



City of Albany 2021 Analysis of Impediments to Fair Housing Choice

Draft
March 2021



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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

For Program Years 2021 to 2025

ALBANY, GEORGIA

City of Albany

Department of Economic & Community Development

April 2021

Prepared for the City of Albany by
Mosaic Community Planning, LLC





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Chapter 1. Introduction

The purpose of this Analysis of Impediments to Fair Housing Choice is to study a broad array of public and private policies, practices, and procedures affecting housing choice in Albany. This document will provide detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates in the city with a foundation upon which to implement strategies that will address disparities in housing needs and in access to opportunity; support integrated living patterns; and maintain compliance with civil rights and fair housing laws.

Fair Housing Planning

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

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD's housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities like Albany that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an "Analysis of Impediments to Fair Housing Choice" (AI). In an AI, grantees evaluate barriers to fair housing choice and develop strategies and actions to overcome identified impediments based on their histories, circumstances, and experiences. Through this process, communities promote fair housing choice for all persons, including classes protected under the Fair Housing Act, and promote racially and ethnically inclusive patterns of housing occupancy, identify structural and systematic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD presumes that a grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

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

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

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlined procedures that jurisdictions and public housing authorities that participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to

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

opportunity based on protected class characteristics. Under HUD's final rule, grantees were required to take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD began providing publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule originally mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In September of 2020, HUD repealed its 2015 AFFH rule altogether, however, absent any substitute guidance from HUD on precisely how to assure compliance with their obligations to affirmatively further fair housing, many grantees continue to prepare AIs as a fail-safe measure. By periodically conducting an AI and working to implement the policies and programs proposed by the analysis, grantees provide themselves a solid footing for their AFFH certification.

Mosaic Community Planning assisted Albany with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows the requirements in HUD's *Fair Housing Planning Guide* but also complies with the regulations and assessment tool established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

Definitions

Affirmatively Further Fair Housing – In keeping with the text of HUD's 2015 *Affirmatively Furthering Fair Housing* regulation, to Affirmatively Further Fair Housing Choice (AFFH) is to take "meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."²

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD's definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.

Fair Housing Choice - In carrying out this Analysis of Impediments to Fair Housing Choice, Albany used the following definition of "Fair Housing Choice":

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

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

2 "Affirmatively Furthering Fair Housing; Final Rule," published July 16, 2015, at 80 FR 42272.

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

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

Protected Classes – The following definition of federally protected classes is used in this document:

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

Data Sources

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

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2014-2018 ACS 5-year estimates are used most often in this analysis.

Chapter 2. Community Participation Process

Community Engagement Overview

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in the city of Albany. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including a community input session, stakeholder interviews, a survey targeted to homeless individuals and a housing authority focus group.

Community Input Session

In February 2021, the planning team facilitated virtual community input session to understand fair housing issues in the city of Albany. The session was held via Zoom, and residents could join online or by phone. The community input session was held on Monday, February 15, 2021 At 6:00 PM and was attended by 55 residents.

Publicity for Virtual Public Meeting

Advertisement for the public meeting targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Public notice of the meeting was provided to residents through news announcements on the City's website and external organizational websites, such as the SOWEGA Rising Facebook page.

Meeting advertisements noted that accommodations (specifically accessibility needs) were available if needed; no requests for accommodations were received.

LET'S TALK
About using HUD grants in Albany!

What community improvements would you like to see?
What types of housing are available in Albany? Is housing affordable?
Does your neighborhood have access to good schools, jobs, and other resources?

JOIN A VIRTUAL CONVERSATION
Monday
February 15
6:00 p.m.
Zoom Meeting ID:
811 9861 5263
Passcode: 986667

The City of Albany is preparing a Five-Year Consolidated Plan, an Annual Action Plan, and a fair housing study known as an Analysis of Impediments to Fair Housing Choice. These plans are required by the U.S. Department of Housing and Urban Development (HUD) as a prerequisite to receiving funding and address local needs related to housing, economic and community development, and homelessness.

The City of Albany adheres to the rules and regulations of the Americans with Disabilities Act of 1990. If you have special needs that must be met to facilitate your attendance, please call (800) 251-2910. Telephone assistance is available for persons with hearing impairments through the State of Georgia's public service called Georgia Relay which is available 24 hours a day, 365 days a year. To make a Georgia Relay call, dial 771. Upon request, Spanish interpretation is available. Requests for interpretation may be made by contacting Ginette Mills (gimills@albanyga.gov or 229-302-1251) and must be received by Monday, February 8, 2021.





Stakeholder Interviews

The planning team also engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Interviews typically lasted 45 minutes to one hour and included discussions about barriers to fair housing, discrimination, access to opportunity, and fair housing resources. Twelve (12) community stakeholders participated in interviews with the planning team. Participating stakeholders represented a range of viewpoints, including affordable housing, education, homelessness services, senior services, people with disabilities, regional service coordination, and others.

Participating Organizations

Twelve representatives from 10 agencies participated in an interview. Organizations from which one or more representatives participated in the development of this AI include the following:

- A Better Way Grocers
- Albany Community Together
- Albany State University
- ARC of Southwest GA
- City of Albany, Downtown Development Authority
- Dougherty County Public Library
- Family Literacy Connection
- SOWEGA Council on Aging
- SOWEGA Rising
- United Way

Focus Groups

In addition to the community input session and stakeholder interviews, the planning team partnered with the Albany Housing Authority and The Columbus Organization to sponsor virtual focus groups to engage with segments of the community with a greater tendency to experience fair housing issues. The first of these groups was made up of caseworkers from The Columbus Organization, a regional service provider for people with intellectual or developmental disabilities. After a presentation regarding the Analysis of Impediments being developed, the case workers were asked for input on housing needs and experiences with housing discrimination in Albany. Eight caseworkers participated in the focus group.

The Albany Housing Authority's focus group with low-income renters was held via Zoom, and residents could attend online or by phone. During the focus group, the facilitator provided an explanation of the Analysis of Impediments to Fair Housing Choice and led an in-depth discussion of fair and affordable housing needs, neighborhood conditions, and access to resources and opportunity in Albany, with a focus on the experiences of housing authority residents. Two public housing residents attended the focus group.

The Columbus Organization Focus Group

Thursday, January 28, 2021

10:00 AM

Albany Housing Authority Focus Group

Friday, March 5, 2021

2:00 PM

Organizational Survey

A final method for obtaining community input was a 4-question survey available to the homeless individuals receiving services from the Salvation Army. The survey was available in paper format in early March 2021. A total of 5 survey responses were received.

Public Comment Period and Hearing

The City of Albany will hold a public comment period to receive input on the draft Analysis of Impediments during the spring of 2021. All comments received on the draft will be appended to the final plan.

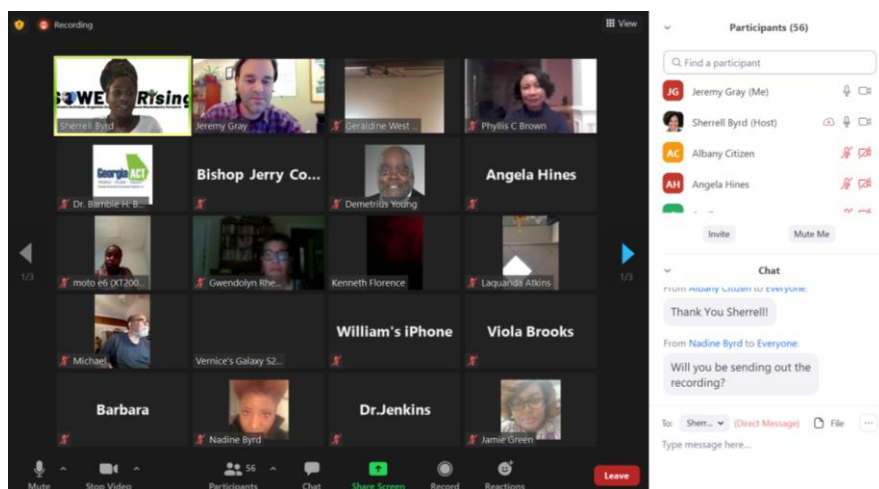
Community Engagement Results

Comments from interviews and meetings and the results of the community survey are summarized below. All comments and surveys were accepted and input was considered in the development of this AI. Note that these comments do not necessarily reflect the views of the City of Albany or Mosaic Community Planning.

Interview, Public Meeting, and Focus Group Results

1. What types of housing needs are greatest in Albany? Are there parts of the city where the need is greater than others?

- More housing in good condition. Many available houses are not up to code, are not weatherized properly, contain mold, lead, or asbestos, have been ravaged by natural disasters, and appear dilapidated, stakeholders note.
- Rehab of structurally sound homes.
- Energy efficient housing. Stakeholders note that due to poor weatherization, many residents have high utility rates. These rates can reach \$1,200 per month. Some stakeholders are also interested in solar paneling to reduce utility bills.
- Programs to improve accessibility in senior residences. More accessible housing in accessible neighborhoods.
- Investment in homeownership. Stakeholders note that with lower numbers of homeowners, the tax base decreases, reducing the city's ability to address other issues. They also state that homeowners will take better care of their properties. One participant recommended mortgage subsidies for at least one year. Some stakeholders have argued that the city has placed too much emphasis on renter resources. Public meeting participants suggested rent to own housing options for 1st time homebuyers.
- Transitional programs for persons leaving nursing homes, hospitals and jails and returning to the community.
- Housing counseling to help applicants navigate the homebuying process as well as assistance with financing a home.
- Additional vouchers for extended stay hotels. While Open Arms offers these vouchers, recipients must be on the verge of eviction or already evicted. The voucher lasts for 90 days.



- Additional shelters for victims of domestic violence. Residents noted that when the local shelters were full, parents had to take children out of their school district to receive services.
- A halfway house for men coming out of prison. The residents note that persons released from prison need a temporary address as well as mentoring and reentry services.
- A “Know Before You Move” program that alerts future renters to slumlords in the city.

Barriers to Affordable Housing Development

- Barriers to housing choice include:
 - High utility rates, which sometimes exceed the cost of the rent/mortgage.
 - Poor housing quality
 - Housing located in the floodplain (which triggers high property insurance rates/requirements to elevate the structure)
 - Income inequality
 - Low credit scores
 - Old rental housing stock
 - Limited life experience/education
 - Lack of familial networks in new neighborhoods
 - Applicants’ fear or perception that they will not receive equal treatment (thus preventing them from applying for a lease/mortgage).

2. What are the greatest Community Development needs in Albany?

- Senior instruction on computers. Many older residents are raising their grandchildren and need to be able to help their grandchildren with homework.
- Parks in all areas. Residents noted that available parks were usually across town.
- Recreation programs.
- A community center that offers activities and snacks.
- Fixing the large number of potholes on the south side.
- Sidewalks on the southside. One resident noted that due to a lack of sidewalks, a child was killed walking to school. However, the north and west sides of the city had better services and roads.
- A 24-hr transportation system.
- Workforce development
- Parental education
- Public health education
- Energy efficiency programs (to include the installation of solar panels)
- Affordable financial planning services and assistance for families living slightly above the poverty line.
- The greatest public facility needs included a one-stop shop for service organizations (which would offer intake and action plans)
- A 24-hr recreation/youth center, and more cultural and historic preservation through resources like the African American History Museum and Ritz Cultural Center.
- Some public/private facility needs included a youth center outside of the Boys and Girls Club,
- A home for special needs adults

- A community shelter.
- Privately-owned community resources were also in great need, as participants noted a need for grocery stores, health clinics, sickle cell clinics, and Black maternal health centers.
- Streetlights on the south side of Albany
- Road repair in low-income areas
- Sidewalks on the south and east side
- Better broadband and internet services.
- Utility relief, with higher regulation of utility bills (including electricity)
- Code enforcement activity
- Attracting better businesses and higher paying jobs.

3. What parts of Albany are generally seen as areas of opportunity? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

Areas of opportunity identified by stakeholders include northwest Albany, and the west side near the mall. Participants also report significant development in Lee County. On the other hand, stakeholders note that job opportunities are available on the east side (e.g. Proctor and Gamble, Albany State University, Miller Brewing, etc.)

4. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choice? Are you aware of any housing discrimination?

- Examples of housing discrimination, as identified by stakeholders, include:
 - Long waiting lists for the housing authority
 - Difficulty for minorities to get financing to purchase a home. Race is noted as a major factor.
 - Prohibiting public housing residents from qualifying for the Section 8 program. Residents noted that this new policy essentially required residents give up their public housing prior to applying for Section 8.
 - Steering white homebuyers away from Albany to Lee County
 - Discrimination based on familial status exists.

5. Are people in Albany segregated in where they live? What causes segregation to occur?

Segregation occurs in Albany due to historical and economic factors, stakeholders note. They report that historically some residents may not have been able to obtain home loans except in low lying or manufacturing areas. While segregation has decreased since the 1980s, desegregation has occurred as black residents have moved to the northwest, they note. At the same time, many white residents have been moving to Lee County. Residents in the north and west pay half the utility rates of residents in the east and south. Stakeholders note some hostility as residents compare Albany to Lee County (in terms of schools, crime, etc.). White residents may be steered to Lee County and away from Albany based on perceptions about schools and crime. Many people travel to Albany for work (e.g. at Phoebe hospital) but live elsewhere.

6. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? Who offers them? How well are they coordinated with the work of other organizations in the community?

Stakeholders report that fair housing services in the city can be found through the city’s Economic and Community Development Department and Georgia Legal Aid.

7. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in the city? Do some areas get more/less than their share?

Stakeholders report that public resources are not evenly available in the city. They note that the more “affluent” communities have amenities, parks, sidewalks, garbage pickup, fewer potholes, speed bumps, and bike trails. East

and South Albany neighborhoods lack many resources, including sidewalks, adequate garbage pickup, pothole repair, speed bumps, rec centers, benches at bus stops, well-maintained parks, and street lighting in some areas. Black neighborhoods generally do not have grocery stores but have liquor stores, they report. Some participants noted that police patrol was higher in east and south Albany. At the same time, other stakeholders stated that services appeared to be even across the city.

Homeless Needs Survey

The homeless needs survey, offered at the Salvation Army, asked service recipients about their housing and service needs. The survey asked participants to prioritize their needs, as well as highlight strengths and gaps in the city’s service delivery system. Five people responded to the survey.

Respondents’ Thoughts about Housing

- The greatest housing/shelter needs for people experiencing homelessness were identified as: hot meals consisting of healthy food, a warm place to sleep, employment, and affordable housing.

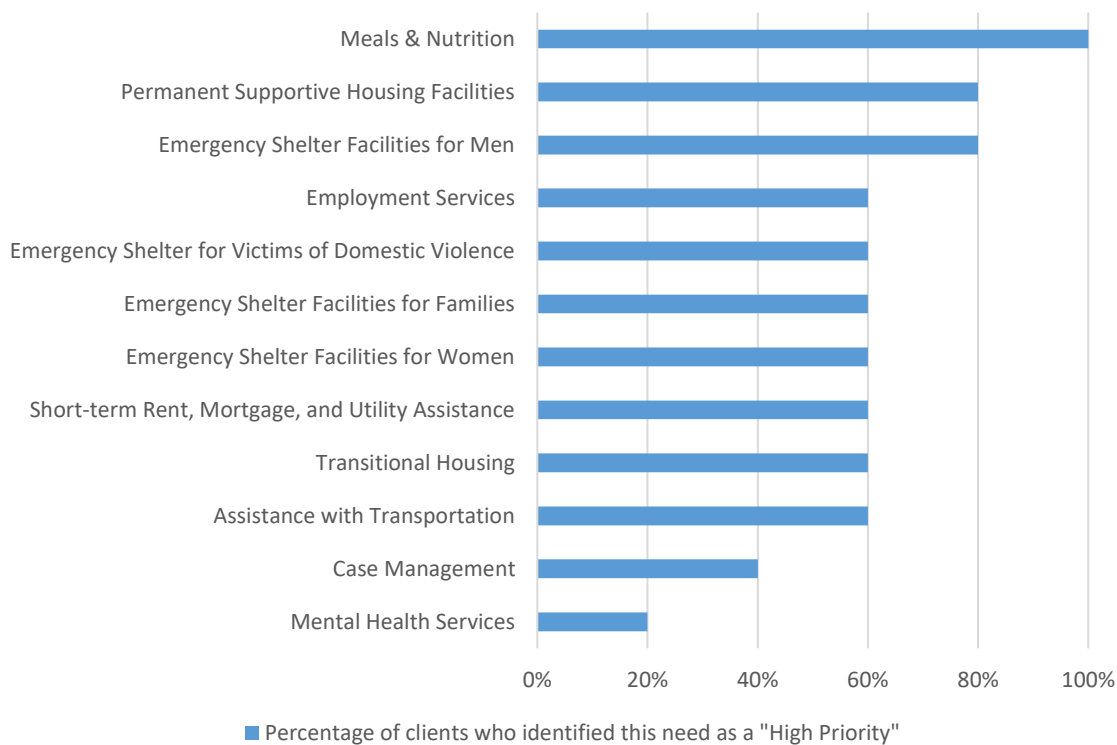
Respondents’ Thoughts about Supportive Service Needs

- The greatest supportive service needs for people experiencing homelessness were identified as: education to learn a skill or trade, fairness in the judicial system, employment, money, healthy food, transportation, and important personal documents such as birth certificates.

Priority needs based on CDBG-eligible funding activities

Below is ranked list of high priority needs identified by participants in the homeless needs survey.

High Priority Needs



Respondents’ Thoughts about the Current Service Delivery System

- When considering the city’s current service delivery system, survey participants identified several strengths in the system including housing/transitional housing, nutrition, the Hope Center. Survey participants also identified several service gaps, including poor communication and follow-through, long wait times to

receive services, lack of health services, lack of discount bus passes, and that services are unavailable to individuals working inflexible schedules.

Chapter 3. Socioeconomic Profile

According to the 2014-2018 5-Year American Community Survey (ACS), the estimated population of the city of Albany is 74,631. Albany's population accounts for nearly half of the population in the Albany MSA (153,101), which includes Baker, Dougherty, Lee, Terrell, and Worth counties. The city of Albany has experienced a 3.5% decline in population since 2010. The region's population also declined slightly, but at a negligible rate of 0.4% during the same period.

Demographic Profile

Race and Ethnicity

Non-Hispanic Black residents comprise the largest racial or ethnic group in the city of Albany and represent nearly three-quarters (73.3%) of the city's total population. The city's Black population experienced steady growth and expanded by 10.3% in population share since 2000. Non-Hispanic White residents make up the second largest racial or ethnic group accounting for 21.5% of the city's population currently, but experienced a sharp decline in population (-40.0%) and population share (-13.1%) since 2000.

Hispanic or Latino residents, the third largest racial or ethnic group in Albany, comprise just 2.3% of all residents. Although comprising a small percentage of the population, the Hispanic population experienced an 80.3% increase in absolute numbers since 2000. No other racial or ethnic group makes up more than 2% of the city's population with the next largest group, mixed race residents, representing 1.6% of all residents. The Asian or Pacific Islander population represents less than 1% of the city's population, but also experienced significant growth in numbers peaking in 2010 until following the city's overall pattern of population decline in the past decade. Population and share of Native American residents have remained stagnant hovering around 200 residents and the current 0.2% share size.

The proportions of Black and white residents are more balanced among the Albany MSA population. Black residents in the MSA maintain the majority with a population share of 52.8%, however, the white population comprise a much larger segment of the MSA population (41.4%) compared to the city of Albany. The racial and ethnic composition of non-white and non-Black residents in the Albany MSA are relatively similar to that of the city. Hispanic and Asian or Pacific Islander and residents comprise slightly larger population shares, 2.7% and 1.3%, respectively, of the MSA population. Population shares of multiracial and Native American populations are nearly identical between the city and the MSA.

Demographic changes among white and Black populations in the Albany MSA between 2000 and 2018 followed the general patterns of growth and decline of racial and ethnic groups in the city. Compared to the drastic 40% population loss of white residents in the city, the white population in the MSA declined by just 15.7%. The growth rate of the Black population (8.0%) during the same period was also slightly more subdued in the MSA when compared to the city. Hispanic and Asian populations in the MSA expanded at faster rates compared to the city. Contrary to other groups, the rate of population loss of Native Americans (-53.6%) was nearly double that of the city's population.

National Origin

The 2014-2018 5-Year ACS estimates the city of Albany houses of 1,290 foreign-born residents. The foreign-born population experienced an increase of 37.4% between 2000 and 2010, however, the current population is similar in size to the foreign-born population recorded in the 2000 Decennial Census. The top countries of origin of the foreign-born population in Jefferson County are Mexico, India, Ghana, Korea, and the Philippines. The populations originating from Mexico is the largest comprising 0.4% of the total population. Residents from India comprise the next largest group accounting for 0.3% of the population. The other three countries each account for 0.1% of the total population.

In both the city and the MSA, the most common country of origin for the foreign-born population is Mexico, followed by India. Population shares are also identical for the two largest foreign-born populations. The third and fourth largest foreign-born populations in the MSA, residents from Guatemala and China, differ from the city, however, residents from the Philippines comprise the fifth largest foreign-born population in the MSA as in the city.

Limited English Proficiency (LEP)

Population dynamics for residents with limited English Proficiency (LEP) often resemble those of foreign-born residents in a community. Contrary to the changes in the foreign-born population, the LEP population declined between 2000 and 2010, but has rebounded currently to a population size similar to what was recorded in 2000.

Coinciding with the origins of the foreign-born population, the largest LEP population in both the city and the region speak Spanish and each account for almost 1% of the total population. Other common languages of the LEP population in both the city and MSA include languages spoken in India like Hindi, Gujarati, and Urdu. French Creole, Vietnamese, and Arabic are the remaining top languages spoken by the LEP population.

Disability

Residents with a disability comprise around 15% of the population in both the city of Albany and the Albany MSA. The city and the MSA also share very similar distribution patterns by disability type. The most common disability type is difficulty with ambulatory movement, comprising around 10% of the population in both the city and the region. Disabilities that typically require more extensive assistance such as difficulties with independent living or self-care make up around 5% and 3% of the population, respectively, in both the city and the region. Approximately 6% of the population in the city and MSA have a cognitive difficulty and sensory disabilities such as hearing and vision difficulties impact around 3% of the population in both the city and the MSA.

Age

The age distribution in the city of Albany and the Albany MSA are very similar and follow normal distribution patterns. The majority of the population (60%) are between the ages of 18 and 64 in both the city and the MSA. Slightly less than one-quarter of the city and MSA population is under age 18. The proportions of residents over the age of 65 have the largest discrepancy between city (15.1%) and MSA (17.0%). The shifts in population share between 2000 and 2018 indicate an aging population in both the city and the MSA. The share of residents over the age of 65 grew from 12.2% to 15.1% of the city's total population. The growth rate of this same age group was faster in the MSA expanding from 11.1% in 2000 to 17.0% in 2018.

Sex

Female residents make up the majority of the population in the city of Albany comprising 54.7% of the population. Compared to the city, gender distribution of the Albany MSA is slightly more balanced between female (52.7%) and male populations (47.3%). There have not been significant fluctuations among these distribution patterns since 2000.

Family Type

In the city of Albany, 31.3% of households have children. The share of households with children is slightly larger (32.9%) in the MSA. In both the city and the MSA, the share of households with children declined slightly from around 48% in 2000 to current levels. The share of married couples with no children is larger in the MSA (24.8%) compared to the city (17.7%) Another significant discrepancy in share size is found among female householders in non-family households where 23.6% of non-family households in the city have a female householder compared to just 18.5% in the MSA.



Table 1. Demographic Overview

Demographic Indicator	City of Albany		Albany MSA			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic or Latino						
White	16,077	21.5%	63,311	41.4%		
Black	54,699	73.3%	80,878	52.8%		
Asian or Pacific Islander	696	0.9%	2,029	1.3%		
Native American	175	0.2%	284	0.2%		
Other Race	51	0.1%	211	0.1%		
Two or More Races	1,213	1.6%	2,255	1.5%		
Hispanic or Latino	4,251	1.9%	12,529	3.2%		
Total Population	74,631	100.00%	153,101	100.00%		
National Origin						
#1 country of origin	Mexico	280	0.4%	Mexico	563	0.4%
#2 country of origin	India	189	0.3%	India	392	0.3%
#3 country of origin	Ghana	80	0.1%	Guatemala	301	0.2%
#4 country of origin	Korea	54	0.1%	China (excl. Hong Kong & Taiwan)	294	0.2%
#5 country of origin	Philippines	53	0.1%	Philippines	254	0.2%
Limited English Proficiency (LEP) Language*						
#1 LEP Language	Spanish or Spanish Creole	656	0.9%	Spanish or Spanish Creole	1,210	0.8%
#2 LEP Language	Hindi	64	0.1%	Gujarati	130	0.1%
#3 LEP Language	French Creole	54	0.1%	Urdu	104	0.1%
#4 LEP Language	Gujarati	49	0.1%	Hindi	64	< 0.1%
#5 LEP Language	Vietnamese	47	0.1%	Arabic	56	< 0.1%

Table 1. Demographic Overview (continued)

Demographic Indicator	City of Albany		Albany MSA	
	#	%	#	%
Age				
Under 18	17,481	24.7%	34,411	23.3%
18-64	42,501	60.2%	87,875	59.6%
65+	10,661	15.1%	25,098	17.0%
Disability Type				
Hearing difficulty	1,913	2.7%	4,960	3.4%
Vision difficulty	2,560	3.6%	4,995	3.4%
Cognitive difficulty	4,846	6.9%	9,125	6.2%
Ambulatory difficulty	6,905	9.8%	14,775	10.0%
Self-care difficulty	2,302	3.3%	4,650	3.2%
Independent living difficulty	3,718	5.3%	7,047	4.8%
Total Population with a disability	11,126	15.7%	22,453	15.2%
Sex				
Male	31,993	45.3%	69,726	47.3%
Female	38,650	54.7%	77,658	52.7%
Household Type				
Family Households				
Married Couple, Children	2,634	9.2%	8,632	14.9%
Female Householder, Children	5,410	18.8%	8,725	15.1%
Male Householder, Children	950	3.3%	1,679	2.9%
Married Couple, No Children	5,083	17.7%	14,321	24.8%
Female Householder, No Children	2,339	8.1%	4,098	7.1%
Male Householder, No Children	487	1.7%	955	1.7%

Table 1. Demographic Overview (continued)

Demographic Indicator	City of Albany		Albany MSA	
	#	%	#	%
Non-Family Households				
Female Householder	6,773	23.6%	10,711	18.5%
Male Householder	5,065	17.6%	8,683	15.0%
Total Households	28,741	100.0%	57,804	100.0%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

Data Sources: 2014-2018 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, and B11005; 2011-2015 5-Year American Community Survey, Table B16001

Table 2. Demographic Trends

Demographic Indicator	2000		2010	
	#	%	#	%
City of Albany				
Race/Ethnicity				
White, Non-Hispanic	26,774	34.6%	20,549	26.6%
Black, Non-Hispanic	48,738	63.0%	54,131	70.0%
Hispanic	954	1.2%	1,611	2.1%
Asian or Pacific Islander, Non-Hispanic	540	0.7%	769	1.0%
Native American, Non-Hispanic	240	0.3%	239	0.3%
National Origin				
Foreign-born	1,255	1.6%	1,724	2.2%
Limited English Proficiency				
Limited English proficiency	1,240	1.6%	979	1.3%
Age				
Under 18	21,907	28.3%	20,186	26.1%
18-64	45,985	59.5%	48,062	62.1%
65+	9,424	12.2%	9,129	11.8%
Sex				
Male	35,829	46.3%	35,667	46.1%
Female	41,487	53.7%	41,710	53.9%
Household Type				
Families with children	7,702	48.1%	8,628	45.9%
Households with female householders	14,605	19.0%	16,864	21.8%
Albany Region				
Race/Ethnicity				
White, Non-Hispanic	75,091	48.8%	67,178	43.7%
Black, Non-Hispanic	74,906	48.7%	81,050	52.7%
Hispanic	1,962	1.3%	3,125	2.0%
Asian or Pacific Islander, Non-Hispanic	1,013	0.7%	1,769	1.2%
Native American, Non-Hispanic	612	0.4%	594	0.4%
National Origin				
Foreign-born	2,473	1.6%	3,233	2.1%
Limited English Proficiency				
Limited English proficiency	1,937	1.3%	2,035	1.3%

Table 2. Demographic Trends (Continued)

Demographic Indicator	2000		2010	
	#	%	#	%
Albany Region (continued)				
Age				
Under 18	44,692	29.1%	39,916	25.9%
18-64	92,065	59.9%	95,608	62.1%
65+	17,002	11.1%	18,333	11.9%
Sex				
Male	72,909	47.4%	72,900	47.4%
Female	80,850	52.6%	80,957	52.6%
Household Type				
Households with children	15,966	48.8%	17,583	44.4%
Households with female householders	N/A	N/A	28,506	18.1%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: U.S. Census 2000 SF1 Tables P008, P012, P027 and P035, U.S. Census 2010 SF1 Tables P5, P12, P29 and P39

Racially and Ethnically Concentrated Areas of Poverty

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdictions' most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁴ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁵

There are currently 10 census tracts (2, 8, 10, 11, 14.03, 15, 103.02, 106.01, 107, and 114) that are designated as R/ECAP in the city of Albany. R/ECAP census tracts are generally located in central neighborhoods of Albany. The population residing in R/ECAP census tracts in Albany is 33,093, which accounts for 44.3% of the city's total population. The Black population accounts for a significant majority (91.7%) of the population in R/ECAP

⁴ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁵ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

communities. The discrepancy between population share of Black residents in the R/ECAP census tracts and the city as a whole (18.3%) and the Albany MSA (38.9%) clearly indicates disproportionate representation of the Black residents in these communities. All other racial and ethnic groups comprise smaller shares of the R/ECAP population than their shares of the population in each jurisdiction.

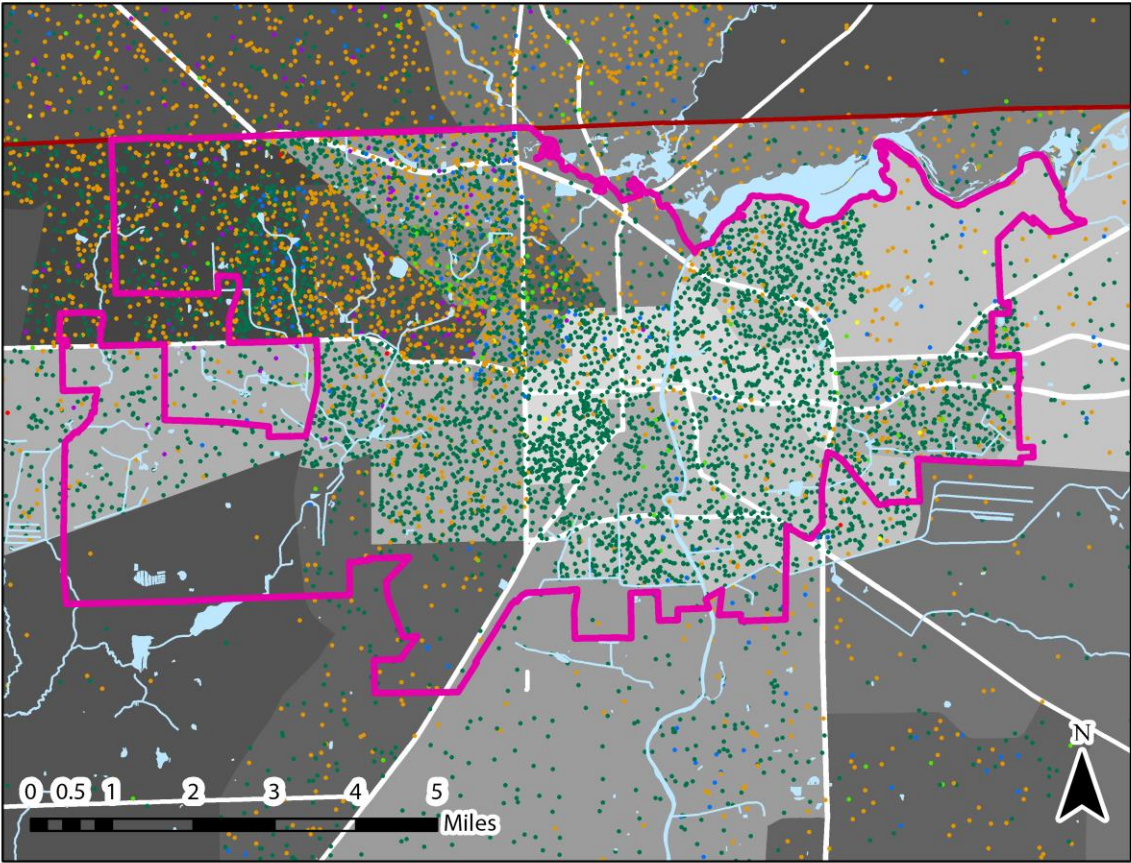
Figure XX categorizes census tracts by percentage of population below poverty level and population distribution patterns by race and ethnicity throughout Albany. Census tracts with the highest percentage of residents below the poverty line are located in the central and eastern regions of the city where Black residents comprise the majority. Conversely, census tracts with the lowest percentage of residents below the poverty line are located in the northwest and southwest quadrants of the city. The racial and ethnic composition of the in the low poverty areas seem diverse, however, there are clear indications of racial and ethnic segregation and spatial patterns to suggest white and Asian populations almost exclusively reside in low poverty census tracts.

Foreign-born populations in Albany mostly reside in the northwest quadrant of the city where the percentage of residents below the poverty line is lowest. Residents from Ghana, Korea, and the Philippines exclusively reside in census tracts with the lowest percentage of population below the poverty line. Residents from India are also isolated to just a couple of census tracts, however, these census tracts have slightly higher percentages of residents below the poverty line. Residents from Mexico are the most varied in both location and exposure to poverty by census tract. Significant clusters of Mexican residents are located in a census tract with the lowest and highest levels of poverty among the population.

