

# 2019 Consolidated Annual Performance and Evaluation Report (CAPER) Sandy Springs, GA



**SANDY SPRINGS™**  
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## CR-05 - Goals and Outcomes

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

In March 2016, the City completed Phases 1 and 2 of the construction of sidewalks in the southern part of the City along Roswell Road within the eligibility area. The goal for the 2019 Action Plan was to continue with Phase 3 of the South Roswell Road Multiyear Project, with the design, and installation of pedestrian lighting between Roswell Road and GA-400 on Northridge Drive. This phase also included the design, and inclusive environmental work for street scape improvements along Roswell Road South of I-285 to Long Island Drive.

The following items were completed in 2018:

- The design and installation of pedestrian lighting between Roswell Road and GA-400 on Northridge Drive was completed.
- The goal of the South Roswell Road Sidewalk Project is to complete the sidewalk network in the qualified target areas along the Roswell Road corridor from Interstate 285 to Long Island Drive.
- All sidewalk improvements will meet the ADA design standards, and shall require paving accents, street lighting, landscaping and other improvements to complete the sidewalk network.
- No construction on the T0033-7 Roswell Road Streetscape Project was completed in FY2018 (July 1, 2018 – June 30, 2019).

Exhibit A identifies Census Block Group target areas for the City's CDBG investments. Each highlighted Block Group has at least 42.75 percent low-to moderate-income (LMI) residents, which is the City's threshold for LMI benefit as an exception community. The North Roswell Road Multiyear Project has been completed within the target areas shown on the north end of the city.

Exhibit B shows the areas identified for the installation of ADA sidewalk ramps, new sidewalk, street lights and other improvements in the Roswell Road corridor south of I-285 for Phase 3 construction.

### 2019 Project Status Summary

The City has made progress with meeting its 2019 CDBG Program goals, and the CDBG Multiyear Sidewalk Construction Project is on schedule:

- The goal of the South Roswell Road Sidewalk Project is to complete the sidewalk network in the qualified target areas along the Roswell Road corridor from Interstate 285 to Long Island Drive.

- All sidewalk improvements will meet the ADA design standards, and shall require paving accents, street lighting, landscaping and other improvements to complete the sidewalk network.
- This project was under design in 2018 and construction began in the 2019 program year. The contractor was issued Notice to Proceed on 4/27/20.
- Aproximately 2,600 linear feet (about ½ mile) of sidewalk, approximately 35% of the project, has been placed since construction began.
- Items remaining to construct and add include lighting, landscaping, drainage, driveways resurfacing and reconstruction.

### **Section 108 Loan Guarantee Program**

- CDBG regulations 24 CFR Part 570.700 describe a process whereby Sandy Springs can leverage up to 5 times its most recent CDBG allocation from HUD to increase the impact of its CDBG funds and benefit to LMI residents.
- In the summer of 2017, the City applied for an advance on its future CDBG allocations permitted under the Section 108 Loan Program in order to, more efficiently, complete Phase III of the South Roswell Road Multiyear Project. Phase III will include right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicap ramps, and brick pavers from I-285 down to Long Island Drive which are identified LMI (low/moderate income) target areas.
- In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance under Section 108 in the principal amount of \$2.8 million.
- The Section 108 Loan Guarantee Program funds represent the infusion of a considerable amount of funding at once that will have a direct benefit on the LMI residents of the City.
- During 2018, Section 108 funds were not utilized.

### **Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Public Improvements and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4830	4830	100.00%	4830	0	0.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

Sandy Springs did not commit general funds to the 2019 sidewalk construction project; however, the City committed 100% of its 2019 CDBG entitlement allocation to this project. Phase III extends along west side portions of Roswell Road from Long Island Drive to Northwood Drive in the designated areas as shown on Exhibit B.

The City executed its CDBG Program by completing the following in 2019:

- Executed these activities consistently and in compliance with all CDBG regulations;
- No actions or willful inactions were taken to hinder the progress of the projects described in the Consolidated Plan; and
- One-hundred percent (100%) of 2018 CDBG funds were committed to the benefit of low- and moderate-income persons living in the CDBG Target areas described in this report and illustrated on Exhibit A, thus meeting the National Objective for the CDBG Program.

