



ANALYSIS OF IMPEDIMENTS
to
FAIR HOUSING

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Introduction

Fair Housing Planning

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities like Gastonia, NC that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI). In an AI, grantees evaluate barriers to fair housing choice and develop strategies and actions to overcome identified impediments based on their histories, circumstances, and experiences. Through this process, communities promote fair housing choice for all persons, including classes protected under the Fair Housing Act, and promote racially and ethnically inclusive patterns of housing occupancy, identify structural and systematic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD presumes that a grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction.
- Promoting fair housing choice for all persons.
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to all persons to include those persons with disabilities.

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13). March 1996.

- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD's final rule, grantees must take actions to:

- Address disparities in housing need.
- Replace segregated living patterns with integrated and balanced living patterns.
- Transform racially / ethnically concentrated areas of poverty into areas of opportunity.
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees affirmatively further fair housing, HUD provided publicly available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In 2020, HUD further relaxed requirements to complete an AI, allowing grantees to instead certify that they are affirmatively furthering fair housing.

Mosaic Community Planning assisted the City of Gastonia with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows HUD's *Fair Housing Planning Guide* but also incorporates elements of HUD's assessment tool established in the 2015 final rule. In some places, it uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

Definitions

Affirmatively Further Fair Housing

To Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Affordable

Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners’ insurance, and any homeowners’ association fees.

Fair Housing Choice

In carrying out this Analysis of Impediments to Fair Housing Choice, the City of Gastonia used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or disability.

Impediments to Fair Housing Choice

As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

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

² U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing for Fair Housing Planning, Page 2-17). March 1996.

Protected Classes

The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Data Sources

Decennial Census Data

Data collected by the Decennial Census for 2020, 2010, and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- **2020, 2010, and 2000 Census Summary File 1 (SF1):** This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- **2000 Census Summary File 3 (SF3):** Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF3 dataset was discontinued for the 2010 Census, but many of the variables from SF3 are included in the American Community Survey.

American Community Survey (ACS)

The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately three million addresses rather than an actual count (like the Decennial Census’s SF1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- **ACS Multi-Year Estimates:** More current than Census 2020 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, five-year estimates will be more accurate (but less recent) than one-year estimates. The 2017 to 2021 ACS five-year estimates are used most often in this assessment.
- **HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T):** HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics

and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD's latest data and maps, AFFHT0006, which was released in July 2020. HUD's source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD's Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation, available online at:

<https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

Community Participation

Community Engagement Overview

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Gastonia and Gaston County. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including community workshops, stakeholder interviews, resident focus groups, and a community-wide survey.

Community Workshops

The City of Gastonia hosted virtual and in-person community workshops to understand issues of fair housing and access to opportunity. Each workshop began with a brief presentation that provided an overview of the Analysis of Impediments to Fair Housing Choice, the community engagement process, the project webpage and survey, the project timeline, and the types of analysis to be included in the study. The presentation was followed by an interactive discussion of fair housing and access to opportunity. One workshop was held virtually via Zoom—residents could join online or by phone—and one was held in-person at the City of Gastonia’s Adult Recreation Center. A total of 17 participants joined a community workshop. Workshop dates and times are shown below:

TABLE 1. COMMUNITY WORKSHOP DATES, TIMES, AND LOCATIONS

Community Workshop 1:	Wednesday, November 19, 2023; 1:00 p.m. (Virtual via Zoom)
Community Workshop 2:	Monday, December 11, 2023; 6:00 p.m. Adult Recreation Center 519 W Franklin Blvd, Gastonia, NC 28052

Stakeholder Interviews and Resident Focus Groups

The planning team also engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Discussion topics included barriers to fair housing, housing discrimination, access to opportunity, and fair housing resources. A total of 17 community stakeholders participated in a stakeholder interview, representing a range of viewpoints, including fair housing, affordable housing, community and economic development, education, public health, health services, food access, other public services, homelessness, housing and services for people with disabilities, other special needs housing, small businesses, public safety, real estate, substance abuse services, local government, domestic violence services, and others.

In addition to stakeholder interviews, the planning team engaged with residents through focus groups facilitated through B.R.E.A.D., Inc., a local food bank; Displaced Roses, a homelessness service organization; and the Gaston Association of Realtors. Focus groups included an interactive discussion of housing and community development needs and fair housing issues. Seventeen residents participated in a focus group.

Overall, one or more representatives from more than 20 organizations and agencies participated in a stakeholder interview, community input session, focus group, or written request for information. Organizations and agencies from which someone participated in the development of this AI include:

- Bread, Inc.
- Catherine’s House
- Community Development Citizens Advisory Board
- Disability Rights and Resources
- Displaced Roses
- Gaston Association of Realtors
- Gaston-Lincoln-Cleveland Continuum of Care
- Gaston-Cleveland-Lincoln Metropolitan Planning Organization
- Gastonia City Council
- Gastonia City Management
- Gastonia City Police Department
- Gastonia Housing and Community Engagement Department
- Gastonia Housing Authority
- HUD Greensboro Field Office
- Kintegra Health
- North Carolina Human Relations Commission
- Our Neighbors, Inc.
- Partners Health Management
- Phoenix Counseling Center
- Special Needs Community Initiative
- Webb Custom Kitchen

Community Survey

A final method for obtaining community input was a 23-question survey available to the public, including people living and/or working in Gastonia and Gaston County, and other stakeholders. The survey was available from November through December 2023 via an online link on the City’s Community Development Department website. Hard copies were available by request to the City of Gastonia Community Development Department. A total of 29 survey responses were received.

Public Comment Period and Public Hearing

The City of Gastonia held a 30-day public comment period to receive comments on the draft Analysis of Impediments to Fair Housing Choice from xx to xx, 2024. During that time, copies of the draft plans were available for public review on the City’s website, and residents and stakeholders could provide written comments. Residents and stakeholders could also mail or deliver written comments to the Community Development Department at 150 S. York Street, Gastonia, NC 28052,

or e-mail comments to info@mosaiccommunityplanning.com. The City received xx comments on the draft plans. The City held a public hearing on the draft plans on xx at xx. A summary of community engagement results is provided in the following section. Complete survey results and evidence of outreach materials are found in the appendix.

Publicity for Community Engagement Activities

Advertisement for the community workshops and survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Public notice of community input opportunities was given to residents through announcements on the City’s website and social media, newspaper articles, and e-mails to community stakeholders. Stakeholder interview invitations were sent to more than 70 contacts representing a variety of viewpoints including elected officials and staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services, workforce development organizations, and others. Meeting advertisements noted that accommodations (including translation, interpretation, or accessibility needs) were available if needed; no requests for accommodations were received.

FIGURE 1. ADVERTISEMENT FOR COMMUNITY WORKSHOPS

GASTONIA
NC
Great Place. Great People. Great Promise.

WHAT ARE YOUR
**HOUSING
NEEDS?**
YOUR INPUT IS CRUCIAL!

The City of Gastonia, NC is currently developing its Analysis of Impediments to Fair Housing Choice (AI), which will look at whether everyone has similar choices for housing regardless of their race, ethnicity, national origin, sex (including sexual orientation and gender identity), religion, disability, or whether they have children.

We need YOUR input! What are your neighborhood and housing needs?

<p>VIRTUAL MEETING Wednesday, November 29th 1 PM via Zoom Please pre-register @ https://tinyurl.com/29mb99yc</p>		<p>IN PERSON MEETING Monday, December 11th 6 PM @ Adult Recreation Center 519 W Franklin Blvd, Gastonia, NC 28052</p>
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Individuals requiring special accommodations at these public meetings should call the ADA Coordinator at (704) 866-6861 or (704) 866-6843 for TDD users within forty eight (48) hours of the meeting.

Register here for
the virtual meeting!

Visit the website:
tinyurl.com/yvzceukk

Community Engagement Results

Results from community workshops, stakeholder interviews, and focus groups are summarized below. All comments and surveys were accepted. Public input is summarized in this section, with complete survey results provided as an appendix. Please note that the comments below represent the community input received in the course of developing this plan and do not necessarily reflect the views of the City of Gastonia or Gaston County.

Stakeholder Interview, Community Workshop, and Focus Group Results

- 1. What types of housing needs are greatest in the community (e.g., workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?**

Support for development of affordable housing

- Growth from Charlotte is expanding into Gastonia and driving up prices past what historic residents can afford. Many are leaving and selling their homes because of the jumps in values.
- There is a lack of affordable housing in Gastonia. The county used to have affordable housing, but you don't find housing for rent at \$500, \$600, or \$700 per month anymore. Housing may cost up to \$1,800 for a one-bedroom, which is not affordable for someone making \$10 per hour. Rent in Belmont is \$1,400 for a one-bedroom. An individual would have to work 72 hours to afford housing, or double up with others.
- Since 2019, housing prices in North Carolina went up 50%. Housing for purchase used to be \$119,000 with 5% downpayment, but you can't find that anymore. Prices have gone up to \$400,000 to \$500,000. \$200,000 homes don't exist or need \$50,000 in repairs. You need \$135,000 in income to afford a home or to have two incomes.
- If homebuyers want to purchase more affordable housing, they have to look outside of Gastonia. Most residents looking to purchase housing in the \$250,000 - \$275,000 range have to look elsewhere.
- Seniors and young people are looking for housing they can afford- one-level houses in the low \$200,000s, about 1,200 square feet and 3 bedrooms. There is no housing at that price point.
- There is a need for affordable housing for seniors and single parents.
- A lack of affordable housing is causing residents to double up. Families with children are doubling up with seniors in senior housing developments.
- The county owns property that could be repurposed for affordable housing or to support small business development.

- Developers are not interested in developing affordable housing.
- The City could partner with developers to support housing development using Low-Income Housing Tax Credits (LIHTC) to develop properties in which a share of units must remain affordable.
- The City owns about 100 vacant lots in the Highland neighborhood that have been torn down. Those are opportunities to sell to affordable housing developers for development of affordable housing.
- There is a need for permanently affordable housing for households with incomes of 50% of the area median and below.
- An affordable housing trust fund could provide financial support for development of affordable housing.
- The City should fund affordable housing developers with a stake in the community.
- There should be stricter requirements for new developments to set aside units for low-income housing. All new developments should be required to set aside 5% - 10% of units for low-income residents

Implementation of City of Gastonia Affordable Housing Plan recommendations

1. In the study, there are eight recommendations that will serve as the City's roadmap. Some of the things the City is already doing, like rehab and homeowners assistance programs. Some other things it can hopefully put in place.

Diverse housing options and zoning to support them

- We, as a city, need to be more comfortable with more types of housing. People are used to seeing single family housing, but multifamily housing is important, where we could get 200 affordable units instead of one.
- There is a lack of multifamily housing.
- Tiny homes and co-housing options are a need.
- The zoning is changing. We've adopted a good number of ordinances focused on missing middle housing.

City support for development of smaller, more affordable housing types

1. Tiny homes are an opportunity to create affordable housing. SquareOne Villages in Oregon is an example of a successful model.
2. The greatest need is for small, one-bedroom units that are affordable.
3. Many seniors are trying to downsize, increasing demand for smaller, more affordable units.
4. The City of Gastonia has not been supportive of the development of tiny homes, creating a barrier to affordable housing development.

Education on importance of affordable housing and building community support

1. The biggest thing is education about affordable housing. We are all working and need a quality place to live.
2. The barrier or challenge with zoning is that to facilitate multifamily housing it requires a public hearing. When you have a multifamily development, you have neighbors turning out opposed to the housing. We have even seen it for senior housing. Anytime you have multifamily adjacent to single family, it's a challenge.
3. We have a development right now that's multifamily that will have 130-140 units that was opposed by the neighborhood.

Rehab/ repair programs

1. Funding for rehab/repair would be good to help people remain in their properties.

Access to affordable housing with supportive services for residents with disabilities

- Special populations always have unique needs. There are issues with having enough special needs housing available. Most have extremely limited resources and even more restricted housing choices. Gaston County has gone through their recent evaluation, and some units are sunsetting. One facility that housed individuals of lower income was sold, and those people were displaced. Most are on SSI, DI, or Social Security. They received around \$800 per month, so their rents were around \$500 per month. It would be difficult to place them.
- The problem is that there's not enough available and affordable housing for people with disabilities and family housing for people with disabilities (not just single units). There needs to be more building of subsidized units-more funding for a greater number of them, more funding to make them subsidized. More opportunities, more units.
- There is not enough accessible, affordable housing for people with disabilities of all ages. Of the housing that does exist, there are waitlists that people are on for many years. Some units may pass inspection but are not truly ADA accessible.
- There is a need for units that are accessible to needed resources and services. Existing units are not necessarily central to bus lines which is essential for people who are disabled. Units should be next to shopping, transit, etc.
- There is a need for set-asides in apartment complexes for seniors and people with disabilities.
- There are fewer than 10 group homes for residents with disabilities in Gastonia, and each can house up to 6 individuals.
- There is a need for development of affordable, income-based cohousing neighborhoods for residents with intellectual/ developmental disabilities to support shared supportive services, programming and activities, and community spaces.

- People with intellectual/ developmental disabilities may not be able to live in large apartment complexes where they don't know the people around them.

Access to affordable housing with supportive services for people with mental health/ substance abuse issues

1. There is a need for permanent supportive housing with wraparound services for people with mental health or substance abuse issues in a community environment. Charlotte has McCreesh Place and Moore Place that are community housing/ living. They are all together not scattered site. They have staff, counselors, social workers on site and a community room.

Assistance in accessing housing and resources

1. There is a need to let people know about the resources that are out there, including Housing Authority, City, and County resources. The City needs a one-stop-shop where residents can find out all the resources available for housing.
2. If residents have good credit, they may still need downpayment or closing cost assistance to purchase a home.
3. Households often have to pay two months' rent, security and utility deposits to get into housing, so it may cost \$4,000 or more up front to get into a unit.
4. There is a need for easy-entrance housing with weekly rents so that someone could save up \$500 and have a place to stay.
5. Immigrants and populations with Limited English Proficiency may require additional assistance in accessing housing. There has been a substantial Haitian migration to the community, and they have encountered some issues with obtaining rental housing. There have been more recent efforts to direct them to available services.
6. The City's downpayment assistance program exists but isn't helping people anymore because home prices have gone up so much. It is very difficult to meet requirements for purchasing a home as a single-income household.

Gap funding to support affordable housing development

1. Developers who build market rate and affordable housing are often looking for gap funding to make projects work because construction costs have increased considerably.

Publicly supported housing for residents of all ages

2. Public housing in Gastonia is only available for seniors aged 61 and over.
3. There is a waiting list for Housing Choice Vouchers of 500 to 600 households.
4. Lack of publicly supported housing and long waiting lists lead to increased homelessness.

Shared housing opportunities:

- Families sharing a home with enough bedrooms could be a model to support housing affordability.

Accessible transit and social services/ resources:

- Gastonia does not have a good public transit system. It is difficult for residents to get around without access to a vehicle. For many residents, it takes 20 minutes to get to a bus stop. A lack of transportation to employment is a barrier to accessing housing. Public transit covers only about 20% of the county. There are no connections between Gastonia and Charlotte or other communities, making it difficult for businesses to obtain employees. Buses go to the Amazon distribution center.
- Ridesharing services or smaller buses may be opportunities to reduce transportation costs and make transit more efficient.
- The cost of everything has increased post-Covid. Childcare is a critical need, and the assistance for everything is going up. Daycare is about \$210 per week and is going to increase again. A lack of affordable childcare is a barrier to employment, limiting housing choice.

Housing and services for people experiencing homelessness; community-wide education on homeless needs:

- There are homeless encampments across from the Eastridge mall, near the hospital, on exits from I-85, in Bessemer City, and in other locations. Camps may be hidden in the woods on private property.
- Folks who are unsheltered may be living in places not meant for habitation- a campsite, an abandoned building, a car, or just walking around all night, staying in one spot for an hour and moving again. The majority are using substances. They don't have benefits like SS or SSI. Even securing a job is not going to afford them enough money for an apartment.
- There is a need to understand what homelessness looks like and have an idea of what success in addressing homelessness would look like. Everyone thinks of tent encampments, but people may also be doubled up with relatives. There are homeless elementary school children. There are parts of the county that do not want to understand or address homelessness.
- There are people who need help with rent and are at risk of eviction, but there's no mechanism to assist them. There are thousands of people on the Section 8 waitlist, but there's no immediate form of help.
- A growing number of homeless residents receive SSI or disability payments, but they are not enough to cover rent anywhere anymore, so residents end up living in tents or in a car even though they have that income.
- COVID pushed a lot of people into homelessness who could've avoided it before.

- There are high levels of overcrowding/ doubling up, with up to 10 people in a two-bedroom house.
- Buses from other places drop homeless residents off at the mall.
- The City has a HOME-ARP grant. There is a lot of discussion about what they're going to do with the money. The plan approved by the government allows for renting or buying a hotel. That would allow for a continuum of care. If folks were in a transitional setting, they could continue to step to the next level. A lot of how to program the funding will depend on the homelessness prevention committee. One of the things that has risen to the top is folks who are unsheltered.
- There needs to be a one-stop-shop for people experiencing homelessness, food insecurity, and other needs in Gastonia. It is too difficult for people to track down and figure out how to apply for all the separate resources. Transportation should be available for to support residents in accessing these resources.
- Gastonia has a shelter, but it is high-barrier. Residents can't have a warrant, must pass a drug screen, and have to have an ID. Emergency shelter does not solve the problem of homelessness.
- The City shut down Pastor Moses' food and assistance for homeless residents because of drug issues.
- There is a need for temporary housing where individuals can have supportive services to be linked with employment, medical care, government benefits. Right now we don't have a place for folks to put a head on a bed so that their survival needs are being met. We have a handful of transitional homes, but they're specialized.
- There are racial and socioeconomic divides in homelessness.
- Tiny home communities with wraparound services such as employment training and transportation would be an opportunity to provide transitional housing to residents experiencing homelessness. Some tiny home communities have requirements for receiving drug or alcohol treatment and mental health services. In some tiny home communities, residents are the leadership and decision-makers for the community. Some communities are co-ops in which residents share a tiny home with four bedrooms. Savannah and Detroit are examples of cities that have used the tiny home model to support residents in transitioning from homelessness. Other examples exist in Oregon.
- Adaptive reuse of vacant buildings such as old factories could provide one-bedroom transitional housing units with wraparound services such as employment specialists and nurse practitioners, in which residents could stay for 18 months to two years while transitioning into permanent housing. Examples of this model can be found in Maryland and Delaware.

- Getting into an apartment requires two to three months' rent and security deposit. There is a need to support residents with deposits in getting into permanent housing or break up the deposit over 12 months to make housing more accessible.

Homelessness prevention

1. A lot of people are in need of rent or utility assistance. There were resources with COVID but since that time the resources are drying up, and organizations do not have the same capacity.

Voucher acceptance:

- Landlords do not want to accept Housing Choice Vouchers because of the stigma.
- Units are in poor condition, and landlords know that if repairs aren't completed in 30 days, they will not get paid through the HCV program.
- The HCV program has unreasonable inspections. They give 24 hours to make repairs. Landlords can rent on the private market for \$400 more per month.
- There are issues with tenants trashing houses.

Financial education:

- Financial education is needed to prevent homelessness.
- Financial literacy should be taught in 11th to 12th grade or earlier. There is a push to partner with high schools to provide financial literacy courses.

Eviction/ legal assistance

1. Many people don't receive counsel when being illegally evicted. Landlords may evict people illegally and assume they won't receive pushback.

Addressing investors purchasing large numbers of properties:

1. The market has been saturated by investors buying up properties, doing a tiny bit of remodeling, and then selling for twice the price.
2. 25% of homes in the Charlotte Metropolitan Statistical Area are owned by investors.
3. Investors have come into the market with large downpayments and pay more because they want to control the market. Most of them rent or flip the properties.
4. DRB Homes is delivering 900 homes this year, and 800 of those are to investors. Only 100 are to the public. There are no laws against it as long as they're within zoning guidelines.

Addressing monopoly of large apartment companies:

1. Apartment companies own 80% of Gastonia's rentals. There are few private landlords. One property manager may own 15 buildings.

2. The requirements to get into the apartment complexes are high. Rent may be \$1,700, and households have to earn three times that in income. Individuals would need to earn \$60,000 per year in income to get into housing.
3. Applicants have to pay fees per adults living in the home and could end up spending hundreds of dollars in application fees. There is a need to consolidate the application process so that residents don't end up paying that much to apply for housing.

Increased focus on reducing and addressing impacts of gentrification

1. The development of the FUSE District has led to gentrification in the neighborhood.
2. When the City built the stadium, it took people's homes and demolished the housing in the area.
3. Recent rapid increase in property values is displacing some seniors with limited incomes due to property tax increases
4. The stadium has driven up property taxes, and seniors on fixed incomes are worried about losing their homes.
5. The City should increase its focus on housing affordability rather than demolishing housing for large development projects like the stadium.
6. Gastonia is unable to offer seniors exemptions or decreases in property taxes on a local level, but there may be tax help at the state level.

Expanded living wage job opportunities/ economic development to support residents in accessing housing

7. Salaries have not kept up with rent increases.
8. Gastonia was a textile mill town in the 1960s and 1970s. Many former workers are at a disadvantage due to lack of education.
9. There is a need higher-paying jobs to keep up with increasing cost of housing. Rent for a one-bedroom unit is \$1,400 on average in Gaston County and that isn't reasonable for a one-income household.
10. WIX, Freightliner, and Stabilus provide high-paying jobs in the area, but many other jobs in the city do not pay a living wage, making it difficult for residents to afford housing.
11. As long as there is a \$7.25 minimum wage, housing will be unaffordable.
12. Gastonia lost generations of textile industry and has not recovered those jobs.
13. There is a need to take advantage of the Opportunity Zones in Gastonia to bring in long-term businesses.
14. There is a need to allocate funding for job and skills training, including for trades.

Expansion of fair housing resources/ services and increased awareness of available programs and resources:

- There is a need to increase visibility of strategies and programs to address housing needs and homelessness using a variety of methods, including through churches and having volunteers knock on doors.
- The City of Gastonia Affordable Housing Plan identified a need for a one-stop shop for resources and programs related to housing.
- The City has programs such as downpayment assistance, but some residents may think these programs are too good to be true or not for them. People think they need to have everything together before accessing the available programs, but the programs are there to support them in getting their financial life together.
- Transportation to classes could reduce barriers to access.
- There is a need to promote success stories of financial education and residents accessing housing or purchasing homes.
- Bank of America is giving \$27,000 in downpayment assistance, but people aren't aware of the program. NC Housing has a \$50,000 pool of money that can be used to reduce housing costs for qualifying buyers. Homes must meet certain requirements.

2. What parts of the city are generally seen as areas of opportunity (i.e., places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- In Gastonia, areas of opportunity include the southeast portion of the city because there is better access to amenities, like grocery stores and higher-ranking schools. Within Gaston County, the eastern portion of the county has better access to schools, transportation, and jobs.
- East Gastonia is a desirable area. It has better schools and is closest to Charlotte. The historic district is especially desirable. There are many multi-generational families wanting to live where they grew up. The area has good schools, feels safe, and has more grocery stores, restaurants, etc.
- Areas closer to Charlotte are seen as areas of opportunity, but they can be more expensive. Residents living in these areas have shorter commutes to employment in Charlotte. Living in Gastonia is more affordable than living in Charlotte.
- Many people used to not want to live on the west side of Gastonia, but redevelopment is making it more desirable despite economic challenges. The east side is so full that many people are now willing to move west.
- For access to high-quality schools, residents want to live in the Robinwood area, South Gastonia, or Belmont. Charter schools are available, but you have to provide your own transportation.

- The City invested a lot of money in the FUSE District and built a minor league baseball stadium near downtown. A lot of shops in downtown Gastonia closed so the City built the stadium to increase interest in the area. There are apartments going up, but they're all market rate so not affordable.
- The South New Hope Road area has lots of new businesses and stores, including a new Publix.
- In the county where developers are building is very close to being able to commute to Charlotte, or the other side of the county, closer to Lincolnton.
- In the county as a whole, Mount Holly and Belmont are growing quickly. Proximity to Charlotte is important. Growth is mainly happening in the cities because of access to water and sewer that allows for more development.
- In Gastonia, there has been lots of growth on the southeastern side of the city, closer to Charlotte. That's where it's primarily single family, not a lot of multifamily. There is a brand-new YMCA facility and higher-end commercial, higher-end grocery stores like Harris Teeter and Publix.
- Belmont and east Gaston County have nice restaurants, fun activities, and a park.
- Mount Holly, Cramerton, and McAdenville have the Catawba River nearby and the opportunity to enjoy nature. The rents have gone up significantly. Residents wouldn't be able to live there unless they're making significant amounts of money, and none of those areas have public transportation.
- Uptown Gastonia is an area of opportunity.
- We have a couple neighborhoods in Gastonia that have concentrated on supporting folks in purchasing a home and having help to do that. Our Highland neighborhood has grown leaps and bounds in trying to get affordable housing. Their struggle is developers flipping and selling for an amount that isn't affordable. Highland has done a wonderful job with renovations and funding. The community has a significant degree of ownership. They have an association that is well-founded and does a good deal of work, the Highland Neighborhood Association. It's taken a lot of work. Those are the types of things the city and county need. The Highland neighborhood was an extremely low income neighborhood for years. It had pretty high crime and unemployment but that has really changed. They still have issues like any neighborhood, but it is a place where people would want to buy if they could get the assistance they need.
- The Highland neighborhood has residents with mixed incomes and a mixture of housing types in one neighborhood. It's growing into a unified mixture of different cultures. There are homes that are \$80,000 - \$90,000 and in the \$200,000s, as well as apartments.
- The Highland area has a technology school and the stadium, which increase residents' desire to live there, but the City should be mindful of gentrification. Highland has great opportunity with the blue line that will be coming through the area. All kinds of housing are

being built there. Vacant lots are \$250,000 to \$300,000. Developers started building one-level houses at \$175,000, and four to five years later they are selling at \$350,000.

- The west side and north part of Gastonia have had the greatest challenges in terms of new housing. But there have been proposals on the west side going through rezoning for development. The city is leasing 140 acres on the west side as a park, Linwood Springs Park, and that is driving development. There are development proposals adjacent to that park, and the city is starting to see development proposals for single-family and multifamily on the west and north side. The City owns a lot of property on the northern side of the city in the Highland neighborhood, bisected by US-321.
- Gardner Park is central and within minutes of everything in Gastonia. The school districts are changing. Real estate has almost doubled in the past few years.
- East of 321/ East Gastonia is a popular area.
- Franklin Square has jobs but no affordable housing and no public transportation. Many of the businesses there want to hire. Townhomes are being built there that sell for \$300,000 to \$400,000.
- The northwest and southwest corners have fewer amenities. Several areas in the northwest are food deserts. Transit may not be available to those sectors. There are not as many retail establishments to meet basic needs. The Highland community is one that is considered a food desert. The northwest has a Walmart, but that is pretty much the only food establishment. Residents are limited in options.
- West End has great potential with Kings Mountain.
- South Gastonia does not have many grocery stores or retail options. You would need to live near a bus stop to get to one. Access to public transportation is low so residents need cars to get around. There is no bus line.
- Cherryville lacks economic activity. It has a Walmart and Dollar General.
- The area around Belvedere and Franklin is a food desert. The closest grocery store is Food Lion, so people end up shopping at Dollar General.
- Gastonia had a moratorium on low-income/ subsidized housing on the west side because it was overloaded with it.

Barriers to moving to these areas include higher costs of housing, lack of access to wealth to purchase a home, lack of public transit to access employment, NIMBYism and opposition to affordable housing, lack of housing supply, and lack of access to healthy food in some areas.

**3. Do residents of similar incomes generally have the same range of housing options?
Are there any barriers other than income/savings that might impact housing choices?
Are you aware of any housing discrimination?**

Residents and stakeholders noted several barriers to housing choice other than income or savings, including:

- The number of people in a household
- Households' financial responsibilities
- Race coupled with credit score
- A lack of housing at different price points and lack of variety of types of housing in Gastonia
- The quality of available housing under \$250,000
- Lack of supply of housing under \$300,000
- Lack of smaller, more affordable housing units
- Less available housing in rural areas
- Lack of larger housing units to accommodate large families
- Limited availability of transportation
- Distance of housing to location of employment
- Limited workforce housing available in downtown Gastonia
- Discrimination against people with disabilities
- Difficulty finding housing for residents with criminal histories
- Landlords not accepting Housing Choice Vouchers. Many residents with vouchers are unable to use them. There are issues with Fair Market Value – landlords can price higher when they don't accept vouchers and still have demand.
- Intimidation by landlords to evict residents without actually filing paperwork
- Lack of knowledge of fair housing rights
- LIHTC projects tend to discriminate against residents with SSI or SSDI as their source of income.
- Utility deposit amounts are based on a risk analysis, so someone with a worse credit history or history of eviction would have a higher deposit.
- Lack of funds available for security deposit, first month's rent, or downpayment
- Lack of employment
- Impacts of generations of discrimination on people of color
- Inequities in homeownership between Black and white residents, which affect the ability to build wealth
- Perceptions of neighborhoods that impact whether residents want to live in different areas
- Immigrant status, which impacts where people may feel welcome. Haitian refugees in the area are having difficulty getting connected to housing and other resources due to stigma against immigrants.

- LGBTQ+ residents have reported micro-discrimination and feeling unwelcome when searching for somewhere to live.
- HOAs may lobby for removing residents from a community or turn away someone's application.
- Steering by real estate agents
- Investors purchasing large numbers of housing units and offering high downpayments
- Lack of trust in the banking system among Latino residents; lack of bank account and credit history
- Lack of a consolidated application system and high application fees for rental housing
- Some homeowners will only sell their home to someone they know.
- Age limits in publicly supported housing properties
- Discrimination based on race
- Some neighborhoods can be unwelcoming to residents of different races and ethnicities
- Lack of parking spaces or working elevators for residents with disabilities
- Need for more support and wraparound services for previously homeless residents to re-enter stability and learn to live independently

Most residents and stakeholders were not aware of any discrimination, but some focus group participants indicated that it may happen quietly when property owners may turn down applicants based on protected class status and the applicants are unaware.

4. Are people in the area segregated in where they live? If so, what causes this segregation to occur?

Residents and other stakeholders emphasized the following issues related to segregation and integration:

- Segregation is income-based. Segregated areas have been shaped by ongoing housing inequality over time. There are pockets that are more affordable, and people who make lower incomes generally live in those areas. Incomes can be impacted by intergenerational inequality. It's really economic, what you're able to afford. People don't get the opportunity to live where they want because of availability and affordability. Outskirts and rural areas are more affordable.
- There is segregation across the county. Part of it is generational. There is at times the sense from folks that 'no, they're not coming into my neighborhood,' whether referring to Haitian residents, African American residents, or young people. It's getting better, but that's going to take time.
- Many people move into the area from Charlotte, and those people regardless of race/ethnicity tend to be higher-income. Because so many new people are always moving in there is less anti-outsider sentiment.

- Some segregation is due to homes passing from generation to generation.
- Some clustering results from people who were born and raised in certain neighborhoods staying there multi generationally.
- The housing market has created more diverse communities. The Highland community now has white neighbors.
- The Highland neighborhood was an African-American neighborhood for decades and was known as high-poverty. Now, it's becoming a mixed neighborhood, but that took a lot of work. They built a large public high school in the neighborhood, a special school where students can major in healthcare. Admission is based on a lottery. It said a lot to a lot of people that the County was willing to put a public high school in the neighborhood, and the areas that fed it would not be unique to the Highland neighborhood.
- Gastonia has certain neighborhoods with more minority populations than others. The northern part of the city has a larger minority population of African American and Latinx community members. Some neighborhoods are historically African American. Those are in the northwest and southwest areas and are typically lower-income areas.
- There are people who don't want to be around people who don't look like them. It's not something we should accept or affirm, but it's a reality.
- Not having transportation is a cause of segregation because it limits access to jobs that would allow people to live in other areas.
- There are many landlords in some areas who won't accept vouchers, which contributes to segregation.
- Public housing and poorer neighborhoods are more racially segregated, creating clustering of populations of color.
- The area has a growing Hispanic population. There is one apartment complex in which the office staff and property management team are bilingual and so the population in that complex is disproportionately Hispanic/Latino.
- Senior housing developments are frequently in low-income communities of color.
- Previous redlining and other segregation efforts contribute to current segregation patterns.

5. Are public resources (e.g., parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in Gastonia and Gaston County?

Stakeholders noted some disparities in access to and quality of public and other resources in the city and county, including:

Transportation Access

1. The lack of public transportation in Gaston County is a major challenge, particularly in rural areas. Residents would need to live in Gastonia or Charlotte to get around without a vehicle. There are only certain corridors in Gastonia served by public transportation.

2. East and southeast Gastonia have less of a need for public transit because residents tend to have access to vehicles, while areas that need transit, such as the north and west side don't have it, making employment challenging.
3. Transportation is an issue especially in the Highland area.
4. Residents in areas such as Cherryville and Dallas do not have access to public transit.
5. The City is currently transitioning away from buses and towards City-sponsored micro transit, similar to Uber/Lyft.
6. Current bus hours aren't ideal for workers with jobs outside of 9-5 hours. The bus doesn't run later hours. A lot of manufacturing or start up jobs are first shift or third shift.
7. Bus stops may be ½ mile away and that is a long way when the weather is bad.
8. Newer neighborhoods are being built without sidewalks. The sidewalks within the city are often covered with leaves, making walking more difficult. If there was more cooperation in keeping the sidewalks cleared, you might have more walkability in the older neighborhoods.

Education

1. School quality tends to be better in the southeastern part of Gastonia.
2. There are schools in more tragic circumstances than others. The schools east of downtown are safer. There are schools where it's harder to have a controlled classroom. There are some schools teachers don't want to teach at.
3. There are things like PTA – if you have 15-20 parents working to improve the school, have barbeque or candy sales. The places those happen well are places the parents donate more to the classroom, and teachers don't have to buy the Kleenex. More money is put into the schools by the community.
4. York Chester Middle School is south of downtown, and part of that area has been gentrified. People have bought nice, big homes and updated them. But the middle school is one of the lowest performing. Everyone who can sends their kids to private schools. The school doesn't have the support of the community, even though there are big houses around it. It may be integrated with Career Academy because it's not a good educational environment.
5. The schools with 75% single-parent households tend to be more troubled schools, and those schools haven't had improvements done in many years. In the suburbs, 75% of students come from two-parent homes.
6. The School Board does a good job of trying to spread talent.
7. Residents may try to send their children to charter schools or magnet schools because they don't like the school in their area.
8. Most of the high schools have a lottery-based track, but they also have typical high school admission by school zone as well. If a student wanted to go to Highland and do the

healthcare track, they would do the lottery, but if you lived within the attendance lines they could participate in the non-specialized track.

9. The district has built one or two new schools. The planning has been pretty extensive to try to see into the future, but building schools takes forever. Sometimes kids have to travel outside of their neighborhoods to attend school because the district can't build schools fast enough.

Healthcare

1. The two hospital systems have done a good job of building locations across neighborhoods. Primary care or specialists aren't far from residents regardless of where they live. The problem is we don't have good public transportation to access healthcare. Gastonia has the best system. Residents in Belmont without Medicaid can't get transportation. That needs to be looked at because outside of Gastonia, that piece of infrastructure is not there.
2. CaroMont is the big player in hospitals and has expanded in past years. They have free-standing emergency rooms and have tried to keep up with demand. The area has a lot of primary care doctors. The issue is with folks who don't have health insurance. The systems in place for those folks get taxed and have trouble keeping up because there's only so many people they can see.

Parks

3. City has been working to expand parks and recreation into low-income areas over the past five years.
4. The city is reasonably equitable as far as parks. It has used American Rescue Plan funds to close that gap. With the development of the new park on the west side, Gastonia has made significant progress. The City appropriated almost \$2 million of ARPA funds to improve the community center in the Highland area. On the west side, the Linwood Springs Park is being developed.

Services, retail, and grocery stores

5. There is a great need for investment in jobs in north and west Gastonia.
6. Generally, the north side of Gastonia, particularly the Highland community, has been a food desert.
7. Low-income areas have fewer restaurants and less shopping.
8. The Highland community came up with R.A.M.S. Kitchen, a mobile food kitchen source that provides \$5 plates of healthy food.
9. There's only one little downtown area of Gastonia, but affordable housing isn't near that. So people who live away from that don't get to benefit from that area. There is not much affordable housing- it's located more than 10 miles from the county seat.

First responders

1. In Gastonia, first responders are evenly distributed. The City makes sure there is one fire service in each ward. In the rural areas, there is usually a volunteer service.
2. Staffing levels among first responders are perilous right now.
3. Gastonia does annexation, so officers may drive through the county for almost 20 minutes to get back in the city to answer a call. I don't think when people bought their homes they thought that first responders would be 30 minutes away. Ambulances are run by the County, but they don't have enough substations to have their response time as fast as they would like it to be.

6. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area?

Stakeholders noted several fair housing services in the area, including:

- The City of Gastonia provides fair housing classes, has a HUD fair housing compliance officer, and a dedicated phone number for residents who believe there has been a fair housing issue. It also provides information and resources through its downpayment assistance program. The City offers training for real estate agents, lenders, and residents on fair housing, and has partnered with afterschool programs to offer activities during Fair Housing Week. The City refers fair housing calls to Legal Aid of North Carolina or other appropriate resources. The City has brochures available in English and Spanish.
- The only fair housing testing available is through Legal Aid of North Carolina, which receives funding from HUD to do testing. Legal Aid of North Carolina also has a department that addresses landlord-tenant disputes. Residents can appeal decisions regarding eligibility or nonpayment.
- The North Carolina Housing Finance Agency offers fair housing training.
- The Mediation Center of the Southern Piedmont also addresses landlord-tenant disputes.
- Realtors who are familiar with fair housing laws can provide residents with information.
- There are classes available through Partners Health Management through the Continuum of Care about fair housing when it comes to requesting accommodations. They have been well-communicated and easy to access.
- The NC Human Relations Commission accepts fair housing complaints and investigates those complaints.
- HUD testers are out in Gaston County. They make phone calls and do show-ups at properties and ask about the housing.
- The City of Gastonia partners with Habitat for Humanity, North Carolina Legal Aid, and Gaston County to offer fair housing training.

- Disability Rights and Resources directs residents to the fair housing unit for their county and provides information on how to file a complaint if they have been discriminated against.

Opportunities for further expanding fair housing services include:

1. There is a need for additional Spanish language fair housing services and outreach.
2. More fair housing education is needed. There is a need for additional training on how to purchase a home.
3. The City could partner with the Gaston Association of Realtors during fair housing month.
4. The City could run advertising about fair housing hotlines, discrimination resources, and landlord education.
5. The City could include information on fair housing education opportunities in utility statements.
6. The City could put up banners for fair housing month.
7. The City could help facilitate a platform of information on fair housing resources and housing programs.
8. The City could require landlords receiving income from rental properties to take fair housing education classes.

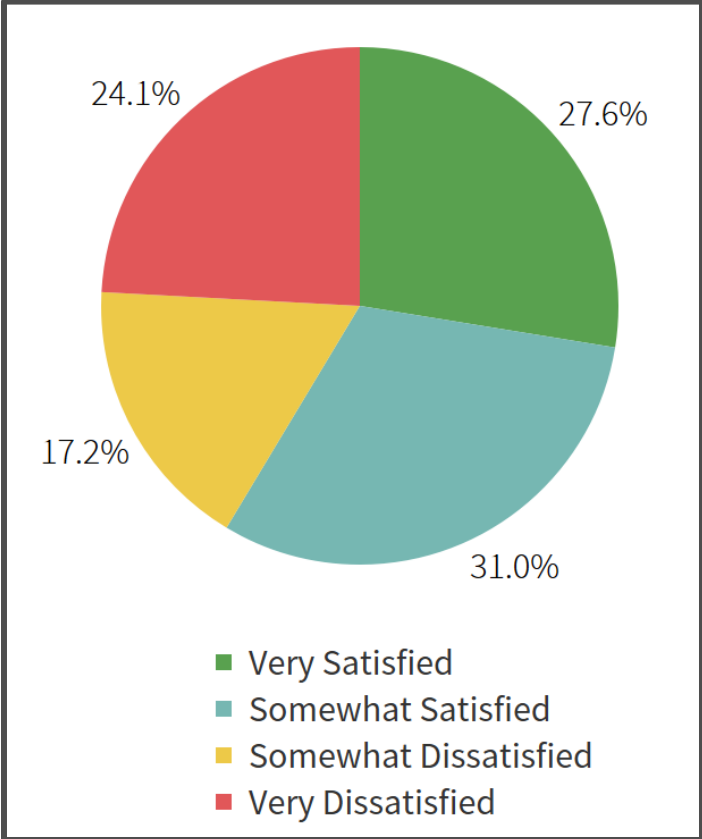
Community Survey Results

The community survey asked residents and stakeholders about barriers to neighborhood resources, affordable housing, provision of public services, and fair housing access in the city and county. A total of 29 people responded to the survey, representing a range of age groups, income levels, races and ethnicities, and zip codes.

Respondents' Thoughts about Their Neighborhoods

When asked how satisfied they were with the neighborhood they live in, most respondents were somewhat satisfied (31.0%) or very satisfied (27.6%) (See Figure 2). Around 17.2% of respondents were somewhat dissatisfied and 24.1% noted they were very dissatisfied with the neighborhood they live in.

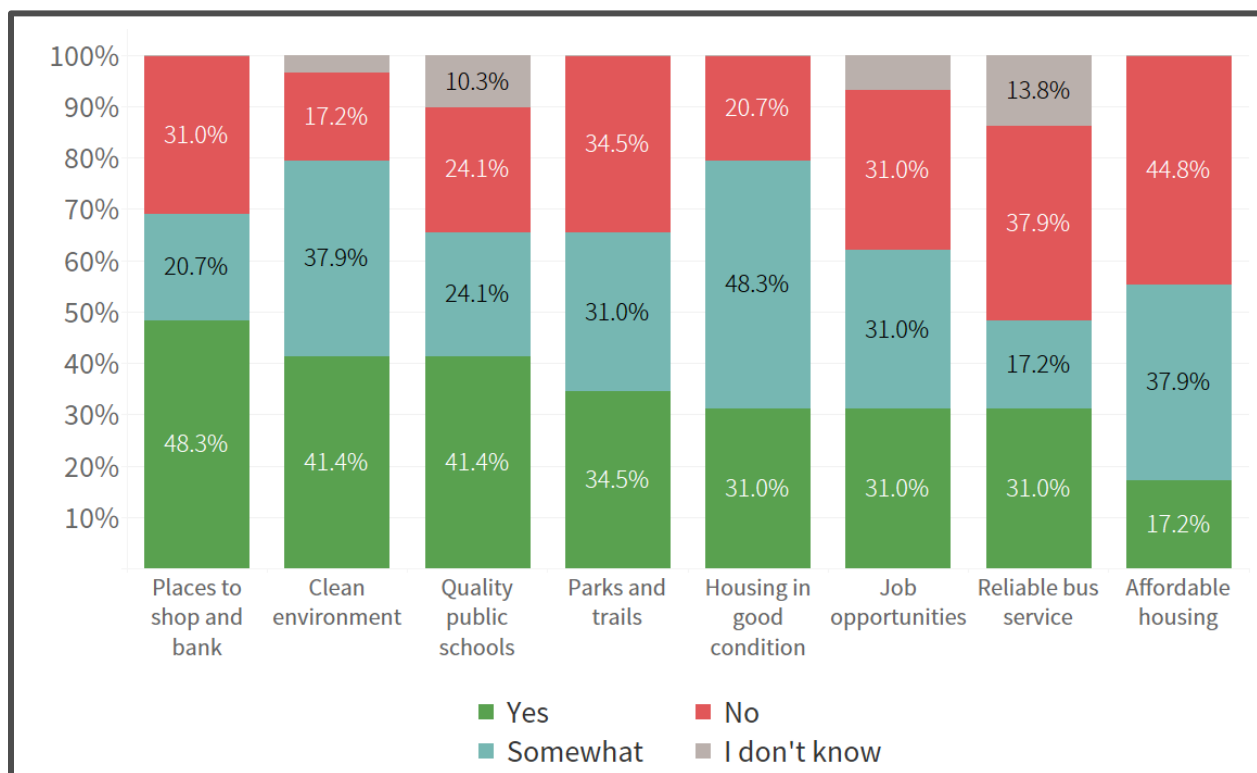
FIGURE 2. HOW SATISFIED ARE YOU WITH THE NEIGHBORHOOD WHERE YOU LIVE?



