

City of Savannah Assessment of Fair Housing

March 2017
(Revised May 2017)

Prepared for
Savannah, Georgia
by



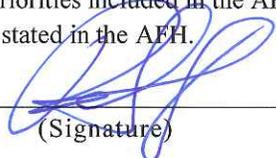
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I. Cover Sheet

1. Submission date: May 25, 2017
2. Submitter name: City of Savannah, Georgia
3. Type of submission (e.g., single program participant, joint submission): Single Participant
4. Type of program participant(s) (e.g., consolidated plan participant, PHA): Consolidated Plan Participant
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable): N/A
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 - e. City: Savannah
 - f. State: GA
 - g. Zip code: 31401
8. Period covered by this assessment: January 1, 2018 – December 31, 2022
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

 _____ (Signature)	_____ (date)
N/A _____ (Signature)	_____ (date)
N/A _____ (Signature)	_____ (date)

Departmental acceptance or non-acceptance:

(Signature) (date)

Comments

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

The City of Savannah receives funds from the United States Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) program. As a participant in this program, the City is required to complete a fair housing study known as an Assessment of Fair Housing (AFH). The AFH studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs. Based on the findings of this research, this AFH proposes fair and affordable housing strategies to overcome the identified fair housing issues.

This Executive Summary provides a brief overview of the study's key findings, followed by an outline of the proposed goals and recommended actions.

Segregation and Integration

Levels of racial and ethnic segregation, as measured by a dissimilarity index, were generally found to be low or moderate. The greatest degree of segregation exists between Black and White residents in both the city and region. Hispanic/White and Asian/White segregation was considerably less pervasive. By 2010, the city of Savannah was less segregated than the region by every measure; however, this fact overlooks that segregation levels in Savannah increased between 2000 and 2010 after dramatic decreases between 1990 and 2000. Though segregation between Blacks and Whites ticked up slightly between 2000 and 2010, it continued a steady decline in the greater Savannah region, falling just below the threshold for designation as a high level of segregation for the first time since at least 1990. Factors contributing to segregation in Savannah include the location and types of affordable housing, discrimination in the private housing market, and the City's zoning laws.

Racially and Ethnically Concentrated Poverty

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). As of 2010, Savannah contained six R/ECAP census tracts, all in or adjacent to the downtown and midtown areas. The share of R/ECAP residents who are Black is more than twice that of the region; the share

who are White is less than half that of the region. Roughly 6% of the city's White population lives in an R/ECAP, compared to about 11% of its African American population.

Historical data indicates that concentrations of poverty have existed in several neighborhoods in and around Savannah's downtown for at least 20 years. While some R/ECAP pockets changed over time, in other areas – Yamacraw Village, Hitch Village/Fred Wessels Homes, and Cuyler-Brownville – poverty has been persistent. The former two neighborhoods include concentrations of public housing, a major contributing factor to the areas' elevated poverty rates. Other contributing factors include the displacement of residents due to gentrification, lack of investment in impoverished neighborhoods, impediments to the mobility of residents, and the presence of deteriorated and abandoned properties.

Disparities in Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. This report provides analysis of the index scores on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health.

Overall, non-Latino Whites tend to live in neighborhoods with lower poverty and higher school proficiency and labor market engagement index values than minority population segments, both in the city of Savannah and in the region. R/ECAP census tracts generally had low scores in each of these dimensions. Opportunity factors related to access to transit and job centers showed less disparity and, in many cases, Whites lived in areas with lower scores and thus less access than other groups. Most R/ECAP tracts had higher scores on these dimensions. The available types and locations of affordable housing, the locations of proficient schools, impediments to resident mobility, zoning laws, and private market housing discrimination are all thought to contribute to these disparities.

Disproportionate Housing Needs

Four unique housing needs are designated for analysis in this section of the report: cost burden, overcrowding, dwellings lacking complete kitchen facilities, and dwellings lacking complete plumbing facilities. Nearly one-half of households citywide have one or more of these housing needs (45.20%). African American, Native American, and Latino households experience housing needs at disproportionately higher rates than Whites. Persons of other races are also disproportionately likely to face severe housing needs and severe cost burdens. In almost all instances, city of Savannah households have higher rates of need, severe need, and severe cost burdens than their counterparts in the region. These disproportionate housing needs are created by differences in the availability of affordable units in a range of sizes and the displacement of residents due to economic pressures.

Publicly Supported Housing

Public housing in Savannah is operated by the Housing Authority of Savannah and not by the City; however, the data available for this analysis reveals that public housing units and Housing Choice Voucher (HCV) program units are overwhelmingly occupied by Black households. While making up just over half of the city's population, Black residents make up almost 97% of the public housing residents and 95% of Housing Choice Voucher holders. White residents (37.1% of the city's population) made up just 3% of public housing and voucher households. Hispanic and Asian households are also underrepresented in all types of public housing. White households, while significantly underrepresented in public housing and HCV units, are far more likely to live in Project-Based Section 8 or other subsidized multifamily units.

Several Project-Based Section 8 properties displayed demographic compositions that skewed heavily toward a particular group. Units at Oakbrook Towers were 93% occupied by Whites and just 4% by Blacks; at The Woods of Savannah, White households represented 79% of the units while 16% were occupied by Black households. These examples contrast sharply with the Snap Apartments where the 233 total units were 99% occupied by Black households and St. John's Villa where 95% of tenant households were Black. Factors creating or contributing to fair housing issues related to publicly supported housing include siting selection policies, impediments to resident mobility, occupancy codes, and discrimination against households on the basis of their use of a Housing Choice Voucher.

Disability and Access

In the city of Savannah, an estimated 18,019 persons over the age of 5 have a disability, representing 13.2% of the total population. Seniors (persons age 65 and older) have by far the highest disability rate at 43.7%. HUD's Multifamily Inventory of Units for the Elderly and Persons with Disabilities identifies a total of 276 subsidized units with accessible features in 25 properties in Savannah as of 2010. The City of Savannah requires that tax credit developers meet FHA accessibility requirements, but also encourages that all units be designed to be visitable. Habitat for Humanity, which constructs single-family affordable homes in the city, designs its homes to be visitable and can build them to be fully-accessible if desired by the property owner.

For persons with disabilities who need a reasonable accommodation or modification to their dwelling, the City's zoning code typically will require following procedures for a variance; however, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. Savannah has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements.

Fair Housing Enforcement and Outreach

Savannah's primary source for fair housing information, outreach, and enforcement is currently the Savannah-Chatham County Fair Housing Council, one of only two such organizations in the state. Although not specifically focused on the Savannah area, the Georgia Commission on Equal Opportunity and the U.S. Department of HUD also provide some limited support for local fair housing initiatives.

For the period 2011 through 2016, three cases of alleged housing discrimination in Savannah resulted in federal litigation, and one national case involving housing units in Savannah led to a significant conciliation agreement with HUD. These four cases involved discrimination on the basis of race, sex, or disability. Both federal and state laws prohibit housing discrimination based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by federal law, and moreover, prohibits local governments from adopting fair housing ordinances that extend protected class status to individuals who are not currently protected under the Georgia Fair Housing Act. The lack of flexibility for additional local fair housing protections (against, for example, source of income discrimination), lack of adequate public fair housing enforcement, and the lack of sufficient resources for fair housing organizations all contribute to a deficiency in fair housing enforcement and outreach in Savannah.

Fair Housing Goals

The following six goals are outlined in detail in this report and are proposed to direct strategies that will alleviate the fair housing issues and their contributing factors as described above.

- 1. Support a comprehensive regional affordable housing strategy:** Working together with the Chatham County-Savannah Metropolitan Planning Commission, Coastal Georgia Indicators Coalition, Housing Authority of Savannah, Chatham County, and neighboring municipalities, the City of Savannah will participate and contribute staff and resources to a regional effort to develop a comprehensive affordable and workforce housing strategy. The Strategy will consider such factors as the market demand for units of various types, sizes, and accessibility features; market pressures caused by gentrification and expanding areas of student or tourist-oriented development; opportunities for the siting of multifamily and scattered-site single family housing in areas of opportunity throughout the region; protocols for expeditious resolution of blight, delinquent property tax, and cloudy title issues negatively impacting properties and neighborhoods in order to clear the way for residential rehabilitation or development; programs and incentives that can be offered to private sector developers to encourage participation in the retention and creation of affordable and workforce housing; and measures directed at substantially diversifying and increasing local government and private funding, including dedicated funding sources, that support the Savannah Affordable Housing Fund. The strategy will also consider ways to identify and diffuse negative perceptions and pushback from residents during its implementation.

2. **Foster opportunities for greater mobility of low- and moderate-income residents:** The Housing Authority of Savannah assists residents in evaluating mobility options and becoming established in new communities of choice. A proactive effort will also be made to expand the number of landlords and property managers who will accept tenants with Housing Choice Vouchers, particularly at properties in high-opportunity locations.
3. **Support local fair housing education and enforcement efforts:** The City of Savannah will provide on-going fair housing education and support enforcement services. Fair housing education will be included as part of first time homebuyer education sessions and will include information on how to identify and avoid predatory loan products. A collaborative effort involving support from Chatham County and other regional partners will be considered to increase the potential impact of the City's investment.
4. **Improve existing low-opportunity neighborhoods:** The City will continue to take steps to improve existing low-opportunity communities by investing in infrastructure improvements, partnering with non-profit housing providers and the public housing authority on neighborhood revitalization projects, and encouraging private investment and job creation. City staff will consult as needed with the Savannah-Chatham County Public School System regarding school proficiency in areas where focused revitalization is planned or is already occurring to jointly discuss ways of working together to improve both school conditions and the surrounding neighborhood.
5. **Offer information and services to increase housing options for people with disabilities:** The historic nature of many housing units in Savannah makes accessibility modifications especially challenging. The City will look for ways to partner with local organizations that assist people with disabilities in the cost and installation of accessibility modifications. Further, an information and referral service for people with disabilities seeking accessible housing or who may have questions about obtaining such housing will be explored.
6. **Review and amend City ordinances as appropriate to further fair housing choice:** Two different City ordinances were described by stakeholders consulted in the AFH development process as being problematic and in need of reconsideration. The City's Crime-Free Housing Ordinance will be forwarded to the city attorney for review in light of updated 2016 guidance from HUD's Office of General Counsel regarding the application of Fair Housing Act standards to the use of criminal records by housing providers. The City's Derelict Property Ordinance will also be forwarded to the city attorney for review to ensure compliance with Section 818 of the Fair Housing Act. If necessary and appropriate based on the city attorney's review, the City will consider amendments to the ordinances to ensure greater fair housing protections and choice for residents. In addition, staff from the City's Community Planning and Development department will be engaged in the zoning update process to educate planners and others involved with the process about fair housing and advocate for changes that would expand fair housing choice.

III. Community Participation Process

2. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The City of Savannah’s approach to community participation was broad-based and successfully achieved meaningful engagement with residents and stakeholders from across the city. The approach included two well-attended public workshops, interviews with a variety of stakeholders representing many varied points of view, a public survey with 261 respondents, and a dedicated project website with 235 unique visitors and over 1,350 pageviews.

The primary points of engagement for members of the general public were two Fair Housing Workshops. These were advertised by flyers circulated through various email distribution lists, posting on the City’s website, a press release circulated to local media outlets, and a notice on the Community Calendar in the *Savannah Morning News*. At least two local TV stations aired announcements and/or interviews regarding the AFH, and a subsequent article in *La Voz Latina* described the AFH project, further increasing publicity. The two workshops were held as follows:

Tuesday, November 1

6:00 – 7:30 p.m.

Coastal Georgia Center
305 Fahm Street

Wednesday, November 2

3:00 – 4:30 p.m.

Coastal Georgia Center
305 Fahm Street

Flyers and surveys were distributed in English and Spanish. The flyers contained special instructions for participants on requesting interpretation services for those with hearing difficulties or with limited English proficiency. Meeting locations were ADA accessible and served by public transit. The diversity of the participants in the public engagement process is best documented by responses to the public survey. Of the 261 respondents:

- 59% were people of color
- 20% had household incomes under \$25,000 per year
- 19% represented households containing one or more people with a disability
- 15% represented households where a language other than English is spoken
- 29% were renter households
- 6% lived in public housing or other subsidized housing
- 3% were homeless

These demographic statistics represent the City's success in reaching and including populations that are traditionally underrepresented in public planning processes.

