



### **GRANT APPLICATION**

### **Submitted by:**

Cobb County, Georgia

### **Submitted to:**

U.S. Department of Housing and Urban Development (HUD)



Cobb County CDBG Program Office 192 Anderson Street, Suite 150 Marietta, GA 30060



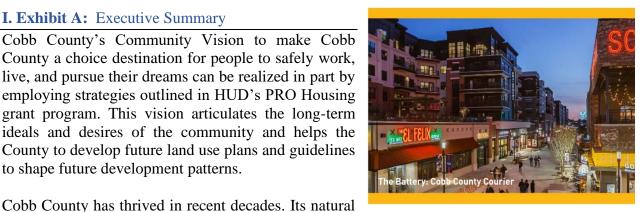
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#### **I. Exhibit A:** Executive Summary

Cobb County's Community Vision to make Cobb County a choice destination for people to safely work, live, and pursue their dreams can be realized in part by employing strategies outlined in HUD's PRO Housing grant program. This vision articulates the long-term ideals and desires of the community and helps the County to develop future land use plans and guidelines to shape future development patterns.



resources, location, economy, schools, and most, importantly, its people, have made Cobb County a desirable place to live, work and play. These attributes have contributed to sustained growth over the past few decades and will continue to attract visitors, residents, and business interests for years to come. As Cobb County continues to flourish, changes are inevitable. As new development and redevelopment emerges, the need to support the development of more housing, preserve existing

housing and remove barriers to housing development is increasingly more important to moving

Cobb towards its vision.

Housing is an essential element of the community and plays a critical role in opportunities for individuals, families, employees, and employers. The mix of housing types, age, condition, tenure, and cost of housing can impact the health and economic prosperity of the community. As the population in Cobb continues to increase along with diversity, and with economic development policies attracting corporate businesses and working to establish small businesses, it is critical to ensure the county is equipped with a balance mix of housing types and price points. Cobb County citizens should have access to housing that is safe, affordable, and suitable for their household and location preferences.

As the proposal will describe in more length, there are various factors contributing to our inadequate housing supply and housing affordability crisis, particularly for low- and moderate income households. These range from housing and rental costs drastically increasing, while salaries are not keeping pace, leading to decreased affordability. For many local residents, this means that they are paying unaffordable rents putting them at higher risk of displacement and decreasing their pathways to homeownership.

In applying for these funds, the County will seek to minimize barriers to affordable housing with a funding request of \$9,500,000 (nine million five hundred thousand) to carry out the following activities:

- Encouraging PRO Housing Development \$4,000,000: To expand the supply of affordable housing by focusing on single family housing by financing the construction or rehabilitation of affordable housing and acquiring or disposing of land or real property for affordable housing.
- Infrastructure Activities to Reduce Housing Costs \$2,000,000: To reduce housing costs by financing utility costs in affordable housing developments by supporting

installation of new or upgrading utilities and/or infrastructure improvements and investing in neighborhood amenities.

■ Preserve Affordable Housing Supply - \$3,500,000 Preserve the supply of dedicated affordable housing units and stabilize existing residents in housing by preventing evictions, creating quality rental opportunities, promoting home buying, offering down-payment and closing cost assistance, and housing counseling.

#### II. Exhibit B: Threshold Requirements and Other Submission Requirements

- ✓ Applicant and Recipient Assurances and Certifications (HUD 424-B)
- ✓ Applicant/Recipient Update/Disclosure Report (HUD 2880)
- ✓ Disclosure of Lobbying Activities (SF-LLL)
- ✓ Certification Regarding Lobbying (Lobbying Form)
- ✓ Federal Assistance Assurances
- ✓ Grant Application Detailed Budget Worksheet (424-CBW)

### **Resolution of Civil Rights Matters**

#### Cobb County's Response:

- (a) Cobb County has not had any of the charges, cause determinations, lawsuits, or letters of findings referenced in subparagraphs (1) (5) that are not resolved to HUD's satisfaction before or on the application deadline date for this NOFO.
- (b) Cobb County does not have any actions to resolve any charge, cause determination, lawsuit, or letter of findings that have been taken before the application deadline date.

**Eligible Applicant:** Cobb County, as a unit of local government (02 City Government), is an eligible applicant.

**Number of Applications:** Cobb County is submitting only one application.

#### **Current Efforts to Support Affordable Housing Production and Preservation**

Cobb County stands as one of the fastest growing counties in the state of Georgia and the broader southeastern region, experiencing substantial growth in both population and employment. It is projected that Cobb County's population will surpass the one-million mark by the year 2050. Notwithstanding this impressive expansion, the County is diligently channeling its resources into bolstering its housing policies and increasing its housing inventory. However, the growth in housing supply has been slow, leading to an upward trend in both housing and rental costs. Furthermore, demographics continue to shift and drive demand.

#### Population Change Forecast 2015 - 2050 Cobb County Census Tracts

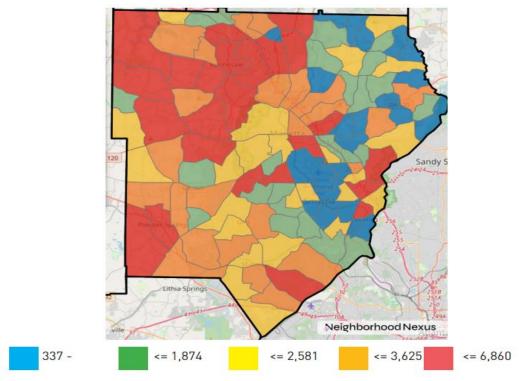


Figure 1: Housing Assessment for Cobb County Report - https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf

Distinguished as one of the five largest counties within the state of Georgia, Cobb County remains committed to a systematic approach in addressing the pressing housing needs of its residents. The County's primary objective is to provide secure, affordable, and appropriate housing options to individuals and families with low-to-moderate incomes, particularly in areas brimming with opportunities. The County thrives on its abundant natural resources, strategic location, robust economy, and educational offerings, rendering it a great locale to live, work, and play. Nevertheless, key barriers persist.

#### **Identifying Barriers**

Cobb County has conducted thorough evaluations of housing needs and housing barriers within our community over the years. Through research and citizen participation, the County revealed several barriers to housing that need attention. The County's 2020 Analysis to Impediments to Fair Housing (AI) identified barriers and defined action steps to tackle them. As a result, the County met annually with municipalities, service providers, and local nonprofits to address these impediments with concrete strategies and actions. The County collaborated with community stakeholders to complete all action steps and further assess new barriers to affordable housing. This collaboration led to numerous accomplishments. For example, to address the identified impediment of lack of fair housing education, the County instituted new initiatives including the establishment of a fair housing hotline and bus advertisements to increase education and outreach. Also, to address the lack of accessibility to public transportation, another identified impediment, the County funded projects that provide transportation services for the elderly, disabled and low-income riders in less centrally located areas.

The County continues to understand evolving housing needs and regularly explores the barriers experienced by residents but especially those most vulnerable. To identify current barriers to affordable housing, Cobb County commissioned two recent housing studies:

- 2022 Cobb County Community Assessment
- 2023 Housing Assessment for Cobb County

Both studies reveal key trends impacting the County and its residents. These include high housing and rental costs, owner and rental cost burden, aging housing stock, an increase in residents age 50 and up, and a lack of housing diversity.

#### 1. High Housing and Rental Costs

Housing and rental costs are drastically increasing, while salaries are not keeping the same trend leading to decreased affordability. Some localities are experiencing a reduction in the stock of units with low rents as owners renovate housing or simply align rents with a rising market. In Cobb County, 1.8% of rental units in 2020 had a monthly rent of \$500 or less, and 19.9% of units rented for \$1,000 or less monthly. Lower income renters may be pushed into higher cost rental units due to a change in the housing stock. In addition, some of the units identified as affordable to people of a particular income level may in fact be occupied by households with higher incomes, reducing the stock available for lower income households. There are deficits in affordable supply for the lowest income households in nearly all markets. An evaluation of the amount of public housing, and housing created with Low-Income Housing Tax Credits, can identify the amount of subsidized housing that exists in Cobb County and in each city, and can lead to preservation efforts.

#### 2. Cost Burden

Cost burden, a term indicating households who spend more than 30% of monthly income on housing and basic utilities, has increased. Cobb County's popularity and increasing population, coupled with increased housing demand, slow wage increases, and lower housing supply are increasing cost-burden on residents at low- and moderate-income levels in all communities. Almost all low-income households earning below \$34,999 in Cobb County are cost burdened, and

the percent of moderate-income cost-burdened households (\$50,000-\$74,999) has increased from 9% in 2010 to over 27% in 2020. These workforce income households are increasingly struggling to pay housing expenses as over 24% of owner-occupied households and 50% of rental households in Cobb County are cost burdened. Cost burden can at a minimum cause families to forgo necessary expenses such as healthcare. At worst, extreme cost burden can push families into homelessness. The incidence of housing cost burdens is generally highest for unassisted renter households with the lowest incomes.

