# Cherokee County Analysis of Impediments to Fair Housing Choice

April 2018

Prepared for Cherokee County, Georgia by



# **Table of Contents**

I. Preface	4
II. Executive Summary	5
III. Community Participation Process	10
IV. Assessment of Past Goals, Actions & Strategies	19
V. Fair Housing Analysis	23
A. Demographic Summary	23
B. General Issues	31
i. Segregation/Integration	31
ii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)	41
iii. Disparities in Access to Opportunity	44
iv. Disproportionate Housing Needs	77
C. Publicly Supported Housing Analysis	87
D. Disability and Access Analysis	96
E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis	106
VI. Fair Housing Goals and Priorities	113
Appendices	118

#### I. Preface

This Analysis of Impediments to Fair Housing Choice was originally prepared as an Assessment of Fair Housing (AFH) under the regulations contained in HUD's 2015 AFFH Final Rule. Cherokee County followed the new AFH format and guidelines, however, before the document was electronically submitted to HUD for approval, HUD issued a notice, dated January 8, 2018, to all its Consolidated Plan grantees advising of an immediate AFH deadline extension to at least October of 2020. The notice further required that grantees instead prepare and keep on file a current Analysis of Impediments (AI).

Because the County had already invested significantly in its AFH, both in terms of funding, staff time, and community engagement, that AFH document is now presented here as an AI. This is consistent with guidance from HUD's Region IV Fair Housing and Equal Opportunity office that an AFH is generally more thorough and detailed than an AI and that, if done well, an AFH should meet the AI requirements. Additionally, the County specifically compared this document with the AI requirements in the *Fair Housing Planning Guide* and believes it adequately meets and, in some cases, exceeds those standards. At the same time, this document is also fully compliant with AFH regulations and is appropriate for re-submission to HUD as an AFH at whatever time such a submission may become due.

# **II. Executive Summary**

# 1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

Cherokee County receives funds from the United States Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG). As a participant in this program, the County is required to complete a fair housing study known as an Analysis of Impediments to Fair Housing Choice (AI). This AI covers the unincorporated county as well as its municipalities.

The AI studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; disproportionate housing needs; locations, occupancy, and policies for publicly supported housing; disability and access; and fair housing enforcement and outreach resources and activities. Based on the findings of this research, the AI proposes strategies to overcome the identified fair housing issues.

Public input from local residents and other stakeholders was a key component of the AI research and the County used a variety of approaches to achieve meaningful engagement with the community on the topics listed above. The County hosted four fair housing meetings for the public with a total of 48 attendees. A community-wide survey on fair housing received 26 responses. The meetings and survey were advertised with an ad in the *Cherokee Tribune*, announcements on the County's website, and flyers posted in government buildings and distributed through stakeholder networks.

Representatives from 12 housing and/or community development-related groups participated in stakeholder interviews. They represented a variety of relevant viewpoints, including elected officials, County staff, nonprofit social service organizations, nonprofit housing developers, public transportation staff, the Canton Housing Authority, the Cherokee County Chamber of Commerce, and others.

This Executive Summary provides a brief overview of the study's key findings, followed by an outline of fair housing goals and related actions.

#### **Demographics**

Cherokee County has a population of about 230,000 residents according to the 2012-2016 Five-Year American Community Survey. Three racial and ethnic groups make up the large majority of the county's population: non-Latino whites (81%), Latinos (10%) and non-Latino African Americans (5%).

Since 1990, Cherokee County's population more than doubled, growing from about 90,000 to over 200,000 residents. Several groups saw considerable growth over the last two decades. Cherokee

County's Latino population grew by about 20 times its 1990 population and the number of African American residents increased by a factor of 6. The Asian population expanded from 291 residents to over 3,500. The non-Latino white population doubled since 1990, adding 87,703 residents.

#### Segregation and Integration

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. As of 2010, segregation levels in the county were low (under 40) for all of the pairings examined. They ranged from a DI of 30.22 for Asian and white residents to a DI of 35.48 for Latino and white residents.

In contrast, dissimilarity indices in the Atlanta region show a high degree of segregation amongst African American and white residents and moderate levels of segregation in each of the other pairings. Although there are low levels of segregation within Cherokee County, it is considerably less diverse than the Atlanta region as a whole, and this difference in racial and ethnic composition contributes to the elevated segregation levels at the regional scale.

#### Racially & Ethnically Concentrated Areas of Poverty

HUD developed a methodology that combines demographic and economic indicators to identify areas it classifies as racially and ethnically concentrated areas of poverty (R/ECAPs). HUD defines a R/ECAP as a census tract that has an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. There are no census tracts in Cherokee County that meet HUD's R/ECAP definition.

### Disparities in Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors such as access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. This report provides analysis of the index scores on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health.

Racial and ethnic disparities in access to opportunity in Cherokee County are small, particularly compared to disparities that exist in the Atlanta region. In the various opportunity indices analyzed, Hispanic residents of the county were most often the group with the lowest average index scores. Hispanics were more likely than any other group to live in communities with high rates of poverty, low-performing schools, and low levels of labor market participation. Even in cases where areas providing high levels of opportunity were observed to be demographically diverse, the diversity was attributable more to higher shares of African Americans or other, non-Hispanic people of color than to Hispanics.

#### Disproportionate Housing Needs

HUD defines four housing problems, including a cost burden (more than 30% of monthly housing income is spent on housing costs), overcrowding (more than 1.0 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities, and lack of complete plumbing facilities. In Cherokee County, there are 24,529 households with one or more housing problems, constituting about one-third of households countywide. Four groups have disproportionate housing need rates: African Americans, Latinos, Asians or Pacific Islanders, and Native Americans. There are three areas in the county where more than 40% of households have a housing need, including two tracts in Canton and one in Woodstock.

In Cherokee County, households of color are considerably less likely to be homeowners than white households. More than four-fifths of white households own their homes, compared to 61% of Black households and 50% of Latino households

#### **Publicly Supported Housing**

Public housing in Cherokee County is operated by the Canton Housing Authority (CHA) and not by the County. CHA's public housing and Project-Based Section 8 units in the county are overwhelmingly occupied by white households, while Housing Choice Voucher holders are somewhat more evenly divided between white and Black households, with Black households making up the largest share. Given the county's overall demographics, white residents are overrepresented in Project-Based Section 8 units and are underrepresented public housing and HCV units. Hispanics comprise 9.57% of the county's population, but are 12.03% of the CHA's public housing residents, 5.97% of Project-Based Section 8 residents, and 8.98% of voucher holders.

#### Disability and Access

In Cherokee County, an estimated 20,110 persons 5-years-old or older have a disability, representing 9.91% of the total population. People aged 18 to 64 have the highest disability rate at 5.36% and the rate for seniors (persons age 65 and older) is 3.76%. In contrast, fewer than 1% of children between the ages of 5 and 17 are disabled. Within the Atlanta region, the disability rate for the population aged 5 and up is 10.24%. This rate is comparable to that of the county, indicating that people with disabilities are approximately as likely to live in Cherokee County as in the region overall. Areas where people with disabilities are most clustered include Canton, Woodstock, Sixes, and the far southwest corner of the county, in the neighborhoods surrounding Clark Creek Elementary School.

#### Fair Housing Enforcement and Outreach

Georgia has adopted a parallel version of the federal Fair Housing Act known as the Georgia Fair Housing Act. Both the federal and state laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by federal law. Moreover, the state prohibits local governments from adopting fair housing ordinances that extend protected class status to individuals who are not currently protected under the Georgia Fair Housing Act.

Cherokee County has three primary sources of fair housing information, outreach, and enforcement: Metro Fair Housing Services, the Georgia Commission on Equal Opportunity, and the U.S. Department of Housing and Urban Development. Although Georgia law permits local governments to adopt fair housing ordinances consistent with the state's act, Cherokee County has not adopted a local nondiscrimination or fair housing ordinance or established a local commission empowered to receive and resolve fair housing complaints.

#### Fair Housing Goals

Cherokee County has identified the following fair housing goals based on the AI research and findings. The goals will direct strategies to alleviate the fair housing issues and contributing factors described above.

Goal #1 – Increase Availability of Affordable Housing: Many stakeholders indicated a growing need to more proactively address the issue of housing affordability in Cherokee County. The County should seek opportunities for Low Income Housing Tax Credit developments, including conducting outreach to potential developers to interest them in working in Cherokee County and providing letters of support for developers' applications. A lack of housing that accepts Housing Choice Vouchers was also identified by stakeholders as an issue in the County. To increase the pool of landlords who accept vouchers, the County should reach out to private sector landlords to encourage them to participate in the program. Additional funding sources for TBRA, such as through the state's HOME program, should be explored to expand the availability of assistance for low income households.

Goal #2 – Expand Access to Opportunity in Low and Moderate Income Areas: Although Cherokee County does not have any R/ECAP census tracts, there are low and moderate areas of the county and protected class residents who should continue to be served by community development efforts to expand access to opportunity. These activities may include things such as infrastructure improvements to enhance the physical aspects of a neighborhood and facility improvements or financial support to local nonprofits that expand access to opportunity factors such as extracurricular educational activities, healthcare access, and job skills training.

**Goal #3 – Address Substandard Housing:** Stakeholder input indicated that many households live in substandard or deteriorating homes, whether as renters or homeowners. To address the physical condition of units, the County should enhance code enforcement efforts and work with property owners to ensure that necessary improvements are made. The County should also continue partnering with local organizations to assist low and moderate income homeowners with emergency and other needed repairs. In conjunction with Goal #5 related to fair housing education, tenants should also be made aware of who to contact with concerns about code enforcement issues in rental units.

Goal #4 - Increase Accessible Housing Options for People with Disabilities: Three provisions of Cherokee County's zoning code are recommended for review and revision to be more complaint with the Fair Housing Act and further fair housing choice: 1) The requirement that group home occupants be ambulatory should be reviewed and clarified; 2) Minimum spacing requirements for group homes should be eliminated; and 3) A reasonable accommodation ordinance should be adopted to include specifics regarding the form that a request for accommodation should take, the time frame within which the reviewing authority must make a decision, the form that decision must take and whether conditions may be attached; and how to appeal a decision. In addition to zoning changes, the County should continue to

look for ways to improve the availability of affordable, accessible housing, including through LIHTC developments and continued home modifications by the Volunteer Aging Council.

**Goal #5 – Provide Fair Housing Education and Outreach to Protected Classes:** Cherokee County lacks sufficient education resources and capacity to ensure fair housing for its residents. To increase the resources available locally, the County should annually set aside a portion of its CDBG funds to be subgranted to a responsive local organization that will implement a program of education and awareness. Specifically, the grant recipient should focus on educating landlords about their Fair Housing Act responsibilities, and the public on how to recognize discrimination and how to file a complaint. Specific outreach should be conducted to Cherokee County's Latino community to ensure that fair housing education materials are provided to Spanish speakers with limited English proficiency.

### **III. Community Participation Process**

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

Cherokee County used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders in the county.

#### **Fair Housing Workshops**

The County held four fair housing workshops open to the general public in December 2017. Each workshop began with a short presentation providing an overview of fair housing law, how to access HUD-provided AFFH data and maps, and ways to provide input for the study. The remainder of the workshops were devoted to an interactive discussion of fair housing, neighborhood conditions, and community resources in Cherokee County. A total of 48 attendees came to the workshops. Meeting dates, times, and locations are shown below:

#### Monday, December 11, 2017 at 1:00 pm

Canton City Hall 151 Elizabeth Street Canton, GA 30114

#### Monday, December 11, 2017 at 4:00 pm

Next Step Ministries 7709 Turner Road Woodstock, GA 30188

#### Tuesday, December 12, 2017 at 10:30 am

MUST Ministries 111 Brown Industrial Parkway Canton, GA 30114

#### Wednesday, December 13, 2017 at 1:00 pm

Cherokee County Senior Services 1001 Univeter Road Canton, GA 30115

#### Stakeholder Interviews

During the week of December 11, 2017, individual and small group stakeholder interviews were held at the County's Administrative Offices. For people unable to attend an in-person interview, follow-up via telephone was conducted the following week. Stakeholders were identified by Cherokee County staff and represented a variety of viewpoints, including senior services, law enforcement, non-profit organizations, housing authority staff, homeless service providers, organizations serving people with disabilities, and non-profit housing developers.

Interview invitations were made by email and/or phone to 31 stakeholders. Seventeen people participated in an interview, and their organizations are listed in response to the next question in this section. A summary of input received from interviewees is provided in response to question 4.

#### **Community Survey**

The third method for obtaining community input was a 25-question survey available to the general public, including residents and other stakeholders. The survey was available online and in hard copy in both English and Spanish from December 5, 2017 through January 5, 2018. A total of 26 respondents took the survey. A summary of results is provided in response to question four of this section.

#### **Community Engagement Advertisement**

A variety of techniques were used to advertise the fair housing workshops and community survey to as broad an audience as possible. They included:

- An ad placed in the *Cherokee Tribune*;
- Flyers posted in government buildings and at the Canton Housing Authority, and distributed to stakeholders via email; and
- Through Cherokee County Community Development Department's website and the Canton Patch website.

To facilitate participation by people with limited English proficiency, flyers contained instructions for participants needing any special accommodations to participate in the workshops. Surveys were also available in Spanish online and in hard copy.

#### **Public Comment Period**

Cherokee County held a 30-day public comment period from March 9 to April 9, 2018 to receive input on the draft AI. A public notice announcing the comment period and a public hearing was published in the *Cherokee Tribune* and the draft AI was made available both online and at the County's CDBG Program Office during this period. The public hearing was held on Tuesday, March 27, 2018 at 10:00 a.m. in Cherokee County's Executive Conference Room at 1130 Bluffs Parkway in Canton. Four people attended the hearing. No comments were received during the comment period, neither in writing nor orally at the hearing.

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

Representatives of the following organizations were consulted in the development of this AI. Consultations may have occurred in an interview, participation at a public meeting or event, or other correspondence:

- Canton Housing Authority
- Cherokee County Chamber of Commerce
- Cherokee County Homeless Veterans
- Cherokee County Marshal's Office
- Cherokee County Senior Services
- Cherokee County Volunteer Aging Council
- Cherokee Family Violence Center
- City of Woodstock
- Concept Interstate Properties, Inc.
- MUST Ministries
- Next Step Ministries
- Habitat for Humanity of North Central Georgia
- 3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

Over 75 people participated in the community engagement process used to develop this AI. A total of 48 attended one of the four fair housing workshops. Attendance at one meeting was low due to inclement weather and related school closings. At the other three meetings, conversation was insightful and constructive, and participants showed an understanding of and engagement with discussion topics. Working through local organizations (MUST Ministries, Next Step Ministries, and Cherokee County Senior Services) to hold and publicize meetings worked well to encourage attendance by protected class groups.

The fair housing survey was completed by 26 respondents and was advertised in the *Cherokee Tribune* and through the Canton Housing Authority. In the future, survey participation may be higher through more direct outreach to Housing Authority residents.

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

For the community participation process, the consulting team developed a standard question set for use in public workshops and interviews. Listed below are each of the questions along with summarized comments from interview participants and meeting attendees. These comments do not necessarily reflect the views of Cherokee County. All comments received were considered in the development of this AI.

#### **Fair Housing Workshops**

- 1) What do you believe are some of the best places to live in Cherokee County? What makes them great?
  - Woodstock because it's growing and there are parks, shopping, things to do, and good schools with special needs programs
  - Downtown Canton has a good social aspect
  - Some people like the north side of the county because it's less built-up but transportation options are better in south Cherokee County
  - Around Woodstock and Canton because there are amenities, taxes are relatively low, schools are good, and crime rate is pretty low
  - Holly Springs because it has good schools, nice homes, and low crime
  - Lake Arrowhead because it's gated, has lake access, and nice views
- 2) Has anyone recently moved within the County? Why did you choose the area you moved to? Is there anyone who has always lived in the same place? Why have you chosen to stay where you are?
  - Interest in moving to Cherokee County because there are less restrictions on group homes than in Cobb County and the day program for people with disabilities is great
  - Looking for accessibility, sidewalks, curb cuts, ample handicap parking, and accessible businesses
  - Looking for a quiet neighborhood
- 3) If you could afford housing anywhere in the County, would you move? Why/why not? Are there any barriers that would keep you from moving to the neighborhood of your choice?
  - Cost; more desirable areas are more expensive
  - Distance; some locations would require a lot more driving
  - Lack of diversity in Holly Springs is a drawback
- 4) Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might limit housing choices?
  - There shouldn't be other factors that influence housing choice but it still happens
  - Probably based on race and ethnicity and whether or not you have children
  - More of an issue on the rental side versus for-sale market
- 5) Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
  - Yes; there are some areas in Canton with clusters of Latino and African American households
- 6) Are you aware of any housing discrimination that occurs in the area? What forms does it take? What are some things that can be done to overcome discrimination?

- Not discrimination per se, but instances of being taken advantage of by landlords (paying a
  deposit for an uninhabitable unit; landlord failing to pay the mortgage on a unit)
- The housing system by its nature is discriminatory to people with disabilities because they can fall through the cracks when nothing available meets their needs; often times remaining eligible for necessary assistance limits the amount of income you can earn
- 7) What types of fair housing services (education, complaint investigation, testing, etc.) do you know of in the area? Who provides these services? How well are they coordinated with the work of other organizations in the community?
  - Most attendees did not know where to report housing discrimination
  - State of Georgia fair housing office
  - Contact an attorney or the media
  - There is nothing governing landlords; there is a need for a tenants union or something similar that would hold landlords accountable for fixing up units that are in bad shape
  - Many people don't want to complain because they have nowhere else to live if the landlord were to evict them in retaliation
- 8) Is there an adequate supply of housing that is accessible to people with disabilities? Do you feel like people with disabilities are more likely to live in some parts of the County than in others? What barriers are there in facing government services and facilities; transportation, roads, and sidewalks; schools and educational programs; and jobs?
  - Accessible housing is definitely a need
  - There is a need for diverse housing types but rely on specialist organizations to provide accessible housing
  - If housing doesn't have supportive services and is not on a bus line, it's not practical for many people
  - The type of housing people are looking for depends on their disability and what they are personally looking for; some people are looking to live independently but have very limited options
  - A lot of times housing that is deemed to be accessible isn't really
  - New neighborhoods have very few ranches so you would have to have something built to your specifications, which can be expensive and take years of planning
  - Old hospital should be converted to senior housing once they remodel; there's big need for small/efficiency units for seniors and this need is only going to grow; people call looking for assistance and there is nowhere to refer them
  - Ramps and other accessibility modifications are a big need
- 9) Are public resources (e.g., parks, schools, roads, police and fires services, etc.) invested in evenly throughout all neighborhoods?
  - CATS is not meant for mass transit and is typically used to access doctor appointments; not helpful for people working a full day
  - CATS and CCT don't cross county borders so you couldn't commute from Cherokee to Cobb County or vice versa

- Some government buildings don't have automatic doors or clearly accessible ramps
- Cherokee County does a good job on the amount of development very clean with desirable retail locations
- 10) Is there anything we haven't discussed that you feel is important to our research?
  - Politicians and government don't seem to see affordable housing as a need in Cherokee County
  - Development pressure and people moving north into Cherokee County are not sensitive to the needs of many long-time residents who have more moderate incomes
  - There are no shelters in the county; is a need for an emergency shelter
  - Need for transitional housing for the homeless and rapid rehousing; even when people have jobs they may have trouble making the deposit to move in somewhere
  - Housing Authority has a long waiting list for units and there are not enough affordable housing units for seniors or young people; people are being priced out of where they live

#### **Stakeholder Interviews**

- 1) What do you believe are the greatest fair housing needs or affordable housing needs in the community? Are there parts of the county that are particularly affected?
  - Affordable housing is hard to find; rents have increased 15% year over year in Cherokee, displacing seniors and others on fixed incomes
  - Affordable, accessible housing
  - Senior housing is a huge need; not as many resources for seniors and affordable housing as other cities/counties have; need efficiency senior units with a communal kitchen that serves meals
  - All housing being built is pretty expensive, even things being marketed as affordable
  - It would be helpful to know what affordability levels are within the cities in Cherokee County because there doesn't seem to be a common understanding of affordability and what price levels that translates to
  - People are living in hotels weekly but can't get ahead enough to save a deposit for a lowercost rental unit
  - Need has increased as population has grown and county has become less rural and more suburban
  - There are too few apartment complexes that accept vouchers
- 2) What are Cherokee County's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
  - Canton because of access to transportation
  - Woodstock because of access to jobs
  - Towne Lake and Hickory Flat because they have good schools
  - Holly Springs
  - Anywhere on the south side of the county
  - Accessibility to jobs (other than low-wage jobs) is important

- 3) Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might limit housing choices?
  - Yes, same range of options if they can afford the same choices
  - General sense that there would be some differences in choice between African Americans and whites and Latinos and whites
  - No, seniors and people with disabilities would have limited selection if they are looking for single-story or ground-floor units; ranches sell very quickly
- 4) Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
  - There is a small historically African American community in Canton called Pea Ridge
  - Clusters of Latino residents in Canton
  - There are some clusters of low-income households in Canton due to availability of transit
  - When CHA recently opened its wait list, resulted in more diversity in their apartment complexes
  - Does not think that Cherokee County is segregated, other than that population density is higher in some places than others
- 5) Are you aware of any housing discrimination that occurs in the county? What are some things that can be done to overcome discrimination?
  - Has not heard much about discrimination being a problem
  - Not aware of any
- 6) Is there an adequate supply of housing that is accessible to people with disabilities?
  - Apartments are not all ADA compliant
  - Continued need for home modifications through the Council on Aging and Habitat for Humanity
  - There are lots of senior living properties being built but none are affordable; need an affordable memory care facility
  - No adaptive sports program or parks designed for adaptive use
  - No sidewalks in many places
- 7) What types of fair housing services are offered in the county? Who provides these services? Are these services effective? How well are they coordinated with the work of other organizations in the community?
  - Several interviewees were not aware of fair housing resources in the county
  - Legal Aid, although they focus more on landlord/tenant issues
  - Canton Housing Authority
  - Renters are afraid to complain about landlords or housing conditions out of fear of eviction/ retaliation

- 8) Are public resources (e.g., parks, schools, roads, police & fires services, etc.) invested in evenly throughout all parts of the county?
  - Yes, pretty even unless you live in a very rural area
  - CATS does not connect residents to job centers
  - Last two parks were opened in underserved areas
  - There is a need to look at community-wide issues and more actively pursue grants to help Cherokee County residents
- 9) Is there anything we haven't discussed that you feel is important to our research?
  - The County needs more planning related to housing affordability and homelessness; doesn't acknowledge that affordable housing is an issue
  - Affordable housing should be linked with transit and more integrated into other development
  - Development in Cherokee County is predominantly geared toward upper-middle class
  - TBRA is a good solution but the County would need another funding source now that the HOME Consortium disbanded
  - Only high-density multifamily developments that get approval are senior developments, although there are some higher-density developments in Holly Springs
  - CHA applied for a ROSS grant that would help with education and other needs to enhance opportunities for residents

#### **Community Survey**

The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

- When asked to identify housing needs in Cherokee County, about two-thirds of respondents said that "some" or "a lot" more housing that people with lower incomes can afford (66.67%) is needed. Two-thirds also said that "some" or "a lot" more assistance for first time homebuyers is needed (65.22%). About half of respondents identified the need for "some" or "a lot" more housing for people with disabilities (54.17%) and housing that accepts Section 8 vouchers (52.17%).
- Thinking about the provision of public services in Cherokee County, more than half of respondents indicated that schools, grocery stores and other shopping, banking and lending, garbage collection, and fire and police protection are equally provided in all parts of the county. Resources that were most commonly perceived as not being equally provided include bus service (identified as unequally provided by 40.91% of respondents), roads and sidewalks (42.86%), parks and trails (38.10%), and property maintenance (38.10%).
- Two-fifths of respondents (40.91%) report understanding their fair housing rights and knowing where to file a housing discrimination complaint. Half of respondents (50.00%) say they do not know their fair housing rights or where to file a housing discrimination complaint.
- Six respondents experienced housing discrimination since living in Cherokee County. Landlords or property managers were the most frequent discriminators, impacting 4 out of the 6

respondents (66.67%) who experienced housing discrimination, followed by real estate agents (1 out of 6 respondents) and city or county staff (also 1 out of 6 respondents). The most frequent bases for discrimination were familial status (2 out of 6 cases) and race (also 2 out of 6 cases).

- Of the 6 survey participants who experienced discrimination, 3 filed a report of it. Common reasons for not filing included not knowing what good it would do (all 3 cases) and not knowing where to file (2 responses).
- Survey participants were asked whether they think housing discrimination is an issue in Cherokee County. A little less than one-third of respondents said yes (29.17%), and another 29.17% said no. The remaining 41.67% either did not know or felt it may be an issue.
- Asked to select any factors that are barriers to fair housing in Cherokee County, respondents identified the following as the top three impediments to fair housing:
  - Not enough affordable rental housing for large families (64.71%);
  - O Displacement of residents due to rising housing costs (58.82%); and
  - o Community opposition to affordable housing (58.82%).

# IV. Assessment of Past Goals, Actions & Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents. Discuss what progress has been made toward the achievement of fair housing goals.

Cherokee County completed an Analysis of Impediments to Fair Housing Choice in 2010, which identified 10 impediments. For each impediment, the AI outlined recommendations to address it. These recommendations are listed below, along with progress made toward their achievement over the last seven years.

#### Impediment #1: Limited Supply of Affordable Housing

#### Recommendations

- Increase the preservation of existing housing by rehabilitating deteriorating housing
- Strengthen and assist non-profit and private developers such as Habitat for Humanity or Low-Income Housing Tax Credit developers
- Seek additional resources for the development of affordable housing
- Provide technical assistance to local organizations developing affordable housing
- Develop better community education regarding the need for and value of affordable housing
- Seek out public-private partnerships to develop affordable housing

#### **Progress toward Achievement**

- Assisted Habitat for Humanity acquire over 20 lots for development of low and moderate income homeownership housing using CDBG and HOME funds
- Provided emergency home repairs through Habitat for Humanity for low and moderate income households
- Assisted MUST Ministries in the acquisition and rehabilitation of scattered site housing for homeless individuals and families
- Used HOME funds through Georgia Urban County Consortium to rehabilitate homes for seniors

#### Impediment #2: Banking Practices that Limit Fair Housing Choice

#### Recommendations

- Monitor HMDA data to identify any unusual lending patterns and refer possible violations to the Georgia Commission on Equal Opportunity
- Encourage corrective actions by lenders and other agencies when deficiencies in lending are identified
- Engage local banking representatives in a review of lending policies and practices

#### **Progress toward Achievement**

• The County has not yet completed any activities related to this recommendation since the impediment was identified in 2010.

# Impediment #3: Housing Brokerage Policies, Procedures, and Practices that Restrict Fair Housing Choice

#### Recommendations

- Review local broker training provided by the area association of realtors
- Consider whether testing is needed to assess local brokerage practices

#### **Progress toward Achievement**

• The County has not yet completed any activities related to this recommendation since the impediment was identified in 2010.

# Impediment #4: Property Insurance Policies, Procedures, and Practices that Restrict Fair Housing Choice

#### **Recommendations**

- Encourage nonprofit and community organizations that are aware of higher home insurance requirements for householders with lower credit ratings to report this information with CDBG staff
- Share information on insurance rates with organizations that work with low and moderate income homeowners

#### **Progress toward Achievement**

• The County has not yet completed any activities related to this recommendation since the impediment was identified in 2010.

#### **Impediment #5: Discriminatory Tenant Selection in Rental Housing**

#### Recommendations

Establish a local review process for monitoring fair housing issues with representation from a
cross-section of local interests, including minority-based organizations, non-profit service
organizations, housing authorities, lending institutions, real estate agents, and others

#### **Progress toward Achievement**

 The County has not yet completed any activities related to this recommendation since the impediment was identified in 2010.

#### Impediment #6: Zoning Laws, Building Codes, Fees, and Taxes Which Limit Housing Options

#### Recommendations

- Consider leaving reduced building fees in place for developers and builders whose developments include affordable and accessible housing
- Strive to include representatives of minority and special needs populations on planning and zoning boards

#### **Progress toward Achievement**

 Updated the zoning code to permit small personal care homes for up to 6 "ambulatory" individuals in all residential districts

# Impediment #7: Limited Number, Location, and/or Types of Housing Accessible to Persons with Physical or Other Disabilities

#### Recommendations

• Include incentives in the County's housing plan for adequate numbers of housing units that incorporate practices which accommodate people with disabilities

#### **Progress toward Achievement**

• The County has not yet completed any activities related to this recommendation since the impediment was identified in 2010.

