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MEMORANDUM

To: Town Council, Town of Hertford

CC: Doris Walton, Town Manager
Gina Durante, Town Clerk

From: Jake Siegel, FAM Project Consultant I

Date: 04/14/2025

Project: CDBG-Infrastructure Wastewater Treatment Plant (WWTP) Rehabilitation Project
CDBG # 18-I-3090 & 23-I-4156; WR No. 24-1145-A

Subject: **CDBG Fair Housing Analysis**

The purpose of this memo is to summarize the **Analysis of Impediments to Fair Housing Choice (AI) / Assessment of Fair Housing (AFH)** report required by the Town of Hertford for participation in the CDBG Infrastructure program. The Town is eligible to participate in the following NC Small Cities Community Development Block Grant (CDBG) Programs funded by the U.S. Department of Housing and Urban Development (HUD):

CDBG Program	State Administrating Agency
Infrastructure (CDBG-I)	NC Department of Environmental Quality (DEQ) Division of Water Infrastructure (DWI)
Economic Development (CDBG-ED)	NC Department of Commerce (DOC)
Neighborhood Revitalization (CDBG-NR)	Rural Economic Development Division (REDD)

BASICS OF FAIR HOUSING LAW

As a recipient of federal funds, the Town must demonstrate efforts to *affirmatively further fair housing (AFFH)*. The federal Fair Housing Act of 1968 prohibits the denial of housing to a person based on the person's membership in one or more of the protected classes. It is also illegal to coerce, intimidate, threaten, or interfere with a person seeking to exercise rights under the Fair Housing Act. Protected classes are:

- Race
- Color
- Religion
- National origin
- Sex
- Familial status
- Disability or handicap

It is illegal to discriminate against a person in a protected class in the following housing situations:

- The advertising, terms, conditions, privileges, financing, or providing services or facilities in connection with the sale or rental of most housing;
- Providing reasonable modification to a dwelling for persons with a disability at their expense when necessary for the full use and enjoyment of the dwelling;
- The provision of reasonable accommodations to the rules, policies, practices or services when necessary to provide persons with a disability the equal opportunity to use and enjoy the dwelling;

Examples of Prohibited Actions:

- Discriminatory advertising, terms, conditions, privileges, financing, or provision of services or facilities in connection with the sale or rental of most housing



- False denial of availability
- Refusal to deal & financial discrimination
- Indicating any preference or limitation because of class membership
- Denying anyone the use of or participation in any real estate services
- Denial or certain reasonable modifications and/or reasonable accommodations

COMPLAINT PROCEDURE

Any person or persons wishing to file a complaint of housing discrimination in the Town may do so by informing the Town Manager. Town of Hertford: PO Box 32, 114 West Grubb Street, Hertford, NC 27944; PH: 252-426-5311; TDD: 800-735-2962 (711) of the facts and circumstance of the alleged discriminatory acts or practice. Upon receiving a housing discrimination complaint, the Town shall acknowledge the complaint within 10 days in writing and inform the North Carolina Department of Environmental Quality (NC DEQ) – Division of Water Infrastructure (DWI), and the North Carolina Human Relations Commission (NCHRC) about the complaint. The Town shall offer assistance to NCHRC in the investigation and reconciliation of all housing discrimination complaints based on events occurring in the Town. For more information: HUD Office of Fair Housing and Equal Opportunity (FHEO) at 800-440-8091, the NCHRC at 919-807-4424, or Legal Aid of NC 855-797-FAIR (3247) for individual assistance.

ANALYSIS OF IMPEDIMENTS (AI) / ASSESSMENT OF FAIR HOUSING (AFH)

In February 2025, Town Council approved and adopted the CDBG Program Manual for the Town's new CDBG-I grant, which includes a *Fair Housing Plan (FHP)* and quarterly activities. The next step is for the Town to conduct an *Assessment of Fair Housing (AFH)* to cover a 5-year period. The AFH process includes:

- A. Analysis of demographic, housing and economic statistics illustrating trends over time since 2010, comparing the Town, Perquimans County, and NC;
- B. Identification any fair housing issues & impediments to the community;
- C. Identification of SMART Goals (**S**pecific, **M**easurable, **A**ction-Oriented, **R**ealistic, and **T**ime-Bound) that can be attempted to be addressed within the timeframe of the CDBG grant; and
- D. Activities to meet these goals, including community participation.

Analysis of Census Data 2010-2022

In general, the Town trends are similar to that of Perquimans County and the state, with a few highlights-

- Compared to the County and State, Hertford has a higher percentage of Black/African American persons and lower percentage of persons of Hispanic or Latino origin
- Hertford's foreign-born population is approx. 4.5 times less than that of the State, and Hertford's population that speaks a language other than English at home is 3 times less than that of the State
- Even though the Town experienced a decrease in the elderly population between ACS periods, Hertford has double the percentage of elderly persons living alone compared to the County and State
- The percentage of grandparents responsible for their grandchildren more than tripled in Hertford (from 16.1% to 55.9%); while Perquimans County saw a 10% increase and the State experienced a decrease.
- The Town's elderly and disabled population increased approx. 12% percent population, while the County saw a slight increase and the State saw a slight decrease.
- The single mother household in Hertford is nearly double the percent than the County and State
- While the Town's median household income achieved the most growth (+73%) compared to the County (+38%) and State (+45%), the local poverty rate for families and individuals is still 5% to 10% higher than both the County and State
- Compared to the County and State, Hertford experienced the largest increase in rental vacancy rate between 2010 and 2022 (+12%), but also the largest decrease in homeowner vacancy rate (from 8.1% to 0%)





- Compared to the County and State, Hertford has the oldest housing stock, with only 31% of homes being constructed since 1990, and the majority of the older homes constructed pre-1950.
- Median home value increased by 57% in the State and 37% in the County, but only 16% in the Town
- Compared to the County and State, Hertford has a slightly higher percentage of renter-occupied units – around 40% of occupied housing units in Hertford are rented
- Black/African American persons in Hertford experienced a significant decrease in renting housing units (-20%), while White persons experienced a 20% increase in renting housing units. This trend is consistent with that of the County, but opposite of trends in the State.
- Individuals of Hispanic or Latino Origin in Hertford experienced increases in homeownership, consistent with the County and State.
- According to HUD, households that pay more than 30% of monthly income on housing costs are cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and healthcare.
 - Approx. 21.3% of homeowners in Hertford are cost burdened (consistent with the County and State)
 - Approx. 38% of renters in Hertford are cost burdened (approx. 10% less than the County and State)
 - Affordability of rental units got better in both the Town and County, but stayed the same for the State between census periods.
- According to the Hertford Public Housing Authority, the waitlist for public housing is approx. 5-7 years for a single bedroom unit and 2-3 years for 2-4 bedroom unit.

☐ Impediments to Fair Housing

The barriers identified are common themes across NC communities and can be summarized as difficulties with affordable housing and generally include:

1. A lack of affordable housing stock in a range of sizes
2. A lack of affordable rental units in a range of sizes
3. A lack of public interest in communication about fair housing

While these are impediments are listed, when compared to the county and state, Hertford has improved housing affordability and increased variety of housing stock in the last decade. Additional Town factors to consider are the multi-year waiting list for public housing and need for larger housing units. Hertford has no known issues related to housing discrimination and has not received any community complaints.

☐ SMART Goals & FH Priorities

Based on the fair housing impediments, the identified goals are:

1. Continue to expand community outreach methods for fair housing education & enforcement efforts
2. Continue to have public meetings regarding fair housing
3. Continue to research and seek funding opportunities for community & economic development

☐ Activities

Based on the identified goals, the Town should continue to:

- Continue working with housing partners such as the Hertford Housing Authority
- Conduct fair housing activities to inform residents of their rights and housing providers of their responsibilities
- Enhance community outreach & collaborate with partners for housing, economic development, infrastructure, and overall community development
- For the CDBG program, combine Fair Housing and Section 3 public notices (English & Spanish) where feasible, expand distribution to online and social media outlets & local events





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Our People Your Success.

The Resolution to Adopt the 2025 Analysis of Impediments/Assessment of Fair Housing includes the Town's commitment to affirmatively further fair housing. The report is presented to the Council for approval and adoption to satisfy the conditions of the CDBG-I project.

C: CDBG-I Files, 18-I-3090 & 23-I-4156



TOWN OF HERTFORD

**FY 18/23 COMMUNITY DEVELOPMENT BLOCK GRANT INFRASTRUCTURE PROGRAM
AND CWSRF PROGRAM
WASTEWATER TREATMENT PLANT REHABILITATION INFRASTRUCTURE PROJECT
(18-I-3090 & 23-I-4156)**

ASSESSMENT OF FAIR HOUSING RESOLUTION

A Resolution Authorizing the Analysis of Impediments to Fair Housing Choice (Assessment of Fair Housing) for the TOWN OF HERTFORD during the North Carolina Small Cities Community Development Block Grant- Infrastructure (CDBG-I) Program.

WHEREAS, the TOWN participates in the Small Cities CDBG Program under the Housing and Community Development Act of 1974, as amended, and administered by the North Carolina Department of Environmental Quality (DEQ), Division of Water Infrastructure (DWI);

WHEREAS, the TOWN certifies to the Division that it will affirmatively further fair housing; and

WHEREAS, the Assessment of Fair Housing is required under this program;

WHEREAS, the Assessment of Fair Housing is generally equivalent to the Analysis of Impediments to Fair Housing; and

THEREFORE, BE IT RESOLVED by the TOWN COUNCIL of the TOWN OF HERTFORD, North Carolina:

That this Assessment of Fair Housing is hereby adopted and to be used throughout the implementation of the TOWN OF HERTFORD CDBG PROGRAM

Adopted this day of April, 2025.

✓

R. Ashley Hodges, Mayor

ATTEST:

✓

Gina Durante, Town Clerk



Town of Hertford
NORTH CAROLINA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
(ASSESSMENT OF FAIR HOUSING)

2025

TABLE OF CONTENTS

1.0	Executive Summary	3
2.0	Summary of Fair Housing Issues & Capacity	4
	Background and Purpose	4
	North Carolina Analysis of Impediments	5
3.0	Analysis of Data	7
	Race, Color, & National Origin	7
	Age, Sex, & Disability	10
	Familial Status	12
	Economic Characteristics	13
	Housing Characteristics	14
	Community Facilities & Environmental Justice	18
4.0	Assessment of Fair Housing Data	25
	Existing Programs and Activities	25
	Barriers to Equal Housing Opportunities	31
5.0	Identification of Fair Housing Priorities & Goals	32
6.0	Community Participation	33
	Public Hearings & Program Set-Up	33
	Hurricane Recovery Outreach	Error! Bookmark not defined.
	Fair Housing Complaint Procedure	33
	Aligning SMART Goals & Civil Rights Outreach	34
7.0	Certification	36

1.0 EXECUTIVE SUMMARY

The Town of Hertford, North Carolina has been the recipient of several Community Development Block Grants (CDBG) in the past. With each new grant approved, a new Fair Housing Plan was adopted. Over the years, the Town has demonstrated continued efforts to affirmatively further fair housing. The Town has not received notification of any fair housing complaints from the North Carolina Human Relations Commission (NCHRC) within the NC Department of Administrative Hearings, Civil Rights Division¹.

The Town is eligible to participate in multiple Small Cities CDBG Programs under the Housing and Community Development Act of 1974, as amended. Should the City desire to seek CDBG funds from both funding agencies, this document is intended to be sufficient for both.

