538cb>)

Populations with Disproportionate Needs

Blind & Disabled Population

In addition to households facing physical housing conditions (i.e. incomplete plumbing, lead paint, etc.) and cost-burdens, another set of households with housing needs is the blind and disabled community, whose housing needs include principles of Universal Design (i.e. low/no-step entries, wider hallways, lower countertops, walk-in showers, etc.).

	Total Disabled Population by SSI Recipient Status, Henderson County
Noninstitutionalized Disabled Population	17,471
Total Blind & Disabled* 2018 SSI Recipients	1,579
Payment	\$899

Source: ACS S1810 2017 5-Year Estimates; 2018, Social Security Office of Retirement & Disability Policy

*Blind & Disabled separated because the blind can earn up to \$2,040 and other disabled only \$1,220 per month, while still qualifying for disability benefits.

Figure 15: Summary of Persons with Disabilities and SSI Average Income, Henderson County

Source: 2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium

A blind and disabled population of 1,579 might not seem like a large population, but considering that Henderson County only has 27 Accessible Housing Units, this poses a large Persons-in-Need to Available-Housing ratio (see Figure 11, below). There is only one unit per 58 people (assuming 1-person HH), or only one unit per 29 people (assuming 2-person HH).

	Total Number of Accessible Units	Total Number, Blind & Disabled Persons	Ratio of People in Need to Units, 1-person HH	Ratio of People in Need to Units, 2-person HH
Henderson County	27	1,579	58	29

Figure 16: Ratios of Blind/Disabled Persons to Accessible Units

Source: 2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium

Victims of Domestic Violence

Victims of domestic violence often need flexible housing options, both in terms of number of bedrooms and housing type (for children, pets, etc.) and in terms of duration of stay (some victim only need short-term housing less than 30 days, while others need a longer stay).

	Domestic Violence Program Statistics 2018-2019		
	Total Persons Receiving Shelter Services (Referred to area shelters)	Total Persons Non-Residential Services	Total Calls Received
Henderson County	239 (74)	2,418	607

Figure 17: Domestic violence program Statistics

Source: 2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium

As of 2016-2019, Mainstay, was identified as a primary resource for domestic violence victims in Henderson County, with a limited capacity compared to the volume of people needing its services. For example, the shelter had only 36 beds, while double that number of persons were referred to area shelters (74 persons). This points to an unmet need for temporary housing options for this and other in-transition populations.

Housing Provider	Total Population Served	Total Beds	Average Length of Stay (Days)
Mainstay (Henderson County)	137	36	81

Source: Mainstay 2016-2017 Annual Report

Figure 18: Housing options available to victims of domestic violence

Source: 2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium

Mental Illness

Henderson County's ratio of persons unable to obtain needed mental health services in the past year (9.8%) is slightly lower than the 4-county regional average (10.28%). Still, Henderson County's rate is more than double Madison County's rate (4.0%) of and almost the rate of Transylvania County (11.60%), yet these two counties have significantly smaller overall populations than Henderson County.

	Persons Served in Area Mental Health Programs	Total Beds in Licensed Mental Health Facilities	Ratio of Persons Unable to Obtain Needed Mental Health Services in Past Year	Average Ratio of Persons Unable to Obtain Needed Mental Health Services in Past Year
Asheville/Buncombe County	7,034	732	16.30%	10.28%
Henderson County	1,916	127	9.20%	
Madison County	869	47	4.00%	
Transylvania County	1,171	115	11.60%	
Overall Total	10,990	1,021	n/a	

Source: North Carolina Office of State Budget and Management (2018); Mental Health Facilities (G.S. 122 C) Licensed by the State of North Carolina (2019); 2018 WNC Healthy Impact Community Survey

Figure 19: Mental health services

Source: 2020-2024 Consolidated Strategic Housing & Community Development Plan, City of Asheville and The Asheville Regional Housing Consortium

Frail Elderly

Studies have shown that approximately 10% of those over the age of 65 have symptoms of physical frailty. According to The Cleveland Clinic, persons exhibiting frailty are defined as having at least three of these five characteristics: shrinking/weight loss, physical exhaustion, muscle weakness, decline in walking speed, and low physical activity.

Unlike the larger 18-County WNC Region, Henderson County's household growth for Households Ages 65+ outpaced population growth from 2010-2020. If this trend continues, Henderson County will need flexibility for housing types that can serve smaller household sizes.

	Year			Year		
	2010 Census	2020 Census	2025 (Projected)	2010 Census	2020 Census	2025 (Projected) *
Population	162,378	219,710	255,615	22,684	30,025	34,932
Population Change		57,332	35,905		7,341	
Percent Change		35.3%	16.3%		32.4%	16.3%
Households	105,428	137,341	157,774	13,856	18,903	21,715
Household Change		31,913	20,403		5,047	
Percent Change		30.3%	14.9%		36.4%	14.9%

*Assumes 18-County WNC Region average population growth of 16.3% and household growth of 14.9%

applied as trendline to Henderson County Population and Households Ages 65+.

Figure 20: Population and household growth for Ages 65+

Source: S0103, Population 65 Years and Over in the United States, 2020: ACS 5-Year Estimates Subject Tables;

Bowen Report 2021, Appendix F

As the overall population of elderly is projected to increase, the number of frail elderly persons that require housing will likely increase as well. In a recent survey scan of the county, only 592 housing units for Seniors 55+ were identified.

Location	Number of Senior Units 55+ (Surveyed Properties)	Number of Senior Units 55+ (Properties Not Surveyed)	Total Number of Senior Units
Henderson County	568	24	592

Source: Bowen National Research

Figure 21: Senior Units for Ages 55+
Source: Bowen Report 2021, Appendix F

Ex-Offender Re-Entry Population

The North Carolina Department of Public Safety estimates that over 20,000 people are released from prison every year in the state. As such, ex-offenders re-entering society often face many challenges associated with housing, job availability and social services. And although three other WNC counties (see below) have similar inmate release percentages, Henderson County has a significantly higher population than these counties and thus an overall greater demand for a limited housing supply.

Housing options for ex-offenders generally consist of agencies and organizations that provide transitional housing for prisoners that are near or at the end of serving their prison sentences. According to the Center for Community Transitions, at least 95% of people who enter prison will be released. In addition to the Center for Community Transitions, other organizations that offer transitional housing programs to ex-offenders include Goodwill Industries, Exodus Homes/United Way, and LINC Incorporated.

The Goodwill Project Re-entry program, in partnership with the Piedmont Triad Regional Council, provides employment and job training services to ex-offenders to assist with transition to civilian life. Assistance with re-entry generally starts within 30 days of a prisoner's release date. This re-entry program is currently being offered in Buncombe and Henderson counties within the region.

Inmate Release by County of Conviction (2020)		
County	Number	Percent
Buncombe	489	22.1%
Henderson	279	12.6%
Burke	239	10.8%
Rutherford	236	10.7%
McDowell	227	10.3%

Source: NC Department of Public Safety

Figure 22: Inmate release by county of conviction (2020)
Source: Bowen Report 2021, Appendix F

Analysis to Determine the Nature and Extent of Discrimination

Analysis of the Level of Segregation and Spatial Isolation

Census Tracts 9311 and 9312 within the City of Hendersonville have significantly higher Black or African-American populations than the city as a whole. Census Tract 9313 is partially within the City of Hendersonville's city limits (i.e. the Barker Height area is in Unincorporated Henderson County, per Figure22) and has a significantly higher Hispanic or Latino population than the city as whole. Additionally, all three Census Tracts for these populations are contiguous to one another.

City of Hendersonville	Census Tract 9311 Henderson County, North Carolina (37089931100)	Census Tract 9312 Henderson County, North Carolina (37089931200)
Percent Black or African American alone: 8	Percent Black or African American alone: 16.6	Percent Black or African American alone: 12.2
Total Black or African American alone: 1,211	Total Black or African American alone: 385	Total Black or African American alone: 279
Total Population: 15,137	Total Population: 2,324	Total Population: 2,291

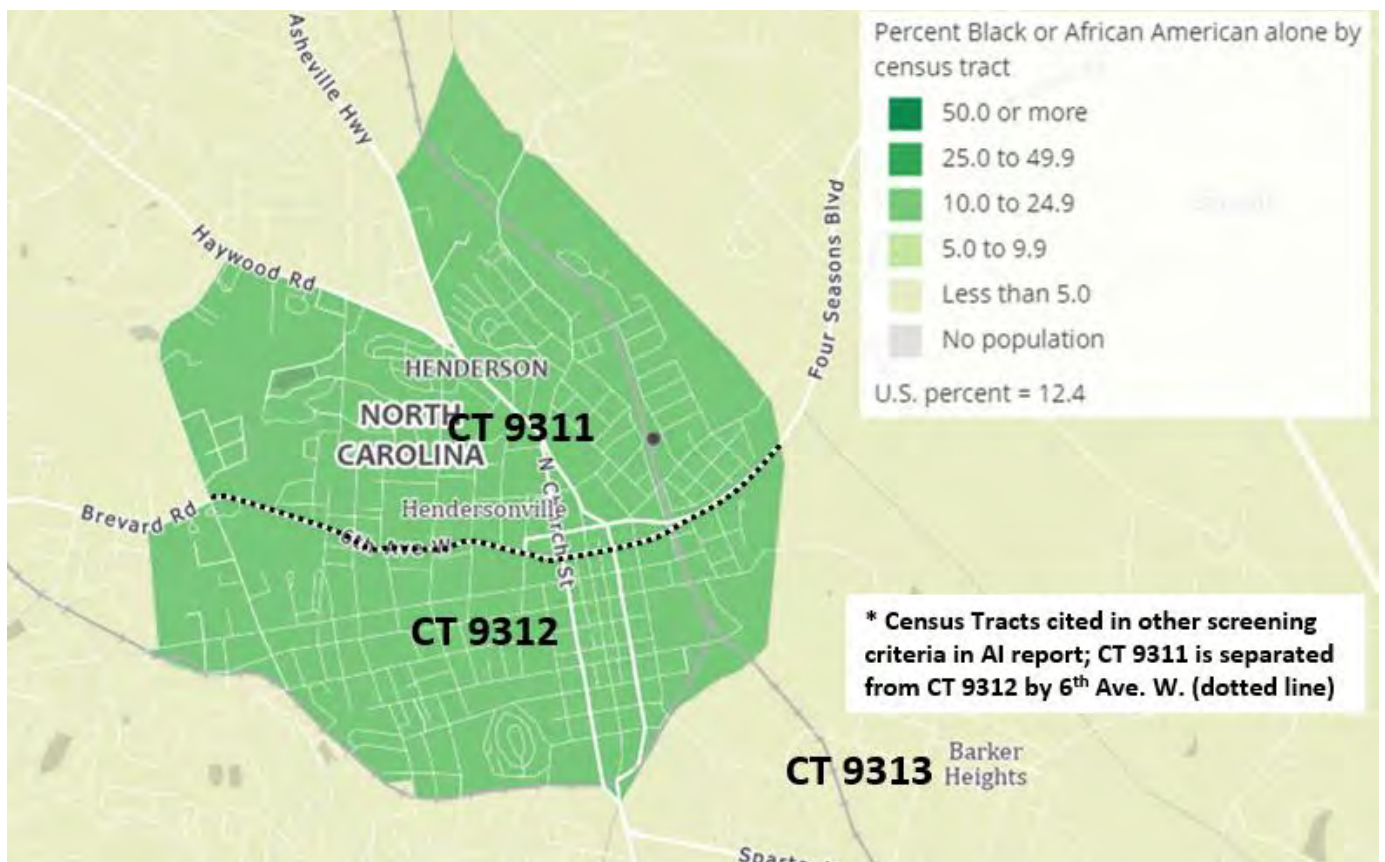


Figure 23: Black or African-American concentrated population within City of Hendersonville
Source: 2020 Census Demographic Data Map Viewer, 2020 Decennial Census

City of Hendersonville	Census Tract 9313 Henderson County, North Carolina (37089931300)*
Percent Hispanic or Latino: 7	Percent Hispanic or Latino: 30.0*
Total Hispanic or Latino: 1,059	Total Hispanic or Latino: 1,215*
Total Population: 15,137	Total Population: 4,055
* Over half of this Census Tract is outside of the city limits of the City of Hendersonville (generally following Spartanburg Hwy.), so the percent and actual number of Hispanic or Latino	

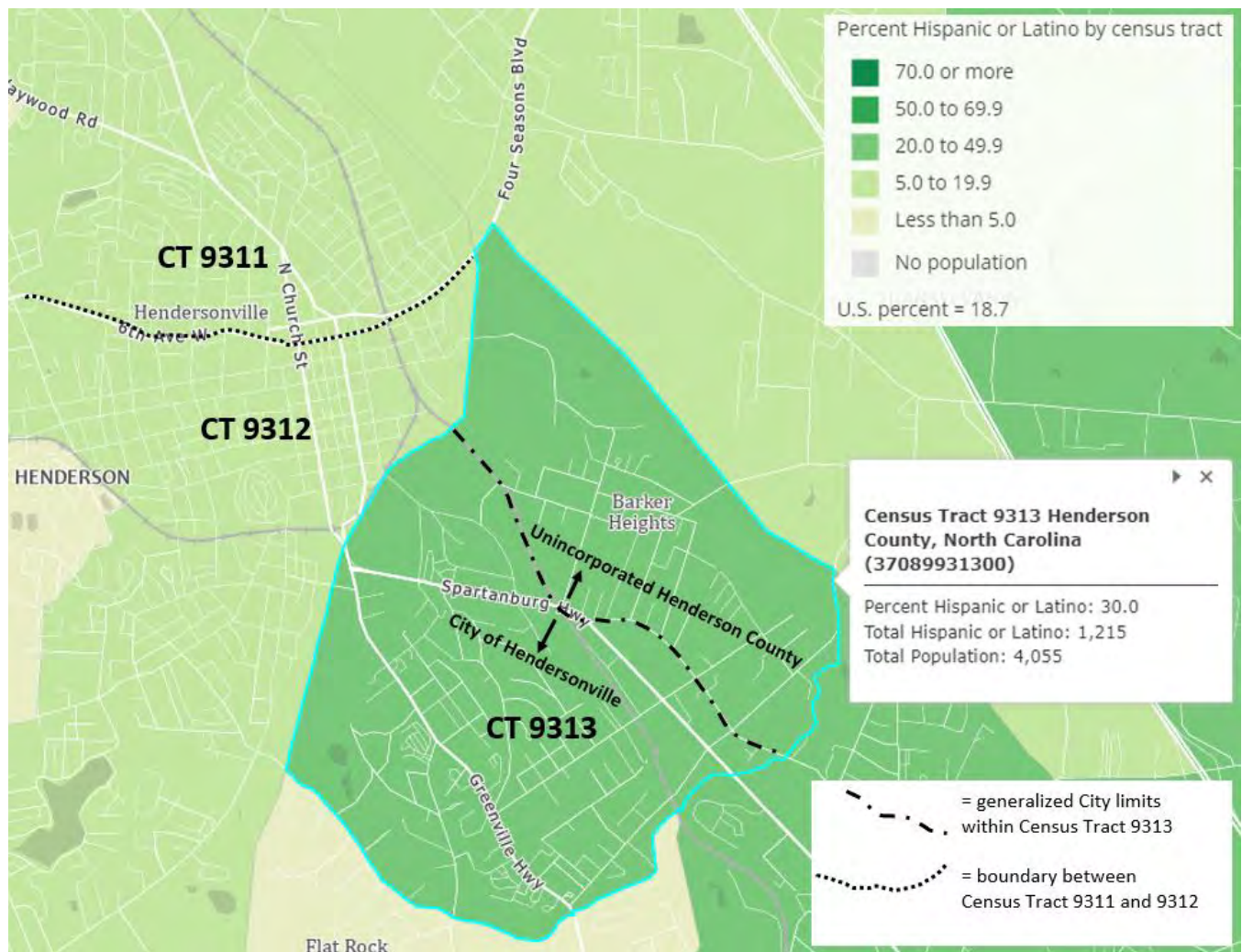


Figure 24: Hispanic or Latino concentrated population within City of Hendersonville
Source: 2020 Census Demographic Data Map Viewer, 2020 Decennial Census

North Carolina Department of Commerce, County Tier Ranking

The North Carolina Department of Commerce annually ranks the state's 100 counties based on economic well-being and assigns each a Tier designation. This Tier system is incorporated into various state programs to encourage economic activity in the less prosperous areas of the state.