#### **Impediment #8: Neighborhood Environment Impediments**

#### **Recommendations**

- Improve deteriorated neighborhoods, making existing affordable housing a better choice for low and moderate income housing and making these neighborhoods safer
- Work with CATS staff to review traffic patterns and transit routes to evaluate the need for additional services, especially in low and moderate income neighborhoods

#### **Progress toward Achievement**

- Used CDBG funding to improve water/sewer, stormwater, and streetscape infrastructure in low and moderate income areas in Canton, Woodstock, and Holly Springs
- Provided transportation assistance for Boys and Girls Club attendees and for senior citizens in Woodstock

#### **Impediment #9: Economic Impediments**

#### Recommendations

 Explore methods of increasing economic opportunity for low and moderate income residents, such as job training, skills development, and workshops for people with disabilities

#### **Progress toward Achievement**

- The County used CDBG funding to support staff positions for MUST Ministries' supportive housing program that assists clients in obtaining stable housing, mainstream benefits, medical care and employment.
- The County funded a therapeutic day program staff position to improve services provided to disabled clients. The program allows disabled children who have aged out of the school system to be further educated and cared for so that both parents can work. The success of the program improved the services to disabled clients with higher cognitive abilities to benefit from educational programs as well.

#### Impediment #10: Lack of Information on Fair Housing Issues

#### **Recommendations**

- Seek out local community groups interested in promoting community education on fair housing issues and help them develop a sustained public education approach
- Develop fair housing educational materials
- Hold a countywide fair housing forum to generate interest in fair and affordable housing
- Work with local nonprofits to strengthen financial education programs that help potential borrowers prepare for homeownership

#### **Progress toward Achievement**

• The County has not yet completed any activities related to this recommendation since the impediment was identified in 2010.

## V. Fair Housing Analysis

#### A. Demographic Summary

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

Cherokee County has a population of about 230,000 residents according to the 2012-2016 Five-Year American Community Survey. Three racial and ethnic groups make up the large majority of the county's population: non-Latino whites (81.34%), Latinos (9.57%) and non-Latino African Americans (5.41%) (Table 1). These groups also make up the largest shares of residents in the region, although at different proportions. Whites comprise 50.78% of the Atlanta-Sandy Springs-Roswell region, African Americans constitute 31.86%, and Latinos make up10.36%.

Most other groups make up similar shares at the county and regional level, with the exception of Asians or Pacific Islanders, who are 4.82% of the regional population but only 1.66% of the population in Cherokee County.

Current estimates show that 8.75% of Cherokee County's population is foreign-born and 4.70% of the population has limited English proficiency (LEP) (Table 2). Most of the foreign-born population are from either Mexico or Guatemala (7,290 residents). Other common countries of origin include India, Ukraine, Colombia, and Canada. By far, most residents with limited English proficiency speak Spanish (8,055 residents); Vietnamese, Chinese, and Persian are also common languages for the LEP population.

The Atlanta-Sandy Springs-Roswell region is more diverse than Cherokee County in terms of national origin and language. About one-in-seven residents in the region was born outside of the U.S. (13.64%) and 7.05% have limited English proficiency. As in Cherokee County, the largest shares of foreignborn residents are from Central American (Mexico, Guatemala, El Salvador, and Colombia) and most residents with limited English proficiency speak Spanish.

Table 2 provides demographic trends since 1990 using the decennial Census and American Community Survey. Since 1990, Cherokee County's population more than doubled, growing from about 90,000 to over 200,000 residents. Looking at population change by racial and ethnic group shows that several groups saw considerable growth over the last two decades. Cherokee County's Latino population grew by about 20 times its 1990 population, from 1,048 residents to 20,578. The number of African American residents increased by a factor of 6, from 1,685 in 1990 to 11,642 as of current ACS estimates. The Asian population expanded from 291 residents to over 3,500. The non-Latino white population doubled since 1990, adding 87,703 residents.

As Cherokee County became more diverse, the white population share from 96.30% in 1990 to 81.34%. Latino residents, who comprised only 1.16% of the population in 1990, currently make up about one-tenth of the county. African Americans also increased as a share of total population, from 1.86% in 1990 to 5.41% at present. Like Cherokee County, the region also became increasingly diverse over the last two decades, with largest growth rates in the Latino, Asian, and African American population segments.

		Table 1. Demogra	phics			
Dago /Ethnigity		Cherokee County		Atlanta-San	dy Springs-Roswell I	Region
Race/Ethnicity		#	%		#	%
Non-Hispanic						
White		174,904	81.34%		2,684,570	50.78%
Black		11,642	5.41%		1,684,178	31.86%
Asian or Pacific Islander		3,570	1.66%		254,691	4.82%
Native American		538	0.25%		10,779	0.20%
Two or More Races		3,321	1.54%		90,866	1.72%
Other		487	0.23%		13,749	0.26%
Hispanic		20,578	9.57%		547,894	10.36%
National Origin						
#1 country of origin	Mexico	6,059	2.97%	Mexico	174,014	3.48%
#2 country of origin	Guatemala	1,231	0.60%	India	50,770	1.02%
#3 country of origin	India	692	0.34%	Korea	34,848	0.70%
#4 country of origin	Ukraine	677	0.33%	Jamaica	34,108	0.68%
#5 country of origin	Colombia	633	0.31%	Vietnam	28,037	0.56%
#6 country of origin	Canada	596	0.29%	China	21,114	0.42%
#7 country of origin	England	468	0.23%	El Salvador	19,166	0.38%
#8 country of origin	Vietnam	433	0.21%	Guatemala	18,337	0.37%
#9 country of origin	Iran	419	0.21%	Colombia	16,109	0.32%
#10 country of origin	Venezuela	388	0.19%	Nigeria	15,061	0.30%
Limited English Proficiency (LEP) La						
#1 LEP Language	Spanish	8,055	3.95%	Spanish	224,781	4.49%
#2 LEP Language	Vietnamese	290	0.14%	Korean	21,996	0.44%
#3 LEP Language	Chinese	278	0.14%	Vietnamese	21,665	0.43%
#4 LEP Language	Persian	230	0.11%	Chinese	17,726	0.35%

	Demog	raphics (conti	nued)			
	Cherokee County Atlanta-Sandy Springs-Roswell F					
Limited English Proficiency (LEP)	Language	#	%	Language	#	%
#5 LEP Language	Russian	189	0.09%	African	11,988	0.24%
#6 LEP Language	Laotian	170	0.08%	Other Indic Language	6,935	0.14%
#7 LEP Language	Other Slavic Language	169	0.08%	Other Asian Language	6,903	0.14%
#8 LEP Language	Gujarati	94	0.05%	French	6,038	0.12%
#9 LEP Language	African	63	0.03%	French Creole	5,082	0.10%
#10 LEP Language	Japanese	63	0.03%	Russian	5,051	0.10%
Disability Type						
Hearing difficulty		6,515	3.21%		124,237	2.51%
Vision difficulty		3,992	1.97%		96,741	1.95%
Cognitive difficulty		7,696	3.79%		195,085	3.94%
Ambulatory difficulty		10,932	5.39%		273,305	5.52%
Self-care difficulty		3,876	1.91%		101,952	2.06%
Independent living difficulty		7,431	3.66%		185,645	3.75%
Sex						
Male		106,218	49.39%		2,572,523	48.66%
Female		108,822	50.61%		2,714,205	51.34%
Age						
Under 18		59,094	27.48%		1,400,791	26.50%
18-64		136,159	63.32%		3,411,410	64.53%
65+		19,788	9.20%		474,527	8.98%
Family Type						
Families with children		29,057	50.04%		662,976	49.99%

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

Data Sources: Decennial Census; ACS

Table 2. Demographic Trends										
		Cherokee County								
Race/Ethnicity	199	1990		2000		2010		Current		
	#	%	#	%	#	%	#	%		
White, Non-Hispanic	87,201	96.30%	128,202	89.94%	174,904	81.34%	174,904	81.34%		
Black, Non-Hispanic	1,685	1.86%	3,782	2.65%	13,125	6.10%	11,642	5.41%		
Hispanic	1,048	1.16%	7,692	5.40%	20,578	9.57%	20,578	9.57%		
Asian or Pacific Islander, Non-Hispanic	291	0.32%	1,472	1.03%	4,568	2.12%	3,570	1.66%		
Native American, Non-Hispanic	234	0.26%	998	0.70%	1,279	0.59%	538	0.25%		
National Origin										
Foreign-born	1,419	1.57%	8,287	5.81%	17,353	8.07%	18,808	8.75%		
LEP										
Limited English proficiency	613	0.68%	4,981	3.49%	8,911	4.14%	10,103	4.70%		
Sex										
Male	45,437	50.18%	71,538	50.19%	106,218	49.39%	106,218	49.39%		
Female	45,104	49.82%	70,989	49.81%	108,822	50.61%	108,822	50.61%		
Age										
Under 18	25,384	28.04%	40,981	28.75%	59,094	27.48%	59,094	27.48%		
18-64	58,759	64.90%	92,134	64.64%	136,159	63.32%	136,159	63.32%		
65+	6,397	7.07%	9,412	6.60%	19,788	9.20%	19,788	9.20%		
Family Type										
Families with children	13,891	53.15%	15,016	51.93%	29,057	50.04%	29,057	50.04%		

Table 2. Demographic Trends (continued)										
		Atlanta-Sandy Springs-Roswell Region								
Race/Ethnicity	1990		2000		2010		Current			
	#	%	#	%	#	%	#	%		
White, Non-Hispanic	2,190,381	71.05%	2,575,783	60.41%	2,684,571	50.78%	2,684,570	50.78%		
Black, Non-Hispanic	774,022	25.11%	1,234,307	28.95%	1,737,348	32.86%	1,684,178	31.86%		
Hispanic	58,434	1.90%	270,338	6.34%	547,894	10.36%	547,894	10.36%		
Asian or Pacific Islander, Non-Hispanic	50,607	1.64%	148,647	3.49%	278,025	5.26%	254,691	4.82%		
Native American, Non-Hispanic	5,236	0.17%	17,724	0.42%	23,199	0.44%	10,779	0.20%		
National Origin										
Foreign-born	117,366	3.81%	424,683	9.96%	689,787	13.05%	720,964	13.64%		
LEP										
Limited English proficiency	64,104	2.08%	259,330	6.08%	365,963	6.92%	372,588	7.05%		
Sex										
Male	1,498,953	48.63%	2,102,082	49.30%	2,572,523	48.66%	2,572,523	48.66%		
Female	1,583,361	51.37%	2,161,363	50.70%	2,714,205	51.34%	2,714,205	51.34%		
Age										
Under 18	803,108	26.07%	1,163,223	27.28%	1,400,791	26.50%	1,400,791	26.50%		
18-64	2,025,561	65.76%	2,770,277	64.98%	3,411,410	64.53%	3,411,410	64.53%		
65+	251,559	8.17%	329,945	7.74%	474,527	8.98%	474,527	8.98%		
Family Type										
Families with children	415,234	50.79%	363,160	50.87%	662,976	49.99%	662,976	49.99%		

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

Data Sources: Decennial Census; ACS

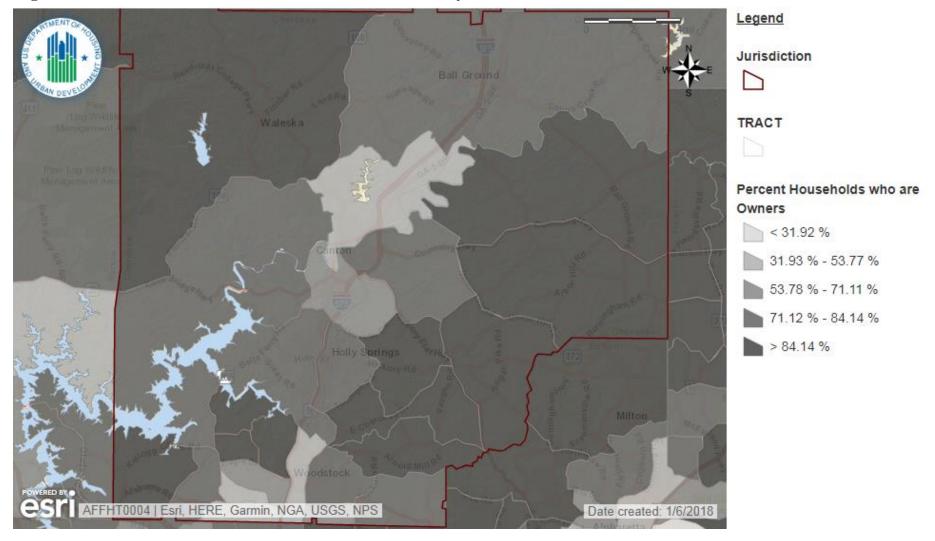
# 2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

According to the 2012-2016 Five-Year American Community Survey, 77.25% of households in Cherokee County own their homes, down from 83.85% in 2000. Rental households make up 22.75% of the county, up from 16.15% in 2000. The homeownership rate is lower in the Atlanta-Sandy Springs-Roswell region, where only 63.00% of households own their homes as the 2012-2016 American Community Survey.

The maps that follow show the share of owners and renters by census tract in Cherokee County. Homeownership is most prevalent in the eastern side of the county, where it ranges from 87.82% to 96.7% in the six tracts that cover Lathemtown, Free Home, Hickory Flat, and Buffington (Figure 1). Waleska and the northwestern portion of the county also have a high homeownership rate at 84.25%.

Rental housing is most common in northern Canton (57.42%), southwestern Canton (43.46%), and two contiguous tracts in and near Woodstock on the county's southern border (53.00% and 48.88% rental).

Figure 1. Share of Households that are Owners in Cherokee County



Legend Jurisdiction TRACT Percent Households who are Renters < 15.79 % 15.80 % - 28.72 % 28.73 % - 45.85 % 45.86 % - 67.80 % > 67.80 % Holly Springs AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/7/2018

Figure 2. Share of Households that are Renters in Cherokee County

#### B. General Issues

#### i. Segregation/Integration

#### 1. Analysis

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

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of majority members that would have to change their area of residence to achieve a distribution matching that of the majority, or vice versa.

The table below shares the dissimilarity indices for four pairing in Cherokee County and the Atlanta-Sandy Springs-Roswell region. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The "current" figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that rely on census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations. A study of the effect of using census block groups instead of tracts to examine housing patterns in 331 metropolitan areas throughout the U.S. indicated that index scores were modestly higher when using block groups, by an average of 3.3 points for all metro area dissimilarity scores.¹ The assessment below relies on the "current" 2010 figure (calculated using block groups) while the trend analysis in part (c) will use the indices developed at the census tract level.

As of 2010, segregation levels in the county were low (under 40) for all of the pairings examined. They ranged from a DI of 30.22 for Asian and white residents to a DI of 35.48 for Latino and white residents.

In contrast, dissimilarity indices at the regional level show a high degree of segregation amongst African American and white residents (DI = 61.43) and moderate levels of segregation in each of the other pairings, with DIs ranging from 51.37 for Asian and white residents to 53.82 for white

<sup>1</sup> Iceland, John, and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit\_of\_analysis.pdf.

and non-white residents. Although there are low levels of segregation within Cherokee County, it is considerably less diverse than the Atlanta region as a whole (as shown in Table 1), and this difference in racial and ethnic composition contributes to the elevated segregation levels at the regional scale.

Table 3. Racial/Ethnic Dissimilarity Trends										
Dogo/Ethnicity	Cherokee County				Atlanta	_	Springs gion	Roswell		
Race/Ethnicity Dissimilarity Index	Trends			Current		Trends				
	1990	2000	2010	(2010)	1990	2000	2010	(2010)		
Non-White/White	30.91	28.85	26.35	32.03	59.99	56.14	50.51	53.82		
Black/White	52.32	30.65	26.78	32.24	66.06	63.75	58.25	61.43		
Hispanic/White	17.54	34.79	32.27	35.48	35.48	51.62	49.48	52.62		
Asian or Pacific Islander/White	32.38	26.10	24.85	30.22	42.92	45.51	46.39	51.37		

Data Sources: Decennial Census

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

The maps that follow identify population by race and ethnicity by census tract in Cherokee County. They also include maps that identify foreign-born populations and people with limited English proficiency by census tract.

Looking first at segregation and integration by race and ethnicity, the map shows that the most integrated areas in Cherokee County are along the county's southwestern border. In the three census tracts in that area, the predominant groups living there include white (62-70% of total tract population), African Americans (9-13%), and Latinos (16-24%). Three tracts in Canton are also relatively diverse, with white populations ranging from 66-72%, Blacks from 5-9%, and Latinos from 18-23%.

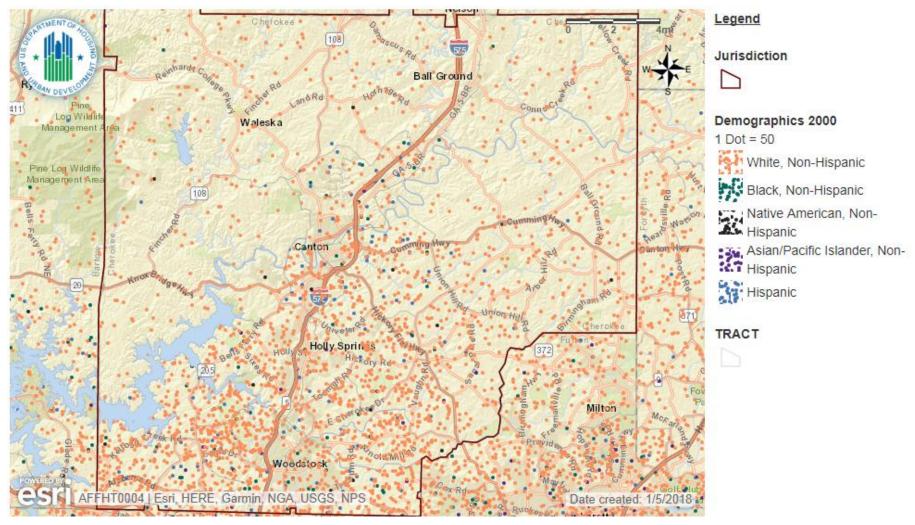
The most segregated parts of the county include Waleska, Ball Ground, and Free Home and the unincorporated areas in northern and eastern Cherokee County. In these areas, white residents constitute more than 90% of the population, and African Americans and Latinos each make up less than 5% of the population.

The majority of Cherokee County's foreign-born population lives in Canton. Together Mexican and Guatemalan immigrants constitute 20% of the census tract that covers northern Canton, and 6 and 13% of the remaining two tracts in Canton. Outside of Canton, Woodstock, and southern Cherokee County, there are few immigrants in the rest of the county including its western, northern, and eastern portions. Residential patterns for people with limited English proficiency are almost identical, with concentrations in Canton, Woodstock, and southern Cherokee County.

Legend Jurisdiction Ball Ground Pine Log Wildlife Demographics 2010 ·Waleska Management 1 Dot = 50 White, Non-Hispanic Pine Log Wildlife Management Area Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic Holly Springs TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS,

Figure 3. Population by Race and Ethnicity in Cherokee County, 2010

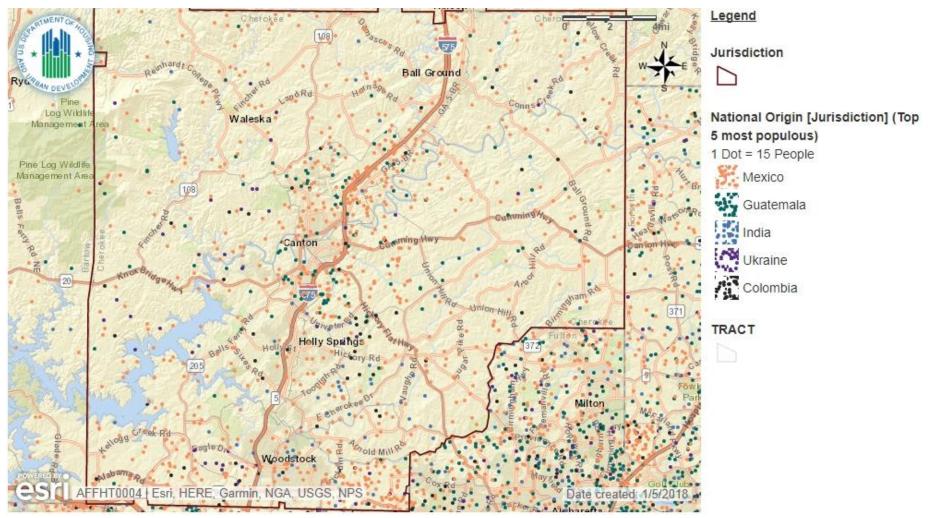
Figure 4. Population by Race and Ethnicity in Cherokee County, 2000



Legend · Cherokee Jurisdiction Ball Ground Log Wildlife Management A Demographics 1990 Waleska 1 Dot = 50 White, Non-Hispanic Pine log Wildlife Management Area Black, Non-Hispanic Native American, Non-Hispanic Canton Asian/Pacific Islander, Non-Hispanic Hispanic TRACT Holly Springs Milton Woodstock AFFHT0004 LEsri, HERE, Garmin, NGA, USGS, NPS Date created: 1/5/2018 is

Figure 5. Population by Race and Ethnicity in Cherokee County, 1990

Figure 6. Foreign-Born Population by Nationality in Cherokee County



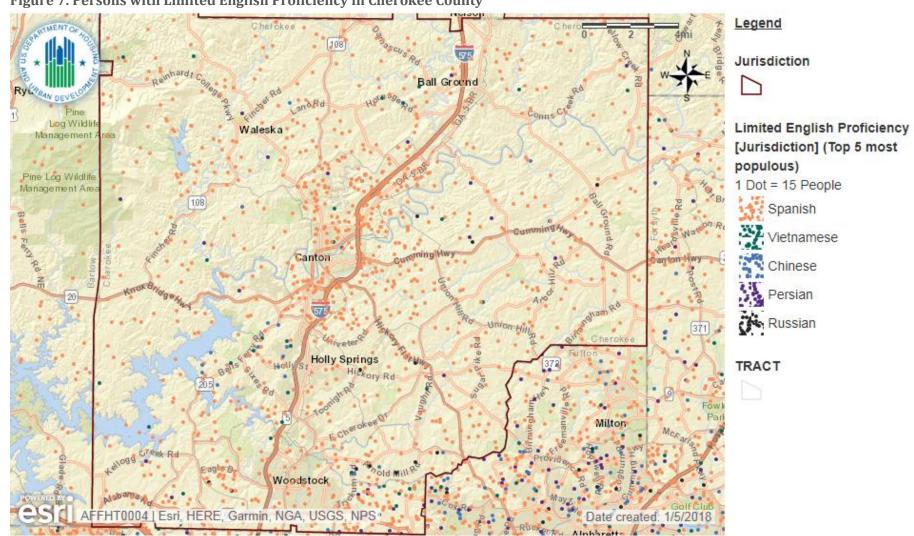


Figure 7. Persons with Limited English Proficiency in Cherokee County

# c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

This examination of segregation levels over time relies on dissimilarity indices calculated from tract level data from the 1990, 2000, and 2010 census, as provided in Table 3. In Cherokee County, segregation levels fell for three pairings from 1990 to 2000 and 2000 to 2010. Most notably, the dissimilarity index between white and African American residents declined by 25.54 points over the two decades, from 52.32 in 1990 to 26.78 in 2010. Segregation between Asian/Pacific Islanders and white residents also declined (by 7.53 points), as did segregation between whites and non-white residents (by 4.56 points).

In contrast to the preceding pairings, segregation levels between Latino and white residents in Cherokee County are nearly double what they were two decades ago. In 1990, when Latinos made up only 1.16% of the county's population, segregation was very low with at DI of 17.54. By 2000, Latinos made up 5.40% of county's population, and the DI value grew to 34.79. The county's foreign-born population also expanded over this decade, from 1.57% in 1990 to 5.81% in 2000. Given that the largest shares of Cherokee County's foreign-born population are from Mexico, Guatemala, and Colombia, many of the county's new Latino residents were likely also foreign-born. If these new Latino residents behaved as many growing minority groups do, they would have moved into areas of the county predominately settled by people of their own ethnicity (in this case, the Canton area). The present data strongly suggests that the adoption of 7 times as many Latino residents as the 1990 population occurred in proximate areas. The expansion of existing Latino clusters was likely a significant force in increasing the dissimilarity index between 1990 and 2000. This conclusion does not mean that there was no housing discrimination against Latinos, but the substantial population growth masks less visible discriminatory dynamics.

The metro Atlanta region saw a similar spike in segregation between Latino and white residents between 1990 and 2000, when the DI grew from 35.48 to 51.62, ultimately stabilizing at 49.48 by 2010. Segregation amongst whites and Asians/Pacific Islanders also increased in the region, from 42.92 in 1990 to 46.39 in 2010. The remaining two pairings – African American and white residents and white and non-white residents – saw declines in segregation over the last two decades. While African American/white segregation remains high, it declined from 66.06 in 1990 to 58.25 in 2010. White/non-white segregation moved from a high level in 1990 (DI = 59.99) to a moderate level in 2010 (DI = 50.51).

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

Generally, the areas in Cherokee County where rental housing is most common are also areas that are among the most integrated in the county. The highest share of renters is in northern Canton, where 57.42% of households rent their homes; this tract also has a population that is 23% Latino, 9% African American, and over 15% foreign-born. Rental housing is also common in a Woodstock tract (53.00%) where African Americans make up 13% of the population and Latinos constitute 11%. Other diverse areas with high shares of rental households include southwest Canton where 43.46% of households rent and a census tract in southwest Cherokee County where 48.88% of households do.

Although most areas with a preponderance of rental housing are integrated, there are also several integrated areas where the homeownership rate is relatively high, including tracts in Woodstock, Canton, and along the southwestern edge of the county.

Eastern Cherokee County has the highest homeownership rates, typically greater than 90%, and is also one of the most segregated parts of the county.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

While Cherokee County's population became more diverse over the last two decades, dissimilarity indices indicate that most racial and ethnic groups are generally less segregated from one another in 2010 than they were in 1990. Segregation levels between Latino and white residents are an exception; they increased from 1990 to 2000 as the Latino population expanded. Segregation between these groups stabilized between 2000 and 2010 even as the population continued to grow. While trends suggest that this value would remain stable or decline as existing Latino residents move to new areas of the county, another decade of strong growth, particularly among foreign-born Latino population segments, would have the potential to lead to higher segregation by 2020.

#### 2. Additional Information

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

No local data sources provide any additional information about segregation for other protected classes in Cherokee County.

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

Through the CDBG program, Cherokee County makes place-based investments in low and moderate income areas of the county. Over the current consolidated planning cycle, the County has invested in infrastructure projects to address aging water and sewer lines and improve stormwater management and streetscaping in low and moderate income neighborhoods in Canton, Woodstock and Holly Springs; provided transportation assistance and facilities improvements for the Boys and Girls Club in Canton; provided transportation assistance for seniors in Woodstock; and funded support staff to increase capacity to provide low-cost medical services at the Bethesda Community Health Clinic in Canton.

The Canton Housing Authority administers does not currently offer any mobility programs.

#### 3. Contributing Factors of Segregation

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

### **Priority Contributing Factors:**

- Availability of affordable units throughout the county
- Continued need for community revitalization
- Private discrimination

## **Non-Priority Contributing Factors:**

- Community opposition
- Lack of regional cooperation
- Availability, type, frequency, and reliability of public transportation

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

#### 1. Analysis

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

HUD developed a methodology that combines demographic and economic indicators to identify areas it classifies as racially and ethnically concentrated areas of poverty (R/ECAPs). HUD defines a R/ECAP as a census tract that has an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more.

There are no census tracts in Cherokee County that meet HUD's R/ECAP definition.

In the Atlanta-Sandy Springs-Roswell region, R/ECAP tracts are concentrated in Fulton County, including East Point, Hapeville, College Park, and the south and southwest portions of Atlanta. Other areas in the region with one or more R/ECAPs include Marietta, Carrollton, Griffin, Norcross, Forest Park, Scottdale, Clarkston, and unincorporated parts of Dekalb County along I-285, I-20, and I-85.

# b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

No Cherokee County residents live within R/ECAP census tracts.

Regionally, 191,188 residents live in an R/ECAP, or about 4% of the population (Table 4). African Americans are disproportionately more likely to reside in an R/ECAP than other racial and ethnic groups. African Americans make up 68.98% of the region's R/ECAP population compared to their 31.86% share of the region's population overall. Latinos constitute 13.88% of the region's R/ECAP residents compared to a 10.36% share of the overall region's population. African Americans are 9.5 times more like than whites to live in an R/ECAP; Latinos are 5.9 times more likely than whites to live in an R/ECAP.