Demographic Indicator	City of Albany RECAP Tracts	
	#	%
Race/Ethnicity		
Total Population in RECAPs	33,093	-
White, Non-Hispanic	2,072	6.3%
Black or African American, Non-Hispanic	30,355	91.7%
Hispanic	275	0.8%
Asian or Pacific Islander, Non-Hispanic	38	< 0.1%
Native American, Non-Hispanic	55	< 0.1%
Other, Non-Hispanic	24	< 0.1%

Data Sources: 2014-2018 5-Year American Community Survey, Tables B03002, B17001, and B05006

Poverty + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

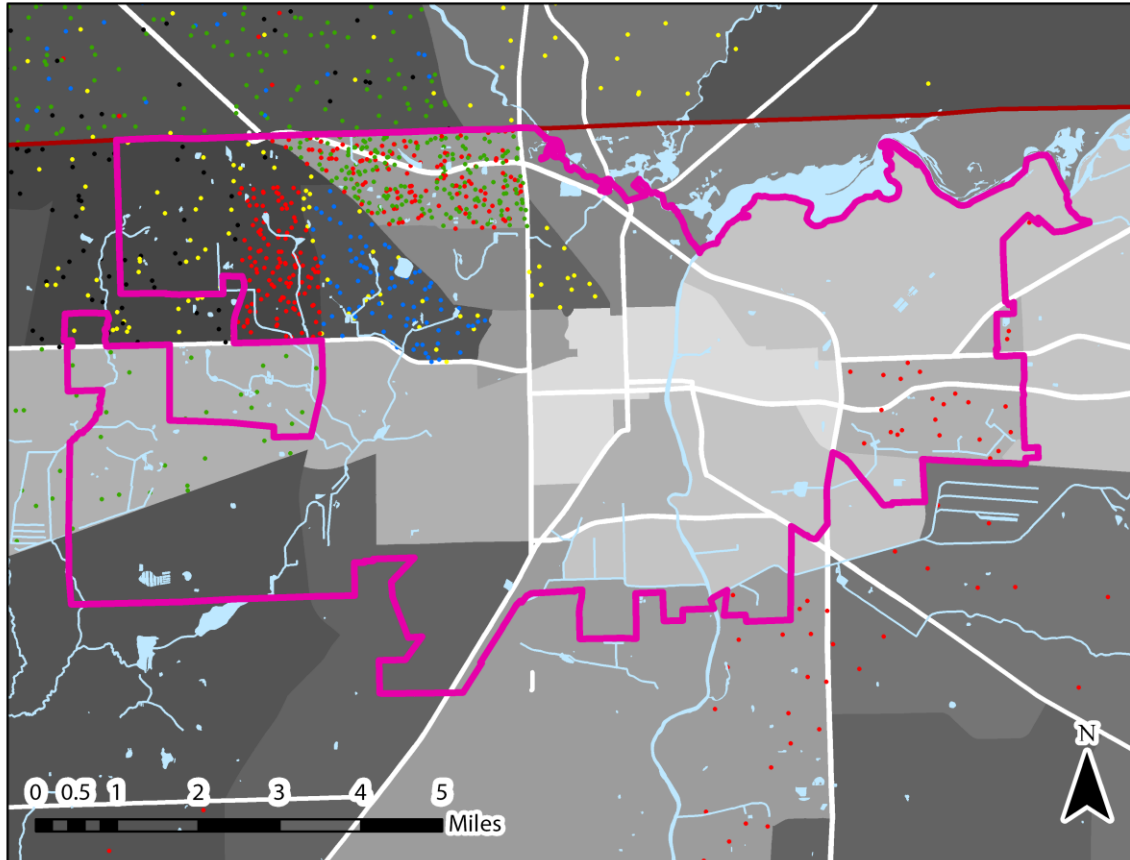
Percent of Population Below Poverty Level in Past 12 Months



Race + Ethnicity

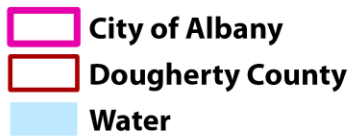


Poverty + National Origin



Source: American Community Survey 5-Year Estimates, 2015-2019

Percent of Population Below Poverty Level in Past 12 Months



National Origin (Top 5 Most Populous)



Chapter 4. Segregation and Integration

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

Race and Ethnicity

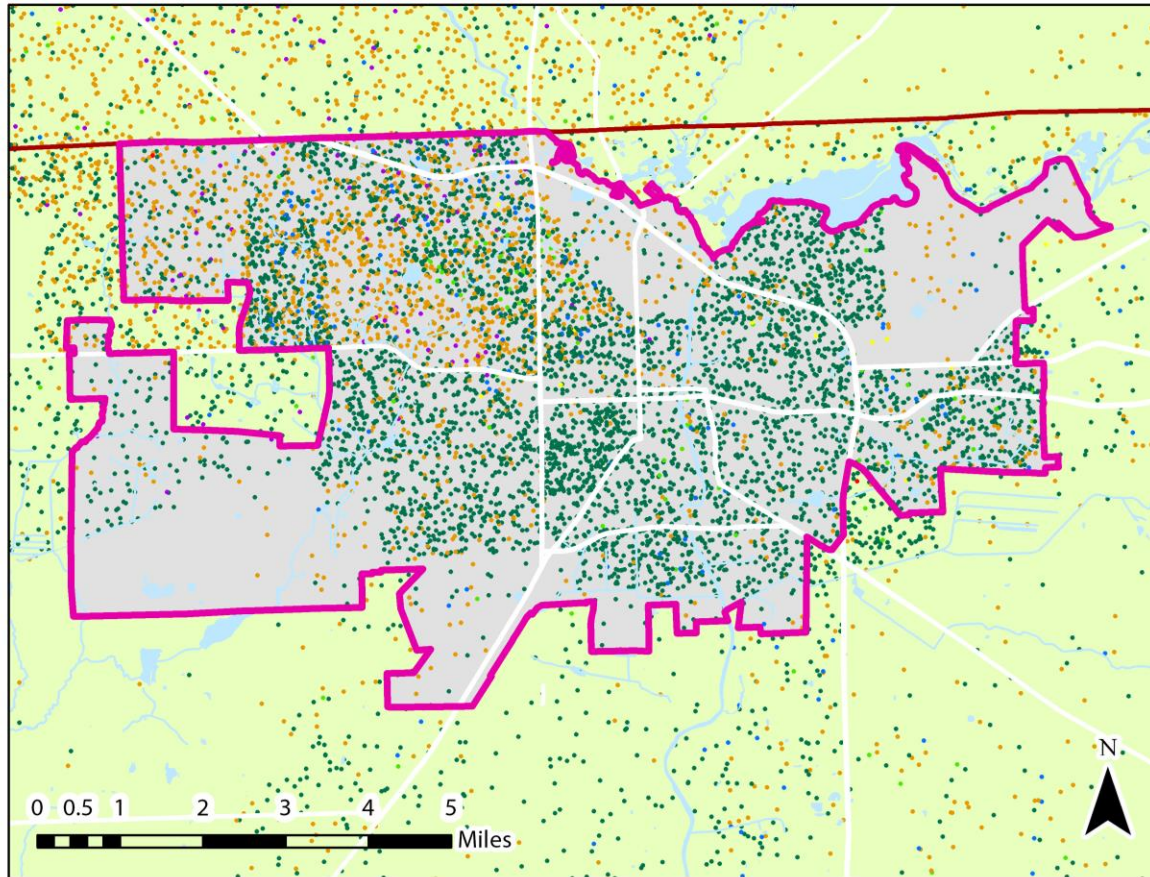
Figures 7 through 9 map Albany's population by race and ethnicity using 2000 and 2010 Census data and the 2015-2019 5-Year American Community Survey. Overall population is distributed evenly throughout the city with some indication that residential density is highest in central neighborhoods. Population distribution patterns by race and ethnicity throughout Albany show strong patterns of residential segregation between white and Black populations. Historic data indicates a significant decrease in white populations since 2000 with slight shifts in geographic distribution of racial and ethnic groups over the same time period.

There are strong patterns shown in Figures 7 to 9 that indicate high levels of segregation between white and Black populations in Albany since 2000. Population distribution patterns by race and ethnicity show a strong concentration of white residents in the northwest quadrant of the city. Spatial patterns over time also suggest a significant decrease in the white population with more racial integration, however, there are neighborhoods in the northwest quadrant that continue to exhibit patterns of segregation. Residential patterns of the Black population throughout Albany indicate a mostly homogeneous population throughout the city. There is no visual indication of a significant shift in spatial distribution by race or ethnicity outside of the northwest quadrant of the city.

⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

Figure 1. Population by Race and Ethnicity in Albany, 2014-2018

Race/ Ethnicity, City of Albany, 2015-2019



Source: American Community Survey 5-Year Estimates, 2015-2019

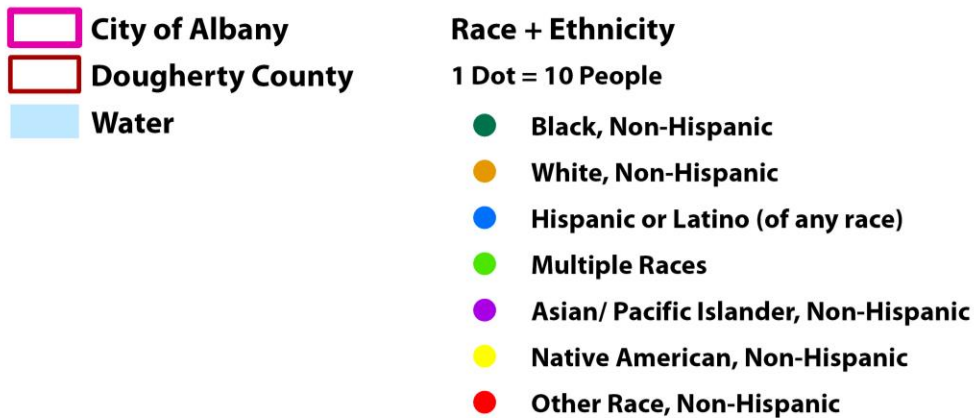
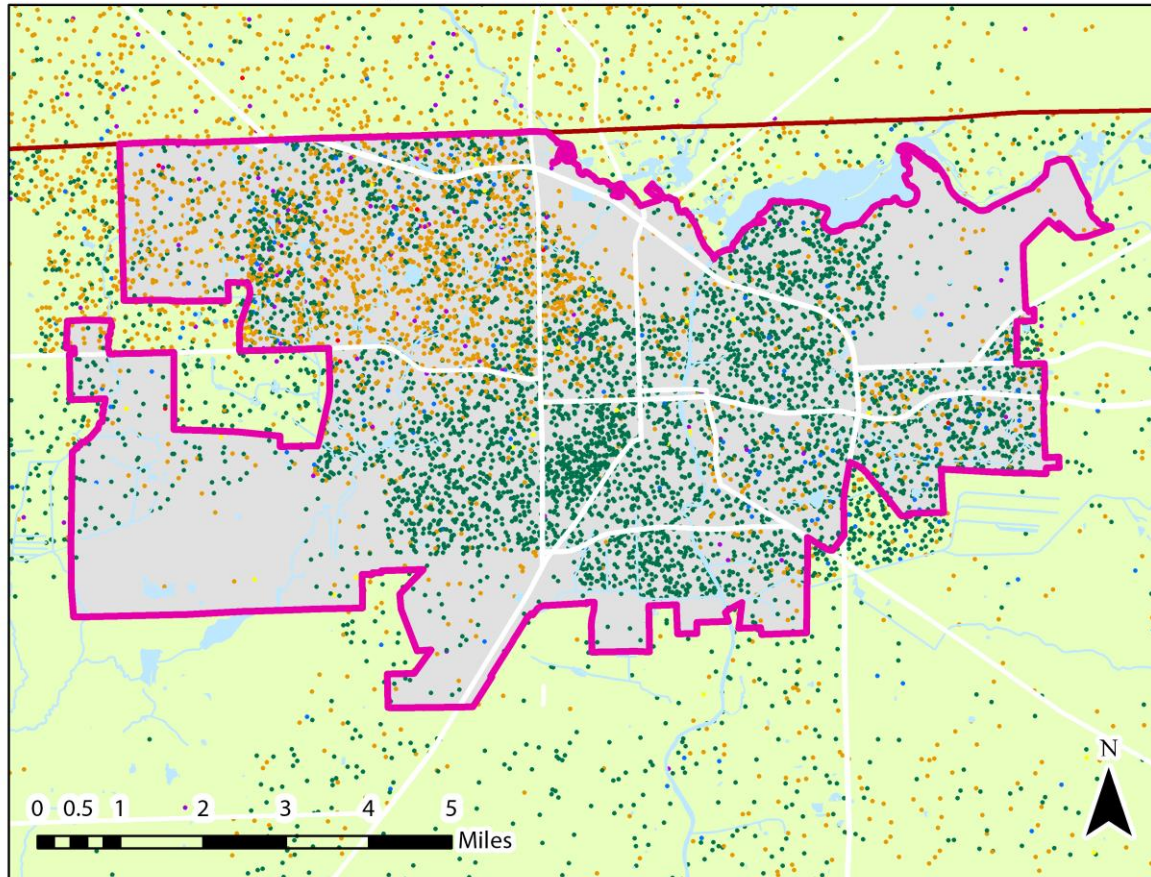





Figure 2. Population by Race and Ethnicity in Albany, 2010

Race/ Ethnicity, City of Albany, 2010



Source: Decennial Census, 2010

-  City of Albany
-  Dougherty County
-  Water

Race + Ethnicity

1 Dot = 10 People







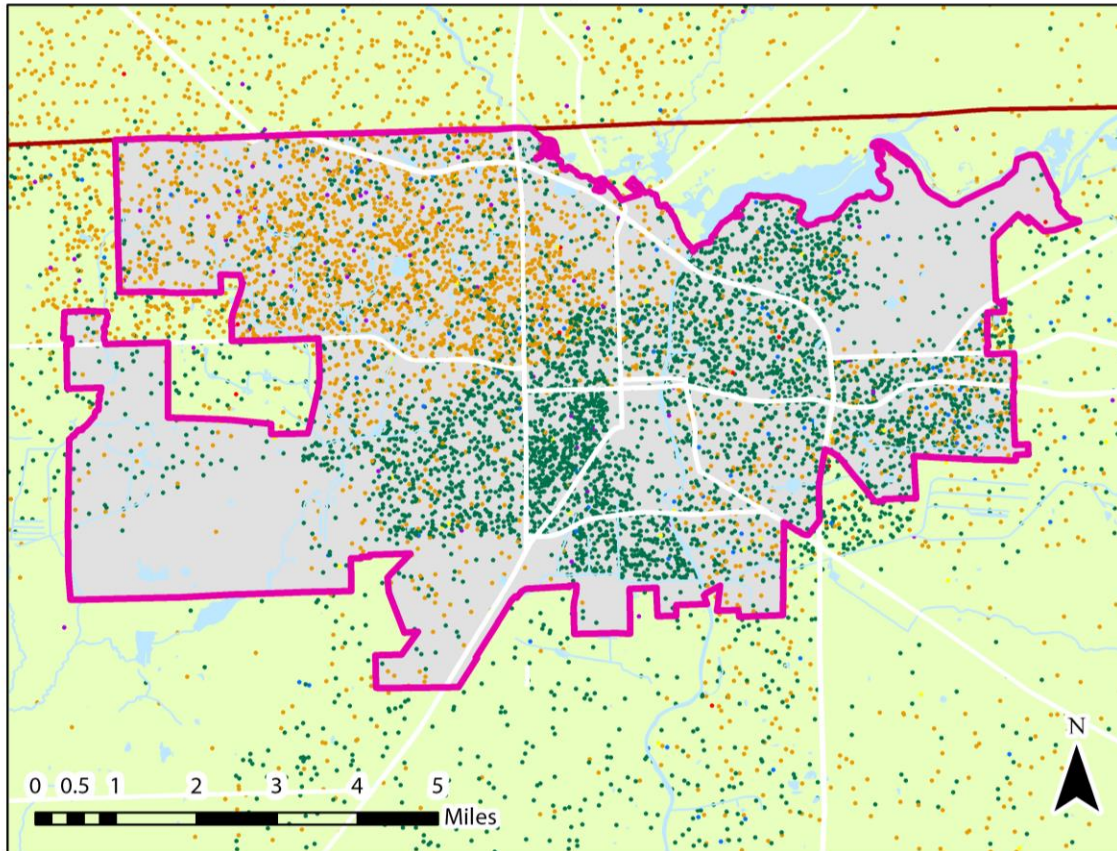
-  Black, Non-Hispanic
-  White, Non-Hispanic
-  Hispanic or Latino (of any race)
-  Asian/ Pacific Islander, Non-Hispanic
-  Native American, Non-Hispanic
-  Other Race, Non-Hispanic

Figure 3. Population by Race and Ethnicity in Albany, 2000

Race/ Ethnicity, City of Albany, 2000



Source: Decennial Census, 2000



Segregation Levels

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. The DI represents the proportion of one group that would have to change their area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for three pairings in Albany. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “block group” figure is calculated using block groups as the area of measurement. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicated slightly higher levels of segregation than tract-level calculations. This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the 2010 figure calculated using block groups.

Table 3. Racial and Ethnic Dissimilarity Index Trends in Albany

Race/Ethnicity	City of Albany			
	1990	2000	2010	Current
Black/White	64.5	62.8	55.5	56.6
Hispanic/White	32.7	35.4	41.1	42.3
Asian or Pacific Islander/White	24.7	19.2	31.1	36.2

Data Sources: Decennial Census

The Dissimilarity Indices calculated for each pairing in Albany show high levels of segregation between Black and White populations throughout the period between 1990 and 2010. DI values decreased slightly from 64.5 in 1990 to 55.5 in 2010 indicating decreasing segregation, however, levels of segregation still exceed the threshold to be designated as high segregation. Hispanic/White pairings indicate growing levels of segregation going from low levels of segregation in 1990 to breaching the threshold for moderate segregation in 2010. DI values for Asian or Pacific Islander/White remain low segregation range, but experienced fluctuation unlike the other two pairings.

Block group level analysis of Dissimilarity Indices show slightly higher levels of segregation for all pairings in Albany. Of the three pairings, the most significant difference between census tract and block group level analysis is with the Asian or Pacific Islander/White pairing with an increase of 5.1 points moving the pairing closer to moderate segregation range.

National Origin and Limited English Proficiency Population

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁷ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁸

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.⁹ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹⁰

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

The residential patterns of foreign-born populations in the city of Albany are shown in Figure 10. There are several strong concentrations throughout Albany, particularly in the northwest corner of the city. Residential patterns of people from Mexico show a heavy concentration in the neighborhood north of Gillionville Road and west of Westover Boulevard with looser concentrations on the southeastern corner of the city in the neighborhood below US Highway 82. There is a strong concentration of residents from India in the northwest quadrant in the same neighborhood where a cluster of residents from Mexico reside. Residents from Ghana are also located exclusively in neighborhoods in the northwest corner of the city; however, they do not reside in the same neighborhoods as residents from Mexico and India. Residents originating from Korea are loosely clustered in the farthest northwest corner of the city. Residents from the Philippines reside in looser concentrations in the northwest quadrant and can be found residing in the same neighborhoods as people from Ghana and Korea.

Typically, the geographic distribution of residents with limited English proficiency (LEP) in generally coincides with the locations of the foreign-born population, however, the residential patterns of the largest LEP populations differ from distribution patterns of the foreign-born population. The Spanish-speaking population is the largest among the LEP population and are scattered throughout the city with concentrations east of the Flint River and in the neighborhoods of West Highland and Woodland. Hindi, Gujarati, and Vietnamese speakers live in the northwest quadrant of Albany. French Creole speakers do not coincide with one of the top five foreign-born populations, however, they are the third largest LEP population group and reside exclusively in neighborhoods located in South Albany.

⁷ James, F., Romine, J., & Zwanig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

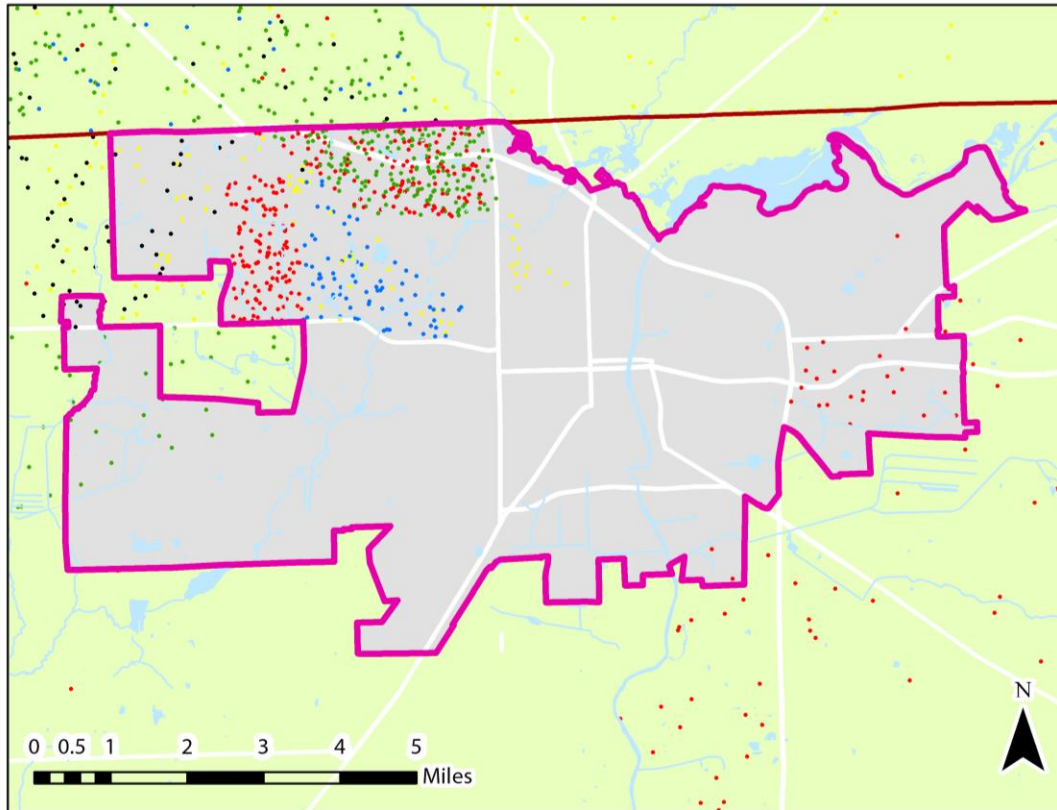
⁸ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

⁹ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹⁰ Golding, E., Goodman, L., & Stochack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

Figure 4. Foreign-Born Population by Nationality in Albany, 2015-2019

National Origin



Source: American Community Survey 5-Year Estimates, 2015-2019

- City of Albany
- Dougherty County
- Water

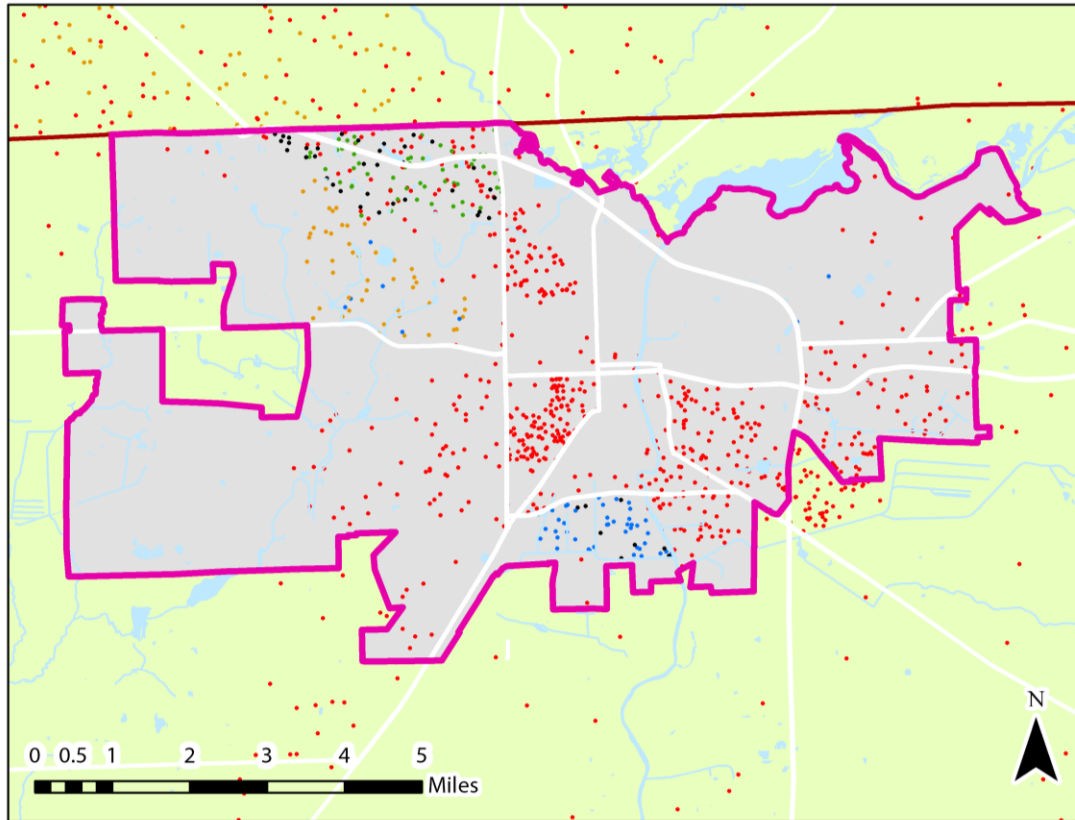
**National Origin
(Top 5 Most Populous)**

1 Dot = 1 Person




- Mexico
- India
- Ghana
- Korea
- Philippines

Figure 5. Population with Limited English Proficiency in Albany, 2015-2019

Population with Limited English Proficiency




Source: American Community Survey, 2011-2015

-  City of Albany
-  Dougherty County
-  Water

LEP Population by Language Spoken (Top 5 Most Populous)

1 Dot = 1 Person

-  Spanish or Spanish Creole
-  Hindi
-  French Creole
-  Gujarati
-  Vietnamese

Chapter 5. Access to Opportunity

Where people live shapes prospects for economic mobility, as well as access to quality education, affordable transportation, a healthy environment, and fresh, affordable food. For protected classes, such as people of color or with disabilities, neighborhood or housing choices are often limited by factors such as discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to proficient schools and jobs that pay a living wage. In this way, limited housing choice reduces access to opportunity for many protected classes.

Proximity is often used to indicate levels of access to opportunity; however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹¹ However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive with improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹²

The strategy to improve access to opportunities has been two-pronged with different housing and community development programs. Tenant-based housing vouchers allow recipients mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

Employment and Workforce Development

Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors--transportation options, the types of jobs available in the area, or the education and training necessary to obtain them--may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. This section analyzes indicators of both labor market engagement and jobs proximity, which, when considered together, offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

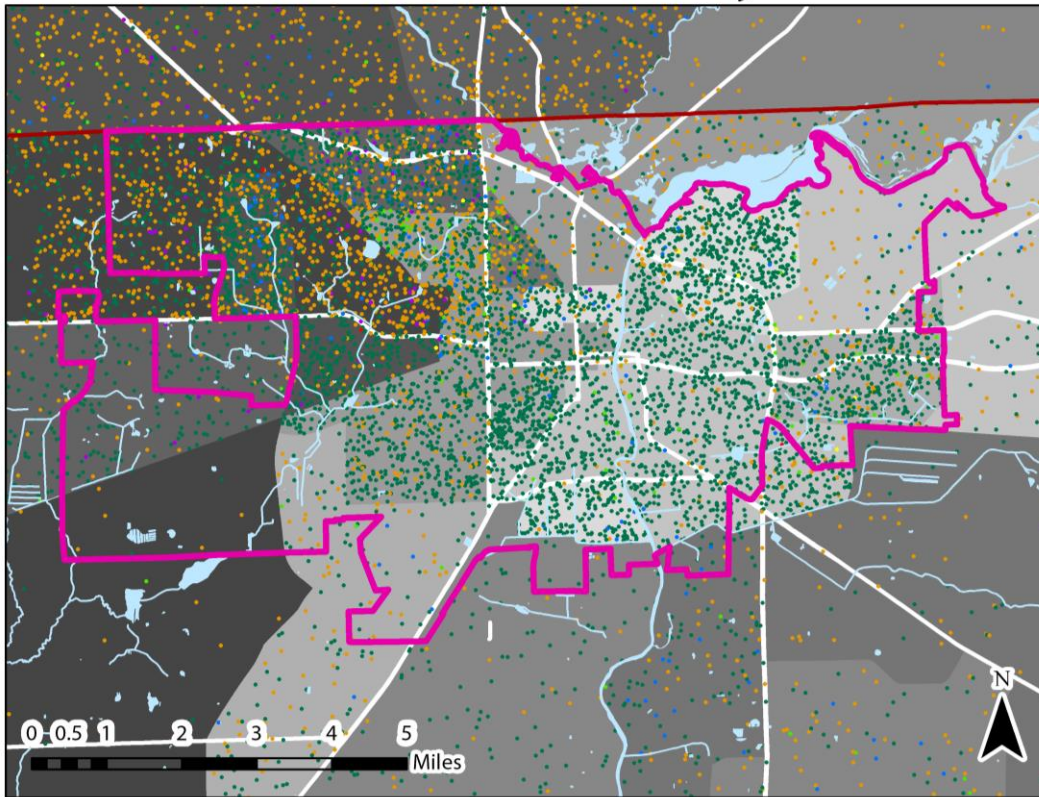
Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In the city of Albany as a whole, 20.0% of residents aged 25 and over hold a bachelor's degree or higher, according to American Community Survey 5-Year Estimates for 2015-2019. Geographic disparities exist, as the percentage of residents with bachelor's degrees or higher ranges from 5.1% to 50.8% across the city's census tracts. Residents in northwest Albany tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in parts of central, south, and east Albany.

11 *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

12 Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

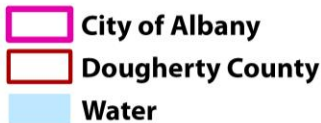
Figure 6. Educational Attainment by Race/ Ethnicity

Educational Attainment + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Percent of Population Aged 25+ with Bachelor's Degree or Higher



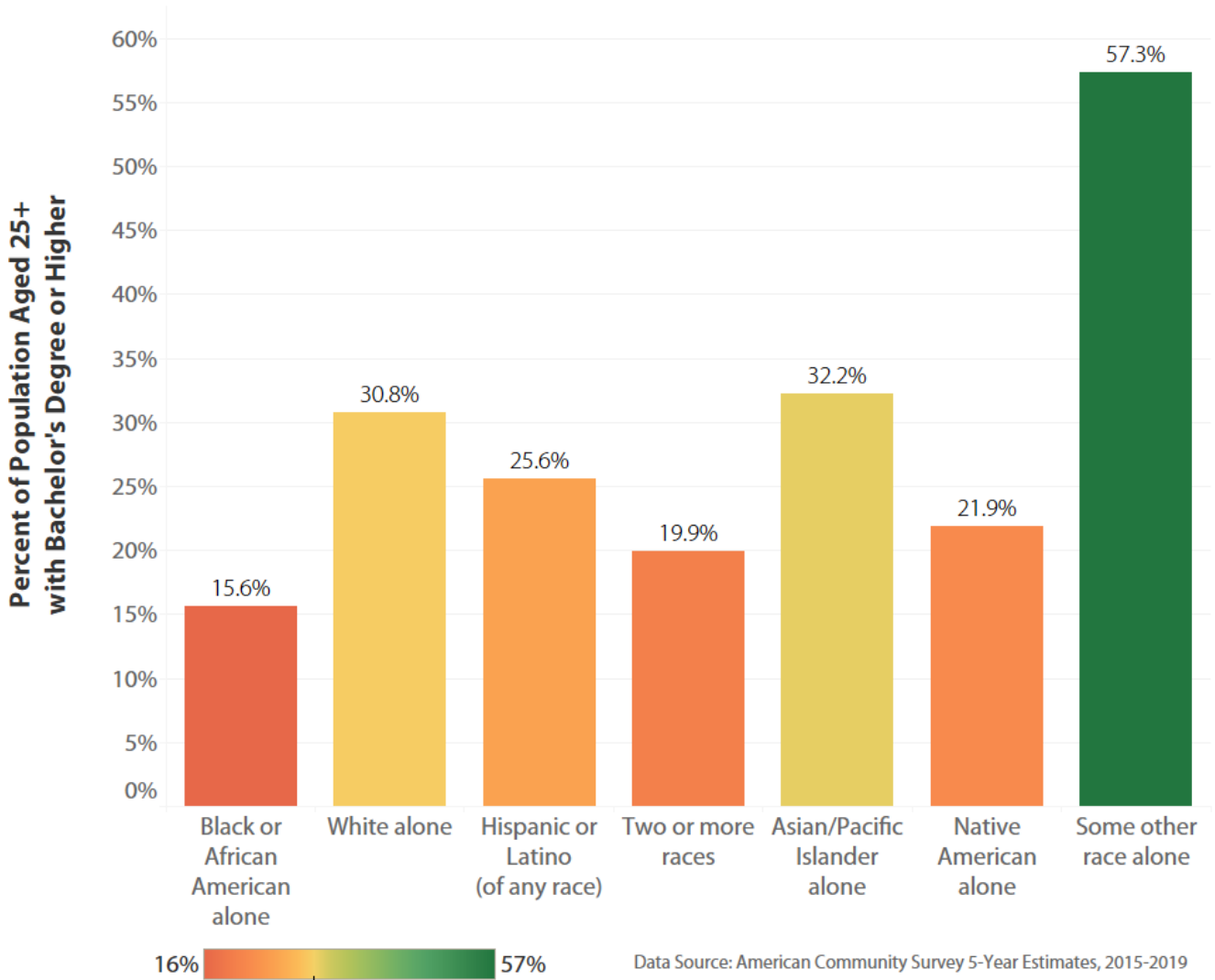
Race + Ethnicity

1 Dot = 10 People



Disparities in educational attainment also exist by race and ethnicity in the city. Residents of some other race alone, Asian or Pacific Islander residents, and white residents tend to have higher levels of educational attainment (57.3%, 32.2% and 30.8% have a bachelor's degree or higher, respectively), while Black residents, residents of two or more races, and Native American residents are least likely to have higher levels of education (15.6%, 19.9% and 21.9% have a bachelor's degree or higher, respectively).

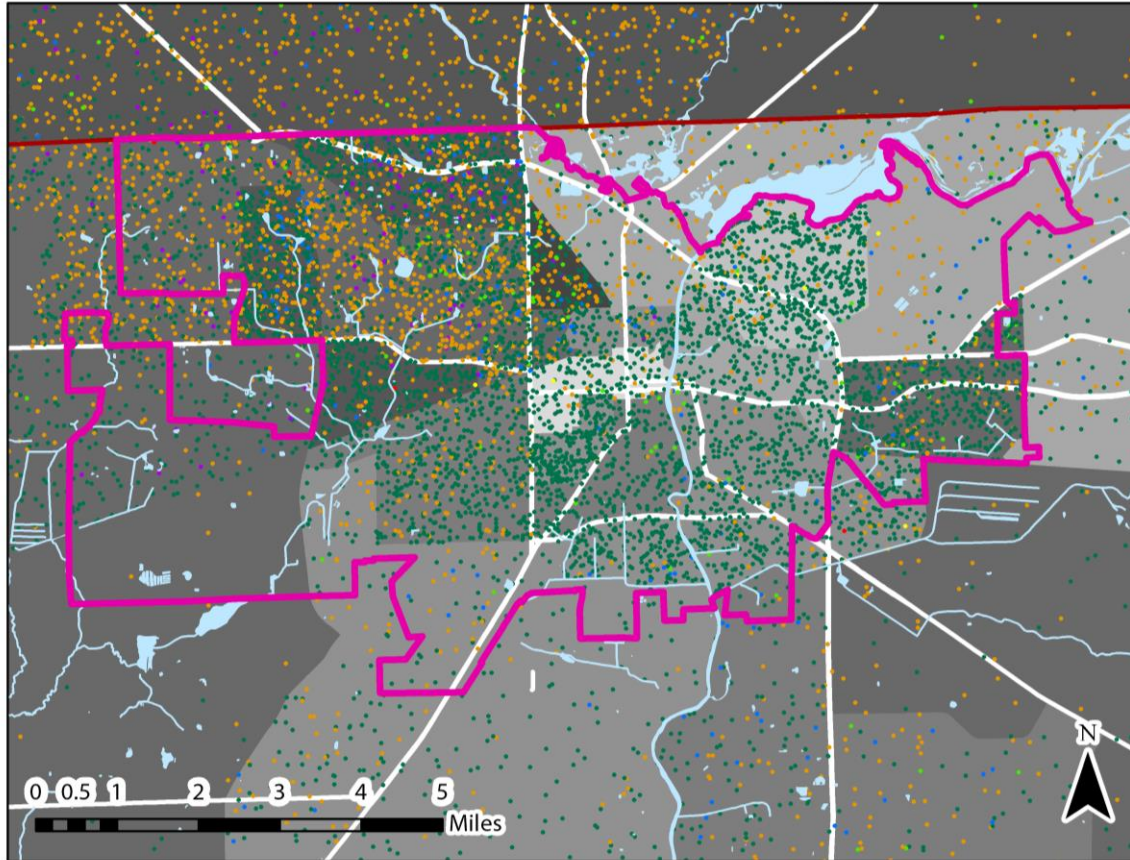
Figure 7. Educational Attainment and Race/Ethnicity, City of Albany



Sixty-eight percent (58.0%) of the population aged 16 and over in Albany participates in the labor force (ACS 5-Year Estimates, 2015-2019). As with educational attainment, geographic disparities exist, with the labor force participation rates ranging from 37.3% to 71.9% in census tracts across the city. Residents in central Albany, including the Enterprise neighborhood, and east Albany tend to participate in the labor force at the lowest levels, while participation tends to be highest in northwest Albany (see Figure 13).