#### Cost Burden by Income and Tenure: Cobb County



Figure 2: Housing Assessment for Cobb County Report - https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf

As housing costs rise, these households struggle to afford housing and may be forced to move further from their places of employment. It should also be noted that renters (44.45%) are much more likely to be housing cost burdened than those living in properties that they own (16.35%). Additionally, the average cost of utility bills can also be a major factor in a household's ability to afford housing. According to the US Energy Information Administration, the average cost of energy in US households is approximately \$1,411.80 per year. Nearly half of this cost is directly associated with heating and cooling. In the state of Georgia, the cost of utilities is somewhat higher than the national average. Research indicates that these costs can be greatly impacted by home insulation (including windows/doors), appliances, thermostat types, and personal habits. The ultimate consequence of a housing cost burden is the loss of housing. Not only does homelessness impact the quality of a person's life, but a lack of housing can impact health and the ability to secure meaningful employment. In the most recently published Point-In-Time (PIT) Count, a total of 871 sheltered homeless individuals were identified in the local service area, which is almost double the number in 2019. Among these, 130 were veterans and 163 were noted as chronic. Cobb CoC conducts an unsheltered count every 2 years, so an unsheltered count was not conducted in 2023.

#### 3. Aging Housing Stock

Older housing may be more "naturally affordable" than new housing stock. However, a 2014 article by Forbes Magazine identified the most common concerns people face when living in older homes. The list included termite infestation, mold/mildew, plumbing and electrical problems, foundation issues, Radon, leaking/sagging roofs, and inadequate insulation around windows. Based on the ACS estimate, in Cobb County it is estimated that at least 59,564 households (20.76%) live in substandard housing units, with approximately 20,239 of these living in homes with severe conditions. A further observation is that renters are more than twice as likely to live in homes with substandard conditions than those in owner occupied residences (17.00%). Among the housing units that were reported as having substandard conditions, nearly half (49.23%) were noted as having at least one severe substandard condition. Among the conditions specifically identified as problem areas, an estimated 1,739 homes in the county were noted as lacking cooking facilities and 657 did not have adequate plumbing. A total of 1,174 households reported having no telephone, which could impact the ability of family members to access medical care and employment opportunities.

Another thing to consider is the aging federally subsidized housing. By 2025, the affordability restrictions on 2,786 units of federally subsidized housing in Cobb County are set to expire. Restrictions on an additional 684 units are set to expire by 2030.

#### 4. Lack of Housing Diversity

A lack of housing diversity revealed in existing stock, new sales versus resales, and permits creates a mismatch between the type of housing needed and availability. Single-family homes (attached and detached) comprise 76% of housing stock. Low supply and lack of housing choices may cause families at lower incomes to be pushed out of the owner-occupancy market and into renting. The large percent of owner-occupied housing across Cobb County at 62% and low vacancy rate for rentals and owner-occupied housing point to a need for rental housing stock, as well as the need for entry-level homes and housing for those who wish to downsize. The lack of housing supply has increased home prices and rental rates, decreasing housing options for young families, young adults, and seniors. The rate of production of housing units in Cobb County has not kept pace with the number of households nor with the growth in population. In areas with a tight housing supply and a larger number of households than units in this comparison, there may be opportunities to improve affordability by developing new studio or one-bedroom units. In addition to being less expensive to develop than larger units, the development of such units could free up larger units by encouraging more one- and two-person households to move out of their larger units and into the smaller ones.

#### Cobb County Housing Units: 2020



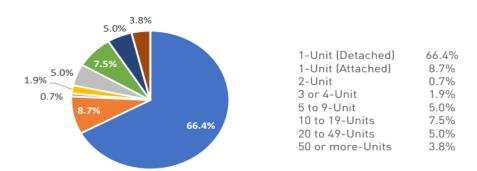


Figure 3: Housing Assessment for Cobb County Report - https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf

#### **Programming and Partnerships**

After thoroughly examining a variety of resources related to housing, the 2020 Analysis of Impediments to Fair Housing Choice (AI) revealed new impediments to fair housing choice, and the County adopted new community planning strategies to mitigate and remove barriers to affordable housing production and preservation. Some of these strategies include the following:

#### Lack of Affordable Housing

The County established the objective to increase the supply of affordable housing by new construction and rehabilitation of various types of housing which is affordable to lower income households. One of the approaches to attain this objective was to continue promoting the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable. Using HOME funds in 2021, the County added five newly constructed single-family homes to its affordable housing stock and provided six homebuyers with Down Payment Assistance (DPA). Additionally, in 2022, the County added three (3) newly constructed single-family homes to its affordable housing stock and provided four (4) homebuyers with Down Payment Assistance (DPA).

#### **Lack of Accessible Housing**

The County set out the goal to increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled. One of the strategies to achieve this goal was to financially assist in improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to remain in their homes. Between 2021 and 2022, a total of \$349,376.34 was expended in the County's Minor Home Repair Grant program to assist 24 low-income households with minor home repairs including improving accessibility.

#### **Barriers Limiting Housing Choice**

The County outlined the aim to eliminate physical, economic, and social barriers in the County and increase housing choices and opportunities for low-income households and members of the protected classes throughout the County. One of the methods to accomplish this aim was to deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas. The County has funded various Habitat for Humanity projects geared toward individuals who are first-time homebuyers living at or below 80% of the area median income. These projects have increased the availability of affordable housing in high opportunity areas.

#### High Housing Costs

The County and its public and private sector partners defined the objective of developing long-term strategies to serve as an ongoing affordable housing vision and set measurable goals for housing production and preservation. County collaborations led to many goals including (1) determine locations for the development of affordable housing and work with local non-profits to acquire land for affordable units and (2) encourage private developers to construct affordable housing. In the most recent HOME funding cycle, the County awarded funding to Cole Street Development Corporation, the County's Community Housing Development Organization (CHDO), to fund acquisition of property for development of affordable senior housing in Cobb County. The developer currently is building an apartment complex in a neighborhood with comparatively high median rents but has included new dedicated affordable rental units.

The key strategies identified in the Cobb County 2040 Comprehensive Plan 5-year update indicates the County's commitment to providing a balanced mix of housing types and price points for residents. This plan includes the Housing Element, which establishes the vision for housing development, redevelopment and affordability, which complements the County's Five-Year Consolidated Plan.

#### **Demand for Affordable Housing and Needs**

Our commitment to addressing housing challenges within our priority geography, which includes the city of Smyrna, as well as the census-designated places of Fair Oaks and Vinings, is unwavering. The pressing issue of housing affordability in Smyrna and the CDPs serves as a testament to the broader challenges faced by these communities. Based on the 2023 Housing Assessment for Cobb County conducted by the Atlanta Regional Commission, Smyrna, with its dynamic demographic landscape, stands out as a pivotal focus area. It exhibits substantial growth in both younger children aged 5-14 and older populations aged 50 and older. Moreover, Smyrna's housing profile reveals critical insights. It has the highest percentage of one-person households at 36%, followed closely by two-person households at 32%. Interestingly, the majority of households consist of one-bedroom units (36%), followed by two-bedroom units (32%). Despite this distribution, studios (2%) and one-bedroom units (12%) make up a smaller portion of the housing stock.

A deeply concerning statistic underscores the gravity of the housing cost burden issue in Smyrna: 100% of low-income families who own housing in Smyrna face cost burdens. Renter households in Smyrna also bear a significant cost burden, surpassing that of owner-occupied households. Both low-income and middle-income renter households experience high levels of cost burden. To

further complicate matters, a substantial portion of Smyrna's housing stock was built prior to 1990, accounting for 55.85% of households. This aging infrastructure poses additional challenges in meeting the diverse housing needs of the community.

#### Change in Owner Cost Burden: Smyrna 2010-2020



#### Change in Renter Cost Burden: Smyrna 2010-2020

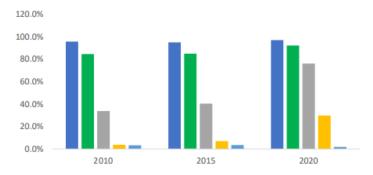


Figure 4: Housing Assessment for Cobb County Report - https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf

In Cobb County, the largest increase in the percentage foreach age group is 55 and above, indicating an increase in the population of seniors in Cobb County. Per the 2040 Comprehensive Plan 5-year update, the senior population in the County is expected to reach a population of 234,922 by 2050. As the number increases, demand for studio and 1-bedroom rental units are growing. Seniors are also likely to be cost burdened. There are an estimated 60,219 individuals residing in 9,194 households that are currently struggling with poverty as defined by the nationally recognized guidelines. Individuals with low incomes face a multitude of barriers preventing them from accessing basic needs. This is especially concerning for low-wage earners or individuals on fixed incomes, as the cost of living in the county is higher than other areas of the state.

