**2023 Consolidated Annual Performance and Evaluation Report (CAPER)**

**Sandy Springs, GA**

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**Adopted: September 19, 2023**

**Submitted: September 20, 2023**

**U.S. Department of Housing and Urban Development**

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**Table of Contents**

**Consolidated Annual Performance Evaluation Report**

CR-05 - Goals and Outcomes - 91.520(a)

CR-10 Racial and Ethnic composition of (person/households/families) assisted

CR-15 Resources and Investments 91.520(a)

CR-20 Affordable Housing 91.520(b)

CR-25 Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

CR-30 Public Housing 91.220(h); 91.320(j)

CR-35 Other actions 91.220(j)-(k); 91.320(i)-(j)

CR-40 Monitoring 91.220(d, e); 91.520(c)

CR-45 CDBG 91.520(c)

## CR-05 - Goals and Outcomes

**Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

In March 2020, the City completed Phases I and II of the construction of sidewalks in the southern part of the City along Roswell Road within the eligibility area. The goal for the 2023 Action Plan was to continue with Phase III of the South Roswell Road Multiyear Project, with the design, and installation of pedestrian lighting between Roswell Road and GA-400 on Northridge Drive. This phase also included the design, and inclusive environmental work for street scape improvements along Roswell Road South of I-285 to Long Island Drive.

The following items were completed in FY2023:

* CDBG Sidewalks Phase 1B
* T0033-7 Roswell Road – Stewart Drive to Wentworth Street
* Installed 18 pedestrian lights
* Completion of SP-III is anticipated to be by the beginning of 2025.

Census Block Group target areas for the City's CDBG investments.  Each Block Group has at least 46.67 percent low- to moderate-income (LMI) residents, which is the City’s threshold for LMI benefit as an exception community.  The North Roswell Road Multiyear Project has been completed within the target areas shown on the north end of the city.

There will be installation of ADA sidewalk ramps, new sidewalk, streetlights and other improvements in the Roswell Road corridor south of I-285 for Phase IV construction.

2022-2023 Project Status Summary

The City has made progress with meeting its 2023 CDBG Program goals, and the CDBG Multiyear Sidewalk Construction Project is on schedule:

**2022**

* July: Phase 1A & 1B: Coordinated with GPC to install Ped lights. Coordinated with ZAYO and ATT to remove remaining poles.
* Phase 2: Right-of-way negotiations with property owners. Coordinate with GPC for redesign alternate options
* August: Phase 1A & 1B: Coordinated with GPC to install Ped lights. Coordinated with ATT to remove remaining poles.
* Phase 2: Right-of-way negotiations with property owners. Coordinate with GPC with final design and cost estimates
* September: Phase 1A & 1B: Coordinated with GPC to install Ped lights. Coordinated with ATT to remove remaining poles.
* Phase 2: Right-of-way negotiations with property owners. Coordinate with GPC with final design and cost estimates
* October: Phase 1A: GPC began ped lights installations.
* Phase 2: Right-of-way negotiations with property owners. Coordinate with GPC with final design and cost estimates
* November: Phase 1A: GPC completed ped lights installations.
* December: Phase 2: Right-of-way negotiations with property owners. Coordinates with GPC with final design and cost estimates. Coordinated with GPC to install Ped lights.

**2023**

* March: T0033-7 Roswell Road Ph 2 Received GA Power final design
* April: Right-of-way negotiations with property owners.
* May: Revise design per utility and right-of-way modifications. NTP for consultant to update cost to cure and appraisals.
* June: Begin Memorandum of Agreement (MOA) processing with GDOT for Phase 2 pedestrian lighting.

**Section 108 Loan Guarantee Program**

* CDBG regulations 24 CFR Part 570.700 describe a process whereby Sandy Springs can leverage up to 5 times its most recent CDBG allocation from HUD to increase the impact of its CDBG funds and benefit to LMI residents.
* In the summer of 2017, the City applied for an advance on its future CDBG allocations permitted under the Section 108 Loan Program in order to, more efficiently, complete Phase III of the South Roswell Road Multiyear Project. Phase III will include right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicap ramps, and brick pavers from I-285 down to Long Island Drive which are identified LMI (low/moderate income) target areas.
* In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance under Section 108 in the principal amount of $2.8 million.
* The Section 108 Loan Guarantee Program funds represent the infusion of a considerable amount of funding at once that will have a direct benefit on the LMI residents of the City.
* During 2023, the totality of the Section 108 funds were utilized.
* Payments continue to be made on schedule.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Goal** | **Category** | **Source / Amount** | **Indicator** | **Unit of Measure** | **Expected – Strategic Plan** | **Actual – Strategic Plan** | **Percent Complete** | **Expected – Program Year** | **Actual – Program Year** | **Percent Complete** |
| Public Improvements & Infrastructure | Non-Housing Community Development | CDBG: $528,553 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 3000 | 3015.32 | 100.00% | 3015.32 | 3015.32 | 100.00% |
| Public Service | Non-Housing Community Development | CDBG: $ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 3000 | 3015.32 | 100.00% |  |  |  |

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

Sandy Springs did not commit general funds to the 2023 sidewalk construction project; however, the City committed 100% of its 2023 CDBG entitlement allocation to this project. Phase III extends along west side portions of Roswell Road from Long Island Drive to Northwood Drive in the designated areas.