Figure 8. Labor Force Participation and Race/Ethnicity



Labor Force Participation + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Percent of Population Aged 16+ in Labor Force

37% - 40%	55% - 60%
40% - 45%	60% - 65%
45% - 50%	65% - 70%
50% - 55%	70% - 72%

-  City of Albany
-  Dougherty County
-  Water

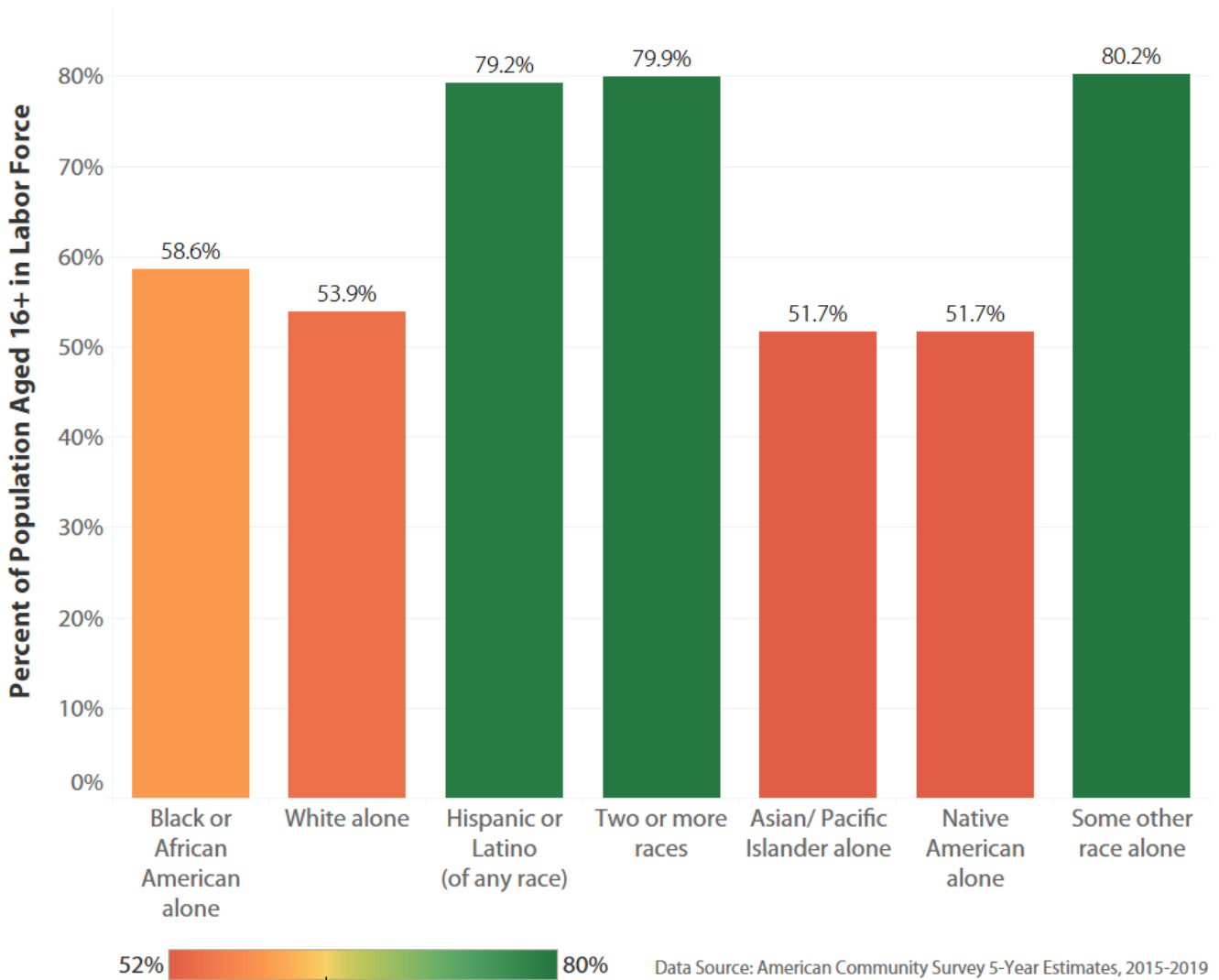
Race + Ethnicity

1 Dot = 10 People

-  Black, Non-Hispanic
-  White, Non-Hispanic
-  Hispanic or Latino (of any race)
-  Multiple Races
-  Asian/ Pacific Islander, Non-Hispanic
-  Native American, Non-Hispanic
-  Other Race, Non-Hispanic

Labor force participation is highest among residents who identify as some other race, two or more races, or Hispanic or Latino origin (of any race), and lowest among residents identifying as Asian or Pacific Islander, Native American, or white (see Figure 14).

Figure 9. Labor Force Participation by Race/ Ethnicity

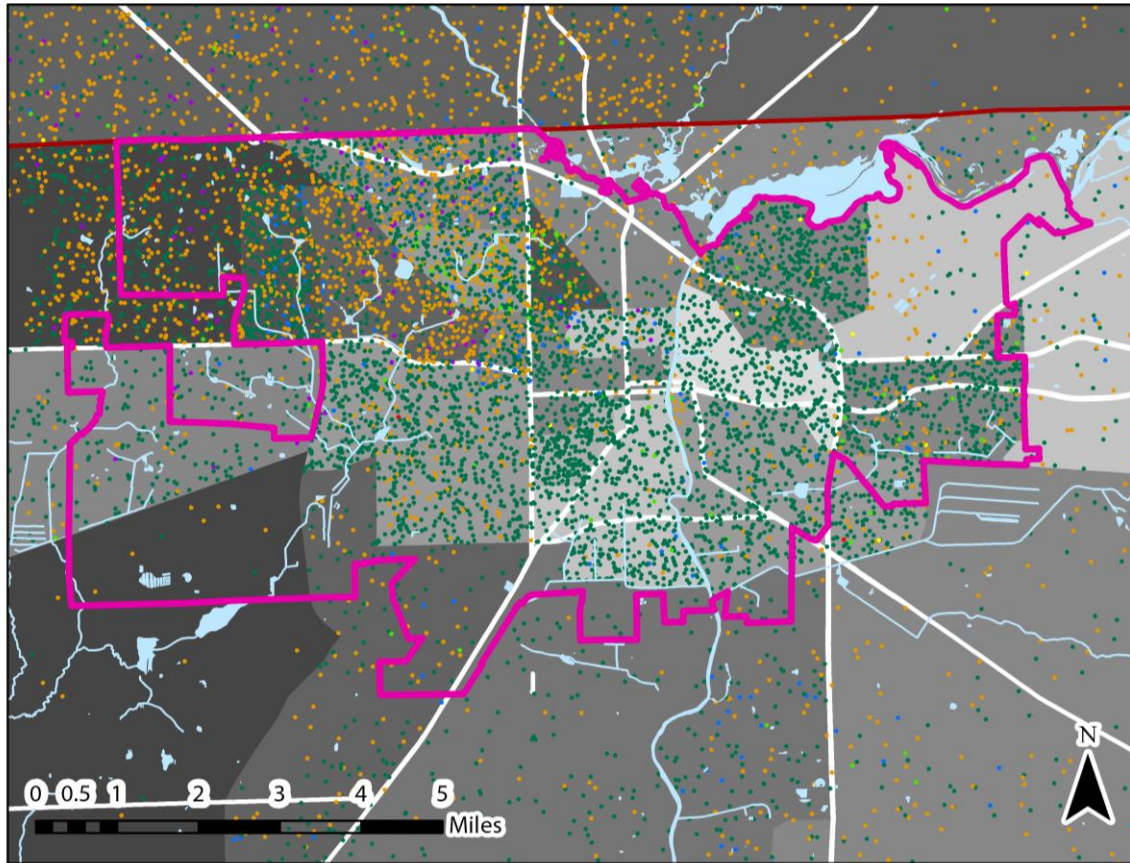


The unemployment rate in the city of Albany as a whole was 13.7% as of the 2015-2019 ACS five-year estimates. More recent data from the Georgia Department of Labor shows the unemployment rate at 8.7% as of December 2020.¹³ As with educational attainment and labor force participation, unemployment varies across the city’s census tracts, ranging from 1.4% in one southwest Albany tract to 43.8% in part of east Albany (see Figure x). Six census tracts in central, south, and east Albany have unemployment rates above 20%.

¹³ Georgia Department of Labor. (2020). Civilian Labor Force Estimates. Retrieved from: <https://dol.georgia.gov/area-unemployment-rate-and-labor-force-estimates>

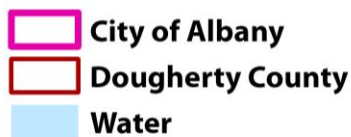
Figure 10. Unemployment Rate and Race/Ethnicity

Unemployment Rate + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Unemployment Rate, Population Aged 16+



Race + Ethnicity

1 Dot = 10 People

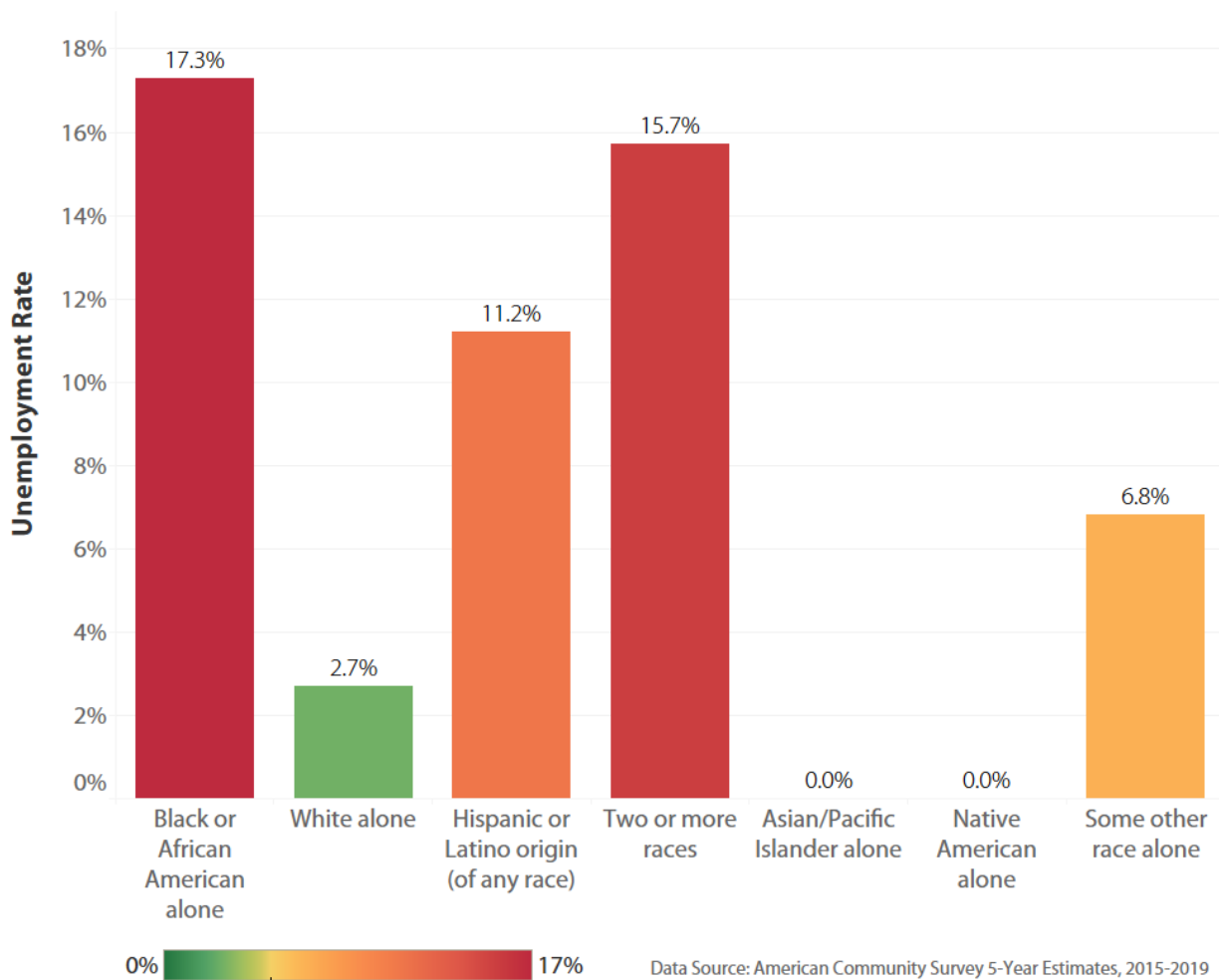


Variations in unemployment rates exist across racial and ethnic groups in Albany. Black residents and residents of two or more races experience the highest levels of unemployment (17.3% and 15.7% are unemployed, respectively), while Asian or Pacific Islander, Native American, and white residents are least likely to be unemployed (0.0%, 0.0%, and 2.7%, respectively).

“We need job training for youth. I have proposed that the City and County need to get together and develop job training. There is a lot of disconnect between jobs available and people who are qualified for the jobs. When a company comes to Albany, they hire people outside of the city because they can’t find qualified people...I’ve seen examples in Birmingham, the City and County get together and do job training. If they can identify 50 youth who have no jobs, they can put them through a job training program at Albany Tech.”

-Stakeholder

Figure 11. Unemployment by Race/ Ethnicity

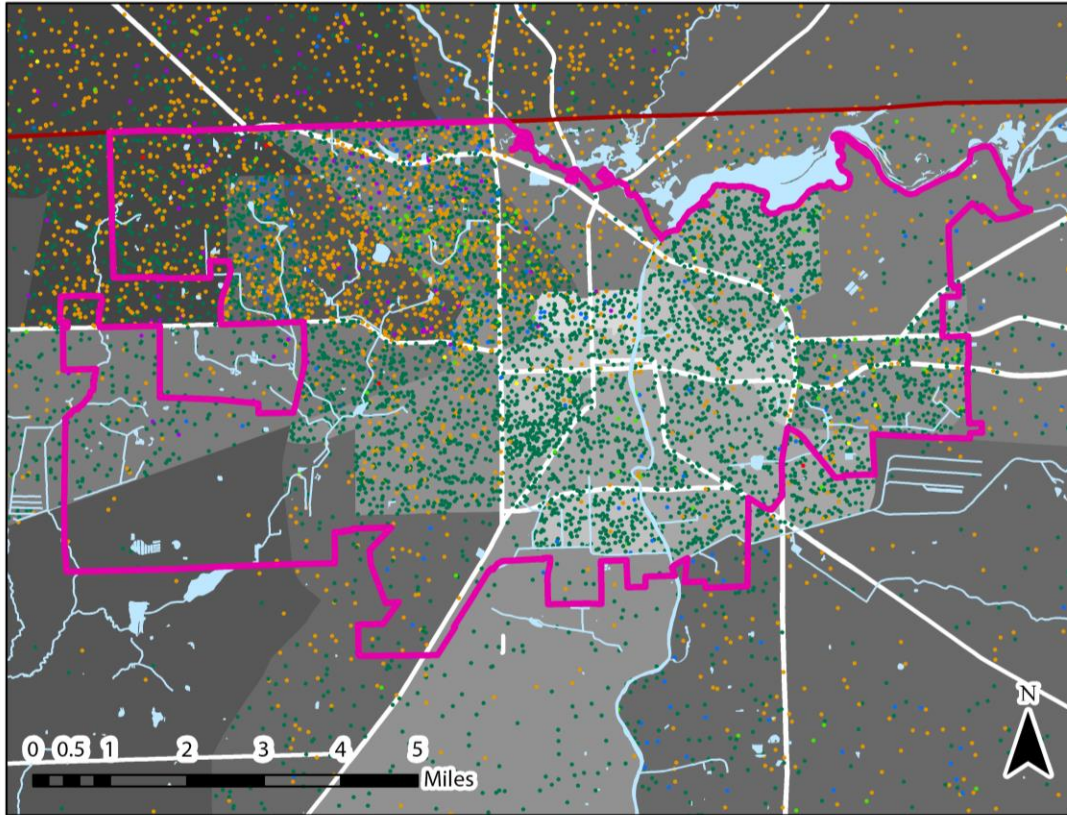


Household income is another indicator of access to employment and jobs that pay living wages. Median household incomes in Albany are lowest in parts of central, south, and east Albany, where median incomes in five census tracts are below \$20,000. Median incomes are highest in the western portion of the city: in three census tracts in west and northwest Albany, median incomes are greater than \$70,000. Tracts with the highest median

incomes tend to have higher percentages of white residents and lower percentages of residents of other races (see Figure 17).

Figure 12. Median Household Income and Race/Ethnicity

Median Household Income + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Median Household Income

	\$13,000 - \$15,000		\$35,000 - \$45,000
	\$15,000 - \$20,000		\$45,000 - \$60,000
	\$20,000 - \$25,000		\$60,000 - \$80,000
	\$25,000 - \$35,000		\$80,000 - \$104,000

	City of Albany
	Dougherty County
	Water

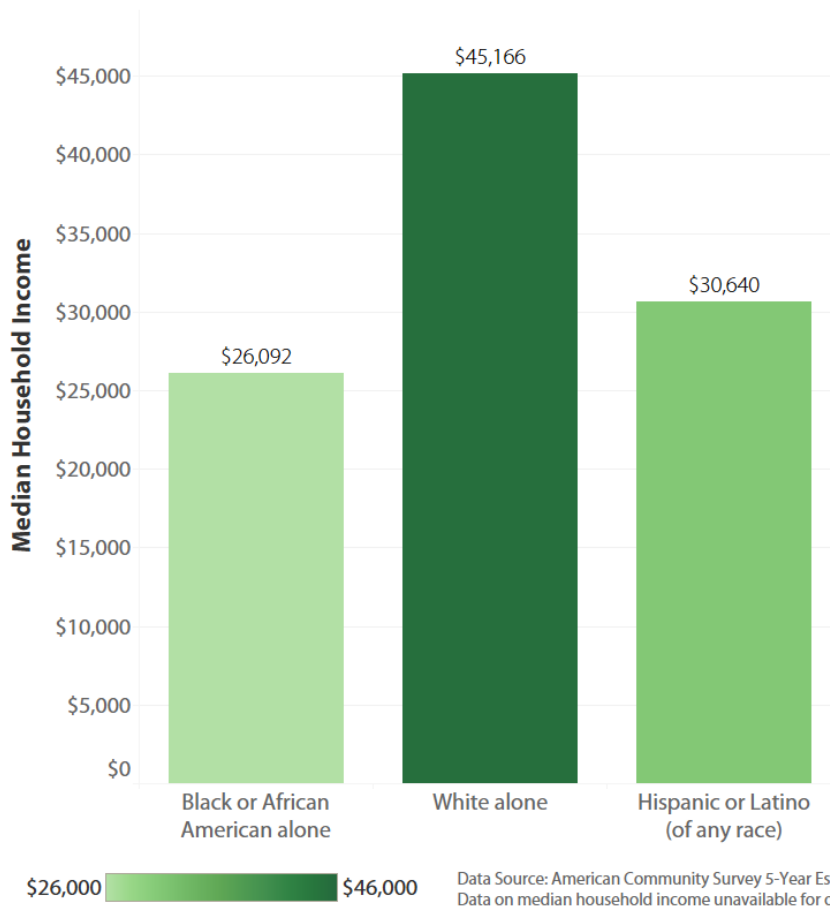
Race + Ethnicity

1 Dot = 10 People

●	Black, Non-Hispanic
●	White, Non-Hispanic
●	Hispanic or Latino (of any race)
●	Multiple Races
●	Asian/ Pacific Islander, Non-Hispanic
●	Native American, Non-Hispanic
●	Other Race, Non-Hispanic

Household incomes tend to be highest for white households and lowest for Black households (see Figure 18).

Figure 13. Median Household Income by Race/ Ethnicity



Low median household incomes in many of the city’s census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. Costs for a family of two working adults and one child in Albany, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, are estimated at \$5,293.50 per month (or \$63,522 annually).¹⁴ Yet, 26.3% of primary jobs held by Albany residents pay \$1,250 per month or less (\$15,000 or less per year), and 45.6% of primary jobs pay between \$1,251 and \$3,333 (between \$15,000 and \$39,996 per year).¹⁵

“Until we can bring jobs to our area that provide a living wage, a lot of people have to work two to three jobs because they are on a part time salary. We have to bring in jobs that provide people with a livable wage. Small businesses ownership tends to be one of the best ways to do that.”

-Stakeholder

¹⁴ MIT Living Wage Calculator. (2018). Retrieved from: <https://livingwage.mit.edu/>

¹⁵ Longitudinal Employer-Household Dynamics data. Home Area Profile Analysis. Retrieved from: onthemap.ces.census.gov/

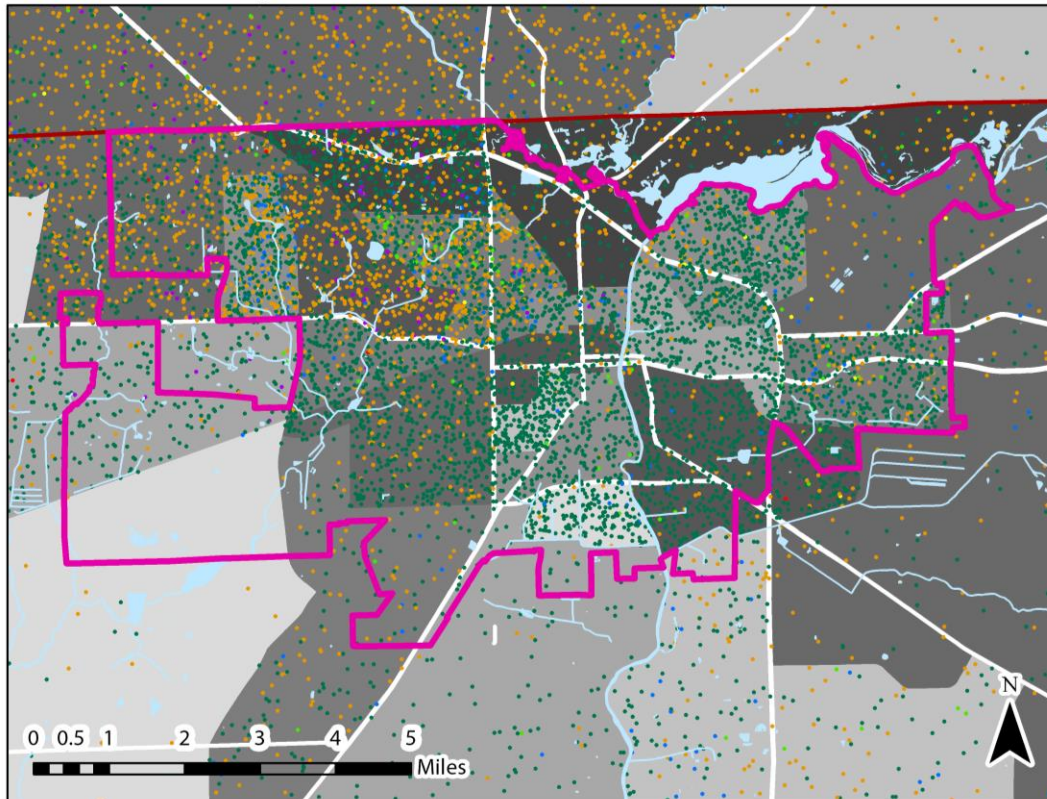
Residents and stakeholders who participated in this planning process emphasized a need to connect residents with paid job training programs; to expand existing training and skills programs, including programs focused on youth employment; and to bring jobs to the city that pay living wages.

Jobs Proximity

Mapping locations of jobs in Albany shows that they tend to be clustered in north Albany—including at and around Phoebe Putney Memorial Hospital—and in central and southeast Albany. Fewer jobs exist in south and southwest Albany (see Figure 19).




Figure 14. Jobs proximity in the city of Albany


Jobs Proximity + Race/ Ethnicity



Source: U.S. Census Bureau, Center for Economic Studies (CES). (2018). OnTheMap. Work Area Profile Analysis.

Number of Jobs by Census Tract	
20 - 200	1,001 - 1,500
201 - 500	1,501 - 2,500
501 - 750	2,501 - 5,000
751 - 1,000	5,001 - 6,800

-  City of Albany
-  Dougherty County
-  Water

- Race + Ethnicity**
1 Dot = 10 People
-  Black, Non-Hispanic
 -  White, Non-Hispanic
 -  Hispanic or Latino (of any race)
 -  Multiple Races
 -  Asian/ Pacific Islander, Non-Hispanic
 -  Native American, Non-Hispanic
 -  Other Race, Non-Hispanic



Longitudinal Employer-Household Dynamics data also indicates that a high proportion of workers living in the city work outside of the city of Albany. Specifically, an estimated 24,208 employed residents live in the city of Albany. These include 12,575 residents who both live and work in the city of Albany (51.9%) and 11,633 residents who live in Albany but work outside of the city (48.1%) (see Table 4). This data further demonstrates that lack of access to vehicles and low levels of public transportation access may be barriers for a high proportion of residents in accessing employment, which may require long commutes. Overall, labor market engagement, job proximity, commuting, and cost of living indicators for Albany indicate disparities in access to opportunity among protected classes in the city.

Table 4 – Inflow and Outflow of Workers (Primary Jobs), City of Albany

Inflow and Outflow of Workers	Number	Percent
Living in City of Albany	24,208	100.0%
Living in the City but Employed Outside of the City	11,633	48.1%
Living and Employed in City of Albany	12,575	51.9%
Employed in City of Albany	37,824	100.0%
Employed in the City but Living Outside of the City	25,249	66.8%
Employed and Living in City of Albany	12,575	33.2%

Source: Longitudinal Employer-Household Dynamics (LODES) data, 2018

Education

School proficiency is an indication of the quality of education that is available to residents of an area. High-quality education is a vital community resource that can lead to more opportunities and improve quality of life. Public schools in the city of Albany are part of the Dougherty County School System, which consists of 21 schools, including three high schools, four middle schools, and 14 elementary schools. In addition to the schools within the Dougherty County School System, the city has private schools and charter schools. Students in the Dougherty County School System attend schools based on the primary residence of their parent(s) or legal guardian(s). Residents may also apply to enroll their children in magnet schools if students meet certain criteria.

Performance varies among schools in the district (see Table 5). Among elementary schools, the proportion of students scoring at the Beginning Learners level (the lowest of four achievement levels in the Georgia Milestones Mathematics End of Grade Assessment) ranges from 4.7% at Lincoln Elementary Magnet School in central Albany to 49.4% at Martin Luther King, Jr. Elementary School, located just south of the city. Among the four middle schools for which students in Albany are zoned, the proportions of students scoring at the Beginning Learners level ranges from 2.6% at Robert A. Cross Middle Magnet School in west Albany to 56.4% at Radium Springs Middle Magnet School of the Arts, located just south of the city.

“Our school system is not ideal in terms of test scores. We have to find ways of increasing school system statistics as well...For most parents who want a better quality education, they look to private schools or neighboring communities. Dual enrollment or charter schools may also be alternatives.”

-Stakeholder

Table 5. Demographics and Performance by School

School	% Black Students	% Students with Limited English Proficiency	% of Students with a Disability	% Free or Reduced Lunch	Graduation Rate (High School Only)	% Beginning Learners in Mathematics (End of Grade Assessment Grades 3-8)
Alice Coachman Elementary	94.0%	0.0%	11.3%	100.0%	N/A	45.8%
International Studies Elementary Charter	71.0%	18.0%	7.6%	100.0%	N/A	7.8%
Lake Park Elementary	49.0%	3.0%	7.4%	100.0%	N/A	15.6%
Lamar Reese Magnet School of the Arts	99.0%	0.0%	6.2%	100.0%	N/A	15.8%
Lincoln Elementary Magnet	96.0%	1.0%	1.6%	100.0%	N/A	4.7%
Live Oak Elementary	36.0%	10.0%	12.5%	59.0%	N/A	17.2%
Martin Luther King, Jr. Elementary	96.0%	0.0%	10.9%	100.0%	N/A	49.4%
Morningside Elementary	93.0%	2.0%	9.0%	100.0%	N/A	29.6%
Northside Elementary	91.0%	0.0%	22.0%	100.0%	N/A	37.3%
Radium Springs Elementary	80.0%	7.0%	12.6%	100.0%	N/A	29.6%
Robert H. Harvey Elementary	98.0%	0.0%	8.0%	100.0%	N/A	39.5%
Sherwood Acres Elementary	84.0%	4.0%	13.0%	100.0%	N/A	15.0%
Turner Elementary	88.0%	6.0%	15.3%	100.0%	N/A	26.3%
West Town Elementary	99.0%	0.0%	15.6%	100.0%	N/A	16.8%
Albany Middle	93.0%	1.0%	14.2%	100.0%	N/A	41.1%
Merry Acres Middle	92.0%	1.0%	15.4%	100.0%	N/A	30.8%
Radium Springs Middle Magnet School of the Arts	90.0%	6.0%	15.4%	100.0%	N/A	56.4%
Robert A. Cross Middle Magnet	85.0%	3.0%	0.7%	100.0%	N/A	2.6%
Dougherty Comprehensive High School	90.0%	2.0%	11.1%	100.0%	82.9%	N/A
Monroe Comprehensive High School	96.0%	1.0%	13.5%	100.0%	79.6%	N/A
Westover Comprehensive High School	87.0%	1.0%	8.7%	100.0%	88.1%	N/A

Source: Georgia Department of Education. (2018-2020). Demographic data for schools is from 2019-2020, and End of Grade Assessment data is from 2018-2019.

Elementary and middle schools with the highest percentages of students scoring at the Beginning Learners level tend to be located in and around south and east Albany, including Albany Middle School, Alice Coachman Elementary, Martin Luther King, Jr. Elementary, and Robert H. Harvey Elementary. In contrast, elementary and middle schools with the lowest percentages of students scoring at the Beginning Learners level tend to be located in northwest and west Albany, including Lake Park Elementary, Live Oak Elementary, Sherwood Acres Elementary, and West Town Elementary. Several of the city’s magnet and charter schools also relatively low percentages of students scoring at the Beginning Learners level. Students’ acceptance into these schools is generally based on certain application criteria rather than their school zone.

Figure 15. Dougherty County School System Elementary School Zones

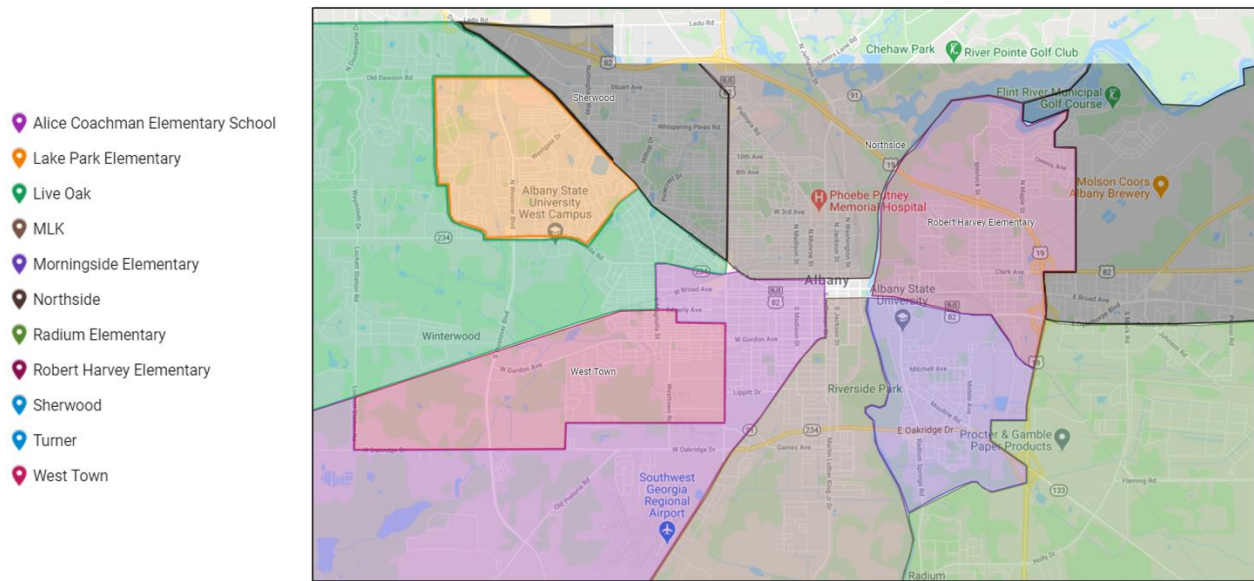
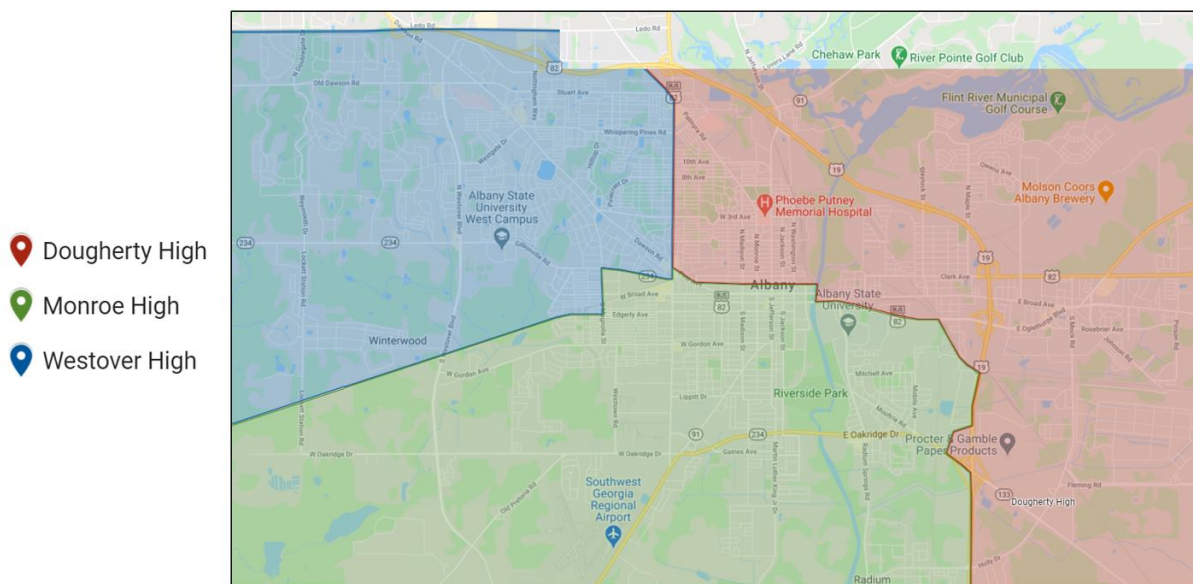


Figure 21: Dougherty County School System High School and Middle School Zones



Source: Dougherty County School District.

Note: Students zoned for Dougherty High School are also zoned for Albany Middle School; students zoned for Monroe High School are also zoned for Radium Springs Middle Magnet School of the Arts; and students zoned for Westover High School are also zoned for Merry Acres Middle School.

Disparities also exist in performance by population (see Table 6). Notably, elementary school students with disabilities, students experiencing homelessness, and Black or African American students scored at the Beginning Learners level at the highest rates (63.9%, 34.3%, and 26.2%, respectively), while Asian and white students scored at this level at the lowest rates (9.1% and 13.2%, respectively).

Overall, geographic disparities in school performance and disparities by population in academic performance indicate a need to ensure all students have access to the resources and support they need to succeed. Residents and stakeholders who participated in this planning process emphasized a need for youth centers and youth development programming, including education, job readiness, mentoring, and recreation services.

Table 6. Percent of Elementary School Students Scoring at Beginning Learners Level in Georgia Milestones End of Grade Assessment by Population, 2018-2019

Population	Percent of Elementary Students Scoring at Beginning Learners Level
All Students	24.9%
Asian	9.1%
Black or African American	26.2%
White	13.2%
Two or More Races	18.6%
Hispanic	16.1%
Students with Disabilities	63.9%
Students without Disabilities	20.6%
Limited English Proficient	23.3%
Not Limited English Proficient	24.9%
Economically Disadvantaged	24.9%
Homeless	34.3%

Source: Georgia Department of Education, 2018-2019

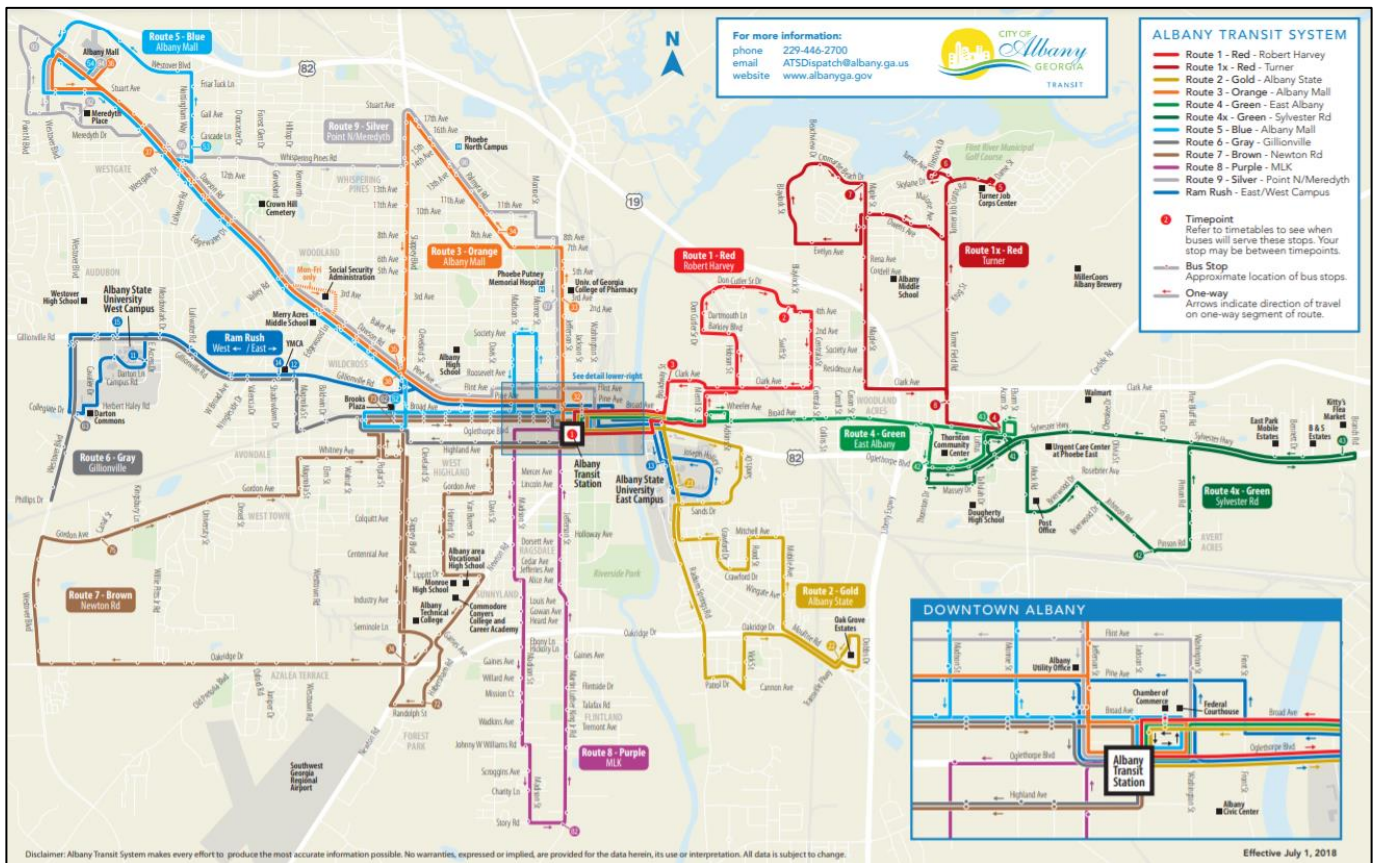
Transportation

Affordable, accessible transportation facilitates access to a range of opportunities, providing residents with connections to employment, education, fresh food, healthcare, and other services. Low-cost public transportation can increase access to these resources, while a lack to access to affordable transportation often poses barriers to meeting key needs, particularly in areas with low walkability and a lack of access to vehicles.