3. Provide a list of organizations consulted during the community participation process.

Representatives of the following organizations were consulted in some fashion in the development of this AFH. Consultations may have occurred in an interview or focus group, through phone or email correspondence, or participation at a public meeting or event.

- BB&T Home Mortgage
- Carver Village Neighborhood Association
- Chatham Area Transit
- Chatham-Savannah Authority for the Homeless
- City of Savannah Department of Community Planning and Development
- City of Savannah Department of Housing
- City of Savannah Development Services Department (Zoning)
- Coastal Empire Habitat for Humanity
- Consumer Credit Counseling Service of the Savannah Area
- Cuyler-Brownville Neighborhood Association
- Edgemere/Sackville Neighborhood Association
- Feiler Park Neighborhood Association
- First African Baptist Church
- Georgia Dept. of Behavioral Health & Developmental Disabilities – Region IV
- Georgia Legal Services
- Housing Authority of Savannah
- Interdenominational Ministers Alliance
- La Voz Latina
- Leeds Gate Neighborhood Association
- Living Independence for Everyone (LIFE)
- Mercy Housing
- Metropolitan Planning Commission

- Metropolitan Savannah Area Hispanic Chamber of Commerce
- Mortgage Bankers Association of Savannah
- National Alliance on Mental Illness (NAMI) – Savannah
- Savannah Area Realtors
- Savannah-Chatham Council on Disability Issues
- Savannah-Chatham County Fair Housing Council, Inc.
- Savannah Development and Renewal Authority
- Savannah State University
- The Woda Group
- Thomas Square Neighborhood Association
- Union Mission

4. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

The City’s community participation efforts were successful. A total of 69 people attended one of the two fair housing workshops offered. Discussion in these settings was insightful and constructive. Over 25 community stakeholders were interviewed either individually or in small group settings with peers from related organizations. These stakeholders represented a wide variety of viewpoints, from professional fair housing advocates to local planning and zoning staff, to neighborhood association presidents, to influential pastors and religious leaders. A public fair housing survey was completed by 261 respondents representing various populations that are traditionally difficult to engage in community planning efforts. The AFH project’s website was visited by at least 235 unique users. Awareness within the community was enhanced through local media coverage: at least two local networks aired segments about the AFH process on TV newscasts and *The Savannah Morning News* included public events related to the AFH on its community calendar.

5. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

For the community participation process associated with this AFH, the consulting team developed a standard question set for use in public workshops, interviews, and focus groups. Listed below are each of the standard questions along with summarized comments from the public and other stakeholders. Stakeholder comments do not necessarily reflect the views of the City of Savannah. There were no comments or views expressed that were not accepted by the City.

Question 1: Where are Savannah’s areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?

- Ardsley Park, Savannah Gardens, Victorian District, Thomas Square, Baldwin Park
- Wilmington Island, Georgetown, and Pooler (outside city limits) are also good areas
- Urban environments are desirable
- People want to live near grocery stores and drug stores
- Good schools are important, bus service

- Active neighborhood associations, sense of community
- Community safety

Question 2: Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might limit housing choices?

- Low-income Whites can live in areas where low-income Blacks can't
- There are no wealthy neighborhoods that are also diverse
- Some streets can't accommodate paratransit vans
- The City's crime-free housing program restricts housing choice; probably illegal as well
- There are gender differences – landlords will rent to men over women
- Landlords will refuse children, vouchers
- Question assumes income is equal, but income is not equal which puts a disproportionate strain on minority households
- Manner of advertising: if available units are advertised online, who does that leave out?
- If you're assumed to be gay, you may have limited options
- Some landlords don't want to deal with tenants who are disabled
- Lack of reputable mortgage officers who are bilingual
- General lack of information in Spanish: rental insurance, leases, homeownership process, Housing Authority and/or City housing programs, Section 8 voucher application process

Question 3: Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?

- Income drives segregation
- Some neighborhoods have just always been segregated
- Different neighborhoods have different cultural identities
- People feel most comfortable around people like them
- Latino community may self-segregate for a sense of safety

Question 4: Are you aware of any housing discrimination that occurs in the region? What are some things that can be done to overcome discrimination?

- Yes, discrimination based on gender, marital status, race, and religion (to the extent clothing/dress is involved)
- Don't know of any discrimination; don't even hear rumors about it
- Recently experienced a case of different rental terms offered, suspected to be based on race
- Personal experience of race-based steering by a real estate agent in the 1990s
- Property managers aren't always cooperative in giving out information on apartments
- Rents differ when asking in person vs. researching online

- Discrimination based on ethnicity, particularly in the rental market; landlords not wanting to rent because they assume will be a large household
- Landlords refuse to make repairs because they believe tenants have few housing options and will not report code enforcement; when code enforcement is called and finds a violation, they follow-up with the landlord rather than the tenant

Question 5: Is there an adequate supply of housing that is accessible to people with disabilities?

- Housing is available (Williams Court, Chatham Apartments, Sister's Court, etc.)
- LIFE does a good job of providing ramps for people who need them
- Major lack of housing for people with disabilities
- Accessibility needs are a big problem – and not just for people with mobility impairments
- There are some large-scale towers, but these frequently aren't the arrangements people would choose given other options

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

- The Fair Housing Council does a good job of educating the real estate community
- People generally don't know what assistance is available to them and can lose housing as a result
- Georgia Legal Services
- NAMI-Savannah
- Call 211
- Call an attorney
- The Fair Housing Council is underfunded and understaffed
- Lack of understanding by the Latino community about what their housing rights are; would like to see additional engagement by the Fair Housing Council with Savannah's Latino community, possibly working through churches to provide education

Question 7: Are public resources (e.g. parks, schools, roads, police & fire services, etc.) invested in evenly throughout all neighborhoods?

- At least in past administrations, funding was invested in those neighborhoods that needed it most (Fellwood, Hitch Village, Anderson/Henry)
- Roads in tourist areas are better – have trees, sidewalks
- There are good facilities in low income areas
- Public facilities tend to be improved in conjunction with redevelopment of public housing projects – this is good for neighborhoods
- Jennifer Ross Soccer Complex – example of giving in to White demand
- Some neighborhoods don't get community policing when it would be beneficial
- Drainage is not properly maintained in all areas

- Yes, investment is equitable
- There are sidewalk and streetlighting deficiencies in some low income neighborhoods
- Schools quality varies in different locations
- There are parks throughout the city but they are not maintained evenly; maintenance is better if it's done by a community association

Question 8: Is there anything we haven't discussed that you feel is important to our research?

- Don't know of any landlords or housing developers who aren't White; there need to be people at the table who have the experience of needing affordable housing
- Downtown is serving students and tourists, but not the large low-income and minority populations on either side (Yamacraw & Hitch)
- Housing Authority of Savannah can be adversarial toward its tenants
- Savannah has a high rate of evictions; tenants win only about 10% of dispossessories
- Title issues are common; people need help with wills to preserve title when property is passed down
- Limited resources and assistance for people facing domestic abuse
- When title is not in the occupant's name, property won't qualify for tax exemptions or grants to repair/maintain property
- Cloudy title shouldn't be an excuse for the City to let vacant properties sit – other cities have figured out solutions to this problem
- City needs to identify a dedicated funding source for its Affordable Housing Fund
- Need more diversity among mortgage lenders and real estate agents
- Wish there were less competition between the City and the housing authority; need more of a “how can we develop together” mindset
- Scarcity of affordable housing puts tenants in collusion with landlords to perpetuate substandard living conditions – if reported and condemned, would be nowhere to go
- The housing authority is in the “dark ages”; small board, little interest in innovation, top-down approach to tenants
- The City/County relationship is poor; need to work together on comprehensive policies and programs
- The Latino Officer Outreach Program by the police department was good and should be re-instated

IV. Assessment of Past Goals, Actions & Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward their achievement;

The City has provided annual funding to the Savannah-Chatham County Fair Housing Council as a CDBG subrecipient. The funding received from the City enables SCFHC to implement a consistent program of fair housing enforcement and education. During 2016, the SCFHC investigated five allegations of housing discrimination and in 2015 hosted a Fair Housing Month luncheon with 69 attendees, facilitated over a dozen trainings for housing industry professionals (including property owners, property managers, and real estate agents), held fair housing and landlord/tenant education workshops for college students and for people with disabilities, and offered 25 fair housing trainings for over 600 prospective homebuyers.

In addition to providing funding to support the important work of the SCFHC, the City along with partner organizations within the community (including the SCFHC), has made progress toward implementing many of the 26 policy recommendations in the City of Savannah's 2010 Analysis of Impediments to Fair Housing Choice. The specific recommendations are listed below, each with a discussion of the progress toward its implementation.

Recommendation #1: Implement the primary recommendation of the *Affordable Housing & Regulatory Reform Task Force* report.

The first recommendation of the *Affordable Housing & Regulatory Reform Task Force* report was that the City of Savannah and Chatham County establish a local affordable housing fund. In 2012, the City created the Savannah Affordable Housing Fund (SAFH) in partnership with StepUp Savannah, the Savannah Economic Development Authority, the Savannah Area Chamber of Commerce, and other business and community leaders. Over the last four years, the City invested \$800,000 in the SAHF for revolving loans; local partners invested an additional \$138,060. Since its inception, the SAHF resulted in \$1.8 million in loans and grants, \$5.1 million in leveraged investment, 140 projects benefitting modest income households, 129 construction contracts, and an employer assisted home purchase program through St. Joseph's/Candler Health Systems.

Recommendation #2: Implement the recommendations of the *Affordable Housing & Regulatory Reform Task Force* that bear on fair housing.

Recommendations from the *Affordable Housing & Regulatory Reform Task Force* report did not specifically address fair housing.

Recommendation #3: Consider adopting building regulations to make all new homes "visitable."

The City has not imposed a requirement that all new homes comply with visitability standards.

Recommendation #4: Devise architectural solutions to making Savannah's historic housing stock accessible.

Numerous buildings throughout the city's historic districts have been made accessible through individual modifications on a case-by-case basis. The National Park Service publishes a technical brief providing guidance and describing different strategies for accessibility in historic buildings and the Metropolitan Planning Commission refers developers to this document for help planning accessibility solutions in historic buildings.

Recommendation #5: Provide sufficient funding for a fair housing agency.

Between CDBG public services funds and City of Savannah general funds, the City has provided approximately \$44,000 annually to the Savannah-Chatham County Fair Housing Council. This amount, while only a portion of the organization's operating budget, is short of the \$300,000 proposed in the 2010 AI as a "sufficient" minimum budget for an effective fair housing agency.

Recommendation #6: Fund additional fair housing counseling services explicitly targeted at poor Hispanic residents.

To the City's knowledge, there has not been any progress in the delivery of housing counseling services specifically to poor Hispanic residents; however, general housing counseling is available from multiple organizations in the community.

Recommendation #7: Dispersal of Housing Choice Vouchers outside of minority geographic concentrations should be adopted as an operational goal by the Housing Authority of Savannah and supported by a program to recruit landlords and counsel voucher holders.

Housing Choice Vouchers are managed by the Housing Authority of Savannah. The City is not aware of any specific efforts on the part of the housing authority to adopt a goal for voucher use outside of areas of racially concentrated poverty or to create a recruitment program for landlords.

Recommendation #8: Institute a program to remediate lead exposure risks focused on residences of young African American children.

The City of Savannah partnered with the State of Georgia Department of Community Health to carry out a lead hazard reduction program in Savannah using funds the State received from HUD. Housing repaired under this program was typically rental units that included children.

The City's home repair projects are typically carried out on owner-occupied single-family detached homes and are limited to building envelope or systems repairs that do not disturb painted surfaces due to funding constraints. The residents of these homes are often seniors, some of whom have children living with them or visiting them. At a minimum, work performed on projects the City is involved with follows lead guidelines for safe work

practices. Staff and private contractors have appropriate certifications. All households living in housing repaired through City of Savannah programs are provided with information concerning the potential health hazards associated with lead paint.

Recommendation #9: Transparently reflect and document the fact that City plan reviews do not assess accessibility or compliance with federal requirements.

City staff reviews multi-family developments for compliance with the 2010 Federal ADA standards related to common and public areas. Staff also requests that design professionals and builders provide an e-mail statement acknowledging that their plans are compliant with the accessibility requirements of the Fair Housing Act.

Recommendation #10: Strive for more balanced representation on public boards and commissions.