When asked about the distribution of community resources in their neighborhoods (See Figure 3), respondents noted the following:

1. The top three resources residents have access to include: places to shop and bank (48.3%), a clean environment (41.4%), and quality public schools (41.4%).
2. The top three resources respondents somewhat have access to include: housing in good condition (48.3%), affordable housing (37.9%), and a clean environment (37.9%).
3. The top four resources respondents do not have access to include: affordable housing (44.8%), reliable bus service (37.9%), job opportunities (31.0%), and places to shop and bank (31.0%).

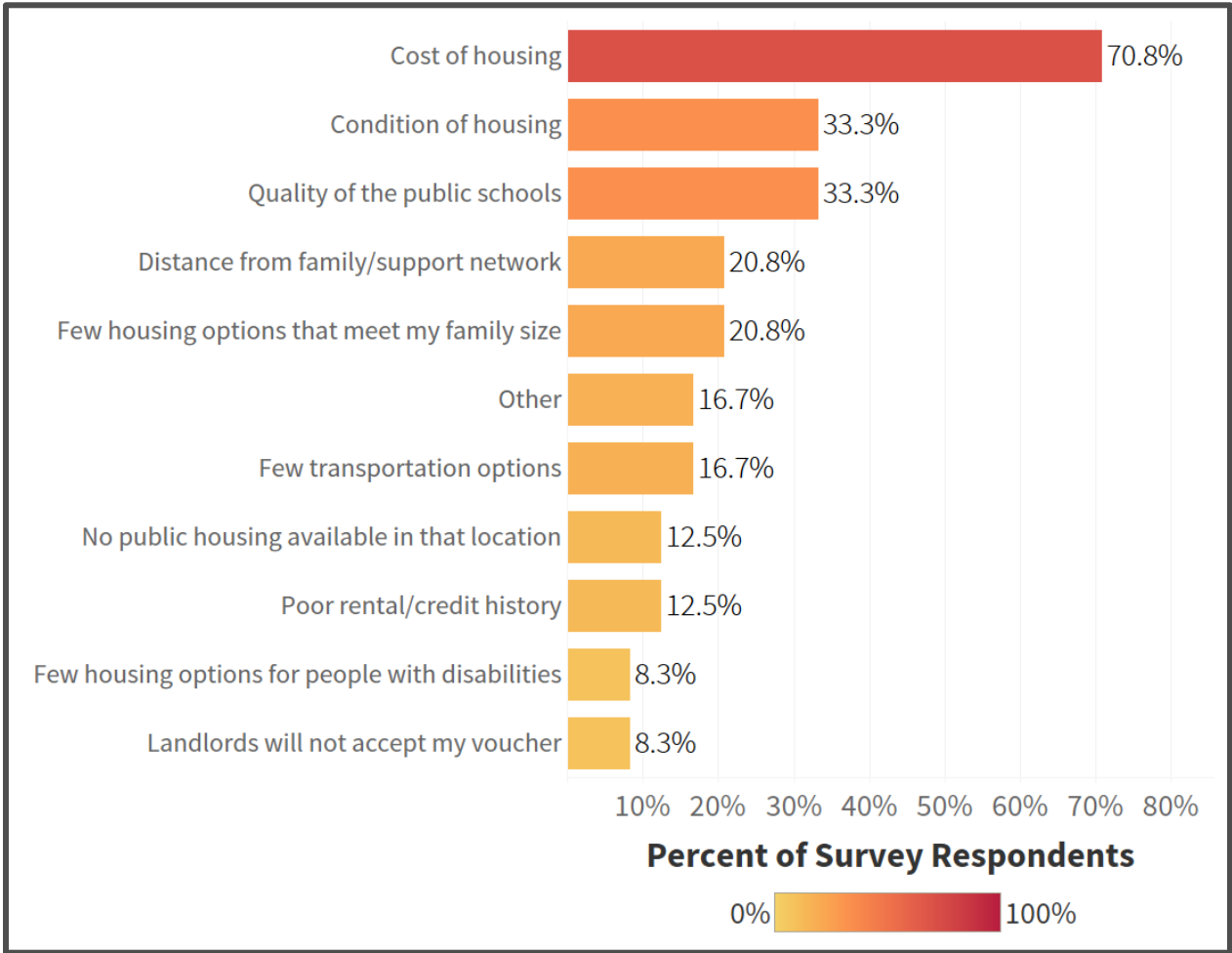
FIGURE 3. DO YOU HAVE ACCESS TO FOLLOWING COMMUNITY RESOURCES IN YOUR NEIGHBORHOOD?



When asked if they wished to live closer to their workplace (See Figure 4), respondents indicated that the primary barriers preventing them from doing so include:

1. Cost of housing (70.8%)
2. Condition of housing (33.3%)
3. Quality of public schools (33.3%)

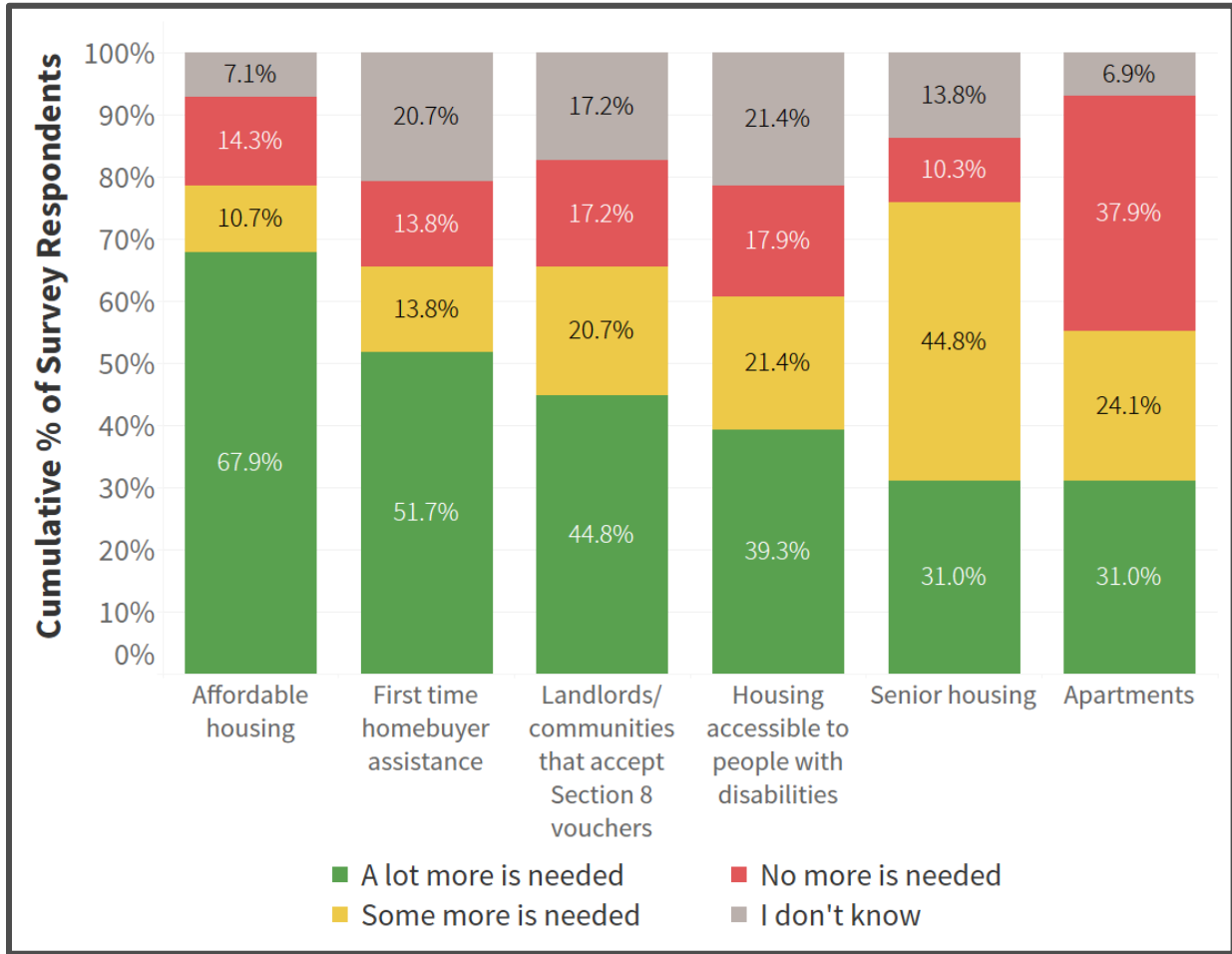
FIGURE 4. IF YOU WISH TO LIVE CLOSER TO YOUR WORKPLACE/MOVE TO ANOTHER AREA OF GASTONIA/ GASTON COUNTY, ARE ANY OF THE FOLLOWING BARRIERS PREVENTING YOU FROM DOING SO? (CHECK ALL THAT APPLY.)



Respondents’ Thoughts about Housing Needs

When asked about housing needs in Gastonia and Gaston County, survey respondents noted that the highest levels of need for help were for affordable housing, first-time homebuyer assistance, and landlords/ communities that accept Section 8/ Housing Choice Vouchers (see Figure 5). For all housing types, more than 50% of respondents noted that ‘a lot more is needed’ or ‘some more is needed,’ indicating high levels of need for affordable, accessible housing types in the city and county.

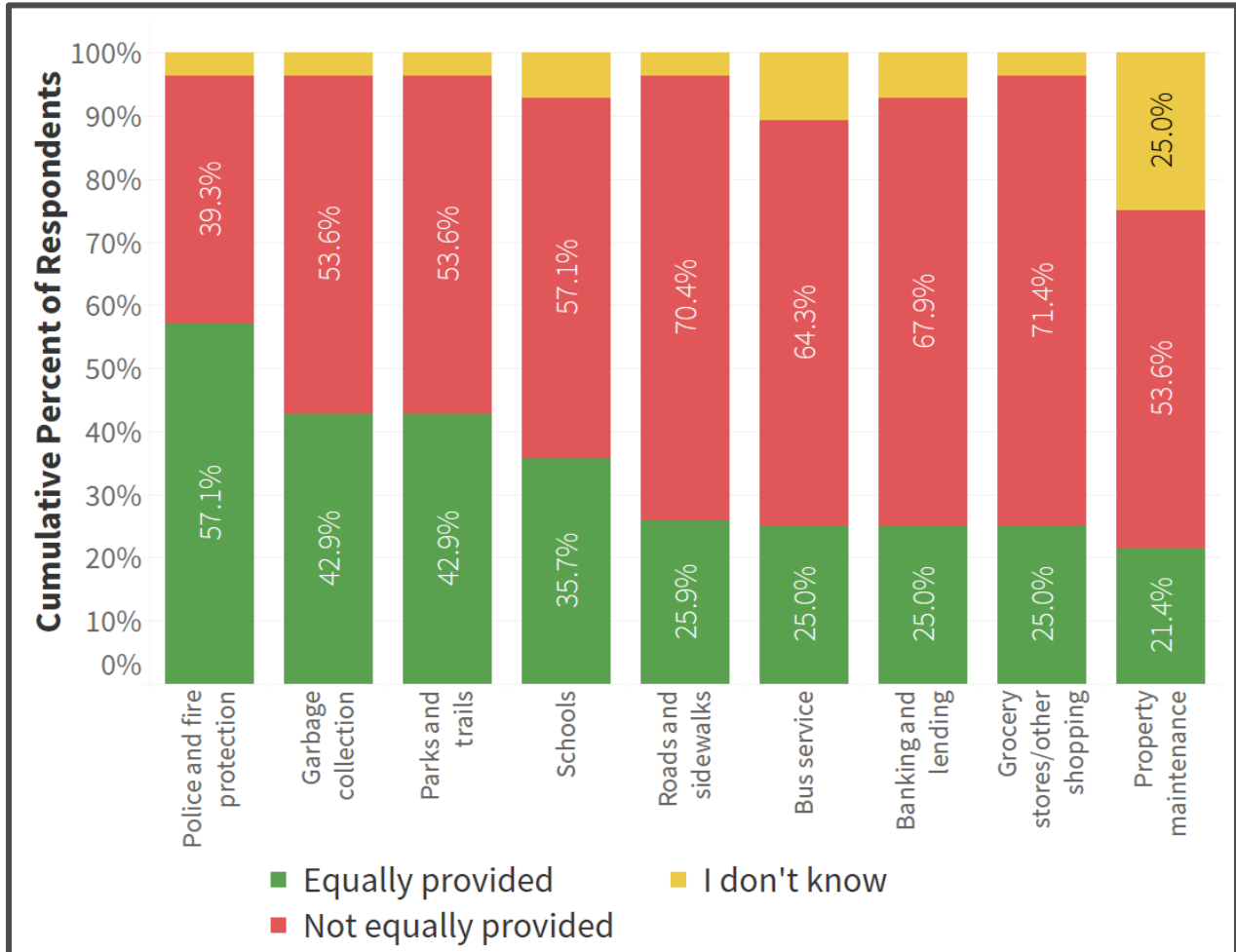
FIGURE 5. FOR EACH OF THE HOUSING OPTIONS LISTED BELOW, PLEASE INDICATE WHETHER YOU THINK MORE UNITS ARE NEEDED IN GASTONIA AND GASTON COUNTY.



Respondents’ Thoughts about Access to Community Resources

When asked about the distribution of community resources, survey respondents indicated that police and fire protection, garbage collection, and parks and trails were most equally provided (see Figure 6). Survey respondents rated grocery stores and other shopping, roads and sidewalks, and banking and lending as the resources that are least equally provided. Notably, police and fire protection was the only community resource rated as equally provided by more than half of survey respondents.

FIGURE 6. PLEASE CHECK WHETHER YOU THINK EACH OF THE FOLLOWING ARE EQUALLY PROVIDED ACROSS ALL COMMUNITIES IN GASTONIA AND GASTON COUNTY.



Respondents' Thoughts about Fair Housing

Most survey participants reported understanding or somewhat understanding their fair housing rights (62.1% and 24.1%, respectively; see Figure 7). While only 13.8% of respondents said that they did not know their fair housing rights, 65.5% said they would not know where to file a housing discrimination complaint (see Figure 8).

FIGURE 7. RESPONSES TO “DO YOU UNDERSTAND YOUR FAIR HOUSING RIGHTS?” FROM THE COMMUNITY SURVEY

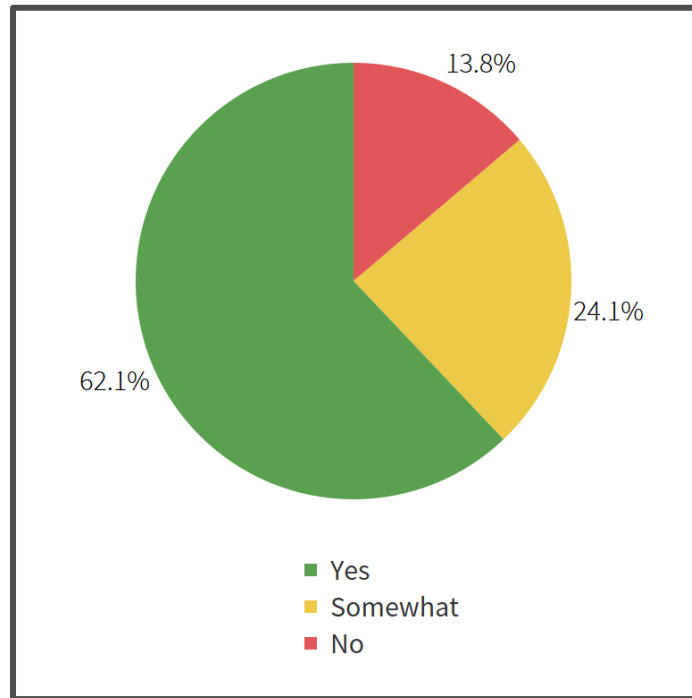
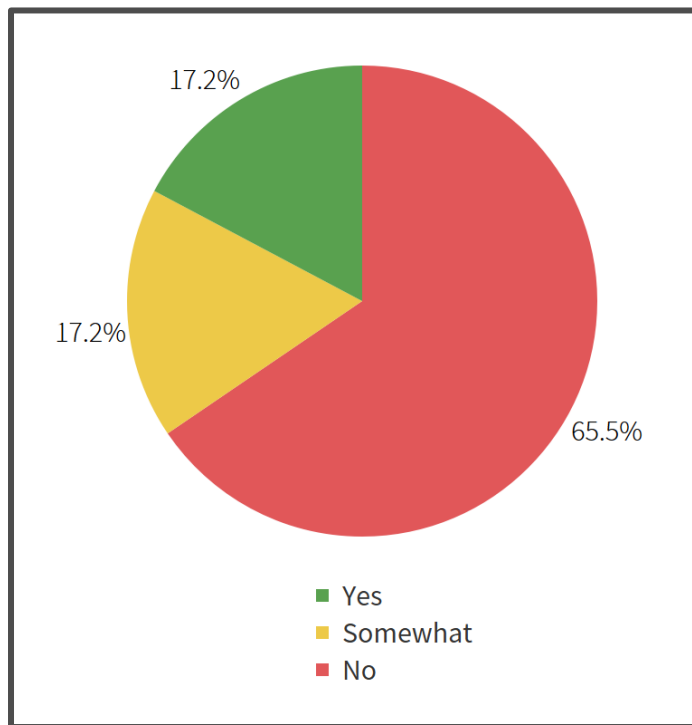


FIGURE 8. RESPONSES TO “DO YOU KNOW WHERE TO FILE A HOUSING DISCRIMINATION COMPLAINT?” FROM THE COMMUNITY SURVEY



Nine survey participants experienced housing discrimination while living in Gastonia or Gaston County. Of those nine respondents:

- Five noted that they were discriminated against by landlords or property managers, four by real estate agents, three by mortgage lenders, and three by City or County staff.
- Race the most common basis for discrimination, cited by six people, followed by ethnicity (four people), and familial status (two people). Disability, national origin, and sex were each noted as bases for discrimination by one survey respondent.
- Only one of the respondents who experienced discrimination filed a complaint. Reasons for not filing discrimination complaints included being afraid of retaliation (identified by four people), not knowing what good it would do (identified by three people), not knowing where to file (identified by one person), the process for filing not being accessible because of a disability (identified by one person), and not having time to file (identified by one person).

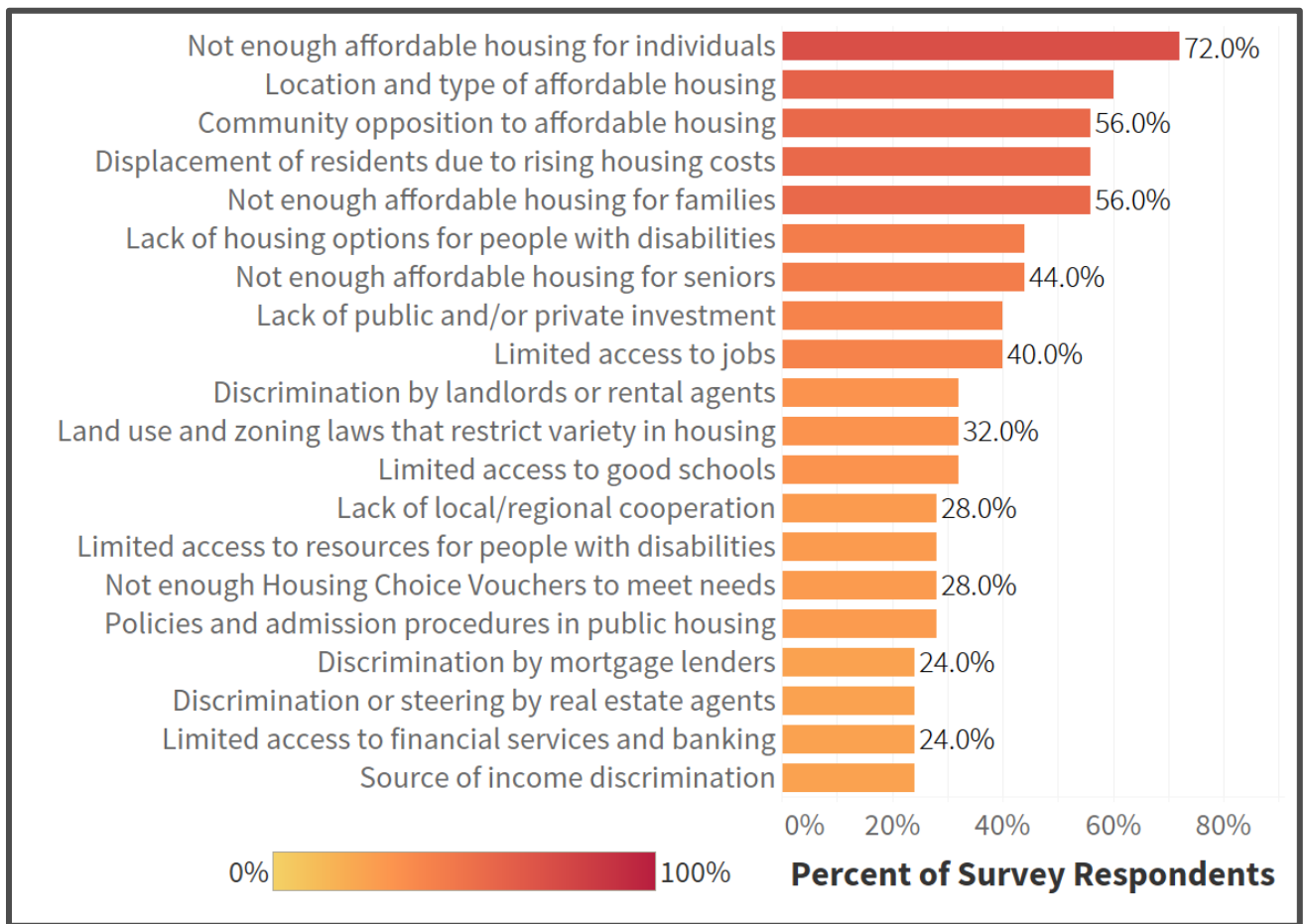
About two-thirds of respondents (65.5%) said they believe housing discrimination is an issue or may be an issue in the city and county, while 13.8% said they do not believe housing discrimination is an issue.

When asked to select any factors that are barriers to fair housing in Gastonia and Gaston County, respondents most often identified the following (see Figure 9):

- Not enough affordable housing for individuals (72.0%)
- Location and type of affordable housing (60.0%)
- Community opposition to affordable housing (56.0%)
- Displacement of residents due to rising housing costs (56.0%)
- Not enough affordable housing for families (56.0%)
- Lack of housing options accessible to people with disabilities (44.0%)
- Not enough affordable housing for seniors (44.0%)

Notably, the top responses focused on the need for increasing the supply of affordable and accessible housing and reducing the displacement of residents due to rising housing costs.

FIGURE 9. DO YOU THINK ANY OF THE FOLLOWING ARE BARRIERS TO FAIR HOUSING IN YOUR COMMUNITY? (CHECK ALL THAT APPLY.)



Socioeconomic Profile

Background

Gastonia is located within Gaston County and the Charlotte-Concord-Gastonia, NC-SC Metropolitan Statistical Area, or MSA. The City was home to an estimated 80,411 residents as of the 2020 Census. Residents of Gastonia comprise around 35% of Gaston County's total population and about 3% of the MSA's total population. The most recently available estimates from the 2018-2022 American Community Survey show that the city's population has grown by about 14% since 2005, while the county's population has grown by about 13%⁴.

Demographic Profile

Race and Ethnicity

White residents are the predominant racial or ethnic group in Gastonia, comprising just over half of all residents. Black residents make up just over 30% of the city's population, and Hispanic and Latino residents make up about 13%. Other racial and ethnic groups are significantly less represented, with Asian and Pacific Islander residents accounting for just 1.7% of all residents and Native American residents accounting for 0.3%. Residents of two or more races make up 3.9% of the population, while residents of other races make up 0.4%. In comparison to the county and the MSA, Gastonia has a smaller share of white residents and larger shares of other racial or ethnic groups.

As shown in Table 2, Gastonia has become more diverse over time. Black and Hispanic residents have increased in population share, while white, Asian or Pacific Islander, and Native American residents have decreased slightly. Data for residents of two or more races or other races was unavailable in earlier data sources. Trends were similar within Gaston County, although the county as a whole is less diverse than Gastonia.

National Origin

Gastonia is home to approximately 5,313 foreign-born residents, who make up about 6.6% of the city's population. The most common birth country for foreign-born residents is Mexico, with foreign-born residents from Mexico comprising 1.6% of the total population. The next most common birth country is Colombia, accounting for 1.2% of all residents. Residents born in El Salvador, Trinidad and Tobago, or India round out the top five most common birth countries of foreign-born residents, although the latter three countries each account for 0.5% or less of the population.

⁴ 2020 U.S. Census data provides more accurate information on race and ethnicity, while 2018-2022 ACS data provides the most current population estimates. Both data sets are included in the tables below: table 1 includes race, ethnicity, and total population data from the 2020 Census, while table 2 includes the same data from the 2018-2022 ACS.

Foreign-born residents make up a larger share of the population in the MSA (10.8%) than in either Gastonia (6.6%) or Gaston County (5.2%). The most common country of birth for these residents in all three jurisdictions is Mexico, but other top five countries of origin differ. Colombia is the second most common country of origin for foreign-born residents in Gaston County, followed by El Salvador, India, and Vietnam. The MSA's top five countries of origin are Mexico, India, Honduras, El Salvador, and Vietnam.

Limited English Proficiency (LEP)

Gastonia, Gaston County, and the MSA all report very high levels of English proficiency. Around 3-5% of residents in each jurisdiction have limited English proficiency (LEP), defined as speaking English less than “very well.” Spanish is the primary language spoken at home by residents with limited English proficiency in all three jurisdictions, followed by other Indo-European languages and Asian or Pacific Island languages. LEP Spanish speakers account for 3.5% of Gastonia's population, while LEP speakers of other languages account for less than 1% of the city and county's populations.

Disability

According to the 2018-2022 American Community Survey, 14.8% of Gastonia residents, 14.7% of Gaston County residents, and 10.5% of MSA residents have at least one disability. Gastonia's disability rate is slightly higher than both the U.S. overall disability rate of 12.9% and the North Carolina overall disability rate of 13.3%.

The most common disability type in Gastonia is an ambulatory disability, or a disability that impacts a person's ability to walk. An estimated 8.4% of Gastonia residents have this type of disability, in contrast to just 5.2% of MSA residents. This disability type is particularly significant in the need for disability-accessible housing, as people with ambulatory disabilities often require accessibility modifications such as ramps and wider hallways.

Independent living (because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping) and cognitive difficulties are the second and third most common disabilities in Gastonia at 5.5% and 5.4% of all residents, respectively. These statistics are also higher than those for the MSA, although not as notably as for ambulatory difficulty—4.0% of MSA residents experience a cognitive impairment, and 3.5% experience an independent living difficulty. These two disability types are significant in the need for disability-accessible housing in that they are both more likely to involve live-in care, requiring housing that is large enough for a live-in caregiver. Self-care difficulties may also require live-in care but are less common in Gastonia, with 2.6% of residents experiencing this type of disability.

Hearing and vision disabilities affect 3.8% and 3.2% of Gastonia residents, respectively. These disability types may also require accessibility additions or modifications for suitable housing. In particular, residents with these disabilities may require special considerations for emergency

systems, such as safe fire escape routes for visually impaired residents or visual rather than auditory fire alarms for hearing impaired residents.

Age

The age distributions within Gastonia, Gaston County, and Charlotte-Concord-Gastonia, NC-SC MSA are all very similar, although in Gastonia the working-aged population makes up a smaller share of the population and children make up a slightly larger share, relative to the county and MSA. In Gastonia, 24.8% of residents are children under the age of 18; 59.7% of the population is working-aged, or aged 18-64; and 15.5% of the population is aged 65 and up. Gastonia's population is slightly younger than that of the United States, in which 22.5% of the population is under age 18 and 16.0% is over age 65; however, data since 2005 shows that the share of the population under 18 is shrinking while the share of the population over age 65 is growing in all three jurisdictions. As the share of adults at or above retirement age continues to grow, the City will need to consider the housing needs of elderly adults more significantly when developing and rehabilitating housing.

Sex

Female residents make up a slightly greater share of the population (51.8%) than male residents in Gastonia. Similarly, in Gaston County and the MSA, 51.4% and 51.1% of the populations are female, respectively. These shares of female residents are slightly higher than the national average of 50.9% female residents.

Family Type

Families with children comprise 32.4% of Gastonia households, with 57% of such households headed by a couple, 20.7% headed by an unmarried mother, and 4.1% by an unmarried father. Couples without children also comprise a significant portion of Gastonia households at 31% of all households. 28.8% of Gastonia have at least one member aged 65 or older, and an estimated 8.3% of all households are householders aged 65 and over living alone. Household types are similar in the county and MSA, with Gastonia having a slightly higher share of single-parent households than the other two jurisdictions.

Since the 2005-2009 American Community Survey, the share of families with children has dropped slightly. At the same time the share of single-person households has dropped significantly, falling from 27.9% to 16.6% of all households. This may indicate that market conditions such as high housing costs or a lack of smaller units make it difficult for individuals to live alone.

TABLE 2. DEMOGRAPHIC OVERVIEW

Demographic Indicator	Gastonia			Gaston County			Charlotte-Concord-Gastonia, NC-SC MSA		
		#	%		#	%		#	%
RACE / ETHNICITY									
Non-Hispanic or Latino									
White		40,855	50.8%		153,653	67.4%		1,537,545	57.8%
Black		24,334	30.3%		39,762	17.4%		572,695	21.5%
Asian or Pacific Islander		1,406	1.7%		3,568	1.6%		115,422	4.3%
Native American		216	0.3%		753	0.3%		8,186	0.3%
Other Race		329	0.4%		844	0.4%		13,092	0.5%
Two or More Races		3,100	3.9%		9,295	4.1%		101,205	3.8%
Hispanic or Latino		10,171	12.6%		20,068	8.8%		312,184	11.7%
TOTAL POPULATION		80,411	100.0%		227,943	100.0%		2,660,329	100.0%
NATIONAL ORIGIN FOR FOREIGN-BORN RESIDENTS									
#1 Region of Origin	Mexico	1,320	1.6%	Mexico	3,341	1.5%	Mexico	52,277	2.0%
#2 Region of Origin	Colombia	982	1.2%	Colombia	1,267	0.6%	India	32,952	1.2%

Demographic Indicator	Gastonia			Gaston County			Charlotte-Concord-Gastonia, NC-SC MSA		
		#	%		#	%		#	%
#3 Region of Origin	El Salvador	408	0.5%	El Salvador	480	0.2%	Honduras	18478	0.7%
#4 Region of Origin	Trinidad & Tobago	153	0.2%	India	422	0.2%	El Salvador	11,039	0.4%
#5 Region of Origin	India	140	0.2%	Vietnam	391	0.2%	Vietnam	9,841	0.4%
TOTAL FOREIGN-BORN POPULATION		5,313	6.6%		11,804	5.2%		286,135	10.8%
LIMITED ENGLISH PROFICIENCY (LEP LANGUAGE)									
#1 LEP Language	Spanish	2,797	3.5%	Spanish	5,696	2.5%	Spanish	98,824	3.7%
#2 LEP Language	Other Indo-European Languages	196	0.2%	Other Asian/Pacific Islander Languages	720	0.3%	Other Asian/Pacific Islander Languages	22,214	0.8%
#3 LEP Language	Other Asian/Pacific Islander Languages	187	0.2%	Other Indo-European Languages	437	0.2%	Other Indo-European Languages	19,130	0.7%
#4 LEP Language	Other Languages	77	0.1%	Other Languages	110	0.05%	Other Languages	6,155	0.2%

Demographic Indicator	Gastonia			Gaston County			Charlotte-Concord-Gastonia, NC-SC MSA		
		#	%		#	%		#	%
TOTAL LEP POPULATION		3,257	4.1%		6,963	3.1%		146,323	5.5%
AGE									
Under 18		19,970	24.8%		51,134	22.4%		619,546	23.3%
18 to 64		47,995	59.7%		139,372	61.1%		1,666,735	62.7%
65+		12,446	15.5%		37,437	16.4%		374,048	14.1%
DISABILITY TYPE									
Ambulatory Difficulty		6,658	8.4%		18,405	8.1%		137,243	5.2%
Independent Living Difficulty		4,344	5.5%		12,002	5.3%		93,579	3.5%
Cognitive Difficulty		4,257	5.4%		12,316	5.4%		106,364	4.0%
Hearing Difficulty		3,018	3.8%		9,410	4.2%		72,699	2.7%
Vision Difficulty		2,533	3.2%		6,528	2.9%		49,951	1.9%
Self-Care Difficulty		2,044	2.6%		6,188	2.7%		51,013	1.9%

Demographic Indicator	Gastonia			Gaston County			Charlotte-Concord-Gastonia, NC-SC MSA		
		#	%		#	%		#	%
TOTAL POPULATION WITH A DISABILITY		11,717	14.8%		33,386	14.7%		278,517	10.5%
SEX									
Male		38,852	48.2%		111,225	48.6%		1,305,000	48.9%
Female		41,763	51.8%		117,747	51.4%		1,363,688	51.1%
FAMILY TYPE									
Households with Children		10,104	32.4%		27,843	30.8%		332,521	32.4%
Couple with Children		5,765	18.5%		17,201	19.0%		227,167	22.1%
Female Householder, No Partner, Children		2,092	6.7%		4,923	5.4%		58,485	5.7%
Male Householder, No Partner, Children		419	1.3%		1,406	1.6%		12,099	1.2%
Couple without Children		9,644	31.0%		31,485	34.8%		339,041	33.0%

Demographic Indicator	Gastonia		Gaston County			Charlotte-Concord-Gastonia, NC-SC MSA			
		#	%		#	%		#	%
Households with one or more members aged 65+		8,970	28.8%		27,429	30.3%		264,235	25.8%
Householder aged 65+ living alone		2,601	8.3%		7,777	8.6%		65,054	6.3%
TOTAL HOUSEHOLDS		31,151	100.0%		90,427	100.0%		1,026,048	100.0%

Data Sources: 2020 U.S. Census Redistricting Data; 2018-2022 5-Year American Community Survey, Tables S1601, S05006, DP02, S0101, S1810, and S1101

NOTE: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total households, and disability, which is out of total non-institutionalized population. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

NOTE: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total households.

TABLE 3. DEMOGRAPHIC TRENDS

Demographic Indicator	2005-2010		2010-2015		2018-2022	
	#	%	#	%	#	%
Gastonia						
Race Ethnicity						
White, Non-Hispanic	42,355	59.9%	42,096	57.5%	43,371	53.8%
Black	18,526	26.2%	20,499	28.0%	24,023	29.8%
Hispanic/Latino	7,212	10.2%	7,468	10.2%	8,384	10.4%
Asian or Pacific Islander	1,556	2.2%	1,171	1.6%	1,048	1.3%
Native American	354	0.5%	293	0.4%	242	0.3%
TOTAL POPULATION	70,709	100.0%	73,211	100.0%	80,615	100.0%
National Origin						
Foreign-Born	5,802	8.2%	5,679	7.8%	5,313	6.6%
Limited English Proficiency						
LEP	3,326	5.0%	3,301	4.9%	3,257	4.1%
Age						
Under 18	17,677	25.0%	19,254	26.3%	19,970	24.8%
18 to 64	44,052	62.3%	44,000	60.1%	47,995	59.7%
65+	8,980	12.7%	9,957	13.6%	12,446	15.5%
Sex						
Male	32,842	46.4%	35,078	47.9%	38,852	48.2%
Female	37,867	53.6%	38,133	52.1%	41,763	51.8%
Family Type						
Families with Children	9,607	35.4%	9,122	34.1%	10,104	32.4%
Single Householder	7,564	27.9%	7,488	28.0%	5,181	16.6%

Demographic Indicator	2005-2010		2010-2015		2018-2022	
	#	%	#	%	#	%
Gaston County						
Race / Ethnicity						
White, Non-Hispanic	155,629	76.8%	156,306	74.5%	159,136	69.5%
Black	30,194	14.9%	31,891	15.2%	39,383	17.2%
Hispanic/Latino	11,348	5.6%	13,218	6.3%	18,318	8.0%
Asian or Pacific Islander	2,432	1.2%	3,147	1.5%	4,121	1.8%
Native American	1,013	0.5%	839	0.4%	687	0.3%
TOTAL POPULATION	202,642	100.0%	209,807	100.0%	228,972	100.0%
National Origin						
Foreign-Born	9,520	4.7%	11,228	5.4%	11,804	5.2%
Limited English Proficiency						
LEP	5,663	3.0%	6,178	3.1%	6,963	3.1%
Age						
Under 18	49,039	24.2%	48,885	23.3%	51,134	22.4%
18 to 64	127,259	62.8%	130,290	62.1%	139,372	61.1%
65+	26,343	13.0%	30,632	14.6%	37,437	16.4%
Sex						
Male	97,801	48.3%	101,627	48.4%	111,225	48.6%
Female	104,841	51.7%	108,180	51.6%	117,747	51.4%
Family Type						
Families with Children	26,778	34.6%	24,779	31.3%	27,843	30.8%
Singe Householder	20,346	26.3%	21,964	27.7%	14,393	15.9%
<i>Data Sources: American Community Survey, 2005-2010, 2010-2015, 2018-2022, tables S0101, S0601, B05006, S1601, and S1101</i>						

Racially and Ethnically Concentrated Areas of Poverty

The Analysis of Impediments to Fair Housing Choice uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty in the United States is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Latino populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁵ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

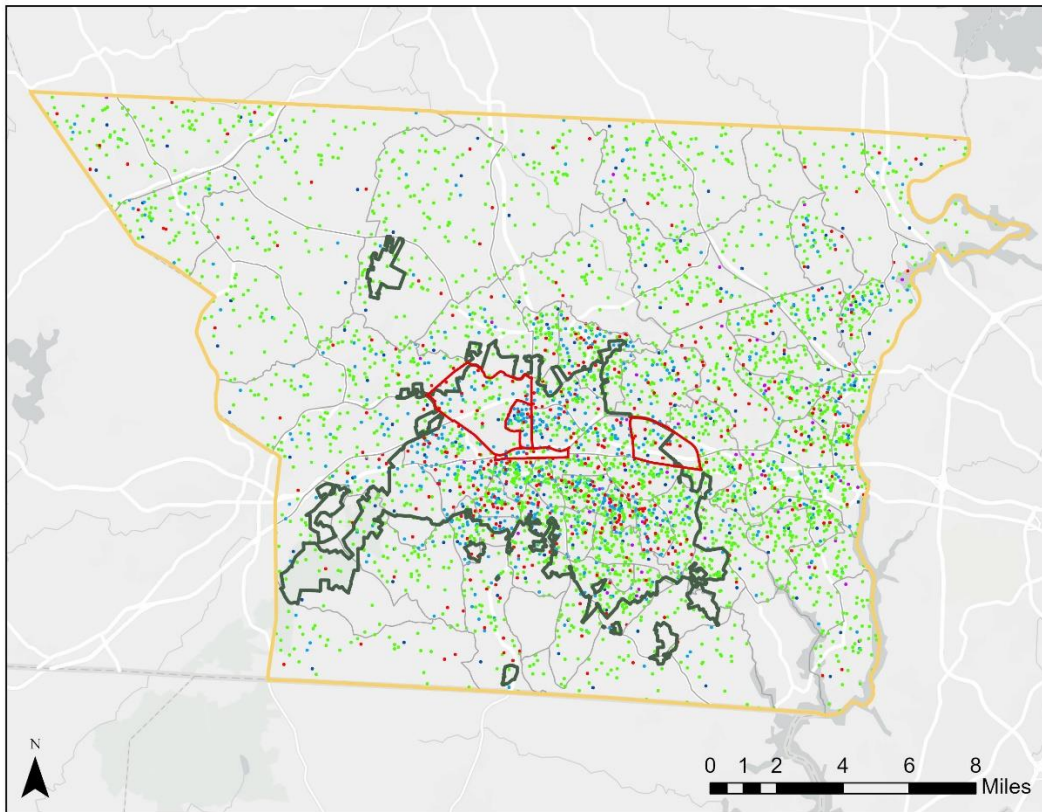
Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. Poverty is concentrated within the largest metro areas, but suburban regions have experienced the fastest growth in poverty.⁶

In 2020, there were four census tracts in Gastonia that met the definition of a R/ECAP (see Figure 10). All four tracts are located in the northern part of the city, with three tracts clustered in the northwest corner and one tract in the northeast corner. The predominant racial and ethnic groups within the tracts are Black and Hispanic residents. Notably, these tracts contain an overall lower residential density than most other parts of the city (see Figure 10).

⁵ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁶ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." The Brookings Institution, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

**FIGURE 10. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY
IN GASTONIA AND GASTON COUNTY, 2020**



2020 Race & Ethnicity

1 Dot = 50 people

- White
- Black/African American
- Hispanic or Latino
- Native American
- Asian/Pacific Islander
- Some Other Race
- Two or More Races

□ Gastonia □ Gaston County □ RIECAPs

Source: 2020 U.S. Census

Segregation and Integration

Background

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁷

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

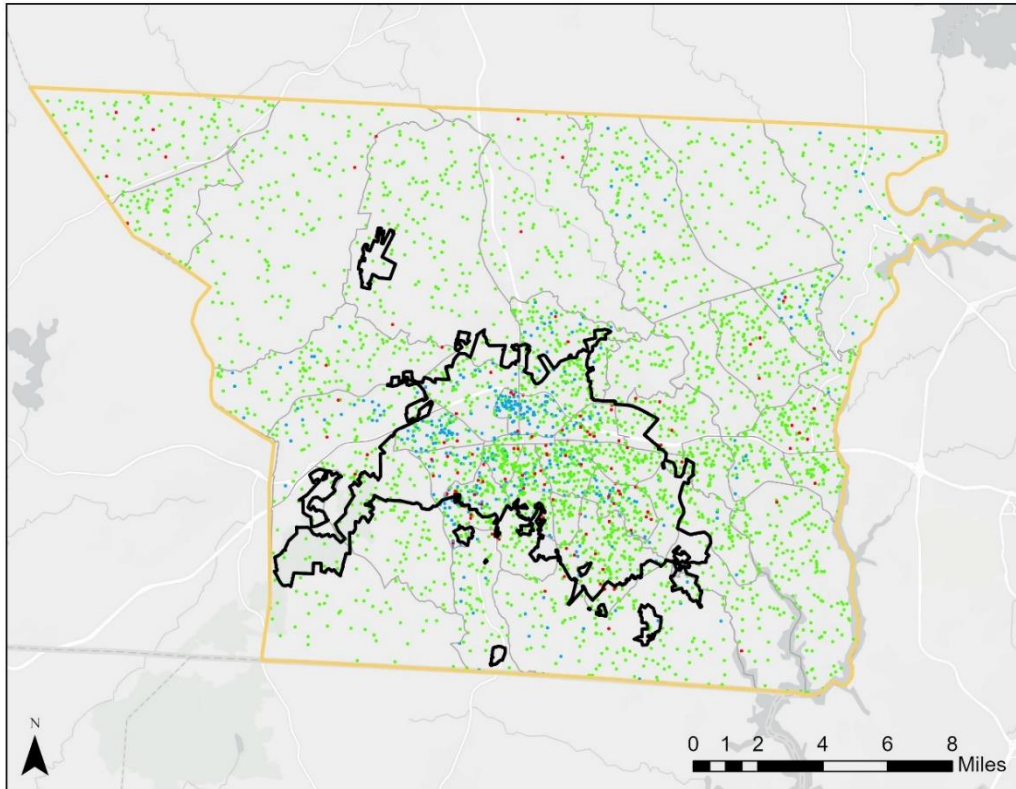
Race and Ethnicity

Figures 11, 12, and 13 map the population in the city of Gastonia by race and ethnicity using 2000, 2010, and 2020 Census data. Population distribution patterns by race and ethnicity throughout the city and county indicate that Gaston County is comprised of primarily white residents, with numbers of Black and Hispanic/Latino residents increasing each decade. The spatial distribution of the region's total population has remained relatively similar, with neighborhoods becoming more densely populated over time. The central and eastern portions of Gastonia have the greatest residential density, while the northwestern quadrant of the city has a lower density of residents.

