

Table of Contents

Executive Summary	2
Section 1: Introduction	4
Methodology	5
Definitions	6
Limitations	7
Section 2: Jurisdictional Background	8
Historical Overview	8
Demographic Overview	8
Economic Indicators	11
Overview of Housing Supply	17
Section 3: Fair Housing Legal Status	22
Fair Housing Complaint Data	22
Section 4: Identification of Impediments	23
<i>Public Sector</i>	
Zoning and Land Use	23
Building Requirements	28
Local Ordinances	28
Comprehensive Planning	29
Urban Redevelopment	30
Employment-Housing-Transportation Linkage	30
Public Housing Authorities – Tenant/Voucher Selection Process	33
Property Tax Policies	35
<i>Private Sector</i>	
Analysis of Home Mortgage Disclosure Data (HMDA)	35
Lending Activity	36
Lending by Race	37
Reasons for Denial	38
<i>Public and Private Sector</i>	
Affordable Housing Supply	41
Fair Housing Enforcement	42
Informational Programs	45
Section 5: Assessment of Current Programs	46
Section 6: Recommendations and Conclusions	48

Executive Summary

Each year, the U.S. Department of Housing and Urban Development [HUD] requires Community Development Block Grant [CDBG] entitlement grantees, such as the Macon-Bibb County Consolidated Government, to submit a certification that they will affirmatively further Fair Housing. Jurisdictions must also certify that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1964 and the Fair Housing Act of 1968.

To certify their compliance with Fair Housing Laws, local entitlement communities develop an “Analysis of Impediments to Fair Housing Choice Plan” (abbreviated “AI”) to help develop and implement strategies to overcome these barriers based on their history, circumstances, and experiences. Macon-Bibb County will define the problems, develop the solutions, and be held accountable for meeting the standards set for itself. This Analysis of Impediments identifies the impediments to Fair Housing choice in the jurisdiction, assesses current Fair Housing initiatives, and describes actions Macon-Bibb County will take to overcome the identified impediments. Taking actions to address these impediments will affirm that Macon-Bibb County is taking progressive action to further Fair Housing choice in its jurisdiction.

Demographics Overview

The American Community Survey (ACS) for 2009-2013 has estimated a population of 155,611 for Macon-Bibb County. Of that estimate, nearly 71% are over the age of 19 years old. Racially, Macon-Bibb County’s population is 43.4% white, 47.3% African-American, 0.2% American Indian, 1.1% Asian and 1.3% other races. Racial migration over the past three Censuses shows an outward migration of white residents to the farthest portions of the county and an inward migration of African American residents near the location of former city boundaries.

Economic Overview

Macon-Bibb County’s median household income has dropped to its lowest point in nearly a decade at \$49,800 for 2014. According to the 2011-2013 ACS (3-year estimate), roughly 23% of all families and 27% of Macon-Bibb County residents fell below the poverty line. Of all children under the age of 18, 40.2% lived in poverty while 11.7% of all Macon-Bibb residents aged 65 or older had income below the poverty level. This can, at least partially, be attributed to high unemployment, which has been slower to recover than that of the state.

Housing Overview

Of the 69,793 total housing units in Macon-Bibb County, approximately 57,108 (81.8%) are occupied housing units, with 56% of those owner-occupied, and 44.5% renter-occupied. Estimates show that the majority of Macon-Bibb’s housing stock, 80%, was built prior to 1979, making most of the housing units 30 years or older. In examining the latest Comprehensive Housing Affordability Strategy (CHAS) data, it was discovered that by HUD’s definition, 42.1 % of renters were cost burdened and 28% were severely cost burdened.

Fair Housing Complaints

According to the United States Department of Housing and Urban Development (HUD), during the three years following the most recent AI in 2010, five formal Fair Housing complaints were filed with Macon-Bibb County. Four complaints were submitted alleging racial discrimination, while one complaint alleged discrimination based on disability. The number of complaints per year have fallen from two complaints filed in 2011 and 2012, to only a single complaint in 2013.

Current Impediments

Through the analysis and in consultation with stakeholders, the Middle Georgia Regional Commission has developed the following list of impediments to Fair Housing in Macon-Bibb County. It must be noted that some of the same impediments have been identified in previous studies, therefore further action should be taken to ensure that they do not perpetuate discrimination currently or in the future. Though the list of impediments shown below are not exhaustive, they represent the most visible challenges to Macon-Bibb County.

Zoning and Land Use:

- ***Impediment 1: Zoning Restrictions***

As noted in previous analyses of impediments, the clustering of restricted residential zones due to lot requirements and conditional permitting can create areas only affordable to upper-income households, thereby limiting housing choices. There is also discrepancy in the language used between the Macon-Bibb County Land Development Resolution and the Code of Ordinances. Finally, the definition of “family” is only referenced by the County’s Ordinances. The definition of tenant only applies to farm labor.

Recommendation #1a: It is recommended that Macon-Bibb County continue to review and clarify the language between both documents to ensure consistency between both documents. A broader definition of “family” and “tenant” is recommended to alleviate discrimination against certain groups of residents.

Recommendation #1b: Zoning and building requirements should be periodically reviewed to ensure that growth plans for Macon-Bibb County are consistent and fair with respect to diversity of communities and equal opportunity for all residents.

Infrastructure:

- ***Impediment 2: While currently serving the areas of greatest need, concentrated and restricted public transportation routes limit mobility outside of the former city limits. This reduces opportunities for protected populations, thereby limiting housing choices.***

Recommendation #2a: It is recommended that Macon-Bibb County explore opportunities and utilize resources to increase routes to rural parts of the county. MBC should review and update its Long Range Transportation Plan to reflect the needs for additional routes and make attempts to allocate or solicit funding to diversify its transportation offerings.

- ***Impediment 3: Housing demand exceeds available supply and resources to locate residents into affordable options.***

Recommendation #3a: Macon-Bibb Economic and Community Development Department (ECDD) should continue to work with both public and private housing partners to fund both rehabilitation projects and new low-cost developments to create an adequate Fair Housing supply. Concurrently, ECDD

should seek to maximize economic opportunities to provide residents with quality of life and furthering of their housing options.

Enforcement

- ***Impediment 4: Fair Housing Education and Enforcement***

There is no designated entity or process utilized consistently to receive, investigate, and refer Fair Housing complaints, as there is currently no standard recordkeeping procedure. Additionally, it was identified that though educational opportunities were available, they were described as “underutilized” by residents.

Recommendation #4a: Designate one agency to collect and refer Fair Housing information and complaints. Develop a process for which all participating agencies can submit this information to ensure accurate data is collected regarding Fair Housing.

Recommendation #4b: Macon-Bibb County should continue to utilize and expand Fair Housing education and awareness campaigns to the public. Additionally, Fair Housing education for potential landlords and developers should be implemented into business licensing requirements to insure that all parties are being informed of Fair Housing laws before they do business in Macon-Bibb County.

A summary of the 2014 Analysis of Impediments to Fair Housing will be presented to the Mayor, Commission, and the general public in conjunction with the Consolidated Plan. The Consolidated Plan states that the Macon-Bibb Economic and Community Development Department (ECDD) will hold at least one public hearing before submitting the consolidated plan or action plan to the United States Department of Housing and Urban Development (HUD). The Consolidated Government shall advertise the public hearing approximately 10 days before the day of the hearing in easily readable type in local newspapers. Macon-Bibb shall provide a 30-day comment period on the proposed consolidated plan, action plan and program amendments and a 15-day public comment period on performance reports submitted to HUD.

SECTION I: INTRODUCTION

Each year, the U.S. Department of Housing and Urban Development [HUD] requires Community Development Block Grant [CDBG] entitlement grantees, such as the Macon-Bibb County Consolidated Government, to submit a certification that they will affirmatively further Fair Housing. Jurisdictions must also certify that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1964 and the Fair Housing Act of 1968. HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote Fair Housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act.

The *Fair Housing Act* (Title VIII of the Civil Rights Act of 1968) introduced meaningful federal enforcement mechanisms. It outlawed:

- Refusal to sell or rent a dwelling to any person because of race, color, religion, sex, or national origin.

- Discrimination based on race, color, religion or national origin in the terms, conditions or privilege of the sale or rental of a dwelling.
- Advertising the sale or rental of a dwelling indicating preference of discrimination based on race, color, religion or national origin.
- Coercing, threatening, intimidating, or interfering with a person's enjoyment or exercise of housing rights based on discriminatory reasons or retaliating against a person or organization that aids or encourages the exercise or enjoyment of Fair Housing rights.

The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its application to prohibit discrimination on the basis of familial status and disability. The Act also requires the Secretary of HUD to administer the Department's Housing and Community Development Programs in a manner that affirmatively furthers Fair Housing.

An *Analysis of Impediments (AI)* is a review of impediments or barriers that affect the rights of Fair Housing choice. It covers public and private policies, practices, and procedures affecting housing choice. Impediments to Fair Housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin. The AI serves as the basis for Fair Housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and Fair Housing advocates, and assists in building public support for Fair Housing efforts. Conducting an analysis of impediments is a required component of certification and involves the following:

- An extensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws affect the location, availability, and accessibility of housing;
- An evaluation of conditions, both public and private, affecting Fair Housing choice for all protected classes; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

Local entitlement communities meet this obligation by performing an "Analysis of Impediments to Fair Housing Choice" (abbreviated "AI") within their communities and by developing and implementing strategies and actions to overcome these barriers based on their history, circumstances, and experiences. Macon-Bibb County will define the problems, develop the solutions, and be held accountable for meeting the standards set for itself. This Analysis of Impediments identifies the impediments to Fair Housing choice in the jurisdiction, assesses current Fair Housing initiatives, and describes actions the jurisdiction will take to overcome the identified impediments. Taking actions to address these impediments will affirm that Macon-Bibb County is taking progressive action to further Fair Housing choice in its jurisdiction.

Methodology

The Analysis of Impediments conducted by the Middle Georgia Regional Commission on behalf of Macon-Bibb County seeks to combine current demographic trends, housing trends, and various public and private sector influences to identify any impediments present that may lend itself to housing discrimination within the city. Various sources of data were examined, including the 2009-2013 American Community Survey, 2013 Home Mortgage Disclosure Act (HMDA) data, Loan Application Register (LAR) data, and 2014 Fair Market Rents,

Income Limits, Macon-Bibb Zoning Ordinance and Land Resolution, and Fair Housing complaints filed with HUD. In addition to data collection, a variety of analysis techniques were also utilized. These include:

- Analyzing demographic data available through the American Community Survey, as well as descriptive data pertaining to the Macon-Bibb housing market and trends in real estate over the past ten years.
- Examination of mortgage lending trends through the analysis of data available through the Home Mortgage Disclosure Act (HMDA).
- A review of source documents, including the most recent AI, conducted in 2010 by the Middle Georgia Regional Commission and the most current 2011-2016 Consolidated Plan for Macon-Bibb County.
- An examination of Fair Housing Policies and strategies from other urban communities to provide a basis of comparison between what Macon-Bibb County currently does and further steps it can and should take to affirmatively further Fair Housing.

The Analysis of Impediments is a review of all impediments to Fair Housing choice in both the public and private sector. The report includes:

- A comprehensive review of Macon-Bibb County's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing;
- An assessment of conditions, both public and private, affecting Fair Housing choice for all protected classes; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes

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

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

Definitions

One component of performing the Analysis of Impediments will require looking at definitions of certain fair housing terminology used in Macon-Bibb County's planning and policy documents. The following definitions were taken from the Department of Housing and Urban Development and serve as foundational terms to evaluate Fair Housing in Macon-Bibb County:

Affordable housing: In general, housing for which the occupant(s) is/are paying no more than 30% of his or her income for gross housing costs, including utilities. Please note that some jurisdictions may define affordable

housing based on other, locally determined criteria, and that this definition is intended solely as an approximate guideline or general rule of thumb.

Family: All persons living in the same household who are related by birth, marriage or adoption.

Dwelling: Any building, structure or portion thereof which is occupied as, or designed or intended for occupancy as, a residence by one or more families, and any vacant land which is offered for sale or lease for the construction or location thereon of any such building, structure or portion thereof.

Low income family: Families whose [combined] income does not exceed 80% of the median family income for the area.

Moderate income: Households whose incomes are between 81% and 95% of the median income for the area, as determined by HUD, with adjustments for smaller or larger families. HUD may establish income ceilings higher or lower than 95% of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs, fair market rents, or unusually high or low family incomes

Multifamily housing: A building with more than four residential rental units.

Public housing agency: Any state, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the U.S. Housing Act of 1937.

Single family property: A single-unit family residence, detached or attached to other housing structures.

Tenure: A housing unit is owner occupied (including a cooperative or condominium unit) if someone whose name is on the deed, mortgage, or contract to purchase lives in the unit. All other occupied housing units are classified as renter occupied units, including units rented for cash, if occupants or others pay some rent.

Very low income: Households whose incomes do not exceed 50% of the median area income for the area, as determined by HUD, with adjustments for smaller and larger families and for areas with unusually high or low incomes or where needed because of facility, college, or other training facility; prevailing levels of construction costs; or fair market rents.

Limitations

It is important to note the definition of Fair Housing. No federal law directs local governments to create a specific number of affordable homes. In fact, under both federal and state Fair Housing laws, landlords can reject tenants based on ability to pay or bad credit histories. Thus, federal laws do not provide assurances of affordability or availability for low-income residents. However, when local governments accept Community Development Block Grants and other federal funds, they take on an and facilitate services to low income and minority residents

The following information, herein defined as the Analysis of Impediments to Fair Housing Choice for Macon-Bibb County, was prepared for the purposes as previously described. The report seeks to identify impediments and make recommendations for potential action. Many of the impediments identified in this report will require additional research and on-going analysis by the Macon-Bibb Economic and Community Development Department. This report does not constitute a comprehensive planning guide; it simply provides analysis as to the current climate of Fair Housing in Macon-Bibb County and provides recommendations to mitigate any existing impediments.

SECTION II: JURISDICTIONAL BACKGROUND

City and County Establishment

Bibb County, in central Georgia, was formed December 9, 1822, one year after the Creek Indians ceded the last of their land in the area. The state's fifty-fifth county was formed out of portions of Houston, Jones, Monroe, and Twiggs counties and was named for William Wyatt Bibb, a Georgia politician and the first elected governor of Alabama.

The City of Macon was formed in 1823 and served as the county seat. The City briefly became the capital of Georgia from 1864-1865. Bibb County once contained numerous incorporated small towns including, Vineville, Huguenin Heights, and Payne City. Over time, the majority of these towns were annexed by the City of Macon. Payne City, which was founded as a mill town in 1899, was the only town to remain a separate entity until 2015.

In 2012, the citizens of the City of Macon and Bibb County voted to consolidate into a single government. On January 1, 2014, the City of Macon and Bibb County consolidated into Macon-Bibb County. Macon-Bibb County is a strong mayor form of government with independently elected commissioners from nine (9) districts. The Commission is presided over by the Mayor, who is the government's spokesperson and is charged with execution and enforcement of Commission's ordinances. The Mayor is aided in administrative tasks by the County Manager, who must be nominated by the Mayor and confirmed by Commission.

Demographic Overview

Macon-Bibb County has seen a very small increase in population over the past decade. In 2010, Macon-Bibb County had a total population of 155,547. The American Community Survey (ACS) for 2009-2013 has estimated a population of 155,524. Compared to more recent population estimates of surrounding counties, Macon-Bibb has stagnated in population growth. Neighboring counties Monroe, Jones and Houston saw tremendous amounts of growth of close to 20% in the same time span. A highlight of the ACS demographic information for Macon-Bibb County can be found below.

Figure 1: Macon-Bibb Demographic Profile Highlights

Macon-Bibb Demographic Profile Highlights		
Total Population	155,524	100%
Male	73,409	47.2%
Female	82,115	52.8%
One Race	152,959	98.4%
White	67,677	43.5%
Black or African American	81,150	52.2%

American Indian or Alaskan Native	327	0.2%
Asian	2,512	1.6%
Native Hawaiian or Pacific Islander	29	0.2%
Other Race	1,264	0.8%
Two or More Races	2,565	1.64%

Source: 2009-2013 American Community Survey

Age

As stated previously, the ACS for 2009-2013 estimated the county to have a population of 155,524. Of that estimate, nearly 71% (110,168) are over the age of 19 years old. Seniors over the age of 65 comprise approximately 12.9 % (n=20,108) of the population. Children under the age of 5 account for 7.3% of Macon-Bibb's population or 11,445. The median age of a resident in Macon-Bibb County is 35.4 years. A detailed chart of the population age can be seen below in Figure 2.