The 40 most distressed counties are designated as Tier 1, the next 40 as Tier 2 and the 20 least distressed as Tier 3. **Henderson County is a Tier 3 (least distressed) county.**

Historical Incidences that Contribute to Current Housing Patterns

History of Public Policy Decision on Segregation Within the Community

The City of Hendersonville, like much of the rest of North Carolina, practiced de facto (societally-practiced) and de jure (government-sanctioned) racial segregation until the mid-1960s, with separate community facilities such as schools and public housing for whites and African-Americans.

The current Hendersonville Middle School was historically "The Ninth Avenue School", which was a segregated school for African-American students from 1951-1965 (see Figure 23); schools were officially desegregated in 1965. The school location is within Census Tract 9311, which has a 16.6% African-American population compared the larger City's 8% African-American population.

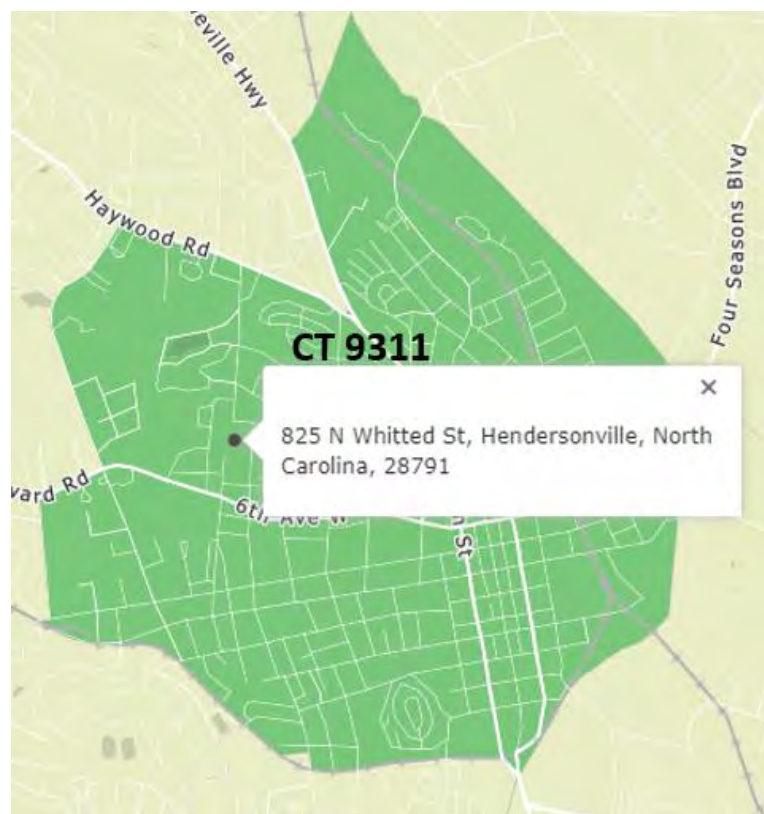


Figure 25: Location of the current Hendersonville Middle School and former location of "The Ninth Avenue School", a segregated school for African-Americans from 1951 until 1965, when official desegregation occurred.

Source: "Students Explore School's History with "Ninth Avenue School Day"

<https://www.hendersoncountypublicschoolsnc.org/blog/2020/02/14/students-explore-schools-history-with-ninth-avenue-school-day/>

Several blocks south of “The Ninth Avenue School”, but still contiguous via Census Tract 9312 (12.2% African- American vs. the larger City’s 8% African-American population), “The Landina Guest House served as a location where African-Americans could rent a room during segregation with a private bath and meals,” a memorandum from City Manager John Connet to the City Council said. “The house was listed in the 1960-1961 Negro Motorist Green Book.”

Operated by Hollis and Ozzie Landrum, the brick home at 710 First Avenue West was new when it served as a refuge for black travelers who were often turned away by segregated lodging businesses. The home was built in 1955 during an era when many Southern states, including North Carolina, retained and strengthened racial segregation laws amidst the larger Civil Rights movement.

The geographic areas encompassing today’s Census Tracts 9311 and 9312 were most likely subject to “redlining”, the restriction of mortgage lending based on race and class, by the Federal Housing Administration (FHA) beginning in 1934. This report’s authors found no official documentation (in map or text) of redlining for the City of Hendersonville, but given the prevalence of redlining across the state (Asheville, Winston-Salem, Charlotte, Greensboro, and Durham have documented maps³), this practice most likely influenced real estate development and the location and availability of housing in these geographic areas until the 1960s (U.S. Civil Rights Act of 1964 and Fair Housing Act of 1968).

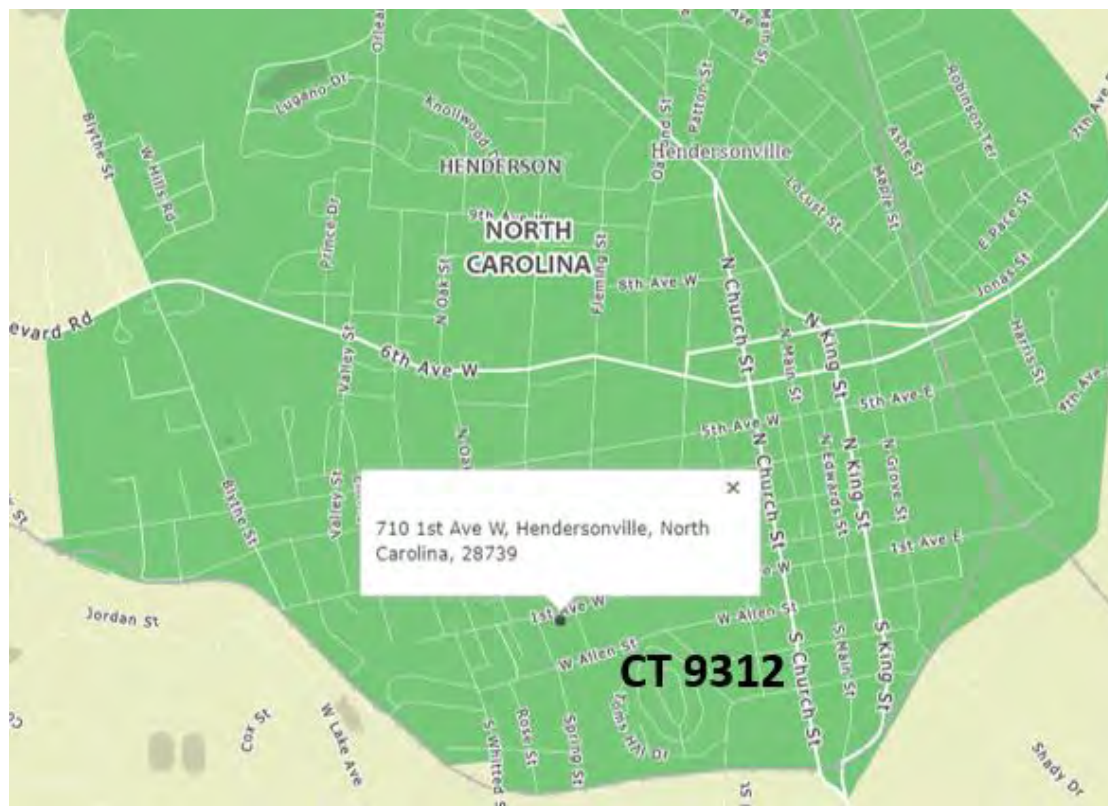


Figure 26: Location of home historically listed in “Negro Motorist Greenbook”; current Census Tract 9312 Henderson County, North Carolina (37089931200)

Source: <https://www.hendersonvillelightning.com/news/11285-first-avenue-home-listed-in-greenbook-to-get-historic-marker.html>

³ <https://dsl.richmond.edu/panorama/redlining/#loc=7/39.215/-86.451>

Discrimination in the Rental Market

Zoning Requirements That Have the Effect of Limiting the Availability of Rental Units

None of the City of Hendersonville's residential-only zoning districts (i.e. R-6 High-Density Residential district) allow Attached Multi-Family housing as Permitted Use. This effectively limits the location and supply of multi-family housing. See *Examination of Public Policy and Programs, Zoning and Land Use Policy, Figure 48* for more information regarding these zoning restrictions.

Location of Rental Units Within Areas of Minority Concentration

The Census Block Groups highlighted below generally correspond with Census Tracts that have minority population concentrations (Census Tract 9311 and 9312 for Black or African-American; Census Tract 9313 for Hispanic or Latino) cited elsewhere in this report.

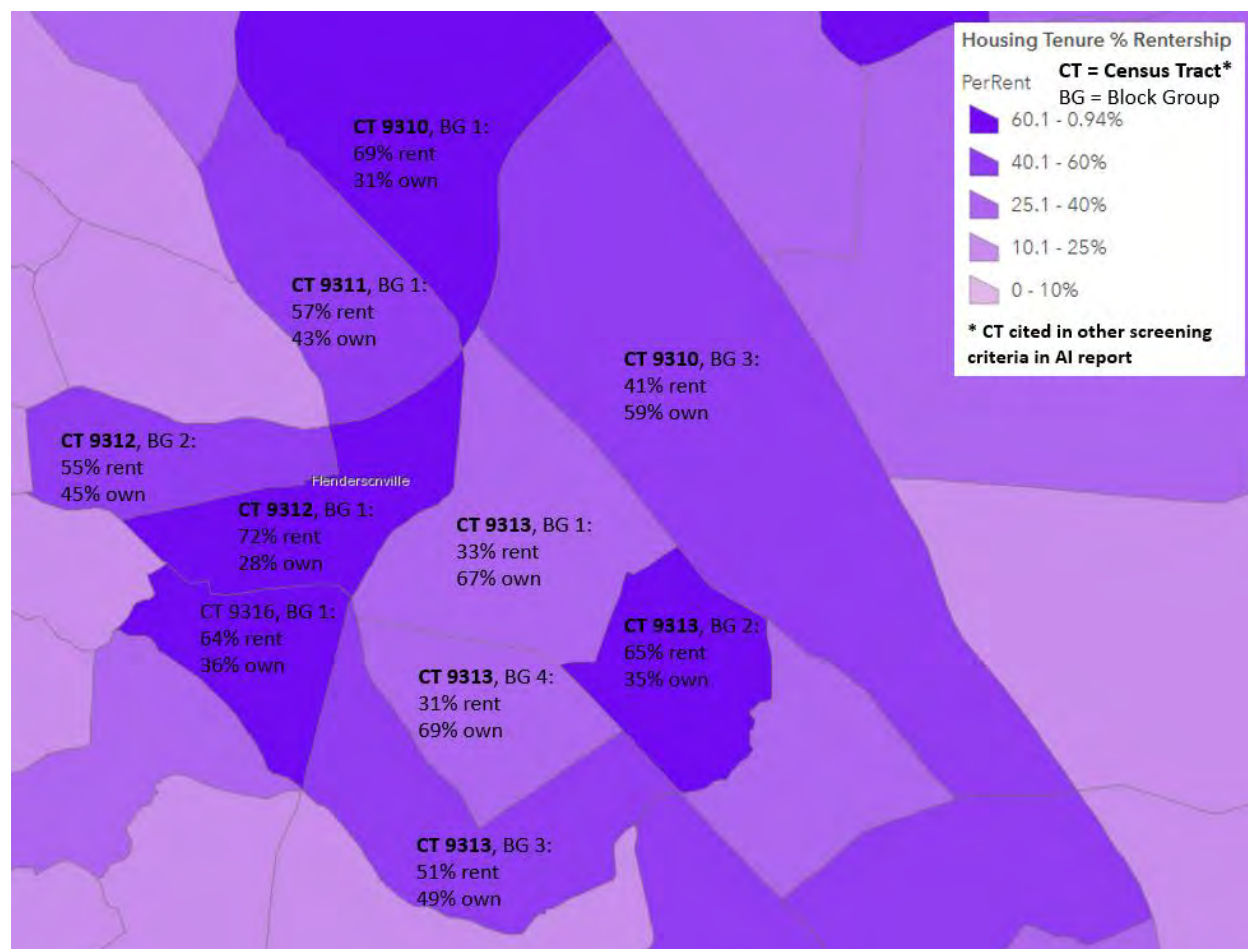


Figure 27: Percent Rental vs. Ownership in Census Block Groups, City of Hendersonville and adjacent areas of Unincorporated Henderson County.

Source: 2020: ACS 5-Year Estimates

Location of Public Housing and Other Government-Subsidized Housing

The City of Hendersonville Housing Authority has two Developments that it manages, Henderson Heights and RTS South. These properties consist of 375 units ranging from OBR to 5BR apartments for low, very low, and moderate income families. Apartments are scattered throughout the City of Hendersonville with 2 elderly-disabled communities in surrounding Henderson County.

Figure 31: Location of Public Housing and Government-Subsidized Housing

Source: <https://egis.hud.gov/cpdm/29> (see following pages) highlights the location of several units of public housing and other government-subsidized housing within Census Tracts 9311, 9312, and 9313, all identified as having higher concentrations of minority populations.

The HUD PHA (Public Housing Agency) code for the City of Hendersonville Housing Authority is NC027 and the HUD code for WNCSource (see below) is NC140. Currently, 651 Section 8 vouchers are in use in the WNC Source (WNC Community Action, Inc.) service area (Transylvania, Henderson Counties). On January 1st, 2022, Western Carolina Community Action changed its name to [WNCSource](#).

