

## “2020 Draft Analysis of Impediments to Fair Housing”

Public Comments by Melanie & David Couchman, February 17, 2020 (REVISED March 6, 2020)

We feel that the “2020 Draft Analysis of Impediments (AI) to Fair Housing” presented to the City Council in its December 5, 2019 meeting does not accurately assess the city’s current situation. To be clear the CDBG program is to ***“assist cities with developing viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for LOW- AND MODERATE-INCOME persons.***

The report: does not present all the facts, draws the wrong conclusion from some of the facts; and, outlines few actions to correct the problems.

### **What is NOT said in the AI report: Inconsistencies between the AI and facts**

The AI report minimizes the impact that gentrification is having on the city’s socio-economic and racial diversity. It seems that the city is following the same pattern as others in the northern suburbs of Atlanta: Roswell, Marietta, Smyrna, Brookhaven, Dunwoody as well as Sandy Springs. This pattern is documented in the study “The [“Demolition to displacement and race in Atlanta’s northern suburbs Oct 2018”](#) by Scott Markley, University of Georgia, published by Atlanta Studies.

To quote from the study:

*“In Sandy Springs, Brookhaven, Smyrna, and Roswell, ambitious redevelopment projects have transformed aging suburban neighborhoods into magnets for high-end real-estate investment and high-income homebuyers alike. But as local officials have touted these initiatives as the one-size-fits-all solution to economic decline, budget shortfalls, and crime, construction has frequently been made possible by razing older apartment complexes and displacing residents (see Map 1). Displacement can be devastating. It physically uproots people from their homes and communities, removing children from their schools and adults from their jobs, and it shatters the social relationships that constitute a place. Moreover, as apartment demolition forces thousands of renters to search for new places to live, it removes thousands of rental units from the market. Displacement via demolition simultaneously increases the demand and reduces the supply of housing, threatening its victims with homelessness while exacerbating the region’s affordable housing crisis. Attached is a copy of the report and, in addition, this is [THE LINK.](#)”*

**The city is acknowledging (page 5 of the AI report) only two older apartment communities being demolished. In fact, five have been demolished; and, the report does not mention socio-economic and racial impact. The city has lost almost 900 apartments with over 2,500 residents by allowing older apartments and shopping centers to be redeveloped. After reading Mr. Markley’s study, author of the above referenced study above, we requested more detail on the Sandy Springs apartments:**

Apartment Neighborhood	Area	Year	units	Residents	White	Black	Asian	Latino	Other
Versailles	Gateway	2014	172	597	50	88	5	440	14
Chastain	Gateway	2014	264	773	64	114	7	570	18
Avistele at Andalusia	Gateway	2016	308	855	158	153	41	478	25
Belle Isle	Gateway	2017	9	31	-	31	-	-	-
Provence North	City Springs	2015	112	333	60	59	11	198	5
Totals---->			865	2,589	332	445	64	1,686	62
# of people /apt			3.0	100%	13%	17%	2%	65%	2%
					100%	13%	87%		
					<b>Total</b>	<b>White</b>	<b>Non-White</b>		

As can be seen above, this displacement affected disproportionately the non-white populations; 87% being non-white.

This displacement also resulted in a major impact on our public schools. Our elementary school enrollment is down by 27%; a loss of over 1,100 kids where apartments were demolished, and rents were increased. Enrollment is down at Spalding Elementary by 41% and Dunwoody Springs by 34%.

The chart shows the impact on our school population

Sandy Springs Public Elementary Schools					
Elementary School	% decrease	Highest Enrollment	2019 Current Year	Student LOSS	Highest Year of enrollment
Spalding Elementary Charter	(41%)	649	380	(269)	2010
Dunwoody Springs Charter Elem	(34%)	814	541	(273)	2012
High Point Elementary	(23%)	868	665	(203)	2013
Lake Forrest Elementary	(22%)	985	766	(219)	2016
Ison Springs Elementary	(19%)	801	645	(156)	2012
<b>IMPACTED Elementary Schools</b>	<b>(27%)</b>	<b>4,117</b>	<b>2,997</b>	<b>(1,120)</b>	

The above facts do not support the city’s position in the AI report that it is monitoring the situation to “ensure that redevelopment does not deplete the City’s affordable housing stock and that the existing affordable stock is preserved and protected. (page 5)”. If the city is monitoring the situation, they need to be much more diligent in presenting the information in its true light.

The AI reports states that “75 percent of households in Sandy Springs could afford these units using income distribution data from the 2013-2017 Census” (page 4); concluding that “apartments offer the most accessible and affordable housing option” accommodating 75% of our rental residents.

It is difficult to assume that 75% of our residents can afford the rent in Sandy Springs. The recession of 2008 and the following economic recovery may distort using 5-year averages and estimates for basing assumptions. We do know that the ARC has estimated that rents have increased at almost 5 times the rate of family income in the Atlanta region (48% for rent and 10% for income). Sandy Springs is the second largest city in the region and, it would be reasonable to expect the same relations between rents and income. Thus, using estimates and averages may not be good data points when looking at short term analysis.