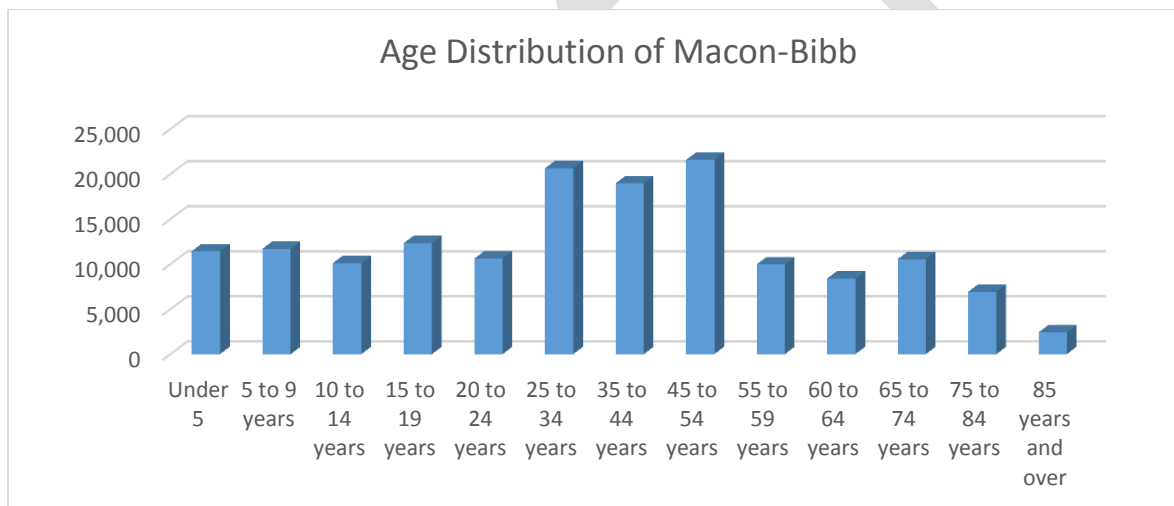


Figure 2: Age of Population (ACS 2009-2013)

Gender

Females make up approximately 52.8% of the population, whereas males comprise the other 47.2%. This creates a ratio of 0.9, or 0.9 males for every female. Comparatively, the ratio of males to females in the United States is 0.97 males for every female. The gender distribution for Macon-Bibb is listed in Figure 3 below.

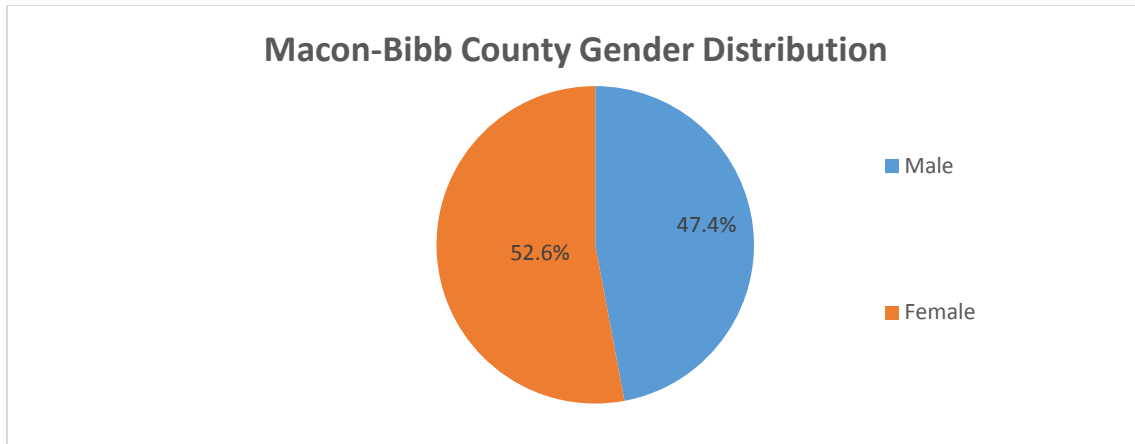


Figure 3: Macon-Bibb County Gender Distribution (ACS 2009-2013)

Racial Composition

According to the most recent ACS, Macon-Bibb County's population is 43.4% white, 47.3% African-American , 0.2% American Indian, 1.1% Asian and 1.3% other races. An analysis of the past 3 Censuses reveals what appears to reveal a net out-migration of whites and a net in-migration of -Americans into Macon-Bibb. The white population decreased by 19,053 persons, a 22.1% decrease between 1990 Census to the 2010 Census. Inversely, the African-American population increased by 10,292, a 22.9% increase, from the 1990 Census to the 2010 Census.

Figure 4: Comparison of Macon-Bibb County's Racial Composition, U.S. Census 1990

1990 Bibb County		
Race	Number	Percentage
White	86,252	57.5%
Black or African American	62,526	41.7%
American Indian or Alaskan Native	190	0.1%
Asian & Pacific Islander	791	0.5%
Some Other Race	208	0.3%
Two or More Races	N/A	N/A

Figure 5: Comparison of Macon-Bibb County's Racial Composition, U.S. Census 2000

2000 Bibb County		
Race	Number	Percentage
White	77,147	50.1%
Black or African American	72,818	47.3%
American Indian or Alaskan Native	272	0.2%

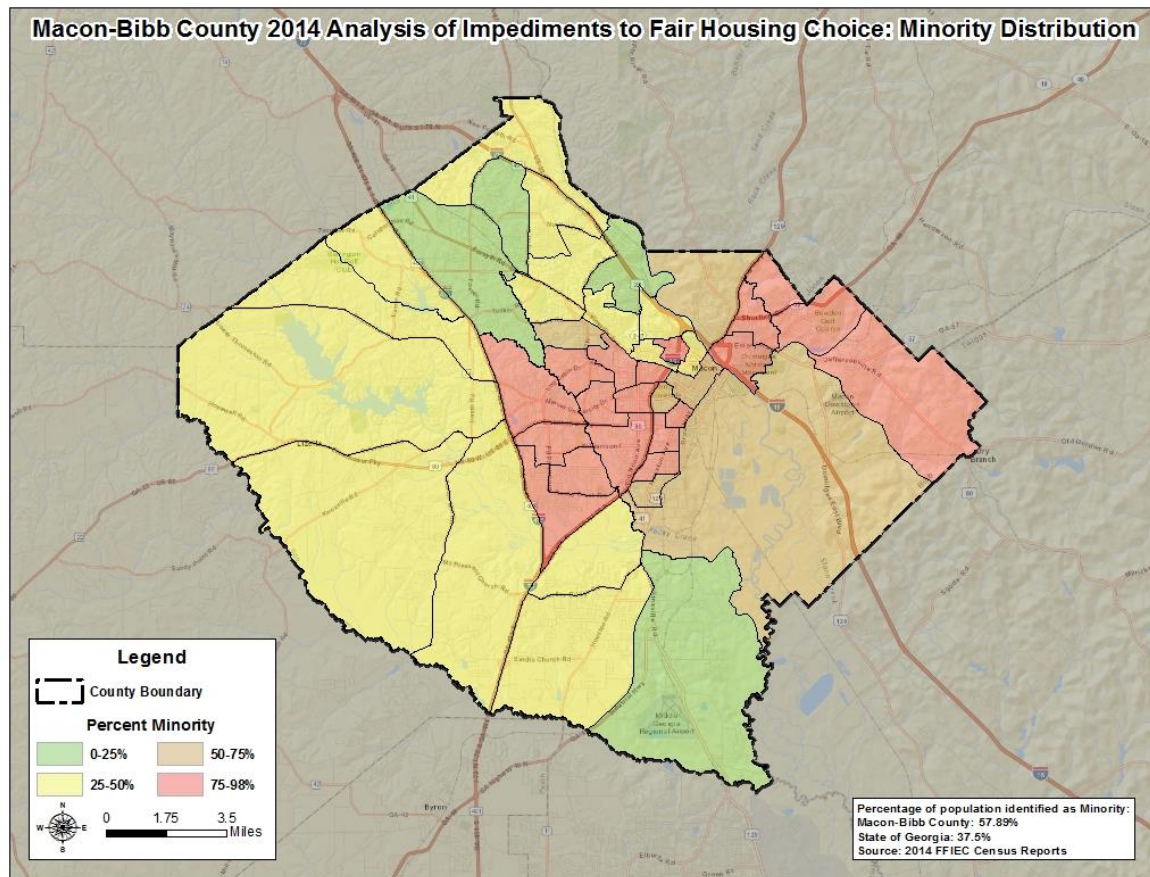
Asian	1,658	1.1%
Native Hawaiian or Pacific Islander	36	0.0%
Some Other Race	714	0.5%
Two or More Races	1,242	0.8%

Figure 6: Comparison of Macon-Bibb County's Racial Composition, U.S. Census 2010

2010	Bibb County	
Race	Number	Percentage
White	67,199	43.2%
Black or African American	81,116	52.1%
American Indian or Alaskan Native	332	0.2%
Asian	2,531	1.6%
Native Hawaiian or Pacific Islander	120	0.1%
Some Other Race	2,014	1.3%
Two or More Races	2,235	1.4%

The map below shows the percentage of non-white persons living throughout Macon-Bibb County. Minorities make up approximately 56.7% of the population in the County. The largest percentage of minorities are located in Census Tracts 104 (97.1%), 115 (96.9%), 111 (95.8%), 125 (95.7%), and 127 (94.7%). These Census Tracts are mostly located in the Central to Northeastern portion of the County, around the former corporate limits of Macon. As distance from the city limits increases, the minority population decreases.

Figure 7: Macon-Bibb County Minority Distribution



Economic Indicators

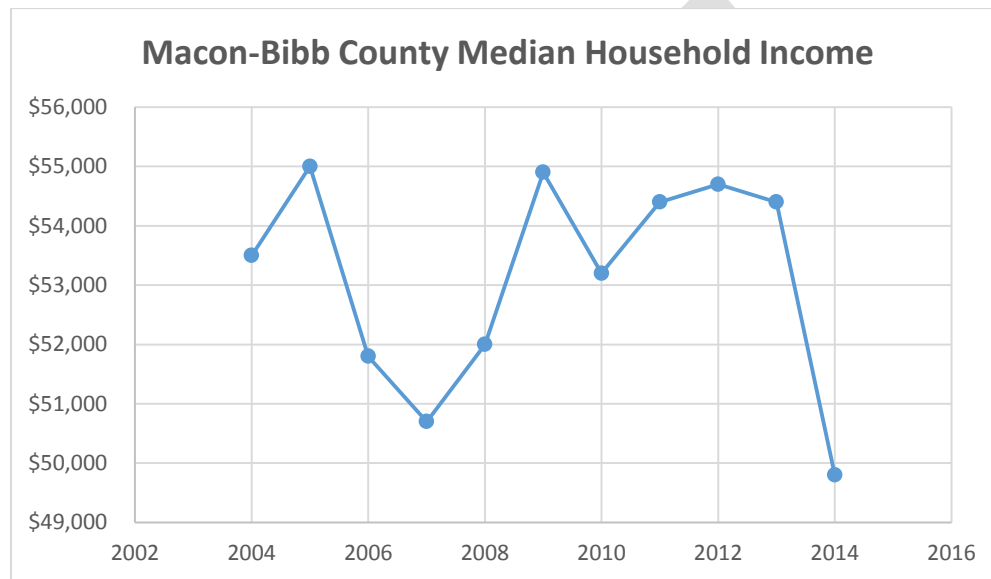
Income

Household Income is the most important factor in determining a household's ability to balance housing costs with other basic life necessities. Household Income is the means by which most individuals and families finance consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population. While economic factors that affect a household's housing choice are not a Fair Housing issue per se, the relationships between household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise Fair Housing concerns.

As seen in Figure 6 below, the median household income for Macon-Bibb County experienced irregularity over the past ten years. After increasing to its highest point of \$55,000 in 2005, median household income in Macon-Bibb plummeted by more than \$4,300 over the next two years. From 2008 to 2009, the county's per capita income sharply rose to just below its previous high from 2005. After a series of rising and falling once again, Macon-Bibb

County's per capita income has once again plummeted to its lowest point in a decade at \$49,800 for 2014. Fortunately, this was still higher than the state's per capita income of \$49,604 that same year.

