

City of Roswell, Georgia

Analysis of Impediments to Fair Housing Choice

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1 Executive Summary

Each year, the U.S. Department of Housing and Urban Development (HUD) requires Community Development Block Grant (CDBG) entitlement grantees, such as The City of Roswell, to submit a certification that they will affirmatively further fair housing, and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1968 and the Fair Housing Act as amended in 1988, which prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property.

Local entitlement communities meet this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI) within their communities and developing and implementing strategies and actions to overcome any impediments to fair housing choice based on their history, circumstances, and experiences. Through this process, local entitlement 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. City of Roswell staff worked together with WFN Consulting to perform this analysis.

Historical Overview

Roswell, Georgia, established in 1854, is located on the northern banks of the Chattahoochee River in an area the Cherokee Indians once called "Enchanted Land". Originally, the land now known as Roswell was inhabited by the Cherokee who were an extremely progressive tribe of Native Americans. The City's founder, Roswell King established the Roswell Manufacturing Company and built a textile mill. The City was directly impacted during the Civil War with the mill being destroyed by Union Soldiers. After the war, the mill was rebuilt and the textile industry played an intricate role in Roswell's economic growth until 1975.

Roswell is now recognized as the eighth largest city in Georgia and the third largest city in Fulton County. The City has enjoyed a significant population increase over the last 20 years with its population nearly doubling from 1990 to 2010. The City has been chosen twice by Atlanta Magazine as the best place to live in Metro Atlanta area. According to City Crime Rankings, Roswell was ranked as one of the safest cities to live in the United States. Roswell was also awarded the City of Excellence Award from the Georgia Municipal Association.

Demographics

The City of Roswell had a combined total 2010 Census population of 88,346. Roswell experienced population growth of 11.9% between 2000 and 2010, while surrounding metropolitan jurisdictions held relatively steady or lost population.

The major racial groups in Roswell, based upon the 2006-2010 ACS estimates, consist of 74.7% White, 11.7% Black or African American, and 4% Asian. The Hispanic or Latino population in Roswell is 16.6% of the population.

Economic Analysis

According to the 2010 Census, the median family income in Roswell was \$95,681, and the median household income was \$67,368. Males had median earnings of \$63,036 compared to \$41,877 in median earnings for females. By comparison, the median family income in 2010 was 11.3% higher than its level in the year 2000 at \$85,946. Also, the median household income in 2000 was \$71,726, showing a 6% decrease in 10 years.

The unemployment rate in the City of Roswell doubled from 2006 to 2009 as job growth slowed. The annual unemployment rate from 2009-2011 remained unchanged at 7.8%, which was less than the national average during this period of 9.3%. There was a downward shift in unemployment rates in 2012 to 7.1%. According to the 2010 Census, 3.3% of families and 6.2% of residents of the City of Roswell earned incomes below the poverty level. While only 0.6% of residents over the age of 65 earned incomes below the poverty level.

The City of Roswell's workforce is comprised of 86.6% private wage and salary workers, 6.6% government workers, and 6.8% self-employed business owners. The largest sector of the workforce in Roswell [professional, scientific, management, and administrative and waste management services] consists of 18.7% of the total workforce. Retail trade represents 16.1% of the workforce and is followed closely by educational services at 13.6% of the workforce.

Public Schools

The public schools within the City of Roswell are part of the Fulton County School System. There are 14 public schools in Roswell: two high schools, two middle schools, eight elementary school, one Academy/Charter school (K-5) and one Second Chance/ Alternative School (6th-12th) for North Fulton County.

Roswell High School failed to meet Adequately Yearly Progress (AYP) for the 2010-2011 school year due to the inadequate Hispanic graduation rate. Centennial High School failed to meet AYP due to the graduation rate of economically disadvantaged students. An economically disadvantaged student is defined as a student who is a member of a household that meets income eligibility guidelines for free or reduced-priced meals [less than or equal to 185% of Federal Poverty Guidelines] under the National School Lunch Program. The state average for students who are economically disadvantaged is 58.7%, while Fulton County is 44.7%, placing City of Roswell schools well below average (22%-30%) for number of students that are economically disadvantaged.

Protected Class Analysis

According to 2010 estimates, 25.3% of City of Roswell residents belong to a minority group. According 2010 estimates, the Asian population represents 4% of Roswell's total population and the Black population represents 11.7% of the population. Hispanic persons of any race make up 16.6% of the Roswell's population.

In 2000, there was a 50/50 male to female ratio within the City of Roswell. As of the 2010 Census, female population increased by 5,133 which increases the female percentage to 50.7% female residents in the City of Roswell.

Of the 46,868 households reported in the 2010 Census for Roswell, over 70% of them were family households. In addition, nearly two of every ten households were households headed by single women. Single women headed nearly 30% of all households in Roswell. The census tracts with the highest percentage of female headed households are 114.20 (29.5%) and 114.21 (27.4%).

During 1980, within City of Roswell, the average African American head of a household lived in a neighborhood (census tract) that was only 96.3% white. This had decreased to 55.9% by the year 2010, as blacks became more isolated. For the average white household, the head of that household in 1980 resided in an area that was only 1.6% African American, but this index had increased to only 10.4% by 2010. Asians were more exposed to white neighbors (67.9% in 2010).

Fair Housing Complaints

Households in the City of Roswell may file their fair housing complaints at Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) regarding alleged violations of the Fair Housing

Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence. The data consist of the number of complaints filed by location in which the alleged discrimination occurred, the status of the complaint, and the basis for the complaint.

From January 1, 2001 and August 31, 2012 there were 24 housing complaints filed in Roswell. Of these complaints, seven were determined to have cause and four of the complaints were settled through conciliation with one complaint being awarding a total settlement amount of \$10,000. Only one of the “with cause” complaints was withdrawn after resolution. As of August 31, 2012, all 24 FHEO complaints have been closed. The complaints as presented from the FHEO are found in full in the Appendix.

Fair Housing Education

Public awareness of fair housing issues and laws ensures that citizens know their rights and what to do if their rights have been violated. 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. The City of Roswell does not have any organization solely dedicated to providing fair housing education to residents of the City; there are organizations that receive complaints if a citizen feels they have been discriminated against. The US Department of HUD Region IV Office of Fair Housing and Equal Opportunity (FHEO) receive complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Georgia, Florida, Alabama, Mississippi, Tennessee, Kentucky, North Carolina, and South Carolina. In 2012, FHEO conducted a Fair Housing Symposium in the City of Roswell to provide education of Fair Housing laws to service providers, housing providers, and jurisdiction representatives. This event was one of the first Fair Housing education sessions in the City, but was ultimately poorly publicized.

Based on the responses derived from the Fair Housing Survey conducted in conjunction with this Analysis, 247 out of 267 [93.0%] survey respondents stated they had never experienced housing discrimination. While 20 [7.0%] of respondents reported that they had experienced housing discrimination

Affordable Housing Snapshot

Housing affordability is a significant factor for residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30% of a family's income¹. Households that spend over that threshold tend to lack affordable housing and may be significantly cost burdened and may have difficulty affording basic necessities.

As of the 2010 Census, the City of Roswell had a total of 36,344 housing units, of which 2,399 [6.6%] were vacant, a significant increase from 2000. As indicated by the 2000 Census figures, the City of Roswell only had 31,300 housing units, of which 1,093 [3.5%] were vacant. According to the 2011 ACS estimates, the number of total housing units in the City has slightly decreased.

According to the 2011 ACS, the median value for a home in the City of Roswell was \$274,300 with 8,597 [39%] of homes ranging in value between \$200,000 and \$299,999. The second most

¹ U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/index.cfm>

common range of home values was \$300,000 to \$499,999, comprising 33% of all owner-occupied units. Approximately 17,392 [78.9%] of all homes within the City were valued at over \$200,000.

Roswell has a significant number of households spending more than 30% of their annual household income on housing-related costs. According to the 2011 ACS, 34.2% of homeowners with a mortgage and 56.9% of renters in Roswell paid more than 30% of their income on monthly housing costs.

Infrastructure

Public transportation can play a significant role in increasing access to the supply of affordable housing to groups in need and others protected under fair housing laws. But if public transportation from a lower cost neighborhood is inefficient in providing access to employment centers, that neighborhood becomes inaccessible to those without dependable means of transportation, particularly very low-income residents, the elderly, and persons with disabilities.

Except for bus service provided by MARTA within parts of Roswell, there is no public transit system within the City.

While Roswell does not operate a public transit system, other transportation modes exist, such as driving, carpooling, biking and walking. The most common choice for commuting to work is driving alone. According to the 2010 American Community Survey estimates, 79.7% of workers using a private automobile for daily transportation to work from within Roswell.

Land Use & Zoning

Comprehensive planning is a critical means by which governments address the interconnection and complexity of their respective jurisdictions. The interconnectedness of land uses means that decisions regarding land use and zoning can have profound impact on affordable housing and fair housing choice. Comprehensive planning, zoning, and growth controls have the potential to greatly affect the availability of fair housing, both positively and negatively.

A number of factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce development costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. Minimum required densities in multi-family zones ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for multi-family uses.

However, the City's zoning ordinance in regards to the definition of family is not conducive towards occupancy standards for affordable housing. The definition of "family" identified in the City's zoning code is a restrictive definition, which limits the number of unrelated persons who may live together. In addition, it also restricts the ability of residents to live with roommates or aides to increase the affordability of housing. This prohibition is a significant barrier to the development and siting of any housing for residents with disabilities in Roswell. The City's zoning ordinance does not include provisions for group homes. Group living arrangements are often necessary to enable people with disabilities to secure the support they need to live in the community.

The current zoning definitions for the City does not contain language referring to "affordable housing". An adequate supply of affordable housing, both for ownership and rental, is essential for an open and inclusive housing market in Roswell. Affordable housing is generally defined by HUD as housing costs that are no more than 30% of a household's gross annual income. According to the 2011 ACS, 34.2% of homeowners with a mortgage and 56.9% of renters

in Roswell expended more than 30% of their income on monthly housing costs in short, over a third of Roswell's households reside in unaffordable housing, resulting in harm to their overall economic well-being.

Current Impediments and Recommendations

This analysis has revealed impediments to fair housing choice in Roswell. In this section, the three overarching 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 systemic and will require effort from both private sector and public sector actors to correct. The City of Roswell has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

Impediment #1: Lack of Available Land limits Development of New Affordable Owner-Occupied and Rental Housing

In recent years, the City has experience a significant population growth, which has led to a robust private housing market that has increased the cost of housing for owners and renters in Roswell. According to HUD, in 2012 the City of Roswell had a median family household income (MFI) of \$69,300, while the median value for a single-family home in Roswell was \$274,300. Currently, Roswell has a significant percentage of homeowners spending more than 30% of their annual household income on housing-related costs. According to the 2011 ACS, 34.2% of homeowners with a mortgage pay more than 30% of their income on monthly housing costs. Conversely, 56.9% of renters spent more than 30% of their income on rent. While a much higher percentage of renters are cost burdened than owners, this lack of affordability does not appear to trend toward any particular type of community, but rather is an equal-opportunity statistic spread throughout the City. In addition, the City also has limited number of subsidized and tax credit housing designated specifically for seniors and disabled persons.

Recommendations:

The City of Roswell must actively address the need to increase the supply of affordable rental and owner-occupied housing by expanding incentive programs that encourage and enable more private developers to create affordable housing. In an effort to address this impediment, the City has allocated \$177,587 of its Program Year 2013 CDBG funding and \$50,000 in HOME Program Funds as gap financing in a Low Income Housing Tax Credit (LIHTC) application for the Roswell Housing Authority.

The City of Roswell should continue its support of LIHTC programs as well as continue its participation with Georgia Initiative for Community Housing (GICH) through the Georgia Department of Community Affairs, which is a three-year program of collaboration and technical assistance to assist the City in addressing their housing and neighborhood revitalization needs.

Impediment #2. Zoning Restrictions

The City's zoning ordinance in regards to the definition of family is not conducive towards occupancy standards for affordable housing. The definition of "family" identified in the City's zoning code is a restrictive definition, which limits the number of unrelated persons who may live together. In addition, it also restricts the ability of residents to live with roommates or aides to increase the affordability of housing. The City's zoning ordinance also does not include provisions for defining group homes or "affordable housing". Group living and affordable housing arrangements are often necessary to enable people with disabilities to secure the support they need to live in the community. A key indicator of housing affordability is reflective of residents housing expenditures that exceed 30% of household income.

Recommendations:

It should be noted that the zoning impediments identified in this analysis reflect potential fair housing concerns that should be monitored by the City of Roswell and are only recommendations to affirmatively further fair housing in Roswell. It is recommended that the City's Community Development Department conduct further studies to review and revise the zoning ordinance definition to include provisional zoning exceptions for families, group homes and homeless shelters. The City should establish a definition of affordable housing within the City of Roswell using accurate and reliable indicators such as income of City residents, quality of housing units, and the availability of housing. Using this new definition, the City and conduct an accurate assessment of its livable and affordable housing supply.

The City of Roswell is proactively addressing the implications for zoning revisions to include the definition of familial status and affordable housing by conducting a thorough assessment of its Unified Development Code (UDC). The zoning revision process began in May 2012 and is expected to be completed by January 1, 2014.

Impediment #3: Lack of Fair Housing Education, Testing and Enforcement Capacity

Education and awareness of fair housing laws are imperative to alleviating housing discrimination and should be an ongoing activity if it is to address the lack of general awareness concerning Fair Housing issues among residents and professionals in Roswell. Additionally, fair housing education must be presented in a manner that is linguistically appropriate and culturally sensitive. Coordination among fair housing organizations is a key component to educating the public about housing discrimination and fair housing rights. Roswell is indirectly served by only one organization whose mission involves fair housing education, testing and enforcement. Based on the results of the Fair Housing Survey, 62.7% of Roswell residents are somewhat knowledgeable of their fair housing rights. Of those residents who reportedly faced housing discrimination but chose not to file a complaint, the predominant reason for not filing was that "they didn't know what good it would do" (45%) followed by "not knowing where and how to file a complaint if they feel their rights have been violated" (30%) and "fear of retaliation" (20%).

Recommendations:

The City of Roswell should annually reserve a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing testing program in Roswell. As an additional component of the Fair Housing Grant, the successful applicant should launch and sustain a robust public interest ad campaign to increase the public's awareness of housing discrimination and of the process for filing a complaint and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse. The City of Roswell should sponsor specific education opportunities on Fair Housing Act compliance for landlords, builders, real estate agents, and the public at large, making periodic training participation mandatory for City staff and entities contracting with the City.

Conclusion

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified which restrict the housing choice available to residents of Roswell and further prevent them from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. Roswell will work diligently toward achieving Fair Housing Choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct.

2 Introduction

Each year, the U.S. Department of Housing and Urban Development [HUD] requires Community Development Block Grant [CDBG] entitlement grantees, such as the City of Roswell, to submit a certification that they will affirmatively further fair housing, and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1968 and the Fair Housing Act as amended in 1988, which prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property.

Title VIII of the Civil Rights Act of 1968, as amended, commonly known as the Fair Housing Act, prohibits discrimination in the sale or rental of housing on the basis of 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 on the basis of familial status and disability.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing².

Local entitlement communities meet this obligation by performing an "Analysis of Impediments to Fair Housing Choice Plan" (abbreviated "AI") within their communities and by developing and implementing strategies and actions to overcome these barriers based on their history, circumstances, and experiences. In other words, the City of Roswell will define the problems, develop the solutions, and be held accountable for meeting the standards set for itself. This Analysis of Impediments identifies the impediments to fair housing choice in the jurisdiction, assesses current fair housing initiatives, and describes actions the jurisdiction will take to overcome the identified impediments. By taking actions that address the impediments, HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through this process, Roswell promotes fair housing choices for all persons, to include Protected Classes, as well as provides opportunities for racially and ethnically inclusive patterns of housing occupancy, identifies structural and systemic barriers to fair housing choice, and promotes housing that is physically accessible and usable by persons with disabilities.

² U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) Program grantees to document AFFH actions in the CDBG and Comprehensive Housing Affordability Strategy (CHAS) annual performance reports that are submitted to HUD.

3 Definitions & Data Sources

As defined in *The Fair Housing Planning Guide*, the definition of “Affirmatively Further Fair Housing” [AFFH] requires a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis;
- Maintain records reflecting the analysis and actions taken in this regard³.

As described in *The Fair Housing Planning Guide*, the CHAS statute at Section 104(21) defines the term “certification” within the context of the Certification to Affirmatively Further Fair Housing [AFFH] to be:

- 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 comment⁴.

In carrying out its local Analysis of Impediments to Fair Housing Choice, the City of Roswell utilized the following definition of “Fair Housing Choice” as outlined by HUD:

- 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 handicap.

As defined in *The Fair Housing Planning Guide*, the definitions of impediments to fair housing choice include:

- 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 origin⁵.

In carrying out its local Analysis of Impediments to Fair Housing Choice, the City of Roswell utilized the following definition of Protected Classes:

- 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.

Roswell does not have a specific definition of “affordable”. The definition used throughout this analysis is congruent with HUD’s definition:

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume I (Chapter I: Fair Housing Planning Historical Overview, Page 14)*. March 1996.

⁴ Ibid. Page 16.

⁵ Ibid. Page 26.

- The U.S. Department of Housing and Urban Development (HUD) defines "affordable" as housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.
- Rental housing affordable to a low-income family of four (income up to 80% of the area median income) residing in the City of Roswell would carry a total monthly cost of up to \$1,386 as noted by the National Low Income Housing Coalition's 2010 Out of Reach Data.

Data Sources Used in This Analysis

Census Data – Data collected by the Decennial Census for 2010, 2000, and 1990 is used in this Analysis (Census 1990 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:

- Summary File 1 (SF 1) – This dataset contains what is known as "100% 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 very 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.
- Summary File 3 (SF 3) – Containing sample data from approximately one in every six US households, this dataset is compiled from respondents who received the "long form" Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value.
- 1990 Census Summary Tape File 1 (STF 1) – Comparable to the 2010 and 2000 SF 1, this dataset contains "100% data" collected from every household that participated in the 1990 Census and is not based on a representative sample of the population. Only basic characteristics such as age, sex, and race are contained in this dataset.
- 1990 Census Summary Tape File 3 (STF 3) – Comparable to the 2000 and 2010 SF 3, this dataset contains sample data from the approximately one in every six US households who received the "long form" Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value.

American Community Survey [ACS] – The American Community Survey is a relatively new component of the Decennial Census program that collects population and housing data every year, thus providing communities with more current data throughout the 10 years between censuses. ACS data is compiled from an annual sample of approximately 3 million addresses. This data is released in two different formats: single-year estimates and multi-year estimates.

- 2011 ACS 1-Year Estimates – Based on data collected between January 2011 and December 2011, these single-year estimates represent the most current information available from the US Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.

- 2006-2010 ACS 3-Year Estimates – More current than Census 2000 data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. It contains data collected between January 2007 and December 2009 and is 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 2012 & 2011 Census Reports – Beginning with calendar year 2012, Census Reports are based on 2006-2010 5-year estimate American Community Survey data. The list of MSAs, states, counties, tracts, MSA family incomes, tract family incomes, tract income levels, and income percentages generated using 2006-2010 ACS data is available on the FFIEC website. Census Reports for calendar years 2003-2011 are based on the 2000 Census. While most data fields in the 2011 Reports contain Census 2000 figures, some fields contain more current estimates that are arrived at through data processing by other federal agencies (most notably, a 2012 Estimated Median Family Income both by MSA and by census tract is provided by HUD, using HUD’s own, independent data processes).
- 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 2008 and 2009 data. The most current HMDA data used in this Analysis is based on loan records from the 2010 calendar year.

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

- City of Roswell Fair Housing Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from Roswell residents and non-residents. The survey consisted of 46 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 355 responses, of which 33 were in Spanish, to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the particular question being discussed and may not be a percentage of the full 355 survey respondents.

Stakeholder Interviews – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of non-profit organizations (especially non-profit housing developers), municipal officials, municipal staff, fair housing advocates, members of City Council, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

Public Meetings - The following information, herein defined as the City of Roswell Analysis of Impediments to Fair Housing Choice, was prepared for the purposes as previously described. Therefore, this report seeks to identify impediments and develop a Fair Housing Action Plan of proposed solutions. Many of the impediments identified in this report will require additional research and on-going analysis by the City of Roswell, local community task forces, or local non-profit organizations. This report does not constitute a comprehensive planning guide; it simply

provides analysis as to the current situation and prepares a plan of action to ameliorate existing impediments.

4 Limitations of this Analysis

The following information, herein defined as the City of Roswell Analysis of Impediments to Fair Housing Choice, was prepared for the purposes as previously described. Therefore, this report seeks to identify impediments and develop a Fair Housing Action Plan of proposed solutions. Many of the impediments identified in this report will require additional research and on-going analysis by the City of Roswell, local community task forces, or local non-profit organizations. This report does not constitute a comprehensive planning guide; it simply provides analysis as to the current situation and prepares a plan of action to ameliorate existing impediments.

5 Historical Overview of City of Roswell

Roswell, Georgia is located on the northern banks of the Chattahoochee River in an area the Cherokee Indians once called "Enchanted Land". Originally, the land now known as Roswell was inhabited by the Cherokee who were an extremely progressive tribe of Native Americans. The Cherokee formed a centralized government complete with a constitution. After the discovery of gold in the area, the State of Georgia declared the Cherokee Nation illegal and granted possession of the land to white settlers through a land lottery. The gold rush prompted Roswell King, the City's Founder, from Darien, Georgia to travel north to investigate the land. The natural resources in the area inspired him to envision and build a water-powered mill and a community close by. The City's founder, Roswell King established the Roswell Manufacturing Company and built a textile mill. The City was directly impacted during the Civil War with the mill being destroyed by Union Soldiers. After the war, the mill was rebuilt and the textile industry played an intricate role in Roswell's economic growth until 1975.

Roswell is now recognized as the eighth largest city in the Georgia and the third largest city in Fulton County. The City has enjoyed a significant population increase over the last 20 years with its population nearly doubling from 1990 to 2010. The City has been chosen twice by Atlanta Magazine as the best place to live in Metro Atlanta area. According to City Crime Rankings, Roswell was ranked as one of the safest cities to live in the United States. Roswell was also awarded the City of Excellence Award from the Georgia Municipal Association.

The City of Roswell maintains a Mayor/Council form of government. There is a City Administrator who is a full time employee and serves the Mayor and the Council by carrying out policy and the daily operations of the City. The Mayor and the six Council members are part-time employees. The City of Roswell elects the Mayor and the City Council. The City Council serves among post assignment versus districts while serving staggered four year terms. Council meetings are held on the second and fourth Mondays of the month to address city matters. Within the Roswell City's government, there are eight departments that handle city services. In the eight departments, there are more than 40 divisions and offices.

6 Demographics

According to the 2010 Decennial Census, Roswell had a total population of 88,346, which makes it the 8th largest municipality in the State of Georgia. The City's racial makeup consisted of 74.7% White; 11.7% Black or African American; 0.3% American Indian and/or Native Alaskan; .05% Pacific Islander; 4.04% Asian; 6.62% from other race; 2.5% from two or more races; and 16.6% were Hispanic or Latino of any race. According to the 2010 American Community Survey, there were 32,860 households of which 36% had children under the age of 18 living with them; 55.1% were married couples living together, 9.1% had a female head of household with no husband present, and 31.9% were non-families. This 2010 ACS data shows the average household size was 2.59 persons and the average family size was 3.17 persons.

