





**To:** Honorable Mayor and City Council Members  
**From:** John McDonough, City Manager  
**By:** Blake Dettwiler, AICP, Director, Community Development Department *BD*  
**Date:** February 15, 2011  
**For:** March 1, 2011 Work Session  
**Agenda Item:** Approve 2011 draft CDBG Action Plan for 30-day comment period

***CMO (CITY MANAGER'S OFFICE) RECOMMENDATION***

Advertise draft 2011 CDBG Action Plan for 30-day public comment period.

***BACKGROUND***

The 30-day public comment period affords residents an opportunity to comment on proposed projects and activities for 2011.

***DISCUSSION***

The 2011 Action Plan public hearing was held on February 1, 2011. A final draft will be submitted to Council for approval on May 3, 2011. Staff recommends committing 2011 CDBG funds to Phase II of the CDBG sidewalk construction project, which will target the area between Northridge Road and the Chattahoochee River, and include sidewalk construction on the north side of Hightower Trail.

***ALTERNATIVES***

N/A

***FINANCIAL IMPACT***

For 2011, a 7.5 percent decrease has been recommended for HUD's CDBG budget. This would provide the City with approximately \$540,000 in CDBG funds for 2011.

***CONCURRENT REVIEW***

N/A

***ATTACHMENT(S)***

2011 Draft CDBG Action Plan  
PPT slide

# Draft 2011 CDBG Action Plan Schedule

---

- February 1, 2011 - public hearing
- March 1, 2011 - work session
  - City Council approval to advertise draft for 30-days
- March 7, 2011 – draft plan available for review
  - 2011 funds for Phase II sidewalk construction project
  - Northridge Road to Chattahoochee + Hightower Trail north side
- May 3, 2011 – regular meeting final plan adoption
- May 13, 2011 – submit plan to HUD



**DRAFT**  
**2011 Action Plan**  
**Community Development Block Grant**  
**Program**  
**Sandy Springs, GA**



**Proposed Adoption: May 3, 2011**  
**Proposed Submission: May 13, 2011**  
**U.S. Department of Housing and Urban Development**  
**Atlanta Region IV Office**  
**Five Points Plaza Building**  
**40 Marietta Street**  
**Atlanta, GA 30303**



Insert SF 424  
2011 Application for Federal Assistance

(To be completed for inclusion with final Action Plan)

## Table of Contents

Form SF-424.....	2
<b>Executive Summary</b>	
2008-12 Consolidated Plan .....	4
2011 Action Plan.....	4
Sources and Uses of Funds – 2011 CDBG .....	5
Sources and Uses of Funds – Section 108 Loan .....	5
Other funding options .....	6
<b>Past Performance Summary &amp; Maps</b>	
2008 CDBG Performance Measures .....	6
2008, 2009 and 2010 CDBG Program Status .....	7
Geographic Distribution and Residents Benefited .....	8
Map 1: CDBG Target Areas (≥40.7% LMI persons).....	9
Map 2: Survey Area for Future Sidewalk Improvements .....	10
Map 3: 2009 CDBG Survey Area.....	11
Map 4: 2008 and 2010 CDBG Project Area .....	12
<b>2010 Action Plan</b>	
2011 Annual objectives .....	13
Map 5: 2011 CDBG Project Area.....	14
Table 3C: Consolidated Plan listing of projects .....	15
Allocation priorities and geographic distribution .....	16
Affordable housing goals .....	16
Homeless and other special needs populations .....	16
Public housing and other housing developments.....	17
Anti-poverty strategy .....	17
Lead-based paint hazards.....	18
Barriers to Affordable Housing .....	18
Other actions .....	19
Program monitoring .....	19
2011 CDBG Program resources .....	20
Contingency .....	20
Urgent needs .....	20
<b>Other HUD programs and strategies</b>	
Neighborhood Strategy Area.....	21
Analysis of Impediments to Fair Housing (AI).....	21
Map 6: 2011 CDBG Sidewalk Construction and Areas of Minority Concentration.....	22
<b>2011 Action Plan Citizen Participation</b>	
Public hearing and public comments on draft Action Plan .....	23
<b>Resolution</b>	
City Council resolution (insert) to transmit Action Plan .....	24
<b>Certifications</b>	
Certifications list and executed certifications (insert signed cert pages) .....	25
<b>Public Notices</b>	
2011 Public Hearing, Public Comment notices & GA State Clearinghouse letter .....	36

## **Executive Summary**

### 2008-12 Consolidated Plan

The City of Sandy Springs' 2008-12 Consolidated Plan was submitted to HUD on July 1, 2008, revised in August and resubmitted in September. Sandy Springs received its first grant agreement in October 2008 for Community Development Block Grant (CDBG) funds. The Consolidated Plan is a 5-year strategic planning document that includes demographic, housing market analysis, homelessness and other data required by HUD for the City to participate in the CDBG Program. The City must submit an annual Action Plan for each year of the Consolidated Plan describing how CDBG funds will be used to accomplish the 5-year goals described in the Consolidated Plan. CDBG funds can be used to meet a wide variety of community development and other goals including infrastructure improvements, providing public services, creating jobs through economic development, housing rehabilitation and many other activities as long as the activities are eligible under the CDBG regulations (24 CFR Part 570) and meet a National Objective. The 2011 Action Plan specifies how 2011 CDBG funds will be used to meet the priority strategic infrastructure goals described in the 2008-12 Consolidated Plan

### 2011 Action Plan

Since its incorporation, the City has focused on managing growth, infrastructure replacement, capital improvements, transportation improvements and other strategies that support its well-established neighborhoods and quality of life. To that end, for the period of the 2011 Action Plan the City will continue its focus on infrastructure improvements that benefit low- and moderate-income residents of Sandy Springs. As a CDBG Entitlement Community, Sandy Springs is committed to maximizing the benefits of these federal resources for the purposes of neighborhood stabilization and improvement.

