



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

BACKGROUND

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

As a recipient of funding from the Department of Housing and Urban Development, HUD requires Clayton County to complete an Analysis of Impediments to Fair Housing (AI). The AI studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; disproportionate housing needs; locations, occupancy, and policies for publicly supported housing; disability and access; and fair housing enforcement and outreach resources and activities. Based on the findings of this research, the AI proposes fair and affordable housing strategies to overcome the identified fair housing issues. This Executive Summary provides a brief overview of the study's key findings, followed by an outline of fair housing goals and related actions.

COMMUNITY INVOLVEMENT

Public input from local residents and other stakeholders was a key component of the AI research. Mosaic Community Planning worked closely with Clayton County staff on a variety of approaches to achieve meaningful engagement with the community on fair housing topics.

Community Workshops

Clayton County held three community workshops in April 2023 (two in-person and one virtual). Ten (10) members of the public participated in the community workshops.

Community Survey

A Housing and Community Needs Survey was available to residents in both online and hard copy formats. A total of 158 responses were received from members of the public.

Stakeholder Interviews & Forum

The planning team conducted both individual stakeholder interviews and a group stakeholder forum with staff from a variety of service organizations. Discussion topics included community development and housing needs, successful housing and community development initiatives and how they might be replicated, availability of public resources, and barriers to fair housing and access to opportunity. A total of 13 community stakeholders participated in a stakeholder interview.

Focus Groups

In addition to community meetings, the planning team also held three focus groups targeting seniors in order to understand their specific housing needs in May and June 2023. Three separate senior centers hosted these groups, and a total of 81 senior Clayton County residents participated.

Social Media & Web Outreach

Mosaic Community Planning worked closely with Clayton County's Office of Communications to ensure a broad distribution of community engagement opportunities. These methods included posting information on the County's website and on County social media pages such as Facebook, NextDoor, Twitter, and LinkedIn.



COMMUNITY FEEDBACK

Below is a summary of feedback received from Clayton County residents through methods described on the previous page. Residents emphasized the importance of the following in ensuring fair housing choice:

Housing needs: Residents and stakeholders emphasized a variety of housing needs in Clayton County, including a lack of quality and variety in available housing types and a lack of senior housing responsible for displacing aging lifelong residents of Clayton County. Residents also emphasized a need for middle-income workforce housing in addition to low-income housing, and for programs such as down payment assistance and first-time homebuyer's education.

Segregation: Residents and stakeholders noted that segregation within Clayton County is largely based on income rather than on race or ethnicity. While some neighborhoods contain pockets of Asian or Hispanic immigrants, this clustering is likely by choice in order to maintain cultural connections. Residents did note a disparity between the general demographic makeup of Clayton County residents in comparison to business owners, observing that Clayton County's population is largely Black but that business owners are largely white.

Access to resources: Residents noted that one of Clayton County's strengths lies in its parks, which are generally attractive and well maintained throughout the county; however, there are geographic discrepancies in access to other resources such as transit, well-maintained roads and sidewalks, and grocery stores.

Residents' thoughts about fair housing: While several organizations and agencies provide fair housing education and enforcement in Clayton County, residents and stakeholders indicated that coordination between these agencies could be improved to reach more people. Residents also observed that advertising of available services increased during COVID but could still use improvement, especially noting a need for in-person materials available at libraries, senior centers, coffee shops, and more for residents who may not have internet access or high levels of computer literacy.

Barriers to fair housing: Residents noted several factors that may contribute to barriers to fair housing, and most or all of these factors are related to income or affordability. One prominent issue mentioned by participants in the community engagement process was that Clayton County housing prices are rising due to competition stemming from their relative affordability in comparison to commuters trying to avoid Atlanta housing prices, leaving Clayton County workers unable to afford housing in their own county.

WHO LIVES IN CLAYTON COUNTY?

Clayton County, Georgia is home to approximately 297,595 residents, making up nearly 5% of the total residents in the Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (MSA). Clayton County's population has grown significantly over the past 20 years, with an increase of 25.8% between 2000 and 2021.