**CR-10 - Racial and Ethnic composition of families assisted**

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	<b>CDBG</b>
White	2,128.28
Black or African American	640.64
Asian	169.4
American Indian or American Native	6.16
Native Hawaiian or Other Pacific Islander	3.08
Two or more races	67.76
<b>Total</b>	<b>3,015.32</b>
Hispanic	437.36
Not Hispanic	3,642.64

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

**Narrative**

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,252,919	468,311.38
Section 108	public - federal	2,872,000	-

Table 3 - Resources Made Available

### Narrative

The following federal funds were made available for the 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 017, 2018 and 2019 program years to accomplish the Goals and Objectives described in the 2008-2012, 2013-2017, and 2018-2022 Consolidated Plans, and the 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019 Action Plans:

Resources	Amount	Expended	Balance
1. 2008 CDBG Entitlement Funds (CDBG1)	\$540,875.00	\$540,875.00	\$0.00
2. 2009 CDBG-R Recovery Act Funds (CDBG R)	\$146,909.00	\$146,909.00	\$0.00
3. 2009 CDBG Entitlement Funds (CDBG2)	\$539,982.00	\$539,982.00	\$0.00
4. 2010 CDBG Entitlement Funds (CDBG3)	\$581,336.00	\$581,336.00	\$0.00
5. 2011 CDBG Entitlement Funds (CDBG4)	\$489,289.00	\$489,289.00	\$0.00
6. 2012 CDBG Entitlement Funds (CDBG5)	\$421,709.00	\$421,709.00	\$0.00
7. 2013 CDBG Entitlement Funds (CDBG6)	\$533,275.00	\$533,275.00	\$0.00
8. 2014 CDBG Entitlement Funds (CDBG7)	\$545,644.00	\$545,644.00	\$0.00
9. 2015 CDBG Entitlement Funds (CDBG8)	\$577,782.00	\$577,782.00	\$0.00
10. 2016 CDBG Entitlement Funds (CDBG 9)	\$592,429.00	\$592,429.00	\$0.00
11. 2017 CDB Entitlement Funds (CDBG 17)	\$574,431	\$574,431.00	\$0.00
12. 2018 CDBG Entitlement Funds (CDBG 18)	\$625,188	\$415,904.16	\$209,283.84
13. 2019 CDBG Entitlement Funds (CDBG 19)	\$627,731.00	\$0.00	\$627,731.00

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
42.75% LMI Census Tracts	100	100%	All funds used for Roswell Road Multiyear Sidewalk Project

Table 4 – Identify the geographic distribution and location of investments

### Narrative

Phase II of the Roswell Road Multiyear Sidewalk Project completed (March 2016) the sidewalk network in the qualified target areas along the Roswell Road corridor from Northridge Road to the Chattahoochee River and along Hightower Trail, specifically within Census Tract 131210101191, 131210101192, 131210101193. The City begun work on the South Roswell Road Multiyear Sidewalk Project on 2017. This

project is still in progress during the 2019 program year. Construction began in April 2019.

Phase III of the South Roswell Sidewalk Project focuses on improving connectivity in CDBG target areas along the Roswell Road transportation corridor. Ultimately, the City desires to construct sidewalks to improve the network in the identified target areas, install required American with Disabilities Act (ADA) improvements and make other improvements to the existing sidewalk network where none currently exists. Phase III consists of two sub-phases. Sub-phase 1, from Long Island Drive to The Prado and Sub-phase 2, from Lake Placid Drive to Northwood Drive. Eligible Census Tracts are 010212-1, 010212-3, 010113-2, 010113-1, 010114-1, and 010114-3.

The geographic allocation of the City's CDBG funds is guided by the determination that these funds can have the greatest impact when targeted to specific areas and leveraged with other local, state and federal investments. The CDBG LMI target area map is attached (Exhibit A). As provide for at 24 CFR Part 570.208(a)(1)(ii), the City may elect to use these target areas to meet National Objective requirements for selected projects that specifically meet the Area Benefit category of activities.

