



Analysis of Impediments to Fair Housing Choice



Proposed Council Adoption: February 17, 2015
Proposed Submittal to HUD: February 20, 2015

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SECTION I.

Executive Summary of the Analysis

Sandy Springs 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 who participate in the CDBG Program assist HUD with its mission to ensure fair and equal housing opportunities for all. All HUD-funded entitlement communities are required by law to not discriminate in housing and services on the basis of race, color, religion, sex, national origin, age, familial status or disability. CDBG entitlement communities annually certify to promote fair housing in their communities. An Analysis of Impediments to Fair Housing (AI) 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 Sandy Springs AI, developed by the staff of the Department of Community Development and is consistent with the Fair Housing Planning Guide published by HUD's Office of Fair Housing and Equal Opportunity (FHEO), contains a wide range of demographic, housing, loan origination and other data important to conducting a complete analysis. Participants in this analysis include the City of Sandy Springs, CDBG Consults, apartment complexes in Sandy Springs, The Fair Housing Division of Georgia Commission on Equal Opportunity (GCEO), and Metro Atlanta Fair Housing.

Like many jurisdictions in the Atlanta metro area, Sandy Springs experienced considerable development activity from 1980 through 2000 as described by Census data. Concurrent with this growth was a notable increase in the diversity of the city's population. For example, in 1990, Sandy Springs residents were 90 percent White; by 2000, that percentage had dropped to 78 percent, and by 2010, that percentage dropped to 65 percent. As an unincorporated area of the Atlanta metropolitan region, Sandy Springs was subject to the planning and development policies of Fulton County until the City's incorporation on December 1, 2005. Fulton County approved a significant number of apartment developments in unincorporated Sandy Springs over the past 30 years. According to the 2000 Census, Sandy Springs had 42,744 housing units: 46 percent were owner-occupied units and 54 percent were renter-occupied units. In 2013, the City had 44,444 total housing units: 45 percent were owner-occupied units and 55 percent were renter-occupied units.

An important aspect of an AI requires looking at areas of minority concentration in each CDBG entitlement community. With 24,448¹ occupied rental units, apartments offer the most accessible and affordable housing option in Sandy Springs where the median home value in 2012 was \$426,800. Mapping residential data in Sandy Springs confirmed that minority and Hispanic/Latino residents are most concentrated in rental units along transit corridors; however, disabled residents are more widely dispersed throughout the city.

¹ Census 2013, B25003: Tenure, Universe of Occupied Housing Units, (2013 ACS 1-Year Estimates)

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Analysis of development patterns is also a valuable element of an AI as it helps to assess whether residents may face restricted housing choices. In Sandy Springs, residential occupancy patterns for low- and moderate-income households can be directly linked to historical land use policies that located rental properties closest to public transit, retail opportunities and services. Consistent with these same policies, more affluent households had housing options less influenced by these factors.

To further explore residential data for the AI, Community Development staff completed an informal survey of 70 apartment developments across the City in October of 2014. Of the 70 apartment developments, 29 responded representing 9,169 rental units for the City. None of the responding developments had 2-bedroom units priced at or below the median contract rent of \$824 as published in the 2013 American Community Survey. When analyzing the income needed to afford this rent, approximately 75 percent of households in Sandy Springs in 2013 could afford these units using income distribution data from the Census. However, when considering housing affordability for detached single-family housing, to afford the \$426,800 median priced house in Sandy Springs in 2013 required a gross monthly income of almost \$15,000.²

HUD's Fair Housing Planning Guide advises that an Analysis of Impediments to Fair Housing should also look at Home Mortgage Disclosure Act (HMDA) data to understand local mortgage lending patterns and its relevance to fair housing. Unfortunately, HMDA data are generally aggregated by Metropolitan Statistical Area (MSA), which presents an obstacle to developing a complete lending picture for a specific city. Mergers and online banking also make it more difficult to determine the depth of a local financial institution's lending activities. However, in some cases data was available for the Census Tracts that correspond to Sandy Springs. The results of this analysis can be found under Section V of the AI; however, for analysis at the MSA scale 2008 HMDA data illustrate a well-publicized fact that racial and ethnic minorities have lower loan approval rates than Whites in all mortgage loan categories. Fortunately, HMDA data provide information on the causes of denial, which can help to design strategies to address these historical lending disparities.

In conclusion, the preceding information represents a few of the highlights of the Sandy Springs AI. Maps, tables and other exhibits in the document have been used to more fully illustrate the referenced data, and evaluate the possible impediments to fair housing choice that might be present in Sandy Springs, which may include the following:

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

² Assumes a 30-year, 5% fixed interest rate mortgage with ratios of 28/36, 5% Down payment, 1.825 property tax and insurance costs as percent of home value

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 two older apartment complexes, 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.

Following HUD's Fair Housing Planning Guide, an AI should propose possible strategies for advancing fair housing and improving housing choices if impediments are identified. The general recommendation include the following:

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.

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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.

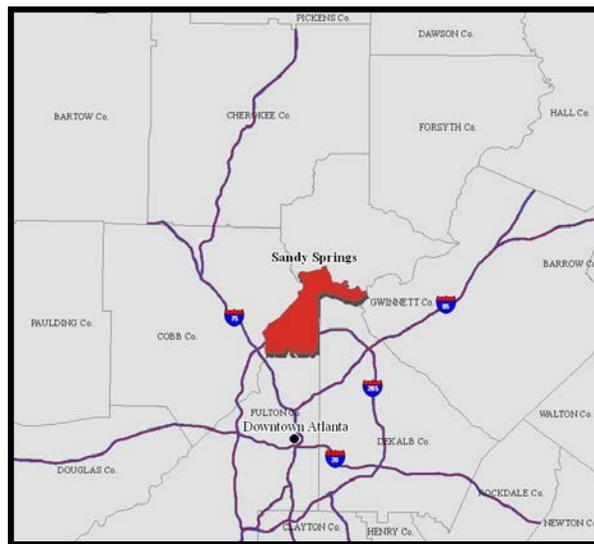
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Introduction

When the City of Sandy Springs, incorporated on December 1, 2005, it became Georgia’s sixth largest city with a 2000 Census population of 85,781 residents. This figure represents an increase of 26% over a 1990 population of 67,842. The 2008 American Community Survey estimate for the Sandy Springs population is 95,790. The City’s population as per the 2010 Census is 98,853.

Exhibit II-1: Sandy Springs Location in Atlanta Metro Region



As with all cities with populations greater than 50,000, Sandy Springs can participate in the entitlement Community Development Block Grant (CDBG) Program in partnership with the U.S. Department of Housing and Urban Development (HUD). In 2008, Sandy Springs qualified as an entitlement community in the CDBG Program, which is one of the oldest and most established federal resources still available to local governments for assisting low- and moderate-income communities, eliminating slum and blight, and meeting urgent community needs. A variety of projects and programs can be funded with CDBG, including public facility, public service, infrastructure, economic development, housing rehabilitation and other projects.

CDBG Program & Analysis of Impediments to Fair Housing (AI)

To establish measurable outcomes and objectives for the CDBG Program, HUD requires that each city develop a 5-year Consolidated Plan that establishes both long-term and short-term goals for how CDBG funds will be used. Several annual certifications are also required as a condition of participation in the program. Specific to Fair Housing laws CDBG Program participants must certify that they have completed an Analysis of Impediments and are working to ensure fair housing choices in their communities. The purpose of the Analysis of

Analysis of Impediments to Fair Housing



Impediments to Fair Housing is to identify actions, omissions and decisions within each community that may restrict a person's housing options. The AI should encompass all housing within the jurisdiction and not just the housing assisted or subsidized by the federal, state or local government.

Defining the AI

Impediments to fair housing choice are defined as actions, omissions or decisions that restrict housing choice or availability on the basis of race, color, religion, sex, disability, familial status, or national origin. Impediments may include policies, practices or procedures in the public or private sector that:

1. Constitute actual or potential violations of local, state and federal fair housing laws;
2. Are counterproductive to fair housing choice; and
3. Have the effect of restricting housing opportunities.

An AI involves:

1. A comprehensive review of a State or Entitlement jurisdiction's laws, regulations and administrative policies, procedures and practices;
2. An assessment of how those laws, etc. affect the location, availability and accessibility of housing;
3. An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; and
4. An assessment of the availability of affordable, accessible housing in a range of unit sizes.

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."³

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.

³ 42 U.S.C. Sec. 3601

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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 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.

Section II. Jurisdictional Background Data

Sandy Springs has a notable history in the Atlanta metro area in that for over thirty years, residents of this unincorporated area sought to form a city and divest themselves of governance by Fulton County. On June 21, 2005, 94 percent of the residents of Sandy Springs voted affirmatively for incorporation. On December 1, 2005, Sandy Springs became the first new municipality in Georgia in over 30 years.

General Demographics

The demographic data presented in Section II is largely taken from 2010 available through the U.S. Bureau of the Census. Where available and relevant, more recent data from the American Community Survey (ACS) has been included for comparison to the 2010 Census data. It is important to note, however, that ACS data are estimates based on sampling and not the result of analysis conducted on actual survey data from the decennial Census. In light of this, the changes evidenced through comparing 2010 Census to ACS data for Sandy Springs can be informative as it illustrates population, housing, income and other demographic shifts that may (or may not) appear following the 2020 Census. In general, Section II offers an overview of population, housing, income and other characteristics that may have relevance to identifying impediments to fair housing.

Population

The city of Sandy Springs, incorporated December 1, 2005, is Georgia's sixth largest city with a 2010 Census population of 98,853 residents. This figure represents an increase of 15% over the 2000 population of 85,781. The most recent 2013 American Community Survey estimate for the Sandy Springs population is 99,769. Exhibit III-1 reflects general population data for the city in comparison to other neighboring jurisdictions in Fulton County.

Exhibit III-1: General Population for Atlanta and North Fulton Cities⁴

Jurisdiction	Population
Atlanta	420,003
Sandy Springs	98,853
Roswell	88,346
Johns Creek	77,728
Alpharetta	57,551
Milton	32,662
Mountain Park	547

Race and Ethnicity

Sandy Springs has seen the same shifts in racial and ethnic composition as the rest of the Atlanta region over the past decade: it has become less White and more diverse. The fastest growing demographic segment over that period has been the increased residency of Hispanic/Latino persons. This population in Sandy Springs increased from 10 percent in 2000 to 14 percent in 2010, and the White population decreased from 78 percent to 65 percent. Exhibit III-2 illustrates general race and ethnicity data for Sandy Springs, the city of Atlanta and Fulton County.

⁴ All cities' populations reflect the 2010 decennial Census.

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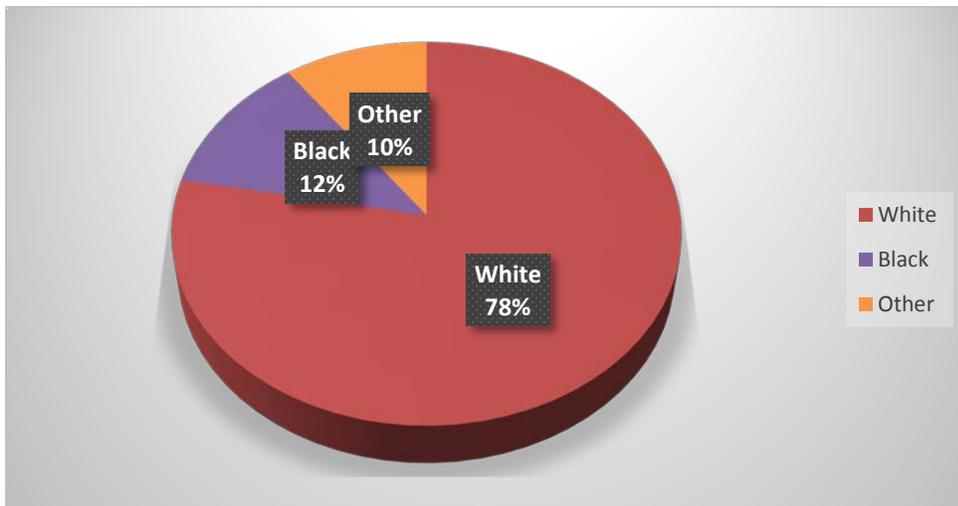


Exhibit III-2: 2010 Census Race and Ethnicity⁵

Race/Ethnicity	Sandy Springs	City of Atlanta	Fulton County
White	67.1%	39.7%	46.1%
Black/African American	21.3%	55.2%	45.3%
American Indian & Alaska Native	.8%	.8%	.8%
Asian	5.8%	3.8%	6.3%
Native Hawaiian/Other Pacific Islander	.2%	.1%	.1%
Some Other Race	7.8%	2.6%	3.9%

