

Agenda

Greenville City Council

August 6, 2007 6:00 PM City Council Chambers 200 West Fifth Street

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- I. Call Meeting To Order
- II. Invocation Council Member Glover
- III. Pledge of Allegiance
- IV. Roll Call
- V. Approval of Agenda
- VI. Consent Agenda
 - 1. Minutes for the June 11 and June 14, 2007 City Council meetings
 - 2. Resolution amending the Board and Commission Policy by removing references to the Citizens Advisory Commission on Cable Television
 - 3. Appointment Reporting 2006-2007 County & Municipality Appointments Forms
 - 4. Resolution accepting dedication of rights-of-way and easements for Cross Creek Townhomes; Davencroft, Phase One; South Pointe, Sections 2 & 3; Vancroft Townhomes, Lot 104, Section 2; Vancroft, Section 2; Bedford, Section 10, Phase 2; and Taberna, Phase 3
 - 5. Contract award for Colonial Heights Drainage Improvements Project
 - 6. Contract award for Westhaven Drainage Improvements Project
 - 7. Police Department use of the Governor's Highway Safety Program law enforcement liaison grant

- 8. Report on bids awarded
- 9. Various tax refunds

VII. Old Business

10. Resolution to close a portion of South Washington Street to Dickinson Avenue, a portion of West Sixth Street from South Washington Street to Evans Street, and Dickinson Avenue from South Washington Street to Reade Circle

VIII. New Business

- 11. Presentation by Boards and Commissions
 - a. Historic Preservation Commission
 - b. Housing Authority
- 12. Contract award for Sixth Street Relocation Project engineering design
- 13. National Community Reinvestment Coalition report on lending in metropolitan areas
- **IX. Review of** August 9, 2007 City Council Agenda
- X. Comments from Mayor and City Council
- XI. City Manager's Report
- XII. Adjournment



City of Greenville, North Carolina

Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Minutes for the June 11 and June 14, 2007 City Council meetings

Explanation: The minutes of the June 11 and 14, 2007 City Council meetings have been

prepared and are attached for Council review and consideration.

Fiscal Note: None

Recommendation: Approval of the June 11 and 14, 2007 City Council minutes.

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Attachments / click to download

□ June 11 2007 City Council Minutes 700686

June 14 2007 City Council Minutes 703146

MINUTES PROPOSED FOR ADOPTION BY CITY COUNCIL

Greenville, NC June 11, 2007

The Greenville City Council met in a regular meeting on the above date at 6:00 PM in the City Council Chambers, third floor of City Hall, with Mayor Robert D. Parrott presiding. The meeting was called to order, followed by the invocation by Council Member At-Large Pat Dunn and the pledge of allegiance to the flag. The following were present.

Mayor Robert D. Parrott
Mayor Pro-Tem Mildred A. Council
Council Member Ray Craft
Council Member Pat Dunn
Council Member Rose H. Glover
Council Member Chip Little
Council Member Larry Spell
Wayne Bowers, City Manager
Wanda T. Elks, City Clerk
David A. Holec, City Attorney

Mayor Parrott asked that there be a moment of silence for former Mayor Nancy M. Jenkins, who passed away on Friday.

APPROVAL OF THE AGENDA

Motion was made by Mayor Pro-Tem Council and seconded by Council Member Glover to approve the agenda as presented. Motion carried unanimously.

SPECIAL RECOGNITIONS

Presentation of the George C. Franklin Award by the North Carolina League of Municipalities

Mr. Ellis Hankins, Executive Director of the North Carolina League of Municipalities, recognized Assistant City Manager Thom Moton, a recent graduate of the 2006-07 Municipal Administration Course at the School of Government, as the George C. Franklin Award winner. This Municipal Administration program is a 150-hour class designed for municipal officials whose responsibilities require a broad understanding of functions beyond their individual areas of specialization. The North Carolina League of Municipalities presents the award each year to the class member with the most distinguished record. The award is given in honor of the League's former general counsel, George C. Franklin.

Mr. Hankins further extended his condolences to the family of Nancy Jenkins, expressing appreciation to the service she provided to the North Carolina League of Municipalities, especially during her 1993-1994 presidency.

Youth Council Graduates

Mayor Pro-Tem Council announced the youth from the Youth Council that will be graduating from high school this year—Waseem Ahmed (D. H. Conley High School), Robyn Carter (J. H. Rose High School), Ashlee Daniels (Greenville Christian Academy, Dorienne Evans (South Centra High School), Johnathan Fields (Farmville Central High School), Yolanda Gardner (North Pitt High School), Porsche Hunter (D. H. Conley), Parteek Singla (J. H. Rose High School), and Nancy York (J. H. Rose High School).

APPROVAL OF CONSENT AGENDA - APPROVED

Motion was made by Council Member Spell and seconded by Mayor Pro-Tem Council to approve all the items under the consent agenda as listed below. Motion carried unanimously.

- 1) Minutes from the April 23, 2007 Joint City Council-Greenville Utilities Commission meeting and the May 7 and May 10, 2007 City Council meetings
- 2) Resolution accepting dedication of rights-of-way and easements for Bedford, Section 9, Phase 2, and a revision to Lots 15 and 16 in Bedford, Section 9, Phase 1 (Resolution No. 07-39)
- 3) Resolution authorizing the disposal of surplus computer equipment to Pitt County Schools (Resolution No. 07-40)
- 4) Resolution amending the Personnel Policies to authorize City payment of premiums for dependent health insurance upon the death of a City employee (Resolution No. 07-41)
- 5) Report on bids awarded

CITIZENS ADVISORY COMMISSION ON CABLE TELEVISION

Council Member Spell announced that since the franchising authority has transferred from the local to the State level, the Citizens Advisory Commission on Cable Television has determined that its role should be to deal with GTV. The Commission suggested that even though GTV is run superbly, the Commission wants to make sure it continues to run well as administration and staff change. Seeking public opinion is one of the most important functions of the committee. It is hoped that the framework will be set up to ensure that GTV is the voice of the people and that the communication between GTV and the people is strong. It is important to have a group of citizens focusing strongly on this and making sure that staff is strongly advised. It is not anticipated that the Commission will need to meet monthly or that it will need to tell the staff what to do. The Commission will be purely advisory, keeping tabs on what the community wants and advising Council on what it wants to do. There will be a need for meeting only two times a year; however, it is important to have a body focused on this mission.

Council Member Craft expressed that it is difficult to get people interested if they only meet twice a year. This ordinance creates something that is not needed. The Public Information Officer already has someone to report to, and another layer of authority is not needed. Council Member Craft suggested that the Commission be disbanded and that the Public Information Officer continue to report to and receive input through the Assistant City Manager and City Manager.

Council Member Little stated that the current responsibilities and duties of the Citizens Advisory Commission on Cable Television include "(2) to assist in the establishment and operation of the government access channel and programming and to make recommendations to the City Council for changes or improvements in government access programming" and "(9) to assist city departments, agencies, boards and commissions with appropriate use of government access programming." Those are the primary responsibilities of the proposed new commission. The Commission currently has that charge, so a new commission is not needed. Council Member Little stated that he is in favor of leaving it as it is.

Council Member Spell stated that the new ordinance strips away the items no longer necessary and renames the commission; however, it would have the same membership. It is simply "tweaking" the role. There has been a tremendous change in the government channel in the recent past. The City now has the technology and equipment to do serious programming. It is important to have a public body looking at this avenue and advising into the future. If a year passes and they still can't get a quorum, it can be dissolved.

Upon asking who the Commission would advise, and being told that would be the Public Information Officer, Council Member Dunn suggested having an ad hoc committee to do the same thing if the Council feels a board wouldn't be appropriate. This committee could meet once a year and come up with suggestions if the Council wants more public input. She stated that all boards and commissions recommend policy to the Council as opposed to the staff. She would like to see it clarified that it is serving in an advisory capacity and the advice doesn't always have to be accepted.

Council Member Dunn stated that a committee would need to understand that it is an advisory group and they will need to understand what they can do and what they cannot do. The committee members will need to know that they are making suggestions, not decisions.

Council Member Little stated that GTV currently has outstanding programming. He is concerned about the role of the commission and feels that it almost needs to be policy oriented.

Mayor Parrott questioned why a Commission is needed if it has no authority.

Motion was made by Council Member Craft to adopt the ordinance repealing Article G of Chapter 3 of Title 2 of the Greenville City Code dissolving the Citizens Advisory Commission on Cable Television. Motion was seconded by Council Member Little and carried with a vote of 4:2. Council Members Glover, Craft, Little and Dunn voted in favor of the motion. Mayor Pro-Tem Council and Council Member Spell voted in opposition.

Motion was made by Council Member Dunn and seconded by Council Member Spell to instruct staff to come back with a proposal for an ad hoc committee. Motion carried unanimously.

PRESENTATIONS BY BOARDS AND COMMISSIONS

Planning and Zoning Commission

Mr. Len Tozer, Chairman of the Planning and Zoning Commission, gave the purpose of the Commission and recognized the members. He stated that in the past year, the Commission has considered 25 rezoning requests involving 1,967 acres, 20 preliminary plats involving 951 acres with 552 lots, three land use plan amendments involving 49 acres, 1 neighborhood plan for College Court/Coghill Subdivision, 2 land use intensity student housing special use permits for 748 dormitory type units consisting of 2,290 bedrooms, and 8 City Code amendments.

SUPPORT OF NOMINATION FOR ELECTRICITIES OF NORTH CAROLINA BOARD OF DIRECTORS - APPROVED

City Manager Bowers stated that Greenville currently does not have a member on the Electricities Board of Directors. The Greenville Utilities Commission has asked that the City Council support Ron Elks, General Manager, for that position.

Motion was made by Council Member Craft and seconded by Council Member Spell to approve the endorsement of support for Ron Elks, Greenville Utilities Commission General Manager, to be nominated as a candidate for the Electricities of North Carolina Board of Directors. Motion carried unanimously.

RESOLUTION DONATING ELM STREET LITTLE LEAGUE FIELD LIGHTS - ADOPTED

City Manager Bowers stated that the Little League originally donated the field lights for Elm Street Park. New lights have now been donated, and the Little League would like for the old lights to be relocated to J. H. Rose High School. Because of the urgency, this action is being taken before that of the Recreation and Parks Commission.

Motion was made by Council Member Little and seconded by Mayor Pro-Tem Council to adopt the resolution donating Elm Street Little League field lights to J. H. Rose High School, subject to concurrency by the Recreation and Parks Commission. Motion carried unanimously. (Resolution No. 07-42)

<u>CONTRACT AWARD FOR WEST THIRD STREET IMPROVEMENTS PROJECT -</u> APPROVED -

Mr. David Brown, City Engineer, informed the Council that the West Third Street Improvements Project is one of three projects to be done as a part of the General Obligation Bonds authorized in 2004. The project consists of performing various improvements to the segment of West Third Street from Tyson Street to Pitt Street that include widening portions of the road, replacement of curb/gutter and sidewalk, storm drainage improvements, utility adjustments and street resurfacing. As part of the project, Greenville Utilities will reimburse the City for adjustments to utilities affected by the project resurfacing in the amount of \$30,650. Bids were advertised and

received on May 22, 2007, and the lowest responsive bid was submitted by MHL Corporation, Inc. of Greenville, NC in the amount of \$752,161.45.

Motion was made by Council Member Craft and seconded by Council Member Dunn to award a construction contract for the West Third Street Improvements Project to HML Corporation, Inc. in the amount of \$752,161.45. Motion carried unanimously. (Contract No. 1601)

<u>SETTING OF FAIR MARKET VALUE FOR CITY-OWNED PROPERTY LOCATED AT</u> 1411 MARTIN LUTHER KING, JR. DRIVE - APPROVED

Mrs. Sandra Anderson, Community Development Administrator, stated that the appraisal for the fourth newly constructed home located at 1411 Martin Luther King, Jr. Drive has been completed, with an appraised value of \$93,000. The house contains 1241 square feet and has three bedrooms and two baths. The City Council needs to establish the fair market value. This home is owned by the City of Greenville and will be sold to a low to moderate income homebuyer who will occupy the home as their principal residence. This action would make the home available to interested buyers by the sealed bid method of sale.

Motion was made by Council Member Craft and seconded by Council Member Spell to approve setting the fair market value of 1411 Martin Luther King, Jr. Drive at \$93,000 based on the appraisal. Motion carried unanimously.

OFF-LEASH DOG AREA IN TAR RIVER ESTATES NEIGHBORHOOD

Assistant City Manager Moton provided an update on the off-leash dog area in the Tar River Estates neighborhood. There were 50 to 60 people at the first public meeting and 25 to 30 at the second. Several City employees volunteered their time towards this project. If Council tonight approves the construction of the off-leash dog area, staff will recommend a budget amendment on June 14 to appropriate from the contingency account \$17,584 for the purchase and installation of six foot of vinyl coated fencing.

Upon being asked how other areas that may wish to have an off-leash dog area would be handled, Assistant City Manager Moton replied that if they expressed an interest, staff would pursue the request. There are tangible benefits to having such an area, such as getting to know neighbors and having a safer environment because people are coming outdoors more often. Funding would be the issue. Staff would be receptive to moving to other areas.

Motion was made by Council Member Spell and seconded by Mayor Pro-Tem Council to approve the construction of the off-leash dog area in the Tar River Estates Neighborhood. Motion carried unanimously.

PROPOSED FISCAL YEAR 2007-2008 CITY OF GREENVILLE, GREENVILLE UTILITIES COMMISSION, PITT-GREENVILLE CONVENTION AND VISITORS AUTHORITY AND SHEPPARD MEMORIAL LIBRARY BUDGETS

City Manager Bowers stated that the proposed City budget incorporates the FY 2007-08 Financial Plan approved by the City Council on June 8, 2006 as adjusted by the changes proposed in the City Manager's budget message distributed to City Council on May 2, 2007. On May 7, some proposed adjustments were suggested, and a few others will be suggested tonight. On May 18, 2007, the City received from the State the March distribution of sales tax revenues, which was 34.6% above the distribution received by the City for March 2006. This significant increase appears to have been a correction to adjust for variations in previous distributions during the current fiscal year. Through the February distribution, total sales tax collections for eight months were only 3.5% above the previous year. By adding the March distribution, total sales tax received by the City through nine months now reflects a 6.2% increase above the previous year. Based on the new figures, staff recommends an increase in the previous projection for sales tax collections in FY 2007-08. The proposed adjustment will result in an estimated additional \$220,749 in sales tax collection next year.

City Manager Bowers continued by stating that during the budget presentation on May 7, 2007, the City Council requested information concerning the indirect costs used to calculate total refuse collections costs. The information was distributed to the City Council and reflected several different components of the total \$334,000 of indirect costs. Since some of the overhead cost components were based on projections, staff recommends that the amount of overhead expenses be lowered from \$334,000 to \$168,819, which represents the actual costs of lease purchase payments that will be made during FY 2007-08 for previously purchased refuse collection vehicles. By reducing the amount of overhead costs, staff recommends that the refuse fees for FY 2007-08 be established as \$9.26 per month for curbside and \$19.67 per month for backyard service, a reduction from the previously recommended \$9.60 and \$20.40 respectively. Under the originally proposed fees, there would be revenues in the amount of \$4,733,619 for refuse, and with the suggested change, it would be \$4,568,438, a reduction of \$165,181. There will be \$220,749 additional revenue from the sales tax adjustment, leaving a difference of \$55,568. With the additional sales tax, the City could further reduce the refuse fees to \$9.15 for curbside and \$19.45 for backyard, if it chooses to do so.

City Manager Bowers noted that the Council had approved the Council approve the false alarm permit fee, which would generate an estimated \$45,000 in revenue. The penalty could generate \$23,000. He recommended that the FY 2007-08 Financial Plan be amended to include \$6,000 for the Greenville Aquatics and Fitness Center to cover the City contribution as a result of raising the rate for employee families from \$10 to \$13 per month, \$68,000 for false alarm revenues in the Police Department, and a \$25,000 expenditure for Sheppard Memorial Library. The Financial Plan that was approved by Council in June 2006 included four new positions—Financial Analyst, MWBE Coordinator, and two bus drivers. During the May 7, 2007 budget presentation, three additional positions were included in the FY 2007-08 budget—Server/Security Analyst, Database Administrator, and Community Liaison He proposed making an adjustment in the Community Development Department to change one Public Nuisance Officer to a Code Enforcement Officer for flexibility. The Plan includes a three percent salary

adjustment and a \$5 per pay period increase in contribution to the 401(K). State law requires that a public hearing be held on the budget. The City budget ordinance includes the budgets for the City, Sheppard Memorial Library, and the Convention and Visitors Authority. The proposed General Fund budget is over \$65 million; Sheppard Memorial Library is \$2.2 million; and the Convention and Visitors Authority budget is \$675,000. The \$234 million Greenville Utilities Commission budget is a separate ordinance.

City Manager Bowers suggested that the following projects be carried over from FY 2006-07 to FY 2007-08—Master Plan for Recreation and Parks (\$50,000), River Park North (\$38,955), Police/Fire-Rescue Headquarters Expansion (\$75,000), Firing Range (\$200,000), and Railroad Crossing Signal (\$50,150). He encouraged the Council to ask questions about the Greenville Utilities Commission, Sheppard Memorial Library and Convention and Visitors Authority budgets of the directors of those entities, who are all present. The final action is scheduled for June 14.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

After a question and answer period, Mayor Parrott suggested that direction be given to the City Manager regarding the refuse fee and other suggested changes to the FY 2007-08 Financial Plan so that an ordinance can be prepared for consideration on Thursday, June 14.

Motion was made by Council Member Spell and seconded by Council Member Little to set the refuse fee at \$9.15 for frontyard service and \$19.45 for backyard service. Motion carried unanimously.

REVIEW OF JUNE 14, 2007 CITY COUNCIL AGENDA

The appointments to boards and commissions were reviewed. City Manager Bowers informed the Council that the Forbes rezoning request has been continued two times and has been changed to R6S. A protest petition has been submitted for the request.

On the request to close a portion of Washington Street, motion was made by Council Member Spell and seconded by Mayor Pro-Tem Council to continue the item until August to allow time for one or two public meetings to discuss the plan. Motion failed with a 2:4 vote. Mayor Pro-Tem Council and Council Member Spell voted in favor of the motion. Council Members Dunn, Glover, Craft and Little voted in opposition.

The Council did a cursory review of the items on the June 14, 2007 City Council Meeting agenda and reviewed the appointments to Boards and Commissions.

COMMENTS FROM MAYOR AND CITY COUNCIL

The Council Members expressed condolences to the family of former Mayor Nancy Jenkins, who passed away this past weekend.

Council Member Dunn stated that now that Greenville is a Preserve America City, it will be eligible to seek some grants. She complimented and thanked the Police Chief for the role he is going to play for 160 youngsters in the Summer Significance Academy.

Council Member Glover stated that she had a great conference in Lafayette and brought back information to share with the Council. The Committee prepared resolutions to give to the National League of Cities regarding human development, which consists of healthcare and schools. There will be one more meeting, and then they will present the resolution to the National League of Cities. She is going to try to get the President of the National League of Cities to come to Greenville, which will make a big statement.

Council Member Craft congratulated the winners of the Drew Steele/Skip Holtz Golf Tournament, which raised well over \$300,000, netting between \$250,000 and \$275,000 to benefit special populations. He encouraged everyone to come out Saturday at 10:00 at Elm Street Park for the dedication and ribbon cutting for the Sarah Vaughn Field of Dreams. A video was shown of special kids that are a part of the Challenger teams. Council Member Craft concluded by stating that Greenville has pulled together with something extra special for special populations in Greenville.

CITY MANAGER'S REPORT

City Manager Bowers reminded the Council of the Police Academy Graduation on June 12 for the largest class ever.

CLOSED SESSION

Motion was made by Council Member Little and seconded by Council Member Craft to go into closed session to prevent the disclosure of information that is privileged or confidential pursuant to the law of this State or of the United States, or not considered a public record within the meaning of Chapter 132 of the General Statutes, said law rendering the information as privileged or confidential being the Open Meetings Law and to establish or to instruct the public body's staff or negotiating agents concerning the position to be taken by or on behalf of the public body in negotiating the price and other material terms of a contract or proposed contract for the acquisition of real property by purchase, option, exchange, or lease. Motion carried unanimously.

RETURN TO OPEN SESSION

Motion was made by Council Member Little and seconded by Council Member Dunn to return to open session. Motion carried unanimously.

ADJOURN

Motion was made by Council Member Craft and seconded by Council Member Glover to adjourn the meeting at $8:00~\rm p.m.$ Motion carried unanimously.

Respectfully submitted,

Wanda T. Elks, MMC City Clerk

MINUTES PROPOSED FOR ADOPTION BY CITY COUNCIL

Greenville, NC June 14, 2007

The Greenville City Council met in a regular meeting on the above date at 7:00 PM in the City Council Chambers, third floor of City Hall, with Mayor Robert D. Parrott presiding. The meeting was called to order, followed by the invocation by Mayor Parrott. The presentation of colors was done by the Fire/Rescue Department Color Guard in recognition of Flag Day, followed by the pledge of allegiance to the flag. The following were present.

Mayor Robert D. Parrott
Mayor Pro-Tem Mildred A. Council
Council Member Ray Craft
Council Member Pat Dunn
Council Member Rose H. Glover
Council Member Chip Little
Council Member Larry Spell
Wayne Bowers, City Manager
Wanda T. Elks, City Clerk
David A. Holec, City Attorney

APPROVAL OF AGENDA

Motion was made by Mayor Pro-Tem Council and seconded by Council Member Spell to approve the agenda as presented. Motion carried unanimously.

APPOINTMENTS TO BOARDS AND COMMISSIONS

Affordable Housing Loan Committee

Council Member Glover asked that the appointments to the Affordable Housing Loan Committee be continued until August 2007 to allow time for getting more applicants from her district.

Board of Adjustment

Motion was made by Council Member Spell and seconded by Mayor Pro-Tem Council to reappoint Ann Bellis to a second three year term expiring June 2010, and to reappoint Charles Ewen and Charles Ward to first three-year terms expiring June 2010. Motion carried unanimously.

Community Appearance Commission

Motion was made by Council Member Dunn and seconded by Council Member Little to appoint Evon Zell to replace Jackie Wyman, who resigned, to fill an unexpired term that expires July 2008; to appoint Perry Kachroo to replace Edna Atkinson, who did not wish to be reappointed,

for a first term expiring April 2010; to appoint Jane Cartwright to replace Brenda Ernst, who resigned, to fill an unexpired term that expires April 2009; to reappoint Jeffrey Marshall to a second term to expire July 2010, and to reappoint Kishen Rao to a first term to expire July 2010. Motion carried unanimously.

Greenville Utilities Commission

Motion was made by Council Member Little and seconded by Council Member Dunn to reappoint Lester Brown to a second term to expire June 2010, and to continue the appointments to replace J. Bryant Kitrell and Erma Taylor who are ineligible for reappointment. Motion carried unanimously.

Pitt-Greenville Airport Authority

Motion was made by Council Member Craft and seconded by Council Member Dunn to reappoint Dennis Biggs to a second four-year term to expire July 2011. Motion carried unanimously.

Pitt-Greenville Convention and Visitors Authority

Motion was made by Council Member Spell and seconded by Council Member Craft to reappoint Tonyia Fulghum and James Streeter to a second term to expire July 2010; to continue the appointment to replace Angel Savage who did not meet attendance requirements; and to appoint John Van Coutren to a first term to expire July 2010. Motion carried unanimously.

Public Transportation and Parking Commission

Mayor Pro-Tem Council asked that the appointment to the Public Transportation and Parking Commission be continued until August 2007.

Recreation and Parks Commission

Motion was made by Council Member Little and seconded by Council Member Craft to reappoint James Bond, Gary Hassell and Wilson McDowell to a second term to expire June 2010; and to continue the replacement for Lillian Outterbridge. Motion carried unanimously.

ORDINANCE REQUESTED BY THERALDINE H. FORBES TO REZONE PROPERTY LOCATED NORTH OF FORLINES ROAD, DIRECTLY EAST OF SOUTH CENTRAL HIGH SCHOOL, SOUTH OF SWIFT CREEK SWAMP, AND WEST OF REEDY BRANCH ROAD FROM RA20 TO R6S - ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Theraldine H. Forbes to rezone 21.24 acres located north of Forlines Road, directly east of South Central High School, south of Swift Creek Swamp, and 2400+ feet west of Reedy Branch Road, from RA20 to R6S. At its March 20, 2007 meeting, the Planning and Zoning Commission voted to recommend approval of the request.

Ms. Chantae Gooby, Planner, explained the request and informed the Council that this request has been amended twice. The request being considered tonight is for single-family zoning. The property is located in Voting District 5. The protest petition that has been filed represents 68% of the property around it.

Upon being asked if connectivity would be required between this property and adjacent properties, Ms. Gooby replied that it would not be required; however, there would be nothing to prohibit it.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Mike Baldwin, representing Ms. Theraldine Forbes (who has the land under contract with the developer), stated that this request has been diluted on two occasions, beginning with R6A, which was approved by the Planning and Zoning Commission. It was continued at the City Council level and made R6A with a residential overlay with duplex-only development. Based on neighborhood opposition, it was then changed to R6S. The petitioner wasn't allowed to bring it to the Council last month. Fifteen letters were sent to adjoining property owners after it was decided to change the request to R6S, asking the property owners to contact him if they had any questions. The letter indicated that it would be for single-family houses only, no duplexes. He received one phone call and met with that resident. Even though they did not agree, they did discuss it. The proposed request is in compliance with the Land Use Plan and is compatible with surrounding zoning patterns and existing and future land uses. There are projected to be 140 increased trips per day, and the road is only at 45% of its designated average daily trips. There is some peak level traffic at Forlines and Reedy Branch Roads at school time; however, it flows freely at the stoplight. The impact on drainage will be positive, as the drainage problems will be alleviated by the developer. Because of the request being changed several times, this is a very modest request that he hopes the neighborhood can support. The Planning and Zoning Commission did recommend approval when the request was for a higher density.

Ms. Kathy Marsh stated that the notification states that the petitioner must present compelling evidence to justify the need for the proposed rezoning, and the burden of proof is on the petitioner to show that it is necessary. There are five areas to be considered. The first is that it fits the Comprehensive Plan, which is a tool. Although the request does meet the 2004 Comprehensive Plan, South Central High School and Creekside Elementary were apparently not considered, since they were not shown on the map sent to residents in the area. South Central High School opened in August 2002, and Creekside Elementary School opened in August 2005. Also, there seems to be a proposal for the Southwest Bypass exit to be on Forlines Road. Therefore, it seems that the Comprehensive Plan for the Forlines Road area is inadequate and obsolete, as it doesn't take into consideration what is happening there now. The request also does not meet the compatibility with surrounding area criteria, as R6S is not compatible with the Forlines Road area. The smallest lot size of the signers of the protest petition is 2/3 of an acre, and 6000 square foot lot homes do not mesh with this. The larger surrounding area is full of R6S houses, and more are not needed as there are 25 units for rent or sale. The criteria that it must fit in with current and future uses in the area has not been met, as placing small lot homes next to a high school and an already unsafe traffic pattern places the school and neighborhood at a No evidence has been presented that medium-density houses benefits the

neighborhood or the schools. Since Pitt County Schools owns property next to South Central, there is reason to believe that a third school may be added on Forlines Road. The criteria regarding the impact on streets and thoroughfares have not been met. According to the City's traffic count, the additional traffic generated by medium-density housing would not place an undue burden on Forlines Road. The traffic count described by the City in no way represents what is going on on Forlines Road. Their count was taken directly in front of the property to be rezoned, which did not count many of the vehicles going back and forth on Forlines Road to and from the schools. Current traffic counters were not placed on the roads, even though they were requested by the residents. Traffic on Forlines Road is extremely congested and dangerous during rush hour in the morning and afternoon. Adding school traffic to this is horrendous. Sometimes the traffic backs up 1/2 mile during rush hour, with up to 50 cars that are not moving smoothly. The four way stops all have backups, and traffic backs up beyond the turn lanes. These traffic problems force teenagers to risk their lives getting to and from school. With the additional traffic from the Southwest Bypass and a third school, the traffic count presented is absolutely meaningless. The least amount of traffic will be generated with RA-20 zoning. Ms. Marsh concluded by stating that this rezoning, if approved, will impact the quality of life for the people in the area. The adjoining property owners who signed the protest petition have lived there from 20 to 51 years. In addition to those petitioners, other Pitt County residents signed a petition against the rezoning. The Pitt County Board of Elections also submitted a letter in opposition to the City, as did the incoming principal of South Central High School, the current administration of Creekside Elementary School and the incoming PTA officers from both schools. No compelling evidence has been presented to support this rezoning request. This is a situation where there is a large diverse group of people in favor of keeping the zoning intact. The only one that makes sense is one that impacts traffic and the two schools the least, which is RA-20.

There being no further comments, the public hearing was closed.

Upon being asked for information on the traffic count, Mr. David Brown, City Engineer, responded that with the original request, there was a projected net increase of 300 trips based on the anticipated traffic on the estimated uses; and the amended request was for 190 trips. Looking at the size of the property and the amount of units that were capable of being produced, the standard traffic engineering principles were applied. The distribution is how they think the trips would be split, and they anticipate that the majority would go down Forlines Road. The average daily traffic volume was generated based on 2005 counts with an application of a three percent per year growth rate, as the North Carolina Department of Transportation did not have any counts. Those 2005 count was taken near Reedy Branch Road and near Frog Level Road. The count recently done was 6100 vehicles per day, so 5800 was close. The high school was in place at the time; however, the elementary school was just beginning to be constructed.

Upon being asked about the projected increase if this property was developed as RA-20, Mr. Brown replied that based on the parcel size, it would probably be 480 instead of 620.

Upon being asked about the chance of getting a stoplight at Reedy Branch Road and Forlines Road, Mr. Brown stated that has been discussed with the Department of Transportation, which does not recommend a signal at this time. Both Reedy Branch Road and Forlines Road are Statemaintained.

Council Member Little stated that Pitt County Schools sent a letter in opposition to the multifamily zoning request. In the letter, it was stated that the Board would support zoning for singlefamily dwellings. Prior to the last meeting, he went and sat in the area, and the longest a car had to wait at the intersection was three and a half minutes. Even though he sympathizes with the position of the property owners, there are similar issues at other schools. This request is for only a small number of additional homes.

Ms. Gooby stated that there could only be 20 additional houses with R6S and they will be in the same price range as comparable homes in the area.

Council Member Little expressed that he felt this was a reasonable request.

Council Member Craft stated that he received a letter from the School Administrator who said he wanted the zoning to stay in place. Once the Administrator saw the amended request, the administrator indicated that he was okay with the request. He wanted single-family development, as did the School Board. The traffic count is at less than fifty percent. There are traffic problems around other schools. The petitioner has changed the request and down-zoned twice.

Motion was made by Council Member Craft and seconded by Council Member Glover to adopt the ordinance rezoning 21.24 acres located north of Forlines Road, directly east of South Central High School, south of Swift Creek Swamp, and 2400+ feet west of Reedy Branch Road, from RA20 to R6S. Motion carried unanimously. (Ordinance No. 07-68)

Council Member Dunn stated that the City is going to have to take a look at that area. She asked that staff get with the School Board and Department of Transportation to address some of the concerns.

Mayor Parrott asked that staff work toward trying to get a stoplight there for when school is taking in.

ORDINANCE REQUESTED BY CAROLINA DEVELOPMENT AND CONSTRUCTION, LLC, TO AMEND THE FUTURE LAND USE PLAN MAP FOR THE AREA DESCRIBED AS BEING LOCATED ALONG THE EASTERN RIGHT-OF-WAY OF EVANS STREET, EXTENDING FROM THE WNCT-TV STATION SOUTHERN PROPERTY BOUNDARY LINE TO SOUTH OF PINEWOOD ROAD, AND INCLUDING THOSE LOTS FRONTING EVANS STREET FROM A "MEDIUM DENSITY RESIDENTIAL" CATEGORY TO AN "OFFICE/INSTITUTIONAL/MULTI-FAMILY" CATEGORY - DENIED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Carolina Development and Construction, LLC, to amend the Future Land Use Plan Map for the area described as being located along the eastern right-of-way of Evans Street, extending from the WNCT-TV Station southern property boundary line to 150 feet south of Pinewood Road, and including those lots fronting Evans Street, containing approximately 1.7± acres, from a "Medium Density Residential" category to an "Office/Institutional/Multi-family"

category. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to not recommend approval of the request.

Mr. Harry Hamilton, Chief Planner, explained this request and delineated the property on a map. He stated that the property is located in Voting District #5. There would be a net increase of 20 trips. Entrances to the neighborhood were left residential by design to protect the entrances to the neighborhood, and the Comprehensive Plan Committee did not recommend 0&I zoning at those locations. Staff recommends no change.

Council Member Dunn expressed concern about the pattern of having a request for a Land Use Plan amendment and then a rezoning request on the same property. Those issues need to be separated.

Council Member Spell concurred with her concern, expressing that the spirit of the Land Use Plan is to change the property all at one time.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Alton Wadford, who lives at the corner of Pinewood Road and Evans Street, stated that there are five entrances to the three neighborhoods (Pinewood, Lynndale and Bedford). Pinewood connects with Lynndale on one side and Bedford on the other, and there is commercial property on both sides. A strip mall backs up to single-family houses, and there seems to be no problem with that. A precedent has been set by allowing commercial property at the edge of a neighborhood. It is only fair to the buyer and seller for it to be rezoned in a way they see fit. This is similar to having the Bojangles located at the entrance to Westhaven. Any change made to the appearance would be pleasing to the eye and the residents will be proud of the changes.

Ms. Kim Langley expressed empathy for the neighbors and stated that she understood their concerns. This area has changed tremendously since the property was bought 30 years ago, as Evans Street then had two lanes and was outside of the City. The building proposed to be built there would serve as a buffer for the four-lane highway and would block noise.

Ms. Judy Farmer stated that this property is most suitable for commercial use. She stated that she thought it would be difficult to sell it for a single-family dwelling. This is not without precedent, as it has happened up and down that area.

Ms. Beth West stated that she is in favor of the request. The corridor is slated to alleviate congestion, and it stands the reason that this small parcel should be for office use. The person who wants to purchase it is a developer, who wants to remove homes and build something to face Evans Street. It will be a buffer. With the proposed four-lane highway, a large portion of it may be taken. She proposed that it be made available for a building that will be pleasing to the City.

Ms. Joanne Rider stated that she lives immediately adjacent to this property and that she purchased her home eight or nine years ago. All of the neighborhoods are opposed, specifically Lynndale. The adjoining property owners have filed a protest petition. They would like for this property to remain as single-family. Growth that infringes on the neighborhoods is not right.

Changes have been made to protect neighborhoods as requested by the Neighborhood Task Force, and she asks that those positions be upheld. There is an abundance of office space for rent in Greenville. Changing the zoning in this area will increase the flooding and traffic.

Ms. Diane Kulik, President of Lynndale Homeowners Association, and a member of the Community Appearance Commission, stated that she was here to represent the Lynndale homeowners. The Neighborhood Council met at her house and discussed the possible rezoning, and the members indicated that they do not wish to see businesses backed up to houses. She has submitted a copy of the petition she presented at the Planning and Zoning Commission that was signed by all Neighborhood Council members stating that they are against the rezoning. She questioned the purpose of asking citizens of Greenville to meet, study and determine the proposed zoning of areas when the Plan can be so easily changed. The job of the City government staff and commissions is to provide the best quality of life for each of the residents. This rezoning will affect the quality of life for the people next door and down street, as there will be increased traffic and lights. The property values will drop. There is a more than adequate amount of leased properties in Greenville. Residents want to come home to a quiet tranquil neighborhood, and having a business there will not help. She asked the Council to deny the request.

There being no further comments, the public hearing was closed.

Motion was made by Council Member Little and seconded by Council Member Craft to deny the request to amend the Future Land Use Plan Map for the area described as being located along the eastern right-of-way of Evans Street, extending from the WNCT-TV Station southern property boundary line to 150 feet south of Pinewood Road, and including those lots fronting Evans Street, containing approximately 1.7± acres, from a "Medium Density Residential" category to an "Office/Institutional/Multi-family" category. Motion carried unanimously.

ORDINANCE REQUESTED BY CAROLINA DEVELOPMENT AND CONSTRUCTION, LLC, TO REZONE THE NORTHEAST CORNER OF THE INTERSECTION OF EVANS STREET AND PINEWOOD ROAD, FROM R9S TO O – DENIED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Carolina Development and Construction, LLC to rezone 0.74± acres located at the northeast corner of the intersection of Evans Street and Pinewood Road, from R9S to O. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to not recommend approval of the request.

Mayor Parrott asked if the petitioner would like to withdraw since the request to amend the future land use map was denied. The petitioner was not present, and an unidentified citizen stated that they would probably want to have it heard tonight.

Mr. Harry Hamilton, Chief Planner, stated that entrances into neighborhoods are recommended for residential use. The proposed zoning could yield an increase of 20 trips per day, as it will only allow office development, and the request is not in compliance with the Comprehensive

Plan. Staff recommends denial of the request. There was a protest petition signed by over 60% of the property owners, so a supermajority vote is required to pass the ordinance.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made to deny the request to rezone $0.74\pm$ acres located at the northeast corner of the intersection of Evans Street and Pinewood Road, from R9S to O and to make a finding and determination that the denial of the rezoning request is consistent with the adopted Comprehensive Plan and that the denial of the rezoning request is reasonable and in the public interest due to the denial being consistent with the comprehensive plan and, as a result, the denial furthers the goals and objectives of the Comprehensive Plan. Motion carried unanimously.

ORDINANCE REQUESTED BY LEWIS LAND DEVELOPMENT, LLC TO AMEND THE FUTURE LAND USE PLAN MAP FOR THE AREA LOCATED ALONG THE SOUTHERN RIGHT-OF-WAY OF EAST FIRE TOWER ROAD, WEST OF FORK SWAMP CANAL, EAST OF FIRE TOWER CROSSING SHOPPING CENTER AND SOUTH OF QUARTERPATH VILLAGE SUBDIVISION, FROM AN OFFICE/INSTITUTIONAL/MULTI-FAMILY" AND HIGH-DENSITY RESIDENTIAL" CATEGORY TO A "COMMERCIAL" CATEGORY – ADOPTED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Lewis Land Development, LLC to amend the Future Land Use Plan Map for the area located along the southern right-of-way of East Fire Tower Road, west of Fork Swamp Canal, east of Fire Tower Crossing Shopping Center and south of Quarterpath Village Subdivision, containing approximately 20 acres, from an "Office/Institutional/Multi-family" and "High-Density Residential" category to a "Commercial" category". The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to recommend approval of the request.

Mr. Harry Hamilton, Chief Planner, delineated the property on a map and explained the request. The property is located in Voting District 5 and is south of Fire Tower Road, being a portion of the former Evans Mobile Home Park. A majority of the property is currently vacant. There are several uses that front on Fire Tower Road. The North Carolina Forestry Service is included in this area along with the former Park Side Convenience Store. Fire Tower Road is considered a residential corridor between Old Tar Road and Corey Road. This property directly abuts the existing Fire Tower Center to the west, which is a neighborhood focus area as shown in the Land Use Plan. Changing the Land Use Plan as requested would change it to an intermediate focus area, and it is to be spaced further apart than can be achieved. There are some floodplain areas close by, such as Fork Swamp Canal to the west. The street system access is limited to Fire Tower Road. Covengton Downes is a commercial focus area transitioning along Fire Tower Road, which is currently zoned for high density residential. A large percentage of the area is within Winterville's jurisdiction. There is also another large regional commercial focus area toward Memorial Drive. The properties between Old Tar Road extending east along Fire Tower Road and those heading back to Greenville have all been developed and zoned in accordance with the recommendations and guidelines in the current Comprehensive Plan. The development

that has taken place in these areas centers around commercial, which is preferred to stripping out major roads like Greenville Boulevard and Memorial Drive.

Mr. Hamilton continued by stating that there will be signalized intersection traffic in front of Greystone Mobile Home Park. All the traffic will be funneled to Fire Tower Road, creating an additional 500 trips, which changes the Land Use Plan. It would be anticipated that the areas to the south would be developed for high-density multi-family. This is a significant linear expansion of a neighborhood focus area along Fire Tower Road. There have been some subsequent rezoning requests taking place in the area to the south. This site is dependent on Fire Tower Road access, and there is no possibility in the future of any of the roads being extended into this area. Pedestrian access from the neighborhood to the north of Fire Tower Road is impractical. If the rezoning is approved, there could be a net increase of 6,580 trips since all traffic will be funneled out to Fire Tower Road. Additional trips will impact or negate the street improvement project. The commercial area could be comparable to the Best Buy Center. The Fire Tower Road corridor is not built out; there is other land available for rezoning. This is not the last available property, as there are significant properties at the corner of Old Tar Road and Fire Tower Road. In staff's opinion, this request is a significant deviation in the Comprehensive Plan and it is not necessary. Staff does not recommend a change in the Land Use Plan at this time.

Council Member Spell expressed concern about the possibility of this setting a precedent and having a development pattern similar to Greenville Boulevard.

Mr. Hamilton stated that it is not possible to have it happen to that degree. There are, however, properties available on this corridor that can be rezoned to commercial.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Durk Tyson, representing Lewis Land development, stated that this is redevelopment of the former Evans Mobile Home Park. The Land Use Plan shows a neighborhood focus area on Fire Tower Road, and the petitioner would like to expand the community focus area. Within ½ mile radius of the property, there are 1300 homes, and there are 3500 homes within a one mile radius. A community shopping area would serve those residents. The petitioners are not looking for general commercial zoning; they are looking for neighborhood commercial. The Department of Transportation is currently modifying Fire Tower Road, and access would be through a signalized intersection at its intersection to the former mobile home park. It will be a divided median facility when the widening is completed similar to Hooker Road that provides access to the convention center. The development will be subject to City and Department of Transportation regulations. There is ¼ mile of frontage and there would be a limit of three driveways. In conjunction with the development plan review, it is anticipated that there will be additional turn lanes to accommodate traffic.

Mr. Ronald Stevens, a professional engineer, stated that the maximum build out with the current zoning is 7800 cars per day. If the Land Use Plan is amended and the rezoning approved as commercial, it is anticipated that the commercial as well as the 24 acre tract behind it could generate 11,000 trips per day. If the rezoning were to occur to Neighborhood, that commercial and residential piece would become a mixed use development. With that kind of development,

even without interconnectivity, those trips will never reach Fire Tower Road, so there would not be such a big increase on Fire Tower Road. If commercial is on the front and residential behind it, they have different traffic patterns. The study looked at if the property remained high density residential and both properties were built out, it would actually have more traffic in the morning and less later in the day. That increase in traffic is not detrimental to roadways. During the process, pedestrian access could take place and there could be signalized crosswalks to surrounding neighborhoods.

Mr. Jim Hopf, on behalf of Lewis Land Development, stated that a reason to change the land use map is because the City is changing. The community is constantly evolving, and the plans need to evolve and change with the community. This area has changed, Fire Tower Road is being widened, and there is a significant area of single-family and multi-family development surrounding the property. The requested amendment takes into account the changes and reflects the changes and makes the way for the use of property that will complement the character around it. The rezoning request being made proposes a neighborhood commercial area, which is the most restrictive classification that would allow a variety of uses that would facilitate and complement the property around it.

Dr. Mark Hayes, owner of Fire Tower Animal Clinic, stated that change is inevitable; however, he feels that the existing plan is sufficient. He checked out this piece of property and was amazed at its size. He likes the current character of that section of Fire Tower Road, as it is not overly commercialized. The current neighborhood center fits the residential area around them, and he is not in favor of adding more commercial property. Covengton Downes is down the street, and there is a great deal of commercial property there. He would prefer that this section not be overly commercial.

There being no further comments, the public hearing was closed.

Upon being asked if the commercial property down from Paramore Farms was added, how much it would be, Mr. Hamilton stated that there are 24 acres almost all developed at Tar Road and Evans Street, and 107 acres east extending from Covengton Downes, with 59 of those vacant. There is a very large commercial tract at Fire Tower Road and Memorial Drive. There is a significant amount of commercial property, with over 100 acres between Memorial Drive and Arlington Boulevard that has direct access onto Fire Tower Road. There is also commercial property on Evans Street. It is not necessary, from a planning standpoint, to have the intensive commercial property on Fire Tower Road.

Upon being asked if it could be multi-family, Mr. Hamilton replied that traffic patterns are different for residential and commercial properties. The total traffic generated from commercial and the remaining residential is more than what would be generated just from residential.

Council Member Little stated that this is a significant change in the Land Use Plan. When Council talked about the Fire Tower Road expansion project, this was deemed a residential corridor. Even though he is not opposed to commercial development, there has to be a change in the physical development pattern to warrant the change. The Council has worked hard to maintain the integrity, and this is too much of a change.

Motion was made by Council Member Little and seconded by Council Member Spell to deny the request. Motion failed with a 3:4 vote. Council Members Little, Spell and Dunn voted in favor of the motion to deny the request to amend the Future Land Use Plan Map for the area located along the southern right-of-way of East Fire Tower Road, west of Fork Swamp Canal, east of Fire Tower Crossing Shopping Center and south of Quarterpath Village Subdivision, containing approximately 20 acres, from an "Office/Institutional/Multi-family" and "High-Density Residential" category to a "Commercial" category". Mayor Pro-Tem Council and Council Members Craft and Glover voted in opposition. Mayor Parrott broke the tie and voted in opposition to the motion to deny the request.

Motion was then made by Council Member Craft and seconded by Council Member Glover to adopt the ordinance requesting to amend the Future Land Use Plan Map for the area located along the southern right-of-way of East Fire Tower Road, west of Fork Swamp Canal, east of Fire Tower Crossing Shopping Center and south of Quarterpath Village Subdivision, containing approximately 20 acres, from an "Office/Institutional/Multi-family" and "High-Density Residential" category to a "Commercial" category". Motion carried with a 4:3 vote. Mayor Pro-Tem Council and Council Members Craft and Glover voted in favor of the motion. Council Members Little, Spell and Dunn voted in opposition. Mayor Parrott broke the tie and voted in favor of the motion to adopt the ordinance. (Ordinance No. 07-69)

ORDINANCE REQUESTED BY LEWIS LAND DEVELOPMENT, LLC TO REZONE PROPERTY ALONG THE SOUTHERN RIGHT-OF-WAY OF EAST FIRE TOWER ROAD, WEST OF WHITEBRIDGE APARTMENTS, EAST OF FIRE TOWER CROSSING SHOPPING CENTER, AND SOUTH OF QUARTERPATH VILLAGE SUBDIVISION, FROM R6MH TO CN - ADOPTED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Lewis Land Development, LLC, to rezone 24 acres located along the southern right-of-way of East Fire Tower Road, west of Whitebridge Apartments, east of Fire Tower Crossing Shopping Center, and south of Quarterpath Village Subdivision, from R6MH to CN. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to recommend approval of the request.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Jim Hopf echoed the comments made in the previous request and stated that he is in favor of the change. This will be a neighborhood commercial area to complement the area. It will provide services and retail centers to allow residents in the area to use the facility rather than to travel to other areas.

Dr. Mark Hayes stated that he is not sure why the City has a master plan that guides development if it is not followed by the City Council. He has served on the Planning and Zoning Commission. He stated that effectively the Council has changed one of the few residential corridors to a commercial corridor, which he opposes. This is a bad decision.

There being no further comments, the public hearing was closed.

Council Member Spell echoed some of the sentiments of Dr. Hayes. A great deal of time and effort was spent with this plan. To see the Council make such a significant change makes one wonder why one would spend time creating such a plan. There is no time for digestion with one item being on the agenda changing the plan, and the next item being a rezoning. This is a significant change, one that shouldn't be altered.

Council Member Dunn stated that what is changing in the area is a massive increase in housing development, which the Comprehensive Plan calls for. She doesn't think there is a shortage of commercial development in that area. The magnitude of this commercial property being requested is changing the character of Fire Tower Road.

Mayor Parrott stated that he supported the motion because all the property surrounding it is multi-family. If there isn't adequate commercial area there with 1000 people in the area, they will be able to shop without going to Fire Tower Road. A center adequate to serve those residents is needed. He doesn't see the amount of commercial development on Fire Tower Road that is on Greenville Boulevard.

Council Member Little stated that they have created an intermediate focus area in the middle of a residential development. When it was discussed, it was clear that this was a residential corridor. That is one reason the Department of Transportation didn't want to take the medians out of the road. The City Council has now changed the character of that area.

Council Member Glover stated that she can't see how it makes that great a difference. The Council is here to make decisions based on what it feels is right and fair.

Council Member Dunn expressed concern about the applicant asking for a rezoning right after a request to change the Land Use Plan. The process may be better served if that is done separately. Zoning requests have a different kind of intensity to them, and this is a matter of process. She would like to see the Council take that approach.

Motion was made by Council Member Craft and seconded by Council Member Glover to adopt the ordinance rezoning 24 acres located along the southern right-of-way of East Fire Tower Road, west of Whitebridge Apartments, east of Fire Tower Crossing Shopping Center, and south of Quarterpath Village Subdivision, from R6MH to CN. Motion carried with a 4:3 vote. Mayor Pro-Tem Council and Council Members Glover and Craft voted in favor of the motion. Council Members Dunn, Little and Spell voted in opposition. Mayor Parrott broke the tie by voting in favor of the motion. (Ordinance No. 07-70)

ORDINANCE REQUESTED BY WILLIAM E. DANSEY, JR. TO REZONE PROPERTY LOCATED AT THE SOUTHWEST CORNER OF THE INTERSECTION OF EAST FIRE TOWER AND BAYSWATER ROADS FROM OR TO CG – DENIED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by William E. Dansey, Jr., to rezone 1.85 acres located at the southwest corner of the

intersection of East Fire Tower and Bayswater Roads from OR to CG. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to recommend approval of the request.

Mr. Harry Hamilton, Chief Planner, delineated the property on a map and explained the request. He stated that staff recommends denial of the request based on the linear expansion along the road.

Upon being asked the zoning for Dudley's Grant, Mr. Hamilton responded that it is R-6.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Fred Mattox, speaking on behalf of Bill Dansey, stated that this entire area is in a state of transformation. Mr. Dansey is the owner of Fire Tower Shopping Center, which is full, and would like to incorporate this into the development. There will be a stoplight. He read a letter from Rocky Russell, the property owner to the west, stating that he is favor of the request. It is compatible with the shopping center already there. There is a need for additional commercial property because of the residential development.

There being no further comments, the public hearing was closed.

Council Member Little stated that Bayswater Drive comes in off of Fire Tower Road, and the current commercial zoning is on the east. There is transition after Bayswater Drive. The road is a natural barrier for the transitioning from OR to R6. There is more commercial that could be squared up. This request is not in compliance with the Comprehensive Plan.

Council Member Craft stated that this is the last of the 1.8 acres, and that will be the end of it. Mr. Dansey does not own the property behind this. The Homeowners Association doesn't have a problem with this request, which will finish Fire Tower Shoppes.

Motion was made by Council Member Craft and seconded by Mayor Pro-Tem Council to adopt the ordinance rezoning 1.85 acres located at the southwest corner of the intersection of East Fire Tower Road and Bayswater Drive from OR to CG. Motion failed with a 3:4 vote. Mayor Pro-Tem Council and Council Members Craft and Glover voted in favor of the motion. Council Members Dunn, Little and Spell voted in opposition. Mayor Parrott broke the tie by voting in opposition to the motion.

Motion was made by Council Member Spell and seconded by Council Member Little to deny the request to rezone 1.85 acres located at the southwest corner of the intersection of East Fire Tower Road and Bayswater Drive from OR to CG and to make a finding and determination that the denial of the rezoning request is consistent with the adopted Comprehensive Plan and that the denial of the rezoning request is reasonable and in the public interest due to the denial being consistent with the comprehensive plan and, as a result, the denial furthers the goals and objectives of the Comprehensive Plan. Motion carried with a 4:3 vote. Council Members Dunn, Little and Spell voted in favor of the motion. Mayor Pro-Tem Council and Council Members Craft and Glover voted in opposition. Mayor Parrott broke the tie by voting in favor of the motion to deny the request.

ORDINANCE REQUESTED BY MANDY TASHA AND ENZI ABDU TO REZONE PROPERTY LOCATED AT THE SOUTHWEST CORNER OF THE INTERSECTION OF DICKINSON AVENUE AND SOUTH SKINNER STREET FROM IU TO CDF – ADOPTED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Mandy Tasha and Enzi Abdu, to rezone 2.043 acres located at the southwest corner of the intersection of Dickinson Avenue and South Skinner Street, from IU to CDF. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to recommend approval the request.

Ms. Chantae Gooby, Planner, explained the request and delineated the property on a map. She stated that this request would result in a decrease in traffic. The request is in compliance with the Comprehensive Plan.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Dunn and seconded by Council Member Glover to adopt the ordinance rezoning 2.043 acres located at the southwest corner of the intersection of Dickinson Avenue and South Skinner Street from I to CDF. Motion carried unanimously. (Ordinance No. 07-71)

ORDINANCE REQUESTED BY OWEN BURNEY TO REZONE PROPERTY LOCATED BETWEEN NORTH MEMORIAL DRIVE AND THE SEABOARD COASTLINE RAILROAD, SOUTH OF STATON MILL ROAD AND NORTH OF MOORE ROAD FROM RA20 AND RR TO OR - ADOPTED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by Owen Burney, to rezone 12.39± acres located between North Memorial Drive and the Seaboard Coastline Railroad, 2,070± feet south of Staton Mill Road, and 460± feet north of Moore Road from RA20 and RR to OR. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to recommend approval of the request.

Ms. Chantae Gooby, Planner, explained the request and delineated the property on a map. She stated that this request is being done in conjunction with a voluntary annexation. It could result in a net increase of 740 trips. The request is in compliance with the Comprehensive Plan.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Owen Burney asked the Council to vote favorably on this request.

There being no further comments, the public hearing was closed.

Motion was made by Mayor Pro-Tem Council and seconded by Council Member Dunn to adopt the ordinance requesting to rezone 12.39± acres located between North Memorial Drive and the

Seaboard Coastline Railroad, 2,070± feet south of Staton Mill Road, and 460± feet north of Moore Road from RA20 and RR to OR. Motion carried unanimously. (Ordinance No. 07-72)

ORDINANCE REQUESTED BY V-SLEW, LLC, TO REZONE PROPERTY LOCATED ALONG THE NORTHERN RIGHT-OF-WAY OF NC HIGHWAY 33 EAST, EAST OF THE INTERSECTION OF NC HIGHWAY 33 EAST AND PORTERTOWN ROAD, AND WEST OF THE INTERSECTION OF NC HIGHWAY 33 EAST AND L. T. HARDEE ROAD, FROM RA20 AND RR TO OR, R6A, RA20 AND O - ADOPTED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by V-SLEW, LLC, to rezone 101.179 acres located along the northern right-of-way of NC Highway 33 East, 820± feet east of the intersection of NC Highway 33 East and Portertown Road, and 1,350± feet west of the intersection of NC Highway 33 East and L.T. Hardee Road, from RA20 and RR to OR, R6A, RA20, and O. The Planning and Zoning Commission, at its May 15, 2007 meeting, the Planning and Zoning Commission voted to recommend approval the request.

Ms. Chantae Gooby, Planner, explained the request and delineated the property on a map. This request is being done in conjunction with the voluntary annexation and is similar to the request that was denied in February. It is located in Voting District 5, between Tenth Street and the Tar River, east of Riverhills. The property is very deep, being over one mile long, and is vacant. Part of the property is in the City's jurisdiction and part is in the County's. About ½ of the property in the back is in the floodway. Tenth Street is considered a gateway corridor. This request could net an increase of 2170 trips per day, with the majority of those going west. This request is not in compliance with the Comprehensive Plan.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Baldwin stated that the petitioners have come up with an agreement with the synagogue. This property is deep and narrow, which is why staff is not in agreement. There have been meetings, and one of the issues is the expansion of the cemetery. The petitioners and he have met with city staff and looked at where the cemetery is and see it going to the river rather than to the east. In relationship to the compliance with the Comprehensive Plan, it calls for Office and Residential zoning long the frontage, which they could comply with. On the 1.3 acres next to the church, they would have office. The medium density property has been shrunk by 11 acres. Then there would be low density and very low density. This is one area where the road is designed and built before the growth gets there. Highway 33 is at about 30% of its design capacity. With respect to the compatibility with zoning patterns, there is park land to the west, the river to the north, a trailer park to the east, and a road, which will not be impacted. The development of this property will facilitate the installation of a pump station with an agreement with Greenville Utilities, the City and developers. This will open up more area. The developers will have to turn in construction drawings and will be sure the church is protected in that regard. He has been told that the concerns of the synagogue have been resolved.

Mr. Jim Hopf, attorney representing the petitioner, stated that there were some concerns raised by the synagogue the last time. An agreement has been worked out by the developers and owners of this property, and they have agreed to have Tract 4 as office, with a berm and landscape screening.

City Attorney Holec reminded the Council that they could not consider any private agreements, that the request is for a rezoning and all uses within the particular zone have to be considered. The Council cannot rely on a private agreement.

Mr. Hopf stated that there have been discussions and concerns have been worked out. One of the concerns of staff has to do with the cemetery; the second has to do with the depth of the property, which creates limitations. A mixed development is a reasonable use for this property.

Ms. Samantha Pilot, President of Bayt Shalom, stated that they are in the favor of the request. They have had a good working relationship with the petitioner and have come to an agreement.

There being no further comments, the public hearing was closed.

Mayor Parrott thanked the parties for working together on this matter.