Table 1: Demographic Profile Highlights

Roswell Demographic Profile Highlights: 2010 U.S. Census Figures	
Total population	88,346
Male	43,555
Female	44,791
One race	86,137
White	66,010
Black or African American	10,373
American Indian and Alaska Native	265
Asian	3,565
Native Hawaiian and Other Pacific Islander	50
Other race	5,846
Two or more races	2,241
Hispanic or Latino	14,699

Source: 2010 Decennial Census of the United States, www.census.gov

Table 2: Historical Demographic Trends

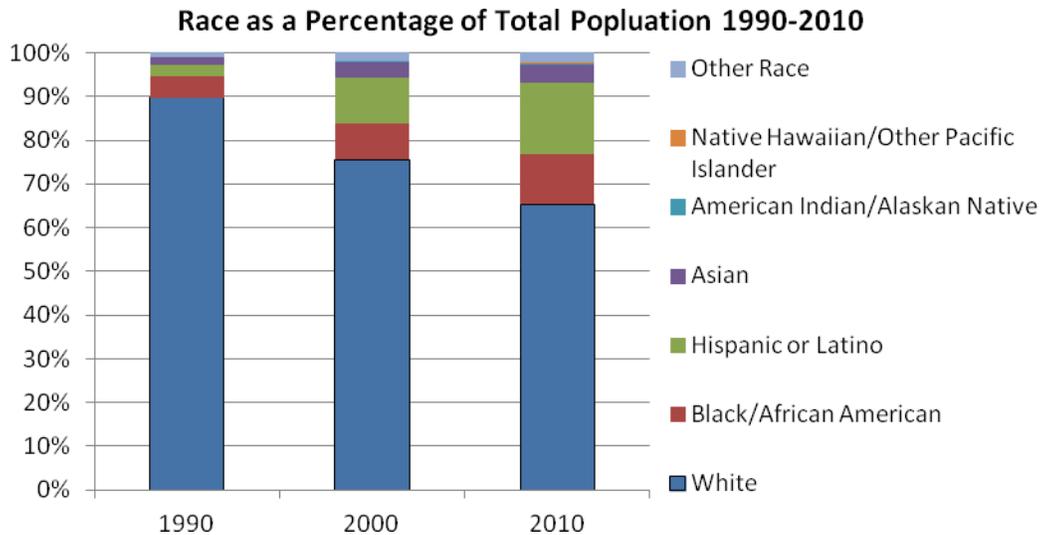
Roswell Historical Demographic Trends							
	White	Black/African American	American Indian/Alaskan Native	Asian	Native Hawaiian/Other Pacific Islander	Other race	Hispanic /Latino
1990	44,162	2,327	64	851	N/A	519	1,285
2000	59,870	6,620	160	2,932	N/A	1,491	8,421
2010	66,010	10,373	265	3,565	50	5,846	14,699

Source: 1990, 2000, 2010 Decennial Census of the United States, www.census.gov

Based on this historical data, between 1990 and 2010, Roswell had an increase of 49.5% among the White population, a 345% increase in the Black or African American population, a 319% increase in the Asian population, a 1,026% increase in the other race population category, and a 1,041% increase in the Hispanic or Latino population. Roswell's total population increased by 84% from the results of the 1990 Census.

The historical shift in Roswell’s racial makeup is depicted in Figure 1 below. Over the 20 year period from 1990 to 2010, evidence demonstrates the increasing diversity that has developed among residents of Roswell. Between 1990 and 2010, Whites consistently made up the largest share of Roswell’s population, although whites saw the lowest percentage increase since 1990 of any race. By comparison, the Hispanic and Latino population increased by 13,414 people from 1990 to 2010, which was the largest increase of any minority population in Roswell. During the same period, minority populations in Roswell have grown at a much higher rate than the white population as shown by all minority categories increasing at five-fold. A variety of economic and other influences may have driven these historical population trends and shifts.

Figure 1: Race as a Percentage of Total Population 1990-2010



Source: 1990, 2000, 2010 Decennial Census of the United States, www.census.gov

Between 1990 and 2010, the percentage of white residents in Roswell increased 10.3%. The comparison of 1990 and 2010 data shows that Roswell’s overall population growth over the last 20 years may be attributed to high rates of growth among minority populations. In 2010, minority populations accounted for over 34.8% of the total population. By comparison, this number was less than 10% in 1990. Roswell has continuously become more racially and ethnically diverse during the last 20 years.

7 Economic Analysis

Household income is the most important factor in determining a household's ability to balance housing costs with other basic life necessities. While economic factors that affect a household's housing choice are not specifically a fair housing issue, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that create fair housing concerns.

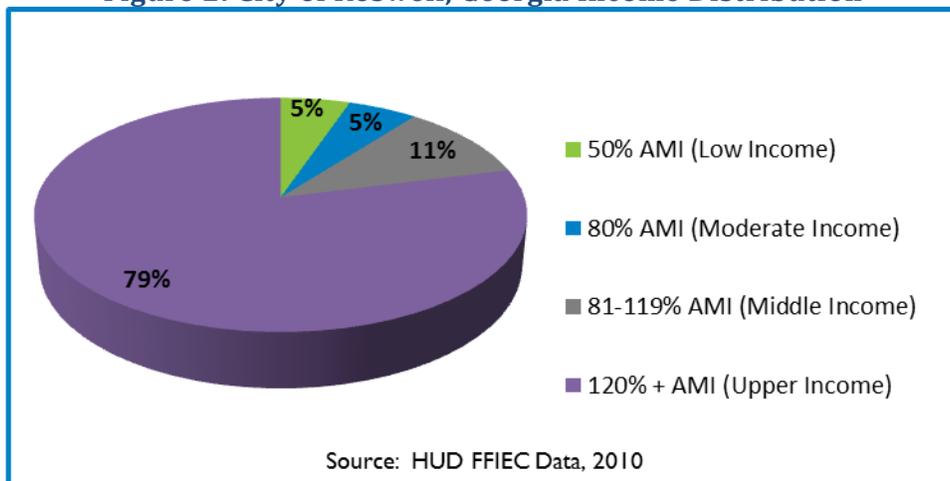
Family and Household Income

According to the 2010 Census, the median family income in the City of Roswell was \$95,681 which was 11.3% higher than its level in the year 2000 at \$85,946. The median household income was \$67,368 in 2010, which was 6% less than the 2000 level at \$71,726. Males had median earnings of \$63,036, while females had a median income of \$41,877.

Each year, HUD establishes the following income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA), which is also shown in the chart below:

- Extremely Low Income (0-30% of AMI)
- Very Low Income (31-50% of AMI)
- Low Income (51-80% of AMI)
- Middle Income (81 - 119% of AMI)
- Upper Income (120% and above of AMI)

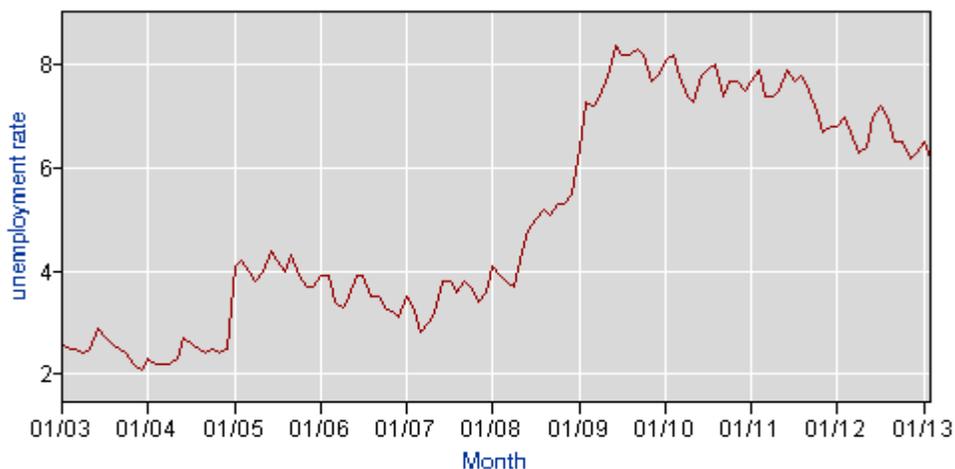
Figure 2: City of Roswell, Georgia Income Distribution



Unemployment

The unemployment rate in the City of Roswell doubled from 2006 to 2009 as job growth slowed. The rates show a steady increase from 2006-2009 peaking at 7.8% which was less than the national average during this period of 9.3%. In 2010, there was a downward shift in unemployment rates from 2010 through 2012 with a low of 6.6%.

Figure 3: City of Roswell, Georgia Unemployment Rate



Note: Unemployment data for 2006-2012 is current as of December, 2012.
 Source: Bureau of Labor Unemployment Statistics – LAUCT13045003

Poverty

According to the 2010 Census, 3.3% of families and 6.2% of residents of the City of Roswell earned incomes below the poverty level. While only 0.6% of residents over the age of 65 earned incomes below the poverty level.

Table 3: Roswell Residents with Incomes below the Poverty Line
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL

All families	3.3%
With related children under 18 years	5.8%
With related children under 5 years only	0.0%
Married couple families	2.8%
With related children under 18 years	4.9%
With related children under 5 years only	0.0%
Families with female householder, no husband present	7.2%
With related children under 18 years	9.6%
With related children under 5 years only	0.0%
All people	6.2%
Under 18 years	7.2%
Related children under 18 years	7.2%
Related children under 5 years only	4.7%
Related children 5-17 years	7.9%
18 years and over	5.9%
18 to 64 years	6.8%
65 years and over	0.6%
People in families	4.3%
Unrelated individuals 15 years and over	16.3%

Source: 2010 American Community Survey 1-Year Estimates, U.S. Census Bureau, www.census.gov

Roswell's Workforce and Industry

The City of Roswell's workforce is comprised of 86.6% private wage and salary workers, 6.6% government workers, and 6.8% self-employed business owners as depicted in the following chart. The largest sector of the workforce in Roswell [professional, scientific, management, and administrative and waste management services] consists of 18.7% of the total workforce. Retail trade represents 16.1% of the workforce and is followed closely by educational services at 13.6% of the workforce.

Table 4: City of Roswell, Georgia Percentages by Industry Sector

Industry	Labor Force	Percent
Class of Worker		
Private Wage and Salary Workers	39,800	86.6%
Government Workers	3,037	6.6%
Self-employed in own not incorporated business workers	3,119	6.8%
Unpaid Family Workers	0	0.0%
Total Private Industry		
Civilian employed population 16 years and over	45,956	100%
Agriculture, forestry, fishing and hunting, and mining	0	0.0%
Construction	2,298	5.0%
Manufacturing	3,691	8.0%
Wholesale trade	1,755	3.8%
Retail trade	7,392	16.1%
Transportation and warehousing, and utilities	1,071	2.3%
Information	2,562	5.6%
Finance and insurance, and real estate and rental and leasing	4,631	10.1%
Professional, scientific, management, and administrative and waste management services	8,579	18.7%
Educational services, and health care and social assistance	6,238	13.6%
Arts, entertainment, and recreation, and accommodation, and food services	4,714	10.3%
Other services, except public administration	2,007	4.4%
Public Administration	1,018	2.2%

Source: 2010 American Community Survey 1-Year Estimates, U.S. Census Bureau

Table 5: Major Employers in Roswell, GA

LARGEST EMPLOYERS IN CITY OF ROSWELL, GEORGIA		
Company	Industry	Total Employees
Kimberly-Clark Corporation	Consumer Products	1,453
North Fulton Regional Hospital	Health Care	1,016
Verizon Wireless	Information	975
Prommis Solutions	Real Estate Financing Processing Services	649
City of Roswell	Government	616

Source: City of Roswell Strategic Economic Development Plan, 2012 <http://www.roswellgov.com>

Education

The public schools within the City of Roswell are part of the Fulton County School System. There are 14 public schools in Roswell: two high schools, two middle schools, eight elementary school, one Academy/Charter school (K-5) and one Second Chance/ Alternative School (6th-12th) for North Fulton County.

Roswell High School failed to meet Adequate Yearly Progress (AYP) for the 2010-2011 school year due to the inadequate Hispanic graduation rate. Centennial High School failed to meet AYP due to the graduation rate of economically disadvantaged students⁶. An economically disadvantaged student is defined as a student who is a member of a household that meets income eligibility guidelines for free or reduced-priced meals [less than or equal to 185% of Federal Poverty Guidelines] under the National School Lunch Program. The state average for students who are economically disadvantaged is 58.7%, while Fulton County is 44.7%, placing City of Roswell schools well below average (22%-30%) for number of students that are economically disadvantaged.

Table 6: Student Demographics for City of Roswell, 2011-2012

City of Roswell High School Demographics: 2011-2012						
	White	Black or African American	Hispanic	Other	Graduation Rate	Economically Disadvantaged
Centennial High School	51%	24%	17%	8%	87.2%	30%
Roswell High School	62%	14%	16%	8%	88.2%	22%

Source: Fulton County School Data Warehouse 2011-2012

The average 2011 SAT scores for City of Roswell exceeded the state average by 1.12% and exceeded the Fulton County average by 1.04%. The SAT scores for Centennial High School were 1591; Roswell High School 1645 compared to Fulton County's SAT score of 1560 and Georgia's SAT score of 1445.

Table 7: SAT Scores for Roswell High School Student Population, 2010-2011

City of Roswell Average SAT Scores Comparison	
School	Score
Centennial High School	1591
Roswell High School	1645
Fulton County	1560
State of Georgia	1445

Source: Georgia Department of Education 2010-2011

Protected Class Analysis

While the baseline demographic data and racial composition statistics provided in the previous sections of this analysis reveal information about the minority concentration in the City of Roswell, they are limited and do not provide a comprehensive snapshot of the City. In order to gain further insight as to the possible segregation of Roswell's population based on race, gender, familial status, national origin, and disability, the following Protected Class Analysis is provided.

⁶ Source for Economically Disadvantaged by State/County – Georgia Partnership Data

Race and Ethnicity

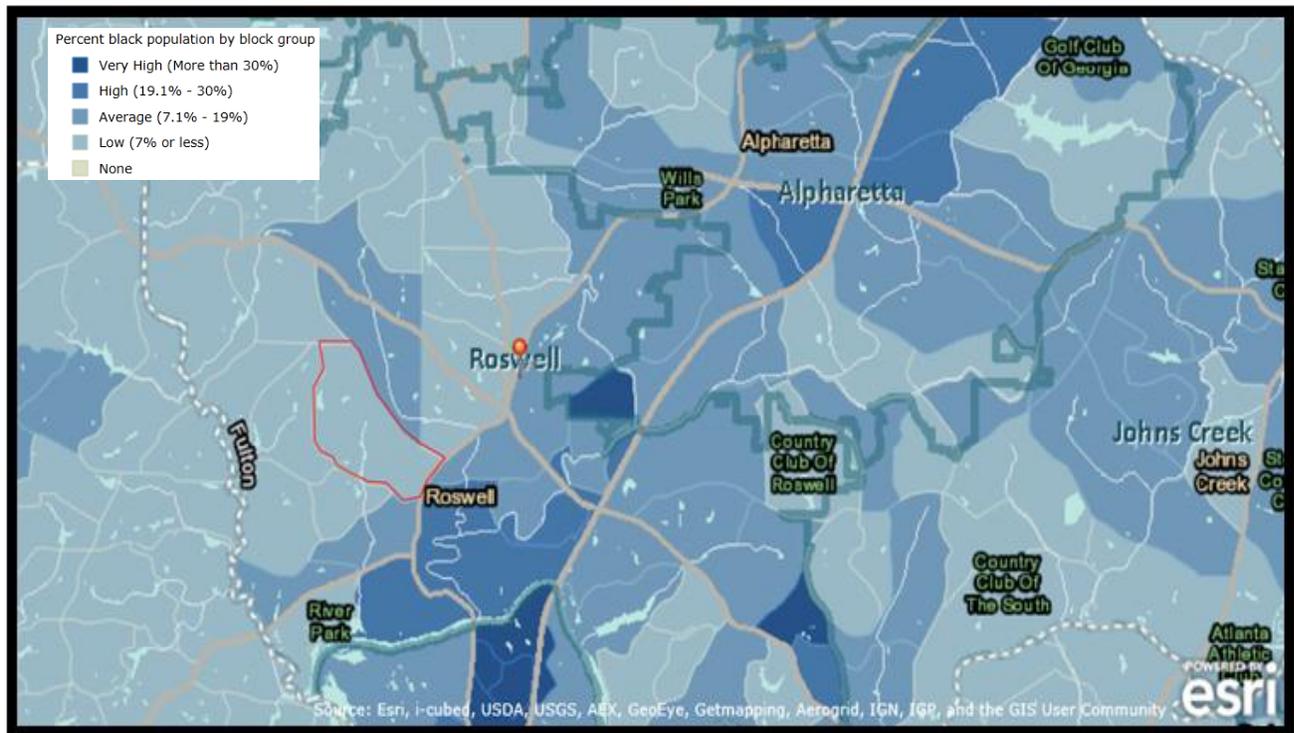
According to 2010 estimates, 25.3% of City of Roswell residents belong to a minority group as depicted in the table below. According 2010 estimates, the Asian population represents 4% of Roswell’s total population and the Black population represents 11.7% of the population. Hispanic persons of any race make up 16.6% of Roswell’s population.

Table 8: Roswell Race Comparisons for Census 2000 and 2010 Population

RACE	2010 Census		2000 Census		2000-2010 Change	
	Counts	Percent	Counts	Percent	Change	Percent
Total Population	88,346	100.00%	79,334	100.00%	9,012	11.4%
Asian alone	3,565	4.0%	2,964	3.7%	601	20.3%
Black or African American alone	10,373	11.7%	6,773	8.5%	3,600	53.2%
White alone	66,010	74.7%	64,666	81.5%	1,344	2.1%
Persons of Hispanic or Latino Origin	14,699	16.6%	8,421	10.6%	6,278	74.6%

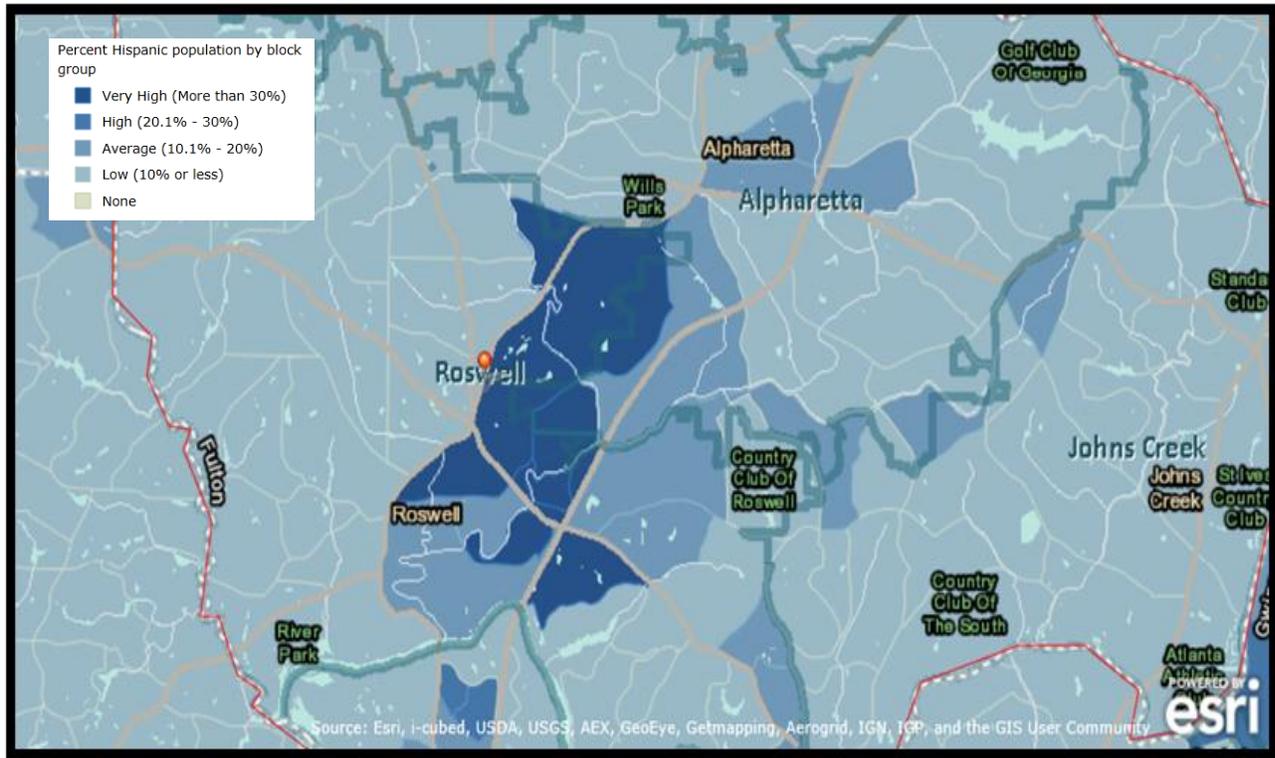
Source: HUD State of the Cities, 2010, 2000 for City of Roswell, GA 2010

Figure 4: Percent African American Population (2011)



Source: ESRI, ArcExplorer, 2012

Figure 5: Percent Hispanic Population (2011)



Source: ESRI, ArcExplorer, 2012

Gender

In 2000, there was a 50/50 male to female ratio within the City of Roswell. As of the 2010 Census, female population increased by 5,133 which increases the female percentage to 50.7% female residents in the City of Roswell.

Table 9: Roswell Gender Comparisons for 2000 and 2010 Census Population

GENDER	2010 Census		2000 Census		2000-2010 Change	
	Counts	Percent	Counts	Percent	Change	Percent
Total Population	88,346	100.00%	79,334	100.0%	9,012	11.4%
Male	43,543	49.3%	39,664	50.0%	3,879	9.8%
Female	44,803	50.7%	39,670	50.0%	5,133	12.9%

Source: U.S. Census, www.census.gov, 2000 and 2010 data sets

Familial Status

Of the 46,868 households reported in the 2010 Census for Roswell, over 70% of them were family households. In addition, nearly two of every ten households were households headed by single women. Single women headed nearly 20% of all households in Roswell. The census tracts with the highest percentage of female headed households are 114.20 (29.5%) and 114.21 (27.4%). There are also several census tracts where there are large percentages of non-family households. The largest of these tracts are 116.11 (47.8%), 114.05 (41.4%) and 114.22 (40.3%). An examination of Census Tract 114.20 demonstrates that there is nearly an average family size of five persons per household.

Census Tract	Total	Family	Percent Family	Female Headed	Percent Female Headed	Nonfamily	Percent Nonfamily	Average Family Size
114.05	2797	1638	58.6	603	21.6	1159	41.4	3.04
114.10	2526	1869	74.0	455	18	657	26	2.93
114.11	2940	2073	70.5	607	20.6	867	29.5	2.98
114.12	3515	2302	65.5	759	21.6	1213	34.5	3.06
114.14	3032	1984	65.4	692	22.8	1048	34.6	3.04
114.16	2029	1510	74.4	352	17.3	519	25.6	3.05
114.17	1964	1231	62.7	288	14.7	733	37.3	2.95
114.18	2190	1684	76.9	386	17.6	506	23.1	2.97
114.19	2342	1460	62.3	407	17.4	882	37.7	2.89
114.20	2157	1498	69.4	636	29.5	659	30.6	3.95
114.21	1597	972	60.9	438	27.4	625	39.1	3.43
114.22	1530	913	59.7	293	19.2	617	40.3	2.94
114.23	1869	1381	73.9	337	18	488	26.1	3.04
114.24	2069	1431	69.2	392	18.9	638	30.8	2.98
114.25	2230	1975	88.6	346	15.5	255	11.4	3.33
114.27	2929	2197	75.0	563	19.2	732	25	3.06
115.03	2884	2499	86.7	432	15	385	13.3	3.31
115.05	1316	1157	87.9	208	15.8	159	12.1	3.37
115.06	2104	1817	86.4	343	16.3	287	13.6	3.16
116.11	2848	1487	52.2	511	17.9	1361	47.8	3.13
Total	46868	33078	70.6	9048	19.3	13790	29.4	-----

Table 10: Family Households in Roswell for Census 2010

Source: www.census.gov

National Origin

The American Community Survey for 2006-2010 estimated that foreign-born residents represented 19.7% of Roswell residents. From the table below, 23.0% of the residents of Roswell speak a language other than English at home.

Table 11: Roswell Foreign Born Population Comparisons 2010

Foreign Born Population-2010	Count or%
Population, 2010	88,347
Foreign born persons, 2006-2010	19.7%
Language other than English spoken at home, age 5+, 2006-2010	23.0%

Source: U.S. Census "Quick Facts," 2000, 2010 (Roswell, GA)

Disability

The 2011 American Community Survey 1-year estimates report that 5.2% of all residents within Roswell are disabled. Seniors who are disabled represent 28.1% of the disabled population.

Table 12: Disability Status (2010) by Sex and by Age

Disability by Sex Category	Age Group			Total
	Under 18	18 to 64	65 and Older	
Male	13,182	29,416	4,178	46,776
With Disability	267 (2.0%)	1,004 (3.4%)	1,215 (29.1%)	2,486 (5.3%)
No Disability	12,915	28,412	2,963	44,290
Female	9,650	28,961	5,486	44,097
With Disability	0 (0.0%)	719 (2.5%)	1,502 (27.4%)	2,221 (5.0%)
No disability	9,650	28,242	3,984	41,876
All Persons	22,832	58,377	9,664	90,873
With Disability	267 (1.2%)	1,723 (3.0%)	2,717 (28.1%)	4,707 (5.2%)
No Disability	22,565	56,654	6,947	86,166

Source: U.S. Census Bureau, 2011 American Community Survey

8 Racial & Ethnic Segregation

When housing policy analysts discuss *residential segregation*, they define it as the predisposition for residents in any two races or ethnicities to live in separate areas. For example, when all or most of the African Americans in a city live in one neighborhood or set of neighborhoods, yet all or most the whites live in other neighborhoods, the city is defined as “highly segregated.”