#### **Key Barrier to Produce and Preserve Affordable Housing**

As one of the fastest-growing counties in the state, Cobb County requires an increased supply of affordable housing options. However, the accessibility of financing and subsidies for affordable

housing presents an enormous challenge and persists as a key barrier when it comes to the creation and maintenance of affordable housing units. While these financial mechanisms are designed to facilitate the development and preservation of affordable homes, their availability often falls short of the escalating demand. As a result, developers and housing providers grapple with limited resources to establish and sustain affordable housing initiatives. This disparity between the need for subsidies and the resources allocated for them impedes progress in addressing the housing crisis, underscoring the crucial role that increased funding and streamlined subsidy allocation processes can play in improving this pressing issue. In addition, limited access to housing education and other educational opportunities for low to moderate income households further exacerbates the difficulty in creating and maintaining affordable housing units.

#### IV. Exhibit D: Soundness of Approach

#### **Project Vision**

Cobb County's vision articulates longterm ideals and desires where people of all incomes, ages, backgrounds, and abilities have access to and can choose the home and the community to live in that best meets their needs. These housing choices should be in safe, livable neighborhoods and they should provide a sense of connection to the community with convenient access to schools, parks, shopping, amenities, and



jobs. Characteristics that enhance livability, such as walkability, access to transit, low maintenance, and convenient access to goods and services, are becoming more valued by a large segment of the population. In order to establish neighborhoods of choice, a range of housing options should be available to complement community facilities, including the following: schools, parks, community centers and compatible neighborhood-oriented commercial uses that contribute to the neighborhood livability. Finally, safe and sustainable housing served by housing programs, which aid those who live in the community (including the most vulnerable), should be available. This includes services and provisions for low- and moderate-income persons, youth, seniors and the physically disabled.

Cobb County's Housing Element as listed in the 2040 Comprehensive Plan establishes a vision for housing development, redevelopment and affordability. This element is closely related to Cobb's Five-Year Consolidated Plan that is maintained by Cobb's Community Development Block Grant Program (CDBG) Office. If funded, this proposal will ensure that the County can achieve its goals for increasing affordable housing in high opportunity areas as well as the throughout the County overall. The County's PRO Housing activities will ensure that 51% of the produced or preserved units directly benefit low-and moderate-income households, except for certain new construction of housing activities which will have at least 20 percent of the units set-aside for low-and moderate-income households.

The County is submitting this application for PRO Housing funding in hopes of accomplishing its local, regional, and national goals to increase the production of affordable housing, and reverse patterns of residential segregation by race and income. The County's Pro Housing goals are organized to enhance affordable housing strategies, facility affordable housing production and preservation, and increase the supply of housing as follow:

# Goal 1. Implement new construction and rehabilitation activities to preserve affordable housing and prevent displacement with a goal of no net loss of existing affordable rental units.

Housing units built before 1980 reveal the potential for redevelopment or housing stock preservation. Of the six largest housing investment companies - those who own 5,000 or more parcels - these corporate investors own 2.5% of the housing stock in Cobb County. This equates

to approximately 3,188 single-family homes that are rented by these firms. Cobb County has approximately 190,987 single family rentals (SFR). Investors are buying roughly half as many homes as they were in early 2022 (Redfin.com). Solutions to curb the market for investor rentals include building more stock of entry-level housing for ownership, and options to rent in or near more desirable neighborhoods. Cobb County's Priority Geographic includes the City of Smyrna, Fair Oaks, and Vinings. The City of Smyrna has the highest percentage of 1-person households at 36%, followed by 2-person households at 32%. Household data is not available for Fair Oaks and Vinings as they are not designated as local governments only unincorporated areas of Cobb County. The County's anticipated outcome to be achieved by no later than the end of the proposed activity will be 2027 and will assist in mitigating the impact from private and public market investments in Cobb.

#### **Goal 2: Enhance County Infrastructure Investment to Reduce Housing Costs**

The County will seek to enhance activities necessary for affordable housing infrastructure and predevelopment costs to ensure housing is located in priority planning areas with existing infrastructure, transit, and available access to jobs and other community amenities. The County will work with area local governments, non-profit developers, and private developers to support the infrastructure investments. The County's desired outcome will be to increase affordable housing opportunity for low-income residents and ensure improved local community and spark reinvestment. The County's anticipated outcome to be achieved by no later than the end of the proposed activity will be 2027 and will address decades of underinvestment in neighborhood amenities, infrastructure and services.

### Goal 3. Increase the supply of housing that is affordable to low-and moderate-income households, particularly in areas that have historically lacked such housing.

As housing costs rise, these households struggle to afford housing and may be forced to move further from their places of employment. The gap between wages and housing increases the burden on city governments and schools to retain employees vital to the functioning of the schools and city services. Soaring housing costs led to a substantial rise in housing cost burdens for the first time in 10 years. More than 1 in 7 households paid over half their income for housing. Record housing shortages are a fundamental driver of our affordability challenges. Years of underbuilding have led to an all-time shortage of for-sale homes as well as too few affordable rentals. The County will address and increase housing stability for low-income renters by developing and maintaining its tenant-based rental assistance model as currently established under the HOME Investment Partnerships Act Program. The County's anticipated outcome to be achieved by no later than the end of the proposed activity will be 2027 and will create long-term economic opportunities.

#### **PRO Housing Proposed Activities**

Cobb County requests \$9.5 million through the Pathways to Removing Obstacles to Housing (PRO Housing) grant program to establish a program to address critical housing shortages in the County. This new grant program would address planning and policy activities, development of new housing, preservation of existing housing, and infrastructure activities to support housing. Cobb County has identified the following activities to undertake, should the County be selected as a PRO Housing grant recipient.

#### Activity 1: Encouraging PRO Housing Development

Cobb County will expand the supply of affordable housing by focusing on single family housing and rental housing since these housing types are more are generally more affordable than single-family homes, largely because their smaller size means lower per-unit construction and land costs. Beyond the price points of the homes themselves, developing missing middle housing in place of single-family homes can help Cobb County to expand its overall housing supply – a critical strategy for alleviating price pressures across the housing market more broadly. The County intends to focus expand capital resources by creating and attracting new financing mechanisms, implementing tax or bond financing mechanisms, reusing land and buildings, and leveraging public land by:

- A. Financing the construction or rehabilitation of affordable housing
- B. Acquiring or disposing of land or real property for the development of affordable housing

#### Activity 2: Infrastructure Activities to Reduce Housing Costs

Cobb County will reduce housing costs by financing utility costs in affordable housing developments. These activities will be taken under consideration by reducing development costs and barriers, implementing community development strategies, and expanding transit options:

- A. Installing new utilities and/or infrastructure improvements necessary for the development or preservation of affordable housing
- B. Upgrading existing utilities or improvements to increase an area's overall capacity for new housing
- C. Investing in neighborhood amenities that benefit low-and-moderate income residents such as parks, community centers, bike lanes and improvements to the physical environment that increase public safety such as streetlights or sidewalks

#### Activity 3: Preserve Affordable Housing Supply

Cobb County will preserve a supply of dedicated affordable housing units that come with legal restrictions ensuring they remain affordable to low- or moderate-income households by stabilizing existing residents in housing by preventing evictions, creating quality rental opportunities, promoting home buying, offering down-payment and closing cost assistance, and housing counseling by:

- A. Acquisition or subsidization of at-risk housing for the purpose of preserving affordability
- B. Providing homebuyer education, assistance, appraisal programs, and other educational programs for LMI residents

#### **Addressing Key Barriers**

The key barriers identified directly connect with the proposed activities. To tackle the barrier of limited financing and subsidies, Cobb County intends to expand the supply of affordable housing. This includes financing the construction or rehabilitation of affordable housing and acquiring or disposing of land for such development. These steps align with addressing the financial constraints that hinder affordable housing initiatives. To preserve affordability, the acquisition and subsidization of at-risk housing directly confronts the challenge of limited housing subsidies, ensuring that affordable housing units remain available.