Race & Ethnicity

Understanding the racial and ethnic make-up of an area is important when considering housing equity, as barriers to fair housing frequently have roots in current or historic racial inequity.

Black residents make up the predominant racial and/or ethnic group within Clayton County, accounting for 69% of residents. This is a significant increase from a 51.1% population share in 2000. Hispanic or Latino residents hold the second largest population share at 14.3%, nearly double their 7.5% share in 2000. In contrast, white residents have declined significantly in population share from 34.9% to 8.7% within the same time period. Asian or Pacific Islanders and Native American residents have maintained relatively stable population shares since 2000, now comprising 4.6% and 0.2% of the population respectively.

Family Types

Studying which household and family types are most common in an area is important when assessing the need for different housing types - for example, families with children typically want larger housing units with larger lots than elderly householders.

The most common household type in Clayton County is a single female householder with no children, accounting for 29.5% of all households, followed by married couples without children, accounting for 20.3% of all households. Overall, 36.2% of Clayton County households have children, and 20.7% of all households have one or more members ages 65 or older. Most senior residents live with other family members - only 2.3% of residents live alone by age 65.

Age & Disability

Clayton County's senior population has nearly doubled since the year 2000, when 5.6% of the population was age 65 or over; by 2021, seniors comprised 10.2% of the population. During the same time, the shares of the population who were children or working age declined.

About 11% of Clayton County residents have at least one disability, with ambulatory, cognitive, and independent living difficulties being the three most common disability types. As disability rates increase with age, Clayton County's age and disability statistics have important implications for future housing decisions.

Limited English Proficiency (LEP)

Assessing English proficiency and the need for other language access is an important factor in promoting fair housing. 8.7% of Clayton County's population speaks English less than "very well". The primary language spoken by these households is Spanish, followed by various Asian or Pacific Islander languages such as Vietnamese.

National Origin

Areas that have large immigrant populations sometimes have specialized housing needs in order to account for cultural enclaves, or people choosing to live near others who share their same culture, or cultural differences, such as multi-generational households. In Clayton County, nearly 13% of residents are immigrants from a country of birth other than the United States. The most common countries of origin are Mexico and Vietnam, which is reflected in data on languages spoken by households with limited English proficiency.

CLAYTON COUNTY'S AVERAGE HOME

Examining an area's current housing stock can provide a picture of its strengths, weaknesses, and housing needs. Data examined in the AI shows that housing stock in Clayton County has grown faster than the population over the past 20 years, indicating that Clayton County likely has an overall adequate supply of existing housing based on population size and that any actual or perceived existing housing shortages are likely tied to factors such as affordability, housing condition, and unit type. Residents and stakeholders noted that variety in size and affordability were two key issues contributing to a lack of housing access in Clayton County.



A Single-Family Structure

The largest share of housing units are single-family detached structures (65%), followed by small multifamily buildings of 5 to 19 units (18%). Single-family attached structures comprise about 4% of properties, and about 5% of units are in large multifamily buildings of 20 or more units. About 6% of units are in duplexes, triplexes, or quadruplexes.



Owner-Occupied

Out of the 103,399 occupied units in Clayton County, just over half (52%) are owner-occupied. According to the Zillow Home Value Index, the median sale price of homes in Greenville was approximately \$246,000 as of August 2023. The Zillow Observed Rent Index estimates typical rent in Clayton County is approximately \$1,775 as of July 2023.

2-3

Bedrooms

Almost all homeowner occupied housing in Clayton County has at least two bedrooms: 59% has two or three bedrooms and 40% has four or more bedrooms. Rental units tend to be smaller: 13% of units are one-bedroom units, 74% have two or three bedrooms, 33% have three or more bedrooms, and only 14% have four or more bedrooms.

40+

Years Old

37% of Clayton County's housing stock was built in 1980 or earlier, which can indicate quality issues more common in aged housing. However, an additional 30% of Clayton County housing was built in 2000 or later, indicating a new demand for more residential units that matches the county's population growth over the same time period.