Segregation can directly affect the quality of life in cities and neighborhoods. As new people come into the area, we need to understand what effect that change will have on the dynamics of the city and its neighborhoods⁷. Reasons other than discrimination can explain or contribute to segregation’s existence, such as personal preference, language differences, immigrant status, education level, and income⁸.

Nationally, Hispanic Americans, Native Americans, and Asian Americans are much less segregated today than African Americans. However, recent research yielded levels of discrimination and “racial steering” against Hispanics, Asians, and Native Americans with this level of discrimination not being as pervasive as the segregation found to occur with African Americans. Interestingly, studies indicate Asian Americans and Hispanic Americans are more segregated from African Americans than they are from whites. Thus, residential segregation has increasingly become a pattern that applies distinctively to African Americans. As indicated by Farley (2010), these findings are consistent with survey data demonstrating that African Americans are less preferred as neighbors by whites, Asians, and Latinos than other groups, although many indicate no preference. Research on segregation, discrimination, and attitudes indicate that there is greater white resistance to black-white neighborhood integration than to integration with Hispanics, Asians, or Native Americans.

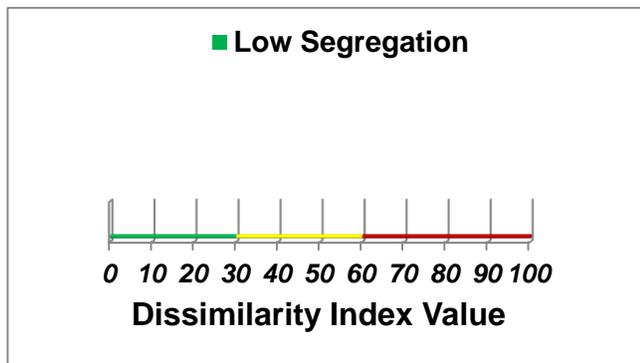
In fact, there could be at least three reasons why these segregated patterns exist: Illegal discrimination in the housing market limits the selection of neighborhoods where persons of a particular race and ethnicity can live; income differences across race and ethnic groups limit the selection of neighborhoods where persons of a particular race and ethnicity can live; and, personal preferences cause individuals to want to live in neighborhoods with others of a particular race and ethnicity.

Douglas Massey and Nancy Denton developed a sophisticated multidimensional analysis of racial segregation as shown in Figure 19 below. The study concluded, “a high score on any single dimension is serious because it removes blacks from full participation in urban society and limits their access to its benefits.” A score between 30 and 60% indicates a moderate level of segregation and above 60% indicates high level of segregation.

⁷ Sawyer, N. and Tatian, P. (2003, October). Segregation Patterns in the District of Columbia: 1980 to 2000. Washington, DC: The Urban Institute.

⁸ Bayer, Patrick, McMillan, Robert, and Rueben, Kim. (2002). What drives racial segregation? Evidence from the San Francisco Bay area using Micro-census data. Retrieved March 1, 2011 from <http://www.economics.utoronto.ca/mcmillan/bmr1.pdf>.

Figure 6: The Index of Dissimilarity - Segregation within Neighborhoods



Source: What drives racial segregation? (2002) <http://www.economics.utoronto.ca/mcmillan/bmr1.pdf>.

The *index of dissimilarity* is the degree to which blacks and whites are evenly spread among neighborhoods and provides “the percentage of all blacks who would have to move to achieve an even, or ‘integrated,’ residential configuration – one where each census tract replicates the racial composition of the metropolitan area as a whole”⁹. Massey and Denton refer to this index as “black-white segregation.” achieve an even racial distribution.

The dissimilarity index equals 0.0, indicating complete integration of the two sub-groups, when all census tracts within the geographic area being analyzed have the same proportion of population sub-group members as in the whole geographic area. The opposite extreme is when the index equals 100.0, indicating complete segregation. In this extreme case, a few census tracts consist entirely of members of one population sub-group, while all the others contain all the members of the other population sub-group. Another perhaps easier way to interpret the value of the index is that it indicates the percentage of either sub-group (e.g., blacks or whites) who would have to move to another census tract for both sub-groups to be distributed evenly to achieve complete integration. In a very segregated environment (D = 100.0), 100% of either sub-group would have to move to achieve complete integration.

Figure 7: Index of Dissimilarity Formula

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

D = the index of dissimilarity for two groups being compared within a specific geographic area
P_{xi} = the population of group x in census tract i
P_x = the total population of group x in the overall geographic area
P_{yi} = the population of group y in census tract i
P_y = the total population of group y in the overall geographic area
Σ = the Greek letter “sigma” indicating the summation of terms

⁹ Massey, Douglas and Eggers, Mitchell. (1993). The spatial concentration of affluence and poverty during the 1970s. *Urban Affairs Quarterly* 29, 299–315.

“The dissimilarity index is limited by the fact that it can only measure segregation between two racial and ethnic groups. Other indices, however, are able to express segregation among multiple populations more completely”¹⁰. Two of these indices are the exposure index and the diversity index.

Racial and ethnic isolation is gauged through an exposure index that measures the extent to which a racial or ethnic group is exposed to members of the group, and to others. It is used to understand whether two groups share common residential areas, and therefore have opportunities for contact. Low exposure indices mean that there is little shared area and few chances for interaction. The highest degree of racial isolation in City of Roswell is among whites.

It is not the size of the region’s minority population that makes it a segregated area, but the distribution of its racial and ethnic groups. A critical indicator of segregation is an index of the level of separation of whites from other races (isolation index). Within the suburban homes, a high percentage of white homeowners live in census tracts where a comparatively small percentage of their neighbors are minorities.

Any thorough study of impediments to fair housing choice must include an analysis of where different types of people live. While the description of past and present patterns of racial, ethnic and income segregation is not conclusive proof of specific acts of illegal discrimination, it can provide important insights into the extent to which discrimination continues to exist, and the degree to which the effects of previous discrimination are being undone. Using census data at the tract level for the years 1980, 1990, 2000 and 2010, dimensions of residential segregation were analyzed.

The exposure index indicates the racial composition of a neighborhood for an “average” member of a particular racial group. It is a weighted average of neighborhood racial composition, where each census tract is weighted by the share of a particular race that lives in that tract. This method is useful in showing changes in one racial group’s exposure to another. This method is also affected by group size. The larger a particular racial group’s share of the population, the more likely its neighborhood is to show higher concentrations of that group’s population. We analyzed the differences between the exposure index in 1980 and 2010 for whites, blacks, Hispanics, and Asians. The neighborhood of a “typical” black person was overwhelmingly black in both 1980 and 2010.

One of the advantages of the diversity index over most other segregation measures is that the overall statistic can be decomposed to analyze how segregation between groups contributes to the overall level of segregation. For instance, for this report we analyzed how much the overall level of segregation in the city consists of whites segregated from the nonwhite population versus segregation among the nonwhite groups. By decomposing the diversity index, we found that segregation between whites and nonwhites was a larger component of segregation in 2010 than segregation among the nonwhite groups.

The integration index provides a better measure of how well multiple groups are integrated with each other. The integration index can be thought of as representing what the typical census tract looks like for the average person in a particular group—an “average person” being a composite of all persons in that group and a “typical census tract” being a composite of all census tracts.

¹⁰ Sawyer, N. and Tatian, P. (2003, October). Segregation Patterns in the District of Columbia: 1980 to 2000. Washington, DC: The Urban Institute.

We use census tracts to represent neighborhoods in our analysis, and all three of our segregation measures compare the racial and ethnic composition of tracts to larger areas.

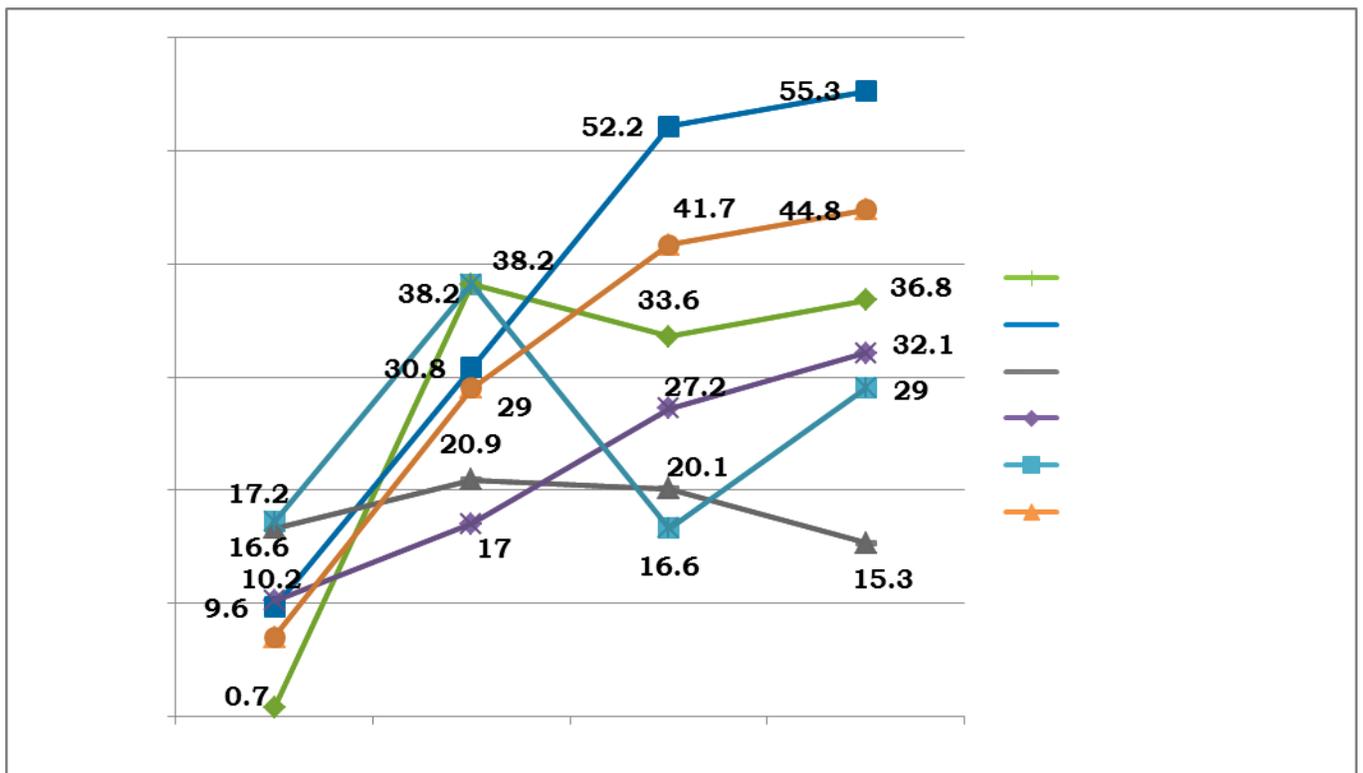
Dissimilarity Index

In 1980, within City of Roswell the dissimilarity index of white with black was 0.652 and it decreased to 0.550 by 2010 (see Figure SA-5). This is interpreted as 55.0% of black residents would have had to move to white areas to achieve the elimination of segregation during the year 2010 within City of Roswell (see Table SA-2).

Table 13: Index of Dissimilarity - City of Roswell

Group Exposure	Dissimilarity Index - Race (1980)	Dissimilarity Index - Race (1990)	Dissimilarity Index - Race (2000)	Dissimilarity Index - Race (2010)
White with Black	0.7	38.2	33.6	36.8
White with Hispanic	9.6	30.8	52.2	55.3
White with Asian	16.6	20.9	20.1	15.3
Black with Hispanic	10.2	17.0	27.2	32.1
Black with Asian	17.2	38.2	16.6	29.0
Hispanic with Asian	7.0	29.0	41.7	44.8

Figure 8: Dissimilarity Index - Race City of Roswell, Georgia (1980-2010)



Exposure Index

Another measure of residential segregation is a class of exposure indices that are the racial/ethnic composition of the tract where the average member of a given group lives. These indices include both the exposure of a race to itself (Isolation Index) and the exposure

of that race to other races (Exposure Index). Both of these indices of exposure range from 0 to 100, where a larger value implies that the average member of that race resides within a census tract that has a greater percentage of residents from other races. These indices depend on two conditions: the overall size of the other group and each group's settlement pattern. Tables 14 through 17 provide the exposure index data for years 1980, 1990, 2010, and 2010.

During 1980, the average African American head of a household lived in a neighborhood (census tract) that was only 96.3% white. This had decreased to 55.9% by the year 2010, as blacks became more isolated. For the average white household, the head of that household in 1980 resided in an area that was only 1.6% African American, but this index had increased to only 10.4% by 2010. Asians were more exposed to white neighbors (67.9% in 2010).

Table 14: Exposure Index 1- City of Roswell,

Group Exposure	Exposure Index 1 - Race (1980)	Exposure Index 1 - Race (1990)	Exposure Index 1 - Race (2000)	Exposure Index 1 - Race (2010)
Black with White	96.3	85.3	65.9	55.9
Hispanic with White	96.2	86.7	55.9	40.1
Asian with White	96.1	89.7	71.8	67.9

Table 15: Exposure Index 2 - City of Roswell,

Group Exposure	Exposure Index 2 - Race (1980)	Exposure Index 2 - Race (1990)	Exposure Index 2 - Race (2000)	Exposure Index 2 - Race (2010)
White with Black	1.6	4.5	7.7	10.4
Hispanic with Black	1.6	7.2	13.6	16.3
Asian with Black	1.6	5.0	10.4	12.0

Table 16: Exposure Index 3 - City of Roswell,

Group Exposure	Exposure Index 3 - Race (1980)	Exposure Index 3 - Race (1990)	Exposure Index 3 - Race (2000)	Exposure Index 3 - Race (2010)
White with Hispanic	1.1	2.6	7.9	10.2
Black with Hispanic	1.1	4.1	16.3	22.1
Asian with Hispanic	1.2	2.9	12.1	14.2

Table 17: Exposure Index 4 -City of Roswell,

Group Exposure	Exposure Index 4 - Race (1980)	Exposure Index 4 - Race (1990)	Exposure Index 4 - Race (2000)	Exposure Index 4 - Race (2010)
White with Asian	0.6	1.8	4.0	4.9
Black with Asian	0.6	1.9	4.9	4.7
Hispanic with Asian	0.7	1.9	4.7	4.0

Figure 9: Exposure Index 1 - Race
Roswell, Georgia (1980-2010)

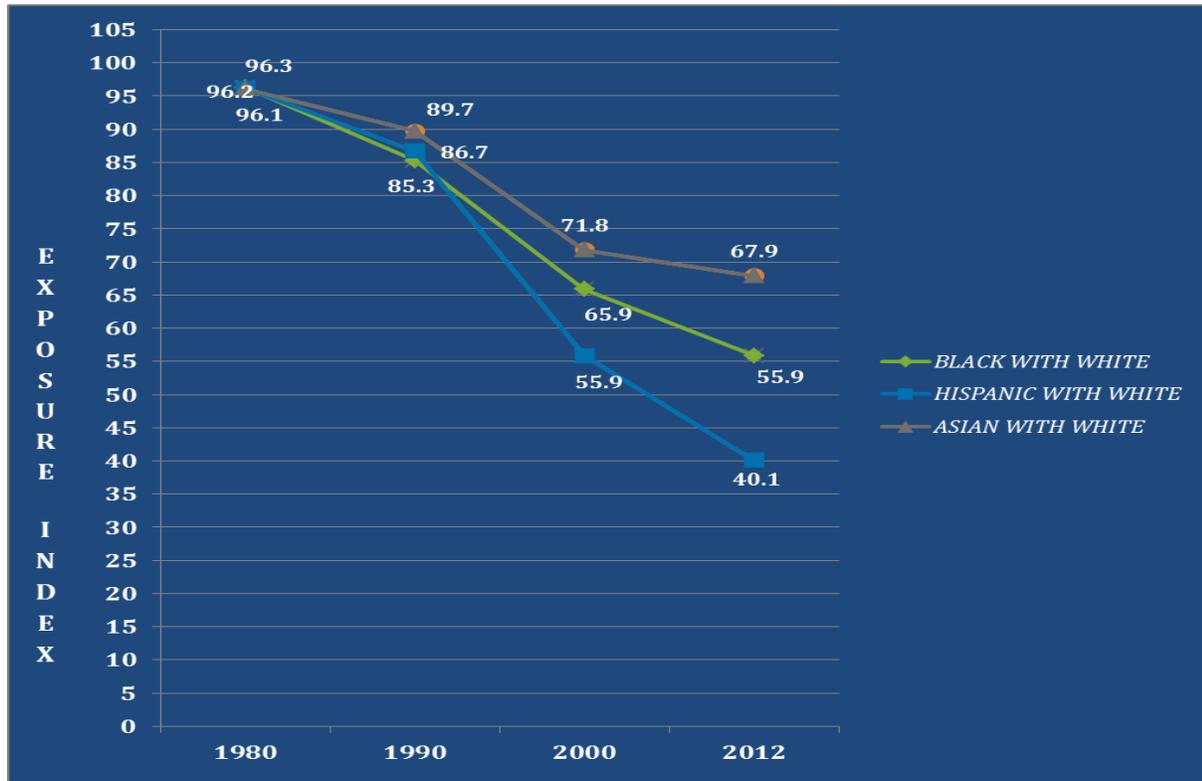


Figure 10: Exposure Index 2 - Race

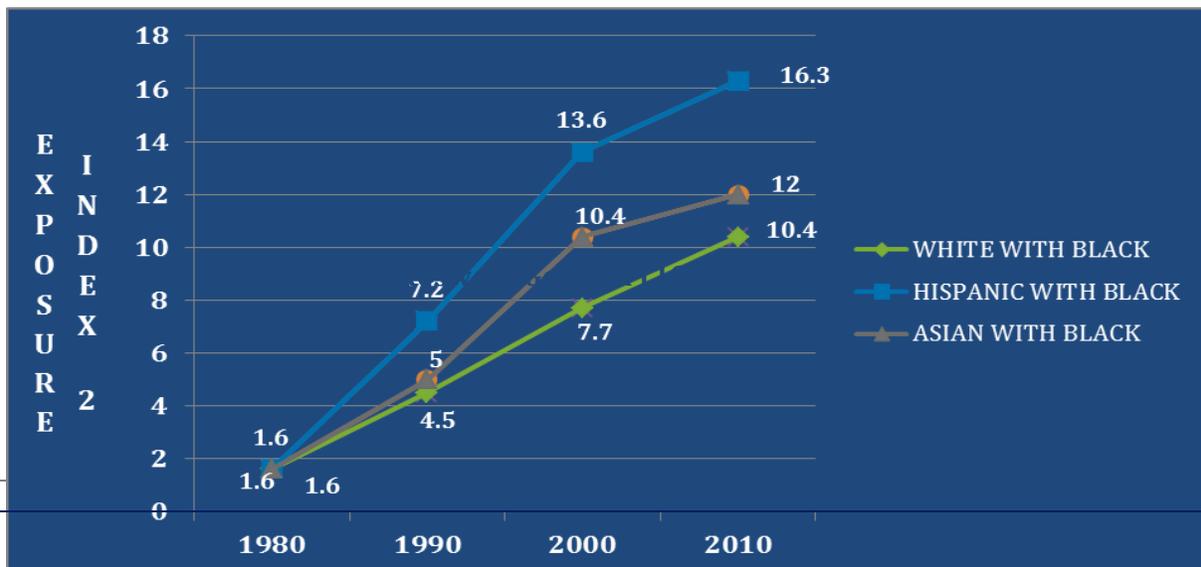


Figure 11: Exposure Index 3 - Race
Roswell, Georgia (1980-2010)

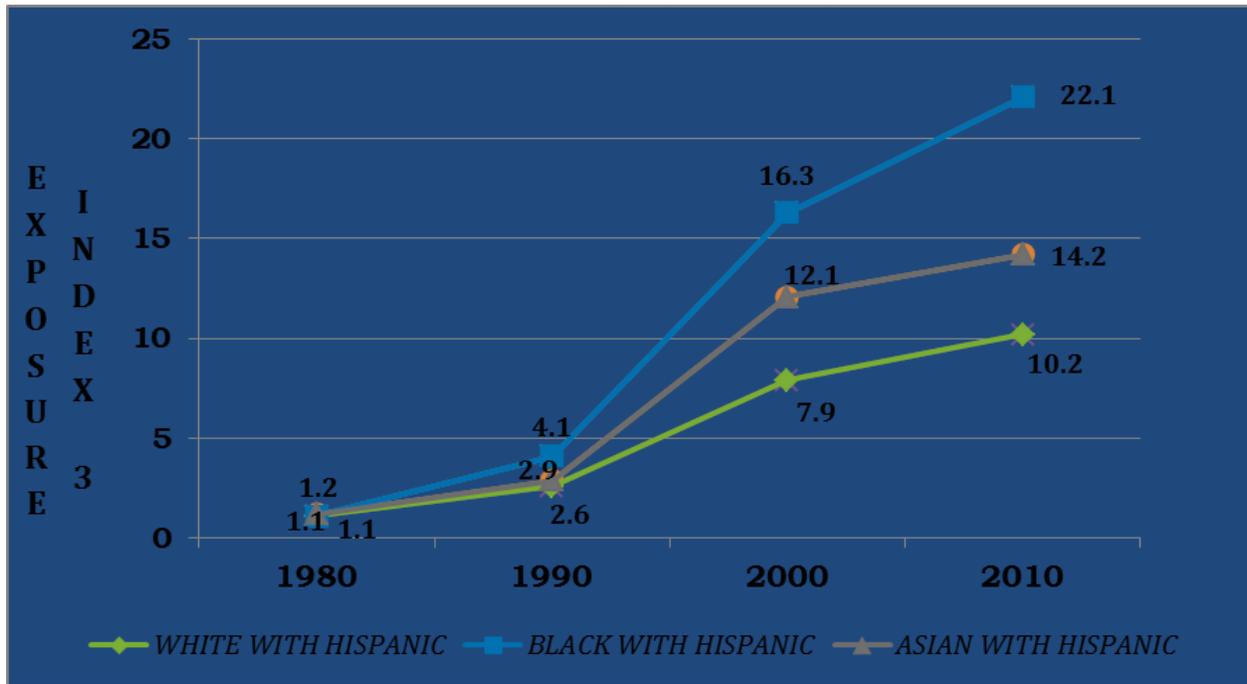
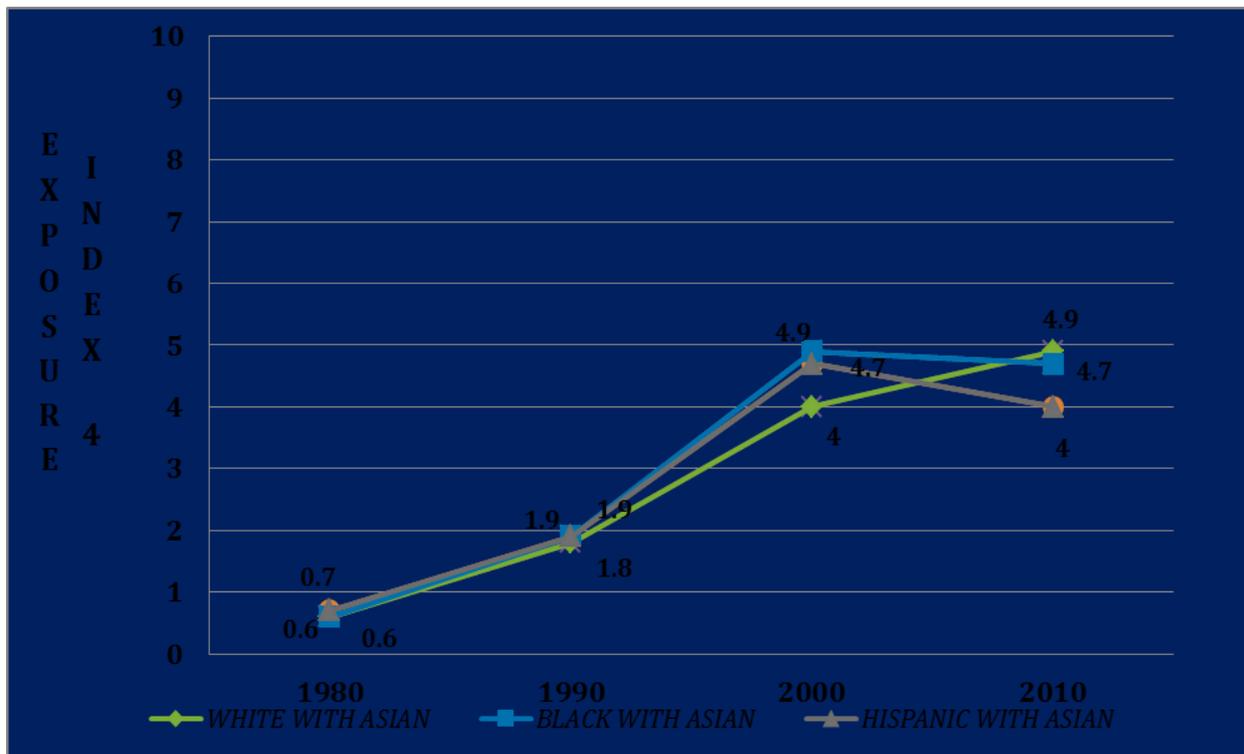