Several foreign-born groups in the region are disproportionately likely to reside in an R/ECAP tract, including those born in Mexico, Burma, Ethiopia, Vietnam, Honduras, and El Salvador.

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

There were no R/ECAPs in Cherokee County in 1990 or 2000.

Regionally, the location of R/ECAPs have been relatively stable since 1990, although there has been some suburban expansion. In 1990, regional R/ECAPs were located in Marietta, Atlanta, East Point, College Park, Hapeville, and Scottdale. By 2000, an R/ECAP also formed in Carrollton.

Table 4. R/ECAP Demographics										
D /ECAD Dago /Ethysisia	Cherokee County			Atlanta-Sandy Springs-Roswell Region						
R/ECAP Race/Ethnicity			%		#	%				
Total population in R/ECAPs		0	-		191,188	-				
White, Non-Hispanic		0	N/a		22,209	11.62%				
Black, Non-Hispanic		0	N/a		131,884	68.98%				
Hispanic		0	N/a		26,529	13.88%				
Asian or Pacific Islander, Non-Hispanic		0	N/a		6,891	3.60%				
Native American, Non-Hispanic		0	N/a		404	0.21%				
Other, Non-Hispanic		0	N/a		337	0.18%				
R/ECAP Family Type	#		%		#	%				
Total families in R/ECAPs		0	-		37,816	-				
Families with children		0	N/a		19,445	51.42%				
	#		%	Country	#	%				
Total population in R/ECAPs		0	-		191,188	-				
#1 country of origin		0	0.00%	Mexico	10,598	5.54%				
#2 country of origin		0	0.00%	Burma	1,594	0.83%				
#3 country of origin		0	0.00%	Ethiopia	1,307	0.68%				
#4 country of origin		0	0.00%	Vietnam	1,266	0.66%				
#5 country of origin		0	0.00%	Honduras	1,211	0.63%				
#6 country of origin		0	0.00%	Other South Central Asia	1,105	0.58%				
#7 country of origin		0	0.00%	El Salvador	986	0.52%				
#8 country of origin		0	0.00%	India	908	0.47%				
#9 country of origin		0	0.00%	Other Eastern Africa	693	0.36%				
#10 country of origin		0	0.00%	Guatemala	668	0.35%				

Note: The most populous groups at the city and region levels may not be the same, and are thus labeled separately.

Source: Decennial Census; ACS

#### 2. Additional Information

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

Beyond the HUD-provided data, Cherokee County does not have any additional data about protected classes living in R/ECAPs within the Atlanta region.

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

Cherokee County does not contain any R/ECAP census tracts.

## 3. Contributing Factors of R/ECAPs

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

Not applicable; Cherokee County does not contain any R/ECAP census tracts.

### iii. Disparities in Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors such as access to quality schools, jobs, and transit. Housing market conditions, local policies and practices, and other factors that lead to disparate levels of access to these and other resources based on protected class have important implications for fair housing.

To measure economic, environmental, and educational conditions at a neighborhood level, HUD developed a methodology that quantifies the degree to which an area provides such opportunities. For each census block group in the U.S., HUD provides a score on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, job proximity, transportation costs and transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics. Average index values by race, ethnicity, and poverty status for Cherokee County, and the Atlanta-Sandy Springs-Roswell Region are provided in the table that follows. These values can be used to assess whether some population subgroups live, on average, in higher opportunity areas than others.

Table 5. Opportunity Indicators by Race/Ethnicity												
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index					
<b>Cherokee County Total Population</b>												
White, Non-Hispanic	62.55	66.14	64.65	53.09	28.71	47.32	46.34					
Black, Non-Hispanic	58.49	65.77	61.99	59.59	33.55	52.23	42.67					
Hispanic	52.98	61.11	56.47	58.07	34.30	56.23	43.66					
Asian or Pacific Islander, Non-Hispanic	65.06	69.18	68.30	60.13	31.46	47.98	42.03					
Native American, Non-Hispanic	57.28	62.93	59.19	53.36	30.91	52.77	46.04					
Cherokee County Population Below Federal Poverty Line												
White, Non-Hispanic	57.00	62.87	58.32	53.98	31.67	51.89	45.02					
Black, Non-Hispanic	49.02	58.73	54.43	57.02	34.93	62.79	43.27					
Hispanic	43.33	52.66	46.29	57.00	37.07	61.85	47.53					
Asian or Pacific Islander, Non-Hispanic	63.76	71.38	67.08	60.54	31.26	48.64	46.56					
Native American, Non-Hispanic	54.82	66.63	59.96	59.77	31.58	58.19	42.40					
Atlanta-Sandy Springs-Roswell Region Total Population												
White, Non-Hispanic	59.35	66.64	61.52	58.30	34.86	50.04	36.21					
Black, Non-Hispanic	38.43	37.56	41.61	68.30	43.71	45.96	25.33					
Hispanic	38.88	54.39	51.53	70.82	48.30	52.25	27.32					
Asian or Pacific Islander, Non-Hispanic	57.60	66.92	66.71	71.05	45.34	54.69	27.81					
Native American, Non-Hispanic	48.54	54.84	52.00	61.84	39.04	50.20	32.01					
Atlanta-Sandy Springs-Roswell Region Population Below Federal Poverty Line												
White, Non-Hispanic	47.46	59.59	49.82	57.16	36.88	50.47	36.30					
Black, Non-Hispanic	27.64	31.89	33.26	71.42	48.93	47.60	23.24					
Hispanic	28.15	49.46	45.56	73.77	52.50	53.18	25.02					
Asian or Pacific Islander, Non-Hispanic	48.37	58.72	59.53	74.51	52.73	56.83	23.94					
Native American, Non-Hispanic	37.79	50.61	43.25	63.50	42.33	54.17	29.26					

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

#### 1. Analysis

#### a. Educational Opportunities

i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

This school proficiency index is calculated based on performance of 4th grade students on state exams. It relies on attendance zones, if available, and otherwise calculates proficiency based on the performance of elementary schools within 1.5 miles of a block group's residents. Referring back to the index values broken down by race and ethnicity in Table 5, the degree of disparity among the county's racial and ethnic groups in access to proficient schools is relatively small. Asian residents are the most likely to live in neighborhoods zoned for good schools, followed by white and African American residents. With an index score of 61.11 to Asians' 69.18, Latinos were the least likely to have access to well-performing schools. This gap of 8.07 points indicates that Cherokee County's residents have somewhat similar levels of access to proficient schools.

When considering the larger Atlanta region, that disparity grows dramatically, from an 8.07-point gap, to a spread of nearly 30 points. While white residents of the region were slightly more likely that white residents of the county to have access to good schools, school proficiency index values for all other racial and ethnic groups were lower in the region than in the county, most markedly for African Americans. Index values for whites and Blacks are within a half-point of one another in Cherokee County, but are 29 points apart in the Atlanta region.

Based on this data, access to proficient schools is considerably more equal among racial and ethnic groups in Cherokee County than in the region as a whole. Some degree of disparity exists in the county, but on average, people of color who live in Cherokee County are more likely (in some cases, far more likely) to live in a neighborhood with access to good schools than their peers elsewhere in greater Atlanta.

For the Cherokee County population below the federal poverty line, access to proficient schools is diminished for most groups. In the county, poor white residents live in areas with an average school proficiency index 3.27 points lower than the county's white population in general, African Americans in areas with an average score 7.04 points lower, and poor Latinos, 8.45 points lower. Meanwhile, index scores for Asians and Native Americans increase for the portion of those populations in poverty. These values indicate that disparities between racial and ethnic groups widen for the population in poverty.

ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

The maps that follow show school proficiency scores with race and ethnicity, national origin, and familial status. They show that the county's highest proficiency scores are in a rural area on the east side of the county between the Etowah River and Cumming Highway, generally east of Jay Green Road to the county line. The average index score in this area is 92; the area

also happens to be 92% white. Other areas with index scores in the 80s are found south of Cumming Highway and east of Old Lathemtown/Arbor Hill Road, in the vicinity of the Capital City Club, in the southernmost reaches of Canton along Keeter Road, and near Lake Allatoona along Victoria Road. Most of these areas range from 87% to 94% white, except for the Canton/Keeter Road area, which is 71.2% white, making it more diverse than the county on average. The lowest scores (values in the 20s) are found in central Canton, northward to the Hickory Log Reservoir and the northeast corner of the county. Some of these areas are far more racially and ethnically diverse than the block groups with the highest index scores (e.g. downtown Canton, which is 56.46% people of color), yet others, particularly the rural areas bordering Bartow and Pickens counties, are greater than 93% white.

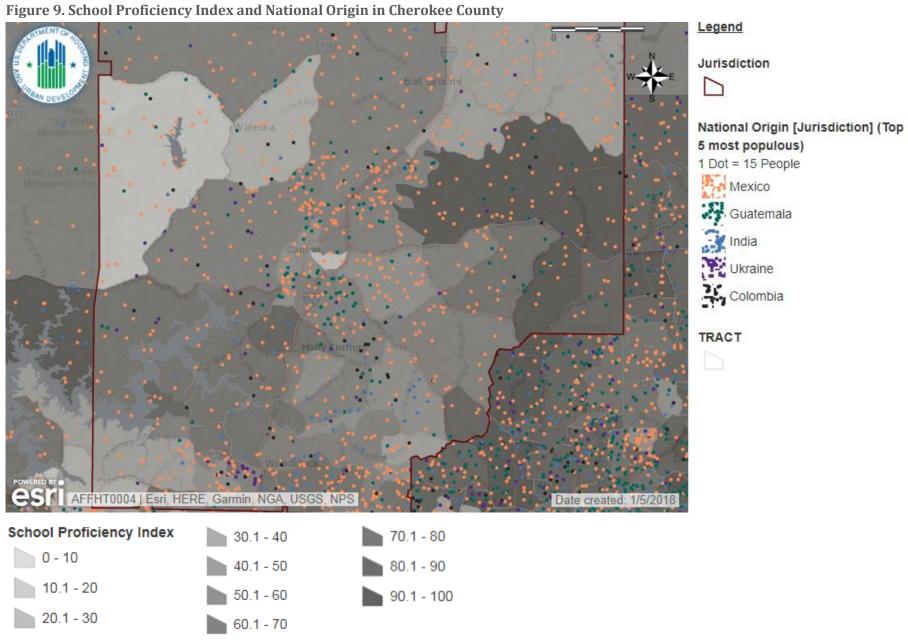
iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

Public education in Cherokee County is provided by the Cherokee County School District, which serves all the county's municipalities and unincorporated areas. The District serves more than 42,000 students and operates 41 elementary, middle, and high schools. While school proficiency index values are somewhat even across the county's population groups, stakeholder interviews and public meeting attendees described some schools as being better than others, a feature which can drive housing choice for some families. Specifically, Holly Springs and Hickory Flat were named as attractive communities in part because of the quality of their respective schools.

In the fair housing survey conducted as part of this analysis, respondents were generally positive about the availability of good schools and the degree to which school quality was equally available throughout the county. Presented with 15 potential barriers to fair housing choice and asked which applied to Cherokee County, "limited access to good schools" was the lowest-ranked option, with only two respondents believing this was a barrier to fair housing in the county.

Legend Jurisdiction Demographics 2010 1 Dot = 50 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS School Proficiency Index 70.1 - 80 30.1 - 40 0 - 10 40.1 - 5080.1 - 90 10.1 - 20 50.1 - 60 90.1 - 100 20.1 - 3060.1 - 70

Figure 8. School Proficiency Index and Race/Ethnicity in Cherokee County



Legend Jurisdiction Ball Ground % of Households that are Families with Children • 0% - 20% 20.1% - 40% 40.1% - 60% 60.1% - 80% 80.1% - 100% TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/5/2018 **School Proficiency Index** 70.1 - 80 30.1 - 40 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20 50.1 - 60 90.1 - 100 20.1 - 30 60.1 - 70

Figure 10. School Proficiency Index and Households with Children in Cherokee County

#### b. Employment Opportunities

 For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Table 5 and the maps that follow provide data regarding access to jobs and labor market participation by race and ethnicity, national origin, and familial status. The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percentage of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Looking at jobs proximity, scores are somewhat closely clustered together in the 40s and 50s. The values by race and ethnicity range from a high of 56.23 for Hispanic residents to a low of 47.32 for white residents, indicating that Hispanics were most likely to live in neighborhoods with jobs nearby. The overall degree of disparity among groups was similar for the Atlanta region, but the index values for individual groups relative to one another are scrambled. Asians have the highest jobs proximity index values in the region (54.69) compared to African Americans, who have the lowest (45.96).

Analysis of the labor market index values illustrates the fact that proximity to jobs does not equate to access, and that areas closest to job centers are not necessarily the same as those with higher employment and labor force participation rates. Returning to the county-level data, Hispanics, who were most likely to live in areas with jobs nearby were the least likely to live in neighborhoods with high rates of labor force participation. Hispanic residents' score of 56.47 is nearly 12 points lower than that of Asians who, while more likely than any other group to live in communities with good labor force participation, were also among the least likely to live near jobs. In the Atlanta region, scores are uniformly lower and the gap between the highest and lowest scores grows from 11.83 to 29.36 points. Comparing the county to the region, no group was more affected by lower labor market index scores than African Americans, whose index value falls nearly 30 points. Whereas African American residents of Cherokee County have somewhat equal access to opportunity in terms of the labor market, in the Atlanta region, a wide disparity exists.

# ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

While neither employment index gauges residents' ability to obtain jobs, job proximity is likely to have an impact on employment opportunities, especially for low and moderate wage workers whose ability to afford transportation may be constrained. For those who do not have a personal vehicle, living near a bus route that connects easily to job centers with employment opportunities that match their skill set is crucial. However, because bus service is limited to Canton, transit dependent residents have little option to live in other parts of the county.

For low and moderate wage workers with personal automobiles, transportation costs may also affect job opportunities. Parking, fuel costs, and maintenance costs due to wear and tear on older cars can limit the distance employees are able to commute to work, and thus affect their ability to apply for jobs further from their residence.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

The link between the place someone lives, the availability of transportation and access to jobs was firmly established through consultation with stakeholders and members of the public. When asked about barriers to living in high opportunity areas within the county, multiple stakeholders described accessibility of jobs as a limiting factor. Woodstock, because of its somewhat denser and more urban development pattern is somewhat more likely than other communities to have housing proximate enough to job centers that it is accessible without a car. Regional bus service to Atlanta is also available from Woodstock, potentially opening up a wide range of employment options. Otherwise, residents may be limited to Canton, and even then would need to both live and work in Canton, because there is not bus service between Canton and other cities in the county.

Cherokee County's Office of Economic Development (COED) has actively worked with partner organizations throughout the county to expand access to employment. In 2017, COED announced a new initiative called the Workforce Cherokee Strategy. In addition to COED, the initiative draws on the strengths of a large group of partners including the Cherokee County School District, Cherokee County Chamber of Commerce, Georgia Department of Labor, Atlanta Regional Commission, Chattahoochee Technical College, Reinhardt University, and Kennesaw State University. Beginning with K-12 students and assembling a workforce supply chain that is responsive to the local economic and industry needs, the initiative involves entrepreneurship support, a scholarship and internship program for aspiring young professionals, and a program that offers college credit for students' professional development. An annual Career Expo is another example of the successful programming provided by COED to assist residents in accessing jobs in the county.

Legend Jurisdiction Demographics 2010 1 Dot = 50 White, Non-Hispanic Black, Non-Hispanic • Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT HERE, Garmin, NGA, USGS, NPS Jobs Proximity Index 70.1 - 80 30.1 - 40 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20 50.1 - 60 90.1 - 100 20.1 - 30 60.1 - 70

Figure 11. Jobs Proximity Index and Race/Ethnicity in Cherokee County

Legend Jurisdiction Demographics 2010 1 Dot = 50 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/5/2018 30.1 - 40 70.1 - 80 **Labor Market Index** 0 - 1040.1 - 5080.1 - 90 10.1 - 20 50.1 - 6090.1 - 100 20.1 - 30 60.1 - 70

Figure 12. Labor Market Index and Race/Ethnicity in Cherokee County

Figure 13. Jobs Proximity Index and National Origin in Cherokee County

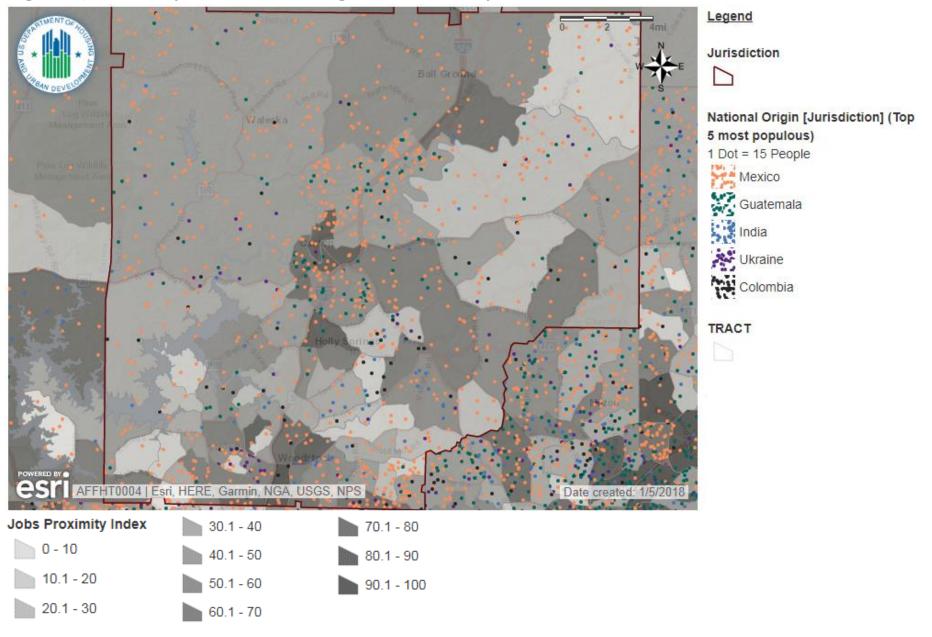


Figure 14. Labor Market Index and National Origin in Cherokee County Legend Jurisdiction National Origin [Jurisdiction] (Top 5 most populous) 1 Dot = 15 People Mexico Guatemala India Ukraine Colombia TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS 30.1 - 40 70.1 - 80 **Labor Market Index** 0 - 10 40.1 - 50 80.1 - 90

90.1 - 100

10.1 - 20

20.1 - 30

50.1 - 60

60.1 - 70

Figure 15. Jobs Proximity Index and Households with Children in Cherokee County

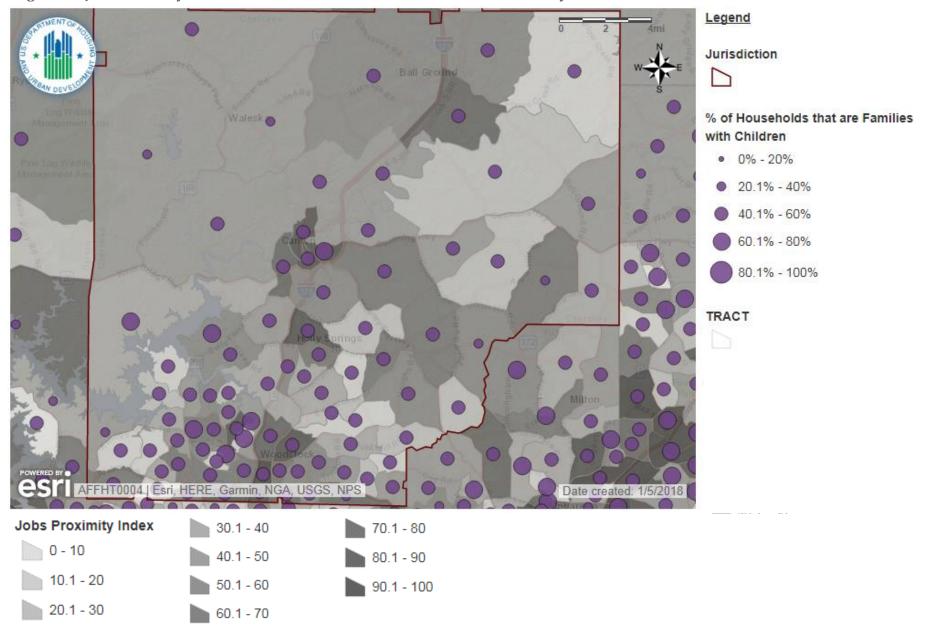
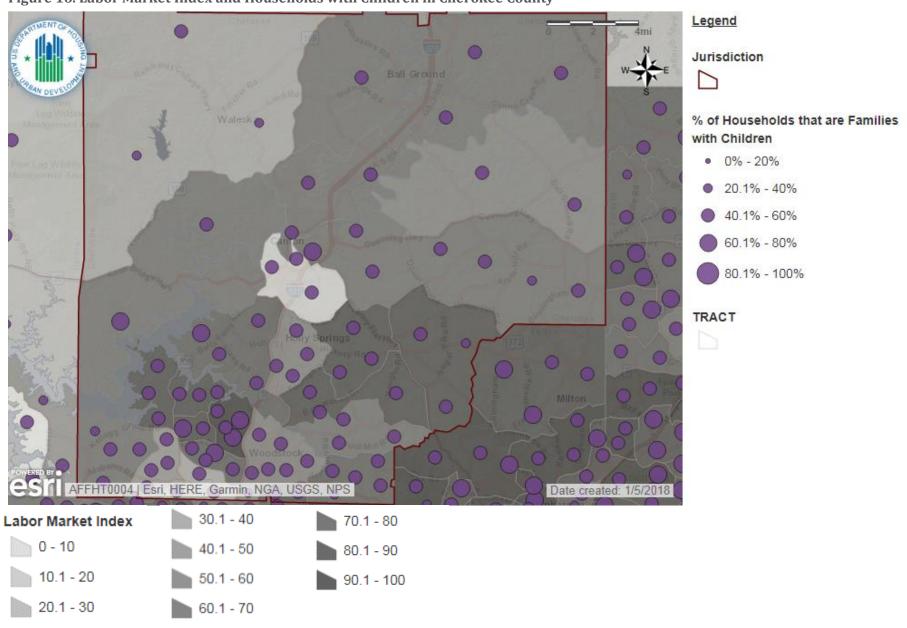


Figure 16. Labor Market Index and Households with Children in Cherokee County



#### c. Transportation Opportunities

 For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

The maps in this section illustrate data regarding access to transit and transportation costs by race and ethnicity, national origin, and familial status. The Transit Trip index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Cherokee County has very limited options for public transportation, yet transit index values are reasonably high and all within about 7 points of one another for the various racial and ethnic groups studied. Generally, people of color in Cherokee County live in neighborhoods where residents use transit at higher rates than whites. Asians, in both the county and the region, tend to live in neighborhoods with the highest levels of transit use and whites in areas with the lowest. For all population groups, regional index values are higher, which supports the general notion of transit use being greater in other parts of greater Atlanta than in Cherokee County.

The Low Transportation Cost index produces results somewhat similar to those of the Transit Trips index, only Hispanics, rather than Asians, have the highest scores. All scores for county residents are generally low, in the range of 20s and 30s. In the region, Low Transportation Cost Index values were uniformly higher and by an average of more than 10 points. This indicates the relatively higher transportation costs associated with suburban living, which typically comes with longer commutes, greater need for a household to own multiple vehicles, and reduced access to lower-cost transportation alternatives such as transit and bicycling.

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

Predictably, the transit trips index values are greatest in Woodstock and northward along the I-575 corridor. The more rural areas of the county, which also tend to be some of the least racially and ethnically diverse, had low scores on the transit trips index, but generally also had low scores on the transportation cost index. Because of being relatively more remote, transportation to and from these communities is more expensive.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

The Cherokee County Board of Commissioners operates the Cherokee Area Transportation System (CATS), which is the primary public transit provider for the county.

The system operates 2 fixed bus routes as well as a demand-response paratransit service. Weekday bus service runs from 8:00 a.m. to 4:00 p.m. with a 1-hour suspension between 12:00 p.m. and 1:00 p.m. for lunch. Buses are not operated on weekends or holidays. According to the National Transit Database, CATS provided 28,668 unlinked passenger trips in 2015 while the paratransit service provided another 48,262 trips.

CATS' fixed-route bus service does not extend beyond Canton, but Cherokee County is one of 12 adjacent Georgia counties participating in the Georgia Regional Transportation Authority (GRTA), a network of express coach bus service between Atlanta and its suburbs within the region. GRTA service in Cherokee County is available from Canton and Woodstock, both of which have park and ride lots available to accommodate parking for commuters using the service.

Figure 17. Transit Trips Index and Race/Ethnicity in Cherokee County

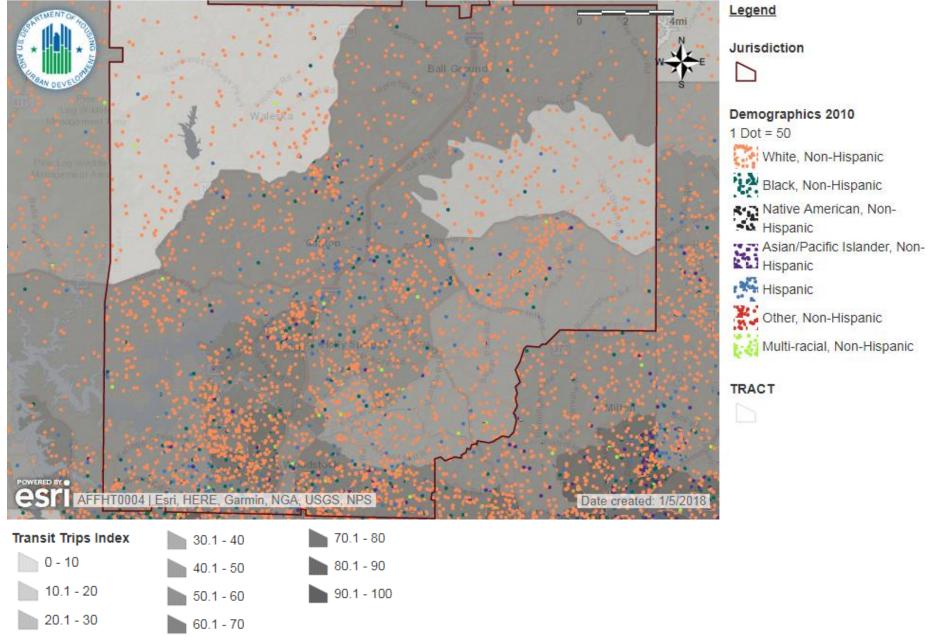


Figure 18. Low Transportation Cost Index and Race/Ethnicity in Cherokee County Legend Jurisdiction Demographics 2010 1 Dot = 50 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT **Low Transportation Cost Index** 30.1 - 40 70.1 - 80 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20

90.1 - 100

50.1 - 60

60.1 - 70

20.1 - 30

Figure 19. Transit Trips Index and National Origin in Cherokee County

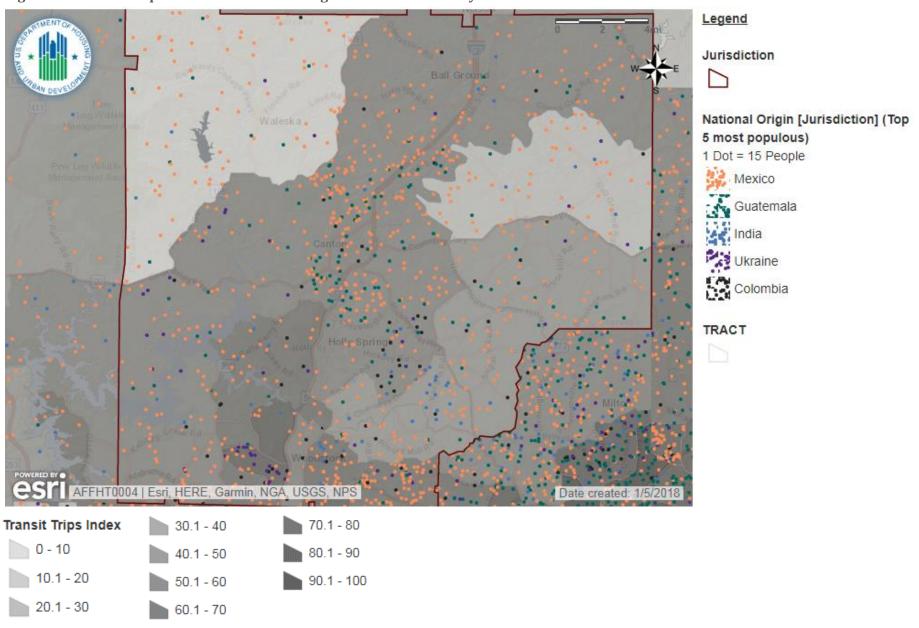


Figure 20. Low Transportation Cost Index and National Origin in Cherokee County Legend Jurisdiction National Origin [Jurisdiction] (Top 5 most populous) 1 Dot = 15 People Mexico Guatemala India Ukraine Colombia Colombia TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/7/20 Low Transportation Cost Index 30.1 - 40 70.1 - 80 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20 50.1 - 60 90.1 - 100

60.1 - 70

20.1 - 30

Legend Jurisdiction % of Households that are Families with Children • 0% - 20% 0 20.1% - 40% 40.1% - 60% 60.1% - 80% 80.1% - 100% TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/6/2018 70.1 - 80 Transit Trips Index 30.1 - 40 0 - 10 80.1 - 90 40.1 - 50 90.1 - 100 10.1 - 20 50.1 - 60 20.1 - 30 60.1 - 70

Figure 21. Transit Trips Index and Households with Children in Cherokee County

Legend Jurisdiction % of Households that are Families with Children • 0% - 20% 20.1% - 40% 40.1% - 60% 60.1% - 80% 80.1% - 100% TRACT Date created: 1/6/2018 Low Transportation Cost Index 30.1 - 40 70.1 - 80 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20 50.1 - 60 90.1 - 100 20.1 - 30 60.1 - 70

Figure 22. Low Transportation Cost Index and Households with Children in Cherokee County

#### d. Low Poverty Exposure Opportunities

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

The maps appearing in this section display data regarding poverty levels in Cherokee County and the region. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

In Cherokee County, Hispanic residents live in areas with a higher exposure to poverty than do Asians and whites. The total disparity between Asians (index value of 65.06) and Hispanics (index value of 52.98) is approximately 12 points, the largest disparity of all the county-level opportunity indices analyzed for this report. For the Atlanta region, whites have the least exposure to poverty, African Americans have the greatest, and the disparity grows to a gap of nearly 21 points. While for Cherokee County, the 12-point gap on this dimension of opportunity is one of the more significant, poverty exposure by race and ethnicity is more equitable than in the region.