Some racial and ethnic clustering exists within Gastonia and Gaston County. While most areas of the city have some diversity, white residents are spread most evenly throughout the city and county. Black residents are more clustered in the northern, central, and western portions of the city, while Hispanic residents are spread through most of the city with the exception of the southeastern corner, which is almost exclusively populated by white residents. Residents of other races or ethnicities are not present at high enough numbers to demonstrate notable clustering.

⁷ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>.

FIGURE 11. POPULATION BY RACE AND ETHNICITY IN GASTONIA AND GASTON COUNTY, 2000



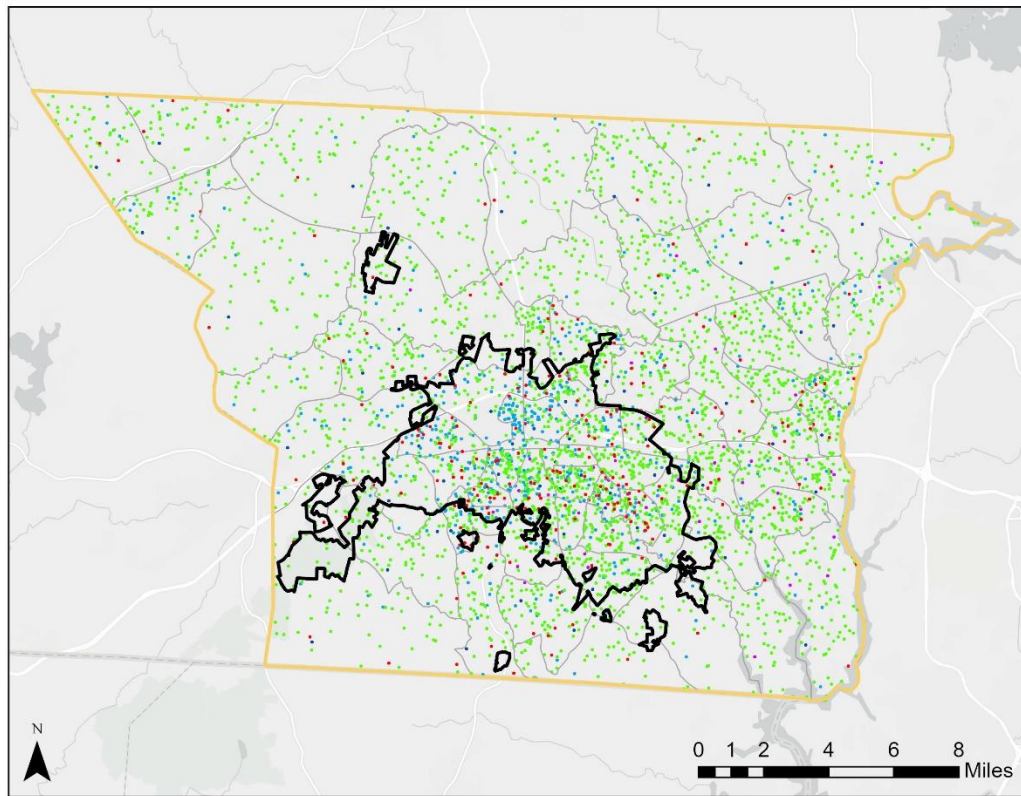
Race and Ethnicity, 2000

1 dot = 50 people

- White
- Black
- Hispanic/Latino
- Gastonia
- Gaston County

Source: 2000 U.S. Census

FIGURE 12. POPULATION BY RACE AND ETHNICITY IN GASTONIA AND GASTON COUNTY, 2010



Race and Ethnicity, 2010

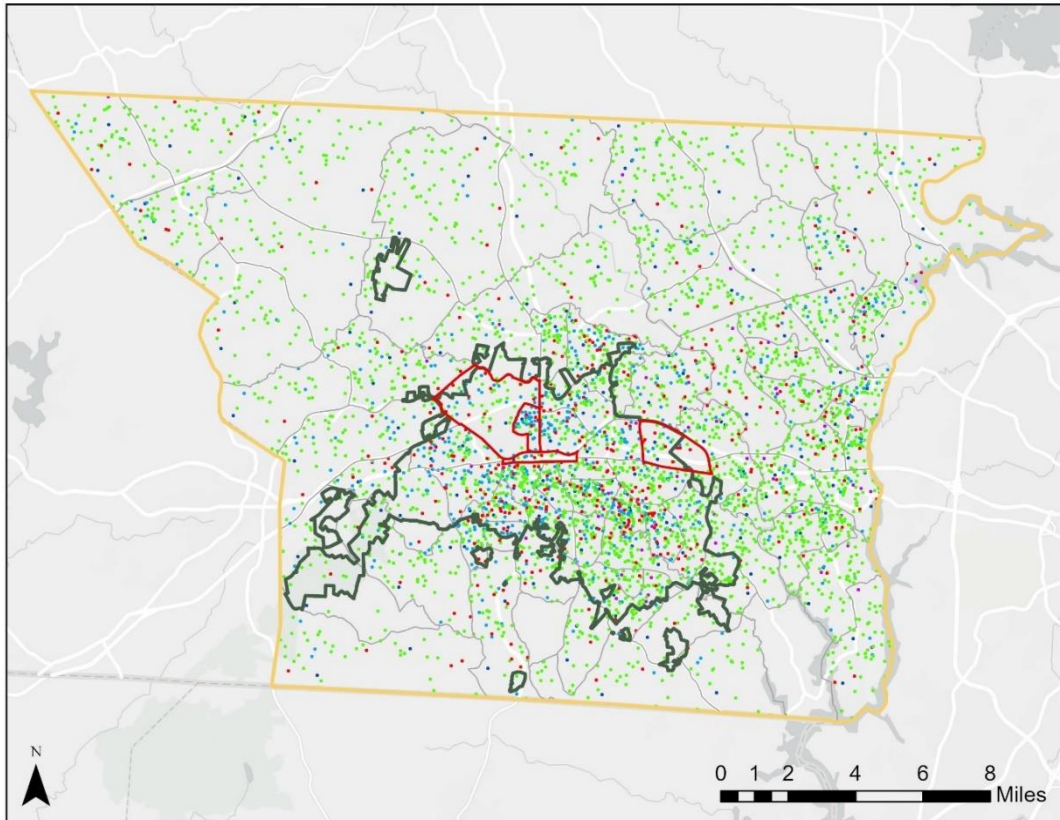
1 dot = 50 people

- White
- Black
- Hispanic/Latino
- Native American
- Asian/Pacific Islander
- Some Other Race
- Two or More Races

□ Gastonia □ Gaston County

Source: 2010 U.S. Census

FIGURE 13. POPULATION BY RACE AND ETHNICITY IN GASTONIA AND GASTON COUNTY, 2020



2020 Race & Ethnicity

1 Dot = 50 people

- White
- Black/African American
- Hispanic or Latino
- Native American
- Asian/Pacific Islander
- Some Other Race
- Two or More Races

▭ Gastonia ▭ Gaston County ▭ RIECAPs

Source: 2020 U.S. Census

Segregation Levels

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a type of statistical analysis—referred to as dissimilarity—to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. The DI represents the proportion of one group that would have to change their area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for four pairings in Gastonia. This table presents values for 1990, 2000, 2010, and current, all calculated using census tracts as the area of measurement.

TABLE 4. RACIAL AND ETHNIC DISSIMILARITY INDEX TRENDS IN GASTONIA

Race/Ethnicity	Gastonia			
	1990	2000	2010	Current
Non-White/White	45.86	37.07	30.13	37.64
Black/White	48.28	41.41	33.17	42.47
Latino/White	16.83	38.48	29.31	39.55
Asian or Pacific Islander/White	26.74	23.76	26.51	32.35

Data Sources: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>.

The Dissimilarity Indices calculated for each pairing in Gastonia show a decline in segregation levels between all residents except Hispanic and white residents from 1990-2000 and 2000-2010, but an increase in all segregation levels from 2010-current. Segregation between Hispanic and white residents increased dramatically from 1990-2000, before dropping from 2000-2010 and then

rebounding back to 2000 levels in the present time. Based on HUD’s definition, racial and ethnic segregation between Black and white residents is considered moderate, and segregation between Hispanic and white residents is nearly considered moderate. Segregation between Asian and white residents is low, as is overall segregation between non-white and white residents; however, all segregation levels have increased significantly enough since 2010 that if this pattern continues segregation will reach moderate to high levels across the board by 2030.

National Origin and Limited English Proficiency Population

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations in recent years.⁸ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁹

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.¹⁰ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹¹

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

The residential patterns of foreign-born populations in Gastonia and Gaston County are shown in Figure 14. The overall foreign-born population is relatively small (approximately 6.6% of Gastonia’s total population). Residents from Mexico comprise the largest foreign-born population and are

⁸ James, F., Romine, J., & Zwanzig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

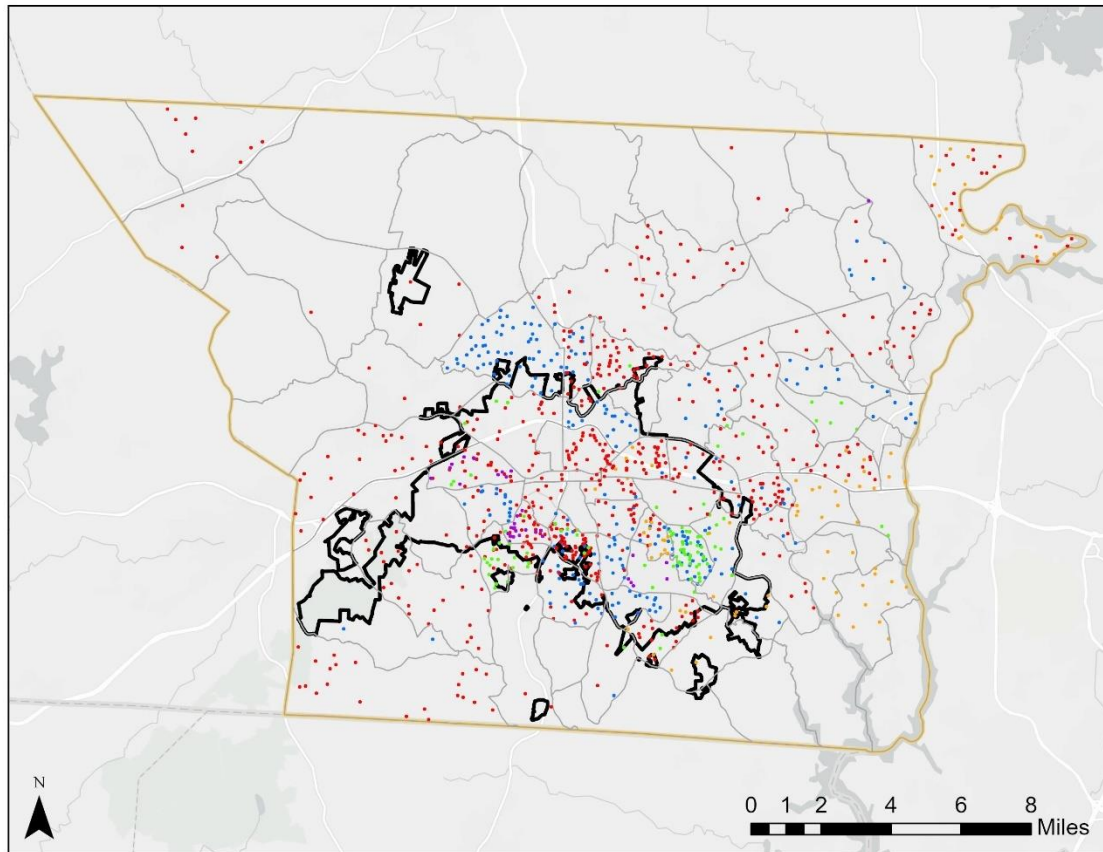
⁹ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

¹⁰ Zong, J. & Batalova, J. (2015). “The Limited English Proficient Population in the United States” Migration Information Source. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>.

¹¹ Golding, E., Goodman, L., & Strohach, S. (2018). “Is Limited English Proficiency a Barrier to Homeownership?” Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>.

distributed mostly throughout the central portion of the City. Spatial patterns show that most Colombian residents are clustered in neighborhoods in the far north and far south parts of the City. Residents from El Salvador are clustered almost entirely within one census tract in eastern Gastonia, as are residents from India in an adjacent tract. Residents from Trinidad and Tobago are slightly less clustered and reside in several tracts in the southern and western portions of the City.

FIGURE 14. FOREIGN-BORN POPULATION BY NATIONALITY IN GASTONIA AND GASTON COUNTY, 2018 TO 2022



Foreign-Born Population by Place of Birth

1 dot = 5 people

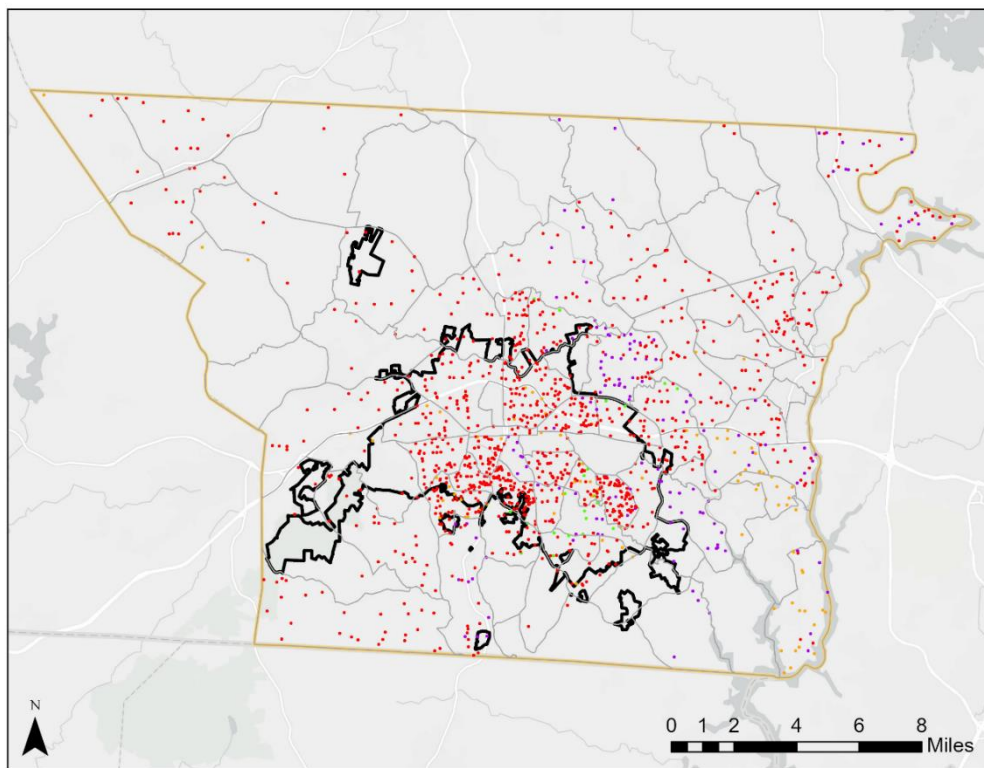
- Mexico
- Colombia
- El Salvador
- Trinidad & Tobago
- India

▭ Gastonia ▭ Gaston County

Source: 2018-2022 ACS, Table B05006

The overwhelming majority of the LEP population in Gastonia are Spanish speakers, who are distributed relatively evenly throughout the City. These residents are more widespread and more evenly distributed than immigrants from Spanish-speaking countries, indicating that a portion of Gastonia’s primarily Spanish-speaking population was born in the United States. Speakers of Asian/Pacific Island languages are mostly found in the central and southeastern portions of the City, while speakers of other Indo-European languages besides Spanish or English are located almost exclusively in the same southeastern census tracts as Trinidadian, El Salvadorian, and Indian residents.

FIGURE 15. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN GASTONIA AND GASTON COUNTY, 2018 TO 2022



Language Spoken by LEP Residents

1 dot = 5 people

- Spanish
- Asian/Pacific Islander Languages
- Other Indo-European Languages
- All other languages

▭ Gastonia ▭ Gaston County

Source: 2018-2022 ACS, Table S1610

Access to Opportunity

Background

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

The strategy to improve access to opportunity through housing and community development programs has been two-pronged. Programs such as tenant-based housing vouchers provide recipients with mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in low- or moderate-income neighborhoods. The following sections access the opportunity in Gastonia and Gaston County, including employment and workforce development, education, transportation, environmental quality, fresh food, and healthcare.

Employment and Workforce Development

Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors—transportation options, the types of jobs available in the area, or the education and training necessary to obtain them—may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. Labor market engagement and jobs proximity, when considered together, often offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In Gastonia, 26.5% of residents aged 25 and over hold a bachelor's degree or higher, a share slightly higher than that of Gaston County (23.3%) but lower than that of the state of North Carolina overall (33.0%). Geographic disparities exist, with the percentage of residents with bachelor's degrees or higher ranging from as low as 4% to 61% across the city's census tracts. Residents of central Gastonia and west Gaston County tend to have the lowest levels of educational attainment, while educational attainment tends to be highest in southeast Gastonia and east Gaston County (see Figure 16).

Disparities in educational attainment also exist by race and ethnicity in the city. Asian residents tend to have the highest levels of educational attainment (an estimated 42.6% of residents aged 25 and over have a bachelor's degree or higher), followed by residents of two or more races (35.2%). American Indian/Alaska Native residents and residents who identify as some other race are least likely to have higher levels of education (12.2% and 9.2% have a bachelor's degree or higher, respectively; see Figure 17).

FIGURE 16. EDUCATIONAL ATTAINMENT

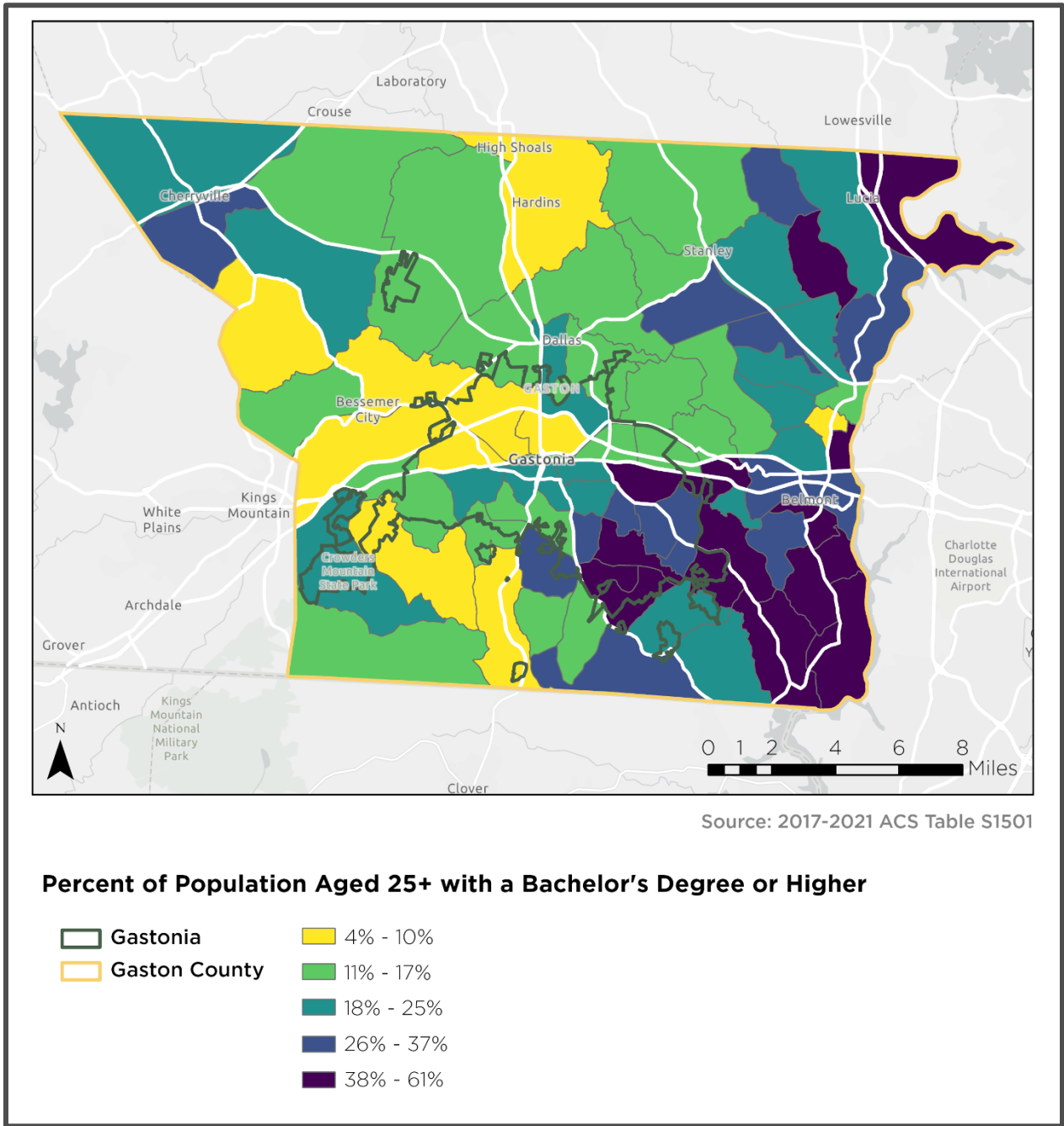


FIGURE 17. EDUCATIONAL ATTAINMENT BY RACE / ETHNICITY, CITY OF GASTONIA, 2017 TO 2021

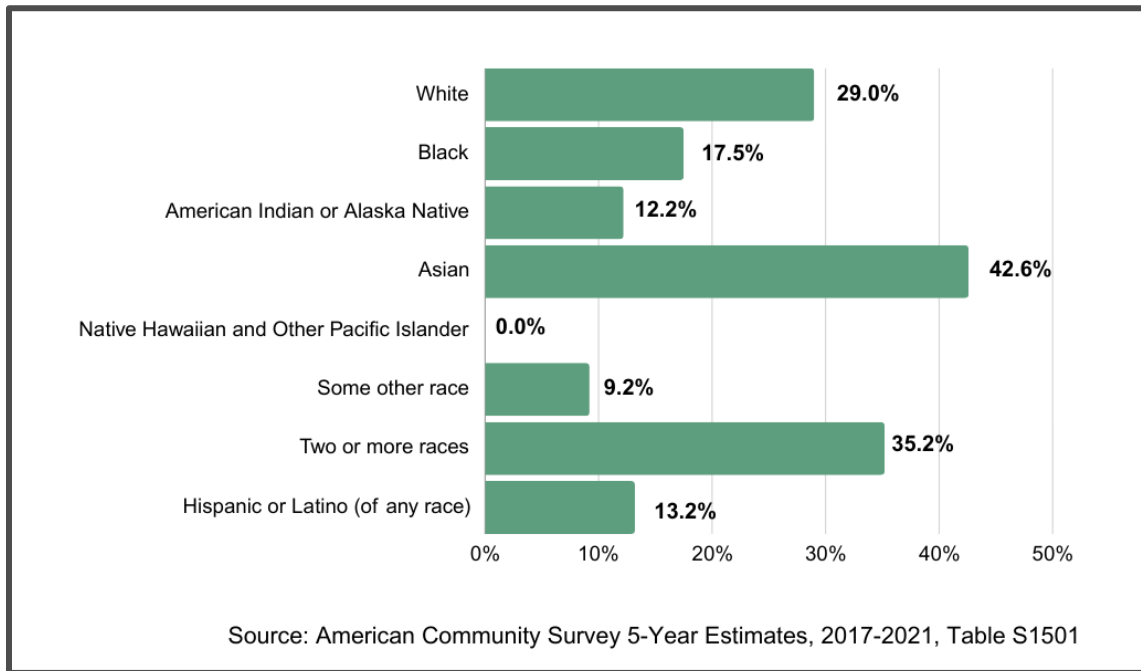


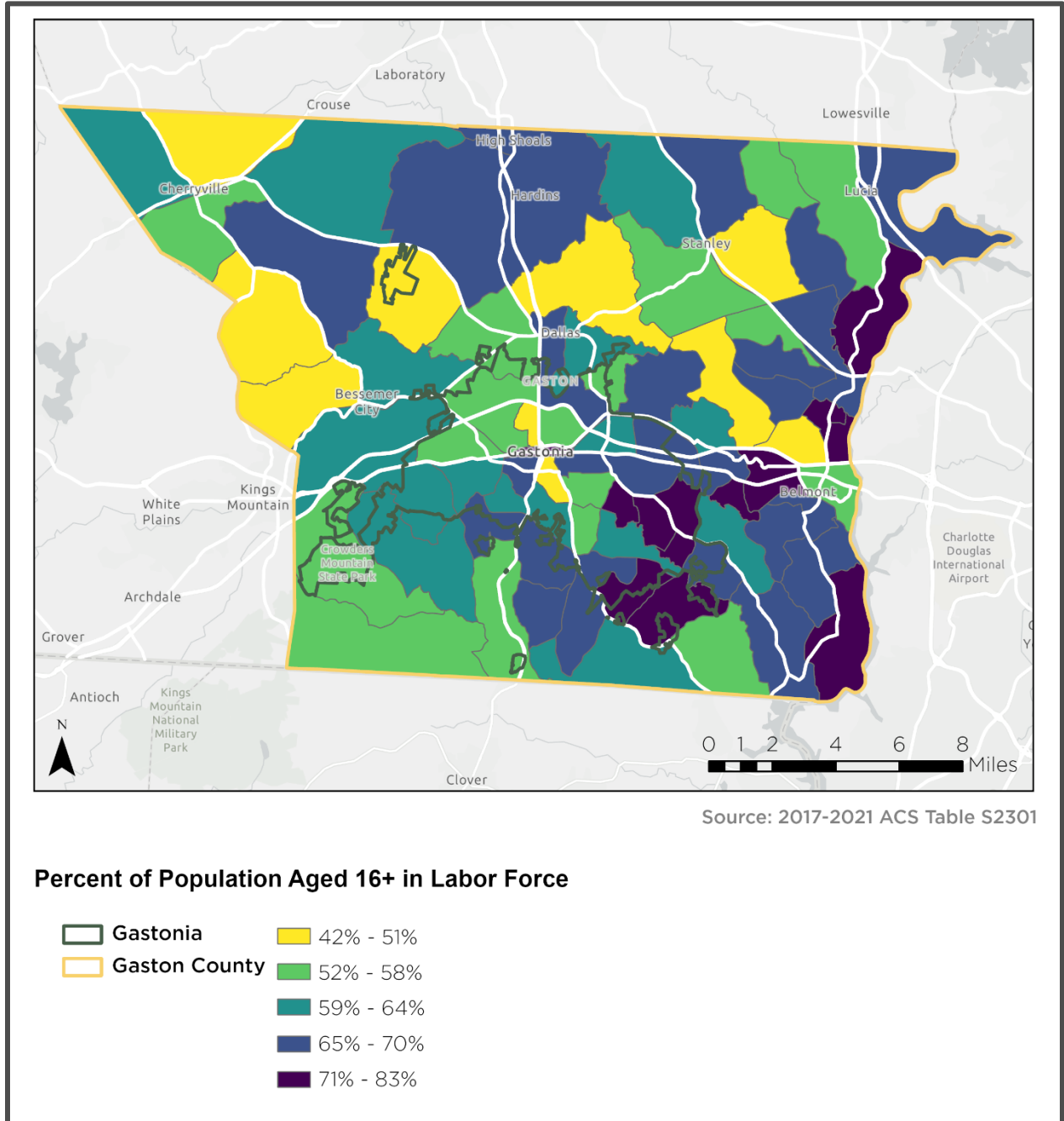
FIGURE 18. GASTON COLLEGE



An estimated 65.0% of the population aged 16 and over in Gastonia participates in the labor force, a share slightly higher than that of Gaston County (62.9%) and of the state of North Carolina overall (62.6%). As with educational attainment, geographic disparities exist, with labor force participation rates ranging from 42% to 83% in census tracts across the city. Residents of west-central Gastonia

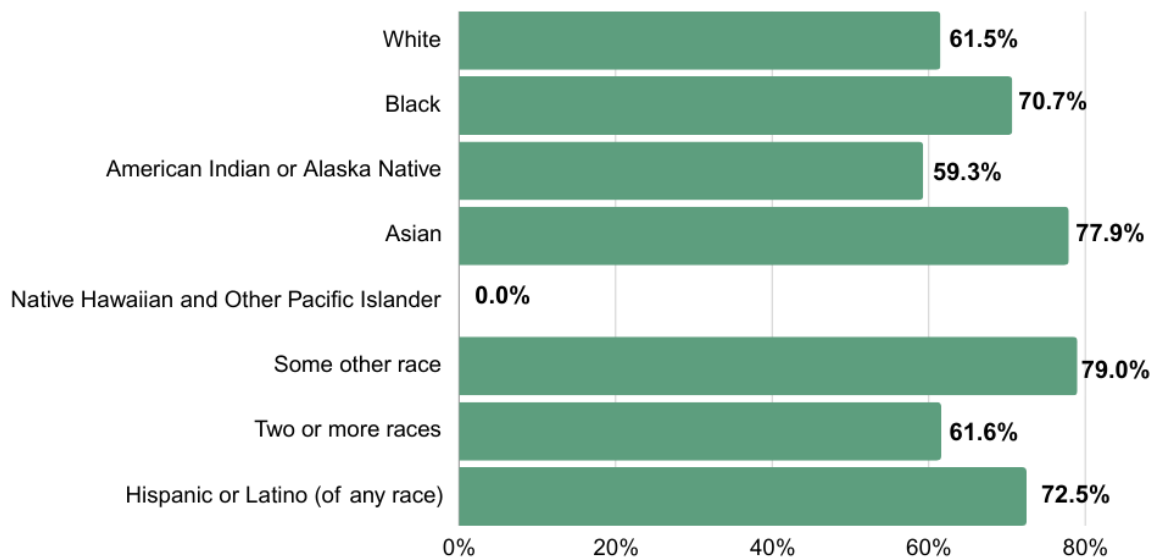
tend to participate in the labor force at the lowest levels, while participation tends to be highest in southeast Gastonia and eastern Gaston County (see Figure 19).

FIGURE 19. LABOR FORCE PARTICIPATION



Labor force participation is highest among residents of some other race and Asian residents (an estimated 79.0% and 77.9% of whom participate in the labor force, respectively) and lowest among white residents (61.5% of whom participate; see Figure 20).

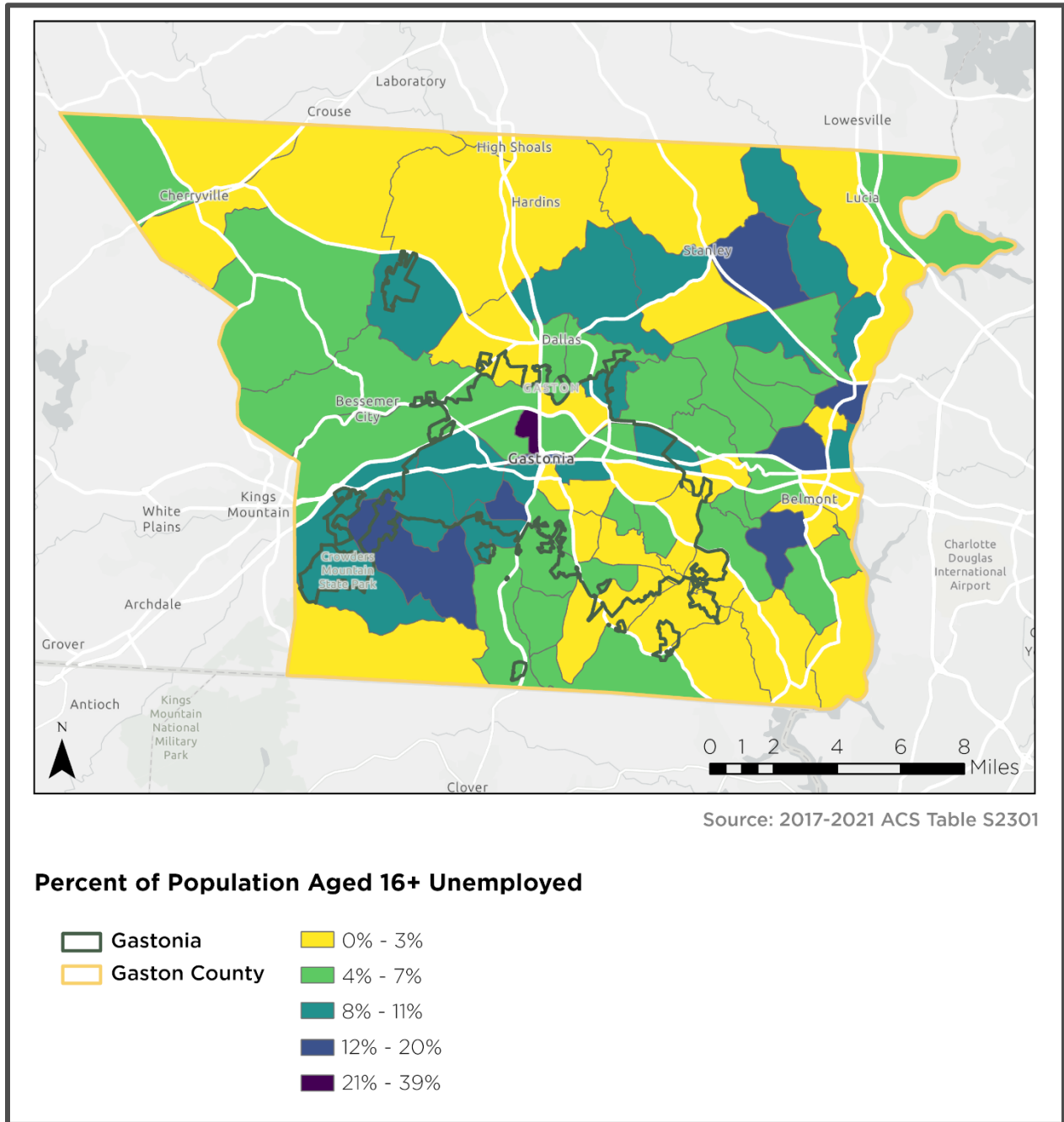
FIGURE 20. LABOR FORCE PARTICIPATION BY RACE / ETHNICITY, CITY OF GASTONIA, 2017 TO 2021



Source: American Community Survey 5-Year Estimates, 2017-2021, Table S2301

An estimated 5.6% of Gastonia’s residents were unemployed as of the 2017 to 2021 ACS five-year estimates, a rate similar to that of Gaston County (5.3%) and of the state of North Carolina overall (5.3%). As with educational attainment and labor force participation, unemployment varies across the city’s census tracts, ranging from 0% to 39% of residents aged 16 and over. Unemployment is highest in central and west Gastonia, including in the city’s RECAPs (up to 39%; see Figure 21). Unemployment rates throughout the rest of Gaston County tend to range between 0% to 20%, with higher rates of unemployment near Crowders Mountain State Park area and in northeastern Gaston County. More updated data from the North Carolina Department of Commerce shows the unemployment rate in Gaston County at 3.3% as of November 2023.

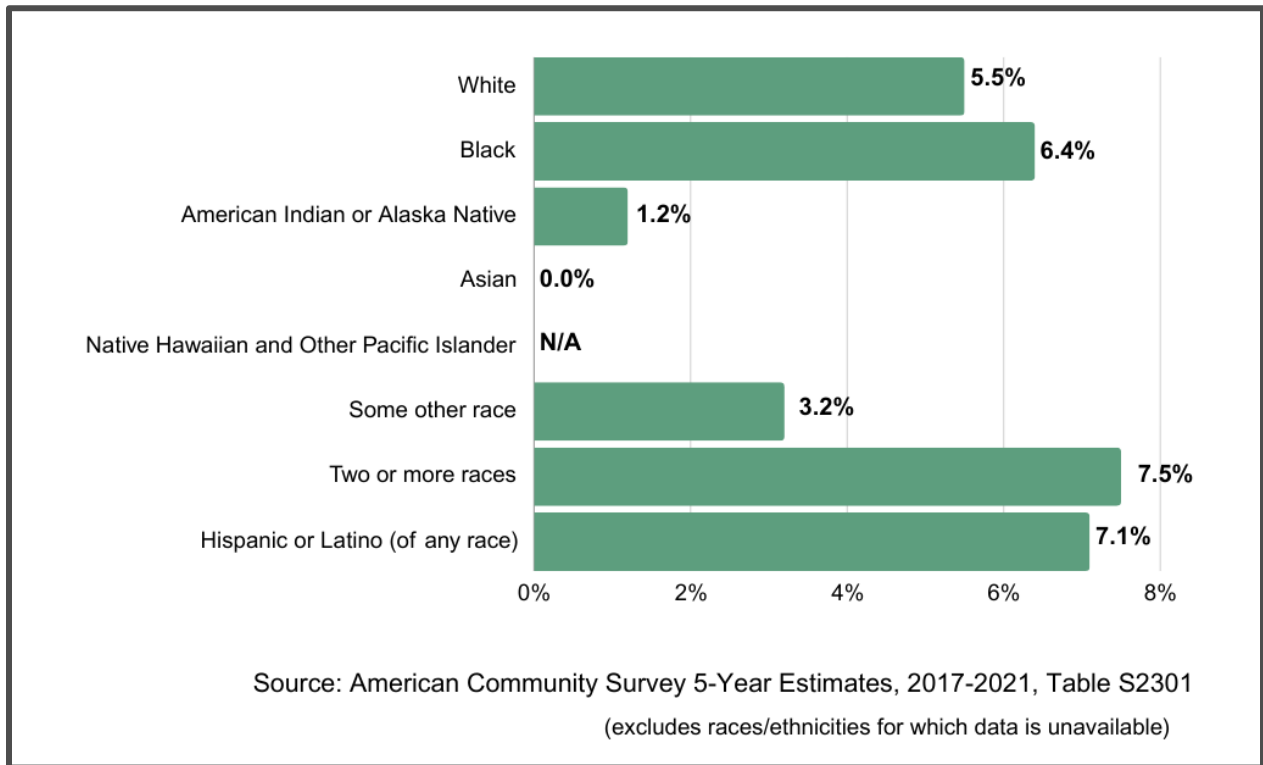
FIGURE 21. UNEMPLOYMENT RATE, GASTONIA AND GASTON COUNTY, 2017-2021



Source: 2017-2021 ACS Table S2301

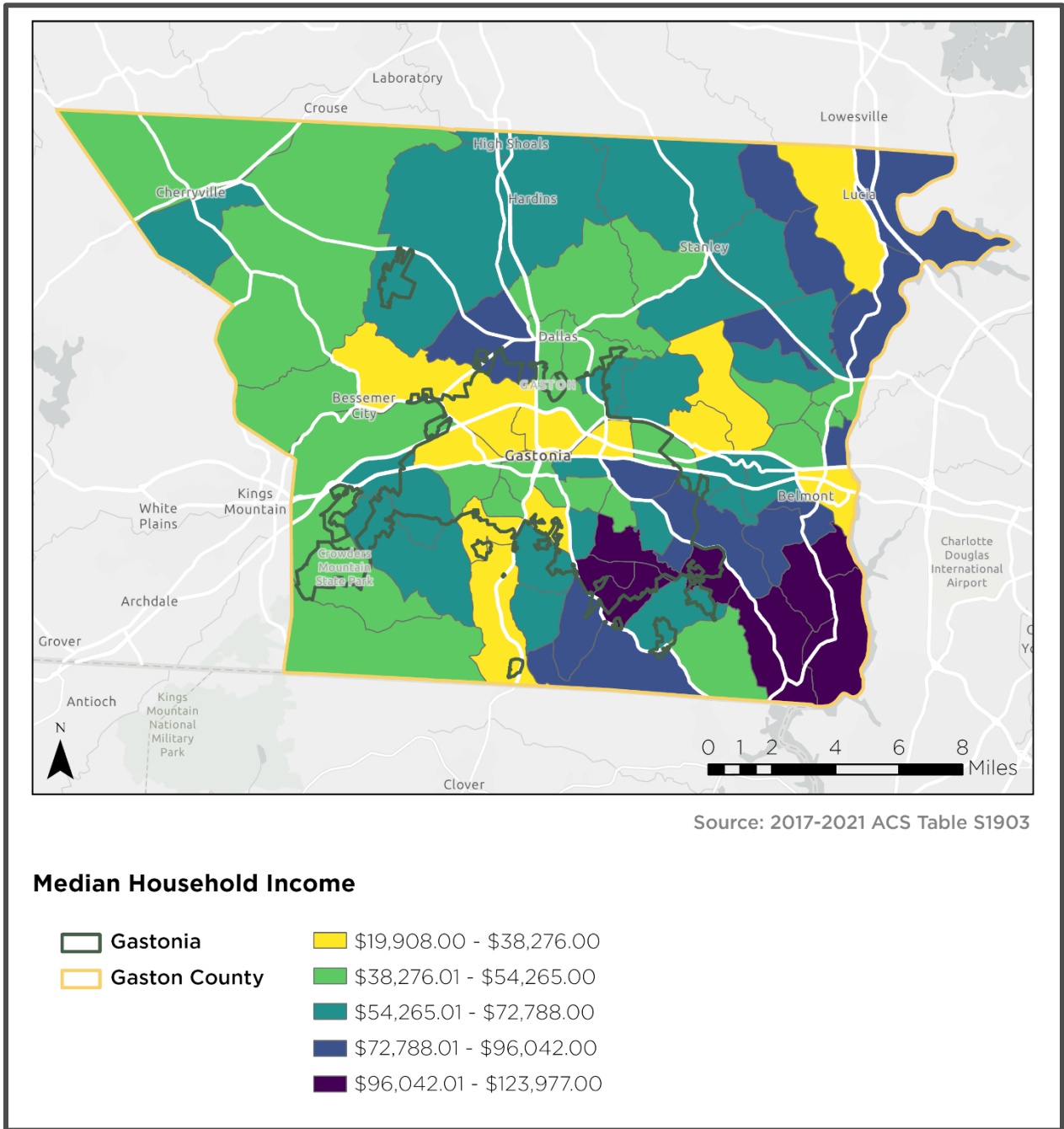
Unemployment is highest among residents of two or more races (7.5%), Hispanic or Latino residents (7.1%), and Black residents (6.4%) and lowest among Native American residents and residents of some other race alone (1.2% and 3.2%, respectively; see Figure 22).