For the first year of the City's participation in the CDBG Program, the Mayor and City Council directed staff to use the 2008 funds to address the City's backlog of sidewalk improvements in the CDBG target areas on Roswell Road. In 2009, the Mayor and City Council approved a sidewalk improvements survey from Dalrymple Road to the Chattahoochee River along the Roswell Road corridor to focus future sidewalk construction projects in CDBG target areas that meet LMI area benefit regulations. When the survey is completed, the City will have the design, construction and bidding documents in place for a multiyear sidewalk improvements program. This program will focus on ensuring the City's sidewalk infrastructure complies with ADA requirements, meets the City's Suburban Overlay District policies and benefits the LMI residents living in the CDBG target areas. The focus of the 2011 Annual Action Plan will be to use the annual CDBG

allocation to construct the second phase of the multiyear sidewalk improvement project. Phase I construction committed 2008, 2009, 2009 CDBG-R and 2010 CDBG funds to the design of the multiyear sidewalk project and the construction of the first phase. Phase I covered the eligible target areas along Roswell Road from Dalrymple Road to Northridge Road. Phase II construction will commit the 2011 CDBG funds for the sidewalk improvements from Northridge Road to the Chattahoochee River. Mayor and Council also approved the construction of sidewalk on the north side of Hightower Trail to improve access to the Community Action Center. The Community Action Center is one of Sandy Springs most well established nonprofit service agencies serving LMI residents. Completion of each phase will significantly improve pedestrian safety along the Roswell Road corridor. These improvements will also provide the City's LMI residents living along Roswell Road with improved access to public transit, retail services, city parks, Fulton County's new regional health center and other services.

#### Sources and Uses of Funds – 2011 CDBG

HUD requires that preparation of the City's 2011 Action Plan include an estimate of anticipated CDBG funds. HUD has notified the City that its 2011 allocation will be \$(insert) for 2011. As described above, the 2011 Action Plan will commit 2011 CDBG funds to Phase II of the Roswell Road Multiyear Sidewalk Construction Project.

#### Sources and Uses of Funds – 2009 Section 108 Loan

By way of history, it is important to note that the Sandy Springs Mayor and City Council directed staff to prepare a Section 108 loan application to HUD on February 3, 2009, prior to the start of the current surveying and design contract that has provided the technical plans and specifications for Roswell Road Multiyear Sidewalk Construction Project. At the time of application, neither the costs nor the phasing requirements were known for the project, and it was assumed that the City would need the Section 108 funds in order to complete the project in a single construction phase. The City's Section 108 application was submitted to HUD on June 17, 2009, but has remained in a pending status since that time to allow the City to make a final determination as to the need for the funds. For Phase I of the sidewalk project, funds from the 2008, 2009 (CDBG and CDBG-R) and 2010 grant allocations are expected to fully complete Phase I construction. However, in order to construct Phase II, the City will require more than the 2011 CDBG allocation to complete construction. Staff will keep HUD apprised on the sidewalk project and the possibility for the need to revise and resubmit the Section 108 application.

### Other Funding Options

As an alternative to completing the Section 108 loan application, the City may elect to begin Phase II construction upon receipt of its 2012 CDBG allocation. Or, the City may explore a pre-award agreement with HUD to begin the construction prior to receipt of the 2012 CDBG allocation and then complete the construction once the 2012 funds are available. Staff has presented these potential funding scenarios to the Mayor and City Council at the February 1, 2011, regular meeting prior to the 2011 Annual Action Plan public hearing. No determination was made as to the optimal funding strategy for Phase II of the sidewalk construction project. Staff will present these options to Mayor and City Council again later in 2011 following the start of Phase I of the sidewalk construction project.

## **Past Performance Summary & Maps**

### 2008 CDBG Program Performance Measures

In developing the City's first 5-year Consolidated Plan for its CDBG Program, the City used an estimated \$147m in short-term transportation needs as a framework for establishing CDBG Program project activities. Improvements to the City's transportation system, and especially its sidewalk network, were a priority. For 2008, this priority was developed to be consistent with HUD's requirement that the City report its CDBG accomplishments within the context of specific objectives, outcome measures and performance indicators. As prescribed in the Federal Register notice published March 7, 2006, HUD's program objectives focus on three specific areas:

1. Creating a suitable living environment;
2. Providing decent housing; and
3. Promoting economic opportunities.

Along with these objectives, three outcome measures were described in the March 7, 2006, notice as well:

1. Availability/Accessibility to infrastructure, public services, public facilities, housing or shelter for LMI income persons, including persons with disabilities;
2. Affordability and maintenance of the affordability of housing and services, such as transportation or day care; and
3. Sustainability through promoting livable and viable communities by providing programs and projects that sustain communities and neighborhoods.

Consistent with these objectives and outcomes, the City's priority to improve its infrastructure was linked to HUD's performance indicator goals as follows:

For the 2008 CDBG Roswell Road Sidewalk Project, the measures were as follows:

1. Objective Category: Suitable Living Environment (SL-1)
2. Outcome Category: Accessibility for the purpose of creating a suitable living environment
3. Performance Indicator: Number of persons assisted with improved access to an infrastructure benefit

The City's strategy for its 2008 CDBG program was to target Area Benefit improvements to Census Block Groups that meet the National Objective defined at 24 CFR Part 570.208(a)(1)(i):

"An activity, the benefits of which are available to all of the residents in a particular area, where at least 51 percent of the residents are low and moderate income persons. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion."

For the 2008, 2009, 2010 and 2011 CDBG Action Plans these performance measures have remained unchanged.

#### 2008, 2009 and 2010 CDBG Program Status

In April 2009, the City issued a Request for Proposals (RFP) and secured a consultant to provide surveying and design services to develop a multiyear sidewalk infrastructure improvements program.

The 2008 CDBG funds have been used for payment of these design services. The City also received \$146,909 in CDBG-R funds in 2009 and 75 percent of those funds have also been used to pay for the surveying and design project, along with the 2008 CDBG funds. In addition, the City advertised a 2008 Action Plan substantial amendment for public comment, which was adopted on March 16, 2010, to ensure compliance with HUD's 1.5 timeliness test on May 1, 2010. No public comments were received on the amendment. The City purchased 33 streetlights for \$176,292.13 to be installed in the Roswell Road CDBG target areas using the data collected from the sidewalk survey project. These funds were drawn on April 5, 2010 from IDIS, which ensured the City met the 1.5 timeliness test. The streetlights will be installed as part of Phase I of sidewalk construction, which will begin in the spring of 2011.

