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# 2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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## COBB COUNTY, GEORGIA

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# I. EXECUTIVE SUMMARY

## A. Background

Cobb County, as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) is required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that the County:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI);
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state and federal law. The federal Fair Housing Act defines impediments as:

*Any actions, omissions or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability which restrict housing choices or the availability of housing choice.*

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and possible actions to overcome the identified impediments.

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling or renting of housing because of a person's race, color, religion or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Fair Housing Act, protects individual's right to rent an apartment, buy a home,

obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

### Why Assess Fair Housing?

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: the Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, including Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG, currently Emergency Solutions Grant), and Housing Opportunities for Persons with AIDS (HOPWA), as well as additional program components that have been enacted since such as the Neighborhood Stabilization Program and the Housing Trust Fund.

As a part of the consolidated planning process (24 CFR 91), states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts and requires:

Conducting an Analysis of Impediments to Fair Housing Choice (AI);

- Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintaining records reflecting the analysis and actions taken.

HUD interprets these three certifying elements to entail:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all people;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published providing program participants with an approach to more effectively and efficiently incorporate into the planning process the duty of affirmatively furthering the policies of the Fair Housing Act. The purpose of this rule was to refine the prior analysis of impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of

Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On Friday, January 5, 2018, HUD published Federal Notice Document 2018-00106, titled: *Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants*. This notice advises that HUD is extending the deadline for submission of an Assessment of Fair Housing (AFH) by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020, and in many cases after 2025. Per the guidance, the Cobb County will continue to meet the obligation of affirmatively furthering fair housing by conducting an Analysis of Impediments to Fair Housing Choice.

## **B. Research Methodology and Citizen Participation**

Thus, the purpose of the *2020 Cobb County Analysis of Impediments to Fair Housing Choice* is to research, analyze and identify prospective impediments to fair housing choice and to suggest actions that the County can consider in working toward eliminating, overcoming or mitigating the identified impediments.

The 2020 Cobb County Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout Cobb County. This information was collected and evaluated through four general approaches:

1. *Primary Research* – the collection and analysis of raw data that did not previously exist.
2. *Secondary Research* – the review of existing data and studies.
3. *Quantitative Analysis* – the evaluation of objective, measurable and numerical data.
4. *Qualitative Analysis* – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the County’s housing marketplace were drawn from the 2010 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the 2020 Cobb AI.

## Citizen Participation

- **Stakeholder Surveys in conjunction with this Analysis-** a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

The Fair Housing Survey was designed to collect input from a broad spectrum of the community and received responses from Cobb County residents and non-residents. The survey consisted of 24 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 449 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the full survey respondents.

Surveys were received over from February 3, 2020 to April 1, 2020. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent “ballot stuffing”, the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

- **Stakeholder Interviews** – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), municipal officials, County staff, fair housing advocates, members of the Board of Commissioners, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.
- **Public Meetings** – Eight public meetings were held to provide a forum for Cobb County residents and other interested parties to contribute to this Analysis. These meetings were held at a variety of locations to provide options for residents to attend. These meetings were advertised via flyers distributed by Cobb County using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

## C. Prior Impediments and Recommendations

The County’s 2015 The Analysis to Impediments to Fair Housing (AI) contained a discussion and action steps for the impediments as listed below. Since the development of the prior AI, the County has continued to meet annually with municipalities, service providers, and local nonprofits to address these impediments with concrete strategies and actions.

### **Impediment #1- Lack of Fair Housing Education**

Although education and outreach in the County is limited, the County has been praised for its success at sustaining education with new initiatives including the establishment of a fair housing hotline and bus advertisements. As helpful as these efforts are, numerous indicators point to the need to do even more. Public opposition to affordable rental and for-sale housing suggests that residents may not fully understand the benefits available with affordable housing. Education and awareness of fair housing laws is imperative to alleviating housing discrimination. More than half of survey respondents stated they did not know where to file a fair housing complaint. The survey also supports the notion that increased education is also needed for landlords and property owners. Of those respondents to the survey believing they had been discriminated against, 73.3% said the discrimination had been perpetrated by a landlord or property owner. As the County continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

### **Impediment #2 – Disparities in Mortgage Lending**

While HMDA data does not indicate substantial variations in loan outcomes or reasons for denial related to applicant gender, access to mortgage lending does vary by race and ethnicity. African American, Latino, and other minority races are less likely to apply for home purchase loans than Whites. Of those that complete applications, African Americans and Latinos are denied loans twice as frequently as Whites; lending institutions, meanwhile, are less likely to report reasons for these denials than they are denials to White applicants. Further, loan origination rates tend to be lower and denial rates higher in areas with higher concentrations of minority population. The presence of disparities alone is not evidence enough to prove outright discrimination (there may be legitimate factors such as credit score, job history, and collateral that result in these loan denial patterns) but they do have the effect of limiting the housing choice of would-be borrowers.

### **Impediment #3 - Zoning Provisions**

Restricting Residential Uses from Residential Districts Cobb County's zoning code and the zoning ordinances of the County's individual municipalities are generally supportive of housing choice for people with disabilities who may desire group living arrangements, although the size of group homes permitted in residential zoning districts is kept at six or fewer residents. Such small-scale group homes are permitted by the County in nearly every residential zoning district. However, facilities housing recovering alcohol and drug abusers for the purpose of their reintegration into society are classified differently from other group homes and are generally restricted by the County and its municipalities to non-residential zoning districts. In some cases, these facilities are confined only to heavy industrial districts theoretically alongside chemical storage and heavy manufacturing operations. If the only housing choices available to this group of persons are in non-residential districts, residents will be deprived of the usual social interactions that normally take place in residential areas. These zoning regulations pose a significant impediment to fair housing choice for some Cobb County residents.

### **Impediment #4 - Lack of Accessibility to Public Transportation**

Despite the extensive public transportation system, residents in less centrally located along the Cobb Parkway Corridor and the East-West Connector have limited access to public transit. Transit in remote areas of the County is limited to programs related to human services trips and privately

operated service. However, program related services do provide trips for the elderly, disabled, and low-income riders. Of survey respondents reporting public transportation needs, the highest need reported was that public transportation service availability does not coincide with work schedules. This lack of availability was reported by 37.96% of respondents.

Evidence has shown a major link between public transportation, employment and affordable housing opportunities throughout the nation. As public transportation is inefficient means to Page providing access to employment. The availability and accessibility of public transportation is critical in efforts to expand affordable housing to groups in need and to Protected Classes. Based on the conversations with non-profits, community leaders and observations from survey results, and transportation data, the data has revealed limitations to transportation exist in West Cobb (Powder Springs and Austell) and North Cobb (Acworth) which has limited access to local and express bus routes. Also, the data revealed limitations in accessibility to public transportation for commuters traveling east to west in Cobb County, due to the limited lack access to transit stops and connections. As the lack of accessibility to public transportation restricts commuting in and around the County and has the potential to adversely influence housing choice. About 42% of survey respondents expressed that public transportation did not connect to major employers.

### **Impediment #5 - High Housing Costs**

Affordability is an important aspect in regards to fair housing choice and individuals being able to obtain secure, safe, and decent housing. It is also a significant factor for residents attempting to select housing that meets their current family needs. Homeowners or renters who are paying more than 30 percent of their income on housing-related costs are at risk for experiencing cost burdens. The quantitative data obtained from the Census Bureau and HUD, supported by comments provided by County residents, key stakeholders, and the Community Survey, demonstrate that a significant number of households in Cobb County have insufficient income to afford appropriate housing. Currently, less than half of the County's population are paying less than the ideal 30% of their income for housing costs. Housing choices are fundamentally limited by household income and purchasing power, in which low and moderate income persons in the County have significantly restricted housing choices.

## **D. New Impediments to Fair Housing Choice and Recommendations**

### **Impediment 1: Lack of Affordable Housing**

There is a lack of affordable housing in the Cobb County due to the County's population growth and influx of higher priced housing construction. This has created a high demand on a limited affordable housing supply, and a corresponding increase in the cost of rental and sales housing.

**Goal:** Increase the supply of affordable housing by new construction and rehabilitation of various types of housing which is affordable to lower income households.

**Strategies:** In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.

- Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing throughout the County.
- Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.

### **Impediment 2: Lack of Accessible Housing**

There is a lack of accessible housing in Cobb County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in the County and the desire of disabled persons who want to live independently. Interviews indicated that all accessible housing is occupied, and the County's disabled population is growing.

**Goal:** Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

**Strategies:** In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- Financially assist in improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to remain in their homes.
- Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- Encourage and financially support landlords to make reasonable accommodations to units in their building so persons who are disabled can continue to reside in their apartments.
- Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

### **Impediment 3: Barriers Limiting Housing Choice**

There are physical, economic, and social barriers (including older inaccessible housing, credit requirements that prevent all residents from obtaining mortgages, and concentrations of poverty and racial or ethnic minorities) in Cobb County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

**Goal:** Eliminate physical, economic, and social barriers in the County and increase housing choices and opportunities for low-income households and members of the protected classes throughout the County.

**Strategies:** In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- Support and promote the development of affordable housing in areas of opportunity where minority and low-income persons and families may reside.
- Promote and support the development of affordable housing for minorities and low-income households who are being “forced out” of their homes and may not have housing resources to relocate.
- Support and promote sound planning principals and make revisions to land development and zoning ordinances to eliminate “exclusionary zoning,” which restricts the development of affordable housing.

#### **Impediment 4: Lack of Fair Housing Awareness**

There is a continuing need to educate and promote the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA), awareness of discriminatory practices, and combat “NIMBYism.” A total of 63.3% of survey respondents in the County believed that a lack of education about fair housing contributed to unreported problems.

**Goal:** Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discrimination laws, and regulations, so that the residents in Cobb County can Affirmatively Further Fair Housing (AFFH) and eliminate the negative attitude of “Not In My Back Yard”(NIMBYism).

**Strategies:** In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending is not taking place.
- Publish and distribute housing information and applications in both English and Spanish to address the increase in Limited English Proficiency residents in Cobb County.
- Educate residents and local officials to eliminate neighborhood misconceptions and combat “NIMBYism.”

## **II. COMMUNITY CHARACTERISTICS**

### **A. Historical Profile**

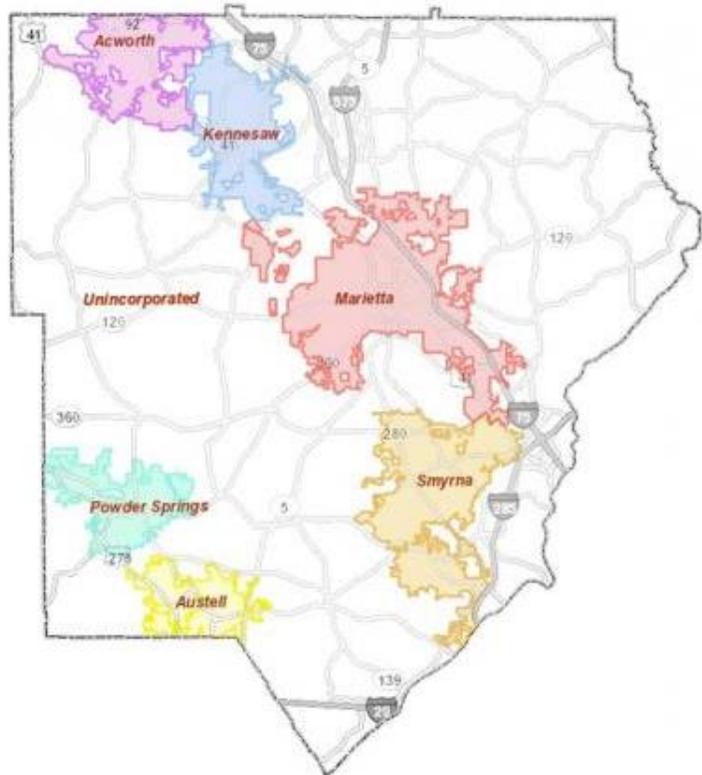
Cobb County is the third largest county in the state of Georgia by population, with an estimated 756,865 residents. Stretching over 340 square miles, Cobb County is one of the largest and fastest growing counties in Georgia. Cobb County is bordered by Cherokee County to the north, Paulding County to the west, Bartow County to the northwest, Fulton County to the southeast and Douglas County to the southwest. Cobb County is home to Dobbins Air Reserve Base, Lockheed Martin, Six Flags over Georgia, the Atlanta Braves, and four Fortune 500 companies.

In 1832, the State Legislature passed an act creating Cobb County, named after former U.S. Senator, Representative, and Superior Court Judge Thomas Willis Cobb of Greensboro. It is believed that the county seat, Marietta, was named after his wife Marie. The land was originally home to Native American settlements including Sweet Water Town on Sweetwater Creek (southwest of Marietta), Big Shanty (later Kennesaw) on Noonday Creek (north of Marietta) and Buffalo Fish (southeast of Marietta). Located in the upper Piedmont region, Cobb County had few large plantations, developing instead around small subsistence farms.

Towns and settlements grew after the U. S. Army removed the Cherokees to western lands in 1838. Marietta was settled in 1833, became the county seat in 1834, and received its official charter in 1852. For the first two years no courthouse existed and court business was conducted in settler's cabins, then in 1834 legislation funded a courthouse in newly-formed Marietta. Other towns established in the 1830s were Springville (later Powder Springs, 1838) and Roswell (1839). Roswell was then annexed to Fulton County in 1932. Acworth became a community in the early 1840s and received its city charter in 1860. Big Shanty, which got its name from the shanty town for railroad construction workers, received its town charter as Kennesaw in 1887. Smyrna Camp Ground, which later shortened its name to Smyrna, was incorporated in 1872. Austell was settled in the late 1800s and chartered in 1885.

During the Civil War, Union forces occupied Marietta and the neighbouring towns. Several battles were fought in Cobb during June and July 1864, including the Battle of Kennesaw Mountain. After the war, Cobb residents saw the railroad built, small industries established, and a gradual increase in commerce. The abundance of railroads and early industrial development helped establish Cobb County and its incorporated cities. During that time, unincorporated Cobb County experienced little growth, with Marietta being the only area with a significant population. Farms began to decrease during the 1940s. During the advent of World War II, Cobb experienced an onset of growth. Marietta Army Airfield was built in 1943, bringing with it the opening of Bell Aircraft Corporation bomber plant and nearly 30,000 jobs. While Bell closed the plant at the end of the war, the subsequent Korean War led Lockheed, an aircraft manufacturing company, to reopen the plant in 1951. Around the same time, Marietta Army Airfield became Dobbins Air Force Reserve Base, with Naval Air Station Atlanta added to the campus a short time later. The combination of the three helped drive the economic engine of the County and set the stage for the rapid growth that was to come.

Because of the jobs that were available in the 1950s and 1960s, combined with the lack of a robust transportation network, there was a need for housing in close proximity to employment. The southern and central areas of Cobb, which served as the commercial/industrial core of the County, began to experience rapid residential growth in a transitional neighborhood development pattern with affordable homes, well connected streets and pedestrian scale blocks. At that time, there was still considerable separation between Cobb County and the City of Atlanta. The completion of Interstate 75 in the 1970s significantly decreased travel times, altering growth and development patterns. Cobb became more integrated into the Atlanta Metropolitan Area and a second phase of intense growth began. Through the 1970s, 1980s, and 1990s, eastern Cobb and later northern Cobb experienced character changes through the advent of automobile-oriented, higher density, cul-de-sac subdivisions and strip commercial developments along transecting arterial roadways. Growth soon caused the county to face the challenge of preserving its rich past, while accommodating the demand for new development. The first major step taken by Cobb County toward protecting its past was the passage of a countywide historic preservation ordinance in 1984, which established the Cobb County Historic Preservation Commission.



As land availability in eastern and northern Cobb became scarce, the County's residential growth continued to progress in a seemingly counter clockwise fashion toward western Cobb in the 1990s and 2000s. During this time, large-lot residential subdivisions were being built in relatively rural areas and commercial activity centers, learning from the inadequacies of the strip commercial corridors, were characterized by well-defined, compact commercial nodes at strategic intersections of arterial roadways. Development pressures in western Cobb continue to put strain on services and infrastructure in the area.

As the "counter clockwise" development progression of Cobb County has come full circle, redevelopment initiatives have started to renew the southern region of the County, along with revitalization in the cities of Marietta and Smyrna. As these locations were the first to experience the rapid growth, they are now the first to experience the redevelopment and revitalization of underperforming commercial centers and destabilized neighborhoods.

Cobb County has thrived in recent decades. It's natural beauty, location in the Atlanta metropolitan region, financial and economic environment, education and most importantly, it's people, have made Cobb County a desirable place to live, work, and play. These great assets have contributed to sustained growth over the past few decades and will continue to attract visitors, residents and businesses in the years to come. The County's rapid growth has transformed it from a small rural community to an integral part of one of the fastest growing metropolitan regions in the United States. As Cobb continues its transformation, more emphasis will need to be placed on redevelopment and neighborhood revitalization due to constraints on land availability. In order for the County to expand its tax base and provide a high level of service to its residents, property

owners, and businesses, Cobb County should work to balance growth through quality redevelopment and new greenfield development, all while preserving stable neighborhoods.

## B. Demographic Profile

Demographic data was analyzed and obtained from the 2010 U.S. Census 2010-2017 American Community Survey (ACS). The primary source of demographic data used in this study comes from the U.S. Census Bureau. The American Community Surveys (ACS) provides the most recent demographic data as well as important information use to show the trends in population and household changes over the years.

### Population

According to ACS estimates, Cobb County Georgia has experienced an 8.5% increase in population with the population increasing from 688,078 to 755,754 in 2017. The population makeup consists of 363,936 males and 388,847 females.

### Age and Sex Over the Years

According to the 2017 American Community Survey 5 Year Estimates, the median age of Cobb County Residents is 36.7 years old. The largest concentration of residents is in the 25-44 age range with 216,115 making up this population. The senior citizen population of 65 and over has experienced a 32.7% increase. With this observation, the County will need to take into consideration the growing number of the elderly when developing community housing plans. Overall the largest demographic is 18-64 years old at 451,619. In terms of sex, females have historically slightly outnumbered males within the County. That trend has continued during the period under review, as women edged out men 51.6% to 48.4% as of the 2017 census, up slightly from 51.4 % to 48.6% in 2010.

| Age                | AGE & SEX POPULATION CHARACTERISTICS |                |                |                |                |                |
|--------------------|--------------------------------------|----------------|----------------|----------------|----------------|----------------|
|                    | 2010                                 |                |                | 2017           |                |                |
|                    | Both Sexes                           | Male           | Female         | Both Sexes     | Male           | Female         |
|                    | <b>688,078</b>                       | <b>334,369</b> | <b>353,709</b> | <b>755,754</b> | <b>365,295</b> | <b>390,459</b> |
| Under 18 years     | 176,487                              | 89,812         | 86,675         | 181,097        | 91,302         | 89,795         |
| 18 to 24 years     | 62,867                               | 32,141         | 30,726         | 68,254         | 34,630         | 33,624         |
| 25 to 44 years     | 209,610                              | 101,521        | 108,089        | 217,337        | 105,242        | 112,095        |
| 45 to 64 years     | 179,142                              | 85,103         | 94,039         | 199,729        | 95,139         | 104,590        |
| 65 years and over  | 59,972                               | 25,792         | 34,180         | 89,337         | 38,982         | 50,355         |
| Median age (years) | 35.4                                 | 34.2           | 36.4           | 36.7           | 35.5           | 37.8           |

Table 1. Age & Sex Population Characteristics, Source: U.S. Census Bureau ACS Estimates, www.census.gov

### Households

According to the 2017 ACS 1 Year Estimates Survey, there are currently 277,609 households in Cobb County. Currently the household size for an overall household size is 2.69 and the family size is 3.24 this number differs slightly from the family size for a married couple which is 3.26. Un married partner households are comprised of .30% same sex couples and 4.0% opposite couples.

| <b>HOUSEHOLD TYPE</b>         |             |                               |             |
|-------------------------------|-------------|-------------------------------|-------------|
| <b>2010</b>                   |             | <b>2017</b>                   |             |
| In married-couple family      | 61.50%      | In married-couple family      | 60.30%      |
| In other households           | 37.80%      | In other households           | 38.40%      |
| <b>MARITAL STATUS</b>         |             |                               |             |
| Never married                 | 32.70%      | Never married                 | 33.90%      |
| Now married, except separated | 51.20%      | Now married, except separated | 50.10%      |
| Divorced or separated         | 12.10%      | Divorced or separated         | 11.90%      |
| Widowed                       | 4.00%       | Widowed                       | 4.20%       |
| <b>Average household size</b> | <b>2.67</b> | <b>Average household size</b> | <b>2.69</b> |
| <b>Average family size</b>    | <b>3.24</b> | <b>Average family size</b>    | <b>3.24</b> |

Table 2. Source: U.S. Census Bureau ACS Estimates, www.census.gov

| <b>HOUSEHOLDS AND FAMILIES</b>      |              |  |  |   |                            |
|-------------------------------------|--------------|--|--|---|----------------------------|
|                                     | <b>Total</b> | <b>Married-couple family household</b> | <b>Male householder, no wife present, family household</b> | <b>Female householder, no husband present, family household</b> | <b>Nonfamily household</b> |
| <b>Total households</b>             | 277,609      | 139,532                                | 10,417   | 39,240  | 88,420                     |
| <b>Average household size</b>       | 2.69         | 3.26                                   | 3.71   | 3.38  | 1.35                       |
| <b>FAMILIES</b>                     |              |  |  |   |                            |
| <b>Total families</b>               | 189,189      | 139,532                                | 10,417   | 39,240  | n/a                        |
| <b>Average family size</b>          | 3.24         | 3.24                                   | 3.33   | 3.21  | n/a                        |
| <b>UNMARRIED-PARTNER HOUSEHOLDS</b> |              |  |  |   |                            |
| <b>Same sex</b>                     | 0.30%        | n/a                                    | n/a  | n/a   | n/a                        |
| <b>Opposite sex</b>                 | 4.00%        | n/a                                    | n/a  | n/a   | n/a                        |

Table 3. Source: U.S. Census Bureau ACS Estimates, www.census.gov

### Race and Ethnicity

The County's racial makeup consisted of 59.60% White; 27.80% Black or African American; 0.10% American Indian and/or Native Alaskan; 5.2% Asian; 0.0% Pacific Islander; 4.10% from other races; and 3.20% from two or more races; 13.10% were Hispanic or Latino of any race.

| <b>RACE AND ETHNICITY</b>                                       |                |                   |
|---|----------------|-------------------|
|   | <b>Number</b>  | <b>Percentage</b> |
| <b>Total Population</b>   | <b>755,754</b> | <b>100%</b>       |
| White   | 450,424        | 59.60%            |
| Black or African American                                       | 209,769        | 27.80%            |
| American Indian and Alaska Native                               | 1,128          | 0.10%             |
| Asian   | 39,499         | 5.20%             |
| Asian Indian  | 14,407         | 1.90%             |
| Chinese   | 7,902          | 1.00%             |
| Filipino  | 2,705          | 0.40%             |
| Japanese  | 887            | 0.10%             |
| Korean  | 5,545          | 0.70%             |
| Vietnamese  | 5,076          | 0.70%             |
| Other Asian   | 2,977          | 0.40%             |
| Native Hawaiian and Other Pacific Islander                      | 62             | 0.00%             |
| Some other race   | 30,619         | 4.10%             |
| Two or more races   | 24,253         | 3.20%             |
| White and Black or African American                             | 8,835          | 1.20%             |
| White and American Indian and Alaska Native                     | 2,095          | 0.30%             |
| White and Asian   | 5,336          | 0.70%             |
| Black or African American and American Indian and Alaska Native | 1,669          | 0.20%             |
| <b>HISPANIC OR LATINO AND RACE</b>                              |                |                   |
| Hispanic or Latino  | 98,915         | 13.10%            |
| Mexican   | 53,129         | 7.00%             |
| Puerto Rican  | 7,711          | 1.00%             |
| Cuban   | 2,585          | 0.30%             |
| Other Hispanic or Latino  | 35,490         | 4.70%             |