The City executed its CDBG Program by completing the following in 2023:

* Executed these activities consistently and in compliance with all CDBG regulations;

* No actions or willful inactions were taken to hinder the progress of the projects described in the Consolidated Plan; and

* One hundred percent (100%) of 2023 CDBG funds were committed to the benefit of low- and moderate-income persons living in the CDBG Target areas described in this, thus meeting the National Objective for the CDBG Program.

**CR-10 - Racial and Ethnic composition of families assisted**

**Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)**

|  |  |
| --- | --- |
|  | **CDBG** |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| White | 2,128.28 |
| Black or African American | 640.64 |
| Asian | 169.4 |
| American Indian or American Native | 6.16 |
| Native Hawaiian or Other Pacific Islander | 3.08 |
| Two or more races | 67.76 |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| **Total** | **3,015.32** |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| Hispanic | 437.36 |
| Not Hispanic | 3,642.64 |

Table 2 – Table of assistance to racial and ethnic populations by source of funds (2021 US Census)

**Narrative**

## CR-15 - Resources and Investments 91.520(a)

**Identify the resources made available**

|  |  |  |  |
| --- | --- | --- | --- |
| **Source of Funds** | **Source** | **Resources Made Available** | **Amount Expended During Program Year** |
| CDBG |  | 1,200,000 | 381,881 |

Table 3 – Resources Made Available (COSS)

**Narrative**

The following federal funds were made available for the 2008, 2009, 2010, 2011, 2012, 2013, and 2014 program years to accomplish the Goals and Objectives described in the 2008-2012, 2013-2017, and 2018-2023 Consolidated Plans, and the 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021 Action Plans:

Resources                                                                     Amount     Expended           Balance

1. 2008 CDBG Entitlement Funds (CDBG1)             $540,875.00        $540,875.00        $0.00

2. 2009 CDBG-R Recovery Act Funds (CDBGR)     $146,909.00        $146,909.00        $0.00

3. 2009 CDBG Entitlement Funds (CDBG2)             $539,982.00        $539,982.00        $0.00

4. 2010 CDBG Entitlement Funds (CDBG3)             $581,336.00        $581,336.00        $0.00

5. 2011 CDBG Entitlement Funds (CDBG4)             $489,289.00        $489,289.00        $0.00

6. 2012 CDBG Entitlement Funds (CDBG5)             $421,709.00        $421,709.00        $0.00

7. 2013 CDBG Entitlement Funds (CDBG6)             $533,275.00        $533,275.00        $0.00

8. 2014 CDBG Entitlement Funds (CDBG7)             $545,644.00        $545,644.00        $ 0.00

9. 2015 CDBG Entitlement Funds (CDBG8) $577,782.00 $577,782.00 $ 0.00

10. 2016 CDBG Entitlement Funds (CDBG 9) $592,429.00 $ 592,429.00 $0.00

11. 2017 CDB Entitlement Funds (CDBG 17) $574,431 $574,431 $0.00

12.2018 CDBG Entitlement Funds (CDBG 18) $625,188 $625, 188.00 $0.00

13. 2019 CDBG Entitlement Funds (CDBG 19) $627,731.00 $627,731 $0.00

13. 2020 CDBG Entitlement Funds (CDBG19) $653,109 $653,109.00 $0.00

14. 2021 CDBG Entitlement Funds (CDBG20) $612,756 $612,756 $0.00

15. 2023 CDBG Entitlement Funds (CDBG21) $550,054 $550,054 $0.00

16. 2023 CDBG Entitlement Funds (CDBG22) $528,553 528,553 $0.00

**Identify the geographic distribution and location of investments**

|  |  |  |  |
| --- | --- | --- | --- |
| **Target Area** | **Planned Percentage of Allocation** | **Actual Percentage of Allocation** | **Narrative Description** |
| 40.7% LMI Census Tracts | 100% | 100% | All funds used for Roswell Road Multiyear Sidewalk Project |

Table 4 – Identify the geographic distribution and location of investments

**Narrative**

Phase II of the Roswell Road Multiyear Sidewalk Project completed (March 2016) the sidewalk network in the qualified target areas along the Roswell Road corridor from Northridge Road to the Chattahoochee River and along Hightower Trail, specifically within Census Tract 131210101191, 131210101192, 131210101193. The City began work on the South Roswell Road Multiyear Sidewalk Project in 2017. This project still in progress during the 2023 program year.

Phase III of the South Roswell Sidewalk Project focuses on improving connectivity in CDBG target areas along the Roswell Road transportation corridor. Ultimately, the City desires to construct sidewalks to improve the network in the identified target areas, install required American with Disabilities Act (ADA) improvements, and make other improvements to the existing sidewalk network where none currently exists. Phase III consists of two sub-phases. Sub-phase I, from Long Island Drive to The Prado and Sub-phase 2, from Lake Placid Drive to Northwood Drive. Eligible Census Tracts are 010212-1, 010212-3, 010113-2, 010113-1, 010114-1, and 010114-3.

The geographic allocation of the City’s CDBG funds is guided by the determination that these funds can have the greatest impact when targeted to specific areas and leveraged with other local, state, and federal investments.  As provided for in 24 CFR Part 570.208(a)(1)(ii), the City may elect to use these target areas to meet National Objective requirements for selected projects that specifically meet the Area Benefit category of activities.

