



Cherokee County Board of Commissioners
Purchasing Department
1130 Bluffs Parkway, Canton, GA 30114
Phone: (678) 493-6000
Fax: (678) 493-6035

REQUEST FOR PROPOSALS

RFP# 2023-038 Fair Housing Plan Update and Preparation of a Five-Year Consolidated Plan & FY24 Annual Action Plan

THE PROJECT: The Cherokee County Board of Commissioners Purchasing Department (County) is requesting competitive sealed **proposals** in support for the update of the Analysis of Impediments to Fair Housing Choice (AI) and the development of the Five-Year Consolidated Plan (2024 – 2028) and Fiscal Year 2024 Annual Action Plan (AAP) - as described herein

There **will not** be a mandatory meeting to review the requirements.

All times in the solicitation are local times to Cherokee County, Georgia in the Eastern Time Zone.

This Request for Opportunity Description is one of two documents making up this solicitation. The second document is Cherokee County Standard Solicitation Terms and Conditions, which contains all the standard forms potentially required to accompany a submission. Both of these documents together constitute the entire solicitation at the time of issuance.

The County reserves the right to reject any or all bids/proposals, to waive technicalities and to make a selection and final award as deemed to be in the best interest of the County, including using any form of contract it deems most advantageous to the County.

SCHEDULE:

Issued	July 12, 2023
Questions Due*	July 19, 2023 by 4:00 PM
Answers Due	July 26, 2023
Bids/Proposals Due*	August 9, 2023 at 10:00 AM
Anticipated Award Date	September 5, 2023

THE EXPECTED PERIOD OF PERFORMANCE:

The base period of performance is broken down into two areas; Physical Delivery of Product(s) and Service Delivery. This is a function of the Statement of Work (SOW) and/or specification and reflects if there is physical item or items to be delivered and / or delivery of services. An X in the box corresponding to item 1 below, Physical Delivery indicates a physical item or items are to be delivered and an X in the 2. Delivery of Services indicates that Services are to be performed. Either or both may apply to the work contemplated by this solicitation.

Additionally, should there be an X in the box corresponding item 3. Option Grant, then the County requests the right to extend the period of performance beyond the Base Rate as specified.

1. ☒ NO PHYSICAL ITEMS/GOODS ☐ PHYSICAL DELIVERY OF ITEMS/GOODS REQUIRED:

For Physical Delivery solicitations, the period of performance for an award shall begin with either the placement of Purchase Order or the date indicated on the Agreement. All items to be delivered are to be FOB Cherokee County at the address indicated in the solicitation. Performance shall be complete upon final acceptance by the County. Time is of the essence for the delivery of each item specified. Warranty requested as below:

☐ Warranty Term Requested: _____

2. ☐ No SERVICES REQUIRED ☒ PERFORMANCE OF SERVICES:

For Performance of Services solicitations, the period of performance shall begin with the placement of either a Purchase Order or the date of the Agreement unless the Agreement, the SOW or the Solicitation Terms indicate that performance shall begin upon the issuance of a Notice to Proceed (NTP), in which case the NTP would represent the beginning of performance. Term of services requested are as below:

Services Term:

- ☐ One Year
☐ Two Years
☐ Three Years
☒ Other: One year with the option to extend up to one additional year.

3. ☒ OPTION GRANT:

This solicitation contains requested options; please see Statement of Work for details.

SUBMITTAL INSTRUCTIONS:

Interested Bidders/Proposers must carefully review the requirements defined herein and provide complete and accurate submissions that must include the following items (**only items indicated with an “X” in the corresponding boxes are required for this solicitation**):

- ☒ Information and Addenda Acknowledgement Form (Appendix A)
- ☒ Non-Influence and Non-Collusion Affidavit (Appendix B)
- ☒ E-Verify Affidavit (Appendix C)
- ☒ References* (Appendix D)
- ☒ Acceptance of County' Standard Agreement**, as below: (Appendix E)
- ☒ Professional Services Agreement (Sample provided)

- ☒ Suspension, Debarment and Litigation Affidavit (Appendix F)
- ☒ SAM registration is required (Appendix F)
- ☐ Contractor's License Certification (Appendix G)
- ☐ Bonds Requirements **if the price bid > \$100K**
 - ☐ Ability to Provide Performance, Labor & Matl. Payment Bond (Appendix H)
 - ☐ Bid Bond (See Appendix I)
- ☒ Evidence of/ability to provide Insurance at the limits identified herein,***
- ☒ Certifications, Licenses or Registrations as required by law and/or as requested
- ☐ Pricing on Proposer's Company Letterhead
- ☐ Pricing on included pricing sheet / bid form
- ☒ Contractor's Qualifications Statement (Appendix J)
- ☒ Federal Required Appendices (End of this RFP)
- ☒ Any other requirements as requested under the scope of work

Notes:

*The County reserves the right to contact not only those references provided, but may also use previous performance for the County, other contacts it identifies and other sources of information believed to be viable to evaluate capability, viability and performance.

**If Acceptance of County's Standard Agreement is checked, all work/items defined herein are to be quoted according to these requirements. Copies of these agreements can be located at the County's Procurement web page.

***Insurance levels requested are those identified in the County's Standard Agreement, section "I."

****Standard Solicitation Terms Refer to Cherokee County Standard Solicitation Terms and Conditions

EVALUATION CRITERIA:

Bids/Proposals that contain options or additive work above and beyond the base bid will be evaluated financially according to the criteria described in the solicitation. However, should the use of options or additive work proposed exceed the County budget, the County retains its rights to address such situations as described in its Standard Terms For Bid and Proposal Solicitation as well as the right to award based on the base bid only or the base bid plus quoted additive work that is within its budget.

Proposals determined to be Responsive and Responsible will be evaluated on the following criteria:

40%	Price
30%	Technical Merits
30%	Qualifications
100%	TOTAL

References may be contacted should the evaluation team deem them necessary.

Proposals will be scored on the above evaluation criteria. Failure to provide information necessary to evaluate proposal, may result in a lower scoring proposal.

The County reserves the right to reject the bid of any vendor who has previously failed to perform properly or complete on time contracts of a similar nature, or who upon investigation shows is not in a position to perform the contract.

HOW AND WHERE TO SUBMIT BIDS AND PROPOSALS:

The County has two methods for receiving bids and proposals that are mutually exclusive; either electronically or by physical receipt. The box with the "X" below indicates how and where bids or proposals are to be submitted. The County will NOT accept proposals by fax, or e-mail unless authorized, in writing, by the Procurement Director. The solicitation submission deadline will be strictly enforced; no late bids/proposals will be accepted for any reason, please plan accordingly.

A. Electronic Submissions Only:

Proposals are to be submitted electronically **ONLY** to BidNet Direct. Physical copies are not to be submitted unless approved in advance by the Purchasing Director.

Proposals and all requested documentation to be provided electronically should in the Adobe Portable Document Format (PDF) as ONE file unless otherwise indicated in these solicitation instructions. Documents provided in response to this solicitation are to be named according to the following naming convention:

- a. [Solicitation Number]_[Vendor Name]_[Document Type]
Example: "2017-111_ABC Company_Proposal"

QUESTIONS/ADDENDA:

Only written inquiries will be permitted during the solicitation period. **Questions are to be submitted via BidNet Direct** for this solicitation no later than the date and time indicated in the Schedule, as may be amended. Answers will be posted via formal Addendum and only released as part of the solicitation documents on BidNet Direct. All interested parties are instructed to monitor BidNet Direct on a regular basis throughout the solicitation period. The final date for posting of Addenda is per the Schedule, as may be amended.

STATEMENT OF WORK AND / OR SPECIFICATION LOCATED ON THE NEXT PAGE

STATEMENT OF WORK AND / OR SPECIFICATION:

General Description: Cherokee County, Georgia is located 30 miles north of Atlanta in Northwest Georgia with a population of 266,620 (decennial Census, 2020) and an estimated population of 279,435 (2022 Cherokee County, GA ACFR). The County is requesting sealed proposals from qualified firms and consultants referred to as CONSULTANT, to provide professional services for the update to the Analysis of Impediments to Fair Housing for fair housing planning and the provision of professional services to develop the Cherokee County, GA Five-Year Consolidated Plan (2024 – 2028, ConPlan) and First Year Annual Action Plan (2024). The Consultant should have expertise in fair housing and other equal housing opportunity programs or concerns and experience with the United States Department of Housing and Urban Development's Community Planning and Development programs. In addition, the Consultant must have expertise in the preparation of the Consolidated Plan and first-year annual action plan for entitlements.

Detailed Description:

Cherokee County, GA receives CDBG and HOME funds directly from HUD, and as a condition of receiving federal funds, is required to affirmatively further fair housing thereby taking proactive steps to eliminate three acts: the act of discrimination, the act of segregation, and the act of apparent barriers in housing choice. And, by doing so, creates integrated and balanced living patterns. The County promotes fair housing and aims to educate providers of housing the impact the three acts have on the disadvantaged and its most vulnerable citizens. Secondly, the County is to create an environment where individuals of similar income levels in the same housing market area have available to them a like range of choices in housing regardless of race, color, religion, sex, national origin, disability, or familial status.

In April 2018, the Cherokee County Board of Commissioners approved an Analysis of Impediments to Fair Housing Choice (AI), provided in this solicitation as an independent document and referred as AI throughout this SOW. It is understood that findings from the analysis could carry over and remain as impediments and barriers. In June 2021, HUD published an Interim Final Rule (IFR) to restore meaningful implementation of the Fair Housing Act's AFFH requirement. Although the IFR does not restore HUD's procedural provisions that governed how HUD grantees conducted fair housing planning, Cherokee County wishes to have the most up-to-date housing assessment to inform the Five-Year Consolidated Plan (ConPlan) with an update to its AI.

In June 2019, the Cherokee County Board of Commissioners approved the Consolidated Plan (2019-2023) submission to HUD. Using the results of the update to the AI, incorporate meaningful goals and strategies into the development of the ConPlan and first year annual action plan to address fair housing issues identified in the AI update. The winning bidder will coordinate with the Community Development Block Grant (CDBG) Program Office staff (CDBGPO) as necessary.

Qualification Submission Requirements:**Submission Requirement**

Minimum Qualifications: Interested firms and consultants that can demonstrate the ability to successfully complete the task outlined under the Scope of Work are invited to submit a proposal and pricing. Interested bidders must meet the following requirements to receive consideration:

Submission Requirement

1. Must have a minimum of five (5) years of recent experience providing fair housing consulting services and the development of Five-Year Consolidated Plans and first-year annual action plans, or services equivalent or similar to the services identified in the Scope of Work and conducted HUD-approved Analysis of Impediments, AFFH Plans, Section 504 Plan, or Consolidated Plan and first-year annual action plan and/or prosecuted, litigated, or defended a fair housing violation. Include in the submission the number of AI's, Section 504 Plans, Consolidated Plans, First Year Annual Action Plans, and AFFH Plans as appropriate, in firm/company achievements, or prosecutions/litigations, or defenses of fair housing violations, as appropriate.

Submission Requirement

2. Must have a Planning/Project Manager assigned to the contract with five (5) years recent experience providing Fair Housing consulting services, Consolidated Plan and First-Year Annual Action Plan consulting services for the preparation of the ConPlan and Annual Action Plan, intake, investigations, data collection, and interpretation of Federal laws. Consultants must submit a summary of achievements or work demonstrating a proven track record of on-time submissions, well-received submissions, and accurate submissions.

Submission Requirement

3. Must comply with the RFP format and requirements set forth in the Solicitation Documentation.

Submission Requirement

4. Must provide a minimum of three (3) organizational references from persons cognizant of the process and outcomes that can be contacted to verify background, work performance, project completion, timeliness, analytical thinking skills, and the content accuracy of the final report and support in presenting the findings to governing bodies.

Submission Requirement

5. It is expected that the Consultant will have a kickoff meeting with the CDBGPO and a minimum of one interim meeting and a wrap-up meeting. The proposal must include the three (3) trips, including optional pricing.

Submission Requirement

Scope of Work (AI Update):

The Consultant will provide services for the update to the Analysis of Impediments for Fair Housing and use that update to assist in the preparation of the Five-Year Consolidated Plan (2024 – 2028) and first year annual action plan (2024). The update to the AI for the period January 1, 2024 through December 31, 2028, shall be completed prior to the preparation of the Consolidated Plan and submitted to the County for Board Approval with enough lead time to prepare the Consolidated Plan and first-year annual action plan which must be approved by the Cherokee County Board of Commissioners no later than **May 21, 2024. The first draft must be submitted to the Cherokee County CDBG Program Office within 60 days of contract execution and a final draft must be submitted for review prior to finalizing the Plan.**

HUD requires the County to certify that it is affirmatively furthering fair housing. It is expected that the County will implement the update to the 2018 AI that will serve as an effective planning tool by offering priorities, quantifiable goals, and solutions that should, if implemented, expand access to important community assets and resources that have an impact on the quality of life for residents. HUD regulations and the Fair Housing Act's AFFH requirements specify the use of HUD-provided data located at <https://egis.hud.gov/affht/>. However, HUD data must be supplemented by local data which includes demographic or program related data and documents maintained by the County and other local jurisdictions. Data from all, including other entities, that is readily available and accessible to program participants as well as local knowledge obtained through community participation process, must be included.

Submission Requirement

The Consultant must provide, on company letterhead, a detailed description of what service it will render, methodology used to meet the requirements set forth, and how the services will be performed leading to the development of the update to the 2018 Analysis of Impediments to Fair Housing (i.e. explain how the Consultant plans to become familiar with the goals and strategies identified in the current plans and documents).

Submission Requirement

The proposal must provide a detailed discussion of the Consultant's experience including the resumes for the project's team and team member assignments to tasks as identified under this section. The proposal shall also include the resources available to the Consultant to accomplish the tasks set forth in the project, including, but not limited to the analysis of data provided by HUD (maps, graphs, charts, tables, and other graphic representations).

Submission Requirements

Specifically, the scope of the work for the update to the 2018 AI will result in a fair housing planning document including performance measures, and as such, the proposal must detail "The Work" and must include the following major elements:

1. Prepare a timeline for project milestones that include all phases of the 2018 AI Update development inclusive of research, outreach, development, and Board of Commissioners approval process. Timeline must include proposed community meetings and stakeholder interviews and deadlines for posting of legal notices and advertisements. This timeline will be made available to the public to explain the process.
2. The 2018 AI Update pursuant to HUD guidelines will include the analysis of all data provided by HUD, local data, and current and historical fair housing concerns and community needs.
3. Strategy and approach, materials and handouts for coordination and facilitation of a minimum of two (2) public meetings designed to obtain citizen participation and input and public comment from key stakeholders relative to fair housing issues, contributing factors, and how they must be addressed in a public participation and consultation process. The finished product must include a description of public engagement, participation and consultation process, meeting format and content, a summary of comments received, and a description of how the comments were addressed or why they were not. Stakeholders represent: state and local government agencies involved in fair housing enforcement; private fair housing groups; equity-focused organizations; public-housing agencies including shelters; affordable housing developers; faith-based groups; civil rights groups; immigrant-focused organizations; groups representing populations that are typically underrepresented in the planning process, such as minority populations, persons living in ethnically-concentrated areas, limited-English speaking persons, and persons with disabilities; public housing residents; realtors; and lenders.
4. Provide an update to the analysis of impediments to fair housing choice using data provided by HUD, which includes geospatial data, tabular data, disproportionate housing needs, and outstanding

discrimination findings, to assess fair housing issues in the community. In addition, available local measures such as local housing policies and zoning codes must be reviewed for the assessment process.

5. A meaningful fair housing planning process is expected to use program-supplied data and locally supplied data. To that end, the County will assist in gathering data, holding workshops, and aid in collecting surveys. The Consultant's effort to further the research and clarify the information will be considered a reflection of interest and efficiency.
 - <https://www.hudexchange.info/programs/affh/>
 - <https://egis.hud.gov/affht/>
6. Summary of Analysis of Impediments documents from the County.
7. Summarize the County's Five-Year Consolidated Plan and Annual Action Plan and incorporate barriers identified and action steps into the 2018 AI Update.
8. Solicitation of public input from key stakeholders and other housing providers that serve the protected classes.
9. Prepare draft public hearing notices and other public notices as applicable.
10. Provide four (4) hard copies marked ORIGINAL and 1 electronic/digital (I.e. flash drive) copy of the approved final document in Microsoft Office Word. In addition, the final document shall be provided with all proposal sections, graphics, and attachments in color and clearly labeled.
11. Include in the document a resource directory and, at a minimum, include: a list of data sources, back-up data collected, consultation records, correspondence, and other supporting documentation used in developing the AI Update.
12. The winning bidder will collaborate with the CDBGPO in the identification, development, and solicitation of public input from key stakeholders and other housing providers that serve the protected classes.

Submission Requirement

Scope of Work (Consolidated Plan & First-Year Annual Action Plan Preparation):

Specifically, the scope of the work for the Preparation of the Five-Year Consolidated Plan (2024 – 2028) and the First-Year Annual Action Plan (2024) will result in a finalized Five-Year Consolidated Plan and Annual Action Plan, including, but not limited to, public input, citizen participation, and needs assessment, and as such, the proposal must detail "The Work" and must include the following major elements:

I. Process Preparation

13. Obtain authorization and passwords for use of HUD's IDIS online reporting system.
14. Review current HUD Consolidated Plan regulations and guidance, particularly changes made since 2010. The specific requirements for the Consolidated Plan can be found in the Code of Federal Regulations, Title 24, Section 91, et. seq. (24 CFR 91). Regulations, notices and guidance for preparing a Consolidated Plan submission can be found at (but not limited to): <https://www.hudexchange.info/programs/consolidated-plan/>.
15. Review any revisions and additions to the consolidated plan process and/or the consultation process for incorporating the requirements of affirmatively furthering fair housing.

16. Review Cherokee County's existing Citizens Participation Plan. All consultation and the scope of work shall be undertaken as provided in the Citizens Participation Plan.
17. Review the requirements for using the Consolidated Plan template in IDIS and discuss the format of the plan with the CDBG Program Office. Discuss how the plan may differ from the format of the 2019 Consolidated Plan, also taking into consideration any federal regulation changes, and the most recent HUD notices and guidance, Office of Fair Housing requirements and OMB requirements.
18. Review e-mails from HUD representatives (to be provided by the CDBG Program Office) relating to the Consolidated Plan process.
19. Review HUD's most recent Consolidated Plan and Annual Action Plan Completeness Checklist for Entitlement Grantees
20. Prepare a timeline for project milestones that encompass all phases of the development of the ConPlan and First-Year Annual Action Plan inclusive of research, outreach, development, and Board of Commissioners approval process. Timeline must include proposed community meetings and stakeholder interviews and deadlines for posting of legal notices and advertisements. This timeline will be made available to the public to explain the process.
21. Prepare a display board of the low to moderate income areas.

Note: Consultant is responsible for being up-to-date and adhering to all HUD requirements for complete submission of the 5 Year Consolidate Plan and one-year Action Plan.

II. Needs Assessment

The Consultant shall gather factual and broad community input through citizen participation and data collection including:

1. Review of available data, reports and documents including, but not limited to, Home Mortgage Disclosure Act, State Unemployment Insurance, property assessments, building permits, National Low-Income Housing Coalition's annual Out of Reach report, Dun and Bradstreet, real estate transactions, foreclosures.com data, and the U.S. Census data.
2. Presentations at community and public meetings and moderating discussions (including preparing, copying, and distributing bilingual handouts/guidebooks and preparation of meeting minutes) to gather community input on the community needs. This will include:
 - a. An initial public meeting at the County Administration Building;
 - b. An evening meeting with the Canton Housing Authority;
 - c. At least one neighborhood meeting (the consultant will be responsible for providing Spanish translation at one neighborhood meeting); and
 - d. Daytime focus group meetings, along with interviews with community stakeholders - to be determined with the CDBGPO staff and consultant but at a minimum should include representatives from County departments that utilize CDBG funds for projects, business community, housing agencies, social service agencies, CHDO representatives, and other individuals deemed appropriate.

3. Prepare summary of comments, conduct analysis, and assess data gathered and develop 5-year priority recommendations incorporating factual data and public input collected to support those recommendations.

III. Preparation of the 5-Year Consolidated Plan & First-Year Action Plan

- 1.
2. Develop a draft Consolidated Plan that includes 5-year funding goals, priorities, and strategies, along with proposed accomplishments and performance measurements.
3. Develop a draft PY24 Annual Action Plan that includes proposed activities, proposed accomplishments and performance measurements using the format of the PY23 Action Plan.
4. Prepare submission of the 5-year Consolidated Plan and the PY24 Annual Action Plan through the templates in IDIS
5. Prepare maps to include in the plans (using HUD's CPD maps, as applicable).
6. Prepare tables, charts, illustrations, and photographs to include in plans.
7. Provide interval copies of plan sections to Cherokee County CDBGPO for review and comment before public draft of plan is finalized.
8. The Consultant is responsible for submitting a pdf version of the draft Consolidated Plan and Annual Action Plan for making copies.
9. Present drafts of both documents at a public meeting and prepare meeting minutes.

IV. Finalization of the 5-Year Consolidated Plan and First-year Action Plan

1. Prepare last draft of both the Consolidated Plan and Annual Action Plan, incorporating information received at the public meeting, public comments, and comments from CDBGPO. Last draft to be reviewed by the CDBGPO prior to finalization.
2. Prepare HUD's Consolidated Plan and Annual Action Plan Completeness Checklist for Entitlement Grantees
3. Provide all final work products to the CDBGPO.

FINAL WORK PRODUCTS (CONPLAN & FIRST-YEAR ANNUAL ACTION PLAN):

The Consultant is responsible for submitting 1 bound (with original signatures) and 9 bound color copies each of the final Consolidated Plan and Annual Action Plan (binding to be determined) and one (1) unbound and reproducible master hard copy of each document, including maps and graphics, no later than May 10, 2024. The Consultant is also responsible for finalizing and submitting the online submission of the Consolidated Plan and Annual Action Plan to HUD using HUD's templates in the eCon Planning Suite by the May 24, 2024 deadline.

The Consultant is also responsible for providing one (1) copy of the final Consolidated Plan and Annual Action Plan a digital storage device (I.e. flash drive).

The Consultant will submit a reproducible copy of all maps, graphics, slide presentations, surveys, guidebooks/handouts, and photographs to the CDBGPO. Presentation materials, such as display boards, slides, videos, etc., shall be submitted to the CDBGPO.

END OF STATEMENT OF WORK/SPECIFICATION

APPENDIX “A”

2018 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Cherokee County Analysis of Impediments to Fair Housing Choice

April 2018

Prepared for
Cherokee County, Georgia
by



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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 in 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 compliant 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 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.

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 lower-cost 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%);
 - Displacement of residents due to rising housing costs (58.82%); and
 - 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 up 10.36%.

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 foreign-born 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. Demographics						
Race/Ethnicity	Cherokee County		Atlanta-Sandy Springs-Roswell Region			
	#	%	#	%		
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) Language						
#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%

Demographics (continued)						
Limited English Proficiency (LEP)	Cherokee County			Atlanta-Sandy Springs-Roswell Region		
	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

Race/Ethnicity	Cherokee County							
	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)

Race/Ethnicity	Atlanta-Sandy Springs-Roswell Region							
	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

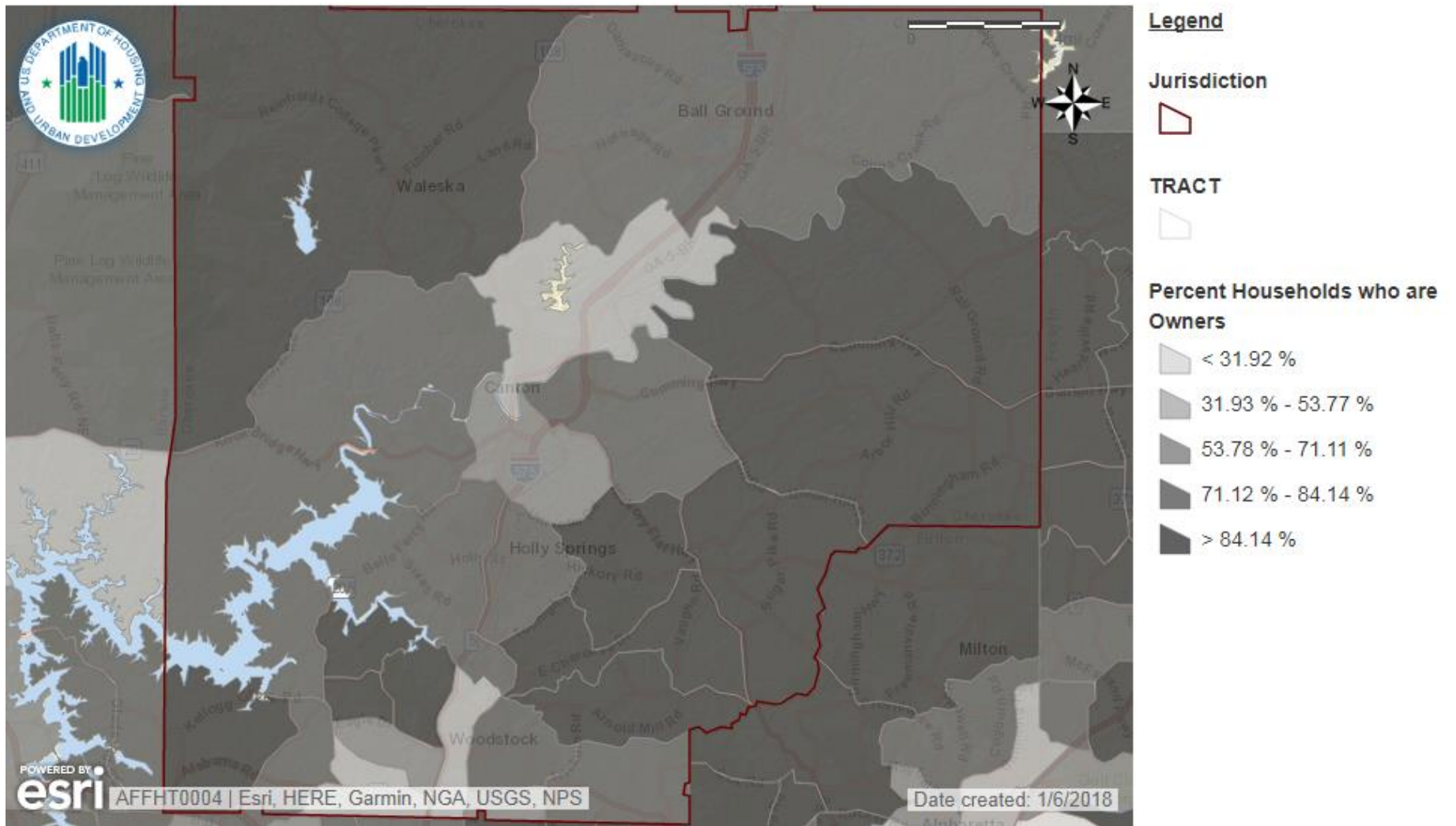
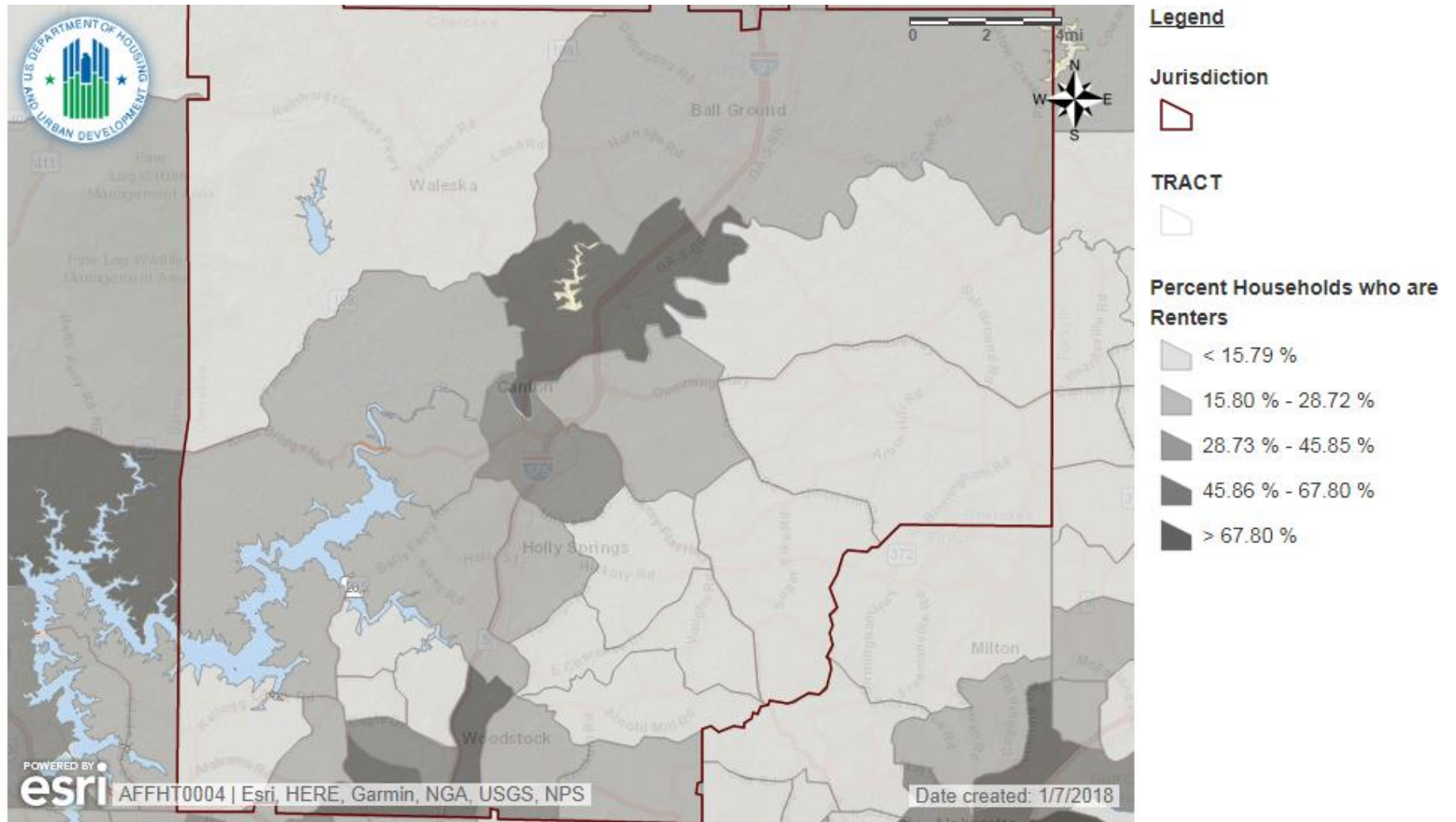


Figure 2. Share of Households that are Renters in Cherokee County



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

¹ 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/ressest/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

Race/Ethnicity Dissimilarity Index	Cherokee County				Atlanta-Sandy Springs-Roswell Region			
	Trends			Current (2010)	Trends			Current (2010)
	1990	2000	2010		1990	2000	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.

[illegible]

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

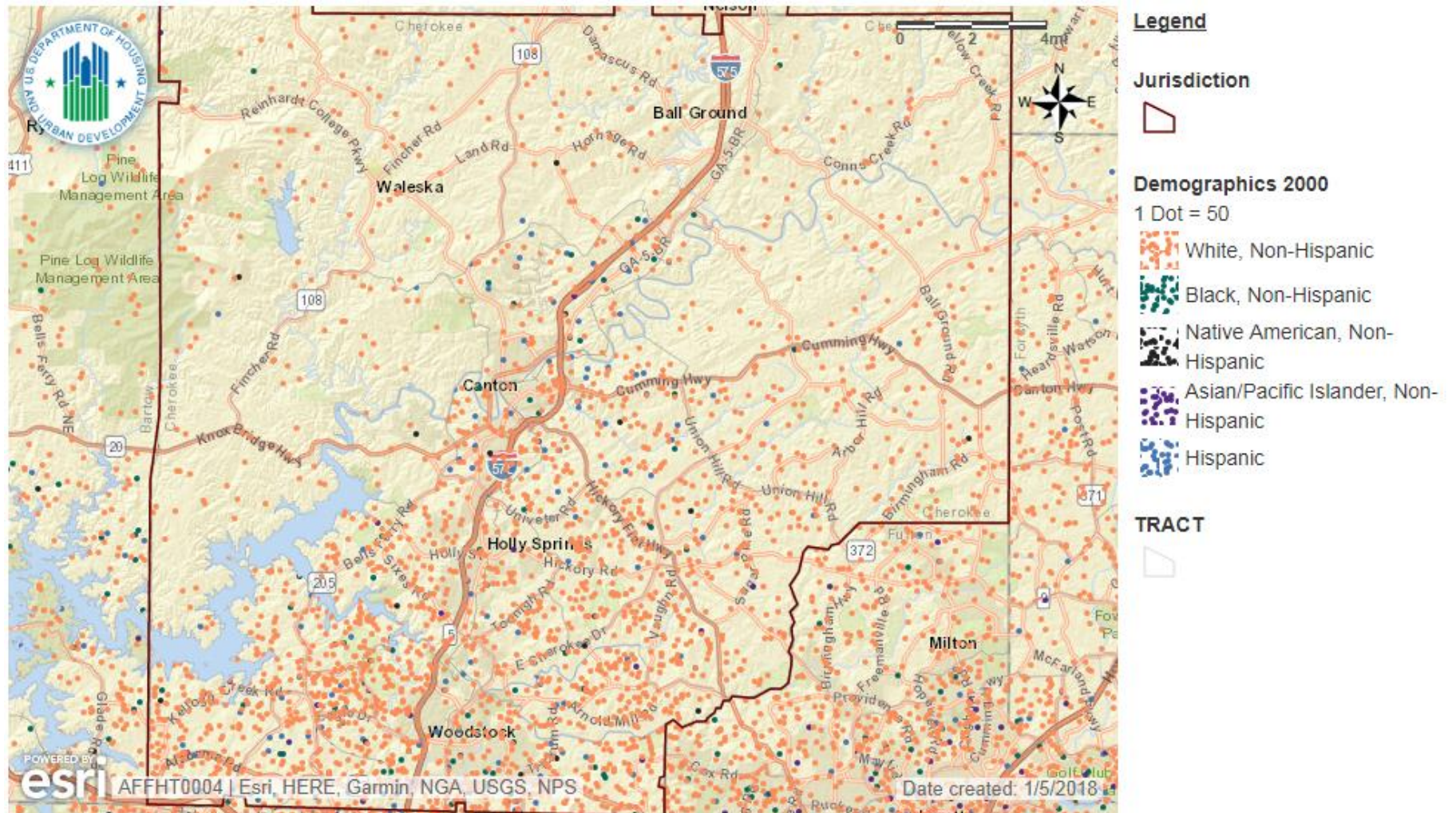


Figure 5. Population by Race and Ethnicity in Cherokee County, 1990

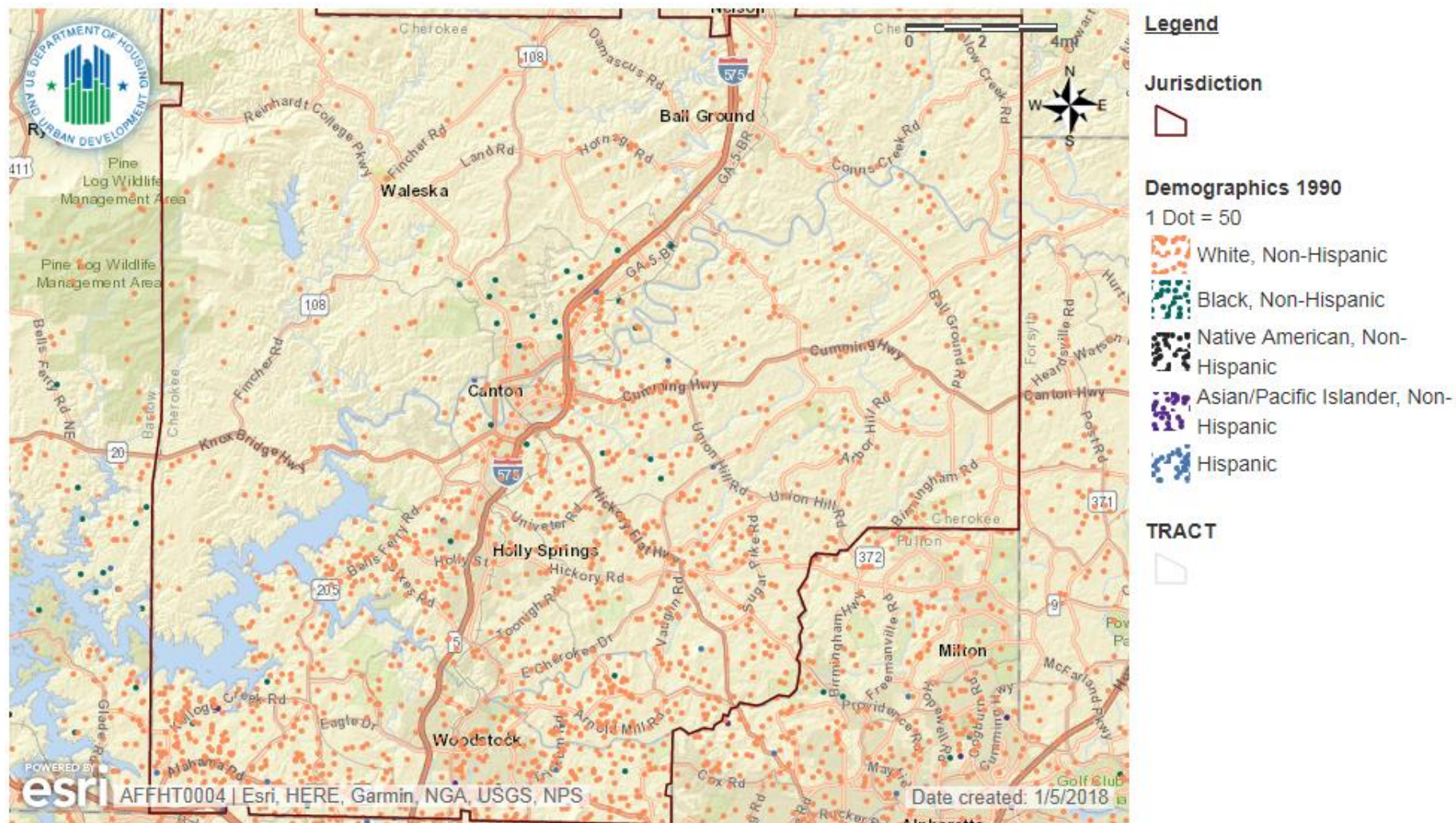


Figure 6. Foreign-Born Population by Nationality in Cherokee County

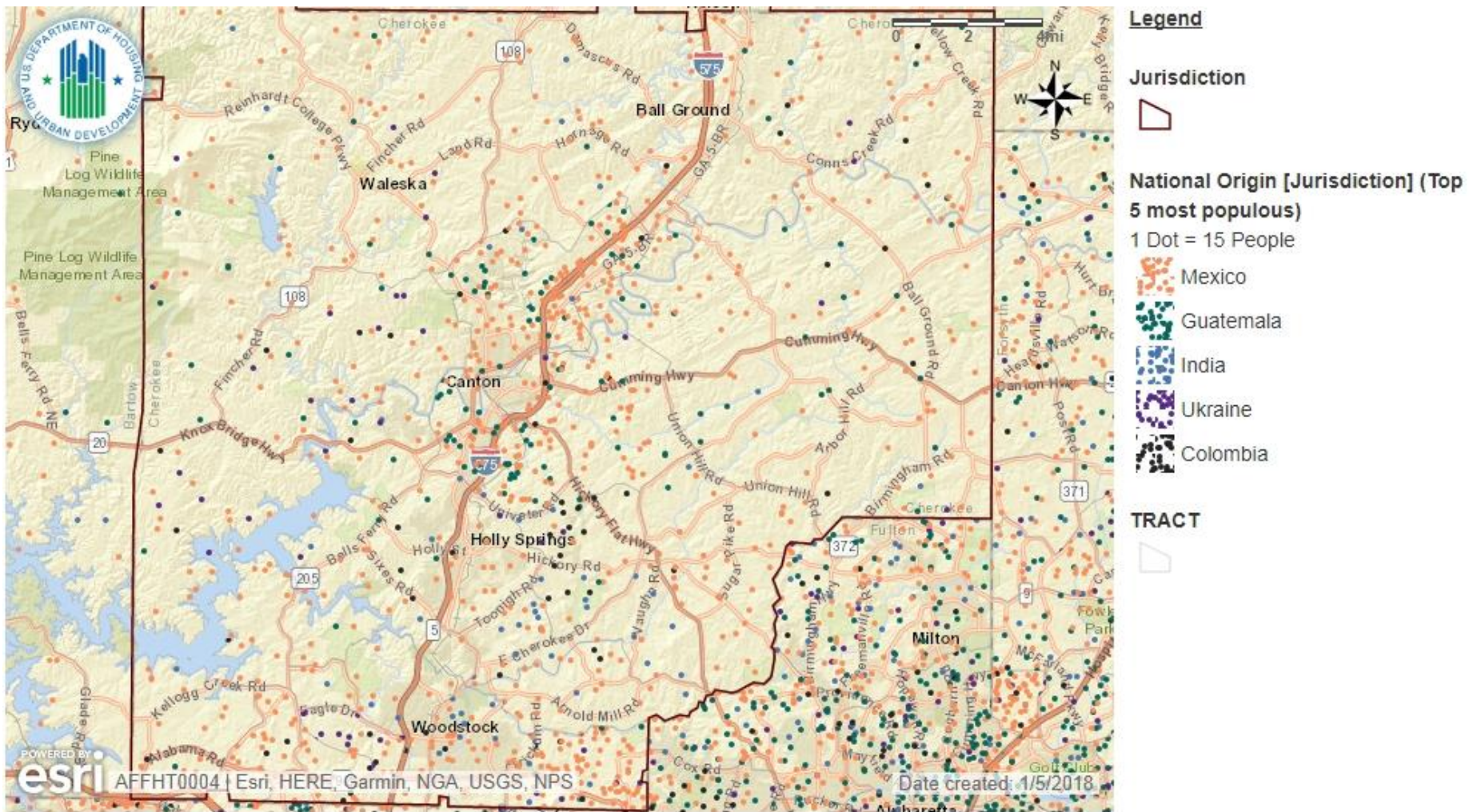
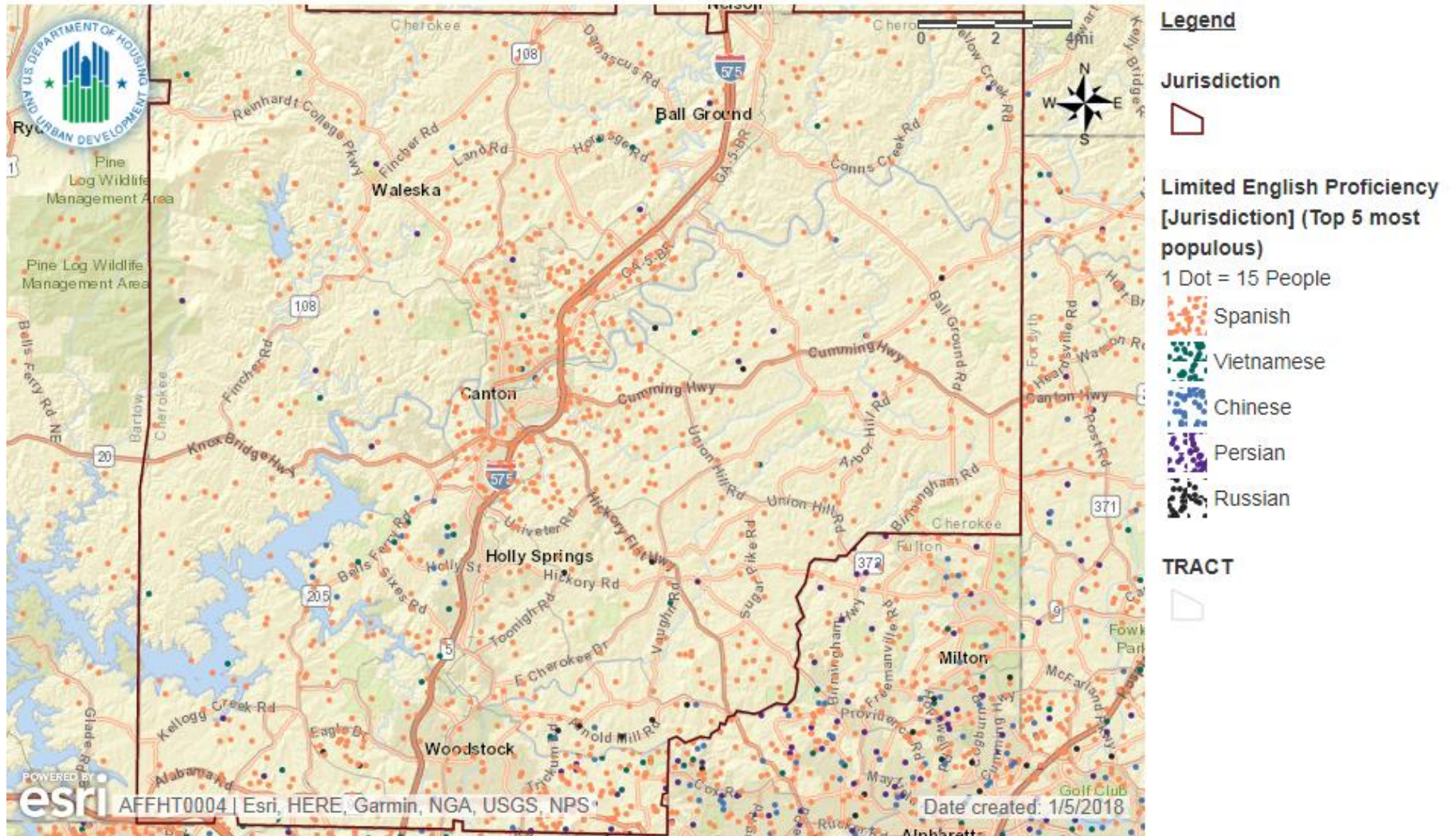


Figure 7. Persons with Limited English Proficiency in Cherokee County



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 a 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

- a. 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 likely 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

R/ECAP Race/Ethnicity	Cherokee County		Atlanta-Sandy Springs-Roswell Region		
	#	%	#	%	
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
Cherokee County Total Population							
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 than 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.

