

**Performance Audit:  
Affordable Housing**

**July 2018**

**City Auditor's Office  
City of Atlanta**





## CITY OF ATLANTA

City Auditor's Office  
Amanda Noble, City Auditor  
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July 2018

# Performance Audit:

## Affordable Housing

### What We Found

Over half of homes in the City of Atlanta are affordable to households that the U.S. Department of Housing and Urban Development defines as "very low-income," earning less than \$33,750 annually for a household of four. Affordable housing in the city is concentrated in areas that are defined as low-income. Eight of twelve council districts have household income levels less than 80% of the area median income for a household of four. While the city's housing costs are relatively low compared to other metro areas, they are rising.

Nearly half of the over 99,000 households who rent in the city pay more than 30% of income on rent, meaning they are cost-burdened. Rising housing prices will likely result in an increase in cost-burdened renters without an increase in housing supply. Housing subsidies the city has provided developers have created a limited supply of housing with half located in areas that are already affordable, lack access to transit, and contain below-average schools. Future efforts should target areas with positive quality of life factors such as access to public transportation and education as well as proximity to job centers. Monitoring efforts for 25 sampled rental units ensured affordability compliance.

The city's affordable housing goals are incorporated into multiple plans and lack quantifiable or measurable outcomes. Quantifiable goals would help create a cohesive affordable housing strategy and measure achievement of outcomes of multiple programs.

City Council recently passed legislation to reestablish the Housing Commission to explore options to finance affordable housing. The commission could help coordinate citywide affordable housing policies. City Council has also passed legislation to increase affordable housing through inclusionary zoning and to support anti-displacement efforts. The city could expand efforts to create affordable housing such as by increasing the use of community land trusts. The city should consider increasing affordability periods for rental units and maintaining the affordability of purchased units.

### Why We Did This Audit

We undertook this audit to assess affordable housing initiatives in the city, specifically those of Invest Atlanta and the Department of City Planning's Office of Housing and Community Development. We analyzed market conditions pertaining to affordable housing supply and demand, assessed housing and zoning best practices and initiatives in other municipalities, and reviewed administration and monitoring efforts for affordable housing stock.

### What We Recommended

To facilitate the city's efforts to create and maintain affordable housing, the Commissioner of the Department of City Planning should:

- Address the unbalanced distribution of affordable housing between the northern and southern parts of the city
- Target areas with positive quality of life factors such as public transportation, access to education, and proximity to job centers when subsidizing affordable housing developments
- Consolidate key information related to available housing programs and make that information more readily available to citizens and developers
- Consider longer affordability periods when subsidizing for-purchase housing
- Develop a mechanism to maintain affordability when subsidizing for-purchase housing
- Expand the use of programs such as providing density bonuses to developers and increasing the use of community land trusts

For more information regarding this report, please use the "contact" link on our website at [www.atlaudit.org](http://www.atlaudit.org)

## Management Responses to Audit Recommendations

Summary of Management Responses		
<b>Recommendation #1:</b>	We recommend that the Commissioner of the Department of City Planning should work with city leaders and stakeholders to address the unbalanced distribution of affordable housing between the northern and southern parts of the city.	
<b>Response &amp; Proposed Action:</b>	The Department will complete the Atlanta Equitable Housing Needs Assessment report by August 2018; implementation of equitable affordable housing strategy will be ongoing, with annual reports issued annually.	<b>Agree</b>
<b>Timeframe:</b>	August 2018; ongoing	
<b>Recommendation #2:</b>	We recommend that the Commissioner of the Department of City Planning should work with city leaders and stakeholders to target areas with positive quality of life factors such as public transportation, access to education, and proximity to job centers when subsidizing affordable housing developments.	
<b>Response &amp; Proposed Action:</b>	The Department will continue to provide preference points to projects that are in proximity to positive quality of life conditions.	<b>Agree</b>
<b>Timeframe:</b>	End of 2018	
<b>Recommendation #3:</b>	We recommend that the Commissioner of the Department of City Planning should work with city leaders and stakeholders to consolidate key information related to available housing programs and make that information more readily available to citizens and developers.	
<b>Response &amp; Proposed Action:</b>	The Department will develop a resource guide for residents, collaborate with other city agencies to link websites on affordable housing projects and resources, and reinstitute Developer Day in the city.	<b>Agree</b>
<b>Timeframe:</b>	End of fiscal year 2019	
<b>Recommendation #4:</b>	We recommend that the Commissioner of the Department of City Planning should work with city leaders and stakeholders to consider longer affordability periods when subsidizing rental housing.	
<b>Response &amp; Proposed Action:</b>	The Department will establish a working group of internal and external stakeholders by the end of CY18 to explore creating longer affordability periods on subsidized rental housing and provide recommendations to City Council by the end of CY19.	<b>Agree</b>
<b>Timeframe:</b>	End of calendar year 2019	
<b>Recommendation #5:</b>	We recommend that the Commissioner of the Department of City Planning should work with city leaders and stakeholders to develop a mechanism to maintain affordability when subsidizing for-purchase housing.	
<b>Response &amp; Proposed Action:</b>	The Department will establish a working group of stakeholders by the end of CY18 to explore the feasibility of creating mechanisms to maintain affordability when subsidizing for-purchase housing and provide recommendations to City Council by the end of CY19.	<b>Agree</b>
<b>Timeframe:</b>	End of calendar year 2019	

<b>Recommendation #6:</b>	We recommend that the Commissioner of the Department of City Planning should work with city leaders and stakeholders to expand the use of programs such as providing density bonuses to developers and increasing the use of community land trusts.	
<b>Response &amp; Proposed Action:</b>	The Department will begin working with internal and external stakeholders to explore the feasibility of adopting a Homeownership Inclusionary Zoning policy and present recommendations to City Council within 3 years.	<b>Partially Agree</b>
<b>Timeframe:</b>	End of fiscal year 2018	





## CITY OF ATLANTA

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**AUDIT COMMITTEE**  
Marion Cameron, CPA, Chair  
Daniel Ebersole

July 2, 2018

Honorable Mayor and Members of the City Council:

We undertook this audit to assess affordable housing initiatives in the city, specifically those of Invest Atlanta and the Department of City Planning's Office of Housing and Community Development. We analyzed market conditions pertaining to affordable housing supply and demand, assessed housing and zoning best practices and initiatives in other municipalities, and reviewed administration and monitoring efforts for affordable housing stock.

The Audit Committee has reviewed this report and is releasing it in accordance with Article 2, Chapter 6 of the City Charter. We appreciate the courtesy and cooperation of city staff throughout the audit. The team for this project was Amber Hart, Rebecca Robinson, Joshua Winfield, and Brad Garvey.

Amanda Noble  
City Auditor

Marion Cameron  
Chair, Audit Committee





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# Affordable Housing

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## Table of Contents

Introduction.....	1
Background.....	1
Affordability is Based on Income and Percent Spent on Housing .....	1
Multiple Entities Administer Housing Programs.....	2
Audit Objectives.....	5
Scope and Methodology .....	5
Findings and Analysis.....	7
Over Half of Atlanta’s Housing is Affordable, But Many Renters Are Cost-Burdened .....	7
55% of Atlanta’s Housing is Affordable to Very Low-Income Households.....	7
Affordable Housing is Unevenly Dispersed Throughout the City .....	10
Renters in All Council Districts Are Cost-Burdened .....	14
Affordable Housing Created Through Subsidies to Developers Unlikely to Meet Demand ..	16
Strategies Are Needed to Create Additional Affordable Housing and Minimize Negative Impacts of Development .....	25
A Cohesive Planning Approach Could Improve Results .....	26
Proposed Zoning Changes Should Result in Additional Affordable Housing .....	28
Atlanta is Implementing Methods Used in Other Cities to Create and Preserve Affordable Housing.....	30
Recommendations .....	35
Appendices.....	37
Appendix A: Management Review and Response to Audit Recommendations .....	39
Appendix B: District Demographic Profiles and Quality of Life Measures .....	45

## List of Exhibits

Exhibit 1: FY 2016 Area Median Income for Household of Four is \$67,500 .....	1
Exhibit 2: Goals Overlap in the City’s Key Affordable Housing Plans.....	4
Exhibit 3: 55% of Atlanta’s Housing is Affordable at 50% of AMI .....	8
Exhibit 4: Higher Income Districts Have Lower Percentages of Affordable Housing .....	10
Exhibit 5: Higher Percentages of Affordable Housing at 50% of AMI in South Atlanta .....	12
Exhibit 6: Higher Percentages of Affordable Housing at 80% of AMI in South Atlanta .....	13
Exhibit 7: Housing Affordability Varies Among Tax Allocation Districts.....	14

Exhibit 8: All Council Districts Contain Cost-Burdened Rental Households .....	15
Exhibit 9: High Percentage of Renters in South Atlanta Are Cost-Burdened .....	16
Exhibit 10: Subsidized Rentals Are Adequately Monitored in Sample of 25 .....	18
Exhibit 11: About Half of Subsidized Housing Is Located within Low-Income Areas .....	21
Exhibit 12: Residents in Higher Income Districts Have Shorter Work Commutes .....	22
Exhibit 13: Citywide Demographic and Quality of Life Profile .....	24
Exhibit 14: Smaller Lots Are More Affordable.....	29
Exhibit 15: Floor Area Ratio Doesn't Affect Affordability .....	29
Exhibit 16: The City Has No Mechanism to Maintain Affordability of Subsidized For- Purchase Homes .....	33

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## Introduction

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We undertook this audit to determine the amount of affordable housing stock in the city, to assess the effectiveness of the city's prior efforts to encourage the development of affordable housing, and to provide baseline data from which to assess and monitor the success of new initiatives.

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## Background

Atlanta experienced a high number of foreclosures between 2006 and 2009, which increased vacancy rates and decreased housing costs. The housing market began to recover in 2011 and since then, values have steadily increased. According to a 2016 HUD (U.S. Housing and Urban Development) report, the demand for homes in the metro area increased faster than the available supply, lowering the vacancy rates and increasing home prices and rents. In 2016, The Atlanta metro area was the ninth-largest metropolitan statistical area in the country, with a population of 5.8 million residents; the City of Atlanta proper included an estimated 473,000 residents. The metro Atlanta area is projected to grow by 2.5 million residents in the next 25 years. If the housing supply is unable to meet demand, housing costs will likely continue to increase.

### Affordability is Based on Income and Percent Spent on Housing

City code defines affordable housing as housing units accessible to individuals and families at or below 50% of the area median income. Section 54-1 of the city code defines affordable housing and provides that the city shall use area median income (AMI) data reported by HUD to determine housing affordability. Based on 2016 HUD data, the area median income for Atlanta was \$67,500 for a household of four—\$33,750 is 50% of AMI (see Exhibit 1).

### Exhibit 1: FY 2016 Area Median Income for Household of Four is \$67,500

FY16 Area Median Income (AMI)	% AMI	Number of Persons in Household							
		1	2	3	4	5	6	7	8
<b>\$67,500</b>	30%	\$14,200	\$16,200	\$20,160	<b>\$24,300</b>	\$28,440	\$32,580	\$36,730	\$40,890
	50%	\$23,650	\$27,000	\$30,400	<b>\$33,750</b>	\$36,450	\$39,150	\$41,850	\$44,550
	80%	\$37,800	\$43,200	\$48,600	<b>\$54,000</b>	\$58,350	\$62,650	\$67,000	\$71,300

**Source:** U.S. Department of Housing and Urban Development, FY 2016

To be deemed affordable, housing expenses should be no more than 30% of household income. In addition to the income basis of defining affordability, the percentage of household income spent on housing is used to determine whether housing is affordable. A widely accepted general rule of thumb is that housing expenses should not exceed 30% of household income. The rule was derived from the U.S. Housing Act of 1937, as amended, which provides federal subsidies to public housing agencies to provide low-income families with housing and promote mixed income housing. The Act provides that families whose monthly rental payments, including utilities, constitute more than 30% of the monthly household income were considered cost-burdened. HUD uses the 30% standard to determine rental affordability and maintains that renters who pay more than this amount on housing may have difficulty affording necessities such as food, clothing, transportation, and medical care. The standard has not been limited to renters—it is commonly used to determine housing affordability in general.

### **Multiple Entities Administer Housing Programs**

Initiatives to encourage affordable housing include subsidies to developers to build affordable housing and financial assistance to low to moderate-income individuals to purchase, rent, or rehabilitate housing. They also include assistance for specific populations, such as individuals with special needs, individuals who have HIV/AIDS, and persons and families who are homeless. Many federal, city, and non-profit agencies have a role in administering affordable housing programs in the city; however, the two primary agencies included in our audit scope are the Department of City Planning's Office of Housing and Community Development and Invest Atlanta. Our audit scope did not include programs administered by the Atlanta Housing Authority and Atlanta Land Bank Authority.

The Department of City Planning's Office of Housing and Community Development promotes the development of affordable workforce housing and community development policies. The Office of Housing is located within the city's Department of City Planning. It provides fiscal oversight and management of development contracts and programs. The office encourages public/private partnerships with developers to create workforce affordable housing and provides rental assistance and financing for affordable rental developments. In addition, Section 2-243(5) and Section 54-2 of the city code require the office to prepare impact statements for relevant proposed legislation to estimate the impact it may have on the affordable housing stock of the city.

Invest Atlanta provides initiatives to make intown living affordable for both homeowners and renters. It is a public corporation responsible for

managing several economic development programs on behalf of the city including bond financing, loan programs to stimulate job creation, tax allocation district financing, new market tax credits, and affordable workforce housing. Its programs are designed to provide funding to homebuyers through down payment assistance and incentives to developers to build affordable housing units in the City of Atlanta. Invest Atlanta oversees housing opportunity bonds, tax exempt bonds, and down payment assistance. Invest Atlanta also created Atlanta BeltLine, Inc., a nonprofit corporation, in 2006 to manage the BeltLine tax allocation district. Atlanta BeltLine, Inc. is responsible for implementing the projects in the redevelopment plan, acquiring property, and carrying out other redevelopment activities delegated by Invest Atlanta.

Atlanta's housing goals are outlined in three key documents: the city's Comprehensive Development Plan, the City's Consolidated Plan, and Invest Atlanta's Housing Strategy. Common goals among the documents include increasing affordable housing stock and addressing quality of life indicators through neighborhood revitalization (see Exhibit 2).

**Comprehensive Development Plan:** The City of Atlanta Comprehensive Development Plan is mandated by the Georgia Planning Act of 1989, and incorporated into Section 3-601 of the city code, which requires local governments to develop and adopt a comprehensive plan. The plan is a guide to the growth and development of the city, identifying the vision, policies and implementation plan for the next 15 years. The plan addresses areas including population, economic development, housing, natural resources, historic resources, community facilities, transportation, urban design, and land use. The 2016 plan seeks to address the challenges of housing affordability, cost-burdened households, and vacant and abandoned properties. The plan is created by the Department of City Planning, Office of Zoning and Development.

**Consolidated Plan:** The city receives entitlement grants each year from HUD. To receive the grants, the city must prepare a five-year plan that describes initiatives that align with HUD's three focus areas for the grants—affordable housing for low-income persons, homeless assistance and homelessness prevention, and housing and related services for individuals living with HIV/AIDS—with the overarching principle to provide benefits to low and moderate-income individuals and households. The 2015-2019 City of Atlanta Consolidated Plan identifies housing and community development priorities that align with the city's entitlement grants. The Consolidated Plan is prepared by the city's Office of Grants Services in the Department of Finance. The plan is a part of the city's Comprehensive Development Plan.

**Housing Strategy:** Invest Atlanta’s 2015 Housing Strategy focuses on attracting and retaining city residents without displacing long-term residents. According to the Housing Strategy, creating and maintaining affordable housing is key to building strong neighborhoods, creating jobs, and improving educational opportunities. The report also emphasizes the elimination of concentrated poverty, which has a negative effect on communities, schools, and quality of life. It states that funding sources are dwindling, and that “scattered shot approaches do not make a lasting impact.”