During the summer of 2017, the City applied for an advance on its future CDBG allocations permitted under the Section 108 Loan Program in order to more efficiently complete Phase IV of the South Roswell Road Multiyear Project. Phase III will include right-of-way appraisals, acquisition, and installation of pedestrian lighting, handicap ramps, and brick pavers from I-285 down to Long Island Drive, which are identified LMI (low/moderate income) target areas.

In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance under Section 108 in the principal amount of $2.8 million. The Section 108 Loan Guarantee Program funds represent the infusion of a considerable amount of funding at once that will have a direct benefit on the LMI residents of the City.

Exception Status

It is important to also note that HUD has granted the City of Sandy Springs exception status based on the upper quartile calculation that permits the City to apply an LMI (low/moderate income) Area Benefit threshold of 40.7% to these project activities in the designated target areas.

**Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City did not directly leverage its 2023 CDBG funds with general funds; however, with the completion of the construction of Phase II of the sidewalk project and the start of the construction of the South Roswell Road Multiyear Sidewalk Project (Phase IV), the City will capitalize on the intersection, paving and other infrastructure investments made by the City, Georgia Department of Transportation (GDOT) and private investors since the City’s incorporation in 2005 at various intersections, including Northridge Road and Roswell Road, and Dunwoody Place.

## CR-20 - Affordable Housing 91.520(b)

**Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.**

|  | One-Year Goal | Actual |
| --- | --- | --- |
| Number of homeless households to be provided affordable housing units | 0 | 0 |
| Number of non-homeless households to be provided affordable housing units | 0 | 0 |
| Number of special-needs households to be provided affordable housing units | 0 | 0 |
| **Total** | 0 | 0 |

Table 5- Number of Households

|  | One-Year Goal | Actual |
| --- | --- | --- |
| Number of households supported through rental assistance | 0 | 0 |
| Number of households supported through the production of new units | 0 | 0 |
| Number of households supported through the rehab of existing units | 0 | 0 |
| Number of households supported through the acquisition of existing units | 0 | 0 |
| **Total** | 0 | 0 |

Table 6 - Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

The City did not establish goals or objectives for the preservation or development of new affordable housing in Sandy Springs for its CDBG Program for the 2018-2023 Consolidated Planning period.  Initially, the City analyzed the 2027 Comprehensive Plan and City Center Master Plan to ensure that affordable, workforce housing is encouraged. The City adopted a 5-year update to its Next 10 Comprehensive Plan in 2023, which encourages a mix of uses and range of housing options by taking steps to expand the City's affordability to middle-income residents and provide support for seniors and other special-needs populations.  Also, the City has adopted its new Zoning Code in August 2017, which provides various incentives for the development of workforce housing, including height bonuses for affordable units. Additionally, the City completed its Housing Needs Assessment in 2020.

As described in previous sections of the 2022 CAPER, the City has executed a multiyear sidewalk program in the CDBG target areas on Roswell Road. The Housing Authority of Fulton County (HAFC) has elderly housing units in Sandy Springs, as well as approximately 50 Housing Choice voucher participants who are currently living in Sandy Springs.

Almost 60% of the housing units in Sandy Springs are apartments, condominiums, and townhomes.  These units represent the most affordable housing available in Sandy Springs.  An informal survey of apartment developments was completed as part of the Analysis of Impediments to Fair Housing Choice adopted March 2, 2010.  Staff surveyed seventy-four apartment developments across the city in August and September of 2009 representing 11,171 rental units.  Sixty-two percent of the seventy-four developments had 2-bedroom units priced at or below the median contract rent as published in the 2000 Census ($796) for Sandy Springs. Sixty-two percent of the twenty-nine developments had 2-bedroom units priced at or below the median contract rent as published in the 2010 Census ($824) for Sandy Springs.

The Next 10 Comprehensive Plan specified, “there are approximately 42,000 housing units in the city. Of those, 22,000 are rented-occupied, and 20,000 are owner-occupied. The city is comprised of 53% renters, with the renter households tending to be lower income than the ownership households. The majority of renters have monthly housing cost of $800 to $1,500 per month, while most owners pay $2,000 or more per month. There are approximately 7,600 units of housing in the city with a cost of less than $800 per month; proportionally, these make up 18% of all units in the city.” (page 52)

**Discuss how these outcomes will impact future annual action plans.**

Based on the current availability of affordable housing, the City does not anticipate providing for new units or programs in future Annual Action Plans.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

|  |  |  |
| --- | --- | --- |
| **Number of Persons Served** | **CDBG Actual** | **HOME Actual** |
| Extremely Low-income | 0 | 0 |
| Low-income | 0 | 0 |
| Moderate-income | 0 | 0 |
| **Total** | **0** | **0** |

Table 7 – Number of Persons Served

**Narrative Information**

The City did not allocate any of its CDBG Program funds in 2022 to this activity category.  However, the Analysis of Impediments was adopted on February 3, 2015, as described earlier, and outreach activities to promote fair housing in Sandy Springs have been identified for future implementation. The City is required to submit the new Assessment of Fair Housing by 2024, replacing the previous Analysis of Impediments.

For 2018, the City did not participate in the HOME Investment Partnerships Program (HOME), or the American Dream Down payment Initiative Program (ADDI), which are affordable housing programs administered by Fulton County.

## CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

**Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness through:**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City did not dedicate CDBG funds in 2023 to addressing homeless needs. There are two well-established nonprofit social service providers who address homelessness as part of their service mission in Sandy Springs.