Motion was made by Council Member Little and seconded by Mayor Pro-Tem Council to adopt the ordinance requesting to rezone 101.179 acres located along the northern right-of-way of NC Highway 33 East, 820± feet east of the intersection of NC Highway 33 East and Portertown Road, and 1,350± feet west of the intersection of NC Highway 33 East and L.T. Hardee Road, from RA20 and RR to OR, R6A, RA20, and O. Motion carried unanimously. (Ordinance No. 07-73)

ORDINANCE REQUESTED BY THE COMMUNITY DEVELOPMENT DEPARTMENT, TO AMEND DOWNTOWN COMMERCIAL DISTRICT TABLE OF USES TO INCLUDE A NEW USE ENTITLED "DORMITORY DEVELOPMENT" AS A SPECIAL USE - ADOPTED

City Manager Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider a request by the Community Development, to amend the Downtown Commercial district table of uses to include a new use entitled "dormitory development" as a special use. The Planning and Zoning Commission, at its May 15, 2007 meeting, voted to recommend approval the request.

Mr. Harry Hamilton, Chief Planner, stated that this request is consistent with the goals and objectives of the Land Use Plan and Comprehensive Plan. Staff recommends approval, as does the Redevelopment Commission and the Planning and Zoning Commission.

Upon concern being expressed about the ½ parking space required per bedroom, Mr. Hamilton responded that is very similar to what is required for multi-family developments. Most uses downtown don't require any parking.

Upon being asked if they could meet the requirement if they contracted with the City for parking, Mr. Hamilton responded that would be possible; however, they would have to have a lease for life of the project.

Upon being asked if the same rules would apply to a private dormitory as well as one constructed by East Carolina University, Mr. Hamilton responded that it would.

Upon being asked if there would be a prohibition for retail on the ground floor, Mr. Hamilton responded that it would not; however, there are areas in the center city where multi-family would not be appropriate, where commercial would be the primary use.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Stan Armstrong, representing the petitioner, stated that the ordinance change would make downtown student apartment development more feasible. By having the housing downtown, students will have a downtown living alternative. The City will benefit by having 24/7 downtown clientele

There being no further comments, the public hearing was closed.

Motion was made by Mayor Pro-Tem Council and seconded by Council Member Glover to adopt the ordinance to amend the Downtown Commercial district table of uses to include a new use entitled "Dormitory Development" as a special use. Motion carried unanimously. (Ordinance No. 07-74)

ORDINANCE ANNEXING BURNEY AND BURNEY CONSTRUCTION COMPANY, INC. LOCATED EAST OF NC HIGHWAY 11 AND NORTH OF PINEWOOD ESTATES - ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4, 2007 setting this time, date and place for a public hearing to consider a request by Burney and Burney Construction Co., Inc., to annex 15.77 acres located east of NC Highway 11 and north of Pinewood Estates. This is a contiguous annexation.

Mr. Mike Dail, Planner, delineated the property on a map and stated that the property is located in Voting District 1. The property is currently vacant and the proposed use is a 7,000 square foot office building. The current population is 0, and the anticipated population at full development is 0. This property is 4.7 miles from Fire Station No. 4.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Dunn and seconded by Council Member Glover to adopt the ordinance annexing 15.77 acres located east of NC Highway 11 and north of Pinewood Estates. Motion carried unanimously. (Ordinance No. 07-75)

ORDINANCE ANNEXING V-SLEW, LLC, PROPERTY LOCATED NORTH OF NC HIGHWAY 33 AND WEST OF ROLLING MEADOWS SUBDIVISION - ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4, 2007 setting this time, date and place for a public hearing to consider a

request by V-Slew, LLC to annex 67.389 acres located north of NC Highway 33 and west of Rolling Meadows Subdivision. This is a contiguous annexation.

Mr. Mike Dail, Planner, delineated the property on a map and stated that the property is located in Voting District 3. The property is currently vacant and the proposed use is for 120 single-family homes. The current population is 0, and the anticipated population at full development is 319, with 40 being minority. This property is 1.9 miles from Fire Station No. 6.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Glover and seconded by Council Member Dunn to adopt the ordinance annexing 67.389 acres located north of NC Highway 33 and west of Rolling Meadows Subdivision. Motion carried unanimously. (Ordinance No. 07-76)

ORDINANCE ANNEXING BRISTOLMOOR, SECTION 3, LOCATED WEST OF BRISTOLMOOR, SECTION 3, LOCATED WEST OF BRISTOLMOOR, SECTION 2, AND NORTH OF FORLINES ROAD - ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4, 2007 setting this time, date and place for a public hearing to consider a request by Bristolmoor, LLC to annex 9.219 acres located west of Bristolmoor, Section 2, and north of Forlines Road. This is a non-contiguous annexation.

Mr. Mike Dail, Planner, delineated the property on a map and stated that the property is located in Voting District 5. The property is currently vacant and the proposed use is for 31 single-family residential homes. The anticipated population at full development is 72, with 18 being minority. This property is 4.8 miles from Fire Station No. 5.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Glover and seconded by Mayor Pro-Tem Council to adopt the ordinance annexing 9.219 acres located west of Bristolmoor, Section 2, and north of Forlines Road. Motion carried unanimously. (Ordinance No. 07-77)

ORDINANCE ANNEXING LANGSTON FARMS, PHASE 9, LOCATED NORTH OF LANGSTON BOULEVARD AND SOUTH OF STONE WOOD DRIVE – ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4, 2007 setting this time, date and place for a public hearing to consider a request by William H. Clark and Gloria E. Clark to annex Langston Farms, Phase 9, containing 5.4732 acres located north of Langston Boulevard and south of Stone Wood Drive. This is a contiguous annexation.

Mr. Mike Dail, Planner, delineated the property on a map and stated that the property is located in Voting District 5. The property is currently vacant and the proposed use is for 18 single-family

residential dwellings. The anticipated population at full development is 42, with 10 being minority. This property is 2.5 miles from Fire Station No. 5.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Dunn and seconded by Mayor Pro-Tem Council to adopt the ordinance annexing Langston Farms, Phase 9, containing 5.4732 acres located north of Langston Boulevard and south of Stone Wood Drive. Motion carried unanimously. (Ordinance No. 07-78)

ORDINANCE ANNEXING WATERFORD COMMONS, LOCATED ON THE NORTHEAST CORNER OF THE INTERSECTION OF B'S BARBEQUE ROAD AND STANTONSBURG ROAD - ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4, 2007 setting this time, date and place for a public hearing to consider a request by Waterford Commons to annex Waterford Commons, containing 11.17 acres located on the northeast corner of the intersection of B's Barbeque Road and Stantonsburg Road. This is a contiguous annexation.

Mr. Mike Dail, Planner, delineated the property on a map and stated that the property is located in Voting District 1. The property is currently vacant and the proposed use is for a 50,000 square foot office development on 6 lots. The anticipated population at full development is 0. This property is 1.5 miles from Fire Station No. 2.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Craft and seconded by Council Member Little to adopt the ordinance annexing Waterford Commons, containing 11.17 acres located on the northeast corner of the intersection of B's Barbeque Road and Stantonsburg Road. Motion carried unanimously. (Ordinance No. 07-79)

RESOLUTION TO CLOSE A PORTION OF SOUTH WASHINGTON STREET TO DICKINSON AVENUE, A PORTION OF WEST SIXTH STREET FROM SOUTH WASHINGTON STREET TO EVANS STREET, AND DICKINSON AVENUE FROM SOUTH WASHINGTON STREET TO READE CIRCLE – CONTINUED TO AUGUST 6

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on May 14, 21, 28 and June 4, 2007 setting this time date and place for a public hearing to consider closing a portion of South Washington Street to Dickinson Avenue, a portion of West Sixth Street from South Washington Street to Evans Street, and Dickinson Avenue from South Washington Street to Reade Circle.

Mr. David Brown, City Engineer, stated that at the May 7, 2007 meeting, the City Council adopted a resolution of intent to close a portion of South Washington Street from a point

approximately 140.5 feet south of Martin Luther King, Jr. Drive to its intersection with Dickinson Avenue a distance of approximately 160 feet. The resolution also identified for closure a portion of West Sixth Street beginning at its intersection with South Washington Street to its intersection with Evans Street, a distance of approximately 305 feet and a portion of Dickinson Avenue from its intersection with Reade Circle to South Washington Street a distance of 361 feet. The resolution established June 14, 2007 as the public hearing date. In accordance with State Statute, the resolution of intent was advertised in The Daily Reflector on four consecutive weeks (May 14, 21 and 28 and June 4, 2007). Signs displaying the notice of a public hearing, the adopted resolution of intent, and a site map were posted on May 11, 2007 at prominent locations on each end of the street sections to be closed. The order to close the sections of South Washington Street, West Sixth Street, and Dickinson Avenue is contingent upon the following conditions and shall not become effective until both are met.

- The recordation of the final plat for the Sixth Street Relocation Project in accordance with the provisions of the Subdivision Regulations for Greenville, North Carolina, said final plat to include the dedication of the necessary street right-of-way for the relocated Sixth Street from its intersection with Reade Circle at Dickinson Avenue to Evans Street, the necessary utility easements to accomplish the relocation of utilities in accordance with the requirements of Section 14 of the Agreement dated April 12, 2007 between the City of Greenville and Jarvis Memorial United Methodist Church, and the ingress/egress easements in accordance with the requirements of Section 15 of the Agreement dated April 12, 2007, between the City of Greenville and Jarvis Memorial United Methodist Church.
- The completion and acceptance of all improvements associated with the final plat for the Sixth Street Relocation Project in accordance with the Subdivision Regulations for Greenville, said improvements to include, but not be limited to, the relocated Sixth Street from its intersection with Reade Circle at Dickinson Avenue to Evans Street.

With the construction of the relocated Sixth Street, the proposed closures of the sections of South Washington Street, West Sixth Street, and Dickinson Avenue are appropriate. The closures will result in changes in traffic patterns in the area.

City staff has reviewed the request and, based on input from all departments, there are no objections to the closing, subject to the conditions specified. With this proposal, there will be a shift in traffic, affecting 2000 to 2500 vehicles per day.

Mr. Tom Tysinger, Director of Public Works, stated that this is the least traveled street in the downtown area. Greene and Reade Streets, for example, carry about 6000 to 8000 vehicles per day. There were some questions about the impact on parking. The on-street parking that will be lost from Dickinson Avenue, Sixth Street, and Washington Street is 27, with 9 added on at South Washington Street adjacent to the Municipal Building and 4 added on Evans Street, for a net loss of 14. In the Sixth Street lot, there will be a loss of 10 visitor spots to the Municipal Building and 46 added because of the expansion of the Sixth Street Lot, for a net gain of public parking spaces of 36. In the Library parking lot, they will lose 11 in the lot north of the Library and receive an additional 53 in the lot at the area of the Library, for a net gain of 42. The overall gain will be 78 public parking spaces and a loss of 14 on-street parking spaces, for a net gain of 64

public parking spaces. Currently, 20 are leased from the Church for the Library. With the proposal, the City will have control of the Library's parking spaces.

Mayor Parrott declared the public hearing open and solicited comments from the audience.

Mr. Jim Carter stated that he chaired the Building Committee at Jarvis Church, which is among the oldest in downtown Greenville, having had its first church service on March 10, 1907. Most of downtown from Martin Luther King, Jr. Drive to the river burned in 1910. The Church was renovated in the 1950s and 1970s, and the Jarvis Life Center was built in 1997. The Church made a commitment to stay downtown prior to building the Center, and that decision was reevaluated and reaffirmed when Tafts Furniture Store became available. The Church has an average of 35 day and night meetings weekly, with a minimum of 2500 people coming every week. Frequently, those people will meet or shop at the same time or bring their children to activities. The Church has run out of space, limiting its growth. Having the opportunity to enhance the programs of Jarvis would help the economic development of Downtown Greenville. The Church is committed to enhance the structure as true to its original façade as possible. The proposal before Council will be a positive step for everyone. It will increase the incidental exposure of future businesses by drawing more than 2500 people downtown each week. Mr. Carter concluded by stating that he feels strongly that when the full picture is viewed, the exchange of properties and construction of additional facilities will be a positive step for everyone in the revitalization of downtown Greenville.

Upon being asked if the Church could expand its operations on the current footprint of the Taft Office Building, Mr. Carter responded that it would be difficult because it would not be a good idea to put children's programs across two major intersections. It would be impossible to reconstruct the building.

Mr. Andy Piner of 511 Daventry Drive, a member of the Church, stated that Jarvis Church strongly supports the enhancement of Uptown Greenville and has a vested interest in the success of revitalization efforts. Jarvis has 2300 members, representing over ½ of the voting districts. Two of its ministries include Sadie Saulter School and Jarvis Afterschool. There will be discussions tonight on the adverse impact on business and fulfillment of the goal, and it is not accurate. The proposal does not have an adverse impact on traffic. The public and private parking lots will remain with no loss of parking. No designed street change will alter this. None of the government, social or geographic facts will be adversely impacted by the realignment. The City of Greenville recently did a renovation of City Hall. In cooperation with the City and local businesses, Jarvis joins in making the Center City and West Greenville revitalization a reality.

Mr. Albert Schuler, Senior Pastor at Jarvis Church, stated that for the past 100 years, the Church has taken seriously the call to be a ministry to their brothers and sisters. The Church is there for children, bible study opportunities, the homeless, counseling, and offering Jesus to the nonbelievers, to name a few. There are other things planned, such as providing a soup kitchen, job training for those unemployed, and helping others who want to give their life to Christ. The Church celebrates the fact that it is in a place where it can make a difference in the lives of people. The Church works together for the good of the larger community.

Ms. Delia Bootsa of the Teapot, stated that she is neither for nor against the request. She is concerned with decisions are made that impact her business without her having any input. She asked what the real plans for uptown Greenville are and asked if it would be more efficient if they could get on the same page and work together for everyone's benefit.

Mr. Rick Smiley, a member of the Historic Preservation Commission and Uptown Greenville, stated that this is not about how much value Jarvis Church brings to uptown Greenville, as everyone is in deep agreement with its value. Whatever is decided by the City Council, Jarvis Church will continue to do its good work. It has room to grow and is not going anywhere. This issue isn't about Jarvis Church; it is about the way these kinds of decisions are made and the way funds are raised and spent. His understanding is that the City is talking about spending almost \$2 million of the \$5 million bond funds for downtown revitalization for rearranging the street. There is a wide array of what the funds can be used for; however, he questioned to what extent these funds contributed to revitalization. Somewhere down the road, they may have the opportunity to build a more efficient parking deck. There is a very indirect benefit being gained here in the name of center city revitalization.

Mr. Greg Jarrell, a member of the Historic Preservation Commission, stated that his point of opposition is that the Council was made to make a decision with one option. He spent 30 minutes on his computer, taking the elements on the plan, and rearranged them so that streets don't have to be closed and so that Jarvis actually gained six parking spaces.

Ms. Marie Bradshaw stated that she has had her business downtown for 44 years and pays taxes on four stores—401 Evans Street and 422 Evans Street (where she has been 44 years), 427 Evans Street and 822 Dickinson Avenue. She doesn't feel that the streets need to be closed to constantly confuse people. She asked that the Council not close the streets, as she plans to be there 20 more years.

Mrs. Denise Walsh, Executive Director of Uptown Greenville, speaking as a concerned citizen, stated that this plan represents a bigger issue. The center city needs revitalization, and the proposed closure and moving of the street brings tangible improvements. However, that will take 1/3 of the bond funds allocated to revitalization. They can speculate about its impact; however, the fact is that \$1.8 million of the revitalization funds will be immediately used for moving a street and for some parking before other revitalization efforts. The Master Plan includes countless suggestions for improvement that would yield an impact, yet there is no talk of street relocation. The architectural plan needs to be shared with the taxpayers. The previous Revitalization Plan studies provide good information. This is the most central space in Greenville where there could be a center city park or statue of Nathanael Green, a place where everyone can enjoy. The center city has improved, but there needs to be more for the center city.

Ms. Katherine Wetherington of Dulcinea stated that this plan would severely affect her business. Currently there are 2500+ cars per day, more than 12,000 per week, traveling on Washington Street, and she relies on that traffic heavily for business. When she asks her customers how they found her, they say they were on their way to Greenville Utilities, Wachovia Bank, the Post Office, the courthouse, etc. She invested her family's savings to revitalize the back of the old Globe Hardware building, and it only faces Washington Street. The proposed plan is not fair, nor is it an appropriate use of bond funds. Instead of revitalization downtown, this will

devitalize Washington Street by moving traffic patterns in the opposite direction. The revitalization of uptown Greenville should be top priority. This plan will harm small businesses on Washington Street, and uptown has little hope of future flourishing without small businesses. Her business cannot survive the street closing. She asked the Council to seriously consider not closing the street.

Mr. Eric Clark, President of Uptown Greenville, stated that he is not opposed to anything that Jarvis Church wants to do. The problem lies with how the \$1.8 million will be funded. Using revitalization funds is not appropriate and is not an intended use of bond funds, nor is it what voters thought they were voting for. Mr. Clark offered several suggestions aside from the street closure and land trade that the funds could be used for. That would give them the ability to sell bond funds in the future. Mr. Clark concluded by suggesting that the Council try to work out an alternative plan with Jarvis.

Ms. Candace Pearce stated that she has served on all the committees, including the Bond Advocacy Committee, and none of them ever indicated closing these streets or spending money for this purpose. She is deeply committed to preservation of the character of Uptown Greenville, and feels that this will degregate it. She asked that the Council vote against the plan to close the street.

Mr. Al Boutillea, co-owner of Starlight Café, stated that closing the street can have a big impact on the lifeblood of the business community. Downtown Greenville almost collapsed before, but it is coming back. The small business owners have pioneered the way and gone downtown. Everybody who is trying to succeed here deserves a congratulations. The small parking area the City will gain through this land swap is too far away from the core area to be of value. Mr. Boutillea questioned why the City would consider using 1/3 of the bond money on this project, when it is not a revitalization project. It is a poorly conceived idea to benefit something totally unrelated to commerce. He asked that the Council respect the hard work of the downtown merchants and respect the business plan that was drawn up and conceived by the business community. This street closing has never been a part of plan. Jarvis can come up with a plan to benefit downtown, not threaten it.

As the time limit had passed, motion was made by Council Member Spell and seconded by Council Member Dunn to allow 30 more minutes for the public hearing.

Mayor Pro-Tem Council stated that if the time limit is extended, the Council will have to respect any other group that wants to speak longer by allowing them to do the same.

Motion made by Council Member Spell and seconded by Council Member Dunn to allow 30 more minutes for the public hearing was then voted on and carried with a vote of 5:1. Mayor Pro-Tem Council and Council Members Glover, Dunn, Spell and Little voted in favor of the motion. Council Member Craft voted in opposition.

Mr. Steve Smiley stated that in 1964, there was a plan to turn Evans Street from Five Points to Third Street into an enclosed mall with air conditioning with free federal money, and Evans Street Mall was constructed. This is not free money from the federal government. This is money being borrowed that will have to be repaid. It makes him wonder if the City will be able

to ask the citizens to vote for another bond issue. He requested that Jarvis Church drop this proposal to avoid lawsuits, bankruptcy, and community conflict.

Mr. Marvin Bolen stated that he runs a small business on Dickinson Avenue. Parking and a street crossing is the only thing presented as improving the area. Crossing the street with a group of children is something that will be supervised; that is not reason enough to disenfranchise Dickinson Avenue. It is a major thoroughfare and needs to continue to be so.

Dr. Susan Boutillea stated that this was not part of the revitalization bond issue, and it wasn't one of the ways the citizens were told the money would be spent. The City should look for ways to meet Jarvis' needs that don't compromise other people's needs and ways of life. They are not incompatible.

Mr. Ryan Webb, who is on the Downtown Executive Committee, stated that he is disappointed that funds from the bonds are starting to be spent and that a precedent is being set. Public perception is very important. If the City expects life to come back to Dickinson Avenue, cutting off this corridor will impact that. Creating this other street will create a lot of left turns onto Evans Street, and most people will just skip that area. Mr. Webb suggested that the Council postpone this until more discussion can happen on options.

Ms. Kim Turnage stated that downtown businesses are thriving the way the streets are now. This proposal will not benefit the businesses. She does not understand how this can be considered without the minimum requirements for letting people know about it. She suggested that since most people don't know about the proposal, more time should be given prior to the Council voting on it.

Ms. Christy Corhen stated that she operates a business on Evans Street. Closing the streets to expand a street will start a precedent. There is another historic church within a few blocks. Using bond funds to fund a nontaxpaying entity is not good, and she is very opposed to it. It will affect many of the downtown businesses. Ms. Corhen suggested that the Council entertain other options before voting on this one.

Mr. Randy Whitlow stated that he is very opposed to this and would not like to see bond money used for it. He is a property owner further down Dickinson Avenue and was assured that Dickinson Avenue would not be touched. This affects a lot of other things and should not be done now. Mr. Whitlow suggested that maybe it should be considered after the Tenth Street Connector is done to see what the needs are going to be.

Mr. Albert McLawhorn of Uptown Greenville stated that he is opposed to this because of the precedence it will set. There are a lot of churches in the area. The project has not been bid yet. The final design has not been done, and the figure is speculative. He doesn't think the City can enable a church to growth with taxpayer dollars and deny the same to another group or a taxpaying body.

Mr. Richard Barlow, Vice President of Uptown Greenville and a concerned citizen, expressed opposition to this item. The bottom line for any city is to improve the quality of life for its residents, and this is a mission for Uptown Greenville, which is charged with bringing more

residents and businesses uptown. He has spoken to a lot of other organizations in this part of the state. One big difference that he sees is that they have so much support and subsidies from the City, and that is one of the main reasons they have been successful. Other projects would do more for the community at large, projects that would have a tangible result and that would have a domino effect. This doesn't do the job the bonds were supposed to do. There are many people who would like to help come up with ideas.

Ms. Rosemary Hayes stated that every day she travels to Washington Street. She pays \$30 to park and have a business in downtown Greenville. If the City cuts an interior artery in town, it will be making a grave mistake. Ms. Hayes stated that she supports Jarvis Church and would like for them to work together.

There being no further comments, the public hearing was closed.

Council Member Little stated that nobody has mentioned that the City currently owns no parking associated with the library. This is a great opportunity for the City to have the property adjacent to the Library so that if it needs to expand there is sufficient area to do that. The City is going to continue to grow, and that is a focal part of downtown area. There are capital reserve funds available. He doesn't feel that all the funds should come from bond funds. There are currently funds set aside in parking decks, and this would be an opportunity to use some of that funding.

Council Member Spell stated that he received a resolution from the Historic Preservation Commission, requesting that the Council delay its decision so that a historic impact study can be done. He asked if that is adequate time to do one.

Mr. Merrill Flood, Director of Community Development, responded that the last study that was undertaken took 4.5 to 5 months, and it is anticipated that another study would take about the same amount of time.

Upon being asked if he saw this as having historical significance that justifies a historical study, Mr. Flood responded that it seems to be the concern of the public that there may be some issues relating to historic significance which an expert in the field would be able to determine. There are some designated historic structures in the area, but he is not an expert in the field qualified to make the determination.

Council Member Dunn stated that the speakers are concerned about this amount of money coming out of the bond funds. They have expressed that they would like to have been involved; to have been a part of the plan; and to have known more about the rationale, the long-range plan, and what the City is trying to accomplish. Another concern was this didn't appear to be part of the Master Plan for redevelopment of the center city. They are concerned about the flow of traffic. Council Member Dunn asked how many of the people in the audience had a business downtown, and approximately 15 people raised their hand. She concluded by informing the group that in the discussions that went on, the total rationale was not to accommodate Jarvis. There were discussions about exchange of property and money so that the City would get a proper return. She suggested that there may be some value in having the people come together with City staff to review it more in detail and to look at some other source of funding.

City Manager Bowers stated that there is \$3.6 million set aside in the Capital Reserve fund for a parking deck. Those funds could be used to substitute for all or a portion of the funds.

Council Member Craft stated that this information has been out since early April, and most Council Members haven't heard any opposition until the last ten days. There has been an opportunity for public input. The Redevelopment Commission has been around since 2002. He asked staff to comment on the time frame for the wayfinding projects and the parking lots.

Mr. Merrill Flood, Director of Community Development, stated that a consultant has been working on the wayfinding project, and it is hoped that there will be a contract in a couple of weeks.

Mr. Tom Tysinger, Director of Public Works, stated that there is a consultant working on a pilot parking plan for Reade Street to Fifth Street, and staff is about to break ground on the Moseley parking lot. There are a couple of things going on with regard to parking.

Council Member Craft stated that plans have a tendency to change, and people have to be flexible. He hasn't heard anybody saying that anything historical needs to be considered. There wasn't overwhelming support at the Historic Preservation Commission meeting concerning this.

Mayor Parrott stated that there have been MAI appraisals on all properties. Jarvis is giving up as much as the City is. The City is getting a parking lot adjacent to the Library on property along Evans Street and additional properties that it does not have access to at this time. The property the City is getting is conveniently located for public buildings as far as the Library is concerned. The City doesn't have hardly any land where the Library is. If Jarvis needed property for the needs of the Church, the City would lose all parking associated with Library, and parking is very important to the City and citizens. It is important for the City to expand the land on Evans Street in case it is needed down the road to building a parking deck. He doesn't know if a parking deck will go there or not. If it does, they have the right dimensions from an efficiency standpoint to build the parking deck. The chance of it going on that lot might be 50/50. There have been concerns that people don't want a parking deck there. The City may never get the chance to get this property again, and Jarvis Church will move forward with their plans with or without the City. Mayor Parrott stated that the businesses downtown may be making money; however, the City is trying to improve the downtown so they can do even better. This plan will get more people downtown to do business and will make it more of a walking community. The City is not considering this for Jarvis Church; it is doing this for the community and to get the land needed for public buildings that will be needed in the future.

Council Member Dunn stated that if the City decides to the sell the property, the arrangement is that they would have the first option at the fair market value. The citizens are concerned that they didn't have enough knowledge. She suggested that staff spend some time with the concerned citizens and business owners and come back in August.

Council Member Glover stated that Jarvis Church has been a tremendous help in the African-American Community, and the businesses have been good, too. There appears to have been a breakdown in communication. She doesn't want Jarvis Church to be seen as dividing the

community. She concurred that it may be beneficial for Uptown Greenville, Jarvis Church and someone from the City staff to engage in conversation before this is considered by Council.

Upon being asked if there are any time constraints, City Attorney Dave Holec replied that if the street closing order is not adopted by August 10, all terms and conditions of the contract are void.

Mayor Pro-Tem Council stated that the public hearing has occurred and additional time was allowed. The City is doing what is best for the City.

Mayor Parrott informed the audience that New Bern has a special tax levied on downtown businesses to help improve the downtown area. The bonds are paid by everybody in the community. There is no additional tax on downtown businesses, and a lot of money is going into downtown community to help improve it.

Council Member Craft stated that there are a lot of good things getting ready to take place downtown.

Motion was made by Council Member Craft to continue consideration of this resolution until August 6, 2007 to give everyone an opportunity to learn more about this.

An amendment was offered by Council Member Dunn that staff be instructed to meet with representatives of Uptown Greenville to go over the plan and that they be instructed to consider additional funds that might go into project.

Council Member Craft amended the amendment to include two representatives from the City, two from Jarvis Church, and two from Uptown Greenville.

The motion made by Council Member Craft and amended by Council Member Dunn to continue consideration of this resolution until August 6, 2007 to give two representatives from the City, two from Jarvis Church, and two from Uptown Greenville more opportunity to discuss the issue was then seconded by Council Member Spell. Mayor Pro-Tem Council offered another amendment that if the Council goes forward with this, that the funds be taken from Capital Projects. The motion, as amended, carried unanimously.

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 1001 COLONIAL AVENUE – ADOPTED

City Manager Wayne Bowers reported that a notice of public hearing was published in <u>The Daily Reflector</u> on June 4 and 11, 2007 setting this time, date and place for a public hearing to consider an ordinance requiring the repair or the demolition and removal of the dwelling located at 1001 Colonial Avenue.

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on September 6, 2006 to the property owner, Douglas Ray Thompson Heirs, informing the owner of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. The

most recent notice was sent on February 23, 2007, and provided notice that the dwelling was classified as an abandoned structure. Staff has attempted to work with the owner, but no repairs have been made. There have been 12 calls for service to the property by the Greenville Police Department from January 1, 2005 to May 20, 2007. The owner was mailed a notice on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since June 9, 2004. The meter was removed on December 16, 2004. The current tax value of the property is \$27,060 (the building value is \$23,808 and the land value is \$3640). Taxes are current on the property. The estimated costs to repair the dwelling are \$46,657. Costs to test and abate asbestos (if present) and demolition costs will be approximately \$6,500 to \$7,000.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Glover and seconded by Council Member Spell to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 1001 Colonial Avenue. Motion carried unanimously. (Ordinance No. 07-80)

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 609 WYATT STREET – ADOPTED

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on November 10, 2005 to the property owners, Willie Perkins and Walter Perkins, informing the owner of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. There have been five other certified and regular mailings regarding minimum housing violations of the dwelling. Staff has attempted to work with the owner, but no repairs have been made. The most recent mailing to the owner was sent on March 19, 2007, which provided notice to the owner that the dwelling was classified as an abandoned structure. Additionally, certified mailings have been sent from the City of Greenville Inspections Division of the Public Works Department on October 10, 2005; November 1, 2005; and November 29, 2005, informing the owner that the building was condemned. There have been seven calls for service to the property by the Greenville Police Department from January 1, 2005 to May 20 2007. The owner was mailed a notice on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since June 2000. The meter was removed in June 2001. Property taxes are current. The current tax value of the property is \$1,974 (the building value is \$14 and the land value is \$1,960). The estimated cost to repair the dwelling is Approximate costs for asbestos inspection abatement and demolition of the \$63,292,84. dwelling will be between \$6,500 and \$7,000.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Craft and seconded by Council Member Spell to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 609 Wyatt Street. Motion carried unanimously. (Ordinance No. 07-81)

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 105 RIDGEWAY DRIVE – ADOPTED

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on March 6, 2000 to the property owner, Perpetual Properties, informing the owner of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. There have been four other certified mailings regarding minimum housing violations of the dwelling. Staff has attempted to work with the owner, but no repairs have been made. The most recent mailing to the owner was sent on March 21, 2006, which provided notice to the owner that the dwelling was classified as an abandoned structure. A citation was issued on the property on March 6, 2000. There have been 25 calls for service to this property by the Greenville Police Department from January 1, 2005 to May 20, 2007. The owner was notified by mail on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since April 7, 2004, and the meter to the dwelling was removed on October 11, 2004. Taxes are current on the property. The tax value on the property is \$29,360 (the building value is \$22,420 and the land value is \$6,640). The estimated cost to repair the dwelling is more than \$50,000. Costs to test and abate asbestos (if present) and demolition costs will be approximately \$6,500 to \$7,000.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Little and seconded by Mayor Pro-Tem Council to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 105 Ridgeway Drive. Motion carried unanimously. (Ordinance No. 07-82)

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 202 NASH STREET – ADOPTED

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on September 21, 2006 to the property owner, Gaynelle E. Poteat, informing the owner of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. There have been three other certified mailings regarding minimum housing violations of the dwelling to the owner. The most recent notice was on May 18, 2007, which provided notice to the owner that the dwelling was classified as an abandoned structure. There have been 2 calls for service to this property for the Greenville Police Department for January 1, 2005 to May 20, 2007. The owner was notified by mail on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since July 22, 2004. The meter was removed on February 10, 2005. Taxes are current on the property. The current tax value on

the property is \$43,980 (the building value is \$41,040 and the land value is \$2,940). The estimated costs to repair the dwelling are \$30,022. Costs to test and abate asbestos (if present) and demolition costs will be approximately \$6,500 to \$7,000.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Dunn and seconded by Council Member Spell to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 202 Nash Street. Motion carried unanimously. (Ordinance No. 07-83)

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 411 WEST THIRD STREET – ADOPTED

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on December 15, 2006 to the property owner, Joseph M. Lantz of JayTee Properties, LLC, informing the owner of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. There have been three other certified mailings regarding minimum housing violations of the dwelling to the owner. The most recent notice was on May 18, 2007, which provided notice to the owner that the dwelling was classified as an abandoned structure. Staff has attempted to work with the owner, but no repairs have been made to the structure. There have been 22 calls for service to the property for the Greenville Police Department between January 1, 2005 and May 20, 2007. The owner was mailed a notice on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since May 30, 2006 on unit A and December 20, 2002 on unit B. The meter on unit A of the dwelling was removed on August 18, 2006 and on Unit B on July 24, 2003. Property taxes for the property are current. The current tax value on the property is \$50,540 (the building value is \$42,240 and the land value is \$8,300). The estimated cost to repair the dwelling is \$33,520. Costs to test and abate asbestos (if present) and demolition costs will be approximately \$6,500 to \$7,000.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Craft and seconded by Council Member Spell to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 411 West Third Street. Motion carried unanimously. (Ordinance No. 07-84)

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 413 WEST THIRD STREET - ADOPTED

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on December 15, 2006 to the property owner, Gaynelle Poteat, informing the owner of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. There have been three

other certified mailings regarding minimum housing violations of the dwelling to the owner. The most recent notice was on May 18, 2007, which provided notice to the owner that the dwelling was classified as an abandoned structure. There has been 1 call for service to the property for the Greenville Police Department between January 1, 2005 until May 20, 2007. The owner was mailed a notice on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since April 13, 2006 on unit A and on unit B since January 29, 2003. The meter on unit A of the dwelling was removed on August 18, 2006 and on unit B on August 14, 2003. Taxes are current for the property. The current tax value on the property is \$50,540 (the building value is \$42,240 and the land value is \$8,300). The estimated cost to repair the dwelling is \$33,520. Costs to test and abate asbestos (if present) and demolition costs will be approximately \$6,500 to \$7,000.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Spell and seconded by Council Member Little to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 413 West Third Street. Motion carried unanimously. (Ordinance No. 07-85)

ORDINANCE REQUIRING THE REPAIR OR THE DEMOLITION AND REMOVAL OF THE DWELLING LOCATED AT 113 WADE STREET – ADOPTED

Ms. Rhonda Jordan, Code Enforcement Coordinator, stated that the initial notice of violation was sent by certified and regular mail on July 24, 2001 to the property owners, Icelean Davis Payton and William Earl Payton, informing the owners of the minimum housing violations cited by the Code Enforcement Officer and of the remedies necessary to bring the dwelling into compliance. There have been five other certified mailings sent to the owner regarding minimum housing violations of the dwelling. Staff has attempted to work with the owner, but no repairs have been made. The most recent notice to the owner was sent on June 22, 2004, which provided notice to the owner that the dwelling was classified as an abandoned structure. There have been 6 calls for service to the property by the Greenville Police Department between January 1, 2005 until May 20, 2007. The owner was mailed a notice on June 4, 2007 that this item would be considered at the June 14, 2007 City Council meeting. The dwelling has been vacated and closed for a period of at least six months. The utilities to the dwelling have been disconnected since September 6, 2000, and the meter to the dwelling was removed on October 24, 2000. Taxes are current for the property. The current tax value on the property is \$24,020 (the building value is \$18,810 and the land value is \$5,210). The estimated costs to repair the dwelling are \$40,000. Costs to test and abate asbestos (if present) and demolition costs will be approximately \$6,500 to \$7,000 due to the size of the structure.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Craft and seconded by Council Member Spell to adopt the ordinance requiring the repair or demolition and removal of the dwelling located at 113 Wade Street. Motion carried unanimously. (Ordinance No. 07-86)

<u>APPLICATION FOR FUNDS FROM THE EDWARD BRYNE MEMORIAL JUSTICE</u> ASSISTANCE GRANT PROGRAM – APPROVED

Mr. William Anderson, Chief of Police, stated that the Department has received information from the United States Justice Department that it is once again eligible to receive funds from the Edward Byrne Memorial block grant program. The Bureau of Justice Assistance designates block grants based on the size of a jurisdiction and level of activity. The Bureau of Justice Assistance informed the City that the Police Department is eligible to receive \$68,600 from this grant. The Police Department intends to purchase additional in-car camera systems to be installed in patrol vehicles. It has been working toward outfitting all patrol cars with camera systems for a number of years, and it currently has 19 camera systems and 767 patrol vehicles. The grant requires that a public hearing be held before the final application can be approved and the funds distributed, and the funds will be distributed at the beginning of the next federal fiscal year which begins on October 1, 2007.

Mayor Parrott declared the public hearing open and solicited comments from the audience. There being none, the public hearing was closed.

Motion was made by Council Member Dunn and seconded by Mayor Pro-Tem Council to approve the application for funds from the Edward Bryne Memorial Justice Assistance Grant Program. Motion carried unanimously.

PUBLIC COMMENT PERIOD

There were no citizens signed up to speak during the public comment period.

ORDINANCE ANNEXING THE RIVER HILL AREA LOCATED SOUTH OF THE TAR RIVER, ON THE NORTH SIDE OF NC HIGHWAY 33, AND WEST OF NCSR 1726 (PORTERTOWN ROAD), BEING ALL OF THE RIVER HILL SUBDIVISION AND THE ADJOINING PROPERTY ALONG NC HIGHWAY 33 - ADOPTED

Mr. Mike Dail, Planner, delineated the property on a map and stated that the area encompasses approximately 83.99 acres containing 154 single-family homes (all occupied), 1 cemetery, 1 commercial business and 8 vacant lots. The total annexation area population is 337. All municipal services will be extended to the area immediately upon the effective date of annexation on substantially the same basis and in the same manner as provided within the rest of the City prior to annexation. Fire service will be provided primarily from Fire Station #6, which is 1.2 miles from the annexation area. On April 14, 2005, the City Council adopted a resolution of consideration that identified a number of areas for potential annexation, including the River Hill Area. The resolution was reaffirmed by City Council on March 8, 2007, when a resolution of intent was adopted that stated the intent to consider the River Hill Area for annexation. The resolution contained a legal description of the River Hill Area and set the date for the public informational meeting on April 25, 2007 and set the date for the public hearing on the question of annexation for May 10, 2007. An annexation report of the area was prepared and has been available for public inspection at the Office of the City Clerk. All statutory requirements have

been met. If the ordinance annexing the River Hill Area is adopted, the effective date of the annexation will be June 30, 2008.

Motion was made by Mayor Pro-Tem Council and seconded by Council Member Dunn to adopt the ordinance annexing the River Hill Area, located south of the Tar River, on the north side of NC Highway 33, and 370 feet west of NCSR 1726 (Portertown Road), being all of the River Hills Subdivision and the adjoining property along NC Highway 33. Motion carried unanimously. (Ordinance No. 07-87)

SIXTH STREET RELOCATION PROJECT ENGINEERING DESIGN CONTRACT AWARD AND RESOLUTION EXEMPTING THE SIXTH STREET RELOCATION PROJECT FROM THE STATUTORY PROCUREMENT PROCESS FOR ARCHITECTURAL AND ENGINEERING SERVICES – CONTINUED TO AUGUST 6, 2007

Motion was made by Council Member Spell and seconded by Council Member Dunn to continue this request until August 6, 2007. Motion carried unanimously.

REQUEST BY PITT COUNTY SCHOOLS TO PROVIDE SEWER SERVICE TO PACTOLUS AND STOKES SCHOOLS – APPROVED

City Manager Bowers stated that Pitt County Schools has requested that Greenville Utilities Commission provide sewer service to Pactolus and Stokes Schools, which is a request that is consistent with past Pitt County Schools/Greenville Utilities Commission cooperative efforts in providing sewer service to public schools outside the City limits. Similar arrangements have been made for eight other schools. Since both of these schools are located outside the City's extraterritorial jurisdiction, in accordance with Greenville Utilities Commission's Charter, City Council approval of the sewer extensions is required. The Greenville Utilities Board of Commissioners approved the request on April 17, 2007.

Mr. Aaron Beaulieu, Associate Superintendent of Pitt County Schools was present to answer questions.

Motion was made by Council Member Craft and seconded by Council Member Dunn to approve Greenville Utilities Commission providing sewer service to Pactolus and Stokes Schools. Motion carried unanimously.

ORDINANCE AMENDING SECTION 12-1-2 OF THE CITY CODE RELATING TO CONSUMPTION OF ALCOHOLIC BEVERAGES IN PUBLIC - ADOPTED

City Attorney Holec stated that this amendment would allow the City Manager to grant permission for the possession and consumption of malt beverages and unfortified wine on public streets closed to regular traffic for special events, such as festivals.

Motion was made by Council Member Spell and seconded by Council Member Little to adopt the ordinance allowing the City Manager to grant permission for the possession and consumption of malt beverages and unfortified wine on public streets closed to regular traffic for special events. Motion carried unanimously. (Ordinance No. 07-88)

<u>CONTRACT AWARD FOR THE 2007 SIDEWALK CONSTRUCTION PROJECT – APPROVED</u>

Motion was made by Council Member Craft and seconded by Council Member Dunn to award a construction contract for the 2007 Sidewalk Construction Project to Empire Construction Company, Inc., in the amount of \$427,735.00. Motion carried unanimously. (Contract No. 1602)

<u>CONTRACT AWARD FOR THE 2006-2007 STREET RESURFACING PROJECT -</u> APPROVED

Motion was made by Council Member Craft and seconded by Council Member Dunn to award a construction contract for the 2006-2007 Resurfacing Project to Barnhill Contracting Company in the amount of \$622,552.60. Motion carried unanimously. (Contract No. 1603)

GREENVILLE UTILITIES COMMISSION FY 2006-2007 BUDGET ORDINANCE AMENDMENTS (END-OF-YEAR) – ADOPTED

Motion was made by Council Member Craft and seconded by Council Member Dunn to adopt the Greenville Utilities Commission FY 2006-2007 budget ordinance amendments. Motion carried unanimously. (Ordinance No. 07-89)

ORDINANCE AMENDMENT #10 TO THE CITY OF GREENVILLE 2006-2007 BUDGET AND BUDGET AMENDMENT TO ORDINANCE NO. 99-23 COMPUTERIZED TRAFFIC SIGNAL, AND ORDINANCES ESTABLISHING CAPITAL PROJECT BUDGETS FOR THE WEST THIRD STREET RECONSTRUCTION AND EMPLOYEE PARKING LOT EXPANSION/IMPROVEMENT – ADOPTED

Motion was made by Council Member Craft and seconded by Council Member Dunn to adopt Ordinance Amendment #10 to the 2006-2007 City of Greenville Budget and Budget Amendment to Ordinance No. 99-23 Computerized Traffic Signal Project, and approve ordinances establishing capital project budgets for the West Third Street Reconstruction and Employee Parking Lot Expansion/Improvement Capital Projects. Motion carried unanimously. (Ordinance Nos. 07-90, 07-91 and 07-92)

ORDINANCES ADOPTING BUDGETS FOR THE 2007-2008 FISCAL YEAR: CITY OF GREENVILLE (INCLUDING SHEPPARD MEMORIAL LIBRARY AND GREENVILLE-PITT COUNTY CONVENTION AND VISITORS AUTHORITY) AND THE GREENVILLE UTILITIES COMMISSION – ADOPTED

Motion was made by Mayor Pro-Tem Council and seconded by Council Member Spell to adopt the ordinances adopting the budgets for the FY 2007-08 City of Greenville and Greenville Utilities Commission budgets.

Council Member Little asked that the money appropriated for a neighborhood liaison be placed in the contingency plan. He stated that there is a crossover of the duties of the Neighborhood Services Coordinator and the Neighborhood Liaison being proposed. He questioned whether that is the most effective way to spend money in that department.

Council Member Glover concurred, stating that the City has to be careful when creating full time jobs. With the Neighborhood Services staff being new, they haven't had time to be properly trained to do code enforcement. She has shared her ideas with the City Manager and Mr. Merrill Flood. The City doesn't need to put the position there, because once it is added, it will be permanent. It needs to be moved to contingency. She suggested getting Neighborhood Services staff up-to-par with training. She is not opposed to staff having help.

Council Member Spell disagreed, as the position was in the Financial Plan approved earlier this year. The item was mentioned as a model from other cities. The department used to be Neighborhood Services, and then it became Code Enforcement. Somebody in local government needs to help neighborhoods. He sees this as two positions.

Council Member Craft stated that there are some issues with them getting up to speed. There may be opportunities that the things being looked for could be shared or come out of the current position.

Council Member Little suggested that the funds that were going to be set aside for a neighborhood liaison be taken out of Neighborhood Services and put into contingency.

City Manager Bowers stated that this was pursued because of City Council's objective to assist code enforcement. If it is proactive, the work load will be lowered because the problems are addressed before they become problems.

City Manager Bowers stated that if it is in the budget, it will be filled; however, if it is in contingency, it will not be filled. Staff can take a look at the overall needs and come back with a recommendation on whether this should be a clerical position. He would like some time to think about it.

Motion was made by Council Member Little and seconded by Council Member Craft to take the funds set aside for a neighborhood liaison and put them into contingency. Motion failed with a vote of 3:4. Council Members Glover, Craft and Little voted in favor of the motion. Mayor Pro-Tem Council and Council Members Dunn and Spell voted in opposition to the motion. Mayor Parrott broke the tie by voting in opposition to the motion.

Motion was made by Council Member Craft and seconded by Council Member Spell to do a one time expense and buy a GTV van for \$16,000, taking the funds from contingency. Motion carried with a vote of 5:1. Council Members Dunn, Little, Craft, Spell and Glover voted in favor of the motion. Mayor Pro-Tem Council voted in opposition.

Motion was made by Council Member Spell and seconded by Council Member Craft to adopt the FY 2007-2008 City of Greenville budget ordinance, which included the budgets for the City, Sheppard Memorial Library and the Convention and Visitors Authority. Motion carried unanimously. (Ordinance No. 07-93)

Motion was made by Council Member Spell and seconded by Council Member Craft to adopt the FY 2007-2008 Greenville Utilities Commission budget ordinance. Motion carried unanimously (Ordinance No. 07-94)

AGREEMENT WITH PITT COMMUNITY COLLEGE TO CONSTRUCT AN AFFORDABLE HOME ON CITY PROPERTY AT 605 HUDSON STREET – APPROVED

Motion was made by Council Member Spell and seconded by Council Member Dunn to enter into an agreement with Pitt Community College to construct an affordable home on City property at 605 Hudson Street. Motion carried unanimously.

COMMENTS FROM MAYOR AND CITY COUNCIL

Mayor Pro-Tem Council reported on the following:

- The 15th season of the Jackie Robinson Baseball opens Saturday at 5:00 p.m.
- There were eight youth from the Pitt County 4-H Allstars that graduated from high school this year.
- A proclamation was prepared by Mayor Parrott declaring Tuesday, June 19, as Juneteenth.

CITY MANAGER'S REPORT

Upon being told that there was no business that needed to be conducted on June 25, 2007, motion was made by Council Member Craft and seconded by Council Member Spell to cancel the June 25, 2007 City Council meeting. Motion carried unanimously.

<u>ADJOURN</u>

Motion was made by Council Member Spell and seconded by Council Member Craft to adjourn the meeting at 12:35 a.m. Motion carried unanimously.

Respectfully submitted,

Wanda T. Elks, MMC City Clerk



City of Greenville, North Carolina

Meeting Date: 8/6/2007 Time: 6:00 PM

Title of Item: Resolution amending the Board and Commission Policy by removing references

to the Citizens Advisory Commission on Cable Television

Explanation: On June 11, 2007, the City Council adopted Ordinance No. 07-67, which

dissolved the Citizens Advisory Commission on Cable Television. This resulted in a need to amend the Board and Commission Policy for the City of Greenville

to delete the two sections referencing the Commission, one dealing with

appointments and the other dealing with serving on two boards simultaneously.

Fiscal Note: None

Recommendation: Adopt the resolution amending the Board and Commission Policy for the City of

Greenville by removing references to the Citizens Advisory Commission on

Cable Television.

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Attachments / click to download

Ordinance amending the Boards and Commissions Appointment Policy 707430

Comparison of Version 2 and 3 of Boards and Commissions Policy 707496

RESOLUTION NO. 07-_____ RESOLUTION AMENDING THE BOARD AND COMMISSION POLICY FOR THE CITY OF GREENVILLE BY REMOVING REFERENCES TO THE CITIZENS ADVISORY COMMISSION ON CABLE TELEVISION

WHEREAS, on April 13, 2006, the Greenville City Council adopted Resolution No. 06-14, which created a new "Board and Commission Policy for the City of Greenville";

WHEREAS, the Board and Commission Policy for the City of Greenville makes reference to the Citizens Advisory Commission on Cable Television in two sections, one dealing with appointments and the other dealing with serving on two boards simultaneously; and

WHEREAS, on June 11, 2007, the Greenville City Council adopted Ordinance No. 07-67, which dissolved the Citizens Advisory Commission on Cable Television, resulting in the need to remove those references from the Policy;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF GREENVILLE:

- <u>Section 1</u>. That the Board and Commission Policy for the City of Greenville is hereby amended by deleting all reference to the Citizens Advisory Commission on Cable Television;
- <u>Section 2</u>. That all resolutions and clauses of resolutions in conflict with this resolution are hereby repealed; and

Section 3. That this resolution shall become effective upon its adoption.

This 6th day of August, 2007.

	Robert D. Parrott, Mayor	
ATTEST:		
Wanda T. Elks, City Clerk	_	

BOARD AND COMMISSION POLICY FOR THE CITY OF GREENVILLE

Having citizens to serve on boards and commissions gives them an opportunity to participate in local government. In order to maintain some consistency, a policy has been adopted to aid in the appointment process and in other areas dealing with the boards and commissions. In order to provide all citizens of Greenville with an opportunity to serve on City boards and commissions, this board and commission policy is being established.

Talent Bank

A pool of applicants for the various boards and commissions, called the talent bank, shall be maintained by the City Clerk's Office. This talent bank shall be updated on a biennial basis. Solicitation of applications for this pool of applicants shall be done through such methods as advertising in local newspapers, the City website and the government access channel.

Appointments

City Council Members shall be notified of upcoming appointments to City boards and commissions by the first day of the month preceding the month in which the appointment is to be made. A list of persons who have indicated an interest in serving on the board or commission through the talent bank shall also be provided to the City Council.

The list of upcoming appointments shall be advertised in the local newspaper, on the government access channel and on the City's website at least four weeks prior to the meeting at which the appointment is to be made in order to provide citizens with an opportunity to indicate their interest in serving.

Prior to the 15th day of the month preceding the month in which the appointment is to be made, City Council Members shall submit any nominations for upcoming vacancies to the City Council liaison to the board or commission. City Council liaisons shall be provided a copy of resumes from citizens for upcoming appointments as they are received by the City Clerk's Office.

During review of nominations for upcoming appointments, City Council liaisons may request the City Clerk's assistance in obtaining the nominees' addresses and any pertinent background information. The City Council liaison shall contact the individual to discuss the applicant's interest in the board and his/her ability to attend the meetings in accordance with this policy.

Several of the boards and commissions have representation from other entities. Also, criteria for the membership is noted in the by-laws or ordinance creating many of the boards and commissions. The criteria and/or appointment process are detailed below.

Affordable Housing Loan Committee. The committee shall have seven regular members and one alternate member. It shall be racially diverse and composed of persons with experience and an interest in housing. The members may be of the following professions: banker, lawyer, realtor, member of the building profession or developer, member of a social service organization, and a member of a local housing group.

Board of Adjustment. The board shall consist of seven regular members and four alternate members. Five of the regular members and three alternate members shall reside within the corporate limits of the City of Greenville at the time of their appointment and shall be appointed by the City Council. Two of the regular members and one alternate member shall reside outside of the corporate limits of the city but within the extraterritorial jurisdiction at the time of their appointment and shall be appointed by the Board of Commissioners. City members shall be appointed by the City Council in accordance with this policy and the City Clerk's Office shall send the appointment letters for those members. The County Commissioners shall appoint county candidates and the appointment letter shall be sent from the County Clerk's Office for those appointments. A copy of the appointment letter shall be sent to the City Clerk's Office, at which time the City records shall be updated.

<u>Community Appearance Commission</u>. The commission shall consist of 15 members, all of whom shall be citizens and residents of the city.

Environmental Advisory Commission. The commission shall have seven members that are designated as follows: (A) a lawyer; (B) a building contractor, land developer, or someone familiar with construction techniques; (C) a member of a local environmental group; (D) a professor of the natural or physical sciences (E) a professional engineer; (F) an at-large member from the Greenville community; and (G) an at-large member from the Greenville community with an active interest in the preservation of significant architectural/historical housing in the city. The Mayor shall serve as an ex-officio non-voting member of the commission.

<u>Firemen's Relief Fund Committee</u>. The committee shall consist of five trustees. The firemen shall elect two members, the City Council shall elect two members, and the Commissioner of Insurance shall appoint one representative to serve as trustee and he shall serve at the pleasure of the Commissioner.

Greenville Utilities Commission. The commission shall consist of eight members, one of whom is the City Manager. The charter specifies that the members shall have utilities expertise. Representation should include some members with financial, engineering, environmental, technical, or development backgrounds. Five City members shall be appointed by the City Council in accordance with this policy, and appointment letters for the City members sent by the City Clerk's Office. Two County candidates shall be nominated by the County Commissioners, at which time the County Clerk shall submit to the City Clerk a letter of recommendation. (The two candidates shall be bonafide residents of Pitt County but residing outside the city limits, who shall be customers of Greenville Utilities.) The City Clerk's Office shall

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then obtain background information on the nominee and provide it along with the letter to the City Council liaison. The information shall be provided to City Council for consideration at a regular City Council meeting. The City Council shall have the right to reject any nominee from the Board of Commissioners and to request additional nominees. If the Pitt County Board of Commissioners fails to recommend a nominee to the City Council within 60 days of the original date requested by the City Council, then the City Council may appoint any individual that meets the residency requirement. The City Clerk's Office shall send a letter of appointment to the new members informing them of the appointment. A copy of the letter for County appointments shall be sent to the County Clerk. Greenville Utilities Commissioners filling the first three-year term shall automatically fill a second three-year term unless the City Council initiates the replacement process.

<u>Historic Preservation Commission</u>. The commission shall consist of ten members, the majority of whom shall have demonstrated special interest, experience, or education in history, architecture, and/or archaeology.

<u>Housing Authority</u>. The seven Housing Authority members are appointed by the Mayor. No commissioner may be a city official. At least one of the commissioners shall be a person who is directly assisted by the public housing authority. If the commissioner directly assisted by the public housing authority ceases to receive such assistance, the commissioner's office shall be abolished and another person who is directly assisted by the public housing authority shall be appointed by the Mayor.

<u>Human Relations Council</u>. The 14-member council shall consist of ten regular members, two high school representatives and two representatives appointed to serve from an institution of higher learning. Nominations from the high schools and the institutions of higher learning shall be submitted to City Council for consideration.

<u>Pitt-Greenville Airport Authority</u>. The authority shall have eight members, four appointed by the City Council and four appointed by the Pitt County Commissioners. The City Council and Pitt County Commissioner liaisons shall serve as voting members of the authority. City members shall be appointed by the City Council in accordance with this policy. Appointment letters shall be sent by the City Clerk's Office for City Members. County members shall be appointed by the County Commissioners, and appointment letters for those members sent by the County Clerk's Office. A copy of the letter shall be forwarded to the City Clerk's Office, at which time the City records shall be updated.

<u>Pitt-Greenville Convention and Visitors Authority</u>. The authority shall have eleven members as follows: Four owners or operators of hotels, motels, or other taxable accommodations, two of whom shall be appointed by the Pitt County Board of Commissioners and two of whom shall be appointed by th City Council; two individuals who are directly involved in a tourist or convention-related business but do not own or operate a hotel, motel, or other taxable accommodation, one appointed by the Board of Commissioners and one appointed by the City Council; two residents of Greenville, appointed by the City Council, and two residents of Pitt County but not

3

of Greenville, appointed by the Pitt County Board of Commissioners, none of whom is involved in a tourist or convention-related business or owns or operates a hotel, motel, or other taxable accommodation; and one individual who is a member of the Pitt-Greenville Chamber of Commerce, appointed by the Chairman of the Board of Directors of the Pitt-Greenville Chamber of Commerce. City members of the Convention and Visitors Authority Board shall be appointed by the City Council. Appointment letters shall be sent by the City Clerk's Office for the City appointments. The City Council shall also make a nomination to the County on five of the members, and appointment of County members shall be made by the Pitt County Commissioners based on the nominations of City Council. The Board of Commissioners has the right to reject any nominee from the City Council and request additional nominees. If the City Council fails to recommend a nominee to the County within sixty days after a written request for nominees is sent by the County to the City, then the Board of Commissioners may appoint any individual meeting the eligibility requirements of the Enabling Legislation. The County Clerk shall be responsible for sending out appointment letters for County members. The Chamber of Commerce shall appoint one of its members and is responsible for sending out the appointment letter for that appointment and sending a copy of the letter to the City Clerk's Office, at which time the records are updated.

<u>Planning and Zoning Commission</u>. The commission shall be composed of nine regular members and three alternate members. Appointments of members appointed by City Council shall be made to promote the representation of a variety of interests. This representation should include some members with environmental, neighborhood preservation, development and business interests. Seven regular City members and two alternate members shall reside within the corporate limits of the City and shall be appointed by the City Council. Appointment letters shall be sent from the City Clerk's Office for the City appointments. The County Commissioners shall appoint two regular County members and one alternate member. The appointment letter for County appointees shall be sent from the County Clerk's Office. A copy of the appointment/reappointment letters shall be sent to the City Clerks' Office, at which time the City records shall be updated.

<u>Police Community Relations Committee</u>. The committee shall be composed of seven members (one from each district, one at-large and one appointed by the Mayor). Members are appointed directly by the Mayor and individual Council Members. Members should not hold any elected office.

<u>Public Transportation and Parking Commission</u>. The commission shall be composed of seven members, all of whom shall be citizens and residents of the City. Each member shall be appointed by the City Council.

<u>Recreation and Parks Commission</u>. The commission shall be composed of nine members, all of whom shall be residents of the City. Each member shall be appointed by the City Council.

<u>Redevelopment Commission</u>. The commission shall consist of seven members, all of whom shall be residents of the City. Each member shall be appointed by the City Council.

