



**Gwinnett**

## **Analysis of Impediments to Fair Housing Choice**

Prepared for  
Submission to the  
U.S. Department of Housing  
and Urban Development

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**BOC APPROVAL:**

**PENDING**

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## Executive Summary

Equal access to housing choice is a cornerstone principle of America's commitment to equality and opportunity for all. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination based on familial status and disability. The U.S. Department of Housing and Urban Development (HUD), and specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Georgia Fair Housing Act, protects individual's right to compete for housing within their economic means of a fair and equitable basis. It prohibits discrimination in housing and housing-related activities because of disability, race, sex, color, national origin, religion, or familial status.

Through the analysis process, local communities promote fair housing choices for all persons, to include Protected Classes, as well as provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. By analyzing and taking actions to address any identified impediments, Gwinnett County will confirm for HUD that it is meeting its obligations and certifications to affirmatively further fair housing.

### Why Assess Fair Housing?

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

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: The Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, including Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG, now known as Emergency Solutions Grant), and Housing Opportunities for Persons with AIDS



(HOPWA), as well as additional program components that have been enacted such as the Neighborhood Stabilization Program (NSP) and the Housing Trust Fund.

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

- Conduct an Analysis of Impediments to Fair Housing Choice (AI);
- Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken.

HUD interprets these three certifying elements to entail:

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

### **Assessment of Fair Housing vs. Analysis of Impediments to Fair Housing Choice**

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

### **Background**

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

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

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

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

### **Demographic Overview**

This section presents demographic information collected from the Census Bureau, the Bureau of Economic Analysis, and other sources. Data was used to analyze a broad range of socioeconomic characteristics, including population growth, employment, poverty, and health care access and status. As a part of this analysis, we examined the population growth Gwinnett County has experienced contrasted with the State of Georgia and the Atlanta-Sandy Springs-Roswell Metropolitan Statistical Area (MSA), which includes Gwinnett County.

By 2010, the population in Gwinnett County accounted for 15.2% of the MSA and 8.3% of Georgia. According to the 2013- 2017 ACS data, Gwinnett County had an estimated population of 889,954, making it the second largest county in Georgia. Both Georgia and the Atlanta-Sandy Springs-Roswell MSA experienced growth over the same period; however, neither the state nor MSA experienced growth equal to Gwinnett County's. These growth rates are among the highest in the MSA and are the driving force behind why Gwinnett County has grown in a manner that has been heavily focused on residential development.

### **Protected Class Analysis**

The Fair Housing Act and similar state fair housing laws list seven protected classes for housing discrimination: race, color, national origin, gender, familial status, disability, and religion. This protected class analysis addresses each of the federally protected population groups and their geographic distribution in Gwinnett County, Georgia.

According to the 2013-2017 ACS Demographic and Housing Estimates, Gwinnett County had an estimated population of 889,954, up by 14.38% since the 2006-2010 ACS data release. Based on the 2013 - 2017 ACS data, only 39.26% of the population was comprised of non-Latino whites while the minority groups (Black (25.94%), Hispanic (20.75%), and Asian (11.20%)) represent most Gwinnett's population.

### Segregation Analysis

Segregation, or the degree to which two or more racial or ethnic groups live geographically separate from one another, can directly affect the quality of life in cities and neighborhoods. A study by the Federal Reserve Bank of Cleveland compared the economic growth of more than 100 areas in the U.S. between 1994 and 2004 and concluded that racial diversity and inclusion was "positively associated with a host of economic growth measures, including employment, output, productivity, and per capita income."<sup>1</sup> In general, diverse communities benefit from greater innovation arising out of the varied perspectives within the community. Additionally, multilingual and multicultural regions are positioned for success in the global marketplace. In contrast, "persistent economic and racial residential segregation is implicated in enduring racial and ethnic inequality."<sup>2</sup>

Segregation Analysis is used to determine the degree to which residents in Gwinnett County are segregated by race and ethnicity. Segregation is measured by three categories: Dissimilarity Index, Exposure Index and Isolation Index. The primary data sources that were used for this analysis is the U.S. Census Bureau, Census Scope and US2010.

One important question remains – whether the overall racial and ethnic segregation in Gwinnett County has worsened, improved, or remained about the same since 2010. The four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation used in this analysis allow for a possible consensus answer.

This Segregation Analysis has shown that, on the whole, segregation between White, Black, Asian, and Hispanic residents in Gwinnett County are relatively low and continue to decrease as the minority population of Gwinnett County continues to grow.

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<sup>1</sup> PolicyLink. 2011. "America's Tomorrow: Equity is the Superior Growth Model." [http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406da6d5eca3bbf35af0%7D/SUMMIT\\_FRAMING\\_WEB\\_FINAL\\_20120127.PDF](http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406da6d5eca3bbf35af0%7D/SUMMIT_FRAMING_WEB_FINAL_20120127.PDF) Page | 43

<sup>2</sup> Bruch, E. 2005. "Residential Mobility, Income, Inequality, and Race/Ethnic Segregation in Los Angeles." Princeton, NJ: Princeton, University, pp. 1

## Housing Profile

Affordability is a significant factor for Gwinnett County residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30% of a family's monthly gross income. Households that spend over that threshold may be significantly cost burdened and have difficulty affording necessities. Yet, according to HUD, more than 12 million renters and homeowners nationally spend more than 50% of their income on housing and a family with one full-time worker earning the minimum wage cannot afford the local fair-market rent for a two-bedroom apartment anywhere in the United States. HUD's definition of "affordable housing" includes housing-related expenses such as rent and utilities.

On an annual basis, HUD calculates median family income for metropolitan statistical areas (MSAs) across the country, including the Atlanta-Sandy Springs-Marietta MSA, which includes Gwinnett County. The categories include extremely low-income (earning less than 30% of the MFI), very low-income (earning between 30% and 50% of the MFI), and low-income (earning between 50% and 80% of the MFI). The U.S. Census Bureau prepared a special tabulation of Median Family Income (MFI) estimates from the 2012-2016 5-year ACS. HUD uses this data as the basis for calculating FY2019 MFIs. According to HUD's calculation, the 2019 MFI for the greater metropolitan area is \$79,700.00. According to the 2013 – 2017 ACS 5 Year Estimate, the MFI for households in Gwinnett County is \$72,804.00 making Gwinnett County's MFI 8% lower than the FY 2019 MFI for the MSA. This poses a challenge when families are seeking affordable housing.

Housing needs change over time as the size, composition of the population evolves, and housing preferences shift. Different social and economic factors may influence whether families choose to rent or buy, construct new homes or renovate old homes. Family size, householder age, and economic status influenced the size and type of homes needed. Household income and purchasing power can limit housing choices and the lack of affordable housing availability only further compounds the issue. This section of the Analysis will present a housing profile for Gwinnett County and will include various housing statistics related to single family and rental housing.

## Zoning Analysis

Comprehensive land use planning is an integral tool by which governments address the interconnection and complexity of their respective jurisdictions. Community decisions on land use can have a rippling affect and profound impact on affordable housing and fair housing choice for the entire community. Environmental hazards, noise elevation,

property value, and traffic are some of the effects of land use decisions that form the character of a community.

The bulk of Gwinnett County's zoning ordinances do not restrict fair housing choice - thus allowing individuals to live where and how they choose. These zoning codes allow individuals the same access to housing as everyone else. It should be noted that this analysis of Gwinnett County's zoning ordinances is highly generalized. Therefore, it is important to view the analysis as an overall sense of the zoning ordinances for the area but not to assume the scores correctly characterize the County's ordinances.

### **Access to Opportunity**

Access to housing is not only about having a roof over one's head; it also affects access to opportunity, including education and networking opportunities, and proximity to good jobs. Both diminishing regional fortunes and urban revitalization are the result of the new importance of skill-based jobs that provide a base for the expanding knowledge-based economy. These trends raise the questions of whether lower-skill; lower-wage households might be left out of access to opportunity because of increasing housing costs at the metropolitan level as well as at the local level.

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools and jobs. This section examines these dimensions geographically relative to locations of RCAP/ECAPs and evaluates levels of access to opportunity by race and ethnicity.

### **Housing Discrimination Complaints**

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

This section reviews complaints filed with Region IV of HUD's Office of Fair Housing and Equal Opportunity (FHEO), located in Atlanta, Georgia regarding alleged violations of the Fair Housing Act.

### **Fair Housing Enforcement, Outreach, & Resources**

The availability of educational resources for local residents is imperative when it comes to fair housing education at the local level. Accessibility to fair housing education,

outreach, and handout materials contribute to reducing violations and impediments within the community. Local nonprofit organizations and private institutions certified by HUD as housing counseling agencies often provide fair housing resources and services to the community. This section will examine the existing enforcement activities, outreach efforts, and resources available regarding fair housing rights and responsibilities.

### **Assessment of Past Goals**

Gwinnett County's last Analysis of Impediments to Fair Housing Choice (AI) was adopted in 2015. The 2015 AI identified six impediments to fair housing choice in Gwinnett County. Each impediment and associated recommendation(s) are discussed in this section along with a brief summary of the progress the County has made. Progress on goals was assessed through an examination of the County's Consolidated Annual Performance Evaluation Reports and discussion with Community Development Program staff.

### **Impediments & Suggested Actions**

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

This Analysis of Impediments to Fair Housing Choice for Gwinnett County revealed eight impediments to fair housing choice. The key issues identified are accompanied by suggested actions the County should implement in order to remediate these impediments. These actions were designed to offer greater housing choice for protected classes, who often experience discrimination in the housing market. In this section, the impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment.

## Definitions

**Affirmatively Further Fair Housing** - As defined in HUD's *AFFH Rule Guidebook*, the definition of "Affirmatively Further Fair Housing" (AFFH) means:<sup>3</sup> taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

**Affordable Housing** - HUD defines "affordable housing" as housing for which the occupant(s) is/are paying no more than 30 percent of his or her income for gross housing costs, including utilities. Please note that some jurisdictions may define affordable housing based on other, locally determined criteria, and that this definition is intended solely as an approximate guideline or general rule of thumb.

**Certification** - As described in the *Fair Housing Planning Guide*, the Comprehensive Housing Affordability Strategy (CHAS) statute at Section 104(21) defines the term "certification" within the context of the Certification to Affirmatively Further Fair Housing (AFFH) to be:<sup>4</sup>

- A written assertion
- Based on supporting evidence
- Available for inspection by the Secretary, the Inspector General and the public
- Deemed accurate for purposes of this Act unless the Secretary determines otherwise after:
  - Inspecting the evidence
  - Providing due notice and opportunity for comment.

**Fair Housing Choice** - In carrying out its Analysis of Impediments to Fair Housing Choice, Gwinnett County utilized the following definition of "Fair Housing Choice":

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or disability.

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<sup>3</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *AFFH Rule Guidebook: Version 1 (Page 5)*. December 2015.

<sup>4</sup> Ibid. Page 1-4.

**Impediments to Fair Housing Choice** - As described in the *Fair Housing Planning Guide*, impediments to fair housing choice include:<sup>5</sup>

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

**Protected Classes** - Demographic categories of persons established by civil rights statutes against whom discrimination is prohibited. (See also Prohibited Bases.)

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

## Data Sources Used in this Analysis

**Decennial Census Data** – Data collected by the Decennial Census for 2010, 2000, and 1990 is used in this Analysis (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 Census Summary File 1 (SF 1) – This dataset contains what is known as “100 percent data”, meaning that it contains the data collected from every household that participated in the 2010 Census and is not based on a representative sample of the population. Though this dataset is broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block level.

**American Community Survey (ACS)** – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10

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<sup>5</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.



years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS 1-Year Estimates – Based on data collected between January and December of the same calendar year, these single-year estimates represent the most current information available from the U.S. Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS Multi-Year Estimates – More current than Decennial Census data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater.

**Federal Financial Institutions Examining Council (FFIEC)** – The FFIEC collects and publishes certain data used in connection with federal reporting responsibilities under the Home Mortgage Disclosure Act and the Community Reinvestment Act.

- FFIEC 2018 Census Reports – All FFIEC Census Reports from 2003-2011 are based upon Census 2000 data while the 2018 FFIEC's Census Reports are based on Census 2010 data.
- Home Mortgage Disclosure Act (HMDA) Data – Financial institutions subject to the HMDA (including banks, credit unions, and other mortgage lenders) must annually submit certain mortgage loan data to the FFIEC. The FFIEC aggregates and publishes the data. The most current HMDA data used in this Analysis is based on loan records from the 2018 calendar year.

## Research Methodology

The 2020 Gwinnett County Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market. This document also examines information pertaining to affirmatively furthering fair housing, the state of the

fair housing delivery system and housing transactions affecting people throughout the County. This information was collected and evaluated through four general approaches:

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

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

## **Limitations of this Analysis**

This Analysis of Impediments to Fair Housing Choice report seeks to analyze the current fair housing climate in the County, identify impediments to fair housing choice, and set forth recommended strategies for overcoming the identified impediments. Some of the impediments identified in this report will require additional research and on-going analysis by entities within the County.

HUD’s primary guidance for developing Analyses of Impediments is found in the Fair Housing Planning Guide, originally published in 1996. Since that time, HUD’s approach to fair housing has evolved and guidance has yet to catch up. In 2015, HUD released a new proposed rule titled “Affirmatively Furthering Fair Housing” that outlines significant changes to the development of local fair housing studies. The purpose of this rule was to refine the prior analysis of impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants’ planning process and assist them in fulfilling the statutory obligation. However, on Friday, January 5, 2018, HUD is extended the deadline for submission of an Assessment of Fair Housing (AFH) by local government consolidated plan program participants to their next AFH submission

date that falls after October 31, 2020 effectively requiring jurisdictions to rely on the former Fair Housing Planning Guide.

To maintain project deadlines, this AI uses the *Fair Housing Planning Guide* as an underpinning resource complimented where possible with elements of the proposed rule and knowledge of HUD's more recent expectations relative to the completion of the AI.

Throughout this analysis, careful decisions were made regarding which datasets to use. The choice of a dataset often involves tradeoffs between criteria. For example, more recent datasets often have a limited number of data variables available for analysis. Additionally, there is the unavoidable tradeoff between geographic and socio-economic detail (less detailed data for smaller geographies) that sometimes restricts the availability of data. Also, the detailed definitions of data variables can change over time limiting their comparability.

Substantial portions of this analysis rely upon Census data reported at the census tract level. Census tracts do not follow municipal boundaries, meaning the tracts used may include both residents and non-residents. Erring on the side of inclusivity, this research considered data from all census tracts containing even a portion of the County. By this approach, every resident of the County is represented.

Finally, all source data used in the preparation of this analysis, whether from national sources (e.g. the U.S. Census Bureau), local sources (e.g. County Departments), or from proprietary sources (e.g. the National Low Income Housing Coalition) is assumed to be accurate.

## **Purpose of This Research**

The purpose of the 2020 Gwinnett County Analysis of Impediments to Fair Housing Choice is to research, analyze and identify potential impediments to fair housing choice and to suggest actions that the County may consider in working toward eliminating, overcoming or mitigating the identified impediments.

## **Stakeholder Engagement**

The Gwinnett Community Development Program implemented a robust outreach strategy to inform residents of the Affirmatively Furthering Fair Housing process and to reaffirm its commitment to community engagement and outreach. Gwinnett County sought to gather input from residents on housing an opportunity issues through various strategies to engage a range of community stakeholders and residents.

Community participation was received through three methods during the Analysis of Impediments process. Local organizations and members of the public provided input on Fair Housing through:

- Stakeholder Interviews
- Needs Assessment Meetings
- Surveys

**Stakeholder Interviews** - Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), Gwinnett County staff, fair housing advocates, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research conducted for this Analysis.

A series of stakeholder interviews were conducted with organizations that are active in housing, community development, fair housing and public service activities in the County. These interviews were held from April 19, 2019 through July 11, 2019. Stakeholders were identified by the Gwinnett Community Development Program staff and invited to participate in one-on-one interviews. The goal of these interviews was to go beyond the quantitative data to gain perspective on the community development challenges and impediments to fair housing from a wide range of non-profit developers and service providers. Stakeholders were asked about the community assets, challenges, and needs across the County. These leaders were then asked to provide their input of fair housing challenges identified in the most recent Analysis of Impediments and actions the county could potentially take to address impediments moving forward.

Led by Community Development staff, the needs assessment meetings sought input from residents throughout the county, including Spanish-speaking residents and residents with disabilities. Public housing residents were also encouraged to complete electronic and paper surveys to offer input. In an online or paper survey the respondent can only answer the questions asked by choosing from the answers offered. To get a deeper sense of the individual experiences of Gwinnett County residents, needs assessment meetings were conducted with the public. The input was robust and plentiful and provided a deep discussion of issues in the County.

**Stakeholder Surveys** - A survey was designed to collect information from community stakeholders. The survey was developed in both English and Spanish as there are members of the community who speak Spanish as their first language. The survey was primarily advertised online through email distribution lists to all local stakeholders, county staff, housing authority staff, and citizens to garner input on Fair Housing issues. Survey Monkey, an online survey repository hosted the survey.

Gwinnett County recognized that not every citizen has access to a computer at home and that citizens accessed computers at libraries and at neighborhood-based computer labs. To reach that population, the Gwinnett County developed flyers to advertise the survey and upcoming meetings. Additionally, the survey was also distributed onsite at the local health departments, the library, and other community centers in a paper format to engage those captive audiences.

The survey was designed to collect input from a broad spectrum of the community and received responses from Gwinnett County residents and non-residents. The survey consisted of 32 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 137 responses to this survey, though not every respondent answered every question. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the full 137 survey respondents. Surveys were received from April 19, 2019 through July 18, 2019. Paper surveys received were manually entered by the Survey Administrator into Survey Monkey for tabulation and analysis. To prevent “ballot stuffing,” the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

**Public Meetings** – Seven public meetings were held to provide a forum for Gwinnett County residents and other interested parties to contribute to this Analysis. These meetings were held at the following locations providing a variety of options for residents to attend and offer input:

- Gwinnett Justice & Administration Center in Lawrenceville, May 1, 2019, 10a.m. and 6 p.m.
- Annandale Village in Suwanee, July 1, 2019, 10:00 a.m.
- Snellville City Hall in Snellville, July 2, 2019, 10:00 a.m.
- Norcross Cultural Arts & Community Center in Norcross, July 9, 2019, 10:00 a.m.
- Collins Hill Library in Lawrenceville, July 10, 2019, 12:30 p.m.
- Five Forks Library in Lawrenceville, July 11, 2019, 10:30 a.m.

These meetings were advertised via flyers distributed by the Gwinnett Community Development Program using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

## Demographic Overview

This section presents demographic information collected from the Census Bureau, the Bureau of Economic Analysis, and other sources. Data was used to analyze a broad range of socioeconomic characteristics, including population growth, employment, poverty, and health care access and status. As a part of this analysis, we examined the population growth Gwinnett County has experienced contrasted with the State of Georgia and the Atlanta-Sandy Springs-Roswell Metropolitan Statistical Area (MSA), which includes Gwinnett County. The MSA includes 28 metro counties that stretch as far north as Dawson County, as far south as Merriweather County, runs along the Alabama border to the west, and expands just beyond Gwinnett County to the east, including both Barrow and Walton Counties.

Gwinnett County's land area covers 437 square miles and is one of the largest and the fastest growing counties in the state of Georgia. In 1990, Gwinnett County accounted for 11.1% of the MSA's population and 5.4% of Georgia's. By 2010, Gwinnett County accounted for 15.2% of the MSA and 8.3% of Georgia. According to the 2013- 2017 ACS data, Gwinnett County has an estimated population of 889,954, making it the second largest county in Georgia. Both Georgia and the Atlanta-Sandy Springs-Roswell MSA experienced growth over the same time-period; however, neither the state nor MSA experienced growth equal to Gwinnett County's. These growth rates are among the highest in the MSA and are the driving force behind why Gwinnett County has grown in a manner that has been heavily focused on residential development.

Over the years, the county has become a significant part of the booming Atlanta metropolitan area and has a diverse collection of historic sites. Gwinnett County is home to the Infinite Energy Center, the Gwinnett Stripers, and four Fortune 500 companies.

County	1990	2000	Difference 1990- 2000	% Change 1990- 2000	2010	Difference 2000- 2010	% Change 2000- 2010
Georgia	6,478,216	8,186,453	1,708,237	26.37%	9,687,653	1,501,200	18.34%
Gwinnett County	358,483	588,448	229,965	64.15%	805,321	216,873	36.86%
Atlanta-Sandy Springs-Marietta	3,069,425	4,247,981	1,178,556	38.40%	5,268,860	1,020,879	24.03%

Table 1: Population Change in Gwinnett County

## Population by Age

The median age in Gwinnett County is 34.9 years, which is considerably younger than the nationwide median age of 38.2 years and the State’s median age of 37.7 years. According to the 2013-2017 American Community Survey, approximately 63.47% of the Gwinnett County’s population is between the ages of 18 and 64; 27.66% are under 18, and 8.87% are over the age of 65. The distribution of age remained consistent for many age groups between 2010 and 2017. The number of senior residents ages 65 and over has increased steadily; indicating a need for continued planning for the needs of the senior citizen and elderly population.

Age	Number of People in Age Group	Percent of People in Age Group (Gwinnett County)	Percent of People in Age Group (Georgia)
Under 5	60,963	6.85%	6.44%
Under 18	246,180	27.66%	24.5%
Working Age (18-64)	564,876	63.47%	62.75%
Aging (65+)	78,898	8.87%	12.75%

Table 2: Population by Age

## Population Density

When looking at a population density, the classic model of density effects suggest that high density areas can cause residents to experience emotional stress and produce negative social affect and attitudes toward other people. Resource shortages, health problems, and overcrowding are some examples of the negative effects of living in a high density area. Gwinnett County has a total land area of 436.78 square miles of which 430.38 square miles are physical land. Based on 2013-2017 ACS data, Gwinnett County has a population density of 2,068 people per square mile in comparison to the state of Georgia that has a population density of 177 people per square mile. Considering Gwinnett County makes up only 0.7% of the state of Georgia’s total physical land area and the state has a vast rural area throughout the central and southern parts, density comparison can be considered inconclusive. Lawrenceville (231k), Snellville-Grayson(156k), and Lilburn(139k) have the most populated areas; however, Lilburn (2,990psm), Lawrenceville (2,799psm), and Norcross (2,620psm) have the higher population density. When comparing overall population density across all 29 counties,

Gwinnett ranks number three behind Cobb and DeKalb Counties. The chart and map below shows the population density of Gwinnett County by County Subdivision

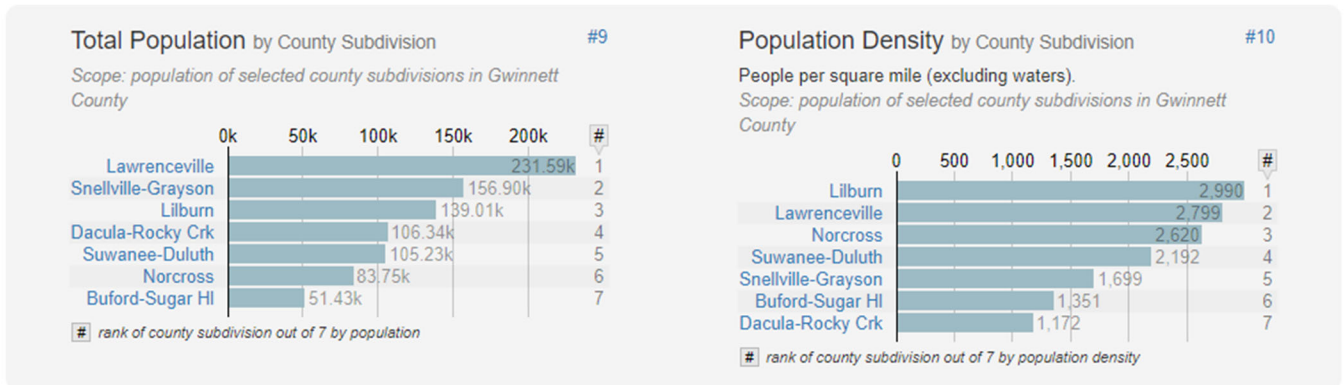


Figure 1: Total Population by County Subdivision

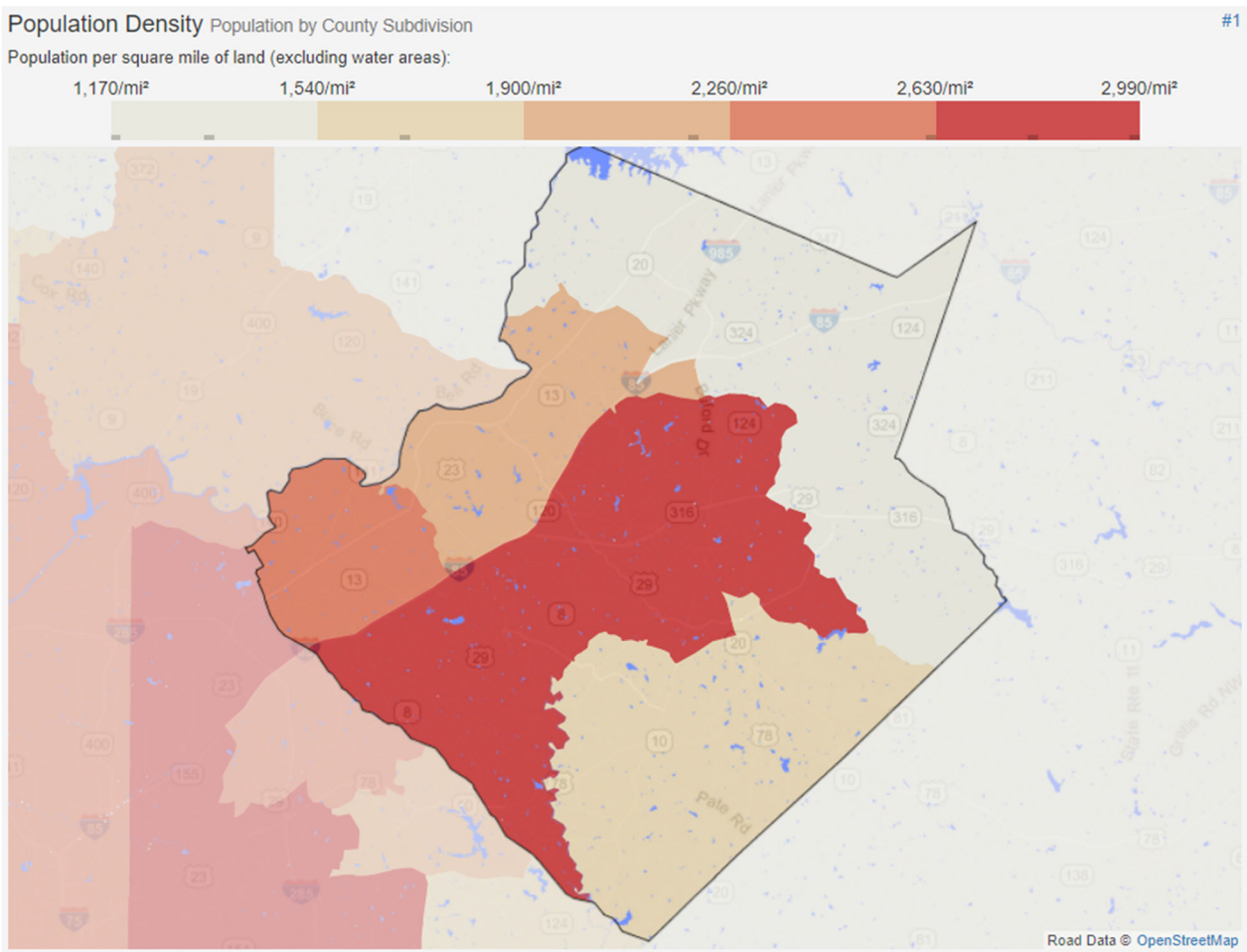


Figure 2: Total Population by County Subdivision



## Household Income

The median household income for Gwinnett County is considerably higher than the state’s average. The 2013-2017 ACS 5-year estimates reported an median income of \$64,496 for Gwinnett County. This represents a 6.98% increase from the 2015 median income of \$60,289 and a 2.02% increase from the 2010 median income. In 2015, median income decreased as result of the economic recovery. Even during this period, Gwinnett’s median income was still 21.50% higher than the state.

Median Income by Year						
	2010	2015	2017	% Change 2010-2015	% Change 2015-2017	% Change 2010-2017
<b>Gwinnett County</b>	\$ 63,219.00	\$ 60,289.00	\$ 64,496.00	-4.63%	6.98%	2.02%
<b>Georgia</b>	\$ 49,347.00	\$ 49,620.00	\$ 52,977.00	0.55%	6.77%	7.36%

Table 3: Household Income

## Poverty

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family’s total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Further, poverty is not defined for persons in military barracks, institutional group quarters, or for unrelated individuals under age 15 such as foster children. Poverty rates, similar to trends in national and state rates, have increased throughout Gwinnett County. Childhood poverty can be linked to negative outcomes in child development, health, and education. For example, children who experience early and persistent poverty are more likely to experience childhood and adult depression and anxiety, become high school drops outs, not seek higher education, and have higher rates of unemployment, criminal histories, use of public assistance.

According to the 2018 Descriptive Data Report from the Department of Family and Children Service, 644 individuals received benefits from the Temporary Assistance for Needy Families program with an annual benefit amount of \$1,247,394. 31,790 households in Gwinnett County received Food Stamp/SNAP benefits yielding an annual benefit amount of \$123,876,623. Those residents using food assistance benefits consisted of families with children under 18 years of age, families in poverty, and families with disabled residents. The report suggests that large percentages of the top three racial

groups ( Whites, Black, and Latinos) in the county needed food assistance. The use of public welfare resources has increased throughout the County following the in-migration of lower income residents.