FIGURE 22. UNEMPLOYMENT BY RACE / ETHNICITY, CITY OF GASTONIA, 2017-2021



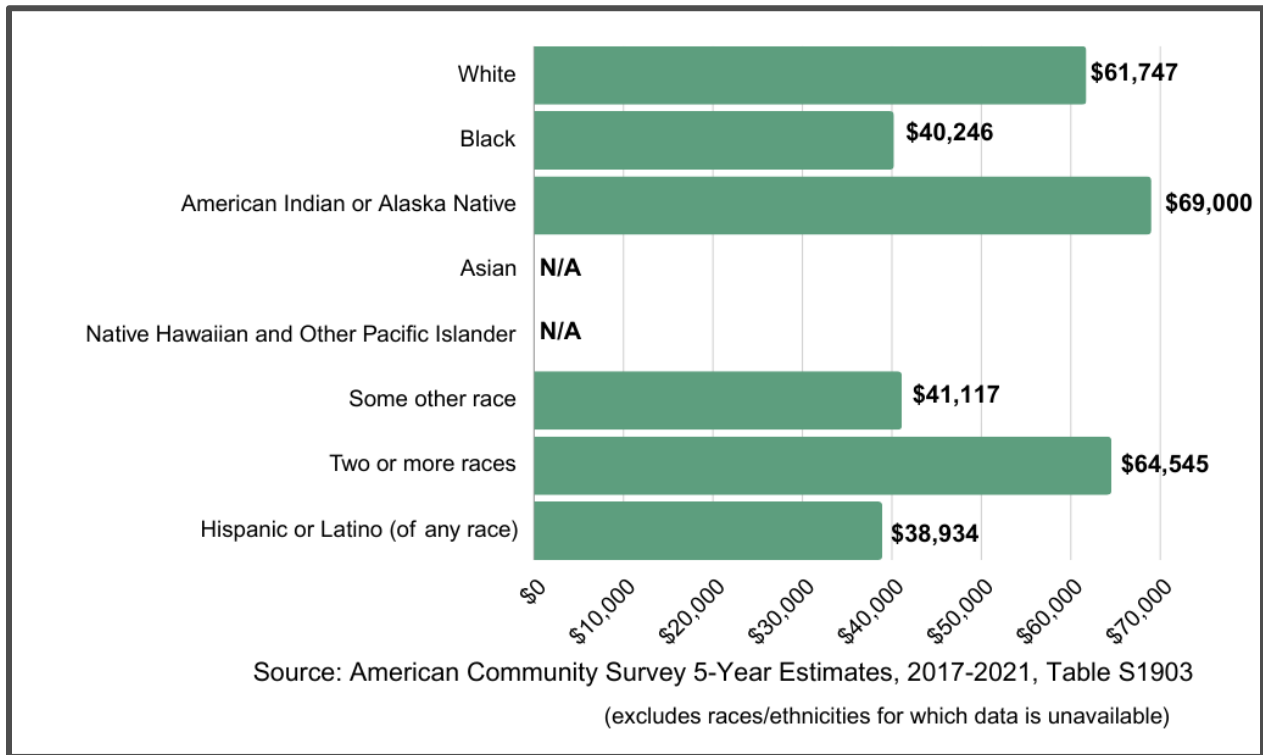
Household income is another indicator of access to employment and jobs that pay living wages. The median household income in Gastonia was \$52,990 as of the 2017-2021 American Community Survey five-year estimates, significantly lower than the median household income for the Charlotte-Concord-Gastonia MSA, which was estimated at \$69,559 over the same time period. Median household incomes are lowest in central Gastonia, where they fall between \$19,908 to \$38,276. Median incomes tend to be highest in southeast Gastonia and further in southeast Gaston County, topping \$123,977 (see Figure 23). Median household incomes are highest for American Indian/Alaska Native residents, (estimated at \$69,000) and lowest for Hispanic/Latino residents (\$38,934; see Figure 24).

FIGURE 23. MEDIAN HOUSEHOLD INCOME



Source: 2017-2021 ACS Table S1903

FIGURE 24. MEDIAN HOUSEHOLD INCOME BY RACE / ETHNICITY, CITY OF GASTONIA, 2017 TO 2021



Low median household incomes in many of the city’s census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. The required annual income to afford costs for a family of two working adults and one child in Gaston County, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, is estimated at \$84,782 before taxes.¹² Yet, 19.1% of primary jobs held by residents in Gastonia pay \$1,250 per month or less (\$15,000 or less per year), and 35.0% of primary jobs pay between \$1,251 and \$3,333 (between \$15,000 and \$39,996 per year).¹³

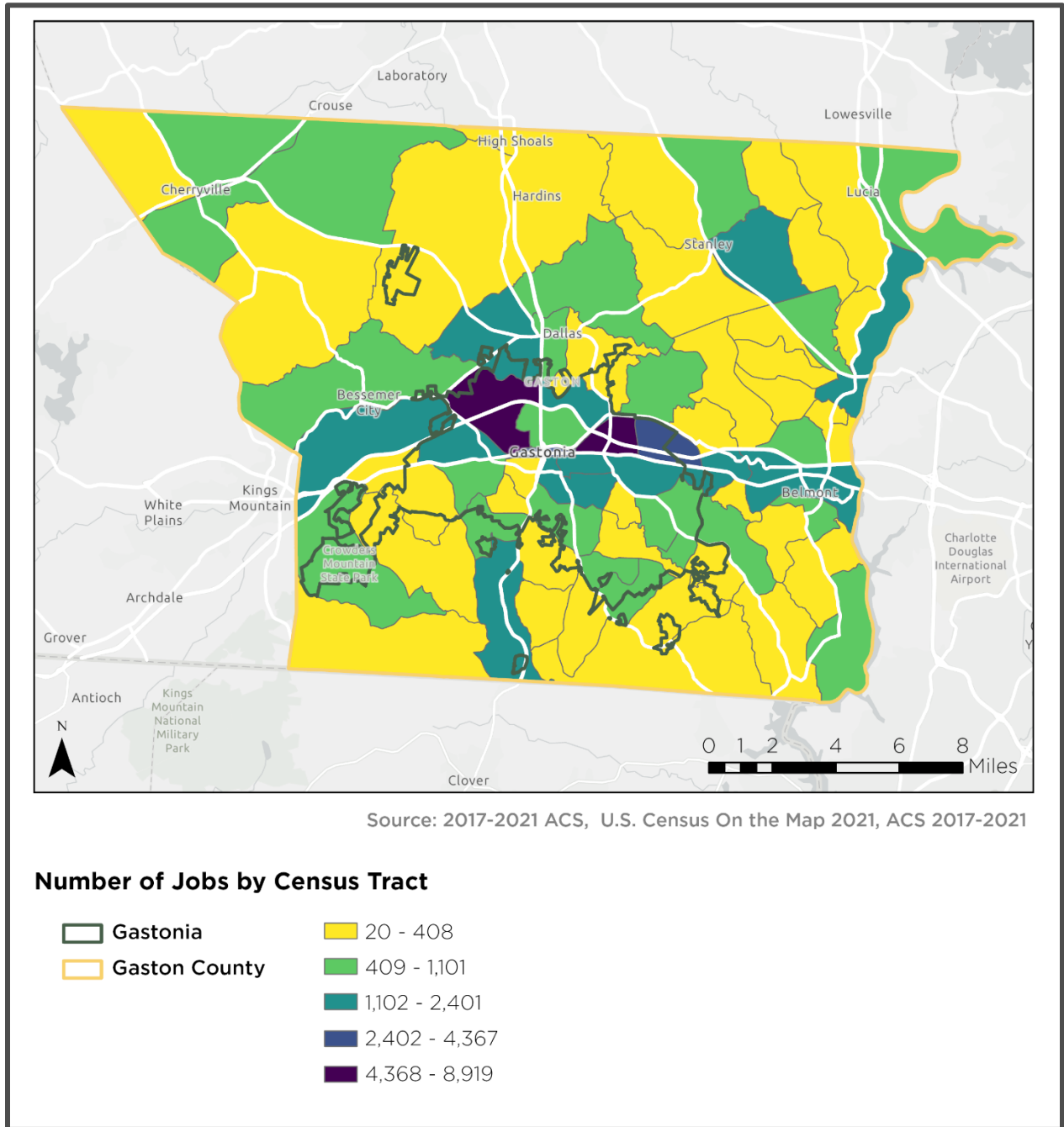
Jobs Proximity

Jobs in the Gastonia area tend to be clustered in north and northeast Gastonia and central Gaston County. Census tracts with the fewest jobs are clustered outside of the city of Gastonia (see Figure 25). There is a high concentration of jobs within and near Gastonia’s R/ECAPs tracts, which have some of the highest rates of poverty and unemployment, indicating that barriers other than proximity to jobs shape unemployment in these areas.

¹² MIT Living Wage Calculator. (2019-2022). Retrieved from: <https://livingwage.mit.edu/counties/37071>.

¹³ United States Census Bureau. OnTheMap. (2021). Retrieved from: <https://onthemap.ces.census.gov/>.

FIGURE 25. JOBS PROXIMITY, 2021



Source: 2017-2021 ACS, U.S. Census On the Map 2021, ACS 2017-2021

Residents and stakeholders who participated in this planning process noted that limited public transportation and low frequency of service in the city and county are often barriers to accessing employment for residents who do not have vehicles, particularly in areas that are not well-served by bus routes.

Longitudinal Employer-Household Dynamics data also indicates that a substantial share of workers living in Gastonia work outside of the city. Specifically, an estimated 35,121 employed residents live in Gastonia. These include 8,205 residents (23.4%) who both live and work in Gastonia and 26,916 residents who live in Gastonia but work outside of the city (76.6%). Similarly, of the 41,480 residents employed in Gastonia, 33,275 (80.2%) live outside of the city. A slightly lower share of Gaston County residents are employed outside of the county (68.0%, See Table 5). The high level of commuting across jurisdictions indicates that large shares of residents live in Gaston County for reasons other than employment and commute to other regional job centers such as the city of Charlotte.

TABLE 5. INFLOW AND OUTFLOW OF WORKERS (PRIMARY JOBS), CITY OF GASTONIA AND GASTON COUNTY, 2021

Inflow and Outflow of Workers	#	%
LIVING IN CITY OF GASTONIA	35,121	100.0%
Living in Gastonia but Employed Outside of the City	26,916	76.6%
Living and Employed in Gastonia	8,205	23.4%
EMPLOYED IN CITY OF GASTONIA	41,480	100.0%
Employed in Gastonia but Living Outside of the City	33,275	80.2%
Employed and Living in Gastonia	8,205	19.8%
LIVING IN GASTON COUNTY	106,105	100.0%
Living in Gaston County but Employed Outside of the County	72,160	68.0%
Living and Employed in Gaston County	33,945	32.0%
EMPLOYED IN GASTON COUNTY	72,834	100.0%
Employed in Gaston County but Living Outside of the County	38,889	53.4%
Employed and Living in Gaston County	33,945	46.6%

Data Sources: Longitudinal Employer-Household Dynamics (LODES) data, 2021.

Education

1. High-quality education is a vital community resource that can improve quality of life and lead to additional opportunities, such as employment and increased earnings. The Gaston County School District is the tenth largest school district in North Carolina which includes 30 elementary schools, 11 middle schools, and 8 high schools with over 29,602 students as of 2023. School proficiency levels and demographics vary across the district's schools (see Table 6): The share of students from low-income families varies widely among the district's schools, ranging from 29.1% at Highland School of Technology (high school) to 84.1% at Sherwood Elementary School. Notably, Highland School of Technology has the highest share of students from low-income households while having a low school performance ranking compared to Sherwood Elementary who has the highest school performance score of 100. Only two schools in the Gaston County School District hold an "A" performance ranking which includes Sherwood Elementary and Gaston Early College High School.
2. The Gaston County School District measures the academic growth of each school. The growth range is categorized as: "Exceeded" (85.0-100.0), "Met" (70.0-84.9), and "Not Met" (50.0-69.9). Cramerton Middle School, Highland School of Technology, and South Point High School have exceeded academic growth standards, with scores of 100. The percentage of economically disadvantaged students attending these schools ranges from 29.1% to 66.7%. Thirteen schools in the district have not met their academic growth standards, and in all of these schools, more than 50% of students are from low-income households, indicating a need for resources and expanded funding at schools who are not meeting their academic growth levels and also have a higher share of economically disadvantaged students.
3. Chronic absenteeism affects students' academic development and may indicate other barriers they may be experiencing. Chronic absenteeism in the district ranges from 5.1% to 49.8%. Ashbrook High School holds the highest rate of absenteeism (49.8%), has a high share of low-income students (72.7%), and has not met academic growth standards (68.8). In contrast, Gaston Early College High School holds the lowest rate of absenteeism (5.1%), is one of the only two schools in the district with an "A" ranking, and less than half of its student population is low income (40.6%). There is a need to address barriers to school attendance in schools with high rates of chronic absenteeism, such as homelessness, housing instability, transportation barriers, and other issues that may be impacting student attendance and performance.

**TABLE 6.
DEMOGRAPHICS AND PERFORMANCE BY DISTRICT AND SCHOOL, 2023**

District	Schools	Number of Students Enrolled	Low Performing Schools	Percent of Schools That Exceeded Growth Status	Percent of Schools That Met Growth Status	Percent of Schools That Did Not Meet Growth Status	English Learner Progress	Students Per Device	Chronic Absenteeism
Gaston County	56	29,602	17	31.4%	41.2%	27.5%	22.4%	0.7	26.7%

Data Source: North Carolina School Report Cards, 2023

School Name	Grade Level	Performance Grade	Performance Grade Score	Academic Growth	% Economically Disadvantaged	English Learner Progress	National Board Professional Certified Teachers	Number of Students Enrolled	Chronic Absenteeism
Belmont Central Elementary School	Elementary	B	70	71.3	31.5%	42.1%	2	682	11.5%
Bessemer City Central Elementary School	Elementary	F	36	57.9	72.4%	10.3%	0	405	23.4%
Bessemer City Primary School	Elementary	F	36	-	75.4%	67.6%	7	393	34.5%
Brookside Elementary School	Elementary	D	49	77.2	66.8%	38.6%	2.5	515	25.0%
Carr Elementary School	Elementary	C	60	90	64.1%	41.2%	3	629	23.5%
Catawba Heights Elementary School	Elementary	C	59	86.3	69.8%	46.9%	1	258	18.3%
Chapel Grove Elementary School	Elementary	D	47	69.3	71.8%	24.2%	4	340	26.1%
Cherryville Elementary School	Elementary	C	61	79.9	67.6%	-	5	369	22.2%

School Name	Grade Level	Performance Grade	Performance Grade Score	Academic Growth	% Economically Disadvantaged	English Learner Progress	National Board Professional Certified Teachers	Number of Students Enrolled	Chronic Absenteeism
Costner Elementary School	Elementary	C	59	80.9	64.3%	30.8%	0	477	27.5%
Edward D Sadler Jr Elementary School	Elementary	F	35	72.4	79.4%	29.4%	-	301	28.7%
Gardner Park Elementary School	Elementary	D	46	71.5	65.1%	41.5%	1	513	27.8%
Hawks Nest STEAM Academy	Elementary	B	78	76.6	36.0%	-	3	352	7.2%
Hershal H Beam Elementary School	Elementary	F	32	73.1	77.7%	30.7%	0	521	34.8%
Ida Rankin Elementary School	Elementary	C	69	92.5	58.6%	30.4%	4	487	13.8%
J B Page Primary School	Elementary	B	70	-	29.7%	-	1	337	12.2%
Kiser Elementary School	Elementary	C	58	78.9	66.4%	28.0%	1	331	18.0%
Lingerfeldt Elementary School	Elementary	F	37	66.7	81.6%	28.2%	1.33	388	33.4%
Lowell Elementary School	Elementary	C	60	85.8	73.6%	43.9%	4	404	26.8%
McAdenville Elementary School	Elementary	C	57	82.6	50.6%	27.3%	1	177	11.9%
New Hope Elementary School	Elementary	B	74	81.2	32.7%	36.4%	4	508	8.5%
North Belmont Elementary School	Elementary	B	71	92.6	59.5%	44.4%	4	310	15.1%
Pinewood Elementary School	Elementary	B	71	90	57.7%	45.5%	1.5	464	22.0%
Pleasant Ridge Elementary School	Elementary	D	50	69.1	64.1%	36.5%	1	873	23.2%
Robinson Elementary School	Elementary	D	52	73.3	63.7%	35.3%	3	386	21.7%
Sherwood Elementary School	Elementary	D	41	68.8	84.7%	50.0%	1	503	24.5%
Springfield Primary School	Elementary	C	58	-	55.4%	64.7%	3.5	283	34.0%

School Name	Grade Level	Performance Grade	Performance Grade Score	Academic Growth	% Economically Disadvantaged	English Learner Progress	National Board Professional Certified Teachers	Number of Students Enrolled	Chronic Absenteeism
Tryon Elementary School	Elementary	D	44	75.6	67.5%	48.0%	1.5	314	29.4%
W A Bess Elementary School	Elementary	C	68	78.8	46.6%	35.7%	4	621	15.8%
W B Beam Intermediate School	Elementary	D	54	58.3	65.8%	-	1	200	21.4%
Woodhill Elementary School	Elementary	F	38	74.8	80.8%	43.6%	0	466	36.7%
Belmont Middle School	Middle	C	64	74	42.5%	8.8%	3	742	20.1%
Bessemer City Middle School	Middle	C	57	100	66.7%	13.0%	2	504	32.8%
Cramerton Middle School	Middle	B	83	100	38.2%	9.5%	3	909	15.7%
Holbrook Middle School	Middle	D	52	76.1	76.3%	8.1%	0	772	18.6%
John Chavis Middle School	Middle	C	60	87.8	70.3%	<5.0%	3	411	25.5%
Mount Holly Middle School	Middle	C	59	84.6	63.9%	9.1%	3	549	17.3%
Southwest Middle School	Middle	D	48	86.9	66.6%	<5.0%	3	812	35.6%
Stanley Middle School	Middle	C	65	88.5	55.4%	<5.0%	2	664	25.9%
W C Friday Middle School	Middle	D	49	62.8	74.0%	<5.0%	0	603	24.6%
W P Grier Middle School	Middle	F	37	65.3	71.7%	<5.0%	0	613	33.7%
York Chester Middle School	Middle	D	47	89.7	77.6%	5.3%	0	421	30.1%
Ashbrook High School	High	C	60	68.8	72.7%	9.0%	4	1,260	49.8%
Forestview High School	High	C	66	58.3	47.6%	9.2%	8	1,057	27.9%
Gaston Early College High School	High	A	94	85.7	40.6%	-	3	227	5.1%
Highland School of Technology	High	A	100	100	29.1%	-	7	510	8.3%
Hunter Huss High School	High	D	54	65.1	83.1%	7.3%	1	1,056	46.5%
North Gaston High School	High	C	57	66.2	65.1%	10.0%	1	1,083	34.2%
South Point High School	High	B	82	96.2	31.2%	<5.0%	5	939	23.7%
Stuart W Cramer High School	High	C	63	56.2	44.6%	6.3%	5	935	31.2%

Data Source: North Carolina School Report Cards, 2023

Stakeholders interviewed during this planning process emphasized a need to expand youth education and recreation programming, to fund prevention and diversion efforts to eliminate homelessness, and to increase internet access for youth. Participants noted that school quality tends to be better in the southeastern part of Gastonia, with 57.1% of survey respondents noting that schools are not equally provided throughout the city and county.

A lack of affordable housing, low levels of access to transportation, and the limited number of high-performing schools in the city and county contribute to disparities in access to proficient schools among protected classes. Policies, programs, and funding mechanisms to increase the development of affordable housing and to reduce discrimination based on use of Housing Choice Vouchers in the county's higher-performing school zones can help to reduce disparities in access to proficient schools by income level, which is correlated with race and ethnicity in the city and county.

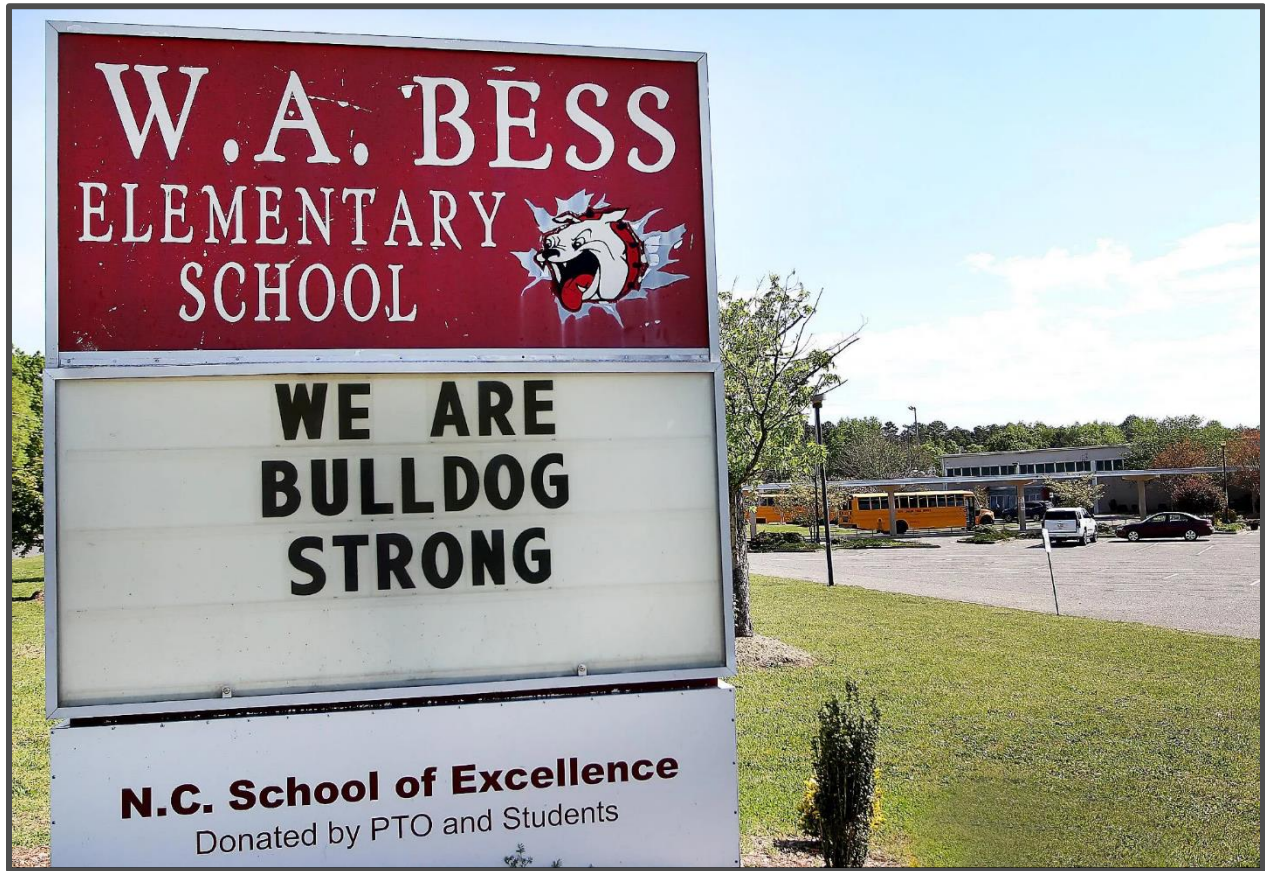
In addition to the need for programs, policies, and funding to increase residents' ability to live in areas with proficient schools, there is a high level of need for strategies to meet the needs of students who attend the city's lower-performing schools. The community schools model is an example of an approach to education that seeks to meet students' needs, in which families, communities, and schools partner to provide:

1. Expanded and enriched learning time, including after-school programs, summer programs, and culturally relevant, real-world learning opportunities;
2. Active family and community engagement, including service provision and meaningful partnership with students, families, and community members;
3. Collaborative leadership and practices, including coordination of community school services; site-based, cross-stakeholder leadership teams; teacher learning communities; and the ongoing sharing and use of early warning data; and
4. Integrated student support, mental and physical health care, nutrition support, and housing assistance, which are often provided through strategic community partnerships.¹⁵

Examples of this approach currently being employed in Gastonia and Gaston County include the Communities in Schools Gaston County program, which offers programming such as school supply drives, afterschool homework clubs, career fairs, community service, mentoring, and lunch and reading buddies in Gaston County Schools. Funding for similar programs that provide collaborative, integrated support for students can help increase access to proficient schools for residents who may lack the opportunity to move to higher-performing school zones.

¹⁵ Center for Universal Education at Brookings. (2021). Addressing education inequality with a next generation of community schools: A blueprint for mayors, states, and the federal government; Maier, Daniel, Oakes, and Lam. (2017). Community Schools as an Effective School Improvement Strategy: A Review of the Evidence. Learning Policy Institute and National Education Policy Center.

FIGURE 27. W.A. BESS ELEMENTARY SCHOOL, SOUTH GASTONIA



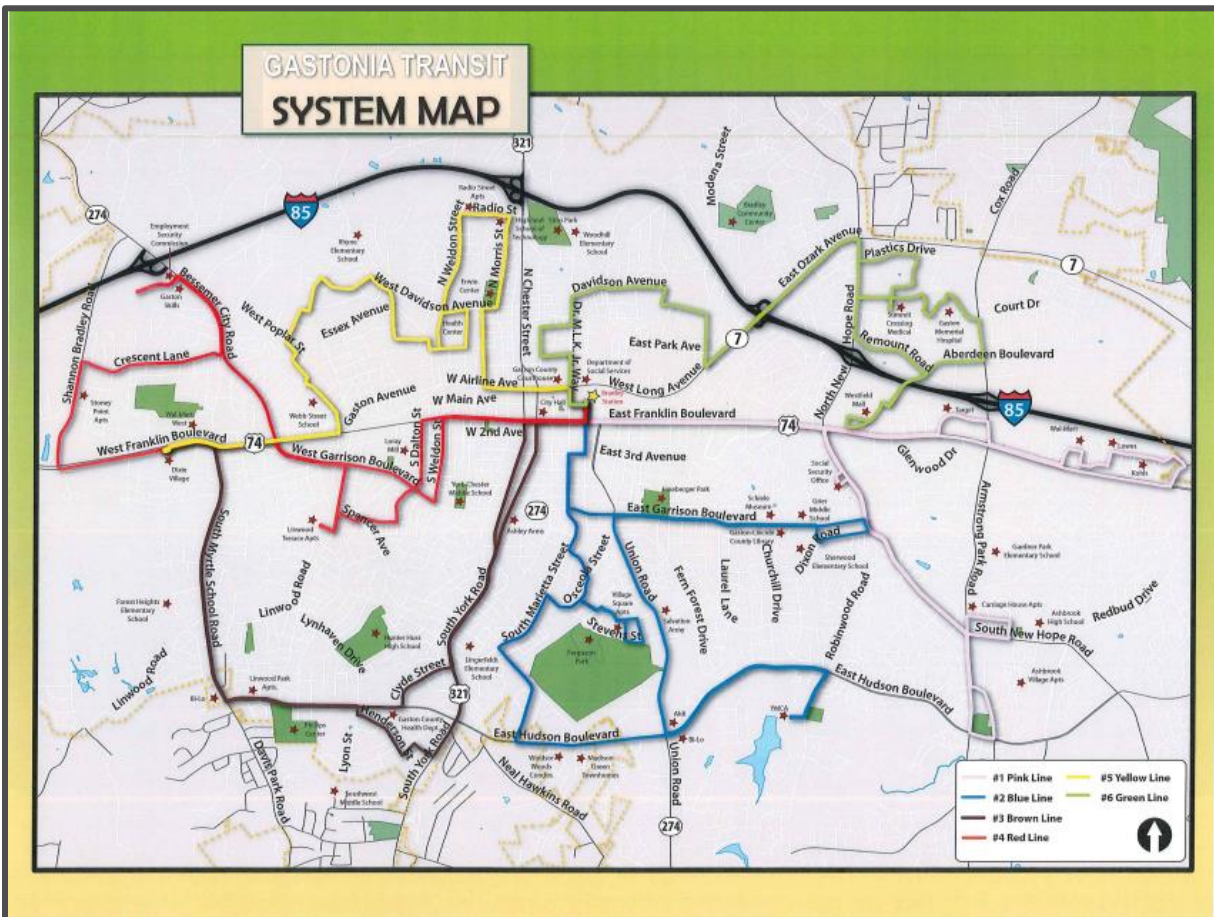
Transportation

Affordable, accessible transportation makes it easier for residents to access a range of opportunities—providing connections to employment, education, fresh food, healthcare, and other services. While low-cost public transit can facilitate access to these resources, a lack of access to affordable transportation poses barriers to meeting key needs, particularly in areas with low levels of walkability and a lack of access to vehicles.

Access to Affordable Transportation

The City of Gastonia operates a bus fleet of eight transit buses and three demand response vans. All buses and vans are designed to accommodate passengers with mobility impairments. The buses pass through the downtown terminal transfer station, Bradley Station. Gastonia Transit covers over 299,000 miles every year and provides service to an estimated 144,000 passengers. The bus service operates from 5:30 am to 6:30 pm Monday through Friday and 8:00 am to 6:00 pm on Saturday. Transit service is also provided through the Gaston County ACCESS Central Transportation department, which provides bus service throughout the county with 12 stops between Gastonia and Bessemer City. The bus service begins at 5:30 a.m. and ends at 4:30 p.m. at the Gastonia Transit Bradley Bus Station. However, trips to stops within $\frac{3}{4}$ mile of the routes can be arranged in advance by calling the department. There is a \$1 bus fare each way Monday through Friday. The Charlotte Area Transit System (CATS) also provides one route through Gastonia, the 85x Gastonia Express, which makes stops from the Gastonia Transit Center Park and Ride to the Abbey Plaza Shopping Center Park and Ride, Uptown Charlotte, and the Charlotte Transportation Center . CATS provides transit service to other small cities in northeast Gaston County such as Mt Holly that area the Charlotte metro area.

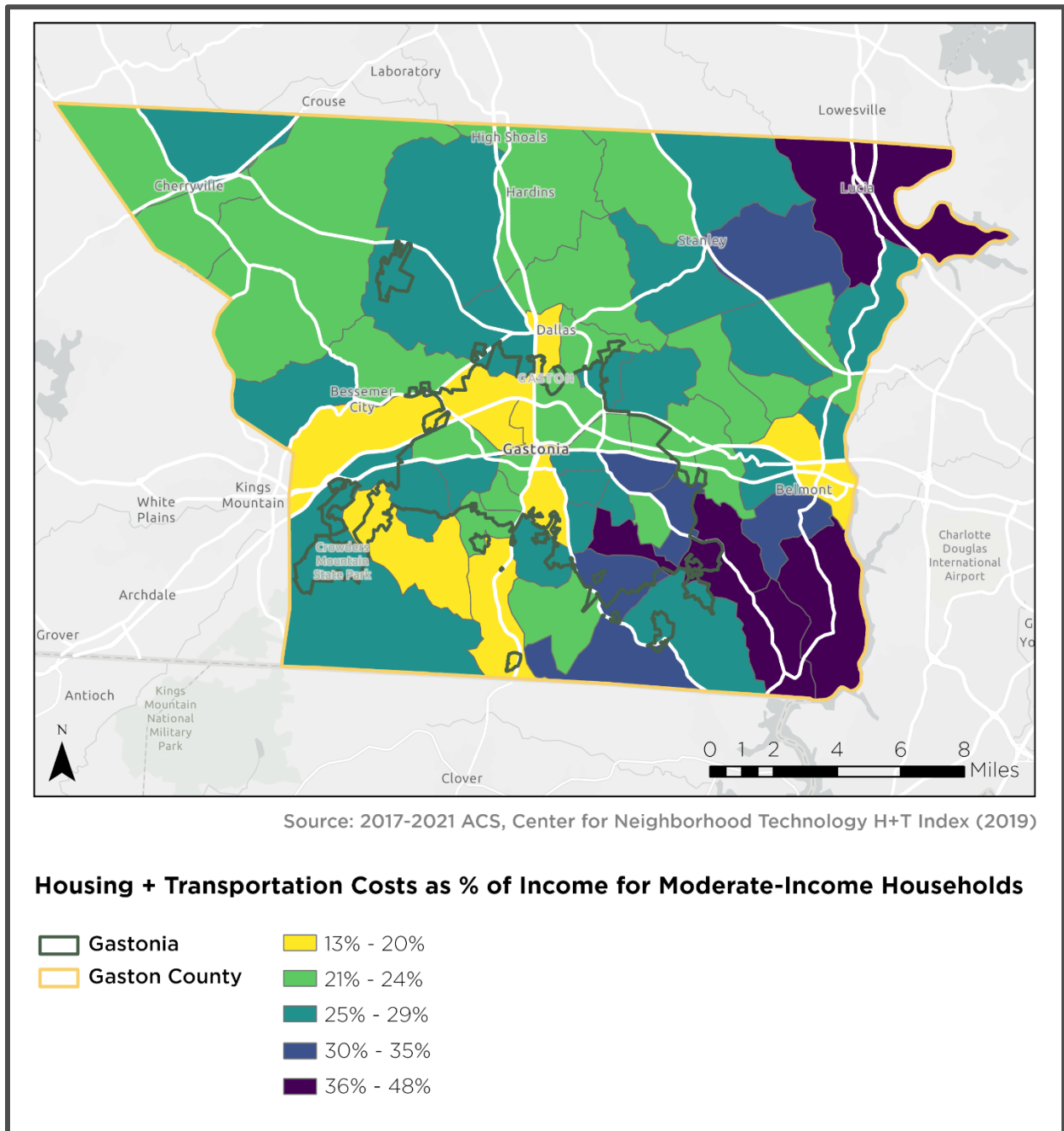
FIGURE 28. GASTONIA TRANSIT SYSTEM MAP



Source: City of Gastonia

Households in central Gastonia, which have higher levels of access to the Gastonia Transit System bus routes, spend the lowest amount on housing and transportation costs relative to household income. Combined housing and transportation costs tend to make up a greater share of income in north and southeast Gaston County, areas with lower levels of access to the city’s transit routes (see Figure 29). In areas outside of downtown and central Gastonia, the combination of reduced proximity to jobs and high proportions of residents’ incomes spent on transportation may present barriers to obtaining and maintaining employment and housing.

FIGURE 29. HOUSING AND TRANSPORTATION AFFORDABILITY

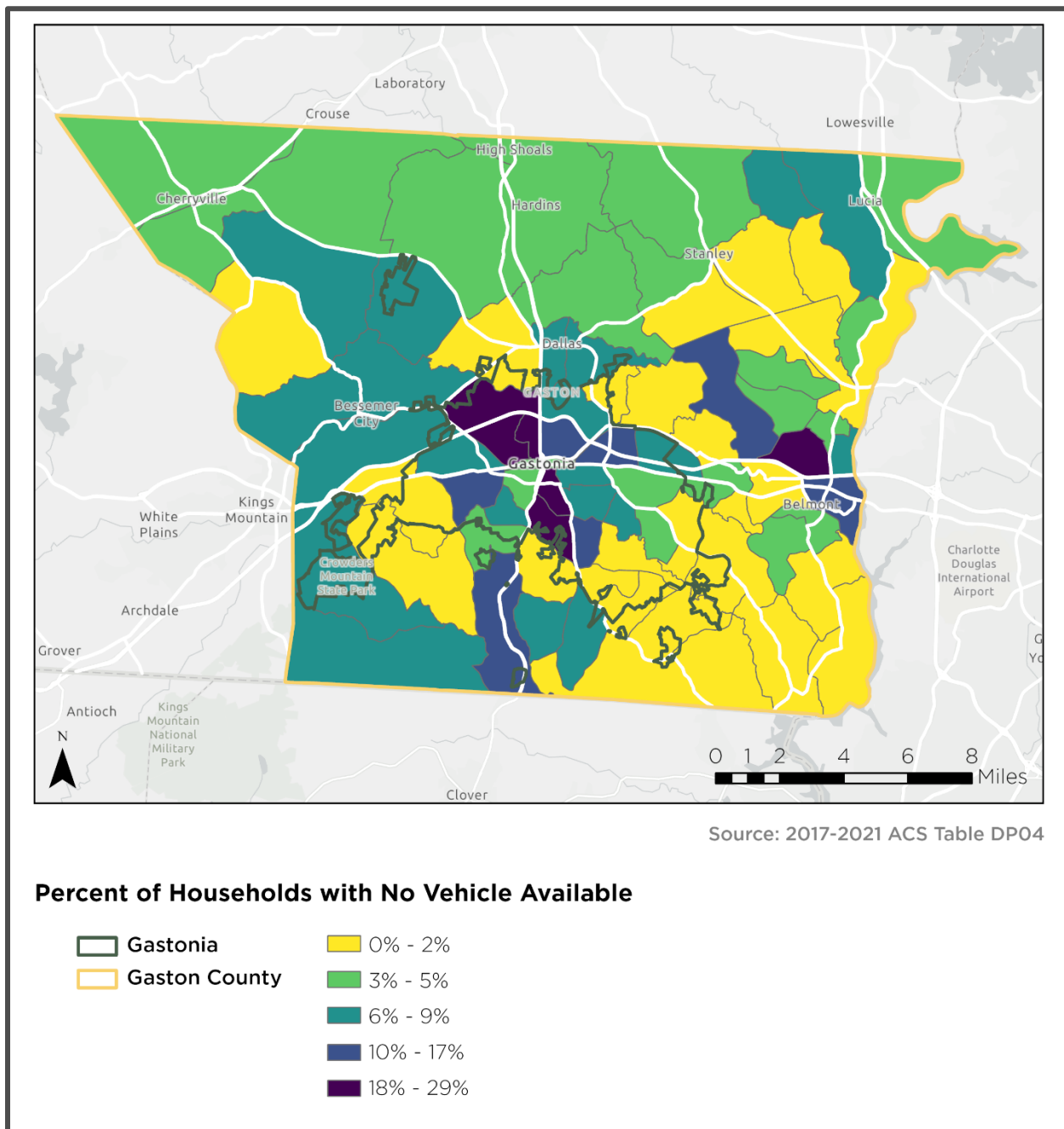


Vehicle Access

Access to vehicles also shapes residents' ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. An estimated 8.0% of households in Gastonia do not have access to a vehicle, according to American Community Survey five-year estimates for 2017 to 2021. While vehicle access is high overall, disparities exist by geography and reflect the need for access to public transit in the city. Residents of central Gastonia tend to have vehicles at the lowest rates. In contrast, in southeast Gastonia, fewer than 2% of households do not have access to vehicles (see Figure 30). Other areas of the county with lower rates of vehicle access, such as north and southwest Gaston County, are further from the city's transit system routes, reflecting a need for additional bus routes or alternative transportation services, such as on-demand rides, throughout Gaston County.

Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and with limited access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where public transportation is available. The combination of high levels of vehicle ownership and high transportation costs as a percentage of household income in areas that are not well served by public transit reflects a need for transportation options that reduce household transportation costs in these areas.

FIGURE 30. VEHICLE ACCESS



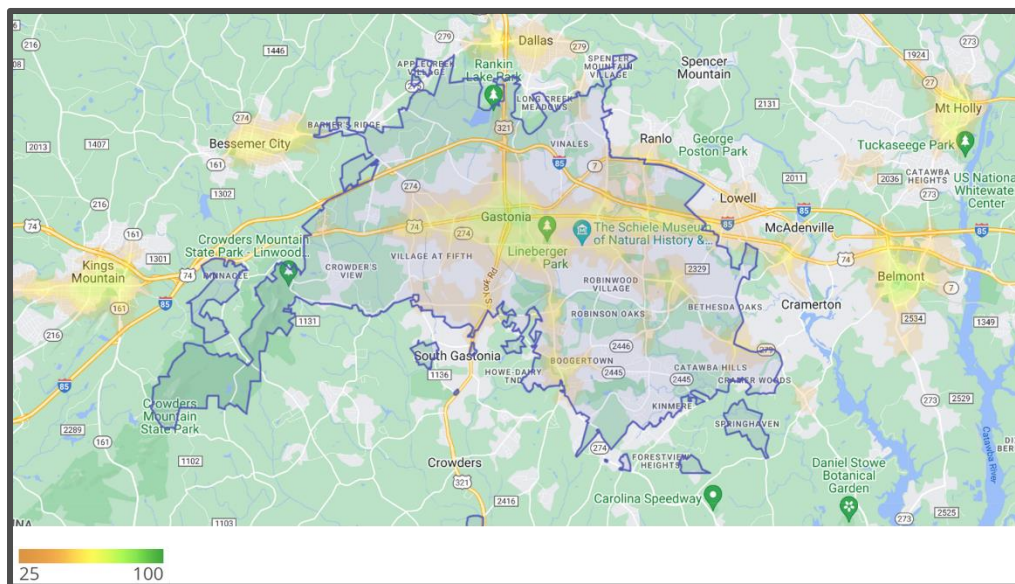
Walkability and Bicycle Connections

Along with access to transit, low-cost transportation, and vehicles, walkability shapes the extent to which residents are able to access employment, resources, and services. While the city is generally car-dependent, parts of downtown and central Gastonia have moderate to high levels of walkability

(shown in green and yellow in Figure 31). Residents and stakeholders also emphasized that many areas of the city lack accessible sidewalks or lighting, making accessing resources and services via walking more difficult and less safe, particularly for residents with disabilities. Residents and stakeholders noted that newer neighborhoods in the area are often built without sidewalks.

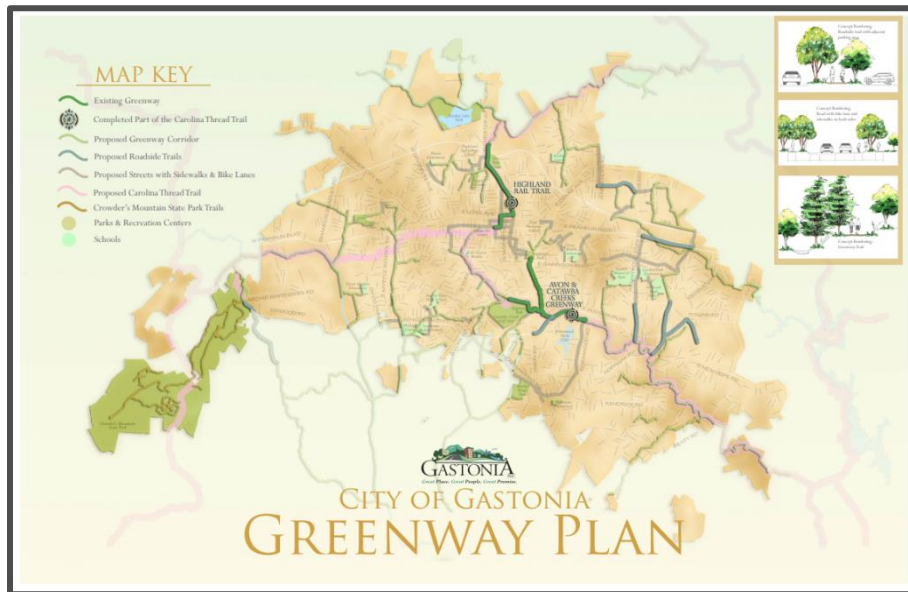
In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability. 70.4% of survey respondents noted that roads and sidewalks are not equally provided throughout Gastonia. Overall low levels of walkability in the city combined with low levels of access to public transit in some areas point to challenges for residents without access to vehicles in connecting to employment, resources, and services. Currently, the county has 132 miles of existing sidewalk and a few bicycle routes (see Gaston County Bicycle Map). Five bike routes can be found in Gastonia, Bessemer City, Dallas, Mount Holly, Stanley, Cherryville, and the McAdenville/Belmont/Cramerton area. In Gastonia, there is currently one bicycle route between High Shoals and Crowder Mountain State Park. Additionally, the city has 4.6 miles of greenway trails as well as proposed trails and greenway corridors (see Figure 32).

FIGURE 31. WALKABILITY IN GASTONIA



Source: Walkscore

FIGURE 32. GREENWAY PLAN



Source: City of Gastonia

Residents and stakeholders who participated in this planning process noted that Gastonia does not have a good transit system, making it difficult for residents without access to vehicles to get around the city. Public transit covers only about 20% of the county, and the lack of connections between Gastonia and Charlotte or other communities creates challenges for businesses in obtaining and maintaining employees. 64.3% of survey respondents said that bus service is not equally provided throughout Gastonia and Gaston County.

Additionally, residents and stakeholders noted a need for better access to essential amenities and services throughout Gastonia. Several areas in the northwest and southwest, including the Highland neighborhood, are considered food deserts and lack retail establishments to meet basic needs. While some parts of the city have access to more retail options, residents noted several barriers to moving to these areas, including higher costs of housing, lack of access to wealth to purchase a home, lack of public transit to access employment, NIMBYism and opposition to affordable housing, and lack of housing supply. In this way, access to affordable public transportation is vital to ensuring access to basic needs, particularly for residents of neighborhoods that lack grocery stores, retail, and services. Residents with disabilities, in particular, may require housing units that are accessible to bus lines to access resources, services, and employment.

Ridesharing services or smaller buses may be opportunities to reduce transportation costs and make transit more efficient. Stakeholders noted that the City of Gastonia is considering City-sponsored micro-transit options, similar to Uber or Lyft. Residents noted a need for a ridesharing service because current bus hours are not ideal for workers with employment outside of 9 to 5 hours, as the bus does not run later hours.