Table 4. Source: U.S. Census Bureau ACS Estimates, [www.census.gov](http://www.census.gov)

### Origin and Ancestry

According to U.S. Census Bureau, 2013-2017 American Community Survey Estimates, there were approximately 126,475 Foreign born individuals in Cobb County. The majority of the foreign born population originated from Latin American at 49%, while another notable portion comes from Asia at 28.30%.

| <b>FOREIGN BORN POPULATION</b> |  |   |
|--------------------------------|--|---|
| <b>Foreign born</b>            | <b>Foreign born; Naturalized citizen</b> | <b>Foreign born; Not a U.S. citizen</b> |
| 126,475                        | 57,053                                   | 69,422                                  |

Table 5. Source: U.S. Census Bureau ACS Estimates, [www.census.gov](http://www.census.gov)

| REGION OF BIRTH OF FOREIGN BORN                          |         |
|--|---------|
| Foreign-born population excluding population born at sea | 126,475 |
| Europe   | 8.40%   |
| Asia   | 28.30%  |
| Africa   | 12.80%  |
| Oceania  | 0.10%   |
| Latin America  | 49.00%  |
| Northern America   | 1.40%   |

Table 6. Source: U.S. Census Bureau ACS Estimates, [www.census.gov](http://www.census.gov)

The following table presents the ancestry of Cobb County residents in 2017. The most common ancestries identified other than American were, English (10.3%), German (8.3%), and Irish (7.8%).

| Ancestry Type           | Number         | %           |
|-------------------------|----------------|-------------|
| <b>Total population</b> | <b>755,754</b> | <b>100%</b> |
| American                | 40,605         | 5.4%        |
| Arab                    | 4,259          | 0.6%        |
| British                 | 7,520          | 1.0%        |
| Czech                   | 1,190          | 0.2%        |
| Danish                  | 1,619          | 0.2%        |
| Dutch                   | 6,520          | 0.9%        |
| English                 | 77,567         | 10.3%       |
| European                | 10,052         | 1.3%        |
| French (except Basque)  | 12,650         | 1.7%        |
| French Canadian         | 1,854          | 0.2%        |
| German                  | 62,438         | 8.3%        |
| Greek                   | 2,277          | 0.3%        |
| Hungarian               | 1,625          | 0.2%        |
| Irish                   | 59,251         | 7.8%        |
| Italian                 | 28,953         | 3.8%        |
| Lithuanian              | 458            | 0.1%        |
| Norwegian               | 3,912          | 0.5%        |
| Polish                  | 14,271         | 1.9%        |
| Portuguese              | 791            | 0.1%        |
| Russian                 | 4,686          | 0.6%        |
| Scotch-Irish            | 10,149         | 1.3%        |
| Scottish                | 16,626         | 2.2%        |
| Slovak                  | 1,955          | 0.3%        |
| Sub-Saharan African     | 28,228         | 3.7%        |
| Swedish                 | 4,324          | 0.6%        |
| Swiss                   | 1,578          | 0.2%        |
| Ukrainian               | 467            | 0.1%        |
| Welsh                   | 4,309          | 0.6%        |

Table 7. Source: U.S. Census Bureau ACS Estimates, [www.census.gov](http://www.census.gov)

## Limited English Proficiency

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is discrimination based on a person’s inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

Consistent with the national origin data, Spanish is, by far, the most commonly spoken language among LEP individuals in Cobb County. The LEP population of the Cobb County has increased rapidly since 1990, nearly reaching regional levels. Though English is prodminately spoken, roughly 20% of the population speak other languages, which suggests a need for accomadations of those non-English speaking residents.

| LANGUAGE SPOKEN AT HOME              | 2018           |
|--------------------------------------|----------------|
| <b>Population 5 years and over</b>   | <b>710,095</b> |
| English only                         | 80.10%         |
| Language other than English          | 19.90%         |
| Speak English less than "very well"  | 6.50%          |
| Spanish                              | 10.80%         |
| Speak English less than "very well"  | 4.30%          |
| Other Indo-European languages        | 4.70%          |
| Speak English less than "very well"  | 1.20%          |
| Asian and Pacific Islander languages | 2.60%          |
| Speak English less than "very well"  | 0.90%          |
| Other languages                      | 1.70%          |
| Speak English less than "very well"  | 0.20%          |

Table 8. Source: U.S. Census Bureau 2018 ACS Estimates, [www.census.gov](http://www.census.gov)

According to the 2014-2018 American Community Survey, 19.9% of residents speak a language other than English at home. Of those residents, 6.5% report that they speak English less than “very well.” The following languages are spoken at home:

- English 80.1%
- Spanish or Spanish Creole 10.8%
- Other Indo-European languages 4.7%
- Asian and Pacific Island languages 2.6%
- Other languages 1.7%

The two largest non-English speaking populations in the County are Spanish and Other Indo-European speakers.

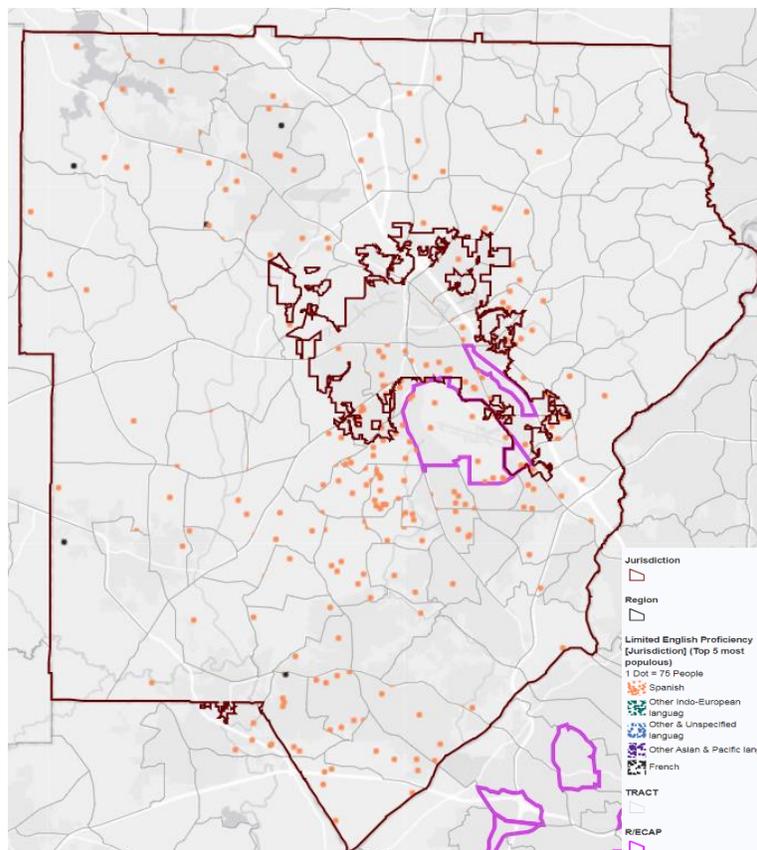
### C. Income Profile

The income and poverty profile presents an overview of household income analyzing data elements including household size, low-income population, and percentage on median family household in poverty. As noted in the table below, the median household income for Cobb County increased from \$69,713 in 2012 to \$72,004 in 2017, while the median family income also increased from \$85,484 in 2012 to \$86,091 in 2017.

#### HOUSEHOLD INCOME

|                                | 2017                 |             | 2012                 |             |
|--------------------------------|----------------------|-------------|----------------------|-------------|
|                                | Number of Households | Percentage  | Number of Households | Percentage  |
| <b>Total Households</b>        | <b>274,361</b>       | <b>100%</b> | <b>259,715</b>       | <b>100%</b> |
| Less than \$10,000             | 12,611               | 4.60%       | 11,427               | 4.4%        |
| \$10,000 to \$14,999           | 7,548                | 2.80%       | 8,311                | 3.2%        |
| \$15,000 to \$24,999           | 18,416               | 6.70%       | 20,258               | 7.8%        |
| \$25,000 to \$34,999           | 23,227               | 8.50%       | 21,816               | 8.4%        |
| \$35,000 to \$49,999           | 34,125               | 12.40%      | 31,166               | 12.0%       |
| \$50,000 to \$74,999           | 47,530               | 17.30%      | 44,411               | 17.1%       |
| \$75,000 to \$99,999           | 35,955               | 13.10%      | 34,802               | 13.4%       |
| \$100,000 to \$149,999         | 47,583               | 17.30%      | 43,892               | 16.9%       |
| \$150,000 to \$199,999         | 23,313               | 8.50%       | 21,556               | 8.3%        |
| \$200,000 or more              | 24,053               | 8.80%       | 22,076               | 8.5%        |
| <b>Median Household Income</b> | <b>\$72,004</b>      |             | <b>\$69,713</b>      |             |

Table 9. Source: U.S. Census Bureau ACS Estimates, [www.census.gov](http://www.census.gov)



Race/Ethnicity Cobb County. Source: HUD-provided map for AFH analysis, <https://egis.hud.gov/affht/>

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing. For a project or program to qualify for CDBG funds, 51% of the program beneficiaries must be low- to moderate-income as defined by HUD. The following table reflects the current HUD income limits for one to eight-person households who earn at or below 80% of the Area Median Income (AMI) for Cobb County, Georgia. The CDBG Program provides annual grants on a formula basis to Entitlement Communities to support viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low-and moderate-income persons.

| Household Size | Extremely Low 30% | Very Low Income 50% | Low Income 80% |
|----------------|-------------------|---------------------|----------------|
| 1              | \$16,750          | \$27,900            | \$44,650       |
| 2              | \$19,150          | \$31,900            | \$51,000       |
| 3              | \$21,550          | \$35,900            | \$57,400       |
| 4              | \$23,900          | \$39,850            | \$63,750       |
| 5              | \$25,850          | \$43,050            | \$68,850       |
| 6              | \$27,750          | \$46,250            | \$73,950       |
| 7              | \$29,650          | \$49,450            | \$79,050       |
| 8              | \$31,550          | \$52,650            | \$84,150       |

**2019 CDBG MAXIMUM HOUSEHOLD INCOME LIMITS**  
 Table 10. Source: U. S. Department of Housing and Urban Development (HUD)  
[www.huduser.gov](http://www.huduser.gov)

On February 14, 2019, HUD CPD-10-02 Notice that updated the Department’s Low- and Moderate-Income Summary Data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). These data will replace the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis (“Area Benefit” or LMA). The table below highlights the current low- and moderate-income block groups that have a population of more than 51% low- and moderate-income. Cobb County has an overall low- and moderate-income population of 37.50%.

| Tract | Blckgrp | Lowmod | Lowmod Total Population | Lowmod_pct |
|-------|---------|--------|-------------------------|------------|
| 30902 | 4       | 430    | 840                     | 51.19%     |
| 30103 | 1       | 1155   | 2250                    | 51.33%     |
| 30905 | 2       | 430    | 835                     | 51.50%     |
| 31509 | 2       | 1015   | 1960                    | 51.79%     |
| 30413 | 1       | 965    | 1860                    | 51.88%     |
| 31404 | 1       | 520    | 1000                    | 52.00%     |
| 30310 | 1       | 780    | 1495                    | 52.17%     |
| 31406 | 1       | 535    | 1025                    | 52.20%     |
| 31310 | 1       | 885    | 1685                    | 52.52%     |
| 30344 | 3       | 250    | 475                     | 52.63%     |
| 31409 | 1       | 1480   | 2805                    | 52.76%     |
| 31408 | 3       | 610    | 1155                    | 52.81%     |
| 31116 | 3       | 90     | 170                     | 52.94%     |
| 31404 | 3       | 680    | 1280                    | 53.13%     |
| 31211 | 3       | 280    | 525                     | 53.33%     |
| 30229 | 2       | 1345   | 2515                    | 53.48%     |
| 31405 | 1       | 905    | 1690                    | 53.55%     |
| 31409 | 2       | 1175   | 2175                    | 54.02%     |
| 31507 | 1       | 1220   | 2250                    | 54.22%     |
| 31005 | 2       | 1390   | 2540                    | 54.72%     |
| 30506 | 1       | 1290   | 2355                    | 54.78%     |
| 31114 | 3       | 860    | 1560                    | 55.13%     |
| 30413 | 3       | 1145   | 2075                    | 55.18%     |
| 30405 | 1       | 1445   | 2610                    | 55.36%     |
| 31106 | 4       | 1630   | 2925                    | 55.73%     |
| 30344 | 1       | 1340   | 2400                    | 55.83%     |
| 30215 | 3       | 885    | 1560                    | 56.73%     |
| 31503 | 3       | 1955   | 3445                    | 56.75%     |
| 31312 | 1       | 765    | 1345                    | 56.88%     |
| 30106 | 3       | 1845   | 3235                    | 57.03%     |
| 31101 | 3       | 705    | 1235                    | 57.09%     |
| 31404 | 4       | 265    | 460                     | 57.61%     |
| 31311 | 1       | 2185   | 3785                    | 57.73%     |
| 31309 | 1       | 890    | 1510                    | 58.94%     |

| Tract | Blckgrp | Lowmod | Lowmod Total Population | Lowmod_pct |
|-------|---------|--------|-------------------------|------------|
| 30405 | 4       | 340    | 575                     | 59.13%     |
| 30905 | 4       | 565    | 930                     | 60.75%     |
| 31505 | 1       | 1480   | 2435                    | 60.78%     |
| 31108 | 1       | 360    | 590                     | 61.02%     |
| 31114 | 1       | 2135   | 3470                    | 61.53%     |
| 31308 | 3       | 1485   | 2395                    | 62.00%     |
| 30601 | 1       | 2000   | 3225                    | 62.02%     |
| 30800 | 3       | 695    | 1115                    | 62.33%     |
| 31506 | 2       | 1185   | 1885                    | 62.86%     |
| 30905 | 3       | 2225   | 3510                    | 63.39%     |
| 30104 | 2       | 1725   | 2695                    | 64.01%     |
| 31110 | 1       | 1615   | 2520                    | 64.09%     |
| 31311 | 2       | 1750   | 2730                    | 64.10%     |
| 30904 | 1       | 985    | 1530                    | 64.38%     |
| 31004 | 1       | 1790   | 2770                    | 64.62%     |
| 31108 | 3       | 1800   | 2725                    | 66.06%     |
| 31308 | 2       | 1455   | 2190                    | 66.44%     |
| 30228 | 2       | 805    | 1210                    | 66.53%     |
| 30504 | 4       | 305    | 455                     | 67.03%     |
| 30700 | 1       | 925    | 1380                    | 67.03%     |
| 30345 | 1       | 1810   | 2695                    | 67.16%     |
| 30505 | 3       | 1020   | 1515                    | 67.33%     |
| 30106 | 1       | 1600   | 2365                    | 67.65%     |
| 31506 | 3       | 425    | 625                     | 68.00%     |
| 30405 | 3       | 1245   | 1830                    | 68.03%     |
| 30505 | 4       | 1385   | 2035                    | 68.06%     |
| 31406 | 2       | 1865   | 2725                    | 68.44%     |
| 31405 | 5       | 750    | 1095                    | 68.49%     |
| 30904 | 2       | 1185   | 1725                    | 68.70%     |
| 30227 | 1       | 1380   | 2000                    | 69.00%     |
| 30412 | 3       | 280    | 400                     | 70.00%     |
| 31101 | 2       | 890    | 1270                    | 70.08%     |
| 31108 | 4       | 1025   | 1450                    | 70.69%     |
| 31114 | 4       | 375    | 530                     | 70.75%     |

Table 11: HUD Low Mod Income Summary Data, <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>

| Tract | Blckgrp | Lowmod | Lowmod Total Population | Lowmod_pct |
|-------|---------|--------|-------------------------|------------|
| 30104 | 1       | 675    | 950                     | 71.05%     |
| 30411 | 1       | 725    | 1015                    | 71.43%     |
| 30414 | 1       | 1460   | 2040                    | 71.57%     |
| 31311 | 3       | 2090   | 2885                    | 72.44%     |
| 31310 | 3       | 1800   | 2440                    | 73.77%     |
| 30602 | 2       | 85     | 115                     | 73.91%     |
| 31002 | 3       | 1450   | 1960                    | 73.98%     |
| 31503 | 4       | 1600   | 2160                    | 74.07%     |
| 30228 | 4       | 1020   | 1375                    | 74.18%     |
| 30344 | 2       | 545    | 730                     | 74.66%     |
| 31406 | 3       | 2565   | 3415                    | 75.11%     |
| 30904 | 3       | 1270   | 1680                    | 75.60%     |
| 30504 | 3       | 1340   | 1770                    | 75.71%     |
| 30412 | 1       | 305    | 400                     | 76.25%     |
| 30902 | 1       | 985    | 1285                    | 76.65%     |
| 31309 | 3       | 2260   | 2940                    | 76.87%     |
| 30414 | 2       | 700    | 910                     | 76.92%     |
| 30700 | 3       | 615    | 795                     | 77.36%     |
| 30411 | 2       | 790    | 1010                    | 78.22%     |
| 30228 | 1       | 1855   | 2370                    | 78.27%     |
| 31408 | 1       | 660    | 840                     | 78.57%     |
| 30411 | 3       | 1230   | 1565                    | 78.59%     |
| 30505 | 2       | 1420   | 1800                    | 78.89%     |
| 31002 | 4       | 1605   | 2025                    | 79.26%     |
| 31004 | 3       | 1915   | 2415                    | 79.30%     |
| 30412 | 2       | 2635   | 3315                    | 79.49%     |
| 31115 | 1       | 1785   | 2240                    | 79.69%     |
| 31004 | 4       | 1015   | 1270                    | 79.92%     |
| 30700 | 4       | 515    | 640                     | 80.47%     |
| 30800 | 1       | 975    | 1185                    | 82.28%     |
| 30902 | 2       | 1895   | 2285                    | 82.93%     |
| 30904 | 4       | 1345   | 1615                    | 83.28%     |
| 30413 | 2       | 1770   | 2110                    | 83.89%     |
| 31101 | 1       | 1825   | 2150                    | 84.88%     |
| 31004 | 2       | 930    | 1090                    | 85.32%     |

Table 11: HUD Low Mod Income Summary Data, <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>

As depicted in the following Low and Moderate Income Block Group Map, the low and moderate-income census tracts are generally located in the central and southwest section of the county. There is some overlap of higher minority concentration in the in the low- and moderate-income census tracts in the south-central section of the county. It should be noted that the borders of the Census Tracts and Block Groups do not correspond to the boundaries of the county.

**COBB COUNTY LOW AND MODERATE-INCOME BLOCK GROUPS**

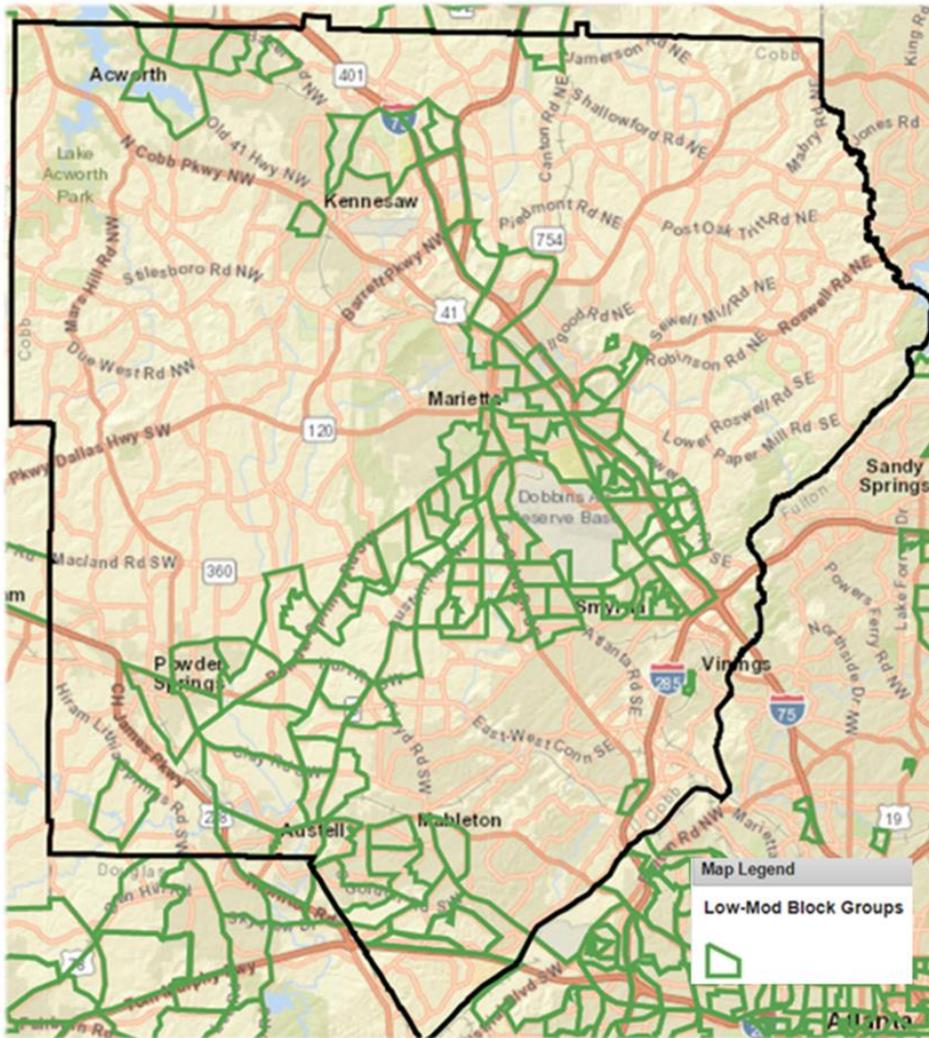


Figure 2. Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

**Percentage of Poverty in Cobb County**

The percentage of families living in poverty experienced a decrease from 9.0% in 2012 to 7.5% in 2017, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 30.2% in 2012 and 23.9% in 2017, according to U.S. Census and ACS data. There was an increase in all people whose income level was below poverty level from 9% in 2012 to 10.9% in 2017. Individuals under the age of 18 whose income was below the poverty level was 10.2% in 2012 and 9.6% in 2017, according to U.S. Census and ACS data. The County’s poverty statistics for families with children are highlighted in the chart below.