Access to Affordable Transportation

Albany Transit System provides public transportation in the city of Albany, including fixed route services and paratransit services for ADA-eligible riders. The system includes nine fixed routes plus the Ram Rush, which connects the east and west Albany State University campuses (see Figure 21). Transit is available Monday through Saturday.

Figure 16: Albany Transit System Routes



Source: Albany Transit System

For low-income households, estimates of transportation costs as a percentage of household income are high across the city’s census tracts. Figure 27 estimates transportation expenses for a three-person single-parent family with income at 50% of the regional median income for renters. Estimates of transportation spending as a percentage of household income for this family range from 40.7% to 57.3% in the city’s census tracts.¹⁶ Residents in central Albany, which have the greatest access to the Albany Transit System, tend to have the some of the lowest transportation

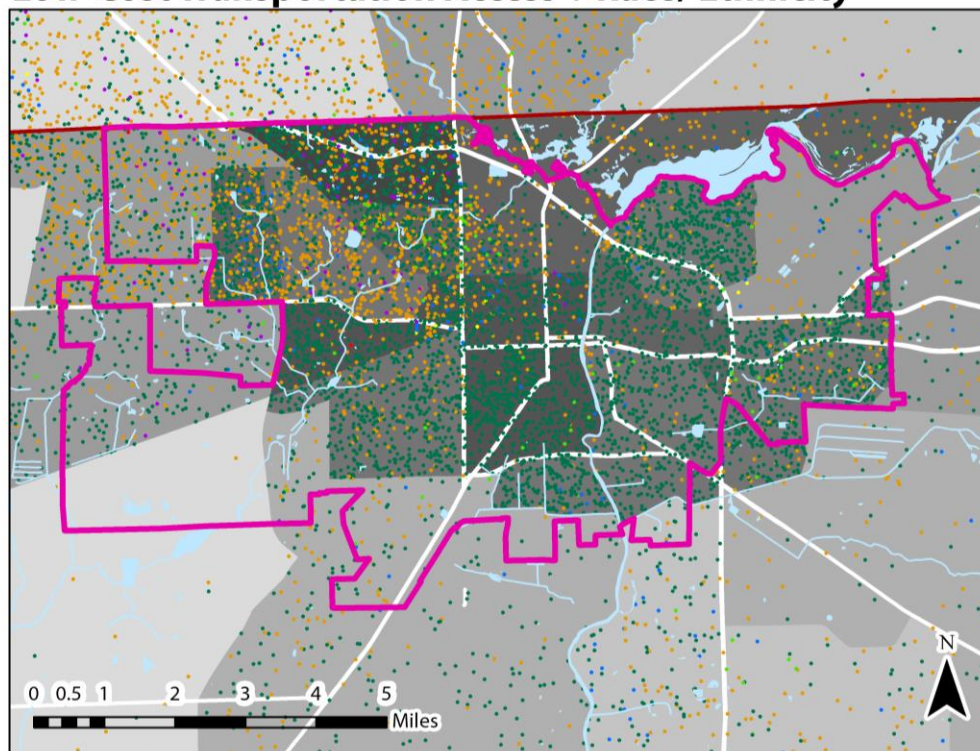
¹⁶ Based on Location Affordability Index estimates of transportation expenses as a percent of income for a 3-person single-parent family with income at 50% of the median income for renters in the region for 2012 to 2016 (household type 6 (hh_type6_) for renters (t_rent), as noted in the LAI data dictionary).

costs relative to income. Transportation costs tend to make up a greater share of income in census tracts in southwest, south, and northeast Albany. In some census tracts in south Albany specifically, a combination of low proximity to jobs and a high proportions of residents' incomes spent on transportation may present barriers to obtaining and maintaining employment.

Residents and stakeholders who participated in this planning process emphasized that affordable transportation options are of particular need for seniors, people with disabilities, and people experiencing homelessness, and that transportation-related needs have increased during COVID-19.






Figure 17. Low-Cost Transportation Access and Race/Ethnicity




Low-Cost Transportation Access + Race/ Ethnicity



Source: Location Affordability Index, v. 3 (2012-2016)

Transportation Costs as Percent of Household Income*

 40% - 42%	 46% - 48%	 52% - 54%
 42% - 44%	 48% - 50%	 54% - 56%
 44% - 46%	 50% - 52%	 56% - 58%

-  City of Albany
-  Dougherty County
-  Water

Race + Ethnicity

1 Dot = 10 People

-  Black, Non-Hispanic
-  White, Non-Hispanic
-  Hispanic or Latino (of any race)
-  Multiple Races
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-  Native American, Non-Hispanic
-  Other Race, Non-Hispanic

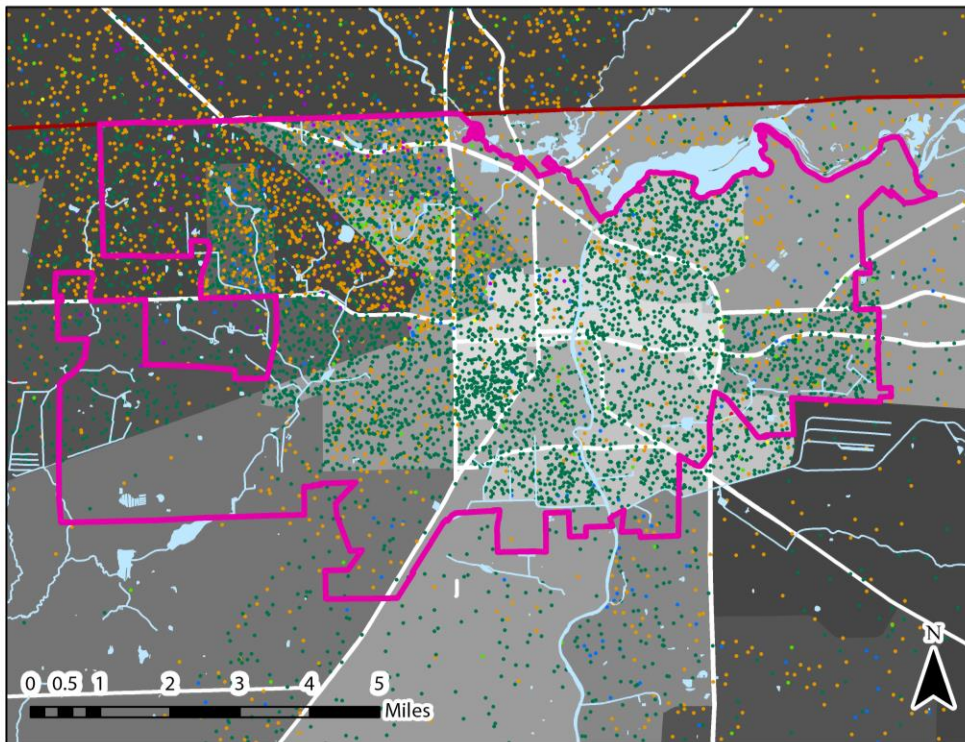
* Based on estimates of transportation costs for a 3-person single-parent family with income at 50% of median income for renters in the region

Vehicle Access

Access to vehicles is another indicator of residents' access to transportation, particularly in areas with limited access to public transit. An estimated 14.0% of households in Albany do not have access to a vehicle, according to American Community Survey 5-Year Estimates for 2015 to 2019. Residents in the Enterprise neighborhood and surrounding census tracts in central Albany, east Albany, and south Albany tend to have the lowest levels of vehicle access in the city; in four census tracts in central and east Albany, between 32.4% and 42.5% of households do not have a vehicle. In contrast, in most of northwest Albany, almost all households have access to vehicles. Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is a barrier to food access in areas of the city with limited fresh food retailers.

Figure 18. Vehicle Access and Race/Ethnicity



Vehicle Access + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Percent of Households with No Vehicle

0% - 2%	6% - 8%	15% - 20%
2% - 4%	8% - 10%	20% - 25%
4% - 6%	10% - 15%	25% - 43%

	City of Albany
	Dougherty County
	Water

Race + Ethnicity

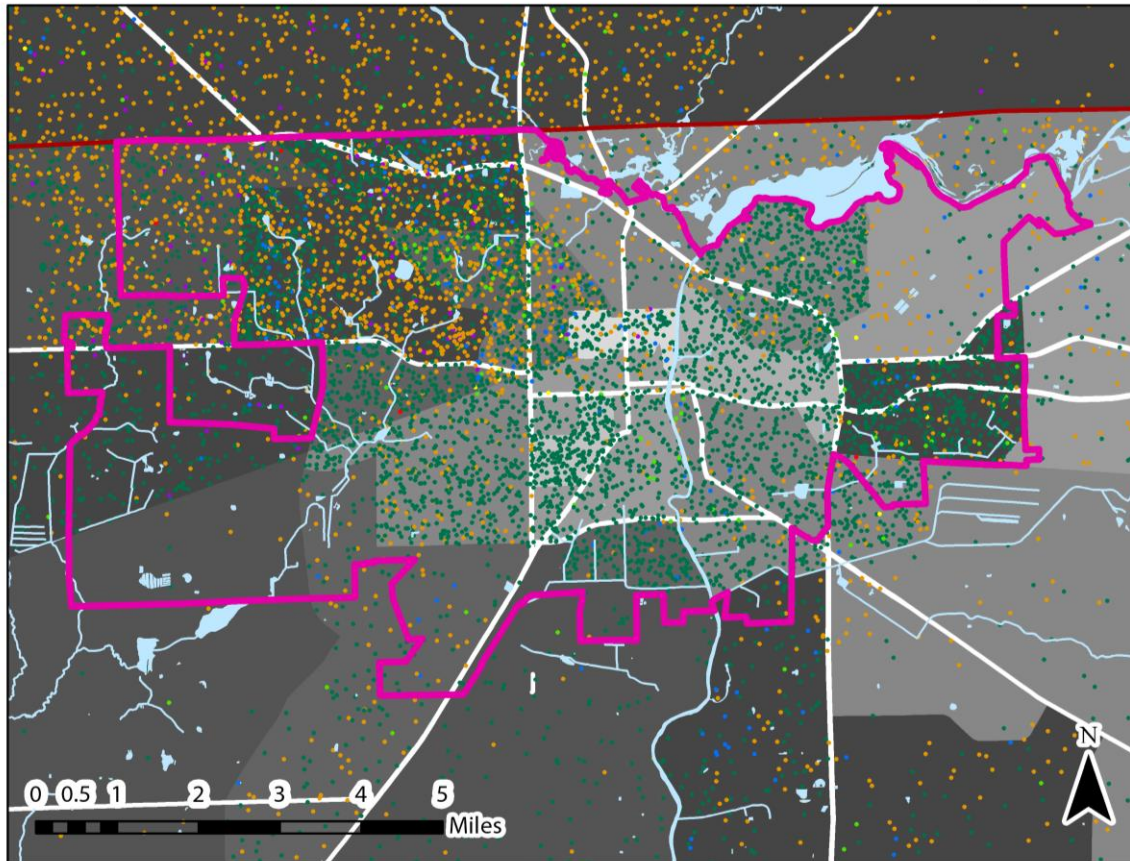
1 Dot = 10 People

	Black, Non-Hispanic
	White, Non-Hispanic
	Hispanic or Latino (of any race)
	Multiple Races
	Asian/ Pacific Islander, Non-Hispanic
	Native American, Non-Hispanic
	Other Race, Non-Hispanic

As would be expected, areas with lower levels of vehicle access tend to have higher proportions of residents who take public transportation, walk, bike, or take taxis to work (see Figure 24). In one census tract in the Enterprise neighborhood, an estimated 47.6% of residents use these forms of transportation, the highest proportion in the city. In contrast, in three tracts in west Albany, 1% or less of residents use these forms of transportation.

Figure 19. Means of Transportation to Work and Race/Ethnicity



Means of Transportation to Work + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Percent of Workers Aged 16+ Who Take Public Transportation, Walk, Bike, or Taxi to Work

0% - 2%	4% - 5%	15% - 20%
2% - 3%	5% - 10%	20% - 25%
3% - 4%	10% - 15%	25% - 48%

-  City of Albany
-  Dougherty County
-  Water

Race + Ethnicity

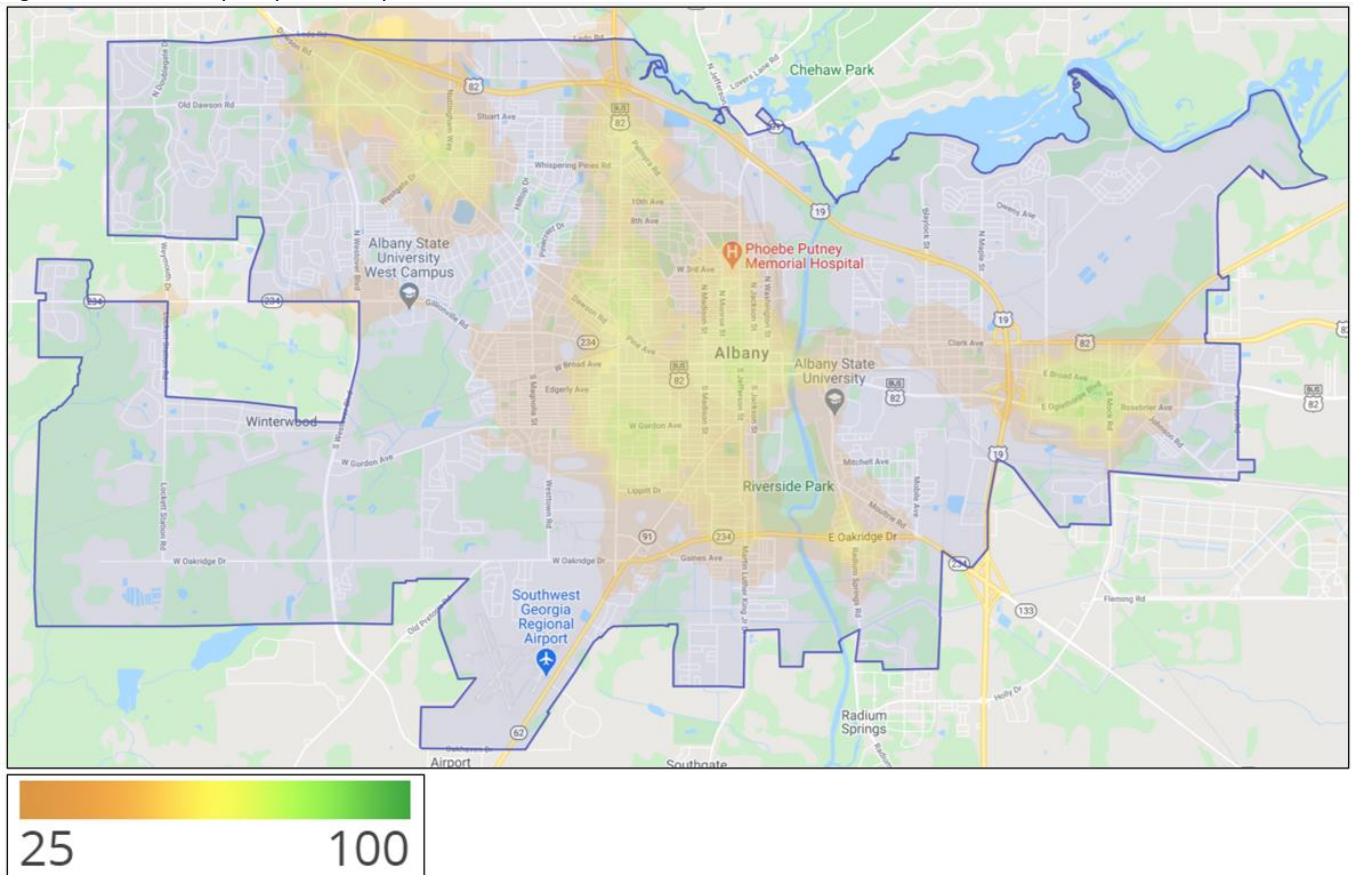
1 Dot = 10 People

-  Black, Non-Hispanic
-  White, Non-Hispanic
-  Hispanic or Latino (of any race)
-  Multiple Races
-  Asian/ Pacific Islander, Non-Hispanic
-  Native American, Non-Hispanic
-  Other Race, Non-Hispanic

Walkability

Along with access to affordable transportation, neighborhood walkability shapes the extent to which residents can access employment, resources, and services. The city of Albany is generally car-dependent. Albany scores 25 out of 100 on Walk Score’s walkability index,¹⁷ indicating that most errands require a car. However, there is some variation in walkability and access to amenities among the city’s neighborhoods (see Figure 25). Central Albany and parts of northwest and east Albany have the highest levels of walkability, while the rest of the city is highly car-dependent. However, residents and stakeholders emphasized that many areas of the city--particularly south and east Albany--lack sidewalks, making accessing resources and services via walking more difficult and less safe. Residents emphasized that children often have to walk along busy highways and high-traffic streets to get to school or other community resources. In this way, low levels of vehicle access may pose a more significant barrier to accessing services and employment for residents living outside of the more walkable areas in and around downtown Albany.

Figure 20. Walkability, City of Albany



¹⁷ Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community. Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. The measure is useful in showing not only walkability but also access to critical facilities.

Environmental Quality

Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in counties, cities, and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development.

At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects, including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.¹⁸

Access to Parks and Environmental Amenities

In the city of Albany, parks are most accessible in downtown and central Albany, areas in which most residents live within a 10-minute walk of a park (see Figure 28). An estimated 54% of Albany residents live within a 10-minute walk of a park, compared to the national average of 55%, according to the Trust for Public Land's ParkScore data for 2020. Areas in west and east Albany are classified as having the greatest need for parks (see Figure 29). Residents and stakeholders who participated in this planning process noted a need to improve the city's recreation and community services facilities, as well as the need to develop new amenities and programming, including a one-stop recreation and sports facility open 24 hours per day and additional recreation-focused programming for youth.

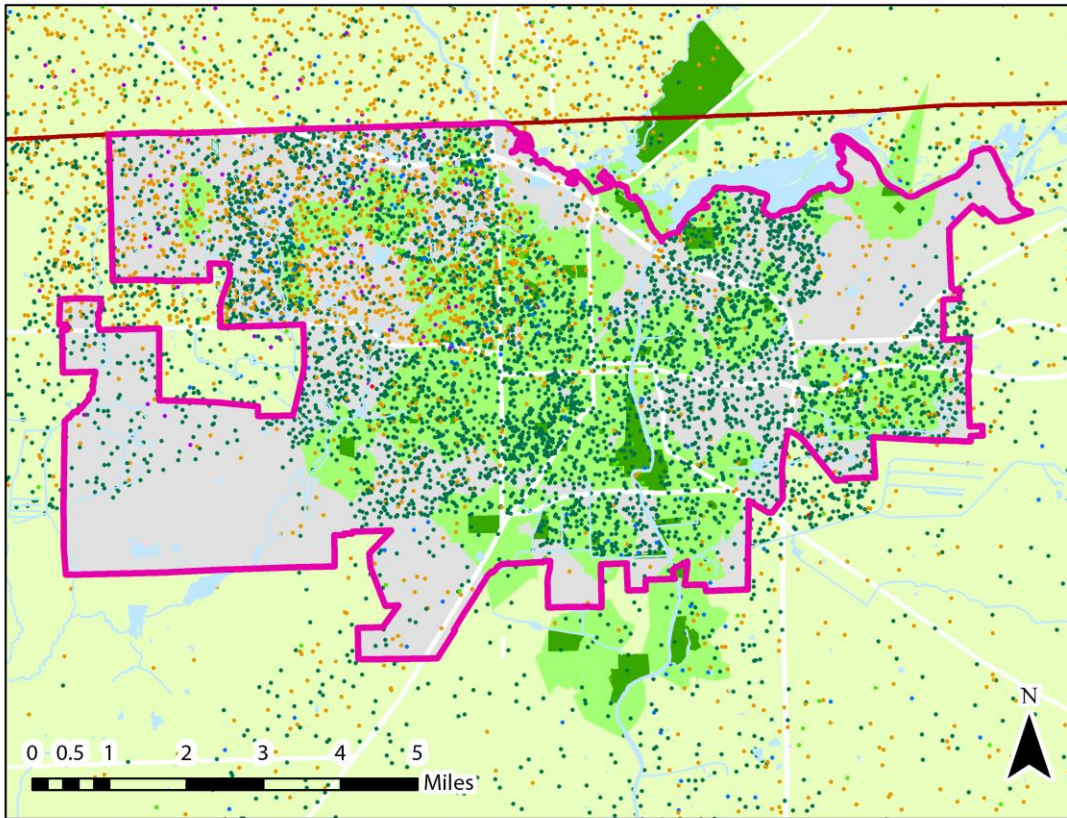
“Many recreation facilities are substandard or closed or understaffed, or do not have programming at all. We have been fighting for the reopening of the cultural center. We don't have a performing arts center in the region. We need more recreation and youth programs.”

-Stakeholder

¹⁸ U.S. Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments. Retrieved from: <https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>

Figure 21. Park Access and Race/ Ethnicity

Park Access + Race/ Ethnicity



Source: Trust for Public Land ParkScore (2020)

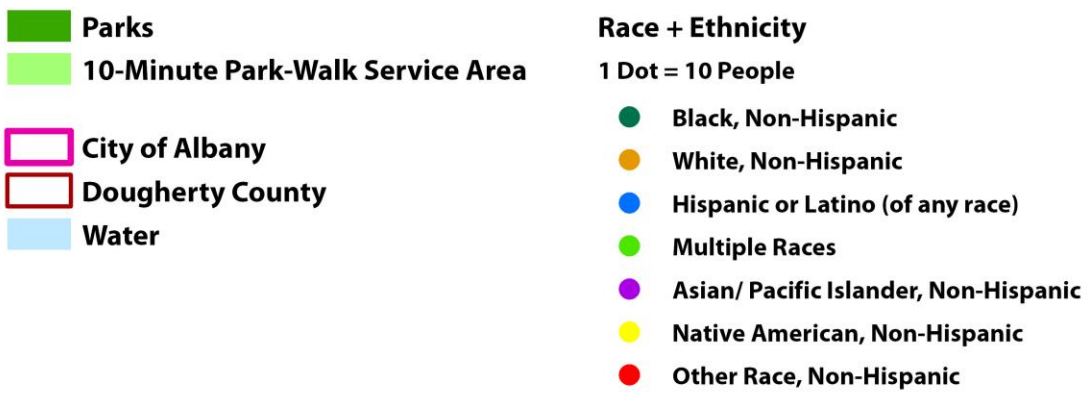
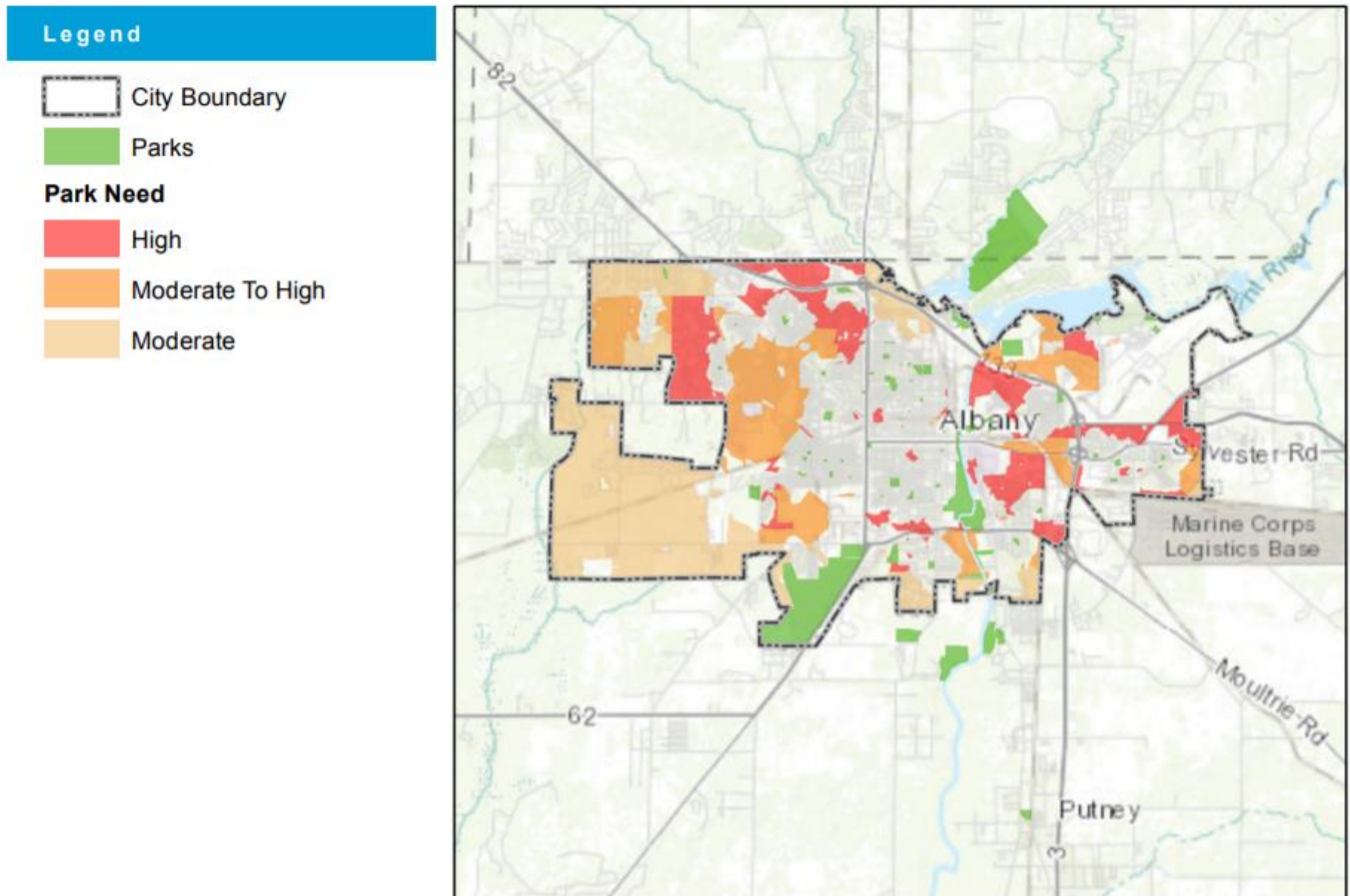


Figure 22. Park Need, City of Albany



Source: ParkScore, Trust for Public Land (2020)

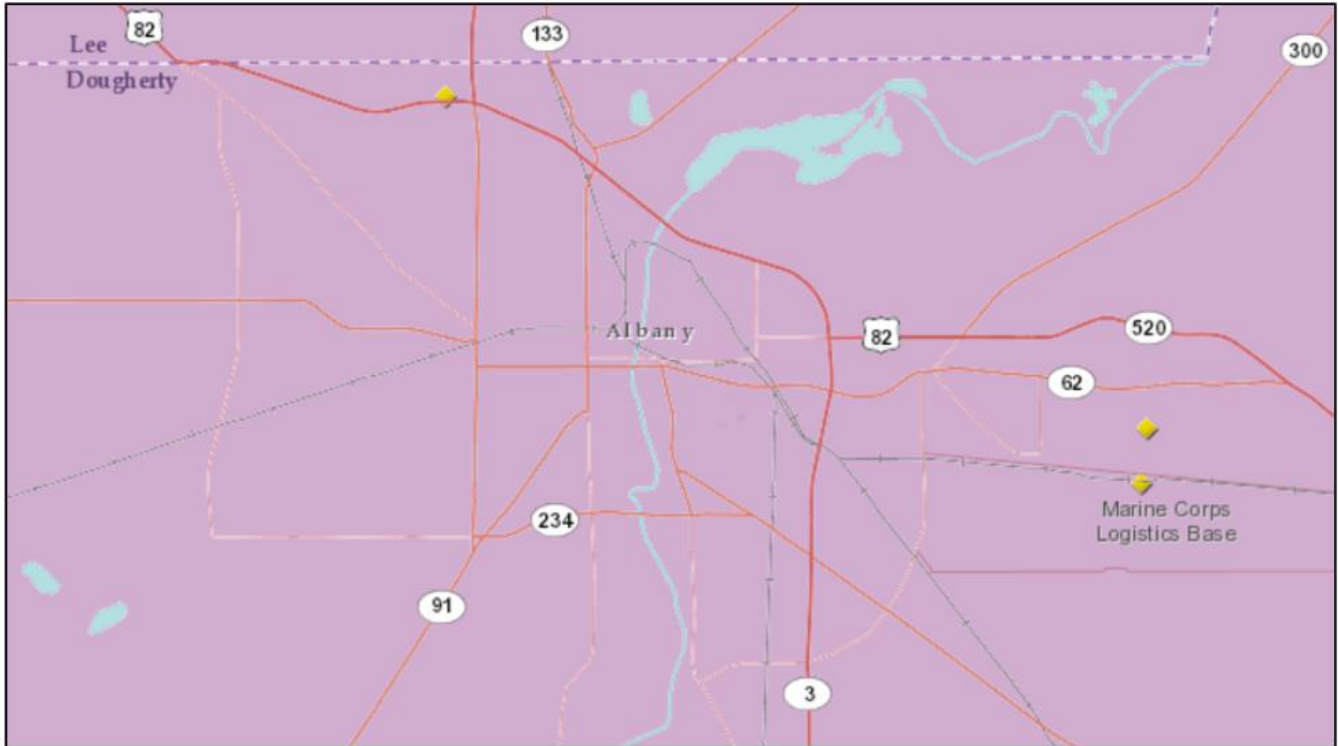
Environmental Hazards

Superfund and Other Hazardous Waste Sites

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). One NPL site—the T. H. Agriculture and Nutrition Company—is located within the city in north Albany. Two others, the Firestone Tire and Rubber Company and Marine Corps Logistics Base, are located about one mile east of the city (see Figure 34).¹⁹

¹⁹ U.S. EPA. (n.d.). Search for Superfund Sites Where You Live. Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

Figure 34 – Superfund National Priorities List (NPL) Sites, City of Albany



Superfund National Priorities List (NPL) Sites with Status Information

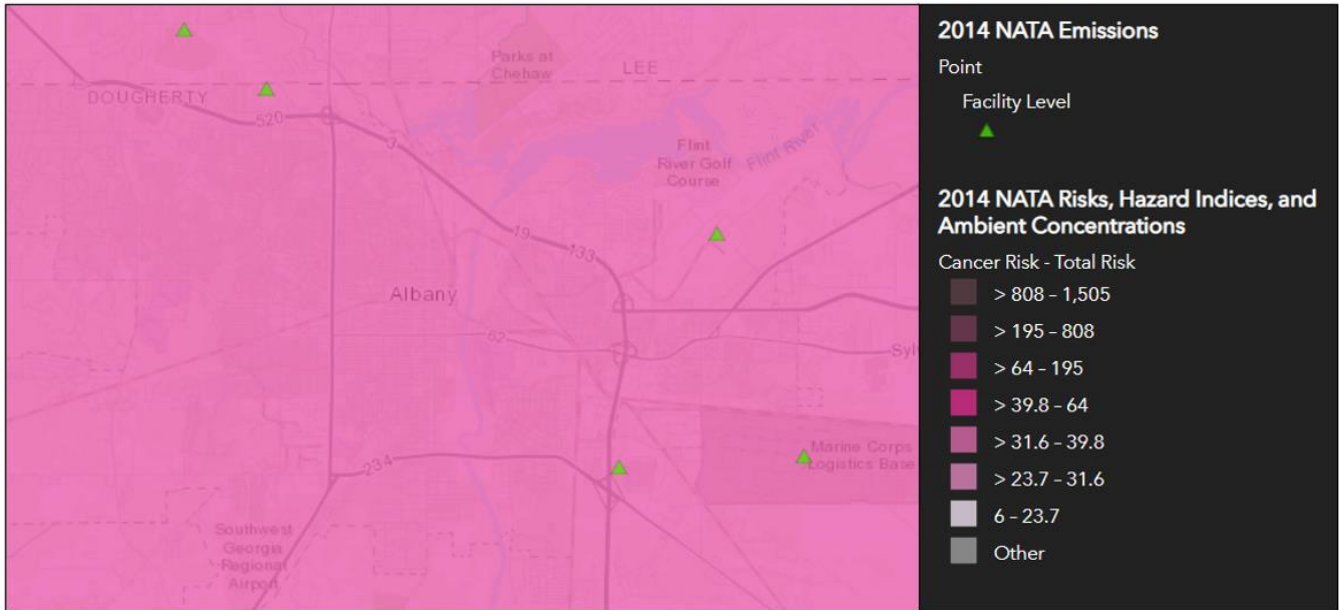
- ◆ NPL Site
- Deleted NPL Site
- Proposed NPL Site

Source: U.S. EPA

Air Toxics and Toxic Release Facilities

The EPA’s National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment, released in 2018, uses data from 2014 to examine cancer risk from ambient concentrations of pollutants. The city of Albany has risks falling in the range of 40 to 45 per million population (see Figure 37). Point sources of emissions include the Miller-Coors facility in east Albany, the Proctor and Gamble located south of the city, and the Marine Corps Logistics Base located east of the city.

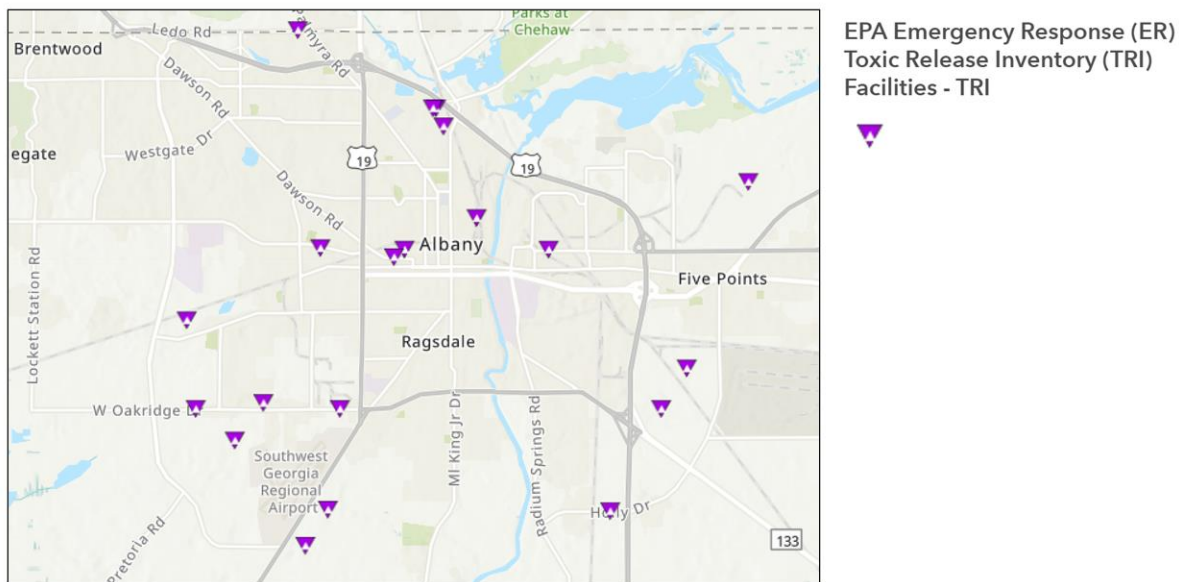
Figure 37 – Air Toxics and Cancer Risk (Per Million Population), City of Albany



Source: Environmental Protection Agency National Air Toxics Assessment (NATA)

The Environmental Protection Agency’s Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment.²⁰ Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. Toxic release inventory sites in the city are clustered around the Southwest Georgia Regional Airport.

Figure 39 – Toxics Release Inventory, City of Albany



Source: U.S. EPA

²⁰ U.S. EPA. (n.d.) Toxic Release Inventory Program. Retrieved from: <https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory>. Data retrieved from: <https://www.arcgis.com/home/item.html?id=2c4a0b5f85b945f8a67125e6a93fa7fe>

Food

Access to food that is both affordable and nutritious is a challenge for many individuals and families in the United States. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may present barriers to access for low-income households, who often must rely on smaller stores that are often unaffordable and do not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher costs of healthy foods such as produce often present barriers to healthy food access for low-income residents.²¹

The most recently available USDA Food Research Atlas data (2015) indicates that the proportion of residents who have low incomes and live further than ½ mile from a supermarket tends to be highest in census tracts in central, east, and south Albany (see Figure 31). In six census tracts in these areas, more than 70% of residents have low incomes and live more than ½ mile from a supermarket. In six additional tracts in west, south, and northeast Albany, 50% to 70% of residents meet the USDA definition of low income and low access at ½ mile.