Low-Poverty Neighborhoods

Poverty rates are highest in the northern and central portions of Gastonia, areas that include the City's RECAPs (see Figure 33). Five census tracts in these areas have poverty rates above 30%, although only four constitute R/ECAPs as the fifth is primarily inhabited by white residents. Black and Hispanic residents are slightly overrepresented in these high-poverty census tracts relative to their share of the county's overall population, while white and Asian residents are underrepresented.

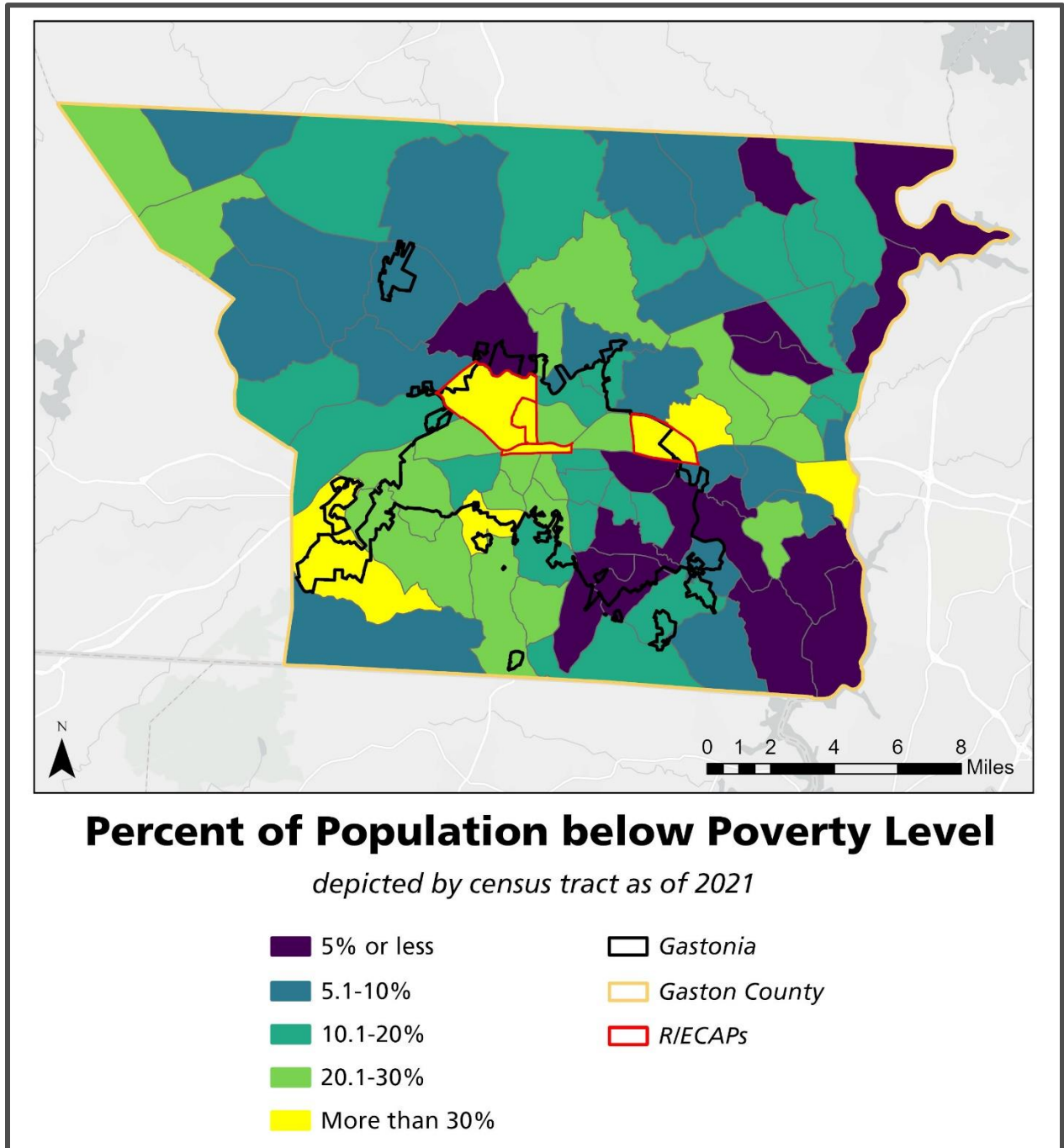
Census tracts with the lowest poverty levels are clustered almost exclusively in the southeastern part of Gastonia. Three census tracts here have poverty rates of 5% or less, in addition to one tract which just intersects with the northwestern corner of the City. There are no tracts in Gastonia that have a poverty rate of between 5 and 10%; all such tracts are located outside of the City limits in Gaston county.

Residents and stakeholders who participated in this planning process noted that housing choices for low-income residents in Gastonia are often limited to higher-poverty areas by:

1. A lack of landlords willing to accept Section 8 vouchers in lower-poverty areas;
2. An overall lack of enough Section 8 vouchers to meet demand;
3. A disconnect between HUD-defined fair market value and what people can actually afford;
4. A lack of Spanish language resources for LEP residents, who are more likely to be low-income;
5. A lack of connectivity in transit services which may limit residents without personal vehicles to neighborhoods with public transportation options;
6. A lack of job options offering high enough wages to afford an average apartment;
7. A lack of low-income housing for residents other than the elderly; and
8. A lack of elderly low-income housing built outside of low-income communities.

A general lack of affordable housing in Gastonia limits lower-income residents' housing choices to areas of with more affordable housing, which often coincide with areas that have higher poverty rates. For residents who do not have access to vehicles especially, housing choices are also often limited by inadequate transportation access in some areas of the county, infrequent bus service, and travel times to places of employment. In this way, residents who rely on public transportation often must live near the City's limited bus routes or their places of employment, or else face long commutes to jobs.

FIGURE 33. POVERTY RATES IN GASTONIA AND GASTON COUNTY, 2017-2021



Source: 2017-2021 ACS Table S1710

Environmental Quality

Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in counties, cities, and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.¹⁶

Access to Parks

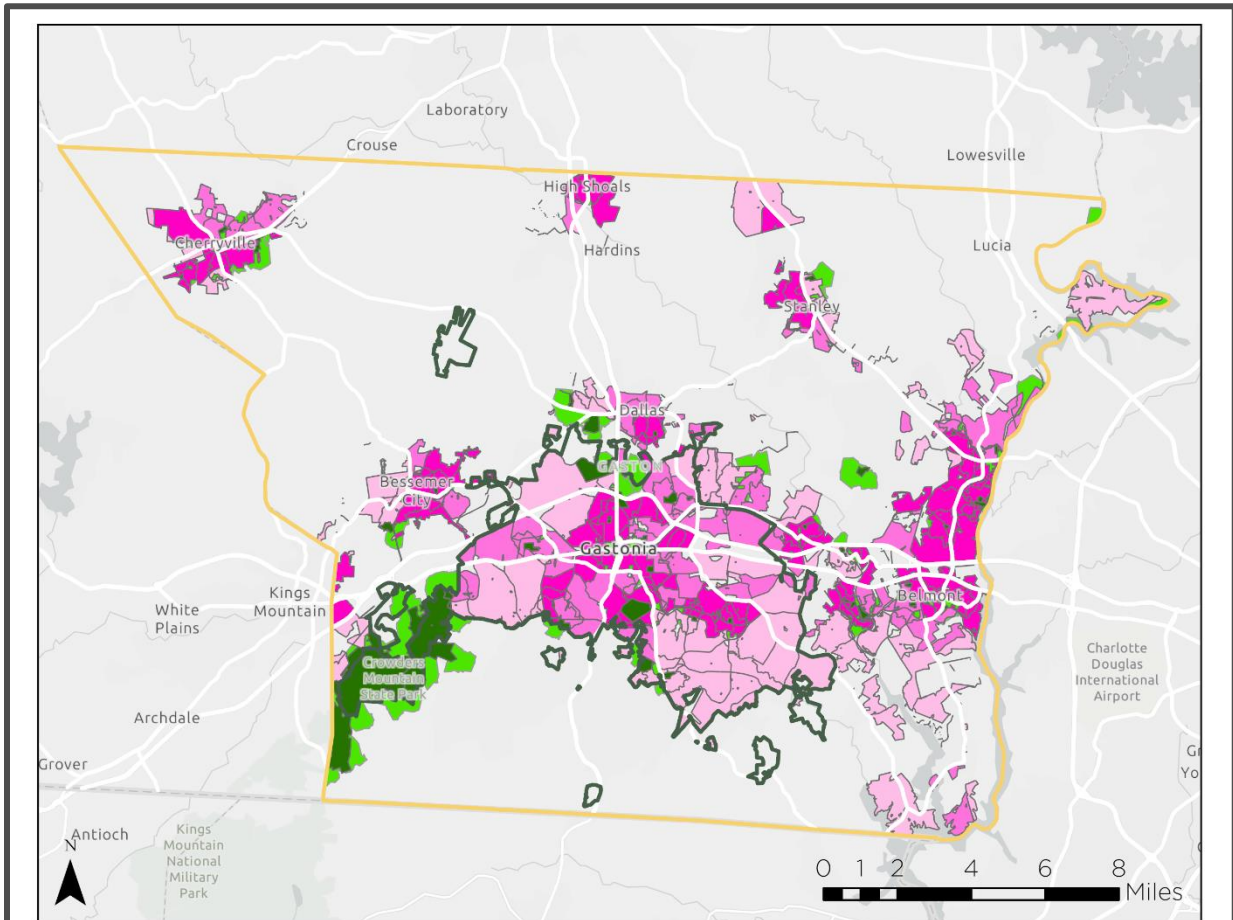
Parks are most accessible in central Gastonia, portions of which have some of the city's highest population densities. To the south-west of the city is the Crowders Mountain State Park which further increases accessibility for households in the area. In contrast, fewer parks exist in the north and far south parts of Gaston County (see Figure 35). Over 53.6% of survey respondents stated that parks and trails are not equally provided throughout Gastonia.

FIGURE 34. CROWDERS MOUNTAIN STATE PARK, SOUTHWEST GASTONIA



¹⁶ U.S. Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments. Retrieved from: <https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>

FIGURE 35. PARK ACCESS



Source: 2017-2021 ACS, Trust for Public Land ParkServe (2022)

Park Access and Priority Areas

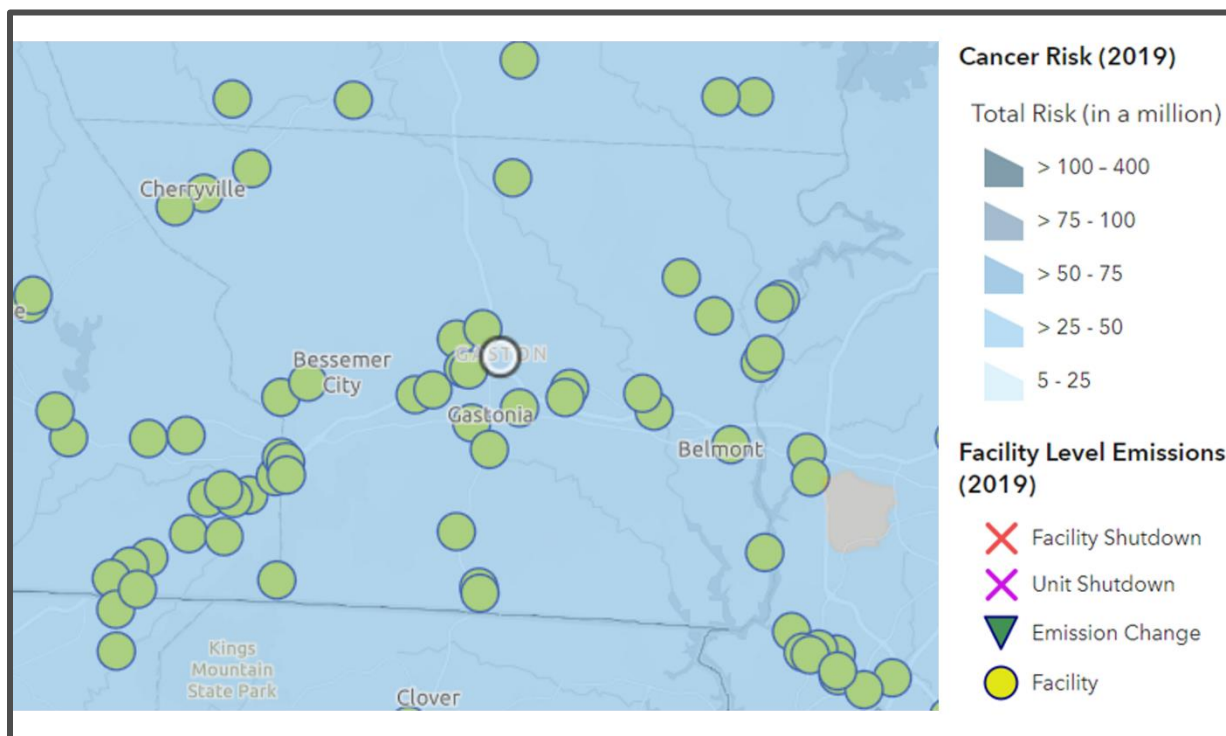
- Areas with Low Park Need
- Areas with Moderate Park Need
- Areas with High Park Need
- Areas within 10 Minute Walk of a Park
- Parks
- Gastonia
- Gaston County

Environmental Hazards

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and / or the environment. These sites are placed on the National Priorities List (NPL). There are two NPL sites in Gastonia: Davis Park Road TCE and Hemphill Road TCE. There are two additional NPL sites in Gaston County: Jadco-Hughes Facility and North Belmont PCE.

The EPA’s National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment uses data from 2017 to examine cancer risk from ambient concentrations of pollutants. Gaston County overall has low levels of cancer risk from air toxins, about 30 per million across the county. Point sources of emissions are clustered within and around the city limits of Gastonia (see Figure 36).

FIGURE 36. NATIONAL AIR TOXICS ASSESSMENT



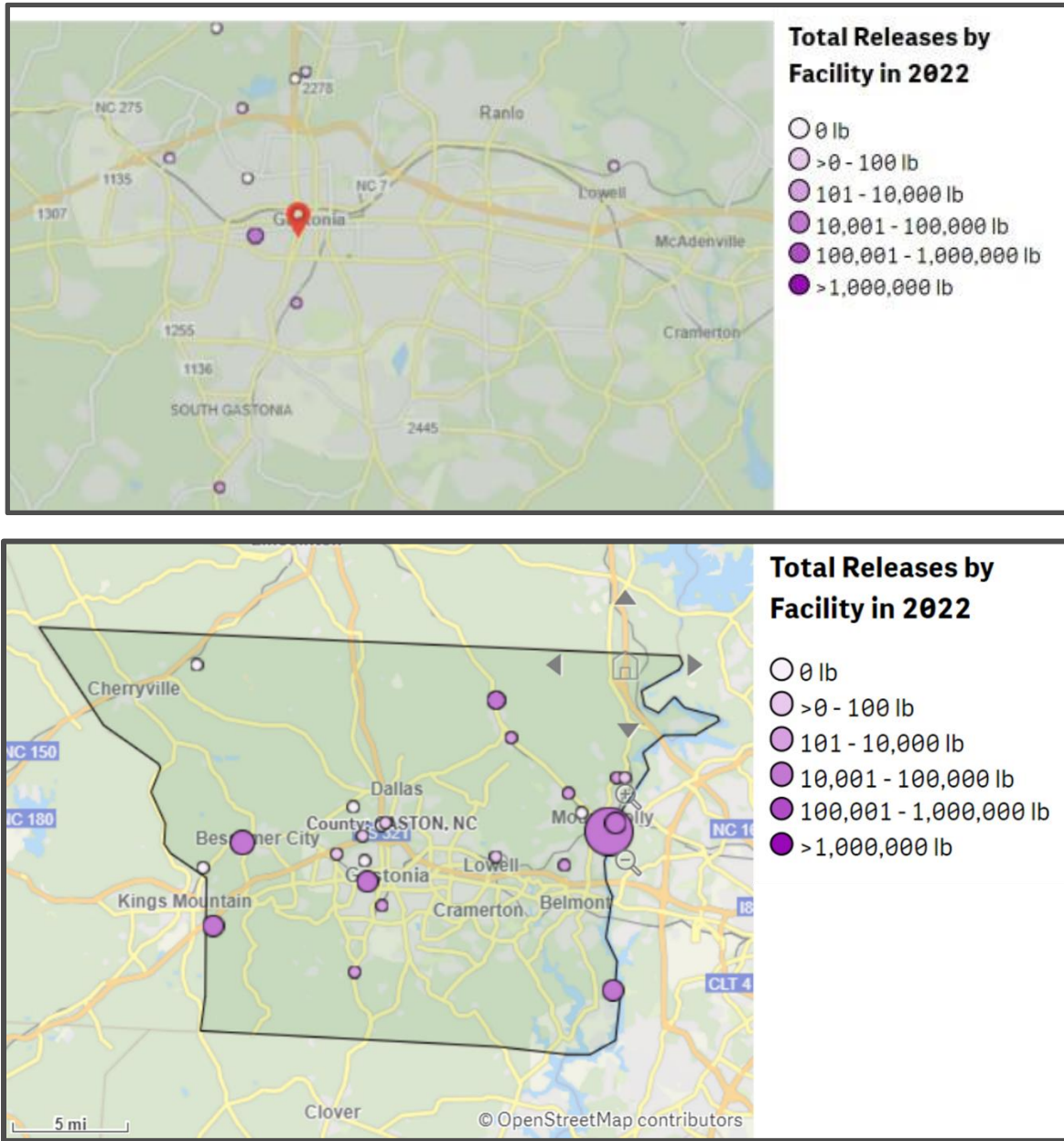
Source: United States Environmental Protection Agency Air Toxics Screening Assessment (2019).

Note: Green dots in the map above indicate Toxic Release Inventory (TRI) facilities. A facility is required to report to the TRI program if it meets chemical activity thresholds and is either in a covered industry sector and exceeds the employee threshold, or is specifically required to report based a determination by the Administrator under EPCRA 313(b)(2).

The Environmental Protection Agency's Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. The EPA's Risk-Screening Environmental Indicators (RSEI) Model analyzes TRI data on the amount of toxic chemicals released, together with risk factors such as the chemical's fate and transport through the environment, each chemical's relative toxicity, and the number of people potentially exposed, to calculate a numeric score designed to be compared to other RSEI scores.

Toxic release inventory sites in Gastonia are found throughout the west of the city. In particular, the Firestone Fires and Textiles CO in the Loray Mill Historic District has a RSEI score several times higher than those of other nearby facilities (see Figure 37), indicating greater health risks for residents living near this facility. In the overall Gaston County, the highest toxic release found is at the American & EFIRD LLC Plant 05 & 15 near Mount Holly, the Livent USA CORP in Bessemer City, the Firestone Fibers & Textiles CO near Kings Mountain, and the Duke Energy Carolina LLC Allen Steam Station near Belmont.

FIGURE 37. TOXIC RELEASE INVENTORY FACILITIES



Source: United States Environmental Protection Agency Toxic Release Inventory (2022).

Food

Many individuals and families face challenges in accessing food that is both healthy and affordable. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may pose particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher cost of healthy foods such as produce often present barriers to accessing healthy food.

USDA Food Research Atlas data indicates that the share of residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in north and southwest Gaston County. Tracts directly northeast and southeast of Gastonia also have a high share of residents who are low income and further from a grocery store (see Figure 38).

Survey respondents echoed concerns surrounding food access, with 67.9% noting that grocery stores and other shopping opportunities are not equally available in all neighborhoods. While residents and stakeholders generally noted that all neighborhoods of the city are accessible in a short drive by car, they emphasized an overall lack of retail and noted that limited public transportation routes and frequency make accessing need resources such as grocery stores challenging for residents without access to vehicles.

Poverty and limited access to vehicles also contribute to issues of food access and insecurity in the city. An estimated 12.6% of Gastonia residents were living below the federal poverty level as of the 2017 to 2021 American Community Survey five-year estimates, indicating that low incomes are a barrier for a substantial portion of residents in accessing fresh food. Disparities in poverty rates exist by race: an estimated 23.4% of American Indian/Alaska Native residents, 21.7% of Black/African American residents, 19.1% of residents of some other race, and 17.7% of Hispanic or Latino residents were living below the poverty level in the past 12 months from 2017 to 2021, while the share of non-Hispanic white residents living in poverty was 10.3%.

Further, low levels of vehicle access indicate that food access is particularly challenging for significant proportions of households in areas of the city with limited access to public transportation and low levels of walkability. In this way, the combination of uneven distribution of food outlets across the city, the substantial proportions of households with low incomes, and a lack of access to vehicles create barriers to food access and security.

FIGURE 38. FOOD ACCESS IN GASTONIA AND GASTON COUNTY, 2019

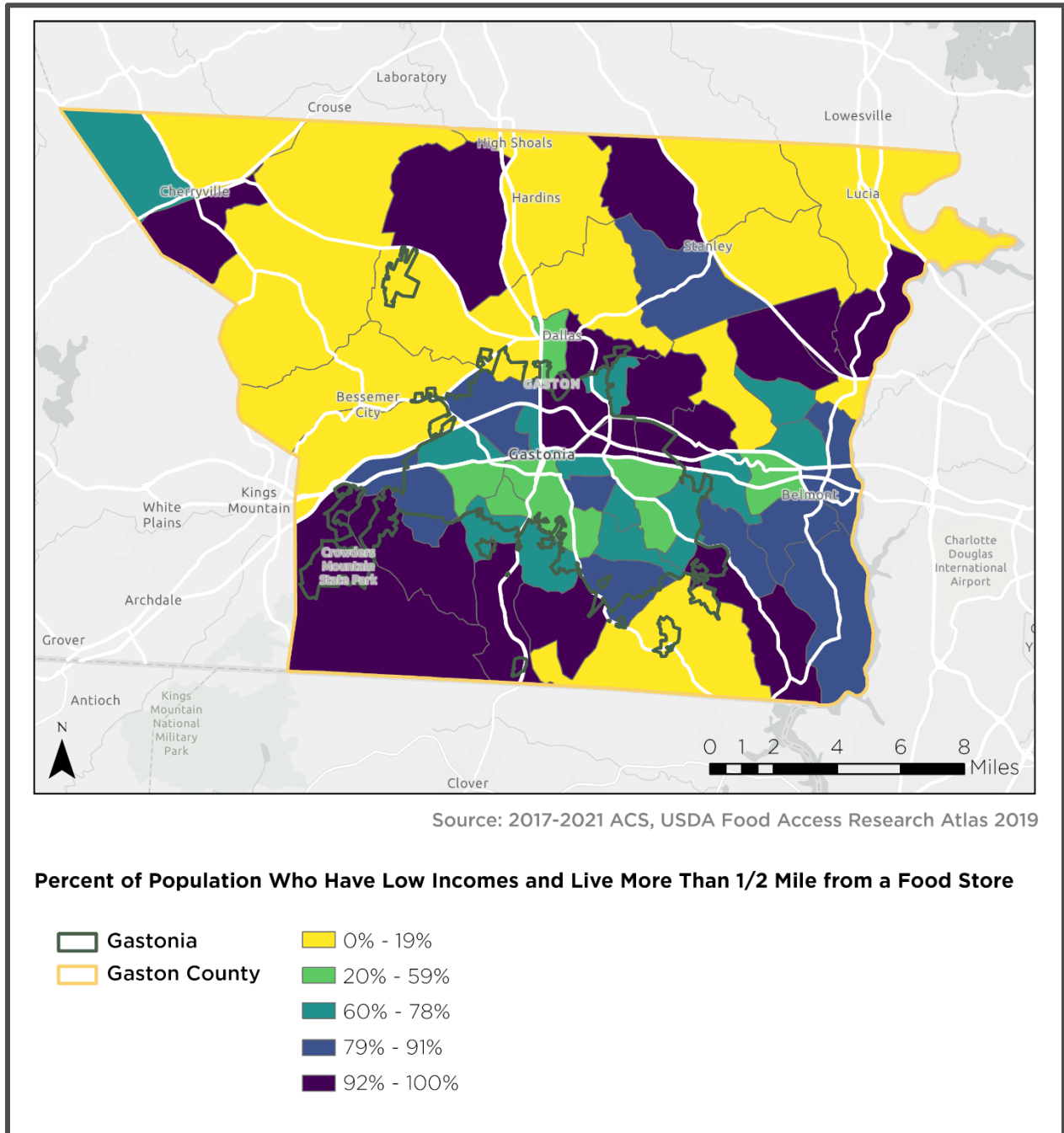


FIGURE 39. HARRIS TEETER, SOUTH GASTONIA



Healthcare

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length of life and quality of life. Sufficient availability of primary care physicians is essential for preventive and primary care, and for referrals to appropriate specialty care when needed. Residents of Gaston County have access to healthcare providers at a rate of one primary care physician per 1,780 residents, one dentist per 1,860 residents, and one mental health provider per 370 residents. These figures indicate lower availability of healthcare providers in the county than in the state of North Carolina and United States overall (see Table 7).

TABLE 7. RATIO OF POPULATION TO HEALTHCARE PROVIDERS, GASTON COUNTY, 2020-2022

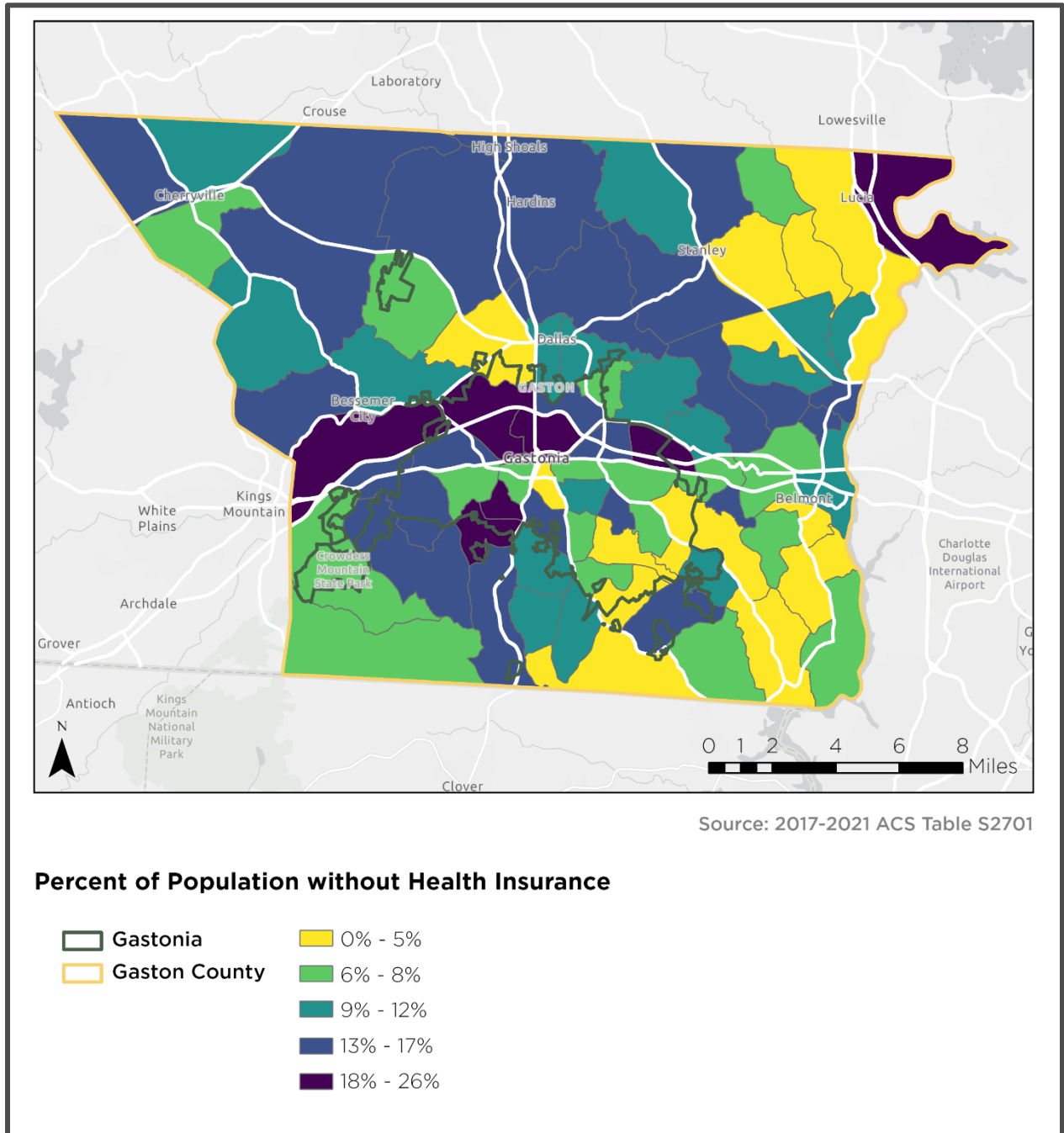
Care Provider	Gaston County	North Carolina	United States
Primary Care Physicians	1,780:1	1,410:1	1,310:1
Dentists	1,860:1	1,660:1	1,380:1
Mental Health Providers	370:1	340:1	340:1

Data Sources: County Health Rankings, Area Health Resource File / American Medical Association, 2023.

Lack of health insurance coverage is also a barrier to accessing needed healthcare—including preventive care—and to maintaining financial security. While the share of residents with health insurance in the city overall has increased to 89.5% as of the 2017 to 2021 American Community Survey five-year estimates, shares of uninsured residents continue to vary by location across the city. Residents of part of north Gastonia tend to be uninsured at the highest rates (as high as 26% of the tracts’ populations), while residents of south Gastonia are most likely to have health insurance (9% to 12% uninsured residents in these tracts, see Figure 40). The east and far south-east tracts of Gaston County overall are likely to have health insurance with as low as 0% to 5% of uninsured residents.

Overall, healthcare access is shaped by multiple factors, including availability of providers, health insurance coverage, and access to vehicles or other transportation options. Investments in programs designed to increase access to healthcare may help increase access for underserved residents. Because of geographic disparities in health insurance coverage, efforts such as increasing enrollment in Medicaid and Marketplace health insurance plans and providing access to low-cost health services may most effectively address goals of improving access to healthcare by focusing efforts in census tracts with high proportions of uninsured residents and of residents living below the poverty level, which are clustered in the northern tracts of Gastonia and within the R/ECAPs region.

FIGURE 40. ACCESS TO HEALTH INSURANCE



Housing Profile

Background

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which results in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.¹⁷ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.¹⁸ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.¹⁹

This section discusses the existing supply of housing in Gastonia and Gaston County. It also reviews housing costs in the city, county, and region, as well as housing condition, homeownership rates and access to lending for home purchases.

¹⁷ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

¹⁸ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>.

¹⁹ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

Housing Supply Summary

The Charlotte-Concord-Gastonia, NC-SC MSA has approximately 1,090,365 housing units, of which an estimated 97,109 are in Gaston County, and 34,363 are in the city of Gastonia.²⁰ While all three areas have experienced significant growth in housing units in recent years, the MSA's housing stock grew at the fastest rate (11.9%), followed by that of Gastonia (10.0%) and Gaston County (8.3% increase) during the time period covered by the 2012-2016 American Community Survey five-year estimates (centered in 2014) to the 2017-2021 estimates (centered in 2019).

The American Community Survey's definition of vacancy includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Using this definition, the vacancy rate in Gastonia is estimated to be around 9.8% as of the 2017-2021 American Community Survey, down from 12.4% in 2012-2016. Gaston County's vacancy rate is estimated at 8.6%, down from 11.4% in 2012-2016. Vacancies in the wider metro area occur at a similar rate as in Gaston County (8.1%). These rates are lower than that of the state of North Carolina overall (13.7% as of the 2017-2021 ACS).

Shares of for-sale homeowner units are particularly low, pointing to tight housing markets and high demand for homeownership. The share of owner units that are vacant and for sale (homeowner vacancy rate) is just 0.6% in Gastonia, 0.7% in Gaston County, and 1.0% in the MSA. The share of renter units that are vacant and for rent (renter vacancy rate) is 8.9% in Gastonia, 6.3% in Gaston County, and 6.4% in the MSA, indicating greater availability of rental housing in Gastonia relative to the county and MSA. About 3% to 5% of units in the city, county, and MSA are vacant for reasons other than being available for sale or rent, being rented or sold but not yet occupied, or use as seasonal housing. These reasons include need for rehabilitation or repair, foreclosure, legal proceedings, abandonment, and other reasons. Despite differences in vacancy rates among the city, county, and MSA, all three areas have seen declines in vacant housing units, indicating high demand for housing and increasingly tight housing markets. The following analysis examines several features of housing supply, including structure type, size, tenure, and age of housing.

²⁰ 2017-2021 American Community Survey five-year estimates

TABLE 8. HOUSING UNITS BY OCCUPANCY STATUS

	2012-2016	2017-2021	% Change
GASTONIA, NC			
TOTAL HOUSING UNITS	31,247	34,363	10.0%
Occupied Housing Units	27,362	30,991	13.3%
Vacant Housing Units	3,885	3,372	-13.2%
Vacancy Rate	12.4%	9.8%	-21.0%
GASTON COUNTY			
TOTAL HOUSING UNITS	90,212	97,109	7.6%
Occupied Housing Units	79,904	88,710	11.0%
Vacant Housing Units	10,308	8,399	-18.5%
Vacancy Rate	11.4%	8.6%	-24.6%
CHARLOTTE-GASTONIA-CONCORD, NC-SC MSA			
TOTAL HOUSING UNITS	974,598	1,090,365	11.9%
Occupied Housing Units	885,916	1,001,934	13.1%
Vacant Housing Units	88,682	88,431	-0.2%
Vacancy Rate	9.1%	8.1%	-11.0%
<i>Data Sources: 2012-2016 and 2017-2021 5-Year ACS, Tables B25002, B25004</i>			

Housing Structure

Jurisdictions with a variety of housing structure types are better able to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 9 shows housing units by structure types in Gastonia, Gaston County, and the Charlotte-Gastonia-Concord, NC-SC MSA. Single-family detached homes are the predominant housing type, making up about 67% to 73% of housing units in all three jurisdictions. In Gastonia, units in small multifamily buildings of five to 19 units are the next most common (15.0%), followed by units in duplexes, triplexes, and quadruplexes (7.6%). Large multi-family developments with 20 or more units account for 3.9% of units, while single-family attached units comprise 2.8% of units. Mobile homes comprise an estimated 1.7% of units in the city. Relative to the county and the region, the city has a larger share of units in ‘missing middle’ housing types of two to 19 units (22.6% compared to 12.8% in the county and 13.3% in the MSA).

In Gaston County, mobile homes account for the second largest share of all housing units (8.9%), followed by units in small multi-family developments (7.7%) and units in duplexes, triplexes, and quadruplexes (5.2%). Units in large multifamily developments and single-family attached structures each account for 2.5% of the county’s units.

Relative to the city and county, the region has greater shares of units in large multifamily structures of 20 or more units (7.6%) and in single-family attached structures (5.4%).

The high shares of single family-detached structures in all three jurisdictions may pose limitations on residents in obtaining housing in units of other housing types, including ‘missing middle’ housing, such as duplexes, triplexes, quadruplexes, units in small apartment buildings, or other housing types that may provide opportunities for increased affordability, variety in housing unit size, or specific amenities or opportunities for social connection. When neighborhoods contain a concentration of similar housing types, residents may find it difficult to obtain housing that meets their needs or to remain in their neighborhoods of choice as they experience life changes.

TABLE 9. HOUSING UNITS BY STRUCTURE TYPE

Units in Structure	GASTONIA		GASTON COUNTY		CHARLOTTE-GASTONIA-CONCORD MSA	
	#	%	#	%	#	%
1, detached	23,722	69.0%	71,148	73.3%	729,137	66.9%
1, attached	948	2.8%	2,384	2.5%	59,386	5.4%
2 to 4	2,601	7.6%	5,016	5.2%	38,579	3.5%
5 to 19	5,151	15.0%	7,448	7.7%	106,427	9.8%
20 or more	1,338	3.9%	2,438	2.5%	82,849	7.6%
Mobile home	592	1.7%	8,607	8.9%	73,648	6.8%
Other (RV, boat, van, etc.)	11	0.0%	68	0.1%	339	0.0%
TOTAL	34,363	100%	97,109	100%	1,090,365	100%

Data Sources: 2017-2021 5-Year American Community Survey, Table B25024.

Housing Tenure and Size (by Number of Bedrooms)

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. However, market forces and affordability impact housing choice and the ability to obtain housing of a suitable size. Markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 10 details housing units by the number of bedrooms and resident tenure (renters or homeowners). In Gastonia, Gaston County, and the Charlotte-Gastonia-Concord, NC-SC MSA, the vast majority (about 82% to 87%) of owner-occupied units have three or more bedrooms. Another 12% to 17% of owner-occupied units have two bedrooms. Studio and one-bedroom units are the least common owner-occupied units in all three jurisdictions, comprising slightly more than 1% of units.

Compared to owner-occupied units, rental units tend to have fewer bedrooms. Two-bedroom units are the most common renter-occupied housing size, comprising about 40% to 47% of units in the city, county, and MSA. Three-bedroom units are the next most common, comprising about 27% to 30% of renter-occupied units across the three areas. Studios and one-bedroom units are significantly more common among renter-occupied units than homeowner units, making up about 22% to 23% of renter-occupied units in the city and MSA, and 17.7% of renter-occupied units in the county. Units with four or more bedrooms make up about 4% to 7% of all rented units in the three areas.

The low shares of owner-occupied units with zero to two bedrooms across the jurisdictions points to challenges for homebuyers seeking smaller housing units that may provide increased levels of affordability and have lower maintenance costs. Renter households with large families, to the contrary, may experience challenges securing housing with more than three bedrooms.

TABLE 10. HOUSING UNITS BY SIZE AND TENURE

Number of Bedrooms	GASTONIA		GASTON COUNTY		CHARLOTTE-GASTONIA-CONCORD, NC-SC MSA	
	#	%	#	%	#	%
OWNER-OCCUPIED HOUSING UNITS						
Zero or One	203	1.2%	810	1.4%	7,502	1.1%
Two	2,289	13.7%	9,679	16.6%	80,368	12.2%
Three	9,574	57.2%	34,504	59.2%	338,294	51.2%
Four +	4,671	27.9%	13,284	22.8%	235,018	35.5%
TOTAL	16,737	100.0%	58,277	100.0%	661,182	100.0%
RENTER-OCCUPIED HOUSING UNITS						
Zero or One	3,175	22.3%	5,394	17.7%	79,835	23.4%
Two	6,588	46.2%	14,930	47.3%	138,938	40.8%
Three	3,913	27.5%	9,135	30.0%	96,990	28.5%
Four +	578	4.1%	1,515	5.0%	24,989	7.3%
TOTAL	14,254	100.0%	30,433	100.0%	340,752	100.0%
<i>Data Sources: 2017-2021 5-Year American Community Survey, Table B25042.</i>						

NOTE: Total is the total number of occupied housing units in each geography. Unoccupied units are not included in this table because tenure data is not available for these units.

Age of Housing

An assessment of the region's housing conditions can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of housing can have a substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Homes built prior to 1950 have a high likelihood of containing lead-based paint. However, the use of lead-based paint did not end until 1978 and may affect an even larger number of Gastonia and Gaston County households.

Development of new market-rate and subsidized housing units can support housing affordability and reduce displacement of lower-income residents. In contrast, areas with growing populations in which few new housing units are built tend to experience housing shortages and reduced affordability. Subsidized units, such as those built with low-income housing tax credits and other federal and state subsidies, have been found to be particularly protective in reducing displacement.²¹

Data on age of housing in Gastonia, Gaston County, and the Charlotte-Gastonia-Concord, NC-SC MSA points to an older housing stock in the city and county relative to the region and a decline in construction of new units since 2010 in both Gastonia and Gaston County. An estimated 12.7% to 12.8% of units in Gastonia and Gaston County are in structures built in 1949 or earlier, compared to just 7.0% of units in the region. About 37% to 41% of units in the city and county were built between 1950 and 1979, while just 24.8% of units in the MSA were constructed during that period. The MSA contains a greater share of newer housing, with 68.2% of units built in 1980 and later, compared to just 46.0% in the city and 50.1% in the county. Similarly, 13.8% of units in the region (150,875 units) were built in 2010 or later, compared to only about 8% of units in the city and county (2,856 units and 7,659 units, respectively). The older housing stock in Gastonia and Gaston County may pose both economic and public health challenges, particularly for individuals and families living in older housing units.

²¹ Zuk, M. and Chapple, K. (2016). Housing Production, Filtering and Displacement: Untangling the Relationships. Berkeley Institute of Governmental Studies. Retrieved from: https://www.urbandisplacement.org/wp-content/uploads/2021/08/udp_research_brief_052316.pdf

TABLE 11. NUMBER OF UNITS BY YEAR STRUCTURE BUILT

Year Structure Built	GASTONIA		GASTON COUNTY		CHARLOTTE-GASTONIA-CONCORD, NC-SC MSA	
	#	%	#	%	#	%
2010 to present	2,856	8.3%	7,659	7.9%	150,875	13.8%
2000 to 2009	4,548	13.2%	14,760	15.2%	246,028	22.6%
1990 to 1999	3,898	11.3%	13,099	13.5%	206,474	18.9%
1980 to 1989	4,497	13.1%	13,086	13.5%	140,270	12.9%
1970 to 1979	5,193	15.1%	13,916	14.3%	117,227	10.8%
1960 to 1969	4,661	13.6%	12,229	12.6%	84,495	7.7%
1950 1959	4,330	12.6%	9,912	10.2%	68,779	6.3%
1949 or earlier	4,380	12.7%	12,448	12.8%	76,217	7.0%
TOTAL	34,363	100.0%	97,109	100.0%	1,090,365	100.0%

Data Sources: 2017-2021 5-Year American Community Survey, Table B25034.

Other Housing Supply Needs

Residents and stakeholders who participated in this planning process noted a variety of housing needs in the city and county, including:

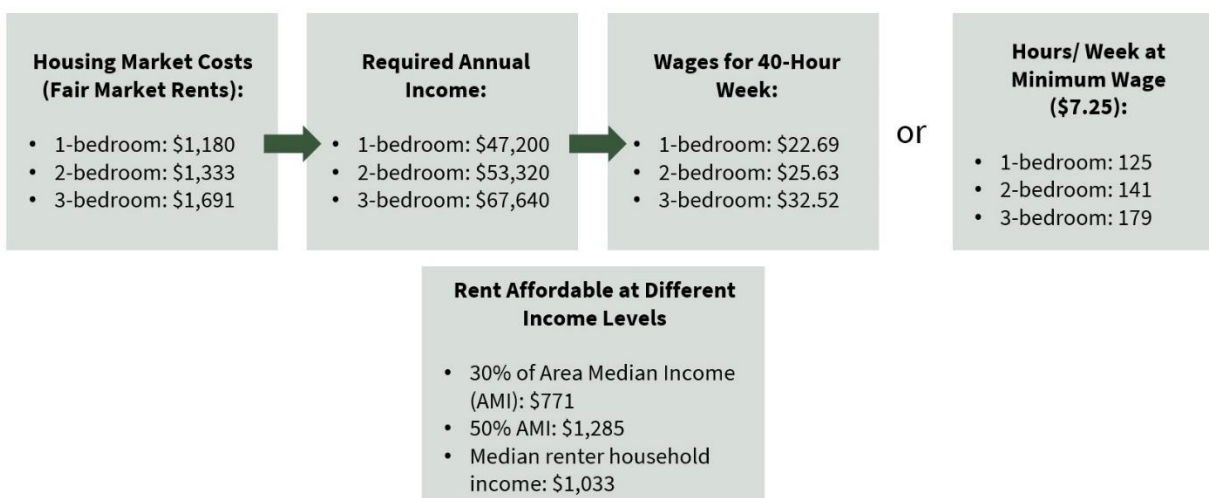
- a need for the City to partner with affordable housing developers to build new affordable units on vacant city-owned properties;
- affordable multifamily rental housing;
- adaptive reuse of large buildings to create affordable housing;

- development of housing that is permanently affordable to residents earning 50% of the Area Median Income;
- gap funding to support development of affordable housing;
- increased availability of Housing Authority units;
- development of housing designed to support greater affordability and reduce housing cost burdens, including smaller housing units, tiny homes, and shared housing options in which two or more households live together and share housing expenses;
- housing for residents transitioning from homelessness, including emergency, transitional, and permanent housing options with supportive services;
- housing accessible to residents with disabilities in a variety of unit sizes;
- cohousing for residents with intellectual or developmental disabilities with shared supportive services;
- permanent supportive housing with wraparound services for people with mental health or substance abuse issues in a community environment;
- access to services to support residents in accessing employment, such as affordable childcare;
- programs to support access to homeownership, including financial literacy programs and downpayment/ closing cost assistance;
- increased flexibility with requirements such as security and rent deposits;
- skills training for and connections to higher-wage jobs to reduce housing cost burden;
- increased awareness of existing housing resources and opportunities;
- education on the importance of affordable housing;
- adjustments to the zoning code to facilitate more missing middle or multifamily housing development without need for a public hearing;
- simplification and consolidation of apartment application processes to reduce fees;
- and limiting investor ownership of housing.