*Hispanic or Latino are included in each race/ethnicity

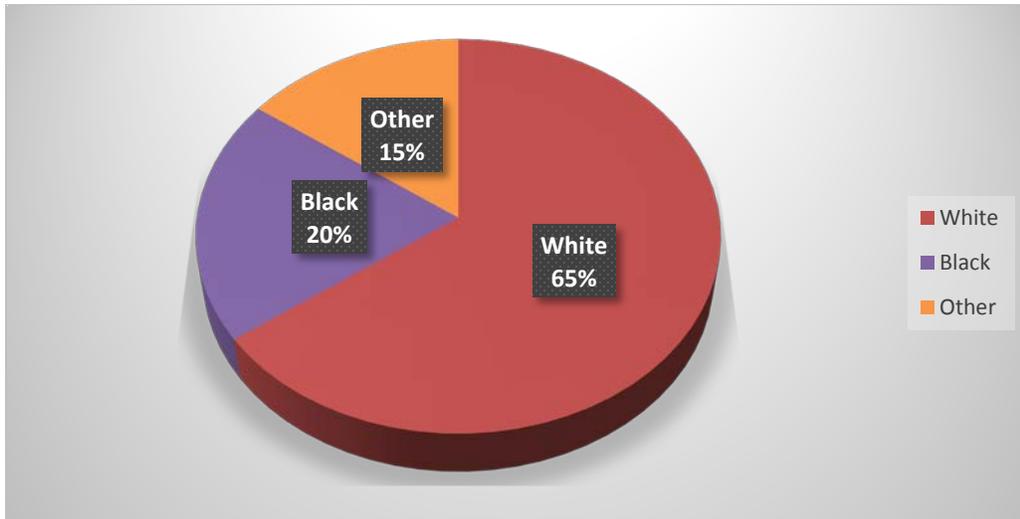
Exhibit III-3: Sandy Springs 2000 Racial Distribution⁶



⁵ Census 2010, QT-P6: Race Alone or in Combination and Hispanic or Latino: Census Summary File 1

⁶ U.S. Census Bureau, 1990 STF-1, 100-percent data file

Exhibit III-3: Sandy Springs 2010 Racial Distribution⁷



Racial and Ethnic Concentrations

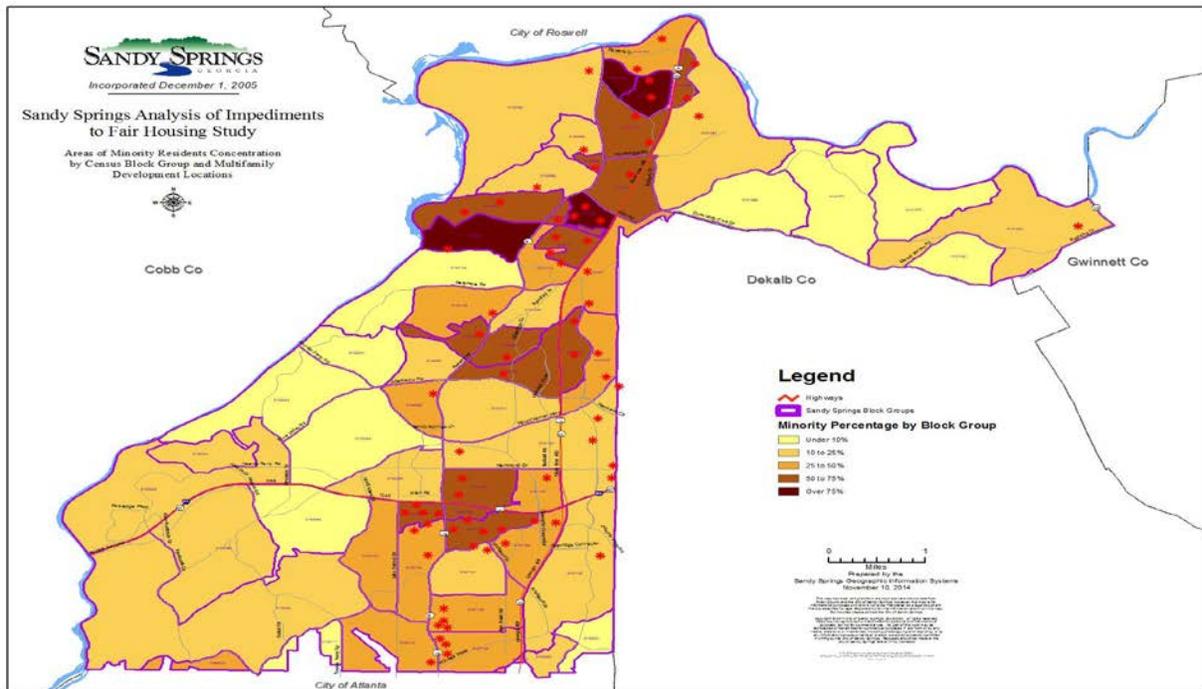
One of the key aspects of an AI is the identification of areas of minority concentration as an approach to analyzing ordinances and policies, and the resulting development patterns that may account for areas of minority concentration. However, where a person chooses to live often reflects multiple influencing factors: proximity to family and friends; access to employment, retail services or recreation; housing type, affordability, overall neighborhood perception and other factors. Exhibit III-4 illustrates areas of minority concentration in Sandy Springs using 2012 ACS, 5-Year Estimates. The map shows the Census block groups where minority residents lived, and includes the locations of apartment developments, which evidences that minority residents were most likely to live in multifamily properties in Sandy Springs rather than own a home. This is likely more a reflection of historical land use policies, income disparities between racial and ethnic groups and the availability of affordable single-family homes than evidence of minority populations being steered or discouraged from living in other areas of the city. Apartments in Sandy Springs are also the most reasonably priced housing with accessible bus and rail service linked to employments centers in north Fulton and the Atlanta metro region.

⁷ U.S. Census Bureau, 2010 STF-1, 100-percent data file

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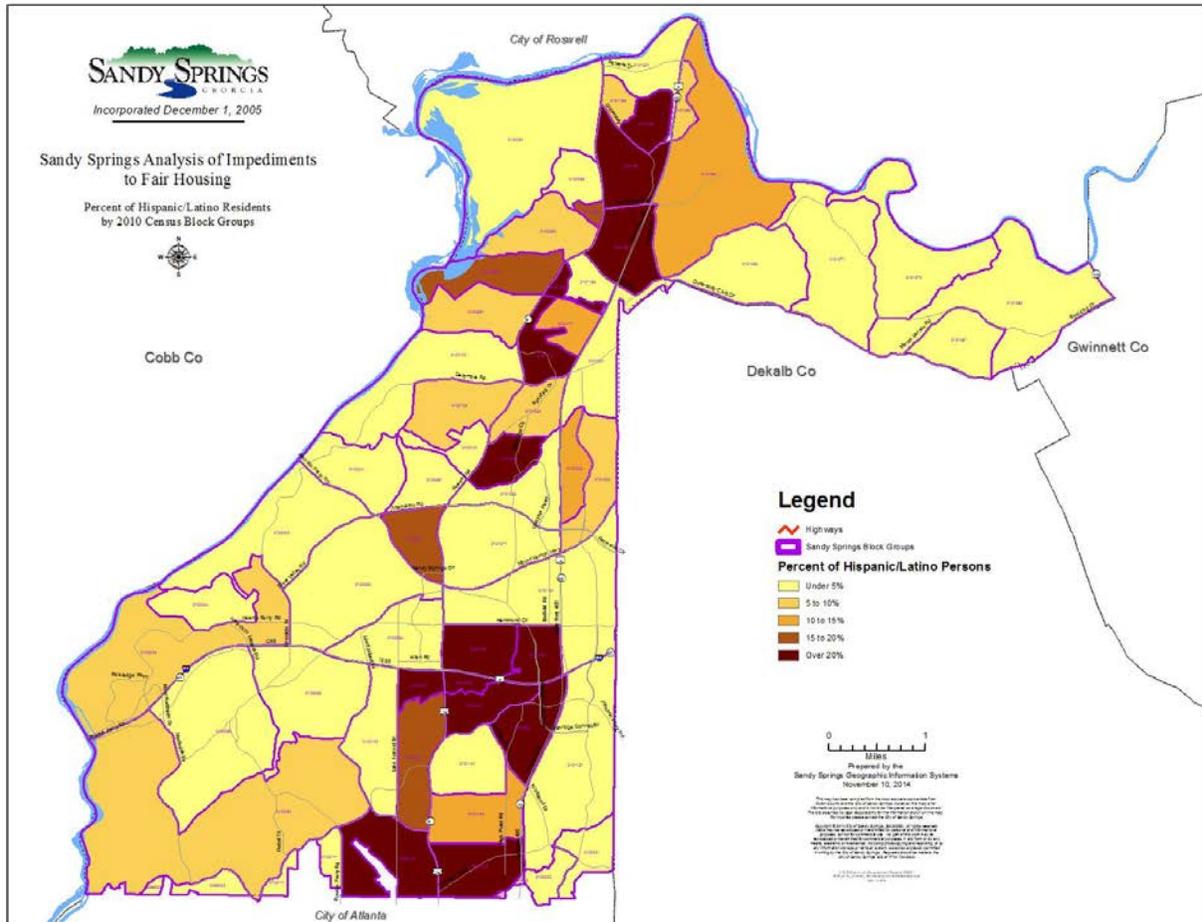
Exhibit III-4: Areas of Minority Concentration⁸ and Multifamily Development Locations



To further evaluate the distribution of minority residents in Sandy Springs, Exhibit III-5 illustrates the concentration of Hispanic/Latino residents using 2012 ACS, 5-Year Estimates block group data.

⁸ Census 2012, ACS 5-Year Estimates

Exhibit III-5: Concentration of Hispanic/Latino Residents by Block Group⁹



Gender and Age Distribution

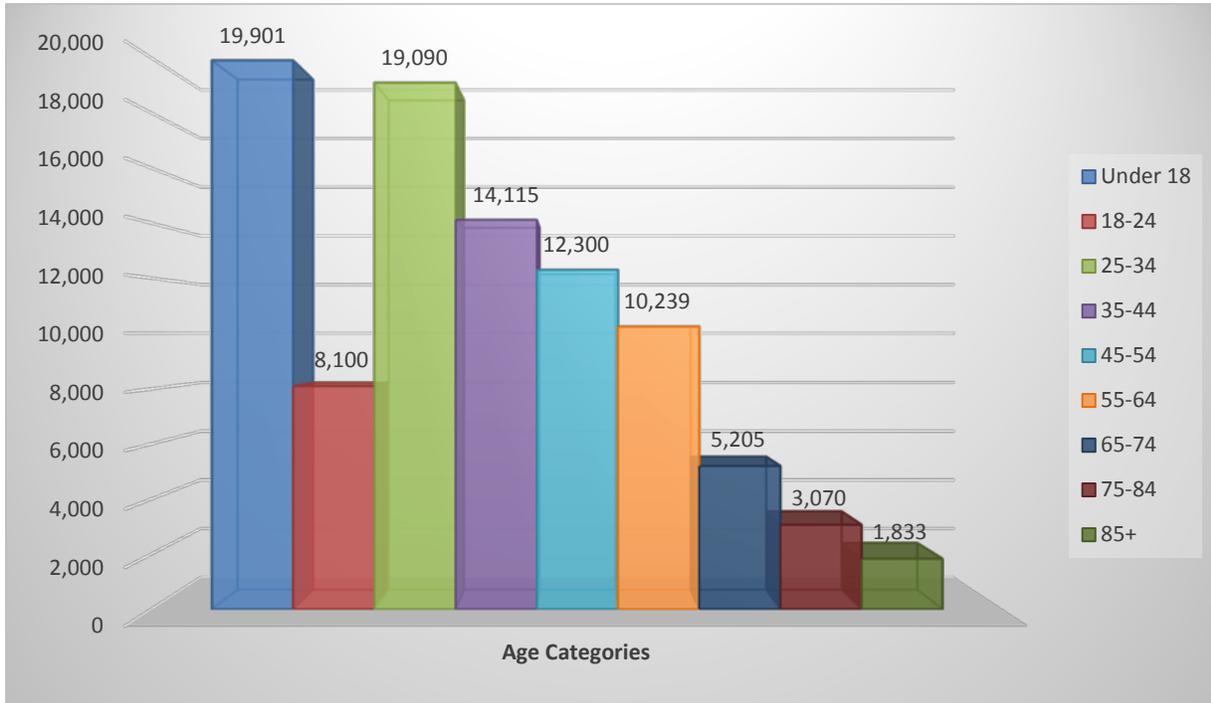
Using 2010 Census data, Sandy Springs residents were 48 percent female and 52 percent male. The largest age cohort was the under 18 residents, making up 21 percent of the city’s population, followed closely by the under 25 to 34 year old age group at 20 percent of the population. Interestingly, the American Community Survey (ACS) for 2013 estimates a significant decline in the 15 to 19 and the 20 to 24 year old categories. The ACS also estimates a significant increase in the 10 to 14 and 75 to 84 categories, which is consistent with the overall aging trends predicted nationally. Only the 2020 Census will provide evidence as to whether these predictions will hold true for Sandy Springs. Exhibit III-6 shows these estimated trends.

