



2023-2027



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Roswell
Grants Division
38 Hill Street, Roswell, GA 30075
www.roswellgov.com

Table of Contents

I.	EXECUTIVE SUMMARY	3
A.	Background	3
B.	Research Methodology.....	4
C.	Prior Impediments and Recommendations.....	6
D.	New Impediments to Fair Housing Choice and Recommendations.....	8
II.	COMMUNITY CHARACTERISTICS.....	8
A.	Historical Profile	8
B.	Demographic Profile	9
C.	Income Profile	13
D.	Employment Profile	17
E.	Housing Profile.....	18
F.	Public Housing Authority (PHA) Administrative Plan Review.....	26
G.	Segregation & Integration.....	27
III.	ACCESS TO OPPORTUNITY	31
A.	Overview of HUD-Defined Opportunity Factors.....	32
B.	Low Poverty Index	33
C.	School Proficiency Index	34
D.	Labor Market Engagement Index.....	35
E.	Transit Index	35
F.	Low Transportation Cost Index.....	36
G.	Jobs Proximity Index	37
H.	Environmental Health Index.....	37
IV.	LOCAL OPPORTUNITY FACTORS	38
A.	Unemployment	38
B.	Occupation by Industry.....	39
C.	Minimum Wage.....	39
D.	Educational Attainment.....	40
E.	Broadband Access	41
F.	Environmental Justice and Health	43
V.	ANALYSIS OF PUBLIC POLICY IMPEDIMENTS	44
A.	General Plan Land Use Element.....	44
VI.	FAIR HOUSING TRENDS AND COMPLAINTS	45

A.	Fair Housing Laws	45
B.	Complaints Filed With HUD	45
C.	Complaint Trends.....	49
D.	Hate Crimes.....	50
VII.	REVIEW OF PRIOR AND CURRENT ACTIONS TAKEN TO AFFIRMATIVELY FURTHER FAIR HOUSING	51
A.	Affirmatively Furthering Fair Housing	51
B.	Previous Impediments to Fair Housing Choice.....	52
VIII.	IMPEDIMENTS TO FAIR HOUSING CHOICE & RECOMMENDATIONS	53
A.	Impediment 1: Lack of Affordable Housing	53
B.	Impediment 2: Barriers Limiting Housing Choice	54
C.	Impediment 3: Lack of Fair Housing Awareness	54
IX.	CONCLUSION.....	55
X.	APPENDICES.....	56
A.	Notices and Publications for Community Participation	56
B.	Summary of Public Comments	56
C.	A.I. Survey & Results.....	56
D.	HUD Fair Housing Complaint Data	56

I. EXECUTIVE SUMMARY

A. Background

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

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

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

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

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

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

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

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

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Fair Housing Act, protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on race, color, national origin, religion, sex, familial status, and disability.

Why Assess Fair Housing?

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

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

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

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

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

HUD interprets these three certifying elements to entail:

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

B. Research Methodology

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

1. Primary Research – the collection and analysis of raw data that did not previously exist.
2. Secondary Research – the review of existing data and studies.

3. Quantitative Analysis – the evaluation of objective, measurable and numerical data.
4. Qualitative Analysis – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions and experiences.

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

Citizen Participation

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

The Fair Housing Survey was designed to collect input from a broad spectrum of the community and received responses from City of Roswell residents and non-residents. The survey consisted of 41 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 213 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the full survey respondents.

Surveys were received over from September 1, 2022 to September 20, 2022. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent “ballot stuffing”, the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

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

small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

C. Prior Impediments and Recommendations

Impediment 1: Fair Housing Education and Outreach

There is a continuing need to educate renters and homebuyers about their rights under the Fair Housing Act and to advise realtors, sellers, landlords, mortgage brokers, and the public in general about the Fair Housing Act and their obligations under the Act. Overall, there is a need to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

Recommendations:

The following activities were recommended to enhance strategies to increase education and outreach regarding fair housing issues:

- Outline the procedures and process to report or file a fair housing complaint.
- Publicize the procedures and process in the local newspaper; post in public buildings, social service agencies' offices, and print out fliers to pass out.
- Develop opportunities to educate tenants, landlords, sellers, and mortgage brokers.
- All essential documents, forms, and directions should be printed in English and Spanish, and a reference sheet in multiple languages should be attached to inform non-English speaking persons who to contact.
- Contact the Board of REALTORS to confirm their use of Fair Housing practices.
- Establish an arbitration process for fair housing complaints, which are filed on the basis of refusal to make reasonable accommodations.
- Proclaim April as "Fair Housing Month" if the City of Roswell.

The City of Roswell was recommended to promote fair housing choice in all areas of the City by:

- Develop a housing rehabilitation program with low-interest loans/grants in lower-income neighborhoods where there is the highest percentage of vacant and deteriorated housing.
- Study the possibility of a redevelopment area to promote new housing sites.
- Join the regional HOME Consortium to access funds for down payment assistance to promote home ownership for lower income households.
- Survey the existing residential, mixed-use residential/commercial, and vacant structures to better utilize space for additional housing.

Impediment 2: Continuing Need for Affordable Housing

The median value and cost to purchase a single-family house in the City of Roswell that is decent, safe, and sound is \$297,000; this limits the choice of housing for a 4-person family in Roswell, where the median household income is less than \$82,150. About a quarter (24.7%) of the existing homeowners in Roswell are spending more than 30% of their total income on housing cost, which

makes them cost burdened. Almost half (49.8%) of the existing renter households in Roswell are spending more than 30% of the total income on housing, which makes them cost burdened.

Recommendations:

It was recommended that the City use CDBG Funds for:

- Rehabilitation of existing houses owned and occupied by low- and moderate-income households.
- Construction of new affordable housing by a Community Based Development Organization (CBDO).
- Development of off-site infrastructure and hook-ups for low- and moderate-income housing.
- Acquisition of sites for affordable housing.

It was also recommended that the City use HOME Funds for

- Rehabilitation of existing houses owned and occupied by low- and moderate-income households.
- Construction of new affordable housing by a Community Housing Development Organization (CHDO).
- Construction of new affordable housing by a private developer.
- Acquisition of sites for affordable housing.
- Down payment assistance and closing costs for low- and moderate-income households

It was also recommended that the City use City or County Bond Funds for:

- Rehabilitation of existing housing for rental or ownership.
- Construction of new affordable housing by a private developer or non-profit housing agency.
- Down payment assistance and closing costs for low- and moderate-income households.

The City was also recommended to Increased Fees or Taxes to dedicated funding (i.e. Real Estate Transfer Tax) for affordable housing for:

- Rehabilitation of existing housing for rental or ownership.
- Construction of new affordable housing by a private developer or non-profit housing agency.
- Down payment assistance and closing costs for low- and moderate-income households.

Impediment 3: Economic Opportunities to Improve Housing Choice

There is a lack of economic opportunities in the City, which prevents lower-income households from increasing their income and thus their housing choice. The cost of housing in the City limits housing choice for government and public service employees.

Recommendations:

It was recommended that workforce housing based on the research and community input into the planning process, it is recommended that the City of Roswell undertake a study for “Workforce Housing.” The Workforce Housing Action Plan should contain the following elements: Background Narrative, Existing Housing Supply, Housing Marketing Study, Housing Development Regulations, Management, and Funding Resources.

Impediment 4: Continue to Review, Monitor, and Update Public Policies

Public policies such as building codes and zoning ordinances need to be annually reviewed. Furthermore, these policies affect the construction and rehabilitation of housing in the community and determine occupancy requirements, locations, and density of housing.

D. New Impediments to Fair Housing Choice and Recommendations

Impediment 1: Lack of Affordable Housing

There is a lack of affordable housing in the City of Roswell due to the City’s population growth and influx of higher priced housing construction. Construction costs are exacerbated by the City’s lack of available land to develop lower costs housing. This has created a high demand on a limited affordable housing supply, and a corresponding increase in the cost of rental and sales housing.

Impediment 2: Barriers Limiting Housing Choice

There are physical, economic, and social barriers (including older inaccessible housing for aging population, lack of diversity in housing, condition of housing in existing apartment complexes) in the City of Roswell which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the City’s population. For example, Roswell is perceived as a place for families while only 35 percent of families having children that reside in the home.

Impediment 3: Lack of Fair Housing Awareness

There is a continuing need to educate and promote the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA), awareness of discriminatory practices, and combat “NIMBYism.” Despite 53.65% of residents knowing their Fair Housing Right, a total of 67.37% did not know how or where to report fair housing issues. Survey respondents of believed that a lack of education about fair housing contributed to unreported problems.

II. COMMUNITY CHARACTERISTICS

A. Historical Profile

Roswell is a city located on GA Hwy 400 in Fulton County, Georgia, with an estimated population of 92,530. Roswell is the 9th largest city in the state of Georgia. Roswell is a historical suburb located approximately twenty miles north of Atlanta on the Chattahoochee River, most known historical homes and buildings, charming antique shops, and historical setting. A prime attraction for corporate headquarters, light industry, and high-tech businesses.

In 1828, Roswell King, an American enslaver, plantation manager, businessman, planter, and industrialist evaluated the area for commercial potential. In 1832, a survey was conducted as part of the Cherokee Purchase to distribute the Cherokee land to eligible white citizens in a land lottery. Roswell was originally located in Cobb County, Georgia until 1832 when it was annexed to Fulton County, Georgia. Roswell King returned with his sons in the mid-1830s to build a textile mill complex that was incorporated in 1839 as the Roswell Manufacturing Company.

Over the next decade, Roswell became known as the "Textile Mill Town". There were two distinct population classes, the wealthy elite and mill workers. The wealthy elite built elegant mansions a town square, a company store, a mill village, a Presbyterian church, and an academy for their class. Roswell Manufacturing Company became the largest cotton mill in north Georgia by 1860. The factory produced cotton cloth, yarn, rope, and tenting. The capital tripled and the number of employees doubled which contributed to a stable economy and phenomenal growth. On February 6, 1954, the Georgia General Assembly approved the charter for incorporation submitted by the local elite residents at the time.

During the Civil War, the cotton mills were destroyed, and more than 400 mill workers were charged with treason and sent to the North (Louisville, KY) as prisoners. After the war a cotton mill and the woolen factory were rebuilt. The shift in Roswell's image from textile mill town to small suburban community began. During the late nineteenth century some rural families began to move into town, creating new businesses and for the first time a significant middle class. By 1960, Roswell had civic clubs, parks, a library, and opportunities for new industries. Today, Roswell is a magnet for sightseers, conventioners, and tour groups looking for a historic district steeped in southern history and situated near Atlanta.

B. Demographic Profile

Demographic data was analyzed and obtained from the 2020 U.S. Census American Community Survey (ACS). The primary source of demographic data used in this study comes from the U.S. Census Bureau. The American Community Surveys (ACS) provides the most recent demographic data and essential information used to show the trends in population and household changes over the years.

Population

According to data, the City of Roswell experienced an estimated 0.408% increase in population, increasing from 94,498 in 2019 to 94,884 in 2020. The 2021 ACS 1 yr. estimates show a 2.4% decrease in population from 94,884 in 2020 to 92,530 in 2021. Roswell has seen its population grow at a rapid rate throughout its history. It's the 8th largest city in Georgia, with an estimated 50.62% males and 49.38% females.

Age and Sex Over the Years

According to the 2021 American Community Survey 1 Year Estimates, the median age of Roswell Residents is 37.5 years old. The largest concentration of residents is in the 20-44 age range, with 29,092 making up this population. The senior citizen population of 65 and over has remained constant, representing 11.68% of the population. Overall, the most significant demographic is 0-64 years old at 81,727. Recently, in terms of sex, males slightly outnumbered females within Roswell. That trend has varied during the period under review, as men edged out women 50.62% to 49.38% as of the 2021 census, contrary to 49.64% to 50.36% in 2019.

AGE	AGE & SEX POPULATION CHARACTERISTICS					
	2019			2021		
	Both Sexes	Male	Female	Both Sexes	Male	Female
Total Population	94,747	47,035	47,712	92,532	46,839	45,693
0 to 19 years	23,582	11,014	12,568	27,003	15,392	11,611
20 to 44 years	30,270	16,737	13,533	29,092	13,274	15,818
45 to 64 years	26,634	12,489	14,145	25,632	12,710	12,922
65 years and over	14,261	6,795	7,466	10,805	5,463	5,342
Median age (years)	39.3	37.8	40.8	37.5	35.8	37.9

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

Households

According to the 2021 ACS, 1 Year Estimates there are currently 37,044 households in Roswell, Georgia. The average household size overall is 2.49, and the family size is 3.05. This number differs slightly from the family size for a married couple which is 3.12.