Housing Costs and Affordability

The availability of housing that is both affordable and in good condition was a common need identified by stakeholders, particularly for low- and moderate-income households. The National Low Income Housing Coalition’s annual Out of Reach report examines rental housing rates relative to income levels for counties throughout the U.S. The figure below shows annual household income and hourly wages needed to afford Fair Market Rents in Gaston County.

FIGURE 41. REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS, GASTON COUNTY, 2023



Source: National Low Income Housing Coalition Out of Reach 2023 (nlihc.org)

NOTE: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. The minimum wage in Gaston County is \$7.25. Median renter household income in Gaston County is \$41,326. Data are for Gaston County including the city of Gastonia.

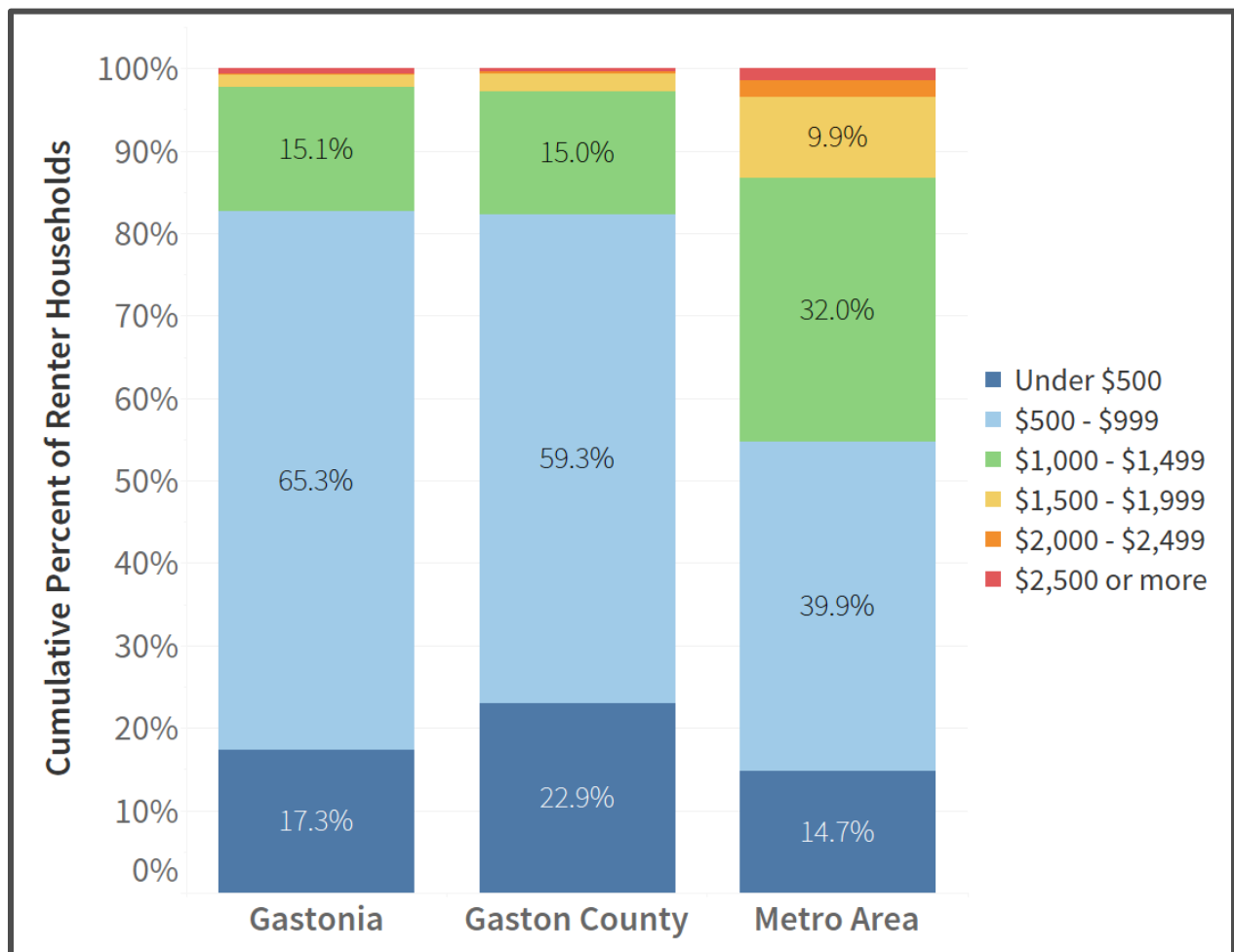
To afford a two-bedroom rental unit—the county’s most common rental type—without being cost burdened, a renter household would need to earn an annual income of \$53,320, which translates to a 40-hour work week at an hourly wage of \$25.63. It would take a 141-hour work week at the minimum wage of \$7.25 to afford the same two-bedroom unit. According to the Out of Reach Report, the median renter household income is \$41,326, which is lower than the necessary annual income to afford a one-bedroom unit at fair market rent.²²

The American Community Survey also provides estimates on monthly renter and homeowner costs. This data indicates that housing in the city and county tends to be more affordable relative to that

²² The average renter wage was derived by the National Low Income Housing Coalition from the Bureau of Labor Statistics’ Quarterly Census of Employment and Wages data for the purpose of evaluating local housing affordability.

in larger metro area. As of the 2017-2021 American Community Survey five-year estimates, about 82% to 83% of renter households in Gastonia and Gaston County spend less than \$1,000 per month on rent, compared to just over half (54.6%) of renter households in the metro. Households in the metro as a whole are more likely than those in the city and county to spend \$1,000 to \$1,999 on rent (41.9% of households, compared to about 17% in the city and county). While this data points to greater affordability in the city and county relative to the metro, more recent data from the Zumper database shows average rents in Gastonia at \$1,198 for a two-bedroom unit and \$1,739 for a three-bedroom unit as of October 2023, indicating sharp increases in rental costs in recent years. Renters earning the median renter household income may thus find it difficult to find housing in Gastonia and Gaston County at an affordable rate for their income level.

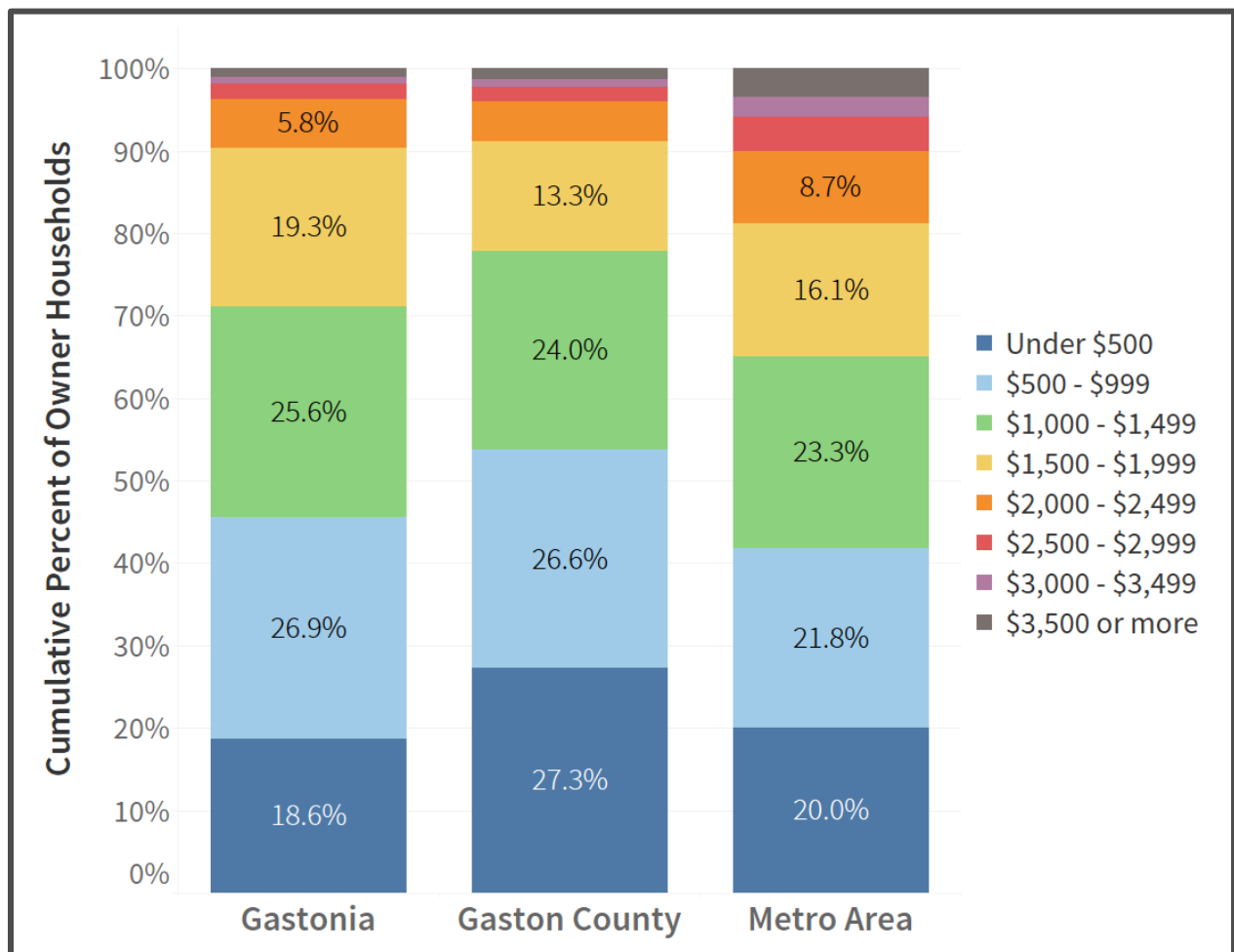
FIGURE 42. CONTRACT RENT, 2017-2021



For many Gastonia and Gaston County households, homeownership is more expensive than renting. As of the American Community Survey five-year estimates for 2017-2021, an estimated 28.8% of city homeowners and 22.1% of county homeowners spend \$1,500 or more per month on housing—a larger share than the estimated 2% to 3% of renter households spending within this

same range. Owner households in the city and county are also significantly more likely to spend \$2,000 or more per month on housing costs than renters (about 9% to 10% of homeowner households, compared to less than 1% of renter households). More recent data from Zillow’s Home Value Index (ZHVI) estimates the typical home value in Gastonia at \$275,437 as of September 2023, an 82.1% increase over the typical home value of \$151,226 in September 2018. While these values indicate greater affordability in the city and county relative to the metro area, where the typical home value topped \$370,000 as of September 2023, they indicate steep increases in home prices in recent years and barriers to homeownership for lower-income residents. As home values and interest rates have increased, renting is generally more accessible to low-to-moderate income families than homeownership in Gastonia and Gaston County.

FIGURE 43. MONTHLY OWNER COSTS



These findings align with input from stakeholders, who noted that housing costs have risen sharply in recent years. Residents and stakeholders emphasized the limited supply of housing in the city and county, which impacts the overall availability of affordable units. Respondents to the housing and community needs survey indicated that the top three housing needs are affordable housing,

first-time homebuyer assistance, and landlords/ communities that accept Section 8 vouchers. Residents indicate a need for housing that is both affordable *and in good condition*. Housing needs and housing conditions, particularly among protected classes, are discussed in the following section.

Housing Needs

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford.

To assess affordability and other types of housing needs, HUD defines four housing problems:

- A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- A household is *overcrowded* if there are more than 1.0 people per room, not including kitchen or bathrooms.
- A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
- A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Gastonia and Gaston County is provided in the tables that follow.

An estimated 35.4% of households in Gastonia (10,109 households) and 27.6% of Gaston County households (23,145 households) have at least one housing problem (see Table 12). An estimated 19.2% of city households (5,494 households) and 14.6% of county households (12,234 households) have a *severe* housing problem (see Table 13).

White, non-Hispanic households account for the majority of households in Gastonia and Gaston County (61.8% and 77.5%, respectively), followed by Black households (29.4% and 16.2%,

respectively). Other races and ethnicities make up much smaller shares of households in both the city and county. Black, Hispanic, and Native American households in Gastonia experience housing problems at disproportionate rates: about 49% to 50% of Black and Hispanic households in the city have at least one of the four housing problems, and 71.4% of the 14 Native American households in the city have a housing problem. At the county level, Black, Hispanic and Pacific Islander households experience housing problems at disproportionate rates: About 42% to 44% of Black and Hispanic households in Gaston County experience at least one housing problem, and 100% of the 35 Pacific Islander households in Gaston County experience a housing problem.

Native American households in Gastonia experience severe housing problems at a disproportionate rate (71.4%, compared to 19.2% of all households in the city). While other racial and ethnic groups do not disproportionately experience severe housing problems,²³ these problems are significantly more common among Black, Hispanic, and Asian households (about 24% to 27% of which experience severe housing problems) than among white households in Gastonia, of which 14.7% experience severe housing problems. At the county level, Black and Hispanic households experience severe housing problems at the highest rates (24.5% and 21.3%, respectively, compared to 14.6% of all households).

Table 13 also shows rates of housing problems based on the size of the household. Family sizes examined here include small families with fewer than five members, large families with five or more members, and non-family households which include single persons and unrelated adults living together. Non-family households experience housing problems at the highest rates in both the city and county (48.7% and 40.2%, respectively). Small family households with fewer than five members in the city and county experience housing problems at the lowest rates (25.3% and 19.6% of households, respectively). An estimated 32% to 35% of large family households in the city and county experience at least one housing problem.

Table 14 examines severe housing cost burden in Gastonia and Gaston County. An estimated 16.6% households in Gastonia and 12.3% of households in Gaston County spend more than half of their monthly income on housing costs. Native American households in the city and county are disproportionately severely cost burdened (100.0% and 40.0% of households, respectively). Black households in the city and county and Asian households in the city also experience severe cost burden at higher rates (about 21% to 24% of households).

Table 14 also provides data on severe housing cost burden by household size. Rates of severe housing cost burden are slightly higher in Gastonia than in Gaston County as a whole. In both jurisdictions, non-family households have the highest rates of severe cost burden (26.8% and

²³ Defined as when one racial or ethnic group experiences housing problems at least 10 percentage points more frequently than the entire population.

21.3%, respectively). About 8% to 11% of small family households in the city and county experience severe cost burdens, while about 6% to 7% of large family households do.

These findings indicate that Black and Hispanic households in Gastonia and Gaston County are more likely to experience housing problems and severe housing problems than white households. In the city, severe housing problems are also more common among Asian households. While there are low numbers of Native American and Pacific Islander households in the city and county, these groups also tend to experience housing problems at higher rates. Native American, Black, and Asian households in the city experience the highest rates of severe housing cost burden. Non-family and large-family households have higher rates of housing problems in the city and county than do small families. Data also indicates that non-family households are most likely to be severely cost burdened.

Local measures that address disparities for these groups may reduce the barriers they experience in accessing a range of housing options. Increasing the availability of smaller, more affordable housing types, for example, may reduce housing cost burdens for non-family households.

TABLE 12. DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS, 2016-2020

Households Experiencing any of the Four Housing Problems	GASTONIA			GASTON COUNTY		
	# with Problems	# of Households	% with Problems	# with Problems	# of Households	% with Problems
RACE AND ETHNICITY						
White, Non-Hispanic	4,800	17,665	27.2%	15,195	65,050	23.4%
Black, Non-Hispanic	4,160	8,410	49.5%	5,970	13,560	44.0%
Hispanic	1,015	2,085	48.7%	1,695	4,060	41.7%
Asian, Non-Hispanic	124	418	29.7%	200	1,030	19.4%
Pacific Islander, Non-Hispanic	0	0	--	35	35	100.0%
Native American, Non-Hispanic	10	14	71.4%	50	175	28.6%
TOTAL	10,109	28,592	35.4%	23,145	83,910	27.6%

Households Experiencing any of the Four Housing Problems	GASTONIA			GASTON COUNTY		
	# with Problems	# of Households	% with Problems	# with Problems	# of Households	% with Problems
HOUSEHOLD TYPE AND SIZE						
Family Households, <5 People	3,970	15,749	25.3%	9,725	49,655	19.6%
Family Households, 5+ People	820	2,350	34.9%	2,130	6,630	32.1%
Non-Family Households	5,460	11,215	48.7%	11,655	28,985	40.2%
<i>Data Sources: CHAS, Tables 1, 4.</i>						

TABLE 13. HOUSEHOLDS WITH SEVERE HOUSING PROBLEMS

Households Experiencing any of the Four Severe Housing Problems	GASTONIA			GASTON COUNTY		
	# with Problems	# of Households	% with Problems	# with Problems	# of Households	% with Problems
RACE AND ETHNICITY						
White, Non-Hispanic	2,590	17,665	14.7%	7,900	65,040	12.1%
Black, Non-Hispanic	2,280	8,405	27.1%	3,330	13,560	24.5%
Hispanic	515	2,085	24.7%	865	4,055	21.3%
Asian, Non-Hispanic	99	417	23.7%	109	1,039	10.5%
Pacific Islander, Non-Hispanic	0	0	--	0	35	0.0%
Native American, Non-Hispanic	10	14	71.4%	30	175	17.1%
TOTAL	5,494	28,586	19.2%	12,234	83,904	14.6%
<i>Data Sources: CHAS, Tables 1, 2.</i>						

TABLE 14. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

Severe Cost Burden	GASTONIA			GASTON COUNTY		
	# with Severe Cost Burden	# of Households	% with Severe Cost Burden	# with Severe Cost Burden	# of Households	% with Severe Cost Burden
RACE AND ETHNICITY						
White, Non-Hispanic	2,285	17,665	12.9%	6,715	65,040	10.3%
Black, Non-Hispanic	2,010	8,410	23.9%	2,880	13,555	21.2%
Hispanic	360	2,090	17.2%	565	4,055	13.9%
Asian, Non-Hispanic	95	420	22.6%	95	1,025	9.3%
Pacific Islander, Non-Hispanic	0	0	--	0	35	0%
Native American, Non-Hispanic	10	10	100.0%	100	250	40.0%
TOTAL	4,760	28,595	16.6%	10,355	83,960	12.3%

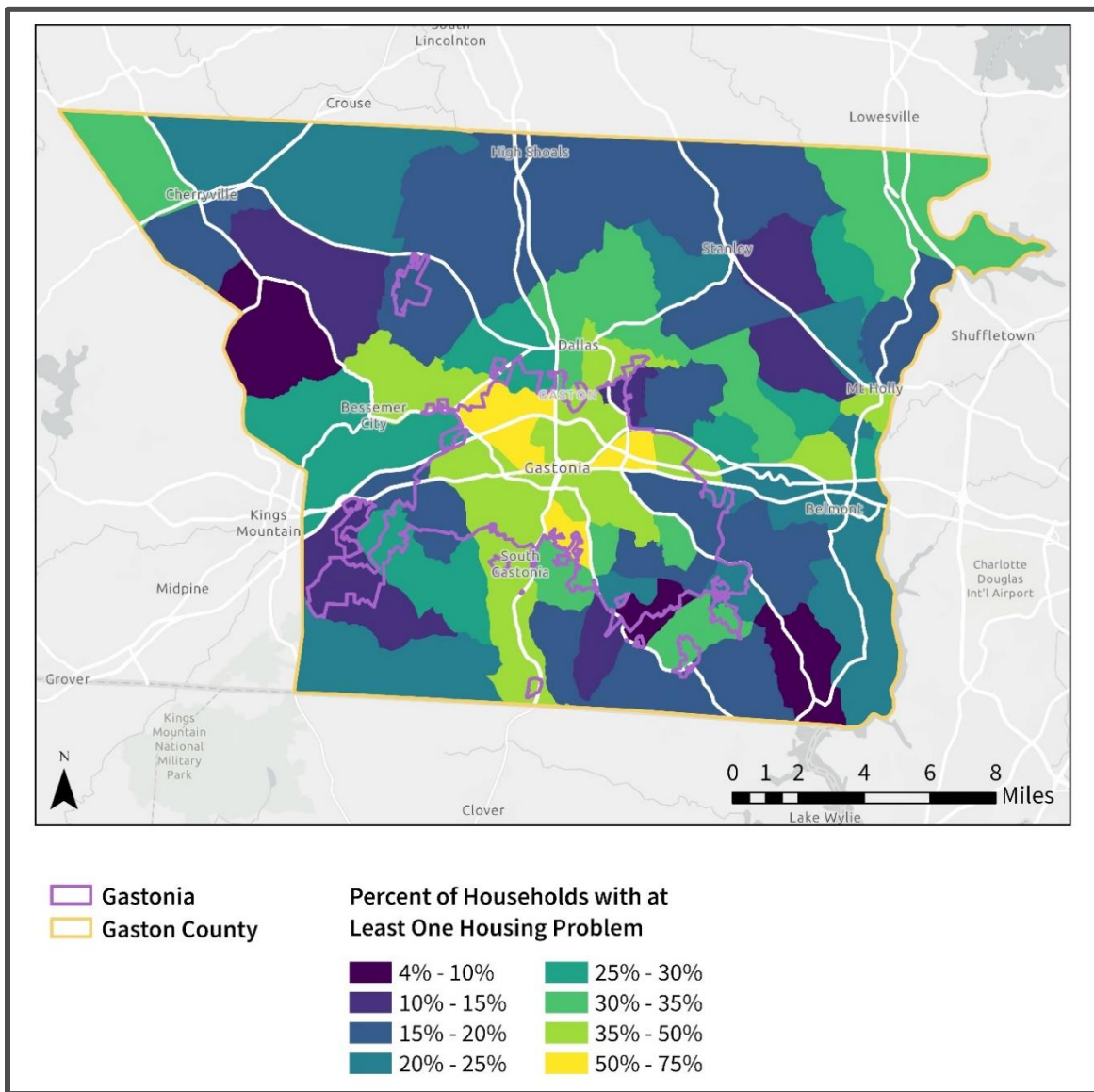
Severe Cost Burden	GASTONIA			GASTON COUNTY		
	# with Severe Cost Burden	# of Households	% with Severe Cost Burden	# with Severe Cost Burden	# of Households	% with Severe Cost Burden
HOUSEHOLD TYPE AND SIZE						
Family Households, <5 People	1,815	15,870	11.4%	4,170	49,855	8.4%
Family Households, 5+ People	140	1,980	7.1%	365	5,665	6.4%
Non-Family Households	2,843	10,610	26.8%	5,891	27,635	21.3%

Data Sources: CHAS, Tables 1, 7, 9.

NOTE: Severe housing cost burden is defined as greater than 50% of income.

The map that follows indicates the prevalence of housing problems in Gastonia and Gaston County. Rates of housing burden are greatest in parts of central, northwest, northeast, and south Gastonia, where in four census tracts, 50% to 75% of households experience at least one housing problem (most commonly housing cost burden or severe housing cost burden). In eight additional census tracts in south Gastonia and Gaston County and east Gaston County around Belmont and Mount Holly, 40% to 50% of households experience at least one housing problem. Problems such as cost burdens, overcrowding, or a lack of complete plumbing or kitchen facilities are most common among very low- and low-income households.

FIGURE 44. HOUSING PROBLEMS IN GASTONIA AND GASTON COUNTY



Source: CHAS, 2016-2020, Table 1

Homeownership and Lending

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,²⁴ and is correlated with positive cognitive and behavioral outcomes among children.²⁵

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.²⁶

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is eight percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.²⁷

The map that follows shows the homeownership rate by census tract in Gastonia and Gaston County. The share of homeowners is lowest in parts of north and central Gastonia and lowest in parts of east, south, and west Gaston County.

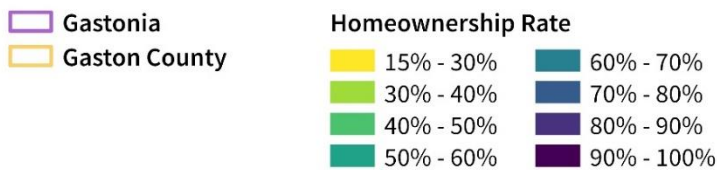
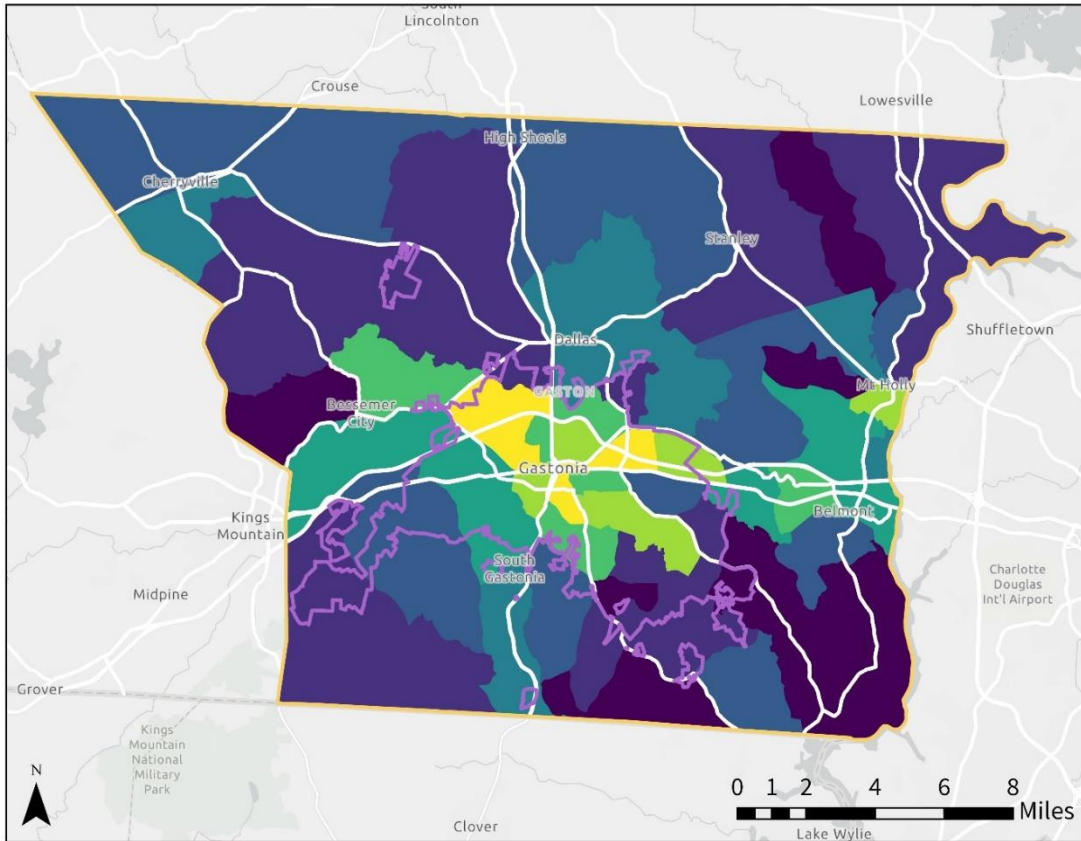
²⁴ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731-60.

²⁵ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." Low-Income Homeownership Working Paper Series. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

²⁶ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

²⁷ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf.

FIGURE 45. HOMEOWNERSHIP RATE, GASTONIA AND GASTON COUNTY, 2017-2021



The table that follows shows numbers of owner and renter households, as well as homeownership rates, by race and ethnicity for Gastonia, Gaston County, and the Charlotte-Gastonia-Concord, NC-SC MSA. Owner-occupied households make up 54.0% of all households in Gastonia, 65.7% of households in Gaston County, and 66.0% of households in the metro area. Homeownership rates are highest among white and Asian households in the city, county, and metro, ranging from about 65% to 75% for white households and 65% to 81% for Asian households across the three areas. In Homeownership rates are lowest among Black, Hispanic, Native American, and Pacific Islander households, and households identifying as ‘some other race.’

TABLE 15. HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Householder Race and Ethnicity	GASTONIA			GASTON COUNTY			CHARLOTTE-GASTONIA-CONCORD, NC-SC MSA		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
White	12,764	6,881	65.0%	49,822	18,919	72.5%	499,830	172,050	74.4%
Black	2,901	6,197	31.9%	5,654	9,117	38.3%	105,147	124,224	45.8%
Hispanic	891	1,473	37.7%	1,979	2,697	42.3%	36,876	38,149	49.2%
Asian	296	71	80.7%	903	211	81.1%	22,863	12,508	64.6%
Pacific Islander	0	0	---	0	62	0.0%	138	229	37.6%
Native American	7	31	18.4%	78	100	43.8%	1,765	1,514	53.8%
Some Other Race	273	604	31.1%	509	822	38.2%	13,667	15,613	46.7%

Householder Race and Ethnicity	GASTONIA			GASTON COUNTY			CHARLOTTE-GASTONIA-CONCORD, NC-SC MSA		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Two or More Races	496	470	51.3%	1,311	1,202	52.2%	17,772	14,614	54.9%
TOTAL	16,737	14,254	54.0%	58,277	30,433	65.7%	661,182	340,752	66.0%

Data Sources: 2017-2021 5-Year American Community Survey, Table S2502

NOTE: Data presented are number of households, not individuals.

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2021 HMDA data consists of information for 23.3 million home loan applications reported by 4,338 home lenders including banks, savings associations, credit unions, and mortgage companies.²⁸ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income. 452 financial institutions reported HMDA data for Gaston County in 2022.

Gaston County had a total of 6,636 home purchase loan application records in 2022. The following analysis looks at 4,180 applications in which the mortgage was applied for as a first lien, including conventional, FHA-insured, VA-guaranteed, and FSA / RHS-guaranteed loans for single-family homes. Within each record, some data variables are 100% reported— “Loan Type,” “Loan Amount,” and “Action Taken,” for example—but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant may have declined to identify their sex, race and / or ethnicity. Records for applications with missing race and ethnicity data are included in a separate category entitled “No Race or Ethnicity Given.”

Looking at first-lien applications completed in 2022, just over half of application in Gaston County were completed by white, non-Hispanic applicants (2,163 applications, or 51.7%). Black applicants and applicants who did not identify their race or ethnicity each made up about 15% of all completed applications (638 and 612 applications, respectively). Hispanic or Latino applicants submitted 12.8% of applications (533 applications), and Asian or Pacific Islander applicants submitted 3.2% of applications (134 applications). Smaller shares of applications were submitted jointly by applicants of different races, by Native American applicants, and by applicants of two or more minority races (75, 16, and 9 applications, respectively).

²⁸ Federal Financial Institutions Examination Council (FFIEC). “Press Release: FFIEC Announces Availability of 2021 Data on Mortgage Lending.” June 16, 2022. <https://www.ffiec.gov/press/pr061622.htm>

Hispanic households were overrepresented among loan applications compared to their share of households countywide (12.8% of loan applications versus 5.3% of all households). Asian households were also overrepresented compared to their share of households countywide, (3.2% of loan applications versus 1.4% of all households). White, non-Hispanic households account for 75.0% of all households in Gaston County but comprised a lower share of completed applications (51.7%).

The tables that follow shows loan approval rates for completed loan applications by race and ethnicity at various income levels in Gaston County.²⁹ The Median Family Income in the Charlotte-Concord-Gastonia, NC-SC HUD Metro FMR Area is \$102,800, according to HUD's FY 2023 Income Limits. The income tiers below represent low-income applicants earning up to 80% AMI (82,240), middle income applicants earning between 80% to 120% AMI (\$82,240 to \$123,360), and high-income applicants earning more than 120% AMI (over \$123,360).³⁰ In 2022, there were 177 applications for which income was not reported. These applications are included in the totals under "all income levels." Excluded from these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

²⁹ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle-income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

³⁰ The median household income in Gastonia is lower than that of the MSA, so more households fall into the low-income category than would if a lower income level were used in developing income thresholds.

TABLE 16. HOME PURCHASE LOAN DENIAL RATES BY RACE AND ETHNICITY IN GASTON COUNTY, 2022

Applicant Income	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More Minority Groups	Joint			
LOW INCOME									
Completed Applications	927	358	40	9	5	20	324	236	1,919
Denied Applications	92	52	7	1	2	4	43	36	237
Denial Rate	9.9%	14.5%	17.5%	11.1%	40.0%	20.0%	13.3%	15.3%	12.4%

Applicant Income	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More Minority Groups	Joint			
MIDDLE INCOME									
Completed Applications	562	172	45	1	2	28	124	123	1,057
Denied Applications	16	12	4	0	0	3	8	11	54
Denial Rate	2.8%	7.0%	8.9%	0.0%	0.0%	10.7%	6.5%	8.9%	5.1%

Applicant Income	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More Minority Groups	Joint			
HIGH INCOME									
Completed Applications	644	103	48	6	2	27	77	120	1,027
Denied Applications	30	14	1	0	0	0	5	4	54
Denial Rate	4.7%	13.6%	2.1%	0.0%	0.0%	0.0%	6.5%	3.3%	5.3%

Applicant Income	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More Minority Groups	Joint			
ALL INCOME LEVELS									
Completed Applications	2,163	638	134	16	9	75	533	612	4,180
Denied Applications	142	78	12	1	2	7	58	72	372
Denial Rate	6.6%	12.2%	9.0%	6.3%	22.2%	9.3%	10.9%	11.8%	8.9%
<i>Data Sources: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda.</i>									

NOTE: “Completed applications” includes applications that were denied and approved with a loan originated. It does not include applications that were approved but not accepted, applications withdrawn by the applicant, or applications closed for incompleteness.

TABLE 17. REASONS FOR DENIAL BY RACE AND ETHNICITY, GASTON COUNTY, 2022

	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More	Joint			
REASONS FOR DENIAL									
1 - Debt-to-Income Ratio	49	34	4	0	1	6	26	23	143
2 - Employment History	5	0	0	0	0	0	1	0	6
3 - Credit History	31	16	1	1	0	1	12	8	70
4 - Collateral	22	9	3	0	0	0	2	10	46
5 - Insufficient Cash (down payment, closing costs)	4	5	1	0	0	0	4	1	15
6 - Unverifiable Information	5	1	0	0	1	0	2	16	25

	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More	Joint			
7 - Credit Application Incomplete	19	7	2	0	0	0	4	9	41
8 - Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
9 - Other	7	6	1	0	0	0	6	5	25
10 - Not Applicable	0	0	0	0	0	0	1	0	1
TOTAL DENIALS	142	78	12	1	2	7	58	72	372

Data Sources: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda.

NOTE: “Completed applications” includes applications that were denied and approved with a loan originated. It does not include applications that were approved but not accepted, applications withdrawn by the applicant, or applications closed for incompleteness.

HMDA data indicates that 8.9% of first-lien mortgage applications for single-family homes in Gaston County were denied in 2022. 12.4% of all applications from low-income earners were denied. Among middle-income earners, 5.1% of applicants were denied a loan, and 5.3% of applications from high-income earners were denied. Looking at these figures by race and ethnicity, applicants of two or more minority groups and Black applicants were denied mortgages at higher rates (22.2% and 12.2%, respectively) when compared to the county's average rate of 8.9%. Hispanic or Latino and Asian or Pacific Islander applicants also experienced higher rates of mortgage denial (10.9% and 9.0%, respectively), compared to white applicants in the county, 6.6% of whom were denied a loan. Overall, Black applicants in Gaston County were about 1.9 times as likely to be denied a loan as white applicants. Hispanic or Latino applicants and Asian applicants were about 1.7 and 1.4 times as likely to be denied as white applicants, respectively.

12.4% of low-income mortgage loan applicants were denied a mortgage loan. Low-income applicants of two or more minority groups, low-income applicants of different races submitting applications jointly, low-income Asian or Pacific Islander applicants, and low-income Black applicants experienced the highest rates of mortgage denial (14.5% for Black applicants to 40.0% for applicants of multiple races). An estimated 9.9% of low-income white applicants were denied a mortgage.

Middle-income applicants earning between 80% to 120% MFI were denied mortgages at a rate of 5.1%. At this income level, joint applications and applications from Asian or Pacific Islander residents, Black residents, and Hispanic or Latino residents were denied at higher rates (6.5% to 10.7%) than applications from white households (2.8%).

At high incomes, 5.3% of applicants had a mortgage loan denial. At this income level, Black and Hispanic or Latino applicants experienced denial at the highest rates (13.6% and 6.5%), while white and Asian or Pacific Islander applicants had much lower rates of denial (4.7% and 2.1%, respectively). Few applications were submitted jointly or by Native American applicants and applicants of two or more minority groups, but none of these applications were denied.

Reasons for denial are shown in Table 17. White, Black, and Hispanic households had the largest numbers of denials. The primary reason for mortgage loan denial was debt-to-income ratio, and Black and Hispanic or Latino applicants were overrepresented among denials for this reason (43.6% and 44.8% of denials, respectively, vs. 38.4% of denials among all applicants). Other frequent reasons for loan denial include credit history, collateral, and incomplete credit application.

These findings indicate disparities in access to mortgage loans in Gaston County, particularly for Black, Hispanic or Latino, and Asian applicants, and for applicants of multiple races. Denials based on high debt-to-income ratio and poor credit history indicate that many applicants struggle with long-term financial instability, which creates additional barriers to accessing a mortgage. The data suggests that additional resources are needed to stabilize the path to homeownership, including support for homebuyer readiness classes or other pre-application assistance, down payment

assistance programs, and wider ranging social supports for households to improve their chances of securing mortgage loans.

Zoning, Affordability, and Housing Choice

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region's potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

The following sections will explore (I) how North Carolina state law impacts local land use and zoning authority and decision-making and (II) how the zoning and land use codes of the City of Gastonia impact housing affordability and fair housing choice within its municipal borders.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan. They may also define categories of permitted and special/conditional uses for those districts and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts. In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the North Carolina Housing Law, the federal Fair Housing Act, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. In *Texas Department of Housing & Community Affairs v. Inclusive Communities Project*, a recent landmark disparate impact case under the Fair Housing Act, the Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes "[A] refusal to make reasonable accommodations in

rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.” This provision has been held to apply to zoning and land use decisions by local governments.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units, and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

City of Gastonia Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The City’s treatment of these types of issues, mainly through its Unified Development Ordinance, are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning and land use ordinances of Gastonia were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (a) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (b) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

- 1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;
- 2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;
- 3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and the City’s scores for each issue. A complete report including citations to relevant statutes, code sections, and explanatory comments, is included as an appendix to this document.

TABLE 18. CITY OF GASTONIA'S ZONING CODE RISK SCORES

Issue	Risk Score
<p>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p> <p>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	1
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	1
<p>3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</p> <p>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</p>	2
<p>4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?</p>	2

5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	3
6a. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single-family dwelling districts? 7b. Do multi-family districts restrict development only to low-density housing types?	2
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	2
9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction? 9b. Is there any provision for monitoring compliance?	1
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2
Average Risk Score	1.7

The City's total average risk score (calculated by taking the average of the 10 individual issue scores) is 1.7, indicating that overall there is low to moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. The City received a "3" (high risk) score on one issue (#5) and also received a "2" (medium risk) score on certain issues where the zoning regulations have the potential to negatively impact fair and affordable housing. These medium and high-risk scores could indicate the City may be vulnerable to fair housing complaints where the ordinance is applied in a way that impacts a protected class of persons. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all the area's residents and to better fulfill the mandate to affirmatively further fair housing.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the City's codes create a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

Impact of Zoning Provisions of Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.³¹ Zoning policies that impose barriers to housing development

³¹ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, *A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index (2007)*, available at real.wharton.upenn.edu; Randal O'Toole, *The Planning Penalty: How Smart Growth Makes Housing Unaffordable (2006)*, available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, *The Impact of Zoning on Housing Affordability (2002)*, available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's *Housing Development Toolkit, 2016*, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units. Where these zoning regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

Overall the City's design standards, density allowances, and housing-type diversity do not appear facially exclusionary, and the City received "1/low risk" score for Issue 6 and a "2/medium risk" score for Issue 7 regarding exclusionary zoning regulations for single and multifamily housing types. While the zoning ordinance may impact the feasibility of developing affordable housing within some low-density rural districts, such as the RLD (residential low density zoning), thus creating a barrier to fair housing choice in some neighborhoods, the current housing stock and code provide for lot sizes, design requirements, and densities that could accommodate affordable housing elsewhere within the residential districts. But there are recommendations for how the City could use more permissive and flexible zoning and land use policy to support investment in its affordable housing stock.

The UDO divides the residential zoning districts into low-density "rural residential" districts (RLD, RSF, RSB, RSC) and four "urban residential" districts (RS-20, RS-12, RS-8 and RMF). Minimum lot sizes for single family dwellings range from 87,000 sq. ft. in the RLD, 20,000 sq. ft. in the RS-20, 12,000 sq. ft. in the RS-12, and 8,000 sq. ft. in the RS-8 and RMF districts. Compared to larger cities with higher populations and smaller lot size requirements, Gastonia's smallest minimum lot size of 8,000 sq. ft. is still relatively large compared to what is required for patio/garden homes, duplexes, zero-lot line homes, townhomes, and other varieties of single and two-family dwellings.

Two-family dwellings are allowed as a use by right on corner lots (except in the RS-8 district). Two-family dwellings on interior lots require a conditional use permit in the RLD (Residential Low Density), RMF (geared towards multi-family residential development), RS-20, and TMU (Transitional Mixed Use) districts. A conditional use permit also is required for a two-family dwelling in the RS-8 zone and must be on a corner lot.

More flexible design and a greater variety of housing types may be allowed with conditional permit approval under one of the Planned Development districts—Planned Residential District (PRD), Infill Residential District (IRD), Traditional Neighborhood District (TND), Planned Unit Development (PUD). However, residential density allowances are still limited, and planned communities do require additional design requirements and permitting and review processes than traditional residential zoning. In the Planned Development districts, maximum density for single family projects is 3 units per acre; for developments including single-family attached dwellings, maximum density is 5 units per acre; and with multi-family components, maximum density is 7 units per acre. A density bonus may be granted to projects with greater coverage of common open space. On approved IRD lots, minimum lot size is only 4,000 sq. ft. and allows for a variety of single-family housing types like no lot line homes, patio homes, village homes, and twin homes. Residential components, including single family detached and attached housing, also are permitted in the mixed-use districts—TMU (Transitional Mixed Use), OLC (Office/Light Commercial), CBD (Central Business District), UMU (Urban Mixed Use), O-1 (accommodates larger-scale office developments along with complimentary commercial service establishments), C-1 (Light Commercial), C-2 (Highway Commercial), and IU (Urban Industrial) zones.

Permitting or incentivizing conversion of single-family dwellings in high opportunity in-town neighborhoods to two-family, 3-family, or multifamily dwellings on large lots also is a strategic way to address the need for more density and infill development in established neighborhoods.

While traditional single-family neighborhood lot sizes may have larger minimums than needed or than compared to other jurisdictions, the UDO does not impose minimum floor areas or housing size. Overall, the UDO's lot/area standards, design standards, density allowances, and housing-type diversity have not been identified as an impediment to affordable housing and should allow for affordable single family detached and attached housing within the jurisdiction, though as land costs increase the City could consider lowering the minimum lot size requirements and removing the conditional permit approval process for two-family and multi-family housing developments in some districts and instead rely on a less time-consuming and less expensive administrative site plan review process to maintain oversight.