ACCESS TO OPPORTUNITY

Background

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

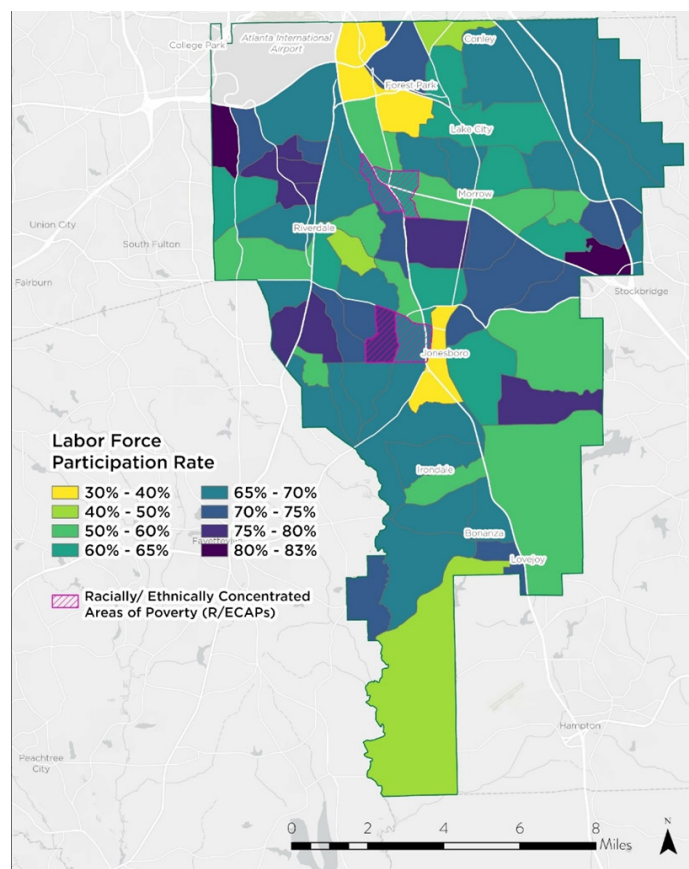
Labor Market Engagement

An estimated 66.3% of the population aged 16 and over in Clayton County participates in the labor force, a slightly lower share than that of the Atlanta-Sandy Springs-Alpharetta metropolitan area (67.4%) but higher than that of the state of Georgia overall (63.6%). Geographic disparities exist, with labor force participation rates ranging from 30.9% to 82.8% in census tracts across the county. Census tracts with low labor force participation rates are clustered in and around Jonesboro, Forest Park, Riverdale, Conley, and south of Bonanza/Lovejoy. In five census tracts in these areas, the labor force participation rate falls between 30% and 50%. Participation tends to be highest in census tracts just south of the Atlanta airport and north of Riverdale, near Stockbridge, to the west and southeast of Jonesboro, and south of Morrow. In 11 census tracts in these areas, the labor force participation rate is 75% or higher.

Education

20.2% of Clayton County residents over age 25 have a bachelor's degree or higher. Geographic disparities in educational attainment exist, with the percentage of residents with bachelor's degrees or higher ranging from 1.8% to 43.9% across the county's census tracts. Residents of parts of south and central Clayton County—including areas in and to the east of Lovejoy, east and west of Jonesboro, and in and south of Morrow—tend to have the highest levels of educational attainment. Educational attainment tends to be lowest in parts of north and central Clayton County, including census tracts in and around Forest Park, Jonesboro, and Irondale.

Public schools in Clayton County fall within the Clayton County Public Schools District, which includes 66 schools that serve more than 58,000 students.