Housing Authority:

NC027 Hendersonville Housing Authority

General HA Details

HA Program Type:

Low-Rent

HA Fiscal Year End:

09/30

Last Update:

04/21/2022

HA Inventory Details

Low Rent Inventory Information

Status	Developments	Units
In Management	2	0
In Development	0	0
Total	2	0

Housing Authority:

NC140 WNC Source

General HA Details

HA Program Type:

Section 8

HA Fiscal Year End:

06/30

Last Update:

04/16/2022

HA Inventory Details

Section 8 Inventory Information

Increments	Units
2	651

Figure 28: Screenshots from HUD Inventory Management/Public Housing Information Center (IMS/PIC)
Source: <https://pic.hud.gov/pic/haprofiles/haprofiledetails.asp>

NC140	WNC Source Phone: (828)693-1711 Fax: (828)697-4277 Email: ewhitten@wncsource.org	220 King Creek Blvd. Hendersonville NC , 28792	Section 8
NC027	Hendersonville Housing Authority	203 N JUSTICE Street	Low-Rent

PHA Contact Information

This listing is ordered by city and based on the information in IMS/PIC system.

PHA Code	Name, Phone, Fax, Email	Physical Address	Type
	Phone: (828)692-6175 x16 Fax: (828)693-0601 Email: dbrow@hendersonvilleha.org	HENDERSONVILLE NC , 28739	

Figure 29: PHA Code and Contact Info for Hendersonville Public Housing Agencies (PHAs)
Source: https://www.hud.gov/sites/dfiles/PIH/documents/PHA_Contact_Report_NC.pdf

Use of Vouchers and Section 8 Certificate Holders

The dashboard screenshot below provides a summary highlight of Vouchers/Section 8 use in the City of Hendersonville.

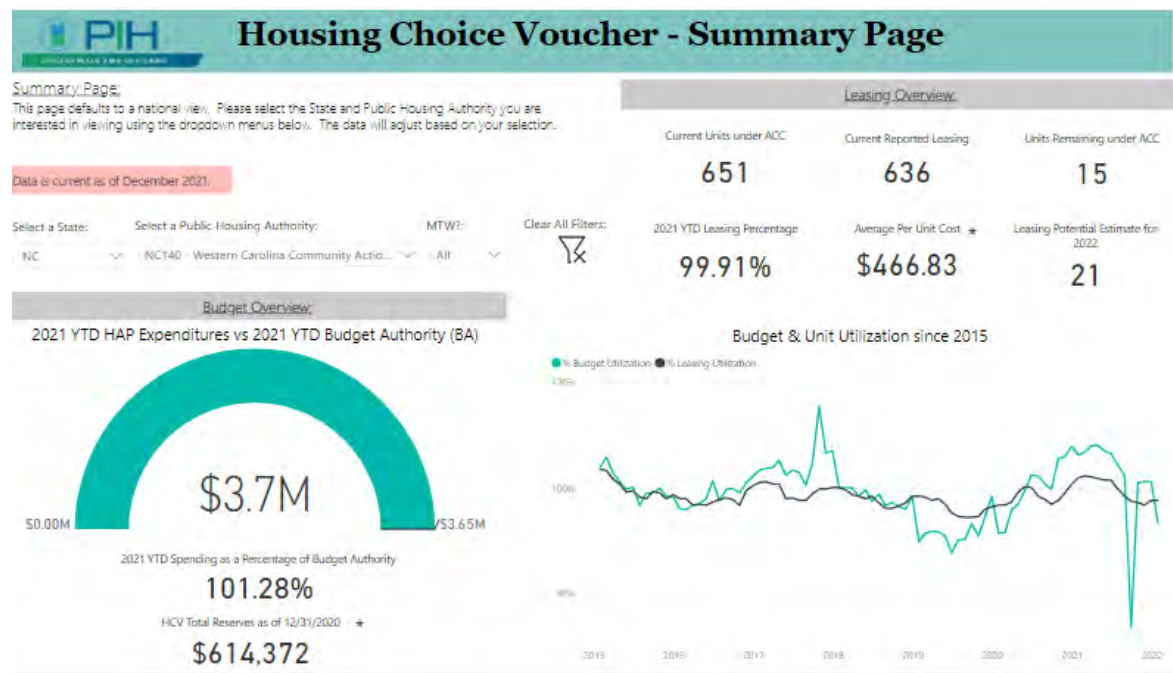


Figure 30: Housing Choice Voucher - Summary Page (for NC140, WNC Source)
Source: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

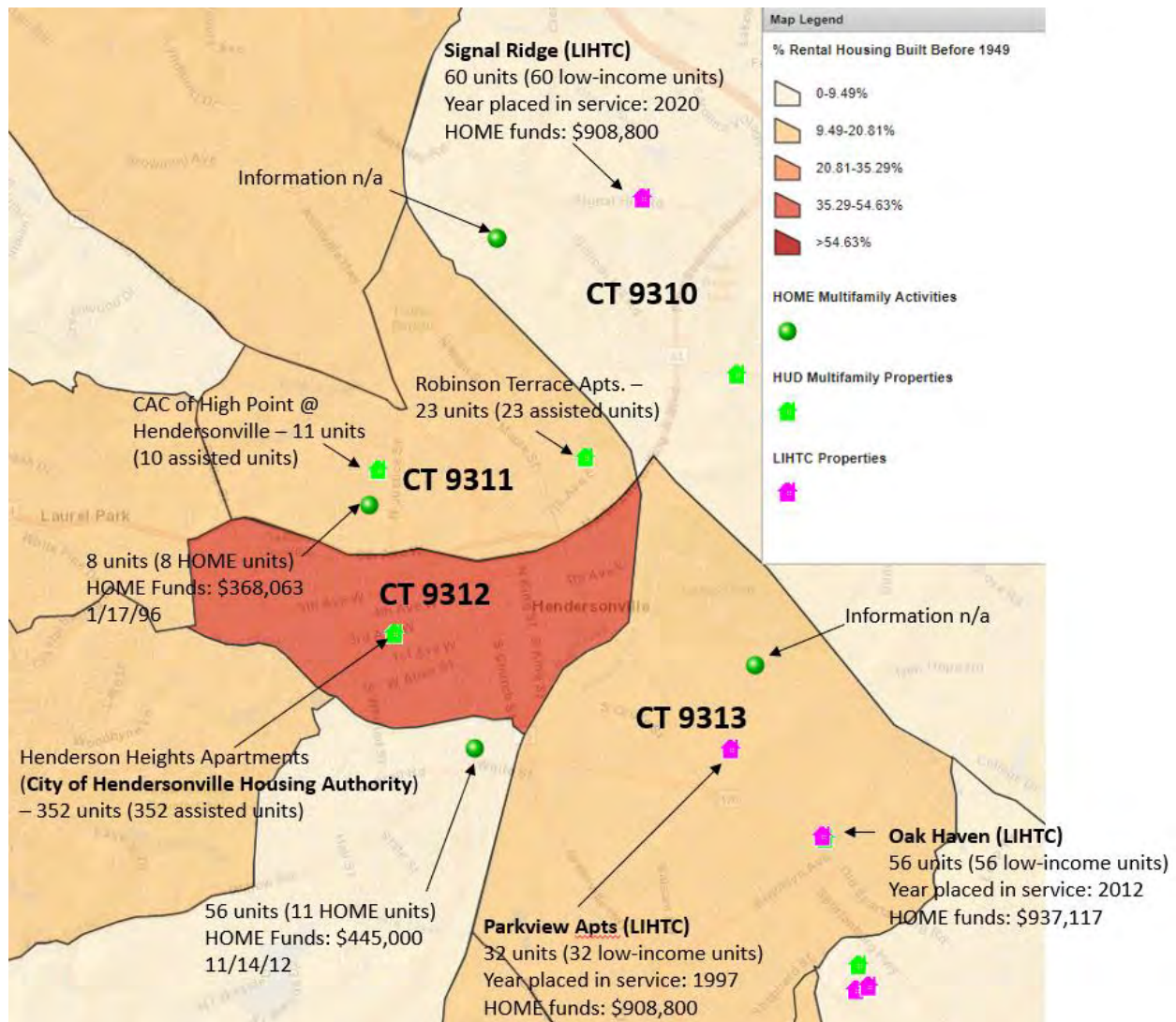


Figure 31: Location of Public Housing and Government-Subsidized Housing
Source: <https://egis.hud.gov/cpdmaps/>

Data from the North Carolina Human Relations Commission (NCHRC), 2016-2021

The following summarizes the fair housing discrimination complaints that were filed with the NCHRC or the U.S. Department of Housing and Urban Development (HUD) and the results of their investigations from July 1, 2016 to June 30, 2021 in Hendersonville County:

- July 1, 2016 to July 30, 2017: No fair housing discrimination complaints filed.
- July 1, 2017 to June 30, 2018: There were **two (2) fair housing discrimination complaints** filed with the NCHRC and HUD in Hendersonville County. *(See below/following page)* Only one (1) complaint was filed within the City of Hendersonville.

<u>NCHRC and HUD Case Number/ City Subject Property is Located</u>	<u>Basis(es)</u>	<u>Issues</u>	<u>Date Case Filed</u>	<u>Date Case Closed</u>	<u>Results of Case Investigation</u>
NCHRC#: 16HO2050 HUD#: 04-17-8698-8 Hendersonville	Race (White); Familial Status (Families with Children)	-Discriminatory advertising, statements, and notices -Discriminatory terms, conditions, privileges, or services and facilities	09/15/2017	03/09/2018	Complainant failed to cooperate with the investigation of the complaint.

- July 1, 2018 to June 30, 2019: No fair housing discrimination complaints filed.
- July 1, 2019 to June 30, 2020: There was **one (1) fair housing discrimination complaint** filed with the NCHRC and HUD in Henderson County. This complaint was not filed within the City of Hendersonville. (i.e. filed in East Flat Rock, NC)
- July 2, 2020 to June 30, 2021: There was **one (1) fair housing discrimination complaint** filed with the NCHRC and HUD in Henderson County. This complaint was not filed within the City of Hendersonville. (i.e. filed in Mills River, NC)

Data from the “Fair Housing Project” (Legal Aid of North Carolina)

The Fair Housing Project of Legal Aid of North Carolina works to eliminate housing discrimination and to ensure equal housing opportunity for all people through education, outreach, public policy initiatives, advocacy and enforcement.

Legal Aid of North Carolina is a statewide, nonprofit law firm that provides free legal services in civil matters to low-income people in order to ensure equal access to justice and to remove legal barriers to economic opportunity.

Discrimination based on disability and race continued to account for the vast majority of housing discrimination complaints filed in North Carolina in 2019.

In 2019, a total of 160 fair housing complaints were filed statewide. Nearly two-thirds of these (98 complaints, making up 61.3% of those filed) were filed in just five counties: Durham (26), Mecklenburg (24), Wake (15), Guilford (14), and Forsyth (11). In 34 other counties, between 1 and 8 complaints were filed, while the remaining 61 counties in North Carolina did not have any fair housing complaints filed in 2019.

The most common bases for complaints filed in 2019 were disability (92 complaints filed or 57.5%), race (53 or 33.1%), national origin (21 or 13.1%), sex (20 or 12.5%), familial status (12 or 7.5%), and retaliation (12 or 7.5%).

Here’s how Henderson County compares to State averages and two counties with comparably-sized populations and demographic profiles:

State average: 37.93 complaints/100,000

Henderson County: 39 complaints / 100,000

In 2010, Brunswick County, NC (on the state's southeastern coast), had almost 80% White population vs. a 12% Non-White population, with 37 complaints filed. That same year, Henderson County, NC had an 86% White population vs. an 8% Non-White population, with 39 complaints filed.

County	Complaints Filed	2010 Population	Complaints / 100,000	White Alone	White %	Black Alone	Black %	Some Other Race	Other Race %
Brunswick	37	107,431	34.44	85,645	79.72%	11,503	10.71%	1,687	1.57%
Craven	27	103,505	26.09	69,475	67.12%	22,368	21.61%	3,230	3.12%
Henderson	39	106,740	36.54	91,734	85.94%	3,423	3.21%	5,358	5.02%

Figure 32: Comparison of NC Counties with Similar Numerical Populations to Henderson County; Henderson and Brunswick Counties have similar White/Non-White Demographic Compositions

Source: B01001, Sex by Age, 2020: ACS 5-Year Estimates Subject Table; <https://www.fairhousingnc.org/wp-content/uploads/2021/04/2020-State-of-Fair-Housing-in-North-Carolina-Final.pdf>

Discrimination in the Sales Market

Local Association of Realtors Use of an MLS Service

The Hendersonville Board of Realtors® (Henderson, Polk) uses Canopy MLS:
<https://carolinamls.happyfox.com/kb/article/66-canopy-mls-service-area/>

Local Association of Realtors Being a VAMA Signatory

In regard to Voluntary Affirmative Marketing Agreements (VAMA), this report's authors did not find any evidence of the Hendersonville Board of Realtors® (Henderson, Polk) affirmatively being a signatory to VAMA. However, the realtor association does follow the National Association of Realtors (NAR) Code of Ethics which includes the following standards:

Duties to the Public

Article 10

Realtors® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. Realtors® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. (Amended 1/14)

Realtors®, in their real estate employment practices, shall not discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. (Amended 1/14)

Source: <https://www.hbor-nc.com/why-use-a-realtor/code-of-conduct.html>

Evidence of Protected Class Members Being Subjected to Steering or Blockbusting

This report's authors did not find any evidence in the affirmative of local real estate agents practicing steering (i.e. guiding potential buyers to certain neighborhood based on the buyer's race) or blockbusting (i.e. real estate agents provoking potential sellers to "sell cheap" based on rumors of people of a different race than the majority of current homeowners/rents moving into a given area).

Rates of Homeownership vs. Rentership

Rates of homeownership vs. rentership by race in Census Tracts 9310, 9311, 9312, and 9313 (noted in other figures in this report) are noted in the map figure below.

