

# 2017 Assessment of Fair Housing (AFH) Sandy Springs, GA



**SANDY SPRINGS™**  
GEORGIA

**DRAFT 07.20.17**

**Adopted: TBD**

**Submitted: TBD**

**U.S. Department of Housing and Urban Development  
Atlanta Region IV Office  
Five Points Plaza Building**



# Assessment of Fair Housing Tool for Local Governments

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I. Cover Sheet

1. Submission date: TBD
2. Submitter name: City of Sandy Springs
3. Type of submission: Single Program Participant
4. Type of program participant(s): Consolidated Plan
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable):
7. Sole or lead submitter contact information:
  - a. Name:
  - b. Title:
  - c. Department: Community Development
  - d. Street address: 7840 Roswell Road, Building 500
  - e. City: City of Sandy Springs
  - f. State: GA
  - g. Zip code: 30350
8. Period covered by this assessment: 2017
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

(Signature) (date)

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12. Departmental acceptance or non-acceptance:

(Signature) (date)

Comments (Appendix B)

## II. Executive Summary

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The City of Sandy Springs first qualified as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program in 2008. Cities and counties that participate in the CDBG Program assist HUD with its mission to ensure fair and equal housing opportunities for all. CDBG entitlement communities annually certify that they work to promote fair housing in their communities. The Assessment of Fair Housing Analysis (AFH) helps to identify possible obstacles that may restrict or deny opportunities to freely select where a person or family wants to live, a right guaranteed by the Civil Rights Act of 1968.

The Federal Fair Housing Act prohibits discrimination in housing and housing related services on the basis of race, color, religion, sex, national origin, disability or familial status. The Georgia Fair Housing Act is substantially equivalent to the Federal Fair Housing Law and prohibits various forms of discrimination in residential real estate transactions on the same basis as the federal FHA. Additionally, the Georgia Fair Housing Law prohibits a local government or "political subdivision of this estate" from adopting its own fair housing law by extending protection to other classes outside of those already protected by the Federal FHA.

In 2015, HUD adopted the Affirmatively Furthering Fair Housing (AFFH) rule to enhance the regulatory framework of the 1968 Fair Housing Act. The purpose of the AFFH Rule is to ensure that program participants are taking meaningful action to combat patterns of segregation, promote fair housing choice, and foster inclusive communities free from barriers that restrict access to opportunity. Under the AFFH rule, CDBG program participants are required to conduct the newly developed **Assessment of Fair Housing (AFH)**.

The AFH reviews HUD-provided demographic and geospatial data, as well as a series of metrics to measure patterns in segregation levels, racially concentrated areas of poverty, disparities in access to opportunities, and disproportionate housing needs at the neighborhood level and across all racial and ethnic groups. The AFH also examines publicly supported housing, disability access to housing and services, and fair housing enforcement. The AFH requires program participants to review additional local data, regulations, administrative policies, procedures, and practices that significantly contribute to or perpetuate fair housing in the City. Through the AFH process, the City assesses fair housing issues, identifies the factors that contribute to those issues, and **must establish fair housing priorities and goals** to continue affirmatively furthering fair housing.

Participants in this analysis included the City of Sandy Springs, CDBG stakeholders comprised of community and faith leaders, non-profit organizations, the Fair Housing Division of the Georgia Commission on Equal Opportunity (GCEO), Metro Atlanta Fair Housing, and the Housing Authority of Fulton County (HAFC), as well as residents of Sandy Springs.

The draft of the AFH is the result of significant research and data analysis as well as a robust community engagement process. For this effort, the City conducted three community meetings for the general public in the north, south and central areas of the city, as well as two city-wide public

hearings, and two stakeholder meetings where a variety of service providers organizations and community leaders were invited to provide valuable input. These meetings included both interactive discussions for data gathering as well as on-site survey for written comments. A combination of quantitative data, qualitative research and local knowledge contributed to the identification of fair housing issues in the City of Sandy Springs. Factors that contribute to fair housing issues were identified and organized in priority order based on the analysis performed in this report.

The City of Sandy Springs undertook this effort on the heels of adopting its updated Comprehensive Plan called “*The Next 10.*” The Next 10 work underscored the intrinsically regional nature of fair access to housing and transportation, which emerged as an important issue to residents providing input into the AFH. Addressing the regional need, the Department of Community Affairs (DCA) and the Atlanta Regional Commission (ARC) launched a new Regional Housing Task Force in the spring of 2017. At the time of reporting, this Task Force has met just twice; however it creates a strategic opportunity for the City of Sandy Springs and sister cities to coordinate efforts in addressing fair housing needs.

The following provides a brief summary of the key findings for each fair housing issue assessed through the AFH process:

## Segregation and Integration

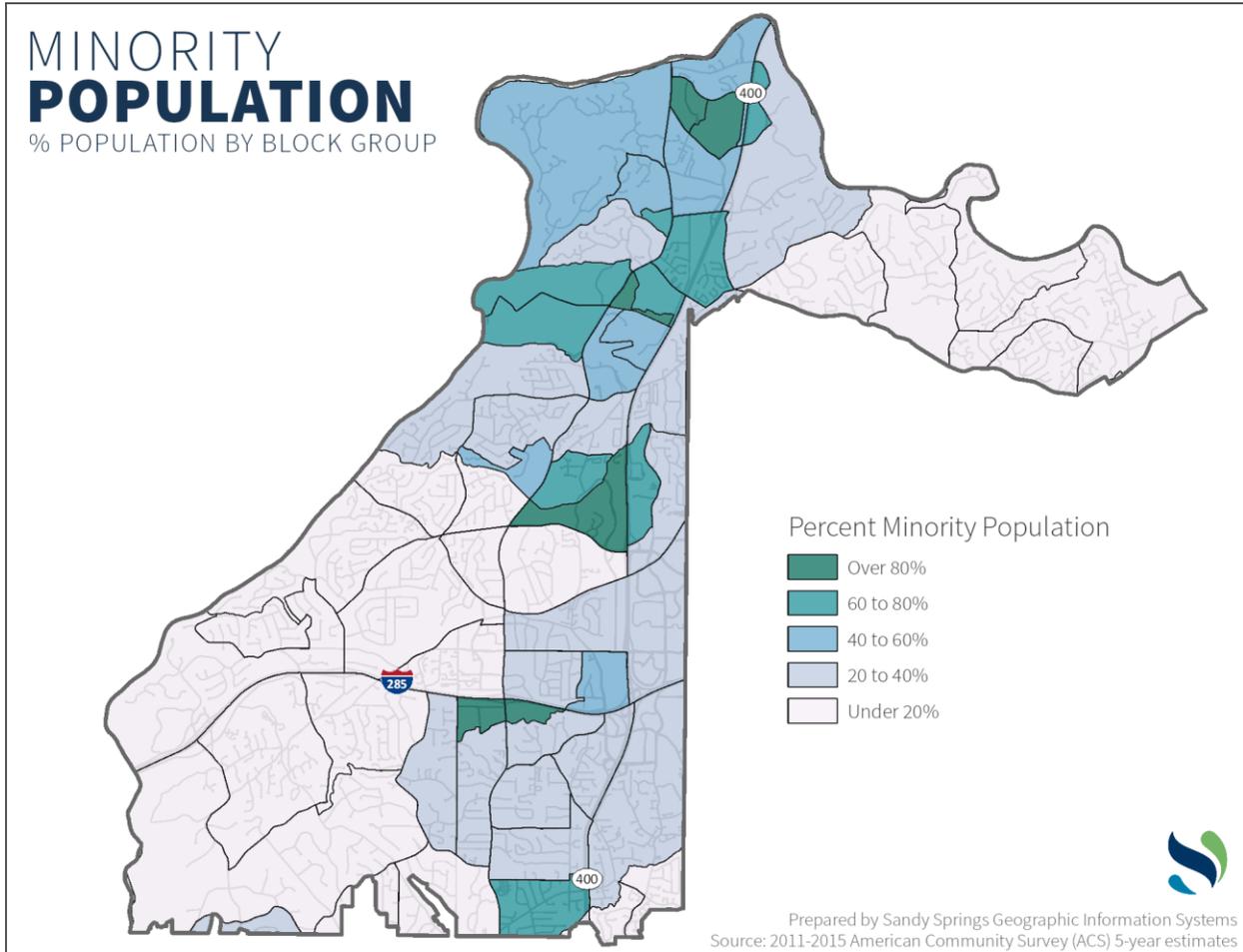
Based on the Dissimilarity Index, HUD’s analytical tool for measuring segregation levels by race group, the City of Sandy Springs continues to experience fairly **low or moderate levels** of segregation overall. The Index generates a 100-point scale for each racial group, whereby a value of 0 means perfect integration and a value of 100 indicates complete segregation. From 1990 to 2000, the Index showed low or very low levels of segregation across all racial and ethnic groups in the Sandy Springs area. In 2010, Sandy Springs experienced a ten-point uptick across all groups in the Index, with Hispanics scoring the highest value of 52, which suggests conditions of moderate segregation.

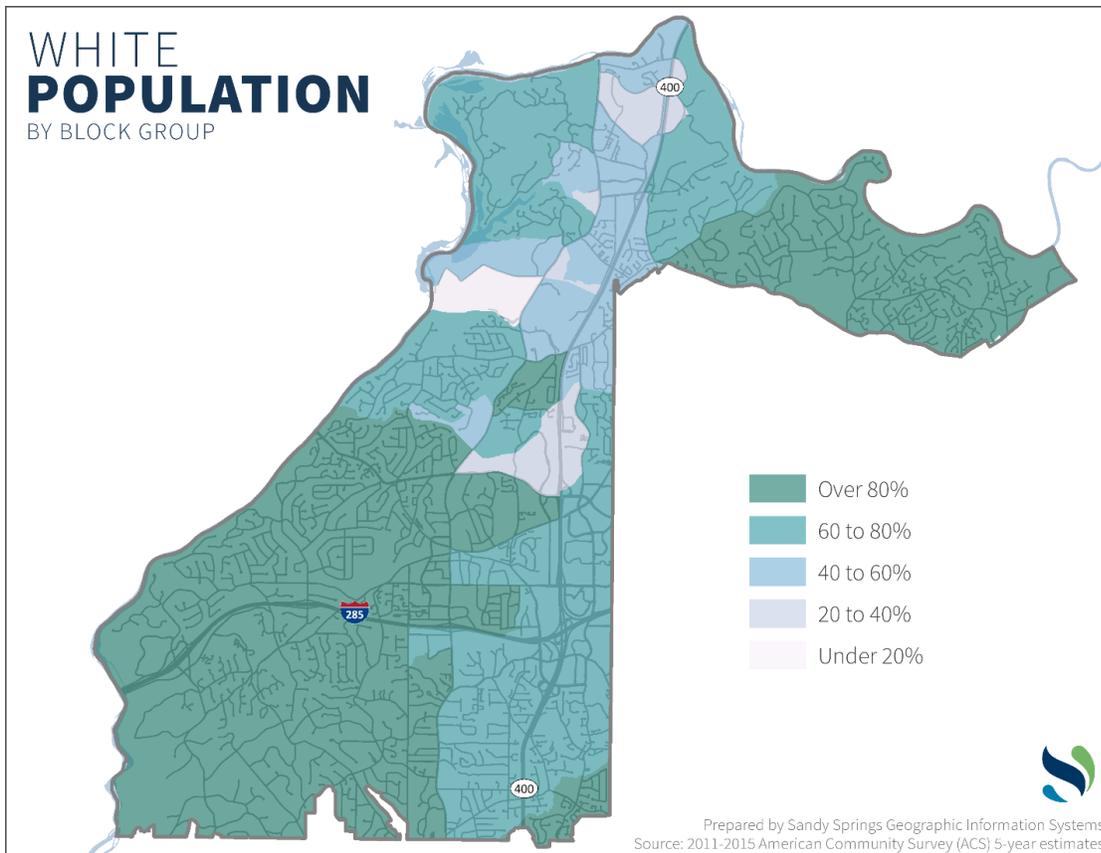
These scores rank below that experienced at the regional level, where the highest 2010 Index value reached around 60 for Black populations and 55 for the White population.

Still, census mapping does show some geographic concentrations by race – two, large, low-density areas of the city exist where Whites constitute 80% or more of the population. All remaining areas demonstrate fairly intense integration of White, Black, Hispanic, and Asian groups (either majority minority or approximately 50/50% distribution of population groups), with the exception of a few small neighborhood pockets in which one of three minority groups comprise 60-80% of the residential population (Asian, Black or Hispanic). See maps below. Analysis shows that the areas where renter populations concentrate are fairly integrated; Whites comprise the greatest percent of all renters at 42% overall.

The AFH requires identification of the **factors that contribute to segregation**, where found. The data demonstrate that economic factors of very high home values are associated with areas of highly concentrated White populations. While historic land use practices contributed to these two areas of the city developing almost entirely as large-lot, single family residential neighborhoods, **median**

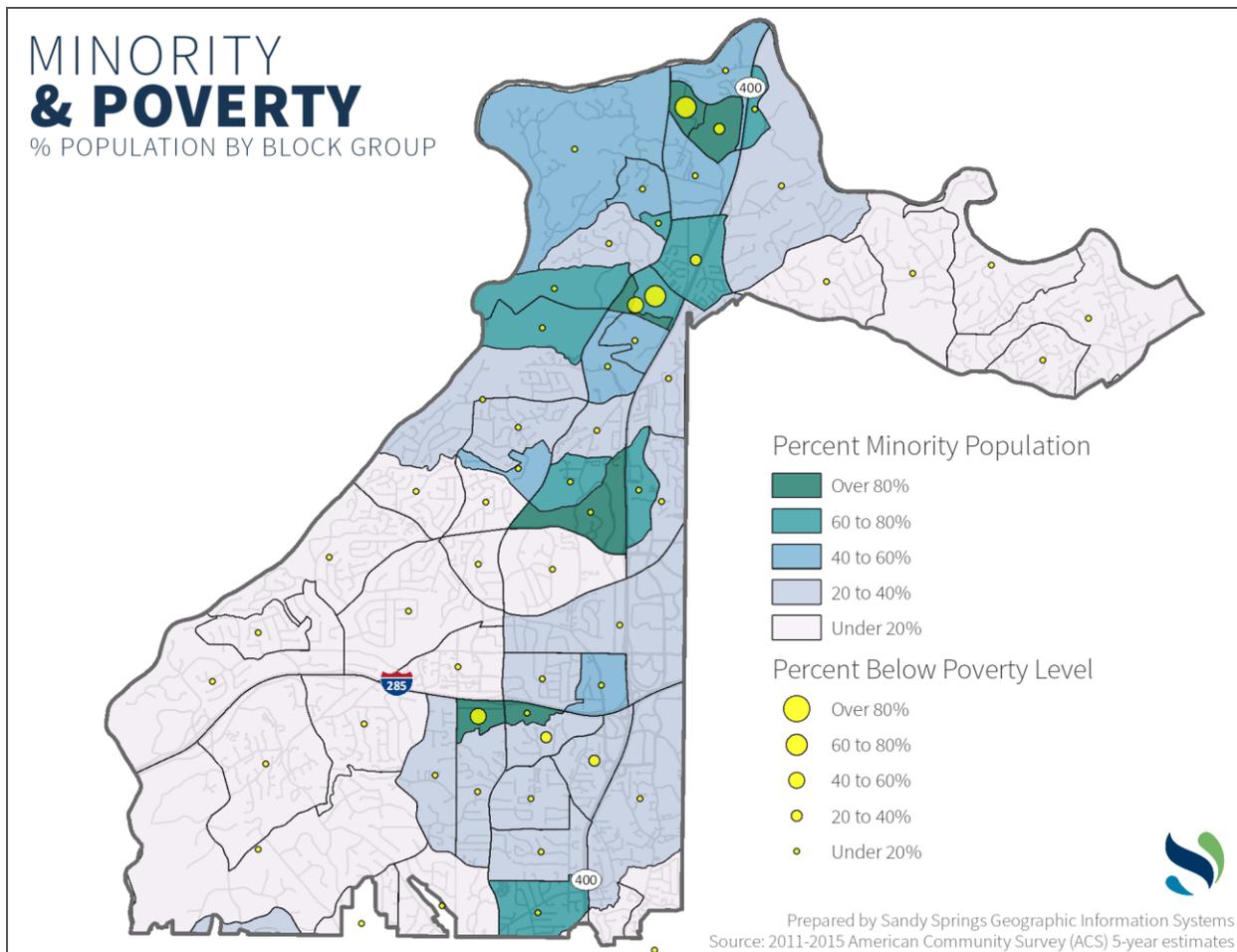
home values are twice as those of Atlanta, thus the observed segregation appears associated with income.





## Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

The data provided by HUD defines racially and ethnically concentrated areas of poverty as census tracts that have a non-White population of 50% *and* where 40 % or more individuals live at or below the poverty level. The data show **no R/ECAP areas** in the City. However, based on the 2011-2015 American Community Survey, one can identify areas potentially emerging as such which may warrant policy considerations. Specifically, two low-income ethnically concentrated areas exist in the Northridge Road area and Dunwoody Place, to the north, and another area near the Prado commercial center (south along Roswell Road). Each of these show 60% to 80% of the households living below the poverty level, as well as coinciding with high percentages of minority populations (see map below). Factors that contribute to R/ECAPs often include location of available, low rent housing, displacement of residents due to economic pressures, lack of private investment, and the presence of poor quality housing.



## Disparities in Access to Opportunity

To analyze disparities in access to opportunity, HUD developed a two-stage process. First, HUD quantifies the degree to which a neighborhood offers amenities such as **access to education, employment, transportation**, among others. Second, HUD compares rankings across racial and economic subgroups to characterize **disparities** in access to opportunity.

According to the Opportunity Index created by HUD (values 0-100), all groups in Sandy Springs show **high labor force participation** in any given neighborhood with **little disparity** (range 81-89).

All groups however score only moderately on indicators related to access to proficient schools and exposure to poor air quality. White populations show slight advantages over other groups – with a 13 and 9 point difference in access to schools and air quality measures respectively, over Hispanics. Note that air quality is a regional issue primarily associated with emissions as monitored by federal government agencies. Thus proximity to high congestion corridors will create conditions lowering environmental health.

The **greatest disparity** across Sandy Springs race and ethnic groups emerges in the analysis of those who have more or less **exposure to poverty** in the neighborhoods in which they live. The higher the score on the measure, the *less* likely a group experiences constant exposure of poverty. On this measure, most minority groups in Sandy Springs **shared moderate** exposure, yet Black and Hispanic populations experience a higher likelihood of exposure than Whites by a measure of around 20 points. Income levels, lack of private investment in specific neighborhoods, availability, location, and quality of affordable housing, and land patterns separating single family housing from commercial and mixed-use development are likely factors that have contributed to disparities in exposure to poverty.

Community stakeholder input revealed that low and moderate income households face barriers to accessing **childcare services** and convenient, reliable **transportation** options. Residents and service providers reported no reasonably priced, much less affordably priced child-care facility within the City. Regarding transportation, these stakeholders cited: proximity to MARTA bus and rail stops excessive; bus routes limited to Roswell Road problematic; and frequency and duration of stops creating excessive lengths to work-commute trips. Data from 2015 shows that median rents along Roswell Road north of I-285 range from \$1,200 to \$1,500, narrowing convenient access to the Roswell Road routes to those with incomes for which this rent is affordable.

## Disproportionate Housing Needs

To understand trends in housing conditions and needs, HUD focuses analysis on four types of housing problems: the lack of a complete **kitchen**; lack of complete **plumbing; overcrowding** (more than one person per room), and; **cost burden** (housing costs exceeding 30% of monthly income) or severe cost burden. In Sandy Springs overall, Blacks and Hispanics seem to most disproportionately experience these types of housing problems, with data showing 50% of these households compared to about 30% of White households reporting any housing problem. The data suggests that cost burden constitutes nearly all cases of housing problems reported.

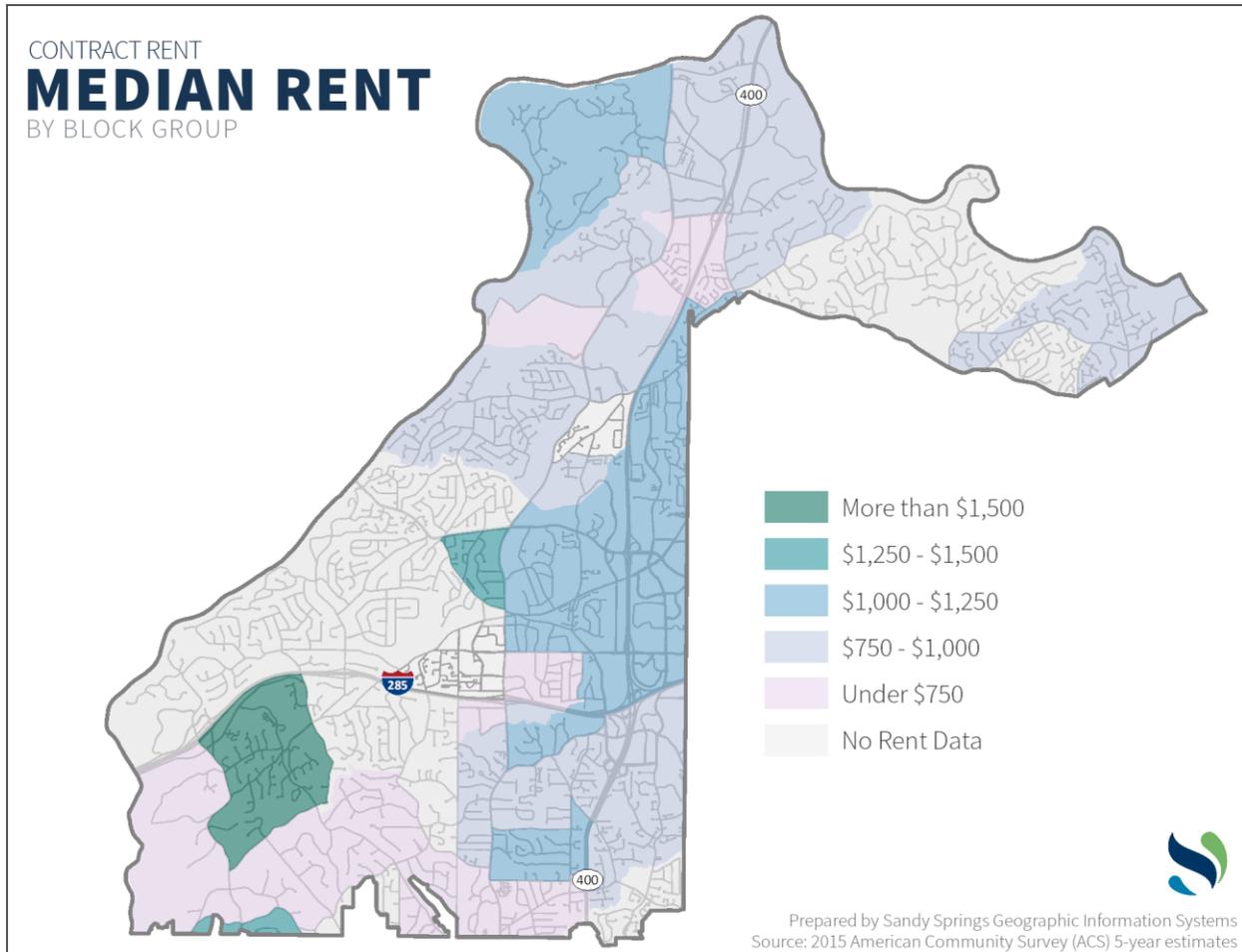
Just over **6,000 Sandy Springs households** experience severe cost burdened conditions – where a household expends more than 50% of income for monthly housing. Approximately half of those are White (3,390) and around one-third are Black households (1,855).

Later chapters in the AFH report explore how the question of affordability is complicated by the high costs of transportation in the Atlanta-Metropolitan region. The Atlanta Regional Commission generated an analysis showing that, geographically, *the majority* of areas in the region spends **50% of household income on housing and transportation costs** combined. These affects are very geographically specific, and about half of Sandy Springs falls within these areas.

The 2017 Average Median Income (AMI) published by HUD for the Sandy Springs area is **\$69,700**. For households earning **50% AMI** (around \$35,000) - without regard to household size – an affordable monthly housing cost would be **\$871**, where “affordable” means costs no more than 30% of total income. Just over one-fourth of all Sandy Springs households earn \$35,000 per year or less. The map below identifies the geographic distribution of median, contracted rent rates throughout

the city. The areas in the southwest indicating rents below \$750 are comprised almost entirely of low-density, single-family residential units.

The greatest factor likely contributing to cost burden cases in the City is the high cost housing market. Factors such as lack of private investment, availability in size and quality of affordable housing, and potentially enforcement of building code (which is dependent upon complaint-driven responses) may potentially contribute to disproportionate experiences of housing problems as well.



## Publicly Supported Housing

Public Housing in the City of Sandy Springs is provided and managed by the Housing Authority of Fulton County (HAFC) and not by the City. There are approximately 322 units under the project based Section 8 program: the Campbell Stone North Apartments with 197 units and the Hellenic Tower with 125 units. Both facilities serve senior residents and are primarily occupied by White residents with 82% and 72%, respectively in each development. Under the Housing Voucher Program, Whites and Blacks participate in similar percentages of 41% and 49%, respectively.

Additionally, the HAFC operates two public housing within the City limits - the Belle Isle Apartments with nine units, which serves families, and Sterling Place with 100 units, which exclusively serves senior residents and the disabled. There are 34 housing vouchers in the City; according to the HAFC, housing vouchers used to help hundreds of families in the past, but the increase in housing rents have caused a decline in the total number of vouchers offered in the City.

## Disability and Access

Estimates published by the Census Bureau show that 6,279 people with **disabilities** live in the City of Sandy Springs making up 7% of the total population (2010-2014). Of these, 3,150 individuals are senior citizens, while 2,714 individuals with a disability are between the ages of 18 and 64. Further, 415 are children between the ages 5 and 17 (Selected Social Characteristics ACS, 2010-2014). Types of disabilities include hearing, vision, cognitive, ambulatory disability, self-care and independent living difficulty. Federal and State laws require minimum design accessible standards for people with disabilities in public and private housing developments, in conformance with the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).

Service providers report that some of the housing challenges that people with disabilities face are typically related to property owners' denial to provide reasonable structural accommodations in for-sale or for-rent units; lack of housing units that are already accessible, financial burdens related to out-of-pocket payment for structural improvements; or additional financial burdens associated with payment of healthcare costs. Factors that contribute to disability and access issues include a lack of affordable in-home or common-based supportive services, limited range and unit size of affordable, accessible housing.

## Fair Housing Enforcement and Outreach

Local and regional agencies that provide fair housing information as well as enforcement and outreach include the Atlanta Metro Fair Housing (AMFH), The Housing Authority of Fulton County (HAFC), the Georgia Commission on Equal Opportunity (GCEO), and Atlanta Regional Commission (ARC). Through these agencies, residents of the City of Sandy Springs are able to find additional information related to affordable housing options, publicly supported housing programs, fair housing complaints, and homeownership education. The City's Code Enforcement officers also distribute information regarding services for those seeking housing assistance and information.

In the City of Sandy Springs there have been housing complaints filed under the GCEO and the Atlanta's FHEO regional office, totaling 32 complaints with the GCEO and 80 complaints with the FHEO from 2010 to 2016. The most common reported complaints were based on race, national origin, and disability. Issues related to the complaints included discriminatory terms, conditions, privileges relating to rental housing and facilities as well as denying or making housing unavailable.

Of all housing complaints filed with HUD, half of the cases (16 out of 32) were closed due to "no cause determination", after HUD's investigation and findings of "no reasonable cause" to believe that housing discrimination occurred or was about to occur. Additionally, four complaints were withdrawn by the complainant after resolution, one complaint elected to go to court, and three

complaints were closed due to complainant not willing to cooperate or because the complainant was not able to be located. A total of **seven complaints** were successfully closed in conciliation and **just one** ended up in settlement in favor of the complainant totaling \$13,000. Factors that contribute to deficiencies of fair housing enforcement and outreach include limited, local private fair housing outreach and enforcement.

## Contributing Factors Summary

The following provides a summary of the contributing factors identified for each of the housing issues based on analysis and feedback received through the public and stakeholder engagement. Priority levels have been assigned to each of the selected contributing factors, defined as follows:

- High: Factors that significantly limit or deny fair housing choice or access to opportunity.
- Medium: Factors that moderately limit or deny fair housing choice or access to opportunity.
- Low: Factors that have limited impact on fair housing issues.

Contributing Factor	Priority	Discussion
<b>Segregation/Integration</b>		
Displacement of residents due to economic pressures.	Medium	<p><b>A.</b> Meeting participants raised concern about growth pressures continuing to increase rents and starter home price-points. Some reported currently seeking residence outside of the City or with family. The City adopted the Next 10 Comprehensive Plan in February 2017, in which the City commits to: “adopt[ing] workforce housing policies and programs directed at improving affordability of rental and/or for sale housing for middle income households.” To implement this policy, the new Development Code (August 2017 target date) provides (1) requirements for workforce unit set-asides and (2) incentives for the redevelopment of aging large apartment complexes into mixed-use and mixed-income development. This requirement will help create more affordable units with lower rents in new multi-family developments. These regulations aim to mitigate against potential displacement of existing residents due to rising housing values and rent rates.</p>
Location, type, quality, of affordable housing	High	<p><b>B.</b> Most of the available affordable housing units are located within rental complexes which provide around 22,000 dwelling units. According to county tax assessor’s data, around 60% of these were constructed between 1950 and 1980. Since incorporation, the City of Sandy Springs has worked to improve the physical conditions of these aging complexes through a monthly program of apartment sweeps. While resulting in greater aesthetic and basic environmental improvements, some renters reported interior conditions as lacking; increasing tenant confidence to contact Code Enforcement officers may help improve this. Complaints included issues with flooding, dysfunctional A/C, ceiling and wall holes, water leaks, and rodents. Code Enforcement received over 80 such maintenance complaints in 2016.</p>

Contributing Factor	Priority	Discussion
<b>Segregation/Integration</b>		
Location, type, quality, of affordable housing	High	<b>B. Cont'd</b> Additionally, the stock of lower priced single-family homes continues to decrease as land values create economic pressure for new infill. However, new affordable units will be delivered under the new proposed zoning requirement to dedicate set-asides for 60-80% AMI, depending on the specific project.
Land Use and Zoning Laws	Low	<b>C.</b> The historic zoning ordinance inherited from Fulton County generated typical suburban development patterns with large areas of the city dedicated primarily to large lot, single family homes. This pattern and the location of these neighborhoods at the center of office and medical employment and at the interchange of I285 and GA 400 - the most convenient access for travel anywhere in the region – help make this some of the highest valued residential real estate in the region. Recognizing these factors, the City’s new Zoning Code draft aims to achieve the Policy Goal of achieving greater balance of housing choice through allowing more product housing types and inclusionary zoning requirements.
<b>Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)</b>		
Lack of private investment in specific neighborhoods	Medium	<b>D.</b> Although the data shows no areas in the City where concentrations of poverty coincide strongly with racially concentrated neighborhoods, a few neighborhoods vulnerable to this potential do exist. In the Next 10 Comprehensive Plan, the City identifies redevelopment and investment desirable for the areas along the northern end of Roswell Road, as well as areas in the existing Opportunity Zone, south of I-285 along Roswell Road, which include the vulnerable neighborhoods. Further, these are both areas benefitting from the CDBG grant used to invest in sidewalk infrastructure.

Contributing Factor	Priority	Discussion
<b>Racially/Ethnicly Concentrated Areas of Poverty (R/ECAP)</b>		
Deteriorated and abandoned properties	High	<b>E.</b> The City’s Code Enforcement division tracks and routinely inspects the handful of properties inventoried as vacant. Deteriorating properties are few, due to the dedicated monthly apartment sweeps, but complaints received include water leaks, and flooding, holes in walls and ceilings, and the lack of cooperation and diligence from part of the property management to properly repair those units in a timely manner. One older, owner-occupied condominium complex resident reports challenges contending with the lack of stormwater infrastructure on the property. Code Enforcement provides housing services information to tenants who are victim to problems, and this is a service area the AFH document considers expanding. In order to protect the health and safety of residents, the Code Enforcement Division performs on average 12 apartment sweeps per year and 12 re-inspections by rotating 75+ properties over the course of 5 years. Notice of violations are also issued to keep code compliance.
Displacement of residents due to economic pressures.	Medium	<b>F.</b> Several participants of the community meetings for the AFH reported rising rents in the past few years the City has received anecdotal evidence that some tenants experience pressures to relocate due to increased monthly rents. This requires additional data analysis, which will be included in the financial analysis that the Comprehensive Plan includes in the five year Community Work Program for 2018.
Location and type of affordable housing	High	See above. B.
<b>Disparities in Access to Opportunities</b>		
Availability of affordable units in range of sizes	High	<b>G.</b> While housing type and location is likely a contributing factor, data did not indicate great disparities in access. The City of Sandy Springs provides a number of affordable rental units - the Comprehensive Plan reports that the majority of renters in the City have monthly housing costs of \$800 to \$1,500 and approximately 7,600 units lease for cost less than \$800.

Contributing Factor	Priority	Discussion
<b>Disparities in Access to Opportunities</b>		
Availability of affordable units in range of sizes	High	<b>G. Cont'd</b> However there exist only limited range of units by size; contributing to this disparity was the prior Zoning Code inherited from Fulton County, which allowed only up to 5% of total units in multi-family developments to be 3-bedroom. 2016 data showed 1,553 3-bedroom units and 25 4-bedroom units. The City has approximately 22,000 rental units total. Although the City has a high median income, about one-fourth of all households earn less than \$35,000 annually.
Lack of private investment in specific neighborhoods	Medium	See above D.
Land Use and Zoning Laws	Low	See above C and G. The City aims to adopt new regulations in August 2017.
Location of proficient schools and school assignment policies	Medium	<b>H.</b> Mapping tools provided by HUD documenting a School Proficiency Index suggest that areas scoring only moderately well coincide with the integrated areas of the City and the areas scoring high on the index (80 or 90 out of 100 point index) coincide with white majorities (over 80%). Public school stakeholders reported concern about individual schools with high concentrations of one or more race or ethnic population(s) and voiced an interest in re-examining school district lines. Other stakeholders pointed out the large number of households preferring private schools over the locally available schools, thus creating an imbalance in public school population in terms of income, race and performance. Overlaying the Fulton County School District boundary map over population distribution by race shows that at least for two elementary school districts, boundary lines coincide with census blocks of high minority concentrations. The School District reported that this arises because district boundaries work to provide neighborhood schools, aimed to avoid lengthy trips for students.

Contributing Factor	Priority	Discussion
<b>Disparities in Access to Opportunities</b>		
The availability, type, frequency, and reliability of public transportation.	Medium	<b>I.</b> Even though the City benefits from a number of MARTA bus stops along major roads which provide access to public transit, bus routes in the City consist mainly in south and north bound connections. The only east and west bound connection offered is Route 148, operating only weekdays from 6 am to 7 pm. This may represent a challenge for individuals who often work 2 <sup>nd</sup> and 3 <sup>rd</sup> shifts and/or on the weekends. Further, mapping rents along Roswell Road shows that primarily moderate and high rental units located in close proximity to the primary route. The MARTA rail stations are on the east side of GA-400 and serve commuters from the perimeter north (North Springs Station) and the Perimeter business market (Sandy Springs and Medical Center stations).
<b>Disproportionate Housing Needs</b>		
Availability of affordable units in range of sizes	High	<b>J.</b> Analyzing the cost-burden status of City households, the AFH shows that around 6,000 households experience high cost burden conditions, where 50% or more of the household income is spent on housing (2013-2015 HUD data). Nearly 50% of Black and 60% of Hispanic households were likely to experience cost burden conditions and other housing problems, compared to 30% of the White population reporting these issues. About half of households with high cost burden were White and about one-third were Black.
<b>Disproportionate Housing Needs</b>		
Displacement of residents due to economic pressures.	High	See above A.
Lack of private investment in specific neighborhoods	High	See above D.

Contributing Factor	Priority	Discussion
<b>Publicly Supported Housing</b>		
Quality of affordable housing information programs	Low	<b>K.</b> Publicly supported housing is managed by the Fulton County Housing Authority and not by the City. The City provides support to the Community Assistance Center, a non-profit that provides information regarding housing availability and fair housing practices, among other services.
<b>Disability and Access</b>		
Lack of affordable, accessible housing in range of unit sizes.	High	<b>L.</b> People with disabilities often face challenges finding either for-sale or for-rent housing that is already accessible or that can be easily modified with features such as no-step entries, grab bars in bathroom or ramps. Additionally, availability of single-story homes is becoming more limited as pressures for infill tend to replace that stock with larger, often 2-story housing product. It adds a financial burden for people with disabilities to have to make structural improvements when seeking for-sale units, often limiting their housing options.
<b>Fair Housing Enforcement, Outreach Capacity, and Resources</b>		
Lack of local private fair housing outreach and enforcement	Medium	<b>M.</b> The City typically conducts an annual set of workshops to disseminate information on fair housing, in addition to information on the website and through Code Enforcement contact with property managers and those reporting housing problems. The Community Assistant Center also makes information available to those seeking their services. Local radio stations also provide public announcements regarding discrimination in renting practices and resources for learning about Fair Housing Law and legal assistance. The City now has a full-time planner dedicated to housing analysis, work program and communications, in addition to the work Code Enforcement officers conduct related to apartment sweeps and remedying housing maintenance problems.

**Fair Housing Goals** [Examples of goals developed by Staff for City Manager and Elected Officials to consider and add timeframe].

Fair Housing Goals	Contributing Factors Addressed	Fair Housing Issues	Metric, Milestones, and Timeframe for Achievement	Responsible Program Participant
<p><b>Launch Initiative to Implement the Next 10 Housing Work Program</b></p>	<p>Displacement of residents due to economic pressure.</p> <p>Location and type of affordable housing</p> <p>Access to financial services</p> <p>Housing accessibility modifications</p>	<p>Disparities in access to opportunity</p> <p>Disabilities and Access</p>	<p>In 2018 assign a dedicated Planner to prepare detailed work program to execute goals and tasks identified in the Next 10.</p>	<p>Community Development Department, Planning &amp; Zoning Division</p>
<p><b>Perform Housing Financial Analysis and Research, Identified in the Economic Development Chapter of the Next 10</b></p>	<p>Location and type of affordable housing</p> <p>Deteriorated and abandoned properties</p> <p>Lack of affordable, accessible housing in range of unit sizes.</p>	<p>Disproportionate Housing Needs</p> <p>Disparities in access to opportunity</p> <p>Disabilities and access</p>	<p>White paper detailing results of research and financial analysis, including potential for public-private-partnerships achieving the policy objectives defined in the Next 10.</p>	<p>Economic Development Department, with Planning &amp; Zoning staff assistance</p>
<p><b>Strengthen Partnerships with Agencies Providing Housing Information and Services</b></p>	<p>Location and type of affordable housing</p> <p>Access to financial services</p>	<p>Disproportionate Housing Needs</p> <p>Disparities in access to opportunity</p>	<p>Prepare and execute schedule of meetings and joint events with the Metro Atlanta Fair Housing, Inc, and the Georgia Commission on Equal Opportunity in partnership with Fulton County Schools and the Community Assistance Center.</p> <p>Communicate results and actions of the Regional Housing Task Force, as founding members of this new entity.</p> <p>Enhance existing city webpages with additional links and information to agencies</p>	<p>Planning &amp; Zoning Staff; Communications; Code Enforcement</p>

Fair Housing Goals	Contributing Factors Addressed	Fair Housing Issues	Metric, Milestones, and Timeframe for Achievement	Responsible Program Participant
<b>Expand Fair Housing Outreach, Education and Enforcement.</b>	<p>Location and type of affordable housing</p> <p>Availability of affordable units in range and sizes.</p> <p>Quality of affordable housing information programs.</p> <p>Lack of affordable, accessible housing in range and unit sizes</p> <p>Lack of local private fair housing, outreach, and enforcement</p>	<p>Disparities in access to opportunities</p> <p>Disproportionate housing needs</p> <p>Disability and access</p> <p>Fair housing enforcement, outreach capacity, and resources</p>	<p>Continue to conduct annual fair housing workshop, as done through 2015.</p> <p>Update the existing housing website that features information such as well as provide fair housing law information available in other languages and formats.</p> <p>Strengthen partnerships with the Community Assistance Center and other private and public housing agencies and owners to communicate fair housing protections and rights to residents.</p> <p>Create opportunities for multifamily complexes to receive training and information related to fair housing related to discrimination, property maintenance, and code violations.</p> <p>Create a list of organizations in the City and immediate region that provide services to people with disabilities to expand information to residents.</p>	<p>Community Development Department, CDBG Manager and Code Enforcement Division.</p>
<b>Delivery and Preservation of Affordable and Workforce Rental Housing</b>	<p>Land use and zoning laws</p> <p>Lack of private investments in specific neighborhoods</p> <p>The availability of affordable units in range and sizes</p> <p>Location and type of affordable housing</p>	<p>Disproportionate housing needs</p> <p>Disparities in access to opportunity</p>	<p>Monitor and report on the performance of new Development Code impact on new housing development.</p> <p>Through partnerships with public and private organizations encourage the preservation and affordability of housing for low-income households and encourage private investments in lower opportunity areas, as well as the renovations of existing housing units that are in poor conditions.</p>	<p>Community Development</p>
<b>Preserve Existing Affordable Homeownership</b>	<p>The availability of affordable units in range and sizes</p>	<p>Disproportionate housing needs</p> <p>Disparities in access to opportunity</p>	<p>Prepare analysis of naturally occurring affordable homes and work with CAC to support programs promoting home ownership and financial literacy programs.</p>	<p>Community Development</p>

### III. Community Participation Process

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**1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible.**

In conformance with the Citizen Participation Plan, the City held the required public hearings and meetings to solicit comments on community needs as part of the development of the AFH. Three community meetings were held in three different geographic locations and different times for easier community access. These meetings were advertised in three different newspapers, the City's official website, notices on the City Community Calendar, fliers circulated by stakeholders throughout an email distribution lists as well as fliers in English and Spanish distributed in public spaces such as the public library, public parks and small businesses (see Appendix A). Also, apartment complex property managers were contacted to assist in distributing notices. City Staff also conducted invitations during appearances at places of worship and popular commercial centers.

Two roundtables with service providers, school representatives and non-profit stakeholders were also conducted, as described in the subsequent section.

The three community meetings were as follows:

1- Southern Sandy Springs  
Church of Atonement, 4959 High Point Road  
Monday, April 3, 2017, 6:00 p.m. – 7:30 p.m.

2 - Northern Sandy Springs  
Community Assistance Center, 1130 Hightower Trail  
Wednesday, April 6, 2017, 6:00 p.m. – 7:30 p.m.

3- Central Sandy Springs  
Dorothy C. Bensons Senior Multipurpose Complex, 6500 Vernon Wood Drive  
Friday, April 21, 2017, 1:30 p.m. – 2:30 p.m.

The City held the following public hearings before Mayor and City Council:

1. Public Hearing and Program Update on Tuesday, June 6, 2017 at 6:00 p.m. (Sandy Springs City Hall). This hearing announced the preparation of the draft and the public review period.

2. Public Hearing and AFH Adoption on Tuesday, September 19, 2017, at 6:00 p.m. (Sandy Springs City Hall)

The draft was available for review and comment from July 20<sup>th</sup> through August 20<sup>th</sup>. Printed copies were placed at the Sandy Springs Regional Library, the Dorothy C. Benson Senior Multipurpose Complex, and Sandy Springs City Hall and on the City's website.

## **2. Provide a list of organizations consulted during the community participation process**

City staff reached out to several organizations and held **stakeholder meetings** on March 8, 2017 and May 23, 2017. Approximately 30 attendees shared their local knowledge on issues outlined in the AFH.

Key members of the following organizations were invited to participate:

- Fulton County Housing Authority
- Georgia Department of Community Affairs
- Metro Atlanta Fair Housing Services
- Fair Housing of Georgia Commission on Equal Opportunity
- Atlanta Regional Commission
- Sandy Springs Affordable Housing Partnership Inc.
- Latin American Association
- Department of Human Services
- The Mann House
- Community Assistance Center
- Drake House
- U Hope CDC
- Purpose Built Communities
- Every Women Works Inc.
- Mary Hall Freedom House,
- Housing Initiative of North Fulton, INC
- Families First
- Friends of North Springs High School Inc.
- Child Development Association
- Fulton County Schools
- Sharon Community Church

## **3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.**

Engagement efforts led to mixed results in participation levels. The meetings succeeded in engaging a diverse range populations in terms of income and race. The meeting held at the Benson Center was the most successful in terms of numbers; over 20 participants engaged in the event, generating insight to issues related to transportation and case histories of affordability issues related to fixed-

income, starter home availability and proximity to jobs. All attendees voiced concern about affordability.

Despite intensive outreach efforts to announce meetings, two meetings had low turn-out with only a handful of attendees. These two meetings were held in the evening, which likely contributed to low attendance. Staff assumed the church location would have been a draw, however that would have been more likely if the meeting were associated with worship related activity (before or after). Though low in number, these participants provided useful insight to issues related to aging condo-owned properties, concerns about schools, and apartment management practices related to increasing rents and poor interior conditions. Further, these participants provided important input on the issue of access to child-care and transportation.

**4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.**

The following is a summary of the comments received during the community participation process please refer to Appendix B for more detailed comments.

Stakeholders and residents felt like the demographic distribution shown on the HUD-provided maps tended to be accurate. Meeting attendees identified diverse neighborhoods in the City such as the Northwood area and Prado. One assumption as to why there were specific neighborhoods that had a majority of residents of a specific racial/ethnic group compared to other neighborhoods was associated with how people tend to live closer to others who share the same culture, language, and demographic characteristics. Others associated race distribution with age of housing and affordability. The older the apartment complex, the cheaper and the easier to afford for specific racial/ethnic populations of lower incomes.

In regards to housing, most participants asserted that the City offered limited housing options for the workforce population, those families with children seeking affordable, safe and high quality housing, and for the senior and fixed-income community. Participants who engaged in the meetings reported living in the city four or more years, some over twenty. Those who were renters all reported large increases in rents within the past two years. Two reported unsustainable rates such that they were currently seeking options to move. Some reported observing overcrowding, where units designed for one family were occupied by extended or multiple families.