The 2009 CDBG Program focused on identifying the phases for sidewalk construction using the survey data, as well as future phases to potentially use Section 108 loan funds. The 2009 CDBG funds are being held in reserve for the payment of construction costs associated with Phase I of the sidewalk construction project. As in 2010, the City will use the substantial amendment process and amend its 2009 Action Plan to meet the May 1, 2011, 1.5 timeliness test. An additional 92 street lights will be purchased for approximately \$491,783 and installed along with the 33 street lights purchased in 2010 during Phase I of the construction project. The 2010 Action Plan also designated the 2010 CDBG funds for construction of Phase I of the sidewalk construction project. Those funds are being held in reserve to pay for construction expenses.

Geographic Distribution of Resources and Residents Benefited

The 2000 Census indicates 2,743 low- and moderate-income persons are projected to have benefited from the investment of the City’s CDBG funds at Phase I project completion. The identified Census Block Groups for Phase I of the CDBG sidewalk project are as follows:

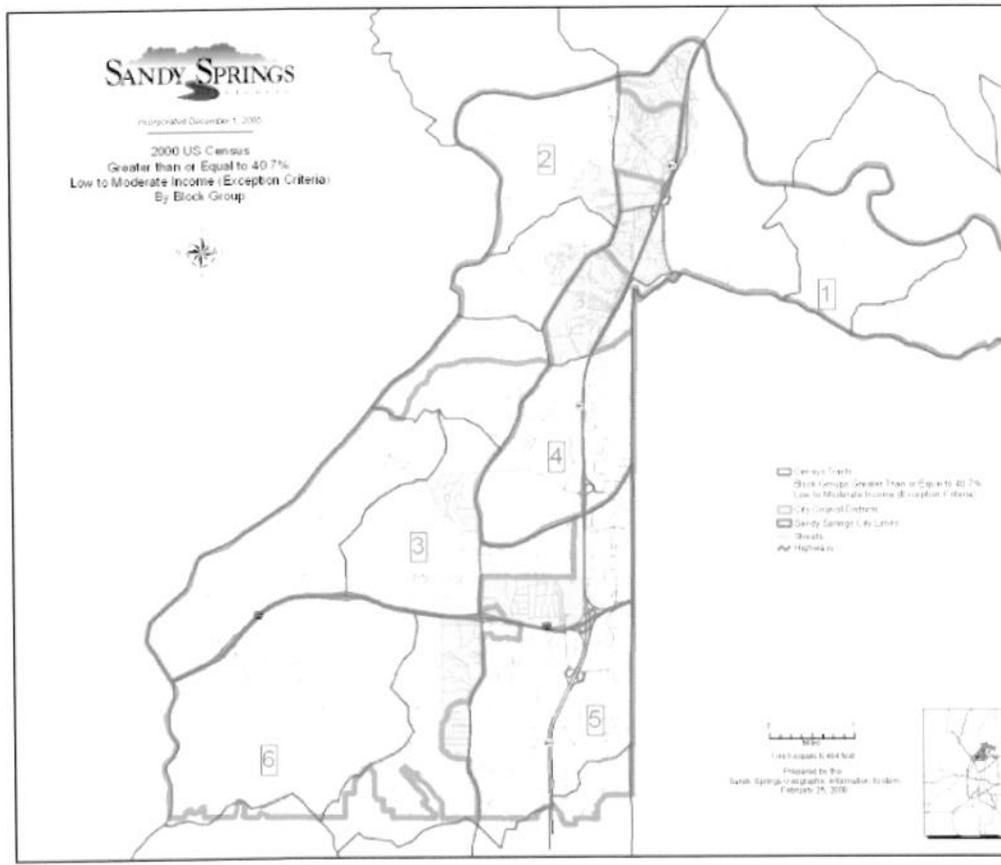
Census Tract	Block Group (BG)	LMI Population	BG Percent <sup>1</sup> LMI
1. 13121010112	1	393	40.7
2. 13121010209	5	159	40.7
3. 13121010112	3	858	41.9
4. 13121010208	6	859	47.7
5. 13121010111	2	474	40.8
Total	--	2,743	--

---

<sup>1</sup> Sandy Springs is a HUD designated Exception Entitlement Community and it’s percentage of low/mod residents required to qualify Area Benefit projects is 40.7%.

Map 1 illustrates all 11 Census Block Groups identified as CDBG Target Areas in Sandy Springs ( $\geq 40.7\%$  LMI persons):