DataSource:

[https://dfcs.georgia.gov/sites/dfcs.georgia.gov/files/related\\_files/site\\_page/Descriptive%20Data%20Report%20SYF2018\\_12262018.PDF](https://dfcs.georgia.gov/sites/dfcs.georgia.gov/files/related_files/site_page/Descriptive%20Data%20Report%20SYF2018_12262018.PDF)

	2013-2017			2008-2012		
	Total	Estimate	% below poverty Level	Total	Estimate	% below poverty Level
<b>White</b>	447,722	45,042	10.10%	425,179	38,753	9.10%
<b>Black or African American</b>	234,790	27,594	11.80%	187,005	26,636	14.20%
<b>American Indian and Alaska Native</b>	2,912	363	12.50%	2,523	385	15.30%
<b>Asian</b>	99,676	10,497	10.50%	86,693	9,702	11.20%
<b>Native Hawaiian and Other Pacific Islander</b>	371	60	16.20%	453	61	13.50%
<b>Some other race alone</b>	72,026	19,298	26.80%	81,513	30,898	37.90%
<b>Two or more races</b>	25,586	4,413	17.20%	21,033	3,435	16.30%
<b>Hispanic</b>	183,507	43,599	23.80%	160,777	50,367	31.30%

Table 4: Race and Poverty Trends

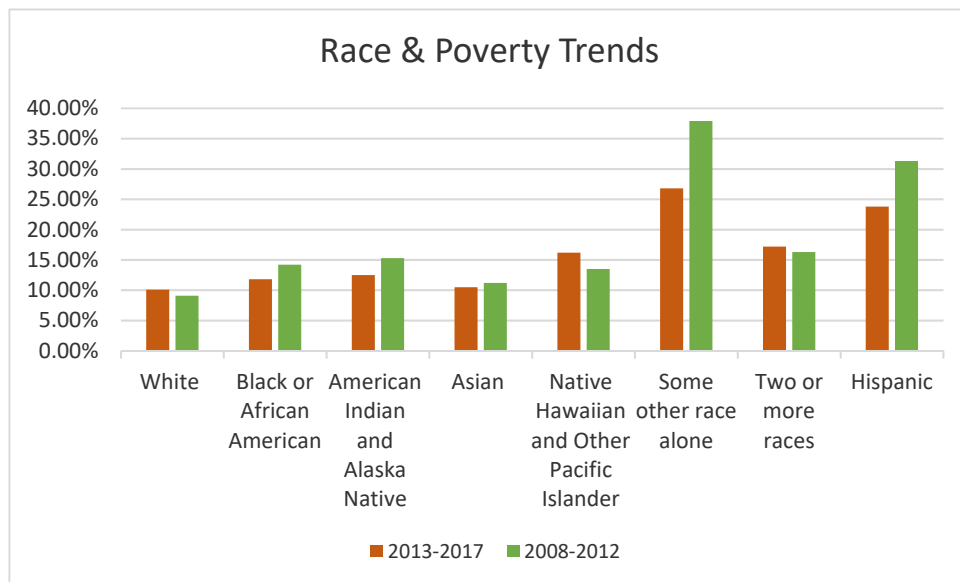


Chart 1: Race and Poverty Trends

## Protected Class Analysis

The Fair Housing Act and similar state fair housing laws list seven prohibited bases for housing discrimination: race, color, national origin, gender, familial status, disability, and religion. This protected class analysis addresses each of the federally protected population groups and their geographic distribution in Gwinnett County, Georgia.

### Race and Ethnicity

According to the 2013-2017 ACS Demographic and Housing Estimates, Gwinnett County had an estimated population of 889,954, up by 14.38% since the 2006-2010 ACS data release. Based on the 2013 - 2017 ACS data, only 39.26% of the population was comprised of non-Latino whites while the minority groups (Black (25.94%), Hispanic (20.75%), and Asian (11.20%)) represent most Gwinnett's population. The minority population has grown from 413,526 (2006-2010 ACS) to 540,520 in (2013-2017 ACS), a 30.71% increase in population over a seven-year period. Among the minority groups listed; the Black or African American population grew the most adding 37,265 persons to the County. The racial and ethnic makeup of Gwinnett County has remained steady over the past ten years making Gwinnett a majority-minority jurisdiction. Current estimates suggest that the growth rate for minority groups will continue to increase over the next five years.

**Gwinnett County Demographic Breakout**

RACE	2006-2010		2011-2015		2013-2017	
	ACS 5yr Estimates		ACS 5yr Estimates		ACS 5yr Estimates	
	Counts	Percent	Counts	Percent	Counts	Percent
<b>Total Population</b>	778,022	100.00%	859,234	100.00%	889,954	100.00%
<b>Hispanic or Latino</b>	147,356	18.94%	174,843	20.35%	184,621	20.75%
<b>White</b>	364,496	46.85%	354,281	41.23%	349,434	39.26%
<b>Black</b>	169,286	21.76%	212,639	24.75%	230,815	25.94%
<b>Asian</b>	80,718	10.37%	94,351	10.98%	99,659	11.20%
<b>American Indian/ Alaska Native</b>	1,492	0.19%	1,606	0.19%	1,359	0.15%
<b>Native Hawaiian/ Pacific Islander</b>	419	0.05%	348	0.04%	329	0.04%
<b>Some Other race</b>	2,437	0.31%	3,213	0.37%	4,246	0.48%
<b>Two or more races</b>	11,818	1.52%	17,953	2.09%	19,491	2.19%

Table 5: Gwinnett County Demographics

Source: U.S. Census Bureau, 2010, 2015 & 2017 ACS 5 Year Estimates,  
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

The following maps show the racial and ethnic composition of Gwinnett County by census tract. Overall, White persons live in the horseshoe that covers Northern and Eastern Gwinnett, and in some portions of South Gwinnett, Black or African-American persons live in the southern tip of Gwinnett, Asian persons live in Western Gwinnett, and Hispanic persons concentrate along I-85.

The map shown below highlights areas where the White population resides in Gwinnett County. The darker shaded areas indicate more concentration of people near the cities of Auburn, Braselton, Buford, Sugar Hill, and Suwanee. Another band of Census Tracts that contains a high percentage of White persons stretches across Southern Gwinnett County that is just south of Lilburn, and runs through Snellville, Grayson and into Loganville.

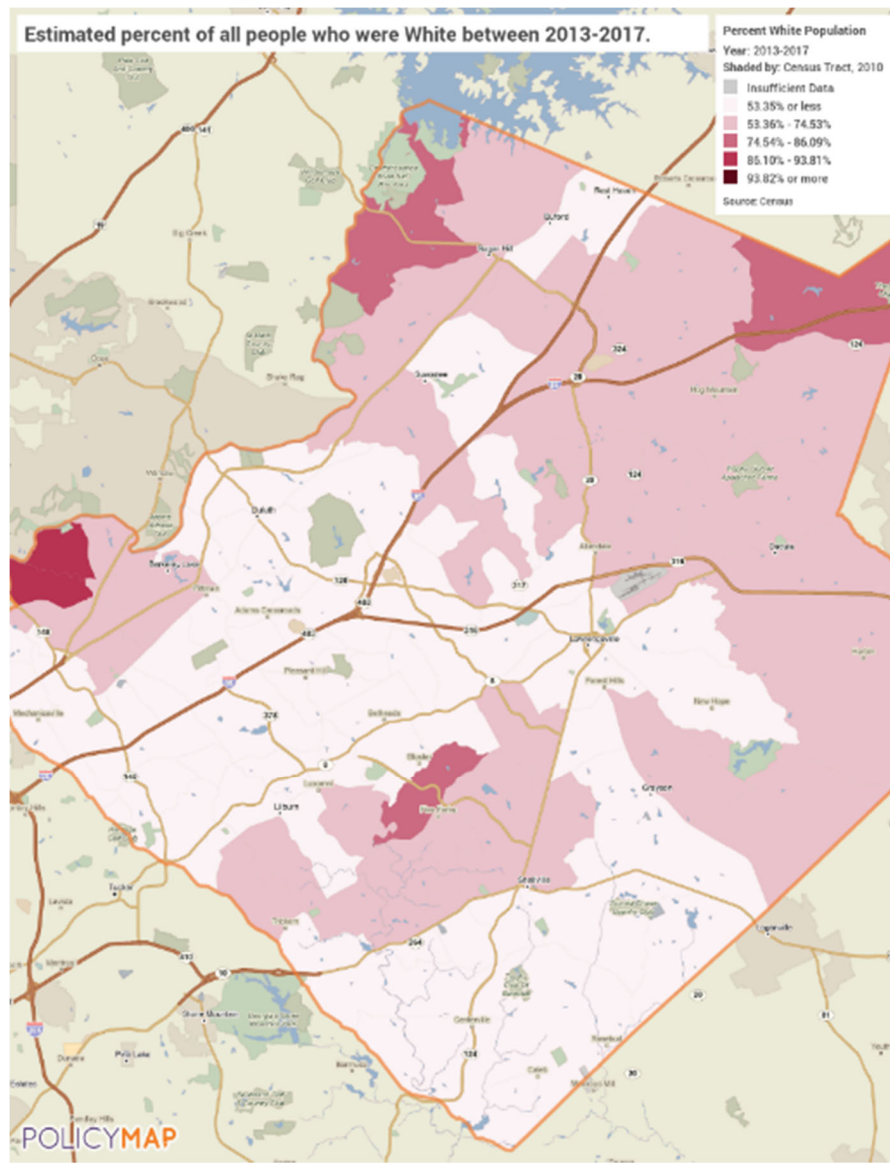


Figure 3: Gwinnett County White Population - Source: [www.policymaps.com/maps](http://www.policymaps.com/maps)

The next map displays the share of the population that is African American by Census Tract 2010, Year 2013-2017 Estimates. Blacks made up most of the population in census tracts located in southeast portion of the County. Additionally, there are higher concentrations of Black or African American persons in central Gwinnett around the city of Lawrenceville and just south of the I-85 corridor.

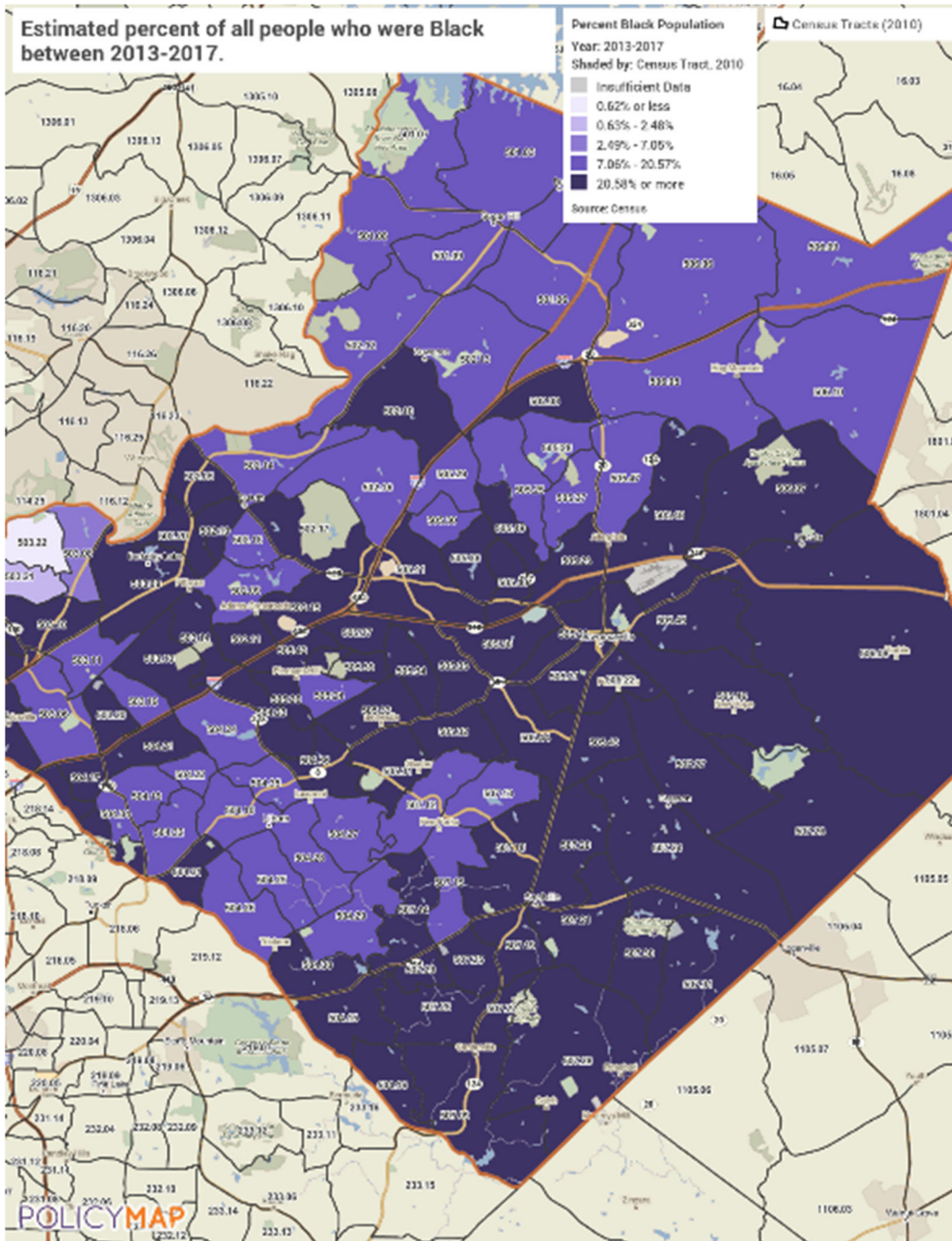


Figure 4: Gwinnett County Black Population - Source: [www.policymaps.com/maps](http://www.policymaps.com/maps)



The Asian population, as illustrated in the figure below, is concentrated in West Gwinnett. The cities of Duluth, Berkley Lake, and Suwannee show the highest concentration of Asian persons in the County. Concentrations of the Asian population also stretch across Gwinnett County's western border into Fulton County and the neighboring City of Johns Creek. Areas of Asian population appear in Norcross and Lilburn, but most of those Census Tracts contain populations that are closer to 10%.

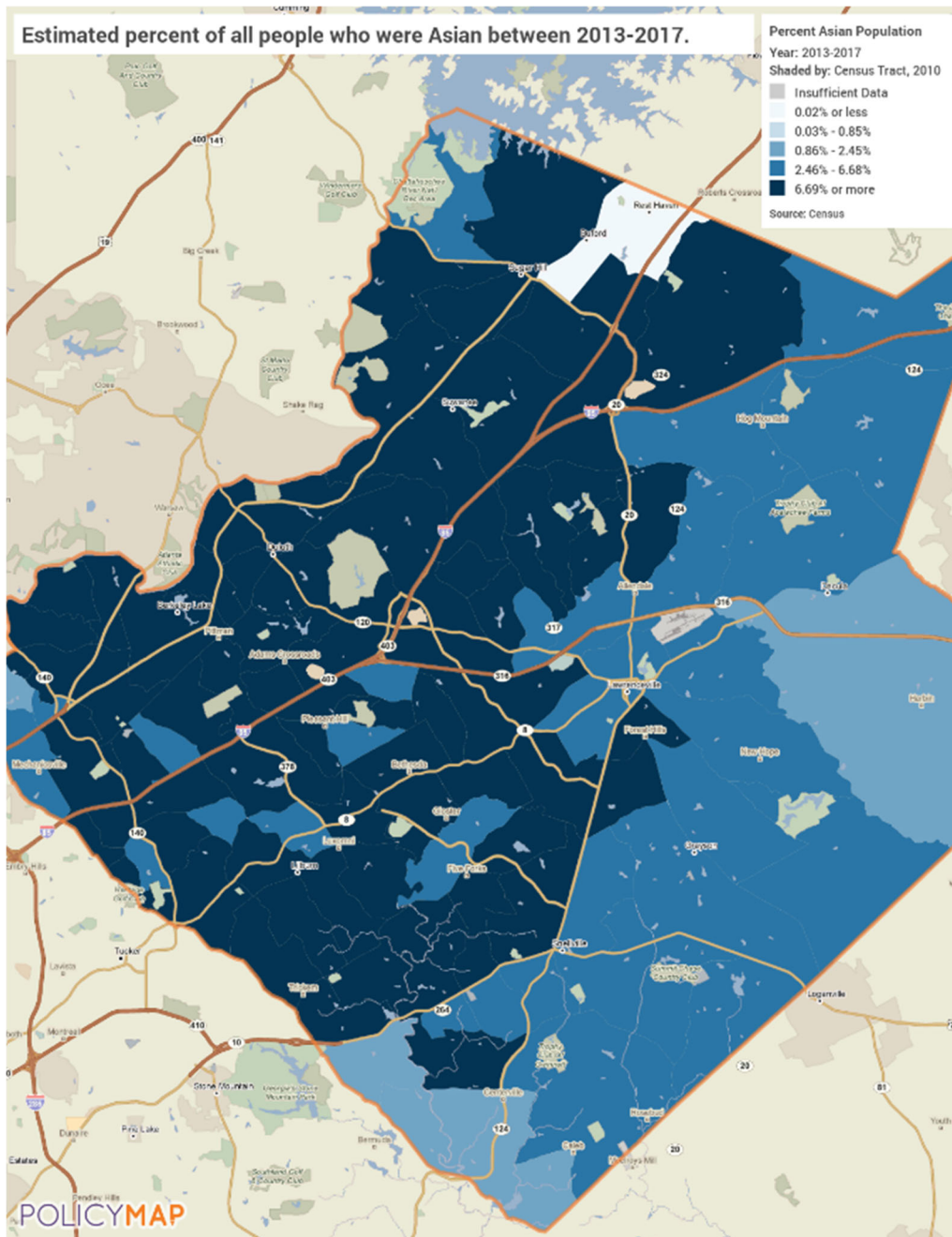


Figure 5: Gwinnett County Asian Population - Source: [www.policymaps.com/maps](http://www.policymaps.com/maps)

The Hispanic population of Gwinnett County follows the I-85 corridor up from Southwest Gwinnett County. The concentrations of this population are centered in the cities of Norcross, and Lilburn and run northward along I-85 into Lawrenceville. There is also a pocket of this population located in the northern most part of the County in the City of Buford.

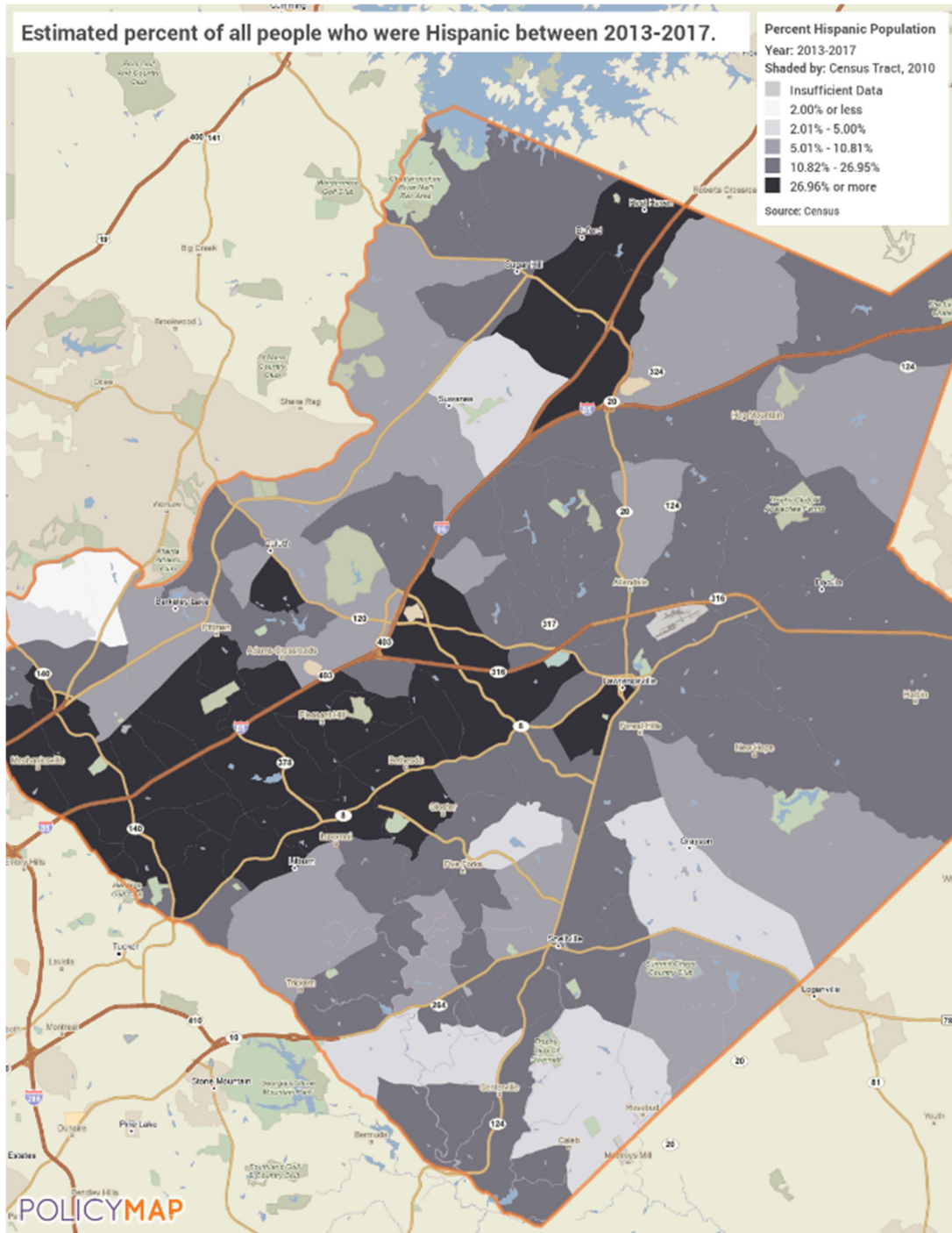


Figure 6: Gwinnett County Hispanic Population - Source: [www.policymaps.com/maps](http://www.policymaps.com/maps)

## Gender

The proportion of males versus females in Gwinnett County has remained leveled since 2010 when the females were estimated at 50.68% of the population and males were 49.32%. Based on the map below, higher male concentrations are in the eastern side of the County whereas the female concentrations are high in several areas in the Northern and Southern sections of the County. The female population in Gwinnett is on a steady increase and is expected to remain on this upward trajectory over the next five years.

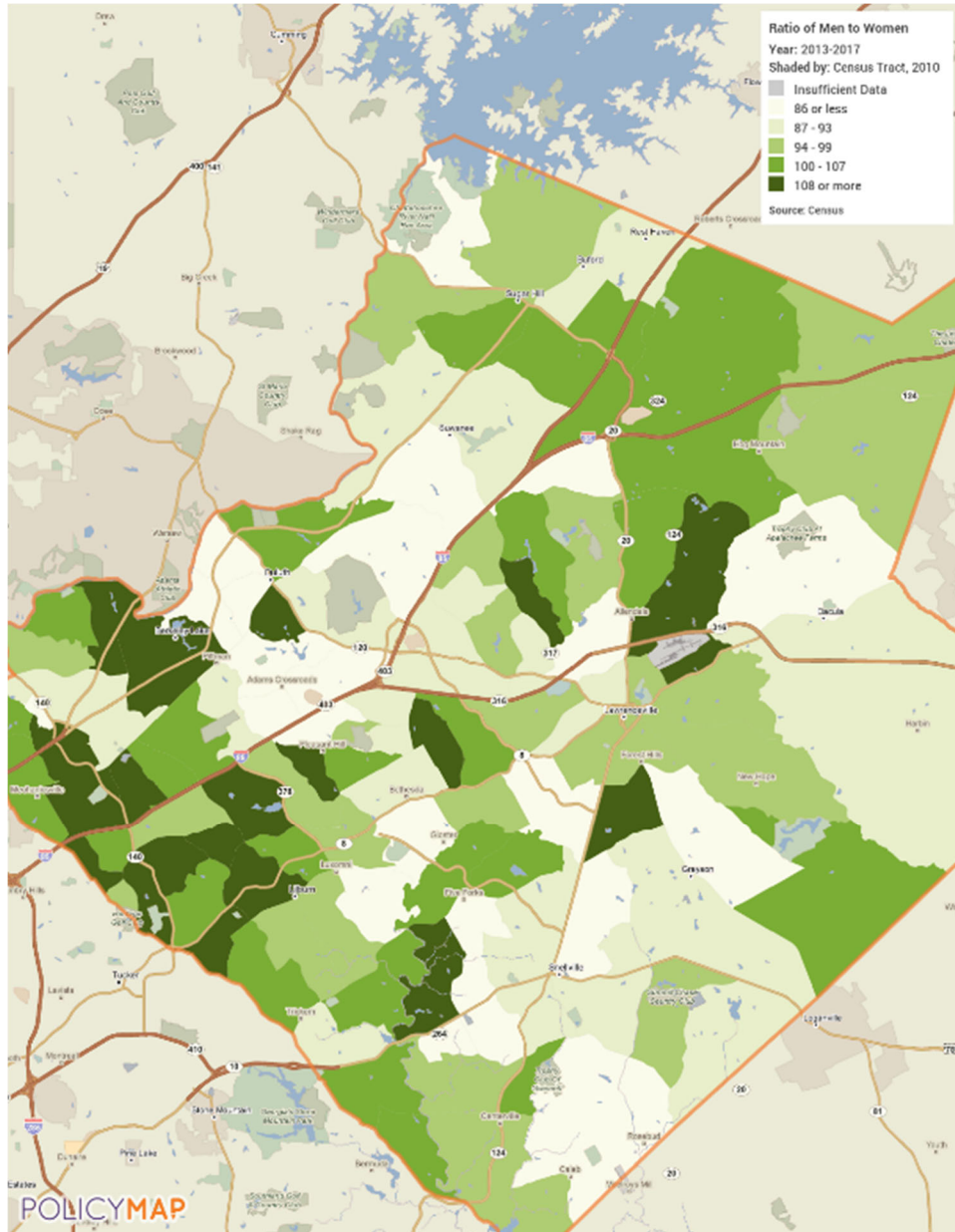


Figure 7: Gender Ratios - Source: [www.policymaps.com/maps](http://www.policymaps.com/maps)



The table below shows that in 2017, the number of females in the county slightly increased to 51.08% compared to males at 48.92%. The current gender ratio (male to female) in Gwinnett County is 96:100. This ratio is higher than the state ratio of 95:100 and lower than the national ratio of 97:100.

Gwinnett County Gender Composition					
	Total Population	Male		Female	
2000	588,444	296,745	50.43%	291,699	49.57%
2010	805,321	397,153	49.32%	408,168	50.68%
2017	889,954	435,401	48.92%	454,553	51.08%

Table 6: Gwinnett County Gender Composition

Source: U.S. Census Bureau, 2013-2017 ACS 5 Year Estimates, Accessed August 26, 2019

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

## Familial Status

For the purposes of this analysis, families are groups of related people who live together, whereas households refer to the person or group of people living in anyone housing unit. Households that do not contain a family are made up of unrelated people living together (i.e. roommates) or people living alone. According to the 2013-2017 ACS data, there were 283,256 households in Gwinnett County.

Familial Status in Gwinnett County					
Household Type	2010		2017		% Change
<b>Family Households</b>	196,717	75.55%	215,104	75.94%	9.35%
<b>Married couple householders</b>	149,020	75.75%	160,451	74.59%	7.67%
<b>With related children under 18</b>	80,765	54.20%	80,717	50.31%	-0.06%
<b>No related children under 18</b>	68,255	45.80%	79,734	49.69%	16.82%
<b>Male householders, no wife</b>	13,484	6.85%	14,923	6.94%	10.67%
<b>With related children under 18</b>	6,179	45.82%	7,503	50.28%	21.43%
<b>No related children under 18</b>	7,305	54.18%	7,420	49.72%	1.57%
<b>Female householders, no husband</b>	34,213	17.39%	39,730	18.47%	16.13%
<b>With related children under 18</b>	22,589	66.02%	23,388	58.87%	3.54%
<b>No related children under 18</b>	11,624	33.98%	16,342	41.13%	40.59%
<b>Total Family households with children under 18</b>	109,533	55.68%	111,608	51.89%	1.89%
<b>Nonfamily Households</b>	63,658	24.45%	68,152	24.06%	7.06%
<b>Total Households</b>	260,375	100.00%	283,256	100.00%	8.79%
<b>Householder living alone</b>	51,340	19.72%	55,453	19.58%	8.01%
<b>65 years and over</b>	9,541	18.58%	14,551	26.24%	52.51%

Table 7: Familial Status in Gwinnett County

Source: U.S. Census Bureau, 2013-2017 ACS 5 Year Estimates, Accessed August 26, 2019 -

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Of the total households reported, 75.94% are families and 24.06% is non-family households. The Family Household data breakdowns families into three categories: female, no husband; male, no wife; and married couples. Married couples continue to represent over half (56.65%) of the total households in Gwinnett County with over a seven percent increase since 2010. Female, no husband households represent 18.47% and male, no wife households represent 6.94% of the total family household composition. An analysis of changes in household types in Gwinnett County between 2010 and 2017 indicates a continued growth in the number of married couples with children of no relations. In comparison, non-family households grew by 7.06% from 2010 to 2017. These trends indicate growing a family-based community that reflect a diverse family type in terms of households' composition in Gwinnett County that is reflective of national trends.

The map below identifies concentrations of households with children. In two thirds of tracts, households with children represent more than 50% of all households. The County's two RCAP/ECAP falls within this range as well. The heaviest concentrations of households with children (50% or more) are located in Gwinnett's northern borders, adjacent to Hall and Barrow Counties. Lowest shares (under 30%) are shown in pockets of Duluth and Snellville.