The Community Assistance Center (CAC) provides services to persons in need and those threatened with homelessness in Sandy Springs and Dunwoody.  The CAC also provides a Youth Enrichment Program; short-term financial assistance with rent, mortgage and utility payments; and a food pantry and thrift shop, at 1130 Hightower Trail, Sandy Springs, GA 30350.  The CAC receives support from a variety of public, private, foundation, faith-based and individual contributors.  Many of the clients served by the CAC rely on public transit and walk to the CAC to obtain services.  As described previously, the City has completed construction of Phase I (Hightower Trail) directly benefiting the clients who receive assistance from the CAC.  The City also provides a Certificate of Consistency with the Consolidated Plan for the CAC each year so that the agency may apply to the Georgia Department of Community Affairs (DCA) for funding to support its service delivery and programs. Furthermore, the City of Sandy Springs provides an annual stipend from the General Fund to support the mission of the CAC.

In addition to the CAC, Mary Hall Freedom House is located in Sandy Springs.  This agency provides transitional housing and homelessness prevention services for women and for women with children seeking shelter from domestic violence and in need of supportive services to eliminate substance abuse.  The Reaching New Heights (RNH) and Higher Ground II (HG2) programs are HUD-funded Supportive Housing programs located in a local apartment development in Sandy Springs.  RNH is a 17-unit transitional housing program that serves homeless, single women and women with children.  HG2 is a permanent housing program that serves chronically homeless single women, with a capacity of 60 beds.

The City is also included in the HUD Continuum of Care planning process and has the option to refer homeless residents in Sandy Springs to the Gateway Center, the Jefferson Place Homeless Shelter and to other facilities and services as needed.

According to the 2012-2016 American Community Survey, among the civilian noninstitutionalized population, the City has close to 6,493 residents with a disability. Approximately 1.8% under the 18 years of age are disabled, 4.2% between 18 and 64 years are disabled, and 25.3% 65 years and over have some type of disability. According to the 2012-2016 American Community Survey, for the disabled under 18 years old, the primary disability category were cognitive difficulties. For disabled persons aged 18-64, the primary disability categories were ambulatory, cognitive, or independent living difficulties. For those 65 and over, hearing, ambulatory and independent living difficulty were the primary disabilities.

Given the infrastructure priority for the CDBG Program, the City did not establish specific objectives for providing services, housing or other programs for special needs populations using CDBG funds.  Although the City is not proposing to add any special needs housing, under the 2018-2023 Consolidated Plan, the plan is to improve pedestrian mobility in the target areas, which will benefit disabled residents who cannot drive a vehicle.

For the purposes of the 2022 Annual Action Plan, Sandy Springs relied on Fulton County and nonprofit service providers in the North Fulton area to address service needs for these targeted populations.  The City will continue to review agency requests for certificates of consistency to support these agencies in their need to access HUD, Georgia Department of Community Affairs (DCA), and other resources to address service needs where consistent with the Consolidated Plan.  The City also maintains disability-related information and links to services for the disabled on its website, along with other social service links for its residents at [Planning and Zoning | City of Sandy Springs (sandyspringsga.gov)](https://www.sandyspringsga.gov/planning-and-zoning)

**Addressing the emergency shelter and transitional housing needs of homeless persons**

There are no emergency homeless shelters in Sandy Springs and the City did not dedicate CDBG funds to homeless services or activities in the 2023.  However, housing units and services available to the homeless in Fulton County, and the City of Atlanta are also available to homeless persons in Sandy Springs.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

See above.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

See above.

## CR-30 - Public Housing 91.220(h); 91.320(j)

**Actions taken to address the needs of public housing**

The Housing Authority of Fulton County (HAFC) was the public housing agency for the unincorporated areas of Fulton County prior to the City’s incorporation on December 1, 2005. The HAFC operates 1 housing property within the City limits of Sandy Springs. The HAFC converted its public housing property, the Allen Road Mid-Rise (now called Sterling Place), located at 144 Allen Road, to the Project Based Vouchers and the Rental Assistance Demonstration (RAD) Program in 2013, rehabilitation construction was completed in February 2016.

In 2015, the HAFC was awarded 9% tax credit funding from the Georgia Department of Community Affairs, along with HUD Rental Assistance Demonstration (“RAD”) funding for Allen Road Midrise. Upon closing of the financing in February 2015, the formerly public housing building converted to Project Based Voucher. This 100-unit residential property continues to be for low-income elderly and disabled residents. Renovations to the building were completed in spring of 2016.

The HAFC has also traditionally placed some Housing Choice Voucher (Section 8) residents in market-rate units in Sandy Springs.

In addition to traditional public housing units and programs, the HAFC participated in the development of three multifamily properties in Sandy Springs, the Commons of Victoria Park and Monterey using its multifamily housing bond program and through partnering with private developers.  While not in the identified CDBG Target areas, these properties will benefit from the sidewalk improvements initiated in 2010 as these improvements will improve access to commercial areas, parks, public transit and services across the sidewalk network.

**Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

The City did not plan to take any actions to encourage resident participation in public housing management and/or homeownership programs at the facilities managed by the Housing Authority of Fulton County (HAFC) in its 2023 Annual Action Plan.

**Actions taken to provide assistance to troubled PHAs**

N/A

## CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

As part of the Housing Goals adopted in the Next 10 Comprehensive Plan, the city formed a Taskforce responsible for researching potential incentive and redevelopment strategies as well as workforce housing strategies for the north-end of Sandy Springs. The Taskforce recommendations were presented to Mayor and Council in January 2023. In January 2023, the taskforce provided recommendation on potential plans for the North End of the City, which included among other recommendations “a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there.”