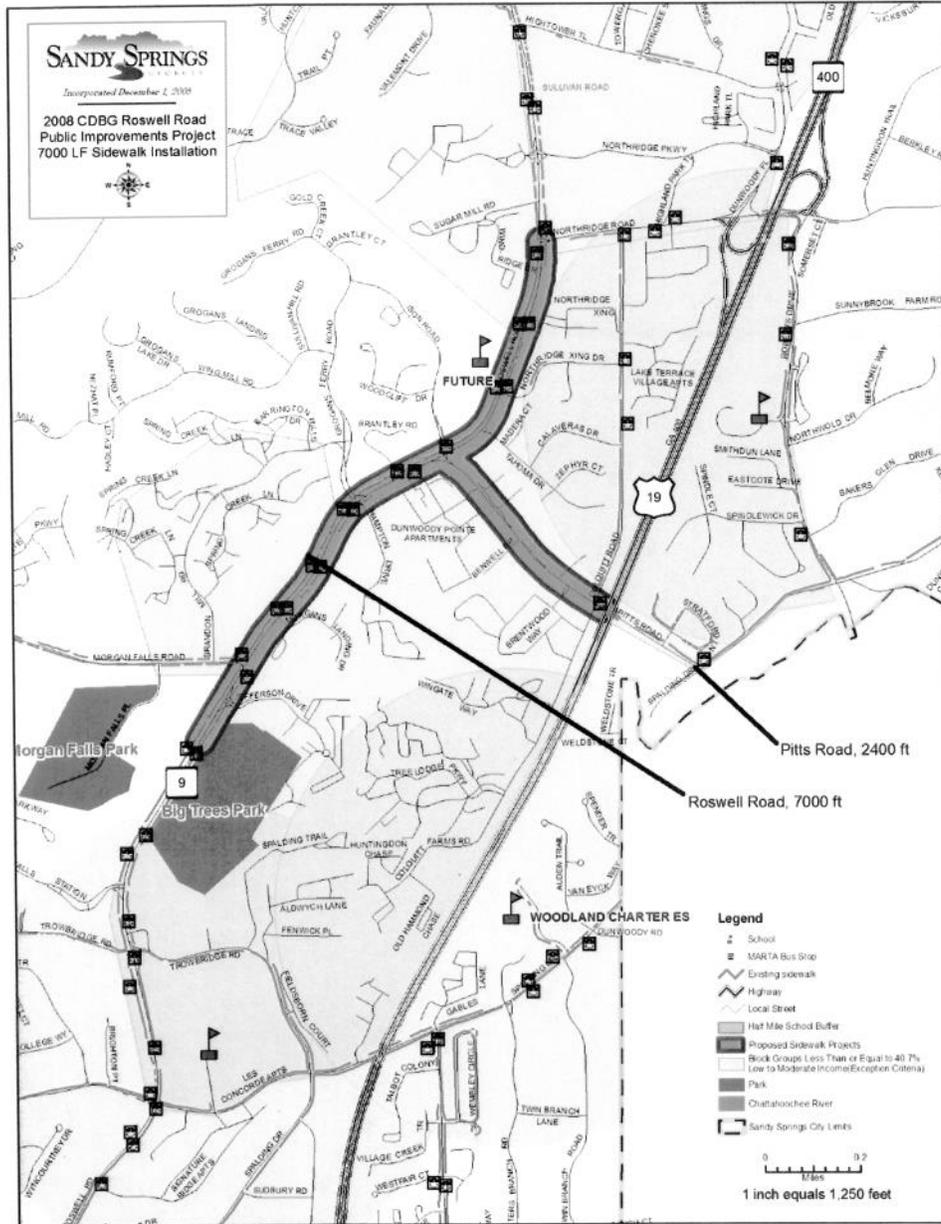
Map 1: CDBG Target Areas with a Minimum of 40.7% LMI Residents



The City of Sandy Springs is a designated Exception Community as described in the CDBG regulations 24 CFR Part 570.208(a)(1)(ii), which is a qualification criteria that applies to CDBG projects that meet the National Objective for Activities Benefitting LMI persons. The shaded areas on the map show where Census Tract Block Groups have at least 40.7% LMI persons. Exception status designation only applies to projects that qualify as an Area Benefit activity. The City's sidewalk construction project is an eligible activity under this designation.

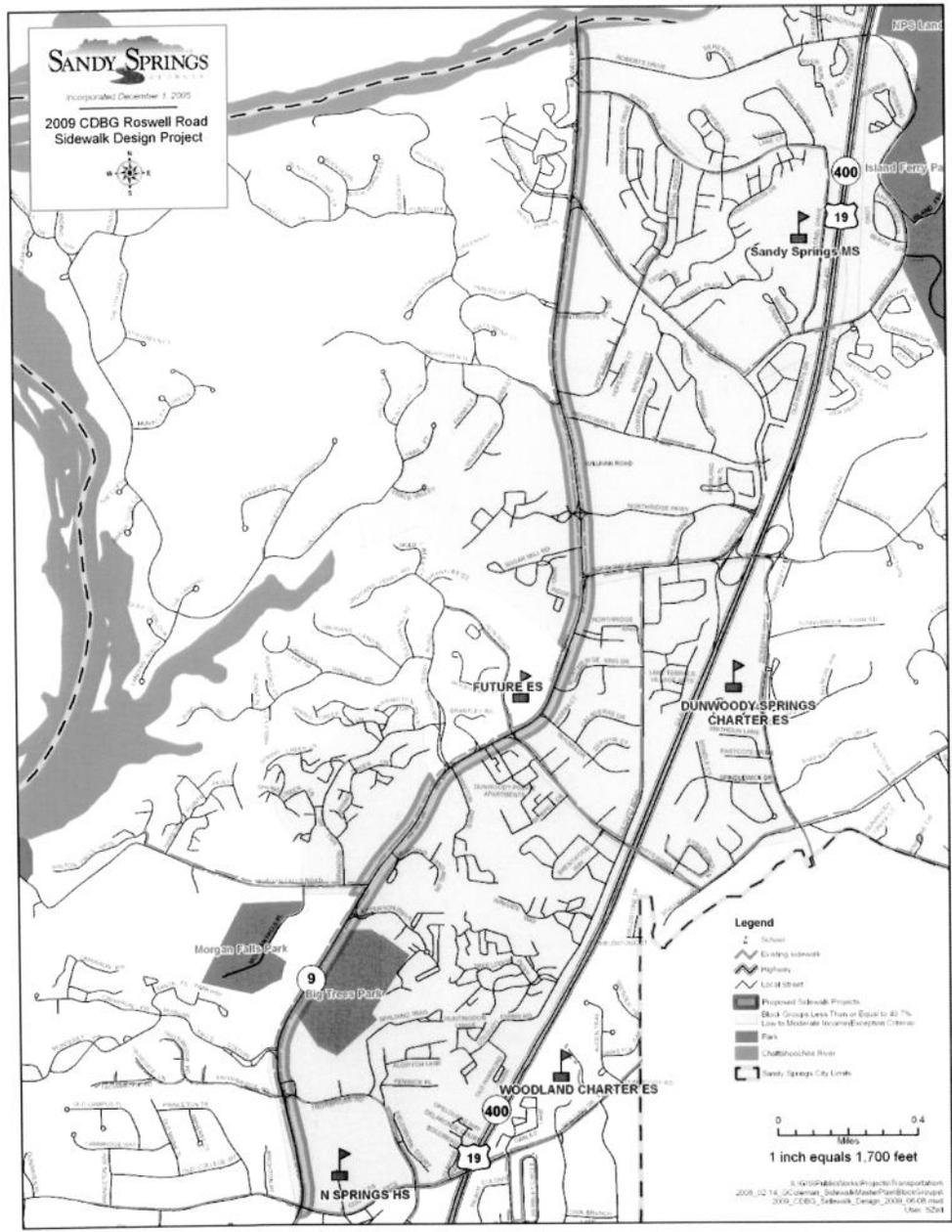
The City adopted a potential area for sidewalk improvements as part of its 2008 Action Plan process. Sidewalk survey data was used to evaluate the area shown on Map 2 as potentially an area for future construction. Phase I construction will include the area shown in blue on the map, but will extend from Dalrymple Road to Northridge Road.