Figure 12: Exposure Index 4 - Race
Roswell, Georgia (1980-2010)



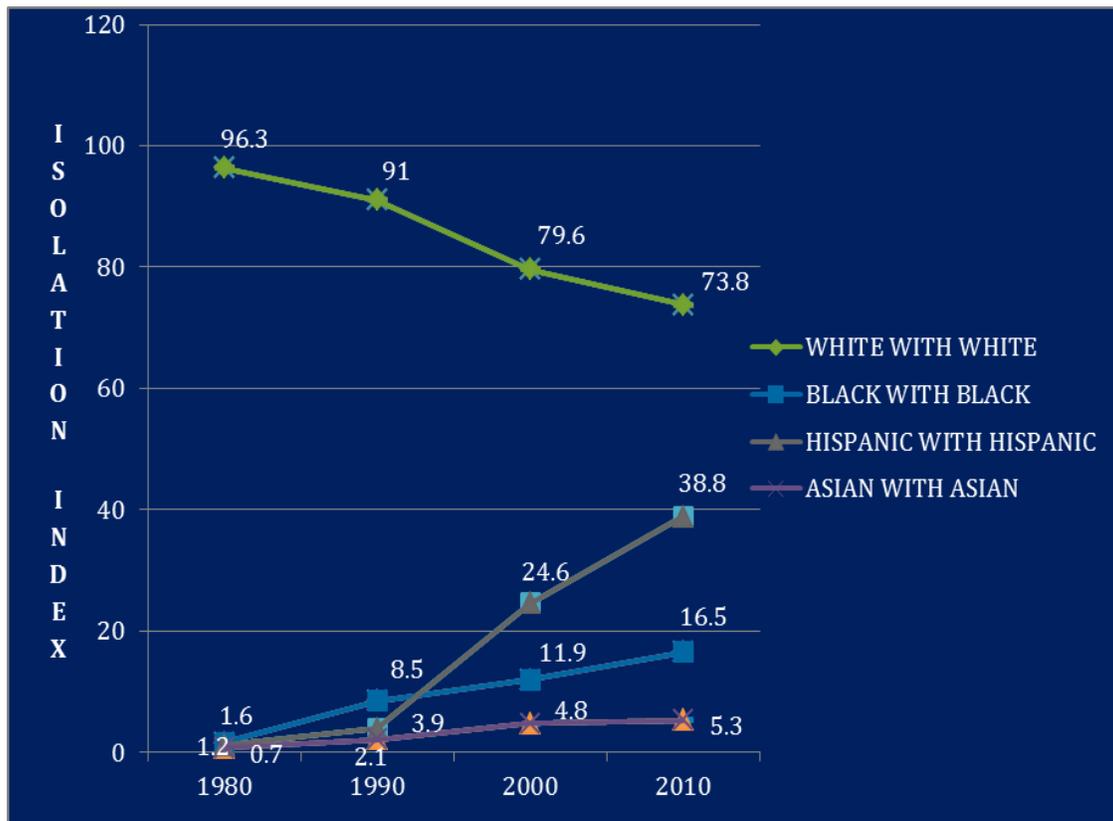
The isolation index is the percentage of “same race” (or age, disability, gender, etc.) in the census tract where the average member of that racial group resides. The isolation index has a range of zero (for a small group that is well dispersed) to 100 (group members are entirely isolated from other groups).

Table 18: Isolation Index - City of Roswell,

Group Exposure	Isolations Index - Race (1980)	Isolations Index - Race (1990)	Isolations Index - Race (2000)	Isolations Index - Race (2010)
White with White	96.3	91.0	79.6	73.8
Black with Black	1.6	8.5	11.9	16.5
Hispanic with Hispanic	1.2	3.9	24.6	38.8
Asian with Asian	0.7	2.1	4.8	5.3

For the City of Roswell, Table 18 notes that the average head of a white household in 1980 was living in a neighborhood that was 96.3% white. This had decreased to 73.8% by 2010, but the index remained unacceptable. By comparison, the average African American resided in a neighborhood (census tract) of 1.6% African Americans and this isolation index increased to 16.5% by 2010. Hispanics experienced a much greater increase in the isolation index (1.2% in 1980 and 38.8% in 2010) and Asians (0.7% in 1980 and 5.3% in 2010) experienced a slight increase in isolation Figure 14.

Figure 13: Isolation Index - City of Roswell,



Summary of Findings

While Roswell has seen a general decline in racial segregation since 1980, Whites and Hispanics have become significantly more segregated. To a lesser degree, Asians have become more segregated as well.

While Asians are more exposed to White neighbors than any other group, the trend has been declining since 1980, as well as Hispanic's exposure to Whites. While having a much lower exposure to White neighbors, the trend for Blacks has been increasing. Hispanics, Whites, and Asians all show a general increasing exposure to Black neighbors. While the rate of exposure is relatively low in all cases, Whites, Blacks, and Asians have seen a sharp increase in exposure to Hispanic neighbors, particularly since 1990.

As a general theme, Whites remain highly isolated, despite a gradual decline in their isolation index since 1980. Asians and especially Hispanics have seen increases in isolation, though both remain by far the minority in their neighborhood. Blacks tend to live in fairly diverse neighborhoods, with the average Black head of household in 2010 residing in a neighborhood that was 38.8% Black.

9

Home Mortgage Data Act (HMDA) Analysis

HMDA is a disclosure statute that facilitates enforcement of the anti-discrimination statutes. Under HMDA, lending institutions are required to annually submit specified data to the Federal Reserve on the disposition of their home loan applications for home loan originations and purchases. Mortgage lenders are required to maintain loan application registers [LARs] which record pertinent data by application and year. The Federal Reserve use this data to generate a series of table that include information on the type of loan, location of property (census tract), race, gender, income of applicant, approval rate, sale of loans, and type of buyer financing. An analysis of Home Mortgage Disclosure Act [HMDA] data from 2008, 2009, and 2010 was analyzed for evidence of disparity in mortgage lending to minorities in Roswell, .

“The United States has enacted a variety of laws making it illegal for lenders to discriminate against members of historically disadvantaged groups, particularly women and minorities. These laws include most notably the Fair Housing Act of 1968 and the Equal Credit Opportunity Act of 1974 (ECOA). ECOA also makes it illegal for lenders to use the racial composition of the neighborhood as a determinant of the lending decision. In addition, policy concern about the viability of urban neighborhoods has generated laws such as the Community Reinvestment Act of 1977 that impose an affirmative obligation on lenders to help meet the credit needs of their entire communities “¹¹.

The Home Mortgage Disclosure Act (HMDA) was passed by Congress in 1975 and amended in 1989. This law mandates that financial institutions such as banks, savings and loan associations, mortgage companies, and credit unions, report information concerning their home lending activity. As promulgated by rules, these lenders must disclose the number of loan applications by census tract, and by the income, race, and gender of the applicant and co-applicant. In fact, the HMDA and other federal non-discriminatory policies related to housing state that these financial institutions make decisions as if they had no information about the applicant's race, regardless of whether race is a good proxy variable for risk factors that a lender cannot distinguish or observe.

The analysis of HMDA data within the City of Roswell will assist local and regional leaders to identify credit needs that are not being met by lenders. Thus, the HMDA analysis will encourage local policymakers, community leaders, and financial institutions to collaborate on marketing to promote affordable lending products that reach protected classes. Each year, the lender must report the number of loan applications it approved and denied. The lender must also indicate how many of its loan approvals not accepted (the institution approved the loan but the applicant refused). Finally, the lender must specify how many applications were withdrawn (the applicant withdrew his application before the bank made a credit decision), and how many applications were incomplete (the applicant did not provide all the necessary information).

While HMDA data alone cannot be used to prove discrimination by banks and other lending institutions, data can be used to determine whether discrimination may be occurring. The data revealed that African Americans (38%) and Hispanics (32%) were more likely to receive a high-cost loan than White borrowers (16%). This analysis also calculated the ratio of denials to the number of loan originations for each race and ethnic group. The data show that while White borrowers received 1.5 denials for every ten originations, Hispanics and African Americans received 4.0 and 3.0 denials for every ten originations, respectively. It is important to note that this analysis does not account for differences in credit risk of the borrower. HMDA data define high cost loans as first mortgages with interest rates 3 percentage points higher than a benchmark rate and second mortgages with interest rates 5 percentage points or higher than a benchmark rate.

¹¹ Ladd, Helen. 1998. Evidence on Discrimination in Mortgage Lending. *Journal of Economic Perspectives* 12:41-62.

Disposition of Loan Applications Reported to HMDA 2008-2010

The figures below display the number and% of applications for loans from The City of Roswell for the years 2008, 2009, and 2010. The greatest percentage of loan applications occurred in 2009 (38.7%).

Table 19: Mortgage Applications by Year, 2008-2010

Year	Frequency	Percent	Valid Percent	Cumulative Percent
2008	5832	27.3	27.3	27.3
2009	8281	38.7	38.7	66.0
2010	7276	34.0	34.0	100.0
Total	21389	100.0	100.0	

Figure 14: Number of Applications by Year, 2008-2010

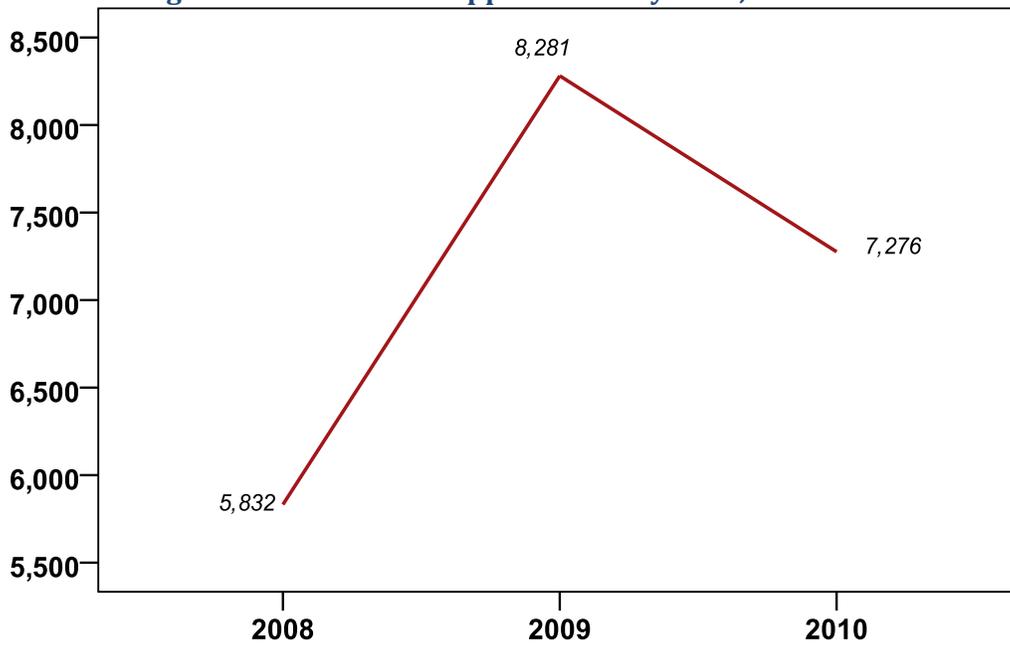
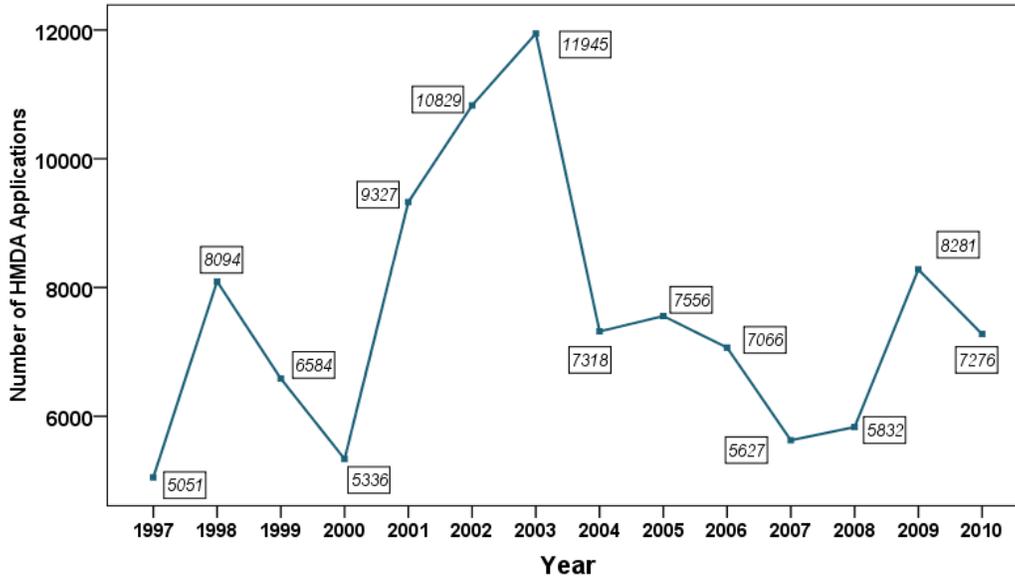


Figure 15: Long-Term Trends in HMDA Applications



From the above figure, it is apparent that the number of HMDA applications follows no linear growth pattern, but has variance non-stationary. The seasonality in the applications filed may be auto-correlated based on unemployment rates, GDP, and other economic factors. Therefore, no linear trend line or forecast can be applied. More advanced statistical analyses using time series transfer functions would be appropriate.

Loan Type

Over eight of ten applications for loans were conventional (85.3%). Most (87.3%) of all loan applications were conventional in 2008. This decreased to 83.0% of all loans in 2010. FHA loans increased over the same three years and VA loan applications more than doubled during the same period.

Table 20: Loans by Type, 2008-2010

Loan Type	Frequency	Percent	Valid Percent	Cumulative Percent
Conventional (any loan other than FHA, VA, FSA, or RHS loans)	18241	85.3	85.3	85.3
FHA-insured (Federal Housing Administration)	2896	13.5	13.5	98.8
VA-guaranteed (Veterans Administration)	251	1.2	1.2	100.0
FSA/RHS (Farm Service Agency or Rural Housing Service)	1	.0	.0	100.0

Loan Purpose

From 2008 to 2010, the majority (over 51%) of loans were for refinancing. In fact, the% of refinancing loans increased from 55.6% of the total loans in 2008 to 70.1% by 2010, while home purchase loans decreased (39.2% to 27.7% of all loans).

Table 21: Loan Purpose by Year

Loan Type	Loan Information	Year			Total
		2008	2009	2010	
Home purchase	Count	2289	1970	2018	6277
	% within Loan Purpose	36.5%	31.4%	32.1%	100.0%
	% within YEAR	39.2%	23.8%	27.7%	29.3%
	% of Total	10.7%	9.2%	9.4%	29.3%
Home improvement	Count	303	174	157	634
	% within Loan Purpose	47.8%	27.4%	24.8%	100.0%
	% within YEAR	5.2%	2.1%	2.2%	3.0%
	% of Total	1.4%	.8%	.7%	3.0%
Refinancing	Count	3240	6137	5101	14478
	% within Loan Purpose	22.4%	42.4%	35.2%	100.0%
	% within YEAR	55.6%	74.1%	70.1%	67.7%
	% of Total	15.1%	28.7%	23.8%	67.7%
Total	Count	5832	8281	7276	21389
	% within Loan Purpose	27.3%	38.7%	34.0%	100.0%
	% within YEAR	100.0%	100.0%	100.0%	100.0%
	% of Total	27.3%	38.7%	34.0%	100.0%

Loan Application Decisions

The distribution of loan amounts appears in the Appendix, with other variable descriptive statistics. The frequency distribution for loan amounts were highly skewed to the right (M=275,700; SD=283,469; Md= 243,000). Nearly nine of ten loan applications (87.8%) required no pre-approvals.

Table 22: Pre-Approval of Loans

	Frequency	Percent	Valid Percent	Cumulative Percent
Preapproval was requested	299	1.4	12.2	12.2
Preapproval was not requested	2155	10.1	87.8	100.0
Subtotal	2454	11.5	100.0	-
Missing - N/A	18935	88.5	-	-
Total	21389	100.0	-	-

Nearly three-fourths of all loans (71.4%) required a secured first lien. Applicants from minority census tracts were more about likely to secure a first lien as show in Figure 3.

Figure 16: Lien Status by Minority Census Tracts

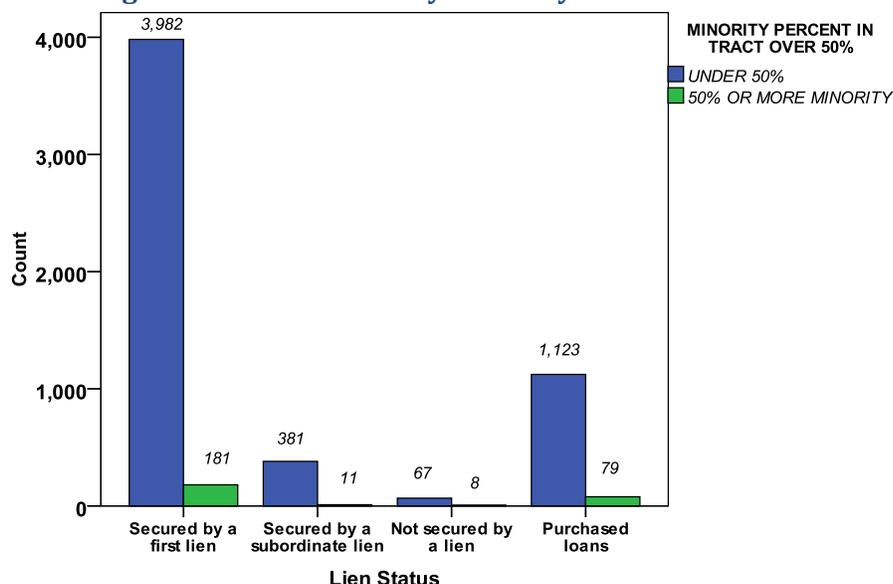


Table 23: Lien Status by Minority Census Tracts

		MINORITY% IN TRACT		Total
		UNDER 50%	50% OR MORE MINORITY	
Secured by a first lien	Count	3982	181	4163
	% within Lien Status	95.7%	4.3%	100.0%
	% within MINORITY% IN TRACT	71.7%	64.9%	71.4%
	% of Total	68.3%	3.1%	71.4%
Secured by a subordinate lien	Count	381	11	392
	% within Lien Status	97.2%	2.8%	100.0%
	% within MINORITY% IN TRACT	6.9%	3.9%	6.7%
	% of Total	6.5%	.2%	6.7%
Not secured by a lien	Count	67	8	75
	% within Lien Status	89.3%	10.7%	100.0%
	% within MINORITY% IN TRACT	1.2%	2.9%	1.3%
	% of Total	1.1%	.1%	1.3%
Purchased loans	Count	1123	79	1202
	% within Lien Status	93.4%	6.6%	100.0%
	% within MINORITY% IN TRACT	20.2%	28.3%	20.6%
	% of Total	19.3%	1.4%	20.6%
Total	Count	5553	279	5832
	% within Lien Status	95.2%	4.8%	100.0%
	% within MINORITY% IN TRACT	100.0%	100.0%	100.0%
	% of Total	95.2%	4.8%	100.0%

Loan originations accounted for 47.8% of all loans from 2008 to 2010. Another 12.5% were denied, 22.6% purchased and 9.4% were withdrawn by the applicant. Less than a majority of loans (29.6%) from 2008 to 2010 were not originated or sold. Fannie Mae, Ginnie Mae, and Freddie Mac account for 64.3% of purchasers of loans (see Table 25).

Table 24: Action Taken on Loan Applications

	Frequency	Percent	Valid Percent	Cumulative Percent
Loan originated	10222	47.8	47.8	47.8
Application approved but not accepted	1098	5.1	5.1	52.9
Application denied by financial institution	2666	12.5	12.5	65.4
Application withdrawn by applicant	2020	9.4	9.4	74.8
File closed for incompleteness	545	2.5	2.5	77.4
Loan purchased by the institution	4833	22.6	22.6	100.0
Preapproval request denied by financial institution	5	.0	.0	100.0
Total	21389	100.0	100.0	

Table 25: Loans by Purchaser Type

	Frequency	Percent	Valid Percent	Cumulative Percent
Fannie Mae (FNMA)	972	4.5	33.0	33.0
Ginnie Mae (GNMA)	264	1.2	9.0	42.0
Freddie Mac (FHLMC)	657	3.1	22.3	64.3
Private securitization	3	.0	.1	64.4
Commercial bank, savings bank or savings association	123	.6	4.2	68.6
Life insurance company, credit union, mortgage bank, or finance company	150	.7	5.1	73.7
Affiliate institution	368	1.7	12.5	86.2
Other type of purchaser	406	1.9	13.8	100.0
Subtotal	2943	13.8	100.0	
Missing - No Data Reported	18446	86.2		
Total	21389	100.0		

When denying a loan, the institution often reports to the HMDA as many as three reasons. From 2008 to 2010, the overall reason for denial of loans was lack of collateral (30.3%), debt-to-income ratio (23.4%), followed by incomplete credit application (11.1%), and credit history (5.0%).

Table 26: Overall Reasons for Denial

	Frequency	Valid Percent	Cumulative Percent
Debt-to-income ratio	164	23.4	23.4
Employment history	11	1.6	25.0
Credit history	35	5.0	30.0
Collateral	212	30.3	60.3
Insufficient cash (down-payment, closing costs)	25	3.6	63.9
Unverifiable information	52	7.4	71.3
Credit application incomplete	78	11.1	82.4
Mortgage insurance denied	4	0.6	83.0
Other	119	17.0	100.0
Subtotal	700	100.0	-----
Missing Data	20689	-----	-----
Total	21389	-----	-----

Protected classes and Loan Approvals and Denials

Some well-known economists have developed models for understanding discriminatory behavior that do not assume the lender (or the employer in the labor market situation) is prejudiced or foregoes profits. “Differentially adverse treatment of a protected group may instead result from ‘statistical’ discrimination; that is, discrimination that occurs because the lender finds it cheaper to use the characteristics of an applicant’s group, such as its race, to estimate the applicant’s creditworthiness rather than the applicant’s own past history”¹². “Another mechanism through which lenders might engage in statistical discrimination, referred to as the ‘thick file’ phenomenon, emerged from the investigation of Decatur Federal in Atlanta. It seemed that loan officers at that institution often provided more assistance to white than to minority lenders, so that the files of the white borrowers were likely to end up thicker than those of minority borrowers, and because of that assistance, may have been more likely to be approved”¹³.

Race and Ethnicity of Applicant and Co-Applicant

The next table displays the race of the applicant. The greatest percentage of loan applicants are Caucasians (88.9%) and [5.1%] African Americans. Over nine of ten co-applicants are Caucasians (91.0%) or African Americans (4.6%). The% of applications from African Americans decreased from 36.5% of all races in 2008 to 32.9% by 2010. However, during the same period, the% of loans applied for by Caucasians in The City of Roswell increased slightly as a% of all races (87.9% in 2008 to 88.9% in 2010).

¹² Ladd, Helen. 1998. Evidence on Discrimination in Mortgage Lending. *Journal of Economic Perspectives* 12:41-62.

¹³ Ibid.