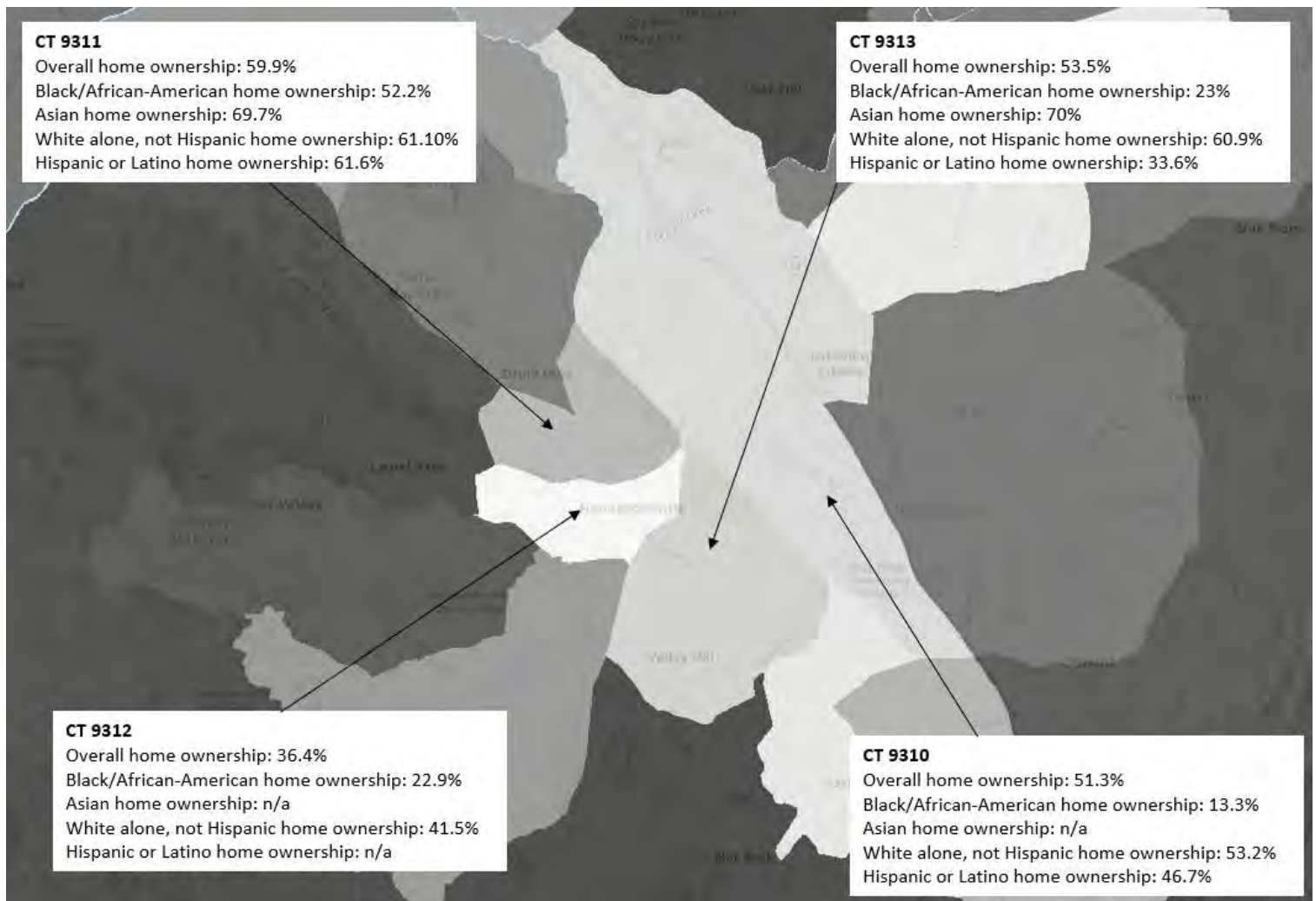


Figure 33: Percentage Rates of Homeownership by Race (Census Tracts that overlap previously highlighted Block Groups and Census Tracts for other relevant Analysis of Impediments (AI) criteria)

Source: <https://www.arcgis.com/apps/mapviewer/index.html?layers=758772702a8649b8b021e1b4ee1f6888>

Discrimination in Financing

Home Mortgage Disclosure Act Information

Looking at mortgage denial rates in 2020 by race/ethnicity, the White population of Henderson County had a denial rate (10.89%) that mirrored the Countywide rate of 10.99%. Hispanic or Latino applicants had the next highest rate of denial (18.37%), followed by Asians (20.41%), Black or African-Americans (23.08%), American Indian or Alaska Natives (23.32%) and Hawaiian Native or Pacific Islanders (30.77%). This pattern suggests that as of 2020, non-Whites in Henderson County may be anywhere from 1.5 to 3 times as likely to be denied a mortgage than Whites.

Henderson County

Race/Ethnicity	Percent of Total Loan Applications	Loan Originated	Application approved, but not accepted	Denied	Application Withdrawn by Applicant	Closed for Incompleteness
American Indian or Alaska Native	0.18%	42.11%	0%	26.32%	10.53%	21.05%
Asian	0.93%	45.92%	1.02%	20.41%	17.35%	13.27%
Black or African-American	1.48%	50.00%	2.56%	23.08%	15.38%	7.69%
Hawaiian Native or Pacific Islander	0.12%	46.15%	7.69%	30.77%	7.69%	7.69%
White	77.80%	64.38%	2.60%	10.89%	13.73%	5.36%
Hispanic or Latino	2.79%	52.72%	2.04%	18.37%		
Info not provided by applicant	18.35%	38.98%	1.97%	9.47%	12.01%	5.90%
TOTAL COUNTYWIDE	n/a	59%	2.45%	10.99%	13.45%	5.62%

Figure 34: Mortgage denial rates by race/ethnicity, Henderson County, 2020

Source: Home Mortgage Disclosure Act (HMDA), HMDA Data Browser, <https://ffiec.cfpb.gov/data-browser/>

Looking at mortgage denial rates by sex, males (14.32%) have a higher, but not significantly higher denial rate (variable by 10%) than females (12.54%) or joint applicants (couples, 9.13%).

Henderson County

Sex	Percent of Total Loan Applications	Loan Originated	Application approved, but not accepted	Denied	Application Withdrawn by Applicant	Closed for Incompleteness
Male	24.76%	59.27%	3%	14.32%	15.09%	5.91%
Female	19.85%	60.39%	2.83%	12.54%	13.85%	7.51%
Joint	41.93%	67.13%	2.36%	9.13%	13.34%	4.69%
Sex Not Available	13.87%	33.56%	1.16%	8.49%	10.27%	5.27%
TOTAL COUNTYWIDE	n/a	59%	2.45%	10.99%	13.45%	5.62%

Figure 35: Mortgage denial rates by Sex, Henderson County, 2020

Source: Home Mortgage Disclosure Act (HMDA), HMDA Data Browser, <https://ffiec.cfpb.gov/data-browser/>

Looking at mortgage denial rates by age, applicants under 25 (17.39% denial rate) are about 1.7 times more likely to be denied for a mortgage than applicants aged 65-74 (10.48% denial rate), who have the lowest denial rate. This is likely due to applicants under 25 not having significant income/savings and/or credit histories compared to people over 65, many of whom have savings and are entering retirement.

Henderson County						
Age	Percent of Total Loan Applications	Loan Originated	Application approved, but not accepted	Denied	Application Withdrawn by Applicant	Closed for Incompleteness
<25	1.75%	56.52%	4.35%	17.39%	11.96%	8.15%
25-34	13.76%	63.29%	2.00%	11.18%	14.08%	6.69%
35-44	18.57%	64.81%	1.89%	11.20%	12.74%	5.93%
45-54	17.91%	61.66%	3.02%	12.73%	13.47%	6.42%
55-64	18.20%	64.46%	2.45%	11.59%	14.09%	5.01%
65-74	16.67%	63.13%	2.68%	10.48%	14.99%	5.87%
>74	7.11%	55.94%	4.27%	12.02%	19.89%	5.87%
TOTAL COUNTYWIDE	n/a	59.00%	2.45%	10.99%	13.45%	5.62%

Figure 36: Mortgage denial rates by Sex, Henderson County, 2020

Source: Home Mortgage Disclosure Act (HMDA), HMDA Data Browser, <https://ffiec.cfpb.gov/data-browser/>

Local Financial Institutions Funding Housing Projects

Local financial institutions in Hendersonville have supported the development of affordable housing. In February 2006, the Federal Home Loan Bank of Atlanta's Affordable Housing Program (AHP) coordinated with HomeTrust Bank (headquartered in Asheville, with branches in Henderson County) for 20 units of affordable housing.

Shuey Knolls Homes (NOTE: Not in City of Hendersonville:
<https://www.neighborhoods.com/shuey-knolls-hendersonville-nc>)
 Hendersonville, NC
 Member: HomeTrust Bank
 Sponsor: Henderson County Habitat for Humanity
 Grant: \$120,000 for 20 units

<https://www.globenewswire.com/en/news-release/2006/02/14/339447/2953/en/North-Carolina-to-Receive-3-2-Million-for-Affordable-Housing.html>

Other local financial institutions that have supported Housing Assistance Corporation (Henderson County include United Community Bank and First Citizens Bank. (Source: <https://www.housing-assistance.com/new-page-1>)

Discrimination in the Building and Construction Industry

Local Building Code inclusion of Requirements of the Federal Fair Housing Act

The City of Hendersonville and Henderson County adhere to the North Carolina State Building Code (International Code Council) and the North Carolina Fair Housing Act,⁴ which addresses accessibility requirements and design standards.

⁴A Quick Guide to the Design & Construction Standards of the North Carolina Fair Housing Act
<https://www.elliswinters.com/wp->

Only projects that meet the definition of a “covered multifamily dwelling” must meet the accessibility standards of the act. If a building has four or more units and an elevator, then the entire building, including common areas, will be covered by the act. If the building has four or more units but lacks an elevator, then only the ground floor units and common areas will be covered. In other words, if a building only has stairs but no elevators, then only the ground floor units must comply with the design standards. Seven key design standards of the North Carolina Fair Housing Act are:

1. a building entrance on an “accessible route;”
2. public and common areas readily accessible and usable by handicapped people;
3. and an “accessible route” into and through all dwellings and units;
4. doors wide enough to accommodate wheelchairs;
5. light switches, electrical outlets, and thermostats in “accessible locations;”
6. bathroom walls reinforced so as to allow the installation of grab bars; and
7. space in the kitchens and bathrooms to allow a person in a wheelchair to maneuver.

Single-Family and Multi-Family Dwellings Funded by Local, State, or Federal Funds in last 20 Years

The number of Low-Income Housing Tax Credit (LIHTC) and government-subsidized housing units built in the last 20 year is estimated to be 388 housing units.

Project Type	Project Name	Project Address	Project City	Project State	Project ZIP	Total Number of Units	Total Low-Income Units	Placed-In-Service Year
LIHTC	Hillside Commons Apts	189 Hillside Commons Dr.	Hendersonville	NC	28792	36	36	2003
LIHTC	Highland View Apts	500 King Creek	Hendersonville	NC	28792	28	28	2006
LIHTC	Sugar Hill Apartments	66 Ladies Mantle Court	Hendersonville	NC	28973	40	40	2007
LIHTC	Oak Haven	1308 Old Spartanburg Rd	Hendersonville	NC	28792	56	56	2012
LIHTC	Cedar Terrace	125 Francis Rd.	Hendersonville	NC	28792	80	80	2017
LIHTC	Signal Ridge	469 Signal Hill Rd.	Hendersonville	NC	28738	60	60	2020
LIHTC	Oklawaha Village	1818 N. Main St.	Hendersonville	NC	28792	78	78	2020
GSS (Govt. Subsidized)	King Creek Cottages	201 King Creek Blvd.	Hendersonville	NC	28792	10	10	2005
						388 units built in last 20 years		

Figure 37: Estimated Number of Tax Credit and Subsidized Housing Units Built since 2002.

Source: 2021 Bowen Report and <https://lihtc.huduser.gov/>

Housing Project Compliance with FFHA, ADA, and Section 504 Requirements

Projects are typically in compliance with FFHA requirements and ADA/Section 504 requirements. For example, the City of Hendersonville converted Grey Mill, a hosiery mill built in 1918, which ceased operations in 1967, into a 35-unit apartment building with fully-accessible units.

Identified Housing Need for Persons with Disabilities

See heading *Analysis to Determine Disproportionate Housing Need*, sub-heading *Populations with Disproportionate Needs*, sub-sub heading *Blind & Disabled Population*.

Identified Community Need for Construction of More Affordable Housing: Housing Gap/Needs Estimates

Rental Housing -Costs

Projects financed and developed under federal or state programs often have residency income restrictions based on a percentage of that county's Area Median Household Income (AMHI). The following table summarizes the household income limits by household size for the most commonly used percentages of AMHI for each study area (income limits used in this study are shown in bold print).

County	Persons	Percentage of Area Median Household Income				
		30%	50%	60%	80%	120%
Henderson	1 Person	\$15,780	\$26,300	\$31,560	\$42,080	\$63,120
	2 Person	\$18,030	\$30,050	\$36,060	\$48,080	\$72,120
	3 Person	\$20,280	\$33,800	\$40,560	\$54,080	\$81,120
	4 Person	\$22,530	\$37,550	\$45,060	\$60,080	\$90,120

Figure 38: Bowen Report 2021, HOUSING GAP/NEEDS ESTIMATES, pg. 212

Looking across two sets of data (below), a 2-bedroom housing unit costs on average \$1,267 per month, or \$15,204 per year.

Market	Fair Market Rents (2021)				
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
Henderson	\$1,096	\$1,099	\$1,279	\$1,751	\$2,213

Source: Novogradac, Inc.

County	Estimated Mean Renter Wage	Two-Bedroom FMR	Rent Affordable at Median Renter Household Income	Rent Affordable at 30% AMHI	Rent Affordable with Full-time Job Paying Mean Renter Wage	Income Required to Afford Two-Bedroom FMR				
						Income	Housing Wage	Work Hours per week at Minimum Wage	Number of Jobs at Minimum Wage	Work Hours per week at Mean Renter Wage
Henderson	\$11.95	\$1,255	\$841	\$544	\$621	\$50,200	\$24.13	133	3.3	81

Source: National Low Income Housing Coalition (NLIHC) Out of Reach 2020
Notes: "Affordable" rents represent the generally accepted standard of spending no more than 30% of gross income on gross housing costs.
FMR – Fair Market Rent
AMHI – Area Median Household Income

Figure 39: Bowen Report 2021, Housing Supply, pg. 183 (above); Addendum, Special Needs Population, F-10 (below).

Rental Housing -Supply

The following table summarizes the region's **rental housing gap estimates (number of units needed or could be supported)** using North Carolina Housing Finance Agency (NCHFA) methodology.

Study Area	NCHFA Format							
	Rental Housing Gap Estimates – Number of Units Needed by AMHI Level							
	≤50% AMHI		51%-80% AMHI		81%-120% AMHI		Total	
	Family	Senior	Family	Senior	Family	Senior	Family	Senior
Henderson	1,149	603	240	215	261	137	1,650	955

Source: Bowen National Research

Figure 40: Bowen Report 2021, HOUSING GAP/NEEDS ESTIMATES Rental Housing Gap (NCHFA), pg. 214

The following table summarizes the region's **rental housing gap estimates (number of units needed or could be supported)** by the various income segments following HUD guidelines. The largest overall housing gaps are shown in **red**.

Study Area	HUD Format							
	Rental Housing Gap Estimates – Number of Units Needed by AMHI Level							
	≤50% AMHI		51%-80% AMHI		81%-120% AMHI		Total	
	Family	Senior	Family	Senior	Family	Senior	Family	Senior
Henderson	1,202	473	480	201	326	131	2,008	805

Source: Bowen National Research

Figure 41: Bowen Report 2021, HOUSING GAP/NEEDS ESTIMATES Rental Housing Gap (HUD), pg. 215

For-Sale Housing – Costs

Typically, in healthy and well-balanced housing markets, availability rates are between 2.0% and 3.0%, though due to recent national housing market pressures it is not uncommon for most markets to have an availability rate below 2.0%. As such, the overall region's available for-sale housing supply is extremely low. Out of an 18-county WNC region, only Burke County (0.3%) and McDowell County (0.4%) have lower rates of housing availability than Henderson County (0.6%).

	Available For-Sale Housing						
	Total Available Units	% Share of Region	Availability Rate*	Average List Price	Median List Price	Average Days On Market	Average Year Built
Henderson	227	9.1%	0.6%	\$697,799	\$449,000	74	1987

Source: Multiple Listing Service, Realtor.com and Bowen National Research

*Availability rate is derived by dividing the available units by the total of available and owner-occupied units.

Figure 42: Bowen Report 2021, Housing Supply, pg. 198.