Map 2: 2008 CDBG Sidewalk Project Area



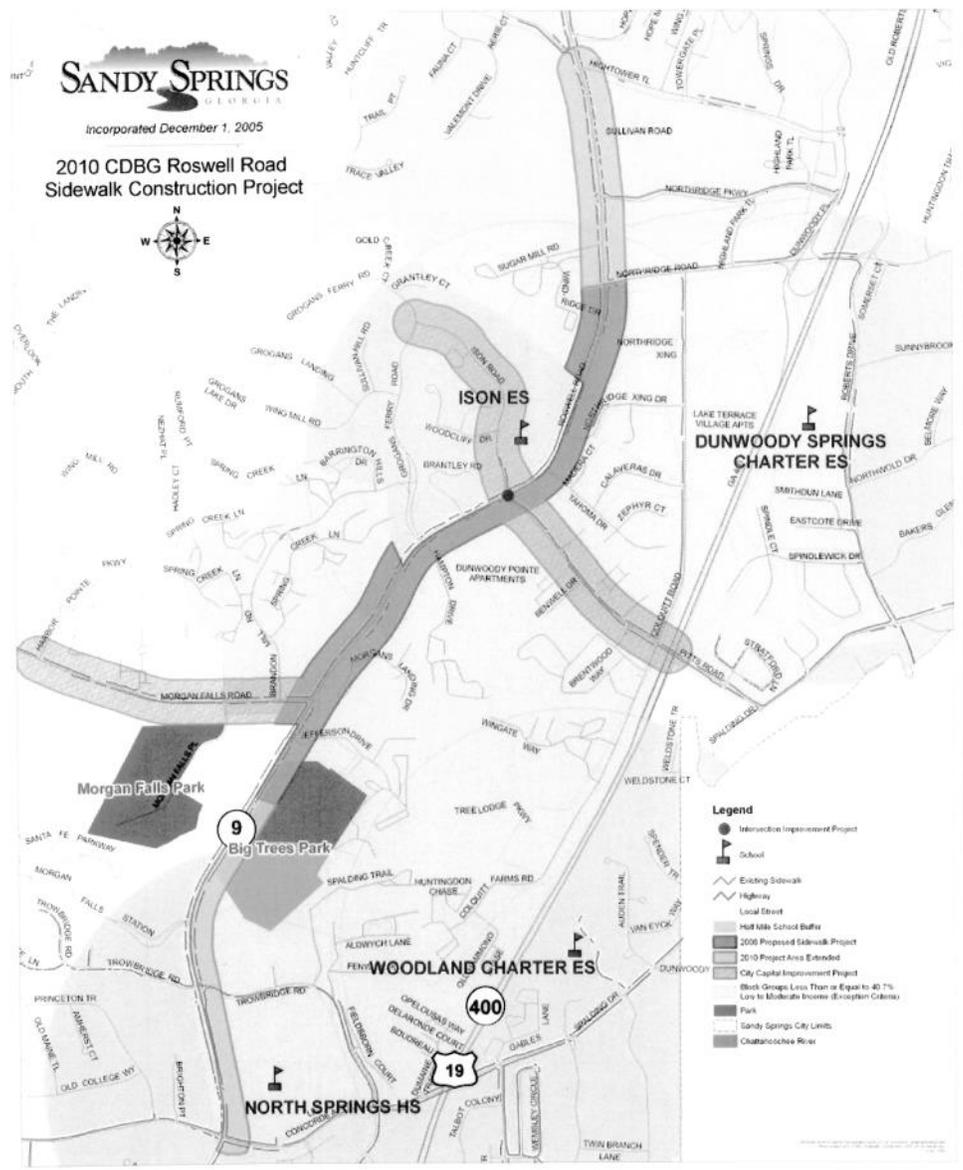
Map 3 illustrates the survey area adopted in the 2009 Action Plan from Dalrymple Road to the city limits along Roswell Road to focus future sidewalk development in LMI target areas. As of January 1, 2011, the surveying project is 95 percent completed and was paid for using 2008 CDBG and 2009 CDBG-R.

Map 3: 2009 CDBG Sidewalk Project Survey Area



Using sidewalk survey data, the area shown in Map 4 was identified as the potential location of Phase I of the sidewalk construction project using 2008, 2009 and 2010 CDBG funds. This area illustrates how the City is leveraging its CIP funds with CDBG funds to complete the sidewalk network in these critical target areas and improve the overall pedestrian safety in the area for all City residents and especially LMI residents living in the multifamily properties along Roswell Road. The focus area for construction has since been revised and will now cover the area surveyed from Dalrymple Road to Northridge Road.