HOUSEHOLD TYPE			
2019		2021	
In married-couple family	57.78%	In married-couple family	54.68%
In other households	42.22%	In other households	45.32%
MARITAL STATUS			
Never married	27.10%	Never married	31.10%
Now married, except separated	58.5%	Now married, except separated	55.80%
Divorced or Separated	11.30%	Divorced or Separated	10.30%
Widowed	3.10%	Widowed	2.80%
Average household size	2.62	Average household size	2.49
Average family size	3.09	Average family size	3.05

Table 2: U.S. Census Bureau ACS 2021 & 2019 1yr Estimates, www.census.gov

MARITAL STATUS				
Total	Married-couple family household	Nonfamily Household	Male householder, no wife present, family household	Female householder, no husband present, family household

Total households	37,044	20,257	12.362	1,128	3,297
Average household size	2.49	3.16	1.27	2.65	2.87
FAMILIES					
Total families	24,682	20,257	(X)	,1281	3,297
Average family size	3.05	3.12	(X)	2.52	2.77
UNMARRIED-PARTNER HOUSEHOLDS					
Same-sex	0.30%	n/a	n/a	n/a	n/a
Opposite sex	4.00%	n/a	n/a	n/a	n/a

Table 3: Source: U.S. Census Bureau ACS 2021 1yr Estimates, www.census.gov

Race and Ethnicity

Roswell, GA racial makeup consisted of 65.57% White; 12.55% Black or African American; 0.10% American Indian and Native Alaskan; 5.10% Asian; 0.00% Pacific Islander; 4.39% from some other races; and 12.30% from two or more races; 15.34% were Hispanic or Latino of any race.

RACE AND ETHNICITY		
	Number	Percentage
TOTAL POPULATION	92,532	100%
White	60,670	65.57%
Black or African American	11,615	12.55%
American Indian and Alaska Native	89	0.10%
Asian	4,718	5.10%
Native Hawaiian and Other Pacific Islander	0	0.00%
Some other race	4,060	4.39%
Two or more races	11,380	12.30%
HISPANIC OR LATINO AND RACE		
Hispanic or Latino	14,192	15.34%
Not Hispanic or Latino	78,340	84.66%

Table 4: Source: U.S. Census Bureau ACS Estimates, www.census.gov

Origin and Ancestry

According to U.S. Census Bureau, 2021 American Community Survey Estimates, there were approximately 11,750 Foreign-born individuals in Roswell, GA. There is no data to show what region the foreign-born population originated from; however, data does show that majority of the foreign-born population entered the area before 2010.

U.S. CITIZENSHIP STATUS		
Foreign-born	Foreign-born; Naturalized citizen	Foreign-born; Not a U.S. citizen
16,664	4,375	7,375

Table 5: Source: U.S. Census Bureau ACS Estimates, www.census.gov

REGION OF BIRTH OF FOREIGN-BORN	
Foreign-born population excluding population born at sea	NO DATA

Europe	NO DATA
Asia	NO DATA
Africa	NO DATA
Oceania	NO DATA
Latin America	NO DATA
Northern America	NO DATA

Table 6: Source: U.S. Census Bureau ACS Estimates, www.census.gov

The following table presents the ancestry of Roswell residents in 2020. The most common origins identified other than American (9.91%) were English (7.91%), German (5.03%), and Irish (4.42%).

Ancestry	Number	Percent %
Total Reported	55,482	100%
American	5,498	9.91%
Arab	706	1.27%
Armenian	18	0.03%
Australian	10	0.02%
Austrian	106	0.19%
Belgian	6	0.01%
Brazilian	799	1.44%
British	774	1.40%
Bulgarian	24	0.04%
Canadian	367	0.66%
Celtic	11	0.02%
Croatian	7	0.01%
Czech	156	0.28%
Danish	91	0.16%
Dutch	232	0.42%
Eastern European	417	0.75%
English	4,386	7.91%
European	1,668	3.01%
French (except Basque)	322	0.58%
French Canadian	211	0.38%
German	2,788	5.03%
German Russian	12	0.02%
Greek	242	0.44%
Guyanese	51	0.09%
Hungarian	78	0.14%
Iranian	328	0.59%
Irish	2,453	4.42%
Israeli	164	0.30%
Italian	2,091	3.77%
Latvian	21	0.04%
Lithuanian	126	0.23%

Northern European	271	0.49%
Norwegian	142	0.26%
Polish	665	1.20%
Portuguese	102	0.18%
Romanian	15	0.03%
Russian	511	0.92%
Scandinavian	36	0.06%
Scotch-Irish	953	1.72%
Scottish	724	1.30%
Slavic	6	0.01%
Slovak	43	0.08%
Sub-Saharan African:	1,284	2.31%
Swedish	207	0.37%
Swiss	48	0.09%
Turkish	77	0.14%
Ukrainian	205	0.37%
Welsh	186	0.34%
West Indian (except Hispanic groups):	1,068	1.92%
Other groups	24,776	44.66%

Table 7: Source: U.S. Census Bureau ACS Estimates, www.census.gov

Limited English Proficiency

Section 601 of Title VI, the Civil Rights Act of 1964, is the federal law that protects individuals from discrimination based on their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is discrimination based on a person's inability to speak, read, write, or understand English. In certain situations, failure to ensure that LEP persons can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act consistent with the national origin data, English is, by far, the most spoken language among the residents of Roswell, GA. The LEP population of Roswell, GA is relatively small in comparison to regional levels. There is roughly 10.30% of the population that speak other languages, and 2.30% speak English less than very well.

LANGUAGE SPOKEN AT HOME	2021
Population 18 years and over	59,725
English only	89.70%
Language other than English	10.30%

Table 8: Source: U.S. Census Bureau 2018 ACS Estimates, www.census.gov

C. Income Profile

The income and poverty profile presents an overview of household income, data elements that include household size, low-income population, and percentage of median family households in poverty. As noted in the table below, the median household income for Roswell decreased from

\$109,805 in 2019 to \$104,825 in 2021, while the mean family income also decreased from \$155,429 in 2019 to \$143,077 in 2021.

HOUSEHOLD INCOME				
	2019		2021	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	35,944	100%	37,044	100%
Less than \$10,000	683	1.9%	1,297	4%
\$10,000 to \$14,999	503	1.4%	370	1%
\$15,000 to \$24,999	1,294	3.6%	1,074	3%
\$25,000 to \$34,999	1,941	5.4%	2,704	7%
\$35,000 to \$49,999	2,911	8.1%	1,778	5%
\$50,000 to \$74,999	4,673	13.0%	6,075	16%
\$75,000 to \$99,999	3,487	9.7%	4,668	13%
\$100,000 to \$149,999	7,836	21.8%	5,890	16%
\$150,000 to \$199,999	4,852	13.5%	4,779	13%
\$200,000 or more	7,764	21.6%	8,409	23%
Median Household Income	\$109,805		\$104,825	
Mean Family Income	\$155,429		\$143,077	

Table 9: Source: U.S. Census Bureau ACS Estimates, www.census.gov

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

2021 CDBG MAXIMUM HOUSEHOLD INCOME LIMITS			
Household Size	Extremely Low	Very Low-Income 50%	Low Income 80%
1	\$17,750	\$29,550	\$47,250

2	\$20,250	\$33,750	\$54,000
3	\$22,800	\$37,950	\$60,750
4	\$26,500	\$42,150	\$67,450
5	\$31,040	\$45,550	\$72,850
6	\$35,580	\$48,990	\$78,250
7	\$40,120	\$52,300	\$83,650
8	\$44,660	\$55,650	\$89,050

Table 10: Source: U. S. Department of Housing and Urban Development (HUD)
<https://www.huduser.gov/portal/datasets/il/il2021/2021summary.odn>

As depicted in the following Low- and Moderate-Income Block Group Map, the low and moderate-income census tracts are generally located in the central and southwest sections of the city. There is some overlap of higher minority concentration in the low- and moderate-income census tracts in the south-central area.

ROSWELL, GA LOW- AND MODERATE-INCOME BLOCK GROUPS

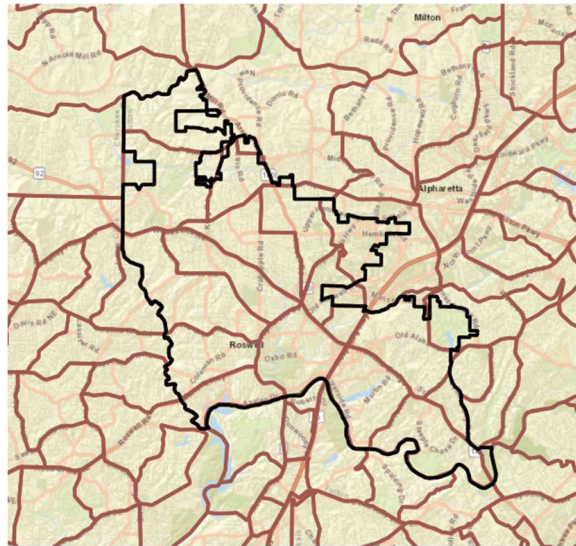


Figure 1: Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

Percentage of Poverty in Roswell

There is an estimated 8.80% of residents living below poverty in Roswell, GA. Majority of the population affected is children under five who represent 21.20% of the below poverty population.

Roswell below poverty population is highlighted in the chart below:

	Total	Below poverty level	Percent below poverty level
Population for whom poverty status is determined	92,318	8,133	8.80%
AGE			
Under 18 years	24,395	2,975	12.20%
Under 5 years	4,408	936	21.20%
5 to 17 years	19,987	2,039	10.20%
Related children of householder under 18 years	24,158	2,975	12.30%
18 to 64 years	57,332	4,423	7.70%
18 to 34 years	17,542	2,445	13.90%
35 to 64 years	39,790	1,978	5.00%
60 years and over	15,711	735	4.70%
65 years and over	10,591	735	6.90%

Table 11: Source: 2021 American Community Survey 1yr Estimates, www.census.gov

On February 14, 2019, HUD CPD-10-02 Notice updated the Department's Low- and Moderate-Income Summary Data (LMISD) based on the American Community Survey data. These data sets will replace the prior LMISD data set to demonstrate compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis ("Area Benefit" or LMA). The table below highlights the current low- and moderate-income block groups that have a population of more than 39.8% down- and moderate-income.

State	City	TRACT	Block Group	Number of Low Mod	Low Mod Universe	Low Mod Percent
Georgia	Roswell	011412	3	1,325	3,325	39.85%
Georgia	Roswell	011421	1	955	2,275	41.98%
Georgia	Roswell	011405	1	780	1,750	44.57%
Georgia	Roswell	011405	2	470	1,035	45.41%
Georgia	Roswell	011422	1	1,445	3,040	47.53%
Georgia	Roswell	011611	3	1,500	3,110	48.23%
Georgia	Roswell	011405	4	1,420	2,735	51.92%
Georgia	Roswell	011414	4	1,175	2,150	54.65%
Georgia	Roswell	011411	3	1,570	2,665	58.91%
Georgia	Roswell	011414	1	1,405	2,175	64.60%

Georgia	Roswell	011405	3	1,690	2,345	72.07%
Georgia	Roswell	011420	3	1,670	2,260	73.89%
Georgia	Roswell	011421	2	1,185	1,570	75.48%
Georgia	Roswell	011420	1	1,210	1,575	76.83%
Georgia	Roswell	011420	2	3,215	3,990	80.58%

D. Employment Profile

Data regarding the labor force, defined as the total number of persons working or looking for work and employment is gathered from the Bureau of Labor Statistics are presented below.

UNEMPLOYMENT RATES IN ROSWELL				
Year	2018	2019	2020	2021
Unemployment Rate	3.9%	3.4%	6.8%	3.9%

Table 12: Source: Bureau of Labor Statistics, Local Area Unemployment Statistics, <https://data.bls.gov/cgi-bin/surveymost>

Jobs Held by Residents

In 2021, approximately 55% of Roswell's civilian employed population of residents 16 years of age and over were part of the labor force; according to the 2021 American Community Survey. The following charts illustrate the categories of workers and their occupations.

The largest portion of Roswell workers is in management, business, science, and arts occupations. Almost a quarter of all workers are in "sales occupations," while less than 20.00% are in "service and office occupations."