Table 27: Racial Comparison of Loan Applicants, 2008-2010

	Frequency	Percent	Valid Percent	Cumulative Percent
American Indian or Alaska Native	49	0.2	0.3	0.3
Asian	876	4.1	5.4	5.7
Black or African American	835	3.9	5.1	10.8
Native Hawaiian or Other Pacific Islander	46	0.2	0.3	11.1
White	14495	67.8	88.9	100.0
Subtotal	16301	76.2	100.0	
Missing Data	5088	23.8		
Total	21389	100.0		

Table 28: Racial Comparison of Loan Co-Applicants, 2008-2010

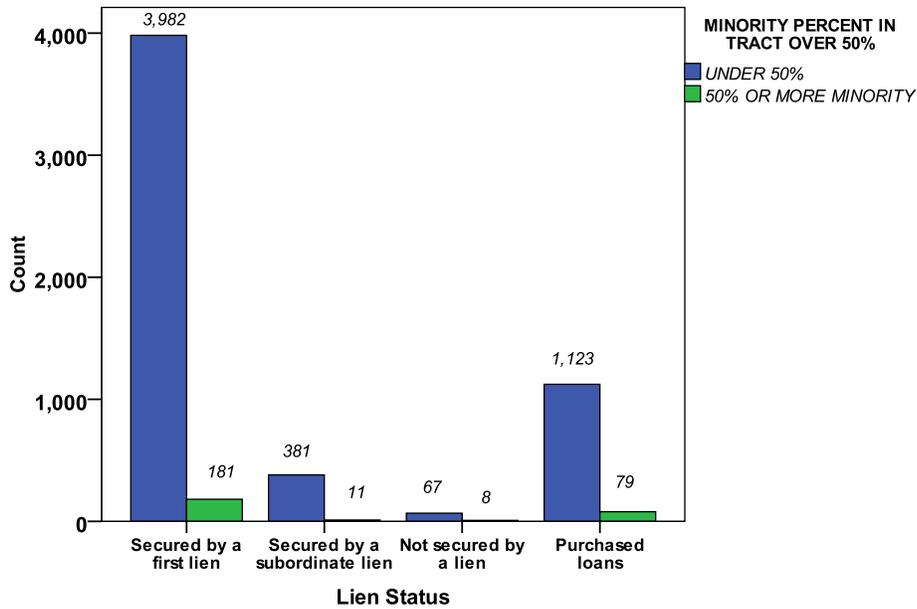
	Frequency	Percent	Valid Percent	Cumulative Percent
American Indian or Alaska Native	6	<0.1	0.3	0.3
Asian	74	0.3	3.9	4.2
Black or African American	87	0.4	4.6	8.8
Native Hawaiian or Other Pacific Islander	4	<0.1	0.2	9.0
White	1737	8.1	91.0	100.0
Subtotal	1908	8.9	100.0	
Missing Data	19481	91.1		
Total	21389	100.0		

Cross-tabulation analyses, in the Appendix, demonstrate that loans from census tracts with over 50% minorities have a higher probability of not being originated or sold ($X^2_{5, 0.05} = 45.8$; $p < 0.01$). The reasons for denial are reported for minorities in the Appendix. For African Americans, 34.5% were denied based on credit history, 22.4% because of insufficient collateral, and 15.5% based on debt-to-income ratios. This compares to 14.0% denials for credit history, 32.9% based on collateral, and 21.2% debt-to-income ratios for Whites in the City of Roswell. When controlling for credit history, more than twice as many African Americans as Whites were denied.

Applications are much more likely to be denied for incomplete credit applications for Whites, for both applicants and co-applicants, than for African Americans. This possibly leads to the “thick file” dilemma, mentioned by Ladd (1998), allowing these applicants to resubmit supplemental information.

Nearly three-fourths of all loans required a secured first lien. Minority census tracts loans were more likely to secure a first lien.

Table 29: Lien Status by Minority Census Tracts



An often-used method for analysis of loan decisions and their effect on protected classes is the approval rate, gap in approval rate and the denial rate ratio based on income and race. The following tables provide that analysis for HMDA data for 2008 to 2010 for applicants in The City of Roswell. There are statistically significant gaps in the approval rates by income and race between Caucasian and African American applicants. The denial rate ratio demonstrates that for every Caucasian denial, there are 1.62 denials for African American loan applicants.

**Table 30: Approval Rate for Home Purchase Mortgage Loans
Roswell, (2008-2010)**

	LOW INCOME	MODERATE INCOME	HIGH INCOME
Caucasian	69.5	79.7	82.6
African American	54.1	66.7	73.9

**Table 31: Gap in Approval Rate between African Americans and
Caucasians by HUD Income Category
Roswell, (2008-2010)**

LOW INCOME	MODERATE INCOME	UPPER INCOME
15.4*	13.0	8.7

*Note: 15.4 = 69.5 - 54.1 for low income in approval rate table above

Table 32: Denial Rate for Home Purchase Mortgage Loans

DENIAL RATE		DENIAL RATE RATIO*
CAUCASIAN	AFRICAN AMERICAN	
26.9	16.6	1.62

*Note: Denial rate is 26.9 ÷ 16.6

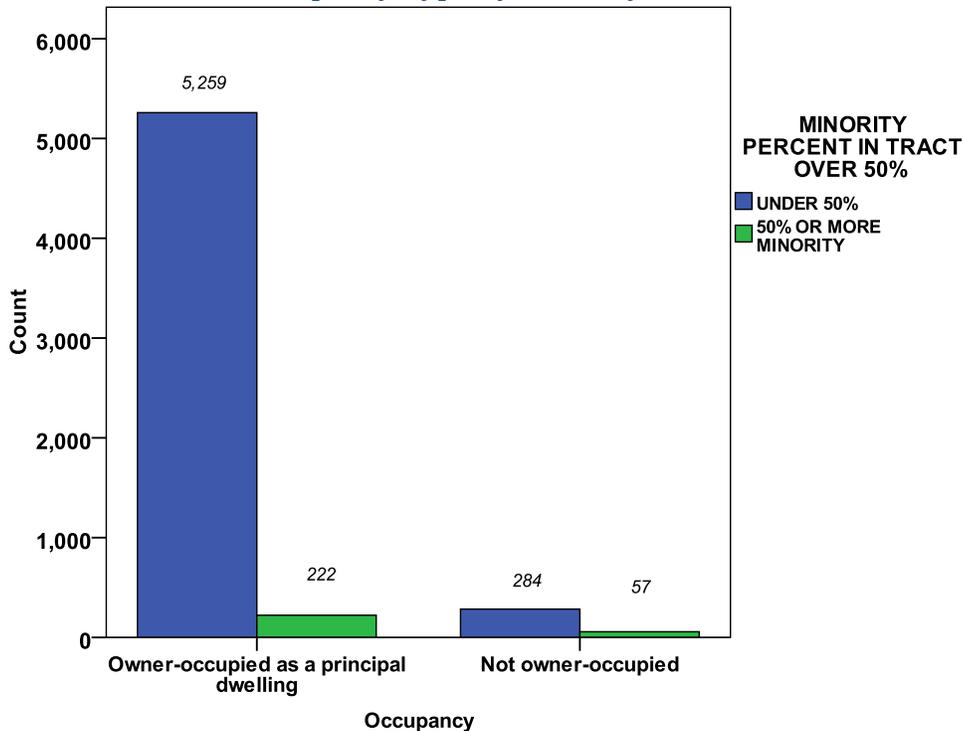
Sex of Applicant and Co-Applicant

Applicants for loans are overwhelmingly male (69.1%) and co-applicants are female (81.4%). When cross-tabulated by year, the% of male applications increased while the% of female applicants decreased. Males (57.6%) were slightly more likely to be denied for credit history problems than females (42.2%).

Tenure of Household

Nearly all (89.6%) loan applications were for owner-occupied principal dwellings. The figure below displays that those applications from within census tracts with low minority percentages were much more likely to be for owner-occupied dwellings ($X^2_{1, 0.05} = 112.9$; $p < 0.01$).

Table 33: Occupancy Type by Minority Census Tracts



Summary of Findings

The examination of HMDA data provides a beneficial illustration of mortgage activity. The HMDA statistics indicate that the overall experience of minority groups within the home mortgage loan market differs from that of Whites. Although HMDA data may suggest a lending bias in the home mortgage loan market, or other factors must be considered due to the data limitations alone is not sufficient to eliminate the effects of other factors beyond race, gender, and income in these trends. For example, economic factors (such as job availability) may play an important role influencing the higher denial rates for low or moderate income households. In addition, the structural conditions of the property and the ability to obtain homeowners insurances may also influence a loan approval decision. Consequently, HMDA data offers significant insight into potential problem areas that may require further investigation.

The analysis of the 2008, 2008 and 2010 HMDA data for the City of Roswell will assist local and regional leaders to identify credit needs that are not being met by lenders. Thus, the HMDA analysis will encourage local policymakers, community leaders, and financial institutions to collaborate on marketing to promote affordable lending products that reach protected classes. The City of Roswell can initiate a variety of monitoring activities that provide further detailed information about the results of policies, practices, and procedures used in the housing industry. These activities may range from reviewing and analyzing data available to the general public, such as HMDA data, to conducting

carefully designed systematic fair housing audits to determine the extent of discriminatory practices [if any] in a particular segment of the housing market.

10 Fair Housing Complaints

HUD's 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 initiated.

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.

The national study "*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. In addition, HUD's study found that 14% of the adult population claims to have experienced some form of housing discrimination at one point or another in their lives. Of those who thought they had been discriminated against, 83% indicated they had done nothing about it, while 17% say they did pursue a complaint. In HUD's follow-up study *Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law* (published in 2006) 41% of the former survey respondents said it was "very likely" they would do something about future discrimination compared to only 20% in the initial survey."¹⁴ The survey revealed that 46% of those who reported having experienced discrimination in the past and done nothing about it said they would very likely do something about future discrimination.

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 in order to better equip persons with the ability to assist in reducing impediments.

According to the National Fair Housing Alliance (NFHA) 2012 Fair Housing Trends Report¹⁵, more disability complaints have been filed than any other type of fair housing complaints. NFHA suggests that this may be attributed to apartment owners' direct refusal to make reasonable accommodations or modifications for people with disabilities. As a result, HUD has implemented the Fair Housing Accessibility FIRST program to assist in educating architects and builders regarding design and construction of accessible housing units.

Complaints Filed With HUD

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

¹⁴ 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>

¹⁵ HUD Policy Research & Development *Do We Know More Now? Trends In Public Knowledge, Support And Use Of Fair Housing Law*. <http://www.huduser.org/Publications/pdf/FairHousingSurveyReport.pdf>

hate violence. The following table identifies the number of complaints filed by location at which the alleged discrimination occurred, the status of the complaint, and the basis for the complaint.

From January 1, 2001 and August 31, 2012 there were 24 housing complaints filed in Roswell. Of these complaints, seven were determined to have cause and four of the complaints were settled through conciliation with one complaint being awarding a total settlement amount of \$10,000. Only one of the “with cause” complaints was withdrawn after resolution. As of August 31, 2012, all 24 FHEO complaints have been closed. The complaints as presented from the FHEO are found in full in the Appendix.

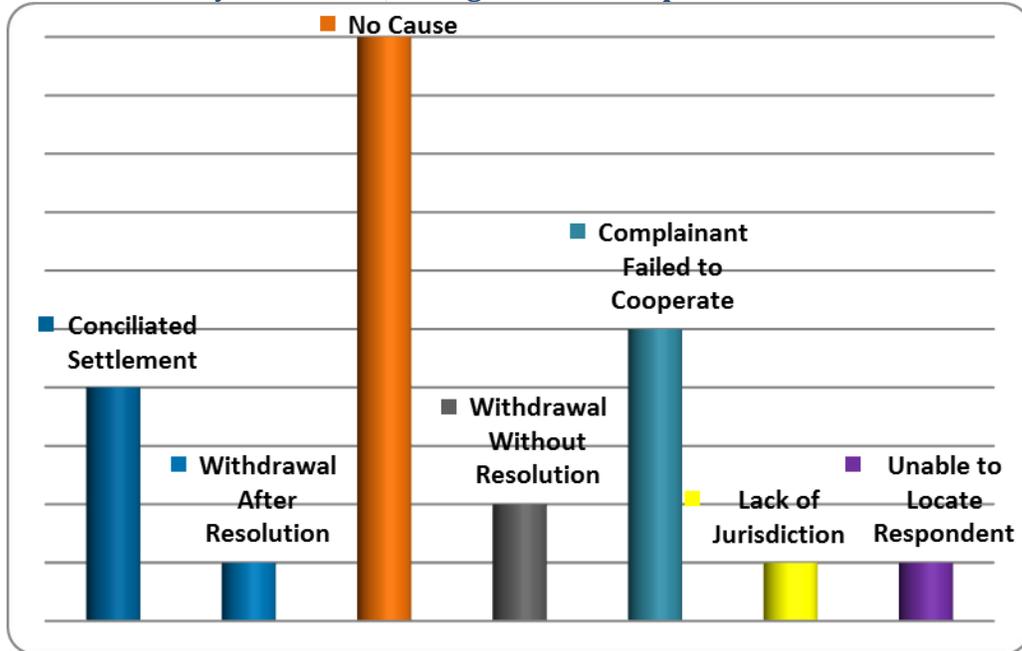
Table 34: Complaints of Housing Discrimination Received in Roswell, Georgia
City of Roswell, Georgia

Number Filed	Number Closed	Number Open	With Cause	Settlement Awarded	Total Settlement Awarded
24	24	0	7	4	\$10,000
Characteristics of Complaints Filed					
Disability		8	Age		0
Color/Race		6	Citizenship		0
Familial Status		4	Religion		4
Marital Status		0	Retaliation		0
Sex		4	Harassment		0
National Origin		7	Other/Criminal Status		0

Source: U.S. Housing & Urban Development Office of Fair Housing and Equal Opportunity

This review of complaints shows that the overwhelming majority of complaints filed and investigated [33] by the Atlanta FHEO for the City of Roswell was based on disability and national origin status, respectively at 24% and 21% of the total types of Protected Class complaint filings with color/race and familial status, sex, and religion as the next largest complaints at 18% and 6%. A lack of filed complaints does not indicate that a problem does not exist. It should be noted that these complaint numbers may exceed the total number of filings, due to multiple discrimination allegations within a single complaint.

Table 35: City of Roswell, Georgia FHEO Complaints Closure Reasons



Source: U.S. Housing & Urban Development Office of Fair Housing and Equal Opportunity

Summary of Findings

An examination of fair housing complaints for jurisdictions can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. However, it is important to note that reviewing the number of fair housing complaints filed within a given community cannot by itself be used as a direct indicator of fair housing problems in that community. As noted in the FHEO Summary of Complaints for Roswell, the largest numbers of complaints filed were alleged claims of discrimination based on disability status and national origin.

A lack of complaints filed with no cause determination is also not indicative of the number of fair housing discrimination in a community. Many households do not file complaints because they are uneducated about the process of filing a complaint. However, there are households that are aware that they are experiencing housing discrimination, but they are simply not aware that this discrimination is against the law. Finally, most households are more interested in achieving their first priority of finding decent affordable housing and prefer to avoid going through the process of filing a complaint and following up to ensure the case is resolved.

In conducting this fair housing complaint analysis, several data limitations should be noted again that the fair housing complaints filed in the City of Roswell represents the location in which the discrimination occurred and may include complaints filed from residents of surrounding jurisdictions.

11 Fair Housing Education

Fair housing education is a critical aspect in reducing fair housing violations and provides citizens knowledge of their rights and of their options when they feel their rights have been violated. A logical assumption can be made that the more complaints that are filed, the more likely people are aware of their rights and what is covered in the Fair Housing Act. The baseline measurement regarding public awareness of fair housing issues comes from a national survey conducted in 2000 by the HUD. The survey revealed that “majorities of the adult public were knowledgeable about and approved of most aspects of the law¹⁶. However, 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 increase of national 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.

Public awareness of fair housing issues and laws ensures that citizens know their rights and what to do if their rights have been violated. 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. Services can also include providing landlord/tenant counseling that educates landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation as well as mediating disputes between tenants and landlords.

This Analysis of Impediments is the first analysis that the City will be conducting solely for the City of Roswell. In recent years, Roswell has been included the analysis for the Fulton County. Given the size of Fulton County

The City of Roswell does not have any organization solely dedicated to providing fair housing education to residents of the City; there are organizations that receive complaints if a citizen feels they have been discriminated against. The US Department of HUD Region IV Office of Fair Housing and Equal Opportunity (FHEO) receive complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Georgia, Florida, Alabama, Mississippi, Tennessee, Kentucky, North Carolina, and South Carolina. In 2012, FHEO conducted a Fair Housing Symposium in the City of Roswell to provide education of Fair Housing laws to service providers, housing providers, and jurisdiction representatives. This event was one of the first Fair Housing initiatives since the City of Roswell has managed its own entitlement funds.

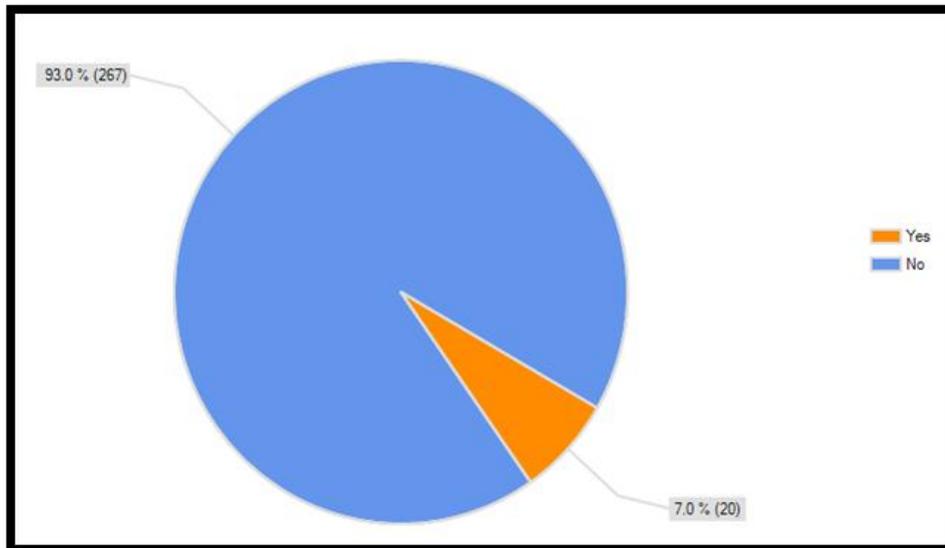
Metro Fair Housing Services is a nonprofit fair housing advocacy and enforcement organization that provides fair housing education and outreach services and investigates housing discrimination in the Metropolitan Atlanta area and throughout the state of Georgia. Metro Fair Housing Services receives complaints from residents of the City of Roswell, and provides education or outreach as requested by the City.

Based on the responses derived from the Fair Housing Survey conducted in conjunction with this Analysis, many residents in the City expressed a need for improvement on fair housing education efforts directly to the housing industry and to the general public. A brief summary of the survey responses are as follows:

¹⁶ 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>

When asked if any of the survey respondents had ever experienced housing discrimination, 247 out of 267 [93.0%] of survey respondents stated they had never experienced housing discrimination. While 20 [7.0%] of respondents reported that they had experienced housing discrimination.

Residents who have Experienced Discrimination in the City of Roswell



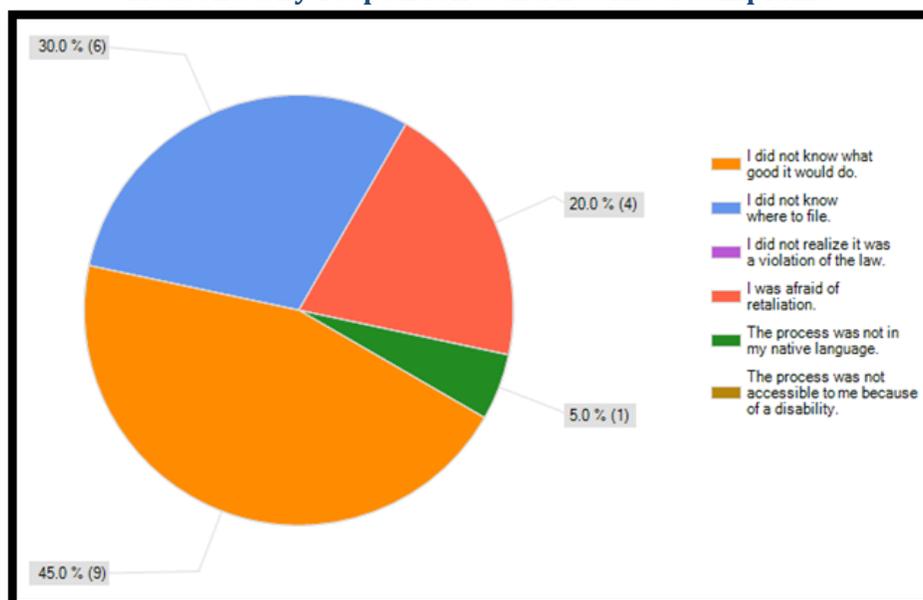
Source: City of Roswell Fair Housing Survey

http://www.surveymonkey.com/MySurvey_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2IDlfo3FoNsbA77w%3d

The respondents that had experienced discrimination were asked a follow-up question to ascertain the source of discrimination. None of the 20 survey respondents who reported that they had been discriminated against actually filed a complaint.

When asked the reason respondents did not file a fair housing complaint, 9 of the 20 [45%] survey respondents responded that stated that they did not know what good it would do; while 6 [30%] of survey respondents responded that they did not know where to file; 4[20%] feared retaliation and only 1 person responded that the process was not in their native languages.

Reasons why respondents did not file a complaint

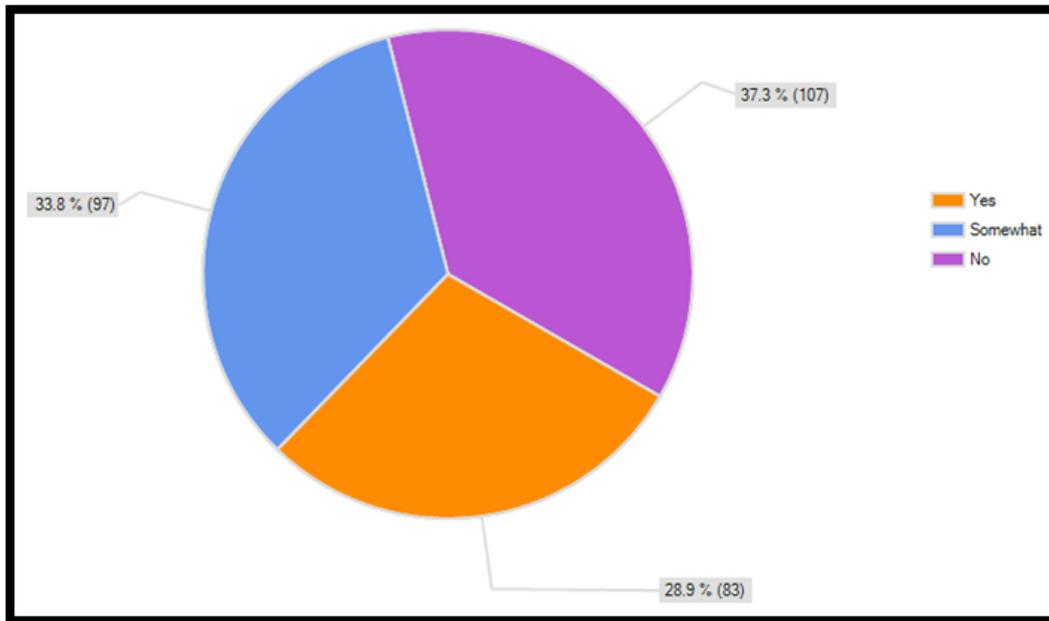


Source: City of Roswell Fair Housing Survey

<http://www.surveymonkey.com/MySurveyResponses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2IDlfo3FoNsbA77w%3d>

When asked if survey respondents were knowledgeable about their fair housing rights, 180 out of the 287 survey respondents [62.7%] stated they were either familiar or somewhat familiar with fair housing rights. While 107 of the 287 survey respondents [37.3%] stated they did not know their fair housing rights.

Knowledge of Fair Housing Rights



Source: City of Roswell Fair Housing Survey

<http://www.surveymonkey.com/MySurvey/Responses.aspx?sm=H5OhK1YklypH4TGnSERF05T4ZL2IDIfvo3FoNsbA77w%3d>

While HUD has not determined a national standard for the adequate level of public awareness; HUD encourages jurisdictions to make a continual effort to increase public awareness of fair housing laws. HUD's FHEO encourages jurisdictions to implement education and outreach activities in an effort to reduce potential violations of fair housing laws. Knowing about the laws and their penalties can serve as a deterrent and help protect against discrimination complaint charges being filed in the City of Roswell.

12 Affordable Housing Snapshot

Housing affordability is a significant factor for residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30% of a family's income¹⁷. Households that spend over that threshold tend to lack affordable housing and may be significantly cost burdened and may have difficulty affording basic necessities.