The Next Ten Comprehensive Plan states the following priority actions for housing needs:

* Preserve established single-family neighborhoods
* Increase the supply of housing and the range of housing choices
* Promote opportunities and incentives for workforce and mixed-income housing in mixed-use and targeted redevelopment areas
* Ensure zoning and Development Code regulations allow the provision of housing options to complement local employment growth and improve the city’s jobs-housing balance

• Ensure zoning and Development Code regulations allow the provision of housing for seniors and special-needs populations

Additionally, the Development Code has included height incentives in exchange for providing workforce housing within specific zoning districts.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

In 2022, the city continued the completion of Phase III of the South Roswell Road Multiyear Project, specifically the area south of Interstate 285, which includes right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicapped ramps and brick pavers from I-285 down to Long Island Drive. Because the City’s focus for 2018-2023 is on infrastructure improvements, it did not undertake any additional analysis related to other underserved needs relevant to the 2022 CDBG Program.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The City did not engage in any housing or other rehabilitation activities in 2022 that would trigger compliance with the Lead-based Paint rule as published at 24 CFR Part 35.  It is anticipated that for the duration of the 2018-2023 Consolidated Plan, the City will not undertake any activities that would require compliance with the lead-based paint rule.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Taking into consideration factors over which the City has control and using its limited CDBG funds for its infrastructure priorities, the City did not establish an antipoverty strategy in 2018 and does not anticipate doing so for the period of the 2018-2023 Consolidated Plan.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The focus of the City’s 2016 CDBG Program was to complete construction of Phase II and begin construction on Lower Roswell Road, which is necessary to upgrade the sidewalk network in the LMI target areas along Roswell Road.

The focus of the City’s 2017 CDBG Program was to continue with Phase III of the South Roswell Multiyear Project. In 2017, survey design, site environmental studies, and ROW acquisition work, along with pre-purchase of pedestrian lighting was completed.

In 2018, pre-construction work for the South Roswell Road Streetscape Project began. Advance utility relocations started in fall of 2019. Project construction began in late 2019. No construction for the South Roswell Road Streetscape Project was completed in 2018.

 As described earlier, infrastructure improvements are the City’s priority; therefore, the need to develop a more extensive institutional service delivery structure was not required for this reporting period as the City used its current staff to manage the 2023 CDBG Program.  It is expected that this approach will prove to be all that is required for the period of the 2018-2023 Consolidated Plan unless City Council amends the program to focus on other eligible activities.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

While the City has not adopted any specific strategies to address homelessness and the priority needs of homeless persons, the City has provided a $100,000 grant from its general fund to the Community Assistance Center (CAC) annually since 2010. These grant funds have been used by the CAC to further its programs for low and moderate-income individuals. In addition to continuing its support of the CAC, the City’s objectives for enhancing coordination for the 2023 program year were as follows:

1. Coordinate with the Fulton County Office of Workforce Development to determine if programs or partnerships with service agencies could help the City achieve a reasonable antipoverty strategy.

The City has not developed any programs or partnerships at this time.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City’s Analysis of Impediments to Fair Housing (AI) report was adopted on March 2, 2010. The AI was submitted to HUD’s Office of Fair Housing and Equal Opportunity (OFHEO) on March 3, 2010. The AI identified the following “General Recommendations for Promoting Fair Housing”:

1. Establish a fair housing information website.

This task was completed, and information can be found at the following link:

<https://live-unified-platform.pantheonsite.io/sites/default/files/2021-07/Analysis-of-Impediments-to-Fair-Housing.pdf>

2. Highlight fair housing activities in Sandy Springs during National Fair Housing month every April.

The City recognized Fair Housing month through adoption of a resolution in 2013 and hosted a CDBG Program 40th Anniversary event with a Fair Housing component.

3. Explore partnerships with Sandy Springs Community Action Center (CAC) and Holy Spirit Catholic Church to ensure fair housing information is available for Hispanic/Latino residents.

In 2011, the City worked with the CAC to develop fair housing information for a brochure that was produced in 2012. These brochures were updated in 2018 and distributed to CAC and the City’s seventy plus apartment complexes in August 2018. Also, brochures advertising the fair housing trainings were distributed to the general public through property managers of apartments complexes, fliers were posted in open spaces, and fliers were given for distribution to other housing service providers.

4. As part of annual apartment certification requirements provide information to landlords on fair housing.

See Recommendation #3 above.

5. Develop a fair housing outreach program for residents of Sandy Springs’ rental properties for support if residents suspect they have experienced housing discrimination.

The City will reach out to the CAC to develop an annual joint event in the future.

6. Explore partnerships with Cred-Ability or other financial counseling agencies for outreach opportunities to Sandy Springs minority residents.

See Recommendation #5 above.

7. Future Comprehensive Plan updates should analyze opportunities to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs’ policies.

The City adopted a 5-year update to its Next 10 Comprehensive Plan in February 2023. The Next Ten seeks to establish zoning to encourage workforce housing by adopting a workforce housing ordinance to incentivize the creation of new affordable workforce housing in new developments. Additionally, the 2017 Development Code provides incentives such as height bonuses for the creation of affordable units in new housing projects.