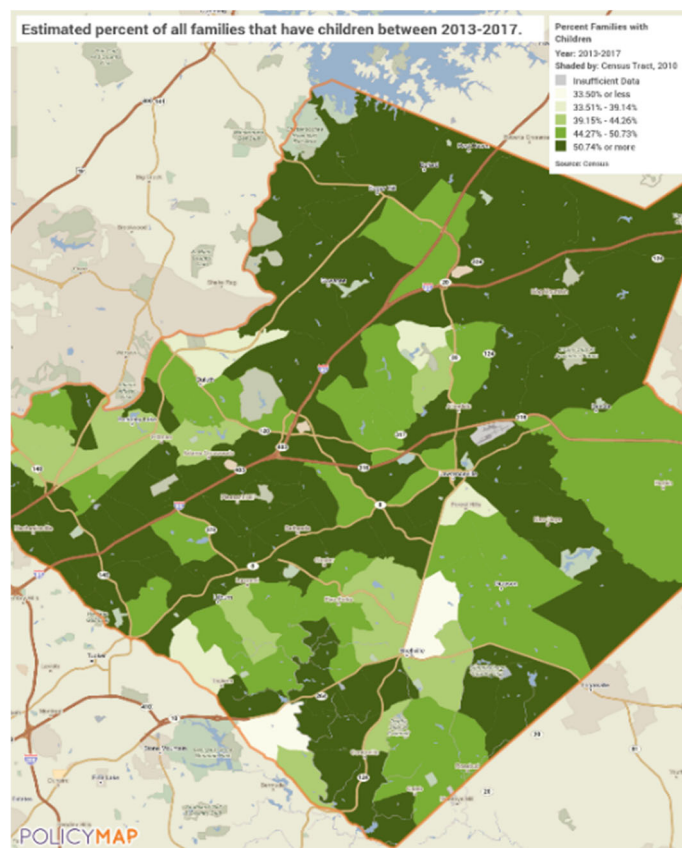


Figure 8: Total Households with Children

Female householders as a share of total households are shown in the map below. Tracts with the largest share of female householders (40% or more) tend to be located in the central tracts and in the County's southern tip. The lowest shares of female householders (less than 4.38% of each tract) are found in various pockets throughout the northern and western corners of the County.

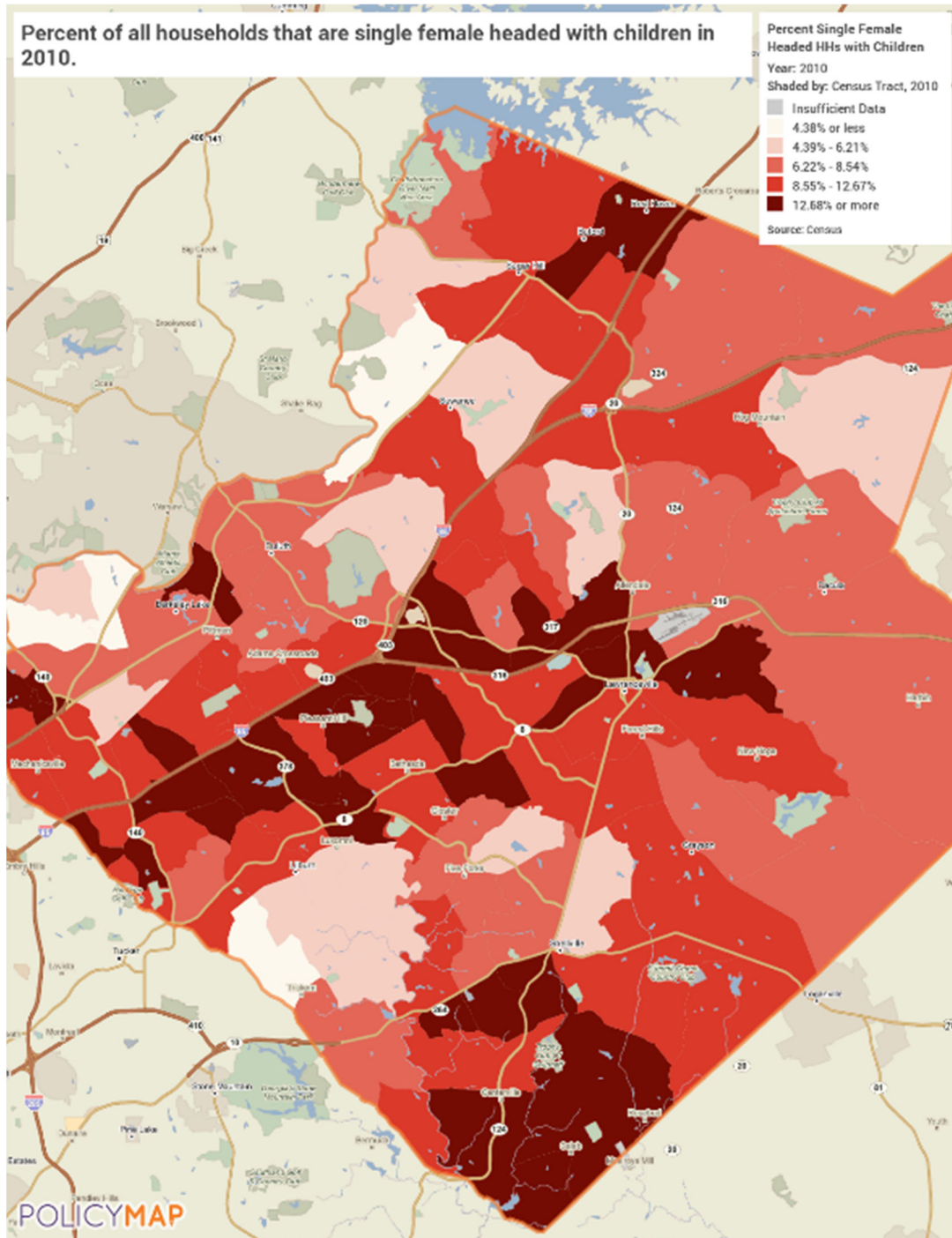


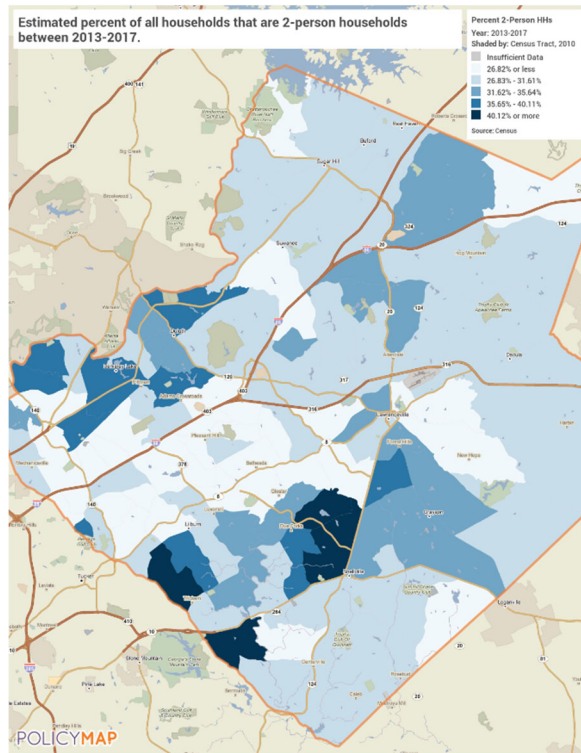
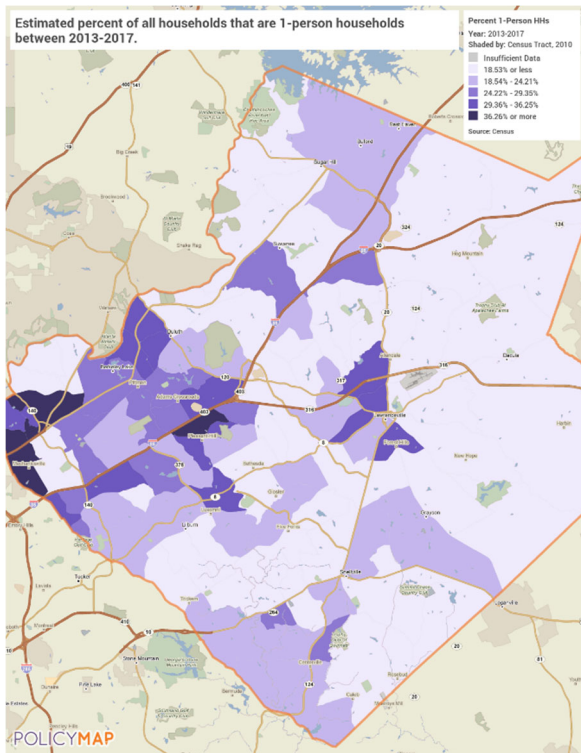
Figure 9: Female Households with Children

Household size is an important reflection of the housing choices available to both renters and owners. The table below breaks down the household size in Gwinnett County. According to the 2013-2017 ACS estimates, there are 471,785 total households. Over 50% of the households in Gwinnett County are owner-occupied with 32.08% of those households containing 4 persons. The rental households comprise 39.96% of the households in Gwinnett with 33.17% of those having 4 persons. As shown in the maps below, Gwinnett County has high concentrations of 3 and 4 person households whereas there are small pockets of 1-2 person households to the west.

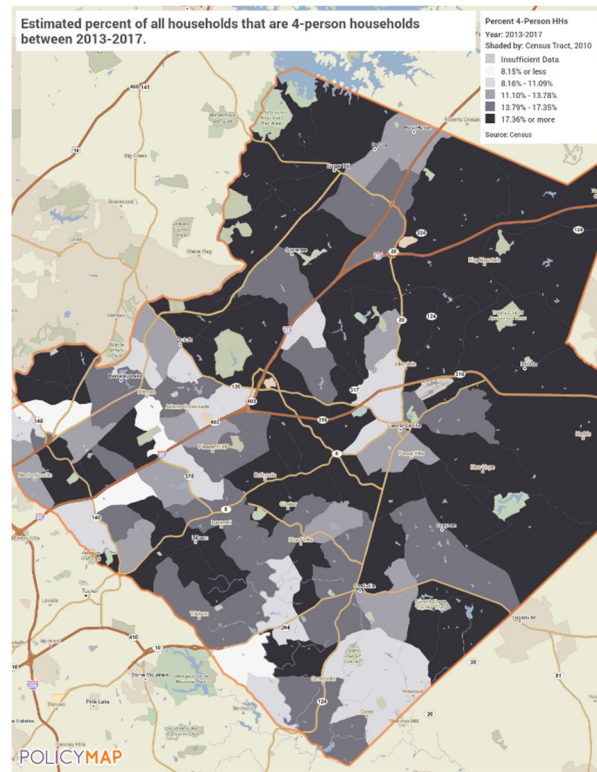
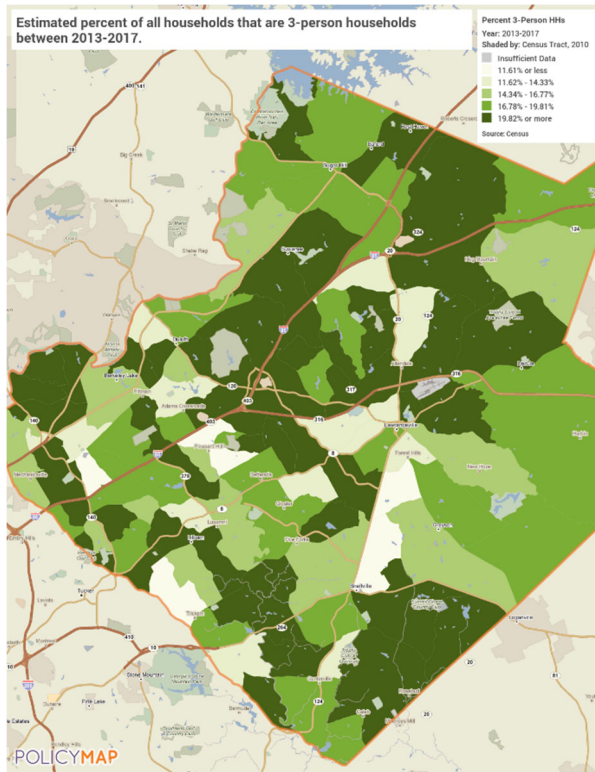
Household Size in Gwinnett County				
Household Size	Owner		Renter	
Total Households	283,256		188,529	
1-Person Household	55,453	19.58%	30,511	16.18%
2-Person Household	82,677	29.19%	59,558	31.59%
3-Person Household	54,247	19.15%	35,926	19.06%
4-Person Household	90,879	32.08%	62,534	33.17%

Table 8: Household Size in Gwinnett County

Source: U.S. Census Bureau, 2013-2017 ACS 5 Year Estimates, Accessed August 26,2019  
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>







## National Origin

According to the 2013-2017 ACS estimates, a quarter (25.02%) of the County's population is foreign born. Census defines foreign born as anyone who is not a U.S. citizen at birth. According to the Department of Homeland Security, 26,242 people were granted Legal Permanent Residence status in 2017. Those LPRs, or "green cards", represent 2.33% of green cards issued in the nation that year.

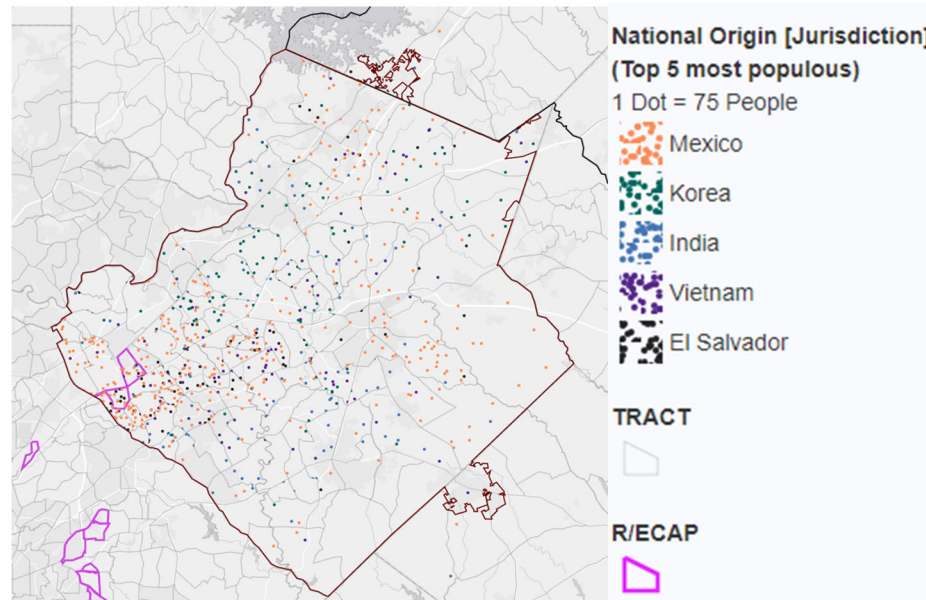
Selected Social Characteristics in the United States		
National Origin	Population	Percentage
Total Population	889,954	100%
Native Population	667,259	74.98%
Foreign Born	222,695	25.02%
Foreign Born – Naturalized Citizen	100,822	11.33%
Foreign Born – Not a U.S. Citizen	121,873	13.69%

Selected Social Characteristics in the United States		
National Origin	Population	Percentage
Foreign Born population	222,695	100%
Europe	17,341	7.79%
Asia	74,239	33.34%
Africa	22,513	10.11%
Oceania	407	0.18%
Latin America	106,416	47.79%
Northern America	1,779	0.80%

Table 9: Selected Social Characteristics in the US

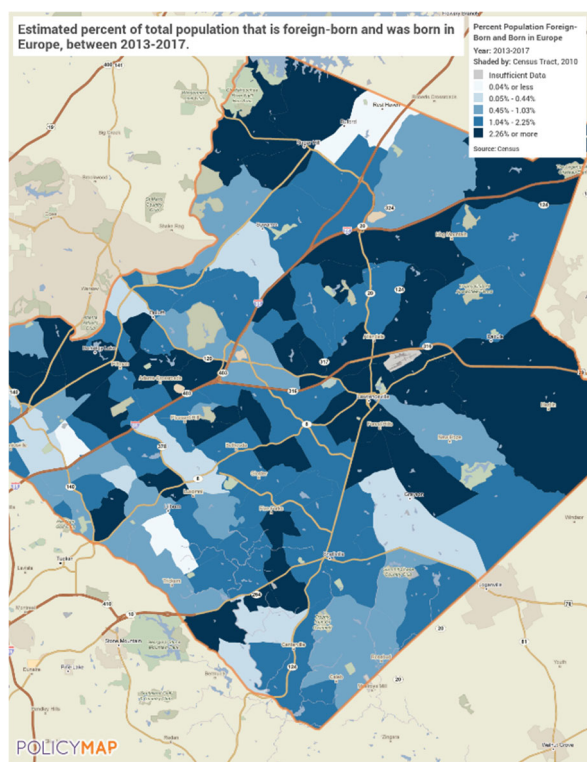
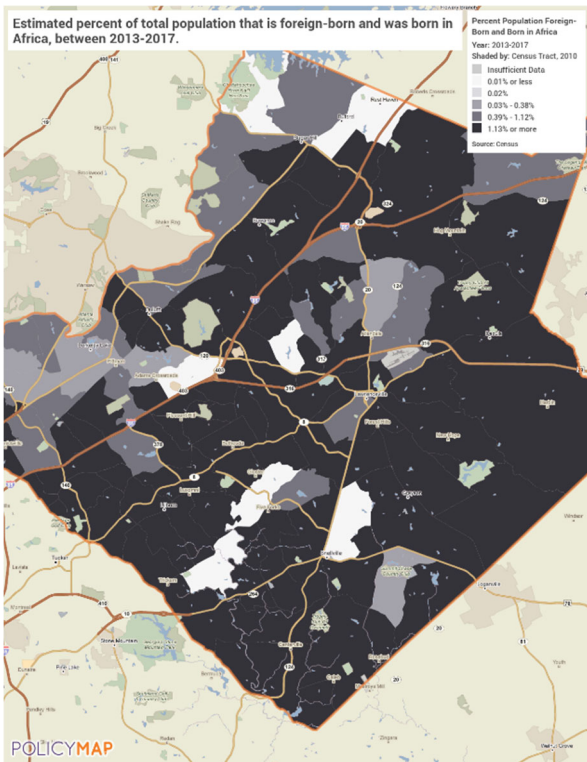
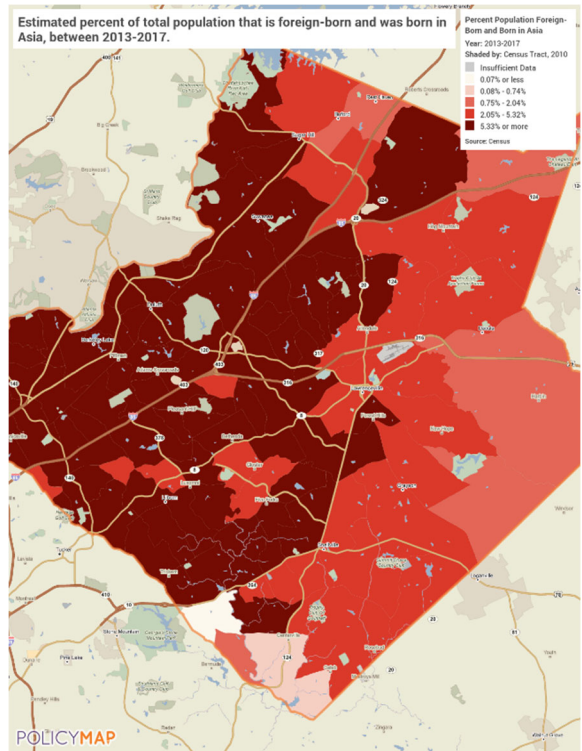
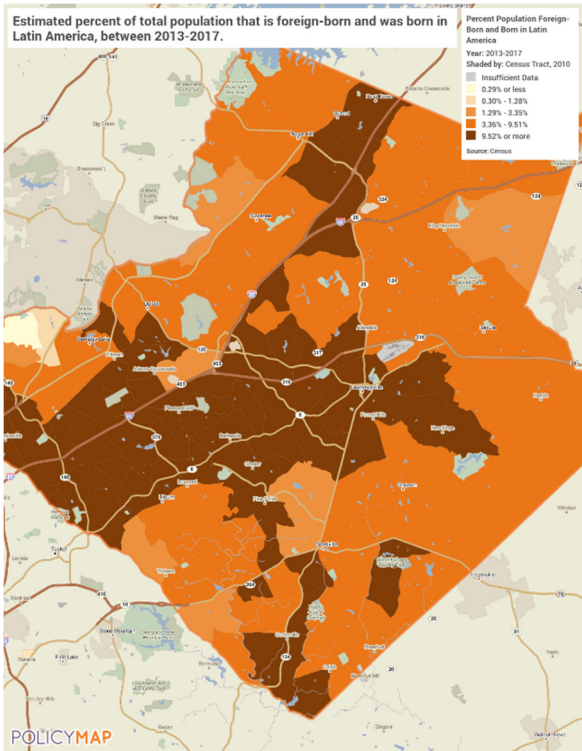
Source: U.S. Census Bureau, 2013-2017 ACS 5 Year Estimates, Accessed August 26, 2019  
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

A closer examination of nativity data reveals that the largest shares of foreign-born residents living along the I-85 corridor in Gwinnett County are from Latin America (47.79%) and Asia (33.34.0%). Africa and Europe constituted 7% of the foreign-born population and Oceania and Northern America account for less than 1%. The maps below identify Gwinnett County's foreign-born population by census tract. The highest concentration of foreign-born residents is along the I-85 corridor, in areas along U.S. 29 and Ronald Reagan Parkway, and in the southern and eastern areas adjacent to Lawrenceville.



*Figure 10: National Origin in Gwinnett County*

The maps on below identifies Gwinnett County's foreign-born population by country of origin. The highest concentration of foreign-born residents is along the I-85 corridor, in areas along U.S. 29 and Ronald Reagan Parkway, and in the southern and eastern areas adjacent to Lawrenceville. As you will see in the following maps, the darker shaded region represents more concentration of the four most populous countries of origin.



## Disability

As of the most recent American Community Survey data (2013-2017), Gwinnett County has a total population of 64,002 non-institutionalized disabled residents or 7.23% of the total population. Of persons with a disability, 64.34% are under the age of 65 and the remaining 35.66% were 65 or over. Housing needs for residents with a disability vary depending on several factors including disability type. For the purposes of this analysis, Gwinnett County will utilize the American Community Survey definitions to measure the following disabilities:

- Hearing Difficulty: Deaf or having serious difficulty hearing.
- Vision Difficulty: Blind or having serious difficulty seeing
- Cognition Difficulty: Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory Difficulty: Having a serious difficulty walking or climbing stairs.
- Self-care Difficulty: Having a difficulty bathing or dressing.
- Independent Living Difficulty: Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.

Ambulatory, cognitive, and independent living are the most common difficulties that affect residents with disabilities in Gwinnett County. Note that the total number of difficulties in comparison to Gwinnett's total disabled population suggest that many people face more than one difficulty. The disabled population of Gwinnett County distributed throughout the entire County with some concentrated areas located near Buford, Lawrenceville, Snellville and Lilburn. The majority of the disabled population in Gwinnett County is aged between 18 and 64 years. The ability to meet the housing needs of disabled residents is impacted by an array of factors – such as zoning regulations for group homes, the ease with which modifications may be made to existing homes, and the availability of fair housing services – which are each examined in other sections of this report.

The Gwinnett County Consolidated Plan/AI 2020-2024 Needs Assessment Survey asked if “there is sufficient housing in Gwinnett County for persons with disability?” Of the survey respondents, 59% stated that they do not know if there is sufficient housing for residents with disabilities and over 32% of survey respondents said that there are not sufficient housing opportunities for persons with disabilities.



Selected Social Characteristics in the U.S.		
<b>Total Civilian Non-Institutionalized Population</b>	884,817	100%
<b>With a disability</b>	64,002	7.23%
<b>Under 18 years</b>	246,084	27.81%
<b>With disability</b>	6,520	0.74%
<b>18 to 64 years</b>	560,805	63.38%
<b>With disability</b>	34,657	3.92%
<b>65 years and over</b>	77,928	8.81%
<b>With disability</b>	22,825	2.58%

Table 10: Selected Social Characteristics in the U.S.

Source: U.S. Census Bureau, 2013-2017 ACS 5 Year Estimates, Accessed August 26, 2019  
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

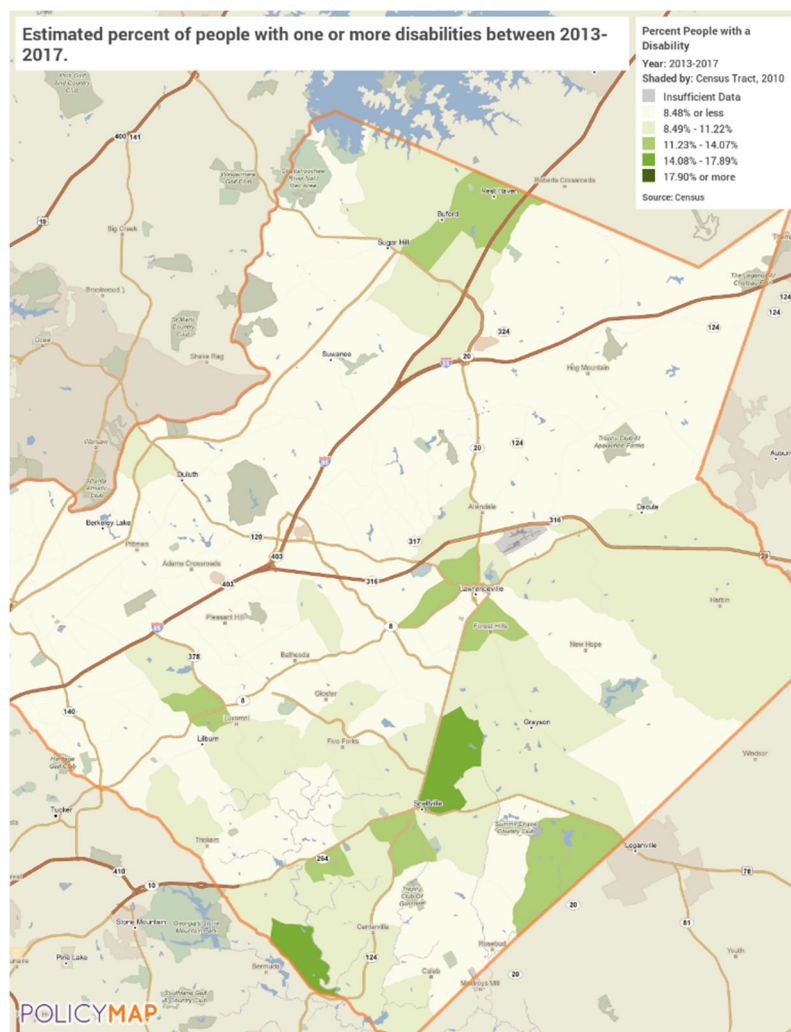


Figure 11: Percent with Disabilities

Source: Policy Maps, Gwinnett County, GA, Accessed on August 27, 2019.  
<http://www.policymaps.com>

## Religion

The U.S. Census Bureau does not survey residents about their religion. This makes it difficult to find dependable and comprehensive data on religious affiliations. The data used in this analysis is from the 2010 U.S. Religion Census: Religious Congregations & Membership Study, a county-by-county enumeration of religious bodies in the U.S. published by the Association of Statisticians of American Religious Bodies (ASARB). For the purposes of this data the term adherent refers to a person affiliated with a congregation, including children, members, and attendees who are not members.

The data below shows an increase in the number of adherents from 1980 to 2010 that mirrors the pattern of Gwinnett County's population growth. From 1980 to 1990 the number of adherents in Gwinnett County tripled and doubled from 1990 to 2010. During those same time frames the growth rate for congregations also increased; reporting a 349.18% rise over the last four decades.

Religious Congregations and Their Adherents 2010				
Year	Adherents	Change Over Decade	Congregations	Change Over Decade
1980	56,281	N/A	122	N/A
1990	154,860	175.2%	197	61.5%
2000	249,329	61.0%	305	54.8%
2010	366,708	47.1%	548	79.7%

Table 11: Religious Congregations and Adherents Source: 2010, 2000, 1990, and 1980 ASARB Religious Census

The table below shows the three largest individual religious bodies, their adherents, and congregations over the last 40 years. The Southern Baptist Convention represents the largest religious body in Gwinnett County with over 100,000 adherents and over 100 congregations. In 2010, the Catholic Church surpassed the United Methodist Church for being the second largest religious body in terms of adherents. The United Methodist Church has tripled the number of congregations than the Catholic Church.

Religious Congregations and Their Adherents 2010				
	1980	1990	2000	2010
Southern Baptist Convention				
<b>Adherents</b>	26,542	55,300	91,854	108,623
<b>Congregation</b>	34	53	68	142
The United Methodist Church				
<b>Adherents</b>	13,558	27,309	40,623	51,680
<b>Congregation</b>	34	33	38	37
Catholic Church				
<b>Adherents</b>	5,035	22,028	47,177	67,781
<b>Congregation</b>	4	6	9	12

The Non-Denominational Religious Body ranked fourth in the 2010 U.S. Religion Census. In 10 years, they added 34,293 adherents and 70 Congregations. Their growth rate exceeds the growth of the top three religious' bodies in Gwinnett County within a singular decade than by any of the four decades analyzed.