Labor Force Participation Rate in Clayton County, 2017-2021

Education (cont'd)

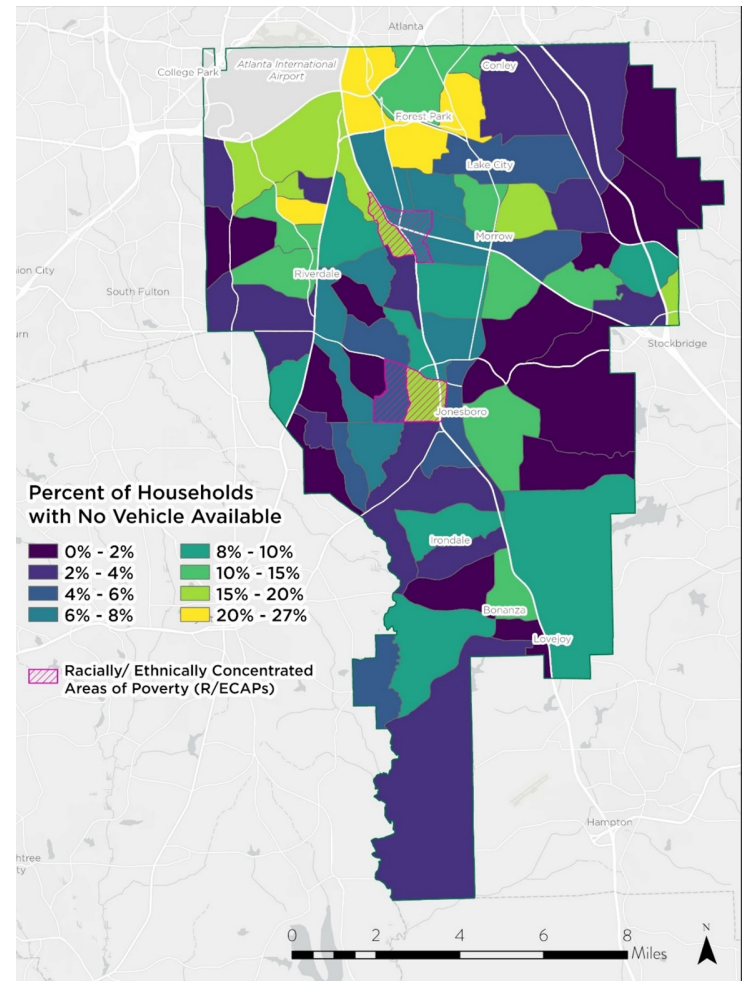
Content mastery, which assesses whether students are achieving at the level necessary to be prepared for the next grade, college, or career, is low across schools in the district, averaging 33.5 out of 100 among elementary schools, 36.2 among middle schools, and 39.8 among high schools. These levels are significantly lower than those in the state as a whole, which range from about 60 to 65. Graduation rates in the district are slightly lower than those in the state overall (79.6 and 84.7, respectively).

Transportation

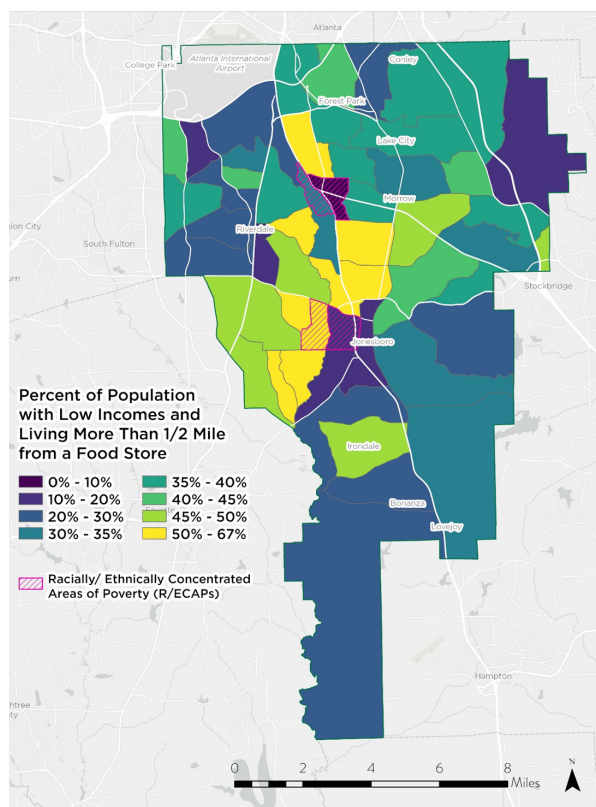
Metropolitan Atlanta Rapid Transit Authority (MARTA) provides bus and mobility service in Clayton County. As MARTA continues to expand services in the county, the agency has proposed the implementation of Bus Rapid Transit (BRT) through the Southlake and State Route 54 BRT lines as an alternative to commuter rails. To connect customers in areas underserved by transit to the greater MARTA system, MARTA's app-based ridesharing service, MARTA Reach, is being piloted at the Gillem Logistics Center in Clayton County. 32.4% of community members who responded to the fair housing survey noted that they have access to reliable bus service in their neighborhoods; 21.6% said they 'somewhat' have access; and 31.1% indicated that they do not have access to reliable bus service. When asked whether bus service is equally provided throughout all communities in the county, a majority of respondents (50.7%) said no, while just 22.1% said yes.