⁹ Census 2012, ACS 5-Year Estimates

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Exhibit III-6: 2010 Census Sandy Springs Population by Age ¹⁰



¹⁰ Census 2010, QT-P1, Age Groups and Sex: 2010

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Exhibit III-7: Sandy Springs Estimated Aging Trends¹¹

Age Cohort	Census 2010	ACS 2013 Estimates	% Change
1-4 years	6,351	6,613	4%
5-9 years	5,598	6,483	16%
10-14 years	5,025	6,200	23%
15-19 years	4,582	3,964	-14%
20-24 years	6,445	4,519	-30%
25-34 years	19,090	19,596	3%
35-44 years	14,115	15,328	9%
45-54 years	12,300	13,764	12%
55-59 years	5,350	5,885	10%
60-64 years	4,889	5,530	13%
65-74 years	5,205	5,739	10%
75-84 years	3,070	4,406	44%
85 and above	1,833	1,742	-5%

Persons with Disabilities

The 2013 ACS reported that 8,140¹² residents, or 8 percent of the city’s population, were disabled. Data on disability status comes from two questions included in the 2010 Census related to long-lasting conditions designed to capture the extent of a person’s disability. The first question asks the respondent about the presence of a long-lasting condition, such as blindness, deafness or a severe vision or hearing impairment (sensory disability) and the presence of a condition that substantially limits one or more basic physical activities, such as walking, climbing stairs, reaching lifting or carrying (physical disability). The second question

¹¹ Census 2010, QT-P1: Age Groups and Sex: 2010, 2010 Census File Summary File 1; DP05: ACS Demographic and Housing Estimates 2013 ACS 1-Year Estimates

¹² Census 2013 S1810, Disability Characteristics, 2013 ACS 1-Year Estimates

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asks if the individual had a physical, mental or emotional condition lasting 6 months or more that made it difficult to perform certain activities. Depending on the responses, the person could have a mental, self-care, going outside the home or employment disability. Exhibit III-8 shows the types of disabilities present in Sandy Springs for residents 5 years old and over.

Exhibit III-8: Disability by Type¹³

Disability	Total	Percent of Population 5+ years
One type of disability	4,008	4.0%
Sensory	3,792	3.8%
Physical	4,194	4.2%
Mental	2,778	2.8%
Self-care	1,723	2.1%
Outside home	1,417	1.6%
Employment	2,619	3.3%
Two or more disabilities	2,077	2.1%

¹³ Census 2013, B18001: Sex by Age by Number of Disabilities for the Civilian Non-Institutionalized Population 5 Years and Over, 2007 ACS 1-Year Estimates; B18020: Disability Status by Sex by Age by Employment Status for the Civilian Non-Institutionalized Population 16 to 64 Years, 2007 ACS 1-Year Estimates

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Exhibit III-9: Total Disabilities by Gender and Age

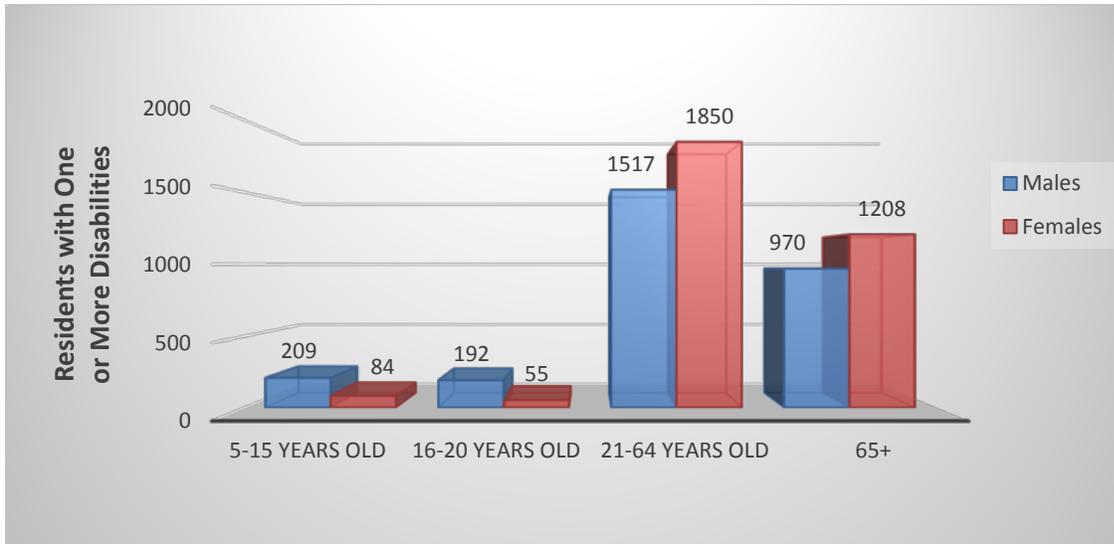
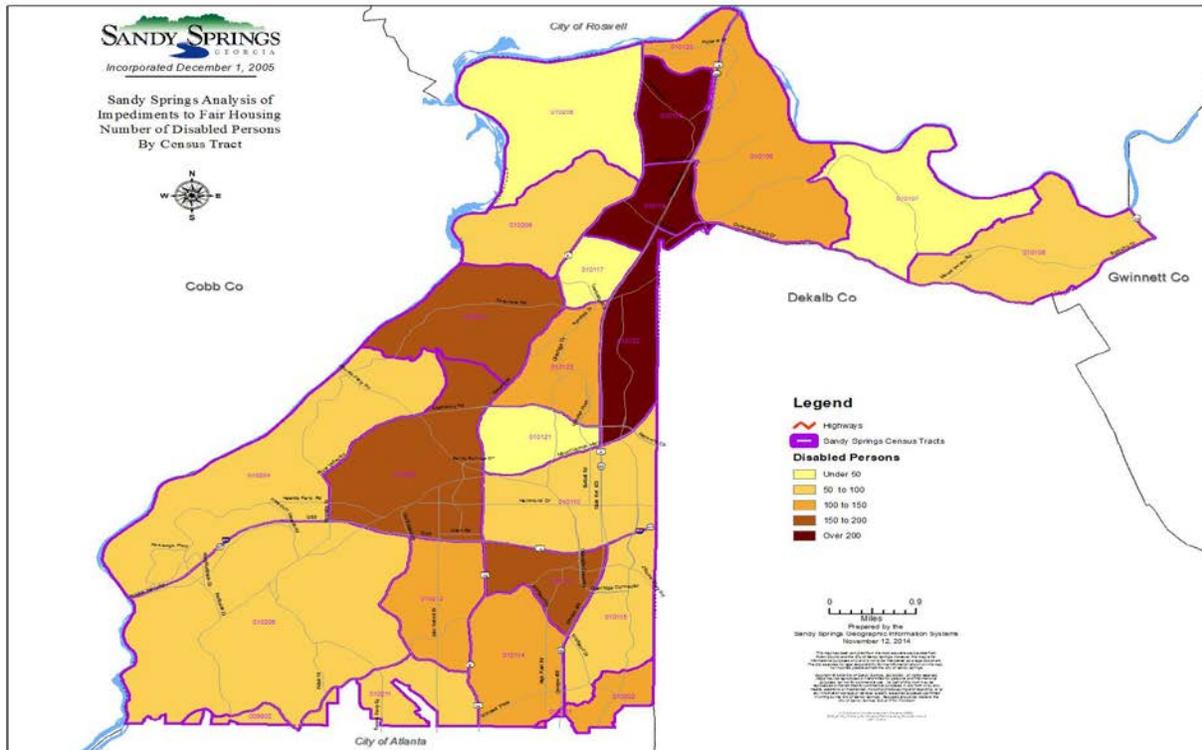


Exhibit III-10: Disabled Residents by Census Tract¹⁴



¹⁴ Census 2012, ACS 5-Year Estimates

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Employment Data

Sandy Springs is located in the north-central area of the Atlanta metro region, which provides the city with significant location advantages, including a substantial share of the region's employment growth - growth that has occurred without the adoption of aggressive economic development policies. The presence of major transportation corridors such as I-285, GA 400 and State Route 9 (Roswell Road) has provided a significant framework for development and redevelopment within those corridors as transportation and jobs have critical linkages. Sandy Springs also benefits from the presence of three MARTA rail stations that provide transportation options for those who work within Sandy Springs employment centers, as well as those who commute to these centers from other areas of the region.

Chapter 4 of the Technical Appendix of the Sandy Springs 2007-27 Comprehensive Plan notes that the resident labor force as characterized by the 2000 Census was significantly concentrated in white collar occupations including sales and office administration. These types of jobs are consistent with an economic climate and development patterns that emphasize office parks instead of industrial parks. Only a small portion of the jobs in the Sandy Springs area are in construction or production-related jobs. The Comprehensive Plan also articulates the City's desire to retain this white-collar employment focus and adopt a zoning ordinance and land use polices that support this perspective. The 2006 Comprehensive Planning process underscored this perspective as residents surveyed did not want to diversify the job mix in Sandy Springs but desired to retain the professional and office worker focus. The size and scale of the Perimeter Center Improvement District (PCID) also supports this development strategy. According to the 2013 American Community Survey (ACS) 1-Year estimates, over 74 percent of the population 16 years and over in Sandy Springs were in the labor force, and over 93 percent were employed in just 3 occupational classifications:

1. Management, professional and related occupations
2. Service occupations
3. Sales and office occupations

The specific industry sectors with the largest employment are illustrated in Exhibit III-11.

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Exhibit III-11: 2008 Sandy Springs ACS Estimates of Industry Sectors¹⁵

Industry	Number	Percent
Agriculture, forestry, fishing and hunting, and mining	404	0.7%
Construction	1,830	3.3%
Manufacturing	2,561	4.7%
Wholesale trade	1,851	3.4%
Retail trade	5,654	10.3%
Transportation, warehousing and utilities	1,139	2.1%
Information	3,081	5.6%
Finance and insurance, real estate and rental and leasing	5,568	10.1%
Professional, scientific, and management, and administrative and waste management services	10,423	18.9%
Educational services, and health care and social assistance	9,766	17.8%
Arts, entertainment, and recreation, and accommodation, and food service	8,675	15.8%
Other services, except public administration	3,232	5.9%
Public administration	819	1.5%

Transportation

The 2011-2013 ACS data indicate that over 82 percent¹⁶ of Sandy Springs residents commuted to work using a car, truck or van, and that 73 percent did so alone. Less than 9 percent used public transportation.

¹⁵ Census 2013, DP03: Selected Economic Characteristics, 2013 ACS Survey 1-Year Estimates
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Housing Profile

According to the 2013 ACS data, there were 44,444 housing units in Sandy Springs. Forty-five percent were owner-occupied units and 55 percent were renter-occupied units. Exhibit III-12 shows housing data for the 2000 and 2010 Census for Sandy Springs, Atlanta, Fulton County and Georgia.

Exhibit III-12: Housing Units by Tenure¹⁷

Jurisdiction	2000 Percent Owner- occupied	2010 Percent Owner- occupied	2000 Percent Renter- occupied	2010 Percent Renter- occupied
Sandy Springs	46%	45%	54%	55%
Atlanta	44%	43%	57%	57%
Fulton	52%	52%	50%	48%
Georgia	67%	63%	35%	37%

Since its incorporation, the question of an ideal target mix of single-family and multifamily units has been the subject of discussion by the city. The city’s position has been that the higher percentage of rental housing units provides an adequate supply of affordable housing for those who wish to live in Sandy Springs. Exhibit III-12 shows that over the past decade the percentage of owner-occupied units has declined and the number of rental units has increased in Sandy Springs while the percentage of owner-occupied units has slightly increased in other jurisdictions and the state.

In 2013, 44,263 housing units in Sandy Springs were occupied. The remaining 4,378 were vacant. Vacancy rates are shown in Exhibit III-13.

¹⁶ Census 2013, B08101, Means of Transportation to Work by Age, Workers 16 Years and Over, 2011-2013 ACS 3-Year Estimates.

¹⁷ Census 2013, CP04, Comparative Housing Characteristics, 2013 ACS Survey 1-Year Estimates

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Exhibit III-13: 2010 Census Vacancy Rates by Jurisdiction¹⁸

Jurisdiction	Percent Units Vacant
Sandy Springs	9%
Atlanta	19%
Fulton	14%
Georgia	14%

Cost of Housing

According to the 2010 Census, the median home value in Sandy Springs was \$426,800 and the median rent was \$824. Exhibit III-14 below provides monthly contract rents for rental units and median home values in Sandy Springs.

Exhibit III-14: Monthly Rents and Home Values¹⁹

Home Value	2000 Census	Monthly Rent	2000 Census
0\$ to \$99,999	12%	Less than \$200	1%
\$100,000 to \$149,999	6%	\$200 to \$299	0%
\$150,000 to \$199,999	9%	\$300 to \$499	2%
\$200,000 to \$299,999	6%	\$500 to \$749	32%
\$300,000 to \$399,999	13%	\$750 to \$999	41%
\$400,000 or more	54%	\$1000 or more	24%
Median	\$426,800	Median	\$824

¹⁸ Census 2013, CP04, Comparative Housing Characteristics, 2013 ACS Survey 1-Year Estimates

¹⁹ Census 2013, B25075: Value, Owner-Occupied Housing Units, 2013 ACS 1-Year Estimates; C25056: Contract Rent, Renter-Occupied Housing Units, 2013 ACS 1-Year Estimates;

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Exhibit III-15: Median Housing Values²⁰

Sandy Springs	City of Atlanta	Fulton County	Georgia
\$426,800	\$219,900	\$246,200	\$156,400

According to the 2013 ACS, 54 percent of the homes in Sandy Springs had a value of \$400,000 or more; 2,089 of those units had values of \$1,000,000 or more. More than half of the rental units had monthly rents greater than \$750 a month; almost 5,600 of those units had rents greater than \$1,000 a month. To afford a rental unit in Sandy Springs at the \$824 median rent, a household would need a minimum income of \$32,960.²¹ It's also important to note that an annual salary of almost \$33,000 requires a pay rate of approximately \$15.87/hour.