Staff at the Metropolitan Planning Commission report that the City has made conscious effort to solicit applications from diverse groups for board openings. Of the six City-appointed members of the Planning Commission, four are African-American and one is a woman. Of the five members of the City's Zoning Board of Appeals, three are African-American and two are women. The 11 members of the Historic Review Board include two African-Americans and seven women.

Recommendation #11: Analyze the number and location of accessory dwellings permitted during the last three to five years.

The City's Development Permit Services office issues permits for accessory dwellings. These permits are tracked and recorded, but have not been analyzed for fair housing impacts.

Recommendation #12: Expand the number of residential zoning districts that permit accessory dwellings to include the primary one family residential areas (R-20, R-10, and R-6).

The City and its partners are not aware of progress made toward the implementation of this recommendation.

Recommendation #13: Consider zoning land such that there is a supply of zoned, vacant and developable land adequate to enable as-of-right development for each primary residential use.

The City and its partners are not aware of progress made toward the implementation of this recommendation.

Recommendation #14: Ensure that resident interests are not damaged during future public housing redevelopment.

Public housing is managed by the Housing Authority of Savannah. The City is not aware of any specific efforts on the part of the housing authority to weigh resident interests in redevelopment projects.

Recommendation #15: Amplify and extend current efforts to contend with the negative effects of gentrification.

Savannah residents displaced as a result of gentrification or having difficulty locating affordable housing in gentrifying neighborhoods may use the State of Georgia's housing search website (www.georgiahousingsearch.org) to help locate available rental housing meeting the specific needs and criteria of the household.

Recommendation #16: Create a functioning information system for accessible rental units.

The City and its partners are not aware of any local information system for accessible rental units. A statewide system is available through the Georgia Department of Community of Affairs at www.georgiahousingsearch.org. This system allows people to search for accessible rental housing throughout the state (including in Savannah) using a series of filters including use of housing subsidy (Section 8 voucher, VASH, etc.); senior housing; and distance from public transit, shopping, and hospitals.

Recommendation #17: Create a reserve fund to temporarily rent accessible rental housing until it can be occupied by a household in need of an accessible unit.

The City of Savannah has not created a reserve fund to temporarily rent accessible rental housing and is not familiar with any local organizations that have such a fund.

Recommendation #18: Vigorously work to retain Low Income Housing Tax Credit units with expiring contracts in the moderate-income housing supply.

The City of Savannah works to retain affordability in Low Income Housing Tax Credit developments with expiring contracts. LIHTC properties that have been preserved as affordable since the City's previous AI include Sister's Court, Telfair Arms, and Rose of Sharon. All three communities are in or adjacent to historic areas.

Recommendation #19: Extend the analyses of racial disparities in mortgage lending to financial institutions. Include performance in decisions on placement of City of Savannah funds.

Staff in the City of Savannah's Housing Department work with first-time homebuyers and maintain relationships with lenders, particularly those with a successful track record of working with low- and moderate-income first-time homebuyers who may be participants in downpayment assistance programs. Beyond these relationships with individual lenders, the City is not aware of an extended analysis conducted into racial disparities in the lending of individual institutions and has therefore not made banking or other business decisions based on such data.

Recommendation #20: Aggressively prepare to maximize utilization of National Housing Trust Fund funding to further fair housing and provide housing assistance to those most in need.

The City has followed progress of the National Housing Trust Fund and is very interested in working with tax credit and other rental property developers to secure funding for projects.

Recommendation #21: Identify and disseminate information about stable, racially diverse neighborhoods and areas.

This is information that is presented in this AFH. By collecting, analyzing, and publishing the requisite data in this document, the City will be implementing this recommendation.

Recommendation #22: Analyze the dimensions of White to African American racial transitions and develop an action program to limit “panic marketing” practices.

The City and its partners are not aware of progress made toward the implementation of this recommendation.

Recommendation #23: Construct small programs to encourage minority youth to follow career paths that diversify institutions and occupations in the real estate industry.

The City and its partners are not aware of progress made toward the implementation of this recommendation.

Recommendation #24: Judiciously report on the composition of Boards of Directors of prominent real estate industry institutions.

The City and its partners are not aware of progress made toward the implementation of this recommendation.

Recommendation #25: Devise mechanisms and strategies to foster diversity in real estate marketing and advertising.

The City and its partners are not aware of progress made toward the implementation of this recommendation.

Recommendation #26: Update geographic indicators for protected classes using the 2010 Census.

The City’s Department of Community Planning and Development publishes neighborhood profiles and is in the process of updating them with the most recent ACS data. This recommendation is further addressed through the research and data contained in this AFH.

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences);

Considering the limited CDBG and other resources available to the City for the implementation of the 26 recommendations stemming from the 2010 AI, the City has made substantial progress. Not all the recommendations have been implemented, and for some, there has been no demonstrable progress, however, the City has been reliably supportive of fair housing, having committed both CDBG and general fund resources to the cause on an annual basis. As a result of those investments, significant education and enforcement activities have been possible through the Savannah-Chatham County Fair Housing Council, the City’s subrecipient.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced; and

The City's primary constraints on the achievement of the past fair housing goals have been staff capacity and financial resources. By focusing on a smaller number of recommendations, planning timeframes for implementation, and designating either City staff or partner organizations to champion the various strategies, the implementation process will be more accountable and action-oriented.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

While past goals were numerous and highly specific, this AFH proposes a smaller number of goals with more open-ended recommendations to allow the City flexibility in how it ultimately reaches the end results.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Compared with its region (the Savannah Metropolitan Statistical Area, or MSA), Savannah's population is more diverse in terms of race, ethnicity, national origin and language spoken; however, the region's diversity has been increasing at faster rates than that of the city. The majority of Savannah's population is Black (53.19%) while 37.83% of the city's residents are White. This pattern is roughly inverted in the region, which is majority White (57.32%) with just over one in three (33.50%) residents identifying as Black. Population shares for Hispanic, Asian, Native American, and other groups were generally consistent between the city and its region.

The largest share of the foreign-born population in both the city and the region originates from Mexico, although this group makes up a somewhat larger share of Savannah's population (1.94%) than that of the region (1.39%). Among those residents with limited English proficiency, Spanish is the most frequently spoken language, but is more common in the city where it is spoken by 2.35% of residents, compared with just 1.63% of the region's population. For countries other than Mexico, the origins of foreign-born populations are relatively consistent between Savannah and the region, the primary exception being that South Americans, especially those from Peru and Colombia are more prominent in the city while Europeans (from Germany and England in particular) were more common in the region.

While the city of Savannah continues to display greater diversity than the region as a whole, minority population growth outside the city since 1990 has generally occurred at a faster rate. While the city's White population declined by 20.0% between 1990 and 2010, the region's White population increased by almost the same amount, 21.6%. Savannah's Black population grew by just 6.4% over the 20-year period, but the region's black population grew by 32.3% over the same period. These population changes are all modest compared to the growth of Hispanic and foreign-born populations since 1990. While representing small shares of the population in absolute terms, both of these groups more than doubled in size with Hispanic population growth of 229% and foreign-born growth of 223%. The greater region, however, saw even faster growth rates: 465% for the Hispanic population and 320% for foreign-born residents.

Table 1. Demographics

Race/Ethnicity	City of Savannah		Savannah MSA			
	#	%	#	%		
White, Non-Hispanic	52,672	37.83%	199,249	57.32%		
Black, Non-Hispanic	74,053	53.19%	116,466	33.50%		
Hispanic	6,427	4.62%	17,207	4.95%		
Asian or Pacific Islander, Non-Hispanic	3,071	2.21%	7,389	2.13%		
Native American, Non-Hispanic	338	0.24%	803	0.23%		
Other, Non-Hispanic	264	0.19%	604	0.17%		
National Origin	Country	#	%	Country	#	%
#1 country of origin	Mexico	2,615	1.94%	Mexico	4,842	1.39%
#2 country of origin	Vietnam	472	0.35%	India	1,507	0.43%
#3 country of origin	India	405	0.30%	Vietnam	1,214	0.35%
#4 country of origin	Philippines	344	0.25%	Philippines	1,032	0.30%
#5 country of origin	China excl. Hong Kong & Taiwan	329	0.24%	China excl. Hong Kong & Taiwan	968	0.28%
#6 country of origin	Peru	306	0.23%	Korea	724	0.21%
#7 country of origin	Canada	280	0.21%	Canada	686	0.20%
#8 country of origin	Korea	205	0.15%	Jamaica	561	0.16%
#9 country of origin	Jamaica	195	0.14%	Germany	464	0.13%
#10 country of origin	Colombia	174	0.13%	England	432	0.12%
Limited English Proficiency (LEP)	Language	#	%	Language	#	%
#1 LEP language	Spanish	3,030	2.35%	Spanish	5,674	1.63%
#2 LEP language	Chinese	352	0.27%	Chinese	778	0.22%
#3 LEP language	Vietnamese	287	0.22%	Vietnamese	755	0.22%
#4 LEP language	Other Slavic language	118	0.09%	Hindi	297	0.09%
#5 LEP language	Other Asian language	81	0.06%	Tagalog	186	0.05%
#6 LEP language	Korean	71	0.06%	German	171	0.05%

Table 1. Demographics (continued)

Limited English Proficiency (LEP)	City of Savannah			Savannah MSA		
	Language	#	%	Language	#	%
#7 LEP language	French	61	0.05%	Gujarati	158	0.05%
#8 LEP language	Hindi	57	0.04%	Korean	158	0.05%
#9 LEP language	Russian	44	0.03%	French	121	0.03%
#10 LEP language	African	40	0.03%	Other Slavic language	118	0.03%
Disability Type		#	%		#	%
Hearing difficulty		3,871	3.08%		9,914	3.08%
Vision difficulty		2,673	2.13%		6,281	1.95%
Cognitive difficulty		6,198	4.94%		13,640	4.24%
Ambulatory difficulty		10,876	8.67%		22,570	7.02%
Self-care difficulty		4,172	3.32%		8,281	2.58%
Independent living difficulty		7,458	5.94%		14,689	4.57%
Sex		#	%		#	%
Male		66,020	47.42%		168,573	48.49%
Female		73,207	52.58%		179,038	51.51%
Age		#	%		#	%
Under 18		31,725	22.79%		83,770	24.10%
18-64		90,912	65.30%		223,499	64.30%
65+		16,590	11.92%		40,342	11.61%
Family Type		#	%		#	%
Families with children		13,621	43.35%		39,195	44.94%

Notes: All percentages represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The Savannah Core Based Statistical Area (MSA) includes Chatham, Effingham, and Bryan Counties.

Source: Decennial Census; ACS

Table 2. Demographic Trends

Race/Ethnicity	City of Savannah						Savannah MSA					
	1990		2000		2010		1990		2000		2010	
	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	65,898	47.26%	52,605	39.14%	52,672	37.83%	163,826	63.47%	176,406	60.20%	199,249	57.32%
Black, Non-Hispanic	69,629	49.94%	75,365	56.08%	74,053	53.19%	88,026	34.11%	102,848	35.10%	116,466	33.50%
Hispanic	1,954	1.40%	3,052	2.27%	6,427	4.62%	3,048	1.18%	6,372	2.17%	17,207	4.95%
Asian or Pacific Islander, Non-Hispanic	1,511	1.08%	2,432	1.81%	3,071	2.21%	2,351	0.91%	5,215	1.78%	7,389	2.13%
Native American, Non-Hispanic	239	0.17%	530	0.39%	338	0.24%	475	0.18%	1,361	0.46%	803	0.23%
National Origin												
Foreign-born	2,679	1.92%	5,174	3.85%	8,672	6.42%	4,688	1.82%	10,304	3.52%	19,700	5.67%
LEP												
Limited English Proficiency	2,067	1.48%	3,303	2.46%	4,459	3.30%	3,465	1.34%	6,413	2.19%	9,124	2.62%
Sex												
Male	65,653	47.07%	63,494	47.24%	66,020	47.42%	124,155	48.11%	142,016	48.47%	168,573	48.49%
Female	73,835	52.93%	70,915	52.76%	73,207	52.58%	133,905	51.89%	150,984	51.53%	179,038	51.51%
Age												
Under 18	37,336	26.77%	35,300	26.26%	31,725	22.79%	70,387	27.28%	78,933	26.94%	83,770	24.10%
18-64	82,947	59.47%	81,120	60.35%	90,912	65.30%	156,905	60.80%	179,310	61.20%	223,499	64.30%
65+	19,205	13.77%	17,989	13.38%	16,590	11.92%	30,768	11.92%	34,757	11.86%	40,342	11.61%
Family Type												
Families with children	16,234	45.85%	10,530	46.27%	13,621	43.35%	32,767	47.78%	22,454	47.41%	39,195	44.94%

Notes: All percentages represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Source: Decennial Census; ACS

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The areas of Savannah with the greatest rates of homeownership are Cloverdale, Chatham Crescent, Midtown, and Ardsley Park. High concentrations of renter-occupied housing units are in the Chatham Parkway area, the Gordonston, Winter Gardens, and Victory Manor neighborhoods, and in the neighborhoods of Paradise Park and White Bluff. Beyond the city limits, high concentrations of rental housing exist in Port Wentworth and western portions of the unincorporated county in the vicinity of Little Neck and Quacco Roads.