During the summer of 2017, the City applied for an advance on its future CDBG allocations permitted under the Section 108 Loan Program in order to, more efficiently, complete Phase III of the South Roswell Road Multiyear Project. Phase III will include right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicap ramps, and brick pavers from I-285 down to Long Island Drive, which are identified LMI (low/moderate income) target areas.

In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance under Section 108 in the principal amount of \$2.8 million.

The Section 108 Loan Guarantee Program funds represent the infusion of a considerable amount of funding at once that will have a direct benefit on the LMI residents of the City.

#### Exception Status

It is important to also note that HUD has granted the City of Sandy Springs exception status based on the upper quartile calculation that permits the City to apply an LMI (low/moderate income) Area Benefit threshold of 42.75% to these project activities in the designated target areas.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City did not directly leverage its 2019 CDBG funds with general funds; however, with the completion of the construction of Phase II of the sidewalk project and the start of the construction of the South Roswell Road Multiyear Sidewalk Project (Phase III), the City will capitalize on the intersection, paving and other infrastructure investments made by the City, Georgia Department of Transportation (GDOT) and private investors since the City's incorporation in 2005 at various intersections, including Northridge Road and Roswell Road, and Dunwoody Place.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 6 – Number of Households Supported

### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City did not establish goals or objectives for the preservation or development of new affordable housing in Sandy Springs for its CDBG Program for the 2018-2022 Consolidated Planning period. The City analyzed the 2027 Comprehensive Plan and City Center Master Plan to ensure that affordable, workforce housing is encouraged. The City updated its Next 10 Comprehensive Plan in 2017, which encourages a mix of uses and range of housing options by taking steps to expand the City's affordability to middle-income residents and provide support for seniors and other special-needs populations. Also, the City has adopted its new Zoning Code in August 2017, which provides various incentives for the development of

workforce housing. Additionally, the City is expected to complete its first Assessment of Fair Housing by 2024, and expects to include new goals to address fair housing in subsequent Action Plans and Consolidated Plans.

As described in previous sections of the 2019 CAPER, the City has executed a multiyear sidewalk program in the CDBG target areas on Roswell Road. The Housing Authority of Fulton County (HAFC) has elderly housing units in Sandy Springs, as well as approximately 50 Housing Choice voucher participants who are currently living in Sandy Springs.

Almost 60% of the housing units in Sandy Springs are apartments, condominiums and townhomes. These units represent the most affordable housing available in Sandy Springs. An informal survey of apartment developments was completed as part of the Analysis of Impediments to Fair Housing Choice adopted March 2, 2010. Staff surveyed seventy-four apartment developments across the city in August and September of 2009 representing 11,171 rental units. Sixty-two percent of the seventy-four developments had 2-bedroom units priced at or below the median contract rent as published in the 2000 Census (\$796) for Sandy Springs. Sixty-two percent of the twenty-nine developments had 2-bedroom units priced at or below the median contract rent as published in the 2010 Census (\$824) for Sandy Springs.

The Next 10 Comprehensive Plan specified, “there are approximately 42,000 housing units in the city. Of those, 22,000 are rented-occupied, and 20,000 are owner-occupied. The city is comprised of 53% renters, with the renter households tending to be lower income than the ownership households. The majority of renters have monthly housing cost of \$800 to \$1,500 per month, while most owners pay \$2,000 or more per month. There are approximately 7,600 units of housing in the city with a cost of less than \$800 per month; proportionally, these make up 18% of all units in the city.” (page 52)

**Discuss how these outcomes will impact future annual action plans.**

Based on the current availability of affordable housing, the City does not anticipate providing for new units or programs in future Annual Action Plans.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

The City did not allocate any of its CDBG Program funds in 2019 to this activity category. However, the Analysis of Impediments was adopted on February 3, 2015, as described earlier, and outreach activities to promote fair housing in Sandy Springs have been identified for future implementation. The City is required to submit the new Assessment of Fair Housing by 2024, replacing the previous Analysis of Impediments.