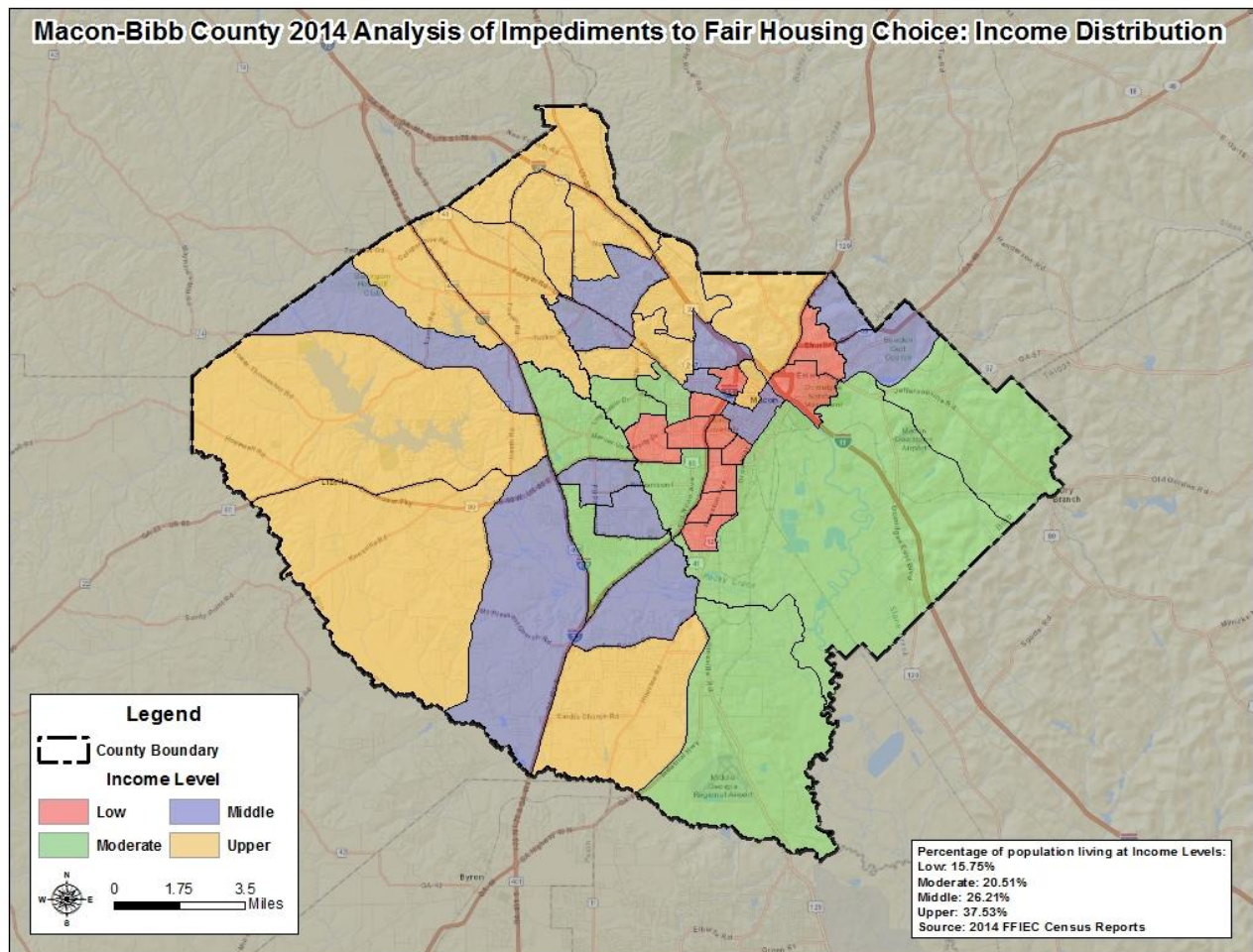
Figure 8: Bibb Median Household Income



Source: U.S. Bureau of Economic Analysis

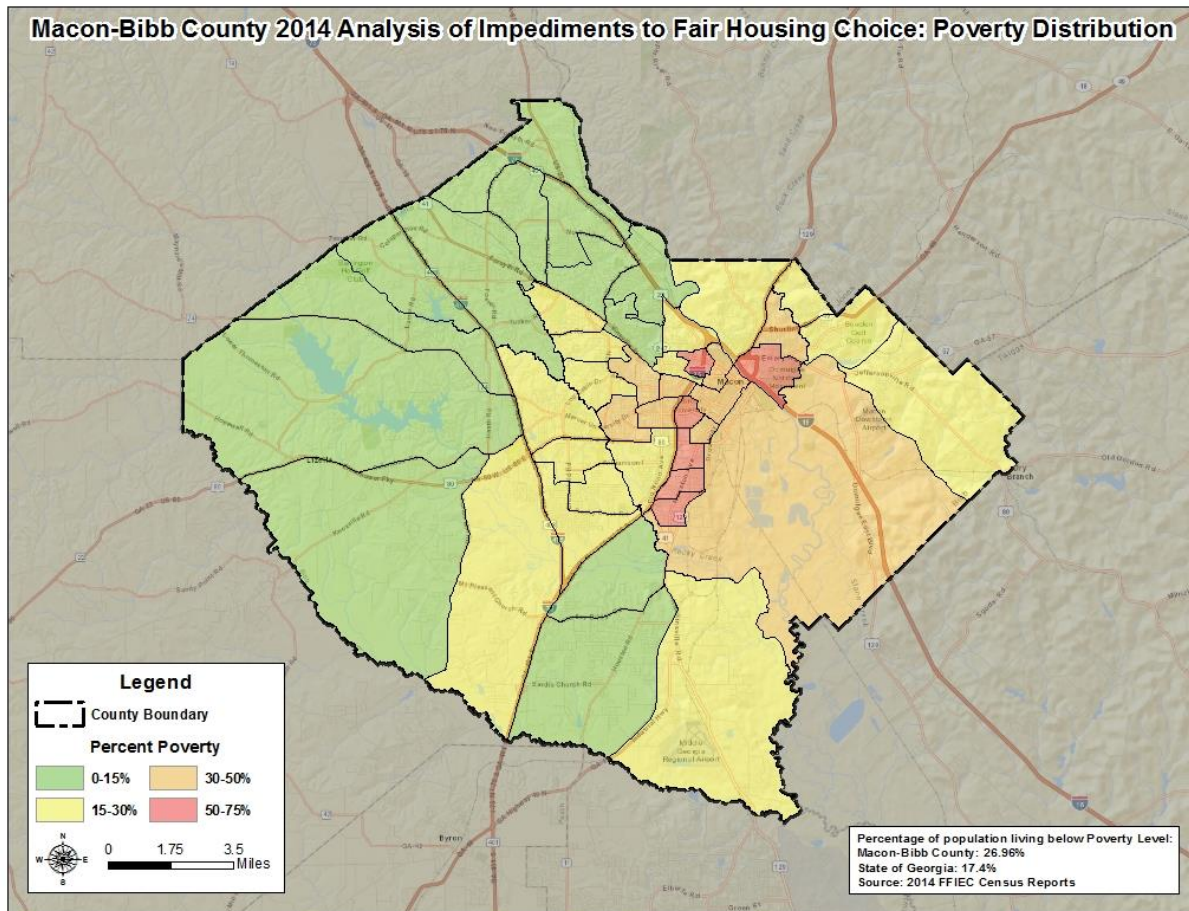
The map below illustrates the distribution of income throughout Macon-Bibb County by Census Tract, identifying whether the tract is considered low, moderate, middle, or upper income. This information is derived from the Federal Financial Institutions Examination Council (FFIEC) Census data, but is based on Census 2010 numbers and HUD's definition of income. From this map, it is evident that the concentration of low and moderate income households lies within the former city limits of Macon, as compared to Macon-Bibb County, concentrated around downtown and within the boundaries of Interstates 16, 475 and 75. Upper income households can be found in North and West Macon-Bibb County.

Figure 9: Macon-Bibb County Income Distribution



To mirror the previous map, figure 10 describes the distribution of poverty across Macon-Bibb County by Census Tract. The areas of greatest poverty concentration remain within the former city limits of Macon and around the downtown area.

Figure 10: Poverty Distribution



According to the 2009-2013 ACS (5-year estimate), roughly 20.5% of all families and 24.9% of Macon-Bibb County residents fell below the poverty line. Of all children under the age of 18, 36.8% lived in poverty while 12.8% of all Macon-Bibb residents aged 65 or older had income below the poverty level.

Figure 11: Macon-Bibb County Poverty Percentages

MACON-BIBB COUNTY POVERTY PERCENTAGES	
PERCENTAGES OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL	
All Families	20.5%
With related children under 18 years	31.3%
With related children under 5 years only	38.0%
Married Couple Families	9.1%
With related children under 18 years	9.1%
With related children under 5 years only	14.7%

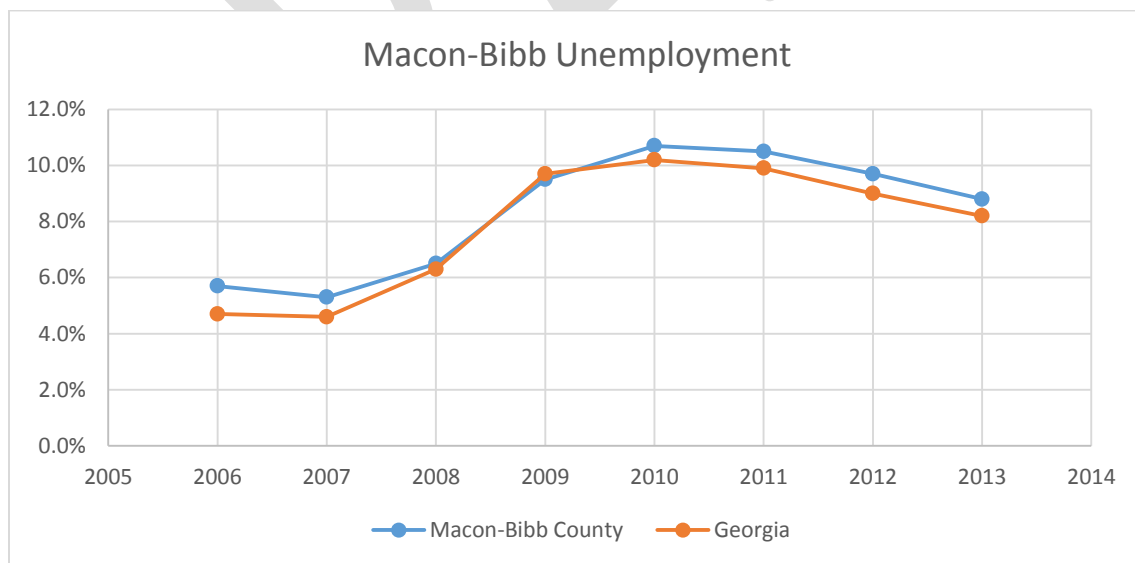
Families with female householder, no husband present	45.7%
All People	24.9%
Under 18 Years	36.8%
With related children under 18 years	36.6%
With related children under 5 years	44.4%
With related children 5 to 17 years	33.5%
18 years and over	20.7%
18 to 64 years	22.4%
65 years and over	12.8%
People in families	23.0%
Unrelated individuals 15 years and over	33.3%

Source: American Community Survey, 2019-2013

UNEMPLOYMENT

Unemployment rates in Macon-Bibb County tend to coincide with the overall rates of the State of Georgia. As illustrated by the graph below, both state and local unemployment rates hovered below 5%. As the downturn in the economy made its way to the Southern States in mid-2007, unemployment rates began to rise. As the effects of the most recent recession continue to dissipate, Macon-Bibb County's unemployment rate has been slower to recover than that of the state, which has dropped to around 8%.

Figure 12: Macon-Bibb Unemployment



Source: Georgia Department of Labor Profile: Bibb County

Employment

Macon-Bibb County has a labor force of approximately 69,480 individuals according to the 2014 Georgia Area Labor Profile. Of those, approximately 63,881 are employed, whereas 5,599, or 8.1%, are unemployed. The average unemployment rate in 2014 for Bibb County was slightly lower than that of the State of Georgia's average of 8.2%, but was higher than the national average of 7.4% in the same year. The Area Labor Profile summarizes numbers and averages from both the Georgia Department of Labor and the U.S. Bureau of Labor Statistics. Table 13 below describes the industry mix for Bibb County in 2014.

Figure 13: Macon-Bibb County Employment Mix

Macon-Bibb County Employment Mix				
Industry	Number of Firms	Employed Persons	Percent of Labor Force	Average Weekly Wage
Goods-Producing	412	7,111	8.6 %	\$1,058
Service-Providing	3,801	65,728	79.2 %	\$780
Unclassified	153	183	0.2 %	\$956
Government	170	9,972	12.0 %	\$764
Total	4,536	82,994	100 %	\$802

Source: Georgia Department of Labor Profile for Bibb County

Commuting Patterns

Figure 14 below describes where employed residents of Macon-Bibb County travel to work. These numbers are also from the Georgia Area Labor Profile, but based on the 2010 Census. The number of individuals employed may be somewhat low for current estimates since they are more than 3 years old, but the percentages should still create an accurate representation today. The majority of Macon-Bibb County residents are also employed within the county.

Figure 14: Commuting Patterns of Macon-Bibb County Residents

County Where Employed	Number	Percent
Macon-Bibb	51,047	83.6%
Houston	4,466	7.3%
Jones	863	1.4%
Monroe	759	1.2%
Peach	536	0.9%
Fulton	467	0.8%
Henry	280	0.5%
Crawford	258	0.4%
Other	2,397	3.9%
Total	61,073	100%

Source: Georgia Department of Labor Profile for Bibb County

Figure 15, as seen below, describes where those employed in Macon-Bibb County reside. The largest portion, roughly 62%, live and work in Macon-Bibb County, whereas the remaining employees are generally from neighboring counties.

Figure 15: Residence of Macon-Bibb County Employees

County of Residence	Number	Percent
Macon-Bibb	51,047	62.2%
Houston	8,153	9.9%
Jones	7,122	8.7%
Monroe	4,035	4.9%
Peach	2,122	2.6%
Crawford	1,944	2.4%
Twiggs	1,437	1.8%
Henry	675	0.8%
Other	5,507	6.7%
Total	82,042	100%

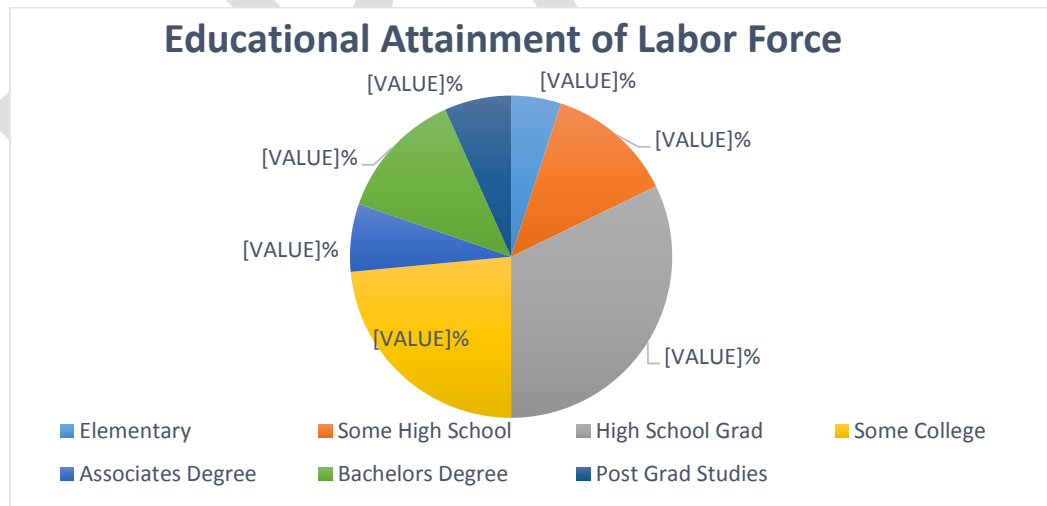
Source: Georgia Department of Labor Profile for Bibb County

Due to the availability of personal transportation, commuting is somewhat common to Macon-Bibb County. The majority, or about 92% of Macon-Bibb County's residents commute to work by means of car, truck or van. Of the 92% that drive, 83% drive alone and 10% carpool with one or more persons. About 1% take public transportation, whereas 4.3% of Macon-Bibb County residents walked to work or traveled by other means. Only 2.2% of residents worked from home.

Educational Attainment

The figure below describes the educational attainment of Macon-Bibb County's labor force. Roughly 32% of residents have only a high school diploma or GED. About 20% of residents have a college degree or higher.

Figure 16: Educational Attainment of Bibb County Labor Force



Source: ACS 2009-2013

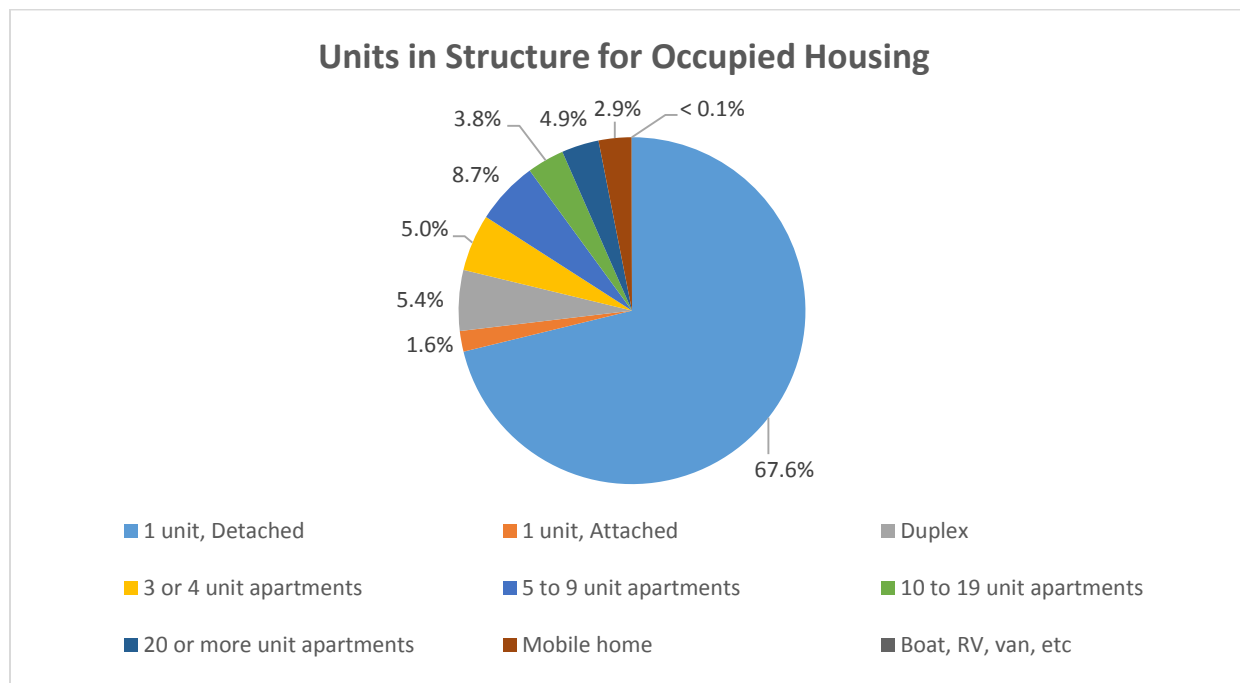
OVERVIEW OF HOUSING SUPPLY

According to the 2009-2013 American Community Survey, of the 69,776 total housing units in Macon-Bibb County, approximately 56,585 (81.8%) are occupied housing units. Of these units, 54.5% of those are owner-

occupied and 45.6% are renter-occupied. Of the owner-occupied housing units, the median value is \$123,000. This amount has increased from \$120,082 (2.4%) in 2000. In comparison, the median value for an owner-occupied housing unit for the United States is \$181,400.

The majority of homes in Macon-Bibb County (67.6%) are single, detached homes. Apartment complexes and duplexes containing two or more housing units per structure make up a remainder of the housing stock, with less than 3% consisting of manufactured or mobile homes, as seen in Figure 17 below.