**Exhibit 2: Goals Overlap in the City’s Key Affordable Housing Plans**

City of Atlanta 2016 Comprehensive Development Plan	City of Atlanta 2015-2019 Consolidated Plan	Invest Atlanta - A Housing Strategy for the City of Atlanta, 2015
<ul style="list-style-type: none"> <li>• Increase the availability of affordable workforce housing</li> <li>• Create an affordable and walkable city</li> <li>• Retain, grow and attract middle-income residents by promoting the development of middle-income housing within mixed-income neighborhoods</li> <li>• Promote housing affordability to minimize the number of households that pay more than 30% of their income in rental payments</li> <li>• Emphasis on areas of opportunity</li> <li>• Transit oriented development</li> <li>• Encourage range of housing (missing middle)</li> </ul>	<ul style="list-style-type: none"> <li>• Conserve and expand the supply of affordable housing</li> <li>• Increase access to affordable housing for low/moderate-income persons and households</li> <li>• Assist homeless persons to move towards stable, economically sustainable, long-term housing as rapidly as possible</li> <li>• Assist low/moderate income persons to avoid homelessness and remain housed</li> <li>• Support the revitalization of low/moderate-income neighborhoods</li> <li>• Support economic development efforts that benefit low/moderate income persons and neighborhoods</li> </ul>	<ul style="list-style-type: none"> <li>• Attract new residents to the City of Atlanta and retain current ones</li> <li>• Reduce the number of Atlanta residents who spend a disproportionately high percentage of their income on housing</li> <li>• Rehabilitate and remove vacant, blighted units</li> <li>• Create a broad mix of housing choices throughout the city to serve a diverse population and workforce</li> <li>• Create new financial resources, and improve existing ones, to help the city achieve its housing goals</li> <li>• Make Atlanta one of the nation’s most environmentally sustainable cities</li> </ul>

**Source:** City of Atlanta 2016 Comprehensive Development Plan; HUD 2015-2019 Consolidated Plan; Invest Atlanta – A Housing Strategy for the City of Atlanta, 2015

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## Audit Objectives

This report addresses the following objectives:

- Is the City of Atlanta's housing affordable?
  - How are the city's recent initiatives likely to affect the amount of affordable housing stock?
  - Are city subsidized developments distributed equitably throughout the city?
  - Is the city monitoring developers' compliance with affordable housing agreement terms?
- 

## Scope and Methodology

We conducted this audit in accordance with generally accepted government auditing standards.

Our audit methods included:

- analyzing housing data from the 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and 2015 income data from the American Community Survey (ACS)
- reviewing city code provisions for affordable housing and zoning
- interviewing community stakeholders and staff from the Department of City Planning's Office of Housing and Community Development, Invest Atlanta, and City Council
- using Esri business analyst to review quality of life data within City Council districts and around sampled housing developments
- reviewing documentation to assess city monitoring of completed subsidized developments
- reviewing a random sample of 25 subsidized rental units within the Office of Housing and Invest Atlanta's portfolio to assess developers' compliance with recordkeeping and monitoring requirements
- reviewing proposed city efforts to promote affordable housing and zoning code reform
- reviewing a random sample of 33 homes purchased in the Eastside tax allocation district with assistance from Invest Atlanta to determine whether the homes are still owned by the original buyers

Generally accepted government auditing standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



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## Findings and Analysis

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### Over Half of Atlanta's Housing is Affordable, But Many Renters Are Cost-Burdened

Over half of the existing homes in the City of Atlanta are affordable to households that HUD (U.S. Department of Housing and Urban Development) defines as "very low-income," earning less than \$33,750 annually for a household of four. The city's housing costs are relatively low compared to other metro areas; however, home prices are rising.

Affordable housing is more concentrated in areas of the city defined as low income. Eight districts have median household incomes that are less than \$54,000, which is 80% of the area median income for a household of four. These eight districts have median incomes which would be defined as "low-income" by HUD. Only four districts have incomes that are higher than 80% of the area median income and would not be defined as low income by HUD.

Almost half of the more than 99,000 households who rent in the city are cost-burdened, paying more than 30% of household income on rent. An estimated 26% of renting households are paying 50% or more of household income on rent. Because increased home values also drive up rental costs, the percentage of cost-burdened renters will likely increase as home prices continue to move upward unless the supply of homes is increased enough to meet or exceed demand.

Housing subsidies that the city has provided to developers have created a limited amount of housing, and that about half of the housing is located in areas that are already affordable. Some subsidized rental developments are in areas that lack access to transportation and contain schools that are ranked as below average. Future efforts for subsidized affordable housing should target areas with positive quality of life factors such as public transportation, access to education, and proximity to job centers.

Of 25 rental housing units we sampled in 9 developments, we found that all were properly monitored by Invest Atlanta to ensure compliance with land use restriction agreements.

### 55% of Atlanta's Housing is Affordable to Very Low-Income Households

Over half (55%) of the existing homes in the City of Atlanta are affordable to households earning no more than 50% of the area median

income, which HUD defines as very low-income (see Exhibit 3). For a household of four, that equates to earning less than \$33,750 annually. As household income increases, so does the percentage of housing that is affordable. For example, citywide, 61% of homes in the city are affordable to households earning 60% of the area median income and 71% of homes are affordable to households who earn 80% of the area median income.

**Exhibit 3: 55% of Atlanta's Housing is Affordable at 50% of AMI**

Council District	Residential Parcels with Buildings	% Affordable at Given Percentage of Area Median Income			
		80% AMI	60% AMI	50% AMI	30% AMI
1	10,061	91%	78%	69%	52%
2	14,250	67%	48%	32%	12%
3	8,406	94%	87%	81%	68%
4	8,048	99%	97%	94%	89%
5	3,583	89%	72%	60%	32%
6	9,509	29%	17%	11%	2%
7	14,805	45%	31%	25%	9%
8	13,831	29%	23%	18%	9%
9	11,006	86%	74%	69%	54%
10	9,942	100%	99%	99%	96%
11	9,211	97%	93%	88%	77%
12	9,608	100%	100%	100%	98%
Citywide	135,043	71%	61%	55%	42%

**Notes:**

- Area median income is based on income of a household of four; if 0 or 1 bedroom, we used income for household of 2
- Appraised value of parcels with residential 1-4 family, condo, townhouse, or mobile home
- Assumes ability to obtain a 30 year-fixed rate mortgage with 4.27% APR and 20% down payment

**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest; income data from HUD, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016

The city's housing costs are relatively low compared to other metropolitan areas; however, home prices are rising. Atlanta ranked as the sixth most affordable among the 25 largest metropolitan areas in the country at the end of 2014. Although during this time the median sales price for an existing single-family unit was \$159,500, that figure rose to \$184,500 during 2016, representing a 16% increase.

Citywide, 55% of housing is affordable to households who earn 50% of the area median income. Affordability increases to 71% for households earning 80% of area median income. Affordability varies for different

income levels and council districts. As shown in Exhibit 3, households with lower incomes are less likely to be able to afford housing in the city. Districts 4, 10, and 12 have the highest percentages of homes affordable at 50% of area median income; districts 6, 7 and 8 have the lowest. Districts 2 and 5 have sharper drop-offs in affordability between 60% and 50% of AMI than others.

The area median income in Atlanta in 2016 was \$67,500 for a household of four; 50% of this amount is \$33,750 and 80% is \$54,000. The area median income is the midpoint of a region's income distribution-half of households in the region earn more than the median and half earn less. HUD defines 50% of area median income as "very low income" and 80% of area median income as "low income."

In our analyses, an affordable parcel is defined as one having a total appraised value, according to the county tax assessor, such that the monthly payment would be less than 25% of the monthly income of a household at a given percentage of the area median income. This assumes a 30-year fixed-rate mortgage at 4.27% annual percentage rate and a down payment of 20%. This methodology is consistent with the Housing Affordability Index produced by the National Association of Realtors. We excluded parcels with an appraised building value of zero and five and more unit multi-family structures. Within this framework, the appraised value of a home affordable to a household earning 50% of area median income is \$180,000. Some parcels in this dataset may include rented properties that are not classified as such in the tax digest. To the extent that assessed values lag market values, our analysis will overstate affordability. We did not assess the condition of properties. The Department of City Planning's 2013 Strategic Community Investment Conditions Report identified 6.4% of residential structures in the city as vacant and 3.1% of residential structures in the city as being in poor or deteriorated condition.

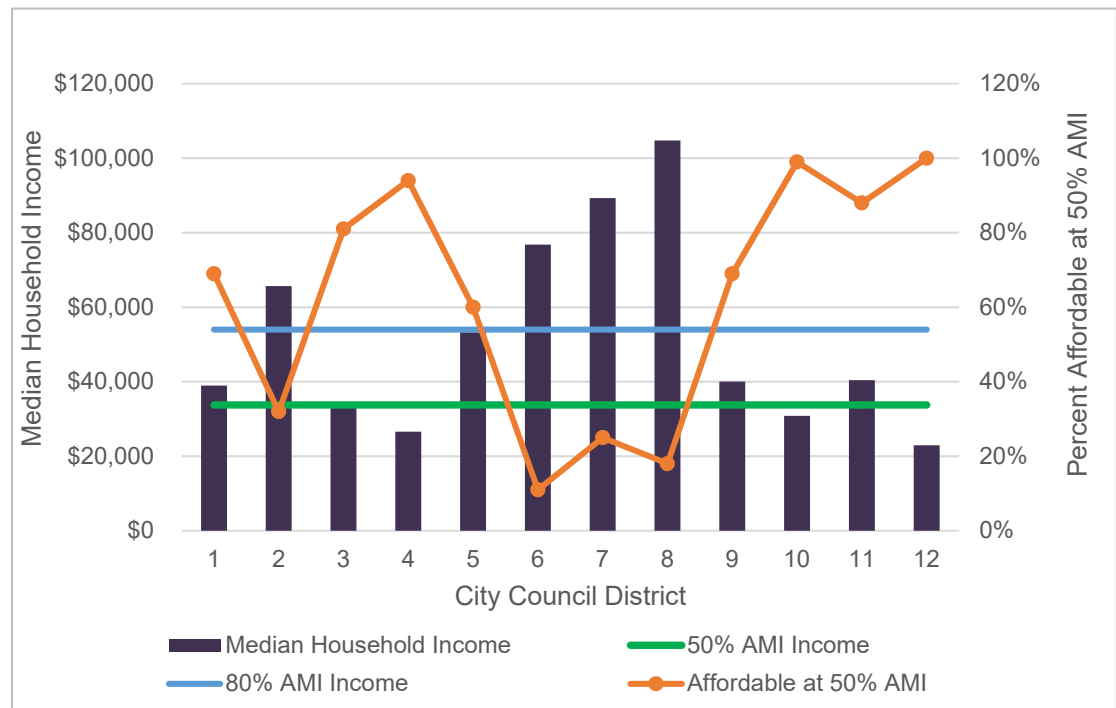
Atlanta's housing is affordable compared to other metropolitan areas, but prices are increasing. In general, Atlanta's housing costs are relatively low compared to other metropolitan areas. Atlanta ranked as the sixth most affordable among the 25 largest metropolitan areas in the country during the third quarter of 2014. The ranking is based on a report from the Atlanta Regional Commission and uses the Housing Opportunity Index as a measure. The index is published by the National Association of Home Builders. It is defined as the share of homes sold in that area that would have been affordable to a household earning the local median income, based on standard mortgage underwriting criteria. In addition to housing costs, other factors, such as proximity to job centers and transportation costs, affect affordability.

During the third quarter of 2014, metropolitan Atlanta's median sales price for an existing single-family unit was \$159,500, according to the National Association of Realtors' quarterly Metropolitan Area Prices and Affordability and Housing Affordability Index. The median sales price rose to \$184,500 during 2016, a 16% increase from 2014. Of the 25 largest metropolitan areas, nine grew at a rate equal to or higher than Atlanta's growth during this time.

### Affordable Housing is Unevenly Dispersed Throughout the City

Affordable housing is more concentrated in areas of the city with median household incomes which would be defined as low income by HUD. City Council districts with higher median household incomes tend to have lower percentages of affordable housing (see Exhibit 4). For example, the median household income in district 12 is \$22,909, and 100% of the homes in the district are affordable at 50% of the area median income. In contrast, the median household income in district 8 is \$104,740 and 18% of the homes are affordable at 50% of the area median income.

**Exhibit 4: Higher Income Districts Have Lower Percentages of Affordable Housing**



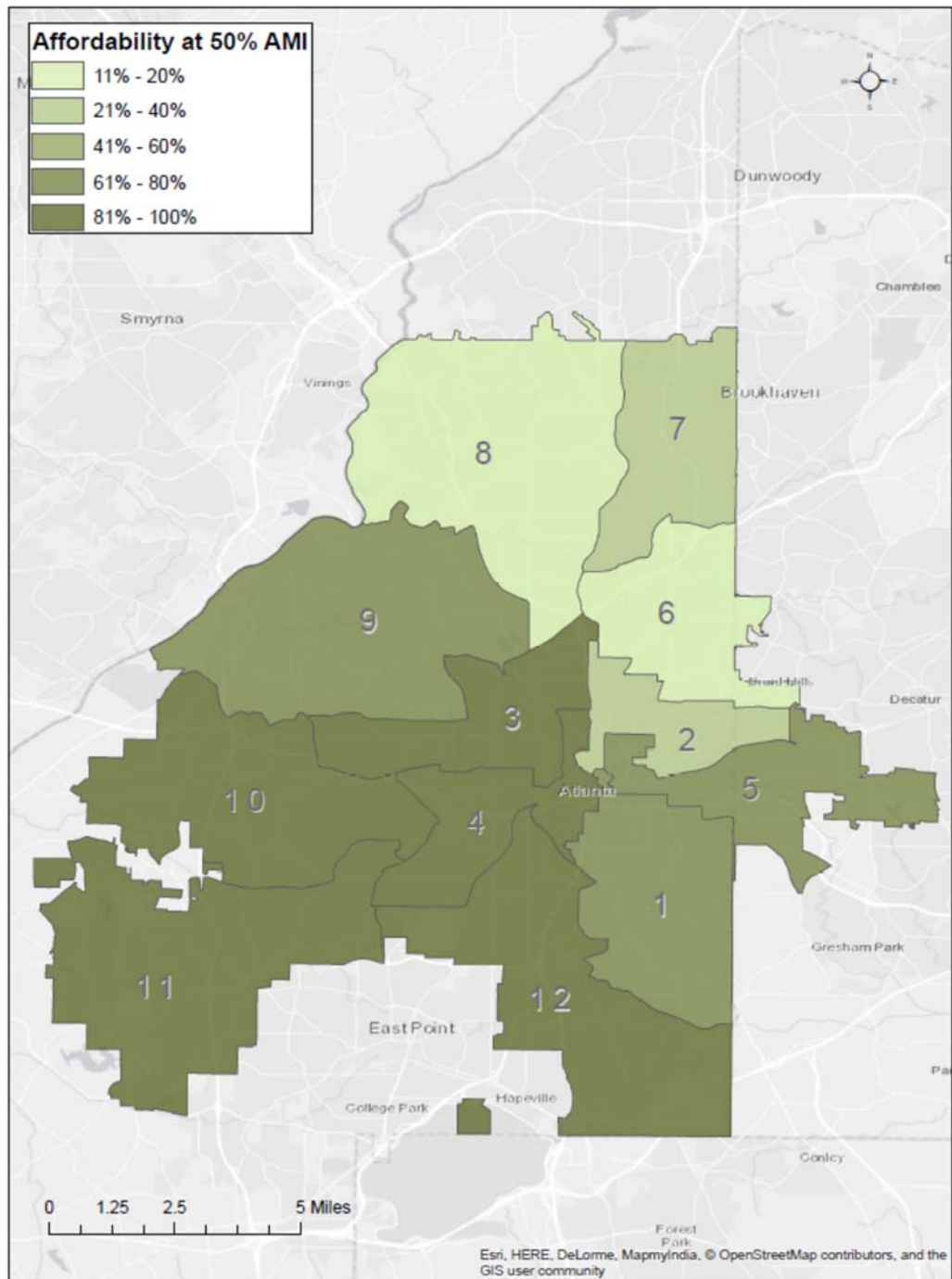
**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and income data from U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016

Eight districts have median household incomes that are less than \$54,000, which is 80% of the area median income for a household of four. These eight districts have median incomes which would be defined as low-income by HUD. Four of those eight have median incomes that are less than 50% of the area median income, or \$33,750. Four districts have median household incomes that are higher than 80% of the area median income, noted by the blue line in Exhibit 4, and so median incomes in those districts would not be defined as low income by HUD. Invest Atlanta's Housing Strategy report identifies eliminating concentrated poverty as one of the city's challenges that led to the creation of the housing strategy. Concentrated poverty has been shown to contribute to high crime rates, unemployment rates, high school dropout rates, and health problems.

One of the city's goals is to create mixed-income communities, which are developments consisting of housing units with some market-rate housing, as well as housing available to low-income residents below market rate. Effective mixed-income communities are more stable than those with concentrations of low-income housing and provide opportunities for socioeconomic growth. City code defines mixed-income housing for the purposes of public subsidies as housing that contains at least 33% affordable housing units but doesn't address the balance of market rate units.