OCCUPATION CHARACTERISTICS		
Occupations of Roswell Residents	Estimated number of Residents	% Employed by Occupation
<i>Civilian employed population 16 years and over</i>	<i>50,770</i>	<i>100.00%</i>
Management, business, science, and arts	30,403	59.88%
Service	4,740	9.34%
Sales and office	11,423	22.50%
Natural resources, construction, and maintenance	1,459	2.87%
Production, transportation, and material moving	2,745	5.41%

Table 13: Source: 2021 American Community Survey 1 yr. Estimates, www.census.gov

Workers had a mean travel time to work of approximately 27 minutes. According to the 2021 American Community Survey, an estimated 20.20% of households in Roswell receive income from Social Security. The mean Social Security Income for 2019 was \$20,875. Most workers (81.50%) in Roswell were classified as Private Wage and Salary Workers, as of 2019.

WORKING-CLASS CHARACTERISTICS		
Working Class in Roswell	Estimated number of Residents	% Employed by Worker Class
<i>Civilian employed population 16 years and over</i>	50,770	100.00%
Private for-profit wage and salary workers	39,271	77.35%
Private not-for-profit wage and salary workers	4,260	8.39%
Local government workers	2,588	5.10%
State government workers	656	1.29%
Federal government workers	690	1.36%
Self-employed in own not incorporated business workers and unpaid family workers	3,305	6.51%

Table 14: Source: 2021 American Community Survey, www.census.gov

Major Employers

The top employment markets for Roswell are Professional, Scientific, Management, Administrative, and Waste Management (19.08%), Educational services, health care, and social assistance (16.91%), Finance and Insurance (14.26%), and Retail (13.03%).

INDUSTRY		
Industry Sector	Number of Employees	Percentage
<i>Civilian employed population 16 years and over</i>	35,136	100%
Agriculture, forestry, fishing and hunting, and mining	0	0.00%
Construction	1,874	5.33%
Manufacturing	2,904	8.27%
Wholesale trade	2,369	6.74%
Retail trade	4,578	13.03%
Transportation and warehousing, and utilities	1,061	3.02%
Information	1,902	5.41%
Finance and insurance, and real estate and rental and leasing	5,010	14.26%
Professional, scientific, management, administrative and waste mgmt.	6,704	19.08%
Educational services, and health care and social assistance	5,941	16.91%
Arts, entertainment, and recreation, and accommodation and food services	907	2.58%
Other services, except public administration	1,127	3.21%
Public administration	759	2.16%

Table 15: Source: 2021 American Community Survey 1yr. Estimates, www.census.gov

E. Housing Profile

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

Characteristics of Housing

The predominant housing type in Roswell remains single-family detached homes which accounted for 56.60% percent of Roswell’s housing stock in 2021. Roswell housing stock was comprised of 24,648 housing units in 2019; since then, 12,396 housing units were added to the housing inventory which consists of 37,044 total housing units in 2021.

Of the total housing units in Roswell in 2021, 20,954 (56.57%) were single-family detached housing units and 5,362 (14.47%) were single-family attached housing units. There are 3,704 (10.00%) 2-9 units, and 6,976 (18.83%) 10 or more units according to the 2021 ACS 1-year estimates. Roswell also has 48 (0.13%) mobile home structures in its inventory. There are no documented boats, RVs, and vans.

UNITS IN STRUCTURE	2019	Percent (%)	2021	Percent (%)
<i>Total Housing Units</i>	<i>24,648</i>	<i>100%</i>	<i>37,044</i>	<i>100%</i>
1-unit detached	20,418	82.80%	20,954	56.57%
1-unit attached	3,456	14.00%	5,362	14.47%
2 Units	77	0.30%	90	0.24%
3 or 4 Units	212	0.90%	671	1.81%
5 to 9 Units	50	0.20%	2,943	7.94%
10 or more units	364	1.50%	6,976	18.83%
Manufactured or Mobile Homes	71	0.30%	48	0.13%
Boat, RV, van, etc.	0	0.00%	0	0.00%

Housing Supply

According to the 2021 American Community Survey (ACS), Roswell has 37,044 occupied housing units. Of these units, 69.33 percent are owner-occupied, and 30.67 percent are renter-occupied. Vacancy rates are an indicator of housing needs. While vacancies help moderate housing costs, excess vacancies depress rents and home values. Generally, an “optimal” vacancy rate is 1.5 percent to 2.0 percent in the for-sale market and 5.0 percent to 6.0 percent for the rental market. According to the 2021 ACS 1yr estimates, the vacancy rate among homeowners is 0.9 percent; among renters, 5.3 percent. These percentages indicate a high level of utilization of the available housing units.

Housing Tenure	2019	Percent (%)	2021	Percent (%)
-----------------------	-------------	--------------------	-------------	--------------------

Occupied Housing Units	35,944	100%	37,044	100%
Owner-Occupied	24,648	68.57%	25,681	69.33%
Renter-Occupied	11,296	31.43%	11,373	30.67%
Housing Occupancy Status	2010	Percent (%)	2020	Percent (%)
Total Housing Units	36,344	100%	38,032	100%
Occupied Housing Units	33,945	93.40%	36,163	95.09%
Vacant Housing Units	2,399	6.60%	1,869	4.91%
Homeowner Vacancy Rate	1.4	(x)	0.9	(x)
Rental Vacancy Rate	5.6	(x)	5.3	(x)

Table 16 Source: U.S. Census Bureau, 2021 ACS 1-Year Estimates, www.census.gov

Housing Condition – Age

Like any other asset, houses gradually deteriorate over time. If not maintained, housing can deteriorate into disrepair, depress neighboring property values, discourage reinvestment, and impact the quality of life in an entire neighborhood. Maintaining quality housing is an important community goal.

This section analyzes and discusses the age and condition of Roswell housing. Much of the housing stock in Roswell has aged, as evidenced by 54.90 percent of the housing stock being built between 1980 and 1999. In the housing industry, generally, homes older than 30 years begin to require major investments to maintain quality. Necessary improvements include siding, painting, and roofing, among others. After 50 years, homes typically need new plumbing, electrical systems, mechanical systems, lead-based paint removal, and other major repairs.

AGE OF HOUSING STOCK: YEAR UNIT BUILT BY TENURE		
	2021	Percentage (%)
Total Housing Units	37,044	100%
Built 2020 or later	285	0.80%
Built 2010 to 2019	3,891	10.50%
Built 2000 to 2009	5,052	13.60%
Built 1980 to 1999	20,339	54.90%
Built 1960 to 1979	6,601	17.80%
Built 1940 to 1959	469	1.30%
Built 1939 or earlier	407	1.10%
Built 2020 or later	285	0.80%
Built 2010 to 2019	3,891	10.50%
Built 2000 to 2009	5,052	13.60%

Table: Source: U.S. Census Bureau, 2021 ACS 1-Year Estimates, www.census.gov

Housing Costs

Owner Occupied Housing

Per the U.S. Census Bureau, the median value for a home in 2021 was \$483,900. In 2021, the largest percent of homes were valued between \$300,000 and \$499,999 (41.70%).

HOUSING VALUES		
	2021	Percentage (%)
<i>Owner-occupied units</i>	<i>18,349</i>	<i>100%</i>
Less than \$50,000	54	0.30%
\$50,000 to \$99,999	0	0.00%
\$100,000 to \$149,999	2,051	11.20%
\$150,000 to \$199,999	7,657	41.70%
\$200,000 to \$299,999	6,080	33.10%
\$300,000 to \$499,999	1,975	10.80%
\$500,000 to \$999,999	532	2.90%
\$1,000,000 or more	54	0.30%
<i>Median (Dollars)</i>	<i>483,900</i>	<i>(X)</i>

Table 17: Source: U.S. Census Bureau, 2021 ACS 1-Year Estimates, www.census.gov

The median Selected Monthly Owner Costs (SMOC) for households with a mortgage in Roswell was \$2,155.00. The median SMOC for non-mortgage holders is 655.00. According to the 2020 5yr estimates, there was a total of 18,462 households with a mortgage. About 24.90% (4,593) of the households were paying between \$1,500 and \$1,999 in monthly housing costs.

MORTGAGE STATUS		
	Estimate	Percent
<i>Owner-occupied units</i>	<i>24,450</i>	<i>100%</i>
Housing units with a mortgage	18,462	75.51%
Housing units without a mortgage	5,988	24.49%
SELECTED MONTHLY OWNER COSTS (SMOC)		
<i>Housing units with a mortgage</i>	<i>18,462</i>	<i>100.00%</i>
Less than \$200	0	0.00%
\$200 to \$399	0	0.00%
\$400 to \$599	65	0.40%
\$600 to \$799	306	1.70%
\$800 to \$999	514	2.80%
\$1,000 to \$1,499	2,514	13.60%
\$1,500 to \$1,999	4,593	24.90%
\$2,000 to \$2,499	4,006	21.70%
\$2,500 to \$2,999	2,885	15.60%
\$3,000 or more	3,579	19.40%
<i>Median (dollars)</i>	<i>2,155</i>	<i>(X)</i>
<i>Housing units without a mortgage</i>	<i>5,988</i>	<i>100%</i>
Less than \$200	504	1.00%
\$200 to \$399	61	6.70%
\$400 to \$599	401	32.90%
\$600 to \$999	1,968	40.60%

\$1,000 to \$1,299	2,430	12.30%
\$1,300 to \$1,499	736	4.10%
\$1,500 or more	244	2.50%
Median (dollars)	655	(X)
SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME (SMOCAPI)		
Housing units with a mortgage (excluding units where SMOCAPI cannot be computed)	18,462	100%
Less than 2.0	5,641	30.60%
2.0 to 2.9	5,749	31.10%
3.0 to 3.9	2,719	14.70%
4.0 or more	4,244	23.00%
Not computed	109	0.60%
Housing unit without a mortgage (excluding units where SMOCAPI cannot be computed)	5,988	100%
Less than 2.0	1,484	24.80%
2.0 to 2.9	845	14.10%
3.0 to 3.9	1,005	16.80%
4.0 or more	2,635	44.00%
Not computed	19	0.30%

Table 18: Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates, www.census.gov

Fair Market Rents

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2021, 46.30% of renter households were cost-burdened which was a decrease from 2019 when the data showed 48.420% of renter households being cost-burdened. While rents in real dollars have increased, renter housing costs burdens have decreased as renter household incomes increased. The following table illustrates the housing costs for renter households according to the 2019 American Community Survey.

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

The area median rent is estimated at \$1,300, according to the 2021 ACS 1yr estimates, which is higher than the 2-bedroom rent limit. The average rents commercially tend to exceed the area median rent and the fair market rent limits. The rental market in Roswell is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents

in the area. The 2021 HUD Fair Market Rents and HOME Rent Limits for the Roswell, GA HUD MSA are shown in the table below.

HUD FAIR MARKET RENT RATES		
# of Bedrooms Limit	2021	2022
Efficiency	\$1,016	\$1,111
1	\$1,040	\$1,131
2	\$1,185	\$1,289
3	\$1,491	\$1,596
4	\$1,823	\$1,951

Table 19: Source: HUD Fair Market Rent,

https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2022_code/2022summary.odn?cbsasub=METRO12060M12060&year=2022&fmrtype=Final&dallas_sa_override=TRUE

The National Low Income Housing Coalition’s “Out of Reach” 2021 Annual Report calculates the amount of money a household must earn in order to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD’s affordability standard of paying no more than 30% of income for housing costs. Data is presented in the Renter Affordability table for Fulton County Metro Statistical Area (MSA).

As noted in the 2021 Out of Reach Report, the NLIHC estimates that the median income for a renter in the Fulton County MSA is \$51,983.00. The Area’s Fair Market Rent (FMR) for a two-bedroom apartment is \$1,289 and to afford this level of rent and utilities, without paying more than 30% of income on housing, one would need to work at a minimum of 137 hours per week or maintain at least 3.1 full-time jobs in Roswell.