Staff completed an informal survey of 29 apartment developments across the city in October of 2014 representing 9,169 rental units. Sixty-two percent of those developments had 2-bedroom units priced at or below the median contract rent as published in the 2013 ACS (\$824). When analyzing the income needed to afford this rent, approximately 75 percent of households in Sandy Springs in 2013 could afford these units using income distribution data from the Census.

When considering housing affordability for detached single-family housing, to afford the median house in Sandy Springs in 2010 (\$426,800) required a gross monthly income of almost \$15,000.²² The latest American Community Survey (2012) for Sandy Springs estimates the median home value at \$426,800, or an estimated increase in value of 35 percent over the 2000 Census value of \$316,600. Seventy-two percent of the homes in Sandy Springs in 2013 had values of \$200,000 or greater.

Public Housing

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 Allen Road Midrise located at 144 Allen Road is an eleven-story development specifically for the elderly and disabled. There are 100 units available to those who meet the income and eligibility guidelines for public housing. 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 Commons at Victoria Park, Monterey and Hampton Hill, and each development has a percentage of set-aside units for those who meet

²⁰ Census 2010, State & County QuickFacts, Median Value of Owner-Occupied Housing Units, 2008-2012

²¹ Assumes HUD's calculation of not more than 30 percent of a household's income should go toward housing costs per month

²² Assumes a 30-year, 5% fixed interest rate mortgage with ratios of 28/36, 5% Downpayment, 1.825 property tax and insurance costs as percent of home value

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the income and eligibility requirements of public housing programs, along with market rate units. The HAFC also typically provides between 30-40 housing choice vouchers to eligible program participants to rent market rate apartments in Sandy Springs each year.

Age of Housing Stock

Exhibit III-17 shows housing units in Sandy Springs by the year in which they were built. Fifteen percent of Sandy Springs' owner-occupied units are over 50 years old. Fifty-nine percent of owner-occupied homes were built before 1979, the year in which lead was banned from paint. Thirty-five percent of rental units were built before 1979. That is, almost 18,000 housing units in Sandy Springs contain lead-based paint.

Exhibit III-17: Distribution of Housing Units by Year Built²³

Year Structure Built	Owner-occupied	Percent	Renter-occupied	Percent
2010 or later	196	1.0%	509	2.1%
2000 to 2009	2,423	12.1%	1,014	4.1%
1990 to 1999	2,344	11.7%	4,882	20.0%
1980 to 1989	5,255	26.3%	7,466	30.5%
1970 to 1979	3,205	16.0%	6,598	27.0%
1960 to 1969	5,177	25.9%	2,944	12.0%
1950 to 1959	1,094	5.5%	972	4.0%
1940 to 1949	126	0.6%	0	0.0%
1939 or earlier	176	0.9%	63	0.3%
Total	19,996	100.0%	24,448	100.0%
Median Year Built	1980	-	1982	-

Housing Units in Severely Substandard Condition

Data from the 2010 Census in Exhibit III-18 shows the number of Sandy Springs housing units without complete plumbing or kitchen facilities.

²³ Census 2013, B25036: Tenure by Year Structure Built, Occupied Housing Units, 2013 ACS 1-Year Estimates, B25037: Median Year Structure Built by Tenure, Occupied Housing Units, 2013 ACS 1-Year Estimates

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Exhibit III-18: Substandard Living Conditions²⁴

Substandard Facilities	Number of Units	Percent of Units
Owner-occupied units	19,996	100.0%
Lacking complete plumbing	51	0.2%
Lacking complete kitchen	143	0.7%
Renter-occupied units	24,448	100.0%
Lacking complete plumbing	0	0.0%
Lacking complete kitchen	278	1.1%

Census data reveals that only a handful of owner-occupied and rental units were substandard in Sandy Springs in 2010.

Households

In 2000, Sandy Springs had 39,288 households. The 2010 Census showed that number had increased by 3,046 to 42,334, or approximately 7% in a decade. The American Community Survey (ACS) for 2013 shows the household population increasing by 2110. Household data is shown in Exhibit III-19 below.

²⁴ Census 2013, B25053: Tenure by Kitchen Facilities, Occupied Housing Units, 2013 ACS 1-Year Estimates; B25049: Tenure Plumbing Facilities, Occupied Housing Units, 2013 ACS 1-Year Estimates

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Exhibit III-19: Sandy Springs Households²⁵

Jurisdiction	2000 Census	2010 Census	2013 ACS Estimate
Sandy Springs	39,288	42,334	44,444
City of Atlanta	168,147	185,142	185,160
Fulton County	321,242	376,377	379,281

Familial Status

The Fair Housing Act protects families from discrimination in housing choice; therefore, an AI should examine familial status and large households in the context of a broader fair housing analysis. In 2010, only 22 percent of households in Sandy Springs had children 18 years old or under in the home. Of the households with children, 68 percent were married-couple families, 9 percent were male-headed households and 24 percent were female-headed households as illustrated by Exhibit III-20.

²⁵ Census 2013, B11005: Households by Presence of People Under 18 Years by Household Type, 2013 ACS 1-Year Estimates

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Exhibit III-20: Households by Type²⁶

Household Type	Number	Percent
<i>Households with children 18 and under</i>	9,982	22%
Married-couple family	6,785	68%
Male-headed households	781	9%
Female-headed households	2,416	24%
<i>Households without children 18 and under</i>	34,462	78%
Married couple family	10,560	31%
Male-headed household	795	2%
Female-headed household	1,276	4%
<i>Total households</i>	44,444	100%

In Sandy Springs, the average household size was 2.17 persons, which was a smaller household size than Atlanta, Fulton County and Georgia. According to the 2000 Census, the average household size for renter households was also smaller than owner-occupied households in Sandy Springs.

²⁶ Census 2013, B11005: Households by Presence of People Under 18 Years by Household Type, 2013 ACS 1-Year Estimates

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Exhibit III-21: Average Household Size by Tenure²⁷

Jurisdiction	Owners	Renters	All Households
Sandy Springs	2.38	2.12	2.25
City of Atlanta	2.44	2.09	2.27
Fulton County	2.67	2.33	2.50
Georgia	2.78	2.69	2.74

Large households are defined by the Census as having five or more persons in a household. According to the 2010 Census, there were 2,001 occupied households (owner-occupied and renter) in Sandy Springs with 5 or more persons, or 4 percent of the total households in the city. Exhibit III-22 shows owner-occupied and rental households with 5 or greater residents.

Exhibit III-22: Households with Five or More Occupants by Tenure²⁸

Jurisdiction	Owned Units with 5+ Occupants	Percent of Households	Rental Units with 5+ Occupants	Percent of Households
Sandy Springs	921	2%	1,080	2%
City of Atlanta	4,356	2%	4,305	4%
Fulton County	14,325	4%	10,884	6%
Georgia	218,296	6%	136,756	10%

²⁷ Census 2013, CP04, Comparative Housing Characteristics, 2013 ACS Survey 1-Year Estimates

²⁸ Census 2010, B25009: Tenure by Household Size

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Income Data

Household Income

The 2000 Census reported the median household income for Sandy Springs at \$60,428, increasing to \$69,492 in 2006, or 6 percent over a six-year period. Median household incomes for Sandy Springs and surrounding jurisdictions are shown in Exhibit III-23.

Exhibit III-23: Household Median Incomes²⁹

Jurisdiction	2000 Median Income	2010 Median Income	Percent Change
Sandy Springs	\$60,428	\$59,110	-2%
City of Atlanta	\$34,770	\$41,631	20%
Fulton County	\$47,321	\$52,831	12%
Georgia	\$42,433	\$46,430	9%

The U.S. Department of Housing and Urban Development also provides median household incomes for selected Metropolitan Statistical Areas (MSAs) that are used to qualify participants for community development, housing and other programs. Sandy Springs is part of the Atlanta-Sandy Springs-Marietta MSA, which shows a median income for the MSA as \$67,819 in 2011. The median household income within this MSA is \$61,884.

²⁹ Census 2000, QT-P32: Income Distribution in 1999 of Households and Families, 2010; DP03: Selected Economic Characteristics, 2010 ACS 1-Year Estimates

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Exhibit III-24: Income Distribution for All Households³⁰

Income Range	Households	Percent
Less than \$10,000	3,107	6.8%
\$10,000 to \$14,999	2,680	6.0%
\$15,000 to \$19,999	964	2.2%
\$20,000 to \$24,999	2,718	6.1%
\$25,000 to \$29,999	1,771	4.0%
\$30,000 to \$34,999	1,741	3.9%
\$35,000 to \$39,999	3,188	7.2%
\$40,000 to \$44,999	1,229	2.8%
\$45,000 to \$49,999	2,142	4.8%
\$50,000 to \$59,999	2,902	6.5%
\$60,000 to \$74,999	3,633	8.2%
\$75,000 to \$99,999	3,729	8.4%
\$100,000 to \$124,999	3,408	7.7%
\$125,999 to \$149,999	2,066	4.6%
\$150,000 to \$199,999	2,857	6.4%
\$200,000 or more	6,399	14.4%
Total	44,444	100.0%

³⁰ Census 2013, B19001: Household Income in the Past 12 Months (in 2013 Inflation-Adjusted Dollars), 2013 ACS 1-Year Estimates

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As shown in Exhibit III-24, 19 percent of Sandy Springs households made less than \$25,000 a year, 42 percent made less than \$50,000 and 33 percent made more than \$100,000 in 2013.

Households in Poverty

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, the poverty rate has been adjusted to \$22,050 for the same family size. In 2000, 7 percent of Sandy Springs population, or 5,525 residents, lived below the poverty threshold. Exhibit III-25 provides the data on poverty by age group.

Exhibit III-25: Poverty by Age³¹

Age	In Poverty	Not in Poverty	Total	% in Poverty in Age Group
Under 5 years	2,122	4,491	6,613	32%
5 years	301	942	1,243	24%
6 to 11 years	3,110	4,422	7,532	41%
12 to 17 years	812	5,776	6,588	12%
18 to 64 years	7,452	58,412	65,864	11%
65 to 74 years	109	5,588	5,697	2%
75 years and over	685	5,336	6,021	11%

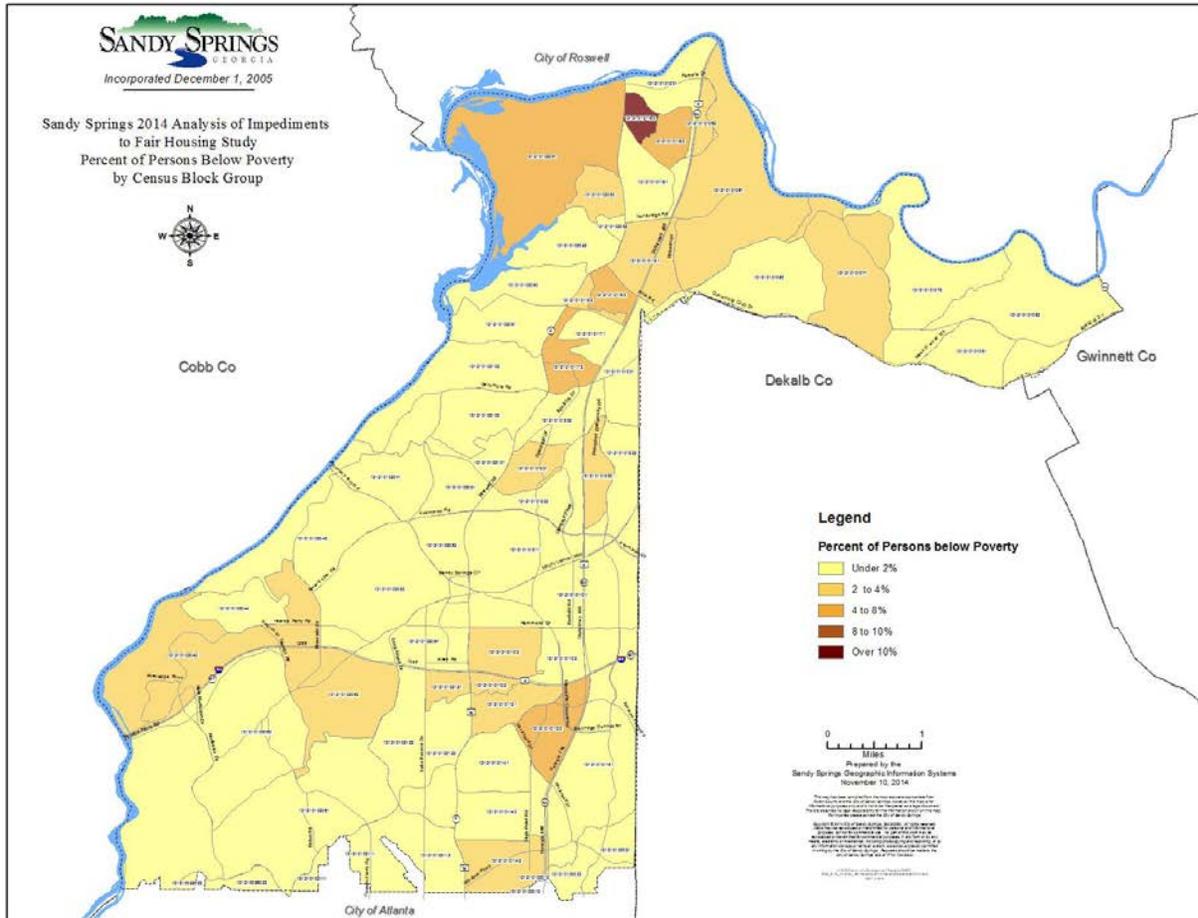
Exhibit III-26 maps this data showing the distribution of individuals living below the poverty threshold in Sandy Springs in 2012.