Two common issues emerged relating services and infrastructure: child care services and transportation. Attendees reported no affordable childcare in the city. Transportation options add to the complexity of that issue. Participants reported that access to public transportation with schedules, routes and stops that served their work hours or locations did not serve their neighborhoods and if they did, they were not in reasonable proximity or used only if they were willing to spend several hours on the trip.

Others suggested that witnessing older apartment complexes with less expensive rents being torn down and replaced by luxury apartments was a cause for concern. Two participants came to one of the meetings specifically for that reason.

The elderly is another population group that has been affected by the housing price increase. Some people suggested that new development should be friendly for the senior community providing the necessary accommodations. For example, building more ranch homes instead of 3-story houses. Also, others commented that the special needs population does not have easy access to affordable handicap housing in the City, and that many landlords did not provide the necessary accommodations, such as handicapped parking.

Others suggested that zoning should be in place requiring developers to set aside a percentage of units for housing that is affordable for working families, which the City is currently working on drafting. Others suggested that if the City, in fact, puts in place an affordable housing policy, the City needs to make sure that that information is available and easy to access to inform those who are interested.

In terms of transportation, many said that public transportation was limited after regular hours for those who worked two or three shifts, especially east and west routes. Attendees recommended the City should work with neighboring jurisdictions such as Brookhaven, Dunwoody, Roswell, and Cobb County to provide better transportation efficiency. Others commented that some bus stops do not provide shelter nor benches, discouraging greater usage of public transportation. Many associated transportation with schools. There are schools that do not provide sidewalks for children to be able to walk to schools. Participants reported that some public education facilities do not provide bus rides during summer school, and they asserted many children cannot attend summer school due to lack of easy and safe transportation options for especially smaller children who needed an adult to meet them at a common drop and escort them to their homes.

In terms of education access, participants enjoy living in the City of Sandy Springs due to quality schools. However, participants from the school system raised concerns about the ways high housing costs impacted student turn-over, given that many members of the population leave the city for more affordable locations. They also shared concerns about staff turn-over, reporting that many teachers preferred to be transferred to schools closer to housing affordable to teacher-level salaries; they reported long commute times as unsustainable and resulting in high teacher turn-over. The AFH study does not collect data related to this issue and cannot provide information to verify the extent of this problem.

Others suggested that childcare in the City was expensive and created financial burden on families with limited income. This was verified by the Community Assistance Center which does research these facilities on behalf of clients.

In terms of employment, meeting attendees generally said that they had good access to jobs. Others said that they are contemplating on moving somewhere else because their income remains the same while housing costs increase. Many addressed the benefit of how City growth and new investment continues to generate more job opportunities; these comments often were accompanied with the desire for greater affordability of housing near those new jobs.

## IV. Assessment of Past Goals, Actions and Strategies

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- a. Discuss what progress has been made toward their achievement.
- b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).
- c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.
- d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The last Assessment of Impediments to Fair Housing was conducted in 2015. That document included the following issues and goals:

1. Potential of New Residents to be Aware of Fair Housing Laws.

While an historic Act in the history of civil rights legislation, Fair Housing law has been in place for over 40 years, and most citizens have only a general familiarity with the law, the protections it affords and how to file a fair housing complaint if they feel they have experienced discrimination. Over the past decade the Sandy Springs minority population has grown considerably with the greatest increase seen in Hispanic/Latino residents. It would be safe to assume that all minority groups, especially those with potential language barriers, may be less informed concerning their rights under fair housing laws.

2. Lack of Available Land for New Development/Increased Redevelopment of Older, More Affordable Housing Stock with New, More Expensive Units.

Even though Sandy Springs has seen the redevelopment of three older apartment complexes, Avistele at Andalusia with approximately 300 units, the Versailles apartment complex with a total units of 264 and Chastain Apartments with 172 units. These apartments have been replaced for newer mixed-use developments and high-end apartment complexes. However, there still remains a significant stock of affordable apartment units within the City. The City will need to continue to monitor the availability of affordable units and ensure that redevelopment does not deplete the City's affordable housing stock.

3. Historical Disparities in Lending Across Racial and Ethnic Categories

As part of HMDA data reporting, the reasons for loan denials must be included. For the Atlanta-Sandy Springs-Marietta MSA, debt-to-income ratio, employment history and credit history were the three most common reasons cited for non-conventional loan denials. Denial rates were the highest primarily for minority borrowers due to debt-to-income ratios and credit history. This data would support that minorities are more likely to be denied loans for reasons other than discrimination, but for reason tied to disparities related to race and ethnicity.

The following are the goals and strategies set in the previous Analysis of Impediments:

1. Continue to establish a fair housing information site using the Community Development Block Grant Program webpage. Make fair housing law, how to file a complaint and other information available on the website. References for locating Georgia Landlord/Tenant information could also be included.
2. Highlight fair housing activities in Sandy Springs during National Fair Housing month every April. Atlanta Metro Fair Housing has expressed an interest in partnering with Sandy Springs on possible future outreach events. April is designated National Fair Housing Month each year by HUD.
3. Preserve partnerships with Sandy Springs Community Action Center (CAC) and Holy Spirit Catholic Church to ensure fair housing information is available for Hispanic/Latino residents. Consider partnerships with other nonprofit and faith-based organizations that serve minority residents in Sandy Springs to promote fair housing.
4. As part of annual apartment certification requirements provide information to landlords on fair housing. Evaluate how to best incorporate this with the apartment inspection ordinance and enforcement procedures.
5. Maintain a fair housing outreach program for residents of Sandy Springs' rental properties to include basic information on Fair Housing laws and agencies that are available for support if residents suspect they have experienced housing discrimination. Consider partnerships with the Atlanta Board of Realtors, the Apartment Council and other similar organizations.
6. Continue to explore partnerships with Consumer Credit Counseling Service (CCCS) or other financial counseling agencies for outreach opportunities to Sandy Springs minority residents since poor credit histories and other financial management issues have the greatest impact on minority loan denial rates according to HMDA data for the Atlanta-Sandy Springs-Marietta MSA.
7. Capitalize on opportunities to incentivize the inclusion of affordable, mixed-income housing in future redevelopment projects.
8. Complete an accessibility survey of available rental housing accessible to persons with disabilities in Sandy Springs to ensure compliance with fair housing law. Coordinate this recommendation with Sandy Springs ADA Coordinator.

Since the 2015 Assessment, the City has worked to meet the goals outlined above. The following and efforts have been conducted:

- Two fair housing workshops were conducted in 2015.
- The Fair Housing Webpage was continually updated with the latest housing information and resources.
- The Apartment Sweeps program continues, with two - three sweeps per month executed.
- The City provided and continues to provide financial support to the Community Assistance Center, whose mission is to prevent homelessness and hunger through a variety of services.

- Undertook an intensive, community-driven planning process to prepare “The Next 10” the Comprehensive Plan which provides promotes workforce housing in the City.
- Prepared an apartment inventory to capture units by type and average rent.
- Conducted a market study and workforce housing study in the City as part of The Next 10.
- Staff receives two to three trainings annually related to fair housing and affordable housing.

## V. Fair Housing Analysis

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### A. Demographic Summary

#### 1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

According to the US Census Data, the population of Sandy Springs has increased since the City’s incorporation in 2005, from 97,898 in 2006 to 105,347 in 2015. Sandy Springs has seen the same shifts in racial and ethnic composition as the rest of the Atlanta Region over the past decade – the population has become more diverse and is trending toward a majority minority. In Sandy Springs White population numbers have decreased from 60,023 since 1990 to 52,790 in 2015. Conversely, Black, Hispanic and Asian populations have increased substantially over time. In 1990 Blacks numbered 5,472 and by 2015, this number grew to 17,839. Hispanics grew in population from 1,976 in 1990 to 12,256 in 2015. Asian and Native American, which constitute to small percentages of the entire population but grew at faster rates, from 1,087 and 58, respectively in 1990 to 4,622 and 152, respectively by 2010.

Additionally, the number of residents with foreign national origin have continued to increase in the City of Sandy Springs over recent decades: in 1990, 4,643 foreign-born residents lived in the City and this number nearly quadrupled by 2015 to 18,689. Topping the list of countries of origin are Mexico, India, and Brazil.

As a region, age cohorts follow national trends whereby we are getting both older – a greater percent of the population is over 65 than historically experienced – and younger, with those between 18 and 35 comprising a greater percent of the whole than in the past. These two cohorts will drive trends in housing market demand.

The region has also experienced an even more rapid trend toward diversity than the City. The region went from being 71% White in 1990 to be 51% White in 2015, and several counties are now majority minority. Black populations grew from comprising 25% of the region in 1990 to 32% in 2015. Hispanics experienced a substantial growth from constituting under 1% of the population in 1990 to 10% in 2015. Foreign-born population increased as well from 4% to 14% by 2010 with Mexico, India and Korea being the most common countries of origin at the regional level. The region forecasts show that by 2040 around 20% of the population will be aged 60 and older.

The following section reports demographic and population data per HUD-provided data, also available in subsequent sections in Tables 1, 2, 3 and HUD Maps 1, 2, 3.

## Race/Ethnicity

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### **Area Now Incorporated as Sandy Springs –1990-2000:**

- There was an increase of White residents from 60,023 to 62,783, an increase of 2,760 (5%).
- Blacks experienced a population increase from 5,027 to 10,499, an increase of 5,472 (108 %)
- The Hispanic population also increased from 1,976 to 8,260, an increase of 6,284 (318%)
- Asian-Pacific Islanders population increased from 1,087 to 3,139, an increase of (188%)
- Native American residents increased from 58 to 189, an increase of 131 residents or (225%)

### **City of Sandy Springs – 2000-2010:**

- The City of Sandy Springs, incorporated in 2005 as a new municipality in northern area of Fulton County.
- The White population was the only racial and ethnic groups that experienced a decrease in population.
- The White population decreased from 62,738 to 55,256, a decrease of 7,482 (12%)
- All other racial and ethnic groups experienced a certain degree of population increase in the City of Sandy Springs.
- Black population continued to grow from 10,499 to 19,005, which is an increase of 8,506 (81%)
- The Hispanic population is another group that experienced growth from 8,260 to 13,080, an increase of 4,820 (58%)
- Native American population increased from 189 to 306, an increase of 117 (62%)
- Asian-Pacific Islander populations also increased from 3,139 to 5,297, an increase of 2,158 (68%)

### **City of Sandy Springs –2010 – 2015:**

- White population decreased from 55,256 to 52,790, a decrease of 1,466 (-4%)
- Black or African American population percentage decreased from 19,005 to 17,839, which represents a decrease of 1,166 (-6%)
- Native American population decreased from 306 to 151, a decrease of 152 (-50%).
- Asian-Pacific Islander population decreased from 5,297 to 4,622, a decrease of 675 (-18%).

- Hispanic population decreased from 13,080 to 12,256, which is a decrease of 824 (-6%).

**Atlanta-Sandy Springs- Roswell, GA CBSA Region –1990-2000:**

- White population increased in the region from 2,190,381 to 2,575,783, which is an increase of 385,402 (18%).
- Black population increased 774,022 to 1,234,307, an increase of 460,285 or (60%)
- The Hispanic population also increased from 5,236 to 17,724, an increase of 12,488 (238%).
- Asian/Pacific Islander population increased from 50,607 to 148,647, which is an increase of 98,040 (193%)
- Native American population also increased from 58,434 to 270,338<sup>1</sup>, an increase of 211,904 (363%).

**Atlanta-Sandy Springs- Roswell, GA CBSA Region – 2000-2010:**

- White population continued to increase from 2,575,783 to 2,684,570, an increase of 108,787 (4%)
- Black population increased from 1,234,307 to 1,737,348, an increase of 503,041 or (41%)
- Hispanic population increased from 17,724 to 547,894, an increase of 530,170 or (299% )
- Asian-Pacific Islander increased from 148,647 to 278,025, an increase of 129,378 or (87% .)
- Native American population decreased from 270,338 to 23,199, a decrease of 247,139 or (91%)

**Atlanta-Sandy Springs- Roswell, GA CBSA Region –2010-2015:**

- The White population stayed the same at 2, 684, 570
- The Black population decreased from 1,737,348 to 1,684,178, a decrease of 53,170 or 3%
- This Hispanic population did not change and stayed the same at 547,894
- Asian-Pacific Islander decreased from 278,025 to 254,691, a decrease of 23,334 or 8%
- Native American population decreased from 23,199 to 10,779, a decrease of 12,420 or 55%

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<sup>1</sup> This number appears unusually high; the AFH does accurately report the number as published by HUD. It may be accounted for by Census category types changing. Subsequent census years seem to correct for this unusually high number, as observed by 2010 total population of 23,199 which follows more logically from earlier decade trends.

## National Origin

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### City of Sandy Springs

- From 1990 to 2000, the number of foreign born residents increased from 4,643 to 14,763, which is an increase of 10,120 (217%)
- From 2000 to 2010, the foreign born population increased from 14,734 to 18,821, an increment of 4,087 or 28 %
- From 2010 to 2015, the foreign-born population increased from 18,821 to 18,689, an increment of 132 or 0.7%
- The top three countries of origin for foreign born residents in the jurisdiction are:
  - Mexico 5,101
  - India 2,119
  - Brazil 1,210

### Atlanta-Sandy Springs- Roswell, GA CBSA Region

- From 1990 to 2000, the foreign-born population increased from 117,366 to 424,683. (307,317 or 261%)
- From 2000 to 2010, the foreign-born population continued to increase from 424,683 to 689,787, an addition of 265,104 or 62% increase
- From 2010 to 2015, the foreign-born population continued to increase from 689,787 to 720,964, an increase of 31,177 or 5%
- The top three countries of origin for foreign-born residents in the region are:
  - Mexico 174,014
  - India 50,770
  - Korea 34,848

## Age

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### City of Sandy Springs –1990-2000

- The population under 18 increased slightly between the years 1990 and 2000. There was an increase from 12,339 to 15,551, which is an increment of 3,212 or 26%
- There was an increase in the size of the 18-64 cohort from 48,401 to 61,541, which is an increase of 13,140 or 27%
- For the age group of 65+, the population grew from 5,652 to 8,444, an increase of 2,792 or 49%

### **City of Sandy Springs – 2000-2010**

- The population under 18 increased from 15,551 to 18,851, a change of 3,300 people or 21%
- The age group 18-64 showed a small decrease from 61,541 to 61,499, a decrease of 42 or 0.07%
- For those 65+, the population increased from 8,444 to 9,729, an increase of 1,285 or 15%

### **City of Sandy Springs – 2010 – 2015**

- The population under 18 grew from 18,851 to 24,053, an increment of 5,202 (27.6%)
- The age group of 18- 64 grew from 61,499 to 78,427, which constitute an increase of 16,928 or 28%
- The number of those 65 and older increased from 9,729 to 12,405, a difference of 2,676 or 27.51%

### **Atlanta-Sandy Springs- Roswell, GA CBSA Region – 1990-2000**

- The population under 18 increased from 803,108 to 1,163,223, an increase of 360,115 or 45%
- The age group between ages 16-64 increased from 2,025,561 to 2,770,277, this is an increase of 744,716 or 36%
- The population 65+ has increased from 251,559 to 329,945, an increase of 78,386 or 31%

### **Atlanta-Sandy Springs- Roswell, GA CBSA Region – 2000-2010**

- The population under 18 increased from 1,163,223 to 1,400,791, an increase of 237,568 or 20%
- The population group from 16-64 from 2,770,277 to 3,411,410, an increase of 641,133 or 23%
- The age group of 65 and over increased from 329,945 to 474,527, an increase of 144,582 or 43%

## Limited English Proficiency (LEP)

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### City of Sandy Springs

- From 1990 to 2000, LEP populations experienced an increase by 5,962 (313%) going from 1,909 to 7,834.
- From 2000 to 2010, LEP populations increased from 7,834 to 9,254, an increase of 1,415 or 18 %.
- From 2010 to 2015 increased from 9,254 to 9,633 an increased of 409 or 4%
- The three main languages spoken by people with limited English proficiency.
  - Spanish 6,041
  - Portuguese 756
  - African 437

### Atlanta-Sandy Springs-Roswell, GA CBSA Region

- From 1990 to 2000, LEP populations increased from 64,104 to 259,330, an increase of 195,226 (304%)
- From 2000 to 2010, there was an increase of 259,330 to 365,963. This constitutes an increase of 106,633 (41%)
- The foreign-born population increased by 6,625 or 1.81% going from 365,963 in 2010 to 375,588 in 2015.
- The three main languages spoken by people with limited English proficiency.
  - Spanish 224,781
  - Korean 21,996
  - Vietnamese 21,665

## Gender

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### City of Sandy Springs-Demographic Trends - Gender

- The total male population increased from 32,254 to 42,006 from 1990 to 2000, an increase of 9,752 (30%)
- From 2000 to 2010, the Male population increased from 42,006 to 43,308, an increase of 1,302 (3%)
- From 2010 to 2015, the male population increased from 43,308 to 47,490
- From 1990 to 2000, the total female population increased by 7,383 (20%) from 36,147 to 43,530.
- From 2000 to 2010, the female population appears to increased from 43,530 to 46,771 by 3,241 (8%)
- From 2010 to 2015, the female population increased from 46,771 to 53,201

### **Atlanta-Sandy Springs-Roswell, GA CBSA Region – Demographic Trends- Gender**

- The male population increased by 603,129 (40%) from 1,498,953 in 1990 to 2,102,082 in 2000.
- From 2000 to 2010, the male population increased from 2,102,082 to 2,572,523, which is an increase of 470,441 (22%)
- The female population increased from 1,183,361 to 2,161,363, this is an increase of 978,002 (82%) for the period of 1990 to 2000
- From 2000 to 2010, the female population increased from 2,161,363 to 2,714,205, an increase of 552,842 (25%)

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**Table 1 – Demographics City and Region in 2010**

	(Sandy Springs City, GA CDBG) Jurisdiction		(Atlanta-Sandy Springs-Roswell, GA) Region			
Race/Ethnicity	#	%	#	%		
White, Non-Hispanic	52790	58.6	2684570	50.78		
Black, Non-Hispanic	17839	19.8	1684178	31.86		
Hispanic	12256	13.61	547894	10.36		
Asian or Pacific Islander, Non-Hispanic	4622	5.13	254691	4.82		
Native American, Non-Hispanic	151	0.17	10779	0.2		
Two or More Races, Non-Hispanic	1759	1.95	90866	1.72		
Other, Non-Hispanic	662	0.73	13749	0.26		
<b>National Origin</b>						
#1 country of origin	Mexico	5101	5.64	Mexico	174014	3.48
#2 country of origin	India	2119	2.34	India	50770	1.02
#3 country of origin	Brazil	1210	1.34	Korea	34848	0.7
#4 country of origin	El Salvador	620	0.69	Jamaica	34108	0.68
#5 country of origin	Colombia	568	0.63	Vietnam	28037	0.56
#6 country of origin	China excl. Hong Kong & Taiwan	444	0.49	China excl. Hong Kong & Taiwan	21114	0.42
#7 country of origin	Canada	399	0.44	El Salvador	19166	0.38
#8 country of origin	Iran	323	0.36	Guatemala	18337	0.37
#9 country of origin	Haiti	315	0.35	Colombia	16109	0.32
#10 country of origin	Vietnam	311	0.34	Nigeria	15061	0.3
<b>Language</b>						
#1 LEP Language	Spanish	6,041	6.68%	Spanish	224,781	4.49%
#2 LEP Language	Portuguese	756	0.84%	Korean	21,996	0.44%
#3 LEP Language	African	437	0.48%	Vietnamese	21,665	0.43%
#4 LEP Language	French	381	0.42%	Chinese	17,726	0.35%
#5 LEP Language	Arabic	238	0.26%	African	11,988	0.24%
#6 LEP Language	Other Asian Language	224	0.25%	Other Indic Language	6,935	0.14%
#7 LEP Language	Chinese	195	0.22%	Other Asian Language	6,903	0.14%
#8 LEP Language	Other Indo-European Language	162	0.18%	French	6,038	0.12%
#9 LEP Language	Russian	160	0.18%	French Creole	5,082	0.10%
#10 LEP Language	Persian	158	0.17%	Russian	5,051	0.10%
<b>Disability Type</b>						
Hearing difficulty		1,855	2.06%		124,237	2.51%
Vision difficulty		1,214	1.35%		96,741	1.95%
Cognitive difficulty		2,309	2.56%		195,085	3.94%
Ambulatory difficulty		3,319	3.69%		273,305	5.52%
Self-care difficulty		1,690	1.88%		101,952	2.06%
Independent living difficulty		2,743	3.05%		185,645	3.75%
<b>Sex</b>						
Male		43,308	48.08%		2,572,523	48.66%
Female		46,771	51.92%		2,714,205	51.34%
<b>Age</b>						
Under 18		18,851	20.93%		1,400,791	26.50%
18-64		61,499	68.27%		3,411,410	64.53%
65+		9,729	10.80%		474,527	8.98%
<b>Family Type</b>						
Families with children		9,927	45.95%		662,976	49.99%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.  
 Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Decennial Census, 2010.

**Table 2 – Demographics Trends by Decade, 1990- 2010 in City and Region**

Race/Ethnicity	(Sandy Springs City, GA CDBG) Jurisdiction								(Atlanta-Sandy Springs-Roswell, GA) Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	60,023	87.92%	62,738	73.34%	55,256	58.95%	52,790	58.60%	2,190,381	71.05%	2,575,783	60.41%	2,684,571	50.78%	2,684,570	50.78%
Black, Non-Hispanic	5,027	7.36%	10,499	12.27%	19,005	20.28%	17,839	19.80%	774,022	25.11%	1,234,307	28.95%	1,737,348	32.86%	1,684,178	31.86%
Hispanic	1,976	2.89%	8,260	9.66%	13,080	13.96%	12,256	13.61%	5,236	0.17%	17,724	0.42%	547,894	10.36%	547,894	10.36%
Asian or Pacific Islander, Non-Hispanic	1,087	1.59%	3,139	3.67%	5,297	5.65%	4,622	5.13%	50,607	1.64%	148,647	3.49%	278,025	5.26%	254,691	4.82%
Native American, Non-Hispanic	58	0.08%	189	0.22%	306	0.33%	151	0.17%	58,434	1.90%	270,338	6.34%	23,199	0.44%	10,779	0.20%
<b>National Origin</b>																
Foreign-born	4,647	6.78%	14,734	17.21%	18,821	20.05%	18,689	19.91%	117,366	3.81%	424,683	9.96%	689,787	13.05%	720,964	13.64%
<b>LEP</b>																
Limited English Proficiency	1,903	2.78%	7,839	9.16%	9,254	9.86%	9,663	10.30%	64,104	2.08%	259,330	6.08%	365,963	6.92%	372,588	7.05%
<b>Sex</b>																
Male	32,254	47.15%	42,006	49.11%	43,308	48.08%	43,308	48.08%	1,498,953	48.63%	2,102,082	49.30%	2,572,523	48.66%	2,572,523	48.66%
Female	36,147	52.85%	43,530	50.89%	46,771	51.92%	46,771	51.92%	1,583,361	51.37%	2,161,363	50.70%	2,714,205	51.34%	2,714,205	51.34%
<b>Age</b>																
Under 18	12,339	18.59%	15,551	18.18%	18,851	20.93%	18,851	20.93%	803,108	26.07%	1,163,223	27.28%	1,400,791	26.50%	1,400,791	26.50%
18-64	48,401	72.90%	61,541	71.95%	61,499	68.27%	61,499	68.27%	2,025,561	65.76%	2,770,277	64.98%	3,411,410	64.53%	3,411,410	64.53%
65+	5,652	8.51%	8,444	9.87%	9,729	10.80%	9,729	10.80%	251,559	8.17%	329,945	7.74%	474,527	8.98%	474,527	8.98%
<b>Family Type</b>																
Families with children	7,056	40.57%	5,435	42.40%	9,927	45.95%	9,927	45.95%	415,234	50.79%	363,160	50.87%	662,976	49.99%	662,976	49.99%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

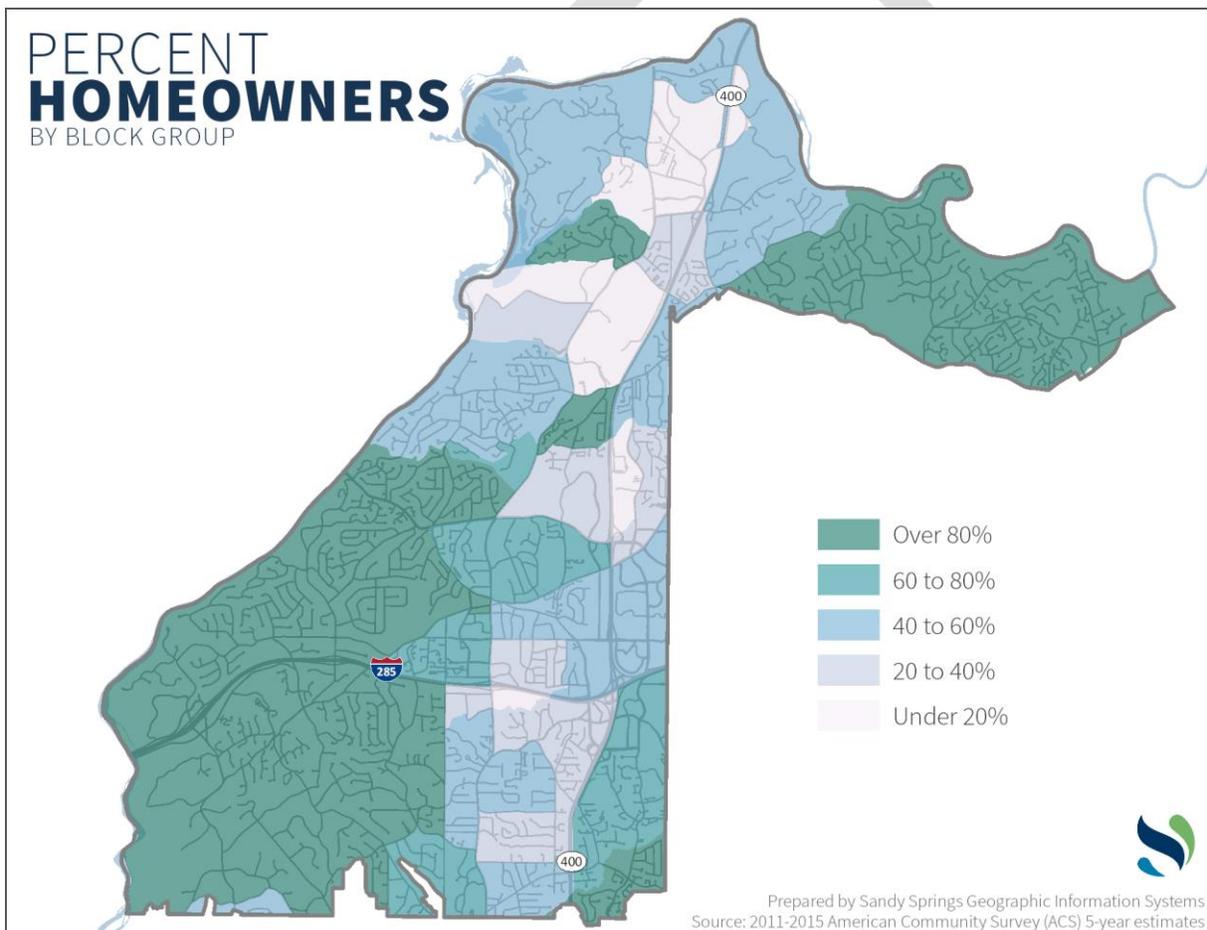
Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Decennial Census, 1990, 2000; American Community Survey (ACS) 2009-2013.

**2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time**

In recent years, some of the older for-rent apartments have been redeveloped with mixed-use buildings and stand-alone apartment buildings and townhouses. Of all the multi-family unit complexes, 60% were built before 1980. Near City Springs, where the new City Hall is under construction, the number of multifamily residential units is rapidly increasing. The City is almost built-out, with very little green-field land available for large subdivision development. It is expected that most of the future population growth will be accommodated by redevelopment, infill, and developments of higher density. According to permit data, the market has delivered approximately 3,154 new single-family residential units since 2005.

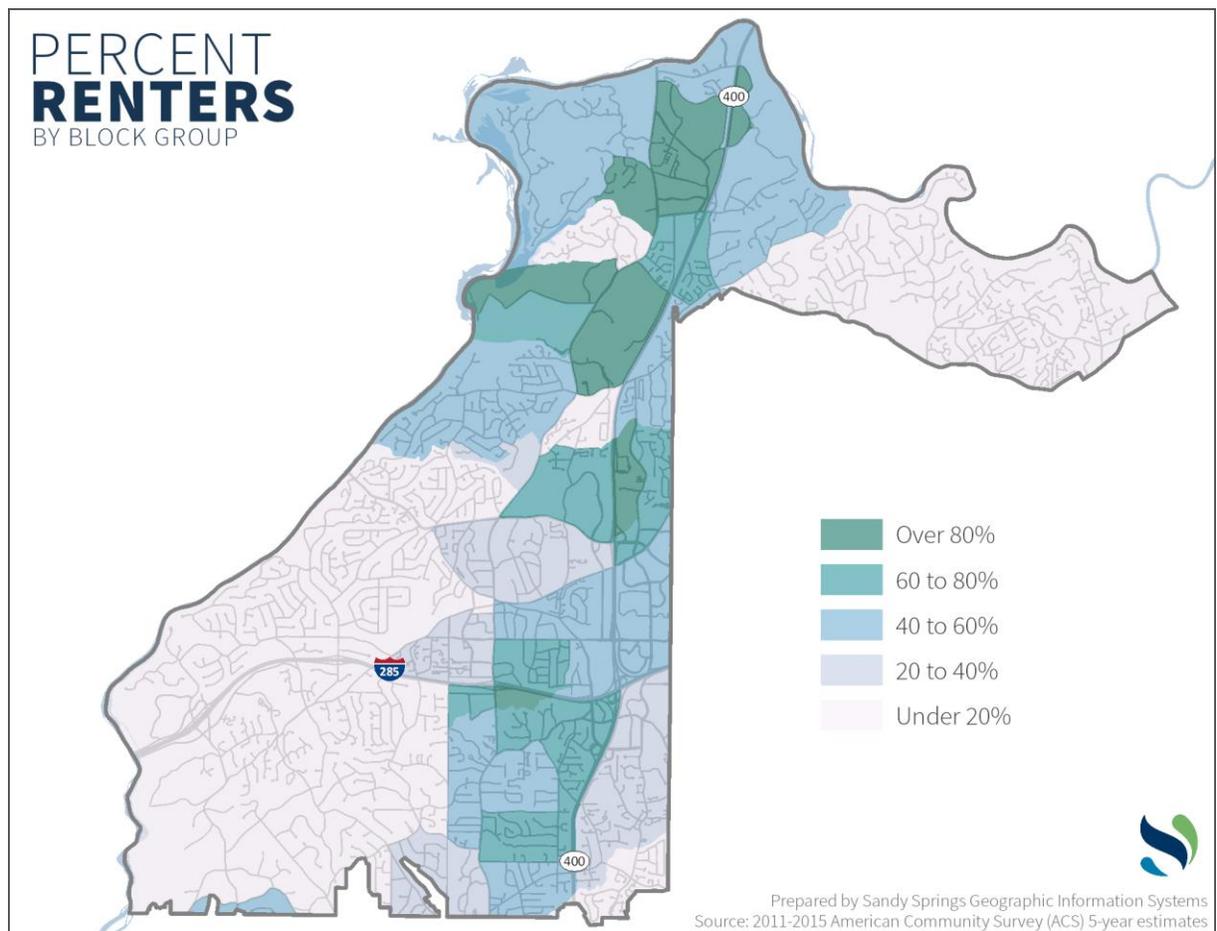
**Figure 1: Percentage of Homeowners by Census Block Group in the City of Sandy Springs<sup>2</sup>**



Source: American Community Survey 5-Year Estimates, 2011-2015.

The Percent Homeowner Map (2011-2015) in Figure 1 shows that homeownership is concentrated in the northern area known as “the Panhandle” and in the Southwest area of the City, with 80% or greater homeownership trends. In the remaining northern area, between 40-60% of households are homeowners. The Southeast portion of the City similarly shows patterns where around half of all households are homeowners (40-60%).

**Figure 2: Percentage of Renters by Census Block Group in the City of Sandy Springs<sup>3</sup>**



Source: American Community Survey 5-Year Estimates, 2011-2015.

Figure 2 illustrates how renter households concentrate most heavily and predictably along the major corridors of I-285, GA-400 and Roswell Road (State Route 9). In the northern section of latter two - Roswell Road, and GA-400 - the percent of renter households range between 40% and 80%. The central and southeastern areas of the City, at the I-285 perimeter and GA-400 interchange, demonstrate more mixed, renter to homeowner characteristic, varying between 20-80% of rental housing.

According to the 2011-2015 American Community Survey shown in Tables 3 and 4, housing construction in large volume began during the 1970s and the pace remained high through the 1990s. With the Great Recession, construction of all types slowed sharply. Table 3 shows the total housing units built across the decades, however the data provided does not differentiate rental units versus owner housing units.

**Table 3: Year of Dwelling Construction in Sandy Springs from 1949 until 2010.**

Year Structure Built	Total Housing Units Added
2010 or later	6,213
1990 to 2009	12,549
1970 to 1989	25,179
1950 to 1969	8,452
1949 or earlier	678

Source: American Community Survey (ACS) 2011-2015.

**Table 4: Type of Dwelling Unit Occupancy in Sandy Springs: 2010 and 2015**

	2010	2015
Renter-Occupied Units	19,756	23,002
Owner Occupied Units	20,858	20,056

Source: American Community Survey (ACS) 2011-2015.

Historically, construction of the majority of the apartment (rental) units developed along the Roswell Road corridor, primarily between 1960s and mid-1980s under the governance of Fulton County. Many of these apartment complexes are now aging and constitute the most affordable rental housing in the City.

The number of available multi-family units increased in the City between 2008 and 2017. Building permit data shows approximately 5,500 new multi-family units delivered through mixed-use and stand-alone residential projects. Additionally, there has been around 1,500 new single-family residential units from 2009 to 2017. A total of 3,154 Certificates of Occupancy have been issued for new single-family home construction from 2005 to 2016.

## B. General Issues

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### 1. Analysis Segregation/Integration

**a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.**

HUD requires that the AFH include an analysis to assess levels of segregation in the jurisdiction. To assist in this analysis, HUD generated a Dissimilarity Index, which measures the degree to which two groups are evenly distributed across a geographic area. Table 5.a and 5.b below report the results of this analysis, drawing from HUD's AFFH Data & Mapping Tool for the City of Sandy Springs and the Atlanta-Sandy Springs-Roswell, GA CBSA Region.

Values range from 0 to 100, with a **value of zero representing perfect integration** between racial groups, where a value of 100 representing perfect segregation between racial groups. Dissimilarity index values between 0 and 39 indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate high level of segregation.

Overall, the City of Sandy Springs reflects **low or moderate levels of segregation**. Table 5.a. shows that during the 1990s and 2000s, most racial/ethnic groups experienced low levels of segregation with scores of 39 and lower, except for the Hispanic population, which experienced moderate levels of segregation in 2000. In 2010, the Dissimilarity Index slightly increased from low to moderate levels of segregation across most racial/ethnic groups, when scores reached above 40, except for Asian/Pacific Islanders which was the only group demonstrating low levels of segregation.

**Table 5.a: Racial/Ethnic Dissimilarity Index in the City of Sandy Springs in 1990, 2000, and 2010**

Race/Ethnicity	1990	2000	2010
White	28.02	32.14	44.05
Black	33.24	37.63	47.90
Hispanic	34.99	43.19	51.83
Asian or Pacific Islander	13.61	24.12	33.93

Source: Decennial Census 2010; Brown Longitudinal Tract Data Base (LTDB) based on decennial census data, 2010, 2000 & 1990.

Regionally, the geography of race appears somewhat more pronounced historically, with an Index value between 50 – 68 all groups since the 1990 census (Table 5.b). While Black populations have experienced the highest level of segregation levels across all groups, with **scores in the 60's**, both Black and White populations experienced an increase in integration, shown by **scores dropping slightly** between 2000 and 2010 (Table 5.b). Between 1990 and

2010, however, Hispanic and Asian and Pacific Islander groups demonstrated increased Dissimilarity Index values from low levels in 1990, to moderate levels in 2010, scoring 53 and 51, respectively.

**Table 5.b: Racial/Ethnic Dissimilarity Index in Atlanta-Sandy Springs-Roswell GA CBSA Region in 1990, 2000, 2010**

Race/Ethnicity	1990	2000	2010
White	59.99	56.14	53.82
Black	66.06	63.75	61.43
Hispanic	35.48	51.62	52.62
Asian or Pacific Islander	42.92	45.51	51.37

Source: Decennial Census 2010; Brown Longitudinal Tract Data Base (LTDB) based on decennial census data, 2010, 2000 & 1990.

**b. Identify areas in the jurisdiction and region with relatively high segregation and integration by Race/Ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area**

Mapping Census data by Race and Ethnicity from 1990 through 2010 yield the following observations regarding concentrations of populations by race (Figures 3, 4 and 5):

**Segregated Trends Areas North:**

- Maps show the northeast Panhandle area consistently characterized by predominately White populations, with percentages over 80% in the area.
- Census Tract 010122, Perimeter Center, appears to be a more integrated area, with a slight majority of Asian population (51% ), 31% White , 13% Black and 4% Hispanic.
- Census Tract 010120, located at the northern border of the Chattahoochee River, also indicates a fairly integrated areas, where 52% of the population is White, 33% Black, 10% Hispanic, and 3% Asian. The composition of this Tract is the closest to that of the entire City.
- Census Tract 010121, surrounding the Abernathy Square Shopping Center area, suggests higher segregation of White residents (84%) and smaller percentages of Black (7%), Hispanic (3%) and Asian (5%) populations.
- Census Tract 010210, in the North Springs Center area, tends to be moderately segregated area where 68% of the residents are White.
- Census Tract 010208 where the Cherokee Country Club is located trends to a concentrated White populated area (70%).
- Census Tract Code 010208 where The Point at Canyon Ridge and Veridin Apartment homes are located has a slight majority of Black residents (55%).

### **Segregated Trends Areas South:**

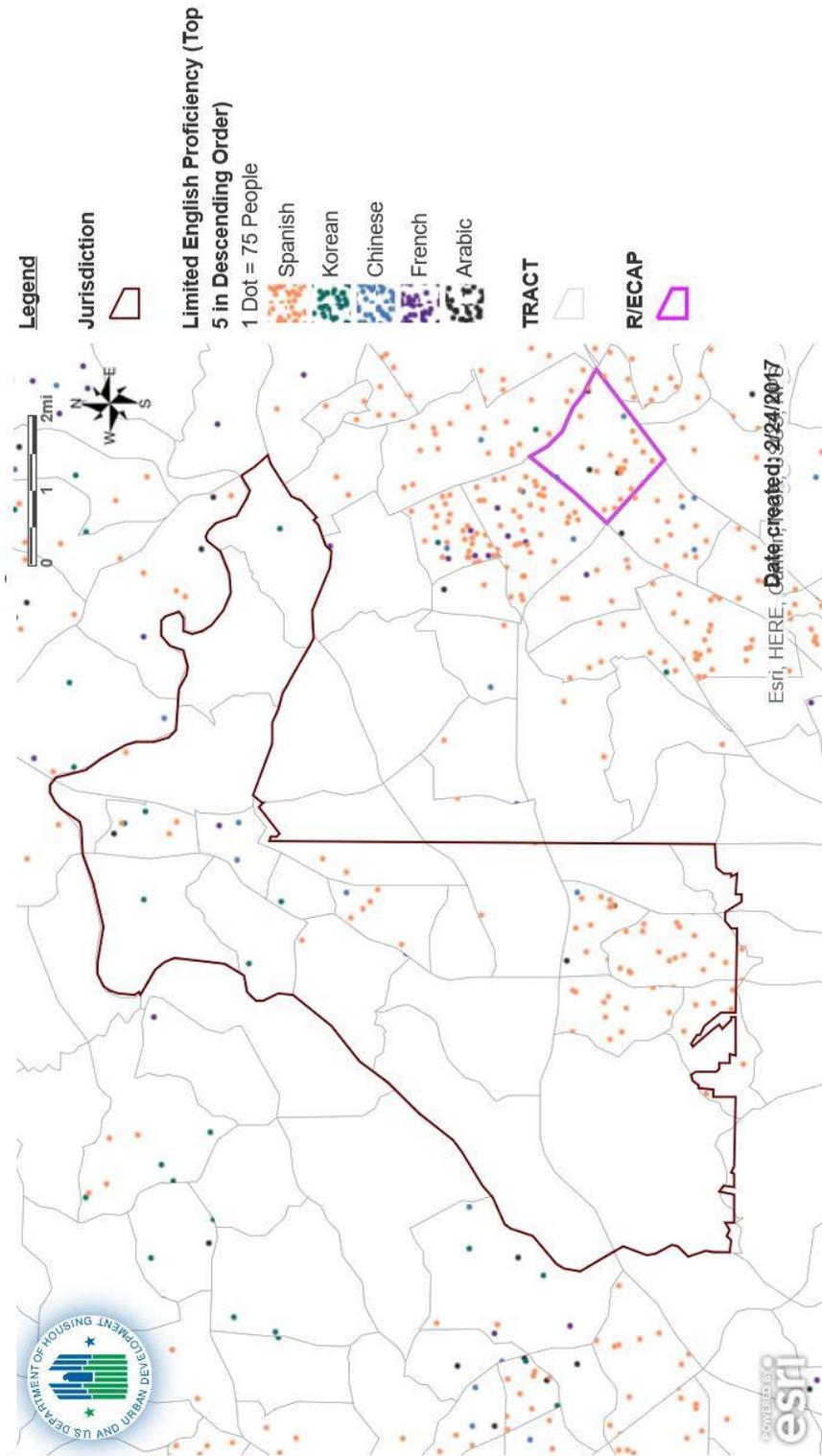
- The southwest area between the Chattahoochee River, the Atlanta City limit, Lake Forest Drive, and Johnson Ferry Road is characterized by high concentration of White population.
- Census Tract 010204, 010205, 010206, which is the Southeast portion of the City also is predominantly White (89%).
- Census Tract 010113, surrounding the Perimeter Circle apartments reflects a predominantly Hispanic population (57%), 28% Black, 13% White, and 3% Asian.
- Census Tract 010114, which is the area surrounding the Highpoint Elementary School having percentages over 55% of White residents.
- Census Tract 010212, surrounding the Fountain Oaks Shopping Center area suggests a concentration of Hispanic populations (80%), with the remaining comprised of 14% White, 5% Black, and 5% Asian.
- Census Tract 010211, which is the area surrounding the Holy Spirit Preparatory School, trends toward more integration, where 49% of its population being White , 8% Black, 39% Hispanic, 2% Asian.
- Census Tract 010115, which is the medical center area, has a high concentration of White residents (82%) and 8% Black, 5% Asian, and 4% Hispanic groups.

### **Integrated Area Trends North and South:**

- The North River Area is highly integrated area with White, Black, Hispanic, Asian, and Multi-racial residents. This area also reflects populations from a variety of national origins, including Brazil, India, and China among other countries.
- Census Tract 010117, in the area surrounding North Springs High School, tends to be somewhat integrated where approximately over 46% of the population is Black, 36% White, and 11% Hispanic, and 4% Asian.
- Census Tract 010118, appears to be an integrated area where the Dunwoody Springs elementary school is located, 37% is White, 36% is Black, 18% is Hispanic, and 5% is Asian.
- Census Tract Code 010119 where the Dunwoody Crossing Apartment Complex, North River Shopping Center, Carlyle Apartment homes, Avalon Townhomes, Ansley Place, and Legacy Key tends to be an integrated area where 44% is Black, 28% White , 24% Hispanic, 2% Asian.
- Census Tract Code 010209, in the Morgan Falls Area is somewhat integrated where 49% is Black, 31% White, 13% Hispanic, 5% Asian.
- Census Tract 010123, north of the Weber School, is also an integrated area where 43.3% is White, 29% Black, 24% Hispanic, and 4% Asian.

Figure 6 also maps where populations with Limited English Proficiency reside; it identifies the area south of I-285, fairly evenly distributed around Roswell Road on either side, as an area where predominantly Spanish-speaking populations demonstrate Limited English Proficiency.

**Figure 1 – Persons with Limited English, 2010**



**Name:** Map 4 - LEP

**Description:** LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

**c. Discuss how patterns of segregation have changed over time (since 1990).**

According to the Dissimilarity Index provided by HUD (Table 5.a), the City has experienced an overall increase of segregation from 1990 to 2010, upward from low scores to **low-moderate levels** in 2010 across all racial/ethnic groups. Of all groups, the Hispanic population has experienced higher levels of segregation compared to the other groups (index value of 52). In addition, Asian and Pacific Islanders groups experiences the lowest level of segregation (34 score).

The Race/Ethnicity Trends map (Figure 3) shows that in 1990, the City of Sandy Springs was composed of mainly White residents across all areas of the City, with minority populations dispersed in three areas of concentration – south of I-285 and in the north-eastern part of the City. In 2000, the Race/Ethnicity Trends map (Figure 4) shows a stronger presence of other racial/ethnic groups along the Roswell Corridor, especially on the Northern and Southern portion of the City. These trends continued through 2010 (Figure 5).

**Table 5.a: Racial/Ethnic Dissimilarity Index in Sandy Springs in 1990, 2000, and 2010**

Race/Ethnicity	1990	2000	2010
White	28.02	32.14	44.05
Black	33.24	37.63	47.90
Hispanic	34.99	43.19	51.83
Asian or Pacific Islander	13.61	24.12	33.93

Source: Decennial Census 2010; Brown Longitudinal Tract Data Base (LTDB) based on decennial census data, 2010, 2000 & 1990.