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.

The area of least poverty exposure in Cherokee County is a tract containing the portion of Woodstock east of I-575 with a poverty index score of 97. This tract is more diverse than the county on average, with 78% of residents being white (compared to 81% for the county). However, this heightened diversity excludes Hispanics. While the African American share of the population in this area is far greater than that of the county, the Hispanic share is approximately half that of the county. The county's lowest poverty index score is found in a tract comprised of southern Canton, generally south of the Etowah River and west of the railroad tract. The demographics of this tract align fairly closely with those of the county.

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

Cherokee County's approach to reducing poverty and, thereby, the influence of poverty on housing choices, is based on strategies such as job skills training and reducing the cost of living for low-income families, particularly those with disabilities or limitations. To these ends, the County participates in a Housing Forum that holds periodic meetings to discuss needs in the community and to share information and, in 2015, the County became part of a Housing Collaborative to coordinate efforts to assist homeowners with needed home repairs. This partnership helps provide candidates to the Emergency/Minor Home Repair program. Additionally, Cherokee County works to assist the homeless and near-homeless through funding for MUST Ministries' Supportive Housing program. The services MUST provides help participants increase employment skills and/or income with a free computer

lab, resume assistance, business clothes from their clothes closet, coordination with Chattahoochee Tech to get GEDs, and other services.

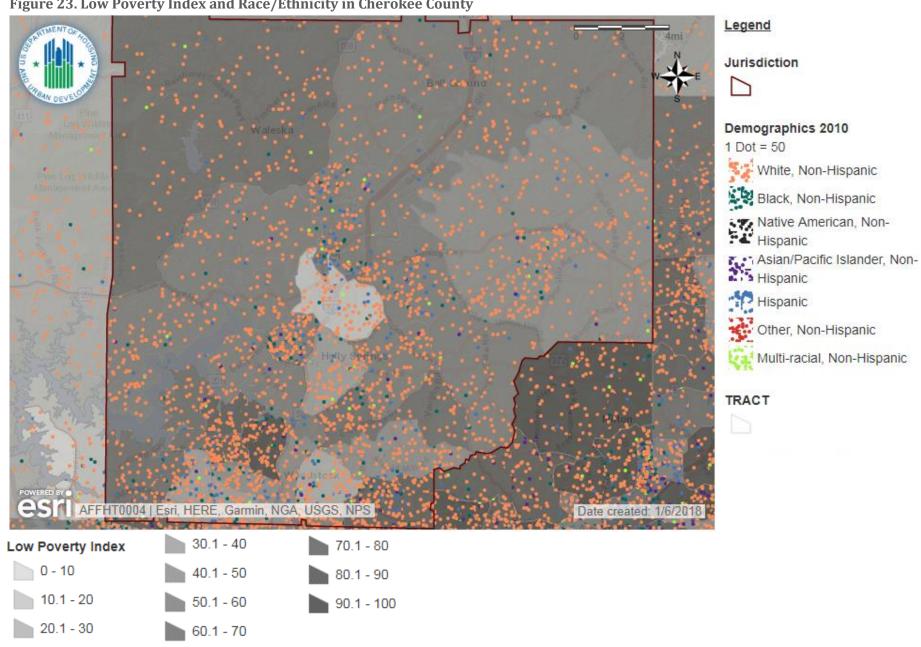
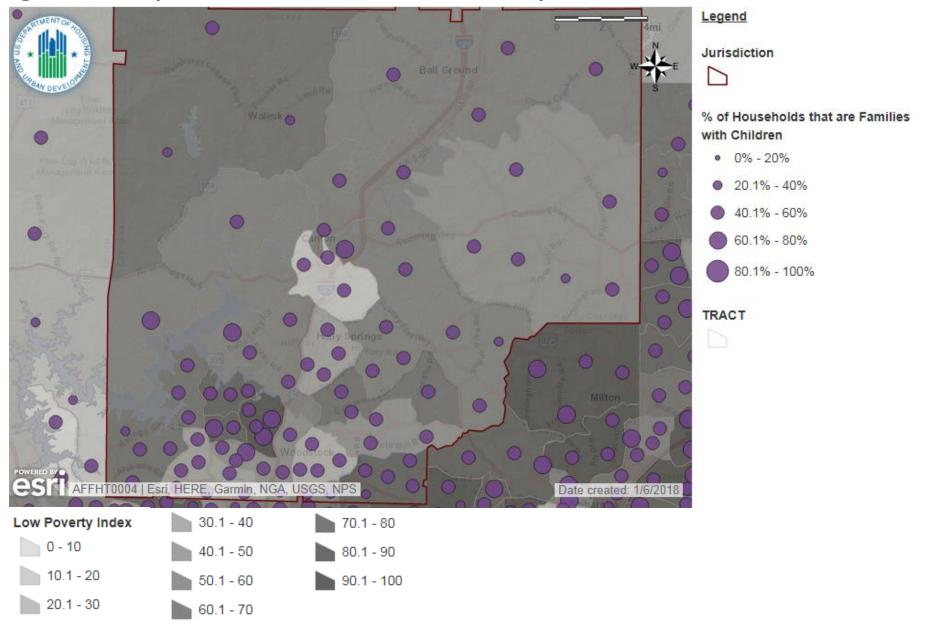


Figure 23. Low Poverty Index and Race/Ethnicity in Cherokee County

Figure 24. Low Poverty Index and National Origin in Cherokee County



Figure 25. Low Poverty Index and Households with Children in Cherokee County



#### e. Environmentally Healthy Neighborhood Opportunities

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The maps in this section illustrate levels of exposure to environmental health hazards. HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Cherokee County residents face relatively equal exposure to environmental health hazards by race and ethnicity. With a spread of just 4.31 points, scores on this index ranged from a low of 42.03 for Asians to a high of 46.34 for whites. Values were uniformly lower, and with a greater degree of disparity when considering the larger Atlanta region. Atlanta is known for having some air quality challenges and the lower index values outside Cherokee County (values in the 20s and 30s) support this perception.

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

Neighborhoods with the best air quality are located in parts of the county furthest from sources of traffic congestion, specifically, the I-575 corridor. These include the northern third of the county (containing Lake Arrowhead, Waleska, Nelson, and Ball Ground) where environmental health index scores range from 66 to 68. A tract in Woodstock, along the east side of I-575 from the Little River south to the county line had an index score of 30, the lowest in the county. Although disparities between racial and ethnic groups were minimal, the northern portion of the county with the highest scores on this index are all at least 90% white, while the Woodstock tract with the county's poorest air quality is about 73% white.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

More than 4 in 5 survey respondents believed their neighborhood gave them at least somewhat good access to a clean environment and environmental factors were not described as barriers or bases for disparity by stakeholders consulted or other members of the public who contributed to this analysis.

Legend Jurisdiction Demographics 2010 1 Dot = 50 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT **Environmental Health Index** 30.1 - 40 70.1 - 80 0 - 1080.1 - 90 40.1 - 50 10.1 - 2050.1 - 60 90.1 - 100 20.1 - 3060.1 - 70

Figure 26. Environmental Health Index and Race/Ethnicity in Cherokee County

Legend Jurisdiction National Origin [Jurisdiction] (Top 5 most populous) 1 Dot = 15 People Mexico Guatemala India Ukraine Colombia TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/6/2018 **Environmental Health Index** 30.1 - 40 70.1 - 80 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20 90.1 - 100 50.1 - 60 20.1 - 3060.1 - 70

Figure 27. Environmental Health Index and National Origin in Cherokee County

Figure 28. Environmental Health Index and Households with Children in Cherokee County Legend Jurisdiction % of Households that are Families with Children 0 • 0% - 20% 0 20.1% - 40% 40.1% - 60% 60.1% - 80% 80.1% - 100% TRACT Date created: 1/6/2018 **Environmental Health Index** 30.1 - 40 70.1 - 80 0 - 10 40.1 - 50 80.1 - 90 10.1 - 20 90.1 - 100 50.1 - 60 20.1 - 30

60.1 - 70

### f. Patterns in Disparities in Access to Opportunity

i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

Racial and ethnic disparities in access to opportunity in Cherokee County are small, particularly compared to disparities that exist in the Atlanta region. In the various opportunity indices analyzed, Hispanic residents of the county were most often the group with the lowest average index scores. Hispanics were more likely than any other group to live in communities with high rates of poverty, low-performing schools, and low levels of labor market participation. Even in cases where areas providing high levels of opportunity were observed to be demographically diverse, (as with the low poverty index) the diversity was attributable more to higher shares of African Americans or other, non-Hispanic people of color than to Hispanics.

ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

Areas of high levels of access to multiple opportunity dimensions include Woodstock, where high scores on indices of jobs proximity, low transportation cost, labor market participation, and low poverty were all found. Overlapping areas of good environmental quality and low poverty are found in northwest Cherokee County and Canton has good proximity to jobs paired with low transportation costs. Parts of Canton, however, were also low-scoring on multiple indices, including school proficiency, low poverty, and labor market participation.

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

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

#### **Priority Contributing Factors:**

- Availability of affordable units throughout the county
- Need for employment skills training

### **Non-Priority Contributing Factors:**

• Availability, type, frequency, and reliability of public transportation

### iv. Disproportionate Housing Needs

### 1. Analysis

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

To assess affordability and other types of housing needs, HUD defines four housing problems:

- 1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property tax, insurance, and utilities for owners, and rent and utilities for renters) exceed 30% of monthly income.
- 2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchens or bathrooms.
- 3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
- 4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

To assess housing need, HUD receives a special tabulation of data from the U.S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combinations of HUD-specified criteria, such as housing needs by race and ethnicity.

CHAS data for Cherokee County and the Atlanta-Sandy Springs-Roswell region is provided in Tables 6 and 7 below. In Cherokee County, there are 24,529 households with one or more housing problems, constituting about one-third (32.12%) of households countywide. Nearly one-in-seven households in the county face a severe housing need (11,790 households or 15.44%). Levels of need in the region are somewhat higher: over one-third of households in the region have a housing need (36.81%) and 19.00% have a severe need.

Looking at need by householder race and ethnicity in Cherokee County shows that 29.33% of non-Latino white households have a housing problem, and 13.13% have a severe housing problem. HUD defines a group as having a disproportionate need if its members face housing needs at a rate that is ten percentage points or more above that of white households. Using this definition, there are four groups in Cherokee County with disproportionate needs:

- Non-Latino African American households 43.15% have a housing need;
- Latino households 58.39% have a housing need and 39.33% have a severe housing need;
- Non-Latino Asian or Pacific Islander households 41.10% have a housing need and 27.15% have a severe housing need; and
- Non-Latino Native American households 46.39% have a housing need.

Within the Atlanta-Sandy Springs-Roswell region, housing and severe housing need rates for white households are slightly lower than those in Cherokee County at 27.87% and 12.95%, respectively. In the region, all five racial and ethnic groups examined have a disproportionate housing need:

- Non-Latino African American households 47.54% have a housing need and 25.47% have a severe housing need;
- Latino households 56.06% have a housing need and 35.14% have a severe housing need:
- Non-Latino Asian or Pacific Islander households 38.73% have a housing need;
- Non-Latino Native American households 41.94% have a housing need; and
- Other non-Latino households 42.03% have a housing need.

Table 6 also compares housing need rates for households by size and familial status. Small families (under 5 people) have the lowest rate of housing need at 27.32% in Cherokee County and 31.53% in the region. In Cherokee County, non-family households have the highest rate of housing need at 41.40%. Regionally, housing needs are most common among large family households (5 or more people), with 46.84% of households experiencing a housing need.

Table 7 examines only one dimension of housing need – severe cost burdens. Overall, 10,419 households in Cherokee County and 318,538 households in the Atlanta region spend more than 50% of their income on housing (11.52% and 14.01%, respectively). In Cherokee County, 12.01% of non-Latino white households face a severe cost burden, and two groups face severe housing needs at a disproportionate rate: Latinos (28.46%) and non-Latino Asian or Pacific Islanders (27.15%).

In the Atlanta-Sandy Springs-Roswell region, 11.80% of white households have a severe cost burden. Black and Latino households face disproportionate levels of severe cost burdens at 22.94% and 24.70%, respectively.

Table 7 also shows that family households (small and large) experience severe cost burdens at roughly the same rate in Cherokee County (about 11%) and in the region (about 15%). In each geography, non-family households have considerably higher incidence of severe cost burdens: 20.43% in the county and 21.75% in the region.

Overall, African American, Latino, Asian, and Native American households experience housing issues more frequently than whites in Cherokee County. Regionally, other non-Latino households also face higher rates of housing need. Non-family households are most likely to face housing needs in Cherokee County, and severe housing cost burdens in the county and region.

Table 6. Demographic	Table 6. Demographics of Households with Disproportionate Housing Needs								
Disproportionate Housing Needs	С	herokee Count	y	Atlanta-San	well Region				
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with # of problems household		% with ds problems			
Race/Ethnicity									
White, Non-Hispanic	19,176	65,387	29.33%	295,526	1,060,274	27.87%			
Black, Non-Hispanic	1,747	4,049	43.15%	290,077	610,123	47.54%			
Hispanic	2,922	5,004	58.39%	76,061	135,669	56.06%			
Asian or Pacific Islander, Non-Hispanic	439	1,068	41.10%	31,618	81,647	38.73%			
Native American, Non-Hispanic	90	194	46.39%	1,863	4,442	41.94%			
Other, Non-Hispanic	239	776	30.80%	10,668	25,383	42.03%			
Total	24,529	76,364	32.12%	705,860	1,917,580	36.81%			
Household Type and Size									
Family households, <5 People	13,521	49,490	27.32%	348,585	1,105,657	31.53%			
Family households, 5+ People	3,345	8,330	40.16%	93,825	200,309	46.84%			
Non-family households	7,678	18,545	41.40%	263,395	611,579	43.07%			
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems			
Race/Ethnicity	_								
White, Non-Hispanic	8,583	65,387	13.13%	137,309	1,060,274	12.95%			
Black, Non-Hispanic	833	4,049	20.57%	155,374	610,123	25.47%			
Hispanic	1,968	5,004	39.33%	47,671	135,669	35.14%			
Asian or Pacific Islander, Non-Hispanic	290	1,068	27.15%	17,382	81,647	21.29%			
Native American, Non-Hispanic	10	194	5.15%	724	4,442	16.30%			
Other, Non-Hispanic	139	776	17.91%	5,767	25,383	22.72%			
Total	11,790	76,364	15.44%	364,295	1,917,580	19.00%			

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS

Table 7. Demographics of Households with Severe Housing Cost Burden									
	C	herokee Count	.y	Atlanta-Sandy Springs-Roswell Region					
Households with Severe Housing Cost Burden	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe cost burden			
Race/Ethnicity									
White, Non-Hispanic	7,850	65,387	12.01%	125,145	1,060,274	11.80%			
Black, Non-Hispanic	720	4,049	17.78%	139,938	610,123	22.94%			
Hispanic	1,424	5,004	28.46%	33,513	135,669	24.70%			
Asian or Pacific Islander, Non-Hispanic	290	1,068	27.15%	14,136	81,647	17.31%			
Native American, Non-Hispanic	10	194	5.15%	644	4,442	14.50%			
Other, Non-Hispanic	125	776	16.11%	5,162	25,383	20.34%			
Total	10,419	76,364	13.64%	318,538	1,917,580	16.61%			
Household Type and Size									
Family households, <5 People	5,702	49,490	11.52%	154,875	1,105,657	14.01%			
Family households, 5+ People	912	8,330	10.95%	30,682	200,309	15.32%			
Non-family households	3,788	18,545	20.43%	133,040	611,579	21.75%			

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS

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

Figures 29 and 30 map the prevalence of housing problems in Cherokee County by census tract. There are three areas in the county where more than 40% of households have a housing need, including two tracts in Canton and one in Woodstock. The Canton tracts encompass the northern part of the city (tract 904.00, where 48.16% of households have a housing need, and the southwest portion, where 42.06% of households do. In Woodstock, the tract lying bounded by I-575, the Little River, Main Street, and the county line has a housing need rate of 43.85%.

Several of these census tracts are more racially diverse than Cherokee County as a whole. In Canton, the block groups comprising the census tracts with high housing need rates have Latino populations that range from 9% to 70%. In contrast, Latinos make up about 10% of county residents. African Americans also make up higher shares of the population in two Canton block groups (about 9%), compared to 5% throughout Cherokee County. Black and Latino residents also make up higher shares of Woodstock census tract with a high rate of housing need when compared to their population shares countywide.

In Canton, Mexican and Guatemalan immigrants are more likely to reside in the tracts with high rates of housing need, while Mexican and Colombian immigrants are more likely to live in the Woodstock tract.

Legend Jurisdiction Demographics 2010 1 Dot = 50 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 1/7/201 Percent Households with Burden 33.83 % - 41.82 % < 26.58 % 41.83 % - 52.17 % 26.59 % - 33.82 % 52.17 %

Figure 29. Housing Burden and Race/Ethnicity in Cherokee County

Legend Jurisdiction National Origin [Jurisdiction] (Top 5 most populous) 1 Dot = 15 People Mexico Guatemala India
Ukraine
Colombia TRACT AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Percent Households with Burden 33.83 % - 41.82 % < 26.58 % 41.83 % - 52.17 % 26.59 % - 33.82 %

Figure 30. Housing Burdens and National Origin in Cherokee County

> 52.17 %

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

Table 8 provides information for households living in publicly supported housing, including unit size (i.e., number of bedrooms) and presence of children, by housing program type. Assuming households with children would need two-bedroom or larger units, comparing the number of two- and three-plus bedroom units with the number of households with children does not immediately indicate overcrowding in assisted housing.

There are 71 households with children in public housing, and 98 units with two or more bedrooms. Additionally, 146 families with children use housing choice vouchers, and 195 households with vouchers live in units with two or more bedrooms.

Because data about households with children by household size is not available, more precise conclusions regarding the suitability of the existing housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernable without information about household size. Further, from Table 7, there are 912 large family households in Cherokee County with a severe cost burden, compared to 164 subsidized units with three or more bedrooms, indicating continued need for housing assistance for large families.

Table 8. Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children								
Housing Type	0-1 Be	holds in edroom nits	2 Bed	ouseholds in 2 Bedroom 3+ Unit Bedrooms		Unit	Households with Children	
g 1,p0	#	%	#	%	#	%	#	%
				Cherokee	County			
Public Housing	38	27.74%	42	30.66%	56	40.88%	71	51.82%
Project-Based Section 8	71	100.00%	0	0.00%	0	0.00%	N/a	N/a
Other Family	0	0.00%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	58	22.31%	87	33.46%	108	41.54%	146	56.15%

Data Source: APSH

### d. Describe the differences in rates of renter- and owner-occupied housing by race/ethnicity in the jurisdiction and region.

Table 9 provides the racial and ethnic distribution of homeowners and renters in Cherokee County and the Atlanta-Sandy Springs-Roswell region. In Cherokee County, the majority of owner households are white (89.00%), about 4% are African American, and another 4% Latino. For renters, about three-quarters are white (72.50%), ten percent are African American (9.77%), and 15.75% are Latino.

Regionally, there is more diversity amongst both owner and renter households, although whites remain more likely to own their homes. About two-thirds of owner households are white (65.35%), one-quarter are African American (24.50%), and 4.65% are Latino. Black householders make up the largest share of renters (45.76%), followed by whites (36.14%) and Latinos (11.69%).

The data in Table 9 can also be used to calculate homeownership rates by race and ethnicity, which shows that households of color are considerably less likely to be homeowners than white households. In Cherokee County, 82.28% of white households own their homes, compared to 61.23% of Black households and 49.54% of Latino households. Regionally, 77.50% of white households own their homes, while homeownership rates for all other racial and ethnic groups are lower, ranging from 43.11% for Latinos to 64.23% for Native Americans.

Table 9. Homeownership and Rental Rates by Race/Ethnicity									
		Cheroke	e County		Atlanta-Sa	ndy Sprin	gs-Roswel	l Region	
Race/Ethnicity	Ow	ners	Renters		Own	ers	Rent	ters	
	#	%	#	%	#	%	#	%	
Non-Hispanic									
White	53,755	89.00%	11,574	72.50%	821,800	65.35%	238,545	36.14%	
Black	2,464	4.08%	1,560	9.77%	308,060	24.50%	302,019	45.76%	
Asian	868	1.44%	190	1.19%	51,456	4.09%	30,187	4.57%	
Native American	169	0.28%	20	0.13%	2,844	0.23%	1,584	0.24%	
Other	665	1.10%	108	0.68%	14,939	1.19%	10,449	1.58%	
Hispanic	2,468	4.09%	2,514	15.75%	58,475	4.65%	77,169	11.69%	
Total	60,400	-	15,964	-	1,257,610	-	659,970	-	

Note: Data presented are number of households, not individuals.

Source: APSH

#### 2. Additional Information

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

Housing needs for people with disabilities will be discussed in the Disability and Access Analysis.

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

Although not an element of HUD's definition of housing need, the physical condition of housing units, particularly rental units, was noted by several stakeholders as an issue in Cherokee County. Stakeholders and public meeting participants commented that many renters are living in

substandard units with landlords who fail to make needed repairs and upkeep. There are limited resources to compel landlords to improve their properties, and even when such resources are available, tenants often chose not to report landlords due to fear of retaliation.

Stakeholders also described a lack of resources to help those in need of affordable housing, particularly elderly and disabled residents. While there are several market-rate properties offering care for disabled seniors, there are extremely limited options for low income seniors in need of housing with services. Stakeholders expect this need to grow as the county's population continues to age. Additional housing needs related to persons with disabilities are discussed in the Disability and Access Analysis.

### 3. Contributing Factors of Disproportionate Housing Needs

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

### **Priority Contributing Factors:**

- Availability of affordable units throughout the county
- Deteriorated and abandoned property
- Homeownership gap

### **Non-Priority Contributing Factors:**

• Lack of affordable, integrated housing for individuals who need supportive services

### C. Publicly Supported Housing Analysis

### 1. Analysis

### a. Publicly Supported Housing Demographics

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

Public housing in Cherokee County is operated by the Canton Housing Authority (CHA) and not by the county. Though CHA has been consulted in the course of this Analysis of Impediments, the Authority may prepare and submit its own fair housing study to HUD at a later date, which may include additional detail on publicly supported housing in the community.

CHA's public housing and Project-Based Section 8 units in the county are overwhelmingly occupied by white households, while Housing Choice Voucher holders are somewhat more evenly divided between white and Black households, with Black households making up the largest share. Given the county's overall demographics, white residents are overrepresented in Project-Based Section 8 units and are underrepresented public housing and HCV units. Hispanics comprise 9.57% of the county's population, but are 12.03% of the CHA's public housing residents, 5.97% of Project-Based Section 8 residents, and 8.98% of voucher holders.

ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

As discussed in the previous question, public housing and Project-Based Section 8 units in Cherokee County are primarily occupied by white households, while Housing Choice Voucher holders are somewhat more evenly divided between white and Black households. Hispanics make up significant shares of public housing and HCV residents, while too few Asians occupy CHA units to be considered in a meaningful comparison. The overall demographics of the Atlanta region are quite different from Cherokee County and, as a result, the racial and ethnic composition of publicly supported housing units in the region is different as well. Considering the region, African Americans make up the largest share of tenants in each type of publicly supported housing; whites occupy significant portions of Project-Based Section 8 units in the region (21.95%) and Hispanics are less than 2% of the tenants in each type.

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

As described previously, given the county's overall demographics, white residents are overrepresented in Project-Based Section 8 units and are underrepresented public housing and HCV units. Hispanics comprise 9.57% of the county's population, but are 12.03% of the CHA's public housing residents, 5.97% of Project-Based Section 8 residents, and 8.98% of voucher holders. Because the overall demographics of the Atlanta region differ significantly from Cherokee County's, the racial and ethnic composition of publicly supported housing units in the region differs as well.

Table 10. Publicly Supported Housing Units by Program Category						
Housing Units	#	%				
Housing Units	Cherokee County					
Total housing units	82,622	-				
Public housing	142	0.17%				
Project-based Section 8	70	0.08%				
Other multifamily	12	0.01%				
HCV program	279	0.34%				

Source: Decennial Census; APSH

Table	e 11. Publicly	y Supporte	d Housing	Residents	by Race/l	Ethnicity			
		Race/Ethnicity							
Housing Type	Whi	ite	Bla	Black		anic	Asian or Pacific Islander		
	#	%	#	%	#	%	#	%	
Cherokee County									
Public Housing	95	71.43%	21	15.79%	16	12.03%	1	0.75%	
Project-Based Section 8	61	91.04%	2	2.99%	4	5.97%	0	0.00%	
Other Family	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a	
HCV Program	102	41.63%	120	48.98%	22	8.98%	1	0.41%	
0-30% AMI	4,434	76.53%	419	7.23%	834	14.39%	35	0.60%	
0-50% AMI	7,455	57.55%	863	6.66%	1,822	14.07%	270	2.08%	
0-80% AMI	16,150	68.36%	1,340	5.67%	2,990	12.66%	464	1.96%	
Total Households	65,387	85.63%	4,049	5.30%	5,004	6.55%	1,068	1.40%	
Atlanta-Sandy Springs-I	Roswell Regi	on							
Public Housing	520	9.64%	4,634	85.91%	88	1.63%	149	2.76%	
Project-Based Section 8	2,175	21.95%	7,377	74.44%	179	1.81%	168	1.70%	
Other Family	344	25.00%	869	63.15%	18	1.31%	145	10.54%	
HCV Program	1,394	3.85%	34,075	94.21%	429	1.19%	246	0.68%	
0-30% AMI	84,438	35.92%	111,346	47.37%	25,839	10.99%	9,222	3.92%	
0-50% AMI	135,378	30.78%	192,122	43.68%	53,459	12.15%	17,910	4.07%	
0-80% AMI	274,738	36.96%	310,128	41.72%	83,585	11.24%	28,926	3.89%	
Total Households	1,060,274	55.29%	610,123	31.82%	135,669	7.08%	81,647	4.26%	

Note: Data presented are number of households, not individuals.