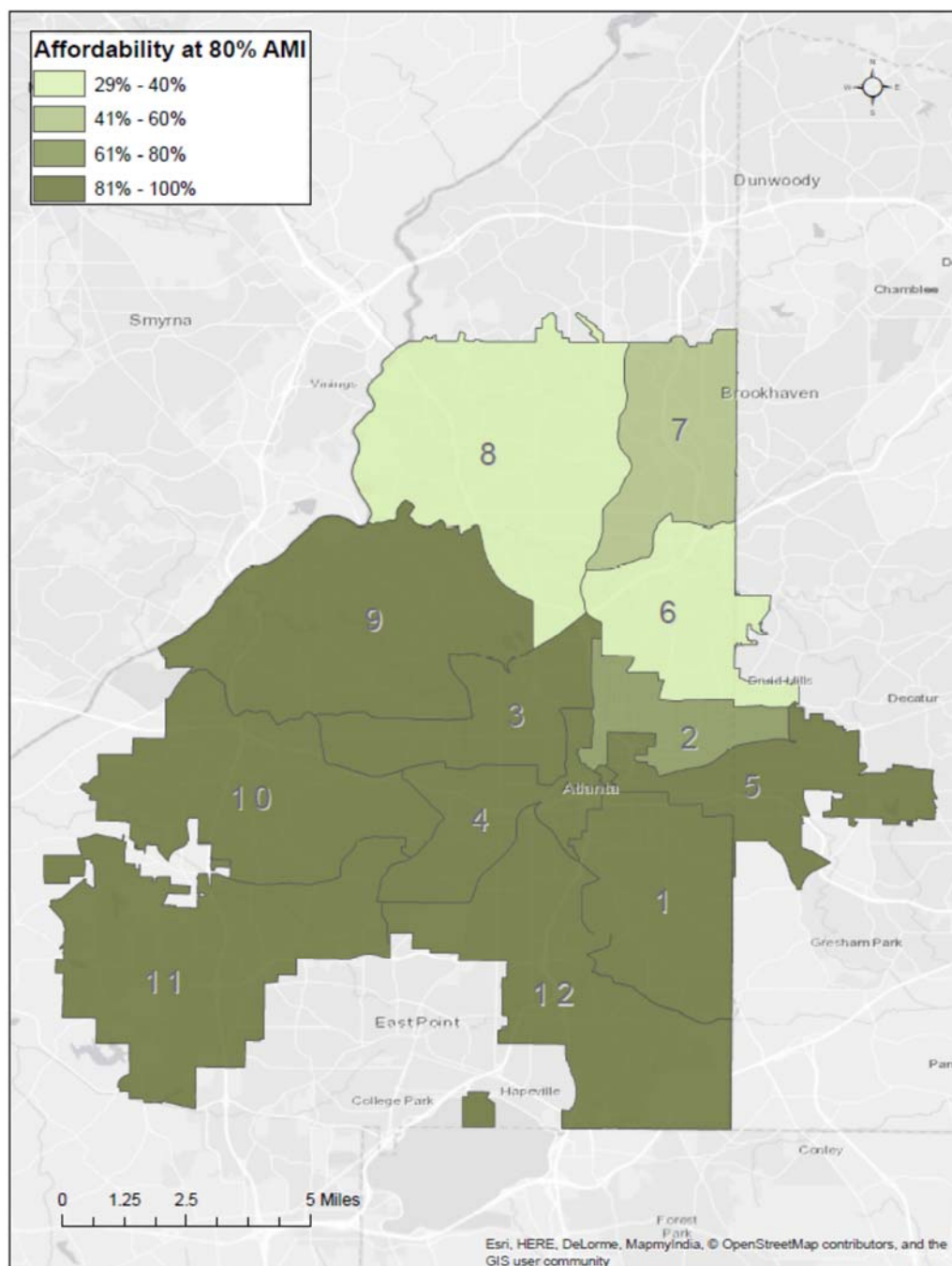
The maps in Exhibits 5 and 6 illustrate the distribution of affordable housing in the city based on incomes that are 50% and 80% of the area median income. The maps highlight the concentration of affordable housing in lower income areas of the city. As shown on the maps, districts in the southern parts of the city have higher percentages of homes affordable at 50% and 80% of the area median income. City Council districts 2,6,7, and 8, in the northern part of the city, contain smaller percentages of affordable housing, and median incomes in those districts are not defined as low income by HUD. The city's affordable housing policies should address the unbalanced distribution between the northern and southern parts of the city.

**Exhibit 5: Higher Percentages of Affordable Housing at 50% of AMI in South Atlanta**



**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and income data from U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016

**Exhibit 6: Higher Percentages of Affordable Housing at 80% of AMI in South Atlanta**



**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and income data from U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016

About 57% of the housing in the tax allocation districts is affordable to households earning at least 50% of the area median income, compared to 55% citywide. Atlantic Station has the lowest percentage of affordable housing at 34%; Campbellton Road has the highest, at 100% (see Exhibit 7). About 44% of the housing in the BeltLine and Eastside districts is affordable at 50% of the area median income.

**Exhibit 7: Housing Affordability Varies Among Tax Allocation Districts**

Tax Allocation District	Total Single-Family Parcels with Buildings	Affordable at 50% AMI	Affordable at 80% AMI
Atlantic Station	1,598	34.0%	78.5%
Beltline	3,012	44.4%	73.6%
Campbellton Road	387	100%	100%
Eastside	3,372	44.2%	86.2%
Hollowell/M.L. King	182	98.4%	98.9%
Metropolitan Parkway	150	96.7%	98.7%
Perry/Bolton	2,063	66.7%	81.9%
Princeton Lakes	872	66.6%	99.3%
Stadium Neighborhoods	185	97.8%	99.0%
Westside	2,781	77.8%	94.5%
<b>Total</b>	<b>14,602</b>	<b>57.4%</b>	<b>85.3%</b>

**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest; income data from HUD, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016.

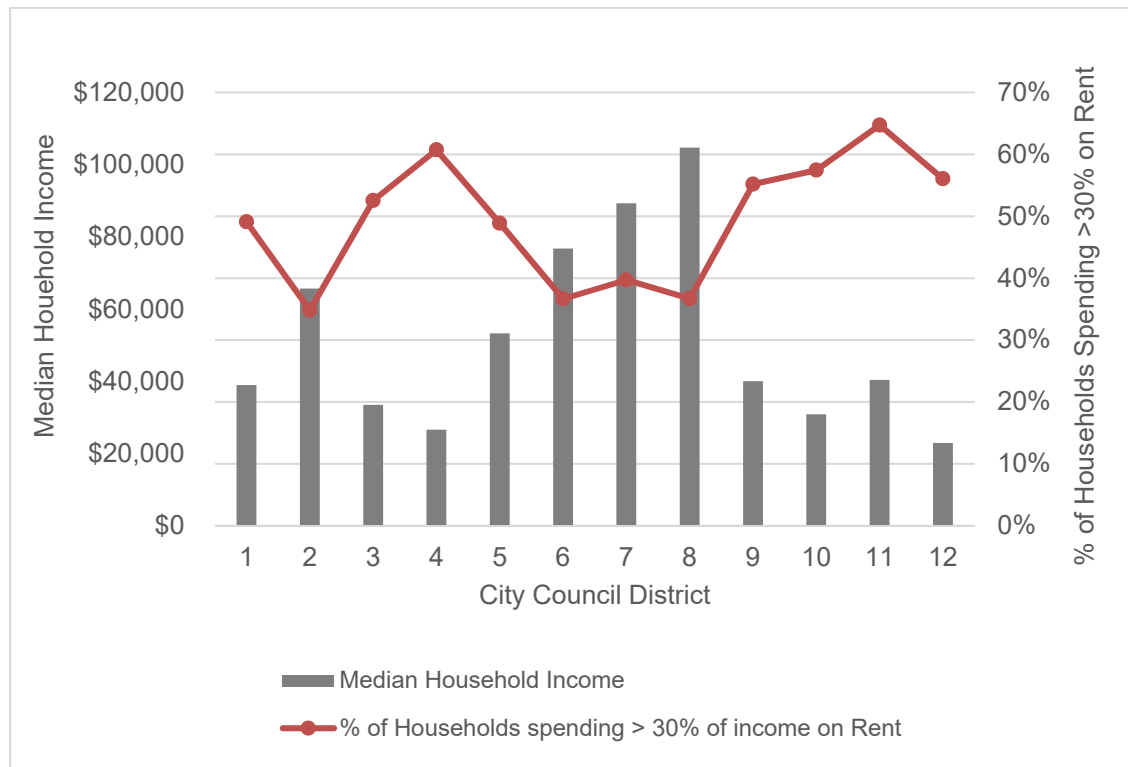
**Renters in All Council Districts Are Cost-Burdened**

Over half of the households who rent in the city are cost-burdened, paying more than 30% of household income on rent. An estimated 26% of renting households are paying 50% or more of their incomes on housing. The percentage of cost-burdened households varies by district, but more households in lower-income districts are cost burdened (see Exhibit 8). Of the approximately 99,000 households who rent in the city, about half are cost burdened.

City Council districts 2,6,7, and 8—the districts with median household incomes not defined as low-income by HUD—have lower percentages of cost-burdened renters. Because increased home values also drive up rental costs, the percentage of cost-burdened renters will likely increase as home prices continue to move upward unless the supply of homes is increased enough to exceed demand.



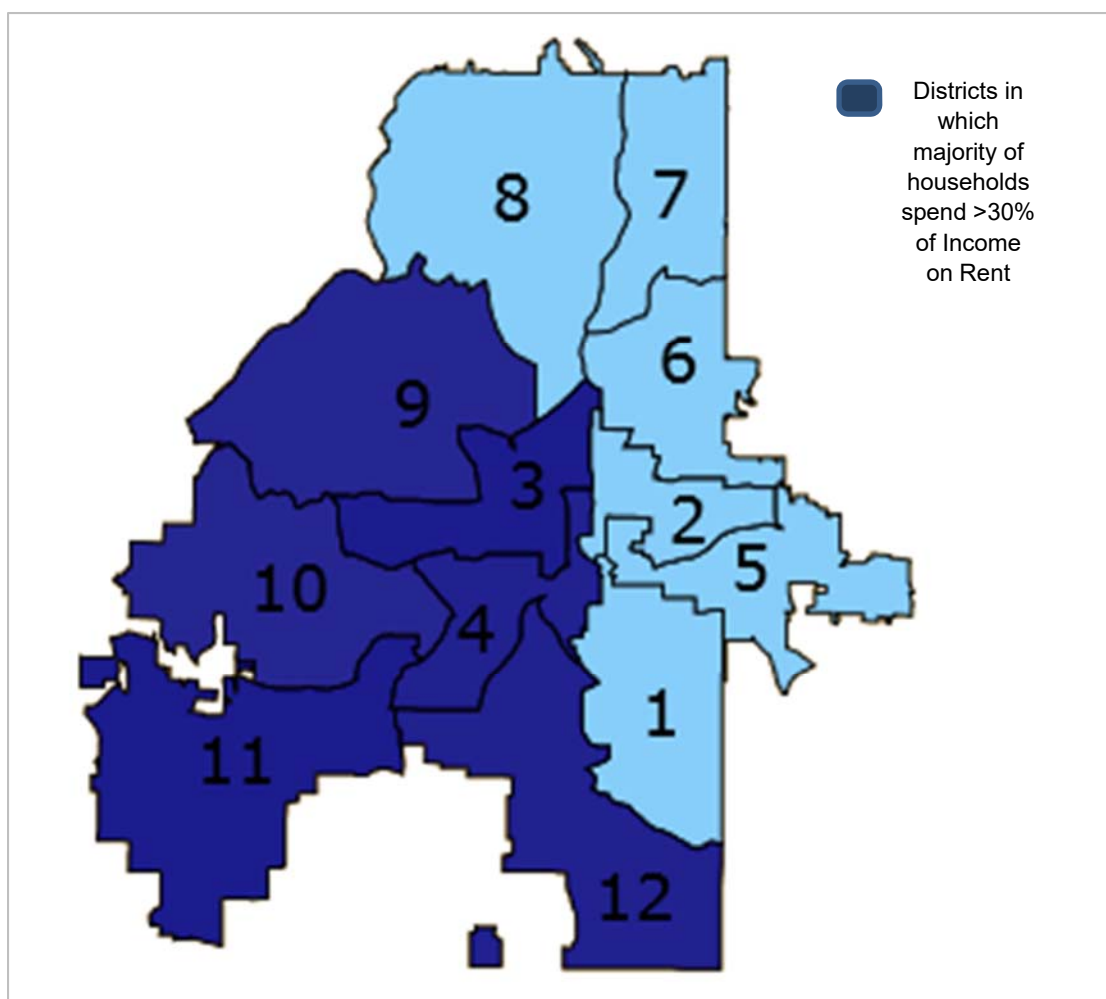
**Exhibit 8: All Council Districts Contain Cost-Burdened Rental Households**



**Source:** U.S. Census, American Community Survey (ACS) - 2011 through 2015

Most renters who pay more than 30% of income on rent are in lower-income areas of the city (see Exhibit 9). The distribution of cost burdened households is similar to the maps in Exhibits 5 and 6; most of the cost burdened renters are located within the southern parts of the city.

### Exhibit 9: High Percentage of Renters in South Atlanta Are Cost-Burdened



Source: U.S. Census, American Community Survey (ACS) - 2011 through 2015

#### Affordable Housing Created Through Subsidies to Developers Unlikely to Meet Demand

Housing subsidies to developers have created a limited amount of housing and about half of the subsidized units are located in areas that are already affordable. Invest Atlanta and the Office of Housing's portfolios of affordable housing as of March 2017 included approximately 1,200 affordable units within 27 housing developments. The portfolios primarily include housing created through subsidies provided to developers to build affordable rental housing.

Some subsidized developments are in areas that lack access to amenities such as above average schools and public transportation. Future efforts for subsidized affordable housing should target areas with positive quality of life factors such as public transportation, access to

education, and proximity to job centers, which was identified as a priority in the 2016 Comprehensive Development Plan.

We conducted a random sample of 25 units from Invest Atlanta and the Office of Housing. Invest Atlanta also provided monitoring reports for developments containing these sampled units. We found that the city properly monitored all sampled developments according to the terms of applicable land use restriction agreements. Developers received financial incentives from Invest Atlanta to build the affordable rental units.

Monitoring of subsidized rental developments is consistent with requirements in the land use restriction agreements. We randomly sampled 25 rental units from Invest Atlanta and the Office of Housing's portfolios to review tenant eligibility. Invest Atlanta also provided monitoring reports for developments containing these sampled units. We found that the city properly monitored all sampled developments according to the terms of applicable land use restriction agreements (see Exhibit 10).

Developers qualified for city subsidies by agreeing to create a minimum number of rental units affordable to households earning between 50-80% of area median income. Additionally, housing costs for affordable units cannot exceed 30% of household income. The rents are capped below market rate.

# Exhibit 10: Subsidized Rentals Are Adequately Monitored in Sample of 25

Development Name	Number of Units Sampled	Subsidy Type	Met Monitoring Criteria?	Number of Required Affordable Units	Number of Affordable Units Created	Total Units Created	% AMI Per LURA	Affordability Period
Adamsville Green	5	HOB	Y	18	81	90	60%	15 years
Briarcliff Summit	2	HOB	Y	40	200	200	60%	15 years
City Lights	4	HOME/HOB	Y	32	80	80	50%/60%	20 years
Flats at Ponce City Market	1	TAD	Y	52*	52	259	80%	15 years
GE Tower	4	HOB	Y	81	177	201	60%	15 years
Providence	4	HOB	Y	96	240	240	60%	15 years
Reynoldstown Senior Residences	2	TAD	Y	28	55	69	60%	15 years
Stanton Village	1	TAD	Y	7	43	43	60%	15 years
Villas at Lakewood	2	HOME/HOB	Y	77	163	192	50%/60%	15 years
<b>Total</b>	<b>25</b>	<b>-</b>	<b>-</b>	<b>431</b>	<b>1,091</b>	<b>1,374</b>	<b>-</b>	<b>-</b>

\*Not to exceed 20%

**Source:** Invest Atlanta portfolio; land use restriction agreements; auditor sample results

The land use restriction agreements for the 25 sampled units required developers to create housing for households earning no more than 60-80% of area median income; however, we found that of 25 units, 20 tenants earned incomes less than 30% of area median income.

Our sample of 25 city-subsidized rental units represented 2% of the units listed on Invest Atlanta and the Office of Housing's monitoring reports. We visited the nine developments to review documentation to assess compliance with the loan or grant agreement terms. The city subsidizes developments with three different financial sources:

- Housing Opportunity Bond Fund (HOB)—provides low interest loans to developers to help finance affordable workforce housing acquisition, construction, or renovation.
- HOME Investment Partnership Program (HOME)—federally funded program that funds costs associated with new construction, acquisition, and rehabilitation of rental properties for low to moderate-income families and individuals.
- Tax allocation districts (TADs)—financial incentives, derived from property tax increments, provided to developers to make improvements within tax allocation districts that are targeted for increased investment.