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to some other group. The DI ranges from 0.0 (complete integration) to 1.00 (complete segregation). HUD identifies a DI value between 0.41 and 0.54 as a moderate level of segregation and 0.55 or above as a high level of segregation.

The proportion of the minority population can be small and still not be segregated if evenly spread among tracts. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to achieve a distribution matching that of the majority (or vice versa).

As of 2010, the most recent data depicted in the table below, the dissimilarity index values for all racial/ethnic pairings in Savannah and the greater Savannah region exhibited either low or moderate levels of segregation. The greatest degree of segregation exists between Black and White residents in both the city and region. Hispanic/White and Asian/White segregation was considerably less pervasive.

Table 3. Racial/Ethnic Dissimilarity Trends						
Race/Ethnicity Dissimilarity Index	City of Savannah			Savannah MSA		
	1990	2000	2010	1990	2000	2010
Non-White/White	57.74	47.14	47.33	57.01	51.57	49.65
Black/White	60.62	51.20	51.79	59.97	55.69	54.41
Hispanic/White	32.74	27.21	32.38	31.99	34.41	39.21
Asian or Pacific Islander/White	30.71	23.92	28.46	34.86	32.06	37.73

Source: Decennial Census; ACS

b. Explain how these segregation levels have changed over time (since 1990).

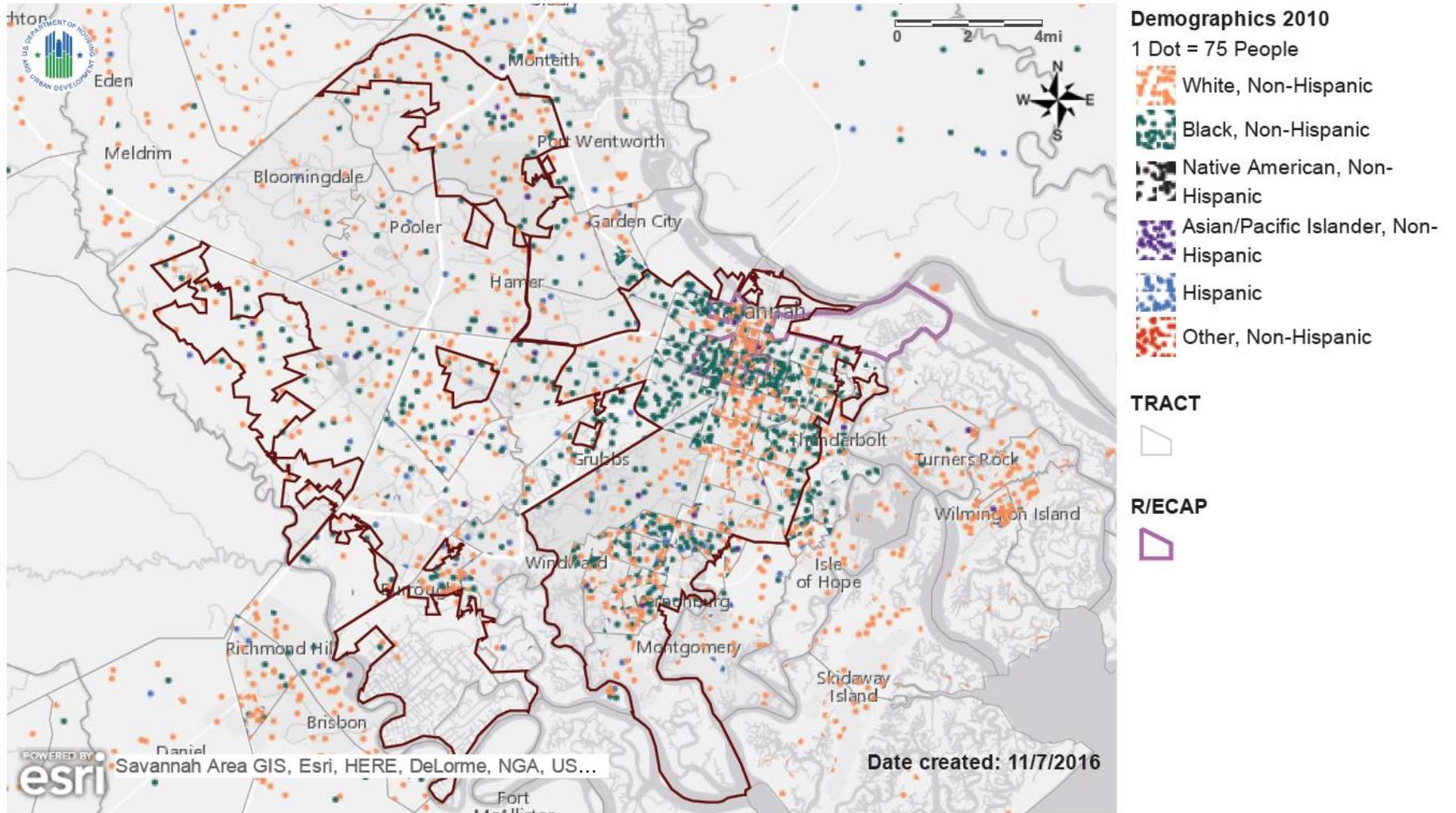
By 2010, the city of Savannah was less segregated than the region by every measure; however, this fact overlooks that segregation levels in Savannah increased between 2000 and 2010 after dramatic decreases (from some relatively high DI values) between 1990 and 2000. Though the city's DI values for the Black/White pairing ticked up slightly between 2000 and 2010, they continued a steady decline in the greater Savannah region, falling just below the threshold for designation as a high level of segregation for the first time since at least 1990. Though categorized as representing low levels of segregation, the DI values for Hispanic/White and Asian/White pairings increased significantly between 2000 and 2010 both in the city and the region.

c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Segregation occurs in Savannah primarily along Black/White lines. Liberty City, Cuyler-Brownville, Eastside, Fellwood, and the Augusta Avenue corridors all showed high concentrations of primarily Black residents. White residents were segregated in the North Historic District, Ardsley Park, and Ardmore. The areas of greatest racial integration were surrounding Oglethorpe Mall and the Highland Park area.

Non-native populations tend to cluster in an area near Hunter Army Airfield in the Wilshire Estates and Leeds Gate neighborhoods. These groups primarily include Mexican, Indian, and Filipino residents. Relatedly, Spanish speakers with limited English proficiency are also clustered in this area and constitute the largest share of persons with limited English proficiency in the city.

Figure 1. Population by Race and Ethnicity in the City of Savannah, 2010



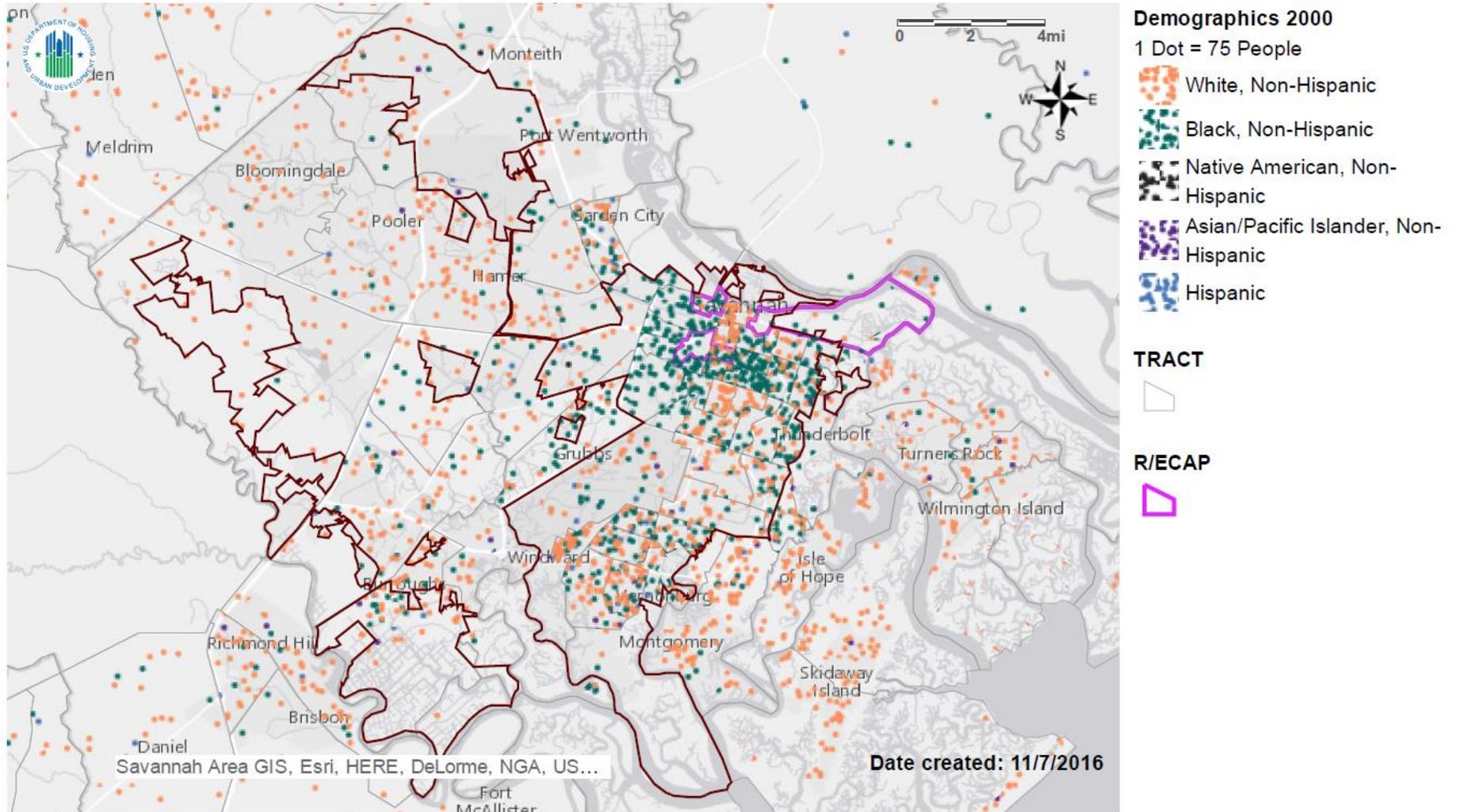
Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 2. Population by Race and Ethnicity in the City of Savannah, 2000