Source: Decennial Census; CHAS; APSH

	Table 12. Publicly Supported Housing Residents by Race/Ethnicity									
	Total # of Occupied Units	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with Children	% Elderly	% with a Disability		
			Cheroke	e County						
<b>Public Housing</b>										
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a		
Non R/ECAP tracts	136	71.43%	15.79%	12.03%	0.75%	51.82%	19.71%	14.60%		
Project-Based Secti	on 8									
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a		
Non R/ECAP tracts	70	91.04%	2.99%	5.97%	0.00%	N/a	98.59%	5.63%		
Other HUD Multifan	nily Housing									
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a		
Non R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	0.00%	N/a		
HCV Program	HCV Program									
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a		
Non R/ECAP tracts	41.63%	48.98%	8.98%	0.41%	56.15%	13.08%	19.23%	41.63%		

Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Source: APSH

Table 13. Demographics of Publicly Supported Housing Developments by Program Category								
	Cherokee County							
Development Name	# Units	% White	% Black	% Hispanic	% Asian	% House- holds with Children		
Public Housing								
Oakside Drive Apartments	142	70%	16%	12%	1%	52%		
<b>Project-Based Section 8 Housing</b>								
Colbert Square	70	87%	4%	7%	N/a	N/a		
Other HUD Multifamily Assisted Hous	ing							
Cherokee Residential Services	8	N/a	N/a	N/a	N/a	N/a		
Cherokee Crs Grimes Road, Inc.	4	N/a	N/a	N/a	N/a	N/a		

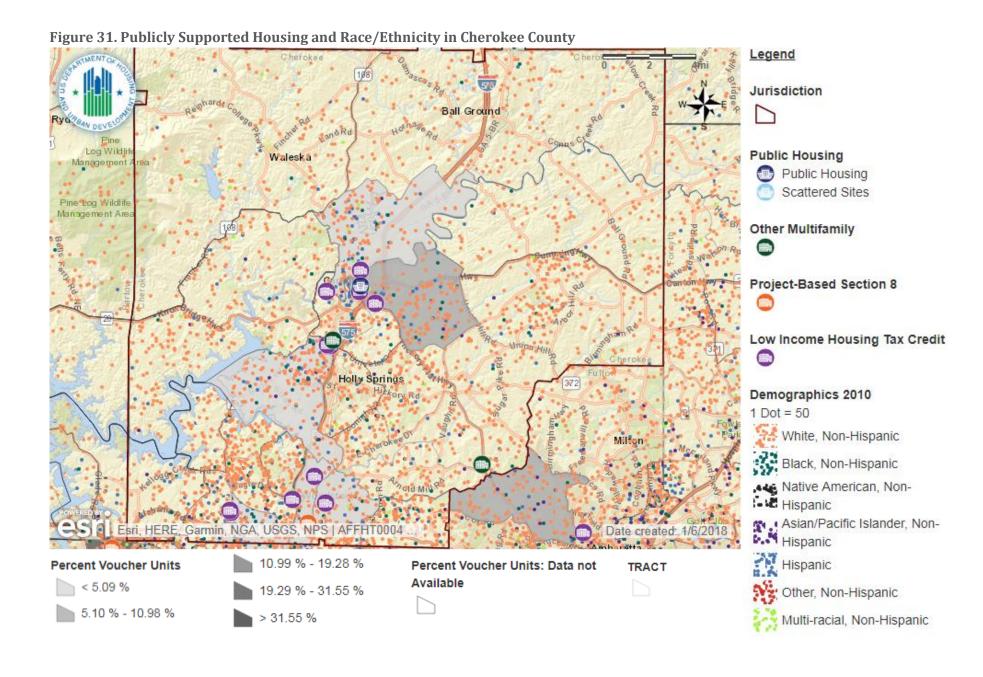
Note: For LIHTC properties, this information will be supplied by local knowledge. Percentages may not add to 100 due to rounding error.

Data Sources: APSH

### b. Publicly Supported Housing Location and Occupancy

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

The CHA owns and manages three public housing communities with a total of 142 units. All three are located in Canton, but fall into two different census tracts. Just north of downtown Canton, across the Etowah River, is the CHA's Oak Side Drive property; Shipp Street and Jefferson Circle, just east of downtown, are the other two locations. The tract containing these second two public housing properties is 72% white and is comprised of 8.72% HCV-subsidized units. The Oak Side Drive tract is 66% white, with a substantial Hispanic population. Voucher-subsidized units make up 3.25% of the housing stock in this tract.



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

Each of the CHA's types of publicly supported housing predominantly serves a different population. Nearly all residents (98.59%) of Project-Based Section 8 units are elderly, none are families with children, and 5.63% are disabled. Families with children are the largest share of public housing occupants, making up over half (51.82%) of all tenant households. And HCV-holders are more likely to be disabled (41.63%) than elderly (19.23%) or families with children (13.08%).

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

Cherokee County does not have any tracts designated as R/ECAPs.

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

No more than one property of any given type of supported housing is listed in the HUD data, therefore, comparisons between properties within such categories are not possible.

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

No additional relevant information is locally available.

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

According to Table 13, CHA's public housing units are predominantly occupied by white residents (70%). This is approximately as diverse as the surrounding neighborhoods, as the tracts where the units are located are 72% and 66% white. Both the public housing tenants and the surrounding communities are more diverse than the overall population of the county, which is 81% white.

### c. Disparities in Access to Opportunity

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

All three public housing developments in Cherokee County, as well as the tract with the highest rate of HCV use, are located near downtown Canton. This area scored highly on some measures of opportunity and low on others. The neighborhoods surrounding downtown Canton generally have some of the best transit access, lowest transportation costs, and best proximity to jobs. However, these communities also are zoned for some of the county's lower-performing schools, have high rates of poverty, and low levels of labor market engagement.

#### 2. Additional Information

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

Respondents to the Fair Housing Survey, when identifying barriers to fair housing in Cherokee County most often named "Not enough affordable rental housing for large families". In second place was the response "Community opposition to affordable housing". When asked about the need for more housing of various types, respondents were least inclined to believe Cherokee has a need for more apartments, and only slightly more likely to identify a need for "more housing that accepts Section 8 vouchers".

Though the survey did not directly ask respondents for their general opinions about rental housing or publicly subsidized housing, some survey-takers entered additional comments in optional comment fields often indicating strong negative feelings toward these housing types. These "not in my backyard" (NIMBY) attitudes are likely to pose a challenge to public or private entities that attempt to expand decent affordable rental housing stock in the county. A selection of survey responses appears below as examples of this attitude:

- More section 8 housing will only increase crime and run-down unsightly areas like all those trailer parks on Old Hwy 5. This drops property values.
- Fewer high density housing developments, like apartments and townhomes.
- What does affordable housing mean? Does it mean someone who got knocked up at 15 and now has 3 kids and is on welfare should be able to get a free 3-bedroom apartment on my hard-working dime?
- Further housing development should be completely turned down.
- Cherokee County is still fairly nice, in most places, and the last thing we need are more criminals, illegals and Section 8 scum.
- No more apartments and no Section 8, period.

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

CHA Applied for a ROSS grant in October of 2017. If funded, the grant would provide support for additional programming aimed at helping with education and other needs of public housing tenants.

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

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

### **Priority Contributing Factor**

• Source of income discrimination

### Non-Priority Contributing Factor

• Community opposition

### D. Disability and Access Analysis

### 1. Population Profile

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

In Cherokee County, an estimated 20,110 persons 5-years-old or older have a disability (Table 15), representing 9.91% of the total population. People aged 18 to 64 have the highest disability rate at 5.36% and the rate for seniors (persons age 65 and older) is 3.76%. In contrast, fewer than 1% of children between the ages of 5 and 17 are disabled. Within the Atlanta region, the disability rate for the population aged 5 and up is 10.24%. This rate is comparable to that of the county, indicating that people with disabilities are approximately as likely to live in Cherokee County as in the region overall.

Ambulatory disabilities are the most common type in the county, affecting 5.39% of the population, followed by cognitive and independent living difficulties, which impact 3.79% and 3.66%, respectively. The maps that follow show the geographic distribution of persons with disabilities throughout the region. Areas where people with disabilities are most clustered include Canton, Woodstock, Sixes, and the far southwest corner of the county, in the neighborhoods surrounding Clark Creek Elementary School.

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

The maps that follow show the geographic distribution of persons with disabilities by age and type. Geographic patterns for individual age groups illustrate a marked difference in the area where disabled seniors tend to live as opposed to the disabled population under age 65. Disabled children are most concentrated in the neighborhoods along Towne Lake Parkway and in eastern Holly Springs and Hickory Flat. Disabled adults under 65 are primarily found in Sixes and in the neighborhoods surrounding Clark Creek Elementary School in the southwest corner of the county. Meanwhile, the population of disabled seniors aged 65 and over tend to live in Canton, Sixes, the Clark Creek Elementary School area and are perhaps most tightly clustered in a tract along the county's border with Cobb County in the vicinity of Hames Road and Willow Creek Drive. In a disability-specific analysis, the densest clusters of people with ambulatory, cognitive, and independent living disabilities are found in the Canton, Woodstock, and Sixes areas. People with self-care disabilities are clustered in Canton and Woodstock as well, but not in Sixes. Instances of hearing and vision disabilities were distributed relatively evenly across the county.

Table 14. Disability by Type								
Disability Type	Cherokee	County	Atlanta-Sandy Springs-Roswell Region					
	#	%	#	%				
Hearing difficulty	6,515	3.21%	124,237	2.51%				
Vision difficulty	3,992	1.97%	96,741	1.95%				
Cognitive difficulty	7,696	3.79%	195,085	3.94%				
Ambulatory difficulty	10,932	5.39%	273,305	5.52%				
Self-care difficulty	3,876	1.91%	101,952	2.06%				
Independent living difficulty	7,431	3.66%	185,645	3.75%				

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

Source: ACS

Table 15. Disability by Age Group							
Age of People with Disabilities	Cherokee	County	Atlanta-Sandy Springs-Roswell Region				
	#	%	#	%			
Age 5-17 with disabilities	1,602	0.79%	43,816	0.88%			
Age 18-64 with disabilities	10,882	5.36%	285,608	5.77%			
Age 65+ with disabilities	7,626	3.76%	177,645	3.59%			

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

Source: ACS

Legend Jurisdiction Ball Ground Pine Log Wildlife Management A Disability 1 Dot = 25 Hearing Disability Pine Log Wildlife Management Are Vision Disability Cognitive Disability TRACT Esri, HERE, Garmin, NGA, USGS, NPS • Date created: 1/6/2018 5

Figure 32. Persons with a Hearing, Vision, or Cognitive Disability in Cherokee County

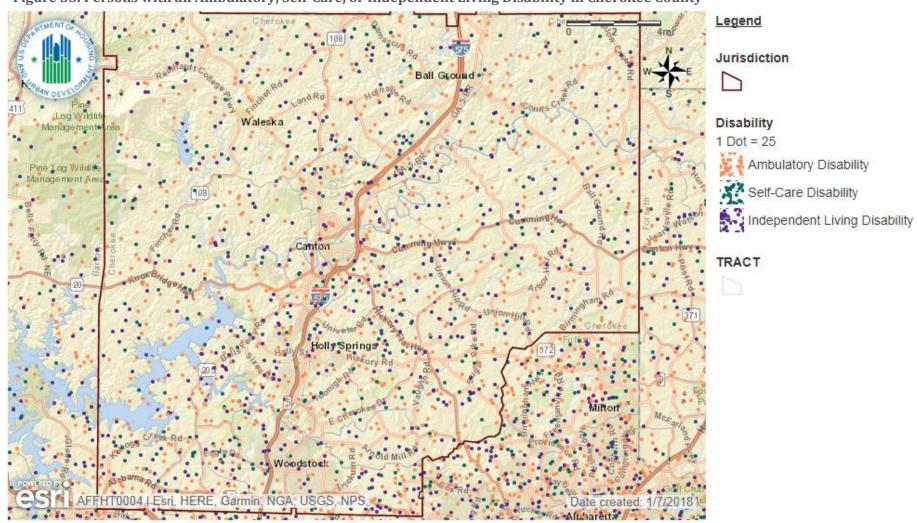


Figure 33. Persons with an Ambulatory, Self-Care, or Independent Living Disability in Cherokee County

Legend Jurisdiction Disability 1 Dot = 25 Disabled Ages 5-17 Pine Log Wildlife Management Area Disabled Ages 18-64 Disabled Over 64 TRACT

Figure 34. Persons with a Disability by Age in Cherokee County

### 2. Housing Accessibility

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

Stakeholder input indicates that affordable, accessible housing in a range of unit sizes is a significant need in Cherokee County. Analysis of responses to the public survey conducted for this report found the need for housing for people with disabilities tied with housing that people with low incomes can afford as the second-most important types of housing needed, behind first-time homebuyer assistance. However, when later asked to identify barriers to fair housing in Cherokee County, just 35% of survey respondents named the lack of housing options for people with disabilities as a barrier.

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

A search using HUD's Affordable Apartment Search Tool was conducted to identify affordable rental properties in Cherokee County designed to serve people with disabilities. The search returned three results; one property specifically designated for people with disabilities (Cherokee Residential Services on Univeter Road), one listed as being for elderly households, and the third without any indication of a target tenant population. A similar point-in-time search on socialserve.com for affordable apartments with accessibility features currently for rent in the Cherokee County area returned five results. Of these five available units, four were units all at the same property (Alta Ridgewalk Apartments in Woodstock) with advertised rents ranging from \$727 to \$1360 per month. The fifth unit was located at Columbia Creek Apartments, also in Woodstock, with a monthly rent of \$758.

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

Despite comparable overall rates of disability in Cherokee County and the Atlanta region, the distribution of people with disabilities in the different types of publicly supported housing varies in some significant ways. As Table 16 shows, persons with disabilities are able to access various types of publicly supported housing, but make up a larger share of Housing Choice Voucher program participants than any other housing type. Whereas over 30% of public housing units in the Atlanta region are occupied by a household containing at least one member with a disability, in Cherokee County, this population comprises only 14.6% of the public housing residents.

Table 16. Disability by Publicly Supported Housing Program Category							
		People with	a Disability				
Housing Type	Cherokee	County	Atlanta-Sandy Springs- Roswell Region				
	#	%	#	%			
Public Housing	20	14.60%	1,721	31.27%			
Project-Based Section 8	4	5.63%	941	9.12%			
Other Multifamily Housing	N/a	N/a	83	5.43%			
HCV Program	50	19.23%	6,469	17.63%			

Note: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

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

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

The County's zoning ordinance imposes substantial restrictions on the siting and occupancy of personal care homes, effectively limiting integration of group homes and people with disabilities into existing communities.

A small personal care home (or community living arrangement), as defined by the code, may house up to six "ambulatory" residents. A small personal care home is permitted in the agricultural and all residential districts. While allowing six residents per dwelling is more permissive than the ordinance's definition of family (which is limited to four unrelated residents), the caveat that the residents be ambulatory could potentially exclude persons who rely on a wheelchair or other mobility equipment. County staff have indicated that their operational definition of the term "ambulatory" includes people able to move about, whether by walking, wheelchair, or other means; however, ambiguity around the term's meaning could lead to its misapplication. It would be discriminatory for an ordinance to favor people with certain disabilities (or no disabilities) but treat differently people with other types of disabilities by imposing additional restrictions.

Additionally, siting of personal care homes is limited by minimum spacing requirements imposed by the zoning code. In all residential districts where a small personal care home (of up to six residents) may be sited, no personal care home may be operated within 1,000 feet of any other residential care facility. The County's spacing requirements limit the overall aggregate capacity of housing for people with disabilities, even if the need in the community or region is greater than the thresholds permit. Spacing requirements for protected classes are generally inconsistent with the Fair Housing Act, and the County's code makes no legislative or governmental justification for the spacing required by its ordinance.

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

The primary source of funding for supportive housing in Cherokee County comes from various HUD grants, which the county and/or partner agencies may receive only indirectly through the Georgia Department of Community Affairs. As a member of what is known as the "Balance of State" continuum of care, Cherokee County-based organizations must compete for the funding against other communities across the whole state, making this a very limited resource. MUST Ministries receives funding through these programs for a supportive housing program that supports approximately 70 people who are chronically homeless and who live with disabilities. Most of these supportive housing opportunities are in neighboring Cobb County, but MUST does maintain a small number of supportive housing beds in Cherokee County as well.

### 4. Disparities in Access to Opportunity

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

#### i. Government services and facilities

Most government facilities are accessible, but when private facilities are used for public purposes, (e.g. polling places), accessibility can be an issue. Stakeholders recalled instances of having to use a back door, which is sometimes found to be locked, to access a polling location.

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

Too many places don't have automatic doors. One participant described often needing to take a friend with her on errands just to have help opening and holding doors. New rooftop bars, especially in Canton and Woodstock, are not accessible and, under a certain number of stories, are not required to have elevators.

#### iii. Transportation

The CATS system is not adequate because it doesn't work with typical work schedules. Downtown Woodstock has a trolley, but it's not clear whether the trolleys are accessible.

### iv. Proficient schools and educational programs

Depending on the type of disability someone has, they may have different considerations in choosing a school. For example, Sequoyah High School is two levels and may not be a school of choice for someone who uses a wheelchair.

### v. Jobs

The largest barrier to jobs for people with disabilities is transportation, especially if it is shift work and outside the service hours of CATS. Many people with disabilities are limited to home-based employment due to the difficulties associated with transportation and this limits the types of employment available. Additionally, too much employment income could result in ineligibility for Medicaid and other important public benefits, resulting in a disincentive for seeking fulltime employment.

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

In April 2018, after the drafting of this AI, the County's Board of Commissioners adopted an amendment to the Zoning Ordinance establishing a reasonable accommodation provision. Because the provision was added after this report was written, it was not reviewed as part of this research. Prior to adoption of the reasonable accommodation provision, the County's code provided only for a hardship variance. The purpose of a variance is different from that of a request for reasonable accommodation, as a variance requires a showing of special circumstances or conditions peculiar to the land and involves a public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing and applies a standard based on the disabilities of the residents rather than the physical characteristics of the property.

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

The American Community Survey does not provide tenure or homeownership rates for persons with a disability or by disability type, nor is this data available locally. However, stakeholder input suggests multiple difficulties that may be faced by people with disabilities in achieving homeownership. Many people with disabilities receive Supplemental Security income because they are not able to work. This income alone is typically not sufficient to qualify for a home loan. Finding a accessible home to buy in the first place can be a challenge as well, and the amount required to modify a non-accessible home is considerable. Finally, one meeting participant described knowledge of homeowners associations that require dues of all residents, but whose facilities are not accessible to people with disabilities. All of these combine to make accessible for-sale housing difficult to find and nearly impossible for many people with disabilities to purchase.

### 5. Disproportionate Housing Needs

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

HUD's Comprehensive Housing Affordability Strategy (CHAS) data provided for this analysis does not identify levels of housing need for persons with disabilities or by disability type. However, based on a standard Supplemental Security Income (SSI) payment of \$735 per month (equating to an affordable rent of \$220 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens.

#### 6. Additional Information

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

No additional relevant sources of local data are available.

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

Cherokee County is not aware of any further available information regarding this assessment of disability and access issues.

### 7. Disability and Access Issues Contributing Factors

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

### **Priority Contributing Factors**

- Lack of affordable, accessible housing in range of unit sizes
- Land use and zoning laws

### **Non-Priority Contributing Factors**

- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure
- Lack of affordable, integrated housing for individuals who need supportive services

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

### 1. List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administration complaints or lawsuits against the locality alleging fair housing violations or discrimination.

For the five-year period reviewed—January 1, 2012 through November 8, 2017—no unresolved charges, letters of finding, voluntary compliance agreements, complaints, or lawsuits related to fair housing were found pertaining to or involving parties within Cherokee County.

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

Georgia has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 *et seq.* (the "Fair Housing Act"), known as the Georgia Fair Housing Act (O.C.G.A. §8-3-200 *et seq.*). Both the federal and state laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by the FHA. Moreover, O.C.G.A. §8-3-220 prohibits local governments (or "political subdivision[s] of the state") from adopting fair housing ordinances that extend protected class status to individuals who are not currently protected under the Georgia Fair Housing Act.

Although the Georgia act permits political subdivisions of the state to adopt local fair housing ordinances consistent with the state's act, Cherokee County has not adopted a local nondiscrimination or fair housing ordinance or established a local commission empowered to receive and resolve fair housing complaints.

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

Cherokee County has three primary sources of fair housing information, outreach, and enforcement: Metro Fair Housing Services, the Georgia Commission on Equal Opportunity, and the U.S. Department of Housing and Urban Development.

Metro Fair Housing Services, Inc., headquartered in Atlanta, uses the FHIP funding it receives to conduct education and outreach, complaint intake and processing, and fair housing testing (systemic and complaint-based) in areas that include the Greater Atlanta Metropolitan Area including Cherokee County. Through the most recent multiyear FHIP funding grant, Metro Fair Housing may receive and investigate complaints of alleged housing discrimination, conduct mediation and conciliation efforts; and refer meritorious claims to HUD.

The Georgia Commission on Equal Opportunity (GCEO) is under the auspices of the Office of the Governor. The GCEO has a Board of Directors made up of attorneys and community leaders statewide. The CGEO has two divisions: the Equal Employment Division and the Fair Housing Division. The mission of the Fair Housing Division is to promote broader housing choices in Georgia; to promote understanding of the Georgia Fair Housing Act and the federal FHA; to encourage integrated communities/neighborhoods; to secure compliance with state and federal fair housing laws; to eliminate discrimination; and to punish persons who violate fair housing laws.

HUD's Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) in Atlanta 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 eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

#### 4. Additional Information

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

An individual who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

After receiving a complaint of housing discrimination, HUD's Office of FHEO will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, HUD must prepare a report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO finds "reasonable cause," HUD then issues a Charge of Discrimination and a hearing/trial will be scheduled before an administrative law judge. If the FHEO determines that there is no reasonable cause, the case is dismissed.

Under Georgia's Fair Housing Act, the Georgia Commission on Equal Opportunity (GCEO) has the authority and responsibility to administer and enforce fair housing rights. Georgia's housing

discrimination law has been judged to be "substantially equivalent" to the federal FHA, which allows for HUD-subsidized, state-level enforcement of fair housing laws through the Fair Housing Assistance Program (FHAP). The GCEO ceased to participate in the FHAP in 2012, though it has reported that as of 2015 it was working to re-certify as a FHAP agency.

The investigation, conciliation, reasonable/no reasonable cause findings, and charge procedures under the Georgia Fair Housing Act are substantially similar to the HUD process, including an administrative hearing with the availability of compensatory and injunctive relief. However, where the matter involves the legality of any state or local zoning or other land use law or ordinance, the GCEO administrator must refer the matter to the Attorney General for appropriate action instead of issuing a charge.

An aggrieved party may also opt to bypass the federal and state administrative routes and instead file a civil action directly in federal district court or state superior court, thus maintaining control of the case and the potential to collect punitive damages. Civil litigation is available without first exhausting administrative remedies unless the parties have already entered a conciliation agreement, or, following a charge of discrimination, an administrative hearing has already commenced.

The advantages of seeking redress through the administrative complaint process are that proceedings are generally more expedited than the federal court trial process and HUD or the GCEO takes on the duty, time, and cost of investigating the matter for the complainant. Additionally, conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

#### **Complaints Filed with HUD**

The Atlanta Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. The office responded to a request for data regarding complaints received affecting housing units in Cherokee County for the last five year period.

From January 1, 2012 through November 12, 2017, HUD received 11 formal complaints of alleged housing discrimination occurring within Cherokee County. Nine of the reported cases involving perceived or alleged discrimination have been closed; two of the 11 cases are still open and under investigation.

	Table 17. HUD Housing Discrimination Complaints, 2012 to 2017									
Case No.	Filing Date	Closing Date	Basis	Issue	Closure Reason	Amount				

04-13- 0055-8	10/19/2012	6/3/2013	Sex, Disability, Familial Status	Discrimination in the terms/conditions for making loans; Otherwise deny or make housing unavailable	Conciliation/ settlement successful	\$7,000.00
04-13- 0050-8	10/18/2012	1/7/2014	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Noncompliance with design and construction requirements (handicap); Failure to provide accessible and usable public and common user areas; Other noncompliance with design and construction requirements	Complainant failed to cooperate	
04-13- 1074-8	9/11/2013	7/17/2014	Race, Color, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	
04-14- 0367-8	2/27/2014	3/28/2014	Disability	Discriminatory refusal to negotiate for rental; Discriminatory advertisement - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/ settlement successful	
04-15- 0590-8	5/7/2015	3/1/2016	Race, Color, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Steering; Otherwise deny or make housing unavailable	No cause determination	
04-15- 0707-8	6/3/2015	8/19/2015	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	
04-16- 4341-8	2/24/2016	5/26/2016	National Origin	Discrimination in the selling of residential real property; Discrimination in terms/conditions/privileges relating to sale	No cause determination	
Case No.	Filing Date	Closing Date	Basis	Issue	Closure Reason	Amount
04-16- 5473-8	9/28/2016	2/28/2017	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/ settlement successful	

04-16- 4993-8	8/12/2016	9/14/2016	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/ settlement successful	\$1,000.00
04-17- 7794-8	4/14/2017		Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Open investigation	
04-17- 9679-8	9/21/2017		Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Open investigation	

More than one basis of discrimination may be cited in a single complaint. Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory issue. Of the 11 complaints received and investigated by HUD, race and disability were the leading cause of complaint, each cited in 5 out of 11 cases; familial status and color were each cited as the basis in two cases; sex in one case, national origin in one case, and retaliation in one case.

Four of the cases were settled after successful conciliation/mediation facilitated by HUD. In two of the cases, complainant(s) received a monetary award following successful conciliation and settlement-- \$7,000 in one case and \$1,000 in another case. In the cases in which HUD negotiated or mediated conciliation/settlement, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

### Complaints Filed with the Georgia Equal Opportunity Commission

The GCEO, which maintains complaint data by counties, reported that it had not received any formal complaints of housing discrimination in Cherokee County for the period January 1, 2012, through November 16, 2017. The last complaints received dated back to two complaints in 2009 and three complaints in 2010.

	Table 18	. GCEO Housii	ng Discrimination Complaints	, 2012 to 2017	
GCEO Case #	HUD Case #	Basis	Issue	Closure Reason	Amount
20090021	040906628	Race, Sex	Different Terms, Conditions, Privileges, or Services/ Facilities Coercion, Intimidation, Harassment, & Interference	Complainant failed to provide required / requested information	
20090174	041001328	Disability	Different Terms, Conditions, Privileges, or Services/ Facilities	No cause determination	
20100074	041009388	Disability	Failure to make a reasonable accommodation	Complainant failed to provide required / requested information	
20100111	041012798	Race	Different Terms, Conditions, Privileges, or Services/ Facilities Coercion, Intimidation, Harassment, & Interference	Case Transferred HUD	
20100166	041016378	Race	Different Terms, Conditions, Privileges, or Services/Facilities	Info not provided in system	

More than one basis of discrimination may be cited in a single complaint. Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory issue. Of the 5 complaints received by the GCEO in 2009 and 2010, race was the leading cause of complaint, cited in 3 out of 5 cases, followed by disability in two cases, and sex in one case.

### Complaints Filed with the Metro Fair Housing Services, Inc.

Multiple requests were made via phone and email to Metro Fair Housing Services for data reflecting the number of complaints of housing discrimination it had received regarding housing units in Cherokee County for the period January 1, 2012 through November 16, 2017, the status of all such complaints, and the basis/bases of all such complaints. However, as of the writing of this draft, no response had been received from Metro Fair Housing concerning this request.

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

No additional local information is available.

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

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair

housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

### **Priority Contributing Factors**

• Lack of resources for fair housing agencies and organizations

### Non-Priority Contributing Factors

- Lack of state or local fair housing laws
- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement

### VI. Fair Housing Goals and Priorities

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Listed in the table below are the fair housing issues with their associated contributing factors. The contributing factors are organized into two groups: priority contributing factors are those that are most likely to limit or deny fair housing choice or access to opportunity and which the program participants have the ability to address. Non-priority contributing factors are likely to have a causal relationship to the fair housing issue, but are less directly or immediately able to remedy the named issue.