Loans and grants to developers are governed by land use restriction agreements (LURA). Property managers submit documents for each subsidized unit to indicate occupancy dates and percentages, tenant income certification forms, reports showing the program type and number of days the units were vacant, and certificates showing compliance with monitoring requirements. These documents are reviewed at least annually by Invest Atlanta, which also conducts on-site reviews to ensure compliance with the grant agreements. Although our random sample didn't contain units administered by the Department of City Planning's Office of Housing and Community Development, the office monitors compliance with federal grants for new construction and rehabilitation.

Subsidies to developers have created a small number of affordable units in the city. Invest Atlanta and the Office of Housing's portfolios of affordable housing as of March 2017 included about 1,200 affordable units within 27 housing developments. The portfolio primarily includes apartments and condominiums created through subsidies provided to developers. The housing created through the developer subsidies is a small number compared to the estimated 52,000 renters in the city who pay more than 30% of their income on housing.

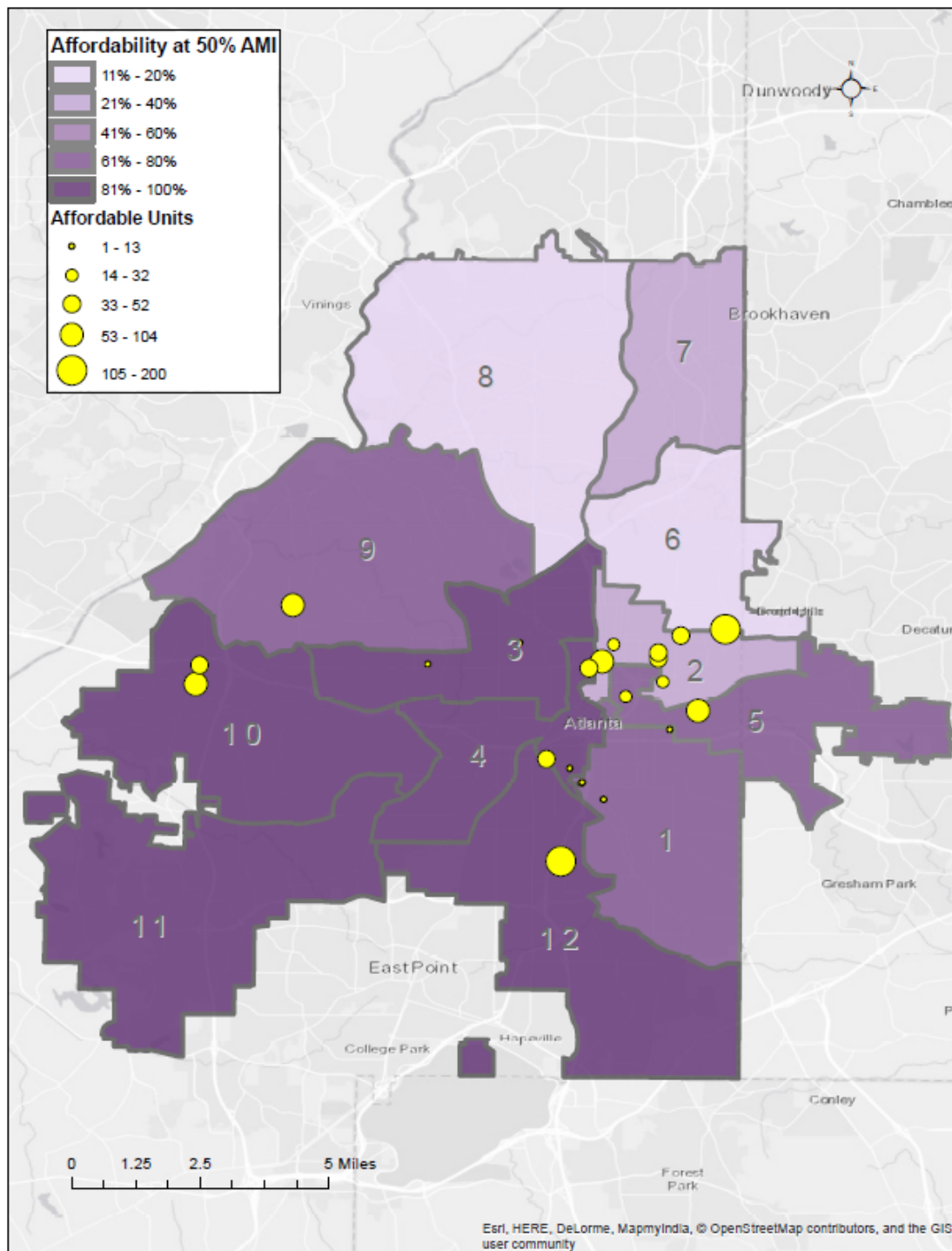
Invest Atlanta's Housing Strategy listed tax allocation districts as a method to geographically target affordable housing initiatives; however, the tax allocation districts have yet to create planned levels of affordable housing. In its 2016 annual report, for example, BeltLine reported that it created 785 affordable units within the tax allocation district since 2006. This is substantially short of its goal of creating 5,600 affordable units by 2030. According to staff from the Department of City Planning's Office of Housing, BeltLine has created additional affordable housing units and will release those figures in late summer.

Section 54-1(c) of the city code requires that developers who receive a grant, subsidy, or incentive from the city (through a developmental authority such as Invest Atlanta) to build multi-family residential property must include affordable housing in the development. At least 15% of the total units must be leased to households with incomes up to 80% of the area median income, or 10% of the units must be leased to households with incomes that do not exceed 60% of area median income. The monthly rent cannot exceed 30% of the household's monthly gross income.

Housing subsidies have created housing in areas that are already affordable. About half of the subsidized units in the city's portfolio are located in areas of the city that have median household incomes which would be defined as low-income or very low-income by HUD—earning no more than 80% or no more than 50% of area median income (see Exhibit

11). The city would benefit from creating more affordable housing in areas of the city that are less affordable. According to staff from the Department of City Planning's Office of Housing, although subsidies have created affordable housing in areas that are already affordable, the new housing is of a higher quality than existing affordable units, and additional units are needed for legacy residents that have been displaced through gentrification.

**Exhibit 11: About Half of Subsidized Housing Is Located within Low-Income Areas**



**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and income data from U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016; Invest Atlanta and Office of Housing subsidized housing portfolios.

Areas of the city that are already affordable, in some cases, lack access to amenities such as highly-ranked schools and public transportation. Three of the nine sampled subsidized rental developments were located in areas where the schools were rated as above average; the remaining six were in areas where the schools were ranked as below average, according to Great Schools, a non-profit ranking agency. Three of nine developments are in areas with average access to public transportation, according to the WalkScore website. Five are in areas with some transit, and one is in an area of minimal transit. WalkScore is a private company that assigns a walkability index to areas throughout the country.

Council districts with lower median household incomes and a higher percentage of cost-burdened renters have longer commutes; however, the data does not indicate clearly whether this is due to distance from work or mode of transportation (see Exhibit 12).

**Exhibit 12: Residents in Higher Income Districts Have Shorter Work Commutes**

Council District	Journey to Work (% under 30 min)	Drive to Work	% Who Utilize Public Transportation	% of Households Spending More 30% of Income on Rent	Median Household Income
1	57%	70%	10%	49%	\$38,944
2	74%	67%	6%	35%	\$65,654
3	74%	46%	12%	53%	\$33,435
4	64%	51%	19%	61%	\$26,557
5	63%	70%	8%	49%	\$53,248
6	75%	76%	6%	37%	\$76,764
7	72%	79%	4%	40%	\$89,282
8	77%	84%	2%	37%	\$104,740
9	69%	72%	8%	55%	\$40,014
10	54%	69%	17%	57%	\$30,817
11	50%	66%	19%	65%	\$40,382
12	50%	58%	23%	56%	\$22,909

**Source:** Office of the City Auditor analysis of Esri Business Analyst 2017 estimates based on public and private data sources, including the U.S. Census.

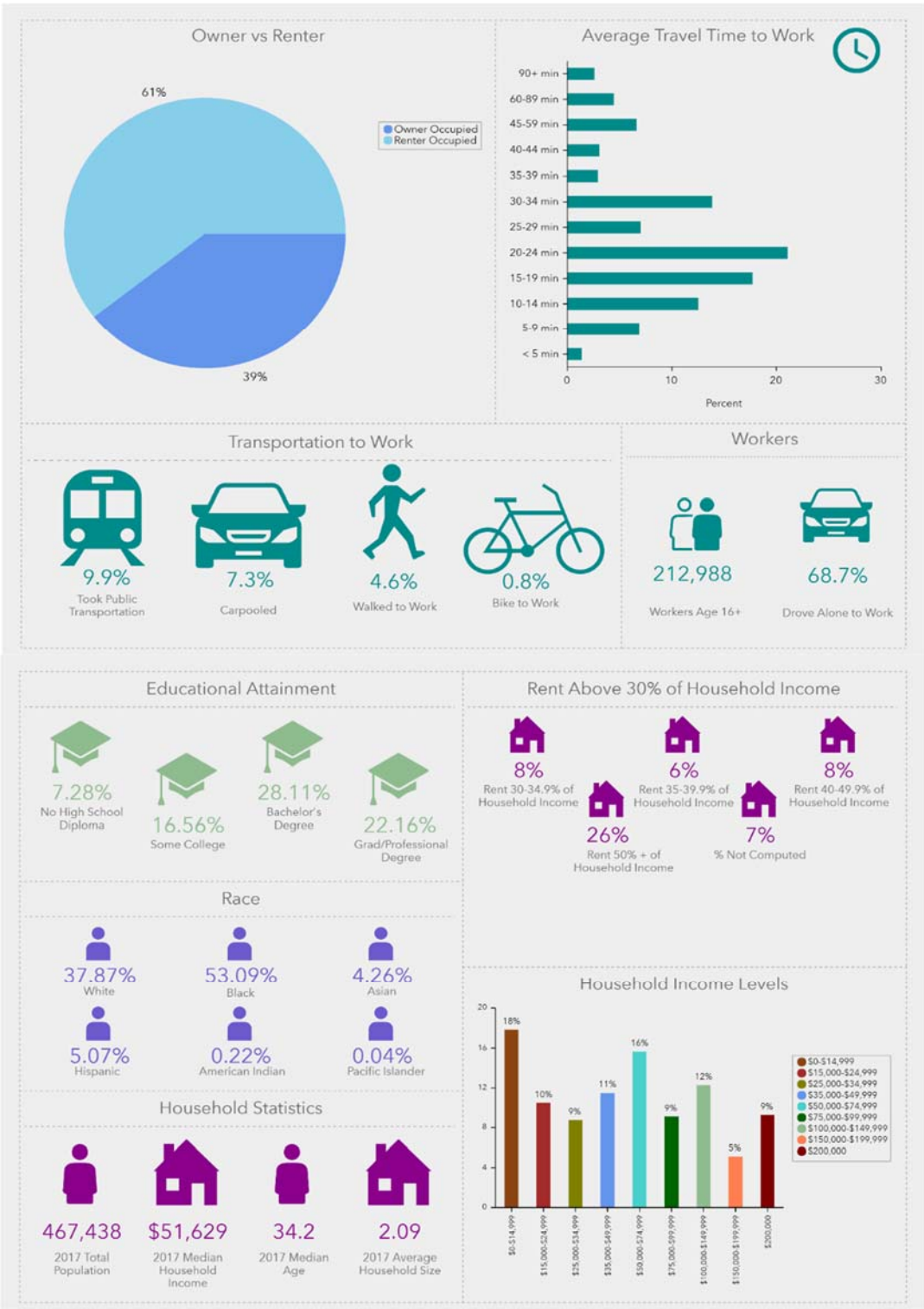
Subsidizing housing in areas without a mix of both high and low economic income levels, an array of owner and renter-occupied homes, and access to amenities limits residents' opportunities for socio-economic growth. Future efforts for subsidized affordable housing should target areas with positive quality of life factors such as public transportation, access to education, and proximity to job centers.



We created citywide and City Council district profiles to show the demographic makeup of each district, as well as illustrate quality of life factors that are valued by the average resident, such as average travel time to work and method of transportation to work (see Exhibit 13). District profiles are included in Appendix B. The data source is 2011-2015 American Community Survey data compiled by the U.S. Census; we also used Esri GIS mapping software.

As shown in the citywide profile in Exhibit 13, 28% of the city's residents earned a bachelor's degree, and another 22% have a graduate degree. The city's more than 467,000 residents are 53% black and 38% white. Citywide, 18% of households have annual income levels of less than \$15,000 and 9% of households have annual incomes above \$200,000. About 26% of the city's renters pay more than 50% of their household income on rent.

Exhibit 13: Citywide Demographic and Quality of Life Profile



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## Strategies Are Needed to Create Additional Affordable Housing and Minimize Negative Impacts of Development

The city's affordable housing goals are incorporated into multiple plans: the Comprehensive Development Plan, the Consolidated Plan, and Invest Atlanta's Housing Strategy. The Comprehensive Development plan is intended to incorporate citywide planning goals. While it incorporates the plans by reference, it does not explicitly include all of the goals from the two plans. Also, the goals included in the Consolidated Plan are not quantifiable or measurable. Alignment of affordable housing goals and development of performance metrics would help to create a more cohesive affordable housing strategy and ensure that the city is achieving intended outcomes for affordable housing. Also, consolidation of city housing data would help provide a cohesive snapshot of the progress of multiple programs. City Council recently passed legislation to reestablish the Housing Commission, which is expected to review existing housing policies in Atlanta and other cities and explore methods of financing affordable housing. The Housing Commission could help coordinate citywide affordable housing policies.

The Atlanta City Council has recently passed legislation intended to increase the amount of affordable housing in the city, including an inclusionary zoning policy that provides incentives to developers to create affordable housing and supports an anti-displacement tax fund philanthropic effort to help prevent homeowners from being displaced by the effects of gentrification. Similar programs have been used in other cities to create affordable housing. In addition to these efforts, the city should also expand the use of other programs such as providing density bonuses to developers and increasing the use of community land trusts.

The city has no mechanism in place to maintain the affordability of homes purchased by buyers. We sampled 33 homes sold to buyers within the Eastside tax allocation district with assistance from Invest Atlanta. We found that within 8 years, 12 were no longer owned by the original buyers. Other cities have longer affordability periods for rentals and also for purchased homes that remain in place through subsequent sales. The city should consider increasing affordability periods for rentals and implementing a mechanism to maintain affordability of purchased homes.

Implementation of proposed zoning quick fixes could reduce some barriers to affordable housing. Proposed zoning changes could allow for

greater density, which would allow developers to build more parcels per acre, making the homes on smaller lots more affordable.

### **A Cohesive Planning Approach Could Improve Results**

The city's Consolidated Plan lacks quantifiable goals, and the Comprehensive Development Plan does not explicitly incorporate all the city's affordable housing goals or lay out clear strategies for accomplishing those goals. Alignment of affordable housing goals and development of performance metrics would help to create a more cohesive affordable housing strategy and ensure that the city is achieving intended outcomes for affordable housing. Also, consolidation of city housing data would help provide a comprehensive snapshot of the progress of multiple programs. City Council recently passed legislation to reestablish the Housing Commission, which is expected to review existing housing policies in Atlanta and other cities and explore methods of financing affordable housing. The Housing Commission could help coordinate citywide affordable housing policies.

Atlanta's citywide affordable housing strategy could be more cohesive, with measurable goals and programs targeted to achieve stated outcomes. Atlanta's housing goals are outlined in three key documents: the city's Comprehensive Development Plan, the City's Consolidated Plan, and Invest Atlanta's Housing Strategy (see pages 1-2). The Consolidated Plan contains no established quantifiable goals. While the city has numerous goals and strategies for creating and maintaining affordable housing, the Comprehensive Development Plan, which is intended to lay out the city's overall goals, does not include all those goals and strategies. Invest Atlanta's Housing Strategy contains metrics for accomplishing its stated goals, but those metrics have not been incorporated into the Comprehensive Development Plan. The Housing Strategy lists six goals to achieve by 2020:

- reduce the number of cost-burdened households by 10% (7,500)
- increase Atlanta population by 10% (42,000)
- reduce the number of vacant structures by 20% (1,500)
- produce or rehabilitate 10,000 residential units for a range of incomes in job-rich and redeveloping areas
- generate \$100 million in new investment to support part of the cost of these units
- ensure that at least 10,000 new and rehabilitated units meet national sustainability and energy efficient criteria

The goals in each of the three documents are similar, but could be better conveyed in the Comprehensive Plan, with specific, measurable goals and performance targets. This would help to provide an overall roadmap to ensure that grant programs, other funding sources, and relevant legislation are aligned to successfully support affordable housing goals.