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

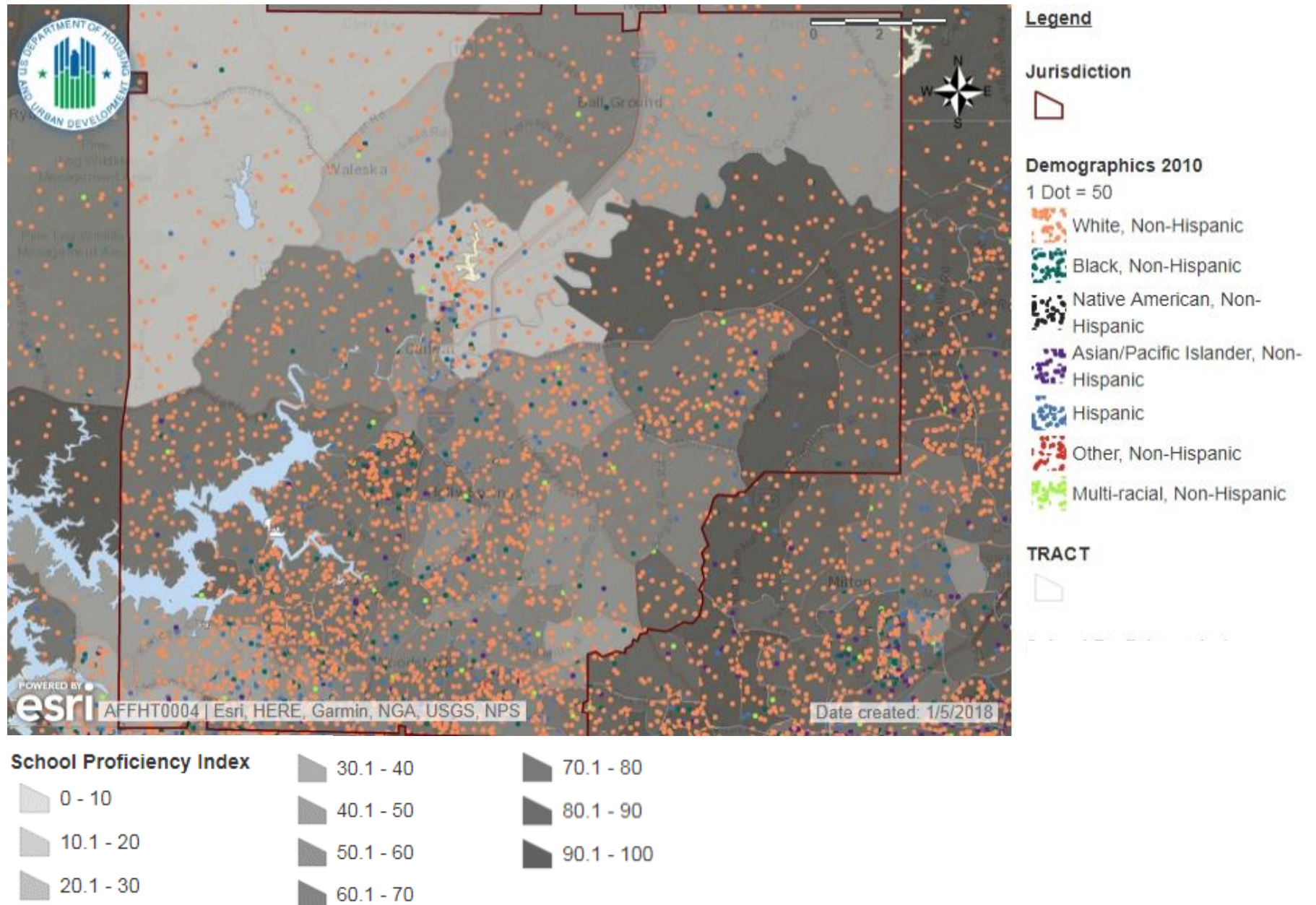


Figure 9. School Proficiency Index and National Origin in Cherokee County

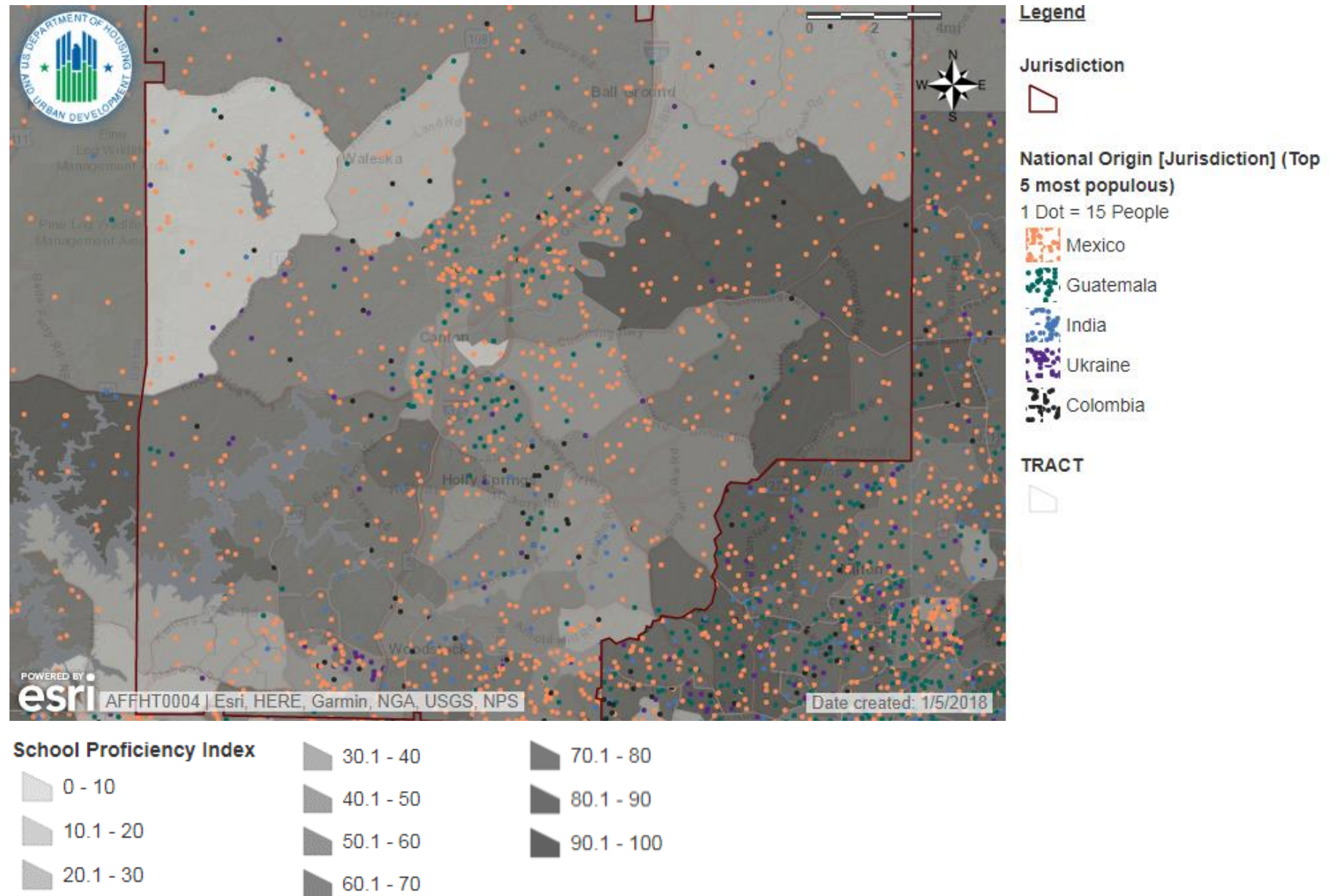
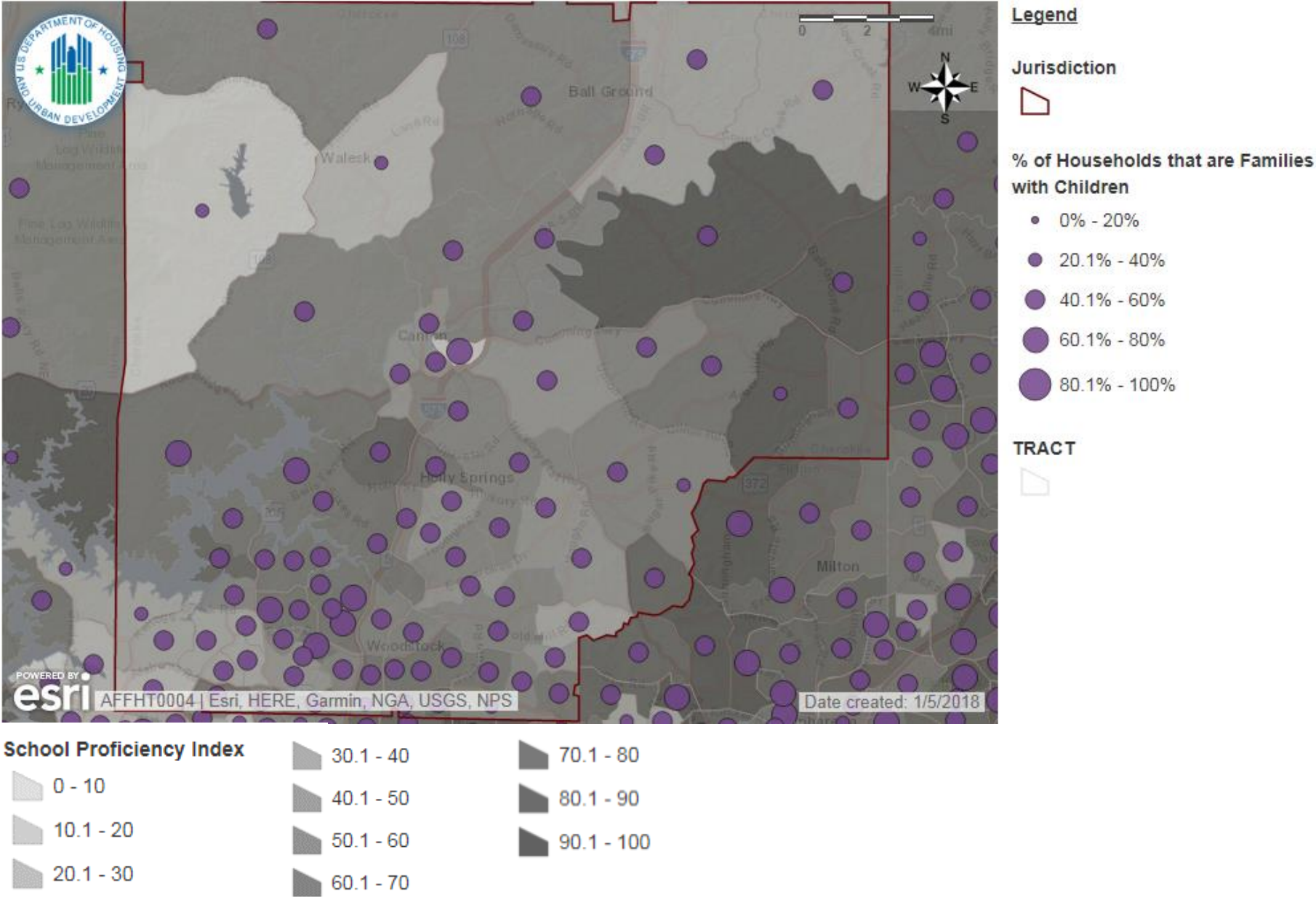


Figure 10. School Proficiency Index and Households with Children in Cherokee County



b. Employment Opportunities

i. 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.

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

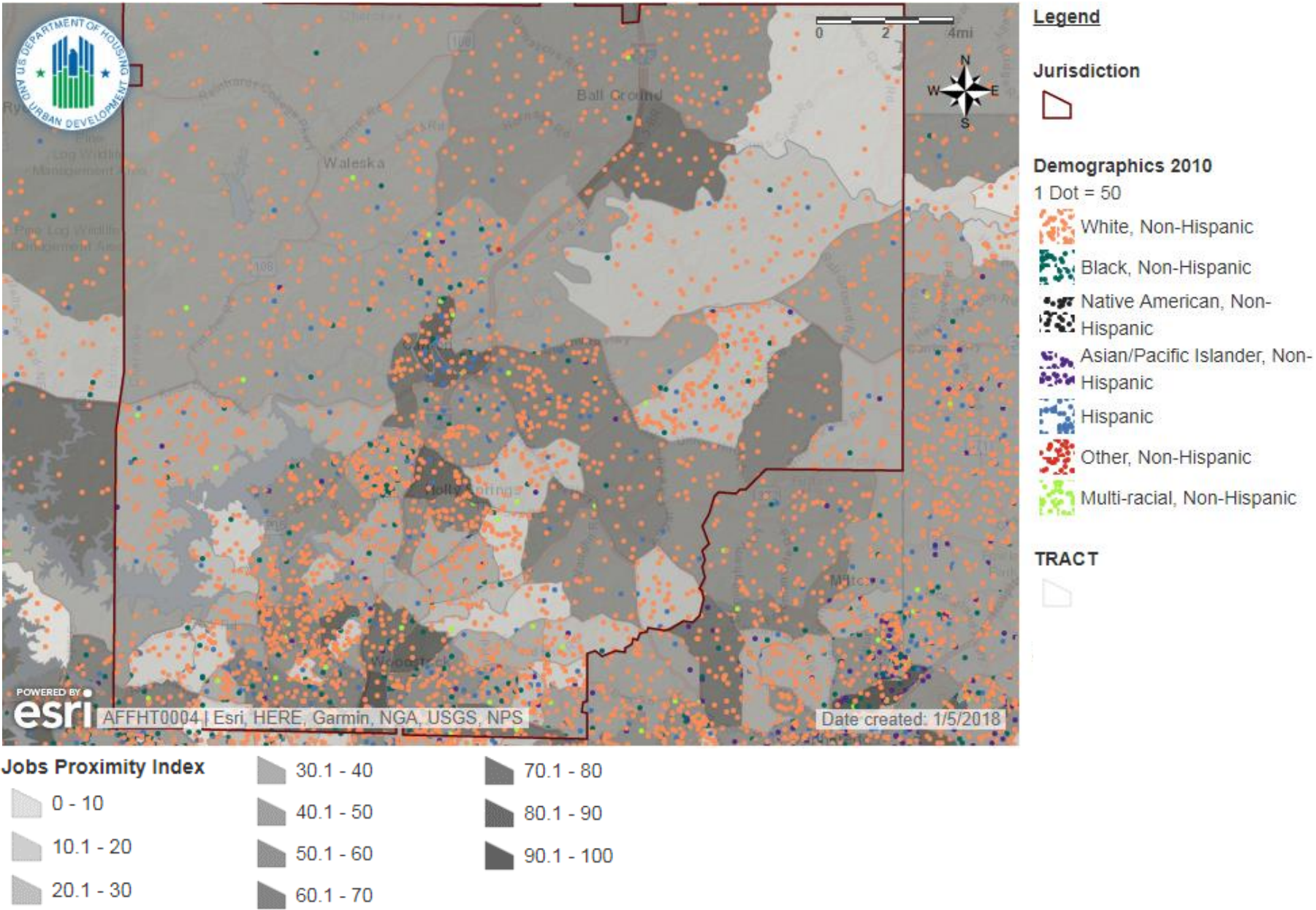


Figure 12. Labor Market Index and Race/Ethnicity in Cherokee County

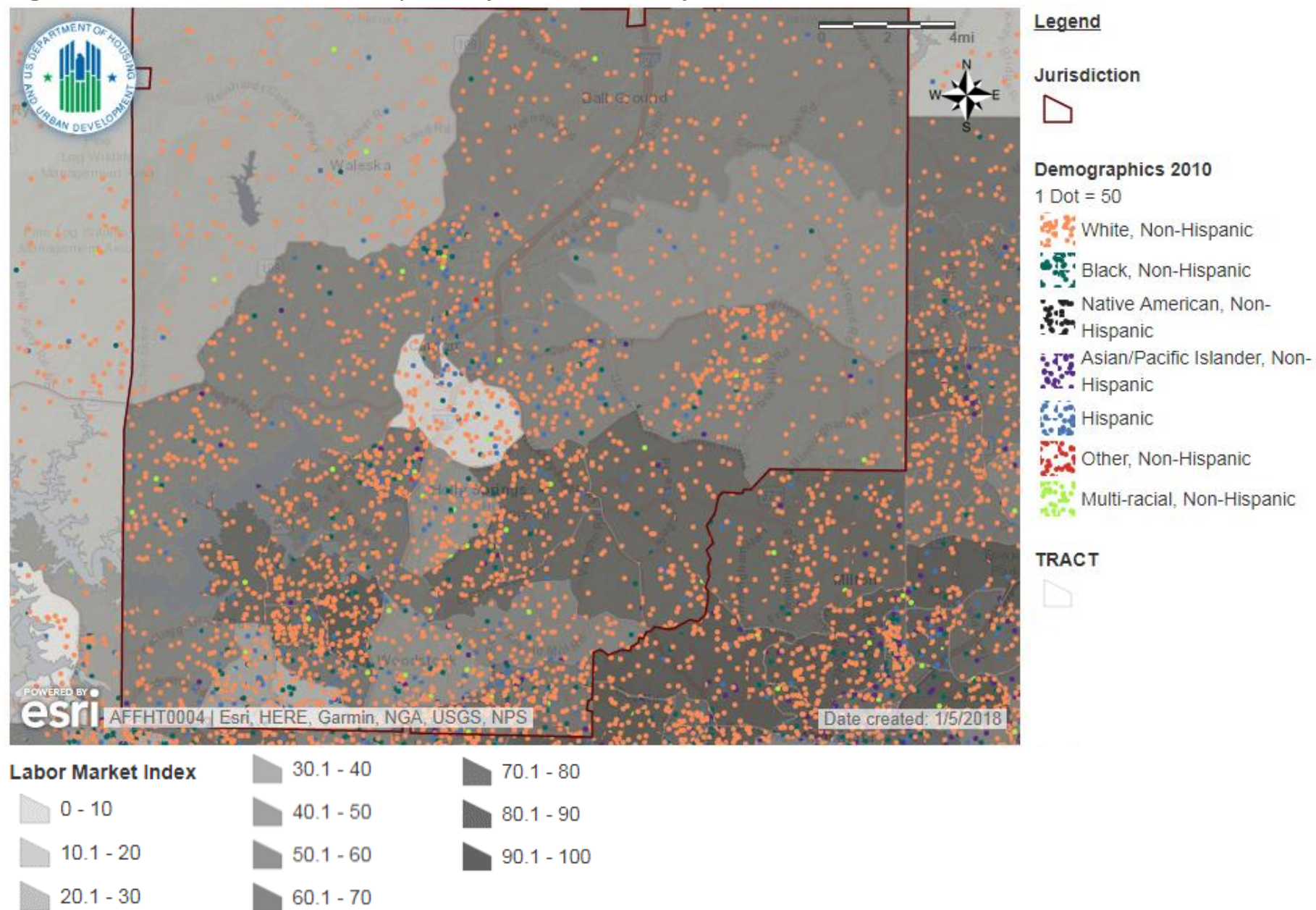


Figure 13. Jobs Proximity Index and National Origin in Cherokee County

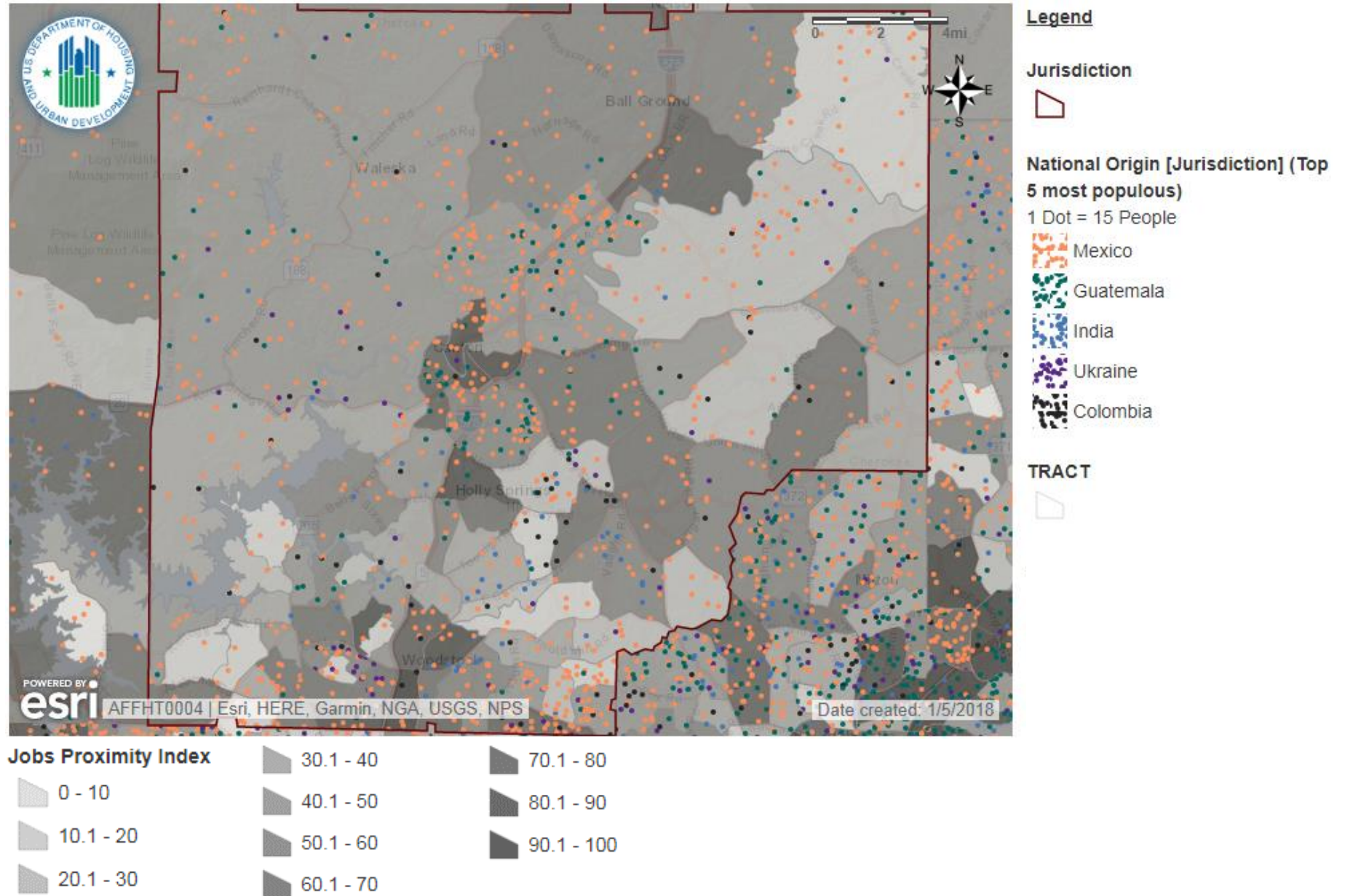


Figure 14. Labor Market Index and National Origin in Cherokee County

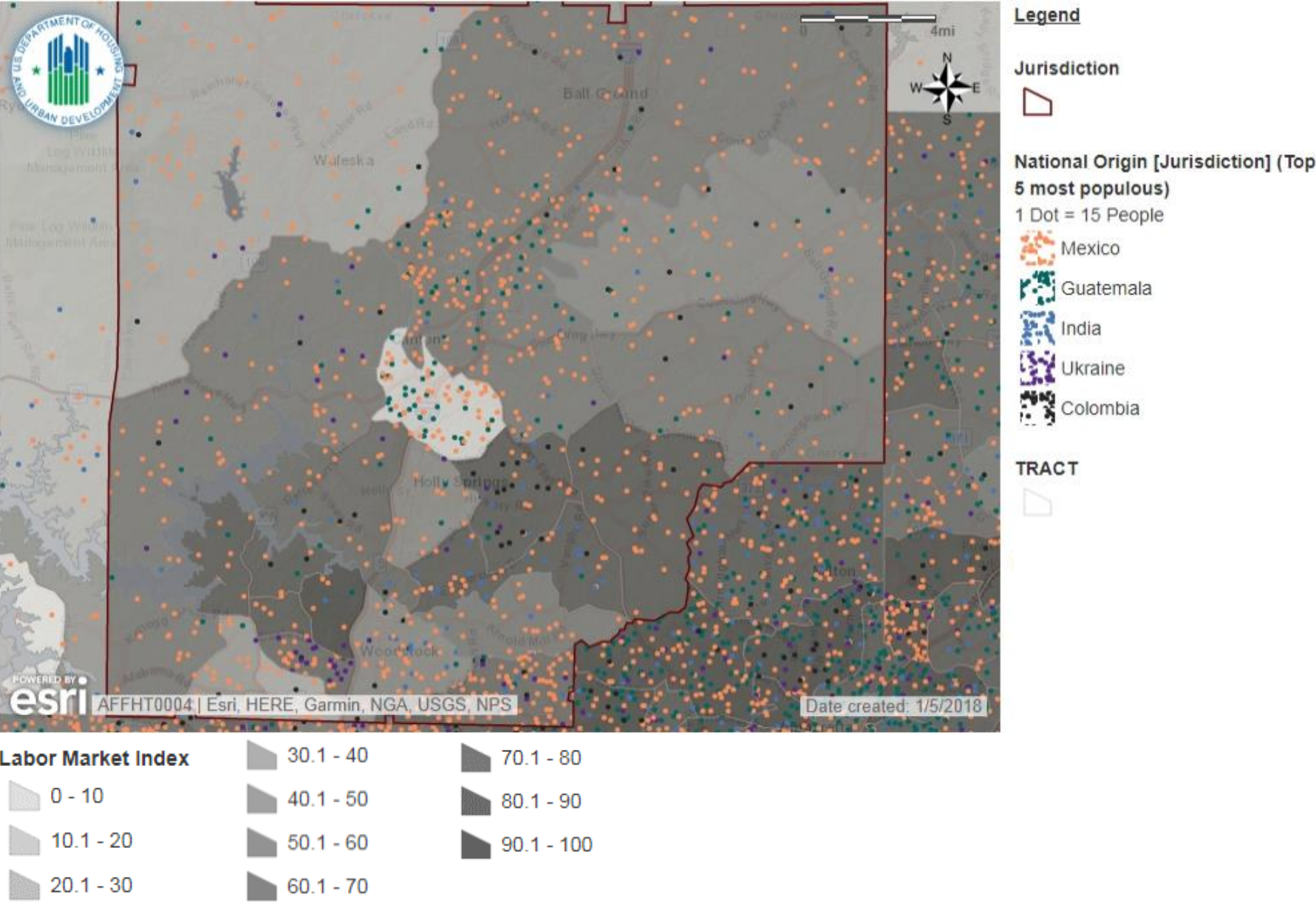


Figure 15. Jobs Proximity Index and Households with Children in Cherokee County

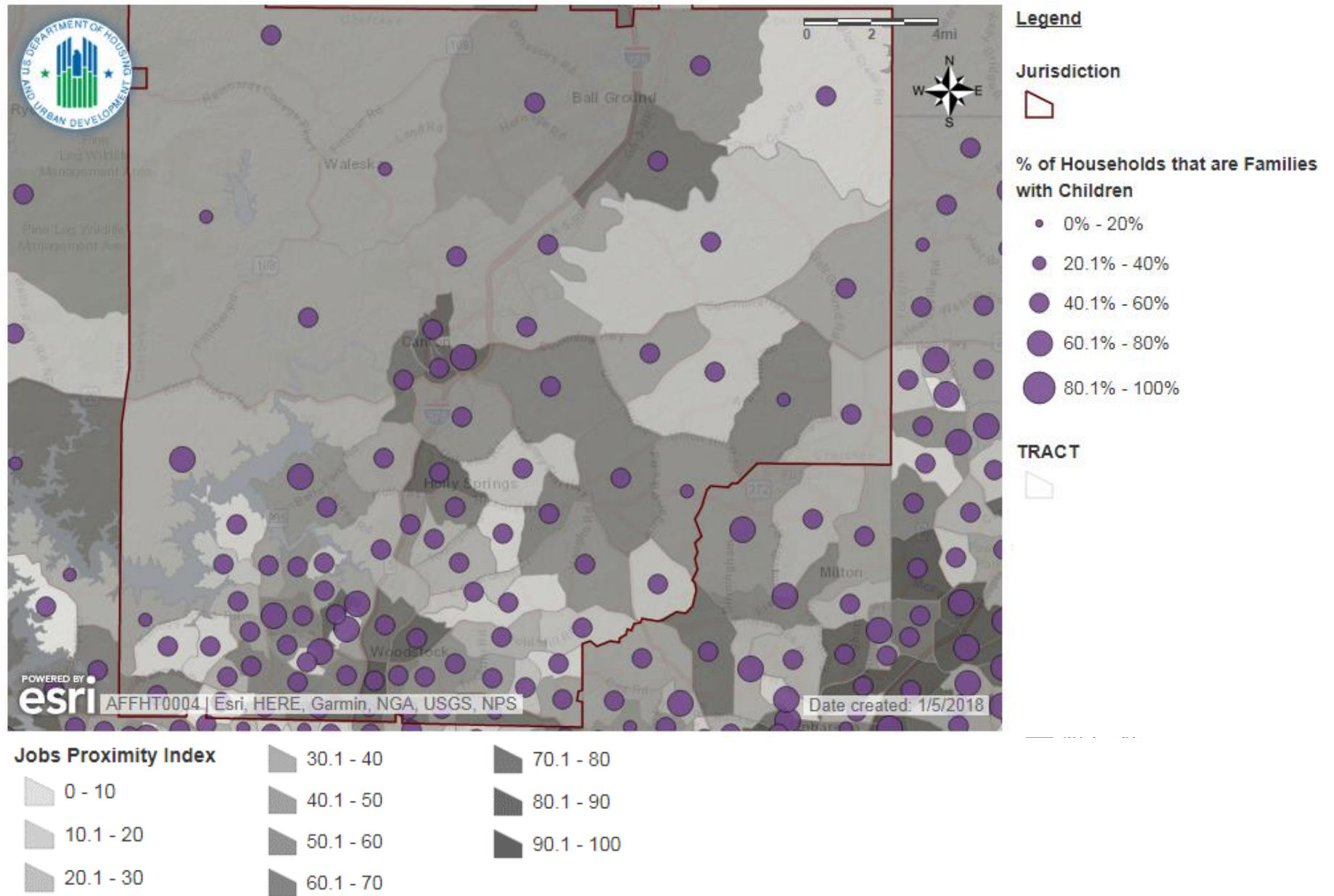
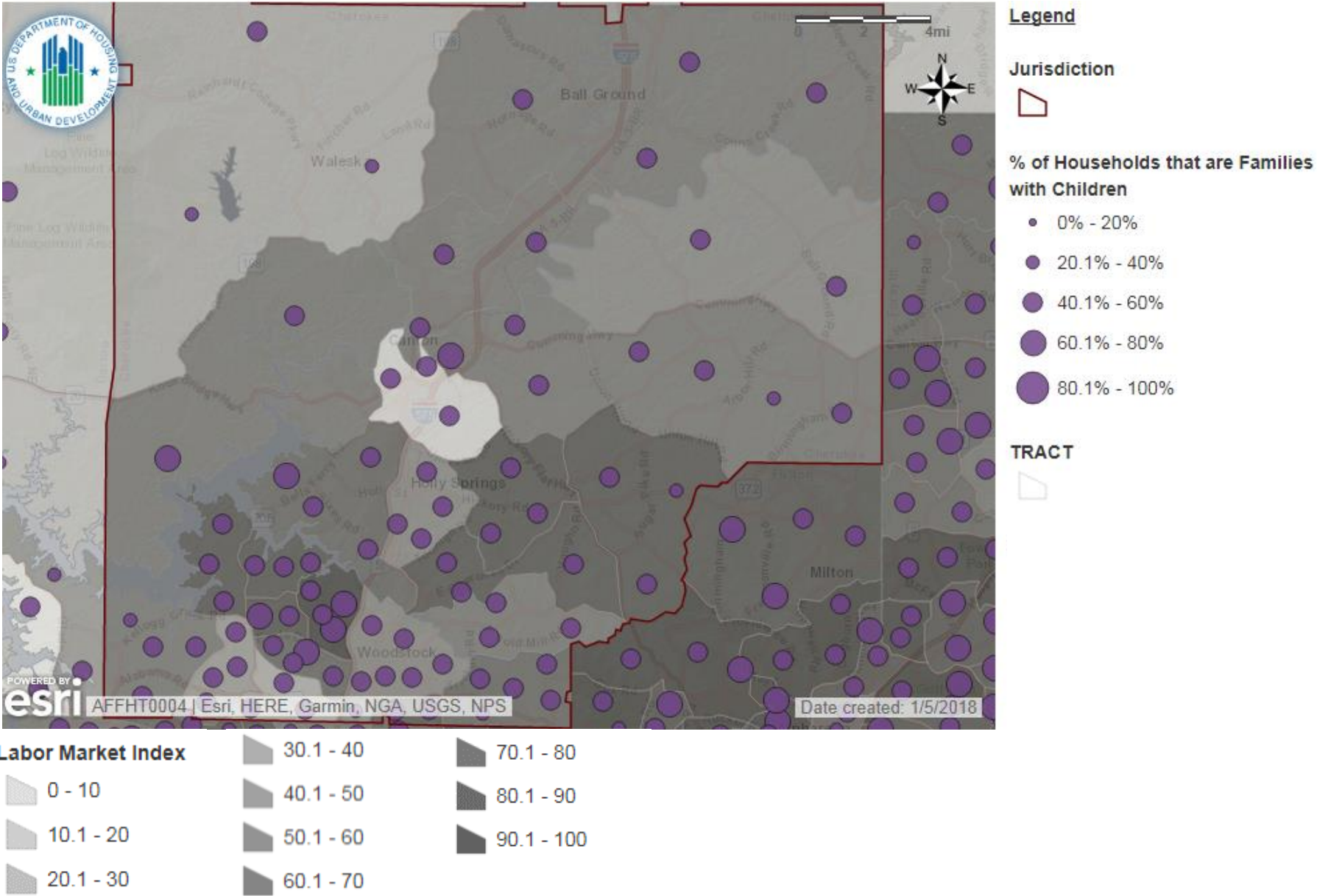


Figure 16. Labor Market Index and Households with Children in Cherokee County



c. Transportation Opportunities

- i. 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

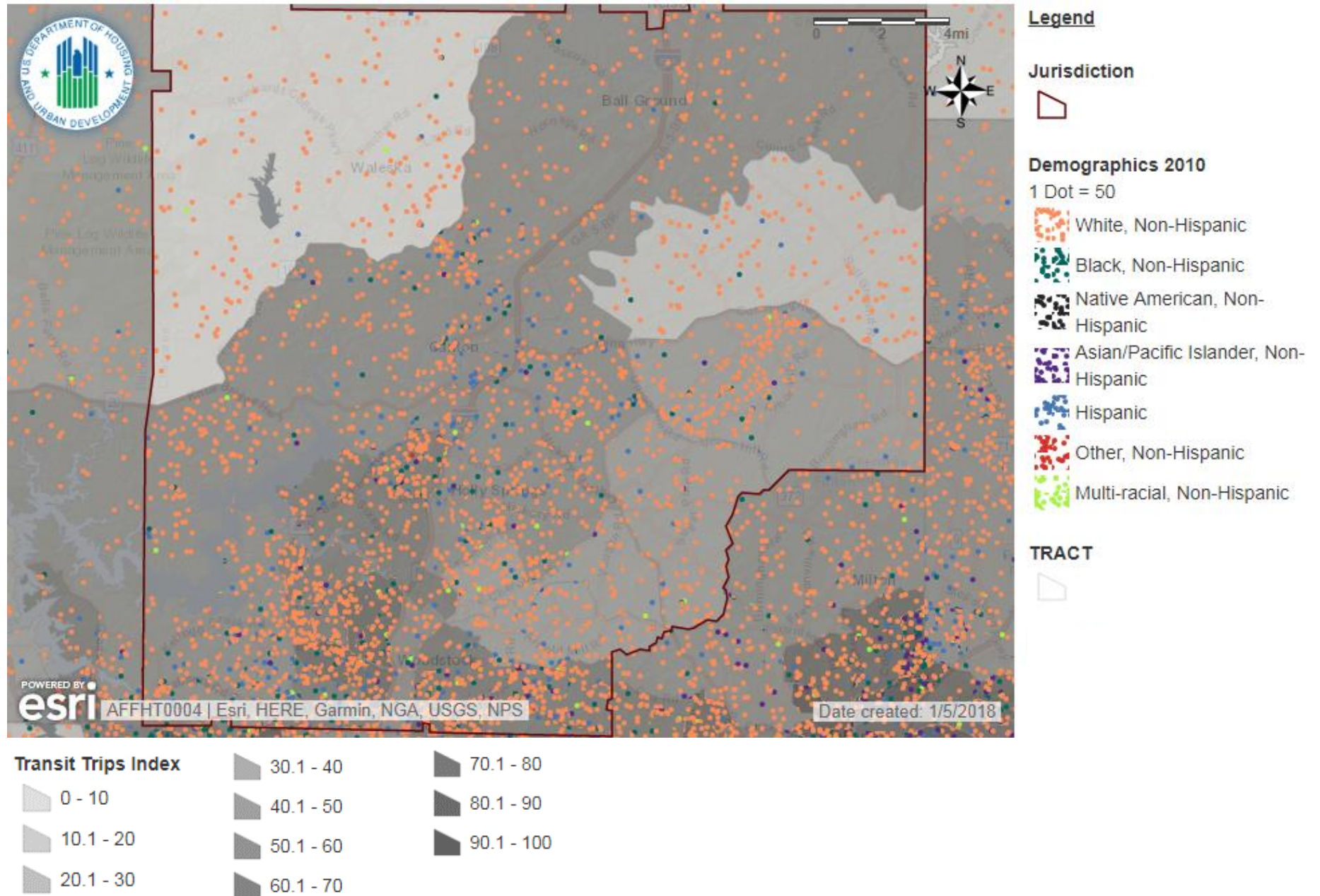


Figure 18. Low Transportation Cost Index and Race/Ethnicity in Cherokee County

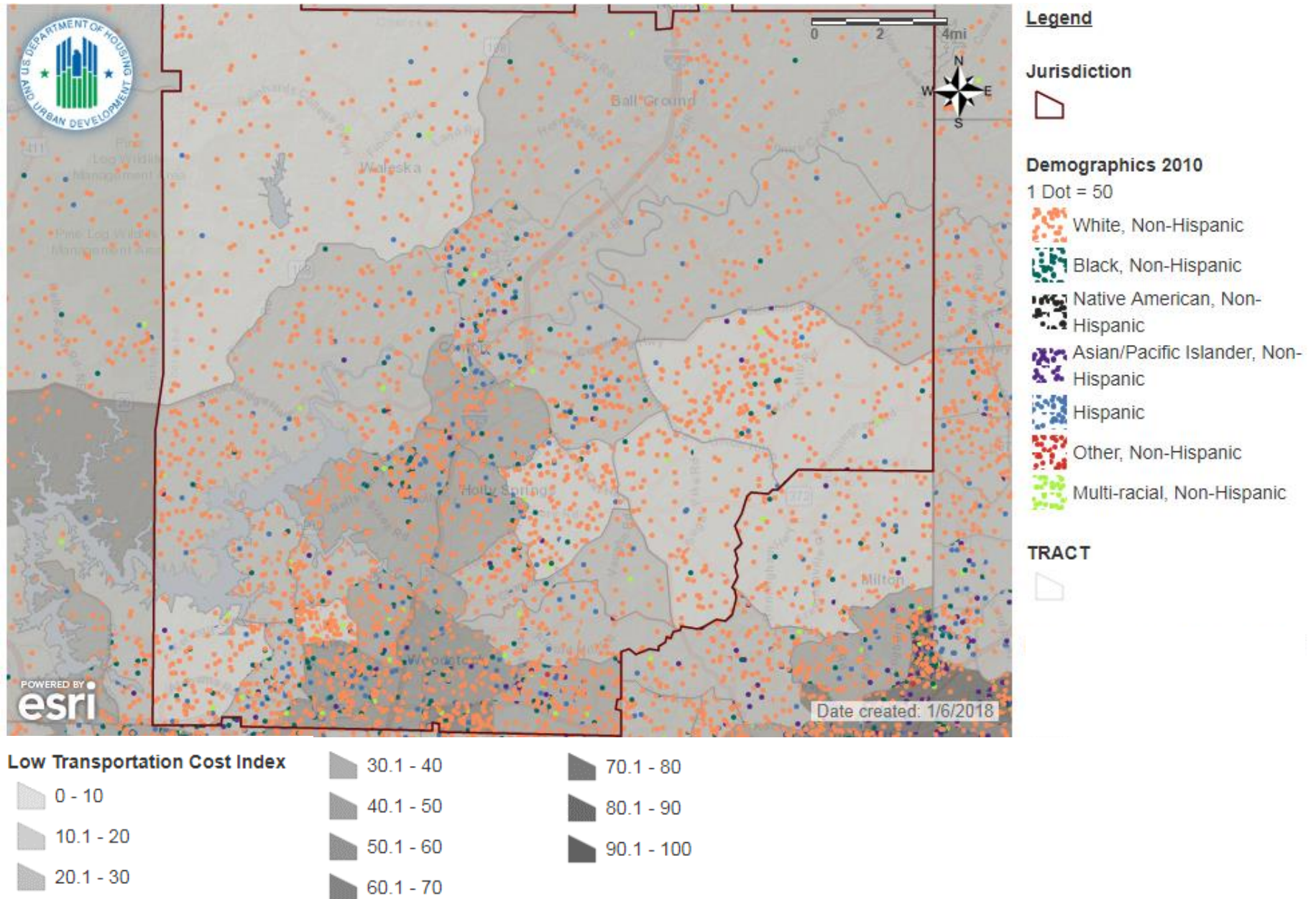


Figure 19. Transit Trips Index and National Origin in Cherokee County

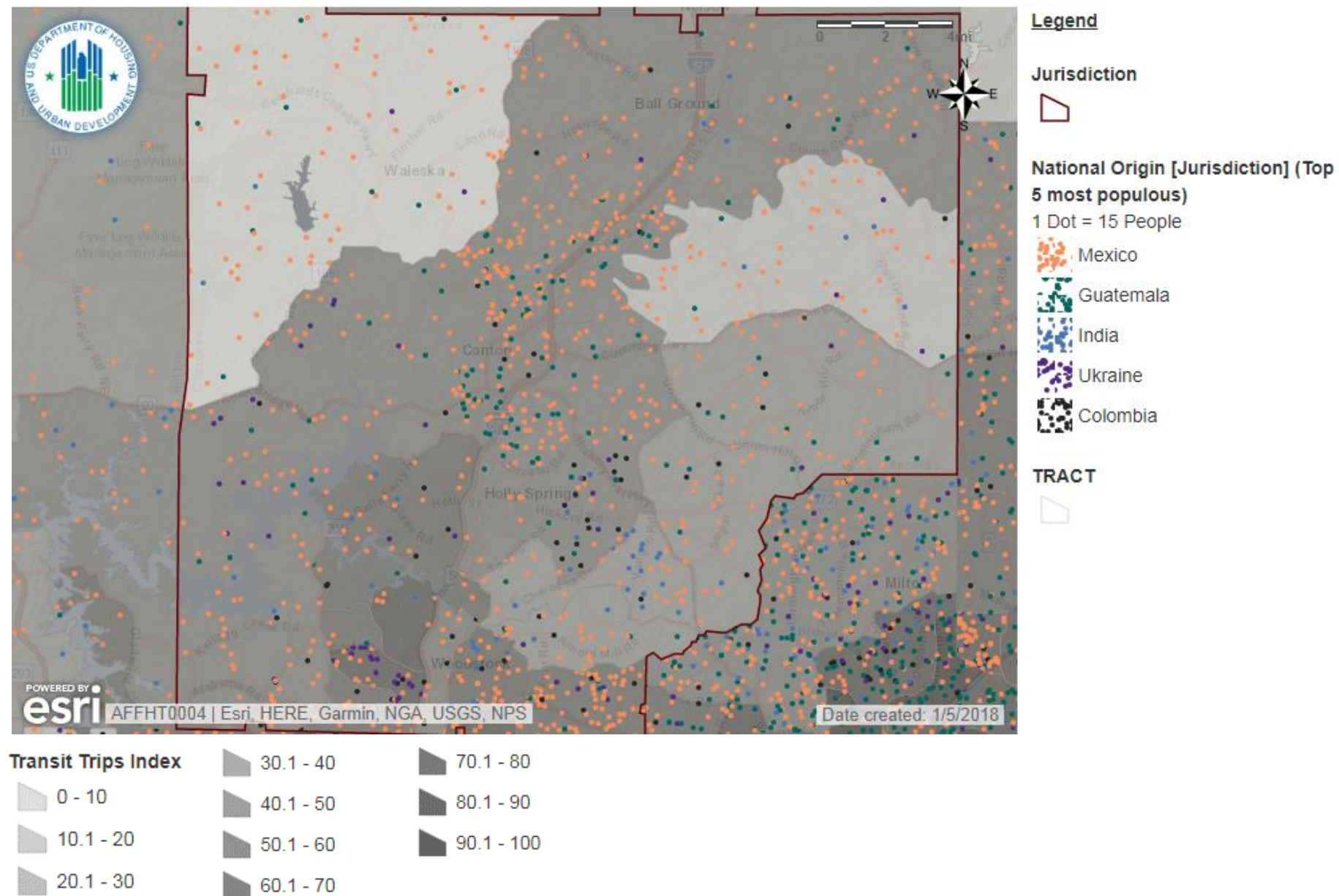


Figure 20. Low Transportation Cost Index and National Origin in Cherokee County

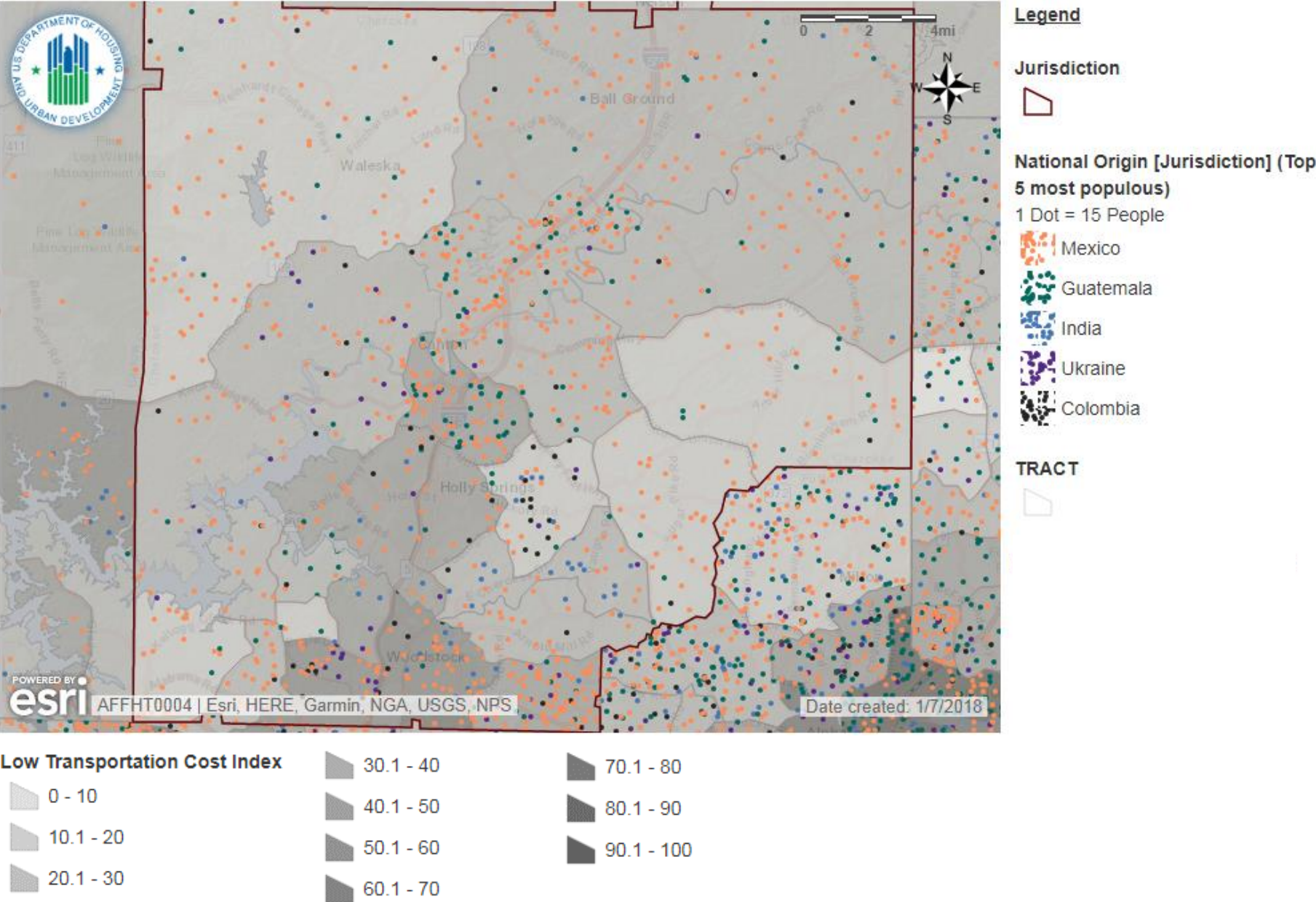


Figure 21. Transit Trips Index and Households with Children in Cherokee County

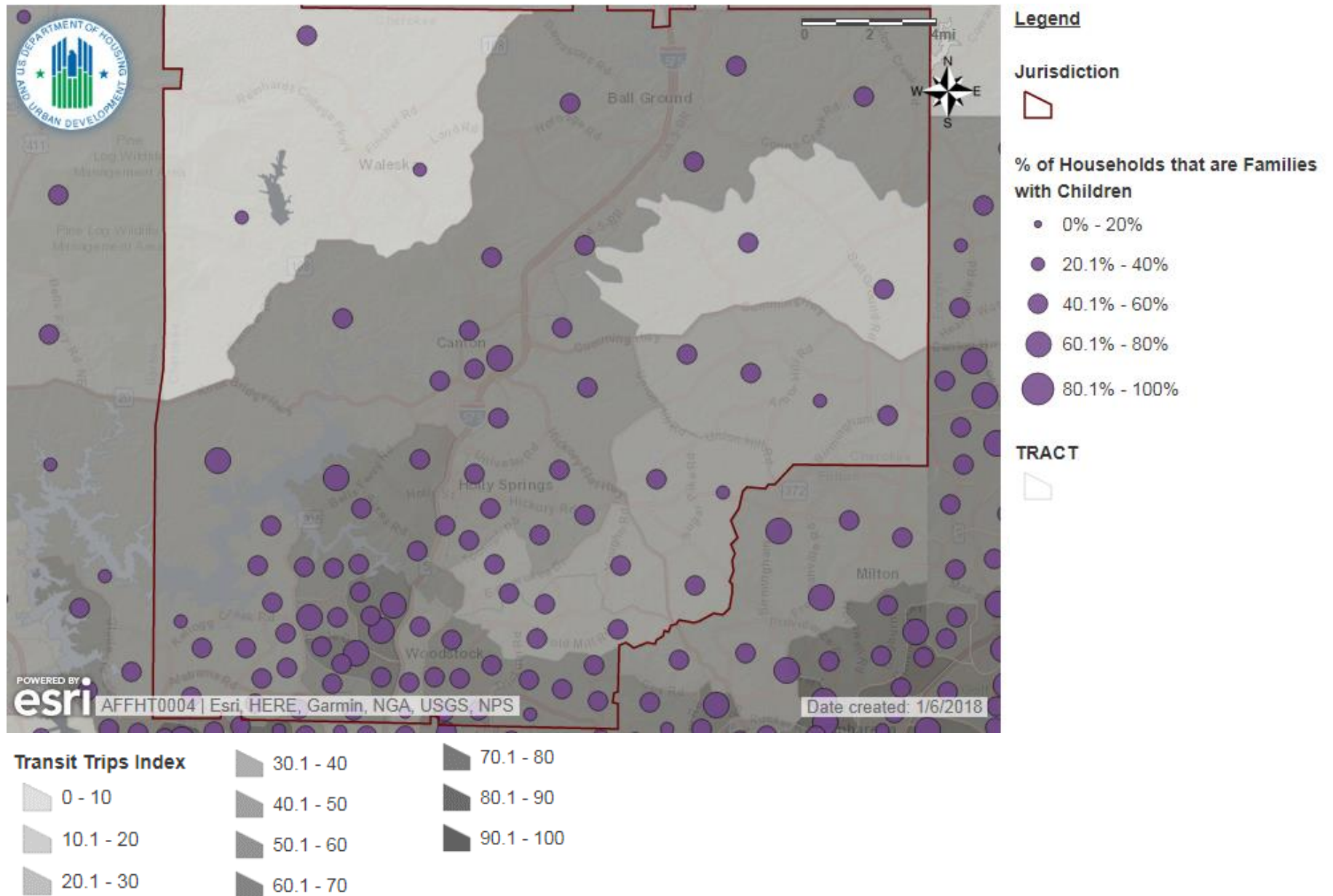
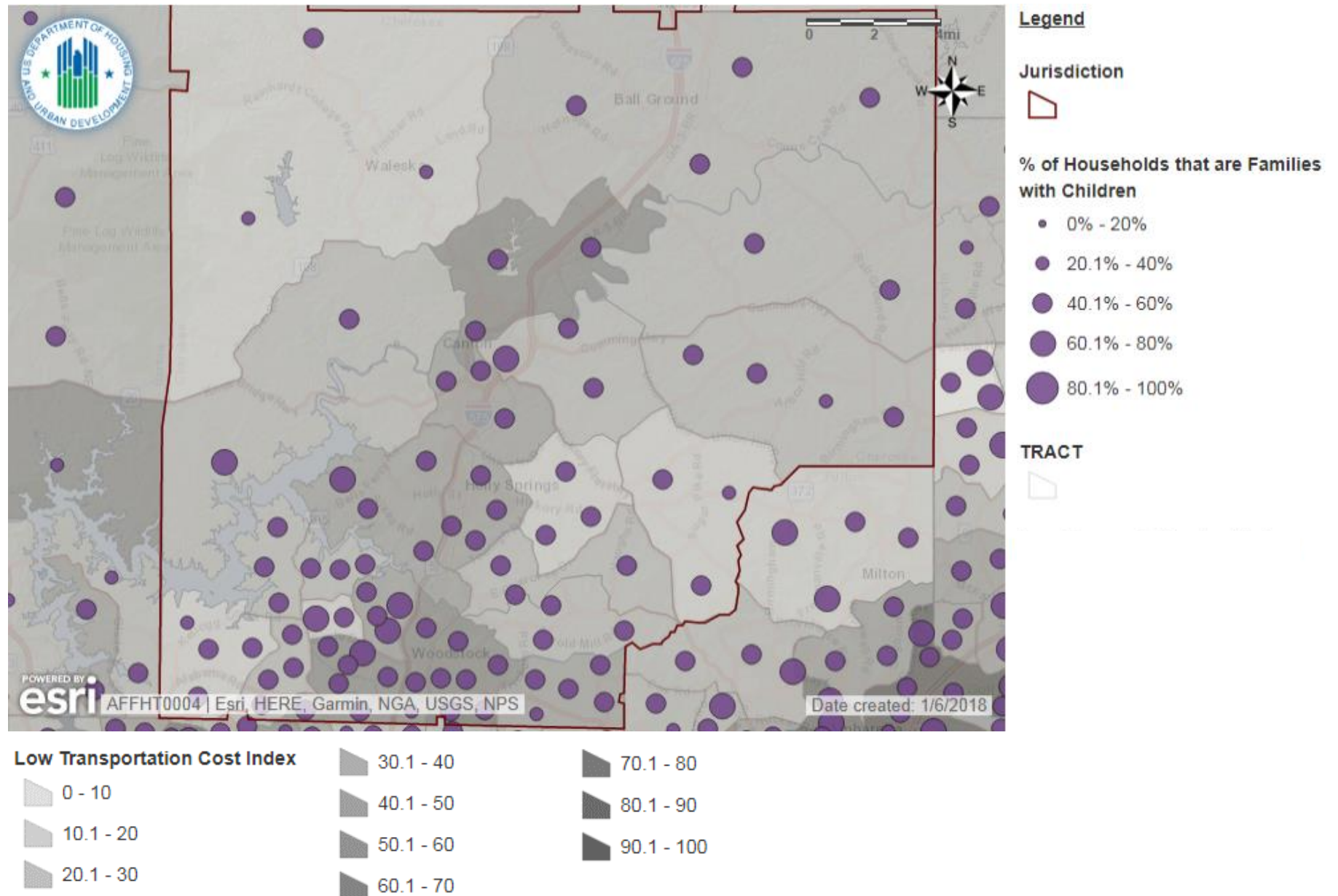