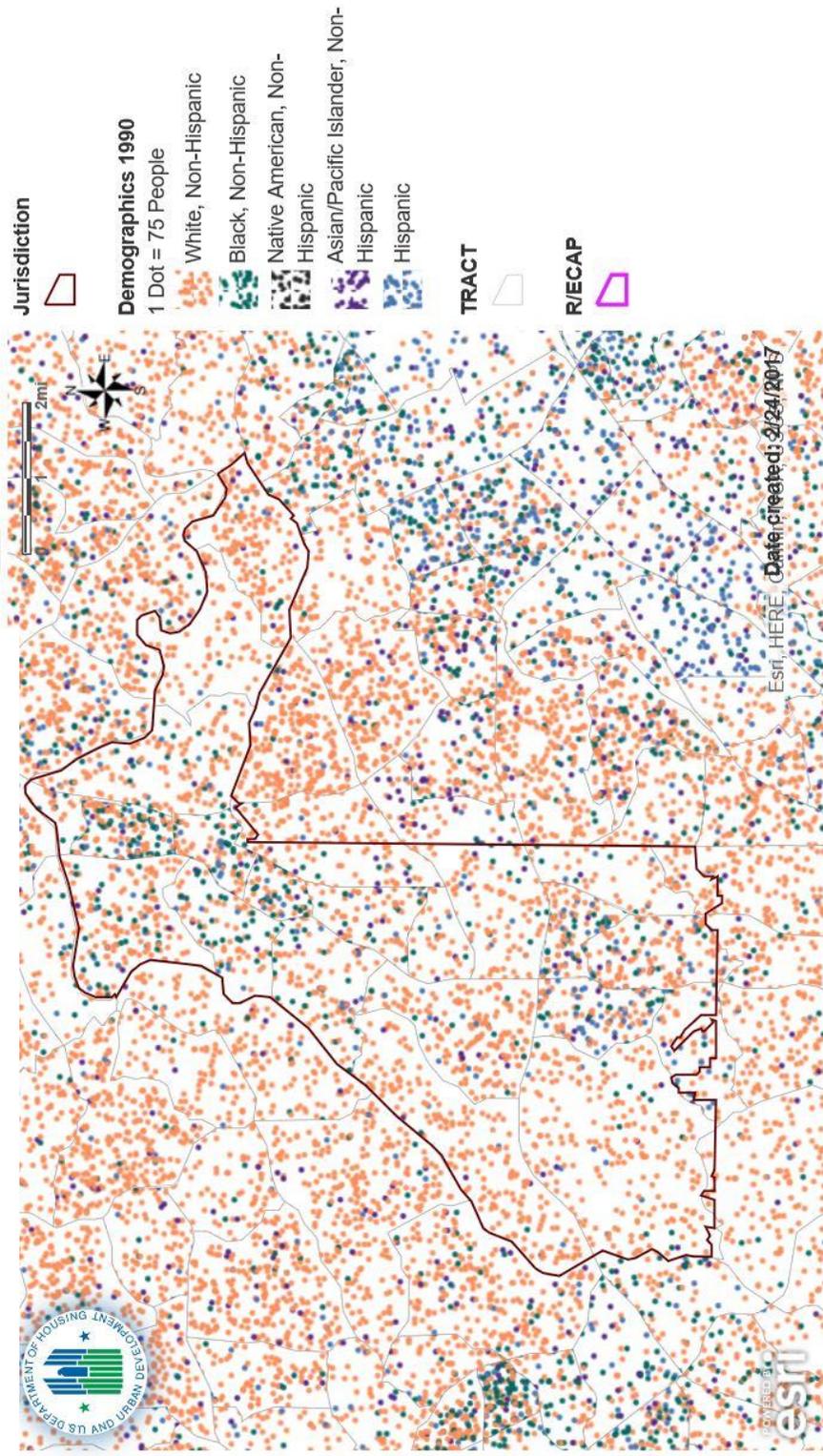
In the region, the levels of segregation have gradually increased during the years from 1990 through 2010 for Hispanics and Asians or Pacific Islanders, from low to moderate levels. However, the dissimilarity score for White and Black populations have decreased slightly, still maintaining a moderately high dissimilarity index values of segregation across 1900, 2000, and 2010.

**Table 5.b: Racial/Ethnic Dissimilarity Index in Atlanta-Sandy Springs-Roswell GA CBSA Region in 1990, 2000, 2010**

Race/Ethnicity	1990	2000	2010
White	59.99	56.14	53.82
Black	66.06	63.75	61.43
Hispanic	35.48	51.62	52.62
Asian or Pacific Islander	42.92	45.51	51.37

Source: Decennial Census 2010; Brown Longitudinal Tract Data Base (LTDB) based on decennial census data, 2010, 2000 & 1990.

**Figure 2- Race/Ethnicity in the City of Sandy Springs, 1990**



**Name:** Map 2 - Race/Ethnicity Trends

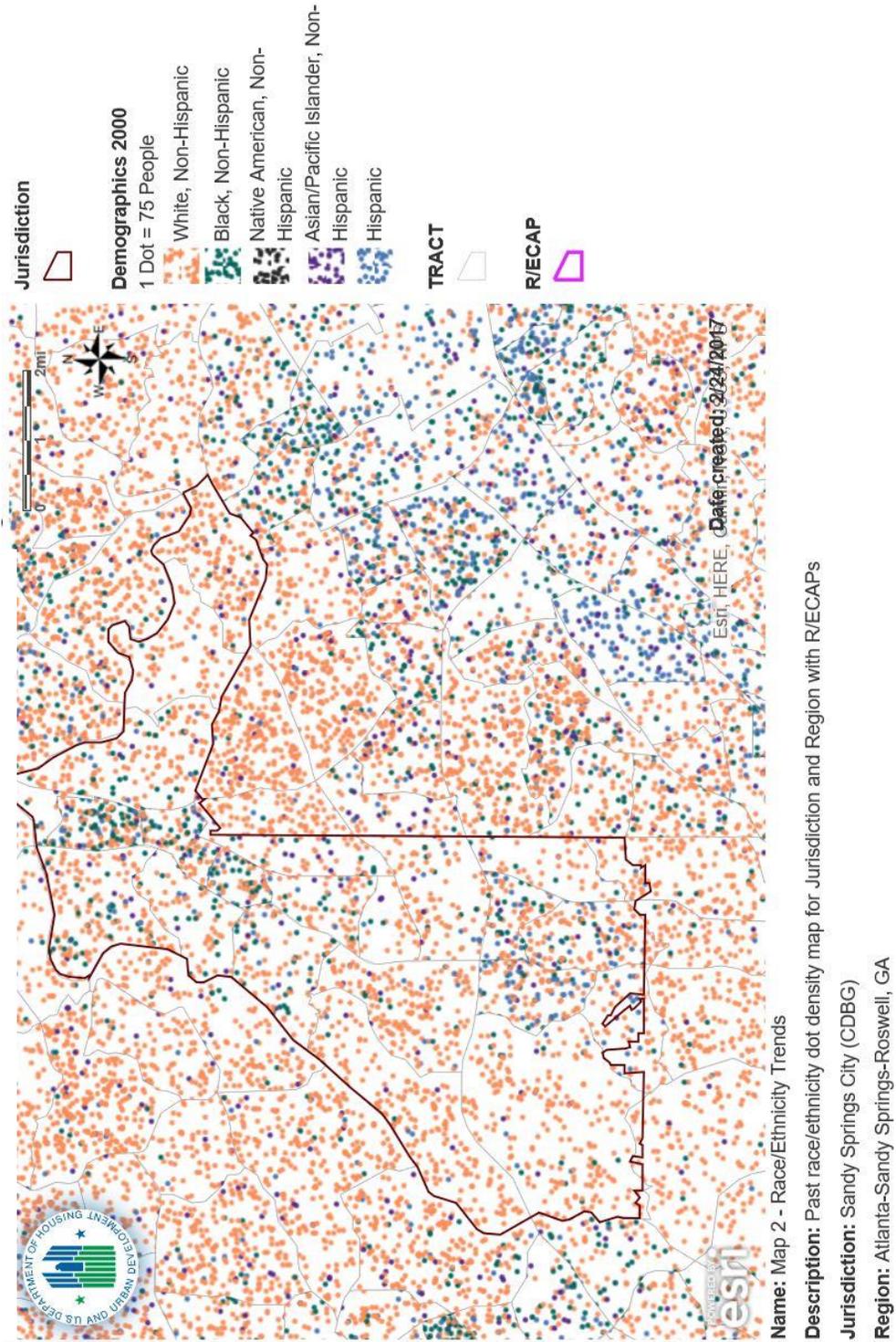
**Description:** Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

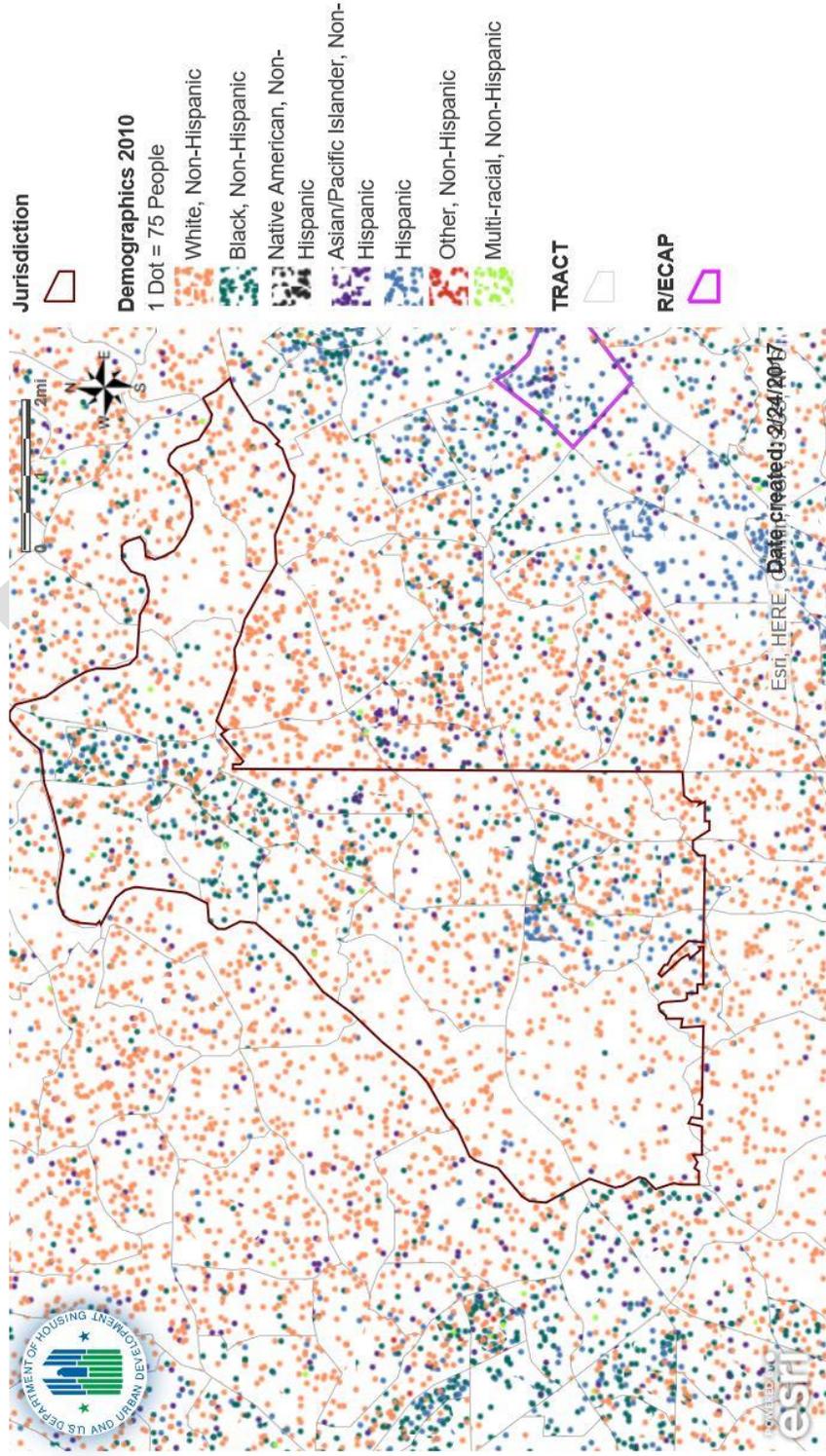
**Source:** Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990.

**Figure 3— Race/Ethnicity in the City of Sandy Springs, 2000**



Source: Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990

**Figure 4– Race/Ethnicity in the City of Sandy Springs, 2010**



**Name:** Map 1 - Race/Ethnicity

**Description:** Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

**Source:** Decennial Census, 2010

**d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas.**

Census Tracts 010106, 010107, 010108, which represent the Panhandle area are characterized by a large number of single-family houses, occupied at 98% by homeowners. This area appears to be historically segregated with 90% of White residents.

Census Tract 010208 includes the area surrounded the Cherokee Country Club and extends to Roswell Road with a mix of single-family homes and multi-family units toward and along Roswell Road. This area demonstrates moderately segregated trends by race with 68% White residents, 16% is Black, 6% is Hispanic, and 4% is Asian comprising the Tract, and predominantly renter occupied housing - 77%, compared to 23% owner-occupied units.

Census Tract 010118, the area surrounding Dunwoody Springs Elementary School is an integrated area where 37% of the population is White, 36% is Black, and 18% is Hispanic, and 5% Asian. This area shows 76% rented-occupied units compared to 24% owner-occupied units.

Census Tract 010117, where Morgan's Landing Apartment Complex and the North Springs High School are located, tends to be integrated where 31% of residents are White, 38% are Black, and 17% are Hispanic. The vast majority of dwelling units (87%) are occupied by renters.

Census Tract 010209, which is the Morgan Falls area tends to be an integrated area where 30% is White, 47% is Black, 12% is Hispanic, and 5% is Asian. This area has 77% renter occupied units compared to 23% owner occupied units.

Census Tract 010112, especially the area south of I-285 between Lake Forest Drive and Roswell Road, is predominantly Hispanic (79%), with 14% White, 5% Black, and 2% Asian. In adjacent Census Tract 010113, the area between I-285 and Lake Placid Drive Hispanics also hold the majority, albeit less pronounced at 55% of the total, while, 27% are Black, 12% are White and 3% are Asian; both Census Tracts have 80% renter-occupied units compared to 19% owner-occupied units.

According to HUD estimates (Table 6), the majority of owner-occupied households in Sandy Springs are White (87%), compared to the percent occupied by minorities (13%). Rental units are more diversely occupied - around 42% are occupied White households, 35% by Black households, 15% by Hispanic, and 6% by Asian. The disparity in homeownership is greater in the City than in the metro region, where the ratios show around 65% of home-owner occupied units are White and around 35% owned by minority groups (Table 6).

**Table 6: Homeownership and Rental Rates by Race/Ethnicity: City and Region (2008-2012)**

Race/Ethnicity	(Sandy Springs City, GA)				(Atlanta-Sandy Springs-Roswell)			
	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	17,005	86.54%	9,180	41.59%	821,800	65.35%	238,545	36.14%
Black, Non-Hispanic	1,180	6.01%	7,770	35.20%	308,060	24.50%	302,019	45.76%
Hispanic	615	3.13%	3,210	14.54%	58,475	4.65%	77,169	11.69%
Asian or Pacific Islander, Non-Hispanic	685	3.49%	1,420	6.43%	51,456	4.09%	30,187	4.57%
Native American, Non-Hispanic	40	0.20%	0	0.00%	2,844	0.23%	1,584	0.24%
Other, Non-Hispanic	120	0.61%	490	2.22%	14,939	1.19%	10,449	1.58%
Total Household Units	19,650	-	22,075	-	1,257,610	-	659,970	-

Note 1: Data presented are numbers of households, not individuals.  
 Note 2: Data Sources: CHAS  
 Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008- 2012.

**e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.**

The City adopted the new Next 10 Comprehensive Plan in February 2017, which includes policies aimed at avoiding trends toward greater segregation. The new Comprehensive Plan commits to “adopting[ing] workforce housing policies and programs directed at improving affordability of rental and/or for sale housing for middle income households.” To implement this goal, the new Development Code (adoption expected for August 2017) will provide both incentives for the redevelopment of aging large apartment complexes into mixed-use and mixed-income development and mandates workforce housing set-asides (between 60% and 80% AMI minimums, depending on the project).

The City recognizes that its aging population will likely have particular needs in terms of physical and cognitive limitations and disabilities in the future. The provision of housing for the elderly was considered in the creation of the Development Code, which will allow for a greater diversity in housing types and specifies required amenities.

**2. Additional Information**

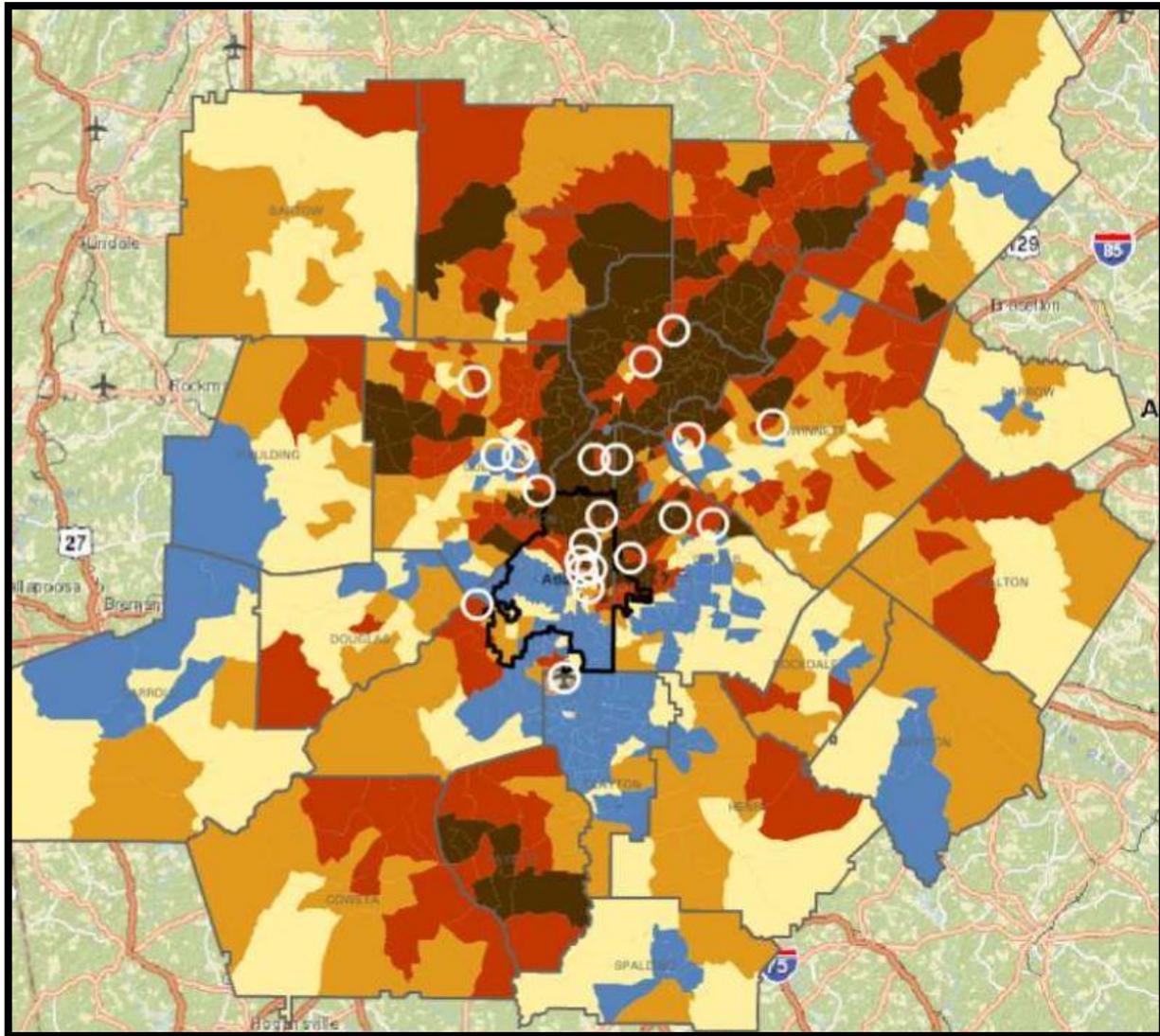
**a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

Based on community input, most people did not consider their neighborhood to be segregated, on the contrary, meeting participants reported that their community was diverse and welcoming to everyone. They did indicate that they felt home-ownership segregation was likely related to the relationship between ethnicity/race and income.

There appears to be a strong relationship between income, ownership and Race/Ethnicity, resulting in the existing patterns of concentrated home-ownership of high cost housing. The soaring land

values in Sandy Springs clearly limits affordability, and the location near employment centers contributes to the continued increase in housing values.

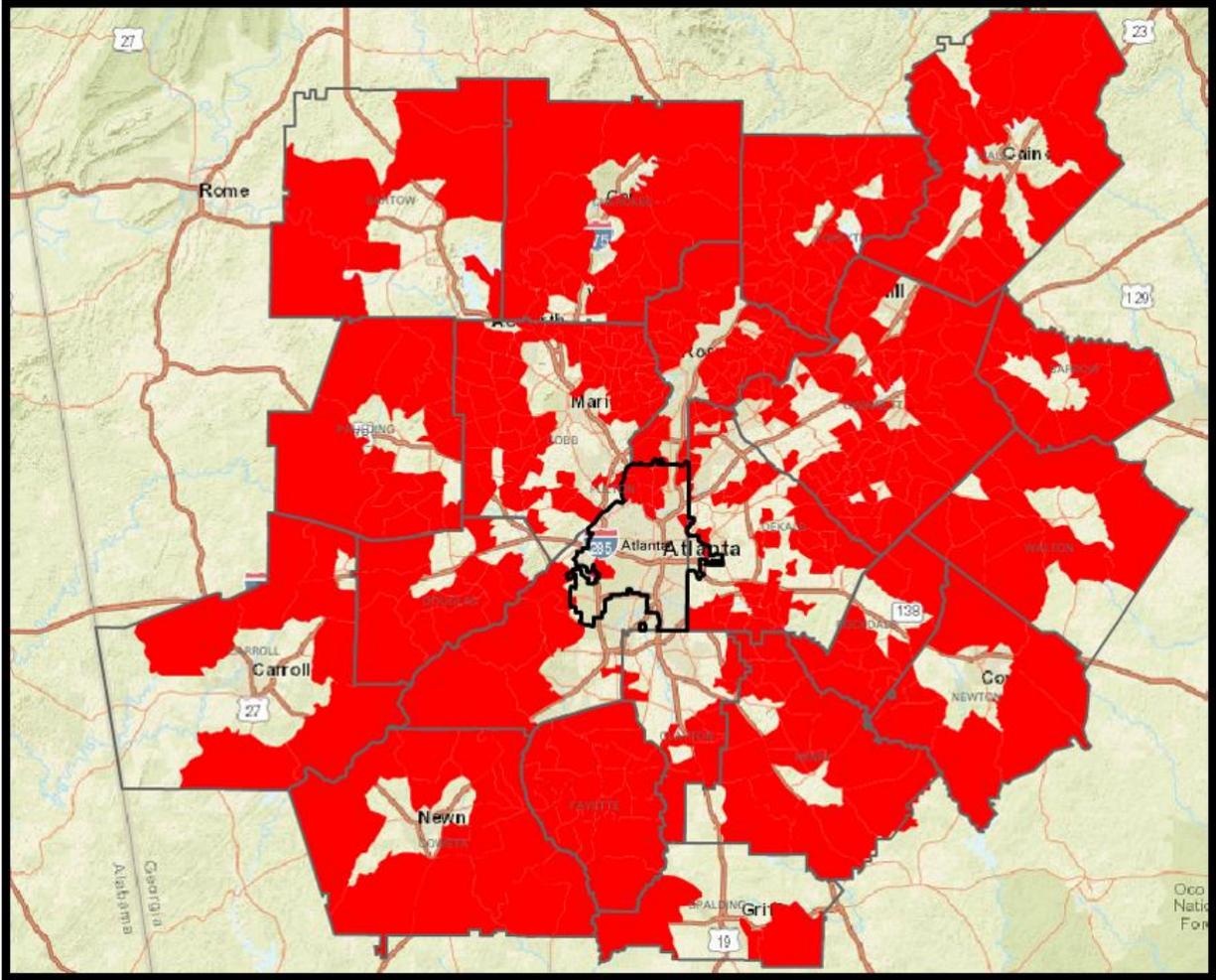
Regional data further underscores the high cost of housing in all of north Fulton. Analysis prepared by the ARC shows that housing values are higher near major employment centers. In the map below, the dark brown and red areas indicate high housing costs. The City of Sandy Springs is located in a regional employment center, with extremely high concentrations of Class A office and regional medical jobs.



Source: ARC, 2010-2014 American Community Survey.

The ARC also examines how transportation costs complicate the affordability picture. Some areas of the metro area spend 20% or more of household income on transportation alone. The map below identifies how few places in the region a family of four can live with an income of \$57,000 and spend less than 50% on housing and transportation combined. All the areas in red show where a

family with this income spends *50% or more* of their household income just on housing and transportation.



Source: ARC, Location Affordability Portal.

Regarding other housing problems, the City of Sandy Springs has committed to improving conditions of rental properties since incorporation. The Code Enforcement Division performs apartment sweeps every year by conducting inspections in multi-family developments to help protect the health and safety of residents. The Code Enforcement Division performs on average 12 apartment sweeps per year and 12 re-inspections by rotating approximately 70 properties over the course of five years. Additionally, multi-family properties are required to be inspected annually by certified third-party inspectors over the course of five years by going into the units to check for code compliance. This inspection is a requirement for property managers, monitored via annual business license renewal.

**b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.**

No additional information is available at the moment.

### 3. Contributing Factors of Segregation

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

Of the list of potential factors HUD requires jurisdictions to consider, the following three seem most applicable to conditions in Sandy Springs:

- Displacement of residents due to economic pressure
- Historic patterns of land use and zoning laws
- Location and type of affordable housing

#### ii. Analysis Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

##### 1. Analysis

##### a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

According to the demographic mapping tools provided by HUD, the City of Sandy Springs does not have tracts of any R/ECAP areas (Figure 8). This map overlays an index of poverty over the distribution of race and ethnic populations in the City. The federal government establishes the poverty rate and updates that figure annually with adjustments for household size. In 2015, the poverty rate for a **family of four was adjusted to \$24,257**. Sandy Springs' median household income is considerably higher than that of the greater Atlanta Region: for 2015, it was \$65,913 in Sandy Springs, compared to regional median income of \$56,889. Sandy Springs' income distribution is skewed to the extremes with large percentage of residents in the lowest and highest income brackets, as shown in Figure 7.a.

Approximately, 12.3% of the population in the City lives in poverty. While not categorized as R/ECAP *per se*, a few areas in the City demonstrate these households are somewhat concentrated geographically by race or ethnicity. Specifically, the map in Figure 7.b shows three predominantly minority areas with high incidents of poverty:

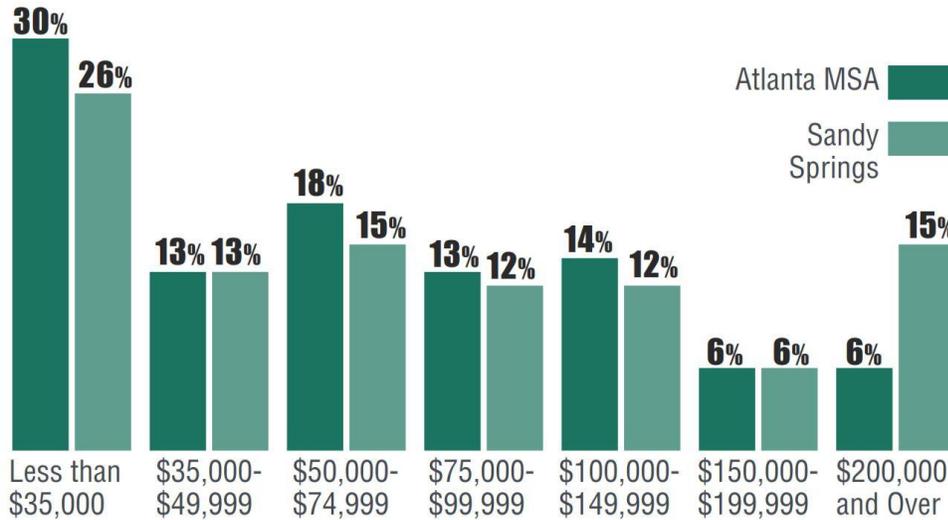
- Census Tract 010119 (area surrounding the Northridge Shopping Center) live in poverty (80%).
- A portion of Census Tract 010212 (near the Prado commercial area located south of I-285 and west of Roswell Road) also has 80% of households below the poverty level.
- Census Tract 010117 in the area surrounding the North Spring High School has approximately 60% to 80% residents out of the total population below the poverty level.

With less pronounced concentrations of poverty, the following additional areas demonstrate potentially vulnerable conditions:

- Census Tract 010118, which is the area surrounding the Dunwoody Springs Elementary, has approximately 20-40% of its total population living below poverty rate.

- Census Tract 010113, which is the area surrounding the Perimeter Circle Apartment Homes, has approximately 20% to 40% of its residents living below poverty level.

**Figure 7.a Household Income in the City of Sandy Springs and the Atlanta Metropolitan Statistical Area**

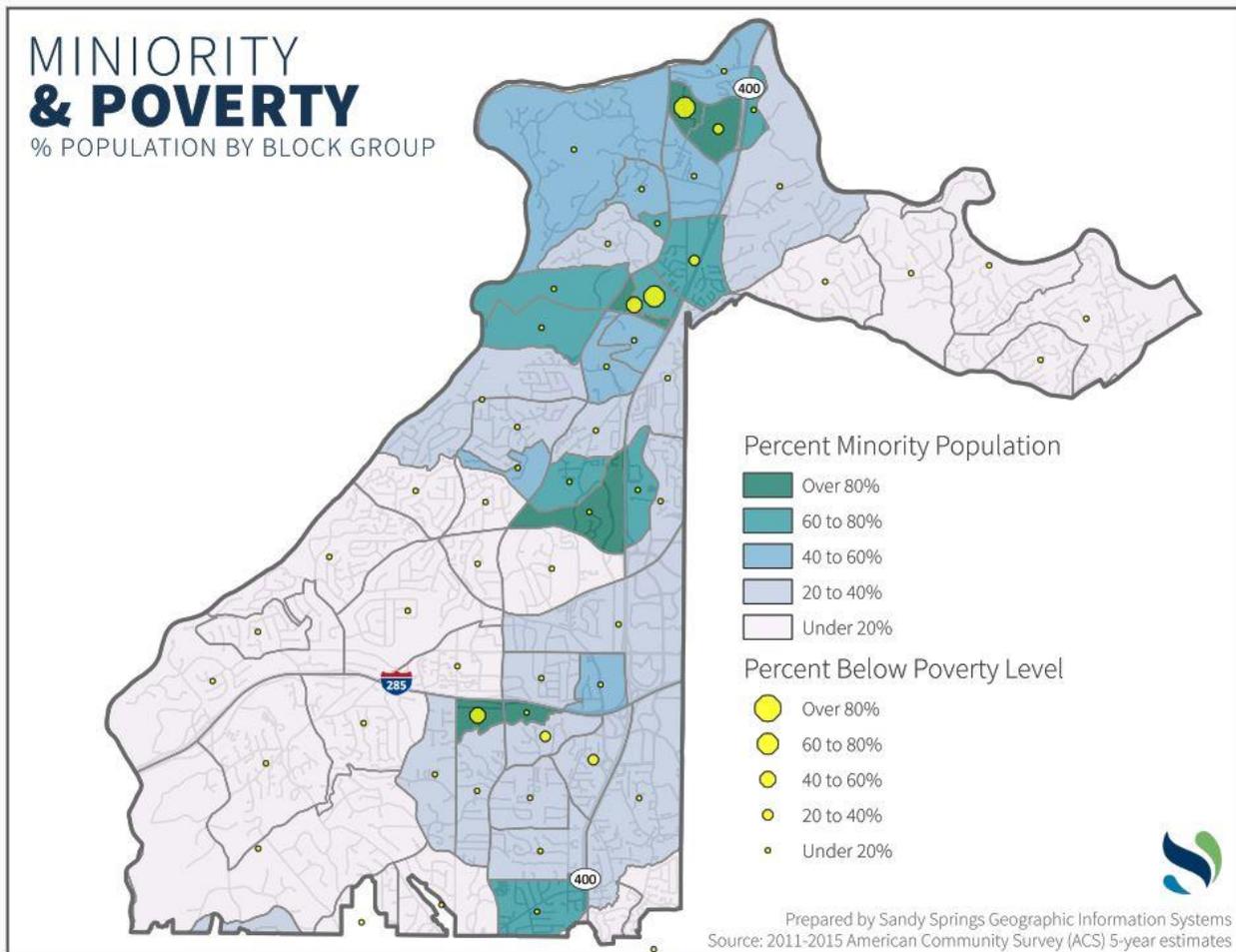


## HOUSEHOLD INCOME

(Esri Business Analyst; Moody's Analytics; RCLCO) (American Community Survey, 2009-2013; RCLCO)

Source: American Community Survey (ACS), 2009-2013; RCLCO.

**Figure 7.b: Percentage below poverty level by Block Group in the City of Sandy Springs**



Source: American Community Survey (ACS) 5-Year Estimates, 2011-2015.

**b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?**

As mentioned above, the City has no areas classified as R/ECAPS. However, in addition to the potential areas identified above, analysis shows trends toward some concentration of poverty by protected classes as follows:

- Census Tract 010212 (area surrounding Lake Forest Park and the Fountain Oaks Shopping Center) is concentrated with Hispanic households (80%), of which 40% to 60% live below the poverty level. The foreign-born population is constituted of 70% Mexicans, 23% residents from El Salvador, and 6% India.

Census data for the region shows that Black households disproportionately comprise R/ECAP areas (69%), compared to White households, which constitute 12% of R/ECAPs and Hispanics, which represent 10% of R/ECAP populations (Table 7).

**Table 7 – R/ECAP Demographics in the City and Region**

	(Sandy Springs City, GA CDBG)		(Atlanta-Sandy Springs-Roswell, GA) Region		
R/ECAP Race/Ethnicity	#	%		#	%
Total Population in R/ECAPs	0	-		191,188	-
White, Non-Hispanic	0	N/a		22,209	11.62%
Black, Non-Hispanic	0	N/a		131,884	68.98%
Hispanic	0	N/a		26,529	13.88%
Asian or Pacific Islander, Non-Hispanic	0	N/a		6,891	3.60%
Native American, Non-Hispanic	0	N/a		404	0.21%
Other, Non-Hispanic	0	N/a		337	0.18%
<b>R/ECAP Family Type</b>					
Total Families in R/ECAPs	0	-		37,816	-
Families with children	0	N/a		19,445	51.42%
<b>R/ECAP National Origin</b>					
Total Population in R/ECAPs	0	-		191,188	-
#1 country of origin	Null	0.00%	Mexico	10,598	5.54%
#2 country of origin	Null	0.00%	Burma	1,594	0.83%
#3 country of origin	Null	0.00%	Ethiopia	1,307	0.68%
#4 country of origin	Null	0.00%	Vietnam	1,266	0.66%
#5 country of origin	Null	0.00%	Honduras	1,211	0.63%
#6 country of origin	Null	0.00%	Other South Central Asia	1,105	0.58%
#7 country of origin	Null	0.00%	El Salvador	986	0.52%
#8 country of origin	Null	0.00%	India	908	0.47%
#9 country of origin	Null	0.00%	Other Eastern Africa	693	0.36%
#10 country of origin	Null	0.00%	Guatemala	668	0.35%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region					
Note 2: Data Sources: Decennial Census; ACS					
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).					

Source: Decennial Census, 2010; American Community Survey (ACS) 2009-2013.

**c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).**

The HUD-provided data (Table 7 & Figure 8.A) does not show any record of R/ECAP tracts within the City of Sandy Springs and there is no local data available that could indicate a specific trend.

## **2. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**

No additional information is currently available.

**b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.**

No additional information is currently available.

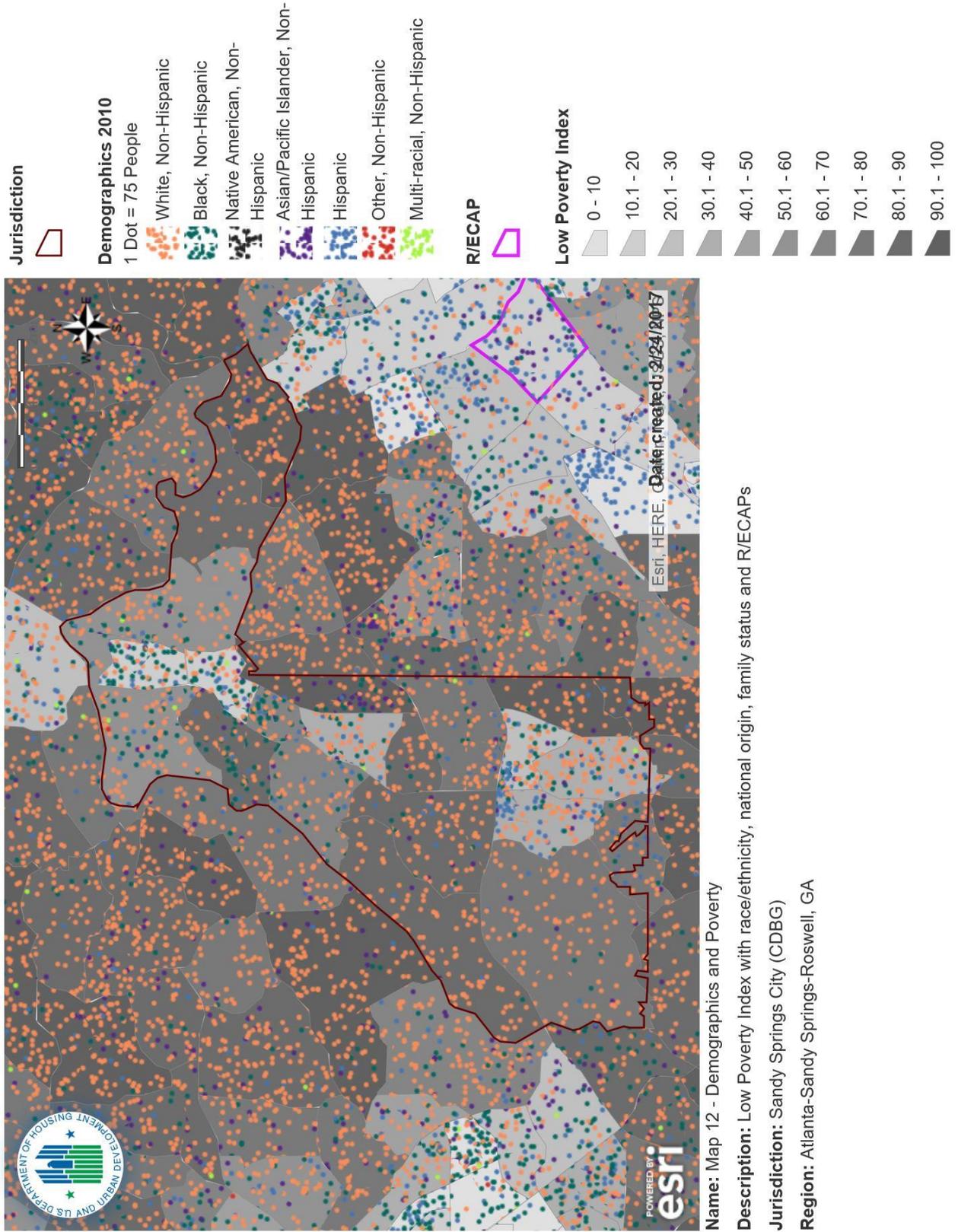
## **3. Contributing Factors of R/ECAPs**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

From the list of factors provided by HUD, the following two seem most likely affecting trends of the coinciding characteristics of race and poverty:

- Lack of private investment in specific neighborhoods
- Location and type of affordable housing

**Figure 8.A - Racially and ethnically areas of Poverty in the City of Sandy Springs, 2010**



### iii. Disparities in Access to Opportunity Analysis

#### 1. Analysis

##### a. Educational Opportunities

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##### **i. Describe any disparities in access to proficient schools based on race-Ethnicity, national origin, and family status.**

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where information is available) of individuals sharing a protected characteristic within 1.5 miles of the block-group centroid. The values for School Proficiency Index are determined by the performance of 4<sup>th</sup> grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby, and which are near lower performing elementary schools. Figures 9, 10, and 11 show the spatial distribution of racial/Ethnicity and national origin groups and families with children, overlaid by shading that shows school proficiency levels for the jurisdiction and the region. In each map, lighter shading indicate areas of lower opportunity and darker shading indicates higher opportunity. A few areas show some trends toward disparities.

Based on the observed spatial distribution patterns, the Panhandle area to the northwest (Census Tracts 010106, 010107, 010108) and the Southwest area of the City (Census Tracts 010204, 010205, 010206) surrounded by the Chattahoochee River, the Atlanta City limit, Lake Forrest Drive, and Johnson Ferry Road have the following characteristics:

- Highly concentrated white populations with mostly low levels of poverty
- Families with children represent approximately 40% of the population
- Greater access to proficient schools, with a proximity index value of 75-90.
- Income range from \$80,000 and more.

The area south of I-285 between Lake Forest Drive and Roswell Road (a portion of Census Tract 010212) has the following characteristics:

- Highly concentrated Hispanic populations
- 40-60% of its population live below the federal poverty line.
- Approximately 70% of the population are families with children
- Primary language is Spanish
- Less convenient access to proficient schools, with an average proficiency index of 28.
- Income range from \$20,000 to \$40,000

Morgan Falls, Northridge area, Morgan's Landing area, (Census Tracts 010209, 010119, 010118, and 010117) demonstrate the following characteristics:

- Appears to be a fairly integrated area
- Approximately 40% of the population is Black

- Indicates low-moderate access to proficient schools with values ranging 30-40
- Over 40% of households are families with children.
- Income range from \$20,000 to \$60,000

Table 8 presents a School Proficiency Index and an Index of Poverty, as indicators of opportunity by race and ethnicity and compares the City to the broader region; this data shows the following:

In the City of Sandy Springs, White residents in general live in neighborhoods with greater access to proficient schools, with the highest school proficiency score of 57. The next highest index value is captured by Native-Americans with a score of 49, Asian residents are next with a score of 47. The Asian population represents only 5% of the total population, and Native Americans constitute an even smaller percentage (0.17%). Black residents have a school proficiency index value of 47, and Hispanics index value is shown to be 43, which is 14 points lower than White populations.

Analyzing persons living below the federal poverty line within the City of Sandy Springs, White, Asian, and Native American populations have the highest value index ranging from 55 to 61, showing greater access to neighborhoods with proficient schools, while Black and Hispanic residents maintain the lowest score of 50 and 45, respectively (Table 8).

At the regional level, similar results emerge, with White, Asian, and Native American groups assigned the highest indices of access to proficient schools, ranging from 52 to 68. Regionally Asian and Native American populations constitute 5% and 0.20% of the total region's population, respectively. Hispanics have somewhat greater access to good schools at the regional level, with an index value of 51, while Black populations have a substantially less access, with an index value of just 35. Looking at the population below the federal poverty line, Whites, Asians, and Native Americans also have greater access to proficient schools having the highest scores compared to Hispanic and Black populations.

Hispanic and Black populations tend to live in neighborhoods that have less access to proficient schools at both regional level and at the City level. Overall, however, there seems to be a better balance in the City of Sandy Springs than in the region as a whole.

**Table 8 – Opportunity Indicators by Race/Ethnicity**

(Sandy Springs City, GA CDBG) Jurisdiction	Low Poverty Index	School Proficiency	Labor Market	Transit Index	Low Transportation	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	68.19	57.45	88.52	82.56	57.75	62.09	24.76
Black, Non-Hispanic	52.42	47.11	81.46	88.78	69.65	54.39	24.89
Hispanic	47.21	43.62	82.09	88.07	68.07	48.88	23.26
Asian or Pacific Islander, Non-Hispanic	69.32	47.64	87.91	86.32	66.10	66.63	31.69
Native American, Non-Hispanic	57.80	49.43	83.45	86.04	65.36	60.35	24.13
<b>Population below federal poverty line</b>							
White, Non-Hispanic	61.73	54.78	84.93	84.31	62.28	61.94	25.42
Black, Non-Hispanic	40.98	50.14	77.48	89.21	70.38	56.93	27.15
Hispanic	39.90	46.95	82.18	89.15	69.52	52.09	27.04
Asian or Pacific Islander, Non-Hispanic	68.10	61.13	85.71	84.06	61.70	55.89	34.44
Native American, Non-Hispanic	86.30	58.85	94.19	81.11	55.40	78.66	23.98
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>							
<b>Total Population</b>							
White, Non-Hispanic	59.35	68.45	61.52	58.30	34.86	50.04	32.29
Black, Non-Hispanic	38.43	35.03	41.61	68.30	43.71	45.96	22.01
Hispanic	38.88	51.41	51.53	70.82	48.30	52.25	24.86
Asian or Pacific Islander, Non-Hispanic	57.60	65.17	66.71	71.05	45.34	54.69	23.21
Native American, Non-Hispanic	48.54	52.46	52.00	61.84	39.04	50.20	28.11
<b>Population below federal poverty line</b>							
White, Non-Hispanic	47.46	56.43	49.82	57.16	36.88	50.47	33.14
Black, Non-Hispanic	27.64	29.61	33.26	71.42	48.93	47.60	20.17
Hispanic	28.15	48.22	45.56	73.77	52.50	53.18	22.94
Asian or Pacific Islander, Non-Hispanic	48.37	54.43	59.53	74.51	52.73	56.83	19.46
Native American, Non-Hispanic	37.79	51.07	43.25	63.50	42.33	54.17	28.70
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							

Source: Decennial Census, 210; American Community Survey (ACS) 2009-2013; Great Schools, 2012; Common Core of Data (4<sup>th</sup> grade enrollment and school addresses), 2012; School Attendance Boundary Information System (SABINS), 2012; Longitudinal Employer-Household Dynamics (LEHD), 2013; National Air Toxics Assessment (NATA) data, 2005.

**Table 8 – (Subsection) School Proficiency Opportunity Indicators by Race/Ethnicity in the City and Region**

<b>Table 8 - Opportunity Indicators by Race/Ethnicity</b>	
<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>	<b>School Proficiency Index</b>
White, Non-Hispanic	57.45
Black, Non-Hispanic	47.11
Hispanic	43.62
Asian or Pacific Islander, Non-Hispanic	47.64
Native American, Non-Hispanic	49.43
<b>Population below federal poverty line</b>	
White, Non-Hispanic	54.78
Black , Non-Hispanic	50.14
Hispanic	46.95
Asian or Pacific Islander, Non-Hispanic	61.13
Native American, Non-Hispanic	58.85
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>	
White, Non-Hispanic	68.45
Black , Non-Hispanic	35.03
Hispanic	51.41
Asian or Pacific Islander, Non-Hispanic	65.17
Native American, Non-Hispanic	52.46
<b>Population below federal poverty line</b>	
White, Non-Hispanic	56.43
Black , Non-Hispanic	29.61
Hispanic	48.22
Asian or Pacific Islander, Non-Hispanic	54.43
Native American, Non-Hispanic	51.07
Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA	
Maybe add a column for the region’s data, as opposed to having it below? It would be easier to compare.	