	Georgia	Fulton County
Number of Households		
TOTAL	3,830,264	427,379
RENTER	1,377,105	201,476
PERCENT RENTERS	36%	47%
Housing Wage		
ZERO-BEDROOM	\$17.51	\$21.37
ONE-BEDROOM	\$18.09	\$21.75
TWO-BEDROOM	\$20.97	\$24.79
THREE-BEDROOM	\$26.68	\$30.69
FOUR-BEDROOM	\$32.14	\$37.52
Fair Market Rent		
ZERO-BEDROOM	\$911	\$1,111
ONE-BEDROOM	\$941	\$1,131
TWO-BEDROOM	\$1,090	\$1,289
THREE-BEDROOM	\$1,387	\$1,596
FOUR-BEDROOM	\$1,671	\$1,951
Annual Income Needed to Afford		
ZERO-BEDROOM	\$36,423	\$44,440
ONE-BEDROOM	\$37,622	\$45,240
TWO-BEDROOM	\$43,618	\$51,560
THREE-BEDROOM	\$55,490	\$63,840
FOUR-BEDROOM	\$66,847	\$78,040
Minimum Wage		
MINIMUM WAGE	\$7.25	\$7.25
RENT AFFORDABLE FOR A FULL-TIME WORKER AT MINIMUM WAGE	\$377	\$377
Work Hours/Week at Minimum Wage		
ZERO-BEDROOM	97	118
ONE-BEDROOM	100	120
TWO-BEDROOM	116	137
THREE-BEDROOM	147	169
FOUR-BEDROOM	177	207
Supplemental Security Income (SSI) Payment		
SSI MONTHLY PAYMENT	\$841	\$841
RENT AFFORDABLE TO SSI RECIPIENT	\$252	\$252

Figure 2: Source: National Low Income Housing Coalition, 2021 Out of Reach, <https://nlihc.org/oor/state/ga>

Household Housing Problems

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

more. As reflected below, Roswell has less than 1 percent of households that lack plumbing and kitchen facilities.

SELECTED HOUSING CHARACTERISTICS		
Occupied housing units	37,044	
Lacking complete plumbing facilities	44	0.12%
Lacking complete kitchen facilities	44	0.12%
No telephone service is available	Not Available	(X)

Table 20: Source: 2021 ACS 1yr Estimates, www.census.gov

According to the most recent, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD, less than 35% of all households are experiencing housing problems and less than one percent of those households experience severe housing problems. A review of data provides an overall view of the housing needs including number and type of household and those experiencing housing problems including substandard conditions, overcrowding, and cost burdens, for both renters and owners.

COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY			
Housing Problems Overview 1	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	3,900	5,405	9,305
Household has none of 4 Housing Problems OR cost burden not available, no other problems	19,590	5,485	25,075
Total	23,490	10,890	34,380
Severe Housing Problems Overview 2	Owner	Renter	Total
Household has at least 1 of 4 Severe Housing Problems	1,700	2,730	4,430
Household has none of 4 Housing Problems OR cost burden not available, no other problems	21,790	8,165	29,955
Total	23,490	10,890	34,380
Housing Cost Burden Overview 3	Owner	Renter	Total
Cost Burden <=30%	19,535	5,895	25,430
Cost Burden >30% to <=50%	2,210	2,825	5,035
Cost Burden >50%	1,610	2,095	3,705
Cost Burden not available	130	85	215
Total	23,490	10,890	34,380

Table 21: Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, <https://www.huduser.gov/portal/datasets/cp.html>

Special Housing Needs

According to The U.S. Department of Housing and Urban Development, “special populations” are considered to be the elderly (those over 65 years old) and persons with disabilities. A further breakdown of the “Special Housing Needs” profile would include those with mental and physical disabilities and substance abuse concerns. The total population of disabled persons in Roswell is estimated to be 8,167 persons which represent 8.85% of the noninstitutionalized population in Roswell. The following table includes the 2021 ACS 1yr estimates for the number of disabled individuals in Roswell.

DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION		
Total Civilian Noninstitutionalized Population	92,318	100.00%
With a disability:	8,167	8.85%
Hearing difficulty	2,622	(X)
Vision difficulty	1,871	(X)
Cognitive difficulty	3,608	(X)
Ambulatory difficulty	2,709	(X)
Self-care difficulty	2,043	(X)
Independent living difficulty	2,060	(X)
No disability	84,151	91.15%

F. Public Housing Authority (PHA) Administrative Plan Review

This Roswell Housing Authority [RHA] was established in 1950 to improve the quality of life of low and moderate-income residents of the City of Roswell. The purpose of the public housing authority is to provide affordable homes and services in an environment that promotes dignity and pride. RHA goal is to create opportunities for residents to achieve self-sufficiency and economic independence. RHA is governed by a six-member Board of Commissioners appointed to three-year terms by the Mayor of the City of Roswell, Georgia. This includes one resident commissioner.

It is governed under U.S. Housing Act of 1937 as amended, the Acts of the Georgia Legislature, O.C.G.A. Title 8, Chapter 3, Articles 1-137, and by authorization of the City of Roswell City Council through the formation of an on-going Cooperation Agreement. RHA is recognized as a public body corporate and politic "Public Housing Authority" by the United States of America Department of Housing and Urban Development and the State of Georgia.

The Roswell Housing Authority owns and operates 95 units of project-based rental housing that includes 40 units for the elderly and persons with disabilities, and 55 units of family housing. RHA also owns a 29-unit apartment complex that is not subsidized but has rents structured below market rates for workforce housing. The Roswell Housing Authority does not administer any housing choice vouchers.

Other subsidized housing options within the County, include low-income housing tax credit multifamily developments. According to HUD's Low-Income Housing Tax Credit [LIHTC] database, the County has 1,548 low-income units located throughout the County.

Persons with Disabilities & Elderly

Aging residents are more likely to have needs related to accommodations for disabilities. As a protected class, persons with disabilities have a right to fair housing choice, yet the housing needs of this population can diverge significantly from the needs of other groups. People with mobility impairments are likely to need housing with features that improve accessibility and facilitate

maneuverability within the unit, (i.e., first floor units, elevators, ramps, floor level bathrooms tubs. etc.) Persons with visual and hearing deficiencies may need housing accommodations for service animals, alternative types of fire and smoke alarms, alternative phone services, communications in braille, etc. Based on HUD's Resource Locator for affordable housing for elderly and special needs persons, there are no specified housing units for seniors or disabled adults in Roswell, GA.

G. Segregation & Integration

Segregation Indices

Residential segregation can be measured using statistical tools called the dissimilarity index and the isolation index. These indices measure the degree of separation between racial or ethnic groups living in a community. An extreme example of segregation would be an exactly equivalent split between predominantly high income, White, suburban communities and low income, minority, inner-city neighborhoods. For this analysis, racial statistics for each census tract in the municipality were compared. Since White residents are the majority in the City of Roswell, all other racial and ethnic groups were compared to the White population as a baseline.

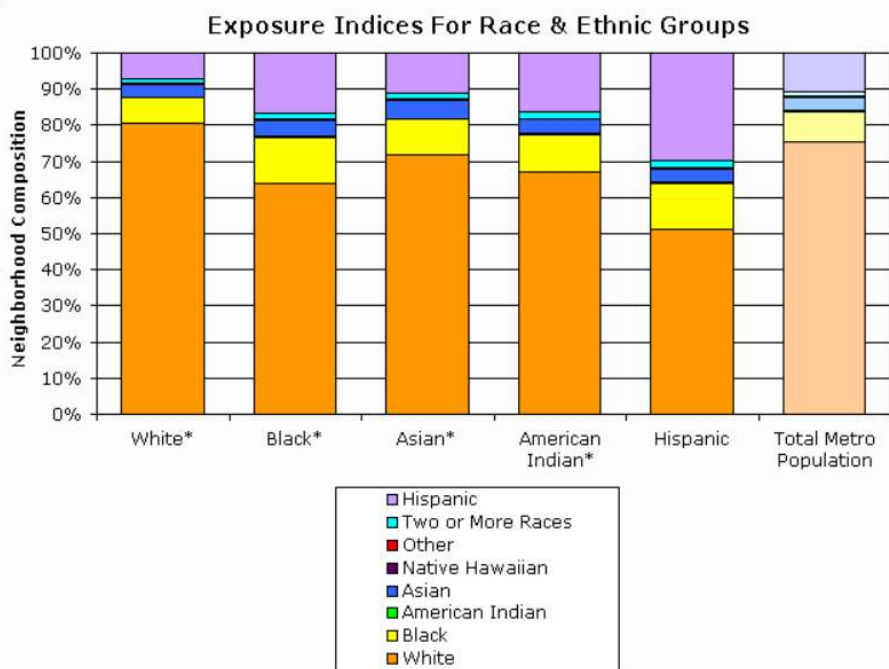
The index of dissimilarity allows for comparisons between subpopulations (i.e. different races), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. Typically, a score under 30 is considered low, between 30 and 60 is moderate, and above 60 is high.

The index of isolation compares the proportion of a group in a neighborhood to the proportion of the group in a larger area. Conceptually, the isolation index measures the extent of exposure or the probability that a member of a minority group will interact with only other members of that group. For example, if Hispanics tend to live in almost entirely Hispanic neighborhoods, the isolation index will be high. The isolation index is rated on a scale from 0 to 100, in which a score of 0 corresponds to maximum interaction and a score of 100 represents complete isolation. Dissimilarity and isolation are related to each other. The main difference is that the dissimilarity index does not take into account the relative size of the groups, but the isolation index does.

The history of housing segregation is marked by implicit and explicit forms of social and spatial discrimination including redlining, segregation, and disparities in lending. The result of these practices around the country was the enactment of the Fair Housing Act in 1968, which was designed to address inequality in mortgage lending and homeownership and curb explicit discriminatory practices by landlords who avoided renting to minorities. Since the enactment of the FHA, progress has been made, but patterns of segregation and housing discrimination remain

major impediments to social and economic mobility for those identified as protected classes. This chapter explores segregation and integration patterns in the City of Roswell using federal and local data to understand segregation and its impact on city residents.

Unless there is complete integration, the average racial composition of neighborhoods where whites live differs from the average racial composition of neighborhoods lived in by blacks, by Hispanics, or by other groups. To examine this, we calculate the average racial composition of neighborhoods experienced by members of each racial group. These are sometimes referred to as "exposure indices". This is because they show the exposure a given race group experiences with members of their own and each other race (percentage to 100) in an average neighborhood of the city (or metropolitan area) being examined. In the table below, the first five columns represent the average racial composition of the neighborhood of a person of a given race.



Exposure Indices for Racial Groups

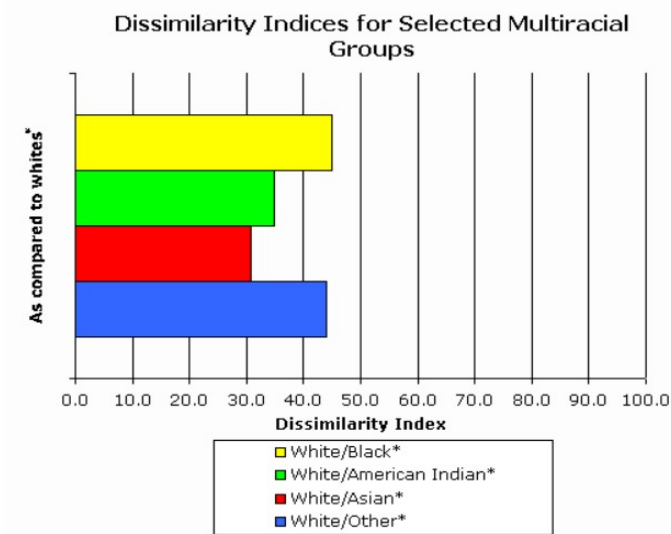
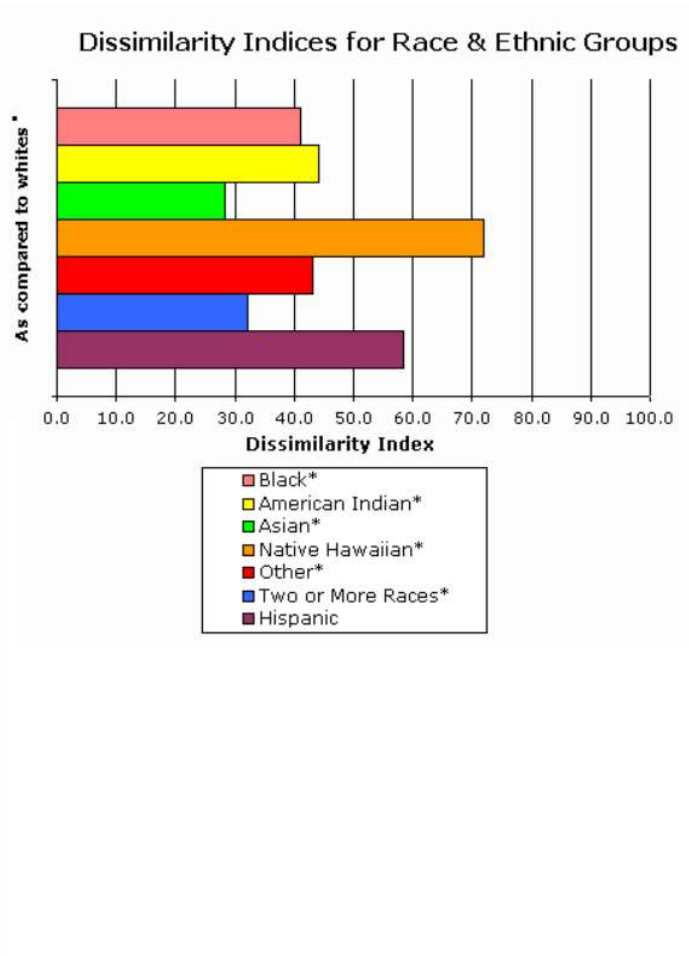
	White*	Black*	American Indian*	Asian*	Native Hawaiian*	Other*	Mixed*	Hispanic	Total
White*	80.6%	7.1%	0.1%	3.5%	0.0%	0.2%	1.3%	7.2%	100.0%
Black*	63.7%	13.0%	0.2%	4.4%	0.0%	0.3%	1.9%	16.5%	100.0%
Asian*	72.0%	9.8%	0.1%	5.0%	0.0%	0.3%	1.7%	11.0%	100.0%
American Indian*	66.9%	10.6%	0.4%	3.7%	0.1%	0.3%	1.8%	16.3%	100.0%
Hispanic	51.0%	13.0%	0.2%	3.8%	0.0%	0.3%	2.0%	29.7%	100.0%
Total Metro Population	75.5%	8.3%	0.1%	3.7%	0.0%	0.2%	1.5%	10.6%	100.0%

* Non-Hispanic only.