³¹ Census 2010: B17001: Poverty Status in the Past 12 Months by Sex by Age, 2013 ACS 1-Year Estimates

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Exhibit III-26: Persons below Poverty Threshold by Census Block Group³²

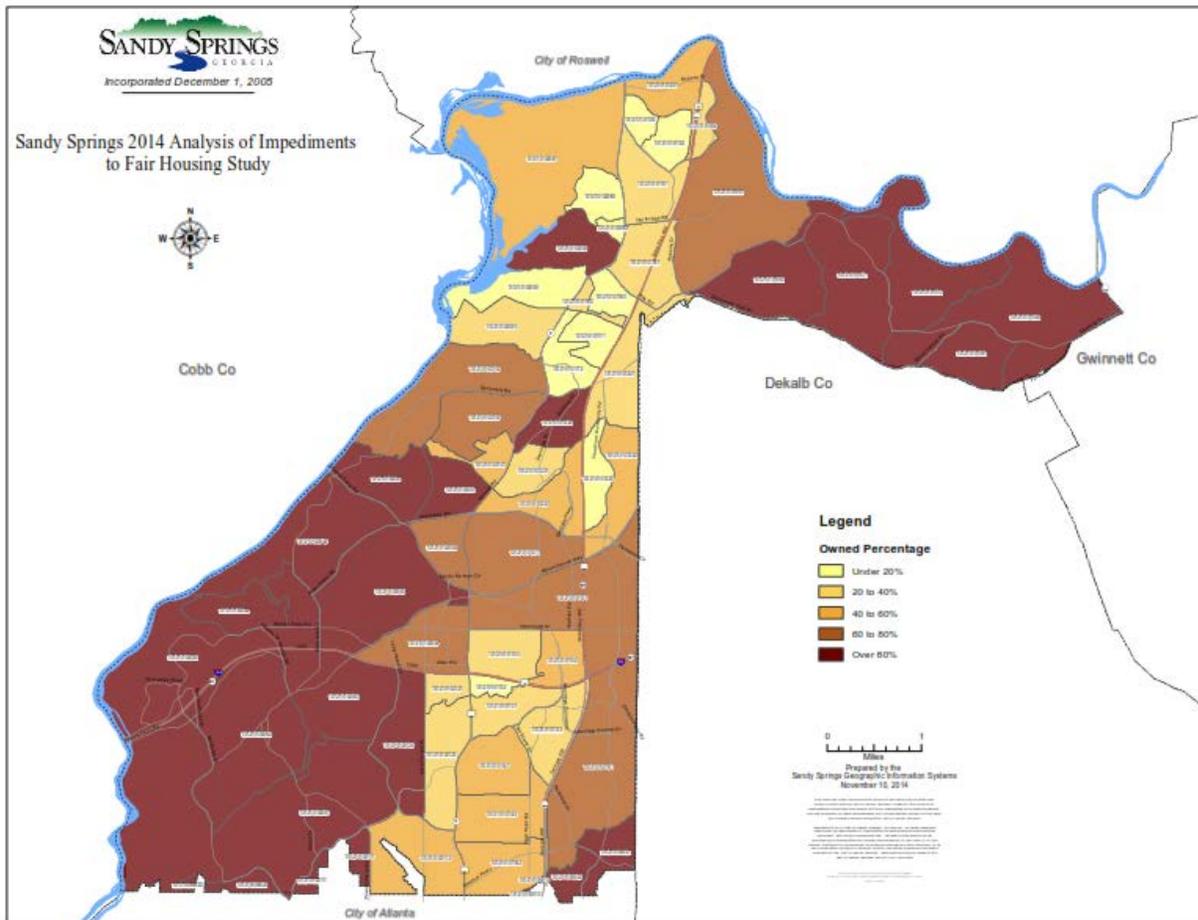


³² Census 2012, ACS 5-Year Estimates

Maps and Other Relevant Data

To further evaluate the distribution of the housing profile in Sandy Springs, Exhibit III-27 illustrates the percentage of homeowners using 2012 ACS, 5-Year Estimates block group data.

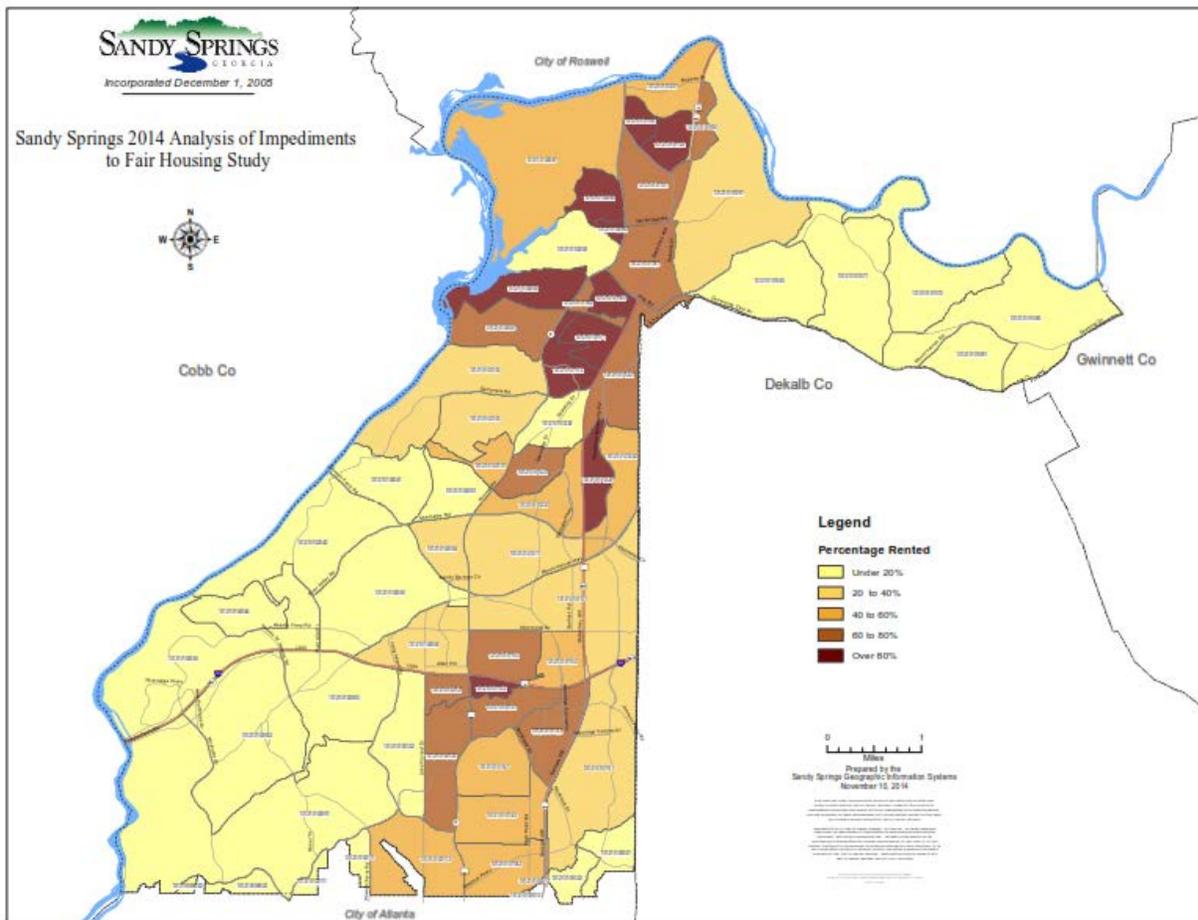
Exhibit III-27: Percentage of Homeowners by Census Block Group³³



Continuing the evaluating of the distribution of the housing profile in Sandy Springs, Exhibit III-28 illustrates the percentage of the renting population using 2012 ACS, 5-Year Estimates block group data.

³³ Census 2012, ACS 5-Year Estimates

Exhibit III-28: Percentage of Renters by Census Block Group³⁴



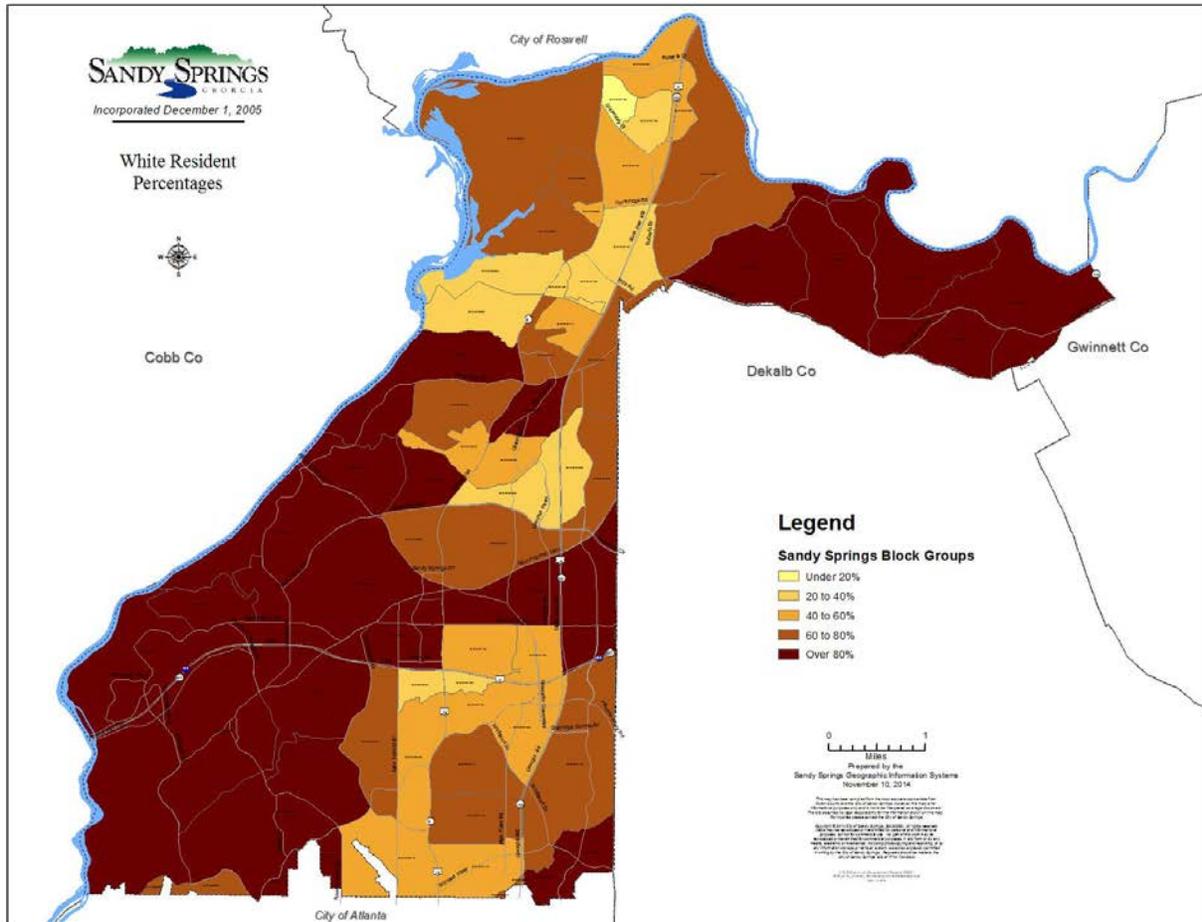
Further evaluating the racial distribution of residents in Sandy Springs, Exhibit III-29 illustrates the concentration of White residents using 2012 ACS, 5-Year Estimates block group data.