For 2018, the City did not participate in the HOME Investment Partnerships Program (HOME), or the American Dream Down payment Initiative Program (ADDI), which are affordable housing programs administered by Fulton County.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

### **Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

While the City did not dedicate CDBG funds in 2019 to addressing homeless needs. There are two well-established nonprofit social service providers who address homelessness as part of their service mission in Sandy Springs.

The Community Assistance Center (CAC) provides services to persons in need and those threatened with homelessness in Sandy Springs and Dunwoody. The CAC also provides a Youth Enrichment Program; short-term financial assistance with rent, mortgage and utility payments; and a food pantry and thrift shop. The CAC receives support from a variety of public, private, foundation, faith-based and individual contributors. Many of the clients served by the CAC rely on public transit and walk to the CAC to obtain services. As described previously, the City has completed construction of Phase I (Hightower Trail) directly benefiting the clients who receive assistance from the CAC. The City also provides a Certificate of Consistency with the Consolidated Plan for the CAC each year so that the agency may apply to the Georgia DCA for funding to support its service delivery and programs.

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 City is also included in the HUD Continuum of Care planning process and has the option to refer homeless residents in Sandy Springs to the Gateway Center, the Jefferson Place Homeless Shelter and to other facilities and services as needed.

According to the 2012-2016 American Community Survey, among the civilian noninstitutionalized population, the City has close to 6,493 residents with a disability. Approximately 1.8% under the 18 years of age are disabled, 4.2% between 18 and 64 years are disabled, and 25.3% 65 years and over have some type of disability. According to the 2012-2016 American Community Survey, for the disabled under 18 years old, the primary disability category were cognitive difficulties. For disabled persons aged 18-64, the primary disability categories were ambulatory, cognitive, or independent living difficulties. For those 65 and over, hearing, ambulatory and independent living difficulty were the primary disabilities.

Given the infrastructure priority for the CDBG Program, the City did not establish specific objectives for providing services, housing or other programs for special needs populations using CDBG funds. Although the City is not proposing to add any special needs housing, under the 2018-2022 Consolidated Plan, the plan is to improve pedestrian mobility in the target areas, which will benefit disabled residents, who cannot drive a vehicle.

For the purposes of the 2019 Annual Action Plan, Sandy Springs relied on Fulton County and nonprofit service providers in the North Fulton area to address service needs for these targeted populations. The

City will continue to review agency requests for certificates of consistency to support these agencies in their need to access HUD, Georgia Department of Community Affairs (DCA), and other resources to address service needs where consistent with the Consolidated Plan. The City also maintains disability-related information and links to services for the disabled on its website, along with other social service links for its residents at <http://www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/planning-and-zoning-resources/community-development-block-grant-program>

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

There are no emergency homeless shelters in Sandy Springs and the City did not dedicate CDBG funds to homeless services or activities in 2018. However, housing units and services available to the homeless in Fulton County, and the City of Atlanta are also available to homeless persons in Sandy Springs.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

See above.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

See above.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

See above.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The Housing Authority of Fulton County (HAFC) was the public housing agency for the unincorporated areas of Fulton County prior to the City's incorporation on December 1, 2005. The HAFC operates 2 housing properties within the City limits of Sandy Springs. The Belle Isle Apartments, a 9 unit project-based public housing property located at 151 W. Belle Isle Road. The HAFC states in its 2018 Annual PHA Plan that "a disposition application for HAFC Belle Isle property was approved by HUD. The closing on the property [was] projected to be December 31, 2017" (page 3). It was anticipated that the property was going to be demolished in 2018, but it has not yet occurred. The HAFC converted its public housing property, the Allen Road Mid-Rise (now called Sterling Place), located at 144 Allen Road, to the Project Based Vouchers and the Rental Assistance Demonstration (RAD) Program in 2013, rehabilitation construction was completed in February 2016.