Figure 22. Low Transportation Cost Index and Households with Children in Cherokee County



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

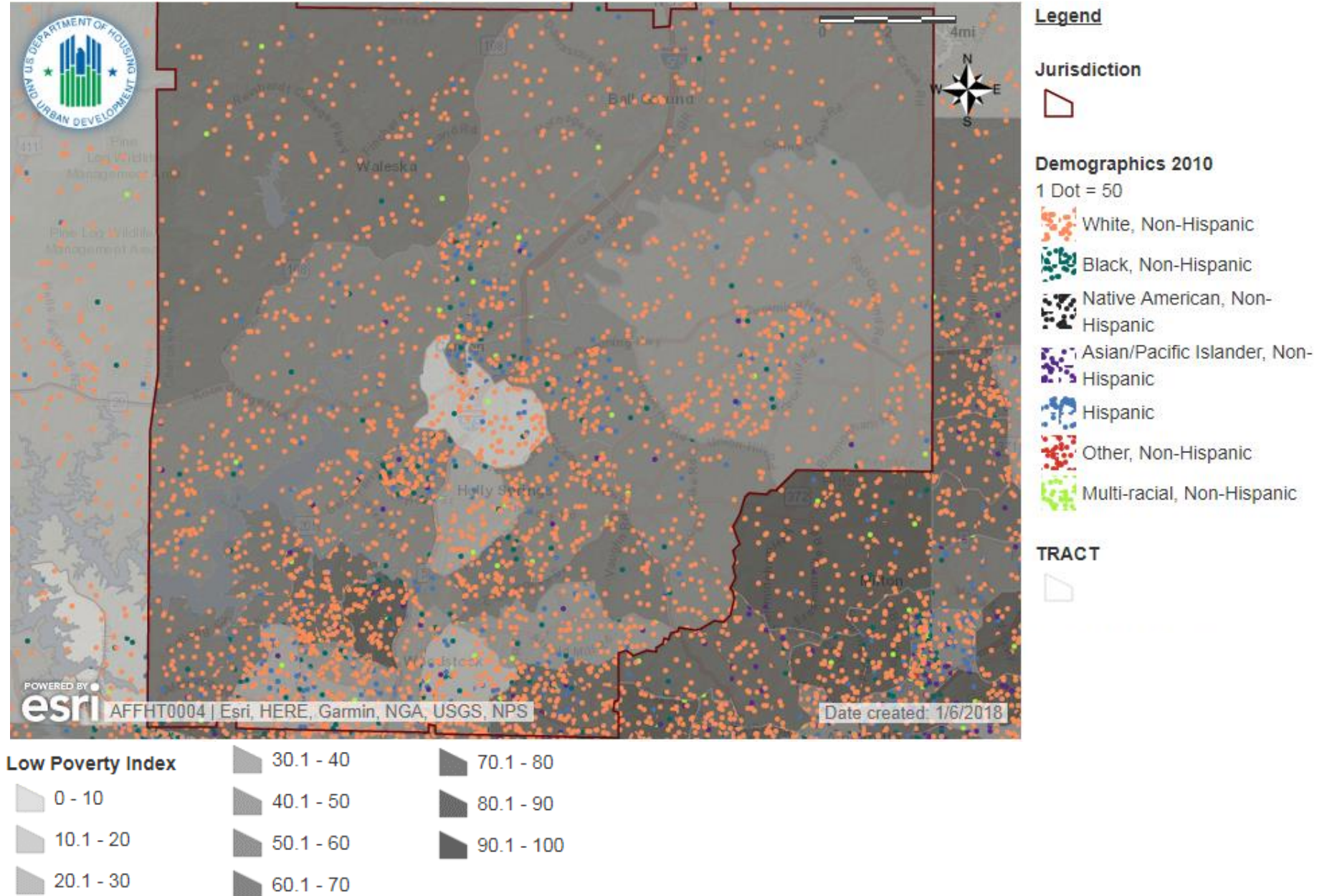


Figure 24. Low Poverty Index and National Origin in Cherokee County

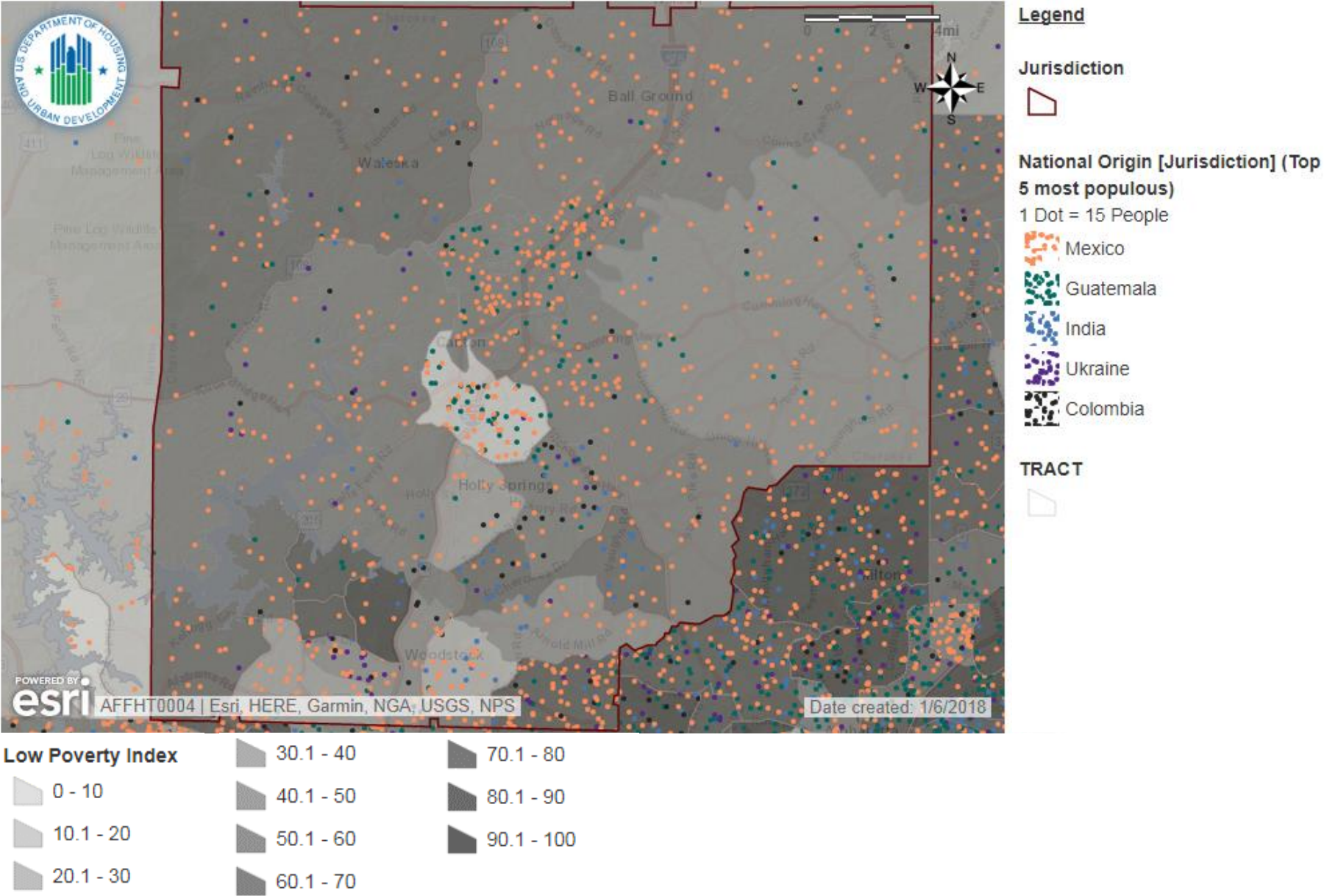
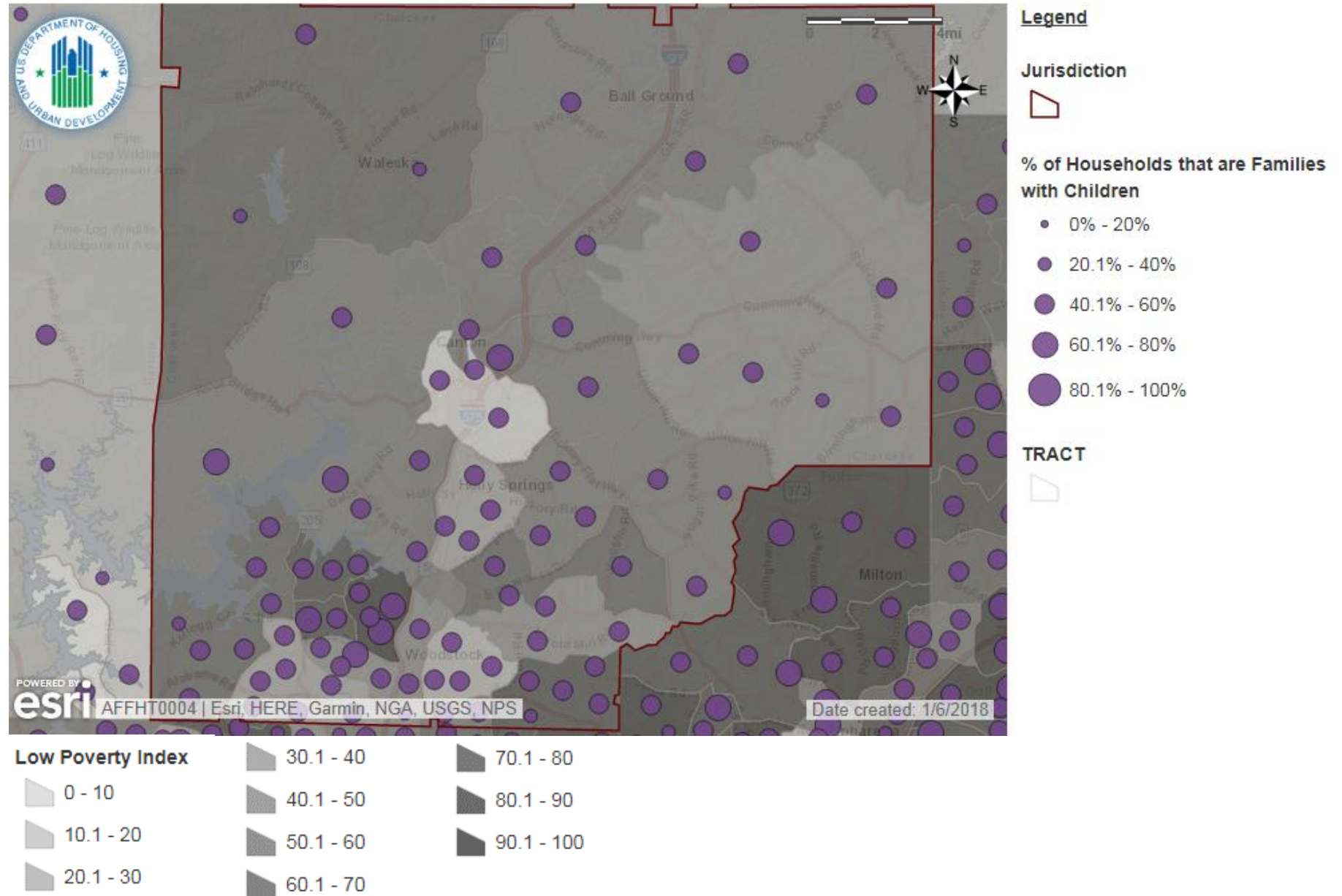


Figure 25. Low Poverty Index and Households with Children in Cherokee County



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.

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

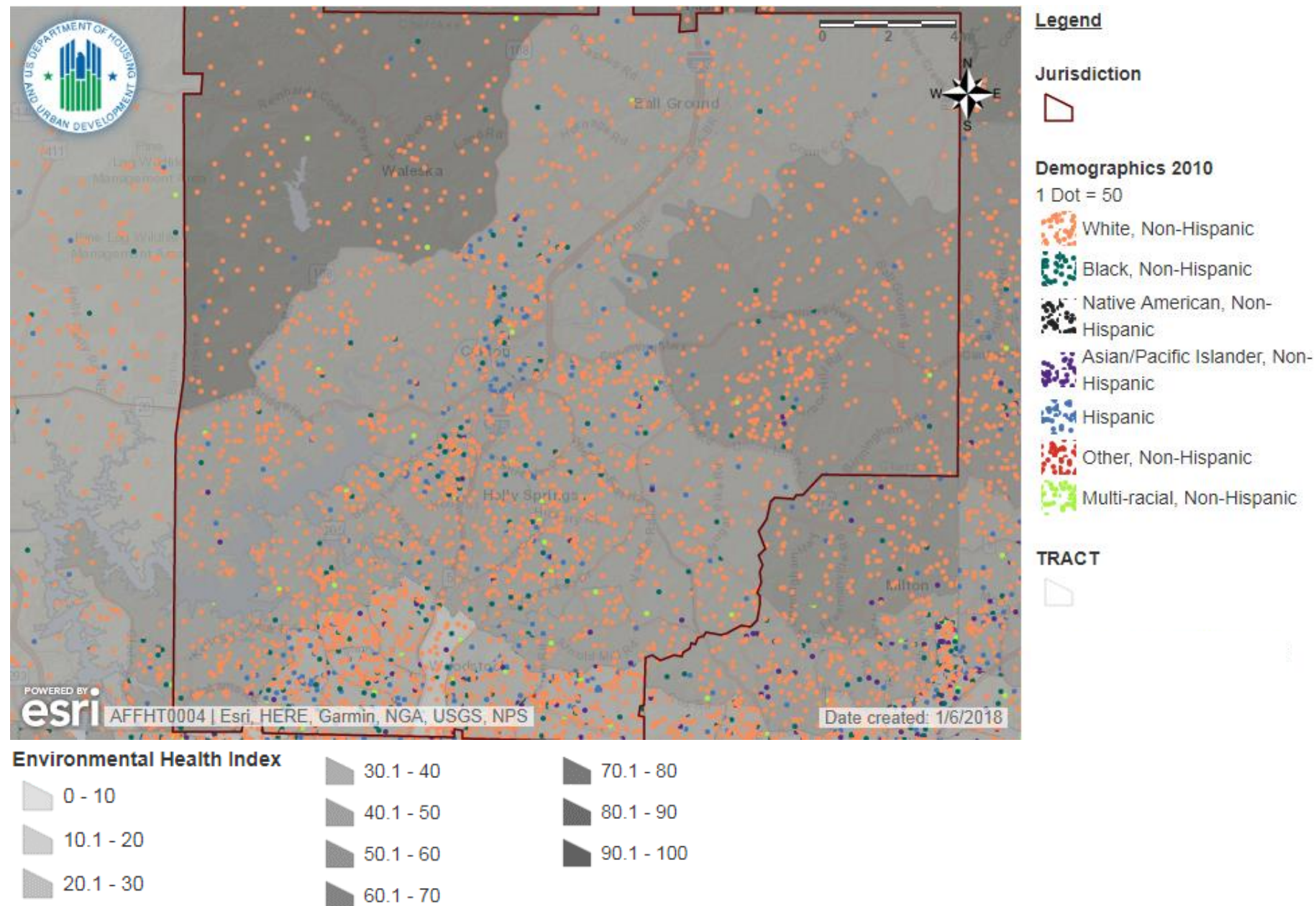


Figure 27. Environmental Health Index and National Origin in Cherokee County

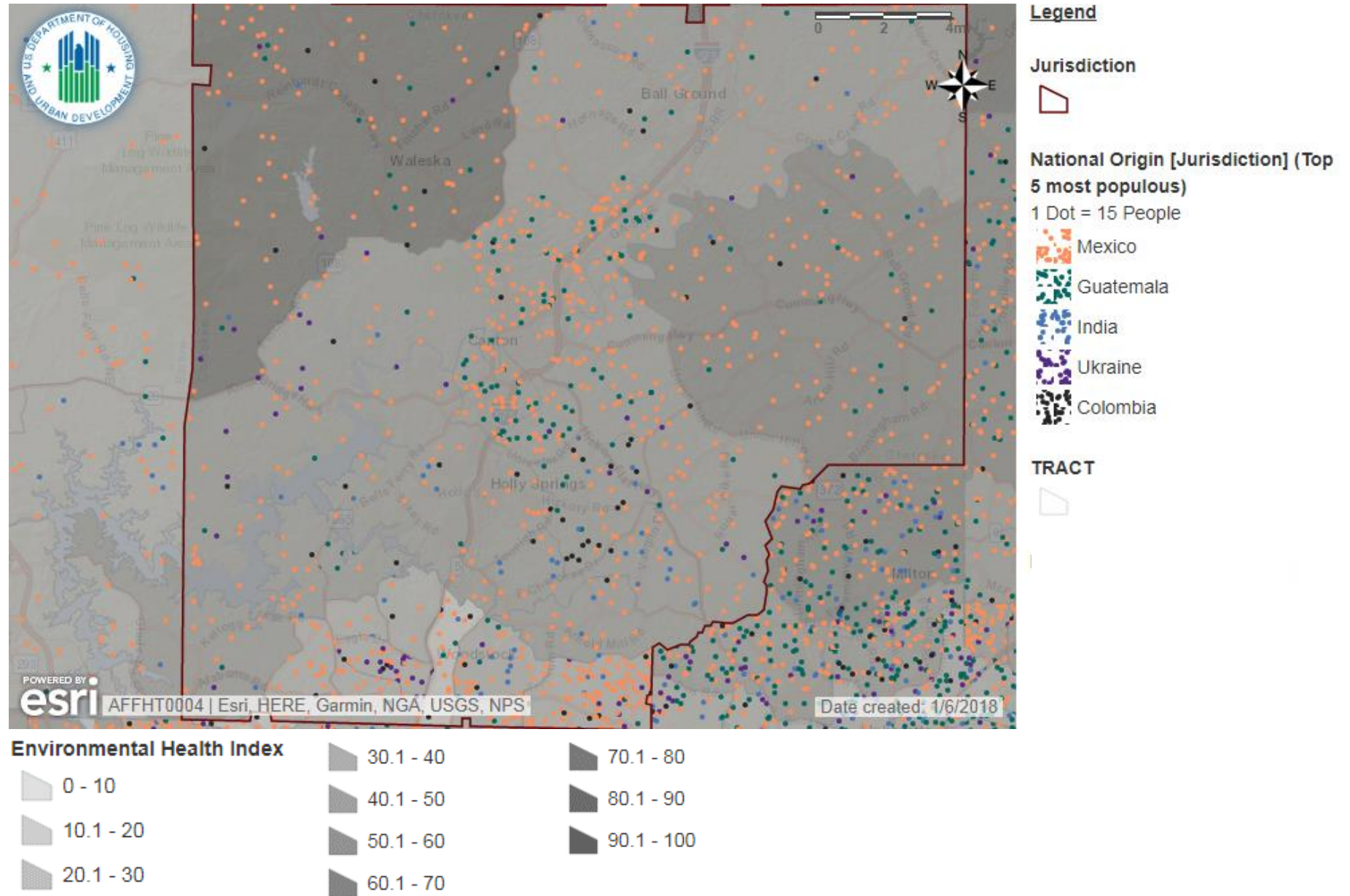
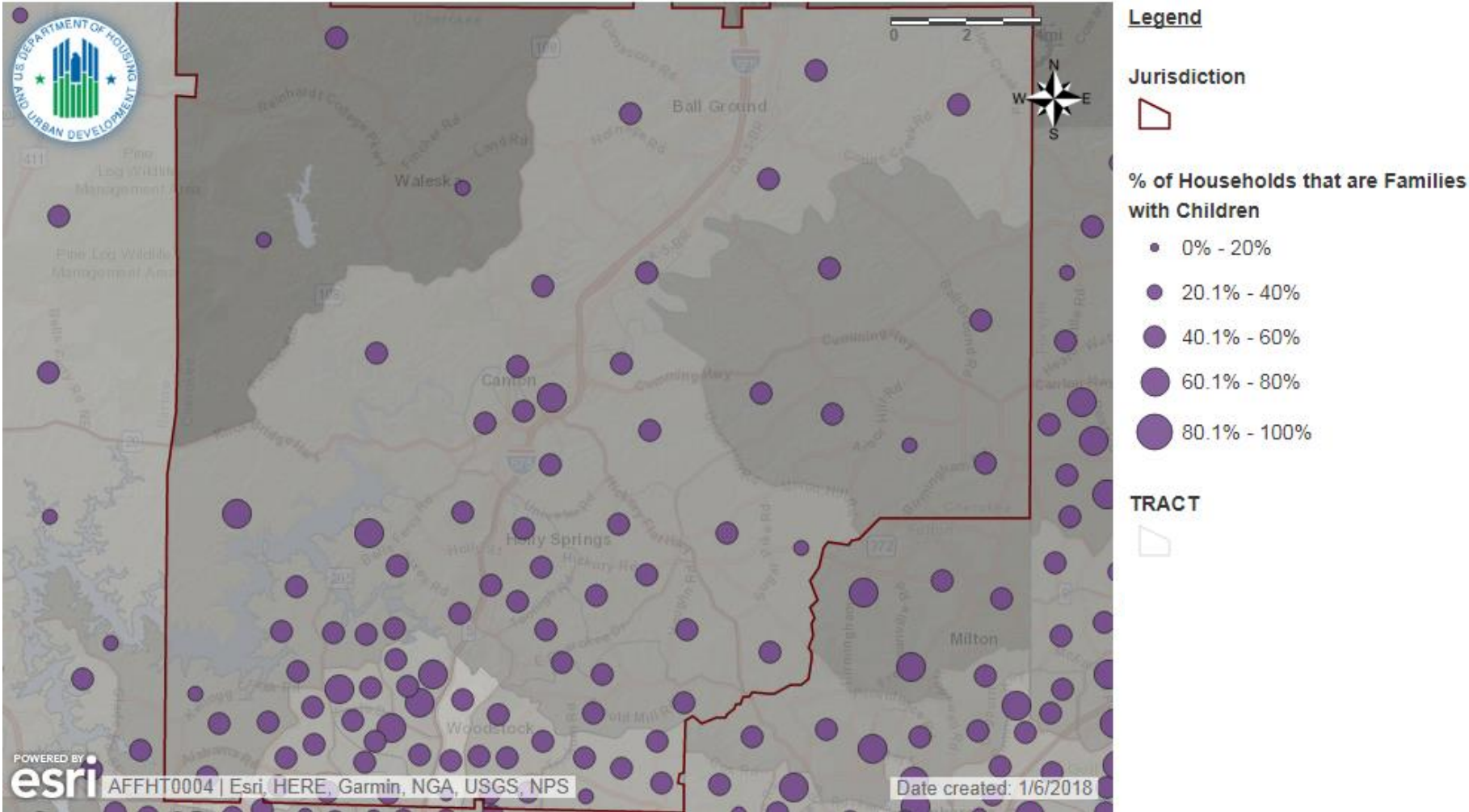


Figure 28. Environmental Health Index and Households with Children in Cherokee County



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. Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	Cherokee County			Atlanta-Sandy Springs-Roswell Region		
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with 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

Households with Severe Housing Cost Burden	Cherokee County			Atlanta-Sandy Springs-Roswell Region		
	# 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.

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

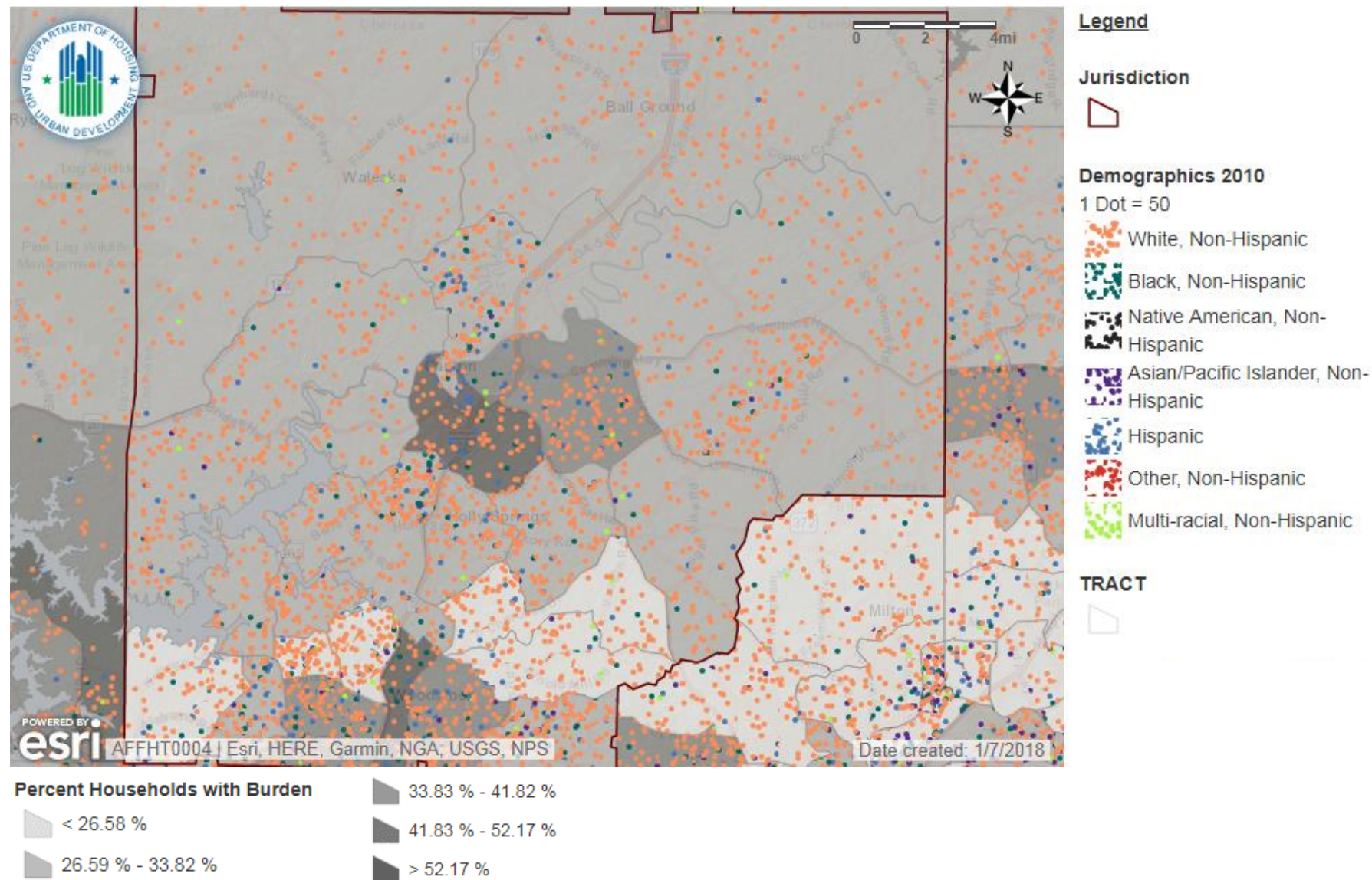
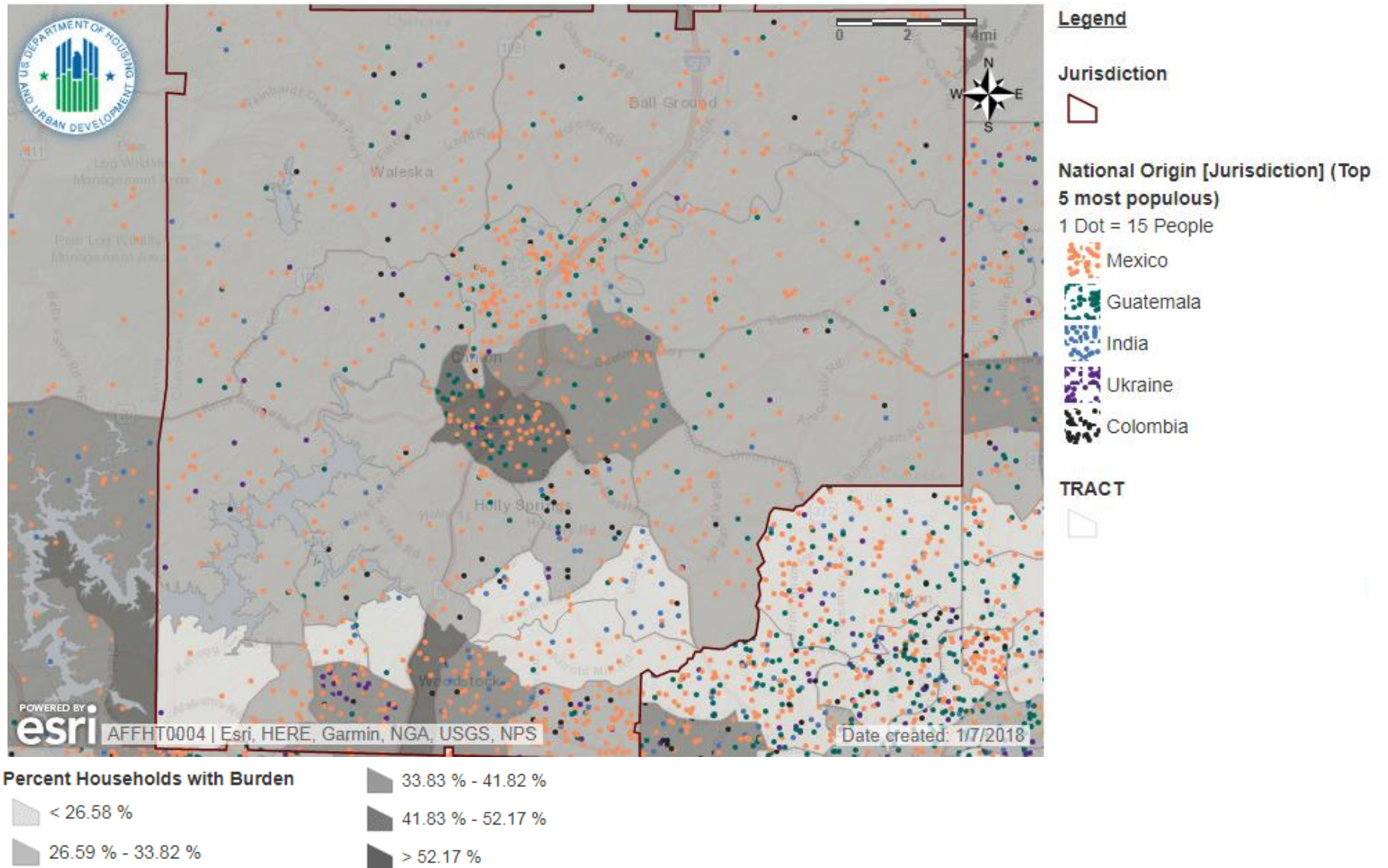


Figure 30. Housing Burdens and National Origin in Cherokee County



- 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	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
	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								
Race/Ethnicity	Cherokee County				Atlanta-Sandy Springs-Roswell Region			
	Owners		Renters		Owners		Renters	
	#	%	#	%	#	%	#	%
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	#	%
	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 11. Publicly Supported Housing Residents by Race/Ethnicity								
Housing Type	Race/Ethnicity							
	White		Black		Hispanic		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-Roswell Region								
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
Cherokee County								
Public Housing								
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 Section 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 Multifamily 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								
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

Development Name	Cherokee County					
	# Units	% White	% Black	% Hispanic	% Asian	% Households with Children
Public Housing						
Oakside Drive Apartments	142	70%	16%	12%	1%	52%
Project-Based Section 8 Housing						
Colbert Square	70	87%	4%	7%	N/a	N/a
Other HUD Multifamily Assisted Housing						
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.

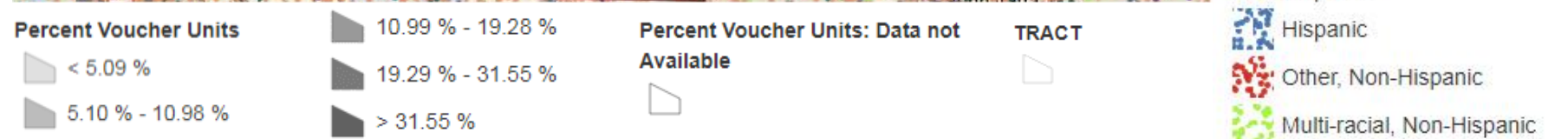
Data Sources: APSH

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.

The map displays the Ball Ground, GA area, highlighting the Pine Log Wildlife Management Area (WMA) in a light green color. The WMA is situated near the town of Waleska, GA. Major roads shown include US-198, GA-575, and GA-372. Other towns visible are Cherokee, Ball Ground, and Milton. The map includes a scale bar (0 to 2 miles), a north arrow, and a legend for the WMA. The map is powered by Esri, HERE, Garmin, NGA, USGS, and NPS. The date created is 1/6/2018.



- 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



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

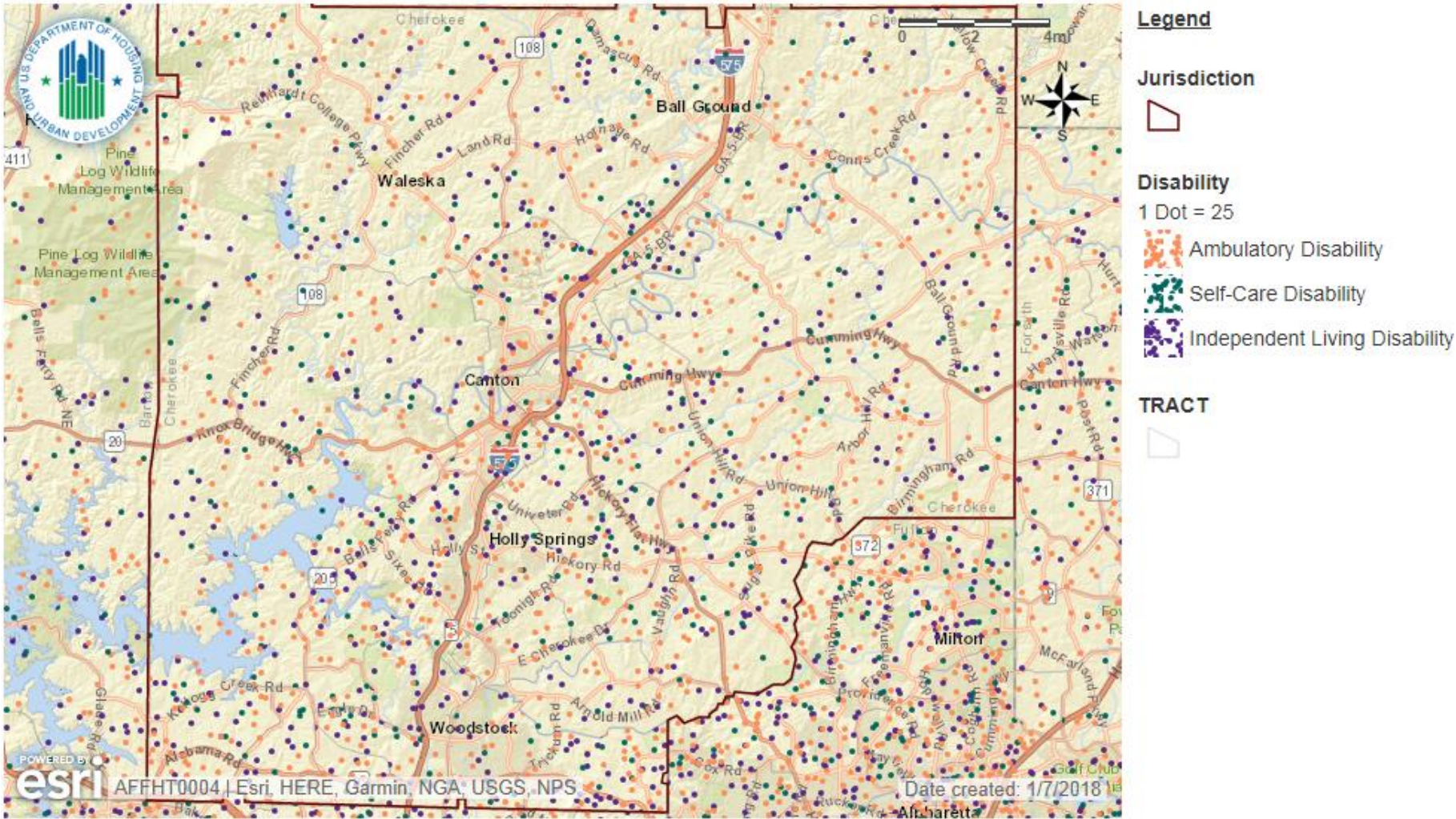
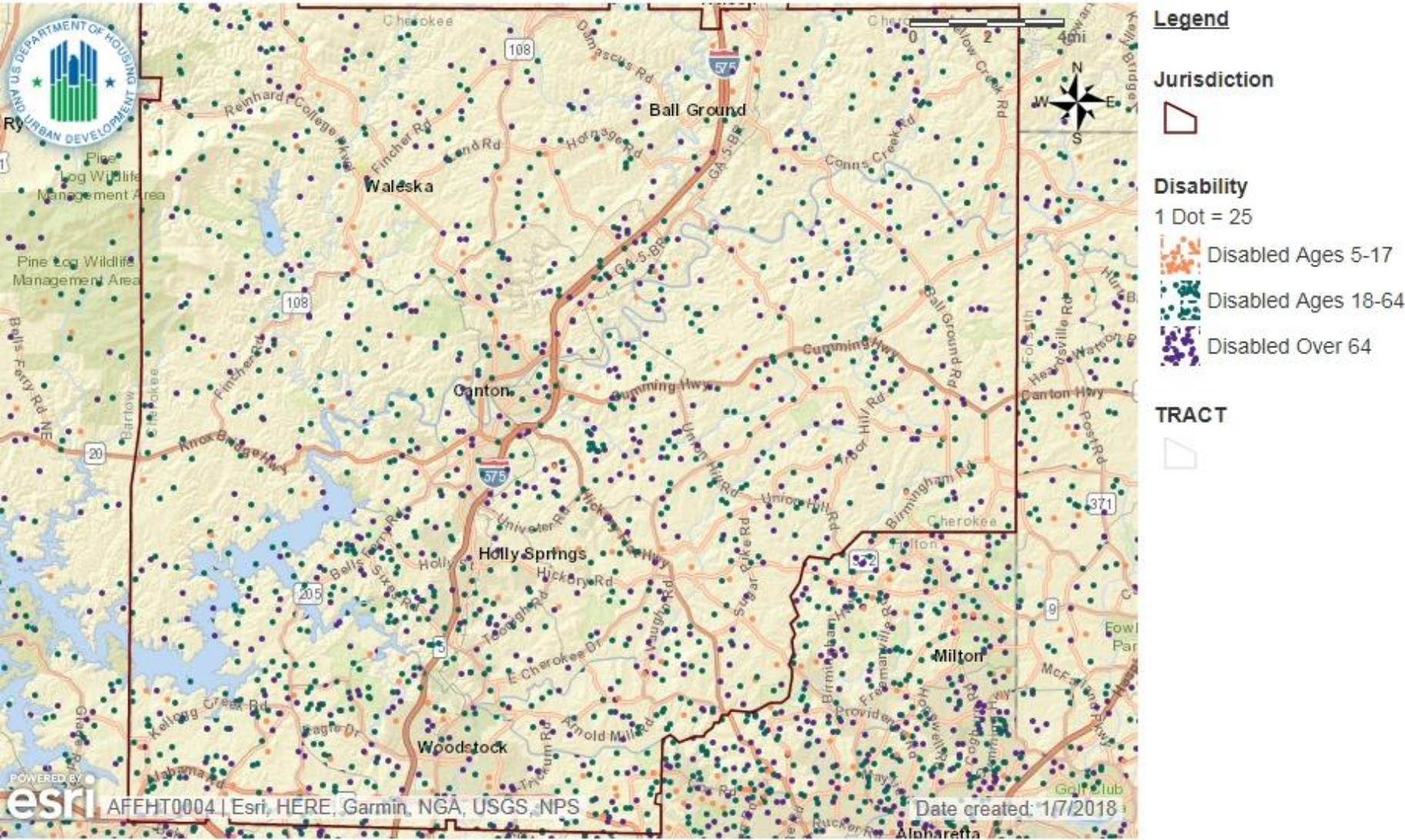


Figure 34. Persons with a Disability by Age in Cherokee County



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				
Housing Type	People with a Disability			
	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 GCEO 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; Non-compliance with design and construction requirements (handicap); Failure to provide accessible and usable public and common user areas; Other non-compliance 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 Housing 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 style="list-style-type: none"> • Availability of affordable units throughout the county • Continued need for community revitalization • Private discrimination 	<ul style="list-style-type: none"> • Community opposition • Lack of regional cooperation • Availability, type, frequency, and reliability of public transportation
Racially/ Ethnically Concentrated Areas of Poverty	<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Not applicable
Disparities in Access to Opportunity	<ul style="list-style-type: none"> • Availability of affordable units throughout the county • Need for employment skills training 	<ul style="list-style-type: none"> • Availability, type, frequency, and reliability of public transportation
Disproportionate Housing Needs	<ul style="list-style-type: none"> • Availability of affordable units throughout the county • Deteriorated and abandoned property • Homeownership gap 	<ul style="list-style-type: none"> • Lack of affordable, integrated housing for individuals who need supportive services
Publicly Supported Housing Location and Occupancy	<ul style="list-style-type: none"> • Source of income discrimination 	<ul style="list-style-type: none"> • Community opposition

Disability and Access Issues	<ul style="list-style-type: none"> • Lack of affordable, accessible housing in range of unit sizes • Land use and zoning laws 	<ul style="list-style-type: none"> • 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
Fair Housing Enforcement, Outreach Capacity, and Resources	<ul style="list-style-type: none"> • Lack of resources for fair housing agencies and organizations 	<ul style="list-style-type: none"> • Lack of state or local fair housing laws • Lack of local private fair housing outreach and enforcement • Lack of local public fair housing enforcement

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 style="list-style-type: none"> • Availability of affordable units throughout the county • Homeownership gap • Source of income discrimination 	<ul style="list-style-type: none"> • Segregation/Integration • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing Location and Occupancy 	<ul style="list-style-type: none"> • Support feasible Low Income Housing Tax Credit applications through letters of endorsement or investment of CDBG funds • Contact affordable housing developers working in the Atlanta area to promote LIHTC opportunities in Cherokee County • Conduct outreach to encourage private sector landlords, including those in high opportunity areas and accessible via CATS, to participate in the HCV program • Continue work with Habitat for Humanity and other local partners to increase homeownership opportunities and downpayment assistance for qualified households. • Explore opportunities to fund a Tenant-Based Rental Assistance (TBRA) program to assist low income households in securing housing
<p>Discussion: 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.</p>			
2. Expand access to opportunity in low and moderate income areas	<ul style="list-style-type: none"> • Continued need for community revitalization • Need for employment skills training 	<ul style="list-style-type: none"> • Segregation/Integration • Disparities in Access to Opportunity 	<ul style="list-style-type: none"> • Continue making needed infrastructure improvements in low and moderate income areas • Provide funding for employment skills training and job search assistance through a qualified local organization

			<ul style="list-style-type: none"> Continue using CDBG funds to assist local organizations in expanding access to opportunity (e.g., education, transportation, and healthcare) for low and moderate income households
<p>Discussion: 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 organizations that expand access to opportunity factors such as extracurricular educational activities, healthcare access, and job skills training.</p>			
3. Address substandard housing	<ul style="list-style-type: none"> Deteriorated and abandoned property 	<ul style="list-style-type: none"> Disproportionate Housing Needs 	<ul style="list-style-type: none"> Identify areas of the county in need of enhanced code enforcement efforts to address substandard and deteriorated housing Provide funding to assist low and moderate income homeowners make needed home repairs
<p>Discussion: 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.</p>			
4. Increase accessible housing options for people with disabilities	<ul style="list-style-type: none"> Lack of affordable, accessible housing in range of unit sizes Land use and zoning laws 	<ul style="list-style-type: none"> Disability and Access Issues 	<ul style="list-style-type: none"> Amend the Zoning Ordinance to clarify the requirement that residents of personal care homes be ambulatory and to remove the minimum spacing requirement Adopt a reasonable accommodation ordinance outlining the process by which persons with disabilities may request accommodations to zoning, land use, and other regulatory requirements Continue the Volunteer Aging Council work in making home modifications for seniors and persons with disabilities

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	<ul style="list-style-type: none"> • Private discrimination • Lack of resources for fair housing agencies and organizations 	<ul style="list-style-type: none"> • Fair Housing Outreach, Enforcement Capacity, and Resources 	<ul style="list-style-type: none"> • 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.
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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 11th, 2017, 4:00 PM
Next Step Ministries, Inc.
7709 Turner Road
Woodstock, GA 30188

Meeting 2

Tuesday, December 12th, 2017, 10:30 AM
111 Brown Industrial Parkway
Canton, GA 30114

Meeting 3

Wednesday, December 13th, 2017 1:00 PM
1001 Univeter Road
Canton, GA 30115

The survey is available online at www.surveymonkey.com/r/CherokeeAFH 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 <http://www.cherokeega.com/CDBG> 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.