CDBG Program	State Administrating Agency
Infrastructure (CDBG-I)	NC Department of Environmental Quality (DEQ) Division of Water Infrastructure (DWI)
Economic Development (CDBG-ED)	NC Department of Commerce (DOC)
Neighborhood Revitalization (CDBG-NR)	Rural Economic Development Division (REDD)

¹ NC Office of Administrative Hearings. *Civil Rights Division*. <http://www.ncoah.com/civil/>



BACKGROUND AND PURPOSE

According to the Title VIII of the Civil Rights Act of 1968 (Fair Housing Act²), the Federal Fair Housing Amendments Act of 1988, and the North Carolina State Fair Housing Act, G. S. Chapter 41A, it is unlawful for any persons in a real estate transaction to conduct discriminatory housing practices based upon race, color, sex, religion, national origin, handicapped condition (or disability), or familial status. In addition, the North Carolina Fair Housing Act was amended in 2009³ to add affordable housing as a protected class for land-use decisions, such that "land-use planning and regulation cannot refuse approval or otherwise discriminate against proposals because they include affordable housing"⁴.

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

Fair housing choice is not only about combating discrimination. Fair housing choice involves individuals and families having the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability, and that their choices realistically include housing options in integrated areas and areas with access to opportunity. Fair housing choice encompasses (1) actual choice, which means the existence of realistic housing options; (2) protected choice, which means housing that can be accessed without discrimination; and (3) enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs.

The United States Department of Housing and Urban Development (HUD) is committed to eliminating racial and ethnic segregation and other discriminatory practices in housing and will use all of their programmatic and enforcement tools to achieve this goal. Recipients of Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME) and/or Emergency Solutions Grants (ESG) funding are required to certify that they will *affirmatively further fair housing* (AFFH) as part of grant obligations. In 2015, HUD published a final rule to clarify requirements to affirmatively further fair housing, including the update of the *Analysis of Impediments to Fair Housing Choice* (AI) to an *Assessment of Fair Housing* (AFH)^{5,6}. In 2021, HUD issued a new rule⁷ to restore AFFH definitions and certifications, essentially allowing entities to proceed with conducting an AI or AFH. The fundamental goal of HUD's fair housing policy is to make housing choice a reality through Fair Housing planning, involving three main elements⁸:

² 42 U.S.C. 3601-20. <http://www.gpo.gov/fdsys/pkg/USCODE-2009-title42/html/USCODE-2009-title42-chap45-subchapl.htm>

³ NC General Assembly. NCGS. Chapter 41A-4. <http://www.ncga.state.nc.us/gascripts/statutes/StatutesTOC.pl?Chapter=0041A>

⁴ Fair Housing Project of Legal Aid North Carolina. Training Presentation. "Fair Housing, Zoning, and Affirmatively Furthering Fair Housing: What is Required?" Accessed from NC Human Relations Commission at <http://ncadmin.nc.gov/citizens/fair-housing/fair-housing-resources>

⁵ North Carolina Department of Environmental Quality (NC DEQ). Division of Water Infrastructure (DWI). *CDBG-I Compliance & Reporting Information*. <https://deq.nc.gov/about/divisions/water-infrastructure/i-have-funding/cdbg-i-compliance-and-reporting-information>

⁶ 24 CFR 5.150-168 *Affirmatively Furthering Fair Housing* <http://www.ecfr.gov/cgi-bin/text-idc?rgn=div5&node=24:1.1.1.1.5>

⁷ 86 Federal Register 30779. *Restoring AFFH Definitions and Certifications*. (Vol. 86, No. 110. Pub 6/10/21. Eff 07/31/21.)

<https://www.federalregister.gov/documents/2021/06/10/2021-12114/restoring-affirmatively-furthering-fair-housing-definitions-and-certifications>

<https://www.govinfo.gov/content/pkg/FR-2021-06-10/pdf/2021-12114.pdf>

⁸ 24 CFR 570 <http://www.gpo.gov/fdsys/pkg/CFR-2003-title24-vol3/xml/CFR-2003-title24-vol3-part570.xml#seqnum570.487>

1. Conducting an analysis to identify impediments to fair housing choice (AI) within the jurisdiction;
2. Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
3. Maintaining records reflecting the analysis and actions taken.

NORTH CAROLINA ANALYSIS OF IMPEDIMENTS

Specifically, impediments to fair housing choice are 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**.

In 2021, North Carolina's AI submitted with the Consolidated Plan⁹ identified statewide impediments for consideration of local governments:

1. *Discrimination in the rental housing market* persists with disability and race as the two most often cited alleged bases of discrimination.
2. *A lack of awareness and knowledge of fair housing laws in rural areas* among both consumers and providers restricts housing choice where enforcement resources are the most limited but where housing is more affordable.
3. *An inadequate supply of rental housing that is affordable, as well as accessible to persons with disabilities*, severely limits housing choice.
4. *Homeownership among Black households and Hispanic households is less than 50%*, respectively.
5. *Turnover among public officials in subrecipient small towns* makes it imperative to maintain the education efforts regarding affirmatively furthering fair housing.
6. *There are over 30 language groups in the state* that meet or exceed the safe harbor threshold for translation of vital documents as required by Title VI of the Civil Rights Act of 1964.

The AFH process is a community-based process that uses data to identify and address housing issues. The AFH process involves a community-based assessment of housing and related conditions, using the information to identify and address housing issues. The AFH process is a community-based process that uses data to identify and address housing issues. The AFH process involves a community-based assessment of housing and related conditions, using the information to identify and address housing issues.

The AFH document prepared using census data and community data to assist the community to take action to overcome the effects of discrimination. The AFH process encourages community participation. The format used to conduct this assessment is a combination of the outline recommended in HUD's *Fair Housing Planning Guide*¹⁰ and guidance from funding agencies.

⁹NC Department of Commerce (NC DOC), Rural Economic Development Division. *Grants Management Documents*. "North Carolina Analysis of Impediments to Fair Housing Choice 2021-2025". <https://www.commerce.nc.gov/grants-incentives/grant-management-documents>.

¹⁰ U.S. HUD, FHED. (March 1996). *Fair Housing Planning Guide*. HUD-1582B-FHEO. <http://www.hud.gov/offices/theo/images/fhpg.pdf>

3.0 ANALYSIS OF DATA

The Town of Hertford is committed to the goal that every citizen be offered an opportunity to select the home of his or her choice. As required by regulations set forth by HUD, recipients of NC CDBG must submit an Analysis of Impediments to Fair Housing Choice Study (AI) / Assessment of Fair Housing (AFH) every five years. The **2018-2022 American Community Survey (ACS) 5-year estimates**, along with the accompanying data from the North Carolina Office of State Budget and Management (NC OSBM) and 2010 U.S. Census, are the best available data to retrieve information for this analysis.

RACE, COLOR, & NATIONAL ORIGIN

As depicted in **Table 1** below, according to the 2006-2010 American Community Survey (ACS) 5-year estimates¹¹, and 2018-2022 ACS data¹², the Hispanic white population remained constant in the Town, with no increase from the 2010 levels of 0.00%. Perquimans County and the Town both experienced surges in the Hispanic “some other race alone” population, with increases of ≈11% and ≈24% respectively. This runs counter to the State’s trends between 2010 and 2022, which experienced a ≈10% decrease in that population. Compared to the State, the County and the Town have lower percentages of Hispanic or Latino populations, although both experienced minor increases between 2010 and 2022. As illustrated in the U.S. EPA NEPAAssist data¹³ (**Figure 1 and Figure 2**), minority and Hispanic populations have higher concentrations in the central and northwestern portions of the Town.

Table 1: Comparison of Race and National Origin by State, County, and Town, 2010-2022

Race	NC		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
Total	9,271,178	10,470,214	13,091	13,053	1,848	2,045
Not Hispanic or Latino	92.20%	89.96%	98.30%	96.82%	98.54%	96.87%
White alone	71.70%	68.54%	72.69%	72.87%	49.20%	48.41%
Black or African American alone	22.95%	22.95%	27.26%	23.56%	50.80%	50.48%
American Indian & Alaska Native alone	1.18%	0.97%	0.00%	0.01%	0.00%	0.00%
Asian alone	2.26%	3.43%	0.00%	0.44%	0.00%	0.05%
Native Hawaiian & Other Pacific Islander alone	0.05%	0.06%	0.00%	0.02%	0.00%	0.00%
Some other race alone	0.21%	0.41%	0.00%	0.02%	0.00%	0.00%
Two or more races	1.65%	3.63%	0.05%	3.09%	0.00%	1.06%
Hispanic or Latino	7.80%	10.4%	1.70%	3.18%	1.46%	3.13%
White alone	44.88%	32.78%	43.24%	39.04%	0.00%	0.00%
Black or African American alone	2.71%	2.91%	3.15%	0.00%	0.00%	0.00%
American Indian & Alaska Native alone	0.68%	1.71%	0.00%	2.17%	0.00%	0.00%
Asian alone	0.30%	0.26%	0.00%	0.00%	0.00%	0.00%
Native Hawaiian & Other Pacific Islander alone	0.08%	0.08%	0.00%	0.00%	0.00%	0.00%
Some other race alone	46.80%	36.45%	39.19%	50.36%	62.96%	87.50%

¹¹ United States Census Bureau (U.S. Census). 2006-2010 American Community Survey (ACS). *Table DP-05: ACS Demographic and Housing Estimates*. Data Profiles. <https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/#:~:text=Data%20Profiles%20have%20the%20most,basic%20data%20on%20all%20topics>.

¹² U.S. Census. 2018-2022 ACS. *Table DP-05: ACS Demographic and Housing Estimates*.

¹³ United States Environmental Protection Agency (U.S. EPA) National Environmental Policy Act Tool (NEPAAssist). <https://www.epa.gov/nepa/nepassist>

¹⁴ U.S. Census. 2006-2010 ACS. *Table B03002: Hispanic or Latino Origin by Race*.

¹⁵ U.S. Census. 2018-2022 ACS. *Table B03002: Hispanic or Latino Origin by Race*.