In 2015, the HAFC was awarded 9% tax credit funding from the Georgia Department of Community Affairs, along with HUD Rental Assistance Demonstration ("RAD") funding for Allen Road Midrise. Upon closing of the financing in February 2015, the formerly public housing building converted to Project Based Voucher. This 100-unit residential property continues to be for low-income elderly and disabled residents. Renovations to the building were completed in spring of 2016.

The HAFC has also traditionally placed some Housing Choice Voucher (Section 8) residents in market-rate units in Sandy Springs. There are currently 54 families using vouchers to secure affordable housing in Sandy Springs.

In addition to traditional public housing units and programs, the HAFC participated in the development of three multifamily properties in Sandy Springs, the Commons of Victoria Park, Monterey and Hampton Hill using its multifamily housing bond program and through partnering with private developers. While not in the identified CDBG Target areas, these properties will benefit from the sidewalk improvements initiated in 2010 as these improvements will improve access to commercial areas, parks, public transit and services across the sidewalk network.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

The City did not plan to take any actions to encourage resident participation in public housing management and/or homeownership programs at the facilities managed by the Housing Authority of Fulton County (HAFC) in its 2018 Annual Action Plan.

### **Actions taken to provide assistance to troubled PHAs**

N/A

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

In Spring 2020, the City began a search for group to conduct a Housing Needs Assessment. The goal of the project is to provide a better understanding of the existing housing market and needs of current and future Sandy Springs residents. The assessment will create a framework and knowledge base to create a Strategic Housing Action Plan.

As part of the Housing Goals adopted in the Next 10 Comprehensive Plan, the city has formed a Taskforce responsible for researching potential incentive and redevelopment strategies as well as workforce housing strategies for the north-end of Sandy Springs. The Taskforce recommendations were presented to Mayor and Council in January 2019. In January 2019, the taskforce provided recommendation on potential plans for the North End of the City, which included among other recommendations “a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there.” In early 2020, the City partnered with a consulting firm to begin developing plans to aid in the visioning process for the North End. These plans will allow the City to see what is possible under the current Development Code regulations and if there are any amendments the City can make to aid in encouraging housing development. These plans have also been open to public input and the City has hosted several public engagement events regarding the North End Redevelopment.

The Next Ten Comprehensive Plan states the following priority actions for housing needs:

### *A. Preserve established single-family neighborhoods*

*H-A1.1. Implement measures to preserve established single-family neighborhoods.*

### *B. Provide more quality housing and offer a greater range of housing choices*

*H-B1.1. Adopt a workforce housing definition and policy. Analyze options and prepare a white paper, including financial feasibility.*

*H-B1.2. As part of the Sandy Springs Development Code, establish zoning to encourage both more housing and a greater range of housing choices including workforce housing.*

*H-B1.3. Adopt a workforce housing ordinance specifying the number/percentage of units to be set aside as workforce housing and the size of projects to which this requirement applies.*

*H-B1.4. Prepare update to the City’s Consolidated Plan per HUD requirements. Include housing resources program as part of update.*

*H-B3.5. Provide resources and assistance to encourage the redevelopment of older apartment complexes to include greenspace, small-lot, cottage style single family homes, and other owner*

*occupied housing where feasible.*

*C. Incorporate residential uses in mixed-use areas*

*H-C1.1. As part of the Sandy Springs Development Code, establish zoning to encourage inclusion of residential uses as part of mixed-use redevelopment in applicable character areas. (Page 220)*

Additionally, the Development Code has included density bonuses, such as height incentives, in exchange for providing workforce housing within specific zoning districts.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

In 2019, the City continued the completion of Phase 3 of the South Roswell Road Multiyear Project, specifically the area south of Interstate 285, which includes right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicapped ramps and brick pavers from I-285 down to Long Island Drive. Because the City's focus for 2018-2022 is on infrastructure improvements, it did not undertake any additional analysis related to other underserved needs relevant to the 2019 CDBG Program.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The City did not engage in any housing or other rehabilitation activities in 2018 that would trigger compliance with the Lead-based Paint rule as published at 24 CFR Part 35. It is anticipated that for the duration of the 2018-2022 Consolidated Plan, the City will not undertake any activities that would require compliance with the lead-based paint rule.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Taking into consideration factors over which the City has control and using its limited CDBG funds for its infrastructure priorities, the City did not establish an antipoverty strategy in 2018 and does not anticipate doing so for the period of the 2018-2022 Consolidated Plan.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The focus of the City's 2016 CDBG Program was to complete construction of Phase II and begin construction on Lower Roswell Road, which is necessary to upgrade the sidewalk network in the LMI target areas along Roswell Road as shown on Exhibit A and Exhibit B.