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MOSAIC
COMMUNITY PLANNING



YOU'RE INVITED - PLEASE JOIN US!

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

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The Cherokee County CDBG Program Office is completing an Assessment of Fair Housing that will identify any barriers to housing choice due to race, ethnicity, national origin, religion, sex, disability, or whether a household has children. It will also discuss segregation and poverty, access to opportunity, and special housing needs in the county. The community's opinions and perceptions are an important part, and everyone is invited to give input.



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

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- 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

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Tuesday, December 12
10:30 a.m.

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Canton, GA 30114

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1:00 p.m.

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MOSAIC
COMMUNITY PLANNING



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

<p>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	<p>common space, meals, and household responsibilities, and/or leaves maximum occupancy per dwelling as a matter of safety regulated by the building code rather than the zoning regulations.</p> <p>The term "family" does not include any organization or institutional group, which could be read to exclude a group of unrelated individuals with disabilities residing together in a licensed personal care home. However, whereas a conventional single-family dwelling permits a group of not more than 4 unrelated individuals, the personal care regulations permit up to 6 unrelated individuals. See Issue 2 below.</p>		<p>permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state Due Process and/or the federal FHA as it may have a disproportionate impact on people with disabilities, minorities, and families with children. Another option is to amend the ordinance to add an administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family.</p>
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p>	<p>A small personal care home (or community living arrangement) may house up to six “ambulatory” residents. A small personal care home is permitted in the AG and all residential districts. While allowing six residents per dwelling is more</p>	<p>3</p>	<p>See Sec. 4.3 (definition of personal care home); 7.7-17 (permitted uses additional requirements).</p> <p><i>Personal care home.</i> “A licensed home where residents are provided with housing, meals and 24 hours per day assistance with</p>

<p>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?</p>	<p>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.</p>		<p>essential activities of daily living, such as bathing, grooming, dressing, etc. but no medical or nursing care is provided."</p>
<p>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?</p>	<p>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</p>	<p>2</p>	<p>See Table 14.1 and 14.2; Sec. 15.14(B) (variance process).</p> <p>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</p>

<p>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?</p>	<p>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.</p> <p>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</p>	<p>indicates the process of seeking amendments of zoning ordinance and application for special use permit.</p> <p>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.</p>
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	threats to safety may impact the outcome.		
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	Yes, in all residential districts where a small personal care home (of up to six residents) may be sited, no home may be operated within 1,000 feet of any other residential care facility. No legislative or governmental justification for the spacing is included in the ordinance.	3	<i>See</i> Sec. 7.7-17(a)(5). Spacing requirements for protected classes such as persons with disabilities are generally inconsistent with the FHA, unless the jurisdiction could make a showing that the ordinance was passed to protect a compelling governmental interest (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.
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<p>5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?</p>	<p>Besides the broad category of “personal care home,” the substantive provisions 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</p>	<p>2</p>	<p><i>See</i> Table 7.2 (Permitted Use Table); Sec. 7.7-17(a).</p>
<p>6. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot</p>	<p>The zoning ordinance contemplates various housing types including single-family, single-family attached (duplex, triplex,</p>	<p>2</p>	<p><i>See</i> Sec. 7.1 et seq.; Table 7.1 (Minimum District Development Standards); Sec. 8.1 et seq. (Traditional Neighborhood</p>

<p>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)?</p>	<p>quadplex), townhomes, multifamily, manufactured, and mixed-use. However, there are 8 single-family districts (plus the AG district) which only permit single-family 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. ft. 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</p>		<p>Development); Sec. 23.1 et seq. (Conservation Design Community).</p> <p>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.</p>
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	<p>developments are permitted in the R-A district, with a minimum site area of 2 acres and maximum units per acre not exceeding 8.</p> <p>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.</p> <p>Overall, these development standards may unreasonably affect the feasibility of developing affordable single family detached and attached housing within the jurisdiction.</p>		
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<p>7a. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?</p> <p>7b. Do multi-family districts restrict development only to low-density housing types?</p>	<p>Multifamily housing is permitted by right in the RM-10 district with a maximum density of 10 u/a and the RM-16 district with a maximum density of 16 u/a. Both of these 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 adequate number of units of affordable multifamily housing.</p>	<p>2</p>	<p><i>See Sec. 7.1 et seq.; Table 7.1 (Minimum District Development Standards); Sec. 8.1 et seq. (Traditional Neighborhood Development).</i></p>
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<p>8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?</p>	<p>“Guest houses” as an accessory structure are allowed in the AG and all residential districts. The regulations do not specify, however, whether a guest house may or may not be rented to another individual or family. Single-wide manufactured homes are permitted in the AG district on a minimum lot of 2 acres. Otherwise manufactured homes also are permitted in the R-80, R-60, R-40, R-A, and RTH districts where additional regulations are met.</p>	<p>1</p>	<p><i>See</i> Sec. 5.6-11 (guest house); 7.7-1 (manufactured housing).</p> <p>There is opportunity to expand accessory dwelling units as an expressly permitted alternative and low-impact form of affordable housing, especially in low density areas where large lot sizes would easily accommodate accessory dwellings and additional off-street parking.</p>
<p>9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?</p>	<p>The County follows the State Minimum Standard Codes, O.C.G.A. § 8-2-20(9), which currently 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</p>	<p>1</p>	<p><i>See</i> Code of Ordinances Sec. 14-1 et seq.</p>

<p>9b. Is there any provision for monitoring compliance?</p>	<p>requirements. In addition, Chapter 11 of the 2012 IBC requires that buildings and facilities comply with the accessibility requirements of <i>ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities</i> standard, which is a nationally recognized standard for making buildings accessible.</p> <p>The County's Building Department is authorized to administer and enforce the construction codes as required by state law.</p>		
<p>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?</p>	<p>The zoning ordinance does not expressly provide density bonuses or incentives for the development of affordable or low-income 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.</p>	<p>2</p>	<p>See Code of Ordinances Sec. 32-35(q)(2)(d).</p> <p>"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..."</p>

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.

Cherokee County Fair Housing Survey

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

Cherokee County Fair Housing Survey

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. What is your total household income?

- | | |
|--|--|
| <input type="radio"/> Less than \$10,000 | <input type="radio"/> \$35,000 to \$49,999 |
| <input type="radio"/> \$10,000 to \$14,999 | <input type="radio"/> \$50,000 to \$74,999 |
| <input type="radio"/> \$15,000 to \$24,999 | <input type="radio"/> \$75,000 to \$99,999 |
| <input type="radio"/> \$25,000 to \$34,999 | <input type="radio"/> \$100,000 and above |

4. What is your race/ethnicity?

- | | |
|---|--|
| <input type="radio"/> White | <input type="radio"/> Asian or Pacific Islander |
| <input type="radio"/> African American or Black | <input type="radio"/> Native American or Alaska Native |
| <input type="radio"/> Latino or Hispanic | <input type="radio"/> Multiple races |
| <input type="radio"/> Other (please list): | |

5. Does anyone in your home regularly speak a language other than English?

- ☐ No
- ☐ Yes, please list the language:

6. Does anyone in your home have a disability?

- ☐ No
- ☐ Yes

7. What is your current housing status?

- | | |
|---|--|
| <input type="radio"/> I own a home | <input type="radio"/> I am homeless |
| <input type="radio"/> I rent a home | <input type="radio"/> I live with a relative |
| <input type="radio"/> I live in a hotel/motel | |
| <input type="radio"/> Other (please list): | |

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

- ☐ No
- ☐ Yes

Cherokee County Fair Housing Survey

About Your Neighborhood

9. How satisfied are you with the neighborhood where you live?

- ☐ Very satisfied ☐ Not very satisfied
- ☐ Somewhat satisfied ☐ Not at all satisfied

10. What do you like best about your neighborhood?

11. What improvements would you like to see?

12. Is there another area in Cherokee County where you would like to move?

- ☐ No
- ☐ Yes, please list where and why you would choose that area:

13. In your neighborhood, do you have access to the following community resources?

	Yes	Somewhat	No	I don't know
Quality public schools	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reliable bus service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Areas with jobs you could get	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Places to shop and bank	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing that you can afford	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing that is in good condition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parks and trails	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clean environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Cherokee County Fair Housing Survey

About Cherokee County

14. 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
Housing for people with disabilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing for seniors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing that people with lower incomes can afford	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing that accepts Section 8 vouchers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apartments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
First time homebuyer assistance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please share any other comments about local housing needs:

15. 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
Schools	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bus service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Roads and sidewalks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Grocery stores and other shopping	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Banking and lending	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parks and trails	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Property maintenance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Garbage collection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Police and fire protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Cherokee County Fair Housing Survey

Fair Housing Rights

16. Do you understand your fair housing rights?

- ☐ Yes
- ☐ Somewhat
- ☐ 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)

- | | |
|---|--|
| <input type="checkbox"/> Landlord or property manager | <input type="checkbox"/> Mortgage lender |
| <input type="checkbox"/> Real estate agent | <input type="checkbox"/> City or county staff person |
| <input type="checkbox"/> Other (please list): | |

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

- | | |
|--|---|
| <input type="checkbox"/> Race | <input type="checkbox"/> Sex |
| <input type="checkbox"/> Ethnicity | <input type="checkbox"/> Disability |
| <input type="checkbox"/> National origin | <input type="checkbox"/> Familial status (single parent with children, family with children, expecting a child) |
| <input type="checkbox"/> Religion | |

21. Did you file a report of that discrimination?

- ☐ Yes
- ☐ No

22. If you answered NO, why didn't you file?

- | | |
|--|--|
| <input type="checkbox"/> I didn't know what good it would do | <input type="checkbox"/> I was afraid of retaliation |
| <input type="checkbox"/> I didn't know where to file | <input type="checkbox"/> The process wasn't in my language |
| <input type="checkbox"/> I didn't have time to file | <input type="checkbox"/> The process wasn't accessible to me because of a disability |
| <input type="checkbox"/> I didn't know it was a violation of the law | |
| <input type="checkbox"/> Other, please list: | |

Cherokee County Fair Housing Survey

Barriers to Fair Housing

23. Do you think housing discrimination is an issue in Cherokee County?

- ☐ Yes, housing discrimination is an issue
- ☐ Housing discrimination may be an issue
- ☐ No, housing discrimination is not an issue
- ☐ I don't know if housing discrimination is an issue

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

- ☐ Admission and occupancy policies in public housing
- ☐ Community opposition to affordable housing
- ☐ Discrimination by landlords or rental agents
- ☐ Discrimination by mortgage lenders
- ☐ Discrimination or steering by real estate agents
- ☐ Displacement of residents due to rising housing costs
- ☐ Lack of housing options for people with disabilities
- ☐ Landlords refusing to accept vouchers
- ☐ Limited access to banking and financial services
- ☐ Limited access to jobs
- ☐ Limited access to good schools
- ☐ Limited access to community resources for people with disabilities
- ☐ Neighborhoods that need revitalization and new investment
- ☐ Not enough affordable rental housing for large families
- ☐ Other (please list):

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

2. ¿Cuál grupo de edad le pertenece a usted?

- | | |
|-----------------------------------|-----------------------------|
| <input type="radio"/> Menos de 18 | <input type="radio"/> 45-54 |
| <input type="radio"/> 18-24 | <input type="radio"/> 55-61 |
| <input type="radio"/> 25-34 | <input type="radio"/> 62-74 |
| <input type="radio"/> 35-44 | <input type="radio"/> 75+ |

3. ¿Cuál es su ingreso total del hogar?

- | | |
|---|---|
| <input type="radio"/> Menos de \$10,000 | <input type="radio"/> \$35,000 - \$49,999 |
| <input type="radio"/> \$10,000 - \$14,999 | <input type="radio"/> \$50,000 - \$74,999 |
| <input type="radio"/> \$15,000 - \$24,999 | <input type="radio"/> \$75,000 - \$99,999 |
| <input type="radio"/> \$25,000 - \$34,999 | <input type="radio"/> \$100,000 o más |

4. ¿Cuál es su raza/etnia?

- | | |
|--|--|
| <input type="radio"/> Blanca | <input type="radio"/> Asiático o Isleños del Pacífico |
| <input type="radio"/> Afro Americano o Negro | <input type="radio"/> Indios Americano o Natural de Alaska |
| <input type="radio"/> Latino o Hispano | <input type="radio"/> Mas de una raza |
| <input type="radio"/> Otro (especificar): | |

5. ¿Hay otro idioma que no sea inglés hablado regularmente en su hogar?

- ☐ No
- ☐ Sí, ¿qué es el idioma?

6. ¿Hay personas en su hogar con discapacidades espéciales?

- ☐ No
- ☐ Sí

7. ¿Cuál es su situación presente de vivienda?

- ☐ 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 pública o recibe ayuda de alquiler bajo el programa Sección 8?

- ☐ No
- ☐ Sí

Encuesta de Vivienda Justa del Condado de Cherokee

Acerca de su Vecindario

9. ¿Qué tan satisfecho está con el vecindario donde vive?

- ☐ Muy satisfecho ☐ No muy satisfecho
- ☐ Un poco satisfecho ☐ Para nada satisfecho

10. ¿Qué le gusta más de su vecindario?

11. ¿Qué mejoras le gustaría ver?

12. ¿Hay alguna otra área en el condado de Cherokee adonde le gustaría mudarse?

- ☐ No
- ☐ Sí, por favor indique adónde y por qué escogería esa área:

13. ¿En su vecindario, tienen acceso a los siguientes recursos de la comunidad?

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

Encuesta de Vivienda Justa del Condado de Cherokee

Acerca del Condado de Cherokee

14. Pensando en toda el condado de Cherokee, por favor seleccione si usted piensa que se necesita más 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vivienda para adultos mayores	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vivienda que personas con menores ingresos puedan costear	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vivienda que admita vales del programa Sección 8	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apartamentos	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ayuda para los que están comprando vivienda por primera vez	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Favor enumerar otras necesidades de vivienda:

15. Pensando en toda el condado de Cherokee, por favor seleccione cada una de las cosas de la lista que usted piensa que están disponibles equitativamente, y en buen estado, en todos los vecindarios.

	Ha Beneficiado Igualmente	Ha Beneficiado Desigualmente	No Sabes
Escuelas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Servicio de autobús	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Carreteras y aceras	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supermercados y otros lugares para compras	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bancos e intituciones de crédito	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parques y veredas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recolección de basura	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mantenimiento de propiedades	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protección de policia y fuego	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
- ☐ 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 usted? (Seleccionar todo lo que corresponda)

☐ Raza

☐ Sexo

☐ Etnia

☐ Incapacidad o discapacidad

☐ Nacionalidad

☐ Situación familiar (Parientes Solteros, Familias con niños, Madres embarazadas)

☐ Religión

21. ¿Presentó una denuncia por discriminación?

☐ Sí

☐ No

22. Si usted no presentó una denuncia discriminación, ¿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 discapacidad

☐ No me di cuenta que era una violación de la ley

☐ Otro (especificar):

Encuesta de Vivienda Justa del Condado de Cherokee

Obstáculos para Obtener Vivienda Justa

23. ¿Cree usted que la discriminación en materia de vivienda es un problema en el condado de Cherokee?

☐ 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 problema

☐ No sé si la discriminación en materia de vivienda es un problema

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)

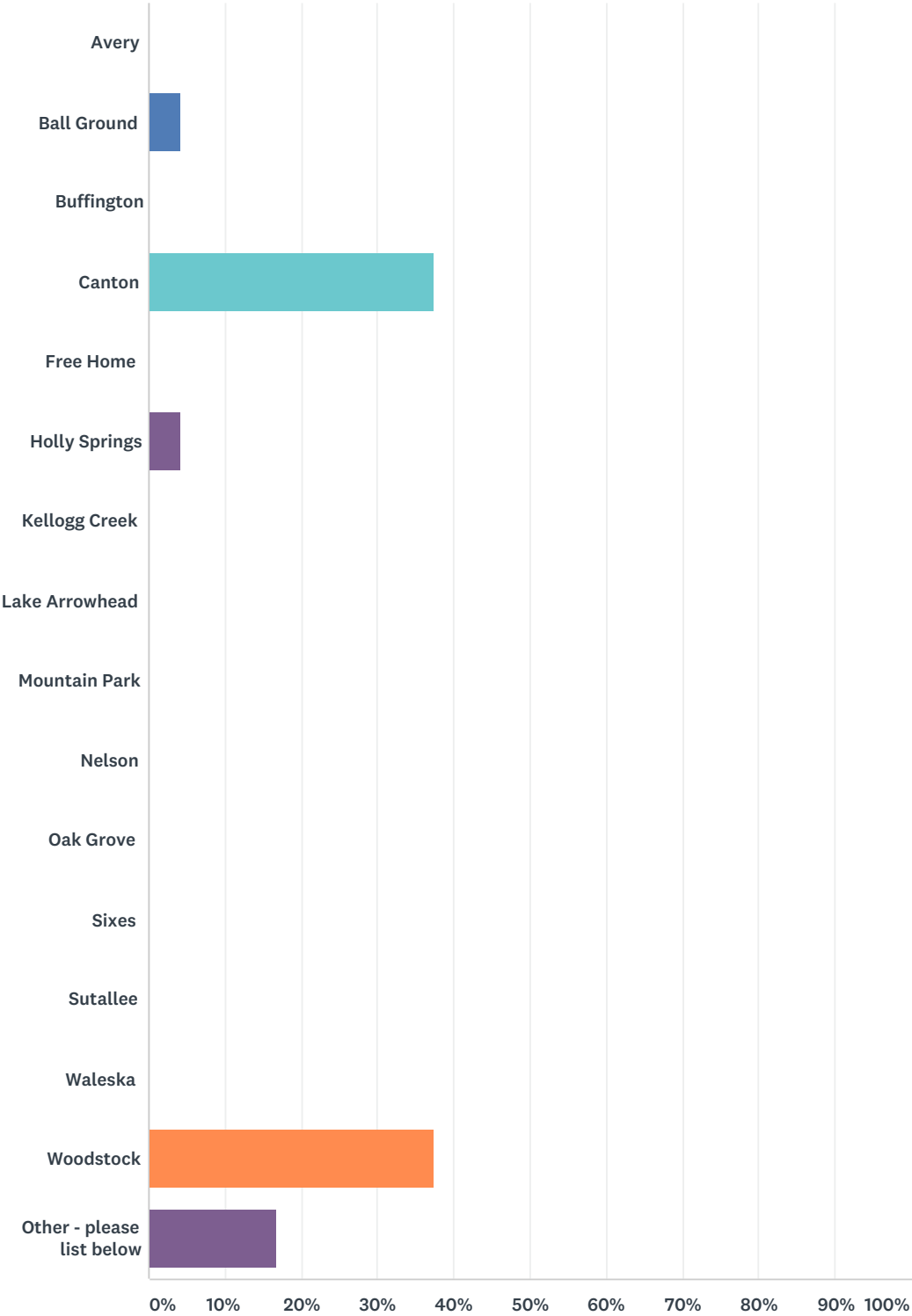
- ☐ Restricciones de admisión y alquiler en vivienda publica
- ☐ Oposición a la vivienda asequible de parte de la comunidad
- ☐ Discriminación por parte de los propietarios o agentes
- ☐ Discriminación por parte de los prestamistas
- ☐ Discriminación o dirección de parte de los agentes de bienes y raíces
- ☐ 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.

Answered: 24 Skipped: 3



ANSWER CHOICES	RESPONSES	
Avery	0.00%	0

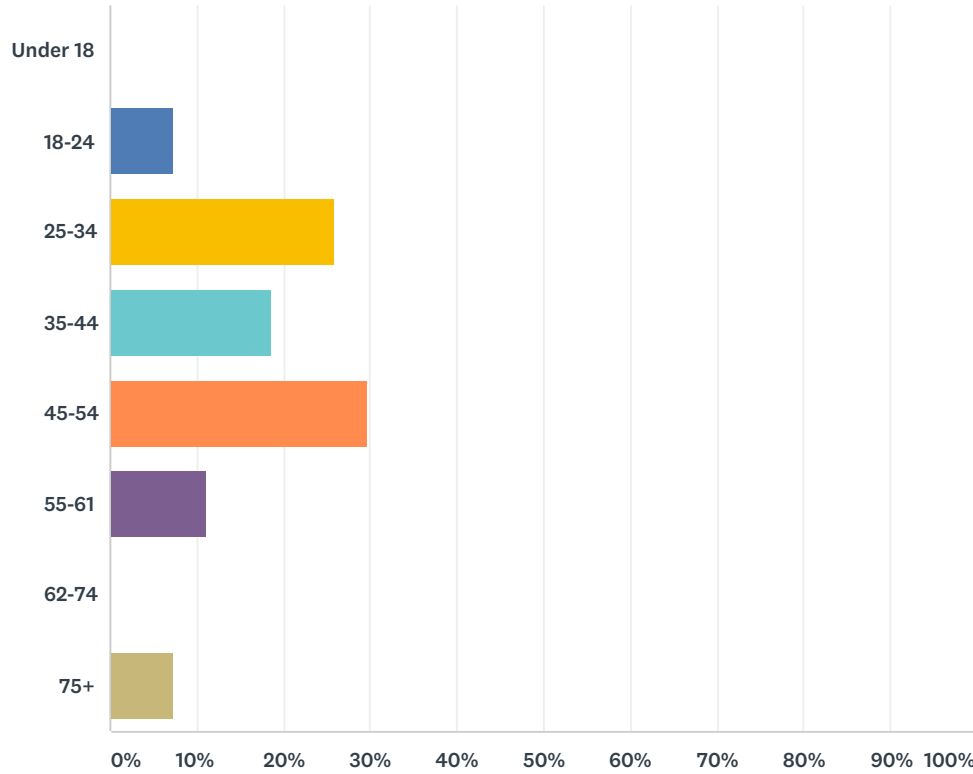
Cherokee County Fair Housing Survey

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?

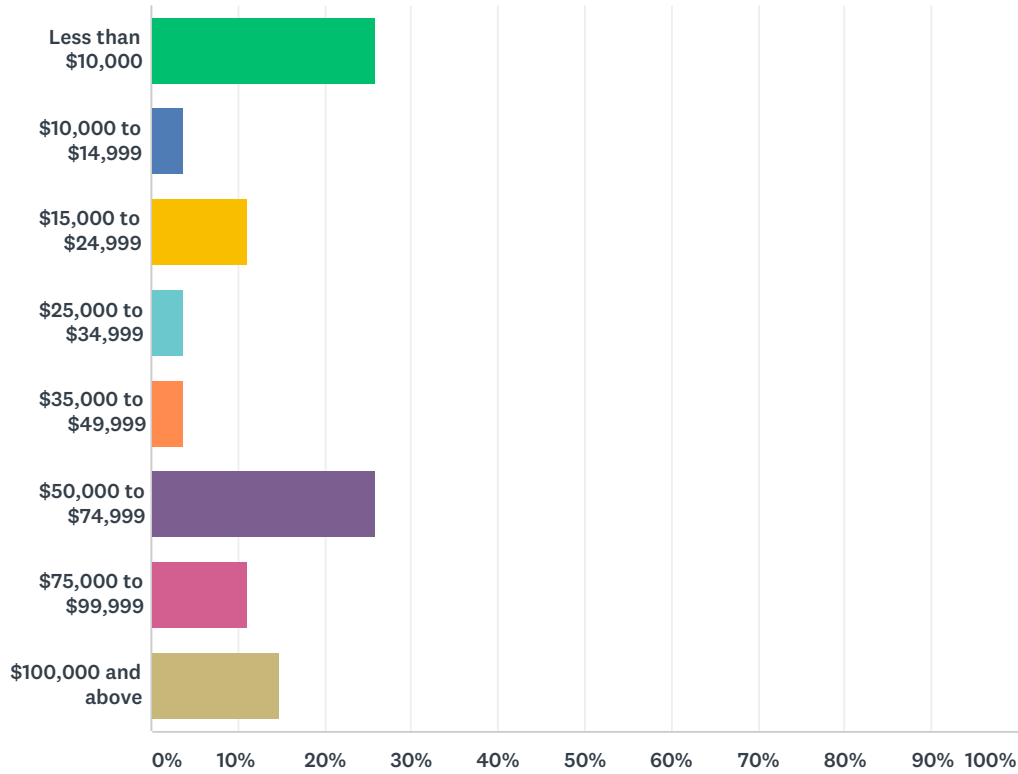
Answered: 27 Skipped: 0



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?

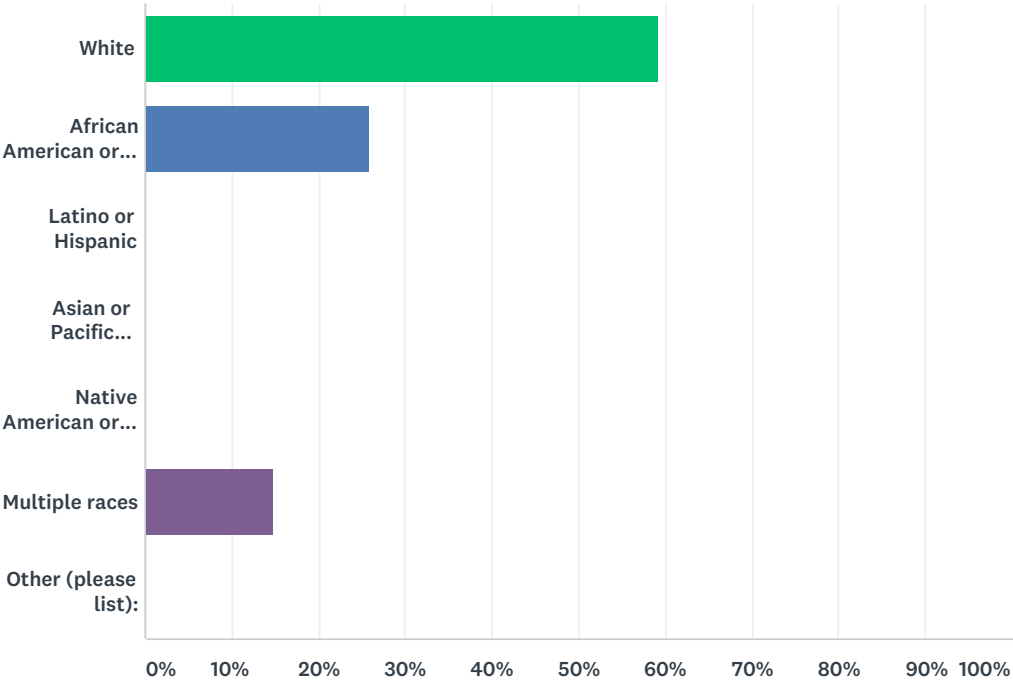
Answered: 27 Skipped: 0



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?

Answered: 27 Skipped: 0

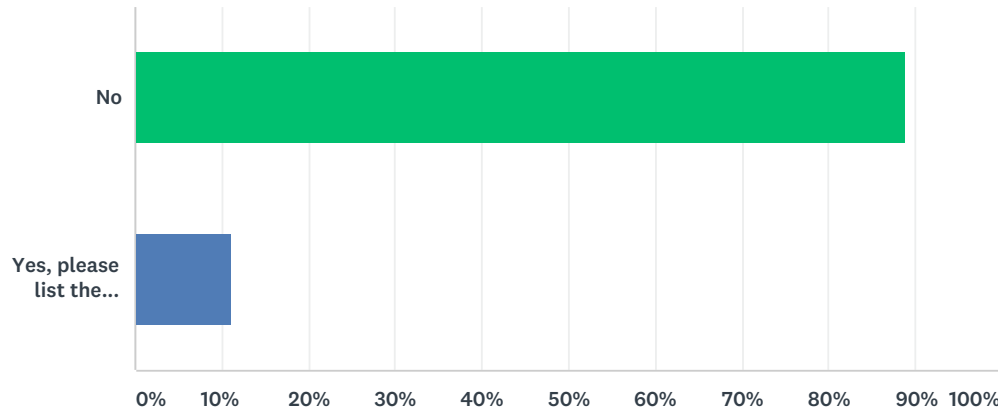


ANSWER CHOICES	RESPONSES	
White	59.26%	16
African American or Black	25.93%	7
Latino or Hispanic	0.00%	0
Asian or Pacific Islander	0.00%	0
Native American or Alaska Native	0.00%	0
Multiple races	14.81%	4
Other (please list):	0.00%	0
TOTAL		27

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

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

Answered: 27 Skipped: 0

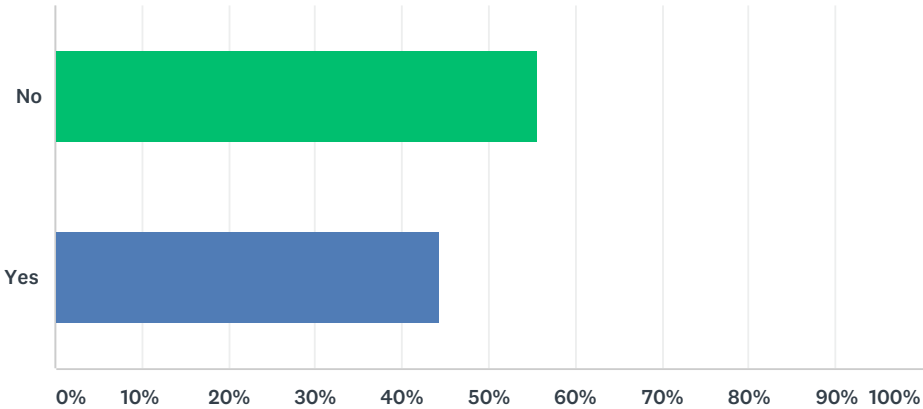


ANSWER CHOICES	RESPONSES
No	88.89% 24
Yes, please list the language:	11.11% 3
TOTAL	27

#	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?

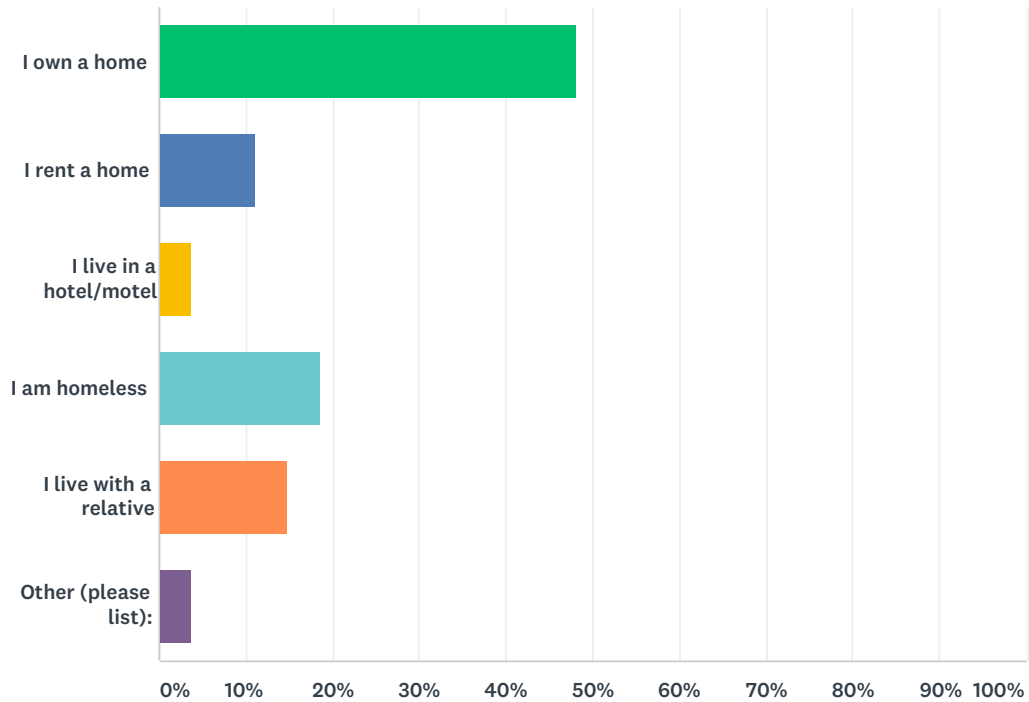
Answered: 27 Skipped: 0



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

Q7 What is your current housing status?

Answered: 27 Skipped: 0

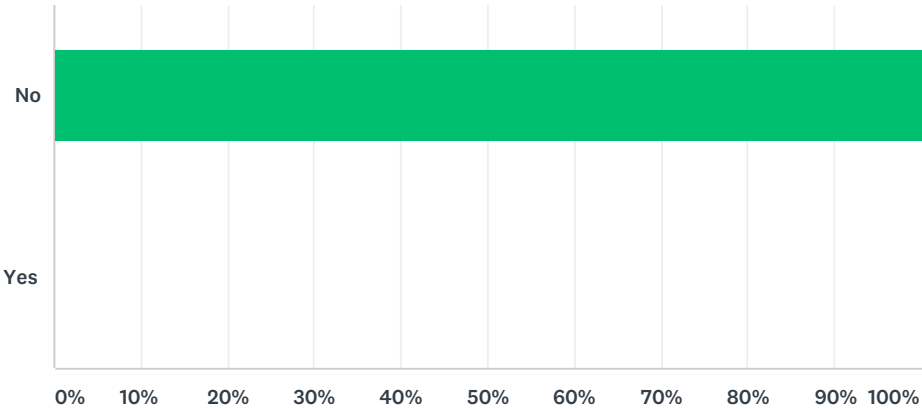


ANSWER CHOICES	RESPONSES	
I own a home	48.15%	13
I rent a home	11.11%	3
I live in a hotel/motel	3.70%	1
I am homeless	18.52%	5
I live with a relative	14.81%	4
Other (please list):	3.70%	1
TOTAL		27

#	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?

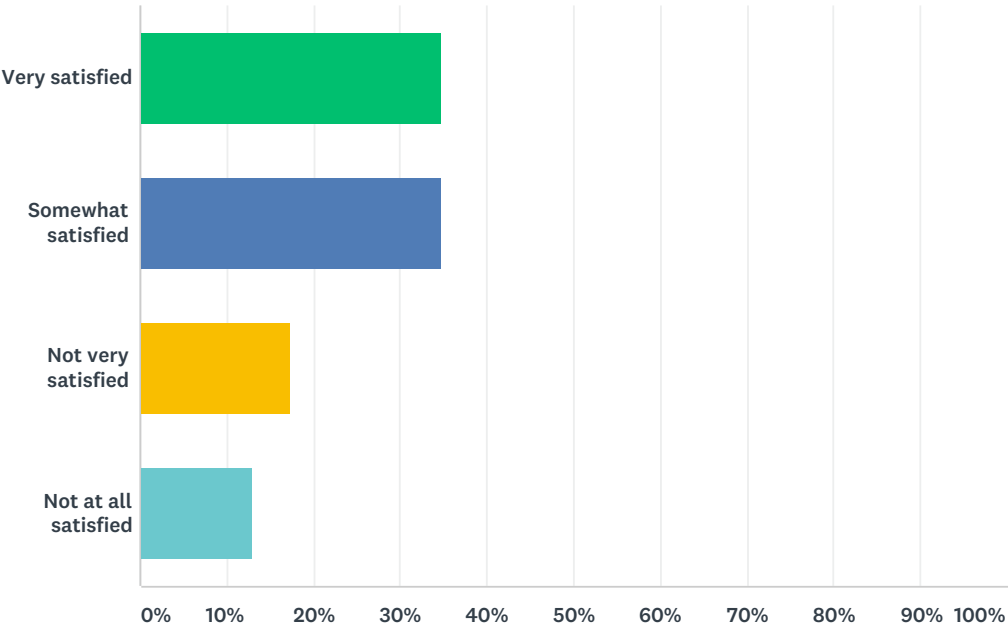
Answered: 27 Skipped: 0



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

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

Answered: 23 Skipped: 4



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

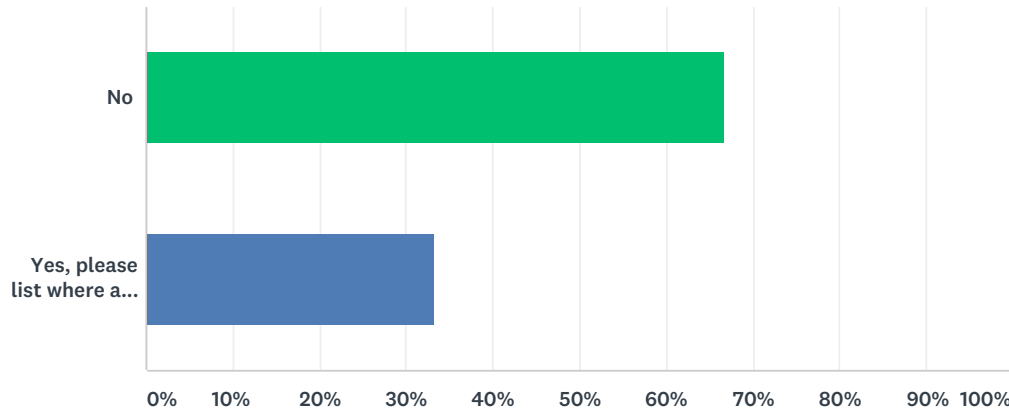
Q11 What improvements would you like to see?

Answered: 20 Skipped: 7

#	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 applied...it 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 pushes 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
20	Improved maintenance of streets/potholes, beautification of common areas. Public Transportation!	12/5/2017 2:04 PM

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

Answered: 21 Skipped: 6

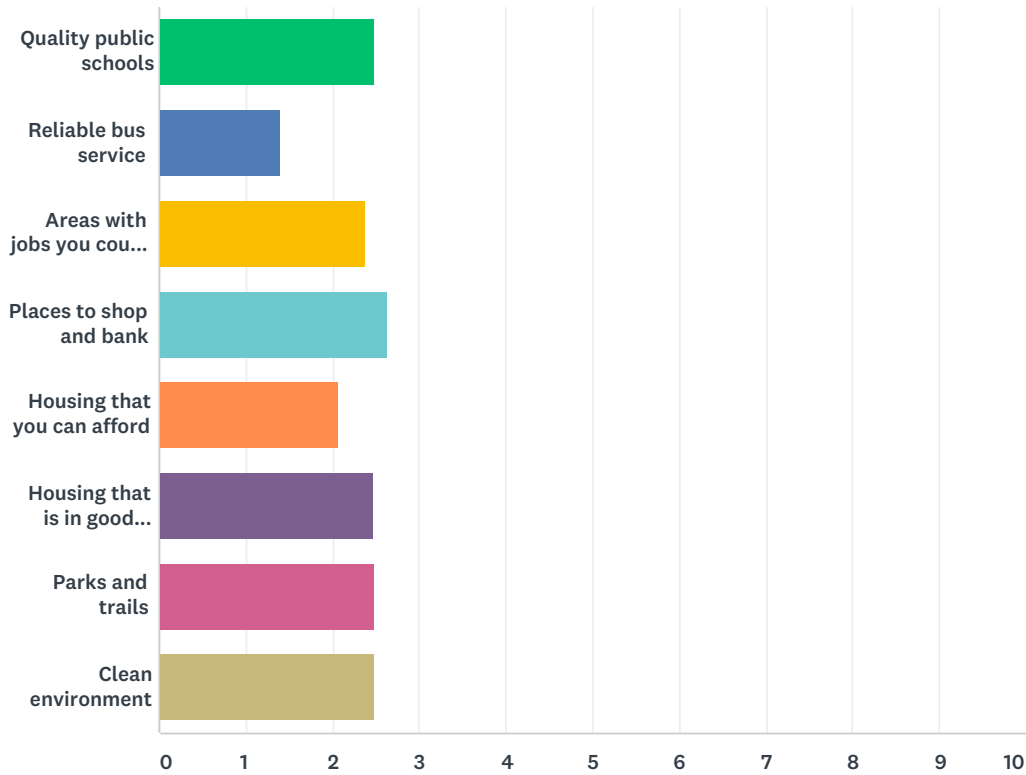


ANSWER CHOICES	RESPONSES	
No	66.67%	14
Yes, please list where and why you would choose that area:	33.33%	7
TOTAL		21

#	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 Atlanta...then 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?

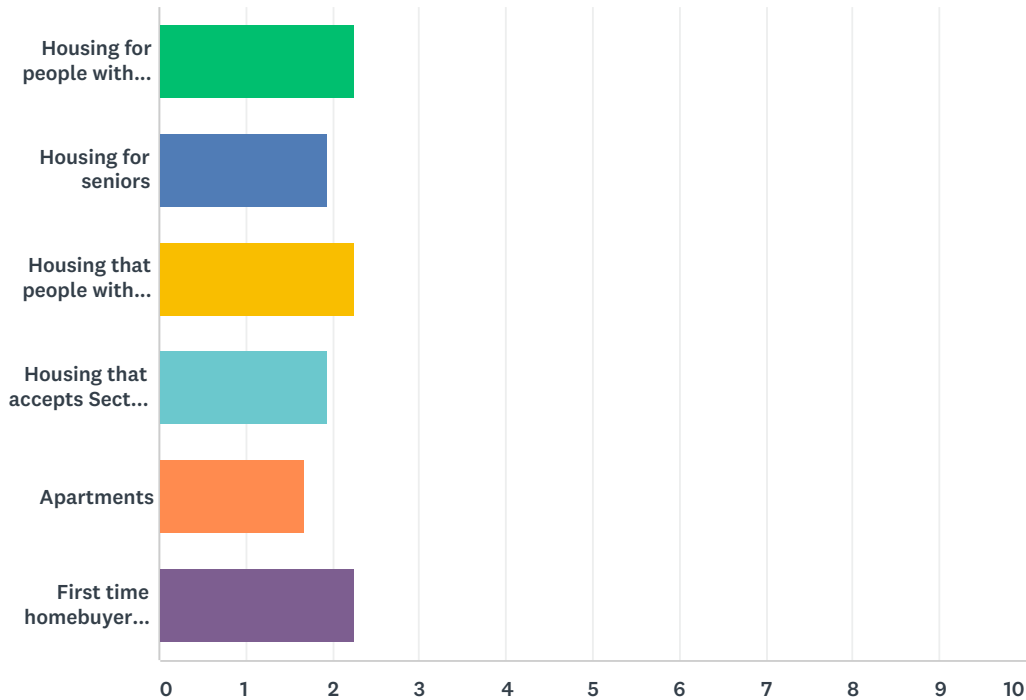
Answered: 24 Skipped: 3



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

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

Answered: 25 Skipped: 2



	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% 5	16.00% 4	40.00% 10	24.00% 6	25	2.26
Housing for seniors	36.00% 9	16.00% 4	32.00% 8	16.00% 4	25	1.95
Housing that people with lower incomes can afford	28.00% 7	16.00% 4	52.00% 13	4.00% 1	25	2.25
Housing that accepts Section 8 vouchers	37.50% 9	20.83% 5	33.33% 8	8.33% 2	24	1.95
Apartments	50.00% 12	16.67% 4	20.83% 5	12.50% 3	24	1.67
First time homebuyer assistance	20.83% 5	20.83% 5	41.67% 10	16.67% 4	24	2.25

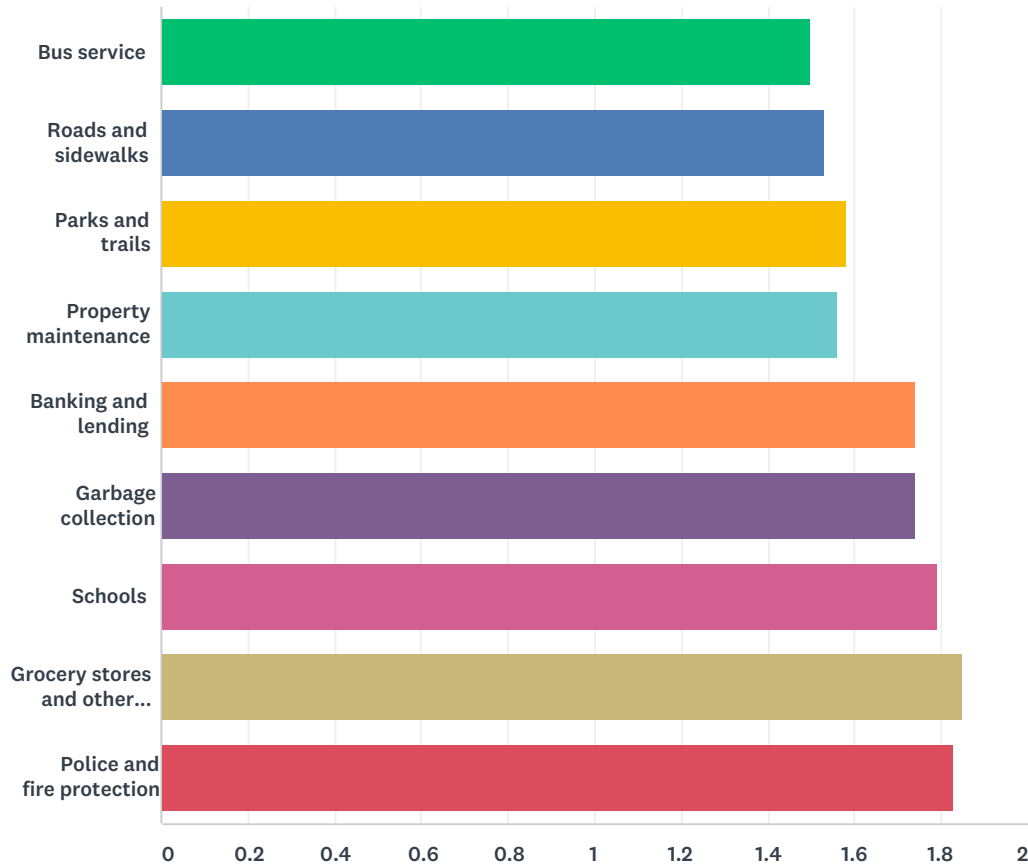
#	PLEASE SHARE ANY OTHER COMMENTS ABOUT LOCAL HOUSING NEEDS:	DATE
1	Can not afford apartment, the rent is so high. Low income housing is dilapidated and unclean. Unsafe environment.	1/2/2018 11:11 AM
2	Just fair and equal opportunity for all	12/27/2017 9:04 PM
3	The need for this is extremely important.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

Cherokee County Fair Housing Survey

4	We already have overcrowded streets, overcrowded schools - so it logically doesn't make sense to keep developing when we are big enough...unless 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.