Source: 2010, 2000, 1990, and 1980 ASARB Religious Census

## Concentrate Areas of Poverty (R/ECAPs)

The degree to which a jurisdiction's minority residents are concentrated in high-poverty areas is one way to analyze access to housing within a jurisdiction. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. Most of the analyses that are prepared looking at Fair Housing Choice examine factors such as demographic makeup, segregation, public infrastructure, and economic conditions of a given jurisdiction. For years, the Census Bureau has looked at its data and defined any census tract that contains more than 20% of the families over the poverty level as a concentrated area of poverty.

HUD now defines a racially and ethnically concentrated area of poverty (RCAP/ECAP) as a census tract with an individual poverty rate of 40% or more (or an individual poverty rate at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more.

Using this definition, there are two census tracts in Gwinnett County that qualify as RCAP/ECAPs, based on 2013-2017 ACS estimates. The first tract 505.41 located in the City of Lawrenceville is home to 5,061 residents and is 43.51% Hispanic and 42.28% Black, non-Hispanic. The second tract is 503.20 located in the City of Norcross and is home to 5,598 residents with 60.9% Hispanic population. White residents are less likely to live in these tracts, representing only 9.64% and 12.72% of the population in these tracts respectively.

<b>R/ECAP Demographics</b>		
<b>(Gwinnett County, GA CDBG, HOME, ESG) Jurisdiction</b>		
<b>R/ECAP Race/Ethnicity</b>	<b>#</b>	<b>%</b>
Total Population in R/ECAPs	11,725	-
White, Non-Hispanic	1,225	10.45%
Black, Non-Hispanic	1,506	12.84%
Hispanic	7,901	67.39%
Asian or Pacific Islander, Non-Hispanic	916	7.81%
Native American, Non-Hispanic	18	0.15%
Other, Non-Hispanic	16	0.14%
<b>R/ECAP Family Type</b>		
Total Families in R/ECAPs	2,294	-

Families with children	1,420	61.90%
<b>R/ECAP National Origin</b>		
#1 country of origin - Mexico	2,839	24.21%
#2 country of origin - El Salvador	767	6.54%
#3 country of origin - Guatemala	366	3.12%

Table 12: RCAP/ECAP Summary Table

The map below shows the exact location RCAPs/ECAPs outlined in purple.

RCAPs/ECAPs Map

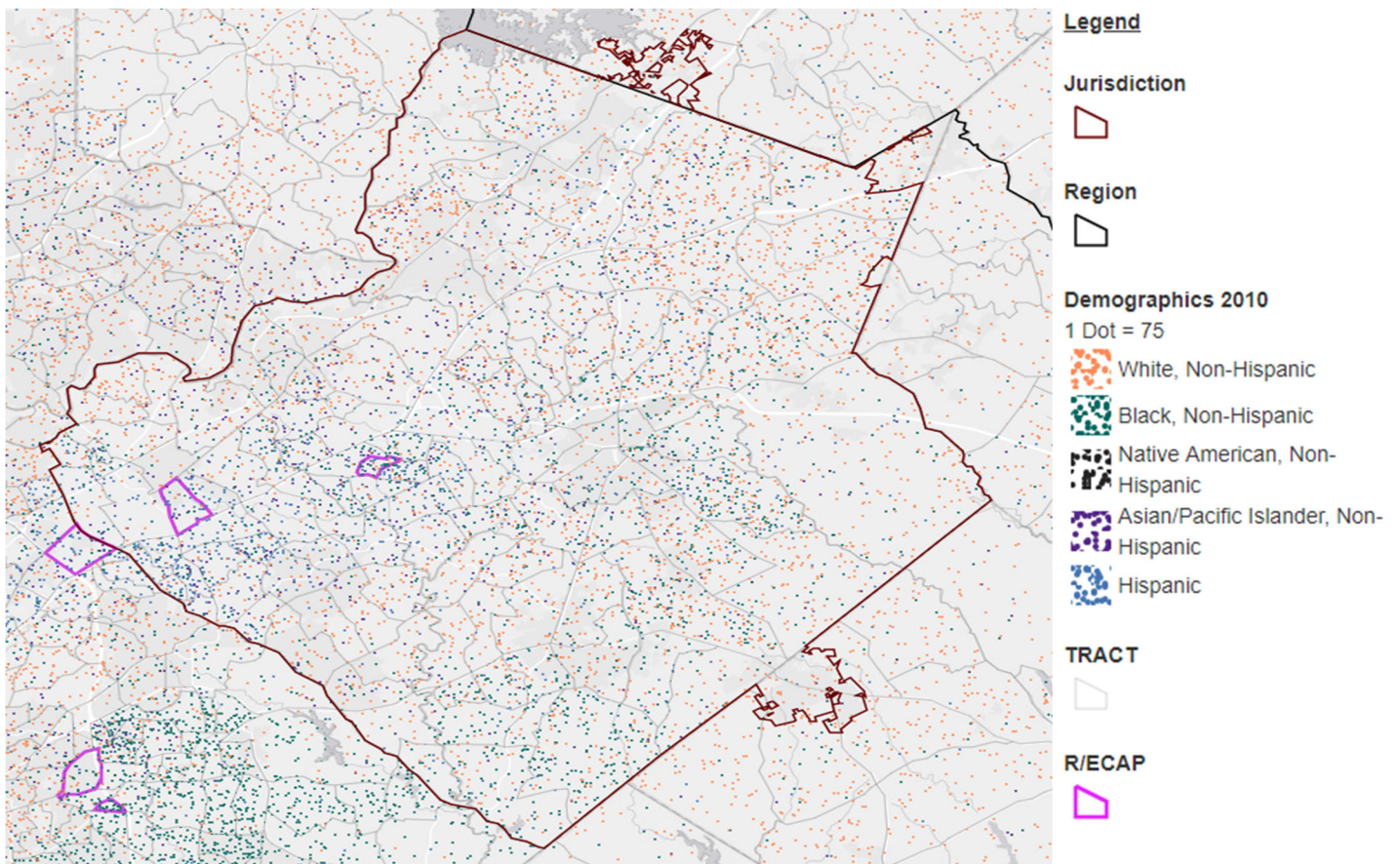


Table 13: R/ECAPS

## Segregation Analysis

Segregation, or the degree to which two or more racial or ethnic groups live geographically separate from one another, can directly affect the quality of life in cities and neighborhoods. A study by the Federal Reserve Bank of Cleveland compared the economic growth of more than 100 areas in the U.S. between 1994 and 2004 and concluded that racial diversity and inclusion was “positively associated with a host of economic growth

measures, including employment, output, productivity, and per capita income.”<sup>6</sup> In general, diverse communities benefit from greater innovation arising out of the varied perspectives within the community. Additionally, multilingual and multicultural regions are positioned for success in the global marketplace. In contrast, “persistent economic and racial residential segregation is implicated in enduring racial and ethnic inequality.”<sup>7</sup>

Segregation Analysis is used to determine the degree to which residents in Gwinnett County are segregated by race and ethnicity. Segregation is measured by three categories: Dissimilarity Index, Exposure Index and Isolation Index. The primary data sources that were used for this analysis is the U.S. Census Bureau and Census Scope.

This report will use several types of analysis to the measure the evenness of the population distribution by race (dissimilarity index) as well as measures of exposure of one race to another (exposure and isolation indexes). Workers in the field generally agree that these measures adequately capture the degree of segregation. These measures have the advantage of frequent use in segregation analyses and are based on commonsense notions of the geographic separation of population groups. An additional analysis for the Entropy Index will provide a measure of multi-group diversity not accounted for by the other indices, which necessarily are limited to two racial or ethnic groups at the time.

### **Dissimilarity Index**

The Dissimilarity Index (DI) measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group because the two groups are not evenly distributed geographically. A high value indicates that the two groups tend to live in different tracts. The DI ranges from zero (complete integration) to 100 (complete segregation). A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are considered a moderate level of segregation, and values of 30 or below are considered low. Overall, the DI calculations followed the pattern of the County’s diversification.

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<sup>6</sup> Policy Link. 2011. “America’s Tomorrow: Equity is the Superior Growth Model.” [http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406da6d5eca3bbf35af0%7D/SUMMIT\\_FRAMING\\_WEB\\_FINAL\\_20120127.PDF](http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406da6d5eca3bbf35af0%7D/SUMMIT_FRAMING_WEB_FINAL_20120127.PDF) Page | 43

<sup>7</sup> Bruch, E. 2005. “Residential Mobility, Income, Inequality, and Race/Ethnic Segregation in Los Angeles.” Princeton, NJ: Princeton, University, pp. 1



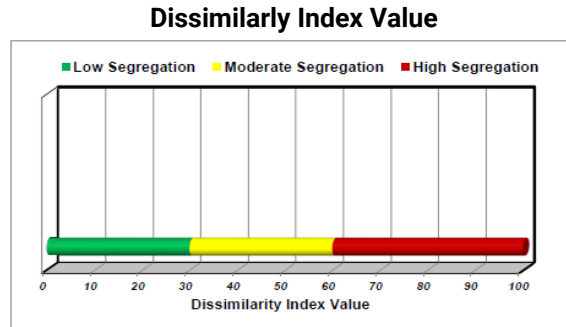


Figure 12: Dissimilarity Index

### Dissimilarity Index Formula

**Index of Dissimilarity Formula**

$$D = 100 * 0.5 * \sum | P_{xi}/P_x - P_{yi}/P_y |$$

Where:

- D** = the index of dissimilarity for two groups being compared within a specific geographic area
- P<sub>xi</sub>** = the population of group x in census tract i
- P<sub>x</sub>** = the total population of group x in the overall geographic area
- P<sub>yi</sub>** = the population of group y in census tract i
- P<sub>y</sub>** = the total population of group y in the overall geographic area
- Σ** = the Greek letter "sigma" indicating the summation of terms

Figure 13: Dissimilarity Index Formula

The largest change in DI from 2000 to 2010 are Asian to Hispanic. This segregation measure increased by from 39.2 to 45.6 percent over 10 years, which represents 6.4 percent change. This can be interpreted as meaning that in 2010; approximately 6 percent of Hispanics would need to move to Black/African American areas in order for an even racial distribution, which would eliminate the segregation in the region.

The groups that had the least change from 2000 to 2010 are Black to Asian from 62.4 to 61.2 percent. In fact, the DI only decreased by 1.2%. White to Hispanic decreased 2.20%, White to Black decreased 5.5%, and Black to Hispanic decreased 5.9% while White to Asian increased 4.10%.

Most racial and ethnic groups measured with DI remained between 30 < DI < 60 which is commonly described as modestly segregated. However, the segregation measurement of

Black to Hispanic in 2010 fell from 57.1 to 51.4 and White to Black 63.9 to 58.4, which classifies their relationship as low segregation.

**Dissimilarity Index Chart**

	White to Black	White to Asian	White to Hispanic	Black to Hispanic	Black to Asian	Asian to Hispanic
<b>1980</b>	76.9	34.5	30.3	62.5	78	29
<b>1990</b>	66.3	42.5	35.3	60.9	66.8	29.4
<b>2000</b>	63.9	45.3	51.6	57.3	62.4	39.2
<b>2010</b>	58.4	49.4	49.4	51.4	61.2	45.6

Table 14 Dissimilarity Index Chart:

Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019  
<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>

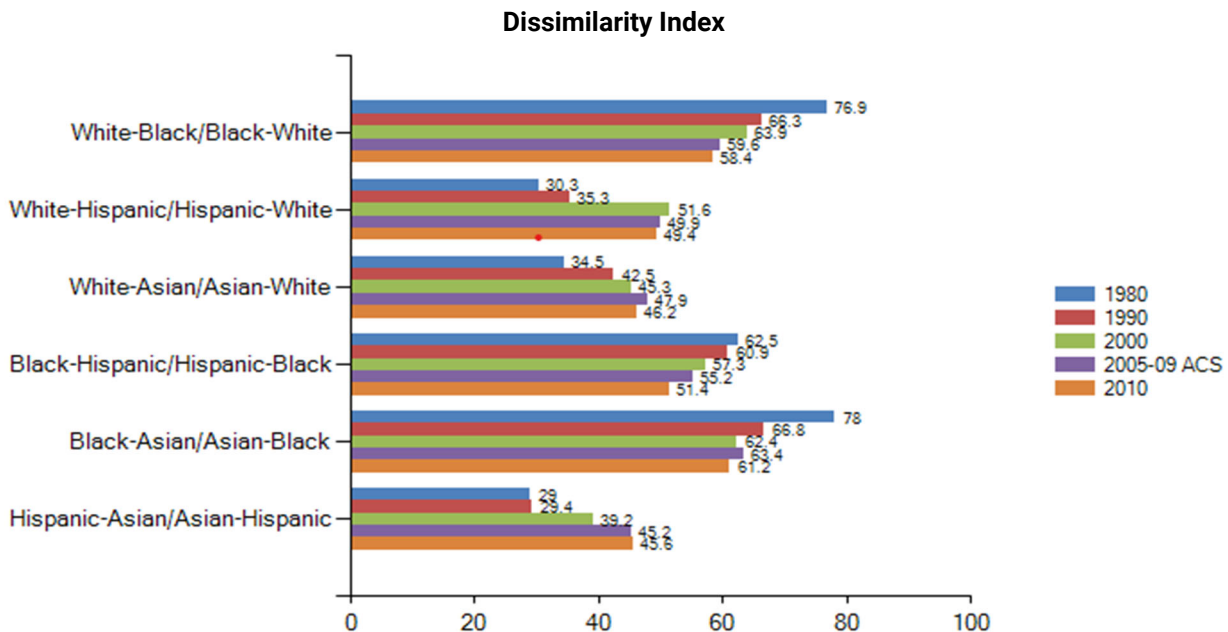


Figure 14: Dissimilarity Index

Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019  
<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>

As the County continues to grow and diversify, it will be important to monitor the segregation of certain groups to each other. The chief concern being that once Whites are no longer considered a statistical majority within the County, will the segregation between current minority groups improve based on the increased numbers or will those persons decide to live in neighborhoods with persons of similar race and ethnicity?

## Exposure Index

The Exposure Index (EI) refer to the racial/ethnic composition where the average member of a given group live or share communal areas. Exposure measures the degree of potential contact, or possibility of interaction, between minority and majority group members. This measure will show the degree of average segregation that minority group members may experience. The EI is the probability that a minority resident will come into contact with a majority resident, higher values represent more exposure and therefore lower segregation.

For example, the average Hispanic in some metropolis might live in a tract that is 40% Hispanic, 40% Non-Hispanic-White, 15% Black, and 5% Asian. (Note that these various indices must add up to 100%.) These are presented below in two categories: exposure of the group to itself (which is called the Index of Isolation) and exposure of the group to other groups)

### Exposure Index Chart

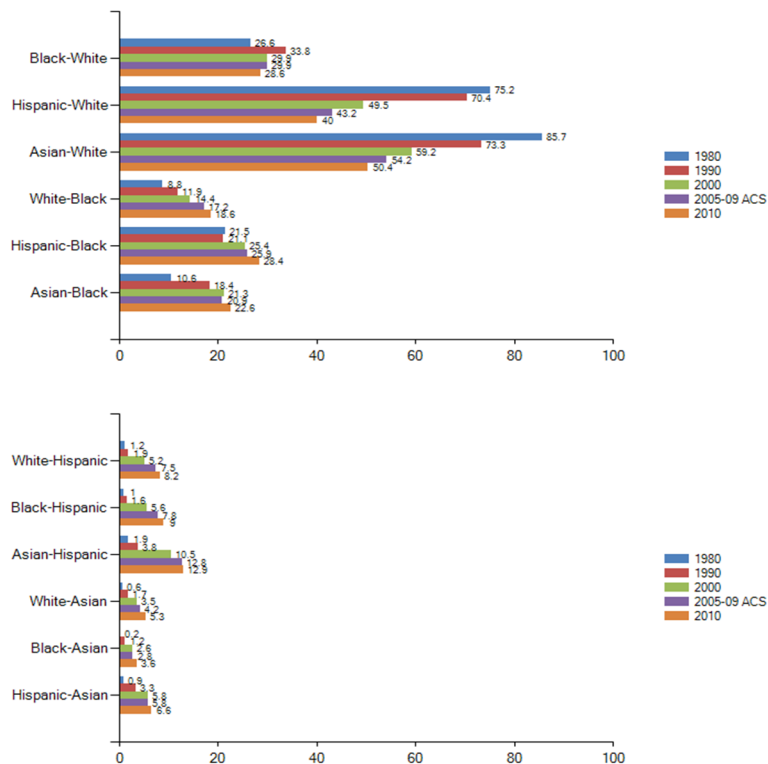
Exposure Index			
Interacting Groups	2000	2010	Change
Black-White	29.9	28.6	-1.3
White-Black	14.4	18.6	4.2
Asian-White	59.2	50.4	-8.8
White-Asian	3.5	5.3	1.8
Hispanic-White	49.5	40	-9.5
White-Hispanic	5.2	8.2	3
Asian-Black	21.3	22.6	1.3
Black-Asian	2.6	3.6	1
Hispanic-Black	25.4	28.4	3
Black-Hispanic	5.6	9	3.4
Hispanic-Asian	5.8	6.6	0.8
Asian-Hispanic	10.5	12.9	2.4

Table 15: Exposure Index Chart

Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019  
<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>



## Exposure Index



Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019  
<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>

It is important to note that the EI is not “symmetrical” so the probability of a typical Black person meeting a White person in a tract is not the same as the probability of a typical White person meeting a Black person in that same tract. An illustrative example of this asymmetry is to imagine a census tract with many White residents and a single Black resident. The Black resident would almost always see White residents, but not every White resident would see always a Black resident. Each group would see a much different world with respect to group identification.

The maximum value of the EI depends both on the distribution of racial and ethnic groups and on the proportion of minorities in the area studied. The value of this index will be highest when the two groups have equal numbers and are spread evenly among tracts (low segregation). If a minority is a small proportion of a region’s population, that group tends to experience elevated levels of exposure to the majority regardless of the level of evenness.

The “Exposure Index” table shows that in 2010 the typical probability of a Black person in Gwinnett County interacting with a White person was 28.6%, while the probability of a White person interacting with a Black person was lower at 18.6%. This probability can also be interpreted to mean that, on average, 28 of every 100 people a Black person met was White and 18 of every 100 people a White person met was Black.

For Hispanic residents, in 2010 the probability of a Hispanic person interacting with a White person is 40%, while the probability of a White person interacting with a Hispanic person is 8.2%. That is a significant difference. The same can say for a Hispanic person interacting with a Black person is 28.4%, while the probability of a Black person interacting with a Hispanic is 9%. The probability of Asian interacting with White is 50.4%. While the probability of a White person interacting with an Asian person is 5.3%. There have been a drastic decreased of an Asian person interacting with a White person from 2000 to 2010 by 8.8%. According to the EI chart, it is less likely of a White person interacting with a minority class.

### **Isolation Index**

The Isolation Index (II) is the percentage of same-group population where the average member of a racial/ethnic group lives. It has a lower bound of zero (for a small group that is quite dispersed) to 100 (meaning that group members are entirely isolated from other groups). This index is affected by the size of the group. The isolation index is a measure of the probability that a member of one group will meet or interact with a member of the same group. The isolation index can be viewed more as a measure of sociological isolation.

Similar to the EI, this index describes the average neighborhood for racial and ethnic groups. It differs in measuring social interaction with others of the same group instead of other groups. The II is a region-level measure for each race/ethnicity summed up from tracts within the region. The II can be interpreted as a probability that has a lower bound meaning low segregation to high segregation implying that group members are entirely isolated from other groups.

The Isolation Index values below show Whites are moderately isolated, in effect segregated, from other racial and ethnic groups. In 2000, the average White resident lived in a tract that was 76.2% White, while dropping to 67.2% by 2010 a 9 % decrease.

Isolation for Hispanics shows an increase in the index value from 18.4% in 2000 to 24.3% in 2010. That is a 5.9% increase. Same for Asian population. There has been a 5.2 % increase in population, 8.2 % in 2000 to 13.4% in 2010. Hispanic and Asian population growth over that time-period likely resulted in settlement patterns that created enclaves.

Isolation index values for Blacks decrease in the index value from 61.2% in 2000 to 58.1 % in 2010. A 3.1% reduction.

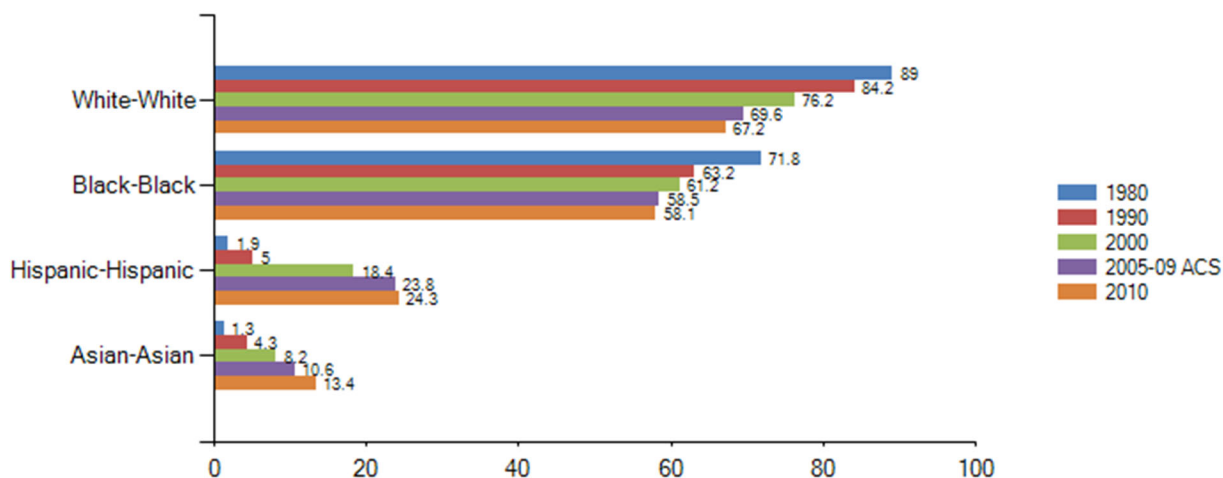
**Isolation Index Chart**

Isolation Index				
Group	1980	1990	2000	2010
White-White	89	84.2	76.2	67.2
Black-Black	71.8	63.2	61.2	58.1
Hispanic-Hispanic	1.9	5	18.4	24.3
Asian-Asian	1.3	4.3	8.2	13.4

Table 16: Isolation Index Chart

Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019  
<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>

**Isolation Index**



Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019  
<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>

### Entropy Index

Entropy, a mathematical concept based on the spatial evenness of the distribution of population groups, can be used to calculate diversity among racial and ethnic groups in a geographical area.

Both the Dissimilarity Index and Exposure Index can only measure the segregation of two groups relative to each other, but the Entropy Index has the advantage of being able to measure the spatial distribution of multiple racial and ethnic groups simultaneously.

The EI measures unevenness in the distribution of multiple racial and ethnic groups in a region by calculating the difference in entropy between census tracts and the larger region as a whole. The Entropy Index for a region is the weighted average variation of each tract’s entropy score differenced with the region-wide entropy as a fraction of the region’s total entropy.

The EI ranges between  $H = 0.0$  when all tracts have the same composition as the entire region (minimum segregation) to a maximum of  $H = 1.0$  when all tracts contain one group only (maximum segregation). Regions with higher values of  $H$  have less uniform racial distributions and regions with lower values of  $H$  have more uniform racial distributions.

The Entropy Index gives the result of an entropy calculation for Gwinnett County. From 2000-2010 EI remained relatively constant, moving from 0.12 to 0.13.

**Entropy Index Chart**

Entropy Index			
	2000	2010	Change
<b>Gwinnett County</b>	0.12	0.13	0.01

*Table 17: Entropy Index Chart*

*Source: 2010 and 2000 U.S. Census Bureau Summary File 1, Accessed August 27, 2019.*

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

This method of entropy analysis indicates that across the major racial and ethnic groups (Whites, Blacks, and Hispanics), regional diversity changed little over the 2000 to 2010 period.

The Entropy Score is not a true measure of segregation because it does not assess the distribution of racial and ethnic groups across a region. A region can be diverse if all minority groups are present but also highly segregated if all groups live entirely in their own neighborhoods (or census tracts). However, Entropy Scores (measures of tract-level diversity used to calculate the Entropy Index) measures the distribution of multi-group diversity across tracts and an entire region, which coincides with the largest concentration of Hispanic residents.

The Diversity Index Chart below, shows the results of the region-wide tract-level calculations of the Entropy Score as a measure of diversity from 1980-2010. The diversity index has risen dramatically from 2000 to 2010 by 55.5% due to the drastic increase in population.

## Diversity Index Chart

Ethnic and racial composition							
	Diversity Index	Total Population	Non Hispanic White	Non Hispanic Black	Hispanic	Asian	Other Races
1980	13.4	166,903	160,050 95.9%	4,070 2.4%	1,426 0.9%	900 0.5%	457 0.3%
1990	28.4	352,910	315,548 89.4%	17,971 5.1%	8,470 2.4%	10,115 2.9%	806 0.2%
2000	28.4	588,448	394,164 67.0%	76,837 13.1%	64,137 10.9%	42,391 7.2%	10,919 1.9%
2010	83.9	805,321	354,316 44.0%	184,122 22.9%	162,035 20.1%	85,106 10.6%	19,742 2.5%

Figure 15

*Source: Spatial Structures in the Social Sciences, Brown University, August 27, 2019*

<https://s4.ad.brown.edu/projects/diversity/segregation2010/msa.aspx?metroid=12060>

### Reconciliation of the Four Segregation Indices

One important question remains – has the overall racial and ethnic segregation in Gwinnett County worsened, improved, or remained neutral about the same between 2010 - 2018. The four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation used in this analysis allow for a possible consensus answer.

This Segregation Analysis has shown that, overall, segregation between White, Black, Asian, and Hispanic residents in Gwinnett County are relatively low and continue to decrease as the minority population of Gwinnett County continues to grow.

## Housing Profile

Affordability is a significant factor for Gwinnett County residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30% of a family's monthly gross income. Households that spend over that threshold may be significantly cost burdened and have difficulty affording necessities.

Yet, according to HUD, more than 12 million renters and homeowners nationally spend more than 50% of their income on housing and a family with one full-time worker earning the minimum wage cannot afford the local fair-market rent for a two-bedroom apartment anywhere in the United States. HUD's definition of "affordable housing" includes housing-related expenses such as rent and utilities.

On an annual basis, HUD calculates median family income for metropolitan statistical areas (MSAs) across the country, including the Atlanta-Sandy Springs-Marietta MSA, which includes Gwinnett County. The categories include extremely low-income (earning less than 30% of the MFI), very low-income (earning between 30% and 50% of the MFI), and low-income (earning between 50% and 80% of the MFI). The U.S. Census Bureau prepared a special tabulation of Median Family Income (MFI) estimates from the 2012-2016 5-year ACS. HUD uses this data as the basis for calculating FY2019 MFIs. According to HUD's calculation, the 2019 MFI for the greater metropolitan area is \$79,700.00. According to the 2013 – 2017 ACS 5 Year Estimate, the MFI for households in Gwinnett County is \$72,804.00 making Gwinnett County's MFI is 8% lower than the FY 2019 MFI for the MSA. This poses a challenge when families are seeking affordable housing.

Housing needs change over time as the size, composition of the population evolves, and housing preferences shift. Different social and economic factors may influence whether families choose to rent or buy, construct new homes or renovate old homes. Family size, householder age, and economic status influenced the size and type of homes needed.

Household income and purchasing power can limit housing choices and the lack of affordable housing availability only further compounds the issue. The following section of this Analysis will present a housing profile for Gwinnett County and will include various housing statistics related to single family and rental housing.

### **Housing Stock**

Table 28 shows that over 73.2% of Gwinnett County's housing stock is single-unit, detached housing, with small multi-family developments coming in second at 6.55%, followed closely by single-unit, attached homes at 5.44%. The majority of Gwinnett County's multi-family

structures contain between 10 and 19 units. Multi-family structures total 50,123 units compared to 247,388 single-family units. There are also a combined 4,646 mobile home, boat, recreational vehicle, and van housing units.

**Number of Units in Structure**

<b>UNITS IN STRUCTURE</b>	<b>Number</b>	<b>Percent</b>
<b>Total housing units</b>	302,157	100.00%
<b>1-unit, detached</b>	221,449	73.29%
<b>1-unit, attached</b>	16,424	5.44%
<b>2 units</b>	3,653	1.21%
<b>3 or 4 units</b>	5,862	1.94%
<b>5 to 9 units</b>	15,262	5.05%
<b>10 to 19 units</b>	19,778	6.55%
<b>20 or more units</b>	15,083	4.99%
<b>Mobile home</b>	4,445	1.47%
<b>Boat, RV, van, etc.</b>	201	0.07%

*Table 18: Number of Units in Structure*

Source: 2013 -2017 ACS 5-year estimate, Accessed August 26, 2019.  
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

There have been significant trends in development over the past 5 years. While, many of Gwinnett County’s multi-family structures contain between 10 and 19 units, the number of new multi-family structures containing between 10 and 19 units has only increased by less than 1%. In the last five years, multi-family structures containing five to nine units experienced the largest decrease, with 803 units lost. Meanwhile, multi-family structures containing 20 or more units increased by 757 units. This is an indication that housing development is changing towards more large-scale residential projects.

In 1990, when Gwinnett County’s population began to grow, a similar growth pattern was evident within the County. By the year 2000, there were over 200,000 housing units in Gwinnett County. From 2000 to 2010, Gwinnett County population increased by 216,873 and its housing stock increased by 81,865. From 2010 to 2017, ACS estimates Gwinnett County’s population has increased by 84,633 people conversely its housing stock increased by only 10,610. From 2000 to 2010, for every new unit created 2.65 people could potentially be housed; but from 2010 to 2017, it is estimated that for every new unit created 7.98 people could potentially be housed. This increase underscores the fact that Gwinnett County’s population is increasing more rapidly than the increase in new housing stock.