³⁴ Census 2012, ACS 5-Year Estimates

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Exhibit III-29: Percentage of White Residents in Sandy Spring by Block Group³⁵



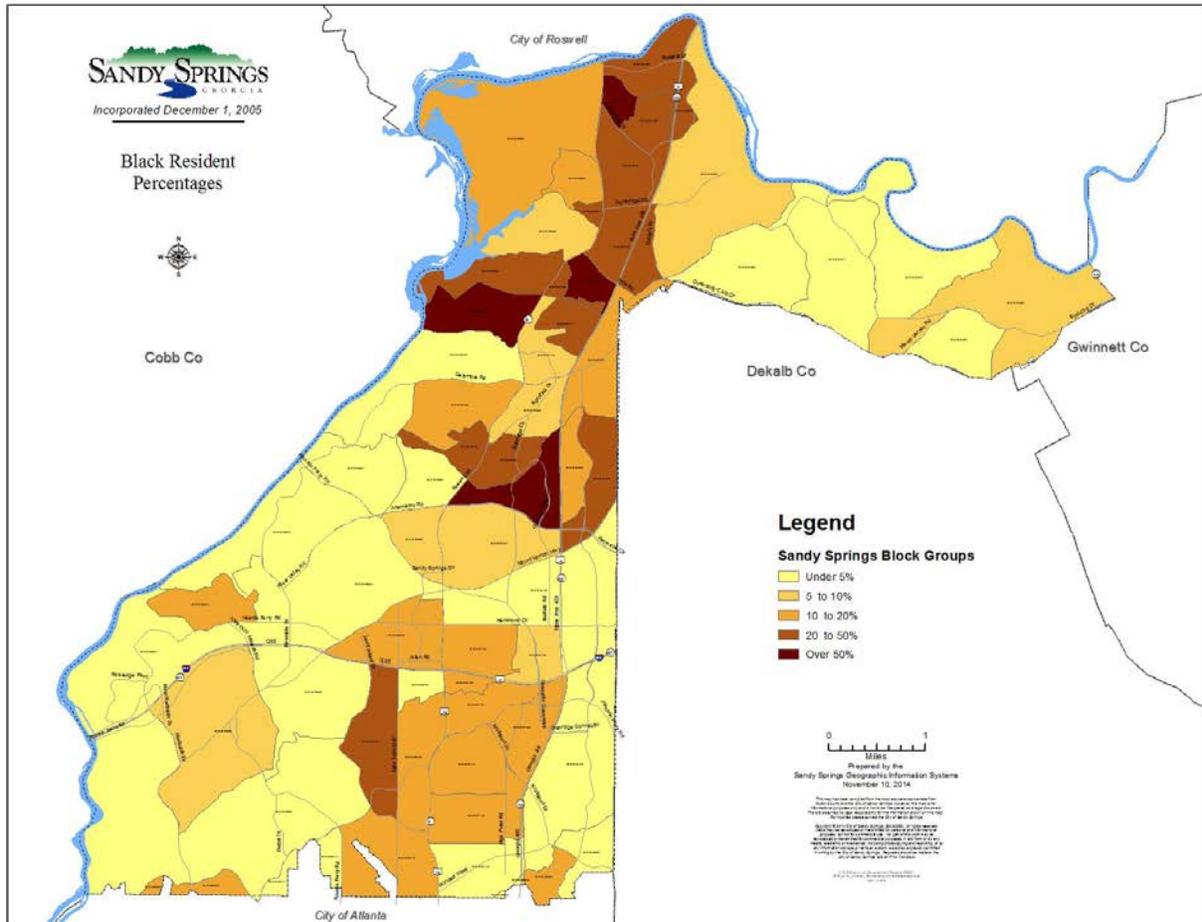
To further evaluate the racial distribution of residents in Sandy Springs, Exhibit III-30 illustrates the concentration of Black residents using 2012 ACS, 5-Year Estimates block group data.

³⁵ Census 2012, ACS 5-Year Estimates

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Exhibit III-31: Percentage of Black Residents in Sandy Spring by Block Group³⁶



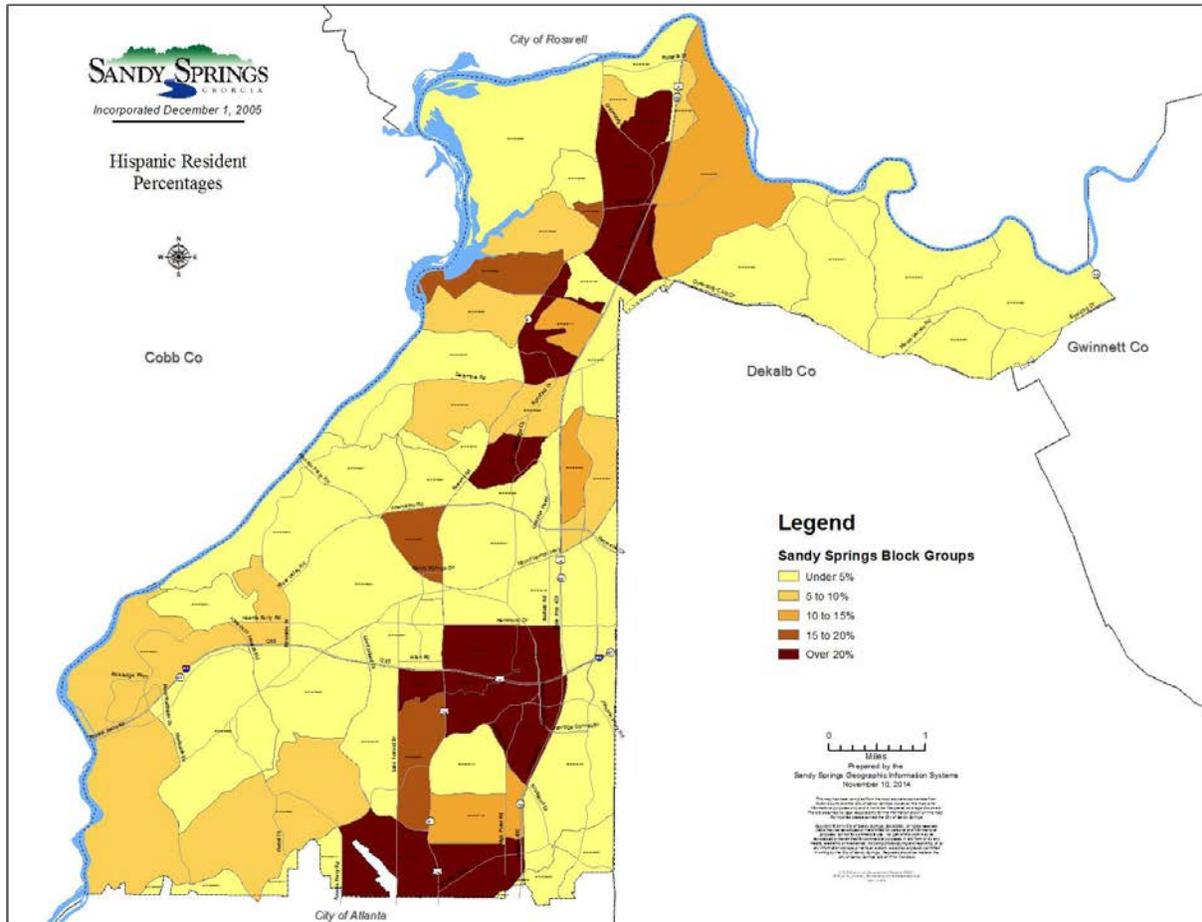
To further evaluate the racial distribution of residents in Sandy Springs, Exhibit III-32 illustrates the concentration of Hispanic residents using 2012 ACS, 5-Year Estimates block group data.

³⁶ Census 2012, ACS 5-Year Estimates

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Exhibit III-32: Percentage of Hispanic Residents in Sandy Spring by Block Group³⁷



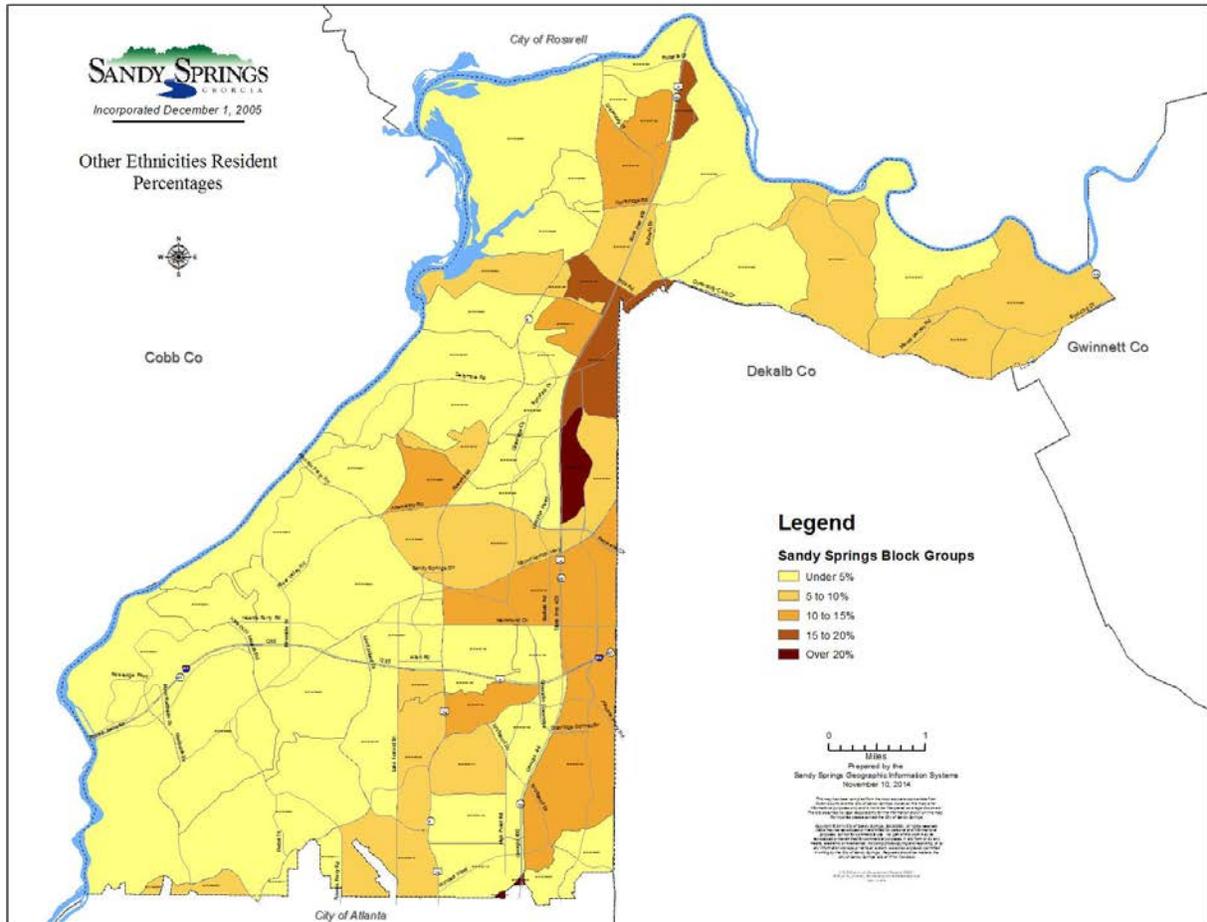
To further evaluate the racial distribution of residents in Sandy Springs, Exhibit III-33 illustrates the concentration of other ethnicities resident using 2012 ACS, 5-Year Estimates block group data.

³⁷ Census 2012, ACS 5-Year Estimates

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Exhibit III-33: Percentage of Other Ethnicities Resident in Sandy Spring by Block Group³⁸



³⁸ Census 2012, ACS 5-Year Estimates

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Section III.

Evaluation of Jurisdiction's Current Fair Housing Legal Status

As part of the AI, a review was conducted on the number and types of fair housing complaints filed in Sandy Springs. In Georgia, several agencies are involved in tracking and resolving complaints.

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. Those who feel they have experienced discrimination under the Federal Fair Housing Act can file a complaint with FHEO through HUD's website at www.hud.gov.

The U.S. Department of Justice will bring suit on behalf of individuals who file complaints with HUD in cases where there is reason to believe a person or entity has engaged in a pattern or practice of discrimination or where a denial or rights to a group of persons raises an issue of general public importance. In cases involving discrimination in mortgage loans or home improvement loans, the department may file suit under the Fair Housing Act or the Equal Credit Opportunity Act.

The Georgia Commission on Equal Opportunity enforces the Georgia Fair Housing Law O.C.G.A 8-3-200, *et seq*, which is substantially equivalent to Federal fair housing law and prohibits various forms of discrimination in residential real estate transactions on the basis of race, color, religion, sex, national origin, disability and familial status. Those who feel they have experienced discrimination under the Georgia Fair Housing Law can also file a complaint with the Commission.

Finally, Atlanta Metro Fair Housing (AMFH), 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.

In addition to FHIP, FHEO has also provided federal funding to fair housing enforcement agencies since enactment of the 1968 Civil Rights Act. Regulations published at 24 CFR Part 115 provide authority to FHEO to fund initial capacity-building for fair housing agencies, followed by

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ongoing support for complaint processing, administrative costs, special enforcement actions, training and other projects designed to enhance the fair housing agency's administration and enforcement of fair housing law. The Georgia Commission on Equal Opportunity is the recipient of FHAP funding in Georgia. FHAP agencies are used by HUD for the referral of complaints for investigation under a substantially equivalent local fair housing law.