Source: Great Schools, 2012; Common Core of Dara (4<sup>th</sup> grade enrollment and school addresses), 2012; School Attendance Boundary Information System (SABINS), 2012

**ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.**

Of around 45,000 households in Sandy Springs, over half are families (55%), and just over a quarter of households include children. However, only 66% of the families with children choose to send their children to the public schools system, while the remaining 34% of families opt to send their children to private schools –more than twice the regional percentage of children attending private schools (14%) (The Next 10 Comprehensive Plan p. 37).

As reported in prior sections, 59% of the Sandy Springs residents are White, 20% are Black, 14% are Hispanic, 5% are Asian and 0.17% are Native American. However, a large percentage of the student population in public schools are non-White when compared to the overall population

For example, approximately 34% of public school students are Hispanic compared to the total Hispanic population of 14%. 32% of the student population is Black, compared to 20% of the total population. Meanwhile the percent of White students enrolled in public schools in Sandy Springs is 27% while comprising 59% of the total population (Table 9).

Areas of the City that have higher percentage of owner-occupied units and characterized as predominantly White have both a smaller percentage of families with children, and a higher index of access to proficiency schools, compared to other areas. On the other hand, other racial/ethnic groups such as Blacks, Hispanics, Asians, tend to live in areas of the City where there are high number of aging renter-occupied units and have either moderate or low access to proficient schools according to the access to School Proficiency Index provided by HUD.

**Table 9 – 2015- 2016 School Year Demographic Composition in the City of Sandy Springs.**

<b>Table 9 - School Year Demographic Composition 2015-2016</b>					
<b>Public Schools in Sandy Springs</b>	<b># Students</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>
Total Elementary Schools	5,217	27%	26%	39%	5%
Total Middle Schools	1,957	25%	30%	39%	3%
Total High Schools	3,084	29%	40%	24%	3%
Total	10,258	27%	31%	34%	4%

Source: Fulton County Schools 2015-2016.

**iii. Describe how school-related policies, such as school enrollment policies, affect a student’s ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?**

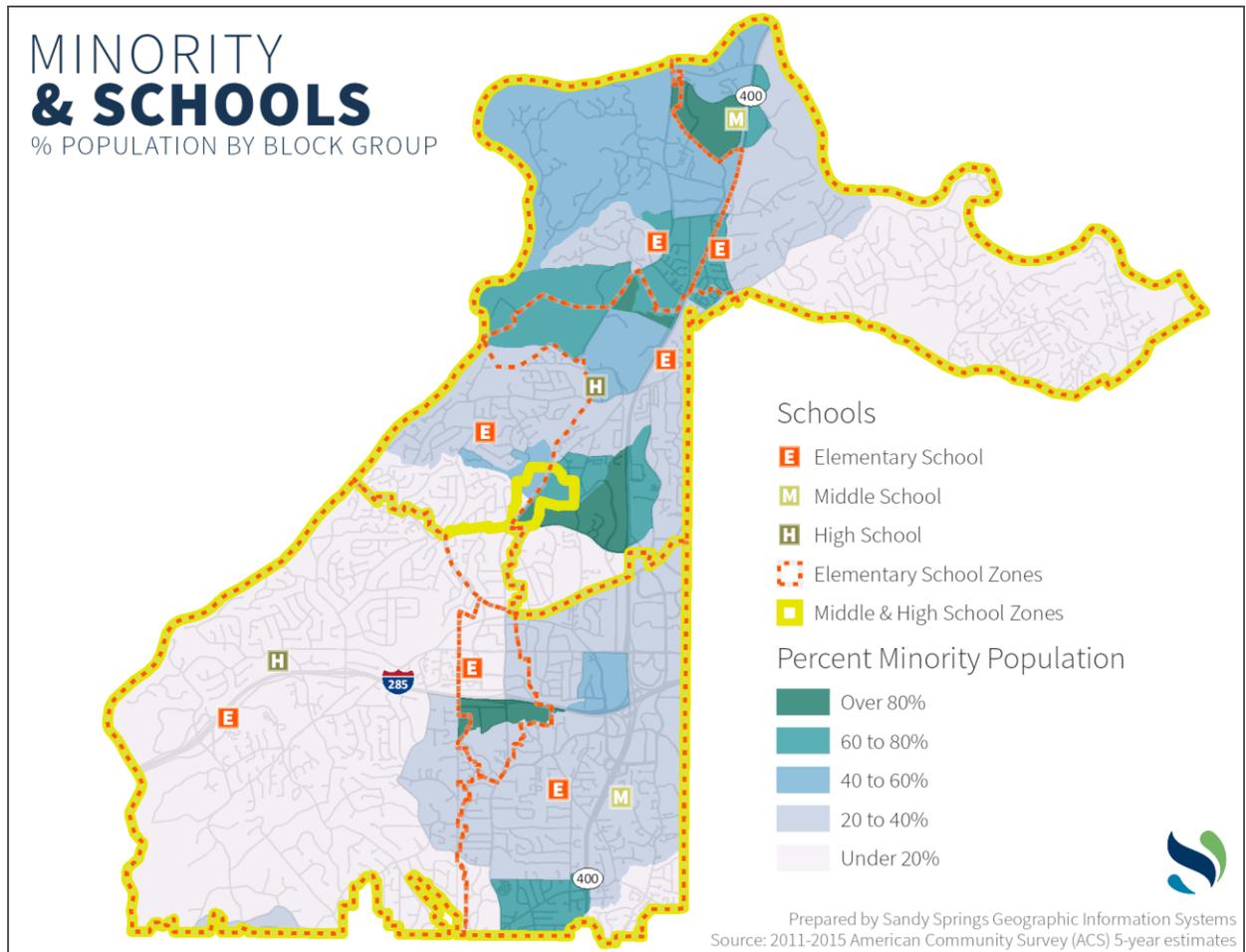
The City of Sandy Springs is served by the Fulton County School District. According to comments from stakeholders, the boundaries of the Fulton County Schools’ mandated attendance zones impact performance levels at some of the elementary schools. Meeting participants voiced concerns that district boundaries are drawn such that a given school zone becomes dominated by one or more specific race, ethnicity or income group, which in Sandy Springs is highly correlated with access to housing type and affordability. For example, where census blocks exhibit high concentrations of low-income, Hispanic children and are all assigned to the same school zone, this disproportionate ratio impacts overall school performance, as measured by state exam scores.

The lower School Proficiency Index value for Hispanics, along with the map of School Zone Districts in Figure 8.B appear to support these concerns, at least partially. The map shows that the Lake Forest Elementary School district boundaries align with census blocks characterized by concentrations of Hispanic populations living in the multi-family complexes located in that area. Similar patterns are observed for the Woodland Elementary School and to a lesser degree, the Dunwoody Springs Elementary Schools are located. Fulton County School District representatives assert that the boundaries aim to reduce trip time for students and allow them to attend schools within their neighborhoods.

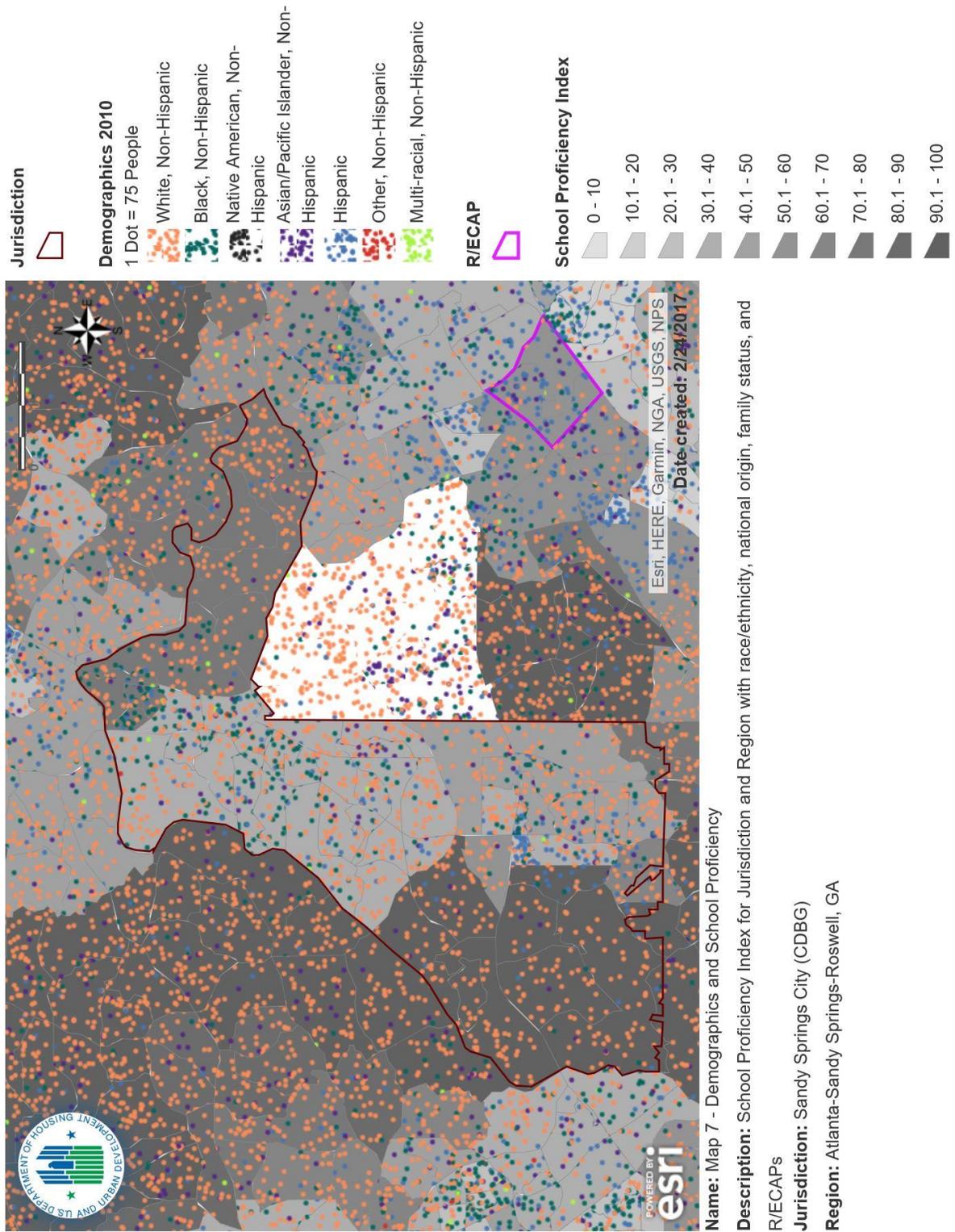
The City itself has no authority over School District determinations. However, organizations within the City work to supplement educational opportunities. A variety non-profit organizations that provide additional educational assistance for those in need. For example, Junior Achievement provides education to students about workforce readiness, entrepreneurship, and financial literacy through experimental, and hands-on programs. Los Ninos Primero provides after school education programs for Latino preschoolers and their families in Sandy Springs. The Sandy Springs Education Force supports educational needs of youth in Sandy Springs by identifying and facilitating supplemental programs and solutions through community partnerships. The Child Development Association provides affordable childcare and early learning programs for preschool children of low-income working families and prepares disadvantaged children for success in education and life.

DRAFT

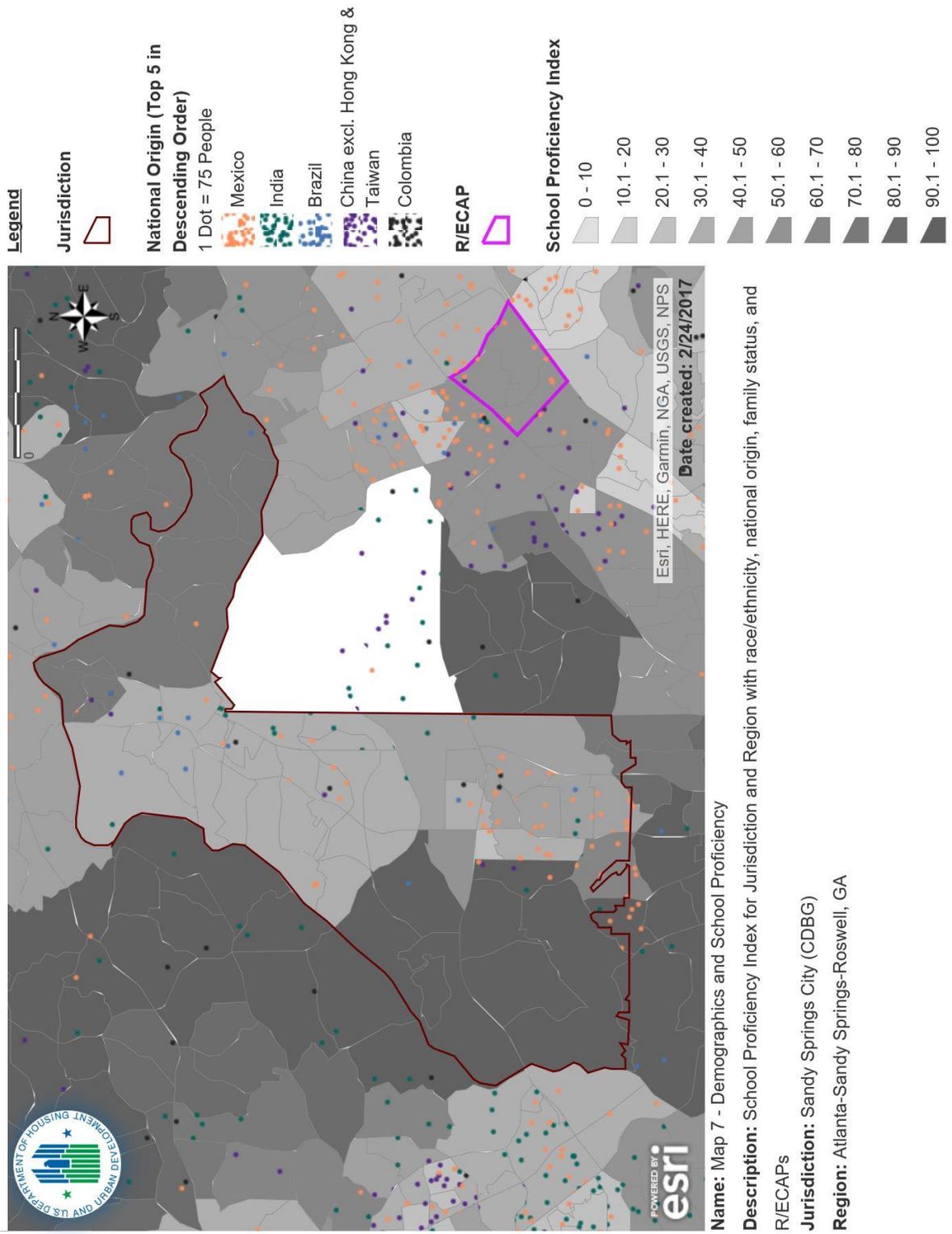
# MAP 8.B Sandy Springs School Zone Districts over Minority Population Distribution



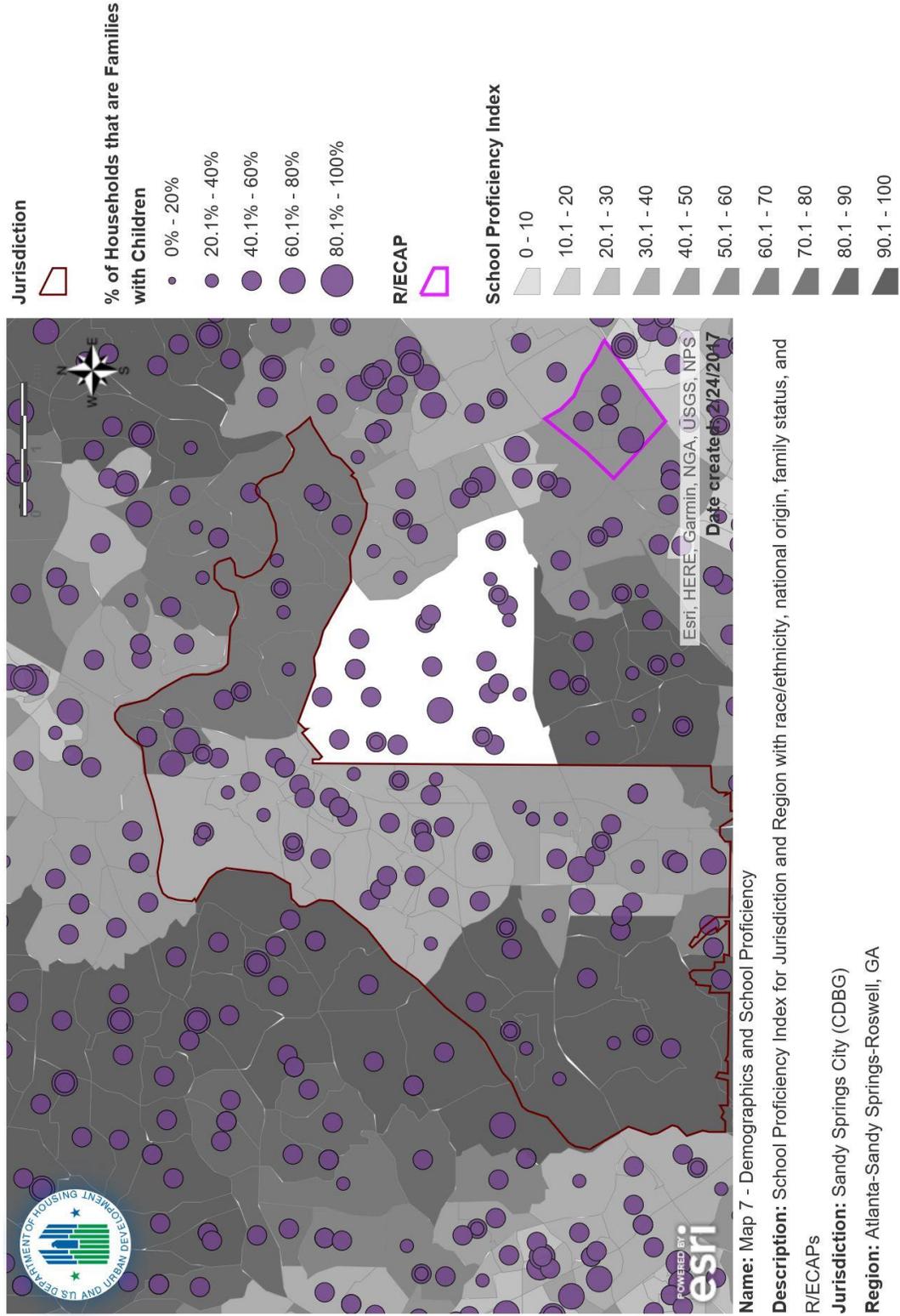
**Figure 9 – School Proficiency Index and Race/Ethnicity in the City of Sandy Springs, 2010.**



**Figure 10 – School Proficiency Index and National Origin in the City of Sandy Springs, 2010.**



**Figure 11 – School Proficiency Index and Households with Children in the City of Sandy Springs.**



## b. Employment Opportunities

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### i. Describe any disparities in access to jobs and labor markets by protected class groups.

Table 8– Opportunity Indicators by Race/Ethnicity show the Labor Market Index and the Jobs Proximity Index. According to the AFFH Data Documentation:

The Labor Market Index “provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a Census Tract. (Page 15)

The Job Proximity Index “quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations and measures the physical distances between place of residence and jobs by Race/Ethnicity.” (Page 13)

Values range from 0 to 100. The higher the index value, the better the access to employment opportunities for residents, high labor force participation, and high human capital of a neighborhood.

The map in Figure 12 shows how the residency patterns of racial/ethnic, national origin groups and families with children (labelled “family status”) are distributed geographically, overlaid by shading that shows the jobs proximity measure for the City. The map in Figure 13 depicts the residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows labor engagement for the City. Lighter shading indicates areas of lower opportunity and darker shading indicates areas of higher opportunity.

Looking at the Job Proximity Index categories from Table 8 at the City level, White, Asian, and Native American populations have scores above 60, indicating homes in closer proximity to work places than those of Black and Hispanic populations, which show scores of 49 and 55, respectively. For the segment of the population below the federal poverty line within the City, Native American and White populations maintain the highest scores of 79 and 62, compared to the rest of the racial/ethnic groups, which have slightly lower scores ranging from 52 to 57.

The Job Proximity Index values are lower at the regional level than the City. Regionally, the highest Job Proximity Index score is 54, reflected by Asian groups. Hispanics are next with a value of 52. Whites and Native Americans have similar scores of 50 and 50. Black populations have the lowest score of 46. For populations below poverty at the regional level, all Race/Ethnicity groups are evenly spread within nine points of each other, with the highest value attributed to Asians (57) and the lowest attributed to Blacks (48).

Based on labor market engagement data, White and Asian populations in Sandy Springs have the highest labor-force participation with index values of 89 and 88 respectively. Native American, Hispanics and Blacks, have lower scores ranging from 81 to 84. Of the population below the federal poverty line in the City, Native Americans have the highest participation index value of 94, around ten points higher than the next highest groups of Asians and Whites, with scores of 85 and 86, respectively. Black and Hispanics have the lower labor force participation with scores of 78 and

82, respectively. The residents of Sandy Springs overall demonstrate a higher labor market engagement than their counterparts in the region.

At the regional level, Asians and Whites also have higher labor market engagement with scores of 67 and 62. Native Americans and Hispanics follow with scores of 52 and 52. Black populations have the lowest labor engagement with a score of 42. For the population below the poverty level, Asians and Whites still maintain the highest scores of 60 and 50. Hispanics and Native Americans have scores of 46 and 43. Black population remain the group with the lowest labor engagement at the regional level below poverty limit with a score of 33.

In conclusion, all population groups in the City demonstrate high employment participation. At both the City and regional level White, Asians, and Native Americans have somewhat higher labor force participation even when controlling for income; Whites show a ten point difference compared to Blacks and Hispanics. The same groups scoring higher on the participation index are also the groups that demonstrate a slightly greater access to jobs, by a spread of just five points on the proximity index.

**Table 8 – (Subsection) Labor Market and Job Proximity Opportunity Indicators by Race/Ethnicity in the City and Region.**

<b>Table 8 - Opportunity Indicators by Race/Ethnicity</b>		
<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>	<b>Labor Mark Index</b>	<b>Jobs Proximity Index</b>
White, Non-Hispanic	88.52	62.09
Black, Non-Hispanic	81.46	54.39
Hispanic	82.09	48.88
Asian or Pacific Islander, Non-Hispanic	87.91	66.63
Native American, Non-Hispanic	83.45	60.35
<b>Population below federal poverty line</b>		
White, Non-Hispanic	84.93	61.94
Black, Non-Hispanic	77.48	56.93
Hispanic	82.18	52.09
Asian or Pacific Islander, Non-Hispanic	85.71	55.89
Native American, Non-Hispanic	94.19	78.66
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>		
White, Non-Hispanic	61.52	50.04
Black, Non-Hispanic	41.61	45.96
Hispanic	51.53	52.25
Asian or Pacific Islander, Non-Hispanic	66.71	54.69
Native American, Non-Hispanic	52	50.2
<b>Population below federal poverty line</b>		
White, Non-Hispanic	49.82	50.47
Black, Non-Hispanic	33.26	47.6
Hispanic	45.56	53.18
Asian or Pacific Islander, Non-Hispanic	59.53	56.83
Native American, Non-Hispanic	43.25	54.17

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Source: American Community Survey (ACS), 2009-2013; Longitudinal Employer-Households Dynamics (LEHD), 2013.

**ii. How does a person’s place of residence affect their ability to obtain a job?**

The City of Sandy Springs is a major, regional employment center. Yet, much of Sandy Springs’ workforce commutes from outside the City. The newly adopted Next 10 Comprehensive Plan states that “of the approximately 100,000 jobs in the City, fewer than 10 percent are held by Sandy Springs residents” (page 46), and the data suggest that this may be in part due to high housing costs. Additionally “approximately 7,000 both live and work in Sandy Springs, 38,000 people commute out to work, and 102,000 people commute into Sandy Springs for work.” (Page 46). As reported in an earlier section, the ARC has documented that housing costs are highest near employment centers. Greater distances impact productivity, job tenure and cost of transportation.

The City seeks to enhance transportation efficiency and options through investing in “Last Mile Connectivity” projects – that infrastructure that connects rail and bus transit more directly to employment centers, education facilities and places of residence.

**iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?**

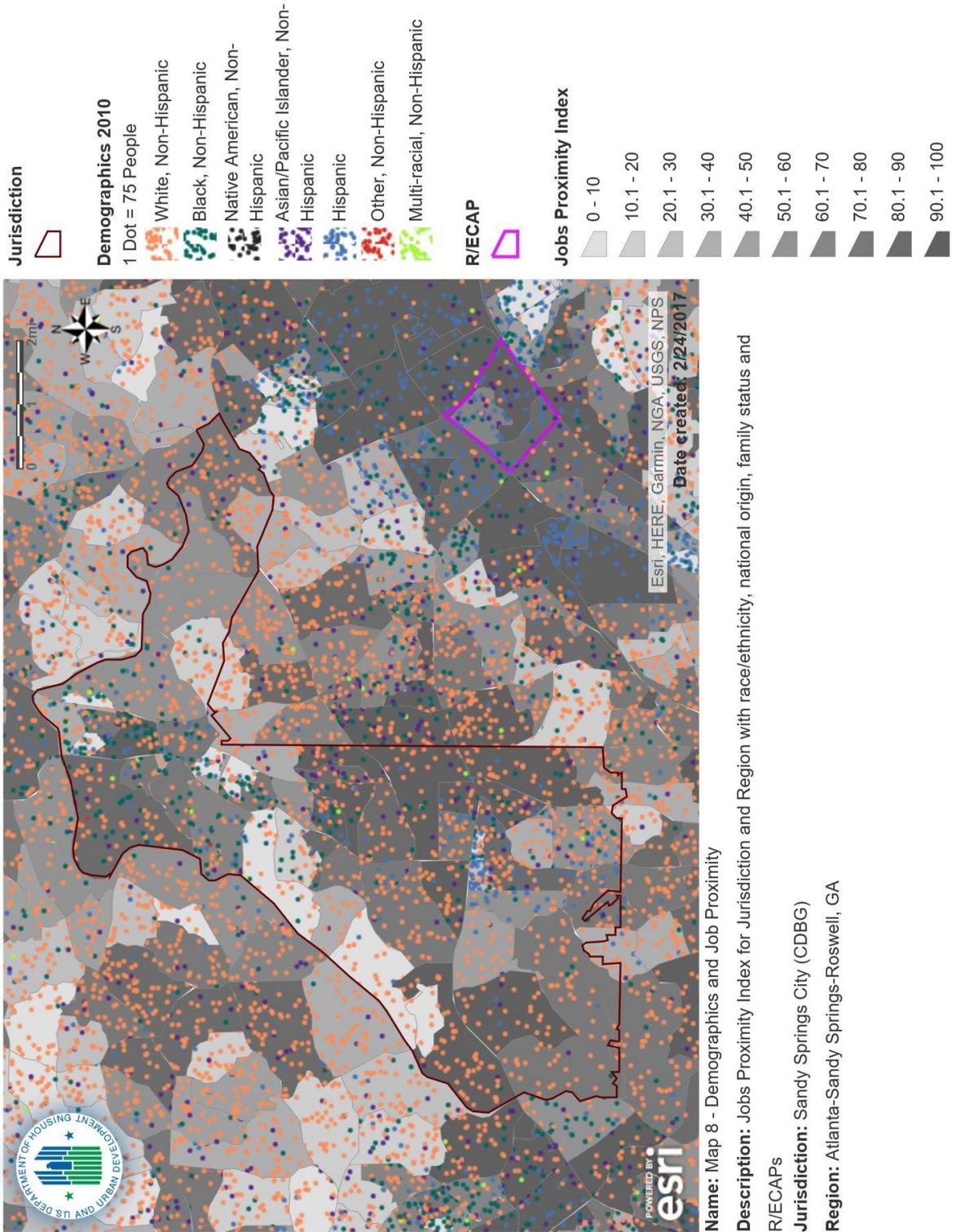
Based on the Jobs Proximity Index (Table 8, Figures 12 and 13), Hispanics are the least successful in accessing employment with a score of 49, which is 13 points below the White population (62) and 18 points below Asian Pacific Islanders (67), and 5 points below the Black population (54).

Further, of all foreign-born residents, those of Mexican, Brazilian and Colombian national-origin appear to be less likely to have opportunity to access the labor market (Figures 14 and 15). Language barriers and associated educational attainment levels likely contributed to these results.

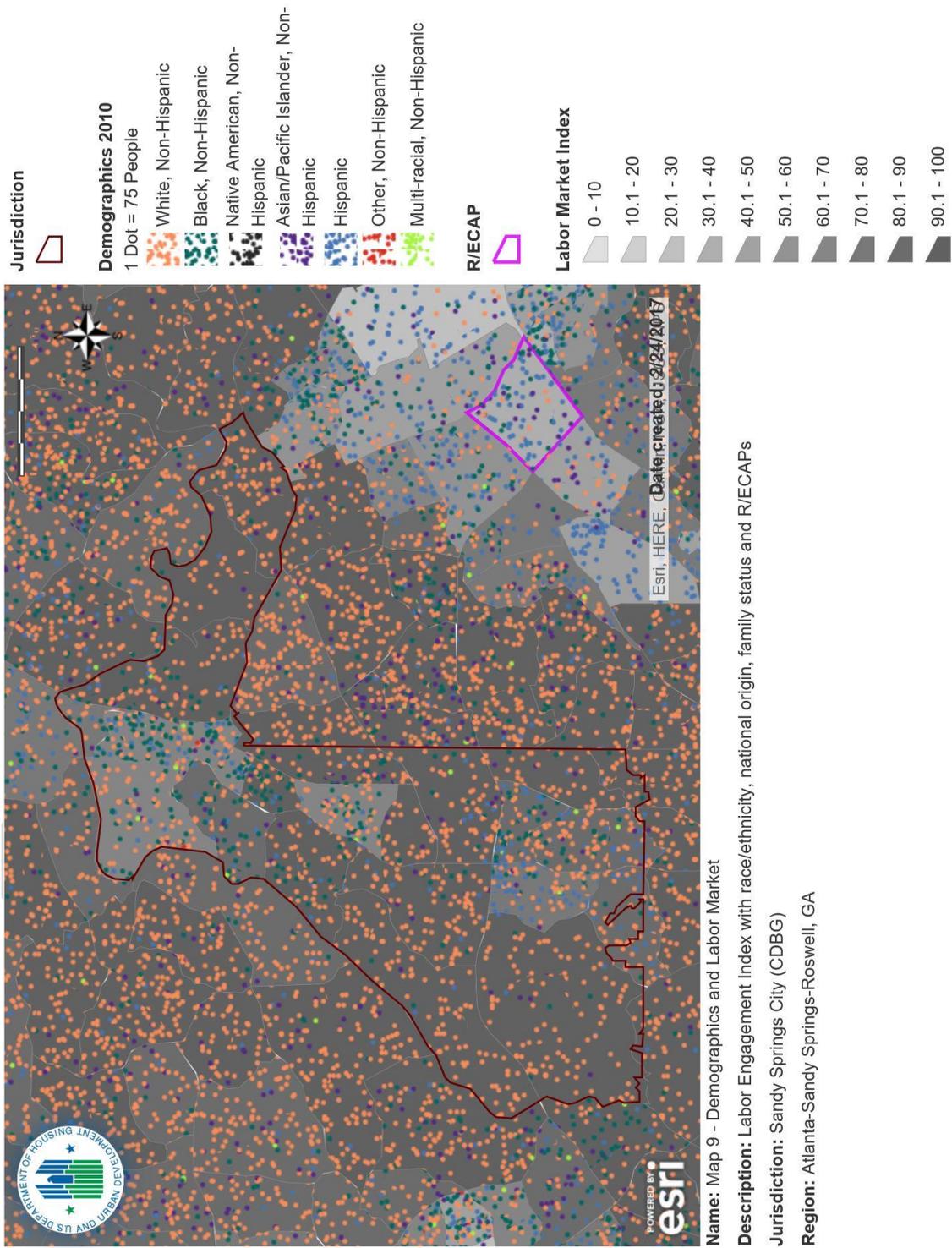
With regard to family status, Figures 16 and 17 show that the areas of the City that have less access to labor markets generally have higher percentages of households with children (between 50% to 70%), compared to those areas that show greater access to labor associated with fewer households with children, namely just 35%.

During community meetings, participants noted that affordable childcare services are lacking in the City; it may mean that modest income households make the financial calculation that net wage income is not sufficient to cover the costs of childcare. According to the Georgia Department of Early Care and Learning, the average annual cost in 2016 was \$7,644 for an infant and for toddlers, \$6,400 in the State of Georgia. The State subsidy program provides assistance to only a fraction of qualified households (40,000). HUD considers childcare as affordable when it costs 10% or less of the household income; by that reference, a household would need to earn around \$70,000 to afford daycare for one child.

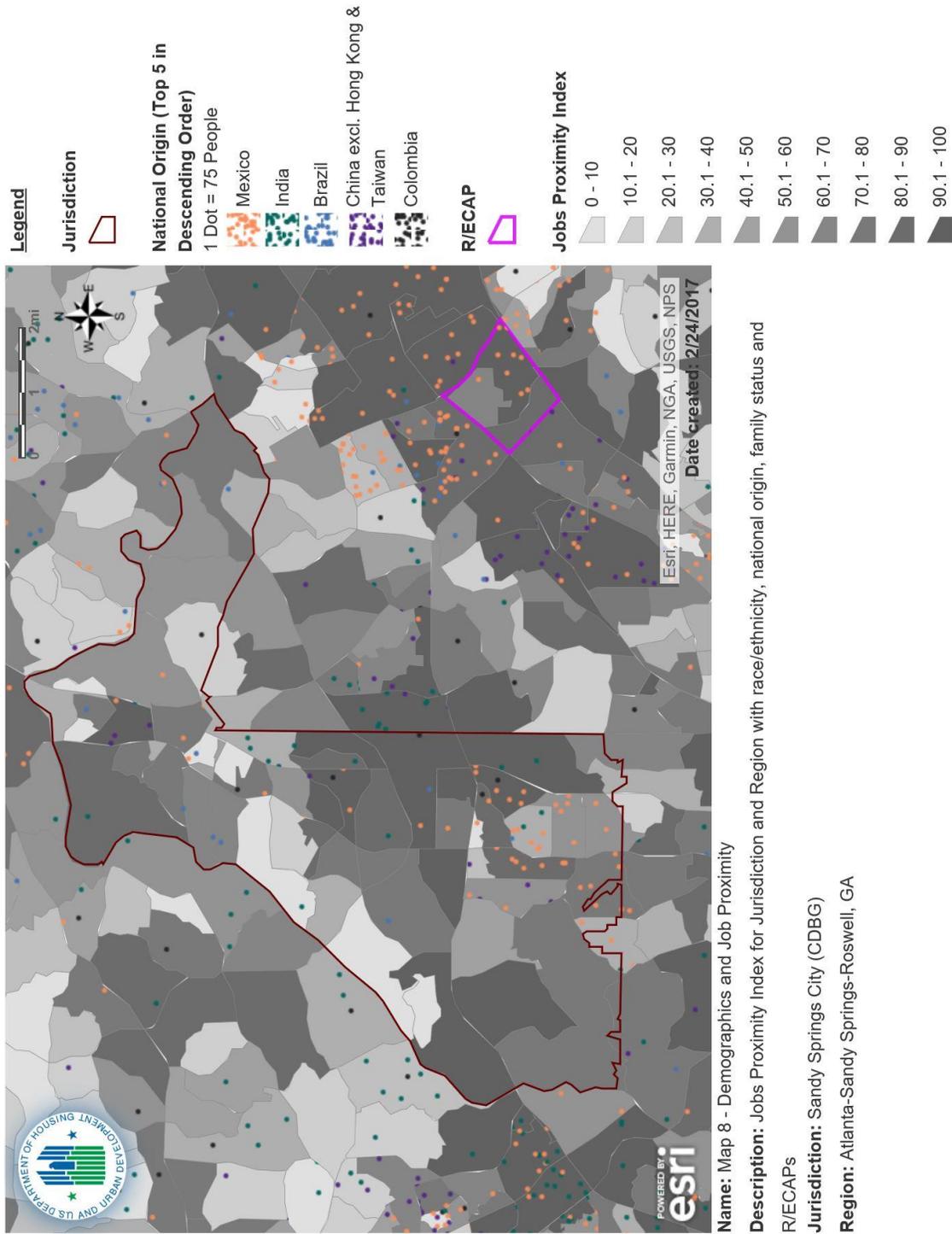
**Figure 12 –Job Proximity Index and Race/Ethnicity in the City of Sandy Springs**



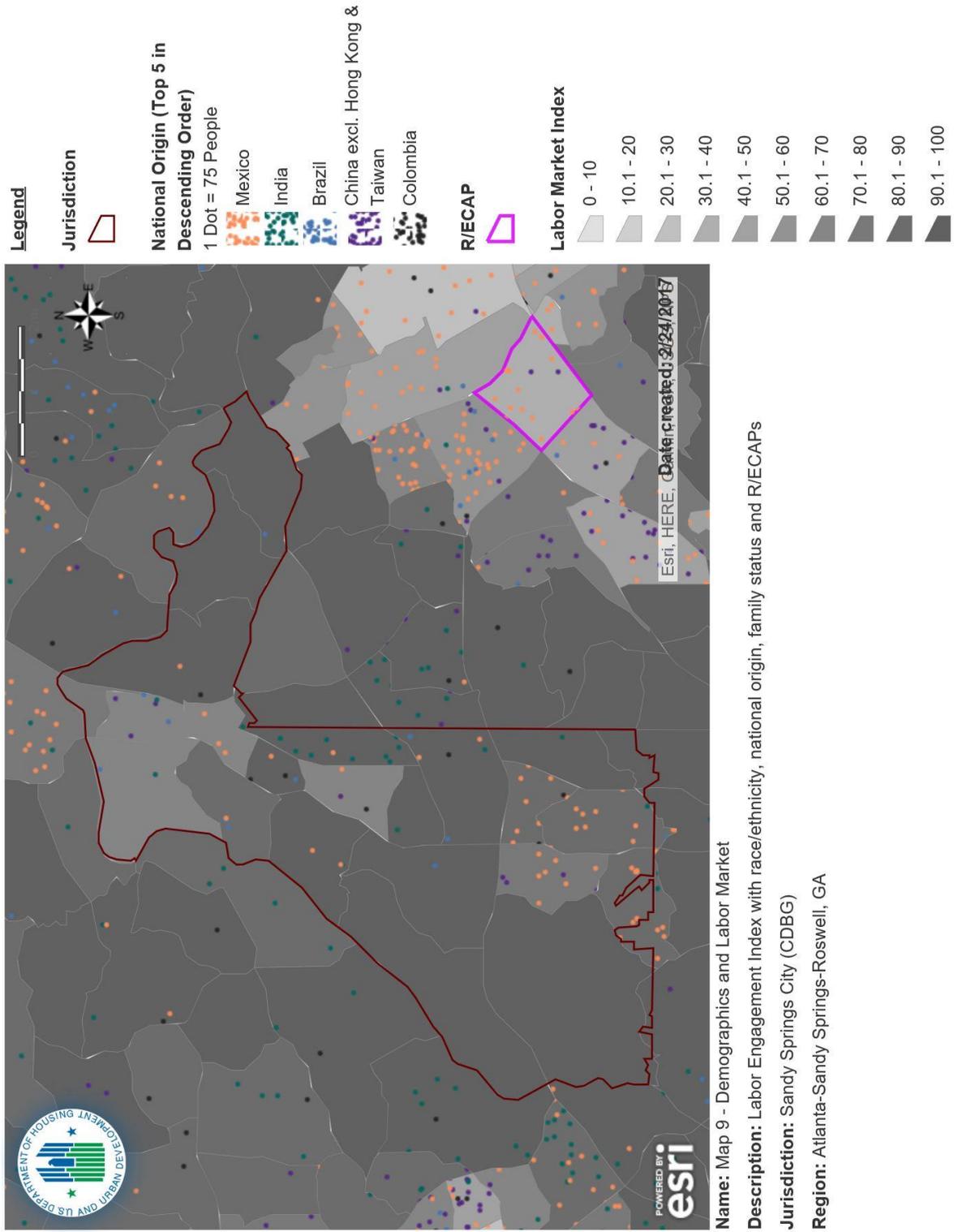
**Figure 13 – Labor Market Index and Race/Ethnicity in the City of Sandy Springs**



**Figure 14 --Job Proximity Index and National Origin in the City of Sandy**

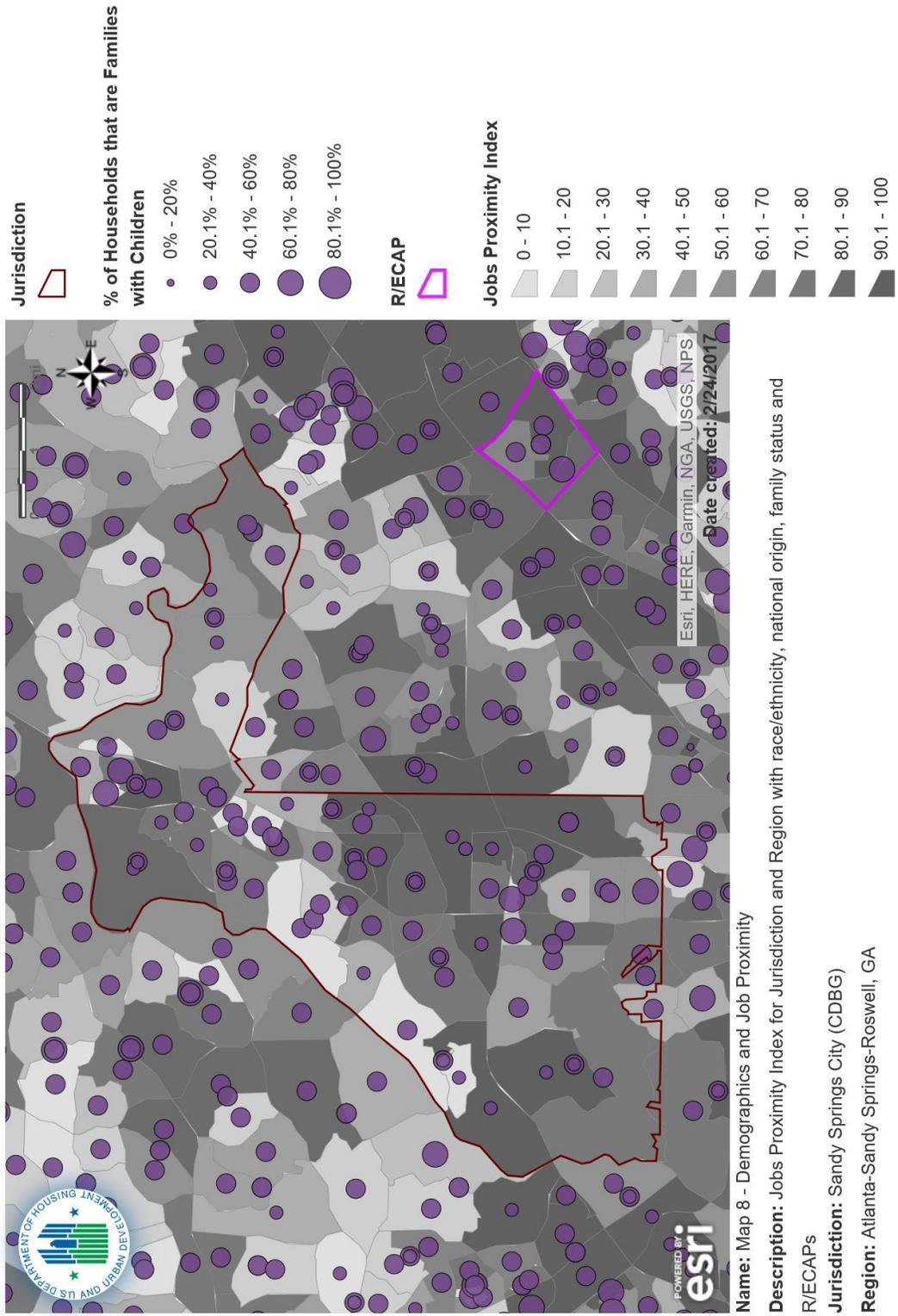


**Figure 15– Labor Market Index and National Origin in the City of Sandy Springs**

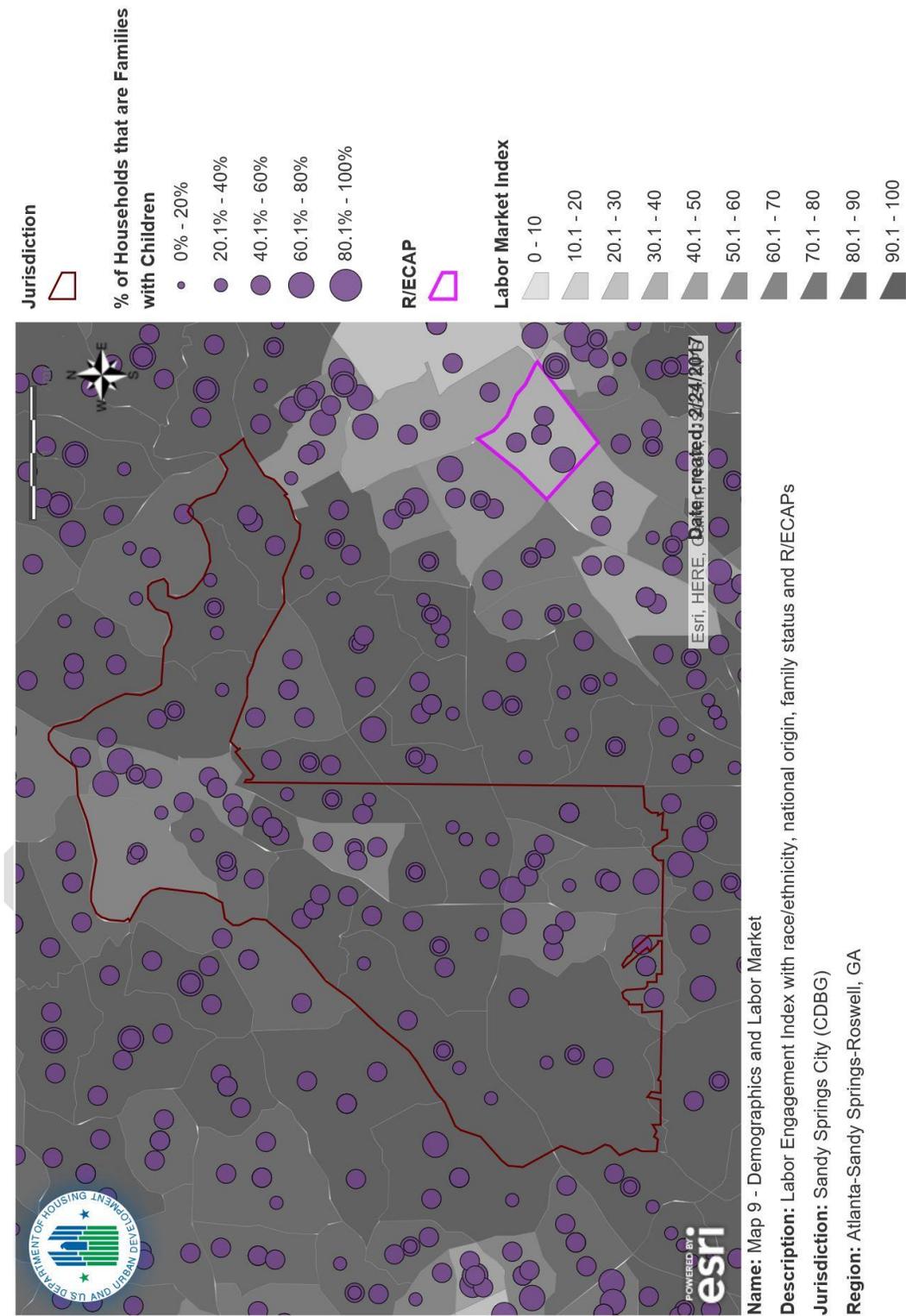


**Name:** Map 9 - Demographics and Labor Market  
**Description:** Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs  
**Jurisdiction:** Sandy Springs City (CDBG)  
**Region:** Atlanta-Sandy Springs-Roswell, GA

**Figure 16—Job Proximity Index and Households with Children in the City of Sandy Springs**



**Figure 17–Labor Market Index and Households with Children in the City of Sandy Springs**



### **c. Transportation Opportunities**

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#### **i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.**

Public transportation in the City consists of both rail and bus, available primarily along commercial corridors and within activity centers. Social services are located in close proximity to the Roswell Road corridor, and public schools are located throughout the City with a focus on neighborhood access. Multiple banks and other lending institutions are located within each of the activity centers in the City: Powers Ferry Landing, along the Roswell Road corridor, and within the Perimeter Center area. Health services are available throughout Sandy Springs, with most concentrated in activity centers along Roswell Road and within the medical center at the I-285 perimeter, where MARTA's Medical Center Station is located. Forty percent of the hospital beds in the Atlanta region are located within Sandy Springs. The three hospitals in the City are all located in close proximity to the Peachtree Dunwoody and Johnson Ferry Road intersection, all within walking distance of the MARTA Medical Center train station.