Two or more races

4.55%

25.81%

4.50%

8.43%

37.04%

12.50%

Figure 1a. 2010 Census People of Color Population

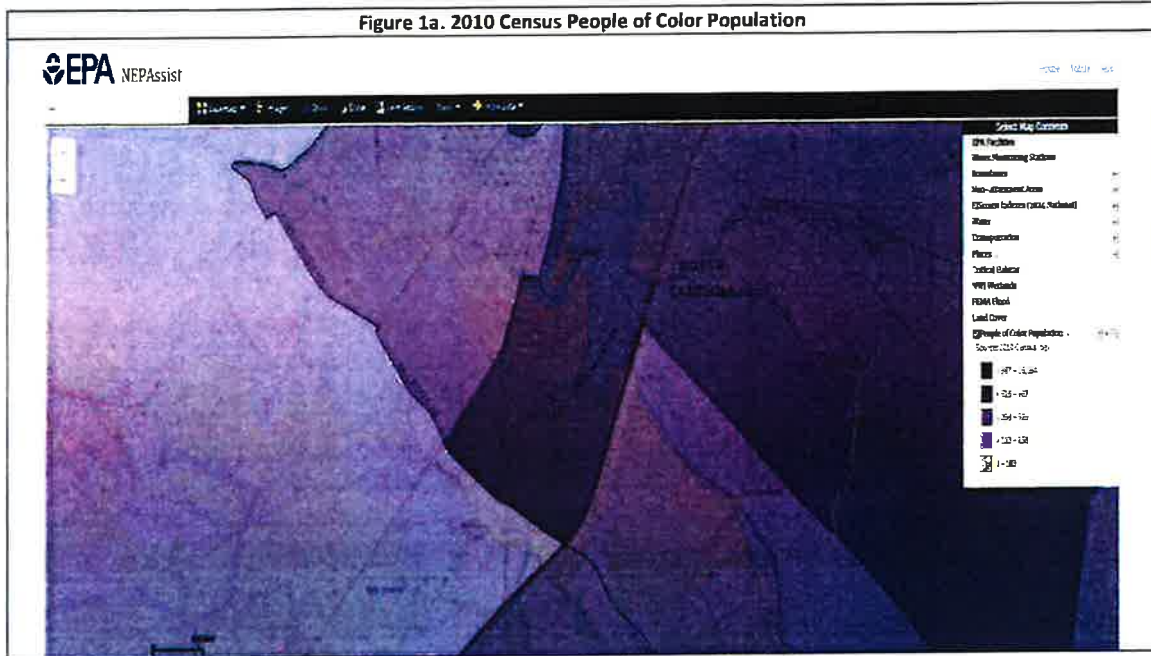


Figure 1b. 2018-2022 ACS People of Color Population



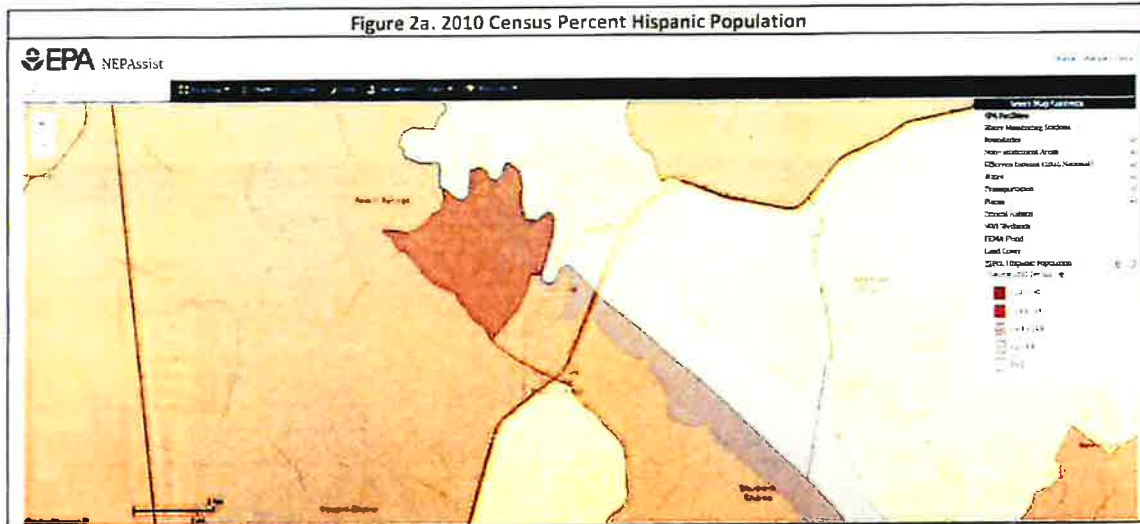


Figure 2b. 2018-2022 ACS Percent Hispanic Population

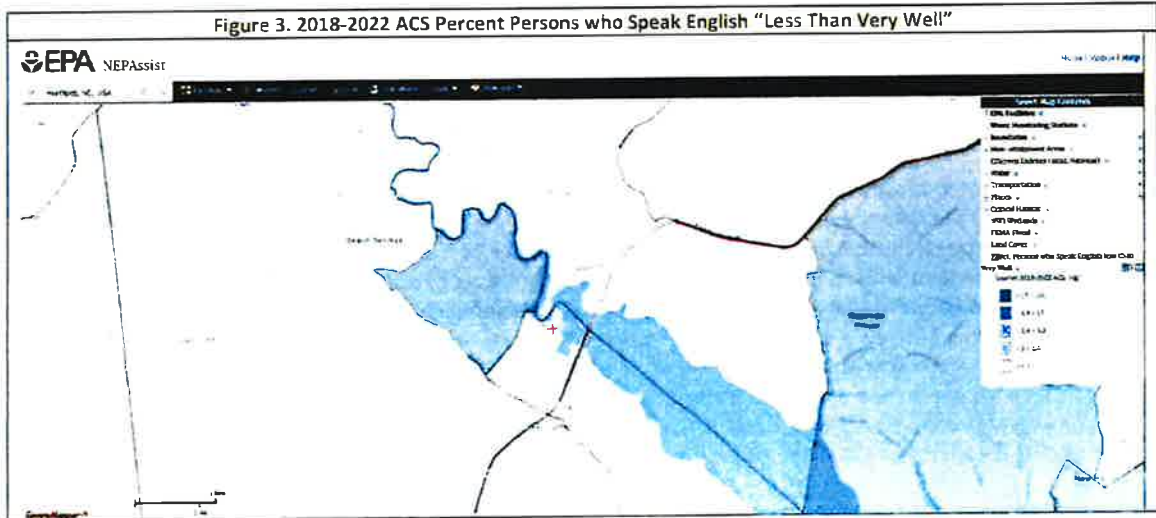


As illustrated in **Table 2**, 0.70% of Hertford’s population is foreign born, essentially 4.5 times less than that of the State for the ACS 2010 period and 12 times less than the State for the ACS 2022 period. The Town and County have a much lower ratio of Hispanic persons compared to the State, and therefore less Spanish is spoken at home. In Hertford, of the population age 5 and older, approximately 4% speaks a language other than English at home (consistent with that of the County level, but 3 times less than the State level). The majority of that population speaks Spanish at home, although approximately 0.0% speaks English “less than very well”. The population that speaks English “less than very well” decreased in the Town between 2010 and 2022, whereas in the State, the percent stayed relatively constant between the ACS survey periods. The Town provides public notices in English and Spanish, with availability upon request to provide translation and interpretation. As illustrated in the U.S. EPA

NEPAssist data¹⁶ (Figure 3), percent of the population with limited English proficiency is concentrated in the same areas as minority and Hispanic populations.

TABLE 2. Population Speaking English "Less Than Very Well" in Hertford from 2010 to 2022

Description	North Carolina		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
Population foreign-born	7.40%	8.30%	0.90%	2.30%	1.60%	0.70%
<i>Language Spoken at Home</i>						
Population age 5 and older	8,649,307	9,880,447	12,444	12,498	1,725	1,866
English only	89.6%	87.7%	97.8%	96.0%	96.8%	95.9%
Language other than English	10.4%	12.3%	2.2%	4.0%	3.2%	4.1%
Speak English "less than very well"	4.9%	4.6%	0.3%	0.4%	1.5%	0.5%
Spanish	6.9%	7.8%	1.3%	2.5%	2.1%	3.5%
Speak English "less than very well"	3.8%	3.2%	0.3%	0.0%	1.5%	0.0%
Other Indo-European languages	1.6%	2.0%	0.9%	0.5%	1.1%	0.0%
Speak English "less than very well"	0.4%	0.5%	0.0%	0.1%	0.0%	0.0%
Asian and Pacific Islander languages	1.4%	1.8%	0.0%	0.4%	0.0%	0.0%
Speak English "less than very well"	0.6%	0.7%	0.0%	0.3%	0.0%	0.0%
Other languages	0.4%	0.6%	0.0%	0.6%	0.0%	0.6%
Speak English "less than very well"	0.1%	0.2%	0.0%	0.1%	0.0%	0.5%



¹⁶ United States Environmental Protection Agency (U.S. EPA) National Environmental Policy Act Tool (NEPAssist).

<https://www.epa.gov/nepa/nepassist>

¹⁷ U.S. Census, 2006-2010 ACS, Table DP-02: Selected Social Characteristics.

¹⁸ U.S. Census, 2018-2022 ACS, Table DP-02: Selected Social Characteristics.

AGE, SEX, & DISABILITY

As depicted below in **Table 3**, according to the ACS data, the median age is generally in the mid- to late-30s for the State, but mid- to late-40s for Perquimans County and the Town of Hertford. Compared to the State, the County and Town have higher percentages of elderly individuals, although the Town experienced a ≈7% decrease in that population and the County experienced a ≈7% increase between 2010 and 2022^{19,20}. Also, compared to the State and County, Hertford has approximately double the percentage of elderly persons living alone^{21,22}. Additionally, the percentage of grandparents responsible as primary caregivers for their minor grandchildren has drastically increased in the Town (≈44%), moderately increased in the County (≈9%), but decreased in the State. The gender breakdown for the State and County is generally split, with a slightly higher percentage of females than males. However, Hertford has approximately 15% more females than males.

Table 3. Age, Sex, and Disability in North Carolina, Perquimans County, and the Town of Hertford

Description	North Carolina		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
Total Population	9,271,178	10,470,214	13,091	13,053	1,848	2,045
Male (%)	48.7%	49.0%	48.0%	47.8%	39.1%	42.3%
Female (%)	51.3%	51.0%	52.0%	52.2%	60.9%	57.7%
Median Age	37.1	39.1	46.3	49.8	45.3	43.0
18+ years and over (%)	75.9%	78.2%	79.7%	81.4%	73.6%	78.5%
65+ years and over (%)	12.6%	16.7%	21.3%	28.1%	27.4%	20.5%
65+ years householder living alone (% of HH)	9.0%	7.9%	10.2%	10.2%	20.7%	20.6%
Grandparents responsible for grandchildren (%)	50.6%	39.4%	56.5%	64.9%	16.1%	55.9%

As shown in **Table 4**, according to 2018-2022 ACS data, approximately 20% of the Town's population is disabled, similar to that of the County but ≈7% higher than the State. This constitutes a slight increase from 2010 levels. Across all jurisdictions, the age group with the highest percentage of individuals with disabilities is the elderly. In Hertford, the number of elderly individuals with a disability increased by ≈13% between 2012 and 2022. Modern medical advances have resulted in a stronger, longer-lived, disabled population and a growing number of elderly citizens. This group of citizens presents unique forces on the local housing market. Social Security and Medicare are unable to fully fund special services and products (including housing), which the elderly must have in order to maintain an adequate standard of living. Many localities have been pushed to help find ways to curb costs through assisting with affordable housing programs. Generally, elderly and disabled residents, along with families who have lost homes to disasters, are given first priority for housing assistance.

¹⁹ U.S. Census. 2006-2010 ACS. *Table DP-05: ACS Demographic and Housing Estimates.*

²⁰ U.S. Census. 2018-2022 ACS. *Table DP-05: ACS Demographic and Housing Estimates.*

²¹ U.S. Census. 2006-2010 ACS. *Table DP-05: ACS Demographic and Housing Estimates.*

²² U.S. Census. 2018-2022 ACS. *Table DP-05: ACS Demographic and Housing Estimates.*

²³ U.S. Census. 2006-2010 ACS. *Table DP-05: ACS Demographic and Housing Estimates.*

²⁴ U.S. Census. 2006-2010 ACS. *Table DP-02: Selected Social Characteristics.*

²⁵ U.S. Census. 2018-2022 ACS. *Table DP-05: ACS Demographic and Housing Estimates.*

²⁶ U.S. Census. 2018-2022 ACS. *Table DP-02: Selected Social Characteristics.*

Table 5.11: Disability by Age, 2012 and 2022 ACS, Year Estimates

Description	North Carolina		Perquimans County		Town of Hertford	
	2012	2022	2012	2022	2012	2022
Civilian noninstitutionalized population with a disability (%)	13.1	13.3	18.9	20.9	18.8	19.9
Population under 5 years with a disability (%)	0.8	0.7	0.0	0.0	0.0	0.0
Population 5 to 17 years with a disability (%)	5.7	5.8	3.5	9.1	5.4	1.1
Population 18 to 64 years with a disability (%)	11.4	11.03	18.9	18.47	16.5	17.1
Population 65 years and over with a disability (%)	38.4	33.62	34.8	34.9	36.4	48.9

²⁷ U.S. Census. 2008-2012 ACS. Table S1810: Disability Characteristics.