Access to vehicles also shapes residents' ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. An estimated 7.3% of households in Clayton County do not have a vehicle, and disparities exist by geography and reflect access to bus service in the county. Vehicle access is lowest in parts of Forest Park and north of Riverdale, areas in which 20% to 27% of households do not have a vehicle.

Residents and stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and with limited access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where bus service is most accessible.



Vehicle Access in Clayton County



Food Access in Clayton County

Food Access

The share of Clayton County residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in census tracts in southwest Forest Park, east Riverdale, west of Jonesboro, and south of Morrow. In seven census tracts in these areas, 50% to 67% of residents have low incomes and live more than one-half mile from a supermarket. In seven additional tracts in and around south Riverdale, south Morrow, and Irondale, 45% to 50% of residents meet the USDA definition of low income and low access at one-half mile. In contrast, portions of Jonesboro, Riverdale, and the area west of Morrow tend to have the lowest shares of residents with low incomes who live more than one-half mile from a supermarket. In three census tracts in these areas, fewer than 15% of residents are considered low-income and low-access.

Survey respondents echoed concerns surrounding food access, with 62.1% noting that grocery stores and other shopping opportunities are not equally available in all communities.

Environmental Analysis: Parks & Air Quality

During the community participation process, many Clayton County residents commented positively on Clayton County's parks; however, some disparities still exist. The Trust for Public Land estimates the need for parks by census block group based on population density, density of low-income households, density of people of color, rates of poor mental health and low physical activity, urban heat islands, and pollution burden. Based on these factors, in Clayton County the need for parks is greatest in parts of Riverdale, Irondale, and Conley. Parks are most accessible in parts of Forest Park, Lake City, Jonesboro, Lovejoy, and Bonanza.

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. The EPA's National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment uses data from 2019 to examine cancer risk from ambient concentrations of pollutants. Clayton County has low to moderate levels of cancer risk from air toxins—about 30 to 40 per million in county census tracts. Point sources of emissions are clustered at the airport, in Forest Park, and between Jonesboro and Morrow.

Toxic release inventory sites are clustered in north and central Clayton County. In particular, the Polynt Composites USA Inc. site has a potential risk score that is several times higher than those of other nearby facilities, indicating significantly greater health risks for residents living near the facility.

HOUSING ASPECTS

Housing Problems

The AI analyzes four unique housing problems as defined by HUD: cost burden, overcrowding, dwellings lacking complete kitchen facilities, and dwellings lacking complete plumbing facilities. In Clayton County, renters are nearly twice as likely as owners to experience housing problems - 50.7% of renters experience one or more of these housing problems, in comparison to just 26% of owners. The most common type of housing problem in Clayton County is cost burden, meaning that a household is spending more than 30% of its income on housing. Housing problems of any type disproportionately impact protected classes: in Clayton County, disabled residents experience higher rates of housing problems than residents without disabilities, and Black and Hispanic residents experience higher rates of housing problems than white residents.