Figure 17: Number of Units in Structures for Occupied Housing

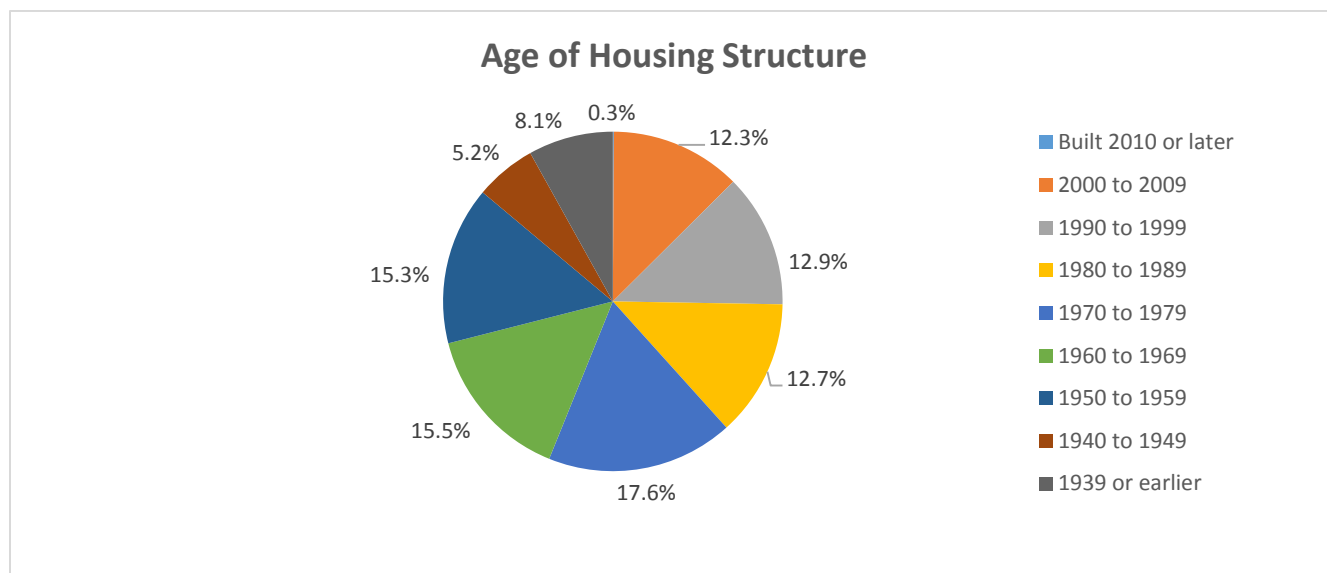


Source: ACS 2009-2013

AGE AND CONDITION

The ACS 2009-2013 estimates show that the majority of Macon-Bibb's housing stock, 62% were built prior to 1970, making most of the housing units 30 years or older. Another large portion of the homes, over 40%, are nearing 50 years old, which will subject them historic considerations when doing any sort of renovation. An aging housing stock can become quite expensive as many of the homes are in need of maintenance. This is important to take note of because endeavors to renovate and/or remodel aging structures can be financially burdensome to both owners and renters. In figure 5, a breakdown of the age of Macon-Bibb's housing supply can be found on the following page.

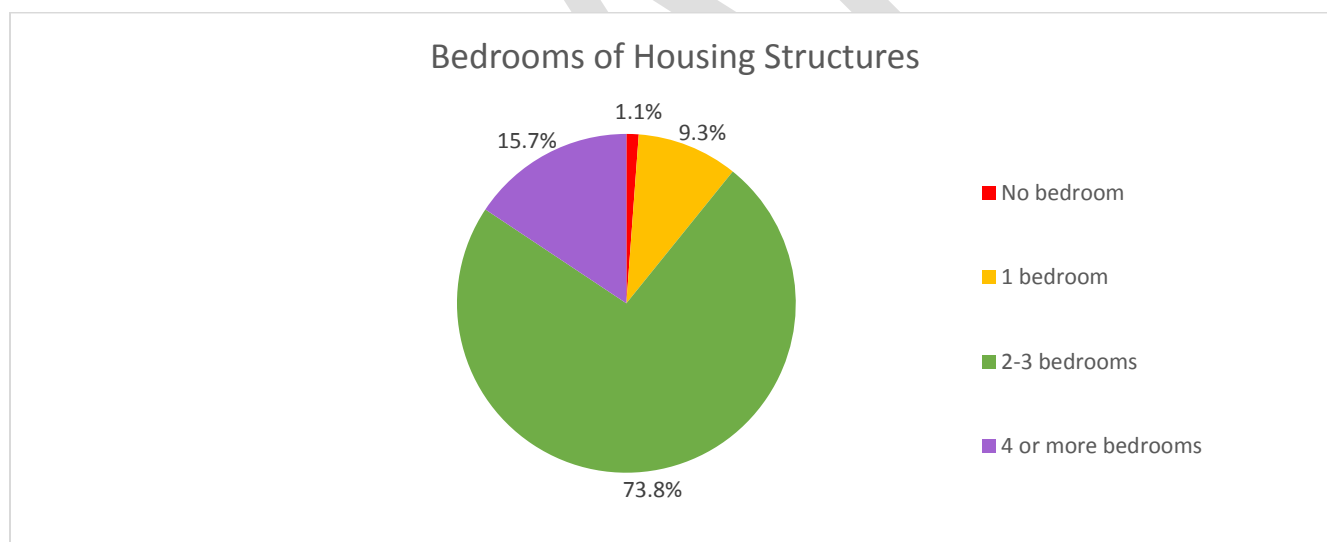
Figure 18: Year Housing Structure Built in Macon-Bibb County,



Source: ACS 2009-2013 Estimates

The majority of homes in Macon-Bibb contain 2 or 3 bedrooms as seen below in Figure 19.

Figure 19: Number of Bedrooms per Housing Unit



Source: ACS 2009-2013 Estimates

Affordability in Housing

All affordable housing programs provided by or through the government have maximum income limits to qualify for assistance. These income limits are typically derived from the Area Median Income (AMI), the theoretical family income of the average household in a given geography.

The AMI is updated each year for each geographical area taking into consideration specific economic indicators. The geographical areas used for establishing the AMI are either Metropolitan Statistical Areas (MSA's) or counties. The 2015 Area Median Income for a family of four in Macon-Bibb County is \$52,700.

The income limits used for Section 8, public housing, Low Income Housing Tax Credit, the HOME program and other Federal programs all are derived from the HUD defined AMI. The 2015 Income Limits can be found on the figure 20 below.

Figure 20: Macon-Bibb County 2015 Income Limits

Macon, GA MSA										
FY 2015 Income Limit Area	Area Median Income (AMI)	FY 2014 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Macon- Bibb County, Ga	\$52,700	Extremely Low Income (30%) Limit	\$11,770	\$15,930	\$20,090	\$24,250	\$28,410	\$30,600	\$32,700	\$34,800
		Very Low Income (50%) Limit	\$18,450	\$21,100	\$23,750	\$26,350	\$28,500	\$30,600	\$32,700	\$34,800
		Low Income (80%) Limit	\$29,550	\$33,750	\$37,950	\$42,150	\$45,550	\$48,900	\$52,300	\$55,650

Source: Huduser.gov Income Limits

To qualify for most rental assistance programs, a renter must earn no more than 50% of the Area Median Income (AMI). In some cases, rental assistance is reserved for renters earning 30% or less of the AMI. In Macon-Bibb County, to qualify for Section 8 assistance, a renter household containing four persons must earn \$26,350 or less. For some targeted rental assistance programs, a renter household of four must earn less than \$24,250.

Fair Market Rents (FMR)

HUD establishes a Fair Market Rent (FMR) each year for each Metropolitan Statistical Area in the country. This rent standard is used to establish payment limits for Section 8 Housing Choice Vouchers, maximum rents in HOME financed rental projects and initial or renewal rents for Section 8 project based assistance. HUD establishes FMR's for 530 MSA's and 2,045 counties nationwide each fiscal year.

Figure 21: Fair Market Rents

2015 Fair Market Rent for Macon-Bibb County					
County/MSA	No Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Macon-Bibb County	\$488	\$586	\$695	\$960	\$1,049

Source: Huduser.gov Income Limits

The FMR is largely a statistical derivative of the US Census Bureau's American Community Survey (ACS) five-year estimates for two-bedroom median rent. In Macon-Bibb, the Fair Market Rent (FMR) for a two-bedroom apartment is \$695. In order to afford this level of rent and utilities – without paying more than 30% of income on housing – a household must earn \$2,316 monthly or \$27,792 annually. Assuming a 40-hour work week at 52 weeks per year, this level of income translates into a renter wage of \$13.36 needed by the household to afford two-bedroom housing.

Housing Problems

HUD outlines three (3) scenarios in which a household has a housing problem:

1. If a household pays more than 30 % of its gross monthly income for housing, it is considered cost burdened. HUD considers households that pay more than 50 % of their income on housing costs to be severely cost burdened.
2. If a household occupies a unit that lacks a complete kitchen or bathroom, then the unit has a physical defect.
3. If a household contains more members than the unit has rooms, then the unit is overcrowded.

In examining the latest Comprehensive Housing Affordability Strategy (CHAS) data for 2011-2013, it is evident that housing problems exist in Macon-Bibb. According to HUD's definition, 42.1% of renters were cost burdened and 28% were severely cost burdened. It is also important to note that by the same standard, homeowners experience an even greater housing problem; 73.7% were cost burdened and close to 16% are severely cost burdened.

According to ACS 2009-2013 ACS, 520 households, or 0.9 % of all households, lack complete kitchen facilities. Similarly, 0.5% of all households- totaling 297 households- lack complete plumbing facilities.

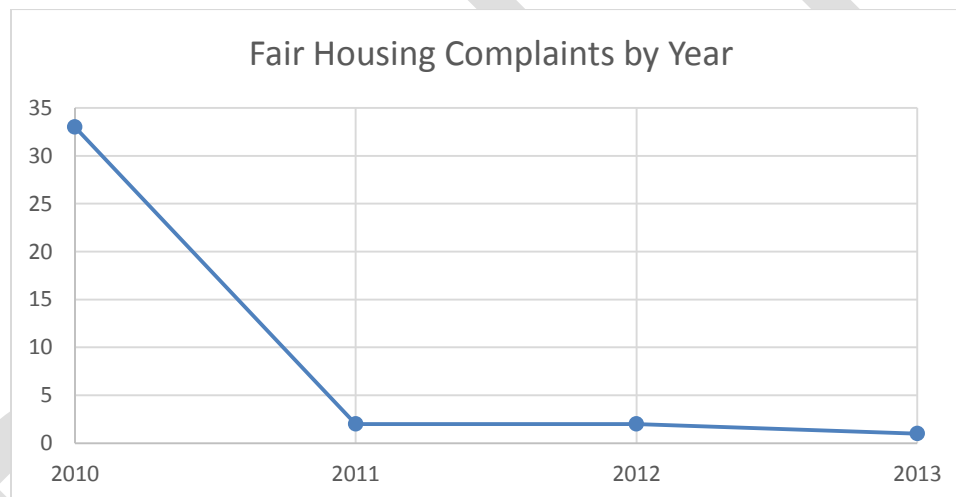
Using the same ACS data, it is estimated that 264 owners (or 0.5% of all owners) in Macon-Bibb County were overcrowded. A greater number and percentage of renters were overcrowded: 735 or 4% of all renters.

SECTION III. JURISDICTION’S CURRENT LEGAL STATUS

Fair Housing Complaints filed with the U.S. Department of Housing & Urban Development (HUD)

When evaluating Fair Housing and availability, it is imperative to consider individual complaints of illegal discrimination. The availability of complaint data can serve as an indicator of the potential for discriminatory activities. There are three sources of information regarding Fair Housing complaints made in Macon-Bibb County. These include the U.S. Department of Housing and Urban Development, the U.S. Department of Justice, and the Georgia Commission on Equal Opportunity. When analyzing the number of housing complaints documented by HUD over recent years, it was observed that there has been a sharp decline in the number of complaints filed in Macon-Bibb County. In the three years following the most recent AI, the number of complaints have fallen from two complaints filed in 2011 and 2012, to only a single complaint in 2013. An illustration of complaints since 2010 can be found on the chart below depicting this decline.

Figure 22: Filed Discrimination Cases



Source: Housing and Urban Development

Of the complaints filed, four complaints were submitted alleging racial discrimination while one complaint alleged discrimination based on disability. Overall, the data provided by HUD shows a lack of Fair Housing complaints over the past three years. It is important to note that potential acts of discrimination may go unnoticed by or unreported if those seeking housing are uneducated on their rights to Fair Housing or are unaware of how to report potential discrimination. Therefore, it is vital that Macon-Bibb County continue to educate residents and developers on Fair Housing policies and resources to assure that cases of alleged Fair Housing violations remain low.

SECTION IV. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Public Sector Policies

An important element of the analysis includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in Macon-Bibb County to determine opportunities for furthering the expansion of Fair Housing choice.

Zoning and Land Use

The Fair Housing Act of 1968, as amended, also makes it unlawful for municipalities to utilize their governmental authority, including zoning and land use authority, to discriminate against racial minorities or persons with disabilities. Zoning ordinances segregate uses and make differentiations within each use classifications. While many promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, these measures may also have the affect of excluding lower-income and racial groups.

Adopted in 1952 and amended in 1981, the Macon-Bibb County Comprehensive Land Development Resolution has guided land development for all of Macon-Bibb County. The Macon-Bibb County Planning and Zoning Commission has been charged with development of and enforcement of all the provision set forth. The purpose of the resolution, as outlined within, seeks to achieve the following:

- To prevent flooding of improved property;
- To prevent overcrowding of schools or other public facilities;
- To achieve such timing, density, and distribution of land development and use as will prevent overloading systems for providing water supply, sewage disposal, drainage, sanitation, police and fire protection, and other public services;
- To achieve such density, distribution and design of land development and use as will protect and preserve the design capacity of the streets and roads within the city and county and prevent traffic congestion and traffic hazards;
- To encourage such distribution of population, land development and use as will facilitate the efficient and adequate provision of public services and facilities;
- To achieve such density, design, and distribution of housing, as will protect and enhance residential property values;
- To secure such accessibility, design and density of land development and use as will reduce fire hazards and fire losses;
- To promote the continued and safe operation of general purpose airports within the county;
- To promote the health, safety, morals, convenience, order, prosperity, and welfare of the present and future inhabitants of Macon and Bibb County, Georgia;
- To encourage greater efficiency and economy of land development;
- To preserve the city's and county's natural beauty and encourage architecturally pleasing development; and;

- To improve the quality of life through protection of the city's and county's total environment including, but not limited to, the prevention of soil erosion and air, water, and noise pollution.

To develop the Analysis of Impediments, the Middle Georgia Regional Commission reviewed the Macon-Bibb County Land Development Resolution to determine if the ordinances have created impediments to Fair Housing. The findings represent an analysis of the following parameters:

- Review of the definitions within the ordinance section, more specifically the definitions of family; dwelling; group care home; and manufactured home.
- Determining whether the above-referenced definitions place undue restrictions on minorities and protected groups with respect to their ability to attain housing on an equal basis.
- Review of zoning classifications and allowances for group homes, multifamily dwellings, and manufactured homes to determine whether certain dwellings are restricted to less desirable locations within the community.
- Review of lot size requirements to determine whether or not it is difficult to develop affordable housing within the community.

Definitions

The following terms and definitions found in the Macon-Bibb County Comprehensive Land Development Resolution are significant for the purpose of developing the Analysis of Impediments.

Dwelling. Any site built (building constructed in conventional manner) building, industrial dwelling (modular home) or portion thereof which is designed for or used for residential purposes. The term dwelling, as used in these regulations, is not to be construed to include manufactured homes, travel trailers, housing mounted on self-propelled or drawn vehicles, tents or other forms of portable or temporary housing. (Amended November 22, 1999, ZA99-11-02)

Dwelling unit. One (1) or more rooms in a residential building or residential portion of a building which are arranged, designed, used, or intended for use as a complete, independent living facility for one (1) family, and which include permanent provisions for living, sleeping, eating, cooking and sanitation.

Dwelling, multifamily. A building consisting of three (3) or more dwelling units with varying arrangements of entrances and party walls; excluding single-family attached dwellings as defined in Section 1.02[41].

Dwelling, tenant. A residential structure located on a farm and occupied by a no transient farm worker employed by the owner of the farm.

Dwelling, two-family (duplex). A building designed for or occupied exclusively by two (2) families living independently of each other.

Dwelling, single-family detached. A detached building designed for or occupied exclusively by one (1) family.