²⁸ U.S. Census. 2018-2022 ACS. Table S1810: Disability Characteristics.

FAMILIAL STATUS

Generally, as divorce rates rise, and single parents find themselves in the position of being more responsible for a larger portion or all of their family's needs, they are more apt to face financial hardships. Many single parent households live on the fringe of poverty just trying to meet basic living expenses. Many times, federal welfare is employed by this struggling group, but even these subsidies have left many households lacking essential funds. Also, current education and employment trends suggest that these living conditions are cyclic, with children of these families repeating the same living pattern.

According to the ACS data illustrated in **Table 5**, the average household size in the Town of Hertford has increased slightly between 2010 and 2022, but the County and State household size have both slightly decreased^{29,30}. In 2018-2022, approximately 11.3% of the Town's households are occupied by females, with no husband present and with children less than 18 years of age, compared to the ≈5.7% at the County and State. Conversely, of the total number of the Town's households, approximately 0% are occupied by males, with no wife present and with children less than 18 years of age, compared to the ≈1% at the County and State.

Table 5. Household Size, by Family Type, by County and State, 2010-2022

Description	North Carolina		Perquimans County		Hertford	
	2010	2022	2010	2022	2010	2022
Average household size	2.49	2.48	2.43	2.33	2.07	2.37
Married-couple family (%)	49.5%	47.6%	61.7%	52.2%	33.2%	29.9%
Male householder, no wife present, with own children under 18 years (%)	2.2%	1.2%	1.1%	1.0%	1.5%	0.0%
Female householder, no husband present, with own children under 18 years (%)	7.8%	5.6%	4.3%	5.8%	10.2%	11.3%

²⁹ U.S. Census. 2006-2010 ACS. *Table DP-02: Selected Social Characteristics.*

³⁰ U.S. Census. 2018-2022 ACS *Table DP-02: Selected Social Characteristics.*

³¹ U.S. Census. 2006-2010 ACS. *Table DP-02: Selected Social Characteristics.*

³² U.S. Census. 2018-2022 ACS *Table DP-02: Selected Social Characteristics.*

EDUCATIONAL AND ECONOMIC CHARACTERISTICS

As shown in **Table 6**, in the 2006-2010 survey period, the percentage of persons who did not complete high school was 16% for North Carolina, 15% in Perquimans County, and 14% in the Town of Hertford. By the 2018-2022 period, the percentage of persons who did not complete high school was about 11% for the State, 14% in the County, but 20% in the Town. Whereas the State and County experienced an increase in the percentage of individuals with a high school diploma or equivalent, the Town experienced a 6% decrease in that population. While the median household income in Hertford is lower compared to the State and County, it achieved the most growth between survey periods at 73%, compared to 45% growth at the State, and 38% growth at the County. Although, the growth in median household income in Hertford seems to have (in part) contributed to an 18% decrease in the local poverty rate, it (the poverty rate) remains 5% higher than the County and 8% higher than the State.

Table 6. Education & Economic Status by 2006-2010^{33,34} and 2018-2022^{35,36} ACS 5-Year Estimates

Description	North Carolina		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
High school graduate or higher (%)	83.6%	89.4%	85.3%	86.4%	86.3%	79.6%
Bachelor's degree or higher (%)	26.1%	33.9%	18.1%	19.6%	24.4%	10.6%
Poverty Rate for High school graduate or higher (%)	13.4%	14.9%	18.1%	18.1%	40.7%	22.7%
Poverty Rate for Bachelor's degree or higher (%)	3.4%	4.1%	2.0%	1.4%	5.2%	0.0%
Unemployment Rate for Population Age 16 years and over (%)	8.8%	5.1%	8.7%	5.0%	4.6%	13.3%
Median household income (\$)	45,570	66,186	43,041	59,401	25,250	43,696
Families with incomes in last 12 months below the poverty level (%)	11.4%	9.5%	13.4%	11.3%	19.5%	24.8%
People with incomes in last 12 months below the poverty level (%)	15.5%	13.3%	18.0%	13.3%	34.2%	21.7%

³³ U.S. Census. 2006-2010 ACS. Table S1501: Educational Attainment.

³⁴ U.S. Census. 2006-2010 ACS. Table DP-03: Selected Economic Characteristics.

³⁵ U.S. Census. 2018-2022 ACS. Table S1501: Educational Attainment.

³⁶ U.S. Census. 2018-2022 ACS. Table DP-03: Selected Economic Characteristics.

HOUSING CHARACTERISTICS

Housing need generally revolves around three factors – occupancy, physical quality, and affordability. All housing that does not meet the standards for these elements presents unique problems for those families and individuals who occupy or seek to occupy these dwellings.

Table 7 below illustrates that all three jurisdictions are experiencing a higher rental vacancy rate than homeowner vacancy rate. While the State experienced a drop in both rental and homeowner vacancy rates between the 2010 and 2022 ACS periods, the County experienced an increase in rental vacancy rates and a decrease in homeowner vacancy rates. Similar to the County's trends, Hertford experienced a complete reduction in homeowner vacancy rates (to 0.0%) and an increase in rental vacancy rates (from 0.0% to 12.0%)^{37,38}. Of the occupied housing units in the County, homeowners are close to being three times the amount of renters. The average household size for all units generally stayed constant at approximately between 2 and 3 persons.

Table 7. Housing Occupancy Status by 2006-2010³⁹ and 2018-2022⁴⁰ ACS 5-Year Estimates

Description	North Carolina		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
Total Housing Units	4,229,552	4,739,881	6,887	6,906	1,104	1,110
Occupied (%)	85.7	86.6	77.7	80.6	81.0	75.1
Vacant (%)	14.3	13.4	22.3	19.4	19.0	24.9
Homeowner vacancy rate (%)	2.5	1.4	4.0	.07	8.1	0.0
Rental vacancy rate (%)	9.6	6.9	0.7	3.2	0.0	12.0
<i>Units in Structure</i>						
1-unit, detached (%)	65.1	65.3	68.0	69.4	67.4	65.5
1-unit, attached (%)	3.6	4.5	0.0	0.2	0.0	1.3
2 units (%)	2.2	2.0	0.6	1.3	3.8	5.3
3+ units (%)	14.7	16.6	3.1	4.1	19.3	19.9
Mobile Home (%)	14.3	11.6	28.3	24.6	9.5	7.4
<i>Occupied Housing Units</i>						
Owner-Occupied (%)	68.1	66.2	77.2	76.6	61.0	61.4
Renter-Occupied (%)	31.9	33.8	22.8	23.4	39.0	38.6
Average household size of owner-occupied unit	2.54	2.56	2.45	2.28	2.06	2.32
Average household size of renter-occupied unit	2.38	2.32	2.34	2.48	2.07	2.44

As depicted in **Table 8**, in the State and Perquimans County, most homes were built between 1990 and 2010. Conversely, most homes in Hertford were constructed between (pre) 1939 and 1950. In 2022, the most prevalent value of owner-occupied housing units for the Town falls within the \$150,000 - \$199,999 range, within the \$200,000 - \$299,999 range for the County, and within the \$300,000 - \$499,999 range for the State^{41,42}. Home values increased in all jurisdictions from the 2010 ACS period to the 2022 ACS period. The ratio of owner-occupied units with a mortgage to those without mortgage generally remained similar for all jurisdictions from 2010-2022 and

³⁷ U.S. Census. 2006-2010 ACS. *Table DP-04: Selected Housing Characteristics.*

³⁸ U.S. Census. 2018-2022 ACS. *Table DP-04: Selected Housing Characteristics.*

³⁹ U.S. Census. 2006-2010 ACS. *Table DP-04: Selected Housing Characteristics.*

⁴⁰ U.S. Census. 2018-2022 ACS. *Table DP-04: Selected Housing Characteristics.*

⁴¹ U.S. Census. 2006-2010 ACS. *Table DP-04: Selected Housing Characteristics.*

⁴² U.S. Census. 2018-2022 ACS. *Table DP-04: Selected Housing Characteristics.*

cost the homeowners between \$500 and \$1,499 a month. These homes are generally heated with electricity, bottled tank or LP gas, utility gas, fuel oil or kerosene and some heated from wood or other sources. From 2010-2022 for the Town, County, and State, there was an increase in the percentage of occupied housing units with no telephone service available. Hertford experienced a slight increase (to 0.7%) in the percentage of occupied housing units lacking complete kitchen facilities between 2010 and 2022, whereas the State and County both experienced slight decreases. In 2022, the percentage of occupied housing units lacking complete plumbing facilities is $\geq 0.3\%$ for all jurisdictions.

As depicted in **Table 8**, when compared to the County and State, Hertford has the oldest housing stock, with most homes being constructed between (pre) 1939 and 1950, and 31% of homes being constructed since 1990. Homes in Hertford are approximately 50 years older than NC. From 2010 to 2022, median home values increased in NC and Perquimans County at 57% and 37%, respectively, but increased in Hertford by 16%.

Table 8. Housing Features by 2006-2010⁴³ and 2018-2022⁴⁴ ACS 5-Year Estimates

Description	North Carolina		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
Year Built (Most Prevalent Decades)	1980-2000	1990-2010	1980-2000	1990-2010	Pre-1950	Pre-1950
Homes Constructed Prior to 1990 (%)	60.9%	50.3%	69.6%	49.6%	80.2%	68.5%
Homes lacking complete plumbing or kitchen facilities (%)	1.1%	0.9%	0.4%	0.1%	0%	0.7%
Median Home Value (\$)	149,100	234,900	159,100	211,100	158,000	184,200

Census data does not determine the condition of a housing unit beyond its age, completeness of plumbing and kitchen facilities, type of heat, water source and type of sewage disposal. An older home will need more repairs and updating, and homes lacking complete plumbing or kitchen facilities may not be cost effective to rehabilitate.

⁴³ U.S. Census. 2006-2010 ACS. Table DP-04: Selected Housing Characteristics.

⁴⁴ U.S. Census. 2018-2022 ACS. Table DP-04: Selected Housing Characteristics.

As shown in **Table 9** below, from 2010 to 2022, White persons in Hertford experienced a 20% increase in renting housing units, while Black/African American persons experienced a 20% decrease in renting housing units. This trend is consistent with that of the County, but opposite of trends in the State. As shown in **Table 1**, the percentage of these populations in Hertford generally stayed the same between 2010 and 2022. Both Black/African American persons and White persons in Hertford experienced a slight decrease in homeownership between 2010 and 2022. Conversely, individuals of Hispanic or Latino Origin in Hertford experienced a 1.6% increase in homeownership between 2010 and 2022, which is consistent with increases in that population within the Town (as shown in **Table 1**). Individuals of Hispanic or Latino origin also experienced increases in homeownership at the County and State levels.