**Map 4: 2008 CDBG and 2010 CDBG Sidewalk Project Area**



## 2011 Action Plan

### 2011 Annual Objectives

For the City's 2011 Action Plan, the objectives remain the same as for 2008, 2009 and 2010 Action Plans:

1. Objective Category: Suitable Living Environment (SL-1)
2. Outcome Category: Accessibility for the purpose of creating a suitable living environment
3. Performance Indicator: Number of persons assisted with improved access to an infrastructure benefit

The targeted Block Groups for the 2011 CDBG Phase II sidewalk project are listed in the table below with the corresponding beneficiaries' demographic information. The Block Groups are as follows:

Table 1: 2011 LMI Benefit

Census Tract	Block Group (BG)	LMI Population	BG Percent <sup>2</sup> LMI
1. 13121010208	6	859	47.7
2. 13121010111	2	474	40.8
3. 13121010111	3	1744	50.1
4. 13121010111	1	813	43.6
Total	--	3,890	--

Using sidewalk survey data, the area shown in Map 5 will be the location of Phase II of the sidewalk construction project that will use 2011 and 2012 CDBG funds. This area illustrates how the City is leveraging its CIP funds with CDBG funds to complete the sidewalk network in these critical target areas and improve the overall pedestrian safety in the area for all City residents and especially LMI residents living in the multifamily properties along Roswell Road. The construction focus area covers the area surveyed from Northridge Road to the city limits at the Chattahoochee River, and will include an area of sidewalk construction on the north side of Hightower Trail. The Mayor and City Council approved a nonsubstantial amendment to the 2008 Action Plan to add surveying and design work on the north side of Hightower Trail at their August 5, 2010, work session to improve pedestrian access to the Community Action Center (CAC). The CAC is a well-established nonprofit that provides a variety of supportive services to LMI persons in Sandy Springs.

<sup>2</sup> Sandy Springs is a HUD designated Exception Entitlement Community and it's percentage of low/mod residents required to qualify Area Benefit projects is 40.7%.



**U.S. Department of Housing and  
Urban Development**

**OMB Approval No. 2506-0117  
(Exp. 4/30/2011)**

**Table 3C  
Consolidated Plan Listing of Projects**

**Jurisdiction's Name** City of Sandy Springs, Georgia

**Priority Need** Infrastructure improvements

**Project Title** 2011 Roswell Road Sidewalk Infrastructure Improvements

**Description**

For 2011, the City will commit its CDBG funds to Phase II of the sidewalk construction project from Northridge Road to the Chattahoochee River, including sidewalk construction on the north side of Hightower Trail to improve access to the Community Action Center.

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity

**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area:** Tract 13121010208, BG-6; Tract 13121010111, BG-2; Tract 13121010111, BG-3; and Tract 13121010111, BG-1

**(Street Address):** N/A

**(City, State, Zip Code):** Sandy Springs, GA 30350

<b>Specific Objective Number</b> SL-1	<b>Project ID</b> 2008-12 Multi-year Sidewalk Infrastructure Program
<b>HUD Matrix Code</b> 03L	<b>CDBG Citation</b> 24 CFR Part 570.201(c)
<b>Type of Recipient</b> Local Government	<b>CDBG National Objective</b> LMA 24 CFR Part 570.208(a)(1)(ii)
<b>Start Date</b> 07/01/2011	<b>Completion Date</b> 06/30/2012
<b>Performance Indicator</b> LMI residents assisted (3,890)	<b>Annual Units</b> N/A
<b>Local ID</b> 20-3767748	<b>Units Upon Completion</b> N/A

**Funding Sources**

CDBG (2011)	\$ insert
ESG	\$
HOME	\$
HOPWA	\$
Total Formula	\$
Prior Year Funds	\$
Assisted Housing	\$
PHA	\$
Other Funding	\$
Total	\$ insert

Primary purpose of this project is to help  The Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

### Allocation Priorities and Geographic Distribution

Sandy Springs will continue its CDBG-funded improvements in the identified target areas that were established in 2006 to meet the National Objective 24 CFR Part 570.208(a)(1) for Area Benefit activities (See Map 1). The City will dedicate 100% of its 2011 CDBG funds to activities associated with the development of its multiyear sidewalk infrastructure improvements program. There are significant needs in these target areas for complete sidewalk networks to provide residents living in multifamily properties better access to public transit, commercial areas, city parks and other services. One hundred percent (100%) of 2011 CDBG funds will benefit the LMI residents living in these target areas.

### Affordable Housing Goals

The City will not use 2011 CDBG funds for affordable housing activities. However, the City recognizes its option to always amend its Consolidated Plan and Action Plan to reflect changing needs and priorities.

### Homeless and Other Special Needs Populations

The City will not use 2011 CDBG funds for homeless or special needs activities. And while there are no emergency homeless shelters in Sandy Springs, there are two well-established nonprofit social service providers who address homelessness as part of their service mission in Sandy Springs.

The Community Action 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; 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 is completing the surveying and design work needed to construct sidewalk in CDBG target areas along Roswell Road. On August 5, 2010, the Mayor and City Council revised the project to incorporate the surveying required to construct sidewalk on the north side of Hightower Trail to improve access to the CAC. This sidewalk will be constructed in Phase II of the project and will use the 2011 CDBG funds for construction.

Mary Hall Freedom House is another social service provider in Sandy Springs. This agency provides a transitional housing and homelessness prevention facility for women and women with children seeking shelter from domestic violence and in need of supportive services to eliminate substance abuse. This agency regularly receives DCA Emergency Shelter Grant (ESG) funds and the City

provides the necessary certificate of consistency required by DCA to assist the agency with its funding request when requested.

#### Public Housing and Other Housing Developments

The Housing Authority of Fulton County (HAFC) maintains two traditional public housing properties in Sandy Springs: the Allen Road Midrise and the Belle Isle apartments. The Allen Road Midrise is a 100 unit residential property for low-income elderly and disabled residents. Belle Isle apartments provides 9 units of traditional public housing for LMI families. Since 2006, the City has been the Responsible Entity (RE) for the completion of the HAFC's Environmental Review Record (ERR) for the agency's annual capital improvements to its Sandy Springs properties. The HAFC has also traditionally placed approximately 45-50 Housing Choice Voucher (Section 8) residents in affordable units in Sandy Springs.

Three affordable multifamily properties are also located in Sandy Springs that were supported by affordable housing bonds issued by the HAFC. The Commons of Victoria Park, Monterey and Hampton Hill are located near the City's target areas for sidewalk evaluation and improvements. Completion of the City's sidewalk network from Dalrymple Road to the Chattahoochee River will directly benefit the residents living in these developments.