	Table 19. Contributing Factors by	Priority Level
Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors
Segregation/ Integration	<ul> <li>Availability of affordable units throughout the county</li> <li>Continued need for community revitalization</li> <li>Private discrimination</li> </ul>	<ul> <li>Community opposition</li> <li>Lack of regional cooperation</li> <li>Availability, type, frequency, and reliability of public transportation</li> </ul>
Racially/ Ethnically Concentrated Areas of Poverty	Not applicable	Not applicable
Disparities in Access to Opportunity	<ul> <li>Availability of affordable units throughout the county</li> <li>Need for employment skills training</li> </ul>	Availability, type, frequency, and reliability of public transportation
Disproportionate Housing Needs	<ul> <li>Availability of affordable units throughout the county</li> <li>Deteriorated and abandoned property</li> <li>Homeownership gap</li> </ul>	Lack of affordable, integrated housing for individuals who need supportive services
Publicly Supported Housing Location and Occupancy	Source of income discrimination	Community opposition

Disability and Access Issues	Lack of affordable, accessible housing in range of unit sizes     Land use and zoning laws	<ul> <li>Access to transportation for persons with disabilities</li> <li>Inaccessible government facilities or services</li> <li>Inaccessible sidewalks, pedestrian crossings, or other infrastructure</li> <li>Lack of affordable, integrated housing for individuals who need supportive services</li> </ul>
Fair Housing Enforcement, Outreach Capacity, and Resources	Lack of resources for fair housing agencies and organizations	<ul> <li>Lack of state or local fair housing laws</li> <li>Lack of local private fair housing outreach and enforcement</li> <li>Lack of local public fair housing enforcement</li> </ul>

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement
1. Increase availability of affordable housing	<ul> <li>Availability of affordable units throughout the county</li> <li>Homeownership gap</li> <li>Source of income discrimination</li> </ul>	<ul> <li>Segregation/Integration</li> <li>Disparities in Access to Opportunity</li> <li>Disproportionate Housing Needs</li> <li>Publicly Supported Housing Location and Occupancy</li> </ul>	<ul> <li>Support feasible Low Income Housing Tax Credit applications through letters of endorsement or investment of CDBG funds</li> <li>Contact affordable housing developers working in the Atlanta area to promote LIHTC opportunities in Cherokee County</li> <li>Conduct outreach to encourage private sector landlords, including those in high opportunity areas and accessible via CATS, to participate in the HCV program</li> <li>Continue work with Habitat for Humanity and other local partners to increase homeownership opportunities and downpayment assistance for qualified households.</li> <li>Explore opportunities to fund a Tenant-Based Rental Assistance (TBRA) program to assist low income households in securing housing</li> </ul>
should seek opportunities working in Cherokee Coun also identified by stakehold sector landlords to encour	for Low Income Housing Tax Credit dev ty and providing letters of support for o ders as an issue in the County. To increa	relopments, including conducting outreach developers' applications. A lack of housing ase the pool of landlords who accept vouch Additional funding sources for TBRA, such	Iffordability in Cherokee County. The County to potential developers to interest them in that accepts Housing Choice Vouchers was ers, the County should reach out to private as through the state's HOME program,
2. Expand access to opportunity in low and moderate income areas	<ul> <li>Continued need for community revitalization</li> <li>Need for employment skills training</li> </ul>	<ul> <li>Segregation/Integration</li> <li>Disparities in Access to Opportunity</li> </ul>	<ul> <li>Continue making needed infrastructure improvements in low and moderate income areas</li> <li>Provide funding for employment skills training and job search assistance through a qualified local organization</li> </ul>

residents who should conta as infrastructure improven	inue to be served by community developments to enhance the physical aspects of		nity. These activities may include things such ts or financial support to local organizations
3. Address substandard housing	Deteriorated and abandoned property	Disproportionate Housing Needs	<ul> <li>Identify areas of the county in need of enhanced code enforcement efforts to address substandard and deteriorated housing</li> <li>Provide funding to assist low and moderate income homeowners make needed home repairs</li> </ul>
address the physical condi- improvements are made. T emergency and other need	tion of units, the County should enhance The County should also continue partner	ring with local organizations to assist low a	property owners to ensure that necessary
4. Increase accessible housing options for people with disabilities	<ul> <li>Lack of affordable, accessible housing in range of unit sizes</li> <li>Land use and zoning laws</li> </ul>	Disability and Access Issues	<ul> <li>Amend the Zoning Ordinance to clarify the requirement that residents of personal care homes be ambulatory and to remove the minimum spacing requirement</li> <li>Adopt a reasonable accommodation ordinance outlining the process by which persons with disabilities may request accommodations to zoning, land use, and other regulatory requirements</li> <li>Continue the Volunteer Aging Council work in making home modifications for seniors and persons with disabilities</li> </ul>

**Discussion:** Three provisions of Cherokee County's zoning code are recommended for review and revision to be more complaint with the Fair Housing Act and further fair housing choice: 1) The requirement that group home occupants be ambulatory should be reviewed and clarified; 2) Minimum spacing requirements for group homes should be eliminated; and 3) A reasonable accommodation ordinance should be adopted to include specifics regarding the form that a request for accommodation should take, the time frame within which the reviewing authority must make a decision, the form that decision must take and whether conditions may be attached; and how to appeal a decision. In addition to zoning changes, the County should continue to look for ways to improve the availability of affordable, accessible housing, including through LIHTC developments and continued home modifications by the Volunteer Aging Council.

## 5. Provide fair housing education and outreach to protected classes

- Private discrimination
- Lack of resources for fair housing agencies and organizations
- Fair Housing Outreach, Enforcement Capacity, and Resources
- Allocate a portion of CDBG funding for a competitive grant to a nonprofit organization to provide fair housing education to residents and landlords
- Identify and contact community leaders in Cherokee County's Latino community to discuss opportunities for expanding fair housing education, including to Spanish speakers with limited English proficiency.

**Discussion:** Cherokee County lacks sufficient education resources and capacity to ensure fair housing for its residents. To increase the resources available locally, the County should annually set aside a portion of its CDBG funds to be sub-granted to a responsive local organization that will implement a program of education and awareness. Specifically, the grant recipient should focus on educating landlords about their Fair Housing Act responsibilities, and the public on how to recognize discrimination and how to file a complaint. Specific outreach should be conducted to Cherokee County's Latino community to ensure that fair housing education materials are provided to Spanish speakers with limited English proficiency.

### **Appendix I: Citizen Participation Record**

Public Notices, Flyers, and Sign-In Sheets

### CHEROKEE COUNTY PUBLIC NOTICE OF COMMUNITY MEETINGS FOR THE ASSESSMENT OF FAIR HOUSING

The Cherokee County CDBG Program Office is preparing an Assessment of Fair Housing. This study will discuss patterns of race, housing, and poverty; access to opportunity; and housing needs in the county. It will also outline strategies the County will take to improve fair housing. The study is required by the U.S. Department of Housing and Urban Development for jurisdictions that receive community development and affordable housing grant funds.

The opinions and perceptions of local residents are an important part of this study. To provide input, all residents are invited to attend public meetings and participate in a survey. Meetings will be held at the following dates, times, and locations, and are open to the general public. Refreshments will be served and children are welcome.

Meeting 1
Monday, December 11<sup>th</sup>, 2017, 4:00 PM
Next Step Ministries, Inc.
7709 Turner Road
Woodstock, GA 30188

Meeting 2 Tuesday, December 12<sup>th</sup>, 2017, 10:30 AM 111 Brown Industrial Parkway Canton, GA 30114

Meeting 3 Wednesday, December 13<sup>th</sup>, 2017 1:00 PM 1001 Univeter Road Canton, GA 30115

The survey is available online at <a href="www.surveymonkey.com/r/CherokeeAFH">www.surveymonkey.com/r/CherokeeAFH</a> or in print at the listed public meetings. More information about the Assessment of Fair Housing can be found on the County's website at <a href="http://www.cherokeega.com/CDBG">http://www.cherokeega.com/CDBG</a> and a draft of the study will be available there in late January 2018.

#### **Other Information**

Persons needing special accommodations or needing to request interpretation should contact Laura Calfee at (770) 721-7807.

Cherokee County supports Equal Opportunity and Fair Housing and does not discriminate in any of its CDBG Programs on the basis of race, color, creed, ethnicity, sex, familial status, age, religion, disability, gender identity, or sexual orientation.

## FAIR HOUSING MEETINGS

The Cherokee County CDBG Program
Office is working to identify patterns
of segregation; racially and ethnically
concentrated areas of poverty; disparities in
access to opportunity; and disproportionate
housing needs as part of an Assessment of
Fair Housing.

Please plan to attend one of the community meetings for a discussion of these important issues. Your input will inform and help shape fair housing in the County for years to come.

As an active resident of Cherokee County, your input is needed!





### **MEETING SCHEDULE**

### Monday, December 11

1:00 p.m. Canton City Hall 151 Elizabeth Street Canton, GA 30114

4:00 p.m. Next Step Ministries 7709 Turner Road Woodstock, GA 30188

### Tuesday, December 12

10:30 a.m. MUST Ministries 111 Brown Industrial Parkway Canton, GA 30114

### Wednesday, December 13

1:00 p.m. Cherokee County Senior Services 1001 Univeter Road Canton, GA 30115

Refreshments will be provided and children are welcome.

Learn more about the Assessment and how you can get involved by visiting the website: www.cherokeega.com/CDBG

You may also contribute to the process by taking the survey on the website.

Persons needing special accommodations or needing to request interpretation should contact Laura Calfee at (770) 721-7807. Cherokee County supports Equal Opportunity and Fair Housing and does not discriminate in any of its CDBG Programs on the basis of race, color, creed, ethnicity, sex, familial status, age, religion, disability, gender identity, or sexual orientation.





Please join us for a conversation about housing in Cherokee County. As an active resident, we need to hear from you!

- What features do you look for when choosing a place to live?
- What barriers limit the range of housing options available to you?
- What programs are offered to expand opportunity for residents of public housing?
- Do you know what to do if you feel you have experienced housing discrimination?







Monday, December 11 1:00 p.m.

Canton City Hall 151 Elizabeth Street Canton, GA 30114

As a thank you for your participation, we will have a

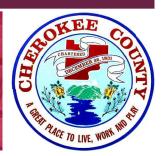
### FREE HOLIDAY GIFT

for everyone who attends!

Learn more about the County's Assessment of Fair Housing and other ways you can get involved by visiting:

www.cherokeega.com/CDBG

You may also contribute to the process by taking the survey on the website.







Please join us for a conversation about housing in Cherokee County. As an active resident, we need to hear from you!

- What features do you look for when choosing a place to live?
- What barriers might limit the range of housing options available to you?
- Does Cherokee County have enough housing that is accessible to people with disabilities?
- Do you know what to do if you feel you have experienced housing discrimination?







Monday, December 11 4:00 p.m.

Next Step Ministries, Inc. 7709 Turner Road Woodstock, GA 30188

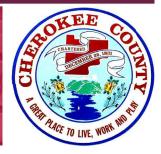
FREE
REFRESHMENTS
WILL BE PROVIDED

We look forward to hearing from you!

Learn more about the County's Assessment of Fair Housing and other ways you can get involved by visiting:

www.cherokeega.com/CDBG

You may also contribute to the process by taking the survey on the website.







Please join us for a conversation about housing in Cherokee County. As an active resident, we need to hear from you!

- What features do you look for when choosing a place to live?
- What barriers might limit the range of housing options available to you?
- Does Cherokee County have enough housing that is accessible to people with disabilities?
- Do you know what to do if you feel you have experienced housing discrimination?







Tuesday, December 12 10:30 a.m.

MUST Ministries 111 Brown Industrial Parkway Canton, GA 30114

FREE REFRESHMENTS WILL BE PROVIDED

We look forward to hearing from you!

Learn more about the County's Assessment of Fair Housing and other ways you can get involved by visiting:

www.cherokeega.com/CDBG

You may also contribute to the process by taking the survey on the website.







Please join us for a conversation about housing in Cherokee County. As an active resident, we need to hear from you!

- What features do you look for when choosing a place to live?
- What barriers might limit the range of housing options available to you?
- Does Cherokee County have enough housing that is accessible to people with disabilities?
- Do you know what to do if you feel you have experienced housing discrimination?







Wednesday, December 13
\_\_\_\_\_ 1:00 p.m.

Cherokee County Senior Services 1001 Univeter Road Canton, GA 30115

As a thank you for your participation, we will have a

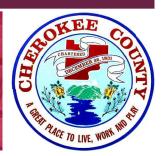
### FREE HOLIDAY GIFT

for everyone who attends!

Learn more about the County's Assessment of Fair Housing and other ways you can get involved by visiting:

www.cherokeega.com/CDBG

You may also contribute to the process by taking the survey on the website.









Location: Country City Hall

		(		
Name	Organization (if Applicable)	Phone	Email	Address
Hudson, Marzine	CHA	770-479-4969	770-479-4969 Mhudson @cantonha,ora	
acquelyn lobers	0±0	770-479-4969	770-479-4969 Noberg @ ran ton ha, ora	
Laura Calfee	Charakeela CDBG	(770) PAI-1807		1130 Blues Pluay Control GA
				3//4



Location: Next Step Ministnes

						0	Lisa Rowling	Rich Wedelind	Ted Rolinson	Namey Stull	Manya Wett	Name
										8		Organization (if Applicable)
						,		678-467-2334		1678-549-3231	170-518-93%	Phone
	N. Carlotte						lisarauling bellsouthing	rich openimeter groders. S.	PLANTGUYWTR O ATT.NET	nanexhull 7770 amail.com	marily not out, not	Email
										`	Marietta GA Sooby	Address



Location: Next Step Mini Striet

Name	Organization	Phone	Email	Address
7				
Aluxon Carter	0	(678) 654-9378	(C78) 654-9378 Aluxon Charteral not. con	202 Engly Childraphtoch Gr. 301
April Moss		278.458.0381 ape_leigh@		4218 N. ALMOLD MILL RO.
Lon Baker	8	£841 965	Lationextstephinistries. Met 7709	tar her
Most Mycor	NI II	7)905-5110	7)905-5710 MOHAMCCOY 8 OSWARD COM	
Jan				
=				



Date: 12/11/17
Location: Next Step Minismes

Name	Organization (if Applicable)	Phone	Email	Address
Inbbr Cooper		4.895.3871	4.895.3871 bulba cooper out, not	4342 HARLEGE TERILLE
Laura Caltee	Charles CDBG	1081-162(011)		130 Bluffs Pres Canton 30114

Location: Date: December 12, 2017

					AGESA TONES	a lactor	Tiffiney Mwaura	Rhonda Hall	Rachel Castillo	Nate Marsh	Laura Cartee	Glanna Ellis	Name
		5			Musj	MAT	Mus+	MWST	MUST	MUST	Characters. CDBG		Organization (if Applicable)
					678-623-3143 Futurerainhouse Internal	470-226-6002 entradalton SS/Que	678 542 0442 +mwaura@yaharan	7)990-3803 challe mustimustres, org	7) 790.3875 rcashllo@mushminishnin.org	770,721,2925 NMARCSHEMOSTMINISTRIES.ORG	(70)721-1807 (calfee@ellerokeega.com	(N 52240483819	Phone Email
					Casta must	la Carta	3	B 11 P1	13 11	1407 Cobjb Robing No. AC	1130 But of Rend Conton, OA30 m	520 Herndon Homes	Address

Location:

Bounda Hollomita Name Bonny TIVCE of malorg る。一方のできる LUITOR / (ALONE Organization (if Applicable) Voluntion. 770-312-4315 470-302-4737 Phone 7/432-9075 7/851-3054 bonny crokin a windstrong vot Ridge Cu. white GA 3084 5173214475 650-121-07/2 VINCE, SWIFTE COM CAST, NET VACJUdy. day, acquello Email Y/B gMAIL.CC 1027 Hunter C.W. 28106 Spectalog. 30186 Address 145 Aspen C+ 30188 Bay Dundan

Location: Cherokte County Senior Services

				//	nettic Elmoro	Louise Barrow	BOAY Hasuin	JIMMY /CIGUSON SV.	Roma Molline	AL SADUBBIN	JOHN HOLLING-SHEAD	PATT OPPRIC	BOB OUTRA	Name
													0	Organization (if Applicable)
					6786560093	7709248215	678-464-1731 com	770-949-8330	770-592-2813				843 JH1 478	Phone
	-				6786560093 NETTIECLM @XALOO.		60 (egma, 1						843, 7474750 Konsuts 769 meis, com	Email
					SHAU C	100 Raceled Dieux agross	Canton BA 30114	113 Westorks P/.	409 Wayton he wood	CANTON SA SONG		Courter SA . 30/14/	186 Ridgiment POAD	Address

\* Survey

Location: Cherokee County Seniar Services

Laura Calle		Ron Kirssel	Dear Groney	Transi for lots	Doyac EVANS Marka Seatt	Carol Seversin	Name
Cherokee (builty CDBG) Mice (770) 721-7807	5			11 11	: + +	(if Applicable)  Senior center	Organization
ce (170)721-7807	2	324	674630	4/970-8497	770- 926-6388	678-880-9731	Phone
I calfee e cherokecga, com	work strold MM Rd	ronkriss all bell south					Email
1130 Blue As Plany Canton Soll	3403	Conton & 30 15	200 Store CA 36114	Acword, GA Perry #	326 Howeysuckle Tell 200 Below Cone,	412 Argonne Ter	Address

### **PUBLIC NOTICE**

### HEARING AND COMMENT PERIOD FOR FAIR HOUSING REPORT

Cherokee County invites members of the public to review and offer comments on its **2018 Analysis of Impediments to Fair Housing Choice**.

### Background

The County, as a recipient of federal grant funds under the Community Development Block Grant Program, must periodically conduct a fair housing study known as an Analysis of Impediments to Fair Housing Choice, or AI. The AI studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs. Based on the findings of this research, the AI proposes strategies to overcome the identified fair housing issues.

### **Public Review Period**

The 2018 Analysis of Impediments will be available for public review and comment from March 9 to April 9, 2018. The document may be downloaded from the CDBG page on the County's website (www.cherokeega.com/CDBG) or may be viewed in the CDBG Program Office located at 1130 Bluffs Parkway, Canton, Georgia 30114.

### **Public Hearing**

A Public Hearing will be held at which the County will present information on the AI and receive comments from the public regarding the draft. The Hearing will be held on Tuesday, March 27 at 10:00 a.m. in the BOC Executive Conference Room on the upper level of the County Government Building located at 1130 Bluffs Parkway, Canton, Georgia 30114.

### **To Make Comments**

The County will receive written comments until 5:00 p.m. local time on April 9, 2018. Comments regarding the AI may be emailed to lcalfee@cherokeega.com or may be mailed or physically delivered to the Cherokee County CDBG Program Office, Attn: Laura Calfee, 1130 Bluffs Parkway, Canton, Georgia 30114. Alternatively, comments may be made orally at the Public Hearing described above.

### **Other Information**

Persons needing special accommodations or needing to request interpretation should contact Laura Calfee at (770) 721-7807. Cherokee County supports Equal Opportunity and Fair Housing and does not discriminate in any of its CDBG Programs on the basis of race, color, creed, ethnicity, sex, familial status, age, religion, disability, gender identity, or sexual orientation.



Location: Cherries Ba Chategoce Room - 1130 Bluff Phy

		The									 
Address	1130 But As Phuylaston, GA	1130 Bluffs Ryy, Gambon,	1130 Bluffe Pleur, Conton, Coth	130 Bulk Plu Carlo 3014							
Email	Chankee (bunkubb (710) 721-7807 (alfee ahunkey. CM	(678)493-6106 MSHILMS@Cherokeep.com 1130 Bluffs Ruy, Campa, 574	(678-)493-6102 dcg renberg@churcher.com 1130 Bluffo Phuy, Combon (4A	770 721 7806 Kalsoschachen Mergaun 1130 Bluff Plus Carlo 3014				11			
Phone	1082-161 (016)	9019-85/(819)	2019-843-6102	170 721 7806							
Organization (if Applicable)	Chenkee County cobs			Charle 6 CBB							
Name	loura Cathel	Margaret Stallings Cherokee Planning	David Grenberra	Visti Bosel							

### **Appendix II: Zoning Analysis Matrix**

Because zoning codes present a crucial area of analysis for a study of fair housing, the latest available Cherokee County Zoning Ordinance was reviewed and evaluated against a list of ten common fair housing issues. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

- 1 = low risk the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;
- 2 = medium risk the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;
- 3 = high risk the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following matrix lists the 10 issues reviewed, Cherokee County's score for each issue, citations to relevant statutes and code sections, and explanatory comments.

### Zoning Analysis Matrix - Cherokee County, Georgia

Average Total Risk Score: 2.0

### Key to Risk Scores:

- 1 = low risk the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice.
- 2 = medium risk the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread.
- 3 = high risk the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

### **Source Documents:**

Zoning Ordinance of Cherokee County, Chapter 70 of the Code of Ordinances, updated Sept. 29, 2017, available at https://library.municode.com/ga/cherokee\_county/codes/zoning

Code of Ordinances, updated Sept. 29, 2017, available at https://library.municode.com/ga/cherokee\_county/codes/code\_of\_ordinances

Issue	Conclusion	Risk Score	Comments
1a. Does the jurisdiction's definition of	The County's zoning	2	See Zoning Ord. Sec. 4.3
"family" have the effect of preventing	code defines family as		(definitions)
unrelated individuals from sharing the	"[a]n individual, or		
same residence? Is the definition	two or more persons		Domestic servants
unreasonably restrictive?	related by blood,		employed on the
	marriage, adoption or		premises may be
	guardianship, or a		housed on the
	group of not more		premises without
	than four unrelated		being counted as a
	persons, occupying a		separate family or
	single dwelling unit."		families.
	This definition is		
	neither the most		While the Supreme
	permissive nor most		Court has recognized a
	restrictive. More		local government's
	permissive definitions		right to limit the
	of family define it in		number of unrelated
	terms of a functional		individuals who may
	family or common		live together as
	household sharing		constitutionally

	common space, meals,		permissible, the
	and household		restriction must be
	responsibilities,		reasonable and not
	and/or leaves		exclude a household
	maximum occupancy		which in every sense
	per dwelling as a		but a biological one is a
	matter of safety		single family. An
	regulated by the		unreasonably, or
	building code rather		arbitrarily, restrictive
	than the zoning		definition could violate
	regulations.		state Due Process
			and/or the federal FHA
1b. Does the definition of "family"	The term "family"		as it may have a
	does not include any		disproportionate
, ,	organization or		impact on people with
	institutional group,		disabilities, minorities,
	which could be read to		and families with
	exclude a group of		children. Another
	unrelated individuals		
	with disabilities		option is to amend the
			ordinance to add an
	residing together in a		administrative process
	licensed personal care		for rebutting the
	home. However,		presumption that a
	whereas a		group exceeding the
	conventional single-		permitted maximum
	family dwelling		number of unrelated
	permits a group of not		persons is not
	more than 4 unrelated		otherwise residing
	individuals, the		together as a single
	personal care		housekeeping unit and
	regulations permit up		functional family.
	to 6 unrelated		_
	individuals. See Issue		
	2 below.		
2a. Does the zoning code treat housing for	A small personal care	3	See Sec. 4.3 (definition
_	home (or community		of personal care home);
	living arrangement)		7.7-17 (permitted uses
	may house up to six		additional
11	"ambulatory"		requirements).
• •	residents. A small		i oqui omonioj.
	personal care home is		Personal care home. "A
	permitted in the AG		licensed home where
9	and all residential		residents are provided
*			with housing, meals
	districts. While		and 24 hours per day
_	allowing six residents		assistance with
OTC /	per dwelling is more		assistalice Willi

2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?	permissive than the ordinance's definition of family being limited to four unrelated residents, the caveat that the residents be ambulatory discriminates against persons who rely on a wheelchair or other mobility equipment. It is discriminatory for an ordinance to favor people with certain disabilities (or no disabilities) but treat differently people with other types of disabilities by imposing additional restrictions. Additionally, siting is limited by minimum spacing requirements, which is addressed below in Issue 4.		essential activities of daily living, such as bathing, grooming, dressing, etc. but no medical or nursing care is provided."
3a. Do the jurisdiction's policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	The County has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements.  Model reasonable accommodation ordinances are available and should include specifics regarding the form that the request should take; the time frame	2	See Table 14.1 and 14.2; Sec. 15.14(B) (variance process).  Table 14.1: permit application and appealing process indicates the process of applications for development permit and building permit; seeking variances, special exceptions or appeals to zoning board of appeals.  Table 14.2: rezoning and special use permit application process

3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?

within which the reviewing authority must make a decision; the form that a decision must take and whether conditions may be attached; and how to appeal a decision.

The ordinance provides a process for requesting a hardship variance from the Zoning Board of Appeals, following the public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or

indicates the process of seeking amendments of zoning ordinance and application for special use permit.

The code provides a process for requesting a variance. However, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or owing to conditions peculiar to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents.

	<del></del>		
	threats to safety may		
	impact the outcome.		
4. Does the ordinance impose spacing or	Yes, in all residential	3	See Sec. 7.7-17(a)(5).
dispersion requirements on certain	districts where a small		Spacing requirements
protected housing types?	personal care home		for protected classes
	(of up to six residents)		such as persons with
	may be sited, no home		disabilities are
	may be operated		generally inconsistent
	within 1,000 feet of		with the FHA, unless
	any other residential		the jurisdiction could
	care facility. No		make a showing that
	legislative or		the ordinance was
	governmental		passed to protect a
	justification for the		compelling
	spacing is included in		governmental interest
	the ordinance.		(e.g. over-
			concentration of
			residential treatment
			homes could adversely
			affect individuals with
			disabilities and would
			be inconsistent with
			the goal of integrating
			persons with
			disabilities into the
			wider community) and
			that the spacing
			requirement is the least
			restrictive means of
			protecting that interest.
			The County's spacing
			requirements limit the
			overall aggregate
			capacity of housing for
			persons with
			disabilities even if the
			need in the community
			or region is greater
			than the thresholds
			permit. It is
			recommended that the
			spacing requirement be
			repealed or that an
			ordinance be adopted
			to provide a process for

	requesting a reasonable accommodation or a means of rebutting the presumption of overconcentration by showing the significant need for more housing for persons with disabilities.
--	--

	1		
5. Does the jurisdiction restrict any	Besides the broad	2	See Table 7.2
inherently residential uses protected by	category of "personal		(Permitted Use Table);
fair housing laws (such as residential	care home," the		Sec. 7.7-17(a).
substance abuse treatment facilities) only	substantive provisions		
to non-residential zones?	of the County's code do		
	not distinguish or		
	separately regulate		
	housing for persons		
	recovering from		
	alcohol or substance		
	abuse. The Permitted		
	Use Table indicates		
	that "Residential		
	Mental Health and		
	Substance Abuse		
	Facilities" are a		
	restricted use in the		
	AG and Residential		
	districts, and		
	references Sec. 7.7-		
	17(a). However, Sec.		
	7.7-17(a) provides		
	additional		
	requirements for		
	"small personal care		
	homes and child		
	rearing institutions"		
	and does not explicitly		
	speak to mental health		
	or substance abuse		
	facilities as a separate		
	use category.		
	According to Table 7.2,		
	"residential mental		
	health and substance		
	abuse facilities" are an		
	open use in the		
	nonresidential OI, NC,		
	and GC districts		
6. Does the jurisdiction's zoning and land	The zoning ordinance	2	See Sec. 7.1 et seg.;
use rules constitute exclusionary zoning	contemplates various	4	Table 7.1 (Minimum
that precludes development of affordable	_		District Development
	housing types		_
or low-income housing by imposing	including single-family,		Standards); Sec. 8.1 et
unreasonable residential design	single-family attached		seq. (Traditional
regulations (such as high minimum lot	(duplex, triplex,		Neighborhood

sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?

quadplex), townhomes, multifamily. manufactured, and mixed-use. However, there are 8 singlefamily districts (plus the AG district) which only permit singlefamily detached housing. Large minimum lot sizes limit density as it ranges from 2-5 acres in AG; 80,000 sq. ft. in R-80; 60,000 sq. ft. in R-60; 40,000 sq. ft. in R-40; 30,000 sq. ft. in R-30; 20,000 sq. in R-20; and 15,000 sq. ft. in R-15. The lowest and most permissive minimum lot sizes are in the RD-3 district at 7,500 sq. ft. per lot and 3,800 sq. ft. per lot in the RZL district. However, the RD-3 district also requires a minimum of 30% of open space per lot and the RZL district requires a minimum site area of 5 acres. Maximum densities range from 0.2 u/a in AG district, 0.5 u/a in R-80, 0.75 u/a in R-60, 1 u/a in R-40, 1.5 u/a in R-30, 2 u/a in R-20, 3 u/a in R-15 and RD-3, and 6 u/a in the RZL district. Duplex, triplex, quadplex, townhomes, and cluster

Development); Sec. 23.1 et seq. (Conservation Design Community).