## Occupancy

In 2000, Gwinnett County was undergoing one of the largest population migrations in the entire country. Private developers constructed new houses daily and new residents of Gwinnett County purchased them just as quickly. The vacancy rate in 2000 was 3.5% and all economic indicators pointed toward a stable and prosperous future for Gwinnett County. When the housing crisis started in 2007, banks began to foreclose on these homes. By 2009, Gwinnett County was second only to Fulton County for notices of foreclosure notices issued to residents. In fact, 23,205 foreclosure notices representing over 11% of all housing units were issue in 2009.

Unfortunately, as a direct result of the recent foreclosure crisis, the vacancy rate in Gwinnett County more than doubled. There were 15,663 additional properties vacant in 2010 compared to 2000. The foreclosure crisis ended in 2009, but the ramifications of the crisis were still being felt in jurisdictions across the country including Gwinnett County. In 2014, Gwinnett County was able to announce for the first time in five years that the tax digest was growing due to an increase in sales prices and an end to high volume foreclosure activity within the County. This allowed property appraisals to raise in value and generate more money through annual property tax payments.

According to ACS estimates, between 2013 and 2017, Gwinnett County has experienced several gains. There was an estimated 3.26% increase in total housing units. Additionally, a 2.5% reduction in vacant housing units, from 8.77% to 6.26%.

Table 19: *Occupancy Rates*

2013 - 2017 ACS 5-Yr Estimate		2009 - 2013 ACS 5-Yr Estimate	
<b>Total housing units</b>	302,157	<b>Total housing units</b>	292,629
<b>Occupied housing units</b>	283,256 (93.74%)	<b>Occupied housing units</b>	266,952 (91.23%)
<b>Vacant housing units</b>	18,901 (6.26%)	<b>Vacant housing units</b>	25,677 (8.77%)

Source: 2013 and 2017 ACS 5-year estimates, Accessed August 26, 2019.  
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

## Housing Conditions

Over 57% of Gwinnett County's current housing stock was built between 1990 and 2009, and over 94% was built after 1970. With 94% of Gwinnett County's housing units being between 20 and 40 years old, many of these homes are either starting to need, or will soon need, major repairs. As houses age, annual maintenance costs rise which adds additional cost burden for naturally occurring affordable housing.



### Gwinnett County - Homes Built by Year

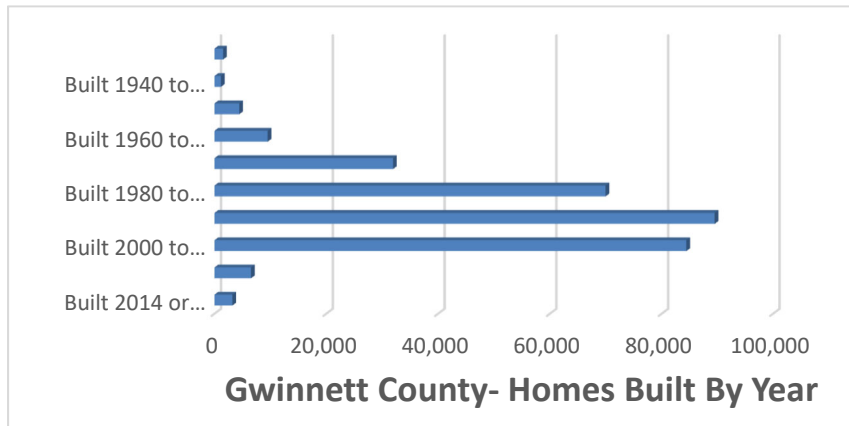


Figure 16: Homes Built by Year

Source: 2017 ACS 5-year estimate, Accessed August 26, 2019. <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Cost burden can become an even greater issue when assessing the recent rise in home values in Gwinnett County. As Gwinnett County’s housing stock has continued to age and become more costly to maintain, home values have also increased as the market has rebounded. Because of this increase in home values, rental rates have increased widening the cost-burden gap.

### Value of Homes in Gwinnett County by Percentage

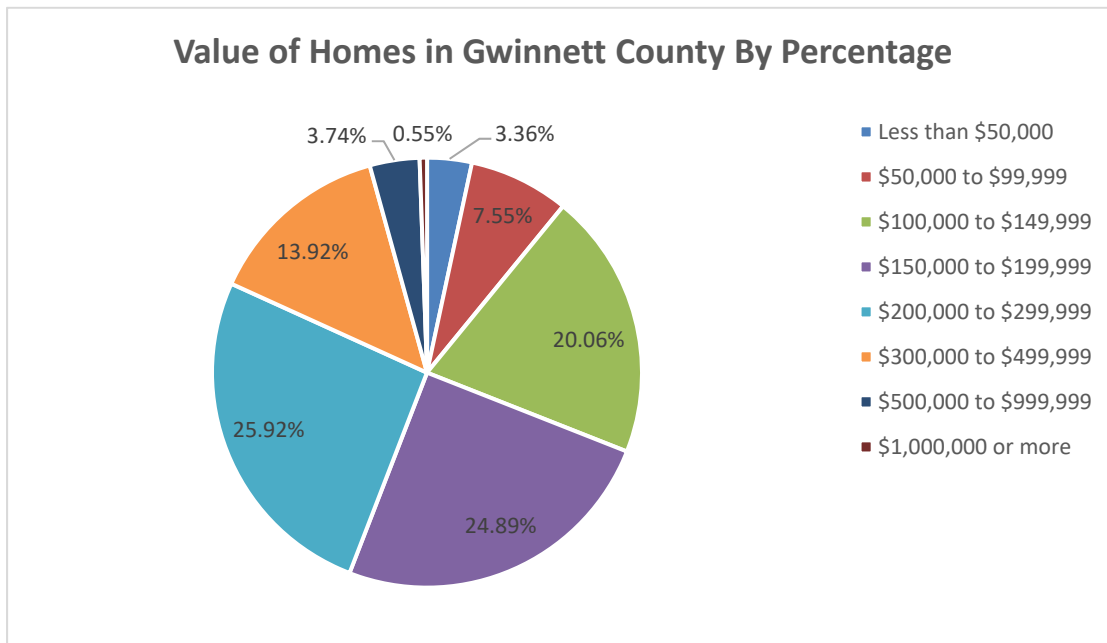


Figure 17: Value of Homes in Gwinnett County by Percentage

Source: 2008 – 2012 ACS 5 Year Estimate, Gwinnett County, DP04 Selected Housing Characteristics, Accessed April 20, 2014, <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

While the foreclosure crisis ended nationally in 2009, locally the effects affected the County through 2013. In 2013, home prices bounced back and produced the highest median sales price since 2010. Between 2013 and 2018, median home values have risen to a median value of \$185,200. This represents a 45.48% increase. In addition, owner occupied units valued between \$500,000 and \$999,999, had a 28.42% increase, while owner occupied units valued between \$100,000 and \$199,999 experienced an 8.08% reduction.

Increases in property values, while a positive sign for the economy and the housing market in general but can also lead to affordability issues in the renter market. The increase in value also makes it increasingly more difficult to develop new affordable housing. Often, low-income families are forced into substandard housing that is aging and in need of repair because it is the only housing that is affordable to their income.

### Estimated Home Values

2008 – 2012 ACS Estimate Home Values Gwinnett County		
Specific Owner-Occupied Units	188,529	100%
Less than \$50,000	6,344	3.36%
\$50,000 - \$99,999	14,232	7.55%
\$100,000 - \$149,999	37,828	20.06%
\$150,000 - \$199,999	46,926	24.89%
\$200,000 - \$299,999	48,860	25.92%
\$300,000 - \$499,999	26,237	13.92%
\$500,000 - \$999,999	7,059	3.74%
\$1,000,000 or more	1,043	0.55%
Median Value	\$185,200	

Table 20: Estimated Home Values

Source: 2013 – 2017 ACS 5 Year Estimate, Gwinnett County, Accessed August 26, 2019, <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

### Home Sales by Year

	2014	2015	2016	2017
Number of Home Sales	16,075	16,687	19,130	16,949
Median Sales Price	\$165,000.00	\$182,000.00	\$197,000.00	\$210,000.00

Table 21: Home Sales by Year

Source: Policy Maps, Gwinnett County, GA, Accessed on August 26, 2019. <http://www.policymaps.com>

Increases in median sales prices is another positive sign for the economy and the housing market in general. In Gwinnett County, rises in median sales prices are leading to more trouble building and developing affordable housing and is limiting access to affordable housing.

### Cost Burden

Cost burden occurs when a household has gross housing costs that range from 30% - 49.9% of gross household income. Severe cost burden occurs when gross housing costs represent 50% or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges, but does not include the costs of home maintenance. Given the age variation of housing stock in the region, the home maintenance and repair costs associated with older construction can add significant additional housing cost burden.

As indicated in the following Affordability Snapshot tables, Gwinnett County has a significant percentage of homeowners and renters spending more than 30% of their annual household income on housing related costs. According to 2013-2017 American Community Survey (ACS), 29.1% of homeowners with a mortgage spend more than 30% of their income on monthly housing costs. Conversely, only 10.9% of homeowners without a mortgage expended more than 30% of their income on monthly housing costs, while 47,600 (52.3%) of renter households in Gwinnett County expended 30% or more of their income on rent. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME (SMOCAPI)		
<b>Housing units with a mortgage (excluding units where SMOCAPI cannot be computed)</b>	144,170	144,170
Less than 20.0 percent	64,642	44.80%
20.0 to 24.9 percent	21,091	14.60%
25.0 to 29.9 percent	15,647	10.90%
30.0 to 34.9 percent	10,175	7.10%
35.0 percent or more	32,615	22.60%
<b>Housing unit without a mortgage (excluding units where SMOCAPI cannot be computed)</b>	42,912	42,912
Less than 10.0 percent	22,210	51.80%
10.0 to 14.9 percent	7,938	18.50%

15.0 to 19.9 percent	4,564	10.60%
20.0 to 24.9 percent	2,102	4.90%
25.0 to 29.9 percent	1,434	3.30%
30.0 to 34.9 percent	1,147	2.70%
35.0 percent or more	3,517	8.20%
<b>GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME (GRAPI)</b>		
Occupied units paying rent (excluding units where GRAPI cannot be computed)	91,049	91,049
Less than 15.0 percent	8,343	9.20%
15.0 to 19.9 percent	12,227	13.40%
20.0 to 24.9 percent	11,653	12.80%
25.0 to 29.9 percent	11,226	12.30%
30.0 to 34.9 percent	8,531	9.40%
35.0 percent or more	39,069	42.90%

*Table 22: Cost Burden*

Source: 2013 – 2017 ACS 5 Year Estimate, Gwinnett County, Accessed August 26, 2019, <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

## Examining the Rental Market

The National Low Income Housing Coalition’s “Out of Reach” 2019 Annual Report calculates the amount of money a household must earn in order to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD’s affordability standard of paying no more than 30% of income for housing costs.

According to the report, a person would need to work 102 hours per week or earn at least \$38,640 annually to afford a one-bedroom rental unit. However, the mean renter wage is only \$36,046 annually and the rent affordable to this wage is \$901 leaving a deficit in wages earned to afford housing. However, the fair market rent for a one-bedroom apartment is \$966 and the availability of rental units at this rate is limited. The number of people work in the lowest paying jobs, which further highlights the growing affordability issue.

Slightly less than one-half (42.90%) of Gwinnett County renters spend more than 35% of their monthly income on rent, based on the 2013-2017 ACS Estimates. When compared to statewide data, 41.38% of renters across the state spend more than 35% of their monthly income on rent. However, the median rental cost statewide was \$927 while in Gwinnett County it was \$1,142, which represents a \$215 difference between the two. Also, during the same period, renters across the state saw an increase in rent of 9.19% moving from \$849 to \$927. Renters across Gwinnett County saw an increase in rent of 15.59% moving from \$988 to \$1,142.

This difference may be seen by examining the Median Household Income and identifying that for the State of Georgia the median income is \$52,977 compared to \$64,496 in Gwinnett County. However, higher than average rents further increase the strength of the impediment and limit the options of a low-income renter who needs affordable housing and potentially forces them to consider substandard housing.

The table below details out of the findings from the 2019 Out of Reach report as applied to the State of Georgia, the Atlanta-Sandy Springs-Marietta MSA, and Gwinnett County.

### 2019 Out of Reach Report Findings

Household Characteristics	2019 GA	2019 Gwinnett County	2019 Atlanta-Sandy Springs-Marietta GA HUD Metro FMR Area
<b>Annual Income Needed to Afford FMR</b>			
1 Bedroom	\$32,861	\$38,640	\$38,640
2 Bedroom	\$38,319	\$44,240	\$44,240
3 Bedroom	\$50,313	\$57,080	\$57,080
4 Bedroom	\$60,906	\$70,080	\$70,080
<b>Housing Wages Needed to Afford FMR</b>			
1 Bedroom	\$15.80	\$18.58	\$18.58
2 Bedroom	\$18.42	\$21.27	\$21.27
3 Bedroom	\$24.19	\$27.44	\$27.44
4 Bedroom	\$29.28	\$33.69	\$33.69
<b>Work Hours per Week at Minimum Wage to Afford FMR</b>			
1 Bedroom	87	102	102
2 Bedroom	102	117	117
3 Bedroom	133	151	151
4 Bedroom	162	186	186
<b>Full Time Jobs Needed at Minimum Wage to Afford FMR</b>			
1 Bedroom	2.17	2.55	2.55
2 Bedroom	2.55	2.925	2.925
3 Bedroom	3.32	3.775	3.775
4 Bedroom	4.05	4.65	4.65

Table 23: Out of Reach Report Source: National Low-Income Housing Coalition, "Out of Reach" 2019 Annual Data, <http://www.hlihc.org/>

The "Out of Reach" study concluded that in 2019 there is a need for more affordable rental housing units in Gwinnett County. Gwinnett County residents who are unable to afford housing in the local area seek assistance from available public housing programs. There are three public housing authorities located within Gwinnett County's more heavily populated cities. Public Housing Authorities are in the cities of Lawrenceville, Buford, and Norcross to meet the needs of the growing numbers of low-income and impoverished residents.

The Georgia Department of Community Affairs administers all Section 8 Housing Choice Vouchers (HCV) based on income eligibility, homelessness, family size, and disability, allowing eligible applicants to seek affordable housing in a location of their choice that

accepts housing vouchers. Waiting lists for vouchers are common and make take years for an applicant to receive assistance.

## Zoning Analysis

Comprehensive land use planning is an integral tool by which governments address the interconnection and complexity of their respective jurisdictions. Community decisions on land use can have a rippling affect and profound impact on affordable housing and fair housing choice for the entire community. Environmental hazards, noise elevation, property value, and traffic are some of the effects of land use decisions that form the character of a community.

Local governments utilize zoning codes to control and manage land usage in a community. These codes often define the scope and density of housing resources available to residents, developers, and other organizations. While zoning codes play an important and much needed role in regulating health and safety, overly restrictive codes can negatively affect fair housing choice within a jurisdiction. Examples of zoning provisions that most result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any form of housing, particularly multi-family housing, or require larger lot sizes that deter affordable housing development.
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit.
- Placing administrative and sizing constraints on group homes.
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing.
- Restrictions on occupancy of accessory housing structures such as carriage homes or basement units.
- Unnecessary or lengthy permit, application, or appeal procedures.

Zoning codes present a crucial area of analysis for a study of impediments to fair housing choice. The jurisdiction municipal zoning codes for Gwinnett County were obtained and reviewed against a set of fair housing issues. For each issue, the ordinance was assigned a risk score, with the possible scores defined as follows:

- 1 = low risk – this provision does not pose a significant risk for discrimination or limitation of fair housing choice;



- 2 = medium risk – this provision is neither the least permissive nor the most restrictive; it very well could interfere with fair housing choices although its effect is likely not widespread;
- 3 = high risk – this provision causes or has significant potential to cause systematic and widespread housing discrimination.

The risk scores were compiled to indicate the probability of the County’s zoning ordinance impact on fair housing and its propensity to limiting fair housing choice. Gwinnett County’s average total risk score is 1.66, which means that the County’s zoning code is low-risk and posing low risk for discrimination or limitation of fair housing choice.

### **Familial Status**

One of the most scrutinized provisions of any zoning code is its definition of “family.” Ideally, the definition does not unreasonably restrict the numbers of unrelated individuals permitted to live together in a single dwelling. The County does restrict how family is defined within their code. This limitation can affect housing choices that low-income individuals make by not allowing them to live in a home with other unrelated individuals where living costs could be reduced by sharing housing costs. Low-income individuals that cannot afford to live in an area with restrictions may seek to live elsewhere to afford lower living costs.

### **Fair Housing**

For all the zoning ordinances that were studied, - *Does the zoning ordinance include a discussion of fair housing*- received the highest average risk score of 2.00. This indicates the lack of inclusion of fair housing within the zoning ordinances. While the impact of fair housing is not necessarily widespread throughout the County in limiting choice to fair housing, it is important to note that mentioning fair housing and its laws is a simple but effective tool to include within zoning ordinances. Doing so indicates the jurisdiction understands its significance and importance to overall housing choices and regulations.

### **Senior Housing**

Gwinnett County’s zoning address senior citizens to access housing without the use of a special permit or application. This issue received the lowest risk score; Thus, senior citizens are unimpeded by an unnecessary or complicated permit or application process. These processes can sometimes stretch on for extended periods and discourage potential home seekers. A person seeking to develop senior housing would choose to look elsewhere to build senior housing if this issue had been a higher score.

## **Disability**

Requiring a special-use permit can cause similar frustrations by leading to a lengthy permit process that is not required for others seeking housing. Restricting disabled individuals to certain housing areas can cause individuals to have difficulty finding the housing they wish to live in. Overall, these issues can limit the individual with disabilities' access to fair housing by limiting their ability to live anywhere they choose in Gwinnett County.

## **Group Homes**

During the initial public comment period for this analysis, there was concern expressed by a number of stakeholders about the way different jurisdictions approached the issue of group homes and shelters. Multiple stakeholders expressed concerns about the ability to develop group homes in certain parts of the County due to the restrictions on, not just the kind of development that was required, but also on where those residential use facilities could be located. After a review of all the zoning ordinances within the County, it was scored a medium risk on this issue. The County only allows these types of units by applying for a Special Use Permit.

## **Summary**

Gwinnett County scored 1.6 on all issues studied under the 18 questions used. The bulk of Gwinnett County's zoning ordinances do not restrict fair housing choice - thus allowing individuals to live where and how they choose. These zoning codes allow individuals, whether seniors, disabled, or not, the same access to housing as everyone else. It should be noted that this analysis of Gwinnett County's zoning ordinances is highly generalized. Therefore, it is important to view the analysis as an overall sense of the zoning ordinances for the area but not to assume the scores correctly characterize the County's ordinances.

## **Access to Opportunity**

Access to housing is not only about having a roof over one's head; it also affects access to opportunity, including education and networking opportunities, and proximity to good jobs. Both diminishing regional fortunes and urban revitalization are the result of the new importance of skill-based jobs that provide a base for the expanding knowledge-based economy. These trends raise the questions of whether lower-skill; lower-wage households might lastingly be left out of access to opportunity because of increasing housing costs at the metropolitan level as well as at the local level. At the beginning of the 21st century, the U.S. economy is offering opportunities, but these are increasingly concentrated in cities and neighborhoods within cities that are not accessible to all.

Historically, the convergence of regional income and skill levels occurred through lower-skill workers moving to more productive states was enabled by constant housing costs. Workers who moved could take advantage of higher-paying jobs without having to pay higher housing costs. Since housing supply was elastic in the growing receiving regions. Individuals could move to more productive regions regardless of skill level and expand their own opportunity. Current labor market trends do not follow the historical patterns of convergence. Moretti<sup>8</sup> shows how, in the current labor market, places that already have a high concentration of high-skill workers have become even more productive in recent decades in a trend he calls the “Great Divergence.” However, lower-skilled workers are less able to take advantage of high-growth area job availability because housing costs in these areas are also high.

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools and jobs. This section examines these dimensions geographically relative to locations of RCAP/ECAPs and evaluates levels of access to opportunity by race and ethnicity. To measure economic and educational conditions at a neighborhood level, HUD’s Office of Policy Development and Research developed a methodology to “quantify the degree to which a neighborhood offers features commonly associated with opportunity.”<sup>9</sup>

For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including poverty, school proficiency, labor market engagement, and jobs access, calculated based on the following indices:

- Poverty index – family poverty rates and share of households receiving public assistance;
- Labor market engagement index – employment levels, labor force participation and educational attainment; and
- Job access index – distance to job locations and labor supply levels.
- School proficiency index – school-level data regarding elementary school student performance on state exams;
- Environmental health hazard index - potential exposure to harmful toxins at the neighborhood level.

For each block group, a value is calculated for each index, and results are then standardized on a scale of 0 to 100, based on relative ranking within the metro area (or non-metro balance of the state). For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics. The maps that follow show the HUD-provided opportunity scores for block groups in Gwinnett County for poverty, labor market

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<sup>8</sup> Moretti, Enrico. 2012. *The new geography of jobs*. Houghton Mifflin Harcourt.

<sup>9</sup> HUD Office of Policy Development and Research, “FHEA Data Documentation,” Draft. 2013. p. 4.

engagement, and jobs access. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity. Along with these indices, HUD also developed a methodology that examines access to opportunity for racial and ethnic minorities by determining whether some subgroups tend to live in higher opportunity areas than others. Note that within this section, non-Hispanic populations are referred to by race only (e.g., White, African American, Asian); the Hispanic population includes all races.

The following table presents Opportunity Indicators by Race and Ethnicity. Indicators of opportunity include school proficiency, labor market, transportation, jobs proximity, and environmental health by race and ethnicity and compares the County to the broader region; this data shows the following:

## Opportunity Indicators by Race/Ethnicity

Table 12 - Opportunity Indicators, by Race/Ethnicity									
(Gwinnett County, GA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index		
<b>Total Population</b>									
White, Non-Hispanic	60.32	82.49	64.16	60.96	32.82	47.97	33.94		
Black, Non-Hispanic	49.23	74.42	55.90	66.76	39.11	47.14	30.87		
Hispanic	37.30	69.42	49.45	72.11	48.16	49.18	26.98		
Asian or Pacific Islander, Non-Hispanic	53.98	77.95	61.89	67.85	41.52	53.27	29.39		
Native American, Non-Hispanic	51.88	76.89	57.96	65.60	38.04	47.07	31.01		
<b>Population below federal poverty line</b>									
White, Non-Hispanic	52.26	79.09	58.47	62.84	38.36	49.90	32.38		
Black, Non-Hispanic	42.24	71.60	51.20	69.38	44.75	46.88	29.45		
Hispanic	29.62	66.63	45.05	74.16	51.99	50.93	25.32		
Asian or Pacific Islander, Non-Hispanic	50.33	75.98	58.68	69.22	46.45	55.24	28.50		
Native American, Non-Hispanic	41.42	68.02	55.08	68.59	45.24	40.15	29.83		
<b>(Atlanta-Sandy Springs-Roswell, GA) Region</b>									
<b>Total Population</b>									
White, Non-Hispanic	59.35	66.64	61.52	58.30	34.86	50.04	36.21		
Black, Non-Hispanic	38.43	37.56	41.61	68.30	43.71	45.96	25.33		
Hispanic	38.88	54.39	51.53	70.82	48.30	52.25	27.32		
Asian or Pacific Islander, Non-Hispanic	57.60	66.92	66.71	71.05	45.34	54.69	27.81		
Native American, Non-Hispanic	48.54	54.84	52.00	61.84	39.04	50.20	32.01		
<b>Population below federal poverty line</b>									
White, Non-Hispanic	47.46	59.59	49.82	57.16	36.88	50.47	36.30		
Black, Non-Hispanic	27.64	31.89	33.26	71.42	48.93	47.60	23.24		
Hispanic	28.15	49.46	45.56	73.77	52.50	53.18	25.02		
Asian or Pacific Islander, Non-Hispanic	48.37	58.72	59.53	74.51	52.73	56.83	23.94		
Native American, Non-Hispanic	37.79	50.61	43.25	63.50	42.33	54.17	29.26		
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA									
Note 2: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).									

Table 24: Opportunity Indicators by Race/Ethnicity, HUD AFFH Data

## Poverty Index

The Low Poverty Index provided by the HUD in Table 14 uses rates of family poverty by household to measure exposure to poverty by neighborhood. A higher score indicates less exposure to poverty at the neighborhood level. For this analysis, HUD also provides maps that indicate geographic distribution of the Low Poverty Index by Race/Ethnicity, national origin, and households with children. Lighter shading indicates areas of lower opportunity and darker shading indicates areas of higher opportunity.

Looking at the poverty index, in which lower poverty index scores indicate higher rates of poverty and use of public assistance, there are pockets with high concentrations of residents living below the poverty level, with poverty extremely low index scores, below 10, in the following Census tracts: 503.20 and 504.17 located in Norcross. These areas are primarily concentrated in the southwest areas of the County. These census tracts have the lowest poverty index scores indicating the areas in Gwinnett County with the highest poverty rates. These areas also have large concentrations of racial and ethnic minority residents. Census tract 503.20 is home to 1,114 Hispanic residents and Census tract 504.17 is home to 1,002 Hispanic residents.

A person's place of residence has a significant impact on their exposure to poverty. Even though there are two R/ECAPs Census tracts in the County. One can also identify areas where households that live below the federal poverty level demonstrate trends toward segregation, limited access to opportunities, and one or more housing problems, like cost-burdened conditions.

## Poverty Index by Race/Ethnicity

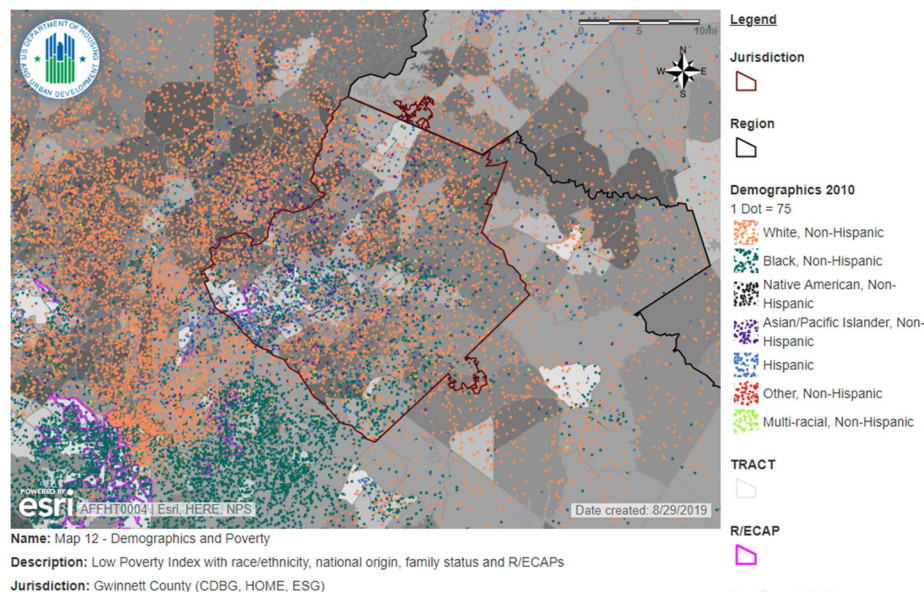


Figure 18: Poverty Index by Race/Ethnicity



## School Proficiency Index

The School Proficiency Index measures the proficiency of elementary schools in the attendance area of individuals sharing a protected characteristic within 1.5 miles of the block-group. The values for School Proficiency Index are determined by the performance of 4th grade students on state exams to describe which neighborhoods have high performing elementary schools nearby, and which are near lower performing elementary schools. The spatial distribution of racial/Ethnicity and national origin groups and families with children, overlaid by shading that shows school proficiency levels for the jurisdiction and the region. In each map, lighter shading indicate areas of lower opportunity and darker shading indicates higher opportunity.

In Gwinnett County, White residents live in neighborhoods with greater access to proficient schools, with the highest school proficiency score of 82.49. The next highest index value is captured by Asian, (77.95), Native American (76.89), and Black (74.42). The Hispanic population has a school-proficiency index value of 69.42, which is more than 13 points lower than the White population.

Analyzing persons living below the federal poverty line within the County, White and Asian populations have the highest value index at 79.09 and 75.98 respectively, showing greater access to neighborhoods with proficient schools. Black and Native Americans have the next highest school proficiency scores at 71.60 and 68.02. Even at lower income level, Hispanic residents maintain the lowest score of 66.63.

At the regional level, with Asian residents fared better with a school proficiency score of 66.64. Next, White (66.64), Native American (54.84), and Hispanic (54.39) residents were assigned a school proficiency index scores ranging from 54.39 to 66.64. Black residents held the lowest score of 37.56. Looking at the population below the federal poverty line, Asians, Whites, Native Americans, and Hispanics have greater access to proficient schools having the highest scores compared to Blacks with the lowest score of 31.89.

The Hispanic population compared to the other racial and ethnic populations in the County have less access to proficient schools; however, they tend to have slightly better access to more proficient schools in the region. Conversely, Black residents have better access to proficient schools at the County level but have poor access to proficient schools at the regional level. White and Asian residents have better access to more proficient schools in both the regional and county level.

Areas of the County that have higher percentage of owner-occupied units and characterized as predominantly White have both a smaller percentage of families with children, and a higher index of access to proficiency schools, compared to other areas.

On the other hand, other racial/ethnic groups such as Blacks, Hispanics, Asians, tend to live in areas of the County where there are high number of aging renter-occupied units and have either moderate or low access to proficient schools according to the access to School Proficiency Index provided by HUD.