The Fair Housing Division of the Georgia Commission on Equal Opportunity (GCEO) and Metro Atlanta Fair Housing were contacted in September 2014 concerning fair housing complaints in Sandy Springs that may have occurred over the last 3-5 years, no information regarding complaints was provided by Teresa Chappell, Fair Housing Division Director of GCEO. The Community Planning and Development of HUD indicates that no fair housing complaints within Sandy Springs have been received to date.

Section IV. Identification of Impediments to Fair Housing Choice

Public Sector

Comprehensive Plan

Sandy Springs completed its Comprehensive Plan in June 2007 and submitted the plan to the state of Georgia's Department of Community Affairs (DCA) in November 2007. The state approved the city as a Qualified Local Government in December 2007. The Comprehensive Plan is the policy framework that articulates the direction of future strategic actions to be taken by Sandy Springs to preserve and enhance the city's quality of life. Some of the policies articulated in the Comprehensive Plan include:

- ✚ Housing
- ✚ Homelessness
- ✚ Community Development Block Grant Program
- ✚ Natural Resources
- ✚ Historic Preservation
- ✚ Economic Development
- ✚ Redevelopment
- ✚ Land Use
- ✚ Community Facilities and Services
- ✚ Intergovernmental Coordination
- ✚ Recreation and Parks
- ✚ Transportation

The 2027 Comprehensive Plan has a number of policies that encourage and support housing, promote fair housing and a high quality of life for Sandy Springs residents including the following:

Housing

1. Quality housing and a range of housing sizes, costs and densities should be encouraged;
2. Provision of a variety of home styles, densities and price ranges in locations that are accessible to jobs and services should be encouraged to ensure housing for individuals and families of all incomes and age groups;
3. Encourage the redevelopment of apartment complexes to condominiums and mixtures of housing types, including detached, single-family starter homes where feasible;
4. Encourage attached housing for seniors in mixed-use developments and areas designated for live-work;
5. Encourage "life cycle" or "mixed generation" communities that provide for persons of different age groups (including seniors) to live in the same community as they age;

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6. Housing should be made available for seniors and disabled persons that contain a single-level with no-step entrances and wide doorways;
7. Avoid regulations and practices that would discourage the provision of housing for persons with disabilities;
8. Mixed-income housing is encouraged in live-work areas;
9. City zoning and development ordinances should provide for innovations in housing types and allow for deviations from development standards for projects that demonstrate consistency with affordable housing objectives;
10. In approving mixed-use redevelopment projects, especially those in the Regional Transit-Oriented Activity Center Character Area, compare the mix of housing unit types provided with affordable housing needs identified for the Perimeter area;
11. Encourage the creation of, and cooperate with, community-based housing organizations in the pursuit of more affordable, detached single-family dwellings suitable for workforce households; and
12. Capitalize, where appropriate, on existing county, state and federal grant programs as they relate to housing.

Economic Development

1. A range of job types should be provided in each community to meet the diverse needs of the local workforce;
2. Focus primarily on redevelopment, including the implementation of specific strategies for the revitalization and redevelopment of the Roswell Road corridor and Town Center area; and
3. Educational and training opportunities should be readily available in the City to permit residents to improve their job skills, adapt to technological advances or pursue entrepreneurial ambitions.

Redevelopment

1. Redevelopment areas in Sandy Springs should be pedestrian and transit friendly; and
2. Continue the provision of public streetscape improvements in areas targeted for redevelopment, including upgraded sidewalks, additional pedestrian lighting, and street furniture.

Community Facilities and Services

1. Work cooperatively with nonprofit agencies and Fulton County in meeting the human/social service needs of the City's residents; and
2. Ensure the equitable distribution of public facilities and services to all residents of Sandy Springs.

Intergovernmental Coordination Policies

1. Encourage Transit-oriented Development adjacent to MARTA facilities; and

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2. Cooperate with GDOT to improve traffic safety operations, functions and aesthetics on Roswell Road.

Recreation and Parks

1. Provide facilities to meet specific needs of population groups not presently served by recreation facilities such as special needs groups and seniors; and
2. Provide a wider range of programs to those age groups presently underserved.

Transportation

1. Improve sidewalk and bicycle routes to provide alternate travel options with emphasis on connections to parks, green space and the Central Business District; and
2. Focus transportation improvements on traffic calming, sidewalk implementation, transit access and crossing safety, which includes Safe Routes to School Program, traffic calming, sidewalk implementation and refurbishment and coordination with MARTA regarding bus stop locations and crossing safety.

Zoning and Site Selection

The City has policies in place to promote mix housing and exert the neutral effect on the existence of such concentrations. Also, the City encourages cluster development and the development of mixed income housing developments that provide a variety of unit types; the City's regulation do not restrict the location of housing for persons with disabilities. The City's policies regarding housing mix are as follows:

1. Quality housing and a range of housing size, cost, and density should be encouraged in the City (Housing Opportunities QCO).
2. Encourage a variety of home styles, densities and price ranges in locations that are accessible to jobs and services to ensure housing for individuals and families of all incomes and age groups.
3. Rezoning for new, freestanding apartments is discouraged. This policy does not preclude the replacement of existing multi-family units.
4. Cluster housing (detached, single-family dwellings on small lots) is preferred in transitional areas (i.e., between commercial and low-density single-family neighborhoods) over attached housing types.
5. The redevelopment of apartment complexes to condominiums and mixtures of housing types, including detached, single-family starter homes where feasible, is encouraged.

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6. Attached housing for seniors is encouraged to be included in mixed-use developments and areas designated as appropriate for live-work. Senior housing may also be freestanding if located in community or regional live/work areas as designated on the future land use plan map. In addition to live-work areas, an assessment of detached elder units should be evaluated for their appropriateness in protected neighborhoods.
7. Encourage “life cycle” or “mixed generation” communities that provide for persons of different age groups (including seniors) to live in the same community as they age.
8. Continuing care retirement communities are encouraged in locations determined to be appropriate and compatible with surrounding residential neighborhoods.
9. Housing should be made available for seniors and disabled persons that contain a single-level with no-step entrances and wide doorways.
10. Minimum house sizes required in the zoning ordinance should not prohibit smaller units appropriate for seniors.
11. Avoid regulations and practices that would discourage the provision of housing for persons with disabilities.
12. Mobile homes are strongly discouraged in Sandy Springs. Manufactured housing is considered a permitted housing type in appropriate settings.

The City is unaware of any management policies and procedures utilized by housing providers (those providing housing to persons with disabilities and homeless persons) that could result in opposition to such housing. A Fair Housing Brochures in English and Spanish have been distributed to each apartment community within the City and to all social service providers in the City.

The impact of the City’s zoning ordinance(s), building codes, and other land use or fiscal policies on the provision of lower-income housing has been aggressive in the enforcement of building and property maintenance codes, thus ensuring that the city’s lower-income housing stock is well maintained. Since 2005, when Sandy Springs was incorporated, the condition of the City’s lower-income housing stock has improved significantly.

Sandy Springs has very little vacant land available for development. The City’s zoning regulations encourages medium and high density residential development, particularly where is good access to mass transit and jobs. Reduced frontages as well as front and side yard setbacks are allowed per the Zoning Code. Sandy Springs not only allows, but the City Council has approved higher density development within the City.

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The Metropolitan Planning Organization and the Atlanta Regional Commission (ARC) does focus on the region's housing, housing related issues and problems. Sandy Springs is an active participant in these discussions. Participation in the ARC is the best way to address the FHP process from the regional perspective.

Neighborhood Revitalization, Municipal and Other Services/ Employment-Housing-Transportation Linkage

Transportation for the City consist of mass transit that is available primarily along commercial corridors and within activity centers. Social services within Sandy Springs are located in close proximity to the Roswell Road corridor and the mass transit service along this corridor. Schools are located throughout the City. 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.

Accessible transportation services are available primarily along the Roswell Road corridor and within activity centers. However, MARTA does operate a special transit service within Sandy Springs for persons with disabilities that provides enhanced service. Health services are available throughout Sandy Springs, but are most concentrated in activity centers along Roswell Road and near the hospital district. 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 intersection of Peachtree Dunwoody and Johnson Ferry Roads, all within walking distance of the MARTA Medical Center subway station. All of the aforementioned services are equally distributed throughout the geographic area of the City.

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.

Since the City was established in late 2005, Sandy Springs has pushed apartment owners to keep their properties in good repair, via our Code Enforcement efforts. This has resulted in the sale of apartment properties where owners were unwilling to make the necessary repairs to new owners who were willing to make the investment needed to renovate these properties. The underlying goal of these Code Enforcement efforts is to ensure decent and safe housing to residents of the City. Apartment owners are required to submit inspection reports to the City for their properties annually.

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The City has a strategy to ensure decent and safe housing to all residents of Sandy Springs. This strategy has resulted in the creation of the Apartment Inspection Program. Each year we evaluate the program and make changes as warranted.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders³⁹

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

³⁹ 2014, Teresa Davis, Chief Mortgage Finance Officer, Housing Authority of Fulton County, Georgia
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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

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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.

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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)].

HAFC will determine whether a participant family may move out of HAFC'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. HAFC will notify the family of its determination in accordance with the approval policy set forth in the Administrative Plan.

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HUD requires HAFC to assist families in their housing search by providing the family with a list of landlords or other parties known to HAFC who may be willing to lease a unit to the family, or to help the family find a unit. Although HAFC cannot maintain a list of owners that are pre-qualified to participate in the program, owners may indicate to HAFC 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)]. HAFC 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 HAFC. The HAFC maintains a listing of such owners and provides this listing to the HCV family as part of the informational briefing packet.

The HAFC 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 HAFC's jurisdiction;
- For families eligible under portability, an explanation of portability. HAFC 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 HAFC 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

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- 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.

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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 the 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.

Promotion of Accessible Housing Resources

HAFC assists all HCV participants in finding housing, as stated in Question 10 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

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- 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 assists all HCV participants in finding housing, as stated in Question 10 above. 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 Displacement⁴⁰

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.

⁴⁰ 2014, Teresa Davis, Chief Mortgage Finance Officer, Housing Authority of Fulton County, Georgia

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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.

Property Tax Policies

Residents of Sandy Springs can take advantage of property tax relief. The relief policies includes the following:

1. Statewide school exemption
2. County tax exemption
3. Fulton County exemption
4. Local school tax exemption
5. Fulton County full tax exemption
6. Exemptions for 65 or older
7. State exemption (no income requirement)
8. Surviving spouse of peace officer or firefighter
9. Disabled veterans
10. Veterans surviving spouse

These policies and provisions benefit lower income homeowners by the capping eligibility by maximum allowable income, either as a dollar amount or percent of federal poverty level. There is no reference to minority populations, although any minorities that are eligible in terms of income would benefit from these provisions that lower property taxes. The only mention is for persons with disabilities.

Planning and Zoning Boards

The Board of Appeals (formerly known as Board of Zoning Appeals) is a quasi-legal board charged with hearing requests for variances from regulations of the Zoning Ordinance. The board bases decisions on the merits of applications with strict adherence to specific factors. The board consist of four Caucasian males, one African American male, and two Caucasian females.

The Planning Commission is an advisory board which reports its findings and recommendations to the Mayor and City Council. The board is involved in hearings involving re-zonings, use permits, concurrent variances, and changes to zoning maps and ordinances. The board consist of six Caucasian males and one Caucasian female.

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Building Codes (Accessibility)

An internal review of the Sandy Springs' Zoning Ordinance, building codes and other city programs and policies was completed to assess potential fair housing concerns as part of the Analysis of Impediments to Fair Housing. The review did not identify any areas that could negatively affect fair housing choice. The analysis followed the suggested approach outlined in the HUD Office of Fair Housing and Equal Opportunity's *Fair Housing Planning Guide* for reviewing public sector policies. The city's zoning ordinance, building codes and land use controls were found to have a neutral effect on the promotion and the development of affordable housing.

Since its incorporation, Sandy Springs has taken an active role in the enforcement of its property maintenance code that requires property owners to maintain their properties. Particular emphasis was initially placed on inspection and compliance efforts to address long-standing deterioration of the exteriors of apartment developments in the city. The city's apartment inspection ordinance now ensures a percentage of units are certified as in compliance with the code on a rotating basis to maintain the housing quality of rental units in Sandy Springs.

Private Sector

Lending Policies and Practices

Typically, mortgage lending data, legal and fair housing complaints filed for a jurisdiction are included in an Analysis of Impediments to Fair Housing. Community Reinvestment Act (CRA) and Home Mortgage Disclosure Act (HMDA) data are examined to determine if there is evidence of potential or existing discrimination in lending or community disinvestment. Complaints concerning fair housing are a means to identify the kinds of discrimination that may be present, as well as how to address the conditions that led to those complaints. Evaluation of CRA and HMDA data can help to illuminate issues with investment or lending practices that may exist in Sandy Springs.

Community Reinvestment Act (CRA) Compliance

A federal law enacted in 1977, the Community Reinvestment Act," is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound operations"⁴¹ CRA was enacted by 12 U.S.C. 2901 and implemented through regulations published at 12 CFR Part 228. The regulations were revised in May 1995 and August 2005.