In contrast, tracts in northwest Albany have highest levels of food access in the city and the lowest proportions of residents with low incomes who live more than ½ mile from a supermarket. In one northwest Albany tract, 13.8% of residents are considered low income and low access, the lowest share in the city. Stakeholders interviewed during this planning process also noted lower levels of access to fresh food retailers in downtown, south, and east Albany, and a need to support measures to increase access to fresh food in the city.

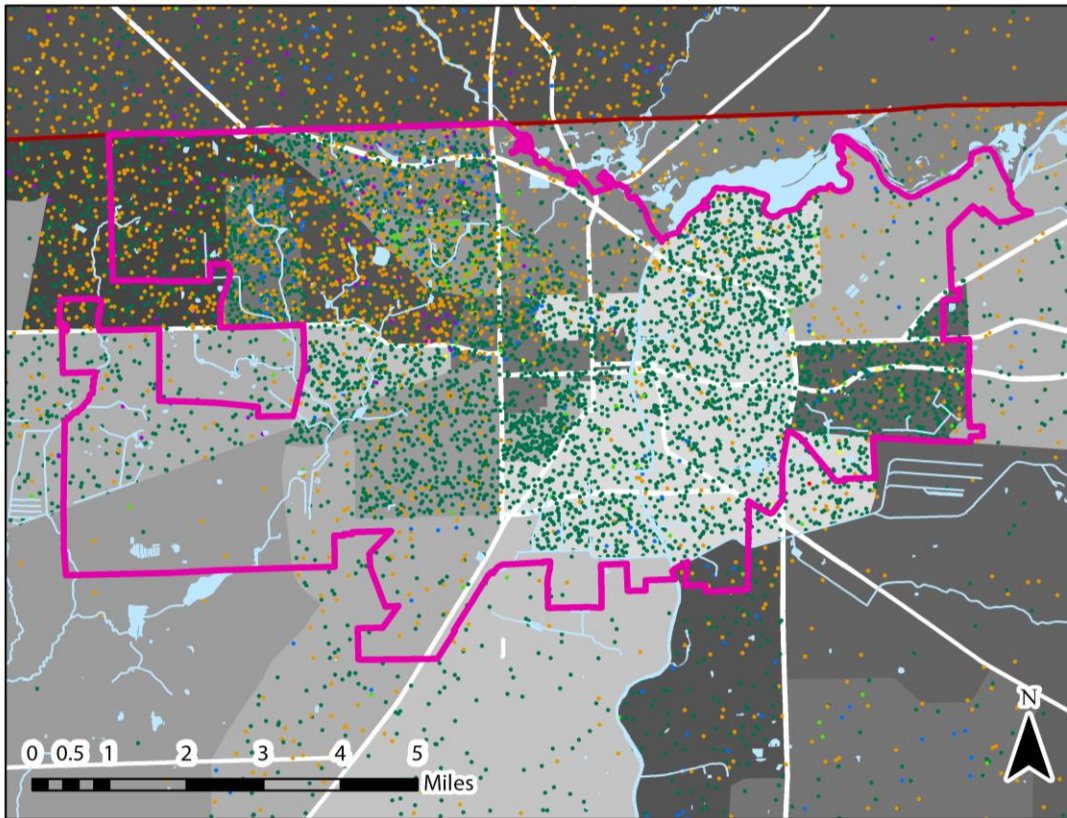
“From the food insecurity side, we need more grocery stores. Food access is an issue. We are an economically depressed community, so people don’t have vehicles and rely on public transportation. We are focusing on smaller neighborhood grocery stores, quality grocery stores, since a lot of chains may not come back to our community. We are pushing for ways in which people can be food entrepreneurs- community gardens, small farm agricultural opportunities, creating an income for themselves and sourcing to stores and farmers markets. We are trying to reestablish a farmers market.”

-Stakeholder

²¹ Valdez Z, Ramírez AS, Estrada E, Grassi K, Nathan S. Community Perspectives on Access to and Availability of Healthy Food in Rural, Low-Resource, Latino Communities. *Prev Chronic Dis* 2016;13:160250.

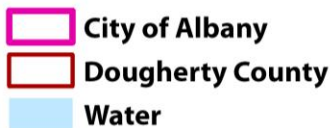
Figure 23. Food Access and Race/Ethnicity

Food Access + Race/ Ethnicity



Source: USDA Food Access Research Atlas, 2015

Percent of Population Who Are Low-Income and Live More Than 1/2 Mile from a Supermarket



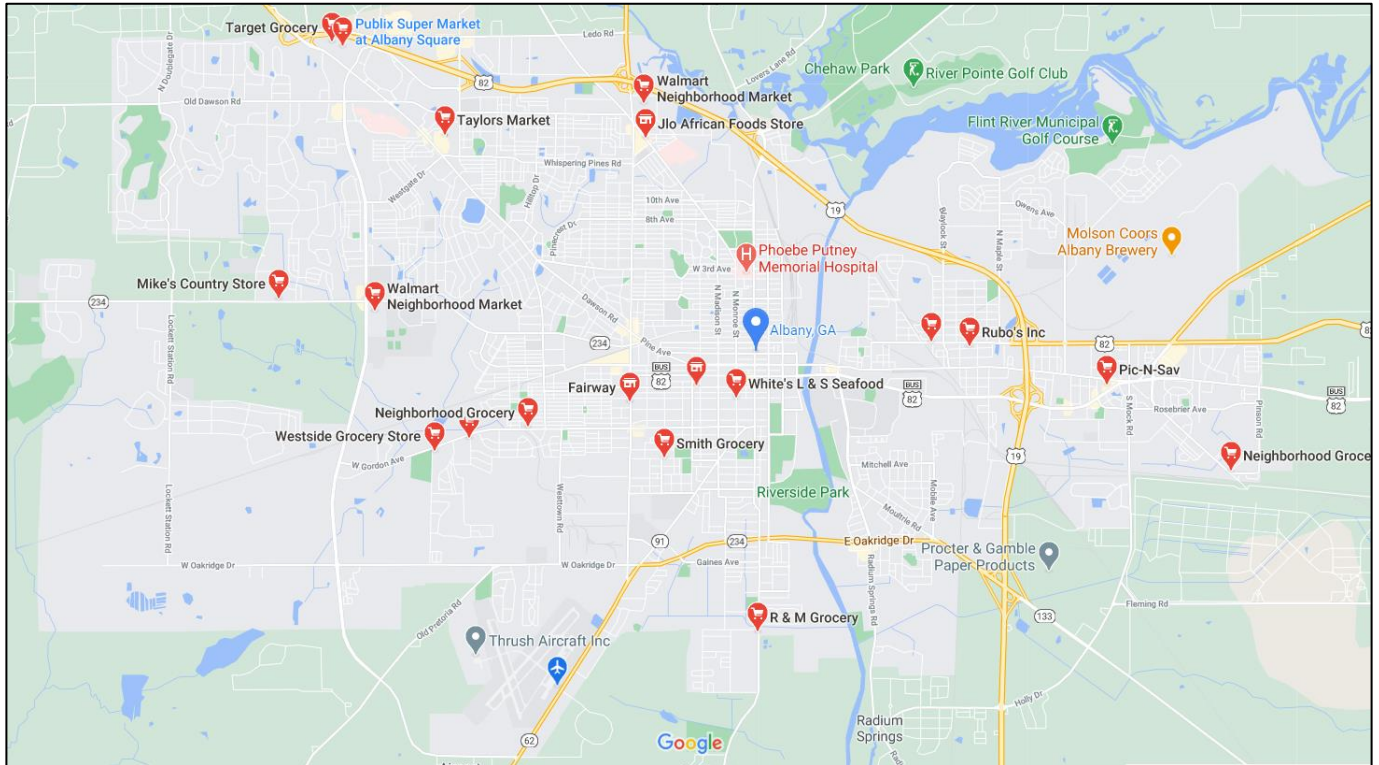
Race + Ethnicity

1 Dot = 10 People



More recent data on locations of food outlets from Google Maps shows that most large food retailers, including Publix, Target, and Walmart Neighborhood Market, are located in northwest and west Albany, while smaller food retailers, convenience stores, and dollar stores serve most of the rest of the city (see Figure 32). East Albany is served by a Walmart Supercenter, Pic-N-Sav, and Rubo’s Grocery, among other small food retailers and dollar stores. The Tift Park Community Market, held at Tift Park in north central Albany, offers fresh produce on Saturdays.

Figure 24. Grocery Store Locations, City of Albany



Source: Google Maps

In addition to distance from food outlets, the quality and affordability of fresh food available at those outlets are important factors in considering food access. As much of central and south Albany is served primarily by smaller food outlets or dollar stores, many residents may require access to vehicles or need to use public transit to access one of the area's larger supermarkets.

Figure 25. Food outlets in northwest, central, and south Albany



Publix and Walmart Neighborhood Market in northwest Albany (left); Smith's Super Value in central Albany (upper right); and R & M Grocery in south Albany (lower right)

Source: instantstreetview.com

Poverty and a lack of access to vehicles also contribute to food insecurity in Albany. An estimated 30.8% of the city's residents were living below the federal poverty level as of the 2015-2019 American Community Survey Five-Year Estimates, indicating that low incomes are a barrier for a substantial portion of residents in accessing fresh food. Disparities in poverty exist by race: 35.1% of the city's Black residents --who make up the majority of the population in central, south, and east Albany-- were living below the poverty level in 2015-2019, a rate more than double that of the city's white residents (15.7%). Residents of two or more races were also overrepresented in the population living in poverty (47.4%). Poverty rates were highest in the Enterprise neighborhood (downtown), other areas of central Albany, and east Albany, where an estimated 52.9% to 62.3% of the population was living below the poverty level from 2015 to 2019.

These areas also have the lowest levels of vehicle access in the city--more than 30% of households do not have vehicles--potentially creating barriers for residents in accessing larger food outlets in other parts of the city. In this way, the combination of uneven distribution and quality of fresh food retailers, the substantial proportions of households with low incomes, and a lack of access to vehicles in low-income neighborhoods create barriers to food access and security in the city.

Healthcare

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length and quality of life. Residents of Dougherty County have access to healthcare providers at a rate of one primary care physician per 1,300 residents, one dentist per 1,690 residents, and one mental health provider per 750 residents, indicating higher levels of access to primary care physicians and dental providers than in the state of Georgia overall, but slightly lower levels of access to mental health providers (see Table 7).²² Participants in Phoebe Putney Memorial Hospital’s Community Health Needs Assessment (2020-2022)²³ also identified the availability of mental health services for all ages as a key issue in access to healthcare in the region.

Table 7: Ratios of Population to Healthcare Providers, Dougherty County and State of Georgia

	Dougherty County	Georgia
Primary Care Physicians	1,300:1	1,530:1
Dentists	1,690:1	1,960:1
Mental Health Providers	750:1	730:1

Source: County Health Rankings, 2020

Health services in Albany tend to be clustered around Phoebe Putney Memorial Hospital, just north of the Enterprise neighborhood and downtown Albany and accessible by the city’s transit system. Federally-qualified community health centers, such as those operated by Albany Area Primary Health Care, are also located across the city, and offer a range of health, dental, and mental health services with sliding scale fee programs for qualifying residents. Participants in the Community Health Needs Assessment identified access to healthcare for uninsured residents and availability of providers serving these residents as barriers to accessing healthcare in the region.

“We have a lot of people who come to us who may be homeless with mental health issues. That is really prominent from the calls we get. We refer them to other agencies who handle mental health. We see the same people coming back. They are walking the streets and can’t seem to get help. Help they need may not be available.”

-Stakeholder

Disparities exist across the city regarding access to health insurance. Residents in east and central Albany tend to be uninsured at the highest rates in the region (20.3% to 31.1% uninsured residents in six census tracts), while west Albany census tracts have the lowest percentage of insured residents (4.3% to 6.1% uninsured in three census tracts, see Figure 35). Participants in the Community Health Needs Assessment noted that the cost of health insurance and out of pocket expenses are barriers to accessing healthcare.

Overall, healthcare access is shaped by multiple factors, including availability of providers, health insurance coverage, and access to vehicles or other transportation options. Programs designed to increase access to healthcare may help support access for underserved residents. These may include mobile clinics, development of community-based clinics in underserved areas,

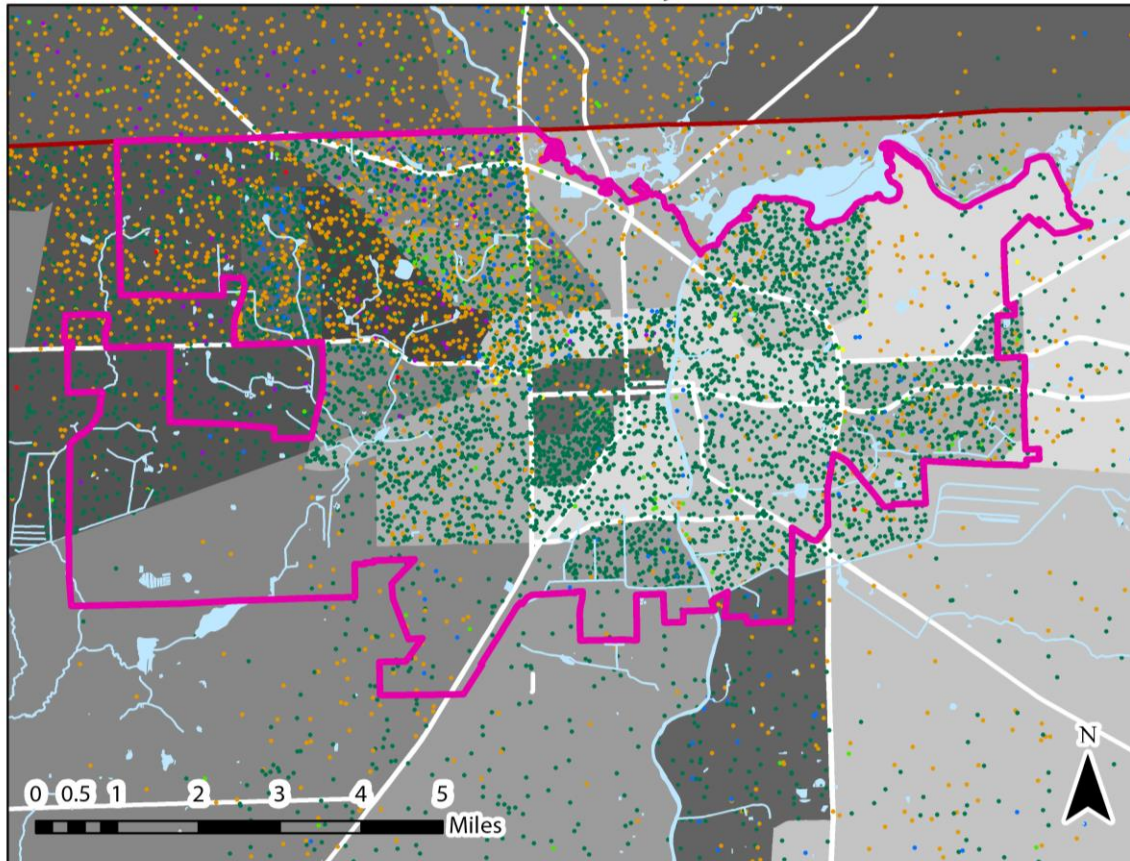
²² All data on provider ratios was obtained from County Health Rankings & Roadmaps (www.countyhealthrankings.org). Data on number of primary care physicians is from the American Medical Association Area Health Resource File (2017); data for number of dentists is from the Area Health Resource File/National Provider Identification file; and data for mental health providers is from the Centers for Medicare and Medicaid Services, National Provider Identification.

²³ Phoebe Putney Memorial Hospital. (2020). Community Needs Assessment. Retrieved from: <https://www.phoebehealth.com/health-matters/building-healthy-communities>

transportation assistance to support access to healthcare, community health workers, and sliding scale services for low-income uninsured residents, among others. Residents who participated in this planning process emphasized the need for public health education and for additional health clinics, including a sickle cell clinic and a Black maternal health center.

Figure 26. Access to Health Insurance and Race/Ethnicity

Health Insurance + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2015-2019

Percent of Population Without Health Insurance



Race + Ethnicity

1 Dot = 10 People



Chapter 6. Housing Profile

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.²⁴ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.²⁵ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²⁶

This section discusses the existing supply of housing in Albany. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

Housing Supply Summary

According to the 2015-2019 American Community Survey (ACS), there are 33,828 housing units in Albany. Since the year 2000, the number of housing units in Albany has increased 5.5%. In the Albany metropolitan statistical area (MSA), consisting of Baker, Dougherty, Lee, Terrell, and Worth counties, the number of housing units has increased at the same rate as units in the city of Albany, 5.5%. Albany's vacancy rate is 16.8%, a figure that has increased 6.1 percentage points since 2000. Vacancies in the city are higher than in the MSA, where the vacancy rate is 15%. The vacancy rate, calculated from ACS data, includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Therefore, the actual number of rental and for-sale units that are available for occupancy are likely lower than these figures indicate.

²⁴ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

²⁵ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

²⁶ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

Table 8. Housing Units by Occupancy Status

	2000	2010	2015-2019	2000-2019 Change
Albany				
Total Housing Units	32,062	33,246	33,828	+5.5%
Occupied Housing Units	28,620	29,130	28,156	-1.6%
Vacant Housing Units	3,442	4,116	5,672	+64.8%
Vacancy Rate	10.7%	12.3%	16.8%	+6.1% points
Albany MSA				
Total Housing Units	63,755	66,272	67,238	+5.5%
Occupied Housing Units	57,403	58,366	57,139	-0.5%
Vacant Housing Units	6,352	7,906	10,099	+59.0%
Vacancy Rate	9.9%	11.9%	15.0%	+5.1% points

Data Source: 2000 Decennial Census, 2006-2010 and 2015-2019 5-Year ACS, Tables H003, DP04

Housing structure variety is important in providing housing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

The table that follows shows housing units by structure types in Albany. Single-family detached homes make up the largest share of all housing unit types (58%), followed by duplexes, triplexes, and quadrplexes (23%). Approximately 11% of Albany’s housing units are small, multifamily developments. Single-family attached units, large multifamily units, and mobile homes each make up less than 4% of the city’s housing stock. The Albany MSA has a slightly larger percentage of single-family detached homes (63.7%) compared to the city of Albany. Mobile homes are also more predominant in the MSA, comprising 11.4% of the MSA’s housing units. All other housing types, including all multifamily housing types, occur at higher rates in Albany than in the MSA.

Table 9. Housing Units by Structure Type

Units in Structure	Albany		Albany MSA	
	Number	Percent	Number	Percent
1, detached	19,659	58.1%	42,819	63.7%
1, attached	1,199	3.5%	.1,555	2.3%
2-4	7,811	23.1%	9,500	14.1%
5-19	3,538	10.5%	4,763	7.1%
20 or more	835	2.5%	949	1.4%
Mobile home	777	2.3%	7,643	11.4%
Other (RV, boat, van, etc.)	9	>0.1%	9	>0.1%
Total	33,828	100.0%	67,238	100.00%

Data Source: 2015-2019 5-Year American Community Survey, Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. However, market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 9 shows the city’s housing units by the number of bedrooms and resident tenure (whether the occupants are renters or owners). In Albany, over three-fourths (77%) of all owner-occupied units have two or three bedrooms. Larger, four-bedroom units make up 22% of the city’s owner-occupied housing stock. Less than 2% of all homeowner units have 0-1 bedrooms. Renter-occupied housing is also largely composed of 2-3 bedroom units (78%). Around 13% of renters live in one-bedroom units, while only 6% live in units with four or more bedrooms. Efficiency apartments make up the smallest share of rental housing (3.1%).

Trends in regional housing sizes largely reflect the size trends found in Albany. However, the five-county MSA contains a larger share of units with four or more bedrooms. In the MSA, 26% of homeowners and nearly 9% of renters live in a unit with four or more bedrooms. Due to the MSA’s higher percentage of large housing sizes, larger families might find more appropriately sized housing for purchase and for rent in the greater Albany MSA.

Table 10 – Housing Units by Size and Tenure

Number of Bedrooms	Albany		Albany MSA	
	Number	Percent	Number	Percent
Owner-Occupied Housing Units				
Zero	32	0.3%	69	0.2%
One	108	0.9%	247	0.8%
Two or three	8,716	76.7%	22,677	72.8%
Four or more	2,509	22.1%	8,162	26.2%
Total	11,365	100.0%	31,155	100.0%
Renter-Occupied Housing Units				
Zero	519	3.1%	625	2.4%
One	2,194	13.1%	2,740	10.5%
Two or three	13,051	77.7%	20,403	78.5%
Four or more	1,027	6.1%	2,216	8.5%
Total	16,791	100.0%	25,984	100.0%

Note: Unoccupied units are not included in this table because tenure data is not available for these units.

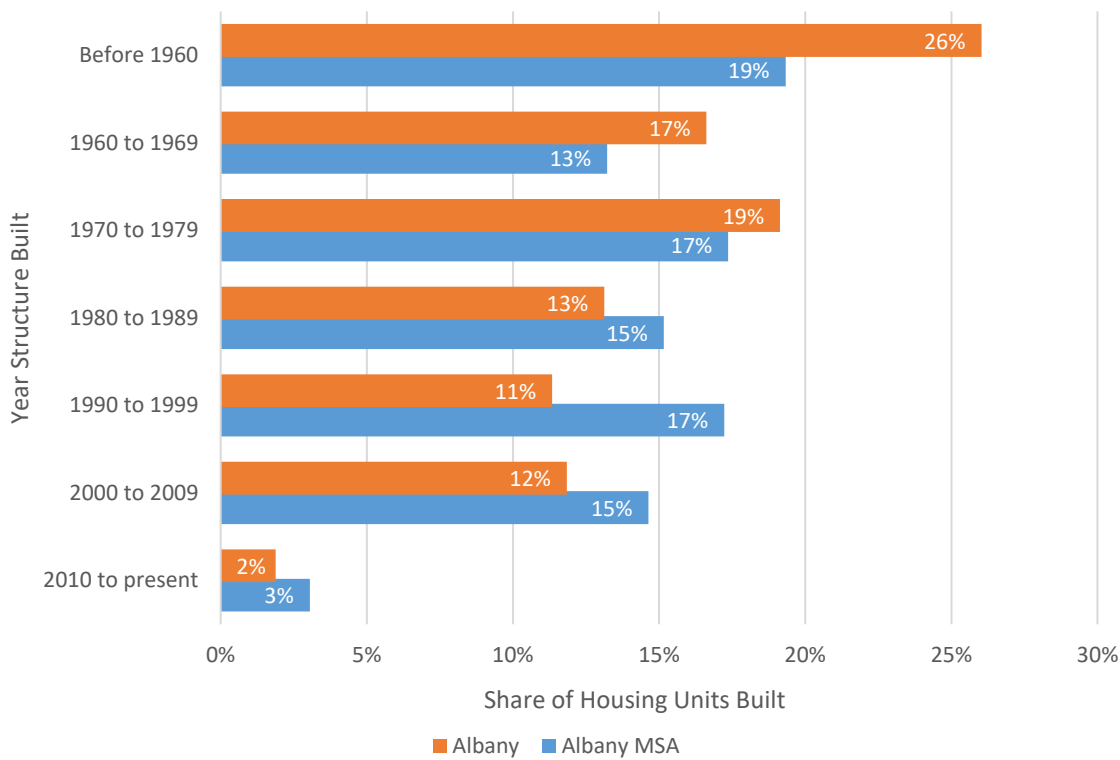
Data Source: 2015-2019 5-Year American Community Survey, Table B25042

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area’s housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a

neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

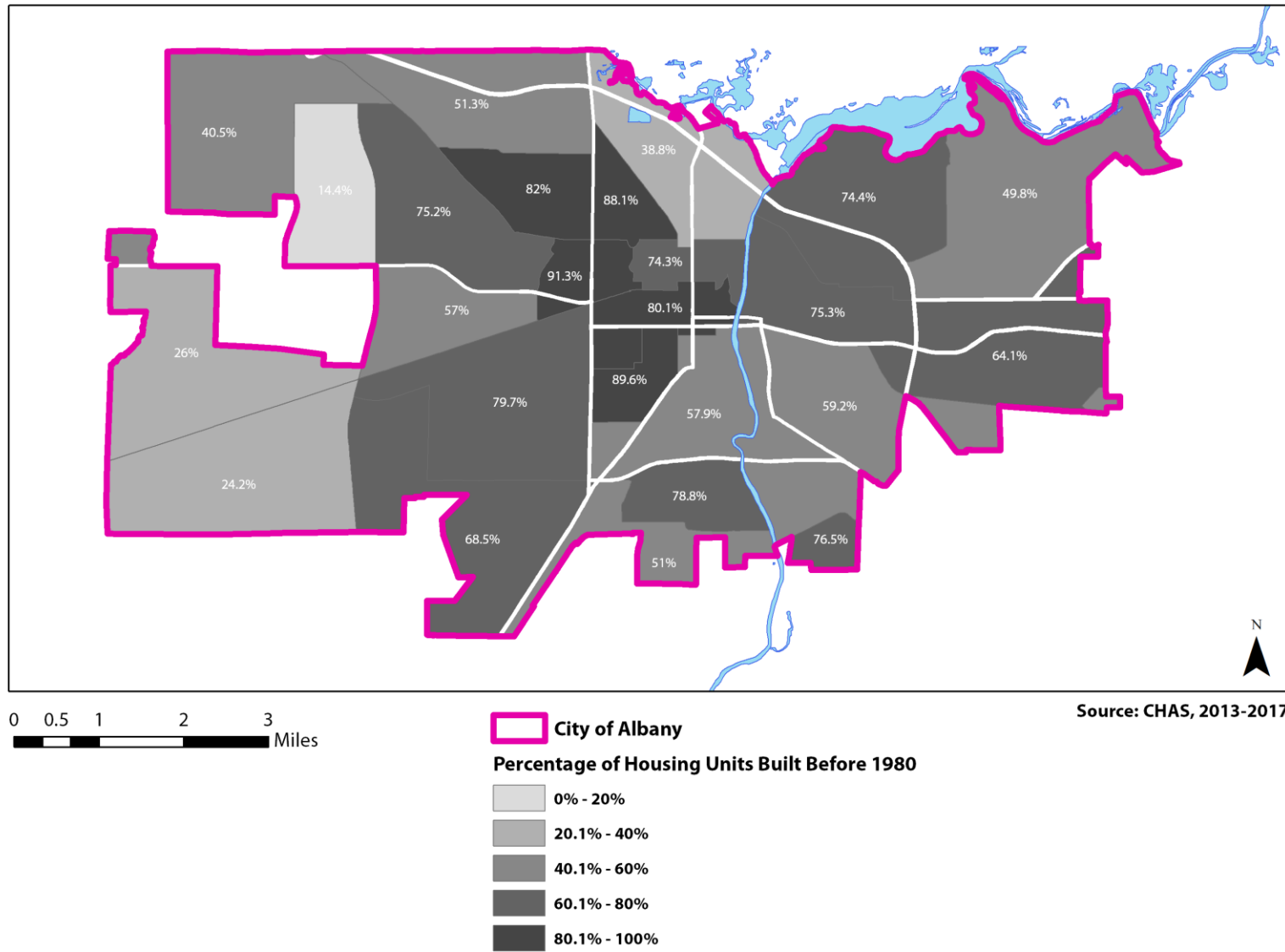
Age of housing in Albany is shown in Figure 35 below. Census records indicate that the largest share of housing units was built prior to 1960 (26%). The second greatest spurt occurred between 1970 and 1979 (19%). Much of the housing in the five-county MSA is newer than housing of Albany, with only 19% of housing units in the MSA built before 1960 and a comparable 17% built between both 1970-1979 and 1990-1999. The MSA also experienced slightly more development during the 1980s (+2 percentage points) and 2000s (+3 percentage points) than the city of Albany. Figure 36 maps housing in the region based on the percentage of units built before 1980. The greatest share of the housing units built before 1980 is clustered around N. Slappey and S. Slappey Blvd, with increasing shares of newer housing expanding from this corridor.

Figure 27. Age of Housing in Albany and the Albany MSA



Data Source: ACS 5-Year Estimates, 2014-2018

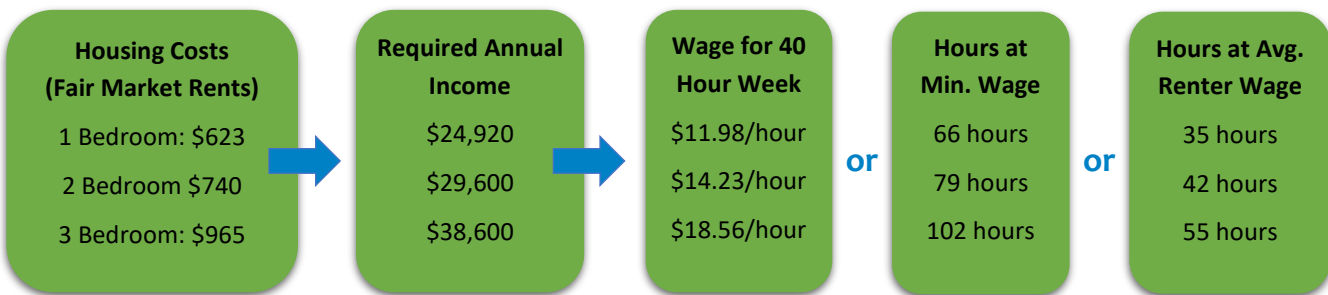
Figure 286. Age of Housing in Albany



Housing Costs and Affordability

Housing affordability is often the most common housing need, particularly for low- and moderate-income households. The National Low Income Housing Coalition’s annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. Figure 36 below shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in the Albany MSA for one, two, and three-bedroom rental units. Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market.

Figure 29. Required Income, Wages, and Hours to Afford Fair Market Rents in the Albany MSA, 2020



Note: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. Minimum wage in Albany is \$7.25. Average renter wages are \$13.75 in the Albany MSA.

Source: National Low Income Housing Coalition *Out of Reach* 2020, Accessed from <https://reports.nlihc.org/oor/georgia>

A two-bedroom rental unit – one of the predominate rental unit types in Albany – would cost a household \$740 per month. To afford this rent without being cost burdened (i.e., spending more than 30% of income on housing), a household would require an annual income of at least \$29,600. This amount translates to a 40-hour work week at an hourly wage of \$14.23. For a single minimum wage worker earning \$7.25 per hour, it would take a 79-hour work week to afford a two-bedroom unit. The average renter wage in the Albany MSA is \$13.75, which is less than the hourly wage needed to afford a two-bedroom unit at fair market rent.²⁷ At average renter wages, a worker would need to work 42 hours per week to afford this unit.

A household earning average renter wages could afford a one-bedroom unit, if available, at the fair market rent of \$623. To cover the cost of the unit, the household would need an annual income of \$24,920 or higher or must work a 40-hour work week at an hourly wage of at least \$11.98. However, if a worker earned minimum wage, he or she would need to work 66 hours per week to afford a one-bedroom unit.

Overall, this data indicates that low incomes make housing at fair market rents are unaffordable to individuals earning the minimum wage and, in some cases, even the average renter wage in the Albany MSA. Individuals earning average renter wages and working a 40-hour work week are unable to afford a two-bedroom housing unit at fair market rent, which has implications for families of all sizes, but especially larger families and single-parent families.

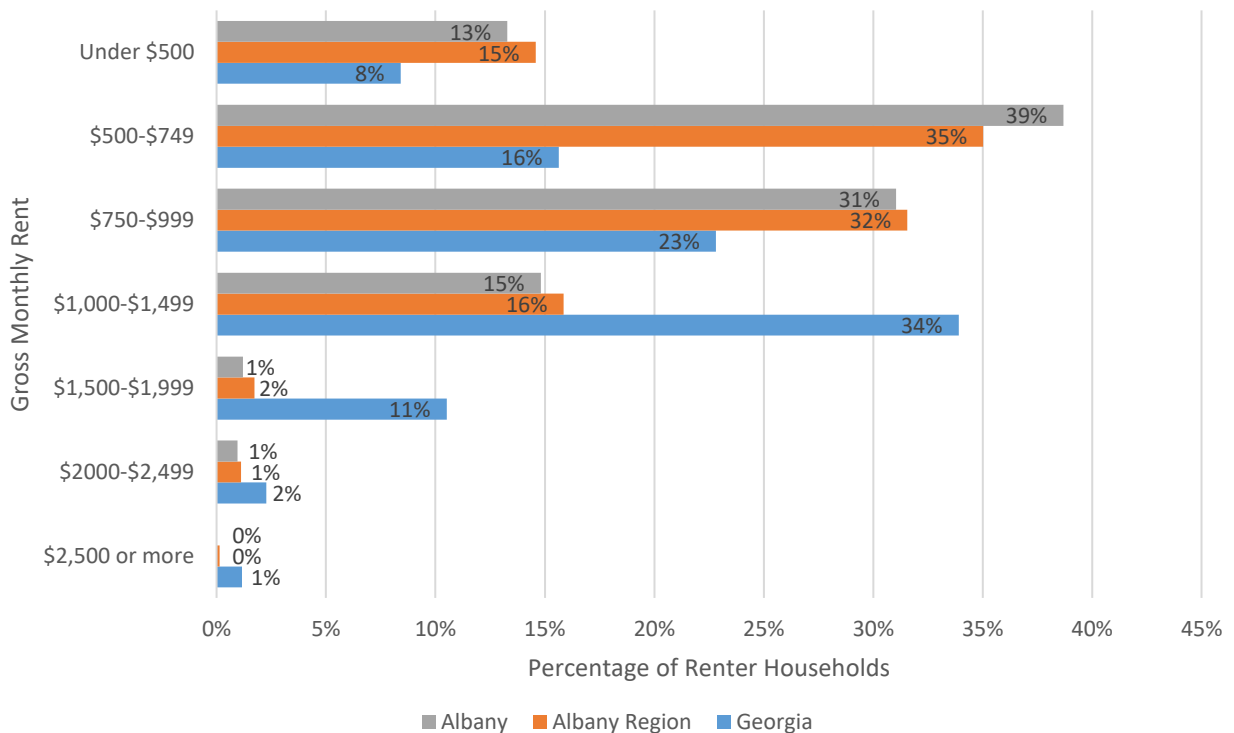
²⁷ It should be noted that the average renter wage referenced here was derived by the National Low Income Housing Coalition from the Bureau of Labor Statistics’ Quarterly Census of Employment and Wages data for the purpose of evaluating local housing affordability.

Housing Costs

The U.S. Census provides estimates of rents and monthly owner costs by jurisdiction. Figure 37 below shows Albany’s gross rent estimates for 2019. More than half (52%) of Albany’s rental units cost no more than \$749 per month. Thirteen percent of all renter units cost less than \$500 per month. For those households earning the average renter wage in Albany (\$13.75/hr.), census estimates indicate that Albany and the Albany MSA have a larger share of rental units under \$749 than Georgia overall, where only 24% of all units rent for \$749 or less.

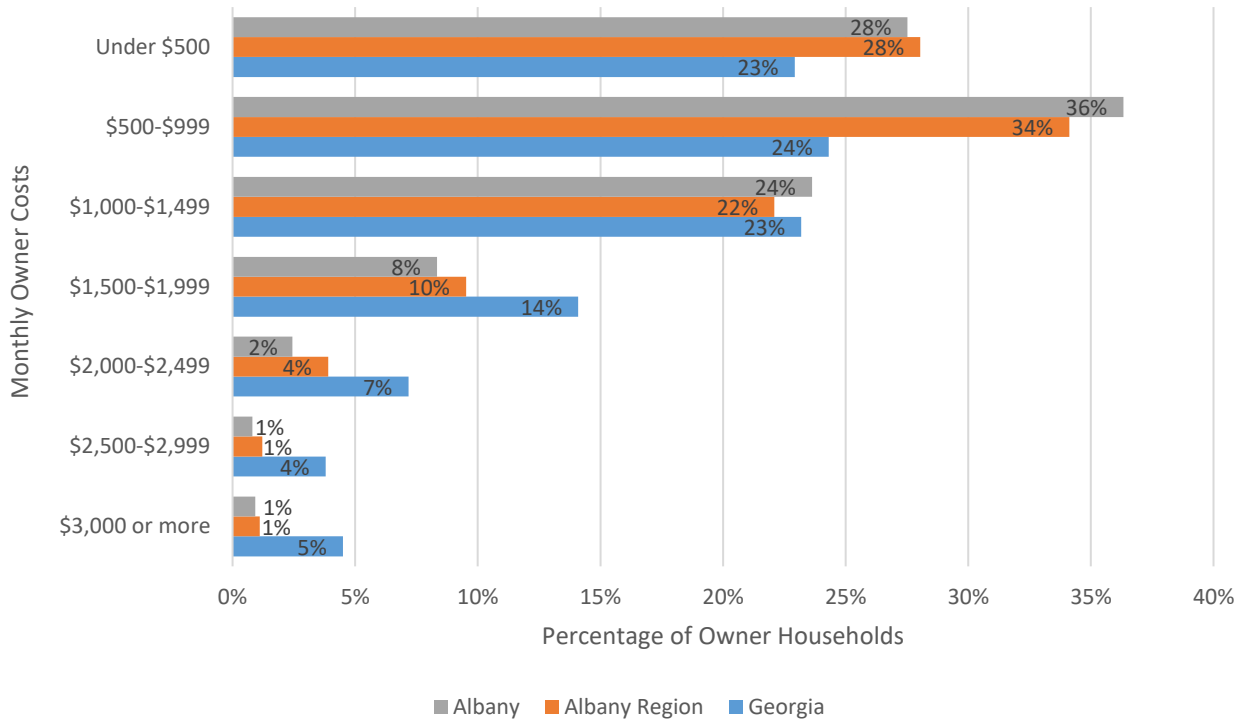
Comparatively, nearly two-thirds (64%) of Albany’s homeowners spend less than \$999 on housing costs, as do 62% of all homeowners in the MSA. Twenty-eight percent (28%) of homeowners spend \$500 or less on housing costs in both the city and MSA. These costs are more in line with homeowner costs throughout Georgia, where 47% of homeowners spend less than \$999 on housing costs, and nearly one-quarter of homeowners (23%) spend less than \$500. Homeowner costs in the city and MSA indicate that a large share of housing is considered affordable.