Additionally, MARTA operates a special door-to-door transit service within Sandy Springs and the region for persons with disabilities.

Within the AFFH Data Documentation, HUD describes how the Low Transportation Cost Index (Table 8) measures cost of transportation and proximity to public transportation by neighborhood. The Index values range from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood. Also, the Transit Trips Index (Table 8) measures how often low-income families in a neighborhood use public transportation. The higher the value, the greater the number of trips taken, thus indicating the more often a neighborhood utilizes public transit.

Both indexes are based on estimates of transportation costs for a family that meets the following description: a 3-person, single-parent family with income at 50% of the median income for renter for the region. HUD data (Figures 19 through 24) displays the Low Transportation Cost Index based on racial/ethnicity, national origin, and households with children for both the City and the region. Lighter shading indicates areas of lower opportunity, and darker areas indicate areas of higher opportunity.

At the City level, public transportation appears to be accessible and used almost equally by all racial/ethnic groups, with values ranging from 82 to 88, with Black and Hispanic population having the highest scores of 88. For the population below the federal poverty line, all race/ethnic groups show scores above 81, ranging from 81 to 89. Again, Blacks and Hispanics have the greatest use and accessibility to public transportation having scores of 89. The Low Transportation Cost Index at the City level shows that Blacks and Hispanics often live closer to public transportation, using public transportation more out of the total population.

Population maps show that Black and Hispanic groups live in high concentration along the Roswell Road corridor, which provides access to MARTA bus stops. This is evident in Figures 19 through 24, which show higher Low Transportation Cost along Roswell Road. This is reflected in Figures

19 through 24, which show darker shading along all Roswell Road, indicating higher access to transportation use and lower costs.

At the regional level, Hispanics and Asians use public transportation more often, as indicated by index scores of 71 and 68, respectively. The rest of the groups have transit index scores ranging from 59 to 69. For the population below the federal poverty line, Hispanics and Asians have the greatest accessibility and use of public transportation, with comparable scores of 74 and 75, while the rest of the racial/ethnic groups have scores ranging from 57 to 71. The Low Transportation Cost Index at the regional level, also shows Hispanic and Asian populations as being the groups that live closer to public transportation and comparatively lower public transportation costs.

Even when controlling for income at the City and regional level, Black, Hispanic and Asian populations continue to more often utilize public transit and have the lower cost of transportation. In general, Black and Hispanic residents of Sandy Springs have easier access to transit than the region, and at a lower cost.

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**Table 8 – (Subsection) Transit and Low Transportation Opportunity Indicators by Race/Ethnicity in the City and Region.**

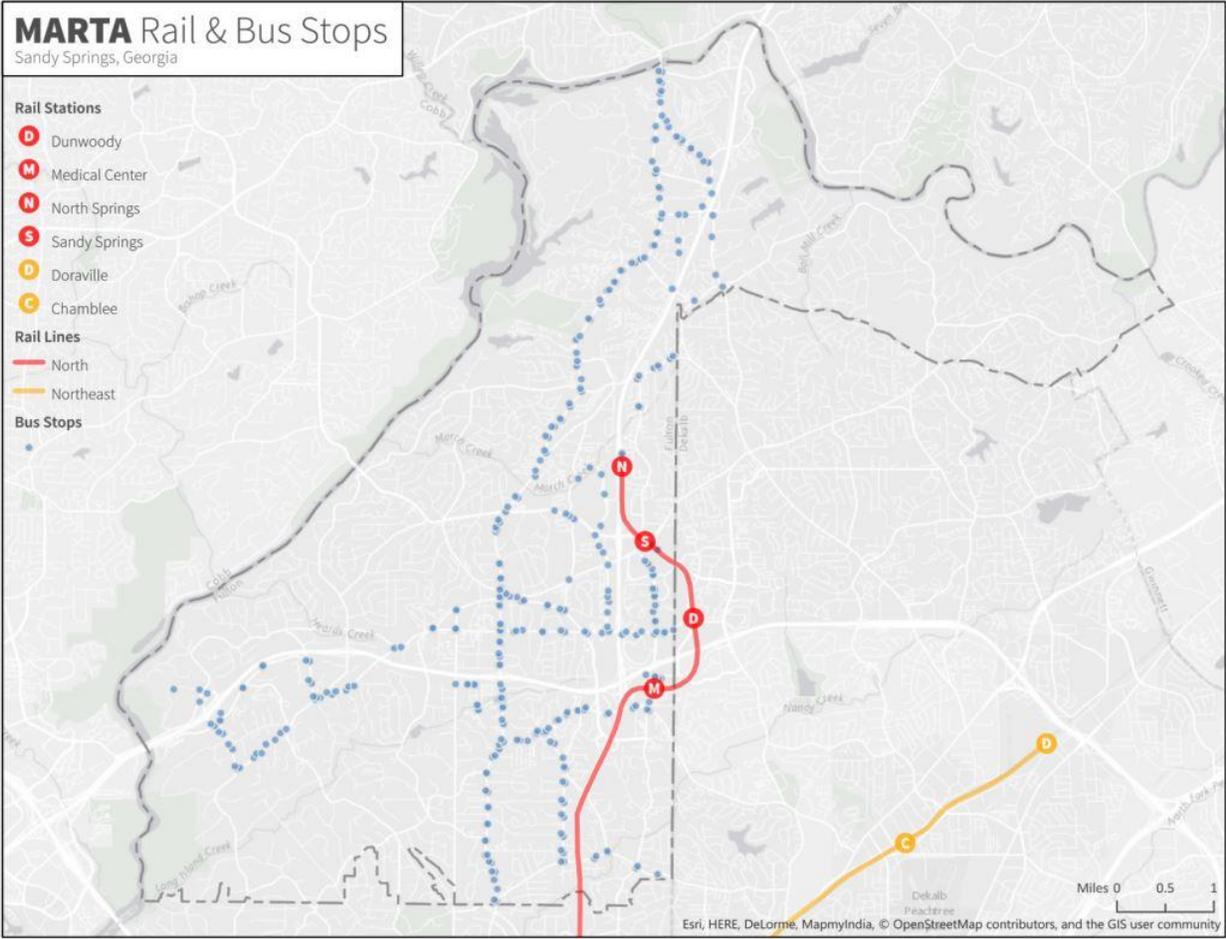
<b>Table 8 - Opportunity Indicators by Race/Ethnicity</b>		
<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>
White, Non-Hispanic	82.56	57.75
Black, Non-Hispanic	88.78	69.65
Hispanic	88.07	68.07
Asian or Pacific Islander, Non-Hispanic	86.32	66.1
Native American, Non-Hispanic	86.04	65.36
<b>Population below federal poverty line</b>		
White, Non-Hispanic	84.31	62.28
Black, Non-Hispanic	89.21	70.38
Hispanic	89.15	69.52
Asian or Pacific Islander, Non-Hispanic	84.06	61.7
Native American, Non-Hispanic	81.11	55.4
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>		
White, Non-Hispanic	58.3	34.86
Black, Non-Hispanic	68.3	43.71
Hispanic	70.82	48.3
Asian or Pacific Islander, Non-Hispanic	71.05	45.34
Native American, Non-Hispanic	61.84	39.04
<b>Population below federal poverty line</b>		
White, Non-Hispanic	57.16	36.88
Black, Non-Hispanic	71.42	48.93
Hispanic	73.77	52.5
Asian or Pacific Islander, Non-Hispanic	74.51	52.73
Native American, Non-Hispanic	63.5	42.33
Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA		

Source: Location Affordability Index (LAI) data, 2008 -2012.

**ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of reliable, affordable transportation connection between their place of residence and opportunities?**

Based on the maps provided by HUD and the MARTA stations and bus stops map below (Figure 18), frequent north-south options for accessing transit exist, but residents in northeastern and western Sandy Springs do not have easy access to public transportation. These predominantly white areas have no MARTA bust stop, compared to the also, predominantly white southwestern neighborhoods, enjoying high numbers of bus and rail options.

**Figure 18 -Marta Stops and Stations in the City of Sandy Springs**



**iii. Describe how the jurisdiction’s and region’s policies, such as public transportation router or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.**

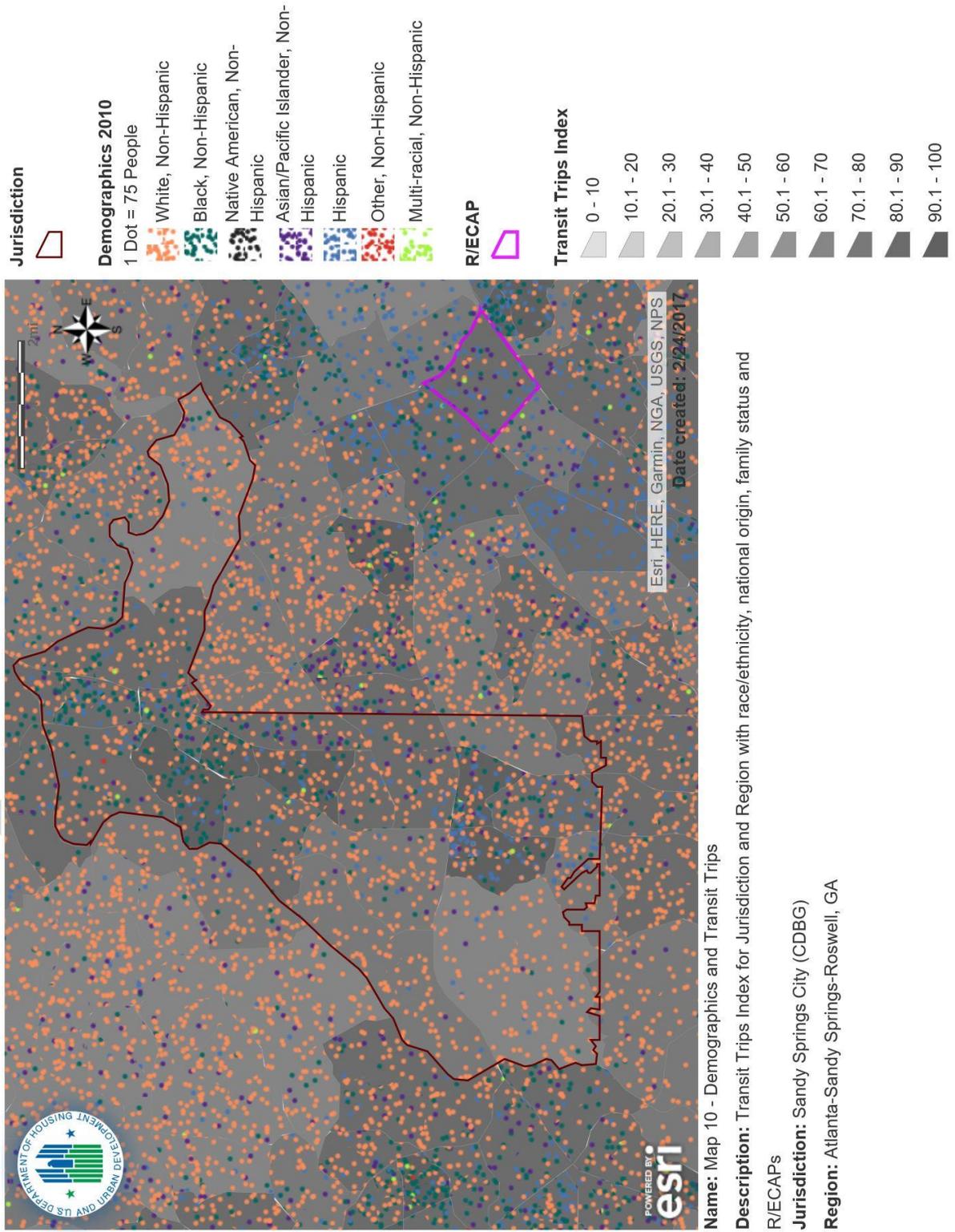
The City of Sandy Springs has three principal bus routes. Route 87, which is Roswell Rd/Morgan Falls, operates between the Dunwoody and North Springs transit rail stations along Hammond Drive, Roswell Road, Dunwoody Place, and Northridge Road. This route offers weekday services to the North Springs stations via GA-400. The hours of operation during the weekdays are from 5:00 a.m. to 1:30 a.m., on Saturdays the service runs from 6 a.m to 12 a.m., on Sundays goes from 6 a.m to 11 p.m.

Route 148 (Sandy Springs./Riveredge Pkwy) provides east and westbound connections, from Sandy Springs Station along Perimeter Center West, Mt. Vernon Highway, Johnson Ferry Road, Roswell Road, Powers Ferry Road, New Northside Drive, Interstate North Pkwy., to Riveredge Parkway, offered only during the weekdays from 6 a.m. to 7 p.m. This might present a challenge for persons who work 2<sup>nd</sup> and 3<sup>rd</sup> shifts and/or on weekends.

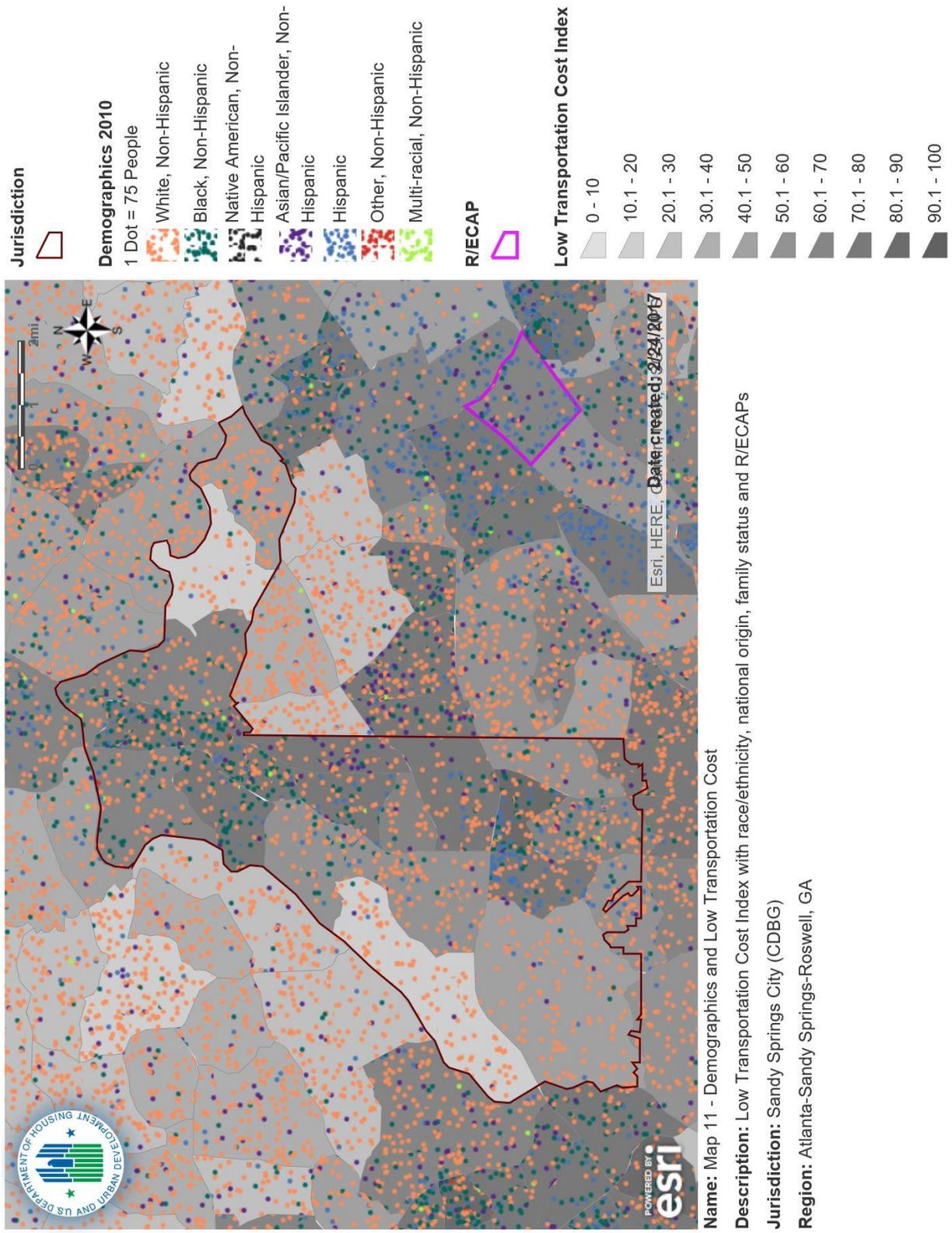
The third route is Route 5, (Piedmont Road/Sandy Springs) operates between Lindbergh Center and Dunwoody stations along Piedmont Road, Roswell Road, Johnson Ferry Road, and Hammond Drive. Route 5 offers service Monday through Sunday during the same hours as Route 87. MARTA is completing a survey of service routes, to be completed by 2018 and held a series of neighborhood public engagement meetings throughout 2017 to inform the study.

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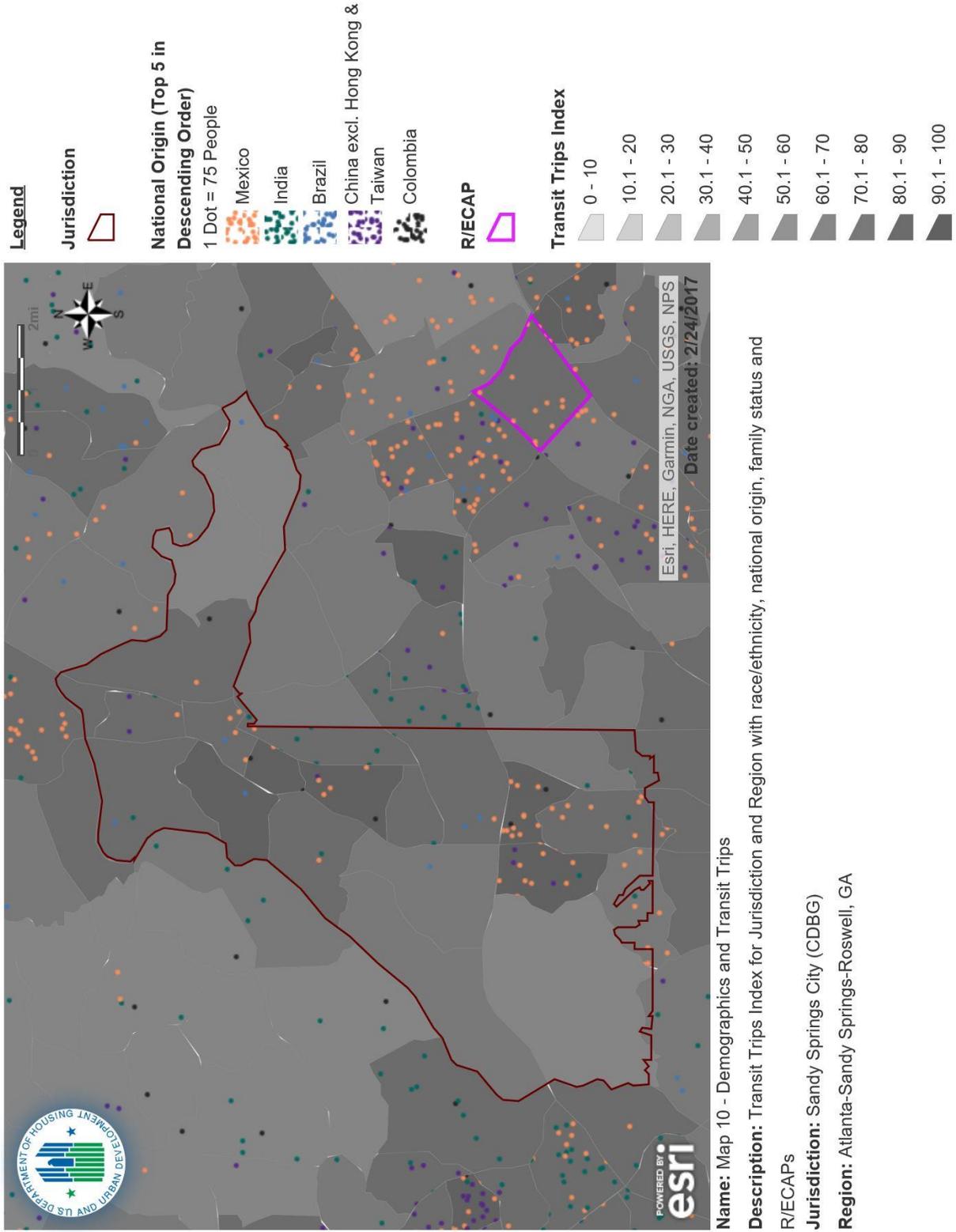
**Figure 19 – Transit Trips and Race/Ethnicity in the City of Sandy Springs**



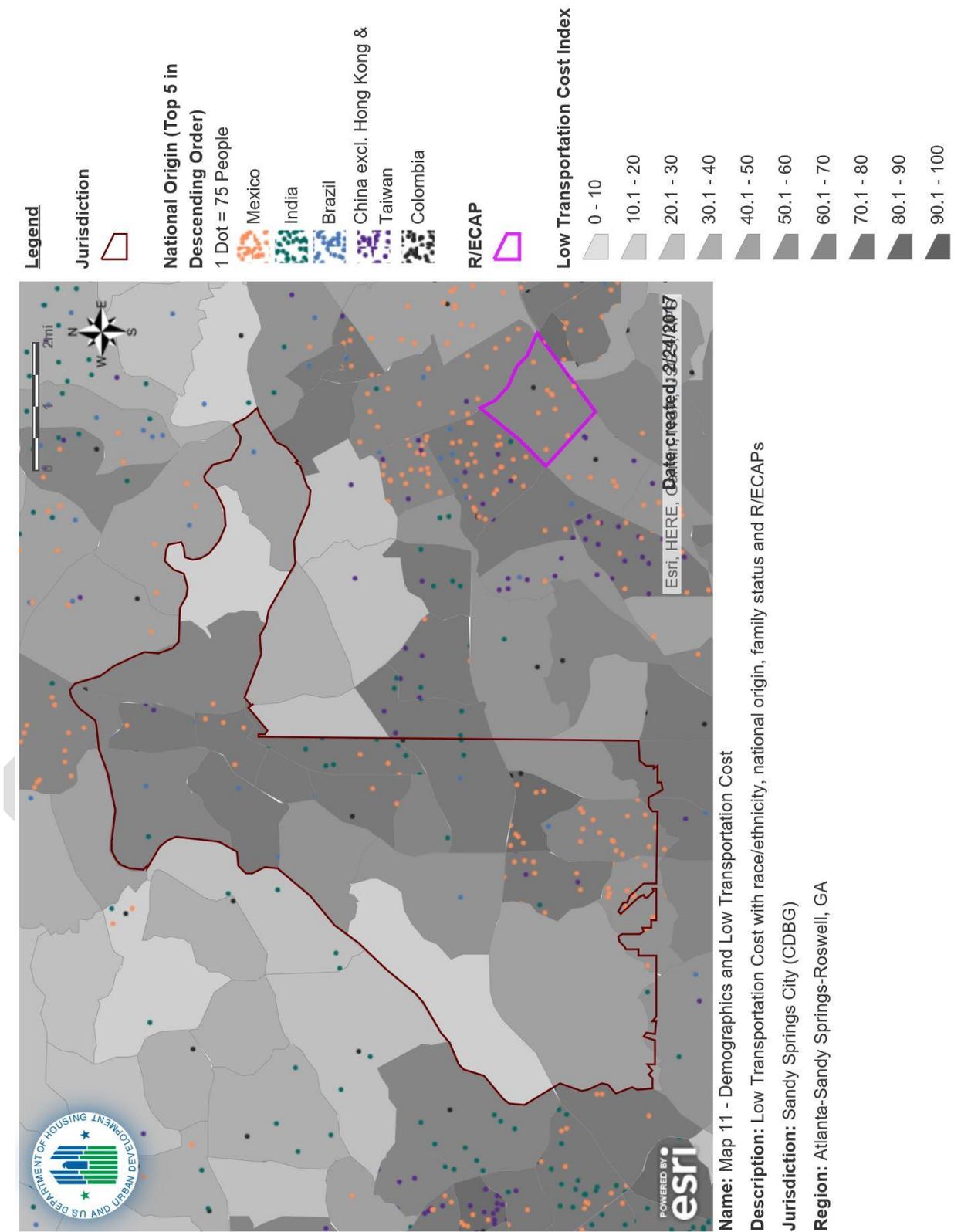
**Figure 20—Low Transportation Cost and Race/Ethnicity**



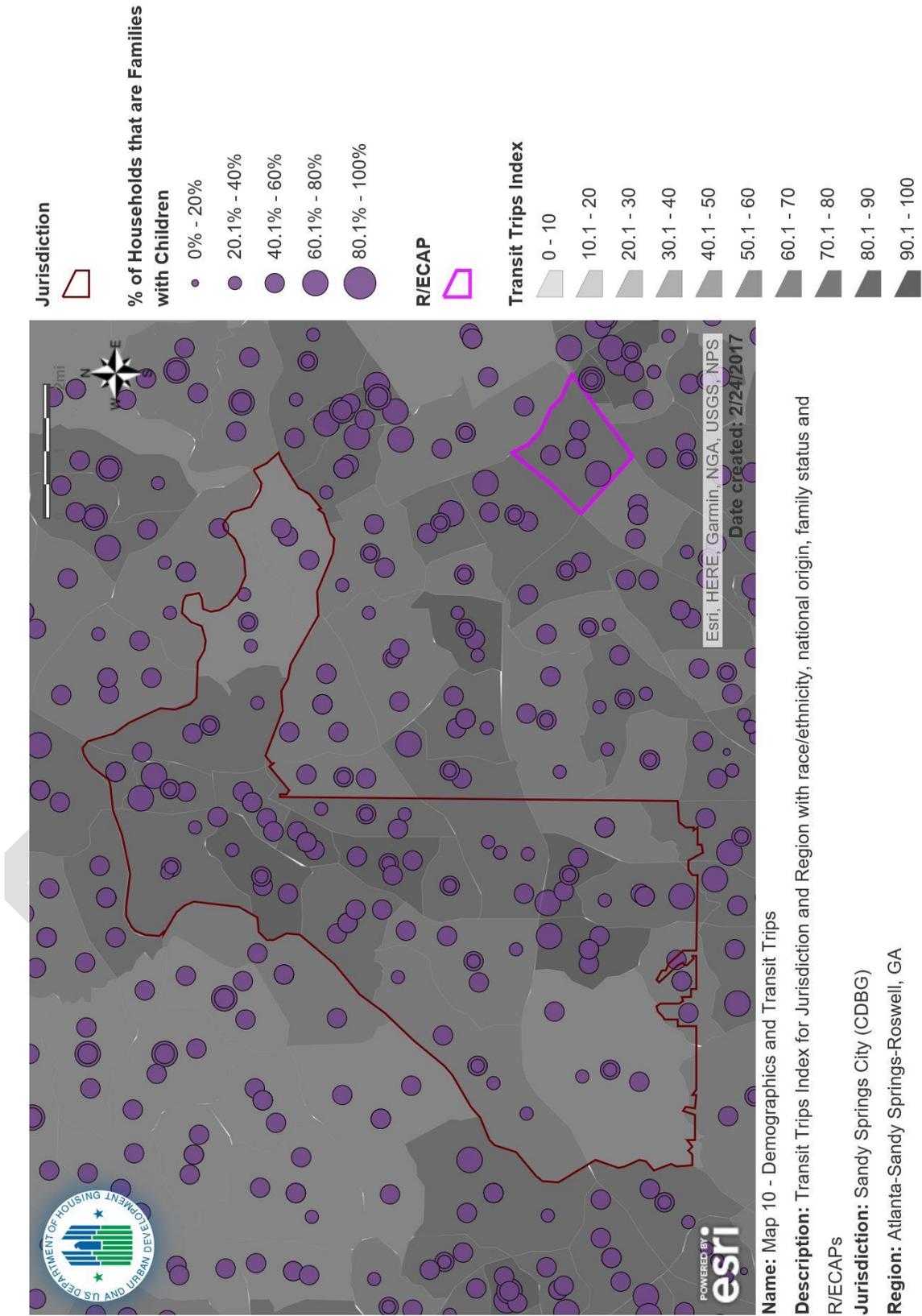
**Figure 21 –Low Transportation Cost and National Origin in the City of Sandy Springs**



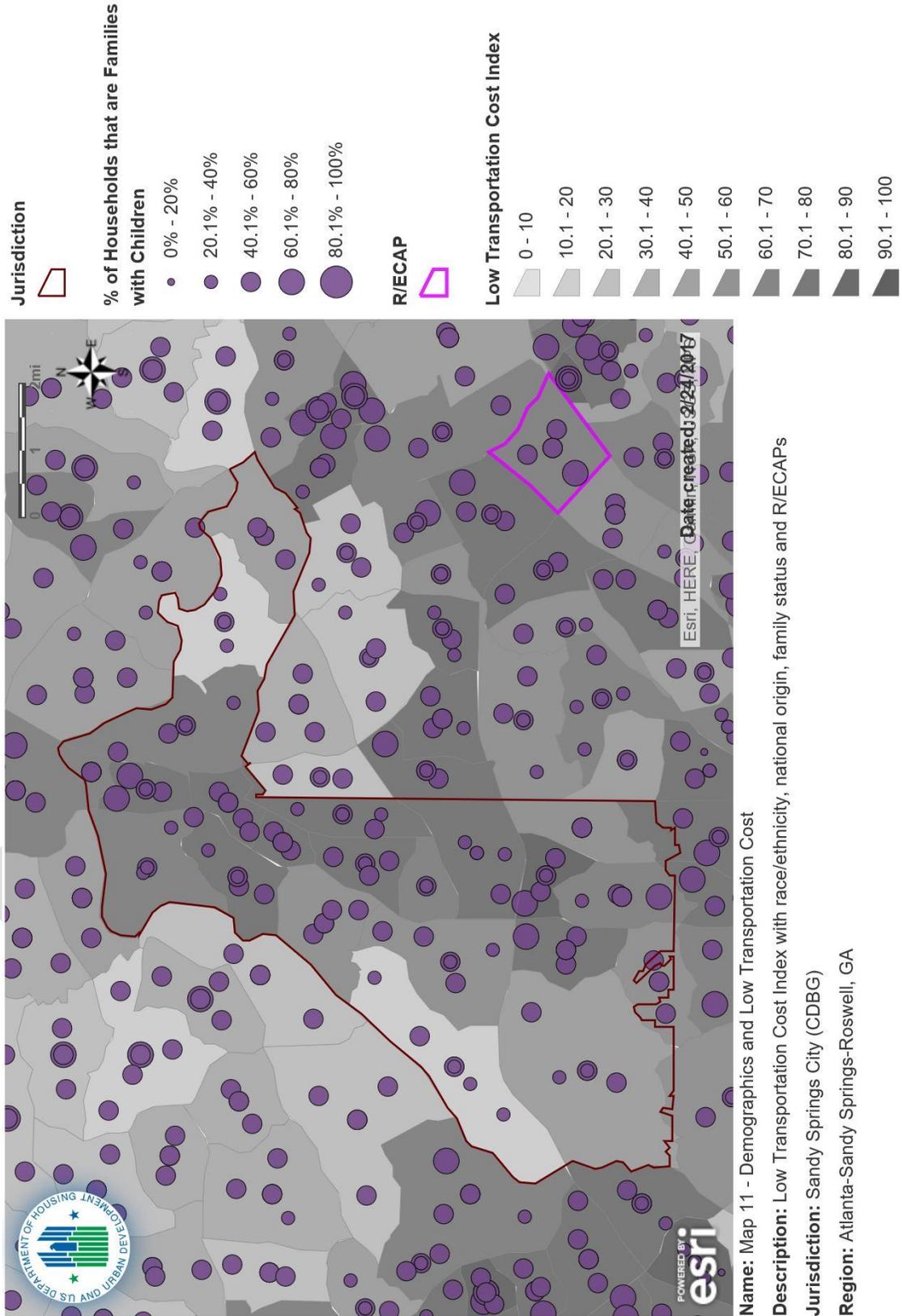
**Figure 22 –Low Transportation Cost and National Origin**



**Figure 23 – Transit Trips and Households with Children in the City of Sandy Springs**



**Figure 24 –Low Transportation Cost and Households with Children**



#### d. Low Poverty Exposure Opportunities

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- i. **Describe any disparities in exposure to poverty by protected class groups.**
- ii. **What role does a person's place of residence play in their exposure to poverty?**
- iii. **Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?**

The Federal government establishes the poverty rate and updates that figure annually with adjustments for household size. In 2000, the poverty rate for a family of four was \$17, 603. In 2009, that rate was adjusted to \$22,050. In 2017, the poverty rate for a family of four has been adjusted to \$24,600 According to the 2011-2015 ACS estimates; there are approximately 10,767 or 14% of families with children under 18 years of age who live below the federal poverty level in the City of Sandy Springs.

The Low Poverty Index provided by the HUD in Table 8 uses rates of family poverty by household to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. For this analysis, HUD also provides maps that indicate geographic distribution of the Low Poverty Index by Race/Ethnicity, national origin, and households with children. Lighter shading indicates areas of lower opportunity and darker shading indicates areas of higher opportunity.

As seen in Table 8 Hispanics in Sandy Springs experience the highest instance of poverty with a score of 47 on the Low Poverty Index; Black populations follow with a moderately high exposure to poverty as indicated by the index value of 52. Native Americans rank third with a score of 58. White populations have less exposure to poverty having a score of 68, and Asian/Pacific Islander populations show the least exposure to poverty at 70.

Mapping these indicators of Low Poverty Index with Race/Ethnicity, national origin, and households with children shows that the Census tracts 010119, 010118, 010117, 010112, 010113, 010114 have the greatest combine effect of protected classes experiencing the greatest contact with poverty (Figure 25-27) and geographically concentrated areas of White populations the least (Index value 68).

Census tracts 010119 (area surrounded the North river shopping Center), 010118 (Dunwoody Springs Elementary School), and 010117 (Morgan's Landing area), have a Low Poverty Index of 16 and 12, respectively, indicating **very high exposure to poverty**. These areas have also been identified as a fairly racially integrated neighborhood. Additionally, 40% - 60% of households in these areas live below the poverty level. These areas are also known to be diverse with many foreign-born populations from Mexico, India, and Brazil. Households that live in these areas also have greater access to jobs and public transportation, as well as moderate access to proficient schools. In addition, 35% of households in these three Census tracts are families with children.

Census Tracts 010112 (Fountain Oaks Shopping Center), 010113 (Perimeter Circle apartments), and 010114 (area surrounding the High Point Elementary School) have lighter shading, greater

exposure poverty. Census Tract 010112 scores a Low Poverty Index of 32, while Census Tract 010113 scores a low poverty index of 25 and Census Tract 010114 scores a value of 40. These low scores represent higher exposure to poverty. Census Tracts 010212 and 010113, particularly the area between Lake Forrest Drive and Glenridge Drive near the Fountain Oaks Shopping Center, have been identified as segregated areas where 80% of the community is Hispanic, 71% of the foreign-born population is of Mexican national origin, and approximately 42% of the households are families with children. These areas have been characterized as having low job proximity, limited school proficiency, and higher access to transportation, and 40% to 60% of households in these two areas live below the poverty level. The identified areas are known to have a high number of multi-family rental units and also are the areas with the most minority concentration.

A person's place of residence has a great impact on their exposure to poverty. Even though the analysis has shown that no R/ECAPs Census tracts exist in the City, one can identify areas where households that live below the federal poverty level demonstrate trends toward segregation, limited access to opportunities, and one or more housing problems, like cost-burdened conditions.

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**Table 8 – (Subsection) Low Poverty Opportunity Indicator by Race/Ethnicity in the City and Region.**

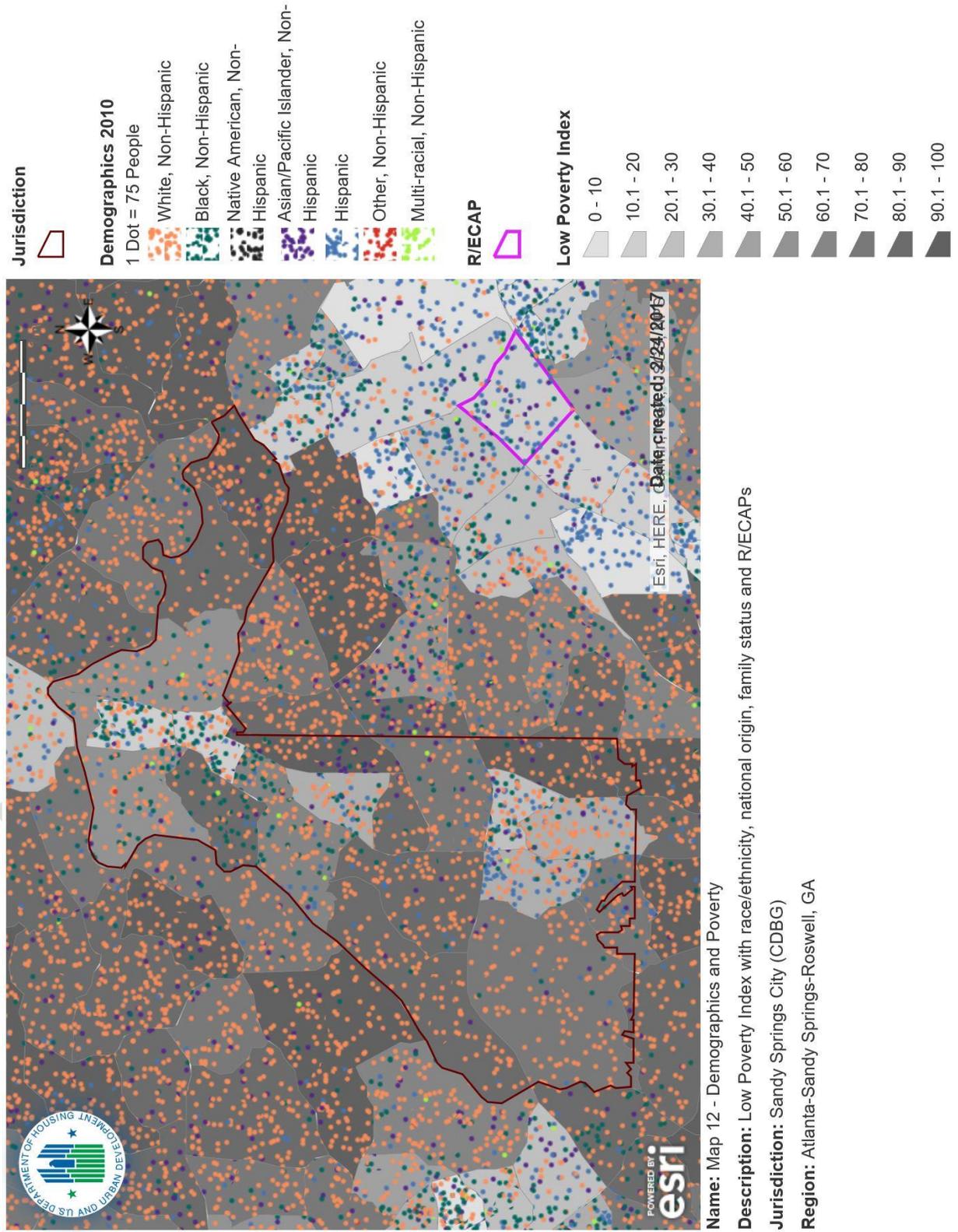
<b>Table 8 - Opportunity Indicators by Race/Ethnicity</b>	
<b>(Sandy Springs City, GA CDBG)</b>	
<b>Total Population</b>	<b>Low Poverty</b>
White, Non-Hispanic	68.19
Black, Non-Hispanic	52.42
Hispanic	47.21
Asian or Pacific Islander, Non-Hispanic	69.32
Native American, Non-Hispanic	57.80
<b>Population below federal poverty line</b>	
White, Non-Hispanic	61.73
Black, Non-Hispanic	40.98
Hispanic	39.90
Asian or Pacific Islander, Non-Hispanic	68.10
Native American, Non-Hispanic	86.30
<b>(Atlanta-Sandy Springs-Roswell, GA)</b>	
<b>Total Population</b>	
White, Non-Hispanic	59.35
Black, Non-Hispanic	38.43
Hispanic	38.88
Asian or Pacific Islander, Non-Hispanic	57.60
Native American, Non-Hispanic	48.54
<b>Population below federal poverty line</b>	
White, Non-Hispanic	47.46
Black, Non-Hispanic	27.64
Hispanic	28.15
Asian or Pacific Islander, Non-Hispanic	48.37
Native American, Non-Hispanic	37.79

Source: American Community Survey (ACS), 2009-2013.

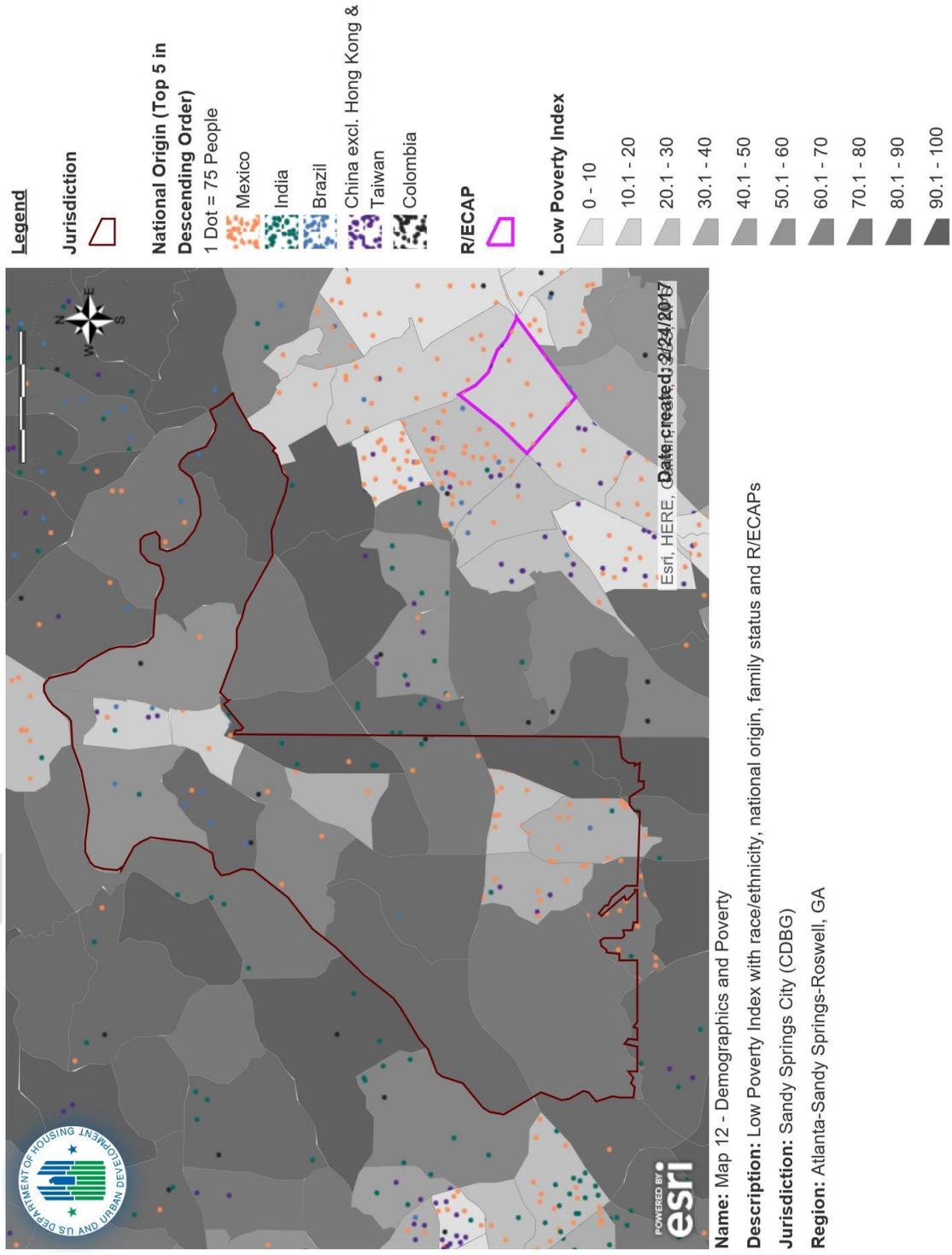
**i v. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.**

No other relevant information is available at this time.