Homes listed at \$299,999 or less are generally considered affordable for the region and Henderson County, yet only 53 homes (17 at <\$199,999; 36 at <\$299,999) were available in Henderson County in December 2021.

	Available For-Sale Housing Units by List Price									
	<\$100,000		\$100,000 - \$199,999		\$200,000 - \$299,999		\$300,000 - \$399,999		\$400,000+	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Henderson	0	0.0%	17	7.5%	36	15.9%	50	22.0%	124	54.6%

Source: Multiple Listing Service, Realtor.com and Bowen National Research

Figure 43: Bowen Report 2021, Housing Supply, pg. 205.

The following table summarizes the distribution of available for-sale units by study area and price point. For two-bedroom housing units, the median price was \$275,000, but three-bedroom housing units were had the greatest availability (127 housing units) with a significantly higher median price of \$399,999. Housing at this price point is generally not attainable for individuals and households needing affordable housing.

	Available For-Sale Housing Units by Bedroom Type							
	Studio/One-Br.		Two-Bedroom		Three-Bedroom		Four-Bedroom+	
	Number (Share)	Median Price	Number (Share)	Median Price	Number (Share)	Median Price	Number (Share)	Median Price
Henderson	4 (1.8%)	\$149,000	41 (18.1%)	\$275,000	127 (55.9%)	\$399,999	55 (24.2%)	\$775,000

Source: Multiple Listing Service, Realtor.com and Bowen National Research

Figure 44: Bowen Report 2021, Housing Supply, pg. 206.

For-Sale Housing - Supply

The following table summarizes the region's for-sale housing gap estimates (number of units needed or could be supported) by various income segments following NCHFA guidelines. It is important to point out that the general occupancy projects (referred to as "Family") are open to all income-eligible households, regardless of age. The largest overall housing gaps are shown in **red**.

Study Area	NCHFA Format							
	Owner Housing Gap Estimates – Number of Units Needed by AMHI Level							
	<50% AMHI		51%-80% AMHI		81%-120% AMHI		Total	
	Family	Senior	Family	Senior	Family	Senior	Family	Senior
Henderson	262	295	1	62	48	7	311	364

Source: Bowen National Research

Figure 45: Bowen Report 2021, HOUSING GAP/NEEDS ESTIMATES For-Sale Housing Gap (NCHFA), pg. 219

The following table summarizes the region's **for-sale housing gap estimates (number of units needed or could be supported)** by the various income segments following HUD guidelines. The largest overall housing gaps are shown in **red**.

Study Area	HUD Format							
	Owner Housing Gap Estimates – Number of Units Needed by AMHI Level							
	<50% AMHI		51%-80% AMHI		81%-120% AMHI		Total	
	Family	Senior	Family	Senior	Family	Senior	Family	Senior
Henderson	490	281	336	209	358	220	1,184	710

Source: Bowen National Research

Figure 46: Bowen Report 2021, HOUSING GAP/NEEDS ESTIMATES For-Sale Housing Gap (HUD), pg. 221

Environmental Justice Discrimination

Areas Without Public Water and/or Sewer Services in Minority and/or Low-Income Areas

A low-income area immediately southeast of downtown Hendersonville (CT 9313) lacks sewer infrastructure, as shown by roughly the same general area highlighted by the dashed line in illustrations below. Census Tract 9313 is both low-income and 30% Hispanic or Latino.

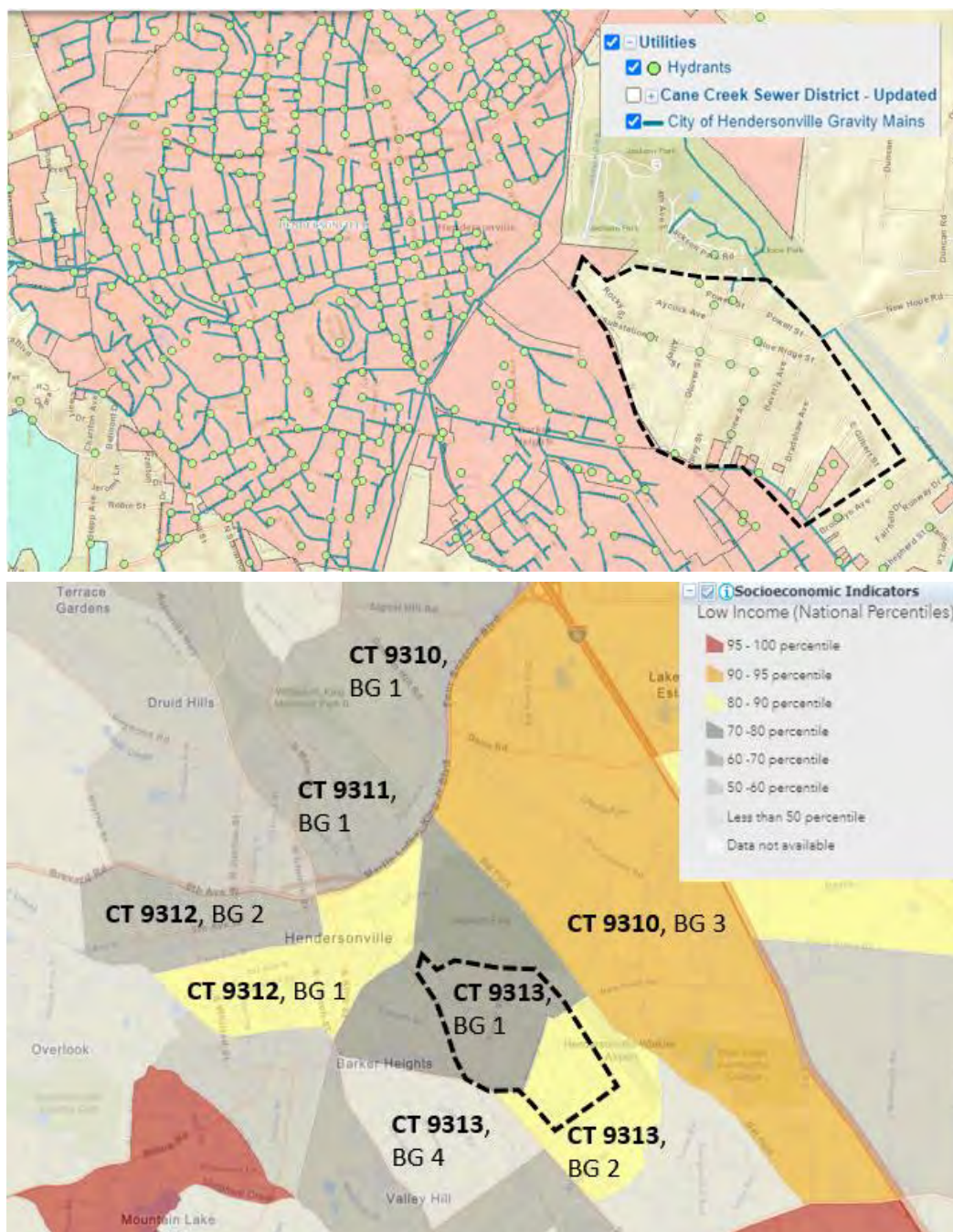


Figure 47: Low-income area southeast of downtown Hendersonville that lacks sewer infrastructure
Source: Henderson County GIS, <https://henderson.roktech.net/gomaps4/?mapName=All%20Layers#>,
<https://ejscreen.epa.gov/mapper/>

Locations of Hazardous Materials in Proximity to Low-Income and Minority-Concentrated Areas

The North Carolina Department of Environmental Quality (NCDEQ) maintains active mapped inventories of urban environment hazards including underground storage tanks (USTs) and brownfield sites (see map examples on the following pages).

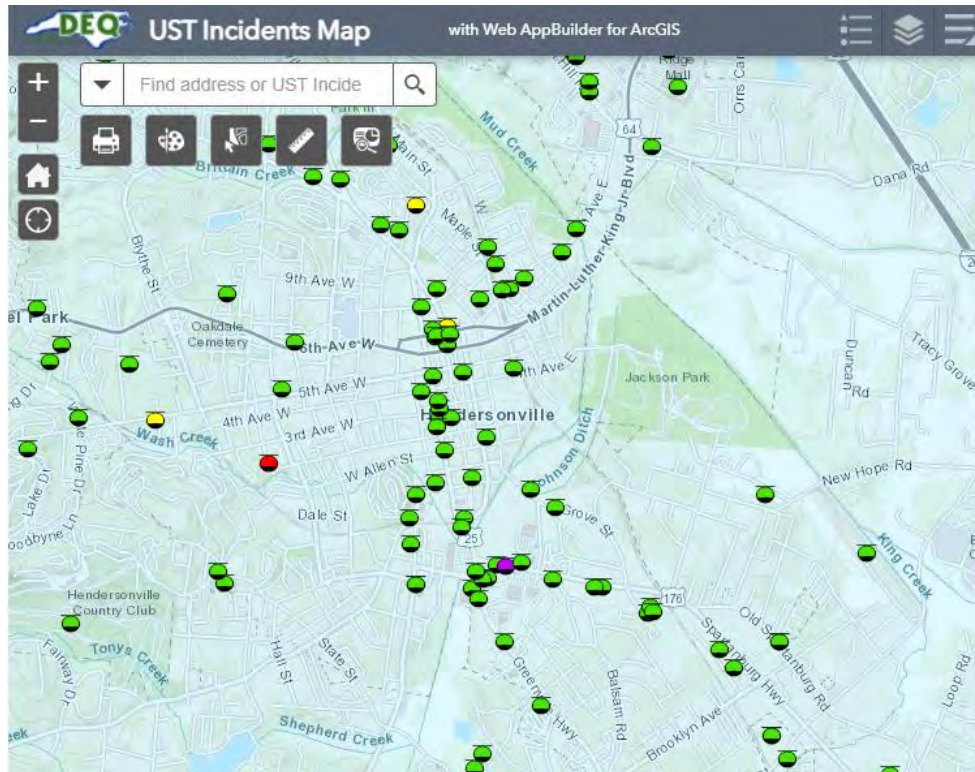


Figure 48: NCDEQ Underground Storage Tanks (UST) Incidents Map

Source: <https://deq.nc.gov/about/divisions/waste-management/waste-management-rules-data/waste-management-gis-maps/rust-map>



Figure 49: Prevalence of Underground Storage Tanks in Census Tracts Cited in this report
Source: <https://ejscreen.epa.gov/mapper/>, 2015-2019 ACS

Locations of Superfund Sites and Local, State, and Federal Efforts to Remove Environmental Hazards

NCDEQ's Division of Waste Management's Superfund Section investigates, prioritizes, monitors and remediates uncontrolled and unregulated hazardous substance and waste disposal sites in North Carolina. Three branches of the Superfund section cleanup sites seek compliance by responsible parties and respond to emergency threats using both state and federal authorities:

- The state-funded [Inactive Hazardous Sites Branch](#) addresses contamination at more than 2000 chemical spill or disposal sites and 676 landfills that operated prior to the 1982 institution of state permit requirements, under authority of the North Carolina Inactive Hazardous Sites Response Act (NC General Statute §130A-310 et seq);
- The Special Remediation Branch addresses contamination at dry cleaner sites, under the [Dry-cleaning Solvent Cleanup Act](#) of 1997 (NC General Statute §130A-310 et seq) and its amendments, funded by receipts from taxes on dry-cleaning services and on dry-cleaning solvents. The branch also oversees voluntary cleanups through the Manufactured Gas Plant Initiative.
- The [Federal Remediation Branch](#) works cooperatively with the U.S. Environmental Protection Agency (EPA) to implement the federal Superfund program under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The section helps EPA apply their resources on sites with the most severe contamination, and on those needing immediate emergency actions, while working to identify those few sites where federal enforcement authority will be appropriate.

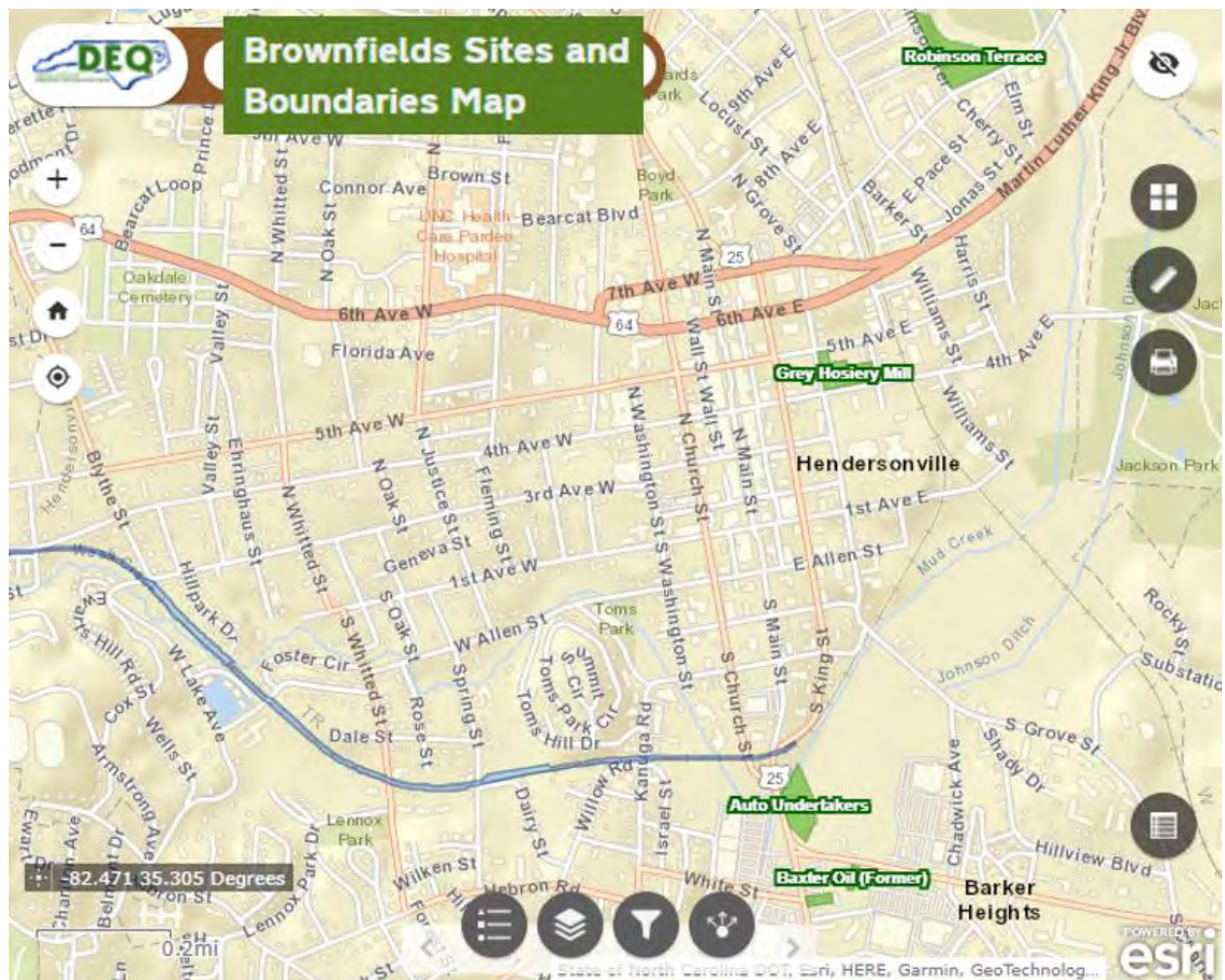


Figure 50: NCDEQ Brownfields Sites and Boundaries Map

Source: <https://deq.nc.gov/about/divisions/waste-management/science-data-and-reports/gis-maps/brownfields-projects-map-inventory-and-document-download>