Answered: 23 Skipped: 4



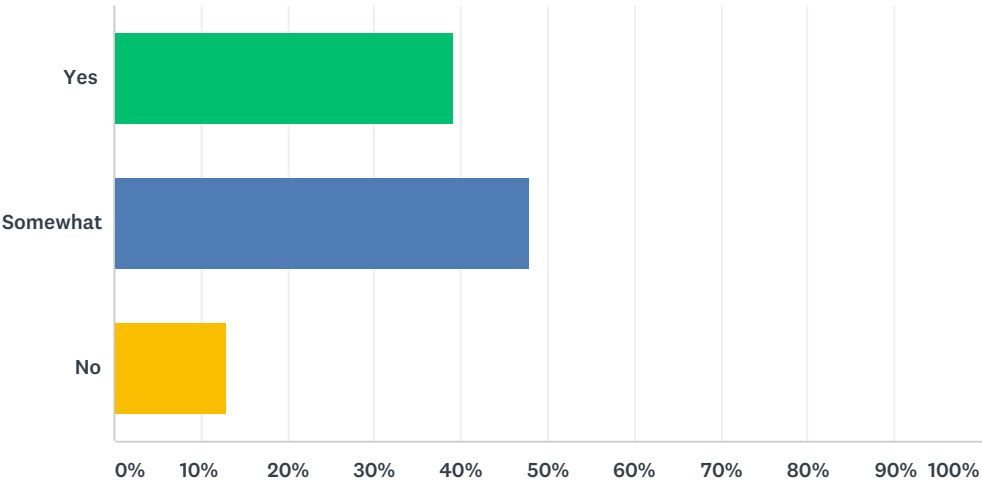
	EQUALLY PROVIDED	NOT EQUALLY PROVIDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Bus service	39.13% 9	39.13% 9	21.74% 5	23	1.50
Roads and sidewalks	45.45% 10	40.91% 9	13.64% 3	22	1.53
Parks and trails	50.00% 11	36.36% 8	13.64% 3	22	1.58
Property maintenance	45.45% 10	36.36% 8	18.18% 4	22	1.56
Banking and lending	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% 15	14.29% 3	14.29% 3	21	1.83
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Q16 Do you understand your fair housing rights?

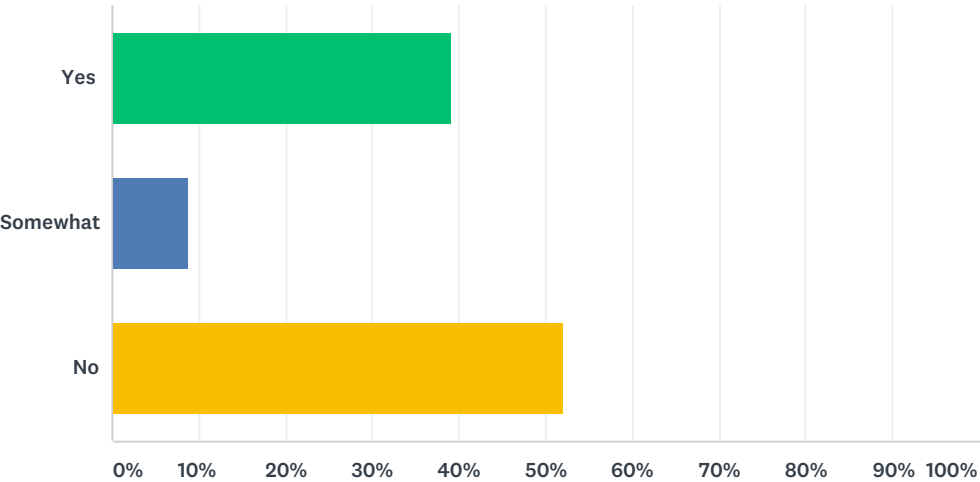
Answered: 23 Skipped: 4



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?

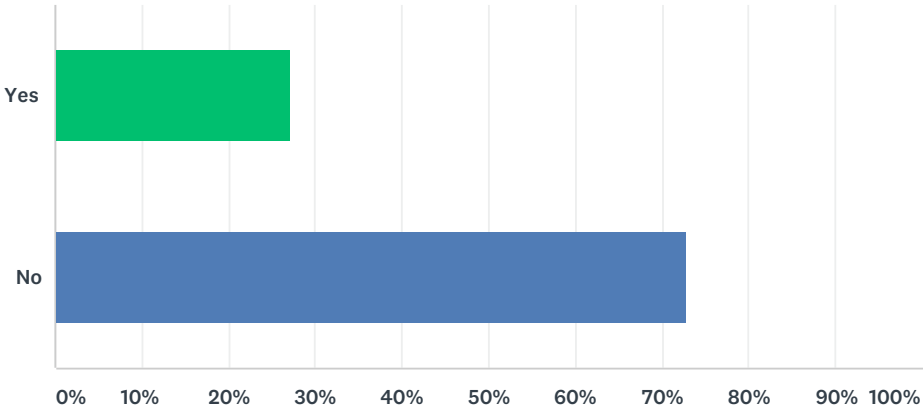
Answered: 23 Skipped: 4



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.

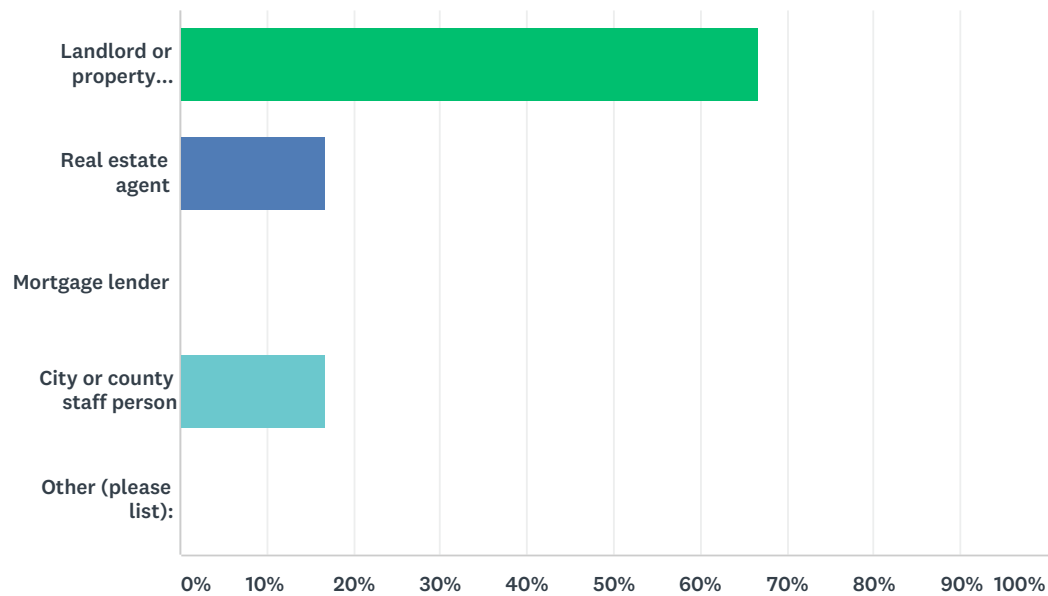
Answered: 22 Skipped: 5



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

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

Answered: 6 Skipped: 21

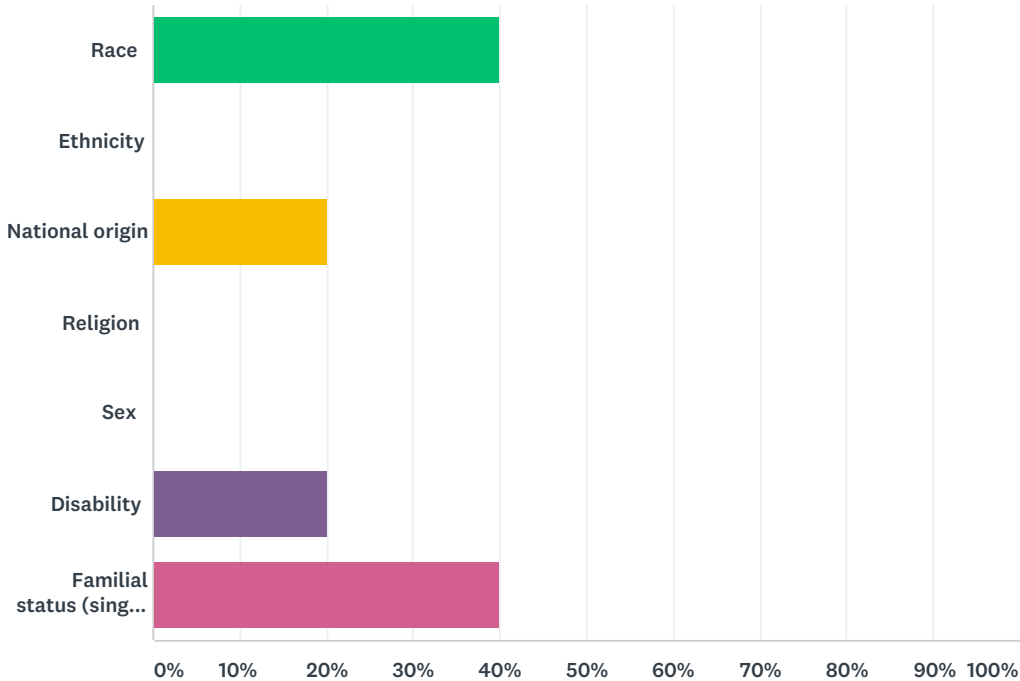


ANSWER CHOICES	RESPONSES	
Landlord or property manager	66.67%	4
Real estate agent	16.67%	1
Mortgage lender	0.00%	0
City or county staff person	16.67%	1
Other (please list):	0.00%	0
Total Respondents: 6		

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

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

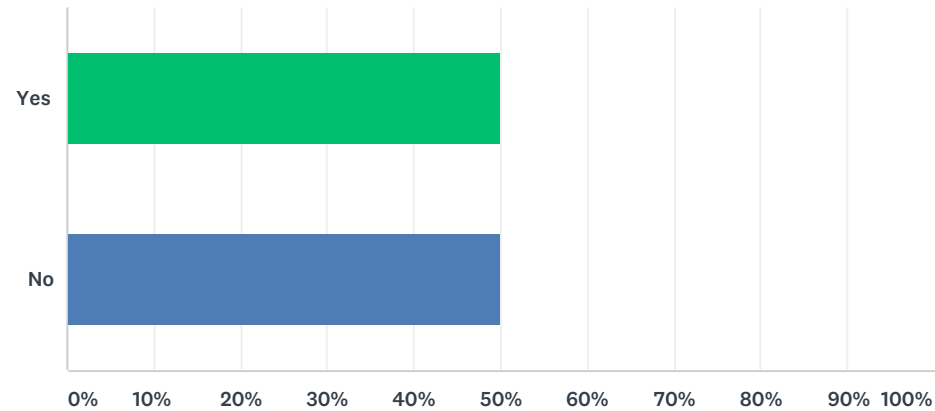
Answered: 5 Skipped: 22



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?

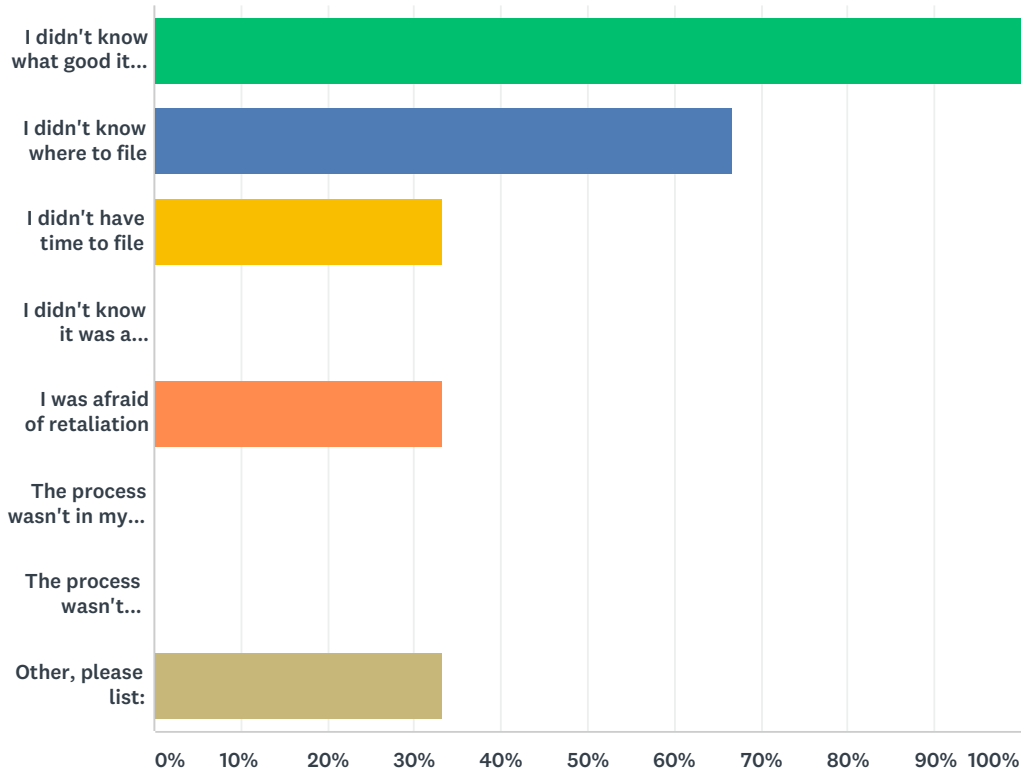
Answered: 6 Skipped: 21



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

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

Answered: 3 Skipped: 24

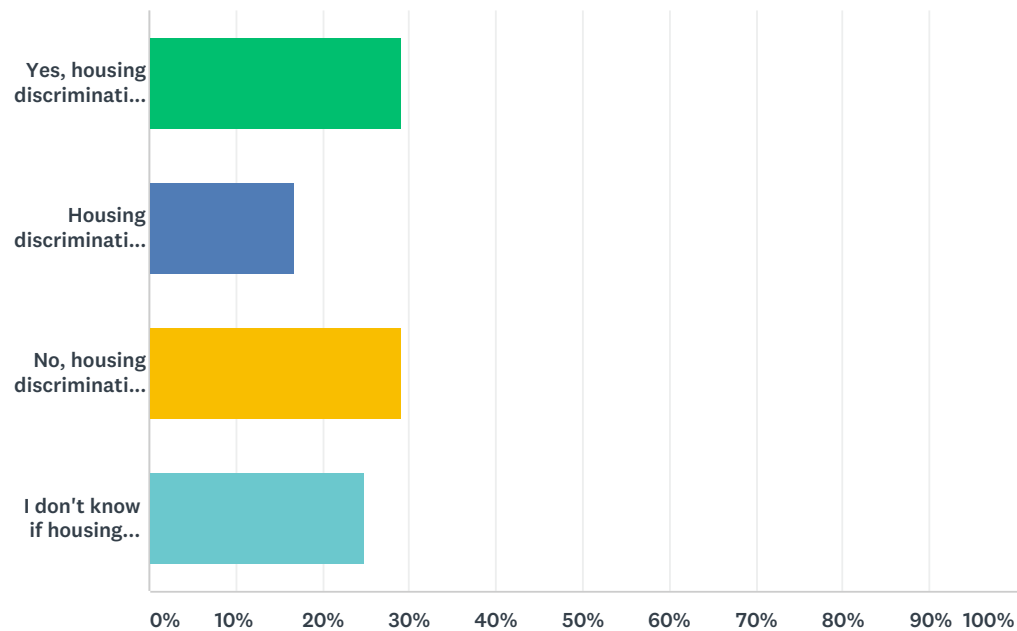


ANSWER CHOICES	RESPONSES	
I didn't know what good it would do	100.00%	3
I didn't know where to file	66.67%	2
I didn't have time to file	33.33%	1
I didn't know it was a violation of the law	0.00%	0
I was afraid of retaliation	33.33%	1
The process wasn't in my language	0.00%	0
The process wasn't accessible 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?

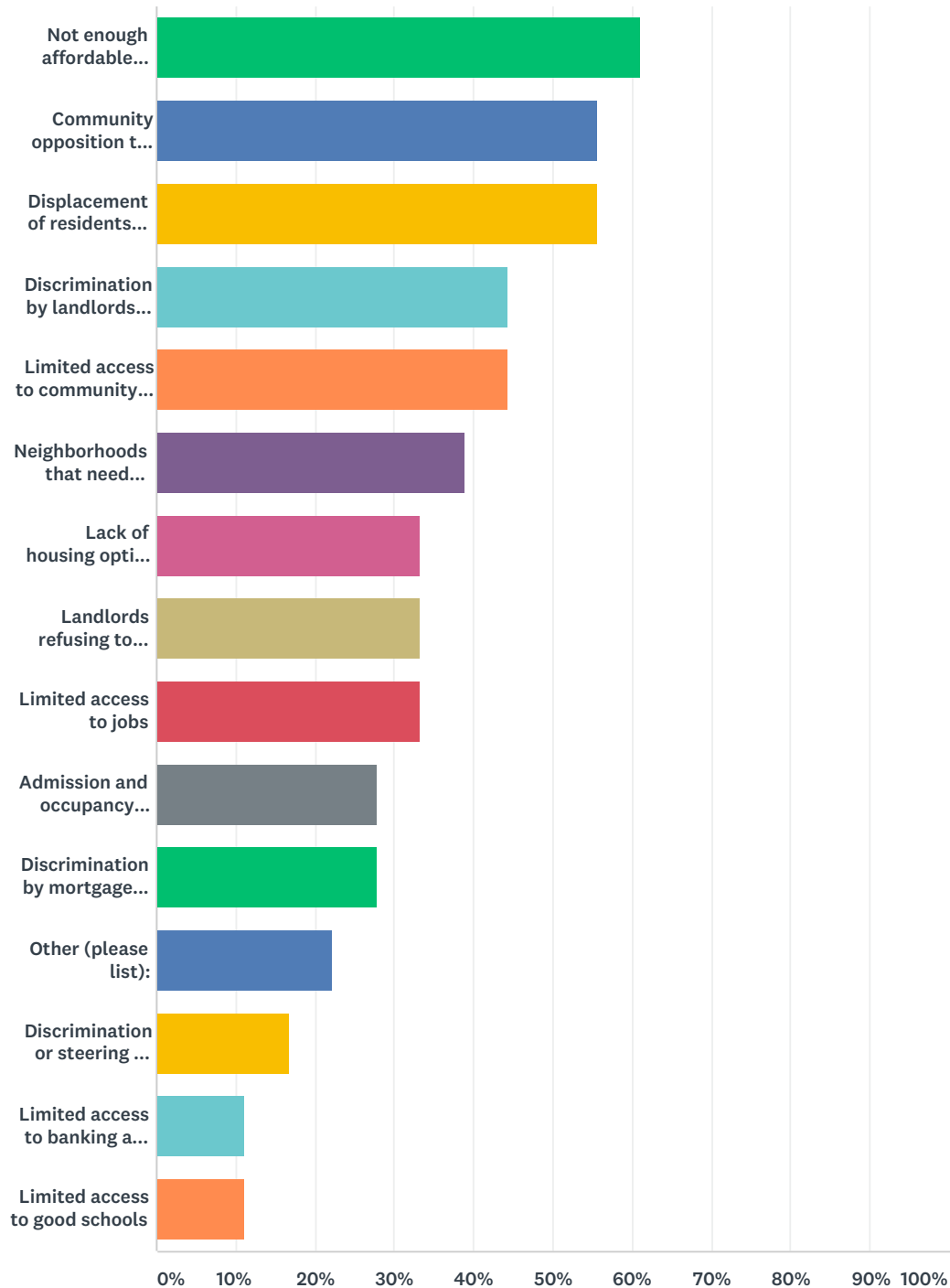
Answered: 24 Skipped: 3



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)

Answered: 18 Skipped: 9



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 children 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 mortgage.... ...while 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

APPENDIX “B”

2019-2023 CONSOLIDATED PLAN AND 2019 ANNUAL ACTION PLAN

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Cherokee County is required to submit to the United States Department of Housing and Urban Development (HUD) a Consolidated Plan for 2019-2023 and an Annual Action Plan for 2019. The Consolidated Plan and Annual Action Plan are submitted as a prerequisite to receiving Community Development Block Grant (CDBG) program funds.

The Five-Year Plan includes a Needs Assessment, Market Analysis, and Identification of Priority Needs and Long-term Strategies. An Annual Action Plan implements the strategies and provides a basis for allocating CDBG resources.

The CDBG Program has three national objectives: (1) Benefit to low and moderate income persons, (2) Aid in the prevention of slum and blight, and (3) Urgent Needs. The activities normally addressed for affordable housing with HOME funds are now incorporated in the Consolidated Plan as a result of the County no longer receiving HOME funds through the consortium.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Cherokee County conducted a needs assessment and market analysis to determine the County's needs for improvements to the community. Community input obtained through interviews and consultation with agencies that serve the needs of low to moderate income persons, public hearings, and direct-mail surveys to nonprofit agencies and other service providers within Cherokee County helped establish the needs and develop long term goals and strategies. Needs Assessment surveys that are made available at all public meetings and on the County's CDBG page on the web (electronic version) also helped formulate strategies and goals. Through this process, an overall focus for CDBG activities will be to meet the National Objective – Benefit to low and moderate income persons.

In addition, the County's Analysis of Impediments to Fair Housing Choice (April 2018) was used to assist with long term strategies to address affordable housing needs. The following goals and strategies were established for the five-year Strategic Plan to guide the County's allocation of CDBG resources for 2019-2023.

Increase the Capacity of Public Facilities and Infrastructure

- Increase services for low to moderate income persons by expanding/improving public facilities
- Improve residential neighborhood safety and livability by expanding/improving public facilities and infrastructure

Increase the Capacity of Public Services and Economic Opportunities

- Provide critical services for low income persons, homeless persons, and other persons with special needs to assist them in obtaining increased stability

-

Preserve and Expand Affordable Housing

- Improve sustainability of homeownership and eliminate substandard housing through a minor/emergency repair program
- Expand the supply of affordable housing
- Expand the supply of affordable rental housing
- Reduce lead-based paint hazard
- Encourage fair housing opportunities

3. Evaluation of past performance

The County has just completed its second five-year Consolidated Plan with HUD. Public Facilities included the construction of a senior center in underserved Ball Ground where seniors were able to meet only one day a week and the expansion of the senior center in Woodstock to accommodate the growing population of seniors; renovations to the Boys & Girls Club to benefit low-to-moderate income youth, repairs and improvements and replacement of HVAC to two group residences situated on a campus of group homes for boys in foster care and security improvements to a group home for girls in foster care; acquisition of a building for a child advocacy agency to improve supervised visitation for children in foster care and the acquisition of additional space for a nonprofit healthcare services provider to expand services to uninsured and underinsured low-to-moderate income persons; improvements were made to the County's senior center to shelter home-delivered meals volunteers and additional space was constructed to store donated personal care items, mobility assistance items, and portable fans/heaters for seniors in need; the cities of Holly Springs, Ball Ground, and Woodstock benefitted from the expansion of infrastructure with the installation of sidewalks, stormwater improvements, and curb cuts and ramps to sidewalks in low-to-moderate income neighborhoods. As the Cities' infrastructures continue to age in older neighborhoods, infrastructure improvements are critical for maintaining neighborhoods as affordable.

Non-profit organizations within the County that meet the needs of the LMI community by providing critical services continue to be a major focus of the program. Nonprofit agencies that serve battered and abused adults, victims of child abuse, children in foster care, developmentally disabled adults,

seniors, and LMI youth, provide transportation services, counselling, educational opportunities, and advocacy services to the most vulnerable clients, the homeless and near homeless, and abused and/or neglected children. Through the support from the County, they have been able to expand and improve services even when other sources of funding decrease.

The County began a minor/emergency home repair program in 2015 as a result of the disbanding of the consortium of jurisdictions receiving HOME funds through Cobb County. The pilot program was begun as a partnership with Habitat for Humanity who administered the program. Seniors, veterans, and disabled persons are targeted to help them age in place. Initially, 10 households were served, and the program's success has secured continued support by the County with increased funding to continue the program. Thirty-four households, and counting, have since been assisted with repairs ranging from new roofs, replacement of HVAC systems, plumbing repairs, and structural repairs.

The County funded the acquisition of 25 lots during the past consolidated plan period to expand the supply of affordable housing. Habitat for Humanity vets candidates for the program who must provide sweat equity and complete training in managing household finances.

4. Summary of citizen participation process and consultation process

The County held two public hearings during the course of the planning process to receive input from citizens, held stakeholder interviews, and had consultations with groups addressing housing to assess the needs. Priorities needs were established and the ranking process helped formulate long-term goals and strategies. In addition, stakeholder surveys were mailed to nonprofit agencies and cities within the jurisdiction to solicit input for unmet needs in the community.

Opportunities for citizens and stakeholders to comment on the draft Consolidated Plan were provided through a public comment period and public hearing, both in the initial Consolidated Planning process in 2018 and again after funding was announced for the first year action plan in 2019.

5. Summary of public comments

Through public notice in the newspaper, the public was invited to comment on the Consolidated Plan and one-year action plan at two public hearings, with the option to supply comments by email or phone. The County did not receive any public comments to be reviewed during the public comment period in 2018 or the public comment period in 2019.

6. Summary of comments or views not accepted and the reasons for not accepting them

Not applicable - no comments were received.

7. Summary

The 2019-2023 Consolidated Plan will address three primary goals: 1) Improve the Capacity of Public Facilities and Infrastructure; 2) Increase the Capacity of Public Services and Economic Opportunities; and, 3) Preserve and Expand Affordable Housing. CDBG funds will primarily be allocated to all of these goals as the County no longer receives HOME Program funds.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	CHEROKEE COUNTY	
CDBG Administrator	CHEROKEE COUNTY	CDBG Program Office/Finance
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

On October 1, 2018, the County reorganized the reporting structure of the Administrative Services Agency and the Finance Department with the promotion of the Finance Director to CFO. The CDBG Program Office has reverted back to the Finance Department's organizational chart.

Consolidated Plan Public Contact Information

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Cherokee County CDBG Program

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

In addition to the consultations with nonprofit agencies and services providers, needs assessment surveys were sent out to agencies, who may not have participated in a public meeting previously held by the County, as well as agencies who make regular contact with the program office, for stakeholder input. The objective of the surveys was to gather perspective and data from agencies regarding unmet needs in the community from a range of service providers.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

In the process of developing the 2019-2023 Consolidated Plan, the County consulted with community members and representatives from local organizations providing housing and services to low and moderate income households in Cherokee County. Among the primary organizations consulted during the planning process were Canton Housing Authority, North Central Georgia Habitat for Humanity, Cherokee Family Violence Center, Bethesda Community Health Clinic, MUST Ministries, Inc. - Cherokee, Goshen Valley Boys Ranch and the County's Senior Center. The County participates in the monthly meetings hosted by Cherokee FOCUS, a collaborative meeting coordinating efforts between private businesses, public agencies, and the faith community to share resources for meeting the needs of persons in need of housing, homeless prevention services, medical services, basic necessities, and services for persons challenged with addictions and dependencies. This coordinated effort opens doors for organizations to seek funding through collaboration.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Cherokee County receives funds through the Balance of State Continuum of Care. Local organizations, such as MUST Ministries, Inc. and Cherokee Family Violence Center, are the driving forces for addressing the needs of the homeless persons within Cherokee County and MUST Ministries receives funds directly from the Balance of State. With the most recent Balance of State Continuum of Care application cycle, the County saw two additional agencies seek Certification of Consistency with the County's Consolidated Plan for their projects submitted for CoC Programs (Rapid Rehousing). In addition, agencies that apply for Balance of State Continuum of Care projects such as S+CR and PSH-PH and ESG funds submit to the County for Certification of Consistency with the Consolidated Plan. The County requests project information and other pertinent program information to ensure needs are addressed. The County participates in the local PIT counts and continues to support the efforts of those organizations addressing the needs of the homeless population.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The County does not receive ESG funds. MUST Ministries, Inc. - Cherokee applies to the State for Balance of State Continuum of Care funding, which includes ESG funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MUST Ministries
	Agency/Group/Organization Type	Housing Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The County consults with MUST Ministries through regular meetings and through referrals for services. MUST Ministries has taken the lead role for the PIT Homeless Count and provides access to its Elizabeth Inn shelter in Cobb County. MUST was given a direct-mail survey to ascertain unmet needs in the community and responded with helpful data. MUST Ministries has plans to partner with the County to increase affordable rental housing for LMI persons.
2	Agency/Group/Organization	North Central Georgia Habitat for Humanity
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat previously served as the CHDO for the County when the County received HOME funds through the consortium with Cobb County. They currently administer the Minor/Emergency Home Repair program and provide year-round input into the affordable housing needs in the County. They are represented at the Housing and Services Forum Meeting hosted by Cherokee FOCUS and is a member of the Housing Collaborative that includes the County's Senior Services, Homeless Veterans of Cherokee County (501(c)(3)), the Volunteer Aging Council (501(c)(3), and the Marine Corp League, to address home repairs and housing needs within the County for veterans, persons aged 55+, and disabled persons. The information provided by Habitat allows the County to make informed funding decisions to address the affordable housing needs within the community and therefore plan for annual assisted households and additions to the affordable housing stock of the County.
3	Agency/Group/Organization	Next Step Ministries, Inc.
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Next Step provides monthly updates to the County reporting the number of beneficiaries served. The Executive Director was given a Needs Assessment Survey to provide input on the unmet needs of the community. The agency serves severe/profound developmentally delayed young adults who have aged out of the school system and have a need for improved transportation services. Their clients are separated by cognitive abilities and higher cognition clients are provided job training, while lower cognition clients are given individualized educational plans to assist in basic functions such as using silverware to eat. Next Step was given a direct-mail survey to provide insight into the unmet needs in the community. The agency is operating at capacity, leasing additional space a few miles away and plans to expand the facility.</p>
4	Agency/Group/Organization	Cherokee Senior Services
	Agency/Group/Organization Type	Housing Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Senior Services provides ongoing updates at the Housing Collaborative meetings, and the Director was given a stakeholder survey to complete for the Needs Assessment portion of the Con Plan. A phone meeting with a local developer to have a conversation about LIHTC's was coordinated by the director. Senior Services provides periodic reporting of seniors looking for affordable housing as well. Services at the center include home-delivered meals, congregate care, case management, and other services to assist the elderly and frail elderly. Because the primary development in the County is recently not affordable housing, especially for seniors on a fixed income, Senior Services is helping to determine viable options for senior housing similar to housing in Gwinnett County and Dekalb County.</p>

5	Agency/Group/Organization	Housing Authority of Canton
	Agency/Group/Organization Type	Housing PHA Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Telephone interviews with the Agency Director were used to ascertain the needs of the public housing residents. These interviews indicated that the HA is feeling the brunt of insufficient funds to help maintain its 145 units. While they meet Section 504 requirements, these units have an extremely long wait list. Measures to assess the physical condition of units were determined to be underway to prepare for rehab of all three campuses. Current residents do not generally become homeowners. Coordination with Habitat for Humanity - North Central Georgia for will be encouraged to foster home ownership through application workshops. The Executive Director and select members of the HA Board have formed a focus group to find ways to increase the number of public housing units and improve the condition of existing units. Other members include the CDBG Program Office and Senior Services.
6	Agency/Group/Organization	Bethesda Community Clinic, Inc.
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Bethesda Community Clinic provides low cost/no cost health care services to the uninsured and underinsured persons of Cherokee County. The County met with the Executive Director and grants manager to ascertain the impact of previously funded projects and to determine the extent of need in the community. Because of the expansion of the facility, the agency is able to provide services five days a week, up from two days. Understanding the need for improved transportation services, the agency is undergoing a long-range planning and feasibility assessment of providing mobile health care services in the community.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

Agencies that might not have been contacted via telephone or meeting, responded to the direct mail surveys that were sent to nonprofit agencies within the community. Every attempt possible was made to reach a range of service providers, and together with the input received during the Analysis Impediments, the County believes a broad representation of input was obtained.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	MUST Ministries, Inc. - Cherokee	There is no overlap of strategic plan goals as the County Program Office receives only CDBG funds. MUST receives ESG funds through the Balance of State Continuum of Care.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

Cherokee County and each of the participating cities work closely in identifying needs within the individual jurisdictions. These efforts are through, at minimum, annual meetings with the local governments. The County participates in two collaborative groups, one that focuses on housing needs and one that includes other agencies that provide human services, health care services, and housing. Each one convenes on a monthly basis so the County is able to monitor changing needs in the community.

Narrative (optional):

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Throughout the County's program year, citizen needs assessment surveys are made available at every public hearing and public meeting hosted by the CDBG Program Office in addition to having an embedded link on the CDBG page of the County website. Survey responses obtained are reviewed and summarized throughout the program year to assist in planning for the Annual Action Plan and Consolidated Plan. The County held a public hearing during a 30-day comment period, in 2018, for the public to have an opportunity to comment on the draft of the Consolidated Plan and Annual Action Plan for the first year of the Plan. A second public comment period was held in 2019 after funding was announced. Historically, citizen response and participation are low, so the County's website and Facebook page are used more frequently and intentionally. Public meetings held at service providers help to obtain meaningful participation by citizens and stakeholders.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	The County placed a legal notice in the County's legal organ, Cherokee Tribune, to obtain citizen input with needs assessment surveys in addition to opening of a comment period for the draft of the Con Plan and Annual Action Plan. The publisher's affidavit can be found in the URL listed for this mode of outreach.	There were no comments received.	There were no comments that were not accepted.	https://www.cherokeega.com/CDBG/documents.php

2	Internet Outreach	Non-targeted/broad community	The CDBG Program Office added, to its page on the County website, a subsection dedicated to the Consolidated Plan process. A link for the needs assessment survey was embedded on that subsection and the link is also found on the landing page of the CDBG page. In addition, a draft of the Con Plan and Annual Action Plan were made available during two 30-day comment periods.	There were no comments received.	There were no comments that were not accepted.	https://www.cherokeega.com/CDBG/FIVE-YEAR-CONSOLIDATED-PLAN/
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Non-targeted/broad community	Public hearing notices are published in the County's legal organ and there were no citizens in attendance at the public hearing.	There were no comments received.	There were no comments that were not accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community	As part of the County's annual planning processes, two public meetings are held to obtain stakeholder and citizen input. Generally, stakeholders are well represented and citizen participation is a challenge. Social Media outlets are enlisted to garner input from citizens.	As with the direct mail surveys, affordable housing, workforce housing, and improved transportation were the most significantly reported comments and needs for the community.	There were no comments not accepted.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

In addition to the consultations with nonprofit agencies and services providers, needs assessment surveys were sent out to agencies, who may not have participated in a public meeting previously held by the County, as well as agencies who make regular contact with the program office, for stakeholder input. The objective of the surveys was to gather perspective and data from agencies regarding unmet needs in the community from a range of service providers.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Low-to-moderate income residents of Cherokee County are met with a significant challenge whether seeking affordable housing or maintaining aging homes. As the affordable housing stock declines, housing cost burden is the most prevalent housing problem for households in the County. CHAS data from Table 7, below, estimates that 3,294 renters and 5,643 owners have a cost burden in excess of 30% of income. As households experience severe housing problems, renters with incomes at or below 30% of AMI assume the largest share of households with severe housing problems (46%) while owner households with incomes greater than 30% up to 50% AMI have more occurrences of severe housing problems (31%) than other owner income levels.

Small Related households, more so than *Large Related*, *Elderly*, or *Other* types, generally carry a cost burden greater than 30% within LMI households with half of the renter households. Similarly, more LMI owners in the *Small Related* category experience a cost burden greater than 30% at 41% owner households. For LMI renters, the income level most burdened with cost is the **>30%-50% AMI** for *Small Related* households. For LMI owners, the income level most burdened with cost is the **>50%-80% AMI** level, again, for *Small Related* households. Elderly households tend to be owners rather than renters with the household income level, **>50%-80% AMI**, being most represented (cost burden >30%) but exceeding the **0-30% AMI** *Elderly* owner households by only 14 households. Similar data results at **Cost Burden > 50%** (Table 10) and is analyzed with respect to occurrences and proportion - small households, in general, represent the highest burdens. The exception is for *Small Related* (renter) households at the income level **0-30% AMI** and it is most burdened rather than **>30%-50% AMI**.

A major gap is the lack of assistance for families who cannot afford available housing resources. Public housing has 145 units with a waiting list of 154 families. The wait list was opened up October 4th, 2018 and the housing authority sought applicants for 2-, 3- and 4-bedroom units. The greatest need is for 1-bedroom units with a 2-3 year wait time for availability. By February 2019, there were 200+ families on the housing authority's wait list.

Demographics	Base Year: 2000	Most Recent Year: 2013	% Change
Population	141,903	219,015	54%
Households	51,937	76,371	47%
Median Income	\$60,896.00	\$67,261.00	10%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	5,774	7,150	10,685	7,844	44,900
Small Family Households	1,993	2,879	4,593	3,533	26,975
Large Family Households	485	769	1,018	888	4,759
Household contains at least one person 62-74 years of age	1,240	1,603	2,571	1,299	7,939
Household contains at least one person age 75 or older	753	1,090	1,293	569	1,553
Households with one or more children 6 years old or younger	1,072	1,539	2,236	1,434	9,049

Table 6 - Total Households Table

Data 2009-2013 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	45	75	50	50	220	25	0	30	10	65
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	50	100	15	0	165	10	15	0	0	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	165	195	135	100	595	115	145	120	39	419
Housing cost burden greater than 50% of income (and none of the above problems)	1,729	1,109	490	4	3,332	1,899	1,980	1,760	650	6,289

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	239	953	1,593	509	3,294	385	768	2,402	2,088	5,643
Zero/negative Income (and none of the above problems)	214	0	0	0	214	378	0	0	0	378

Table 7 – Housing Problems Table

Data 2009-2013 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,989	1,474	690	154	4,307	2,049	2,140	1,905	700	6,794
Having none of four housing problems	409	1,359	2,833	1,919	6,520	754	2,174	5,253	5,079	13,260
Household has negative income, but none of the other housing problems	214	0	0	0	214	378	0	0	0	378

Table 8 – Housing Problems 2

Data 2009-2013 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	963	1,263	1,079	3,305	779	1,038	2,073	3,890
Large Related	255	150	240	645	115	498	343	956
Elderly	388	349	494	1,231	1,005	830	1,119	2,954
Other	584	522	389	1,495	439	514	659	1,612
Total need by income	2,190	2,284	2,202	6,676	2,338	2,880	4,194	9,412

Table 9 – Cost Burden > 30%

Data 2009-2013 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	848	553	175	1,576	685	850	1,040	2,575
Large Related	220	45	10	275	100	288	84	472
Elderly	323	179	200	702	785	480	482	1,747
Other	540	384	120	1,044	394	409	165	968
Total need by income	1,931	1,161	505	3,597	1,964	2,027	1,771	5,762

Table 10 – Cost Burden > 50%

Data 2009-2013 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	215	280	110	55	660	45	95	60	35	235
Multiple, unrelated family households	0	65	40	80	185	70	60	60	4	194

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	0	0	0	0	0	10	0	0	0	10
Total need by income	215	345	150	135	845	125	155	120	39	439

Table 11 – Crowding Information – 1/2

Data Source: 2009-2013 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

Housing assistance is a challenge for young, single persons aging out of foster care programs. Two non-profit agencies working with this population have programs, or are working to develop programs with measures to prevent these young people from a cycle of homelessness. One agency has a work program with nearby housing to overcome transportation limits. Additionally, another nonprofit agency in the county, uses CDBG-funded transportation to transport at-risk youth who have not graduated high school. Assistance is provided to these dropout youths to help them obtain a GED. Transportation is provided to job interviews, training, and job sites to get them stable.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In 2017, Cherokee Family Violence Center (CFVC) assisted 2,220 victims of domestic violence (an increase over the data provided in the last Consolidated Plan Needs Assessment of more than 1.5 times the reported number of victims in 2011). During that time CFVC provided 4,616 emergency bed nights for women and children. The transitional housing program has 72 beds, and the emergency housing has 12 beds, which ran at 106% for 2016.

Wheelchair accessibility represents the greatest need for disabled adults seeking public housing. The waiting list for a wheelchair accessible unit is two to three years. Persons with disabilities enter the wait

list through preference point for public housing. Residents requiring modifications to units in which they reside have grab bars and ramps installed upon request.

What are the most common housing problems?

From the **Housing Problems** table (Table 7) found within the **Housing Needs Summary Tables**, we can determine that the most prevalent housing problem is cost burden. Owner households having a cost burden greater than 50% of income are fairly evenly represented in each of the AMI categories while owner households having a cost burden greater than 30% of income generally fall in the **>50-80% AMI** income level. Renter households **0-30% of AMI** were more likely to experience cost burdens of 50% or more of income while the renters with greater than 30% cost burden were evenly represented at all AMI income levels. The County's Analysis of Impediments to Fair Housing Choice (April 2018) revealed the lack of affordable housing as a priority issue.

A significant number of households experiences one or more severe housing problems (lacks kitchen or complete plumbing, severe overcrowding, severe cost burden). Cost burden, including households with severe housing cost burden of greater than 50% of income accounts for the greatest number of housing problems for both renters (6,840 or 87%) and owners (12,310 or 93%). Assessing the other housing problems, the number of households lacking complete plumbing or kitchen facilities ranks low compared to cost burden (220 renter households and 65 owner households). Additionally, overcrowded households, including severely overcrowded households (**>1.51 people per room**), tally up to 760 for renters and 444 for owners.

As households experience severe housing problems, renters with incomes **at or below 30% of AMI** assume the largest share of households with severe housing problems (46%) while owner households with incomes **greater than 30% up to 50% AMI** have more instances of severe housing problems (32%) than other owner income levels.

Are any populations/household types more affected than others by these problems?

Small related households carrying a cost burden greater than 30% of income represent half of the LMI renter households, with a concentration of renters falling in the **less than 30% of AMI** income level. Similar to LMI renters, *small related household* owners hold 41% of the share of households with a greater than 30% cost burden. The AMI income level with the highest number of *small related households* that experience a cost burden of greater than 30% is the level where households are making 50-80% of the AMI. Considering *elderly households*, they tend to be owners rather than renters with those **>50-80% AMI** households experiencing greater than 30% income cost burden more frequently. Cost burden greater than 50% of income reflects similar trends as above for renters (0-30% AMI).

Overcrowding, while not a big housing problem, affects renters in single family households more than any other group. According to the American Community Survey (2012-2016), median rents for the County are \$860 per month.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Families with children and very low incomes are at a high risk of becoming homeless. Housing within their income resources often means living in substandard housing and overcrowded conditions. These households may require childcare services, health care, employment training and counseling, treatment for substance abuse, mental health counseling, and life skills and/or parenting skills training. Individuals in the lowest income categories have similar issues and often have a limited support system.

Households with extremely low incomes and persons with disabilities who rely on SSI income are particularly at risk. The National Low Income Housing Coalition's annual report, *Out of Reach: The High Cost Housing 2018*, reports that the national Housing Wage, the hourly wage a full-time worker must earn to afford a modest rental home while spending no more than 30% of his/her income on rent and utilities, must earn \$22.10/hr. At this rate, a full-time minimum wage earner must work 122 hours a week for 52 weeks of the year to afford a two-bedroom apartment or 99 hours per week to afford a one-bedroom apartment at fair-market rent. The federal minimum wage rate is (\$7.25) and is \$14.85 less than the national two-bedroom Housing Wage. Analysis at the County level reveals an average Housing Wage at \$22.30 with the range of required Housing Wages coming in at a low of \$16.79 (for zero bedroom units) to a high of \$31.75 (for four bedroom units). Working the minimum wage in Cherokee County would require 109 hours a week to afford a two-bedroom apartment or 95 hours per week for one-bedroom apartment at fair-market rent. Seniors on fixed incomes and single parents (especially women) with young children are at risk of homelessness and/or housing instability. These households often have to choose between necessities such as housing and food or medication.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The extent of persons at risk of homelessness is not available on a local level. The discussion above provides insight into the extent of persons housed precariously.

CHAS Table 7 shows that 9,621 households are paying over 50% of their income for housing costs. This data shows that 1,729 renter households and 1,899 owner households making less than 30% of AMI

were paying more than 50% of their income for housing costs. Elderly households totaled 1,108 at the **0-30% AMI** level (Table 10). Although households at the lowest percentage of area median income level are the most vulnerable with little savings to rely on in case of emergency or unplanned expenses or illness, the data shows a creep of increased numbers of both owner and renter households experiencing cost burden in excess of 50% of household income.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The primary factors affecting housing instability and increased risk of homelessness include unaffordable rents and homeowner costs and the poor condition of the housing. The cost of utilities, food and medical services are also characteristics that add increased risk to homelessness. Major non-housing characteristics include income, family instability, domestic violence, substance abuse, health issues, and underemployment/loss of employment.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD considers a disproportionately greater need to exist when the members of a racial or ethnic group experience housing problems at a greater rate (ten percentage points higher) than other members of the category of need as a whole. Housing problems include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and cost burden greater than 30% of household income.

As Cherokee County continues to urbanize, racial and ethnic composition has gradually become more diverse. The portions of persons classified as Non-Latino White has dropped from 89.6% in the 2010 Census to 81.34% in the 2012-2016 Five-Year American Community Survey and the Black or African American population has increased to 6.5% (2012-2016 ACS) from 6.2% in the 2010 Census. While the Latino population doubled from the 2000 Census to the 2010 Census (5% to about 10%), the proportion of persons reporting themselves as Hispanic or Latino Origin is estimated at about the same for the ACS data for 2012-2016 at 9.9%.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,644	558	592
White	3,388	513	533
Black / African American	379	15	25
Asian	35	0	0
American Indian, Alaska Native	10	0	4
Pacific Islander	0	0	0
Hispanic	790	30	14

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,343	1,817	0
White	3,798	1,592	0
Black / African American	400	44	0
Asian	185	50	0
American Indian, Alaska Native	50	0	0
Pacific Islander	0	0	0
Hispanic	879	109	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,575	4,095	0
White	5,190	3,505	0
Black / African American	373	104	0
Asian	149	45	0
American Indian, Alaska Native	10	20	0
Pacific Islander	0	0	0
Hispanic	793	375	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,431	4,433	0
White	2,856	3,783	0
Black / African American	265	239	0
Asian	40	20	0
American Indian, Alaska Native	10	40	0
Pacific Islander	0	0	0
Hispanic	260	280	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2009-2013 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The CHAS Tables 13-16 show that a disproportionate amount of Hispanic households (95%), Black or African American households (90%), and Asian households (100%) with incomes *at or below 30% of AMI*, had one or more housing problems compared to White households (76%). Overall, for households in the County with income *at or below 30% of AMI* eight out of ten households (80%) have one or more housing problem.

Among households *between 30% - 50% of Area Median Income*, a disproportionate share of housing problems occurred for Black / African American households (90%), American Indian / Alaska Native household (100%), and Hispanic households (89%) compared to White households and the jurisdiction as a whole.

For households with *50% - 80% of Area Median Income*, a disproportion of housing problems existed for the Black or African American (78%) and Asian (77%) populations. While the Asian community came in at 77%, seventeen percentage points greater than the White population, it should be noted that the Asian population represents only 1.7% of the population overall [Source: 2012-2016 ACS 5-Y Estimates]. Similar analysis results for the income level representing *80%-100% of AMI* show Black or African American households (53%) and Asian (67%) households, compared to White households (43%), having a disproportionate share of housing problems.

The CHAS tables indicate that a disproportionate needs exist in some populations. However, of note is the relative proportion minority households make up the total households in the County. A conclusion drawn from the *Analysis of Impediments to Fair Housing Choice* was that 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%). In terms of numbers of households in the County, the total is represented by 65,387 white households, or 86%, 4,049 Black/African American households, or 5%, and 5,004 Hispanic households, or 7%. At the time the AI was done, the County did not have any Racially or Ethnically Concentrated Areas of Poverty, but the Minor/Emergency Home Repair Program will heed the findings of the data analysis, here, to reach more minority households.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD considers a disproportionately greater need to exist when the members of a racial or ethnic group experience housing problems at a greater rate than other groups as a whole. Housing problems include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and cost burden greater than 50% of household income.