Figure 3: Census Scope, https://censuscope.org/us/s13/p67284/chart_exposure.html

Dissimilarity Indices

The dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. If a city's white-black dissimilarity index were 65, that would mean that 65% of white people would need to move to another neighborhood to make whites and blacks evenly distributed across all neighborhoods.



Dissimilarity Index With Whites*	Population**	Percent of Total Population
--	59,870	75.47%
41.0	6,620	8.34%
44.1	107	0.13%
28.2	2,932	3.70%
72.0	23	0.03%
43.1	194	0.24%
32.1	1,167	1.47%
45.0	140	0.18%
34.9	155	0.20%
30.8	213	0.27%
44.0	244	0.31%
--	415	0.52%
58.3	8,421	10.61%
--	79,334	100.00%

Figure 4: Census Scope, https://censusscope.org/us/s13/p67284/chart_dissimilarity.html

When a group's population is small, its dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Thus, when a group's population is less than 1,000, exercise caution in interpreting its dissimilarity indices. According to the Dissimilarity index 41 percent of Whites would need to move to another neighborhood to evenly distribute race and ethnic groups across neighborhoods. When compared to other cities in Georgia in the following table, the City ranked 7th lowest on the Dissimilarity Index.

SEGREGATION: DISSIMILARITY INDICES

Georgia Cities Ranked by White/Black Dissimilarity Index

Rank	City	Black Population	White Population	Total Population	Dissimilarity Index
1.	Atlanta city	254,062	130,222	416,474	83.5
2.	Albany city	49,643	25,193	76,939	66.9
3.	Columbus city				
	(balance)	80,698	90,200	185,781	65.3
4.	Valdosta city	21,091	20,440	43,724	61.5
5.	Savannah city	74,691	49,903	131,510	60.3
6.	Gainesville city	3,952	12,218	25,578	59.0
7.	LaGrange city	12,289	12,588	25,998	56.8
8.	Macon city	60,503	34,050	97,255	56.3
9.	Athens-Clarke County				
	(balance)	27,284	61,950	100,266	53.5
10.	Augusta-Richmond County				
	County (balan	97,517	85,340	195,182	52.5
11.	Marietta city	17,090	28,544	58,748	51.3
12.	Dalton city	2,042	13,867	27,912	50.1
13.	Rome city	9,638	20,704	34,980	48.9
14.	Roswell city	6,620	59,870	79,334	41.0
15.	Peachtree City city	1,894	26,873	31,580	38.5
16.	Warner Robins city	15,504	29,538	48,804	37.8
17.	East Point city	30,728	5,135	39,595	37.8
18.	Smyrna city	10,963	21,936	40,999	35.8
19.	Alpharetta city	2,224	28,143	34,854	28.4
20.	Hinesville city	13,792	11,796	30,392	16.6

Figure 5: Census Scope, https://censusscope.org/us/s13/p67284/chart_exposure.html

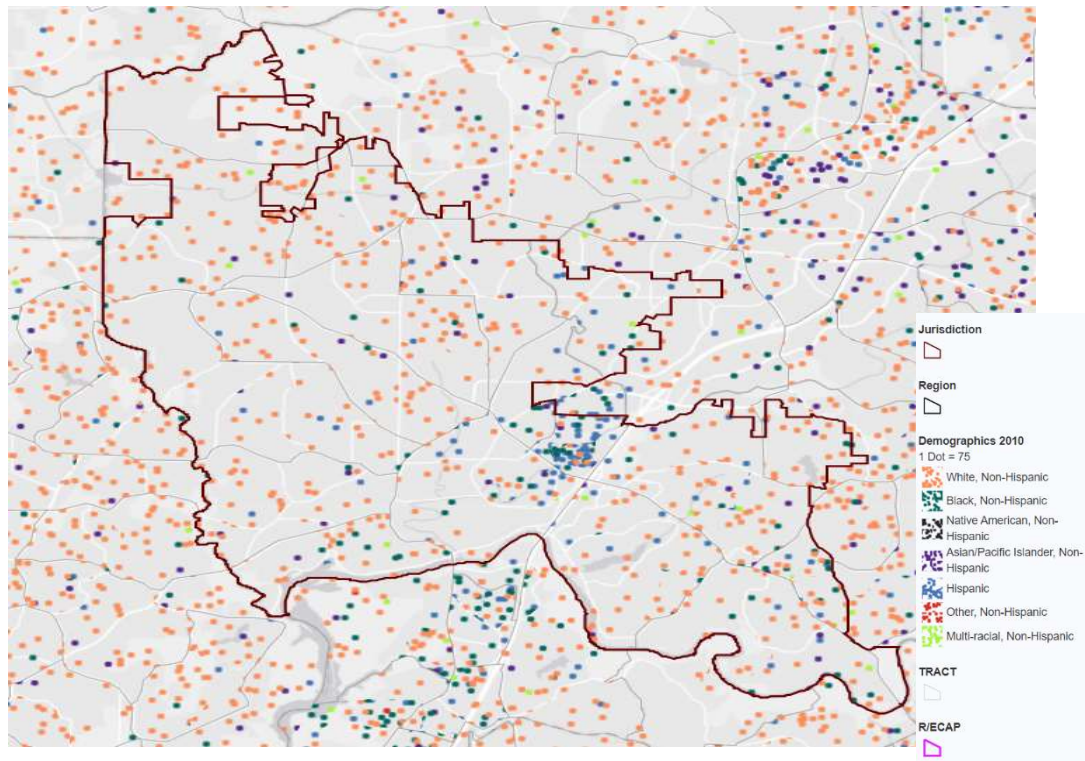
Racially and Ethnically Concentrated Areas of Poverty (RECAP)

Although ethnicity and race as described by the US Census are not the same, this study uses rates of both non-White and Hispanic populations to map a single combined group of racial and ethnic concentrations, henceforth referred to collectively as racially concentrated areas of poverty, or RCAPs.

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

¹ Department of Housing and Urban Development, 2020. Available at: https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_0

HUD Affirmatively Furthering Fair Housing Data & Mapping Tool



Name: Roswell (CDBG)
Map 1 - Race/Ethnicity
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Roswell (CDBG)
Region: Atlanta-Sandy Springs-Roswell, GA
Data Version: AFFHT0006

Figure 6 Source: HUD AFFH Mapping Tool: <https://egis.hud.gov/affht/>

In 2022 there were no existing RECAP areas within the City of Roswell, as reflected in the figure above.

III. ACCESS TO OPPORTUNITY

Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services and amenities, which are critical factors to consider when measuring fair housing choice. Social research has demonstrated negative effects of residential segregation on income and opportunity for minority families, who are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.”² Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.³

² Orfield, Myron. “Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation.” *Fordham Urban Law Journal*. Volume 33, Issue 3, 2005.

³ Turner, Margery, et al. “Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000.” Urban Institute. Online: huduser.org/Publications/pdf/Phase1_Report.pdf

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity” model based on research developed by The Kirwan Institute for the Study of Race and Ethnicity at Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region. The Institute argues that “we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in ‘free market’ opportunities.”

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity, “comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities,” according to the Institute.

A. Overview of HUD-Defined Opportunity Factors

Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services and amenities, which are critical factors to consider when measuring fair housing choice. Social research has demonstrated negative effects of residential segregation on income and opportunity for minority families, who are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.”⁴ Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.⁵

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity” model based on research developed by The Kirwan Institute for

⁴ Orfield, Myron. “Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation.” *Fordham Urban Law Journal*. Volume 33, Issue 3, 2005.

⁵ Turner, Margery, et al. “Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000. Urban Institute. Online: huduser.org/Publications/pdf/Phase1_Report.pdf

the Study of Race and Ethnicity at Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region. The Institute argues that “we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in ‘free market’ opportunities.”

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity, “comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities,” according to the Institute.

Overview of HUD-Defined Opportunity Factors

HUD developed opportunity indicators to identify communities with disparate access to opportunity and identify protected classes experiencing disparate impacts of unfair housing choice. The opportunity index includes scores for: poverty, education, employment, transportation and environmental health. The following sections provide definitions of each opportunity indicator as defined in HUD’s AFFH-T Data Documentation and describe local findings. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity⁶.

B. Low Poverty Index

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

⁶ Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation, <https://egis.hud.gov/affht/>

Black, Non-Hispanic experience the most poverty in the Atlanta-Sandy Springs-Roswell, GA region.

Low Poverty Index		
	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs-Roswell, GA Region
Total Population		
White, Non-Hispanic	79.55	59.85
Black, Non-Hispanic	61.86	37.89
Hispanic	40.96	39.43
Asian or Pacific Islander, Non-Hispanic	76.27	58.62
Native American, Non-Hispanic	66.09	48.35
Population below federal poverty line		
White, Non-Hispanic	74.85	49.05
Black, Non-Hispanic	38.13	28.04
Hispanic	20.91	30.85
Asian or Pacific Islander, Non-Hispanic	46.00	49.35
Native American, Non-Hispanic	26.00	38.77

Table 22: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

C. School Proficiency Index

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

The table shows School Proficiency Index scores across race and ethnicity. In this table, we see that the White Non-Hispanic and Native American Communities have the most access to quality schools even when in poverty, while the Hispanic and Asian or Pacific Islander, Non-Hispanic communities have the least access to quality schools in the City. For the Region, Black Non-Hispanic and Native American, Non-Hispanic communities have the least access to quality schools.

School Proficiency Index		
	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs- Roswell, GA Region
Total Population		
White, Non-Hispanic	83.38	69.77
Black, Non-Hispanic	73.63	40.02
Hispanic	64.23	54.38
Asian or Pacific Islander, Non-Hispanic	81.25	68.79
Native American, Non-Hispanic	75.42	57.20

Population below federal poverty line		
White, Non-Hispanic	83.17	61.59
Black, Non-Hispanic	65.40	36.05
Hispanic	57.19	48.57
Asian or Pacific Islander, Non-Hispanic	61.21	59.78
Native American, Non-Hispanic	71.62	47.66

Table 23: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

D. Labor Market Engagement Index

The Labor Market Engagement Index measures a community's level of employment, labor force participation, and educational attainment in a community, the higher the score, the higher the opportunity for engagement in the labor market. The table below depicts the Labor Market Engagement Index scores across race and ethnicity. In Roswell, White and Native American Non-Hispanic communities have the most labor market engagement even when in poverty while the Hispanic community has the least labor market engagement. Comparatively, in the Region, Black Non-Hispanic and Native Americans have the least labor market engagement.