#### Antipoverty Strategy

The City currently does not manage an antipoverty strategy. However, the City continues to collaborate with MARTA to improve access to public transit in Sandy Springs, providing better connections to the retail and service sector jobs that exist in the City, many of which could be occupied by the City's LMI residents. Fulton County government also maintains the North Fulton Career Center in Sandy Springs at 8610 Roswell Road for persons interested in GED preparation, vocational training, childcare services, transportation assistance, job readiness and job placement services. The Fulton County North Service Center at 7741 Roswell Road completed its renovation in July 2010 and reopened for services. The facility now houses a regional health center. Services provided at the North Service Center include the following:

1. Primary care
2. Public health
3. Behavioral health
4. Dental services
5. Housing and workforce development services
6. Child care for those receiving health services
7. Cooperative Extension
8. Voter Registration/Elections

9. Solicitor General
10. Probate
11. County Marshal
12. Superior Court Clerk
13. Magistrate Court
14. Tax Assessor

The City also has many churches, temples and other faith-based organizations that provide outreach, services and assistance to the City's LMI and homeless populations. Due to limited resources and staffing, the City's position is that the nonprofit sector and Fulton County are better positioned to address the reduction of poverty through their programs.

#### Lead-based Paint hazards

The City does not use its CDBG funds for the purposes of single-family or multifamily housing rehabilitation, which would be the City's primary opportunity to reduce the number of housing units with lead-based paint. The 2000 Census estimated 12,440 housing units in Sandy Springs were built between 1940 and 1979 when lead was included in paint. Should the City elect to undertake CDBG-funded housing rehabilitation activities in the future, the City would comply with HUD's lead-based paint rule.

#### Barriers to Affordable Housing

In 2009, the City's Community Development Department reviewed city policies to determine if land use, zoning or other ordinances created barriers to the production or retention of affordable housing. The review found that the City's requirements had a neutral effect on the support of affordable housing. The review was completed as a part of the City's Analysis of Impediments to Fair Housing, which was adopted on March 2, 2010 and submitted to the Office of Fair Housing and Equal Opportunity (OFHEO) on March 3, 2010. Several possible impediments were identified as a result of the study. The cost and lack of undeveloped land in particular is considered a barrier to the production of affordable housing in the city. Sandy Springs is 96 percent developed according to land development data analysis completed in February 2011. Eight recommendations were proposed to address potential barriers that may exist in Sandy Springs; however, the City's Comprehensive Plan adopted in November 2007 takes a positive stance on the promotion of providing housing for a range of income groups. Dense, walkable mixed use and mixed housing developments are a goal of the City as well.

### Other Actions

Due to the significant public facility and infrastructure needs in Sandy Springs, the recent down turn in the economy and limited staffing for expanding services, the City does not anticipate any additional resources to address underserved community needs, affordable housing, lead-based paint reduction or other actions beyond providing the City's current core services. However, when opportunities to foster and maintain affordable housing, remove barriers to affordable housing, and encourage a more developed institutional structure become available, the City will carefully evaluate those opportunities in the context of its core services and available staffing.

### Program Monitoring

The City of Sandy Springs contracts for the provision of the majority of its municipal services with a private firm, CH2M HILL. Administration of the CDBG Program is also managed by CH2M HILL on behalf of the City. The Community Development and Public Works Departments have responsibility for ensuring that day-to-day program and project management, long-term compliance and monitoring requirements of the CDBG Program are met. On January 20, 2011, the City of Sandy Springs issued an RFP for General Government Services. Proposals are due on March 4, 2011. The General Government Services RFP solicits interest from private firms who specialize in the delivery of communications, community development, public works, municipal courts and recreation and parks services. CH2M HILL has been a provider of General Government Services to the City since its incorporation in 2005 and will submit a proposal response for the General Government Services RFP by the March 4, 2011 submission date. If CH2M HILL is successful in this effort, program management and monitoring of the CDBG Program will continue under the new contract with the City. However, if CH2M HILL is unsuccessful, management of the CDBG Program will transition to the new firm responsible for providing community development services. This transition will occur on July 1, 2011.

Finally, the City does not contract with nonprofits for the delivery of programs or services using CDBG funds and does not anticipate doing so in 2011. Thus, no nonprofit monitoring policy or procedures are required.

2011 CDBG Program Resources

The following CDBG program resources are anticipated for 2010:

<u>Resource</u>	<u>Anticipated Amount</u>
1. 2011 CDBG allocation	\$insert
2. Program income expected	\$0
3. Amount expected to be generated by and deposited to revolving loan funds	\$0
4. Total amount expected from new float-funded activities included in the Action Plan	\$0
5. Amount expected to be received during current year from float-funded activity described in a prior plan	\$0
6. Program income received in a preceding program year not included in a prior statement or plan	\$0
7. Proceeds from a Section 108 loan	\$0
8. Surplus funds from any urban renewal settlement	\$0
9. Grant funds returned to the line of credit	\$0
2010 Total	\$insert

Contingency

No contingency reserve is anticipated for program cost overruns.

Urgent Needs

The City does not anticipate the need to certify an urgent need activity designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.

### **Other HUD Programs and Strategies**

The City does not participate in the HOME Investment Partnerships Program, Emergency Shelter Grant Program, or the Housing Opportunities for Persons with HIV/AIDS Program at this time. The Fulton County Consortium oversees the HOME Program and Fulton County is the lead entity. The Consortium does not make HOME-funded investments at this time in Sandy Springs. Sandy Springs would need to pursue HOME funds through the state of Georgia to participate in the HOME program. Fulton County Department of Human Services receives the ESG funds and uses it to provide shelter for homeless persons. The City of Atlanta is the HOPWA lead agency and the City of Sandy Springs does not participate in the process of developing the HOPWA regional strategy; however, recipients of HOPWA support can obtain housing and services throughout the region, which includes Sandy Springs.