As Cherokee County continues to urbanize, racial and ethnic composition has gradually become more diverse. The portions of persons classified as Non-Latino White has dropped from 89.6% in the 2010 Census to 81.34% in the 2012-2016 Five-Year American Community Survey and the Black or African American population has increased to 6.5% (2012-2016 ACS) from 6.2% in the 2010 Census. While the Latino population doubled from the 2000 Census to the 2010 Census (5% to about 10%), the proportion of persons reporting themselves as Hispanic or Latino Origin is estimated at about the same for the ACS data for 2012-2016 at 9.9%.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,038	1,163	592
White	2,878	1,008	533
Black / African American	354	40	25
Asian	35	0	0
American Indian, Alaska Native	10	0	4
Pacific Islander	0	0	0
Hispanic	705	115	14

Table 17 – Severe Housing Problems 0 - 30% AMI

Data: 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,614	3,533	0
White	2,554	2,827	0
Black / African American	255	193	0
Asian	185	50	0
American Indian, Alaska Native	0	50	0
Pacific Islander	0	0	0
Hispanic	619	364	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,595	8,086	0
White	1,884	6,801	0
Black / African American	139	343	0
Asian	70	124	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	464	704	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	854	6,998	0
White	694	5,948	0
Black / African American	60	444	0
Asian	0	60	0
American Indian, Alaska Native	0	50	0
Pacific Islander	0	0	0
Hispanic	90	450	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2009-2013 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Tables 17-20 review the *severe housing problems* for homes in the various AMI groups. The results from the analysis of the *severe housing problems* mirror the housing problems analysis in the previous section with a few exceptions. What separates the data in this section is the *cost burden* (over 50% versus over 30%) and the *crowding rate* (more than 1.5 persons per room compared to more than 1 person per room). The same groups (race/ ethnicity) experience a disproportionate greater housing need for almost all LMI levels for both types of housing needs (*housing problems and severe housing problems*), except for the income level at 50% up to 80% AMI. For *housing problems*, Black or African American and Asian households experience the disproportionate greater need while Asian and Hispanic households experience the disproportionate greater need when *severe housing problems* are considered. Interestingly, when households exceed the LMI threshold (80% AMI), Asian households experienced a disproportionate greater need when *housing problems* were considered. No such problem was noted for *severe housing problems*.

For households with income *less than 30% of the AMI*, Black / African American (84%), Asian (100%), and Hispanic (85%) households have disproportionate greater *severe housing* needs than the jurisdiction as a whole (70%).

The demographic summary, as noted in the County's AI, indicates that the County is not enormously diverse, given the small numbers of households by race and ethnicity within each income category.

Considering this assessment, the real disparities may not exist at all or could be larger than those indicated by the numbers.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The table below shows the extent of cost burden for Cherokee County as a whole and for each race and ethnicity. The first column is considered affordable housing with the housing cost burden coming in at 30% or less of household income. The table also shows households with cost burden between 30% - 50% and those with severe cost burdens, which are greater than 50% of household income. As each race/ethnicity is compared for a disproportionate greater need, the cost burden range, **30-50%**, reveals that American Indian, Alaska Native households have a disproportionately greater housing need at 40% compared to 17% for the jurisdiction as a whole. And, when severe housing cost burdens exist (>50%), Asian and Hispanic households are seen to have a disproportionately greater housing need having exceeded the jurisdiction by more than ten percentage points (28% and 29%, respectively, versus 14%).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	52,214	13,128	10,406	602
White	46,194	10,742	7,850	548
Black / African American	2,349	934	720	25
Asian	594	149	290	0
American Indian, Alaska Native	100	75	10	4
Pacific Islander	30	0	0	0
Hispanic	2,388	1,149	1,424	14

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2009-2013 CHAS
Source:

Discussion:

Data in Table 21 shows disparity in the number of households able to live in affordable housing. For Asian households (58%) and Hispanic households (48%), the rates fall short of the jurisdiction as a whole where 68% of households live in affordable housing. Similarly, 40% of American Indian, Alaska Native

households experienced a housing cost burden between 30% and 50% of income, compared to 17% of the county as a whole.

Hispanics were more likely to have severe cost burdens of 50% or more (29%) versus 14% for the County as a whole, but Asian households were not far behind at 28%.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Cherokee County is gradually becoming more diverse and according to the 2010 Census, 90% of the population identified themselves as white alone; 6% as Black; and 10% as Hispanic.

The data in the preceding tables provided by HUD present housing problems, severe housing problems, and cost burden compared to AMI. HUD considers a disproportional greater need to exist when the members of a racial or ethnic group experience housing problems at a greater rate (10 percentage points or more) than the population as a whole.

Housing problems are generally shared by all groups with the exception of Black/African American households experiencing a disproportionate share in all AMI categories: **0-30%** with 90% compared to 80%, **30-50%** with 90% compared to 75%, and **between 50-80%** with 78% compared to 62% for the jurisdiction as a whole. Other races experience a disproportionate share of housing problems for the Asian population as well: **0-30%** with 100% compared to the jurisdiction rate of 80% and **50-80%** with 77% of Asian households compared to 62% for the jurisdiction. Hispanic households saw disproportionate shares of housing problems at income levels **0-30%** (95% vs. 80%) and **30-50%** (89% vs. 75%), compared to the jurisdiction as a whole.

When comparing households with severe housing problems, Hispanics (85%) and Asian (100%) households experience severe housing problems greater than the County as a whole (70%) in the **extremely low income** category as well as the category **30-50%**, 79% and 63% (respectively) versus 51%, and **50-80%**, 36% and 40% (respectively) versus 24%. Black/African American households with severe housing problems had a disproportionately greater need (84%) at the income level **0-30%** compared to the jurisdiction as a whole (70%) and 61% at income level **30-50%** versus 51% for the jurisdiction.

When a household experiences a cost burden **between 30-50% of the AMI**, American Indian/Alaskan Native households are more likely to be burdened (40% versus 17% for the jurisdiction). Severe housing cost burden (more than 50% of AMI) exists for Hispanic households (29%) and Asian households (28%) as compared to the County as a whole (14%).

If they have needs not identified above, what are those needs?

The County has a great need for housing for the disabled.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The Black/African American population is primarily located along I-575 from Woodstock to Canton and in the southeastern corner along the Fulton County line.

The proportion of persons reported as Hispanic appears to be concentrated in the City of Canton. The areas located on the southern end of the County also have concentrations of Hispanic households.

NA-35 Public Housing – 91.205(b)

Introduction

Public housing in Cherokee County is provided through the Housing Authority of the City of Canton (HAC), an independent organization. The Housing Authority manages public housing units, but it does not handle Section 8 vouchers, which are administered by the Georgia Department of Community Affairs. The Housing Authority has 145 units of public housing on three campuses. Just over 50 of these are family units, with the remainder serving the elderly, individuals, and disabled persons. The overall condition of the units is good, with the Authority receiving an inspection score of 26 out of 40 and currently is addressing deficiencies throughout the year. The Housing Authority is undergoing a Physical Needs Assessment where inspections of all systems are taking place to evaluate electrical systems, plumbing systems, HVAC, etc. to prepare for rehabilitation at all three campuses. Renovations to kitchens and bathrooms were completed, and recently letters were sent to residents to clean up front and back porches to coincide with common area cleanup. The properties need fencing, gutter work, and trees trimmed or taken down. The Executive Director will address those needs as funding allows.

Public housing, initially surveyed in the fall of 2018, had 154 families on its wait list. The wait list was opened up October 4th, 2018 and accepted applicants for 2-, 3- and 4-bedroom units. Applications are accepted every Thursday from 8:00 am to 4:00 pm. The wait list had grown to 200+ families by February 2019. The greatest need is for 1-bedroom units with a 2-3 year wait time for availability. The community center located at the Shipp Street campus previously contracted with Feed My Lambs to provide daycare/preschool for residents. The contract ended in July 2018, and plans are underway to complete rehab of the center to bring in computers and host workshops, job fairs, and homeownership workshops by end of the year of 2018 or beginning of 2019.

The following Tables 22-25 were reported from the HUD Public Housing database. Table 23 shows the characteristics of the residents (income, average family size, length of stay, accessibility). According to Table 24 and 25, 81% of the residents are White and 19% are African American/Black with Hispanics making up 10% of the residents.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	145	0	0	0	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	13,450	0	0	0	0	0
Average length of stay	0	0	3	0	0	0	0	0
Average Household size	0	0	2	0	0	0	0	0
# Homeless at admission	0	0	1	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	26	0	0	0	0	0
# of Disabled Families	0	0	19	0	0	0	0	0

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Families requesting accessibility features	0	0	145	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	118	0	0	0	0	0	0
Black/African American	0	0	27	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	14	0	0	0	0	0	0
Not Hispanic	0	0	131	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The most significant need for tenants of public housing and applicants is wheelchair accessibility. The Authority was required to make less than one percent (1%) of the housing units wheelchair-accessible. Applicants on the waiting list are entered through a preference point. While wheelchair accessibility is the major need, the Housing Authority is often able to make some accommodations to address concerns such as grab bars for bathrooms, adequate egress/exit, handicapped-accessible ramps, and provision for stair transfers for those in need of single floor access.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The waiting list for the Canton Housing Authority was 154 families (Fall 2018), and the majority seeking housing are looking for 1-bedroom units (93). Families with children make up the balance of the wait list for other units. Forty-nine applicants await 2-bedroom units while eleven seek 3-bedroom units. One applicant is on the wait list for a 4-bedroom unit. The expected wait for 1-bedroom units is 2-3 years. A recent check in February revealed a wait list of over 200 plus families.

The immediate needs of public housing residents include assistance with transportation, healthcare, modifications for accessibility, and light housekeeping for the elderly and disabled.

How do these needs compare to the housing needs of the population at large

Similar to the population at large, elderly and disabled persons require housing which is accessible. They need housing with bathrooms designed or retrofitted for the needs of persons who are frail and/or physically challenged. Adequate egress/exit is required and must be accessible.

While independent living units have been developed in the County meeting many of these needs, they are often unaffordable to the elderly population on fixed income or persons with disabilities. Disabled persons risk losing Medicaid benefits if their income attains the level high enough to acquire market-rate housing and not pose a cost burden.

Discussion

The long waiting list for public housing is an indicator of the need for affordable housing in Cherokee County for both extremely low and low-income families, the elderly, and persons with disabilities.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Unsheltered homeless numbers are from the 2017 Unsheltered Point-in-Time Count as the 2018 unsheltered count was limited in scope and designed solely to test new elements in the count process. The next full unsheltered count for the Continuum of Care will be in January 2019. At the time of ConPlan preparation, HUD had not released analysis of 2018 PIT data. The estimates for totals per year, including the number of days a person experiences homelessness are based on HMIS data, limiting the population to just sheltered families.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	6	137	321	309	331	100
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	82	61	428	411	441	100
Chronically Homeless Individuals	5	6	18	17	18	100
Chronically Homeless Families	2	0	6	6	6	100
Veterans	6	0	16	16	17	100
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	3	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Data was provided by the Georgia Department of Community Affairs via email from CoC Program Manager.

Indicate if the homeless population Has No Rural Homeless
is:

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Persons in Households with Children rank second in the estimates of numbers of persons entering and exiting homelessness for the County. *Persons in Households with Only Adults* are estimated at 411 becoming homeless compared to 309 for *Persons in Households with Children*. *Persons in Households with Only Adults* exiting homelessness are estimated to be 441 compared to 331 for *Persons in Households with Children*. While not insignificant, the numbers of *Chronically Homeless Individuals and Families*, *Veterans*, and *Unaccompanied youth* are much lower in comparison to *Persons in Household with Children* and *Persons in Households with Only Adults*. Estimated days a person experiences homeless remains the same for all categories of homeless population types at 100 days.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	70	34
Black or African American	141	29
Asian	0	0
American Indian or Alaska Native	1	1
Pacific Islander	1	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	8	2
Not Hispanic	211	65

Data Source

Comments:

Data was provided by the Georgia Department of Community Affairs via email from CoC Program Manager.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The data obtained from the Georgia Department of Community Affairs, Continuum of Care Program Office, estimates the number of persons in households with adults and children experiencing homelessness on a given night is 143, with 137 of those persons being unsheltered and 6 of them sheltered. Veterans reported as homeless totaled 6 with all of them sheltered.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Black or African American homeless populations represent 61%, or 170 persons, of the homeless population, with 83% sheltered and 17% unsheltered. White homeless populations represent 38%, or 104 persons, of the homeless population, with 67% sheltered and 33% unsheltered. Other races reported as homeless included 2 American Indian or Alaska Native persons (1 sheltered and 1 unsheltered) and 1 sheltered Pacific Islander.

The homeless population is significantly represented by the Non-Hispanic ethnicity at 97% and only 3% reporting Hispanic ethnicity. Of the 276 persons reported homeless for Non-Hispanics, 211 were sheltered and 65 unsheltered. For the 10 persons reported as Hispanic and homeless, 8 were sheltered and 2 were unsheltered.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Black or African American homeless populations represent 61%, or 170 persons, of the homeless population, with 83% sheltered and 17% unsheltered. White homeless populations represent 38%, or

104 persons, of the homeless population, with 67% sheltered and 33% unsheltered. Other races reported as homeless included 2 American Indian or Alaska Native persons (1 sheltered and 1 unsheltered) and 1 sheltered Pacific Islander.

Discussion:

There is no emergency night shelter within the County, and according to MUST Ministries, Inc. - Cherokee, the county has the second highest number of homeless individuals in the Balance of State Continuum of Care. Cherokee Family Violence Center has 12 emergency beds for victims of domestic violence, and operated at 106% in 2016. Victims have had to seek shelter in Winder/Barrow County at Peace Place, Inc. as a result of insufficient emergency beds in Cherokee County.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

There are significant numbers of Cherokee County residents within various sub-populations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with mental, physical, or developmental problems, victims of domestic violence, and persons with alcohol or other drug addictions.

Describe the characteristics of special needs populations in your community:

According to the 2012-2016 ACS 5-Year Estimates, 12% of the population in the County was 65 and older. Looking at the lower age 15.2% of the population in Cherokee County was 62 and older. The number of seniors as a percentage of the total population will continue to increase over the next 20 years as the baby boomers age. The services demands will increase with the need for transportation, medical services, assistance with housekeeping and home upkeep, proximity to amenities, and accessible and downsized housing.

Frail Elderly refers to capabilities rather than age alone. The 2012-2016 American Community Survey 5-Year Estimates for Disability Characteristics identifies hearing, vision, cognitive, ambulatory, self-care, and independent living as the key disabilities. This data reflects ambulatory difficulty as the biggest difficulty (20.6%), followed by hearing difficulty (14.3%), independent living (12.0%) and cognitive difficulty (9.5%). It can be assumed that these percentages would increase dramatically the older the person becomes. Transportation to/from doctor appointments, household chores, grocery shopping and cooking are major needs of this population. The condition of the public infrastructure in the County makes mobility difficult for persons with disabilities because of lack of sidewalks and curb cuts in many residential areas. A major need for this population will be affordable group homes and in-home care services.

Persons with Mental, Physical and/or Development Disabilities and Persons with Alcohol or Drug Addictions

According to the Georgia Department of Behavior Health and Developmental Disabilities, the trend for housing for persons with developmental disabilities is to move away from group homes and look more at host homes and provide more intensive day programs and expanded hours for these programs. Persons with alcohol or drug addictions seek private sources for detoxification facilities and in-patient treatment is cost prohibitive to many of the LMI persons within the County. Outpatient

treatment programs are available but lack intensive treatment plans for persons seeking help and also are expensive. The County currently does not have a non-profit organization that meets this need.

The Cherokee County DUI/Drug Treatment Court is designed to coordinate substance abuse intervention with judicial support through an immediate sanctions and incentives process. Participant entry into the DUI/Drug Treatment Court is voluntary and charges will not be reduced or dismissed until successful completion of the Program. The DUI/Drug Treatment Court is a partnership among the Courts, the Solicitors Office, the Defense Bar, Law Enforcement, Probation Services, and local, licensed Substance Abuse Treatment Providers.

What are the housing and supportive service needs of these populations and how are these needs determined?

An aging population will require housing to meet its increasing needs, including senior housing as well as assisted living and nursing care facilities. Affordable housing with services (including case management), either onsite or made easily accessible with adequate transportation, is critical for all special needs populations. There are on-going needs for counseling and treatment (substance abuse and mental health), advocacy, and counseling for victims of domestic violence, and ongoing mental health services.

Access to services and employment is a barrier. Many LMI people without access to transportation, including many people with disabilities have difficulty getting to and from services and to and from employment. This is particularly difficult in early morning/late evening and weekends which is a requirement for many entry level and/or lower paying jobs.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

NA

Discussion:

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

There is a continued need to provide expanded and/or rehabilitated space for the non-profit organizations serving the most vulnerable of the County's population. The County began addressing this need in the 2009-2013 Consolidated Plan and will continue to address the needs of non-profit facilities. The needs to be met in the first year(s) of the Con Plan are currently contingent upon the fundraising of applicants for the 2019 program year. Applications for the construction of new space to expand services at a facility that serves developmentally disabled young adults who have aged out of the school system and require around-the-clock care; the construction of sidewalks and stormwater management improvements for one of the participating cities, and the acquisition of new space for an agency that preserves the County's historically significant treasures. Healthcare centers, youth centers, community centers, and child care centers were identified through the needs assessment survey. The County will seek to identify organizations that may be able to meet these needs. The prior Consolidated Plan addressed the expansion and renovation of one senior center and construction of a new center and does not consider this a high priority during this Con Plan period.

A non-profit, low cost/free health clinic opened to serve the uninsured and underinsured LMI residents of the County during 2012 and expanded its facilities by acquiring additional space with a CDBG investment. Long-term plans are to provide mobile services to LMI residents to address the challenge of inadequate transportation services in the County and provide services where the citizens who have the need reside. The County will consider the feasibility of supporting that mission.

How were these needs determined?

Public Service needs were identified through meetings, interviews, direct mail surveys to nonprofit agencies within the community, and funding requests. Non-profit service providers played an integral role in identifying the needs of the LMI residents they interact with on a daily basis. A Needs Assessment Survey is available on the County's CDBG page of the County website for public input from these surveys and are tabulated during the review process for determining needs throughout the planning cycle for the program. Surveys are also distributed at public meetings and hearings for a broad-based approach to obtain input. Survey responses from citizens, as well as nonprofit agencies, are considered when developing the Annual Action Plan and the 5-Year Consolidated Plan.

Describe the jurisdiction's need for Public Improvements:

Affordable housing tends to be located in the older sections of the Cities and the County where the infrastructure is aging and failing. In order to maintain a safe and healthy environment for these LMI homeowners, projects to address these issues may include storm water infrastructure improvements, sanitary sewer improvements, street improvements, and sidewalk installation projects. One of the

participating cities has a need for sidewalks and stormwater improvements and will be contingent upon the funding they are able to leverage the cost of the project.

How were these needs determined?

Public Improvements needs were identified through meetings, interviews, direct mail surveys to nonprofit agencies within the community, and funding requests. Non-profit service providers played an integral role in identifying the needs of the LMI residents they interact with on a daily basis. A Needs Assessment Survey is available on the County's CDBG page of the County website for public input from these surveys and are tabulated during the review process for determining needs throughout the planning cycle for the program. Surveys are also distributed at public meetings and hearings for a broad-based approach to obtain input. Survey responses from citizens, as well as nonprofit agencies, are considered when developing the Annual Action Plan and the 5-Year Consolidated Plan.

Describe the jurisdiction's need for Public Services:

Public services identified transportation as a major need for almost all segments of the LMI population – abused and battered spouses, youth services, health services, group homes for long term foster care, senior services, and developmentally disabled adults.

Services directed to special needs groups that serve neglected/abused children, homeless shelters/services, domestic violence and substance abuse services, health services, child care services, and youth services were identified as priority needs for public services.

How were these needs determined?

Public Service needs were identified through meetings, interviews, direct mail surveys to nonprofit agencies within the community, and funding requests. Non-profit service providers played an integral role in identifying the needs of the LMI residents they interact with on a daily basis. A Needs Assessment Survey is available on the County's CDBG page of the County website for public input from these surveys and are tabulated during the review process for determining needs throughout the planning cycle for the program. Surveys are also distributed at public meetings and hearings for a broad-based approach to obtain input. Survey responses from citizens, as well as nonprofit agencies, are considered when developing the Annual Action Plan and the 5-Year Consolidated Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The County has changed within the past 10 years having seen increases in population, housing, and employment. Complete recovery from the economic downturn of 2008 has not yet been reached but signs of recovery began in 2013 (Bar chart in attached table). Indicators such as the increase in building permits and the low unemployment rate corroborate the economic recovery within the County. Major commercial developments include Cabella's (major sporting goods store), the newly-constructed Northside Cherokee Hospital, Inalfa, Adidas, Papa John's Distribution, Campers Inn RV, and a phased shopping center development across from Canton Marketplace, with Phase I completed and most anchor stores in Phase II completed at the Canton Exchange.

The County's population has grown by nearly 75% since 2000 having numbered 141,903 and then reaching an estimated 247,573 for July 2017 [Source: ACS & Population Estimates Program, PD&R *Market at a Glance*]. Other notable trends within the County, according to the *Market at a Glance*, include labor force and resident employment figures and 3-month year-over-year rates of change. While the 3-month averages of each measurement have increased (measured at June of each year for 2016, 2017, and 2018), the rate of change is on a slight decline (see attached tables). This data, obtained from the US Bureau of Labor Statistics, also indicated an unemployment rate on the decline for the County, from 4.2% in June 2016 to 3% in June 2018.

Note, also, the housing inventory by tenure in the attached table and the vacancy rates comparing 2014, 2015, and 2016 ACS data to the 2010 Census. There was a slight downturn for percentage of homeowners from 2015 to 2016, and a slightly greater uptick in percentage of renters. With the most recent seller's market conditions for homeowners, the vacancy rate does not represent current market conditions for homeowners. Vacancy for apartment/rental homes, may be representative with the median contract rate at \$860 [Source: American Fact Finder, 2012-2016 American Community Survey 5-Year Estimates (B25058), *Median Contract Rent*].

Other market analysis included assessments of broadband service within the County as well as the vulnerability of the area to natural hazards. Three internet service providers were contacted (AT&T, Comcast, and Windstream) to make an assessment of the digital divide and determine what efforts were made to address any deficiencies and determine opportunities for community development efforts for the Con Plan. The Cherokee Office of Economic Development provides a map of broadband services in the County (see maps provided below). While there appears to be no areas in the county where service is not available, whether it is cable, fiber, DSL, or satellite, it does not appear that discounted services or free or discounted equipment is offered to LMI households.

Resiliency comments are found in the narrative following the broadband service maps.



Market at a Glance

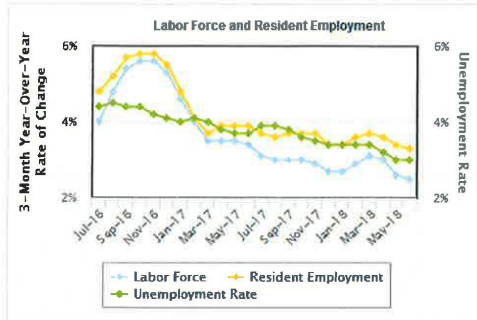


Cherokee County, Georgia

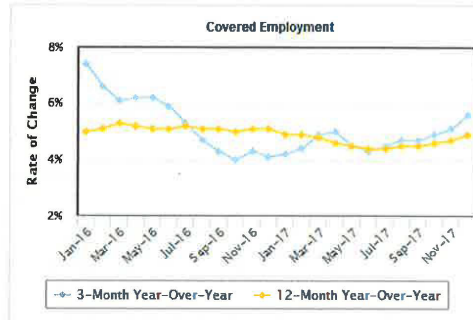
Prepared by: PD&R / Economic & Market Analysis Division (EMAD)
Southeast/Caribbean Regional Office

Created on: September 6, 2018

ECONOMIC CONDITIONS



Data Source: U.S. Bureau of Labor Statistics



Data Source: U.S. Bureau of Labor Statistics

	3-Month Average			3-Month Year-Over-Year Change			
	June 2016	June 2017	June 2018	June 2016 to June 2017		June 2017 to June 2018	
	Number	Percent	Number	Number	Percent	Number	Percent
Labor Force	125,463	129,711	132,990	4,248	3.4	3,279	2.5
Resident Employment	120,194	124,865	128,975	4,671	3.9	4,110	3.3
Unemployment Rate (%)	4.2	3.7	3	n/a	n/a	n/a	n/a
	December 2015	December 2016	December 2017	December 2015 to December 2016		December 2016 to December 2017	
	Number	Percent	Number	Number	Percent	Number	Percent
	Number	Percent	Number	Number	Percent	Number	Percent
Covered Employment	54,939	57,185	60,381	2,246	4.1	3,196	5.6

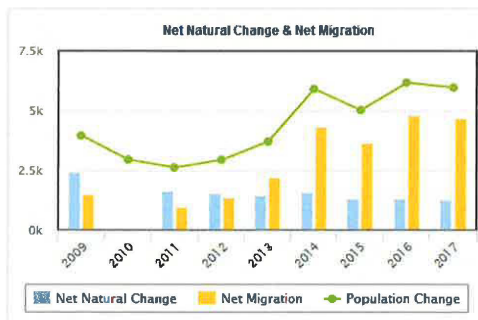
Data Source: U.S. Bureau of Labor Statistics

POPULATION & HOUSEHOLDS

	Decennial Census				ACS & Population Estimates Program						
	April 2000	April 2010	Average Annual Change		July 2015	July 2016	July 2017	2015 to 2016		2016 to 2017	
			2000 to 2010					Number	Percent	Number	Percent
			Number	Percent							
Population	141,903	214,346	7,244	4.2	235,424	241,600	247,573	6,176	2.6	5,973	2.5
Households	49,495	75,936	2,644	4.4	82,664	84,088	0	1,424	1.7	0	

Data Source: 1 - 2000 Census; 2010 Census; U.S. Census Bureau Population Estimates

2 - 2000 Census; 2010 Census; 2014, 2015 and 2016 American Community Surveys (1 - Year)

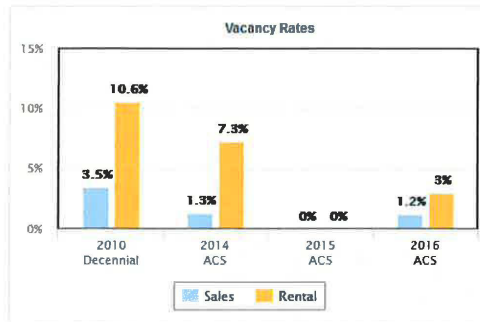


Data Source: U.S. Census Bureau Population Estimates

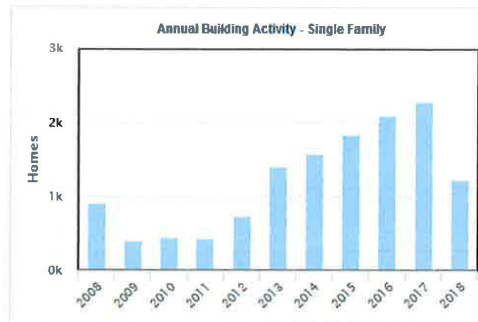
Notes: 1 - Values in chart reflect July year-to-year changes

2 - Net Migration includes residual population change

3 - Annual components of population change are not available for 2010



Data Source: 2010 Census; 2014, 2015 and 2016 American Community Surveys (1 - Year)

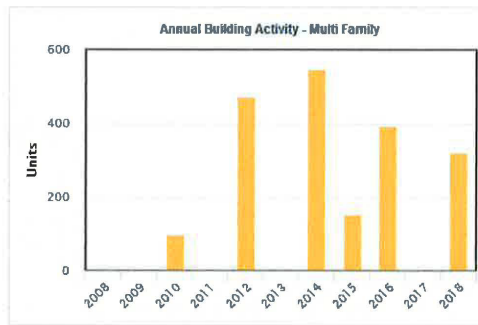


Data Source: U.S. Census Bureau, Building Permits Survey; adjustments by analyst

Note: Data for 2018 is preliminary, through June 2018

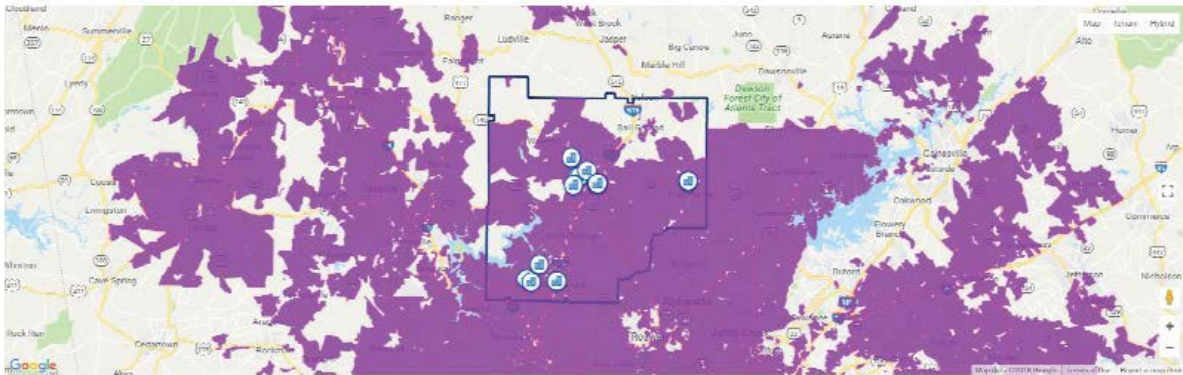
Housing Inventory by Tenure				
	2010 Decennial	2014 ACS	2015 ACS	2016 ACS
Total Housing Units	82,360	85,503	87,483	89,343
Occupied	75,936	81,991	82,664	84,088
Owners	60,400	59,733	64,648	64,737
% Owners	79.5	72.9	78.2	77.0
Renters	15,536	22,258	18,016	19,351
% Renters	20.5	27.1	21.8	23.0
Total Vacant	6,424	3,512	4,819	5,255
Available for Sale	2,204	793	n/a	755
Available for Rent	1,834	1,764	n/a	607
Other Vacant	2,386	955	n/a	3,893

Data Source: 2010 Census; 2014, 2015 and 2016 American Community Surveys (1 - Year)



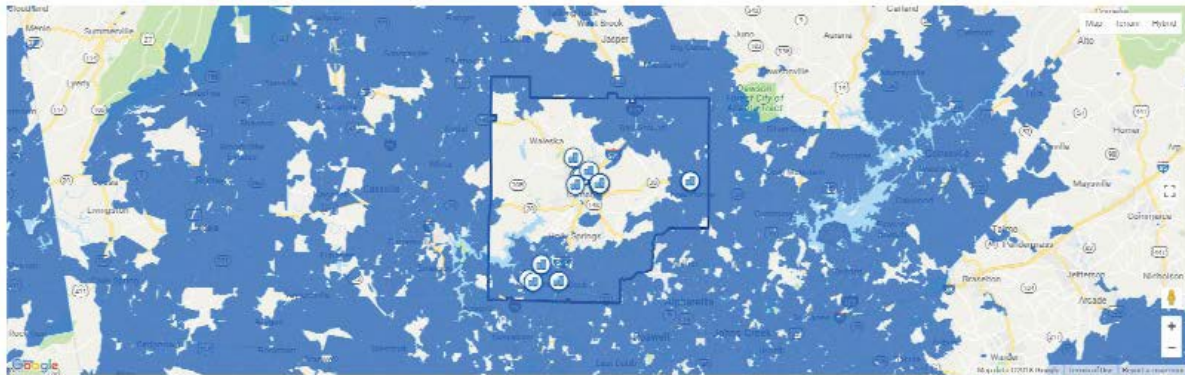
Data Source: U.S. Census Bureau, Building Permits Survey; adjustments by analyst

Note: Data for 2018 is preliminary, through June 2018



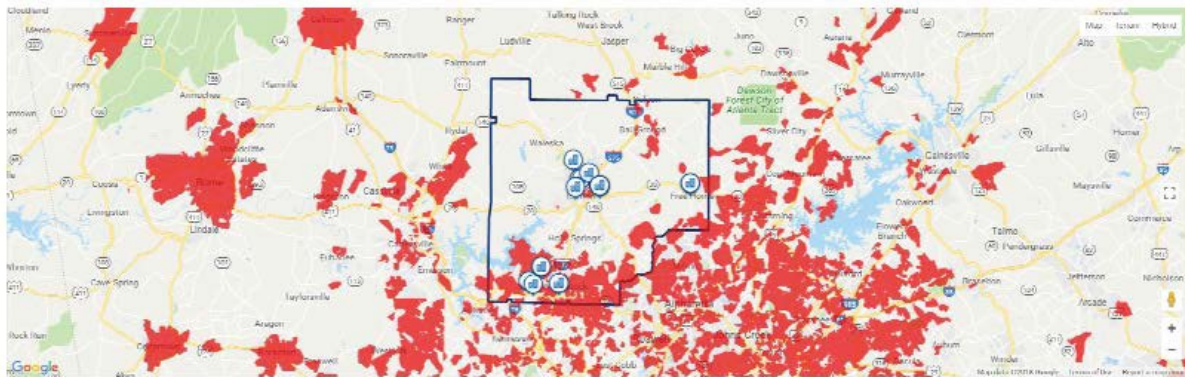
BROADBAND - CABLE

BROADBAND SERVICE AREA MAP-CABLE



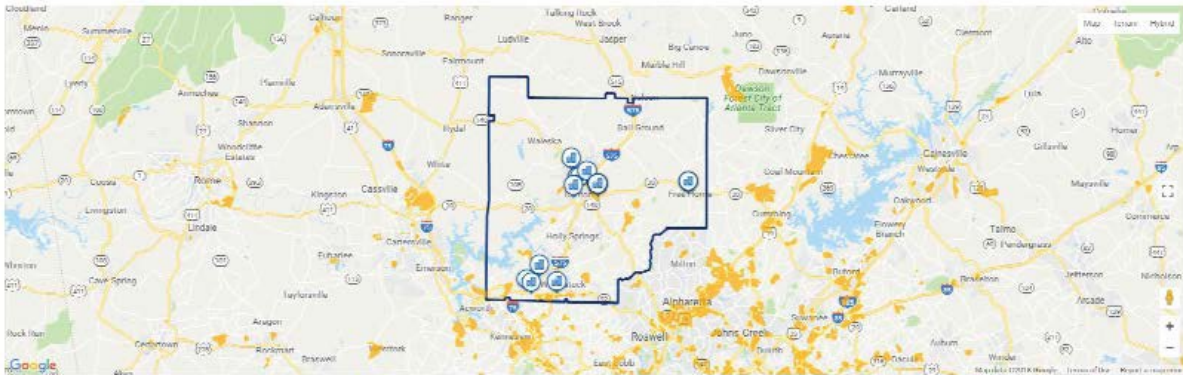
BROADBAND - DSL

BROADBAND SERVICE AREA MAP-DSL



BROADBAND - FIBER

BROADBAND SERVICE AREA MAP-FIBER



BROADBAND - OTHER COPPER WIRE

BROADBAND SERVICE AREA MAP-OTHER COPPER WIRE



BROADBAND - SATELLITE

BROADBAND SERVICE AREA MAP-SATELLITE



BROADBAND - ALL

BROADBAND SERVICE AREA MAP-ALL BROADBAND

Resiliency Assessment

In addition, the County's Emergency Management Agency (EMA) was contacted to determine resiliency status for the County and its vulnerability to natural hazards. Cherokee County Water and Sewerage agency was contacted as well since one of its primary responsibilities is the management of water resources within the county. The EMA has a hazard mitigation plan that is reviewed annually and updated every five years. The mitigation plan contains input from several agencies, including public safety agencies, resources management agencies such as public utilities, major employers, nonprofit agencies who provide human services, and a local university, to name a few. The HMP was prepared in 2010 and is in compliance with the Federal Disaster Mitigation Act of 2000, which provides benchmarks and criteria for communities with the vision to implement practices in their communities. Natural hazards are given a risk assessment with empirical data, and mitigation plans for preparedness and response and recovery are updated based on the risk assessment and loss/damage to asset potential. New to the most recent mitigation plan update (2015, for the period 2016-2021) was the addition of man-made hazards such as technological hazard-terrorism, technological hazard-communications failure, technological hazard-transportation incidents, and technological hazard-hazardous materials. The CDBG Program Office will partner with the Emergency Management agency to

determine where deficiencies exist in resources/funding for the County and participating cities in the implementation of the Hazard Mitigation Plan to accomplish the goals set forth.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

In addition to the ACS Data 2009-2013 in the table below, American Fact Finder was used to obtain the report *DP04 Selected Housing Characteristics: 2012-2016 American Community Survey 5-Year Estimates* for a more recent picture of the housing stock in the County. The data provided by HUD shows that there were 83,158 residential units in Cherokee County through 2013. The housing mix consists of significant portion of single family units (over 83% of the total housing units), more so than condos/townhomes or multifamily properties. Most of the multifamily units were in larger complexes, 5 or more units, representing 82% of the multi-unit properties.

Manufactured/mobile homes are a notable component of the housing stock with an estimated 3,335 units, increasing over the last ACS Data (2006-2010), provided by HUD, for the previous ConPlan at 3,235, and even higher in the most recent 5-Year ACS Estimate (2012-2016) at 3,447. While there are many scattered locations, the condition of manufactured homes and the sites on which they are located vary. Often these units are on individual sites and provide modestly priced housing for residents.

The **Unit Size by Tenure** table estimates that 79% of the units were owner-occupied and 21% renter-occupied. Over 91% of owner units had 3 or more bedrooms. A majority of renter units are split between 2 bedrooms (39%) and 3 or more bedrooms (50%).

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	68,828	83%
1-unit, attached structure	2,930	4%
2-4 units	1,477	2%
5-19 units	3,231	4%
20 or more units	3,357	4%
Mobile Home, boat, RV, van, etc	3,335	4%
Total	83,158	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2009-2013 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	58	0%	118	1%
1 bedroom	259	0%	1,632	10%
2 bedrooms	4,895	8%	6,297	39%
3 or more bedrooms	55,194	91%	7,918	50%

	Owners		Renters	
	Number	%	Number	%
Total	60,406	99%	15,965	100%

Table 28 – Unit Size by Tenure

Data Source: 2009-2013 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Public Housing in Cherokee County is provided by the Canton Housing Authority, which has 145 units on three campuses. Just over fifty of these units are family units, with the remainder serving the elderly, individuals, and handicapped persons. These units provide much-needed housing cost relief for low-to-moderate income households.

In addition to the safe and secure emergency shelter at Cherokee Family Violence Center (12 beds), the agency also operates a 72-unit gated apartment complex comprised of 2, 3 and 4-bedroom transitional housing for victims of domestic violence and their children living in Cherokee County. MUST Ministries, Inc. – Cherokee has 25 units of permanent supportive housing (total of 56 beds) to serve clients with disabling conditions that would prevent independent living. The program supports the most difficult to serve of the homeless population that include the chronically homeless, homeless, and veteran populations who suffer from addictions, mental illness, physical disabilities, or co-occurring disorders.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Housing Authority in Canton does not handle Section 8 vouchers, but that is administered by the State. At some level, there were some units of affordable housing lost to development in Holly Springs where a trailer park forced residents out.

There is a population of seniors that have found affordable housing in manufactured/mobile homes that are in trailer parks, but one of the trailer parks, the one located in Holly Springs, is being sold to a developer and forcing residents to vacate. Senior Services regularly receives calls for assistance in finding affordable housing options, and some are assisted with deposits for an apartment or relocated to other jurisdictions.

Does the availability of housing units meet the needs of the population?

As in most communities, affordable housing is very limited especially housing for the lowest-income households (at or below 30% of AMI). The available housing stock is generally older and in need of rehabilitation. According to the 2012-2016 American Community Housing Survey 5-Year Estimates, specifically housing characteristics, approximately 33% of the housing units in the County are homes

built over 20 years ago, and 4% represent homes 50+ years old. Homes built in the 90's total 22,855, so the number of homes built 20 years ago could be closer to 50% (for homes built 1990-1997).

Households **at or below 30% of AMI** often require assistance with rent and/or utilities as well as other basic needs. People living on low, fixed incomes, such as Social Security as the sole retirement benefit, or disability benefits are not able to easily find suitable, affordable housing. According to the 2010 census, Cherokee County's share of the state's total population living in poverty (1,645,272) was at 1% (or 17,855). For the County, the percentage of the population living in poverty is at 8.4% of the households, and they need assistance for suitable housing.

Housing requirements change as the senior population continues to age. Many seniors are looking to downsize and are looking for units that meet future needs. While there are units in the County that offer amenities that allow for single floor living, handicap accessibility, and transportation, many of these units are not affordable to the seniors living on a fixed income. Many households require modifications for accessibility for the seniors who want to age in place, and the County addresses this with the Minor/Emergency Home Repair program to the extent modifications amount to only \$5,000.

There is limited affordable housing for people with disabilities in general.

Describe the need for specific types of housing:

Housing prices in the County and its cities are considered affordable within the context of the Metro Atlanta Area region in which the County is located. A large proportion of the higher priced move-up homes and executive homes has been built within the last ten to fifteen years. The majority of new multi-family housing in the incorporated areas has occurred within the cities of Woodstock and Canton.

The economic slump from 2008, forward, weakened the construction of new owner and renter units in the County. The decline in permits from its high in 2005 continued through 2012 (1,213). By 2013, significant signs of recovery were noted, especially for unincorporated Cherokee County, but numbers haven't returned to the peaks seen between 2002-2006 for all of the Cities.

Much of the existing housing stock is older and many of these units are smaller making them affordable; however, there is concern about the condition of these homes. Rehabilitation of these older housing units brings concern about lead-based paint hazards and asbestos and ensuing requirements of abatement of such. Not all units are suitable for rehabilitation especially older manufactured homes. The County's strategy includes preservation of affordable housing in existing communities when possible.

Entry level housing for working households making 50%-80% of AMI continues to be a challenge with the increase in construction costs. Several survey responses from human service providers as well as citizen responses have indicated a great need for affordable and available workforce housing.

Discussion

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

According to the 2017 American Community Survey 1-Year Estimate, the median home value for Cherokee County is \$251,100. Despite this number being an estimate, it is \$60,700 more than the ACS data in the table below. The median value for the 5-Year estimate from ACS data (2012-2016) ranks at \$204,400, an increase of \$14,000. The 5-Year estimate of contract rent (2012-2016) comes in at \$860, a \$51/month increase over the data in the table below. The high cost of housing and the lack of affordable inventory are barriers to many. Persons who are coming out of homelessness, those precariously-housed, veterans, and persons returning to the community from institutions face the challenge of finding suitable, affordable housing and finding resources to meet move-in costs.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2013	% Change
Median Home Value	138,300	190,400	38%
Median Contract Rent	622	809	30%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,412	15.1%
\$500-999	9,235	57.9%
\$1,000-1,499	3,696	23.2%
\$1,500-1,999	424	2.7%
\$2,000 or more	198	1.2%
Total	15,965	100.0%

Table 30 - Rent Paid

Data Source: 2009-2013 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	478	No Data
50% HAMFI	3,190	2,354
80% HAMFI	9,553	10,511

% Units affordable to Households earning	Renter	Owner
100% HAMFI	No Data	16,964
Total	13,221	29,829

Table 31 – Housing Affordability

Data Source: 2009-2013 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	764	820	949	1,253	1,532
High HOME Rent	764	820	949	1,175	1,291
Low HOME Rent	607	650	780	901	1,005

Table 32 – Monthly Rent

Data Source Comments: FY 2016 FMR's and 2016 HOME Program Rents

Is there sufficient housing for households at all income levels?

The Housing Affordability table above estimates the number of units that are affordable for each of the HUD adjusted median family income levels (CHAS census data). Households with the lowest incomes – *at or below 30% of AMI* and those *below 50% of AMI* – lack affordable housing. The HUD data indicates there are 478 units with rents (including utilities) within the budgets of the households earning 30% or less of AMI and 3,190 (for renter households) and 2,354 (for owner households) for those households earning less than 50% of AMI. This data, as well as household data in the Housing Needs Assessment section (NA10), supports the need for suitable, affordable housing as there is an insufficient housing inventory to meet the needs of the lowest income renters and owners. Having a total number of household units at 83,158, a 31% affordability rate exists for the LMI households. It stands to reason that if the total number of units that are affordable at the specified income levels, above, is 43,050, and total housing units is 83,158 (52%), then there is not a sufficient amount of housing affordable to all income levels.

How is affordability of housing likely to change considering changes to home values and/or rents?

The housing market has seen a recovery and available inventory is tightening. According to the online magazine, *PD&R Edge*, the report of the Summary of US Housing Market Conditions: 1Q2018, all three major home price indices (Standard & Poor's Case-Shiller, Federal Housing Finance Agency, and CoreLogic) indicate that during the first quarter of 2018, home sales prices rose by about 7 percent relative to a year ago. Housing costs are not likely to decrease. New home construction costs are expected to continue to increase as well as fuel and transportation costs, factors influencing the cost of materials. Vacancy rates are on the decline, and the nation's foreclosure rate continues to

decline. More and more LMI households are finding themselves priced out of the new and existing homes market.

And, Fair Market Rent for an efficiency unit is \$873. A person making the minimum wage of \$7.25, working 40 hours per week would experience a severe cost burden (50%). If housing is available, households may have to opt for units in questionable condition. People with special needs, including those with disabilities may find themselves in units without accommodations and/or in locations that make it difficult to get to work and services.

The Analysis of Impediments to Fair Housing Choice, recently completed in April 2018, saw the County set as one of its fair housing goals the need to *Increase Availability of Affordable Housing*, and the County plans to promote LIHTC opportunities by contacting affordable housing developers working in the Atlanta area and support feasible LITC applications through letters of endorsement or investment of CDBG funds. There is no anticipated subsidized affordable housing in Cherokee County to alleviate the burden of housing for the low-income households, but the City of Woodstock is willing to partner with the County in efforts to get workforce housing constructed in the community.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The County no longer receives HOME funding, but Fair Market Rents, as well as High/Low HOME rents, were obtained from the HUD Economic and Market Analysis Division (HUD User) and the HUD Exchange. The area median rent, according to the 2012-2016 ASC estimates, is \$860, slightly higher than the amount shown in the Housing Cost table, above, and compared to the Fair Market rent [FY 2016] of \$949 for a 2-bedroom unit and \$1,253 for a 3-bedroom unit, comes in below the data. While the area median rent is a 5-Year estimate (2012-2016), the 2017 ACS estimate is more representative of rents in the jurisdiction (\$1,066). With median rent above the Fair Market rents for Efficiencies, 1-Bdrm, and 2-Bdrm units, production of additional units is needed to provide more affordable housing to increase the inventory of rental units.

Trend analysis from the online magazine and report referenced in the previous discussion concerning sufficient housing for households at all income levels indicates that apartment rents were up 4.4 nationally from a year ago (12-months ending March 31), with rents increasing in all regions.

Discussion

Considering there is not enough affordable housing in the County's housing stock, rising costs of rent and home values contribute to the barriers for access to affordable housing for LMI households. Increasing the number of affordable units is a goal of the County's.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Definitions

For the purpose of this Consolidated Plan, the County provides the following definitions for the terms “standard condition”, “substandard condition”, and “substandard but suitable for rehabilitation”. For units considered in “standard condition”, they must meet the HUD Section 8 housing quality standards. Substandard units are units that do not meet one or more of the HUD Section 8 housing quality standards. These units are likely to also have deferred maintenance, may have some structural damage such as leaking roofs or deteriorated interior surfaces. A unit is substandard if it is lacking the following: complete plumbing, complete kitchen facilities, and adequate heating systems.

Substandard but suitable for rehabilitation includes those units with some of the same features as substandard such as lacking complete plumbing, lacking complete kitchen facilities, and inadequate heating systems but has some infrastructure that can be improved upon.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	16,408	27%	7,201	45%
With two selected Conditions	285	0%	539	3%
With three selected Conditions	18	0%	85	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	43,695	72%	8,140	51%
Total	60,406	99%	15,965	100%

Table 33 - Condition of Units

Data Source: 2009-2013 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	23,543	39%	5,302	33%
1980-1999	28,041	46%	6,832	43%
1950-1979	7,836	13%	3,087	19%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Before 1950	986	2%	744	5%
Total	60,406	100%	15,965	100%

Table 34 – Year Unit Built

Data Source: 2009-2013 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	8,822	15%	3,831	24%
Housing Units build before 1980 with children present	13,389	22%	10,349	65%

Table 35 – Risk of Lead-Based Paint

Data Source: 2009-2013 ACS (Total Units) 2009-2013 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

Condition of Units, Table 33 above, summarizes the housing problems described in the earlier CHAS tables. Conditions include lack of complete kitchen or plumbing, overcrowding, and cost burden. In the earlier section of the plan, most of the housing problems are the results of cost burden. The ACS estimates that 16,408 (27%) of the owner households had at least one selected condition and only 303 had two or more selected problems. An estimated 6,666 (45%) renter households had at least one selected condition with 624 have two or more selected problems.

Growth of the population in the County has been noted since 1980. As the cost of housing rose in the surrounding counties of Cobb and Fulton, persons moved into Cherokee County for more affordable housing. The migration to Cherokee County resulted in a housing boom during the 1980-2000 period with 85% of the owner households built since 1980 and 76% of the rental units built after 1980.

Many of the older homes were constructed by the homeowner when the county did not have building codes. These homes were often built with scrap materials and substantial rehabilitation is required to bring these homes up to standards.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Risk of Lead-Based Hazard – Table 35 above provides an estimate of housing where lead-based paint may be a hazard (housing built prior to 1980). Included in this table is 22,211 owner units/13,389 with children present and 14,180 rental units. It can be assumed that rental units would be more likely to have children present. Units built prior to 1980 with children present are at a greater risk for elevated blood levels.