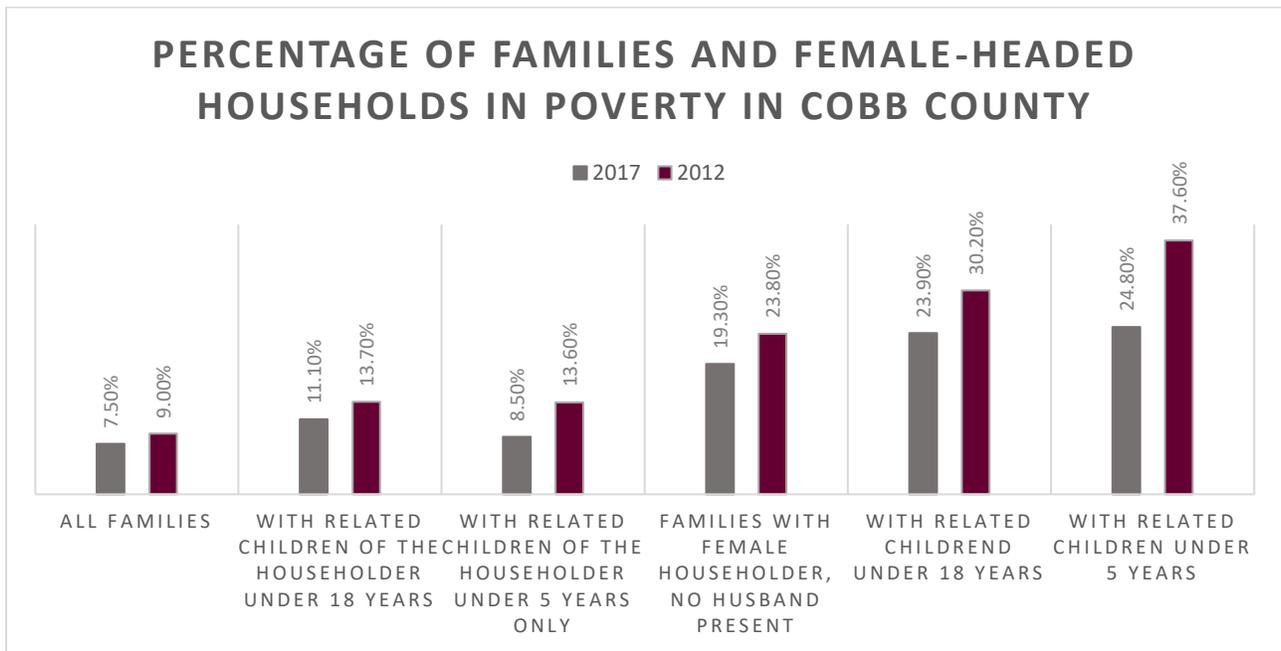


Figure 3. Source: U.S. Census Bureau ACS Estimates, [www.data.census.gov](http://www.data.census.gov)

#### D. Employment Profile

Data regarding the labor force, defined as the total number of persons working or looking for work and employment is gathered from the decennial census and American Community Survey estimates are presented below.

Cobb County has the highest educated residents in the state of Georgia with 29% of the residents having a bachelor’s degree and 15% having a graduate or professional degree. Cobb County is home to Kennesaw State University, the third-largest public state university with an enrollment of over 35,000 students, Life University, and Chattahoochee Technical College with workforce development programs available at little-to-no-cost.

#### UNEMPLOYMENT RATES IN COBB COUNTY

| Year              | 2016 | 2017 | 2018 | 2019 |
|-------------------|------|------|------|------|
| Unemployment Rate | 4.6% | 4.1% | 3.4% | 3.0% |

Table 12 Source: Bureau of Labor Statistics, Local Area Unemployment Statistics, <https://data.bls.gov/pdq/SurveyOutputServlet>

#### Jobs Held by Residents

In 2018, 70.2% of Cobb County’s civilian employed population of residents 16 years of age and over were part of the labor force; according to the 2018 American Community Survey. The following charts illustrate the categories of workers and their occupations.

The largest portion of Cobb County workers are in management, business, science, and arts occupations. Almost fifteen percent of all workers are in “service occupations,” while almost a quarter are in “sales and office occupations.” Workers had a mean travel time to work of approximately 32 minutes. According to the

2018 American Community Survey, an estimated 22.2% of households in Cobb County receive income from Social Security. The mean Social Security Income for 2018 was \$21,356.

| <b>OCCUPATION CHARACTERISTICS</b>                |                                      |                                 |
|--|--------------------------------------|---------------------------------|
| <b>Occupations of Cobb County Residents</b>      | <b>Estimated number of Residents</b> | <b>% Employed by Occupation</b> |
| Civilian employed population 16 years and over   | 389,803                              |                                 |
| Management, business, science, and arts          | 179,537                              | 46.1%                           |
| Sales and office                                 | 87,870                               | 22.5%                           |
| Service  | 58,270                               | 14.9%                           |
| Production, transportation, and material moving  | 36,205                               | 9.3%                            |
| Natural resources, construction, and maintenance | 27,921                               | 7.2%                            |

Table 13. Source: 2018 American Community Survey, [www.census.gov](http://www.census.gov)

The vast majority of workers (83.4%) in Cobb County were classified as Private Wage and Salary workers, as of 2018.

| <b>Worker Class Characteristics</b>                    |                                      |                                   |
|--|--------------------------------------|-----------------------------------|
| <b>Worker Class in Cobb County</b>                     | <b>Estimated number of Residents</b> | <b>% Employed by Worker Class</b> |
| Civilian employed population 16 years and over         | 389,803                              |                                   |
| Private wage and salary workers                        | 325,288                              | 83.4%                             |
| Government workers                                     | 39,619                               | 10.2%                             |
| Self-employed in own not incorporated business workers | 24,556                               | 6.3%                              |
| Unpaid family workers                                  | 340                                  | 0.1%                              |

Table 14. Source: 2018 American Community Survey, [www.census.gov](http://www.census.gov)

**Major Employers**

As of December 2019, Retail Trade (10.8%), Health Care and Social Assistance (10.55%), Administrative and Support and Waste Management (9.9%), Accommodation and Food Services (9.6%), Professional, Scientific, and Technical Services (9.4%) comprise the top five largest employment markets for Cobb County.

| INDUSTRY EMPLOYMENT DISTRIBUTION                 |                     |                          |
|--|---------------------|--------------------------|
| Industry Sector                                  | Number of Employees | Number of Establishments |
| Retail Trade                                     | 40,499              | 2,092                    |
| Health Care and Social Assistance                | 39,646              | 2,123                    |
| Administrative and Support and Waste Management  | 37,006              | 1,478                    |
| Accommodation and Food Services                  | 35,930              | 1,626                    |
| Professional, Scientific, and Technical Services | 35,304              | 3,619                    |
| Construction                                     | 29,466              | 1,693                    |
| Educational Services                             | 24,587              | 513                      |
| Wholesale Trade                                  | 23,271              | 1,668                    |
| Manufacturing                                    | 18,604              | 637                      |
| Finance and Insurance                            | 15,862              | 1,304                    |

Table 15. Source: Georgia Dept. of Labor, Workforce Statistics & Economic Research, Quarterly Census of Employment and Wages Program, <https://dol.georgia.gov/view-workforce-information>

Below is a list of the largest employers within Cobb County, as of December 31, 2019.

| MAJOR EMPLOYERS IN COBB COUNTY |                                |
|--------------------------------|--------------------------------|
| Home Depot, Inc.               | Zep, Inc.                      |
| Lockheed Martin                | Seefried Industrial Properties |
| Kennesaw State University      | Dematic Corp.                  |
| Wellstar Kennestone Hospital   | Wellstar Cobb Hospital         |
| GE Power                       | Cobb County Police Dept.       |

Table 16. Source: Georgia Labor Market Explorer, <https://explorer.gdol.ga.gov/>

## E. Housing Profile

Fair housing is also concerned with the availability of a range of housing types and prices. This section provides an overview of the housing market and of the dynamics affecting housing availability by analyzing the characteristics of housing stock, housing conditions, housing market sales, foreclosure data, owner/renter affordability, and housing problems.

### Characteristics of Housing

The predominant housing type in Cobb County remains single-family detached homes which accounted for 66.9% percent of the County's housing stock in 2018. The County's housing stock was comprised of 286,561 housing units in 2010. Since then, a total of 16,083 housing units were added to the housing inventory which consists of 302,644 total housing units in 2018.

Of the total housing units in the County in 2018, 283,094 (93.5%) were single-family detached housing units and 26,128 (8.7%) were single family attached housing units. There was a total of 24,301 (8%) of 2-9 units, 21,705 (7.2) of 10-19 units, and 22,865 (7.6%) of 20 or more units. In 2018, the County also had 4,430 (1.5%) mobile home structures in its inventory with no while boats, RVs, and vans. The following table shows the inventory of all housing units in Cobb County.

**COBB COUNTY HOUSING DISTRIBUTION BY HOUSING TYPE**

| <b>Housing Occupancy Status</b>     | <b>2010</b>    | <b>Percent (%)</b> | <b>2018</b>    | <b>Percent (%)</b> |
|-------------------------------------|----------------|--------------------|----------------|--------------------|
| <b>Total Housing Units</b>          | <b>286,561</b> | <b>100%</b>        | <b>302,644</b> | <b>100%</b>        |
| <b>Occupied Housing Units</b>       | 256,175        | 89.4%              | 283,094        | 93.5%              |
| <b>Vacant Housing Units</b>         | 30,386         | 10.6%              | 19,550         | 6.5%               |
| <b>Homeowner Vacancy Rate</b>       | 4.2            | (x)                | 1.2            | (x)                |
| <b>Rental Vacancy Rate</b>          | 12.4           | (x)                | 5.1            | (x)                |
| <b>Type of Unit:</b>                |                |                    |                |                    |
| <b>1-unit detached</b>              | 189,967        | 66.3%              | 201,141        | 66.9%              |
| <b>1-unit attached</b>              | 20,080         | 7%                 | 26,128         | 8.7%               |
| <b>2 Units</b>                      | 2,534          | .9%                | 2,010          | 0.7%               |
| <b>3 or 4 Units</b>                 | 8,035          | 2.8%               | 6,130          | 2%                 |
| <b>5 to 9 Units</b>                 | 15,653         | 5.5%               | 16,161         | 5.4%               |
| <b>10 to 19 Units</b>               | 26,849         | 9.4%               | 21,705         | 7.2%               |
| <b>20 or more units</b>             | 20,138         | 7%                 | 22,865         | 7.6%               |
| <b>Manufactured or Mobile Homes</b> | 3,305          | 1.2%               | 4,430          | 1.5%               |
| <b>Boat, RV, van, etc.</b>          | 0              | 0.0%               | 0              | 0%                 |
| <b>Owner/Renter</b>                 |                |                    |                |                    |
| <b>Occupied Housing Units</b>       | <b>256,175</b> | <b>(x)</b>         | <b>283,094</b> | <b>(x)</b>         |
| <b>Owner-Occupied</b>               | 173,758        | 67.8%              | 182,749        | 64.6%              |
| <b>Renter-Occupied</b>              | 82,417         | 32.2%              | 100,345        | 35.4%              |

Table 17. Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates, [www.census.gov](http://www.census.gov)

**Housing Supply**

According to the 2018 American Community Survey (ACS), Cobb County has 283,094 occupied housing units. Of these units, 64.6 percent are owner-occupied and 35.4 percent are renter occupied.

Vacancy rates are an indicator of housing needs. While vacancies help moderate housing costs, excess vacancies depress rents and home values. Generally, an “optimal” vacancy rate is 1.5 percent to 2.0 percent in the for-sale market and 5.0 percent to 6.0 percent for the rental market. According to the 2018 ACS estimates, the vacancy rate among homeowners is 1.2 percent; among renters, 5.1 percent. These percentages indicate a high level of utilization of the County’s available housing units.

**Housing Condition – Age**

Like any other asset, housing gradually deteriorates over time. If not regularly maintained, housing can deteriorate into disrepair, depress neighboring property values, discourage reinvestment, and eventually impact quality of life in an entire neighborhood. Maintaining quality housing is thus an important community goal. This section analyzes and discusses the age and condition of the County’s housing.

Much of the housing stock in the county has aged, as evidenced by 25 percent of the housing stock being built between 1980 and 1989 and it at least 30-40 years old. Within the housing industry, as a general rule, homes older than 30 years begin to require major investments to maintain quality. Necessary improvements include

siding, painting, and roofing, among others. After 50 years, homes typically need new plumbing, electrical systems, mechanical systems, lead-based paint removal, and other major repairs. The majority (21.7%) of the housing units were built between 1990 and 1999. The following table chart details the year that housing structures were built in the County as of 2018.

**AGE OF HOUSING STOCK: YEAR UNIT BUILT BY TENURE**

|                              | <b>2018</b>    | <b>Percentage (%)</b> |
|------------------------------|----------------|-----------------------|
| <b>Total Housing Units</b>   | <b>286,561</b> | <b>100%</b>           |
| <b>Built 2005 or later</b>   | 17,237         | 6%                    |
| <b>Built 2000 or 2004</b>    | 38,685         | 13.5%                 |
| <b>Built 1990 or 1999</b>    | 62,211         | 21.7%                 |
| <b>Built 1980 or 1989</b>    | 78,221         | 27.3%                 |
| <b>Built 1970 or 1979</b>    | 49,518         | 17.3%                 |
| <b>Built 1960 or 1969</b>    | 21,579         | 7.5%                  |
| <b>Built 1950 or 1959</b>    | 12,368         | 4.3%                  |
| <b>Built 1940 or 1949</b>    | 3,781          | 1.3%                  |
| <b>Built 1939 or earlier</b> | 2,961          | 1%                    |

Table 18 Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates, [www.census.gov](http://www.census.gov)

**Housing Costs**

**Owner Occupied Housing**

Per the U.S. Census Bureau, the median value for a home in 2010 was \$206,700. In 2010, the largest percent of homes were valued between \$200,000 and \$299,999 (26.1%). Comparatively, in 2018, the majority of homes in Cobb were valued between \$300,000 and \$499,999 (30.2%). In 2018, the median value for a home in Cobb County was \$278,700.

**HOUSING VALUES**

|                             | <b>2018</b>    | <b>Percentage (%)</b> |
|-----------------------------|----------------|-----------------------|
| <b>Owner-occupied units</b> | <b>182,749</b> | <b>100%</b>           |
| Less than \$50,000          | 3,891          | 2.1%                  |
| \$50,000 to \$99,999        | 4,061          | 2.2%                  |
| \$100,000 to \$149,999      | 16,763         | 9.2%                  |
| \$150,000 to \$199,999      | 28,035         | 15.3%                 |
| \$200,000 to \$299,999      | 48,393         | 26.5%                 |
| \$300,000 to \$499,999      | 55,184         | 30.2%                 |
| \$500,000 to \$999,999      | 22,539         | 12.3%                 |
| \$1,000,000 or more         | 3,883          | 2.1%                  |
| <b>Median (Dollars)</b>     | <b>278,700</b> | <b>(X)</b>            |

Table 19 Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates, [www.census.gov](http://www.census.gov)

The median Selected Monthly Owner Costs (SMOC) for households with a mortgage in the County was \$1,622 in 2018. The median SMOC for 2010 was \$1,641. Monthly owner costs slightly decreased by 1.16% from 2010 to 2018. In 2018 there was a total of 132,084 households with a mortgage. More than 40,032 (30.3%) of the households were paying between \$1,000 and \$1,400 in monthly housing costs. Of the units without a mortgage, 17,735 (34.3%) were paying between \$400 and \$599 in monthly housing costs. As noted in the following table only 21.4% of households have housing costs over 30% of their incomes.

**MORTGAGE STATUS**

|  | <b>Estimate</b> | <b>Percent</b> |
|--|-----------------|----------------|
| <b><i>Owner-occupied units</i></b>   | <b>182,749</b>  | <b>100%</b>    |
| Housing units with a mortgage  | 132,025         | 72.2%          |
| Housing units without a mortgage   | 50,724          | 27.8%          |
| <b>SELECTED MONTHLY OWNER COSTS (SMOC)</b>   |                 |                |
| <b><i>Housing units with a mortgage</i></b>  | <b>132,025</b>  | <b>100.00%</b> |
| Less than \$500  | 884             | 0.7%           |
| \$500 to \$999   | 17,305          | 13.1%          |
| \$1,000 to \$1,499   | 40,032          | 30.3%          |
| \$1,500 to \$1,999   | 28,336          | 21.5%          |
| \$2,000 to \$2,499   | 21,757          | 16.5%          |
| \$2,500 to \$2,999   | 12,426          | 9.4%           |
| \$3,000 or more  | 11,285          | 8.5%           |
| Median (dollars)   | 1,622           | (X)            |
| <b><i>Housing units without a mortgage</i></b>   | <b>50,724</b>   | <b>100%</b>    |
| Less than \$250  | 4,281           | 8.4%           |
| \$250 to \$399   | 15,389          | 30.3%          |
| \$400 to \$599   | 17,375          | 34.3%          |
| \$600 to \$799   | 8,038           | 15.8%          |
| \$800 to \$999   | 2,944           | 5.8%           |
| \$1,000 or more  | 2,697           | 5.3%           |
| Median (dollars)   | 462             | (X)            |
| <b>SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME (SMOCAPI)</b>                |                 |                |
| <b><i>Housing units with a mortgage (excluding units where SMOCAPI cannot be computed)</i></b>   | <b>131,509</b>  | <b>(X)</b>     |
| Less than 20.0 percent   | 71,747          | 54.6%          |
| 20.0 to 24.9 percent   | 18,885          | 14.4%          |
| 25.0 to 29.9 percent   | 12,773          | 9.7%           |
| 30.0 to 34.9 percent   | 7,461           | 5.7%           |
| 35.0 percent or more   | 20,643          | 15.7%          |
| Not computed   | 516             | (X)            |
| <b><i>Housing unit without a mortgage (excluding units where SMOCAPI cannot be computed)</i></b> | <b>50,266</b>   | <b>(X)</b>     |
| Less than 10.0 percent   | 33,365          | 66.4%          |
| 10.0 to 14.9 percent   | 7,740           | 15.4%          |
| 15.0 to 19.9 percent   | 2,820           | 5.6%           |
| 20.0 to 24.9 percent   | 2,080           | 4.1%           |
| 25.0 to 29.9 percent   | 889             | 1.8%           |
| 30.0 to 34.9 percent   | 1,031           | 2.1%           |
| 35.0 percent or more   | 2,341           | 4.7%           |
| Not computed   | 458             | (X)            |

Table 20 Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates, [www.census.gov](http://www.census.gov)

## Renter Housing

The supply of rentals has increased between 2010 and 2018 by almost 20,000 units. There were 79,310 occupied units paying rent in 2010 and 98,590 occupied units paying rent in 2018. The median monthly rent in 2010 was \$934 and increased to \$1,236 per month in 2018. The following table estimates rental rates within the County according to the 2006-2010 and 2014- 2018 ACS data.

| <b>GROSS RENT</b>                        |               |             |
|--|---------------|-------------|
| <b><i>Occupied units paying rent</i></b> | <b>98,590</b> | <b>100%</b> |
| Less than \$500                          | 1,469         | 1.50%       |
| \$500 to \$999                           | 22,238        | 22.60%      |
| \$1,000 to \$1,499                       | 50,092        | 50.80%      |
| \$1,500 to \$1,999                       | 19,029        | 19.30%      |
| \$2,000 to \$2,499                       | 3,678         | 3.70%       |
| \$2,500 to \$2,999                       | 1,230         | 1.20%       |
| \$3,000 or more                          | 854           | 0.90%       |
| Median (dollars)                         | 1,236         |             |
| No rent paid                             | 1,755         |             |

Table 21 Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates, [www.census.gov](http://www.census.gov)

The following table illustrates the housing costs for renter households according to the American Community Survey. HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 10% of renter households were cost burdened and 46.7% of renter households in 2018 were cost burdened. While rents in real dollars has increased, renter housing costs burdens have also increased as renter household incomes decreased.

| <b>GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME (GRAPI)</b>                             |               |             |
|---|---------------|-------------|
| <b><i>Occupied units paying rent (excluding units where GRAPI cannot be computed)</i></b> | <b>96,768</b> | <b>100%</b> |
| Less than 15.0 percent  | 12,182        | 12.60%      |
| 15.0 to 19.9 percent  | 14,297        | 14.80%      |
| 20.0 to 24.9 percent  | 12,978        | 13.40%      |
| 25.0 to 29.9 percent  | 12,146        | 12.60%      |
| 30.0 to 34.9 percent  | 10,719        | 11.10%      |
| 35.0 percent or more  | 34,446        | 35.60%      |

Table 22 Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates, [www.census.gov](http://www.census.gov)

The 2018 HUD Fair Market Rents and HOME Rent Limits for the Salisbury, MD HUD MSA are shown in the table below.

| # of Bedrooms<br>Limit | High Rent Limit<br>80% of Units | Low Rent Limit<br>20% of Units |
|------------------------|---------------------------------|--------------------------------|
| 0                      | \$921                           | \$723                          |
| 1                      | \$988                           | \$775                          |
| 2                      | \$1,167                         | \$931                          |
| 3                      | \$1,364                         | \$1,075                        |
| 4                      | \$1,501                         | \$1,200                        |
| 5                      | \$1,638                         | \$1,323                        |
| 6                      | \$1,775                         | \$1,447                        |

Table 23 Source: HUD Fair Market Rent, <https://www.hudexchange.info/programs/home/home-rent-limits/>

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD’s Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and Section 8 Income Limits.

The area median rent is estimated at \$1,236, according to the 2018 ACS estimates, which is higher than the 2-bedroom rent limit. The average rents commercially tend to exceed the area median rent and the fair market rent limits. The rental market in Cobb County is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the County.

The National Low Income Housing Coalition’s “Out of Reach” 2019 Annual Report calculates the amount of money a household must earn in order to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD’s affordability standard of paying no more than 30% of income for housing costs. Data is presented in the Renter Affordability table for the Atlanta-Sandy Springs-Marietta Metro Statistical Area (MSA).