#### Neighborhood Strategy Area

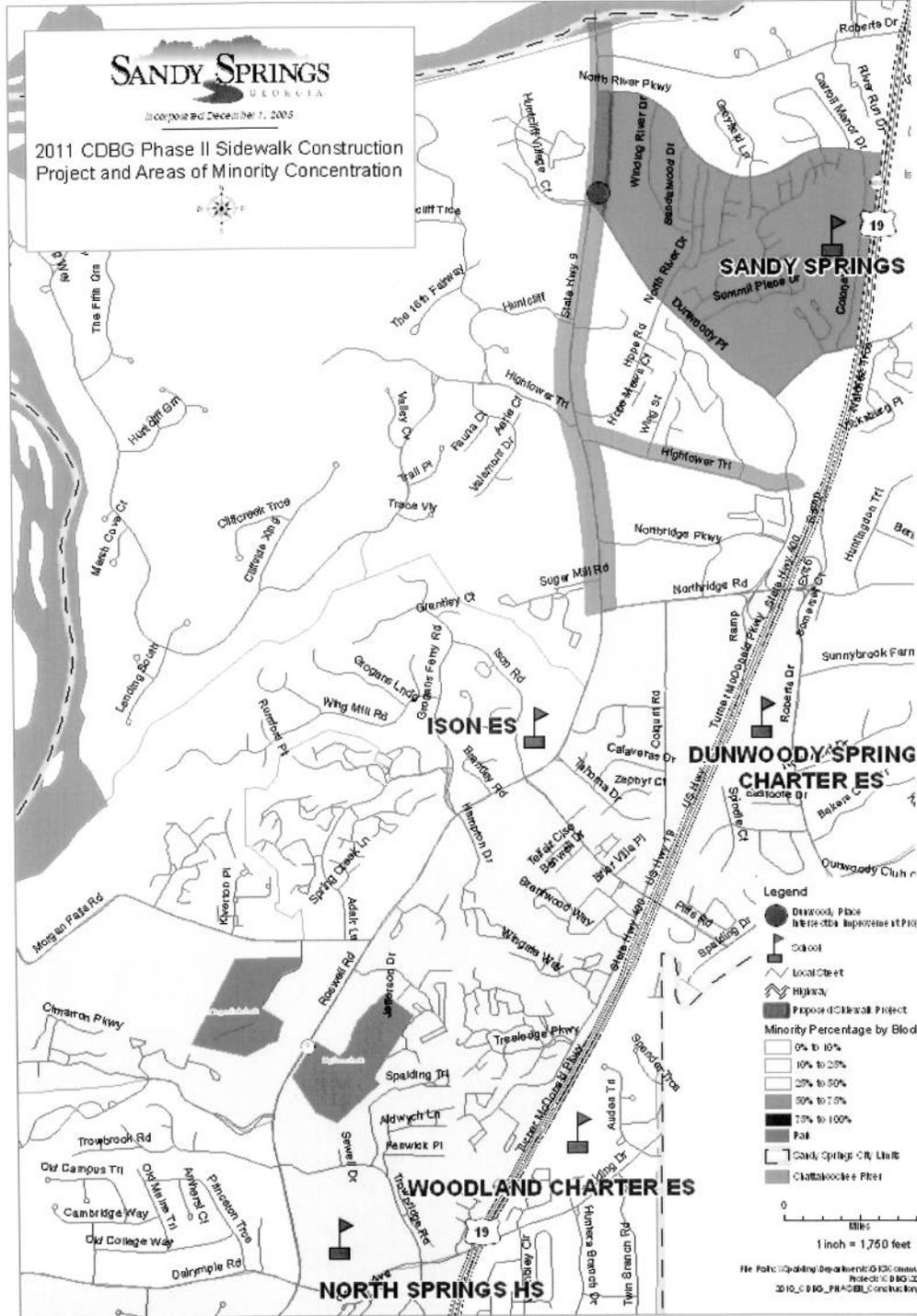
The City does not anticipate submitting an application for the designation of a Neighborhood Strategy Area (NSA) in 2011.

#### Analysis of Impediments to Fair Housing Choice (AI)

The City adopted its first AI on March 2, 2010 after several months of demographic, housing and lending data analysis. The AI was delivered to HUD's Office of Fair Housing and Equal Opportunity (FHEO) on March 3, 2010. The City did not receive any public comments on the Analysis of Impediments to Fair Housing report. For 2011, the City will continue with the implementation of the recommendations adopted in the AI, specifically focusing on fair housing outreach to nonprofit agencies in the city that serve LMI and minority populations, and the apartment owners who must comply with the City's Apartment Inspection Ordinance.

As part of the 2010 Action Plan process, FHEO requested a City map showing the planned projects for 2010 and areas of minority concentration. In anticipation that this information will be important to HUD's review of the City's proposed 2011 Action Plan, a map showing Phase II of the sidewalk construction project and areas of minority concentration has been included and shown on Map 6 below.

**Map 6: 2011 Phase II Sidewalk Construction Project Area and Areas of Minority Concentration in Sandy Springs**



## **2011 Action Plan Citizen Participation**

### **Public Hearing and Public Comments on Draft Action Plan**

As outlined in its Citizen Participation Plan for the CDBG Program and to comply with 24 CFR Part 91.105, a notice of public hearing was published in the Fulton Daily Report (publication for all City public notices) on **Tuesday, January 18, 2011.**

The public hearing was held before the Sandy Springs Mayor and City Council on **Tuesday, February 1, 2011.** The City did not receive comments from the public at the hearing prior to preparing the draft Action Plan. The draft 2011 Action Plan was approved for advertisement on **March 1, 2011,** and advertised for 30 days from **March 7, 2011 through April 8, 2011.** The following comments were received on the draft Action Plan:

(Insert any public comments received during 30-day public comment period)

**Resolution**

**Certifications**

1. Non-state governmental certifications	Page
2. Specific CDBG certifications	Page
3. Optional CDBG certifications	Page
4. Specific HOME certifications	Page
5. HOPWA certifications	Page
6. ESG certifications	Page
7. Appendix to Certifications	Page

### **Public Notices**

2009 CDBG Annual Action Plan Substantial Amendment (Attached)

- Fulton Daily Report-February 7, 2011

2011 Action Plan Public Hearing-February 1, 2011

- Fulton Daily Report - January 18, 2011

2011 Draft Action Plan Public Comment

- Sandy Springs website – March 2, 2011
- Regional Library and Benson Center – March 4, 2011
- Fulton Daily Report – March 7, 2011
- Sandy Springs Neighbor News – March 16, 2011

### **GA State Clearinghouse Clearance Letter**

Request for review letter mailed - March 2, 2011