Table 9: Renter-Occupied Housing Units, 2010 and 2022, by Race, Sex, and Ethnicity

Town of Hertford	2010			2022		
Race (%)	Occupied Housing Units	Owner-Occupied	Renter-Occupied	Occupied Housing Units	Owner-Occupied	Renter-Occupied
White alone	51.7	72.5	19.2	59.0	71.3	39.4
Black/African American alone	46.4	27.5	75.9	37.1	25.0	56.2
Other Race(s) alone	1.9	0.0	4.9	1.7	0.0	4.3
Multi-Racial	0.0	0.0	0.0	2.3	3.7	0.0
Hispanic or Latino Origin	1.9	0.0	4.9	2.6	1.6	4.3
White alone, not Hispanic or Latino	51.7	72.5	19.2	59.0	71.3	39.4
Perquimans County	2010			2022		
Race (%)	Occupied Housing Units	Owner-Occupied	Renter-Occupied	Occupied Housing Units	Owner-Occupied	Renter-Occupied
White alone	72.7	82.3	40.2	75.4	77.9	67.5
Black/African American alone	27.0	17.7	58.4	20.6	17.9	29.4
Other Race(s) alone	0.3	0.0	1.4	1.0	0.7	1.8
Multi-Racial	0.0	0.0	0.0	3.0	3.5	1.3
Hispanic or Latino Origin	0.6	0.4	1.4	1.1	0.9	1.8
White alone, not Hispanic or Latino	72.4	81.9	40.2	75.0	77.3	67.5
NC	2010			2022		
Race (%)	Occupied Housing Units	Owner-Occupied	Renter-Occupied	Occupied Housing Units	Owner-Occupied	Renter-Occupied
White alone	73.0	80.2	57.8	68.8	76.5	53.6
Black/African American alone	20.7	15.2	32.5	21.1	14.7	33.5
Other Race(s) alone	5.1	3.8	8.1	6.4	5.5	7.9
Multi-Racial	1.1	0.8	1.6	3.8	3.2	5.1
Hispanic or Latino Origin	5.1	3.2	9.1	6.7	5.2	9.7
White alone, not Hispanic or Latino	70.7	78.5	54.0	66.5	74.7	50.4

⁴⁵ U.S. Census. 2006-2010 ACS. *Table S2502: Demographic Characteristics for Occupied Housing Units.*

⁴⁶ U.S. Census. 2018-2022 ACS. *Table S2502: Demographic Characteristics for Occupied Housing Units.*

According to HUD, households that pay more than 30% of monthly income on housing costs are cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and medical care⁴⁷. Housing costs include rent/mortgage, utilities, and maintenance-related fees. As illustrated below in **Table 10**, according to the 2006-2010 ACS, 43% of homeowners and 70% of renters in Hertford spent over 30% of household income for housing, which is roughly 4% lower than the County, but 20% higher than the State⁴⁸ for the same period. In the 2022 ACS period, this percentage decreased for homeowners across all jurisdictions (by half in Hertford). Additionally, the percentage of renters who spent 30% of household income on housing drastically decreased in the Town and County but remained relatively constant in the State. For Hertford, this indicates either improvement in the existence of more affordable housing, an increase in household incomes, or a combination of the two.

Table 10. Percent of Households with Housing Costs more than 30% of income 2006-2010⁴⁹ and 2018-2022⁵⁰ ACS 5-Year Estimates

Description	North Carolina		Perquimans County		Town of Hertford	
	2010	2022	2010	2022	2010	2022
Homeowner (%)	75.3	51.1	28.5	22.1	42.5	21.1
Renter (%)	43.3	17.2	70.1	49.1	59.5	18.1

⁴⁷ U.S. HUD. *Affordable Housing*. http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing

⁴⁸ U.S. Census. 2006-2010 ACS. *Table DP-04: Selected Housing Characteristics*.

⁴⁹ U.S. Census. 2006-2010 ACS. *Table DP-04: Selected Housing Characteristics*.

⁵⁰ U.S. Census. 2018-2022 ACS. *Table DP-04: Selected Housing Characteristics*.

COMMUNITY FACILITIES & ENVIRONMENTAL JUSTICE

The Town of Hertford is mostly mixed residential, with commercial corridors and industrial sectors, surrounded by low density residential/farmland⁵¹. The Town is managed through its own agencies and those of Perquimans County. These jurisdictions enforce their ordinances and strive to meet the priority goals outlined in the most recent *Town of Hertford Strategic Plan* (FY 2023-2024)⁵², with the following guiding themes:

- Maintain an attractive historic waterfront community for tourists and residents
- Improve and maintain existing public spaces and provide a community gathering space for tourists and residents
- Develop a finance plan to identify funding for current projects and guide Town finances into the future
- Maintain best practices for administrative operations
- Utilize technology, personnel evaluation systems, and merit pay to enable staff to excel and improve operating efficiencies
- Ensure a well-maintained Infrastructure and best practices utility operations
- Establish a level of service to be achieved through staffing, infrastructure repair, and use of technology
- Improve communications to guide visitors and keep citizens informed

The Town is approximately 20 miles from military based in Elizabeth City, 115 miles from military based in Havelock and approximately 16-20 miles to airports in Edenton (Chowan County) and Elizabeth City (Pasquotank County)^{53,54,55}. Major transportation corridors include the Chesapeake & Albermarle RR, U.S. Route 17, NC Highway 37, and US Highway 158^{56,57}. There are currently no major NC Department of Transportation (DOT) expansion projects (road, bike, pedestrian, or rail)^{58,59} in Hertford. The *2016 Perquimans County Comprehensive Transportation Plan* proposed improvements throughout the county, generally along major corridors. The jurisdictions operate water and sewer services and routinely seek funding assistance to upgrade systems to maintain environmental and public health standards⁶⁰. Every effort is made to provide all services on an equitable basis to all citizens throughout the area.

The Town of Hertford is the central provider within the Town for community services (police, fire, emergency, parks & recreation). The closest hospitals outside of Hertford are located approx. 16 minutes away in Edenton and 26 minutes away in Elizabeth City. The Town does not have national or state parks or monuments^{61,62}, but does have several municipal and county park/facility/recreation areas, including local monuments and memorials⁶³. According to NC State Historic Preservation Office (SHPO) (See **Figure 4**), the Town does have properties listed on the National Register of Historic Places, such as the Hertford Historic District that contains many historic homes, churches, and commercial sites^{64,65}.

⁵¹ Town of Hertford. Zoning Ordinances, Maps & Regulations https://townofhertfordnc.com/planning_and_zoning

⁵² Town of Hertford. Strategic Goals & Objectives. "Strategic Plan 2023-2024" <https://townofhertfordnc.com/goals-objectives>. September 11, 2023.

⁵³ NC Military Bases. <http://militarybases.com/north-carolina/>

⁵⁴ Federal Aviation Administration (FAA). *National Plan of Integrated Airport Systems (NPIAS) Report*. https://www.faa.gov/airports/planning_capacity/npias

⁵⁵ NC DOT. *Airport Locations*. <https://www.ncdot.gov/divisions/aviation/Pages/nc-airports.aspx>

⁵⁶ NC DOT. *Rail & Rail-Related Maps* <https://connect.ncdot.gov/resources/Rail-Division-Resources/Pages/Rail-RelatedMaps.aspx>

⁵⁷ NC DOT. *Railroad Crossing Map* <https://connect.ncdot.gov/business/trucking/Pages/Rail-Crossing-Map.aspx>

⁵⁸ NC DOT. *High Profile Projects & Studies*. <http://www.ncdot.gov/projects/>

⁵⁹ NC DOT. *Projects- Planning*. Comprehensive Transportation Plans. <https://connect.ncdot.gov/projects/planning/Pages/Comprehensive-Transportation-Plans.aspx>

⁶⁰ NC Department of Environmental Quality (DEQ). Division of Water Resources (DWR). *Local Water Supply Plans*. http://www.ncwater.org/Water_Supply_Planning/Local_Water_Supply_Plan/search.php

⁶¹ U.S. National Park Service. *Park Listing*. North Carolina. <http://www.nps.gov/state/nc>

⁶² NC Department of Natural and Cultural Resources. Division of Parks and Recreation. *Find a Park*. <http://www.ncparks.gov/find-a-park>

⁶³ Perquimans County, NC. *Parks & Recreation*. <https://www.perquimanscountync.gov/recreation>

⁶⁴ NC State Historic Preservation Office (SHPO). *North Carolina Listings in the National Register of Historic Places*.

<https://www.ncdcr.gov/about/history/division-historical-resources/state-historic-preservation-office/architectural-7>

⁶⁵ NC SHPO. GIS. <http://gis.ncdcr.gov/hpweb/>

There are no Superfund⁶⁶ sites within Perquimans County^{67,68,69}. However, there are several hazardous sites scattered throughout the county, that are regulated and monitored by the U.S. Environmental Protection Agency (EPA) for permitting and compliance (See **Figure 5**). Due to the scattered locations, there does not appear to be one area disproportionate to another in regard to proximity to hazards. It is noted that these sites rely on close proximity to transportation corridors. Information about the following monitoring programs and individual site data are readily available online for the public.

- Hazardous Waste Sites- Resource Conservation and Recovery Act Information (RCRA)⁷⁰
- Air Emissions Integrated Compliance Information System (ICIS) for Clean Air Act⁷¹
- Water Discharge Permit Compliance System (PCS/NPDES) for Clean Water Act⁷²
- Toxics Release Inventory (TRI)⁷³
- Brownfields (*Assessment, Cleanup and Redevelopment Exchange System*- ACRES)⁷⁴
- Toxic Substances Control Act (TSCA)⁷⁵

⁶⁶ U.S. EPA. Superfund. <https://www.epa.gov/superfund>

⁶⁷ U.S. EPA. NEPAassist Mapping Tool. <https://www.epa.gov/nea/nepassist>

⁶⁸ U.S. EPA. Enforcement and Compliance History Online (ECHO) Listed Facilities Reports. <http://echo.epa.gov/>

⁶⁹ U.S. EPA. EnviroFacts. <http://www3.epa.gov/enviro/>

⁷⁰ U.S. EPA. Resource Conservation and Recovery Act Information (RCRA) Compliance Monitoring <https://www.epa.gov/compliance/resource-conservation-and-recovery-act-rcra-compliance-monitoring>