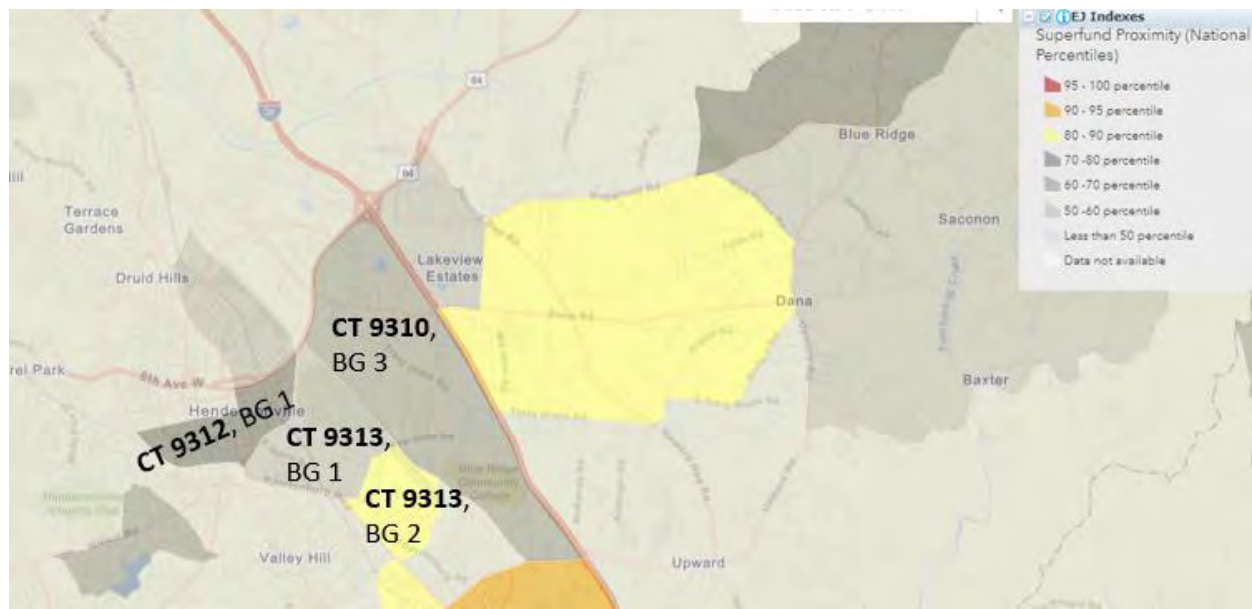


Figure 51: Superfund proximity

Source: <https://ejscreen.epa.gov/mapper/>, 2015-2019 ACS

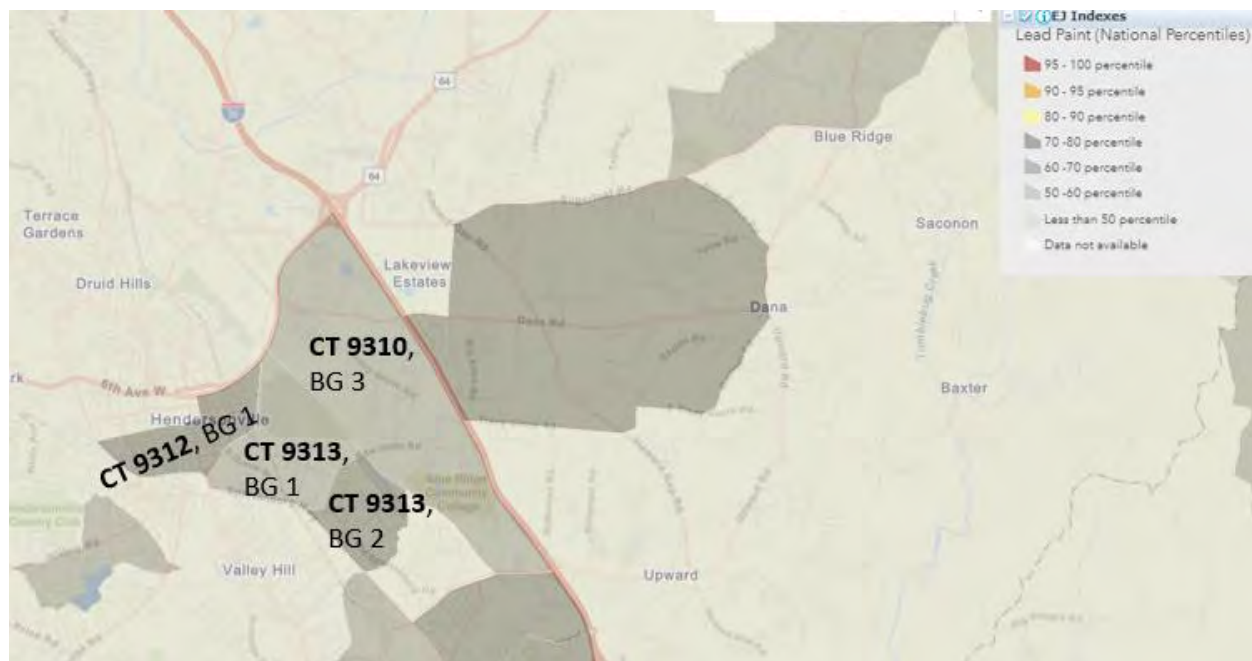


Figure 52: Lead paint proximity

Source: <https://ejscreen.epa.gov/mapper/>, 2015-2019 ACS

Fair Housing Enforcement

See **Data from the North Carolina Human Relations Commission (NCHRC), 2016-2021** (previous pages).

Fair Housing Education and Outreach Efforts

The Henderson County Planning Department contains a web page with Fair Housing Compliant resources:

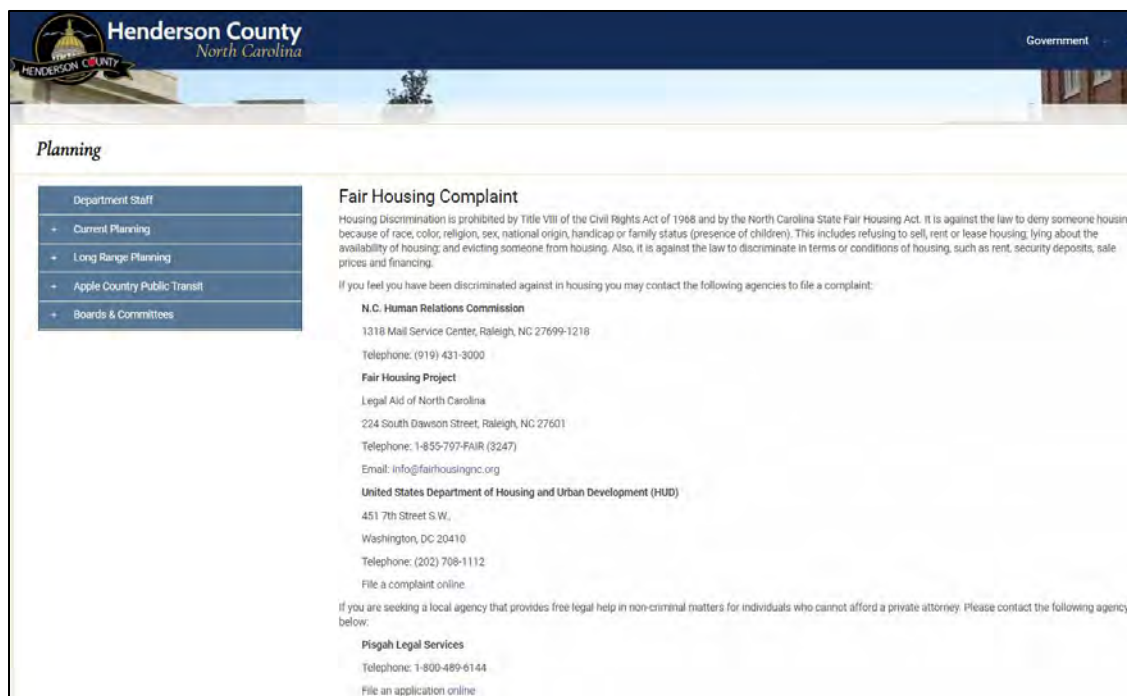


Figure 53: Henderson County Fair Housing Complaint web page

Source: <https://www.fairhousingnc.org/wp-content/uploads/2021/04/2020-State-of-Fair-Housing-in-North-Carolina-Final.pdf>

Additionally, the City of Hendersonville has a web page for Title VI (Title Six, Civil Rights Act of 1964) and Americans with Disabilities Act (ADA, passed in 1990), listing persons directly responsible for receiving complaints. (see following page)

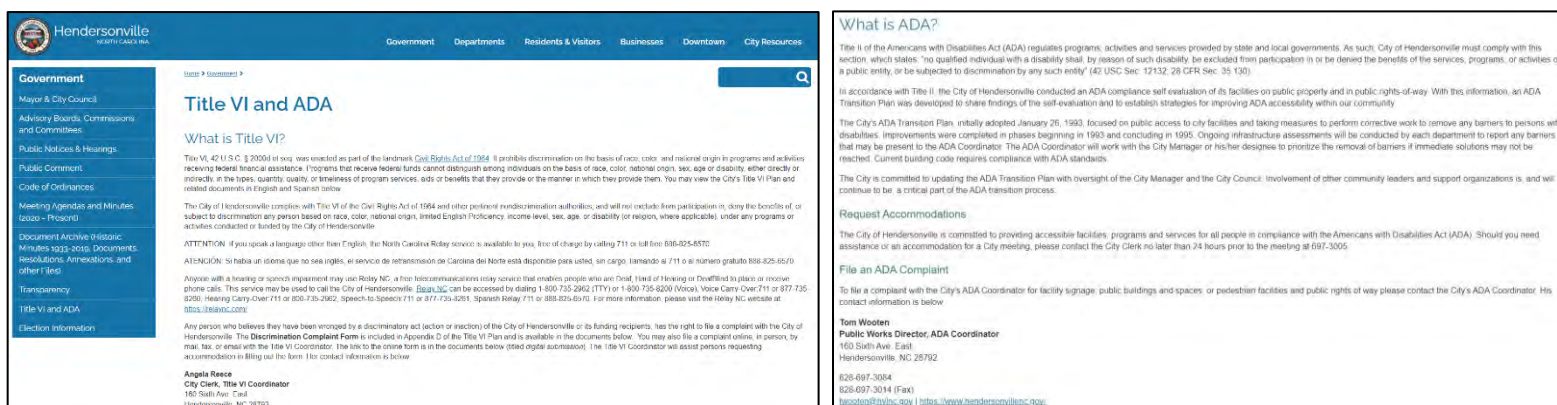


Figure 54: City of Hendersonville web page for Title VI and ADA

Source: <https://www.hendersonvilenc.gov/title-vi-and-ada>

Although its service area does not include Henderson County, Asheville Area Habitat for Humanity worked with Pisgah Legal Services, which does serve Henderson County, to produce a short film titled [This Divided Land](#). The film localizes the history of housing discrimination, initially through racial zoning and restrictive private deeds, and then in more formal, widespread use of government policy such as redlining (via the Federal Housing Administration’s Home Ownership Loan Corporation [HOLC]). This film provides an important template for Henderson County, notably in the use of deed research to document and mitigate historic racially restrictive deeds and covenants on property.

Examination of Public Policy and Programs

Federal & State Program Eligibility

Difficult Development Areas (DDAs) – Areas with high land, construction and utility costs relative to the area median income and are based on Fair Market Rents, income limits, the 2010 census counts, and Five-Year American Community Survey (ACS) data are considered Difficult Development Areas. They are important to LIHTC projects because they allow such projects to have higher construction costs than are normally allowable. Census Tract 9312 (downtown Hendersonville) contains higher than County-average minority and poverty-level populations, creating conditions that may support a Low-Income Housing Tax Credit (LIHTC) project at some point in the future.

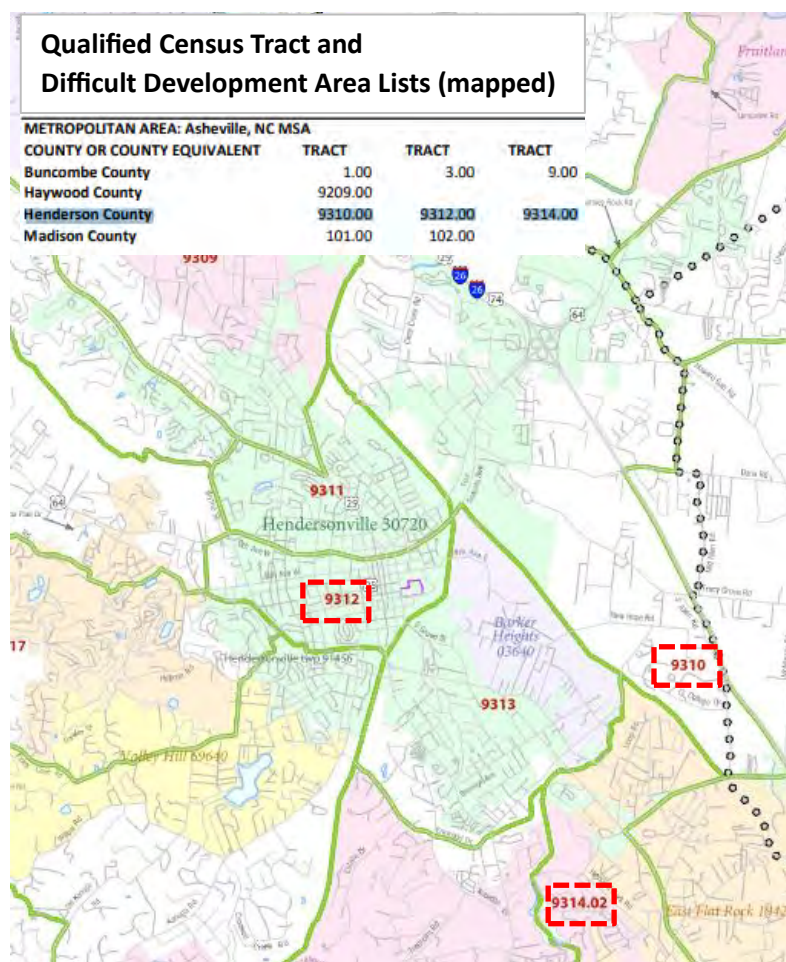


Figure 55: Qualified Census Tracts on Difficult Development Areas (DDAs) list

Source: https://www2.census.gov/geo/maps/DC2020/PL20/st37_nc/censustract_maps/c37089_henderson/DC20CT_C37089.pdf

Zoning Requirements That Have the Effect of Limiting the Availability of Rental Units

There are a wide range of policies that can affect housing affordability. Restrictive single-family zoning is currently being re-evaluated in several states and communities across the country, as this can limit the housing density and housing types that are needed to increase housing supply and lower costs.