Dwelling, single-family attached. One (1) of a series of two (2) or more single-family dwelling units on separate lots or in condominium ownership, which are joined at one (1) or more points by one (1) or more party walls or other common facilities not including the walls of an enclosed courtyard or similar area.

Group personal care homes:

a residential care facility wherein: (a) The operator is not legally related to the individuals supervised and is licensed by the State of Georgia to provide community alternatives in a residential environment to institutional care for individuals in need of such care; (b) More than four (4) persons reside, including operators, supervisors, and individuals under care; and(c) Such individuals are provided with room, board, personal, physical care and supervision in a family environment. The term "group personal care home" shall include, without limitation by reason of enumeration, home as established under the "Community Services Act for the Mentally Retarded" (Ga. Laws 1972, page 700), and other homes of similar intention and purpose; but shall not include facilities housing persons convicted of crimes but not housed in penal institutions. The number of persons occupying a group home as defined herein shall not exceed fifteen (15) in number at any given time, including a minimum of one (1) supervisory personnel. (Amended December 17, 1984, ZA84-12-01)

Manufactured Homes and Communities:

Manufactured homes: A building transportable in one (1) or more sections which is built on a permanent chassis and designed to be used as a single-family residence with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained therein; sometimes referred to as mobile homes or house trailers. O.C.G.A. § 8-2-131(3). This structure will have a HUD decal. (Added November 22, 1999, ZA99-11-02)

Manufactured home community. A contiguous parcel of land under single ownership which has been planned and improved for the placement of three (3) or more manufactured homes for residential occupancy. (Added November 22, 1999, ZA99-11-02)

Manufactured home subdivision. A subdivision designed and/or intended primarily, (but not exclusively) for the sale of individual lots for the placement of manufactured homes. (Added November 22, 1999, ZA99-11-02)

Mobile home. A manufactured home that was built prior to June 16, 1976 and which does not have affixed to it the seal of approval of the U.S. Department of Housing and Urban Development. (Amended November 22, 1999, ZA99-11-02)

Summary of Findings

In reviewing the definitions, it was observed that several terms commonly used throughout the zoning ordinance, but are not specifically defined. These terms include "family," "single-family," or "multi-family." Additionally, the definition of the term "tenant" only pertains to farm workers that rent dwellings located on farms.

Permitted and Conditional Uses

The Macon-Bibb County Land Development Resolution contains a number of regulations that affect affordable housing. The following chart shows the classifications in which various types of residential uses are allowed on either a permanent or conditional basis. Conditional uses permits are obtained through an application/hearing process. A chart showing permitted and conditional uses are found on the following page.

Figure 24: Permitted and Conditional Uses

	R-1AAAA	R-1AAA	R-1AA	R-1A	R-1	R-2A	R-2	R-3	A	RR	C-1	C-2	CBD-1	CBD-2	C-4	C-5
Single-family Dwellings	x	x	x	x	x	x	x	x	x*	x*	x*	x*	x*	x*	x*	
Garage apartments									x							
Dwellings in existing buildings (upper floors)													x*	x*		
Dwellings in existing buildings (1&2-family on ground floor)													x*	x*		
Two-family				x*	x*	x	x	x	x*		x*	x*	x*	x*	x*	
Residential Cluster Development						x*	x*	x*								
Single-family detached cluster		x*	x*	x*	x*											
Single-family attached cluster			x*	x*	x*											
Multifamily						x*	x*	x*							x*	
Multi-family on ground floor													x*	x*		
High-rise								x					x*	x*		
Boarding/rooming/frat/sorority								x								
Manufactured Homes									x							
Mobile home parks								x*								
Manufactured homes subdivision									x*							
Manufactured home communities									x*							
Travel trailer parks									x*							
Group Care Homes								x	x		x	x		x	x	
Convalescent homes															x	

*Allowed, but subject to specific requirements as given in the ordinances

Index to Abbreviations

R1AAAA, R-1AAA, R-1AA, R-1A, R-1: Single-Family Residential District

R-2A, R-2: Two Family Residential District

R-3: Multi-Family Residential District

A: Agricultural District

RR: Rural Residential District

C-1: Neighborhood Commercial District

C-2: General Commercial District

CBD-1, CBD-2: General Commercial District

C-4: Highway Commercial District

C-5: Neighborhood Convenience Center District

Figure 24 continued.

	PDR	PDC	PDI	PDE	HR-1	HR-2	HR-3	HC	HPD	MHR	RP	M-1	M-2	M-3
Single-family Dwellings	x*			x*	x	x	x	x*	x	x	x	x*		
Garage apartments														
Dwellings in existing buildings (upper floors)														
Dwelling in existing buildings (1&2-family on ground floor)														
Two-family	x*			x*		x*	x*	x*	x			x*		
Residential Cluster Development	x*			x*						x*				
Single-family detached cluster										x*				
Single-family attached cluster										x*				
Multifamily	x*			x*			x*	x*	x*					
Multifamily on ground floor														
High-rise														
Boarding/rooming/fraternity/sorority														
Manufactured Homes										x*	x			
Mobile home parks														
Manufactured homes subdivision										x*				
Manufactured home communities										x*				
Travel trailer parks														
Group Care Homes	x			x								x		
Convalescent homes														

*allowed, but subject to specific conditions given in the ordinance

Source: Macon-Bibb County Land Development Resolution

Index to Abbreviations

PDR: Planned Development Residential District
PDC: Planned Development Commercial District
PDI: Planned Development Industrial District
PDE: Planned Development Extraordinary District
HR-1, HR-2, HR-3 Historic Residential District
HC: Historic Commercial District

HPD: Historic Planned Development District
MHR: Mobile Home Residential District
RP: River Protection
M-1: Wholesale and Light Industrial
M-2: Industrial District
M-3: Heavy Industrial District

Summary of Findings

According to the chart above, 63 % of the permitted uses in Macon-Bibb County are on a conditional basis. This presents a potential barrier as land development in specific zoning areas could be hindered by over-burdensome regulations. For example, group care homes are permitted by right only in planned development residential (PDR) and planned development extraordinary districts. They are conditionally permitted in Agricultural, Commercial 1, 2 and 4; Central Business District 2; and M-2 Light Industrial. By limiting the placement of group care homes, disabled, formerly homeless or other persons with special needs may suffer exclusion from residential neighborhoods and may be forced to live in less desirable areas of Macon-Bibb County. Similar to the minimal allowance of group care homes, multi-family dwellings are only permitted in the Planned Development Residential (PDR) and the Planned Development Extraordinary District (PDE). The restriction of multifamily

housing to only a few zones, in addition to the requirement for a hearing to grant conditional use, can create potential barriers to affordable housing choice and development.

It should be noted that though these policies might potentially restrict access to development, zoning guidelines are designed to protect the rights of existing property owners. In some cases, multi-family housing developments are limited or restricted due to the increased strains on existing infrastructure such as water, gas, electricity and roads. Additionally, the requirement for public meetings to grant conditional use of the property is to protect the rights of surrounding property owners and allow them a voice in the process. In these cases, areas that are zoned in this manner only appear to be restrictive, when in actuality, the policies are a thoughtful attempt at planned development throughout Macon-Bibb County.

Building Requirements

The chart below shows the minimum lot area requirements (in square feet) for dwellings in residential districts within Macon-Bibb County. The lot requirements have not changed under consolidation. Although the requirements for zones with septic tanks remain steady, there is a large variance between zones with public sewer facilities. For example, a housing unit with a public sewer line in the R-2 district must have a minimum lot coverage of 6,500 square feet and the unit must not cover more than 35% of the lot. By comparison, in the most restrictive residential district, R-1AAAA, a housing unit on a public sewer line must have a minimum lot coverage of 60,000 square feet and the unit must cover no more than 20% of the lot.

Figure 25: Minimum Lot Area Requirements

Minimum Lot Area Requirements and Maximum Lot Coverage Per District										
	R-1AAAA	R-1AAA	R-1AA	R-1A	R-1	R-2A	R-2	R-3	A	RR
With septic tank and well	60,000	43,560	43,560	43,560	43,560	43,560	43,560	43,560	43,560	43,560
With septic tank	60,000	20,000	15,000	12,000	10,000	20,000	20,000	10,000	43,560	43,560
With public sewer	60,000	20,000	14,000	10,000	6,000	9,000	6,500	6,000	43,560	43,560
Maximum lot coverage	20%	25%	25%	25%	35%	35%	35%	40%	25%	25%

Source: Macon-Bibb County Land Development Resolution

While zoning districts aim to vary densities in land use, the clustering of the most restricted residential zones can create areas affordable only to upper-income households. The expense of these large lot sizes can impede lower-income households from living in an area of their choice.

Summary of Findings

The Macon-Bibb County Land Development Resolution has been reviewed to determine if any provisions have unintentionally created impediments to Fair Housing. Upon review, there is implicit recognition that certain provisions of the zoning code do not provide initiatives for affordable housing. As noted in previous analyses of impediments, the clustering of restricted residential zones due to lot requirements can create areas only affordable to upper-income households, thereby limiting housing choices.

Local Ordinances

The legislature of the State of Georgia has authorized local governmental units to adopt verbatim the laws against discriminatory housing practices cited in O.C.G.A. §§ 8-3-202, 8-3-203, 8-3-204, 8-2-205 or 8-3-222 as a local ordinance. Macon-Bibb County has chosen to provide these same provisions in the consolidated code of ordinances adopted in December of 2013, found in Section 5-42, which are as follows:

(1) To provide for execution of policies embodied in Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988;

(2) To safeguard all individuals from discrimination in any aspect relating to the sale, rental, or financing of dwellings or in the provision of brokerage services or facilities in connection with the sale or rental of a dwelling because of that individual's race, color, religion, sex, disability or handicap, familial status, or national origin;

(3) To promote the elimination of discrimination in any aspect relating to the sale, rental, or financing of dwellings or in the provision of brokerage services or facilities with the sale or rental of a dwelling because of a person's color, religion, sex, disability or handicap, familial status, or national origin; and

(4) To promote the protection of each individual's interest in personal dignity and freedom from humiliation and the individual's freedom to take up residence wherever such individual chooses; to secure Macon-Bibb County against domestic strife and unrest which would menace its democratic institutions; to preserve the public safety, health, and general welfare; and to further the interests, rights, and privileges within Macon-Bibb County.

It is also important to note that the Macon-Bibb County Code of Ordinances provides a definition of the term “family” not previously found in the Land Resolution. For the purposes of the code, “family” is defined as:

“...one or more individuals, corporations, partnerships, associations, labor organizations, legal representatives, mutual companies, joint stock companies, trusts, unincorporated organizations, trustees, trustees in bankruptcy, receivers, or fiduciaries.”

Additionally, the Macon-Bibb County Code of Ordinances outlines unlawful practices in the selling or renting of dwelling units and gives the Economic and Community Development Department (ECDD) the responsibility of advancing Fair Housing and seeing that the Macon-Bibb County promotes Fair Housing practices.

Summary of Findings

The Middle Georgia Regional Commission reviewed the Macon-Bibb County Code of Ordinances to determine if any of the provisions set forth have inadvertently created impediments to Fair Housing. While the Macon-Bibb County Land Resolution does specifically mention Fair Housing, the Code of Ordinances for consolidated government provides an addendum which creates Fair Housing policies and establishes a means by which to enforce them. While the term “family” is not provided in the Land Resolution, the Code of Ordinances provides a sufficiently broad definition that does not impede unrelated individuals to live in a dwelling together. There is no indication that provisions established by the Code of Ordinances have created impediments to Fair Housing choice.

Comprehensive Planning

Georgia law requires municipalities to prepare Comprehensive Plans, including a Housing Element. This element establishes a goal of ensuring that all residents of the state have access to adequate and affordable housing. The Comprehensive Plan also includes a housing opportunities objective to provide quality housing and a range of housing size, cost, and density that should be provided in each community, to make it possible for all who work in the community to also live in the community. Local governments are required to evaluate the composition and quality of the community’s housing stock, the age and condition of housing, the cost of housing, the needs of households that are cost burdened, the relationship of local housing costs and availability to the

socioeconomic characteristics of these households and special housing needs in the community (e.g., housing needs of residents who are elderly; homeless; victims of domestic violence; migrant farm workers; persons with mental, physical, or developmental disabilities; persons with HIV/AIDS; and persons recovering from substance abuse).

Summary of Findings

The City's Housing Element, part of the 2006-2016 Comprehensive Plan, emphasizes the cost burden of housing especially upon low- and moderate-income households. It also notes the need for housing appropriate to the needs of the elderly, the disabled and other persons with special needs, including the need for group homes. The Element does not specifically identify measures, programs, or ordinances to address Fair Housing issues, but does recommend developing a range of housing opportunities, and "amending development regulations ... to remove impediments to the development of desirable housing types."

Urban Redevelopment

The City of Macon adopted an Urban Redevelopment Plan in March 2011 outlining areas of the city suffering from underdevelopment, pervasive poverty, and blight. These areas were identified as needing immediate attention to help enhance the quality of life of those residents living in and around the areas. Although the plan did not directly address advancing and promoting Fair Housing, the measures taken in implementing the plan were intended to improve the quality of life and equal housing opportunities in areas where there are concentrations of low-income and minorities. The city seeks to accomplish this through demolishing vacant, dilapidated structures in efforts to clean up blight and areas of higher crime, increased code enforcement, and attract private investment, to name a few examples.

It is important to note that the current Urban Redevelopment Plan was adopted before the consolidation of Macon and Bibb County. The current consolidated government has commissioned the preparation of a new Urban Redevelopment plan to incorporate areas of the county to include in the plan, which should be developed by late summer 2015.

Summary of Findings

From a Fair Housing perspective, one of the potential issues resulting from the implementation of an Urban Redevelopment plan would be the displacement of residents as blighted properties are condemned and torn down. To date, Macon-Bibb has not faced any situations where displacement was necessary. The purpose of the plan was to remove or rehabilitate blighted properties, especially those that were vacant. In the event that displacement becomes necessary, the city has specified that the plan will be amended to provide for relocation of residents to be provided.

Employment-Housing-Transportation Linkage

Macon-Bibb County contains 42.8 miles of highway classified as interstate, 46.0 miles classified as principal arterials, and 55.0 miles classified as minor arterials and collectors. Interstates I-16 and I-75 meet just north of downtown Macon and I-475 By-Pass runs through the western part of the County as well. Bibb County's location on the interstate system plays a key role in the economic vitality of the community where warehousing and distribution facilities have become more important to the local economy.