As noted in the 2019 Out of Reach Report, the NLIHC estimates that the median income for a renter in the Atlanta-Sandy Springs-Marietta MSA is \$47,442.00. The Area’s Fair Market Rent (FMR) for a two-bedroom apartment is \$1,106 and in order to afford this level of rent and utilities, without paying more than 30% of income on housing. In order to afford a two-bedroom housing unit without spending more than 30 percent of one’s income on rent, one would need to work at a minimum of 117 hours per week or maintain at least 2.4 full-time jobs in Cobb County.

| Number of Households | Georgia   | Cobb County |
|----------------------|-----------|-------------|
| TOTAL                | 3,663,104 | 274,361     |
| RENTER               | 1,356,332 | 97,845      |
| PERCENT RENTERS      | 37%       | 36%         |

| Housing Wage  | Georgia | Cobb County |
|---------------|---------|-------------|
| ZERO-BEDROOM  | \$15.18 | \$18.12     |
| ONE-BEDROOM   | \$15.80 | \$18.58     |
| TWO-BEDROOM   | \$18.42 | \$21.27     |
| THREE-BEDROOM | \$24.19 | \$27.44     |
| FOUR-BEDROOM  | \$29.28 | \$33.69     |

| Fair Market Rent | Georgia | Cobb County |
|------------------|---------|-------------|
| ZERO-BEDROOM     | \$789   | \$942       |
| ONE-BEDROOM      | \$822   | \$966       |
| TWO-BEDROOM      | \$958   | \$1,106     |
| THREE-BEDROOM    | \$1,258 | \$1,427     |
| FOUR-BEDROOM     | \$1,523 | \$1,752     |

| Annual Income Needed to Afford | Georgia  | Cobb County |
|--------------------------------|----------|-------------|
| ZERO-BEDROOM                   | \$31,578 | \$37,680    |
| ONE-BEDROOM                    | \$32,861 | \$38,640    |
| TWO-BEDROOM                    | \$38,319 | \$44,240    |
| THREE-BEDROOM                  | \$50,313 | \$57,080    |
| FOUR-BEDROOM                   | \$60,906 | \$70,080    |

| Work Hours/Week at Minimum Wage | Georgia | Cobb County |
|---------------------------------|---------|-------------|
| ZERO-BEDROOM                    | 84      | 100         |
| ONE-BEDROOM                     | 87      | 102         |
| TWO-BEDROOM                     | 102     | 117         |
| THREE-BEDROOM                   | 133     | 151         |
| FOUR-BEDROOM                    | 162     | 186         |

| Renter Wage                         | Georgia | Cobb County |
|-------------------------------------|---------|-------------|
| ESTIMATED MEAN RENTER WAGE          | \$17.05 | \$18.68     |
| RENT AFFORDABLE AT MEAN RENTER WAGE | \$886   | \$971       |

| Income Levels                            | Georgia  | Cobb County |
|--|----------|-------------|
| 30% OF AREA MEDIAN INCOME (AMI)          | \$20,915 | \$23,910    |
| ESTIMATED RENTER MEDIAN HOUSEHOLD INCOME | \$36,256 | \$47,442    |

Source: National Low Income Housing Coalition, 2019 Out of Reach, <https://reports.nlihc.org/oor/georgia>

## Household Housing Problems

The physical condition of housing units can exacerbate housing affordability problems for low income residents. An examination of housing problems can reveal data related to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens. A household with one or more of these problems is considered to have all of which can be considered as a housing problem. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. An incomplete kitchen facility, as classified by the Census Bureau, is when any of the following are not present: a kitchen sink; a burner cook stove, or microwave oven; and a refrigerator. The term of overcrowding occurs when a housing unit has more than one person per room but less than 1.5 with severe overcrowding occurring with 1.5 persons per room or more. As reflected below, Cobb has less than 1 percent of households that lack plumbing and kitchen facilities.

| <b>SELECTED HOUSING CHARACTERISTICS</b> |                |             |
|---|----------------|-------------|
| <b>Occupied housing units</b>           | <b>283,094</b> | <b>100%</b> |
| Lacking complete plumbing facilities    | 656            | 0.20%       |
| Lacking complete kitchen facilities     | 1,692          | 0.60%       |
| No telephone service available          | 2,440          | 0.90%       |

Table 24. Source: 2018 ACS Estimates, data.census.gov

According to the most recent, 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD, nearly a half of all households (65,600) experience housing problems and just over 14 percent of those households experience severe housing problems. A review of data provides an overall view of the housing needs including number and type of household and those experiencing housing problems including substandard conditions, overcrowding, and cost burdens, for both renters and owners.

### Comprehensive Housing Affordability Strategy

| <b>Housing Problems Overview 1</b>                    | <b>Owner</b>   | <b>Renter</b> | <b>Total</b>   |
|---|----------------|---------------|----------------|
| Household has at least 1 of 4 Housing Problems        | 34,095         | 45,350        | 79,445         |
| Household has none of 4 Housing Problems              | 138,195        | 50,850        | 189,045        |
| Cost burden not available - no other problems         | 1,425          | 2,055         | 3,480          |
| <b>Total</b>  | <b>173,720</b> | <b>98,255</b> | <b>271,975</b> |
| <b>Severe Housing Problems Overview 2</b>             | <b>Owner</b>   | <b>Renter</b> | <b>Total</b>   |
| Household has at least 1 of 4 Severe Housing Problems | 15,270         | 24,395        | 39,665         |
| Household has none of 4 Severe Housing Problems       | 157,020        | 71,810        | 228,830        |
| Cost burden not available - no other problems         | 1,425          | 2,055         | 3,480          |
| <b>Total</b>  | <b>173,720</b> | <b>98,255</b> | <b>271,975</b> |
| <b>Housing Cost Burden Overview 3</b>                 | <b>Owner</b>   | <b>Renter</b> | <b>Total</b>   |
| Cost Burden <=30%                                     | 139,485        | 53,345        | 192,830        |
| Cost Burden >30% to <=50%                             | 18,925         | 22,160        | 41,085         |
| Cost Burden >50%                                      | 13,870         | 20,645        | 34,515         |
| Cost Burden not available                             | 1,445          | 2,105         | 3,550          |
| <b>Total</b>  | <b>173,720</b> | <b>98,255</b> | <b>271,975</b> |

Table 25. Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, <https://www.huduser.gov/portal/datasets/cp.html#2006-2016>

Additional housing problems that were recorded in consultations and citizen comments included handicap accessible housing, availability of senior housing, availability of group homes or communal living arrangement housing, housing density issues, and code compliance for housing. Lower income households and renter households are more likely to be affected by these housing problems.

### Special Housing Needs

According to The U.S. Department of Housing and Urban Development, “special populations” are considered to be the elderly (those over 65 years old) and persons with disabilities. Cobb County identifies residents as senior citizens at 60 years old. A further breakdown of the “Special Housing Needs” profile would include those with mental and physical disabilities and substance abuse concerns.

The total population of disabled persons in Cobb County is estimated to be 65,803 persons which represents 8.89% of the total population of the County. The two largest disability types are cognitive and ambulatory difficulties. The following table includes the 2018 ACS estimates for the number of disabled individuals in Cobb County. Renter households with mobility and self-care limitations are disproportionately affected by housing problems.

**COBB COUNTY DISABILITY CHARACTERISTICS**

|   | Estimate       | With a disability | Percent with a disability |
|---|----------------|-------------------|---------------------------|
| <b>Total civilian noninstitutionalized population</b> | <b>751,353</b> | <b>65,803</b>     | <b>8.80%</b>              |
| <b>SEX</b>  |                |                   |                           |
| Male  | 363,504        | 30,563            | 8.40%                     |
| Female  | 387,849        | 35,240            | 9.10%                     |
| <b>RACE AND HISPANIC OR LATINO ORIGIN</b>             |                |                   |                           |
| White alone   | 434,848        | 41,204            | 9.50%                     |
| Black or African American alone                       | 205,721        | 17,842            | 8.70%                     |
| American Indian and Alaska Native alone               | N              | N                 | N                         |
| Asian alone   | 42,809         | 2,131             | 5.00%                     |
| Native Hawaiian and Other Pacific Islander alone      | N              | N                 | N                         |
| Some other race alone                                 | 39,956         | 2,299             | 5.80%                     |
| Two or more races                                     | 24,700         | 1,691             | 6.80%                     |
| White alone, not Hispanic or Latino                   | 384,753        | 37,932            | 9.90%                     |
| Hispanic or Latino (of any race)                      | 99,434         | 6,241             | 6.30%                     |
| <b>AGE</b>  |                |                   |                           |
| Under 5 years   | 46,770         | 441               | 0.90%                     |
| 5 to 17 years   | 131,241        | 6,478             | 4.90%                     |
| 18 to 34 years  | 176,189        | 9,990             | 5.70%                     |
| 35 to 64 years  | 305,652        | 23,925            | 7.80%                     |
| 65 to 74 years  | 58,187         | 10,799            | 18.60%                    |
| 75 years and over                                     | 33,314         | 14,170            | 42.50%                    |
| <b>DISABILITY TYPE BY DETAILED AGE</b>                |                |                   |                           |
| <b>With a hearing difficulty</b>                      | <b>(X)</b>     | <b>14,902</b>     | <b>2.00%</b>              |
| Population under 18 years                             | 178,011        | 1,232             | 0.70%                     |
| Population under 5 years                              | 46,770         | 350               | 0.70%                     |
| Population 5 to 17 years                              | 131,241        | 882               | 0.70%                     |
| Population 18 to 64 years                             | 481,841        | 3,905             | 0.80%                     |
| Population 18 to 34 years                             | 176,189        | 701               | 0.40%                     |
| Population 35 to 64 years                             | 305,652        | 3,204             | 1.00%                     |
| Population 65 years and over                          | 91,501         | 9,765             | 10.70%                    |
| Population 65 to 74 years                             | 58,187         | 3,335             | 5.70%                     |
| Population 75 years and over                          | 33,314         | 6,430             | 19.30%                    |
| <b>With a vision difficulty</b>                       | <b>(X)</b>     | <b>13,889</b>     | <b>1.80%</b>              |
| Population under 18 years                             | 178,011        | 441               | 0.20%                     |
| Population under 5 years                              | 46,770         | 91                | 0.20%                     |
| Population 5 to 17 years                              | 131,241        | 350               | 0.30%                     |
| Population 18 to 64 years                             | 481,841        | 8,137             | 1.70%                     |
| Population 18 to 34 years                             | 176,189        | 2,033             | 1.20%                     |
| Population 35 to 64 years                             | 305,652        | 6,104             | 2.00%                     |
| Population 65 years and over                          | 91,501         | 5,311             | 5.80%                     |
| Population 65 to 74 years                             | 58,187         | 1,699             | 2.90%                     |
| Population 75 years and over                          | 33,314         | 3,612             | 10.80%                    |
| <b>With a cognitive difficulty</b>                    | <b>(X)</b>     | <b>25,823</b>     | <b>3.70%</b>              |
| Population under 18 years                             | 131,241        | 4,949             | 3.80%                     |
| Population 18 to 64 years                             | 481,841        | 14,884            | 3.10%                     |
| Population 18 to 34 years                             | 176,189        | 6,043             | 3.40%                     |
| Population 35 to 64 years                             | 305,652        | 8,841             | 2.90%                     |
| Population 65 years and over                          | 91,501         | 5,990             | 6.50%                     |
| Population 65 to 74 years                             | 58,187         | 1,446             | 2.50%                     |
| Population 75 years and over                          | 33,314         | 4,544             | 13.60%                    |
| <b>With an ambulatory difficulty</b>                  | <b>(X)</b>     | <b>34,233</b>     | <b>4.90%</b>              |
| Population under 18 years                             | 131,241        | 543               | 0.40%                     |
| Population 18 to 64 years                             | 481,841        | 16,412            | 3.40%                     |
| Population 18 to 34 years                             | 176,189        | 2,530             | 1.40%                     |
| Population 35 to 64 years                             | 305,652        | 13,882            | 4.50%                     |
| Population 65 years and over                          | 91,501         | 17,278            | 18.90%                    |
| Population 65 to 74 years                             | 58,187         | 7,374             | 12.70%                    |
| Population 75 years and over                          | 33,314         | 9,904             | 29.70%                    |
| <b>With a self-care difficulty</b>                    | <b>(X)</b>     | <b>12,035</b>     | <b>1.70%</b>              |
| Population under 18 years                             | 131,241        | 1,059             | 0.80%                     |
| Population 18 to 64 years                             | 481,841        | 5,384             | 1.10%                     |
| Population 18 to 34 years                             | 176,189        | 2,185             | 1.20%                     |
| Population 35 to 64 years                             | 305,652        | 3,199             | 1.00%                     |
| Population 65 years and over                          | 91,501         | 5,592             | 6.10%                     |
| Population 65 to 74 years                             | 58,187         | 1,794             | 3.10%                     |
| Population 75 years and over                          | 33,314         | 3,798             | 11.40%                    |
| <b>With an independent living difficulty</b>          | <b>(X)</b>     | <b>24,185</b>     | <b>4.20%</b>              |
| Population 18 to 64 years                             | 481,841        | 11,924            | 2.50%                     |
| Population 18 to 34 years                             | 176,189        | 3,821             | 2.20%                     |
| Population 35 to 64 years                             | 305,652        | 8,103             | 2.70%                     |
| Population 65 years and over                          | 91,501         | 12,261            | 13.40%                    |
| Population 65 to 74 years                             | 58,187         | 3,441             | 5.90%                     |
| Population 75 years and over                          | 33,314         | 8,820             | 26.50%                    |

Source: US Census, American Community Survey 2018 ACS 1-year estimates, www.data.census.gov

Table 26

## F. Public Housing Authority (PHA) Administrative Plan Review

The Marietta Housing Authority administers the development, rehabilitation or financing of affordable housing programs. The primary mission of the Housing Authority is to provide affordable decent, safe and sanitary housing opportunities to low- and moderate-income families including elderly and handicapped persons, while supporting programs to foster economic self-sufficiency. The Marietta Housing Authority provides quality housing opportunities to clients, while fostering their economic independence, through responsible stewardship of public and private funds.

The Marietta Housing Authority is "*Making Housing Work*" by offering housing programs that lift up the community and set the foundation that empowers families to take charge of their future. We are especially excited about making information available to our current and potential tenants and landlords via this website. The Marietta Housing Authority administers the HUD Housing Choice Voucher program in Cobb County.

The subsidized Housing Choice Voucher rental assistance program enables Cobb to provide affordable housing options for very low-income households. A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. Rental units are required to meet HUD minimum housing standards, as determined by the public housing agency [PHA]. In many cases the housing subsidy is paid directly to the landlord by the PHA on behalf of the participating family. The family will then pay the difference between the actual rent charged by the landlord and the amount subsidized by the program each month. Under certain circumstances, if authorized by the PHA, a family may use its voucher to purchase a modest home. Since the demand for housing assistance often exceeds the limited resources available local housing authorities, long waiting list periods are common. The waiting lists range on average from 20 to 39 months.

As of 2019, there were 6,749 families enrolled in the housing assistance program funded through Housing Choice Voucher Program from HUD with only a total of 2,727 subsidized units available. According to HUD's 2019 Picture of Subsidized Households, a total of the average household income per year was \$15,612. The chart below reflects the demographics of population.

### Cobb County Housing Choice Voucher Inventory Report

| DESCRIPTION                                 | DATA     |
|---|----------|
| Subsidized units available                  | 2,727    |
| Number of people: total                     | 6749     |
| % Occupied                                  | 98%      |
| % Disabled                                  | 18%      |
| % Minority                                  | 91%      |
| % Black                                     | 87%      |
| % Hispanic                                  | 3%       |
| % in poverty Census Tract                   | 68%      |
| Average HUD Expenditure per month (\$\$)    | 825      |
| Average Family Expenditure per month (\$\$) | 412      |
| Household income per year                   | \$15,612 |
| Average months on waiting list              | 21       |

Table 27. Source: HUD Picture of Subsidized Households for 2019, <https://www.huduser.gov/PORTAL/datasets/assths.html>

Other subsidized housing options within the County, include low income housing tax credit multifamily developments. According to HUD’s Low Income Housing Tax Credit [LIHTC] database, the County has 1,548 low income units located throughout the County. The following is a listing of LIHTC properties.

### Cobb County Low Income Tax Credit Housing

| HUD ID Number: | Project Name:                              | Project Address:               | Project City:  | Project State: | Project ZIP Code: | Total Number of Units: | Total Low-Income Units: | HOME Program Funds | Annual LIHTC Allocation Amount: |
|----------------|--|--------------------------------|----------------|----------------|-------------------|------------------------|-------------------------|--------------------|---------------------------------|
| GAA19919002    | FARRINGTON                                 | 2751 HAMMONDTON RD SE          | MARIETTA       | GA             | 30060-5342        | 257                    | 0                       | No                 |                                 |
| GAA19950125    | GREGORY LANE APTS PHASE I                  | 466 GREGORY LN                 | ACWORTH        | GA             | 30102             | 72                     | 72                      | No                 |                                 |
| GAA19950130    | GREGORY LANE APARTMENTS, PHASE II          | 465 GREGORY LN                 | ACWORTH        | GA             | 30102-7530        | 40                     | 38                      | No                 |                                 |
| GAA19950340    | ROSEWOOD PARK APARTMENT                    | 2199 MESA VALLEY WAY           | AUSTELL        | GA             | 30106-8135        | 150                    | 150                     | No                 |                                 |
| GAA20030257    | THE PEAKS AT BELLS FERRY                   | 100 PEAKS RDG                  | ACWORTH        | GA             | 30102-1953        | 248                    | 148                     | No                 | \$499,278                       |
| GAA20030300    | WALTON RESERVE APARTMENTS                  | 7075 WALTON RESERVE LN         | AUSTELL        | GA             | 30168-2504        | 249                    | 249                     | No                 | \$635,961                       |
| GAA19960120    | HARMONY MEADOWS APARTMENTS                 | 1910 S COBB DR SE              | MARIETTA       | GA             | 30060-4951        | 186                    | 184                     | No                 |                                 |
| GAA19970032    | CRESTWOOD PARK                             | 925 GRESHAM AVE NE             | MARIETTA       | GA             | 30060             | 60                     | 60                      | No                 | \$356,695                       |
| GAA19980157    | WINGATE FALLS                              | 4801 BAKER GROVE RD NW         | ACWORTH        | GA             | 30101-6323        | 192                    | 0                       | No                 |                                 |
| GAA20020130    | CONCORD CROSSING                           | 2935 OLD CONCORD RD SE         | SMYRNA         | GA             | 30082-2310        | 190                    | 0                       | No                 |                                 |
| GAA20000055    | ORCHARD LANE APARTMENTS                    | 6862 MABLETON PKWY SE          | MABLETON       | GA             | 30126-6400        | 135                    | 0                       | No                 |                                 |
| GAA20010155    | CHEROKEE SUMMIT                            | 5920 BELLS FERRY RD            | ACWORTH        | GA             | 30102-1411        | 272                    | 0                       | No                 |                                 |
| GAA20030065    | HIGHLAND COURT SR RESIDENCE                | 4150 GEORGE BUSBEE PKWY NW     | KENNESAW       | GA             | 30144             | 122                    | 94                      | No                 | \$61,238                        |
| GAA20030802    | COBBLESTONE LANDING                        | 3050 COBB PKWY NW              | KENNESAW       | GA             | 30152-6542        | 172                    | 0                       | No                 | \$188,920                       |
| GAA20050315    | WALTON RIDENOUR APARTMENTS                 | 1425 RIDENOUR BLVD NW          | KENNESAW       | GA             | 30152-4567        | 260                    | 234                     | No                 | \$652,937                       |
| GAA20050115    | ALTA RIDENOUR SR APARTMENTS                | 1350 RIDENOUR BLVD NW          | KENNESAW       | GA             | 30152             | 252                    |                         | No                 | \$595,505                       |
| GAA20050130    | ASHTON ARBORS APARTMENTS                   | 2780 BANKSTONE DR SW           | MARIETTA       | GA             | 30064-4368        | 150                    | 0                       | No                 | \$369,815                       |
| GAA20050155    | CASWYCK TRAIL APARTMENTS                   | 2665 FAVOR RD SW               | MARIETTA       | GA             | 30060-5237        | 403                    | 0                       | No                 |                                 |
| GAA20039030    | HIGHLAND COURT                             | 4150 GEORGE BUSBEE PKWY NW     | KENNESAW       | GA             | 30144-0800        | 122                    | 0                       | No                 | \$61,238                        |
| GAA20040150    | THE HERITAGE AT WALTON RESERVE             | 1675 WALTON RESERVE BLVD       | AUSTELL        | GA             | 30168-2537        | 105                    | 0                       | No                 | \$508,531                       |
| GAA20050215    | LAKESIDE VISTA APARTMENTS                  | 2100 ELLISON LAKES DR NW       | KENNESAW       | GA             | 30152-6732        | 62                     | 0                       | No                 | \$597,445                       |
| GAA20050240    | ORCHARD MILL APTS                          | 1800 MULKEY RD                 | AUSTELL        | GA             | 30106             | 238                    | 232                     | No                 | \$670,214                       |
| GAA20080057    | HIGHLAND RIDGE                             | 1899 MULKEY RD                 | AUSTELL        | GA             | 30106-1120        | 108                    | 0                       | No                 | \$210,530                       |
| GAA20059029    | LEGACY AT WALTON CROSSING FKA ORCHARD MILL | 1800 MULKEY RD                 | AUSTELL        | GA             | 30106-1119        | 232                    | 0                       | No                 |                                 |
| GAA20060325    | COBBLESTONE APARTMENTS                     | 347 PAT MELL ROAD              | MARIETTA       | GA             | 30060             | 244                    | 0                       | No                 |                                 |
| GAA20060420    | WALTON VILLAGE APARTMENTS                  | 160 ROBERTA DRIVE              | MARIETTA       | GA             | 30008             | 208                    | 0                       | No                 |                                 |
| GAA20070122    | PARKLAND MANOR APARTMENTS                  | 3755 MEDICAL PARK DR           | AUSTELL        | GA             | 30106-6826        | 150                    | 0                       | No                 |                                 |
| GAA20070155    | LEGACY AT WALTON VILLAGE PHASE I           | 1400 ROBERTA DR SW             | MARIETTA       | GA             | 30008             | 126                    | 87                      | Yes                | \$750,000                       |
| GAA20079031    | LEGACY AT WALTON VILLAGE                   | 1400 ROBERTA DR SW             | MARIETTA       | GA             | 30008-3896        | 126                    | 0                       | No                 | \$777,742                       |
| GAA20120115    | LEGACY AT WALTON TERRACE                   | 4598 CARRUTH ST                | ACWORTH        | GA             | 30101-5105        | 108                    | 0                       | Yes                | \$890,213                       |
| GAA20090110    | RETREAT AT DORSEY MANOR                    | 118 HAYNES ST NE               | MARIETTA       | GA             | 30060-1957        | 72                     | 0                       | Yes                |                                 |
| GAA20110055    | GALLERIA MANOR OF SMYRNA                   | 2731 WOODLAND TER SE           | SMYRNA         | GA             | 30080-2607        | 88                     | 0                       | No                 |                                 |
| GAA20110075    | LEGACY AT WALTON VILLAGE PHASE II          | 1400 ROBERTA DR SW             | MARIETTA       | GA             | 30008             | 78                     | 0                       | No                 | \$950                           |
| GAA20110145    | TOWER AT DORSEY MANOR                      | 212 LEMON ST NE                | MARIETTA       | GA             | 30060-1645        | 81                     | 0                       | Yes                | \$26,995                        |
| GAA20116015    | LEGACY AT WALTON VILLAGE PHASE 2           | 1570 ROBERTA DR SW             | MARIETTA       | GA             | 30008-3804        | 78                     | 0                       | No                 | \$950                           |
| GAA20160102    | ABBINGTON TRAIL                            | 3500 TRILLIUM DIRVE            | POWDER SPRINGS | GA             | 30127             | 60                     | 0                       | No                 | \$715,542                       |
| GAA20160109    | LEGACY AT WALTON PARK FKA SCHOOL STRT DEV  | MIRANDA SANDERS 4862 SCHOOL ST | ACWORTH        | GA             | 30101-4964        | 100                    | 0                       | No                 | \$777,000                       |
| <b>TOTAL</b>   |  |                                |                |                |                   | <b>5,796</b>           | <b>1,548</b>            |                    | <b>\$9,347,699</b>              |

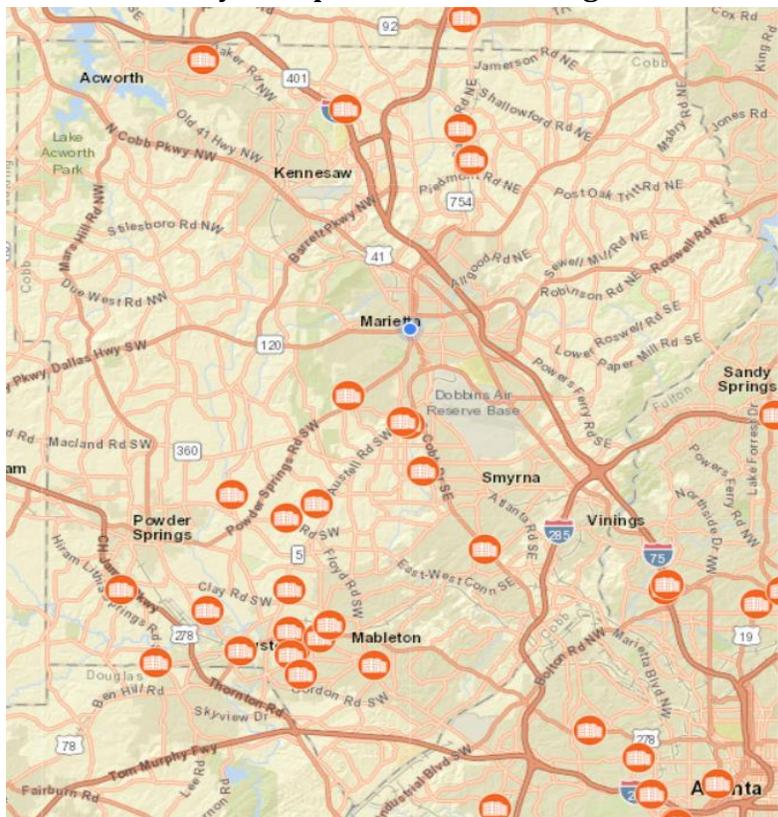
Table 28 Source: Source: HUD Low-Income Housing Tax Credit Database. <http://lihtc.huduser.org>

## Persons with Disabilities & Elderly

Aging residents are more likely to have needs related to accommodations for disabilities. As a protected class, persons with disabilities have a right to fair housing choice, yet the housing needs of this population can diverge significantly from the needs of other groups. People with mobility impairments are likely to need housing with features that improve accessibility and facilitate maneuverability within the unit, (i.e. first floor units, elevators, ramps, floor level bathrooms tubs. etc.) Persons with visual and hearing deficiencies may need housing accommodations for service animals, alternative types of fire and smoke alarms, alternative phone services, communications in braille, etc.