As part of the implementation of the priority actions stated in the Next 10, the City established a Taskforce in February 2018 responsible for conducting detailed research and analysis on available resources and tools to be used to incentivize and promote the redevelopment of certain areas of the city as well as evaluating potential workforce housing policies and strategies. The City continues to use these recommendations from the taskforce.

8. Complete an accessibility survey of available rental housing accessible to persons with disabilities in Sandy Springs to ensure compliance with fair housing law. Coordinate this recommendation with Sandy Springs ADA Coordinator.

The City has not taken action on this recommendation at this time.

The City provides the CAC an annual $100,000 to aid with their fair housing efforts and other community outreach events.

1. Highlight fair housing activities in Sandy Springs during National Fair Housing month every April. Atlanta Metro Fair Housing has expressed an interest in partnering with Sandy Springs on possible future outreach events. (April is designated National Fair Housing Month each year by HUD.)

The City recognized Fair Housing month through adoption of a resolution in 2016. In Spring 2017, staff hosted three fair housing meetings as part of the Assessment of Fair Housing. These meeting were open to the public and were advertised by brochures distributed to apartment complexes and housing service providers, as well as posted in public recreational facilities. The meetings served for discussion on fair housing issues and opportunities. General information on fair housing law, how to identify discriminatory actions, and how to file a Fair Housing complaint were among the topics discussed at the meetings.

In summer 2018, two Fair Housing Education Workshops were hosted, one for the professionals of the city and the second session for residents.

Additionally, in Fall 2021 staff conducted a Housing Needs Assessment to discuss fair housing challenges and opportunities. Stakeholders attended these meetings as well.

1. Preserve partnerships with Sandy Springs Community Assistance Center (CAC) and Holy Spirit Catholic Church to ensure fair housing information is available for Hispanic/Latino residents. Consider partnerships with other nonprofit and faith-based organizations that serve minority residents in Sandy Springs to promote fair housing.

In 2011, the City worked with the CAC to develop fair housing information for a brochure that was produced in 2012. The brochures were distributed to CAC and the City’s seventy plus apartment complexes in August 2012 and in the summer of 2014.

In Spring 2017 brochures advertising the fair housing meetings were distributed to the general public through apartments complexes, fliers were posted in public recreational facilities, and fliers were given for distribution to other housing service providers. The city invited Housing Stakeholders such as non-profits, churches, community leaders to these meetings to discuss potential fair housing issues. The City is in continued communication with stakeholders regarding consultation of CDBG plans.

In 2018, Fair Housing brochures were updated and distributed to apartment complexes and property managers located within the eligible area where streetscape improvements are taking place. Fair housing trainings were conducted in August 2018. These were targeted to professional housing providers and the public.

Additionally, in Fall 2020 staff conducted a Housing Needs Assessment to discuss fair housing challenges and opportunities. Stakeholders attended these meetings as well.

The City maintains annual communication with the CAC, other housing providers, and religious organizations regarding CDBG initiatives. The City annually requests public comment for CDBG reports.

1. As part of annual apartment certification requirements provide information to landlords on fair housing. Evaluate how to best incorporate this with the apartment inspection ordinance and enforcement procedures.

See Recommendation #3 above.

1. Maintain a fair housing outreach program for residents of Sandy Springs’ rental properties to include basic information on Fair Housing laws and agencies that are available for support if residents suspect they have experienced housing discrimination. Consider partnerships with the Atlanta Board of Realtors, the Apartment Council and other similar organizations.

The City will reach out to the CAC and Cred-Ability (formerly Consumer Credit Counseling Service) to develop an annual joint event in the future. Additionally, in Fall 2021 staff conducted a Housing Needs Assessment to discuss fair housing challenges and opportunities. Stakeholders attended these meetings as well.

1. Continue to explore partnerships with CAC or other financial counseling agencies for outreach opportunities to Sandy Springs minority residents since poor credit histories and other financial management issues have the greatest impact on minority loan denial rates according to HMDA data for the Atlanta-Sandy Springs-Marietta MSA.

No action has been taken on this recommendation at this time.

1. Assess whether opportunities exist to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs’ policies.

The Next 10 Comprehensive Plan, updated in 2023, sets as one of its goals to “adopt a workforce housing ordinance specifying the number/percentage of units to be set aside as workforce housing and the size of projects to which this requirement applies.” The Development Code adopted in August 2017, provides incentives such as height bonuses for new developments that provide affordable workforce housing units. There are two apartment complexes that have Land Use Restriction Agreements with the City, where the apartments complexes are required to provide a certain percentage of rental units as workforce housing units.

1. Complete an accessibility survey of available rental housing accessible to persons with disabilities in Sandy Springs to ensure compliance with fair housing law. Coordinate this recommendation with Sandy Springs ADA Coordinator.

The City has not taken action on this recommendation at this time.

1. Provide incentives for the inclusion of affordable units within new developments.

The City has adopted its Development Code in August 2017, which includes incentives, such as height bonuses, for the creation of workforce housing in new developments.

In Fall 2020, Staff completed a Housing Needs Assessment.

## CR-40 - Monitoring 91.220 and 91.230

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The year 2018 was the eleventh year of the City’s participation in the CDBG Program.  The City monitored its CDBG program regularly throughout the program year, and staff regularly updated the Director of Community Development, Director of Public Works, Assistant City Manager, City Manager, and the Mayor and City Council on the status of the CDBG Program.