Transit

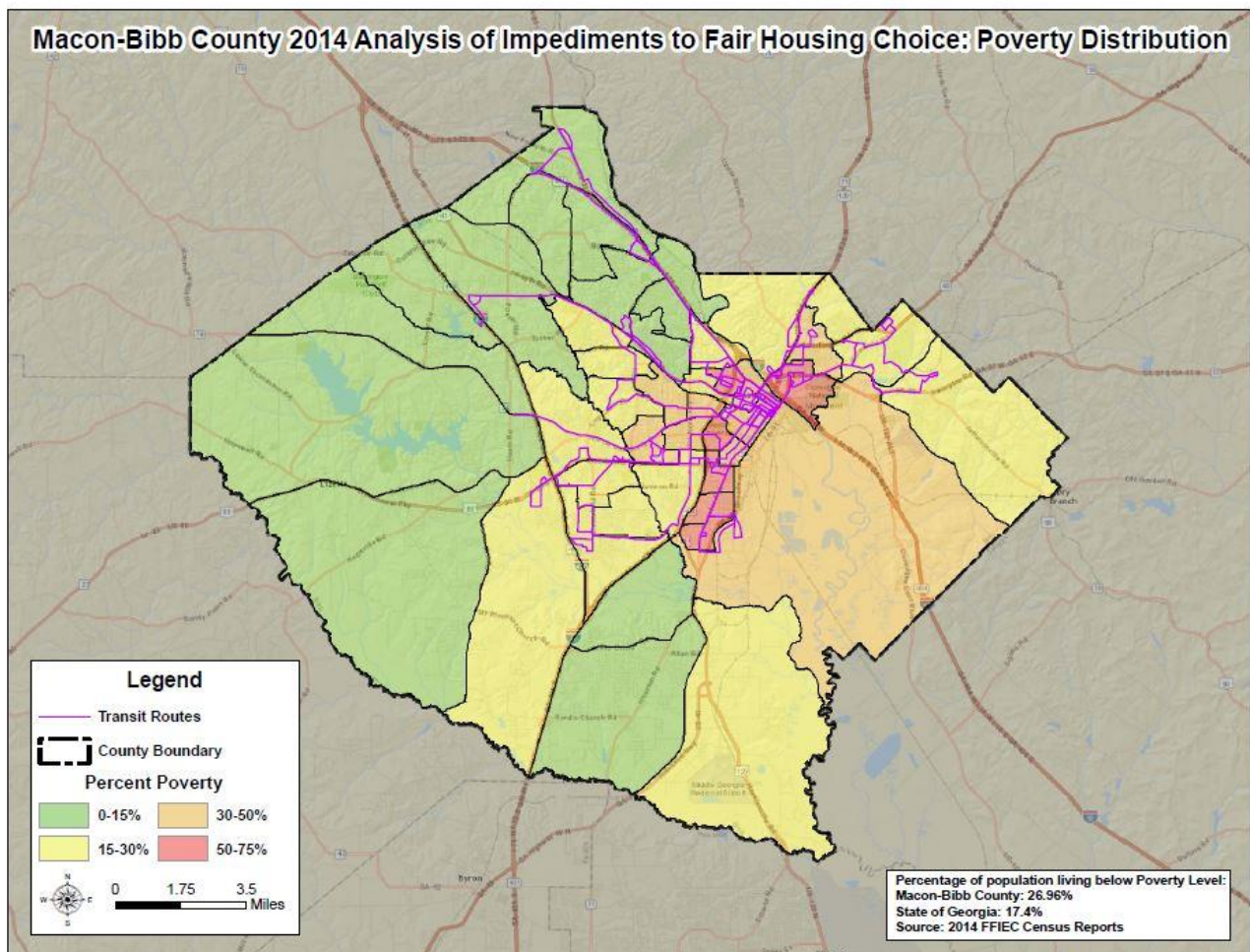
Public transportation can play a significant role in increasing the supply of affordable housing to low and moderate income populations and others protected under Fair Housing laws. The issues regarding transportation, employment and housing choice revolves around the accessibility of citizens to both home and work. If public transportation from a lower cost neighborhood is inefficient in providing access to employment centers, that neighborhood becomes inaccessible to those without dependable means of transportation, particularly very low-income residents, the elderly, and persons with disabilities

The Macon Transit Authority (MTA) operates a rather well-connected system within the City of Macon for a city of its size. The system in place contains nine (9) fixed routes, operating from 5:20 a.m. to 11:00 p.m., Monday through Friday, and from 5:20 a.m. to 8:00 p.m. on Saturdays. One-way, regular fare is \$1.25, with discounts offered to students and senior citizens. The Macon-Bibb County Long Range Transportation Plan for 2035 projected ridership in 2011 at 23,788 per day. Nine fixed bus routes are located in the area that was urbanized prior to the 1960's. Some service has been extended out to more recently developed commercial areas such as Tom Hill Drive/Northside Drive/I-75, Zebulon Road/I-475, and Macon College at I-475/Eisenhower Parkway.

MTA introduced a paratransit system in July 2007 catering toward persons who are unable to access the Macon-Bibb County Transit Authority Fixed services. The Paratransit service operates along the same coverage area as the Fixed Route system but with added coverage Paratransit will pick up riders who live $\frac{3}{4}$ mile on either side of Fixed Route.

A route map for the MTA bus system can be seen on the following page.

Figure 26: MTA Bus Routes



Source: Macon Transit Authority, U.S. Census

Summary of findings

While population growth in Macon-Bibb County has shifted to the unincorporated areas and to other surrounding counties, employment growth has shifted to the northwest portion. This growth is occurring in the North Macon area and along the I-75/Riverside Drive corridor from Tom Hill Sr. Drive/Arkwright Road and I-75 interchange up to the Bass Road and I-75 interchange, and has transformed these areas into major employment centers in Macon-Bibb County. As previously mentioned, fixed routes have been in place since before 1960, when the population of Macon-Bibb was more focused in the urban core areas. According to the current route plan, no other public transportation routes have been established for these new population and employment centers. Those who rely on public transportation are limited in where they can seek housing and employment due to limited access. The lack of routes to these areas reduce housing and employment opportunities for members of certain populations that do not have private transportation.

Public Housing Authorities- Tenant/Voucher Selection Process

Macon Housing Authority

The primary provider of rental housing for persons of low to moderate-income in Macon-Bibb County is the Macon Housing Authority (MHA). MHA operates 1,298 low-rent housing units. MHA also administers the Section 8 program, which allows persons of low to moderate-incomes to reside in privately owned residential structures by subsidizing a portion of the rental cost. These residential structures range from apartments to traditionally built stick homes. There are 3,062 units that are funded through Section 8 throughout Macon-Bibb County.

Public Housing

Conventional public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Assisted housing comes in all types ranging from scattered single family houses to high-rise apartments. The Macon Housing Authority owns and manages 1,298 public housing units, ranging in size from efficiencies (0-bedrooms with living area, kitchen, and bath) to 5-bedroom units.

In addition to other HUD requirements, unit assignments are based on family composition. MHA determines eligibility and rents based on:

1. Annual gross income for all members of the household;
2. Whether you qualify as elderly, a person with a disability, or as a family; and
3. U.S. citizenship or eligible immigration status.

If a family is eligible, MHA will check references to ensure that the family will be a good tenant. The Authority will deny admission to any applicant whose habits and practices may be expected to have a detrimental effect on other tenants or on the community's environment.

Intake and Selection Process: Once an application is received, it will be placed on a Waiting List. The Waiting List is a complex database containing up to 2,500 application files and sorted by Bedroom Size, Preference, Date, and Time.

- Bedroom Size is determined by the number of adults and children on the application along with the sex of each child.

Preference: A preference may be claimed by an applicant at the time of application. MHA currently has five preferences that are explained in the Preference Guidelines below:

- **First Preference**
Head of household or Spouse is elderly (62 or older) or disabled and is currently receiving Social Security or Supplemental Security Income (SSI) benefits.
- **Second Preference**
Head of household or Spouse is working at least 15 hours per week for a minimum of 120 days.

- **Third Preference**

Head of household or Spouse is receiving other retirement or disability benefits (e.g. Pensions, VA benefits, Worker's compensation, FMLA benefits, Annuities, RR Retirement, Civil service pensions, etc.)

- **Fourth Preference**

Head of household or spouse is receiving other income (e.g. TANF, Child Support, Alimony, Regular contributions or gifts, Unemployment Benefits, SSI/SSA benefits for children in the household, or working less than 120 days.

- **No Preference**

All other families

Homeless Priority: Within each of the five preference categories listed above, preference is given to Applicant families, otherwise eligible, who meet the definition of homeless. "Homeless" is defined as any individual or family who:

- Lacks a fixed, regular and adequate nighttime residence, or
- Is living in a homeless shelter (or other temporary housing provided by an agency serving the homeless) at the time of application as well as at the time of selection. The applicant must be living in a homeless shelter (or other temporary housing shelter provided by an agency serving the homeless) that is controlled in whole by an agency that has a current Memorandum of Understanding on file with the Macon Housing Authority. An applicant family must also be referred by such agency. Referrals in this regard must be accompanied by an official certification by the referring agency as to the homeless status of the applicant.

An applicant family, who qualifies for the homeless priority will receive only one offer for a public housing unit. If this offer is refused, the homeless priority is void, and the applicant will be ranked in the preference category for which they qualify.

Section 8 Voucher Program

The Housing Choice Voucher program, commonly referred to as Section 8, is the largest affordable housing program funded by the U.S. Department of Housing and Urban Development (HUD). Macon Housing Authority administers the Section 8 program throughout Macon-Bibb County.

The Section 8 program provides rental assistance payments on behalf of low-income individuals and families, including the elderly and persons with disabilities, for decent, safe, and sanitary housing. In general, the tenant pays 30% of their adjusted family income for rent and utilities. The Housing Authority pays the difference between the unit's contract rent and the family's portion of rent directly to the property owner. Some Section 8 programs offer slight variations in the manner by which the family's portion of rent is calculated.

Tenant Selection Process

To assure housing that meets their needs, the qualified household searches for a rental unit in the private market with a landlord willing to accept the voucher. The participant is free to choose any housing that meets the program requirements and is not limited to units in subsidized housing areas. Once they find a unit, MHA will inspect it to ensure that it meets HUD's Housing Quality Standards (HQS). When the unit meets HQS and the rent is deemed appropriate for comparable rents for that size unit, the family and the landlord sign a lease.

When the family moves into the home, the landlord and MHA sign a Housing Assistance Payments (HAP) Contract. MHA pays the subsidy directly to the landlord on behalf of the participating family. The family is responsible for paying any MHA determined rent share directly to the landlord.

Property Tax Policies

Real estate property taxes are not direct impediments to Fair Housing choice, but taxes do impact housing affordability and influence households housing choices. Tax increases as a result of millage rate changes or higher property assessments may be burdensome to low-income homeowners; and tax increases are often passed on to renters through monthly rent costs. Since property taxes are levied without regard to a family's income, property taxes for lower-income families constitute a large share of their income than for higher-income families, making them regressive taxes. Tax forgiveness or other tax relief policies can help lower-income homeowners. Such policies can be part of an overall, much larger strategy to promote Fair Housing because they help to preserve homeownership opportunities for groups like minority families, elderly homeowners, low-income households, persons with disabilities, who otherwise would have only rental options. Additionally, some tax policies provide relief to eligible renters.

Real estate taxes are levied on land and buildings and provide primary revenue streams for counties, municipalities, and school districts throughout Macon-Bibb County. The Board of Assessors establishes the market value of each property and then apply a pre-determined ratio to establish a property's assessed value. The taxable value is then assessed in proportion to that value. Property tax assessment discrimination occurs when lower valued properties (such as those in impoverished neighborhoods) are assessed at a higher percentage of market value than other properties in the jurisdiction.

Summary of Findings

The assessed valuation for residential property in Macon-Bibb County is set at 40% of the market value. This means that taxes on all residential properties will be calculated on a value that is 40% of the properties fair market value. As described above, the property's location within the community greatly influences its fair market value, and therefore, the actual dollars paid in real estate taxes. In Macon-Bibb County, this is applicable to both single and multi-family dwellings. Additionally, relief can be sought in the form of exemptions according to specific classifications as outlined by the Macon-Bibb County Board of Assessors. In general, the "across the board" tax assessment utilized by the consolidated government does not directly discriminate against any property owner.

Private Sector: Lending Policies and Practices

Discrimination in mortgage lending is prohibited by the Fair Housing Act. HUD lists an example of five activities that could be seen as potential discrimination in mortgage lending if based on race, color, national origin, religion, sex, familial status, or handicap/disability. These include:

1. Refusal to make a mortgage loan
2. Refusal to provide information regarding loans
3. Imposing different terms or conditions on a loan, such as different interest rates, points or fees
4. Discrimination in appraising property

5. Refusal to purchase a loan or set different terms or conditions for purchasing a loan

Analysis of Home Mortgage Disclosure Act (HMDA) Data

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 requiring lending institutions to report public loan information. For the analysis of private sector lending practices, the 2013 HMDA data (most current data set) was used in conjunction with the 2010 Census and Federal Finance Institutions Examination Council (FFIEC) data. HMDA data on loan activity are reported to document home purchases, refinancing and home improvement loans. All three types have been included in the total number of loans applied for within Macon-Bibb County.

The HMDA data provide insight into the numbers of loans applied for, originated, and denied by race and ethnicity, though these figures are available only at the MSA level. Thus, a direct comparison or analysis of loan approvals and denials by census tract in Macon-Bibb County is not possible. However, the figures are useful for examining trends in the larger market, and assessing the general trends in Macon-Bibb County.

Because not all institutions are required to file under HMDA, mortgage lending coverage for any one neighborhood may be incomplete. Coverage is particularly limited for non-metropolitan and low-homeownership areas. Although HMDA data can provide valuable information for these areas, users should be cautious in drawing conclusions on the basis of HMDA data alone.

Lending Activity

In 2013, there were a total of 7,054 loan applications submitted by residents of Macon-Bibb County. Of those, nearly 66% were loans to refinance and 25% for home purchases. The remaining 9% were loans to make home improvements. Conventional loans accounted for a little more than 14% of the total loans applied for in Macon-Bibb County. The breakdown of the total loan types and dispositions can be seen in the figure below. As these figures show, while the majority of conventional home purchase loans were approved, about 23% were denied. Only a modest number of loans were approved but not accepted, indicating the potential buyer's failure to close on the chosen property or a reassessment of the situation.

Figure 27: Loans Applications for Macon Bibb County, 2013

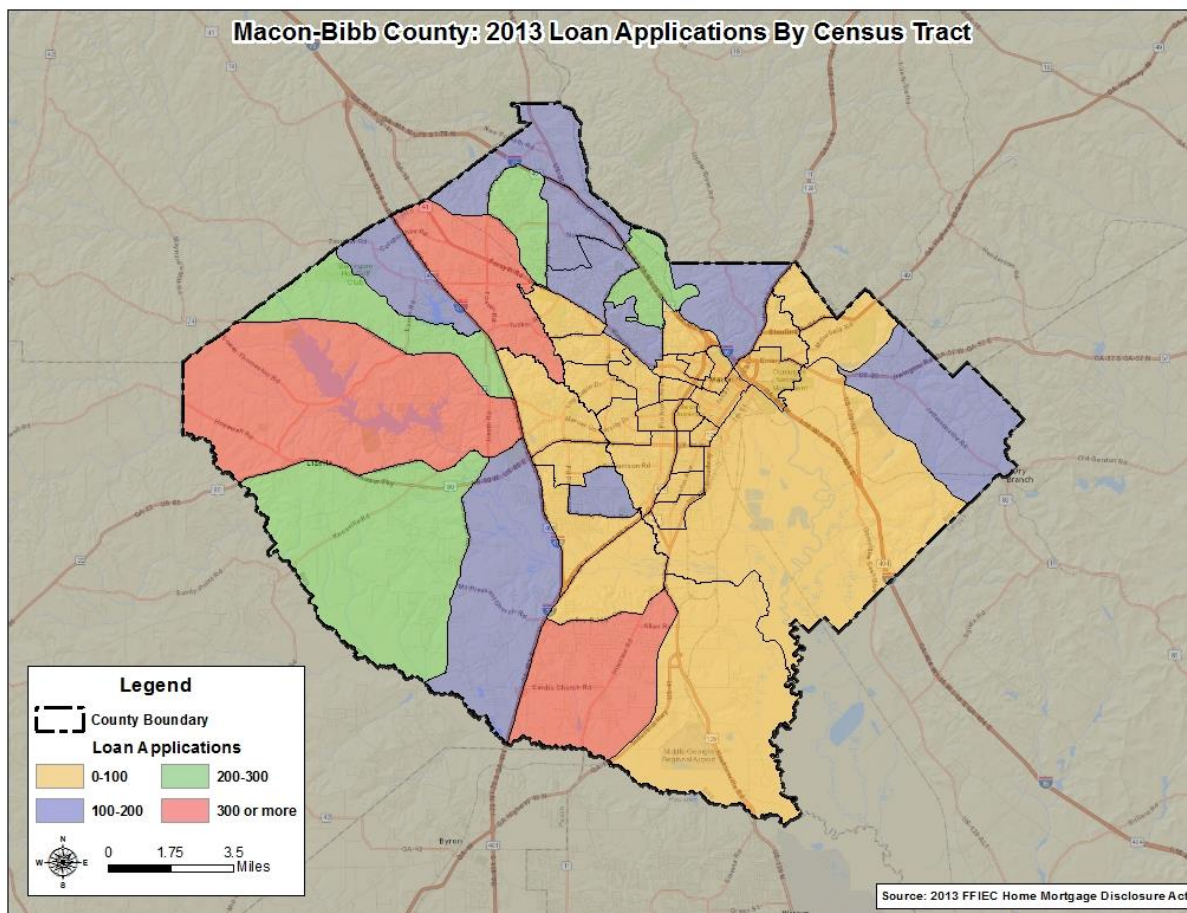
Disposition	FHA/VA (Purchase)	% of Apps	Conventional (Purchases)	% of Apps	Refinances	%of Apps	Home Improvement	% of Apps
Total Originated	505	65.6%	645	60.7%	2780	55.6%	247	36.6%
Approved, Not accepted	31	4%	69	6.5%	261	5.3%	16	2.4%
Denied	148	19.2%	245	23.2%	1165	23.2%	398	59.1%
Apps Withdrawn	76	9.9%	83	7.8%	558	11.2%	10	1.5%
incomplete	10	1.3%	19	1.8%	235	4.7%	3	0.4%
Total Applications	770		1061		4999		674	

Source: Home Mortgage Disclosure Act (HMDA), 2013

An important variable in dissecting lending outcomes is the percentage of withdrawn or incomplete loan applications. An understanding of the home buying and loan processes, income/equity requirements, and financial responsibility are important to a successful loan application and home purchase. Many households, particularly those entering the homeownership market the first time, lack financial knowledge to deal with the home buying process and may end up closing or withdrawing their application. A high rate of withdrawn or

closed applications can be indicative of a lack of knowledge of the loan application and/or home buying process, or a lack of adequate assistance by the lender throughout the process. The lack of lender assistance may or may not be discriminatory in motive or outcome. However, HMDA data are inadequate in proving motive. In any event, the percentage of withdrawn or incomplete applications in Macon-Bibb County was relatively low. The map below details the applications received by census tract for the year 2013.