Discussion

Risk of Lead-Based Hazard – Table 35 above provides an estimate of housing where lead-based paint may be a hazard (housing built prior to 1980). Included in this table is 22,211 owner units/13,389 with children present and 14,180 rental units. It can be assumed that rental units would be more likely to have children present. Units built prior to 1980 with children present are at a greater risk for elevated blood levels.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Public housing in Cherokee County is provided through the Housing Authority of the City of Canton (HAC), an independent organization. The Housing Authority manages public housing units, but it does not handle Section 8 vouchers, which are administered by the Georgia Department of Community Affairs. The Housing Authority has 145 units of public housing on three campuses. Just over 50 of these are family units, with the remainder serving the elderly, individuals, and handicapped persons.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			145						
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The overall condition of the units is good, with the Authority receiving an inspection score of 26 out of 40 and currently are addressing deficiencies throughout the year. The Housing Authority is undergoing a Physical Needs Assessment where inspections of all systems are taking

place to evaluate electrical systems, plumbing systems, HVAC, etc. to prepare for rehabilitation to all three campuses. Renovations to kitchens and bathrooms were completed, and recently letters were sent to residents to clean up front and back porches to coincide with common area cleanup. The properties need fencing, gutter work, and trees trimmed or taken down. The Executive Director will address those needs as funding allows.

While the Housing Authority meets a critical need for affordable housing for low-income residents, it has an insufficient number of units (145) and funds to meet the full need for affordable housing in the County. Given limited funding for public housing, this condition is not likely to change.

The current waiting lists vary by size of the units:

1 BR: 93 applicants (expected wait is 2-3 years)

2 BR: 49 families

3 BR: 11 families

4 BR: 1 applicant

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The public housing units managed by the Canton Housing Authority recently received a 26 out of 40 inspection score, so the campuses are currently undergoing a Physical Needs Assessment to address deficiencies throughout the year. Inspections are being conducted on all of the systems to evaluate electrical, plumbing, HVAC, etc. to prepare for rehabilitation to all three campuses. Adjustments to the repair plan are made to respond to emergency problems encountered by residents.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

As a result of unusual turnover in the Executive Director position, the current Executive Director is working to restore faith and trust in the management of the communities. Office hours for Housing Authority have been extended to include more hours in the day on more days of the week. The Board has been completely revamped, and more than improving the mission statement and objectives, the Director has taken steps to become more transparent than previous directors.

Residents are surveyed annually to obtain their input on needs, and this information is used in preparing the PHA 5-year plan, which includes strategies for improving the environment of Housing Authority units. Currently, residents are being asked to tidy up front and back porches, where applicable, in concert with common areas cleaned by the Housing Authority. As previously mentioned, the physical deficiencies are being addressed as funding allows.

Housing Authority staff members meet periodically with residents to discuss conditions and Authority operations and to secure input for improvements to the community.

Discussion:

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

There are limited housing facilities to meet the needs of homeless persons living in Cherokee County. Housing resources and services are generally provided by non-profit organizations and churches within the community. There is one 12-bed emergency shelter and a 72-unit transitional housing apartment community for victims of domestic violence and their families. MUST Ministries, Inc. – Cherokee has 18 Permanent Supportive Housing units that serve the homeless and near-homeless families, individuals, and veterans with verifiable disabilities.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Nonprofit agencies and churches are able to provide services and healthcare for homeless persons and persons at risk of homelessness. Bethesda Community Clinic partners with Cherokee Family Violence Center to provide health services to the women and children housed in emergency and transitional housing. Mental health counseling and services in the community are insufficient to meet the needs as there is a shortage of treatment beds for persons with mental disorders and substance abuse.

MUST Ministries, Inc.'s Permanent Supportive Housing program assigns a case manager to persons entering their program and assists them in obtaining mainstream services. Employment services are available in the community for homeless persons as well as those at risk of homelessness. MUST Ministries provides a computer lab and work-clothes closet for persons seeking employment.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The County does not have emergency shelter housing for the homeless. MUST Ministries, Inc. - Cobb operates the Elizabeth Inn in Cobb County and often has individuals from Cherokee referred to the Cobb Campus. Mass transit services are not available, and the County's limited transit system does not travel beyond the bounds of the County. MUST Ministries, however, provides cab fare to the facility in Cobb County.

The **Cherokee Family Violence Center**, located in Canton, GA, provides emergency shelter (12 bed facility), crisis intervention, longer term transitional housing, case management services, transportation assistance, emergency financial assistance, support groups, children activities, and legal advocacy services to victims of domestic violence and their children living in Cherokee County. Due to the limited emergency shelter resources, victims are being referred outside of the County to facilities such as Peace Place, Inc. in Winder/Barrow County.

The **Cherokee Family Violence Center** established a Transitional Housing complex in 2005, comprised of 2, 3 and 4 bedroom units, where victims of domestic violence and their children can live for up to three years. It is one of the largest Transitional Housing programs of its kind in the United States. The rental structure is income based, with 80% of the units having Section 8 rental subsidies making it affordable for the families while rebuilding their lives.

Bethesda Community Clinic offers free acute and chronic medical care to residents of the County who lack access to medical care and whose income is equal to or less than 150% of the Federal Poverty Guidelines. Since medical expenses are a factor forcing many into homelessness, this clinic provides those most vulnerable the opportunity for health services. Bethesda also offers reduced cost to other uninsured or underinsured persons for a flat fee per visit.

Timothy House is located in Pickens County, north of Cherokee County, and it offers extensive programs for drug and alcohol recovery for both men and women. The programs are not residential and are offered for a fee of \$1,200 which must be paid for up front. This fee makes it unaffordable for the homeless or near homeless populations.

Bethany Place is located in Cherokee County and it provides food and shelter for women up to 18 desiring to turn their lives around. The residents are not allowed to seek employment while participating in this program.

Hope Quest, in Woodstock, offers two programs geared toward men and women struggling with alcohol or substance abuse.

Serenade Heights, Inc., located in Cherokee County, is a restoration ministry that provides supportive transitional housing to single mother families. They provide support, resources, and coaching to mothers in the area. And, they provide workshops for local single moms as well. Assistance is given to clients in the program to help find secure housing.

Jubilee Church Restore, in Woodstock, operates a food pantry to serve those in the community who are struggling with issues around homelessness. **Heritage Presbyterian Church**, in Acworth, also operates a food pantry and partners with Atlanta Community Food Bank to provide assistance in the southwest area of the County near the opportunity zone.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The County, through its Senior Services and Minor/Emergency Home Repair program for seniors, veterans, and disabled persons, provides assistance to the elderly, frail elderly, and veterans populations to maximize the duration of an independent living situation. The Cherokee Day Training Center and Next Step Ministries, Inc. are the primary providers of services for the mentally and developmentally (respectively) disabled adults in Cherokee County.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Seniors and the frail elderly have special needs for accessible and affordable housing. As they age, they need assisted living facilities, health services, and nursing care. The elderly often need assistance, case management services, health education, and caregiver support. Cherokee Senior Services provides case management services. The case manager designs an individual service plan and coordinates services through Cherokee County Senior Services and other community agencies, as needed. The case managers assist with housing assistance, financial assistance, legal referrals, medical equipment, home-delivered meals, light housekeeping, etc.

The **Cherokee County Senior Center**, through a congregate program, provides nutritious meals in addition to activities designed to provide social, mental, and physical stimulation. For seniors finding it difficult to drive or get out of the home, home-delivered meals services, as well as light housekeeping, grocery shopping, or light meal preparation are provided to the elderly who might be nutritionally at risk or have mobility issues limiting their ability to perform cleaning tasks in the home. Senior Services also provides transportation services to and from the services offered at the Canton location. Vouchers are also available to assist seniors with essential travel needs (physician appointments, etc.).

MUST Ministries, Inc. – Cherokee has a permanent supportive housing program that serves clients with a verifiable disability, which may include drug or alcohol addictions, not just a physical challenge. The program has 18 units with case managers assigned to each individual/family.

Cherokee Day Training Center is a non-profit in Cherokee County that provides persons with developmental disabilities access to typical life experiences and offers the individualized support necessary for obtaining employment, for developing skills, and for implementing personal choices.

Next Step Ministries, Inc. serves developmentally disabled persons who have aged out of the school system and require round-the clock care. The Therapeutic Day program allows parents to work while their young adult is being cared for at the facility. Clients are provided a personalized plan based on cognitive levels and higher cognitive abilities go through a job training program. Lower cognitive ability clients are taught basic life skills to enable families to go out in public and enjoy basic activities like eating in a restaurant.

Persons with severe mental health issues require specialized case management services, mental health counseling and, in some cases supportive housing offered in group home settings.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Currently there are not any programs for persons returning from mental and physical health institutions to receive appropriate supportive housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The activity that the County will support for next year to address the housing and supportive services needs is to provide staff support to MUST Ministries, Inc. – Cherokee for case managers in the agency's permanent supportive housing program. In addition to this goal for next year, MUST has expressed a need for obtaining more supportive housing units.

As part of the Consolidated Planning and annual planning processes, the County participates in a forum – Housing and Services Forum. This group brings together organizations that provide assistance in housing and homelessness, the church community, other non-profit organizations, and even includes a formerly homeless individual. One of the goals of this forum is to define the housing needs in the community and develop a plan to address these needs. Agencies often network to share resources and information.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

While this Consolidated Plan addresses the County's CDBG grant only, it is important to note the County no longer receives HOME funds as part of the Georgia Urban County Consortium, with Cobb County as Lead Agency.

The County partners with Habitat for Humanity to administer a Minor/Emergency Home Repair program to allow the elderly, frail elderly, and veterans populations to age in place as long as possible. Typically, with a limit of \$5,000 for repairs, the program address one of the major systems of the home: electrical, plumbing, HVAC, or roofs, but modifications may be made for accessibility. This program allows the seniors, veterans, and the disabled to age in place in a safer environment.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The cost of housing and utilities is not affordable to many owner and renter households, especially those earning less than 50% of AMI. There is a shortage of affordable housing units, and construction costs continue to rise. Provision for infrastructure is expensive as development extends to the areas that are not currently developed. Revenue for nonprofit housing developers has declined as a result of cutbacks at the federal level.

The Cherokee County Analysis of Impediments to Fair Housing Choice, April 2018, indicated that zoning laws were seen as significant impediments to the availability of affordable housing. This was mentioned as a particular problem for organizations trying to develop group homes for persons with disabilities. The requirement that group home occupants be ambulatory is one the AI recommended the County review and clarify. Also, the AI produced a goal to eliminate the minimum spacing requirements for group homes. In addition, the reasonable accommodations process was criticized and it was suggested that an ordinance be passed 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. The strongest recent interest in subsidized affordable housing construction has been limited to the senior/elderly population.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The County made use of the Cherokee Office of Economic Development data and information as well as Atlanta Regional Commission Economic Development information for assessing non-housing community development assets. In addition, information regarding non-housing community development assets was obtained from the County's 2018 update to the Comprehensive Plan.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	230	135	0	0	0
Arts, Entertainment, Accommodations	10,768	7,057	13	17	4
Construction	5,470	3,821	7	9	2
Education and Health Care Services	11,162	5,967	13	15	2
Finance, Insurance, and Real Estate	6,746	2,194	8	5	-3
Information	3,773	719	5	2	-3
Manufacturing	6,973	4,127	8	10	2
Other Services	2,841	1,804	3	4	1
Professional, Scientific, Management Services	11,258	3,000	14	7	-7
Public Administration	0	0	0	0	0
Retail Trade	12,715	8,778	15	22	7
Transportation and Warehousing	3,074	456	4	1	-3
Wholesale Trade	7,696	2,625	9	6	-3
Total	82,706	40,683	--	--	--

Table 40 - Business Activity

Data Source: 2009-2013 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	114,358
Civilian Employed Population 16 years and over	105,162
Unemployment Rate	8.04
Unemployment Rate for Ages 16-24	21.58
Unemployment Rate for Ages 25-65	5.40

Table 41 - Labor Force

Data Source: 2009-2013 ACS

Occupations by Sector	Number of People
Management, business and financial	28,765
Farming, fisheries and forestry occupations	4,028
Service	9,052
Sales and office	30,520
Construction, extraction, maintenance and repair	9,013
Production, transportation and material moving	5,439

Table 42 – Occupations by Sector

Data Source: 2009-2013 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	44,728	47%
30-59 Minutes	35,862	38%
60 or More Minutes	13,773	15%
Total	94,363	100%

Table 43 - Travel Time

Data Source: 2009-2013 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	7,123	770	3,826

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	19,010	1,877	6,223
Some college or Associate's degree	28,913	2,090	7,020
Bachelor's degree or higher	35,000	1,760	6,775

Table 44 - Educational Attainment by Employment Status

Data Source: 2009-2013 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	751	1,424	1,318	1,744	1,608
9th to 12th grade, no diploma	2,979	1,865	1,604	3,764	2,590
High school graduate, GED, or alternative	5,301	5,827	6,942	14,341	7,126
Some college, no degree	6,805	6,606	8,818	13,602	4,358
Associate's degree	449	1,743	2,596	4,686	1,132
Bachelor's degree	1,009	7,570	9,870	13,799	3,209
Graduate or professional degree	22	2,200	4,231	5,865	1,896

Table 45 - Educational Attainment by Age

Data Source: 2009-2013 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,908
High school graduate (includes equivalency)	29,931
Some college or Associate's degree	38,623
Bachelor's degree	56,183
Graduate or professional degree	65,705

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2009-2013 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Cherokee County has four major employment sectors: 1) retail trade (22% of jobs as of the 2009-2013 ACS), 2) Arts, Entertainment, Accommodations (17% of jobs), 3) Education and Health Care Services (15% of jobs), and 4) Manufacturing (10% of jobs).

The Education and Health Care Services sector boasts the largest employer. Northside Hospital – Cherokee is the largest employer with 2,145 employees; Inalfa Roof Systems (advanced automobile roofing systems/advance manufacturing) employs 1,000 people; Pilgrim’s Pride (poultry processing) employs 760, Chart Industries, Inc. (stainless steel cylinders, biomedical), employs 715; Piolax Corporation (manufacturer of automobile parts) employs 615; Universal Alloy Corporation (aluminum extrusion/aerospace) employs 559; Belnick, Inc. (office furniture distribution) employs 490 people; Meyn America, Inc. employs 267 (manufacturing & distribution), and Roytec Industries employs 250 (electrical wire assemblies); Schoen Insulation Services, Inc. (machined, non-metallic parts); and Papa John’s Quality Control is a regional hub that employs 145 people. [Cherokee Office of Economic Development website, www.cherokeega.org]

Describe the workforce and infrastructure needs of the business community:

Data from the Business Activity table suggests that there are more workers than jobs by 42,000, and scrutiny of each sector bears witness to the mismatch of workers to skills and job capacity. There is an excess of workers in all sectors compared to jobs. The Brain Drain phenomenon might explain this gap with nearly 80% of the residents commuting outside the county for jobs. (COED, *Collaborative Strategic Implementation Plan*, Jan. 2017). Other factors to contribute may be explained by the economic downturn that occurred in 2008 and the County is still experiencing residual effects.

Table 41 indicates that unemployment in the County is at 8.04%; however, the County’s 2018 update to the Comprehensive Plan cites an unemployment rate of 3.4% for January 2018 (US Bureau of Labor Statistics), compared to the metro area unemployment rate of 4.3%.

Data obtained from COED indicates that nearly 44% of residents have a post-secondary degree making the county attractive to white collar employers to relocate to the area and recruit workforce. A Regional Snapshot released by the ARC (Atlanta Regional Commission) shows that Cherokee County leads the second highest quartile of metro counties in change in employment, or job growth, with a projected 52% increase, one percentage point below two counties at the bottom of the top quartile (53%) and nineteen percentage points below the projected leader, Paulding County, in growth in the number of jobs from 2015 to 2040 (*Series 15 forecasts, ARC, 2015-2016*).

In terms of infrastructure needs, the downtown area of Canton, the county seat, has a need for parking improvements, sidewalks, and street lights. In addition, the county operates a transit system with transit buses that operate on a limited schedule. There is one fixed route that operates a limited number of hours and the balance of the fleet of 20-passenger buses operates an on-demand service for citizens needing to be transported to doctor appointments, seniors to the Senior Center, and disabled adults to the Day Training Center. Aged or aging housing units in areas/neighborhoods do not have

sufficient sidewalks, curbs, or drainage. And, some of the smaller cities within the County have aged and/or failing water and wastewater management systems.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Cherokee Office of Economic Development, in partnership with the Carl Vinson Institute of Government, created a group that included leaders from business, economic development, education, workforce, and the community to listen to companies, analyze data, and prioritize issues. **Cherokee Workforce Collaborative** used the data and industry feedback to assess the County's workforce with a SWOT analysis (strengths, weaknesses, opportunities, and threats). As a result of the collaboration and analysis, strategic goals and action items were developed to address the workforce challenges and talent gaps that were identified. The roadmap of strategies and goals was developed in 2017 in the *Cherokee Workforce Collaborative Strategic Implementation Plan*. Among the issues identified within the workforce climate were improved communication between industry, education, and other community partners, limited public transportation and infrastructure, brain drain (difficult to keep graduates in the area), lack of critical soft skills such as punctuality and customer service, differing expectations of younger workers regarding flexibility of work schedule and relaxed work environment; job hopping, and negative perceptions of certain jobs or industries by potential workers, current students, and parents. The collaborative developed four priorities to grow and retain local talent to meet current and emerging workforce needs: internships, innovative career preparation, business and education alliances, and sustaining the momentum and aligning resources. Each of the goals has action plan items and measures of success associated with them to ensure the workforce climate is improved through this implementation plan. Finally, the expected outcomes are: Cherokee County is more competitive, talent is developed locally, stronger partnerships between education and business are built, students graduate with a higher level of skills and work experience, and Cherokee County has the strongest workforce supply chain in Georgia. A robust pipeline of skilled workers and systematic support of business and industry will help attract companies seeking talent while also retaining skilled workers already within the county. Responsible parties include the Cherokee County School District, Chamber of Commerce, and the Development Authority.

A few major changes have occurred since the last ConPlan was developed. The major business sector, healthcare services, saw the opening of a newly-constructed Northside-Cherokee Hospital in May 2017 and subsequent expansion of the facility to add 13 medical/surgical beds and a second expansion to add two new floors, eight medical/surgical beds, and two shared operating rooms and modifications to the Women's Center. The new building replaced a 245-bed facility located on Hospital Road in Canton that had inadequate Emergency Room services. Other recent commercial developments include Cabella's (major sporting goods store), Inalfa, Adidas Speedfactory, Papa John's Distribution, Campers Inn RV, and a phased shopping center development across from Canton Marketplace, with Phase I completed and

most of the anchor stores in Phase II completed at the Canton Exchange. With the increase in jobs, improved and increased transportation options become an even more critical need for the County.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Cherokee County's residents make up a workforce that amounts to 42% having a post-secondary education according to COED. Cherokee County's major sectors of business include *retail trade; arts, entertainment, accommodations; education and healthcare services; and manufacturing*, but all sectors fall short of supplying jobs for the workforce. The skill and education of the workforce are not well matched with employment opportunities. The number of workers outnumbers the amount of jobs by 42,023. This substantially explains the out commute rate of 80% (COED). COED remains optimistic about job growth as a recent Regional Snapshot released by the ARC (Atlanta Regional Commission) shows that Cherokee County is projected to have strong job growth, landing at the top of the second quartile of counties in the Atlanta region over the next 25 years (2015 – 2040) with a 52% rate and 19 percentage points below the leader, Paulding County.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Please see the comments regarding Cherokee Workforce Collaborative, above, for workforce development initiative.

The Cherokee Office of Economic Development drafted the county's economic development plan, Opportunity Cherokee, in 2015. The plan included interviews, surveys, and group discussions with 2,400 participants and highlighted the county's assets that make it an ideal employment center. The plan also included strategies for creating jobs and attracting people to live and work in Cherokee. Five target markets were identified as areas the County should focus on expansion: Advanced Manufacturing, Commercial Developers, Information Technology, Corporate Operations, and Film & Media. The plan expands on the County's Comprehensive Plan, providing a more specific overview of existing industries and strategies to grow jobs in the target markets to keep residents from commuting outside the county. The economic development plan emphasizes the importance of education and job training programs to promote a strong workforce and the importance of entrepreneurial programs that will cater to potential and current business owners. Key initiatives

- Enhance COED's organizational capacity;
- Advance marketing and communication endeavors;
- Continue to expand business retention and recruitment activities;
- Create a culture for entrepreneurs; and
- Establish dynamic quality of place.

Cherokee County participates in a work ready program known as Georgia Work Ready. **Be Work Ready** is a one-of-a-kind initiative providing unemployed Georgians a monetary incentive for earning a Work Ready Certificate and/or improving their skills through free, online Work Ready skills gap training. The incentive, in the form of a pre-paid card, is to be used to offset job search expenses. In order for disadvantaged and low-to-moderate income persons to improve their economic status, job training and educational opportunities must prepare them for more competitively-compensated jobs.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Cherokee County does not participate in a Comprehensive Economic Development Strategy. There are two economic development offices within the county that develop plans and initiatives to impact economic growth. See *major changes that may have a significant economic impact* (above). COED hired a Workforce Program Manager in 2017 to help implement the strategies and goals of the Cherokee Workforce Collaborative Strategic Implementation Plan.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Concentration, in the context of housing problems, indicates there is a prevalence of occurrences in a particular census tract at a rate of significance. Here, that rate is 40%. The County's AI (April 2018) revealed two census tracts in Canton and one census tract in Woodstock where more than 40% of households have a housing need. 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 the 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 the county residents. African Americans also make up higher shares of the population in two Canton block groups (about 9%), compared to 5% throughout the 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 Columbian immigrants are more likely to live in the Woodstock tract.

In general, the needs assessment indicated that cost burden was the largest problem especially with renters below 50% of the AMI and owners up to 80% of AMI. Older housing with multiple housing problems are located throughout the County as is evidenced by the applicants to the Minor/Emergency Home repair program. Although the program typically addresses one of the major systems in the home, an assessment of repair needs in the home is performed by Habitat for Humanity.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

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 4 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population.

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

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%). Black/African Americans account for

6.5% of the population profile according to ACS Data 5-Year Estimates for 2012-2016. Three tracts in Canton are also relatively diverse, with white populations ranging from 66-72%, Black from 5-9%, and Latinos from 18-23%. Overall the Hispanic population accounts for 9.9% of the population profile noted in the ACS Data 5-Year Estimates for 2012-2016.

Cherokee County qualifies under HUD's exception rule for LMI qualification (44.2%). This exception takes into account the lack of concentration of LMI populations. However, the majority of the LMI census tracts are located around the Cities.

What are the characteristics of the market in these areas/neighborhoods?

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%) 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 42.46% of households rent and a census tract in southwest Cherokee County where 48.88% of households do.

The housing in these areas is generally older and considered affordable but lack sidewalks and lighting. The infrastructure (water, sewer) is aging and in need of upgrade and/or replacement. Retail and fast food establishments surround these communities.

Are there any community assets in these areas/neighborhoods?

A fixed route bus is available for limited hours through the City of Canton providing services for the residents to have access to needed services (doctors, shopping, human services service providers). The recent openings of a shopping center in the City of Canton, a regional hospital in Canton, and manufacturing facilities in the southwest portion of the county (an opportunity zone) will provide additional employment opportunities.

Are there other strategic opportunities in any of these areas?

To maximize the update to the County's Comprehensive Plan, the Planning & Zoning Department sought to incorporate other major plans and initiatives, which cover transportation, green space, and economic development. Two plans/initiatives that might benefit these areas, not excluding the 5-year economic development plan for the county [*Opportunity Cherokee 2015*], are the Bells Ferry LCI plan and SW Cherokee Redevelopment Plan. The Bells Ferry LCI plan was born out of a Livable Centers Initiative (LCI) grant received from the ARC to study land use and transportation in the Bells Ferry Corridor, a three-mile stretch of Bells Ferry Road starting near the Cobb County line (in 2005). A major priority of this plan is to develop "greyfield" commercial areas and to create a gateway to Cherokee County that provides shopping, basic needs, and housing. The plan for Bells Ferry, an area designated as its own character

area, developed guidelines within the following categories: Community Character, Transportation, Land Use, and Economic Development. Key initiatives include: create a “sense of place” and a unique identity for the community; improve traffic flow and vehicular circulation through the area; promote mixed-use development that offers live/work/play environments; and attract additional businesses and employers to the area that provide diverse jobs and enhanced tax base. The Bells Ferry Corridor separates unincorporated Woodstock from unincorporated Acworth in the south/southwest area of the county.

The SW Cherokee Redevelopment Plan was drafted in 2009 to address the needs of the area that has in it the Southwest Cherokee Opportunity Zone, the boundaries of which are Cobb County, Bartow County, and the intersection of Highway 92 and Woodstock Road. It is a state-designated Opportunity Zone that provides tax relief to employers and property owners who establish businesses within the boundaries to spur job growth. The plan highlights issues that this area faces such as the underutilization of developable land, deteriorating commercial buildings, the overall lack of tax revenue generation, and high demand for services to address disinvestment and blight.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Cherokee County conducted a needs assessment through a survey mailing to community stakeholders and provided surveys to citizens and participants through public meetings. And, a market analysis was conducted as part of the process to develop the County's needs. Hearings, interviews, consultations with the Community Housing Conversation group, and survey responses helped to establish the priority needs and to develop long term goals and strategies. Through this process, an overall focus for CDBG activities will be of assistance to the most vulnerable populations - households with incomes at and below 80% of the AMI, persons with disabilities, veterans, and the elderly.

The following goals and strategies were established for the five-year Strategic Plan to guide the County's allocation of CDBG funds for 2019-2023.

Increase the Capacity of Public Facilities and Infrastructure

- Improve residential neighborhood safety and livability by expanding/improving public facilities and infrastructure
- Increase services for low to moderate income persons by expanding/improving public facilities

Increase the Capacity of Public Services and Economic Opportunities

- Provide critical services for low income persons, homeless persons, and other persons with special needs to assist them toward increased stability

Preserve and Expand Affordable Housing

- Improve sustainability of homeownership and address substandard housing through a minor/emergency home repair program
- Expand the supply of affordable housing
- Expand the supply of affordable rental housing
- Reduce lead-based paint hazard
- Encourage fair housing opportunities

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	Countywide LMI persons/households
	Area Type:	Projects serving persons meeting LMI criteria
	Other Target Area Description:	Projects serving persons meeting LMI criteria
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	The City of Woodstock
	Area Type:	Infrastructure LMI neighborhoods
	Other Target Area Description:	Infrastructure LMI neighborhoods
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
3	Area Name:	The City of Nelson
	Area Type:	Other
	Other Target Area Description:	Other
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
4	Area Name:	The City of Ball Ground
	Area Type:	Infrastructure in LMI communities
	Other Target Area Description:	Infrastructure in LMI communities
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
5	Area Name:	The City of Canton
	Area Type:	Infrastructure in LMI neighborhoods
	Other Target Area Description:	Infrastructure in LMI neighborhoods
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Cherokee County does not intend to designate or target specific areas for allocation of funds as part of its strategic use of CDBG funds. There are opportunities through the cooperating cities to provide benefit to low and moderate income neighborhoods, and any base for allocation of funding would be an unfair meting of funds. Instead, Cities are asked to bring their shovel-ready projects to the County's grant application process. Allocations will support efforts to improve neighborhoods through public improvements to the infrastructure of the Cities.

There is a good collaboration of services with the non-profits in the County. There is little overlap on the services provided to the most vulnerable of the County's population and therefore each serves the geographical boundaries of the County.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Physical Disabilities
	Geographic Areas Affected	Projects serving persons meeting LMI criteria
	Associated Goals	Eliminate Substandard Housing Access to Affordable Housing Planning & Administration
	Description	Affordable Housing, especially households who are cost burdened, was identified as a need through the Needs Assessment section and through the intentional direct-mail surveys to stakeholders. Cherokee County will utilize 20% of funds for the acquisition of lots to develop affordable housing and partner with Habitat for Humanity to administer a minor/emergency home repair program. Seniors, veterans, and disabled persons are targeted beneficiaries for the repair program. Homes that are rehabbed, will be abated for lead and asbestos as required. Modifications may be made to the home for accessibility improvements. A secondary benefit of this program is after the senior no longer resides in the home, the home remains part of the affordable housing inventory and is safe for families with children or persons with physical disabilities.
	Basis for Relative Priority	In addition to the Analysis of Impediments to Fair Housing Choice (April 2018), the Needs Assessment section of the Consolidated Plan, the intentional direct-mail surveys to community stakeholders and the subsequent responses, regular meetings with the group "Housing and Services and Forum", non-profit organizations' input, and the needs assessment survey responses from citizens all identified the need for affordable housing.

2	Priority Need Name	Non-housing Community Development- Public Facility
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Families with Children veterans Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development Other
	Geographic Areas Affected	Projects serving persons meeting LMI criteria
	Associated Goals	Increase Capacity of Public Facilities Planning & Administration
	Description	<u>Increase the Capacity of Public Facilities.</u> The County has a need to provide expanded/or rehabilitated space for organizations that serve the most vulnerable of the County's population. This plan will seek to address the identified needs of organizations that serve abused/neglected children and the most vulnerable populations. Youth Centers, Child Care Centers, Senior Centers, Healthcare Centers, and Community Centers were identified as needs within the County. The County anticipates allocating about 40% of the funding to address these facilities that will serve the LMI residents.

	Basis for Relative Priority	Public facility needs were identified through meetings, interviews, and funding requests from the cities and nonprofit agencies in the county. Non-profit service providers played an integral role in identifying the needs of the LMI residents they interact with on a daily basis. An on-going needs assessment survey is available for public input on the County's website as well as at public meetings and responses were tabulated for identification of needs. In addition, an intentional mailing to nonprofit agencies and cities solicited input for unmet needs in the county.
3	Priority Need Name	Increase Capacity of Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Other
	Geographic Areas Affected	Projects serving persons meeting LMI criteria
	Associated Goals	Increase Capacity of Public Services Planning & Administration

	Description	Public services provide critical services for the LMI persons, persons with special needs, and homeless persons to obtain stable and sustainable living environments. Transportation was identified as a major need for almost all segments of the LMI population including youth centers, health services, group homes for long term foster care, senior services, supportive housing program participants, and developmentally disabled adults. The County anticipates using the full extent of the public service cap (15%) to address needs of the low-to-moderate income population in the county.
	Basis for Relative Priority	Public services needs were identified through meetings, interviews, and funding requests. Non-profit service providers played an integral role in identifying the needs of the LMI residents they interact with on a daily basis. An on-going needs assessment survey is available for public input on the County's website as well as at public meetings and responses were tabulated for identification of needs. In addition, an intentional mailing to nonprofit agencies and cities solicited input for unmet needs in the county.
4	Priority Need Name	Non-housing Community Development - Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	Geographic Areas Affected	Projects serving persons meeting LMI criteria
	Associated Goals	Increase Capacity of Public Improvements Planning & Administration

	Description	<u>Improve residential neighborhood safety and livability by expanding/improving infrastructure.</u> Affordable housing tends to be in the older sections of the cities and the county where the infrastructure is aging, failing, or not available. In order to maintain a safe and healthy environment for these LMI homeowners, projects to include storm water infrastructure improvements, street improvements, and sidewalk installation projects have been identified as community needs. The County estimates that 10% of the CDBG funding will address infrastructure improvements.
	Basis for Relative Priority	Public improvements through infrastructure needs were identified through meetings, interviews, and funding requests from the cities in the County. Non-profit service providers played an integral role in identifying the needs of the LMI residents they interact with on a daily basis. An on-going needs assessment survey is available for public input on the County's website as well as at public meetings and responses were tabulated for identification of needs. In addition, an intentional mailing to nonprofit agencies and cities solicited input for unmet needs in the county.

Narrative (Optional)

The County considers all four of these needs significant priorities for improving the community. Transportation and affordable housing, by far, are the most reported survey responses obtained through citizen and stakeholder input. While the economic landscape has been improving in recent years, the affordable housing stock is dwindling and creating cost-of-living challenges for the workforce. The transportation system operated within the county does not meet the needs of persons needing transportation to work, services, and community amenities. The County will employ strategies to meet these critical needs within the jurisdiction.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The County does not receive HOME funds.
TBRA for Non-Homeless Special Needs	The County does not receive HOME funds.
New Unit Production	The County's Analysis of Impediments to Fair Housing Choice produced a goal for addressing affordable housing. That goal is to contact affordable developers working in the Atlanta area to promote LIHTC opportunities in the County and provide letters of support for developers' applications or CDBG investment of funds.
Rehabilitation	Aging housing stock and scarce affordable housing units will impact the use of funds for minor/emergency repairs owned by seniors, veterans, and disabled persons.
Acquisition, including preservation	Scarce affordable housing units allow the County to fund the acquisition of lots for development of affordable housing by a housing partner. Recent new housing developments in the County are priced way beyond the resources of LMI households.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The activities included in the plan do not generate program income and therefore the County does not expect to receive program income.

The County does not receive HOME Program funding, so affordable housing needs will be addressed with the use of CDBG funds. Approximately \$230,000 to \$300,000 will be allocated each program year to address affordable housing needs.

The same assumptions were used for the available resources for the Action Plan. The activities included in the plan do not generate program income and therefore the County does not expect to receive program income.

Because the HOME consortium that the County was part of during some of the last Con Plan period disbanded, HOME funds are no longer available to the County. Instead, affordable housing needs are addressed through a Minor/Emergency Home Repair program and the acquisition of lots to develop affordable housing. The repair program is administered by Habitat for Humanity – North Central Georgia and it receives an annual allotment of \$100,000. Funding for lot acquisitions is based on available funds remaining from other agencies' requests for funding of public services and capital projects and a prioritization of needs.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,254,884	0	1,605,384	2,860,268	4,800,000	Expected amount available remainder of the Con Plan assumes an allocation of \$1.2 M for each of the next four years. Prior year resources are the result of committed funds for projects not yet finished by the end of the program year (\$891,861) and uncommitted funds from prior year projects not yet begun (\$713,523).

Table 50 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funds do not require a match, but the County does require that subrecipients provide a minimum of 10% of the activity cost from non-federal sources. i.e., private donations and fund-raising activities. Funding for infrastructure activities is often leveraged with local and state funds.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The County's Senior Services Center is publicly-owned, and it will continue to serve the needs of the senior citizens of Cherokee County. An expansion project funded with prior year resources was begun in program year 2018, and the expansion will allow the facility to expand services to reach more clients ranging for home-delivered meal recipients to seniors under the care of a case manager.

In addition, the County will fund the acquisition of property used to benefit homeless and near-homeless persons who enter the supportive housing program with MUST Ministries to reach stability and gain mainstream benefits. Other property to be acquired will be a building for the Cherokee County Historical Society to improve the neighborhood amenities for a low-income area and offer educational and culturally-significant programs and services to LMI youth.

Discussion

At the beginning of the first program year in this strategic plan, the County had \$1.6 M in unexpended funds for prior years' projects. Three public facility projects from prior years had begun (\$592,492.49, funded and \$125,315.03 expended), but they were not completed by the end of the program year. All three projects will be completed in PY 2019. In addition, of the \$193,346 awarded for public service projects in 2018, \$105,399.71 had been expended, leaving \$87,946.29 to be completed in 2019. Funds, awarded for the home repair program in prior years and available for the program year 2019, amounted to \$134,699, and funds awarded, in prior years, for the acquisition of lots for development of affordable housing totaled \$142,131.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CHEROKEE COUNTY	Government	Economic Development Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
North Central Georgia Habitat for Humanity	Subrecipient	Non-homeless special needs Ownership	Jurisdiction
City of Ball Ground	Government	Non-homeless special needs neighborhood improvements public facilities	Jurisdiction
Canton, GA	Government	neighborhood improvements public facilities	Jurisdiction
City of Holly Springs	Government	neighborhood improvements public facilities	Jurisdiction
City of Nelson	Government	neighborhood improvements public facilities	Jurisdiction
City of Woodstock, GA	Government	neighborhood improvements public facilities	Jurisdiction
MUST Ministries	Subrecipient	Homelessness Rental public services	Jurisdiction

Table 51 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System

As the lead agency, Cherokee County will work through the local city governments and non-profit organizations and subrecipients to implement the program activities. Through the development of the Consolidated Plan, opportunities exist to develop additional partnerships with the Housing and Services Forum – hosted by Cherokee FOCUS (a group addressing the housing needs and services for LMI persons, homeless persons, and persons with addictions). This group comprises non-profits, former homeless persons, and community leaders. Given the increase in children in foster care with the pervasive opioid crisis and rising scarcity of affordable housing, it is increasingly critical for organizations and the County to collaborate to leverage limited resources to meet the community needs. The County began participating in a housing collaborative to meet the housing needs of seniors, veterans, and disabled populations after losing HOME funds in 2015.

One serious gap in the institutional delivery system is the huge need for mental health treatment facilities within the jurisdiction. Highland Rivers Health provides comprehensive treatment and support services for adults, children, and families affected by mental health disorders, intellectual developmental disabilities, and addictive disease. They are a regional provider that serves 12 counties in the Northwest Georgia area. They have 8 outpatient Recovery and Wellness Centers, 3 crisis stabilization /detox units (not located in Cherokee), men’s and women’s residential treatment programs, adolescent clubhouses, and a variety of services delivered in community locations including schools and individuals’ homes. More providers are needed within the community with options for low-mod persons.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance			
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care			
Education	X		
Employment and Employment Training	X	X	

Healthcare	X	X	
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling	X	X	X
Transportation	X		
Other			

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Cherokee County has limited services targeted toward the homeless population. Bethesda Health Clinic offers free or low cost healthcare to individuals many who are homeless or precariously housed. The assistance with these services allows the person/family to have more resources available to cover housing costs and other needs. MUST Ministries, Inc. – Cherokee’s Supportive Housing program provides stable housing and case managers to assist clients in obtaining mainstream benefits not offered by MUST. Cherokee FOCUS works with unaccompanied youth in finding housing, GED achievement, job training, and transportation to jobs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Cherokee County, historically, has not had a large homeless population. During the past several years with the economic downturn, there has been a growth in this population reaching the second highest number of homeless persons in the balance of state continuum of care (encompasses 152 counties). Service organizations and the faith community have been resourceful in meeting the needs of these populations with little overlap in services offered. The Housing and Services Forum that is hosted by Cherokee FOCUS provides a monthly forum to address the needs of homeless and precariously-housed individuals, not just with housing but also with the many services that will put an end to the homeless cycle that they encounter. The collaborative group meets to share ideas and to put plans together to utilize the limited resources available to each group. The primary gap is the limited resources available.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Housing and Services Forum meets on a monthly basis to bring all stakeholders together to develop a unified strategy for referrals and assess progress. Relevant speakers are brought in to educate providers further about resources, approaches, and best practices. The County will continue to participate in this forum to stay abreast with the historic and trending needs of the community. In

addition, the County will broaden its stakeholder input process to enrich and deepen data collection in the planning phases of the program. Having recently completed the Analysis of Impediments to Fair Housing Choice, the County noted a greater survey response rate for the consolidated plan process, compared to previous plans, when employing techniques used in the development of the AI.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Capacity of Public Facilities	2019	2023	Non-Housing Community Development	Countywide LMI persons/households	Non-housing Community Development- Public Facility	CDBG: \$3,621,909	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
2	Increase Capacity of Public Improvements	2019	2023	Affordable Housing Non-Housing Community Development	The City of Ball Ground The City of Canton The City of Woodstock The City of Nelson	Non-housing Community Development - Infrastructure	CDBG: \$766,027	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 800 Persons Assisted
3	Increase Capacity of Public Services	2019	2023	Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide LMI persons/households	Increase Capacity of Public Services	CDBG: \$991,178	Public service activities other than Low/Moderate Income Housing Benefit: 7000 Persons Assisted
4	Eliminate Substandard Housing	2019	2023	Affordable Housing	Countywide LMI persons/households	Affordable Housing	CDBG: \$634,699	Homeowner Housing Rehabilitated: 60 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Access to Affordable Housing	2019	2023	Affordable Housing	Countywide LMI persons/households	Affordable Housing	CDBG: \$897,355	Homeowner Housing Added: 15 Household Housing Unit Housing for Homeless added: 1 Household Housing Unit
6	Planning & Administration	2019	2023	Planning & Administration	Countywide LMI persons/households	Non-housing Community Development- Public Facility Non-housing Community Development - Infrastructure Increase Capacity of Public Services Affordable Housing	CDBG: \$749,100	Other: 1 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Capacity of Public Facilities
	Goal Description	Improve services for LMI persons by expanding/improving public facilities.
2	Goal Name	Increase Capacity of Public Improvements
	Goal Description	Improve the residential neighborhood safety and livability by expanding/improving public facilities and infrastructure
3	Goal Name	Increase Capacity of Public Services
	Goal Description	Provide critical services for low-to-moderate income persons, persons with special needs, and homeless persons.
4	Goal Name	Eliminate Substandard Housing
	Goal Description	Provide Minor/Emergency Home Repair assistance to LMI seniors, veterans, and disabled persons.
5	Goal Name	Access to Affordable Housing
	Goal Description	Provide assistance to LMI persons seeking home ownership and stable housing for persons/families in Supportive Housing
6	Goal Name	Planning & Administration
	Goal Description	Planning & Administration

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The County does not receive HOME funds. Through the funding of lot acquisitions by Habitat for Humanity, it is estimated that 15 affordable housing units will be developed from affordable lots acquired with CDBG funds over the next five years with an anticipated 5 units for low income households and 10 units for moderate income households.

The County is working to strengthen the relationship with the Canton Housing Authority. The Executive Director and select Board members, together with the CDBG Program Office, Cherokee County Senior Services, and The Volunteer Aging Council, a 501(c)(3) whose mission is to address the needs of the elderly population in the County, have partnered to work on the development of a strategy to address the housing needs for seniors and other LMI persons and families. Through periodic meetings with these stakeholders, the CDBG Program Office has encouraged the Executive Director of the Housing Authority to apply for CDBG funds to address the needs for modernization in the housing authority units. The use of CDBG funds would help free up other funds used by the housing authority to meet other needs in the inventory of units. Early in 2019 and offering executive level support, the County Manager asked for the housing authority to come up with a Five-Year Strategic Plan to better able assist the group in determining the resources, challenges, and direction the housing authority will be taking to address housing needs. Through the initial process, the housing authority discovered property they owned that could be developed into housing units. The housing authority has also visited the Housing Authority of the City of Rome, GA to learn how they have successfully added housing units to their inventory. The County will continue to provide strategic guidance as well as financial support, such as modernization of housing authority units, where possible.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Since, the Housing Authority of Canton is an independent organization, Cherokee County does not directly control public housing policies and actions. The Housing Authority meets the Section 504 need for accessible housing but still has a wait list of 2-4 years for an accessible unit. When possible the Authority retrofits the units to meet accessibility needs such as grab bars, egress showers, etc.

Activities to Increase Resident Involvements

Residents are surveyed annually to obtain their input on needs and this information is used in preparing the Authority's five-year plan, including strategies for improving the environment of the units. Housing Authority staff members meet periodically with residents to discuss conditions and Housing Authority operations and to secure input from residents for improvements to the community.

In addition to periodic meetings between housing authority management and residents, the County partners with Habitat for Humanity to hold homeownership workshops. Housing authority residents have opportunities to learn about affordable housing through the Habitat Build Program, at least annually, in the spring of each year. Other locations for homeownership workshops include Woodstock Public Library and the Canton Public Library. Interested persons and families learn about the program requirements of sweat equity hours and financial education, including household budgeting, through the workshops and can apply onsite. The program provides mortgages at zero percent interest.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

The housing authority is not designated as troubled.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The cost of housing and utilities is not affordable to many owner and renter households, especially those earning less than 50% of AMI. There is a shortage of affordable housing units, and construction costs continue to rise. Provision for infrastructure is expensive as development extends to the areas that are not currently developed. Revenue for nonprofit housing developers has declined as a result of cutbacks at the federal level.

The Cherokee County Analysis of Impediments to Fair Housing Choice, April 2018, indicated that zoning laws were seen as significant impediments to the availability of affordable housing. This was mentioned as a particular problem for organizations trying to develop group homes for persons with disabilities. The requirement that group home occupants be ambulatory is one the AI recommended the County review and clarify. Also, the AI produced a goal to eliminate the minimum spacing requirements for group homes. In addition, the reasonable accommodations process was criticized and it was suggested that an ordinance be passed 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. The strongest recent interest in subsidized affordable housing construction has been limited to the senior/elderly population.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Cherokee County will implement the following strategies to remove or ameliorate the Barriers to Affordable Housing:

- Provide funding to participating cities for sidewalks, curb cuts, and infrastructure improvements;
- Provide funding to participating cities for street/streetscape improvements;
- Continue to fund the Minor/Emergency Home Repair program to allow seniors, veterans, and disabled persons to age in place;
- Continue to support the acquisition of lots to develop affordable homes for low-to-moderate income persons in the County;
- Support feasible Low Income Housing Tax Credit applications through letters of endorsement or investment of CDBG funds;
- Conduct outreach to encourage private sector landlords, including those in high opportunity areas, and accessible via CATS (transportation system), to participate in the HCV program;
- Continue to work with Habitat for Humanity and other community partners to increase homeownership opportunities and downpayment assistance for qualified households; and
- Explore opportunities to fund a Tenant-Based Rental Assistance (TBRA) program to assist low income households in securing housing.

SP-60 Homelessness Strategy – 91.215(d)

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

The homeless population is the second highest number in the Balance of State Continuum of Care (of 152 counties) in the state. The County will continue to work with organizations that provide services to the homeless population. The County has previously provided funding to MUST Ministries, Inc. to acquire and renovate a building in order to expand the number of individuals they are able to help, through a job training program that provides a computer lab, an expanded food pantry, an expanded clothes closet that includes work attire for job interviews, and an expanded administration facility for assessing the needs of the clients they serve. In addition, the County has partially funded staff support for case managers in MUST's Supportive Housing program to reach persons experiencing physical disabilities, mental health issues, addictions, or co-occurring issues. Through case managers, MUST's SHP creates an individualized service plan to obtain health services, mainstream benefits, and employment. The County supported MUST Ministries' program in reaching homeless and near homeless persons and families, the only supportive housing program in Cherokee (in 2017 and 2018), and will continue to support the program in 2019 to expand services. MUST refers Cherokee County homeless persons to its Cobb County homeless shelter for immediate needs.

North Georgia Angel House and Goshen Valley Boys Ranch are long term homes for youth and teens in the foster care system. Without the support of family, youth aging out of the foster care system are vulnerable to becoming homeless. Both organizations working with these groups are looking for solutions to this problem and will be seeking assistance to meet these needs.

Addressing the emergency and transitional housing needs of homeless persons

Cherokee Family Violence Center is the only permanent emergency shelter in Cherokee County. While in the emergency shelter individuals are assessed and provided assistance in the court system and a plan is developed for them while in transitional housing. The County will continue to support programs for its residents in the transitional housing program.

While the Strategic Plan does not specifically address emergency shelter, the County will work with organizations seeking funding through the State's Emergency Shelter Grants programs.

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

The County will work with the organizations that serve homeless individuals and families and near-homeless individuals and families with transportation services, counseling services, and job training programs. In addition, the County will support plans to provide shelter. The County will work with Bethesda Community Health Clinic to expand its facilities in order to provide both health and dental services to homeless persons freeing up household resources to meet housing needs. Cherokee FOCUS assists unaccompanied youth obtain GED's, job training, and transportation to jobs to help achieve stable housing, and the County will continue to support programs that assist these at-risk youths.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The County does not have a discharge plan for individuals being released from publicly funded institutions or systems of care or who are receiving assistance from public and private agencies that address different human needs. The County will partner with healthcare providers and agencies that are part of the Balance of State Continuum of Care programs for direction on developing a discharge plan. Guidance will be sought from area jurisdictions, as well, to obtain best practices and solid solutions to reach individuals and families that might be facing homelessness after being discharged from publicly-funded institutions or systems of care or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs. The collaboration should inform the County as to the best approach, whether it be through dissemination of information or creating a partnership with human services providers, healthcare facilities, and public safety agencies. Roles and responsibilities must be established with the discharge plan to effectively reach this vulnerable population.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The Cherokee County Minor/Emergency Home Repair Program follows HUD's guidelines for reducing exposure to lead based paint hazards. Homes belonging to homeowners that are built prior to 1978, will have lead based paint hazards abated if such paint is disturbed as a result of the minor or emergency repair performed in the home.

How are the actions listed above related to the extent of lead poisoning and hazards?

The above actions will ensure that when lead based paint hazards are identified, the appropriate abatement steps are taken.