The focus of the City's 2017 CDBG Program was to continue with Phase 3 of the South Roswell Multiyear Project. In 2017, survey design, site environmental studies, and ROW acquisition work, along with pre-purchase of pedestrian lighting was completed.

In 2018, pre-construction work for the South Roswell Road Streetscape Project is ongoing. Advance utility relocations are set to begin in fall of 2019. Project construction is anticipated late 2019. No construction for the South Roswell Road Streetscape Project was completed in 2018.

As described earlier, infrastructure improvements are the City's priority; therefore, the need to develop a more extensive institutional service delivery structure was not required for this reporting period as the City used its current staff to manage the 2018 CDBG Program. It is expected that this approach will prove to be all that is required for the period of the 2018-2022 Consolidated Plan unless City Council amends the program to focus on other eligible activities.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

While the City has not adopted any specific strategies to address homelessness and the priority needs of homeless persons, the City has provided a \$100,000 grant from its general fund to the Community Assistance Center annually since 2010. These grant funds have been used by the CAC to further its programs for low and moderate-income individuals. In addition to continuing its support of the CAC, the City's objectives for enhancing coordination for the 2018 program year were as follows:

1. Coordinate with the Fulton County Office of Workforce Development to determine if programs or partnerships with service agencies could help the City achieve a reasonable antipoverty strategy.

The City has not developed any programs or partnerships at this time.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City's Analysis of Impediments to Fair Housing (AI) report was adopted on March 2, 2010. The AI was submitted to HUD's Office of Fair Housing and Equal Opportunity (OFHEO) on March 3, 2010. The AI identified the following "General Recommendations for Promoting Fair Housing":

1. Establish a fair housing information website.

This task was completed and information can be found at the following links in English and Spanish:

<http://www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/planning-and-zoning-resources/community-development-block-grant-program/fair-housing-information>

<http://www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/planning-and-zoning-resources/community-development-block-grant-program/fena-de-informacion-de-viv>

2. Highlight fair housing activities in Sandy Springs during National Fair Housing month every April.

The City recognized Fair Housing month through adoption of a resolution in 2013 and hosted a CDBG Program 40<sup>th</sup> Anniversary event with a Fair Housing component.

3. Explore partnerships with Sandy Springs Community Action Center (CAC) and Holy Spirit Catholic Church to ensure fair housing information is available for Hispanic/Latino residents.

In 2011, the City worked with the CAC to develop fair housing information for a brochure to be produced in 2012 (Exhibit C). These brochures were updated in 2018 and distributed to CAC and the City's seventy plus apartment complexes in August 2018. Also, brochures advertising the fair housing trainings were distributed to the general public through property managers of apartments complexes, fliers were posted in open spaces, and fliers were given for distribution to other housing service providers. CAC is now a required location to post all CDBG related documents for public view per the City's Citizen Participation Plan.

4. As part of annual apartment certification requirements provide information to landlords on fair housing.

See Recommendation #3 above.

5. Develop a fair housing outreach program for residents of Sandy Springs' rental properties for support if residents suspect they have experienced housing discrimination.

The City will reach out to the CAC and Cred-Ability (formerly Consumer Credit Counseling Service) to develop an annual joint event in the future.

6. Explore partnerships with Cred-Ability or other financial counseling agencies for outreach opportunities to Sandy Springs minority residents.

See Recommendation #5 above.

7. Future Comprehensive Plan updates should analyze opportunities to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs' policies.