Additionally, financing utility costs in affordable housing developments will help mitigate the financial burden on low-and-moderate income residents. By reducing development costs and investing in neighborhood amenities that benefit these communities, the County is working to overcome the obstacle of unaffordable housing costs. To further address the key barriers, including the absence of housing education programs, Cobb County will provide homebuyer education, assistance, and other educational initiatives for low and moderate-income residents. These educational programs aim to empower residents with the knowledge and resources necessary to secure and maintain affordable housing.

#### **Alignment with Existing Planning Initiatives**

The proposal aligns with several recent planning initiatives conducted by the County and takes in consideration those recommendations to further housing goals. The following initiatives align with this proposal:

- The Cobb County Housing Assessment Report
- CobbForward Transit Plan
- 2040 Comprehensive Plan
- 2021-2025 Consolidated Plan

This proposal is flexible enough to accommodate moderate shifts in population. Population stats are updated at least every five (5) years and when carefully considered when activities are selected. Activities undertaken in this proposal will prioritize transit-oriented development as recommended in the CobbForward Transportation Plan. The county assesses all projects and their proximity to public transportation and does not intend to displace any residents long-term or otherwise with transit-oriented development. The plan seeks to preserve affordable housing in transit-oriented districts. Additionally, the plan seeks to coordinate processes across the jurisdictions (City/County) to ensure ease of use and a reduction in barriers to addressing housing issues. Each activity will be assessed on its ability to allow for high community assets including access to public transportation, jobs, public services, grocery stores, etc.

#### **Lessons from Similar Efforts**

Under Cobb County's Home Investment Partnerships (HOME) program, the County has addressed affordable housing initiatives through the acquisition of rental housing, acquisition, and new construction of single-family homes, tenant-based rental assistance, and down-payment assistance. During 2022, the County expended a total of \$1,438,388,27 in HOME funds of which a total of

262 Cobb County residents were assisted through the Tenant Based Rental Assistance (TBRA) Program. Additionally, the County added three (3) newly constructed single-family homes to its affordable housing stock and provided four (4) homebuyers with Down Payment Assistance (DPA).

One of the lessons learned through the administration of these affordable housing activities is that the County should consider allocating a larger subsidy to assist potential homebuyers to make the purchase of homes more affordable and sustainable. Additionally, the County could implement more innovative strategies to tackle housing affordability in the County by combining new construction builds with providing down payment assistance or first month's rent to low-income buyers and renters.

#### Geographic Scope

Cobb County is comprised on seven cities and several communities. The PRO Housing Priority Geography Map revealed that one city (Smyrna) and two communities (Fair Oaks and Vinings) were identified as priority areas that meet the HUD definition of "priority geography" for this funding opportunity, as listed in Figure 5. Smyrna is the third largest city in the County is listed as a geographic priority area along with Fair Oaks and Vinings, which are communities just outside of Smyrna. The County will focus grant resources in these priority geographic areas to address the insufficient amount of affordable housing units for the population growth in these areas. The surrounding neighborhoods will benefit from increased access to affordable housing opportunities and residents with lower incomes who experience higher rates of housing instability will attain housing stability. The current housing market in the County makes low-income households particularly vulnerable to displacement and/or homelessness unless the County takes proactive steps to ensure access to opportunity in conjunction with meeting housing needs in surrounding neighborhoods.

Affordable housing not keeping pace, is measured as (change in population 2019-2009 divided by 2009 population) – (change in number of units affordable and available to households at 80% of the HUD Area Median Family Income (HAMFI), 2019-2009 divided by units affordable and available at 80% HAMFI, 2009).

#### Pro Housing Priority Geography Search

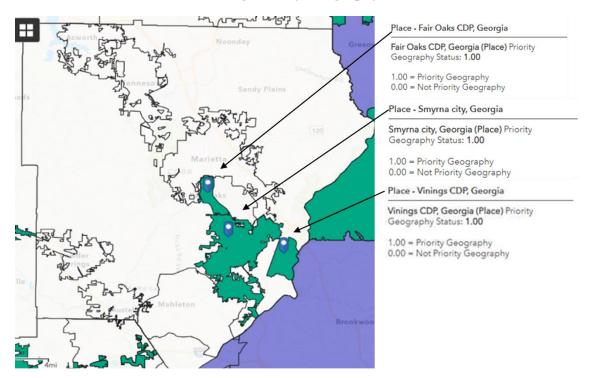


Figure 5: Source: https://hudgis-hud.opendata.arcgis.com/apps/HUD::prohousing-priority-geography-search/explore

The work performed in these high priority areas will serve as a framework to be replicated in programs and strategies throughout the County. When using PRO Housing funds in non-priority areas, the County will consider the pace in which population and housing inventory has changed over time. The following tables depicts the widest gap between population growth and growth in the number of housing units and households from 2010 to 2020 in Marietta, Smyrna, and Acworth. The remaining municipalities are Mableton, Powder Springs, Kennesaw, and Austell, with the latter two showing population growth and housing production on pace with one another.

Figure 6: Population, HH, Housing Units Smyrna, 2010 – 2020

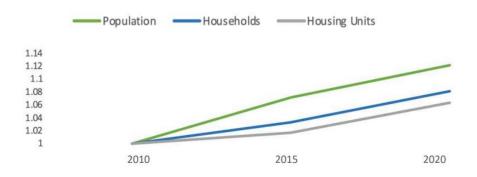


Figure 7: Population, HH, Housing Units, Marietta, 2010-2020

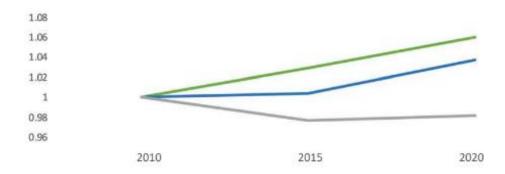
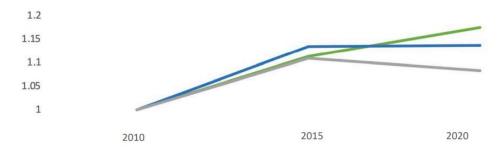


Figure 8:Population, HH, Housing Units Acworth, 2010 – 2020



Source: Housing Assessment for Cobb County Report https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf

Seven different housing submarkets were identified in the County's Housing Assessment<sup>1</sup> and the following map and table depicts the various market location and description and the strategies to be employed in each of those areas. As shown in the Map, the City of Smyrna has five submarkets (1, 2, 3, 5, 6), Vinings has two submarkets (5 and 6), and Fair Oaks has one submarket (4). For

<sup>&</sup>lt;sup>1</sup> Housing Assessment for Cobb County Report - <a href="https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf">https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf</a>

example, since Fair Oaks only has one submarket that has lower-priced core neighborhoods that are vulnerable to increasing housing costs, the County will employ strategies in this area to preserve affordable housing supply by (1) providing financial incentives to developers, (2) developing new policy incentives to stabilize this area, and (3) coordinating across agencies and other governments to ensure preservation needs are met.

#### Cobb County Housing Submarkets

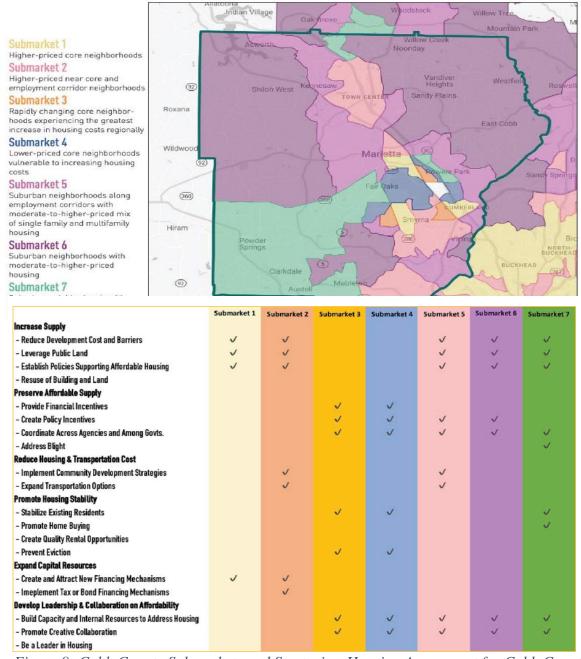


Figure 9: Cobb County Submarkets and Strategies, Housing Assessment for Cobb County Report - https://s3.amazonaws.com/cobbcounty.org.if-us-east-1/s3fs-public/2023-04/Cobb%20County%20Housing%20Assessment%20Report%20Final-r.pdf

#### **Stakeholder Engagement**

Cobb County greatly values the input of its citizens and community stakeholders. Therefore, stakeholder and community engagement played an important role in guiding the PRO Housing application process - from the initial visioning and development of goals to the determination of needs and the vetting of draft recommendations. The County spoke directly with developers, builders, and general contractors in shaping this proposal for PRO Housing funds. Cobb County consulted with citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care in preparing this proposal. The County held meetings with internal County departments including the County Manager's Office and the Board of Commissioners, Finance Department, and Community Development to gather input about housing barriers prior to the development of this proposal.