Five (5) agenda items and corresponding CDBG documents were presented to the Mayor and City Council from July 2021 through June 2023 to complete the planning and reporting required for the CDBG Program and to ensure the program remained in compliance with HUD regulations and guidelines.  In 2023, staff continued to review procedures for record-keeping, procurement, contracting and other processes in anticipation of future HUD monitoring reviews.  Emphasis was placed on using HUD’s established monitoring checklists, where they exist, to structure the City’s CDBG Program records.  These documents, as well as policies and procedures for managing the program are available in the City’s CDBG Program Policies and Procedures manual.

Also, to ensure the benefits of the project are reported consistent with HUD’s objective and outcome measures, the City reports its progress in providing access to a suitable living environment by using Census data that document the LMI persons who live in the CDBG target areas.  At the conclusion of the project, up to 6,555 LMI persons living in the neighborhoods along Roswell Road will live in areas with a complete sidewalk network and have the option to walk to Kroger, Publix, CVS, MARTA, Ison Road Elementary School, Morgan Falls Park, Big Trees Forest Preserve, Fulton County’s new community health center, the CAC, and other city services without having to drive.  Sidewalk construction on upper Roswell Road area was completed in spring of 2016.  The CDBG target areas that will benefit from the services previously mentioned.  The multiyear sidewalk project will benefit all of the target areas on the north side of Sandy Springs and the surrounding neighborhoods.

In accordance with HUD requirements, the City submitted its MBE reports in October and May as required showing contracts and subcontracts that have been awarded to minority businesses.

**Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

Consistent with the requirements of the Citizen Participation Plan, a public hearing is also required at the time the City’s draft CAPER is available for review.  The public hearing for the 2023 CAPER will be September 19, 2023, and public comments will be included in the Appendix to this report.

Media                                                       Start                      End                     Days

Mundo Hispanico Atlanta August 16          September 19 35

Sandy Springs Neighbor                            August 16           September 19 35

Sandy Springs Reporter August 16         September 19 35

Sandy Springs website                               August 16           September 19 35

## CR-45 - CDBG 91.520(c)

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

There have been no changes to the City’s program objectives.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

## CR-60 - ESG 91.520(g) (ESG Recipients only)

**ESG Supplement to the CAPER in *e-snaps***

**For Paperwork Reduction Act**

**1. Recipient Information—All Recipients Complete**

**Basic Grant Information**

|  |  |
| --- | --- |
| **Recipient Name** | SANDY SPRINGS |

|  |  |
| --- | --- |
| **Organizational DUNS Number** | 619646040 |

|  |  |
| --- | --- |
| **EIN/TIN Number** | 203767748 |

|  |  |
| --- | --- |
| **Identify the Field Office** | ATLANTA |

|  |  |
| --- | --- |
| **Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance** |  |

**ESG Contact Name**

|  |  |
| --- | --- |
| **Prefix** |  |

|  |  |
| --- | --- |
| **First Name** |  |

|  |  |
| --- | --- |
| **Middle Name** |  |

|  |  |
| --- | --- |
| **Last Name** |  |

|  |  |
| --- | --- |
| **Suffix** |  |

|  |  |
| --- | --- |
| **Title** |  |

**ESG Contact Address**

|  |  |
| --- | --- |
| **Street Address 1** |  |

|  |  |
| --- | --- |
| **Street Address 2** |  |

|  |  |
| --- | --- |
| **City** |  |

|  |  |
| --- | --- |
| **State** |  |

|  |  |
| --- | --- |
| **ZIP Code** | - |

|  |  |
| --- | --- |
| **Phone Number** |  |

|  |  |
| --- | --- |
| **Extension** |  |

|  |  |
| --- | --- |
| **Fax Number** |  |

|  |  |
| --- | --- |
| **Email Address** |  |

**ESG Secondary Contact**

|  |  |
| --- | --- |
| **Prefix** |  |

|  |  |
| --- | --- |
| **First Name** |  |

|  |  |
| --- | --- |
| **Last Name** |  |

|  |  |
| --- | --- |
| **Suffix** |  |

|  |  |
| --- | --- |
| **Title** |  |

|  |  |
| --- | --- |
| **Phone Number** |  |

|  |  |
| --- | --- |
| **Extension** |  |

|  |  |
| --- | --- |
| **Email Address** |  |

**2. Reporting Period—All Recipients Complete**

|  |  |
| --- | --- |
| **Program Year Start Date** | 07/01/2022 |

|  |  |
| --- | --- |
| **Program Year End Date** | 06/30/2023 |

**3a. Sub recipient Form – Complete one form for each sub recipient**

|  |
| --- |
| **Sub recipient or Contractor Name** |
| **City** |
| **State** |
| **Zip Code** |
| **DUNS Number** |
| **Is sub recipient a victim services provider** |
| **Sub recipient Organization Type** |
| **ESG Sub grant or Contract Award Amount** |

## CR-65 - Persons Assisted

**4. Persons Served**

**4a. Complete for Homelessness Prevention Activities**

|  |  |
| --- | --- |
| **Number of Persons in Households** | **Total** |
| Adults |  |
| Children |  |
| Don’t Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 8 – Household Information for Homeless Prevention Activities

**4b. Complete for Rapid Re-Housing Activities**

|  |  |
| --- | --- |
| **Number of Persons in Households** | **Total** |
| Adults |  |
| Children |  |
| Don’t Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 9 – Household Information for Rapid Re-Housing Activities