The City adopted the Next 10 Comprehensive Plan in February 2017 and the new Development Code in August 2017. The Next Ten seeks to establish zoning to encourage workforce housing by adopting a workforce housing ordinance to incentivize the creation of new affordable workforce housing in new developments. Additionally, the 2017 Development Code provides incentives such as height bonuses for the creation of affordable units in new housing projects.

As part of the implementation of the priority actions stated in the Next 10, the City established a Taskforce in February 2018 responsible for conducting detailed research and analysis on available resources and tools to be used to incentivize and promote the redevelopment of certain areas of the city as well as evaluating potential workforce housing policies and strategies. In January 2019, the taskforce provided recommendation on potential plans for the North End of the City, which included among other recommendations "a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there." In early 2020, the City partnered with a consulting firm to begin developing plans to aid in the visioning process for the North End. These plans will allow the City to see what is possible under the current Development Code regulations and if there are any amendments the City can make to aid in encouraging housing development. These plans have also been open to public input and the City has hosted several public engagement events regarding the North End Redevelopment.

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.

The City has not taken action on this recommendation at this time.

The City provided the following in its Analysis of Impediments to Fair Choice adopted in 2015 as recommendations for promoting fair housing:

- a. 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.

This task was completed and information can be found at the following link in English and Spanish:

<http://www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/planning-and-zoning-resources/community-development-block-grant-program/fair-housing-information>

<http://www.sandyspringsga.gov/city-services/urban-development/planning-and-zoning/planning-and-zoning-resources/community-development-block-grant-program/fena-de-informacion-de-viv>

- b. 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.)

The City recognized Fair Housing month through adoption of a resolution in 2016. In Spring 2017, staff hosted three fair housing meetings as part of the Assessment of Fair Housing. These meetings were open to the public and were advertised by brochures distributed to apartment complexes and housing service providers, as well as posted in public recreational facilities. The meetings served for discussion on fair housing issues and opportunities. General information on fair housing law, how to identify discriminatory actions, and how to file a Fair Housing complaint were among the topics discussed at the meetings.

In summer 2018, two Fair Housing Education Workshops were hosted, one for the professionals of the City and the second session for residents.

- c. 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.

In 2011, the City worked with the CAC to develop fair housing information for a brochure to be produced in 2012 (Exhibit C). The brochures were distributed to CAC and the City's seventy plus

apartment complexes in August 2012 and in the summer of 2014.

In Spring 2017 brochures advertising the fair housing meetings were distributed to the general public through apartments complexes, fliers were posted in public recreational facilities, and fliers were given for distribution to other housing service providers. The city invited Housing Stakeholders such as non-profits like the CAC, churches, community leaders to these meetings to discuss potential fair housing issues. The City is in continued communication with stakeholders regarding consultation of CDBG plans.

In 2018, Fair Housing brochures were updated and distributed to apartment complexes and property managers located within the eligible area where streetscape improvements are taking place. Fair housing trainings were conducted in August 2018. These were targeted to professional housing providers and the public.

In 2019, CAC became a required location to post all CDBG related documents for public view per the City's Citizen Participation Plan.

The City maintains annual communication with the CAC, other housing providers, and religious organizations regarding CDBG initiatives. The City annually requests public comment for CDBG reports.

- d. 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.

See Recommendation #3 above.

- e. 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.

The City will reach out to the CAC and Cred-Ability (formerly Consumer Credit Counseling Service) to develop an annual joint event in the future. Additionally, in Spring 2017 as part of the development of the Assessment of Fair Housing, staff conducted three fair housing meetings for the public in three geographic locations to discuss fair housing challenges and opportunities. Stakeholders attended these meetings as well.

In 2018, updated fair housing brochures were distributed to apartment complexes located near where the streetscape improvements are taking place. Workshops on fair housing information were conducted for residents, housing providers, and property managers.

- f. 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.

No action has been taken on this recommendation at this time.

- g. Assess whether opportunities exist to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs' policies.