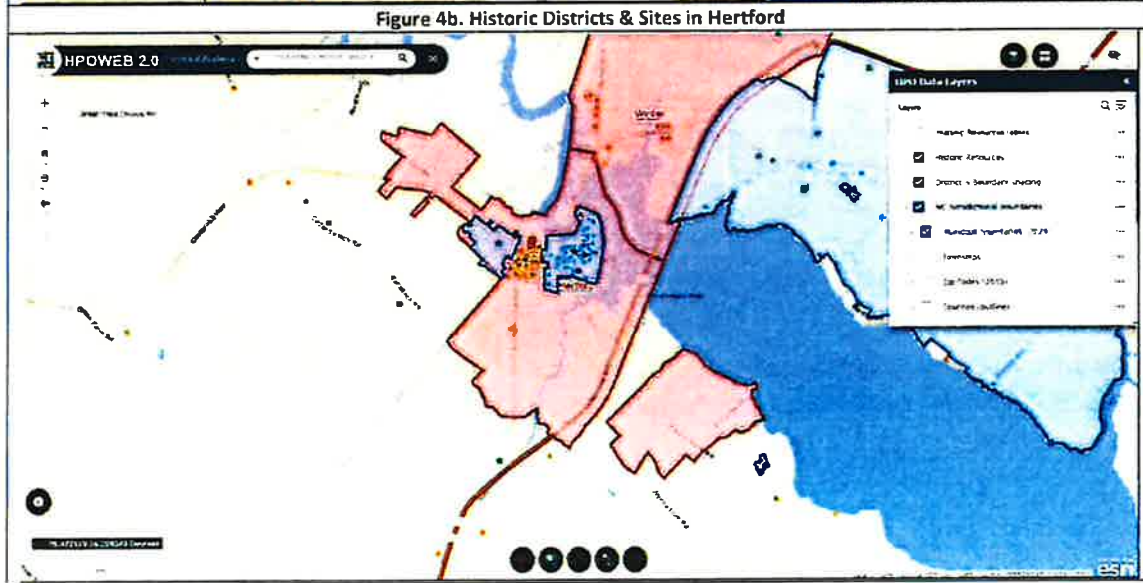
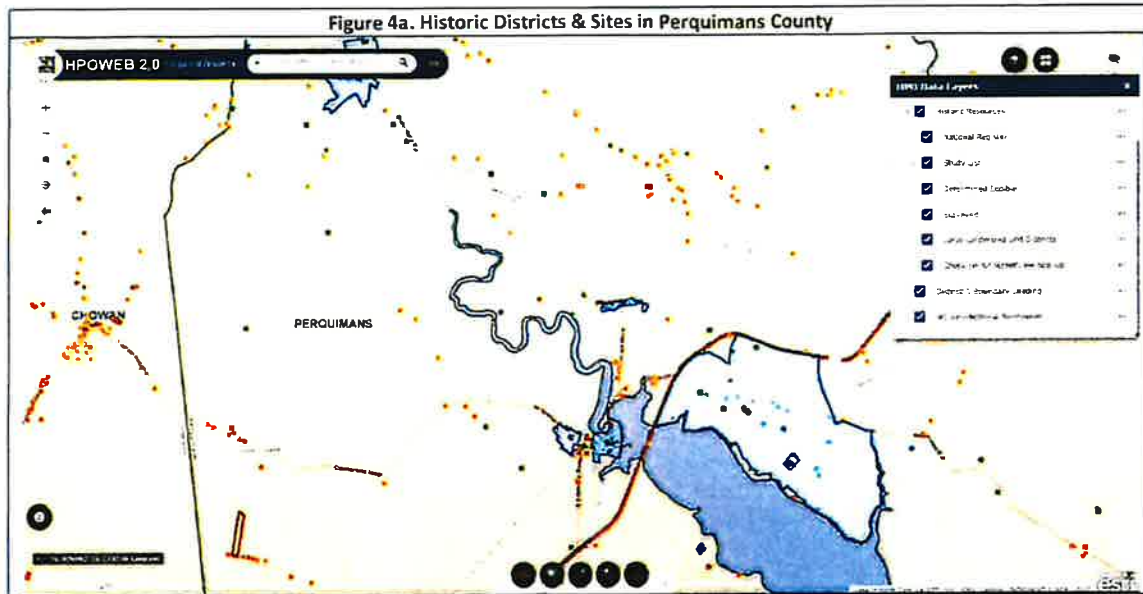
⁷¹ U.S. EPA. ICIS- AIR Overview. <https://www.epa.gov/enviro/icis-air-overview>

⁷² U.S. EPA. Clean Water Act (CWA) Compliance Monitoring. <https://www.epa.gov/compliance/clean-water-act-cwa-compliance-monitoring>

⁷³ U.S. EPA. Toxic Release Inventory (TRI) Program. <https://www.epa.gov/toxics-release-inventory-tri-program/learn-about-toxics-release-inventory>

⁷⁴ U.S. EPA. Brownfields. <https://www.epa.gov/brownfields>

⁷⁵ U.S. EPA. Toxic Substance Control Act (TSCA). <https://www.epa.gov/enforcement/toxic-substances-control-act-tsca-and-federal-facilities>



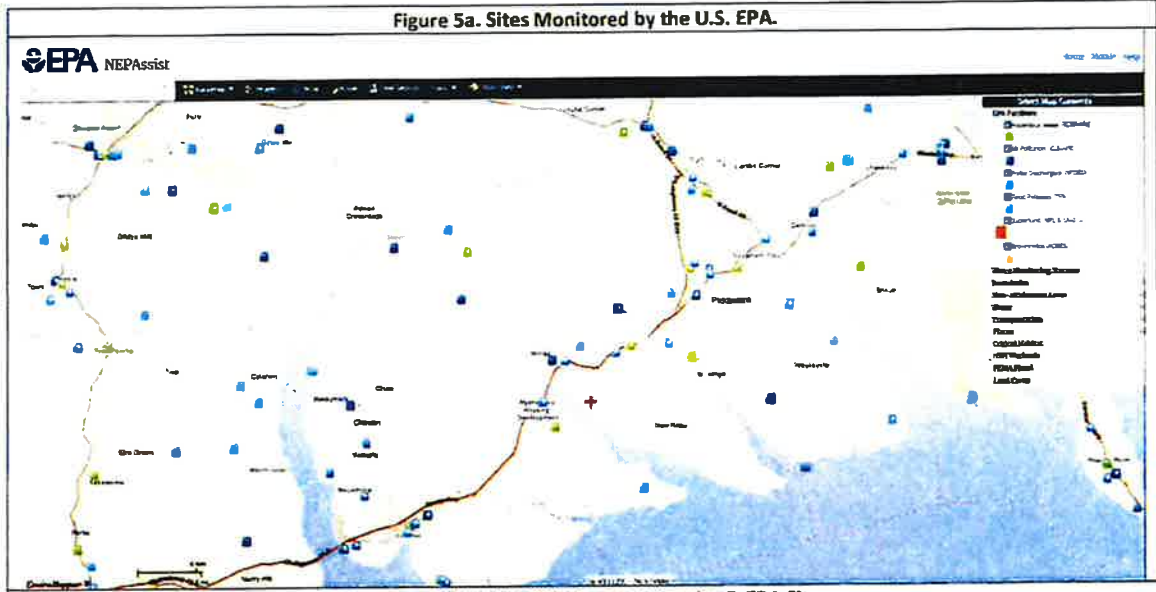


Figure 5b. 2012-2016 ACS Percent Minority & EPA Sites.

Based on a combination of data drawn from Figures 1, 2, and 5a., sites monitored by the U.S. EPA do not seem to disproportionately affect minority persons within the Town.