Multifamily housing is permitted by right up to 8 units per acre in the RMF residential district and in the mixed-use districts – TMU, OLC, CBD, UMU, O-1, C-1, and IU. However, densities greater than 8 u/a require conditional zoning approval. Permitted densities also are limited by the maximum height allowances, 45 feet in most zones or higher only with conditional zoning approval. The minimum lot size is 43,560. Developments on less than two-acre tracts may only require administrative approval, but tracts greater than 2 acres require planning commission and/or city council approval. In the TMU districts, maximum height is 50 feet but may be increased to 75 ft. if located 200 feet from a residentially zoned lot. In the OLC and O-1 mixed office districts, multifamily may be permitted on minimum lot sizes of 5,000 sq. ft. and maximum height of 50 feet. In the O-M district, the height may be increased to 125 feet if located 300 feet from a residentially zoned lot.

While low density multifamily may be permitted by right in most mixed-use zones, medium and higher density requires additional administrative and public hearing processes for approval through conditional use zoning or variances, which can impose higher costs on development and may artificially and unreasonably affect the feasibility of developing affordable and low-income housing within the jurisdiction.

As for Issue 8 regarding alternative affordable housing types, manufactured homes are allowed on individual lots in manufactured home subdivisions in the RLD, RS-12, RS-8, and RMF zones. However, the UDO puts a moratorium on new manufactured home parks or the expansion of existing manufactured home parks. The code allows “private residential quarters” (an accessory dwelling in the form of a guest house or garage apartment) as an accessory use to any single-family detached dwelling unit provided that (i) the accessory unit is not rented or occupied for gain (except in a Traditional Neighborhood District); (ii) it is occupied only by a disabled person, family member, an occasional guest or live-in servant; and (iii) the principal dwelling is owner-occupied. The city recognizes that “these innovative (but historically traditional) housing forms help to accommodate family situations and promote income diversity within the TND.” However, limiting the type of person who may occupy the accessory dwelling, such as a family member of the owner, could be challenged as an arbitrary regulation designed to preserve the existing racial makeup of a neighborhood rather than allowing for greater integration. On the other hand, the UDO’s recognition that accessory dwellings may “promote income diversity” could be applied in other districts besides just TNDs. There is opportunity to expand alternative and low-impact affordable housing options by permitting accessory dwelling units for rent, especially in low density areas where large lot sizes would easily accommodate accessory dwellings and additional off-street parking, and by removing the restrictions against the type of person who may occupy the accessory unit and by not requiring that the accessory unit count toward density calculations. Permitting or incentivizing conversion of single-family dwellings in high opportunity in-town neighborhoods to two-family, 3-family, or multifamily dwellings also is a strategic way to address the need for more density and infill development in established neighborhoods.

Exclusionary zoning can happen on a continuum and there is more the City could do to use zoning and land use policies to further remove artificial barriers to development of and access to affordable housing across all residential zones. For example, to encourage more infill development in the traditionally low-density neighborhoods, minimum lot sizes could be further reduced; multifamily housing density and height standards could be increased by right instead of requiring conditional use or variance approval; accessory dwellings could be permitted for rent in more neighborhoods; conversion of established single-family dwellings to multi-unit dwellings permitted by right; and height restrictions relaxed to allow for more density on the same footprint.

All together, these zoning tools could potentially allow for more supply of housing, which helps put downward pressure on rental and sale prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity

areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

Moreover, the City's land use regulations could go beyond just meeting the minimum FHA standards and affirmatively further and incentivize the development of affordable housing with inclusionary zoning policies (Issue 10). One tool the City has codified to help protect existing affordable housing stock is found in Chap. 16, Minimum Housing Standards, of the Code of Ordinances, which provides that whenever the housing inspector determines that a dilapidated building must be vacated or demolished, notice must be given to registered affordable housing organizations to allow opportunity for the organization to negotiate to make repairs, lease, or purchase the property for the purpose of providing or preserving affordable housing. (See Code of Ordinances Sec. 16-132(b)(6).) But otherwise, Gastonia has not adopted specific development incentives like density bonuses, reduced parking, or design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes.

Publicly Supported Housing

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The Low-Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program offers indirect federal subsidies for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.³²

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing and housing vouchers to cluster in

³² Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.³³ The reasons for clustering of HCVs are more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.³⁴ This section reviews the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the City of Gastonia and Gaston County.

Supply and Occupancy

Gastonia’s housing authority administers the Housing Choice Voucher program for Gaston County. These are included along with all other publicly-supported housing units in the table below. Taken together, these programs account for 5.8% of the housing units in Gastonia, and 3.0% of Gaston County’s housing units. However, because the programs are all rent-based, the share of rental units in the area supported in some form by a public subsidy is considerably higher.

Subsidized housing units are also available through the state’s Low Income Housing Tax Credit (LIHTC) program. The LIHTC program provides housing units to renters earning no more than 60% AMI. The City of Gastonia has approximately 1,005 low-income LIHTC units, and Gaston County has an estimated 1,696. LIHTC units in the county are primarily two-bedroom units (41.7% of LIHTC units) or one-bedroom units (36.7%). Three-bedroom units make up 17.7% of LIHTC units, and four-bedroom units make up just 3.8% of units.

TABLE 19. PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	GASTONIA		GASTON COUNTY	
	#	%	#	%
TOTAL HOUSING UNITS	34,363		97,109	
Public Housing	0	0.0%	96	0.1%
Project Based Section 8	255	0.7%	648	0.7%
HCV Program	860	2.5%	1,752	1.8%

³³ Dawkins, Casey J. *Exploring the Spatial Distribution of Low-Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

³⁴ Galvez, Martha M. *What Do We Know About Housing Choice Voucher Pro/gram Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

Housing Units	GASTONIA		GASTON COUNTY	
	#	%	#	%
Other Multifamily	125	0.4%	190	0.2%
LIHTC Program	1,005	2.9%	1,696	1.7%

Data Sources: 2021 APSh; HUD User LIHTC Database.

Table 20 shows the racial and ethnic composition of publicly supported housing units, as well as estimates for the numbers of low-to-moderate income households in the city and county. Data provided in the table portrays how closely the publicly supported housing residency rate of several racial and ethnic groups compares to their share of the general population.

To qualify for housing assistance from housing authorities, applicants must meet HUD established income limits that are determined annually. Extremely low-income households earning less than 30% of area median income (AMI) or the federal poverty level and very low-income households earning less than 50% of AMI automatically qualify for assistance, while low-income households earning less than 80% of AMI may qualify if they meet other eligibility criteria.

An estimated 61.8% of Gastonia households and 77.5% of households in Gaston County identify as white, yet white households make up only 23% of public housing households in the county and 19% to 22% of voucher-holding households in the city and county. White households are less underrepresented in project-based Section 8 units, where they make up 49% of households in both the city and county, and in other multifamily housing, where they make up about 51% to 61% of households in the city and county. African American households are overrepresented in public housing units and the voucher program compared with their shares of the city’s population (72% of households in public housing and 76% to 79% of voucher-holding households compared to 29.4% of the total households in the city and 16.2% of county households). Though their share of the total households is small, Hispanic and Asian households are underrepresented in all public housing programs. These trends appear at the county level as well.

TABLE 20. PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE / ETHNICITY

Housing Type	RACE / ETHNICITY- GASTONIA									
	White		Black		Latino		Asian or Pacific Islander		Native American	
	#	%	#	%	#	%	#	%	#	%
Public Housing	--	--	--	--	--	--	--	--	--	--
Project-Based Section 8	125	49%	112	44%	5	2%	3	1%	0	0%
Other Multifamily	64	51%	37	30%	6	5%	--	--	--	--
HCV Program	163	19%	679	79%	26	3%	0	0%	--	--
0-30% AMI	2,845	16.1%	2,455	29.2%	450	21.6%	50	12.0%	10	71.4%
0-50% AMI	4,965	28.1%	4,415	52.5%	960	46.0%	120	28.7%	10	71.4%
0-80% AMI	8,260	46.8%	6,110	72.7%	1,525	73.1%	165	39.5%	14	100%
TOTAL HOUSEHOLDS	17,665	100%	8,410	100%	2,085	100%	418	100%	14	100%

Data Sources: 2016-2020 CHAS, Tables 1 and 9; 2022 APSH.

NOTE: Data presented are number of households, not individuals.

Housing Type	RACE / ETHNICITY- GASTON COUNTY									
	White		Black		Latino		Asian or Pacific Islander		Native American	
	#	%	#	%	#	%	#	%	#	%
Public Housing	22	23%	69	72%	2	2%	2	2%	--	--
Project-Based Section 8	318	49%	272	42%	13	2%	6	1%	6	1%
Other Multifamily	116	61%	42	22%	8	4%	3	1%	--	--
HCV Program	385	22%	1,332	76%	35	2%	0	0%	0	0%
0-30% AMI	10,300	15.8%	3,610	26.6%	845	20.8%	65	6.1%	110	62.9%
0-50% AMI	20,265	31.2%	6,530	48.2%	1,740	42.9%	220	20.7%	130	74.3%
0-80% AMI	32,900	50.6%	9,250	68.2%	2,815	69.3%	370	34.7%	175	100%
TOTAL HOUSEHOLDS	65,050	100%	13,560	100%	4,060	100%	1,065	100%	175	100%

Data Sources: 2016-2020 CHAS, Tables 1 and 9; 2022 APSH.

Geography of Supported Housing

As a public housing authority, the Gastonia Housing Authority (GHA) is the entity responsible for administering over 1,200 Housing Choice Vouchers used in communities across the region, as well as project-based vouchers in properties throughout the area. GHA no longer owns any traditional public housing as all of its former public housing units have been converted to vouchers under the Rental Assistance Demonstration (RAD) program. Traditional public housing is offered in Gaston County by the housing authorities of Belmont and Mount Holly.

The map that follows indicates the locations of publicly supported housing developments and voucher use within Gastonia and Gaston County (see Figure 46).

Public housing properties in Gaston County are located in Belmont (50 units) and Mount Holly (46 units). There are no public housing units located within the city of Gastonia.

Project-based Section 8 units are clustered in Gastonia (415 units) with additional sites located in Kings Mountain (50 units), High Shoals (40 units), Stanley (40 units), Cherryville (35), Mount Holly (34), and Belmont (32). As detailed in Figure 46, properties in the county with greater numbers of units tend to be located in Gastonia.

Low-income housing tax credit (LIHTC) properties are clustered in the city of Gastonia (an estimated 873 units serving residents with incomes up to 60% of the area median gross income), with additional properties in Dallas (212 units), Belmont (202 units), Bessemer City (91 units), Cherryville (62 units), Kings Mountain (50 units), Cramerton (40 units), and Stanley (34 units).

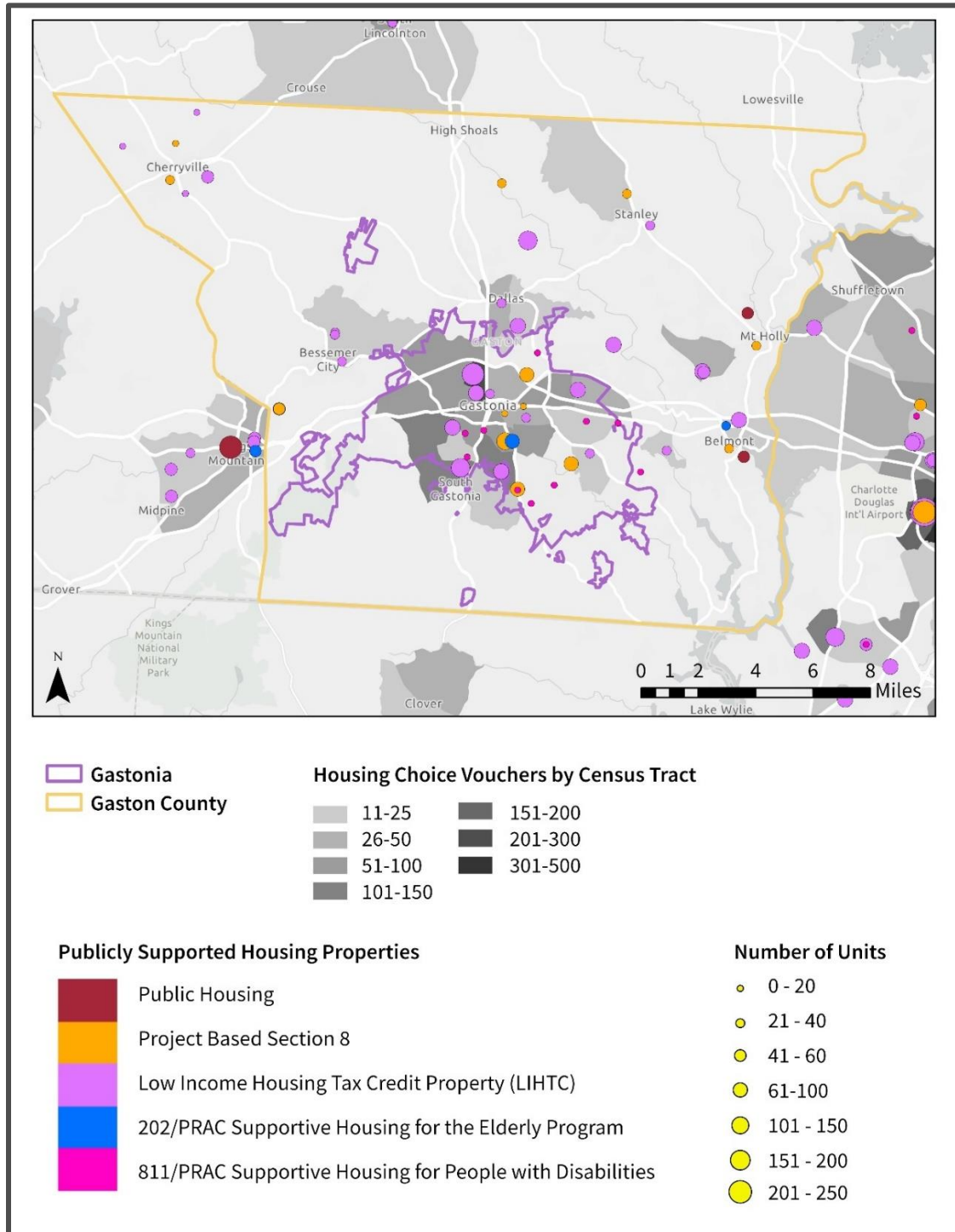
The two Section 202/PRAC (Supportive Housing for the Elderly Program) properties in the county are located in Gastonia (82 units) and Belmont (39 units) and provide housing for residents aged 62 and above.

The county's ten Section 811/PRAC properties (Supportive Housing for People with Disabilities), all located within the city of Gastonia, provide 69 housing units for residents with disabilities.

Housing choice vouchers (HCV) are in use throughout much of Gaston County, with their greatest use in the Beaverbrook neighborhood in central Gastonia, where they comprise 30.8% of renter-occupied housing units. Their next greatest use is in parts of south and southwest Gastonia, where they make up 20.8% to 22.5% of renter units. The lack of HCVs in use in other areas of the county points to a limited supply of units that are accepting vouchers and affordable to voucher holders in these neighborhoods. Housing Choice Voucher programs in the Charlotte-Gastonia-Concord metro area use Small Area Fair Market Rents to provide multiple payment standards, with the goal of supporting voucher holders in accessing housing in higher opportunity neighborhoods where housing costs may be higher. Residents and stakeholders noted difficulties finding landlords that will accept voucher holders as tenants, a practice known as source of income discrimination. This

practice serves as a barrier to accessing affordable housing in particular neighborhoods, negating the HCV program’s goal of providing flexibility in housing location.

FIGURE 46. PUBLICLY SUPPORTED HOUSING IN GASTON COUNTY



Policy Review

As required by HUD, GHA maintains a comprehensive Five-Year Public Housing Authority plan, with annual plan updates, as well as other program-specific policies. The most pertinent of these policies for review in this analysis is the GHA's Administrative Plan for the Housing Choice Voucher and Project-Based Voucher programs. This document sets policy for who may be issued a voucher by the GHA and how those tenant households are selected. Four different aspects of the Administrative Plan are examined here: tenant selection, local preference, tenant screening, and subsidy standards. These four policy types all allow some degree of local determination by GHA and are among the most central to matters of fair housing choice.

HCV assistance is competitive and housing authorities often maintain lengthy waiting lists of potential tenants. Depending upon the length of time that applicants may need to wait to receive assistance, GHA may use a one- or two-step application process. A one-step process is used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance. A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

Applications are received continuously and all completed applications are added to the wait list. The GHA keeps enough applications on its waiting list to fill expected vacancies over a 24-month period. When the waiting list is sufficiently long that GHA estimates new applicants will not reach the top within 24 months, the list will be closed and no new applications are accepted. An applicant's position on the waiting list is determined first by any targeted funding or local preference criteria and then by the date and time of their completed application. As a family approaches the top of the waiting list a through screening and eligibility review are conducted. Families submitting an initial application when the waiting list is less than 60 days may proceed directly to this eligibility review step.

The process by which applicants are ranked and selected from a waiting list is guided by a tenant selection policy. Selection of applicants from the GHA's waiting list is determined first by any targeted funding or preference categories for which the applicant may qualify, followed by the date and time of the prospective tenant's application. Targeted funding refers, in GHA's case, to a specific stream of designated voucher funding for non-elderly disabled households. Applicants meeting criteria for this program may be served with the designated non-elderly disabled funding ahead of others on the waiting list who do not qualify. Ordinarily, a "date and time" standard for

waiting list selection can be somewhat problematic for disadvantaging applicants who have inflexible, hourly work schedules or transportation and childcare challenges. In the case of the GHA, however, application date and time is more akin to a tie-breaker given the targeted funding and preference criteria that are applied first.

HUD allows public housing authorities to, within narrow boundaries, set local preferences for the applicants who will be selected from their waiting lists. Local preferences must be constructed carefully to avoid discrimination against protected classes but can be helpful tools to strategically adapt public housing programs to local housing needs and priorities as determined through data-driven planning processes. For its voucher programs, GHA applies a set of local preference criteria to the tenant selection process. Applications selected from the waiting list will be ordered by the following preferences, in order of priority:

1. 10 preference points – North Carolina Mainstream Eligible Families who are transitioning out of an institution (subject to availability of a Mainstream Voucher).
2. 9 preference points – North Carolina Mainstream Eligible Families who are at serious risk for institutionalization (subject to availability of a Mainstream Voucher).
3. 8 preference points – North Carolina Mainstream Eligible Families who are homeless (subject to availability of a Mainstream Voucher).
4. 7 preference points – North Carolina Mainstream Eligible Families who at serious risk of becoming homeless (subject to availability of a Mainstream Voucher).
5. 6 preference points – All other Mainstream Eligible North Carolina Families
6. 5 preference points – RAD Choice Mobility Families
7. 4 preference points - Gaston County Elderly and Disabled Families (Residency preference- Gaston County families are defined as living, working or having been hired to work in Gaston County. Family is defined as one or more than one person or a single member family who is elderly or disabled).
8. 3 preference points – Gaston County families
9. 2 preference points – Gaston County single-member families
10. 1 preference points – All other families (non-Gaston County residents)

The first several of these preferences are designed to direct housing opportunities to households that are in particularly vulnerable or precarious housing situations. The second and third to last criteria are residency preferences favoring local resident families. The GHA defines a “Gaston County family” as one that lives, works, or has been hired to work in Gaston County. When narrowly tailored to a single specific community, residency preferences can have the effect of limiting housing choice on a regional basis. In GHA’s case, this preference, based on countywide region, largely avoids this criticism as it allows for a degree of mobility within the wider Gastonia area. However, Gaston County is economically tied to the greater Charlotte region and the GHA’s preferences could also serve to close off housing opportunities in Gaston County from residents

elsewhere in the region who have a connection to Gastonia other than living or working in the immediate area.

Tenant screening, specifically policies regarding criminal background checks, is another aspect of this review. For Housing Choice Voucher (HCV) programs, tenant screening is optional for the housing authority. Recognizing that people of color are disproportionately more likely to have experienced an encounter with the criminal justice system and to have arrest records or criminal convictions, HUD issued guidance in 2016 warning that blanket policies of refusal to rent to people with criminal records could be discriminatory. Although criminal history is not a protected class, under the Fair Housing Act, restricting housing access on the basis of criminal history could be unlawful if it results in a disparate impact on people of a specific race or ethnicity. Rather than blanket policies, exclusions of persons with criminal histories must be tailored to the housing provider's legitimate interests, be applied consistently to all applicants, and take into account the type of crime, time since conviction, and other factors.

GHA has made efforts to moderate the influence of criminal background on tenant eligibility, while also supporting the safety of its residents and communities. The GHA conducts criminal background checks on all adult household members named on a voucher application and may deny housing to a family because of drug-related criminal activity, violent criminal activity by family members, and/or registration on the National Sex Offender Registry. Federal regulations govern the barring of applicants in some of these cases, but where regulations afford it discretion, GHA's policy allows for the consideration of individual circumstances before choosing to deny voucher assistance. The factors GHA may consider include the effect that denial of assistance may have on other non-implicated members of the family, whether the history is associated with a family member who was a minor or who has a disability, and whether, in the case of drug or alcohol abuse, the culpable household member is participating in a supervised drug or alcohol rehabilitation program.

Finally, individual housing authorities are required to include in their policies the criteria by which they determine the number of bedrooms needed to house families of various sizes and compositions; these are known as subsidy standards. HCV families are not required to seek or rent dwellings with the number of bedrooms determined by the subsidy standard, but rather the standards determine the amount of the subsidy the family qualifies for based on its size. The GHA's subsidy standards are based on the number of people in a household, generally without regard for age, gender, or family relationship. The subsidy calculation allows for up to one bedroom for the head of household and spouse/ significant other, and one bedroom for every two additional household members except in the following circumstances:

1. Live-in aides will be allocated a separate bedroom.
2. Single person families will be allocated one bedroom.

3. Remaining household members of opposite sex AND of different generations will be allocated additional bedrooms

This is a rather neutral and objective method for determining subsidy standards and does not appear to raise any fair housing issues.

Housing for People with Disabilities

Background

An estimated 13% of the U.S. population had a disability as of the American Community Survey Five-Year Estimates for 2018 to 2022. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.³⁵

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships, as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Modifications and assisted living arrangements tend to pose significant costs for people with disabilities, who already experience more difficulty affording housing compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.³⁶

An estimated 11,717 people in Gastonia have a disability, representing 14.8% of the total population. Seniors (age 65 or older) have the highest disability rate at 36.7%. In contrast, the rate for those aged 18 to 64 is 13.9%, and just 3.7% of children under age 18 have a disability. In Gaston County, the share of residents with a disability is slightly lower for working-aged adults (12.9%) but slightly higher for children (4.0%). Rates for seniors are the same in both the City and County.

³⁵Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

³⁶America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

TABLE 21. DISABILITY BY AGE GROUP

Age of People with Disabilities	GASTONIA		GASTON COUNTY	
	#	%	#	%
Age 0 to 17 with Disabilities	748	3.7%	2,502	4.0%
Age 18 to 64 with Disabilities	6,625	13.9%	17,956	12.9%
Age 65+ with Disabilities	4,344	36.7%	13,378	36.7%

Data Sources: 2018-2022 5-Year American Community Survey, Table S1810

NOTE: All % represent a share of the total population within the jurisdiction or region within each age group.

Ambulatory disabilities are the most common type in both the city and the county, affecting just over 8% of the population in both geographies. Cognitive and independent disabilities are the next most common disabilities, impacting about 5% of the population. Hearing and vision difficulties impact around 3-4% of the population in both the City and County, while self-care difficulties are least common disability types affecting 2.6-2.7% of the population in both jurisdictions.

TABLE 22. DISABILITY BY TYPE

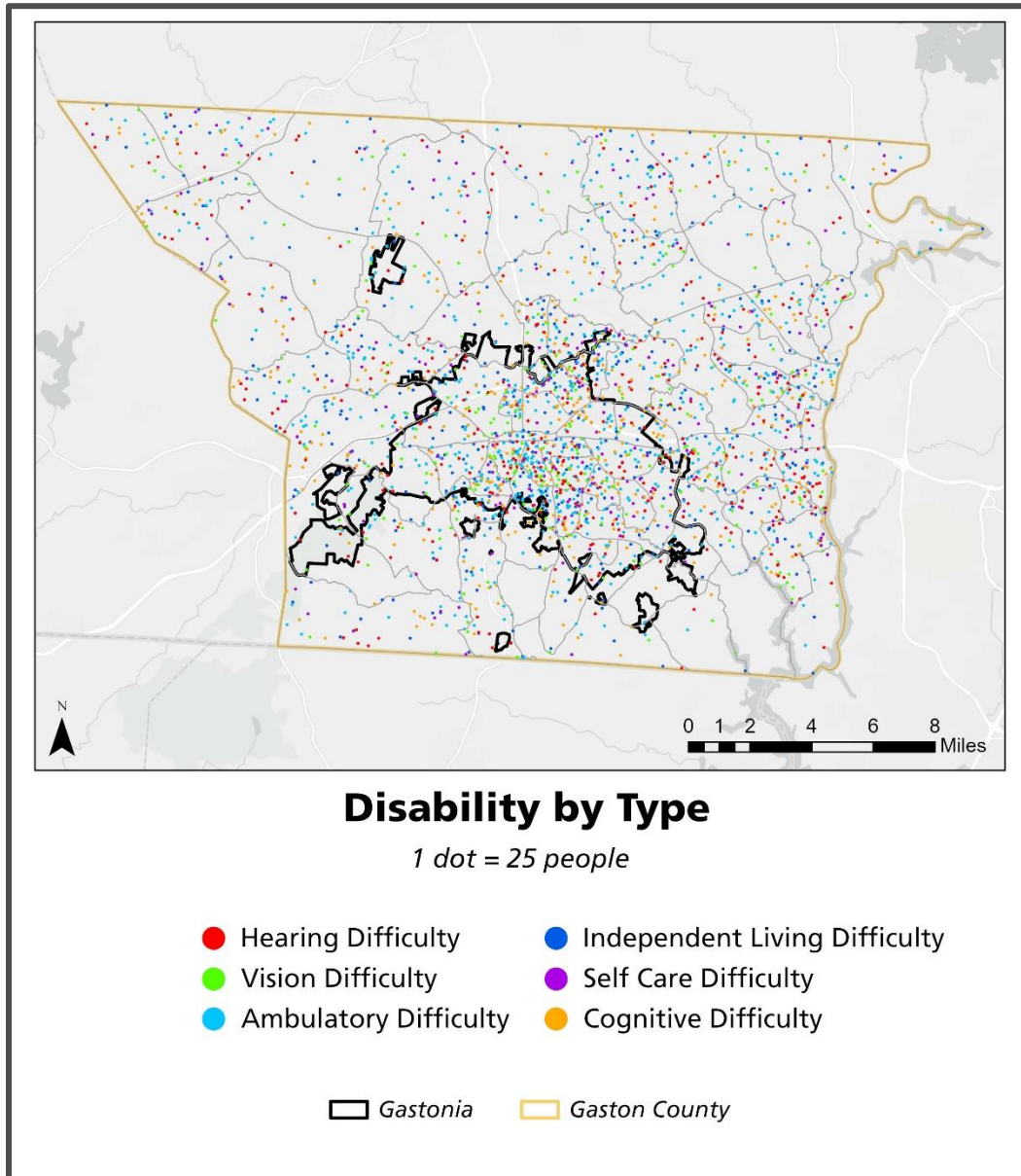
Disability Type	GASTONIA		GASTON COUNTY	
	#	%	#	%
Ambulatory Difficulty	6,658	8.4%	18,405	8.1%
Independent Living Difficulty	4,344	5.5%	12,002	5.3%
Cognitive Difficulty	4,257	5.4%	12,316	5.4%
Hearing Difficulty	3,018	3.8%	9,410	4.2%
Self-Care Difficulty	2,533	3.2%	6,528	2.9%
Vision Difficulty	2,044	2.6%	6,188	2.7%
Total Population with a Disability	11,717	14.8%	33,386	14.7%

Data Sources: 2018-2022 5-Year American Community Survey, Table S1810

NOTE: All % represent a share of the total population within the jurisdiction or region.

The spatial distribution of residents with disabilities is similar to that of the City’s total population. Although there is slight clustering notable within the south-central portion of the City, this may be explained by the fact that overall residential density is highest in this area.

FIGURE 47. DISABILITY BY TYPE



Source: 2018-2022 ACS Table S1810

Accessible Housing Supply and Affordability

Any new multifamily housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision / hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

A search for affordable elderly and special needs housing using HUD’s Resource Locator tool was conducted to identify affordable rental properties in Gastonia designed to serve the elderly or people with disabilities. The search returned seven multifamily properties in Gastonia that offer affordable housing through the Section 811 Supportive Housing for Persons with Disabilities program and eight properties that offer affordable housing to the elderly through the Section 202 Supportive Housing for the Elderly, and three additional units that offer subsidized housing services to elderly or disabled residents outside of Section 202 or Section 811 programs. The properties and their number of accessible units are displayed in the table below.

TABLE 23. AFFORDABLE ELDERLY AND SPECIAL NEEDS HOUSING IN GASTONIA

	Section 811	Section 202	Elderly non-202	Efficiency units	1 bed units	2 bed units	3-4 bed units
Hoffman Homes			X	0	0	45	36
ARC/HDS Gaston County Apartments		X		0	6	2	0
ARC/HDS Gaston County Group Home #7	X	X		5	0	0	0
CAC of Gaston County	X			0	10	0	0
Stonecroft Village Apartments			X	0	12	28	32
A.R.P. Manor		X		0	100	0	0
WNC Community Homes #9	X			0	6	0	0

Catherine Booth Gardens		X		0	82	0	0
Kinross Place	X			0	12	0	0
ARC/HDS Gaston County Group Home #6	X			5	0	0	0
ARC/HDS Gaston County Group Home #2		X		0	5	0	0
ARC/HDS Gaston County Group Home #5	X			5	0	0	0
ARC/HDS Gaston County Group Home #4		X		6	0	0	0
Mountain Ridge Group Home	X			6	0	0	0
WNC Community Homes #5		X		6	0	0	0
Village Square Apartments			X	0	130	20	0
Ric Redbud Apartments		X		0	8	0	0
TOTAL UNITS				33	371	95	68

As shown in the above table, the most common unit size is a one-bed apartment, followed by a two-bed and then a three- or four-bed unit. The least common unit size is an efficiency or studio unit. It is important to note that unit counts reflect total existing units, not current unit availability.

According to the Social Security Administration, the standard Supplemental Security Income (SSI) payment for the year 2024 is \$943.00 per month. Affordable rent for an individual receiving this monthly income would be \$282.90. It is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing, therefore, is often a key source of accessible and affordable housing for people with disabilities.

The share of residents with a disability residing in publicly subsidized housing in Gastonia and in Gaston County are shown below. In both the City and the county, the share of residents with a disability living in Section 811 units and units paid for with a Housing Choice Voucher is significantly higher than the average disability rate. In Gaston County Project-Based Section 8 residents also show a disproportionately high disability rate; however, in Gastonia, this category has a disability rate slightly below average. As Section 811 housing is reserved for disabled residents, a high disability rate is expected here; however, higher than average disability rates in other categories may indicate that disabled residents are more likely to need low-income housing assistance than non-disabled residents. The disability rate for Section 202 housing, which is reserved for the elderly, is markedly lower than the average disability rate for this age group, indicating that disabled elderly individuals are likely residing either with family or in non-HUD care facilities.

TABLE 24. DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	SHARE OF RESIDENTS WITH A DISABILITY	
	Gastonia	Gaston County
Public Housing	N/A	9%
Project-Based Section 8	9%	17%
Section 811 Housing	94%	95%
Section 202 Housing	3%	2%
HCV Program	22%	22%

Data Sources: HUD APSP data, 2021 based off 2010 Census.

Zoning and Accessibility

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government's police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc. Conditions of Gastonia's zoning code affecting accessibility are assessed in this section. Several elements of the following analysis refer back to the zoning code review presented in Chapter 6.

The Definition of "Family" and Group Housing for Persons with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations. The City of Gastonia defines "family" under its Unified Development Code (UDC) to include "an individual, or two or more persons related by blood, marriage or adoption...or a group of not more than six persons who need not be related by blood, marriage, or adoption living together as a single housekeeping unit." Under this definition, foster care and other guardianship relationships are not treated as equally related as relationships by blood or marriage or adoption, which is problematic under due process scrutiny. Further, limiting a family to no more than 6 unrelated individuals is neither the most permissive nor most restrictive under case precedent, but does fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood or marriage, and may violate fair housing, privacy, and due process protections if challenged.

More permissive and neutral definitions of family do not distinguish between related and unrelated occupants as long as the residents live together as a functionally or factually equivalent family or common household sharing common space, meals, and household responsibilities, and/or leave maximum occupancy per dwelling as a matter of safety under occupancy standards rather than the zoning regulations. While the Supreme Court has recognized a local government's right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state Due Process and/or the federal FHAA as it may have a disproportionate impact on people with disabilities, minorities, and families with children. Another option is to amend the ordinance to add an administrative process for rebutting the presumption that a group exceeding the permitted

maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family. Accordingly, Gastonia received a “2/medium risk” score on Issue 1 of the matrix.

The family definition does not distinguish between or treat persons with disabilities differently because of their disability, rather supportive housing services for persons with disabilities are regulated under the term “family care home.”

A “family care home” is a defined use under North Carolina state law and Gastonia’s local code referring to a home with support and supervisory personnel that provides room and board, personal care, and habilitation services in a family environment for up to 6 residents with disabilities (or unwed mothers and their babies or battered persons with their children). Under state law, a family care home “shall be deemed a residential use of property for zoning purposes and shall be a permissible use in all residential districts of all political subdivisions. No political subdivision may require that a family care home, its owner, or operator obtain, because of the use, a conditional use permit, special use permit, special exception or variance from any such zoning ordinance or plan; provided, however, that a political subdivision may prohibit a family care home from being located within a one-half mile radius of an existing family care home.” (N.C.G.S. § 168-22.) Under Gastonia’s UDO, a family care home (for up to 6 residents) is an expressly permitted use in all residential districts and in the TMU, O-1, OLC, UMU, and C-1 districts, which is consistent both with its definition of “family” and with state law regarding zoning of family care homes.

Under Gastonia’s UDO, a “group home” is a licensed home for 7-30 residents requiring support and supervisory care services. Group homes are permitted with supplemental regulations in the OM, O-1, and OLC mixed-use districts and as a conditional use in the UMU, C-1, and CBD districts. However, this is not more restrictive than similarly situated housing for 6 or more unrelated individuals not requiring in-home, supportive services for disabilities. Gastonia received a “1/low risk” score for Issue 2.

However, on Issue 4 regarding spacing / dispersion requirements for certain types of housing, Gastonia received a “2/medium risk” score. Under state law, a political subdivision may—but is not required to—prohibit a family care home from being located within a one-half mile radius of an existing family care home. Gastonia imposes a one-quarter (1/4) mile spacing limitation between family care homes unless a special exception for reduced separation is granted by the BOA following the public hearing process.

The UDO provides, “The BOA must consider whether reduced separation will result in further clustering of family care homes that could promote the cloistering and isolation of handicapped persons instead of the integration and interaction of handicapped persons with the community mainstream.” Although the spacing requirement is written in such a way as to protect persons with disabilities from being concentrated and segregated in limited areas of the city, where a certain number of unrelated persons are permitted by local ordinance to reside together in a home, the

spacing requirement against unrelated persons residing in a family care home could violate the FHAA because it would be a condition imposed on persons with disabilities that is not imposed on similarly-situated, unrelated persons without disabilities.

Spacing requirements for protected classes like persons with disabilities are generally inconsistent with the FHAA, unless the jurisdiction could make a showing that the ordinance was passed to protect a compelling governmental interest (e.g. over-concentration of residential treatment homes could adversely affect individuals with disabilities and would be inconsistent with the goal of integrating persons with disabilities into the wider community) and that the spacing requirement is the least restrictive means of protecting that interest. The City's spacing/dispersion requirements limit the overall aggregate capacity of housing for persons with disabilities even if the need in the community or region is greater than the thresholds permit. It is recommended that a provision be adopted specifically directing providers of family care homes to an administrative process for requesting a reasonable accommodation or otherwise provide a means of rebutting the UDO's presumption of overconcentration by allowing the family care home to show the need for more housing for persons with disabilities through an administrative, rather than public hearing, process.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations' impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or "to afford persons with a disability the equal opportunity to use and enjoy a dwelling." (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHAA.) However, the FHAA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Gastonia has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Specified minor modifications may be administratively approved—for example to allow a ramp designed to accommodate handicapped persons to encroach into a required front, side, or rear yard. But otherwise, the jurisdiction would appear to rely on the variance process for reasonable accommodation matters with the Board of Zoning Adjustment holding power to hear and decide applications for variances following the public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities.

The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying

to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents. Accordingly, Gastonia received a “2/medium risk” score on Issue #3.

Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHAA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized administrative process.

Transitional Housing for Persons Requiring Supportive Services

The scope of the FHAA applies only to a “dwelling,” but the distinction between a covered dwelling and other types of facilities where people may seek shelter is not well defined. The Act defines a dwelling as “any building, structure, or portion thereof which is occupied as, or designed or intended for occupancy as, a residence by one or more families . . .” 42 U.S.C. § 3602(b). Courts that have adjudicated the issue have found that a residence/dwelling can be temporary or permanent as long as the occupant intends to return for some period of time rather than a transient visit. Although emergency shelters, hotels, hospitals, and prisons have been found to not qualify as a dwelling/residence for purposes of FHAA protections, other types of facilities viewed as “temporary” such as boarding homes, halfway houses, nursing homes, children’s homes, domestic violence shelters, drug rehabilitation centers, summer vacation rentals, and the like have been held to be dwellings under the FHAA. There is some precedent for applying the FHAA to homeless shelters as well. Courts assess whether a facility operates as or is intended as a residence by determining if the occupants (1) intend to remain at the facility for a significant period and (2) view it as a place to return to during that period. Courts have found that a “significant period of time” is more than one would typically stay in a hotel but can still be temporary, even as little as two weeks. Where the housing serves classes of persons protected by the FHAA, it cannot be excluded from residential zones unequally to other types of dwellings.

Gastonia’s UDO defines a “transitional housing facility” as one that provides support services, such as counseling, on an ongoing basis to residents to assist with needs such as homelessness, employment, health and behavioral matters, and life skills. It must be “operated and funded by a nonprofit, charitable, religious, or governmental organization that provides temporary housing, which may also include meals, to not more than twelve (12) persons.” In this case, temporary means limited to 90 days or “a progressing (stepped) program toward client independence that does not

exceed eighteen (18) months.” Gastonia’s UDO limits the siting of “transitional housing facilities” to the C-2, C-3, and IU zones only, and thereby excludes such facilities from the other residential districts. The transitional housing facilities contemplated by the UDO could meet the scope of protected temporary dwellings under the FHAA, and therefore their complete exclusion from residential zones may have a disproportionate impact on persons with disabilities, persons of color, families with children, or other protected groups and may violate the FHAA under certain applications and be open to challenge. Accordingly, Gastonia received a “3/high risk” score on Issue 5 of the matrix.

Supportive housing for persons recovering from alcohol or substance addiction

Under federal law (e.g., FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities. While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether, and such regulations must not be based on stereotypes or presumptions about specific types of disabilities.

The City of Gastonia’s zoning code does not make mention of specific regulations governing supportive housing for persons recovering from alcohol or substance addiction. Typically, in the absence of specific regulation, such housing would fall under ordinances governing other types of group homes. However, the City of Gastonia’s zoning code specifically excludes “current, illegal use of or addiction to a controlled substance” from its definition of handicapped persons. This, by default, excludes substance abuse treatment facilities from categorization as either family care homes or group homes, as both specify that they serve only “handicapped persons, unwed mothers with their neonates, and battered spouses with their children”. This presents a barrier to fair housing for individuals seeking recovery from alcohol or substance addiction, who are protected by the ADA.

Fair Housing Activities

Fair Housing Resources

In 1983, North Carolina adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, known as the State Fair Housing Act. Both the federal and state laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by the federal FHAA. While the State Fair Housing Act closely tracks the discriminatory acts prohibited by the federal FHA, it contains several key differences related to its prohibitions and exemptions.

For instance, the State FHA expressly provides that discrimination may be established by a showing of either: (1) disparate treatment (intentional discrimination), or (2) disparate impact (discriminatory effect). Although disparate impact has long been recognized as a viable theory of liability by the district and circuit courts of appeals that have considered it, and was affirmed by the U.S. Supreme Court in the Inclusive Communities lawsuit, this standard is more explicitly included within the language of the State FHA: “It is a violation of this Act if ...[a] person's act or failure to act has the effect, regardless of intent, of discriminating.”

Further, the State FHA covers certain single-family dwellings that are exempted under the federal FHAA. The federal FHAA exempts the sale or rental of a single-family home when (a) the owner does not own more than three single-family homes at any one time, and (b) the sale or rental is done without the use of advertising or a real estate broker. The State FHA does not provide for this exemption. The State FHA does exempt the rental of rooms in a private home occupied by the owner and also exempts the rental of a unit in a one- to four-unit building if the owner or one of the owner's family members occupies one of the units.

Currently, the State FHA does not extend protections to any other class of persons outside of those protected by the federal FHAA—sex, race, color, disability, religion, national origin, and familial status. However, in 2009, the N.C. General Assembly adopted amendments to the State FHA to include as an additional unlawful discriminatory housing practice for a local government to discriminate against “affordable housing” in land-use decisions or in the permitting of development. According to the Act, a local government “intends to discriminate” if, in making the decision, the local government “was motivated in full, or any part at all, by the fact that a development or proposed development contains affordable housing units for families or individuals with incomes below eighty percent (80%) of area median income.” A local government also may unlawfully discriminate if the act has the effect, regardless of intent, of discriminating against affordable housing. It is not a violation of this provision if the local land-use decision or permitting of development is based on considerations of limiting high concentrations of affordable housing or “if a local government whose action or inaction has an unintended discriminatory effect

proves that the action or inaction was motivated and justified by a legitimate, bona fide governmental interest.”

At times, and as recently as 2015, state lawmakers have proposed eliminating the state’s Human Relations Commission and the State Fair Housing Act, purportedly for budgetary reasons. However, the latest state budget leaves the Commission and Act in place for now.

In addition to the state Act, the City of Gastonia has adopted a local fair housing ordinance, Code of Ordinances Sec. 19-1 et seq. A local fair housing task force has the authority to “receive, initiate, investigate, seek to conciliate, hold hearings on and pass upon complaints, and to mediate alleged violations” of the ordinance. The fair housing agency may assess a penalty against the respondent and may seek enforcement of its orders from the Gaston County superior court. Gaston County has not adopted its own specific fair housing ordinance.

HUD has certified North Carolina’s State Fair Housing Act as “substantially equivalent” to the “rights, procedures, remedies, and the availability of judicial review” provided in the FHAA. Substantial equivalence certification allows the state fair housing enforcement agency to apply for federal funding under HUD’s Fair Housing Assistance Program (FHAP). HUD has designated North Carolina’s Human Relations Commission (under the Department of Administration) as a participating FHAP agency. The Commission, created by the legislature to administer and enforce the state’s antidiscrimination laws, partners with HUD and receives annual funding through the FHAP to receive, investigate, and enforce charges of housing discrimination.

Under its Fair Housing Initiatives Program (FHIP), HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

On August 31, 2023 HUD announced that for FY2018 it was awarding more than \$24 million through its FHIP grant program. Legal Aid of North Carolina, Inc. (LANC) has pledged to use its \$425,000 multi-year PEI (private enforcement initiative) grant to provide a full-service fair housing project to residents throughout North Carolina, targeting underserved populations including racial and ethnic minorities, people with disabilities, individuals with limited English proficiency, low-income rural residents, and families with children. LANC has used past funding to conduct intake on allegations of discrimination, provide fair housing counseling to households, refer cases to HUD, FHAPs, DOJ, courts, and private attorneys; provide direct advocacy to households to achieve policy changes; conduct market reviews; conduct systemic investigations; recruit and train testers; conduct rental test parts, sales test parts, D&C test parts, and lending test parts; monitor settlement agreements; conduct fair housing trainings (including for people with disabilities, for

rural residents, and for LEP communities); conduct Fair Housing Month Conferences; attend staff training; organize Fair Housing Working Group meetings; distribute brochures in English and three other languages; monitor online advertisements or publications; distribute PSAs to media outlets; conduct outreach to religious organizations; attract website views; and conduct CLE seminars (on fair housing litigation and fair housing and land use).