Key information related to housing programs should be consolidated and more readily accessible. Residents and developers must typically visit the websites of each agency to find information on the affordable housing programs offered. Also, due to conflicting interests or goals, there is limited interagency coordination; for example, Atlanta has little information on how many tax liens the Fulton County Tax Commissioner sells to private entities. The 2015 Housing Strategy recommended improving housing agencies' coordination, such as developing a housing subcabinet, a common application that developers can use to apply for funding from multiple agencies, and a one-stop-shop website for residents and developers to access housing resources and data from multiple agencies. Benefits of coordination include tracking goals, streamlined reporting, comprehensive information for agencies to make informed decisions, timely public access to information, and developers' awareness of areas where Atlanta is targeting investment.

The reestablishment of the Housing Commission should help to target housing efforts. City Council passed Ordinance 17-O-1569 in October 2017, to reestablish the Housing Commission to facilitate the city's affordable housing goals. The purpose of the Housing Commission is to:

- review the housing policies of the city with an emphasis on affordable housing
- review the city's permitting procedures related to the construction and rehabilitation of housing
- explore creative methods of financing affordable housing
- review housing policies, practices, and procedures of other jurisdictions

The Commission is made up of 11 members from various housing agencies and housing advocates that are either appointed by the mayor or city council. It is required to meet at least once a quarter and produce an annual report on its findings and recommendations. City Council initially created the Housing Commission in 1993, but the Commission has not met in recent years. The current legislation also noted that the original Commission never appeared to be codified in the city charter. In reestablishing the Housing Commission, City Council is expressing its intent to develop citywide affordable housing policies.

To provide a clear roadmap for accomplishing citywide affordable housing goals, we recommend that the Commissioner of the Department of City Planning compile affordable housing goals from the various entities into the Comprehensive Development Plan and ensure that those goals are measurable and contain performance targets. The commissioner should also work with stakeholders to consolidate key information related to available housing programs and make that information more readily available to citizens and developers.

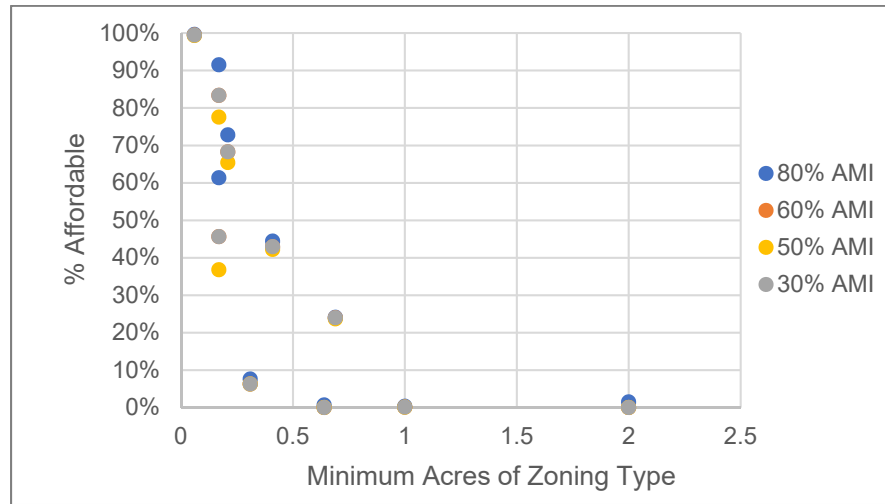
### **Proposed Zoning Changes Should Result in Additional Affordable Housing**

The Department of City Planning's proposed "quick fixes" to the zoning ordinance could encourage developers to create additional affordable housing. The changes include clarifying zoning code provisions and allowing for greater density by reducing setbacks. We found that more generous density allowances enable developers to build more units on smaller lots, which tends to reduce housing costs. Longer term changes to the zoning code are also planned over a three to five-year period.

Proposed zoning quick fixes could reduce some barriers to affordable housing. The Department of City Planning has worked with a consultant to develop "quick fixes" to the city's zoning ordinance that are intended in part to provide consistency with the city's Comprehensive Development Plan and state and federal law. Proposed zoning quick fixes would clarify ambiguous and conflicting requirements, delete unused districts, and allow unified development plans in some districts with conformance based on plan rather than lot. Reducing complexity and uncertainty in permitting could make it more profitable for developers to build affordable housing. Other proposed quick fixes would allow greater density by reducing setback requirements, reducing minimum lot size for single-family and two-family houses in mixed-use districts, and eliminating requirements for independent driveways. The Department of City Planning plans to implement the proposed quick fixes over 6 to 12 months and overhaul the zoning code in three to five years, which will also allow additional housing density.

Smaller lot sizes are more affordable. Lots that are zoned for a smaller size are more affordable (see Exhibit 14). As shown in the exhibit, the percentage of affordable housing is highest where the lot sizes are smallest (between 0 and 0.5 acres). This indicates that in general, higher-density areas are likely to be more affordable, resulting from more parcels per acre.

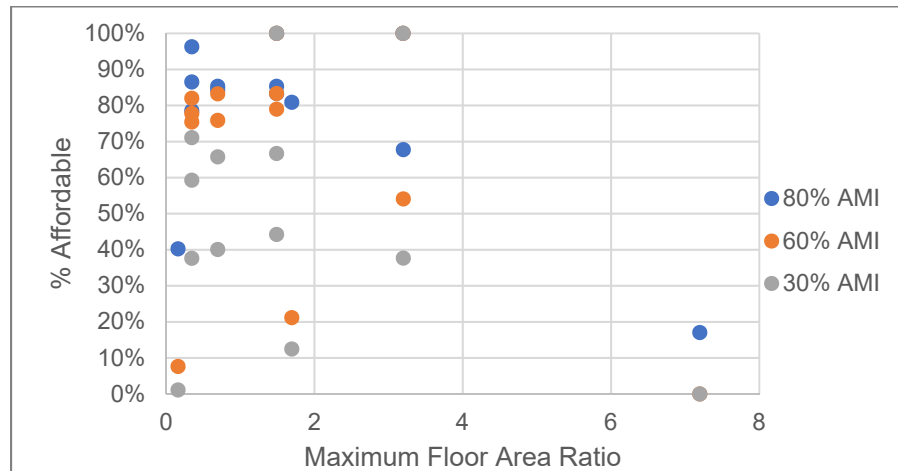
**Exhibit 14: Smaller Lots Are More Affordable**



**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and income data from U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016; zoning lot sizes derived from the Department of City Planning's summary of zoning code districts

We did not, however, see a relationship between affordability and floor area ratio, another measure of density, perhaps reflecting that high-end high-rises are both dense and expensive (see Exhibit 15). Increased density alone will not necessarily promote affordability.

**Exhibit 15: Floor Area Ratio Doesn't Affect Affordability**



**Source:** 2017 Fulton County property tax digest and 2016 DeKalb County property tax digest and income data from U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Comprehensive Housing Market Analysis, Atlanta-Sandy Springs-Roswell*, as of May 1, 2016; zoning lot sizes derived from the Department of City Planning's summary of zoning code districts

Proposed longer term changes in the zoning code would create additional housing density. Proposed changes would allow accessory dwelling units and define/permit the “missing middle housing”—duplex, triplex, fourplex, courtyard, bungalow court, townhouse, multiplex, and live/work dwelling units. Proposed changes would also examine infill and scale regulations in residential districts, revisit the necessity of special administrative permits, eliminate special exceptions, consider the use of as-of-right for common variances, and reduce parking requirements in dense areas.

The city’s zoning code governs the physical land use and development of the land, which is divided into zones or districts, and limits the uses of land in each district. These zoning districts also regulate the height, overall size, and placement of buildings on a lot, the density at which buildings may be constructed, and the number of parking spaces that must accompany each new building. The City of Atlanta’s Office of Zoning, within the Department of City Planning, is responsible for enforcing the zoning code provisions.

The current zoning code was adopted in 1980 and expanded over the years. The current zoning code limits density, buildable surface area, and height, which affect affordability. The code contains nearly 200 distinct zoning areas, sub-areas, and overlays, including special public interest sub-areas, landmark districts, and historical districts, with residential components.

### **Atlanta is Implementing Methods Used in Other Cities to Create and Preserve Affordable Housing**

The Atlanta City Council has recently passed legislation intended to increase the amount of affordable housing in the city. This includes an inclusionary zoning policy to provide incentives to developers to create affordable housing and an anti-displacement tax fund program to help prevent homeowners from being displaced by the effects of gentrification. Similar programs have been used in other cities to create affordable housing. In addition to these efforts, the city should also expand the use of other programs such as increasing affordability periods, providing density bonuses to developers, and increasing the use of community land trusts.

Atlanta recently adopted inclusionary housing legislation to create affordable housing. To encourage the creation of affordable workforce housing, City Council recently passed legislation for multi-family housing built within the BeltLine Overlay District. According to Ordinance No. 17-O-1542, passed in November 2017, developers who build ten or more residential rental units at one location within a half-mile of the BeltLine



must make 15 percent of the units affordable to households with incomes of no more than 80 percent of the area median income or 10 percent of units affordable to households with incomes that do not exceed 60 percent of area median income. The monthly rent amount, excluding utilities and fees, cannot exceed 30 percent of the household monthly gross income. In lieu of the affordable housing, developers can opt to pay a fee into the BeltLine Affordable Housing Fund. The legislation allows developers to receive parking incentives, as well as incentives that allow for greater density than that currently allowed by the zoning code. The legislation requires affordable units to be dispersed among the market rate units and remain affordable for 20 years from the date the certificate of occupancy is issued. The legislation has been referred to as an “inclusionary zoning” policy, which links market-rate development to the production of housing that is affordable to lower-income households. According to the Center for Housing Policy, the research arm of the National Housing Conference, more than 500 local jurisdictions in the United States have implemented inclusionary housing policies. Although the success of these programs depends on the nature of the local housing market and how the programs are designed, the programs have been shown to produce some affordable housing without leading to significant declines in overall housing production or increases in market prices. Cities that have found the most success with this type of program typically have mandatory inclusionary zoning. Some cities allow developers to pay into a fund in lieu of creating affordable units, which could reduce its ability to create mixed income communities.

Affordable housing impact statements should provide meaningful information to decision-makers about the effect of proposed legislation on the city’s housing stock. The City Council passed Ordinance 14-O-1614 November 16, 2015. Effective, July 1, 2016, it requires any official who is planning to propose legislation that will affect housing stock to submit a draft of the legislation to the Office of Housing. The Office of Housing is required to produce an affordable housing impact statement that estimates the number of units affordable at different income levels added or decreased over 30 years following the enactment of the proposed legislation. The legislation is intended to encourage coordination among departments and encourage developers to include more affordable housing in their plans.

The city supports an anti-displacement tax fund program to help prevent homeowners from being displaced by the effects of gentrification. The City Council passed Resolution No. 16-R-4683 in December 2016, which requested the Department of City Planning provide a report on the establishment of displacement free zones in the

city. Also called “eviction free zones,” the program, funded through the Westside Future Fund, is used to prevent the displacement of low-income property and business owners and tenants from the impact of gentrification in urban neighborhoods. The program provides a cap on annual property tax increases. The initial communities identified under the program are the English Avenue, Vine City, Ashview Heights, and Atlanta University Center neighborhoods. Philanthropic donations fund the program. The program pays property tax increases for eligible homeowners based on income and will provide assistance for up to 20 years. Property tax reductions and freezes have been used in other cities to help retain long-time residents at risk of displacement because of gentrification. Boston’s city council passed legislation in 2014 allowing homeowners whose taxes have grown by 10% or more to defer property tax payments until the homeowner sells the property. Pittsburgh, Detroit, and Philadelphia have also adopted similar programs.

Gentrification is generally defined as the transformation of neighborhoods from low value to high value, according to the Centers for Disease Control and Prevention. This change can result in the displacement of long-time residents and businesses due to higher rents, mortgages, and property taxes. In Atlanta, as in other cities, gentrification is occurring because of neighborhood revitalization and reinvestment.

The Department of City Planning’s Office of Housing is conducting an Equitable Housing Needs Assessment project to assess the gap between housing need and supply. The assessment should provide a basis for developing additional affordable housing policies and projects.

Atlanta should consider longer affordability periods and a mechanism to maintain them through subsequent sales. In general, other than the recent inclusionary zoning legislation, Atlanta’s city code provisions related to affordable housing do not address affordability periods. The affordability period required in the inclusionary zoning provision for multi-family rentals, Ordinance No. 17-O-1542, is 20 years.

Affordability periods between the city and developers in agreements we assessed ranged from 9 months to 20 years. Most affordability periods were for 15 to 20 years. Austin’s city code provides for 5, 15, 40, and 99-year affordability periods for different areas of the city (99-year periods for ownership and 40-year periods for rentals). Boston’s city code provides for 30-year affordability periods with the option of a 20-year extension for ownership and perpetual affordability for rentals. Seattle’s city code provides for affordability periods of 50 years for rentals and for-purchase homes.

The city has no mechanism in place to maintain the affordability of subsidized homes once they are sold. We sampled 33 affordable homes sold to buyers with assistance from Invest Atlanta (see Exhibit 16) and found that 21 remained with the original buyers. Of the 12 homes that were no longer owned by the original buyers, 9 had been sold and 3 were liquidated through foreclosures. The initial purchase of 27 of the 33 homes occurred between 2007 and 2009. Resales ranged from almost two years to eight years after purchase; most resales occurred between five to eight years after purchase. Resales were less than the original purchase price for eight of the nine resale affordable units. One resale affordable unit sold for a minimal amount more than the initial sale price after seven years. Affordability requirements for the sale price of the units only applied to the initial eligible buyers and are no longer intact for the 12 resold or liquidated units.

We obtained a list of 164 affordable units within 5 housing developments from Invest Atlanta. All the properties were part of the Eastside tax allocation district's affordable housing purchase program. We selected a random sample of 33 unique units (20% of the total units provided) from this list and examined Fulton County Tax Assessor records to determine whether the initial buyers had sold the units.

**Exhibit 16: The City Has No Mechanism to Maintain Affordability of Subsidized For- Purchase Homes**

Development Name	Number of Affordable Units	Number of Sampled Affordable Units	Subsidy Type	Number of Units Resold
Oakland Park	10	4	TAD	1
Renaissance Walk (formerly Sweet Auburn)	6	1	TAD	0
The Reynolds	23	5	TAD	3
Tribute Lofts	22	6	TAD	3
Twelve Centennial Park	103	17	TAD	5
<b>Total</b>	<b>164</b>	<b>33</b>	<b>-</b>	<b>12</b>

**Source:** Invest Atlanta portfolio; development agreements; auditor sample results

Invest Atlanta helps buyers purchase constructed housing units in the Eastside tax allocation district. Invest Atlanta provides a subsidy in the form of a deferred loan, also called a "buy-down," equal to the difference between the market price and the affordable price of the housing unit. Invest Atlanta enters into a sales contract for the unit with the developer for the affordable price. Invest Atlanta then assigns this sales contract for the unit to the buyer for market rate. This market rate includes the amount of the affordable unit plus the amount of the

Invest Atlanta buy-down. The buyer obtains a loan from a lender for the affordable price. The Invest Atlanta buy-down secures debt and lowers the amount of the down payment the buyer must provide at the time of obtaining the loan from the lender. The buyer signs an acknowledgement of the buy-down and contributes at least \$1,500 toward the down payment. The buyer must obtain a 30-year, fixed rate mortgage when purchasing a unit and make 80% of the area median income or less to qualify to purchase. The developer receives payment for the unit at the time of closing.

If the initial buyer sells the unit, proceeds first go to repayment of the loan from the lender, second to any existing deferred loans, third to repayment of the Invest Atlanta buy-down, and last to the initial buyer.

Atlanta could increase the use of community land trusts. A community land trust is a tool used to provide affordable housing through land leasing and home ownership. In this mechanism, a non-profit corporation purchases land and leases it to a homeowner, who purchases the structure (residence) on the land at an affordable price. Although the trust maintains ownership of the land, the home can be sold to multiple homeowners, keeping the home permanently affordable. When homeowners decide to move, the trust can repurchase homes at a formula-driven price to maintain affordability. Atlanta Land Trust Collaborative was founded in 2008 and is structured to finance land purchases through public and private donations. Invest Atlanta is currently seeking developers to purchase or lease and redevelop its inventory of 24 homes in the Westside tax allocation district (English Avenue and Vine City) as affordable housing. Invest Atlanta would retain the ownership of the land in order to preserve affordability, similar to the land trust model.

Atlanta could increase the use of density bonuses. Density bonuses allow developers to build more units at a site than zoning rules typically allow. Atlanta has used this option as an incentive to developers in its inclusionary zoning legislation; however, in the Housing Strategy report, residents expressed concerns about the impacts of increasing density. According to the Urban Land Institute, well-designed higher-density housing can offer a shorter commute, sidewalks, and amenities like shops, restaurants, libraries, schools, and public transportation within walking distance.