Discretionary planning and zoning processes via Conditional Zoning (legislative review) and Special Use Permits and Variances (quasi-judicial review) are less predictable, for both developers and residents, than By-Right zoning (administrative review). The unpredictability of discretionary planning/zoning review generally translates to longer approval timelines and higher costs (i.e. higher permit fees, land use attorney and “expert witness” fees, lawsuits, etc.)

The City of Hendersonville’s zoning ordinance contains numerous by-right and conditional zoning districts. For the purposes of a limited-scope review, the table on the following page highlights the City’s by-right zoning districts for residential, commercial, and mixed-use districts. Dimensional requirements (i.e. min. lot size, min. lot width at building line) and use restrictions that are challenges to housing supply and housing affordability are summarized here and in the following table:

- **Supplementary Standards (SS) for Accessory Dwelling Units (ADUs):**
 - a) Accessory dwelling units may only be situated on a lot on which a principal residential dwelling unit is also situated and shall be clearly incidental or accessory to such principal residential structure.
 - b) No more than one accessory dwelling unit may be situated on any lot.
(NOTE: “Performance zoning” options could allow for more than one ADU per lot, indexed to larger lot size.)
 - c) Accessory dwelling units may not exceed 800 square feet of floor area.
(NOTE: 800 SF is equal to two (2) bedrooms. If the size limit was closer to 1,200 SF, this could allow 3-bedroom ADUs suitable for families or intergenerational households on one lot.)
- **Duplexes and Multi-Family require a larger min. lot size than Single-Family Detached Houses:**
This requirement potentially raises the per unit cost of housing rather than allowing more efficient use of minimum lot size. See illustrated examples for **R-10 and R-6 zoning** on following pages.
- **Multi-Family Attached Housing is not permitted in any of the residential-only districts.** This includes the R-6 High Density Residential district.
- **Manufactured Homes are not permitted in any by-right zoning district.** They are only allowed via PMH Planned Manufactured Housing Development Conditional Zoning District Classification, mapped on one 5.25 AC site out of 7.309 sq. mi. (4,678 AC), or 0.112% of city land area.

	R-40 Estate Residential District	R-20 Low-Density Residential District	R-15 Medium-Density Residential District	R-10 Medium-Density Residential District	R-6 High-Density Residential District	C-1 Central Business District	C-2 Secondary Business District	C-3 Highway Business District	C-4 Neighborhood Commercial District	CMU Central Mixed-Use District	GHMU Greenville Hwy. Mixed-Use District	HMU Highway Mixed-Use District	CHMU Commercial Hwy. Mixed-Use District
Accessory Dwelling Units (ADUs)	SS	SS	SS	SS	SS	SS	SS	SS	SS	P	P	P	P
Single-Family Detached House	P	P	P	P	P	P	P	P	P	P	P	P	P
Minimum Lot Area for Single-Family Detached Housing (SF)	40,000	20,000	15,000	10,000	6,000	n/a	6,000	6,000	40,000	8,000	n/a	n/a	n/a
Two-Family Duplex	n/a	P	P	P	P	P	P	P	n/a	P	P	P	P
Minimum Lot Area for Per Additional Dwelling Unit (SF) [i.e. R-20, 20,000 SF for Single-Family Detached House; 30,000 for Two-Family Duplex)	n/a	10,000	7,500	5,000	4,000	n/a	4,000	4,000	n/a	n/a	n/a	n/a	n/a
Multi-Family Attached	n/a	n/a	n/a	n/a	n/a	SS	SS	n/a	P	P	P	P	P
Manufactured Homes/Mobile Homes	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Min. Lot Width at Building Line (ft.) for Structures Containing Dwelling Units	150	100	85	75	50	85	50	50	n/a	n/a	50 (detached houses) 25 (alley houses) 16 (townhouses)	n/a	50
Max. Height (ft.)	35*	35*	35*	35*	35*	64**	48***	48***	35*	64**	35 (detached houses, alley houses) 42 (townhouses, multi-family housing)	2.5 stories (detached houses and alley houses) 3 stories (townhouses) 4 stories (multi-family housing)	2.5 stories (one, two-family dwellings) 3 stories (townhouses) 4 stories (multi-family housing)

Figure 56: City of Hendersonville, Zoning Districts including dimensional standards and use restrictions

SS = Permitted By-Right, w/ Supplementary Standards (SS)

P = Permitted By-Right

*35' only allows 3 stories; 40' would allow 4 stories

**64' allows 5 stories

***48' allows 4 stories; 50' would allow full-height ground-floor office/commercial (14-16' first floor) and residential above

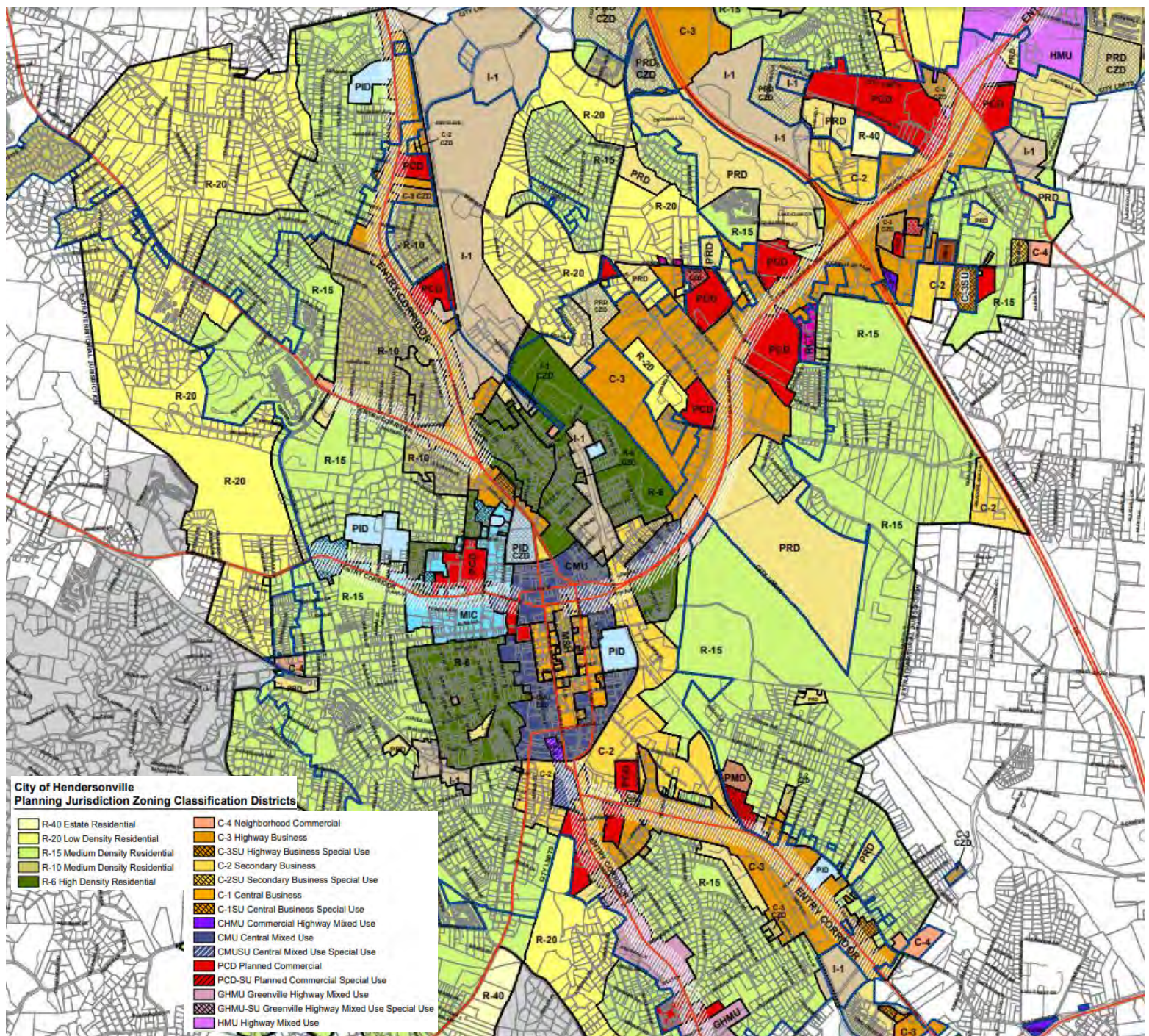


Figure 57: City of Hendersonville Official Zoning Map

Source: https://www.hendersonvillenc.gov/sites/default/files/uploads/official_printing_zoning_map_march_2022.pdf

Under a R-10 Medium-Density Residential zoning district, the figure below highlights potential design scenarios for a single-family detached house (on the 5,390 SF buildable area outlined in solid black line) and a duplex house (on the 2,695 SF buildable area outlined in dashed-line gray).

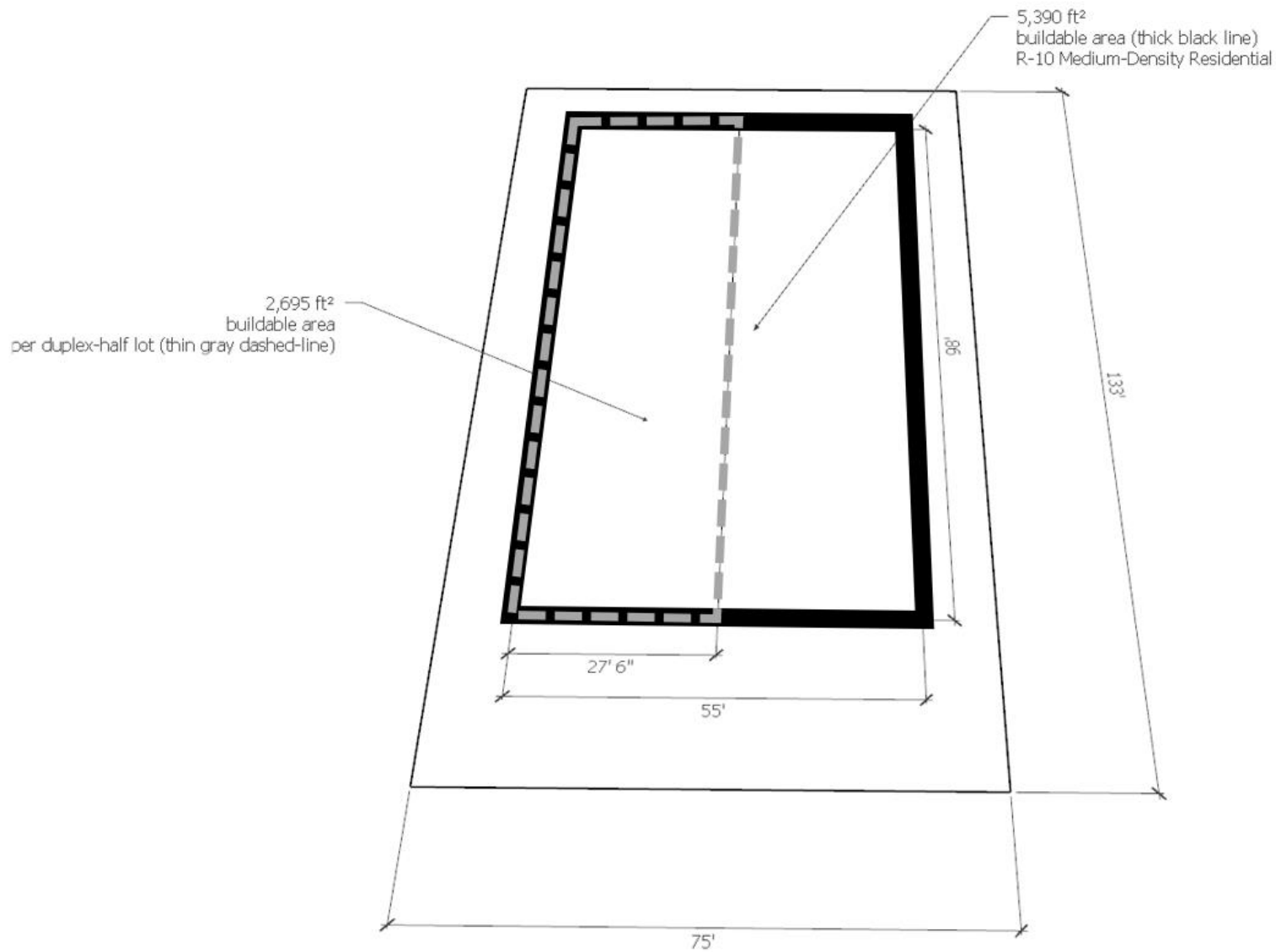


Figure 58: R-10 Medium-Density Min. Lot Size ($75' \times 133.33' = 10,000$ SF) and Min. Lot Width Requirement. Duplexes currently require an extra 5,000 SF (15,000 SF total), but as noted here, a duplex on a 10,000 SF lot could yield a 2,695 SF buildable area per half of a duplex.

Assuming a one-story build-out of two 1,155 SF homes (per half of duplex, see figure below), this scenario would still leave over half the buildable area open. This configuration could be built as condominium plat (i.e. two building on one larger lot) or as fee simple lots (the property line would run from front to back, with the duplex's partition wall running along the property line).