Figure 30. Gross Rent for Renter Households in Albany and the Albany MSA



Data Source: ACS 5-Year Estimates, 2015-2019, Table B25063

Figure 31. Monthly Owner Costs for Owner Households with a mortgage Albany and the Albany MSA



Data Source: ACS 5-Year Estimates, 2015-2019, Table B25094

Housing Needs

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

- A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
- A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
- A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau’s American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Albany and the Albany MSA is provided in the tables that follow.

Over 40% of Albany's households (11,684 households) have at least one housing problem. Approximately 24% of households (6,825 households) have a severe housing problem. Both housing problems and severe housing problems occur at lesser rates in the MSA, where 33.5% of households have a housing problem and 18.7% have a severe housing problem.

Looking at housing needs by the race and ethnicity of the householder, housing problems affect 28.3% of the city's 7,380 white households. Around one-third (33%) of the city's Asian households have a housing problem, as do 41% of Other, non-Hispanic households, 45% of Hispanic households and 46% of Black households. Native American households in Albany have disproportionately higher rates of housing problems than the city's average, with 62% of Native American households experiencing a housing problem. While it should be noted that all groups experience high rates of housing problems, Black households make up largest number of households with housing problems. 77% of all households experiencing housing problems in Albany are headed by a Black householder, while 18% are headed by a White householder.

Looking at severe housing needs by race and ethnicity of the householder, Native American households experience the lowest rate of severe housing need (10%), followed by White households (17%). Among all other racial and ethnic groups, more than one-quarter of these households have a severe housing problem. Twenty-seven percent of Black households have a severe housing problem, as do 28% of Hispanic households, 30% of Other, non-Hispanic households, and 33% of Asian households. Here again, Black households make up the largest number of households with severe housing problems, comprising around 78% of all Albany households with a severe housing problem.

Table 10 also shows rates of housing need based on the size of the household. In Albany, 62% of all large families experience at least one housing problem. 43% of non-family households and 37% of small family households also have a housing problem. These rates are relatively lower in the five-county MSA, where 52% of large families, 39% of non-family households, and 28% of small families have housing problems.

Looking specifically at one severe housing problem – severe housing cost – sheds light on those households that spend more than 50% of their monthly income on housing costs. Approximately 21% of all Albany households (6,905 households) experience severe housing cost burden. Asian households are identified as having disproportionately greater rates of severe cost burden, affecting 33% of Asian households. Around one-third (31%) of Other, non-Hispanic households and 24% of Black households are also severely housing cost burdened. Comparatively, only 16% of Hispanic households, 14% of White households, and 10% of Native American households spend more than 50% of their monthly income on housing costs. In the Albany MSA, Other, non-Hispanic households experience the highest rate of severe cost burden (31%) with Native American households experiencing the lowest rate (4%).

Table 11 also discusses severe housing cost burden by household size. Non-family households have the greatest rate of severe cost burden in the city (28%). More than one-quarter (26%) of large families spend more than 50% of their monthly income on housing, while this figure drops to 19% for small families. Severe cost burdens affect fewer households of all sizes in the Albany MSA, with 25% of non-families, 22% of large families and 14% of small families being severely cost burdened.

The maps below indicate the prevalence of housing problems in Albany, along with population by race, ethnicity, and national origin. East Albany experiences the highest rate of housing problems, with more than 50% of all census tracts located on the eastern bank of the Flint River experiencing at least one housing problem. The three census tracts immediately east of the river (Tracts 2, 103.02, and 107), are primarily populated by Black residents. The Black population in these tracts ranges from 91% to 97%. While these areas do not contain the city's oldest housing stock, they are characterized by having between 59% and 75% of their housing stock built before 1980. These tracts also have some of the city's lowest median incomes, ranging from \$19,083 in Tract 2 (which contains most of E. Broad Avenue) to \$23,779 in Tract 107 (which contains Albany State University). Furthermore, the East Albany Revitalization Plan further that this area has experienced a decline in population (-5.9% since 2000) and that the

remaining population experienced an unemployment rate of 7.1% prior to the COVID-19 pandemic.²⁸ A confluence of these economic, housing and demographic characteristics may be the source of this area’s high rate of housing problems.

Census data indicates that Albany residents from other countries of origin live almost entirely in west Albany. Tract 4, which contains the Albany Mall and a large portion of Liberty Expressway, is home to a large share of the city’s Indian and Mexican population. Here, approximately 42% of all households have a housing problem. Approximately 50% of the housing units in Tract 4 were built prior to 1980. However, the tract’s median income is \$40,688, indicating that residents here may have a greater capacity to address housing problems than in areas with lower median incomes.

Table 11. Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	Albany			Albany MSA		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	2,090	7,380	28.3%	5,795	25,565	22.7%
Black, Non-Hispanic	9,045	19,835	45.6%	12,537	29,552	42.4%
Asian or Pacific Islander, Non-Hispanic	85	255	33.3%	167	472	35.4%
Native American, Non-Hispanic	65	105	61.9%	65	234	27.8%
Hispanic	255	565	45.1%	487	1,220	39.9%
Other, Non-Hispanic	144	347	41.5%	260	571	45.5%
Total	11,684	28,487	41.0%	19,311	57,614	33.5%
Household Type and Size						
Family households, <5 People	5,555	15,030	36.9%	9,580	34,054	28.1%
Family households, 5+ People	1,240	2,005	61.8%	2,233	4,295	52.0%
Non-family households	4,895	11,455	42.7%	7,505	19,280	38.9%
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	1,165	7,380	15.8%	2,845	25,550	11.1%
Black, Non-Hispanic	5,300	19,830	26.7%	7,295	29,549	24.7%
Asian or Pacific Islander, Non-Hispanic	85	255	33.3%	153	472	32.4%
Native American, Non-Hispanic	10	105	9.5%	10	234	4.3%
Hispanic	160	565	28.3%	283	1,236	22.9%
Other, Non-Hispanic	105	347	30.3%	174	569	30.6%
Total	6,825	28,482	24.0%	10,760	57,610	18.7%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS, Tables 1, 4, 2

²⁸ City of Albany. (November 2017) “East Albany Revitalization Plan.” p. 17, 21



Table 12. Demographics of Households with Severe Housing Cost Burdens

	Albany			Albany MSA		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	1,045	7,385	14.2%	2,574	25,565	10.0%
Black, Non-Hispanic	4,755	19,840	23.9%	6,554	29,555	22.2%
Asian or Pacific Islander, Non-Hispanic	85	255	33.3%	128	466	27.5%
Native American, Non-Hispanic	10	100	10.0%	10	229	4.4%
Hispanic	90	565	15.9%	170	1,235	13.8%
Other, Non-Hispanic	110	350	31.4%	180	580	31.0%
Total	6,095	28,495	21.4%	9,616	57,630	16.7%
Household Type and Size						
Family households, <5 People	2,919	15,315	19.1%	4,673	34,484	13.6%
Family households, 5+ People	455	1,725	26.4%	857	3,859	22.2%
Non-family households	2,689	9,480	28.4%	4,077	16,626	24.5%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or MSA, except household type and size, which is out of total households. The # of households is the denominator for the % with problems and may differ from the # of households for the table on severe housing problems.

Source: CHAS, Tables 9, 7

Figure 32. Housing Burden and Race and Ethnicity in Albany

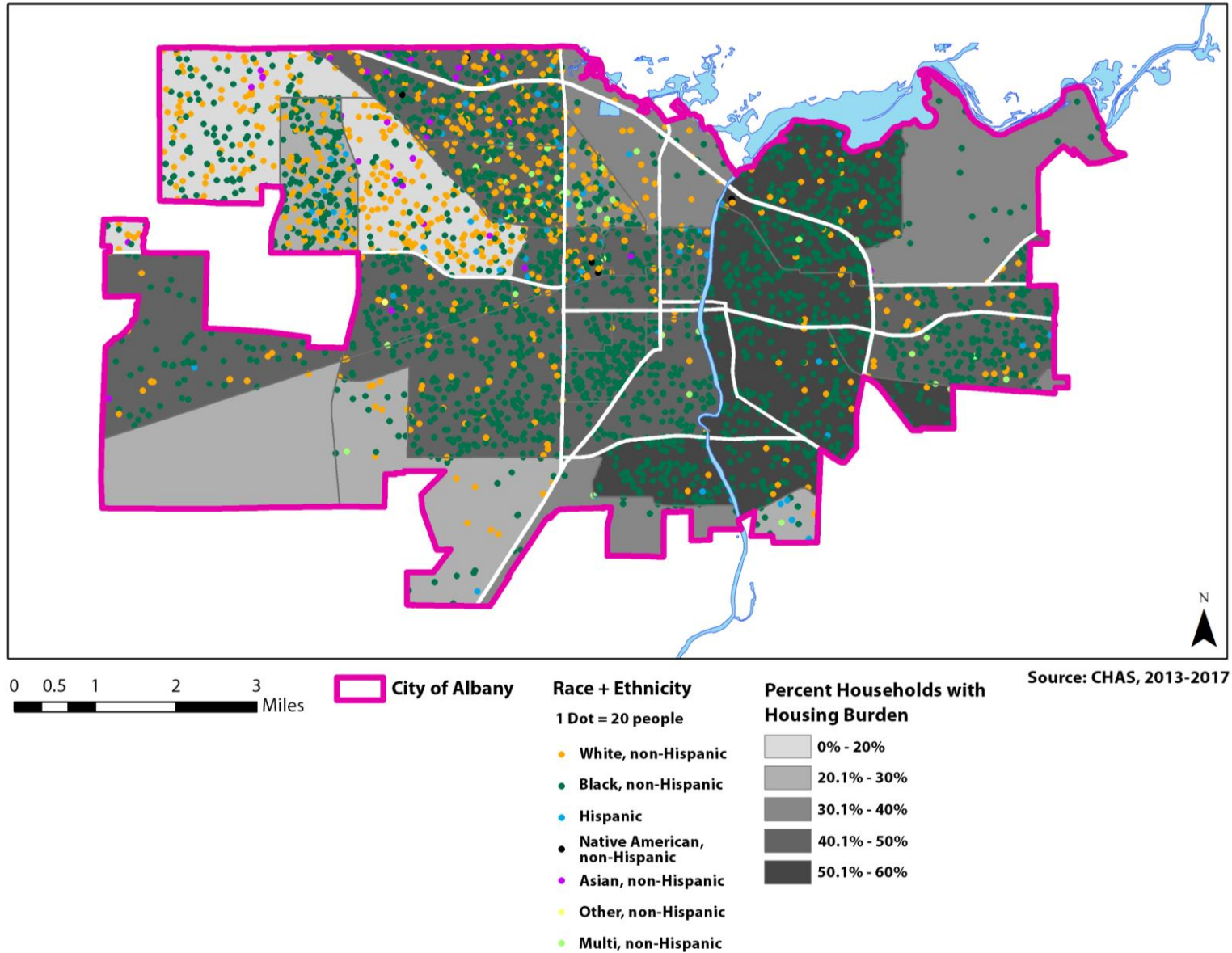
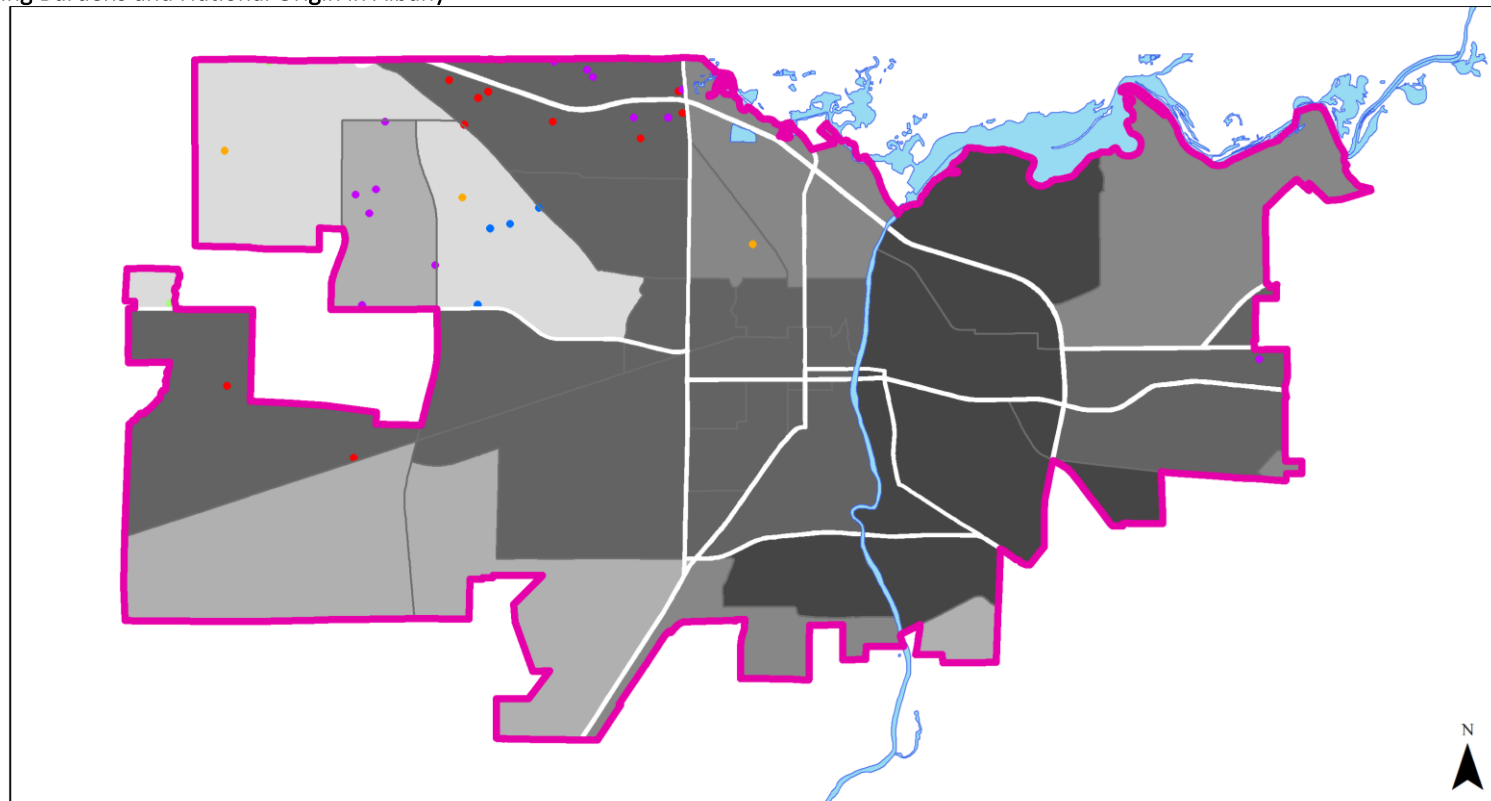


Figure 33. Housing Burdens and National Origin in Albany



Source: CHAS, 2013-2017

0 0.5 1 2 3 Miles

City of Albany
National Origin (Top 5 most populous)

1 Dot = 20 people

- The Philippines
- Korea
- Ghana
- Mexico
- India

Percent Households with Housing Burden

- 0% - 20%
- 20.1% - 30%
- 30.1% - 40%
- 40.1% - 50%
- 50.1% - 60%

Homeownership and Lending

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,²⁹ and is correlated with positive cognitive and behavioral outcomes among children.³⁰

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.³¹

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.³²

The table that follows shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for Albany. Overall, Albany has a low homeownership rate. Only 39% percent of all householders own their homes in Albany. The highest rates of homeownership are held by white, Non-Hispanic households (61.9%). The city's Asian and Hispanic households own homes at similar rates of around 40%. Homeownership rates drop to 35% for Native American households, 30% for Black households and 19% for Other, Non-Hispanic households. Homeownership rates are higher in the MSA overall (55%) as well as for nearly all racial and ethnic groups in the five-county region. Increased rates of homeownership occur for white households (73%), as well as Asian households (59%), Hispanic households (52%), Black households (39%) and Other, non-Hispanic households (37%). Native American households are the only group that experiences a decline in homeownership rates in the region (down to 26%).

The maps that follow show the share of owners and renters by census tract in Albany. Renting is most common in census tracts 8 and 114, which contain downtown Albany and several of the city's public housing developments. In these tracts, the rate of renter-occupied units reaches 81%. Thirteen additional census tracts surrounding downtown have renter rates between 60% and 80%. Renter rates are lowest in west Albany, particularly in tracts 5.02, 104.01, 104.03, and 105 where renter rates do not exceed 30%. Conversely, homeownership rates are greatest in tract 5.02, west of Dawson Road (83%). Homeownership rates also reach more than 77% in the city's northwest corner containing Old Dawson Road and the Doublegate Country Club.

29 Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

30 Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

31 U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

32 Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf



Table 13. Homeownership and Rental Rates by Race and Ethnicity

Householder Race/Ethnicity	Albany			Albany MSA		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic						
White	4,575	2,810	61.9%	18,715	6,850	73.2%
Black	5,975	13,865	30.1%	11,545	18,010	39.1%
Asian	100	155	39.2%	274	192	58.8%
Native American	35	65	35.0%	59	170	25.7%
Other	65	285	18.6%	215	365	37.1%
Hispanic	225	340	39.8%	640	595	51.8%
Total	10,975	17,520	38.5%	31,448	26,182	54.6%

Note: Data presented are number of households, not individuals.

Source: CHAS Table 9

Figure 34. Share of Households that are Owners in Albany

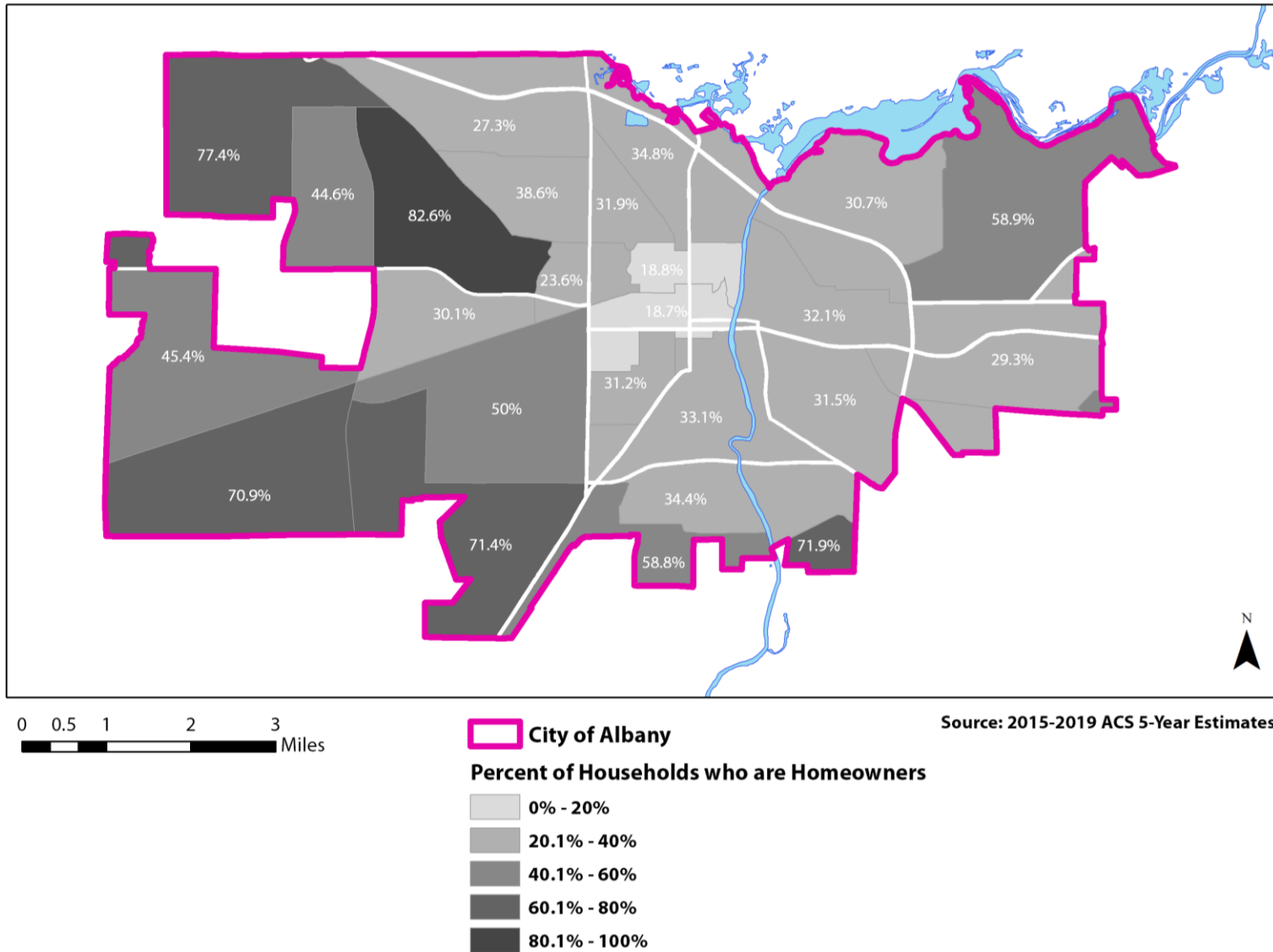
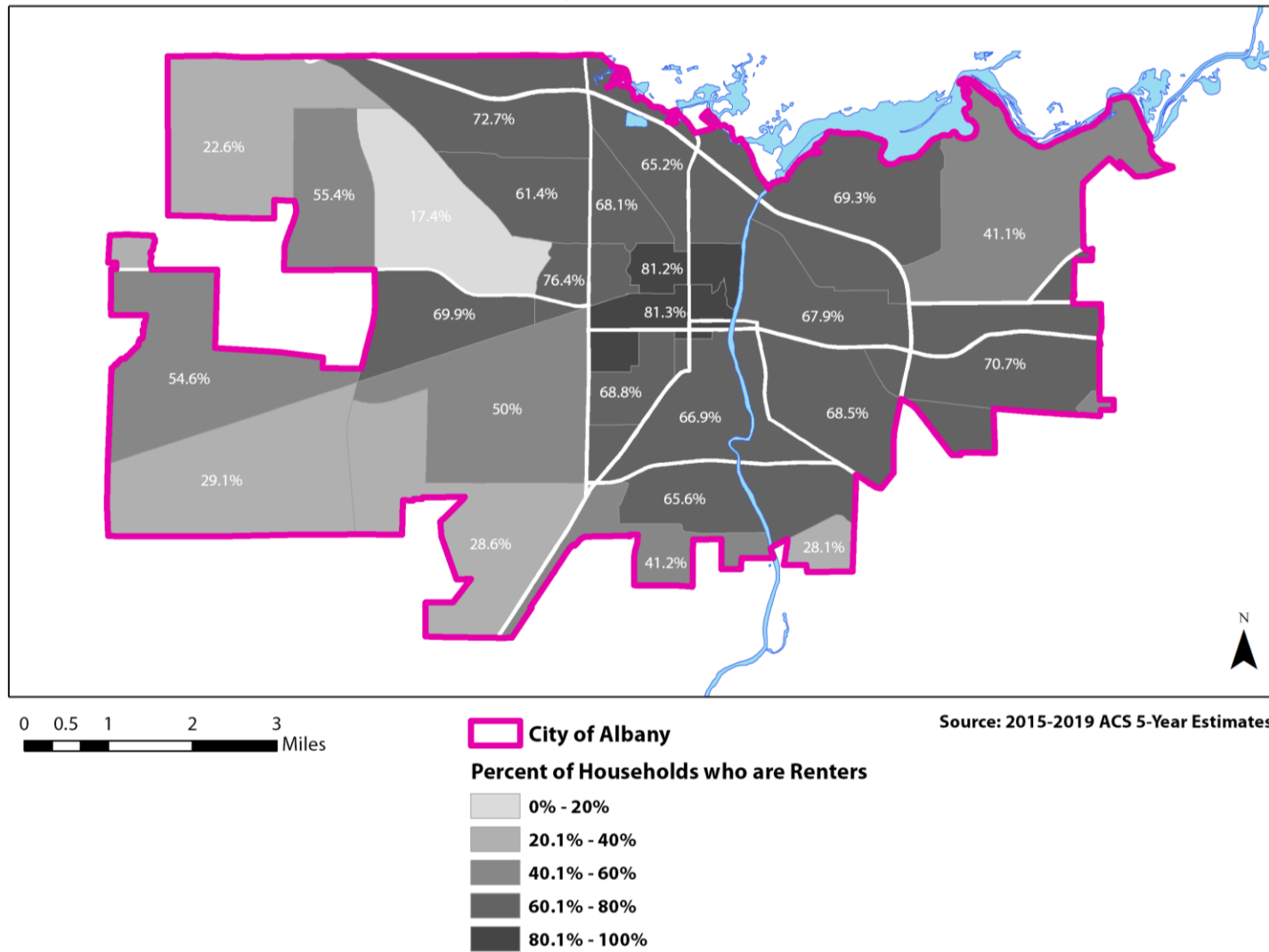


Figure 35. Share of Households that are Renters in Albany



Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2019 HMDA data consists of information for 15.1 million home loan applications reported by 5,508 home lenders, including banks, savings associations, credit unions, and mortgage companies.³³ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts in Albany for 2019, which includes a total of 971 home purchase loan application records.³⁴ Within each record, some data variables are 100% reported: "Loan Type," "Loan Amount," and "Action Taken," for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. Records where race/ethnicity information was not provided by the applicant in a mail, internet or telephone application have been included in the "all applicants" column but omitted from race and ethnicity columns. Where no applicant income was indicated, these records have been omitted from the low, middle- and high-income rows but included in the final "all applicants" row.

Of total mortgage loan applications during the year examined, 16.8% were denied. There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 7.4% of home purchase loan denials and 21.4% of refinance loan denials. Research has shown that differences in denial rates among racial or ethnic groups can arise from credit-related factors not available in the HMDA data.³⁵ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution's compliance with fair lending laws.

Complete information about applicant race, ethnicity, and income is available for 782 purchase loan applications, or about 81% of all applications. Thirty-nine percent of applications were submitted by White applicants and 37% were submitted by Black applicants. Hispanic applicants made up 2%, followed by other, non-Hispanic applicants at 1.4% and Asian applicants at 0.6%. Compared to overall population shares, this breakdown indicates that white households are overrepresented among loan applications relative to their population citywide (39% of loans versus 21% of the population). Conversely, Black residents make up a smaller share of the loan applicant pool than they do the city's population (37% of loans versus 74% of the population). Asian, Hispanic and Other non-Hispanic residents have loan application rates similar to their share of the population.

³³ Consumer Financial Protection Bureau. "FFIEC Announces Availability of 2019 Data on Mortgage Lending." June 24, 2020. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2019-data-mortgage-lending/>

³⁴ Includes applications for the purchase or refinance of one-to-four single family dwellings in which the property is or will be occupied as the owner's principal dwelling and in which the mortgage will be secured as first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

³⁵ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. "The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act." Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

The table below shows loan approval rates for completed loan applications by race and ethnicity at various income levels.³⁶ For the city of Albany, the median income in 2019 for a family of four was \$53,386. The income tiers below represent low-to-moderate income applicants earning up to 80% AMI (\$42,709), middle income applicants earning between 80% to 120% AMI (\$42,709 to \$64,063), and high-income applicants earning more than 120% AMI (over \$64,063). Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

Table 14. Home Purchase Loan Approval Rates by Race and Ethnicity in Albany, 2019

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/ Hispanic	
		White	Black	Asian	Other		
Low Income	Completed Applications	78	108	2	3	6	217
	Denial Rate	14.1%	37.0%	50.0%	66.7%	16.7%	29.0%
Middle Income	Completed Applications	71	83	0	3	8	180
	Denial Rate	9.8%	27.7%	0.0%	33.3%	0.0%	20.0%
High Income	Completed Applications	213	137	4	7	4	400
	Denial Rate	7.5%	14.6%	0.0%	25.7%	0.0%	11.5%
All Applicants	Completed Applications	380	363	6	14	19	971
	Denial Rate	10.3%	24.8%	33.3%	21.4%	10.5%	16.8%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2019 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

At low incomes, 29% of all applicants were denied a mortgage. Breaking down denial figures for low-income applicants by race and ethnicity, 67% of Other, non-Hispanic applicants, 50% of Asian applicants and 37% of Black applicants were denied mortgages. Comparatively, 17% of low-income Hispanic applicants and 14% non-Hispanic White applicants had their mortgage applications denied. At middle incomes, mortgage denial rates dropped slightly to 20% overall. At this income range, one-third of Other, non-Hispanic applicants were denied mortgages, as were 28% of Black applicants. Ten percent of middle-income White applicants were denied a mortgage. No Asian or Hispanic applicants were denied mortgages at this income level.

At high incomes, just under 12% of all mortgage applications were denied. Other, non-Hispanic applicants had the highest rates of mortgage denial at high incomes (26%). Black applicants had the second highest rate of denial (15%), followed by White applicants (8%). No Asian or Hispanic applicants were denied mortgages at this income level. Looking across all income levels, Asian applicants had the highest rate of denial (33%) with two out of six Asian applicants denied a mortgage. Black applicants had the second highest denial rate, with one-quarter (25%) of the 363 applicants being denied a mortgage. Around one-fifth (21%) of the 14 Other, non-Hispanic applicants were also denied mortgages. Hispanic and non-Hispanic White applicants had the lowest rates of mortgage denial in 2019, at 10.5% and 10.3% respectively. These gaps indicate that at middle and high incomes, Black and Other, non-Hispanic applicants have reduced access to homeownership. Overall, non-white households are less likely to apply for mortgage loans than white households and less likely to have those loan applications approved. This data suggests

³⁶ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 150% MFI, and the upper income category consists of applicants with a household income above 150% MFI.

that resources are needed to expand access to homeownership, including homebuyer readiness classes or other assistance, downpayment assistance programs, and support for households in the process of applying for a loan. The City of Albany can also meet with local lenders to inform them of goals for furthering fair housing, discuss lending patterns related to homeownership identified in this AI, and build potential partnerships for expanding access to mortgages.

Zoning, Affordability, and Housing Choice

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”³⁷ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing. The following sections will explore how the zoning and land use codes in Albany impact housing affordability and fair housing choice.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts.³⁸ In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Georgia Fair Housing Act (GFHA), the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection). The FHAA prohibits both private individuals and government authorities from denying a member of a protected class equal access to housing, including through the enforcement of a local zoning ordinance that disproportionately limits housing choice for protected persons. In *Texas Department of Community Affairs v. The Inclusive Communities Project*, a 2015 landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA’s central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions.

³⁷ John M. Levy. *Contemporary Urban Planning*, Eighth Edition. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

³⁸ Local government power to regulate land use derives from the State’s expressly delegated police power, first to municipal governments and then to counties, as found in the various enabling statutes of the state constitution and Official Code of Georgia Annotated. See O.C.G.A. § 36-66-1 *et seq.* (zoning authority cities). State law grants local municipalities authority to adopt and enact local comprehensive plans, but such plans are not intended to limit or compromise the right of the governing body of any county or municipality to exercise the power of zoning. See O.C.G.A § 36-70-5.

Besides intentional discrimination and disparate impact, discrimination on the basis of disability also includes:

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments.

The Georgia Fair Housing Act permits political subdivisions to adopt local ordinances against discriminatory housing practices, but despite Georgia state law generally leaving zoning and land use regulations to local decision-making, O.C.G.A. § 8-3-220 explicitly precludes the expansion (or limitation) of fair housing rights by local jurisdictions beyond what is provided for in the state law.³⁹ Albany has adopted a Fair Housing Ordinance in compliance with state law, which is discussed later in this section.

Albany Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

Albany' treatment of these types of issues is explored and evaluated in the table and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available Zoning Ordinance for Albany was reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within the jurisdiction and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

³⁹ "A political subdivision of this state may adopt verbatim the laws against discriminatory housing practices cited in Code Section 8-3-202, 8-3-203, 8-3-204, 8-3-205, or 8-3-222 of this article as a local ordinance but may not expand or reduce the rights granted by this article." O.C.G.A. § 8-3-220.

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and Albany’ score for each issue.

Table 15. Albany Zoning Code Risk Scores

Issue	Risk Score
1a. Does the jurisdiction’s definition of “household” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive? 1b. Does the definition of “household” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?	3
2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.? 2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?	3
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements? 3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?	1
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	3
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	3
6. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2
7a. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts? 7b. Do multi-family districts restrict development only to low-density housing types?	3

Table 15. Albany Zoning Code Risk Scores

Issue	Risk Score
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	1
9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction? 9b. Is there any provision for monitoring compliance?	1
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	1
Average Risk Score	2.1

Albany’s total average risk score (calculated by taking the average of the 10 individual issue scores) is 2.1, indicating that overall there is medium risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice.

Questions 1a and 1b in Table 14 inquire about Albany’s definition of family. Under Article 5 of the city’s 2009 Zoning Ordinance, Albany defines “family” as,

“One (1) or more persons related by blood or adoption and two (2) additional persons who are unrelated occupying a housing unit and using common kitchen facilities and entrances, as distinguished from a group occupying a boarding housing, lodging house, hotel, fraternity house, sorority house or personal care home.”

Under this definition of “family,” unrelated persons residing together are not considered a family unless they reside with at least two individuals related by blood or adoption. Furthermore, the number of unrelated persons permitted to live in the household is restricted to two persons. The ordinance does not contain a unique definition of “household,” which might otherwise permit unrelated persons to live together as a unit.

Definitions of “family” impact how each jurisdiction treats persons with disabilities living together, as discussed in Questions 2a and 2b. The Departments of Justice and Housing and Urban Development have jointly established that persons with disabilities must be allowed to live together in single-family districts, even if they live in group homes. Any definition of “family” or “household” that permits unrelated individuals to live together but subjects group homes of the same size to a more rigorous review process or prohibits group homes altogether is facially discriminatory.⁴⁰

A 2012 amendment to the zoning ordinance introduced several new housing types which might serve persons with disabilities. The amendment in Section 2.01 6, called *Community Residence Requirements*, included a new definition for personal care homes and rooming, lodging and boarding houses. The amendment also expanded community housing types to include community living arrangements, community residences, recovery residences, structured housing, and transitional living facilities. Each housing type varies slightly, serving a unique group of residents. Community residence housing types are detailed below:

⁴⁰ Department of Justice and the Department of Housing and Urban Development. (November 2016) “State and Local Land Use Laws and Practices and the Application of the Fair Housing Act,” p.7-8. <https://www.justice.gov/crt/page/file/909956/download>

- **Community residences**, in which two or more unrelated adults share a dwelling unit, as well as its cooking facilities. Community residences include boarding and rooming houses, community living arrangements and personal care homes.
- **Personal care homes**, where housing and meals are provided to two or more adults under 24-hour care. The **family personal care home** also falls under this definition and covers personal care homes in a “family-type residence” for two to six adults.
- **Community living arrangements**, which cover any residence funded, in whole or in part, by the Georgia Department of Behavioral Health and Developmental Disabilities.
- **Recovery residences**, which are transitional residences for persons released from prison, jail, or mental health facilities and who require a drug and alcohol-free environment to establish or maintain their recovery. Participation in recovery-related programming is required.
- **Rooming, lodging or boarding houses**, defined as a dwelling unit in which a residing family can offer lodging and meals to two or more unrelated adults.
- **Structured housing**, which offers transitional housing to individuals released from prison, and to probationers and parolees. This housing type does not require participation in any programs or services.
- **Transitional housing facility**, where long-term – but not permanent – housing is offered to seven or more individuals without a permanent residence.

A joint statement from the Department of Justice and Housing and Urban Development describes “physical or mental impairment” as physical disabilities such as visual, speech and hearing impairments, developmental disabilities, mental illness, as well as past drug addiction and alcoholism.”