Sheppard Memorial Library Board. The board shall consist of nine members. City members shall be appointed by the City Council in accordance with this policy. Appointment letters shall be sent from the City Clerk's Office for the City appointments. The County Commissioners shall appoint county candidates, and the appointment letters for County members shall be sent from the County Clerk's Office. A copy of the appointment/reappointment letter shall be sent to the City Clerks' Office, at which time the City records shall be updated. The City Council liaison to the Sheppard Memorial Library Board shall serve as a voting ex-officio member of the Board.

Youth Council. The Greenville Youth Council shall be composed of twenty-five members as follows: three representatives from each of the Pitt County public high schools; one representative from each of the private schools located in Pitt County (Trinity Christian School, Greenville Christian Academy, Calvary Christian Academy, and The Oakwood School), one home schooled student; and two youth members from the Human Relations Council. With the exception of the two youth members from the Human Relations Council, all members shall be appointed by City Council.

When an appointment is to be made by City Council on a particular board or commission, the City Council liaison shall contact the City Clerk's Office by noon on the Monday prior to the Thursday City Council meeting with a name of the person to be recommended for appointment. (Exceptions to this are (1) the Police Community Relations Committee, to which the Mayor and City Council Members each make individual appointments without a vote of City Council, (2) the Housing Authority, to which the Mayor makes the appointments, and (3) the Redevelopment Commission, to which the Mayor and each Council Member make a nomination for the individual members so that the Commission consists of members appointed by City Council after receipt of a nomination by either the Mayor or a Council Member.) If a talent bank form is not on file for the individual, the City Council Member shall be responsible for providing one to the City Clerk prior to that time. The City Clerk's Office shall be responsible for providing a copy of the talent bank form to all City Council Members at the Monday night meeting so that a recommendation can be made by the City Council liaison for appointment on Thursday night. Talent bank forms shall be provided to City Council on Monday night and the recommendation discussed, giving other City Council Members an opportunity for comment on the recommendation. A consensus on appointees shall be made at the Monday meeting. If written information is unavailable to be presented at the Monday night meeting. the City Council liaison shall provide a copy of the talent bank form to the City Clerk's Office by Wednesday at noon to be submitted to Council in the Wednesday Notes to Council. Official action on appointments shall be taken at the Thursday Council meeting held during the month in which the appointment is due, unless a recommendation has not been selected, at which time the appointment shall be continued to the following month.

Appointment to a Board at the Conclusion of Service on a Board

When a citizen completes at least one full term on a board or commission, that person shall be eligible to serve on another as a City member at the completion of the term. However, a one-year waiting period is required in order to serve on the same board or commission.

Alternate Members

On certain boards and commissions, members shall originally be appointed as Alternate Members in order to provide a learning period unless there are more vacancies on the Board than the number of alternate slots for the Board at the time of appointment (see last sentence of this section). The alternates vote only when a regular member is absent or unable to vote. City alternates shall be provided for various boards as follows:

Affordable Housing Loan Committee Alternate

Board of Adjustment Alternate Nos. 1, 2 and 3
Planning and Zoning Commission Alternate Nos. 1 and 2

Alternates shall move up in rank or to a regular member slot as vacancies become available on the board upon approval by the City Council and in accordance with the following rotation. In the instance of only one alternate, when a vacancy becomes available to replace regular member, the alternate shall move up and a new alternate member appointed. In the instance of two alternates, when a vacancy becomes available to replace a regular member, Alternate #1 shall be elevated to a regular member, Alternate #2 shall be elevated to Alternate #1, and a new Alternate #2 appointed. In the instance of three alternates, when a vacancy becomes available to replace a regular member, Alternate #1 shall be elevated to a regular member, Alternate #2 shall be elevated to Alternate #1, Alternate #3 shall be elevated to Alternate #2, and a new Alternate #3 appointed. In the event that there are two elevations at one time, the Alternate members shall move in the order in which they would have normally been elevated.

Reappointments

Persons serving on City boards and commissions having a term of more than three years shall be ineligible for consideration for reappointment. Persons serving on City boards and commissions having a term of three years or less shall be eligible for consideration for reappointment to a second term, but shall be ineligible for a third term. Persons serving unexpired terms on any City board or commission shall be eligible for consideration for appointment to a full term. On joint City and County boards, such as the Pitt-Greenville Airport Authority and the Sheppard Memorial Library Board, City appointees may be reappointed to a second term. The purpose of this exception is to create the same reappointment policy for City appointees as that of the County on joint City/County boards; this policy shall be reviewed if the County of Pitt amends the County appointment policy with regard to joint City/County boards. The Housing Authority shall also be excepted, in that it is regulated by the provisions of State Statute.

Resignation of Board or Commission Members Elected to Public Office

Members of City boards or commissions who are elected as Mayor or as a City Council Member shall submit a resignation from the board or commission prior to becoming installed as an elected official.

Service of a Full-Time Employee on a Board or Commission

A full-time employee of the City of Greenville shall not be eligible to serve on a city authority, board, commission or committee as an appointee of the Mayor, City Council or a Council Member. If such a member becomes a full-time employee of the City of Greenville, that shall constitute a resignation from the authority, board, commission or committee upon which he serves, effective upon the date a replacement is appointed. The prohibition established herein shall not apply to any current full-time City employee who is currently serving on an authority, board, commission or committee for so long as said employee serves on the same body until the completion of the current term. The prohibition established herein shall not apply to service resulting from being an ex-officio member.

Serving on Two Boards Simultaneously

Individuals shall not serve on more than one of the following boards or commissions as a City Council appointment at the same time. The list of boards and commissions that fall in this category include:

Affordable Housing Loan Committee Board of Adjustment Community Appearance Commission **Environmental Advisory Commission** Firemen's Relief Fund Committee Greenville Utilities Commission Historic Preservation Commission **Housing Authority Human Relations Council** Pitt-Greenville Airport Authority Pitt-Greenville Convention and Visitors Authority Planning and Zoning Commission Police Community Relations Committee Public Transportation and Parking Commission Recreation and Parks Commission Redevelopment Commission Sheppard Memorial Library Board Youth Council (except that two members shall serve as members of the Human Relations Council)

Individuals shall not hold more than two appointive offices or more than one appointive office and an elective office concurrently in violation of North Carolina General Statute 128-1.1.

Designation of Liaisons and their Roles and Responsibilities

<u>Designation</u>. The Mayor shall designate City Council Members and the Mayor as liaisons to boards and commissions whose members are appointed by the City. Prior to the designation of the liaisons, the Mayor shall ask Council Members to which boards and commissions they prefer to be designated

as liaison. The Council Members shall be provided an opportunity to discuss their choices with the Mayor.

<u>Length of Designation</u>. The liaisons shall serve until the end of their elected two-year term as a City Council Member or the Mayor.

Roles of the Liaisons. The liaison is a communication link between the City Council and the appointed board or commission. The liaison role is not to regularly and actively discuss subjects on the agenda with the board or commission members, but to offer insight into overall City goals and policies that have been adopted by the City Council as it may relate to an issue being considered by the board or commission. The liaison, from time to time as appropriate, shall inform City Council of major activities of the board or commission.

<u>Attendance</u>. The attendance at board or commission meetings is at the discretion of the liaison. While attendance at every meeting is not required, attendance sufficient to understand the subjects before the board or commission is important.

<u>Voting</u>. The liaison is not a voting member of the board or commission and may not make motions at a meeting of the board or commission. The exception to this is the Sheppard Memorial Library Board of Trustees and the Pitt-Greenville Airport Authority where the liaison is a voting member and should participate as a full member.

<u>Appointments</u>. The liaison is to review the applications in the talent bank for vacancies on the board or commission and to make recommendations of persons to City Council to fill the vacancies. The exception to this is the Housing Authority to which the Mayor has appointive authority and the Police Community Relations Committee to which each individual City Council Member has appointive authority.

Attendance of Members

All appointed members of the various boards and commissions are expected to attend all regular meetings. Whenever a member of any board or commission has missed three or more consecutive regular meetings or fails to attend seventy-five percent of all regularly scheduled meetings, the staff liaison to the board or commission shall notify the City Clerk of the member's attendance record. The City Clerk's Office shall send a letter to the member asking to be notified about the person's ability to attend future meetings. A copy of the letter shall be sent to the City Council liaison, and the attendance will be monitored for a period of three months, at which time replacement may occur if the attendance requirements are still not met. If the member responds that he desires to continue serving and will attend future meetings on a regular basis, the City Clerk's Office will notify the City Council liaison. However, if the person either fails to respond to the letter within 30 days or indicates that he is unable or unwilling to attend, the City Council liaison will be notified by the City Clerk's Office and the vacancy placed on the next possible City Council agenda for replacement. The appointment shall be for the duration of the unexpired term of the member whose position has been vacated.

Failure to observe any requirement of this policy shall not affect the validity or legality of any appointment.

This policy, adopted April 13, 2006 and amended December 11, 2006, supercedes previous board and commission policies.



City of Greenville, North Carolina

Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Appointment Reporting 2006-2007 County & Municipality Appointments Forms

Explanation: North Carolina General Statute 143-157.1 requires that the City Clerk's Office

report on the gender of appointments to certain boards and commissions by September 1. That information has been tallied in accordance with the Statutes, and the forms have been completed. The information has been submitted to Secretary of State Elaine Marshall, who will in turn forward this information to the Governor, Speaker of the House, and President Pro-Tem of the Senate. These forms, which are attached, provide gender information on

appointments made to certain Boards and Commissions by the Mayor and City

Council between July 1, 2006 and June 30, 2007.

Fiscal Note: None

Recommendation: Accept the Appointment Reporting 2006-2007 County & Municipality

Appointments Forms

Viewing Attachments Requires Adobe Acrobat. Click here to download.

Attachments / click to download

□ 2006-07 Appointment Reporting Forms

1 of 2

SOS revised 06/2007

North Carolina Department of the Secretary of State <u>Appointment Reporting 2006-2007 County & Municipality Appointments Form</u>

See second page for further filing instructions. Please provide the information requested below in Parts A, B and C (located on pages 1-2) as applicable to your county or municipality. Record information for appointments made/announced between July 1, 2006 and June 30, 2007 for the boards listed. Boards that do not receive appointments during this timeframe or are not applicable to your county or municipality should be left blank on the Appointment Reporting Form. Please use one form per Appointing Authority (i.e. a

A. Please list name of body/official (Appointing Authority) making appointments:	City of Greenville City Council City of Greenville City Council			
B. Report for the Following Boards (as applicable)	Total Number of Members of Board	Women Appointed July 1, 2006-June 30, 2007	Men Appointed July 1, 2006-June 30, 2007	Total Appointments July 1, 2006-June 30, 2007
Adult Care Home Community Advisory Committee	ī		`	
Airport Authority	8	0	3	3
Area Mental Health, Developmental		-		
Disabilities, & Substance Abuse Board Board of Adjustment	7	1 .	1	2
Board of Equalization & Review				
City Board of Education (if appointive)		<u> </u>	<u> </u>	
Civil Service Board Community Child Protection Team or Child Fatality Prevention Team				
Community College Board of Trustees			•	
Community Relations Committee				
Council of Governments				
County Board of Social Services				
County Industrial Facilities & Pollution Control Financing Authority				·
Criminal Justice Partnership Task Force				<u> </u>
Economic Development Commission				
Emergency Planning Committee			3	4
Historic Preservation Commission	10	1	<u> </u>	
Hospital Authority				
Housing Authority			5	8
Human Relations Commission	14	3	3	
Juvenile Crime Prevention Council				2
Library Board of Trustees	9	0	2	
Local ABC Board				<u> </u>
Local Board of Health				
Local Partnership for Children				
Local Tourism Development Authority			-	
Metropolitan Planning Organization				2
Planning and Zoning Board	9	0	2	4
Planning Board				
Public Transportation Authority	,			4
Recreation Board	9	1	3	2
Redevelopment Commission	7	1	1	<u> </u>
Rural Planning Organization				
Water and Sewer Authority				
Workforce Development Board			<u> </u>	<u> </u>
Zoning Board of Adjustment				<u> </u>

1 of 2

SOS revised 06/2007

North Carolina Department of the Secretary of State Appointment Reporting 2006-2007 County & Municipality Appointments Form

See second page for further filing instructions. Please provide the information requested below in Parts A, B and C (located on pages 1-2) as applicable to your county or municipality. Record information for appointments made/announced between July 1, 2006 and June 30, 2007 for the boards listed. Boards that do not receive appointments during this timeframe or are not applicable to your county or municipality should be left blank on the Appointment Reporting Form. Please use one form per Appointing Authority (i.e. a

A. Please list name of body/official (Appointing Authority) making	City of Greenville Mayor			
appointments: B. Report for the Following Boards (as applicable)	Total Number of Members of Board	Women Appointed July 1, 2006-June 30, 2007	Men Appointed July 1, 2006-June 30, 2007	Total Appointments July 1, 2006-June 30 2007
Adult Care Home Community Advisory	•			
Committee				
Airport Authority				
Area Mental Health, Developmental Disabilities, & Substance Abuse Board				
Board of Adjustment				
Board of Equalization & Review				
City Board of Education (if appointive)				
Civil Service Board				
Community Child Protection Team or Child Fatality Prevention Team				
Community College Board of Trustees				
Community Relations Committee				
Council of Governments				
County Board of Social Services				
County Industrial Facilities & Pollution Control Financing Authority				
Criminal Justice Partnership Task Force				
Economic Development Commission				
Emergency Planning Committee				
Historic Preservation Commission				
Hospital Authority				4
Housing Authority	7	0	4	4
Human Relations Commission				
Juvenile Crime Prevention Council				
Library Board of Trustees				
Local ABC Board				
Local Board of Health				
Local Partnership for Children				
Local Tourism Development Authority		-		
Metropolitan Planning Organization				
Planning and Zoning Board				
Planning Board				
Public Transportation Authority				
Recreation Board				
Redevelopment Commission				
Rural Planning Organization			•	
Water and Sewer Authority				
Workforce Development Board				
Zoning Board of Adjustment				

N.C.G.S. § 143-157.1 FORM

SOS revised 06/2007

2 of 2

N.C.G.S. § 143-157.1 FORM	
C. Name and Address of Person Filing	Attention Filer: Please provide the following information.
Information	Your name and title: Wanda T. Elks, City Clerk Address: Office of City Clerk, PO Box 7207, Greenville, NC 27835-7207 Telephone: (252) 329-4492 FAX: (252) 329-4399 County: Pitt Your e-mail: welks@greenvillenc.gov Org/Agency e-mail: www.greenvillenc.gov

Appointment Reporting For the Period July 1, 2006 – June 30, 2007 County and Municipality Filing Information

	The legislature ratified changes in this statute to provide further clarity. Changes in this
North Carolina	The legislature ratified changes in this statute to provide further charge of applicable hoards for
General Statute	statute for counties and municipalities include a master list of applicable boards for
Changes 143-	counties and municipalities and a new reporting timeline. You can view the changes made
157.1	to the statute at www.ncleg.net by searching for 2007 Session Law167 (or ratified House
Background	bill 824). General Statute 143-157.1 requires that certain appointing authorities report to
	the Department of the Secretary of State annually by September 1 the number and
	gender of appointments made during the preceding year. These reports are computed
	by our office and transmitted to the Governor and General Assembly. There is no filing
	fee requirement pursuant to this law.
Action Required	Please complete the information requested and return form(s) to:
[North Carolina Department of the Secretary of State
By September 1	Attention: Appointment Reporting
September 1,	PO Box 29622
<u>2007</u>	Raleigh, NC 27626-0622
	Forms can also be emailed to appoint@sosnc.com or faxed to (919) 807-2010.
	Please leave blank boards that are not applicable to your county or municipality or have
Further Filing	not received appointments during the designated time period of July 1, 2006-June 30,
Information	2007. No additional boards or commissions should be reported. Reappointments should
	2007. No additional boards of commissions should be reported. Reappointed
	be included as new appointments for the purpose of this form. Do not include appointments for alternate members or include alternate members in the total membership
	appointments for alternate memoers of include alternate memoers at the
	number for boards.
Questions?	Questions regarding whether this law applies to you (i.e., whether you should submit a
	report) should be directed to your legal counsel. Any questions regarding "how to file"
	may be directed to the Department of the Secretary of State at 919.007,2003, or by entant
	to appoint@sosnc.com



City of Greenville, North Carolina

Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Resolution accepting dedication of rights-of-way and easements for Cross Creek

Townhomes; Davencroft, Phase One; South Pointe, Sections 2 & 3; Vancroft Townhomes, Lot 104, Section 2; Vancroft, Section 2; Bedford, Section 10, Phase

2; and Taberna, Phase 3

Explanation: In accordance with the City's Subdivision regulations, rights-of-way and

easements have been dedicated for Cross Creek Townhomes (Map Book 67 at Page 195); Davencroft, Phase One (Map Book 67 at Pages 10-11); South Pointe, Sections 2 & 3 (Map Book 65 at Pages 185-186); Vancroft Townhomes, Lot 104, Section 2 (Map Book 66 at Pages 186-187); Vancroft, Section 2 (Map Book 66 at Pages 181-182); Bedford, Section 10, Phase 2 (Map Book 67 at Page 181); and Taberna, Phase 3 (Map Book 67 at Page 12). A resolution accepting the dedication of the aforementioned rights-of-way and easements is attached for City Council consideration. The final plats showing rights-of-way and

easements are also attached.

Fiscal Note: Funds for the maintenance of these rights-of-way and easements are included

within the FY 2007-2008 budget.

Recommendation: City Council adopt the attached resolution accepting dedication of rights-of-way

and easements for Cross Creek Townhomes; Davencroft, Phase One; South Pointe, Sections 2 & 3; Vancroft Townhomes, Lot 104, Section 2; Vancroft,

Section 2; Bedford, Section 10, Phase 2; and Taberna, Phase 3.

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Attachments / click to download

Cross Creek Map

Davencroft Map

- South Pointe Map

- August 2007 Right of Way and Easement Resolution 699761

RESOLUTION NO. 07 _____ A RESOLUTION ACCEPTING DEDICATION TO THE PUBLIC OF RIGHTS-OF-WAY AND EASEMENTS ON SUBDIVISION PLATS

WHEREAS, G.S. 160A-374 authorizes any city council to accept by resolution any dedication made to the public of land or facilities for streets, parks, public utility lines, or other public purposes, when the lands or facilities are located within its subdivision-regulation jurisdiction; and

WHEREAS, the Subdivision Review Board of the City of Greenville has acted to approve the final plats named in this resolution, or the plats or maps that predate the Subdivision Review Process; and

WHEREAS, the final plats named in this resolution contain dedication to the public of lands or facilities for streets, parks, public utility lines, or other public purposes; and

WHEREAS, the Greenville City Council finds that it is in the best interest of the public health, safety, and general welfare of the citizens of the City of Greenville to accept the offered dedication on the plats named in this resolution.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Greenville, North Carolina:

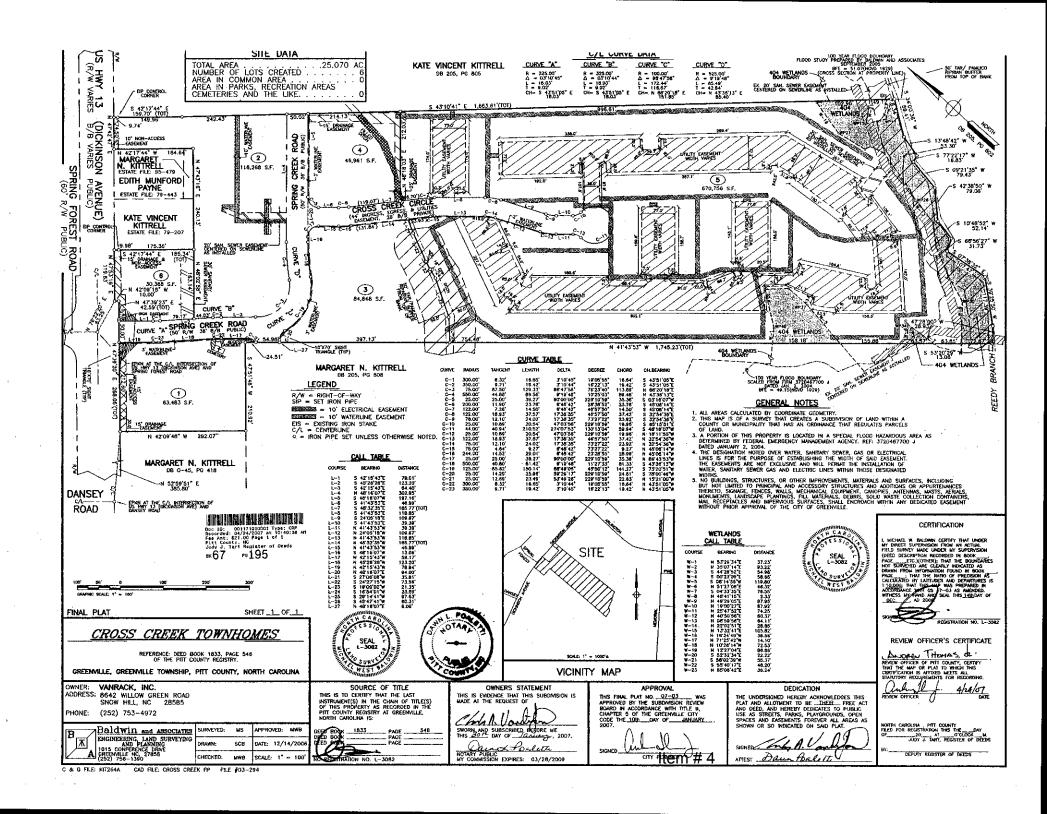
<u>Section 1</u>. The City of Greenville accepts the dedication made to the public of lands or facilities for streets, parks, public utility lines, or other public purposes offered by, shown on, or implied in the following approved subdivision plats:

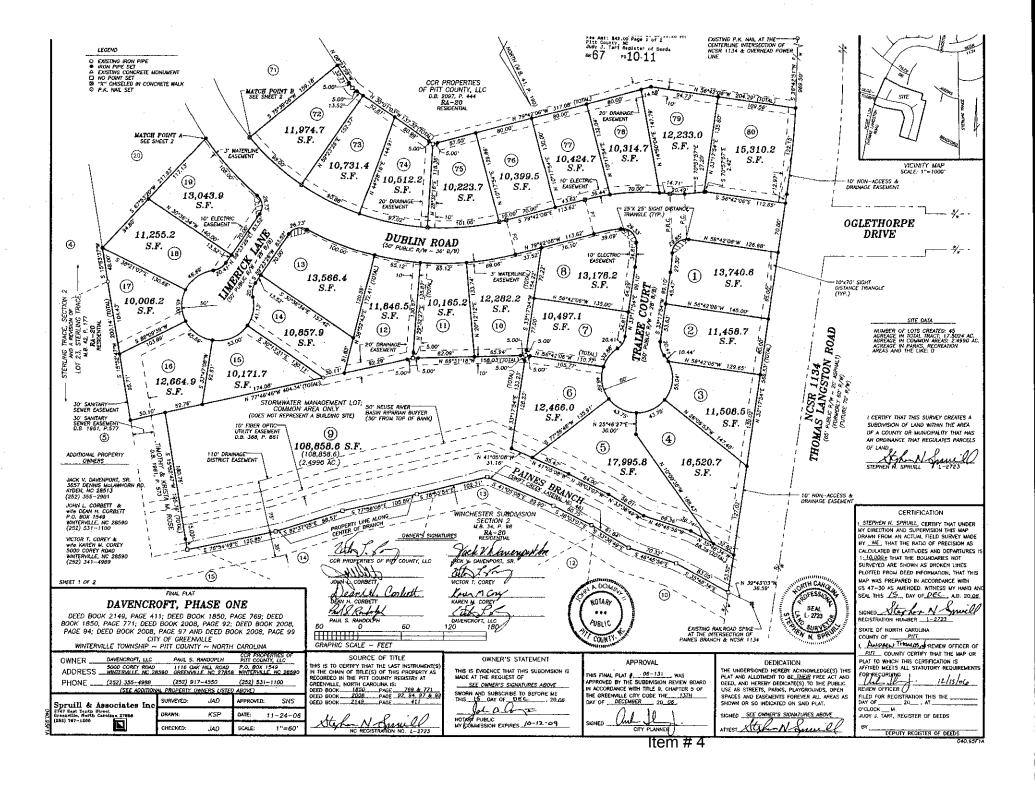
Cross Creek Townhomes	Map Book 67	Page 195
Davencroft, Phase One	Map Book 67	Pages 10-11
South Pointe, Sections 2 & 3	Map Book 65	Pages 185-186
Vancroft Townhomes, Lot 104, Section 2	Map Book 66	Pages 186-187
Vancroft, Section 2	Map Book 66	Pages 181-182
Bedford, Section 10, Phase 2	Map Book 67	Page 181
Taberna, Phase 3	Map Book 67	Page 12

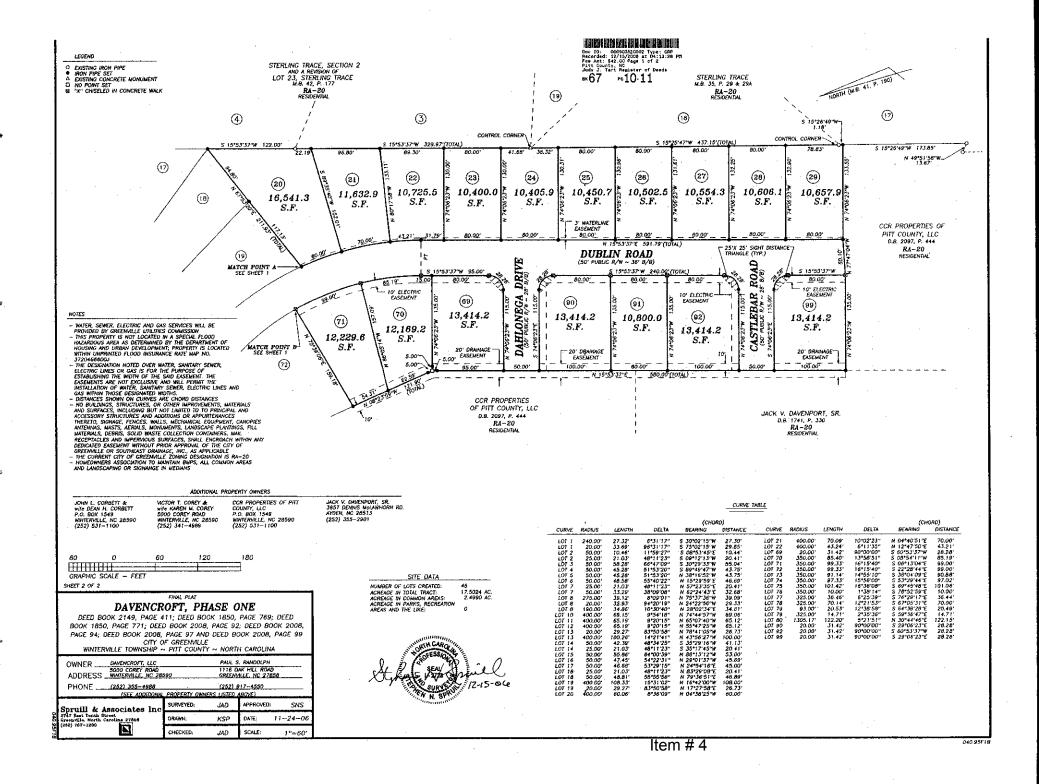
Section 2. Acceptance of dedication of lands or facilities shall not place on the City any duty to open, operate, repair, or maintain any street, utility line, or other land or facility except as provided by the ordinances, regulations or specific acts of the City, or as provided by the laws of the State of North Carolina.

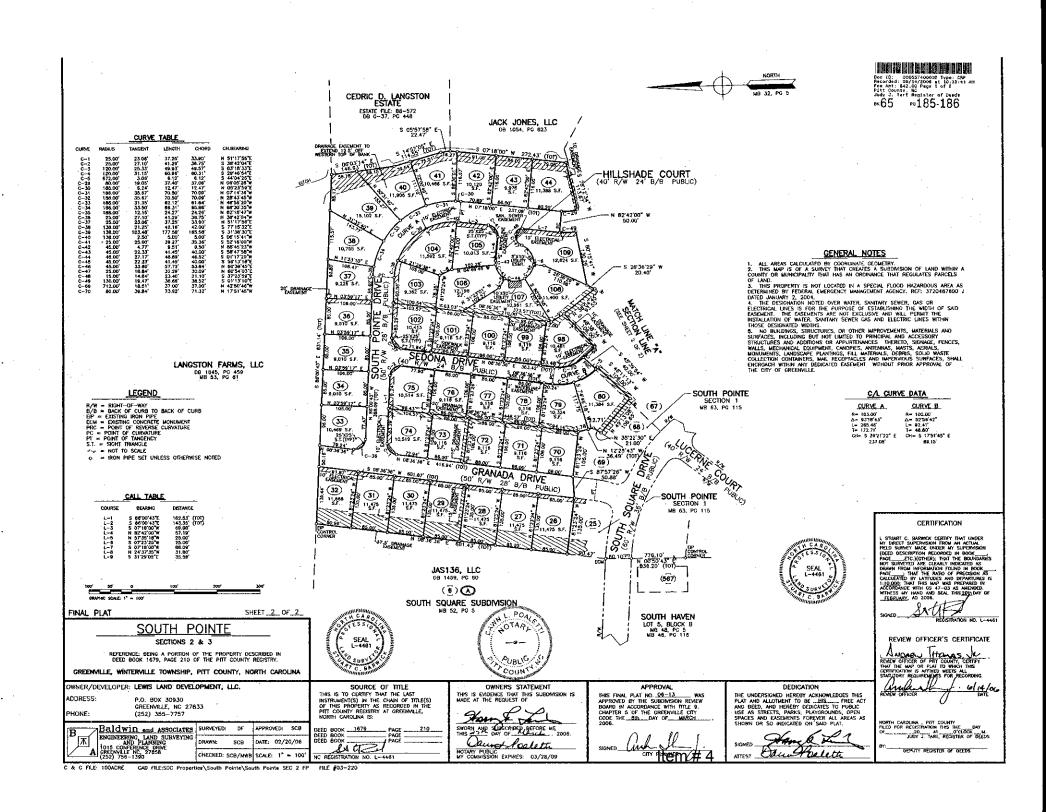
Section 3. Acceptance of the dedications named in this resolution shall be effective upon adoption of this resolution

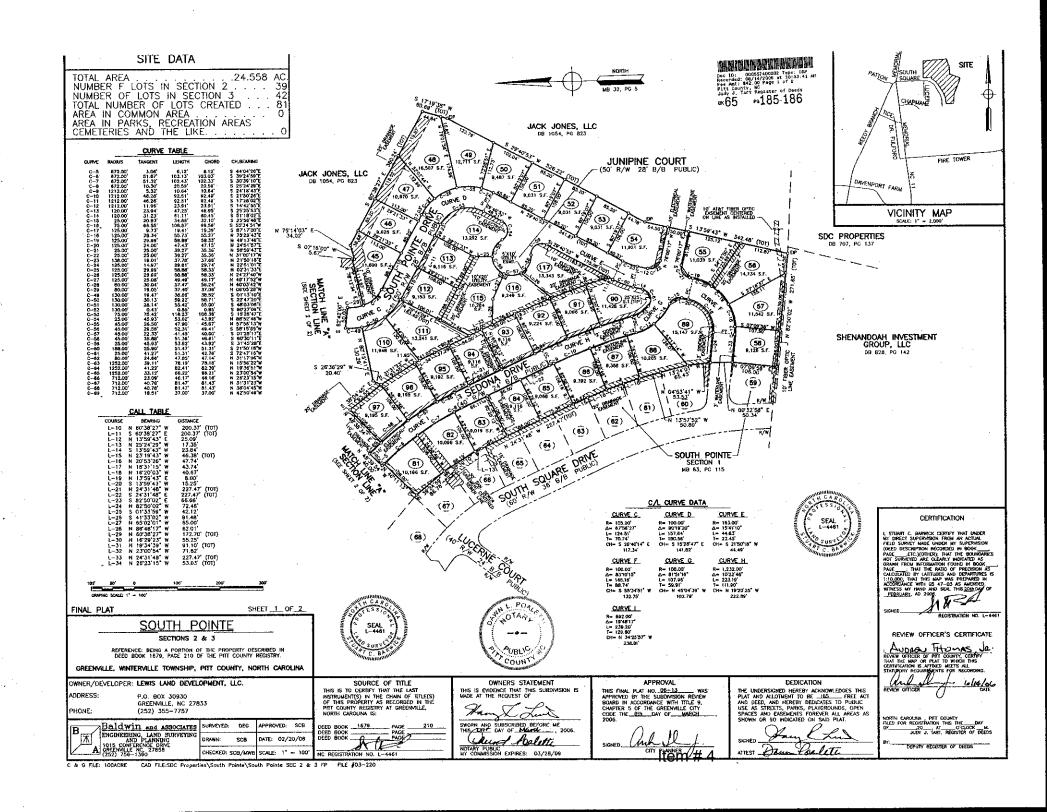
Adopted the 6 th day of August, 2007.
Robert D. Parrott, Mayor
ATTEST:
Vanda T. Elks, City Clerk
ORTH CAROLINA PITT COUNTY
I,, a Notary Public, do hereby certify that Wanda T. Elks, City Clerk, personally ppeared before me this day and acknowledged that she is the City Clerk of the City of Greenville, a nunicipality, and that by authority duly given and as the act of the municipality, the foregoing instrument was igned in its name by its mayor, sealed with the corporate seal, and attested by herself as its City Clerk.
WITNESS my hand and notarial seal this 6 th day of August, 2007.
Notary Public
My Commission Expires:

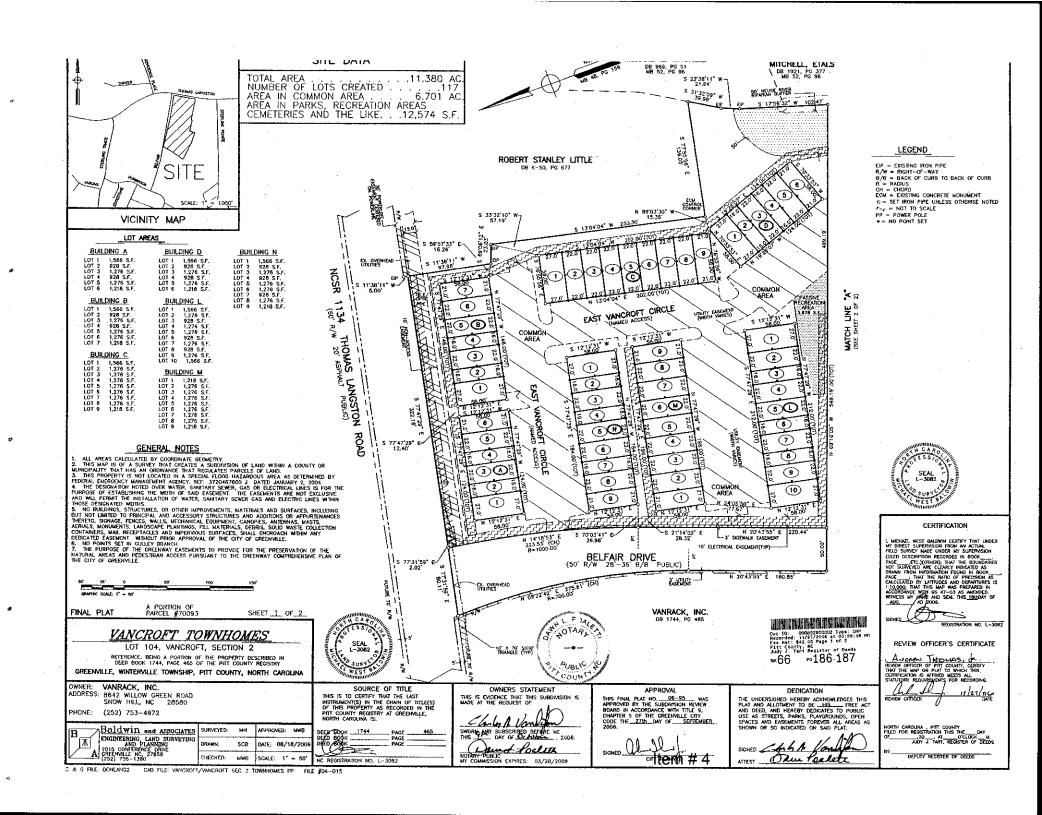


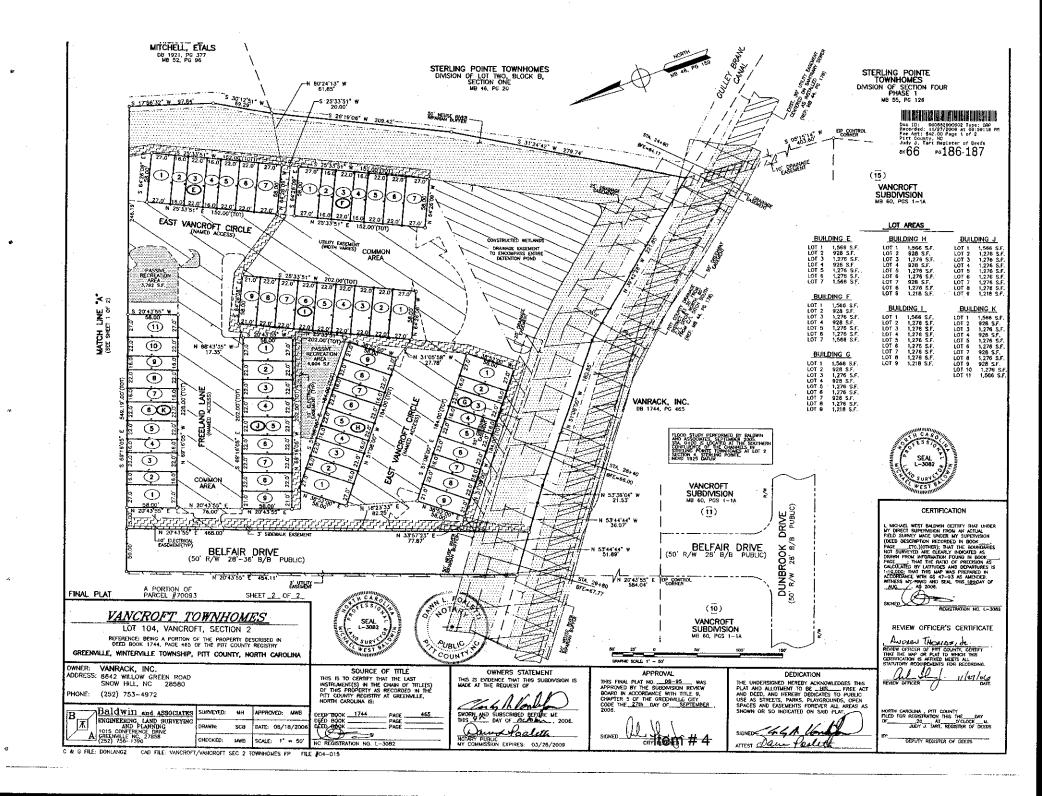


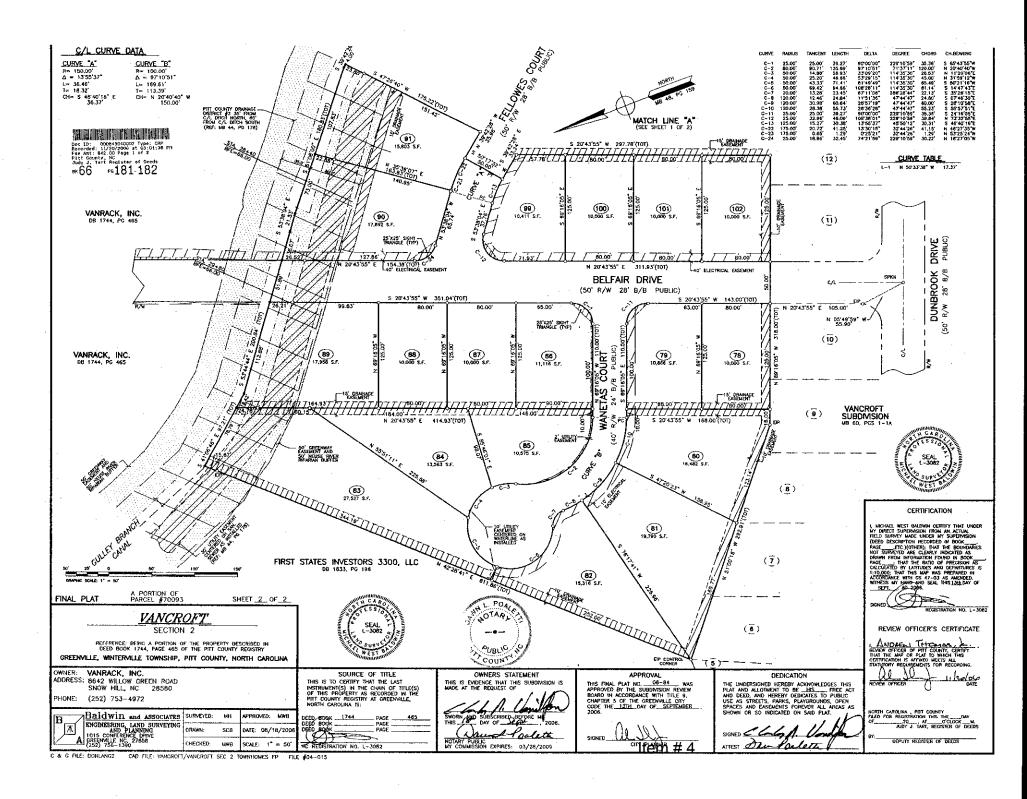


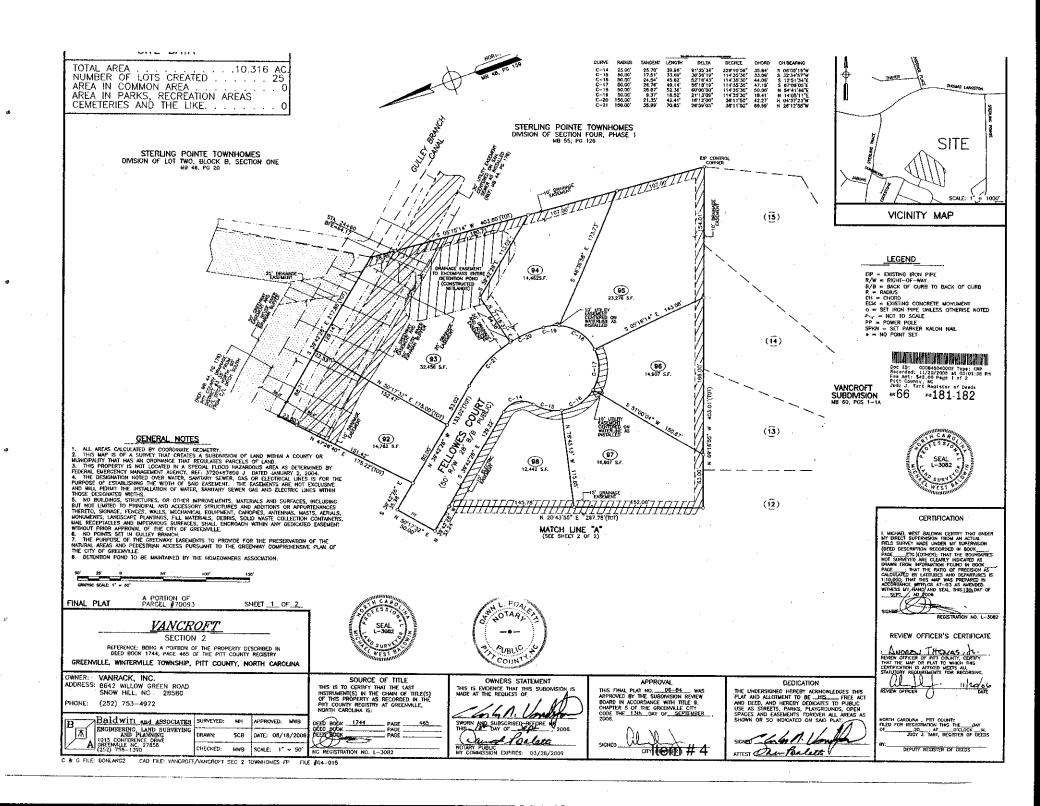


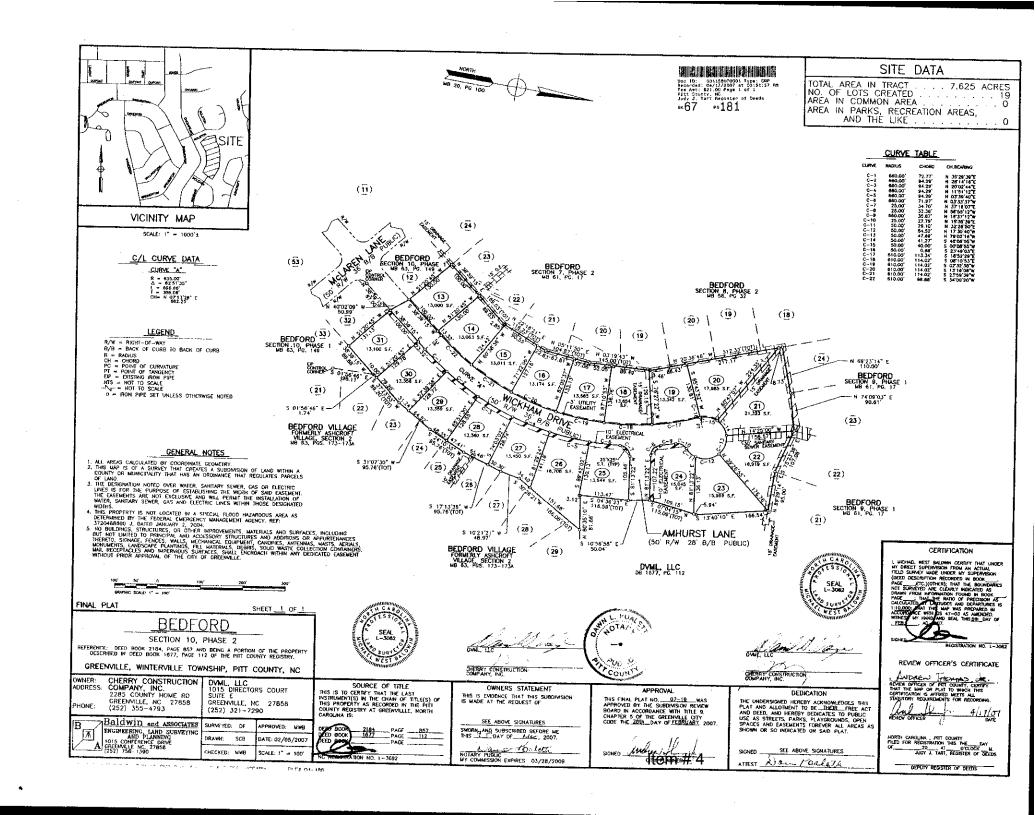


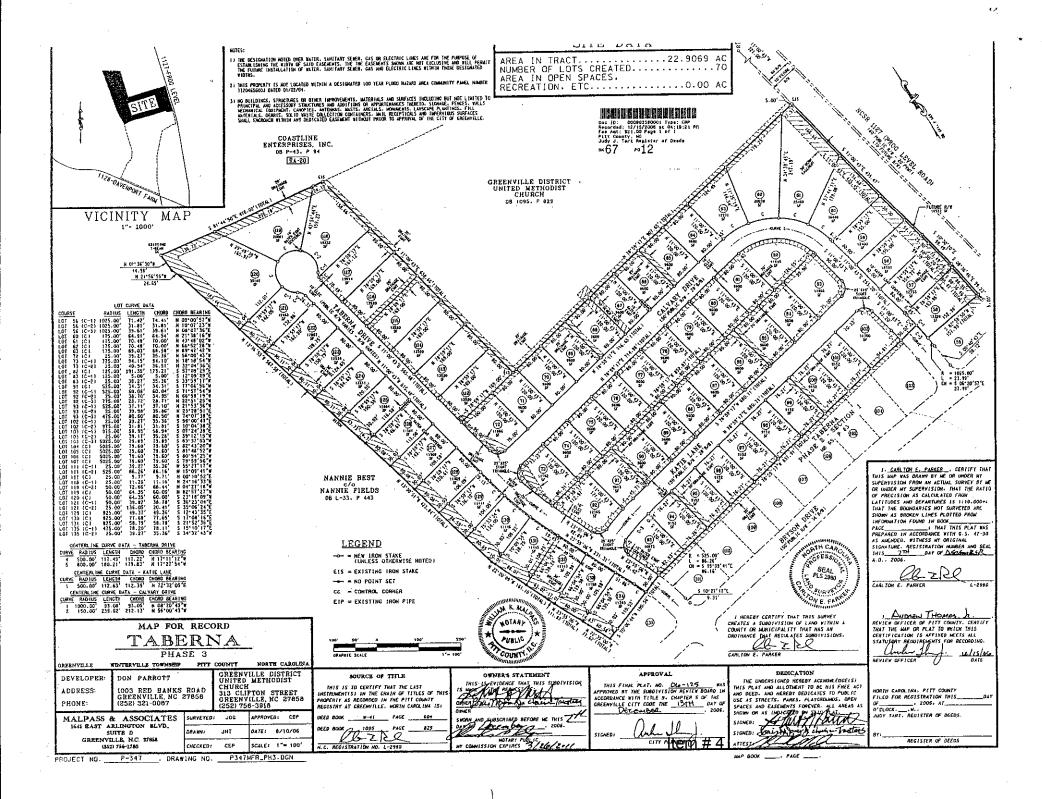














Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Contract award for Colonial Heights Drainage Improvements Project

Explanation:

Bids for the Colonial Heights drainage improvements project were received and opened on July 19, 2007. Attached is the bid tabulation. The lowest responsive bid was submitted by Burney & Burney Construction of Greenville, NC, in the amount of \$709,551.

This project involves upgrades of the storm drainage system within the Colonial Heights Subdivision off East Tenth Street. This project generally includes replacement and/or installation of approximately 3,925 LF of storm drainpipe and associated storm drain structures.

Greenville Utilities Commission (GUC) is proposing certain water and sewer utility improvements as a part of this project. GUC has agreed to fund this portion of work in the amount of \$38,209.

Fiscal Note:

Funding for this project will be provided through the General Obligation Bonds authorized in November 2004. The proposed budget for this project is as follows:

Expenditures

Construction Contract	\$709,551.00
Project Contingency (3%)	\$ 21,286.00
Total Project Cost	\$730,837.00

Revenues

2004 G.O. Bonds	\$692,628.00
GUC Reimbursements for Utility Adjustments	\$ 38,209.00
Total Project Revenues	\$730.837.00

Recommendation:

City Council award a construction contract for the Colonial Heights drainage improvements project to Burney & Burney Construction of Greenville, NC, in the amount of \$709,551.00.

Viewing Attachments Requires Adobe Acrobat. Click here to download.

Attachments / click to download

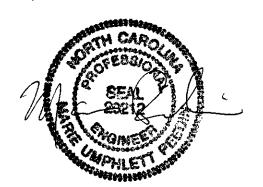
Oclonial Heights Bid Tab Sheet

COLONIAL HEIGHTS SUBDIVISION RE-BID DATE: JULY 19, 2007 at 2:00 p.m.

COLUMNAL HEIGH	0 000	N MOIOIAIC	C.DID	UAIE:	JULY	19, 200	07 at 2:00 p.m.		
CONTRACTORS	LIC. NO.	CLASS	BID BOND	ADD. 1	ADD. 2	MWBE	BASE BID	TOTAL BID	REMARKS
BURNEY & BURNEY									Apparent Low
CONSTRUCTION	30238	UNCL.	√	. √	$ \checkmark $	√	\$709,551.00	\$709,551.00	Bidder
HML CORPORATION	55210	UNCL.	√	$\Box \sqrt{}$		√	\$780,364.55	\$780,364.55	Diddel
GLOBAL CONSTRUCTION	40110	B, H, PU	V	V	√ .	V	\$861,827.00	\$861,827.00	Math Error
ATWELL CONST. CO.,		· · · · · · · · · · · · · · · · · · ·			<u> </u>		Ψουτ,υ27.00	\$001,027.00	\$861,227 Math Error
INC.	45324	UNCL.	√ .	√	√	. √	\$932,000.00	\$932,000.00	\$932,180
CHARLES HUGHES CONST. & REALTY	46169	B, H, PU	√	V	1	V	\$936,969.37	\$936,969.37	4002,100
LANIER								Ψοσο,σοσ.στ	_
CONSTRUCTION	18152	B, H, PU	V	V	1	√	\$942,950.48	\$942,950.48	ľ
COLT CONTRACTING COMPANY	27891	UNCL.	V	V	7	V	\$956,240.00		
BYRD BROTHERS,							φυσο,Σπο.σσ	\$956,240.00	
INC.	50039	UNCL.	√	√	. √	√	\$1,019,195.00	\$1,019,195.00	
EMPIRE CONSTRUCTION	54826	H, B, PU	V	٧_	√	V	\$1,166,018.00	\$1,166,018.00	
PETERS & WHITE							ψ1,100,010.00	\$1,100,010.00	
CONSTRUCTION .	12222	UNCL.	V	V	V	√	\$1,437,772.50	\$1,437,772.50	
ROBERSON CONTRACTING	50737								No Pid
ALLEN GRADING CO.,									No Bid
INC.	36649	B, H, PU						İ	No Bid
GREENVILLE PAVING & CONTRACTING	19366	UNCL							
									No Bid
									
									

This is to certify that the bids received herein were publicly opened and read at 2:00 p.m., on the 19th day of July, 2007, at the office of the Owner, the City of Greenville, 1500 Beatty Street, Greenville, North Carolina.

Marie U. Peedin, P. E.



Item #5



Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Contract award for Westhaven Drainage Improvements Project

Explanation: Bids for the Westhaven Drainage Improvements Project were received

and opened on July 19, 2007. Attached is the bid tabulation. The

lowest responsive bid was submitted by Charles Hughes Construction & Realty

of La Grange, NC, in the amount of \$359,411.29.

This project involves upgrades of the storm drainage system within the Westhaven Subdivision off Memorial Drive. This project generally includes replacement and/or installation of approximately 1,100 LF of storm drain pipe and associated storm drain structures, as well as cleaning and regrading 10,455

LF of existing open channels.

Fiscal Note: Funding for this project will be provided through the General Obligation Bonds

authorized in November 2004. The proposed budget for this project is as

follows:

Expenditures

Construction Contract \$359,411.29 Project Contingency (3%) \$10,782.33 Total Project Cost \$370,193.62

Revenues

2004 G. O. Bonds \$370,193.62 Total Project Revenues \$370,193.62

Recommendation: City Council award a construction contract for the Westhaven Drainage

Improvements Project to Charles Hughes Construction & Realty in the amount of

\$359,411.29.

Viewing Attachments Requires Adobe Acrobat. $\underline{\text{Click here}}$ to download.

Attachments / click to download

CONTRACTORS	LIC. NO.	CLASS	BID BOND	ADD. 1	ADD.	MWBE	BASE BID	TOTAL BID	DEMARKS
CHARLES HUGHES CONST. & REALTY	46169	B, H, PU	V	1	V	V	\$359,411.29		REMARKS Apparent Lov
CAROLINA EARTHMOVERS, INC.	38881	Н	1	V	V	V	\$376,176.91	\$359,411.29	Bidder
BURNEY & BURNEY CONSTRUCTION, INC.	30238	UNCL.	1	V	V	1	\$416,639.12	\$376,176.91 \$416,639.12	
ALLEN GRADING COMPANY, INC.	36649	В, н, ри	√	1	√	V	\$551,436.00		
GLOBAL CONSTRUCTION	40110	B, H, PU	V	1	V	1	\$570,994.00	\$551,436.00 \$570,994.00	
EMPIRE CONSTRUCTION	54826	H, B, PU	V	1	V	V	\$595,298.00		
CIESZKO CONSTRUCTION COMPANY	2775	UNCL.	V	7	V	1		\$595,298.00	
ATWELL CONST. CO., INC.	45324	UNCL.			<u> </u>	<u> </u>	\$720,686.00	\$720,686.00	-
LANIER CONSTRUCTION CO., INC.	18152	8, H, PU							No Bid
ROBERSON CONTRACTING, INC.	50737	UNCL							No Bid
REENVILLE PAVING & CONTRACTING	19366	UNCL.							No Bid
PETERS & WHITE CONSTRUCTION	12222	UNCL.							No Bid

This is to certify that the bids received herein were publicly opened and read at 3:00 p.m., on the 19th day of July, 2007, at the office of the Owner, the City of Greenville, 1500 Beatty Street, Greenville, North Carolina.





Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Police Department use of the Governor's Highway Safety Program law

enforcement liaison grant

Explanation: Sergeant Phil Worthington of the Traffic Safety Unit serves as the Regional

Coordinator for Region 1-B for the Governor's Highway Safety Program. This entitles the Greenville Police Department to receive \$10,000 in grant funds with no City match. Half the funds must be used to cover travel and related expenses

for Sergeant Worthington in the performance of his duties as Regional

Coordinator.

The remaining \$5,000 is for our agency to spend on traffic crash investigation and reconstruction againment or promotional mater

investigation and reconstruction equipment or promotional materials. The Police Department Traffic Safety Unit intends to spend the funds on an upgraded laser measurement and data collection device and a device to expedite setting up and leveling the laser measurement system. The Traffic Safety Unit also will purchase additional photogrammetry software that will allow investigators to include measurements in digital photos and create 3-D diagrams and overhead

views of accident scenes.

The equipment and technology is used primarily in the investigation of accidents

that result in serious injury or fatality.

Fiscal Note: \$10,000 revenue; expenditure of funds as detailed in the explanation.

Recommendation: Authorize the Police Department to accept these funds from the Governor's

Highway Safety Program and make the expenditures as detailed in the

explanation.

Viewing Attachments Requires Adobe Acrobat. Click here to download.



Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Report on bids awarded

Explanation: The Director of Financial Services reports that the following bids were awarded

in the months of May and June, 2007 and are to be included on the City Council

agenda for information.