Gwinnett County is served by the Gwinnett County Public Schools, the state's largest schools district and is rated among the best in the country. It is evident that Gwinnett County schools are proficient given that even the lowest proficiency index for the County is higher than the highest school proficiency index for the region. For example, where census blocks exhibit high concentrations of low-income, Hispanic children and are all assigned to the same school zone, this disproportionate ratio impacts overall school performance, as measured by state exam scores.

## School Proficiency Index and Race/Ethnicity

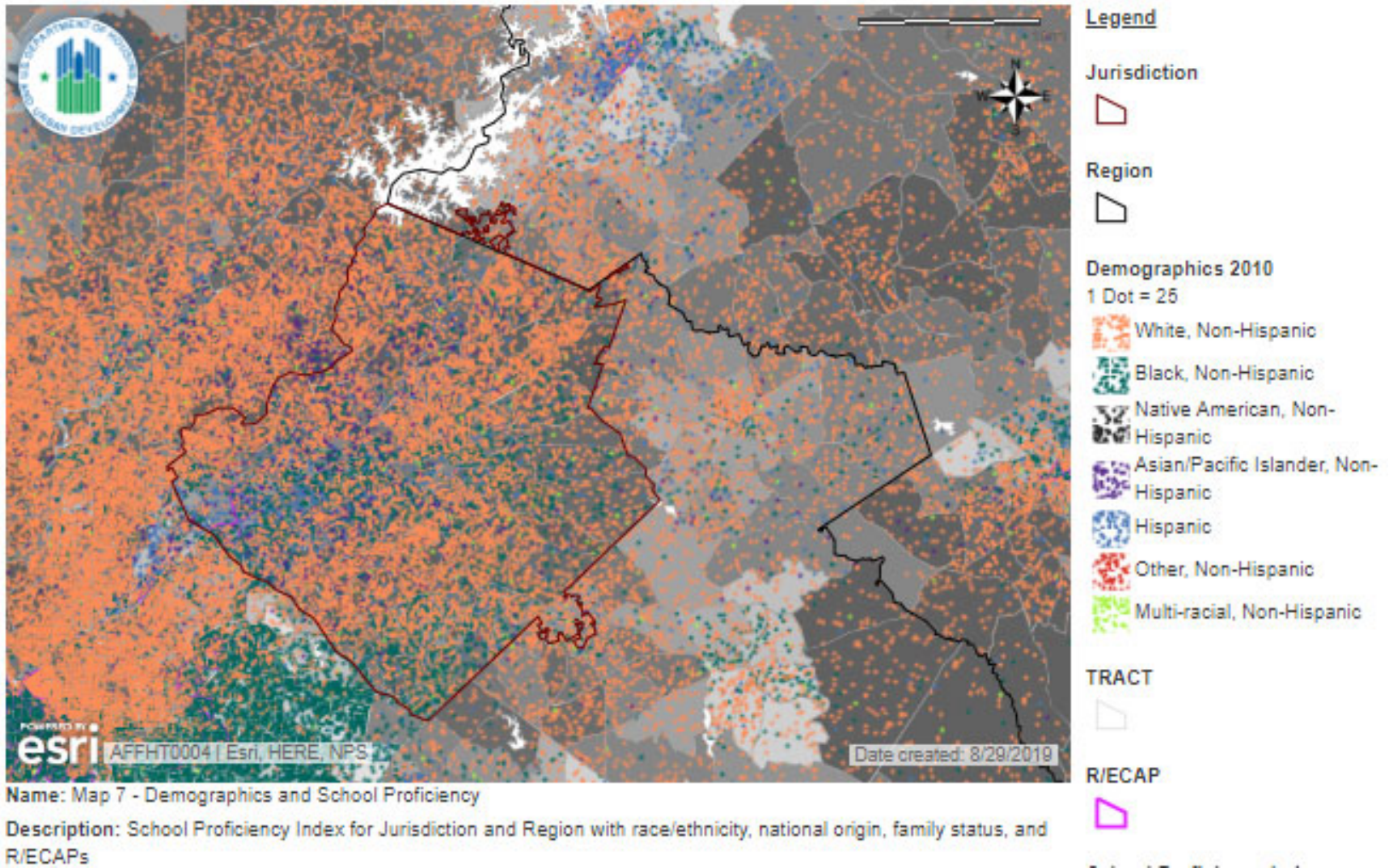


Figure 19: School Proficiency



Figure 20 - School Proficiency Index and National Origin

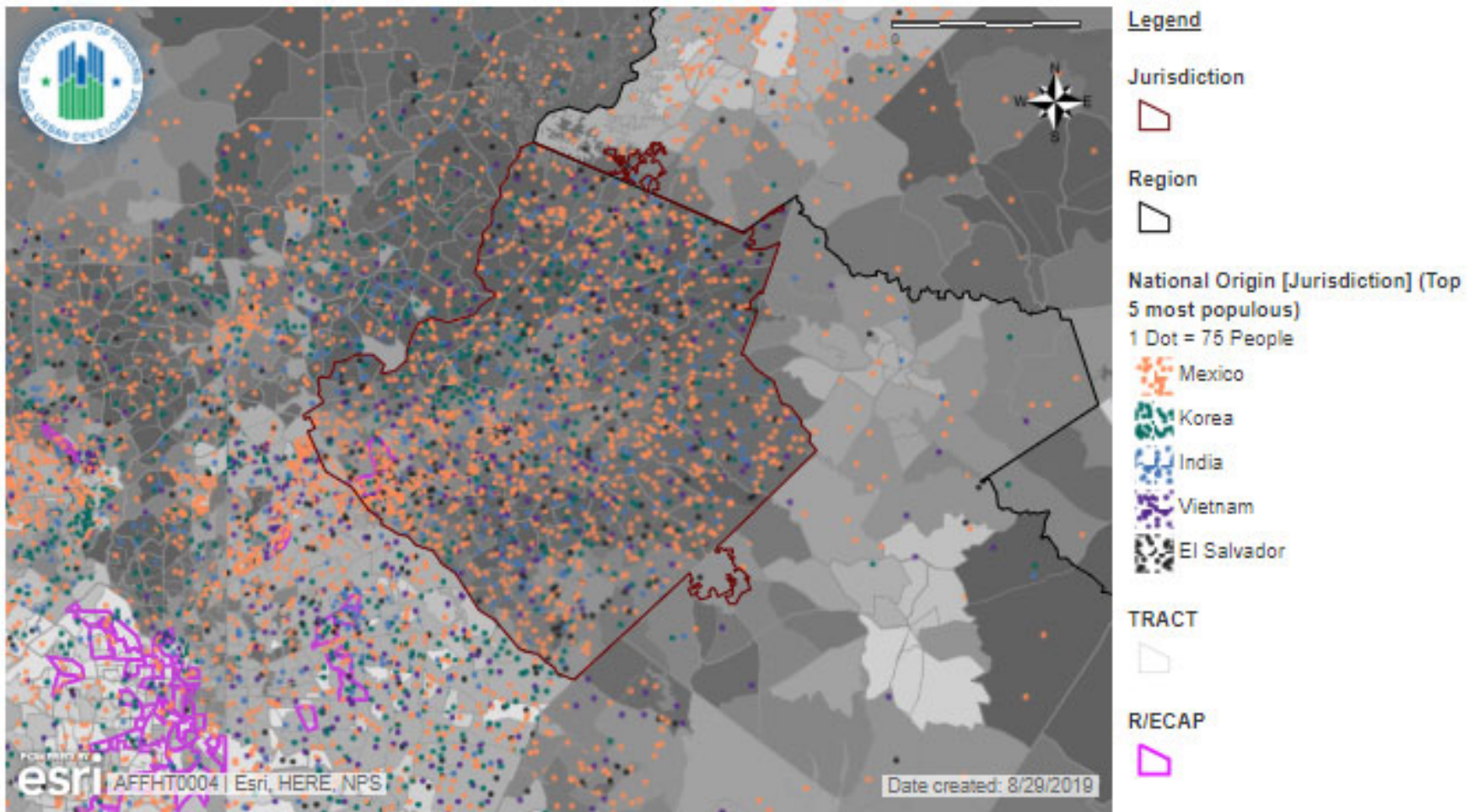
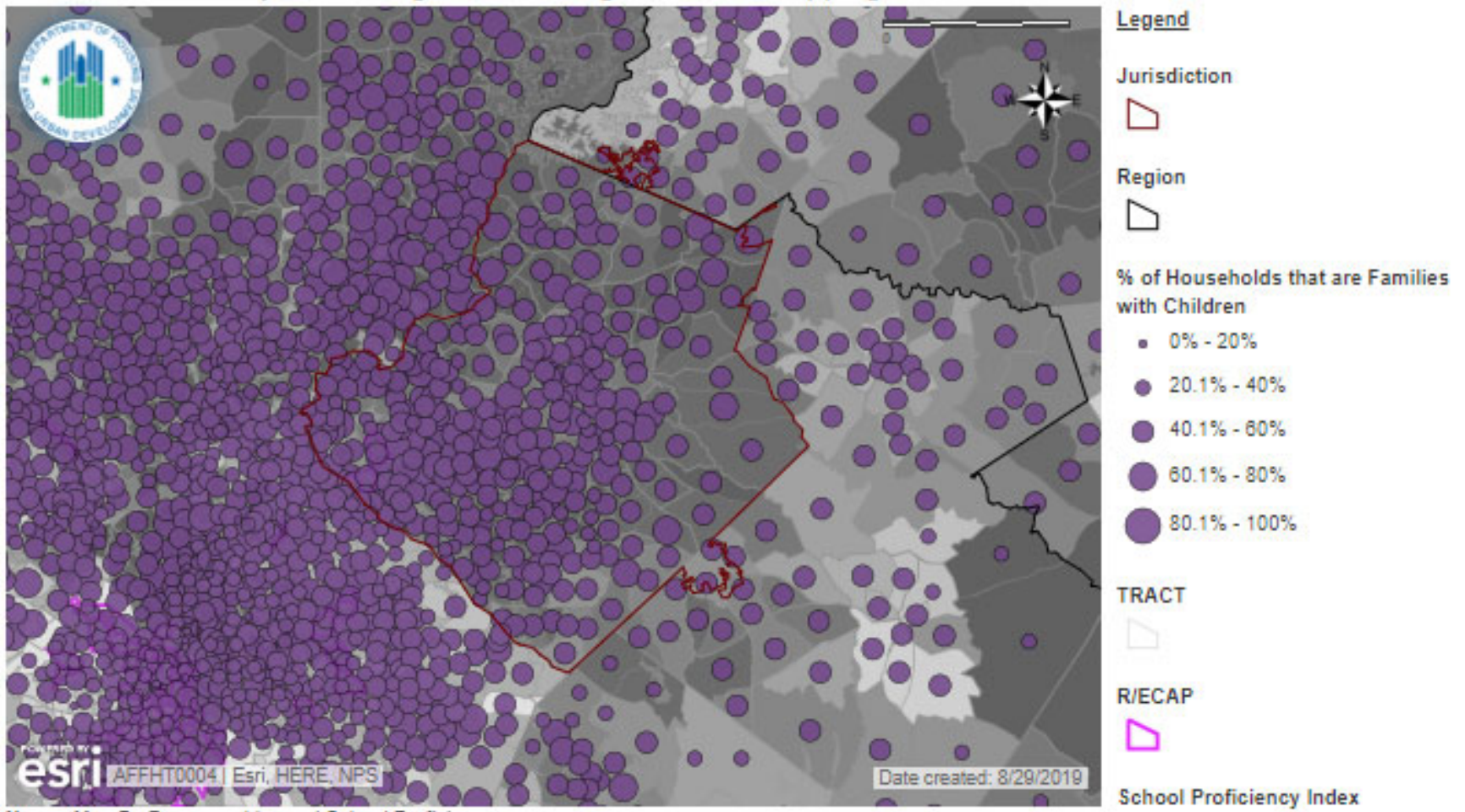


Figure 21 - School Proficiency Index and Familial Status



## Employment Opportunities

According to the AFFH Opportunity Indicators by Race/Ethnicity, the Labor Market Index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood based on the level of employment, labor force participation, and educational attainment in a Census Tract. While, the Job Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations and measures the physical distances between place of residence and jobs by Race/Ethnicity. Values range from 0 to 100. The higher the index value, the better the access to employment opportunities for residents, high labor force participation, and high human capital of a neighborhood. The spatial distribution of racial/ethnicity, national origin groups, and families with children, overlaid by shading that job proximity and labor engagement levels for the jurisdiction and the region. In each map, lighter shading indicate areas of lower opportunity and darker shading indicates higher opportunity.

According to the Job Proximity Index categories from Table 24 at the County level, the Asian, non-Hispanic population have the highest score at 53.7 for the overall population. Other racial and ethnic groups are farther away from jobs as indicated by the lower job proximity index ranging from 47.07 to 49.18 for Native American, non-Hispanic; Black, non-Hispanic; White, non-Hispanic; and Hispanic respectively. When analyzed based on incomes below the federal poverty line within the County, the Asian population still had the highest job proximity score the remaining racial and ethnic groups followed the same trend as the overall population.

The Job Proximity Index values are higher at the regional level than the County. Regionally, the highest Job Proximity Index score is 56.83, reflected by the Asian non-Hispanic population. Whites and Black non-Hispanic have the bottom two scores in the region.

Based on labor-market engagement data, White and Asian populations in Gwinnett County have the highest labor-force participation with index values of 64.16 and 61.89 respectively. Native American, Hispanics and Blacks, have lower scores ranging from 49.45 to 57.96 with Hispanic being the lowest. Of the population below the federal poverty line in the County, White, non-Hispanic and Asian, non-Hispanic highest participation index value of 58.47 and 58.68 respectively. Hispanics have the lowest labor force participation with scores of 45.05. The residents of Gwinnett county overall demonstrate a higher labor market engagement than their counterparts in the region.

At the regional level, Asian, non-White also have higher engagement with labor market with a 66.71. White, non-Hispanic scored a close second with a score of 61.52 while the



other races and ethnic groups lagged with scores ranging from 45.05 to 55.08 with Hispanic scoring the lowest.

In conclusion, all population groups in the County demonstrate moderate employment participation. At both the County and regional level White, Asians, and Blacks, have higher labor force participation even when controlling for income; Whites and Asian, show a nearly ten-point difference compared to Hispanics. The same groups scoring higher on the participation index are also the groups that demonstrate a slightly greater access to jobs, by a spread of just five points on the proximity index.

Based on the Jobs Proximity Index (Table 24), Hispanics are the least successful in accessing employment with a score of 45.05, which is more than 8 points below the Asian population and 7 points below Native Americans. Further, of all foreign-born residents, those of Mexican, national origin appear to be less likely to have opportunity to access the labor market (Figures 22). Language barriers and associated educational attainment levels contributed to these results.

**Figure 22: Labor Engagement Index by race/ethnicity**

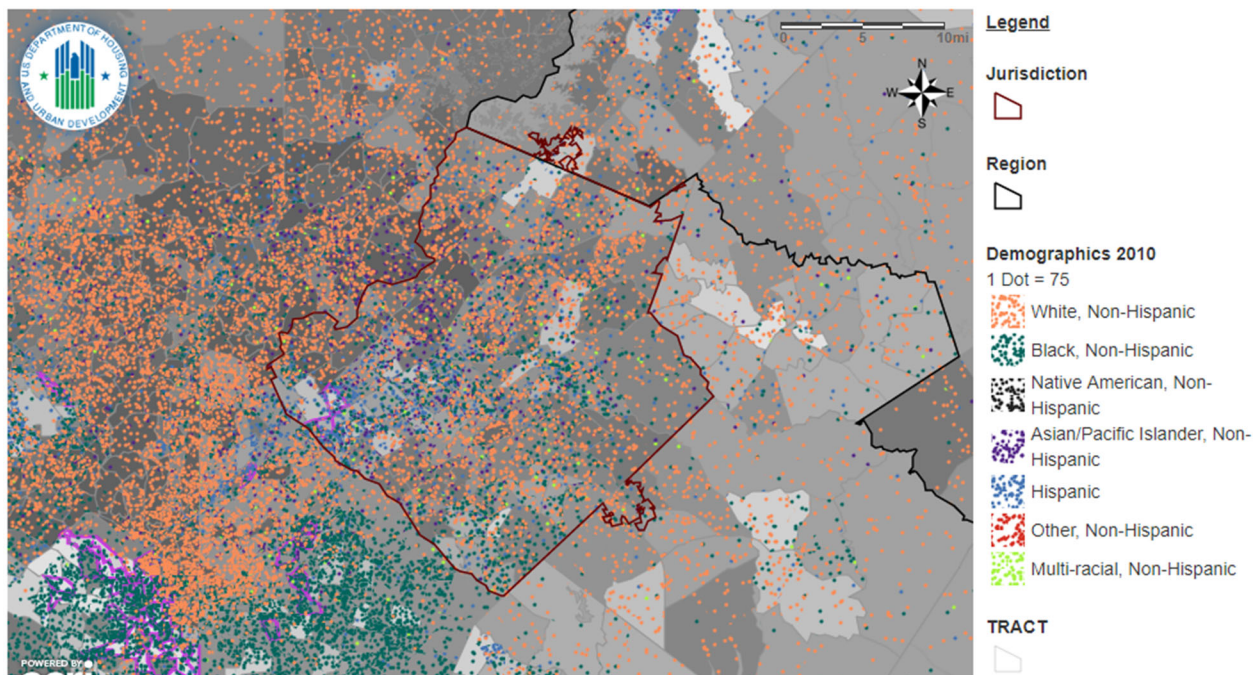


Figure 23 - Labor Engagement Index by National Origin

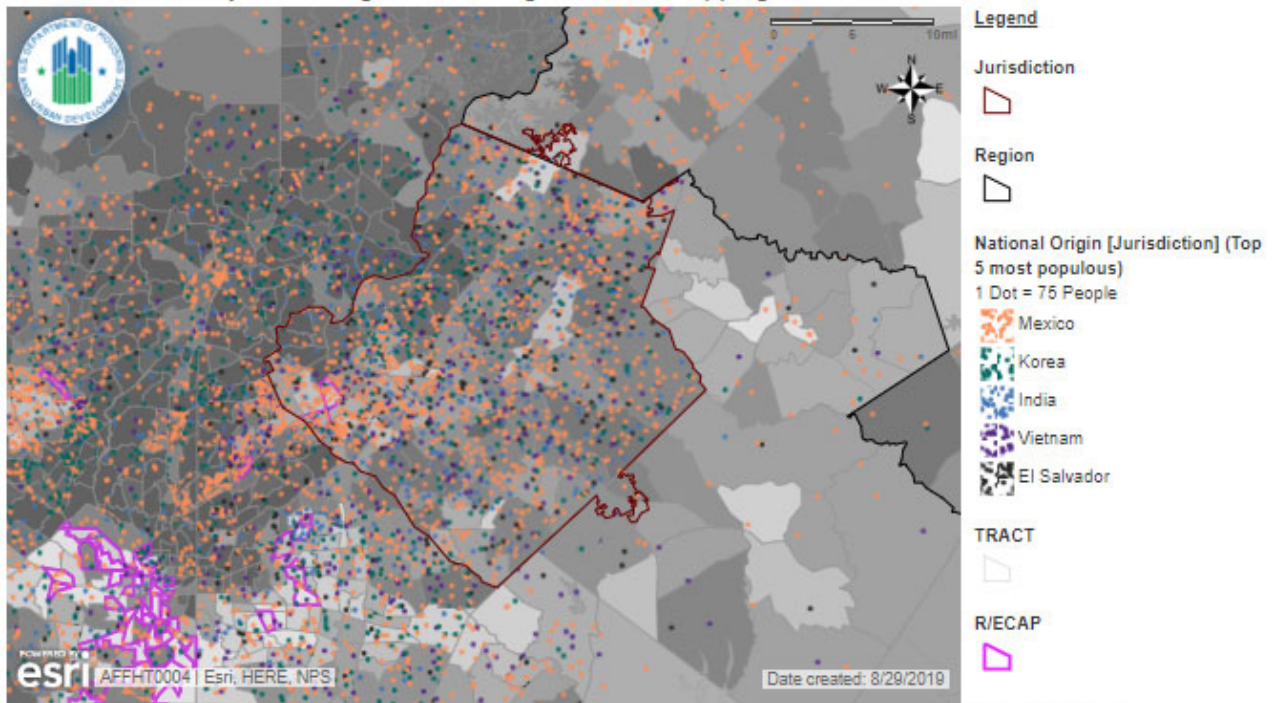
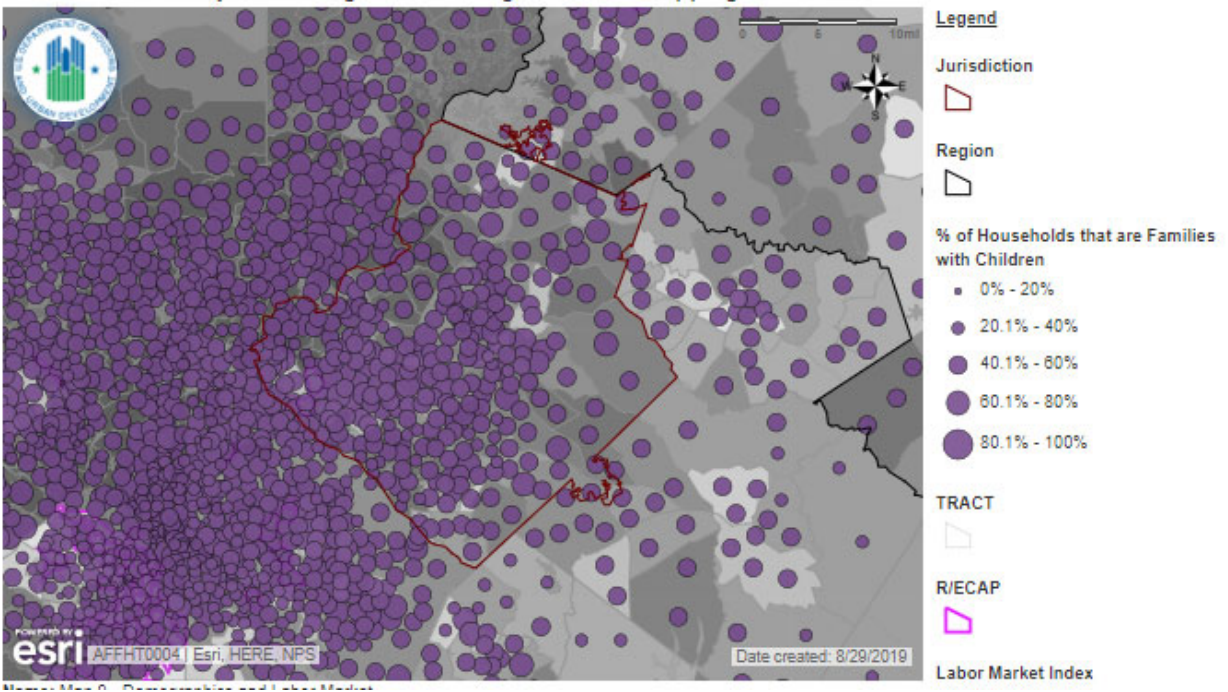


Figure 24 - Labor Engagement Index by Familial Status



## **Transportation Opportunities**

Public transportation in the County consists of fixed bus routes and para-transit services, available primarily along commercial corridors and within activity centers. Gwinnett County Transit operates a demand response service within the County for persons with disabilities.

Within the AFFH Data Documentation, HUD describes how the Low Transportation Cost Index measures cost of transportation and proximity to public transportation by neighborhood. The Index values range from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood. Also, the Transit Trips Index (Table 24) measures how often low-income families in a neighborhood use public transportation. The higher the value, the greater the number of trips taken, thus indicating the more often a neighborhood utilizes public transit.

Both indexes are based on estimates of transportation costs for a family that meets the following description: a 3-person, single-parent family with income at 50% of the median income for renter for the region. HUD data displays the Low Transportation Cost Index based on racial/ethnicity, national origin, and households with children for both the County and the region. Lighter shading indicates areas of lower opportunity, and darker areas indicate areas of higher opportunity.

At the County level, public transportation is accessible and used equally by all racial/ethnic groups, with values ranging from 60.96 to 72.11, with Hispanic population having the highest score. For the population below the federal poverty line, all race/ethnic groups show scores above 62, ranging from 52.84 to 74.16. Native Americans, Hispanics, Blacks, and Asians have the greatest use and accessibility to public transportation having scores of more than 68. The Low Transportation Cost Index at the County level shows that Hispanics and Asians often live closer to public transportation, using public transportation more often than other racial and ethnic groups. However, there is an even spread among all racial and ethnic groups with the highest score of 48.16.

At the regional level, Hispanics, Asians, and Blacks use public transportation more often, as indicated by index scores ranging from 68.30 to 71.05 and Whites with the lowest score of 58.30. For the population below the federal poverty line, Asians, Hispanics, and Blacks have the greatest accessibility and use of public transportation, with comparable scores of 71.05, 70.82, and 68.30, while Whites were 58.30. The Low Transportation Cost Index at the regional level, also shows Hispanic and Asian populations as being the groups that live closer to public transportation and comparatively lower public transportation costs.



Even when controlling for income at the County and regional level, Hispanic, Black, and Asian populations continue to utilize public transit and have the lower cost of transportation more often. In general, Hispanic, Blacks, and Asian residents of Gwinnett have easier access to transit than the region, and at a lower cost.

Based on the maps provided by Gwinnett County Transit bus stops map in the figure below, bus routes are concentrated along the I85 corridor. Most of the transit is concentrated in the southwest area of the County making transit options limited to get to employment centers in the County and the region.