Cobb County has an existing network of affordable housing developers and contractors that regularly work to expand affordable housing options in the County including rehabilitation projects. The stakeholder network offered that preserving existing housing is a must and developing incentives for new developers is essential for closing the housing gap that exists in the market. Feedback from developers and contractors coupled with research from various housing and community related studies helped to shape the activities outlined in this proposal. The County used data collected from stakeholders, to determine specific strategies and activities the County would undertake through the PRO Housing grant program. Based on the needs and strategies identified, the County then consulted with recommendations from the recent Housing Assessment study to assign specific strategies in priority areas in the County.

Cobb County encouraged public participation by using proven citizen engagement strategies to ensure that community members are consulted prior to undertaking activities and that the County gains support for the project. This included those likely to be affected by the proposed activity such as persons with unmet housing needs, residents of public and other affordable housing units, and persons from all protected class groups under Fair Housing Act. Additionally, the County leveraged its extensive list of stakeholders by sending direct emails to garner needed input through a brief survey allowing stakeholders to select and rank the barriers to affordable housing in the County. Within the survey, stakeholders were also given an opportunity to openly express any feedback, suggestions, or comments concerning affordable housing. The County held an in-person meeting to offer an opportunity for community members to ask in-depth questions and gain a deeper understanding of the grant and/or the application.

Since the County is subject to Consolidated Plan requirements and strictly adheres to the requirements under 24 CFR part 91, the engagement strategies employed for this proposal are consistent with the County's standard practices. These same methods will be continued in the future, especially when new activities are introduced. This commitment extends to the County's established practice of publishing and posting notices in the County's newspaper and in media outlets directed at marginalized communities, including the LGBTQ+ and Limited English Proficiency populations within Cobb County.

#### **Alignment with Affirmatively Furthering Fair Housing**

Cobb County will employ a multi-pronged approach to remove barriers to affordable housing in well-resourced areas of opportunity by taking the following actions to increase access of underserved minority groups:

- Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- Support and promote the development of affordable housing in areas of opportunity where minority and low-income persons and families may wish to reside.
- Promote and support the development of affordable housing for minorities and low-income households who are being "forced out" of their homes and may not have housing resources to relocate.
- Support and promote sound planning principals and revise land development and zoning ordinances to eliminate "exclusionary zoning," which restricts the development of affordable housing.

Cobb County will also employ a multi-pronged approach to remove barriers impeding the development of affordable housing and would promote desegregation by taking the following actions to increase access of underserved minority groups:

- Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- Support and promote sound planning principals and revise land development and zoning ordinances to eliminate "exclusionary zoning," which restricts the development of affordable housing.

#### Reducing Affordable Housing Concentration in Low Opportunity Areas and Desegregation

The County will assess each project against an assessment tool that encourages development in well-resourced areas of opportunity, desegregation, and the deconcentrating of affordable housing on six goals. The County will assess each potential project and score it on its ability to meet the following the following goals:

- A. Increase access to affordable housing in high opportunity areas (at or below 20% poverty rate). Projects with lower poverty rates receive higher points.
- B. Prevents the loss of existing affordable housing stock and increases the supply of new affordable housing in high opportunity areas. More points are awarded to projects that incorporate mixed income bands.
- C. Increase the supply of accessible, affordable housing for persons with disabilities.

- D. Make investments in targeted neighborhoods and segregated neighborhoods to increase opportunity while protecting residents from displacement.
- E. Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing
- F. Increases access to information and resources on fair and affordable housing

#### **Addressing Unique Housing Needs of Members of Protected Classes**

Cobb County will assess demographic data of each activity to determine specific strategies to employ in meeting the unique housing needs of members of the protected groups including persons with disabilities, families with children, and underserved communities of color. For example, in communities of color, the County may employ housing subsidies, housing counseling, credit counseling since these communities traditionally lag in credit worthiness. As outlined in the most recent Analysis of Impediments, the proposal seeks to address the unique needs of persons with disabilities specifically and underserved communities of color.

#### **Displacement**

The County will not seek to develop projects that displaces residents. This is a standard practice in the County's other housing programs and the County intends to continue this practice with PRO Housing funds.

#### Addressing Issues Identified in Fair Housing Plan

The County has diligently continued to affirmatively further fair housing in the administration of program funds by funding activities to enhance fair housing education. In the 2021-2025 Analysis of Impediment (AI), the County identified four impediments and goals and strategies to address each impediment. The PRO Housing proposed plan is directly aligned to the County's fair housing plan by addressing the AI's goal to increase the supply of affordable housing by new construction or rehabilitation.

#### **Addressing the Needs of Disabled Persons**

The County will assess housing activities to ensure they are inclusive to disabled individuals and ADA compliant. The County will encourage developers to use universal design elements to increase the overall supply of housing that is accessible to residents with disabilities. The County will seek housing developments that support independent living, transportation, and other supportive services to maintain independence in housing. Preference will be given to developments that proposes supports and services to maintain and/or improve the quality of supported housing. Includes significant provision of services and amenities to meet specific needs of residents, like transportation in an area with no transit options, job skill training, and educational support. Includes 7 or more amenities, including major amenities like transportation (if the project is not located within ½ of a mile from transit).

#### **Implementation and/or Enforcement Plan**

Implementation of proposed activities will involve community and stakeholder engagement throughout all phases of project planning and implementation, which will be critical to minimize

delays and barriers posed by litigation, environmental review, and regulatory/permitting processes, including design review.

The County will account for the possibility of public pushback by incorporating significant public engagement as well as considering best practices and lessons learned from similar past efforts conducted by the County and other jurisdictions. Although significant environmental review barriers are not anticipated, the County will address any issues and implement mitigation plans related to federal environmental regulations and laws. Additionally, the County's Attorney's Office will review funding recommendations and address any possible litigation that may arise.

#### **Public Input**

This project is an extension of Cobb County's 2021-2025 AI, which had an extensive community engagement process involving stakeholders. The process included interviews, public meetings, focus groups, a series of facilitated workshops throughout the County on housing, equity and race, and surveys. Stakeholders identified the top barriers to fair housing as lack of affordability, lack of housing stock, lack of accessible housing units, planning and zoning regulations, and physical, economic, and social barriers that limit housing choices. This proposal seeks to address these priorities.

To solicit public input on this proposal, a 15-day public comment period commenced on Wednesday, October 11, 2023, and concluded on Thursday, October 26, 2023. A public notice, with a link to the draft of the PRO Housing Grant Application, was sent out via email, published in local newspapers/news sites, and placed on the County's website at www.cobbcounty.org/cdbg. During the comment period, a public review meeting was held on Monday, October 23, 2023. Additionally, the County administered a survey via SurveyMonkey to solicit feedback from community stakeholders.

#### Engaging and supporting Minority, Women, and Veteran-Owned Businesses

Cobb County intends to engage and support minority, women, and veteran-owned businesses in its proposed housing production process by building the scale of small developers including women, minority, and veteran-owned businesses. The County will offer technical assistance from planning and permitting offices to help these developers navigate the regulatory process; provide user-friendly guides and resources to help developers understand relevant requirements; and work with small business development agencies to connect developers with financing and additional training opportunities.

#### **Promoting Housing Equity**

Cobb County citizens should have access to housing that is safe, affordable, and suitable for their household and location preferences. These housing choices should be in safe, livable neighborhoods and they should provide a sense of connection to the community with convenient access to schools, parks, shopping, amenities, and jobs. The County will solicit proposals from qualified developers and nonprofits to carry out housing activities. Proposals that include development of new housing, preservation of existing housing, and infrastructure activities to support housing, and activities that propose a variety of housing types such as the missing middle housing will be prioritized. This will help to negate any concentration of affordability, expand housing supply, and increase diversity of available housing types.

#### **Tracking Progress**

Cobb County will implement a tracking system tool and annual reporting that will evaluate the effectiveness of proposed activities to advance racial equity in housing. These systems will not only be used to evaluate affordable housing initiatives, but it will also be accessible to county residents, businesses, organizations, and other interested parties to keep them informed of the County's progress towards housing accessibility. If there are gaps in service with any of the projects, the County will create a plan to ensure the projects address equity in housing.