Publicly Supported Housing

Clayton County contains 3,028 publicly supported housing units maintained by the Housing Authority of Clayton County. These units account for just 0.2% of Clayton County's total housing stock, indicating a significant need for more publicly supported units. The most common publicly supported housing type in Clayton County is Housing Choice Voucher (HCV) units, or rental units whose tenants pay for part of their rent with a voucher from the county. The second most common type is LIHTC units, or units which are intentionally kept at a lower cost as part of an agreement in which the developer receives tax credits for supporting affordable housing. Other unit types include Project-Based Section 8 units and public housing developments.

Disability and Access

About 11% of Clayton County residents, or about 32,000 people, have at least one disability, with ambulatory, cognitive, and independent living difficulties being the three most common disability types. As disability rates increase with age, Clayton County's age and disability statistics have important implications for future housing decisions. Research has found that the U.S. generally has an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development estimates that approximately one-third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.

HUD's Resource Locator Tool indicates that Clayton County has around 600 affordable housing units that were designed to serve people with disabilities, but only 48 of these are specifically restricted for use by elderly and/or disabled residents. Other units displayed on GeorgiaHousingSearch.org's search for disability friendly residences vary significantly in price and level of accommodation - monthly rents for these advertised units ranged from \$664 to \$2,200. Based on a standard Supplemental Security Income (SSI) payment of \$914 per month (equating to an affordable rent of \$274 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing in Clayton County. In addition, the number of affordable disability-friendly housing units in Clayton County accounts for just 1.9% of the County's disabled population, indicating a significant need for increased affordable and disability-friendly housing.

FAIR HOUSING GOALS & PRIORITIES

This analysis identified five fair housing issues, along with goals designed to overcome the identified contributing factor and other related fair housing issues in Clayton County.

1. **Implement strategies to increase the quality, variety, and affordability of Clayton County housing stock.**

During the community participation process, many stakeholders stated that Clayton County does not have enough housing units to keep up with demand. However, data on housing growth within the County over the past 20 years indicates that new units have been constructed at a faster rate than the population has grown and that the number of vacant units in the County has more than doubled at the same time. This likely means that a perceived housing shortage is due to inadequate quality, variety, and affordability of existing units rather than to an overall lack of units.

Suggested strategies to overcome this issue include the following:

Expand rehabilitation assistance programs for both homeowner-occupied and vacant housing units

Explore options for incentivizing or supporting the development of unit types that are currently less common within Clayton County, including townhomes and larger rental units

Implement a down-payment and rental deposit assistance program specific to residents who also work within Clayton County

Implement wage data specific to Clayton County rather than to the MSA when working with developers on what constitutes affordable units

Create or further differentiate an affordable workforce housing category separate from the affordable low-income housing category and ensure that incentives exist for developers to participate in both categories

Decrease minimum lot and minimum unit sizes within single-family zoned areas

Implement a code or ordinance that allows accessory dwelling units, or ADUs, by right rather than by conditional use permit

Ensure that all residents are provided with informational materials on lead-based paint hazards and abatement options

2. **Increase housing choice and access for people with disabilities.**

In the fair housing survey conducted as part of this analysis, over half of the respondents agreed that either “some more” or “a lot more” housing for people with disabilities is needed in Clayton County. Nearly 4 in 5 respondents said the same about senior housing options. While a need for additional senior housing is not necessarily the same as a need for accessible housing for people with disabilities, the two needs are related, as seniors aged 65 and over have relatively high rates of disability. Data analyzed in this report found that 44% of Clayton County’s disabled population has at least one housing problem, in contrast to 38.5% of the population at large; additionally, of the 40 housing discrimination complaints received and investigated by HUD since 2018, disability was the most frequently cited basis named in 43% of all cases.