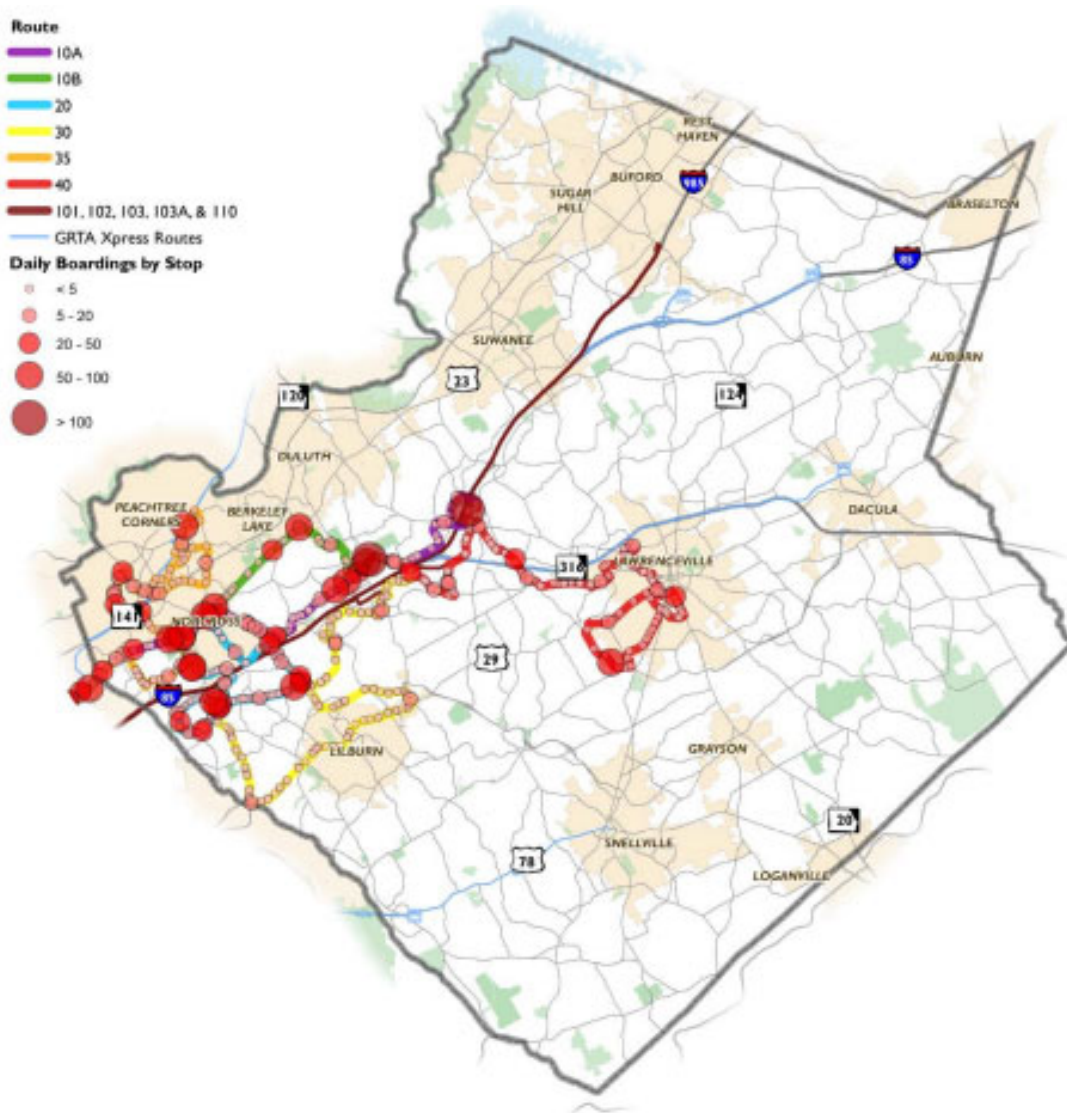


Figure 25 – Gwinnett County Transit System Route Map

Figure 26 - Transit Trips by Race and Ethnicity

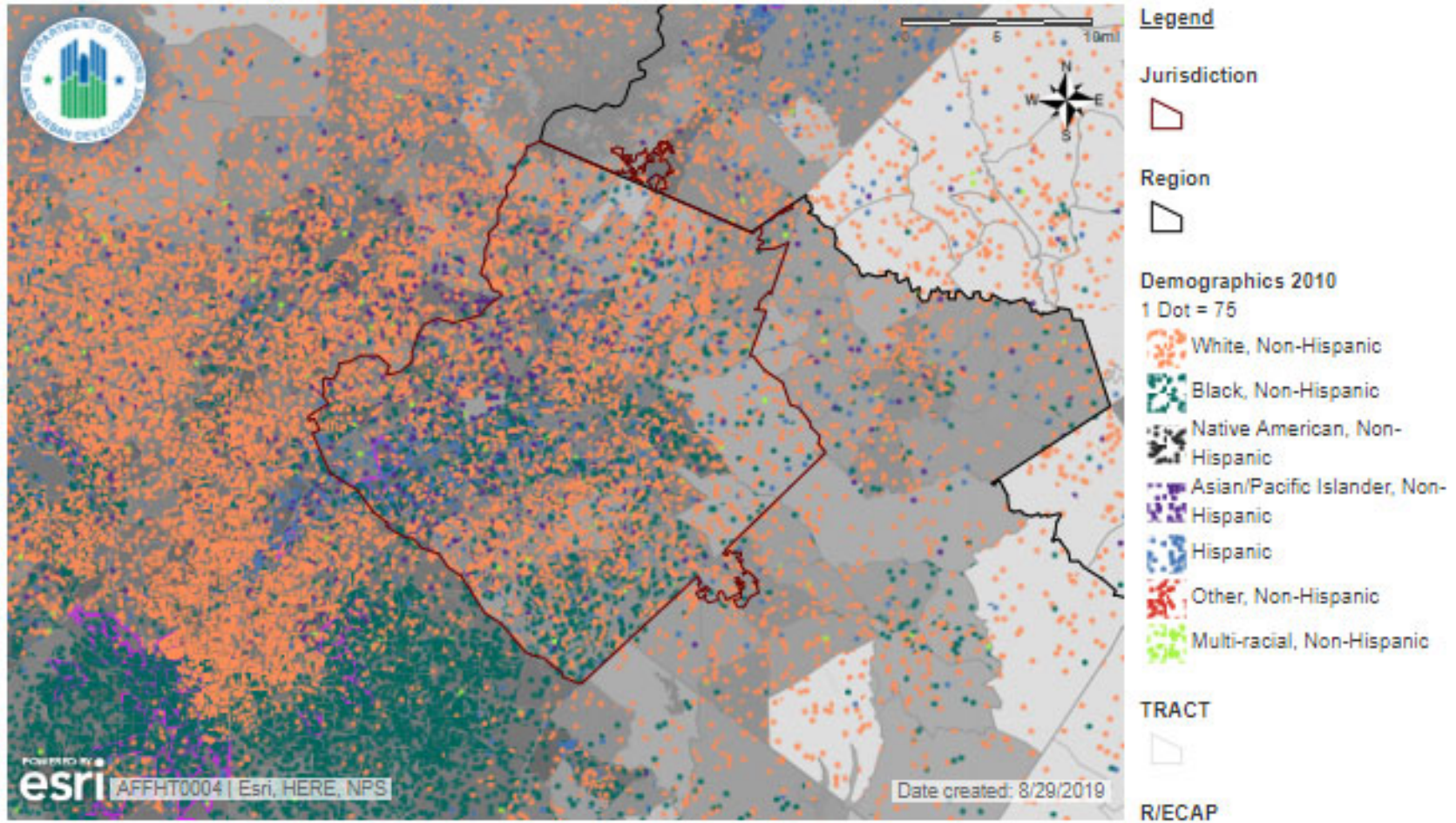




Figure 27 - Transit Trips by National Origin

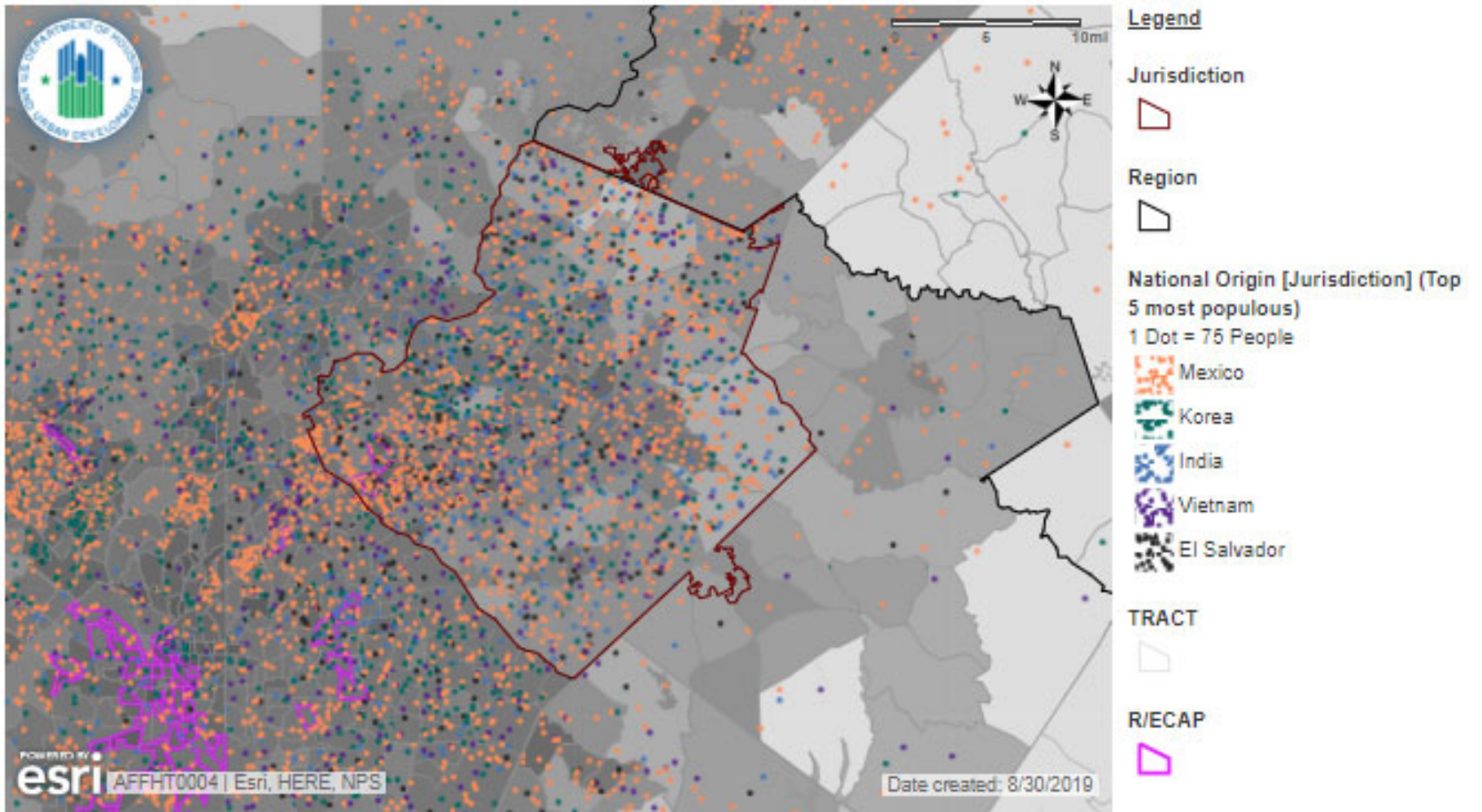
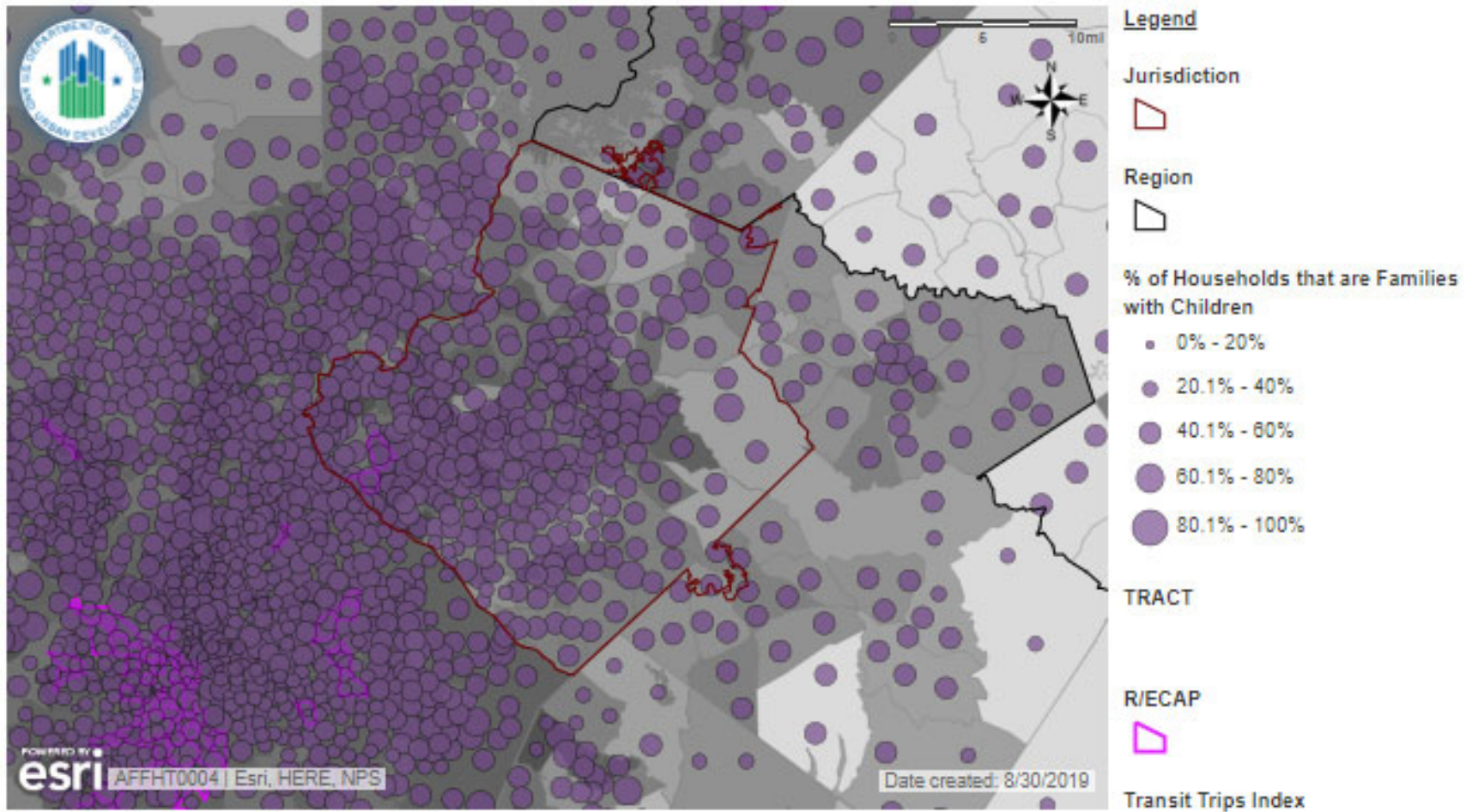




Figure 28 - Transit Trips by Familial Status



## **Environmentally Healthy Neighborhoods**

The Environmental Health Index shown in Table 24 and Figures 29 through 31 measures exposure air quality carcinogenic, respiratory and neurological toxins by neighborhood in Gwinnett County, based on Race/Ethnicity, national origin, and households with children. Values range from 0 to 100. Higher values indicate a better environmental quality. Lighter shading indicates areas of lower quality and darker shading indicates areas with greater access to healthy environments.

The Environmental Health Index score shows that all groups in Gwinnett County experience a similar level of exposure to environmental toxins with scores around 30. Whites have the highest score of 33.94 that is, the least exposure compared to other groups; and all other groups scores show a slight increased exposure with Hispanic, Native Americans, Asian, and Black populations having scores range from 26.98 to 31.01. When controlled for income, Hispanic and Asians have a higher exposure to environmental hazards with a score of 25.32 and 28.50. Blacks and Native Americans at lower incomes have a similar score at 30.87 and 31.01. Whites have less exposure to environmental hazards with a score of 33.94.

The Regional Environmental Index reveals similar values across all racial and ethnic groups. The White population has the highest score of 36.21, followed by Native Americans with a score of 32.01. Hispanic and Asians are third and fourth with a scores of 27.81 and 27.32. The Black population is the group with the lowest score of 25.33, meaning that this is the group experiencing the most exposure to toxins and air pollutants, albeit there is only a 11-point difference between the most exposure and the least exposure. Furthermore, all the scores are so low that all groups are more exposed to environmental hazards. Analysis of populations below the federal poverty line within the region show minor difference from those groups above the poverty level.

Figure 29 - Environmental Health Index by Race/Ethnicity

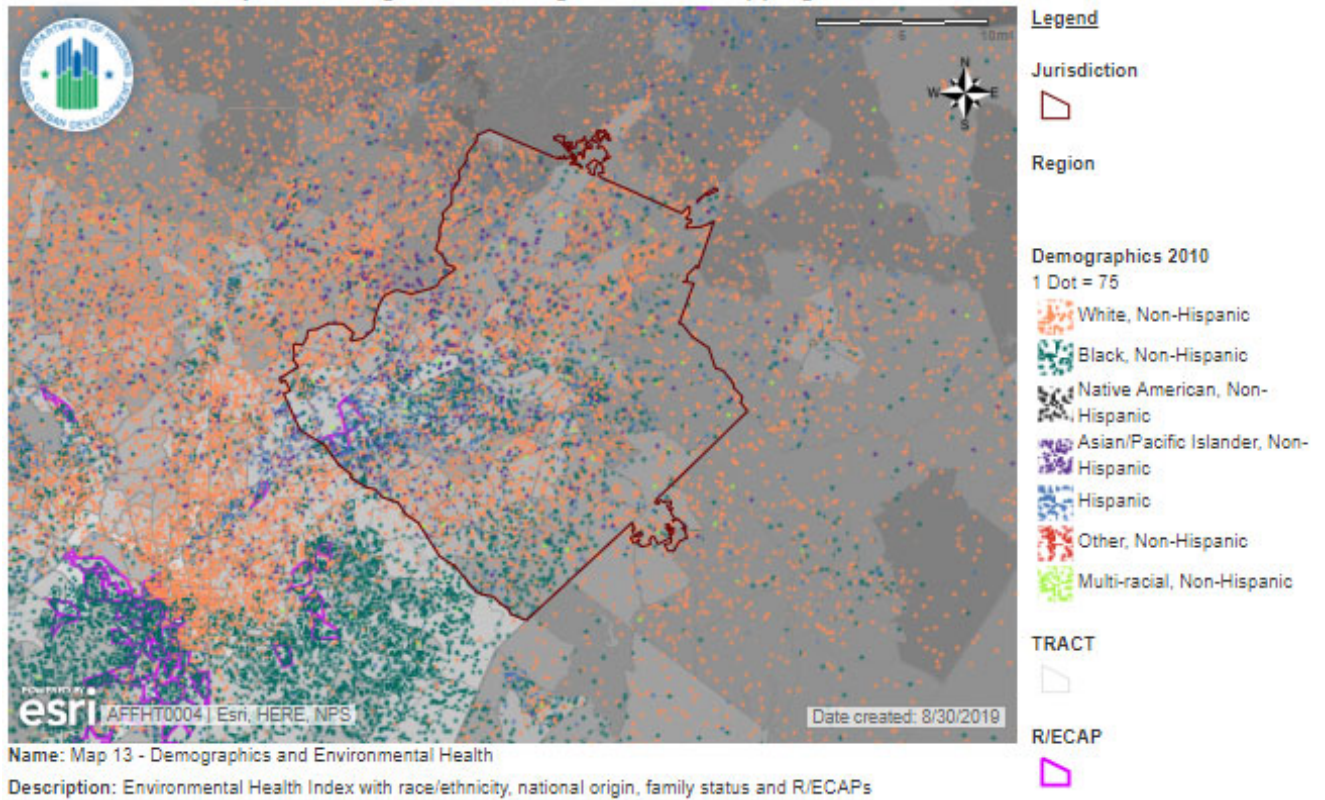


Figure 30 - Environmental Health Index by National Origin

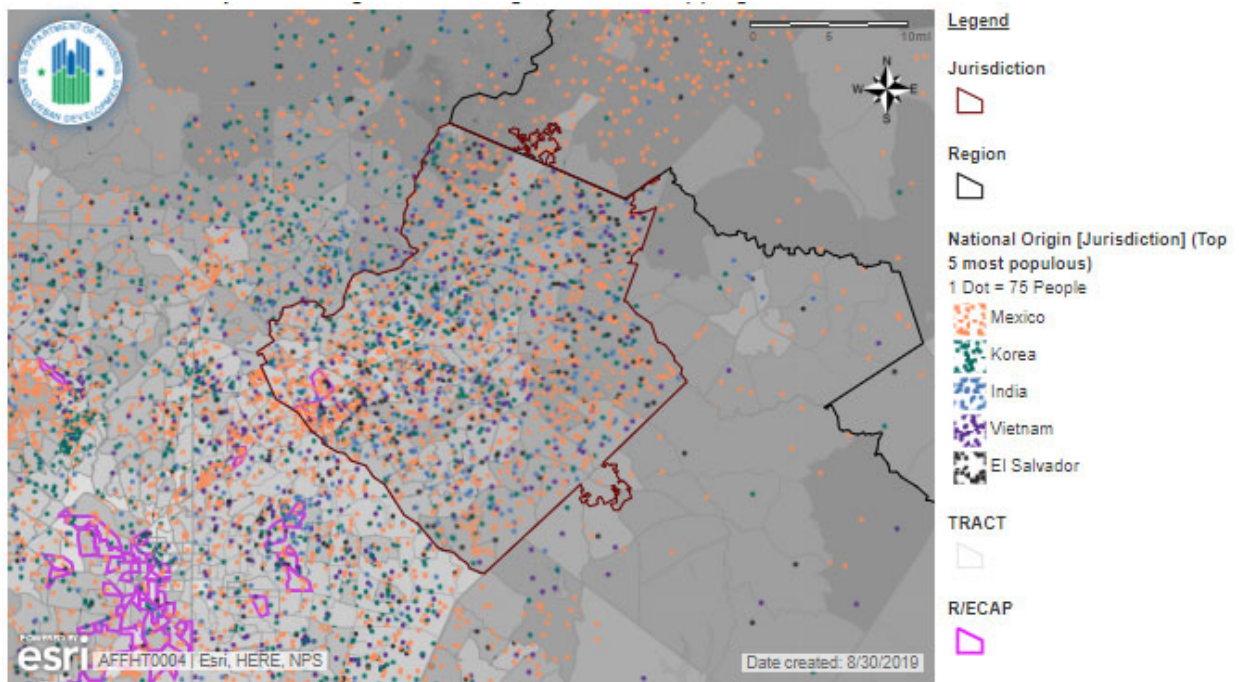
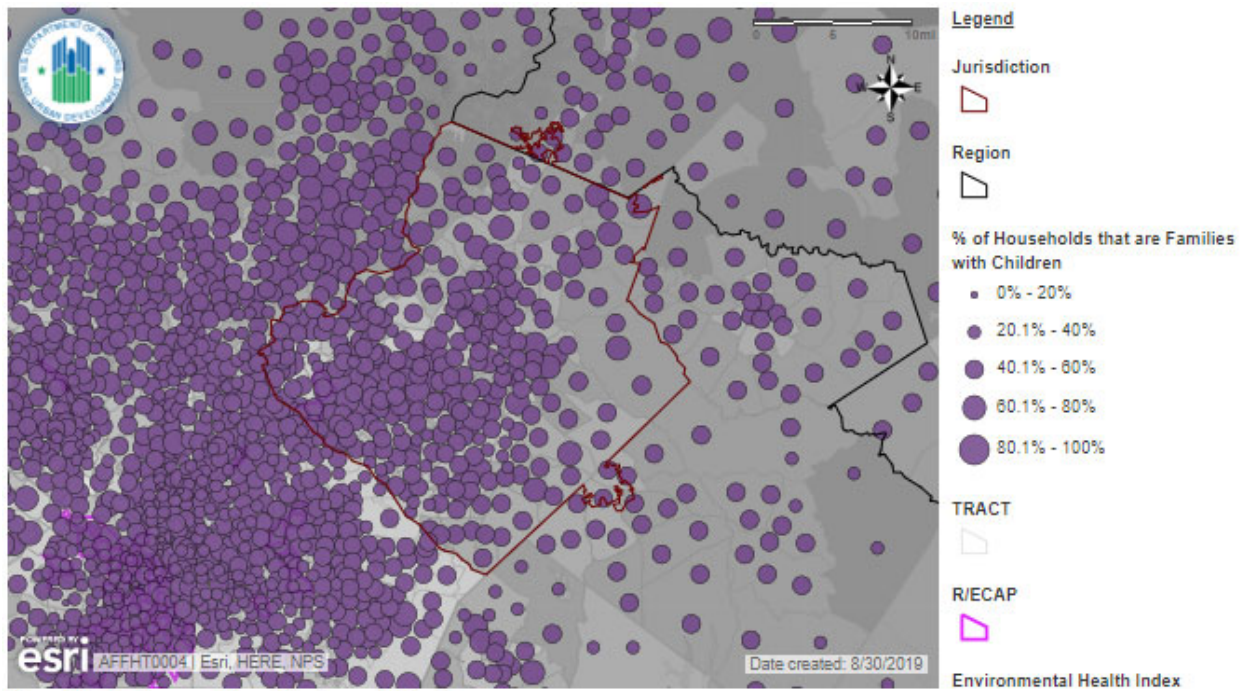




Figure 31 - Environmental Health Index by Familial Status



## Housing Discrimination Complaints

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

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination," as well as a "Charge of Discrimination," and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court. "How Much Do We Know" published by HUD in 2002, reports that only half of the public could correctly identify as "unlawful", six out of eight scenarios describing illegal fair housing conduct. Less than one fourth of the public knows the law in two or fewer of the eight cases.

Individuals with more knowledge are more likely to pursue a complaint than those with less knowledge of fair housing laws. Therefore, there is an association between knowledge of the law, the discernment of discrimination, and attempts to pursue it. Locally, it is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues to better equip persons with the ability to assist in reducing impediments.

Each year National Fair Housing Alliance [NFHA] collects data from both private, non-profit fair housing organizations, and government entities to present an annual snapshot of fair housing enforcement in the United States. The data in the 2018 Fair Housing Trends Report represents the number of complaints filed in 2017, which is significantly less than the actual incidence of discrimination each year. Many cities, rural areas, and even entire states do not have access to the services of a private or public fair housing organization as funding of fair housing enforcement programs is grossly insufficient to address housing discrimination throughout the United States. This report consists of information about the kinds of reported discriminatory acts that occurred in 2017, including the protected class basis of a complaint (i.e. race, color, national origin, disability, familial status, sex, religion, and bases protected under state or local laws). The report also examines the housing transaction in which an incident occurred (rental

housing, real estate sales, mortgage lending, homeowner’s insurance, advertisements, zoning and land use ordinances, and harassment in any type of housing). According to NFHA, nonprofit fair housing organizations, HUD, FHAP agencies, and the DOJ reported 28,843 complaints of discrimination, which is a slight increase from previous years. As noted in the NFHA 2018 Fair Housing Trends Report, more disability complaints have been filed than any other type of fair housing complaints. Discrimination based on disability represented 57% of all complaints, while discrimination on the basis of race represented 19 percent of all complaints. Disability-based discrimination is easier to detect because it is typically blatant and as such is reported at higher rates than other types of discrimination, which occur more subtly and are less often recognized.



Figure 32: Fair Housing Trends

## **Complaints Filed with HUD**

Region IV of HUD's Office of Fair Housing and Equal Opportunity (FHEO), located in Atlanta, Georgia, receives complaints from households regarding alleged violations of the Fair Housing Act from the states of Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. FHEO's mission is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of, and investigates complaints of, housing discrimination, employment, housing, public accommodations and hate violence.

From December 1, 2015 to December 31, 2018, Gwinnett County residents filed 51 housing discrimination complaints with HUD. The basis for discrimination in these cases was disability, race, sex, national origin, religion and familial status. Based on the complaint information received from the HUD regional office; one case remains open. Of the 51 cases filed in the three-year period, HUD settled 16 cases for a combined total of \$20,029.00 to the complainants. These complaints were settled based on the following protected classes: disability, race, familial status, and national origin. Additionally, complainants withdrew eight complaints after resolution and HUD awarded a combined \$1,824.00 to the complainants. Two complainants failed to cooperate and the remaining 24 were closed with no-cause.

Section 504 of the Federal Rehabilitation Act of 1973 prohibits discrimination based on disability in any program receiving Federal financial assistance. This includes provisions for providing reasonable modifications in all rules, policies, and procedures. Programs must be readily accessible to and useable by individuals with disabilities. Major alterations or construction of dwelling units must provide at least 5percent of units accessible to people with mobility impairments and at least 2 percent of units accessible to people with visual or hearing impairments. During the time-period, disability was the most common basis for discrimination appearing in 24 of these cases.

## **Hate Crime Data**

As of 2019, Georgia does not have hate crimes laws. The Georgia Supreme Court struck down the state's hate crimes legislation in 2004. The court reasoned, in a unanimous decision, that the law was broadly written and would not be effective in targeting true hate crime perpetrators. This makes Georgia part of a small number of states that does not have a state-level hate crime statute. Lack of a state hate crime statute can make reporting difficult as seen in the Federal Bureau of Investigation's 2016 Hate Crime Report. Georgia had provided incident reports with six incident reports submitted. These reported instances are low when compared to other states within the FBI report. The



absence of a state-level hate crime law prevents Gwinnett County from prosecuting people at a state level but does allow the federal statute to be utilized more quickly.

## **Fair Housing Enforcement, Outreach Capacity, and Resources**

The availability of educational resources to residents is imperative when it comes to fair housing education in the local communities. Accessibility to fair housing education, outreach, and handout materials contribute to reducing violations and impediments within the community. Local nonprofit organizations and private institutions certified by HUD as housing counseling agencies often provide fair housing resources and services to the community.

Public awareness of fair housing issues and laws is critical to reducing fair housing violations and is a means to ending housing discrimination. Having educational resources available to residents when it comes to fair housing ensures that residents have equitable access to healthy, opportunity-rich neighborhoods that are in line with their needs and preferences. In general, fair housing services can typically include the investigation and resolution of housing discrimination complaints; discrimination auditing and testing; and education and outreach including the dissemination of fair housing information such as written material, workshops, and seminars. Additionally, fair housing agencies may also provide counseling services that educate property owners and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations and in some instances, these agencies mediate disputes between tenants and property owners.

The baseline measurement regarding public awareness of fair housing issues comes from a national survey conducted in 2000 by HUD.<sup>10</sup> This survey revealed, “Majority of the adult public were knowledgeable about, and approved of, most aspects of the law, although the size of the majorities varies across these aspects.” In addition, only a small percentage of survey respondents who asserted their fair housing rights had been violated took action. In 2005, a follow up survey was conducted by HUD to measure the national increase in public awareness of fair housing rights and the survey revealed very little change in public awareness overall, however public support for fair housing had dramatically increased.

The Gwinnett Community Development Program is the local entity designated to educate local residents and organizations on fair housing rights and collect information on

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<sup>10</sup> Martin D. Abravanel and Mary K. Cunningham, *Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law*. U.S. Department of Housing and Urban Development. (February 2006).  
Source: <http://www.fhco.org/pdfs/DoWeKnowMoreNowSurvey2006.pdf>

potential fair housing complaints. This offers residents and potential grant fund recipients a centralized location to go to with fair housing concerns. Complaints received by Gwinnett County are forwarded to the local HUD office for review.

In addition to referring fair housing complaints and concerns, the Community Development Program also performs annual evaluations of fair housing requirements being implemented into their Annual Action Plan, 5- year Consolidated Plan, and housing program objectives. The Community Development Program hosts fair housing trainings and informational meetings for developers, property management firms, property owners, and other community organizations involved in real estate or rental housing. In addition to providing training for property owners and property management firms, the Community Development Program also educates eligible recipient homebuyers and renters about their protected housing rights. These rights are codified under the Fair Housing Act of 1967 which make it illegal for anyone that is looking to sell or rent out a home to discriminate based on the following categories which HUD defines as a 'protected class': race, color, religion, sex, national origin, disability or family status.

The Community Development Program increased efforts to educate and promote fair housing for residents of the County. Gwinnett County recently launched a fair housing program that robust education and outreach throughout the community. Efforts included distributing educational materials and fair housing workshops for elected officials, realtors, non-profit agencies, and the public. The intent of these workshops was to reach out to the community and provide information regarding the Fair Housing Act. Members from the staff were available to initiate dialogue with the attendees on their perception of fair housing choice within the county. Additionally, the Community Development Program recruited local community groups and organizations that have interest in promoting fair housing. Keynote speakers were invited to introduce relevant information related to fair housing to bring awareness to fair housing.

There are five private or nonprofit parties facilitating various housing programs and resources for residents of Gwinnett County, GA. The Analysis of Impediments to Fair Housing conducted for Gwinnett County in 2011 suggested "training and orientation for financial institutions would be helpful in promoting fair housing practices, as would more public education on fair housing laws and protection".<sup>11</sup> The analysis further revealed that residents did not indicate that the public education programs regarding protection under fair housing laws were encouraged. This may be one reason that the residents of Gwinnett County have not come forward with reporting violations in the past. When residents are not informed where to take questions and complaints, then residents may fail to report these potential violations. Public awareness of fair housing issues and laws

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<sup>11</sup> W. Frank Newton, Inc. (February 2011). *Analysis of Impediments to Fair Housing Choice in Gwinnett County, Georgia*

is critical to reducing fair housing violations and is a means to ending housing discrimination. As residents become more aware of their fair housing rights, a logical assumption can be made that more housing complaints will be filed.