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## Recommendations

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To facilitate the city's efforts to create and maintain affordable housing, the Commissioner of the Department of City Planning should work with city leaders and stakeholders to incorporate the following in future policies:

1. Address the unbalanced distribution of affordable housing between the northern and southern parts of the city.
2. Target areas with positive quality of life factors such as public transportation, access to education, and proximity to job centers when subsidizing affordable housing developments.
3. Consolidate key information related to available housing programs and make that information more readily available to citizens and developers.
4. Consider longer affordability periods when subsidizing rental housing.
5. Develop a mechanism to maintain affordability when subsidizing for-purchase housing.
6. Expand the use of programs such as providing density bonuses to developers and increasing the use of community land trusts.



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## Appendices

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## Appendix A: Management Review and Response to Audit Recommendations



KEISHA LANCE BOTTOMS  
MAYOR

**CITY OF ATLANTA**  
DEPARTMENT OF CITY PLANNING  
55 Trinity Avenue, S.W., Suite 1450 – Atlanta, Georgia 30303  
TEL: 404-330-6070 – FAX: 404-546-8654  
<https://www.atlantaga.gov/government/departments/city-planning>

TIM KEANE  
COMMISSIONER

### MEMORANDUM

**TO:** Amanda Noble, City Auditor  
**FROM:** Tim Keane, Commissioner  
**DATE:** June 22, 2018  
**SUBJECT:** Department of City Planning Performance Audit – Affordable Housing  
**CC:** Marion Cameron, Chair, Audit Committee  
Stephanie Jackson, Deputy City Auditor  
Terri Lee, Deputy Commissioner  
Valerie Bernardo, Director of Housing & Community Development

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#### Summary

The Department of City Planning (DCP) is pleased to provide our response to the recommendations put forth in the 2018 *Performance Audit: Affordable Housing* report. DCP substantially agrees with each of the six (6) recommendations as they represent action steps that align with the direction the Department is taking to realize the vision of four of the five *Atlanta City Design* core values, Equity, Access, Progress, and Ambition.

DCP's mission is to enable high quality, sustainable and equitable growth and development of Atlanta by facilitating more options for travel, abundant housing for all people, thriving neighborhoods, exceptional design in architecture and public spaces, preservation of historic resources, innovative regulatory practices, safe and durable buildings, attentive customer service and public engagement in all our work. The Department's Office of Housing and Community Development helps to realize this mission by promoting the development of affordable housing and supporting programs, projects, and partners that help to stabilize neighborhoods and enhance the quality of life for Atlanta's residents.

Attached please find our proposed actions, comments, and timeframes for implementation for each of the City Auditor's recommendations. We have attempted to provide a thorough explanation of our intended actions as well as context regarding our approach and progress made to date.

Report #17.01	Report Title: Affordable Housing	Date: June 2018
Recommendation Responses		
Rec. 1	We recommend that the Commissioner of the Department of City Planning work with city leaders and stakeholders to address the unbalanced distribution of affordable housing between the northern and southern parts of the city.	Agree
<p><b><u>Proposed Action:</u></b> Equitable Housing Needs Assessment – Report and Implementation</p> <p><b><u>Implementation Timeframe:</u></b> The City of Atlanta Equitable Housing Needs Assessment report will be completed by August 2018; Implementation of equitable affordable housing strategy will be on-going (i.e. 1-10 years), with reports issued annually evaluating our accomplishments and changes in market conditions.</p> <p><b><u>Comments:</u></b> The Department of City Planning is currently leading the Atlanta Equitable Housing Needs Assessment to establish the City's equitable housing goals along with methods of measuring success as Atlanta's population and housing needs grow and change across various parts of the City. The report identifies geographic disparities in housing supply in high opportunity areas for residents with lower incomes. Additionally, the report quantifies the need and cost to meet the need for varying income brackets and specific geographies in the city taking into the account the north/south disparity. Additionally, Equity has been identified as one of our guiding key values for all of the work we do in the Department. It is our belief that we can deliver a city built on equity so that everyone and every community benefits from change. Within Atlanta City Design, we recommend that investment policies and incentives should encourage a geographic, demographic, economic and cultural balance. The Department of City Planning, will work with One Atlanta, the Mayor's Office of Equity, Diversity and Inclusion, and other internal and external partners to address the unbalanced distribution of affordable housing.</p> <p><b><u>Responsible Person:</u></b> Completion of the report will be the responsibility of the Department of City Planning, Office of Housing and Community Development. Implementation will include the various housing agencies, non-profit and for-profit developers and policy makers for regulatory reform. Valerie Bernardo and Rodney Milton will be responsible for completing this action, under the leadership and guidance of Commissioner Tim Keane.</p>		
Rec. 2	We recommend that the Commissioner of the Department of City Planning work with city leaders and stakeholders to target areas with positive quality of life factors such as public transportation, access to education, and proximity to job centers when subsidizing affordable housing developments.	Agree
<b><u>Proposed Action:</u></b> Quality of Life Preference Points		



<b><u>Implementation Timeframe:</u></b>	<p>By the end of the 2018, the Department of City Planning will ensure that all funding sources for affordable housing development implemented by the City of Atlanta, Invest Atlanta and Housing Authority include preference points for affordable housing projects near positive quality of life factors as well as for those affordable housing projects that restore distressed properties and improve housing quality.</p> <p>The Department of City Planning will continue to provide preference points to projects that are in proximity to positive quality of life conditions, similar to those already included in our HOME MF Loan Program and recommended by HUD. Additionally, the Department of City Planning will also continue to implement a balanced approach to affordable housing by providing preference points for redevelopment projects that restore distressed properties and improve the conditions of the housing stock serving low income residents. This balanced approach to investing in areas of opportunity and areas in need of redevelopment is in alignment with the HUD's guidance to affirmatively furthering fair housing as well as Atlanta City Design's value of creating investment and policies that lead equitable development across the City.</p>	
<b><u>Comments:</u></b>		
<b><u>Responsible Person:</u></b>	Valerie Bernardo and Lolita Collins will be responsible for completing this action, under the leadership and guidance of Commissioner Tim Keane.	
<b>Rec. 3</b>	<p>We recommend that the Commissioner of the Department of City Planning work with city leaders and stakeholders to consolidate key information related to available housing programs and make that information more readily available to citizens and developers.</p>	<p>Agree</p>
<b><u>Proposed Action:</u></b>	<p>Consolidating Communication of Affordable Housing Programs</p> <p>By the end of fiscal year 2019, the Department of City Planning will have 1) developed a Housing Resource Guide for local residents, outlining the various housing programs and housing partners working with the City, to be updated annually; 2) Collaborated with the other City Housing Agencies to ensure links to each other's websites for information on affordable housing projects, resources and initiatives can be easily accessed by citizens and developers; and 3) Re-institute Developer Day at the City, where developers can come down and hear presentations on various housing development topics (i.e. financial resources, zoning policy changes, affordable housing compliance, inclusionary zoning, etc.) and live stream the presentations for those to view online.</p>	
<b><u>Implementation Timeframe:</u></b>		
<b><u>Comments:</u></b>	<p>The Department of City Planning understands that a coordinated approach to educating citizens and developers on the various affordable housing programs, initiatives and policies the City has is critical to effectively bolster community revitalization and offer new opportunities for those we serve. Each City housing agency currently communicates their housing programs to the public independently, which can be confusing to the public. A consolidated approach to marketing the various housing programs will cut down on confusion of what resources are available and who to contact for each program and financing source.</p>	

**Responsible Person:**

The Department of City Planning, Office of Housing and Community Development will be responsible for establishing an effective working partnership with the other City Housing Agencies to implement this coordinated communication plan. Valerie Bernardo and Lolita Collins will be responsible for completing this action, under the leadership and guidance of Commissioner Tim Keane.

Rec. 4

We recommend that the Commissioner of the Department of City Planning work with city leaders and stakeholders to consider longer affordability periods when subsidizing rental housing.

Agree

**Proposed Action:**

Create more restrictive affordability periods to extend subsidized rental housing

**Implementation  
Timeframe:**

By the end of calendar year 2018, the Department of City Planning will establish a working group of internal and external housing stakeholders to explore the feasibility of creating longer affordability periods on subsidized rental housing and to issue their findings and recommended actions to City Council by the end of calendar year 2019.

**Comments:**

Over the last year or so, much attention has been paid to finding a solution to expanding the affordability period of subsidized housing in Atlanta as the City is expected to lose thousands of expiring tax credit subsidized rental units by 2025. Georgia state law currently prohibits placing a restrictive covenant longer than 20 years on a property, unless the owner opts to have a longer restrictive period, which has limited the City and its partners from having affordability periods longer than 20 years.

**Responsible Person:**

The Department of City Planning, Office of Housing and Community Development will take the lead in coordinating a working group to examine to explore this issue. Valerie Bernardo and Rodney Milton will be responsible for completing this action, under the leadership and guidance of Commissioner Tim Keane.

Rec. 5

We recommend that the Commissioner of the Department of City Planning work with city leaders and stakeholders to develop a mechanism to maintain affordability when subsidizing for-purchase housing.

Agree

**Proposed Action:**

Creating mechanisms to maintain affordable housing when subsidizing for-purchase housing.

**Implementation  
Timeframe:**

By the end of the calendar year 2018, the Department of City Planning will establish a working group of internal and external housing stakeholders to explore the feasibility of creating mechanisms to maintain affordability when



subsidizing for-purchase housing, and to issue their findings and recommended actions to City Council by the end of calendar year 2018.

**Comments:** Affordability periods on subsidized for-purchase homes is generally between 5-10 years in Atlanta. One option that can be explored is extending the affordability period of our federally subsidized homebuyer assistance programs, beyond what is required by HUD, to 15-20 years. The Department of City Planning understands that in a dynamic market, the ability for low income households to capitalize on the equity in their homes within a short period of time has become challenging as those affordable homeownership units are permanently lost and the low-income household may not be able to find another affordable housing unit within the City, even with the net proceeds gained. The U.S. Housing and Urban Development (HUD) agency currently allows localities to select either a recapture method or resale method as a mechanism to maintain affordability for subsidized for-purchase housing. The Recapture method, which is what is used in Atlanta, requires homebuyers to repay all or a portion of the subsidy received if they sell their home during the affordability period. The Resale method requires homebuyers to sell their homes to another income eligible household during the affordability period. The Recapture method is the most commonly utilized method as it is easier for homeowners and the real estate community to understand and vastly less onerous for jurisdictions to implement and maintain compliance. An equity share model is an approach that can also be utilized within a Recapture Model which allows a portion of the equity generated in the home to be recaptured along with the subsidized funds. By employing an Equity Share model additional funds would be realized by the jurisdiction when homeowners sell their homes during the affordability period, which can then be rolled into providing additional homebuyer assistance.

**Responsible Person:** The Department of City Planning, Office of Housing and Community Development will take the lead in coordinating a working group to examine to explore this issue. Valerie Bernardo and Rodney Milton will be responsible for completing this action, under the leadership and guidance of Commissioner Tim Keane.

Rec. 6	We recommend that the Commissioner of the Department of City Planning work with city leaders and stakeholders to expand the use of programs such as providing density bonuses to developers and increasing the use of community land trusts.	Partially Agree
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**Proposed Action:** Explore the use of Homeownership Inclusionary Zoning and expand the housing types allowed under current Zoning regulations

**Implementation Timeframe:** By the end of fiscal year 2018, the Department of City Planning will begin working with internal and external stakeholders to explore the feasibility of adopting an Homeownership Inclusionary Zoning policy and will present their policy recommendations and finding to City Council within three years.

Additionally, the Department of City Planning will continue to engage the public on proposed zoning changes to expand the housing types within our zoning districts and will seek support for these zoning changes within two years.

**Comments:** The zoning regulations in the City of Atlanta currently provide more density that is currently being utilized by developers, making the option of providing density bonuses an ineffective tool in Atlanta. Community Land Trusts have been tried in the Atlanta market and have proven to be unsuccessful in the past, due to the lack of units brought to scale as well as the homebuyers, lenders and real estate agents not understanding the dynamics of Community Land Trusts and therefore not interested in purchasing or investing in homes apart of a Community Land Trust framework. With increased coordination and the development of a Homeownership Inclusionary Zoning policy, the Community Land Trust model could become a more utilized tool to produce long term affordability. Within Atlanta City Design we identify housing innovation, such as the initiatives identified as working towards our value of Progress.

**Responsible Person:** The Department of City Planning, Office of Housing and Community Development is responsible for coordinating the working group to explore the feasibility of a Homeownership Inclusionary Zoning policy. The Department of City Planning, Office of Zoning and Development is responsible for the zoning rewrite. Valerie Bernardo, Rodney Milton and Keyetta Holmes will be responsible for completing this action, under the leadership and guidance of Commissioner Tim Keane.

## Appendix B: District Demographic Profiles and Quality of Life Measures

City Council District	% Earned Bachelor's Degree	% Earned Graduate Degree	Population	% Black	% White	% Annual Income Under \$15,000	% Annual Income Over \$200,000	Households Paying over 50% of Annual Income in Rent
<b>*Citywide Average</b>	<b>28%</b>	<b>22%</b>	<b>Over 467,000</b>	<b>53%</b>	<b>38%</b>	<b>18%</b>	<b>9%</b>	<b>26%</b>
<b>1</b>	19%	14%	Over 36,000	64%	29%	25%	5%	31%
<b>2</b>	36%	33%	Over 42,000	28%	60%	13%	10%	17%
<b>3</b>	24%	16%	Over 41,000	57%	25%	26%	3%	31%
<b>4</b>	15%	10%	Over 36,000	85%	9%	30%	2%	34%
<b>5</b>	30%	24%	Over 38,000	49%	44%	16%	6%	25%
<b>6</b>	39%	36%	Over 40,000	13%	72%	9%	15%	17%
<b>7</b>	46%	31%	Over 42,000	12%	75%	8%	18%	20%
<b>8</b>	42%	38%	Over 40,000	8%	84%	6%	27%	15%
<b>9</b>	27%	21%	Over 38,000	60%	30%	22%	7%	27%
<b>10</b>	13%	9%	Over 35,000	93%	2%	27%	1%	34%
<b>11</b>	17%	13%	Over 40,000	96%	2%	19%	3%	34%
<b>12</b>	10%	5%	Over 34,000	88%	6%	34%	1%	36%

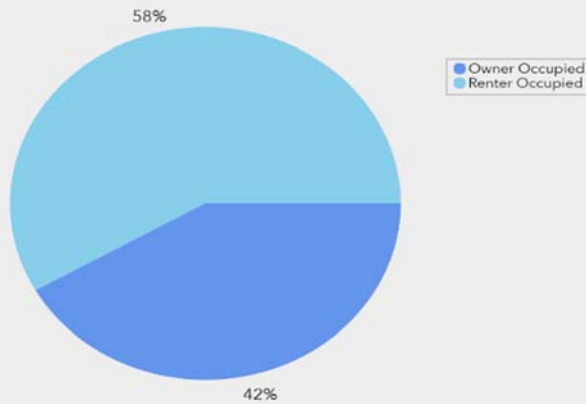
 = Below Citywide Average

 = Above Citywide Average

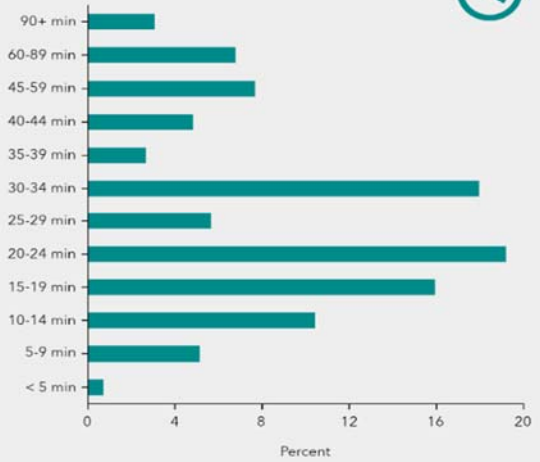
- The table above summarizes demographic statistics in each of the district profiles within the appendix. The purple boxes indicate percentages below the citywide average, while the boxes in blue indicate percentages above the citywide average. Individual City Council district profiles follow.
- The district profiles indicate that there is a relationship between race, educational attainment, annual income and households who pay over 50% of their income on rent. The profiles indicate a need for more affordable housing in Council Districts 2,5,6,7 and 8.
- All City Council districts with a percentage of white residents above the citywide average (districts 2,5,6,7,8) are below the citywide average in percentage of households who pay over 50% of their income on rent, and percentage of households with annual incomes under \$15,000. City Council districts with a percentage of black residents above the citywide average (Council Districts 1,3,4,9,10,11,12) are above the citywide average in percentage of households who pay over 50% of their annual income in rent, as well as percentage of households with annual income under \$15,000.
- All City Council districts with a percentage of white residents above the citywide average (districts 2,5,6,7,8) are above the citywide average in percent of bachelor's and graduate degrees earned; districts with a percentage of black residents above the citywide average (Council Districts 1,3,4,9,10,11,12) are below the citywide average in percent of bachelor's and graduate degrees earned.