**Actions speak louder than words. Sometimes NO actions speak even louder!**

The AI report states that Sandy Springs has Public Housing that had been established by the Housing Authority of Fulton County (HAFC) prior to the city’s formation in 2005 (page 26). During this period HAFC has created housing for senior and low & moderate-income families. Including in this number are six apartment communities that reserved an average of 25+% of their units for low income families; a total of 600 units.

**ALL these communities have had their affordability units expire and now are completely market rate. In fact, one of the communities, Provence North, with 112 units was demolished and replaced with market rate apartment doubling the rent. As an example, this displacement forced families with 48**

**children in Spalding Elementary to move within the following 3 years. The school lost five professional staff and continues to lose students and staff as shown above.**

**Although the city acknowledges it “maintains an ongoing relationship with the HAFC” they have not taken any action to replace the units that are lost. In fact, the increased demand with reduced supply is causing rents to increase even further. Doing nothing is doing something.**

In addition, the City almost adopted an inclusionary zoning in the summer of 2017 that would have made provisions for developers to provide for minimum levels of affordability in new developments.

**They postponed action on it and discussed creating a Task Force which they referred to in the AI report. Comprehensive inclusionary zoning has yet to be incorporated by the city. The adoption of Development Code in 2017 affects very few development projects and will have a minimal impact since it is only for new development and the city acknowledges the shortage of available land for new development. Meanwhile many of the existing apartment communities have been “permitted” to be renovated without any requirements from the city for protecting the affordability of some of the units.**

### **Contradictions between the sentiments expressed in the AI versus actions.**

The AI report refers to the city’s Next Ten Comprehensive Plan. This plan is “the policy framework that articulates the direction of future strategic actions to be taken by Sandy Springs to preserve and enhance the city’s quality of life.” The sentiment expressed in the Next Ten is that it is designed to encourage mixed-income housing and preserve affordability for all.

In the AI report, the city states that they have incorporated provisions in the Next Ten Comprehensive plan for “workforce housing”.

**In actuality, the Next Ten Plan is the biggest impediment to affordable housing. Attached is a map from the Next Ten plan which shows the city’s planned redevelopment sites. Most of the sites that the city has designated as potential redevelopment contain older apartment communities which are fulfilling the current need and are 94% occupied. They are designated on the map as 1-North River, 2-City Springs, and 3-Crossroads. The city is recommending lower density housing in these areas. Of course, this cannot be done without the removal of the existing apartments currently there. There are literally thousands of apartments in the areas that are designated as redevelopment sites.**

**It appears disingenuous for the city to state in the AI that the Next Ten plan is for the benefit of the lower & moderate-income families while they are encouraging the redevelopment of thousands of apartments which would entail their displacement.**

On page 69, Point 7, the city contends that a Taskforce was created in February 2018 *“for conducting detailed research and analysis on available resources to be used to incentivize and promote the redevelopment of certain areas of the city in the north-end, as well as evaluating potential workforce housing policies”*. *“In January 2019, the Taskforce submitted a plan for the north-end revitalization, which included among other recommendations, “a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there.”*

**Having served on this Task Force, we are very familiar with the processes and results of this effort. There was no “detailed research and analysis” done. In fact, we were told that there was no need to have expert knowledge brought in. The final report recommended that a “catalyst project” should be implemented and then used as a model for other similar redevelopments in the city (not only in the north-end).**

The initial catalyst project recommended removing four apartment communities with over 1,200 apartments, that would be replaced by single-family homes. There was no mention as to the impact of such major displacement nor any right of return for the current residents even though that was part of the Taskforce mission statement. The apartments targeted had a population of approximately 4,000 residents and 67% non-white.

In addition, the Taskforce also recommended other significant improvements made to the area that would accelerate the gentrification of the surrounding area; thus, increasing rents and forcing more displacements.

A copy of the Task Force report is attached; It has been annotated with comments to clarify the wording and give insight into the plan.

### **Little Communications to lower & moderate-income populations.**

A large part of the AI report refers to the need for communication to the low & moderate-income populations.

The city has 53% of its population living in rental housing. The main newspapers serving Sandy Springs are the Reporter and the Neighbor.

Neither of these newspapers are directly attempting to serve the rental residents. Both publications are distributed almost exclusively to owner-occupied single-family homes either by hired-carriers delivering their papers to the driveways or mailed to selected routes within zip codes.

The city needs to find a better means to address such a large portion of their residents. Possibly new digital social media including the Patch and Nextdoor could be used in an effective manner in reaching and informing the 50,000 residents living in the apartments.

### **In conclusion:**

We feel that the city should revise this AI report to take into consideration the points we have raised. We would like to think that none of our city's actions like those in Mr. Scott Markley's study of "Demolition to displacement and race in Atlanta's northern suburbs Oct 2018" are intentional.

Presently, the CDGB funds have been used primarily for sidewalks within our city. This benefits all our residents including those that "walk the most", the lower income residents. The city is at a point now where it should reevaluate how these funds are used to be of more benefit directly the lower and moderate-income families. Possibly an affordability housing study would be a better investment and benefit the lower and moderate-income families more directly.

Submitted by

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