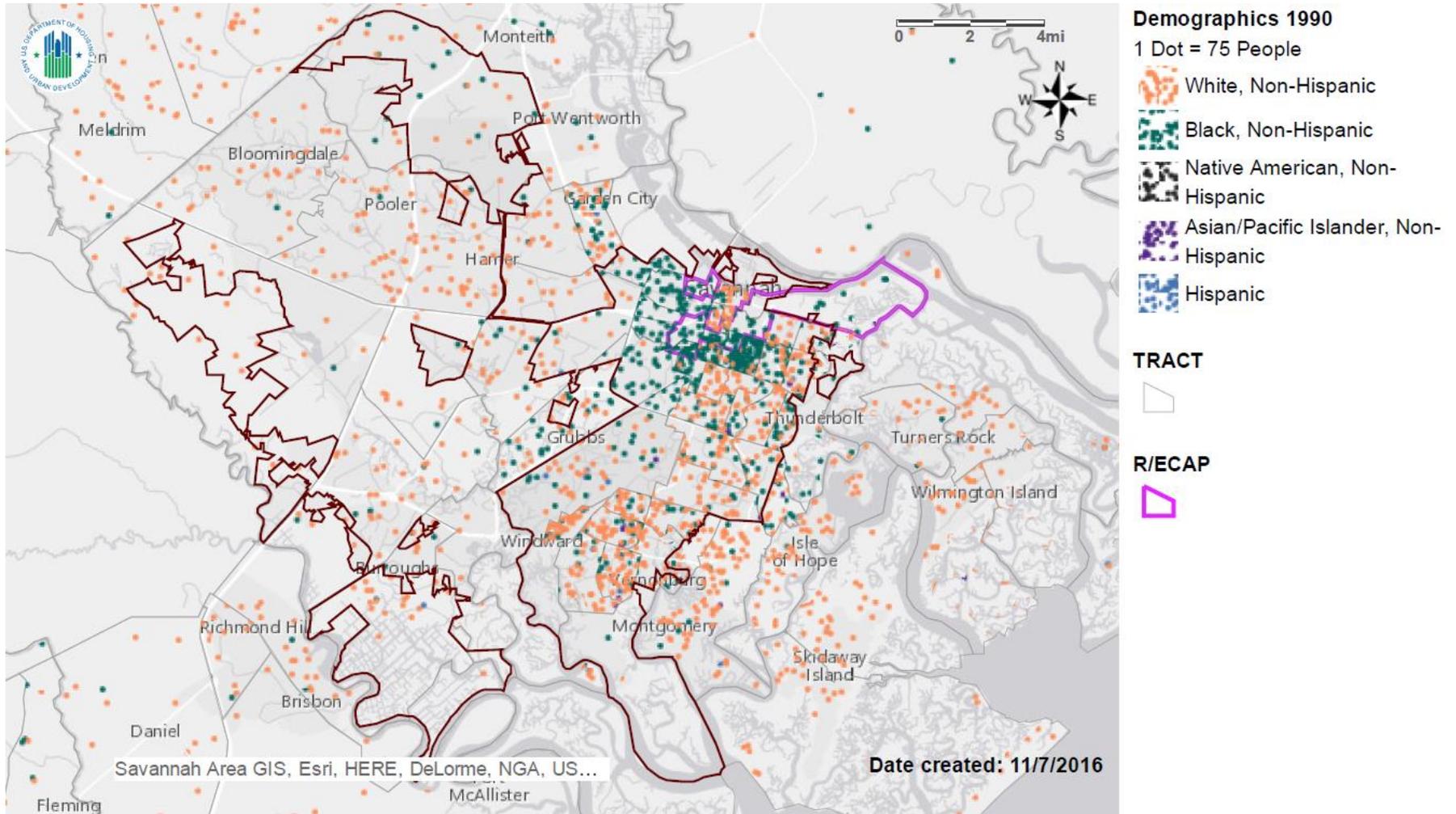
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 3. Population by Race and Ethnicity in the City of Savannah, 1990



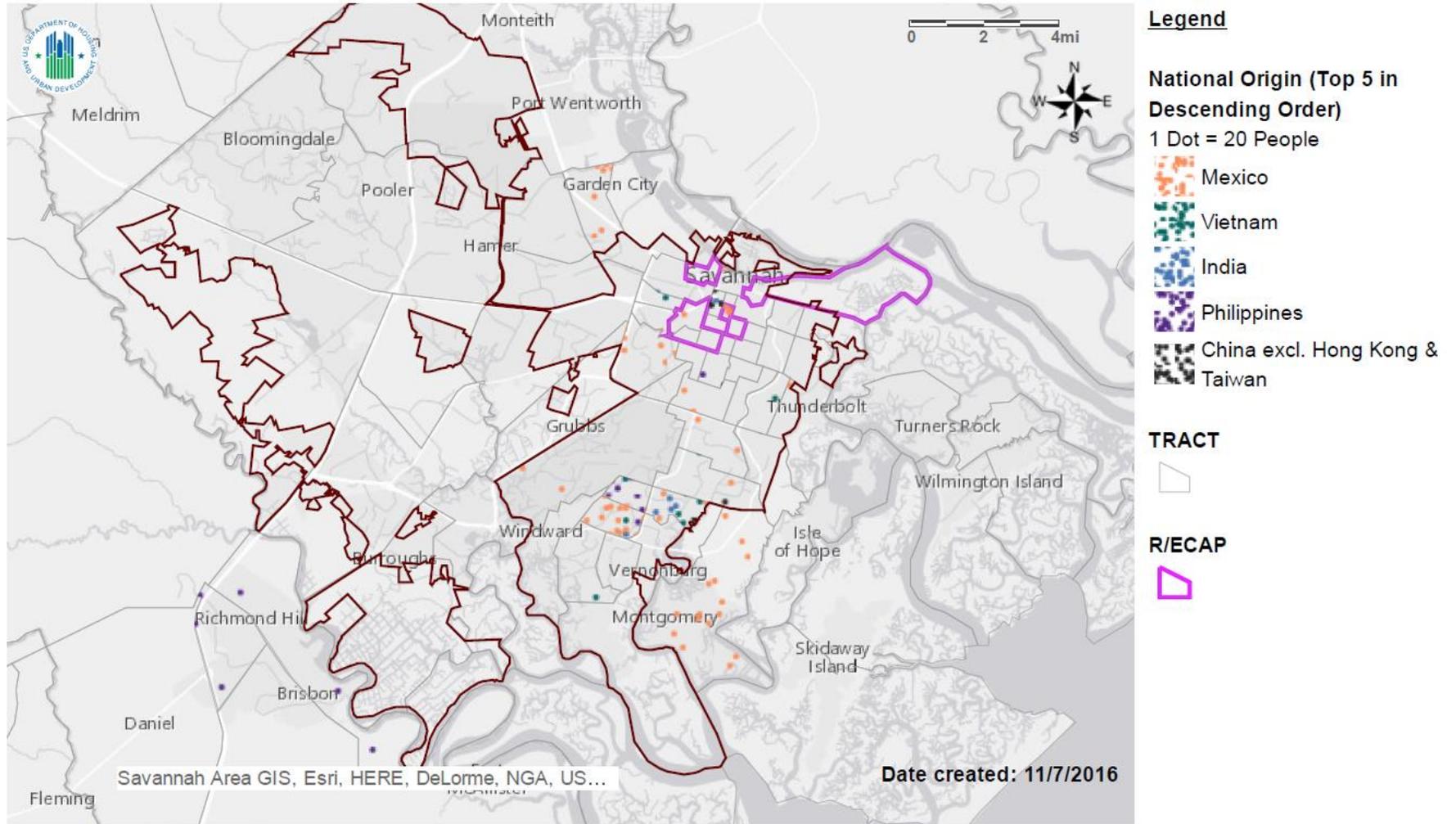
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 4. Foreign-Born Population by Nationality in the City of Savannah



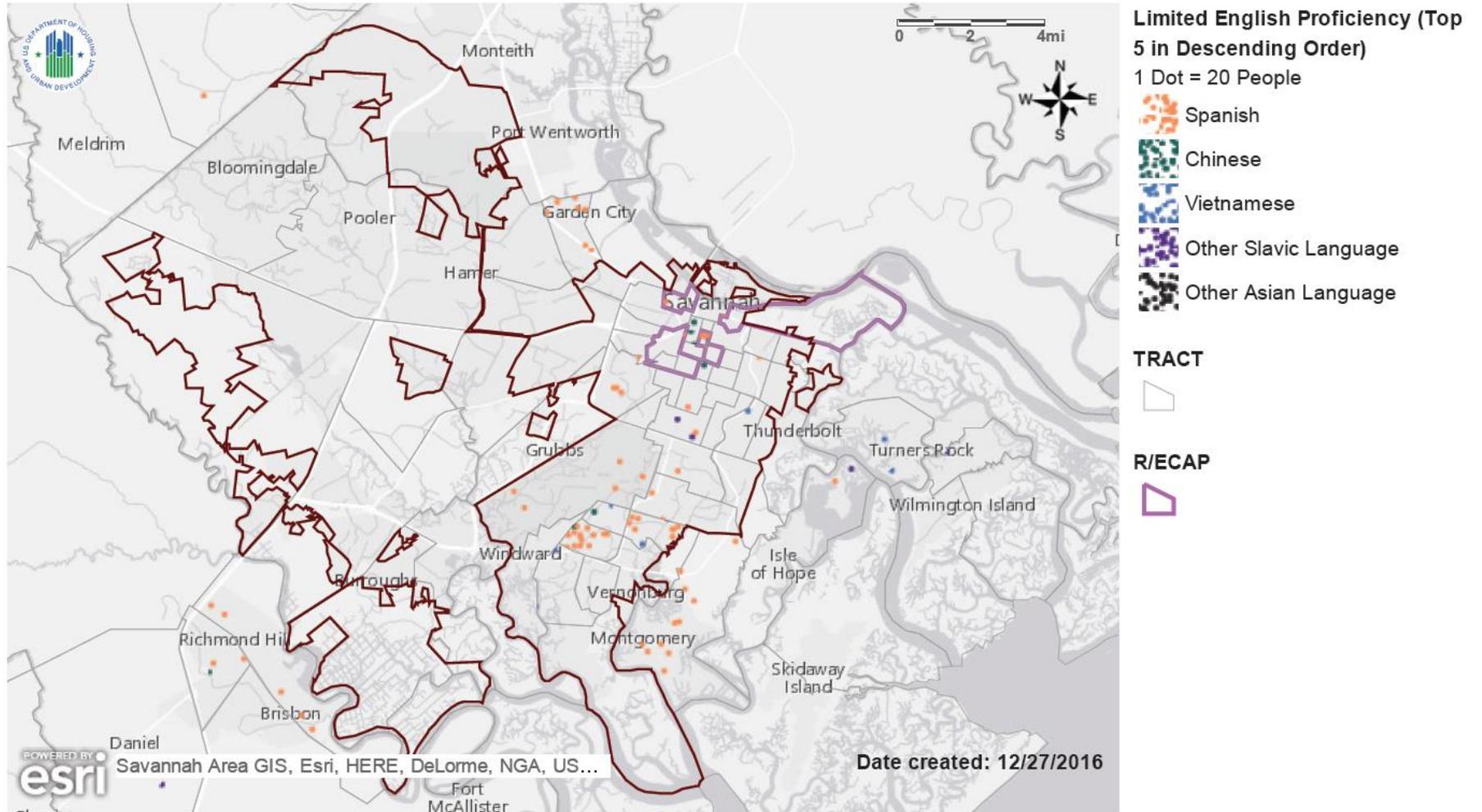
Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 5. Persons with Limited English Proficiency in the City of Savannah



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Areas where White residents are segregated (Chatham Crescent, Ardsley Park) are also some of the neighborhoods with the highest rates of owner-occupied housing units. Rental units were more common in areas of racial integration and places where Black residents were segregated, but this correlation is not as strong as that between White segregation and owner-occupied housing.

e. Discuss how patterns of segregation have changed over time (since 1990).

Some areas of the city, notably Metropolitan and Thomas Square, have become more racially integrated since 1990. Additionally, racial and ethnic diversity has increased beyond Savannah's city limits in Pooler, Georgetown, and in unincorporated west Chatham County along the Little Neck and Quacco Road corridors. While no areas have shown significant increases in segregation since 1990, the North and South Historic District and the unincorporated communities of Skidaway Island and Isle of Hope had persistently high degrees of White segregation over the 1990 to 2010 span. Similarly, the predominantly Black neighborhoods of Cuyler-Brownville, Liberty City, West Savannah, and Eastside showed little change in the degree of their segregation since 1990.

f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

While Savannah's population is becoming increasingly diverse, the dissimilarity index values studied elsewhere in this report indicate that ethnic and racial groups were generally less segregated from one another in 2010 than they were in 1990. Assuming this overall demographic trend continues, the city would become less segregated, even as its population becomes more diverse.