#### **Affirmatively Marketing Benefits**

In accordance with Cobb County's PY2021-PY2025 Affirmative Marking Procedures, the County is committed to non-discrimination and equal opportunity in housing. The affirmative marketing procedures will consist of actions to provide information to otherwise eligible persons from all racial, ethnic and gender groups in the housing market area for housing units purchased, constructed, or rehabilitated under the PRO Housing activities. Cobb County will periodically assess their affirmative marketing program to determine the success of affirmative marketing actions and make any necessary corrective actions. The assessment of the Affirmative Marketing Procedures will occur at least annually as the County evaluates its housing programs as a part of the preparation of the Consolidated Annual Performance and Evaluation Report [CAPER].

The County will inform the general public by placing news releases in various local newspapers, providing informational flyers and other marketing materials, and making verbal presentations to potential homeowners, tenants, and owners of rental properties, and agencies. Additionally, the County will inform social service agencies that assist lower income families and individuals about housing availability. An equal housing logo or phrase will be used in all informational materials, and all materials will be translated to Spanish.

#### **Budget and Timeline**

PRO Housing Grant Budget									
Activity Number	Activity	<b>Estimated Cost</b>	% of Total Cost						
1	Construction	\$3,900,000.00	42%						
2	Infrastructure Improvements	\$1,750,000.00	18%						
3 Preservation of Affordable Housing		\$3,350,000.00	35%						
4	Consultants	\$500,000.00	5%						
	Total	\$9,500,000.00	100%						

	Task	2024			2025			2026			2027						
Task	Descriptions	Jan - Mar Q1	Apr - Jun Q2	Jul - Sept Q3	Oct - Dec Q4	Jan - Mar Q1	Apr - Jun Q2	Jul - Sept Q3	Oct - Dec Q4	Jan - Mar Q1	Apr - Jun Q2	Jul - Sept Q3	Oct - Dec Q4	Jan - Mar Q1	Apr - Jun Q2	Jul - Sept Q3	Oct - Dec Q4
Policy	New Policy Development																
Development/ Program Planning	PRO Housing Implementation																
	Pre-development (survey, design, etc.)																
Initiating	Construction of infrastructure																
Preservation, infrastructure,	Request for Proposal  Developer Selection																
and Affordable Housing Projects	Capacity Building of Nonprofit Developer																
	Construction of Affordable Housing Units																
Monitoring/ Compliance	Compliance																
Metrics	Monitoring																

#### **Minimum Award**

The minimum award which would allow the County to carry out its proposal is \$4,750,000.00 (four hundred million seven hundred and fifty thousand). With this amount, Cobb County would use economies and scale the number of units constructed or rehabilitated to make an impact in the community using innovative development financing strategies. Our minimum is 50% of our original proposed amount.

#### Lead Agency and Staffing Plan

Cobb County is the lead entity, and the County will partner with WFN Consulting, a program management consulting firm that specializes in HUD grant programs, to implement, administer, and manage proposed PRO Housing activities. The Cobb County CDBG Program Office is fully staffed and managed by WFN Consulting and has managed all facets of Cobb County's HUD grant programs since 1981. The Cobb County CDBG Program Office currently provides full-time grant administration for Cobb County.

**Project Management, Quality Assurance, Financial and Procurement and Internal Control Capacity.** The Cobb County CDBG Program Office manages the programmatic and financial oversight grant administration and management of HUD, DOJ, DHS, and FEMA funds awarded to Cobb County and is responsible for planning, implementation, and management of day-to-day operations for these grant programs. The Office provides oversight on allocating grant funds, managing the expenditure of funds and project schedules, monitoring subrecipients to ensure compliance, and providing technical assistance to funded organizations in areas such community and housing development as well as homelessness assistance programs.

Administrative support and oversight of the Cobb County CDBG Program Office is provided by Cobb County's Finance Department and Budget and Internal Audit Division, and the Offices will continue to collaborate on all financial matters, internal controls, and processes for the PRO Housing projects. The Cobb CDBG Program Office already has accounting and grants management systems implemented to manage multiple federal grant programs. The necessary financial controls are in place to account for and properly manage the Housing PRO funds. These systems meet all Federal and State requirements.

Additionally, the Cobb County CDBG Program Office has existing policies and procedures that outline the financial management requirements including, but not limited to, applicable regulations and requirements, financial accountability and records, authorized approval for payments, requests for payment, bank accounts, administrative costs, and audit requirements. The organizational structure of the Office includes risk management measures that establish clear lines of authority and approval, segregation of duties, and secure access to financial records.

Leadership Capacity and Legal Authority. The Cobb County Board of Commissioners (BOC), comprised of five (5) members of which four (4) members are known as commissioners and one (1) is known as Commission Chair, is the duly authorized legal governing authority of Cobb County and as such shall exercise the powers, duties and responsibilities vested in and imposed upon said officers. The Cobb County CDBG Program Office seeks the approval of all proposed funding allocations and draft documents from the Cobb County BOC prior to implementation of grant funded projects.

**Roles of Partners**. Cobb County will partner with its current contractor, WFN Consulting and its staffed CDBG Program Office, to fully implement, administer, and manage proposed PRO

Housing activities. An extension of WFN Consulting's current contract will be sought if this application for PRO Housing funding is approved. WFN Consulting has provided similar services for other local jurisdictions throughout Metro Atlanta, such as Gwinnett County and Clayton County. One of the major features of WFN Consulting's philosophy is the dedication to program integration and simplification, resulting in a streamlined approach to program administration and a cost-conscious management process. WFN Consulting have been entrusted to manage more than \$779 million in federal grant funds, which has included the development of numerous planning documents for the successful management and administration of CDBG, HOME, ESG, and other Federal income-based programs.

Experience Coordinating Partners and Experience in Similar Projects. Cobb County has been the recipient of federal grant funding for over 40 years and has contracted WFN Consulting to provide full grant administration of the CDBG, HOME, ESG, CSBG, JAG, and EFSP grants. Locally, Cobb County has ongoing partnerships with organizations such as the Atlanta Regional Commission, the Chattahoochee River National Recreation Area, and other local nonprofit agencies to provide services to sustain the community.

During the development of the Cobb County Consolidated Plan, the County launched a collaborative effort to consult with elected officials, City departments, community stakeholders, and beneficiaries of entitlement programs to inform and develop the priorities and strategies contained within the five-year Consolidated Plan.

The County's outreach and consultation strategies included the formation of community outreach partnerships with housing, service, and mental health providers; workforce developers; community advocates; and others. Stakeholder meetings were conducted to solicit input from the community at large. Results of the community forums and surveys were reported in the Consolidated Plan. Each segment of the community outreach and planning process was transparent to ensure the Public knew their input was being collected, reviewed, and considered. As part of the effort to implement the policies, programs and projects identified in the Consolidated Plan, the County works collaboratively with staff from the housing, social services agencies, and other entities to develop housing and homeless priorities and strategies that will be addressed by HUD programs. For Program Year 2023, Cobb County received and allocated federal funding to nonprofits for the following grants: CDBG (\$3,365,472.00), HOME (\$1,605,088.00), and ESG (\$277,436).

**Proposal Authorship.** The Cobb County CDBG Program Office researched and prepared the PRO Housing application, which provides a comprehensive strategy to address the County's housing and community development needs.

Staff involved in the preparation of this application, include the following:
Kimberly Roberts, Managing Director, Cobb County CDBG Program Office
Rabihah Walker-Towers, Deputy Director, Cobb County CDBG Program Office
Christianna Jackson, Planning and Compliance Specialist, Cobb County CDBG Program Office
Eryca Fambro, Director of Consulting, WFN Consulting

LaShondra Wells, Project Consultant, WFN Consulting

**Experience with Civil Rights and Fair Housing Issues.** Cobb County, as an entitlement community under the U.S. Department of Housing and Urban Development (HUD), is required to annually submit certification of Affirmatively Furthering Fair Housing (AFFH). This certification has three elements and requires that the County:

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

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

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

The following are the identified impediments based on the assessment conducted throughout the 2020 Analysis of Impediments to Fair Housing Choice process:

#### Impediment 1: Lack of Affordable Housing

There is a lack of affordable housing in the Cobb County due to the County's population growth and influx of higher priced housing construction. This has created a high demand on a limited affordable housing supply, and a corresponding increase in the cost of rental and sales housing.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing which is affordable to lower income households.