## DISTRICT 1

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



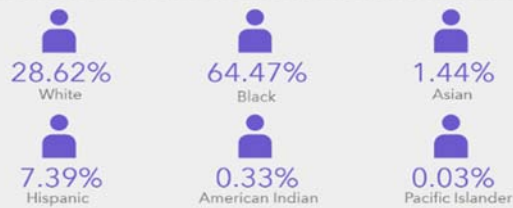
Educational Attainment



Rent Above 30% of Household Income



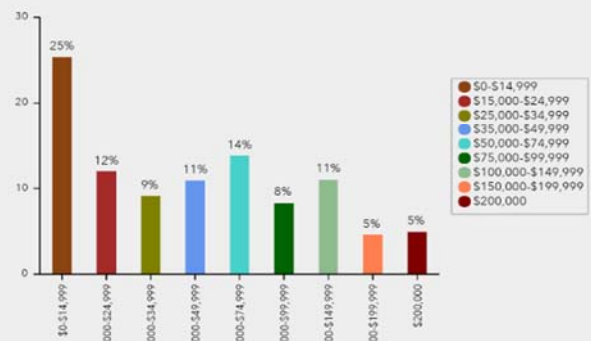
Race



Household Statistics



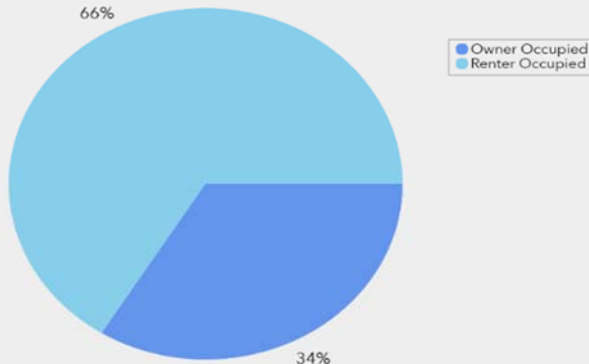
Household Income Levels



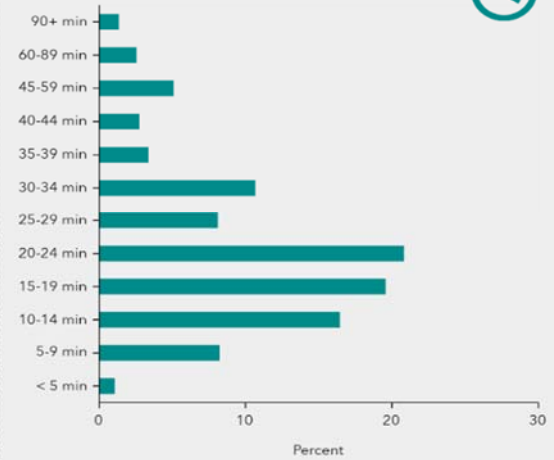


## DISTRICT 2

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



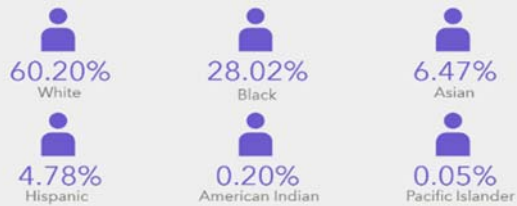
Educational Attainment



Rent Above 30% of Household Income



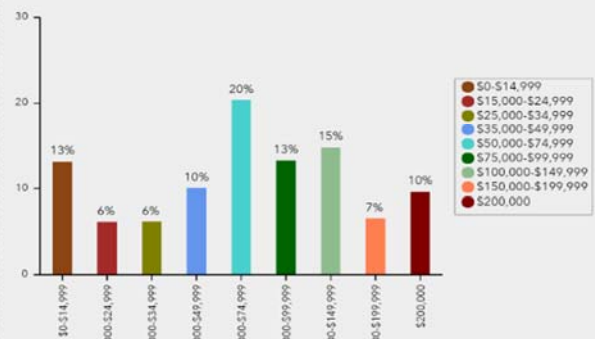
Race



Household Statistics

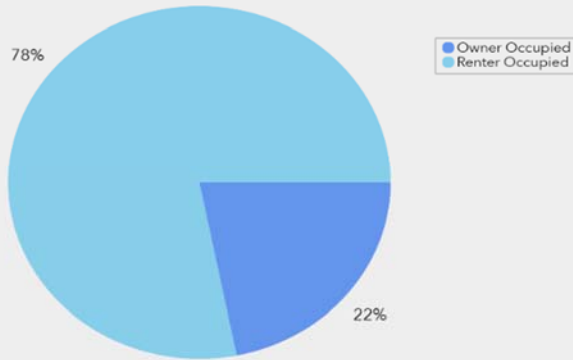


Household Income Levels

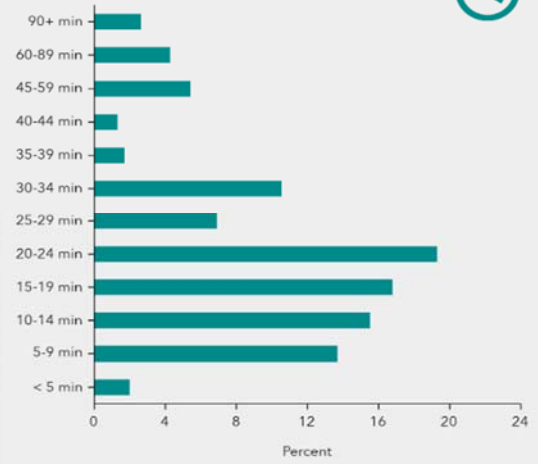


## DISTRICT 3

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



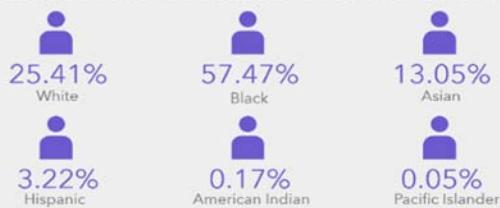
Educational Attainment



Rent Above 30% of Household Income



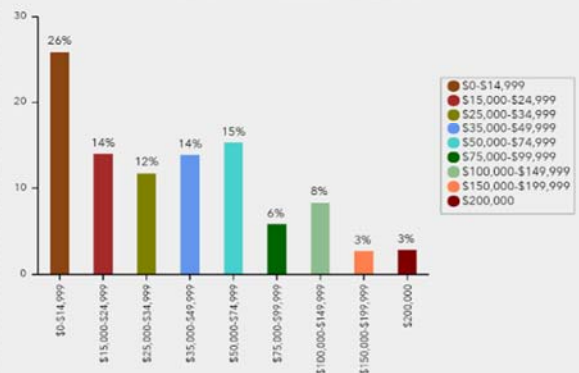
Race



Household Statistics

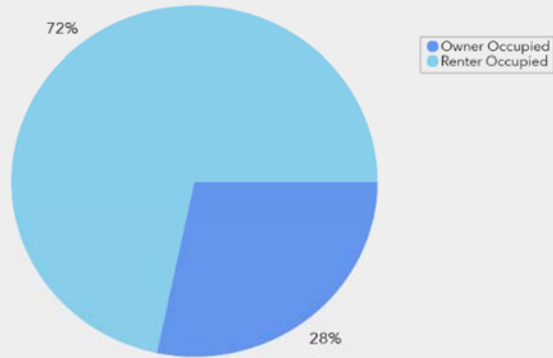


Household Income Levels

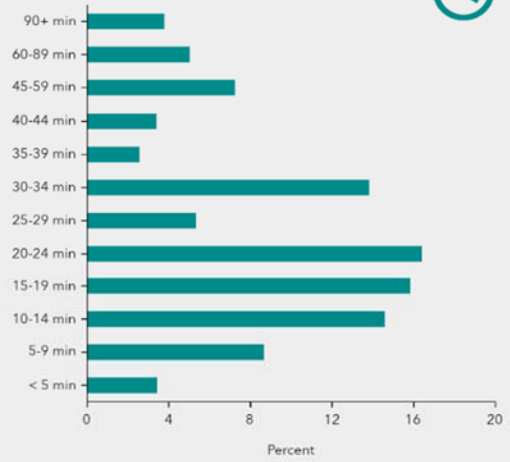


## DISTRICT 4

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



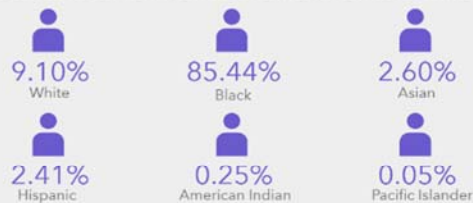
Educational Attainment



Rent Above 30% of Household Income



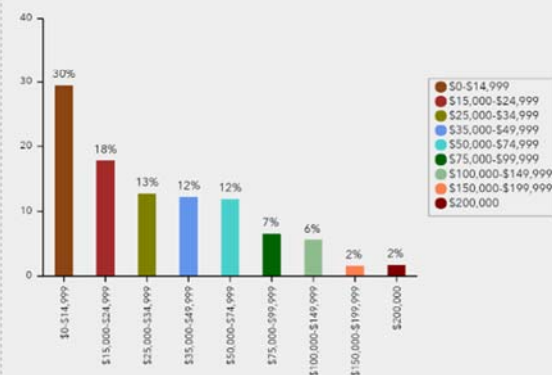
Race



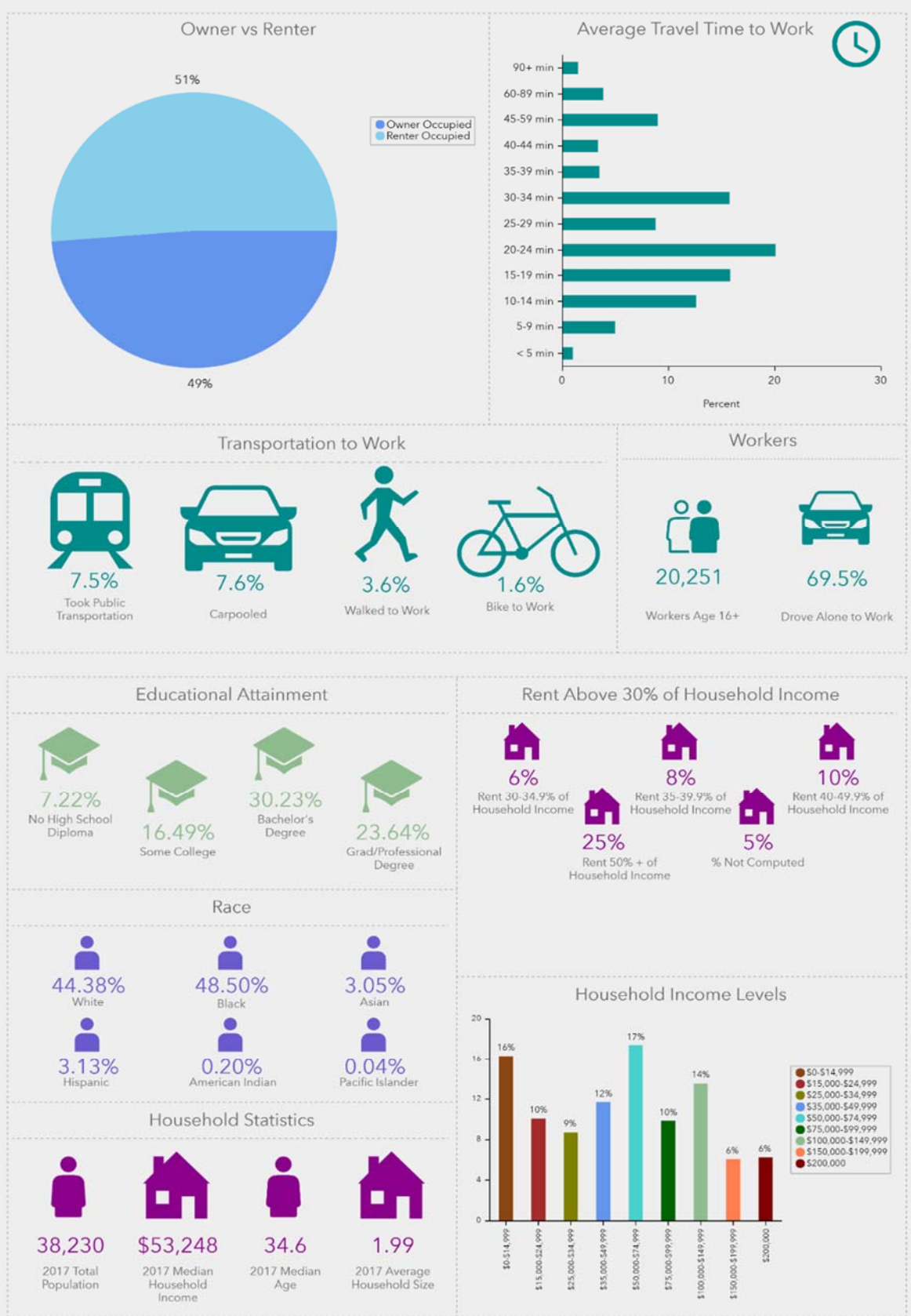
Household Statistics



Household Income Levels



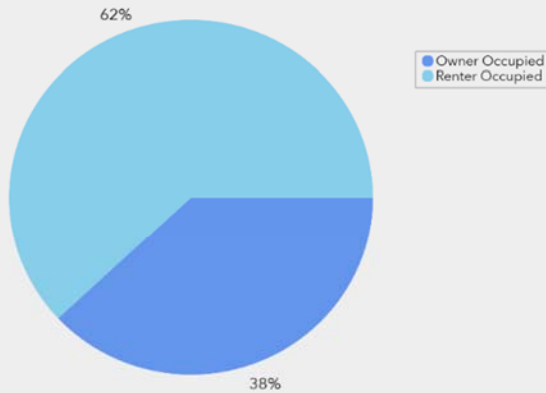
## DISTRICT 5



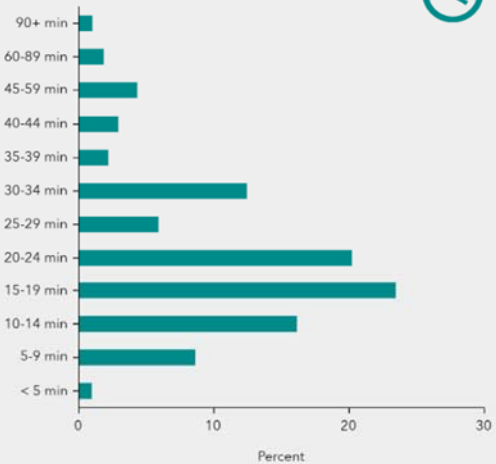


## DISTRICT 6

Owner vs Renter



Average Travel Time to Work



Transportation to Work



5.9%  
Took Public  
Transportation



3.8%  
Carpooled



3.7%  
Walked to Work



0.9%  
Bike to Work

Workers



24,363  
Workers Age 16+



76.3%  
Drove Alone to Work

Educational Attainment



3.31%  
No High School  
Diploma



9.64%  
Some College



38.61%  
Bachelor's  
Degree



35.83%  
Grad/Professional  
Degree

Rent Above 30% of Household Income



8%  
Rent 30-34.9% of  
Household Income



5%  
Rent 35-39.9% of  
Household Income



6%  
Rent 40-49.9% of  
Household Income



17%  
Rent 50%+ of  
Household Income



5%  
% Not Computed

Race



72.46%  
White



13.39%  
Black



5.15%  
Asian



11.61%  
Hispanic



0.33%  
American Indian



0.04%  
Pacific Islander

Household Statistics



40,424  
2017 Total  
Population



\$76,764  
2017 Median  
Household  
Income

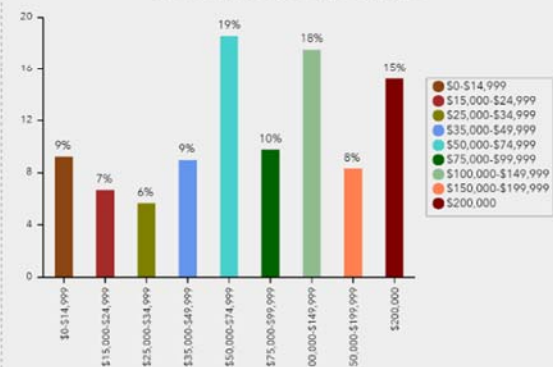


35.2  
2017 Median  
Age



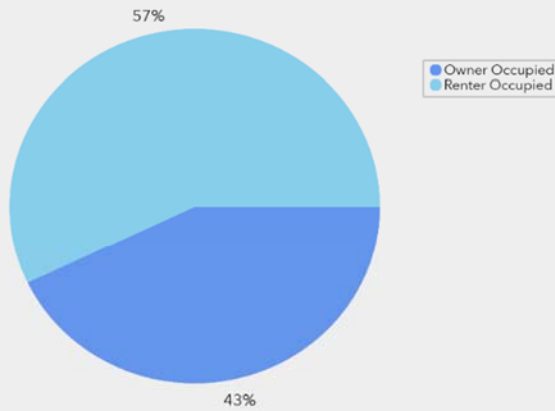
1.91  
2017 Average  
Household Size

Household Income Levels

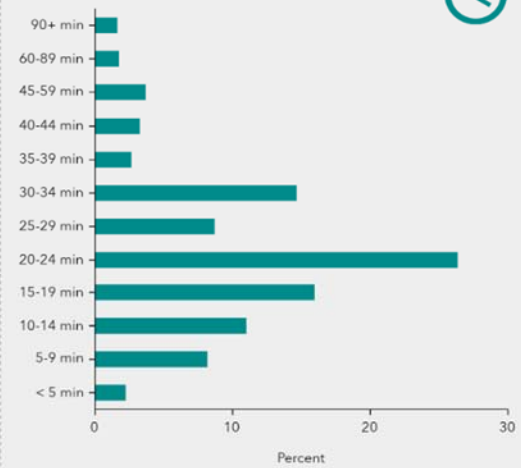


## DISTRICT 7

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



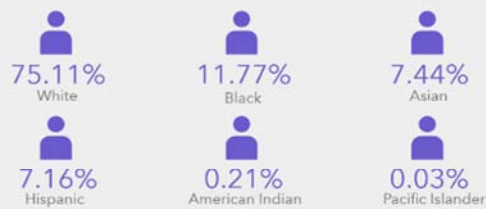
Educational Attainment



Rent Above 30% of Household Income



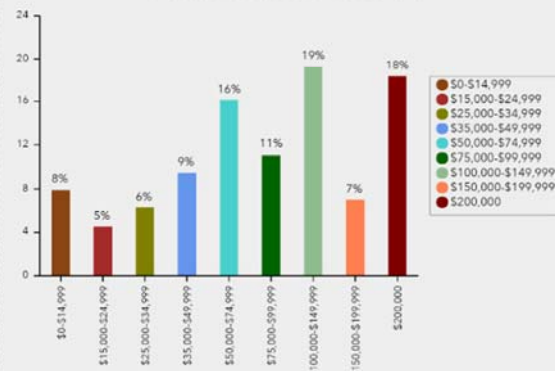
Race



Household Statistics

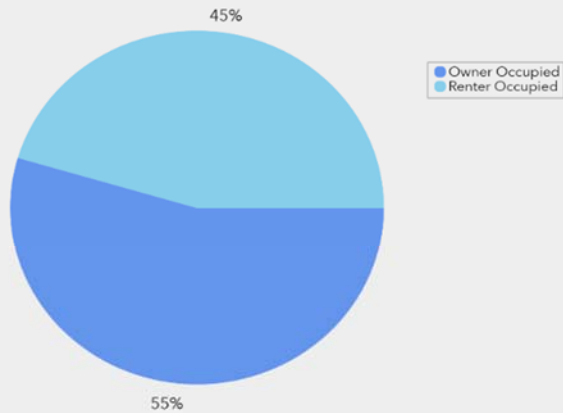


Household Income Levels

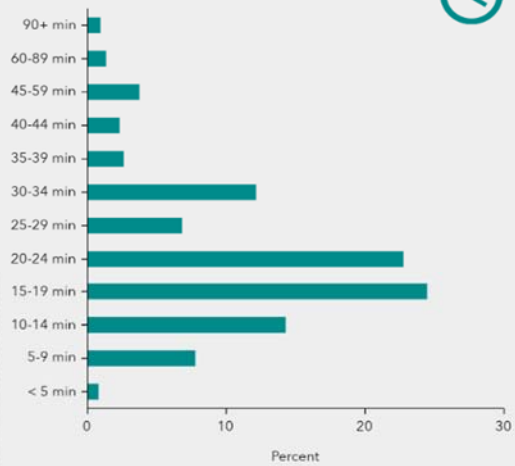


## DISTRICT 8

Owner vs Renter



Average Travel Time to Work



Transportation to Work



1.5%  
Took Public  
Transportation



4.7%  