Labor Market Index		
	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs- Roswell, GA Region
Total Population		
White, Non-Hispanic	90.36	61.92
Black, Non-Hispanic	82.56	42.07
Hispanic	70.21	52.79
Asian or Pacific Islander, Non-Hispanic	88.85	67.06
Native American, Non-Hispanic	85.27	52.19
Population below federal poverty line		
White, Non-Hispanic	89.52	50.74
Black, Non-Hispanic	73.59	34.68
Hispanic	57.60	47.54
Asian or Pacific Islander, Non-Hispanic	75.70	60.41
Native American, Non-Hispanic	83.00	44.07

Table 24: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

E. Transit Index

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

The table below reflects the Transit Index scores across race and ethnicity. Based on these indicators, transit use is consistent across most of the racial and ethnic below the federal poverty line with Hispanics at the highest rate. The White, Non-Hispanic community utilizes the least consistently across the City and the Region.

Transit Index		
	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs- Roswell, GA Region
Total Population		
White, Non-Hispanic	66.58	48.79
Black, Non-Hispanic	71.38	56.34
Hispanic	75.93	60.15
Asian or Pacific Islander, Non-Hispanic	68.10	61.48
Native American, Non-Hispanic	69.74	51.37
Population below federal poverty line		
White, Non-Hispanic	68.51	47.67
Black, Non-Hispanic	75.79	61.47
Hispanic	81.67	63.28
Asian or Pacific Islander, Non-Hispanic	77.51	66.10
Native American, Non-Hispanic	71.00	53.35

Table 25: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

F. Low Transportation Cost Index

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

Low Transportation Cost Index		
	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs- Roswell, GA Region
Total Population		
White, Non-Hispanic	51.20	44.83
Black, Non-Hispanic	61.00	52.30
Hispanic	68.20	56.16
Asian or Pacific Islander, Non-Hispanic	54.50	53.17
Native American, Non-Hispanic	57.42	48.65
Population below federal poverty line		
White, Non-Hispanic	54.34	47.66
Black, Non-Hispanic	70.58	57.21
Hispanic	76.21	59.98

Asian or Pacific Islander, Non-Hispanic	68.92	59.62
Native American, Non-Hispanic	66.00	52.24

Table 26: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

G. Jobs Proximity Index

The Jobs Proximity Index measures the distance of job locations from a community. Greater weight is given to larger employment centers. The competition for a job location measured by labor supply is inversely weighted. The location of employers significantly affects access to opportunity for Roswell residents.

The table below reflects the Jobs Proximity Index scores across race and ethnicity. In this table, we see that the Hispanic and Black-Non-Hispanic communities live closest to where they work in Roswell. However, in the Region, the Pacific Islander, Non-Hispanic community live closest to where they work.

Jobs Proximity Index		
	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs-Roswell, GA Region
Total Population		
White, Non-Hispanic	67.18	41.85
Black, Non-Hispanic	71.10	43.44
Hispanic	78.63	54.48
Asian or Pacific Islander, Non-Hispanic	70.29	57.55
Native American, Non-Hispanic	71.92	42.84
Population below federal poverty line		
White, Non-Hispanic	69.40	42.01
Black, Non-Hispanic	79.80	49.47
Hispanic	83.64	58.58
Asian or Pacific Islander, Non-Hispanic	76.96	63.00
Native American, Non-Hispanic	74.89	47.18

Table 27: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

H. Environmental Health Index

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

As reflected in the table below, the Environmental Health Index scores for Roswell is listed by race, ethnicity, and poverty. In this table, we see that the White and Native American communities have the least exposure to environmental toxins in Roswell and the Region. The Hispanic communities has greatest exposure for environmental toxins across the City and Region.

Environmental Health Index

	Roswell, GA CDBG Jurisdiction	Atlanta-Sandy Springs-Roswell, GA Region
Total Population		
White, Non-Hispanic	18.41	20.45
Black, Non-Hispanic	16.89	14.17
Hispanic	15.22	15.89
Asian or Pacific Islander, Non-Hispanic	18.01	16.32
Native American, Non-Hispanic	16.98	18.24
Population below federal poverty line		
White, Non-Hispanic	17.69	20.41
Black, Non-Hispanic	14.83	12.65
Hispanic	13.88	14.74
Asian or Pacific Islander, Non-Hispanic	15.87	13.90
Native American, Non-Hispanic	16.00	16.17

Table 28: HUD AFFH Mapping Tool, HUD AFFH, <https://egis.hud.gov/affht/>

IV. LOCAL OPPORTUNITY FACTORS

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

A. Unemployment

Household income is a determining factor of where people can afford to live and the quality of housing conditions they can afford to have. Quality jobs provide access to sufficient household income and improve housing choice. The tables below show employment status over time and by gender and race/ethnicity. Employment status is assessed for the population over 16 years and over. Persons in the age group of 16 to 64 years who are seeking employment or currently working are considered to be participating in the labor force. An individual who is not actively seeking a job is not considered to be participating in the labor force and thus is not part of the unemployment calculation. The City of Roswell's unemployment rate decreased from 3.3 percent in 2018 to 2.2 percent in 2021. However, labor force participation remained flat from 2018 to 2021. The employed population also remained relatively flat during that time.

Employment Status, City of Roswell, 2010 and 2018		
	2018	2021
Population 16 years and over	72,943	72,890
In labor force	51,932	52,656
Employed	50,158	50,770
Unemployed	1,714	1,916

There is a disparity in the unemployment rate for females to males. Females are twice as likely to face unemployment at a rate of 5.2% compared to males at a rate of 2.4%. There are also significant disparities between racial and ethnic groups. The Black or African American, Multi-

racial, and Asian communities' experiences significantly higher rates of unemployment than other racial and ethnic groups.

Unemployment Rate	
Male	2.4%
Female	5.2%
White	3.4%
Black or African American	6.7%
American Indian and Alaska Native	0.0%
Asian	4.8%
Native Hawaiian and Other Pacific Islander	0.0%
Some other race	1.7%
Two or more races	6.4%
Hispanic or Latino origin (of any race)	4.4%

B. Occupation by Industry

In addition to employment patterns, a closer look at where residents work helps to assess overall access to economic opportunity. Educational Services, Professional Scientific, and Management, and Administrative and Waste Management Services comprises 39 percent of the employed population over 16, the largest share of jobs in the City. This is followed by Finance and Insurance at 11.02 percent and Arts, entertainment, and recreation, and accommodation and food services at 10.44 percent.

Occupations by Industry, City of Roswell, 2022		
	Estimate	Percent
Agriculture, forestry, fishing and hunting, and mining	184	0.37%
Construction	3,488	7.09%
Manufacturing	3,008	6.12%
Wholesale trade	1,377	2.80%
Retail trade	4,587	9.33%
Transportation and warehousing, and utilities	1,834	3.73%
Information	1,972	4.01%
Finance and insurance, and real estate and rental and leasing 3	5,423	11.02%
Professional, scientific, and management, and administrative and waste management services	11,759	23.91%
Educational services, and health care and social assistance	7,429	15.10%
Arts, entertainment, and recreation, and accommodation and food services	5,135	10.44%
Other services, except public administration	2,306	4.69%
Public administration	688	1.40%

C. Minimum Wage

The current minimum wage in the City of Roswell is \$7.25 per hour. Based on MIT's Living Wage Calculator, City's minimum wage is \$11.12 below the \$18.37 living wage for one adult with no

children and \$19.72 below the living wage for two working adults with one child, within the Atlanta metropolitan region. A living wage is an hourly rate that an individual in a household must earn to support himself or herself and their family. According to MIT, the living wage shown is the hourly rate that an individual in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year).⁷

	1 ADULT				2 ADULTS (1 WORKING)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$18.37	\$33.14	\$41.14	\$53.59	\$26.97	\$31.96	\$37.43	\$40.58
Poverty Wage	\$6.19	\$8.38	\$10.56	\$12.74	\$8.38	\$10.56	\$12.74	\$14.92
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25	\$7.25

Considering these large gaps between minimum and living wages, households with adults earning minimum wage would need additional assistance in securing housing in the City of Roswell.

D. Educational Attainment

Educational attainment is a key factor in future wages and economic opportunities. Over 96.0 percent of Roswell's population has a high school education, 68.8 percent have a bachelor's degree, which is far better than the state at 20.9%.

Occupations by Industry, City of Roswell, 2022				
	City of Roswell		State of Georgia	
	Estimate	Percent	Estimate	Percent
Population 25 years and over	62,264	100.0%	7,2342,271	100.0%
Less than high school diploma	2,011	4.0%	797,877	11.0%
High school graduate (includes equivalency)	7,277	11.7%	389,938	26.7%
Some college or associate's degree	7,179	11.5%	389,304	19.2%
Bachelor's degree	26,317	42.3%	115,177	20.9%
Graduate or professional degree	16,512	26.5%	991,062	13.7%
High school graduate or higher	59,753	96.0%	6,436,394	89.0%
Male, high school graduate or higher	28,433	96.6%	978,920	28.4%
Female, high school graduate or higher	31,320	95.4%	951,456	25.1%
Bachelor's degree or higher	42,829	68.8%	1,514,014	20.9%
Male, bachelor's degree or higher	21,326	72.4%	714,774	20.8%
Female, bachelor's degree or higher	21,503	65.5%	799,240	21.1%

Table 29 Source: U.S. Census Bureau, 2021 American Community Survey, www.census.gov

⁷ Living Wage Calculation for City of Roswell, Georgia <https://livingwage.mit.edu/counties/13067>

E. Broadband Access

For many Americans, access to computers and high-speed Internet connections is an integral part of their everyday lives. As most of information, services, and resources have transitioned to online access, digital inequality has a direct impact on low-income household's social inequality. Access to high-speed internet is a growing need, and lack of high-speed internet disproportionately impacts low- and moderate-income households and neighborhoods. According to HUD's Office of Policy Development, in the *Digital Inequality and Low-Income Households* Report, the disparate access to broadband can correlate with the inequality of income, education, race, and ethnicity. As part of the 2008 Broadband Data Improvement Act, the U.S. Census Bureau began asking about computer and Internet use in the 2018 American Community Survey (ACS). Federal agencies use these statistics to measure and monitor the nationwide development of broadband networks and to allocate resources intended to increase access to broadband technologies, particularly among groups with traditionally low levels of access.

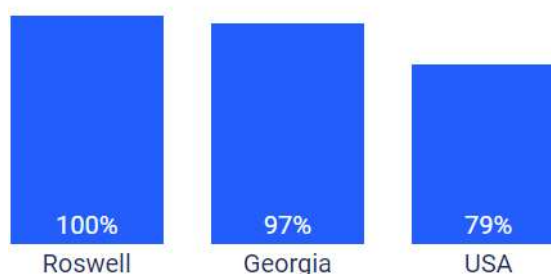
Computer and Internet Use in Roswell, GA

	2018		2019		2020	
	Estimate	%	Estimate	%	Estimate	%
Total	35,856	(x)	35,944	(x)	34,882	(x)
Has a Computer	38,029	98%	34,867	97%	34,018	98%
With Dial-up Internet Subscription	0	0%	72	0%	20	0%
With Broadband Internet Subscription	35,029	98%	34,795	97%	33,998	98%
No Computer	827	2%	1,077	3%	867	2%

Broadband Internet Availability

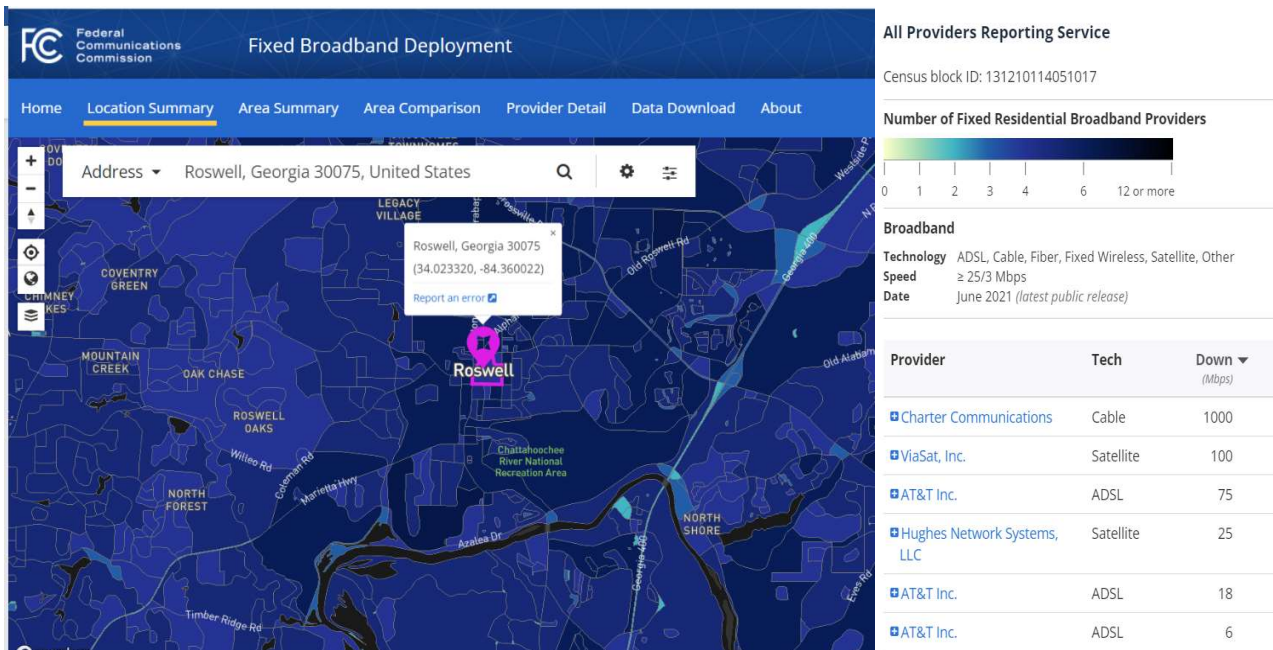
(Internet faster than 25 Mbps)

While historical ACS estimates reflect that more than 94 percent of the population has a broadband subscription, research data from High-Speed Internet indicates that the City has 100 percent broadband internet availability with 100 percent coverage for cable and 99 percent coverage for Digital subscriber line (DSL). The City's broadband access is more than 13 percent higher than the State and 21 percent higher than the total US. The City's broadband access is mainly served by four wired providers, AT&T, Xfinity, Charter, and Viasat.