**4c. Complete for Shelter**

|  |  |
| --- | --- |
| **Number of Persons in Households** | **Total** |
| Adults |  |
| Children |  |
| Don’t Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 10 – Shelter Information

**4d. Street Outreach**

|  |  |
| --- | --- |
| **Number of Persons in Households** | **Total** |
| Adults |  |
| Children |  |
| Don’t Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 11 – Household Information for Street Outreach

**4e. Totals for all Persons Served with ESG**

|  |  |
| --- | --- |
| **Number of Persons in Households** | **Total** |
| Adults |  |
| Children |  |
| Don’t Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 12 – Household Information for Persons Served with ESG

**5. Gender—Complete for All Activities**

|  |  |
| --- | --- |
|  | **Total** |
| Male |  |
| Female |  |
| Transgender |  |
| Don't Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 13 – Gender Information

**6. Age—Complete for All Activities**

|  |  |
| --- | --- |
|  | **Total** |
| Under 18 |  |
| 18-24 |  |
| 25 and over |  |
| Don’t Know/Refused/Other |  |
| Missing Information |  |
| **Total** |  |

Table 14 – Age Information

**7. Special Populations Served—Complete for All Activities**

**Number of Persons in Households**

| **Subpopulation** | **Total** | **Total Persons Served – Prevention** | **Total Persons Served – RRH** | **Total Persons Served in Emergency Shelters** |
| --- | --- | --- | --- | --- |
| Veterans |  |  |  |  |
| Victims of Domestic Violence |  |  |  |  |
| Elderly |  |  |  |  |
| HIV/AIDS |  |  |  |  |
| Chronically Homeless |  |  |  |  |

| **Persons with Disabilities:** | | | | |
| --- | --- | --- | --- | --- |
|  |  |  |  |  |
| Severely Mentally Ill |  |  |  |  |
| Chronic Substance Abuse |  |  |  |  |
| Other Disability |  |  |  |  |
| Total (unduplicated if possible) |  |  |  |  |

Table 15 – Special Population Served

## CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

**10. Shelter Utilization**

|  |  |
| --- | --- |
| Number of New Units – Rehabbed |  |
| Number of New Units – Conversion |  |
| Total Number of bed - nights available |  |
| Total Number of bed - nights provided |  |
| Capacity Utilization |  |

Table 16 – Shelter Capacity

**11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)**

## CR-75 – Expenditures

**11. Expenditures**

**11a. ESG Expenditures for Homelessness Prevention**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Dollar Amount of Expenditures in Program Year** | | |
|  | **2020** | **2021** | **2023** |
| Expenditures for Rental Assistance |  |  |  |
| Expenditures for Housing Relocation and Stabilization Services - Financial Assistance |  |  |  |
| Expenditures for Housing Relocation & Stabilization Services - Services |  |  |  |
| Expenditures for Homeless Prevention under Emergency Shelter Grants Program |  |  |  |
| **Subtotal Homelessness Prevention** |  |  |  |

Table 17 – ESG Expenditures for Homelessness Prevention

**11b. ESG Expenditures for Rapid Re-Housing**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Dollar Amount of Expenditures in Program Year** | | |
|  | **2020** | **2021** | **2023** |
| Expenditures for Rental Assistance |  |  |  |
| Expenditures for Housing Relocation and Stabilization Services - Financial Assistance |  |  |  |
| Expenditures for Housing Relocation & Stabilization Services - Services |  |  |  |
| Expenditures for Homeless Assistance under Emergency Shelter Grants Program |  |  |  |
| **Subtotal Rapid Re-Housing** |  |  |  |

Table 18 – ESG Expenditures for Rapid Re-Housing

**11c. ESG Expenditures for Emergency Shelter**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Dollar Amount of Expenditures in Program Year** | | |
|  | **2020** | **2021** | **2023** |
| Essential Services |  |  |  |
| Operations |  |  |  |
| Renovation |  |  |  |
| Major Rehab |  |  |  |
| Conversion |  |  |  |
| **Subtotal** |  |  |  |

Table 19 – ESG Expenditures for Emergency Shelter

**11d. Other Grant Expenditures**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Dollar Amount of Expenditures in Program Year** | | |
|  | **2020** | **2021** | **20** |
| Street Outreach |  |  |  |
| HMIS |  |  |  |
| Administration |  |  |  |

Table 20 - Other Grant Expenditures

**11e. Total ESG Grant Funds**

|  |  |  |  |
| --- | --- | --- | --- |
| **Total ESG Funds Expended** | **2020** | **2021** | **2023** |
|  |  |  |  |

Table 21 - Total ESG Funds Expended

**11f. Match Source**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **2020** | **2021** | **2023** |
| Other Non-ESG HUD Funds |  |  |  |
| Other Federal Funds |  |  |  |
| State Government |  |  |  |
| Local Government |  |  |  |
| Private Funds |  |  |  |
| Other |  |  |  |
| Fees |  |  |  |
| Program Income |  |  |  |
| **Total Match Amount** |  |  |  |

Table 22 - Other Funds Expended on Eligible ESG Activities

**11g. Total**

|  |  |  |  |
| --- | --- | --- | --- |
| **Total Amount of Funds Expended on ESG Activities** | **2020** | **2021** | **2023** |
|  |  |  |  |

Table 23 - Total Amount of Funds Expended on ESG Activities