How are the actions listed above integrated into housing policies and procedures?

The County's Minor/Emergency Home Repair program currently includes policies and procedures that are followed in the event lead based paint hazards are detected and determined that the intended repair will disturb such paint. Lead based paint hazards are abated to remove the exposure to lead poisoning and provide safe homes that may be occupied by children in the future.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The County has seen an increase in poverty from the 2000 decennial census to the 2010 decennial census (about three percentage points). The County employs strategies to reduce the number of families and individuals who fall under the poverty level and these include improving job skills/increasing employment opportunities and reducing the cost of living for low-income families, particularly those with disabilities or limitations.

Upgrading Job Skills/Increasing Employment

- Cherokee County will support public and private service organizations and private sector businesses who are working to stimulate increased employment among people in poverty;
- The County will support organizations such as The Cherokee Day Training Center, MUST Ministries, Inc., Next Step Ministries, Inc., Goshen Valley Boys Ranch, North Georgia Angel House, and Cherokee Focus, organizations that provide training for individuals in poverty, those at risk of entering poverty, and individuals who have disabilities; and
- The County's Section 3 policy encourages businesses to incorporate job-training for individuals as part of their organizations.

Reduce the Cost of Living

- The County will support efforts of agencies, public and private, that coordinate assistance provided to families in poverty;
- The County will strengthen its efforts to assist families in poverty by directly funding service agencies that help low and moderate income households and persons with disabilities;
- The County will help agencies access federal, state, and private resources which can provide critically-needed services – such as food, shelter, health services, and clothing and will encourage community leveraging of resources; and
- The County will work to increase the availability of affordable housing for low-income families through rehabilitation of deteriorated homes, support of low-income tax credit projects, and increase the availability of housing for first-time homebuyers.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Cherokee County will work with local human services providers, such as Cherokee FOCUS, MUST Ministries, Inc., Bethesda Community Clinic, Cherokee Family Violence Center, and the Canton Housing Authority to ensure that low and moderate income families who are assisted through the housing component of the Consolidated Plan receive information and counseling on other services that may

assist them with education and job development and other types of financial assistance to reduce the negative impact of their low incomes. The County takes advantage of the networking meeting with service providers at the housing and services collaborative hosted by Cherokee FOCUS.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

A primary concern for the County is the selection of administratively strong subrecipients capable of carrying out program activities in compliance with HUD regulations. Once selected, the County will provide training and assistance to ensure full understanding of current regulations, providing examples of compliance with HUD standards.

Subrecipients with limited CDBG experience or those that have had previous problems administering program activities will be given priority for monitoring of program activities. Areas of primary monitoring focus will be financial reporting, beneficiary documentation, and fund management controls. A workshop entitled “You’ve Got Money...Now What” has just been put together and newly-funded subrecipients will be invited to attend sessions to prepare for the administrative burden of receiving grant funds.

In addition, CDBG subrecipients will be monitored periodically during the year, either through desk reviews or on-site monitoring, for compliance with HUD requirements (including Section 3 and Equal Opportunity) and to measure progress in meeting objectives of program activities. Risk assessments will be used to schedule on-site monitoring visits. In addition, staff attends the annual Section 3 summits to learn best practices for Section 3 requirements and to gain insight into successful implementation of Section 3 requirements.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The activities included in the plan do not generate program income and therefore the County does not expect to receive program income.

The County does not receive HOME Program funding, so affordable housing needs will be addressed with the use of CDBG funds. Approximately \$230,000 to \$300,000 will be allocated each program year to address affordable housing needs.

The same assumptions were used for the available resources for the Action Plan. The activities included in the plan do not generate program income and therefore the County does not expect to receive program income.

Because the HOME consortium that the County was part of during some of the last Con Plan period disbanded, HOME funds are no longer available to the County. Instead, affordable housing needs are addressed through a Minor/Emergency Home Repair program and the acquisition of lots to develop affordable housing. The repair program is administered by Habitat for Humanity – North Central Georgia and it receives an annual allotment of \$100,000. Funding for lot acquisitions is based on available funds remaining from other agencies' requests for funding of

public services and capital projects and a prioritization of needs.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,254,884	0	1,605,384	2,860,268	4,800,000	Expected amount available remainder of the Con Plan assumes an allocation of \$1.2 M for each of the next four years. Prior year resources are the result of committed funds for projects not yet finished by the end of the program year (\$891,861) and uncommitted funds from prior year projects not yet begun (\$713,523).

Table 54 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funds do not require a match, but the County does require that subrecipients provide a minimum of 10% of the activity cost from non-federal sources. i.e., private donations and fund-raising activities. Funding for infrastructure activities is often leveraged with local and state funds.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The County's Senior Services Center is publicly-owned, and it will continue to serve the needs of the senior citizens of Cherokee County. An expansion project funded with prior year resources was begun in program year 2018, and the expansion will allow the facility to expand services to reach more clients ranging for home-delivered meal recipients to seniors under the care of a case manager.

In addition, the County will fund the acquisition of property used to benefit homeless and near-homeless persons who enter the supportive housing program with MUST Ministries to reach stability and gain mainstream benefits. Other property to be acquired will be a building for the Cherokee County Historical Society to improve the neighborhood amenities for a low-income area and offer educational and culturally-significant programs and services to LMI youth.

Discussion

At the beginning of the first program year in this strategic plan, the County had \$1.6 M in unexpended funds for prior years projects. Three public facility projects from prior years had begun (\$592,492.49, funded and \$125,315.03 expended), but they were not completed by the end of the program year. All three projects will be completed in PY 2019. In addition, of the \$193,346 awarded for public service projects in 2018, \$105,399.71 had been expended, leaving \$87,946.29 to be completed in 2019. Funds, awarded for the home repair program in prior years and available for the program year 2019, amounted to \$134,699, and funds awarded, in prior years, for the acquisition of lots for development of affordable housing totalled \$142,131.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Capacity of Public Facilities	2019	2023	Non-Housing Community Development	Countywide LMI persons/households	Non-housing Community Development- Public Facility	CDBG: \$1,306,909	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted
2	Increase Capacity of Public Services	2019	2023	Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide LMI persons/households	Increase Capacity of Public Services	CDBG: \$271,178	Public service activities other than Low/Moderate Income Housing Benefit: 2705 Persons Assisted
3	Eliminate Substandard Housing	2019	2023	Affordable Housing	Countywide LMI persons/households	Affordable Housing	CDBG: \$234,699	Homeowner Housing Rehabilitated: 12 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Access to Affordable Housing	2019	2023	Affordable Housing	Countywide LMI persons/households	Affordable Housing	CDBG: \$467,131	Homeowner Housing Added: 6 Household Housing Unit Housing for Homeless added: 1 Household Housing Unit

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Capacity of Public Facilities
	Goal Description	Capital project applications submitted for the 2019 program year were limited and agencies are being asked to obtain fundraising to enable projects to move forward in 2019. The County anticipates having \$845,870 in unexpended funds from prior program years as available resources for program year 2019 to finish projects started but not completed in 2018. In addition to the funds from prior year projects, the funding to be awarded in 2019 amounts to \$461,039. Funds will be used to help acquire a building for an agency that provides educational services to youth. Prior year funds will be used to finish up a project that will add space at a group home setting for boys in foster care and finish the project to expand the facility at the County's Senior Center.
2	Goal Name	Increase Capacity of Public Services
	Goal Description	The County anticipates having \$87,946 in unexpended funds from program year 2018 designated for public services in addition to the funds to be awarded for public service projects in 2019 of \$183,232. Projects for the first year of the action plan will fund various activities ranging from staff support, transportation, and a summer camp for youth development.

3	Goal Name	Eliminate Substandard Housing
	Goal Description	The County anticipates having \$134,699 in prior year funds to continue support of the Minor/Emergency Home Repair program to address substandard housing in the County. The program will continue to be funded in 2019.
4	Goal Name	Access to Affordable Housing
	Goal Description	<p>The County anticipates having \$142,131 in prior year funds as available resources to fund the acquisition of lots for which affordable homes will be developed on in addition to \$175,000 of the 2019 allocation expended for acquisition of lots for the development of affordable housing.</p> <p>The County also anticipates funding the acquisition of housing for a supportive housing program with an allocation of \$150,000.</p>

Projects

AP-35 Projects – 91.220(d)

Introduction

During the application review process, several projects were flagged as potential funded projects with caveats attached to them. The agencies were asked to have their fundraising efforts accomplished by the time HUD announced the allocation for 2019. Agencies who had their fundraising were awarded funding for their projects. A small amount represents potential funding to those projects is designated as “To Be Determined”.

Among the public service projects selected, the County intends to address transportation needs by funding the acquisition of a vehicle for MUST Ministries, Inc. – Cherokee to transport their supportive housing clients.

Projects

#	Project Name
1	Mimms Boys & Girls Club
2	Cherokee Child Advocacy Council [Anna Crawford Children's Center]
3	MUST Ministries, Inc.
4	MUST Ministries, Inc.
5	Bethesda Community Clinic
6	YMCA Scholarship Program
7	Mimms Boys & Girls Club
9	Habitat for Humanity Acquisition
10	MUST Ministries, Inc.
11	Habitat for Humanity-Repair Program
12	Cherokee County Historical Society - Acquisition
13	Projects to Be Determined
14	Planning & Administration

Table 56 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

With the limited CDBG resources, the County looks at projects that bring leveraged resources and the capacity to make the most impact to meet underserved needs within the community. Responsibilities for some public facility projects for cities will be handled by the cities requiring less County oversight. The projects have a high and lasting impact on community needs and help LMI persons/households with access to much needed services. Certainly, projects addressing affordable

housing will be given high priority as well.

AP-38 Project Summary
Project Summary Information

1	Project Name	Mimms Boys & Girls Club
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Facilities
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$24,219
	Description	Transportation program that picks up children from area schools for after-school club programs and summer programs.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	The number of youth expected to benefit from the transportation service is 297 low-to-moderate income members. Members who are not LMI and parents of all children increase the total number of persons to benefit to 743.
	Location Description	The program will benefit youth scattered throughout the County.
2	Planned Activities	The activity will partially fund the salaries of two drivers and related fuel and insurance costs for the two vehicles.
	Project Name	Cherokee Child Advocacy Council [Anna Crawford Children's Center]
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$25,057
	Description	The program provides staff support of two bi-lingual counselors and forensic interviewers for victim children of abuse and/or neglect.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	The expected number of abused children that will benefit from the program is 157. Non-offending caregivers add to the total of persons to benefit and bring that estimate to 265.
	Location Description	The Children's Center is located at 9870 Highway 92, Suite 200, Woodstock, GA. The facility is equipped with child-friendly and child-scaled interview rooms with hidden video equipment to record the interviews.

	Planned Activities	The program will receive funding to partially support the salaries of two bilingual counselors/forensic interviewers who serve victim children of abuse and/or neglect.
3	Project Name	MUST Ministries, Inc.
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$23,166
	Description	The Supportive Housing Program uses case managers to address the needs of homeless clients with disabling conditions and enter them in the supportive housing program. First, stable housing is obtained and case managers then assist clients, who suffer from addiction, mental illness, physical disabilities, or co-occurring disorders, obtain mainstream benefits.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	The estimated number of clients to benefit from the services is 70 homeless persons who suffer from disabling conditions that do not allow them to live independently.
	Location Description	Supportive housing units are located on scattered sites throughout the county.
4	Planned Activities	The activity will be the staff support of case managers who serve the clients in the supportive housing program.
	Project Name	MUST Ministries, Inc.
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$40,013
	Description	The Supportive Housing program provides transportation services to the clients in the supportive housing program.
	Target Date	12/31/2019

	Estimate the number and type of families that will benefit from the proposed activities	The estimated number of persons to benefit from the transportation program is 70 clients.
	Location Description	The supportive housing units are located on scattered sites in Canton.
	Planned Activities	The activity will partially fund the acquisition of a vehicle to transport clients in the supportive housing program.
5	Project Name	Bethesda Community Clinic
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$38,134
	Description	The Care Coordinator, staffed by a Registered Nurse, to advocate for the needs of patients who have been disadvantaged by socio-economics and injustices, thereby improving health care equity. The position will coordinate all aspects of care for patients with chronic diseases and those needing specialized referrals and/or surgeries, post-hospitalization, post ER visits, and transitional care and oversee the appropriation of resources (human, material, financial) as needed.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 1,600 uninsured or underinsured low-to-moderate income individuals will benefit from the services of a Care Coordinator.
	Location Description	The clinic is located a 111 Mountain Brook Drive, Suite 100, Canton, but it serves clients who live all over Cherokee County.
	Planned Activities	The planned activity is to partially fund the salary for the care coordinator for the clinic to expand the capacity to provide health care services and improve the level of services to clients who use the clinic.
6	Project Name	YMCA Scholarship Program
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Services
	Needs Addressed	Increase Capacity of Public Services

	Funding	CDBG: \$18,954
	Description	The YMCA provides an outdoor summer camp on Lake Allatoona that provides youth development in which programs offered provide opportunities for teens to shadow a YMCA staff person, for service projects, and for cultural field trips all of which promote social growth, self-confidence, and interpersonal skills.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	The estimated number of LMI youth to benefit from the program is 450.
	Location Description	The YMCA is located at 151 Waleska Street in Canton, but the day camp is held at Lake Allatoona, 201 East Bells Ferry Road, Woodstock. The YMCA will provide transportation to the summer camp that is essentially a 227-acre outdoor facility.
	Planned Activities	The program will fund scholarships to LMI youth on a sliding scaled based on household income and the level assistance ranges from 20% to 100%, but a greater portion of scholarships are expected to cover 50% of the fee for the week.
7	Project Name	Mimms Boys & Girls Club
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$13,689
	Description	The program will offer teens an opportunity to participate in a mentoring/apprenticeship program to develop soft/work skills for all career paths graduating seniors face, whether continuing to college or technical school, the military, or directly into wage-earning jobs.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	The program targets 13-18 year old club members and expects to benefit 61 teens.

	Location Description	The Mimms Boys & Girls Club is located at 1082 Univeter Road, Canton, GA.
	Planned Activities	The planned activity will be partial staff support for the staff responsible for the workforce development program aimed at providing training to LMI teens to prepare them for further education toward careers, entry into the military, or entry into wage-earning careers after high school.
8	Project Name	Habitat for Humanity Acquisition
	Target Area	Countywide LMI persons/households
	Goals Supported	Access to Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$175,000
	Description	Project acquires lots for development of affordable housing.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 6 affordable homes (six households/families) will be developed from the acquisition of lots.
	Location Description	Lots selected for acquisition are undetermined at the time of this plan but will likely be scattered sites throughout the county.
9	Planned Activities	The activity will partially fund the acquisition of lots for the development of affordable housing. Families who qualify for the affordable home is required to provide sweat equity and time spent on other Habitat builds. Clients also complete a household budgeting and managing household finances training as part of the program.
	Project Name	MUST Ministries, Inc.
	Target Area	Countywide LMI persons/households
	Goals Supported	Access to Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$150,000
	Description	The project allows for the acquisition of housing for MUST's supportive housing program to provide homeless clients stable housing.
	Target Date	12/31/2019

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 6 homeless families will benefit from the acquisition of a supportive housing unit.
	Location Description	The site for the supportive housing unit has not been determined.
	Planned Activities	The activity will partially fund the acquisition of supportive housing for the most difficult portion of the homeless population, persons who suffer from physical or mental disabilities, from addictions, or co-occurring disorders that prevent independent living.
10	Project Name	Habitat for Humanity-Repair Program
	Target Area	Countywide LMI persons/households
	Goals Supported	Eliminate Substandard Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$100,000
	Description	Cherokee County partners with Habitat for Humanity - North Central Georgia and funds the administration of the Minor/Emergency Home Repair Program.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that twelve households will benefit from the minor/emergency home repair program.
	Location Description	The location of the repair sites are scattered throughout the county.
11	Planned Activities	The activity will allow \$100,000 to be allocated to Habitat for Humanity to administer the minor/emergency home repair program designed to help seniors, veterans, and disabled persons to age in place and maintain the affordable housing stock in the county.
	Project Name	Cherokee County Historical Society - Acquisition
	Target Area	Countywide LMI persons/households The City of Canton
	Goals Supported	Increase Capacity of Public Facilities
	Needs Addressed	Non-housing Community Development- Public Facility
	Funding	CDBG: \$400,000

	Description	Acquisition of a building for Cherokee County Historical Society's Museum, educational services for LMI youth, and administrative offices for preserving historical monuments in the County
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 175 LMI youth will benefit from the program and services offered by the historical society.
	Location Description	The location of the building to be acquired is located in Downtown Canton, a low income area that lacks amenities and services of cultural significance and educational benefit. The proposed site is located at 221 East Marietta Street.
	Planned Activities	The activity will fund the acquisition of a building to house the Cherokee County Historical Society that will have museum space, offer educational and cultural services to LMI youth, and house administrative offices of the agency.
12	Project Name	Projects to Be Determined
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Facilities
	Needs Addressed	Non-housing Community Development- Public Facility
	Funding	CDBG: \$61,039
	Description	The 2019 application process yielded applications for capital projects that were not yet fully supported with expected fundraising required to move forward. Projects represented by the total allocation will move forward on the basis of having the fundraising by the time HUD announced the 2019 allocation.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Until projects are identified, an estimate cannot be made for the number and type of families that will benefit.
	Location Description	The sites for these potential projects are scattered throughout the county.

	Planned Activities	The 2019 application process yielded applications for capital projects that were not yet fully supported with expected fundraising required to move forward. Projects represented by the total allocation will move forward on the basis of having the fundraising by the time HUD announced the 2019 allocation. Potential projects are the construction of additional space for developmentally disabled adults and sidewalk and stormwater infrastructure improvements in the City of Nelson.
13	Project Name	Planning & Administration
	Target Area	Countywide LMI persons/households
	Goals Supported	Increase Capacity of Public Facilities Increase Capacity of Public Services Eliminate Substandard Housing Access to Affordable Housing
	Needs Addressed	Affordable Housing Non-housing Community Development- Public Facility Increase Capacity of Public Services Non-housing Community Development - Infrastructure
	Funding	CDBG: \$185,613
	Description	The County uses a portion of grant funds to conduct planning and administer the program.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	All households and individuals served through CDBG-funded activities will benefit from the use of planning & admin monies.
	Location Description	Cherokee County, GA
	Planned Activities	The County expects to use less than the 20% maximum allowed to plan and administer the CDBG program.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The County does not intend to direct allocations toward specific targeted neighborhoods which is optional within the Consolidated Plan. However, geographic distributions are available in IDIS for the Consolidated Plan suite and the following are estimates of the use of funds in *Target Areas*. The County seeks equitable distribution of funds but requires the cities to have shovel-ready projects when applying for funding.

Geographic Distribution

Target Area	Percentage of Funds
Countywide LMI persons/households	100
The City of Ball Ground	0
The City of Canton	0
The City of Woodstock	0
The City of Nelson	0

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Each of the Cities was consulted regarding the needs over the five-year period. None of the participating Cities submitted requests for funding for the program year, so no distributions will be made for the first year for the Consolidated Plan. Rather the agencies that provide human services and the public facilities that will benefit from awards will serve low-to-moderate income persons throughout the County.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The County has identified two program/activities for which affordable housing will be addressed. As a result of the County no longer receiving HOME funds through the Georgia Urban County Consortium (with Cobb County as the lead agency), a program was developed in 2015 to provide repairs to the homes of seniors, veterans, and disabled persons. This Minor/Emergency Home Repair program can provide repairs to major systems in the home such as HVAC, roofing, plumbing, electrical, and accessibility modifications. The Minor/Emergency Home Repair program anticipates providing, through partnership with Habitat for Humanity who administers the program, repairs to 12 low income households.

The other activities for which the County anticipates to support is the acquisition of lots for affordable housing development. The acquisition of lots will result in the development of approximately six affordable housing units. The result of these actions is preserving affordable housing and providing a safe and sustainable environment for the seniors, veterans, and disabled persons to age in place. All homes built prior to 1978 receive lead based paint abatement if it is present. In addition, the County intends to fund the acquisition of a supportive housing unit for MUST Ministries.

One Year Goals for the Number of Households to be Supported	
Homeless	1
Non-Homeless	18
Special-Needs	0
Total	19

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	6
Rehab of Existing Units	12
Acquisition of Existing Units	1
Total	19

Table 59 - One Year Goals for Affordable Housing by Support Type
Discussion

In addition, the County will be funding transportation programs for the Boys & Girls Club and MUST Ministries, Inc. – Cherokee to meet the needs of accessibility to services for the LMI community.

The repair program helps to preserve the affordable housing stock while allowing seniors, veterans, and disabled persons to continue to live in homes that would otherwise not be safe. The acquisition of lots

for affordable housing development increases access to affordable housing for LMI individuals and families in the County.

And, the County remains committed to the implementation of the strategies to remove or ameliorate the barriers to affordable housing as outlined in SP-55.

AP-60 Public Housing – 91.220(h)

Introduction

Public housing in Cherokee County is available through the Housing Authority of the City of Canton, an independent organization. The Housing Authority provides public housing units, but does not handle Section 8 vouchers. Vouchers are handled by the Georgia Department of Community Affairs.

The Housing Authority has 145 units of public housing on three campuses.

Actions planned during the next year to address the needs to public housing

The Canton Housing Authority is addressing deficiencies determined from the most recent inspection. Major systems are being evaluated through a physical needs assessment to prepare for rehabilitation to all three campuses (electrical, plumbing, HVAC, etc.). The properties also need fencing, gutter work, and trees trimmed or taken down. Those needs will be addressed as funding allows.

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

Staff and residents meet together several times each year to discuss needs and give feedback on planned improvements to the properties.

The community center at the Shipp Street campus previously provided child care, but the contract ended about mid-year 2018. Plans are underway to complete rehab of the facility to allow for a computer lab and space to host job fairs, workshops, and homeownership workshops. Habitat for Humanity conducts an annual application workshop for residents to encourage homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Housing Authority of Canton is not designated as troubled.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

It is estimated that 219 persons were sheltered homeless persons (Emergency Shelter and Transitional Housing) in 2018. The 2017 unsheltered persons (predictive model and counts) totaled 69. Homelessness is a difficult population to count and it should be assumed that the actual numbers would be higher than those reported. The County supports organizations that provide services to the homeless and near homeless population of individuals and families.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The one year goals include funding for staff support of the case managers that are part of the Supportive Housing Program at MUST Ministries, Inc. – Cherokee. MUST Ministries is part of the Balance of State Continuum of Care that receives ESG funds to address the needs of homeless persons. The County does not have an overnight emergency shelter, but MUST provides transportation to individuals who may be referred to their shelter in Cobb County. The following actions are also included as part of this plan:

- CDBG Staff will participate with the Housing and Services Forum in the development of a plan to leverage resources and address the needs of the homeless population.
- CDBG Staff will participate in the development of a Community Provider booklet.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County will continue to support organizations providing emergency shelter and/or transitional housing through the Certifications of Consistency required for ESG funding.

The County has previously supported Cherokee Family Violence Center through funding for staff support. This staff person assessed the needs of those entering the emergency shelter and developed plans for the victims and families of domestic violence while they are in the transitional housing. In addition to that activity, the County supported the staff responsible for the children's program that assisted victim children of domestic violence. The agency chose not to apply for funding in 2018 and 2019, but the County will keep regular contact with the agency to determine the needs and opportunities for financial support.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals

and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The County partners with Habitat for Humanity - North Central Georgia to reach out to the families in public housing during the application cycles each year. As part of the application process individuals receive counselling on homeownership, credit repair, and stable job environments. When a resident successfully participates with Habitat for Humanity, the Housing Authority is able to free up a unit from its waiting list.

The County continues to support the Boys & Girls Club with funding for the transportation of LMI youth for the afterschool programs and summer programs. Through this program parents are able to have safe/affordable child care while they work or seek employment.

CDBG staff will continue the dialogue with North Georgia Angel House and Goshen Valley Boys Ranch to locate housing for its residents aging out of the foster system. In addition, Cherokee FOCUS assists drop-out youth in obtaining GED's and provides training and transportation to jobs for youth to help obtain stable housing and avoid being precariously housed. And, although the agency did not apply for funding in 2019, the County will remain a participant in the Housing and Services forum hosted by Cherokee FOCUS.

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

The County does not have a discharge plan for individuals being released from publicly funded institutions or systems of care or who are receiving assistance from public and private agencies that address different human needs. The County will partner with healthcare providers and agencies that are part of the Balance of State Continuum of Care programs for direction on developing a discharge plan. Guidance will be sought from area jurisdictions, as well, to obtain best practices and solid solutions to reach individuals (or families) that might be facing homelessness after being discharged from publicly-funded institutions or systems of care or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs. The collaboration should inform the County as to the best approach, whether it be through dissemination of information or creating a partnership with human services providers, healthcare facilities, and public safety agencies. Roles and responsibilities must be established with the discharge

plan to effectively reach this vulnerable population.

Discussion

The County supports organizations that provide services to the homeless and the near-homeless populations of individuals and families. Nonprofit agencies that apply for ESG funds to serve the jurisdiction, seek certification of consistency with the County's Consolidated Plan. The County will continue to support these agencies in the Balance of State Continuum of Care whose programs address the needs of the homeless and special needs populations.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The cost of housing and utilities is not affordable to many owner and renter households, especially those earning less than 50% of AMI, and there is a shortage of affordable housing units. Construction costs continue to rise. Provision for infrastructure is expensive as development extends to the areas that are not currently developed.

The Cherokee County Analysis of Impediments to Fair Housing Choice, April 2018, indicated that zoning laws were seen as significant impediments to the availability of affordable housing. This was mentioned as a particular problem for organizations trying to develop group homes for persons with disabilities. The requirement that group home occupants be ambulatory is one the AI recommended the County review and clarify. Also, the AI produced a goal to eliminate the minimum spacing requirements for group homes. In addition, the reasonable accommodations process was criticized, and it was suggested that an ordinance be passed 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. The strongest recent interest in subsidized affordable housing construction has been limited to the senior/elderly population.

The AI indicated respondents felt that much of the affordable housing in the County is located in neighborhoods with high concentrations of minority residents. These neighborhoods often lack facilities and services, i.e., sidewalks, curb cuts for accessibility, access to better schools, retail, and medical services.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The County will continue to fund the acquisition of lots to develop affordable housing (\$175,000). In addition to that, the County will support funding requests to improve infrastructure and sidewalks in low-to-moderate income areas of participating cities.

Goals were set in the AI to address the negative effects of zoning ordinances, and the CDBG Program Office will open the conversation to explore opportunities to address the negative impact on persons with disabilities as a result of spacing and ambulatory requirements for group home residents.

Discussion:

The County's Planning & Zoning Department has engaged in the exploration of the feasibility of an affordable housing project with the City of Woodstock targeted toward the population that is workforce

persons that often find that they must live outside the county where more affordable housing is located and have long commutes to jobs within the county. The CDBG Program office will support this effort in any way possible.

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

- A primary focus will be to expand the capacity to serve LMI persons through the expansion of public facilities and support of public service activities serving LMI persons and vulnerable populations in the community.
- Work with non-profit organizations to address transportation needs.

Actions planned to foster and maintain affordable housing

- Use funds to acquire lots to develop new affordable housing units.
- Use funds to repair homes of seniors, veterans, and disabled persons to preserve the affordable housing stock.
- Reach out to and support developers seeking LITC for the development of affordable housing communities.

Actions planned to reduce lead-based paint hazards

- All homes built prior to 1978 that are repaired will receive a risk assessment and abatement if required.
- Homes with asbestos will have the hazard abated as part of the repair.

Actions planned to reduce the number of poverty-level families

The Housing and Services Forum, a group of housing organizations, service providers, and religious organizations, facilitates the sharing of resources and best practices for leveraging limited funds to address the needs of poverty-level families and the most vulnerable of the community. Stakeholders at the forum are made aware of available funding to support the efforts to reduce the number of persons in poverty. The County will continue to support the Transportation Program and Education Program at the Boys & Girls Club to allow working parents to have access to affordable child care after school and during the summer. LMI youth benefit from club services to improve literacy, job skills, and life skills that will prepare them for success after completing high school.

Actions planned to develop institutional structure

The Planning process also provided the County with the opportunity to be more involved in the Balance of State Continuum of Care process. MUST Ministries, Inc. – Cherokee is also the organization that takes the lead role in the PIT count and CDBG staff participates in some capacity to assist with care packages

or counts at other agencies where homeless or precariously housed individuals may seek services. The County will coordinate actions with MUST Ministries, Inc. – Cherokee, FOCUS and DCA to address needs for the Balance of State Continuum of Care.

County staff also participates in a Housing Collaborative that includes the Volunteer Aging Council, Habitat for Humanity – North Central Georgia, Senior Services, and the nonprofit agency Homeless Veterans of Cherokee County. This group addresses the housing needs of low-to-moderate income persons, veterans, and disabled persons. The County will continue to participate in this collaborative group to help in providing repairs for the target population.

Actions planned to enhance coordination between public and private housing and social service agencies

The County will encourage coordination between Habitat for Humanity - North Central Georgia and the Housing Authority of Canton to foster first-time ownership for public housing residents. In addition, the County will support affordable housing developers seeking LITC projects in the county.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

Projects planned with CDBG funds expected to be available during the year are identified in the Projects Table. The County does not have program income available at the beginning of this program year.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

The overall benefit of 70% of CDBG funds used to serve low and moderate income persons is expected to be met each program year.


Attachments

Grantee SF-424's and Certification(s)

OMB Number: 4540-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424		
<div> <div> * 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application </div> <div> * 2. Type of Application: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision </div> <div> * If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/> </div> </div>		
<div> * 3. Date Received: <input type="text"/> </div> <div> 4. Applicant Identifier: <input type="text"/> </div>		
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
State Use Only: <div> 6. Date Received by State: <input type="text"/> </div> <div> 7. State Application Identifier: <input type="text"/> </div>		
B. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="Cherokee County GA"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="33-0000790"/>		* c. Organizational DUNS: <input type="text" value="LC1492119000"/>
d. Address:		
* Street1: <input type="text" value="1120 Bluffs Parkway"/>		
* Street2: <input type="text"/>		
* City: <input type="text" value="Cartersville"/>		
* County: <input type="text" value="Cherokee"/>		
* State: <input type="text" value="GA: Georgia"/>		
* Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip/Postal Code: <input type="text" value="30114 5650"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="CDBG Program Office"/>		Division Name: <input type="text" value="Finance Department"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Ms"/> * First Name: <input type="text" value="Laura"/>		
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Calton"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="CDBG Manager"/>		
Organizational Address: <input type="text" value="CDBG Program Office"/>		
* Telephone Number: <input type="text" value="(770) 721-7887"/>		Fax Number: <input type="text" value="(678) 634-6775"/>
* Email: <input type="text" value="lcalton@cherokee.ga.gov"/>		

Application for Federal Assistance SF-424	
* 8. Type of Applicant 1: Select Applicant Type: <input type="text" value="B: Community Development"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U. S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.318"/> CFFA Title: <input type="text" value="Community Development Block Grant"/>	
* 12. Funding Opportunity Number: <input type="text" value="E-19-00-1) CDBG"/> * Title: <input type="text" value="Community Development Block Grant"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Cherokee County CDBG Program"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional District Of:	
* a. Applicant: <input type="text" value="GA-001"/>	* b. Program/Project: <input type="text" value="GA-006"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2019"/>	* b. End Date: <input type="text" value="12/31/2019"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="1,254,884.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="1,254,884.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on: <input type="text"/> <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) <input checked="" type="checkbox"/> I AGREE. <small>-- The list of certifications and assurances or an internet site where you may wish to refer is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Harry"/>
Middle Name: <input type="text" value="E."/>	
* Last Name: <input type="text" value="Johnston"/>	
Suffix: <input type="text" value=""/>	
* Title: <input type="text" value="Chairman, Board of Cherokee County"/>	
* Telephone Number: <input type="text" value="(878) 493-6001"/>	Fax Number: <input type="text" value=""/>
* Email: <input type="text" value="hjohnston@cherokeega.com"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="06/05/2019"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2012

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (03-18-UD42), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

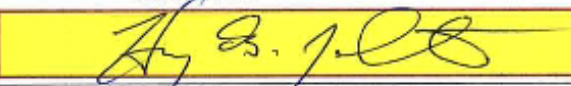
- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§9801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1581-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-516), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§521 and 527 of the Public Health Service Act of 1944 (42 U.S.C. §§290 ed-3 and 290 ed-3) as amended, relating to confidentiality of a cohort and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§801 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424-1 (Rev. 1-81)
Prescribed by OMB Circular A-102

14. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
15. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7329) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
16. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction agreements.
17. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
18. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1966, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
19. Will comply with the Wild and Scenic Rivers Act of 1988 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
20. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11583 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
21. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
22. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
23. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipients from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Chairman, Board of Commissioners
APPLICANT ORGANIZATION	DATE SUBMITTED
Cherokee County, GA	06/05/2019

SF-124D (Rev. 7-97) Back

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

06/05/2019
Date

Chairman, Cherokee County Board of Commissioners
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019, a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically harrng entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2006d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.


Signature of Authorized Official

06/05/2019
Date

Chairman, Cherokee County Board of Commissioners
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance – If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs – It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

06/05/2019
Date

Chairman, Cherokee County Board of Commissioners
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except, with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.


Signature of Authorized Official

06/05/2019
Date

Chairman, Cherokee County Board of Commissioners
Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.


Signature of Authorized Official

06/05/2019
Date

Chairman Cherokee County Board of Commissioners
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix - Alternate/Local Data Sources

1	Data Source Name
	QuickFacts from the US Census Bureau
	List the name of the organization or individual who originated the data set.
	Provide a brief summary of the data set.
	Quickfacts.census.gov, Cherokee County. Provides median household income 2007-2011
	What was the purpose for developing this data set?
	To have current median household income
	Provide the year (and optionally month, or month and day) for when the data was collected.
	Briefly describe the methodology for the data collection.
Describe the total population from which the sample was taken.	
Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.	

APPENDIX “C”

CHEROKEE COUNTY CITIZEN PARTICIPATION PLAN

CHEROKEE COUNTY CDBG PROGRAM

CITIZEN PARTICIPATION PLAN

(Revised June 2020)

The Consolidated Plan regulations require HUD local government grantees to adopt a Citizen Participation Plan. This Plan reflects Cherokee County's compliance with the HUD requirements for citizen participation in all appropriate HUD grant programs as of June 2020. This Plan contains the required elements listed in the Consolidated Plan regulations at **24 CFR 91.105(b)** and **24 CFR 5.158**. The Cherokee County CDBG Program Office conducts the planning and administration for the Community Development Block Grant [CDBG] Program.

1. CITIZEN PARTICIPATION:

Cherokee County has devised specific actions to encourage participation in its housing and community development programs, particularly by persons of low to moderate income [LMI]. Some of the actions include:

- Review of all citizen comments and incorporation of such comments in the Consolidated Plan, as applicable;
- Analyze the impact of Consolidated Plan program activities on neighborhood residents, particularly LMI residents;
- Conduct Needs Assessments and appropriate on-site visits to each proposed project before including it in the Proposed Consolidated Plan;
- Meet with neighborhood groups to inform them about the Consolidated Plan, project eligibility, the program planning process, project selection and funding, and the project implementation process;

Cherokee County will provide a forum for open communication with its residents, particularly LMI persons regarding its HUD funded programs. Cherokee County will strive to increase residents' participation in its housing, community development, and human services programs by providing relevant information so persons/agencies in Cherokee County might benefit from these grant programs. Techniques will include public housing meetings/forums, neighborhood meetings, presentations to civic associations, public hearings, faith-based meetings, newspaper articles and advertisements, e-mail, feature stories, and individual personal contacts.

The cities of Ball Ground, Canton, Holly Springs, Nelson, Waleska, and Woodstock (participating cities) located within the County elected to participate in the CDBG Program. Cherokee County makes a special effort to provide timely and accurate information about housing, community development, and human services program activities to all of Cherokee's participating cities. Numerous meetings are held and written documents are transmitted to all the participating cities. Many of the heaviest concentrations of LMI persons reside within the boundaries of these cities.

CHEROKEE COUNTY CDBG PROGRAM

2. ACCESS TO RECORDS, LOCAL MEETINGS AND INFORMATION:

Cherokee County will provide reasonable notice for all Public Hearings. Information and records relating to Cherokee County housing, community development, and human services program activities that are made available to the public for review and comment, according to the requirements of Federal, State, and local laws.

Each city participating in the Cherokee County CDBG Program provides a forum for local resident input on proposed projects during one or more of its Council meetings. Projects are discussed and approved by the respective participating City Councils prior to submission to the Cherokee County CDBG Program Office.

Notices of public hearings are publicized throughout the County. Two weeks before the public hearings are held, at least one advertisement is placed in the local newspaper of general circulation, the *Cherokee Tribune*. The advertisements are either "display ads" or "legal ads" which appear in the sections of the newspaper most likely to be read by citizens. Additionally, the Cherokee County CDBG Program Office emails all client organizations a reminder as well.

Copies of public hearing notices, descriptive information concerning HUD assisted housing, community development and human services programs, Proposed Consolidated Plan [and any amendments] and Annual Performance Reports are placed in accessible locations [i.e., Cherokee County Administrative Offices, county web site, local city halls, library] in Cherokee County to permit public review and comment. All documentation is maintained in the Cherokee County CDBG Program Office, documenting the opportunities provided to citizens to insure that all meetings, records, documents and related information are made readily accessible to the citizens of Cherokee County.

3. CONSOLIDATED PLAN:

Before Cherokee County approves an amendment to the current Five-Year Consolidated Plan or Annual Action Plan, it provides information including the amount of financial assistance the County expects to receive from HUD, and the type of activities the County expects to undertake (including the amount that will benefit persons of very low and low income), the plans to minimize the displacement of persons and the assistance to be provided to any persons displaced, will be made available to residents, public agencies, and other interested parties.

A summary of the proposed Consolidated Plan Activity will be published in the official local newspaper of general circulation, the *Cherokee Tribune*, and copies of the Proposed Plan will be available at government offices, and/or other public places. The summary will describe the contents and purpose of the Consolidated Plan and will list locations where copies of the Plan can be reviewed. Substantial Amendments to the Plan will be advertised, and copies of each Amendment will also be made available to the general public. As required by HUD regulations, Cherokee County will provide a period of no less than thirty (30) calendar days from the date of public notice to receive comments from local citizens as it relates to each amendment.

Cherokee County will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan, and the County's use of HUD housing, community development, and human services assistance, [including all assistance provided to Cherokee County under the CDBG program] during the preceding year. Interested parties should contact the CDBG Program Office for such information. Reasonable requests will be satisfied at the time of the

CHEROKEE COUNTY CDBG PROGRAM

request. If more detailed information is desired, which requires compilation of data; such requests will be submitted to the Cherokee County CDBG Program Office in writing.

4. CRITERIA FOR CONSOLIDATED PLAN SUBSTANTIVE AMENDMENTS:

A Substantive Amendment is any deviation from the Strategic or Annual Action Plan that results in a significant change regarding the specific Goals, Objectives, Outputs, and Outcomes as referenced in the current Consolidated Plan.

Any potential Substantive Amendment to an existing Consolidated Plan shall meet the following criteria and will require an opportunity for public comment:

- A. To make a change in the allocation priorities or a change in the method of distribution of funds;
- B. To carry out an activity using funds from any program covered by the Consolidated Plan (including program income), ***not previously described*** in the Annual Action Plan;
- C. To change the original intent and purpose of an activity which is no longer applicable;
- D. The costs associated with a change in the scope of an activity must increase or decrease by fifty-one percent (51%);
- E. The location of an activity changes to the extent that it does not serve the target population as originally described in the Consolidated Plan.

5. ASSESSMENT OF FAIR HOUSING:

The Assessment of Fair Housing is intended to be conducted prior to beginning development of the Consolidated Plan and should help inform Consolidated Plan priorities, projects, and goals. The County will ensure its AFH is informed by meaningful community participation in the process of analyzing data: identifying fair housing issues and factors contributing to fair housing issues; and developing fair housing goals. In conducting the community participation process, the County will reach out to those populations who have historically experienced exclusion, including racial and ethnic minorities, limited English proficient (LEP) persons, and persons with disabilities. Two hearings will be held during the AFH process, one during development of the AFH and one after a draft has been prepared.

No later than the date of the first public hearing, the HUD-provided data and other supplemental data to be used in the AFH will be made available to residents for review and analysis. This availability of data may include a link to HUD's website where the data can be readily accessed. In the development of the AFH, the County will consult with other public and private agencies including Canton Housing Authority, other assisted housing providers, social service providers (including those focusing services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes), community-based and regionally-based organizations that represent protected class members, organizations that enforce fair housing laws, and regional government agencies involved in metropolitan-wide planning and transportation responsibilities.

Once complete, the draft AFH will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice will include a brief summary of the content and purpose

CHEROKEE COUNTY CDBG PROGRAM

of the draft AFH, the dates of the public display and comment period, the locations where copies of the draft document will be considered for action by the Board of Commissioners, and the anticipated submission date to HUD.

In the event the County wishes to revise the AFH after approval by HUD, the revised draft will follow the same public process as the first draft of the AFH, involving a hearing to receive feedback on the revised draft, a public comment period of at least 30 days, and formal action by the Board of Commissioners to adopt the revised report before being resubmitted to HUD.

6. TECHNICAL ASSISTANCE TO CITIZENS/AGENCIES:

The Cherokee County CDBG Program Office will continue to provide technical assistance to Cherokee County residents and agencies, particularly to those of very low and low income who request such assistance in developing project proposals, or who request other information (compliance requirements, program performance, funding information, etc.) outlined in the current Consolidated Plan. Project application forms are available and are distributed at no cost to all persons making a request. A “one-on-one” meeting will be arranged for individuals and groups representing such persons when necessary to explain the project eligibility, application and approval process and other implementation requirements. The Cherokee County CDBG Program Office staff will also meet with various non-profit organizations and individuals to provide other specific technical assistance related to housing, community development and human services programs, as requested. In addition, the Cherokee County CDBG Program Office will provide an annual technical assistance workshop for CDBG applicants to answer all questions and provide assistance in application preparation.

7. PUBLIC HEARINGS:

Cherokee County will conduct a minimum of five public hearings annually to obtain citizens comments and concerns and to respond to proposals and questions throughout the program year. The public hearings will be held at different stages of the program year. Where feasible, multiple hearings may be held in conjunction with one another; however, the community participation process that occurs during the development of the AFH cannot replace the separate community participation required in subsequent planning processes, such as the Consolidated Plan. All hearings will be held at locations accessible to people with disabilities. The Public Hearings will be properly advertised and documented and will include a list of attendees as well as any public comments received. Written minutes of the public hearing are available for review during normal business hours.

1. **Needs Assessment Public Hearing:** This hearing will be conducted annually to determine the nature and types of assistance needed to address Cherokee’s priority needs. The Hearing is held at the beginning of the annual planning cycle to solicit input from residents, public housing agencies, and social services organizations on housing, community, and economic development needs. Cherokee County will use the **Needs Assessment** Public Hearing to report to the citizens on prior year performance for its HUD assisted programs. A Summary of the Annual Performance Report (APR) will be available for review by the attendees.
2. **Proposed Projects Review:** A second Public Hearing is normally held at the close of the application cycle. The purpose of this Hearing is to present to the community all of the projects submitted for funding for the year. CDBG Program Office staff present to the public the results of the needs assessment process, including the proposed priorities for housing and non-housing

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needs, the proposed long and short term objectives for addressing those needs and the resources available for this purpose. In addition, participants are encouraged to provide input on the degree and extent to which proposed applications meet Cherokee County's priority needs.

3. **Proposed Consolidated Plan Review:** Using resident input from the second public hearing, Cherokee County will develop a strategic Consolidated Plan, or an Annual Action Plan. Activities proposed for funding with HUD housing and community development funds through Cherokee County will be reviewed and appropriate recommendations will be made to the Cherokee County Board of Commissioners by the CDBG Program staff [with input from the Office of the County Manager and the Community Services Department]. These recommendations will be advertised for public review and comment for 30 days. During this 30-day period a third public hearing will be conducted to provide ample opportunity for public comment. Once this process has finalized the Cherokee County Board of Commissioners will approve The Plan.
4. **Fair Housing Public Input:** At the beginning of the process of developing the County's Assessment of Fair Housing, a public hearing will be held to receive public input on fair housing issues. At this hearing, the County will make available HUD-provided maps and data on fair housing for review and analysis by attendees.
5. **Feedback on the Assessment of Fair Housing:** A second public hearing on the AFH will be conducted during or after the public comment period on the Assessment, during which the County will address identified factors contributing to fair housing issues and proposed fair housing goals and priorities for affirmatively furthering fair housing. After this hearing, the Cherokee County Board of Commissioners will consider adoption of the AFH.

8. NON-DISCRIMINATION POLICY/COMPLAINT REVIEW PROCESS:

It is the policy of Cherokee County to provide equal opportunity for services without regard to race, color, sex, age, national origin, religion, political affiliation, presence of handicap or disability, or familial status.

Persons who feel that they have been discriminated against or who have a complaint pertaining to the Cherokee County Consolidated Plan, Plan amendments, or Annual Performance Report, may file a complaint in writing to:

Cherokee County CDBG Program
1130 Bluffs Parkway
Canton, Georgia 30114
Attn: Laura Calfee, lcalfree@cherokeega.com

The complaint must contain the following information:

- (1) Name and address of the person(s) filing the complaint;
- (2) A description of the act or acts considered to be in violation;
- (3) Other available pertinent information which will assist in the review and resolution of the complaint.

CHEROKEE COUNTY CDBG PROGRAM

Such complaints should be filed within thirty (30) days of the alleged discriminatory act. A written response as to the disposition of the complaint will be issued by the Director no later than fifteen (15) working days following receipt of the complaint. A person who is dissatisfied with the response to complaint, or if the response is delayed more than fifteen (15) working days, may appeal in writing to:

Cherokee County Government
1130 Bluffs Parkway
Canton, Georgia 30114
Attn: Mr. Jerry Cooper, County Manager

A written response on the disposition of the complaint will be issued by the County Manager not later than (30) working days following the receipt of the complaint. If the complainant is dissatisfied with the response of the County Manager, he/she may submit the complaint, in writing, to:

United States Department of Housing and Urban Development
Georgia State Office of Community Planning and Development
Five Points Plaza
40 Marietta Street, N. W., 15th Floor
Atlanta, GA 30303-9812

No person shall intimidate, threaten, coerce, or discriminate against any person because he/she has made a complaint, testified, assisted, or participated in any matter in an investigation, proceeding, or hearing related to a complaint.

The identity of complainants shall be kept confidential, except to the extent necessary to carry out or conduct investigations, hearings, or judicial proceedings in any matter in an investigation, proceeding, or hearing related to a complaint.

9. CITIZEN COMMENTS:

Cherokee County will consider any comments or views of residents, agencies, or other interested parties received in writing or orally at Public Hearings, in preparation of the final Consolidated Plan, amendments to the Plan, or the Annual Performance Report. A summary of these comments will be included in the final **Consolidated Plan**, **Annual Action Plan**, **Assessment of Fair Housing** or **Annual Performance Report** [CAPER].

10. PROVISIONS FOR SPECIAL NEEDS:

Arrangements will be made to provide assistance to those with special needs. Anyone who desires provisions for special needs may contact the CDBG Program Office prior to the public hearings so that adequate arrangements can be made. Hearing impaired and other disabled persons who wish to participate in Public Hearings, and who need to have a person "sign" for them at the Public Hearing, should have someone contact the CDBG Program Office via phone at (770) 721-7807 or Email: lcalfee@cherokee.ga.com at least five (5) working days prior to the Public Hearing date.

CHEROKEE COUNTY CDBG PROGRAM

11. EXPEDITED PROCEDURES TO AMEND CONSOLIDATED PLANS:

In the event of a national, state, or local emergency declaration, the County has established expedited procedures for citizen participation in order to expedite or facilitate the use of grant funds. Concerning substantive amendments to the consolidated plan or action plan, notice of five days will be given for public hearings to seek comments on proposed amendments to the consolidated plan or action plan, and no less than five days will be offered for a comment period to accept written comments from the public. When in-person public meetings are not permitted, as in the case of an infectious disease pandemic or other public health threats, virtual public hearings or conference calls will be used to meet public hearing requirements. Instructions for participation in virtual meetings or conference calls will be published in the public notice in the County's legal organ along with instructions for those persons needing assistance for special needs. Public hearing agendas will be provided to citizens and interested parties prior to the date the meeting is held.

The County will provide timely responses to citizen inquiries within the comment period, and the public will have access to all questions and responses handled during the abbreviated comment period. The CDBG Program Office's webpage, the County's Communications Department, and other social media outlets will be utilized to expeditiously push real time information to the public and fulfill reasonable notice requirements.