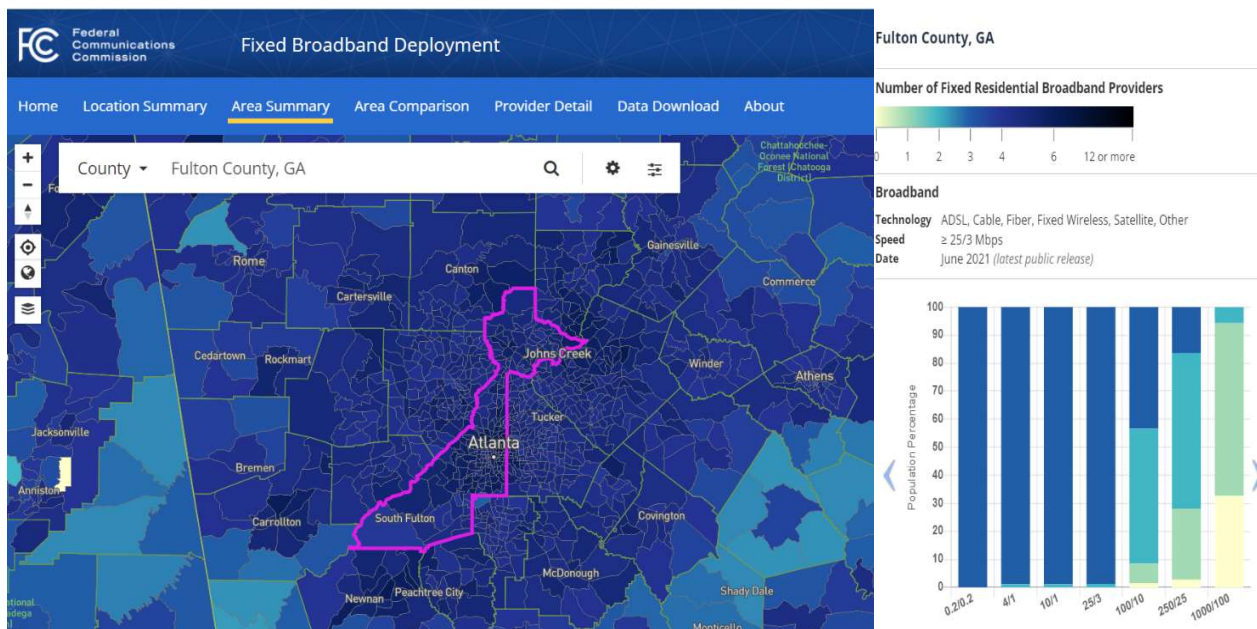


Source: High Speed Internet.Com; <https://www.highspeedinternet.com/ga/roswell>

The map below displays data showing the number of providers reporting residential fixed broadband service in the city. The map displays the population-weighted average number of broadband providers city level. This map shows all technologies and broadband at a speed of at least 25 Mbps downstream / 3 Mbps upstream.



Source: Federal Communications Commission, <https://broadbandmap.fcc.gov>



Source: Federal Communications Commission, <https://broadbandmap.fcc.gov>

The City of Roswell has broadband availability throughout the city and just over two percent of the population does not have broadband access. Some broadband service providers have qualifying low-cost broadband services. For example, AT&T offers low-cost wireline home Internet service to qualifying households who meet the following characteristics:

- With at least one resident who participates in the U.S. Supplemental Nutrition Assistance Program (SNAP) and
- With an address in AT&T's 21-state service area, in which they offer wireline home Internet service, and
- Without outstanding debt for AT&T fixed Internet service within the last six months or outstanding debt incurred under this program.

F. Environmental Justice and Health

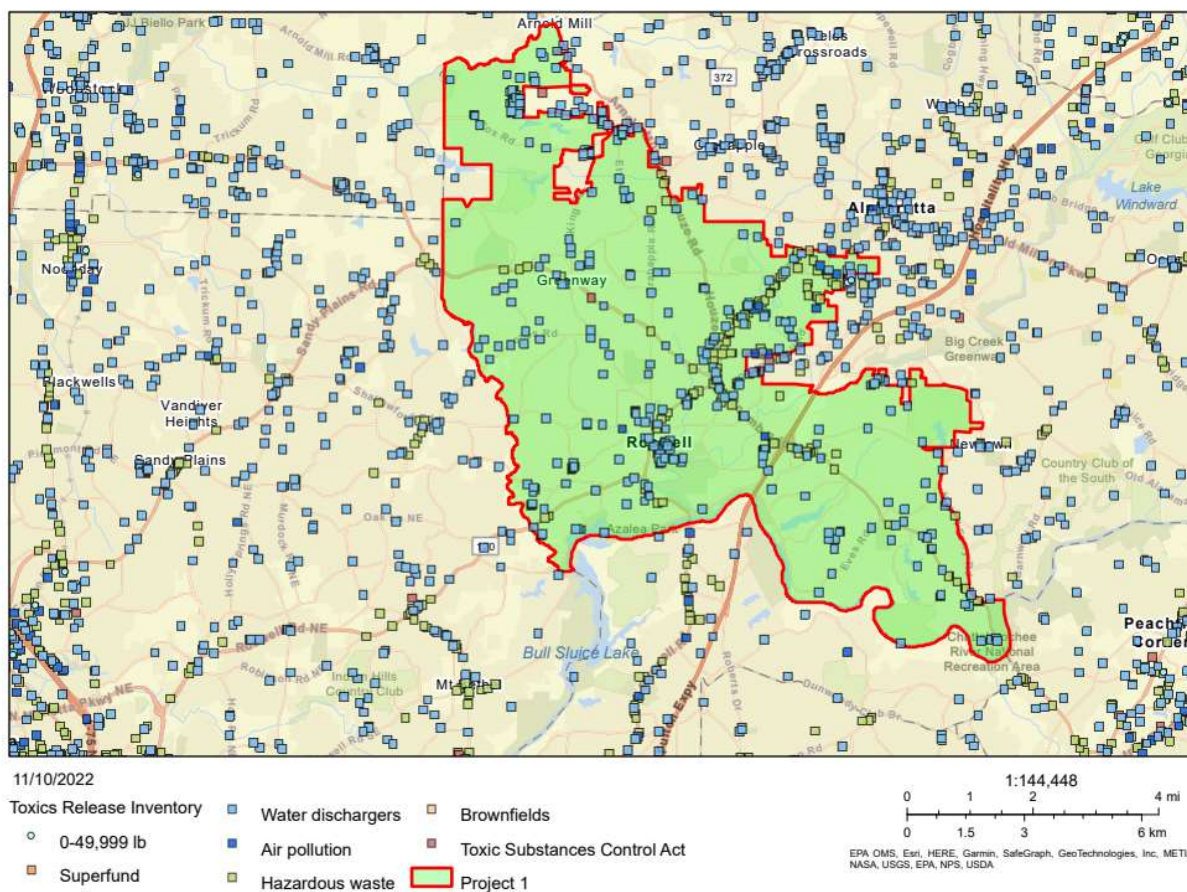
Historically environmentally hazardous sites have been disproportionately placed in communities of color, leading to exposure to hazardous materials and a higher risk of health problems. Siting of these dangerous environmental sites corresponds with housing segregation and zoning, placing high intensity uses near areas zoned multifamily or redlined communities. Environmental Justice and fair housing advocacy both seek to address racial segregation, disparities in access to political power, municipal fragmentation, boundary-drawing around resources, disinvestment, and administrative silos.⁸

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

The location of environmental health hazards is a significant contributing factor to disparities in access to opportunity. Roswell has a high concentration of sites reporting to EPA throughout the City. However, concentrations of air pollution and toxic release sites are particularly high in the central region of Roswell. These sites coincide with concentrations of communities of color, especially Black, Non-Hispanic populations, as well as concentrations of public housing in the City.

⁸ Haberle, Megan. 2017. Fair Housing and Environmental Justice: New Strategies and Challenges. *Journal of Affordable Housing*, Volume 26, Number 2.

Sites that Report to EPA in Roswell, GA



V. ANALYSIS OF PUBLIC POLICY IMPEDIMENTS

A. General Plan Land Use Element

Since 1968, the Fair Housing Act has prohibited explicit and implicit discriminatory practices through land use policies, building codes, public services, and other public and private practices, such as conditional or special use permits and real estate broker steering, that limit access to fair housing choice for members of protected classes⁹. Though examples and effects of such practices vary from jurisdiction to jurisdiction, in general, public and private policies should aim to further fair housing goals and proactively address potentially discriminatory practices and trends.

Zoning ordinances and land use regulations are designed to regulate the development and use of property, in some cases, the promotion or preservation of other factors, such as community character, site and location of services, housing typology, and the overall planning process, may deter fair housing choice by limiting housing choice and access to protected classes¹⁰. The

⁹ HUD, History of Fair Housing. Available at: https://www.hud.gov/program_offices/fair_housing_equal_opp/aboutftheo/history

¹⁰ Knapp, Gerrit et al. "Zoning as a Barrier to Multifamily Housing Development." American Planning Association. 2007. Available at: https://www.huduser.gov/Publications/pdf/zoning_MultifamilyDev.pdf

following sections examine critical public and private policy areas and their potential impact on fair housing choice in the City of Roswell.

Land use policies are fundamental to ensuring housing opportunities. Any land use policies that do not promote a variety of housing opportunities can impede housing choice. Roswell's Unified Development Code (UDC) is a single ("unified") tool that addresses contemporary development and zoning practices in a format that is consistent and easily understood by administrators, developers, and community members. The Code is the blueprint for the growth and development of the area.

The Code provides a wide range of land use designations that include residential uses as shown in the figure below. The building intensities and densities allowable within the range of land use designations provide for a wide range of housing opportunities throughout the county suitable to accommodate households of all incomes.

For many decades Roswell has grown through the conversion of vacant or undeveloped land to housing, commercial, and civic uses, but this is now changing. Open land available for new development has largely run out, and redevelopment has become an increasingly important way to accommodate future growth. The nature of this growth is also changing. In some areas, many buildings are nearing the end of their intended functional lives. Some older shopping centers, apartment complexes, and even whole neighborhoods are approaching a point where significant investment is required to maintain them in good condition. However, market forces may not justify such investment in their current uses, making redevelopment the only advantageous long-term option. Fortunately, many such sites are well located with regard to Downtown Roswell, Georgia 400, and other major transportation corridors, making them ideal redevelopment candidates.

VI. FAIR HOUSING TRENDS AND COMPLAINTS

This section includes a review of the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

A. Fair Housing Laws

The Fair Housing Act defines seven protected classes: race, color, religion, national origin, sex, disability, and familial status. Housing discrimination is unjust or prejudicial treatment of individuals, in the area of housing and real estate, based on the individual's protected class. Within the context of an increasingly diverse society, the potential for discrimination in housing choice remains an issue which must be vigilantly observed. In efforts to combat discrimination, federal and state laws have been enacted to provide a framework for ensuring fair housing choice.