Based on HUD's Resource Locator for affordable housing for elderly and special needs persons, the County has more than 20 multi-family housing units that have dedicated units for elderly and special needs populations. This inventory database is designed to assist prospective applicants with locating units in HUD insured and HUD subsidized multifamily properties that serve the elderly and/or persons with disabilities. These units tend to offer rental assistance and housing credit programs funded through federally funded programs. Below is a listing of units for elderly and disabled residents in Cobb County.

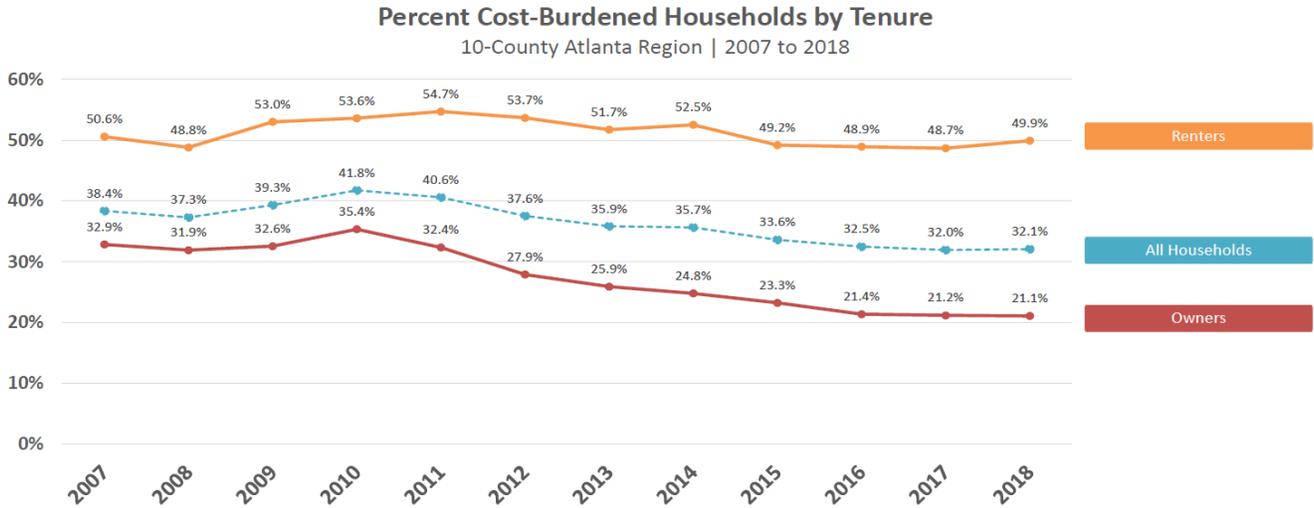
### Affordable Elderly and Special Needs Housing in Cobb County



Source: HUD Resource Locator, <https://resources.hud.gov/#>

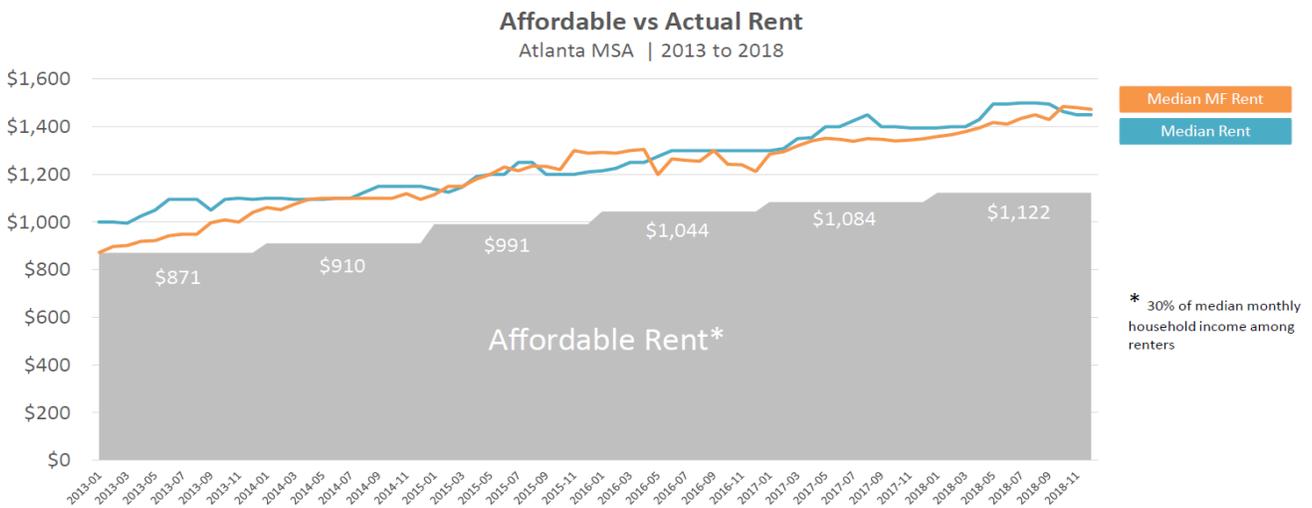
## Regional Housing Crisis

According to the Atlanta Regional Commission’s Regional Snapshot: 2020 Regional Housing Affordability, the number of renter households in the Metro Atlanta region are consistently paying more than 30% of their income on housing costs which has increased in the last 10 years, while the number of cost-burdened owner households has declined. Additionally, the Report indicates the overwhelming majority of lower income households in the region are cost-burdened with the greatest increase is cost-burdened households with annual incomes between \$35,000 and \$50,000.



Source: Atlanta Regional Commission, Regional Snapshot: 2020 Regional Housing Affordability, <https://33n.atlantaregional.com/regional-snapshot/regional-snapshot-2020-regional-housing-affordability>

Rent in the region is increasing more quickly than household incomes among renters, leading to a growing gap in the rents being paid and what would be considered affordable. The quickest increase in rent has been for multifamily units.



Source: Atlanta Regional Commission, Regional Snapshot: 2020 Regional Housing Affordability, <https://33n.atlantaregional.com/regional-snapshot/regional-snapshot-2020-regional-housing-affordability>

## G. Segregation & Integration

The history of housing segregation is marked by implicit and explicit forms of social and spatial discrimination including redlining, segregation, and disparities in lending. The result of these practices around the country was the enactment of the Fair Housing Act in 1968, which was designed to address inequality in mortgage lending and homeownership and curb explicit discriminatory practices by landlords who avoided renting to minorities. Since the enactment of the FHA, progress has been made, but patterns of segregation and housing discrimination remain major impediments to social and economic mobility for those identified as protected classes. This chapter explores segregation and integration patterns in Cobb County using federal and local data to understand segregation and its impact on Cobb residents.

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

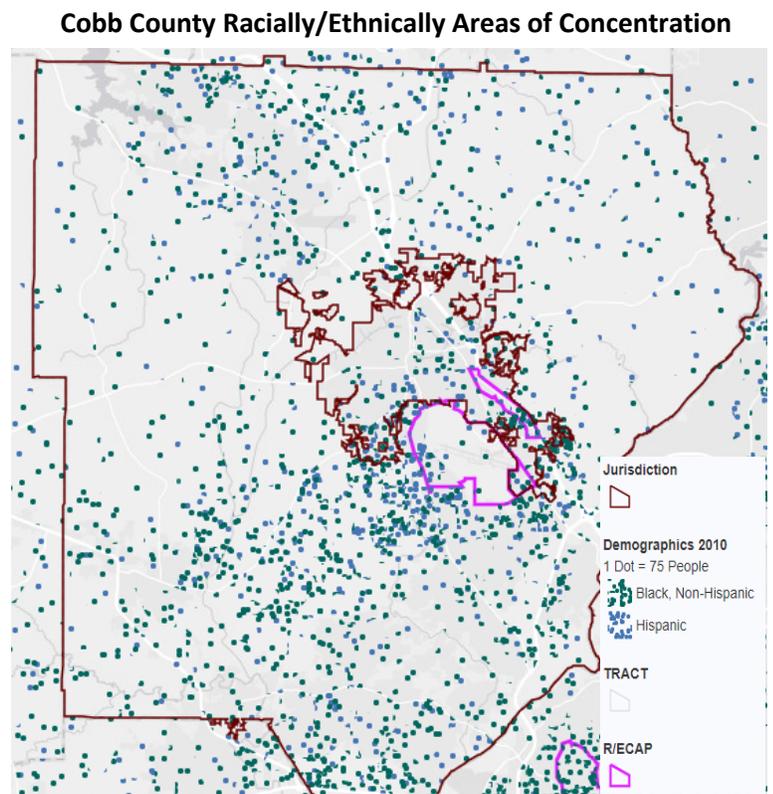
The U.S. Department of Housing and Urban Development (HUD) defines Racially and Ethnically Concentrated Areas of poverty (R/ECAPs) with a racial/ethnic concentration threshold and a poverty test of a census tract. A R/ECAP area is a census tract that has a non-white population of 50 percent or more and where 40 percent or more of individuals live at or below the poverty line. To reflect regional and neighborhood differences across the county, an area is also considered a R/ECAP if the poverty rate exceeds 40 percent or is three or more times the average census tract poverty rate for the area, whichever is lower.<sup>1</sup>

### Location of R/ECAPS

In 2019 there were three R/ECAP areas in Cobb County, which has increased since 2010 when there were no R/ECAP areas. An increase in R/ECAP areas represents more concentrated areas of poverty and fewer opportunities for communities of color living below the poverty threshold. The location of R/ECAP areas in Cobb are shown in the figure.

### R/ECAP Demographics

Based on data released by HUD in 2019, 10,456 persons lived in R/ECAP areas in Cobb County. As shown in the table below, R/ECAP areas primarily comprise of Hispanic persons who represent 47.57 percent of the population. The next largest populations in R/ECAP areas include Black, Non-Hispanic residents who comprise 32.14 percent and White, Non-Hispanic residents, who comprise 17.15 percent. All other racial groups each comprise less than 1 percent of residents in R/ECAP areas.



Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

<sup>1</sup> Department of Housing and Urban Development, 2020. Available at: [https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e\\_0](https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_0)

| <b>R/ECAP Demographics, Cobb County</b> |                               |                |                               |                |                               |                |
|---|-------------------------------|----------------|-------------------------------|----------------|-------------------------------|----------------|
|   | <b>Census Tract<br/>31001</b> |                | <b>Census Tract<br/>31113</b> |                | <b>Census Tract<br/>30411</b> |                |
| <b>R/ECAP Race/Ethnicity</b>            | <b>Estimate</b>               | <b>Percent</b> | <b>Estimate</b>               | <b>Percent</b> | <b>Estimate</b>               | <b>Percent</b> |
| <b>Total Population</b>                 | <b>5,215</b>                  | <b>X</b>       | <b>1027</b>                   | <b>X</b>       | <b>4214</b>                   | <b>X</b>       |
| White, Non-Hispanic                     | 1,336                         | 0.78%          | 149                           | 14.51%         | 309                           | 8.09%          |
| Black, Non-Hispanic                     | 1,013                         | 59.18%         | 484                           | 47.13%         | 1,864                         | 44.51%         |
| Hispanic                                | 2,725                         | 52.25%         | 349                           | 33.98%         | 1900                          | 44.26%         |
| Asian or Pacific Islander, Non-Hispanic | 26                            | 1.67%          | 19                            | 1.85%          | 43                            | 3.01%          |
| Native American, Non-Hispanic           | 13                            | 0.87%          | 6                             | 0.58%          | 6                             | 0.16%          |
| Other, Non-Hispanic                     | 17                            | 0.82%          | 5                             | 0.49%          | 14                            | 1.00%          |

Table 29 Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

A majority of the population in the Cobb County R/ECAP areas are born in the United States, with few residents whose national origin is outside the United States. Out of the total R/ECAP population, 1,540 persons or 29 percent have an origin outside of the U.S. Persons originating from Mexico, however, had the highest proportion of persons whose origin was outside the U.S with 1,284 persons.

| <b>Country of Origin for persons in R/ECAP Areas, Cobb County</b> |                              |                 |                |
|---|------------------------------|-----------------|----------------|
|   | <b>Country of Origin</b>     | <b>Estimate</b> | <b>Percent</b> |
| <b>Total Foreign-Born Population</b>                              |                              | <b>5,215</b>    | <b>X</b>       |
| National Origin, #1 Most Populous                                 | <b>Mexico</b>                | 1,284           | <b>24.62%</b>  |
| National Origin, #2 Most Populous                                 | <b>India</b>                 | 0               | <b>0%</b>      |
| National Origin, #3 Most Populous                                 | <b>Other Central America</b> | 196             | <b>3.76%</b>   |
| National Origin, #4 Most Populous                                 | <b>Western Africa</b>        | 0               | <b>0%</b>      |
| National Origin, #5 Most Populous                                 | <b>Other Caribbean</b>       | 60              | <b>1.15%</b>   |

Table 30. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### III. ACCESS TO OPPORTUNITY

Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services and amenities, which are critical factors to consider when measuring fair housing choice. This section provides an overview of federal and local data sources and stakeholder and community feedback to examine access to opportunity for Cobb’s protected classes. This section will discuss access to education, affordable transportation, employment opportunities, environmental health, housing quality, exposure to lead-based paint, and broadband access. Measuring these opportunity factors provides insight into communities’ quality of life and informs fair housing needs for protected classes.

#### Overview of HUD-Defined Opportunity Factors

HUD developed opportunity indicators to identify communities with disparate access to opportunity and identify protected classes experiencing disparate impacts of unfair housing choice. The opportunity index includes scores for: poverty, education, employment, transportation and environmental health. The following sections provide definitions of each opportunity indicator as defined in HUD’s AFFH-T Data Documentation and describe local findings. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity<sup>2</sup>.

#### Low Poverty Index

The Low Poverty Index measures poverty in a community, a higher score represents a more prosperous community with lower levels of poverty. This indicator measures rates of family poverty and the receipt of public assistance, such as cash welfare. The table below shows Poverty Index scores across race and ethnicity. In this table, we see that in general, the Hispanic community and the Black Non-Hispanic Community are the least prosperous and experience the most poverty, while the White Non-Hispanic and Asian or Pacific Islander Non-Hispanic Communities are the most prosperous and experience the least poverty in the County as well as the Atlanta MSA Region.

| Low Poverty Index                            |                 |  |
|--|-----------------|--|
|  | Cobb County, GA | (Atlanta-Sandy Springs-Roswell, GA) Region |
| <b>Total Population</b>                      | %               | %  |
| White, Non-Hispanic                          | 73.45           | 59.85                                      |
| Black, Non-Hispanic                          | 50.75           | 37.89                                      |
| Hispanic                                     | 44.88           | 39.43                                      |
| Asian or Pacific Islander, Non-Hispanic      | 70.88           | 58.62                                      |
| Native American, Non-Hispanic                | 61.64           | 48.35                                      |
| <b>Population below federal poverty line</b> |                 |  |
| White, Non-Hispanic                          | 63.54           | 49.05                                      |
| Black, Non-Hispanic                          | 40.29           | 28.04                                      |
| Hispanic                                     | 34.71           | 30.85                                      |
| Asian or Pacific Islander, Non-Hispanic      | 68.89           | 49.35                                      |
| Native American, Non-Hispanic                | 46.87           | 38.77                                      |

Table 31. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

<sup>2</sup> Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation, <https://egis.hud.gov/affht/>

### School Proficiency Index

The School Proficiency Index measures the quality of the school systems in a community. The higher the score, the higher the school system met HUD’s definition of proficiency. This indicator uses school-level data on the performance of 4th-grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools.

The table shows School Proficiency Index scores across race and ethnicity. In this table, we see that the Asian or Pacific Islander Non-Hispanic and White Non-Hispanic and Native American Communities have the most access to quality schools even when in poverty, While the Hispanic and Black Non-Hispanic communities have the least access to quality schools in the County. The same characteristics exist for the Atlanta MSA Region in which the Hispanic and Black Non-Hispanic communities have the least access to quality schools.

| School Proficiency Index by Race/Ethnicity   |                 |  |
|--|-----------------|--|
|  | Cobb County, GA | (Atlanta-Sandy Springs-Roswell, GA) Region |
| <b>Total Population</b>                      | %               | %  |
| White, Non-Hispanic                          | 77.03           | 69.77                                      |
| Black, Non-Hispanic                          | 52.59           | 40.02                                      |
| Hispanic                                     | 51.32           | 54.38                                      |
| Asian or Pacific Islander, Non-Hispanic      | 74.91           | 68.79                                      |
| Native American, Non-Hispanic                | 65.50           | 57.20                                      |
| <b>Population below federal poverty line</b> |                 |  |
| White, Non-Hispanic                          | 68.74           | 61.59                                      |
| Black, Non-Hispanic                          | 45.62           | 36.05                                      |
| Hispanic                                     | 47.36           | 48.57                                      |
| Asian or Pacific Islander, Non-Hispanic      | 77.68           | 59.78                                      |
| Native American, Non-Hispanic                | 71.15           | 47.66                                      |

Table 32. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Labor Market Engagement Index

The Labor Market Engagement Index measures a community’s level of employment, labor force participation, and educational attainment in a community, the higher the score, the higher the opportunity for engagement in the labor market. The table below shows the Labor Market Engagement Index scores across race and ethnicity. In the table below, Asian or Pacific Islander Non-Hispanic and White Non-Hispanic and Hispanic communities have the most labor market engagement even when in poverty, While the Native American Non-Hispanic and Black Non-Hispanic communities have the least Labor market engagement. Comparatively, in the Atlanta MSA Regions, Black Non-Hispanic, Hispanic and Native Americans have the least labor market engagement.

| <b>Labor Market Index</b>                    |                        |   |
|--|------------------------|---|
|  | <b>Cobb County, GA</b> | <b>(Atlanta-Sandy Springs-Roswell, GA) Region</b> |
| <b>Total Population</b>                      | <b>%</b>               | <b>%</b>  |
| White, Non-Hispanic                          | 77.85                  | 61.92   |
| Black, Non-Hispanic                          | 62.16                  | 42.07   |
| Hispanic                                     | 57.82                  | 52.79   |
| Asian or Pacific Islander, Non-Hispanic      | 79.82                  | 67.06   |
| Native American, Non-Hispanic                | 70.57                  | 52.19   |
| <b>Population below federal poverty line</b> |                        |   |
| White, Non-Hispanic                          | 70.42                  | 50.74   |
| Black, Non-Hispanic                          | 56.33                  | 34.68   |
| Hispanic                                     | 53.03                  | 47.54   |
| Asian or Pacific Islander, Non-Hispanic      | 80.73                  | 60.41   |
| Native American, Non-Hispanic                | 47.52                  | 44.07   |

Table 33. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Transit Index

The Transit Index measures the utilization of public transportation in a community. Transit access describes the accessibility of amenities using public transit. The higher the score, the more likely residents in that community utilize public transit. This indicator estimates transit trips taken by families that: are a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)).

Table 32 shows the Transit Index scores across race and ethnicity. Based on these parameters, transit use is consistent across racial and ethnic communities with the Asian Pacific Islander Non-Hispanic community below the poverty with the highest score, while, regionally Asian Pacific Islander Non-Hispanic, Black and Hispanic communities have the highest score.

| Transit Index                                |                 |  |
|--|-----------------|--|
|  | Cobb County, GA | (Atlanta-Sandy Springs-Roswell, GA) Region |
| <b>Total Population</b>                      | %               | %  |
| White, Non-Hispanic                          | 58.92           | 48.79                                      |
| Black, Non-Hispanic                          | 62.04           | 56.34                                      |
| Hispanic                                     | 63.29           | 60.15                                      |
| Asian or Pacific Islander, Non-Hispanic      | 64.94           | 61.48                                      |
| Native American, Non-Hispanic                | 61.47           | 51.37                                      |
| <b>Population below federal poverty line</b> |                 |  |
| White, Non-Hispanic                          | 61.16           | 47.67                                      |
| Black, Non-Hispanic                          | 65.34           | 61.47                                      |
| Hispanic                                     | 67.53           | 63.28                                      |
| Asian or Pacific Islander, Non-Hispanic      | 65.41           | 66.10                                      |
| Native American, Non-Hispanic                | 49.70           | 53.35                                      |

Table 34. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Low Transportation Cost Index

The Low Transportation Cost Index estimates transportation costs for families that: are a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., MSA). The table below shows the Low Transportation Cost Index scores across race and ethnicity. In this table, we see that the White and Native American Non-Hispanic communities have the lowest transit costs, this trend is similar to the MSA region for low transit costs.

| Low Transportation Cost Index                |                 |  |
|--|-----------------|--|
|  | Cobb County, GA | (Atlanta-Sandy Springs-Roswell, GA) Region |
| <b>Total Population</b>                      |                 |  |
| White, Non-Hispanic                          | 45.61           | 44.83                                      |
| Black, Non-Hispanic                          | 55.09           | 52.30                                      |
| Hispanic                                     | 55.87           | 56.16                                      |
| Asian or Pacific Islander, Non-Hispanic      | 52.01           | 53.17                                      |
| Native American, Non-Hispanic                | 51.88           | 48.65                                      |
| <b>Population below federal poverty line</b> |                 |  |
| White, Non-Hispanic                          | 53.18           | 47.66                                      |
| Black, Non-Hispanic                          | 59.31           | 57.21                                      |
| Hispanic                                     | 60.81           | 59.98                                      |
| Asian or Pacific Islander, Non-Hispanic      | 51.99           | 59.62                                      |
| Native American, Non-Hispanic                | 42.94           | 52.24                                      |

Table 35. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Jobs Proximity Index

The Jobs Proximity Index measures the distance of job locations from a community. Greater weight is given to larger employment centers. The competition for a job location measured by labor supply is inversely weighted. Table 33 shows the Jobs Proximity Index scores across race and ethnicity. In this table, we see that the Asian or Pacific Islander community lives closest to where they work, followed by the Hispanic and White Non-Hispanic communities in both Cobb County and the Atlanta MSA region.

| Jobs Proximity Index                         |                 |  |
|--|-----------------|--|
|  | Cobb County, GA | (Atlanta-Sandy Springs-Roswell, GA) Region |
| <b>Total Population</b>                      | %               | %  |
| White, Non-Hispanic                          | 48.23           | 41.85                                      |
| Black, Non-Hispanic                          | 53.32           | 43.44                                      |
| Hispanic                                     | 54.35           | 54.48                                      |
| Asian or Pacific Islander, Non-Hispanic      | 57.97           | 57.55                                      |
| Native American, Non-Hispanic                | 53.28           | 42.84                                      |
| <b>Population below federal poverty line</b> |                 |  |
| White, Non-Hispanic                          | 53.88           | 42.01                                      |
| Black, Non-Hispanic                          | 56.88           | 49.47                                      |
| Hispanic                                     | 56.42           | 58.58                                      |
| Asian or Pacific Islander, Non-Hispanic      | 60.14           | 63.00                                      |
| Native American, Non-Hispanic                | 37.48           | 47.18                                      |

Table 36. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Environmental Health Index

The environmental health index measures the environmental quality of a community. The higher the score, the less exposure a community has to harmful environmental toxins. The index measures the potential for exposure to harmful toxins within a community, as determined by the Environmental Protection Agency’s Toxic Release Inventory by volume and toxicity.