Date Awarded	Description	Vendor	Amount	MWBE Yes/No
5/23/07	Replace Overhead Doors at Fleet Maintenance	East Carolina Overhead Doors, Inc.	\$67,720	No
6/04/07	Moseley Parking Lot Renovations	Moseley Construction Co.	\$67,461	No
6/26/07	10 Digital Eyewitness Camera Systems	B & G Electronics, Inc.	\$57,200	No
6/29/07	25 Panasonic Toughbook CF-30 Computers	CDW Government, Inc.	\$86,200	No

Fiscal Note: An expenditure of \$278,581 for these purchases was appropriated in the 2006-

2007 budget.

Recommendation: That the bid award information be reflected in the City Council minutes.

- Bid Tab Replace Overhead Doors in Fleet 707639
- Bid Tab Moseley Parking Lot Improvements 708018
- Bid Tab 10 Digital Eyewitness Camera Systems 707608
- Bid_Tab_25_Panasonic_Toughbook_Computers_707610

CITY OF GREENVILLE, NORTH CAROLINA FINANCIAL SERVICES/PURCHASING BID TABULATION

DESCRIPTION: Overhead garage door replacement, Fleet

May 7, 2007 @ 5:00 P.M.

BID OPENING DATE & TIME

COMPANY	BASE BID	ALTERNATE BID	DELIVERY DATE	COMMENTS
East Carolina Overhead Doors	\$48,450.00	Insulated heavy duty doors, \$67,720	3 Weeks Average	\$67,720.00 is recommended by Fleet
Action Overhead Door, Inc.	No bid	N/A		
Overhead Door Company	Received bid late, (5-9-07 by fax) \$52,128.00	N/A		Not complete or to specifications.
Rocky Mount Overhead Door Co.	No bid			

NOTE:

Low Bidder on base bid is East Carolina Overhead door. Overhead Door Company provided a late bid and was higher on the base bid. Also Overhead Door Company did not bid the correct size doors. We chose to go with the low bidder and upgrade to insulated heavy duty doors which still stays with-in budget.

 leet Superi	ntendent

BID TABULATION SHEET City of Greenville, North Carolina Financial Services Department

Description: Moseley Parking Lot Improvements

Bid Opening: January 16, 2007 - 2:00 p.m.

\$71,261.00 \$11,061.00 \$24,109.00 \$106,431.00 \$92,530.00 \$27,595.00 \$26,679.00 \$146,804.00 X		Rcv'd Add #1	μ, ρ,/					MWBE	BE
X \$71,261.00 \$11,061.00 \$24,109.00 \$106,431.00	Address	Yes	No	Base Bid	Alt G-1	Alt E-1	Total	_	No
X \$92,530.00 \$27,595.00 \$146,804.00 \$10,000 \$1		×		\$71,261.00	\$11,061.00	\$24,109.00	\$106,431.00		×
David T. Brown, City Engineer		×		\$92,530.00	\$27,595.00	\$26,679.00	\$146,804.00	×	
Date		1	Õ	avid T. Brown, Cit	y Engineer				
	Date	o.							

CITY OF GREENVILLE, NORTH CAROLINA FINANCIAL SERVICES DEPARTMENT

DESCRIPTION: 10 Digital Eyewitness Camera Systems

BID NO: Informal Bid#2006/07-52

DEPT.: Fire/Rescue

BID DATE: 3-31-07

COMPANY	BASE BID	ALTERNATE BID	DELIVERY DATE	BID BOND
Kustom Signals	\$57,870			
*** B & G Electronics	\$57,200			

	Purchasing Manager	-
	-	_
This bid was selected.		

doc#707608

CITY OF GREENVILLE, NORTH CAROLINA FINANCIAL SERVICES DEPARTMENT

DESCRIPTION: 25 Panasonic Toughbook CF-30

BID NO: Informal Bid#2006/07-53

DEPT.: Fire/Rescue

BID DATE: 5-15-07

COMPANY	DACE DID	AT TEDNIATE	DELIVEDY DATE	DID DOND
COMPANY	BASE BID	ALTERNATE BID	DELIVERY DATE	BID BOND
Computer Services America	\$86,766.25			
*** CDW Government Inc.	\$86,200.00			
Microage	\$92,746.00			

Purchasing Manager

Doc#707610



Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Various tax refunds

Explanation: The Director of Financial Services reports the refund of the following taxes:

Payee	Description	Amount
Joyce Hardee McRoy	Refund of City Taxes Paid	\$143.74
Sutton Service Center, Inc.	Refund of City Taxes Paid	\$240.59
Leigh Lennon McManus	Refund of City Taxes Paid	\$178.81
Bruce H. & Donna S. Simpkins	Refund of City Taxes Paid	\$132.55
Laura E. & Carlos M. Zambrano Peralty	Refund of City Taxes Paid	\$102.03
Rodney E. & Marie D. Jones	Refund of City Taxes Paid	\$148.58
Maxine A. Speight & Hilda Jones	Land valued incorrectly due to appraisal error for years: 2005, 2004, 2003	\$378.66

Fiscal Note: The total amount to be refunded is \$1,324.96.

Recommendation: Approval of tax refunds by City Council

Viewing Attachments Requires Adobe Acrobat. Click here to download.



Meeting Date: 8/6/2007 Time: 6:00 PM

Title of Item:

Resolution to close a portion of South Washington Street to Dickinson Avenue, a portion of West Sixth Street from South Washington Street to Evans Street, and Dickinson Avenue from South Washington Street to Reade Circle

Explanation:

During the May 7, 2007 meeting, City Council adopted a Resolution of Intent to Close a portion of South Washington Street from a point approximately 140.5 feet south of West Fifth Street to its intersection with Dickinson Avenue, a distance of approximately 160 feet. The resolution also identifies for closure a portion of West Sixth Street beginning at its intersection with South Washington Street to its intersection with Evans Street, a distance of approximately 305 feet and a portion of Dickinson Avenue from its intersection with Reade Circle to South Washington Street, a distance of approximately 361 feet. The resolution established June 14, 2007 as the public hearing date.

In accordance with State Statute, the Resolution of Intent was advertised in the Daily Reflector on four consecutive weeks (May 14, May 21, May 28, and June 4, 2007). Signs displaying the notice of a public hearing, the adopted Resolution of Intent, and a site map were posted on May 11, 2007 at prominent locations on each end of the street sections to be closed.

Attached is the resolution which contains the Order to Close the aforementioned portion of South Washington Street, West Sixth Street, and Dickinson Avenue. Also attached is a vicinity map that identifies these street segments.

The Order to Close the sections of South Washington, West Sixth Street, and Dickinson Avenue is contingent upon the following conditions and shall not become effective until both are met:

1) The recordation of the final plat for the Sixth Street Relocation Project in accordance with the provisions of the Subdivision Regulations for Greenville, North Carolina, said final plat to include the dedication of the necessary street right-of-way for the relocated Sixth Street from its intersection with Reade Circle at Dickinson Avenue to Evans Street, the necessary utility easements to accomplish the relocation of utilities in accordance with the requirements of

Section 14 of the Agreement dated April 12, 2007, between the City of Greenville and Jarvis Memorial United Methodist Church, and the ingress/egress easements in accordance with the requirements of Section 15 of the Agreement dated April 12, 2007, between the City of Greenville and Jarvis Memorial United Methodist Church.

2) The completion and acceptance of all improvements associated with the final plat for the Sixth Street Relocation Project in accordance with the Subdivision Regulations for Greenville, North Carolina, said improvements to include, but not be limited to, the relocated Sixth Street from its intersection with Reade Circle at Dickinson Avenue to Evans Street.

With construction of the relocated Sixth Street, the proposed closures of the sections of South Washington, West Sixth Street, and Dickinson Avenue are appropriate. The closures will result in changes in traffic patterns in the area.

City staff has reviewed the request and, based on input from all departments, there are no objections to the closing, subject to the conditions identified above being met. If it appears to the satisfaction of Council that closing the street is not contrary to the public interest and that no individual owning property in the vicinity of the streets or in the subdivision in which the streets are located would be deprived as a result of the closing of reasonable means of ingress or egress to the individual's property, the Council may adopt an order closing the street.

The public hearing was conducted as advertised on June 14, 2007, and at the conclusion of the public hearing the City Council carried the item over to August 6, 2007. The City Council further requested that City staff arrange a meeting with two representatives each from Jarvis Memorial United Methodist Church and Uptown Greenville to discuss the proposed street closings. As requested, City staff arranged a meeting for July 26, 2007. Jim Carter and Phil Flowers represented Jarvis Church. Ed Glenn and Eric Clark represented Uptown Greenville. The following City staff attended the meeting: City Manager Wayne Bowers, City Attorney Dave Holec, Public Works Director Tom Tysinger, and Community Development Director Merrill Flood. Library Director Willie Nelms also attended.

The Uptown Greenville representatives stated their position as follows: They support Jarvis Church being able to achieve its goals and prefer that these goals be achieved while keeping Dickinson Avenue/Washington Street open to traffic. Uptown Greenville does not object to closing West Sixth Street between Evans and Washington Streets.

The Jarvis Church representatives stated their position as preferring to close the subject streets as proposed in the agreement with the City and as presented at the public hearing. If the City Council does not close the specified streets, Jarvis Church would intend to develop their property as they now own it. While willing to listen to alternatives, they do not see a scenario that would be workable without removing Washington Street. They are still in agreement that Dickinson Avenue and Sixth Street should be replaced with a new street to maintain that flow of traffic and are willing to pay their portion of that expense as per the

agreement.

During the meeting, alternatives to the proposed street closings were discussed, but there was no agreement on any specific alternative. All of the participants stated their opinions during the meeting. At the conclusion of the meeting, the Jarvis Church representatives expressed their preference to proceed with the pending process to close portions of South Washington Street, Dickinson Avenue, and West Sixth Street.

After the conclusion of the public hearing on June 14, 2007, the City Council passed another motion to request City staff to look at additional funds that might go in to this street closing project. The current plan is to use the Center City Revitalization Bonds authorized by voters in 2004 to pay for the property acquisition and the infrastructure changes. A possible different revenue source would be to use funds in the capital reserve account designated for a future downtown parking garage to pay for some or all of the project costs. The capital reserve account has \$3,608,620 designated for a parking garage. One alternative would be to use a portion of these capital reserve funds (\$921,100) for acquiring the two parcels of land adjacent to the Library as this acquisition can be considered a general government expense as well as a Center City Revitalization project. Under this alternative \$832,455 would be charged to the bond funds. If the City Council desires to use a combination of bond and capital reserve funds, numerous other alternatives are possible for consideration.

Fiscal Note:

The City will no longer be responsible for the maintenance of the portions of South Washington Street, West Sixth Street, and Dickinson Avenue. There will be no significant fiscal impact to the City for these maintenance expenses.

Recommendation:

City Council consider the attached resolution ordering the closure of the specified portions of South Washington Street, West Sixth Street, and Dickinson Avenue.

Viewing Attachments Requires Adobe Acrobat. Click here to download.

- Jarvis City[1]
- Parallel Resolution to Close Sixth Street and a Portion of Washington Street and Dickinson Avenue 697172

RESOLUTION NO. 07-AN ORDER OF THE CITY COUNCIL OF THE CITY OF GREENVILLE, NORTH CAROLINA, TO CLOSE PORTIONS OF WASHINGTON STREET, WEST SIXTH STREET, AND DICKINSON AVENUE

WHEREAS, the City Council of the City of Greenville, at its May 7, 2007, meeting, adopted a resolution declaring its intent to close portions of Washington Street, West Sixth Street, and Dickinson Avenue;

WHEREAS, pursuant to the provisions of G.S. 160A-299, said resolution was published once a week for four (4) successive weeks in <u>The Daily Reflector</u> setting forth that a hearing will be held on the 14th day of June, 2007, on the question of the closing of the portions of said streets;

WHEREAS, a copy of the resolution was sent by certified mail to all owners of the property adjoining said portions of streets as shown on the County tax records and a notice of the closing and the public hearing was prominently posted in at least two (2) places along said portions of streets;

WHEREAS, a hearing was conducted on the 14th day of June, 2007, at which time all persons interested were afforded an opportunity to be heard on the question of whether or not the closing will be detrimental to the public interest or the property rights of any individual; and

WHEREAS, it appears to the satisfaction of the City Council of the City of Greenville, North Carolina, after conduction of said hearing, that the closing of portions of Washington Street, West Sixth Street, and Dickinson Avenue is not contrary to the public interest and that no individual owning property in the vicinity of said streets or in the subdivision in which said streets are located would thereby be deprived of reasonable means of ingress and egress to their property.

IT IS NOW, THEREFORE, ORDERED BY THE CITY COUNCIL OF THE CITY OF GREENVILLE that, upon the effective date of this Order, the property described below be and the same is closed, and all right, title and interest that may be vested in the public to said area for street purposes is released in accordance with the provisions of G.S. 160A-299:

Being a portion of S. Washington Street starting at a point 140.5 feet from the southern right of way of West Fifth Street to it intersection with Dickinson Avenue; and a portion of W. Sixth Street starting at the intersection with Evans Street running to the intersection with Washington Street;

and a portion of Dickinson Avenue starting at the intersection with the northeastern right of way Reade Circle to its intersection with W. Sixth Street being more particularly described as follows:

Beginning at a point in the eastern right of way of S. Washington Street (48' right of way), being an "X chiseled in the concrete sidewalk and being the common corner between the City of Greenville (Deed Book L-47, Page 206) and State of North Carolina properties (Deed Book 2007, Page 030), with said point being located as S 12°08"23" W - 140.51 feet from an "X" in the concrete sidewalk at the intersection of the southern right of way of West Fifth Street with the eastern right of way of S. Washington Street; thence from said located beginning point and running along the eastern right of way of S. Washington Street, S 12°07"08" W – 61.66 feet, to a point at the intersection with the northern right of way of W. Sixth Street; thence running along the northern right of way of W. Sixth Street (51' right of way), S 78°59"39" E – 284.51 feet, to a point in the western right of way of Evans Street; thence along a line crossing the right of way of W. Sixth Street, S $17^{\circ}08^{\circ}00^{\circ}$ W - 51.29 feet, to the intersection of the western right of way of Evans Street with the southern right of way of W. Sixth Street; thence running along the southern right of way of W. Sixth Street, N $78^{\circ}59^{\circ}38^{\circ}$ W - 213.10 feet to a point at the intersection with the southeastern right of way of Dickinson Avenue; thence running along the southeastern right of way of Dickinson Avenue (70' right of way), S 55°04"10" W – 360.46 feet, to a point in the curved eastern right of way of Reade Circle; thence running along the along the curved right of way of Reade Circle and crossing the right of way of Dickinson Avenue as measured along the chord, N 29°36"46" W - 70.30 feet to a point at the intersection of the curved eastern right of way of Reade Circle with the northwestern right of way of Dickinson Avenue; thence running along the northwestern right of way of Dickinson Avenue, N 55°04"10" E – 261.05 feet to a point at the intersection with the western right of way of S. Washington Street; thence running along the western right of way of S. Washington Street, N 12°04"34" E – 131.63 feet to a point; thence crossing the right of way of S. Washington Street along a line perpendicular to the western right of way of S. Washington Street, S 77°55"26" E - 48.01 feet to the point of BEGINNING and containing about 0.98 acres. The City reserves and excepts from this closing any portion of the aforedescribed area which is within the right of way for the relocated Sixth Street as shown on the final plat for the Sixth Street Relocation Project.

IT IS FURTHER ORDERED BY THE CITY COUNCIL OF THE CITY OF GREENVILLE that the City of Greenville does hereby reserve its right, title, and interest in any utility improvement or easement within the streets closed pursuant to this Order provided that said easement is reflected upon the final plat for the Street Relocation Project and said utility improvements are located within either the street right of way for the relocated Sixth Street or the easements reflected on the final plat for the Sixth Street Relocation Project. Such reservation also extends, in accordance with the provisions of G.S. 160A-299(f), to utility improvements or easements owned by private utilities which at the time of the street closing have a utility agreement or franchise with the City of Greenville.

IT IS FURTHER ORDERED BY THE CITY COUNCIL OF THE CITY OF GREENVILLE that this Order shall become effective when both of the following conditions are met:

1. The recordation of the final plat for the Sixth Street Relocation Project in accordance with the provisions of the Subdivision Regulations for Greenville, North Carolina, said final plat to include, but not limited to, the dedication of the necessary street right of way for the relocated

Sixth Street from its intersection with Reade Circle at Dickinson Avenue to Evans Street, the necessary utility easements to accomplish the relocation of utilities in accordance with the requirements of Section 14 of the Agreement dated April 12, 2007, between the City of Greenville and Jarvis Memorial United Methodist Church, and the ingress/egress easements in accordance with the requirements of Section 15 of the Agreement dated April 12, 2007, between the City of Greenville and Jarvis Memorial United Methodist Church; and

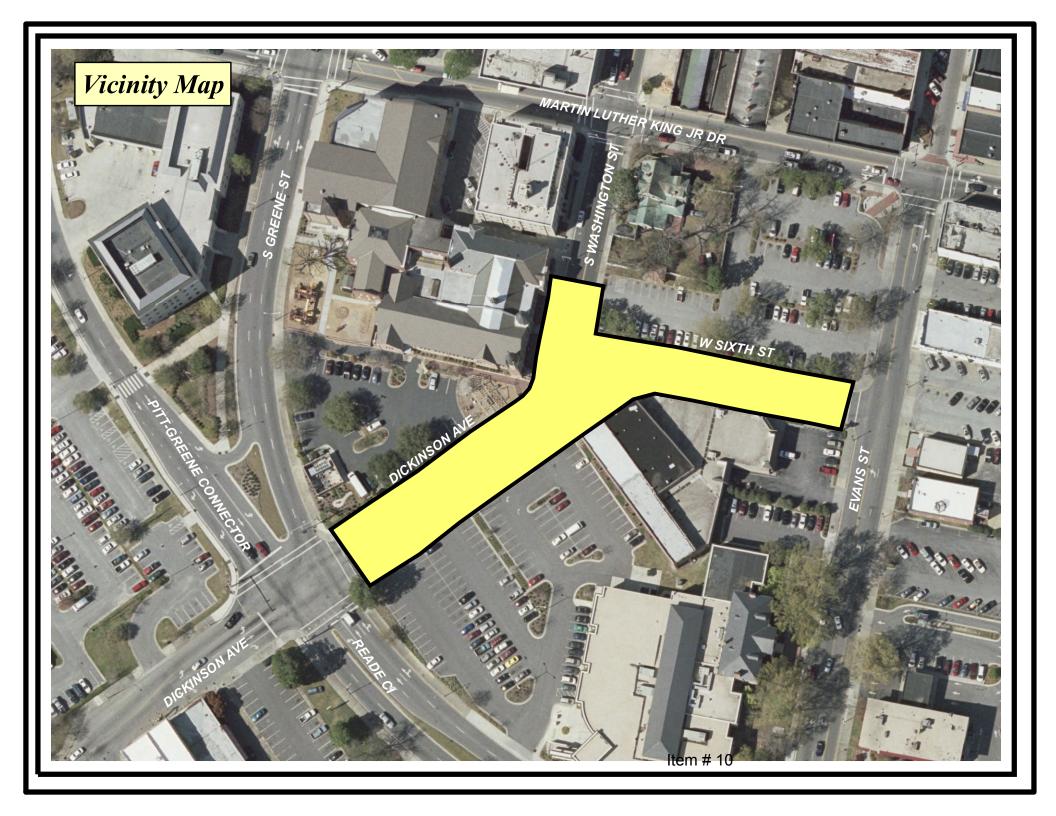
2. The completion and acceptance of all improvements associated with the final plat for the Sixth Street Relocation Project in accordance with the Subdivision Regulations for Greenville, North Carolina, said improvements to include, but not be limited to, the relocated Sixth Street from its intersection with Reade Circle at Dickinson Avenue to Evans Street.

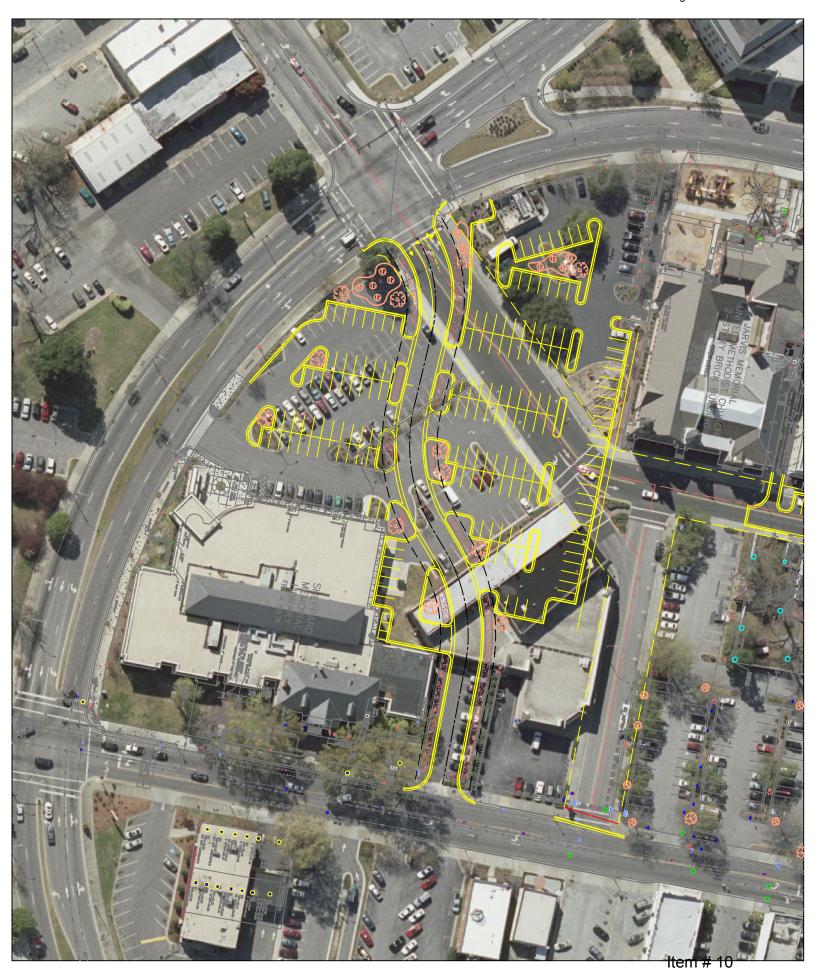
IT IS FURTHER ORDERED BY THE CITY COUNCIL OF THE CITY OF GREENVILLE that, upon the effective date of this Order, the Mayor and City Clerk are authorized to execute quit-claim deeds or other legal documents to prove vesting of any right, title or interest to those persons owning lots or parcels adjacent to the streets in accordance with G.S. 160A-299(c), provided all costs shall be paid by any adjoining landowner requesting such action, all documents must be approved by the City Attorney and all documents, when appropriate, must reserve to the City any easements retained by the City. The intent of this paragraph is to authorize the execution of quit-claim deeds when requested by adjacent property owners; however, none are required and this paragraph is not intended to alter the vesting of title by operation of law as established by G.S. 160A-299(c).

IT IS FURTHER ORDERED BY THE CITY COUNCIL OF THE CITY OF GREENVILLE that a copy of this Order shall be filed in the Office of the Register of Deeds of Pitt County after the effective date of this Order

	
	Robert D. Parrott, Mayor
ATTEST:	
ATTEST.	
Wanda T. Elks, City Clerk	
, ,	

This the 6th day of August 2007







Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Presentation by Boards and Commissions

a. Historic Preservation Commission

b. Housing Authority

Explanation: The Historic Preservation Commission and the Housing Authority will make

their annual presentations to City Council at the August 6, 2007 meeting.

Fiscal Note: N/A

Recommendation: No action recommended; for information only.

Viewing Attachments Requires Adobe Acrobat. Click here to download.



Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> Contract award for Sixth Street Relocation Project engineering design

Explanation:

As part of the land transaction with Jarvis Memorial United Methodist Church, the City agreed to undertake the demolition of portions of Sixth Street, South Washington Street, and Dickinson Avenue. In addition, the City is responsible for the design and construction of the new relocated Sixth Street.

It was further committed that the demolition of the existing streets and construction of the relocated Sixth Street would begin no later than December 2007 and be complete by December 2008.

In order to meet these commitments, it is recommended that The East Group be awarded a professional services contract for the design of the Sixth Street Relocation Project and associated parking lot improvements. The East Group has been working with Jarvis Church over the last several months assisting in the land planning that led to the property transaction between the Church and the City. The firm is most familiar with this project, having completed much of the needed land surveying and preliminary engineering necessary for the design of the project. The attached proposal includes a fee for this work of \$35,500. This fee is considered reasonable because of direct savings in surveying cost. The design work associated with this contract includes, but is not limited to, demolition of the existing streets and utilities in the area, the new Sixth Street, relocation of a major storm drain line, and modifications to the Sixth Street and Sheppard Memorial Library parking lots.

In order to legally award this contract without going through a qualification-based procurement process, City Council must adopt a resolution exempting this project from the statutory procurement process for architectural/engineering services. This is an authority granted to cities by statute provided that City Council adopts a resolution which includes the reasons and circumstances relating to the exemption. A proposed resolution is attached for consideration.

Fiscal Note:

The recommended design contract includes a fee of \$35,500. Center City Revitalization Bond Funds will be used for this project.

Recommendation:

It is recommended that City Council take the following actions:

- 1) Adopt the attached Resolution Exempting the Sixth Street Relocation Project from the Statutory Procurement Process for Architectural and Engineering Services and
- 2) Award a professional services contract to The East Group for the design of the Sixth Street Relocation Project in the amount of \$35,500.

Viewing Attachments Requires Adobe Acrobat. Click here to download.

- Sixth Street Proposal
- □ RESOLUTION EXEMPTING SIXTH STREET RELOCATION PROJECT FROM STATUTORY PROCUREMENT PROCESS 696447

RESOLUTION NO. 07-

RESOLUTION EXEMPTING THE SIXTH STREET RELOCATION PROJECT FROM THE STATUTORY PROCUREMENT PROCESS FOR ARCHITECTURAL AND ENGINEERING SERVICES

WHEREAS, the provisions of Article 3D of Chapter 143 of the North Carolina General Statutes establish a process for the procurement of architectural and engineering services from which particular projects may be exempted in the sole discretion of the unit of local government; and

WHEREAS, it is appropriate to exempt the Sixth Street Relocation Project from the statutory procurement process for architectural and engineering services since the plans for the project will need to be coordinated with the plans for the Jarvis Memorial United Methodist Church expansion project;

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Greenville that it does hereby exempt the Sixth Street Relocation Project from the statutory procurement process for architectural services in accordance with the provisions of Article 3D of Chapter 143 of the North Carolina General Statutes.

ATTEST:	Robert D. Parrott, Mayor
Wanda T. Elks. City Clerk	

Adopted this 6th day of August, 2007.



May 7, 2007 - R

City of Greenville C/o Mr. Tom Tysinger PUBLIC WORKS 1500 Beatty Street Greenville, NC 27834 **Corporate Office**

PO Box 7305 324 S. Evans Street Greenville NC 27835 www.eastgroup.com

Tel 252.758.3746

Fax 252.830.3954

Re: 6th Street Relocation Project

Dear Mr. Tysinger,

The East Group appreciates the opportunity to work with you on this project. I am pleased to offer you the following proposal that describes the engineering scope of work, lump sum and estimated Time & Expense fees. The project is described as the 6th Street Relocation Project in downtown Greenville, NC.

Project Description

The project proposal is based on sketch plans prepared during the negotiations related to land transfers with the City of Greenville and Jarvis UMC. (See Attachment labeled "SKETCH PLAN – 1")

Scope of Work

The scope of work for this project consists of the following task:

- General Demolition plan depicting pavements, concrete and utilities that will be removed or abandoned during construction.
- Development of Sketch Plan for street alignment and reconfiguration of City owned parking areas for approval by owner. (bill as Time & Expense, see estimated breakdown)
- Prepare and submit Site Plan for approval.
- Prepare and submit Grading, Drainage and Erosion Control Plan including relocated Storm Drainage Plan & Profile for approval.
- Prepare and submit Utility Plan depicting relocated or renovated water and sewer mains for approval.
- Development of miscellaneous details needed for construction.

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- Development of technical specifications to be included in the Project Manual.
- Preparation and submittal of development plans and associated permit applications to the Greenville Utilities Commission and the City of Greenville Planning Department for necessary reviews and approvals.
- Attendance of review and coordination meetings with the Owner & Contractor as required. (bill as Time & Expense, see estimated breakdown)
- Attendance of municipal meeting as required during design and construction phases. (bill as Time & Expense, see estimated breakdown)
- Response to comments generated by Owner and other review agencies.
- Construction cost estimating for budgeting purposes.
- Responses to RFQ's during the bidding process.
- Review of Shop Drawings and RFQ's during the construction phase.
- Periodic site inspections as needed to review Civil work being completed.
- Certifications of improvements as required at the conclusion of construction.
- Provide as-built/record drawings of relocated water, sanitary sewer and storm drainage piping and structures.

Assumptions and Clarifications

- Landscape Plan is not included in this proposal.
- Boundary and Topographic Surveys were previously completed by this office.
 No additional Survey Services are proposed.
- All permit and site plan submittal fees, storm-water offset payments, etc. as applicable will be paid by the owner.
- No survey/construction staking is included.
- No full-time inspection is proposed with this proposal.
- Erosion Control will be reviewed by NCDENR, Land Quality Section.
- Storm Water Management Plans will be reviewed by the City of Greenville.
- Time & Expense/Materials shall be subject to The East Group's Corporate Rate Schedule in effect at the time that services are rendered.

Estimated Fee Breakdown

Sketch Plan \$2,500
Meetings \$700

Total of Estimated Fees = \$3,200

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Project Fees

Based upon the above-summarized scope of services for this project and information provided by you, The East Group proposes a fee of *Thirty Five Thousand Five Hundred Dollars*, (\$35,500) including estimated Reimbursable fees of \$3,200 for professional engineering.

We anticipate having finalized "signed & sealed" drawings and permits ready for submittal no later than August 20, 2007

Any additions to the scope of work will require additional fee and time to complete. The East Group will notify you of any cost and schedule impacts concerning changes to the scope of work and obtain written approval from you before proceeding with any changes.

We appreciate the opportunity to present this proposal and look forward to working with you on this project. This proposal will be effective for 60 days.

If you agree with the terms of this proposal, please indicate acceptance by signing the attached Proposal and Acceptance and work Authorization Agreement, and returning a copy to us. If you require additional information, please call me at 252-758-3746, ext. 135.

Respectfully Submitted,

Howard G. Nichols,

Project Manager/Senior Civil Designer

Attachment:

Proposal Acceptance and Work Authorization

"Sketch - 1"

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PO Box 7305 • 324 Evans Street Greenville, North Carolina 27858 252-758-3746 • Fax: 252-830-3954

4225 Malsbary Road • Suite 207 Cincinnati, Ohio 45242 513-794-9797 • Fax: 513-936-6070

Attachment number 2 1504 Hw 7 49 45 4 west 6 Leesburg, GA 31763 229-639-1666 • Fax: 229-639-1103

Proposal Acceptance and Work Authorization Agreement

THIS AGREEMENT is entered into as of $\frac{3}{100}$	(date), between The East Group, P.	A. (East Group) of
324 South Evans Street, Greenville, North Carolina 27835, and	City of Greenville, NC	_ ("Client"). The
parties agree as follows:		
Services. East Group agrees to provide Client with and Client		
the attached Proposal, (TEG Project Ref#20060205 Number)	, titled Sketch Plan – 2 (downtown Gree	enville, NC)
6 th Street Relocation and 5-7-07 - R dated	(the "Proposal") for the project Proposal	described in the
(the "Project"). The services are provided for the sole benef Agreement.	fit of the Client. There are no third party	beneficiaries to this
Payment. Client agrees to pay for all services provided by accordance with the Proposal. Payment shall be due upon recelete fee of 1 1/2% per month on the outstanding balance on any	eipt of East Group's invoice. Client agrees	to pay East Group a
Terms and Conditions. This Agreement shall be subject to all conditions are expressly made a part of this Agreement and made as the Group pursuant to this Agreement.		
WITNESS the following signatures:		
The East Group, P.A.	Client: City of Greenville, NC	
By: Date: 3/27/97	Ву:	Date:
Signature	Signature	
Howard G. Nichols		
Printed Name	Printed Name	
Project Manager		
Title	Title	

Terms and Conditions

Site Operation/Permits. Client will arrange for East Group's right-of-entry to the Project site for the purpose of performing the agreed services. Client represents that it possesses or will secure the necessary temporary and permanent permits and licenses required for its activities at the site, including but not limited to, effluent, air or stream pollution permits and licenses, easements for permanent structures or permanent changes in existing facilities, unless specifically stated otherwise in the Proposal. The Client shall furnish structural, mechanical, chemical, air and water pollution tests, tests for hazardous materials, and other laboratory and environmental tests, inspections and reports required by law or the Proposal. The East Group shall be entitled to rely upon the accuracy and completeness of all tests, reports, drawings, or other information provided by the Client to East Group.

Instruments of Service. East Group will furnish deliverables, products, and supporting documents to the Client. All documents generated by East Group under this Agreement shall remain the sole property of East Group. Any unauthorized use or distribution of East Group's work shall be at Client's and recipient's sole risk and without liability to East Group. East Group shall retain a confidential file copy of its work product and related documents. Neither the Client, nor any other person or entity, may use any documents or information prepared by East Group for the Project in connection with any other project. To the fullest extent permitted by law, the Client shall indemnify and hold harmless East Group from and against any and all claims, suits, damages, losses, and expenses, including but not limited to attorneys' fees, arising out of or resulting from any use of any documents or information provided by East Group for this Project for any purpose, other than the use of the documents or information in connection with the execution of this Project.

Construction Safety/Means and Methods. East Group agrees to adhere to Client's safety policies, as communicated to the East Group in writing by the client, while at the project site if those policies are equivalent to or more stringent than East Group's own safety policy. East Group reserves the right to cease work in the event it encounters an unsafe or hazardous condition until such time as the condition is corrected. East Group shall not have control over or charge of and shall not be responsible for construction means, methods, techniques, sequences or procedures, or for safety precautions and programs in connection with construction of the Project, since these are solely the Construction Contractor's responsibility. East Group shall not be responsible for the Contractor's schedule or failure to carry out construction in accordance with the terms of the Contractor's contract with the Client.

Assignment. Neither Client nor East Group shall assign this Agreement without the written consent of the other.

Standard of Care. East Group will perform its services using that degree of care and skill ordinarily exercised under similar conditions by reputable members of East Group's profession practicing in the same or similar locality at the time of service. East Group makes no other warranties, either express or implied. Any oral or written representations to the contrary are hereby disavowed. No agent or employee of East Group has authority to provide any additional warranties of any sort beyond those provided in this Agreement.

Indemnity. East Group will indemnify and hold harmless the Client, up to the limit of the East Group's insurance coverage, against liability for claims, causes of action, demands or suits by third parties for bodily injury or damages to property arising out of the services performed by East Group under this Agreement to the extent such injuries or damages are caused solely by the negligent acts or omissions of the East Group, its officers or employees. East Group's obligations under this paragraph shall not extend to injuries caused by the negligent or intentional acts or omissions of the Client or any third party.

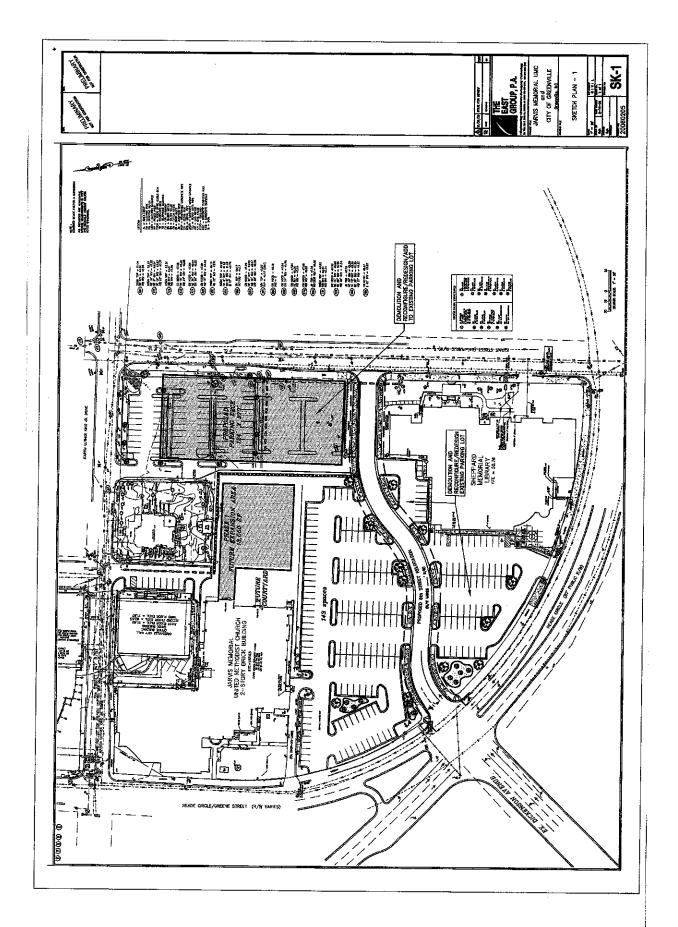
Limitation of Liability. East Group shall not be responsible for, and makes no representations regarding, the accuracy, completeness, or suitability of any work performed by any architect, engineer or other design consultant whose services are retained under separate contract with the Client or Owner.

Suspension/Termination of Agreement. If the Client fails to make payment when due East Group for services, East Group may, upon 7 days written notice to the Client, suspend performance of services under this Agreement, including issuance of any deliverables specified in the Proposal, until such time as the Client has paid all sums due and owing under this Agreement, or at its sole option, East Group may terminate this Agreement. In the event of a suspension of services or termination for failure to make payment, East Group shall have no liability to the Client or to any third party for any delay or damage caused by the suspension or termination of services. In the event East Group invokes its rights to terminate this Agreement, the Client shall be obligated to immediately pay East Group for all services performed up to the date of termination (which shall be seven days after the date of written notice of termination from East Group to Client), and all out-of-pocket expenses incurred by East Group in connection with its services. This provision in no way limits or reduces any other rights which East Group may have as a result of Client's failure to render payment in accordance with the terms of this Agreement

Conflict Resolution. The Client and East Group agree to work together to resolve any disputes arising out of or related to the Project or this Agreement, in a timely, professional and non-adversarial manner. If an issue arises which Project personnel of the Client and East Group are unable to resolve, the parties agrees that the issue shall be submitted to the designated higher level managers within the organizations of the Client and East Group for good faith discussion and negotiation. In the event that the designated higher level managers are unable to negotiate a resolution of such an issue, the matter shall be submitted for mediation. If still not resolved, the parties agree that the dispute shall be submitted for final decision by binding arbitration. Both mediation and arbitration shall be under the rules of American Arbitration Association's then-current Construction Industry Mediation and Arbitration Rules. The arbitration panel shall be made-up of three arbitrators. Each party shall choose one and the third to be agreed upon by both parties. Mediation and arbitration shall be conducted in Greenville, North Carolina.

Governing Law. This Agreement shall be governed in all respects by the laws of the State of North Carolina.

Entire Agreement. This Agreement represents the entire and integrated agreement between the Client and East Group and supersedes all prior negotiations, representations, or agreements, either written or oral. This Agreement may be amended only by written instrument signed by both Client and East Group. No waiver of any provision of this Agreement shall be deemed, or shall constitute, a waiver of any other provisions, whether or not similar, nor shall any waiver constitute a continuing waiver. No waiver shall be binding unless executed in writing by the party making the waiver.





City of Greenville, North Carolina

Meeting Date: 8/6/2007 Time: 6:00 PM

<u>Title of Item:</u> National Community Reinvestment Coalition report on lending in metropolitan

areas

Explanation: Last month the National Community Reinvestment Coalition issued the attached

report entitled "Income is No Shield Against Racial Differences in Lending: A Comparison of High-Cost Lending in America's Metropolitan Areas." Mayor Pro-Tem Council and Council Member Glover requested that copies of the report be distributed to all members of the City Council and that the report be placed on the next Council agenda for discussion. Copies of the report were sent

to the Mayor and Council on July 25, 2007.

Fiscal Note: No fiscal impact to the City.

Recommendation: City Council discuss the National Community Reinvestment Coalition report.

Viewing Attachments Requires Adobe Acrobat. Click here to download.

Attachments / click to download

National Community Reinvestment Coalition report

Income is No Shield

Against Racial Differences in Lending:

A Comparison of High-Cost Lending in America's Metropolitan Areas

July 2007



The National Community Reinvestment Coalition

The National Community Reinvestment Coalition (NCRC) is the nation's trade association for economic justice whose members consist of local community based organizations. Since its inception in 1990, NCRC has spearheaded the economic justice movement. NCRC's mission is to build wealth in traditionally underserved communities and bring low- and moderate-income populations across the country into the financial mainstream. NCRC members have constituents in every state in America, in both rural and urban areas.

The Board of Directors would like to express their appreciation to the NCRC professional staff who contributed to this publication and serve as a resource to all of us in the public and private sector who are committed to responsible lending. For more information, please contact:

John Taylor, President and CEO
David Berenbaum, Executive Vice President
Joshua Silver, Vice President, Policy and Research
Anna Gullickson, Research Analyst

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<u>Table of Contents</u> Income is No Shield Against Racial Differences in Lending

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Executive Summary

A looming foreclosure crisis confronts America as lending institutions have engaged in new forms of dangerous high-cost lending. Most of the high-cost or subprime lending made in recent years feature adjustable rate mortgages (ARMs) with low "teaser" rates for the first few years followed by rapidly rising rates. Incredibly, many lenders assessed borrowers' abilities to repay only at the low teaser rates. These loose underwriting standards have created the conditions for a perfect storm as almost 2 million of the ARM loans will re-set or start adjusting upward from their initial rates in 2007 and 2008. While they were slow to act, the federal regulatory agencies have finally raised the alarm and are now advising lenders to reform their underwriting practices.

In the backdrop of the risky high-cost lending practices, NCRC observes striking racial disparities in high-cost lending. If a consumer is a minority, particularly an African-American or a Hispanic, the consumer is most at risk of receiving a poorly underwritten high-cost loan. In addition, middle-class or upper-class status does not shield minorities from receiving dangerous high-cost loans. In fact, NCRC observes that racial differences in lending increase as income levels increase. In other words, middle- and upper-income (MUI) minorities are more likely relative to their MUI white counterparts to receive high-cost loans than low- and moderate-income (LMI) minorities are relative to LMI whites. Mainstream media has taken notice of the predatory lending plague afflicting middle-class minority communities. For example, the Wall Street Journal recently wrote a poignant and detailed article describing widespread foreclosures due to predatory lending in Detroit's middle-income African-American communities.²

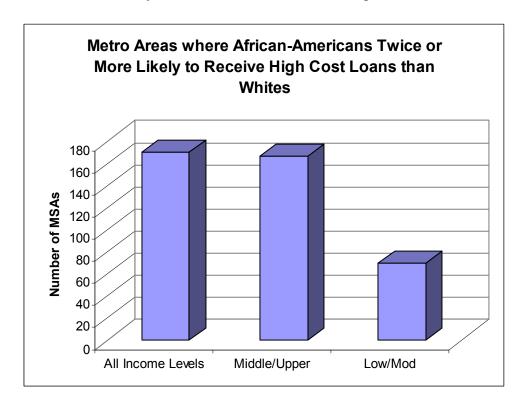
NCRC has always said that responsible high-cost lending serves legitimate credit needs. High-cost loans compensate lenders for the added risk of lending to borrowers with credit imperfections. However, wide differences in lending by race, even when accounting for income levels, suggests that more minorities are receiving high-cost loans than is justified based on creditworthiness. Previous studies by NCRC and others suggest that minorities are, in fact, receiving a

¹ "Regulators are Pressed to Take Tougher Stand on Mortgages," by Gregg Hitt and James R. Hagerty, Wall Street Journal, March 23, 2007

² Mark Whitehouse, "A Day of Reckoning Subprime Aftermath: Losing the Family Home – Mortgages Bolstered Detroit's Middle Class Until Money Ran Out," Wall Street Journal, May 30, 2007, page A1.

disproportionately large amount of high-cost loans, after controlling for creditworthiness and other housing market factors. When minorities receive a disproportionate amount of high-cost loans, they lose substantial amounts of equity through higher payments to their lenders. In addition, they are more exposed to irresponsibly underwritten ARM loans.

The lending disparities for African-Americans were large and increased significantly as income levels increased. African-Americans of all income levels were twice as likely or more than twice as likely to receive high-cost loans as whites in 171 metropolitan statistical areas (MSAs) during 2005, the most recent year for which publicly reported loan data on an industry-wide basis is available. MUI African-Americans were twice as likely or more than twice as likely to receive high-cost loans as MUI whites in 167 MSAs. In contrast, LMI African-Americans were twice as likely or more than twice as likely to receive high-cost loans as LMI whites in 70 MSAs. Moreover, MUI African-Americans receive a large percentage of high-cost loans. In 159 metropolitan areas, more than 40% of the loans received by MUI African-American were high-cost loans.



Hispanics also experienced greater disparities in high-cost lending compared to whites as income levels rose. LMI Hispanics were twice or more likely to receive high-cost loans than LMI whites in 10 MSAs. MUI Hispanics were twice or more likely to receive high-cost loans than MUI whites in 75 MSAs. In addition, the

percentage of high-cost loans received by MUI Hispanics was high. For MUI Hispanics, more than 40% of the loans received were high-cost in 71 MSAs and more than 30% of the loans received were high-cost in 137 MSAs. The study also serves as a valuable resource for all stakeholders by depicting high-cost lending trends overall and by race in every metropolitan area in America. The study finds that African-Americans experienced large lending disparities in Southern and mid-west MSAs and also in New England MSAs. For Hispanics, the West and Midwest MSAs exhibited high-disparities, and, surprisingly, so did New England MSAs. West coast MSAs exhibited the widest disparities for Asians.

When considering overall racial disparities, NCRC finds that the ten worst MSAs for lending disparities are (in descending order) Charleston, SC; Bridgeport, CT; Omaha, NE; Milwaukee, WI; Springfield, MA; Minneapolis-St. Paul, MN; Philadelphia, PA; Trenton, NJ; Birmingham, AL; and Greenville, SC.

Since racial disparities have been stubborn and persistent over several years, NCRC calls upon all stakeholders to enact bold programmatic and policy reforms. Community groups and financial institutions should engage in more partnerships to devise counseling programs and lending products that are fairly priced and affordable for minorities and working class Americans. Congress must pass a comprehensive anti-predatory law that prohibits steering or price discrimination and that outlaws a range of equity-stripping and abusive practices. Senator Schumer's bill (S. 1299 or the Borrower's Protection Act of 2007) is an excellent start for an anti-predatory lending bill. Congress must also pass the Community Reinvestment Modernization Act of 2007 (H.R. 1289) that would strengthen the Community Reinvestment Act (CRA) and thus encourage more prime or market-rate lending to minorities. Finally, federal and state regulatory agencies must significantly bolster the rigor of their anti-predatory and fair lending enforcement.

Literature Review and Introduction

A substantial body of research documents significant disparities in loan pricing based on the race, age, and income levels of neighborhood residents. These disparities are due to a combination of discrimination, market failure, and a variety of other factors.³ Discrimination and market failure impedes wealth

³ The disparities discussed in this report reflect a number of factors including income, wealth, credit rating, and many others. Discrimination, of course, remains a significant factor. Several studies discussed below have found that even controlling on credit-related factors, disparities persist. The disparities in this report do not necessarily reveal levels of discrimination in the marketplace; but they do reveal the presence of ongoing barriers associated with socioeconomic factors.

building and the creation of sustainable homeownership opportunities for residents of traditionally underserved neighborhoods.

Significant disparities in loan pricing reflect the growth of subprime lending. A subprime or high-cost loan has an interest rate higher than prevailing and competitive rates in order to compensate for the added risk of lending to a borrower with impaired credit. NCRC defines a predatory loan as an unsuitable loan designed to exploit vulnerable and unsophisticated borrowers. Predatory loans are a subset of subprime and non-traditional prime loans. A predatory loan has one or more of the following features: 1) charges more in interest and fees than is required to cover the added risk of lending to borrowers with credit imperfections, 2) contains abusive terms and conditions that trap borrowers and lead to increased indebtedness, 3) does not take into account the borrower's ability to repay the loan, and 4) violates fair lending laws by targeting women, minorities and communities of color.

Lending discrimination in the form of steering high cost loans to underserved borrowers qualified for market rate loans results in equity stripping and has contributed to inequalities in wealth. According to the Federal Reserve Survey of Consumer Finances, the median value of financial assets was \$38,500 for whites, but only \$7,200 for minorities in 2001. Whites had more than five times the dollar amount of financial assets than minorities. Likewise the median home value for whites was \$130,000 and only \$92,000 for minorities in 2001. By 2004, the Federal Reserve Survey of Consumer Finances reports the median net worth of minorities was 17.6% of that for all other families. In addition, the median net worth for African-Americans was virtually the same at \$20,400 in 2004 as it was in 2001 (\$20,300).

Since subprime loans often cost \$50,000 to \$100,000 more than comparable prime loans, a neighborhood receiving a disproportionate number of subprime loans loses a significant amount of equity and wealth. Using a mortgage calculator from Bankrate.com, a \$140,000 30-year mortgage with the current

⁴ A non-traditional loan is a loan that does not have a standard fixed-rate interest rate and/or does not have a traditional 30-year term. An example of a non-traditional loan is an interest-only loan in which the borrower only has to make interest payments during a specified time period of the loan. An option ARM loan features a number of payment options; under one option the borrower does not even have to pay the monthly interest that is due. A substantial number of subprime loans are non-traditional loans but so are a significant number of prime loans. Option ARM loans, for example, are almost always prime loans.

⁵ Ana M. Aizcorbe, Arthur B. Kennickell, and Kevin B. Moore, *Recent Changes in U.S. Family Finances: Evidence from the 1998 and 2001 Survey of Consumer Finances*, Federal Reserve Bulletin, January 2003.

⁶ Brian K. Bucks, Arthur B. Kennickell, and Kevin B. Moore, *Recent Changes in U.S. Family Finances: Evidence from the 2001 and 2004 Survey of Consumer Finances*, Federal Reserve Bulletin, March 2006.

prime rate of 6.25% costs about \$862 a month or about \$310,320 over the life of the loan. In contrast, a 30-year subprime loan with an interest rate of 8.25% costs \$1,052 a month or approximately \$378,637 over the life of the loan. The difference in total costs between the 6.25% and 8.25% loan is \$68,317. Finally, a 30-year subprime loan at 9.25% costs \$1,152 per month and \$414,630 over the life of the loan. The difference in total costs between a 6.25% and 9.25% loan is \$104,310. For a family who is creditworthy for a prime loan but receives a subprime loan, the total loss in equity can be easily between \$50,000 and \$100,000. This amount represents resources that could have been used to send children to college or start a small business. Instead of building family wealth, the equity was transferred from the family to the lender.

Building upon this example, the equity drain from a neighborhood can be tremendous. Suppose 15 percent or 300 families in a predominantly minority census tract with 2,000 households receive subprime loans although they were creditworthy for prime loans (15 percent of families that are inappropriately steered into subprime loans is a realistic figure based on existing research). Further, assume that these families pay \$50,000 more over the life of the loan than they should (the \$50,000 figure is conservative based on the calculations immediately above). In total, the 300 families in the minority census tract have paid lenders \$15 million more than they would have if they had received prime loans for which they could have qualified. The \$15 million in purchasing power could have supported stores in the neighborhood, economic development in the neighborhood, or other wealth building endeavors for the families and neighborhood. For even one neighborhood, the magnitude of wealth loss due to pricing disparities and/or discrimination is stark. Across the country, the wealth loss is staggering and tragic.

In the *Broken Credit System* study released in early 2004, NCRC selected ten large metropolitan areas for the analysis: Atlanta, Baltimore, Cleveland, Detroit, Houston, Los Angeles, Milwaukee, New York, St. Louis, and Washington DC. NCRC obtained creditworthiness data on a one time basis from a large credit bureau. As expected, the number of subprime loans increased as the amount of neighborhood residents in higher credit risk categories increased. After controlling for risk and housing market conditions, however, the race and age composition of the neighborhood had an independent and strong effect, increasing the amount of high cost subprime lending. In particular:

• The level of refinance subprime lending increased as the portion of African-Americans in a neighborhood increased in nine of the ten metropolitan areas. In the case of home purchase subprime lending, the African-American composition of a neighborhood boosted lending in six metropolitan areas.

• The impact of the age of borrowers was strong in refinance lending. In seven metropolitan areas, the portion of subprime refinance lending increased solely when the number of residents over 65 increased in a neighborhood.

Another NCRC study, Fair Lending Disparities by Race, Income and Gender in all Metropolitan Areas in America (spring 2005), reveals striking lending disparities across the great majority of the 331 metropolitan areas in the United States. Specifically, minorities, women, and low- and moderate-income borrowers received a disproportionate share of subprime loans relative to prime loans. Lending disparities were compared to the level of segregation controlling for housing affordability across metropolitan areas. As segregation increased, the portion of subprime loans to African-Americans, Hispanics, and minority tracts increased faster than prime lending to these tracts. A segment of subprime lenders is targeting segregated neighborhoods with high cost loans.

In another study conducted in 2006, *Homeownership and Wealth Building Impeded*, NCRC found that racial disparities in the share of borrowers receiving high-cost loans were greater for upper-income borrowers than lower-income borrowers across the nation. High-cost loans made up a high 41.9 percent of all refinance loans to low- and moderate-income (LMI) African-Americans. In contrast, subprime loans were 19.2 percent of refinance loans to LMI whites in 2004. LMI African-Americans were 2.2 times more likely than LMI whites to receive high-cost loans. Even for middle- and upper-income (MUI) African-Americans, high-cost loans made up a large percentage (30.2 percent) of all refinance loans. Moreover, the subprime share of loans to MUI African-Americans was 2.7 times larger than the subprime share of loans to MUI whites. The same phenomena of increasing disparities when income increased was observed when comparing high-cost lending in predominantly white and immigrant neighborhoods.

NCRC's findings are consistent with a wide variety of research on subprime lending. A survey study conducted by Freddie Mac analysts finds that two-thirds of subprime borrowers were not satisfied with their loans, while three-quarters of prime borrowers believed they received fair rates and terms. In previous years, Freddie Mac and Fannie Mae had often been quoted as stating that between a third to a half of borrowers who qualify for low cost loans receive subprime loans. The Federal Reserve also released analyses of the 2004 and 2005 HMDA data revealing racial disparities even after controlling for income levels, loan

⁷ Freddie Mac analysts Marsha J. Courchane, Brian J. Surette, Peter M. Zorn, *Subprime Borrowers: Mortgage Transitions and Outcomes*, September 2002, prepared for Credit Research Center, Subprime Lending Symposium in McLean, VA.

⁸ "Fannie Mae Vows More Minority Lending," in the Washington Post, March 16, 2000, page E01. Freddie Mac web page, http://www.freddiemac.com/corporate/reports/moseley/chap5.htm.

types, and geographical areas. Dan Immergluck was one of the first researchers to document the "hypersegmentation" of lending by race of neighborhood. The Department of Housing and Urban Development also found that after controlling for housing stock characteristics and the income level of the census tract, subprime lending increases as the minority level of the tract increases. Even the Research Institute for Housing America, an offshoot of the Mortgage Bankers Association, found that minorities were more likely to receive loans from subprime institutions, after controlling for the creditworthiness of the borrowers. 12

Paul Calem of the Federal Reserve, and Kevin Gillen and Susan Wachter of the Wharton School also use credit scoring data to conduct econometric analysis scrutinizing the influence of credit scores, demographic characteristics, and economic conditions on the level of subprime lending. Their study found that after controlling for creditworthiness and housing market conditions, the level of subprime refinance and home purchase loans increased in a statistically significant fashion as the portion of African-Americans increased on a census tract level in Philadelphia and Chicago. The Center for Responsible Lending also recently used the 2004 HMDA data with pricing information to reach the same troubling conclusions that racial disparities remain after controlling for creditworthiness. 14

Research Findings

For this report, NCRC conducted an analysis of Home Mortgage Disclosure Act (HMDA) data for metropolitan areas across the country using the 2005 data,

⁹ Avery, Robert B., Glenn B. Canner, and Robert E. Cook, "New Information Reported under HMDA and Its Application in Fair Lending Enforcement." *Federal Reserve Bulletin*, Summer 2005. Avery, Robert B., Kenneth P. Brevoot, and Glenn B. Canner, "Higher-Priced Home Lending and the 2005 HMDA Data," *Federal Reserve Bulletin*, September 2006.

¹⁰ Dan Immergluck, *Two Steps Back: The Dual Mortgage Market, Predatory Lending, and the Undoing of Community Development*, the Woodstock Institute, November 1999.

¹¹ Randall M. Scheessele, *Black and White Disparities in Subprime Mortgage Refinance Lending*, April 2002, published by the Office of Policy Development and Research, the U.S. Department of Housing and Urban Development.

¹² Anthony Pennington-Cross, Anthony Yezer, and Joseph Nichols, *Credit Risk and Mortgage Lending: Who Uses Subprime and Why*? Working Paper No. 00-03, published by the Research Institute for Housing America, September 2000.