B. Complaints Filed With HUD

The Office of Fair Housing and Equal Opportunity [FHEO] administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing

complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

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

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

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

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

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

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

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973 (disability)

- Title II of the American with Disabilities Act of 1990
- Architectural Barriers Act of 1968
- Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972

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

A lack of complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants may want to avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing their treatment with that of another home seeker. Other time, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Lastly, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through it with. As a result, community education and referral processes regarding fair housing issues are a crucial aspect of reducing fair housing discriminations.

From January 1, 2017 through December 31, 2021, the period for which data was available for this assessment, HUD recorded 18 complaints filed with FHEO for the City of Roswell. As previously mentioned, cases to FHEO can be filed based on one or several reasons. As the table below highlights, most of those cases (8) were filed on the basis of race (8 cases), followed by disability (5 cases). The height of the number of cases occurred between 2020 and 2022, which could have been escalated by the pandemic.

YEAR	DISABILITY	RACE	FAMILIAL STATUS	COLOR	RETALIATION	NATIONAL ORIGIN	SEX	RELIGION	YEAR TOTALS
2017	0	1	0	0	0	0	0	0	1
2018	0	0	0	0	0	1	0	0	1
2019	0	0	0	0	0	0	0	0	0
2020	1	2	1	0	0	0	0	0	4
2021	1	4	0	0	0	1	0	0	6
2022	3	1	1	0	0	0	1	0	6
Complaint Type Total	5	8	2	0	0	2	1	0	18

C. Complaint Trends

The National Fair Housing Alliance (NFHA) is the only national organization dedicated solely to ending discrimination in housing. NFHA is the voice of fair housing and works to eliminate housing discrimination and to ensure equal housing opportunity for all people through leadership, education and outreach, membership services, public policy initiatives, community development initiatives, advocacy, and enforcement. NFHA's 2021 Fair Housing Trends Report describe the role housing discrimination plays in many aspects of our society, including the current COVID-19 pandemic, and how neighborhoods and people of color are affected adversely by climate change, the prevalence of toxic waste and other pollutants, the economic crisis, bias in technology, and much more.

The data provides a snapshot of the number and types of housing discrimination complaints that have been reported. NFHA receives housing discrimination complaint data from state and local Fair Housing Assistance Program (FHAP) agencies, the U.S. Department of Housing and Urban Development (HUD), and the U.S. Department of Justice (DOJ).

According to the National Fair Housing Alliance 2021 Fair Housing Trends Report, the number of fair housing complaints, 28,712, in 2020 remained consistent with prior years, despite the fact that many households remained stationary, especially in the early months of the COVID-19 pandemic. The pandemic did not appear to mitigate discrimination. In fact, harassment of the Asian American and Pacific Islander community at or near their homes increased, as did sexual harassment against tenants who were unable to pay their rent due to job loss or underemployment¹¹.

According to the 2021 NFHA report, 1,071 complaints of harassment were reported in 2020, which was a significant increase from the 761 complaints reported in 2019 and the highest number of harassment complaints reported since NFHA began collecting detailed harassment data in 2012. In addition, NFHA reporting private fair housing organizations continued to process almost three times the number of complaints (73.45 percent) processed by state, local, and federal government agencies combined. As noted in the 2021 NFHA Report, complaints alleging discrimination because of disability continue to account for the largest number of complaints, at 54.56 percent. Race-based complaints constituted 16.79 percent of complaints, and familial status discrimination accounted for 7.93 percent of complaints.¹²

In addition to the traditional fair housing complaint data analysis, NFTA also addresses the fair housing implications of the COVID-19 pandemic. According to NFTA's, 2021 Fair Housing Trends Report, the COVID-19 pandemic resulted in various other fair housing concerns related to sexual harassment in housing situations, domestic violence, and discrimination based on national origin and

¹¹ NFHA, <chrome-extension://efaidnbmnnnibpcajpcqlclefindmkaj/https://nationalfairhousing.org/wp-content/uploads/2021/10/trends-2021-c.pdf>

¹² NFHA, <chrome-extension://efaidnbmnnnibpcajpcqlclefindmkaj/https://nationalfairhousing.org/wp-content/uploads/2021/10/trends-2021-c.pdf>

disability status¹³. According to the National Fair Housing Alliance 2021, Black, Latino, and Native American populations were hardest hit as the rates of hospitalizations and deaths due to COVID infection were highest in these communities. Asian Americans and Pacific Islanders experienced a nine percent increase in harassment and discrimination at or near their homes. Housing discrimination harassment complaints based on sex and disability also increased by 40 percent in 2020.

D. Hate Crimes

Hate crimes are violent acts against people, property, or organizations motivated by a bias against race, gender, gender identity, religion, disability, ethnicity, or sexual orientation. Hate crimes are often committed on the basis of differences in personal characteristics, such as appearance, language, nationality, or religion. The key element of any hate crime is the presence of bias motivation. The criminal act alone does not define a hate crime; rather, the investigation of the crime must conclude that the offender was bias motivated. Eight bias categories are used when reporting hate crimes: Anti-Racial, Anti- Ethnicity/National Origin, Anti-Religious, Anti-Disability, Anti-Sexual, Gender Bias, Gender Identity Bias and Non-Specific. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents. However, it was not until early in the last decade that the federal government began to collect data on how many and what kind of hate crimes are being committed, and by whom.

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

Reporting hate crimes is voluntary on the part of the local jurisdictions, and not all jurisdictions are represented in the reports. Hate crime statistics compiled for the City of Roswell reflected no hate crimes that met FBI data collection guidelines between 2016 and 2020¹⁴.

¹³ NFHA, <chrome-extension://efaidnbmnnnibpcajpcqlclefindmkaj/https://nationalfairhousing.org/wp-content/uploads/2021/10/trends-2021-c.pdf>

¹⁴ FBI Crime Data Explorer, <https://crime-data-explorer.fr.cloud.gov/pages/explorer/crime/hate-crime>

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

A. Affirmatively Furthering Fair Housing

The requirements for affirmatively furthering fair housing are long-standing components of HUD's housing and community development programs. Entitlement jurisdictions that receive funds from HUD, such as, the City of Roswell are required to execute certification to affirmatively furthering fair housing in its Five-year Consolidated Plan and Annual Action Plan. The HUD AFFH requirements that a jurisdiction:

- Conduct an Analysis of Impediments to Fair Housing Choice;
- Take actions to remedy impediments, if impediments are identified;
- Maintain records of the analysis and actions taken.

The Analysis of Impediments not only identifies impediments to fair housing choice, but also makes recommendations to overcome the effects of those impediments and will serve as the basis for fair housing planning, providing essential information to staff, policy makers, housing providers, lenders, and fair housing advocates, and assisting with garnering community support for fair housing efforts.

This Analysis of Impediments to Fair Housing Choice for the City of Roswell revealed three impediments to fair housing choice. The key issues identified below are accompanied by suggested actions the County should implement in order to remediate these impediments. These actions were designed to offer greater housing choice for protected classes, who often experience discrimination in the housing market.

For this analysis, HUD's Fair Housing Planning Guide defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices.¹⁵ Throughout this analysis, various community issues have surfaced, both positive and negative. Some of these issues represent general community needs (e.g. the quality of jobs available) and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments. Even some affordable housing-related issues (e.g. low credit scores leading to denial of apartment rental applications) fell short of classifying as impediments to fair housing choice.

Qualitative data received in the form of input from interviews and community meetings was combined with quantitative data from the fair housing survey and from the many other sources consulted, including the U.S. Census, the American Community Survey, and Home Mortgage Disclosure Act data. In some cases, the quantitative data collected from a sole source was clear and compelling enough on its own to indicate the existence of an impediment. In other cases, and particularly with the use of qualitative data, the cumulative effect of a comment or criticism repeated many times over in many different settings was sufficient to indicate an impediment. Sometimes a weak or inconclusive

¹⁵ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17). March 1996.

correlation of quantitative data from one source could be supported by public comments and input or data from another source to constitute an impediment.

In this section, the impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these impediments are largely systemic and will require corrective efforts from the private and public sectors.

B. Previous Impediments to Fair Housing Choice

IMPEDIMENT	DESCRIPTION	ACTIONS UNDERTAKEN
Fair Housing Education and Outreach	There is a continuing need to educate renters and homebuyers about their rights under the Fair Housing Act and to advise realtors, sellers, landlords, mortgage brokers, and the public in general about the Fair Housing Act and their obligations under the Act. Overall, there is a need to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.	<ul style="list-style-type: none"> The City hosted a fair housing workshop to educate tenants, landlords, sellers, and mortgage brokers.
Continuing Need for Affordable Housing	The median value and cost to purchase a single-family house in the City of Roswell that is decent, safe, and sound is \$297,000; this limits the choice of housing for a 4-person family in Roswell, where the median household income is less than \$82,150. About a quarter (24.7%) of the existing homeowners in Roswell are spending more than 30% of their total income on housing cost, which makes them cost burdened. Almost half (49.8%) of the existing renter households in Roswell are spending more than 30% of the total income on housing, which makes them cost burdened.	<ul style="list-style-type: none"> The City supported plans from both private developers and non-profit housing agencies to develop, construct, and/or rehabilitate affordable housing in the City. The City also rejoined the Georgia Urban County Consortia to receive HOME Investment Partnerships funds.
Economic Opportunities to Improve Housing Choice	There is a lack of economic opportunities in the City, which prevents lower-income households from increasing their income and thus their housing choice. The cost of housing in the City limits housing	The city supported the North Fulton Community Charities with their job training program.

	choice for government and public service employees.	
Continue to Review, Monitor, and Update Public Policies	Public policies such as building codes and zoning ordinances need to be annually reviewed. Furthermore, these policies affect the construction and rehabilitation of housing in the community and determine occupancy requirements, locations, and density of housing.	The City continues to champion the benefits of its new Unified Development Code (UDC)--a single ("unified") tool that addresses contemporary development and zoning practices in a format that is consistent and easily understood by administrators, developers, and community members.

VIII. IMPEDIMENTS TO FAIR HOUSING CHOICE & RECOMMENDATIONS

A. Impediment 1: Lack of Affordable Housing

There is a lack of affordable housing in the City of Roswell due to the City’s population growth and influx of higher priced housing construction. Construction costs are exacerbated by the City’s lack of available land to develop lower costs housing. This has created a high demand on a limited affordable housing supply, and a corresponding increase in the cost of rental and sales housing.

Goal: Increase the supply of affordable housing by developing or redeveloping areas to support various types of housing which is affordable to lower income households.

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

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

B. Impediment 2: Barriers Limiting Housing Choice

There are physical, economic, and social barriers (including older inaccessible housing for aging population, lack of diversity in housing, condition of housing in existing apartment complexes) in the City of Roswell which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the City's population. For example, Roswell is perceived as a place for families while only 35 percent of families having children that reside in the home.

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

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

- Support the redevelopment of strip shopping centers and areas along commercial corridors with incentives for diversity in housing type, density, and affordability.
- Evaluate housing options to serve the needs of Roswell residents, including the aging population and the young (millennials) professionals.
- Support and promote the development of affordable housing in areas of opportunity where minority and low-income persons and families may reside.
- Promote and support the development of affordable housing for minorities and low-income households who are being "forced out" of their homes and may not have housing resources to relocate.
- Support and promote sound planning principals and make revisions to land development and zoning ordinances to eliminate "exclusionary zoning," which restricts the development of affordable housing.

C. Impediment 3: Lack of Fair Housing Awareness

There is a continuing need to educate and promote the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA), awareness of discriminatory practices, and combat "NIMBYism." Despite 53.65% of residents knowing their Fair Housing Right, a total of 67.37% did not know how or where to report fair housing issues. Survey respondents of believed that a lack of education about fair housing contributed to unreported problems.

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

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

- Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending is not taking place.

- Publish and distribute housing information and applications in both English and Spanish to address the increase in Limited English Proficiency residents in the City of Roswell.
- Educate residents and local officials to eliminate neighborhood misconceptions and combat “NIMBYism.”

IX. CONCLUSION

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

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

X. APPENDICES

A. Notices and Publications for Community Participation

B. Summary of Public Comments

C. A.I. Survey & Results

D. HUD Fair Housing Complaint Data