Carpooled



0.9%  
Walked to Work



0.1%  
Bike to Work

Workers



18,277  
Workers Age 16+



83.9%  
Drove Alone to Work

Educational Attainment



0.98%  
No High School  
Diploma



9.76%  
Some College



41.87%  
Bachelor's  
Degree



38.12%  
Grad/Professional  
Degree

Rent Above 30% of Household Income



5%  
Rent 30-34.9% of  
Household Income



9%  
Rent 35-39.9% of  
Household Income



8%  
Rent 40-49.9% of  
Household Income



15%  
Rent 50%+ of  
Household Income



4%  
% Not Computed

Race



84.32%  
White



7.68%  
Black



5.23%  
Asian



3.24%  
Hispanic



0.10%  
American Indian



0.06%  
Pacific Islander

Household Statistics



40,540  
2017 Total  
Population



\$104,740  
2017 Median  
Household  
Income

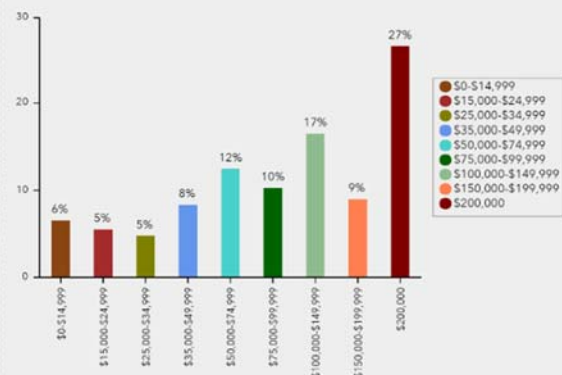


40.8  
2017 Median  
Age



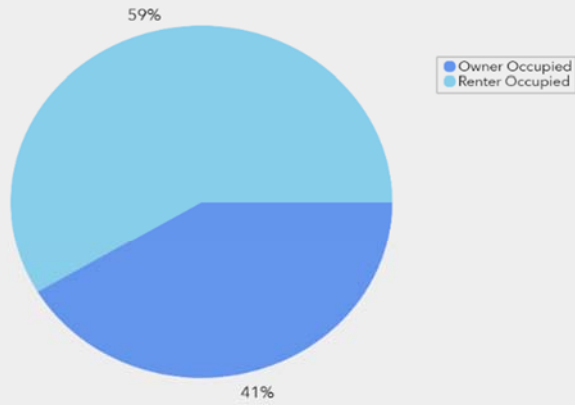
2.06  
2017 Average  
Household Size

Household Income Levels

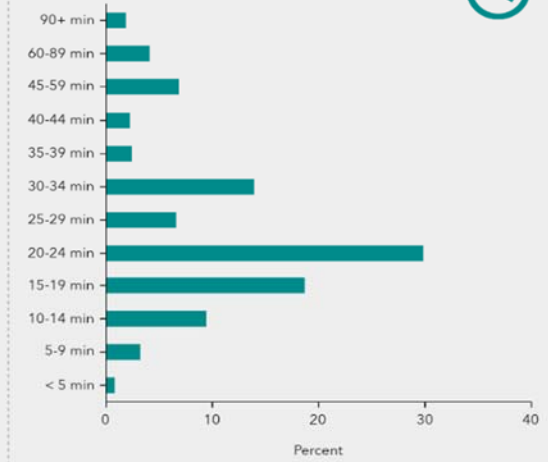


## DISTRICT 9

Owner vs Renter



Average Travel Time to Work



Transportation to Work



7.5%  
Took Public Transportation



10.6%  
Carpooled



1.2%  
Walked to Work



0.6%  
Bike to Work

Workers



16,404  
Workers Age 16+



72.1%  
Drove Alone to Work

Educational Attainment



6.63%  
No High School Diploma



18.11%  
Some College



27.38%  
Bachelor's Degree



20.89%  
Grad/Professional Degree

Rent Above 30% of Household Income



12%  
Rent 30-34.9% of Household Income



6%  
Rent 35-39.9% of Household Income



10%  
Rent 40-49.9% of Household Income



27%  
Rent 50%+ of Household Income



6%  
% Not Computed

Race



30.15%  
White



59.83%  
Black



3.14%  
Asian



7.62%  
Hispanic



0.15%  
American Indian



0.05%  
Pacific Islander

Household Statistics



38,419  
2017 Total Population



\$40,014  
2017 Median Household Income

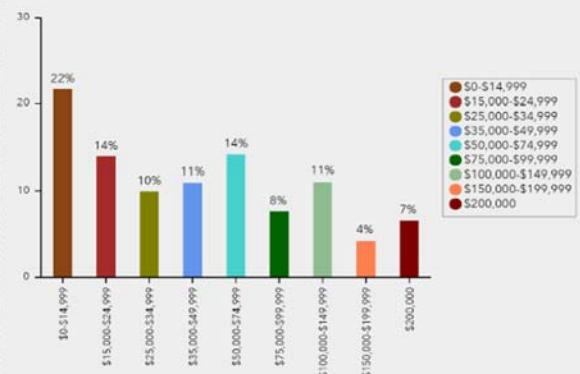


33.4  
2017 Median Age



2.31  
2017 Average Household Size

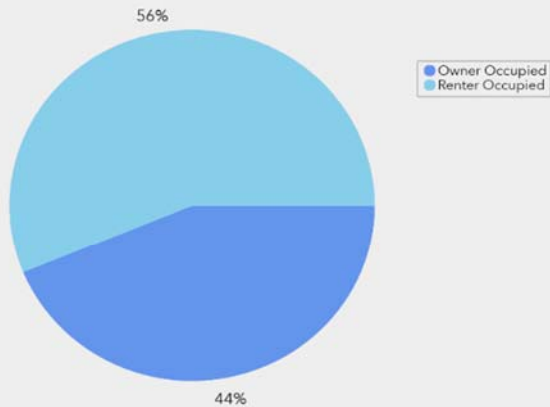
Household Income Levels



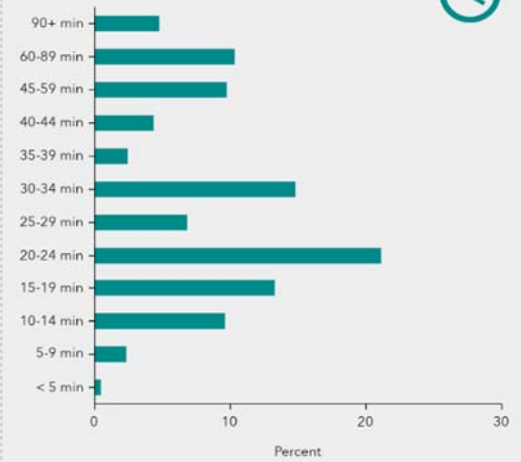


## DISTRICT 10

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



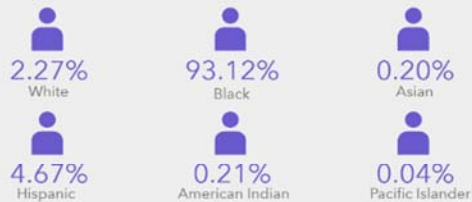
Educational Attainment



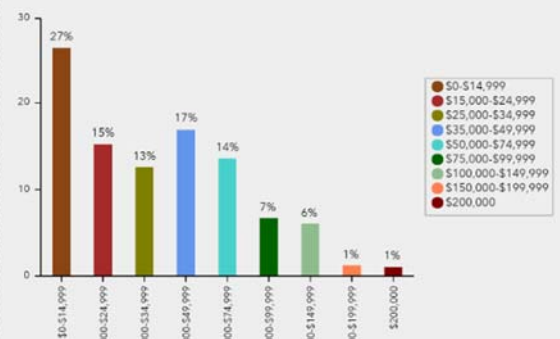
Rent Above 30% of Household Income



Race



Household Income Levels

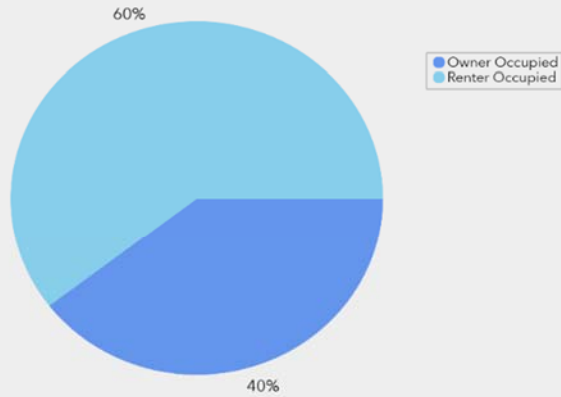


Household Statistics

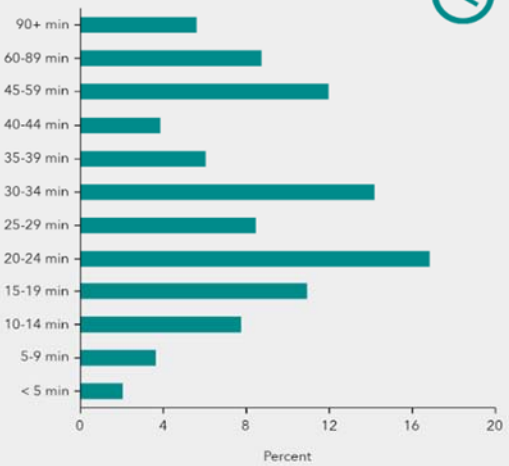


## DISTRICT 11

Owner vs Renter



Average Travel Time to Work



Transportation to Work



Workers



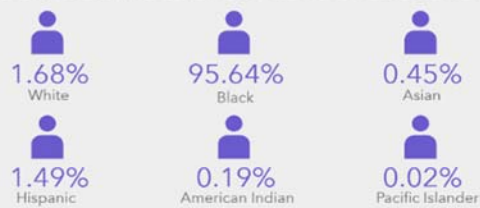
Educational Attainment



Rent Above 30% of Household Income



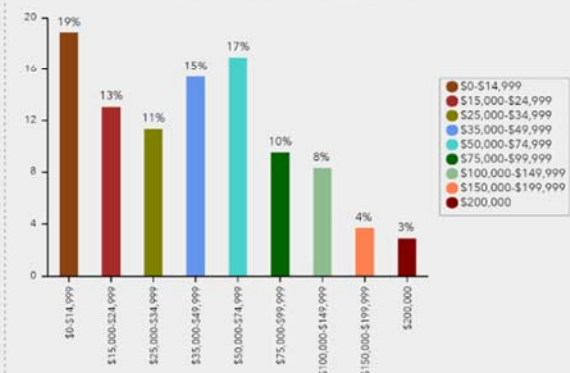
Race



Household Statistics

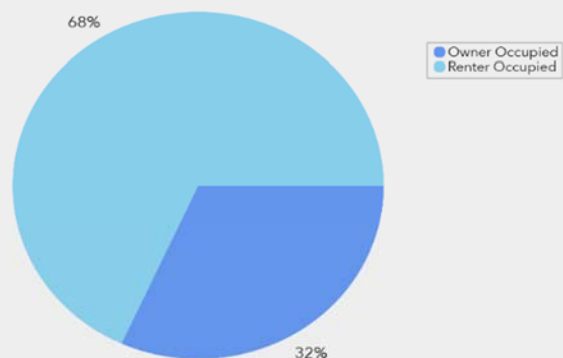


Household Income Levels

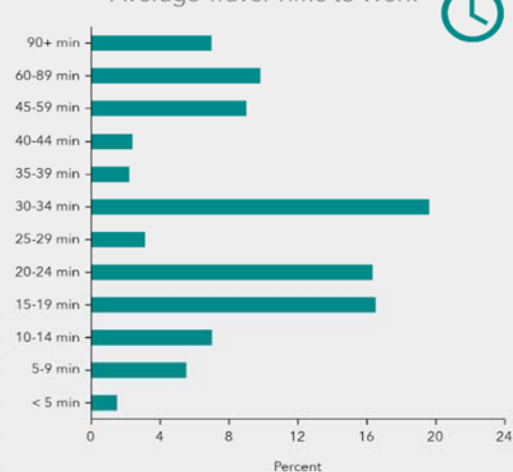


## DISTRICT 12:

### Owner vs Renter



### Average Travel Time to Work



### Transportation to Work



### Workers



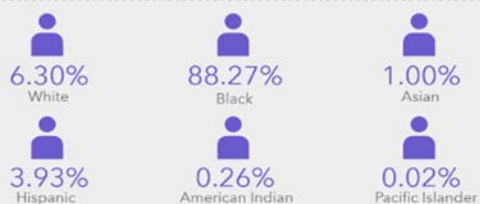
### Educational Attainment



### Rent Above 30% of Household Income



### Race



### Household Statistics



### Household Income Levels