¹³ Paul S. Calem, Kevin Gillen, and Susan Wachter, *The Neighborhood Distribution of Subprime Mortgage Lending*, October 30, 2002. Available via pcalem@frb.gov. also Paul S. Calem, Jonathan E. Hershaff, and Susan M. Wachter, *Neighborhood Patterns of Subprime Lending: Evidence from Disparate Cities*, in Fannie Mae Foundation's Housing Policy Debate, Volume 15, Issue 3, 2004 pp. 603-622

¹⁴ Center for Responsible Lending, *Unfair Lending: The Effect of Race and Ethnicity on the Price of Subprime Mortgages*, see

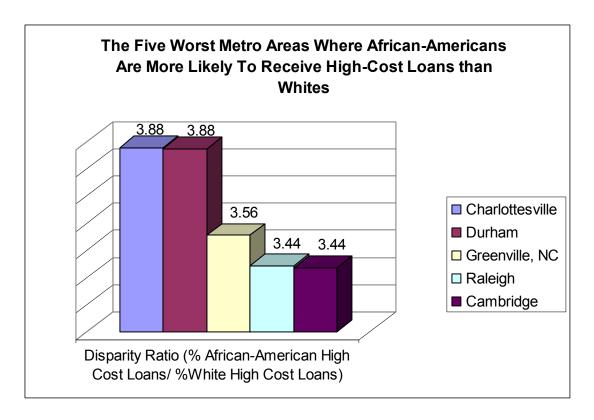
http://www.responsiblelending.org/issues/mortgage/reports/page.jsp?itemID=29371010

which is the most recent publicly available data on an industry-wide basis. NCRC considered loans for traditional single family homes occupied by the borrowers of the loans (investor owned properties were not considered). The home loan data considered was home purchase, refinance, and home improvement lending (first liens only). HMDA data reports pricing information for high-cost loans. NCRC considered loans without pricing information to be market-rate loans and loans with pricing information to be high-cost loans.

NCRC focused the analysis on racial disparities in lending experienced by lowand moderate-income borrowers considered separately from middle- and upperincome borrowers. Income level is an important factor in the lending process. While persistent racial disparities across all income levels do not prove discrimination, it would appear that stakeholders could take action to narrow particularly large disparities for middle- and upper-income minorities and whites. Large disparities at all income levels suggest a lack of competition among lenders and other market barriers that can be reduced by concerted action. Stakeholders and policymakers must consider carefully any differences by race that persists for middle- and upper-income borrowers.

Largest and Smallest Disparities Experienced by African-Americans

Comparing the lending disparities between African-American borrowers and white borrowers, the Charlottesville, VA Metropolitan Statistical Area (MSA) was the worst and the El Paso, TX MSA ranked the best for home lending during 2005. The worst MSAs were predominantly located in the south and mid-west of the United States; the mid-Atlantic and New England also had some MSAs experiencing wide disparities (see Table 1 – tables are after the recommendations).



Of all home loans to African-Americans in the Charlottesville, VA MSA, 43.0% were high-cost, while only 11.1% of loans received by whites were high-cost. African-Americans received high-cost loans 3.88 times more frequently than white borrowers (43.0% of all loans for African-Americans that were high-cost divided by 11.1% of the loans for whites that were high-cost). Rounding out the worst five metropolitan areas were Durham, NC; Greenville, NC; Raleigh, NC; and Cambridge, MA. In each of these metropolitan areas, African-Americans were more than 3.4 times as likely as whites to receive high-cost loans.

In contrast, in the El Paso, TX MSA 27.0% of loans issued to African-Americans was high-cost while 31.9% of loans received by whites were high-cost. African-Americans were .85 times as likely to receive high-cost loans as whites. In other words, African-Americans were less likely to receive high-cost loans than whites (whenever the disparity ratio is less than one, the minority group is less likely to

¹⁵ Some metropolitan areas in which disparities are low for any particular group (such as African-Americans) also have small populations of the minority group. This study did not attempt to control for the size of the minority population across metropolitan areas. Instead, it provides a picture of disparities across all metropolitan areas so that stakeholders can decide for themselves the meaning of disparities in their communities. The study does not analyze lending patterns to a minority group when the number of loans is below 50 because fewer than 50 observations are not meaningful in a statistical sense for a metropolitan area.

receive high cost loans). MSAs in the Southwest and West Coast generally had the least disparities in high cost lending between African-American and whites.

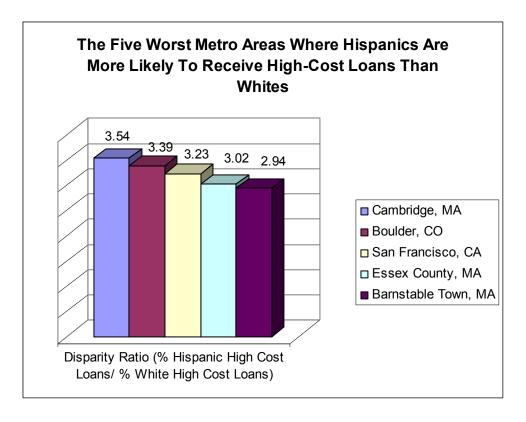
The Charlottesville, VA MSA also ranked the worst in home lending to low-to moderate-income (LMI) African-American borrowers. Of all loans to LMI African-American borrowers, 48.0% were high-cost, while only 15.2% of the loans received by LMI whites were high-cost. This means that LMI African-American borrowers were 3.16 times more likely to receive a high-cost loan than LMI white borrowers. (see Table 2) Those MSAs that were ranked the worst were predominantly located in the south, mid-Atlantic, and mid-west regions of the country.

The Pine Bluff, AR MSA was ranked the best in lending patterns for home loans to LMI African-American borrowers. In the Pine Bluff, AR MSA, 42.3% of all loans to LMI African-Americans were high-cost while 40.3% of all loans issued to LMI whites were high-cost. This means that African-Americans were 1.05 times more likely to receive a high-cost loan than LMI whites.

Similar results were found in terms of the MSAs with the widest disparities when looking at lending patterns for middle- to upper-income (MUI) African-American borrowers. Those MSAs ranked as the worst were located largely in the South, Midwest, and New England regions of the country (see Table 3). The Durham, NC MSA ranked the worst; 38.6% of loans to MUI African-Americans was high-cost, while only 8.6% of loans to MUI whites were high-cost. MUI African-American borrowers in the Durham, NC MSA were 4.50 times more likely to receive a high-cost loan then MUI white borrowers. Rounding out the worst five MSAs were Raleigh, NC; Charlottesville, VA; Cambridge, MA; and Greenville, NC.

Largest and Smallest Disparities Experienced by Hispanics

Metropolitan areas in Massachusetts constituted three of the five worst areas in terms of disparities in high-cost lending to Hispanics and whites. Surprisingly, New England metropolitan areas tended to cluster among the worst areas, followed by mid-west and West Coast MSAs. The worst disparity occurred in Cambridge, MA during 2005. In Cambridge, MA, 42.8% of all home loans issued to Hispanics were high-cost while 12.1% of all loans received by whites were high-cost. Hispanic borrowers received high-cost loans 3.54 times more frequently than white borrowers (see Table 4).



Some Southern MSAs exhibited the least disparities between Hispanics and whites. For example, in the Dalton, GA MSA, 15.8% of all home loans issued to Hispanic borrowers were high-cost while 28.1% of all loans received by whites were high-cost. Hispanic borrowers were only 0.56 times as likely to receive a high-cost loan then white borrowers.

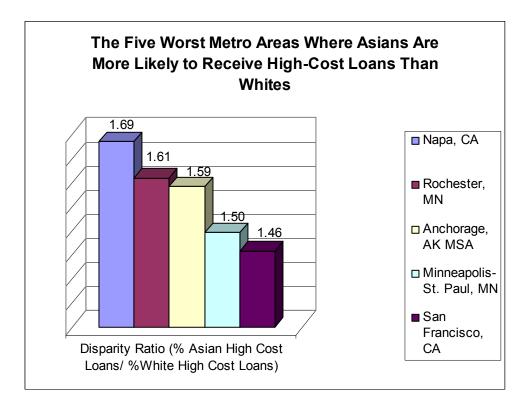
Interestingly, a number of Puerto Rican MSAs had few disparities in high-cost lending between Hispanics and whites. In some of these MSAs, the percentage of high-cost loans for both borrower groups was small. Texas and California MSAs also exhibited narrow disparities in high-cost lending between Hispanics and whites, but in some of these MSAs like Laredo, TX and El Centro, CA, the percentage of high-cost lending was relatively high for both groups of borrowers.

Tables 5 and 6 show specific lending patterns for LMI Hispanics and MUI Hispanics. One noteworthy observation was that New England MSAs and metropolitan areas in Massachusetts continued to exhibit high disparities.

Largest and Smallest Disparities Experienced by Asians

Western MSAs tend to exhibit the worst disparities in high-cost lending between Asians and whites. The Napa, CA MSA ranked worst for high-cost lending patterns for Asian borrowers. In the Napa, CA MSA, 20.6% of all home loans

issued to Asian borrowers were high-cost while 12.2% of all loans received by white borrowers were high-cost in 2005. Asian borrowers were 1.69 times more likely to receive a high-cost loan then white borrowers. Rounding out the worst five in terms of disparities was Rochester, MN; Anchorage, AK; Minneapolis, MN; and San Francisco, CA (see Table 7)



Refer to Tables 8 and 9 for more specific data on lending patters to LMI Asians and MUI Asians.

Largest and Smallest Disparities by Income Level of Borrower

Table 10 displays disparities in high-cost lending by income level. No particular region contains a concentration of MSAs with the worst disparities by income level. The five worst metropolitan areas in descending order are San Juan, PR; Morgantown, WV; Philadelphia, PA; Bismark, ND; and Gainsville, FL. The five areas with the least disparities are Barnstable Town, MA; New York-White Plains, NY; Santa Cruz, CA; San Francisco, CA; and Santa Rosa; CA.

Best and Worst Metropolitan Areas

Table 11 displays the metropolitan areas with the largest and smallest disparities across the racial categories. For this table, NCRC displayed an MSA if the MSA

had enough observations for calculating disparities for two races or ethnic groups compared to whites and the disparity for LMI compared to MUI borrowers. ¹⁶ The MSAs with the largest disparities overall in descending order were Charleston, SC; Bridgeport, CT; Omaha, NE; Milwaukee, WI; and Springfield, MA during 2005.

Racial Disparities Increase as Income Level Increases

Racial disparities in high-cost lending increase when income levels increase. When the percentage of high-cost loans received by whites is compared against the percentage of high-cost loans received by minorities, the disparities in the percentages is larger for MUI whites and MUI minorities than for LMI whites and LMI minorities.

The percentage of high-cost loans received by MUI borrowers is lower than for LMI borrowers, but the percentage of high-cost loans received by MUI whites drops significantly more than the percentage of high-cost loans received by MUI minorities. For example, in Durham, NC, 48% of the loans received by LMI African-Americans were high-cost while 16.4% of the loans received by LMI whites were high-cost. When considering MUI borrowers, 38.6% of the loans received by MUI African-Americans were high-cost while 8.6% of the loans received by MUI whites were high-cost in Durham, NC during 2005. The percentage of high-cost loans received by whites dropped by about half when climbing the income scale from LMI to MUI (16.4% compared to 8.6%). In contrast, the percentage of loans received by African-Americans dropped by only one-fifth for MUI African-Americans compared to LMI African-Americans (38.6% compared to 48%).

MUI minorities experienced high absolute percentages of high-cost loans in addition to large disparities relative to whites. In 159 metropolitan areas, more than 40% of the loans received by MUI African-American were high-cost loans. For MUI Hispanics, more than 40% of the loans received were high-cost in 71 MSAs and more than 30% of the loans received were high-cost in 137 MSAs.

For African-Americans, differences in high-cost lending increases significantly as income increases. LMI African-Americans were 3 times or more likely than LMI whites to receive high-cost loans in just 1% of the MSAs. In contrast, MUI African-Americans were 3 times or more likely to receive high-cost loans than MUI whites in 12.4% MSAs during 2005 (see Table 12). The same trend of MUI African-Americans experiencing greater disparities continues when considering

¹⁶ Table 11 displays 10 indicators of lending disparities. An MSA would need to have enough observations (at least 50 high-cost loans for a borrower group) for 7 of the indicators to be included in the table.

the number of MSAs in which African-Americans were between 2.5 to 3 times more likely to receive loans. LMI African-Americans were 2.5 to 3.0 times more likely than LMI whites to receive high-cost loans in 5.1% of the MSAs. In contrast, MUI African-Americans were 2.5 to 3.0 times more likely than MUI whites to receive high-cost loans in 28.0% of the MSAs.

Shockingly, MUI African-Americans were twice as likely or more than MUI whites to receive high-cost loans in 167 MSAs. LMI African-Americans were twice as likely or more than twice as likely to receive high-cost loans in 70 MSAs.

Just as for African-Americans, the disparity in high-cost lending for Hispanics becomes greater for MUI Hispanics then LMI Hispanics. LMI Hispanics were between 2.5 to 3 times more likely than LMI whites to receive high-cost loans in 1.2% of the MSAs. In contrast, MUI Hispanics were between 2.5 to 3 times more likely than MUI whites to receive high-cost loans in 11.8% of the MSAs. Similarly, LMI Hispanics were 2.0 to 2.5 times more likely to receive high-cost loans than LMI whites in 4.8% of the MSAs while MUI Hispanics were 2.0 to 2.5 times more likely to receive high-cost loans than MUI whites in 27.0% of the MSAs.

Distressingly, MUI Hispanics were twice or more likely than MUI whites to receive high-cost loans in 75 MSAs. LMI Hispanics were twice or more likely to receive high-cost loans than LMI whites in 10 MSAs.¹⁷

Asians generally experienced fewer disparities in high-cost lending than African-Americans and Hispanics, but even for Asians, disparities increased as income level increased. For example, LMI Asians were between 1 to 1.5 times more likely than LMI whites to receive high-cost loans in 8.5% of the MSAs. In contrast, MUI Asians received high-cost loans 1.0 to 1.5 times greater then MUI whites in 20.9% of the MSAs.

A common expectation is that disparities in lending by race would narrow as income increases. More affluent borrowers should have fewer difficulties paying their bills on time, meaning that more affluent borrowers should have fewer difficulties maintaining good credit histories. Therefore, it would seem that MUI minorities should have similar creditworthiness to MUI whites. As a consequence, MUI minorities should have expanded access to market-rate loans and receive fewer high-cost loans. On the other hand, some would say that

¹⁷ The differences in the number of MSAs in various categories of disparities for African-Americans and Hispanics are due in part to differences in the number of MSAs in the analysis. NCRC did not analyze lending patterns in a MSA if the number of market-rate or high-cost loans for a racial and/or income group was less than 50 loans. Fewer than 50 loans in an MSA reduces the statistically reliability of the data. For the same reason, the study observes lending patterns in fewer MSAs for Asians.

differences in creditworthiness by race could persist even when income increases. Thus, differences in high-cost lending could be the same for MUI minorities compared to MUI whites as it is for LMI minorities compared to LMI whites.

While this study was not able to attain creditworthiness by race and income, it is startling nonetheless that differences in high-cost lending increases as income levels increase. This finding would suggest that creditworthiness of minorities declines compared to whites as income level increases. Another explanation for this finding, which NCRC finds more plausible, is that discrimination and/or other market imperfections is impeding access to market-rate loans for middle- and upper-income minorities. Lenders could be overtly steering minorities qualified for prime loans into high-cost loans. Alternatively, lenders specializing in high-cost loans could be working harder to make loans to MUI minorities than market-rate lenders. Both possibilities (discrimination and less effort by market-rate lenders) could be occurring at the same time. The fact that MUI minorities receive such large percentages of high-cost loans suggests that multiple barriers to equal access are occurring simultaneously. These startling and persistent disparities suggest that the burden lies on skeptics to disprove the existence of discrimination and other barriers to equal access to market-rate loans.

Conclusion

Responsible subprime lending has an important role to play in the marketplace, however, this study demonstrates that high-cost lending is disproportionately targeted to minorities, even middle- and upper-income minorities. Standard antitrust theory suggests that when relatively few companies serve any group of consumers, that group of consumers is more likely to suffer abuses. In light of the findings that minorities, regardless of income levels, receive a disproportionate amount of high-cost lending, NCRC offers a number of programmatic and policy recommendations in order to stop predatory lending in minority communities. The level of foreclosure prevention counseling needs to be significantly increased to prevent consumers from falling victim to predatory lending. In addition, policy reforms and increased regulatory enforcement must eradicate widespread abuses in the high-cost lending sphere. Action is urgently needed to head-off a foreclosure crisis.

Recommendations

NCRC offers the following recommendations:

Programmatic Partnerships

Banks, community organizations, and public agencies should work together to establish programs for refinancing ARM high-cost loans into lower-cost fixed-rate loans. Counseling organizations can identify borrowers who were steered into high-cost loans when they qualified for lower cost loans. In addition, counseling organizations and lending institutions must identify borrowers who are having difficulties paying ARM high-cost loans with rates that are adjusting upward. Public agencies and the Federal Home Loan Banks can provide grants and low interest rate loans, when necessary, to assist borrowers with temporary cash shortfalls. In April of 2007, the federal banking agencies issued a statement encouraging banks to engage in these activities. The statement reiterated that banks can earn points on their Community Reinvestment Act (CRA) exams when engaging in loan modifications and refinancing borrowers into lower cost loans. ¹⁸

National Foreclosure Prevention

NCRC urges policy-makers to adopt a foreclosure prevention bill that provides funding for foreclosure prevention counseling. In the spring of 2007, Senators Schumer (NY) and Reed (RI) have introduced foreclosure prevention bills worthy of swift congressional passage.

Senator Schumer has proposed that Congress appropriate \$300 million to provide funding through the Department of Housing and Urban Development (HUD) to nonprofit counseling agencies to engage in foreclosure prevention counseling. Senators Schumer, Brown of Ohio, and Casey of Pennsylvania have also asked major financial industry trade associations to generate a \$2 private sector match for every \$1 appropriated by the federal government to fund foreclosure prevention efforts like NCRC's CRF program. Based on a report issued in the spring of 2007 by the Joint Economic Committee of the U.S. Congress, the Senators estimate that their public and private sector funding would assist between 300,000 to 900,000 families in danger of foreclosure. A foreclosure can impose societal costs of \$80,000 in contrast to foreclosure prevention counseling, which costs about \$1,000 per assisted borrower. Considering that about 2 million families confront ARM mortgages with interest rates that will increase this year and next, the Senators' approach is cost-effective and promises

April 11, 2007, http://jec.senate.gov/Documents/Reports/subprime11apr2007revised.pdf.

See http://www.federalreserve.gov/BoardDocs/Press/bcreg/2007/20070417/default.htm
 Joint Economic Committee, Sheltering Neighborhoods from the Subprime Foreclosure Storm,

to prevent financial and emotional stress inflicted upon families losing their homes

Senator Reed has introduced a similar bill, S. 1386 - the Homeownership Protection and Enforcement (HOPE) Act, that would provide \$610 million for non-profit counseling agencies and state agencies to provide forbearance and loan modification services to distressed borrowers. Servicers (entities that handle loan payments on behalf of the companies owning the loans) are required to make reasonable loan mitigation efforts before foreclosing on loans.

Comprehensive Anti-Predatory Lending Legislation

Since our analysis revealed a disproportionate amount of high-cost lending targeted to vulnerable borrowers and communities, Congress must respond by enacting comprehensive anti-predatory lending legislation along the lines of bills introduced by Representatives Watt, Miller, and Frank and Senator Schumer. Comprehensive and strong anti-predatory lending legislation would eliminate the profitability of exploitative practices by making them illegal. It could also reduce the amount of price discrimination since fee packing and other abusive practices would be prohibited. A comprehensive anti-predatory law would also strengthen the Community Reinvestment Act (CRA) if regulatory agencies severely penalize lenders through failing CRA ratings when the lenders violate anti-predatory law.

Senator Schumer has recently introduced S. 1299, or the Borrower's Protection Act of 2007, that would require lenders to assess a borrower's ability to pay a loan at the maximum possible rate during the first seven years of the loan. This procedure eliminates the dangerous practice of qualifying a borrower based on a low "teaser" rate in place during the first two or three years of the loan. The bill would also prohibit steering or price discrimination by making it illegal for lenders to refer borrowers to loans that are not reasonably advantageous for them, based on the loan terms for which borrowers qualify.

Fair Lending Enforcement Must be Increased

In September of 2005, the Federal Reserve Board stated that it referred about 200 lending institutions to their primary federal regulatory agency for further investigations based upon the Federal Reserve's identification of significant pricing disparities in HMDA data. An industry publication subsequently quoted a Federal Reserve official as stating that these lenders accounted for almost 50

²⁰ Robert B. Avery, Glenn B. Canner, and Robert E. Cook, *New Information Reported under HMDA and Its Application in Fair Lending Enforcement*, Federal Reserve Bulletin, Summer 2005, http://www.federalreserve.gov/pubs/bulletin/2005/05summerbulletin.htm

percent of the HMDA-reportable loans issued in 2004.²¹ In September of 2006, the Federal Reserve Board referred a larger number of lenders, 270, to their primary regulatory agency for further investigations.²²

After the initial excitement, the public has not heard about the outcomes of the Federal Reserve referrals. Not a single case of discrimination or civil rights violations have arisen from the Federal Reserve's referrals. Given the large share of lending represented by the financial institutions under investigation, the general public should receive an update of the status of these fair lending investigations from all the regulatory agencies. In addition, the federal agencies should annually report to Congress how many fair lending investigations they conducted, the types of fair lending investigations, and the outcomes of these investigations. Since the pricing disparities remain stubborn and persistent in 2005, fair lending investigations and enforcement must be intensified, yet the general public has received little word regarding the actions of the federal regulatory agencies.

Enhance the Quality of HMDA Data

NCRC believes that Congress and the Federal Reserve Board (which implements the HMDA regulations) must enhance HMDA data so that regular and comprehensive studies can scrutinize fairness in lending. Specifically, are minorities, the elderly, women, and low- and moderate-income borrowers and communities able to receive loans that are fairly priced? More information in HMDA data is critical to fully explore the intersection of price, race, gender, and income.

The first area in which HMDA data must be enhanced is pricing information for all loans, not just high-cost loans. The interest rate movements in 2005 demonstrate the confusion associated with classifying the loans that currently have price information reported. Economists as well as the general public do not know whether to call the loans with price reporting, "subprime," "high-cost," or some other name. If price was reported for all loans, the classification problems would be lessened. All stakeholders could review the number and percentages of loans in all the price spread categories. The most significant areas of pricing disparities could be identified with more precision.

HMDA data must contain credit score information similar to the data used in NCRC's *Broken Credit System* report released in the winter of 2003. For each HMDA reportable loan, a financial institution must indicate whether it used a credit score system and if the system was their own or one of the widely used

²¹ Inside Regulatory Strategies, November 14, 2005, p.2.

²² Joe Adler, *Big Increase in Lenders with Suspect HMDA Data*, American Banker, September 11, 2006.

systems such as FICO (a new data field in HMDA could contain 3 to 5 categories with the names of widely-used systems). The HMDA data also would contain one more field indicating which quintile of risk the credit score system placed the borrower.

Another option is to attach credit score information in the form of quintiles to each census tract in the nation. That way, enhanced analyses can be done on a census tract level to see if pricing disparities still remain after controlling for creditworthiness. This was the approach adopted in NCRC's *Broken Credit System* and in studies conducted by Federal Reserve economists. Finally, HMDA data must contain information on other key underwriting variables including the loan-to-value and debt-to-income ratios. Finally, Senator Reed's bill, S. 1386, would create a database on foreclosures and delinquencies that would be linked with HMDA. This would be an important data enhancement that would help policymakers understand which loan terms and conditions (such as loan-to-value ratios and fixed or ARM) are more likely to be associated with delinquencies and foreclosures

Federal Reserve Board Must Step Up Anti-Discrimination and Fair Lending Oversight

The Government Accountability Office concluded that the Federal Reserve Board has the authority to conduct fair lending reviews of affiliates of bank holding companies. The Federal Reserve Board at first insisted that it lacked this authority, but has recently made some moves to examine affiliates.²³ The Federal Reserve should clarify how and to what extent it is examining affiliates because comprehensive anti-discrimination exams of all parts of bank holding companies are critical. Most of the major banks have acquired large subprime lenders that are then considered affiliates. A pressing question is the extent to which the subprime affiliates refer creditworthy customers to the prime parts of the bank so that the customers receive loans at prevailing rates instead of higher subprime rates. Or does the subprime affiliate steer creditworthy borrowers to high-cost loans? These questions remain largely unanswered. Consequently, we do not know the extent of steering by subprime affiliates and/or their parent banks.

Strengthen CRA by Applying It to Minority Neighborhoods and All Geographical Areas Lenders Serve

In order to increase prime lending for minority borrowers and reduce lending disparities, CRA exams must evaluate the banks' records of lending to minority borrowers and neighborhoods as well as scrutinizing banks' performance in

²³ Government Accountability Office, *Large Bank Mergers: Fair Lending Review Could be Enhanced with Better Coordination*, November 1999, GAO/GGD-00-16.

reaching low- and moderate-income borrowers and neighborhoods. If CRA exams covered minority neighborhoods, pricing disparities in these neighborhoods would be reduced. The Federal Reserve Board, in its review of 2004 HMDA data, found that bank lending exhibited fewer disparities in geographical areas covered by their CRA exams than in areas not covered by their exams. CRA's mandate of affirmatively meeting credit needs is currently incomplete as it is now applied only to low- and moderate-income neighborhoods, not minority communities.

CRA must also be strengthened so that depository institutions undergo CRA examinations in all geographical areas in which they make a significant number of loans. Currently, CRA exams assess lending primarily in geographical areas in which banks have their branches. But the overlap between branching and lending is eroding with each passing year as lending via brokers and correspondents continues to increase. NCRC strongly endorses HR 1289 or the CRA Modernization Act of 2007. HR 1289 mandates that banks undergo CRA exams in geographical areas in which their market share of loans exceeds one half of one percent in addition to areas in which their branches are located.

Short of statutory changes to CRA, NCRC believes that the regulatory agencies have the authority to extend CRA examinations and scrutiny to geographical areas beyond narrow "assessment" areas in which branches are located. Currently, the federal banking agencies will consider lending activity beyond assessment areas if the activity will enhance CRA performance. Likewise, the CRA rating must be downgraded if the lending performance in reaching low- and moderate-income borrowers is worse outside than inside the assessment areas.

CRA Must be Expanded to Non-Bank Lending Institutions

Large credit unions and independent mortgage companies do not abide by CRA requirements. NCRC and Government Accountability Office (GAO) research concludes that large credit unions lag CRA-covered banks in their lending and service to minorities and low- and moderate-income borrowers and communities. Unlike their counterparts, credit unions in Massachusetts are covered by a state CRA law. NCRC has also found that CRA-covered credit unions in Massachusetts issue a higher percentage of their loans to LMI and minority borrowers and communities than credit unions not covered by CRA. Therefore, NCRC believes that applying CRA to both large credit unions and independent mortgage companies will increase their market-rate lending to LMI and minority borrowers.

²⁴ Avery and Canner, op. cit.

²⁵ NCRC, Credit Unions: True to their Mission?, 2005, http://www.ncrc.org; and Government Accountability Office, Credit Unions: Greater Transparency Needed on Who Credit Unions Serve and on Senior Executive Compensation Arrangements, November, 2006

CRA Exams Must Scrutinize Subprime Lending More Rigorously

Currently, CRA exams are not adequately assessing the CRA performance of subprime lenders. For example, the CRA exam of the subprime lender, Superior Bank, FSB, called its lending innovative and flexible before that thrift's spectacular collapse. Previous NCRC comment letters to the regulators have documented cursory fair lending reviews for the great majority of banks and thrifts involved in subprime lending. If CRA exams continue to mechanistically consider subprime lending, subprime lenders will earn good ratings since they usually offer a larger portion of their loans to low- and moderate-income borrowers and communities than prime lenders.

At this point, the federal regulatory agencies have amended the CRA regulation to penalize banks if their lending violates federal anti-predatory law. NCRC has not seen rigorous action to implement this aspect of the CRA regulation. Fair lending reviews that accompany CRA exams do not usually scrutinize subprime lending for compliance with anti-predatory law, for possible pricing discrimination, or whether abusive loans are exceeding borrower ability to repay. NCRC recommends that all CRA exams of subprime lenders must be accompanied by a comprehensive fair lending and anti-predatory lending audit. In addition, CRA exams must ensure that prime lenders are not financing predatory lending through their secondary market activity or servicing abusive loans.

GSEs Must Abide by Anti-Predatory Safeguards

The Government-Sponsored Enterprises (GSEs), including Fannie Mae, Freddie Mac, and the Federal Home Loan Banks, purchase more than half of the home loans made on an annual basis in this country. It is vitally important, therefore, that the GSEs have adopted adequate protections against purchasing predatory loans. Fannie Mae and Freddie Mac have voluntarily adopted significant protections such as purchasing no loans with fees exceeding five percent of the loan amount, no loans involving price discrimination or steering, no loans with prepayment penalties beyond three years, and no loans with mandatory arbitration. The Department of Housing and Urban Development (HUD) has ruled that Fannie Mae and Freddie Mac will not receive credit towards their Affordable Housing Goals for any loans that contain certain abusive features.

²⁶ Office of Thrift Supervision Central Region's CRA Evaluation of Superior Bank, FSB, Docket #: 08566, September 1999. Available via http://www.ots.treas.gov, go to the CRA search engine and select "inactive" for the status of the institution being searched.

²⁷ NCRC comment letter to federal banking agencies on joint CRA proposal, April 2, 2004. Available via: http://www.ncrc.org.

HUD's ruling is an important first step, but it needs to be enhanced. HUD's ruling, for example, does not include disqualification from goals consideration of loans with mandatory arbitration. The Federal Housing Finance Board, as the regulator for the Federal Home Loan Banks, has not formally applied protections against abusive loans to the Home Loan Banks. Congress has an opportunity to further bolster the anti-predatory protections applied to GSE loan purchasing activity as Congress considers GSE regulatory reform.

Report Tables

Table 1 - NCRC Analysis: African-American/White

State	MSA	# High-Cost Loans to African- Americans	% High-Cost Loans to African- Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
51 VA	16820 Charlottesville, VA MSA	248	43.0%	638	11.1%	3.88	251
37 NC	20500 Durham, NC MSA	1,126	40.4%	984	10.4%	3.88	250
37 NC	24780 Greenville, NC MSA	330	44.5%	398	12.5%	3.56	249
37 NC	39580 Raleigh-Cary, NC MSA	2,176	42.1%	3,603	12.2%	3.44	248
25 MA	15764 Cambridge-Newton-Framingham, MA MD	581	41.5%	5,036	12.1%	3.44	247
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	3,868	60.7%	8,093	17.8%	3.42	246
37 NC	48900 Wilmington, NC MSA	354	47.6%	1,691	14.3%	3.33	245
45 SC	16700 Charleston-North Charleston, SC MSA	1,589	51.9%	3,125	16.1%	3.22	244
19 IA	47940 Waterloo-Cedar Falls, IA MSA	98	58.3%	853	18.3%	3.19	243
12 FL	23540 Gainesville, FL MSA	398	52.4%	946	16.5%	3.18	242
42 PA	37964 Philadelphia, PA MD	5,856	43.0%	12,860	13.7%	3.13	241
26 MI	11460 Ann Arbor, MI MSA	499	44.1%	1,294	14.1%	3.13	240
17 IL	28100 Kankakee-Bradley, IL MSA	183	66.8%	598	21.5%	3.11	239
55 WI	31540 Madison, WI MSA	104	38.7%	2,420	12.5%	3.08	238
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	3,091	56.8%	21,974	18.5%	3.07	237
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	1,152	44.1%	3,949	14.5%	3.04	236
25 MA	14484 Boston-Quincy, MA MD	2,621	42.2%	7,625	14.1%	3.00	235
51 VA	40060 Richmond, VA MSA	5,238	47.2%	5,533	15.9%	2.97	234
IL+MO	41180 St. Louis, MO-IL MSA	8,264	59.7%	18,592	20.2%	2.96	233
51 VA	31340 Lynchburg, VA MSA	343	49.9%	964	17.0%	2.93	232
13 GA	42340 Savannah, GA MSA	901	45.3%	1,216	15.5%	2.92	231
34 NJ	45940 Trenton-Ewing, NJ MSA	736	44.6%	1,308	15.4%	2.89	230
25 MA	21604 Essex County, MA MD	392	47.2%	4,273	16.4%	2.88	229
17 IL	14060 Bloomington-Normal, IL MSA	77	36.2%	582	12.7%	2.85	228
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	8,024	62.7%	5,017	22.3%	2.82	227
25 MA	49340 Worcester, MA MSA	521	51.8%	5,126	18.5%	2.80	226
37 NC	40580 Rocky Mount, NC MSA	494	52.0%	320	18.6%	2.80	225
48 TX	46340 Tyler, TX MSA	249	54.0%	746	19.3%	2.80	224
17 IL	44100 Springfield, IL MSA	97	42.2%	864	15.1%	2.79	223
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	7,770	43.5%	7,697	15.6%	2.79	222
12 FL	45220 Tallahassee, FL MSA	844	45.9%	1,335	16.5%	2.77	221
42 PA	25420 Harrisburg-Carlisle, PA MSA	344	43.1%	2,285	15.8%	2.73	220
01 AL	33860 Montgomery, AL MSA	1,123	43.9%	1,117	16.1%	2.73	219
36 NY	15380 Buffalo-Niagara Falls, NY MSA	395	44.7%	2,973	16.4%	2.72	218
01 AL	46220 Tuscaloosa, AL MSA	493	45.1%	659	16.7%	2.70	217
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	546	55.6%	4858	20.6%	2.70	216
37 NC	11700 Asheville, NC MSA	153	50.0%	2,136	18.6%	2.69	215
45 SC	24860 Greenville, SC MSA	789	51.2%	2,562	19.2%	2.67	214
01 AL	12220 Auburn-Opelika, AL MSA	192	43.7%	497	16.6%	2.64	213
28 MS	27140 Jackson, MS MSA	2,348	55.0%	1,786	20.9%	2.64	212
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	4,107	47.1%	9,524	17.9%	2.63	211
42 PA	21500 Erie, PA MSA	95	51.4%	1,102	19.6%	2.62	210
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	3,308	49.5%	4,191	18.9%	2.62	209
29 MO	17860 Columbia, MO MSA	63	37.1%	563	14.2%	2.61	208
KS+MO	28140 Kansas City, MO-KS MSA	3,543	57.4%	15,136	22.0%	2.61	207
13 GA	15260 Brunswick, GA MSA	200	61.7%	567	23.8%	2.60	206

Table 1 - NCRC Analysis: African-American/White

State	MSA	# High-Cost Loans to African- Americans	% High-Cost Loans to African- Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
01 AL	26620 Huntsville, AL MSA	921	43.6%	1,638	16.9%	2.58	205
25 MA	44140 Springfield, MA MSA	540	51.2%	3,695	19.9%	2.58	204
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	250	18.2%	2,558	7.1%	2.57	203
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	4,152	41.2%	7,413	16.2%	2.54	202
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	24,976	43.9%	21,755	17.3%	2.54	201
25 MA	12700 Barnstable Town, MA MSA	59	39.6%	1,487	15.6%	2.54	200
37 NC	49180 Winston-Salem, NC MSA	746	39.6%	1,708	15.6%	2.54	199
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	1,347	43.0%	5,705	17.0%	2.53	198
55 WI	39540 Racine, WI MSA	200	48.0%	1,419	18.9%	2.53	197
12 FL	46940 Vero Beach, FL MSA	127	54.7%	1,110	21.6%	2.53	196
42 PA	49620 York-Hanover, PA MSA	233	45.9%	2,621	18.2%	2.52	195
18 IN	23060 Fort Wayne, IN MSA	362	52.6%	2,415	20.9%	2.52	194
36 NY	40380 Rochester, NY MSA	461	42.2%	3,185	16.8%	2.52	193
18 IN	23844 Gary, IN MD	1,383	58.5%	4,340	23.2%	2.52	192
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	3,280	47.3%	17,230	18.8%	2.51	191
45 SC	17900 Columbia, SC MSA	2,123	48.1%	2,681	19.1%	2.51	190
NJ+PA	35084 Newark-Union, NJ-PA MD	4.897	46.0%	9.618	18.4%	2.51	189
01 AL	13820 Birmingham-Hoover, AL MSA	4,070	56.2%	6,041	22.4%	2.51	188
17 IL	16974 Chicago-Naperville-Joliet, IL MD	25,712	56.5%	58,143	22.6%	2.49	187
37 NC	24140 Goldsboro, NC MSA	202	39.1%	291	15.7%	2.49	186
39 OH	19380 Dayton, OH MSA	1,147	50.0%	4,239	20.1%	2.49	185
12 FL	34940 Naples-Marco Island, FL MSA	248	52.9%	2,929	21.3%	2.49	184
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	240	59.1%	2,018	23.8%	2.49	183
39 OH	41780 Sandusky, OH MSA	56	48.3%	357	19.4%	2.48	182
48 TX	17780 College Station-Bryan, TX MSA	110	56.1%	651	22.6%	2.48	181
13 GA	40660 Rome, GA MSA	73	49.3%	361	20.0%	2.47	180
13 GA	12020 Athens-Clarke County, GA MSA	283	49.0%	784	19.9%	2.46	179
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	26,558	38.9%	22,259	15.8%	2.46	179
45 SC	43900 Spartanburg, SC MSA	463	57.0%	1,276	23.2%	2.46	176
43 3C 24 MD	12580 Baltimore-Towson, MD MSA	11,228	44.0%	15.843	18.1%	2.44	176
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	2,237	46.5%	12,056	19.1%	2.43	176 175
37 NC	24660 Greensboro-High Point, NC MSA	1,453	43.1%	2,672	17.9%	2.43	173
12 FL	27260 Jacksonville, FL MSA	3,829	52.3%	9,289	21.7%	2.41	173
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	195	56.5%	9,269 1,846	23.5%	2.40	173
42 PA	39740 Reading, PA MSA	133	42.6%	2,009	17.8%	2.40	172
51 VA	<u> </u>	247	50.5%	,		2.39	
-	19260 Danville, VA MSA			310	21.1%		170
45 SC	22500 Florence, SC MSA	598	59.4%	678 3,264	24.8%	2.39 2.39	169
22 LA	12940 Baton Rouge, LA MSA	2,348	54.6%	,	22.8%		168
26 MI	24340 Grand Rapids-Wyoming, MI MSA	735	56.1%	5,772	23.5%	2.39	167
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	3,887	51.1%	11,120	21.4%	2.39	166
13 GA	31420 Macon, GA MSA	989	59.0%	858	24.8%	2.38	165
18 IN	26900 Indianapolis, IN MSA	2,457	45.7%	10,104	19.3%	2.37	164
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	13,588	66.5%	11,260	28.1%	2.37	163
45 SC	11340 Anderson, SC MSA	185	53.2%	820	22.5%	2.36	162
01 AL	33660 Mobile, AL MSA	1,146	55.1%	1,602	23.3%	2.36	161
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	493	48.0%	6,161	20.4%	2.36	160
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,138	35.7%	13,051	15.1%	2.36	159

Table 1 - NCRC Analysis: African-American/White

State	MSA	# High-Cost Loans to African- Americans	% High-Cost Loans to African- Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
37 NC	15500 Burlington, NC MSA	230	48.3%	580	20.6%	2.35	158
47 TN	27180 Jackson, TN MSA	444	60.2%	594	25.7%	2.34	157
39 OH	10420 Akron, OH MSA	850	49.4%	4,109	21.1%	2.34	156
22 LA	43340 Shreveport-Bossier City, LA MSA	1,089	52.8%	1,573	22.5%	2.34	155
51 VA	40220 Roanoke, VA MSA	353	44.7%	1,545	19.1%	2.34	154
IN+KY	21780 Evansville, IN-KY MSA	138	49.3%	1962	21.1%	2.34	153
26 MI	28020 Kalamazoo-Portage, MI MSA	286	51.9%	2,012	22.2%	2.34	152
42 PA	42540 ScrantonWilkes-Barre, PA MSA	81	51.9%	2,821	22.3%	2.33	151
09 CT	35300 New Haven-Milford, CT MSA	1,284	48.6%	5,133	20.9%	2.32	150
21 KY	30460 Lexington-Fayette, KY MSA	327	38.9%	2,039	16.8%	2.32	149
12 FL	37460 Panama City-Lynn Haven, FL MSA	139	42.8%	997	18.5%	2.31	148
42 PA	29540 Lancaster, PA MSA	60	33.7%	1,880	14.6%	2.31	147
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	1108	47.9%	11645	20.8%	2.30	146
45 SC	44940 Sumter, SC MSA	312	54.8%	311	23.9%	2.30	145
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	2,837	35.6%	6,489	15.5%	2.29	144
17 IL	37900 Peoria, IL MSA	216	43.3%	1,906	18.9%	2.29	143
05 AR	30780 Little Rock-North Little Rock, AR MSA	996	40.9%	2,635	17.9%	2.28	142
42 PA	38300 Pittsburgh, PA MSA	917	48.2%	10,778	21.1%	2.28	141
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	13,587	42.4%	22,891	18.6%	2.28	140
22 LA	29180 Lafayette, LA MSA	612	55.2%	1,343	24.3%	2.27	139
29 MO	44180 Springfield, MO MSA	63	48.1%	2,996	21.3%	2.26	138
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	499	60.9%	3636	27.1%	2.25	137
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	310	51.6%	1,130	23.0%	2.24	136
17 IL	16580 Champaign-Urbana, IL MSA	107	32.5%	748	14.5%	2.24	135
39 OH	18140 Columbus, OH MSA	2,232	41.5%	9,207	18.5%	2.24	134
IN+KY	31140 Louisville, KY-IN MSA	1,371	45.1%	7,043	20.2%	2.23	133
48 TX	19124 Dallas-Plano-Irving, TX MD	6,993	51.7%	19,361	23.1%	2.23	132
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	309	51.4%	2038	23.1%	2.22	131
53 WA	14740 Bremerton-Silverdale, WA MSA	65	39.2%	1,601	17.7%	2.22	130
33 NH	31700 Manchester-Nashua, NH MSA	77	36.8%	2,569	16.7%	2.21	129
18 IN	33140 Michigan City-La Porte, IN MSA	97	59.1%	740	26.9%	2.20	128
19 IA	19780 Des Moines, IA MSA	180	45.9%	4,155	20.9%	2.20	127
39 OH	30620 Lima, OH MSA	106	57.6%	674	26.3%	2.19	126
26 MI	35660 Niles-Benton Harbor, MI MSA	217	53.3%	1,034	24.3%	2.19	125
34 NJ	15804 Camden, NJ MD	2,780	41.7%	7,687	19.1%	2.19	124
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	2,588	46.0%	9,424	21.1%	2.18	123
39 OH	45780 Toledo, OH MSA	694	48.4%	3,723	22.2%	2.18	122
37 NC	22180 Fayetteville, NC MSA	823	32.6%	870	15.0%	2.18	121
01 AL	23460 Gadsden, AL MSA	128	66.0%	629	30.3%	2.17	120
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	379	37.9%	4650	17.4%	2.17	119
48 TX	30980 Longview, TX MSA	233	62.8%	926	29.0%	2.17	118
40 OK	36420 Oklahoma City, OK MSA	1,151	51.3%	7,077	23.9%	2.15	117
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	591	39.3%	14999	18.3%	2.15	116
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	1,062	36.1%	1,587	16.9%	2.14	115
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	555	45.0%	2,702	21.1%	2.13	114
08 CO	19740 Denver-Aurora, CO MSA	1,716	40.5%	18,690	19.0%	2.13	113
48 TX	47380 Waco, TX MSA	209	57.7%	1,026		2.13	112

Table 1 - NCRC Analysis: African-American/White

24 MD DE+MD+NJ 36 NY 26 MI 34 NJ 26 KY 02 AK 36 NY 02 AK 36 NY 13 GA 06 CA 37 NC 06 CA 34 NJ 20 KS 48 TX 01 AL 26 MI 26 MI 27 MI 28 TX 39 OH 09 CT	10500 Albany, GA MSA 41540 Salisbury, MD MSA 48864 Wilmington, DE-MD-NJ MD 35004 Nassau-Suffolk, NY MD 29620 Lansing-East Lansing, MI MSA 20764 Edison, NJ MD 28740 Kingston, NY MSA	546 281 1,539 3,895 521	53.8% 52.7% 38.2%	524 785	25.4%		
DE+MD+NJ 36 NY 26 MI 34 NJ 36 NY 02 AK 36 NY 13 GN 13 GA 13 GA 06 CA 37 NC 06 CA 34 NJ 20 KS 48 TX 01 AL 26 MI 28 TX 39 OH 09 CT	48864 Wilmington, DE-MD-NJ MD 35004 Nassau-Suffolk, NY MD 29620 Lansing-East Lansing, MI MSA 20764 Edison, NJ MD	1,539 3,895		785		2.12	111
36 NY 26 MI 34 NJ 36 NY 27 AK 38 NY 38 NY 39 NY 39 NY 39 NY 30 NY 31 GA 32 NC 33 NC 34 NJ 35 NC 36 CA 37 NC 37 NC 37 NC 38 NC 39 NC 31 NC 32 NC 33 NC 34 NJ 35 NC 36 CA 37 NC 37 NC 38 NC 39 NC 30 NC	35004 Nassau-Suffolk, NY MD 29620 Lansing-East Lansing, MI MSA 20764 Edison, NJ MD	3,895	38.2%	, 50	24.9%	2.12	110
36 NY 26 MI 24 NJ 26 NY 27 NY 28 NY 29 AK 29 NY 20 AK 21 NY 20 AK 21 NY 21 NY 22 NY 23 NY 24 NJ 25 NY 26 NY 27 NY 28 NY 29 NY 20 NS 20 NS 21 NY 21 NS 22 NS 23 NS 24 NJ 25 NS 26 NI 26 NI 27 NS 28 NS	35004 Nassau-Suffolk, NY MD 29620 Lansing-East Lansing, MI MSA 20764 Edison, NJ MD			3,798	18.1%	2.11	109
34 NJ 36 NY 02 AK 36 NY 11 36 NY 12 13 GA 06 CA 37 NC 06 CA 34 NJ 20 KS 48 TX 11 39 OH 09 CT	20764 Edison, NJ MD	521	47.5%	14,839	22.5%	2.11	108
36 NY 02 AK 136 NY 14 +GA 13 GA 06 CA 13 7 NC 16 CA 14 NJ 17			53.0%	3,572	25.1%	2.11	107
36 NY 02 AK 36 NY 14 AL+GA 13 GA 06 CA 37 NC 06 CA 34 NJ 20 KS 48 TX 01 AL 26 MI 28 TX 39 OH 09 CT		1,694	34.6%	11,741	16.4%	2.11	106
36 NY AL+GA 13 GA 20 6 CA 37 NC 06 CA 34 NJ 20 KS 48 TX 01 AL 26 MI 28 TX 39 OH 09 CT	<u> </u>	78	43.1%	844	20.5%	2.11	105
36 NY AL+GA 13 GA 20 6C CA 37 NC 20 6C CA 34 NJ 20 KS 48 TX 01 AL 26 MI 28 TX 39 OH 09 CT	11260 Anchorage, AK MSA	149	29.9%	1,631	14.2%	2.10	104
AL+GA 1 13 GA 2 06 CA 3 7 NC 2 06 CA 4 34 NJ 1 20 KS 4 48 TX 1 01 AL 2 6 MI 2 48 TX 3 9 OH 1 09 CT 3	10580 Albany-Schenectady-Troy, NY MSA	265	37.0%	3,706	17.6%	2.10	103
06 CA 37 NC 2 2 06 CA 4 34 NJ 1 2 0 KS 4 8 TX 1 1 2 6 MI 2 8 TX 39 OH 1 9 CT 3 3	17980 Columbus, GA-AL MSA	893	43.9%	923	21.0%	2.09	102
06 CA 37 NC 2 2 06 CA 4 34 NJ 1 2 0 KS 4 8 TX 1 1 2 6 MI 2 8 TX 39 OH 1 9 CT 3 3	23580 Gainesville, GA MSA	114	45.4%	1,081	21.8%	2.08	101
37 NC 2 06 CA 4 34 NJ 1 20 KS 4 8 TX 1 01 AL 2 26 MI 24 8 TX 1 39 OH 1 09 CT 3	36084 Oakland-Fremont-Hayward, CA MD	3,662	32.3%	11,825	15.5%	2.08	100
06 CA 4 4 34 NJ 1 1 20 KS 4 8 TX 1 1 2 6 MI 2 4 8 TX 1 3 9 OH 1 9 CT 3 3	27340 Jacksonville, NC MSA	104	24.6%	404	11.9%	2.08	99
34 NJ 1 20 KS 4 48 TX 1 01 AL 2 26 MI 2 48 TX 1 39 OH 1	40900 SacramentoArden-ArcadeRoseville, CA MSA	2,859	40.6%	16,490	19.6%	2.07	98
20 KS 4 48 TX 1 01 AL 2 6 MI 2 48 TX 1 39 OH 1 09 CT 3	12100 Atlantic City, NJ MSA	558	47.7%	2,110	23.0%	2.07	97
48 TX 1 01 AL 2 26 MI 2 48 TX 1 39 OH 1 09 CT 3	48620 Wichita, KS MSA	325	45.0%	3,322	21.7%	2.07	96
01 AL 22 6 MI 248 TX 139 OH 109 CT 3	13140 Beaumont-Port Arthur, TX MSA	427	50.1%	1,163	24.2%	2.07	95
26 MI 48 TX 39 OH 09 CT	20020 Dothan, AL MSA	250	58.5%	854	28.4%	2.06	94
48 TX 1 39 OH 1 09 CT 3	22420 Flint, MI MSA	998	53.3%	3,333	25.9%	2.06	93
39 OH 1 09 CT 3	12420 Austin-Round Rock, TX MSA	617	32.2%	5,503	15.7%	2.05	92
09 CT 3	15940 Canton-Massillon, OH MSA	271	54.9%	2,852	26.9%	2.04	91
	35980 Norwich-New London, CT MSA	130	39.8%	1,610	19.5%	2.04	90
	12980 Battle Creek, MI MSA	187	57.4%	1,170	28.3%	2.02	89
	40420 Rockford, IL MSA	313	54.4%	2,822	27.0%	2.02	88
	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	778	56.5%	5,833	28.1%	2.01	87
	14540 Bowling Green, KY MSA	50	44.2%	599	22.0%	2.01	86
	26420 Houston-Sugar Land-Baytown, TX MSA	11,633	59.1%	30,038	29.5%	2.01	85
	41620 Salt Lake City, UT MSA	91	42.5%	8,369	21.2%	2.00	84
	34740 Muskegon-Norton Shores, MI MSA	282	58.8%	1,406	29.3%	2.00	83
	26380 Houma-Bayou Cane-Thibodaux, LA MSA	159	57.0%	1,150	28.5%	2.00	82
	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	692	42.9%	3,451	21.5%	2.00	81
	29404 Lake County-Kenosha County, IL-WI MD	527	39.6%	6639	19.9%	1.99	80
	36100 Ocala, FL MSA	417	51.2%	2,534	25.8%	1.98	79
	31180 Lubbock, TX MSA	72	46.5%	1,176	23.5%	1.98	78
	47580 Warner Robins, GA MSA	313	35.6%	543	18.1%	1.97	77
	39900 Reno-Sparks, NV MSA	87	34.8%	3,396	17.7%	1.97	76
	42220 Santa Rosa-Petaluma, CA MSA	58	24.1%	2,246	12.2%	1.97	75
	19460 Decatur, AL MSA	197	56.8%	922	28.9%	1.96	74
	45104 Tacoma, WA MD	814	46.5%	7,268	23.7%	1.96	73
	45300 Tampa-St. Petersburg-Clearwater, FL MSA	4,560	52.0%	28,368	26.5%	1.96	73 72
	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	9,762	52.7%	17,931	26.9%	1.96	71
	28940 Knoxville, TN MSA	360	46.5%	4,940	23.8%	1.95	70
	46140 Tulsa, OK MSA	601	53.9%	5,616	27.7%	1.95	70 69
	37340 Palm Bay-Melbourne-Titusville, FL MSA	833	43.1%	5,125	22.2%	1.94	68
I		1,135	43.1% 51.7%	5,125 4,804	22.2% 26.8%	1.93	68 67
	38940 Port St. Lucie-Fort Pierce, FL MSA	72		4,604	∠0.6%1	1.931	67
48 TX 2	21140 Elkhart-Goshen, IN MSA	70	47.4%	1,358	24.6%	1.92	66

Table 1 - NCRC Analysis: African-American/White

12 FL 3 12 FL 3 12 FL 3 MD+WV 2 MD+WV 2 M6 CA 4 GA+TN 1 17 IL 1 01 AL 12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 2 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	46660 Valdosta, GA MSA 39460 Punta Gorda, FL MSA 36740 Orlando-Kissimmee, FL MSA 36740 Monroe, LA MSA 25180 Hagerstown-Martinsburg, MD-WV MSA 45060 Syracuse, NY MSA 41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	250 128 4,728 338 235 111 1,107 732 59 131 144 760 76	48.7% 45.1% 49.2% 54.4% 38.8% 30.7% 27.3% 54.7% 36.6% 47.1%	631 1,552 21,561 860 2375 2,023 14,152 3954 458 778	25.4% 23.7% 26.3% 29.3% 20.9% 16.6% 14.7% 29.7% 20.0%	1.92 1.90 1.87 1.86 1.86 1.86 1.85	64 63 62 61 60 59 58 57
12 FL 3 22 LA 3 MD+WV 2 36 NY 4 06 CA 4 GA+TN 1 17 IL 1 01 AL 2 IL+IA 1 12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 10 KS 4 04 AZ 3	36740 Orlando-Kissimmee, FL MSA 33740 Monroe, LA MSA 25180 Hagerstown-Martinsburg, MD-WV MSA 45060 Syracuse, NY MSA 41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	4,728 338 235 111 1,107 732 59 131 144 760	49.2% 54.4% 38.8% 30.7% 27.3% 54.7% 36.6% 47.1%	21,561 860 2375 2,023 14,152 3954 458	26.3% 29.3% 20.9% 16.6% 14.7% 29.7% 20.0%	1.87 1.86 1.86 1.86 1.85	62 61 60 59 58 57
22 LA 3 MD+WV 2 36 NY 4 06 CA 4 GA+TN 1 17 IL 1 01 AL 2 IL+IA 1 12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	33740 Monroe, LA MSA 25180 Hagerstown-Martinsburg, MD-WV MSA 45060 Syracuse, NY MSA 41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	338 235 111 1,107 732 59 131 144 760	54.4% 38.8% 30.7% 27.3% 54.7% 36.6% 47.1%	860 2375 2,023 14,152 3954 458	29.3% 20.9% 16.6% 14.7% 29.7% 20.0%	1.86 1.86 1.86 1.85 1.84	61 60 59 58 57
MD+WV 2 36 NY 4 06 CA 4 GA+TN 1 17 IL 1 01 AL 2 IL+IA 1 12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 208 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 10 KS 4 04 AZ 3	25180 Hagerstown-Martinsburg, MD-WV MSA 45060 Syracuse, NY MSA 41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	235 111 1,107 732 59 131 144 760	38.8% 30.7% 27.3% 54.7% 36.6% 47.1%	2375 2,023 14,152 3954 458	20.9% 16.6% 14.7% 29.7% 20.0%	1.86 1.86 1.85 1.84	60 59 58 57
36 NY 4 06 CA 4 GA+TN 1 1 17 IL 101 AL 2 IL+IA 1 1 12 FL 153 WA 3 28 MS 01 AL 1 1 28 MS 2 04 AZ 4 4 2 2 LA 2 08 CO 1 06 CA 3 18 IN 3 9 OH 3 15 HI 2 CO KS 4 04 AZ 3 18 FL 2 CO KS 4 04 AZ 3 3	45060 Syracuse, NY MSA 41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	111 1,107 732 59 131 144 760	30.7% 27.3% 54.7% 36.6% 47.1%	2,023 14,152 3954 458	16.6% 14.7% 29.7% 20.0%	1.86 1.85 1.84	59 58 57
06 CA 4 GA+TN 1 17 IL 1 01 AL 2 IL+IA 1 153 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 20 KS 4 15 FL 2 06 CA 4 15 IN 1 16 CA 4 17 IN 10 IN	41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	1,107 732 59 131 144 760	27.3% 54.7% 36.6% 47.1%	14,152 3954 458	14.7% 29.7% 20.0%	1.85 1.84	58 57
06 CA 4 GA+TN 1 17 IL 1 01 AL 1 L+IA 1 12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	41740 San Diego-Carlsbad-San Marcos, CA MSA 16860 Chattanooga, TN-GA MSA 19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	732 59 131 144 760	54.7% 36.6% 47.1%	3954 458	29.7% 20.0%	1.84	57
17 IL 1 01 AL 2 IL+IA 1 12 FL 1 53 WA 3 01 AL 1 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	19500 Decatur, IL MSA 22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	59 131 144 760	36.6% 47.1%	458	20.0%	-	
01 AL 2 IL+IA 1 12 FL 1 53 WA 3 01 AL 1 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	131 144 760	47.1%			1 00	
01 AL 2 IL+IA 1 12 FL 1 53 WA 3 01 AL 1 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	22520 Florence-Muscle Shoals, AL MSA 19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	144 760				1.83	56
IL+IA 1 12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 0 KS 4 04 AZ 3	19340 Davenport-Moline-Rock Island, IA-IL MSA 15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA	760	47.1%		25.9%	1.82	55
12 FL 1 53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 208 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 10 KS 4 04 AZ 3	15980 Cape Coral-Fort Myers, FL MSA 36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA			2731	25.9%	1.82	54
53 WA 3 28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	36500 Olympia, WA MSA 37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA		55.4%	9,228	30.6%	1.81	53
28 MS 3 01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	37700 Pascagoula, MS MSA 11500 Anniston-Oxford, AL MSA		31.1%	1,566	17.2%	1.81	52
01 AL 1 28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	11500 Anniston-Oxford, AL MSA	199	52.2%	833	29.0%	1.80	51
28 MS 2 04 AZ 4 22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3		193	53.0%	690	29.5%	1.80	50
04 AZ	25060 Gulfport-Biloxi, MS MSA	224	42.4%	1,037	23.6%	1.80	49
22 LA 2 08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	46060 Tucson, AZ MSA	320	36.6%	7,989	20.4%	1.79	48
08 CO 1 06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	29340 Lake Charles, LA MSA	270	49.0%	956	27.3%	1.79	47
06 CA 3 18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	17820 Colorado Springs, CO MSA	355	31.5%	4,375	17.8%	1.77	46
18 IN 1 39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	136	26.8%	4,509	15.2%	1.77	45
39 OH 3 15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	11300 Anderson, IN MSA	84	53.8%	1,114	30.7%	1.76	44
15 HI 2 06 CA 4 12 FL 2 20 KS 4 04 AZ 3	31900 Mansfield, OH MSA	73	42.7%	815	24.6%	1.74	43
06 CA 4 12 FL 2 20 KS 4 04 AZ 3	26180 Honolulu, HI MSA	116	24.0%	1,019	13.9%	1.73	42
12 FL 20 KS 4 04 AZ 3	46700 Vallejo-Fairfield, CA MSA	1,197	35.8%	3,036	20.8%	1.72	41
20 KS 4 04 AZ 3	29460 Lakeland, FL MSA	1,081	56.0%	5,887	32.6%	1.72	40
04 AZ 3	45820 Topeka, KS MSA	77	37.6%	1,399	22.0%	1.71	39
	38060 Phoenix-Mesa-Scottsdale, AZ MSA	3,048	42.6%	57,200	25.0%	1.71	38
	42044 Santa Ana-Anaheim-Irvine, CA MD	399	26.9%	13,455	15.8%	1.70	37
	44220 Springfield, OH MSA	84	46.4%	983	27.3%	1.70	36
	10780 Alexandria, LA MSA	261	55.7%	823	32.9%	1.69	35
	47220 Vineland-Millville-Bridgeton, NJ MSA	220	47.3%	941	28.0%	1.69	34
-	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	281	22.8%	5,900	13.6%	1.68	33
	17300 Clarksville, TN-KY MSA	307	31.4%	1196	18.9%	1.66	32
	23020 Fort Walton Beach-Crestview-Destin, FL MSA	125	27.0%	1,113	16.3%	1.66	31
	27100 Jackson, MI MSA	121	51.9%	1,717	31.9%	1.63	30
	31084 Los Angeles-Long Beach-Glendale, CA MD	11,550	38.4%	53,882	23.6%	1.63	29
	49700 Yuba City, CA MSA	85	42.9%	1,644	27.0%	1.59	28
	45500 Texarkana, TX-Texarkana, AR MSA	143	48.3%	625	30.5%	1.58	27
	25620 Hattiesburg, MS MSA	196	48.2%	786	30.4%	1.58	26
	20100 Dover, DE MSA	296	31.8%	936	20.2%	1.57	25
-	29820 Las Vegas-Paradise, NV MSA	3,117	43.8%	23,991	28.3%	1.55	24
	47300 Visalia-Porterville, CA MSA	90	49.7%	4,028	32.2%	1.55	23
	33124 Miami-Miami Beach-Kendall, FL MD	6,793	56.5%	30,362	36.7%	1.54	22
	23420 Fresno, CA MSA	596	44.5%	7,946	29.2%	1.52	21
	12540 Bakersfield, CA MSA	729	48.8%	10,124	32.4%	1.51	20
	40140 Riverside-San Bernardino-Ontario, CA MSA	7,104	45.3%	54,024	30.2%	1.50	19
	44700 Stockton, CA MSA	1,303	43.3%	7,569		1.49	18