Fair Housing Lawsuits and Litigation

An individual in Gastonia or Gaston County who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the Human Relations Commission or with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident) or in state superior court within one year of the alleged discriminatory act. Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

Typically, once certified, HUD will refer complaints of housing discrimination that it receives back to the state or local FHAP agency for investigation, conciliation and enforcement activities except matters involving the legality of state or local zoning or other land use law are referred to the Department of Justice for further enforcement. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency's closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because the North Carolina Human Relations Commission is a certified FHAP agency, most complaints filed with the HUD FHEO office will be referred back to the Commission for investigation and enforcement.

For cases that remain within HUD's jurisdiction, the process goes as follows: after the FHEO receives a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, HUD must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO finds "reasonable cause," HUD must issue a "Charge of Discrimination." If the FHEO determines that there is no "reasonable cause," the case is dismissed. The advantages of seeking redress through the administrative complaint process are that HUD or the applicable FHAP agency takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and also impose civil penalties,

but unlike federal district court, may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

However, the aggrieved party or the respondent may elect to have the administrative proceeding terminated and the case instead adjudicated in federal court. The Department of Justice will prosecute the case on behalf of the aggrieved party. Additionally, the DOJ may bring suit on behalf of individuals based on referrals from HUD in the case of a “pattern or practice” of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. An aggrieved party may intervene in any action filed by the DOJ.

Like the federal FHEO complaint process, the State Human Relations Commission is empowered to receive complaints of alleged housing discrimination, investigate claims, subpoena witnesses and documents, seek conciliation and settlement between parties, conduct reasonable cause hearings, and commence civil actions in the appropriate county superior court to seek redress of unlawful housing discrimination.

If after investigation, conciliation efforts fail and the Commission finds no reasonable ground to believe that an unlawful discriminatory housing practice has occurred or is about to occur it shall dismiss the complaint and issue to the complainant a right-to-sue letter enabling him to bring a civil action in superior court. If conciliation efforts fail and the Commission finds there is reasonable grounds to believe an unlawful discriminatory practice has occurred, the parties may elect to have the issues adjudicated in superior court or the Commission may apply to the Director of the Office of Administrative Hearings for the designation of an administrative law judge to preside at a hearing of the case.

The advantages of seeking redress through the administrative complaint process are that administrative proceedings are generally more expedited than the federal court trial process, and the enforcement agency takes on the duty, time, and cost of investigating the matter and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

If an individual has evidence that his/her rights under the FHA or state fair housing law have been violated in a final land use or zoning decision, the aggrieved person may file a complaint with the Commission or with HUD, or file a lawsuit directly in state or federal court within the statute of limitations period. HUD refers matters involving the legality of state or local zoning or other land use law or ordinance to the Department of Justice for further enforcement.

Complaints Filed with HUD and/or North Carolina Human Relations Commission

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout North Carolina (as well as Alabama, Florida, Georgia, Kentucky, Mississippi, South Carolina, and Tennessee). The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

The North Carolina Human Relations Commission, under the Office of Administration, is tasked with ensuring equal opportunities in the areas of employment, housing, public accommodations, recreation, education, justice, and governmental services for all North Carolina citizens. The Commission has authority to enforce the State Fair Housing Act.

Requests were made to the North Carolina HUD field office and the North Carolina Human Relations Commission (NCHRC) for complaints received regarding housing units in Gastonia and Gaston County for the period January 1, 2018 through December 31, 2022. The Greensboro Field Office of the FHEO and the North Carolina Human Relations Commission maintain data reflecting the number of complaints of housing discrimination received, the status of all such complaints, and the basis/bases of all such complaints occurring in North Carolina. Responses from HUD and the North Carolina Human Relations Commission, detailed in the table on the following page, included complaints reported by both agencies as well as complaints reported with a single agency.

From January 1, 2018 to December 31, 2022, HUD reported the filing of nine complaints alleging housing discrimination; disability status (sometimes in combination with another protected characteristic) was a factor in six of the 10 complaints. Race was a basis in three cases, sex in two, national origin in one, and retaliation in one. The issues identified included: discriminatory terms, conditions, privileges, or services and facilities; failure to make reasonable accommodation; otherwise deny or make housing unavailable; discrimination in terms/conditions/privileges relating to rental; discriminatory advertising, statements and notices; discriminatory refusal to rent; discriminatory acts under Section 818 (coercion, Etc.); failure to permit reasonable modification; and discrimination in terms/conditions/privileges relating to sale.

Eight of the nine cases reported by HUD were also reported by the North Carolina Human Relations Commission. The Commission also reported an additional case not reported by HUD, so that 10 total cases filed from 2018 through 2022 were reported by HUD and/or the North Carolina Human Relations Commission.

All cases had no cause determination, meaning that the investigator assigned to the claim did not find any evidence that unlawful discrimination occurred, with the exception of one that did not have a cause for case disposition listed.

TABLE 25. COMPLAINTS RECEIVED BY HUD AND/OR NCHRC BY BASIS / PROTECTED CLASS STATUS

Basis	2018	2019	2020	2021	2022	Total
Race	0	1	0	1	1	3
National Origin	0	0	0	1	0	1
Religion	0	0	0	0	0	0
Sex	0	1	0	0	1	2
Disability	0	3	1	2	0	6
Familial Status	0	0	0	0	0	0
Retaliation	0	1	0	0	0	1
TOTAL NUMBER OF CASES FILED PER YEAR (WHICH MAY INCLUDE MORE THAN ONE BASIS OF DISCRIMINATION PER COMPLAINT)	0	4	1	4	1	10

Fair Housing Enforcement through Civil Litigation

As an alternative to pursuing remedies through the administrative process, an aggrieved person may commence a civil action in an appropriate U.S. district court within two years as long as the parties have not already entered into a conciliation agreement or, following a reasonable cause determination, an administrative hearing has not already commenced. Where an administrative action also has been filed, the two-year statute of limitations for filing a civil lawsuit is tolled during the period when HUD or the “substantially equivalent” agency is evaluating the complaint. By pursuing judicial remedies, the plaintiff has the potential to collect punitive damages in addition to compensatory damages and injunctive relief, and settlement and damages awards are generally higher for successful plaintiffs in civil court than those mediated through the administrative process. Fair housing lawsuits may be filed against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

A victim’s right under the North Carolina Fair Housing Act to pursue first or simultaneously a civil action in state superior court is less clear. Even though HUD has designated the North Carolina FHA (N.C. GEN. STAT. § 41A et seq.) as “substantially equivalent” to the federal act, the NCFHA omits the language from the federal act that a party has an express right to directly “commence a civil action

in an appropriate United States district court or state court.” Rather, the NCFHA refers to various situations where a civil action may be pursued but only within the context of the administrative enforcement process—i.e., after the North Carolina Human Relations Commission makes a no reasonable cause determination, after conciliation efforts have failed, or after a final agency decision following a hearing. (See N.C. GEN. STAT. § 41A-7 et seq.). In North Carolina, a complainant has one year from being issued a “right-to-sue” letter from the N.C. Human Relations Commission if the Commission declines to find reasonable cause or is unable to resolve the conflict through conciliation. The statute’s language creates an assumption that the NCFHA may require a plaintiff to exhaust administrative remedies before pursuing an action in court. There is very little published state court opinion adjudicating the NCFHA. However, when this same disparity between choice of forum rights under the federal FHA and the Florida FHA put into jeopardy Florida’s substantial equivalence standing and the Florida Commission’s eligibility as a certified enforcement agency, the Florida state legislature amended the Florida FHA (HB 175) in 2020 to make explicit that the Commission and aggrieved complainants do not have to first exhaust administrative remedies before filing an action in civil court.

Requiring an aggrieved party to first exhaust administrative remedies limits his or her choice of forum. This limitation may delay justice and negatively impact a plaintiff’s potential settlement or damages amount while have a chilling effect on victims seeking redress for discrimination.

The Department of Justice, based on referrals from HUD, may also initiate a civil action in federal court on behalf of persons injured by discriminatory housing practices where the government has reasonable cause to believe that:

- a person or group of persons is engaged in a pattern or practice of housing discrimination
- the alleged discrimination raises an issue of particular importance to the public interest
- when there has been a breach of a conciliation agreement.

An aggrieved party may intervene in any action filed by the DOJ.

For the previous five-year period, there was found one significant fair housing lawsuit filed and/or adjudicated between January 2019 and December 2023 involving or affecting parties in Gastonia and which may impact fair housing choice within the jurisdiction. On May 9, 2019, the Department of Justice filed United States v. Miller-Valentine Operations, Civil Action No. 1:19-cv-0346 (S.D. Ohio), on behalf of tenants with disabilities against Ohio-based Miller-Valentine Operations Inc. and its affiliated companies, owners, developers, and builders of 82 multifamily housing complexes in 13 states, including the Madison Place Senior Apartments in Gastonia, NC.

Following its investigation, the government alleged that defendants had engaged in a pattern or practice of discrimination by failing to meet the FHA’s accessible design and construction standards for covered multifamily units and the ADA’s accessible public facilities standards affecting approximately 3,000 FHA-covered units across the 82 complexes. Many of the multifamily

complexes were built with federal Low-Income Housing Tax Credits or with financial assistance of other federal government programs and yet defendants failed to make them accessible to persons with disabilities. The government's investigation found significant accessibility barriers including steps leading to building entrances; non-existent or excessively sloped pedestrian routes from apartment units to site amenities (e.g., picnic areas, dumpsters, clubhouse/leasing offices); inaccessible parking; inaccessible bathrooms and kitchens; inaccessible door hardware; and insufficient maneuvering space at unit entrances and entrances to common use areas.

Before going to trial, the parties entered a settlement agreement on July 28, 2020, requiring the defendants to take extensive corrective actions and retrofits at all 82 properties to make the complexes accessible to persons with disabilities. The defendants also agreed to pay \$400,000 into a victims' settlement fund to compensate individuals with disabilities who were harmed by the accessibility violations and to pay \$75,000 in civil penalties to the government. The settlement requires the defendants and their employees and agents to receive FHA and ADA training, to take steps to ensure that future multifamily housing construction complies with these laws, and to provide periodic reports to the Justice Department for three years.

The Consent Order, approved by the court on August 27, 2020, resolved one of the largest housing accessibility cases in the DOJ's history of enforcing the FHA's accessible design and construction standards, and its terms illustrate the government's twofold aims of ensuring corrective actions to remedy past discriminatory acts and future deterrence of barriers to equal access to housing.

Past Fair Housing Goals and Related Activities

The City of Gastonia completed an Analysis of Impediments to Fair Housing Choice in 2019, which identified five fair housing impediments. The fair housing issues were each paired with their associated contributing factors. The identified impediments were divided into two categories – private sector and public sector – and remedial actions to address each. The impediments and recommended activities from the 2019 AI are shown below, along with progress made toward addressing them over the last five years.

Impact of Past Fair Housing Activities on Goal Setting

Since 2020, Gastonia has made progress on recommendations related to each of the concerns and impediments identified in its previous AI (see Table 26). Based on this experience and input received during the community engagement for development of this AI, the City anticipates focusing more on increasing access to fair housing resources and information among residents, including those that are particularly vulnerable to discrimination; improving access to affordable and accessible housing; addressing homelessness; and improving access to opportunity in the city. As of 2023, the City has completed an Affordable Housing Plan which is working to actively implement and addresses some of the previous goals identified in the 2020 AI. Additionally, in

November 2022, the City implemented its Multi-Family Housing Policy to encourage more housing for low-to moderate- income families.

TABLE 26. ACTIONS TAKEN TO ADDRESS PREVIOUSLY IDENTIFIED FAIR HOUSING ISSUES

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
<p>#1: Affordable Housing Needs Disproportionately Impact Protected Classes</p>	<p>• Limited supply of affordable housing disproportionately impacts households of color</p>	<ol style="list-style-type: none"> 1. Continue using HOME and CDBG funds to increase and maintain the availability of affordable rental and for-sale housing in the city and county through new construction and rehabilitation, including by working with local CHDOs. Consider ways CDBG funding may be used for infrastructure improvements that would enable the development of new affordable rental or for-sale units. (Ongoing, beginning Q3 2019). 2. Review North Carolina’s allocation process for Low Income Housing Tax Credits (LIHTCs) to identify ways the City may be able to impact the competitiveness of developers’ applications, including local nonprofit developers. For developers proposing LIHTC projects in areas with access to key community resources/opportunity factors or areas experiencing a loss of affordable rental units, work with them to increase the competitiveness of their applications through letters of support, provision of information, and other assistance. (Ongoing, beginning Q1 2020) 3. Monitor rent levels, home prices, and property taxes in Gastonia neighborhoods at risk for gentrification. As redevelopment occurs, consider ways to encourage the development of mixed-income housing or to incentivize the inclusion of affordable housing units. (Ongoing, beginning Q3 2019). 	<p>In November 2023, the City of Gastonia completed and published an Affordable Housing Plan which it is working to actively implement. This plan serves as the blueprint for housing and to address some of the previous goals identified in the 2020 AI.</p> <p>In November 2022, the City of Gastonia implemented a Multi-Family Housing Policy to encourage housing for more low-to moderate- income families.</p>

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
	Racial disparities exist in the occupancy of some publicly supported housing developments	1. GHA and, where applicable, the private property managers of properties containing Project-Based Section 8 units should review their Affirmative Marketing Plans and consider new and creative marketing techniques to reach applicants of a wide variety of backgrounds. (Q2, 2020).	
	Zoning in the City of Gastonia limits as-of-right multifamily density	1. The zoning ordinance and table of permitted uses should be reviewed to consider where allowances for denser as-of-right multifamily development may be made. (Q4, 2020).	

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
<p>#2: Uneven access to opportunity.</p>	<p>Need for neighborhood revitalization and improvements in underserved areas of the city.</p>	<ol style="list-style-type: none"> 1. During the Consolidated Planning process, the City should identify place-based strategies focused on improving physical resources and building human capital in specific, defined high-poverty areas. (Q3, 2019) 2. Continue to fund projects that address unsafe property conditions, sidewalks, and public facilities. (Q3, 2019) 3. Address adult education needs in areas such as employment readiness, GED classes, or job training programs designed to serve residents living in high-poverty areas. (Q3, 2019) 4. Consider a place-based strategy in the Consolidated Plan to provide business and entrepreneurial support to new or expanding businesses that fill a market niche and create jobs for low-income residents. (Q3, 2019) 	<ul style="list-style-type: none"> •
	<p>Transit service hours limit job opportunities for transit-dependent workers.</p>	<ol style="list-style-type: none"> 1. Explore potential funding opportunities for limited expansion of transit service past 6:30 pm to better connect workers with jobs. (Q2, 2020). 	

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
<p>#3: Racial disparities exist in access to homeownership.</p>	<p>Smaller shares of African American households apply for home mortgage loans compared to white households.</p> <p>Home purchase and refinance loan applications by African American and Latino households are more likely to be denied than those by white households.</p>	<ol style="list-style-type: none"> 1. Continue using CDBG funding to support homebuyer education classes that connect graduates with downpayment and closing cost assistance. Continue working with Gastonia Housing Authority to connect families in their Family Self Sufficiency program transition to homeownership. Offer homebuyer education and downpayment/closing cost assistance material in Spanish, with Spanish interpretation available if needed. (Ongoing, beginning Q4 2019). 2. Follow-up with homebuyer education class participants to identify barriers inhibiting home purchases and potential curriculum changes that may help address these barriers. (Ongoing, beginning Q4 2020). 3. Conduct outreach efforts to local lenders to discuss disparities in homeownership rates and lending access. Explore possibilities to recognize local lending institutions that have shown a commitment to expanding homeownership, possibly by working with graduates of the City's and other homebuyer education classes. (Ongoing, beginning Q2, 2020). 	<ul style="list-style-type: none"> •

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
<p>#4: Housing options for people with disabilities are limited.</p>	<p>The City’s zoning code restricts transitional housing facilities from all residential zoning districts.</p> <p>The City of Gastonia does not have a clear and objective process by which persons with disabilities may request a reasonable accommodation.</p>	<ol style="list-style-type: none"> 1. The zoning ordinance and table of permitted uses should be reviewed to consider where allowances for transitional housing facilities may be made within residential zoning districts. (Q4, 2019). 2. Draft and adopt local code amendments that would expand transitional housing facility sitting options and provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. (Q1, 2020). 	

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
<p>#5: Need for continued and expanded fair housing education activities.</p>	<p>Stakeholder input and survey responses indicate that more fair housing education is needed for the general public and housing industry professionals.</p>	<ol style="list-style-type: none"> 1. Design and coordinate delivery of a fair housing education program that reaches members of the public who are most vulnerable for housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities. Focus efforts on incorporating fair housing education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups. (Ongoing, beginning Q4 2019). 2. Raise awareness of the City of Gastonia Fair Housing Officer and Fair Housing Hotline by continuing to distribute posters, brochures, and other materials. Provide material in English and Spanish, with translation to other languages as needed (Ongoing, beginning Q4 2019). 	

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Gastonia since 2020
	<p>Some landlords take advantage of renters with limited housing options through discriminatory leasing practices and unfair or illegal leases.</p>	<ol style="list-style-type: none"> 1. As part of the City’s fair housing education program, develop a curriculum that helps prospective renters recognize discriminatory leasing practices and unfair or illegal lease terms. (Ongoing, beginning Q2, 2020). 2. Consider a fair housing testing program targeted toward identifying discrimination in the rental market. (Q4, 2020) 3. Offer a seminar focused on “Landlord Rights and Responsibilities” targeted to private landlords with units in Gastonia and Gaston County to review fair housing laws and best practices regarding tenant selection, accommodations for people with disabilities, lease terms, and other key topics. (Annually, beginning Q4, 2020) 	

Identification of Impediments

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 27, along with implementation timeframes and responsible parties.

Impediment #1: Limited Supply of Affordable Housing for Low- and Moderate-Income Households

A general lack of housing options affordable to low- and moderate-income households was one of the most frequently cited issues identified in our conversations with community members and stakeholders in Gastonia and Gaston County. This shortage has become increasingly dire over the past few years as housing costs in the area have drastically increased and wages have remained comparatively stagnant. Additionally, public housing assistance is limited, with existing resources are often coupled with waitlist periods of 1 year or more, source of income discrimination by area landlords, and housing quality issues. There is a great need for increased numbers of affordable multifamily units and assistance for low-income homebuyers.

Affordability is a problem affecting both owner and renter households in Gastonia and Gaston County. The 2023 Fair Market Rent for a 1-bedroom unit in Gaston County is \$1,180 (See Figure 41). To afford a 1-bedroom unit at \$1,180, a household would need to work a 40-hour week with a wage of at least \$22.69 per hour (\$47,200 annually). However, the minimum wage in North Carolina is only \$7.25, requiring a 125-hour work week to afford a \$1,180 lease without being cost-burdened. The median renter household income in Gaston County is \$41,326, which is lower than the necessary annual income to afford a one-bedroom unit at fair market rent.

An estimated 16.6% of households in Gastonia and 12.3% of households in Gaston County are severely cost-burdened, spending more than 50% of income on housing (see Table 14: Demographics of Households with Severe Housing Cost Burdens). Native American households in the city and county are disproportionately severely cost burdened (100.0% and 40.0% of households, respectively). Black households in the city and county and Asian households in the city also experience severe cost burden at higher rates (about 21% to 24% of households). In both jurisdictions, non-family households have higher rates of severe cost burden (26.8% and 21.3%, respectively) than do small and large family households.

Housing in Gastonia, Gaston County, and the Charlotte-Concord-Gastonia MSA is predominantly comprised of single-family detached structures (about 67% to 73% of units; see Table 8: Housing Units by Structure Type). Lack of diversity in housing types decreases the availability of housing affordable for low- to moderate-income households who are unable to afford single-family homes. Apartments and smaller, more affordable units are also essential for many seniors and residents with disabilities.

A similar impediment was identified in the City of Gastonia’s 2020-2024 Analysis of Impediments to Fair Housing Choice, and the City has made efforts to address this issue through development of strategies in the City of Gastonia Affordable Housing Plan, participation in Gaston County’s Homelessness Prevention Committee and development of the Intergovernmental & Interagency Task Force on Homelessness in Gaston County Report, planning for HOME-ARP funding to address homelessness and support affordable housing development, and continuation of programs such as the City’s Homebuyer Assistance Program. However, this challenge remains and is directly tied to impediments related to homelessness and a lack of housing options for residents with disabilities. Efforts to implement strategies to increase housing affordability, such as those contained in the recently approved Affordable Housing Plan and the Intergovernmental & Interagency Task Force on Homelessness in Gaston County Report, will be vital to increasing housing affordability in the city and county.

Impediment #2: Lack of Housing and Services to Address Homelessness

Residents and stakeholders who participated in this planning process consistently identified homelessness as one of the city and county’s most pressing issues. The 2023 Point in Time Count for the Gaston-Lincoln-Cleveland Continuum of Care identified 326 households experiencing homelessness in the three counties on a single night in January 2023, including 143 unsheltered households, 166 households in emergency shelter, and just 17 households in transitional housing. The Intergovernmental & Interagency Task Force on Homelessness in Gaston County Report (2021) identifies recommendations to address homelessness in the county, including the need to support the development of affordable housing; additional emergency, transitional, and permanently affordable housing for residents transitioning from homelessness; and additional collaboration across the County, its municipalities, housing and service providers, and the Continuum of Care.

A lack of housing and services for residents experiencing or at-risk of homelessness presents a barrier to fair housing, as people of color, residents with disabilities, and members of the LGBTQ+ community experience homelessness at disproportionate rates. The Intergovernmental & Interagency Task Force on Homelessness in Gaston County Report noted several populations that experience homelessness at disproportionate rates in Gaston County, including Black, American Indian or Alaska Native, severely mentally ill residents, and residents with chronic substance abuse. Members of the LGBTQ+ community have been found to two or more times as likely to experience homelessness as peers who do not identify as LGBTQ+.³⁷ Because homelessness disproportionately impacts these protected classes, a lack of housing and services to address homelessness constitutes a barrier to fair housing in the city and county.

³⁷ <https://williamsinstitute.law.ucla.edu/publications/lgbt-homelessness-us/>

Impediment #3: Limited Supply of Accessible Housing for People with Disabilities

Gastonia’s population has a disability rate of nearly 15%, higher than both the national average and the average for the state of North Carolina. The City’s population is also aging – since 2005, the share of the population aged 65 and up has increased by 22%, and disability rates increase with age. Residents with disabilities frequently have specialized housing needs, and research into the availability of suitable housing in Gastonia indicates that these needs may be going unmet. Disabled residents are also significantly more likely to live below the poverty line than non-disabled residents; Gastonia’s disabled population has a poverty rate of over 26%. This means that residents with disabilities face limited housing options relative to residents without disabilities, constituting a barrier to fair housing choice based on a protected class feature.

The following factors contribute to a lack of housing choice for residents with disabilities in Gastonia and Gaston County:

A higher-than-average disability rate coupled with insufficient accessible and affordable housing

Gastonia has a disability rate 13.8% higher than the overall U.S. disability rate, indicating that the city has a higher-than-average level of need for disability accessible housing. However, the City’s supply of disability-accessible units is insufficient to address the needs of the city’s population with disabilities: ACS data for 2022 estimates that 2,859 residents with disabilities are living below the poverty line in Gastonia, while HUD’s resource allocator tool shows that Gastonia has just 567 subsidized units for disabled and/or elderly residents. This means that existing disability-friendly housing in Gastonia only covers around 20% of the existing need, and as the population continues to age, the need will only grow.

Residents of Gastonia who participated in the community engagement process echoed these concerns, with 44% of respondents noting that a lack of senior or disability housing is a barrier to fair housing in the city and county. Over 60% of residents surveyed said that the city and county have a moderate to high need for more disability accessible housing, and over 75% said the same of senior housing. Residents and stakeholders noted a particular need for affordable family housing accessible to residents with disabilities, and for affordable, income-based cohousing neighborhoods for residents with intellectual or developmental disabilities that could support shared supportive services, programming and activities, and community spaces.

A strict and potentially discriminatory zoning code

One of the most often scrutinized provisions of a municipality’s zoning code is its definition of “family.” Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction’s definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations.

The City of Gastonia’s definition of family is fairly moderate, designating two or more persons related by blood or adoption, or up to six persons unrelated but living as a single household. Under this definition, foster care and other guardianship relationships are not treated as equally related as relationships by blood or marriage or adoption, which is problematic under due process scrutiny; however, the definition does allow for a household consisting of a disabled person with a live-in aide or caregiver to be considered family.

In regard to family or group care homes, the City’s spacing/dispersion requirements limit the overall aggregate capacity of housing for persons with disabilities even if the need in the community or region is greater than the thresholds permit. Although the City references that special exceptions may be granted to reduce spacing requirements, the process for obtaining such exceptions is vague and insufficient.

Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” Gastonia has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Specified minor modifications may be administratively approved—for example to allow a ramp designed to accommodate handicapped persons to encroach into a required front, side, or rear yard. But otherwise, the jurisdiction would appear to rely on the variance process for reasonable accommodation matters with the Board of Zoning Adjustment holding power to hear and decide applications for variances following the public notice and hearing process, and the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation. A variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. Because of this, the lack of a standardized administration process for reasonable accommodations for disabled residents may constitute a barrier to fair housing.

Finally, and perhaps most concerning, is the portion of the City of Gastonia’s zoning code that specifically excludes individuals using illegal substances from its definition of disabled individuals, which in turn excludes treatment facilities for such individuals from falling under family or group care home definitions. This presents a significant fair housing concern, as under federal law it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities. Gastonia’s exclusion of individuals with substance abuse issues from its definition of disability not only excludes treatment facilities from residential areas, it excludes them from the zoning code altogether – there is no mention of individuals with substance abuse

issues in the code other than to bar them from inclusion in family and group care homes. This presents a significant barrier to fair housing choice, as well as potential legal issue.

Impediment #4: Limited Incomes and Lack of Access to Resources Restrict Housing Choice Among Protected Classes

Low levels of access to resources and services create barriers to access to opportunity in Gastonia and Gaston County. The need for neighborhood investment is particularly acute in parts of central Gastonia where there is a high concentration of minority populations and racially/ethnic concentrations of poverty.

Labor Market Engagement: Residents of central Gastonia and west Gaston County tend to have the lowest levels of educational attainment, while educational attainment tends to be highest in southeast Gastonia and east Gaston County. Unemployment is highest in central and west Gastonia, including in the city's RECAPs. Unemployment is highest among residents of two or more races (7.5%), Hispanic or Latino residents (7.1%), and Black residents (6.4%). 40.0% of survey respondents identified limited access to jobs as a fair housing barrier in Gastonia and Gaston County.

Schools: Census tracts that rank lowest on HUD's School Proficiency Index are clustered in west Gaston County. School performance is also low in two tracts in Gastonia. These tracts rate between 2 and 18 on HUD's School Proficiency Index, while the highest performing schools, rated between 80 and 96, are located in northeast and southeast Gaston County.

Transportation: Combined housing and transportation costs tend to make up of the greatest expense for a household in the southeast part of the county which is furthest from the Gastonia transit service area which only operates within city limits. The combination of lower proximity to jobs and transit and higher shares of household income spent on transportation presents barriers to obtaining and maintaining employment and housing.

Food: USDA Food Research Atlas data indicates that the share of residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in the northeast census tracts of Gastonia where 92% to 100% of households have low incomes and low access. Several tracts throughout Gaston County also have a high concentration of low-income households with low access to grocery stores which may be attributed to lower density and sprawl.

Healthcare: The proportion of residents who are uninsured is highest in and near the R/ECAPs in Gastonia where there is a higher concentration of minority populations as well as tracts west of the city. More than 18% to 26% of the population in these areas are uninsured.

Together, these measures indicate that a lack of access to high-quality community facilities, resources, and services in some areas of the county restrict access to fair housing choice by limiting opportunity for residents. To address disparities in community resources and associated lack of

access to opportunity, meeting attendees, survey respondents, and stakeholders interviewed during this planning process emphasized the need for continued investment in neighborhood services, facilities, and infrastructure in these communities.

Impediment #5: Lack of Resources and Coordination for Fair Housing Outreach, Education, and Enforcement Activities Limits Residents' Access to Fair Housing Services

While the vast majority (86.2%) of respondents to the community survey indicated that they are aware of or somewhat aware of their rights under the Fair Housing Act, more than half (65.5%) noted that they did not know where to file a housing discrimination complaint. Existing fair housing organizations, while competent and effective, serve a statewide area and are not able to provide much specific focus on addressing fair housing needs in Gastonia. By setting aside a portion of its annual CDBG funds as a subgrant available to one of these existing fair housing organizations, the City can condition the subgrant on the receiving organization providing outreach, education, and enforcement activities within Gastonia.

Outreach should include programs providing information to landlords and tenants on rights, responsibilities, and best practices for maintaining a positive relationship. Ideally, such events would be offered in conjunction with or as a complement to existing community events to encourage greater attendance. Legal Aid of North Carolina maintains a Landlord and Tenant Law Manual that could be a helpful planning and curriculum resource.

Given that vulnerable households, including protected classes, in Gastonia have disproportionate housing problems, the need for information regarding assisted housing, Housing Choice Vouchers, housing rehabilitation programs, and fair housing in accessible, user-friendly formats is crucial. To expand the availability of such information, the City should translate relevant material into Spanish and work with partner organizations to promote affordable housing opportunities and fair housing resources to residents, including Spanish speakers with limited English proficiency. Additionally, specific information relating to the process of evictions, what constitutes as discrimination by a landlord, and what protections exist to tenants is crucial to disseminate through easily accessible manuals online, hotlines, or workshops. The development of a one-stop-shop Housing Resource Center can also support improved access to fair housing resources for residents.

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TABLE 27. FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
IMPEDIMENT #1: Limited Supply of Affordable Housing for Low- and Moderate-Income Households		
Need for additional funding to support affordable housing development	<ul style="list-style-type: none"> • Implement funding strategies contained in the City of Gastonia Affordable Housing Plan, including develop an Affordable Housing Trust Fund, to support development of affordable housing and programs to increase housing affordability (Ongoing, 2024). • As detailed in the Affordable Housing Plan, use the Affordable Housing Trust Fund to make loans and provide other kinds of financing facilities to help affordable housing projects become reality, including by providing gap financing for Low Income Housing Tax Credit (LIHTC) multifamily rental communities (2024). • Implement an Affordable Housing Bond to fund affordable housing development and other programs recommended in the Affordable Housing Plan, including homeownership, repair and rehabilitation, rental assistance, land acquisition, and seed money for a community land trust (2024). 	<ul style="list-style-type: none"> • City of Gastonia • Affordable housing developers • Low-Income Housing Tax Credit developers • Residents and stakeholders
High land costs present a barrier to affordable housing development	<ul style="list-style-type: none"> • Implement the land disposition policy contained in the City of Gastonia Affordable Housing Plan, making affordable housing a priority when disposing of public land and deploying City-owned land in partnership with affordable housing developers and community-based organizations to support affordable housing development (2024). 	<ul style="list-style-type: none"> • City of Gastonia • Affordable housing developers • Community-based organizations
Need for permanently affordable housing options and infill development on City-owned land	<ul style="list-style-type: none"> • Implement the recommendations contained in the Affordable Housing Plan regarding development of a Community Land Trust (2024). • Meet with other North Carolina cities that have implemented City-sponsored Community Land Trusts to understand the role the City might take in developing a CLT, including facilitating the process of forming a CLT and providing financing through funding and land resources to help get it started (2024). 	<ul style="list-style-type: none"> • City of Gastonia • Affordable housing developers • Community stakeholders

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
	<ul style="list-style-type: none"> Develop a plan for implementing a Community Land Trust model over the next three years (Ongoing, 2024). 	<ul style="list-style-type: none"> North Carolina cities with Community Land Trusts Residents and stakeholders
Lack of knowledge of and access to housing programs and resources	<ul style="list-style-type: none"> As detailed in the Affordable Housing Plan, develop a Housing Resource Center to be a one-stop-shop for housing-related resources such as housing counseling, housing referrals, rental assistance, resource navigation, homeless services, eviction diversion, legal assistance, landlord-tenant mediation, healthy homes programs, and others (2024). Continue to fund and expand City and community-based housing initiatives, including homebuyer assistance, asset-building, fair housing training, eviction assistance, and other programs (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia Legal Aid of North Carolina Continuum of Care Community-based organizations Residents and stakeholders
Zoning code limits development of missing middle and affordable housing types	<ul style="list-style-type: none"> Address how zoning regulations limit missing middle and multifamily housing types by considering proactively upzoning lower density areas and acreage to zoning districts that allow parcels to be subdivided and allow a greater diversity of housing types by right, rather than waiting on developers to seek rezoning of specific parcels; implementing jurisdiction-wide upzoning that opens more neighborhoods to townhomes, duplexes, and small apartment buildings by-right; reducing minimum lot sizes; upzoning more acreage to medium and high density multifamily and mixed-use zones; adopting minimum density requirements (especially around transit nodes and commercial and public services); and rezoning underutilized industrial and/or commercial areas for adaptive residential use (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia Community-based organizations Residents and stakeholders

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
	<ul style="list-style-type: none"> • Adopt an ordinance permitting accessory dwelling units in single-family residential areas. The ordinance should restrict the use of ADUs to affordable rental housing. Consider opportunities to expand ADUs by incentivizing development with programs that offer construction grants/ low interest/no interest loans; assistance with design, construction, and permitting process; and fee waivers (Ongoing, 2024). • Investigate the potential for adopting a mandatory or voluntary inclusionary zoning ordinance, including what has worked for other North Carolina jurisdictions within the framework of state law (Ongoing, 2024). • Consider using conditional zoning in targeted opportunity areas to boost affordable housing set-asides in new developments. Approval could include agreement on a specified percentage or number of units of affordable housing or commitments to make payments to the Affordable Housing Trust Fund in exchange for development concessions and incentives that lower the developer’s costs of production (Ongoing, 2024). 	
IMPEDIMENT #2: Lack of Housing and Services to Address Homelessness		
Need for additional emergency shelter and transitional housing, wraparound services, homelessness prevention/ diversion services, and permanently affordable housing	<ul style="list-style-type: none"> • Work with partners to implement recommendations in the Intergovernmental & Interagency Task Force on Homelessness in Gaston County Report, including allocating American Rescue Plan Act funding towards non-congregate short-term emergency shelter such as hotels, motels, and dorm rooms; allocating County and municipal funding to fund Homelessness Prevention Coordinator or Housing Navigator; pursuing long-term public-private partnerships to fund affordable housing development; and establishing a housing trust fund or other funding mechanism to collect and receive dollars from both governments and the general public for the explicit purpose of constructing affordable housing, among other recommendations (Ongoing, 2024). • Use HOME-ARP and other funding sources to develop emergency, transitional, and permanent housing options with wraparound services for residents experiencing 	<ul style="list-style-type: none"> • City of Gastonia • Gaston County • Gaston County municipalities • Continuum of Care • Homelessness Prevention Committee • Community partners

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
	homelessness. Consider co-housing, shared housing, or tiny home models to increase affordability, social interaction, and development of community (Ongoing, 2024).	
Need for continued and expanded collaboration around homelessness and housing affordability	<ul style="list-style-type: none"> Continue to partner with the Gaston County Homelessness Prevention Committee to implement recommendations in the Intergovernmental & Interagency Task Force on Homelessness in Gaston County Report and other strategies developed by subcommittees (Ongoing, 2024). Collaborate with Gaston County and municipalities to examine and implement changes in zoning codes and regulations to support development of more affordable housing types, such as missing middle housing, smaller housing options, multifamily development, shared housing, co-housing, and tiny homes; support nonprofit capacity and coordination; and increase access to wraparound services (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia Gaston County Gaston County municipalities Continuum of Care Homelessness Prevention Committee Community partners
IMPEDIMENT #3: Limited Supply of Accessible Housing for People with Disabilities		
A higher-than-average disability rate coupled with insufficient accessible and affordable housing	<ol style="list-style-type: none"> Use funding from the Affordable Housing Trust Fund or Affordable Housing Bond to support development of affordable housing accessible to residents with disabilities, including cohousing communities with shared services and community spaces for residents with intellectual and developmental disabilities (Ongoing, 2024). Require units developed with Affordable Housing Trust Fund, Affordable Housing Bond funding, or other City funds to meet Universal Design requirements, such as such as no-step entryways, one-story living, open floor plans, ramps, wider doorways and hallways, varied counter heights, soft-closing drawers and cabinets, automated lighting, lever-style handles, rocker panel switches, and non-slip surfaces (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
	<ol style="list-style-type: none"> 3. Work with affordable housing developers and community partners to support the development of Section 202, Section 811, or other dedicated senior or disability housing (Ongoing, 2024). 4. Create programs or expand existing programs, such as the City’s Housing Rehabilitation Program, to assist with ADA upgrades to existing units, such as wheelchair ramps, shower bars, and Universal Design features (Ongoing, 2024) 5. Develop incentives for affordable housing and market rate developments to set aside larger shares of units as disability accessible (Ongoing, 2024). 6. Using poverty rates for the disabled population, designate a goal and plan for the development and maintenance of low-income disability-accessible housing sufficient to meet the needs of Gastonia’s poverty-level disabled population (Ongoing, 2024). 	
A strict and potentially discriminatory zoning code	<ul style="list-style-type: none"> • Expand the definition of “family” within the zoning code to account for foster or guardianship relationships, which may disproportionately impact disabled individuals (2024). • Establish a standardized administration process for reasonable accommodations for disabled residents (2024). • Amend the zoning code to remove the exclusion of people with substance abuse issues from the handicapped designation, and/or include ordinances specifically allowing treatment facilities for those suffering from alcohol or substance abuse issues (2024). 	<ul style="list-style-type: none"> • City of Gastonia

IMPEDIMENT #4: Limited Incomes and Lack of Access to Resources Restrict Housing Choice Among Protected Classes

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
<p>Continued need for neighborhood investment in areas with high poverty rates and low levels of access to resources and services.</p>	<ul style="list-style-type: none"> Partner with developers and community-based organizations to support investments in needed retail and services, such as fresh food retailers, in low- and moderate-income census tracts. Consider using the Community Land Trust model to support neighborhood retail and services along with the development of permanently affordable housing (Ongoing, 2024). Increase transportation access in areas of the county with higher housing costs and transportation burdens, such as South Gastonia (Ongoing, 2024). Continue to use CDBG, bond referendum, or other funding to collaborate on projects that develop, expand, or improve community spaces and programming, increase access to fresh food retailers, address blight, and support development of needed retail and services in low- and moderate-income census tracts, and particularly in R/ECAP census tracts, to address needs and opportunities identified in the Gastonia 2025 Comprehensive Plan and other local plans. Partner with community organizations and residents to further understand neighborhood funding needs and opportunities (Ongoing, 2024). Investigate whether the Biden administration’s Community Revitalization Fund has the potential to provide additional financial resources to support investments in Gastonia’s R/ECAPs and, if so, encourage and assist local Community Development Corporations in the application process (Ongoing, 2024.) Partner with Gaston County Schools, community stakeholders, and others to provide facilities, resources, and services to students attending lower-performing schools. These may include basic school resources and supplies, school readiness, mentoring and tutoring, family engagement and literacy, health services, behavioral and social supports, enrichment programs, programs to increase food security and access, support for ESL students and students with disabilities, resources for students experiencing homelessness, and other resources and services (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia Gaston County Gaston County Schools

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
	<ul style="list-style-type: none"> Collaborate with City and County leadership in investigating additional potential funding sources to support investments in public infrastructure, improvements, facilities, and services in low- and moderate-income census tracts (Ongoing, 2024). Use tools to limit gentrification impacts of investments in RECAPs, such as using a Community Land Trust to prioritize securing land for development of permanently affordable housing (Ongoing, 2024). 	
<p>High unemployment rates and low labor market engagement in R/ECAPs and low- and moderate-income neighborhoods</p>	<ul style="list-style-type: none"> Continue to collaborate with key stakeholders in implementing workforce and economic development strategies contained in the Gastonia 2025 Comprehensive Plan, including working with local educational facilities to expand current workforce development efforts to accommodate those who are unemployed and underemployed (Ongoing, 2024). Implement expanded public transportation options, such as rideshare or small buses/vans with extended hours, to address the transportation system’s limitations in routes and hours of operation (Ongoing, 2024). Collaborate with community development organizations on efforts to bring new development to high-poverty neighborhoods to create jobs and provide needed resources and services, such as grocery stores (Ongoing, 2024). Continue to utilize Opportunity Zones to attract developers who want to invest long-term in the local economy and community (Ongoing, 2024) Keep track of developments in the Purpose-Built Communities program and consider opportunities to partner with community stakeholders to join the network or implement a similar model to support investments in cradle to college education and community wellness along with investments in mixed-income housing. Consider meeting with key stakeholders in other North Carolina cities that have implemented this model to share information (Ongoing, 2024). Explore ways to partner with and fund community organizations that have implemented workforce development and employment programs in areas of the city 	<ul style="list-style-type: none"> City of Gastonia Gaston County Community partners

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
	<p>and county with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment (Ongoing, 2024).</p> <ul style="list-style-type: none"> • Continue to build relationships with employers and workforce development programs to provide workforce development opportunities and career pathways. Marketing for workforce development programs should be targeted to areas of the city and county with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment (Ongoing, 2024). • Collaborate with residents to understand barriers to accessing workforce development, employment, and education programs, and develop strategies to address these barriers (Ongoing, 2024). • Develop affordable housing in high-opportunity neighborhoods with access to jobs and public transportation (Ongoing, 2024). • Include residents, business owners, industry representatives, and representatives from neighborhood groups in planning processes for workforce development programs (Ongoing, 2024). 	

IMPEDIMENT #5: Lack of Resources and Coordination for Fair Housing Outreach, Education, and Enforcement Activities Limits Residents' Access to Fair Housing Services

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
<p>Stakeholder input and survey responses indicate that more fair housing education is needed for the general public and housing industry professionals.</p>	<ul style="list-style-type: none"> As detailed in the Affordable Housing Plan, develop a Housing Resource Center to be a one-stop-shop for housing-related resources such as housing counseling, housing referrals, rental assistance, resource navigation, homeless services, eviction diversion, legal assistance, landlord-tenant mediation, healthy homes programs, and others (Ongoing, 2024). Design and coordinate delivery of a fair housing education program that reaches members of the public who are most vulnerable for housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities. In addition to providing fair housing education through the Housing Resource Center, focus efforts on incorporating education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups. (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia Gaston County
<p>Lack of Spanish language materials and services makes fair housing resources unavailable to residents with limited English proficiency.</p>	<ul style="list-style-type: none"> Raise awareness of the City of Gastonia Fair Housing Officer and Fair Housing Hotline by continuing to distribute posters, brochures, and other materials. Provide material in English and Spanish, with translation to other languages as needed. (Ongoing, 2024). 	<ul style="list-style-type: none"> City of Gastonia Gaston County Gastonia Housing Authority
<p>Some landlords take advantage of renters with limited housing options through</p>	<ul style="list-style-type: none"> As part of the City’s fair housing education program, develop a curriculum that helps prospective renters recognize discriminatory leasing practices and unfair or illegal lease terms (Ongoing, 2024). Offer a seminar focused on “Landlord Rights and Responsibilities” targeted to private landlords with units in Gastonia and Gaston County to review fair housing laws and 	<ul style="list-style-type: none"> City of Gastonia Gaston County Gastonia Housing Authority

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
discriminatory leasing practices, unfair or illegal leases, or threatening illegal evictions.	<p>best practices regarding tenant selection, accommodations for people with disabilities, lease terms, and other key topics (Ongoing, 2024).</p> <ul style="list-style-type: none"> • Design and coordinate a fair housing testing program targeted toward identifying discrimination in the rental market in Gastonia and/or Gaston County (Ongoing, 2024). 	<ul style="list-style-type: none"> • Housing Providers in Gastonia and Gaston County