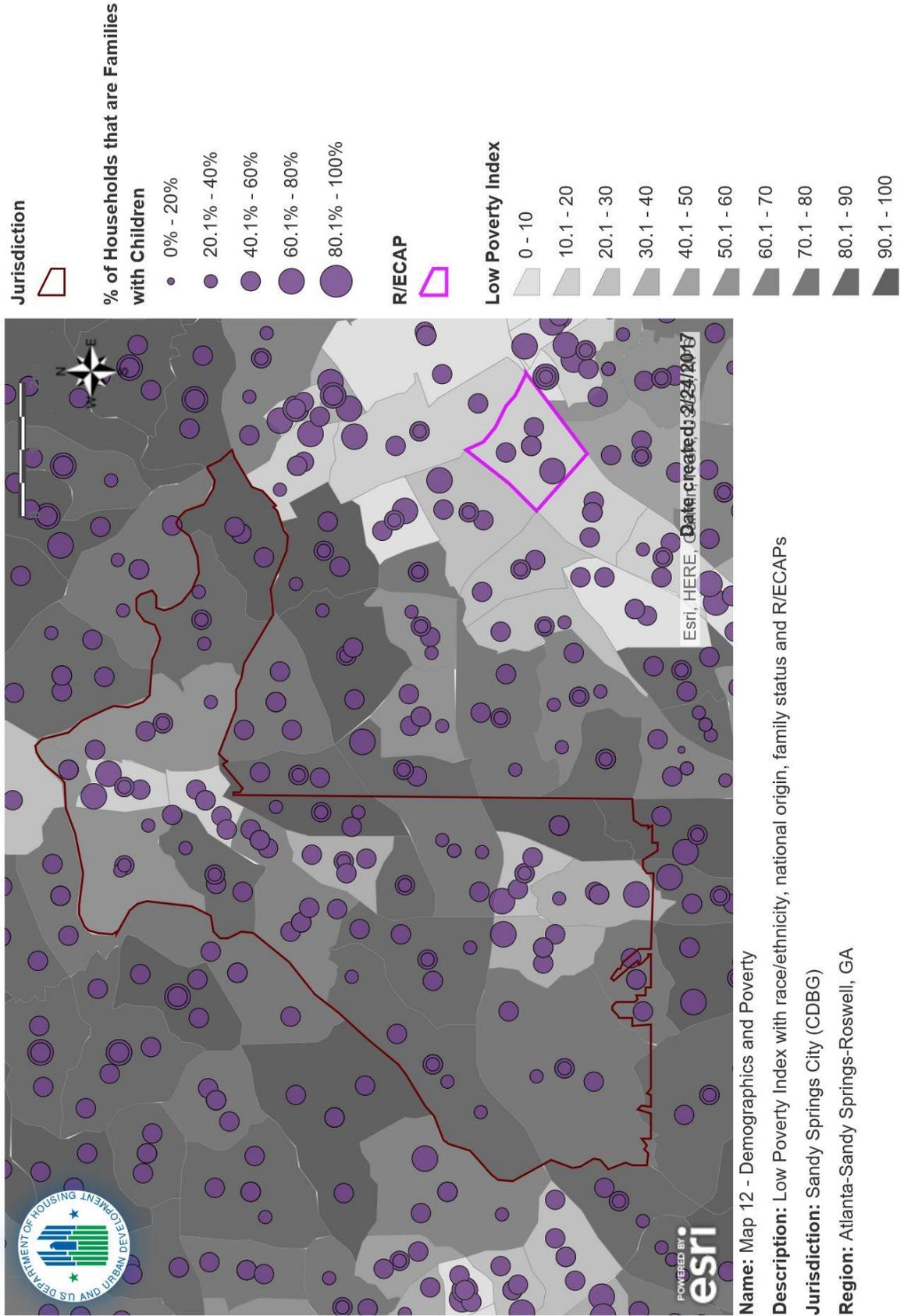
**Figure 25 –Low Poverty Index and Race/Ethnicity in the City of Sandy Springs**



**Figure 26 – Low Poverty Index and National Origin in the City of Sandy Springs**



**Figure 27 –Low Poverty Index and Households with Children in the City of Sandy Springs**



**Name:** Map 12 - Demographics and Poverty

**Description:** Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

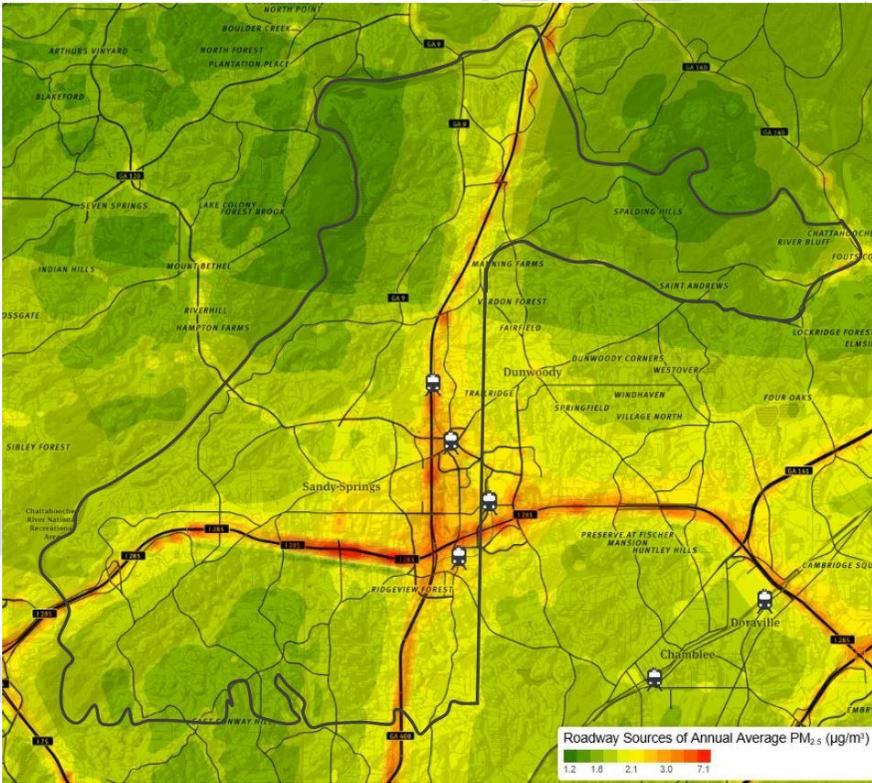
**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

e. Environmentally Healthy Neighborhoods Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class group.

The map depicted below illustrates air quality in the City of Sandy Springs, as measured by particulate matter concentration. According to the ARC, “particulate matter (PM) is a term for particles and liquid droplets suspended in the air. PM originates from a variety of sources including diesel trucks, power plants, wood stoves and industrial processes. Health risks range from mild respiratory and cardiovascular issues to premature death from heart and lung disease.”



(Source: Atlanta Regional Commission, AREES Interactive Air Quality Map )

Since first identified as a “non-attainment” region in terms of meeting federal air quality standards, the Atlanta region has dramatically improved its air quality; in 2016 the EPA determined that all counties were complying with the standards for particulate matter pollution. Still, roadways remain the most significant source of air pollution. With major transportation corridors such as Roswell Road, I-285 and GA-400, the air quality in Sandy Springs can be low for many residents, especially those near concentrated areas of vehicular emissions, as shown by the yellow, orange and red areas of the map, above.

The Environmental Health Index provided by Table 8 and Figures 28 through 30 measures exposure to air quality carcinogenic, respiratory and neurological toxins by neighborhood in Sandy City of Sandy Springs AFH

Springs, based on Race/Ethnicity, national origin, and households with children. Values range from 0 to 100. Higher values indicate a better environmental quality. Lighter shading indicates areas of lower quality and darker shading indicates areas with greater access to healthy environments.

The Environmental Health Index score shows that all groups in Sandy Springs experience a similar level of exposure to environmental toxins with scores around 30. Asians have the highest score of 32, that is, the least exposure compared to other groups; Black and White populations have essentially the same score of 25. Native Americans and Hispanics carry an index value of 24 and 23, indicating these groups experience only slightly greater exposure to air pollutants.

Sandy Springs populations below the federal poverty line share a similar level of exposure to air pollutants, although again, Asian populations maintain the lowest exposure with an index value of 34, while Whites and Native Americans in this group have slightly greatest exposure (values of 24 and 25).

The Regional Environmental Index reveals very similar values across all racial and ethnic groups. The White population has the highest score of 32, followed by Native Americans with a score of 28. Hispanics are third with a score of 25, Asians are fourth with a score of 23, and the Black population is the group with the lowest score (22), meaning that this is the group experiencing the most exposure to toxins and air pollutants, albeit at only a ten point difference to that of Whites.

Analysis of populations below the federal poverty line within the region show little difference from those groups above the poverty level.

**Table 8 – Environmental Health Index Opportunity Indicators by Race/Ethnicity in the City and Region.**

<b>Table 8 - Opportunity Indicators by Race/Ethnicity</b>	
<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>	<b>Environmental Health Index</b>
White, Non-Hispanic	24.76
Black, Non-Hispanic	24.89
Hispanic	23.26
Asian or Pacific Islander, Non-Hispanic	31.69
Native American, Non-Hispanic	24.13
<b>Population below federal poverty line</b>	
White, Non-Hispanic	25.42
Black , Non-Hispanic	27.15
Hispanic	27.04
Asian or Pacific Islander, Non-Hispanic	34.44
Native American, Non-Hispanic	23.98
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>	
White, Non-Hispanic	32.29
Black , Non-Hispanic	22.01
Hispanic	24.86
Asian or Pacific Islander, Non-Hispanic	23.21
Native American, Non-Hispanic	28.11
<b>Population below federal poverty line</b>	
White, Non-Hispanic	33.14
Black , Non-Hispanic	20.17
Hispanic	22.94
Asian or Pacific Islander, Non-Hispanic	19.46
Native American, Non-Hispanic	28.7
Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA	

Source: National Air Toxics Assessments (NATA) data, 2005.

**ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?**

As reported above, Hispanics experience less access to environmentally healthy neighborhoods compared to other racial/ethnic groups. For the population below of the federal poverty line, the White population experiences slightly greater exposure to environmental toxins and pollutants.

Out of the total population within the region, Blacks population experience least access to environmentally healthy neighborhoods; whereas, for populations under the federal poverty line within the region, Asians seem to be the racial/ethnic group that experiences the greatest exposure to environmental toxins and pollutants.

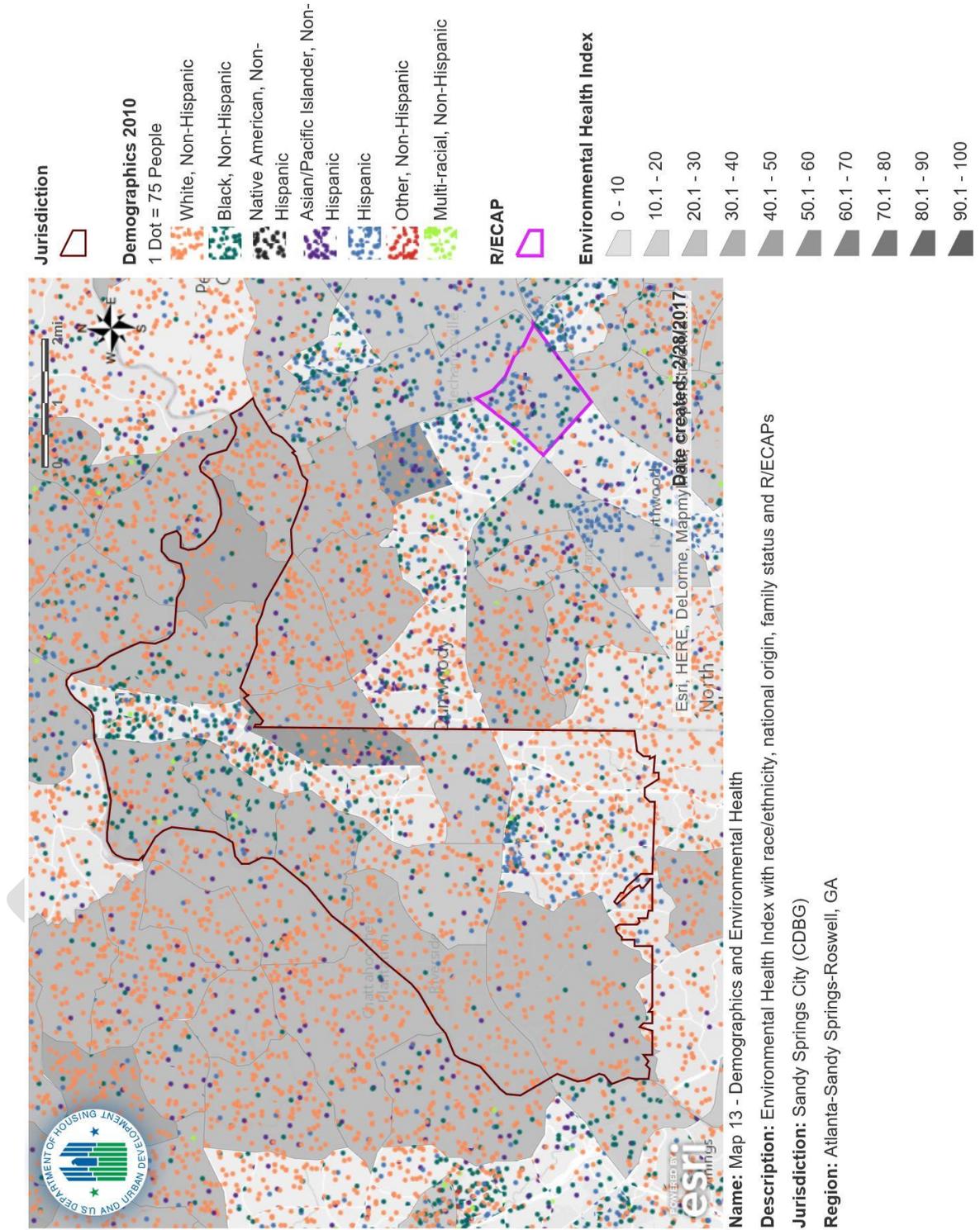
One can assume that those neighborhoods in proximity to major corridors, such as Roswell Road, I-285, and GA-400, would have more pollution and lower air quality. The AREES Interactive Air Quality Map supports this assumption by depicting a higher degree of PM in neighborhoods along major roadways. The Environmental Health Opportunity maps (Figures 28 through 30) show slightly lower scores, indicating slightly higher exposure to poor air quality, in neighborhoods that are primarily residential and that have no proximity to potential environmental hazards.

**iii. For the protected class group(s) HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region?**

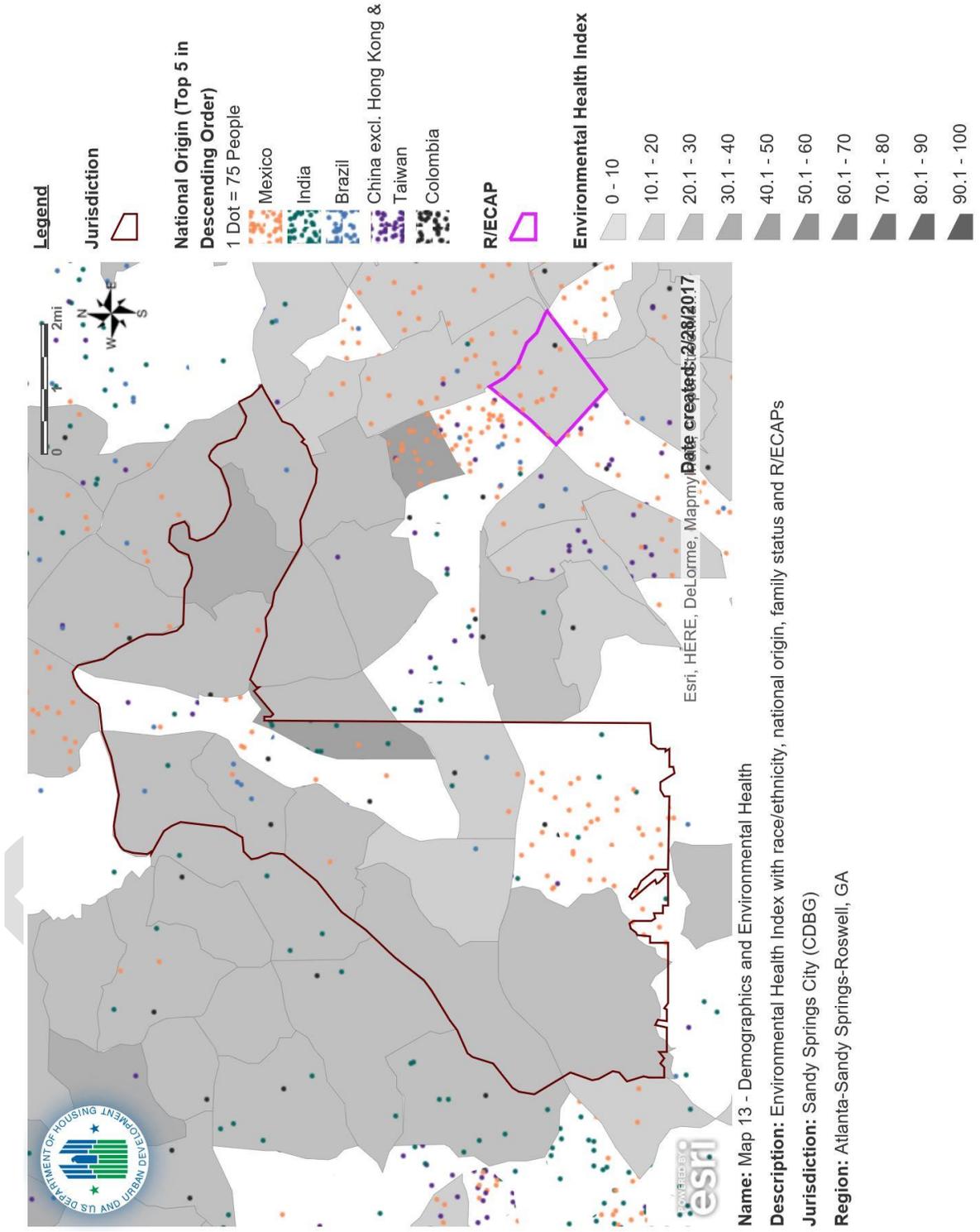
The data suggests very little disparity in across protected classes in measures of exposure to poor environmental conditions.

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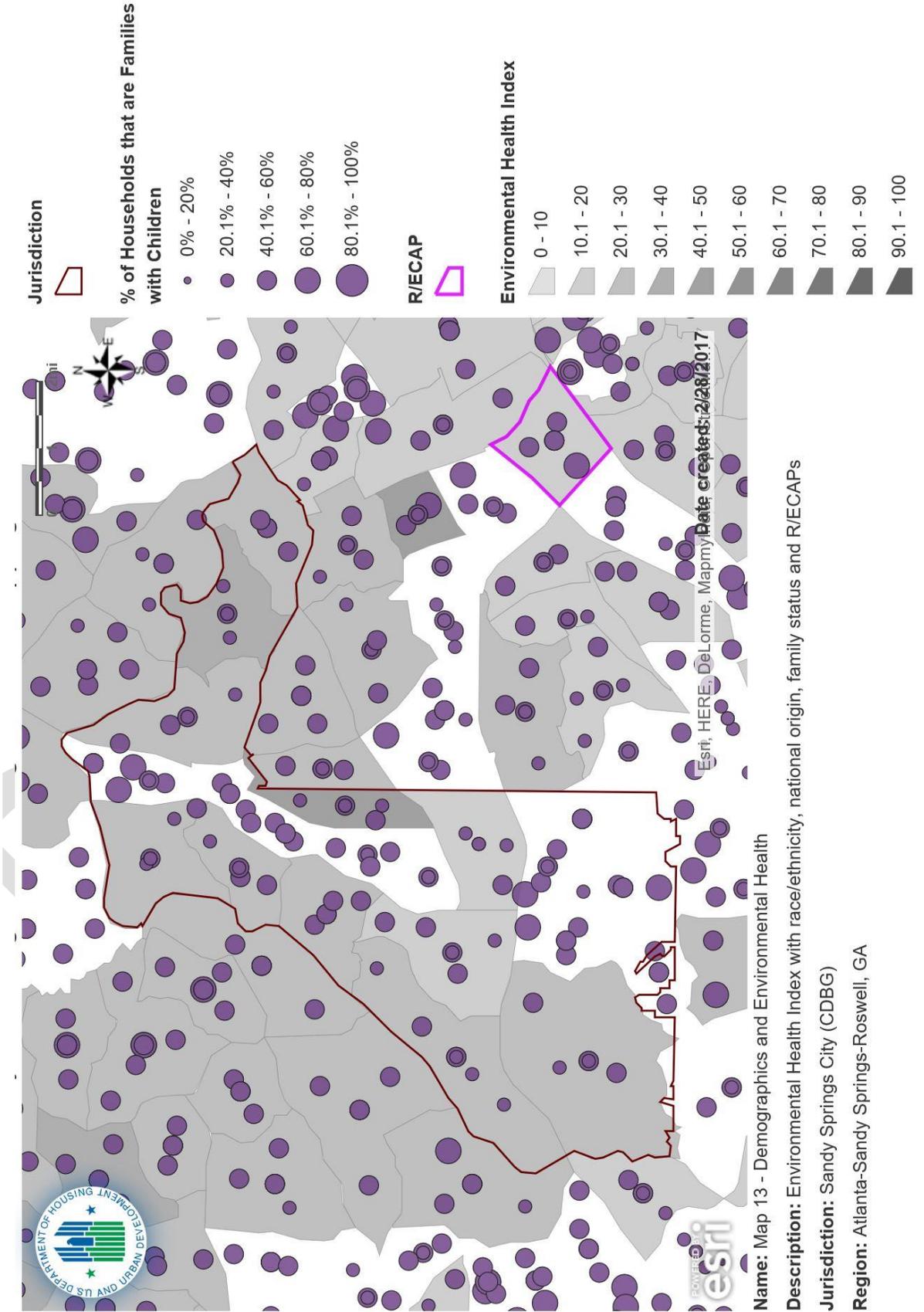
**Figure 28 –Low Environmental Health Index and Race/Ethnicity in the City of Sandy Springs**



**Figure 29 –Low Environmental Health Index and National Origin in the City of Sandy Springs**



**Figure 30 –Low Environmental Health Index and Households with Children in the City of Sandy**



**Name:** Map 13 - Demographics and Environmental Health

**Description:** Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

## f. Patterns in Disparities in Access to Opportunity

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**Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on Race/Ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.**

Based on existing data, Whites represent the majority of all home owners (80%), and Whites also comprise more of the rental units than any other race/ethnic group (42%).

Whites, Native Americans, and Asians tend to live in neighborhoods with greater access and proximity to proficient schools (Index values hover around 80) and to employment. These groups also have slightly higher labor-force participation and reside in neighborhoods with low poverty exposure and slightly better air quality, except for those Whites living below poverty. They appear to not often use public transit and reside in neighborhoods that have less access to public transportation.

Blacks and Hispanics and foreign populations tend to reside in neighborhoods with greater proximity to public transportation, and therefore are the groups that often use and rely on public transit. Blacks and Hispanics live in neighborhoods with less access to proficient schools (some Census tracts with an Index value as low as 30) and slightly less access to employment. As a result, they appear to have slightly less labor-force participation and reside in neighborhoods with more exposure to poverty than the other groups.

Families with children are distributed fairly evenly throughout the area.

### **2. Additional Information**

**a. Beyond the HUD-provided data, provide additional information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

Issues raised by community and stakeholder engagement regarding disparity in access to opportunities were: access to home ownership; transportation, and; the quality of lower cost rental. There is a clear gap in opportunity between owner-occupied and rental-dominant neighborhoods. Home values in the City of Sandy Springs are double that of the region, however, therefore, homeownership requires financial means much higher than average. The City's Comprehensive Plan identified the need to address the "missing middle" and provide a greater mix of housing types.

A few Census Tracts demonstrate characteristics of both high poverty coincident with concentrations of minority populations. The Housing stock in Sandy Springs is primarily

multifamily and aging. While the age of some of the developments in the City makes them inherently affordable, it also makes these units subject to greater need for maintenance. Since City incorporation, the Community Development Department's Code Enforcement Division has executed a program focused on enforcing property maintenance standards for over 70 apartment complexes.

Based on complaints received by residents on property maintenance, from June 2016 to June 2017 there have been at least 80 complaints concerning conditions, mostly of apartment units, related to water leaks, mold, flood, rodents, dysfunctional A/C units, holes on walls and roof. Since poor quality maintenance can have a significant impact in a person's quality life, the Community Development Department's Code Enforcement Division performs apartment sweeps every year by conducting inspections in multi-family developments to help protect the health and safety of residents. The Code Enforcement Division performs on average 12 apartment sweeps per year and 12 re-inspections by rotating around 70 properties over the course of 5 years. Additionally, multi-family properties are required to be inspected annually by certified third-party inspectors over the course of five years by going into the units to check for code compliance. This inspection is a requirement for property managers to renew their business license each year.

The historic Zoning Ordinance inherited from Fulton County set limitations on the maximum number of 3-bedroom units a developer could construct by limiting only 5% of the total number of units; this barrier has been addressed by the new draft Development Code, targeted for August 2017 adoption.

**b. The program participant may also describe other information relevant to its assessments of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

The City of Sandy Springs has committed its CDBG funds under the 2008-2012 and the 2013-2017 Consolidated Plan for the construction and improvement of sidewalks located in the eligible Low- and Moderate-Income (LMI) areas of the City throughout the Roswell Road Multiyear Sidewalk project. This project provides new sidewalks, streetlights, ADA ramps, brick pavers, and landscaping has improved safety for LMI residents accessing transit and other services in the corridor.

The City is currently developing a new development and zoning regulations, which seek to provide new opportunities in terms of connectivity and housing affordability within the City by providing set-aside mandates and incentives like height bonuses in exchange for public benefits. These public benefits can be affordable housing, outdoor amenity space available for the public, preservation of trees, and connections to MARTA. For example, the new Zoning Code will require new for-rent or for-sale developments of 20 units or more to set 10% on-site or 15% off-site of the total multi-units gross floor area of affordable housing. This targets households below 50%, 80%, and 120% of the Area Median Income. Additionally, the ordinance provides the option to pay a fee in-lieu to the City's affordable housing fund. In terms of mobility enhancement, the zoning rules require improved access to MARTA facilities and GA-400, and better bicycle or pedestrian connections.

### 3. Contributing Factors of Disparities in Access to Opportunity

**Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.**

Of the list of factors contributing to disparities provided by HUD, the following appear most applicable to the Sandy Springs context:

- Lack of private investments in specific neighborhoods
- Land use and zoning laws (in the past)
- Location and type of affordable housing
- The availability, type, frequency, and reliability of public transportation

#### iv. Disproportionate Housing Needs

##### 1. Analysis

**a. Which protected class groups (by Race/Ethnicity and familial status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing burdens when compared to other groups?**

The analysis prepared using the AFFH Tool identifies instances where housing problems exist. The Tool presents housing problems overall, as well as variations by Race/Ethnicity, household type and household size. To evaluate disproportionate housing needs, HUD provides information on housing problems drawn from the Comprehensive Housing Affordability Strategy (CHAS). This is a special tabulation of data from the U.S. Census Bureau's American Community Survey. The CHAS demonstrates the extent of housing problems and housing needs, particularly for low-income households (Tables 10 and 11).

Tables 10 and 11 show the percentage of Race/Ethnic groups and families with children experiencing two potential categories of housing need. The top portion of Table 10 shows households experiencing one of four housing problems:

- housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities),
- overcrowding (more than one person per room, excluding kitchen and bathroom),
- lacking a complete kitchen (lacking cooking facilities, a refrigerator, or a sink with piped water), or lacking plumbing.

The bottom section of Table 10 shows households experiencing one or more of four **severe housing problems** which are: severe housing cost burden (defined as paying more than half of one's income for monthly housing cost including utilities), overcrowding, and lacking a complete kitchen or

lacking plumbing. Table 11 shows the number of persons by Race/Ethnicity and family size experiencing severe housing cost burden (spending 50% of income or more on housing costs).

In the City of Sandy Springs, the total percent of households with a housing problem is slightly lower (34%) than the region (35%). Considering the poverty rate in Sandy Springs and the rest of the region, this data indicates that even those above the poverty level encounter housing challenges. The most common issue in the City is housing cost burden, since 99.8% of occupied housing units have complete plumbing facilities and 99.1% have complete kitchen facilities (Physical Housing Characteristics for Occupied Housing Units, 2011-2015 ACS).

The percentages of households with housing problems across all Race/Ethnicity and household type/size are slightly lower compared to the region as a whole, except for the Native Americans.

When comparing the percentages of households experiencing any of the four aforementioned housing problems in the City (Table 10), Hispanics (56%) and Blacks (48%) experience significant housing problems, compared to Whites (27%) and Asian/Pacific Islanders (21%). At the regional level, Hispanics (56%) and Blacks (48%) continue to be the groups who experience the most housing problems. Following these groups are Asian/Pacific Islanders (40%) and Native Americans (42%). White residents (29%) are the smallest percentage of the total population who face housing problems.

**Severe housing cost burden** is defined as paying more than half of one's income for monthly housing cost including utilities. Table 10 shows that Native Americans and Other racial/ethnic groups experience the highest severe housing cost burden, with households' percentages of 38% and 41%, respectively. However, it is important to note that these groups represent a very small percentage of the entire population (2% and 0.7%). Blacks and Hispanics (both groups at 21%) have the highest percentage of severe housing cost burden compared to Whites (13%), and Asians (6%). At the regional level, Black and Hispanic residents continue to have the highest percentage of housing cost problems at similar rates (23%) and (25%) respectively, compared to Whites (12%), Asian/Pacific Islanders (17%), and Native Americans (15%). The regional comparison however shows that that Sandy Springs rates of White population with housing problems (29%) **are much higher** than the region (12%). Again, this result seems to underscore the high costs of housing – an economic discrepancy.

**Table 10 – Demographics of Households with Disproportionate Housing Needs in the City and Region.**

<b>Disproportionate Housing Needs</b>	<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>			<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>		
<b>Households experiencing any of 4 housing problems</b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>
<b>Race/Ethnicity</b>						
White, Non-Hispanic	7,120	26,190	27.19%	295,526	1,060,274	27.87%
Black, Non-Hispanic	4,325	8,965	48.24%	290,077	610,123	47.54%
Hispanic	2,155	3,825	56.34%	76,061	135,669	56.06%
Asian or Pacific Islander, Non-Hispanic	440	2,105	20.90%	31,618	81,647	38.73%
Native American, Non-Hispanic	15	40	37.50%	1,863	4,442	41.94%
Other, Non-Hispanic	320	605	52.89%	10,668	25,383	42.03%
<i>Total</i>	<i>14,370</i>	<i>41,725</i>	<i>34.44%</i>	<i>705,860</i>	<i>1,917,580</i>	<i>36.81%</i>
<b>Household Type and Size</b>						
Family households, <5 people	5,765	20,270	28.44%	348,585	1,105,657	31.53%
Family households, 5+ people	1,155	2,350	49.15%	93,825	200,309	46.84%
Non-family households	7,450	19,110	38.98%	263,395	611,579	43.07%
<b>Households experiencing any of 4 Severe Housing Problems</b>						
	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>						
White, Non-Hispanic	3,680	26,190	14.05%	137,309	1,060,274	12.95%
Black, Non-Hispanic	2,175	8,965	24.26%	155,374	610,123	25.47%
Hispanic	1,405	3,825	36.73%	47,671	135,669	35.14%
Asian or Pacific Islander, Non-Hispanic	220	2,105	10.45%	17,382	81,647	21.29%
Native American, Non-Hispanic	15	40	37.50%	724	4,442	16.30%
Other, Non-Hispanic	260	605	42.98%	5,767	25,383	22.72%
<i>Total</i>	<i>7,745</i>	<i>41,725</i>	<i>18.56%</i>	<i>364,295</i>	<i>1,917,580</i>	<i>19.00%</i>
<p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: Data Sources: CHAS</p> <p>Note 4: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info">www.hudexchange.info</a>).</p>						

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012.

**Table 11 – Demographics of Households with Severe Housing Cost Burden in the City and Region (2008-2012).**

Households with Severe Housing Cost Burden	(Sandy Springs City, GA CDBG) Jurisdiction			(Atlanta-Sandy Springs-Roswell, GA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
<b>Race/Ethnicity</b>						
White, Non-Hispanic	3,390	26,190	12.94%	125,145	1,060,274	11.80%
Black, Non-Hispanic	1,855	8,965	20.69%	139,938	610,123	22.94%
Hispanic	795	3,825	20.78%	33,513	135,669	24.70%
Asian or Pacific Islander, Non-Hispanic	130	2,105	6.18%	14,136	81,647	17.31%
Native American, Non-Hispanic	15	40	37.50%	644	4,442	14.50%
Other, Non-Hispanic	250	605	41.32%	5,162	25,383	20.34%
<i>Total</i>	<i>6,435</i>	<i>41,725</i>	<i>15.42%</i>	<i>318,538</i>	<i>1,917,580</i>	<i>16.61%</i>
<b>Household Type and Size</b>						
Family households, <5 people	2,395	20,270	11.82%	154,875	1,105,657	14.01%
Family households, 5+ people	149	2,350	6.34%	30,682	200,309	15.32%
Non-family households	3,890	19,110	20.36%	133,040	611,579	21.75%
Note 1: Severe housing cost burden is defined as greater than 50% of income. Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total problems. Note 4: Data Sources: CHAS Note 5: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).						

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012.

**b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant Race/Ethnicity or national origin groups in such areas?**

According to data provided by HUD (Figures 31 and 32), the areas with greatest housing burden are located on Census Tracts 010119 (area surrounding the Northridge Shopping Center), 010118 (area surrounding the Dunwoody Elementary School), 010117 (Morgan’s Landing area), 010123 (area surrounding the Weber School), 010212 (area surrounding the Fountain Oaks Shopping Center), and 010113 (area surrounding the Perimeter Circle apartment homes).

Census Tracts 010119, 010118, 010117, 010123 are located in integrated areas with the predominant Race/Ethnicity in these areas being approximately 40% Black. These areas also have higher rates of foreign-born populations - predominantly from El Salvador and Mexico. In these Census Tracts, approximately 40% to 56% of households report having any of the four housing problems. Census Tracts 010112 and 010113 are located in segregated areas that are predominantly Hispanic, with foreign-born populations from Mexico. Approximately 35% of households in these two Census Tracts face one or more of d housing problems.

**c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.**

There are two public housing facilities in the City, which are managed by the Housing Authority of Fulton County: Sterling Place, a hundred-unit elderly building; and Belle Isle Apartments, a nine-unit family public housing complex. Through the Section 8 program, there are approximately

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306 households in 0-1 bedroom units, 9 households in 2 bedroom units and 0 households in 3+ bedroom units, and 0 households with children. Most of these units are reserved to senior residents. Through the Housing Choice Voucher program there are 110 households in 0-1 bedroom units, 21 households in 2 bedroom units, 10 households in 3 or more bedroom units, and 16 households with children.

**Table 12 – Publicly Supported Housing Program Category: Units by Number of Bedroom and Number of Children in the City of Sandy Springs in 2013.**

Housing Type	(Sandy Springs City, GA CDBG) Jurisdiction								
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children		
	#	%	#	%	#	%	#	%	
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	306	96.84%	9	2.85%	0	0.00%	0	0.00%	
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	
HCV Program	110	75.86%	21	14.48%	10	6.90%	16	11.03%	

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACTS), 2013.

**d. Describe the differences in rates of renter and owner occupied housing by Race/Ethnicity in the jurisdiction and region.**

In the City of Sandy Springs, 86% of all homeowners are White (Table 6). Blacks comprise 6% of all homeowners, followed by Asian and Native Americans at around 3% each.

White populations also comprise the largest group of all renters (42%), followed by Blacks (35%), Hispanics (15%) and Asian and Other groups constituting just 3% of all renters.

**2. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**

No other information is available at this moment.

**b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA’s overriding housing needs analysis.**

No other information is available at this moment.

**3. Contributing Factors of Disproportionate Housing Needs**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

Of the factors HUD prepares for consideration, the data and input from the community suggest the following three likely contribute to conditions of housing needs observed in the City:

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods

To understand which factors may contribute to generating cost burden conditions and other fair housing concerns, data related to average income and measurements of affordability were gathered and analyzed, as follows below.

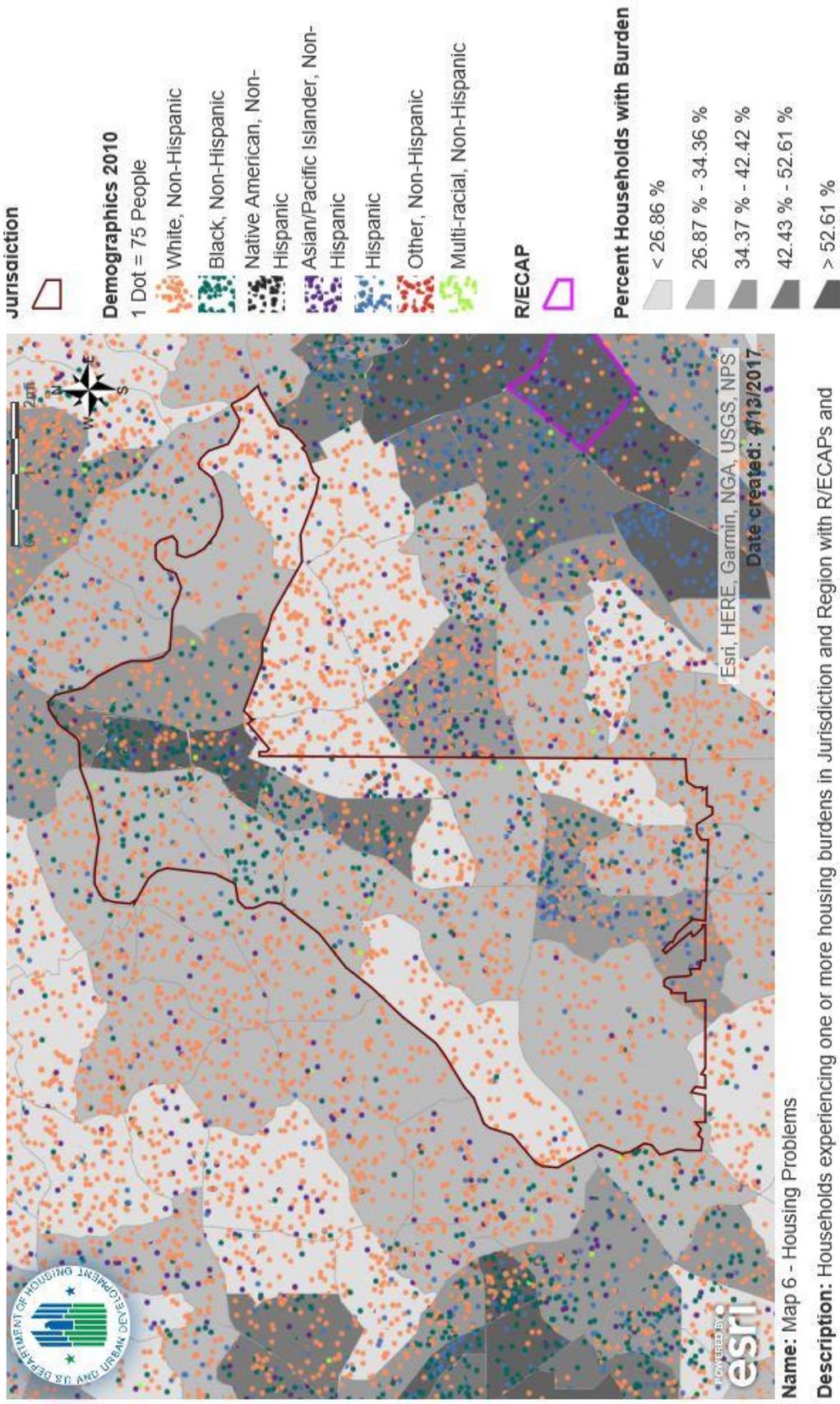
Using the HUD published Average Median Income (AMI) for the Atlanta-Sandy Springs HUD FMR Area of \$69,700, the following table reports affordable levels of rent for households below that AMI. Note that this data does not account for needs associated with different household size, only total income and “affordable” as spending no more than 30% of income on housing.

**Affordable Rent Associated with Salaries below 2017 AMI (\$69,700)**

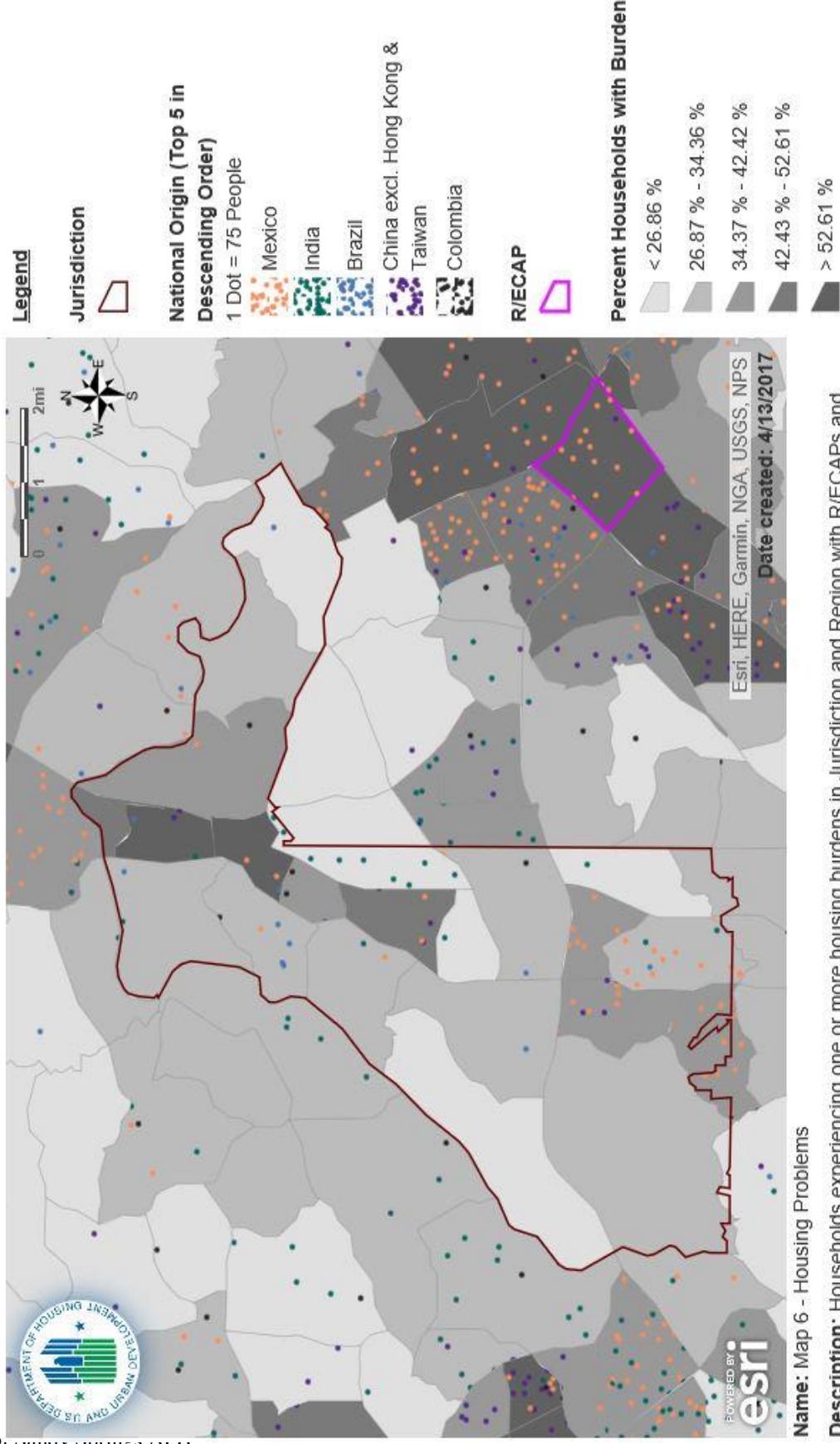
AMI %	Salary	Affordable Rent
100%	\$69,700	\$1,742
90%	\$62,730	\$1,568
80%	\$55,760	\$1,394
70%	\$48,790	\$1,219
60%	\$41,820	\$1,045
50%	\$34,850	\$871
40%	\$27,880	\$697
30%	\$20,910	\$522

The City maintains an inventory of multi-family rental complexes, including average unit lease; for 2016, this inventory shows that the **average 1-bedroom rented for \$1,064** per month. The average 2-bedroom leased at **\$1,321 per month**. Seven of 72 apartment complexes offered **1-bedroom leases under \$850** or less per month; of these, the lowest was \$652, four were in the \$700’s and three in the \$800’s. Only one complex offered a 2-bedroom lease under \$850 per month.