Albany’s Permitted Uses Table indicates that while several of these housing types serve persons with disabilities, few are allowed in the city’s residential zoning districts. Only family personal care homes, serving 2-6 adults in a family-type residence, are allowed by-right in the city’s R-1, R-2, R-3 and R-MHS districts. This use is excluded from the city’s R-E and R-G districts. Community living arrangements, serving persons with developmental disabilities, are not covered on the permitted uses table.

Recovery residences in Albany’s ordinance serve a unique group which, under the joint DOJ and HUD definition of “physical or mental impairment,” are considered a protected class. Currently, recovery residences are allowed only by city commission approval in the city’s C-R and C-1 districts. Limiting the placement or adding regulatory review to housing serving persons in recovery, including persons with mental illnesses, is illegal under the Fair Housing Act. Instead, where this housing type is similar to that of family personal care home (e.g. serving 2-6 residents, offered in a family-type residence, etc.) these housing types could be regulated in a similar manner.

Questions 3a and 3b inquire about each jurisdiction’s reasonable modification or accommodation processes to improve housing accessibility for persons with disabilities. Albany adopted a reasonable accommodations ordinance in 2013. The ordinance allows a person with a disability, their representative, or a developer to apply for a reasonable accommodation when a local policy has the effect of producing a barrier to fair housing. Requests for a reasonable accommodation can be determined by the city’s Planning Director through an administrative process. No public hearing or advance notice is required to make a request. The Planning Commission or Historic Preservation Commission may also decide on a reasonable accommodation where other land use or external modification requests are involved. However, none of the review processes require a public hearing. An approval is guaranteed by the board if the applicant demonstrates that:

- The reasonable accommodation will serve the residences of a disabled person,
- The accommodation is necessary to make the residence livable for the disabled person,

- The accommodation will not cause undue financial burden on the city, and
- The accommodation will not fundamentally alter the city’s laws and ordinances, including its zoning ordinance.

Question 4 inquires about spacing or dispersion requirements on protected housing types. Community residences, as defined in Section 2.01 6(g), are required to be separated by a minimum of 1,000 feet from property line to property line, following improved vehicular or pedestrian routes. These extensive spacing requirements may also have the effect of limiting housing for persons with disabilities.

Question 5 explores Albany’s zoning requirements for residential substance abuse treatment facilities. Persons in recovery from alcohol or substance abuse are considered persons with disabilities under the Fair Housing Act.⁴¹ The Act therefore requires housing for persons in recovery to be treated in the same manner as other persons with disabilities. As indicated previously, recovery residences should be treated as a protected housing type, in a similar manner to housing for other persons with disabilities. The zoning ordinance defines two recovery residence types, with an increasing intensity in services.

- **Standard Recovery Residences**, in which residents are required to attend at least one hour of substance abuse counseling or mental health counseling per week, and
- **Intensive Recovery Residences**, in which residents must attend at least 5 hours of substance abuse counseling or mental health counseling per week from a certified substance abuse counselor.

It should be noted that the Fair Housing Act does not require a person to have participated in or currently be participating in a treatment program to be considered a person with a disability.⁴² Therefore, persons in recovery may utilize this protected housing type even if they opt not to participate in required programs.

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.⁴³ Exclusionary zoning is understood to mean zoning regulations which impose unreasonable residential design regulations that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes and prevent overcrowding. Zoning policies that impose barriers to housing development by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units.

The Brookings Institution has found that “[o]n roughly 75% of land in most cities today, it is illegal to build anything except single-family detached houses. The origins of single-family zoning in America are not benign: Many housing

⁴¹ Ibid., p. 7

⁴² Ibid. p.7

⁴³ Gyourko, Joseph, Albert Saiz, and Anita A. Summers (2007) “A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index,” real.wharton.upenn.edu; Randal O’Toole. (2006) “The Planning Penalty: How Smart Growth Makes Housing Unaffordable,” at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko. (2002) “The Impact of Zoning on Housing Affordability,” law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House’s Housing Development Toolkit, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

codes used density as a proxy for separating people by income and race.”⁴⁴ Although today it may be difficult to prove that a zoning ordinance’s preference for single family zoning is facially (or intentionally) discriminatory in direct violation of fair housing laws, such land use regulations still may have the effect of artificially limiting the supply of housing units in a given area and disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive. Legitimate public objectives, such as maintaining the residential character of established neighborhoods, environmental protection, or public health, must be balanced with housing needs and availability.

Questions 6 and 7 inquire if exclusionary zoning tactics impose unreasonable design regulations or preclude the development of housing types that serve a variety of protected classes. While Albany’s regulations for minimum lot size, minimum lot widths, setbacks, building height and floor area ratio are not the most permissive, they are also not the most restrictive regulations. While the zoning ordinance contains an R-E district and R-G that contain large lot widths and setbacks, these zoning districts are rarely in use on the city’s zoning map. More common are the less dense districts, such as R-1, R-2, and R-3, where regulations tend to be more permissive. Interior side yards reach 10’ in the city’s R-1 and R-2 districts, and 5’ in R-3. Minimum lot width for single family lots in these districts ranges from 50’ (R-3) to 80’ (R-1) for interior lots.

However, these districts prove to be overly restrictive by prohibiting the construction of attached single family units (townhomes) from all single-family residential districts. As a denser development type, townhome construction may have the effect of producing more affordable units for low-income residents. Townhomes are typically allowed in single-family districts, particularly in those districts where minimum lot sizes run smaller than 1 acre. Except for duplexes, which are allowed by right in the city’s R-3 district, all other forms of multifamily housing are prohibited in single family districts. Albany can expand access to a variety of housing types by allowing attached single family and appropriately dense multifamily units in single family residential districts.

Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. These housing types are observed in Question 8. Albany permits mobile homes by right in its R-MHS (Mobile Home Single-Family District) and R-MHP (Mobile Home Park) districts. Albany also allows accessory dwelling units by right in all single-family residential districts, except for those serving mobile homes.

Finally, questions 9 and 10 complete the regulatory review, covering building codes and inclusionary zoning policies. According to the city’s website, Albany utilizes the 2018 Edition of the International Building Code (IBC). HUD identifies the 2018 IBC as one of several editions of the standard building code that is considered “safe harbors” under the Fair Housing Act, promoting the health, safety and welfare of the public through building construction. Monitoring compliance with these codes is not required but is a good practice for ensuring safe and accessible housing products. Albany offers two inclusionary zoning incentives for developers who create affordable housing. Developers to reduce the minimum required area on single-family lots by 20% by deeding the property with the following affordability criteria for at least 30 years:

- 60% of the housing units must be affordable to families earning 80% AMI, or
- 25% of the housing units must be affordable to families earning 60% AMI, or
- 10% of the housing units must be affordable to families earning 40% AMI.

Developers can also offer affordable to a mix of income levels. In this scenario, lot sizes can be reduced by 20% based on the number of affordable units created.

⁴⁴ Baca, Alex. (December 4, 2019) “Gentle” Density Can Save Our Neighborhoods,” <https://www.brookings.edu/research/gentle-density-can-save-our-neighborhoods>.



Overall, Albany’s zoning ordinance is neither the most permissive, nor the most restrictive in its approach to housing for protected classes. The city can make an additional effort to increase access to diverse housing types in low-density residential districts and reduce restrictions on group homes for persons with disabilities. However, the city’s reasonable accommodations and inclusionary zoning ordinances are also important steps towards improving access to housing for protected classes.

Local Fair Housing Ordinance

Albany adopted a fair housing ordinance in 1997 to promote the elimination of discrimination in the sale, rental, or financing of housing (see Sec. 30-19—30-39). Sec. 30-24 authorizes the City’s fair housing ordinance to be administered by the director of the City’s fair housing commission. The director is responsible for publishing reports on housing discrimination and administering programs and activities related to fair housing, including conferences with the local housing industry. The director is also responsible for receiving and investigating fair housing complaints and preparing reports with his/her findings. Individuals who have been found in violation of the fair housing ordinance may be fined between \$10,000 and \$50,000 by the courts, depending on the number of times the person has been found guilty of housing discrimination. Currently, the City’s fair housing commission, including the director position, appear to be inactive. However, the City offers fair housing workshops for the public, provides assistance through its housing counseling program, and displays a link to HUD’s fair housing complaint form on its website.

Chapter 7. Publicly Supported Housing

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.⁴⁵

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.⁴⁶ The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.⁴⁷ This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within Albany.

⁴⁵ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

⁴⁶ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

⁴⁷ Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

Supply and Occupancy

The Albany Housing Authority provides publicly supported housing to Albany residents. HUD PIC data indicates that there are 1,106 public housing units in Albany. The AHA website indicates that the housing authority maintains 18 public housing developments at 20 physical sites. The AHA also offers 57 housing choice vouchers. The Georgia Department of Community Affairs, which serves most Georgia counties with housing choice vouchers, also supplies the city and region with HCVs, as shown in Figure 43 below. Lastly, publicly supported housing is offered through Georgia’s low-income housing tax credit program (LIHTC). The HUD LIHTC database indicates that there are 1,126 LIHTC units in the city, of which 700 remain affordable units. Combined, publicly supported housing units make up figures represented by HUD make up an estimated 6.8% of all housing units in Albany.

Table 16. Publicly Supported Housing Units by Program Category

Housing Units	Albany	
	#	%
Total housing units	33,828	
Public housing	1,106	3.3%
HCV program	57	0.2%
LIHTC program	1,126	3.3%

Source: HUD PIC, LIHTC Database

Data from A Picture of Subsidized Households (APSH) provides a glimpse of the Albany Housing Authority’s racial makeup. APSH currently provides race and ethnicity data for three public housing developments: Hudson Malone Towers, William Dennis Homes, and Paul Lipsey Homes.⁴⁸ Of the 569 households captured in 2020 APSH data, 96.7% were headed by non-Hispanic Black householders, 3% were headed by non-Hispanic White householders and 0.3% was headed by a Hispanic householder. Non-Hispanic Black households make up only 70% of Albany households and 83% of Albany’s very low-income households, indicating that Black households are overrepresented in the above-named public housing developments. By comparison, White households make up 26% of the city’s population and 13% of the city’s very low-income population, indicating that White households are underrepresented in these housing developments. Hispanic residents are also slightly underrepresented in these developments, making up 2% of the city’s population but 0.3% of these public housing units.

APSH offers race and ethnicity data for several Project Based Section 8 developments, including Bethel Housing Complex, Cedar Avenue Apartments, Holley Homes, Turnkey Homes, Mt. Zion Garden Apartments and Wild Pines Apartments. Non-Hispanic Black households are slightly overrepresented in these developments, comprising 90% of these Project Based Section 8 households, while non-Hispanic White and Hispanic households are again underrepresented (at 2.5% and 0.5%, respectively). Asian households are not identified in either publicly supported housing type. Furthermore, race and ethnicity data were not available for the Albany Housing Authority’s housing choice vouchers or for the LIHTC units offered citywide.

The Albany MSA shows more disparate trends in housing based on race and ethnicity. Non-Hispanic Black households make up 96% of all public housing households and 93% of the region’s Project Based Section 8 units. Black households comprise 72% of the region’s very low-income residents, however, they make up only 51% of the MSA’s total population. Despite non-Hispanic White households comprising 44% of the region and 23% of the region’s very low-income households, they are underrepresented in public housing (4%) and Project Based Section

⁴⁸ APSH Data accredited to “Hudson Malone Towers” may also include other public housing developments in AHA’s Asset Management Project (AMP) 3 (Golden Age, Grover Cross, Seay Village). “William Dennis Homes” may also include other AMP 4 developments (Holman Homes, Sherman Oaks, Kingsbury). “Paul Lipsey Homes” may also include other public housing developments in AHA’s AMP 5 (Harvey Pate, Ernest Wetherbee, Brierwood Court, Land Landings).

8 housing (5%). Hispanic households are also underrepresented in public housing and project-based vouchers, making up less than 1% of these households, while remaining around 2% of the MSA. Asian households make up less than 1% of the region and were not identified in demographic data for any publicly supported housing development.

Table 17. Publicly Supported Housing Residents by Race/Ethnicity

Housing Type		Race/Ethnicity							
		White		Black		Hispanic		Asian or Pacific Islander	
		#	%	#	%	#	%	#	%
Albany									
Housing Type	Public Housing	17	3.0%	550	96.7%	2	0.3%	0	0%
	Project-Based Section 8	21	2.5%	765	90.1%	5	0.5%	0	0%
Household Earnings	0-30% AMI	685	12.7%	4,480	82.8%	120	2.2%	25	0.5%
	0-50% AMI	1,420	15.3%	7,505	80.9%	120	1.3%	75	0.8%
	0-80% AMI	2,270	16.1%	11,195	79.5%	275	1.9%	100	0.7%
Total Households		7,380	25.9%	19,835	69.6%	565	1.9%	255	0.9%
Albany MSA									
Housing Type	Public Housing	31	4.1%	725	95.5%	3	0.4%	0	0%
	Project-Based Section 8	55	5.1%	1,004	93.0%	10	0.9%	0	0%
Household Earnings	0-30% AMI	2,002	22.7%	6,397	72.4%	218	2.5%	47	0.5%
	0-50% AMI	3,971	26.1%	10,549	69.5%	298	1.9%	101	0.7%
	0-80% AMI	6,801	28.8%	15,809	66.9%	498	2.1%	130	0.6%
Total Households		25,565	44.4%	29,552	51.3%	1,220	2.1%	472	0.8%

Note: Data presented are number of households, not individuals.

Source: 2013-2017 CHAS, T1; APSH

Geography of Supported Housing

In the map that follows, the locations of publicly supported housing developments are represented along with the levels of Housing Choice Voucher use, which is indicated by gray shading.

The blue markers on the map indicate the locations of traditional public housing developments. The city’s public housing developments are located on the city’s south side, east side, and northwest of downtown. There are no public housing developments in the northwest corner of the city (west of S. Slappey Road, north of the Norfolk Southern rail line). The densest cluster of public housing developments is located near Hugh Mills Stadium and consists of the city’s oldest public housing - Thronateeska Homes and O. B. Hines Homes – as well as McIntosh Homes and Golden Age Apartments. To the south of W. Broad and east of S. Slappey, there are also a less dense cluster of developments, including Holley Homes, William Binns Homes, Seay Village, Seay Village North, and



William Dennis Homes. Downtown also has the Hudson Malone Towers and Grover Cross Homes near the Flint River. Smaller groupings of public housing developments are found west of Westtown Road, such as Holman Homes, Sherman Oaks, and Kingsbury Subdivision. Paul Lipsey Sr. Homes, Harvey Pate Homes, and Lane Landings are located in the city's southeast corner, east of SR 19. Finally, one development is located south of Albany State University's east campus: Ernest Wetherbee Homes.

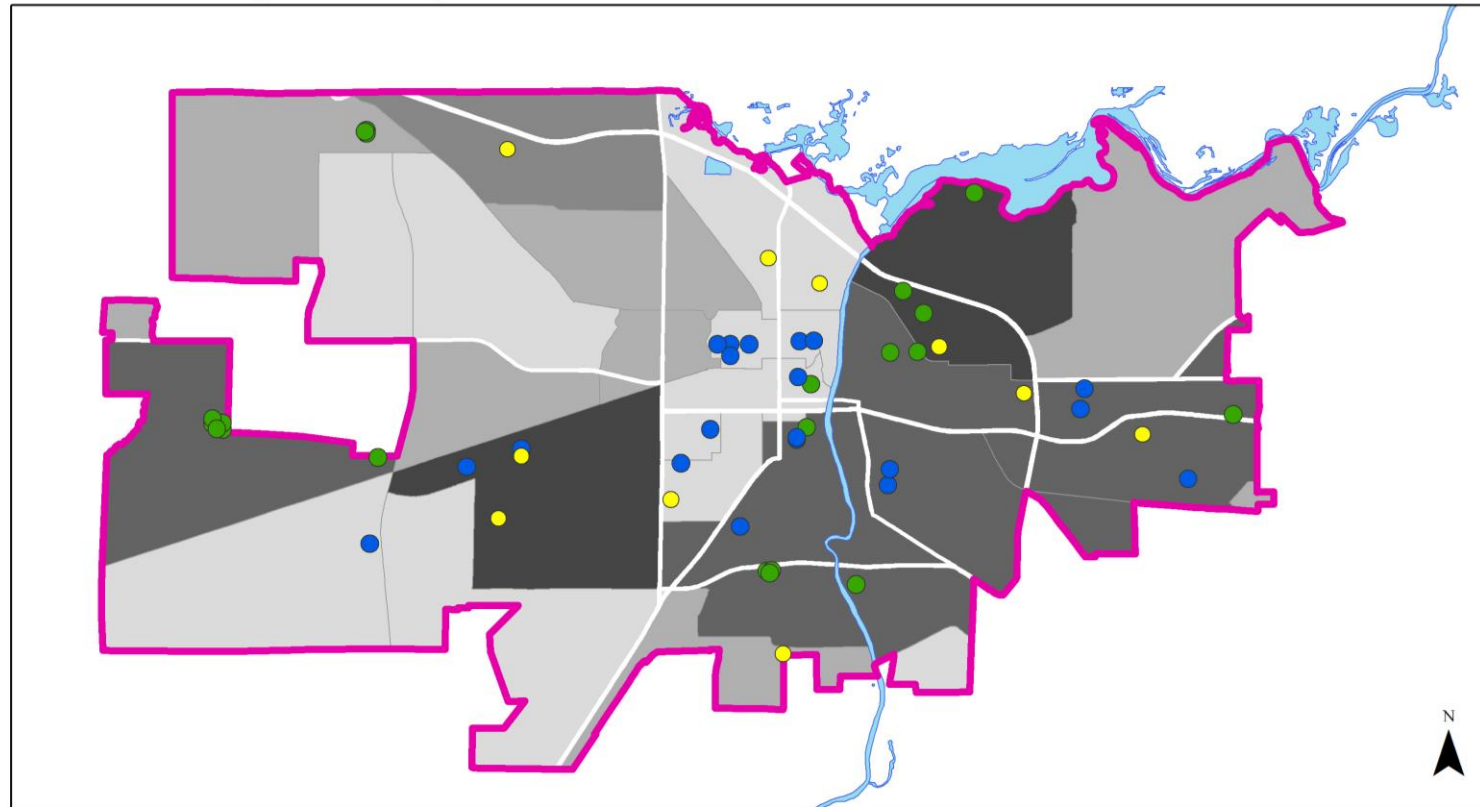
The yellow markers on the map indicate the location of Project Based Section 8 (PBRA) housing. Project Based Section 8 developments are privately owned but retain a rental subsidy with the unit. The Albany Housing I – VII developments offer housing for disabled residents in the city. These units are dispersed throughout the city, including northwest Albany near Nottingham Way, southwest Albany near S. Magnolia Street, and east Albany near S. Mock Road. Other PBRA developments are also scattered throughout the city, such as the Mt. Zion Garden Apartments in south Albany on Slater King Drive, Arcadia Commons near the Phoebe Putney Hospital, and Bethel Housing Complex on Swift St. in east Albany.

The green markers on the map indicate the location of low-income housing tax credit (LIHTC) properties provided to HUD's LIHTC database. These are primarily offered east of S. Slappey Road, with a few developments located in west Albany. A few small clusters of LIHTC units exist in areas, such as along Lockett Station Road (Carriage Lane Triplexes, Lockett Station I and II, Station Crossing), along Point North Blvd (Point North Village and Point North Senior Village) and south of W. Oakridge Road (Landing at Southlake, Bridges at Southlake, Cove at Southlake). There is also a loose cluster of LIHTC developments near Don Cutlet Sr. Drive in east Albany (which includes Rivercrest Apartments, Sunchase Apartments, and East Tift Avenue).

The number of Housing Choice Vouchers (HCVs) in use per census tract is represented by the shading on the map below. HCVs are issued to households and may be used at a rental unit of the tenant's choosing to reduce the tenant's share of rent payments to an affordable level. Therefore, unlike the publicly supported developments marked on the map, HCVs are portable and their distribution throughout the city is subject to fluctuate based on location preferences of individual voucher households and the participation of landlords in the HCV program. Data from the Picture of Subsidized Housing indicates that the greatest number of housing choice vouchers can be found in northeast Albany adjacent to Lake Chehaw (162 vouchers) and in southwest Albany near Westtown Road (134 vouchers). The fewest number of vouchers are found in those census tracts near downtown with a significant number of public housing or PBRA developments, in the south-westernmost corner of the city which has large undeveloped tracts, and in northwest Albany.

Figure 36. Publicly Supported Housing in Albany

Public Housing in Albany



0 0.5 1 2 3 Miles

- City of Albany
 - Public Housing
 - Project Based Section 8
 - LIHTC
- Number of Housing Choice Vouchers**
- 0 - 25
 - 26 - 50
 - 51 - 75
 - 76 - 125
 - 126 - 175

Source: APSH, Novogradac and Co.

Policy Review

The Albany Housing Authority (AHA) is required by HUD to complete a Five-Year PHA Plan with annual plan updates. Housing authorities are also required to maintain their admissions policies for public housing developments in a document called the Admissions and Continued Occupancy Policy, or ACOP. Admissions policies for housing choice voucher programs are maintained in an Administrative Plan. These documents set policy for who may be housed by the housing authority and how those tenant households are selected. Four aspects of the AHA's Housing Choice Voucher admissions policies are examined here: tenant selection, local preference, tenant screening, and subsidy standards. These policy types allow local determination by the AHA and are among the most central to matters of fair housing choice.

The Albany Housing Authority begins its tenant selection process for the HCV program by determining the applicant's eligibility. AHA utilizes HUD's broad definition of "family," defined as "a group of people related by blood, marriage, adoption or affinity that lives together in a stable family relationship."⁴⁹ The Admin Plan includes elderly, near-elder, disabled, and displaced families, as well as the remaining member of a tenant family or a single person in its definition of "family." Families are income-eligible for the HCV program if they are very low-income, continuously assisted low-income families, or displaced low-to-moderate income families under special circumstances. All members of an applicant family must be citizens, US nationals, or have an eligible immigration status. Families with at least one family member who does not meet eligible immigrant status are considered "mixed families," and are only eligible for special types of assistance under the non-citizen rule. Finally, applicants over the age of 6 must have a social security number or certify that they do not have one. The AHA verifies applicant income upfront in the process using HUD-recommended methods of data collection.

The Admin Plan requires AHA applicants to apply for housing in person at AHA's offices. Recent information from the AHA website indicates that applicants may now apply online while the AHA offices are closed due to the COVID-19 pandemic. The AHA also allowed for reasonable accommodations to the application process to be made for applicants with disabilities. AHA staff then file the applications first in order of local preference, then in order of the date and time the application was received. Local preferences prioritize (1) housing for displaced families (when displacement is due to natural disaster or government action), (2) elderly and disabled families and families with a stable work history, (3) families referred from homeless shelters, transitional housing, or other social service organizations, and finally (4) all other families. Within each local preference grouping, families are also moved to the front of the waiting list if members have a stable work history, work at least 20 hours per week, and has been employed for at least 90 days within the prior 6 months. Families are also sorted within each local preference group by the time and date of their application.

Once the application nears the top of the waiting list, the applicants' preference status is verified, and the family is required to attend an interview. The family will also complete a full application, provide their Social security numbers and citizenship information, and complete a Consent for Release of Information form. During this stage, AHA staff will review pertinent information about the applicant's history, including rental, debt and criminal histories. HUD requires that public housing authorities deny admission to families the following histories: eviction from federally assisted housing for drug related criminal activity for three years following the date of eviction; currently engaging in illegal use of a drug; subject to a lifetime registration requirement under a State sex offender registration program; conviction of drug-related criminal activity for manufacture of methamphetamine on the premises of federally assisted housing; or alcohol abuse which would interfere with the health, safety or right to peaceful enjoyment of the premises by other residents.⁵⁰ However, the AHA also adds several other grounds for denial to the HCV program. These grounds include failure to meet eligibility requirements, respond to written

⁴⁹ AHA. (June 29, 2000) "Section 8 Administrative Plan." p. 7

⁵⁰ https://www.hud.gov/sites/documents/DOC_10760.PDF

requests for information, or complete any aspect of the lease-up; currently owing debt to another PHA, committing fraud or bribery in relation to federally assisted housing, threatening behavior toward AHA staff, termination of any family member's voucher within the last 3 years, or failure to meet the obligations of the welfare-to-work (WTW) program if receiving a WTW voucher. The AHA will provide written notification to the applicant family if they are denied a voucher.

Families that are selected from the waiting list must attend a mandatory briefing to learn about the housing choice voucher program. Those families that miss two scheduled briefings without good cause are denied admission to the program. The AHA provides reasonable accommodations for disabled applicants to attend the program briefing in a manner and location that is appropriate for the applicant. Once all eligibility information has been verified and the family has attended a briefing, the family is issued a housing choice voucher based on their determined subsidy. The AHA subsidy standards allow a minimum of one person per bedroom, and a maximum of 2 persons per bedroom for any unit. Efficiency units are allowed a maximum of one tenant. Adults related by blood are not required to share a bedroom, nor are adults and their children, foster family members or live-in aides. However, children of the same sex must share a bedroom. Exceptions to subsidy standards are permitted when a family presents a medical need that requires a larger unit than allowed.

Policies for admissions to AHA public housing and PBRA are briefly described on the housing authority's website. The AHA uses a separate waiting list for its HCV holders and its public housing and PBRA units. However, both application processes generally accept applicants on a first-come, first-served basis. One noted difference between programs appears during the tenant's acceptance of their public housing unit. The AHA's Administrative Plan notes that landlords are responsible for collecting a deposit from new voucher holders. The Admin Plan does not state that a deposit is required for the issuance of a voucher. However, the public housing admissions process listed on the website states:

"Once your name reaches the top of the list, and a unit becomes available, AHA will offer you a unit in one of our properties. You will be given three days to sign the lease and make your deposit. If you are unable to make your deposit or you decline to accept the apartment offered, you are removed from the waiting list for that specific development."⁵¹

HUD regulations for the ACOP indicate that a housing authority may only remove applicants from a waiting list if they (1) have already found housing, (2) request to be removed from the list, (3) have refused the unit without good cause, or (4) are rejected by the housing authority. Reasons for rejection from the housing authority may include ineligibility, failure to pay outstanding balances owed to the housing authority or utility companies, failure to attend orientation or meet home visit requirements, or failure to pass the criminal history screening.⁵² The AHA's requirement for a deposit prior to public housing admissions may create an unmandated burden for some applicants seeking publicly supported housing.

⁵¹ Albany Housing Authority. "Applicants." <https://www.albanyhousingauthorityga.com/applicants-1>. Accessed March 23, 2021

⁵² HUD. (June 2003) "Public Housing Occupancy Guidebook." https://www.hud.gov/sites/documents/DOC_10760.PDF, p. 41

Chapter 8. Housing for People with Disabilities

An estimated 12.7% of the U.S. population had a disability as of the American Community Survey Five-Year Estimates for 2015-2019. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development notes that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.⁵³

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. People with hearing difficulty may require modifications to auditory notifications like fire alarms and telecommunication systems, while visually impaired individuals may require tactile components in design and elimination of trip hazards. People who have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and dedicated staff. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships, as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Modifications and assisted living arrangements tend to pose significant costs for people with disabilities, who already experience more difficulty affording housing compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.⁵⁴

In the city of Albany, an estimated 11,340 residents have a disability, representing 15.8% of the total population. Seniors (age 65 or older) have the highest disability rate at 39.4%. In contrast, the rate for those age 18 to 64 is 14.7%, and just 4.9% of children under age 18 have a disability. These rates are slightly higher than those of the Albany metro area region, where 15.3% of residents have a disability, including 38.4% of seniors and 3.4% of youth.

Ambulatory disabilities are the most common type in both the city and the region, affecting 9.9% of city residents and 9.0% of the region's population. Cognitive and independent living disabilities are the next most common disabilities, impacting approximately 6% to 7% of the population in both geographies. Hearing, self-care, and vision difficulties are the three least common disability types, each affecting fewer than 4% of the city's and region's residents.

⁵³ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

⁵⁴ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

Table 18 – Disability by Type

Disability Type	City of Albany		Albany MSA	
	#	%	#	%
Hearing difficulty	1,895	2.6%	4,853	3.3%
Vision difficulty	2,553	3.6%	4,738	3.3%
Cognitive difficulty	4,536	6.8%	8,760	6.5%
Ambulatory difficulty	6,608	9.9%	12,195	9.0%
Self-care difficulty	2,254	3.4%	4,574	3.4%
Independent living difficulty	3,824	7.1%	6,924	6.4%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: 2015-2019 5-Year American Community Survey, Table S1810

Table 19 – Disability by Age Group

Age of People with Disabilities	City of Albany		Albany MSA	
	#	%	#	%
Age 5-17 with disabilities	869	4.9%	1,820	3.4%
Age 18-64 with disabilities	6,426	14.7%	11,818	13.7%
Age 65+ with disabilities	4,045	39.4%	8,566	38.4%

Note: All % represent a share of the total population within the jurisdiction or region within each age group.

Source: 2014-2018 5-Year American Community Survey, Table S1810

Accessible Housing Supply and Affordability

For multifamily housing, any new housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision/hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

A search for affordable elderly and special needs housing using HUD’s Resource Locator tool was conducted to identify affordable rental properties in Albany designed to serve people with disabilities. The search returned 10 results for properties specifically designated for elderly residents (developed under the Section 202 program), although disabled residents of any age may also be able to qualify. The properties include Arcadia Courtside (24 one-bedroom units), Arcadia Commons (28 one-bedroom units), Dalewood Estates (49 one-bedroom units), Albany Housing I, II, III (10 1-bedroom units each), Albany Housing IV (10 efficiencies), Albany Housing V (6 two-bedroom units and 1 three-bedroom unit), Albany Housing VI (8 two-bedroom units), and Albany Housing VII (7 two-bedroom units).

A similar point-in-time search on socialserve.com for affordable apartments with accessibility features currently for rent in the Albany area returned 41 results, all but eight of which had waiting lists for available units. Move-in ready accessible units were advertised at Sunchase Apartments, the Cove at Southlake Apartments, the Bridges at Southlake Apartments, Treeside Park, and four street addresses. Monthly rents for these advertised units ranged

from \$186 (in income-restricted units) to \$800. The accessibility features offered varied significantly across these units and were far from comprehensive. The most features were offered at Sunchase Apartments, which provides toilet and bath grab bars or reinforcements, 32” or wider doorways, flat or no-step entry, and front controls on stoves.

Based on a standard Supplemental Security Income (SSI) payment of \$794 per month (equating to an affordable rent of \$238 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities. As described in Chapter 7, there are 347 public housing units and 125 housing choice vouchers in the city of Albany.

The share of residents with a disability in various types of publicly subsidized housing in Albany and the region are shown below. In both the city and region, the share of residents with a disability living in public housing units (28.4%) is much greater than the share of the population with a disability (15.8% in the city and 15.3% in the region). People with disabilities comprise 16.1% of residents using Housing Choice Vouchers in the city and 15.6% in the region, shares similar to their proportions of the city and regional populations. People with disabilities are underrepresented in project-based Section 8 units, making up only 5.6% of residents in these units in the city and region. Data on the disability status of Section 202 and 811 households is not available.

Table 20. Disability by Publicly Supported Housing Program Category

Housing Type	Share of Residents with a Disability	
	City of Albany	Albany Region
Public Housing	28.4%	28.4%
Project-Based Section 8	5.6%	5.6%
Section 811 Housing	N/A	N/A
Section 202 Housing	N/A	N/A
HCV Program	16.1%	15.6%

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019; Low Income Housing Tax Credit (LIHTC) database, 2017 (AFFH data, July 2020)

The outsized shares of public housing containing people with disabilities suggests that public housing is a significant component of the area’s supply of affordable and accessible housing. The overrepresentation of people with disabilities in public housing and waiting lists for the vast majority of units in the private rental market indicate that the need for accessible housing options in Albany is not met by the current supply. Residents and stakeholders who participated in this planning process also emphasized the need for housing accessible for people with disabilities, noting that:

- There are too few accessible apartments. Landlords can’t deny people on the basis of a disability, but often refuse people on the basis of modifications or repairs required.
- Mobility is an issue. Elderly people and people with disabilities often need single floor homes, or elevators if they live in apartment buildings. People may need lifts or hoisters to get into bed.

Zoning and Accessibility

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. This includes a local government's affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy housing. It also includes the affirmative obligation not to segregate housing for protected classes into lower-opportunity, less desirable areas of the jurisdiction. Even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities accept an obligation to set and implement standards and policies that protect and advance fair housing choice for all. Conditions of Albany's zoning codes affecting accessibility are assessed in the following sections. Several elements of the following analysis refer back to the scored zoning code review presented in Chapter 6.

Definition of "Family" and Group Housing for People with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the intended or unintended (depending on the motivations behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations. Under Article 5 of the city's 2009 Zoning Ordinance, Albany defines "family" as,

"One (1) or more persons related by blood or adoption and two (2) additional persons who are unrelated occupying a housing unit and using common kitchen facilities and entrances, as distinguished from a group occupying a boarding housing, lodging house, hotel, fraternity house, sorority house or personal care home."

Although the definition requires that the individuals live as functionally equivalent to that of a family related by blood, marriage, adoption, or legal guardianship as a single housekeeping unit, more progressive definitions of family would not then limit the number of unrelated household members just as the zoning code does not limit the number of related household members who function as a single housekeeping unit. Rather, under more permissive land use codes, maximum occupancy per dwelling can be regulated by the jurisdiction's building code's housing occupancy standards as a matter of safety rather than the zoning regulations. Limiting a family to no more than two unrelated individuals is neither the most permissive nor most restrictive under case precedent, but it does fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood, marriage, adoption or legal guardianship and may violate fair housing, privacy, and due process protections if challenged.

The definition of family also restricts households of unrelated individuals who also meet the definition of a "community residence," especially those community residences serving persons with disabilities, from being located closer than 1000' to the nearest property line of another community residence, but does not place the same restriction on other types of single family housing for non-handicapped persons. In this way, the definition is not facially neutral towards all groups of unrelated persons. However, because there is no limit on the number of persons related by blood / marriage / adoption / guardianship that may reside together, but there is a limit on the number of unrelated persons who may reside together, and a further restriction on unrelated persons in a group residence for persons with disabilities, application of the family definition may have the effect of disproportionately impacting protected groups, such as limiting housing choice for unrelated adults with disabilities seeking to live together in a family-like, integrated household.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations' impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or "to afford persons with a disability the equal opportunity to use and enjoy a dwelling." (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation. Albany has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation/modification to zoning, land use, and other regulatory requirements, but it is recommended that all zoning authorities do so.

Albany adopted a reasonable accommodations ordinance in 2013. The ordinance allows a person with a disability, their representative, or a developer to apply for a reasonable accommodation when a local policy has the effect of producing a barrier to fair housing. Requests for a reasonable accommodation can be determined by the city's Planning Director through an administrative process. No public hearing or advance notice is required to make a request. The Planning Commission or Historic Preservation Commission may also decide on a reasonable accommodation where other land use or external modification requests are involved. However, none of the review processes require a public hearing. An approval is guaranteed by the board if the applicant demonstrates that:

- The reasonable accommodation will serve the residences of a disabled person,
- The accommodation is necessary to make the residence livable for the disabled person,
- The accommodation will not cause undue financial burden on the city, and
- The accommodation will not fundamentally alter the city's laws and ordinances, including its zoning ordinance.

Chapter 9. Fair Housing Activities

Fair Housing Resources

Georgia has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the “FHAA”), known as the Georgia Fair Housing Act (O.C.G.A. § 8-3-200 et seq.). Both the federal and state laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. These laws also protect persons from retaliation for exercising fair housing rights. Although federal law sets the minimum standards for fair housing enforcement and does not preclude local and state laws from expanding protected classes and fair housing rights, Georgia’s FHA does not extend protections to any other class of persons outside of those protected by the FHA. Moreover, O.C.G.A. §8-3-220 prohibits local governments (or “political subdivision[s] of the state”) from adopting fair housing ordinances that extend protected class status to individuals who are not currently protected under the Georgia Fair Housing Act.

State fair housing laws deemed “substantially equivalent” to the federal Fair Housing Amendments Act (FHA)—with parallel provisions regarding rights, procedures, remedies, and judicial review and enforcement—may qualify for HUD-subsidized, state-level enforcement of fair housing laws through HUD’s Fair Housing Assistance Program (FHAP). Under Georgia’s Fair Housing Law, the Georgia Commission on Equal Opportunity (GCEO) has the authority and responsibility to administer and enforce fair housing rights. The GCEO ceased to participate as a FHAP agency in 2012 but has been working in partnership with HUD in recent years to regain “substantial equivalence” status.

On August 3, 2020, Governor Brian Kemp signed HB 969 amending the Georgia Fair Housing Law to clarify the role of GCEO in investigating fair housing complaints, to revise aspects of the enforcement process, and to provide for administrative proceedings to be conducted by an administrative law judge, among other amendments. This was the final requirement needed for the GCEO to become a FHAP Interim Certified agency, which was announced on September 1, 2020. As an interim certified agency, GCEO will receive funding, training, and technical assistance from HUD on a noncompetitive basis for up to three years as it builds its fair housing enforcement capacity.