Figure 28: Loan Applications by Census Tract, 2013



Lending by Race

The HMDA data provide insight into the numbers of loans applied for, originated, and denied by race and ethnicity. Thus, a direct comparison or analysis of loan approvals and denials by census tract in Macon-Bibb County is not possible. However, the figures are useful for examining trends in the larger market, and assessing the general trends in Albany. White loan applicants constituted the majority (56.4%) of loan applications for the period, with African American applicants second at 29.5%. The loan denial rate was highest for African Americans (32.1%), followed by Joint racial applications (25.0%), and American Indians (22.2%). Whites had the lowest loan denial rate and a rate of withdrawn or incomplete applications that was low to moderate relative to the other groups and the number of applications involved. The table below provides the complete set of data and calculations for loan dispositions in Macon-Bibb for the year 2013.

Table 29: Loan Dispositions by Race and Ethnicity

Loan Dispositions By Race and Ethnicity						
Race	# Loan Applications	# Loans Originated	# Applications Denied	Loan Denial Rate	Withdrawn, Not Accepted, Closed or Incomplete Loans	Withdrawn, not accepted, closed or incomplete %
AMERICAN INDIAN/ALASKA NATIVE	23	8	7	30%	8	34.7%
ASIAN	88	55	20	23%	13	14.7%
BLACK OR AFRICAN AMERICAN	1681	722	664	40%	295	17.5%
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	12	6	4	33.3%	2	16.6%
WHITE	4842	2953	997	21%	892	18.4%
2 OR MORE MINORITY RACES	5	0	3	60%	2	40%
JOINT (WHITE/MINORITY RACE)	56	34	14	25%	8	14.2%
RACE NOT AVAILABLE	797	399	247	31%	151	18.9%
Ethnicity						
HISPANIC or LATINO (TOTAL)	93	37	33	35.5%	29	31.1%
NOT HISPANIC OR LATINO	6608	3746	1665	25.19%	1197	18.1%
JOINT HISPANIC or LATINO	31	15	10	32.2%	6	19.4%
ETHNICITY NOT AVAILABLE	772	379	248	32.1%	145	18.8%

Source: Home Mortgage Disclosure Act, 2013

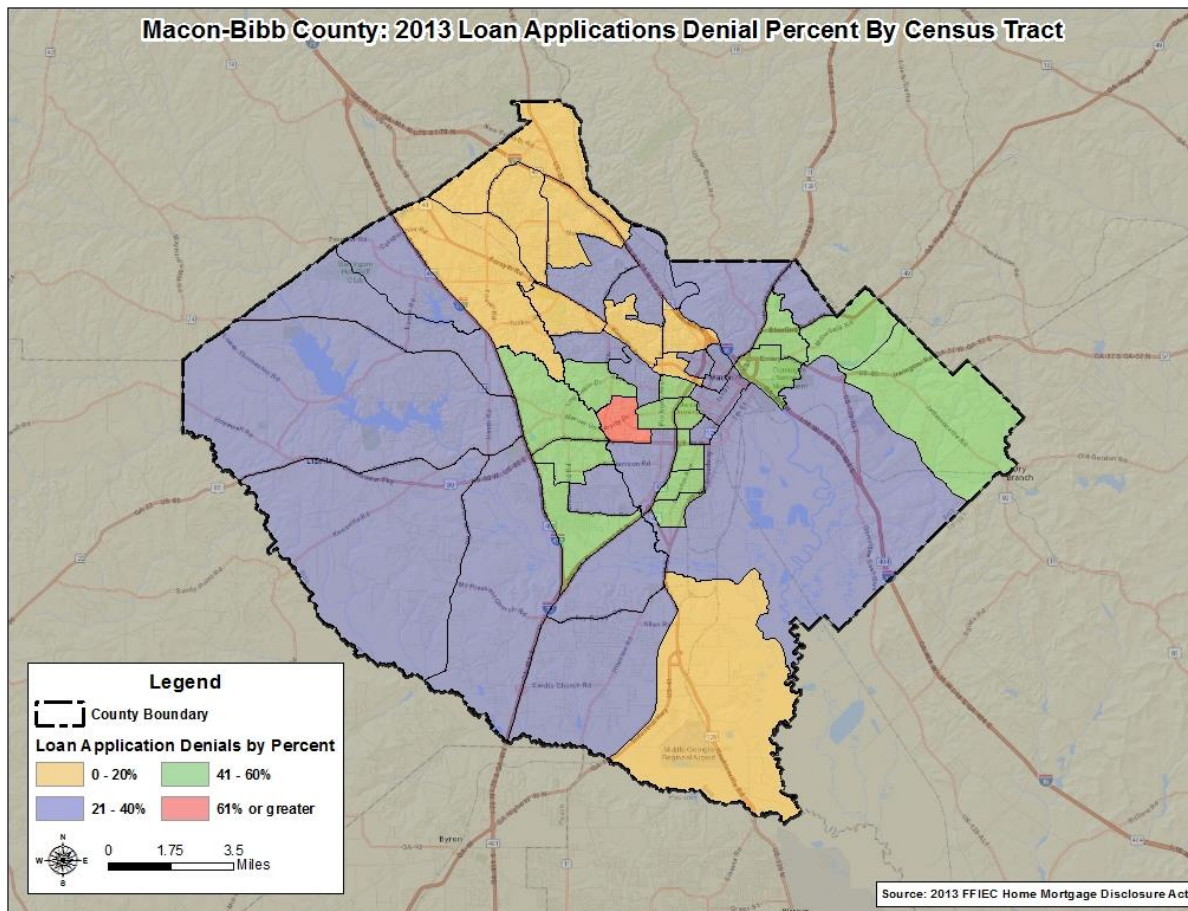
Loan Denial by Census Block

The map below shows the percentage of denials by Census Tract in Macon and Bibb County. It would be expected that the greatest percentage of denials would be from applications deriving from the low- to moderate-income Census Tracts. Residents in these areas are more likely to have greater debt, less collateral, and poorer credit history. However, these generalizations may not be accurate assumptions.

In evaluating the data, it is evident that the areas with at least 40% denial rates are in a low income area. However, in comparing this map with the total loan applications in figure 29, these areas also had the lowest number of applications derived; therefore, a greater denial rate than those areas that generated more

applications in Macon-Bibb County. For example, the census tract shaded red in the middle of the map had denial rate of 75% derived from only 75 applications. From this information it is not clear that an act of Fair Housing discrimination is occurring because higher denial rates are not concentrated solely within low-income and minority Census Tracts.

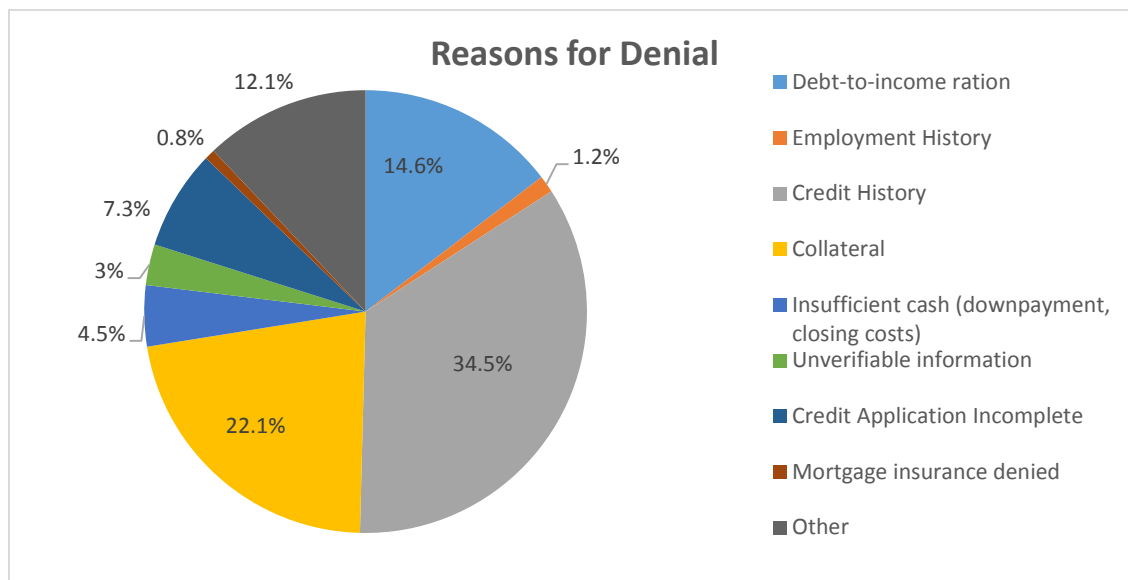
Figure 30: Loan Applications Denial by Census Tract



Reasons for Denial

HMDA data also shows the reasons for denial by race and ethnicity. The table below shows that among all races, credit history was the reason for the greatest number of denials, followed by debt/income ratio and then collateral. There is no clear trend in denials when examining the table by race or ethnicity. However, African Americans had the greatest number of denials and the percentage of denials based on credit history with a rate of almost 40%. Denial based on debt/income ratio was somewhat higher than the rate for Whites. The Race unavailable group also had high rates of denial on the same basis. The chart on the following page shows a breakdown in the reasons for denial.

Figure 31: Reasons for Denial



Source: Home Mortgage Disclosure Act (HMDA)

Summary of Findings

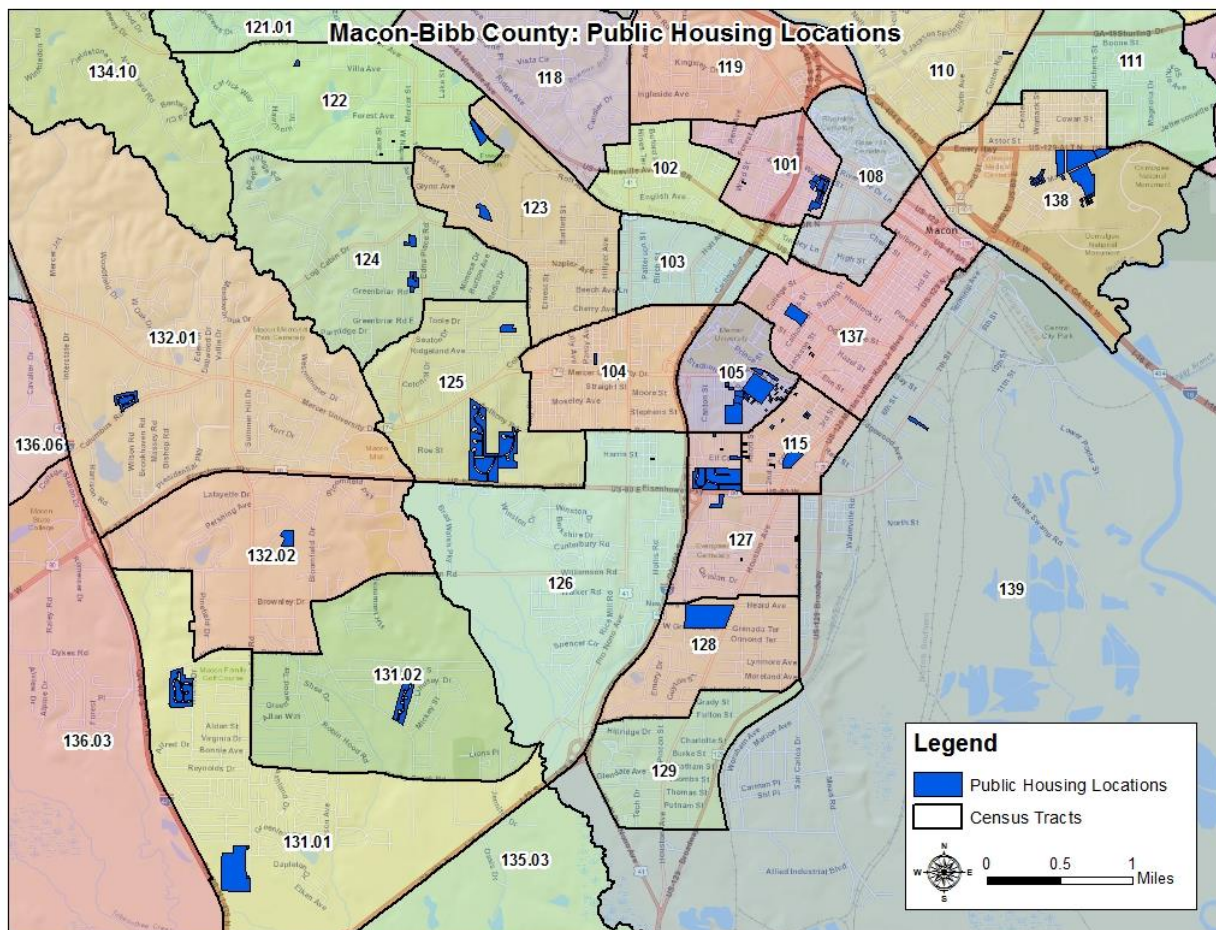
A key aspect of Fair Housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the current housing and economic crisis. Lending practices of financial institutions and the access to financing for all households, particularly minority households and those with lower incomes can be examined by reviewing the Home Mortgage Disclosure Act [HMDA] data. Lending patterns in low and moderate income neighborhoods and areas of minority concentration can also be examined through this data. However, public data on lending does not contain detailed information to make conclusive statements of discrimination, but can only point out potential areas of concerns. Furthermore, except for outreach and education efforts, local jurisdictions' ability to influence lending practices is limited. To determine if lending could be considered an impediment to Fair Housing choice, the reasons for denial must be a known factor. Based on current HMDA data, it is unclear if these minority applicants were denied for valid economic reasons. Such a determination could only be made with further research, to include testing of the mortgage lending and underwriting practices in Macon-Bibb County. Further, regular HMDA data monitoring will need to be conducted in order to detect any lending discrimination practices used in the housing industry in Macon-Bibb County. These activities can include annual review of HMDA data and conducting Fair Housing audits to determine the extent of discriminatory lending practices (if any).

Public and Private Sector Policies

Affordable Housing Supply

The Macon Housing Authority (MHA) currently operates eight family living sites, one senior living site, and six mini-neighborhoods. There are approximately 2,100 units divided amongst the 15 sites, and in total there are 2,982 units of public housing according to the MHA. The map below and preceding chart displays the location, name and number of units for Section 8 project-based and other multifamily HUD-assisted properties. The average number of units per property for affordable rentals in Bibb County is 72.70. The largest federally assisted affordable rental community in the county is Saint Paul Apartments at 215 units and the smallest is Marc Resources III at 4 unit(s). Nine apartment properties provide housing for seniors containing 442 units. Of the 2,982 units, 4,193 units include some form of rental assistance (like Section 8) to make rent more affordable for very low-income families.

Figure 33: Macon-Bibb County Public Housing Locations



Public Housing Properties		
Family Living	Senior Living	Mini Neighborhoods**
- Anthony Homes*	- McAfee Towers*	- Maple Court, Berkner Avenue, Gledhillt Street, Poppy Avenue, Water Oak Court, Walker Street
- Bowden Homes*		- Willingham Court
- Davis Homes		- Roff Avenue, Markwalter Street
- Mounts Homes		- Bloomfield Way
- Murphey Homes		- Shakespeare and Bobby Jones Homes
- Pendleton Homes*		- Martin Place
-Tindall Heights		

*Converted to PBRA program

**Mini Neighborhoods have properties located on the listed roads.

Summary of Findings

Because the demand for public housing and Section 8 vouchers is so great, the Macon Housing Authority is limited in the amount of requests it can process at one time. In 2014, MHA opened up a waiting list for vouchers for the first time in six years. During a five-day period, over 2,500 residents completed applications for assistance. This volume caused the waiting list to close for an indefinite amount of time as MHA works to process the applications. This lack of affordable housing supply to meet the number of applications is a possible impediment to Fair Housing choice as those who cannot utilize the voucher system are limited in their housing options.