Table 34 shows Environmental Health Index scores for Cobb communities, across race, ethnicity, and poverty. In this table, we see that the Hispanic community has the greatest exposure to environmental toxins. For communities below the federal poverty level, the Native American, Non-Hispanic community below the poverty line has the least exposure to environmental toxins, while the Asian Pacific Islander Non-Hispanic community below the poverty line has the most risk of exposure to environmental toxins.

| Environmental Health Index                   |                 |  |
|--|-----------------|--|
|  | Cobb County, GA | (Atlanta-Sandy Springs-Roswell, GA) Region |
| <b>Total Population</b>                      | %               | %  |
| White, Non-Hispanic                          | 15.70           | 20.45                                      |
| Black, Non-Hispanic                          | 13.92           | 14.17                                      |
| Hispanic                                     | 13.99           | 15.89                                      |
| Asian or Pacific Islander, Non-Hispanic      | 13.77           | 16.32                                      |
| Native American, Non-Hispanic                | 14.41           | 18.24                                      |
| <b>Population below federal poverty line</b> |                 |  |
| White, Non-Hispanic                          | 14.47           | 20.41                                      |
| Black, Non-Hispanic                          | 13.25           | 12.65                                      |
| Hispanic                                     | 13.37           | 14.74                                      |
| Asian or Pacific Islander, Non-Hispanic      | 13.78           | 13.90                                      |
| Native American, Non-Hispanic                | 18.08           | 16.17                                      |

Table 37. Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

Looking at the indices overall, White, Non-Hispanic population tends to live in more prosperous communities, have access to higher-quality schools, and have the most labor market engagement. Native American Non-Hispanic community and the Black Non-Hispanic community are the least prosperous, have the least access to quality schools, and the lowest labor market engagement. The Asian Pacific Islander population has the highest transit access score, have the lowest transportation costs, live closest to their jobs, but are most at risk of exposure to environmental toxins. Hispanic communities tend to live close to where they work and have low transit and transportation costs and are at high risk of environmental toxin exposure.

Understanding the disproportionality of opportunity access within White, Non-Hispanic communities compared to minority communities will help inform the location of housing that is accessible to minority communities, to ensure they are also given access to housing within higher opportunity neighborhoods.

#### IV. LOCAL OPPORTUNITY FACTORS

In addition to the Access to Opportunity Indices provided by HUD. Data provided by the ACS and HUD Comprehensive Housing Affordability Strategy (CHAS) provides insight into the conditions of Communities and Housing. The following analysis examines employment, education, broadband access, transportation, environmental justice, and disproportionate housing.

##### Unemployment

Household income is a determining factor of where people can afford to live and the quality of housing conditions they can afford to have. Quality jobs provide access to sufficient household income and improve housing choice. The tables below show employment status over time and by gender and race/ethnicity. Employment status is assessed for the population over 16 years and over. Persons in the age group of 16 to 64 years who are seeking employment or currently working are considered to be participating in the labor force. An individual who is not actively seeking a job is not considered to be participating in the labor force and thus is not part of the unemployment calculation.

Cobb County’s unemployment rate decreased from 11.3 percent in 2010 to 3.7 percent in 2018. However, labor force participation also decreased from 72.2 percent in 2010 to 70.8 percent in 2018. The employed population increased by less than one percent during that time.

| <b>Employment Status, Cobb County, 2010 and 2018</b> |             |             |
|--|-------------|-------------|
|  | <b>2010</b> | <b>2018</b> |
| Population 16 years and over                         | 532,341     | 601,280     |
| In labor force                                       | 72.20%      | 70.80%      |
| Employed   | 63.90%      | 60.80%      |
| Unemployed   | 11.30%      | 3.70%       |

Table 38. Source: U.S. Census Bureau, 2018 American Community Survey, [www.census.gov](http://www.census.gov)

The rate of unemployment across gender is equal at 3.3 percent, but the data shows significant disparities between racial and ethnic groups. The Black or African American and White communities’ experiences significantly higher rates of unemployment than other racial and ethnic communities.

| 2018 Unemployment Rate                     |       |
|--|-------|
| Male                                       | 3.30% |
| Female                                     | 3.30% |
| White                                      | 3.50% |
| Black or African American                  | 4.80% |
| American Indian and Alaska Native          | N     |
| Asian                                      | 1.70% |
| Native Hawaiian and Other Pacific Islander | N     |
| Some other race                            | N     |
| Two or more races                          | N     |
| Hispanic or Latino origin (of any race)    | 2.40% |

Table 39. Source: U.S. Census Bureau, 2018 American Community Survey, [www.census.gov](http://www.census.gov)

### Occupation by Industry

In addition to employment patterns, a closer look at where residents work helps to assess overall access to economic opportunity. Educational Services, Professional Scientific, and Management, and Administrative and Waste Management Services comprises 37 percent of the employed population over 16, the largest share of jobs in the County. This is followed by Retail Trade at 10.9 percent and Arts, entertainment, and recreation, and accommodation and food services at 10.3 percent.

| Occupations by Industry, Cobb County, 2018   |          |         |
|--|----------|---------|
|  | Estimate | Percent |
| Agriculture, forestry, fishing and hunting, and mining                                     | 464      | 0.10%   |
| Construction   | 27,949   | 6.80%   |
| Manufacturing  | 32,695   | 8.00%   |
| Wholesale trade  | 9,972    | 2.40%   |
| Retail trade   | 44,547   | 10.90%  |
| Transportation and warehousing, and utilities  | 23,884   | 5.80%   |
| Information  | 13,513   | 3.30%   |
| Finance and insurance, and real estate and rental and leasing                              | 34,108   | 8.30%   |
| Professional, scientific, and management, and administrative and waste management services | 74,024   | 18.10%  |
| Educational services, and health care and social assistance                                | 74,905   | 18.30%  |
| Arts, entertainment, and recreation, and accommodation and food services                   | 43,229   | 10.60%  |
| Other services, except public administration   | 14,926   | 3.70%   |
| Public administration  | 14,534   | 3.60%   |

Table 40. Source: U.S. Census Bureau, 2018 American Community Survey, [www.census.gov](http://www.census.gov)

## Minimum Wage

The current minimum wage in the Cobb County is \$7.25 per hour. Based on MIT's Living Wage Calculator, Cobb County's minimum wage is \$6.41 below the \$6.88 living wage for one adult with no children and \$17.55 below the living wage for two working adults with one child, within the Atlanta metropolitan region. A living wage is an hourly rate that an individual in a household must earn to support himself or herself and their family.

According to MIT, the living wage shown is the hourly rate that an individual in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year).<sup>3</sup>

|              | 1 ADULT    |         |            |            | 2 ADULTS (BOTH WORKING) |         |            |            |
|--------------|------------|---------|------------|------------|-------------------------|---------|------------|------------|
|              | 0 Children | 1 Child | 2 Children | 3 Children | 0 Children              | 1 Child | 2 Children | 3 Children |
| Living Wage  | \$13.66    | \$25.61 | \$29.56    | \$35.79    | \$10.28                 | \$14.13 | \$16.08    | \$18.59    |
| Poverty Wage | \$6.00     | \$8.13  | \$10.25    | \$12.38    | \$4.06                  | \$5.13  | \$6.19     | \$7.25     |
| Minimum Wage | \$7.25     | \$7.25  | \$7.25     | \$7.25     | \$7.25                  | \$7.25  | \$7.25     | \$7.25     |

Considering these large gaps between minimum and living wages, households with adults earning minimum wage would need additional assistance in securing housing in Cobb County.

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<sup>3</sup> Living Wage Calculation for Cobb County, Georgia <https://livingwage.mit.edu/counties/13067>

## Educational Attainment

Educational attainment is a key factor in future wages and economic opportunities. 18.6 percent of Cobb's population has a high school education, 25.7 percent have some college, but no degree, and 31 percent have a bachelor's degree, which is far better than the state.

| Educational Attainment, Cobb County, 2018   |                 |         |                  |         |
|---|-----------------|---------|------------------|---------|
|   | Cobb County, GA |         | State of Georgia |         |
|   | Estimate        | Percent | Estimate         | Percent |
| Population 25 years and over                | 511,231         | X       | 6,978,172        | X       |
| Less than high school diploma               | 34,252          | 6.70%   | 865,293          | 12.40%  |
| High school graduate (includes equivalency) | 95,089          | 18.60%  | 1,939,932        | 27.80%  |
| Some college or associate's degree          | 131,386         | 25.70%  | 1,946,910        | 27.90%  |
| Bachelor's degree                           | 158,482         | 31.00%  | 1,360,744        | 19.50%  |
| Graduate or professional degree             | 92,022          | 18.00%  | 858,315          | 12.30%  |
| High school graduate or higher              | 476,979         | 93.30%  | 6,112,879        | 87.60%  |
| Male, high school graduate or higher        | 443,113         | 92.90%  | 6,029,141        | 86.40%  |
| Female, high school graduate or higher      | 478,512         | 93.60%  | 6,189,639        | 88.70%  |
| Bachelor's degree or higher                 | 251,014         | 49.10%  | 2,226,037        | 31.90%  |
| Male, bachelor's degree or higher           | 251,014         | 49.10%  | 2,149,277        | 30.80%  |
| Female, bachelor's degree or higher         | 250,503         | 49.00%  | 2,288,840        | 32.80%  |

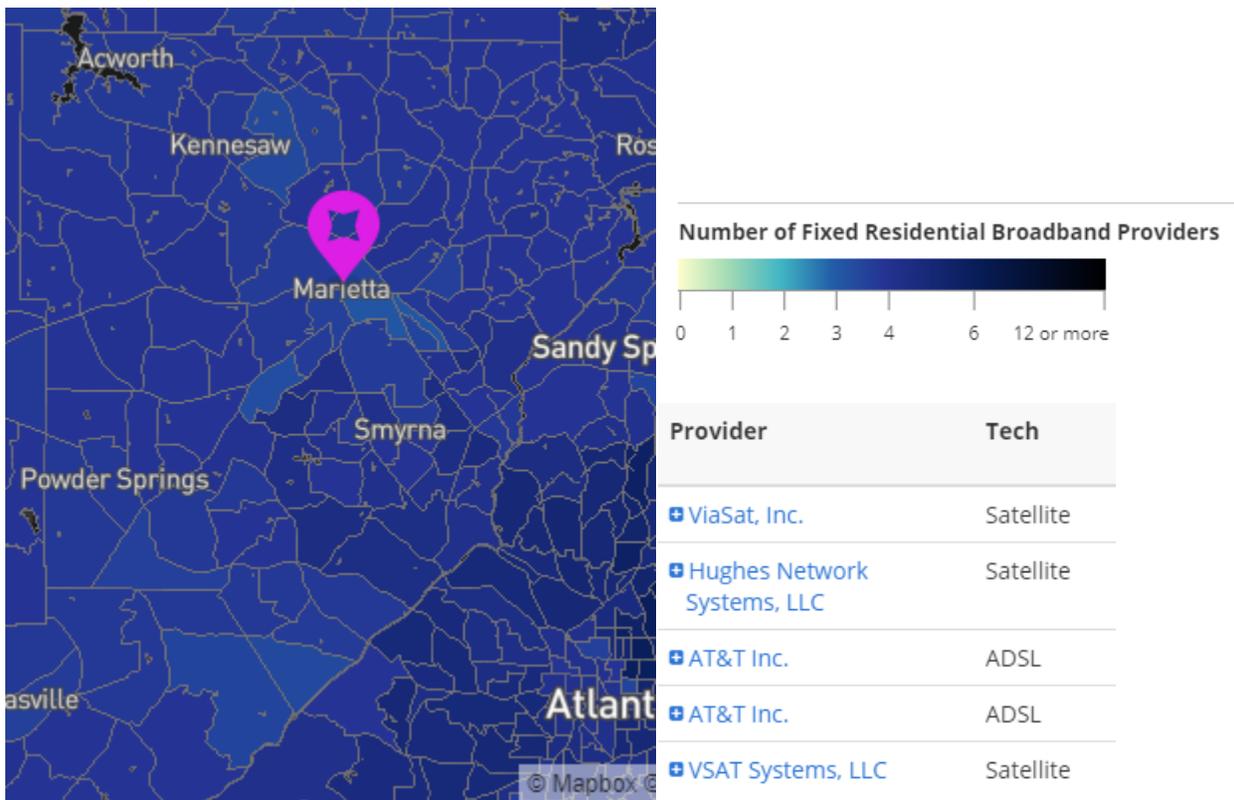
Table 41. Source: U.S. Census Bureau, 2018 American Community Survey, [www.census.gov](http://www.census.gov)

## Broadband Access

Throughout the United States, there is a significant digital divide; a gap between those who have ready access to the internet and computers and those who do not. The divide is perpetuated by limitations that are geographical as well as financial, where persons cannot afford to pay a monthly service fee for Broadband service (an internet connection fast enough to stream a video). Nationwide, less than half of households living on or under \$20,000 are connected. This lack of internet access in communities supports a deficit in opportunity, education, and other prospects.<sup>4</sup>

The figure below shows the number of fixed broadband providers. While the figure shows the number of providers available, it does not reflect the household level usage of broadband. From a fair housing perspective, ensuring that residential broadband is available to housing projects both within and in the outskirts of the city will support community viability and improve the quality of life for residents.

<sup>4</sup> Vick, Karl. March 2017. The Digital Divide: A Quarter of the Nation is Without Broadband. Time. Available at: <https://time.com/4718032/the-digital-divide/>



Source: Federal Communications Commission (FCC) Fixed Broadband Deployment, 2020, <https://broadbandmap.fcc.gov/>

### Environmental Justice and Health

Historically environmentally hazardous sites have been disproportionately placed in communities of color, leading to exposure to hazardous materials and a higher risk of health problems. Siting of these dangerous environmental sites corresponds with housing segregation and zoning, placing high intensity uses near areas zoned multifamily or redlined communities. Environmental Justice and fair housing advocacy both seek to address racial segregation, disparities in access to political power, municipal fragmentation, boundary-drawing around resources, disinvestment, and administrative silos.<sup>5</sup>

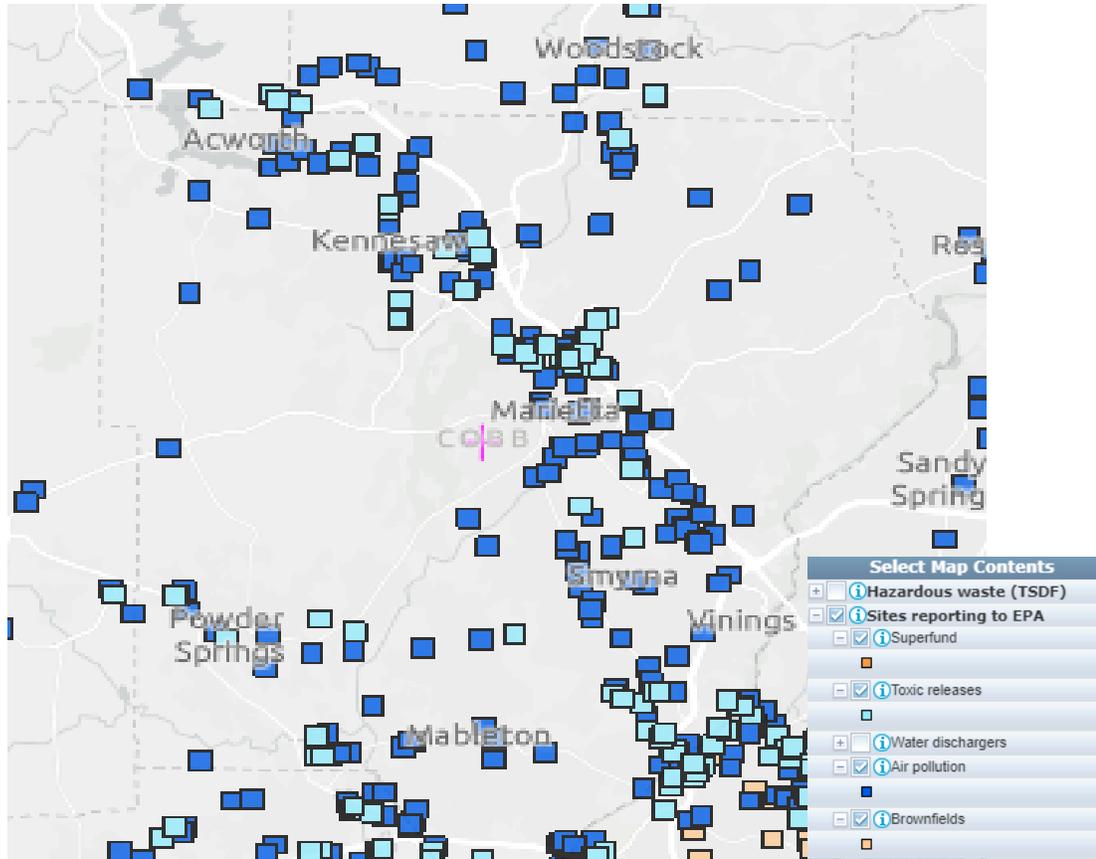
The figure on the following page displays the location of sites that report to the U.S. Environmental Protection Agency (EPA). These sites include superfund sites- uncontrolled hazardous waste sites, toxic release sites- toxic chemical releases and waste management activities, air pollution sites- stationary sources of air pollution, and brownfields- previously developed land that is known or potentially contaminated. Extended exposure to these sites can cause a variety of harmful effects on human health and the environment.

Cobb County has a high concentration of sites reporting to EPA throughout the County. Concentrations of air pollution and toxic release sites are particularly high in the northeastern and southern region of the county.

<sup>5</sup> Haberle, Megan. 2017. Fair Housing and Environmental Justice: New Strategies and Challenges. Journal of Affordable Housing, Volume 26, Number 2.

These sites coincide with concentrations of communities of color, especially Black, Non-Hispanic populations, as well as concentrations of public housing and Project-based Section 8 housing described in later sections of this assessment.

### Sites that Report to EPA in Cobb County



Source: Environmental Protection Agency Environmental Justice Screening and Mapping Tool, <https://ejscreen.epa.gov/mapper/>

Based on this data, meaningful advances need to take place around the location of publicly assisted housing and enforcing environmental justice regulations to provide communities with safe environments in which to live.

## IV. ANALYSIS OF PUBLIC POLICY IMPEDIMENTS

### General Plan Land Use Element

Since 1968, the Fair Housing Act has prohibited explicit and implicit discriminatory practices through land use policies, building codes, public services, and other public and private practices, such as conditional or special use permits and real estate broker steering, that limit access to fair housing choice for members of protected classes.<sup>6</sup> Though examples and effects of such practices vary from jurisdiction to jurisdiction, in general, public and private policies should aim to further fair housing goals and proactively address potentially discriminatory practices and trends.

Zoning ordinances and land use regulations are designed to regulate the development and use of property, in some cases, the promotion or preservation of other factors, such as community character, site and location of services, housing typology, and the overall planning process, may deter fair housing choice by limiting housing choice and access to protected classes.<sup>7</sup> The following sections examine critical public and private policy areas and their potential impact on fair housing choice in Cobb County.

Land use policies are fundamental to ensuring housing opportunities. Any land use policies that do not promote a variety of housing opportunities can impede housing choice. The General Plan Land Use Element is a long-term land use policy that determines the type, amount, location and density of land uses within the County—except those portions of the County that fall within the boundaries of an incorporated city—in a manner prescribed by State Planning Law. The Land Use Element is the blueprint for the growth and development of the area.

The Land Use Element provides a wide range of land use designations that include residential uses as shown in the figure below. The building intensities and densities allowable within the range of land use designations provide for a wide range of housing opportunities throughout the county suitable to accommodate households of all incomes. In addition to the County's Comprehensive Plan, each of the incorporated cities within the County have adopted General Plans with land use elements specific to the unique character of each community and making it possible to create a range of housing opportunities.

Over the past few decades, Cobb County has transformed from a bedroom community into more of a regional employment center. This evolution is expected to continue as more jobs locate within Cobb's regional employment centers, such as the Cumberland and Town Center areas, leveraging opportunities created through the construction of SunTrust Park and The Battery Atlanta.