Policies and practices with regard to the siting of public and other subsidized housing have the potential to impact segregation levels in the future, but those impacts would primarily be to decrease or maintain segregation rather than to increase it. Additionally, affirmative marketing practices provide another tool that can help avoid the perpetuation of segregated living patterns. A number of public housing and other properties in the city have been redeveloped into mixed-income communities through Low Income Housing Tax Credits and a mixture of other programs. For example, Savannah Gardens was a private property purchased by the City, demolished with Neighborhood Stabilization Program (NSP) funds, and now features mixed income housing developed by Mercy Housing using LIHTC and HUD 202 program funds. Also, the Savannah Affordable Housing Fund was tapped for single family construction financing on a number of single family homes in Savannah Gardens. Innovative redevelopment projects like Savannah Gardens and others that have occurred throughout the city have the effect of reducing concentrations of poverty, but have done little to foster greater racial or ethnic integration. The latest such project, sited at the former Hitch Village, is currently underway. While not anticipated to lead to higher levels of segregation than are already present, the project could present an opportunity to work toward increased integration.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

Through the community engagement process, several stakeholders mentioned neighborhoods where Jewish households are somewhat segregated, such as Habersham Woods and Abercorn Heights. This segregation is believed to occur by choice due to the proximity of synagogues, schools, and other community resources that serve the Jewish population.

- b. **The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.**

Savannah's current zoning code specifies that "family personal care homes for the handicapped" of 6 or fewer residences, where permitted, cannot be located within 500 ft. of another such care home or other type of care home. Other types of larger group homes for persons with disabilities, or for other vulnerable populations, also are subject to spacing requirements. For example, "group personal care homes for the mentally ill (7-15 persons)", "group care home for the abused or mistreated (7-15 persons)", "group care home for the elderly (7-15 persons)", and "homes for chemically dependent persons" must be 1,000 ft. from any other such home.

The City's spacing/dispersion requirements limit the overall aggregate capacity of housing for persons with disabilities even if the need in the community or region is greater than the thresholds permit. The City has been drafting a new zoning ordinance and the current version (Draft 3) removes the spacing requirement for personal care homes of all types.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Location and type of affordable housing
- Private discrimination
- Land use and zoning laws

ii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

- a. **Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.**

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an

individual poverty rate at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more. As of 2010, Savannah contains six R/ECAP census tracts, all in or adjacent to the downtown and midtown areas (see Figure 6). Specifically, they include:

- Tract 101.01, which includes the Hitch Village/Fred Wessels Homes neighborhood, along with a large area of primarily non-residential land to the west of the city, in unincorporated Chatham County;
- Adjoining Tracts 15 and 20, which cover portions of the Eastside, Midtown, Dixon Park, East Victorian District, and South Historic District neighborhoods;
- Tract 1, where residential development is concentrated in Yamacraw Village and commercial and industrial uses in the Bay Street Viaduct area; and
- Adjoining Tracts 12 and 23, which include the Cuyler-Brownville, Kayton/Frazier, Metropolitan, and Thomas Square neighborhoods, along with the non-residential Laurel Grove/Railroad area.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

Table 4 summarizes the population of R/ECAPs in terms of race, ethnicity, familial status, and national origin. Comparing it with the demographic profile of the entire city and MSA provided in Table 1 allows us to identify protected classes that disproportionately live in R/ECAPs. In terms of racial composition, African Americans comprise a larger share of R/ECAPs (69.01%) than they do of the city (53.19%) and region (33.50%). Whites are less likely to live in an R/ECAP, making up 24.92% of residents there, compared to 37.83% in the city and 57.32% in the three-county region. Thus, the share of R/ECAP residents who are Black is more than twice that of the region; the share who are White is less than half that of the region. Roughly 6% of the city's White population lives in an R/ECAP, compared to about 11% of its African American population.

Each of the other racial and ethnic minority groups make up smaller proportions of the R/ECAP population than they do of the city and region. The most pronounced differences are for Latinos (2.76% of R/ECAPs versus 4.62% of city population) and Asians (1.24% versus 2.21%).

Turning to national origin, natives of Sweden, Colombia, and Ecuador are disproportionately represented in R/ECAPs when compared to the city and region. They each make up 0.2-0.3% of R/ECAPs but not more 0.13% of the city's population. However, the low population of these groups (33 persons or less in R/ECAPs) limit the ability to draw strong conclusions about their geographic distribution.

Finally, families with children are slightly overrepresented in R/ECAPs: 56.14% of families in these tracts have children compared to 43.35% in the city and 44.94% in the region.

c. Describe how R/ECAPs have changed over time (since 1990).

Figure 7 and Figure 8 show R/ECAPs in 2000 and 1990, revealing that these neighborhoods have a history of poverty. The tracts covering the Hitch Village/Fred Wessels Homes, Yamacraw

Village, and Cuyler-Brownville neighborhoods have been majority-minority areas of concentrated poverty since 1990.

Census tracts in and adjacent to Midtown moved in and out of R/ECAP status from 1990 to 2000. The 2010 grouping that includes parts of Midtown, Eastside, Dixon Park, East Victorian District, and South Historic District did not qualify as an R/ECAP; however, it did in 1990. One tract, covering parts of Metropolitan and the East and West Victorian Districts was an R/ECAP in 2000 but not in 1990 or 2010.

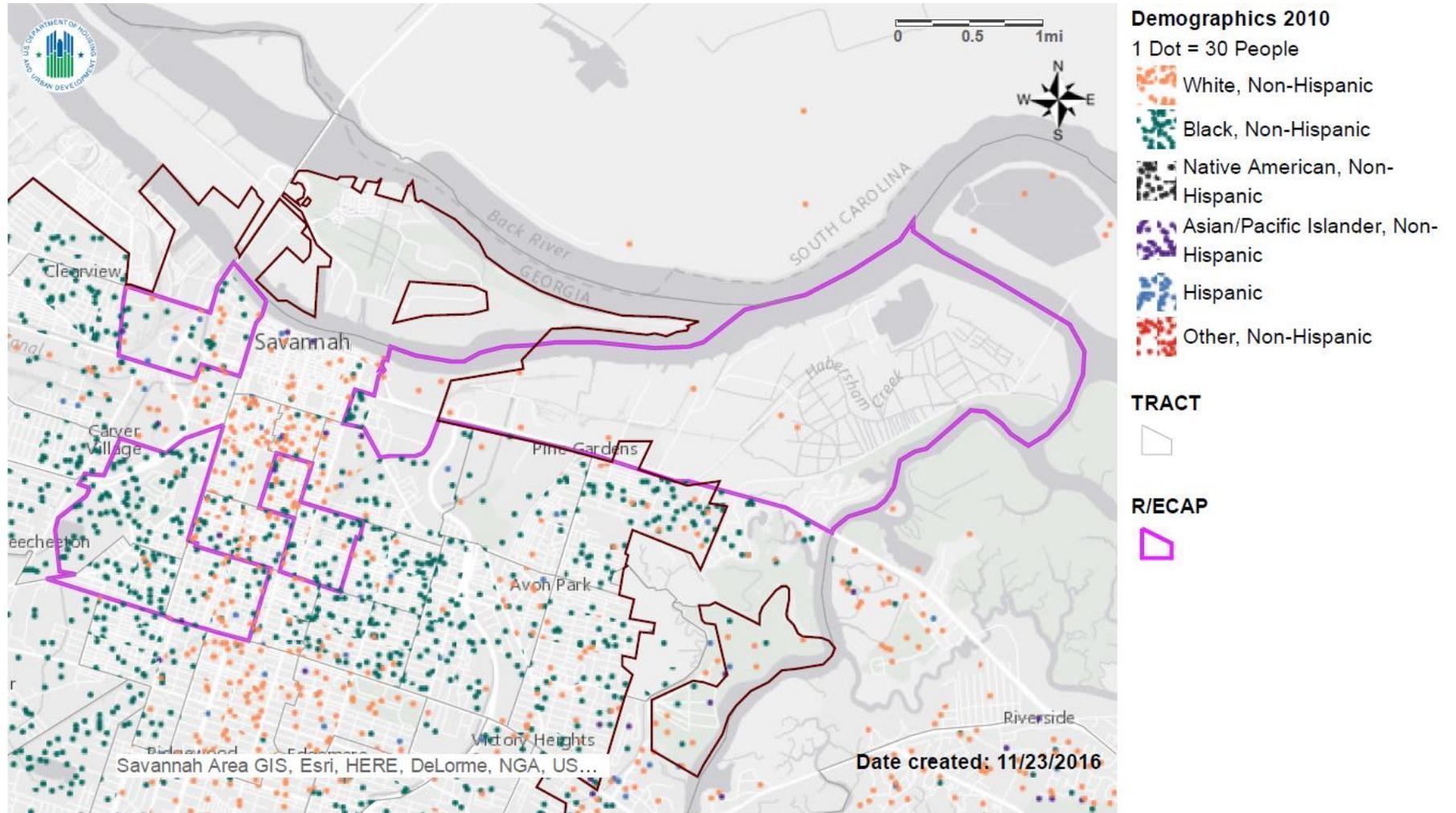
Overall, historical data indicates that concentrations of poverty have existed in several neighborhoods in and around Savannah's downtown for at least 20 years. While some R/ECAP pockets changed over time as households moved in and out, in other areas – Yamacraw Village, Hitch Village/Fred Wessels Homes, and Cuyler-Brownville – poverty has been persistent. The former two neighborhoods include concentrations of public housing, a major contributing factor to the areas' elevated poverty rates. At present, Hitch Village and Fred Wessels Homes are poised for redevelopment as mixed-income properties.

Table 4. R/ECAP Demographics

R/ECAP Race/Ethnicity	City of Savannah		Savannah MSA			
	#	%	#	%		
Total population in R/ECAPs	11,603	-	11,904	-		
White, Non-Hispanic	2,892	24.92%	3,182	26.73%		
Black, Non-Hispanic	8,007	69.01%	8,009	67.28%		
Hispanic	320	2.76%	324	2.72%		
Asian or Pacific Islander, Non-Hispanic	144	1.24%	146	1.23%		
Native American, Non-Hispanic	23	0.20%	23	0.19%		
Other, Non-Hispanic	15	0.13%	15	0.13%		
R/ECAP Family Type	#	%	#	%		
Total families in R/ECAPs	2,118	-	2,220	-		
Families with children	1,189	56.14%	1,206	54.32%		
National Origin	Country	#	%	Country	#	%
Total population in R/ECAPs		11,603	-		11,904	-
#1 country of origin	Mexico	153	1.32%	Mexico	153	1.29%
#2 country of origin	Sweden	33	0.28%	Sweden	33	0.28%
#3 country of origin	Colombia	22	0.19%	Colombia	22	0.18%
#4 country of origin	Ecuador	21	0.18%	Ecuador	21	0.18%
#5 country of origin	China excl. Hong Kong & Taiwan	18	0.16%	China excl. Hong Kong & Taiwan	18	0.15%
#6 country of origin	Belgium	14	0.12%	Belgium	14	0.12%
#7 country of origin	Canada	14	0.12%	Canada	14	0.12%
#8 country of origin	Italy	14	0.12%	Italy	14	0.12%
#9 country of origin	Barbados	13	0.11%	Barbados	13	0.11%
#10 country of origin	Latvia	13	0.11%	Latvia	13	0.11%

Source: Decennial Census; ACS

Figure 6. Racially and Ethnically Concentrated Area of Poverty in the City of Savannah, 2010