Table 1 - NCRC Analysis: African-American/White

State	MSA	# High-Cost Loans to African- Americans	% High-Cost Loans to African- Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
48 TX	18580 Corpus Christi, TX MSA	76	43.4%	2,162	29.1%	1.49	17
21 KY	21060 Elizabethtown, KY MSA	125	41.3%	831	27.7%	1.49	16
06 CA	31460 Madera, CA MSA	64	44.4%	1,547	30.2%	1.47	15
06 CA	25260 Hanford-Corcoran, CA MSA	69	44.5%	1,126	30.4%	1.47	14
35 NM	10740 Albuquerque, NM MSA	143	27.4%	4,984	18.9%	1.45	13
40 OK	30020 Lawton, OK MSA	162	34.1%	516	23.7%	1.44	12
06 CA	33700 Modesto, CA MSA	338	40.0%	6,804	27.9%	1.43	11
VA+WV	49020 Winchester, VA-WV MSA	67	34.4%	1430	24.2%	1.42	10
AR+OK	22900 Fort Smith, AR-OK MSA	63	45.0%	1857	32.2%	1.40	9
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	341	21.4%	1,136	16.1%	1.33	8
05 AR	38220 Pine Bluff, AR MSA	166	37.1%	262	28.4%	1.31	7
06 CA	41500 Salinas, CA MSA	56	23.5%	2,265	19.4%	1.22	6
06 CA	32900 Merced, CA MSA	118	37.9%	3,103	32.4%	1.17	5
13 GA	25980 Hinesville-Fort Stewart, GA MSA	179	33.5%	269	28.9%	1.16	4
48 TX	41700 San Antonio, TX MSA	669	28.2%	9,801	25.0%	1.13	3
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	256	7.7%	2,658	6.9%	1.12	2
48 TX	21340 El Paso, TX MSA	121	27.0%	4,156	31.9%	0.85	1

Table 2 - NCRC Analysis: LMI African-American/LMI White

State	MSA	# High-Cost Loans to LMI African- Americans	% High-Cost Loans to LMI African- Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
51 VA	16820 Charlottesville, VA MSA	154	48.0%	275	15.2%	3.16	195
37 NC	48900 Wilmington, NC MSA	187	56.5%	498	18.5%	3.06	194
37 NC	24780 Greenville, NC MSA	153	48.3%	112	16.4%	2.95	193
37 NC	20500 Durham, NC MSA	598	48.0%	413	16.4%	2.94	192
37 NC	39580 Raleigh-Cary, NC MSA	1,332	49.4%	1,711	18.1%	2.73	191
25 MA	15764 Cambridge-Newton-Framingham, MA MD	173	36.1%	1,622	13.2%	2.73	190
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	2,651	66.5%	3,618	25.0%	2.66	189
51 VA	31340 Lynchburg, VA MSA	200	59.7%	416	22.5%	2.66	188
42 PA	25420 Harrisburg-Carlisle, PA MSA	216	53.9%	1,091	20.6%	2.61	187
26 MI	11460 Ann Arbor, MI MSA	270	52.0%	652	20.0%	2.60	186
12 FL	34940 Naples-Marco Island, FL MSA	76	56.3%	478	22.0%	2.56	185
51 VA	40060 Richmond, VA MSA	3,035	54.5%	2,458	21.8%	2.50	184
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,796			23.9%	2.49	183
IL+MO	41180 St. Louis, MO-IL MSA	5,668			27.6%	2.44	182
36 NY	15380 Buffalo-Niagara Falls, NY MSA	239			20.7%	2.43	181
45 SC	16700 Charleston-North Charleston, SC MSA	848			23.9%	2.41	180
25 MA	49340 Worcester, MA MSA	170			21.1%	2.40	179
37 NC	40580 Rocky Mount, NC MSA	261	61.0%	,	25.5%	2.40	178
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	52		174	6.3%	2.39	177
01 AL	12220 Auburn-Opelika, AL MSA	108		180	22.2%	2.37	176
01 AL	46220 Tuscaloosa, AL MSA	258			21.7%	2.36	175
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	3,633			22.0%	2.35	174
12 FL	23540 Gainesville, FL MSA	212		359	25.4%	2.35	173
13 GA	42340 Savannah, GA MSA	418			21.6%	2.33	173
48 TX	46340 Tyler, TX MSA	108			28.2%	2.32	172
40 TX 42 PA	37964 Philadelphia, PA MD	3,871	48.4%		20.9%	2.32	170
42 PA	49620 York-Hanover, PA MSA	68			22.8%	2.29	169
51 VA		140		1,065	25.3%	2.29	168
	19260 Danville, VA MSA	655		449			167
01 AL	33860 Montgomery, AL MSA	539		-		2.27	166
25 MA	14484 Boston-Quincy, MA MD			1,713		2.26	
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	121	63.4%		28.1%	2.26	165
17 IL	16974 Chicago-Naperville-Joliet, IL MD	12,223	61.6%		27.8%	2.21	164
34 NJ	45940 Trenton-Ewing, NJ MSA	447	48.3%		21.9%	2.21	163
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	371	63.4%		28.7%	2.21	162
17 IL	44100 Springfield, IL MSA	56				2.20	161
39 OH	19380 Dayton, OH MSA	760		2,185	27.6%	2.19	160
18 IN	23844 Gary, IN MD	799		1,980	30.4%	2.18	159
25 MA	44140 Springfield, MA MSA	240			24.7%	2.17	158
01 AL	26620 Huntsville, AL MSA	562			24.5%	2.17	157
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	2,520				2.17	156
18 IN	23060 Fort Wayne, IN MSA	256		1,481	27.9%	2.17	155
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	1,573			24.8%	2.17	154
NJ+PA	35084 Newark-Union, NJ-PA MD	1,734	48.5%		22.5%	2.16	153
12 FL	37460 Panama City-Lynn Haven, FL MSA	70			27.2%	2.15	152
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	4,203			34.1%	2.14	151
45 SC	17900 Columbia, SC MSA	1,221	54.2%	1,199	25.5%	2.12	150

Table 2 - NCRC Analysis: LMI African-American/LMI White

State	MSA	# High-Cost Loans to LMI African- Americans	% High-Cost Loans to LMI African- Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
KS+MO	28140 Kansas City, MO-KS MSA	2189				2.12	149
36 NY	40380 Rochester, NY MSA	313	45.2%	1,666	21.4%	2.11	148
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	632	45.4%	1,424	21.6%	2.11	147
55 WI	39540 Racine, WI MSA	127	55.0%	729	26.1%	2.10	146
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	318	71.6%	1779	34.1%	2.10	145
13 GA	12020 Athens-Clarke County, GA MSA	137	54.2%	286	26.0%	2.08	144
25 MA	21604 Essex County, MA MD	99	35.4%	1,204	17.0%	2.08	143
45 SC	24860 Greenville, SC MSA	471	58.3%	1,236	28.0%	2.08	142
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	824	46.7%	2,862	22.5%	2.08	141
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	12,127	43.4%	7,314	21.0%	2.07	140
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	2,443	48.8%	3,309	23.6%	2.07	139
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	1,333	53.8%	5,962	26.1%	2.06	138
12 FL	45220 Tallahassee, FL MSA	396	49.7%	519	24.1%	2.06	137
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	1,459	55.2%	1,271	27.0%	2.05	136
37 NC	15500 Burlington, NC MSA	136	56.0%	256	27.4%	2.05	135
39 OH	10420 Akron, OH MSA	550	60.5%	2,210	29.6%	2.04	134
34 NJ	20764 Edison, NJ MD	575	38.0%	3,743	18.6%	2.04	133
37 NC	49180 Winston-Salem, NC MSA	380	44.5%	787	21.9%	2.03	132
37 NC	22180 Fayetteville, NC MSA	280	43.1%	257	21.3%	2.03	131
18 IN	26900 Indianapolis, IN MSA	1,592	53.6%	5,263	26.5%	2.03	130
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	192	52.2%	1,542	25.8%	2.03	129
IN+KY	21780 Evansville, IN-KY MSA	92	60.1%	1088		2.02	128
28 MS	27140 Jackson, MS MSA	1,165	64.5%	525	32.0%	2.02	127
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	119	62.3%	900	31.1%	2.00	126
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	1,343		2,579		1.99	125
24 MD	12580 Baltimore-Towson, MD MSA	5,607	50.2%	6,372	25.3%	1.99	124
26 MI	24340 Grand Rapids-Wyoming, MI MSA	446	60.7%	3,202	30.6%	1.98	123
22 LA	43340 Shreveport-Bossier City, LA MSA	573	61.9%	511	31.3%	1.97	122
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	13,490	49.0%	10,470	24.8%	1.97	121
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	550	46.8%	677	23.8%	1.97	120
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	144	47.4%	1996	24.1%	1.96	119
45 SC	43900 Spartanburg, SC MSA	275	59.7%	596	30.4%	1.96	118
17 IL	37900 Peoria, IL MSA	139	52.5%	1,056	26.8%	1.96	117
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	7,097	73.6%	4,182	37.7%	1.95	116
13 GA	47580 Warner Robins, GA MSA	155	43.1%	234	22.1%	1.95	115
36 NY	35004 Nassau-Suffolk, NY MD	928	40.9%	2,874	21.0%	1.95	114
12 FL	27260 Jacksonville, FL MSA	1,886	60.5%	3,456	31.1%	1.95	113
22 LA	12940 Baton Rouge, LA MSA	1,336	62.1%	1,273	32.0%	1.94	112
26 MI	29620 Lansing-East Lansing, MI MSA	284	61.5%	1,928	31.7%	1.94	111
39 OH	15940 Canton-Massillon, OH MSA	193	66.6%	1,451	34.4%	1.94	110
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,423	39.6%	2,902	20.5%	1.94	109
51 VA	40220 Roanoke, VA MSA	220	49.1%	764	25.4%	1.93	108
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	282	41.9%	3068	21.7%	1.93	107
01 AL	13820 Birmingham-Hoover, AL MSA	2,326	64.5%	2,608	33.5%	1.93	107
20 KS	48620 Wichita, KS MSA	195	54.3%	1,685	28.3%	1.92	105
26 MI	35660 Niles-Benton Harbor, MI MSA	134	63.5%	,	33.2%	1.92	103
IN+KY	31140 Louisville, KY-IN MSA	813	52.4%		27.4%	1.91	104
HIN : IX I	10 1 1-to Louisville, KT-IIN WOA	56				1.91	103

Table 2 - NCRC Analysis: LMI African-American/LMI White

State	MSA	# High-Cost Loans to LMI African- Americans	% High-Cost Loans to LMI African- Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
17 IL	40420 Rockford, IL MSA	184	62.4%	,	32.6%	1.91	101
01 AL	20020 Dothan, AL MSA	141	66.8%	293	35.1%	1.90	100
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	728	26.6%	963	14.0%	1.90	99
06 CA	46700 Vallejo-Fairfield, CA MSA	172	33.9%	326	17.9%	1.89	98
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	521	39.5%	2,397	20.9%	1.89	97
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	164	59.4%	562	31.4%	1.89	96
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	55	44.7%	656	23.7%	1.89	95
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	884	43.8%	1,907	23.3%	1.88	94
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	216	58.1%	1127	30.9%	1.88	93
26 MI	28020 Kalamazoo-Portage, MI MSA	176	59.3%	1,065	31.7%	1.87	92
13 GA	31420 Macon, GA MSA	587	67.8%	358	36.2%	1.87	91
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	73	36.9%	375	19.7%	1.87	90
01 AL	33660 Mobile, AL MSA	602	60.6%	603	32.5%	1.87	89
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	295	62.5%	1,561	33.5%	1.86	88
39 OH	18140 Columbus, OH MSA	1,397	48.1%	4,561	25.9%	1.86	87
17 IL	16580 Champaign-Urbana, IL MSA	68	37.8%	369	20.4%	1.86	86
34 NJ	15804 Camden, NJ MD	1,202	45.6%	3,109	24.6%	1.85	85
37 NC	24660 Greensboro-High Point, NC MSA	757	49.8%	1,250	26.9%	1.85	84
05 AR	30780 Little Rock-North Little Rock, AR MSA	542	46.6%	1,060	25.2%	1.85	83
53 WA	45104 Tacoma, WA MD	242	55.3%	1,858	29.9%	1.85	82
12 FL	36100 Ocala, FL MSA	131	57.7%	662	31.3%	1.85	81
21 KY	30460 Lexington-Fayette, KY MSA	182	44.9%	1,011	24.4%	1.84	80
12 FL	15980 Cape Coral-Fort Myers, FL MSA	220	57.9%	1,491	31.5%	1.84	79
06 CA	36084 Oakland-Fremont-Hayward, CA MD	580	26.2%	1,154	14.3%	1.83	78
39 OH	45780 Toledo, OH MSA	407	52.8%	1,737	28.8%	1.83	77
40 OK	36420 Oklahoma City, OK MSA	592	57.3%	3,032	31.3%	1.83	76
45 SC	11340 Anderson, SC MSA	116		380	31.9%	1.83	75
09 CT	35300 New Haven-Milford, CT MSA	590	48.1%	2,141	26.3%	1.83	74
42 PA	39740 Reading, PA MSA	54	39.7%	854	21.8%	1.82	73
24 MD	41540 Salisbury, MD MSA	124	60.2%	292	33.0%	1.82	72
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	209	48.6%	740		1.82	71
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	248	42.8%	5488	23.6%	1.82	70
02 AK	11260 Anchorage, AK MSA	52	28.4%	606	15.7%	1.81	69
13 GA	10500 Albany, GA MSA	254	66.0%	175	36.6%	1.80	68
47 TN	27180 Jackson, TN MSA	255	67.3%	282	37.4%	1.80	67
34 NJ	12100 Atlantic City, NJ MSA	232	53.0%	656	29.5%	1.79	66
53 WA	42644 Seattle-Bellevue-Everett, WA MD	381	37.2%	4,371	20.8%	1.79	65
26 MI	22420 Flint, MI MSA	576	60.4%	1,523	34.0%	1.78	64
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	1,457	53.5%	4,638	30.2%	1.77	63
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	1,607	58.6%	7,753	33.2%	1.77	62
19 IA	19780 Des Moines, IA MSA	120	50.8%	2,483	28.8%	1.77	61
22 LA	29180 Lafayette, LA MSA	384	63.8%	566	36.1%	1.76	60
AL+GA	17980 Columbus, GA-AL MSA	429	54.6%	338	31.1%	1.76	59
45 SC	44940 Sumter, SC MSA	163	62.9%	111	35.9%	1.75	58
42 PA	38300 Pittsburgh, PA MSA	501	52.7%	4,904	30.2%	1.75	57
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	243		814	28.0%	1.74	56
36 NY	10580 Albany-Schenectady-Troy, NY MSA	140	41.1%		23.7%	1.74	55
08 CO	17820 Colorado Springs, CO MSA	145		,		1.73	54

Table 2 - NCRC Analysis: LMI African-American/LMI White

State	MSA	# High-Cost Loans to LMI African- Americans	% High-Cost Loans to LMI African- Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
45 SC	22500 Florence, SC MSA	311			38.3%	1.73	53
40 OK	46140 Tulsa, OK MSA	328	60.5%	2,422	35.2%	1.72	52
26 MI	34740 Muskegon-Norton Shores, MI MSA	202	63.7%	743	37.2%	1.71	51
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	2,598	53.1%	3,288	31.0%	1.71	50
47 TN	28940 Knoxville, TN MSA	218	58.4%	2,419	34.2%	1.71	49
13 GA	23580 Gainesville, GA MSA	61	48.4%	469	28.5%	1.70	48
KY+TN	17300 Clarksville, TN-KY MSA	130	41.8%	455	24.6%	1.70	47
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	321	47.6%	1,732	28.3%	1.69	46
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	153	38.5%	858	22.9%	1.68	45
08 CO	19740 Denver-Aurora, CO MSA	857	45.3%	8,509	27.0%	1.68	44
26 MI	12980 Battle Creek, MI MSA	126	63.6%	650	38.0%	1.68	43
12 FL	36740 Orlando-Kissimmee, FL MSA	1,664	54.5%	5,710	32.7%	1.67	42
01 AL	11500 Anniston-Oxford, AL MSA	86	59.7%	283	36.2%	1.65	41
48 TX	13140 Beaumont-Port Arthur, TX MSA	191	59.7%	395	36.3%	1.64	40
12 FL	29460 Lakeland, FL MSA	390	61.0%	1,566	37.3%	1.64	39
48 TX	19124 Dallas-Plano-Irving, TX MD	3,005		8,435	35.8%	1.63	38
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	104	21.2%	892	13.0%	1.63	37
48 TX	12420 Austin-Round Rock, TX MSA	315	39.1%	2,547	24.2%	1.62	36
04 AZ	46060 Tucson, AZ MSA	88			28.0%	1.61	35
48 TX	23104 Fort Worth-Arlington, TX MD	995	54.9%	4,653	34.6%	1.58	34
37 NC	24140 Goldsboro, NC MSA	84		109	28.4%	1.58	33
01 AL	19460 Decatur, AL MSA	109		423	37.7%	1.57	32
13 GA	46660 Valdosta, GA MSA	140			39.3%	1.57	31
22 LA	33740 Monroe, LA MSA	166		325	40.4%	1.56	30
GA+TN	16860 Chattanooga, TN-GA MSA	425			39.6%	1.56	29
09 CT	35980 Norwich-New London, CT MSA	62		688	25.2%	1.56	28
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	288			28.6%	1.56	27
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	4,325			43.6%	1.54	26
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	927	32.7%	2,808	21.5%	1.52	25
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	84			33.1%	1.52	24
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	93			33.7%	1.52	23
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	1,164			35.4%	1.52	22
01 AL	22520 Florence-Muscle Shoals, AL MSA	77	51.3%	,	34.1%	1.51	21
40 OK	30020 Lawton, OK MSA	65		200	33.7%	1.49	20
28 MS	37700 Pascagoula, MS MSA	109			44.8%	1.49	19
06 CA	44700 Stockton, CA MSA	97			27.5%	1.48	18
26 MI	27100 Jackson, MI MSA	71	57.7%	888	39.4%	1.46	17
22 LA	29340 Lake Charles, LA MSA	128		369	40.1%	1.45	16
28 MS	25060 Gulfport-Biloxi, MS MSA	91	50.8%	326		1.45	15
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	70			20.9%	1.44	14
06 CA	12540 Bakersfield, CA MSA	128			37.3%	1.42	13
36 NY	45060 Syracuse, NY MSA	55		912	22.2%	1.39	12
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	920		_		1.39	11
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	634			30.1%	1.37	10
22 LA	10780 Alexandria, LA MSA	111	66.1%		48.2%	1.37	9
32 NV	29820 Las Vegas-Paradise, NV MSA	828			35.4%	1.36	8
06 CA	23420 Fresno, CA MSA	108		,	37.0%	1.33	7
10 DE	20100 Dover, DE MSA	87				1.24	6

Table 2 - NCRC Analysis: LMI African-American/LMI White

State	MSA	# High-Cost Loans to LMI African- Americans	% High-Cost Loans to LMI African- Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
28 MS	25620 Hattiesburg, MS MSA	79	52.3%	233	44.1%	1.19	5
AR+TX	45500 Texarkana, TX-Texarkana, AR MSA	62	55.4%	220	48.0%	1.15	4
13 GA	25980 Hinesville-Fort Stewart, GA MSA	51	48.1%	83	44.1%	1.09	3
48 TX	41700 San Antonio, TX MSA	227	43.2%	3,762	40.3%	1.07	2
05 AR	38220 Pine Bluff, AR MSA	66	42.3%	89	40.3%	1.05	1

Table 3 - NCRC Analysis: MUI African-American/MUI White

State	MSA	# High-Cost Loans to MUI African- Americans	% High-Cost Loans to MUI African- Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
37 NC	20500 Durham, NC MSA	517	38.6%	542	8.6%	4.50	225
37 NC	39580 Raleigh-Cary, NC MSA	808	40.6%	1,755	9.8%	4.13	224
51 VA	16820 Charlottesville, VA MSA	90	37.5%	343	9.5%	3.97	223
25 MA	15764 Cambridge-Newton-Framingham, MA MD	398	47.1%	3,256	11.9%	3.95	222
37 NC	24780 Greenville, NC MSA	173	44.5%	261	11.3%	3.95	221
55 WI	31540 Madison, WI MSA	59	39.3%	1,269	10.6%	3.70	220
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	1,194	53.6%	4,347	14.9%	3.59	219
26 MI	11460 Ann Arbor, MI MSA	226	39.9%	618	11.2%	3.58	218
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	502	45.5%	2,420	12.8%	3.57	217
12 FL	23540 Gainesville, FL MSA	180	47.7%	543	13.5%	3.54	216
MN+WI	33461 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,275	56.0%	10,385	15.8%	3.54	215
45 SC	16700 Charleston-North Charleston, SC MSA	726	48.4%	1,931	13.9%	3.49	214
17 IL	28100 Kankakee-Bradley, IL MSA	80	67.8%	391	20.1%	3.38	213
25 MA	21604 Essex County, MA MD	288	55.9%	2,959	16.7%	3.35	212
25 MA	14484 Boston-Quincy, MA MD	2,045	49.0%	5,689	14.7%	3.33	211
42 PA	37964 Philadelphia, PA MD	1,904	38.2%	7,412	11.5%	3.32	210
34 NJ	45940 Trenton-Ewing, NJ MSA	281	43.2%	700	13.2%	3.27	209
IL+MO	41181 St. Louis, MO-IL MSA	2,529	52.2%	8,749	16.4%	3.19	208
51 VA	40060 Richmond, VA MSA	2,146	43.4%	2,953	13.7%	3.17	207
12 FL	45220 Tallahassee, FL MSA	437	45.1%	781	14.3%	3.15	206
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	11,042	44.2%	10,853	14.1%	3.14	205
13 GA 13 GA	42340 Savannah, GA MSA	474	43.8%	797	14.1%	3.13	204
37 NC	48900 Wilmington, NC MSA	163	42.8%	1,131	13.7%	3.12	203
45 SC	24860 Greenville, SC MSA	309	46.1%	1,131	14.8%	3.12	202
45 SC 25 MA	49340 Worcester, MA MSA	338	54.4%	3,317	17.9%	3.10	202
26 MI	· ·	1,659	45.3%	7,346	15.0%	3.03	200
	47644 Warren-Farmington Hills-Troy, MI MD						
37 NC	11700 Asheville, NC MSA	93	51.4%	1,331	17.1%	3.01	199
37 NC	49180 Winston-Salem, NC MSA	356	39.7%	876	13.2%	3.00	198
48 TX	46340 Tyler, TX MSA	140	50.5%	477	17.0%	2.97	197
51 VA	31340 Lynchburg, VA MSA	140	43.5%	520	14.6%	2.97	196
37 NC	24140 Goldsboro, NC MSA	116	38.3%	179	13.0%	2.93	195
25 MA	44140 Springfield, MA MSA	290	51.4%	2,048	17.6%	2.93	194
AR+MS+TN	32821 Memphis, TN-MS-AR MSA	3,775	58.3%	3,114	19.9%	2.92	193
NC+SC	16741 Charlotte-Gastonia-Concord, NC-SC MSA	1,641	38.9%	3,820	13.4%	2.91	192
37 NC	24660 Greensboro-High Point, NC MSA	671	42.5%	1,353	14.6%	2.90	191
IA+NE	36541 Omaha-Council Bluffs, NE-IA MSA	169	48.7%	2,239	16.8%	2.90	190
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	1,531	44.2%	4,948	15.3%	2.89	189
18 IN	23060 Fort Wayne, IN MSA	103	44.8%	875	15.6%	2.88	188
45 SC	43900 Spartanburg, SC MSA	177	56.2%	661	19.5%	2.88	187
NC+VA	47261 Virginia Beach-Norfolk-Newport News, VA-NC MSA	4,029	40.3%	4,877	14.0%	2.88	186
01 AL	33860 Montgomery, AL MSA	459	40.7%	659	14.2%	2.87	185
36 NY	40380 Rochester, NY MSA	138	39.2%	1,423	13.7%	2.87	184
26 MI	24340 Grand Rapids-Wyoming, MI MSA	284	54.5%	2,505	19.1%	2.86	183
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	513	40.7%	2,729	14.3%	2.85	182
42 PA	39740 Reading, PA MSA	71	46.1%	1,090	16.2%	2.84	181
KS+MO	28141 Kansas City, MO-KS MSA	1137	51.1%	7,021	18.2%	2.81	180

Table 3 - NCRC Analysis: MUI African-American/MUI White

State	MSA	# High-Cost Loans to MUI African- Americans	% High-Cost Loans to MUI African- Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
01 AL	26620 Huntsville, AL MSA	349	37.3%	785	13.3%	2.80	179
01 AL	13820 Birmingham-Hoover, AL MSA	1,724	52.2%	3,353	18.7%	2.80	178
36 NY	15380 Buffalo-Niagara Falls, NY MSA	153	41.4%	1,619	14.8%	2.80	177
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	1,822	47.9%	2,817	17.2%	2.78	176
01 AL	46220 Tuscaloosa, AL MSA	233	42.8%	435	15.4%	2.78	175
45 SC	17900 Columbia, SC MSA	875	44.5%	1,419	16.1%	2.76	174
55 WI	39540 Racine, WI MSA	72	41.9%	672	15.2%	2.76	173
48 TX	19124 Dallas-Plano-Irving, TX MD	3,942	53.0%	10,624	19.3%	2.75	172
47 TN	27180 Jackson, TN MSA	187	57.4%	304	20.9%	2.74	171
13 GA	15260 Brunswick, GA MSA	97	54.2%	354	19.9%	2.72	170
42 PA	49620 York-Hanover, PA MSA	157	45.2%	1,476	16.7%	2.72	169
45 SC	22500 Florence, SC MSA	282	54.7%	388	20.1%	2.71	168
37 NC	40580 Rocky Mount, NC MSA	231	46.7%	211	17.3%	2.70	167
28 MS	27140 Jackson, MS MSA	1,171	50.5%	1,227	18.7%	2.70	166
24 MD	12580 Baltimore-Towson, MD MSA	5,465	42.2%	9,060	15.7%	2.70	165
21 KY	30460 Lexington-Fayette, KY MSA	143	35.7%	999	13.3%	2.68	164
18 IN	26900 Indianapolis, IN MSA	846	42.3%	4,654	15.8%	2.67	163
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	192	20.0%	2,351	7.5%	2.67	162
09 CT	35300 New Haven-Milford, CT MSA	679	51.1%	2,906	19.2%	2.66	161
19 IA	19780 Des Moines, IA MSA	58	41.7%	1,621	15.7%	2.65	160
18 IN	23844 Gary, IN MD	566	53.4%	2,276	20.2%	2.65	159
17 IL	37900 Peoria, IL MSA	73	36.9%	811	13.9%	2.65	158
IN+KY+OH	17141 Cincinnati-Middletown, OH-KY-IN MSA	881	41.6%	5,928	15.7%	2.65	157
DC+MD+VA+WV	47895 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	14,062	38.1%	13,830	14.4%	2.64	156
26 MI	28020 Kalamazoo-Portage, MI MSA	107	45.5%	905	17.2%	2.64	155
45 SC	11340 Anderson, SC MSA	67	47.9%	425	18.2%	2.63	154
42 PA	38300 Pittsburgh, PA MSA	409	45.9%	5,719	17.5%	2.63	153
13 GA	12020 Athens-Clarke County, GA MSA	145	47.1%	481	18.0%	2.62	152
53 WA	42644 Seattle-Bellevue-Everett, WA MD	749	36.4%	8,532	13.9%	2.62	151
NJ+PA	35085 Newark-Union, NJ-PA MD	3,073	48.0%	7,103	18.3%	2.62	150
42 PA	25420 Harrisburg-Carlisle, PA MSA	125	35.0%	1,129	13.4%	2.62	149
12 FL 48 TX	46940 Vero Beach, FL MSA 12420 Austin-Round Rock, TX MSA	70 299	55.1% 33.2%	746 2,799	21.1% 12.7%	2.62 2.62	148 147
51 VA	40220 Roanoke, VA MSA	129	41.9%	752	16.2%	2.59	147
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	146	48.0%	551	18.7%	2.59	145
01 AL	33660 Mobile, AL MSA	535	53.0%	971	20.6%	2.57	143
53 WA	14740 Bremerton-Silverdale, WA MSA	52	43.0%	1,096	16.7%	2.57	143
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	73	50.7%	912	19.7%	2.57	143
17 IL	16974 Chicago-Naperville-Joliet, IL MD	13,256	56.5%	39,614	22.1%	2.56	141
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,364	34.4%	3,313	13.5%	2.56	140
08 CO	19740 Denver-Aurora, CO MSA	842	42.7%	9,959	16.7%	2.56	139
12 FL	27260 Jacksonville, FL MSA	1,854	48.9%	5,539	19.1%	2.55	138
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	6,331	63.6%	6,880	25.3%	2.52	137
01 AL	23460 Gadsden, AL MSA	61	65.6%	362	26.2%	2.51	136
IL+WI	29405 Lake County-Kenosha County, IL-WI MD	233	39.8%	3,141	15.9%	2.50	135
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	2,403	52.7%	7,971	21.1%	2.49	134
13 GA	31420 Macon, GA MSA	398	51.8%	491	20.8%	2.49	133
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	1,096				2.48	132

Table 3 - NCRC Analysis: MUI African-American/MUI White

State	MSA	# High-Cost Loans to MUI African- Americans	% High-Cost Loans to MUI African- Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
22 LA	12940 Baton Rouge, LA MSA	997	49.0%	1,907	19.8%	2.47	131
48 TX	17780 College Station-Bryan, TX MSA	55	51.9%	465	21.0%	2.47	130
13 GA	23580 Gainesville, GA MSA	52	47.7%	592	19.3%	2.47	129
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	115	56.9%	1,263	23.0%	2.47	128
01 AL	12220 Auburn-Opelika, AL MSA	83	37.1%	314	15.0%	2.47	127
39 OH	18140 Columbus, OH MSA	816	37.7%	4,511	15.3%	2.46	126
36 NY	10580 Albany-Schenectady-Troy, NY MSA	121	37.5%	2,049	15.2%	2.46	125
39 OH	19380 Dayton, OH MSA	375	39.9%	1,981	16.2%	2.46	124
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	800	52.0%	8,328	21.3%	2.45	123
05 AR	30780 Little Rock-North Little Rock, AR MSA	449	39.2%	1,529	16.1%	2.44	122
12 FL	34940 Naples-Marco Island, FL MSA	164	54.1%	2,318	22.2%	2.44	121
37 NC	15500 Burlington, NC MSA	93	44.3%	315	18.2%	2.43	120
IN+KY	31141 Louisville, KY-IN MSA	548	40.9%	3,509	16.8%	2.43	119
34 NJ	15804 Camden, NJ MD	1,531	41.7%	4,389	17.2%	2.42	118
48 TX	47380 Waco, TX MSA	123	57.2%	643	23.7%	2.41	117
33 NH	31700 Manchester-Nashua, NH MSA	55	39.9%	1,659	16.5%	2.41	116
45 SC	44940 Sumter, SC MSA	147	49.8%	196	20.8%	2.39	115
09 CT	35980 Norwich-New London, CT MSA	65	41.7%	897	17.4%	2.39	114
NJ+PA	10901 Allentown-Bethlehem-Easton, PA-NJ MSA	226	35.3%	2,504	14.9%	2.37	113
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	283	47.0%	4,333	19.9%	2.37	112
36 NY	28740 Kingston, NY MSA	62	48.8%	623	20.6%	2.36	111
51 VA	19260 Danville, VA MSA	104	47.5%	175	20.2%	2.36	110
02 AK	11260 Anchorage, AK MSA	97	33.6%	1,013	14.3%	2.36	109
39 OH	45780 Toledo, OH MSA	280	44.4%	1,910	18.9%	2.35	108
48 TX	30980 Longview, TX MSA	133	61.6%	607	26.2%	2.35	107
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	7,219	58.7%	17,275	25.0%	2.35	106
NJ+NY	35645 New York-White Plains-Wayne, NY-NJ MD	12,563	45.8%	21,168	19.6%	2.34	105
22 LA	43340 Shreveport-Bossier City, LA MSA	510	48.2%	1,045	20.7%	2.33	104
26 MI	29620 Lansing-East Lansing, MI MSA	230	48.4%	1,587	20.8%	2.32	103
40 OK	36420 Oklahoma City, OK MSA	555	47.8%	3,922	20.7%	2.32	102
OR+WA	38901 Portland-Vancouver-Beaverton, OR-WA MSA	338	39.3%	9,322	17.0%	2.31	101
39 OH	10420 Akron, OH MSA	288	37.9%	1,831	16.4%	2.31	100
37 NC	22180 Fayetteville, NC MSA	533	32.8%	598	14.3%	2.29	99
GA+SC	12261 Augusta-Richmond County, GA-SC MSA	503	32.6%	881	14.3%	2.28	98
48 TX	23104 Fort Worth-Arlington, TX MD	1,325	48.1%	5,856	21.2%	2.27	97
36 NY	45060 Syracuse, NY MSA	53	31.2%	1,052	13.7%	2.27	96
22 LA	29180 Lafayette, LA MSA	223	46.2%	759	20.5%	2.25	95
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	339	45.4%	1,883	20.1%	2.25	94
01 AL	20020 Dothan, AL MSA	99	51.8%	449	23.0%	2.25	93
01 AL	19460 Decatur, AL MSA	86	57.0%	489	25.3%	2.25	92
AL+GA	17981 Columbus, GA-AL MSA	457	40.4%	567	18.0%	2.24	91
26 MI	12980 Battle Creek, MI MSA	61	50.0%	510	22.3%	2.24	90
IN+MI	43781 South Bend-Mishawaka, IN-MI MSA	91	41.4%	887	18.5%	2.24	89
26 MI	35660 Niles-Benton Harbor, MI MSA	78	45.6%	538	20.4%	2.24	88
DE+MD+NJ	48865 Wilmington, DE-MD-NJ MD	631	34.7%	1,833	15.5%	2.24	87
24 MD	41540 Salisbury, MD MSA	156	50.3%	476	22.6%	2.23	86
34 NJ	12100 Atlantic City, NJ MSA	320 2,877	48.1% 52.4%	1,375 11,503	21.9% 23.9%	2.20 2.19	85 84

Table 3 - NCRC Analysis: MUI African-American/MUI White

State	MSA	# High-Cost Loans to MUI African- Americans	% High-Cost Loans to MUI African- Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
48 TX	13140 Beaumont-Port Arthur, TX MSA	233	47.0%	758	21.5%	2.19	83
OH+PA	49661 Youngstown-Warren-Boardman, OH-PA MSA	177	50.6%	1,792	23.1%	2.19	82
26 MI	34740 Muskegon-Norton Shores, MI MSA	80	53.7%	647	24.6%	2.18	81
17 IL	40420 Rockford, IL MSA	126	52.1%	1,397	24.3%	2.14	80
22 LA	26380 Houma-Bayou Cane-Thibodaux, LA MSA	86	55.8%	737	26.1%	2.14	79
34 NJ	20764 Edison, NJ MD	1,079	35.3%	7,545	16.5%	2.14	78
06 CA	36084 Oakland-Fremont-Hayward, CA MD	3,058	35.0%	10,568	16.4%	2.14	77
26 MI	22420 Flint, MI MSA	411	48.2%	1,780	22.6%	2.13	76
12 FL	37460 Panama City-Lynn Haven, FL MSA	69	35.4%	678	16.7%	2.12	75
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	531	45.8%	2,516	21.7%	2.11	74
13 GA	10500 Albany, GA MSA	291	48.1%	345	22.8%	2.11	73
06 CA	42220 Santa Rosa-Petaluma, CA MSA	56	27.7%	2,027	13.2%	2.10	72
20 KS	48620 Wichita, KS MSA	127	38.5%	1,583	18.3%	2.10	71
32 NV	39900 Reno-Sparks, NV MSA	63		2,404	17.0%	2.09	70
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	2,318		13,880	20.1%	2.08	69
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	477	42.6%		20.7%	2.06	68
IL+IA	19341 Davenport-Moline-Rock Island, IA-IL MSA	51	43.2%	1202	21.0%	2.06	67
12 FL	39460 Punta Gorda, FL MSA	87	49.4%	1,130	24.2%	2.04	66
37 NC	27340 Jacksonville, NC MSA	79		313		2.03	65
12 FL	36100 Ocala, FL MSA	266		1,764	24.8%	2.02	64
40 OK	46140 Tulsa, OK MSA	267	49.0%	3,133	24.4%	2.01	63
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	832		3,682	27.5%	2.00	62
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	6,895		14,028	27.2%	2.00	61
13 GA	47580 Warner Robins, GA MSA	155		300	16.4%	2.00	60
08 CO	17820 Colorado Springs, CO MSA	209		2,596	17.0%	2.00	59
13 GA	46660 Valdosta, GA MSA	108		359	20.5%	1.99	58
TN+GA	16861 Chattanooga, TN-GA MSA	298		2,095	25.4%	1.99	57
53 WA	45104 Tacoma, WA MD	570		5,362	22.9%	1.99	56
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	2,802		19,589	25.4%	1.99	55
47 TN	28940 Knoxville, TN MSA	141	38.1%	2,457	19.2%	1.98	54
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	462		4,036	27.5%	1.98	53
01 AL	11500 Anniston-Oxford, AL MSA	107	52.7%	398	26.7%	1.97	52
01 AL	22520 Florence-Muscle Shoals, AL MSA	54		415	22.0%	1.96	51
12 FL	36740 Orlando-Kissimmee, FL MSA	2,881	49.4%	14,784	25.5%	1.94	50
28 MS	25060 Gulfport-Biloxi, MS MSA	130			20.9%	1.92	49
53 WA	36500 Olympia, WA MSA	54			16.0%	1.91	48
MD+WV	25181 Hagerstown-Martinsburg, MD-WV MSA	176		1668	20.8%	1.89	47
22 LA	29340 Lake Charles, LA MSA	140		573	23.4%	1.88	46
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	997		13,099	15.4%	1.88	45
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	2,050		37,192	23.0%	1.86	44
21 KY	21060 Elizabethtown, KY MSA	94				1.86	43
04 AZ	46060 Tucson, AZ MSA	229		5,592	19.2%	1.85	42
22 LA	33740 Monroe, LA MSA	165		529	26.6%	1.84	41
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	119		,	15.8%	1.83	40
10 DE	20100 Dover, DE MSA	205			18.4%	1.82	39
12 FL	15980 Cape Coral-Fort Myers, FL MSA	512			31.8%	1.82	38
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	134			27.2%	1.82	37
28 MS	37700 Pascagoula, MS MSA	90	43.3%	480	23.8%	1.82	36

Table 3 - NCRC Analysis: MUI African-American/MUI White

State	MSA	# High-Cost Loans to MUI African- Americans	% High-Cost Loans to MUI African- Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
AR+TX	45501 Texarkana, TX-Texarkana, AR MSA	81	46.3%	387	25.9%	1.79	35
22 LA	10780 Alexandria, LA MSA	150	52.1%	544	29.2%	1.79	34
39 OH	15940 Canton-Massillon, OH MSA	78	40.6%	1,362	22.9%	1.77	33
28 MS	25620 Hattiesburg, MS MSA	116	47.9%	545	27.2%	1.76	32 31
12 FL	29460 Lakeland, FL MSA	657	55.9%	4,098	32.1%	1.74	31
VA+WV	49021 Winchester, VA-WV MSA	50	37.9%	935	21.9%	1.73	30
15 HI	26180 Honolulu, HI MSA	99	25.4%	879	14.8%	1.72	29 28 27
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	242	24.5%	5,096	14.3%	1.72	28
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	79	26.2%	737	15.3%	1.71	27
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	354	28.2%	11,975	16.6%	1.70	26
06 CA	46700 Vallejo-Fairfield, CA MSA	1,019	37.5%	2,674	22.0%	1.70	25
KY+TN	17301 Clarksville, TN-KY MSA	172	29.0%	728	17.6%	1.65	24
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	10,536	40.3%	50,553	24.7%	1.63	24 23 22 21 20
32 NV	29820 Las Vegas-Paradise, NV MSA	2,251	44.4%	18,140	28.2%	1.58	22
35 NM	10740 Albuquerque, NM MSA	99	29.0%	3,257	18.5%	1.57	21
06 CA	49700 Yuba City, CA MSA	80	44.4%	1,490	28.4%	1.57	20
48 TX	18580 Corpus Christi, TX MSA	52	41.6%	1,504	26.9%	1.55	19
06 CA	23420 Fresno, CA MSA	486	44.5%	6,576	28.9%	1.54	18
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	5,465	58.8%	27,500	38.3%	1.54	17
06 CA	47300 Visalia-Porterville, CA MSA	75	49.7%	3,322	32.4%	1.53	16
06 CA	12540 Bakersfield, CA MSA	596	49.2%	8,384	32.6%	1.51	15
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	6,419	46.7%	47,573	31.2%	1.49	14
06 CA	44700 Stockton, CA MSA	1,199	44.7%	6,870	30.1%	1.48	13
06 CA	31460 Madera, CA MSA	56	46.3%	1,347	31.2%	1.48	12 11
06 CA	25260 Hanford-Corcoran, CA MSA	59	43.7%	933	30.1%	1.45	11
40 OK	30020 Lawton, OK MSA	97	29.8%	313	20.7%	1.44	10
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	266	22.6%	818	15.9%	1.42	9
05 AR	38220 Pine Bluff, AR MSA	99	36.7%	167	25.8%	1.42	8
06 CA	33700 Modesto, CA MSA	315	41.4%	6,165	29.3%	1.41	8 7
13 GA	25980 Hinesville-Fort Stewart, GA MSA	125	32.6%	169	24.7%	1.32	6
48 TX	41700 San Antonio, TX MSA	428	27.4%	5,841	21.6%	1.27	5 4
06 CA	41500 Salinas, CA MSA	54	24.7%	2,140	20.5%	1.20	4
06 CA	32900 Merced, CA MSA	106	39.1%	2,905	33.7%	1.16	3
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	181	5.9%	2,262	6.4%	0.93	2 1
48 TX	21340 El Paso, TX MSA	107	28.8%	3,069	32.2%	0.90	1

Table 4 - NCRC Analysis: Hispanic/White

25 MA		Hispanics	Loans to Hispanics	Loans to Whites	Loans to Whites	High-Cost Disparity Ratio	Rank
	15764 Cambridge-Newton-Framingham, MA MD	1,023	42.8%	5,036	12.1%	3.54	241
08 CO	14500 Boulder, CO MSA	193	32.1%	940	9.5%	3.39	240
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,431	22.9%	2,558	7.1%	3.23	239
25 MA	21604 Essex County, MA MD	1,539	49.4%	4,273	16.4%	3.02	238
25 MA	12700 Barnstable Town, MA MSA	129	45.9%	1,487	15.6%	2.94	237
25 MA	14484 Boston-Quincy, MA MD	1,396	39.1%	7,625	14.1%	2.78	236
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	1,372	37.4%	3,949	14.5%	2.57	235
09 CT	35980 Norwich-New London, CT MSA	247	50.1%	1,610	19.5%	2.57	234
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,917	46.9%	21,974	18.5%	2.53	233
31 NE	30700 Lincoln, NE MSA	60	35.5%	1,165	14.1%	2.53	232
37 NC	39580 Raleigh-Cary, NC MSA	464	30.8%	3,603	12.2%	2.52	231
41 OR	21660 Eugene-Springfield, OR MSA	195	48.3%	2,067	19.3%	2.50	230
06 CA	42020 San Luis Obispo-Paso Robles, CA MSA	283	27.1%	929	10.8%	2.50	229
53 WA	34580 Mount Vernon-Anacortes, WA MSA	96	44.0%	700	17.9%	2.47	228
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	1,726	45.0%	14999	18.3%	2.46	227
42 PA	37964 Philadelphia, PA MD	1,340	33.4%	12,860	13.7%	2.44	226
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,494	36.7%	13,051	15.1%	2.43	225
25 MA	49340 Worcester, MA MSA	729	44.2%	5,126	18.5%	2.39	224
25 MA	44140 Springfield, MA MSA	765	47.4%	3,695	19.9%	2.38	223
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	1,008	40.4%	5,705	17.0%	2.38	222
08 CO	22660 Fort Collins-Loveland, CO MSA	155	33.6%	1,584	14.2%	2.36	221
37 NC	20500 Durham, NC MSA	125	24.4%	984	10.4%	2.34	220
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	1,203	41.4%	8,093	17.8%	2.33	219
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	2,123	48.4%	11645	20.8%	2.33	218
26 MI	26100 Holland-Grand Haven, MI MSA	143	37.8%	1,304	16.3%	2.32	217
06 CA	42220 Santa Rosa-Petaluma, CA MSA	1,099	28.1%	2,246	12.2%	2.30	216
06 CA	42100 Santa Cruz-Watsonville, CA MSA	418	24.9%	891	10.9%	2.28	215
12 FL	34940 Naples-Marco Island, FL MSA	1,424	47.4%	2,929	21.3%	2.23	214
08 CO	19740 Denver-Aurora, CO MSA	5,836	41.9%	18,690	19.0%	2.20	213
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	1,932	43.7%	6639	19.9%	2.19	212
45 SC	16700 Charleston-North Charleston, SC MSA	168	35.2%	3,125	16.1%	2.19	211
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	1,015	44.3%	6,161	20.4%	2.18	210
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	8,871	34.0%	13,455	15.8%	2.16	209
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	3,122	33.4%	6,489	15.5%	2.15	208
		11077	34.0%	22,259	15.8%	2.15	207
49 UT	41620 Salt Lake City, UT MSA	1,560	45.5%	8,369	21.2%	2.14	206
34 NJ	45940 Trenton-Ewing, NJ MSA	334	32.8%	1,308	15.4%	2.12	205
49 UT	39340 Provo-Orem, UT MSA	368	40.3%	3,004	19.0%	2.12	204
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	4,467	28.6%	5,900	13.6%	2.10	203
02 AK	11260 Anchorage, AK MSA	123	29.9%	1,631	14.2%	2.10	202
09 CT	35300 New Haven-Milford, CT MSA	1,075	43.5%	5,133	20.9%	2.10	202
41 OR	13460 Bend, OR MSA	63	31.8%	1,241	15.4%	2.07	200
33 NH	31700 Manchester-Nashua, NH MSA	145	34.3%	2,569	16.7%	2.07	199
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42 PA	25420 Harrisburg-Carlisle, PA MSA	80	32.1%	2,285	15.8%	2.03	198
04 AZ	39140 Prescott, AZ MSA	205	37.5%	1,631	18.4%	2.03	197
NJ+PA NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA 35084 Newark-Union, NJ-PA MD	873 3,828	35.4% 37.2%	4650 9,618	17.4% 18.4%	2.03 2.03	196 195

Table 4 - NCRC Analysis: Hispanic/White

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
06 CA	36084 Oakland-Fremont-Hayward, CA MD	7,460	31.2%	11,825	15.5%	2.01	194
55 WI	39540 Racine, WI MSA	188	37.8%	1,419	18.9%	2.00	193
49 UT	36260 Ogden-Clearfield, UT MSA	448	38.2%	3,641	19.2%	1.99	192
48 TX	31180 Lubbock, TX MSA	447	46.8%	1,176	23.5%	1.99	191
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	22,608	49.7%	57,200	25.0%	1.99	190
16 ID	14260 Boise City-Nampa, ID MSA	400	33.8%	4,255	17.1%	1.98	189
41 OR	41420 Salem, OR MSA	529	44.4%	2,499	22.4%	1.98	188
01 AL	13820 Birmingham-Hoover, AL MSA	223	44.3%	6,041	22.4%	1.98	187
04 AZ	46060 Tucson, AZ MSA	3,628	40.2%	7,989	20.4%	1.97	186
49 UT	41100 St. George, UT MSA	126	40.3%	1,364	20.4%	1.97	185
28 MS	27140 Jackson, MS MSA	54	40.9%	1,786	20.9%	1.96	184
ID+UT	30860 Logan, UT-ID MSA	50	30.3%	446	15.5%	1.96	183
36 NY	35004 Nassau-Suffolk, NY MD	5,031	44.1%	14,839	22.5%	1.96	182
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	8,130	28.8%	14,152	14.7%	1.96	181
48 TX	12420 Austin-Round Rock, TX MSA	1,884	30.7%	5,503	15.7%	1.96	180
26 MI	28020 Kalamazoo-Portage, MI MSA	83	43.5%	2,012	22.2%	1.96	179
08 CO	17820 Colorado Springs, CO MSA	659	34.8%	4,375	17.8%	1.95	178
18 IN	26900 Indianapolis, IN MSA	543	37.3%	10,104	19.3%	1.94	177
24 MD	12580 Baltimore-Towson, MD MSA	1,238	34.9%	15,843	18.1%	1.93	176
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	3,054	29.2%	4,509	15.2%	1.93	175
12 FL	39460 Punta Gorda, FL MSA	166	45.6%	1,552	23.7%	1.92	174
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	11,175	35.7%	22,891	18.6%	1.92	173
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	5,776	37.1%	16,490	19.6%	1.89	172
55 WI	31540 Madison, WI MSA	113	23.7%	2,420	12.5%	1.89	171
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	3,241	32.7%	21,755	17.3%	1.89	170
13 GA	12020 Athens-Clarke County, GA MSA	59	37.6%	784	19.9%	1.89	169
06 CA	34900 Napa, CA MSA	273	22.9%	544	12.2%	1.88	168
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	818	30.4%	7,413	16.2%	1.87	167
42 PA	39740 Reading, PA MSA	336	33.1%	2,009	17.8%	1.86	166
42 PA	42540 ScrantonWilkes-Barre, PA MSA	248	41.5%	2,821	22.3%	1.86	165
42 PA	49620 York-Hanover, PA MSA	88	33.6%	2,621	18.2%	1.85	164
48 TX	19124 Dallas-Plano-Irving, TX MD	7,304	42.8%	19.361	23.1%	1.85	163
34 NJ	20764 Edison, NJ MD	2,039	30.3%	11,741	16.4%	1.84	162
32 NV	39900 Reno-Sparks, NV MSA	843	32.5%	3,396	17.7%	1.84	161
08 CO	24300 Grand Junction, CO MSA	128	34.2%	1,117	18.6%	1.84	160
36 NY	28740 Kingston, NY MSA	80	37.6%	844	20.5%	1.84	159
VA+WV	49020 Winchester, VA-WV MSA	179	44.3%	1430	24.2%	1.83	158
36 NY	40380 Rochester, NY MSA	153	30.7%	3,185	16.8%	1.83	157
12 FL	15980 Cape Coral-Fort Myers, FL MSA	3,535	55.9%	9,228	30.6%	1.83	156
17 IL	16974 Chicago-Naperville-Joliet, IL MD	23,049	41.2%	58,143	22.6%	1.82	155
37 NC	24660 Greensboro-High Point, NC MSA	227	32.5%	2,672	17.9%	1.81	154
35 NM	42140 Santa Fe, NM MSA	388	26.7%	707	14.7%	1.81	153
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	1,315	28.3%	1,798	15.6%	1.81	152
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	3,701	38.6%	11,120	21.4%	1.81	151
15 HI	26180 Honolulu, HI MSA	218	25.1%	1,019	13.9%	1.80	150
34 NJ	12100 Atlantic City, NJ MSA	556	41.5%	2,110	23.0%	1.80	149
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	369	33.3%	1,213	18.5%	1.80	148
56 WY	16940 Cheyenne, WY MSA	84	34.4%			1.78	147

Table 4 - NCRC Analysis: Hispanic/White

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
35 NM	22140 Farmington, NM MSA	115	44.2%	536	24.8%	1.78	146
39 OH	18140 Columbus, OH MSA	266	33.0%	9,207	18.5%	1.78	145
51 VA	40060 Richmond, VA MSA	356	28.3%	5,533	15.9%	1.78	144
17 IL	28100 Kankakee-Bradley, IL MSA	56	37.8%	598	21.5%	1.76	143
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	91	40.4%	1,130	23.0%	1.76	142
18 IN	23060 Fort Wayne, IN MSA	128	36.7%	2,415	20.9%	1.76	141
08 CO	24540 Greeley, CO MSA	621	39.4%	2,255	22.4%	1.76	140
48 TX	17780 College Station-Bryan, TX MSA	134	39.8%	651	22.6%	1.76	139
01 AL	26620 Huntsville, AL MSA	62	29.7%	1,638	16.9%	1.76	138
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	389	36.1%	4858	20.6%	1.75	137
37 NC	11700 Asheville, NC MSA	78	32.4%	2,136	18.6%	1.74	136
48 TX	47380 Waco, TX MSA	256	47.1%	1,026	27.2%	1.74	135
42 PA	29540 Lancaster, PA MSA	129	25.3%	1,880	14.6%	1.73	134
55 WI	27500 Janesville, WI MSA	77	41.6%	1,354	24.0%	1.73	133
39 OH	45780 Toledo, OH MSA	159	38.4%	3,723	22.2%	1.73	132
53 WA	45104 Tacoma, WA MD	527	40.8%	7,268	23.7%	1.72	131
06 CA	17020 Chico, CA MSA	198	31.9%	1,223	18.6%	1.72	130
12 FL	46940 Vero Beach, FL MSA	157	37.1%	1,110	21.6%	1.72	129
16 ID	26820 Idaho Falls, ID MSA	56	31.8%	763	18.6%	1.71	128
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	302	38.1%	5,017	22.3%	1.71	127
34 NJ	15804 Camden, NJ MD	740	32.6%	7,687	19.1%	1.71	126
48 TX	47020 Victoria, TX MSA	177	41.8%	385	24.5%	1.71	125
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	376	32.2%	4,191	18.9%	1.71	124
41 OR	32780 Medford, OR MSA	111	32.5%	1,462	19.0%	1.71	123
55 WI	24580 Green Bay, WI MSA	63	26.9%	1,818	15.9%	1.69	122
45 SC	43900 Spartanburg, SC MSA	64	39.3%	1,276	23.2%	1.69	121
19 IA	19780 Des Moines, IA MSA	215	35.2%	4,155	20.9%	1.69	120
45 SC	17900 Columbia, SC MSA	125	32.3%	2,681	19.1%	1.69	119
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	75	45.7%	3636	27.1%	1.69	118
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	826	47.3%	11,260	28.1%	1.68	117
26 MI	24340 Grand Rapids-Wyoming, MI MSA	544	39.5%	5,772	23.5%	1.68	116
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	50	40.0%	2,018	23.8%	1.68	115
IL+MO	41180 St. Louis, MO-IL MSA	454	33.8%	18,592	20.2%	1.68	114
39 OH	10420 Akron, OH MSA	56	35.2%	4,109	21.1%	1.67	113
29 MO	44180 Springfield, MO MSA	57	35.4%	2,996	21.3%	1.67	112
32 NV	29820 Las Vegas-Paradise, NV MSA	10,343	47.0%	23,991	28.3%	1.66	111
37 NC	49180 Winston-Salem, NC MSA	132	25.8%	1,708	15.6%	1.66	110
48 TX	46340 Tyler, TX MSA	102	31.9%	746	19.3%	1.65	109
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,250	44.2%	4,804	26.8%	1.65	108
40 OK	36420 Oklahoma City, OK MSA	645	39.3%	7,077	23.9%	1.65	107
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	417	30.9%	17,230	18.8%	1.64	106
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	6,181	43.4%	28,368	26.5%	1.64	105
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	472	25.5%	7,697	15.6%	1.64	104
47 TN	28940 Knoxville, TN MSA	99	38.8%	4,940	23.8%	1.63	103
04 AZ	22380 Flagstaff, AZ MSA	50	22.3%	458	13.7%	1.63	102
36 NY 48 TX	15380 Buffalo-Niagara Falls, NY MSA 41660 San Angelo, TX MSA	73 157	26.6% 41.4%	2,973 432	16.4% 25.6%	1.62 1.62	101 100