Yet, according to HUD, 12 million renters and homeowners in the United States 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.¹⁸ 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 the metropolitan and other areas. The data is categorized based on its relationship to the median family income. The categories include: extremely low income (earning less than 30% of the MFI), very low-income (earning between 30% and 50% of the MFI), low-income (earning between 50% and 80% of the MFI). According to HUD, the 2012 Median Family Income (MFI) for households in the City of Roswell is \$69,300.

Table 36: FY 2012 Income Limits Summary for City of Roswell, Georgia

FY 2012 Income Limits Summary – City of Roswell, Georgia										
FY 2012 Income Limit Area	Median Income	FY 2012 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Roswell, Georgia	\$69,300	Very Low (50%) Income Limits	\$24,300	\$27,750	\$31,200	\$34,650	\$37,450	\$40,200	\$43,000	\$45,750
		Extremely Low (30%) Income Limits	\$14,600	\$16,650	\$18,750	\$20,800	\$22,500	\$24,150	\$25,800	\$27,500
		Low (80%) Income Limits	\$38,850	\$44,400	\$49,950	\$55,450	\$59,900	\$64,350	\$68,800	\$73,200

*Note: The City of Roswell is part of is part of the Atlanta-Sandy Springs-Marietta, GA HUD Atlanta Metro FMR Area Information presented here applies to all of the Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area

Source: FY 2012 Income Limits Summary Source: Department of Housing & Urban Development, HUD User Dataset, Income Limits, www.huduser.org.

A community's housing needs change over time as the size and 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. The size and type of homes are also influenced by family size, householder age, and economic status.

While housing choices can be fundamentally limited by household income and purchasing power, the lack of affordable housing can be a significant hardship for low-income households preventing them from meeting their other basic needs. The following section of this Analysis will present a housing snapshot for the City of Roswell, Georgia.

¹⁷ U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/index.cfm>

¹⁸ U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/>

Housing

As of the 2010 Census, the City of Roswell had a total of 36,344 housing units, of which 2,399 [6.6%] were vacant, a significant increase from 2000. As indicated by the 2000 Census figures, the City of Roswell only had 31,300 housing units, of which 1,093 [3.5%] were vacant.

Table 37: City of Roswell Housing Unit Analysis

	2000	2010
Total Housing Units	31,300	36,344
Occupied	30,207	33,945
Vacant	1,093	2,399
Vacancy Rate	3.5%	6.6%

Source: U.S. Census Bureau, American Community Survey Decennial & 1-Year Estimates

According to the 2011 ACS estimates, Roswell had a total of 35,787 housing units, of which 2,264 [6.3%] were vacant. Of the total housing units, 35,787 [68.8%] were single-family attached or detached units, while 11,061 [38.5%] were multi-family units and 104 [.3%] were mobile homes*. Multi-family housing, whether it's a small 5-unit multi-family building or a large 20 or more units apartment building, makes up the second largest housing type in Roswell. Many of these tend to be rental units.

Table 38: Housing Unit Analysis for the City of Roswell

City of Roswell Housing Unit Analysis		
Units in Structure	City of Roswell	Percent
<i>Total housing units</i>	35,787	100%
1-unit, detached	21,896	61.2%
1-unit, attached	2,726	7.6%
2 units	67	0.2%
3 or 4 units	1,301	3.6%
5 to 9 units	1,785	5.0 %
10 to 19 units	5,019	14%
20 or more units	2,889	8.1%
Mobile Homes*	104	0.3%
Boat, RV, van, etc.	0	0.0%

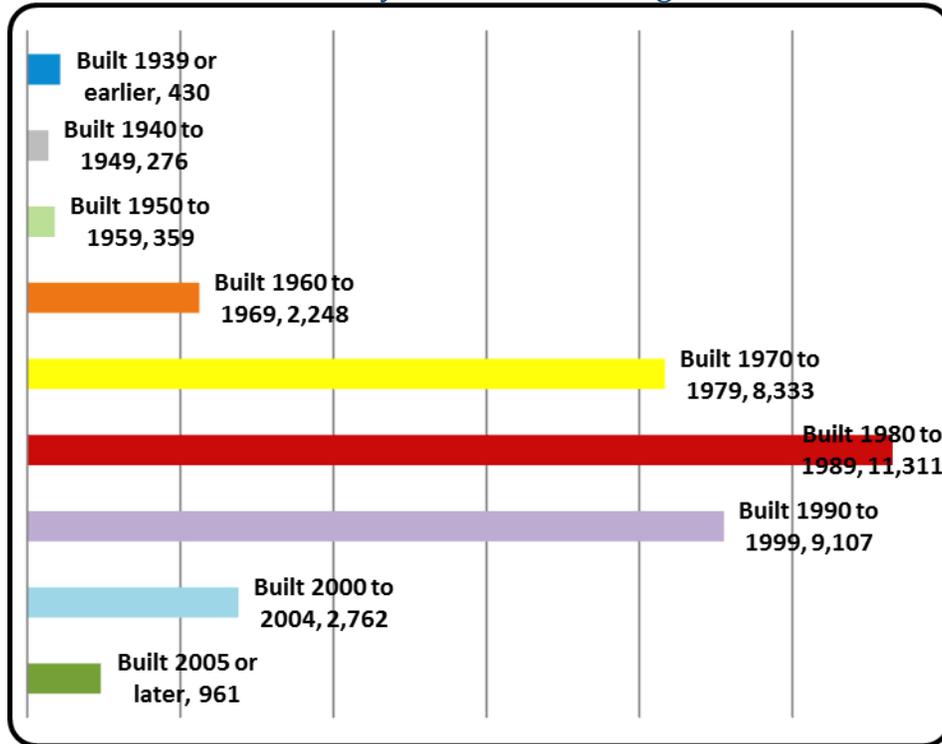
Table 39: City of Roswell Housing Unit Analysis
Source: U.S. Census Bureau, 2011 ACS 1-Year Estimates

*This data uses census tracts which include an area outside of the City limits. The City does not have any mobile homes.

Housing Conditions

The age of the housing stock in Roswell has a significant impact on the housing conditions in the area. A significant portion of the housing stock in Roswell has aged, with nearly 64.2% of the housing units built before 1980. As housing ages, maintenance costs also rise which can present significant cost issues for low and moderate homeowners.

Table 40: City of Roswell Housing Stock



Source: U.S. Census Bureau, 2011 American Community Survey

According to the 2011 ACS, the median value for a home in the City of Roswell was \$274,300 with 8,597 [39%] of homes ranging in value between \$200,000 and \$299,999. The second most common range of home values was \$300,000 to \$499,999, comprising 33% of all owner-occupied units. Approximately 17,392 [78.9%] of all homes within the City were valued at over \$200,000.

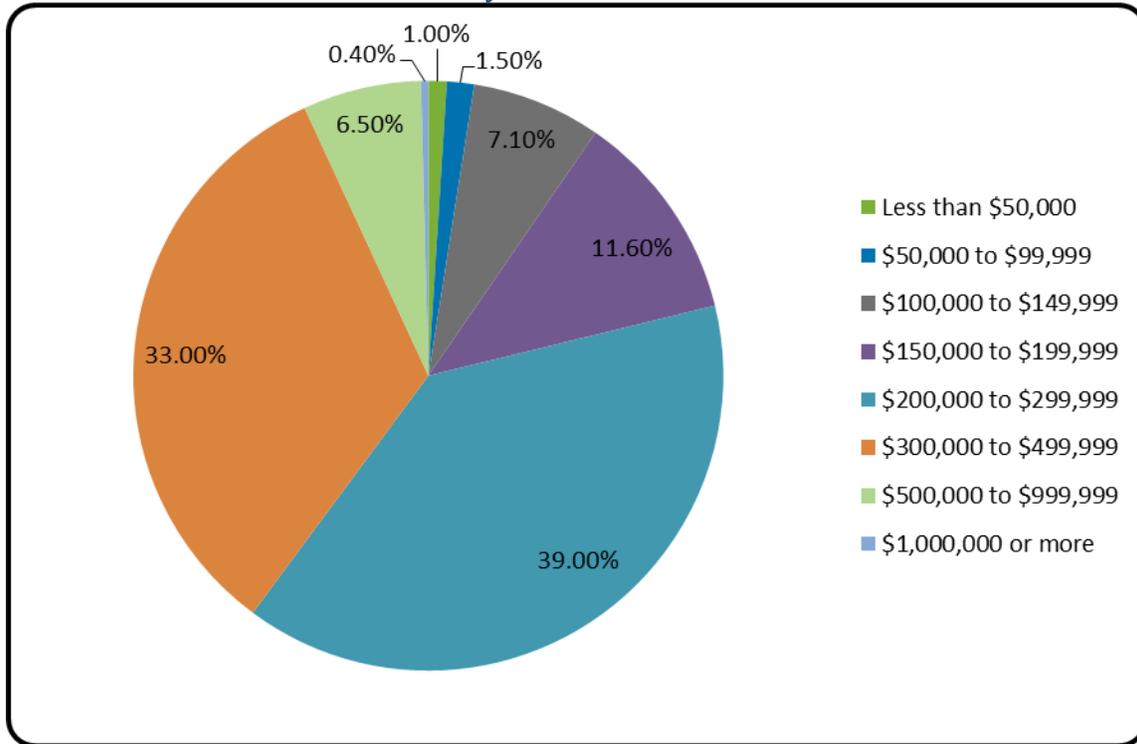
Table 41: City of Roswell Home Values

<i>Roswell Home Values</i>		
Total Owner-Occupied Units	22,036	100%
Less than \$50,000	213	1.0%
\$50,000 to \$99,999	324	1.5%
\$100,000 to \$149,999	1,561	7.1%
\$150,000 to \$199,999	2,546	11.6%
\$200,000 to \$299,999	8,597	39.0%
\$300,000 to \$499,999	7,281	33.0%
\$500,000 to \$999,999	1,430	6.5%
\$1,000,000 or more	84	0.4%

City of Roswell Home Values

Source: U.S. Census Bureau, 2011 American Community Survey

Table 42: City of Roswell Home Values



City of Roswell Home Values.
Source: U.S. Census Bureau, 2011 American Community Survey

A five year comparison of the median value of homes in the City of Roswell reflects a continuing decline in home prices in the area. In 2007, the median sales price of homes in Roswell was \$319,000. In 2010, the median value of homes in Roswell had decreased to \$304,100. According to the 2011 ACS estimates, the median value of homes in Roswell had declined by \$29,800.

Table 43: Roswell Median Home Value Comparison by Year

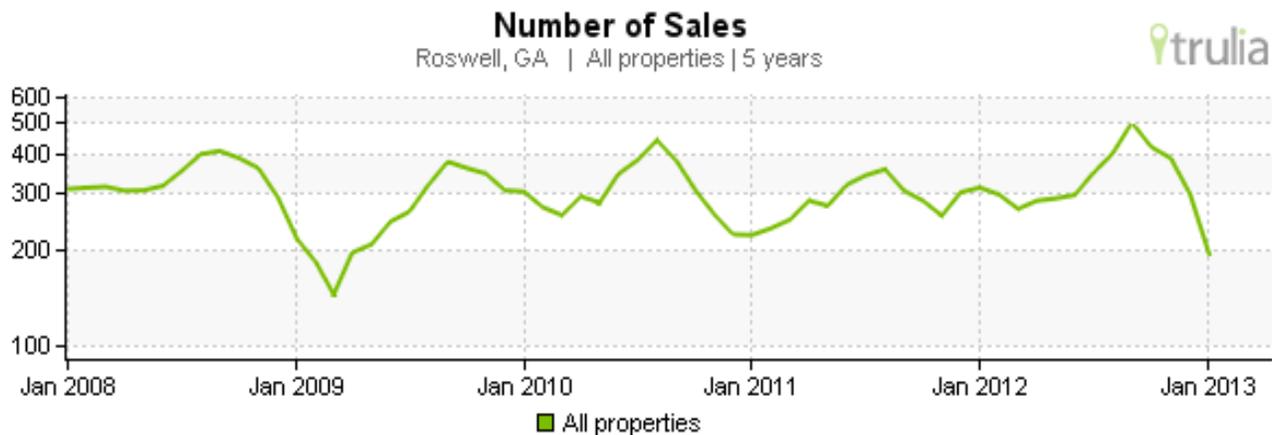
	2007	2008	2009	2010	2011
Median Home Values	\$319,000	\$322,800	\$311,600	\$304,100	\$274,300

City of Roswell Home Values
Source: U.S. Census Bureau, 2011 American Community Survey

While the median home values have continued to decline in the last five years, the City has experienced significant decreases in the number of homes sold in the City. According to Trulia, the median sales price for homes in Roswell for the last quarter of 2012 was \$228,750. This represents a decline of 12.9%, or \$33,750, compared to the prior quarter and a decrease of 0.5% compared to the prior year. Sales prices have depreciated 14.6% over the last 5 years in Roswell¹⁹.

¹⁹ Trulia.com, http://www.trulia.com/real_estate/Roswell-Georgia/market-trends/

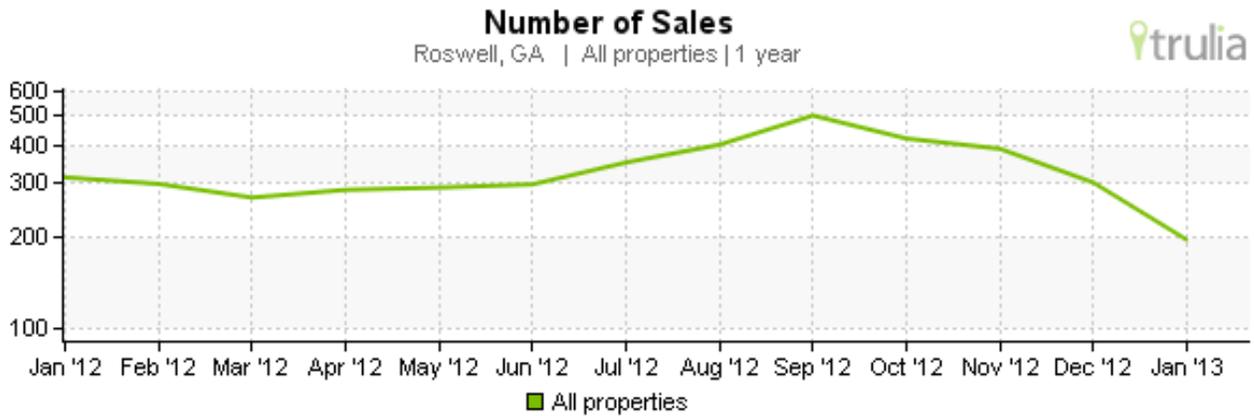
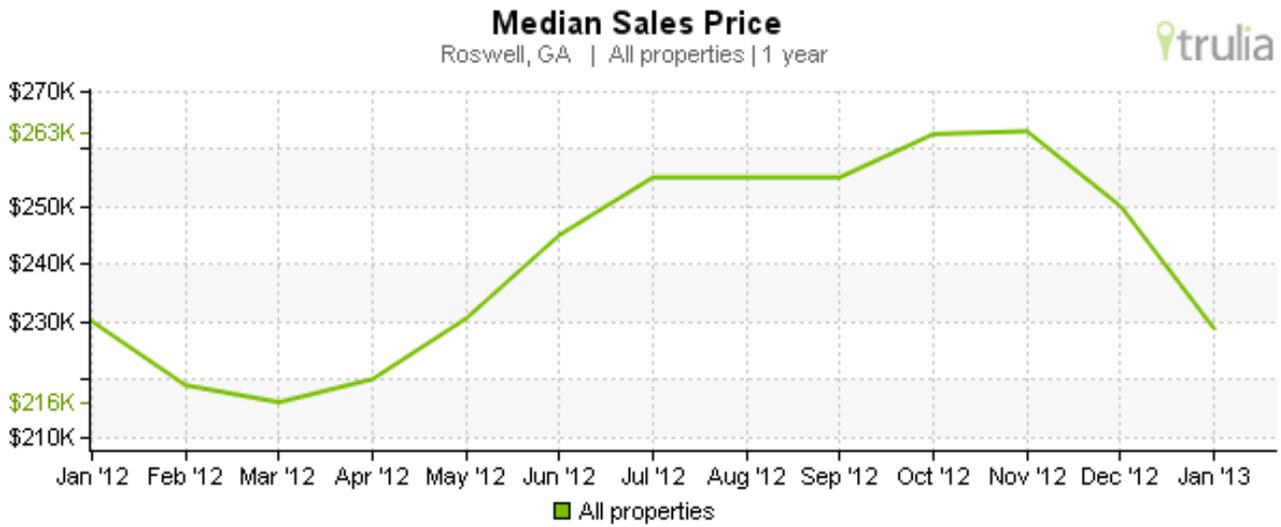
Table 44: City of Roswell Median Sales Price & Number of Sales Comparison 2007-2012



Source: Trulia.com, www.trulia.com

In 2012, the median sales price for homes in Roswell had increased to \$263,000 in November, however by the end of the year the median sales price had declined to \$230,000, which is a 12.5% decrease. According to Trulia, in September 2012 the number of home sold in Roswell was at an annual high of 500 sales and by December 2012 the number of sales had decreased to only 200 homes sold.

Table 45: City of Roswell 2012 Median Sales Price & Number of Sales



City of Roswell 2012 Median Sales Price & Number of Sales
Source: Trulia.com, www.trulia.com

Household Income Costs

As indicated in the Affordability Snapshot table, Roswell has a significant percentage of homeowners spending more than 30% of their annual household income on housing-related costs. According to the 2011 ACS, 34.2% of homeowners with a mortgage pay more than 30% of their income on monthly housing costs. Conversely, 56.9% of renters spent more than 30% of their income on rent.

**Table 46: Affordability Snapshot for Roswell,
City of Roswell, Affordability Snapshot**

Value	Estimate	Percent
Total housing units	35,787	-
Median (dollars)	274,300	-
MORTGAGE STATUS		
Owner-occupied units	22,036	61.6%
Homeowner vacancy rate	-	2.8%
Selected Monthly Owner Costs as a Percentage of Household Income (SMOCAPI)		
Housing units with a mortgage	17,687	-
Less than 20.0 percent	7,669	43.4%
20.0 to 24.9 percent	2,628	14.9%
25.0 to 29.9 percent	1,343	7.6%
30.0 to 34.9 percent	917	5.2%
35.0% or more	5,130	29%
Housing unit without a mortgage	3,942	-
Less than 10.0 percent	1,990	50.5%
10.0 to 14.9 percent	891	22.6%
15.0 to 19.9 percent	641	16.3%
20.0 to 24.9 percent	196	5%
25.0 to 29.9 percent	224	5.7%
30.0 to 34.9 percent	0	0.0%
35.0% or more	0	0.0%
RENTAL HOUSING STATUS		
Renter-occupied	11,487	32.1%
Rental vacancy rate	-	8.8%
GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME (GRAPI)		
Occupied units paying rent (excluding units where GRAPI cannot be computed)	10,962	-
Gross Rent	\$929	-
Less than 15.0 percent	674	6.1%
15.0 to 19.9 percent	1,777	16.2%
20.0 to 24.9 percent	990	9%
25.0 to 29.9 percent	1,279	11.7%
30.0 to 34.9 percent	953	8.7%
35.0% or more	5,289	48.2%

City of Roswell Affordability Snapshot
Source: U.S. Census Bureau, 2011 American Community Survey

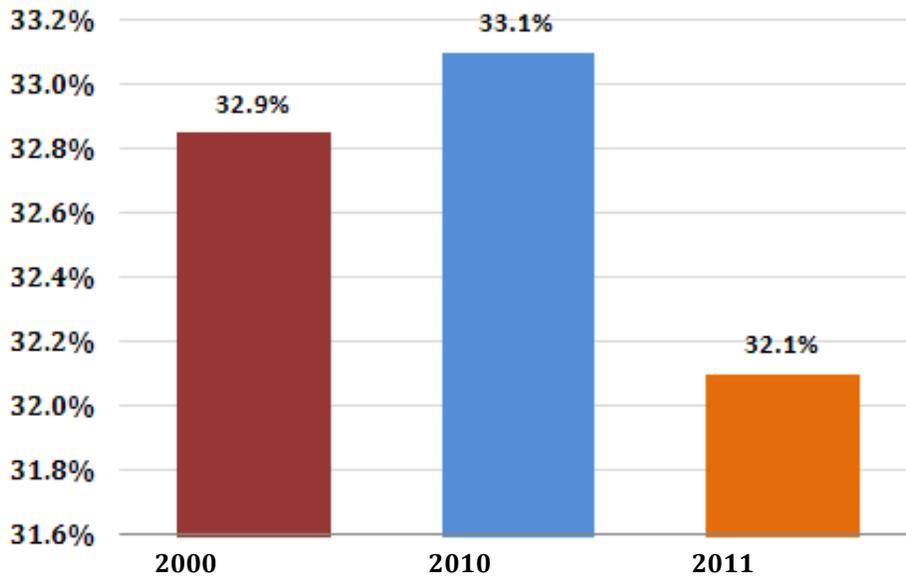
Rental Housing Affordability

The U.S. Census tabulates housing payments for renter occupied housing units by household income range, providing an estimate of the number of households with excessive cost burdens. Affordable rent is generally categorized as 30% of total monthly income. The estimated number of all renters who were cost burdened during 2006-2010 was 4,829 [48.5%]²⁰. As the City of Roswell's Affordability Snapshot illustrates, in 2011 about 6,242 [56.9%] of renter households pay 30% or more of their income on rent, which reflects a 17.3% increase of renter cost burdens. According to

²⁰ Source Policy Map, www.policymap.com

the 2011 American Community Survey, it is estimated that 32.1% or 11,487 households rented their homes which is a slight increase of 0.2% since 2010.

Table 30: Rental Occupancy Rate for Roswell, 2000-2011



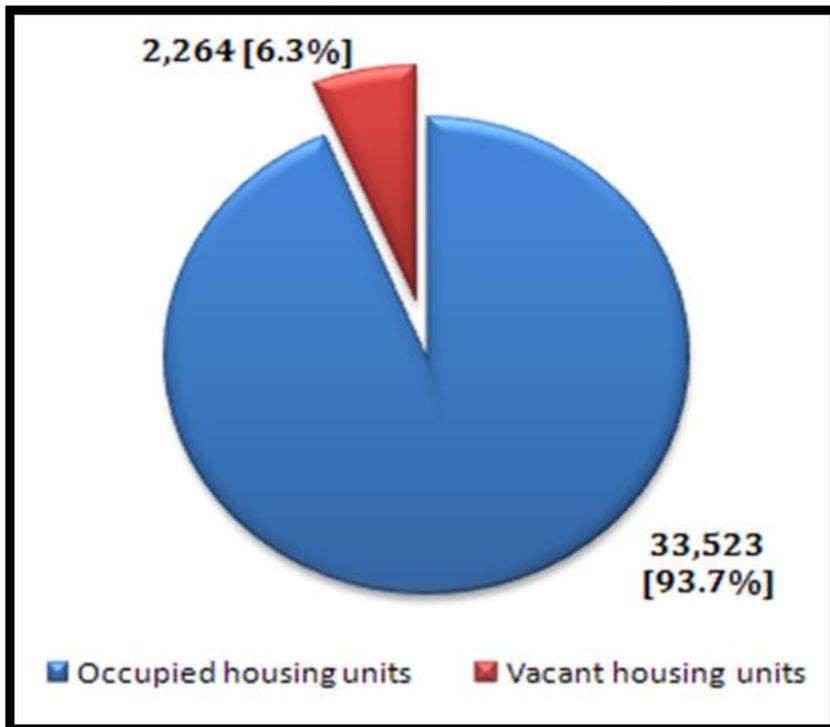
City of Roswell Rental Occupancy Rate

Source: U.S. Census Bureau, 2000, 2010, Census & 2011 American Community Survey

Vacancy

According to the 2011 ACS, the overall vacancy rate for renter and owner housing units in the City of Roswell was 6.3%. By comparison, the 2010 Census indicated 6.6% of housing units were vacant. Low vacancy rates are reflective of high demand, which will continue to add pressure to increase rents. Low vacancy rates could also indicate prospective renters, particularly low-income renters, may have a difficult time finding suitable and affordable housing in the City of Roswell.