Figure 6a. Perquimans County 2015 CTP, Bicycle Map

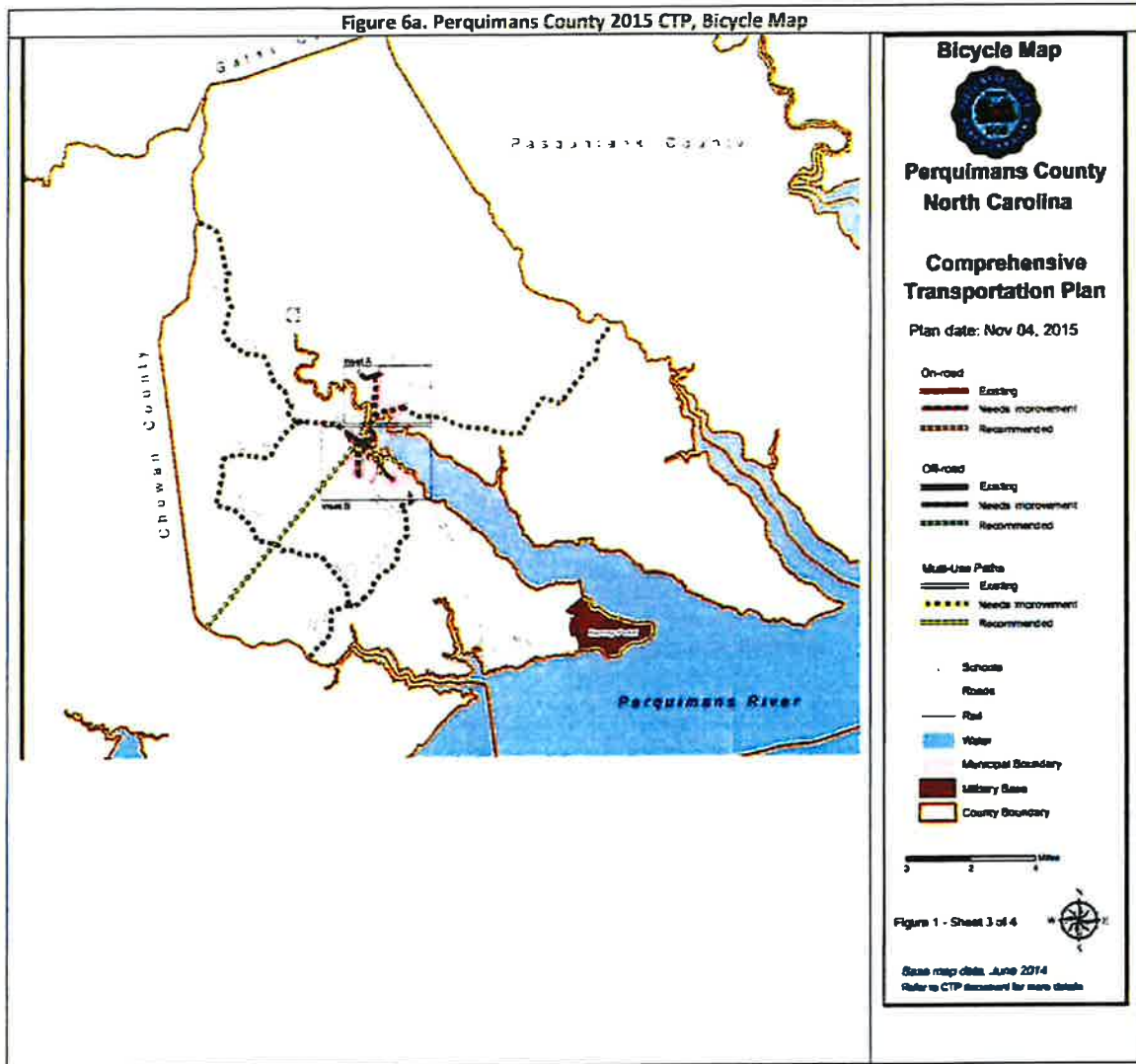


Figure 6b. Perquimans County 2015 CTP, Highway Map

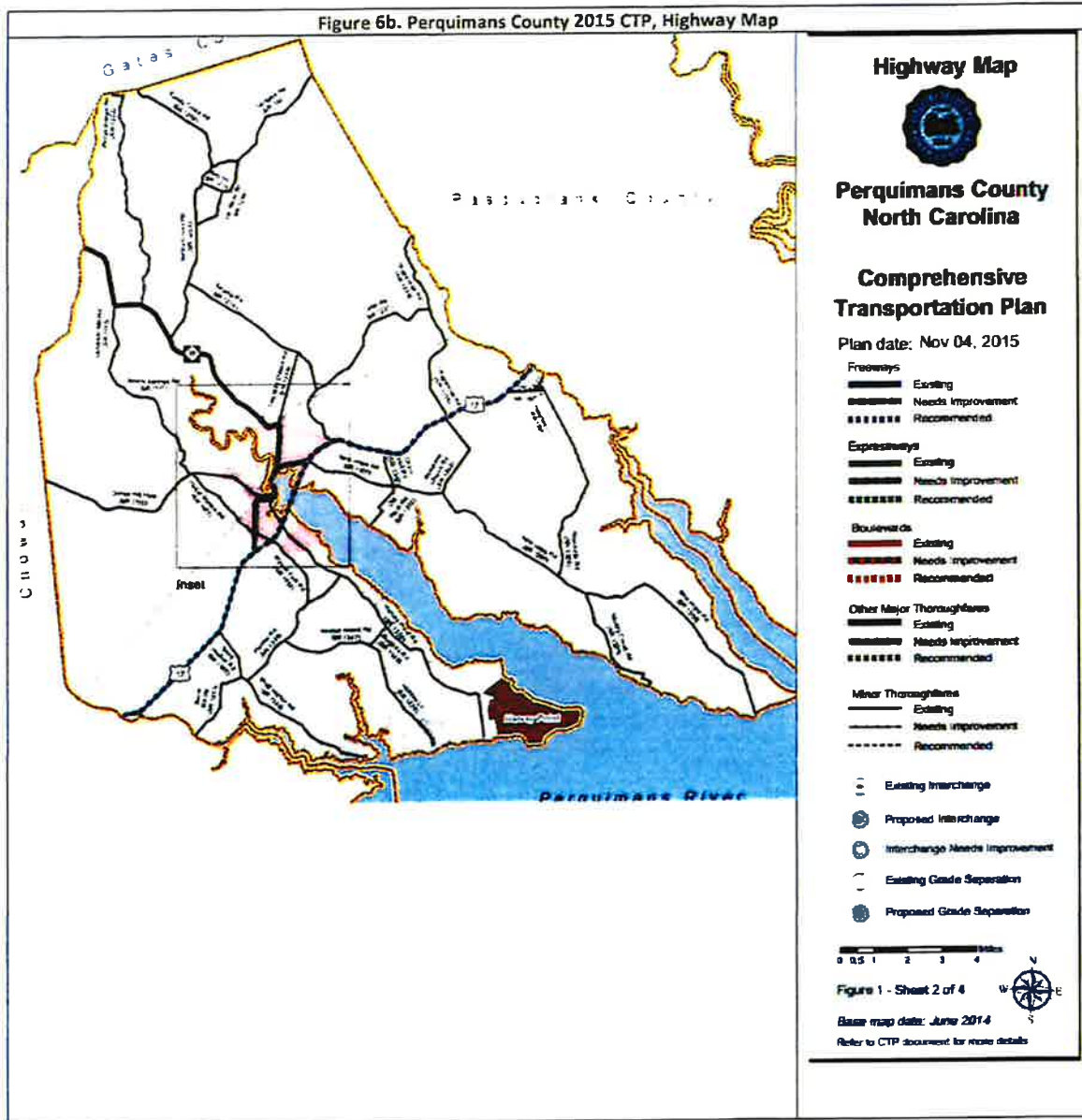
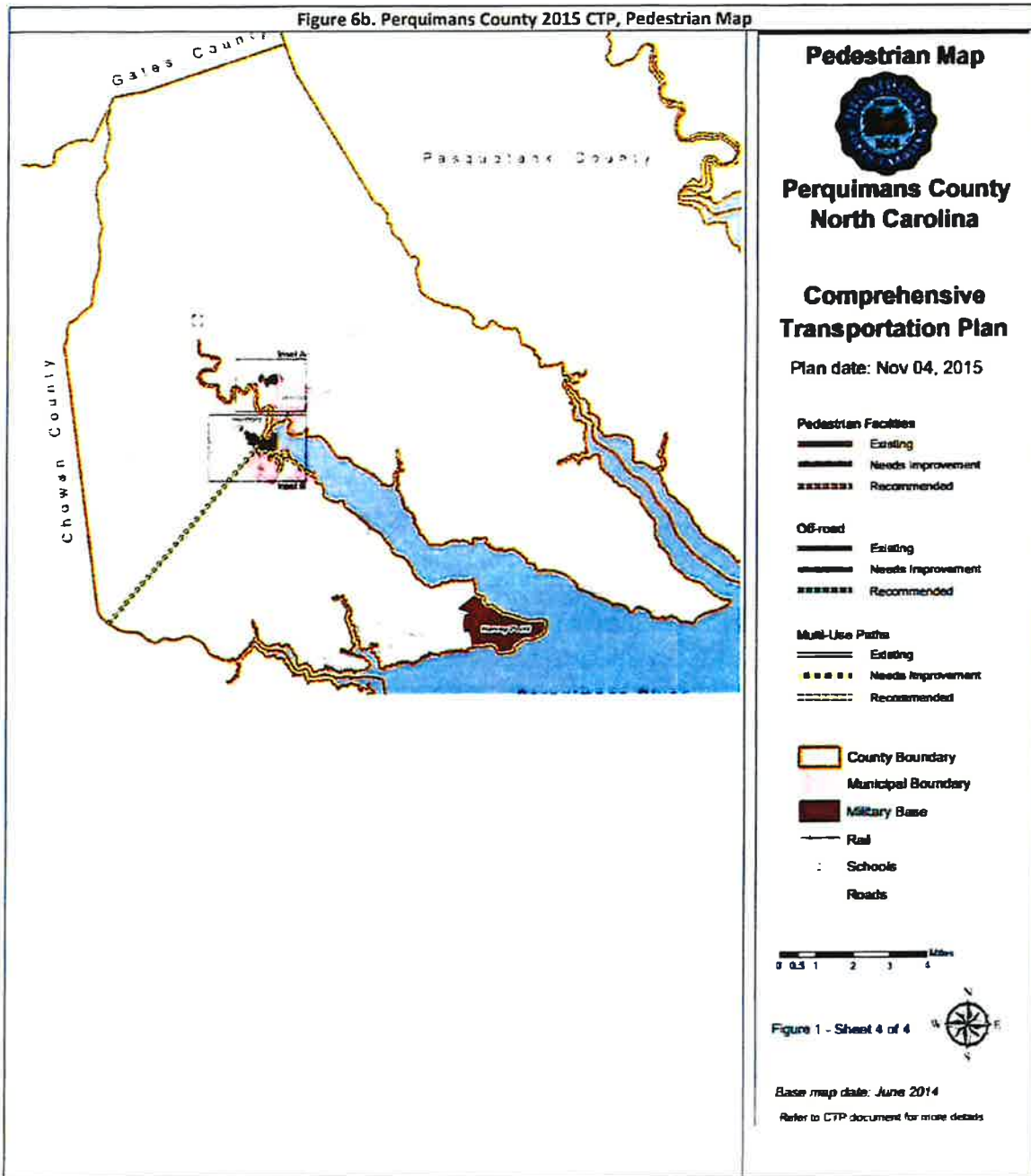


Figure 6b. Perquimans County 2015 CTP, Pedestrian Map



4.0 ASSESSMENT OF FAIR HOUSING DATA

EXISTING PROGRAMS AND ACTIVITIES

Enforcement Self-Evaluation

1. Does the community have a fair housing ordinance?

The Town of Hertford does not have a specific fair housing ordinance. The Town has adopted a Fair Housing Plan. This plan is active and ongoing based on the availability of grant funding and as a qualification of grant conditions, these elements of fair housing are being constantly updated and reviewed on a quarterly basis for compliance.

2. What mechanism exists for citizens to file complaints alleging illegal discrimination in programs or services funded by your jurisdiction?

The Town has a Complaint Procedure (routinely published in the local newspaper), which states that persons wishing to file complaints can contact the Town Manager, who must acknowledge within ten (10) days of receipt of a written complaint and that the Town will inform the North Carolina Department of Environmental Quality (NC DEQ) and the North Carolina Human Relations Commission (NCHRC) about the complaint. The Town Manager will assist the Commission in the investigation and reconciliation of all housing discrimination complaints, which are based on events occurring in the Town.

3. Do you have an Affirmative Marketing Plan?

The Town has adopted an Equal Housing Opportunity Plan, Equal Employment Opportunity Plan, and CDBG Section 3 Plan for employment opportunities for local businesses, minority and women-owned businesses, historically and underutilized businesses, and lower income workers. In addition, Hertford has adopted Housing Rehabilitation Guidelines for use in its CDBG project areas. This fluid document is revised accordingly as new regulations and guidelines are imposed by the funding agency.

4. The number of discrimination complaints filed with North Carolina Human Relations Commission, Civil Rights Division or HUD originating in your Jurisdiction and the results of this investigation:

The Civil Rights Division within the NC Department of Administration⁷⁵ (where NCHRC is currently housed) was contacted concerning local fair housing complaints, with no known issues.

6. Number of findings related to Fair Housing or Equal Opportunity issued against your Jurisdiction and the corrective action taken.

At this time, there are no findings from the funding agency.

Education and Outreach Efforts

1. Identify all resources available for the promotion of fair housing and equal opportunity.

Fair Housing materials are distributed at Town of Hertford government offices and other buildings accessible to the public. Fair Housing advertisements are published in *The Perquimans Weekly* (or other

⁷⁵ NC Office of Administrative Hearings. *Civil Rights Division*. <https://www.oah.nc.gov/civil-rights-division>

local newspaper). Fair Housing materials obtained from NC Legal Aid and NC Human Resources Commission are also posted online, at local events, the local public library, and other public buildings. Fair Housing Complaint Procedures and Brochures are sent to local housing related industries, Hertford Housing Authority, and lending institutions for educational purposes.

2. How are citizens made aware of these activities?

Through the above-named sources.

3. List all such activities during the past two years. What were the results of these activities?

The Town of Hertford has not had a CDBG grant open in the past two years.

Examination of Public Policy and Programs

1. Do current site selection policies have a disproportionate impact based upon a protected basis? If so, is there a nondiscriminatory reason for this policy and is there an alternative that would have a less discriminatory impact?

No

2. Are municipal services equitably distributed throughout the community?

Yes. These include water, sewer, garbage and trash collection, street and storm drainage maintenance, recreation, etc. Hertford provides electrical services to all residential and commercial customers within its corporate limits⁷⁷. Natural gas service is provided through Piedmont Natural Gas.

3. Are there any zoning requirements that have the effect of limiting housing opportunities to protected groups?

No limiting effects have been found. The Town of Hertford allows residential uses in nine (9) districts. Single family dwellings are located in nine residential districts. Duplexes are allowed in six residential districts. Multi-family homes are allowed in four residential districts. Only mobile home residential housing zoning is limited to a single area of the Town, yet no data found implies this is discriminatory⁷⁸.

4. Are there any Community Development or Public Housing Authority activities or programs that have the effect of perpetuating segregation?

No. The Town has an active Public Housing Authority which also manages public housing in Perquimans County. The Town of Hertford has sought multiple funding sources for public water and sewer rehabilitation. Low-income neighborhoods, with or without minority concentrations, have been targeted for this work. These programs have not intentionally served to perpetuate segregation, but by maintaining and improving homes in existing low income and/or minority neighborhoods, integration may have been slowed. The Town has taken a proactive approach in integrating the community with all socio and economic factors and will continue to pursue equality for all eligible participants.

⁷⁷ Town of Hertford. Public Works. <https://townofhertfordnc.com/public-works>

⁷⁸ Town of Hertford. Hertford Zoning Map. https://townofhertfordnc.com/planning_and_zoning

5. Are the Boards and Commissions representative of the Community?

The Hertford Town Council consists of two black females, one black male, one white male, and one white female. There are also several advisory boards, commissions, and committees.

Discrimination in the Rental Market

1. Are there any zoning requirements that have the effect of limiting the availability of rental units within the jurisdiction?

No

2. Where are rental units located? Are they located in areas of minority concentration?

Rental units are generally located throughout the Town of Hertford.

3. Where are the public housing units located?

There is one (1) public housing facility, and four (3) USDA-Rural Developments located throughout the Town. The 4 affordable housing complexes located in/near Hertford provide a collective 162 housing units to the community⁷⁹. These units offer Section 8, Section 521, or Section 515 Rural Rental Housing. These locations include:

- Hertford Housing Authority – 104 White St. – Public Housing
- Albemarle Village – 100 Arpdc St. – Elderly, Section 515/521
- Amsterdam Apts. – 105 Dobbs St. – Family; Low-income; 30% of income
- Bradford Apts. – 100 Brace St. – Family; low-income; 30% of income
- Wynne Fork Apts. (managed by Hertford Housing Authority) – Wynne Fork Dr. – Family; low-income; 30% of income

The NC Housing Coalition lists many of the resource opportunities⁸⁰. The Hertford Housing Authority oversees low-income housing, including the application process, eligibility guidelines, and related resources.⁸¹ Unfortunately, the waitlist for housing is approximately 5-7 years for a single bedroom, and 2-3 years for 2-, 3-, and 4-bedroom units.