Cobb County's land use patterns are dominated by established residential areas in the east, developing residential areas in the west, and redevelopment potential in the central and south. Commercial uses are concentrated major thoroughfares and at major centers, such as Town Center and Cumberland. Industrial uses have assembled along the interstates; the largest concentration of industrial uses is in the southern tip of the County adjacent to I-20. Cobb allows for mixed-use and

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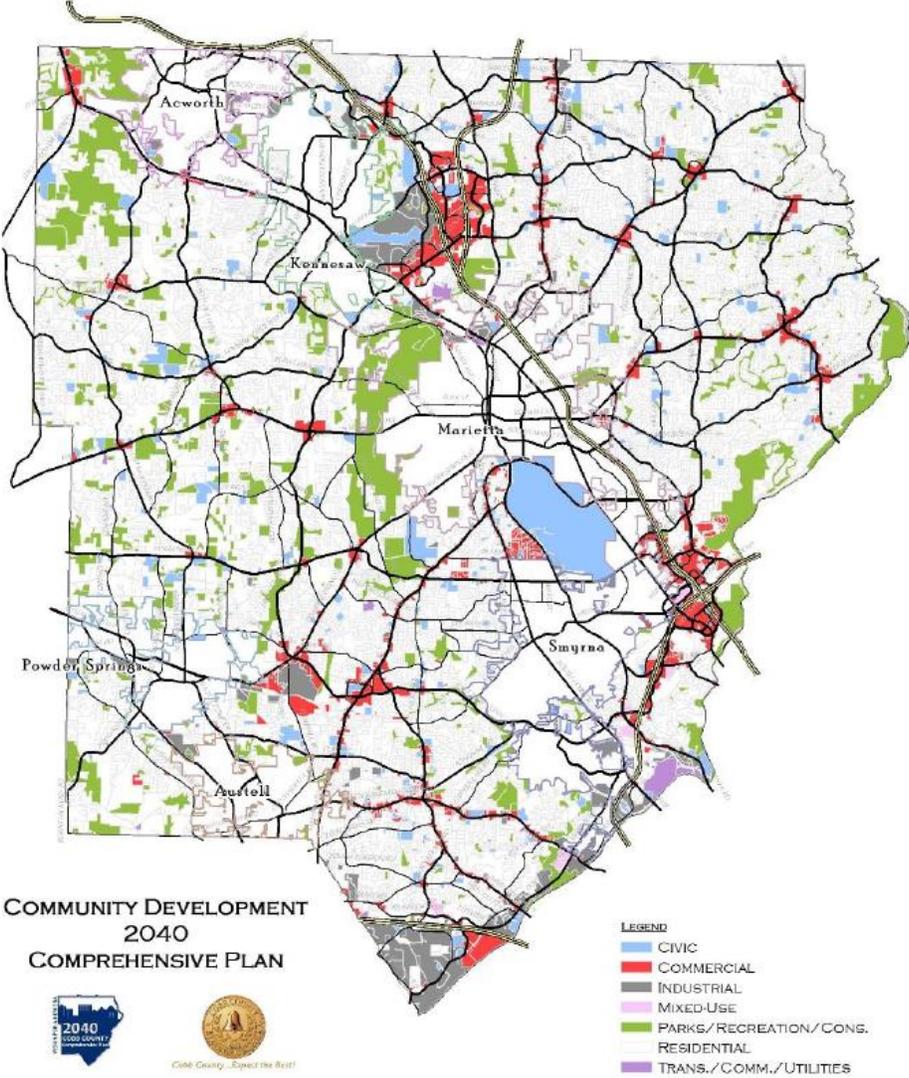
<sup>6</sup> HUD, History of Fair Housing. Available at: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/aboutfheo/history](https://www.hud.gov/program_offices/fair_housing_equal_opp/aboutfheo/history)

<sup>7</sup> Knapp, Gerrit et al. "Zoning as a Barrier to Multifamily Housing Development." American Planning Association. 2007. Available at: [https://www.huduser.gov/Publications/pdf/zoning\\_MultifmlyDev.pdf](https://www.huduser.gov/Publications/pdf/zoning_MultifmlyDev.pdf)

denser development in certain nodes, mostly within the regional centers of Cumberland and Town Center.

Cobb County encourages the redevelopment of underutilized commercial properties over the next 25 years. This will assist in conserving land resources and will help stabilize and preserve other less-intense areas of the County. The revitalization and redevelopment of underperforming residential areas will result in a halo effect with new investment along the County's aging commercial corridors. These types of investments are influenced by factors such as local demographics, the cost and availability of land, and the business climate of the jurisdiction.

### EXISTING LAND USE



## Comprehensive Plan Land Use Designations for Housing

According to the County’s Comprehensive Plan, residential structures should be designed and built to ensure intensity and density compatibility with adjacent single-family detached dwellings. The building intensities and densities allowable within the range of land use designations provide for a wide range of housing opportunities throughout the county suitable to accommodate households of all incomes. In addition to the County’s Comprehensive Plan, each of the incorporated cities within the County have adopted Comprehensive Plans with land use elements specific to the unique character of each community and making it possible to create a range of housing opportunities.

| Land Use Designation | Description  | Notes   |
|----------------------|--|---|
| R-80                 | Single-family residential, 80,000-square-foot lot size | R-80 district is established to provide locations for single-family residential uses or residentially compatible institutional and recreational uses.                               |
| RR                   | Rural Residential                                      | The RR district is established to provide locations for large useable areas for limited residential, agricultural, park and open space needs.                                       |
| R-40                 | Single-family residential, 40,000-square-foot lot size | The R-40 district is established to provide locations for single-family residential uses or residentially compatible institutional and recreational uses.                           |
| R-30                 | Single-family residential, 30,000-square-foot lot size | The R-30 district is established to provide locations for single-family residential uses or residentially compatible institutional and recreational uses.                           |
| R-20                 | Single-family residential, 20,000-square-foot lot size | The R-20 district is established to provide locations for single-family residential uses or residentially compatible institutional and recreational uses.                           |
| R-15                 | Single-family residential, 15,000-square-foot lot size | The R-15 district is established to provide locations for single-family residential uses or residentially compatible institutional and recreational uses.                           |
| R-12                 | Single-family residential, 12,000-square-foot lot size | The R-12 district is established to provide locations for single-family detached residential uses or residentially compatible institutional and recreational uses.                  |
| RD                   | Residential duplex                                     | RD district is established to provide locations for the development of affordable single-family detached or attached owner-occupied residential dwelling units, including duplexes. |

Table 42. Cobb County Zoning, [www.cobbcounty.org](http://www.cobbcounty.org)

| Land Use Designation | Description                                  | Notes   |
|----------------------|--|---|
| RA-4                 | Single-family attached/detached residential  | RA-4 district is established to provide locations for the development of single-family detached or attached residential dwelling units including the combination of duplexes, triplexes and quadruplexes.   |
| RA-5                 | Single-family attached/detached residential  | A-5 district is established to provide locations for the development of affordable single-family detached or attached residential dwelling units, including the combination of duplexes, triplexes and quadruplexes.  |
| SC                   | Suburban condominium residential district)   | SC district is established to provide locations for the development of low maintenance residential condominium dwelling units, including the combination of single-family houses, duplexes, triplexes and quadruplexes.   |
| RA-6                 | Single-family attached/detached residential) | The RA-6 district is established to provide locations for the development of single-family detached or attached residential dwelling units including the combination of duplexes, triplexes and quadruplexes.   |
| RM-8                 | Residential multifamily                      | The RM-8 district is established to provide locations for multifamily residential uses or residentially compatible institutional and recreational uses which are within properties delineated for medium and high density residential and regional activity center.   |
| FST                  | Fee simple townhouse residential)            | FST district is established to provide locations for affordable attached residential dwelling units (six, eight or ten units per acre) or residentially compatible institutional and recreational uses which are within or on the edge of properties delineated for any medium or high density residential. |
| RM-12                | Residential multifamily                      | RM-12 district is established to provide locations for multifamily residential uses or residentially compatible institutional and recreational uses which are within properties delineated for high density residential and regional activity center.   |
| RM-16                | Multifamily residential                      | The RM-16 district is established to provide locations for multifamily residential uses or residentially compatible institutional and recreational uses which are within regional activity center.  |
| MHP/S                | Mobile home park/subdivision                 | MHP/S district is established to provide for the subdivision of property into individually owned lots on which a trailer or mobile home may be located.   |

Table 43. Cobb County Zoning, [www.cobbcounty.org](http://www.cobbcounty.org)

## Zoning Ordinance & Building Codes

The County’s Ordinance No. 134-1 provides the Land Use Planning and Zoning Regulations for the unincorporated County. The Ordinance provides for land use designations, general plan amendment procedures, zoning classifications, zoning districts (including permitted uses, development standards and other regulatory considerations), and general provisions. The Ordinance contains key definitions of terms that have the potential to impact fair housing choice. An evaluation of these definitions is contained within the Fair Housing Impediment Study summarized in the table below:

**Fair Housing Impediment Study**

| Type of Impediment<br>“Practice or Regulatory” | Compliance<br>Yes or No<br>Compliance | Evaluation<br>Description   | Jurisdiction Practice  | Comments  |
|--|---------------------------------------|---|--|---|
| Regulatory                                     | Yes                                   | Definition of<br>“Family”   | Family means two or more persons related by blood, legal adoption, or marriage, occupying a dwelling.  | County definition complies with State law and does not discriminate based on the individual characteristics of the person or persons living in the dwelling unit. |
| Practice                                       | yes                                   | Single Housekeeping Unit - Group Home- (as related to the definition of “Family”) | Dwelling shared by four or fewer persons, excluding resident staff, who live together as a single housekeeping unit and in a long term, family-like environment in which staff persons provide care, education and participation in community activities for the residents with the primary goal of enabling the residents to live as independently as possible in order to reach their maximum potential under the direction and guidance of a designated managing caregiver, who must be a resident of the group home. | County definition complies with State law and does not discriminate based on the individual characteristics of the person or persons living in the dwelling unit. |

Table 44. Cobb County Zoning, [www.cobbcounty.org](http://www.cobbcounty.org)

| Type of Impediment "Practice or Regulatory" | Compliance Yes or No Compliance | Evaluation Description   | Jurisdiction Practice  | Comments  |
|---|---------------------------------|--|--|---|
| Regulatory                                  | Yes                             | Definition of a "disability"   | Handicapped person means a person who, by reason of illness, injury, age, congenital malfunction, or other incapacity or disability, has a significant loss or impairment of mobility. | County uses "Disability" definition set forth in State Codes.   |
| Practice                                    | Yes                             | Personal Characteristics of residents considered?                            | County does not regulate or consider residents personal characteristics.   | County provides equal access to housing for special needs residents such as the homeless, elderly, and disabled.  |
| Practice                                    | Yes                             | On-site supporting services permitted?                                       | County does not prohibit on-site supportive services in connection with housing.   | County encourages services needed by residents.   |
| Regulatory                                  | Yes                             | Restrict number of unrelated persons residing together if they are disabled? | The County definitions of Health Facilities provide for a range of living situations for disabled persons.   | County complies with State law.   |
| Regulatory                                  | Yes                             | Zoning for Fair Housing  | County's Comprehensive Plan promotes Fair Housing; Zoning Ordinance does not conflict with that policy.  | County General Plan requires compliance with all Fair Housing laws and policies. Among the first provisions is the County's Reasonable Accommodation procedure. |
| Regulatory                                  | Yes                             | Senior Housing Restrictions & Federal Law                                    | County permits multi-family senior housing in accordance with zoning standards.  | Senior Housing means multiple-family dwelling units, each of which is occupied by one resident who is required to be at least 55 years of age.                  |
| Regulatory                                  | Yes                             | Allow ADA Modifications in municipal-supplied or managed housing?            | County complies with State law. County encourages ADA access modifications.  | County complies with State law. County encourages ADA access modifications.   |

Table 45. Cobb County Zoning, www.cobbcounty.org

Based on the fair housing impediment study conducted of the Comprehensive Plan Housing Element, Land Use Element and Zoning Ordinance, one impediments to fair housing choice relative to siting and standards for transitional and supportive housing is identified.

State housing law requires that cities facilitate and encourage the provision of housing for a full range of economic segments of the community and special needs groups. Local government policies that limit or exclude housing for persons with disabilities, lower income people, people who are homeless, families with children, or other groups may violate the Fair Housing Act. Municipalities must take these factors into account when regulating land use and development standards throughout its residential zones. The Housing Element of the Plan includes a constraints analysis that examines potential constraints to the development of affordable housing. Key elements of analysis include where certain uses are allowable within the community and development standards.

***Single Family***

Single-family residences are permitted by right or allowed in 10 zones. This includes both conventional one family dwellings and manufactured housing.

***Multi-Family***

Multiple-family residential developments are permitted by right in three zones.

***Condominium***

Condominiums are permitted by right in one zone.

***Manufactured Housing***

State law requires the County to permit manufactured housing and mobile homes on lots for single-family dwellings provided that the manufactured home meets the location and design criteria established in the Zoning Ordinance.

***Mobile Home Parks***

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a conditional use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development. In compliance with State law, the County conditionally permits mobile home parks in two zones.

The County's Comprehensive Plan appears to be in compliance with the federal regulations governing fair housing. The County uses provisions in their Annexation Agreements that require Owners/Developers to pay development assessments to the County on a per lot basis for re-investments in existing neighborhoods and contributions to housing affordability. The development assessments are used by the County in its sole discretion for beautification, restoration, and revitalization improvements to existing neighborhoods and for the promotion of addressing the County's workforce/affordable housing needs and implementation of a workforce housing program. In reviewing the County's Zoning Ordinance, it is recommended that there is a need to add information, definitions and provisions concerning Fair Housing.

It is recommended that the County include language in the Zoning Ordinance stating the County's commitment to affirmatively further fair housing through its land use regulations and public policies, such as zoning, to promote fair housing choice for all residents in the County. The statement should include mention of the Fair Housing Act of 1968, the Americans with Disabilities Act of 1990, as well as identification of the federal protected classes.

The County's Zoning Ordinance does not appear to contain any specific discriminatory language; however, the definitions should be reviewed and consideration should be given to revising the definition of family, as well as including additional definitions.

The County should consider including the following definitions: "Fair Housing Act", "Americans with Disabilities Act", "Handicap", and "Reasonable Accommodation." The Zoning Ordinance defines "Family" as, "Up to a maximum of two or more persons who are not so related." Definitions that have a limit of two unrelated adults may be considered discriminatory as the limitation may have an adverse impact on minorities or people with disabilities.

The Federal Courts have ruled that four to six persons with a disability living together in a single-family residence, should be considered a "family" and thereby be permitted to live together as a family in any zoning district that permits residential uses.

The County should consider adopting a written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing Act. A reasonable accommodation policy would allow the County flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

### ***Building Codes***

The Cobb County uses the following building codes:

- International Building Code, 2018 Edition, with Georgia Amendments (2020)
- International Residential Code, 2018 Edition, with Georgia Amendments (2020)
- International Fire Code, 2018 Edition (No Georgia Amendments)
- International Plumbing Code, 2018 Edition, with Georgia Amendments (2020)
- International Mechanical Code, 2018 Edition, with Georgia Amendments (2020)
- International Fuel Gas Code, 2018 Edition, with Georgia Amendments (2020)
- National Electrical Code, 2017 Edition (No Georgia Amendments)
- International Energy Conservation Code, 2015 Edition, with Georgia Supplements and Amendments (2020)

The International Building Code (new construction) and the International Existing Building Code (renovation/rehabilitation) are model codes and are in compliance with the federal laws and regulations governing fair housing and accessibility.

Building inspections are administered by the County's Community Development Department, Permitting and Inspections. The Building Codes are enforced through plan review and inspections.

### ***Accessibility Regulations***

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" includes the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. "Visitable" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have at least a 32-inch clear opening. As a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons. Cobb County appears to be in full compliance with the HUD visitability standards.

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "Section 504" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications dwellings and common use areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars; and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

## **Home Mortgage Disclosure Act (HMDA)**

Homeownership provides a path towards building wealth and gaining long-term housing stability. At the same time, low-income households and protected classes continue to lack access to fair lending opportunities or lag behind in the economic benefits associated with homeownership due to the lingering effects of historic lending practices and policies that systematically excluded members of protected classes from homeownership opportunities. The following section analyzes current lending patterns within Cobb County and the greater metropolitan area to assess overall access to home lending for protected classes to identify potential barriers to fair housing.

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings; the provision of brokerage services; or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, and national origin.

To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford, including equal access to homeownership opportunities. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which the housing needs of Cobb County residents are being met by home loan lenders.

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at [www.ffiec.gov/hmda/](http://www.ffiec.gov/hmda/). The most recent HMDA Data is that of 2019, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Atlanta-Sandy Spring-Roswell Metropolitan Statistical Area (MSA). The MSA includes the following areas: Barrow County, GA; Bartow County, GA; Carroll County, GA; Cherokee County, GA; Clayton County, GA; Cobb County, GA; Coweta County, GA; Dawson County, GA; DeKalb County, GA; Douglas County, GA; Fayette County, GA; Forsyth County, GA; Fulton County, GA; Gwinnett County, GA; Heard County, GA; Henry County, GA; Jasper County, GA; Newton County, GA; Paulding County, GA; Pickens County, GA; Pike County, GA; Rockdale County, GA; Spalding County, GA; and Walton County, GA.

Home lending patterns are established using the latest available data from the Home Mortgage Disclosure Act (HMDA) for the Atlanta Metropolitan Statistical Area (MSA) 2007 to 2019, with an emphasis on information available from 2019. The MSA is the smallest available geographic unit in the 2019 HMDA dataset, which also provides a broader understanding of the regional lending trends occurring in the Atlanta Metro area. The following section analyzes current lending patterns within Cobb County and the greater metropolitan area to assess overall access to home lending for protected classes to identify potential barriers to fair housing.

## **Loan Origination, Type, and Purpose**

Mortgage originations in Cobb vary from year to year. From 2017 to 2019, there was an average of 7,689 originations per year with a total of 23,068 in the span of the three years. Although there are no clear trends

in the data provided in the table below, growing concerns with lackluster housing production and the tightening of lending and credit standards, as expressed by local developers through focus groups and conversations, in recent years have led to some market uncertainty in the region. Nonetheless, mortgage brokers expect lending to pick up as cuts in the federal interest rates take effect.

**All Originated Mortgages, Cobb County, 2017-2019**

| Year         | All originated mortgages | % Change from Previous Year |
|--------------|--------------------------|-----------------------------|
| 2017         | 5474                     | X                           |
| 2018         | 8946                     | +63.42                      |
| 2019         | 8648                     | -3.33                       |
| <b>TOTAL</b> | <b>23,068</b>            |                             |

Table 46. Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

During 2017-2019, 50 percent of all lending activity in Cobb County was in the form of conventional loans, which are private loans that are not backed by a governmental entity. Nationally, conventional loans comprise 75 percent of all lending activity.<sup>8</sup> A smaller percentage of conventional loans in Cobb County may signal market gaps in the local private lending market and possibly indicate a lack of savings and income for residents in Cobb County. This is further supported by higher rates of FHA loans, 23.6 percent, which are mortgages issued by lenders approved by the Federal Housing Administration (FHA) and insured by the FHA. These loans have lower down payment requirements and other underwriting criteria that make them more accessible to borrowers with limited assets or lower credit scores.<sup>9</sup> Based on HMDA data, nationwide FHA loans represented 23 percent of all mortgage lending activity.

**Loans Purchased by Type of Loan & Amount, Cobb County, 2017-2019**

| Loan Type              | # of Records     | \$ Amount              | Percent of Total |
|------------------------|------------------|------------------------|------------------|
| FHA                    | 5,395            | \$781,217,212          | 23.6%            |
| Conventional           | 476,324          | \$1,685,277,934        | 50.8%            |
| Refinancing            | 784,513          | \$829,781,748          | 25.0%            |
| Home Improvement Loans | 370,705          | \$18,795,606           | 0.6%             |
| <b>TOTALS</b>          | <b>1,636,937</b> | <b>\$3,315,072,500</b> | <b>100%</b>      |

Table 47. Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

A market that relies more heavily on conventional loans is an indicator of a healthy lending and real estate market, as borrowers and lenders opt for more conventional loans. However, a shift from government-backed mortgages may also signal a narrowing of options for borrowers from protected classes that have been historically left out of the private mortgage market and homeownership. In the case of Cobb County, data indicates that there is a fairly balanced market that responds to the financial need of all borrowers in the area. In addition to home purchase loans, cash-out or refinancing products were key components of the local lending market. Approximately 25 percent of the lending activity was for refinancing or cash-out purposes while home improvement loans were about 6 percent.

<sup>8</sup> Conventional Loans,” Consumer Financial Protection Bureau. Available at: <https://www.consumerfinance.gov/owning-a-home/loan-options/conventional-loans/>

<sup>9</sup> Let FHA Help You,” U.S. Department of Housing and Urban Development. Available at: <https://www.hud.gov/buying/loans>

Based on the 2019 HMDA data, which relies on self-reporting, most loans were given to Non-Hispanic Whites in the Atlanta MSA. White borrowers were 57 percent of all loans. The 2019 data supports Cobb County’s previous Analysis of Impediments, which identified that many communities of color face challenges in entering the home lending market in the jurisdiction. As described in the table below, Black or African American borrowers and co-borrowers represented only 22 percent of the home lending activity of the Atlanta MSA.

Such discrepancies highlight a disparity in access to capital for communities of color in the Atlanta Metro area, limiting access to homeownership, and in turn long-term wealth and stability. It is worth noting, Asian households represent about 7 percent of the lending activity in the area. Moreover, since the derived variable provided by HMDA combines borrower and co-borrower characteristics, about 1 percent of loans reported as “Joint” where the borrower and co-borrower stood for a combination of White and non-White races that could not be classified under one of the other race categories.

**Disposition of Loan Applications, by Race of Applicant, 2019  
Atlanta--Athens-Clarke County--Sandy Springs, GA-AL**

| <b>Race (Not Hispanic or Latino)</b>      | <b># of Loan Originated</b> | <b>Percent of Loans</b> | <b>Total Amount</b>     |
|---|-----------------------------|-------------------------|-------------------------|
| American Indian or Alaska Native          | 445                         | 0.24%                   | \$98,325,000            |
| Asian                                     | 12,963                      | 7.06%                   | \$3,478,735,000         |
| Black or African American                 | 40,671                      | 22.16%                  | \$8,415,145,000         |
| Native Hawaiian or Other Pacific Islander | 297                         | 0.16%                   | \$59,935,000            |
| White                                     | 105,748                     | 57.62%                  | \$26,087,290,000        |
| 2 or more minority races                  | 395                         | 0.22%                   | \$80,555,000            |
| Sex Not Available                         | 2,461                       | 1.34%                   | \$695,705,000           |
| Free Form Text Only                       | 23                          | 0.01%                   | \$3,375,000             |
| Race Not Available                        | 20,515                      | 11.18%                  | \$10,406,855,000        |
| <b>TOTALS</b>                             | <b>183,518</b>              |                         | <b>\$49,325,920,000</b> |

Table 48 Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

Though not at the levels of Black or African American borrowers, Hispanic or Latino borrowers were also underrepresented in the home lending activity of the area in 2019. As the table below highlights, Hispanic or Latinos borrowers were only about 5 percent of all lending activity of the area. Moreover, the totals loan amount for Hispanic or Latino borrowers was significantly lower than the total loan amounts for Non-Hispanic or Latino borrowers.

**Disposition of Loan Applications, by Ethnicity of Applicant, 2019  
Atlanta--Athens-Clarke County--Sandy Springs, GA-AL**

| <b>Ethnicity</b>        | <b># of Loan Originated</b> | <b>Percent of Loans</b> | <b>Total Amount</b>     |
|-------------------------|-----------------------------|-------------------------|-------------------------|
| Hispanic or Latino      | \$10,762                    | 5.41%                   | \$2,214,450,000         |
| Not Hispanic or Latino  | \$149,603                   | 75.24%                  | \$35,990,435,000        |
| Joint                   | \$2,532                     | 1.27%                   | \$662,640,000           |
| Free Form Text Only     | \$62                        | 0.03%                   | \$11,100,000            |
| Ethnicity Not Available | \$35,879                    | 18.04%                  | \$14,187,825,000        |
| <b>TOTALS</b>           | <b>\$198,838</b>            |                         | <b>\$53,066,450,000</b> |

Table 49 Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

In addition to challenges based on race and ethnicity in the local lending market, there is also a gender gap in lending activity. As the table below demonstrates, female borrowers represented approximately 24 percent of all lending activity in 2019. Male borrowers represented 36.2 percent of all lending activity during the same time period. It is worth noting that the HMDA dataset also provides data on Joint applications with male and female co-applicants, which accounted for about 28 percent of the lending activity in the area.