Table 47: Roswell Occupied and Vacant Housing



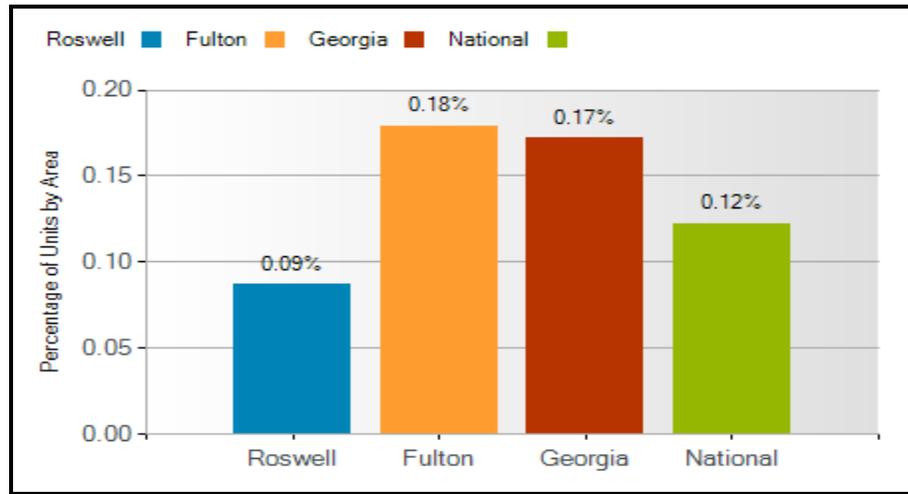
City of Roswell Occupied and Vacant Housing

Source: U.S. Census Bureau, 2011 American Community Survey, www.census.gov

Foreclosure Data

The national housing market has experienced a severe downturn due in part to lending disruptions and high unemployment rates. Additionally, foreclosure rates have also increased due to the high quantity of sub-prime mortgages and adjustable-rate mortgages that were issued during the housing boom. Based on Realty Trac’s geographical foreclosure comparison, the City of Roswell has significantly lower percentage of foreclosure units than the state average and national average.

Table 48: Roswell Foreclosure Comparison

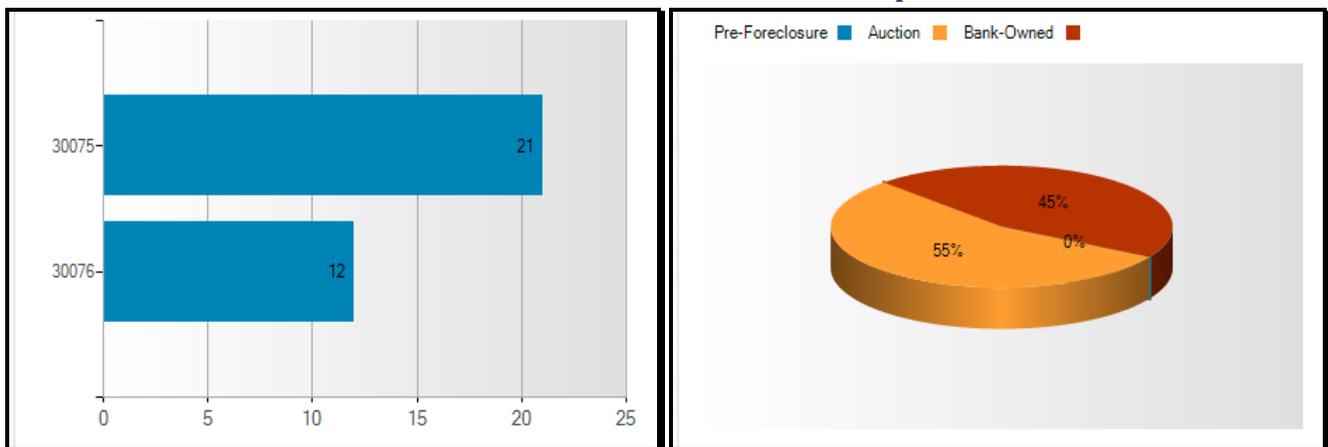


Roswell Foreclosure Comparison

Source: Realty Trac, December 2012 Real Estate Trends, www.realtytrac.com

The 2011 ACS estimated that the City of Roswell had 35,787 owner-occupied housing units, 296 of which were in foreclosure according to Realty Trac’s December 2012 foreclosure data. The average foreclosure sales price in the City of Roswell as of November 2012 was \$236,155²¹. Realty Trac’s foreclosure activity count as of December 2012 reflects 33 new foreclosures on the market in the City, of which 45 of the foreclosures in Roswell were bank-owned.

Table 49: Roswell Foreclosure Rate Comparison



City of Roswell Foreclosure Rate Comparison Source: Realty Trac, December 2012 Real Estate Trends, www.realtytrac.com

²¹ Realty Trac, November 2012 Real Estate Trends, www.realtytrac.com

Public Housing

The subsidized Housing Choice Voucher rental assistance program enables a jurisdiction to provide affordable housing options for very low-income households. A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the property owner agrees to participate in the program. Rental units are required to meet HUD minimum housing standards, as determined by the public housing agency (PHA). In many cases the housing subsidy is paid directly to the landlord by the PHA on behalf of the participating family. The family will then pay the difference between the actual rent charged by the landlord and the amount subsidized by the program each month. Under certain circumstances, if authorized by the PHA, a family may use its voucher to purchase a modest home. Since the demand for housing assistance often exceeds the limited resources of local housing authorities, long waiting lists are common.

The Housing Authority of the City of Roswell also known as the Roswell Housing Authority (RHA) assists in providing affordable and market rate rental housing units throughout the City. While the RHA does not administer the Housing Choice Voucher Program, it has been instrumental in creating over 2,300 new affordable rental units in Roswell. The RHA operates 103 units of public housing which is currently located on Oak, Myrtle, and Grove Street within the city limits of Roswell. Of the 103 units, 61 are specifically designated for elderly and persons with disabilities with the remaining units designated for family housing. According to HUD's 2009 Picture of Subsidized Households, the City of Roswell had a total of 89 low income persons who were served through public housing unit program.

Table 50: City of Roswell Public Housing Inventory

City of Roswell Public Housing Inventory	
Total Units	103
% Occupied	62%
% Disabled	32%
% Minority	43%
% Black	37%
% Hispanic	4%
Total Persons Housed	89
Months from Move-In	126

City of Roswell Public Housing Inventory

Source: Picture of Subsidized Households for 2009 <http://www.huduser.org/portal/picture/picture2009.html>

According to HUD's Low Income Housing Tax Credit (LIHTC) database, the City of Roswell has only one affordable housing development funded by Low Income Housing Tax Credits which provides 508 affordable housing units, as shown in the following table.

Table 51: City of Roswell Low Income Tax Credit Projects

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
GAA0000315	PARK RIDGE APARTMENTS	1000 HOLCOMB BRIDGE RD	ROSWELL	GA	30076	508	508
TOTAL UNITS						1508	1508

City of Roswell LIHTC

Source: HUD Low-Income Housing Tax Credit Database, <http://lihtc.huduser.org/>

However, the *National Housing Preservation Database* which provides all available data on federally subsidized housing properties from several different funding streams reflect the City of Roswell has a total of 33 HUD project based rental assistance properties. The database provide information on contract expiration dates, loan maturity dates, number of units, type of owner, and other property

and subsidy characteristics are included to assist users in determining whether or not a property is at risk of leaving the subsidized housing stock.

Table 52: City of Roswell HUD

Property Name	Property Address	City, State, Zip	Total Active Subsidies	Earliest Expiration Date	Latest Expiration Date	Total Units	Manager	Owner	NHPD ID
North Fulton County Group Home	1200 Ellis Rd Suite A	Roswell, 30076	2	3/17/2012	5/1/2012	12	Southern Rehabilitation Consultants	North Fulton County Group Home Assc. INC	22477
North Metro Group Homes Assn INC.	805 E. Hembree Crossing	Roswell, 30076	2	2/1/2031	4/22/2013	6	Enable of Georgia, INC.	North Metro Group Homes Assn. INC	22549
South Metro Homes, INC	1200 Ellis Rd	Roswell, 30076	1	11/30/2016	11/30/2016	15	Enable of Georgia, INC.	South Metro Homes, INC.	22538
TOTAL UNITS						33			

City of Roswell HUD Project Based Rental Assistance

Source: National Housing Preservation Database, <http://www.preservationdatabase.org/>

Persons with Disabilities & Elderly

HUD's Inventory Survey of Units for the Elderly and Disabled lists several multi-family housing units that serve the elderly population and persons with disabilities. These units tend to offer rental assistance or other housing subsidy programs. The properties in the following table have a combined 15 assisted units in service in which all of the assisted units are designated specifically for disabled persons.

Table 53: Multifamily Housing Inventory of Survey of Units for the Elderly and Disabled Persons – City of Roswell,

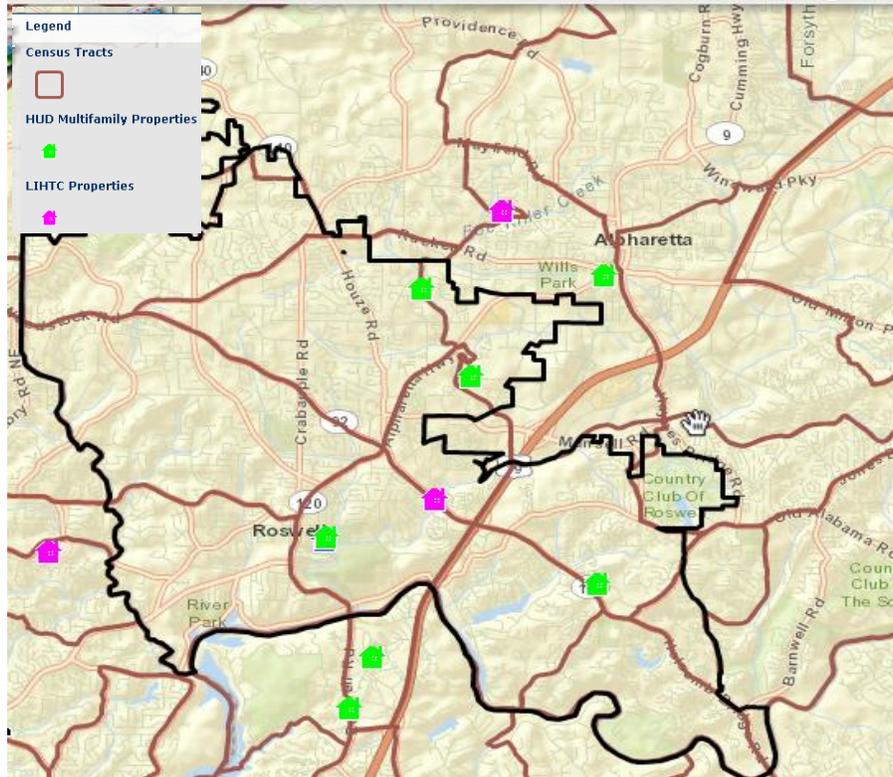
Property Name	Address	Occupancy Eligibility	Total Units	Total Assisted Units	Total Units Designated for Elderly	Total Units Designated for the Disabled	Total Units with Accessible Features	Available Bedroom Sizes	Survey Date
North Metro Group Homes Assn INC	805 E Hembree Crossing Roswell,	Disabled	5	5	0	5	5	1-BR	Oct. 2009
North Fulton County Group Home	1200 Old Ellis Rd Suite A Roswell,	Disabled	10	10	0	10	4	1-BR	Jan 2009
TOTALS			15	15	0	15	9		

HUD's MFH Inventory Survey of Units for the Elderly and Disabled.

Source: <http://www.hud.gov/offices/hsg/mfh/hsgrent.cfm>

The map on the following page displays the distribution of HUD multifamily properties and LIHTC properties within the City of Roswell.

Table 54: City of Roswell Concentration of HUD Assisted Properties



City of Roswell Concentration of HUD Assisted Housing Properties Source: HUD eCon Planning Suite, <http://egis.hud.gov/cpdmaps>

Summary of findings

The affordability of housing can increase barriers to fair housing choice and exacerbate housing patterns for households of similar incomes. Increased housing related expenses can place significant cost burdens on residents which may impact their ability to obtain affordable housing as cost tends to restrict housing choice, particularly for those with lower incomes. The availability of new and existing affordable housing units has been an increasing challenge in the City of Roswell, both in rental and home ownership.

Affordable housing, in general, is a concern locally because of the high cost of living in Roswell. Overall, 34.2% of homeowner households and 56.9% of renter households in Roswell pay more than 30% of their income on housing costs. While a much higher percentage of renters are cost burdened than owners, this lack of affordability does not appear to trend toward any particular type of community, but rather is an equal-opportunity statistic spread throughout the City. The City of Roswell also has limited number of subsidized and tax credit housing designated specifically for seniors and disabled persons.

13 Infrastructure

Public transportation plays a critical role in affordable housing stock to groups in need and others guaranteed protection under fair housing laws. The issue regarding transportation and fair house choice concerns accessibility to which a resident may travel from home to work. This issue is imperative as it deals with lower income areas or areas involving minority concentrations. For example, if there is a lack of accessible public transportation in a lower cost neighborhood, then that neighborhood becomes immediately inaccessible to those without other means of dependable transportation. This will particularly hinder mobility for very low-income residents, elderly residents, and persons with disabilities.

Table 55: Public Transportation Use for Workers

	2006-2010 Census Estimates	% of Total Commuters
Roswell	557	1.3%

Source: U.S. Census Bureau, American Community Survey 2006-2010, www.census.gov

Commuting in Roswell

As a governmental entity that is comprised of 42.02 square miles, a vast transportation network currently exists in the area for local residents and individuals who may be commuting within the area which includes local access roads, major thoroughfares, and accessible minor and collector streets. The 2010 American Community Survey (ACS) estimated that 1.3% of workers living in Roswell utilized public transportation as a means for commuting. Although an increasing number of transportation modes currently exist that such as walking, carpooling, biking, and driving, the most popular means for commuting to work is driving alone.

The following table estimates that as of 2010, 79.7% of Roswell residents commute to work driving alone using a car, truck or van. This compares to only 6.1% who carpool; 1.3% using public transportation; 1% walk; and 9.6% who work from home.

Table 56: Roswell Transportation Highlights

Public Transit use for Workers 16 and older Commuting to Work		
Method	Number of Commuters	% of Commuters
Car, Truck, or van and driving alone	35,034	79.7%
Car, Truck, or van and carpooling	2,677	6.1%
Public Transportation (excluding taxis)	557	1.3%
Walked	443	1.0%
Other Means	1,010	2.3%
Working from Home	4,236	9.6%

Source: 2006-2010 American Community Survey Estimates, www.census.gov

Table 57: Roswell Economic Profile Highlights

Roswell Economic Highlights	
Employment Status [Population 16 years and older]	
Population 16 years and older	65,848
In Labor Force	47,653
Civilian Labor Force	47,633
Employed	45,067
Unemployed	2,566
Armed Forces	20
Not in Labor Force	18,195
Commuting to Work [Workers 16 years and older]	
Car, Truck, or van and driving alone	35,034
Car, Truck, or van and carpooling	2,677
Public Transportation (excluding taxis)	557
Walked	443
Other Means	1,010
Working from Home	4,236

Source: 2010 American Community Survey Estimates, www.census.gov

Bus Services

The City of Roswell does not currently have its own public transportation service. The Metropolitan Atlanta Rapid Transit Authority (MARTA) provides public transportation to the residents and commuting workforce of the area. MARTA is a critical component of the infrastructure. MARTA operates 89 bus routes throughout its service area and 4 rail lines. More than 139 million transit rides were provided in 2011 although there are minimal bus routes that service the City of Roswell and no rail lines located within the City itself.

MARTA rates were amended in October 2011 and are reflected in the table below. The MARTA bus service runs Monday-Friday from 5:00 AM-1:30AM and on Weekends and Holidays from 5:00 AM-12:30 AM.

Table 58: MARTA Fares and Passes (as of December 2012)

General Fares	
Adult	Rate
Single Trip	\$2.50
Roundtrip	\$5.00
Senior (65 and older)	\$1.00
People with Disabilities	\$1.00
All Day Pass	\$9.00
2-Day Pass	\$14.00
3-Day Pass	\$16.00
4-Day Pass	\$19.00
7-Day Pass	\$23.75
30-Day Pass	\$95.00
Youth	
Youth (46" and under in height)	Free

Source: "Fares MARTA," www.itsmart.com

Of the 89 bus routes that are served by MARTA, only two of these, Routes 85 and 185, pass through the city boundaries for the City of Roswell. A map, as taken from the Transportation Master Plan of Roswell, is shown below.

Figure 17: Roswell Transit Map

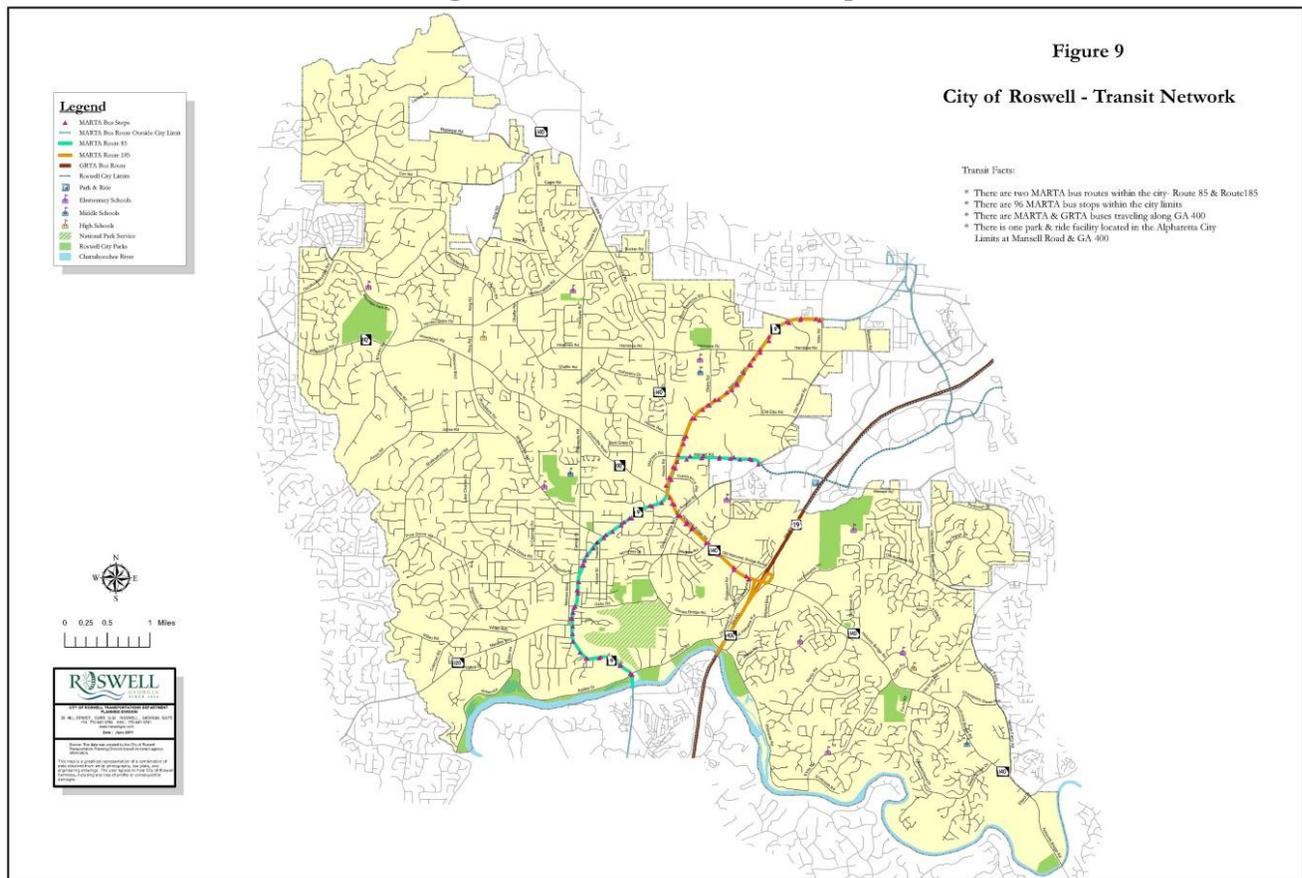
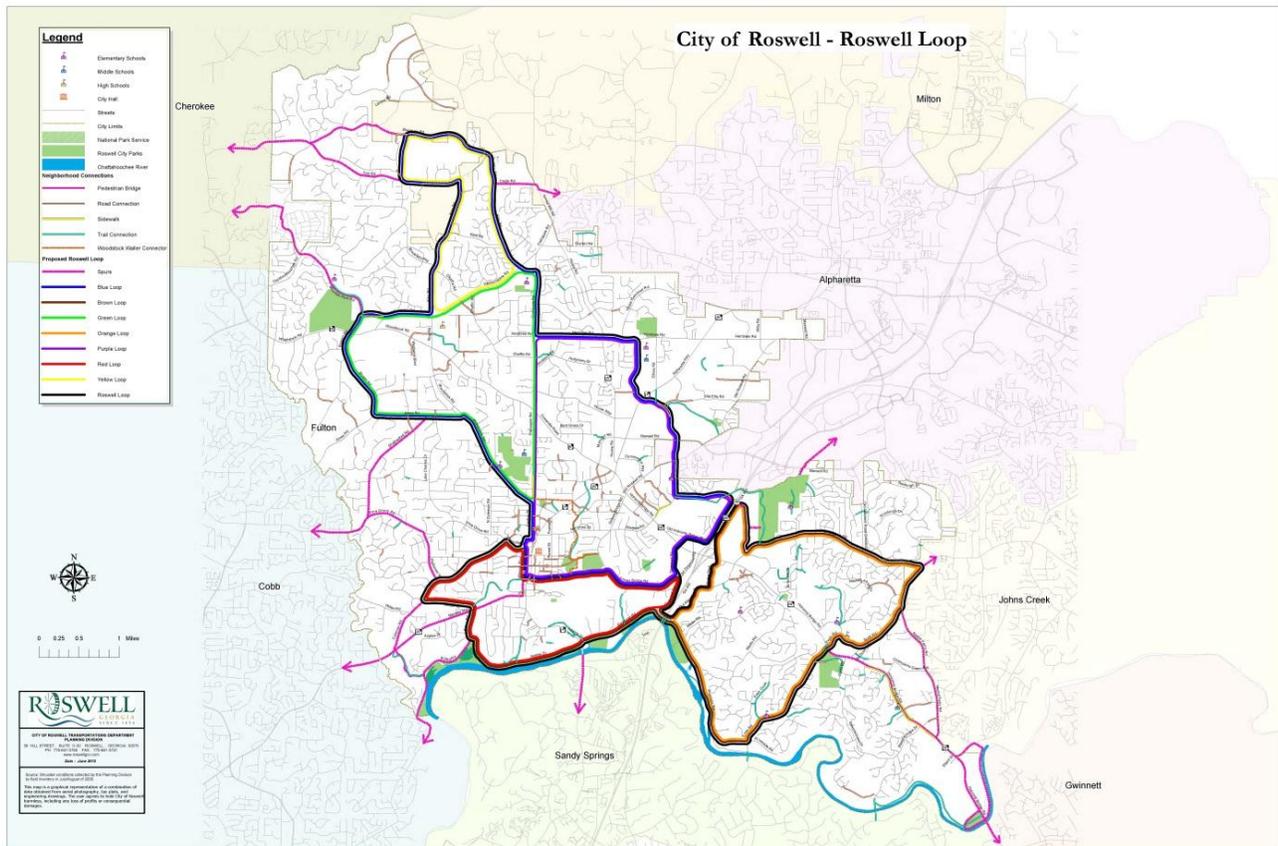


Figure 19: Roswell Loop Map



Source: www.roswellgov.com/transportation

According to the 2006-2010 American Community Survey estimates, 1.0 % of commuters walk to work daily and 2.3% of commuters use other means of transportation to work. While these numbers are increasing, they do not represent an adequate number of accessible areas for non-motorized transportation options.