Table 4 - NCRC Analysis: Hispanic/White

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
48 TX	33260 Midland, TX MSA	261	44.8%	750	27.7%	1.62	98
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	628	34.7%	3,451	21.5%	1.62	97
06 CA	46700 Vallejo-Fairfield, CA MSA	1,481	33.6%	3,036	20.8%	1.61	96
53 WA	49420 Yakima, WA MSA	503	36.0%	1,045	22.4%	1.61	95
36 NY	10580 Albany-Schenectady-Troy, NY MSA	96	28.3%	3,706	17.6%	1.61	94
06 CA	39820 Redding, CA MSA	88	32.8%	1,367	20.5%	1.60	93
33 NH	40484 Rockingham County-Strafford County, NH MD	58	27.9%	3,004	17.4%	1.60	92
12 FL	45220 Tallahassee, FL MSA	72	26.4%	1,335	16.5%	1.59	91
26 MI	29620 Lansing-East Lansing, MI MSA	195	40.0%	3,572	25.1%	1.59	90
48 TX	10180 Abilene, TX MSA	108	45.2%	732	28.5%	1.58	89
17 IL	40420 Rockford, IL MSA	449	42.7%	2,822	27.0%	1.58	88
18 IN	21140 Elkhart-Goshen, IN MSA	182	39.0%	1,358	24.6%	1.58	87
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	15,261	46.5%	30,038	29.5%	1.58	86
48 TX	30980 Longview, TX MSA	105	45.7%	926	29.0%	1.58	85
12 FL	36740 Orlando-Kissimmee, FL MSA	9,543	41.3%	21,561	26.3%	1.57	84
12 FL	23540 Gainesville, FL MSA	89	25.8%	946	16.5%	1.57	83
48 TX	23104 Fort Worth-Arlington, TX MD	2,848	38.0%	10,694	24.3%	1.56	82
45 SC	24860 Greenville, SC MSA	151	29.9%	2,562	19.2%	1.56	81
12 FL	27260 Jacksonville, FL MSA	883	33.8%	9,289	21.7%	1.55	80
22 LA	43340 Shreveport-Bossier City, LA MSA	50	35.0%	1,573	22.5%	1.55	79
48 TX	48660 Wichita Falls, TX MSA	67	37.9%	662	24.5%	1.55	78
35 NM	29740 Las Cruces, NM MSA	686	37.8%	941	24.4%	1.55	77
06 CA	49700 Yuba City, CA MSA	618	41.6%	1,644	27.0%	1.54	76
18 IN	23844 Gary, IN MD	783	35.8%	4,340	23.2%	1.54	75
13 GA	42340 Savannah, GA MSA	51	23.5%	1,216	15.5%	1.52	74
53 WA	44060 Spokane, WA MSA	62	27.8%	2,909	18.3%	1.52	73
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	238	27.4%	3,798	18.1%	1.51	72
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	377	27.1%	9,524	17.9%	1.51	71
KS+MO	28140 Kansas City, MO-KS MSA	872	33.2%	15,136	22.0%	1.51	70
48 TX	41700 San Antonio, TX MSA	6,384	37.7%	9,801	25.0%	1.51	69
22 LA	12940 Baton Rouge, LA MSA	94	34.3%	3,264	22.8%	1.50	68
10 DE	20100 Dover, DE MSA	50	30.3%	936	20.2%	1.50	67
48 TX	18580 Corpus Christi, TX MSA	1,341	43.5%	2,162	29.1%	1.49	66
06 CA	41500 Salinas, CA MSA	2,082	28.8%	2,265	19.4%	1.49	65
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	475	33.0%	5,125	22.2%	1.49	64
12 FL	36100 Ocala, FL MSA	384	38.4%	2,534	25.8%	1.48	63
32 NV	16180 Carson City, NV MSA	66	25.7%	355	17.4%	1.48	62
06 CA	23420 Fresno, CA MSA	5,548	43.0%	7,946	29.2%	1.47	61
12 FL	29460 Lakeland, FL MSA	1,685	48.0%	5,887	32.6%	1.47	60
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	43,454	34.7%	53,882	23.6%	1.47	59
35 NM	10740 Albuquerque, NM MSA	2,574	27.7%	4,984	18.9%	1.47	58
05 AR	30780 Little Rock-North Little Rock, AR MSA	72	26.2%	2,635	17.9%	1.46	57
53 WA	36500 Olympia, WA MSA	64	25.0%	1,566	17.2%	1.46	56
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	105	30.4%	2375	20.9%	1.45	55
20 KS	45820 Topeka, KS MSA	70	31.7%	1,399	22.0%	1.44	54
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	134	33.3%	2038	23.1%	1.44	53
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	896	40.1%	5,833	28.1%	1.43	52
20 KS	48620 Wichita, KS MSA	296	31.0%	3,322	21.7%	1.42	51

Table 4 - NCRC Analysis: Hispanic/White

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
08 CO	39380 Pueblo, CO MSA	751	44.5%	1,645	31.3%	1.42	50
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	9,031	38.0%	17,931	26.9%	1.41	49
48 TX	13140 Beaumont-Port Arthur, TX MSA	85	34.0%	1,163	24.2%	1.41	48
06 CA	31460 Madera, CA MSA	1,143	42.4%	1,547	30.2%	1.40	47
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	259	39.3%	941	28.0%	1.40	46
06 CA	25260 Hanford-Corcoran, CA MSA	673	42.2%	1,126	30.4%	1.39	45
06 CA	12540 Bakersfield, CA MSA	6,743	44.6%	10,124	32.4%	1.38	44
IA+NE+SD	43580 Sioux City, IA-NE-SD MSA	92	35.7%	866	25.9%	1.38	43
06 CA	44700 Stockton, CA MSA	4,934	39.7%	7,569	29.0%	1.37	42
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	36,881	41.0%	54,024	30.2%	1.36	41
53 WA	14740 Bremerton-Silverdale, WA MSA	50	23.8%	1,601	17.7%	1.35	40
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	106	28.3%	2,702	21.1%	1.34	39
GA+TN	16860 Chattanooga, TN-GA MSA	78	39.8%	3954	29.7%	1.34	38
48 TX	11100 Amarillo, TX MSA	189	27.8%	1,038	20.8%	1.33	37
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	169	25.5%	12,056	19.1%	1.33	36
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	404	28.1%	9,424	21.1%	1.33	35
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	54	21.7%	1,113	16.3%	1.33	34
06 CA	33700 Modesto, CA MSA	4,081	37.2%	6,804	27.9%	1.33	33
13 GA	23580 Gainesville, GA MSA	237	28.7%	1,081	21.8%	1.32	32
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	130	34.0%	2731	25.9%	1.31	31
48 TX	36220 Odessa, TX MSA	358	58.4%	774	45.7%	1.28	30
06 CA	47300 Visalia-Porterville, CA MSA	2,777	41.0%	4,028	32.2%	1.27	29
00 CA 04 AZ	49740 Yuma, AZ MSA	856	27.2%	1,279	21.4%	1.27	28
IN+KY	31140 Louisville, KY-IN MSA	152	25.6%	7,043	20.2%	1.27	27
26 MI	22420 Flint, MI MSA	57	32.6%	3,333	25.9%	1.26	26
72 PR	· ·	157	9.9%	3,333 87	8.0%	1.24	25 25
	21940 Fajardo, PR MSA						25 24
06 CA 37 NC	32900 Merced, CA MSA	2,480 99	39.0%	3,103	32.4%	1.20	23
	22180 Fayetteville, NC MSA		17.7%	870	15.0%	1.18	23
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	62	27.7%	1,846	23.5%	1.18	22
40 OK	46140 Tulsa, OK MSA	286	32.0%	5,616	27.7%	1.16	21
48 TX	21340 El Paso, TX MSA	3,745	36.5%	4,156	31.9%	1.14	20
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	210	18.3%	1,136	16.1%	1.14	19
48 TX	15180 Brownsville-Harlingen, TX MSA	2,041	51.2%	2,202	45.2%	1.13	18
42 PA	38300 Pittsburgh, PA MSA	90	23.9%	10,778	21.1%	1.13	17
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	27,420	41.3%	30,362	36.7%	1.13	16
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	50	18.9%	1,587	16.9%	1.12	15
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	4,021	7.6%	2,658	6.9%	1.10	14
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	4,263	53.1%	4,422	49.2%	1.08	13
72 PR	38660 Ponce, PR MSA	304	9.5%	221	8.9%	1.07	12
72 PR	41900 San German-Cabo Rojo, PR MSA	207	11.5%	173	11.0%	1.05	11
06 CA	20940 El Centro, CA MSA	1,766	40.4%	1,665	38.7%	1.04	10
48 TX	29700 Laredo, TX MSA	1,452	43.4%	1,467	41.6%	1.04	9
72 PR	10380 Aguadilla-Isabela-San Sebastian, PR MSA	390	12.6%	319	12.3%	1.02	8
72 PR	32420 Mayaguez, PR MSA	125	10.5%	107	10.4%	1.01	7
72 PR	49500 Yauco, PR MSA	119	13.0%	98	12.9%	1.00	6
72 PR	25020 Guayama, PR MSA	140	9.0%	90	9.0%	1.00	5
KY+TN	17300 Clarksville, TN-KY MSA	50	15.2%	1196	18.9%	0.81	4
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	252	13.6%	2883	18.9%	0.72	3

Table 4 - NCRC Analysis: Hispanic/White

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
AR+OK	22900 Fort Smith, AR-OK MSA	59	21.4%	1857	32.2%	0.66	2
13 GA	19140 Dalton, GA MSA	154	15.8%	843	28.1%	0.56	1

Table 5 - NCRC Analysis: LMI Hispanic/LMI White

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
25 MA	15764 Cambridge-Newton-Framingham, MA MD	287	34.7%	1,622	13.2%	2.63	167
08 CO	14500 Boulder, CO MSA	144	37.4%	442	14.3%	2.62	166
25 MA	21604 Essex County, MA MD	441	40.5%	1,204	17.0%	2.39	165
49 UT	39340 Provo-Orem, UT MSA	194	48.4%	912	21.3%	2.27	164
41 OR	21660 Eugene-Springfield, OR MSA	77	48.1%	650	22.9%	2.11	163
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	852	49.1%	5488	23.6%	2.08	162
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,321	49.6%	11,334	23.9%	2.08	161
37 NC	39580 Raleigh-Cary, NC MSA	328	36.8%	1,711	18.1%	2.04	160
08 CO	22660 Fort Collins-Loveland, CO MSA	86	36.9%	673	18.3%	2.01	159
45 SC	16700 Charleston-North Charleston, SC MSA	84	47.7%	1,075	23.9%	2.00	158
09 CT	35980 Norwich-New London, CT MSA	124	50.2%	688	25.2%	1.99	157
53 WA	42644 Seattle-Bellevue-Everett, WA MD	658	41.4%	4,371	20.8%	1.99	156
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	633	44.2%	2,862	22.5%	1.97	155
25 MA	44140 Springfield, MA MSA	431	48.3%	1,554	24.7%	1.95	154
26 MI	26100 Holland-Grand Haven, MI MSA	109	38.7%	743	19.9%	1.94	153
25 MA	14484 Boston-Quincy, MA MD	207	25.6%	1,713	13.6%	1.88	152
04 AZ	39140 Prescott, AZ MSA	54	38.6%	330		1.86	151
49 UT	41620 Salt Lake City, UT MSA	1,040	51.9%	3,712	28.1%	1.85	150
25 MA	49340 Worcester, MA MSA	241	38.6%	1,713	21.1%	1.83	149
37 NC	20500 Durham, NC MSA	86	29.7%	413	16.4%	1.81	148
06 CA	25260 Hanford-Corcoran, CA MSA	141	42.9%	656	23.7%	1.81	140
42 PA	37964 Philadelphia, PA MD	827	37.7%	5,087	20.9%	1.81	147
42 PA 42 PA	25420 Harrisburg-Carlisle, PA MSA	50	37.7%	1,091	20.6%	1.80	140
08 CO	· ·	3,815	47.9%	8,509	27.0%	1.77	143
49 UT	19740 Denver-Aurora, CO MSA	3,613	42.4%		24.1%	1.76	144
49 0 1 09 CT	36260 Ogden-Clearfield, UT MSA	563		1,800			143
55 WI	14860 Bridgeport-Stamford-Norwalk, CT MSA	850	37.8%	1,424	21.6%	1.75	142
	33340 Milwaukee-Waukesha-West Allis, WI MSA		43.2%	3,618	25.0%	1.73	
09 CT	35300 New Haven-Milford, CT MSA	551	44.8%	2,141	26.3%	1.70	140
26 MI	28020 Kalamazoo-Portage, MI MSA	66	53.7%	1,065	31.7%	1.69	139
41 OR	41420 Salem, OR MSA	275	45.7%	914	27.0%	1.69	138
12 FL	34940 Naples-Marco Island, FL MSA	193	36.7%	478	22.0%	1.67	137
08 CO	17820 Colorado Springs, CO MSA	335	38.4%	1,714	23.1%	1.66	136
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	1,376	46.9%	3369		1.64	135
55 WI	39540 Racine, WI MSA	150	42.7%	729	26.1%	1.64	134
16 ID	14260 Boise City-Nampa, ID MSA	226	36.5%	1,741	22.5%	1.62	133
18 IN	26900 Indianapolis, IN MSA	408	42.8%	5,263	26.5%	1.62	132
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,328	33.1%	2,902	20.5%	1.62	131
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	496	38.8%	1996	24.1%	1.61	130
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	477	34.8%	3068	21.7%	1.60	129
36 NY	35004 Nassau-Suffolk, NY MD	739	33.6%	2,874	21.0%	1.60	128
04 AZ	46060 Tucson, AZ MSA	1,265	44.7%	2,251	28.0%	1.59	127
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	253	40.8%	1,542	25.8%	1.58	126
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	10,227	54.9%	18,259	34.9%	1.57	125
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	480	20.8%	765	13.3%	1.57	124
53 WA	45104 Tacoma, WA MD	178	46.8%	1,858	29.9%	1.57	123
39 OH	18140 Columbus, OH MSA	181	39.9%	4,561	25.9%	1.54	122
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	472	20.0%	892	13.0%	1.54	121

Table 5 - NCRC Analysis: LMI Hispanic/LMI White

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
NJ+PA	35084 Newark-Union, NJ-PA MD	730	34.5%	2,257	22.5%	1.54	120
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	826	22.0%	1,294	14.4%	1.53	119
34 NJ	20764 Edison, NJ MD	596	28.5%	3,743	18.6%	1.53	118
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	879	31.9%	2,397	20.9%	1.52	117
34 NJ	45940 Trenton-Ewing, NJ MSA	188	33.3%	574	21.9%	1.52	116
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	3100	31.9%	7,314	21.0%	1.52	115
18 IN	23060 Fort Wayne, IN MSA	96	42.1%	1,481	27.9%	1.51	114
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	57	47.5%	562	31.4%	1.51	113
48 TX	12420 Austin-Round Rock, TX MSA	1,164	36.5%	2,547	24.2%	1.51	112
48 TX	10180 Abilene, TX MSA	52	59.8%	243	39.6%	1.51	111
47 TN	28940 Knoxville, TN MSA	66	51.6%	2,419	34.2%	1.51	110
45 SC	17900 Columbia, SC MSA	73	38.4%	1,199	25.5%	1.51	109
36 NY	40380 Rochester, NY MSA	104	32.2%	1,666	21.4%	1.51	108
42 PA	29540 Lancaster, PA MSA	80	26.5%	764	17.6%	1.50	107
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	342	22.8%	487	15.3%	1.49	106
55 WI	27500 Janesville, WI MSA	61	44.5%	701	30.0%	1.48	105
01 AL	13820 Birmingham-Hoover, AL MSA	119	49.6%	2,608	33.5%	1.48	104
06 CA	36084 Oakland-Fremont-Hayward, CA MD	607	21.0%	1,154	14.3%	1.47	103
17 IL	16974 Chicago-Naperville-Joliet, IL MD	8,574	40.8%	17,406	27.8%	1.47	102
08 CO	24540 Greeley, CO MSA	292	41.5%	720	28.3%	1.47	101
42 PA	39740 Reading, PA MSA	209	31.8%	854	21.8%	1.46	100
12 FL	15980 Cape Coral-Fort Myers, FL MSA	467	45.7%	1,491	31.5%	1.45	99
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	1,989	35.8%	10,470	24.8%	1.44	98
34 NJ	12100 Atlantic City, NJ MSA	212	42.5%	656	29.5%	1.44	97
34 NJ	15804 Camden, NJ MD	391	35.4%	3,109	24.6%	1.44	96
48 TX	17780 College Station-Bryan, TX MSA	58	47.5%	176	33.1%	1.44	95
32 NV	29820 Las Vegas-Paradise, NV MSA	3,086	50.6%	5,434	35.4%	1.43	94 93
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	924 148	37.3%	2,579	26.0%	1.43	93 92
36 NY 53 WA	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	242	32.7% 34.8%	858 548	22.9% 24.5%	1.42 1.42	92 91
26 MI	28420 Kennewick-Richland-Pasco, WA MSA	234					90
32 NV	47644 Warren-Farmington Hills-Troy, MI MD	285	34.9% 31.7%	9,581 915	24.8% 22.6%	1.41 1.40	90 89
35 NM	39900 Reno-Sparks, NV MSA 42140 Santa Fe, NM MSA	116	26.7%	180		1.40	88
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	50	47.6%	1779	34.1%	1.40	87
17 IL	40420 Rockford, IL MSA	278	45.5%	1,379	32.6%	1.39	86
42 PA	42540 ScrantonWilkes-Barre, PA MSA	144	40.3%	1,379	29.0%	1.39	85
39 OH	45780 Toledo, OH MSA	90	40.0%	1,737	28.8%	1.39	84
48 TX	47020 Victoria, TX MSA	76	45.5%	123	32.8%	1.39	83
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	444	52.2%	4,182	37.7%	1.39	82
18 IN	23844 Gary, IN MD	465	42.1%	1,980	30.4%	1.38	81
40 OK	36420 Oklahoma City, OK MSA	393	42.1% 42.9%	3,032	31.3%	1.37	80
IL+MO	41180 St. Louis, MO-IL MSA	289	37.7%	9,581	27.6%	1.37	79
37 NC	24660 Greensboro-High Point, NC MSA	141	36.6%	1,250	26.9%	1.36	79 78
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	198	29.8%	2,624	22.0%	1.36	76 77
51 VA	40060 Richmond, VA MSA	179	29.4%	2,458	21.8%	1.35	77 76
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	1,764	44.2%	7,753	33.2%	1.33	76 75
26 MI	24340 Grand Rapids-Wyoming, MI MSA	409	40.7%	3,202	30.6%	1.33	75 74
12 FL	36740 Orlando-Kissimmee, FL MSA	2,764				1.33	74

Table 5 - NCRC Analysis: LMI Hispanic/LMI White

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
06 CA	46700 Vallejo-Fairfield, CA MSA	121	23.6%		17.9%	1.32	72
MS+TN+AR	32820 Memphis, TN-MS-AR MSA	168		1,824	34.1%	1.32	71
48 TX	19124 Dallas-Plano-Irving, TX MD	4,574		-,	35.8%	1.32	70
24 MD	12580 Baltimore-Towson, MD MSA	412		6,372	25.3%	1.30	69
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	286		2547	28.7%	1.30	68
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	351	18.2%	963	14.0%	1.30	67
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	167	30.2%		23.3%	1.30	66
26 MI	29620 Lansing-East Lansing, MI MSA	121	41.0%	1,928	31.7%	1.29	65
53 WA	49420 Yakima, WA MSA	234		345	29.0%	1.29	64
48 TX	46340 Tyler, TX MSA	65		250		1.29	63
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	436		3,309	23.6%	1.29	62
55 WI	31540 Madison, WI MSA	57		1,114	16.3%	1.28	61
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	93		5,962	26.1%	1.27	60
48 TX	41660 San Angelo, TX MSA	78		174	36.3%	1.27	59
48 TX	47380 Waco, TX MSA	146			42.0%	1.27	58
35 NM	29740 Las Cruces, NM MSA	212		243	37.9%	1.27	57
48 TX	33260 Midland, TX MSA	131	52.2%	281	41.3%	1.26	56
18 IN	21140 Elkhart-Goshen, IN MSA	129		729	31.2%	1.26	55
35 NM	10740 Albuquerque, NM MSA	1,018		1,628	22.3%	1.26	54
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	247	29.8%	4,370	23.8%	1.25	53
37 NC	49180 Winston-Salem, NC MSA	87	27.4%	787	21.9%	1.25	52
42 PA	38300 Pittsburgh, PA MSA	54			30.2%	1.24	51
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	129		1,271	27.0%	1.23	50
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	1,487	38.2%	3,288	31.0%	1.23	49
48 TX	23104 Fort Worth-Arlington, TX MD	1,817	42.6%	4,653	34.6%	1.23	48
08 CO	39380 Pueblo, CO MSA	331	48.0%	634	39.2%	1.22	47
19 IA	19780 Des Moines, IA MSA	161	35.1%	2,483	28.8%	1.22	46
KS+MO	28140 Kansas City, MO-KS MSA	585			29.9%	1.22	45
12 FL	27260 Jacksonville, FL MSA	339		3,456	31.1%	1.22	44
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	151	34.0%	1,732	28.3%	1.20	43
48 TX	18580 Corpus Christi, TX MSA	465		627	45.3%	1.20	42
48 TX	41700 San Antonio, TX MSA	2,965		3,762	40.3%	1.20	41
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	139		814	28.0%	1.19	40
06 CA	31460 Madera, CA MSA	169		186	31.2%	1.19	39
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	257	39.7%	1,561	33.5%	1.18	38
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	111	39.1%		33.1%	1.18	37
06 CA	41500 Salinas, CA MSA	94		110		1.18	36
12 FL	36100 Ocala, FL MSA	90		662	31.3%	1.17	35
06 CA	23420 Fresno, CA MSA	1,120		1,312	37.0%	1.17	34
12 FL	29460 Lakeland, FL MSA	401	43.5%	1,566	37.3%	1.17	33
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	100			33.7%	1.16	32
48 TX	36220 Odessa, TX MSA	118		200	55.9%	1.16	31
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	8,105		,	43.6%	1.16	30
48 TX	11100 Amarillo, TX MSA	105		386	29.4%	1.15	29
06 CA	33700 Modesto, CA MSA	330			24.4%	1.15	28
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	573			19.7%	1.15	27
20 KS	48620 Wichita, KS MSA	217	32.3%		28.3%	1.14	26
48 TX	30980 Longview, TX MSA	53	47.3%	308	41.5%	1.14	25

Table 5 - NCRC Analysis: LMI Hispanic/LMI White

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
IA+NE+SD	43580 Sioux City, IA-NE-SD MSA	67	38.5%	470	33.7%	1.14	24
45 SC	24860 Greenville, SC MSA	86	32.0%	1,236	28.0%	1.14	23
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	129	25.2%	214	22.3%	1.13	22
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	3,934	33.9%	5,915	30.1%	1.13	21
06 CA	12540 Bakersfield, CA MSA	1,267	41.8%	1,641	37.3%	1.12	20
06 CA	44700 Stockton, CA MSA	385	30.4%	655	27.5%	1.11	19
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	96	34.0%	1127	30.9%	1.10	18
04 AZ	49740 Yuma, AZ MSA	173	24.6%	210	22.8%	1.08	17
48 TX	15180 Brownsville-Harlingen, TX MSA	422	59.2%	412	56.6%	1.05	16
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	2,194	22.5%	2,808	21.5%	1.04	15
48 TX	29700 Laredo, TX MSA	199	55.7%	195	54.0%	1.03	14
48 TX	21340 El Paso, TX MSA	982	43.8%	999	42.5%	1.03	13
13 GA	23580 Gainesville, GA MSA	146	29.0%	469	28.5%	1.02	12
06 CA	47300 Visalia-Porterville, CA MSA	536	38.1%	668	37.7%	1.01	11
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	1,854	35.6%	2,081	35.4%	1.01	10
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	593	66.6%	588	66.3%	1.00	9
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	241	29.9%	4,638	30.2%	0.99	8
06 CA	32900 Merced, CA MSA	138	28.3%	174	28.7%	0.98	7
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	66	19.9%	299	20.9%	0.95	6
IN+KY	31140 Louisville, KY-IN MSA	79	25.7%	3454	27.4%	0.94	5
40 OK	46140 Tulsa, OK MSA	163	31.8%	2,422	35.2%	0.90	4
06 CA	20940 El Centro, CA MSA	155	39.8%	153	45.4%	0.88	3
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	111	11.3%	980	23.7%	0.48	2
13 GA	19140 Dalton, GA MSA	80	11.7%	414	29.7%	0.39	1

Table 6 - NCRC Analysis: MUI Hispanic/MUI White

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
25 MA	15764 Cambridge-Newton-Framingham, MA MD	722	49.7%	3,256	11.9%	4.17	178
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,372	25.7%	2,351	7.5%	3.43	177
25 MA	21604 Essex County, MA MD	1,060	56.2%	2,959	16.7%	3.37	176
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	782	39.2%	2,420	12.8%	3.07	175
25 MA	14484 Boston-Quincy, MA MD	1,137	44.8%	5,689	14.7%	3.05	174
09 CT	35980 Norwich-New London, CT MSA	120	52.6%	897	17.4%	3.02	173
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,610	38.1%	3,313	13.5%	2.83	172
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	581	44.4%	10,385	15.8%	2.81	171
25 MA	49340 Worcester, MA MSA	469	49.5%	3,317	17.9%	2.76	170
25 MA	12700 Barnstable Town, MA MSA	121	50.4%	1,229	18.3%	2.76	169
25 MA	44140 Springfield, MA MSA	313	48.1%	2,048	17.6%	2.74	168
53 WA	34580 Mount Vernon-Anacortes, WA MSA	60	45.5%	487	16.8%	2.70	167
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	523	43.0%	3,141	15.9%	2.70	166
34 NJ	45940 Trenton-Ewing, NJ MSA	141	35.6%	700	13.2%	2.69	165
55 WI	31540 Madison, WI MSA	54	28.4%	1,269	10.6%	2.67	164
06 CA	42020 San Luis Obispo-Paso Robles, CA MSA	252	29.1%	808	10.9%	2.66	163
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	1,586	56.5%	8,328	21.3%	2.66	162
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	7165	38.2%	13,830	14.4%	2.65	161
41 OR	21660 Eugene-Springfield, OR MSA	114	50.7%	1,381	19.2%	2.65	160
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	333	39.4%	4,347	14.9%	2.64	159
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	356	36.9%	2,729	14.3%	2.58	158
08 CO	22660 Fort Collins-Loveland, CO MSA	69	33.2%	880	12.9%	2.57	157
53 WA	42644 Seattle-Bellevue-Everett, WA MD	831	35.5%	8,532	13.9%	2.56	156
42 PA	37964 Philadelphia, PA MD	474	29.4%	7,412	11.5%	2.55	155
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	885	43.1%	9,322	17.0%	2.53	154
02 AK	11260 Anchorage, AK MSA	74	35.9%	1,013	14.3%	2.52	153
33 NH	31700 Manchester-Nashua, NH MSA	104	41.3%	1,659	16.5%	2.50	152
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	315	32.3%	3,820	13.4%	2.41	151
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	718	47.4%	4,333	19.9%	2.38	150
24 MD	12580 Baltimore-Towson, MD MSA	758	37.3%	9,060	15.7%	2.38	149
08 CO	19740 Denver-Aurora, CO MSA	1,988	39.6%	9,959	16.7%	2.37	148
37 NC	39580 Raleigh-Cary, NC MSA	1,966	23.3%	1,755	9.8%	2.37	147
12 FL	3 37	1,173	52.2%	2,318	22.2%	2.35	147
49 UT	34940 Naples-Marco Island, FL MSA	509	44.7%	4,570		2.33	145
49 01 09 CT	41620 Salt Lake City, UT MSA	509			19.2%		-
	35300 New Haven-Milford, CT MSA	_	44.6%	2,906	19.2%	2.32	144
06 CA	42220 Santa Rosa-Petaluma, CA MSA	1,043	30.4%	2,027	13.2%	2.31	143
06 CA	42100 Santa Cruz-Watsonville, CA MSA	384	27.3%	829	11.8%	2.30	142
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	7,930	37.9%	11,975	16.6%	2.28	141
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	1,187	32.1%	10,853	14.1%	2.28	140
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	98	37.5%	2,239	16.8%	2.24	139
48 TX	12420 Austin-Round Rock, TX MSA	685	28.4%	2,799	12.7%	2.23	138
51 VA	40060 Richmond, VA MSA	162	30.3%	2,953	13.7%	2.21	137
NJ+PA	35084 Newark-Union, NJ-PA MD	3,018	40.3%	7,103	18.3%	2.20	136
42 PA	42540 ScrantonWilkes-Barre, PA MSA	84	42.2%	1,486	19.2%	2.20	135
NJ+PA 01 AL	10901 Allentown-Bethlehem-Easton, PA-NJ MSA 13820 Birmingham-Hoover, AL MSA	344 100	32.7% 41.0%	2,504 3,353	14.9% 18.7%	2.20 2.20	134 133

Table 6 - NCRC Analysis: MUI Hispanic/MUI White

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
16 ID	14260 Boise City-Nampa, ID MSA	158	33.5%	2,406	15.2%	2.20	132
41 OR	41420 Salem, OR MSA	248	47.1%	1,555	21.5%	2.19	131
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	3,950	30.9%	5,096	14.3%	2.16	130
26 MI	24340 Grand Rapids-Wyoming, MI MSA	126	41.2%	2,505	19.1%	2.16	129
49 UT	36260 Ogden-Clearfield, UT MSA	128	37.2%	1,798	17.2%	2.16	128
VA+WV	49020 Winchester, VA-WV MSA	152	47.2%	935	21.9%	2.16	127
42 PA	39740 Reading, PA MSA	95	34.9%	1,090	16.2%	2.15	126
48 TX	19124 Dallas-Plano-Irving, TX MD	2,622	41.2%	10,624	19.3%	2.14	125
53 WA	48300 Wenatchee, WA MSA	55	36.4%	360	17.0%	2.14	124
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	11,942	48.7%	37,192	23.0%	2.12	123
45 SC	16700 Charleston-North Charleston, SC MSA	74	29.1%	1,931	13.9%	2.10	122
04 AZ	46060 Tucson, AZ MSA	2,321	40.4%	5,592	19.2%	2.10	121
08 CO	17820 Colorado Springs, CO MSA	316	35.6%	2,596	17.0%	2.10	120
04 AZ	39140 Prescott, AZ MSA	146	38.9%	1,225	18.6%	2.09	119
49 UT	39340 Provo-Orem, UT MSA	171	40.6%	2,050	19.5%	2.09	118
48 TX	31180 Lubbock, TX MSA	254	45.5%	794	21.8%	2.08	117
49 UT	41100 St. George, UT MSA	104	43.9%	1,125	21.2%	2.07	116
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	123	33.6%	653	16.2%	2.07	115
06 CA	36084 Oakland-Fremont-Hayward, CA MD	6,771	33.8%	10,568	16.4%	2.06	114
36 NY	35004 Nassau-Suffolk, NY MD	4,137	49.1%	11,503	23.9%	2.06	113
12 FL	39460 Punta Gorda, FL MSA	121	49.8%	1,130	24.2%	2.05	112
34 NJ	20764 Edison, NJ MD	1,386	33.8%	7,545	16.5%	2.05	111
08 CO	24300 Grand Junction, CO MSA	83	39.5%	768	19.4%	2.04	110
32 NV	39900 Reno-Sparks, NV MSA	537	34.4%	2,404	17.0%	2.02	109
34 NJ	12100 Atlantic City, NJ MSA	329	44.1%	1,375	21.9%	2.02	108
12 FL	46940 Vero Beach, FL MSA	114	42.4%	746	21.1%	2.01	107
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	2,686	31.7%	3,976	15.8%	2.01	107
17 IL	16974 Chicago-Naperville-Joliet, IL MD	14,120	44.3%	39,614	22.1%	2.00	105
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	7,580	30.8%	13,099	15.4%	2.00	103
39 OH	45780 Toledo, OH MSA	65	37.6%	1,910	18.9%	1.99	104
NJ+NY	, and the second	10,506	38.8%	21,168	19.6%		103
18 IN	35644 New York-White Plains-Wayne, NY-NJ MD	10,506	31.2%	4,654	15.8%	1.98	102
06 CA	26900 Indianapolis, IN MSA 40900 SacramentoArden-ArcadeRoseville, CA MSA	4,834	39.6%	13,880	20.1%	1.97 1.96	101
37 NC	24660 Greensboro-High Point, NC MSA	78	28.7%	1,353	14.6%	1.96	99
08 CO	<u> </u>	327					
06 CO 22 LA	24540 Greeley, CO MSA	242	43.1%	1,516	22.2%	1.94	98 97
35 NM	35380 New Orleans-Metairie-Kenner, LA MSA	268	33.3% 27.7%	2,817 519	17.2% 14.4%	1.94 1.93	96
	42140 Santa Fe, NM MSA						96 95
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	2,581	40.6%	7,971	21.1%	1.92	
06 CA	34900 Napa, CA MSA	257	24.3%	482	12.7%	1.92	94
26 MI	29620 Lansing-East Lansing, MI MSA	73	39.9%	1,587	20.8%	1.91	93
12 FL	15980 Cape Coral-Fort Myers, FL MSA	2,904	60.9%	7,300	31.8%	1.91	92 91
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	1,175	30.0%	1,572	15.8%	1.89	
12 FL	23540 Gainesville, FL MSA	55	25.3%	543	13.5%	1.88	90
36 NY	28740 Kingston, NY MSA	55	38.7%	623	20.6%	1.88	89
06 CA	17020 Chico, CA MSA	151	34.7%	979	18.5%	1.87	88
15 HI	26180 Honolulu, HI MSA	183	27.6%	879	14.8%	1.87	87
IL+MO 48 TX	41180 St. Louis, MO-IL MSA 47380 Waco, TX MSA	158 110	30.4% 43.8%	8,749 643	16.4% 23.7%	1.86 1.85	86 85

Table 6 - NCRC Analysis: MUI Hispanic/MUI White

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
34 NJ	15804 Camden, NJ MD	334	31.9%	4,389	17.2%	1.85	84
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	171	27.3%			1.83	83
48 TX	47020 Victoria, TX MSA	99	42.1%	259	23.4%	1.80	82
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	372	45.4%	6,880	25.3%	1.80	81
48 TX	41660 San Angelo, TX MSA	77	40.3%	249	22.5%	1.79	80
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	6,885	44.7%	17,275	25.0%	1.78	79
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	4,166	44.9%	19,589	25.4%	1.76	78
41 OR	32780 Medford, OR MSA	87	34.9%	1,156	19.8%	1.76	77
45 SC	24860 Greenville, SC MSA	50	26.2%	1,247	14.8%	1.76	76
39 OH	18140 Columbus, OH MSA	81	26.9%	4,511	15.3%	1.76	75
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,018	48.3%	3,682	27.5%	1.76	74
48 TX	33260 Midland, TX MSA	129	41.6%	454	23.7%	1.75	73
12 FL	27260 Jacksonville, FL MSA	507	33.5%	5,539	19.1%	1.75	72
53 WA	45104 Tacoma, WA MD	341	40.0%	5,362	22.9%	1.74	71
48 TX	17780 College Station-Bryan, TX MSA	73	36.5%	465	21.0%	1.74	70
13 GA	23580 Gainesville, GA MSA	81	33.5%	592	19.3%	1.73	69
53 WA	49420 Yakima, WA MSA	258		677	20.7%	1.72	68
35 NM	22140 Farmington, NM MSA	81	42.2%	438	24.6%	1.72	67
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	129		3,114	19.9%	1.71	66
32 NV	29820 Las Vegas-Paradise, NV MSA	7,104		18,140		1.71	65
17 IL	40420 Rockford, IL MSA	163		1,397	24.3%	1.70	64
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	256			14.0%	1.70	63
40 OK	36420 Oklahoma City, OK MSA	234			20.7%	1.69	62
12 FL	36740 Orlando-Kissimmee, FL MSA	6,220		14,784	25.5%	1.68	61
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	468		2,516	21.7%	1.67	60
48 TX	23104 Fort Worth-Arlington, TX MD	985		5,856	21.2%	1.67	59
06 CA	39820 Redding, CA MSA	77	35.3%	1,158	21.2%	1.67	58
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	305		3,193	20.7%	1.66	57
06 CA	46700 Vallejo-Fairfield, CA MSA	1,337	36.3%	2,674	22.0%	1.65	56
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	83		1668	20.8%	1.63	55
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	148		4,612	17.2%	1.62	54
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	69		1,833	15.5%	1.62	53
48 TX	41700 San Antonio, TX MSA	3,308			21.6%	1.61	52
12 FL	36100 Ocala, FL MSA	265		1,764	24.8%	1.61	51
12 FL	29460 Lakeland, FL MSA	1,177			32.1%	1.60	50
35 NM	29740 Las Cruces, NM MSA	465		687	22.4%	1.60	49
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	120		4,948	15.3%	1.60	48
IN+KY	31140 Louisville, KY-IN MSA	71	26.9%	3,509	16.8%	1.60	47
35 NM	10740 Albuquerque, NM MSA	1,515		3,257	18.5%	1.59	46
KS+MO	28140 Kansas City, MO-KS MSA	264		7,021	18.2%	1.59	45
06 CA	49700 Yuba City, CA MSA	568		1,490	28.4%	1.57	45
06 CA 48 TX	18580 Corpus Christi, TX MSA	868		1,504	26.4% 26.9%	1.57	44
18 IN		304		2,276	20.9%		43
20 KS	23844 Gary, IN MD	71	28.2%		18.3%	1.55	42
20 KS 12 FL	48620 Wichita, KS MSA	592		1,583		1.54	41
	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA			4,036	27.5%	1.54	
06 CA	23420 Fresno, CA MSA	4,363			28.9%	1.53	39 38
06 CA 34 NJ	31084 Los Angeles-Long Beach-Glendale, CA MD 47220 Vineland-Millville-Bridgeton, NJ MSA	40,734 137			24.7% 27.2%	1.51 1.50	38 37

Table 6 - NCRC Analysis: MUI Hispanic/MUI White

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
08 CO	39380 Pueblo, CO MSA	413	44.7%	986	29.9%	1.49	36
06 CA	41500 Salinas, CA MSA	1,957	30.5%	2,140	20.5%	1.49	35
48 TX	10180 Abilene, TX MSA	54	38.3%	468	25.8%	1.48	34
06 CA	12540 Bakersfield, CA MSA	5,377	47.3%	8,384	32.6%	1.45	33
06 CA	31460 Madera, CA MSA	966	45.2%	1,347	31.2%	1.45	32
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	7,271	39.2%	14,028	27.2%	1.44	31
40 OK	46140 Tulsa, OK MSA	120	35.0%	3,133	24.4%	1.43	30
06 CA	25260 Hanford-Corcoran, CA MSA	518	43.0%	933	30.1%	1.43	29
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	74	28.4%	1,883	20.1%	1.41	28
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	32,568	43.5%	47,573	31.2%	1.39	27
06 CA	44700 Stockton, CA MSA	4,515	41.9%	6,870	30.1%	1.39	26
06 CA	47300 Visalia-Porterville, CA MSA	2,188	43.5%	3,322	32.4%	1.34	25
06 CA	33700 Modesto, CA MSA	3,715	39.3%	6,165	29.3%	1.34	25 24
48 TX	11100 Amarillo, TX MSA	81	24.8%	630	18.6%	1.33	23
04 AZ	49740 Yuma, AZ MSA	654	28.3%	1,031	21.6%	1.32	22
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	72	20.2%	5,928	15.7%	1.29	21
48 TX	36220 Odessa, TX MSA	238	58.2%	563	45.3%	1.29	20
06 CA	32900 Merced, CA MSA	2,319	40.9%	2,905	33.7%	1.21	19
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	140	19.2%	818	15.9%	1.21	18
37 NC	22180 Fayetteville, NC MSA	59	17.2%	598	14.3%	1.20	17
48 TX	21340 El Paso, TX MSA	2,679	38.1%	3,069	32.2%	1.18	16
72 PR	21940 Fajardo, PR MSA	134				1.17	15
48 TX	15180 Brownsville-Harlingen, TX MSA	1,590			45.0%	1.14	14
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	24,863	43.5%	27,500	38.3%	1.14	13
72 PR	38660 Ponce, PR MSA	263	9.1%		8.2%	1.10	12
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	3,399	7.0%	2,262	6.4%	1.10	11
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	3,602	52.4%	3,769	48.3%	1.08	10
72 PR	41900 San German-Cabo Rojo, PR MSA	167				1.06	9
06 CA	20940 El Centro, CA MSA	1,592	41.9%	1,500	39.6%	1.06	8
48 TX	29700 Laredo, TX MSA	1,227			42.6%	1.05	7
72 PR	10380 Aquadilla-Isabela-San Sebastian, PR MSA	363				1.02	6
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	126				1.01	5
72 PR	25020 Guayama, PR MSA	113				1.01	4
72 PR	49500 Yauco, PR MSA	109				1.00	3
72 PR	32420 Mayaquez, PR MSA	100				1.00	2
13 GA	19140 Dalton, GA MSA	72				0.96	1

Table 7 - NCRC Analysis: Asian/White

State	MSA	# High-Cost Loans to Asians	% High-Cost Loans to Asians	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
06 CA	34900 Napa, CA MSA	82	20.6%	544	12.2%	1.69	105
27 MN	40340 Rochester, MN MSA	53	24.9%	941	15.5%	1.61	104
02 AK	11260 Anchorage, AK MSA	152	22.7%	1,631	14.2%	1.59	103
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,498	27.7%	21,974	18.5%	1.50	102
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,206	10.3%	2,558	7.1%	1.46	101
06 CA	46700 Vallejo-Fairfield, CA MSA	1,041	27.8%	3,036	20.8%	1.34	100
32 NV	39900 Reno-Sparks, NV MSA	218	22.5%	3,396	17.7%	1.27	99
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	237	21.8%	8,093	17.8%	1.23	98
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	366	18.7%	7,697	15.6%	1.20	97
53 WA	45104 Tacoma, WA MD	491	27.8%	7,268	23.7%	1.18	96
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	197	23.7%	11645	20.8%	1.14	95
15 HI	26180 Honolulu, HI MSA	1,715	15.6%	1,019	13.9%	1.12	94
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	69	17.3%	1,798	15.6%	1.11	93
34 NJ	12100 Atlantic City, NJ MSA	224	25.5%	2,110	23.0%	1.11	92
06 CA	42220 Santa Rosa-Petaluma, CA MSA	74	13.3%	2,246	12.2%	1.09	91
06 CA	41500 Salinas, CA MSA	162	20.4%	2,265	19.4%	1.05	90
25 MA	44140 Springfield, MA MSA	61	21.0%	3,695	19.9%	1.05	89
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,798	15.6%	13,051	15.1%	1.03	88
08 CO	17820 Colorado Springs, CO MSA	88	18.0%	4,375	17.8%	1.01	87
06 CA	47300 Visalia-Porterville, CA MSA	150	32.3%	4,028	32.2%	1.00	86
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	2,193	19.4%	16,490	19.6%	0.99	85
53 WA	14740 Bremerton-Silverdale, WA MSA	56	17.3%	1,601	17.7%	0.98	84
08 CO	19740 Denver-Aurora, CO MSA	525	18.5%	18,690	19.0%	0.97	83
25 MA	21604 Essex County, MA MD	89	15.8%	4,273	16.4%	0.97	82
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,432	13.8%	14,152	14.7%	0.94	81
53 WA	36500 Olympia, WA MSA	65	16.0%	1,566	17.2%	0.93	80
12 FL	27260 Jacksonville, FL MSA	315	20.1%	9,289	21.7%	0.92	79
06 CA	23420 Fresno, CA MSA	793	26.8%	7,946	29.2%	0.92	78
32 NV	29820 Las Vegas-Paradise, NV MSA	2,575	25.8%	23,991	28.3%	0.91	77
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	132	13.2%	3,949	14.5%	0.91	76
24 MD	12580 Baltimore-Towson, MD MSA	725	16.4%	15,843	18.1%	0.91	75
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	77	24.2%	4,804	26.8%	0.90	74
26 MI	24340 Grand Rapids-Wyoming, MI MSA	71	21.0%	5,772	23.5%	0.89	73
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	74	18.0%	6,161	20.4%	0.89	72
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	506	23.6%	17,931	26.9%	0.88	71
37 NC	24660 Greensboro-High Point, NC MSA	65	15.7%	2,672	17.9%	0.88	70
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	170	18.2%	9,424	21.1%	0.86	69
06 CA	33700 Modesto, CA MSA	411	24.1%	6,804	27.9%	0.86	68
19 IA	19780 Des Moines, IA MSA	67	18.0%	4,155	20.9%	0.86	67
12 FL	15980 Cape Coral-Fort Myers, FL MSA	95	25.7%	9,228	30.6%	0.84	66
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	172	13.6%	7,413	16.2%	0.84	65
12 FL	29460 Lakeland, FL MSA	101	27.3%	5,887	32.6%	0.84	64
06 CA	12540 Bakersfield, CA MSA	336	26.9%	10,124	32.4%	0.83	63
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	71	18.4%	5,125	22.2%	0.83	62
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	87	15.6%	4,191	18.9%	0.83	61
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	99	18.4%	5,017	22.3%	0.83	60
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	1,646	20.5%	57,200	25.0%	0.82	59
KS+MO	28140 Kansas City, MO-KS MSA	188		15,136		0.80	58

Table 7 - NCRC Analysis: Asian/White

State	MSA	# High-Cost Loans to Asians	% High-Cost Loans to Asians	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	2,492	12.6%	22,259	15.8%	0.80	57
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	1,670	12.5%	13,455	15.8%	0.79	56
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	232	16.9%	11,120	21.4%	0.79	55
25 MA	14484 Boston-Quincy, MA MD	256	11.1%	7,625	14.1%	0.79	54
06 CA	49700 Yuba City, CA MSA	186	21.3%	1,644	27.0%	0.79	53
06 CA	36084 Oakland-Fremont-Hayward, CA MD	2,735	12.2%	11,825	15.5%	0.78	52
17 IL	16974 Chicago-Naperville-Joliet, IL MD	3,161	17.7%	58,143	22.6%	0.78	51
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	3,043	14.5%	22,891	18.6%	0.78	50
06 CA	44700 Stockton, CA MSA	1,390	22.6%	7,569	29.0%	0.78	49
42 PA	37964 Philadelphia, PA MD	712	10.6%	12,860	13.7%	0.77	48
IL+MO	41180 St. Louis, MO-IL MSA	233	15.5%	18,592	20.2%	0.77	47
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	3,226	23.1%	54,024	30.2%	0.76	46
36 NY	35004 Nassau-Suffolk, NY MD	570	17.1%	14,839	22.5%	0.76	45
49 UT	41620 Salt Lake City, UT MSA	137	16.0%	8,369	21.2%	0.76	44
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	6,339	17.8%	53,882	23.6%	0.76	43
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	285	15.0%	6639	19.9%	0.75	42
51 VA	40060 Richmond, VA MSA	153	12.0%	5,533	15.9%	0.75	41
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	699	11.7%	6,489	15.5%	0.75	40
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	600	19.8%	28,368	26.5%	0.75	39
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	182	11.3%	4,509	15.2%	0.75	38
35 NM	10740 Albuquerque, NM MSA	81	13.9%	4,984	18.9%	0.74	37
12 FL	36740 Orlando-Kissimmee, FL MSA	753	19.4%	21,561	26.3%	0.74	36
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	913	12.6%	21,755	17.3%	0.73	35
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	320	26.7%	30,362	36.7%	0.73	34
25 MA	15764 Cambridge-Newton-Framingham, MA MD	259	8.7%	5,036	12.1%	0.72	33
01 AL	13820 Birmingham-Hoover, AL MSA	53	16.2%	6,041	22.4%	0.72	32
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	115	12.2%	5,705	17.0%	0.72	31
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	584	13.1%	14999	18.3%	0.71	30
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	71	12.3%	4650	17.4%	0.70	29
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	51	19.4%	5,833	28.1%	0.69	28
NJ+PA	35084 Newark-Union, NJ-PA MD	340	12.6%	9,618	18.4%	0.68	27
25 MA	49340 Worcester, MA MSA	107	12.6%	5,126	18.5%	0.68	26
48 TX	23104 Fort Worth-Arlington, TX MD	258	16.3%	10,694	24.3%	0.67	25
34 NJ	15804 Camden, NJ MD	194	12.6%	7,687	19.1%	0.66	24
04 AZ	46060 Tucson, AZ MSA	102	13.2%	7,989	20.4%	0.65	23
18 IN	26900 Indianapolis, IN MSA	107	12.4%	10,104	19.3%	0.64	22
06 CA	32900 Merced, CA MSA	228	20.7%	3,103	32.4%	0.64	21
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	59	13.6%	3,451	21.5%	0.63	20
36 NY	10580 Albany-Schenectady-Troy, NY MSA	67	11.0%	3,706	17.6%	0.62	19
39 OH	18140 Columbus, OH MSA	147	11.4%	9,207	18.5%	0.62	18
20 KS	48620 Wichita, KS MSA	61	12.8%	3,322	21.7%	0.59	17
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	224	16.6%	11,260	28.1%	0.59	16
40 OK	36420 Oklahoma City, OK MSA	101	14.0%	7,077	23.9%	0.59	15
37 NC	39580 Raleigh-Cary, NC MSA	94	7.0%	3,603	12.2%	0.58	14
48 TX	41700 San Antonio, TX MSA	100	14.3%	9,801	25.0%	0.57	13
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	82	10.2%	9,524	17.9%	0.57	12
09 CT	35300 New Haven-Milford, CT MSA	77	11.9%	5,133	20.9%	0.57	11
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	1,510	7.6%	5,900	13.6%	0.55	10
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	289		17,230	18.8%	0.55	9

Table 7 - NCRC Analysis: Asian/White

State	MSA	# High-Cost Loans to Asians	% High-Cost Loans to Asians	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	1,250	16.0%	30,038	29.5%	0.54	8
48 TX	19124 Dallas-Plano-Irving, TX MD	607	12.6%	19,361	23.1%	0.54	7
34 NJ	20764 Edison, NJ MD	584	8.6%	11,741	16.4%	0.52	6
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	58	9.3%	3,798	18.1%	0.51	5
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	89	9.4%	12,056	19.1%	0.49	4
34 NJ	45940 Trenton-Ewing, NJ MSA	63	6.8%	1,308	15.4%	0.44	3
48 TX	12420 Austin-Round Rock, TX MSA	102	6.6%	5,503	15.7%	0.42	2
42 PA	38300 Pittsburgh, PA MSA	53	8.1%	10,778	21.1%	0.38	1

Table 8 - NCRC Analysis: LMI Asian/LMI White

State	MSA	# High-Cost Loans to LMI Asians	% High-Cost Loans to LMI Asian	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	126	33.3%	3,618	25.0%	1.34	47
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	700	30.7%	11,334	23.9%	1.28	46
02 AK	11260 Anchorage, AK MSA	52	18.8%	606	15.7%	1.20	45
15 HI	26180 Honolulu, HI MSA	277	11.8%	132	11.5%	1.03	44
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	96	37.2%	4,182	37.7%	0.99	43
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	59	6.1%	174	6.3%	0.98	42
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	93	20.9%	2,624	22.0%	0.95	41
06 CA	44700 Stockton, CA MSA	50	25.8%	655	27.5%	0.94	40
34 NJ	12100 Atlantic City, NJ MSA	58	27.2%	656	29.5%	0.92	39
32 NV	29820 Las Vegas-Paradise, NV MSA	324	29.8%	5,434	35.4%	0.84	38
KS+MO	28140 Kansas City, MO-KS MSA	90	25.2%	7296	29.9%	0.84	37
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	70	26.1%	3,288	31.0%	0.84	36
08 CO	19740 Denver-Aurora, CO MSA	196	22.6%	8,509	27.0%	0.84	35
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	75	19.7%	3,309	23.6%	0.83	34
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	138	17.1%	2,397	20.9%	0.82	33
51 VA	40060 Richmond, VA MSA	50	17.7%	2,458	21.8%	0.81	32
53 WA	45104 Tacoma, WA MD	79	24.2%	1,858	29.9%	0.81	31
12 FL	27260 Jacksonville, FL MSA	84	24.6%	3,456	31.1%	0.79	30
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	69	23.0%	4,638	30.2%	0.76	29 28
IL+MO	41180 St. Louis, MO-IL MSA	90	20.9%	9,581	27.6%	0.76	28
53 WA	42644 Seattle-Bellevue-Everett, WA MD	408	15.6%	4,371	20.8%	0.75	27
39 OH	18140 Columbus, OH MSA	67	18.9%	4,561	25.9%	0.73	26
42 PA	37964 Philadelphia, PA MD	321	15.1%	5,087	20.9%	0.72	25 24
24 MD	12580 Baltimore-Towson, MD MSA	129	17.7%	6,372	25.3%	0.70	24
34 NJ	15804 Camden, NJ MD	60	16.9%	3,109	24.6%	0.69	23
12 FL	36740 Orlando-Kissimmee, FL MSA	119	22.2%	5,710	32.7%	0.68	22
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	68	19.0%	3369	28.6%	0.66	21
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	447	13.9%	7,314	21.0%	0.66	20
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	87	19.9%	5,915	30.1%	0.66	19
25 MA	15764 Cambridge-Newton-Framingham, MA MD	66	8.7%	1,622	13.2%	0.65	18
49 UT	41620 Salt Lake City, UT MSA	54	18.1%	3,712	28.1%	0.64	17
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	229	13.2%	2,902	20.5%	0.64	16
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	82	21.2%	7,753	33.2%	0.64	15
17 IL	16974 Chicago-Naperville-Joliet, IL MD	539	17.3%	17,406	27.8%	0.62	14
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	107	15.3%	9,581	24.8%	0.62	13
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	223	21.3%	18,259	34.9%	0.61	12
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	135	8.0%	765	13.3%	0.60	11
48 TX	23104 Fort Worth-Arlington, TX MD	105	20.7%	4,653	34.6%	0.60	10
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	167	13.7%	5488	23.6%	0.58	9
06 CA	36084 Oakland-Fremont-Hayward, CA MD	110	7.9%	1,154	14.3%	0.56	8
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	333	13.2%	10,470	24.8%	0.53	7
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	61	7.5%	1,294	14.4%	0.52	6
48 TX	19124 Dallas-Plano-Irving, TX MD	190	17.4%	8,435	35.8%	0.49	5
34 NJ	20764 Edison, NJ MD	88	9.0%	3,743	18.6%	0.48	4
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	317	19.4%	12,266	43.6%	0.44	3
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	79	9.0%		21.5%	0.42	2

Table 8 - NCRC Analysis: LMI Asian/LMI White

State		# High-Cost Loans to LMI Asians	5	3	5	3	Rank
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	55	5.5%	963	14.0%	0.39	1