Cluster developments, where permitted in the RZL and R-A districts are "a form of development for residential subdivisions that permits a reduction in lot area requirements, provided there is no increase in the number of lots that would normally be permitted under conventional zoning and subdivision requirements." So overall, cluster developments do not increase density beyond the conventional zoning district standards.

developments are permitted in the R-A district, with a minimum site area of 2 acres and maximum units per acre not exceeding 8. Townhomes in the R-TH district require a minimum 3 acres of site area, minimum 5,000 sq. ft. lot area per unit, and maximum 8 u/a density. The Traditional Neighborhood Development Ordinance may allow for greater residential density, but it also requires a minimum 20-250 acres site. which limits the feasibility of infill development. The **Conservation Design** Community ordinance also may allow smaller minimum lot sizes but maximum density for the development site must be neutral or the same as the underlying conventional zoning district.

Overall, these development standards may unreasonably affect the feasibility of developing affordable single family detached and attached housing within the jurisdiction.

7a. Does the zoning ordinance fail to	Multifamily housing is	2	See Sec. 7.1 et seq.;
provide residential districts where multi-	permitted by right in		Table 7.1 (Minimum
family housing is permitted as of right? Are	the RM-10 district with		District Development
multifamily dwellings excluded from all	a maximum density of		Standards); Sec. 8.1 et
single family dwelling districts?	10 u/a and the RM-16		seq. (Traditional
	district with a		Neighborhood
7b. Do multi-family districts restrict	maximum density of		Development).
development only to low-density housing	16 u/a. Both of these		
types?	districts require a		
	minimum 2 acre site.		
	Maximum lot coverage		
	is 35%. Mixed-use		
	developments may be		
	approved in the		
	Traditional		
	Neighborhood		
	Development.		
	Although higher		
	densities may be		
	approved in the TND		
	district, density does		
	not necessarily equate		
	to affordability		
	especially where		
	development costs are		
	increased due to		
	additional layers of site		
	and design regulations,		
	architectural and		
	premium building		
	materials standards,		
	amenities, and		
	streetscape and		
	parking requirements.		
	Compared to other		
	jurisdictions, the		
	regulations for		
	multifamily housing		
	may limit the		
	feasibility of		
	developing an		
	units of affordable		
	multifamily housing.		
	adequate number of units of affordable		

	1	ı	T
8. Are unreasonable restrictions placed on	"Guest houses" as an	1	See Sec. 5.6-11 (guest
the construction, rental, or occupancy of	accessory structure		house); 7.7-1
alternative types of affordable or low-	are allowed in the AG		(manufactured
income housing (for example, accessory	and all residential		housing).
dwellings or mobile/manufactured	districts. The		
homes)?	regulations do not		There is opportunity to
	specify, however,		expand accessory
	whether a guest house		dwelling units as an
	may or may not be		expressly permitted
	rented to another		alternative and low-
	individual or family.		impact form of
	Single-wide		affordable housing,
	manufactured homes		especially in low
	are permitted in the		density areas where
	AG district on a		large lot sizes would
	minimum lot of 2		easily accommodate
	acres. Otherwise		accessory dwellings
	manufactured homes		and additional off-
	also are permitted in		street parking.
	the R-80, R-60, R-40,		
	R-A, and RTH districts		
	where additional		
	regulations are met.		
9a. Are the jurisdiction's design and	The County follows the	1	See Code of Ordinances
construction requirements (as contained	State Minimum		Sec. 14-1 et seq.
in the zoning ordinance or building code)	Standard Codes,		_
congruent with the Fair Housing	O.C.G.A. § 8-2-20(9),		
Amendments Act's accessibility standards	which currently		
for design and construction?	incorporates the 2012		
	International Building		
	Code, with Georgia		
	amendments. While		
	the 2012 IBC edition is		
	not one of the ten		
	HUD-recognized safe		
	harbors for compliance		
	with the FHA's design		
	and construction		
	requirements, it is		
	substantially similar to		
	the 2006 IBC which		
	HUD has recognized as		
	a safe harbor for		
	meeting the FHA's		
	accessibility		

9b. Is there any provision for monitoring compliance?	requirements. In addition, Chapter 11 of the 2012 IBC requires that buildings and facilities comply with the accessibility requirements of ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities standard, which is a nationally recognized standard for making buildings accessible.  The County's Building Department is authorized to administer and enforce the construction codes as required by state		
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	The zoning ordinance does not expressly provide density bonuses or incentives for the development of affordable or lowincome housing or housing for protected classes. However, a developer may seek a reduction or waiver of impact fees upon a showing that the development will "encourage affordable housing." Encouraging affordable housing is not as strong as requiring or guaranteeing affordable housing units.	2	See Code of Ordinances Sec. 32-35(q)(2)(d).  "The board may recommend a waiver of said [impact] fees, in whole or in part, upon a finding that a development project is determined to create extraordinary economic development and employment growth or encourage affordable housing. Upon such recommendation, the matter shall be referred to the Board of Commissioners of Cherokee County"

## **Appendix III: Public Survey**

In conjunction with development of the Analysis of Impediments to Fair Housing Choice, Cherokee County conducted a survey to collect input from a broad spectrum of residents and other stakeholders. The survey was available online and in hard copy in both English and Spanish from November 28, 2017 through January 2, 2018. A total of 27 respondents took the survey. Copies of the English and Spanish-language survey instruments, as well as a report of the full survey results, is included in this Appendix.

#### Your Opinion Counts!

Cherokee County is working on a study to assess fair housing and social equity in the community. This study, called an Assessment of Fair Housing, is required by the U.S. Department of Housing and Urban Development (HUD) so that the county may continue to receive federal funds for housing and community development. The study will look at whether everyone in Cherokee County has similar choices for housing regardless of their race, ethnicity, national origin, sex, religion, whether they have children, or whether they have a disability. It will also outline a plan to address any fair housing issues that may be identified.

An important part of this study is hearing from members of the public on issues of fair housing and housing choice. This survey is one way we'll gather input.

Your answers are confidential. We'll only report this information in combination with other survey responses and in summary format to protect your privacy. Please do not write your name or other personal information anywhere on the survey. You may stop the survey at any time without losing any benefits that you otherwise receive. If you have questions, contact Mosaic Community Planning at info@mosaiccommunityplanning.com or 770-366-7893.

Estimated time to complete: 7-10 minutes

$\sim$ 1		$\sim$			
( 'hero	VAA	County	Hair Ho	บบเอเมณ	SHIPVAV

#### **General Information**

1. Please select the area where you live.	
2. Which is your age group?	
Under 18	45-54
18-24	55-61
25-34	62-74
35-44	75+

3. V	Vhat is your total household income?		
	Less than \$10,000		\$35,000 to \$49,999
	\$10,000 to \$14,999		\$50,000 to \$74,999
	\$15,000 to \$24,999		\$75,000 to \$99,999
	\$25,000 to \$34,999		\$100,000 and above
4. V	Vhat is your race/ethnicity?		
	White		Asian or Pacific Islander
	African American or Black		Native American or Alaska Native
	Latino or Hispanic		Multiple races
	Other (please list):		
5. D	oes anyone in your home regularly speak a langu	uage	other than English?
	No		
	Yes, please list the language:		
6. D	Does anyone in your home have a disability?		
	No		
	Yes		
0			
7. V	Vhat is your current housing status?		
	I own a home	$\bigcirc$	I am homeless
	I rent a home		I live with a relative
	I live in a hotel/motel		
	Other (please list):		
8. D	o you currently live in public housing or receive S	Sectio	n 8 rental assistance?
	No		
	Yes		

### About Your Neighborhood

9. How satisfied are you w	ith the neighbor	hood where you live?		
Very satisfied		Not very s	atisfied	
Somewhat satisfied		Not at all s	eatisfied	
10. What do you like best	about your neigl	hborhood?	_	
11. What improvements w	ould you like to	see?		
12. Is there another area i	n Cherokee Cou	unty where you would like	to move?	
O No				
Yes, please list where and	why you would choo	ose that area:		
10 10 10 10 10 10 10 10 10 10 10 10 10 1		A- Al f-IIi		
13. In your neighborhood,	Yes	Somewhat	No	l don't know
Quality public schools				
Reliable bus service				
Areas with jobs you could get		0		
Places to shop and bank				
Housing that you can afford		$\circ$		
Housing that is in good condition		$\bigcirc$		
Parks and trails				
Clean environment				

out Cherokee Count	у			
14. Thinking about Che housing types below.	erokee County, please	e check whether you t	hink more is needed	for each of the
nousing types below.	No more is needed	Some more is needed	A lot more is needed	I don't know
Housing for people with disabilities	0	0	$\circ$	
Housing for seniors		$\bigcirc$		
Housing that people with lower incomes can afford			0	0
Housing that accepts Section 8 vouchers				
Apartments				
First time homebuyer				
assistance Please share any other com	ments about local housing	g needs:		
Please share any other com	erokee County, please		hink each of the follo	wing are equally
Please share any other com	erokee County, please			wing are equally
Please share any other com	erokee County, pleasen all areas.	e check whether you t		
Please share any other com 15. Thinking about Che available and kept up in	erokee County, pleasen all areas.	e check whether you t		
Please share any other com  15. Thinking about Che available and kept up in	erokee County, pleasen all areas.	e check whether you t		
Please share any other com  15. Thinking about Che available and kept up in  Schools  Bus service	erokee County, pleasen all areas.	e check whether you t		
Please share any other com  15. Thinking about Che available and kept up in  Schools  Bus service  Roads and sidewalks  Grocery stores and other	erokee County, pleasen all areas.	e check whether you t		
Please share any other com  15. Thinking about Che available and kept up in  Schools  Bus service  Roads and sidewalks  Grocery stores and other shopping	erokee County, pleasen all areas.	e check whether you t		
Please share any other com  15. Thinking about Che available and kept up in  Schools  Bus service  Roads and sidewalks  Grocery stores and other shopping  Banking and lending	erokee County, pleasen all areas.	e check whether you t		
Please share any other com  15. Thinking about Che available and kept up in  Schools  Bus service  Roads and sidewalks  Grocery stores and other shopping  Banking and lending  Parks and trails	erokee County, pleasen all areas.	e check whether you t		

Fair Housing Rights
16. Do you understand your fair housing rights?
Yes
Somewhat
O No
17. Do you know where to file a housing discrimination complaint?
Yes
Somewhat
○ No
18. Since living in Cherokee County, have you experienced housing discrimination?
The following actions are examples of housing discrimination if they are based on race, ethnicity, national origin, sex, religion, whether you have children, or whether you have a disability: refusing to rent or sell housing, refusing to discuss the rental or sale of housing, saying that housing is not available for rent or sale when it is, having different rental or sale terms, or providing different housing or housing services.
Yes
○ No
Cherokee County Fair Housing Survey
19. Who discriminated against you? (Check all that apply)
Landlord or property manager Mortgage lender
Real estate agent City or county staff person
Other (please list):

20. On what ba	sis do you believe you were discrimina	ated	against? (Check all that apply)
Race			Sex
Ethnicity			Disability
National origi	n		Familial status (single parent with children, family with children, expecting a child)
Religion			children, expecting a childy
21. Did you file	a report of that discrimination?		
Yes			
○ No			
22. If you answ	ered NO, why didn't you file?		
I didn't know	what good it would do		I was afraid of retaliation
I didn't know	where to file		The process wasn't in my language
I didn't have t	ime to file		The process wasn't accessible to me because of a disability
I didn't know	it was a violation of the law		
Other, please	list:		
Cherokee Coun	ty Fair Housing Survey		
Barriers to Fair I	Housing		
23. Do you thin	k housing discrimination is an issue in	Che	erokee County?
Yes, housing	discrimination is an issue		
Housing disc	rimination may be an issue		
No, housing o	discrimination is not an issue		
I don't know i	f housing discrimination is an issue		

24. D	o you think any of the following are barriers to fair housing in Cherokee County? (Check all that apply)
A	Admission and occupancy policies in public housing
c	Community opposition to affordable housing
D	Discrimination by landlords or rental agents
D	Discrimination by mortgage lenders
D	Discrimination or steering by real estate agents
D	Displacement of residents due to rising housing costs
L	ack of housing options for people with disabilities
L	andlords refusing to accept vouchers
	imited access to banking and financial services
	imited access to jobs
L	imited access to good schools
	imited access to community resources for people with disabilities
N	leighborhoods that need revitalization and new investment
N	Not enough affordable rental housing for large families
	Other (please list):
_	
	lease use the box below to provide any additional information about housing choice and fair housing terokee County.

Thank you for participating!

#### Encuesta de Vivienda Justa del Condado de Cherokee

#### ¡Contamos con tu Opinión!

El gobierno del Condado de Cherokee está trabajando en un estudio para evaluar la vivienda justa y la igualdad social en la comunidad. Dicho estudio, llamado Evaluación de Vivienda Justa, es un requisito del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD) para que el condado continúe recibiendo fondos del gobierno para vivienda y desarrollo de la comunidad. El estudio analizará si cada persona en el condado de Cherokee tiene opciones similares de vivienda independientemente de su raza, origen étnico, país de origen, sexo, religión, de que tenga hijos o no, o de alguna discapacidad. También permitirá diseñar un plan para hacer frente a los obstáculos en la elección de una vivienda justa.

Una parte importante de este estudio es escuchar a los miembros de la población sobre cuestiones relacionadas con vivienda justa y elección de vivienda. Esta encuesta es una forma de obtener su aporte.

Sus respuestas son tratadas de forma confidencial. Únicamente se reportará la información obtenida en esta encuesta, en combinación con las respuestas de otras encuestas y en forma resumida, para proteger su privacidad. Favor de no escribir su nombre u otra información personal en esta encuesta. Es posible detener la encuesta en cualquier momento sin perder los beneficios que de otro modo recibiría. Si tiene alguna pregunta, favor contactar a Mosaic Community Planning al 770-366-7893 o escribir a info@mosaiccommunityplanning.com.

Esta encuesta solo tomara 7-10 minutos para completar.

Encuesta de Vivienda Justa del Condado de Cherokee	
Información General	
1. Indique el barrio en el que reside.	

خ .2	Cuál grupo de edad le pertenece a usted?		
	Menos de 18		45-54
	18-24		55-61
	25-34	$\bigcirc$	62-74
	35-44		75+
خ .3	Cuál es su ingreso total del hogar?		
	Menos de \$10,000		\$35,000 - \$49,999
	\$10,000 - \$14,999		\$50,000 - \$74,999
	\$15,000 - \$24,999		\$75,000 - \$99,999
	\$25,000 - \$34,999	$\bigcirc$	\$100,000 o más
خ. 4	Cuál es su raza/etnia?		
	Blanca		Asiático o Isleños del Pacífico
	Afro Americano o Negro	$\bigcirc$	Indios Americano o Natural de Alaska
	Latino o Hispano	$\bigcirc$	Mas de una raza
	Otro (especificar):		
خ. 5 ص	Hay otro idioma que no sea inglés hablado regula	arme	nte en su hogar?
	No		
$\bigcirc$	Sí, ¿qué es el idioma?		
6. خ	Hay personas en su hogar con discapacidades es	spéc	ales?
	No		
	Sí		

	rienda?
Soy propietario	Soy desamparado
Yo renta una casa	Vivo con un familiar
Vivo en un hotel o motel	
Otro (especificar):	
8. ¿Reside actualmente en una vivienda	a pública o recibe ayuda de alquiler bajo el programa Sección 8?
No	
Sí	
ncuesta de Vivienda Justa del Conda	ado de Cherokee
erca de su Vecindario	
9. ¿Qué tan satisfecho esta con el vecir	
Muy satisfecho	No muy satisfecho
Muy satisfecho Un poco satisfecho	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho	No muy satisfecho Para nada satisfecho
Muy satisfecho	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario  11. ¿Qué mejorías le gustaría ver?	No muy satisfecho Para nada satisfecho
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario  11. ¿Qué mejorías le gustaría ver?	No muy satisfecho Para nada satisfecho  ?
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario  11. ¿Qué mejorías le gustaría ver?  12. ¿Hay alguna otra área en el condad	No muy satisfecho Para nada satisfecho  ?  do de Cherokee adonde le gustaría mudarse?
Muy satisfecho Un poco satisfecho  10. ¿Qué le gusta más de su vecindario  11. ¿Qué mejorías le gustaría ver?  12. ¿Hay alguna otra área en el condad  No	No muy satisfecho Para nada satisfecho  ?  do de Cherokee adonde le gustaría mudarse?

13.	;En	su vecindario.	tienen acceso	a los	siguientes	recursos	de l	a comunidad?
-----	-----	----------------	---------------	-------	------------	----------	------	--------------

	Sí	Algo	No	No sabes
Escuelas públicas de calidad				
Servicio de buses confiable				
Áreas con trabajos que usted podría obtener				
Lugares para comprar y hacer transacciones bancarias				
Vivienda que usted puede pagar				
Vivienda que está en buenas condiciones				
Parques y veredas				
Ambiente limpio				

Encuesta de Vivienda Justa del Condado de Cherokee

Acerca del Condado de Cherokee

de cada uno de los tipos de vivienda a continuación.						
	No se necesita más	Se necesita un poco más	Se necesita mucho más	No sabes		
Vivienda para personas con discapacidades		0		$\circ$		
Vivienda para adultos mayores						
Vivienda que personas con menores ingresos puedan costear		0				
Vivienda que admita vales del programa Sección 8						
Apartamentos						
Ayuda para los que están comprando vivienda por primera vez						
15. Pensando en toda usted piensa que estár		ivamente, y en buen e	stado, en todos los ve	•		
	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
usted piensa que estár	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
usted piensa que estár Escuelas	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
usted piensa que estár  Escuelas  Servicio de autobús	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
usted piensa que estár  Escuelas  Servicio de autobús  Carreteras y aceras  Supermercados y otros	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
Escuelas Servicio de autobús Carreteras y aceras Supermercados y otros lugares para compras Bancos e intituciones de	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
Escuelas Servicio de autobús Carreteras y aceras Supermercados y otros lugares para compras Bancos e intituciones de crédito	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
Escuelas Servicio de autobús Carreteras y aceras Supermercados y otros lugares para compras Bancos e intituciones de crédito Parques y veredas	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		
Escuelas Servicio de autobús Carreteras y aceras Supermercados y otros lugares para compras Bancos e intituciones de crédito Parques y veredas Recolección de basura Mantenimiento de	n disponibles equitat	ivamente, y en buen e	stado, en todos los ve	ecindarios.		

Encuesta de Vivienda Justa del Condado de Cherokee

14. Pensando en toda el condado de Cherokee, por favor seleccione si usted piensa que se necesita más

### Equidad de Vivienda

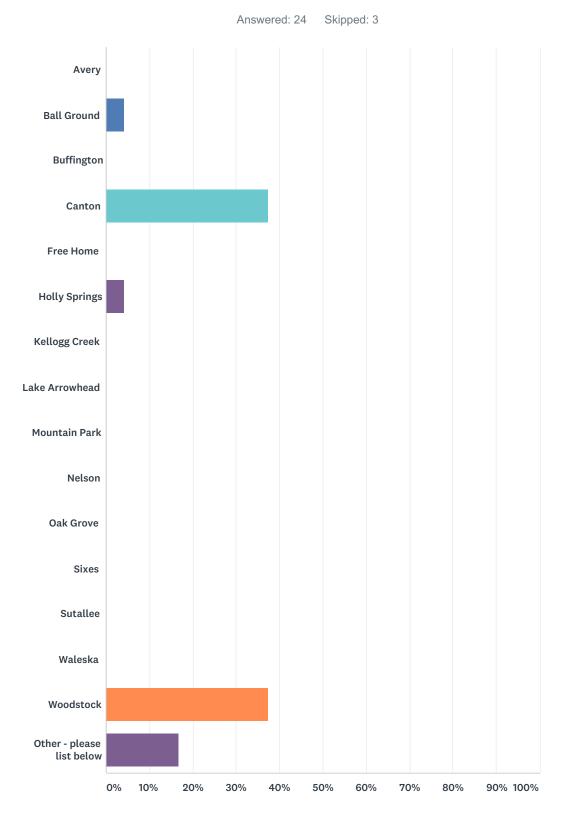
16. ¿Entiende sus derechos de equidad de vivienda?
○ Sí
○ Un poco
○ No
17. ¿Sabe usted dónde archivar una queja de discriminación de vivienda?
○ Sí
O Un poco
○ No
18. ¿Viviendo en el condado de Cherokee, has experimentado la discriminación de la vivienda?
Las siguientes acciones son ejemplos de discriminación en materia de vivienda si se basan en raza, origen étnico, país de origen, sexo, religión, de que tengan o no hijos, o alguna discapacidad: rehusar a alquilar o vender una vivienda, rehusar a negociar el alquiler o venta de la vivienda, negar que la vivienda está disponible para alquiler o venta cuando sí lo está, establecer diferentes términos o condiciones de alquiler o venta, o proveer vivienda o servicios de vivienda diferentes.
○ Sí
○ No
Encuesta de Vivienda Justa del Condado de Cherokee
Equidad de Vivienda
19. ¿Quién discriminó contra usted? (Seleccionar todo lo que corresponda)
El dueño/gerentede propiedad Un prestamista hipotecario
Un agente de bienes raíces Un miembro del personal de la ciudad / condado
Otro (especificar):

20. ¿En base a qué cree que discriminaron contra us	ted? (Seleccionar todo lo que corresponda)
Raza	Sexo
Etnia	Incapacidad o discapacidad
Nacionalidad	Situación familiar (Parientes Solteros, Familias con niños, Madres embarazadas)
Religión	Maures embarazadas)
21 - Procenté une denuncie ner discriminación?	
21. ¿Presentó una denuncia por discriminación?	
○ Sí	
No	
22. Si usted no presentó una denuncia discriminación	n, ¿por qué no lo hizo?
Yo no sabía lo bueno que iba a hacer	Tenía miedo a las represalias
No sabía dónde archivar	El proceso no fue en mi idioma
No tuve tiempo de llenarlo	El proceso no era accesible para mí debido a una
No me di cuenta que era una violación de la ley	discapacidad
Otro (especificar):	
Encuesta de Vivienda Justa del Condado de Cher	rokee
Obstáculos para Obtener Vivienda Justa	
23. ¿Cree usted que la discriminación en materia de Cherokee?	vivienda es un problema en el condado de
Sí, la discriminación en materia de vivienda es un problema	
Es posible que la discriminación en materia de vivienda sea	un problema
No, la discriminación en materia de vivienda no es un proble	ema
No sé si la discriminación en materia de vivienda es un prob	lema

24. ¿Crees que alguno de los siguientes son las barreras a la equidad de vivienda en el condado de Cherokee? (Seleccionar todo lo que corresponda)
Restricciones de admisión y alquiler en vivienda publica
Oposición a la vivienda asequible de parte de la comunidad
Discriminación por parte de los propietarios o agentes
Discriminación por parte de los prestamistas
Discriminación o dirección de parte de los agentes de bienes y raíces
Desplazamiento de residentes por los incrementos en costos de vivienda
Falta de opciones de vivienda para personas con discapacidades
Propietarios que rehúsan aceptar cupones
Acceso limitado a bancos y servicios financieros
Acceso limitado a empleadores
Acceso limitado a escuelas buenas
Acceso limitado a recursos de la comunidad para personas con discapacidades
Vecindarios que necesitan ser renovados y recibir nueva inversión
No hay suficientes viviendas asequibles en alquiler para familias grandes
Otro (especifique):
25. Por favor usar el espacio disponible abajo para proporcionar cualquier otra información adicional acerca de la elección de vivienda y vivienda justa en el condado de Cherokee.

¡Gracias por su tiempo!

### Q1 Please select the area where you live.



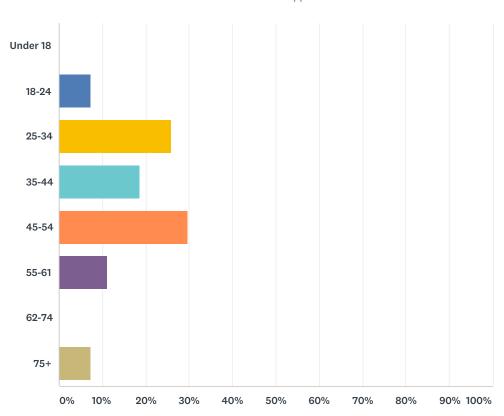
ANSWER CHOICES	RESPONSES	
Avery	0.00%	0

Ball Ground	4.17%	1
Buffington	0.00%	0
Canton	37.50%	9
Free Home	0.00%	0
Holly Springs	4.17%	1
Kellogg Creek	0.00%	0
Lake Arrowhead	0.00%	0
Mountain Park	0.00%	0
Nelson	0.00%	0
Oak Grove	0.00%	0
Sixes	0.00%	0
Sutallee	0.00%	0
Waleska	0.00%	0
Woodstock	37.50%	9
Other - please list below	16.67%	4
TOTAL		24

#	OTHER - PLEASE LIST BELOW	DATE
1	Cobb County	12/27/2017 8:43 PM
2	Marietta	12/27/2017 8:28 PM
3	Homeless	12/27/2017 12:23 PM
4	Macedonia	12/5/2017 4:40 PM

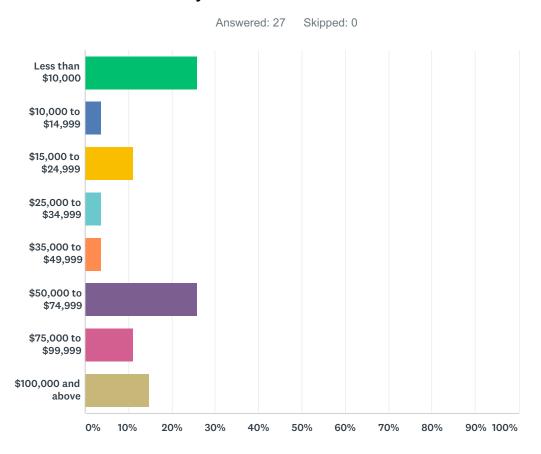
## Q2 Which is your age group?





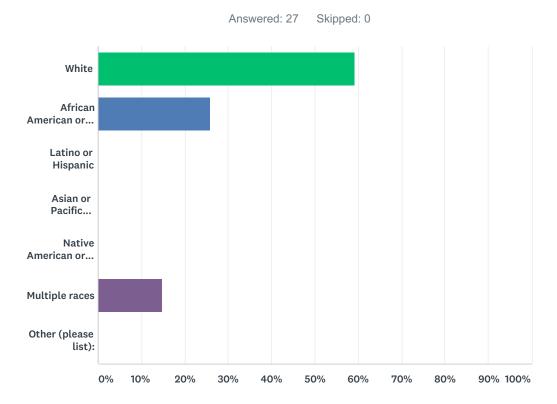
ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18-24	7.41%	2
25-34	25.93%	7
35-44	18.52%	5
45-54	29.63%	8
55-61	11.11%	3
62-74	0.00%	0
75+	7.41%	2
TOTAL		27

# Q3 What is your total household income?



ANSWER CHOICES	RESPONSES	
Less than \$10,000	25.93%	7
\$10,000 to \$14,999	3.70%	1
\$15,000 to \$24,999	11.11%	3
\$25,000 to \$34,999	3.70%	1
\$35,000 to \$49,999	3.70%	1
\$50,000 to \$74,999	25.93%	7
\$75,000 to \$99,999	11.11%	3
\$100,000 and above	14.81%	4
TOTAL		27

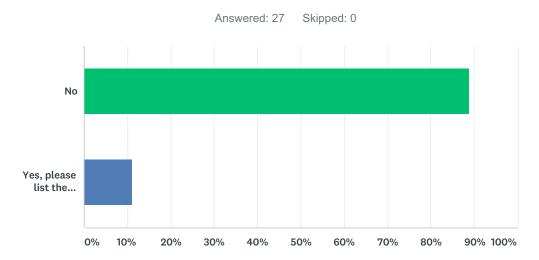
## Q4 What is your race/ethnicity?



ANSWER CHOICES	RESPONSES	
White	59.26%	16
African American or Black	25.93%	7
Latino or Hispanic	0.00%	0
Asian or Pacific Islander	0.00%	0
Native American or Alaska Native	0.00%	0
Multiple races	14.81%	4
Other (please list):	0.00%	0
TOTAL		27

#	OTHER (PLEASE LIST):	DATE
	There are no responses.	

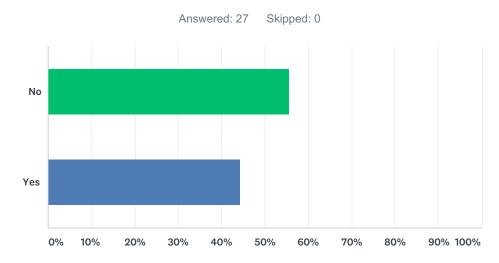
# Q5 Does anyone in your home regularly speak a language other than English?