One of the local nonprofit organizations heavily involved in Gwinnett County housing counseling and education is the Catholic Charities. This organization offers HUD approved housing counseling courses in Gwinnett County. Catholic Charities also offers other financial assistance services to low- and moderate-income residents.

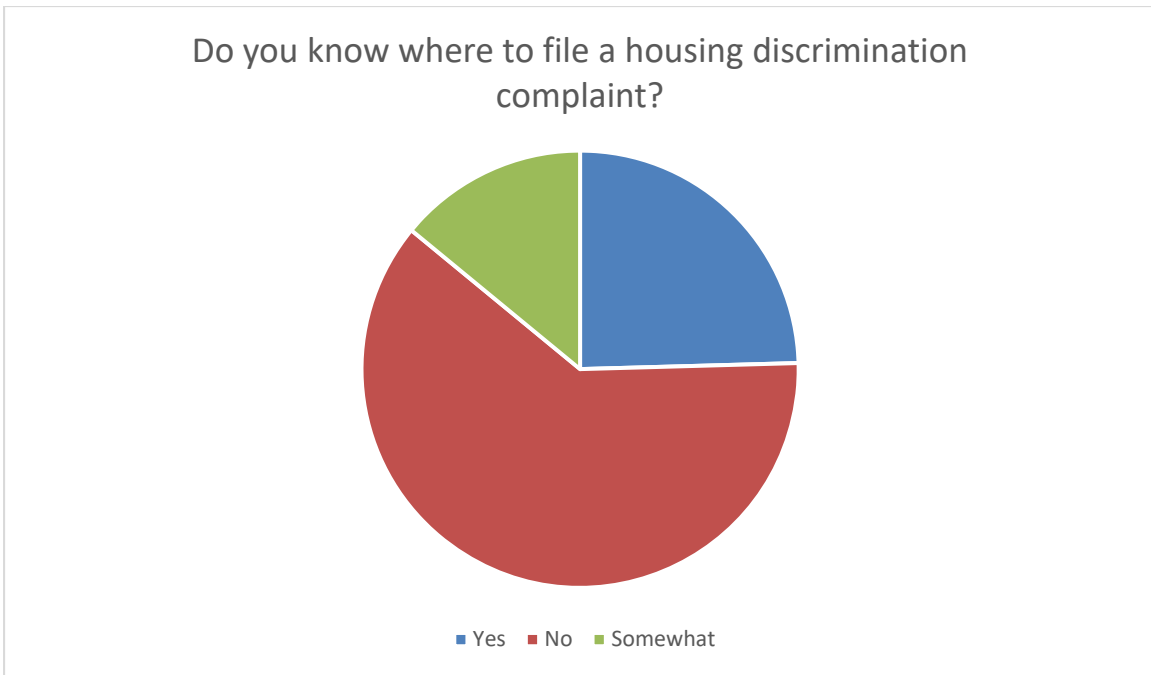
The Center for Pan Asian Community Services (CPACS), a local nonprofit, provides housing counseling services for foreclosure prevention, loan modification and mortgage fraud. Their education seminars cover homeownership seminars that are certified by HUD. Other services provided include rental and homeless prevention counseling.

Clearpoint Credit Counseling Solutions, a local nonprofit, has multiple branches throughout the Atlanta Metropolitan area offering services in credit counseling, homebuyer education, money management and many other areas that pertain to housing. Clearpoint has one location in Gwinnett County within the city of Norcross.

D&E Financial Education & Training Institute (D&E) is a 501(c)3 HUD Approved Housing Counseling Organization that is located in DeKalb County, GA. D&E provides HUD Certified first time homebuyers' seminars to residents of Gwinnett County. They also offer services in credit counseling, foreclosure prevention counseling and money management.

These organizations support and promote fair housing practices, by way of the homebuyer seminars and counseling services, to Gwinnett County residents. Three organizations offer homebuyer education classes monthly and D&E Financial Education and Training Institute offers two classes per month. All three organizations cover the following topics that are required by HUD: (1) Are you Ready to Buy a Home; (2) Managing your Money; (3) Understanding Credit; (4) Getting a Mortgage Loan; (5) Shopping for a Home; and (6) Keeping your Home & Managing your Finances.

The recent survey conducted along with Gwinnett County's 2020 Analysis of Impediments to Fair Housing Choice, identified that 61% of Gwinnett County residents who responded to the survey were not knowledgeable of where to file a complaint.



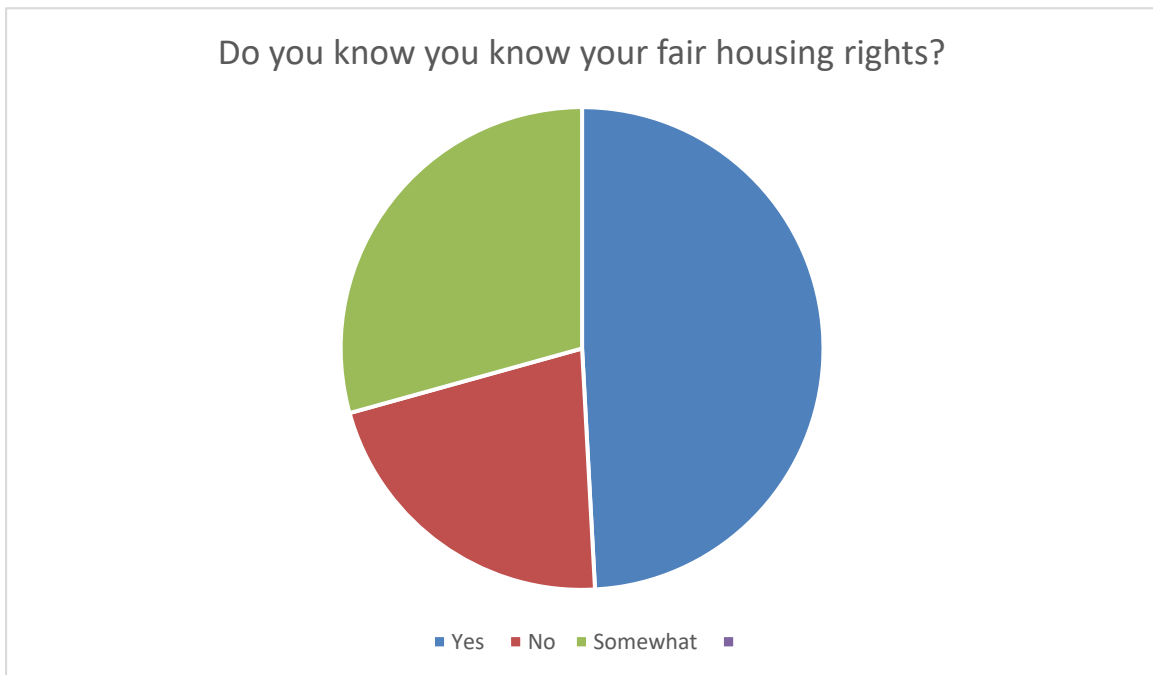
**Figure 44: Do you know where to file a housing discrimination complaint?**

Source: Gwinnett County Analysis of Impediments for Fair Housing Choice Survey

At a neighborhood meeting for Gwinnett County residents, attendees suggested that the County needs to expand on providing fair housing education directed to different ethnic minority communities. Participants also suggested that a roundtable discussion, along with the development of a research commission, would increase awareness of fair housing education. In addition, information on fair housing education, handout materials and workshops should be made available through the County and City websites.

While there are a number of organizations within Gwinnett County that provide Fair Housing education there are still a large number of residents who do not know what their Fair Housing rights are. The survey developed as a part of this analysis asked respondents if they knew their Fair Housing Rights, only 49.14% (57) of respondents know their rights, 21.5% (25) did not know, and 29.31% (34) said they somewhat knew. Even when residents were aware of their housing rights, they still were unaware of where to file a complaint and even less like to seek assistance in determining how to report such incidence.

**Figure 45: Do you know your Fair Housing Rights?**



Source: Gwinnett County Analysis of Impediments for Fair Housing Choice Survey

With the capacity of organizations to provide fair housing education to the public, it would be in the best interest of Gwinnett County to utilize future funding allocations to sponsor Fair Housing Activities. These activities should include outreach events like round table discussions, and presentations on specific rights that may be of interest to the public. These activities should be coordinated with local minority groups or organizations that serve as advocates for protected classes to ensure that a comprehensive outreach is accomplished.

Additionally, any organization receiving future funding for fair housing education should submit all education materials and curriculums for review and approval by Gwinnett County staff. The materials will then be reviewed to ensure compliance with current Fair Housing laws.

Based on the following feedback from many residents in the County, there is strong need for improvement on fair housing educational efforts directly to the housing industry and to the public. Recommendations were offered:

- The Gwinnett Community Development Program should develop and create educational objectives for the education and promotion of fair housing. Outline required actions and evaluate results on an annual basis and present goals to all relevant players.

- The Community Development Program should provide annual training workshop to educate profit and nonprofit housing organizations.
- The Community Development Program collaborate with the regional fair housing agency to set annual educational goals and objectives to ensure consistent messaging to the public regarding fair housing rights and responsibilities.
- Develop relationships with housing providers and developers to encourage more involvement in the promotion of fair housing
- The Community Development Program should sponsor information booths on fair housing local real estate events to ensure that housing professionals are well versed in their fair housing responsibilities.
- Translation for fair housing educational materials should be available in English, Spanish, and Korean which are the top three languages spoken in Gwinnett and to also ensure that they are made available in a format in on location and in downloadable format on the website.
- Develop fair housing workshops to educate professionals within the housing industry and the public. For real estate agents, it is recommended that the course be designated as “continuing education” in order to increase attendance. To educate the public, it is recommended that the fair housing workshops be informative, educational and engaging, as well as adequately promoted to ensure participation.
- During the month of April, workshops to profit and non-profit organizations should provide technical assistance and provide relevant, current information on the topic of fair housing, as well as clearly outline how complaints should be managed.

## Assessment of Past Goals, Actions, Strategies

Gwinnett County's last Analysis of Impediments to Fair Housing Choice (AI) was adopted in 2015. The 2015 AI identified a total of six impediments to fair housing choice in Gwinnett County. Each impediment and associated recommendation(s) from the 2015 AI are listed below, along with a brief summary of the progress the County has made. Progress on goals was assessed through an examination of the County's Consolidated Annual Performance Evaluation Reports and discussion with Community Development Program staff.

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

**Recommendation Actions:** Gwinnett County must actively work to address the need for more decent and affordable housing by continuing to prioritize investment of funds into all of its housing programs. In order to accomplish this, three action steps are recommended:

- (1) Increase the preservation of existing affordable housing by the continued funding from the CDBG Program for the Homeowner Rehabilitation program;
- (2) Increase the production of affordable housing units through the use of the Home Investment Partnerships Program and Neighborhood Stabilization Program funds; and
- (3) Increase the number of nonprofit developers that participate in the County's affordable housing programs and strengthen the capacity of those currently engaged.

Additionally, it is recommended that the County consider opportunities to support Low Income Housing Tax Credit (LIHTC) projects proposed by developers in the area, either through letters of endorsement or the investment of HOME funds, to the extent that a nominal investment of HOME funds may make a project application more competitive. Gwinnett County should also look to partner with Community Improvement Districts (CID) and the Economic Development Department to discuss the potential for projects within existing Opportunity Zones.

**Progress:** Gwinnett County has continued to prioritize housing programs during each grant cycle and has consistently invested in the CDBG Homeowner Housing Rehabilitation Program and HOMEStretch Down Payment Assistance to ensure current homeowners are able to stay in their homes and potential homeowners have the opportunity to purchase a new home. Over the past five years, Gwinnett County has focused heavily on single-family acquisitions and rehabilitation through its HOME Investment Partnerships that add stock to both the homeowner and rental portfolios in Gwinnett County. In 2017, the Gwinnett Board of Commissioners launched an Affordable



Housing initiative and set out to find a local non-profit Community Housing Development Organization to participate and strengthen the capacity and impact in the community.

In 2018, Gwinnett County Department of Financial Services and Community Development Program office issued a letter of commitment to participate in a local income tax credit project proposed by a housing developer. Although the project has been delayed until 2020, the County is fully committed to backing this project.

The Community Development Program office has had conversations with other County departments (Economic Development, Community Services, Planning and Development) about the potential for collaboration on future projects.

## **Impediment #2: Accessibility and Mobility Issues**

**Recommendations:** In the spring of 2015, Gwinnett County's Department of Transportation will initiate an update to the Comprehensive Transportation Plan (CTP), which will examine all transportation modes, including bicycling, walking and transit. Specific efforts will be made to focus on transit with the goal to optimize the current system within five years. The CTP effort will carefully evaluate the existing routes and coverage, which will most likely result in changes to existing routes, shifting hours of operations, and other necessary actions. Gwinnett County will update both its 2015-2019 Consolidated Plan and its 2015 Analysis of Impediments to Fair Housing Choice to reflect actions identified to address transit system improvements.

**Progress:** The most recent Comprehensive Transportation Plan (CTP), from 2018, details short, mid, and long-range goals for improving the transit needs in Gwinnett County based on population growth trajectories. Some outcomes included in the plan are:

- Modifications that will improve service and ridership
- Access untapped markets of latent demand that is constrained by fleet and infrastructure
- Expansion of transit accessibility
- Expansion of Fleet and Infrastructure

While several milestones have been met since the 2015 CTP, the Department of Financial Services and Community Development Program office have continued to invest in community projects that increase accessibility in the County such as sidewalk installations, walking trails, and bike lanes.

## **Impediment #3: Restrictive Zoning Provisions**

**Recommendations:** Gwinnett County is updating its Comprehensive Plan starting in 2015. The focus of this update will be on land use and future development in Gwinnett County through 2030. The Community Development Program needs to be an active participant in this process and engage with the Planning and Development department to make sure that they are fully briefed on the anticipated *Fair Housing Rule changes, as well as the implications of Disparate Impact.*

**Progress:** Gwinnett County Community Development Program office has built a solid relationship with the Planning and Development staff. Members of the team are active participants and land use and development meetings. CDP staff has also educated leadership in several departments on the important of Fair Housing and the affects and implications of Disparate Impact as a result.

#### **Impediment #4: Resident Viewpoint on Affordable Housing**

**Recommendations:** To combat the negative attitudes toward fair and affordable housing, the County should develop and implement a systematic model of fair housing education. Fair Housing programs should be offered to the public by holding workshops or by sending speakers to club meetings and other gatherings. Observance of Fair Housing Month each April is encouraged and should include a proclamation from the Board of County Commissioners, a press release and an event drawing attention to the issue. The County should also consider setting aside a portion of its annual CDBG allocation, perhaps seeking a match from the local Board of Realtors or another housing or civic-minded organization, as a fair housing grant, to be competitively awarded to nonprofits or other organizations that can assist the County in carrying out these recommendations.

**Progress:** Gwinnett County Community Development Program staff has complied a series of educational workshops that educate both citizens and local governmental officials on the importance of fair and affordable housing in Gwinnett County. In the past, we have worked with non-profit organizations to assist with carrying out the message. Each year, Gwinnett County obtains a proclamation from the Board of Commissioners in observance of Fair Housing Month in April.

#### **Impediment #5: Deficiency of Fair Housing Education**

**Recommendations:** The County provides funding for Fair Housing Education and Housing Counseling as a portion of its CDBG public service funds. Additional money has been set-aside for a competitive Fair Housing Grant for an organization that will carry out a focused fair housing education program in the area. This should also continue in future years. As a component of the Fair Housing Grant, the successful applicant should launch and sustain an education campaign to increase the public's awareness of housing discrimination and of the process for filing housing discrimination complaints with HUD.

Additionally, the County should consider requiring an annual review and approval of all Fair Housing curriculums to ensure that the materials are current and compliant with both federal regulations and County objectives.

**Progress:** Each year CDBG funds are allocated to agencies that apply for fair housing and housing counseling. In 2018, Gwinnett County began to utilize the Community Development Program office to host Fair Housing educational workshops throughout the County every month. Although funding was not allocated for fair housing education in 2019, the CDP staff is still actively educating citizens and subrecipients on the importance of fair housing. Additional resources are also available on the County's website.

#### **Impediment #6: Underserved Populations**

**Recommendations:** In order to develop a plan to properly address the needs of those that are underserved the County must devise a collaborative plan that will engage the County with its local nonprofit service providers, the Gwinnett County Coalition for Health and Human Services, and the Georgia Department of Community Affairs (as the administering body of the Continuum of Care). During this collaboration led by the Gwinnett County Human Relations Commission, clear processes need to be determined that will capture data, identify needs, and present action steps to address the needs. Additionally, engagement with nonprofits serving minority populations that do not speak English as their first language should be utilized to ensure translation services are utilized to broaden the reach of this effort through the development of a Limited English Proficiency plan as part of Gwinnett County's Citizen Participation Plan.

**Progress:** Each year the Gwinnett County's Citizen Participation Plan is updated to reflect current changes within the community. The County is diligent about actively involving the public for use of grant funds by publishing advertisements and notice of funding availability in English, Spanish, and Korean to help broaden the reach of or efforts. Staff from the CDP office attends weekly meetings at the Coalition to discuss and collaborate on ways to better assist the underserved population in Gwinnett County. Plans to join the Continuum of Care to create a more streamlined process to better serve the community is in the works.

## Impediments & Suggested Actions

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

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

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

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

For this analysis, HUD's *Fair Housing Planning Guide* defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices.<sup>12</sup> Throughout this analysis, various community issues have surfaced, both positive and negative. Some of these issues represent general community needs (e.g. the quality of jobs available) and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments. Even some affordable housing-related issues (e.g. low credit scores leading to denial of apartment rental applications) fell short of classifying as impediments to fair housing choice.

Qualitative data received in the form of input from interviews and community meetings was combined with quantitative data from the fair housing survey and from the many other sources consulted, including the U.S. Census, the American Community Survey, and

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<sup>12</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Home Mortgage Disclosure Act data. In some cases, the quantitative data collected from a sole source was clear and compelling enough on its own to indicate the existence of an impediment. In other cases, and particularly with the use of qualitative data, the cumulative effect of a comment or criticism repeated many times over in many different settings was sufficient to indicate an impediment. Sometimes a weak or inconclusive correlation of quantitative data from one source could be supported by public comments and input or data from another source to constitute an impediment.

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

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

The main premise of fair housing choice is to ensure that people of similar income levels have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or disability. The presence of limited supply of affordable housing units' limits housing choice. The demand for more units is evident in the rapid growth of Gwinnett County's population and steady economic growth. However, the county needs homes affordable to all income levels in the renter and homeownership categories. So, if there is demand, why is the market not building more affordable housing?

The combination of high land prices and restrictive zoning practices, land use, and development policies sometimes limits the ability to create new affordable units. According to the Atlanta Regional Commission, the cost to construct new affordable housing outpaces the income that a household can afford at 30% of their income. For example, the current construction cost of a \$153,500 per unit for a one-bedroom low-rise apartment requires minimum rent of \$1,300 to be feasible. Conversely, the maximum rent that a household at 60% and 80% of AMI can only afford \$740 to \$1,035 monthly. Thus, highlighting a burgeoning issue of how to increase affordable supply.

Gwinnett County faces a difficult set of circumstances in trying to determine the best way to provide affordable housing to those in need while protecting property values and maintaining stable economic growth. The lack of affordable units can jeopardize Gwinnett County's competitive edge as an affordable county to attract future jobs and economic growth. Understanding this juxtaposition of housing affordability and economic growth positions Gwinnett County in a prime position to develop strategies that fully address this issue.

### **Recommendations:**

- (1) Maintain affordable inventory by increasing the preservation of existing affordable housing by continuing to fund the CDBG Homeowner Rehabilitation Program;
- (2) Increase the production of affordable housing units through the use of the Home Investment Partnerships Program and Neighborhood Stabilization Program funds;
- (3) Increase the number of nonprofit developers that participate in the County's affordable housing programs and strengthen the capacity of those currently engaged; and
- (4) Support Low Income Housing Tax Credit (LIHTC) projects proposed by developers in the area, either through letters of endorsement or the investment of HOME funds.

### **Impediment #2: Housing Affordability/Cost Burden**

High rents in relationship to the earnings of low-skilled workers put housing affordability out of the reach for many. Housing is the largest monthly cost for most households. In fact, 29% of owners and 52% of renters spend more 30% of their income on monthly housing costs. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

Housing Affordability/Cost Burden is a problem that affects households whose incomes are below 80% of AMI. Gwinnett County faces a growing issue in trying to identify, quantify and qualify new and existing affordable housing units. With a wider range of housing options, Gwinnett County would be better equipped to tackle the affordable housing problem. While there is no single "silver bullet" solution to the challenge of making housing more affordable. The effort requires comprehensive strategies and a variety of tools that can be used alone or in combination to reduce costs and increase availability.

**Recommendations:**

- (1) Explore re-purposing of existing real estate to include strip malls and extended stay hotels into rental units, including SRO options.
- (2) Provide tax incentives for apartment owners or owners of secondary residential properties who are willing to set aside a certain number of their existing apartments / homes as affordable housing.
- (3) Encourage more private sector investment in existing affordable housing properties to supplement federally funded efforts.
- (4) Leverage Tenant Based Rental Assistance as an interim solution for housing affordability.
- (5) Develop Economic Development activities that will provide opportunities for small businesses to grow their customer base in their pursuit of sustainability.

**Impediment #3: Housing Accessibility/ADA**

Comprehensive quality data in regard to accessible housing in the County do not exist and it is difficult to fully understand the extent of the problem. Much of the data that is currently collected relies on self-reporting of property owners, which does not yield reliable information because property owners are often unfamiliar with accessibility standards. Integrating people with disabilities into the community through accessible housing and other housing supports is beneficial for everyone. Making these opportunities available will prevent homelessness as well as unnecessary, costly, and overall harmful institutionalization of people with disabilities.

**Recommendations:**

- (1) Explore reliable methods to quantify the need for accessible housing
- (2) Raise awareness about universal design principles and provide incentives for new developers to use universal design techniques.
- (3) Expand the Housing Rehabilitation Program to provide financial assistance for residents to modify their homes incorporating universal design elements.
- (4) Accessible housing should be scattered throughout the County. People with disabilities should have many opportunities to select housing in the location they choose.
- (5) Ensure accessibility and convenience in the area around housing units including curb ramps in the sidewalk, proximity to public transportation and other amenities such as restaurants and grocery stores.



#### **Impediment #4: Public Transportation Infrastructure Needs**

Gwinnett County offers transit options through Gwinnett County Transit and the Georgia Regional Transportation Authority (GRTA). The transit system currently offers five routes that mostly flow along the I-85 corridor. This makes it difficult for residents who live in the eastern, western, and northern parts of the county to access this transit system. Additionally, there are only two GRTA routes that go from Gwinnett County to downtown Atlanta, which is one of the primary job centers for Gwinnett residents. By offering a predominantly north-south transit system the County limits the housing choice options of its residents who may not have reliable personal transportation and need public transportation to get to work.

#### **Recommendations:**

- (1) Evaluate projects for consistency with Gwinnett County's Department of Transportation Comprehensive Transportation Plan (CTP) to implement plans for all transportation modes, including bicycling, walking and transit.
- (2) Optimize the current system within five years. The CTP effort will carefully evaluate the existing routes and coverage, which will most likely result in changes to existing routes, shifting hours of operations, and other necessary actions.

#### **Impediment #5: Restrictive Zoning Provisions**

The Fair Housing Act prohibits municipalities and other local government entities from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against individuals protected by fair housing law, whether intentionally or by discriminatory effect. Discriminatory effect can be established by showing that an action, such as a zoning decision, while facially neutral, has either an adverse impact on a particular minority group or harm to the community generally by the perpetuation of segregation.

Zoning policies such as large minimum lot requirements, minimum multifamily zoning and age-restricted zoning may restrict and limit the ability for lower income families and families of color from moving into certain neighborhoods and suburbs. Such strict zoning restrictions limit the affordability and number of rental multifamily housing opportunities.

Further, single-family residential zones allow family residential use by right, i.e., without any conditional or special-use permit, and are not in and of themselves discriminatory. Local governments have their own definitions of "family," and such definitions may

generally restrict the ability of groups of unrelated persons to live together as long as the restrictions are imposed on all such groups regardless of race, religion, etc. However, they may be discriminatory when they exclude group homes for persons with disabilities, or if group homes are allowed, only by conditional or special-use permit.

Within Gwinnett County there are 16 municipalities, most of which operate their own zoning provisions and codes, beyond what the County offers in the Unified Development Ordinance (UDO). In some instances, these zoning regulations and requirements are inconsistent and do not permit for development depending on the type of housing project being built. Six of the local jurisdiction zoning ordinances restrict inherent residential use projects (such as shelters, group homes, or residential treatment facilities) only to non-residential zoning areas. Other issues identified in this analysis are based around where sewer or septic systems are allowed and utilized, where accessory structures (basements and carriage homes) are permitted, and the lot size requirements for distinct types of structures on differently zoned parcels of land. Additionally, the rezoning process appeared burdensome in how much it costs to apply for rezoning consideration and how much time it may take until the action is considered. These issues discourage developers from requesting rezoning and in some cases may stop them from developing properties altogether.

**Recommendations:**

- (1) Review land use and future development to ensure compliance with the Fair Housing Act.
- (2) Explore Zone Classification to determine the inclusion of diverse types of housing to expand housing choice.
- (3) Consider inclusionary zoning policy to promote mixed-income development.
- (4) Consider adopting a reasonable accommodation policy to provide written procedures for developers of housing for persons with disabilities.

**Impediment #6: Deficiency of Fair Housing Education**

Fair Housing education and outreach in the County is limited, but in recent years, the County has put forth more effort to offer educational opportunities on the fair housing law. The County has supported new initiatives to educate the community by developing workshops to engage and educate elected officials, real estate professionals, and the public. As helpful as these efforts are, numerous indicators point to the need to do even

more. Public opposition to affordable rental and for-sale housing suggests that residents may not fully understand the benefits available with affordable housing. Education and awareness of fair housing laws is imperative to alleviating housing discrimination. More than half of survey respondents stated they did not know where to file a fair housing complaint. The survey also supports the notion that increased education is also needed for property owners. Of those respondents to the survey believing they had been discriminated against, 72.2% said a property owner or real estate professional had perpetrated the discrimination. As the County continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

**Recommendations:**

- (1) Fund and promote fair housing education and housing counseling activities with CDBG Public Service funds
- (2) Develop a fair housing education campaign to increase public awareness by expanding current initiatives

**Impediment #7: Underserved Populations**

As previously stated in this Analysis, Gwinnett County is one of the most diverse counties in the State of Georgia. With a diverse population comes a diverse set of needs that range from reducing traffic on congested roads to providing basic shelter for the homeless population. It is easy and convenient to blame the government for overlooking those residents who are in the most need. However, those in need often lack a clear and consistent voice.

It is impossible to serve people who are unable to be reached on a consistent basis due to language or cultural barriers. In Gwinnett County a number of sub-populations have needs that should be addressed, but that currently go unheard and remain underserved. Every effort and outreach must be undertaken by the County to recognize that these issues exist and to find ways to identify and rectify them.

**Recommendations:**

- (1) Expand collaboration to ensure to inclusion of the widest spectrum of the housing community to develop strategies to improve outcomes of underserved populations.
- (2) Develop and Nurture Non-Profit Partnerships to assist in meeting the needs of vulnerable citizens by devising a collaborative plan that will engage the County

with its local nonprofit service providers to identify needs and present action steps to address the needs.

- (3) Translate all notices, document, and forms into the most commonly spoken languages to encourage all citizens to participate fully in the community.
- (4) Increase Outreach to Non-English-speaking populations

### **Impediment #8: Pre-Requisites for Rental Housing**

Difficulty finding a unit is exacerbated by being low income, having poor credit and/or having accessibility needs. Rental requirements and qualifications such as income and credit rating requirements, as well as the prohibitive cost of application fees and security deposits are major barriers to accessing affordable housing.

#### **Recommendations:**

- (1) Examine credit policies of property owners
- (2) Examine the relationship between income and housing unit affordability of property owners.
- (3) Explore the possibility of creating laws to impose on owners of rental property to incentivize them to relax some of the restrictions used to exclude potential residents. Source of income protections are invaluable in maximizing a voucher family's ability to secure safe and decent housing.

## **Conclusion**

Through this Analysis of Impediments to Fair Housing Choice, barriers have been identified which restrict housing choice available to residents of Gwinnett County and limit their access to fair and equitable treatment under the law. It is imperative that

residents know their fair housing rights and that those providing housing, or related services, know their responsibilities. Gwinnett County will work diligently toward achieving Fair Housing Choice for their residents using the recommendations provided herein to address the identified impediments. However, it should be noted that overcoming these impediments would require cooperative efforts from the private and public sectors.

The recommendations proposed in this document address impediments relative to the limited supply of decent affordable housing, accessibility and mobility issues, restrictive zoning provision, resident viewpoints on affordable housing, deficiency of fair housing education, and underserved populations. Implementation of the recommendations can assist Gwinnett County in achieving the reality of being an open and inclusive community that truly embraces Fair Housing Choice for all its residents.

Gwinnett County's Community Development Program currently relies exclusively on federal funding from the U.S. Department of Housing and Urban Development (HUD) and the program income that is generated to administer the housing and community development programs the County offers. With federal funds under constant threat of being reduced or eliminated, every effort must be made to diversify and leverage the dollars that are being received.

Through diversification and leveraging Gwinnett County will be able to facilitate addressing the impediments identified in this analysis and making a positive impact on the community. This effort, however, cannot concentrate solely on the leveraging of other federal funds or grant dollars. Public-private partnerships need to be explored, work with quasi-governmental agencies needs to be studied, and, most importantly, collaboration between a wide range of parties must occur.