The Next 10 Comprehensive Plan adopted in February 2017 sets as one of its goals to “adopt a workforce housing ordinance specifying the number/percentage of units to be set aside as workforce housing and the size of projects to which this requirements applies.” The new Development Code adopted in August 2017, provides incentives such as height bonuses for new developments that provide affordable workforce housing units. There are two apartment complexes that have Land Use Restriction Agreements with the City, where the apartments complexes are required to provide a certainty percentage of rental units as workforce housing units.

As part of the implementation of the priority actions stated in the Next 10, the City established a Taskforce in February 2018 responsible for conducting detailed research and analysis on available resources to be used to incentivize and promote the redevelopment of certain areas of the city, as well as evaluating potential workforce housing policies. In January 2019, the Taskforce submitted a plan for the north-end revitalization, which included among other recommendations, “a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there.”

- h. 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.

The City has not taken action on this recommendation at this time.

- i. Provide incentives for the inclusion of affordable units within new developments.

The City has adopted its new Development Code in August 2017, which includes incentives, such as height bonuses, for the creation of workforce homeownership and rental housing in new developments. A Taskforce was formed in early 2018 to research potential redevelopment and workforce housing initiatives for the North-end of the city. The Taskforce recommendations to Council are due January 2019.

In Summer 2017, Staff began preparations for the Assessment of Fair Housing (AFH) to be submitted to HUD by October 2017. However, the deadline to submit the AFH was extended until 2024. New Fair Housing recommendations will be evaluated through the completion of the AFH.

## **CR-40 - Monitoring 91.220 and 91.230**

The year 2019 was the twelfth year of the City's participation in the CDBG Program. The City monitored its CDBG program regularly throughout the program year, and staff regularly updated the Director of Community Development, Director of Public Works, Assistant City Manager, City Manager, and the Mayor and City Council on the status of the CDBG Program.

Five (5) agenda items and corresponding CDBG documents were presented to the Mayor and City Council from July 2019 through May 2020 to complete the planning and reporting required for the CDBG Program and to ensure the program remained in compliance with HUD regulations and guidelines. In 2019, staff continued to review procedures for record-keeping, procurement, contracting and other processes in anticipation of future HUD monitoring reviews. Particular emphasis was placed on using HUD's established monitoring checklists, where they exist, to structure the City's CDBG Program records. These documents, as well as policies and procedures for managing the program are available in the City's CDBG Program Policies and Procedures manual.

Also, to ensure the benefits of the project are reported consistent with HUD's objective and outcome measures, the City reports its progress in providing access to a suitable living environment by using Census data that document the LMI persons who live in the CDBG target areas. At the conclusion of the project, up to 6,555 LMI persons living in the neighborhoods along Roswell Road will live in areas with a complete sidewalk network and have the option to walk to Kroger, Publix, CVS, MARTA, Ison Road Elementary School, Morgan Falls Park, Big Trees Forest Preserve, Fulton County's new community health center, the CAC, and other city services without having to drive. Sidewalk construction on upper Roswell Road area was completed in spring of 2016. Exhibit A and Exhibit B show the CDBG target areas that will benefit from the services previously mentioned. The multiyear sidewalk project will benefit all of the target areas on the north side of Sandy Springs and the surrounding neighborhoods.

In accordance with HUD requirements, the City submitted its MBE reports in October and May as required showing contracts and subcontracts that have been awarded to minority businesses (Exhibit D).

### **Citizen Participation Plan 91.105(d); 91.115(d)**

#### **Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City followed its Citizen Participation Plan to develop the 2019 Action Plan, including a public hearing at the initiation of the process. No comments were received at the public hearing. Consistent with the requirements of the Citizen Participation Plan, a public hearing is also required for the CAPER. The public hearing for the 2019 CAPER will be held on November 3, 2020 and public comments will be included in the Appendix to this report (Exhibit E).

<u>Media</u>	<u>Start</u>	<u>End</u>	<u>Days</u>
Mundo Hispanico Atlanta	September 29	October 14	15
Sandy Springs Neighbor	September 29	October 14	15
Sandy Springs website	September 29	October 14	15

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

There have been no changes to the City's program objectives.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**