The GCEO has the authority and responsibility to administer and enforce the Georgia Fair Housing Act and to investigate housing discrimination complaints that it receives under state law. The Georgia Fair Housing Act provides that in any case where HUD has initiated an investigation or an action against a person or organization for alleged discriminatory housing practices, the state may not also pursue an investigation or action against that party for the same alleged discriminatory conduct. The law also provides that wherever a local fair housing law grants rights and remedies which are substantially equivalent to the state law, the GCEO must notify the appropriate local agency of an alleged violation and take no further action if the local enforcement official commences proceedings in the matter. A local agency also may institute a civil action, without the need to first exhaust administrative remedies, if it is unable to obtain voluntary compliance with its local fair housing law.

Metro Fair Housing Services, Inc., a nonprofit fair housing advocacy organization whose service area includes the City of Albany, recently was awarded grant funding under HUD’s Fair Housing Initiatives Program (FHIP). Under the FHIP, HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

For FY 2019, HUD awarded Metro Fair Housing Services, Inc. a \$300,000 multiyear grant under the FHIP’s private enforcement initiatives (PEI) grants category. Metro Fair Housing Services has pledged to use its grant award to

continue its core fair housing activities in the greater Atlanta area; to perform rental, sale, and lending tests based on race, national origin, familial status, and disability; to collaborate with faith-based and community organizations to conduct education events; to assist aggrieved parties in filing bona fide fair housing allegations with HUD; to mediate or conciliate complaints; to recruit and train new testers; and to sponsor Fair Housing Month events in April.

Fair Housing Complaints

An individual in the City of Albany who believes he or she has been the victim of an illegal housing practice may file a complaint with the Georgia Equal Opportunity Commission or with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

For the federal administrative complaint process, after the FHEO receives a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, HUD must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO finds "reasonable cause," HUD must issue a "Charge of Discrimination." If the FHEO determines that there is no "reasonable cause," the case is dismissed. The advantages of seeking redress through the administrative complaint process are that HUD takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and also impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

However, the aggrieved party or the respondent may elect to have the administrative proceeding terminated and the case instead adjudicated in federal court. The Department of Justice will prosecute the case on behalf of the aggrieved party. Additionally, the DOJ may bring suit on behalf of individuals based on referrals from HUD in the case of a "pattern or practice" of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. An aggrieved party may intervene in any action filed by the DOJ.

The investigation, conciliation, reasonable/no reasonable cause findings, and charge procedures under the Georgia Fair Housing Act are substantially similar to the HUD process, including an administrative hearing with the availability of compensatory and injunctive relief. However, where the matter involves the legality of any state or local zoning or other land use law or ordinance, the GCEO administrator must refer the matter to the Attorney General for appropriate action instead of issuing a charge.

An aggrieved party may bypass the federal and state administrative enforcement process and file a civil action directly in federal district court or state superior court, thus maintaining control of the case and the potential to collect punitive damages. Civil litigation is available without first exhausting administrative remedies unless the parties have already entered a conciliation agreement or, following a charge of discrimination, an administrative hearing has already commenced.

The advantages of seeking redress through the administrative complaint process are that administrative proceedings are generally more expedited than the federal court trial process, and the enforcement agency takes



on the duty, time, and cost of investigating the matter and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings and potential remedies are more limited.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers.

Complaints Filed with HUD

Region IV of HUD’s Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Georgia (as well as Alabama, Florida, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee). The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

The Atlanta Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. The office responded to a request for data regarding complaints received affecting housing units in the City of Albany for the five-year period January 1, 2016 through December 31, 2020.

From January 1, 2016 to December 31, 2020, HUD reported the filing of 10 complaints alleging housing discrimination in Albany. Six of the 10 complaints were filed in 2018 and there were no 2016 complaint filings; the other years within the time period each saw no more than two complaints filed. The most commonly cited issues in these complaints were discriminatory terms, conditions, or privileges relating to rental housing (cited 7 times) and failure to make reasonable accommodation for a disability (also cited 7 times).

Of the 10 complaints filed, three remained open at the time the complaint data was reported by HUD, another three were reconciled and settled successfully. Two complaints were withdrawn by the complainant without resolution, one was closed due to the complainant’s failure to cooperate in HUD’s investigation, and one was found to have no cause. In cases resolved by settlement/conciliation, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation. Monetary damages were awarded in all three of the successfully settled complaints. Other relief may also have been provided to complainants as part of the settlements, often including such measures as policy revisions, training, housing and other affirmative relief.

Table 21. Complaints Filed with HUD, 2016-2020

Albany Complaint Filings: 2016-2020					
Filing Date	Closure Date	Basis / Bases	Issue(s) Alleged	Disposition	Settlement Amount (if applicable)
09/15/17	02/21/18	Familial Status	<ul style="list-style-type: none"> Discriminatory refusal to rent Discriminatory advertising/ statements 	No cause determination	N/A
05/24/18	12/06/18	Disability	<ul style="list-style-type: none"> Discrimination in terms/ conditions/ privileges relating to rental Failure to make reasonable accommodation 	Withdrawn by complainant without resolution	N/A
05/24/18	12/06/18	Disability	<ul style="list-style-type: none"> Discrimination in terms/ conditions/ privileges relating to rental Failure to make reasonable accommodation 	Withdrawn by complainant without resolution	N/A



06/05/18	07/11/18	Disability	<ul style="list-style-type: none"> • Discrimination in terms/ conditions/ privileges relating to rental • Failure to make reasonable accommodation 	Conciliation/ settlement successful	\$1,700
06/05/18	07/27/18	Disability	<ul style="list-style-type: none"> • Discrimination in terms/ conditions/ privileges relating to rental • Failure to make reasonable accommodation 	Conciliation/ settlement successful	\$1,100
09/07/18	12/06/18	Familial Status, Retaliation	<ul style="list-style-type: none"> • Discriminatory advertising/ statements • Discrimination in terms/ conditions/ privileges relating to rental • Otherwise deny or make unavailable • Discriminatory acts under Section 818 (coercion, etc.) 	Complainant failed to cooperate	\$0
09/25/18	02/04/19	Sex	<ul style="list-style-type: none"> • Discriminatory terms, conditions, privileges, or services and facilities • Otherwise deny or make unavailable • Discriminatory acts under Section 818 (coercion, etc.) 	Conciliation/ settlement successful	\$3,772
04/03/19	Open	Disability	<ul style="list-style-type: none"> • Discriminatory terms, conditions, privileges, or services and facilities • Discrimination in terms/ conditions/ privileges relating to rental • Discrimination in services and facilities relating to rental • Otherwise deny or make unavailable • Failure to make reasonable accommodation 	N/A	N/A
10/06/20	Open	Race, Disability	<ul style="list-style-type: none"> • Discriminatory terms, conditions, privileges, or services and facilities • Discrimination in terms/ conditions/ privileges relating to rental • Failure to make reasonable accommodation 	N/A	N/A
12/31/20	Open	Disability	<ul style="list-style-type: none"> • Discriminatory terms, conditions, privileges, or services and facilities • Failure to make reasonable accommodation 	N/A	N/A

Source: HUD Region IV Office of Fair Housing and Equal Opportunity

The data for reported cases also lists the basis for discrimination, of which the complainant may cite more than one basis of discrimination in a single complaint. Due to multiple bases named in some complaints, the 10 filed complaints from Albany named a total of 12 bases for discrimination. Disability was the most common basis of discrimination, found in 70% of complaints. Two complaints were filed on the basis of familial status; race, retaliation, and sex were each named once as a basis for complaint during the five-year period.

Table 22. Complaints by Basis in Albany

Complaints by Basis						
Basis	2016	2017	2018	2019	2020	Total
Disability	0	0	4	1	2	7
Familial Status	0	1	1	0	0	2
Race	0	0	0	0	1	1
Retaliation	0	0	1	0	0	1
Sex	0	0	1	0	0	1
Total	0	1	7	1	3	12

Source: HUD Region IV Office of Fair Housing and Equal Opportunity

Complaints Filed with GCEO

The Georgia Commission on Equal Opportunity (GCEO), under the auspices of the Office of the Governor, has a Board of Commissioners made up of attorneys and community leaders from across the state. The GCEO has two divisions: the Equal Employment Division and the Fair Housing Division. The mission of the Fair Housing Division is to promote broader housing choices in Georgia; to promote understanding of the Georgia Fair Housing Act and the federal FHA; to encourage integrated communities/neighborhoods; to secure compliance with state and federal fair housing laws; to eliminate discrimination; and to punish persons who violate fair housing laws.

The GCEO, which maintains complaint data only by county, reported that for the period January 1, 2016 through December 31, 2020, it received or processed just one complaint regarding housing units within Dougherty County. The complaint, alleging the application of different terms or conditions in the rental or sale of housing based on the complainant’s disability status, was successfully conciliated and closed.

Table 23. Complaints Filed with GCEO, 2016-2020

Dougherty County Complaint Filings: 2016-2020				
Filing Date	Status	Basis	Issue Alleged	Disposition
3/13/2019	Closed	Disability	Different Terms Conditions Privileges or Services/Facilities	Successful Conciliation

Source: Georgia Commission on Equal Opportunity

Complaints Filed with Metro Fair Housing

Metro Fair Housing Services, Inc., headquartered in Atlanta, uses the FHIP funding it receives to conduct education and outreach, complaint intake and processing, and fair housing testing. Through the most recent multiyear FHIP funding grant, Metro Fair Housing may receive and investigate complaints of alleged housing discrimination, conduct mediation and conciliation efforts; and refer meritorious claims to HUD. While the organization’s work is primarily focused in the metro Atlanta region, it does serve areas of Georgia, including Albany, that are not served by another FHIP-funded entity.

For the period January 1, 2016 through December 31, 2020, Metro Fair Housing Services reported that it had received no fair housing complaints originating from the City of Albany.

Fair Housing Lawsuits and Litigation

Research revealed one noteworthy HUD Office of Hearings and Appeals administrative case involving housing in Albany but no significant federal or state lawsuits during the recent 5-year period between January 2016 and January 2021 specifically involving housing choice in Albany. An update concerning the post-*Olmstead* settlement agreement between the DOJ and the state in *U.S. v. Georgia*, Civil Action No. 1:10-cv-249 (N.D. Ga. 2010), requiring the state to expand community alternatives to institutionalization for persons with mental or developmental disabilities, also is discussed.

- United States Department of Housing & Urban Development v. Tzadik Georgia Portfolio, LLC, OHA No. 20-AF-0221-FH-010; FHEO No. 04-19-6405-8 (HUD Office of Hearings and Appeals) (Consent Order, Nov. 2, 2020).

On July 3, 2020, HUD filed a Charge of Discrimination (“Charge”) alleging Tzadik Georgia Portfolio, LLC, Tzadik Management Group, LLC, Wendy Brown, and Shequoia Holloway (collectively “Respondents”)—the owners and operators of 333 South Mock Road in Albany, Georgia—denied a reasonable accommodation request, made housing unavailable, and imposed different terms and conditions based on Complainant’s disability in violation of the FHA.

In April 2018, Respondent Tzadik Georgia Portfolio, LLC purchased the Subject Property. Under previous ownership, Complainant had been permitted to pay his rent on or after the second Wednesday of every month rather than the first of each month as a reasonable accommodation for his disability, because he received disability benefits from the government on or after the second Wednesday of every month and he could not alter the date when his disability benefits were deposited in his account. Respondents denied Complainant’s request to move the monthly rental payment due date, assessed late fees against him, and ultimately sought to have him evicted. After a complaint was filed and investigated, HUD issued a Charge of Discrimination against Respondents.

To resolve the allegations, Respondents agreed to pay the Complainant \$34,900. In addition, Respondents and any of their agents or employees who receive, process, review or make determinations with regard to any reasonable accommodation request are required to bear the cost of and attend a minimum of two hours of approved training pertaining to their obligations under the FHA and applicable state and local housing non-discrimination laws. Respondents also had to adopt and implement a HUD-approved reasonable accommodation policy. The Consent Order remains in effect for two years, during which HUD maintains compliance review authority and may inspect Respondents’ property, examine witnesses, and copy pertinent records to determine ongoing compliance with the Consent Order and the FHA.

- U.S. v. Georgia, Civil Action No. 1:10-cv-249 (N.D. Ga. 2010).

Community-based, supportive housing for persons with disabilities has been profoundly impacted by the Supreme Court’s landmark decision in *Olmstead v. L.C.*, 527 U.S. 581 (1999), and the state level enforcement actions that followed. The *Olmstead* decision held that people with disabilities have a qualified right to receive state funded supports and services *in the community* rather than institutions when (1) the person's treatment professionals determine that community supports are appropriate; (2) the person does not object to living in the community; and (3) the provision of services in the community would be a reasonable accommodation when balanced with the needs of other similarly situated individuals with disabilities receiving services.

On October 19, 2010, the DOJ entered into a comprehensive Settlement Agreement with the State of Georgia, resolving the federal government’s investigation and allegations that individuals with mental illness and developmental disabilities confined in State hospitals were unnecessarily institutionalized and subjected to unconstitutional harm to their lives, health, and safety in violation of the ADA and the U.S. Constitution. The settlement agreement required Georgia to expand community services so that individuals with mental illness and developmental disabilities can live in home-like settings rather than institutions and receive support in the most integrated setting appropriate to their needs. Specifically, for individuals with developmental disabilities, the agreement provides that Georgia will cease all admissions to the State-operated institutions; create more than 1100 home and community-based



waivers (NOW and COMP) to serve individuals in the community; serve those receiving waivers in their own home or their family's home consistent with the individual's informed choice; and provide family supports, mobile crisis teams, and crisis respite homes.

The Court appointed an Independent Reviewer to assess the State's progress under the agreement. The anticipated date for substantial compliance was July 1, 2015; however, in 2016, the DOJ filed a motion requesting the Court hold Georgia in contempt for its failure to meet the settlement agreements terms, and requested that the court order the state to remedy its non-compliance, specifically regarding provisions that require support coordination, quality assurance, transition and discharge planning, and supported housing to support persons with disabilities in the community.

After renegotiation, the parties entered an Extension of Settlement Agreement to allow more time and resources for the State to transition persons with disabilities from institutional settings to community-based, residential homes; implement a system that monitors and implements support services and provides surveillance for persons in the system; increase the number of NOW and COMP waivers to keep eligible people in residential settings rather than nursing care or psychiatric facilities.

The original Settlement Agreement, filed on October 19, 2010, and the Extension Agreement, filed on May 18, 2016, both require an Independent Reviewer to file reports each year with the Court. The latest report filed September 21, 2020, focuses on the activities of the Department of Behavioral Health and Developmental Disabilities (DBHDD) during the period from July 1, 2019 until June 30, 2020, and specifically the DBHDD's response to the COVID-19 pandemic in continuing services and protecting the state's mentally and developmentally disabled population in its care.

Past Fair Housing Goals and Related Activities

The City of Albany last prepared an AI in 2016 that identified four impediments to fair housing choice in the city and recommended actions to address them. The impediments from this prior AI are shown in the table that follows, along with a statement of the progress made toward addressing them over the intervening period of time.

Table 24. Actions Taken to Address Previously-Identified Impediments

Impediment	Actions Taken Since Previous AI
1. Lack of Fair Housing Organization/ Fair Housing Education	<ul style="list-style-type: none"> • Between 2016 and 2020, a total of 624 individuals were educated on fair housing during workshops and trainings that the City cosponsored with partners including United Way of Southwest Georgia and NID Housing Counseling Agency.
2. Cost of Housing Limits Housing Choice	<ul style="list-style-type: none"> • Developers and Community Housing Development Organizations (CHDOs) were solicited to develop affordable housing within Neighborhood Revitalization Strategy Areas (NRSAs) and other areas within the City. A total of 12 housing units have been rehabilitated and sold/leased to income-eligible households. • The City promoted its lease-purchase and homeownership programs to LMI households. Four homes have been sold with mortgage financing or closing cost assistance provided to make housing affordable. • 131 housing units were rehabilitated to help maintain the existing housing stock for LMI households. • 81 low-income residents were provided TBRA assistance to maintain affordable and quality housing. • 6 housing units were acquired and rehabilitated for occupancy by LMI persons. • Financial literacy and one-on-one counseling are provided by two HUD-approved Housing Counseling Agencies within the City. Since 2018, homebuyer education workshops were held with 110 total participants. One-on-one housing counseling sessions were held with 90 LMI households.
3. High Concentrations of Low-Income Housing	<ul style="list-style-type: none"> • The City targets its CDBG and HOME Funds to low-income census tracts within the City to include NRSAs and other low-income neighborhoods. • De-concentration of LMI households is aided with issuance of Tenant Based Rental Assistance (TBRA) vouchers which enables LMI households to reside in non-LMI neighborhoods. A total of 132 households have been provided TBRA rental housing vouchers to be used within the City of Albany limits.
4. Lack of Accessible/Special Needs Housing	<ul style="list-style-type: none"> • The City has 10 handicapped-accessible rental units that are maintained and made available to seniors at Broadway Villas and 1 rental unit located at Jefferson Place. All of the units have consistently remained at 100% occupancy. • Through the City’s rental program, reasonable accommodations are made to housing units to make them more accessible by people with disabilities.

Chapter 10. Identification of Impediments

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 22, along with implementation timeframes and responsible parties.

Impediment #1: Low Labor Market Engagement and Limited Incomes Restrict Housing Choice and Access to Opportunity Among Protected Classes

Significant disparities in labor market engagement exist by geography, race, and ethnicity in Albany. Residents of northwest and west Albany tend to have the highest levels of educational attainment and labor force participation and the lowest levels of unemployment. In contrast, residents of central, east, and south Albany tend to have the lowest levels of educational attainment and labor force participation and are unemployed at the highest rates. Median household incomes are highest in northwest Albany and lowest in central, south, and east Albany, where they fall below \$20,000 in five census tracts. Among racial and ethnic groups, Black residents have the lowest rates of educational attainment (15.6% have a bachelor's degree or higher), the highest rates of unemployment (17.3% are unemployed), and the lowest median household incomes (\$26,092).⁵⁵ Low levels of labor market engagement drive down wages, thus restricting housing choice and access to opportunity. Combined, the city's low labor market engagement among protected classes and high segregation levels contribute to racially and ethnically concentrated areas of poverty.

Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. Examples of place-based strategies to increase labor market engagement include increasing awareness of high-growth jobs that pay family-sustaining wages and connections to the training necessary to obtain them, and targeting neighborhoods with high proportions of low-earning workers as priorities for interventions that increase awareness of available subsidies and resources.⁵⁶

Planning efforts underway in the city and region identify gaps and provide recommendations for increasing labor market engagement and earnings in Albany and Dougherty County. In particular, the Albany Dougherty Comprehensive Workforce Development Strategy (2020) notes opportunities to increase labor market engagement by focusing on goals of community connection and coordination, development of a youth pipeline, and continued adult preparation. The plan details a range of strategies to support labor market engagement in these areas, including developing a virtual and physical one-stop community resource center, providing additional opportunities for youth jobs and first jobs to support students in developing employability skills, and studying the needs of the existing adult workforce in the community to inform additional resource and programs, among

⁵⁵ Data from American Community Survey Five-Year Estimates, 2015-2019

⁵⁶ Nelson, M., Wolf-Powers, L., & Fisch, J. (2015). *Persistent low wages in New Orleans' economic resurgence: policies for improving earnings for the working poor*. In The Data Center. (2015). New Orleans Index at 10.

others. Efforts to address workforce development needs are vital to improving labor market engagement among protected classes in Albany and thus to increasing housing choice and economic mobility in the city.

Impediment #2: Continued Need for Neighborhood Investment in Central, East, and South Albany

Low levels of access to resources and services in areas with higher levels of poverty--combined with high levels of segregation by race, ethnicity, and income--also create barriers to access to opportunity in Albany. The need for neighborhood investment is particularly acute in central, east, and south Albany, areas of the city with the highest poverty rates. Disparities by geography, race, and ethnicity exist with regard to access to community centers and programming; fresh food retailers; high-performing schools; and healthcare. Areas of the city with higher proportions of white residents tend to have greater access to opportunities relative to those with higher proportions of Black residents and residents living below the poverty level. Data from the American Community Survey and other sources, maps, and community input from meetings and stakeholder interviews indicate that residents of central, east, and south Albany tend to have lower levels of access to high-quality neighborhood facilities, resources, and services:

- Residents and stakeholders who participated in this planning process noted a need to improve the city's recreation and community services facilities in these areas of the city, as well as the need to develop new amenities and programming, including a one-stop recreation and sports facility open 24 hours per day and additional recreation-focused programming for youth.
- The proportion of residents who have low incomes and live further than ½ mile from a supermarket tends to be highest in census tracts in central, east, and south Albany. In six census tracts in these areas, more than 70% of residents have low incomes and live more than ½ mile from a supermarket. Most large food retailers, including Publix, Target, and Walmart Neighborhood Market, are in northwest and west Albany, while smaller food retailers, convenience stores, and dollar stores serve most of the rest of the city.
- Elementary and middle schools with the highest percentages of students scoring at the Beginning Learners level tend to be located in and around south and east Albany, while schools with the lowest percentages of students scoring at that level tend to be in northwest and west Albany. To ensure students have access to the resources they need, residents and stakeholders who participated in this planning process emphasized a need for youth centers and youth development programming, including education, job readiness, mentoring, and recreation services.
- Residents in east and central Albany tend to be uninsured at the highest rates in the region (20.3% to 31.1% uninsured residents in six census tracts), while west Albany census tracts have the lowest percentage of insured residents (4.3% to 6.1% uninsured in three census tracts). Participants in Phoebe Putney Memorial Hospital's Community Health Needs Assessment (2020-2022) noted that the cost of health insurance and out of pocket expenses are barriers to accessing healthcare.

Together, these measures indicate that a lack of access to high-quality neighborhood facilities, resources, and services in these areas of the city restrict access to fair housing choice by limiting opportunity for residents living in these areas. To address disparities in neighborhood infrastructure and associated lack of access to opportunity, meeting attendees and stakeholders interviewed during this planning process emphasized the need for continued investment in neighborhood services, facilities, and infrastructure, particularly in central, east, and south Albany.

Impediment #3: Rental Housing in Poor Condition Disproportionately Affects Protected Classes

Albany's east, south, and downtown neighborhoods experience a convergence of economic challenges that impact residents' access to quality housing. Residents in these neighborhoods have some of the lowest median incomes in the city. Census tracts 8 and 114 in downtown, tracts 15 and 106.01 in south Albany and tract 2 in east Albany have median incomes less than \$20,000, indicating that these households gross less than \$10/hr. These areas have disproportionate rates of housing burden, particularly east Albany where more than half of all residents living between the Flint River and Liberty Expressway experience housing burdens. Furthermore, renter rates in south and east Albany typically exceed 65%, with renter rates downtown exceeding 80%. These neighborhoods are predominantly Black, with Black residents comprising up to 97% of the population (e.g. tract 2). At the same time, stakeholder interviews have indicated that housing quality is a major issue in these neighborhoods. Many rental units experience spiking utility costs due to poor weatherization and structural issues. Housing located in the floodplain, particularly in south Albany, has seen waves of abandonment due to high insurance and elevation costs. Finally, long public housing waiting lists add to residents' limited options for safe and sanitary housing. While the city has made significant strides to focus development in these target areas, the city should continue to invest in improving existing housing quality as well as new construction in downtown, east and south Albany.

Impediment #4: Discrimination in the Housing Market Necessitates Expanded Fair Housing Education and Enforcement

Multiple data points discussed within this report suggest the presence of a variety of discriminatory housing practices in the Albany market. HUD's investigation of housing discrimination complaints has resulted in successful settlements in several Albany cases, all related to discrimination in the terms, conditions, or privileges relating to rental housing. The Georgia Commission on Equal Opportunity investigated only one complaint originating from Albany, but it too was successfully settled and concerned differential terms, conditions, or privileges applied to housing. Likewise, HUD brought a fair housing lawsuit in 2020 against an Albany rental property owner and its property management alleging that they had imposed different rental terms and conditions based on their tenant's disability. Collectively, these cases highlight a need for an expansion of fair housing education to housing professionals as well as stepped-up fair housing enforcement to detect and resolve what are likely to be many more instances of housing discrimination than are represented in lawsuit and complaint filings.

Anecdotal reports of steering by real estate agents were made by stakeholders interviewed for this study. These cases typically involved the steering of white families away from Dougherty County. Population trends do indicate a shift in white residents from Albany and Dougherty County to Lee County. There are likely many reasons for this trend, but some stakeholders believed that prejudices and misperceptions are at least partially responsible, both among Albany residents looking to move away from the city and in the real estate professionals encouraging them to do so. Finally, an analysis of mortgage lending data found that non-white households are less likely to apply for mortgage loans than white households and less likely to have those loan applications approved. Looking across all income levels, the average mortgage denial rate in 2019 was 16.8%; Asian applicants were denied at approximately twice the average rate (33%) and Black applicants had the second highest denial rate, with one-quarter (25%) of the 363 applicants being denied a mortgage.

The City has consistently invested time and resources in a fair housing education program that has successfully reached many members of the public. Between 2016 and 2020, a total of 624 individuals received fair housing

education through workshops and trainings that the City helped sponsor. This effort is commendable and should be continued, however, an expansion of education specifically to reach housing professionals such as landlords and property managers, real estate agents, and lenders should be considered.

Impediment #5: Housing Options for People with Disabilities Are Limited

In the city of Albany, an estimated 11,340 residents have a disability, representing 15.8% of the total population. While this share is only slightly greater than that of the greater Albany region, it nonetheless represents a significant portion of Albany's residents, nearly one in six. The housing needs of people with disabilities are highly varied and dependent upon the disability type, but special accommodations are often necessary. Seven of the ten housing discrimination complaints logged by HUD included disability as a basis for the alleged discrimination.

Albany adopted a reasonable accommodations ordinance in 2013 allowing people with disabilities to apply for a reasonable accommodation through a simplified administrative process when a local policy has the effect of producing a barrier to fair housing. This progressive step minimizes the burden associated with making modifications to a dwelling to accommodate a disability, but the City could do more to support increased housing options for this population. The zoning code's definition of "family" treats nontraditional, but functionally equivalent, household relationships differently from households composed of persons related by blood, marriage, adoption or legal guardianship. Additionally, the zoning ordinance prohibits certain types of group homes for people with disabilities from being located less than 1,000 feet from the nearest property line of another group home, but does not place the same restriction on other types of single family housing for non-handicapped persons. In this way, the code is not facially neutral towards all groups of unrelated persons. Because there is no limit on the number of persons related by blood, marriage, adoption, or guardianship that may reside together, but there is a limit on the number of unrelated persons who may reside together, and a further restriction on unrelated persons in a group residence for persons with disabilities, application of the family definition may have the effect of disproportionately impacting protected groups, such as limiting housing choice for unrelated adults with disabilities seeking to live together in a family-like, integrated household.

Table 22. Fair Housing Goals and Activities

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #1: Low Labor Market Engagement and Limited Incomes Restrict Housing Choice and Access to Opportunity Among Protected Classes		
<p>Low levels of labor market engagement among adult residents</p>	<ul style="list-style-type: none"> • Continue to bring together and partner with key stakeholders with the goal of implementing strategies contained in the Albany Dougherty Comprehensive Workforce Development Strategy (Ongoing, 2021), including: <ul style="list-style-type: none"> – Development of a virtual and physical one-stop community resource center to allow for streamlined services and support efficient connections between people and resources. – Study the needs of the existing adult workforce in the community to inform additional resource and programs. – Develop materials to support additional employer training and workplace supports for employees who may face barriers to work or difficulties maintaining employment. – Create career roadmaps with realistic goals for adults. • Support resident and employer participation in available job training programs, including Albany Technical College, Albany State University, and WorkSource Georgia (Ongoing, 2021). • Develop or expand paid job training programs (Ongoing, 2021). • Collaborate with residents to understand barriers to accessing existing job training programs, and develop strategies to address these barriers (Ongoing, 2021). • Continue to engage in local hiring for City contracts (Ongoing, 2021). • Include neighborhood residents, business owners, industry representatives, and representatives from neighborhood groups in planning processes for workforce development programs (Ongoing, 2021). 	<ul style="list-style-type: none"> • City of Albany • Albany Dougherty Economic Development Commission • WorkSource Georgia • Albany Technical College • Albany State University • Employers • Nonprofit community partners
<p>Continued need to expand opportunities for youth education and workforce development</p>	<ul style="list-style-type: none"> • Continue to bring together and partner with key stakeholders with the goal of implementing strategies contained in the Albany Dougherty Comprehensive Workforce Development Strategy (Ongoing, 2021), including: <ul style="list-style-type: none"> – Convene youth and adults to gather data to inform youth pipeline development strategies. – Increase parent engagement around and awareness of student skills development and employment opportunities. – Develop additional opportunities for youth jobs and first jobs to support students in developing employability skills. – Increase opportunities for co-ops, internships, and apprenticeships to support student awareness of employment opportunities available in the community and increase the number of students who stay in the city. – Integrate the K-12 system and higher education institutions through exposure activities. – Align educational programs through increased communication between institutions. • Continue efforts to integrate K-12 systems, higher education institutions, and major employers to ensure educational programs meet employer needs for high-demand jobs that pay living wages and identify gaps in current programming (Ongoing, 2021). • Fund youth-focused programming, including education, mentoring, and job training (Ongoing, 2021) 	<ul style="list-style-type: none"> • City of Albany • Albany Dougherty Economic Development Commission • WorkSource Georgia • Albany Technical College • Albany State University • K-12 system • Employers • Nonprofit community partners

Table 22. Fair Housing Goals and Activities (continued)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #2: Continued Need for Neighborhood Investment in Central, East, and South Albany		
Continued need for neighborhood reinvestment in central, east, and south Albany	<ul style="list-style-type: none"> Using CDBG or other funding, fund projects that develop, expand, or improve community centers and programming, healthcare facilities and services, and other public facilities, infrastructure, and services in low- and moderate-income census tracts, including in central, east, and south Albany (Ongoing, 2021). 	<ul style="list-style-type: none"> City of Albany Nonprofit community partners
Lack of access to fresh food retailers in central, east, and south Albany	<ul style="list-style-type: none"> Using CDBG or other funding, fund projects that increase access to fresh food in low- and moderate-income census tracts, including in central, east, and south Albany (Ongoing, 2021) 	<ul style="list-style-type: none"> City of Albany Nonprofit community partners Fresh food retailers
Geographic disparities exist regarding school performance, and disparities in academic achievement exist among protected classes.	<ul style="list-style-type: none"> Partner with local nonprofit organizations or other partners to provide resources and services to students in lower-performing schools, particularly in central, east, and south Albany. Resources and services may include basic school resources and supplies, school readiness, mentoring and tutoring, family engagement and literacy, health services, behavioral and social supports, enrichment programs, food access, support for ESL students and students with disabilities, resources for students experiencing homelessness, and other resources and services (Ongoing, 2021). 	<ul style="list-style-type: none"> City of Albany Nonprofit community partners and other partners
Need to further engage low- and moderate-income communities in planning decisions.	<ul style="list-style-type: none"> Expand community engagement efforts focused on community needs and priorities in low- and moderate-income census tracts, including working with residents and community groups to shape the City's approach to community engagement. Implement targeted outreach to engage with residents to identify areas for investment (Ongoing, 2021). 	<ul style="list-style-type: none"> City of Albany
Impediment #3: Rental Housing in Poor Condition Disproportionately Affects Protected Classes		
Conditions of older rental properties should be monitored regularly.	<ul style="list-style-type: none"> Develop a minimum standards ordinance for residential properties (2022) Create a registry of single-family rental properties that require rehabilitation. Identify ways to engage local landlords on minimum habitability standards prior to renting. (Ongoing, beginning 2022) Research and establish additional funding streams to assist qualifying landlords with the rehabilitation and repair of rental properties. (2022) 	<ul style="list-style-type: none"> City of Albany
Develop the capacity of local organizations to assist with rehab/repair programs.	<ul style="list-style-type: none"> Continue to fund housing rehabilitation activities to preserve the condition and affordability of housing in the City. (Ongoing, beginning 2022) Contract with national housing organizations to build the capacity of local non-profit organizations that can participate in rehab/repair programs. (2022) 	<ul style="list-style-type: none"> City of Albany CHDOs and housing developers

Table 22. Fair Housing Goals and Activities (continued)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #4: Discrimination in the Housing Market Necessitates Expanded Fair Housing Education and Enforcement		
Fair housing education for renters and members of the general public is an ongoing need.	<ul style="list-style-type: none"> Continue to allocate funding for fair housing education and seek opportunities to sponsor fair housing workshops and trainings (Ongoing, beginning 2021) 	<ul style="list-style-type: none"> City of Albany Housing counseling agencies Nonprofit community partners
Public input and data on housing discrimination complaint filings indicate that more fair housing enforcement is needed along with expanded fair housing education targeted to housing professionals.	<ul style="list-style-type: none"> Through a contracted fair housing organization, provide education and outreach to landlords, property owners, property managers, real estate professionals, and lenders. (2022) Work with the fair housing organization annually to develop and deliver a fair housing education program that uses innovative ways to reach housing industry professionals on a variety of fair housing topics. (Annually, beginning 2022) City leadership should consider reactivating and revitalizing the role of Albany’s Fair Housing Commission, entrusting it with a more visible role in conducting investigations and enforcing the City’s fair housing ordinance. (2022) Consider requiring housing-related businesses and housing industry professionals found to be in violation of city codes, business licensing, or other local regulations to attend a fair housing training session as part of the requirements to cure the code or regulatory violation. (2023) 	<ul style="list-style-type: none"> City of Albany Housing counseling agencies Nonprofit community partners
Stakeholder input indicated that prejudiced attitudes by some community members impacts housing choice	<ul style="list-style-type: none"> Develop and deliver community education around the concept of affordable housing and its cultural and economic value to the community. (2023) <ul style="list-style-type: none"> Develop an adaptable slide deck and presentation on the subject of the value of affordable housing, including qualitative and quantitative arguments. Establish a small “speakers bureau” of designated city staff or other community partners to deliver the presentation to local groups. Market the presentation and available speakers to community groups such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. Consider conducting a tour of successful affordable housing properties in Albany for local leaders and other interested parties to build public support for additional affordable housing development. (2022) A broad-based and trusted local convening institution (e.g. United Way or Albany State University) should be enlisted to create and offer a periodic diversity, equity, and inclusion training aimed at local community leaders and other interested parties. (2024) Explore options for communitywide events or programming that celebrate Albany’s diversity and encourage interaction among diverse participants in neighborhoods throughout the city. (2022) 	<ul style="list-style-type: none"> City of Albany Nonprofit community partners Albany State University

Table 22. Fair Housing Goals and Activities (continued)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #5: Housing Options for People with Disabilities Are Limited		
<p>Litigation history and complaint filings suggest housing providers need greater education and accountability around modification of dwellings and other accommodations for people with disabilities</p>	<ul style="list-style-type: none"> • Through a contracted fair housing organization, provide education and outreach to landlords, property owners, property managers, real estate professionals, and lenders. (2022) • Work with the fair housing organization annually to develop and deliver a fair housing education program that uses innovative ways to reach housing industry professionals on a variety of fair housing topics. (Annually, beginning 2022) • City leadership should consider reactivating and revitalizing the role of Albany’s Fair Housing Commission, entrusting it with a more visible role in conducting investigations and enforcing the City’s fair housing ordinance. (2022) • Consider requiring housing-related businesses and housing industry professionals found to be in violation of city codes, business licensing, or other local regulations to attend a fair housing training session as part of the requirements to cure the code or regulatory violation. (2023) 	<ul style="list-style-type: none"> • City of Albany • Housing counseling agencies • Nonprofit community partners
<p>Zoning code provisions raise questions about allowable siting and occupancy for housing for people with disabilities</p>	<ul style="list-style-type: none"> • The zoning code’s Family definition should be reviewed to consider the elimination of relationship by “blood, marriage, adoption, or guardianship” as a basis determining whether a household qualifies as a family, potentially opting instead to regulate maximum occupancy per dwelling through the building code’s housing occupancy standards. <ul style="list-style-type: none"> – Review the City zoning code with planning staff members and consult with community partners as needed to draft potential revisions. (2022) – Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (2023) • The permitted siting of group homes should be aligned with that of otherwise equivalent single-family housing, to include potential elimination of the 1,000 ft. spacing requirement. <ul style="list-style-type: none"> – Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (2022) – Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (2023) 	<ul style="list-style-type: none"> • City of Albany • Advocacy organizations
<p>Low-income households, including the elderly and people with disabilities, have difficulty making needed home repairs</p>	<ul style="list-style-type: none"> • Continue to fund housing rehabilitation activities to preserve the condition and affordability of housing in the City. (Ongoing, beginning 2021) • Work with the nonprofit community to support programs that assist people with disabilities with the cost of accessibility modifications to their homes. (2022) 	<ul style="list-style-type: none"> • City of Albany • Nonprofit community partners