4. Determine what barriers exist for protected class members in the rental market.

A connecting issue for most communities is that there may be a deficit of available affordable private rental units for larger families where the housing costs are under 30% of the household income. The major barrier would be the lack of available rental units, especially for large families and disabled persons. However, as the Town is providing assistance through various programs such as the Housing Development Program, a set percentage of those units must be allocated for varying incomes and physical handicaps. In addition to affordable housing managed through the Hertford Housing Authority, there are several Low-Income Apartment communities in Hertford.

⁷⁹ NC Housing Coalition. *Housing Resources in Perquimans County*. <http://nchousing.org/wp-content/uploads/2016/12/Perquimans-County-Housing-Resources.pdf>

⁸⁰ NC Housing Coalition. *Housing Resources in Perquimans County*. <http://nchousing.org/wp-content/uploads/2016/12/Perquimans-County-Housing-Resources.pdf>; <https://nchousing.org/resources-referrals/>

⁸¹ Town of Hertford, North Carolina. [https://townofhertfordnc.com/boards#:~:text=dwalton@townofhertfordnc.com,Hertford%20Housing%20Authority,Downtown%20Hertford%20\(formerly%20HHI\)](https://townofhertfordnc.com/boards#:~:text=dwalton@townofhertfordnc.com,Hertford%20Housing%20Authority,Downtown%20Hertford%20(formerly%20HHI))

5. Are vouchers and Section 8 certificate holders able to find housing throughout the community? If not, identify the barriers that face them.

Section 8 vouchers are available for rental units throughout the Town. However, there is a long waiting list at the Hertford Housing Authority due to the lack of rental dwellings available. It is often hard to find subsidized rental units for large families or disabled tenants.

6. Is steering an issue for protected class members?

No. There have been no complaints filed with the Town of Hertford or the NC Human Relations Commission.

7. Is housing available for families with children and persons with disabilities?

There is a need for more three and four-bedroom rental units. Since the majority of the single-family rental units are older housing stock, few of these units are accessible to persons with disabilities.

Discrimination in the Sales Market

1. Does the Local Association of Realtors have a MLS Service⁸²?

Yes

1. Is the Local Association of Realtors a VAMA⁸³ signatory?

VAMA no longer exists.

2. Is there any evidence of racial steering or blockbusting within the local market?

No

3. What are the relative housing values for minority and non-minority communities of similar economic composition?

It is estimated that the property values within primarily minority census tracts are lower than neighboring non-minority census tracts. This could be attributed to the age and condition of some of the dwelling units as well as the small size of these older lots. Older residential lots were established long before any zoning and subdivision regulations were adopted by the Town.

4. Can nondiscriminatory reasons for these differences be identified? If yes, list them.

The major nondiscriminatory reason for the minority census tracts having lower property values is that the homes are older and smaller. The lots are often small and not as desirable to homebuyers. This can be attributed to these older neighborhoods being established prior to planning, zoning, and subdivision requirements.

5. Identify any barriers to homeownership opportunities within your jurisdiction.

⁸² Albemarle Area Association of Realtors. <https://www.ar-nc.com/forms/#additional-forms>

⁸³ National Association of Realtors. *Fair Housing and Property Rights: a History*. <https://www.nar.realtor/fair-housing-act/fair-housing-makes-us-stronger-commemorating-50-years-of-the-fair-housing-act/fair-housing-and-property-rights-a-history>

Probably the largest barrier to homeownership within the Town of Hertford is the lack of knowledge of the home-buying process. In addition, poor credit histories make it difficult for low- and moderate-income persons to reach allowable debt-to-income ratios established by financial institutions.

Persons with disabilities may encounter additional barriers when seeking to purchase a home. Few homes can be entered by a person in a wheelchair. Another is the process of adapting a home to meet the needs of a disabled person. Adaptations can be costly depending on the home and the needs of the person. Tax credits are available to homebuyers who want to make adaptations for persons with disabilities. This information needs to be provided to more potential homebuyers.

Discrimination in the Financing

1. Are local lenders signatories of HUD’s Best Practices Program?

Unknown. The voluntary Fair Lending “Best Practices” Agreement between HUD and the Mortgage Bankers Association of America was initiated in 1994. The HUD Best Practices Program started in 1997 for public housing authorities. The Town will send educational outreach materials to local lenders during the lifetime of the Town’s CDBG grant.

2. Examine the Home Mortgage Disclosure Act (HMDA) information in your area. Is there evidence of higher denial rates for minorities and low-income individuals?

HMDA data is only available at the Perquimans County Level⁸⁴. Low-income status is not available in the dataset provided. Based on the 2023 data from the HMDA data browser, there is not higher denial rates for minorities or Hispanic persons.

Selected Variables	# of Records	\$ Amount
Application denied, 2 or more minority races	0	0
Application denied, American Indian or Alaska Native	1	75,000
Application denied, Asian	0	0
Application denied, Black or African American	35	5,345,000
Application denied, Free Form Text Only	0	0
Application denied, Joint	3	385,000
Application denied, Native Hawaiian or Other Pacific Islander	0	0
Application denied, Race Not Available	19	3,035,000
Application denied, White	94	12,150,000

Selected Variables	# of Records	\$ Amount
Application denied, Ethnicity Not Available	31	5,105,000
Application denied, Free Form Text Only	0	0
Application denied, Hispanic or Latino	7	805,000
Application denied, Joint	2	35,000
Application denied, Not Hispanic or Latino	113	15,405,000

⁸⁴ HMDA Data Browser. <https://ffiec.cfb.gov/data-browser/data/2023?category=counties&items=37143>
(Filters: Perquimans County, Action Taken – Application Denied, Ethnicity)

3. Is there evidence of illegal redlining?

Unknown

4. Are banking services available on an equal opportunity basis?

Banks and lending institutions are located in various locations throughout the Town. Banks have also been involved with the First-time Homebuyer Down Payment Assistance Program.

5. Examine the Community Needs Assessments and Community Reinvestment Activities of local Banks to determine the adequacy of these activities as compared to community needs as determined through the jurisdiction's planning process.

The HUD Community Needs Assessment Program is initiated at the national level by the HUD Regional Offices. As of 2017, Hertford is not in a location selected for this analysis⁸⁵.

The Community Reinvestment Act (CRA) of 1977⁸⁶ requires federal banking oversight agencies to monitor banks for CRA compliance. Based on a search of the FDIC, FRB, and OCC databases, one bank in Hertford was monitored and received a satisfactory CRA Performance Evaluation in 1992.

Discrimination in the Building and Construction Industry

1. Do local building codes include the requirements of the Federal Fair Housing Act (FFHA) of 1988?

No. The Town of Hertford has adopted the State of North Carolina Building codes. The Home Builders Association of Northeastern North Carolina⁸⁷ (HBAENC) receives fair housing and accessibility information from HUD and in turn filters this information down to local members as necessary.

2. How many single-family and multi-family dwellings funded by local (including non-for-profits), state, or federal funds have been built in the past 20 years? Are they in compliance with FFHA requirements? ADA requirements? Section 504?

a) How many multifamily dwellings funded by local, state, or federal funds have been built since March, 1991?

According to building permit data (<https://socds.huduser.gov/permits/>), a total of 1441 single family units and 0 multifamily homes were constructed in Perquimans County with private funds between 2001 and 2023; 857 of which were constructed before 2009.

b) Are they in compliance with FFHA requirements? ADA requirements? Section 504?

Yes

3. Is there an identified community need for housing for persons with disabilities?

Yes

4. Is there an identified community need for the construction of more affordable housing?

⁸⁵ HUD. HUD Archives: Community Needs Assessment Initiative. <https://archives.hud.gov/initiatives/cna/index.cfm>

⁸⁶ Federal Reserve. Community Reinvestment Act (CRA). https://www.federalreserve.gov/consumerscommunities/cra_about.htm

⁸⁷ Home Builders Association of Northeastern North Carolina (HBAENC). <https://www.hbanenc.org/about-the-hba.html>

Yes

BARRIERS TO EQUAL HOUSING OPPORTUNITIES

With this 2025 Analysis of Impediments to Fair Housing, while local improvements have been made in the last decade, it appears that access to quality affordable housing in a range of sizes is the main local impediment. Fortunately, the Town has very active staff, Council, and community leaders that promote comprehensive economic development programs to help combat this housing impediment.

NCHFA currently has resources available for new homebuyers⁸⁸, including infographics, e-books, videos, blogs, calculators, and housing counselors to assist home buyers with their purchase. All of this information is available in English, Spanish or any other language requested on their website. NCHFA also offers Homebuyer Express⁸⁹, which is a course to learn about the home buying process. Discounts are available to the program.

Funding is very limited and competitive, so the Town is unable to provide substantial direct assistance to address lack of affordable housing stock and affordable rental units. However, the Town encourages partnerships and continues to seek funding assistance for economic development, infrastructure improvements, and community amenity projects that can indirectly serve as catalysts for private investment in enhancing affordable housing options for residents. Examples of such partnerships and housing-related resources include the Hertford Housing Authority⁹⁰, the Albemarle Commission⁹¹, and the Perquimans County Center for Active Living⁹².

⁸⁸ NC Housing Finance Agency. *Buying a Home in North Carolina?* <https://www.nchfa.com/home-buyers>

⁸⁹ NC HFA. *Community Home Buying Programs.* <https://www.nchfa.com/home-buyers/buy-home/community-home-buying-programs>

⁹⁰ Hertford Housing Authority. <https://townofhertfordnc.com/boards>

⁹¹ The Albemarle Commission. <https://albemarlecommission.org/>

⁹² Perquimans County Center for Active Living. <https://pctiveliving.org/about>

5.0 IDENTIFICATION OF FAIR HOUSING PRIORITIES & GOALS

SMART Goals - Characteristics of Effective Goals	
Specific	Provide enough detail to establish what the community wants to accomplish. Specific goals are more easily measured than vague goals. Provide the necessary specificity either in the statement of the goal itself or in the metrics and milestones that you identify to measure achievement of the goal.
Measurable	Develop one or more specific metric(s) and milestone(s) that can be used to measure success in achieving the goal.
Action-Oriented	Goals should describe measures to be taken, rather than simply express an aspiration for change. The goal may call for very specific actions (fund 30 units of affordable housing in the X neighborhood) or describe a broader objective that will subsequently be translated into specific action steps (increase educational opportunities in the X neighborhood).
Realistic	Understand and explain the limitations of the situation, including those set by available resources, capacity, and political will.
Time-Bound	Establish a deadline and a specific timeframe for the achievement of each of the fair housing goals set.

Goal	Contributing Factor	Fair Housing Issue(s)	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Increase local fair housing enforcement efforts & communication/ outreach	Enforcement, Outreach Capacity, & Resources.	There has been adequate outreach capacity but minimal public involvement/ response. Lack of public interest in communication about fair housing.	Continue to expand outreach and conduct multiple distribution methods and collaborating partners for the life of the grant.	Town Council & Staff
Have one public meeting for the community to understand Fair Housing	Enforcement & Outreach: Need for information	Education	Once per year	Town Council & Staff
Research and establish more Economic Development programs	Affordable Housing; Economic Opportunities	Resources	Ongoing research to find appropriate programs for grants and loans. Positive development for the Town.	Town Council & Staff

The Town will continue comprehensive educational efforts regarding fair housing, as well as promoting economic and community development initiatives. The combination of education and business development will assist in combatting affordable housing impediments within the Town.