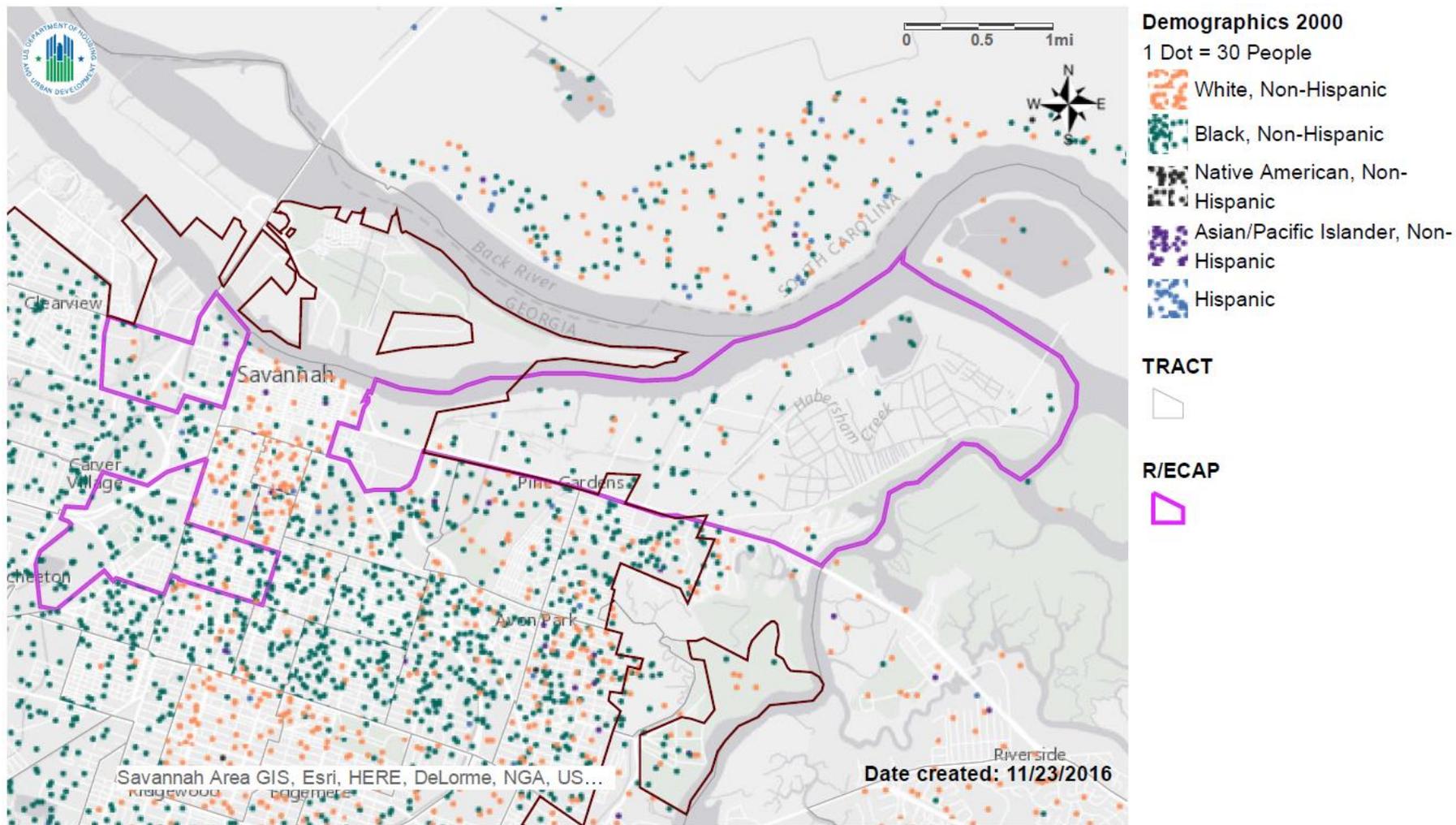
Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 7. Racially and Ethnically Concentrated Areas of Poverty in the City of Savannah, 2000



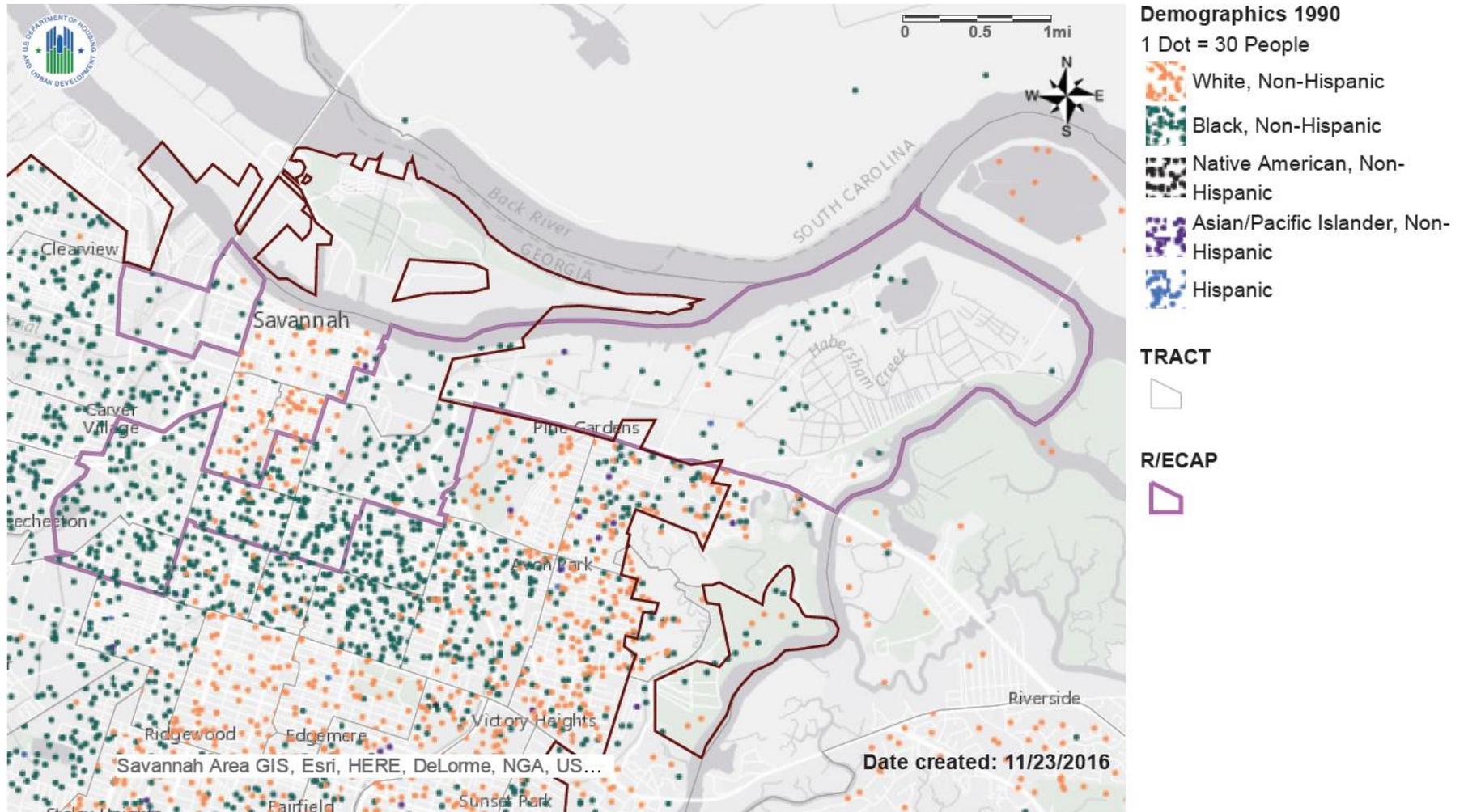
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 8. Racially and Ethnically Concentrated Areas of Poverty in the City of Savannah, 1990



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Along with African Americans, families with children, and some segments of the foreign-born population, members of two other protected classes are disproportionately affected by R/ECAPs. According to the Census Bureau's 2010-2014 five-year American Community Survey estimates, 14.69% of R/ECAP residents have a disability, slightly above the share citywide (13.20%) and in the region (11.60%).

Female householders are also more likely to live in an R/ECAP. Fifty-seven percent (57.06%) of R/ECAP households have a female householder, compared to 44.43% in the city and 34.29% in the region. Further, female householders with children make up 26.59% of R/ECAP households, about double their share in the city (13.89%) and 2.5 times their share in the region (10.67%).

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The City of Savannah and its partners have made significant place-based investments in R/ECAP neighborhoods. In Cuyler-Brownville, efforts to stabilize and revitalize the neighborhood have been underway since the early 2000s. Following adoption of an urban redevelopment plan for the neighborhood, the City created the Cuyler-Brownville planned neighborhood conservation district, an overlay zone intended to ensure conservation, rehabilitation, and redevelopment consistent with the neighborhood's plan. In the early to mid-2000s, the City used its eminent domain power to acquire over 80 vacant or blighted properties for affordable single-family housing development by Habitat for Humanity and other community partners. Mercy Housing used Low Income Housing Tax Credits for the adaptive reuse of the historic Charity Hospital and Florence Street School as 88 affordable apartments. Mercy also renovated Heritage Corner & Row Apartments, which provide 70 affordable units. Capital improvements in the area include development of Floyd "Press Boy" Adams Park, reinstallation of a historic brick street, new sidewalks, and streetlights. Through the work of the City and its partners, the Cuyler-Brownville neighborhood stabilized to the point that private investment is now occurring.

In 2012, the Housing Authority of Savannah received a Choice Neighborhoods Initiative (CNI) Planning Grant for planning related to the East Savannah Gateway, which includes Hitch Village, Fred Wessels Homes, and two other public housing sites in adjoining neighborhoods. CNI is a partnership between HUD and the Departments of Education, Health and Human Services, Justice and Treasury designed to replace distressed public housing with mixed-income communities that improve educational outcomes, intergenerational mobility, and neighborhood amenities. The Housing Authority completed the *East Savannah Gateway Transformation Plan* in 2014, and is now moving forward with its implementation. The Plan outlines phased redevelopment of Hitch Village (which was demolished in 2010) and renovation of Fred Wessels apartments into a 600-unit mixed-income community that continues Historic

Savannah's street grid. Former Hitch Village residents, who were relocated prior to its demolition, will have the right of first refusal for the newly-constructed homes.

Finally, the City recently undertook a planning effort for redevelopment of an area that includes the Yamacraw Village neighborhood. Completed in December 2015, the *West Downtown Urban Redevelopment Plan* outlined goals of: (1) transforming abandoned industrial plants, underutilized commercial properties, and public housing into a vibrant commercial and residential neighborhood; (2) creating new employment opportunities; (3) using public revenue to fund new infrastructure; (4) obtain an Opportunity Zone designation from the Georgia Department of Community Affairs; and (5) provide local incentives to encourage private investment that addresses blighted and underutilized parcels.

While not located in a current or past R/ECAP, the City of Savannah also made a place-based investment at Savannah Gardens by using Neighborhood Stabilization Program (NSP) funds to purchase and demolish Strathmore Estates, a 380-unit rental community that had become substandard. Mercy Housing and CHSA Development partnered to redevelop the site into a mixed-income community with 115 units of affordable apartments and a large public park. The redevelopment used Low Income Housing Tax Credits and HUD Section 202 (Supportive Housing for the Elderly) program funds.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Location and type of affordable housing
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Impediments to mobility
- Deteriorated and abandoned properties

iii. Disparities in Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics. Average index values by race and ethnicity for the city of Savannah, the Savannah MSA, and populations within each area living in poverty are provided in Table 5. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others.

Table 5. Opportunity Indicators by Race/Ethnicity

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
City of Savannah Total Population							
White, Non-Hispanic	39.91	40.53	46.86	53.95	47.40	57.00	48.62
Black, Non-Hispanic	24.37	29.65	29.06	58.47	46.88	46.90	43.27
Hispanic	32.02	33.86	38.26	53.15	47.45	60.07	50.67
Asian or Pacific Islander, Non-Hispanic	36.95	35.43	42.93	54.73	48.40	58.89	48.96
Native American, Non-Hispanic	32.54	30.30	37.75	54.68	47.50	52.05	46.98
City of Savannah Population Below Federal Poverty Line							
White, Non-Hispanic	31.71	38.71	41.51	61.78	53.50	56.20	44.38
Black, Non-Hispanic	19.33	29.65	26.40	63.46	51.17	48.18	40.37
Hispanic	30.88	28.34	31.80	56.41	49.56	57.38	49.09
Asian or Pacific Islander, Non-Hispanic	35.47	39.27	49.21	60.71	53.47	62.33	44.94
Native American, Non-Hispanic	51.06	27.19	60.39	75.55	73.00	72.63	31.21
Savannah MSA Total Population							
White, Non-Hispanic	56.09	56.66	56.66	34.10	25.95	48.74	57.88
Black, Non-Hispanic	32.55	36.31	37.30	49.24	38.83	48.66	48.93
Hispanic	43.69	45.37	48.69	40.55	33.24	57.26	55.13
Asian or Pacific Islander, Non-Hispanic	51.75	47.27	56.66	40.67	32.74	55.42	55.79
Native American, Non-Hispanic	45.73	46.83	47.92	39.33	31.44	50.08	54.97
Savannah MSA Population Below Federal Poverty Line							
White, Non-Hispanic	45.63	52.35	50.51	42.74	33.95	51.36	53.30
Black, Non-Hispanic	22.03	33.42	30.54	57.19	45.17	49.07	43.64
Hispanic	36.08	35.28	34.80	48.29	40.90	58.16	49.85
Asian or Pacific Islander, Non-Hispanic	47.80	43.54	54.79	48.35	40.32	55.39	52.36
Native American, Non-Hispanic	53.26	40.54	57.56	46.58	37.42	59.11	52.16

Sources: Decennial Census; ACS; Great Schools; Common Core Data; SABINS; LAI; LEHD; NATA

1. Analysis

a. Educational Opportunities

i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The maps on the following pages show HUD-provided opportunity scores related to education for Savannah's block groups, along with the demographic indicators of race/ethnicity, national origin, and family status. This school proficiency index is calculated based on performance of 4th grade students on state exams. It relies on attendance zones, if available, and otherwise calculates proficiency based on the performance of elementary schools within 1.5 miles of a block group's residents. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

In the city of Savannah, non-Hispanic White residents have the highest average school proficiency index value at 40.53. Index values for minority groups range from 29.65 for African Americans to 35.43 for Asians. These disparities persist even when controlling for income. Looking only at persons living below the federal poverty line, non-Hispanic Whites live in neighborhoods with an average school proficiency index score of 38.71 compared to 29.65 for African Americans and 28.34 for Hispanics.