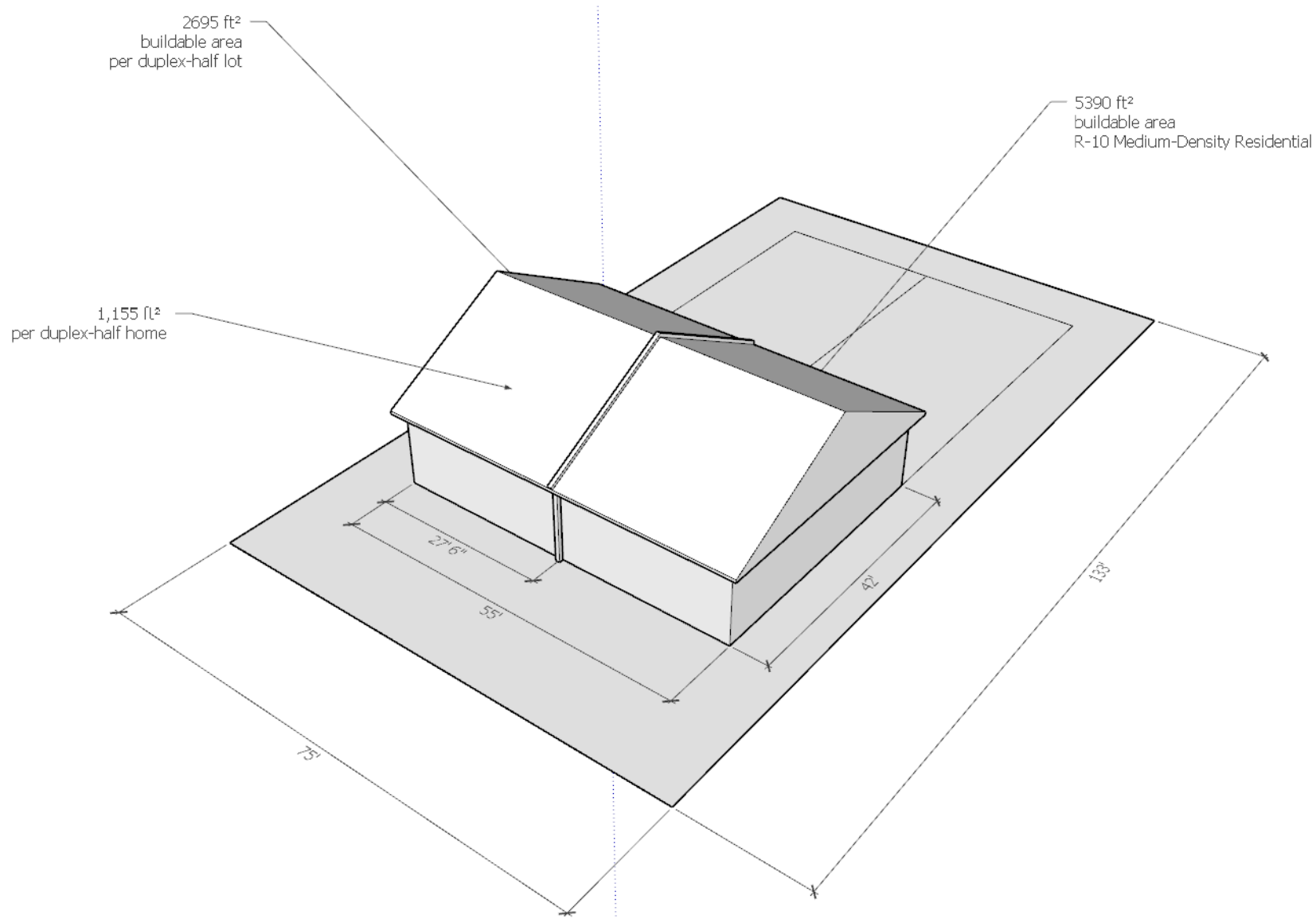


Figure 59: Design scenario showing two 1,155 SF duplex homes (2 bedroom, 2 bath) on a 10,000 SF lot. The current zoning ordinance requires a 15,000 SF lot for a duplex in the R-10 Medium-Density zoning district. Parking could be accommodated via a front-loading parking pad or garage, a rear alley-loaded parking pad or garage, or a driveway on either side that accesses a rear parking pad or garage.

Under an R-6 High-Density Residential zoning district, the figure below highlights potential design scenarios for a single-family detached house (on the 2,720 SF buildable area outlined in solid black line) and a duplex house (on the 1,360 SF buildable area outlined in dashed-line gray).

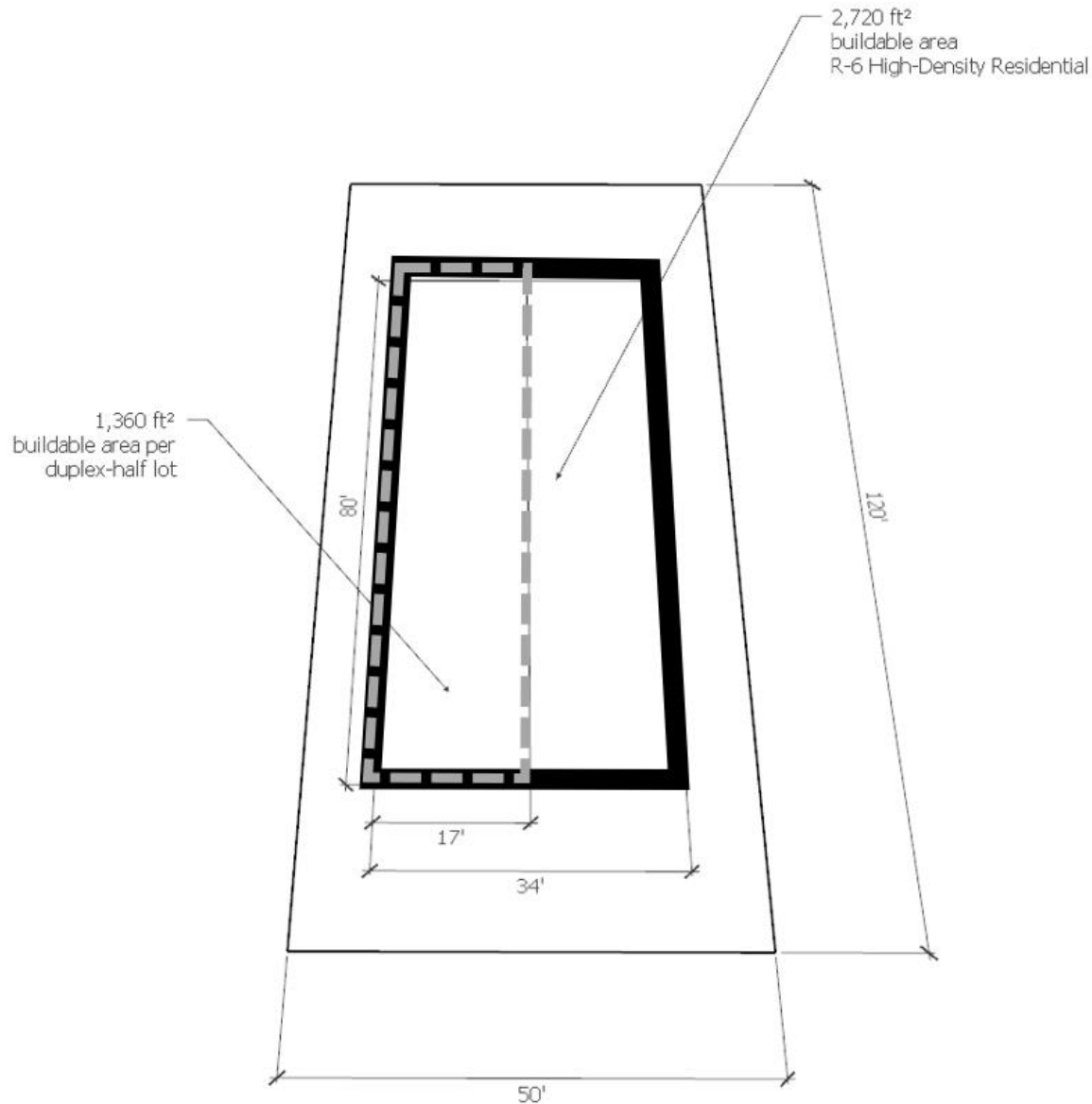


Figure 60: R-6 High-Density Min. Lot Size (50' x 120' = 6,000 SF) and Min. Lot Width Requirement.

Duplexes currently require an extra 4,000 SF (10,000 SF total), but as noted here, a duplex on a 6,000 SF lot could yield a 1,360 SF buildable area per half of a duplex.

Assuming a two-story build-out of two 1,224 SF homes (per half of duplex, see figure below), this scenario (34' wide x 36' deep duplex) would still leave over half the buildable area open. This configuration could be built as condominium plat (i.e. two building on one larger lot) or as fee simple lots (the property line would run from front to back, with the duplex's partition wall running along the property line).

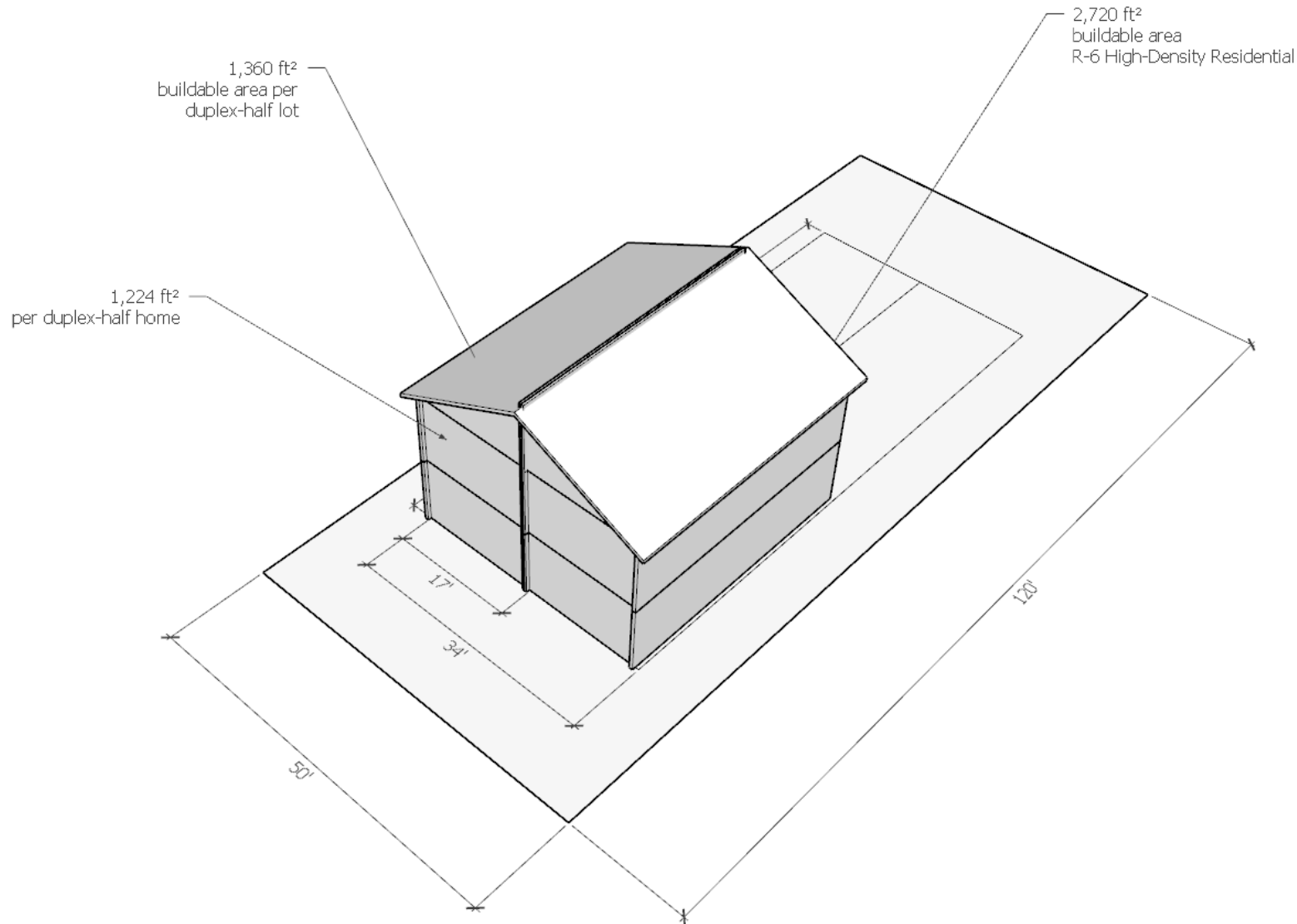


Figure 61: Design scenario showing two 1,224 SF duplex homes (2 bedroom, 2 bath) on a 6,000 SF lot. The current zoning ordinance requires a 10,000 SF lot for a duplex in the R-6 High-Density zoning district. Parking could be accommodated via a front-loading parking pad or garage, a rear alley-loaded parking pad or garage, or a driveway on either side that accesses a rear parking pad or garage.

Summary of Impediments and Recommendations

Based on the previous analysis, as well as stakeholder feedback, the following impediments to fair housing choice have been identified:

Impediment 1: Inadequate housing supply, both for-sale and rental

While market-rate housing supply has increased since the 2014 Bowen report, both the 2020 and 2021 Bowen housing needs assessments still found inadequate affordable housing supply in the rental and for-sale markets.

Limits on multi-family and manufactured housing and accessory dwelling units (ADUs) also limit affordable housing production. The Bowen HNA provides a detailed discussion of ADUs, but also notes that stakeholders who were surveyed prefer to see more focus on adaptive reuse, revitalization, new construction, mixed use, and housing along public transit corridors.

Recommendation:

Review zoning restrictions related to minimum lot sizes for duplexes and multi-family, to ADU size and quantity, and to housing typology in residential-only districts. Evaluate the potential for increased housing production with changes to zoning requirements, and conduct stakeholder outreach to ensure diverse perspectives and concerns are addressed.

Impediment 2: Inadequate supply of accessible housing options

The ratio of people with disabilities to available housing in Henderson County is 1:58 (1-person HH) or 1:29 (2-person HH). This coupled with the increased growth in households aged 65+ in Henderson County indicates that accessible housing supply needs to be increased.

Recommendation:

Continue to pursue funding for housing development and housing rehabilitation. Provide incentives to housing developers and providers to increase the number of accessible units in publicly funded housing developments or housing rehabilitation.

Impediment 3: Lack of housing finance options to achieve homeownership

HMDA data (2020) shows nearly 78% of loan applicants are white, and only 10% of these are denied. Black applicants only make up 1.48% of the total, and have a denial rate of 23%. Hispanic applicants are 2.79% of the total, and have a denial rate of 18%. The state's AI also addresses low levels of homeownership, especially among black and Hispanic households as an impediment, with higher mortgage denial rates as part of the issue.

Recommendation:

Assess the services available for homeownership counseling, especially for People of Color and low-moderate income households, and determine how their capacity and outreach can be increased. Evaluate the feasibility of a down-payment assistance program for low-moderate income households (see City of Asheville for an example).

Impediment 4: Discrimination based on source of rental income and previous eviction history

According to the 2020 Bowen Report there were 475 Housing Choice Vouchers issued in Henderson County, and an additional 458 households on the waitlist, with an annual turnover of 76 vouchers. However, stakeholders highlighted the difficulty in finding landlords willing to take vouchers, especially because the demand for market-rate housing is high, so the utilization rate is much lower.

Another issue that stakeholders highlighted it that if evicted, people are banned from public housing for five years, and also have difficulty in securing housing in the private market.

Recommendation:

Review local and national research on best practices and strategies to increase the number of landlords participating in voucher programs. In partnership with local non-profits, expand capacity to assist people who are facing eviction.

Impediment 5: Lack of transportation

While not addressed in the preceding analysis, stakeholders highlighted transportation access as a barrier to equal housing opportunity, with more affordable housing typically located in more rural areas in Henderson County. Henderson County operates the Apple Country Public Transit throughout Hendersonville, Fletcher and Laurel Park and works with service providers to meet community needs; however, the routes are fixed and the operating hours are limited (6:30am-6:30pm).

Recommendation:

Evaluate the feasibility of implementing microtransit – on-demand public transportation. The City of Wilson, NC piloted this approach in September 2020.

Impediment 6: Lack of awareness of fair housing laws

The low number of housing discrimination cases reported may be due to a lack of knowledge of fair housing rights and regulations. The state's Analysis of Impediments has identified education and outreach, particularly in rural areas and with limited English proficiency populations, as a priority.

Recommendation:

Increase fair housing training and outreach, both through community-wide education campaigns as well as targeted information for housing service providers and consumers. Provide materials in Spanish as well as English.

Signature Page

I certify that the Analysis of Impediments to Fair Housing Choice for the City of Hendersonville is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

John Connet, City Manager

Date