#### Impediment 2: Lack of Accessible Housing

There is a lack of accessible housing in Cobb County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in the County and the desire of disabled persons who want to live independently. Interviews indicated that all accessible housing is occupied, and the County's disabled population is growing.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

#### Impediment 3: Barriers Limiting Housing Choice

There are physical, economic, and social barriers (including older inaccessible housing, credit requirements that prevent all residents from obtaining mortgages, and concentrations of poverty and racial or ethnic minorities) in Cobb County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

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

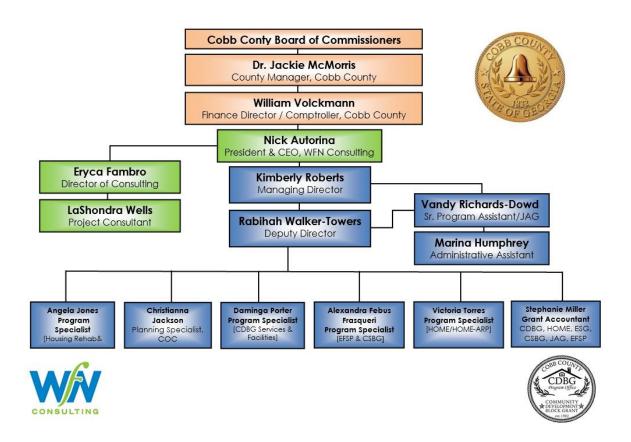
Goal: Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discrimination laws, and regulations, so that the residents in Cobb County can Affirmatively Further Fair Housing (AFFH) and eliminate the negative attitude of "Not In My Back Yard" (NIMBYism).

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

- Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending is not taking place.
- Publish and distribute housing information and applications in both English and Spanish to address the increase in Limited English Proficiency residents in Cobb County.
- Educate residents and local officials to eliminate neighborhood misconceptions and combat "NIMBYism."

**Organizational Chart.** WFN Consulting employs a total 13 team members and has identified six (6) staff members who will participate in carrying out PRO Housing activities. Key personnel identified to administer and implement PRO Housing activities bring over 70 years of combined experience in research analysis, grant administration, and planning expertise. All proposed personnel have experience in completing HUD-related documents for WFN clients, including experience with Consolidated Plans, Annual Action Plans, AIs, and managing CDBG, HOME, ESG, and other federal grant programs. WFN does not intend to use any subcontractors to carry out the proposed PRO Housing activities.

Kimberly Roberts will serve as the project manager for PRO Housing activities ensuring that tasks related to research, community engagement, and administration are handled timely and efficiently.



#### VI. Exhibit F: Leverage

Leveraging funding sources is a critical component of building affordable housing. Leveraging HUD funding allows the County to bring in local, state, and other sources to combine with federal financial resources to maximize the reach and impact of the County's HUD-funded programs. The County's strategy is to work with developers and encourage them to maximize funding sources to build affordable units with lower rental rates. This will require utilizing CDBG and HOME funds, Private Activity Bonds, Low-Income Housing Tax Credits, as well as seeking out other funding sources from local, state, and federal entities. Collaboration will be key to adding new affordable housing units in Cobb County.

Cobb County has a strong and consistent history of securing and leveraging public and private funding in support of programs for low and moderate-income households. The County anticipates utilizing federal grant program funds to include the Community Development Block Grant and the HOME Investments Partnership Act and private funding as a leverage to support the proposed affordable housing development and infrastructure activities undertaken with Pro Housing funds awarded to the County. Cobb County's HOME program has leveraged over \$19,485,119.00 in other funds that was combined with HOME funds to accomplish affordable housing activities. The County has approximately leveraged \$10.66 for every \$1 provided through the HOME Program allocation.

The County also generated over \$500,000 in other leverage funding for its CDBG Program for infrastructure improvements and investing in neighborhood amenities that benefit low-and-moderate income residents. Although the CDBG program does not require matching funds, CDBG funds are currently leveraged through various private and public sources for CDBG projects providing residents with essential support to obtain self-sufficiency.

Cobb County will continue to collaborate with public and private partners to stretch grant dollars further. Federal funds will be leveraged using gap financing for affordable housing development from private lenders, sponsorship contributions from individuals, churches, clubs, and businesses; local public housing authority funding; in-kind donations; and private donations. The County anticipates receiving the following financial resources to be used as a leverage for the Pro Housing grant for affordable housing development:

- HOME Investment Partnerships Program (HOME) Award: Up to \$1.4 Million
- Community Development Block Grant (CDBG) Award: Up to \$3.1 Million
- 4% or 9% Low Income Housing Tax Credit (LIHTC) for new construction of affordable housing up to \$2.5 million

In total, the County will invest more than \$7 million in affordable housing resources. These additional funds will increase the effectiveness on the County's proposed Pro Housing grant activities.

#### VII. Exhibit G: Long Term Effect

**Deliverables and Completed Projects.** The County's deliverables for this project includes establishing permanent affordable housing in a high-opportunity areas. In addition, the project will seek to create and provide secure, affordable, and appropriate housing for individuals and families in Cobb County with low-to-moderate incomes. The proposed project will provide financing for new construction or rehabilitation of additional affordable housing units and the acquisition of land or real property for construction.

Cobb County will also improve infrastructure in existing, primary, and surrounding sites of the affordable housing projects by installing or upgrading utilities and broadband infrastructure to aid in the efforts of preserving existing affordable housing and increasing the area's capacity to develop new housing structures. Additional amenities such as parks, community centers, bike lanes and improvements to the physical environment that increase public safety such as streetlights or sidewalks are requirements for any project under this proposal. This will create long-term amenities that will increase the overall value and appearance of the community. The County will also seek to provide homebuyer education, assistance, appraisal programs, and other educational programs for LMI residents to educate on the importance of maintenance and upkeep to ensure longevity of the structures. Thus, we expect to increase the availability of affordable housing in the County and decrease housing development costs.

**Potential Roadblocks.** Housing is a complex issue. A lack of housing at accessible levels for different incomes and stages of life impacts everything from access for local workforce, to commuter and local traffic, to the vibrancy of commercial districts and neighborhoods in each community and in the region as a whole. The County anticipates some roadblocks to achieving its affordable housing outcomes which may include:

Limited diversity of current housing stock. Cobb County current housing stock is predominately single-family homes in most of the cities and in Cobb County as a whole. Single-family detached homes comprise 67% of housing stock in Cobb County. The County's Pro Housing activities will seek to ensure a mix of housing types, age, condition, tenure, and cost of housing with the long-term goal of establishing a balanced mix of housing types and price points.

Low rental unit vacancy. As of 2020, the vacancy rate for rental units alone was 5.1%, which is lower than the state of Georgia and lower than the Metro Atlanta area. In August 2022, Cobb County had 1.5 months of supply. A six-month supply is desirable to enable in-migration of new residents and to keep rental rates from rising excessively. Low vacancy can be an indicator of low supply. Younger age groups are the highest percent of renters, indicating a lack of opportunity for first-time homebuyers. The County will utilize Pro Housing grant funds to increase rental housing stock, as well as address the need for entry-level homes and housing for those who wish to downsize.

Increasing gap between median household income, home values, and median gross rents. Low supply and lack of housing choices may cause families at lower incomes to be pushed out of the owner-occupancy market and into renting. Older residents and younger residents lack choices for downsizing and for purchasing a home as a first-time buyer. Options for an owner to obtain rental income, or the availability of smaller units, may be needed. The gap between rents and incomes grew to 10%, and the gap between home values and income grew to 6.5% in 2020. The County will utilize Pro Housing grant funds to create rental opportunities for household with a variety of housing needs and incomes.

**Reduced Cost Burden and Value of Siting.** The County's goal for this proposal is to reduce housing cost burdens for residents without increasing other costs, such as transportation cost. Housing cost burden is a key metric in local housing planning, and reducing it is a critical marker of success in addressing the housing crisis. Cobb County's Consolidated Plan includes housing strategies to reduce housing cost burden for renters and owners.

All proposed projects within the proposal will have an extensive application and evaluation process for developers to identify key amenities, public services, jobs, transit, schools, and other important community assets and locations and what value affordable housing and mixed-use residential structures can bring to the community. The overall goal is to add value to the community while providing decent and affordable living for low to moderate income residents in Cobb County.

**Model for Other Communities.** The housing affordability crisis is not exclusive to Cobb County, but all of Metro Atlanta as well is experiencing a dire housing need. Arguably the nation's principal housing challenge is that of affordability. Additional funding to address housing inequality for the County and significantly impact opportunities to lessen the burden of affordability. Cobb leaderships understand that development is necessary, and this project will allow the County to increase housing diversity and housing choice to provide options for new owners, new renters, and existing homeowners must be intentional when growth occurs.

**Environmental Risk.** Cobb County does not have any isolated environmental risks. Cobb County is located in the central part of Georgia. Increased natural hazard risks associated with climate change that the County is susceptible to include hurricanes, tornados, flooding, temperature extremes – particularly heat, and droughts. All projects outlined in the proposal will be subject to a complete environmental review or assessment if applicable to efficiently promote community resilience.