Table 9 - NCRC Analysis: MUI Asian/MUI White

State	MSA	# High-Cost Loans to MUI Asians	% High-Cost Loans to MUI Asians	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Asians	High-Cost Disparity Ratio	Rank
02 AK	11260 Anchorage, AK MSA	100		1,013	14.3%	1.87	91
MN+WI	33461 Minneapolis-St. Paul-Bloomington, MN-WI MSA	770		10,385		1.68	90
06 CA	34900 Napa, CA MSA	79	20.7%	482	12.7%	1.64	89
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,137	11.3%	2,351	7.5%	1.50	88
32 NV	39900 Reno-Sparks, NV MSA	163	23.2%	2,404	17.0%	1.37	87
06 CA	46700 Vallejo-Fairfield, CA MSA	990	29.2%	2,674	22.0%	1.33	86
NC+VA	47261 Virginia Beach-Norfolk-Newport News, VA-NC MSA	254	18.4%	4,877	14.0%	1.31	85
53 WA	45104 Tacoma, WA MD	404	29.2%	5,362	22.9%	1.27	84
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	158	26.2%	8,328	21.3%	1.23	83
34 NJ	12100 Atlantic City, NJ MSA	154	26.5%	1,375	21.9%	1.21	82
15 HI	26180 Honolulu, HI MSA	1,430	17.3%	879	14.8%	1.17	81
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,365	15.9%	8,532	13.9%	1.15	80
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	63	18.1%	1,572	15.8%	1.14	79
53 WA	36500 Olympia, WA MSA	53	18.2%	1,012	16.0%	1.14	78
06 CA	42220 Santa Rosa-Petaluma, CA MSA	68	14.1%	2,027	13.2%	1.07	77
08 CO	19740 Denver-Aurora, CO MSA	323	17.9%	9,959	16.7%	1.07	76
06 CA	41500 Salinas, CA MSA	157	21.5%	2,140		1.05	75
24 MD	12580 Baltimore-Towson, MD MSA	564	16.4%	9,060		1.05	74
06 CA	47300 Visalia-Porterville, CA MSA	132		3,322	32.4%	1.03	73
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	103		4,347	14.9%	1.03	72
25 MA	21604 Essex County, MA MD	68		2,959		1.03	71
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	2,015		13,880	20.1%	1.01	70
12 FL	27260 Jacksonville, FL MSA	211	19.2%	5,539		1.00	69
08 CO	17820 Colorado Springs, CO MSA	51	16.9%	2,596		0.99	68
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	91	12.6%	2,420		0.98	67
06 CA	23420 Fresno, CA MSA	735	27.9%	6,576		0.96	66
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	95	16.5%	4,612		0.96	65
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	61	18.7%	4,333		0.94	64
32 NV	29820 Las Vegas-Paradise, NV MSA	2.131	26.4%	18,140		0.94	63
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,364	14.3%	13,099		0.93	62
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	61	25.3%	3,682	27.5%	0.92	61
IL+WI	29405 Lake County-Kenosha County, IL-WI MD	206	14.4%	3,141	15.9%	0.92	60
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	50		3,193	20.7%	0.90	59
13 GA		544	12.6%	10,853		0.89	58
	12060 Atlanta-Sandy Springs-Marietta, GA MSA	415			27.2%	0.89	50 57
12 FL 12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	77	28.1%	14,028	32.1%	0.89	5 <i>7</i> 56
	29460 Lakeland, FL MSA			4,098			
12 FL	15980 Cape Coral-Fort Myers, FL MSA	83		7,300		0.87	55
DC+MD+VA+WV	47895 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	1899	12.5%	13,830	14.4%	0.87	54
25 MA	14484 Boston-Quincy, MA MD	212		5,689		0.85	53
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	56		2,817	17.2%	0.85	52
17 IL	16974 Chicago-Naperville-Joliet, IL MD	2,571	18.6%	39,614	22.1%	0.84	51
06 CA	33700 Modesto, CA MSA	396		6,165		0.84	50
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	436		3,313	13.5%	0.83	49
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	1,120		37,192		0.83	48
06 CA	12540 Bakersfield, CA MSA	305		8,384	32.6%	0.82	47
49 UT	41620 Salt Lake City, UT MSA	81	15.6%	4,570		0.81	46
IL+MO	41181 St. Louis, MO-IL MSA	131	13.3%	8,749	16.4%	0.81	45

Table 9 - NCRC Analysis: MUI Asian/MUI White

State	MSA	# High-Cost Loans to MUI Asians	% High-Cost Loans to MUI Asians	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Asians	High-Cost Disparity Ratio	Rank
06 CA	49700 Yuba City, CA MSA	178		,		0.80	44
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	1,579		11,975		0.79	43
35 NM	10740 Albuquerque, NM MSA	61	14.6%	3,257	18.5%	0.79	42
NC+SC	16741 Charlotte-Gastonia-Concord, NC-SC MSA	82		3,820		0.78	41
06 CA	36084 Oakland-Fremont-Hayward, CA MD	2,593		10,568	16.4%	0.78	40
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	65		2,729	14.3%	0.78	39
OR+WA	38901 Portland-Vancouver-Beaverton, OR-WA MSA	407	13.2%	9,322	17.0%	0.78	38
NJ+NY	35645 New York-White Plains-Wayne, NY-NJ MD	2,879		21,168	19.6%	0.77	37
06 CA	44700 Stockton, CA MSA	1,325		6,870	30.1%	0.77	36
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	462		19,589		0.77	35
12 FL	36740 Orlando-Kissimmee, FL MSA	553		14,784	25.5%	0.76	34
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	170		7,971	21.1%	0.76	33
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	3,077	23.8%	47,573	31.2%	0.76	32
KS+MO	28141 Kansas City, MO-KS MSA	90			18.2%	0.76	31
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	6,158		50,553	24.7%	0.76	30
51 VA	40060 Richmond, VA MSA	94			13.7%	0.75	29
AR+MS+TN	32821 Memphis, TN-MS-AR MSA	57	15.0%		19.9%	0.75	28
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	171	11.9%	3,976	15.8%	0.75	27
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	301	28.4%	27,500		0.74	26
36 NY	35004 Nassau-Suffolk, NY MD	502		11,503	23.9%	0.74	25
25 MA	15764 Cambridge-Newton-Framingham, MA MD	178			11.9%	0.72	24
42 PA	37964 Philadelphia, PA MD	345			11.5%	0.69	23
NJ+PA	35085 Newark-Union, NJ-PA MD	293		7,103	18.3%	0.69	22
48 TX	23104 Fort Worth-Arlington, TX MD	141	14.2%	5,856	21.2%	0.67	21
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	51	14.5%	2,516		0.67	20
48 TX	41700 San Antonio, TX MSA	78		5,841	21.6%	0.66	19
34 NJ	15804 Camden, NJ MD	124		4,389		0.65	18
06 CA	32900 Merced, CA MSA	221	21.7%	2,905	33.7%	0.64	17
25 MA	49340 Worcester, MA MSA	78		3,317	17.9%	0.64	16
04 AZ	46060 Tucson, AZ MSA	71	12.1%	5,592	19.2%	0.63	15
37 NC	39580 Raleigh-Cary, NC MSA	61	6.2%	1,755	9.8%	0.63	14
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	52		4,948	15.3%	0.62	13
40 OK	36420 Oklahoma City, OK MSA	58		3,922	20.7%	0.62	12
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	877	15.3%	17,275	25.0%	0.61	11
39 OH	18140 Columbus, OH MSA	79		4,511	15.3%	0.60	10
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	176		7,346	15.0%	0.59	9
48 TX	19124 Dallas-Plano-Irving, TX MD	398		10,624	19.3%	0.58	8
09 CT	35300 New Haven-Milford, CT MSA	53		2,906	19.2%	0.58	7
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	1,359		5,096	14.3%	0.54	6
34 NJ	20764 Edison, NJ MD	477	8.6%	· ·	16.5%	0.52	5
34 NJ	45940 Trenton-Ewing, NJ MSA	53		700		0.51	4
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	127				0.47	3
IN+KY+OH 48 TX	17141 Cincinnati-Middletown, OH-KY-IN MSA 12420 Austin-Round Rock, TX MSA	50 62			15.7% 12.7%	0.47 0.44	2

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	584	22.6%		7.2%	3.16	380
54 WV	34060 Morgantown, WV MSA	240	33.3%		14.4%	2.32	379
42 PA	37964 Philadelphia, PA MD	12,520	30.0%	12,697	14.7%	2.04	378
38 ND	13900 Bismarck, ND MSA	322	25.1%		12.5%	2.01	377
12 FL	23540 Gainesville, FL MSA	679	33.3%		16.7%	1.99	376
42 PA	44300 State College, PA MSA	224	21.0%		10.6%	1.99	375
51 VA	13980 Blacksburg-Christiansburg-Radford, VA MSA	362	26.0%		13.3%	1.96	374
37 NC	20500 Durham, NC MSA	1,244	28.2%		14.5%	1.94	373
37 NC	39580 Raleigh-Cary, NC MSA	3,607	25.8%	3,148	13.3%	1.94	372
08 CO	14500 Boulder, CO MSA	563	15.6%	581	8.1%	1.93	371
54 WV	16620 Charleston, WV MSA	703	34.9%	884	18.1%	1.93	370
17 IL	37900 Peoria, IL MSA	1,313	29.6%	995	15.3%	1.93	369
13 GA	15260 Brunswick, GA MSA	341	46.9%	522	24.3%	1.93	368
MN+WI	29100 La Crosse, WI-MN MSA	365	26.6%	325	13.9%	1.92	367
13 GA	46660 Valdosta, GA MSA	425	45.4%	523	23.7%	1.92	366
48 TX	12420 Austin-Round Rock, TX MSA	3,569	26.3%	3,805	13.8%	1.90	365
34 NJ	45940 Trenton-Ewing, NJ MSA	1,459	32.1%	1,364	16.9%	1.90	364
45 SC	24860 Greenville, SC MSA	1,918	33.2%	1,798	17.6%	1.89	363
01 AL	26620 Huntsville, AL MSA	1,523	31.9%	1,272	16.9%	1.89	362
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	7,411	35.6%	6,621	18.9%	1.89	361
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	2,837	28.1%	3,710	15.0%	1.87	360
51 VA	16820 Charlottesville, VA MSA	560	22.4%	551	12.1%	1.86	359
55 WI	20740 Eau Claire, WI MSA	622	29.1%	476	15.6%	1.86	358
28 MS	37700 Pascagoula, MS MSA	510	49.7%	668	26.8%	1.86	357
25 MA	38340 Pittsfield, MA MSA	287	21.1%	287	11.4%	1.85	356
26 MI	28020 Kalamazoo-Portage, MI MSA	1,436			19.2%	1.85	355
48 TX	41700 San Antonio, TX MSA	4,795	40.7%	7,595	22.0%	1.85	354
IN+KY	21780 Evansville, IN-KY MSA	1266	31.6%		17.1%	1.84	353
39 OH	10420 Akron, OH MSA	3,355	35.8%		19.4%	1.84	352
22 LA	29180 Lafayette, LA MSA	1,026	43.8%		23.8%	1.84	351
19 IA	16300 Cedar Rapids, IA MSA	1,026	25.5%		13.9%	1.83	350
47 TN	28940 Knoxville, TN MSA	3,062	37.1%		20.3%	1.83	349
19 IA	26980 Iowa City, IA MSA	277	15.5%		8.5%	1.83	348
28 MS	27140 Jackson, MS MSA	1,962	51.5%		28.3%	1.82	347
42 PA	11020 Altoona, PA MSA	421	37.7%		20.7%	1.82	346
IL+MO	41180 St. Louis, MO-IL MSA	17,724	36.7%		20.2%	1.82	345
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	7,018	32.0%		17.6%	1.81	344
01 AL	13820 Birmingham-Hoover, AL MSA	5,325	43.2%		23.9%	1.80	343
45 SC	16700 Charleston-North Charleston, SC MSA	2,358	33.9%	,	18.8%	1.80	342
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	4284	30.4%		16.9%	1.80	341
26 MI	11460 Ann Arbor, MI MSA	1,089			13.6%	1.80	340
37 NC	24140 Goldsboro, NC MSA	226	35.8%		19.9%	1.79	339
18 IN	23060 Fort Wayne, IN MSA	1,915			17.4%	1.79	338
21 KY	36980 Owensboro, KY MSA	334	29.5%		16.5%	1.79	337
17 IL	16580 Champaign-Urbana, IL MSA	495	22.5%	_	12.6%	1.79	336
45 SC	44940 Sumter, SC MSA	310				1.78	335

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
48 TX	33260 Midland, TX MSA	352	44.6%	534	25.1%	1.78	334
19 IA	47940 Waterloo-Cedar Falls, IA MSA	612	26.4%	425	14.9%	1.77	333
13 GA	31420 Macon, GA MSA	1,046	51.3%	1,001	29.0%	1.77	332
39 OH	19380 Dayton, OH MSA	3,545	34.1%	2,934	19.3%	1.77	331
21 KY	30460 Lexington-Fayette, KY MSA	1,460	28.3%	1,443	16.0%	1.77	330
OH+WV	37620 Parkersburg-Marietta-Vienna, WV-OH MSA	443	31.3%	423	17.7%	1.76	329
55 WI	48140 Wausau, WI MSA	415	24.2%	371	13.8%	1.76	328
19 IA	19780 Des Moines, IA MSA	3,021	30.6%	2,038	17.4%	1.76	327
47 TN	34980 Nashville-DavidsonMurfreesboro, TN MSA	7,259	35.0%	6,841	20.0%	1.75	326
MN+ND	24220 Grand Forks, ND-MN MSA	231	30.0%	220	17.2%	1.75	325
39 OH	18140 Columbus, OH MSA	7,121	30.9%	6,410	17.7%	1.75	324
45 SC	22500 Florence, SC MSA	665	49.9%	770	28.6%	1.75	323
45 SC	11340 Anderson, SC MSA	564	36.3%	578	20.8%	1.74	322
42 PA	38300 Pittsburgh, PA MSA	6,634	33.7%	7,583	19.4%	1.74	321
47 TN	27180 Jackson, TN MSA	620	48.9%	555	28.2%	1.73	320
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	6,927	55.5%	8,103	32.1%	1.73	319
AR+TX	45500 Texarkana, TX-Texarkana, AR MSA	312	49.5%	536	28.6%	1.73	318
48 TX	19124 Dallas-Plano-Irving, TX MD	13,539	39.6%	17,555	22.9%	1.73	317
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	3332	39.0%	2779	18.4%	1.73	316
01 AL	· · · · · · · · · · · · · · · · · · ·	1,225	31.7%		19.7%	1.73	315
	33860 Montgomery, AL MSA			1,261			
21 KY	14540 Bowling Green, KY MSA	320	33.9%	404	19.7%	1.72	314
20 KS	29940 Lawrence, KS MSA	205	19.0%	243	11.0%	1.72	313
18 IN	26900 Indianapolis, IN MSA	7,725	30.7%	6,286	17.9%	1.71	312
48 TX	47380 Waco, TX MSA	529	46.2%	882	27.0%	1.71	311
55 WI	39540 Racine, WI MSA	1,026	30.8%	906	18.1%	1.70	310
48 TX	13140 Beaumont-Port Arthur, TX MSA	667	42.6%	1,138	25.0%	1.70	309
26 MI	12980 Battle Creek, MI MSA	887	42.1%	661	24.7%	1.70	308
22 LA	12940 Baton Rouge, LA MSA	2,943	43.1%	3,336	25.3%	1.70	307
51 VA	40060 Richmond, VA MSA	6,653	33.4%	6,358	19.8%	1.69	306
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	1,412	31.9%	1,632	18.9%	1.69	305
48 TX	18580 Corpus Christi, TX MSA	733	46.2%	1,795	27.3%	1.69	304
KS+MO	28140 Kansas City, MO-KS MSA	11,744	36.0%	10,410	21.3%	1.69	303
48 TX	46340 Tyler, TX MSA	431	36.6%	748	21.7%	1.69	302
55 WI	11540 Appleton, WI MSA	734	20.5%	617	12.2%	1.68	301
48 TX	17780 College Station-Bryan, TX MSA	266	38.3%	591	22.8%	1.68	300
01 AL	12220 Auburn-Opelika, AL MSA	324	28.6%	438	17.1%	1.68	299
35 NM	29740 Las Cruces, NM MSA	292	38.4%	854	22.9%	1.68	298
48 TX	41660 San Angelo, TX MSA	219	39.5%	297	23.5%	1.68	297
37 NC	24660 Greensboro-High Point, NC MSA	2,472	34.6%	2,598	20.7%	1.68	296
22 LA	29340 Lake Charles, LA MSA	550	44.7%	796	26.7%	1.67	295
12 FL	27260 Jacksonville, FL MSA	6,562	38.5%	9,124	23.0%	1.67	294
AL+GA	17980 Columbus, GA-AL MSA	899	41.6%	1273	24.9%	1.67	293
41 OR	18700 Corvallis, OR MSA	105	15.6%	118	9.3%	1.67	292
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	8,794	31.3%	8,381	18.8%	1.67	291
28 MS	25060 Gulfport-Biloxi, MS MSA	487	39.2%	964	23.5%	1.67	290
12 FL	37460 Panama City-Lynn Haven, FL MSA	462	32.7%	980	19.7%	1.67	289
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	7,815	34.4%	11,242	20.7%	1.66	288
12 FL	7.200 Virginia Deadi-Nondik-Newport News, VA-NC MSA	1,013	32.8%	,		1.66	287

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
22 LA	43340 Shreveport-Bossier City, LA MSA	1,294	44.6%	1,839	26.9%	1.66	286
18 IN	34620 Muncie, IN MSA	472	38.8%	369	23.5%	1.65	285
26 MI	35660 Niles-Benton Harbor, MI MSA	704	38.4%	721	23.3%	1.65	284
51 VA	31340 Lynchburg, VA MSA	720	30.2%	783	18.3%	1.65	283
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	1484	34.0%	1146	20.6%	1.65	282
36 NY	27060 Ithaca, NY MSA	87	17.4%	100	10.6%	1.64	281
18 IN	18020 Columbus, IN MSA	245	24.7%	189	15.0%	1.64	280
48 TX	48660 Wichita Falls, TX MSA	308	36.8%	487	22.4%	1.64	279
IN+KY	31140 Louisville, KY-IN MSA	4,907	31.3%	4,715	19.1%	1.64	278
27 MN	40340 Rochester, MN MSA	688	21.8%	469	13.3%	1.64	277
55 WI	36780 Oshkosh-Neenah, WI MSA	633	25.2%	503	15.4%	1.64	276
TN+VA	28700 Kingsport-Bristol-Bristol, TN-VA MSA	948	35.7%	1168	21.8%	1.63	275
39 OH	30620 Lima, OH MSA	446		432	24.0%	1.63	274
36 NY	40380 Rochester, NY MSA	2,388		1,889	15.6%	1.63	273
24 MD	12580 Baltimore-Towson, MD MSA	15,102		18,595	21.2%	1.63	272
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	8,352		7,952	19.7%	1.63	271
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	1740		1381	21.6%	1.63	270
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	2929		3679	17.8%	1.62	269
22 LA	10780 Alexandria, LA MSA	418		745	32.1%	1.62	268
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	831	36.9%	805	22.7%	1.62	267
36 NY	13780 Binghamton, NY MSA	476		524	18.4%	1.62	266
37 NC	40580 Rocky Mount, NC MSA	418		550	28.5%	1.62	265
17 IL	44100 Springfield, IL MSA	593		507	14.2%	1.62	264
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	4.706		4,106	16.8%	1.62	263
18 IN	29140 Lafayette, IN MSA	4,700	23.7%	375	14.6%	1.62	262
IA+NE+SD	43580 Sioux City, IA-NE-SD MSA	537	35.1%	410	21.7%	1.62	261
29 MO	27620 Jefferson City, MO MSA	502		365	16.4%	1.61	260
08 CO	19740 Denver-Aurora, CO MSA	11,879		13,470	18.7%	1.61	259
26 MI		448		338	19.1%	1.61	259
26 MI 13 GA	13020 Bay City, MI MSA	469		729	31.3%	1.61	256 257
13 GA 22 LA	10500 Albany, GA MSA	3,192		5,440	23.7%	1.61	25 <i>7</i> 256
22 LA 48 TX	35380 New Orleans-Metairie-Kenner, LA MSA			,		1.61	255 255
	26420 Houston-Sugar Land-Baytown, TX MSA	19,476 606		29,458 834	29.4% 23.8%		255 254
47 TN 42 PA	27740 Johnson City, TN MSA	1,524				1.61 1.60	254 253
42 PA 40 OK	25420 Harrisburg-Carlisle, PA MSA	329		1,507 522	14.8%	1.60	
	30020 Lawton, OK MSA			_	24.0%		252
18 IN	14020 Bloomington, IN MSA	481	27.9%	503	17.4%	1.60	251
45 SC	17900 Columbia, SC MSA	2,949		2,865	22.9%	1.60	250
26 MI	24340 Grand Rapids-Wyoming, MI MSA	4,163		3,175	21.1%	1.60	249
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	29,052		27,070	22.0%	1.60	248
18 IN	45460 Terre Haute, IN MSA	681	38.5%	621	24.1%	1.60	247
48 TX	31180 Lubbock, TX MSA	492		984	23.6%	1.60	246
13 GA	42340 Savannah, GA MSA	972		1,573		1.60	245
48 TX	11100 Amarillo, TX MSA	495		776	19.6%	1.60	244
01 AL	46220 Tuscaloosa, AL MSA	507	31.8%	722	20.0%	1.59	243
36 NY	10580 Albany-Schenectady-Troy, NY MSA	2,328			17.8%	1.59	242
05 AR	30780 Little Rock-North Little Rock, AR MSA	1,905		2,397	20.0%	1.59	241
36 NY	45060 Syracuse, NY MSA	1,190		1,355	15.5%	1.59	240
45 SC	43900 Spartanburg, SC MSA	982	37.2%	954	23.4%	1.59	239

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
48 TX	23104 Fort Worth-Arlington, TX MD	6,808	37.7%	8,646	23.7%	1.59	238
GA+TN	16860 Chattanooga, TN-GA MSA	2472	43.5%	2709	27.4%	1.59	237
37 NC	24780 Greenville, NC MSA	320	29.0%	555	18.3%	1.59	236
18 IN	23844 Gary, IN MD	3,114	36.9%	3,162	23.3%	1.58	235
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	1,181	34.8%	1,153	21.9%	1.58	234
01 AL	33660 Mobile, AL MSA	1,370	43.7%	1,766	27.6%	1.58	233
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	12,817	27.4%	10,535	17.3%	1.58	232
37 NC	49180 Winston-Salem, NC MSA	1,456	29.0%	1,554	18.4%	1.58	231
19 IA	11180 Ames, IA MSA	174	20.7%	162	13.1%	1.58	230
26 MI	34740 Muskegon-Norton Shores, MI MSA	1,095	42.5%	823	27.0%	1.58	229
29 MO	17860 Columbia, MO MSA	371	20.0%	350	12.7%	1.58	228
01 AL	20020 Dothan, AL MSA	468	41.2%	608	26.1%	1.58	227
MN+WI	20260 Duluth, MN-WI MSA	1162	31.7%	1050	20.1%	1.58	226
22 LA	33740 Monroe, LA MSA	535	46.8%	748	29.8%	1.57	225
30 MT	33540 Missoula, MT MSA	180	20.2%	305	12.9%	1.57	224
28 MS	25620 Hattiesburg, MS MSA	340	47.0%	722	30.1%	1.56	223
39 OH	45780 Toledo, OH MSA	2,482	33.0%	2,537	21.1%	1.56	222
KY+OH+WV		2, 4 62 687	35.6% 35.6%	1075	22.8%	1.56	222
	26580 Huntington-Ashland, WV-KY-OH MSA						
51 VA	40220 Roanoke, VA MSA	1,210	30.9%	1,106	19.8%	1.56	220
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	3,563	29.5%	3,091	18.9%	1.56	219
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	24,550	30.5%	35,661	19.7%	1.55	218
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	13,040	54.9%	15,278	35.4%	1.55	217
OH+WV	48540 Wheeling, WV-OH MSA	333	32.5%	404	21.0%	1.55	216
13 GA	12020 Athens-Clarke County, GA MSA	517	33.5%	726	21.6%	1.55	215
26 MI	22420 Flint, MI MSA	2,424	40.2%	2,543	26.1%	1.54	214
34 NJ	36140 Ocean City, NJ MSA	295	28.8%	569	18.7%	1.54	213
17 IL	19500 Decatur, IL MSA	276	29.3%	303	19.1%	1.54	212
39 OH	15940 Canton-Massillon, OH MSA	1,922	38.3%	1,711	24.9%	1.53	211
37 NC	48900 Wilmington, NC MSA	839	24.7%	1,557	16.1%	1.53	210
01 AL	22520 Florence-Muscle Shoals, AL MSA	471	37.4%	525	24.4%	1.53	209
05 AR	27860 Jonesboro, AR MSA	329	39.9%	452	26.1%	1.53	208
47 TN	34100 Morristown, TN MSA	488	41.7%	705	27.2%	1.53	207
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	5,508	23.6%	6,053	15.5%	1.53	206
40 OK	36420 Oklahoma City, OK MSA	4,310	35.0%	5,302	22.9%	1.53	205
48 TX	30980 Longview, TX MSA	455	47.0%	863	30.7%	1.53	204
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	684	26.4%	800	17.3%	1.53	203
48 TX	10180 Abilene, TX MSA	290	40.6%	562	26.7%	1.52	202
OH+WV	48260 Weirton-Steubenville, WV-OH MSA	346	33.8%	388	22.2%	1.52	201
20 KS	48620 Wichita, KS MSA	2,269	31.3%	2,120	20.6%	1.52	200
55 WI	24580 Green Bay, WI MSA	992	21.8%	1,027	14.3%	1.52	199
42 PA	48700 Williamsport, PA MSA	292	30.4%	373	20.1%	1.52	198
16 ID	14260 Boise City-Nampa, ID MSA	2,481	27.3%	3,275	18.0%	1.52	197
01 AL	19460 Decatur, AL MSA	577	41.1%	617	27.1%	1.51	196
24 MD	41540 Salisbury, MD MSA	530	40.5%	769	26.7%	1.51	195
42 PA	21500 Erie, PA MSA	661	28.2%	712	18.6%	1.51	194
13 GA	25980 Hinesville-Fort Stewart, GA MSA	146	42.8%	355	28.3%	1.51	193
55 WI	27500 Janesville, WI MSA	867	32.9%	748	21.7%	1.51	193
	121 JUU JANGSVIIIC, VVI IVIJA	007	32.970	140	∠ 1.7 70	1.31	192

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
55 WI	43100 Sheboygan, WI MSA	382	25.7%	368	17.1%	1.51	190
18 IN	21140 Elkhart-Goshen, IN MSA	851	32.2%	693	21.4%	1.51	189
37 NC	22180 Fayetteville, NC MSA	731	33.1%	1,521	22.0%	1.50	188
42 PA	42540 ScrantonWilkes-Barre, PA MSA	1,618	31.9%	1,850	21.2%	1.50	187
17 IL	28100 Kankakee-Bradley, IL MSA	352	36.4%	535	24.3%	1.50	186
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	16,261	27.8%	14,630	18.5%	1.50	185
17 IL	14060 Bloomington-Normal, IL MSA	369	18.6%	372	12.4%	1.50	184
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	23,748	36.1%	49,649	24.1%	1.50	183
36 NY	24020 Glens Falls, NY MSA	405	36.6%	579	24.4%	1.50	182
39 OH	44220 Springfield, OH MSA	720	39.5%	594	26.4%	1.50	181
26 MI	29620 Lansing-East Lansing, MI MSA	2,511	34.7%	2,103	23.2%	1.50	180
36 NY	15380 Buffalo-Niagara Falls, NY MSA	1,890	25.3%	2,132	17.0%	1.49	179
13 GA	40660 Rome, GA MSA	240	31.1%	282	20.9%	1.49	178
26 MI	26100 Holland-Grand Haven, MI MSA	890	21.5%	636	14.5%	1.49	177
01 AL	23460 Gadsden, AL MSA	342	44.4%	468	29.9%	1.49	176
13 GA	23580 Gainesville, GA MSA	620	30.8%	756	20.8%	1.48	175
46 SD	43620 Sioux Falls, SD MSA	504	19.6%	550	13.3%	1.48	174
47 TN	17420 Cleveland, TN MSA	498	48.6%	631	32.9%	1.48	173
37 NC	11700 Asheville, NC MSA	950	27.5%	1,668	18.7%	1.47	172
49 UT	41620 Salt Lake City, UT MSA	4,652	30.2%	5,554	20.5%	1.47	172
18 IN		509	35.4%	429	24.0%	1.47	170
VA+WV	29020 Kokomo, IN MSA	543	33.6%	1157	22.9%	1.47	169
04 AZ	49020 Winchester, VA-WV MSA	2,953		7,303	20.3%	1.47	168
37 NC	46060 Tucson, AZ MSA	2,953	29.8% 33.7%	501	23.0%	1.47	167
	15500 Burlington, NC MSA						166
55 WI OH+PA	31540 Madison, WI MSA	1,288 2434	17.0% 39.0%	1,559 2434	11.6% 26.7%	1.46	165
-	49660 Youngstown-Warren-Boardman, OH-PA MSA	_				1.46	
31 NE	30700 Lincoln, NE MSA	727	19.0%	623	13.0%	1.46	164
48 TX	43300 Sherman-Denison, TX MSA	339	43.2%	564	29.7%	1.45	163
48 TX	47020 Victoria, TX MSA	177	35.0%	317	24.1%	1.45	162
20 KS	45820 Topeka, KS MSA	915		844	20.9%	1.45	161
05 AR	38220 Pine Bluff, AR MSA	187	44.2%	310	30.5%	1.45	160
39 OH	31900 Mansfield, OH MSA	472	33.9%	530	23.4%	1.45	159
26 MI	27100 Jackson, MI MSA	1,077	41.4%	953	28.6%	1.45	158
53 WA	42644 Seattle-Bellevue-Everett, WA MD	6,515	22.2%	13,539	15.3%	1.45	157
KS+MO	41140 St. Joseph, MO-KS MSA	639	43.6%	623	30.1%	1.45	156
40 OK	46140 Tulsa, OK MSA	3,297	37.8%	4,105	26.2%	1.44	155
ID+WA	30300 Lewiston, ID-WA MSA	109	21.4%	181	14.9%	1.44	154
53 WA	44060 Spokane, WA MSA	1,515		2,049	17.9%	1.44	153
36 NY	46540 Utica-Rome, NY MSA	567	28.9%	716	20.1%	1.44	152
39 OH	41780 Sandusky, OH MSA	237	28.8%	250	20.1%	1.43	151
49 UT	36260 Ogden-Clearfield, UT MSA	2,219	26.2%	2,133	18.3%	1.43	150
16 ID	26820 Idaho Falls, ID MSA	421	25.1%	466	17.5%	1.43	149
MN+ND	22020 Fargo, ND-MN MSA	454	18.9%	470	13.2%	1.43	148
53 WA	49420 Yakima, WA MSA	473	32.1%	859	22.5%	1.42	147
22 LA	26380 Houma-Bayou Cane-Thibodaux, LA MSA	535	40.8%	955	28.7%	1.42	146
33 NH	40484 Rockingham County-Strafford County, NH MD	1,348	24.2%	2,179	17.0%	1.42	145
KY+TN	17300 Clarksville, TN-KY MSA	688	28.9%	1091	20.4%	1.42	144
29 MO	44180 Springfield, MO MSA	1,579	28.9%	1,837	20.5%	1.41	143

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08 CO	22660 Fort Collins-Loveland, CO MSA	811	19.7%	1,074	13.9%	1.41	142
23 ME	12620 Bangor, ME MSA	494	36.6%	898	26.0%	1.41	141
25 MA	44140 Springfield, MA MSA	2,314	29.2%	2,905	20.7%	1.41	140
19 IA	20220 Dubuque, IA MSA	223	19.7%	213	14.0%	1.41	139
29 MO	27900 Joplin, MO MSA	796	38.7%	845	27.5%	1.41	138
41 OR	13460 Bend, OR MSA	432	21.4%	958	15.2%	1.41	137
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	1,257	33.0%	2,857	23.5%	1.41	136
13 GA	47580 Warner Robins, GA MSA	451	27.9%	527	19.8%	1.41	135
26 MI	33780 Monroe, MI MSA	637	29.4%	757	21.0%	1.40	134
09 CT	35980 Norwich-New London, CT MSA	958	27.4%	1,265	19.5%	1.40	133
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	2,505	31.3%	4,347	22.3%	1.40	132
34 NJ	15804 Camden, NJ MD	5,784	30.7%	7,913	22.0%	1.40	131
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	686	67.5%	4,347	48.5%	1.39	130
02 AK	21820 Fairbanks, AK MSA	168	24.5%	281	17.6%	1.39	129
08 CO	17820 Colorado Springs, CO MSA	2,308	25.6%	3,440	18.4%	1.39	128
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	531	24.2%	1,080	17.4%	1.39	127
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	7342	25.5%	12491	18.4%	1.39	126
51 VA	19260 Danville, VA MSA	320	38.3%	338	27.7%	1.38	125
55 WI	22540 Fond du Lac, WI MSA	380	25.7%	377	18.6%	1.38	124
09 CT	35300 New Haven-Milford, CT MSA	3,535	31.4%	4,514	22.8%	1.38	123
18 IN	33140 Michigan City-La Porte, IN MSA	493	35.8%	421	26.0%	1.38	122
50 VT	15540 Burlington-South Burlington, VT MSA	441	16.8%	587	12.2%	1.37	121
17 IL	16974 Chicago-Naperville-Joliet, IL MD	34,031	35.9%	62,515	26.2%	1.37	120
56 WY	16220 Casper, WY MSA	306	30.4%	368	22.2%	1.37	119
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	460	24.0%	1,327	17.6%	1.37	118
16 ID	38540 Pocatello, ID MSA	261	24.2%	306	17.7%	1.36	117
46 SD	39660 Rapid City, SD MSA	338	27.6%	563	20.3%	1.36	116
NJ+PA	35084 Newark-Union, NJ-PA MD	5,531	31.6%	13,420	23.2%	1.36	115
53 WA	14740 Bremerton-Silverdale, WA MSA	647	24.6%	1,517	18.1%	1.36	114
17 IL	40420 Rockford, IL MSA	1,757	35.4%	1,746	26.1%	1.36	113
36 NY	21300 Elmira, NY MSA	198	33.4%	243	24.6%	1.36	112
53 WA	34580 Mount Vernon-Anacortes, WA MSA	256	25.3%	634	18.7%	1.35	111
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	11.404	37.1%	26,944	27.4%	1.35	110
53 WA	48300 Wenatchee, WA MSA	211	25.1%	445	18.5%	1.35	109
48 TX	21340 El Paso, TX MSA	1,181	43.9%	3,699	32.7%	1.34	108
04 AZ	22380 Flagstaff, AZ MSA	121	19.9%	483	14.9%	1.34	107
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	2,111	28.7%	5,649	21.4%	1.34	106
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	1132	24.9%	2172	18.6%	1.34	105
12 FL	36740 Orlando-Kissimmee, FL MSA	9,279	37.0%	21,873	27.9%	1.33	104
42 PA	49620 York-Hanover, PA MSA	1,340	24.6%	1,945	18.6%	1.33	103
30 MT	13740 Billings, MT MSA	246	19.2%	428	14.5%	1.33	103
34 NJ	12100 Atlantic City, NJ MSA	1,223	35.2%	2,363	26.6%	1.33	101
01 AL	11500 Anniston-Oxford, AL MSA	397	40.3%	568	30.5%	1.32	100
17 IL	19180 Danville, IL MSA	223	35.6%	276	27.0%	1.32	99
42 PA	39740 Reading, PA MSA	1,163	24.8%	1,480	18.8%	1.32	98
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	294	24.6%	2,208	16.7%	1.32	96
12 FL	46940 Vero Beach, FL MSA	413	30.3%	2,206 951	23.0%	1.32	96
MD+WV	19060 Cumberland, MD-WV MSA	275			28.5%	1.31	95

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
53 WA	36500 Olympia, WA MSA	700	23.5%	1,457	17.9%	1.31	94
06 CA	42020 San Luis Obispo-Paso Robles, CA MSA	154	15.6%	1,100	11.9%	1.31	93
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	4,727	32.5%	12,247	24.8%	1.31	92
32 NV	39900 Reno-Sparks, NV MSA	1,242	24.2%	3,283	18.5%	1.31	91
18 IN	11300 Anderson, IN MSA	670	38.6%	626	29.5%	1.31	90
42 PA	27780 Johnstown, PA MSA	255	26.6%	427	20.4%	1.30	89
48 TX	15180 Brownsville-Harlingen, TX MSA	489	59.2%	2,002	45.5%	1.30	88
05 AR	26300 Hot Springs, AR MSA	209	30.8%	433	23.7%	1.30	87
53 WA	31020 Longview, WA MSA	353	32.9%	683	25.4%	1.30	86
10 DE	20100 Dover, DE MSA	495	28.3%	988	21.9%	1.29	85
41 OR	41420 Salem, OR MSA	1,204	30.4%	1,993	23.6%	1.29	84
12 FL	36100 Ocala, FL MSA	1,010	36.2%	2,558	28.2%	1.28	83
08 CO	24540 Greeley, CO MSA	906	30.5%	1,858	23.8%	1.28	82
08 CO	39380 Pueblo, CO MSA	762	40.7%	1,238	31.8%	1.28	81
53 WA	45104 Tacoma, WA MD	2,709	32.8%	8,097	25.7%	1.27	80
35 NM	42140 Santa Fe, NM MSA	212	19.5%	643	15.3%	1.27	79
27 MN	41060 St. Cloud, MN MSA	588	24.1%	682	18.9%	1.27	78
56 WY	16940 Cheyenne, WY MSA	288	23.8%	478	18.8%	1.27	77
42 PA	29540 Lancaster, PA MSA	940	19.2%	1,329	15.1%	1.27	76
48 TX	29700 Laredo, TX MSA	218	54.9%	1,414	43.3%	1.27	75
23 ME	38860 Portland-South Portland-Biddeford, ME MSA	1,490	22.1%	2,777	17.5%	1.26	74
48 TX	36220 Odessa, TX MSA	235	57.2%	654	45.3%	1.26	73
35 NM	22140 Farmington, NM MSA	136	34.9%	604	27.7%	1.26	72
37 NC	27340 Jacksonville, NC MSA	131	18.6%	540	14.8%	1.26	71
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	2,242	37.7%	5,366	30.0%	1.26	70
41 OR	21660 Eugene-Springfield, OR MSA	799	24.7%	1,654	20.0%	1.24	69
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	897	31.6%	1,631	25.5%	1.24	68
06 CA	23420 Fresno, CA MSA	1,992	38.1%	10,362	30.8%	1.24	67
32 NV	29820 Las Vegas-Paradise, NV MSA	7,922	36.1%	27,478	29.2%	1.23	66
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	515	40.1%	1,047	32.6%	1.23	65
06 CA	25260 Hanford-Corcoran, CA MSA	273	38.8%	1,416	31.9%	1.22	64
25 MA	49340 Worcester, MA MSA	2,394	23.8%	4,507	19.6%	1.22	63
35 NM	10740 Albuquerque, NM MSA	2,007	23.3%	4,100	19.2%	1.21	62
42 PA	30140 Lebanon, PA MSA	302	20.8%	409	17.2%	1.21	61
34 NJ	20764 Edison, NJ MD	5,933	21.8%	11,703	18.0%	1.21	60
30 MT	24500 Great Falls, MT MSA	138	20.9%	264	17.3%	1.21	59
53 WA	13380 Bellingham, WA MSA	335	16.9%	825	14.0%	1.21	58
12 FL	29460 Lakeland, FL MSA	2,390	41.8%	5,810	34.6%	1.21	57
AR+OK	22900 Fort Smith, AR-OK MSA	845	39.0%	1409	32.4%	1.20	56
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	893	27.1%	2243	22.5%	1.20	55
23 ME	30340 Lewiston-Auburn, ME MSA	370	31.3%	709	26.1%	1.20	54
33 NH	31700 Manchester-Nashua, NH MSA	1,047	20.4%	2,050	17.2%	1.18	53
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	6,961	38.3%	24,518	32.4%	1.18	52
36 NY	28740 Kingston, NY MSA	311	27.7%	949	23.5%	1.18	51
04 AZ	39140 Prescott, AZ MSA	421	23.0%	1,512	19.6%	1.17	50
16 ID	17660 Coeur d'Alene, ID MSA	362	21.5%	967	18.5%	1.16	49
06 CA	47300 Visalia-Porterville, CA MSA	992	38.5%	4,759	33.2%	1.16	49

Table 10 - NCRC Analysis: LMI/MUI

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
06 CA	17020 Chico, CA MSA	306	23.6%	1,358	20.7%	1.14	46
49 UT	39340 Provo-Orem, UT MSA	1,128	23.5%	2,377	20.7%	1.14	45
06 CA	12540 Bakersfield, CA MSA	2,541	40.0%	12,987	35.5%	1.13	44
32 NV	16180 Carson City, NV MSA	102	21.1%	339	18.9%	1.11	43
12 FL	39460 Punta Gorda, FL MSA	483		1,450	25.8%	1.10	42
51 VA	25500 Harrisonburg, VA MSA	189	18.2%	313	16.6%	1.09	41
06 CA	34900 Napa, CA MSA	87	15.5%	786	14.3%	1.08	40
06 CA	31460 Madera, CA MSA	305	35.0%	1,928	32.3%	1.08	39
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	1,364	26.3%	3,932	24.4%	1.08	38
06 CA	20940 El Centro, CA MSA	224	42.6%	2,347	39.5%	1.08	37
12 FL	34940 Naples-Marco Island, FL MSA	685	25.3%	2,855	23.5%	1.08	36
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,346	33.3%	5,378	31.1%	1.07	35
02 AK	11260 Anchorage, AK MSA	869	17.5%	1,496	16.4%	1.07	34
08 CO	24300 Grand Junction, CO MSA	416	22.5%	954	21.3%	1.06	33
12 FL	15980 Cape Coral-Fort Myers, FL MSA	2,137	35.3%	9,241	33.4%	1.06	32
06 CA	40900 SacramentoArden-ArcadeRoseville, CA MSA	4,320	24.3%	25,237	23.0%	1.06	31
04 AZ	49740 Yuma, AZ MSA	292	25.1%	1,429	23.8%	1.05	30
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	4524	25.2%	11755	24.3%	1.04	29
13 GA	19140 Dalton, GA MSA	475	29.9%	501	28.9%	1.03	28
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	3,785	40.9%	37,115	40.4%	1.01	27
06 CA	39820 Redding, CA MSA	272	23.4%	1,583	23.2%	1.01	26
25 MA	21604 Essex County, MA MD	1,583	18.5%	3,903	18.5%	1.00	25
41 OR	32780 Medford, OR MSA	358	20.9%	1,393	20.9%	1.00	24
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	1,291	13.3%	8,951	13.4%	0.99	23
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	9,260	31.8%	77,697	32.6%	0.97	22
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	753	16.7%	5,966	17.2%	0.97	21
ID+UT	30860 Logan, UT-ID MSA	163	16.8%	345	17.4%	0.97	20
49 UT	41100 St. George, UT MSA	248	21.1%	1,270	22.0%	0.96	19
06 CA	49700 Yuba City, CA MSA	205	27.4%	2,426	29.1%	0.94	18
06 CA	44700 Stockton, CA MSA	1,104	28.8%	12,656	30.6%	0.94	17
06 CA	36084 Oakland-Fremont-Hayward, CA MD	2,616	16.8%	21,565	18.0%	0.94	16
36 NY	35004 Nassau-Suffolk, NY MD	5,019	24.8%	18,159	26.5%	0.94	15
25 MA	14484 Boston-Quincy, MA MD	2,909	16.7%	9,542	18.4%	0.91	14
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	5,293	23.3%	88,682	26.0%	0.90	13
06 CA	32900 Merced, CA MSA	281	29.7%	4,292	33.2%	0.89	12
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,520	14.8%	21,908	17.2%	0.86	11
06 CA	33700 Modesto, CA MSA	845	25.9%	9,083	30.2%	0.86	10
06 CA	41500 Salinas, CA MSA	178	18.2%	3,159	21.3%	0.85	9
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	1,869	14.3%	18,441	16.9%	0.85	8
06 CA	46700 Vallejo-Fairfield, CA MSA	767	21.9%	6,428	25.9%	0.85	7
15 HI	26180 Honolulu, HI MSA	787	15.4%		18.3%	0.84	6
06 CA	42220 Santa Rosa-Petaluma, CA MSA	275	11.4%		14.0%	0.81	5
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	398	7.5%	4,939	9.2%	0.81	4
06 CA	42100 Santa Cruz-Watsonville, CA MSA	82	9.3%	1,078	12.3%	0.76	
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	2,353		44,982	23.6%	0.74	3 2
25 MA	12700 Barnstable Town, MA MSA	299		1,529	19.5%	0.62	1

Table 11 - NCRC Analysis: Overall Rank

MSA	African- American	LMI African- American	MUI African- American	Hispanic	LMI Hispanic	MUI Hispanic	Asian	MUI Asian	LMI Asian	LMI	Raw Score	Rank (1 being best)
16700 Charleston-North Charleston, SC MSA	244	180	214	211	158	122	0	0	0	342	210.14	116
14860 Bridgeport-Stamford-Norwalk, CT MSA	236	147	217	235	142	175	76	67	0	360	183.89	115
36540 Omaha-Council Bluffs, NE-IA MSA	216	162	190	137	68	139	0	0	0	316	175.43	114
33340 Milwaukee-Waukesha-West Allis, WI MSA	246	189	219	219	141	159	98	72	47	361	175.10	113
44140 Springfield, MA MSA	204	158	194	223	154	168	89	0	0	140	166.25	112
33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	237	183	215	233	161	171	102	90	46	185	162.30	111
37964 Philadelphia, PA MD	241	170	210	226	146	155	48	23	25	378	162.20	110
45940 Trenton-Ewing, NJ MSA	230	163	209	205	116	165	3	4	0	364	162.11	109
13820 Birmingham-Hoover, AL MSA	188	106	178	187	104	133	32	0	0	343	158.88	108
24860 Greenville, SC MSA	214	142	202	81	23	76	0	0	0	363	157.29	107
25540 Hartford-West Hartford-East Hartford, CT MSA	198	141	182	222	155	158	31	39	0	263	154.33	106
26900 Indianapolis, IN MSA	164	130	163	177	132		22	0		312	150.13	105
21604 Essex County, MA MD	229	143	212	238	165	176	82	71	0	25	149.00	104
34940 Naples-Marco Island, FL MSA	184	185	121	214	137	146	0	0	0	36		103
14484 Boston-Quincy, MA MD	235	166	211	236	152	174	54	53	0	14	143.89	102
24660 Greensboro-High Point, NC MSA	174	84	191	154	78	99	70	0		296	143.25	101
39580 Raleigh-Cary, NC MSA	248	191	224	231	160		14	14	0	37	140.67	100
16740 Charlotte-Gastonia-Concord, NC-SC MSA	202	139	192	167	62	151	65	41	34	344	139.70	99
49340 Worcester, MA MSA	226	179	201	224	149	170	26	16		63		98
24340 Grand Rapids-Wyoming, MI MSA	167	123	183	116	74	129	73	0	_	249		97
40060 Richmond, VA MSA	234	184	207	144	76		41	29		306		96
10900 Allentown-Bethlehem-Easton, PA-NJ MSA	119	119	113	196	130		29	0	0	269	138.63	95
35380 New Orleans-Metairie-Kenner, LA MSA	209	135	176	124	50	-	61	0	0	256		94
32820 Memphis, TN-MS-AR MSA	227	151	193	127	71	66	60	28	0	319		93
41180 St. Louis, MO-IL MSA	233	182	208	114	79	86	47	45	28	345		92
15764 Cambridge-Newton-Framingham, MA MD	247	190	222	241	167	178	33	24	18	47	136.70	91
35084 Newark-Union, NJ-PA MD	189	153	150	195	120	136	27	0		115		90
23844 Gary, IN MD	192	159	159	75	81	42	0	0	-	235		89
47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	222	174	186	104	77	63	97	85		288		88
39740 Reading, PA MSA	171	73	181	166	100	126	0	0	0	116		87
35980 Norwich-New London, CT MSA	90	28	114	234	157	173	0	0	0	133		86
41884 San Francisco-San Mateo-Redwood City, CA MD	203	177	162	239	0		101	88	42	4	132.56	85
47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	178	140	156	207	115	161	57	54	20	218		84
12580 Baltimore-Towson. MD MSA	176	124	165	176	69	149	75	74	24	272	130.40	83
19780 Des Moines, IA MSA	127	61	160	120	46		67	0	0	327	129.71	82
12060 Atlanta-Sandy Springs-Marietta, GA MSA	201	121	205	170	98	140	35	58	7	248		81
42644 Seattle-Bellevue-Everett, WA MD	159	65	151	225	156	156	88	80		157	126.40	80
35300 New Haven-Milford, CT MSA	150	74	161	201	140	144	11	0	0	123	125.50	79
42260 Sarasota-Bradenton-Venice, FL MSA	160	129	112	210	126	150	72	64	0	106		78
19740 Denver-Aurora, CO MSA	113	44	139	213	144	148	83	76	35	259	125.40	77
29404 Lake County-Kenosha County, IL-WI MD	80	27	135	212	135	166	42	60		341	121.90	76
13644 Bethesda-Gaithersburg-Frederick, MD MD	144	109	140	208	131	172	40	49	16	206		76 75
39300 Providence-New Bedford-Fall River, RI-MA MSA	144	109	123	218	129	162	95	83	0	200		75 74
45780 Toledo, OH MSA	122	77	123	132	84	102	95	03 0	0	29 222	121.33	74
	187	164	141	155	102	105	51	51	0	120	121.14	73 72
16974 Chicago-Naperville-Joliet, IL MD 12420 Austin-Round Rock, TX MSA	92	36	141	180	102			1	0	365		72 71
· · · · · · · · · · · · · · · · · · ·	211	156	189	71	53	138 48	2 12	13	0	365 271	119.22	71
17460 Cleveland-Elyria-Mentor, OH MSA	132							76		317		
19124 Dallas-Plano-Irving, TX MD	132	38	172	163	70	125	7	76	5	317	110.50	69

Table 11 - NCRC Analysis: Overall Rank

MSA	African- American	LMI African- American	MUI African American	Hispanic	LMI Hispanic	MUI Hispanic	Asian	MUI Asian	LMI Asian	LMI	Raw Score	Rank (1 being best)
28140 Kansas City, MO-KS MSA	207	149	180	40	45	45	58	31	37	303	109.50	68
27260 Jacksonville, FL MSA	173	113	138	80	44	72	79	69	30	294	109.20	67
41620 Salt Lake City, UT MSA	84	0	0	206	150	145	44	46	17	171	107.88	66
29620 Lansing-East Lansing, MI MSA	107	111	103	90	65	93	0	0	0	180	107.00	65
47644 Warren-Farmington Hills-Troy, MI MD	191	154	200	106	90	83	9	9	13	212	106.70	64
18140 Columbus, OH MSA	134	87	126	145	122	75	18	10	26	324	106.70	63
38300 Pittsburgh, PA MSA	141	57	153	17	51	0	1	0	0	321	105.86	62
48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	166	125	134	151	93	95	55	33	0	92	104.89	61
38900 Portland-Vancouver-Beaverton, OR-WA MSA	116	70		227	162		30	38	9	126		60
31140 Louisville, KY-IN MSA	133	103		27	5		0	0	0	278		59
11260 Anchorage, AK MSA	104	69		202	0		103	91	45	34	-	58
35004 Nassau-Suffolk, NY MD	108	114	84	182	128		45	0	0	15		57
17140 Cincinnati-Middletown, OH-KY-IN MSA	175	138	-	36	60	-	4	2	0	291		56
39900 Reno-Sparks, NV MSA	76	0	70	161	89		99	87	0	91		55
19804 Detroit-Livonia-Dearborn, MI MD	163	116		117	82		16	3	43	217		54
17820 Colorado Springs, CO MSA	46	54	59	178	135		87	68		128		53
42220 Santa Rosa-Petaluma, CA MSA	75	0		216	0	-	91	77	0	5	-	52
12100 Atlantic City, NJ MSA	97	66	85	149	97	108	92	82	39	101		51
34980 Nashville-DavidsonMurfreesboro, TN MSA	123	63		35	8		69	65		326		50
	88	101	80	88	86		09	00	0	113		49
40420 Rockford, IL MSA				00 72			-	-	- 1			
48864 Wilmington, DE-MD-NJ MD	109	94	87		66		5	0	0	219		48
40900 SacramentoArden-ArcadeRoseville, CA MSA	98	97	69	172	117	100	85	70		31		47
36420 Oklahoma City, OK MSA	117	76		107	80		15	12	0	205		46
46060 Tucson, AZ MSA	48	35		186	127	121	23	15		168		45
38060 Phoenix-Mesa-Scottsdale, AZ MSA	38	11	44	190	125		59	48	12	183		44
15804 Camden, NJ MD	124	85	118	126	96		24	18	23	131		43
45104 Tacoma, WA MD	73	82	56	131	123		96	84	31	80		42
35644 New York-White Plains-Wayne, NY-NJ MD	140	99		173	67	102	50	0	1	2	82.11	41
23580 Gainesville, GA MSA	101	48		32	12		0	0	0	175		40
20764 Edison, NJ MD	106	133		162	118		6	5		60		39
36084 Oakland-Fremont-Hayward, CA MD	100	78		194	103		52	40	8	16		38
41740 San Diego-Carlsbad-San Marcos, CA MSA	58	37	45	181	121	104	81	62		11	-	37
48620 Wichita, KS MSA	96	105	71	51	26	41	17	0	0	200	75.88	36
41980 San Juan-Caguas-Guaynabo, PR MSA	2	90		14	27	11	0	0		380		35
15980 Cape Coral-Fort Myers, FL MSA	53	79	38	156	99	92	66	55		32	74.44	34
42044 Santa Ana-Anaheim-Irvine, CA MD	37	0	26	209	119	141	56	43	6	8	71.67	33
37100 Oxnard-Thousand Oaks-Ventura, CA MSA	45	0	40	175	106	106	38	27	0	21	69.75	32
26420 Houston-Sugar Land-Baytown, TX MSA	85	26	106	86	30	79	8	11	3	255	68.90	31
23104 Fort Worth-Arlington, TX MD	65	34	97	82	48	59	25	21	10	238	67.90	30
26180 Honolulu, HI MSA	42	0	29	150	0	87	94	81	44	6	66.63	29
37340 Palm Bay-Melbourne-Titusville, FL MSA	68	46	68	64	43	57	62	59	0	132	66.56	28
36100 Ocala, FL MSA	79	81	64	63	35		0	0	0	83	65.14	27
45300 Tampa-St. Petersburg-Clearwater, FL MSA	72	62	55	105	75		39	35	15	110	64.60	26
46700 Vallejo-Fairfield, CA MSA	41	98		96	72		100	86	0	7		25
38940 Port St. Lucie-Fort Pierce, FL MSA	67	56		108	40		74	61	0	35		24
41700 San Antonio, TX MSA	3	2		69	41	52	13	19		354		23
41940 San Jose-Sunnyvale-Santa Clara, CA MSA	33	0	28	203	124		10	6	11	12		22
39100 Poughkeepsie-Newburgh-Middletown, NY MSA	81	45		97	92		20	20		38		21
19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	87	88		52	38		28	0		70		20
36740 Orlando-Kissimmee, FL MSA	62			84			36	34		104		19

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MSA	African- American	LMI African- American	MUI African- American	Hispanic	LMI Hispanic	MUI Hispanic	Asian	MUI Asian	LMI Asian	LMI	Raw Score	Rank (1 being best)
29820 Las Vegas-Paradise, NV MSA	24	8	22	111	94	65	77	63	38	66	56.80	18
46140 Tulsa, OK MSA	69	52	63	21	4	30	0	0	0	155	56.29	17
22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	71	50	61	49	49	31	71	57	36	52	52.70	16
28660 Killeen-Temple-Fort Hood, TX MSA	8	14	180	19	6	18	0	0	0	118	51.86	15
29460 Lakeland, FL MSA	40	39	31	60	33	50	64	56	0	57	47.78	14
23420 Fresno, CA MSA	21	7	18	61	34	39	78	66	0	67	43.44	13
10740 Albuquerque, NM MSA	13	0	21	58	54	46	37	42	0	62	41.63	12
49700 Yuba City, CA MSA	28	0	20	76	0	44	53	44	0	18	40.43	11
47220 Vineland-Millville-Bridgeton, NJ MSA	34	24	37	46	37	37	0	0	0	65	40.00	10
41500 Salinas, CA MSA	6	0	4	65	36	35	90	75	0	9	40.00	9
47300 Visalia-Porterville, CA MSA	23	0	16	29	11	25	86	73	0	48	38.88	8
12540 Bakersfield, CA MSA	20	13	15	44	20	33	63	47	0	44	33.22	7
33700 Modesto, CA MSA	11	0	7	33	28	24	68	50	0	10	28.88	6
44700 Stockton, CA MSA	18	18	13	42	19	26	49	36	40	17	27.80	5
31084 Los Angeles-Long Beach-Glendale, CA MD	29	25	23	59	15	38	43	30	2	13	27.70	4
40140 Riverside-San Bernardino-Ontario, CA MSA	19	10	14	41	21	27	46	32	19	22	25.10	3
33124 Miami-Miami Beach-Kendall, FL MD	22	22	17	16	10	13	34	26	0	27	20.78	2
32900 Merced, CA MSA	5	0	3	24	7	19	21	17	0	12	13.50	1

Table 12 - NCRC Analysis: Disparitiy Ratios

	African- Americans v. Whites	LMI African- Americans v. LMI Whites	MUI African- Americans v. MUI Whites	Asian v. Whites	LMI Asians v. LMI Whites	MUI Asians v. LMI Whites	Hispanics v. Whites	LMI Hispanics v. LMI Whites	MUI Hispanics v. MUI Whites	LMI v. MUI
Disparity Ratio > 3										
Number of MSAs	17	2	28	0	0	0	4	0	6	1
Percent of MSAs	6.8%	1.0%	12.4%	0.0%	0.0%	0.0%	1.7%	0.0%	3.4%	0.3%
Disparity Ratio 2.5 to 3										
Number of MSAs	47	10	63	0	0	0	9	2	21	0
Percent of MSAs	18.7%	5.1%	28.0%	0.0%	0.0%	0.0%	3.7%	1.2%	11.8%	0.0%
Disparity Ratio 2 to 2.5										
Number of MSAs	107	58	76	0	0	0	36	8	48	3
Percent of MSAs	42.6%	29.7%	33.8%	0.0%	0.0%	0.0%	14.9%	4.8%	27.0%	0.8%
Disparity Ratio 1.5 to 2										
Number of MSAs	62	105	44	4	0	4	126	51	67	197
Percent of MSAs	24.7%	53.8%	19.6%	3.8%	0.0%	4.4%	52.3%	30.5%	37.6%	51.8%
Disparity Ratio 1.0 to 1.5										
Number of MSAs	14	20	12	16	4	19	62	98	35	156
Percent of MSAs	5.6%	10.3%	5.3%	15.2%	8.5%	20.9%	25.7%	58.7%	19.7%	41.1%
Disparity Ratio Below 1.0										
Number of MSAs	1	0	2	85	43	68	4	8	1	23
Percent of MSAs	0.4%	0.0%	0.9%	81.0%	91.5%	74.7%	1.7%	4.8%	0.6%	6.1%
Total	251	195	225	105	47	91	241	167	178	380