⁴¹ Federal Reserve Board website

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In summary, the CRA requires that a depository institution's lending practices be periodically evaluated for consistency with the law. CRA examinations are conducted by four federal agencies responsible for overseeing these institutions. These institutions include the following:

1. Federal Reserve Board
2. Office of Thrift Oversight
3. Office of the Comptroller of the Currency
4. Federal Deposit Insurance Corporation

In addition, the Federal Financial Institutions Examination Council (FFIEC) maintains interagency information on a depository institution's compliance with CRA. In conducting a broad overview of local banks, information on 2 banks and lending institutions located or with branches in Sandy Springs were found, both were found to have satisfactory ratings on their most recent CRA audits. Unfortunately, with mergers, online lending and other available loan options it has become more difficult to determine the true extent of a lender's compliance with the intent of the CRA, which is to provide lending to the community where they are located. Therefore, it is important to examine Home Mortgage Disclosure Act data for a more complete picture of the availability of credit in a local community.

Home Mortgage Disclosure Act (HMDA)

The best source for determining the lending patterns in a community and whether there is discrimination in lending activity is to use Home Mortgage Disclosure Act (HMDA) data. Congress passed HMDA in 1975 for two purposes as described in the Act:

1. To provide the citizens and public officials of the United States with sufficient information to enable them to determine whether depository institutions are filling their obligations to serve the housing needs of the communities and neighborhoods in which they are located; and
2. To assist public officials in their determination of the distribution of public sector investments in a manner designed to improve the private investment environment.

HMDA also requires depository institutions and mortgage lenders to:

1. Disclose each year the action taken on all residential mortgage loan applications. This includes applications to purchase, rehabilitate or refinance a dwelling;
2. Report this data by the race, sex and income of the borrower and by the Census Tract in which the property is located. Lenders must also report the number of loans and total loan amounts made in each Census Tract; and
3. Provide this information upon request to community groups and members of the public.

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Race and Ethnicity of Loan Applicants

Exhibit IV-I provides the aggregate data for the 24-county MSA for 2013. These statistics are for FHA, FSA/RHS, VA and other non-conventional loans by race and ethnicity.

Exhibit IV-I: 2013 Race/Ethnicity for FHA, FSA/RHS and VA Home Purchases and Mortgage Loans Originated, Denied and Other⁴²

Race/Ethnicity	Total Loan Applications	Loans Originated	Applications Denied	Other
American Indian/Alaska Native	7	6 (86%)	1 (14%)	0 (0%)
Asian	41	30 (73%)	5 (12%)	6 (15%)
Black or African American	1,050	735 (70%)	175 (17%)	140 (13%)
Nat. Hawaiian/Pacific Islander	15	12 (80%)	3 (20%)	0 (0%)
White	2,555	2,003 (78%)	302 (12%)	250 (10%)
Hispanic or Latino	148	116 (78%)	19 (13%)	13 (9%)

⁴² "Other" Category includes: Applications approved but not accepted, Applications withdrawn and Files Closed for Incompleteness for the FFIEC Aggregate Table 4-1 for FHA, FSA/RHS and VA home purchase loans.

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Of the 3,816 total loan applications for the MSA listed in Exhibit V-I, 67 percent were applications from White borrowers, 27 percent were applications from Black borrowers, 4 percent were from Hispanic/Latino borrowers and 2 percent were borrowers from the remaining racial groups. These aggregate data demonstrate that FHA, FSA/RHS and VA loan mortgage approval rates were highest for American Indians/Alaska Natives applicants (86%) followed by Native Hawaiian/Pacific Islanders (80%), White applicants (78%), Hispanic/Latinos (78%), Asians (73%), and Blacks or African Americans (70%) had the lowest loan approval rates. A more illustrative statistic, however, is that both White and Asian borrowers had the lowest denial rates at 12 percent and Native Hawaiian/Pacific Islanders had the highest denial rates at 20 percent for all race and ethnic groups for these loan products. For FHA, FSA/RHS and VA loan products, Black borrowers were almost twice as likely to be denied a loan as White borrowers.

Exhibit IV-II provides the aggregate HMDA data for the 24-county MSA for 2013 for conventional loans by race and ethnicity.

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Exhibit IV-II: 2013 Race/Ethnicity for Conventional Home Purchases and Mortgage Loans Originated, Denied and Other⁴³

Race/Ethnicity	Total Loan Applications	Loans Originated	Applications Denied	Other
American Indian/Alaska Native	111	65 (59%)	22 (20%)	24 (21%)
Asian	5,646	3,930 (70%)	665 (11%)	1,051 (19%)
Black or African American	5,261	2,829 (54%)	1,269 (24%)	1,163 (22%)
Nat. Hawaiian/Pacific Islander	107	65 (61%)	28 (26%)	14 (13%)
White	33,583	24,334 (72%)	3,301 (10%)	5,948 (18%)
Hispanic or Latino	1,710	1,084 (63%)	303 (18%)	323 (19%)

As with the data for FHA, FSA/RHS and VA loans, White borrowers had the highest conventional loan approval rate of any racial or ethnic group in 2013 when looking at aggregate data. And as with the nonconventional loan sources, White borrowers had the lowest loan denial rates and Native Hawaiian/Pacific Islanders had the highest for conventional loans. These data indicate that for conventional loan products, Black borrowers are 2.5 times more likely to be denied a mortgage than White borrowers.

⁴³ "Other" Category includes: Applications approved but not accepted, Applications withdrawn and Files Closed for Incompleteness for the FFIEC Aggregate Table 4-2 for FHA, FSA/RHS and VA home purchase loans.

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Reasons for Loan Denials

The FFIEC requires HMDA data to include the reasons for loan denials as part of financial institution reporting practices. For the Atlanta-Sandy Springs-Marietta MSA, the reasons for loan denials provide additional data for evaluating lending trends in 2013. The three most common reasons cited as justification for denial of a mortgage by a lender are the borrower’s debt-to-income ratio, employment history and credit history. Data by race and ethnicity is included for the MSA in Exhibit IV-III for non-conventional mortgages and Exhibit IV-IV for conventional mortgages. Denial rates are presented as the percent of applications that were denied for that reason by race and ethnicity.

Exhibit IV-III: Reasons for Denial of Applications for FHA, FSA/RHS and VA Home Purchase Loans for 1 to 4 Family Dwellings by Race/Ethnicity⁴⁴

Applicant Race/Ethnicity	Debt-to-Income Ratio	Employment History	Credit History
White	21%	5%	21%
Black or African American	26%	4%	22%
Asian	27%	4%	15%
American Indian/Alaska Native	21%	7%	14%
Native Hawaiian/Pacific Islander	25%	0%	8%
Hispanic/Latino	25%	5%	17%

⁴⁴ FFIEC HMDA Aggregate Table 8-1 for Atlanta-Sandy Springs-Marietta, GA MSA
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Exhibit IV-IV: Reasons for Denial of Applications for Conventional Home Purchase Loans for 1 to 4 Family Dwellings by Race⁴⁵

Applicant Race/Ethnicity	Debt-to-Income Ratio	Employment History	Credit History
White	18%	3%	17%
Black or African American	21%	2%	25%
Asian	22%	3%	10%
American Indian/Alaska Native	21%	4%	42%
Native Hawaiian/Pacific Islander	20%	0%	13%
Hispanic/Latino	21%	2%	21%

In further evaluating loan origination data⁴⁶, further, when examining Hispanic/Latino vs. Non-Hispanic/Latino borrowers, Non-Hispanic/Latino couple borrowers had the highest loan origination rates at 74 percent; female Hispanic/Latino borrowers had the lowest origination rates at 62percent.

Public and Private Sector

Fair Housing Enforcement

As part of the AI, a review was conducted on the number and types of fair housing complaints filed in Sandy Springs. In Georgia, several agencies are involved in tracking and resolving complaints.

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

⁴⁵ FFIEC HMDA Aggregate Table 8-2, Reasons for Denial of Applications for Conventional Home Purchase Loans, Atlanta-Sandy Springs-Marietta, GA MSA

⁴⁶ FFIEC HMDA Aggregate Table 4-2, Disposition of Application for Conventional Home Purchase loans, Atlanta-Sandy Springs-Marietta, GA MSA

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housing laws, FHEO also establishes national policies that ensure all Americans have equal access to the housing of their choice. Those who feel they have experienced discrimination under the Federal Fair Housing Act can file a complaint with FHEO through HUD's website at www.hud.gov.

The U.S. Department of Justice will bring suit on behalf of individuals who file complaints with HUD in cases where there is reason to believe a person or entity has engaged in a pattern or practice of discrimination or where a denial or rights to a group of persons raises an issue of general public importance. In cases involving discrimination in mortgage loans or home improvement loans, the department may file suit under the Fair Housing Act or the Equal Credit Opportunity Act.

The Georgia Commission on Equal Opportunity enforces the Georgia Fair Housing Law O.C.G.A 8-3-200, *et seq*, which is substantially equivalent to Federal fair housing law and prohibits various forms of discrimination in residential real estate transactions on the basis of race, color, religion, sex, national origin, disability and familial status. Those who feel they have experienced discrimination under the Georgia Fair Housing Law can also file a complaint with the Commission.

Finally, Atlanta Metro Fair Housing (AMFH), 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.

In addition to FHIP, FHEO has also provided federal funding to fair housing enforcement agencies since enactment of the 1968 Civil Rights Act. Regulations published at 24 CFR Part 115 provide authority to FHEO to fund initial capacity-building for fair housing agencies, followed by ongoing support for complaint processing, administrative costs, special enforcement actions, training and other projects designed to enhance the fair housing agency's administration and enforcement of fair housing law. The Georgia Commission on Equal Opportunity is the recipient of FHAP funding in Georgia. FHAP agencies are used by HUD for the referral of complaints for investigation under a substantially equivalent local fair housing law.

Informational Programs

Sandy Springs has taken on many activities, some which are confined to National Fair Housing Month. The following are some of the activities and steps the City has implemented regarding fair housing laws and objectives:

Analysis of Impediments to 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-Departments/Community-Development/Community-Development-Block-Grant/Fair-Housing-Information>

<http://www.sandyspringsga.gov/City-Departments/Community-Development/Community-Development-Block-Grant/Feria-de-Informacion-de-Vivienda>

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 is currently working on a CDBG Program 40th Anniversary, which has 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). The brochures were distributed to CAC and the City's seventy plus apartment complexes in August 2012 and in the summer of 2014.

4. As a part of annual apartment certification requirements, provided information to landlords on fair housing.

See recommendation #3 above.

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

The City has reached 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.

Analysis of Impediments to Fair Housing



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 continues to analyze the 2027 Comprehensive Plan and City Center Master Plan to ensure that affordable, workforce housing is encouraged. This has been done primarily through the creation of the Apartment Subcommittee of the Economic Development Advisory Committee. The Subcommittee's charge has been to evaluate existing housing stock, including quality and affordability.

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Section V.

Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The City's Analysis of Impediments to Fair Housing (AI) report was adopted on March 2, 2010. The AT 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-Departments/Community-Development/Community-Development-Block-Grant/Fair-Housing-Information>

<http://www.sandyspringsga.gov/City-Departments/Community-Development/Community-Development-Block-Grant/Feria-de-Informacion-de-Vivienda>

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 2014 and the CDBG Program 40th Anniversary, which has 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). The brochures were distributed to CAC and the City's seventy plus apartment complexes in August 2012 and in the summer of 2014.

4. As a part of annual apartment certification requirements, provided information to landlords on fair housing.

See recommendation #3 above.

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

Analysis of Impediments to Fair Housing



The City has reached 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 continues to analyze the 2027 Comprehensive Plan and City Center Master Plan to ensure that affordable, workforce housing is encouraged. This has been done primarily through the creation of the Apartment Subcommittee of the Economic Development Advisory Committee. The Subcommittee's charge has been to evaluate existing housing stock, including quality and affordability.

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.

Section VI. Conclusions and Recommendations

Analyzing demographic, income and housing data presented in this AI, and drawing on the Community Assessment of the Sandy Springs 2007-27 Comprehensive Plan as well, the following conditions may present impediments to fair housing choice in Sandy Springs:

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. Expanding the knowledge of fair housing law, how to identify discriminatory actions and how to file a complaint could be reasonable actions for Sandy Springs to take to promote fair housing.

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, as well as remedies available to those who may have experienced discrimination.

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 two older apartment complexes, 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.

Analysis of Impediments to Fair Housing



General Recommendations for Promoting Fair Housing

In response to the conditions described above, the list below represents some available options for furthering fair housing in Sandy Springs:

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

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

Consistent with HUD's Fair Housing Planning Guide, the Sandy Springs Analysis of Impediments to Fair Housing will be updated during the development of the city's 2018-2022 Consolidated Plan.

**Analysis of Impediments to
Fair Housing**



**Section VII.
Signature Page**

CITY OF SANDY SPRINGS APPROVALS

City Council: _____ Date: _____
(Mayor)

Attest: _____ Date: _____
(City Clerk)