**Measures of Success.** Success at the end of the period of performance or beyond will be measured by the outcome in comparison to the scope of work, defined, budget, and project specifications. Cobb County would like to see a functional affordable housing project that will be a staple in the community for many years to come. In the immediate future, overcrowding and displacement will be reduced as a result of new developments and preservation of current units. We hope to levelized median home values and prices as it relates to AMI and free up available residential parcels that may have been previously restricted or redlined through private bureaucracy.

#### Long Term Effect of Proposal to Remove Barriers to Affordable Housing Production

The proposal will continue to work towards removing structural barriers to low-income households and minority communities, which are the most vulnerable hit hardest and the most vulnerable. These households are required to spend more than half their income on housing. This proposal will address barriers to financing and build affordable housing which is critical to ensuring the crisis doesn't impact those that are most vulnerable most vulnerable to economic shocks. Collaborating with private lenders to educate on the low risks associated with affordable housing developments if they can provide favorable financial terms that include lower interest rates and funding flexibility. Additionally, the County's activities to expand housing opportunities, especially for vulnerable populations will be achieved by providing financial assistance to renters and homebuyers. For renters, this direct assistance will assist them to subsidize their current housing situations or move to a better home that better meets their needs. For homebuyers, the County's direct financial assistance will provide low-income households with an opportunity for stability and financial growth through homeownership.

#### Appendix 1

#### **Public Comment Summary**

From: Felicia Alingu <falingu@habitatnwma.org>

Sent: Wednesday, October 18, 2023 1:56 PM To: publiccomments@cobbcountycdbg.com

**Subject: PRO Housing Comments** 

Good afternoon,

I would like to share my comments on the PRO Housing draft proposal in advance of the public meeting.

To adequately address the prevalence of substandard housing units, there is a pressing need to assist older adults with funding for critical home repairs to keep homes safe, warm, dry, and accessible. The City of Marietta uses CDBG funding for this purpose in the form of a one-time grant of \$15,000. The city also provides non-payable loans forgivable after 20 years for low-to-moderate-income owner-occupied households (https://www.mariettaga.gov/1309/Housing-Rehabilitation). Habitat for Humanity has received repair requests for more than 200 homes owner-occupied by people over age 55 since 2021 and closed our inquiry form in 2023 due to lack of funding.

The proposal states a goal of deconcentrating "racial and ethnic poverty" but does not define that phrase. All census tracts within the Fair Oaks Census County Division are designated as low-to-medium income census tracts, in which 51% or more of the population is below 80% of the area median income. It is not clear that this area as a geographic priority would fulfill the stated goal of providing housing choices outside of "impacted areas" – albeit impacted areas is not defined.

The proposal states that smaller home sizes lead to lower per-unit construction and land costs. The city of Smyrna is proposed as a geographic priority, but the zoning ordinance in Smyrna does not allow single family homes smaller than 1,800 square feet.

#### Minimum Home Size (sqft)

Zoning District Cobb Smyrna R-30 1,350 2,200 R-20 1,200 2,100

R-15 1,150 2,000

R-12 1,000 1,900

The zoning districts necessary for "missing middle housing" fall within Cobb's Future Land Use

descriptions of High Density Residential (HDR) and Medium Density Residential (MDR). Only 25% of the land in unincorporated Cobb within the priority geography proposed is categorized as HDR or MDR.

Single family homes can be built in any residential future land use category, but higher density zoning districts may be necessary to adequately increase supply. The Board of Commissioners has a recent history of requiring larger minimum home sizes than the county's zoning ordinance requires when properties are rezoned, in addition to stipulating architectural design criteria that increases the cost to build (brick veneer, garages, etc). These stipulations are prompted by NIMBYism from existing residents, even though elimination of NIMBYism is listed as a goal for the county to reduce barriers to housing choice. Some of these stipulations (multistory homes) are in opposition to the stated goal of increasing the supply of homes accessible for people with disabilities and older adults.

It's not clear by the proposal whether Cobb is interested in focusing on missing middle housing or single-family housing.

Cobb County claims to have engaged stakeholders, but Habitat for Humanity was not involved in the proposal, despite being the subrecipient of HOME funds which enabled Cobb County to boast increases in affordable housing supply and provision of down payment assistance in 2021-2022.

Since January 2022, Habitat has received more than 2,400 interest forms from renters in our service area who are interested in affordable homeownership opportunities. Typically, about 16% of interest forms become applications and 12% of those applications meet Habitat's specific financial criteria. Therefore, our March 2024 application cycle will likely generate 44 qualified homebuyers who desire a mortgage of \$250,000 or less. We are privileged to have received ARPA funding from Cobb County to support affordable homeownership and hope to assist Cobb in this effort if the PRO Housing grant is received.

In addition to being employed in the county, I am also a Cobb resident (606 Hickory Trail SE, Mableton GA 30126).

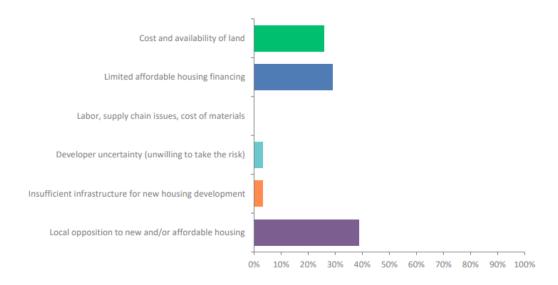
Thanks!

Felicia Alingu, MPH

#### **Stakeholder Survey**

# Q1: Please select one of the following barriers that has the most impact on affordable housing production in Cobb County?

Answered: 31 Skipped: 1



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# Q1: Please select one of the following barriers that has the most impact on affordable housing production in Cobb County?

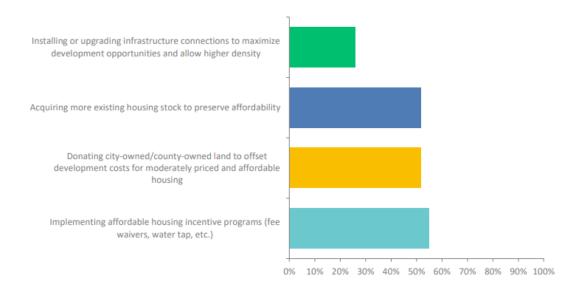
Answered: 31 Skipped: 1

ANSWER CHOICES	RESPONSES	
Cost and availability of land	25.81%	8
Limited affordable housing financing	29.03%	9
Labor, supply chain issues, cost of materials	0%	0
Developer uncertainty (unwilling to take the risk)	3.23%	1
Insufficient infrastructure for new housing development	3.23%	1
Local opposition to new and/or affordable housing	38.71%	12
TOTAL		31

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# Q2: Which option do you believe will assist the County in removing barriers to affordable housing? (Select all that apply.)

Answered: 31 Skipped: 1



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# Q2: Which option do you believe will assist the County in removing barriers to affordable housing? (Select all that apply.)

Answered: 31 Skipped: 1

ANSWER CHOICES	RESPONSES	
Installing or upgrading infrastructure connections to maximize development opportunities and allow higher density	25.81%	8
Acquiring more existing housing stock to preserve affordability	51.61%	16
Donating city-owned/county- owned land to offset development costs for moderately priced and affordable housing	51.61%	16
Implementing affordable housing incentive programs (fee waivers, water tap, etc.)	54.84%	17
TOTAL		57

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## Q3: Please rank the County's Proposed Pro Housing activities based on need.

Answered: 32 Skipped: 0



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### Q3: Please rank the County's Proposed Pro Housing activities based on need.

Answered: 32 Skipped: 0

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	HIGH	MEDIUM	LOW	TOTAL	WEIGHTED AVERAGE
Encouraging PRO Housing Development - Expand the supply of affordable housing by focusing on single family housing by financing the construction or rehabilitation of affordable housing and acquiring or disposing of land or real property for affordable housing.	37.50% 12	43.75% 14	18.75% 6	32	1.81
Infrastructure Activities to Reduce Housing Costs - Reduce housing costs by financing utility costs in affordable housing developments by supporting installation of new or upgrading utilities and/or infrastructure improvements and investing in neighborhood amenities.	15.62% 5	28.12% 9	56.25% 18	32	2.41
Preserve Affordable Housing Supply - Preserve the supply of dedicated affordable housing units and stabilize existing residents in housing by preventing evictions, creating quality rental opportunities, promoting home buying, offering down- payment and closing cost assistance, and housing counseling.	46.88% 15	28.12% 9	25.00% 8	32	1.78

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### Appendix 2

**Grant Application Detailed Budget Worksheet - 424-CBW**