Roads

The Roswell Transportation Department maintains all public roadways and continuously monitors road conditions. Major thoroughfares in the City of Roswell include:

- SR400/US19
- Holcomb Bridge Road (SR 140)
- Crossville Road (SR 92)
- Alpharetta/Atlanta Street (SR 9)
- Crabapple Road
- Hardscrabble Road
- Old Alabama Road
- Woodstock Road

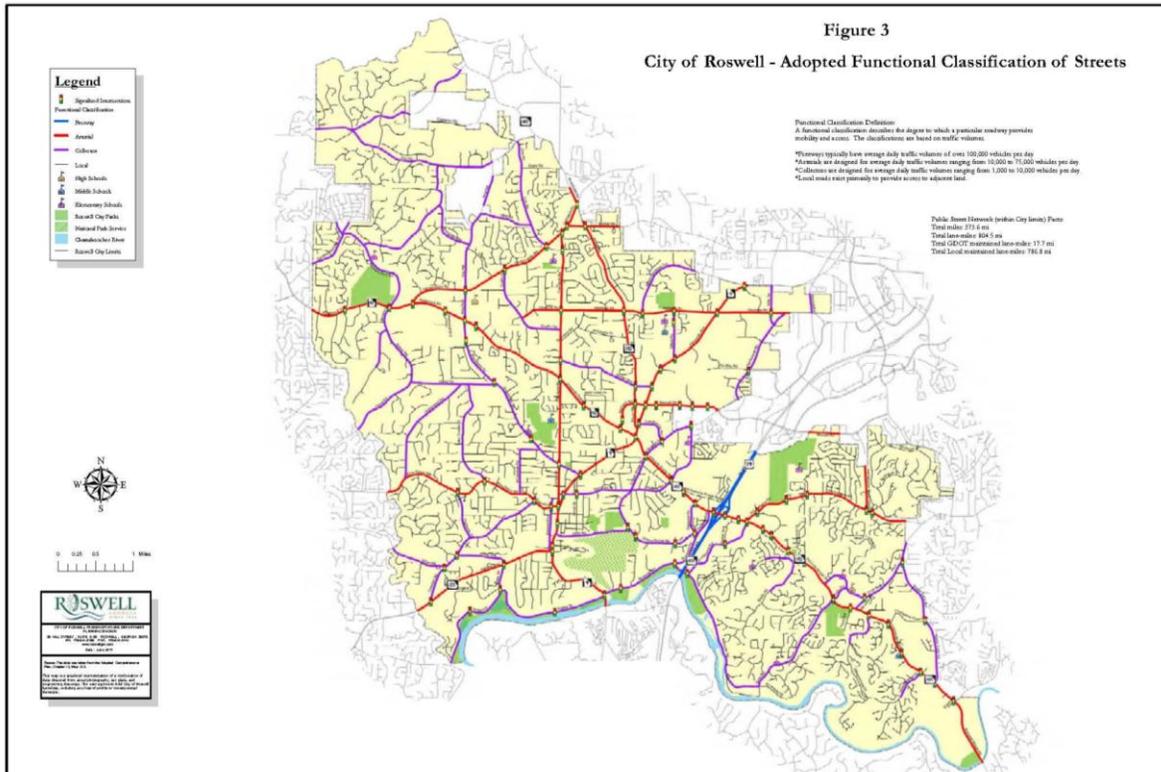
The complete network of roadways is comprised of 804.5 miles of connected roads and streets. While not all of these miles are classified as major roads, they are critical in their ability to provide access to all parts of the City for work, education, and overall reduction in congestion. Of the total land miles, 245 miles or 30% of those are classified as either arterial or collector streets that provide connected travel between destination points within the City.

Table 59: Total Lane Miles by Federal Highway Classification

Lanes Miles by Highway Classification		
Freeway	17.7	2%
Arterial	124.5	15%
Collector	120.5	15%
Local	541.8	68%

Source: Transportation Master Plan, <http://www.roswellgov.com>

Figure 20: Roswell Classification of Streets



Source: Transportation Master Plan, <http://www.roswellgov.com>

14 Land Use & Zoning

While private actions principally influence the housing market, regulations at the federal, state, and local levels significantly impact the market's ability to provide affordable housing units. The cost of housing and the incentives to develop, maintain, or improve affordable housing in Roswell are directly related. Although many barriers to affordable housing are beyond governmental control, several factors affecting housing costs can be identified at the municipal level. These factors can include zoning ordinances and land use controls. A review of the City of Roswell's comprehensive planning and zoning ordinances can assist the City to identify potential impediments to fair housing choice.

Comprehensive land use and planning is a critical means by which governments establish goals and objectives are set for activities such as transportation, housing, infrastructure, waste disposal, economic development, human services, education, land use, and recreation. The Comprehensive Plan also includes housing opportunities objectives to provide quality housing and a range of housing size, cost, and density that should be provided in each community, to make it possible for all who work in the community to also live in the community. Local governments must also project their future housing needs and plan for housing growth.

From a regulatory standpoint, local government measures to control land use through zoning often define the range and density of housing resources that can be introduced into a community. In communities across the United States (but not necessarily in the City of Roswell), the zoning provisions that most commonly result in impediments to fair housing choice include the following:

- Restrictive forms of land use that exclude any particular 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.
- Lack of typically affordable housing options such as apartments and multi-family units across various zoning districts.

A number of factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce development costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. Minimum required densities in multi-family zones ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for multi-family uses.

The Zoning Ordinance establishes zoning districts that correspond with land use designations. The development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare. Several aspects of the Zoning Ordinance can affect a person's access to housing or limit the range of housing choices. Jurisdictions are required to evaluate their land use policies, zoning provisions, and development regulations, and make proactive efforts to mitigate any constraints identified that may impede fair housing choices for residents.

In order to provide a comprehensive analysis of the zoning ordinance as it relates to fair housing, a checklist that was created as part of a "Review of Public Policies and Practices (Zoning and Planning

Codes)” by the Los Angeles Fair Housing Office of HUD will be utilized. This section will be an analysis of those questions posed through that checklist, which is listed in its entirety in Appendix X. It should be noted that the zoning impediments identified in this analysis reflect potential fair housing concerns that should be monitored by the City of Roswell and are only recommendations to affirmatively further fair housing in Roswell.

City of Roswell Zoning & Development Standards

The City of Roswell governs all land development activity within the municipal boundary through the established regulations of the Roswell Zoning Ordinance. The zoning ordinance adopted in 1971 and last amended in December 2012.

The purpose of the zoning ordinance was established in 1971 as follows:

“...purposes of regulating the location, height, bulk, number, size and appearance of buildings and structures, the size of yards and other open spaces, the density and distribution of population, the uses of buildings and structures and land for trade, industry, commerce, residence, recreation, public activities or other purposes; preserving buildings, structures or areas having national, regional, state or local historical significance; creating zoning and overlay districts for said purposes and establishing the boundaries thereof; providing for environmental protection through the regulation of trees, rivers, streams, floodplains, and watersheds; providing for the imposition of development impact fees; defining certain terms used herein; providing for the method of administration and amendment; defining the powers and duties of the planning commission, board of zoning appeals, historic preservation commission, and design review board; providing penalties for violation; and for other purposes.”²²

A map depicting current land use for the City of Roswell is shown on the following page:

²² “The Official Zoning Ordinance of the City of Roswell,” Article 1. www.municode.com

Table 60: City of Roswell Residential Zoning Districts

Established Residential Zoning Districts	
District	Description
E-1	Single-Family Estate Residential District
E-2	Single-Family Low Density Residential District
R-1	Single-Family Suburban Residential District
R-2	Single-Family Medium Density Residential District
R-TH	Fee-Simple Townhouse District
R-THA	Fee-Simple Townhouse Medium Density District
R-3	Multi-Family Residential District
R-3A	Multi-Family Medium Density District
R-4	Multi-Family Residential District
R-4A	Multi-Family Medium Density District
R-5	Planned Residential Development District
R-PUD	Residential Planned Unit Development
R-HIST	Residential Historic District

Source: The Official Zoning Ordinance of the City of Roswell," Chapter 4.1. www.municode.com

Minimum lot sizes for single-family detached dwellings among the residential zoning districts, which are listed in the above table, range from 7,500 square feet for the R-4 district to 87,120 square feet for the E-1 zoning district. This wide range of minimum lot sizes for single family homes does provide flexibility to developers and allows a variety of siting areas and locations for single family dwellings. These dwellings are permitted in by right in each of the residential zoning districts listed above. However, minimum lot sizes for multi-family units range from 4,500 square feet in the R-4, R-4A, and R-PUD to 6,000 square feet in the R-3 and R-3A districts. These five zoning districts are the only districts where it is permitted by the City of Roswell for multi-family units to be located. Mobile homes, while not outlawed completely within the City, are only permitted as a conditional use in the R-4 zoning district. In Roswell, R-4 is available for the location of mobile homes. This zoning district has a minimum lot size of 7,500 square feet. This wide range of lot size requirements provides significant flexibility to housing developers and permits a variety of housing options, including single-family detached, in an affordable price range. Accordingly, the City of Roswell residential zoning ordinance does not appear to impose unreasonably restrictive lot sizes that would effectively disallow affordable housing development.

Residential Uses

The zoning code for the City of Roswell provides definitions for various types of residential uses that are taken in to account and permitted by zoning district. The list is considered to be broad in scope as it addresses a wide range acceptable residential uses to include:

- **Assisted Living Facility:** Residences for the frail elderly that provide rooms, meals, personal care, and supervision of self-administered medication. They may provide other services incidental to the above. For purposes of this ordinance, assisted living facilities are considered institutionalized residential living and care facilities.
- **Dwelling Unit:** A building, or portion thereof, designed, arranged and used for living quarters for one (1) or more persons living as a single housekeeping unit with cooking facilities, but not including units in hotels or other structures designed for transient residence.
- **Family Day Care Home:** A private residence in which a business, registered by the State of Georgia and licensed by the City of Roswell, is operated by any person who receives therein (for pay) for supervision and care for fewer than twenty-four (24) hours per day, three (3) to not more than six (6) children under eighteen (18) years of age who are not residents in the

same private residence. For purposes of this ordinance, a family day care home may be operated as a home occupation, subject to the requirements of this ordinance.

- **Independent Living:** Adults at least fifty-five (55) years of age or older living within multi-family rental properties with central dining facilities that provide residents, as part of their monthly fee, access to meals and other services such as housekeeping, linen service, transportation, and social and recreational activities. Such properties do not provide, in a majority of the units, assistance with activities of daily living (ADLs) such as supervision of medication, bathing, dressing, toileting, etc. There are not licensed skilled nursing beds in the property
- **Institutional Residential Living and Care Facilities:** An umbrella term that encompasses the following uses as specifically defined in this ordinance: assisted living facility, independent living, intermediate care home, nursing home, skilled nursing care facility, and personal care home.
- **Intermediate Care Home:** A facility which admits residents on medical referral; it maintains the services and facilities for institutional care and has a satisfactory agreement with a physician and dentist who will provide continuing supervision including emergencies; it complies with rules and regulations of the Georgia Department of Human Resources. The term "intermediate care" means the provision of food, including special diets when required, shelter, laundry and personal care services, such as help with dressing, getting in and out of bed, bathing, feeding, medications and similar assistance, such services being under appropriate licensed supervision. Intermediate care does not normally include providing care for bed patients except on an emergency or temporary basis.
- **Nursing Home:** A facility which admits patients on medical referral only and for whom arrangements have been made for continuous medical supervision; it maintains the services and facilities for skilled nursing care, rehabilitative nursing care, and has a satisfactory agreement with a physician and dentist who will be available for any medical and/or dental emergency and who will be responsible for the general medical and dental supervision of the home; it complies with rules and regulations of the Georgia Department of Human Resources
- **Rooming House:** A building where, for compensation, lodging only is provided for not more than ten (10) persons.

Definition of "Family"

The City's definition of family as stated in the zoning code is:

An individual; or two (2) or more persons related by blood, legal adoption or marriage within the third degree of consanguinity or within the second degree of affinity, and no more than two (2) other persons who are not related within the third degree of consanguinity or within the second degree of affinity. The degree of consanguinity or affinity is computed by the civil law method. An individual's relatives within the third degree of consanguinity are the individual's parent or child (relatives in the first degree); brother, sister, grandparent or grandchild (relatives in the second degree); and great-grandparent, great-grandchild, aunt who is a sister of a parent of the individual, uncle who is a brother of a parent of the individual, nephew who is a child of a brother or sister of the individual, or niece who is a child of a brother or sister of the individual (relatives in the third degree). Two (2) individuals are related to each other by affinity if they are married to each other, as defined by O.C.G.A. § 19-3-3.1, or the spouse of one (1) of the individuals is related by consanguinity to the other individual. A husband and wife are related to each other in the first degree by affinity. For other relationships by affinity, the degree of relationship is the same as the degree of the underlying relationship by consanguinity. As it relates to E-1, E-2, R-1, R-2 or R-3 single-family housing, "family" does not include:

(1)Any society, club, fraternity, sorority, association, lodge, combine, federation, coterie or any like organizations;

(2)Any group of individuals whose association to each other is temporary and/or seasonal in nature;

(3)Any group of individuals who are in a group living arrangement as a result of a criminal offense.

The City's zoning code does implement restrictions on the number of unrelated persons living in a structure by zoning district. For example, the E-1, E-2, R-1, R-2, and R-3 zoning districts restrict the members of a dwelling for a single family of two (2) unrelated persons. The City of Roswell's zoning ordinances is restrictive in its definition of family and prohibits more than two unrelated person from living together in a dwelling unit which decreases fair housing choices. Sharing rent payments with unrelated roommates is a common method for low and moderate income individuals to achieve affordable housing with little to no cost burden. Additionally, the help of an unrelated live-in aide is sometimes desired by the elderly or persons with disabilities.

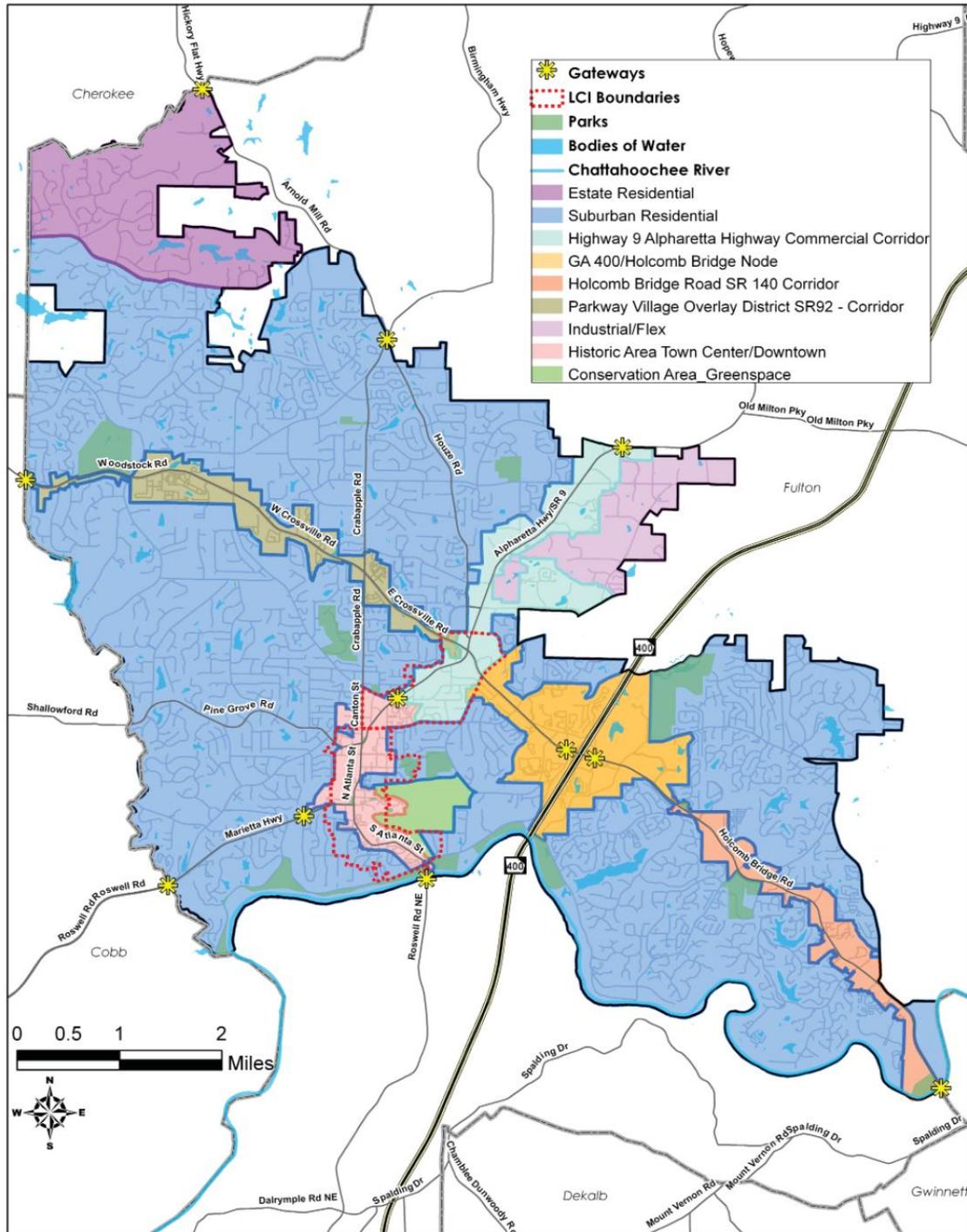
Land Use Regulation

An examination of the general land use regulations included a review of the title and purpose statement, definitions of zoning, inclusionary zoning regulations, and treatment of non-conforming uses. Communities are directly impacted permissible lot size dimensions, density maximums, building height limits, and other land use practices which have a direct influence of the affordable of housing. The City's land use regulations state:

- *Lot Size:* Although most common lot size permitted in the zoning ordinance is 9,000 square feet, which is not the most accommodating size for the development of affordable housing there are zoning districts that permit lot sizes of 6,000 square feet for a single unit dwelling. This may be reduced within the R-4 and R-PUD districts where a two-family dwelling may have a minimum lot size of 4,500 square feet.
- *Building Height Limits:* The zoning code does allow for higher density developments as determined by the acre threshold in R-4 zoning districts, up to 14 units can be built per acre. However, in E-1 zoning district limits a maximum of 0.5 units per acre. The maximum building height in residential zoning districts other than R-4, R-4A, and R-PUD is 35-45 feet.

The map on the following page depicts future development map use plan for Roswell.

Figure 22: City of Roswell Future Development Map
community vision & future development



Source: Imagine Roswell 2030 Comprehensive Plan, www.roswellgov.com

Summary of Findings

Comprehensive planning, zoning, and growth controls have the potential to greatly affect the availability of affordable housing. While zoning may positively impact and control the character of communities, the City must consider its role in assuring it is not involved in promoting barriers to equal housing. In considering how zoning might create barriers to fair housing. The key areas reviewed in this analysis included definitions used for “families” and “group homes”; regulations (if any) regarding group homes; ability for group homes or other similar type housing to be developed; and unreasonable restrictions on

developing multifamily units, such as lot size requirements. The specific zoning areas were selected because of the possible adverse effects they could have on families and persons with disabilities.

After review and examination of the zoning codes, it was determined the City of Roswell residential zoning ordinance does not appear to impose unreasonably restrictive lot sizes that would effectively disallow affordable housing development. The minimum lot sizes for single-family detached dwellings among the residential zoning districts range from 7,500 square feet in the R-4 district up to 87,120 square feet in the E-1 zoning district. This wide range of minimum lot sizes for single family homes does provide affordable housing options for developers of single family dwellings. The minimum lot sizes for multi-family units range from 4,500 square feet in R-4, R-4A, and R-PUD districts to 6,000 square feet in R-3 and R-3A districts.

However, the City's zoning ordinance in regards to the definition of family is not conducive towards occupancy standards for affordable housing. The definition of "family" identified in the City's zoning code is a restrictive definition, which limits the number of unrelated persons who may live together. In addition, it also restricts the ability of residents to live with roommates or aides to increase the affordability of housing. This prohibition is a significant barrier to the development and siting of any housing for residents with disabilities in Roswell. The City's zoning ordinance does not include provisions for group homes. Group living arrangements are often necessary to enable people with disabilities to secure the support they need to live in the community.

The current zoning definitions for the City do not contain language referring to "affordable housing". An adequate supply of affordable housing, both for ownership and rental, is essential for an open and inclusive housing market in Roswell. Affordable housing is generally defined by HUD as housing costs that are no more than 30% of a household's gross annual income. According to the 2011 ACS, 34.2% of homeowners with a mortgage and 56.9% of renters in Roswell expended more than 30% of their income on monthly housing costs in short, over a third of Roswell's households reside in unaffordable housing, resulting in harm to their overall economic well-being.

15 Current Impediments and Recommendations

Impediment #1: Lack of Available Land Limits Development of New Affordable Owner-Occupied and Rental Housing

In recent years, the City has experience a significant population growth, which has led to a robust private housing market that has increased the cost of housing for owners and renters in Roswell. According to HUD, in 2012 the City of Roswell had a median family household income (MFI) of \$69,300, while the median value for a single-family home in Roswell was \$274,300. Currently, Roswell has a significant percentage of homeowners spending more than 30% of their annual household income on housing-related costs. According to the 2011 ACS, 34.2% of homeowners with a mortgage pay more than 30% of their income on monthly housing costs. Conversely, 56.9% of renters spent more than 30% of their income on rent. While a much higher percentage of renters are cost burdened than owners, this lack of affordability does not appear to trend toward any particular type of community, but rather is an equal-opportunity statistic spread throughout the City. In addition, the City also has limited number of subsidized and tax credit housing designated specifically for seniors and disabled persons.

Recommendations:

The City of Roswell must actively address the need to increase the supply of affordable rental and owner-occupied housing by expanding incentive programs that encourage and enable more private developers to create affordable housing. In an effort to address this impediment, the City has allocated \$177,587 of its Program Year 2013 CDBG funding and \$50,000 in HOME Program Funds as gap financing in a Low Income Housing Tax Credit (LIHTC) application for the Roswell Housing Authority.

The City of Roswell should continue its support of LIHTC programs as well as continue its participation with Georgia Initiative for Community Housing (GICH) through the Georgia Department of Community Affairs, which is a three-year program of collaboration and technical assistance to assist the City in addressing their housing and neighborhood revitalization needs.

Impediment #2: Zoning Restrictions

The City's zoning ordinance in regards to the definition of family is not conducive towards occupancy standards for affordable housing. The definition of "family" identified in the City's zoning code is a restrictive definition, which limits the number of unrelated persons who may live together. In addition, it also restricts the ability of residents to live with roommates or aides to increase the affordability of housing. The City's zoning ordinance also does not include provisions for defining group homes or "affordable housing". Group living and affordable housing arrangements are often necessary to enable people with disabilities to secure the support they need to live in the community. A key indicator of housing affordability is reflective of residents housing expenditures that exceed 30% of household income.

Recommendations:

It should be noted that the zoning impediments identified in this analysis reflect potential fair housing concerns that should be monitored by the City of Roswell and are only recommendations to affirmatively

further fair housing in Roswell. It is recommended that the City's Community Development Department conduct further studies to review and revise the zoning ordinance definition to include provisional zoning exceptions for families, group homes and homeless shelters. The City should establish a definition of affordable housing within the City of Roswell using accurate and reliable indicators such as income of City residents, quality of housing units, and the availability of housing. Using this new definition, the City and conduct an accurate assessment of its livable and affordable housing supply.

The City of Roswell is proactively addressing the implications for zoning revisions to include the definition of familial status and affordable housing by conducting a thorough assessment of its Unified Development Code (UDC). The zoning revision process began in May 2012 and is expected to be completed by January 1, 2014.

Impediment #3: Lack of Fair Housing Education, Testing and Enforcement Capacity

Education and awareness of fair housing laws are imperative to alleviating housing discrimination and should be an ongoing activity if it is to address the lack of general awareness concerning Fair Housing issues among residents and professionals in Roswell. Additionally, fair housing education must be presented in a manner that is linguistically appropriate and culturally sensitive. Coordination among fair housing organizations is a key component to educating the public about housing discrimination and fair housing rights. Roswell is indirectly served by only one organization whose mission involves fair housing education, testing and enforcement. Based on the results of the Fair Housing Survey, 62.7% of Roswell residents are somewhat knowledgeable of their fair housing rights. Of those residents who reportedly faced housing discrimination but chose not to file a complaint, the predominant reason for not filing was that *"they didn't know what good it would do"* (45%) followed by *"not knowing where and how to file a complaint if they feel their rights have been violated"* (30%) and *"fear of retaliation"* (20%).

Recommendations:

The City of Roswell should annually reserve a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing awareness and testing program in Roswell. As an additional component of the Fair Housing Grant, the successful applicant should launch and sustain a robust fair housing public interest ad campaign to increase the public's awareness of housing discrimination and of the process for filing a complaint and increase opportunities for representation of victims of discrimination in the pursuit of legal recourse. Further, Roswell should work toward increased coordination among the area's fair housing organizations by convening representatives of the organizations for the purpose of preparing a written plan outlining the goals and responsibilities of each organization in fair housing education, testing, and enforcement. Finally, the City of Roswell should sponsor specific education opportunities on Fair Housing Act through its Neighborhood Improvement Team to conduct periodic education and fair housing compliance information to landlords, builders, real estate agents, and the public at large, making periodic training participation mandatory for City staff and entities contracting with the City.

16 Conclusion

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

The recommendations proposed in this document address impediments relative to the limited availability of land to construct new affordable housing, zoning restrictions, and lack of fair housing education, testing, and enforcement capacity. Implementation of the recommendations can assist the City of Roswell in achieving the reality of being an open and inclusive community that truly embraces Fair Housing Choice for all its residents.