**Disposition of Loan Applications, by Sex of Applicant, 2019**  
**Atlanta--Athens-Clarke County--Sandy Springs, GA-AL**

| Sex               | # of Loan Originated | Percent of Loans | Total Amount            |
|-------------------|----------------------|------------------|-------------------------|
| Male              | 72,118               | 36.27%           | \$17,395,520,000        |
| Female            | 49,527               | 24.91%           | \$10,016,145,000        |
| Joint             | 56,090               | 28.21%           | \$15,099,440,000        |
| Sex Not Available | 21,103               | 10.61%           | \$10,555,345,000        |
| <b>TOTALS</b>     | <b>198,838</b>       |                  | <b>\$53,066,450,000</b> |

Table 50 Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

**Loan Denials**

In addition to overall application numbers, a closer look at denial rates per loan type, loan purpose, and borrower demographics helps to reveal potential disparities in the home lending market. As the table below highlights, conventional loans represent the largest percent of denials across all loans and have the highest rates of denials within each of the loan types. At 57.3 percent of all denials, refinancings had the highest proportion of denials. Within the individual loan type, about 24 percent of conventional loans were denied, while government-backed FHA have denial rates of approximately 8 percent.

**Loan Application Denials, Loan Type, 2019**  
**Atlanta--Athens-Clarke County--Sandy Springs, GA-AL**

| Loan Type              | # of Applications Denied | \$ Amount              | % of all Denials |
|------------------------|--------------------------|------------------------|------------------|
| FHA                    | 361                      | \$91,365,000           | 8.11%            |
| Conventional           | 1,115                    | \$271,285,000          | 24.09%           |
| Refinancings           | 2,960                    | \$646,130,000          | 57.38%           |
| Home Improvement Loans | 1,591                    | \$117,225,000          | 10.41%           |
| <b>TOTALS</b>          | <b>6,027</b>             | <b>\$1,126,005,000</b> |                  |

Table 51 Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

Across the Atlanta MSA, non-White borrowers have a higher percentage of denial rates within each race or ethnicity for all lending activity in the area. This includes home purchase, home improvement, refinancing, and other purpose loans. For example, Black or African American applicants were twice as likely to be denied in comparison to White applications at 32 percent of denials for the group. Asian borrowers had the lowest denial rates at 5.5. Lastly, Hispanic or Latino borrowers had denial rates at 6.1 percent for 2019.

**Total Denials by Derived Race and Ethnicity, 2019**  
**Atlanta--Athens-Clarke County--Sandy Springs, GA-AL**

| Race/Ethnicity                            | # of Applications Denied | % of all Denials |
|---|--------------------------|------------------|
| American Indian or Alaska Native          | 301                      | 0.45%            |
| Asian                                     | 3,470                    | 5.16%            |
| Black or African American                 | 20,221                   | 30.06%           |
| Native Hawaiian or Other Pacific Islander | 249                      | 0.37%            |
| White                                     | 25,442                   | 37.83%           |
| 2 or more minority races                  | 286                      | 0.43%            |
| Joint                                     | 634                      | 0.94%            |
| Free Form Text Only                       | 61                       | 0.09%            |
| Race Not Available                        | 12,462                   | 18.53%           |
| Hispanic or Latino                        | 4,136                    | 6.1%             |
| <b>TOTALS</b>                             | <b>67,262</b>            |                  |

Table 52 Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

**Loan Denial Reasons for Home Purchases**

In addition to general denial rates based on the loan type, loan purpose, and borrower characteristics, an assessment of the primary reasons provided for application denials helps to understand potential barriers keeping borrowers from accessing homeownership opportunities. The following section examines denial reasons through the lens of race and ethnicity to reveal potential barriers to fair housing choice in the home buying market for protected classes.

The reasons for loan denials were consistent among demographic groups with debt-to-income ratio, credit history, and unverifiable information being among the top reasons in 2019. For some borrowers, a debt-to-income ratio was the primary reason given by financial institutions for denial of an application. It is worth pointing out that though Hispanic or Latino borrowers made up only a fraction of the lending activity. The denial reasons given for the group reflected similar trends noted in other demographic groups with debt-to-income and credit history being the top reasons for loan denial.

**Discussion of Results**

As data from this chapter has shown, discrepancies in the home lending market have not significantly improved for communities of color in the Atlanta MSA since the last Analysis of Impediments to Fair Housing Choice in 2015. Based on HMDA data, recent lending activity does not reflect the racial or ethnic composition of the area. Black or African American and Hispanic borrowers are underrepresented and White borrowers overrepresented in the local market. Moreover, denial rates by race or ethnicity are disproportionately impacting communities of color, regardless of income. Female, Black or African American borrowers, in particular, are experiencing hurdles in effectively securing a home loan in the area.

The 2019 HMDA data also reveals that issues related to debt-to-income ratios and credit history are the main reasons for loan denials in the area. Other factors, such as adequate collateral, down payments, and mortgage insurance, are playing a drastically less significant role in loan denials. Though these denial reasons are affecting all borrowers, in some cases, such as with debt-to-income ratios, the effects are experienced more pronouncedly by Asian and Native Hawaiian or Other Pacific Islander borrowers. When borrowers from

communities of color are able to secure a loan, their average loan amounts are often lower than those from White borrowers. Such differences highlight the ongoing struggle for communities of color in securing adequate capital to access the home buying market in the area and ultimately build lasting family wealth.

Looking ahead, Cobb County will continue to monitor these lending patterns to tailor local programs to meet the needs of all residents and encourage greater financial security and homeownership opportunities in the jurisdiction.

## **VI. ANALYSIS OF CURRENT FAIR HOUSING ACTIVITY**

### ***Overview***

Cobb County is committed to furthering fair housing efforts by promoting fair and equal housing opportunities for its residents. It is committed to highlighting the Fair Housing Law, Title VIII of the Civil Rights Act of 1968 by continuing to address discrimination in our community and to support programs that will educate the public about the right to equal housing opportunities.

It is the County's policy to provide services without regard to race, color, ancestry, religion, national origin, age, gender, marital status, familial status, source of income, sexual orientation or disability. This commitment extends to all grant-funded housing programs provided by the County.

### ***Furthering Fair Housing***

The Fair Housing Act has two goals: to end housing discrimination and to promote diverse, inclusive communities. The second goal is referred to as Affirmatively Furthering Fair Housing (AFFH), and it embodies our strongly-held American values of fair access and equal opportunity.

The Affirmatively Furthering Fair Housing provision was part of the Fair Housing Act when it was passed by Congress in 1968. Through that provision, Congress directed HUD to make sure that neither the agency itself, nor the cities, counties, states and public housing agencies it funds, discriminate in their programs. Further, Congress intended that HUD programs be used to expand housing choices and help make all neighborhoods places of opportunity, providing their residents with access to the community assets and resources they need to flourish.

### ***What is Housing Discrimination?***

Housing discrimination is unjust or prejudicial treatment of individuals, in the area of housing and real estate, based on the individual's protected class. Within the context of an increasingly diverse society, the potential for discrimination in housing choice remains an issue which must be vigilantly observed. In efforts to combat discrimination, federal and state laws have been enacted to provide a framework for ensuring fair housing choice.

### ***Fair Housing Complaints***

The Office of Fair Housing and Equal Opportunity [FHEO] administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

### ***Complaints Filed With HUD***

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing, and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations, and hate violence. The following table identifies the number of complaints filed by year in the Georgia State at which the alleged discrimination occurred, and the basis for the complaint.

## V. FAIR HOUSING TRENDS AND COMPLAINTS

Understanding fair housing trends and complaints is critical in assessing housing access free from discrimination. This chapter reviews the fair housing enforcement process and fair housing complaints filed at the local and federal levels to assess trends, emerging issues, and potential barriers to fair housing access, enforcement, and education in the context of Cobb County.

Cobb County is committed to furthering fair housing efforts by promoting fair and equal housing opportunities for its residents. It is committed to highlighting the Fair Housing Law, Title VIII of the Civil Rights Act of 1968 by continuing to address discrimination in our community and to support programs that will educate the public about the right to equal housing opportunities.

It is the County's policy to provide services without regard to race, color, ancestry, religion, national origin, age, gender, marital status, familial status, source of income, sexual orientation or disability. This commitment extends to all grant-funded housing programs provided by the County.

### **What is Housing Discrimination?**

Housing discrimination is unjust or prejudicial treatment of individuals, in the area of housing and real estate, based on the individual's protected class. Within the context of an increasingly diverse society, the potential for discrimination in housing choice remains an issue which must be vigilantly observed. In efforts to combat discrimination, federal and state laws have been enacted to provide a framework for ensuring fair housing choice.

### **Complaints Filed With HUD**

The Office of Fair Housing and Equal Opportunity [FHEO] administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

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Complaints filed with HUD are classified by race, national origin, disability, familial status, religion, sex and retaliation bases. FHEO investigates complaints which may be of one or both of the following types:

- Discrimination under the Fair Housing Act (including housing that is privately owned and operated)
- Discrimination and other civil rights violations in housing and community development programs, including those funded by HUD.

Complaints involving discrimination under the Fair Housing Act may be applied in cases where one's discrimination in renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities are violated. The filing of these complaints may be against property owners, property managers, developers, real estate agents, mortgage lenders, homeowner associations, insurance providers, and others who affect housing opportunities.

Complaints involving discrimination in housing and community development programs may be based on the violation of rights because of discrimination and other violations of civil rights in HUD programs. For example, the failure to ensure meaningful access by persons with limited English proficiency. Applicable laws include:

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Title II of the American with Disabilities Act of 1990
- Architectural Barriers Act of 1968
- Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972

Complaints may be filed against any recipient or sub-recipient of HUD financial assistance, including states, local governments, and private entities operating housing and community development and other types of services, programs, or activities.

From January 1, 2015 through December 31, 2019, the period for which data was available for this assessment Cobb County recorded 86 complaints filed with FHEO. As previously mentioned, cases to FHEO can be filed based on one or several reasons. As the table below highlights, most of those cases (101) were filed on the basis of disability (38 cases), followed by race(33 cases). The height of the number of cases occurred in 2017 and 2019. Many factors may contribute to such change, such as better housing conditions, however the slight increase in cases filed in 2016 indicates that the recent volatility of housing issues in the jurisdiction may require continued monitoring and public education regarding fair housing rights and the grievance process.

## Total Cases Filed with HUD FHEO 2015-2019

| YEAR                         | DISABILITY | RACE      | FAMILIAL STATUS | COLOR    | RETALIATION | NATIONAL ORIGIN | SEX      | RELIGION | YEAR TOTALS |
|------------------------------|------------|-----------|-----------------|----------|-------------|-----------------|----------|----------|-------------|
| 2015                         | 3          | 5         | 2               | 0        | 0           | 1               | 2        | 0        | 13          |
| 2016                         | 7          | 6         | 1               | 0        | 0           | 0               | 2        | 0        | 16          |
| 2017                         | 11         | 7         | 5               | 0        | 0           | 4               | 1        | 1        | 29          |
| 2018                         | 7          | 5         | 2               | 0        | 1           | 1               | 1        | 0        | 17          |
| 2019                         | 10         | 10        | 1               | 0        | 1           | 2               | 2        | 0        | 26          |
| <b>COMPLAINT TYPE TOTALS</b> | <b>38</b>  | <b>33</b> | <b>11</b>       | <b>0</b> | <b>2</b>    | <b>8</b>        | <b>8</b> | <b>1</b> | <b>101</b>  |

Table 53 Source: HUD FHEO Filed Cases, 2020

Note: Cases may have multiple bases, as such, the total presented is higher than the 101 actual cases filed.

### Complaint Trends

Over the last five years from 2015 to 2019 a total of 101 fair housing cases were filed with HUD. Complaints by type were most commonly made on the basis of disability, followed by race and familial status. According to the National Fair Housing Alliance 2019 Fair Housing Trends Report, the number of complaint filed nationwide in 2018 was 31,202, which was the highest number of reported complaints of housing discrimination since NFHA began collecting this data in 1995.<sup>10</sup> eight percent increase over complaints reported in 2017. Additionally, there was a startling uptick in hate crime offenses and the number of reported victims of hate crimes.<sup>11</sup> There was a 15.3 percent increase in the number of housing-related hate crimes.

According to the Report, there also was a significant increase in the number of complaints of harassment, reflecting the societal decline in civility and fairness and that those filled with bias and hate feel emboldened to act with impunity. There were 897 complaints of harassment in 2018, up significantly from 747 in 2017 and 640 in 2016. Harassment against persons in protected classes occurred in the form of coercion, intimidation, and threats, both in the provision of housing or in a housing setting. There has been unprecedented focus on the issue of sexual harassment in housing-related situations, not because sexual harassment in housing situations is on the rise but because there is increased awareness of the nature and extent of harassment in all arenas and because there is less stigma now in acknowledging that one has been a victim of sexual harassment.

Overall, the 2018 National complaint data shows that private fair housing organizations continue to address the majority of housing discrimination complaints reported throughout the country. Local complaint trends reveal that while complaints have increased. Households that are mostly female-headed, low-income, and majority African American remain more likely to file a fair housing complaint. Interviews with stakeholders and the survey conducted for this assessment highlighted such consistency and the ongoing need to address the root causes of the fair housing issues.

While outreach and education efforts to inform the public on fair housing protections have resulted in significant progress for Cobb County, more will need to be done in the next five years to ensure that recent fair housing trends are curbed or eliminated and that all residents are provided fair housing choice and access.

<sup>10</sup> NFHA, <https://nationalfairhousing.org/2019-fair-housing-trends-report/>

<sup>11</sup> NFHA, <https://nationalfairhousing.org/2019-fair-housing-trends-report/>

## Hate Crimes

Hate crimes are violent acts against people, property, or organizations motivated by a bias against race, gender, gender identity, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation’s (FBI) Uniform Crime Reporting Program collects statistics on these incidents. However, it was not until early in the last decade that the federal government began to collect data on how many and what kind of hate crimes are being committed, and by whom.

Fair housing violations due to hate crimes occur when people will not consider moving into certain neighborhoods, or have been run off from their homes for fear of harassment or physical harm. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate or act violently toward a person who has exercised their right to free housing choice. Persons who break the law have committed a serious crime and can face time in prison, large fines or both, especially for violent acts, serious threats of harm, or injuries to victims. In addition, - similar state and local laws may be violated, leading to more punishment for those who are responsible. Some examples of illegal behavior include threats made in person, writing or by telephone; vandalism of the home or property; rock throwing; suspicious fires, cross-burning or bombing; or unsuccessful attempts at any of these.

Reporting hate crimes is voluntary on the part of the local jurisdictions, and not all jurisdictions are represented in the reports. However, according to the Cobb County Police Department, Cobb County - initiated collecting data regarding hate crimes in September of 2010. Another obstacle to gaining an accurate count of hate crimes is the reluctance of many victims to report such attacks.

Hate crime statistics compiled for Cobb County demonstrate that a total of 54 hate crimes were committed between 2016 and 2018. Harassing/threatening communications, criminal trespass, simple battery, terroristic threat and disorderly conduct are the most common hate crimes in the area.

| <b>COBB COUNTY, GEORGIA HATE CRIME STATISTICS</b> |                                     |   |              |                           |                |            |                            |                                 |                    |                    |                |
|---|-------------------------------------|---|--------------|---------------------------|----------------|------------|----------------------------|---------------------------------|--------------------|--------------------|----------------|
| Year  | Agency                              | Number of incidents per bias motivation |              |                           |                |            |                            | Number of incidents per quarter |                    |                    |                |
|   |                                     | Race/<br>Ethnicity/<br>Ancestry         | Religi<br>on | Sexual<br>orientat<br>ion | Disabi<br>lity | Gend<br>er | Gend<br>er<br>ident<br>ity | 1st<br>quart<br>er              | 2nd<br>quart<br>er | 3rd<br>quart<br>er | 4th<br>quarter |
| 2016  | Cobb County<br>Police<br>Department | 19                                      | 2            | 4                         | 0              | 0          | 0                          | 6                               | 7                  | 12                 | 0              |
| 2017  | Cobb County<br>Police<br>Department | 9                                       | 2            | 1                         | 0              | 0          | 0                          | 1                               | 5                  | 3                  | 3              |
| 2018  | Cobb County<br>Police<br>Department | 14                                      | 2            | 1                         | 0              | 0          | 0                          | 4                               | 7                  | 2                  | 4              |

Table 54 Source: U.S. Department of Justice Federal Bureau of Investigation

## VI. REVIEW OF PRIOR AND CURRENT ACTIONS TAKEN TO AFFIRMATIVELY FURTHER FAIR HOUSING

### **Affirmatively Furthering Fair Housing**

Affirmatively furthering fair housing requires overcoming historic patterns of segregation, promoting fair housing choice, and fostering an inclusive community. Identifying Cobb's barriers to fair housing calls for the development of comprehensive strategies and timely actions to overcome existing impediments.

The Analysis of Impediments assesses previous actions taken and current conditions that may continue to restrict housing choice for people protected under State and federal fair housing laws. With such an assessment in mind, this section presents the previously identified impediments to fair housing choice and a summary of the actions taken to address those challenges. The analysis and its results will help outline the underlying conditions and trends still relevant in Cobb County.

Effective Tuesday, September 8, 2020, HUD's "*Preserving Community and Neighborhood Choice*" Final Rule will officially repeal HUD's 2015 housing rule known as "*Affirmatively Furthering Fair Housing Choice*" or AFFH and the 1994 Analysis of Impediments to Fair Housing Choice (A.I.) where they appear in regulation. HUD's new housing rule is intended to lessen the paperwork burden on local grantees and empowering entitlement communities by giving them maximum flexibility in designing and implementing sound policies that reflect local needs by eliminating overly burdensome, intrusive, and inconsistent reporting and monitoring requirements.

HUD's new rule will still require that grantees commit to "*use funds to take active steps to promote fair housing*", however, the grantee AFFH certifications will be deemed sufficient provided the grantee took any action during the relevant time period related to promoting fair housing.

### **Previous Impediments to Fair Housing Choice**

The previously identified impediments to fair housing choice in Cobb's 2015 AI are listed below. The impediments identified are not listed in any order or priority. The analysis and status of these impediments are based on the data available at the time and the feedback provided by community members and stakeholders. An analysis of past and existing trends is further addressed in other sections of this document.

As presented in the 2015 Analysis of Impediments to Fair Housing Choice, the barriers identified in 2015 provided the County a path forward in furthering fair housing protections in the jurisdiction. Assessing the status of these actions helps to inform the current trends that may continue to limit fair housing choice in Cobb County. The following are detailed descriptions of the impediments as presented in the 2015 Analysis of Impediments assessment:

| IMPEDIMENT  | DESCRIPTION   | ACTIONS UNDERTAKEN   |
|---|---|--|
| Impediment #1- Lack of Fair Housing Education   | To address the need for increased public education relative to fair housing, it is recommended that Cobb County expand its current initiatives to reach more people.  | CDBG Program funds were allocated to Fair Housing initiatives and implementation of Fair Housing workshops. Fair Housing information is printed in English & Spanish Workshop materials are presented in English & Spanish |
| Impediment #2 – Disparities in Mortgage Lending   | Combine fair housing testing with a plan for education of mortgage lenders to ensure lenders are knowledgeable of their responsibilities under the Fair Housing Act.  | Increased Fair Housing Education throughout the County.  |
| Impediment #3 - Zoning Provisions Restricting Residential Uses from Residential Districts | Cobb County further study the effects of its zoning code and the zoning ordinances of its municipalities on the location of halfway houses.   | County review of zoning regulations as it relates to Fair Housing, land use permits, and land use permit request.  |
| Impediment #4 - Lack of Accessibility to Public Transportation                            | It is recommended that the Cobb County Department of Transportation continue to be proactive in addressing the transportation issues throughout the County by conducting corridor studies and comprehensive transportation planning (CTP) studies to access the County’s public transportation needs. | County established Livable Centers Initiatives with Atlanta Regional Commission (ARC), Cobb County Bicycle and Pedestrian Improvement Plan. South Cobb Implementation Strategy, Northwest Land Vulnerability Analysis      |
| Impediment #5 - High Housing Costs  | The County and its public and private sector partners should continue to develop long-term strategies to serve as an ongoing affordable housing vision and set measurable goals for housing production and preservation.  | County established an Affordable Housing Study and included aspects of affordable housing in the 2020 Comprehensive Plan   |

Table 55. Source: Cobb County 2015 Analysis of Impediments, [www.cobbcounty.org/cdbg](http://www.cobbcounty.org/cdbg)

## VII. IMPEDIMENTS TO FAIR HOUSING CHOICE

The following are the identified impediments based on the assessment conducted throughout the 2020 Analysis of Impediments to Fair Housing Choice process. The new identified impediments to fair housing access and choice represent ongoing issues in Cobb County. Of the previously identified impediments, a lack of public transportation, a lack of affordable housing, and lack of Fair Housing education are still present in the County and will continue to be addressed. Below is a list of impediments:

### **Impediment 1: Lack of Affordable Housing**

There is a lack of affordable housing in the Cobb County due to the County's population growth and influx of higher priced housing construction. This has created a high demand on a limited affordable housing supply, and a corresponding increase in the cost of rental and sales housing.

**Goal:** Increase the supply of affordable housing by new construction and rehabilitation of various types of housing which is affordable to lower income households.

**Strategies:** In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing throughout the County.
- Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.

### **Impediment 2: Lack of Accessible Housing**

There is a lack of accessible housing in Cobb County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in the County and the desire of disabled persons who want to live independently. Interviews indicated that all accessible housing is occupied, and the County's disabled population is growing.

**Goal:** Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

**Strategies:** In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- Financially assist in improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to remain in their homes.
- Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- Encourage and financially support landlords to make reasonable accommodations to units in their building so persons who are disabled can continue to reside in their apartments.
- Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

### **Impediment 3: Barriers Limiting Housing Choice**

There are physical, economic, and social barriers (including older inaccessible housing, credit requirements that prevent all residents from obtaining mortgages, and concentrations of poverty and racial or ethnic minorities) in Cobb County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

**Goal:** Eliminate physical, economic, and social barriers in the County and increase housing choices and opportunities for low-income households and members of the protected classes throughout the County.

**Strategies:** In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- Support and promote the development of affordable housing in areas of opportunity where minority and low-income persons and families may reside.
- Promote and support the development of affordable housing for minorities and low-income households who are being "forced out" of their homes and may not have housing resources to relocate.
- Support and promote sound planning principals and make revisions to land development and zoning ordinances to eliminate "exclusionary zoning," which restricts the development of affordable housing.

#### **Impediment 4: Lack of Fair Housing Awareness**

There is a continuing need to educate and promote the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA), awareness of discriminatory practices, and combat “NIMBYism.” A total of 63.3% of survey respondents in the County believed that a lack of education about fair housing contributed to unreported problems.

**Goal:** Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discrimination laws, and regulations, so that the residents in Cobb County can Affirmatively Further Fair Housing (AFFH) and eliminate the negative attitude of “Not In My Back Yard”(NIMBYism).

**Strategies:** In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending is not taking place.
- Publish and distribute housing information and applications in both English and Spanish to address the increase in Limited English Proficiency residents in Cobb County.
- Educate residents and local officials to eliminate neighborhood misconceptions and combat “NIMBYism.”

## **VIII. CONCLUSION**

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of Cobb County. These barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. The County will work diligently toward achieving fair housing choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. The County has an important role to play but cannot on its own bring about the change necessary to remove these impediments to fair housing choice.

The recommendations proposed in this document address impediments relative to the need for fair housing education, the age of housing stock, unequal distribution of resources, disparities in lending practices, and location of affordable housing. Implementation of the recommendations can assist the county in achieving the reality of an open and inclusive region that truly embraces fair housing choice for all its residents.

## **IX. APPENDICES**

The following items are in the appendix:

- A. Notices and Publications for Community Participation
- B. Summary of Public Comments
- C. A.I. Survey & Results
- D. HUD Fair Housing Complaint Data