Suggested strategies to overcome this issue include the following:

Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities

Review & amend Clayton County zoning ordinances to clarify where residential substance abuse treatment facilities may be located, taking care to ensure these uses may be permitted within residential zoning districts; to revise the zoning code’s family definition to mean a “functional family” or remove it altogether; and to reconsider the use of spacing requirements imposed on group and personal care homes and codify a justification for the spacing if warranted

Draft and adopt local code amendments that would expand transitional housing facility siting options and provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability

3. **Increase investment in areas with high poverty rates and/or low access to resources and services.**

Low levels of access to resources and services in areas with high levels of poverty also create barriers to access to opportunity in Clayton County. The need for neighborhood investment is particularly acute in parts of north and central Clayton County that have the highest poverty rates and lowest levels of access to resources such as fresh food retailers, healthcare, and high-performing schools, while public transportation and jobs are least accessible in south Clayton County.

Suggested strategies to overcome this issue include the following:

Use CDBG and other funding to collaborate on projects that develop, expand, or improve community spaces and programming, increase access to fresh food retailers, address blight, and support the development of needed retail and services in low- and moderate-income census tracts, particularly in R/ECAP census tracts

Investigate whether the Biden administration’s Community Revitalization Fund has the potential to provide additional financial resources to support investments in R/ECAPs and, if so, encourage and assist local Community Development Corporations in the application process

Collaborate with County leadership in investigating additional potential funding sources to support investments in public infrastructure, improvements, facilities, and services in low- and moderate-income census tracts

Partner with Clayton County Public Schools, community stakeholders, and others to provide facilities, resources, and services to students attending lower-performing schools

4. **Increase both labor market engagement and higher-paying job opportunities.**

Disparities in labor market engagement exist by geography, race, and ethnicity in Clayton County. These disparities in labor market engagement are shaped by the prevalence of low-wage jobs in the county, barriers to accessing existing workforce development and training programs, an overall lack of affordable housing, and limited access to public transportation in some areas of the county. Low levels of labor market engagement may drive down wages, thus restricting housing choice and access to opportunity among protected classes.

Suggested strategies to overcome this issue include the following:

Collaborate with key stakeholders in implementing workforce and economic development strategies contained in the Clayton County 2034 Comprehensive Plan

Keep track of developments in the Purpose-Built Communities program and consider opportunities to partner with local jurisdictions and other community stakeholders in joining the network or implementing a similar model to support investments in cradle-to-college education and community wellness along with investments in mixed-income housing

Explore ways to partner with and fund community organizations that have implemented workforce development and employment programs in areas of the city with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment

Collaborate with residents to understand barriers to accessing workforce development, employment, and education programs, and develop strategies to address these barriers

Collaborate with community development organizations on efforts to bring new development to high-poverty communities and neighborhoods to create jobs and provide needed resources and services, such as grocery stores, restaurants, retail, and services

Meet with affordable housing developers to understand and address barriers to developing affordable housing in high-opportunity neighborhoods with access to jobs and public transportation

Include residents, business owners, industry representatives, and representatives from neighborhood groups in planning processes for workforce and economic development programs

5. **Expand fair housing education in Clayton County.**

Clayton County has developed a strong and long-term relationship with Metro Fair Housing Services, Inc., a nonprofit fair housing advocacy organization that provides a wide range of fair housing education and enforcement activities. Having a strong partner with deep fair housing expertise has served Clayton County well. Metro has trained many of the County's Community Development staff in fair housing and, through a contract with the County, Metro facilitates educational workshops for Clayton County homebuyers and staffs a fair housing hotline to counsel residents who believe they may have experienced housing discrimination.

Even so, responses to the community survey conducted as part of this analysis suggest that the need for fair housing education is ongoing. Specifically, only 38% of respondents reported knowing their fair housing rights; a smaller share, only 33%, said they knew where to file a report of housing discrimination. These results indicate that education efforts have reached some residents, but there is still a need for continued outreach to the public and other community organizations.

Suggested strategies to overcome this issue include the following:

Annually design and/or update and coordinate delivery of a fair housing education program that reaches the public with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint

Ensure targeting to members of the public who are most vulnerable to housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities

Focus efforts on incorporating fair housing education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups

Raise awareness of the County's Fair Housing Hotline by continuing to distribute posters, flyers, and other materials and provide translated versions in other languages as needed