As noted above, Anthony Homes, McAfee Towers, Bowden Homes and Pendleton Homes all switched over to the Section 8 platform to Project Based Rental Assistance (PBRA) program. Under the PBRA, the subsidies for residents come directly from HUD and not from the Macon Housing Authority. Because the properties are not related to the voucher program, the conversion does not impact MHA's voucher program. As a result of the conversion however, the MHA is seeking to leverage nearly \$7 million dollars in new upgrades to these facilities.

Fair Housing Enforcement

Macon-Bibb County's Economic and Community Development Department (ECDD) is responsible for furthering economic growth by "strengthening neighborhoods, building partnerships, and fostering public and private investments in the community." One of the ECDD's prime responsibilities includes furthering Fair Housing through the disbursement of funds and regulatory compliance. The department is the depository for all Fair Housing complaints within Macon-Bibb County. ECDD has written procedures outlining intake procedures in handling the calls and determining if the complaint is a legitimate Fair Housing complaint. If the complaint seems to pertain to a code enforcement issue, the complaint is referred to Business Development Services for investigation.

Once a Fair Housing complaint has been made and heard by ECDD, the complainant is referred to HomeFirst, a homeowner education and resource center in Macon-Bibb County, and also to HUD.

The following describes the written intake procedures addressing a Fair Housing complaint for ECDD:

INTAKE PROCEDURES

- I. Receipt of complaint from complaining party
 - a. Walk-in or by telephone
 - b. Determination of the nature of the complaint/assign referral agency
- II. Completion of Intake Form
 - a. Supporting documents
- III. Logging, filing, and docking of file (within 14 days)
 - a. Assign case number I. Year-Agency Code-Consecutive Number i.e. [98-01-0005]
 - b. Copy intake form and develop a file (inclusive of an “Activity Log”)
 - c. Enter information into log sheet
- IV. Referral of case package to the corresponding agency
 - a. With cover letter (briefly describing the complaint), intake form and supporting documentation.
 - b. Landlord/Tenant issues will be referred to Georgia Legal Service
 - c. Complaints filed under other status will be referred to GCEO (Georgia Commission on Equal Opportunity) – dual filed to HUD.
 - d. Title VI, Section 504, Section 109 and Zoning law issues will be referred directly to HUD.
- V. Follow-up letter to complainant of claim referral to relevant agency.
- VI. Maintain communication with GCEO, and verify dual filing with HUD.

GENERAL MATTERS REGARDING INTAKE

1. After the intake of the complaint, a letter will be forwarded to the potential complainant; informing them of the agency assigned to their case, along with a contact name. In efforts to further safeguard individuals from discrimination, ECDD’s Fair Housing staff must direct all questions/concerns regarding a claim to the investigating agency. Legal stipulations prevent us from counseling or advising either party involved in a referred Fair Housing claim.
2. Upon notification that the investigating agency has received ECDD’s referral, the Fair Housing staff will complete the follow-up process. The steps of the intake process are time sensitive and should be completed in a timely manner. In situations when it is necessary to depart from the established time frames, every effort should be made to expedite the process.
3. In accordance with HUD recommendations, the case file information must be accurate and complete. The intake process must be conducted in a professional environment; with confidentiality and efficiency.

4. Zoning law issues will be referred to HUD.
5. The potential complainant will be informed that they have one (1) year from the date of harm, to file a complaint.
6. In the case of disability complaints, the potential complainant will need to submit a doctor's statement. The complainant should have within its possession, documentation of a disability, which falls within the jurisdiction of the Act, as well as source of income such as supplemental security income and/or social security. The medical statement is to be attached to the referral information as supporting documentation.

HomeFirst

HomeFirst is a non-profit agency established in 2002 to provide local residents with homebuyer education services and programs to residents in Macon-Bibb County. The organization is funded by the U.S. Department of Housing and Urban Development's Community Development Block Grant Program, which is appropriated through the Macon-Bibb County Economic & Community Development Department. Through this relationship, HomeFirst is able to obtain support from other local, state and federal organizations committed to making homeownership affordable.

HomeFirst provides homebuyer education and counseling programs to help families make the transition to homeownership. In addition, the agency also provides free one-on-one confidential counseling to help clients who may have credit issues that need to be resolved prior to qualifying for a mortgage. Professionally certified housing counselors are trained to assist clients who may have difficulty understanding the terms and conditions of their loan documents and in understanding what rights they have when going through the process.

One of the major functions of HomeFirst is working to resolve Fair Housing complaints before they are formally filed with the Department of Housing and Urban Development and/or ECDD. When a complaint is filed with HomeFirst, a counseling is scheduled to determine whether the complaint meets the criteria of discrimination. According to Reginald Bell, the center's executive director, a majority of the complaints received are discovered to be due to tenant-lease issues rather than cases of discrimination. Often times, tenants are not aware of the process used to facilitate repairs or service to units, and will file a discrimination claim due to a landlord's lack of action. When these situations are identified, HomeFirst works with both parties to discuss the legal provisions set forth in the lease to work out a mutually beneficial agreement to resolve these issues. If a complaint is substantiated, HomeFirst refers the complaint to HUD for resolution.

Summary of Findings

Although the Macon-Bibb County ECDD is designated as the responsible party for Fair Housing complaints, it was discovered through interviews with various stakeholders that there are other agencies available to address complaints. HomeFirst and the Macon Housing Authority also collect and refer Fair Housing complaints to HUD. During interviews regarding the process of making a complaint or who kept record of the information, it was unclear who was responsible for keeping record of all complaints made. While not exclusively an impediment to Fair Housing, the streamlined collection of information regarding complaints is essential to ensuring that Fair Housing complaints are addressed.

Informational Programs

The need to improve informational programs was noted in both the 2003 and 2010 Analysis of impediments. To address this, approximately \$52,000 was used to fund Fair Housing-related and homebuyer education activities during 2013. The following is a summation of the actions taken to address Fair Housing by ECDD in that year:

- Fair Housing Notices were made on Public Service Announcements (PSA) on TV and radio on a monthly basis. The PSAs were also advertised in the Macon Telegraph (the legal organ,) Georgia Informer (a minority paper) and the Macon Black Pages.
- Provided brochures and information on how to determine Fair Housing issues and the contact information to file a complaint. These brochures are available at various housing agencies throughout Macon-Bibb County.
- HomeFirst conducted five homebuyer education classes during 2013. Each class included a session that focused exclusively on Fair Housing. During each session, participants were informed on the Fair Housing Act, what housing is covered, what is prohibited, and what to do if one feels that they have had their rights violated, and how to file a complaint.

Fair Housing Month in Macon-Bibb

April has been dedicated as Fair Housing Month in the Macon-Bibb County. Events promoting Fair Housing include guest speakers and presentation regarding Fair Housing on the local government Channel 14. Also, HomeFirst partners with the Macon Alumni Chapters of Delta Sigma Theta Sorority, Inc. and Phi Beta Sigma Fraternity, Inc. to host a free Homebuyer's Class on the last Saturday of the month. This all day event focuses on many different aspects of homeownership including pre-purchase counseling, credit restoration, and foreclosure prevention. Fair Housing is a topic of discussion during an afternoon session. This event was advertised in the *Georgia Informer*, a local newspaper generally attracting minority readership. Executive Director of HomeFirst, Reginald Bell, stated in the article "the purpose of the class is to bring together all interested parties to talk about how to navigate the homebuyer process."

Summary of Findings

In addition to the information provided by various stakeholders regarding informational programs offered by public sector housing organizations, it must also be noted that information regarding Fair Housing was displayed in a number of large real estate offices and rental agencies during visits throughout the study period. Macon-Bibb County has realized that the availability of information regarding Fair Housing is essential to educating residents and ensuring Fair Housing practices are being followed. It was expressed in the interview with HomeFirst, that though ample educational opportunities were available, many tenants lack training on their rights regarding leasing. Additionally, some landlords had not been formally trained in their responsibilities regarding Fair Housing. This lack of knowledge presents an opportunity for Fair Housing to occur, if the parties do not have a fundamental knowledge to notice discrimination if it should occur. While the data indicates a limited number of

complaints, Macon-Bibb County must continue to address educational efforts to ensure that residents are staying informed on policies and practices that may impact their housing options.

Section V. ASSESSMENT OF CURRENT PROGRAMS

Macon-Bibb County's Economic and Community Development Department administers several federal, state and local funding sources for the benefit of Fair Housing. Priorities for these funds are outlined in the Program Year Action Plan, submitted by Macon-Bibb County to HUD annually. The following summarizes program accomplishments for Macon-Bibb County as indicated in the 2013 CAPER.

Current Programs

Community Development Block Grant (CDBG): Macon-Bibb County's Economic and Community Development Department administers the Community Development Block Grant Program. Macon-Bibb County receives the funds as part of its entitlement from the United States Department of Housing and Urban Development (HUD), and the grant finances public service agencies as well as home improvement programs for homeowners and landlords.

HOME Investment Partnerships (HOME): Macon-Bibb County used HOME funds to help increase the number of homebuyers through the Homebuyer Program. Local nonprofit housing agencies received most of the funds for use in providing down-payment assistance, second mortgage financing, and construction gap financing for developers.

Program Income: Macon-Bibb County received approximately \$300,000 in program income from previous program activities such as the revolving loan program, rents, and other activities. The City reused the income by helping low-income persons with decent, safe, and affordable housing or public service activities designed to improve the quality of life for eligible persons. Program income is not designated for specific projects but considered as a part of the total funding for the proposed projects.

Neighborhood Stabilization Funds (DCA): Macon-Bibb County's Economic and Community Development Department administered the Neighborhood Stabilization Funds. In 2013, The City in partnership with Bibb County applied and received \$4.1 million NSP funds through to the Georgia Department of Community Affairs program. These funds have been obligated.

Homeless Prevention funds (Recovery Act): The Economic and Community Development Department administers the Homeless Prevention Program. The City received Homeless Prevention Funds as a part of the American Recovery and Reinvestment Act of 2009, these funds allowed Macon-Bibb County to provide financial assistance and services to prevent individuals and families from becoming homeless and help those who are experiencing homelessness to be quickly re-housed and stabilized.

Comprehensive Grant Program (CGP): The CGP was established to provide Public Housing Authorities with 250 or more units, greater discretion in the planning and implementation of modernization activities. CGP uses a formula process, rather than a competitive process, for allocating modernization funds. HUD distributes funds to PHAs annually based on a formula that estimates the backlog and accrual needs of the developments in a PHA. According to the Macon Housing Authority's FY 2009 Action Plan, the MHA's annual contribution for Section 8 Tenant-Based Assistance is \$14,963,425 for the program year.

McKinney-Vento Homeless Assistance Programs: Macon-Bibb County is a part of the Georgia Balance of States Continuum of Care that is administered by the Georgia Department of Community Affairs (DCA). Each year local agencies apply directly to DCA for supportive housing funds to assist homeless and those in jeopardy of becoming homeless. Forms of assistance can include funds for permanent and transitional housing, homeless services and operations, technical assistance, HOPWA, an HMIS System as well as Shelter plus Care Match. In July of 2009, agencies in the Macon-Bibb County received a total of \$563,800.

HOPE VI, Tax Credit Projects: During this year both River Edge Behavioral Health, Inc. and Infill Housing applied for Tax Credit projects through the Georgia Department of Community Affairs NSP Flex Pool round of funding and were awarded.

General Fund Contributions: Macon-Bibb County provides general funds for the Property Inspection Program and to provide the local match that is required when using HOME funds. Macon-Bibb County also provides funds to be used for neighborhood revitalization projects.

During program year 2013, Macon-Bibb County continued to address the needs of its citizens based on the priorities, needs, goals, and specific objectives listed in the 2010 Consolidated Plan. Despite recent economic downturns, ECDD has achieved a measure of success toward meeting the high priority of neighborhood stabilization/revitalization through the provision of safe, decent, and affordable housing. However, the nationwide slump in housing sales has also affected our local area. Marketing the homes in this current market is a difficult challenge, but ECDD is continuing to refer prospective buyers to the housing partners through the Macon Neighborhood Challenge Program. Through this partnership, ECDD helps low- to moderate-income individuals, who may not be able to obtain a loan without assistance for various reasons, move into homeownership. In an effort to further assist low-income individuals during these tough economic times, the program has been revamped in an effort to attract and/or assist more low- and moderate-income homeowners. The program is now a partial grant and partial loan. The interest rate for the Home Purchase Program (HPP) and the Home Improvement Program (HIP) was revised to 2% in 2008 in an effort to assist more low- and moderate-income individuals become homeowners and enable current homeowners to make necessary repairs to avoid a further decline in the local housing stock. In the past, ECDD focused its revitalization efforts in the following low- and moderate-income areas: Beall's Hill, East Macon, Unionville, Prince Street/Nussbaum Avenue, Tindall Heights and Lynmore Estates. Additional areas are changing as opportunities are identified.

Section VI: CONCLUSIONS AND RECOMMENDATIONS

While Macon-Bibb County is making great strides towards achieving Fair Housing Choice for its residents, there are still impediments in place and areas of concern that warrant additional action in order to be fully resolved. This analysis is an attempt to identify major obstacles to Fair Housing access in Macon-Bibb County as well as propose viable recommendations to address these impediments.

Current Impediments

The Middle Georgia Regional Commission has developed the following list of impediments to Fair Housing in Macon-Bibb County. It must be noted that some of the same impediments have been identified in previous studies, therefore further action must be taken to ensure that they do not perpetuate discrimination currently or in the future. Though the list of impediments shown below are not exhaustive, they represent the most visible challenges to Macon-Bibb County.

Zoning and Land Use:

- **Impediment 1: Zoning Restrictions**

As noted in previous analyses of impediments, the clustering of restricted residential zones due to lot requirements and conditional permitting can create areas only affordable to upper-income households, thereby limiting housing choices. There is also discrepancy in the language used between the Macon-Bibb County Land Development Resolution and the Code of Ordinances. Finally, the definition of “family” is only referenced by the County’s Ordinances. The definition of tenant only applies to farm labor.

Recommendation #1a: It is recommended that Macon-Bibb County continue to review and clarify the language between both documents to ensure consistency between both documents. A broader definition of “family” and “tenant” is recommended to alleviate discrimination against certain groups of residents.

Recommendation #1b: Zoning and building requirements should be periodically reviewed to ensure that growth plans for Macon-Bibb County are consistent and fair with respect to diversity of communities and equal opportunity for all residents.

Infrastructure:

- **Impediment 2: While currently serving the areas of greatest need, *concentrated and restricted public transportation routes limit mobility outside of the former city limits. This reduces opportunities for protected populations, thereby limiting housing choices.***

Recommendation #2a: It is recommended that Macon-Bibb County explore opportunities and utilize resources to increase routes to rural parts of the county. MBC should review and update

its Long Range Transportation Plan to reflect the needs for additional routes and make attempts to allocate or solicit funding to diversify its transportation offerings.

- ***Impediment 3: Housing demand exceeds available supply and resources to locate residents into affordable options.***

Recommendation #3a: Macon-Bibb Economic and Community Development Department (ECDD) should continue to work with both public and private housing partners to fund both rehabilitation projects and new low-cost developments to create an adequate Fair Housing supply. Concurrently, ECDD should seek to maximize economic opportunities to provide residents with quality of life and furthering of their housing options.

Enforcement

- ***Impediment 4: Fair Housing Education and Enforcement***

There is no designated entity or process utilized consistently to receive, investigate, and refer Fair Housing complaints, as there is currently no standard recordkeeping procedure. Additionally, it was identified that though educational opportunities were available, there are opportunities for improvement.

Recommendation #4a: Designate one agency to collect and refer fair housing information and complaints. Develop a process for which all participating agencies can submit this information to ensure accurate data is collected regarding Fair Housing.

Recommendation #4b: Macon-Bibb County should continue to utilize and expand Fair Housing education and awareness campaigns to the public. Additionally, Fair Housing education for potential landlords and developers should be implemented into business licensing requirements to insure that all parties are being informed of Fair Housing laws before they do business in Macon-Bibb County.

Conclusion

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