ANSWER CHOICES	RESPONSES	
No	88.89%	24
Yes, please list the language:	11.11%	3
TOTAL		27

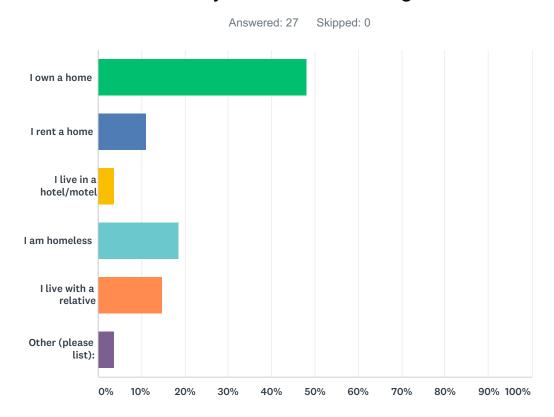
#	YES, PLEASE LIST THE LANGUAGE:	DATE
1	Spanish	12/27/2017 8:43 PM
2	German	12/5/2017 4:40 PM
3	Khmer	12/5/2017 2:47 PM

## Q6 Does anyone in your home have a disability?



ANSWER CHOICES	RESPONSES	
No	55.56%	15
Yes	44.44%	12
TOTAL		27

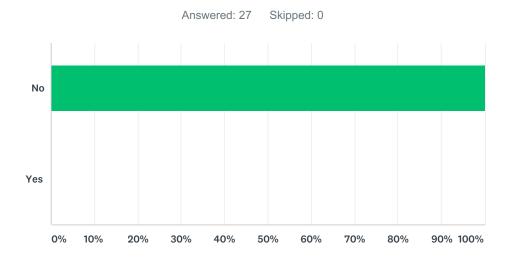
# Q7 What is your current housing status?



ANSWER CHOICES	RESPONSES	
I own a home	48.15%	13
I rent a home	11.11%	3
I live in a hotel/motel	3.70%	1
I am homeless	18.52%	5
I live with a relative	14.81%	4
Other (please list):	3.70%	1
TOTAL		27

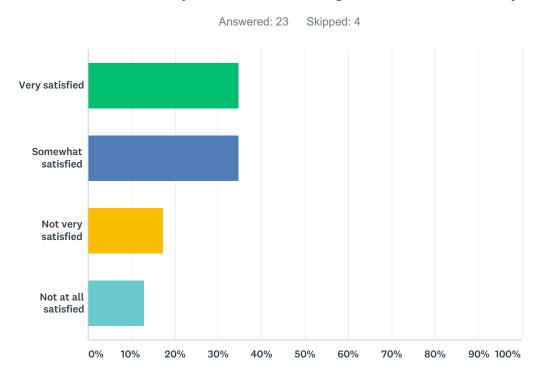
#	OTHER (PLEASE LIST):	DATE
1	Homeless and temporarily staying with a friend on their couch	12/27/2017 12:25 PM

# Q8 Do you currently live in public housing or receive Section 8 rental assistance?



ANSWER CHOICES	RESPONSES	
No	100.00%	27
Yes	0.00%	0
TOTAL		27

## Q9 How satisfied are you with the neighborhood where you live?



ANSWER CHOICES	RESPONSES	
Very satisfied	34.78%	8
Somewhat satisfied	34.78%	8
Not very satisfied	17.39%	4
Not at all satisfied	13.04%	3
TOTAL		23

## Q10 What do you like best about your neighborhood?

Answered: 21 Skipped: 6

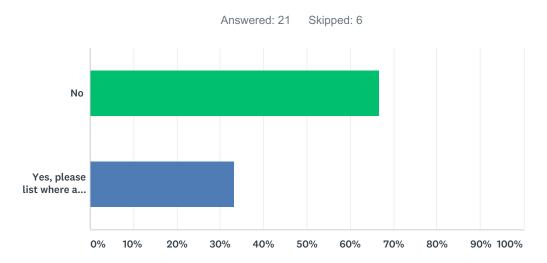
#	RESPONSES	DATE
1	It is very peaceful.	1/28/2018 10:37 PM
2	Located close to Walmart	1/2/2018 11:10 AM
3	Quiet	12/27/2017 9:12 PM
4	Very quiet and friendly environment with my mother	12/27/2017 9:04 PM
5	Convenience	12/27/2017 8:44 PM
6	I am currently homeless	12/27/2017 5:49 PM
7	Close to town and doctor's office	12/27/2017 12:26 PM
8	It is a peaceful neighborhood	12/18/2017 11:34 PM
9	Not much	12/13/2017 8:47 PM
10	It's nice but I couldn't afford it on my own.	12/10/2017 8:16 AM
11	It's nice, and everyone takes good care of their property.	12/6/2017 6:11 PM
12	I love that the area is changing and growing. The economic growth is exciting.	12/6/2017 6:06 PM
13	Community engagement, proximity to shopping/restaurants, proximity to city amenities like parks and trails.	12/6/2017 2:57 PM
14	It's a new development and very nice, neighbors are friendly, good access to 92 and highways.	12/6/2017 9:32 AM
15	Our neighborhood still has houses on .5-1 acre lots which are no longer available new.	12/6/2017 9:02 AM
16	Proximity to city park	12/6/2017 8:26 AM
17	Location to downtown woodstock	12/5/2017 10:30 PM
18	Community feel, small.	12/5/2017 9:34 PM
19	I like the area I am in. We left Alpharetta to be somewhere more rural.	12/5/2017 4:42 PM
20	My home	12/5/2017 2:50 PM
21	Community communication and involvement	12/5/2017 2:04 PM

## Q11 What improvements would you like to see?

Answered: 20 Skipped: 7

ш	DESIGNATE	DATE
#	RESPONSES	DATE
1	None	1/28/2018 10:37 PM
2	Clean up dog poop. A playground for the kids.	1/2/2018 11:10 AM
3	More street lights	12/27/2017 9:12 PM
4	Really nothing in the neighborhood where I'm at now just ready to be back in my own as a new parent with daughter	12/27/2017 9:04 PM
5	Just need stable housing	12/27/2017 8:44 PM
6	N/A	12/27/2017 5:49 PM
7	I have seen a rapid increase in the rate of violent armed crime and burglaries. I would like for everyone to have EARNED where they live instead of just assuming everyone must be equal. I don't see many homeless people around on the streets -so I don't see an issue with "fair housing". I will tell you that where "fair housing" has been appliedit results in an increase in crime and violence. We already have an overcrowded school system do you really want to turn Cherokee county into the next Atlanta? Further housing development should be completely turned down. What does affordable housing mean? Does it mean someone who got knocked up at 15 and now has 3 kids and is on welfare should be able to get a free 3 bedroom apartment on my hard working dime??????	12/18/2017 11:34 PM
8	Cherokee County to stop being a bought out government!!!!	12/13/2017 8:47 PM
9	More affordable housing	12/10/2017 8:16 AM
10	I'd like to see the developers' grip on our subdivision broken, and that we be able to have a proper homeowners association.	12/6/2017 6:11 PM
11	I think that we are definitely going to need to improve traffic patterns as we grow.	12/6/2017 6:06 PM
12	Additional trail connectivity and sidewalk expansion along busy roads.	12/6/2017 2:57 PM
13	nothing	12/6/2017 9:32 AM
14	More streetlights, buried utility wires in our neighborhood. In the county in general, crime has been steadily increasing	12/6/2017 9:02 AM
15	Speed humps to deter speeding	12/6/2017 8:26 AM
16	Too much traffic in the area. Reduce the amount of high density housing	12/5/2017 10:30 PM
17	Sidewalks, trails, widening of Kellogg Creek near Patriots Park.	12/5/2017 9:34 PM
18	None. I am happy the way it is.	12/5/2017 4:42 PM
19	Storm water management. The city just pushs all the storm water into our neighborhood and they states there is no problem. The schools don't allow minorities to enroll.	12/5/2017 2:50 PM

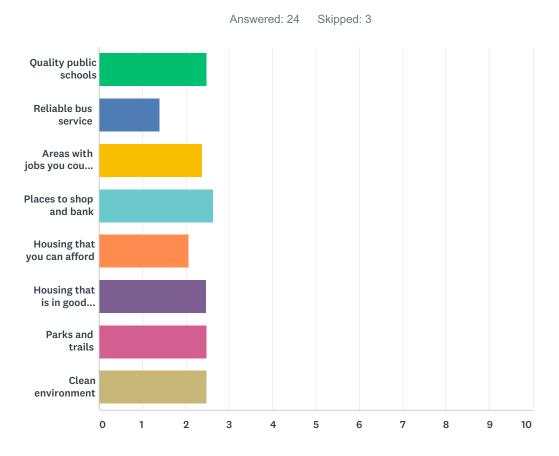
# Q12 Is there another area in Cherokee County where you would like to move?



ANSWER CHOICES	RESPONSES	RESPONSES		
No	66.67%	4		
Yes, please list where and why you would choose that area:	33.33% 7	7		
TOTAL	2′	1		

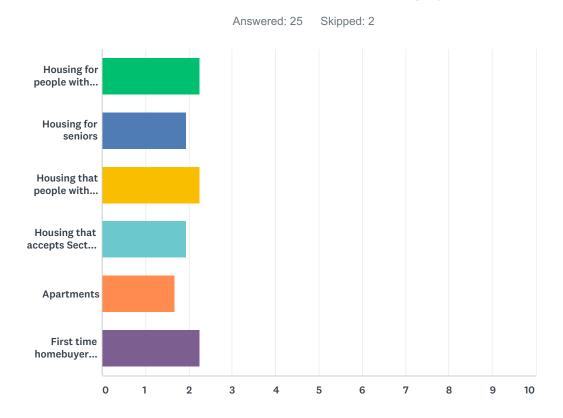
#	YES, PLEASE LIST WHERE AND WHY YOU WOULD CHOOSE THAT AREA:	DATE
1	Woodstock, to be in walking distance to activities	1/2/2018 11:10 AM
2	Woodstock	12/27/2017 12:28 PM
3	If Cherokee county is going to become the next crime ridden Atlantathen yes, I'll move out of here.	12/18/2017 11:34 PM
4	Towne Lake	12/13/2017 8:47 PM
5	I live with relatives.I used to live in an apartment I could afford. But they doubled rent to cater to higher income people wanting to move to the area.	12/10/2017 8:16 AM
6	Ball Ground for its potential for growth	12/6/2017 8:26 AM
7	A neighborhood that properly controls storm water and allows allow children to enroll in public schools	12/5/2017 2:50 PM

# Q13 In your neighborhood, do you have access to the following community resources?



	YES	SOMEWHAT	NO	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Quality public schools	62.50%	16.67%	16.67%	4.17%		
	15	4	4	1	24	2.48
Reliable bus service	12.50%	12.50%	66.67%	8.33%		
	3	3	16	2	24	1.41
Areas with jobs you could get	54.17%	29.17%	16.67%	0.00%		
	13	7	4	0	24	2.38
Places to shop and bank	75.00%	12.50%	12.50%	0.00%		
	18	3	3	0	24	2.63
Housing that you can afford	45.83%	16.67%	37.50%	0.00%		
	11	4	9	0	24	2.08
Housing that is in good condition	62.50%	20.83%	16.67%	0.00%		
	15	5	4	0	24	2.46
Parks and trails	62.50%	25.00%	12.50%	0.00%		
	15	6	3	0	24	2.50
Clean environment	65.22%	17.39%	17.39%	0.00%		
	15	4	4	0	23	2.48

# Q14 Thinking about Cherokee County, please check whether you think more is needed for each of the housing types below.

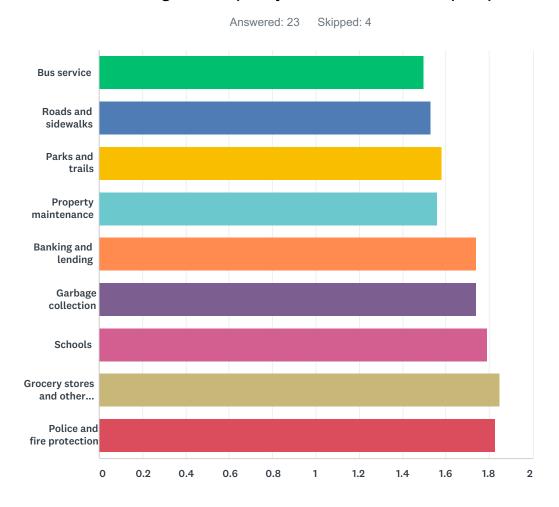


	NO MORE IS NEEDED	SOME MORE IS NEEDED	A LOT MORE IS NEEDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Housing for people with disabilities	20.00%	16.00%	40.00%	24.00%		
	5	4	10	6	25	2.26
Housing for seniors	36.00%	16.00%	32.00%	16.00%		
	9	4	8	4	25	1.95
Housing that people with lower	28.00%	16.00%	52.00%	4.00%		
incomes can afford	7	4	13	1	25	2.25
Housing that accepts Section 8	37.50%	20.83%	33.33%	8.33%		
vouchers	9	5	8	2	24	1.95
Apartments	50.00%	16.67%	20.83%	12.50%		
	12	4	5	3	24	1.67
First time homebuyer assistance	20.83%	20.83%	41.67%	16.67%		
	5	5	10	4	24	2.25

#	PLEASE SHARE ANY OTHER COMMENTS ABOUT LOCAL HOUSING NEEDS:	DATE
1	Can not afford apartment, the rent is so high. Low income housing is dilapidated and unclean. Unsafe environment.	1/2/2018 11:11 AM
2	Just fair and equal opportunity for all	12/27/2017 9:04 PM
3	The need for this is extremely important. Families are going homeless because they can't afford traditional housing.	12/27/2017 12:29 PM

4	We already have overcrowded streets, overcrowded schools - so it logically doesn't make sense to keep developing when we are big enoughunless you want to turn Cherokee County into the next cesspool.	12/18/2017 11:36 PM
5	Cherokee County is not fair housing friendly and offers ZERO assistance to its citizens!!!	12/13/2017 8:49 PM
6	Ask the affordable housing has disappeared in favor of building half million dollar homes & catering to renters that can pay \$1000 a month for a tiny buff infested apartment. All the rent subsidized apartments are gone.	12/10/2017 8:19 AM
7	No more apartments and no Section 8, period.	12/6/2017 6:13 PM
8	We don't have adequate emergency housing for our seniors, vets, and families in crisis.	12/6/2017 6:07 PM
9	More section 8 housing will only increase crime and run-down unsightly areas like all those trailer parks on Old Hwy 5. This drops property values and	12/6/2017 9:09 AM
10	Fewer high density housing developments, like apartments and townhomes.	12/5/2017 10:31 PM

# Q15 Thinking about Cherokee County, please check whether you think each of the following are equally available and kept up in all areas.

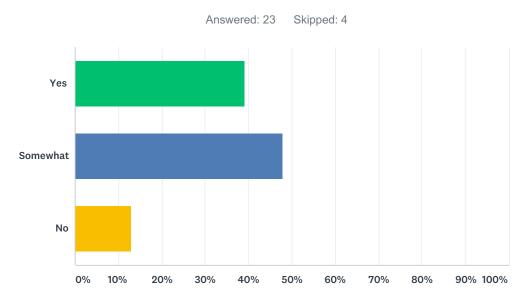


	EQUALLY PROVIDED	NOT EQUALLY PROVIDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Bus service	39.13% 9	39.13% 9	21.74% 5	23	1.50
Roads and sidewalks	45.45% 10	40.91% 9	13.64% 3	22	1.53
Parks and trails	50.00% 11	36.36% 8	13.64% 3	22	1.58
Property maintenance	45.45% 10	36.36% 8	18.18% 4	22	1.56
Banking and lending	63.64% 14	22.73% 5	13.64% 3	22	1.74
Garbage collection	63.64% 14	22.73% 5	13.64% 3	22	1.74
Schools	65.22% 15	17.39% 4	17.39% 4	23	1.79
Grocery stores and other shopping	73.91% 17	13.04% 3	13.04% 3	23	1.85

#### Cherokee County Fair Housing Survey

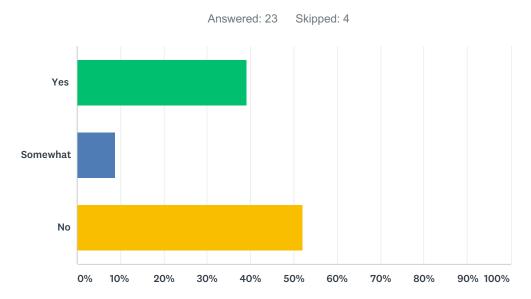
Police and fire protection	71.43%	14.29%	14.29%		
	15	3	3	21	1.83

### Q16 Do you understand your fair housing rights?



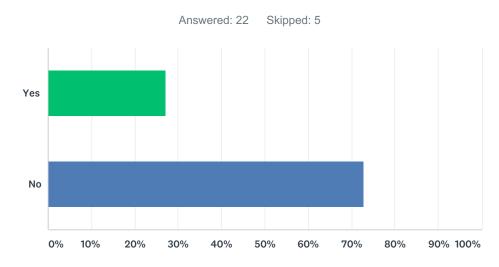
ANSWER CHOICES	RESPONSES	
Yes	39.13%	9
Somewhat	47.83%	11
No	13.04%	3
TOTAL		23

#### Q17 Do you know where to file a housing discrimination complaint?



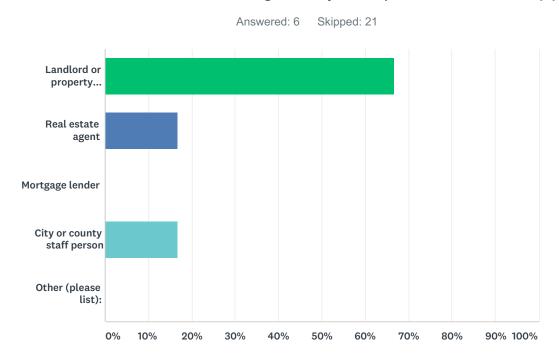
ANSWER CHOICES	RESPONSES	
Yes	39.13%	9
Somewhat	8.70%	2
No	52.17%	12
TOTAL		23

Q18 Since living in Cherokee County, have you experienced housing discrimination? The following actions are examples of housing discrimination if they are based on race, ethnicity, national origin, sex, religion, whether you have children, or whether you have a disability: refusing to rent or sell housing, refusing to discuss the rental or sale of housing, saying that housing is not available for rent or sale when it is, having different rental or sale terms, or providing different housing or housing services.



ANSWER CHOICES	RESPONSES	
Yes	27.27%	6
No	72.73%	16
TOTAL		22

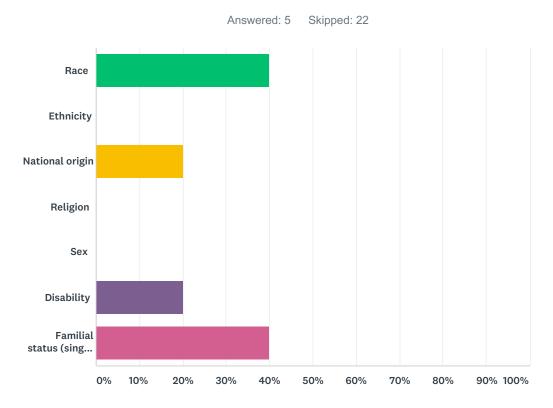
#### Q19 Who discriminated against you? (Check all that apply)



ANSWER CHOICES	RESPONSES	
Landlord or property manager	66.67%	4
Real estate agent	16.67%	1
Mortgage lender	0.00%	0
City or county staff person	16.67%	1
Other (please list):	0.00%	0
Total Respondents: 6		

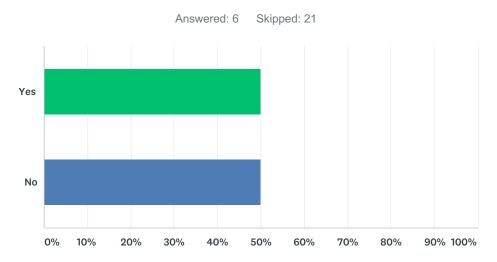
#	OTHER (PLEASE LIST):	DATE
	There are no responses.	

# Q20 On what basis do you believe you were discriminated against? (Check all that apply)



ANSWER CHOICES	RESPONSES	
Race	40.00%	2
Ethnicity	0.00%	0
National origin	20.00%	1
Religion	0.00%	0
Sex	0.00%	0
Disability	20.00%	1
Familial status (single parent with children, family with children, expecting a child)	40.00%	2
Total Respondents: 5		

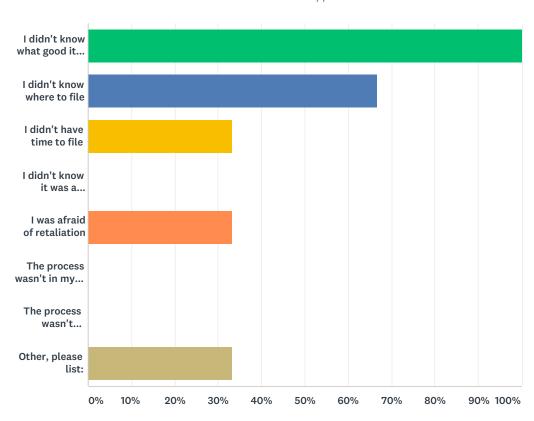
### Q21 Did you file a report of that discrimination?



ANSWER CHOICES	RESPONSES	
Yes	50.00%	3
No	50.00%	3
TOTAL		6

#### Q22 If you answered NO, why didn't you file?

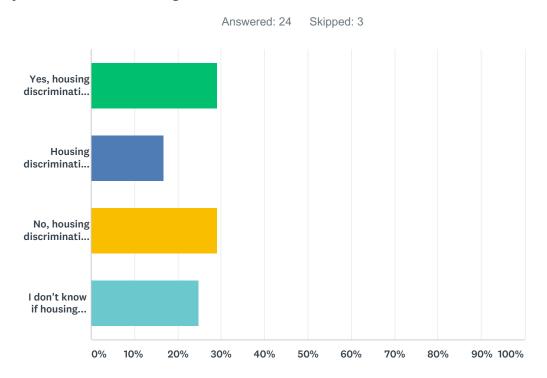




ANSWER CHOICES	RESPONSES
I didn't know what good it would do	100.00% 3
I didn't know where to file	66.67% 2
I didn't have time to file	33.33% 1
I didn't know it was a violation of the law	0.00% 0
I was afraid of retaliation	33.33% 1
The process wasn't in my language	0.00% 0
The process wasn't accessible to me because of a disability	0.00% 0
Other, please list:	33.33% 1
Total Respondents: 3	

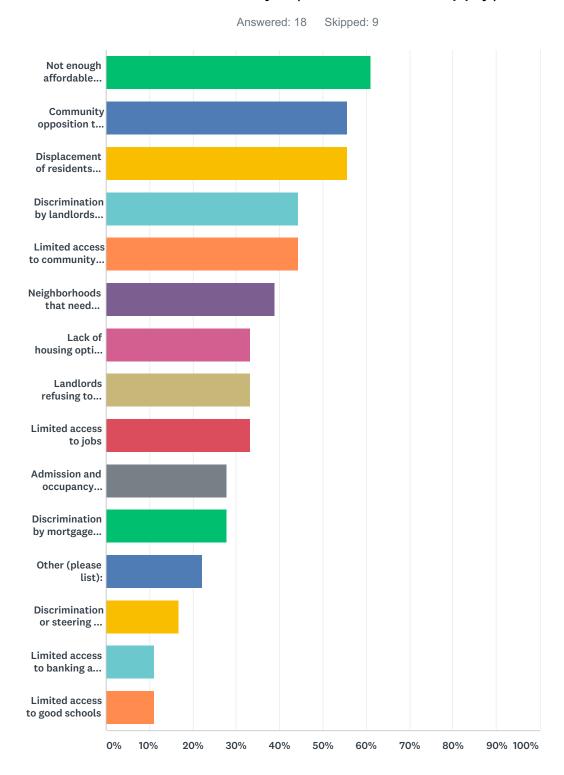
#	OTHER, PLEASE LIST:	DATE
1	Every employee at Cherokee County is white / Good ol' boys network	1/2/2018 11:12 AM

#### Q23 Do you think housing discrimination is an issue in Cherokee County?



ANSWER CHOICES	RESPONSES	
Yes, housing discrimination is an issue	29.17%	7
Housing discrimination may be an issue	16.67%	4
No, housing discrimination is not an issue	29.17%	7
I don't know if housing discrimination is an issue	25.00%	6
TOTAL		24

## Q24 Do you think any of the following are barriers to fair housing in Cherokee County? (Check all that apply)



ANSWER CHOICES	RESPONSES	
Not enough affordable rental housing for large families	61.11%	11
Community opposition to affordable housing	55.56%	10

#### Cherokee County Fair Housing Survey

Displacement of residents due to rising housing costs	55.56%	10
Discrimination by landlords or rental agents	44.44%	8
Limited access to community resources for people with disabilities	44.44%	8
Neighborhoods that need revitalization and new investment	38.89%	7
Lack of housing options for people with disabilities	33.33%	6
Landlords refusing to accept vouchers	33.33%	6
Limited access to jobs	33.33%	6
Admission and occupancy policies in public housing	27.78%	5
Discrimination by mortgage lenders	27.78%	5
Other (please list):	22.22%	4
Discrimination or steering by real estate agents	16.67%	3
Limited access to banking and financial services	11.11%	2
Limited access to good schools	11.11%	2
Total Respondents: 18		

#	OTHER (PLEASE LIST):	DATE
1	When I see homeless families on the street - then I will know there are barriers. There's not a plethora of homeless families on the street - other than nomadic transients and some druggies. All the illegals have a place to go all of the women and chidren have a place to go. If we had a fair housing issue - there would be far more homeless people here.	12/18/2017 11:40 PM
2	Transition housing for families.	12/6/2017 6:09 PM
3	The perceived notion that any of this exists. Housing needs exist by market/job demands, not perceived ethnic discrimination. Don't fall into that trap just because you want federal money.	12/6/2017 9:12 AM
4	No public transportation.	12/5/2017 2:06 PM

# Q25 Please use the box below to provide any additional information about housing choice and fair housing in Cherokee County.

Answered: 9 Skipped: 18

#	RESPONSES	DATE
1	Need more housing for low income. When you only get \$675.00 a month there isn't any place to rent. I have hunted and had to move in with my son. I have bills to pay besides rent.	1/28/2018 10:39 PM
2	We are both disabled in my household on a fixed income. My spouse is a veteran. We have tried to find housing we can afford and buy medication. There is overt discrimination. Apartments that are decent are not affordable. There is not HUD housing to speak about. I have been trying to get a Section 8 voucher for 8+ years. There is not enough help for low-income single parents or seniors. We need help qualifying for housing.	1/2/2018 11:15 AM
3	I don't think I never stayed under housing authority so I don't know how to answer question 24. Sorry just being honest.	12/27/2017 9:05 PM
4	There needs to be more housing available for disable/handicapped people and senior citizens.	12/27/2017 12:30 PM
5	Again, what does "housing choice" and "fair housing" mean? Does that mean that I work my butt off and pay my mortgagewhile some other person made poor choices, and gets a free ride that I pay for with my taxes? When I first started out I lived in apartments and had roommates. I couldn't even afford a car. I had to make the right choices and work hard to be able to afford a house. That's the way it should be. And if an adult does not want to make the right choices, then that adult should suffer the consequences.	12/18/2017 11:40 PM
6	Cherokee County HATES poor, disabled and anything but white people with lots of money!!	12/13/2017 8:50 PM
7	I lived in a low income rent subsidized apartment. Paying \$760 for 2 bedroom. In 3 years my rent doubled. They said they no longer did the low income subsidy. They were pushing out low income renters in favor of people who would pay more. I spoke anonymously with a manager who was excited about all the people moving north, & they would cater to them. We couldn't find a single place available in Cherokee county to rent. I had a baby on the way & had to move in with relatives.	12/10/2017 8:28 AM
8	Go away and take this ridiculous Obama-era initiative with you. Cherokee County is still fairly nice, in most places, and the last thing we need are more criminals, illegals and Section 8 scum.	12/6/2017 6:15 PM
9	As I'm sure you know, you're developing the heck out of this county and I hope you are taking infrastructure needs to heart as well as needs for more schools. Don't wait until things become at a critical mass before doing something about it (i.e. roads).	12/6/2017 9:12 AM