**Figure 31—Housing Burden and Race/ Ethnicity in the City of Sandy Springs**



**Figure 32 –Housing Burden and Race/ Ethnicity in the City of Sandy Springs**



**Name:** Map 6 - Housing Problems

**Description:** Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

## 1. Analysis

### a. Publicly Supported Housing Demographics

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**i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction? Compare the racial/ethnic demographics of each category of publicly supported housing for the jurisdiction to the demographics of the same category in the region.**

The Housing Authority of Fulton County (HAFC) has two public housing properties in Sandy Springs. Each property was constructed by the HAFC prior to the City's incorporation on December 1, 2005. Table 13A shows a total of 9 public housing units in the City. These units are part of the Belle Isle Apartment Complex. Additionally, there is the Sterling Place apartment complex, which is also under the HAFC. Sterling Place has a total of approximately 100 units available to seniors and the disabled who meet the income and eligibility guidelines for public housing. In regards to Project-based Section 8 programs, there is a total of 322 units in the City. These consists of two properties; the Campbell Stone North Apartments with 197 units and the Hellenic Tower with 125 units.

According to Table 13 B, in the City of Sandy Springs there are approximately 9% of individuals with disabilities Section 8 programs, and 30% in HCV programs. According to Table 14 A, demographic data of public housing facilities in the City is currently not available. For Section 8 developments, White households predominately occupy both the Campbell Stone Apartments and the Hellenic Tower.

According to Table 14 B project-based Section 8 units within the City are overwhelmingly occupied by White households constituting to 82% compared to Blacks (5%), Hispanics (3%), and Asian or Pacific Islanders (10%). HCV Program units are similarly occupied by a combined majority of White (41%) and Black (48%) households. Hispanics and Asians or Pacific Islander constitute to 8.57% and 2.14%, respectively.

In the region, public housing is overwhelmingly occupied by Black households (86%), Whites account for 9%, Hispanics and Asian/Pacific Islanders make up only 2% and 2%, respectively. Project-based Section 8 units continue to be primarily occupied by Black households (74%), White households make up 22%, Hispanics 2%, and Asian/Pacific Islanders 2%. Within HCV Program units for the most part are occupied by Black households (94%), Whites (4%), Hispanics (1%), Asian/Pacific Islanders 0.7%. According to Table 13. B., about 31% of individuals with a disability live in public housing, 9% in Section 8 programs, 18% in HCV programs, and 5% other multi-family programs.

**Table 13 A – Publicly Supported Housing Units by Program Category in the City of Sandy Springs in 2013.**

<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>		
<b>Housing Units</b>	<b>#</b>	<b>%</b>
Total housing units	45,496	-
Public Housing	9	0.02%
Project-based Section 8	322	0.71%
Other Multifamily	N/a	N/a
HCV Program	66	0.15%

Note 1: Data Sources: Decennial Census; APSH  
 Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACTS), 2013.

**Table 13 B - Disability by Publicly Supported Housing by Program Category in 2013.**

<b>(Sandy Springs City, GA CDBG) Jurisdiction</b>	<b>People with a Disability</b>	
	<b>#</b>	<b>%</b>
Public Housing	N/a	N/a
Project-Based Section 8	27	8.54%
Other Multifamily	N/a	N/a
HCV Program	44	30.34%
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>		
Public Housing	1,721	31.27%
Project-Based Section 8	951	9.18%
Other Multifamily	83	4.85%
HCV Program	6,469	17.63%

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.  
 Note 2: Data Sources: ACS  
 Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACTS), 2013.

**Table 14 A - Demographics of Publicly Supported Housing Development by Program in 2013.**

Public Housing (Sandy Springs City, GA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Allen Road Midrise	GA264	Housing Authority Of Fulton County	9	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8 (Sandy Springs City, GA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Campbell Stone North Apartment	N/a	N/a	197	87%	8%	3%	2%	N/a
The Hellenic Tower	N/a	N/a	125	72%	2%	3%	24%	N/a
Note 1: For LIHTC properties, this information will be supplied by local knowledge.								
Note 2: Percentages may not add to 100 due to rounding error.								
Note 3: Data Sources: APSH								
Note 4: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).								

Source: National Low-Income Housing Tax Credit (LIHTC), Database, 2013.

**Table 14 B– Publicly Supported Households by Race/ Ethnicity in the City and Region in 2013.**

(Sandy Springs City, GA CDBG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	255	81.73%	17	5.45%	8	2.56%	32	10.26%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	57	40.71%	68	48.57%	12	8.57%	3	2.14%
Total Households	26,190	62.77%	8,965	21.49%	3,825	9.17%	2,105	5.04%
0-30% of AMI	1,965	42.67%	1,635	35.50%	565	12.27%	265	5.75%
0-50% of AMI	2,905	35.25%	2,670	32.40%	1,565	18.99%	315	3.82%
0-80% of AMI	5,650	39.52%	4,895	34.24%	2,440	17.07%	450	3.15%
(Atlanta-Sandy Springs-Roswell, GA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	520	9.64%	4,634	85.91%	88	1.63%	149	2.76%
Project-Based Section 8	2,193	22.03%	7,399	74.34%	182	1.83%	168	1.69%
Other Multifamily	424	28.86%	879	59.84%	18	1.23%	148	10.07%
HCV Program	1,394	3.85%	34,075	94.21%	429	1.19%	246	0.68%
Total Households	1,060,274	55.29%	610,123	31.82%	135,669	7.08%	81,647	4.26%
0-30% of AMI	84,438	35.92%	111,346	47.37%	25,839	10.99%	9,222	3.92%
0-50% of AMI	135,378	30.78%	192,122	43.68%	53,459	12.15%	17,910	4.07%
0-80% of AMI	274,738	36.96%	310,128	41.72%	83,585	11.24%	28,926	3.89%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACTS), 2013.

**ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.**

According to ACS demographic estimates, Sandy Springs’ total Non-Hispanic White population was 59%, Non-Hispanic Black population was 20%, Hispanic made up 14%, Asian was 5%, Native American was 0.17%. Comparing these population shares, White residents are overrepresented in the Project-Based Section 8 program making up 82% compared to the overall population of 59%.

In regards to the Housing Choice Voucher program, slightly more Black households receive vouchers majority (48%) than White households (41%), but constitute just 20% of the total

population. Hispanics and Asians/Pacific Islander account for a small percentage within the HCV program, 9% and 2% respectively, compared to the City's total Hispanic population of 14% and Asians population of 5%.

HCV program appear in census tract 010205, and appears to have 22% of housing vouchers and census tracts 010110 contains 0.8% of housing vouchers.

In terms of public housing, the HUD data only reports one property, the Belle Isle Apartments, which serves nine families. There is another public housing property, which is the Sterling Place apartments, which serves exclusively senior citizens and disabled adults under 62. Data on the demographic composition of this property is not currently available.

In terms of persons that meet the income eligibility requirements, White populations constitute to the biggest percentage of individuals (43%) that earn between 0-30% of the AMI compared to Blacks (35%), Hispanics (12%), and Asian/Pacific Islander (6%).

## b. Publicly Supported Housing Location and Occupancy

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### **i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.**

Public Housing in the City consists of two properties: Sterling Place and Belle Isle Apartments. Sterling Place has approximately 100 units and exclusively serves senior citizens. This property is located in an area that is primarily White, and it is not located in a racially or ethnically concentrated area of poverty. This property is in proximity to Roswell Road, which has access to public transportation as well as other amenities and services. On the other hand, Belle Isle Apartments consists of nine units and is located in a more integrated area of the City; it is not located in a racially or ethnically concentrated area of poverty. This property is also located in proximity to Roswell Road with access to various services.

Section 8 properties in the City consist of Campbell Stone North Apartments which has 197 units and the Hellenic tower which has 125 units. Both properties serve exclusively senior citizens and both are located in proximity to Roswell Road with access to public transportation, amenities, and other services. The Campbell Stone North Apartments is located in an area which is primarily White, while the Hellenic tower is located in an area that is more integrated. Both properties are not located in a racially or ethnically concentrated area of poverty.

According to the HAFC, there are currently 34 Housing Choice Vouchers in the City. The vouchers currently serve 13 families, eight elderly residents, and 13 disabled. The HUD-provided map Figure 33, shows that those vouchers are located in census tract 0110 and 010205. These census tracts are located in integrated communities and are not located in any racially or ethnically concentrated areas of poverty.

**ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region?**

The discussion above in b(i) includes the extent of any discernible patterns.

**iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?**

The City of Sandy Springs does not have R/ECAP areas identified by the HUD mapping and data tools. While there are areas with high ethnic or racial minority concentrations within the City where individuals live below the federal poverty threshold, none of the publicly supported housing is located in those identified areas. Demographic composition of the publicly supported housing varies by the type of program. There is not current data that can identify the demographic composition of public housing facilities such as the Belle Isle Apartments and Sterling Place. However, these two facilities serve different population groups.

The Belle Isle Apartments serve families while the Sterling Place only serves seniors over the age of 64. The Section 8 housing units located in the City are primarily occupied by White households (82%), Blacks constitute to 5%, and Hispanics 3%, and Asian 10%. In HCV programs, which serve families with children and the disabled, Blacks constitute to 49%, Whites 41%, Hispanic 9%, and Asian 2%. For the Public Housing facilities, the demographic composition is not currently known.

**iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.**

As reported by the HAFC, the Georgia Department of Community Affairs (DCA) and the Rental Assistance Demonstration (“RAD”) from HUD awarded tax credit funds for the property at 144 Allen Road reaching a total of \$10 million. These funds were used to redevelop the seniors’ community now called Sterling Place with the construction being completed in 2016.

**(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.**

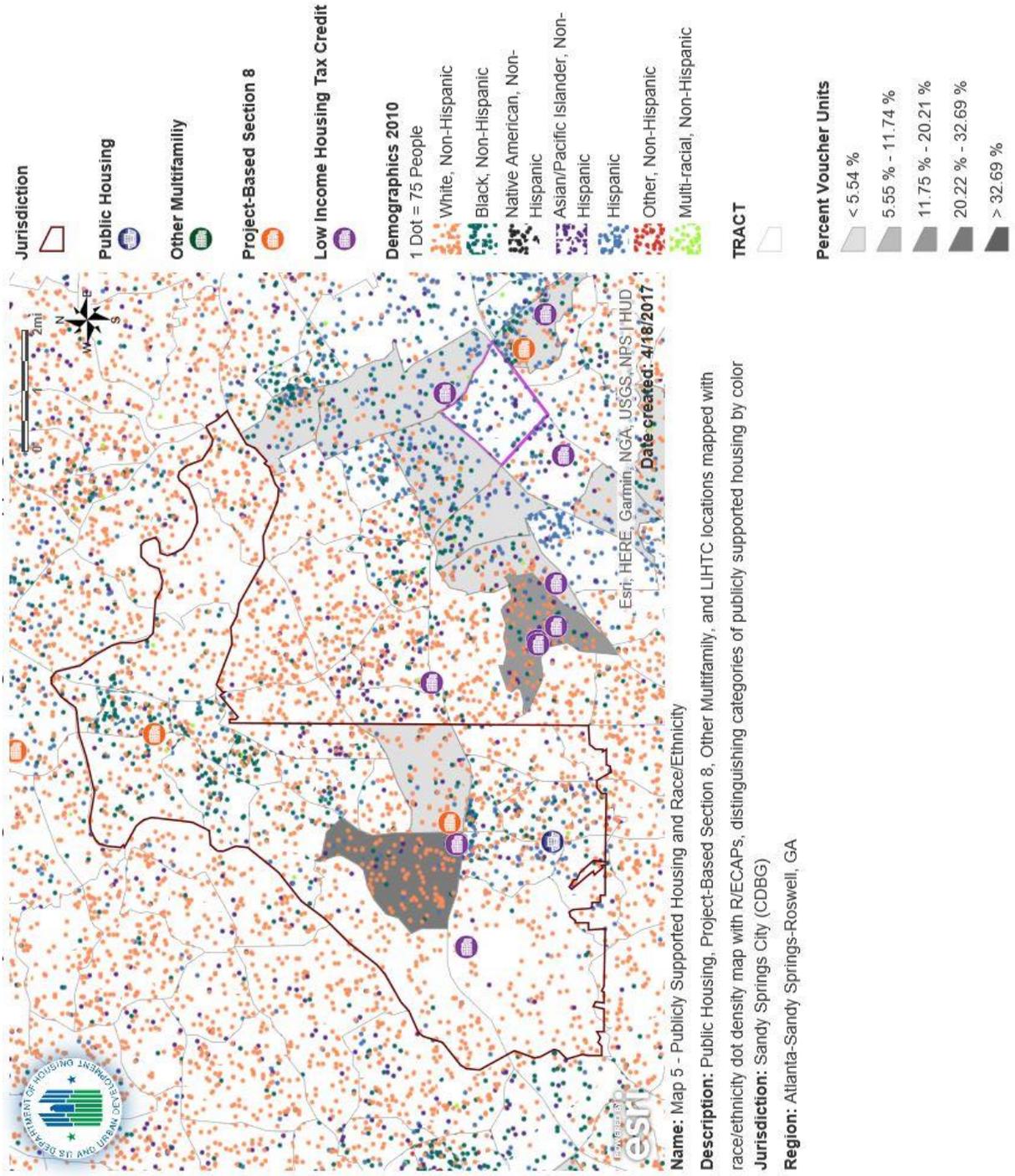
No additional data.

**v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one Race/Ethnicity are located in areas occupied largely by the same Race/Ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.**

Publicly supported housing in the City consists of two properties: Sterling Place, which serves seniors citizens and Belle Isle apartments, which serves families with children. There is no demographic data as for the demographic composition of Sterling Place, but based on the HUD-provided maps, it is located in a census tract (010205) that is primarily White (83%). The Belle Isle Apartment demographic composition is not currently available. However, it can be said, that the area of the location of the facility (census tract 010212) is primarily White constituting to 58%, Hispanics constitute to 22%, and Black is 14%.

Project-Based Section 8 programs in the City consists of Campbell Stone North Apartments and the Hellenic Tower and both facilities are primarily occupied by White individuals, 87% and 72%, respectively. The Campbell Stone North Apartments is located in an area that is primarily White constituting to 64%. The Hellenic Tower is also located in an area that is primarily White but a little more diverse, where the White population constitute to 55%, Black, 28%, Hispanic 10%.

**Figure 33 –Publicly Supported Housing and Race/ Ethnicity in the City of Sandy**



**Name:** Map 5 - Publicly Supported Housing and Race/Ethnicity

**Description:** Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with

race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

## c. Disparities in Access to Opportunity

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**i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

Both Public Housing and project-based Section 8 programs and serve senior citizens, these are located in proximity to Roswell Road, which has easy access to public transportation and to other amenities and services. These areas had been identified as having medium to high labor engagement and good proximity to jobs. However, these areas appear to have access to medium and low school proficiencies.

Housing Choice Voucher Programs are primarily located in census tract 010205 and 010110 have better access to proficient schools, job proximity, labor engagement, and access to transportation. There are currently 34 housing vouchers in the City. There are currently 34 housing vouchers issued in the City. The vouchers currently serve 13 families, 8 elderly residents, and 13 disabled. The HAFC indicated that housing vouchers in the City have been drastically decreasing due to increase in rents and related factors.

## 2. Additional Information

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**

The Housing Authority of Fulton County (HAFC) has two public housing properties in Sandy Springs. Each property was constructed by the HAFC prior to the City's incorporation on December 1, 2005. The HAFC also provides between 40-60 housing vouchers to eligible program participants for rent market apartments in Sandy Springs each year. The HAFC also provided bond financing to private housing developers to construct 594 units of mixed-income, multifamily housing in the early 1990s. Those properties are the Edgewater, formerly known as the Commons at Victoria Park, and the Addison, formerly known as Hampton Hill, the Adair, apartments, and Lyon Jasmine Apartments. Each development has a percentage of set-aside units for those who meet the income and eligibility requirements of public housing programs, along with market rate units. The HAFC has reported that the bond financing for each of the properties has ended, therefore the requirement to maintain a set aside of affordable units no longer applies. This can significantly affect the number of available affordable units in the City due to the property owners' ability to increase rent.

According to the Metro Atlanta Affordable Housing Tool provided by the Neighborhood Nexus shows that there are approximately three developments that received Federal Housing Administration (FHA) subsidies, which provide mortgage insurance on loans by FHA-approved

lenders. Such developments include Riverview Apartments (now called Avalon Townhomes), Hamptonwoods apartments (now called the Addison), the Celebration at Sandy Springs, and Dogwood Forest of Dunwoody, which provides assisted living. There is not currently available data for the demographic composition of each of the complexes. However, based on the HUD-Provided maps, it can be said that these properties are located in the most integrated areas of the City. These subsidies have expiration dates in 2040. Section 8 Program such as the Hellenic Tower expires in 2024. Campbell Stone North Apartments receives two types of incentives, Section 8, which expired in 2014 and Section 202 is set to expire in 2019.

**b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.**

The City of Sandy Springs does not provide publicly supported housing. The Housing Authority of Fulton County is an independent organization, and the City has little influence on its decisions.

### **3. Contributing Factors of Publicly Supported Housing Location and Occupancy**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.*

- Quality of affordable housing information programs

## D. Disability and Access Analysis

### 1. Population Profile

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**a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?**

Based on Table 15 and 16, Disability by Age Group and Disability by Type, it appears as if the region has as twice as much individuals with disabilities for age groups 5-17 and 18-64 as the City. Within the City of Sandy Springs, there is approximately 0.5% of people with disabilities between the ages 5-17, while the region has 0.9%. Additionally, 3% are individuals with disabilities between ages 18-64 in the City, whereas the region has 6%. However, both the City and the region have similar percent of individuals with disabilities of age 65 and over. Within the City, ambulatory disabilities are the most common type in Sandy Springs affecting 4% of the population, followed by cognitive difficulties which appear to impact about 3% of the population. In the region, ambulatory disabilities are also the most common type and affect about 6% of the population, as well as cognitive disabilities in second rank where 4% of the population are impacted.

According to Figure 35, there is a high concentration of individuals with hearing, vision, and cognitive disabilities dispersed along the Roswell Road corridor from the north to the south. It appears as if the Panhandle area and the Southwest portion of the City have less concentration of individuals with hearing, vision, and cognitive disabilities compared to the areas from the north to south along Roswell Road. Persons with disability appear to reside in those neighborhoods located along Roswell Road. These have been identified as the integrated areas of the City. In terms of R/ECAPs, the HUD-provided data does not identify any tracts in the City, however, census tracts 010119, 010118, 010212, have been identified as areas with a high percentage of households living below the federal poverty level. People with disabilities appear to reside in higher proportions in these areas than other areas.

**Table 15 – Disability by Age Group in the City and Region**

Age of People with Disabilities	(Sandy Springs City, GA CDBG) Jurisdiction		(Atlanta-Sandy Springs-Roswell, GA) Region	
	#	%	#	%
age 5-17 with Disabilities	415	0.46%	43,816	0.88%
age 18-64 with Disabilities	2,714	3.01%	285,608	5.77%
age 65+ with Disabilities	3,150	3.50%	177,645	3.59%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Source: American Community Survey 2009-2013.

**Table 16 – Disability by Type in the City and Region**

Disability Type	(Sandy Springs City, GA CDBG) Jurisdiction		(Atlanta-Sandy Springs-Roswell, GA) Region	
	#	%	#	%
Hearing difficulty	1,855	2.06%	124,237	2.51%
Vision difficulty	1,214	1.35%	96,741	1.95%
Cognitive difficulty	2,309	2.56%	195,085	3.94%
Ambulatory difficulty	3,319	3.69%	273,305	5.52%
Self-care difficulty	1,690	1.88%	101,952	2.06%
Independent living difficulty	2,743	3.05%	185,645	3.75%

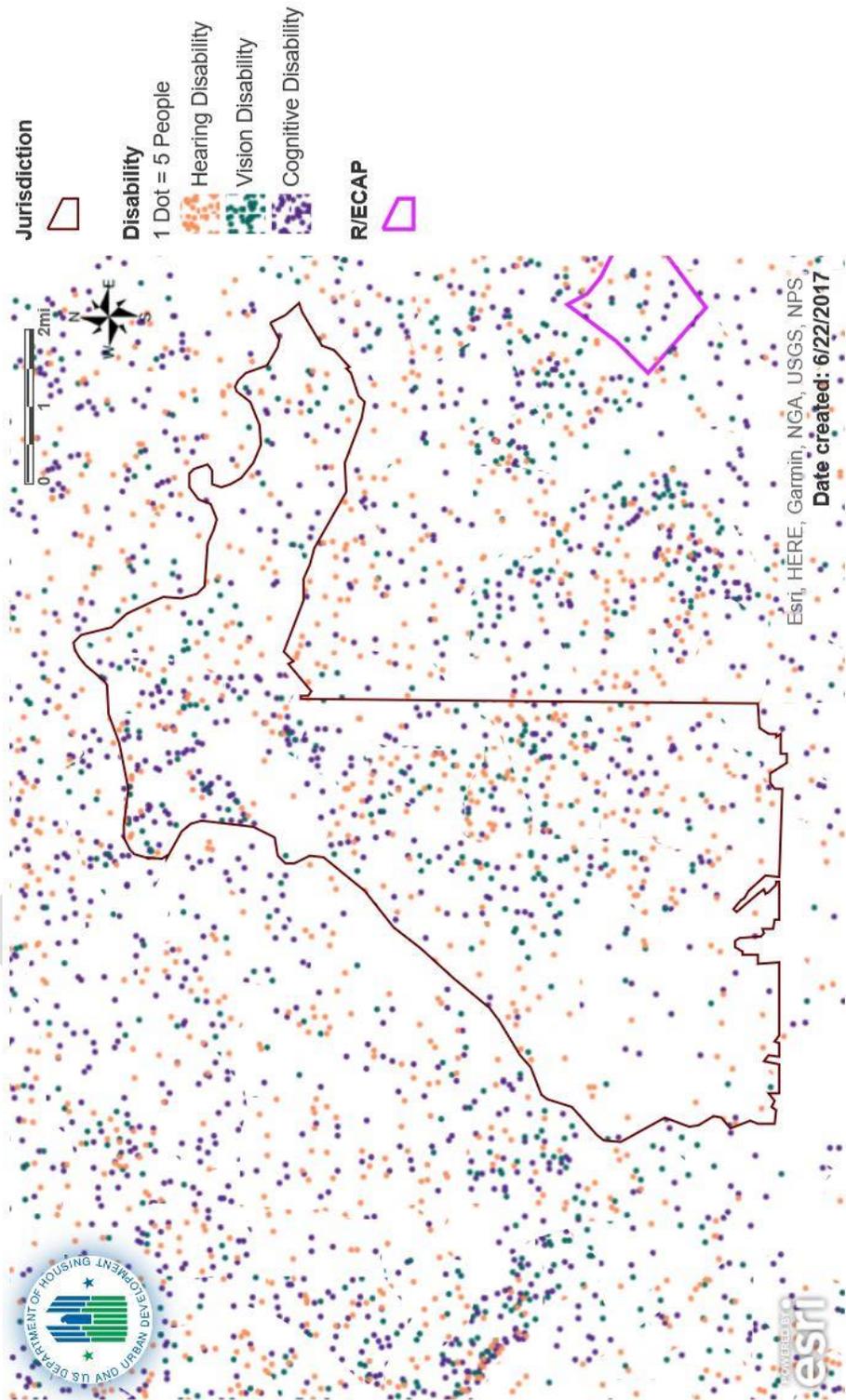
Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Source: American Community Survey 2009-2013.

**Figure 34. A – Hearing, Vision, Cognitive Disability in the City of Sandy Springs**



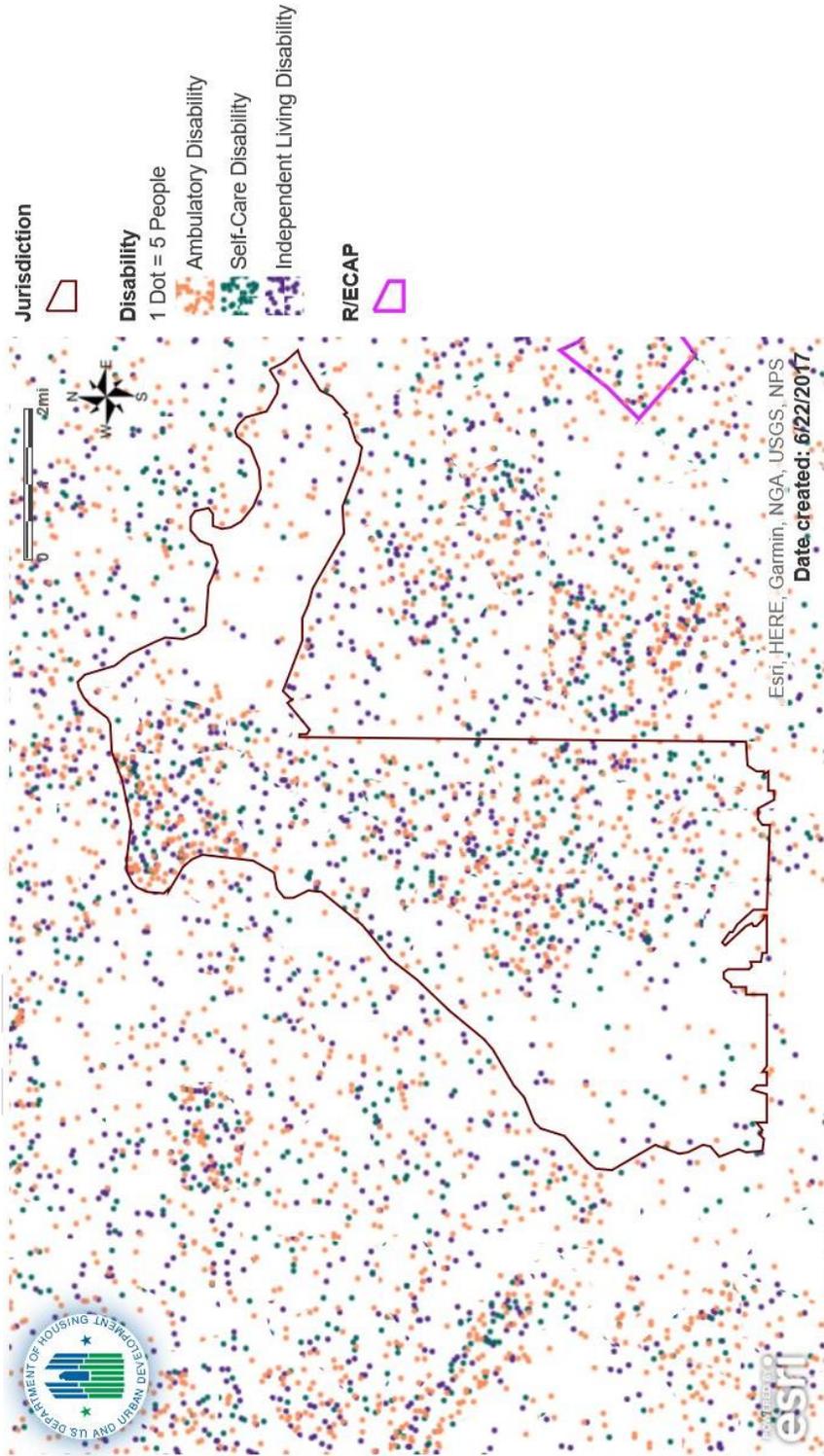
**Name:** Map 14 - Disability by Type

**Description:** Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

**Figure 34. B – Ambulatory, self-care and independent living difficulties in the City of Sandy Springs**



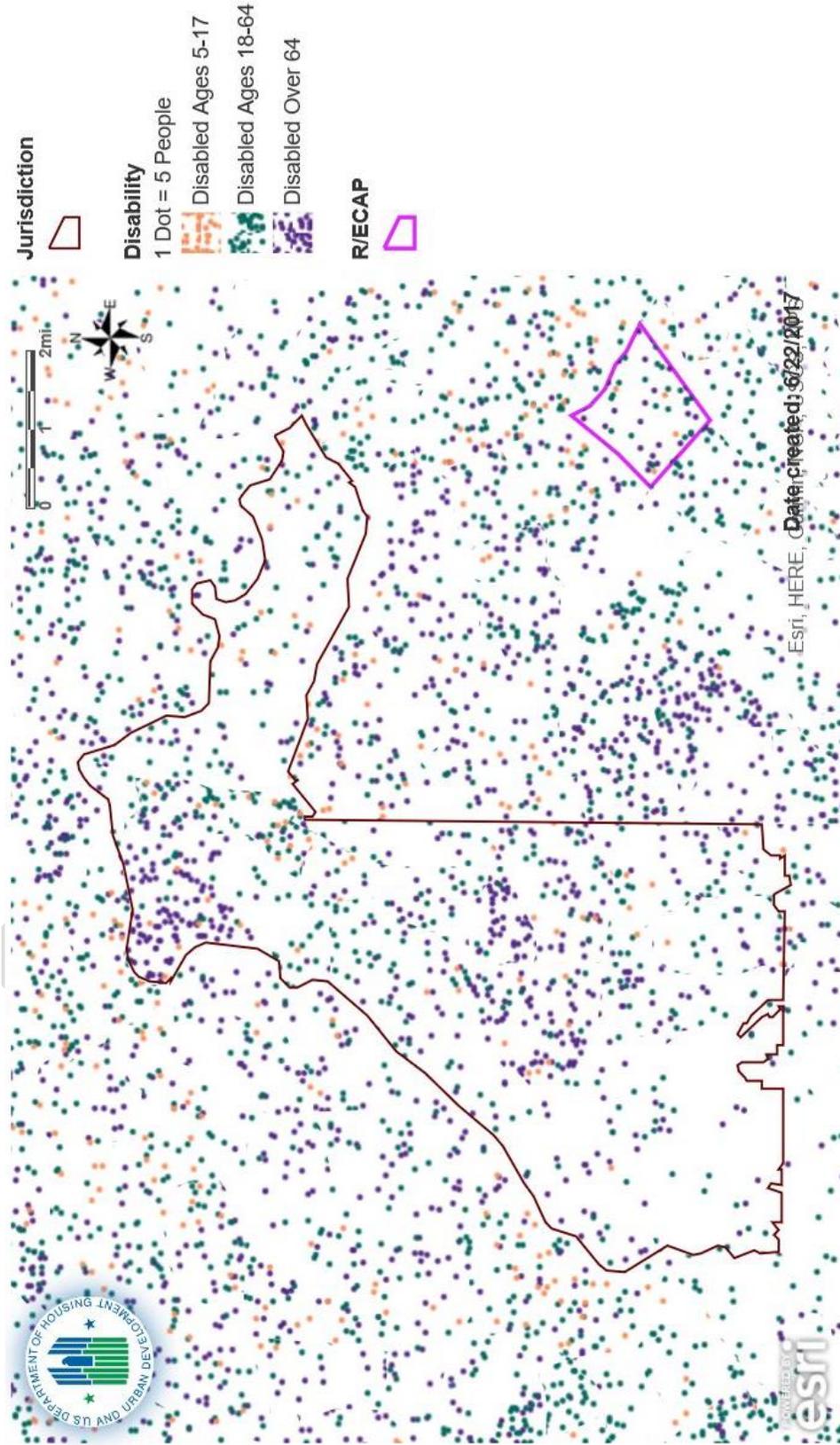
**Name:** Map 14 - Disability by Type

**Description:** Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

**Figure 35– All persons with disabilities by age group in the City of Sandy Springs**



**Name:** Map 15 - Disability by Age Group

**Description:** All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

**Jurisdiction:** Sandy Springs City (CDBG)

**Region:** Atlanta-Sandy Springs-Roswell, GA

**b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.**

There appear to be patterns in the geographic distribution of individuals with type of disability and by age group based on Figure 34 and 35. In general, individuals with any type of disability appear to reside in high concentrations in census tract 010208 (area surrounding the Cherokee Town and Country Club), 010119 (area surrounding the north river shopping center), 010118 (area surrounding the Dunwoody Springs Elementary School), 010123 (area surrounding the Weber School), 010205, (area surrounding the new City Springs), 010121 (area surrounding the Sandy Springs Shopping Center), 010110 ( area surrounding the Lowe’s Shopping Center).

Children with disabilities ages 5- 17 appear to reside more in census tracts 010208, 010118, and 010205. These census tracts also have higher concentrations of people with hearing, vision and cognitive disabilities. Individuals with disabilities ages 18-64 reside in higher proportions in census tracts 010119 and 010118. These two census tracts also indicate higher rates individuals with hearing and cognitive disabilities. Seniors citizens over the age of 64 appear in high percentages in census tracts 010208, 010205, 010121, and 010110. These census tracts also appear to have a higher concentrations of people with hearing, vision, and cognitive disability.

## **2. Housing Accessibility**

**a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.**

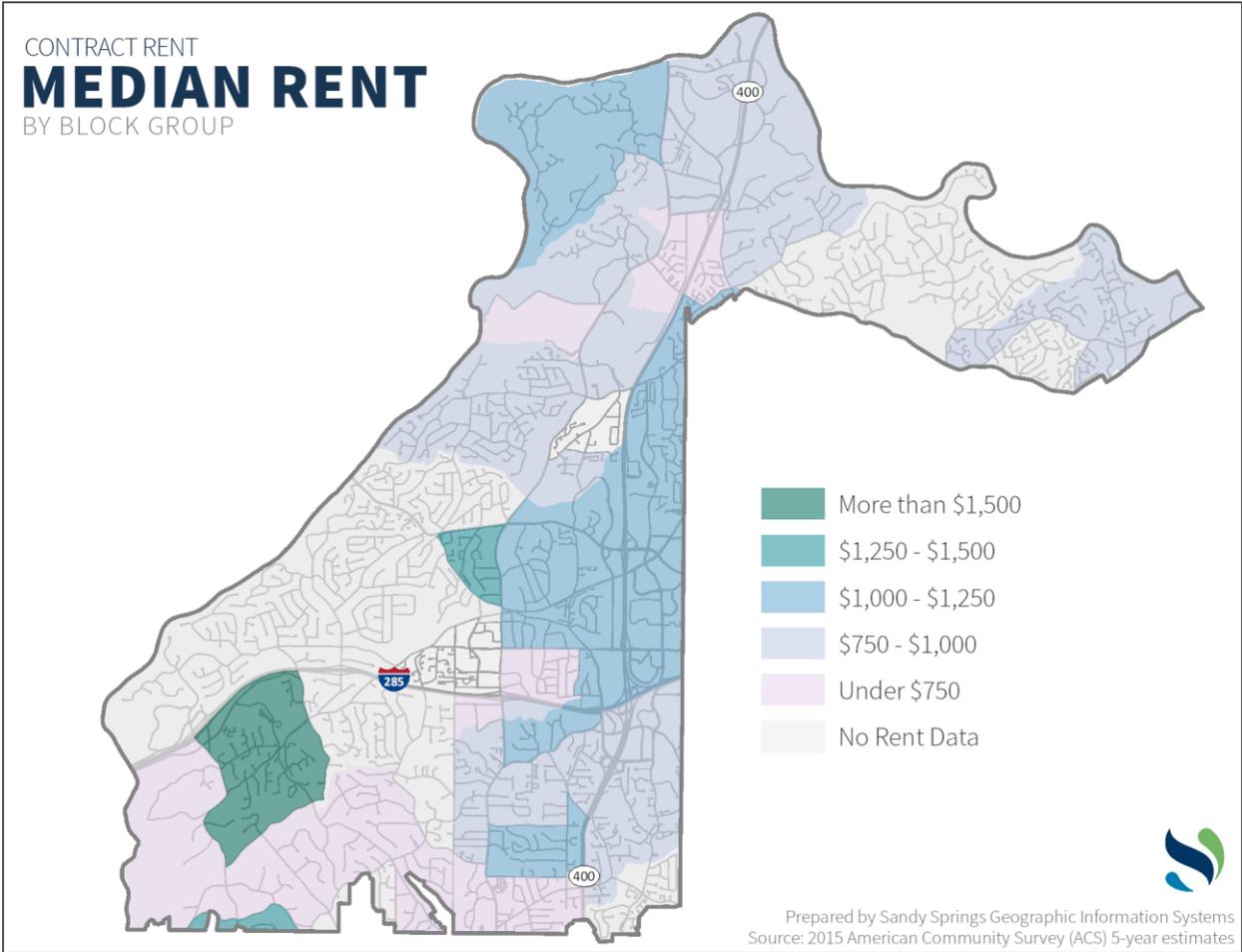
The City of Sandy Springs has approximately 42,000 housing units. Approximately 22,000 are renter-occupied units, in which the majority of rental price ranges from \$800 to \$1,500. There are approximately 7,600 rental units that cost less than \$700 units. For owner-occupied housing units, there are approximately 20,000 housing units. There is no data currently available that would help indicate the number and cost of units that are already accessible for people with disability.

**b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated for the jurisdiction and region?**

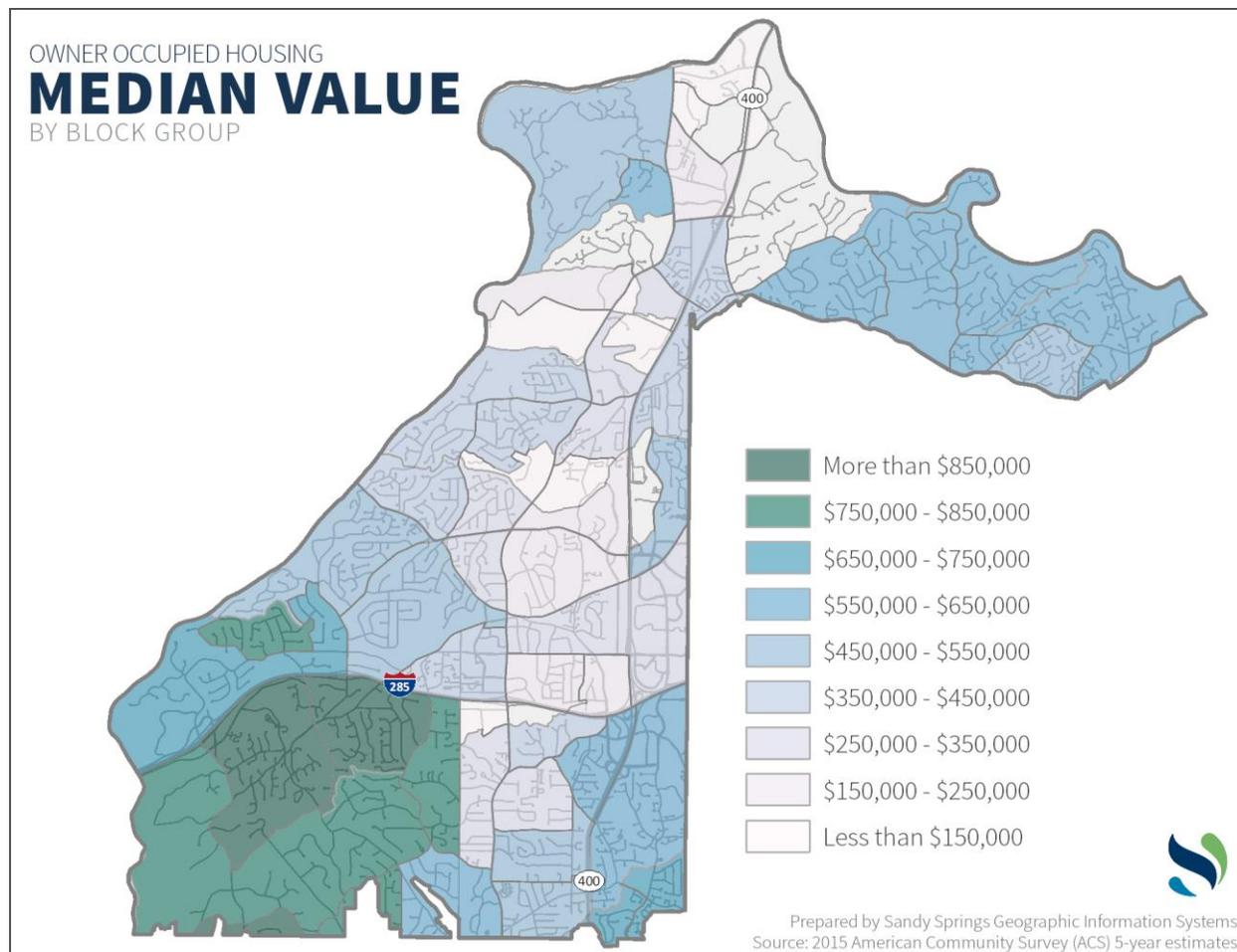
The City does not have data currently on the number of units already accessible. However, federal laws require public and private development to be ADA accessible. According to the map below multi-family rental units with rent of less than \$750 and between \$750 and \$1,000 are located along Roswell Road on the northern portion (census tracts 010120, 010119, 010118, 010117) of the City and along Roswell Road south of GA-285 (specifically 010212 or Prado). These census tracts have been identified as the most integrated areas of the City. Some of the location of these units also coincide with the areas with high population of households living below the federal poverty line, which have been identified as census tracts 010118 and 010212.

Rental units with lease rates between \$1,000 and \$1,250 as shown on the map below are located on the center portion of the City, between the eastern City limit, GA-400 and Roswell Road (census tracts 010122, 010123, 010121, and 010110). These areas have been identified as integrated areas

and do not align with the areas identified as having a high percent of households living below the federal poverty line.



For owner-occupied units, shown in the map below, the median value of a house in the Panhandle and Southwest area is approximately over \$650,000, and the prices decrease the in closer proximity to Roswell Road. The Panhandle, Southwest and Southeast corner have been identified as affluent areas with high concentrations of White populations. The City does not currently have data on the cost and the number of owner and rental units in the City that are already accessible for people with disabilities.



**c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing for the jurisdiction and region?**

As Table 13 B shows, persons with disability do not have easy access to different types of publicly supported housing. Project-based Section 8 has only 27 or 9% of people with disabilities. Of the families supported by the HCV program, 44 (30%) of them have members with disabilities. The Sterling Place facility currently serves 83 seniors, and 15 disabled adults under 62, it has two vacancies. The Belle Isle apartments currently serves 9 families with of them being disabled.

The Atlanta region, however, offers a wider variety of publicly supported housing for people with disabilities. There are about 1,721 or 31% of people with disabilities that reside in public housing, 951 or 9% live in project-based Section 8 housing, 6,469 or 18% use the HCV program, and 83 or 5% reside in other types of multifamily program.

**3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

**a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?**

Figures 34 A and B and Figure 35 show that people with disabilities appear to reside in more integrated areas along Roswell Road than in segregated areas in the Panhandle area and Southwest area of the City. This may be due to the location of affordable multi-unit developments and less expensive owner-occupied housing compared to the housing costs found on the Panhandle and Northwest portion of the City.

**b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.**

A variety of supported services are available at the regional and the City level. The following facilities have been identified in the Sandy Springs area as providing some form of housing assistance:

Community Assistance Center offers emergency assistance to families in needs, including financial, food, clothing and referrals. To aid in serving the community, CAC was the recipient of DCA ESG funds in 2007 to assist the homeless.

The Drake House provides 15 transitional housing units for up to 90 days to homeless single mothers with one or more children and provides life skill classes such as job readiness, personal finances, parenting skills, computer skills, and health and wellness.

Homestretch provides 27 transitional housing units for nine to twelve months to a homeless family or a family immediately with being homeless with children and also provides life skill classes.

Sandy Springs Mission provides after-school programs and food/clothing assistance.

At the regional level, there are a number of non-profit organizations such as the Senior Services North Fulton and All About Development Disabilities for adults and children with developmental and cognitive disabilities where they are able to obtain residential services, assisted living services, and educational programs. In terms of affordable housing through publicly supported housing under the HAFC, there are specific number units in each of the programs that are already accessible for individuals with disabilities. For example, the HCV programs currently serves 13 disabled residents and a total 16 in public housing. Non-publicly supported affordable housing in the City may be more of a challenge due to the high housing costs of rental and owner occupied units.

**4. Disparities in access to opportunity**

**a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:**

**i. Government services and facilities**

The City of Sandy Springs will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and

activities. For example, individuals with service animals are welcomed in the City of Sandy Springs offices, even where pets are generally prohibited.

Additionally, the City of Sandy Springs will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services, and activities, including qualified sign language interpreters, documents in Braille. The City would generally provide other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

The City of Sandy Springs will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Fulton County is also committed to ensuring that its physical facilities, programs, services, and activities are accessible to all member of the public, including qualified individuals with disabilities, in compliance with Title II of the Americans with Disabilities Act as amended and Section 504 of the Rehabilitation Act of 1973. Fulton County makes reasonable modifications to its policies, practices, and procedures to ensure non-discrimination.

**ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)**

The State of Georgia ADA Coordinator's Office Accessibility Code is the state accessible design regulations, which assigns minimum standards for accessibility in covered government building, public building, and facilities receiving permits for construction or renovation.

The City's Development Regulations and Zoning Code require sidewalks, multiuse trail, and parking to conform to the American with Disabilities Act (ADA) and the American Association of State Highway and Transportation Administration Official (ASSHTO) requirements.

**iii. Transportation**

MARTA provides equal employment, reasonable accommodations, accessible information, technology, facilities, and services to people with disabilities. Upon request, MARTA provides information about its services and products in accessible information to employees and customers with disabilities. Accessible formats include aids and services such qualified interpreters, information and documents in Braille, large-print, CD, audio recordings, and other specialized technology.

MARTA also provides accessible facilities and services making certain that its vehicles, building, and facilities (ramps, doorways, restrooms, counters, vending machines, telephones, parking etc.) are accessible to individuals with disabilities. For example, some of the accommodations MARTA provides include but are not limited to elevators, ramps, and enlarged doorways, raised lettering next to elevator buttons, restrooms with lowered sinks and enlarged stalls, and Telephone Devices for the Deaf (TDD). MARTA also provides supplementary mobility services for those individuals with disabilities who cannot use fixed route bus or rail services.

#### **iv. Proficient schools, educational programs, and jobs**

The Fulton County Department of Behavioral Health & Development Disabilities provides comprehensive services and training for adults residents with developmental disabilities by strengthening skills in the areas of social, emotional, physical, and intellectual developments. This organization serves approximately 300 people every year. Some of the training offered includes, pre-vocation training in how to enter the workforce, attendance, task completion, problem solving, safety, and workplace socialization. Some of the programs of this organization provides includes but are not limited to community integration, medication administration, parent training, supported employment referrals.

The North Fulton Government service center provides medical care including mental health services, employment assistance, foreclosure prevention, for residents with disabilities

Additional non-profits that offers services for children and adults with intellectual and developmental disabilities in Fulton County includes:

- Annandale Village provides services for adults with developmental and intellectual disabilities or traumatic brain injury. This organization provides residential services, assisted living, nursing, independent living, day programs, health and social services.
- All about Development Disabilities provides needed services, broad-based education, and advocacy for children, adults, and families living with intellectual and developmental disabilities.
- Marcus Autism Center is a not-for-profit organization and provides information, services, and programs to children with autism and related disorders including families and those who work around them. This organization provides clinical, behavioral, educational, and family support services.
- The ARC of Georgia is a not-for-profit membership organization that provides programs, funding, and public policy for people with intellectual and developmental disabilities that will contribute to the realization of learning, living, working and worshipping inclusively in their community.
- Tool for Life seeks to provide access to and acquisition of technology (AT) devices and services for Georgians of all ages and disabilities so they can live, learn, work and play independently in communities of their choice.
- Senior Services North Fulton provides services to the growing population of older adults who live in the northern part of Georgia by providing meals, transportation to and from medical appointments, and in-home services.

- Chastain Horse Park is non-profit organization that provides therapeutic riding programs serving individuals with physical, cognitive or emotional disabilities and provides outreach programs for inner City and at-risk youth.

**b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.**

For the HAFC Housing Choice Voucher program, HAFC must comply with a variety of regulations pertaining to physical accessibility, including the following:

- Notice PIH 2010-26
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

HAFC's policies concerning physical accessibility must be readily available to applicants and participants. They can be found in three key documents:

- This HAFC Administrative Plan describes the key policies that govern HAFC's responsibilities with regard to physical accessibility.
- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to nondiscrimination and accessibility in federally-funded housing programs
- The HAFC Administrative Plan provides information about self-evaluation, needs assessment, and transition plans.

When issuing a voucher to a family that includes an individual with disabilities, HAFC will include a current list of available accessible units known to HAFC and will assist the family in locating an available accessible unit, if necessary.

In general, owners must permit the family to make reasonable modifications to the unit. However, the owner is not required to pay for the modification and may require that the unit be restored to its original state at the family's expense when the family moves.

HAFC provides reasonable accommodation to the needs of individuals with disabilities. HAFC has one property located at 144 Allen Road, Sandy Springs, Georgia, designated for persons defined as either "Elderly" or "Disabled". HAFC also has units in South Fulton County for persons defined as either "Elderly" or "Disabled".

The design, construction, or alteration of HAFC facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the HCV program.

## Sale of Subsidized Housing and Possible Displacement

In the event of the sale of any HAFC owned property, all tenant relocation will be handled in accordance with standards specified under the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs.

HAFC take steps to ensure that such households are provided a varied choice of replacement housing, particularly to give minority displaced households an opportunity to select housing outside-not just inside-minority-concentrated areas.

For displacement and ensuring that persons with disabilities can choose housing in a variety of accessible locations, HAFC's policy is in accordance with standards specified under the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs.

The City of Sandy Springs is currently developing its new Zoning Code expected to be adopted in August 2017. The code requires parking to be accessible and conform to the American with Disabilities Act (ADA), the State Building Code, and the American National Standards Institute. It also provides exceptions for Minor Land Disturbing Activities for structures compliant with the Disabilities Act (ADA).

**c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.**

The American Community Survey does not provide data for homeownership by persons with disabilities nor by the type of disabilities and the City does not currently have local data that address this issue. Based on community and stakeholder input, people with disabilities often face challenges finding for sale or for rental housing that already has the structural accommodations such as grab bars in a bathroom or ramps. Others suggested that availability of ranch homes is becoming more limited through the years since they have been replaced for newer, bigger, and often 2-story houses. It represents a financial burden for people with disabilities to have to make structural improvements when looking for for-sale units and this may limit their housing options. Others suggested that often property owners are not diligent enough when addressing the needs of those individuals with disabilities. Additionally, people with disabilities often have other financial burdens associated with payment of healthcare costs, and it may limit their ability to save efficiently for a down payment when purchasing a home.

## **5. Disproportionate Housing Needs**

**d. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.**

Individuals with disabilities who are unable to work are eligible for Supplemental Security Income (SSI) benefits. According to the Sandy Springs Demographic Profile which has the ACS 2010-2014 data, shows that approximately 623 households in the City receive Supplemental Security Income, however the data does not specify the number of households with a disability nor the type of disability. The mean annual income in dollars for those who receive SSI is estimated to be \$12,287

or \$1,024 per month, which at 30% of income, allows for \$307 of available income for housing costs. This represent a severe housing cost burden to individuals with disabilities who rely on SSI and who do not have any other source of income.

## **6. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.**

No additional relevant information is available at this moment.

**b. The program participant may also describe other information relevant to its assessment of disability and access issues.**

No other relevant information is available at this moment.

## **7. Disability and Access Issues Contributing Factors**

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Land use and zoning laws

## **E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

**1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.**

No information available at this time

**2. Describe any state or local fair housing laws. What characteristics are protected under each law?**

Georgia Fair Housing Act (O.C.G.A. § 8-3-200 et seq.) which is substantially equivalent to the Federal fair housing law, prohibits and promotes the elimination of housing discrimination in residential-real estate transactions on the basis of race, sex, color, familial status (families with children under 18), national origin, disability or handicap, and religion. Additionally, the Georgia Fair Housing Law (O.C.G.A § 8-3-220) prohibits a local government or “political subdivision of this estate” from adopting its own fair housing law by extending protections to other classes outside of those already protected by the Fair Housing Act.

The City of Sandy Springs does not have its own fair housing ordinance.

### ***Fair Housing Act Overview***

President Lyndon Johnson signed the Civil Rights Act into law on April 11, 1968, one week after the assassination of Dr. Martin Luther King, Jr. Title VIII of the Civil Rights Act, commonly known as the Fair Housing Act, states:

“It is the policy of the United States to provide, within Constitutional limitations, for fair housing throughout the United States.”<sup>4</sup>

The law directs all federal executive departments and federal agencies to administer their programs and activities related to housing and urban development in a manner to affirmatively further the purposes of the Act. The Fair Housing Act, as amended, prohibits discrimination in housing and housing related services on the basis of race, color, religion, sex, national origin, disability or familial status.

Prohibited acts of discrimination include but are not limited to:

1. Refusal to sell or rent housing;
2. Falsely denying the availability of housing;
3. Providing different terms, conditions or privileges for the sale or rental of a dwelling unit;
4. Blockbusting, steering or redlining;
5. Denying access to or membership in a facility or service related to the sale or rental of housing;
6. Refusing to make a mortgage loan;
7. Refusing to provide information regarding the availability of loan products and services
8. Discriminating in appraising property; or
9. Setting different terms or conditions in the pricing of a loan product.

The Fair Housing Act was amended to include protections for disabled persons and families with children in 1988. It is unlawful to refuse to make reasonable accommodations in rules, policies, practices or services if such an accommodation is necessary for a disabled person to use the housing. Furthermore, landlords must allow reasonable modifications to a dwelling or to common use areas, if necessary for the disabled person to use the housing, specifically ensuring that all doors and

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<sup>4</sup> 42 U.S.C. Sec. 3601  
City of Sandy Springs AFH

hallways are an acceptable width for wheelchairs. Multifamily dwellings that have four or more units that were ready for first occupancy after March 31, 1991, are covered by the Fair Housing Act, which requires that all ground floor units must have:

1. An accessible route into and through the unit;
2. Accessible light switches, electrical outlets, thermostats and other environmental controls;
3. Reinforced bathroom walls to allow later installation of grab bars; and
4. Kitchens and bathrooms useable by persons in wheelchairs.

**3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.**

Atlanta Metro Fair Housing (AMFH) is a nonprofit fair housing agency located in East Point, assists with the enforcement of fair housing laws in the Atlanta area. Residents of the Atlanta metro area can file fair housing complaints with AMFH, who participates in HUD's Fair Housing Initiatives Program (FHIP). This program provides funding to public and private entities that create or carry out programs that prevent or eliminate discriminatory housing practices. Funding provided through FHIP supports projects and activities that are designed to enhance compliance with the Fair Housing Act and substantially equivalent State and local laws prohibiting housing discrimination. These activities include programs of enforcement, voluntary compliance, and education and outreach.

The Housing Authority of Fulton County (HAFC) seeks to address the need for decent, safe, sanitary, and affordable housing in unincorporated Fulton County. Its mission is to create housing opportunities for low- to moderate-income citizens of Fulton County and to make quality affordable housing an engine for positive change in Fulton County. The HAFC seeks to administer and develop housing opportunities for citizens of low to moderate incomes. The Authority has provided not only housing stock, but also essential self-sufficiency skills crucial to assisting residents in moving up and out of public housing.

The Georgia Commission on Equal Opportunity (GCEO) The Georgia Commission on Equal individuals from discrimination on the bases of race, sex, disability, national origin, color, religion and familial status (children under the age of 18 years).The GCEO is under the supervision of the Office of the Governor. The GCEO has a Board of Directors made up of attorneys and community leaders statewide. The CGEO has two divisions: the Equal Employment Division and the Fair Housing Division. The mission of the Fair Housing Division is to promote broader housing choices in Georgia by promoting understanding of the Georgia Fair Housing Act and the federal FHA. The GCEO seeks to encourage the integration of communities and secure compliance with state and federal fair housing laws. The GCEO has the authority to administer and enforce fair housing rights.

The Metropolitan Planning Organization, the Atlanta Regional Commission, provides an excellent source of information not only regarding efforts of Atlanta metro communities, but also regarding jurisdictions across the nation. The ARC has conducted training and information sessions regarding inclusionary housing, work force housing and alternative Zoning Codes highlighting innovations in these areas. There has been an enhanced effort to provide a variety of housing types within Sandy Springs as well as throughout the region. This effort has resulted in rezoning approvals that provide for denser housing - both owner occupied and rental near activity centers.

The U.S. Department of Housing and Urban Development's Region IV Atlanta office is a resource for fair housing information, as well as for the filing of fair housing complaints. Specifically, the mission of the Office of Fair Housing and Equal Opportunity (FHEO) is to create equal opportunities for all persons by enforcing laws that prohibit discrimination based on race, color, religion, sex, national origin, disability and familial status. In addition to enforcing fair housing laws, FHEO also establishes national policies that ensure all Americans have equal access to the housing of their choice.

The City of Sandy Springs Website provides fair housing information using the Community Development Block Grant Program webpage by providing links to services related to down payment assistance, homeownership and foreclosure counseling, affordable housing information, financial, medical and legal service assistance.

The Community Assistance Center located in Sandy Springs is a not-for-profit organization that provides assistance to meet basic needs such as utilities, food and clothing and actively engage individuals to work towards greater self-sufficiency. CAC is a cornerstone of the human services network in the northern Perimeter area. Since 1987, CAC has helped more than 17,000 households cope with financial hardship.

In addition to the CAC, Mary Hall Freedom House is located in Sandy Springs. This agency provides transitional housing and homelessness prevention services for women and for women with children seeking shelter from domestic violence and in need of supportive services to eliminate substance abuse. The Reaching New Heights (RNH) and Higher Ground II (HG2) programs are HUD-funded Supportive Housing programs located in a local apartment development in Sandy Springs. RNH is a 17-unit transitional housing program that serves homeless, single women and women with children. HG2 is a permanent housing program that serves chronically homeless single women, with a capacity of 60 beds.

The Drake House provides 15 transitional housing units for up to 90 days to homeless single mothers with one or more children and provides life skill classes such as job readiness, personal finances, parenting skills, computer skills, and health and wellness.

Homestretch provides 27 transitional housing units for none to twelve months to a homeless family or a family immediately with being homeless with children and also provides life skill classes.

Sandy Springs Mission provides after-school programs and food/clothing assistance.

#### **4. Additional Information**

**a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.**

#### **Complaints filed with the Georgia Commission on Equal Opportunity (GCEO)**

The Georgia Commission on Equal Opportunity maintains a database of all fair housing complaints filed in Fulton County. The year 2010 had the highest number of complaints related to disability and race compared to other years. Sex and familial status complaints are second with the highest number of complaints received in 2010, as depicted in the table below.

For complaints during 2010, discriminatory terms, conditions and privileges for the provision of services and facilities as well as failure to provide reasonable accommodation was the most common issue. In 2015, there were 5 complaints filed, 4 of them related to disability, and 1 related to race, and sex. Discriminatory issues involve refusal to rent, deny or make housing unavailable, false representation of rental, provision of services and facilities, and failure to make or permit reasonable accommodation. The only complaint filed in 2016 was on the basis of disabilities with discriminatory issues related to failure to make reasonable accommodations, coercion, intimidation, and harassment. The status for complaints filed in 2016 and 2017 are pending.

**Table 17: Total Number of Fulton County Fair Housing Complaints between 2010-2016: 80**

<u>Basis</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>Total</u>
<u>Disability</u>	<u>28</u>	<u>2</u>	<u>1</u>	<u>5</u>	<u>2</u>	<u>3</u>	<u>0</u>	<u>41</u>
<u>Race</u>	<u>27</u>	<u>0</u>	<u>1</u>	<u>2</u>	<u>2</u>	<u>4</u>	<u>1</u>	<u>37</u>
<u>National Origin</u>	<u>8</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>9</u>
<u>Color</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>0</u>	<u>6</u>
<u>Religion</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>1</u>
<u>Sex</u>	<u>12</u>	<u>0</u>	<u>0</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>0</u>	<u>17</u>
<u>Familial Status</u>	<u>8</u>	<u>0</u>	<u>0</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>0</u>	<u>11</u>
<b><u>Total Basis</u></b>	<b><u>85</u></b>	<b><u>3</u></b>	<b><u>3</u></b>	<b><u>8</u></b>	<b><u>8</u></b>	<b><u>12</u></b>	<b><u>1</u></b>	<b><u>122</u></b>
<b><u>Total Complaints</u></b>	<b><u>59</u></b>	<b><u>3</u></b>	<b><u>3</u></b>	<b><u>4</u></b>	<b><u>4</u></b>	<b><u>4</u></b>	<b><u>1</u></b>	<b><u>80</u></b>

### Housing Discrimination Complaints filed with HUD

The Atlanta regional office of the Fair Housing and Equal Opportunity (FHEO) maintains a database of all fair housing complaints filed with HUD along as the bases and issues related to the complaint. The table below shows a total of 32 complaints received by HUD from January 2010 to December 2016. The most common bases are related to race, national origin and disability. Issues include denying or making housing unavailable, as well as discrimination in terms, conditions, privileges relating to rental housing and facilities. As of June 26, 2017, 30 of the reported complaints have been closed. Almost half of the complaints or 16 out of 32, were closed due to no cause determination, after HUD's investigation and findings of no reasonable cause to believe that housing discrimination occurred or was about to occur. Additionally, 4 complaints were withdrawn by complainant after resolution, 1 complaint elected to go to court, 3 complaints were closed due to complainant not willing to cooperate or because the complainant was not able to be located. A total of 7 complaints were successfully closed in conciliation and one ended up in settlement in favor of the complainant totaling \$13,000.

**Table 18: Total Number of HUD Complaints in the City of Sandy Springs between January 1, 2010 through December 31, 2016: 43**

Basis	2010	2011	2012	2013	2014	2015	2016	Total
Disability	2	2	0	1	1	1	0	7
Race	0	3	3	4	3	1	1	15
National Origin	2	1	2	2	1	1	0	9
Color	0	1	1	0	0	0	0	2
Religion	0	0	0	0	0	0	0	0
Sex	0	1	0	0	0	0	0	1
Familial Status	2	0	0	3	1	0	0	6
Retaliation	0	0	0	1	1	1	0	3
<b>Total Basis</b>	<b>6</b>	<b>8</b>	<b>6</b>	<b>11</b>	<b>7</b>	<b>4</b>	<b>1</b>	<b>43</b>
<b>Total Complaints</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>8</b>	<b>4</b>	<b>4</b>	<b>1</b>	<b>32</b>

**Table 19: HUD Fair Housing Complaints by Issue in the City of Sandy Springs between January 1, 2010 through December 31, 2016: 43**

Of the total 32 complaints received , the most common issues are related to discriminatory terms, conditions, privileges relating to rental housing and facilities as well as denying or making housing unavailable.

<u>Issue</u>	<u>Total</u>
<u>Discriminatory advertising, statements and notice</u>	<u>5</u>
<u>Discrimination in terms/conditions/privileges relating to sale</u>	<u>2</u>
<u>Discrimination in terms/conditions/privileges relating to rental</u>	<u>10</u>
<u>Discriminatory terms, conditions, privileges, or services and facilities</u>	<u>14</u>
<u>Otherwise deny or make housing unavailable</u>	<u>10</u>
<u>False denial or representation of availability – rental</u>	<u>3</u>
<u>Failure to make reasonable accommodation</u>	<u>6</u>
<u>Discriminatory acts under Section 818 (e.g. coercion)</u>	<u>9</u>
<u>Discriminatory refusal to negotiate for rental</u>	<u>2</u>
<u>Discriminatory refusal to rent</u>	<u>7</u>
<u>Discriminatory financing (includes real estate transactions)</u>	<u>1</u>
<u>Adverse action against an employee</u>	<u>1</u>
	<u>75</u>

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

**5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.*

- Lack of local private fair housing outreach and enforcement
- Lack of resources for fair housing agencies and organizations

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## VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.
2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement. [To be determined with Mayor and Council policy direction]

### Contributing Factors Summary

The following provides a summary of the contributing factors identified for each of the housing issues based on analysis and feedback received through the public and stakeholder engagement. Priority levels have been assigned to each of the selected contributing factors, defined as follows:

- High: Factors that significantly limit or deny fair housing choice or access to opportunity.
- Medium: Factors that moderately limit or deny fair housing choice or access to opportunity.
- Low: Factors that have limited impact on fair housing issues.

Contributing Factor	Priority	Discussion
<b>Segregation/Integration</b>		
Displacement of residents due to economic pressures.	Medium	<p><b>A.</b> Meeting participants raised concern about growth pressures continuing to increase rents and starter home price-points. Some reported currently seeking residence outside of the City or with family. The City adopted the Next 10 Comprehensive Plan in February 2017, in which the City commits to: “adopt[ing] workforce housing policies and programs directed at improving affordability of rental and/or for sale housing for middle income households.” To implement this policy, the new Development Code (August 2017 target date) provides (1) requirements for workforce unit set-asides and (2) incentives for the redevelopment of aging large apartment complexes into mixed-use and mixed-income development. This requirement will help create more affordable units with lower rents in new multi-family developments. These regulations aim to mitigate against potential displacement of existing residents due to rising housing values and rent rates.</p>
Location, type, quality, of affordable housing	High	<p><b>B.</b> Most of the available affordable housing units are located within rental complexes which provide around 22,000 dwelling units. According to county tax assessor’s data, around 60% of these were constructed between 1950 and 1980. Since incorporation, the City of Sandy Springs has worked to improve the physical conditions of these aging complexes through a monthly program of apartment sweeps. While resulting in greater aesthetic and basic environmental improvements, some renters reported interior conditions as lacking; increasing tenant confidence to contact Code Enforcement officers may help improve this. Complaints included issues with flooding, dysfunctional A/C, ceiling and wall holes, water leaks, and rodents. Code Enforcement received over 80 such maintenance complaints in 2016.</p>

Contributing Factor	Priority	Discussion
<b>Segregation/Integration</b>		
Location, type, quality, of affordable housing	High	<b>B. Cont'd</b> Additionally, the stock of lower priced single-family homes continues to decrease as land values create economic pressure for new infill. However, new affordable units will be delivered under the new proposed zoning requirement to dedicate set-asides for 60-80% AMI, depending on the specific project.
Land Use and Zoning Laws	Low	<b>C.</b> The historic zoning ordinance inherited from Fulton County generated typical suburban development patterns with large areas of the city dedicated primarily to large lot, single family homes. This pattern and the location of these neighborhoods at the center of office and medical employment and at the interchange of I285 and GA 400 - the most convenient access for travel anywhere in the region – help make this some of the highest valued residential real estate in the region. Recognizing these factors, the City’s new Zoning Code draft aims to achieve the Policy Goal of achieving greater balance of housing choice through allowing more product housing types and inclusionary zoning requirements.
<b>Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)</b>		
Lack of private investment in specific neighborhoods	Medium	<b>D.</b> Although the data shows no areas in the City where concentrations of poverty coincide strongly with racially concentrated neighborhoods, a few neighborhoods vulnerable to this potential do exist. In the Next 10 Comprehensive Plan, the City identifies redevelopment and investment desirable for the areas along the northern end of Roswell Road, as well as areas in the existing Opportunity Zone, south of I-285 along Roswell Road, which include the vulnerable neighborhoods. Further, these are both areas benefitting from the CDBG grant used to invest in sidewalk infrastructure.

Contributing Factor	Priority	Discussion
<b>Racially/Ethnicly Concentrated Areas of Poverty (R/ECAP)</b>		
Deteriorated and abandoned properties	High	<b>E.</b> The City’s Code Enforcement division tracks and routinely inspects the handful of properties inventoried as vacant. Deteriorating properties are few, due to the dedicated monthly apartment sweeps, but complaints received include water leaks, and flooding, holes in walls and ceilings, and the lack of cooperation and diligence from part of the property management to properly repair those units in a timely manner. One older, owner-occupied condominium complex resident reports challenges contending with the lack of stormwater infrastructure on the property. Code Enforcement provides housing services information to tenants who are victim to problems, and this is a service area the AFH document considers expanding. In order to protect the health and safety of residents, the Code Enforcement Division performs on average 12 apartment sweeps per year and 12 re-inspections by rotating 75+ properties over the course of 5 years. Notice of violations are also issued to keep code compliance.
Displacement of residents due to economic pressures.	Medium	<b>F.</b> Several participants of the community meetings for the AFH reported rising rents in the past few years The City has received anecdotal evidence that some tenants experience pressures to relocate due to increased monthly rents. This requires additional data analysis, which will be included in the financial analysis that the Comprehensive Plan includes in the five year Community Work Program for 2018.
Location and type of affordable housing	High	See above. B.
<b>Disparities in Access to Opportunities</b>		
Availability of affordable units in range of sizes	High	<b>G.</b> While housing type and location is likely a contributing factor, data did not indicate great disparities in access. The City of Sandy Springs provides a number of affordable rental units - the Comprehensive Plan reports that the majority of renters in the City have monthly housing costs of \$800 to \$1,500 and approximately 7,600 units lease for cost less than \$800.

Contributing Factor	Priority	Discussion
<b>Disparities in Access to Opportunities</b>		
Availability of affordable units in range of sizes	High	<b>G. Cont'd</b> However there exist only limited range of units by size; contributing to this disparity was the prior Zoning Code inherited from Fulton County, which allowed only up to 5% of total units in multi-family developments to be 3-bedroom. 2016 data showed 1,553 3-bedroom units and 25 4-bedroom units. The City has approximately 22,000 rental units total. Although the City has a high median income, about one-fourth of all households earn less than \$35,000 annually.
Lack of private investment in specific neighborhoods	Medium	See above D.
Land Use and Zoning Laws	Low	See above C and G. The City aims to adopt new regulations in August 2017.
Location of proficient schools and school assignment policies	Medium	<b>H.</b> Mapping tools provided by HUD documenting a School Proficiency Index suggest that areas scoring only moderately well coincide with the integrated areas of the City and the areas scoring high on the index (80 or 90 out of 100 point index) coincide with white majorities (over 80%). Public school stakeholders reported concern about individual schools with high concentrations of one or more race or ethnic population(s) and voiced an interest in re-examining school district lines. Other stakeholders pointed out the large number of households preferring private schools over the locally available schools, thus creating an imbalance in public school population in terms of income, race and performance. Overlaying the Fulton County School District boundary map over population distribution by race shows that at least for two elementary school districts, boundary lines coincide with census blocks of high minority concentrations. The School District reported that this arises because district boundaries work to provide neighborhood schools, aimed to avoid lengthy trips for students.

Contributing Factor	Priority	Discussion
<b>Disparities in Access to Opportunities</b>		
The availability, type, frequency, and reliability of public transportation.	Medium	<b>I.</b> Even though the City benefits from a number of MARTA bus stops along major roads which provide access to public transit, bus routes in the City consist mainly in south and north bound connections. The only east and west bound connection offered is Route 148, operating only weekdays from 6 am to 7 pm. This may represent a challenge for individuals who often work 2 <sup>nd</sup> and 3 <sup>rd</sup> shifts and/or on the weekends. Further, mapping rents along Roswell Road shows that primarily moderate and high rental units located in close proximity to the primary route. The MARTA rail stations are on the east side of GA-400 and serve commuters from the perimeter north (North Springs Station) and the Perimeter business market (Sandy Springs and Medical Center stations).
<b>Disproportionate Housing Needs</b>		
Availability of affordable units in range of sizes	High	<b>J.</b> Analyzing the cost-burden status of City households, the AFH shows that around 6,000 households experience high cost burden conditions, where 50% or more of the household income is spent on housing (2013-2015 HUD data). Nearly 50% of Black and 60% of Hispanic households were likely to experience cost burden conditions and other housing problems, compared to 30% of the White population reporting these issues. About half of households with high cost burden were White and about one-third were Black.
<b>Disproportionate Housing Needs</b>		
Displacement of residents due to economic pressures.	High	See above A.
Lack of private investment in specific neighborhoods	High	See above D.

Contributing Factor	Priority	Discussion
<b>Publicly Supported Housing</b>		
Quality of affordable housing information programs	Low	<b>K.</b> Publicly supported housing is managed by the Fulton County Housing Authority and not by the City. The City provides support to the Community Assistance Center, a non-profit that provides information regarding housing availability and fair housing practices, among other services.
<b>Disability and Access</b>		
Lack of affordable, accessible housing in range of unit sizes.	High	<b>L.</b> People with disabilities often face challenges finding either for-sale or for-rent housing that is already accessible or that can be easily modified with features such as no-step entries, grab bars in bathroom or ramps. Additionally, availability of single-story homes is becoming more limited as pressures for infill tend to replace that stock with larger, often 2-story housing product. It adds a financial burden for people with disabilities to have to make structural improvements when seeking for-sale units, often limiting their housing options.
<b>Fair Housing Enforcement, Outreach Capacity, and Resources</b>		
Lack of local private fair housing outreach and enforcement	Medium	<b>M.</b> The City typically conducts an annual set of workshops to disseminate information on fair housing, in addition to information on the website and through Code Enforcement contact with property managers and those reporting housing problems. The Community Assistant Center also makes information available to those seeking their services. Local radio stations also provide public announcements regarding discrimination in renting practices and resources for learning about Fair Housing Law and legal assistance. The City now has a full-time planner dedicated to housing analysis, work program and communications, in addition to the work Code Enforcement officers conduct related to apartment sweeps and remedying housing maintenance problems.

**Fair Housing Goals** [The following are examples of goals developed by Staff for City Manager and Elected Officials to consider].

Fair Housing Goals	Contributing Factors Addressed	Fair Housing Issues	Metric, Milestones, and Timeframe for Achievement	Responsible Program Participant
<p><b>Launch Initiative to Implement the Next 10 Housing Work Program</b></p>	<p>Displacement of residents due to economic pressure.</p> <p>Location and type of affordable housing</p> <p>Access to financial services</p> <p>Housing accessibility modifications</p>	<p>Disparities in access to opportunity</p> <p>Disabilities and Access</p>	<p>In 2018 assign a dedicated Planner to prepare detailed work program to execute goals and tasks identified in the Next 10</p>	<p>Community Development Department, Planning &amp; Zoning Division</p>
<p><b>Perform Housing Financial Analysis and Research, Identified in the Economic Development Chapter of the Next 10</b></p>	<p>Location and type of affordable housing</p> <p>Deteriorated and abandoned properties</p> <p>Lack of affordable, accessible housing in range of unit sizes.</p>	<p>Disproportionate Housing Needs</p> <p>Disparities in access to opportunity</p> <p>Disabilities and access</p>	<p>White paper detailing results of research and financial analysis, including potential for public-private-partnerships achieving the policy objectives defined in the Next 10</p>	<p>Economic Development Department, with Planning &amp; Zoning staff assistance</p>
<p><b>Strengthen partnerships with agencies providing housing information and services</b></p>	<p>Location and type of affordable housing</p> <p>Access to financial services</p>	<p>Disparities in access to opportunity</p> <p>Disproportionate Housing Needs</p>	<p>Prepare and execute schedule of meetings and joint events with the Metro Atlanta Fair Housing, Inc. and the Georgia Commission on Equal Opportunity in partnership with Fulton County Schools and the Community Assistance Center.</p> <p>Communicate results and actions of the Regional Housing Task Force, as founding members of this new entity.</p> <p>Enhance existing city webpages with additional links and information to agencies</p>	<p>Planning &amp; Zoning Staff; Communications; Code Enforcement</p>

Fair Housing Goals	Contributing Factors Addressed	Fair Housing Issues	Metric, Milestones, and Timeframe for Achievement	Responsible Program Participant
<p><b>Expand Fair Housing outreach, education and enforcement.</b></p>	<p>Location and type of affordable housing</p> <p>Availability of affordable units in range and sizes.</p> <p>Quality of affordable housing information programs.</p> <p>Lack of affordable, accessible housing in range and unit sizes</p> <p>Lack of local private fair housing, outreach, and enforcement</p>	<p>Disparities in access to opportunities</p> <p>Disproportionate housing needs</p> <p>Disability and access</p> <p>Fair housing enforcement, outreach capacity, and resources</p>	<p>Continue to conduct annual fair housing workshop, as done through 2015</p> <p>Update the existing housing website that features information such as well as provide fair housing law information available in other languages and formats.</p> <p>Strengthen partnerships with the Community Assistance Center and other private and public housing agencies and owners to communicate fair housing protections and rights to residents.</p> <p>Create opportunities for multifamily complexes to receive training and information related to fair housing related to discrimination, property maintenance, and code violations.</p> <p>Create a list of organizations in the City and immediate region that provide services to people with disabilities to expand information to residents.</p>	<p>Community Development Department, CDBG Manager and Code Enforcement Division.</p>
<p><b>Delivery and preservation of affordable and workforce rental housing</b></p>	<p>Land use and zoning laws</p> <p>Lack of private investments in specific neighborhoods</p> <p>The availability of affordable units in range and sizes</p> <p>Location and type of affordable housing</p>	<p>Disproportionate housing needs</p> <p>Disparities in access to opportunity</p>	<p>Monitor the performance of new Zoning Code targeted for August 2017 adoption.</p> <p>Through partnerships with public and private organizations encourage the preservation and affordability of housing for low-income households and encourage private investments in lower opportunity areas, as well as the renovations of existing housing units that are in poor conditions.</p>	<p>Community Development</p>

Fair Housing Goals	Contributing Factors Addressed	Fair Housing Issues	Metric, Milestones, and Timeframe for Achievement	Responsible Program Participant
<b>Preserve Existing affordable homeownership</b>	The availability of affordable units in range and sizes	Disproportionate housing needs Disparities in access to opportunity	Prepare analysis of naturally occurring affordable homes and work with CAC to support programs promoting home ownership and financial literacy programs.	Community Development

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**Appendix A**

**Public Notices, Fliers, and Sign-in sheets.  
(To be incorporated)**

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## Appendix B

### Comments from Community Meetings and Stakeholder Meetings:

#### Demographics:

- AFH Maps look accurate, perhaps making them more easy to understand and friendly to the community would be better.
- Race distribution corresponds to age of housing.
- The Northwood area (just south of I-285, west of Roswell Rd) is culturally and generationally diverse, with fixed income condominium owners.
- People tend to live closer to people with the same culture/race.
- Most people felt the neighborhood where they live is diverse.
- 

#### Housing:

- The City faces the issue called “missing middle;” The City should provide a ladder of housing affordability.
- Include standard affordable housing.
- People have stagnant income levels while housing prices increase, prevents easy access.
- There are about 3 elderly residential complexes that have approximately 2 and 3-year waiting list.
- Housing for disability community face limited housing availability.
- Special needs populations do not have easy access to affordable handicapped apartments.
- There are high volumes of housing that have high prices limiting affordability.
- Substandard housing or housing getting torn down.
- Rent prices are going up making families to move somewhere else they can afford, impacting the enrollment of students in schools and job force.
- High housing prices incite several families to live together to be able to afford staying in the City and creates overcrowding.
- Existing affordable apartments are aging and will be torn down and will be replaced for new types of development in 20 and 50 years.
- The workforce is an essential economic drive, if there is a lack of housing that is affordable people will choose to move somewhere else.
- Zoning should be in place to require mandates.
- There are apartments in specific areas of the City that are in very poor conditions. The community should be more educated in how to invite Code Enforcement to solve those issues.
- Educate about internal building codes.
- Provide legal protection for whistle blowers so that residents are not afraid of losing lease or retaliation.
- Work with non-profits because homeowners trust them.
- The teardown of houses creates displacement of households.

- Rents are more than mortgages, people are not able to afford to live in the City.
- The City should provide means to keep the elderly by providing housing that is affordable to them within the City.
- City should require certain percentage to be set aside for affordable housing in new development
- Rent increases through time. People cannot keep up.
- If the City was to establish a housing program based on income, how are people supposed to be informed on these programs?
- Who told you? Response from landlords on affordable apartments. There is a sense that affordable housing units is classified information when people ask for information.
- People are worried about apartments being torn down due to all the development that is happening currently

### Transportation

- Insufficient transportation infrastructure.
- Children who want to attend summer schools have limited transportation options and some cannot attend.
- There are families that work 3 shifts and there is no transportation available after regular hours, especially east and west routes.
- Northriver Parkway does not have MARTA routes, no access to transportation.
- Transportation needs to work with neighboring jurisdictions.
- Large portion (30%) of students go to private schools generating traffic congestion.
- AFH should look beyond borders, for example: Brookhaven, Dunwoody, Roswell, Cobb County.
- MARTA only runs at certain periods, this does not help people who have 2 or 3 shifts that need access to public transportations to get to their jobs. Express services should be provided.
- MARTA seems unsafe for certain people at late hours of the day, some people would feel discouraged to use it.
- No sidewalks to get to school
- Some schools do not offer school bus during the summer for summer school and programs. Children are not able to be part of summer school due to lack of transportation access.
- When people do not use MARTA as their form of transportation, they use Uber, taxis, or Lift.
- Access of school bus to enter apartment complex to pick up children with disabilities. These apartment complexes often do not provide the accommodation necessary.

### Schools

- The schools are a reflection of the surrounding population.
- Lake Forest Elementary is 96% Hispanic.

- Labeling is an issue. Fulton county school districts labels “under performing schools” this causes people to not want to live in these areas.
- Schools are too big perhaps making them smaller will create more efficiency and will make the schools more successful.
- Teachers cannot afford to live in the City and have to commute long hours to go to work declining staff.
- Teachers decide to find jobs closer to where they live.
- Issue for school performance when there is high student-turn over and teacher-turn over due to high housing costs.
- People who live in specific areas of the City have easy access to quality private schools due to income and the location where they live. However, there are people who cannot afford private schools and are subject to the schools where they reside.
- No affordable day-care for families.
- Families like living in Sandy Springs because their children have access to schools where they live.

#### Employment

- People said that they had good access to jobs in terms of proximity
- Others suggested that they are contemplating on moving somewhere else because rental housing costs are rising every year, while they income remains the same.
- Sandy Springs is growing and there is new development going on that will open new more jobs, along with the jobs the City should be providing means of housing affordability to stay in Sandy Springs.

## Appendix C

### **Fulton County Housing Authority Application/Tenant Selection/Assignment Policies**

#### **PUBLIC HOUSING:**

When a family wishes to reside in public housing, the family must submit an application that provides the Housing Authority of Fulton County, Georgia (“HAFC”) with the information needed to determine the family’s eligibility. HUD requires HAFC to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, HAFC must select families from the waiting list in accordance with HUD requirements and HAFC policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

HAFC is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or HAFC to receive preferential treatment.

HUD regulations require that HAFC comply with all equal opportunity requirements and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in the ACOP ensures that HAFC will be in compliance with all relevant fair housing requirements, as described in the ACOP.

#### **HOUSING CHOICE VOUCHER:**

When a family wishes to receive assistance under the Housing Choice Voucher (“HCV”) program, the family must submit an application that provides HAFC with the information needed to determine the family’s eligibility. HUD requires HAFC to place all families that apply for assistance on a waiting list. Currently, the HCV Waiting List is closed. When HCV assistance becomes available, HAFC must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

HAFC is required to adopt clear policies and procedures for accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow these policies and procedures consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or HAFC that justify their selection. Examples of this are the selection of families for income targeting and the selection of families that qualify for targeted funding.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that HAFC affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that HAFC will be in compliance with all relevant fair housing requirements, as described in the HAFC Administrative Plan.

There is no pattern in one or more assisted housing developments of concentration of tenants by race or Ethnicity. Additionally, The Housing Authority of Fulton County, Georgia (“HAFC”) does not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called “protected classes”). HAFC complies fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment.

### **PHA Policy for Rejecting Units while on Waiting List**

HAFC has adopted a “two-to-three offer plan” for offering units to applicants. Under this plan, HAFC will determine how many locations within its jurisdiction have available units of suitable size and type in the appropriate type of project. The number of unit offers will be based on the distribution of vacancies. If a suitable unit is available in:

Three (3) or more locations: The applicant will be offered a unit in the location with the highest number of vacancies. If the offer is rejected, the applicant will be offered a suitable unit in the location with the second highest number of vacancies. If that unit is rejected, a final offer will be made in the location with the third highest number of vacancies. The offers will be made in sequence and the applicant must refuse an offer before another is made.

Two (2) locations: The applicant will be offered a suitable unit in the location with the higher number of vacancies. If the offer is rejected, a final offer will be made at the other location. The offers will be made in sequence and the applicant must refuse the first offer before a second offer is made.

One (1) location: The applicant will be offered a suitable unit in that location. If the offer is rejected, the applicant will be offered the next suitable unit that becomes available, whether it is at the same location as the first offer or at another location. The second unit offer will be the final offer, unless there is good cause for refusing the offer. If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.

### **TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL**

Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer. Offers made by telephone will be confirmed by letter.

### **REFUSALS OF UNIT OFFERS**

#### **Good Cause for Unit Refusal**

An elderly or disabled family may decline an offer for designated housing. Such a refusal must not adversely affect the family's position on or placement on the public housing waiting list [24 CFR 945.303(d)]. Applicants may refuse to accept a unit offer for “good cause.” Good cause includes situations in which an applicant is willing to move but is unable to do so at the time of the unit offer, or the applicant demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the applicant’s race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to HAFC's satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.

The family demonstrates to HAFC's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders, other court orders, risk assessments related to witness protection from a law enforcement agency, or documentation of domestic violence, dating violence, sexual assault or stalking in accordance with section 16-VII.D of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption.

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on final application) or live-in aide necessary to the care of the principal household member.

The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move.

The unit has lead-based paint and the family includes children under the age of six.

In the case of a unit refusal for good cause the applicant will not be removed from the waiting list as described later in this section. The applicant will remain at the top of the waiting list until the family receives an offer for which they do not have good cause to refuse. HAFC will require documentation of good cause for unit refusals.

### **Unit Refusal without Good Cause**

When an applicant rejects the final unit offer without good cause, HAFC will remove the applicant's name from the waiting list and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so under the HAFC Administrative Plan. The applicant may reapply for assistance if the waiting list is open. If the waiting list is not open, the applicant must wait to reapply until HAFC opens the waiting list.

### **Section 8 Certificates/Vouchers**

Freedom housing choice is a hallmark of the housing choice voucher (HCV) program. In general, HUD regulations impose few restrictions on where families may live or move with HCV assistance. The HAFC Administrative Plan sets forth HUD regulations and PHA policies governing moves within or outside HAFC's jurisdiction. The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in HAFC's jurisdiction and may also be eligible to move under portability to other PHAs' jurisdictions.

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another

PHA is known as portability. HAFC that issues the voucher is called the initial PHA. HAFC that has jurisdiction in the area to which the family wants to move is called the receiving PHA.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA provides all housing services for the family and bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance with its own program funds, and the initial PHA has no further relationship with the family. The initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the initial PHA's voucher. Based on the receiving PHA's response, the initial PHA must determine whether they will approve or deny the portability request [Notice PIH 2012-42].

PHAs commonly act as both the initial and receiving PHA because families may move into or out of their jurisdiction under portability. Each role involves different responsibilities. HAFC will follow the rules and policies in section 10-II.B when it is acting as the initial PHA for a family. It will follow the rules and policies in section 10-II.C when it is acting as the receiving PHA for a family.

### **Allowable Moves under Portability**

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. If there is more than one PHA in the area, the initial PHA may choose the receiving PHA [24 CFR 982.355(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside HAFC's jurisdiction under portability. HUD regulations and PHA policy, determines whether a family qualifies.

Under HUD regulations, most applicant families qualify to lease a unit outside HAFC's jurisdiction under portability. However, HUD gives HAFC discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance.

In determining whether or not to deny an applicant family permission to move under portability because the HAFC lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in section 10-I.B of this chapter.

In addition, HAFC may establish a policy denying the right to portability to nonresident applicants during the first 12 months after they are admitted to the program [24 CFR 982.353(c)].

If neither the head of household nor the spouse/co-head of an applicant family had a domicile (legal residence) in the HAFC's jurisdiction at the time that the family's initial application for assistance was submitted, the family must lease a unit within the initial PHA's jurisdiction for at least 12 months before requesting portability.

HAFC will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2) or reasons related to domestic violence, dating violence, and sexual assault or stalking.

However, any exception to this policy is subject to the approval of the receiving PHA [24 CFR 982.353(c)(3)].

The initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. The Violence against Women Act of 2013 (VAWA) creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of a family member who is or has been a victim of domestic violence, dating violence, sexual assault or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.353(b)].

H AFC will determine whether a participant family may move out of H AFC's jurisdiction with continued assistance in accordance with the regulations and policies set forth here and in sections 10-I.A and 10-I.B of this chapter. H AFC will notify the family of its determination in accordance with the approval policy set forth in the Administrative Plan.

HUD requires H AFC to assist families in their housing search by providing the family with a list of landlords or other parties known to H AFC who may be willing to lease a unit to the family, or to help the family find a unit. Although H AFC cannot maintain a list of owners that are pre-qualified to participate in the program, owners may indicate to H AFC their willingness to lease a unit to an eligible HCV family, or to help the HCV family find a unit [24 CFR 982.301(b)(11)]. H AFC Policy is that owners that wish to indicate their willingness to lease a unit to an eligible HCV family or to help the HCV family find a unit must notify the H AFC. The H AFC maintains a listing of such owners and provides this listing to the HCV family as part of the informational briefing packet.

The H AFC gives the voucher holders an oral briefing and provides the family with a briefing packet containing written information about the program. Included but not limited to in the briefing packet:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside H AFC's jurisdiction;
- For families eligible under portability, an explanation of portability. H AFC cannot discourage eligible families from moving under portability;
- For families living in high-poverty Census Tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations;

A partial list of documents and information which must be provided in the briefing packet include the following:

- Where the family may lease a unit. For a family that qualifies to lease a unit outside the PHA jurisdiction under portability procedures, the information must include an explanation of how portability works.
- A statement of H AFC policy on providing information about families to prospective owners.
- The HUD brochure on how to select a unit.

- Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form.
- A list of landlords or other parties willing to lease to assisted families or help families find units, especially outside areas of poverty or minority concentration.
- Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to HAFC.
- Maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within its jurisdiction and its neighboring jurisdiction
- Information about the characteristics of these areas including job opportunities, schools, transportation, and other services
- An explanation of how portability works, including a list of portability contact persons for neighboring PHAs with names, addresses, and telephone numbers

### **Initial Inspections**

HAFC conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program. The unit must pass the Housing Quality Standard inspection on or before the effective date of the HAP Contract.

When a family approaches an owner to apply for tenancy, the owner is responsible for screening the family and deciding whether to lease to the family, just as the owner would with any potential unassisted tenant. HAFC has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy.

If the owner is willing, the family and the owner must jointly complete a Request for Tenancy Approval (RTA, Form HUD 52517), which constitutes the family's request for assistance in the specified unit, and which documents the owner's willingness to lease to the family and to follow the program's requirements.

When submitted to HAFC, this document is the first step in the process of obtaining approval for the family to receive the financial assistance it will need in order to occupy the unit. Also submitted with the RTA is a copy of the owner's proposed dwelling lease, including the HUD-required Tenancy Addendum (Form HUD-52641-A). HUD regulations stipulate requirements for the approval of an assisted tenancy.

The owner must be qualified to participate in the program [24 CFR 982.306]. Some owners are precluded from participating in the program, or from renting to a particular family, either because of their past history with this or another federal housing program, or because of certain conflicts of interest. Owner qualifications are discussed later in this chapter.

The selected unit must be of a type that is eligible for the program [24 CFR 982.305(a)]. Certain types of dwelling units cannot be assisted under the HCV program. Other types may be assisted under certain conditions.

The selected unit must meet HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD [24 CFR 982.305(a)]. HAFC will inspect the owner's dwelling unit at least annually to ensure that the unit continues to meet HQS requirements. HAFC must determine that the proposed rent for the unit is reasonable [24 CFR 982.305(a)]. The rent must be

reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises.

At initial lease-up of a unit, if the gross rent exceeds the applicable payment standard, HAFC must ensure that the family share does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)].

The dwelling lease must comply with all program requirements [24 CFR 982.308]. Owners are encouraged to use their standard leases when renting to an assisted family. The HUD Tenancy Addendum includes the HUD requirements governing the tenancy and must be added word-for-word to the owner's lease.

HAFC is responsible for ensuring that very low income families have access to all types and ranges of affordable housing in its jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for HAFC to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in the HAFC's jurisdiction, are willing to participate in the HCV program.

To accomplish this objective, HAFC identifies and recruits new owners to participate in the program. HAFC conducts owner outreach to ensure that owners are familiar with the program and its advantages. HAFC actively recruits property owners with property located outside areas of poverty and minority concentration. These outreach strategies include:

- Distributing printed material about the program to property owners and managers
- Contacting property owners and managers by phone or in-person
- Holding owner recruitment/information meetings at least once a year

During oral briefings, HAFC provides information for families living in high-poverty Census Tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations. In the briefing package HAFC provides families with a list of landlords or other parties willing to lease to assisted families or help families find units, especially outside areas of poverty or minority concentration. Also provided in the briefing package are maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within HAFC's jurisdiction and its neighboring jurisdiction, as well as information about the characteristics of these areas including job opportunities, schools, transportation, and other services.