School proficiency index scores are higher at the regional level than in the city for all racial/ethnic groups regardless of income. However, the average non-Hispanic White person still lives in a neighborhood with a better school proficiency index score than the average person of color. White residents live in neighborhoods with an average score of 56.66, compared to 36.31 for African Americans and 45.37 for Latinos; for residents below the poverty line these scores were lower at 52.35, 33.42, and 35.28, respectively.

To summarize, White non-Latino residents tend to live in neighborhoods with higher school proficiency than minority groups at both the municipal and regional level, regardless of income. Neighborhoods outside of Savannah also tend to have better elementary school educational opportunity than those within the city.

ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Figure 9 displays block group school proficiency scores along with population distribution by race and ethnicity. Within the city of Savannah, highest (most favorable) scores are in the area roughly bounded by Bull Street, Victory Drive, Waters Avenue, and DeRenne Avenue. This area includes the Abercorn Heights/Lamara Heights/Ridegwood/Poplar Heights, Ardmore/ Gould Estates/Olin Heights, and Ardsley Park/Chatham Crescent neighborhoods, which are primarily White. Portions of the city with a high concentration of African American residents – specifically to the east and west of downtown and midtown – tend to have lower scores. Neighborhoods in the south, which are somewhat integrated, also have lower scores. Highest scores are in suburban locations including Wilmington Island and areas south of the city.

Turning to Figure 10, nearly all concentrations of foreign-born populations occur in areas with low school proficiency scores – most notably, in the Leeds Gate, Oakhurst, Lundhurst, and Paradise Park neighborhoods of southern Savannah. A concentration of Mexican-born residents in Liberty City/Summerside/Southover/Richfield also live in an area of low school proficiency.

Several block groups with high concentrations of families with children (Figure 11) are in areas with low school proficiency. Specifically, these areas include the Leeds Gate, Oakhurst, Lundhurst, and Paradise Park neighborhood cluster, Cuyler-Brownville, and Hitch Village. Yamacraw Village includes a high share of families with children and has a moderate score. The Abercorn Heights, Ardmore, and Ardsley Park neighborhood clusters where school proficiency is high tend to have a somewhat lower-to-medium share of households with children in comparison to other areas in the city.

iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

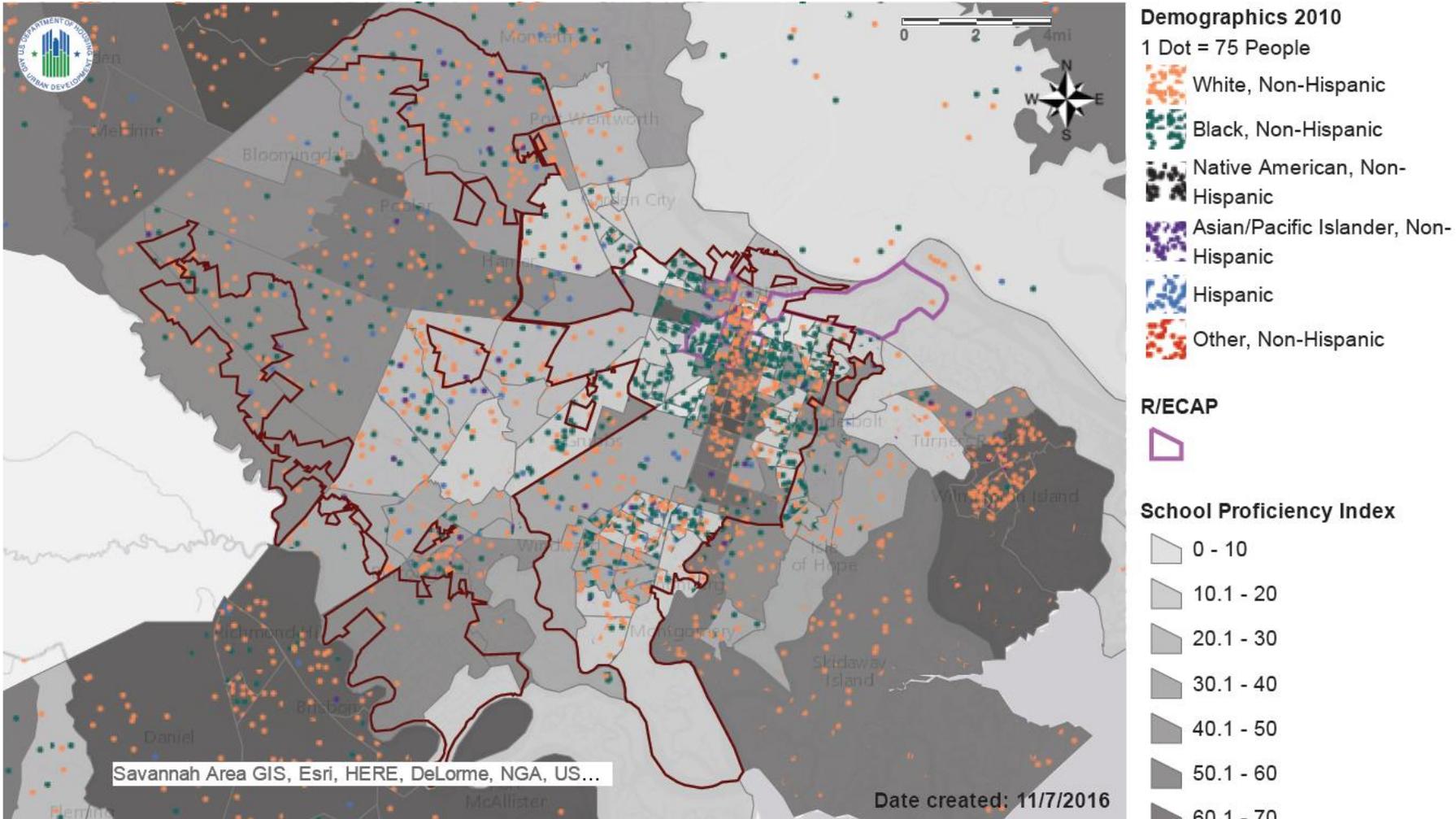
The city of Savannah and Chatham County are served by a unified school district with 26 elementary schools, 9 middle schools, 11 high schools, and 9 K-8 schools. This list includes two Montessori schools, two schools for the visual and performing arts, a STEM school, and two high schools where students can choose a career track such as small business, food and nutritional science, or law and criminal justice.

The district outlines elementary school attendance zones based on address, with each elementary school feeding in to specific middle and high schools. However, under Georgia House Bill 251, students may transfer to another public school within the district provided it has adequate classroom space after all assigned students are enrolled. If more transfer requests are received than space is available, the district uses a lottery system to approve requests. The parents or guardians of students who transfer are then responsible for all transportation to the new school. All students must apply for enrollment in the Montessori schools, the arts schools, the STEM school, and Savannah Early College High School.

Schools available for transfer requests include 8 elementary schools, 3 K-9 schools, 5 middle schools, and 6 high schools. Comparing the locations of these 8 elementary schools with the school proficiency score maps shows that those in and around central Savannah tend to be in areas with low proficiency scores. Elementary school transfer options in Chatham County outside of Savannah tend to score in the mid to high range.

Overall, the maps and average scores show that African Americans are least successful in accessing proficient schools both in the city and county and in poverty and at all income levels. Differences in average school proficiency scores between African Americans and non-Latino Whites were around 10 points in the city and 20 points in the region.

Figure 9. School Proficiency Index and Race/Ethnicity in the City of Savannah



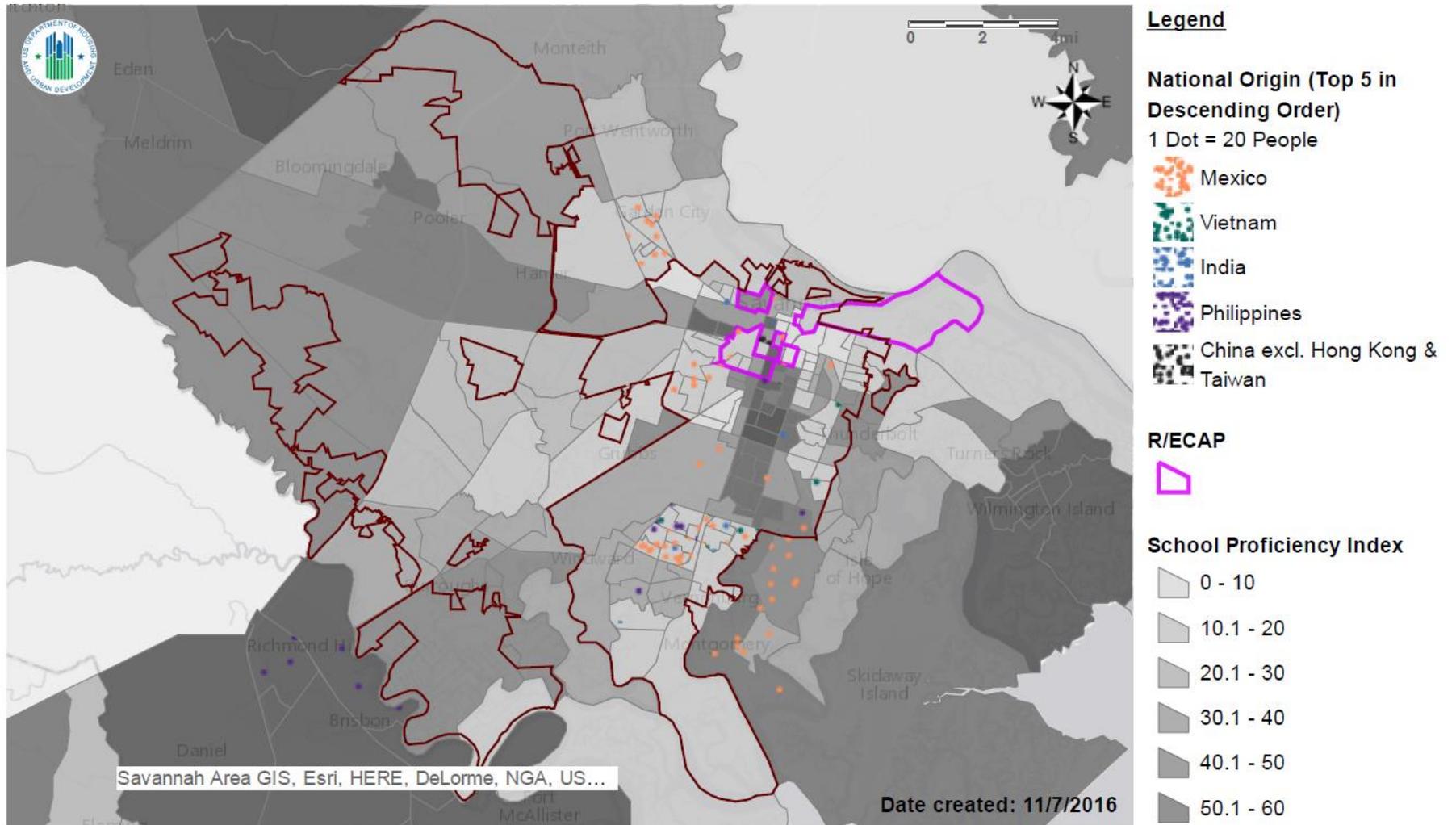
Name: Map 9 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 10. School Proficiency Index and National Origin in the City of Savannah



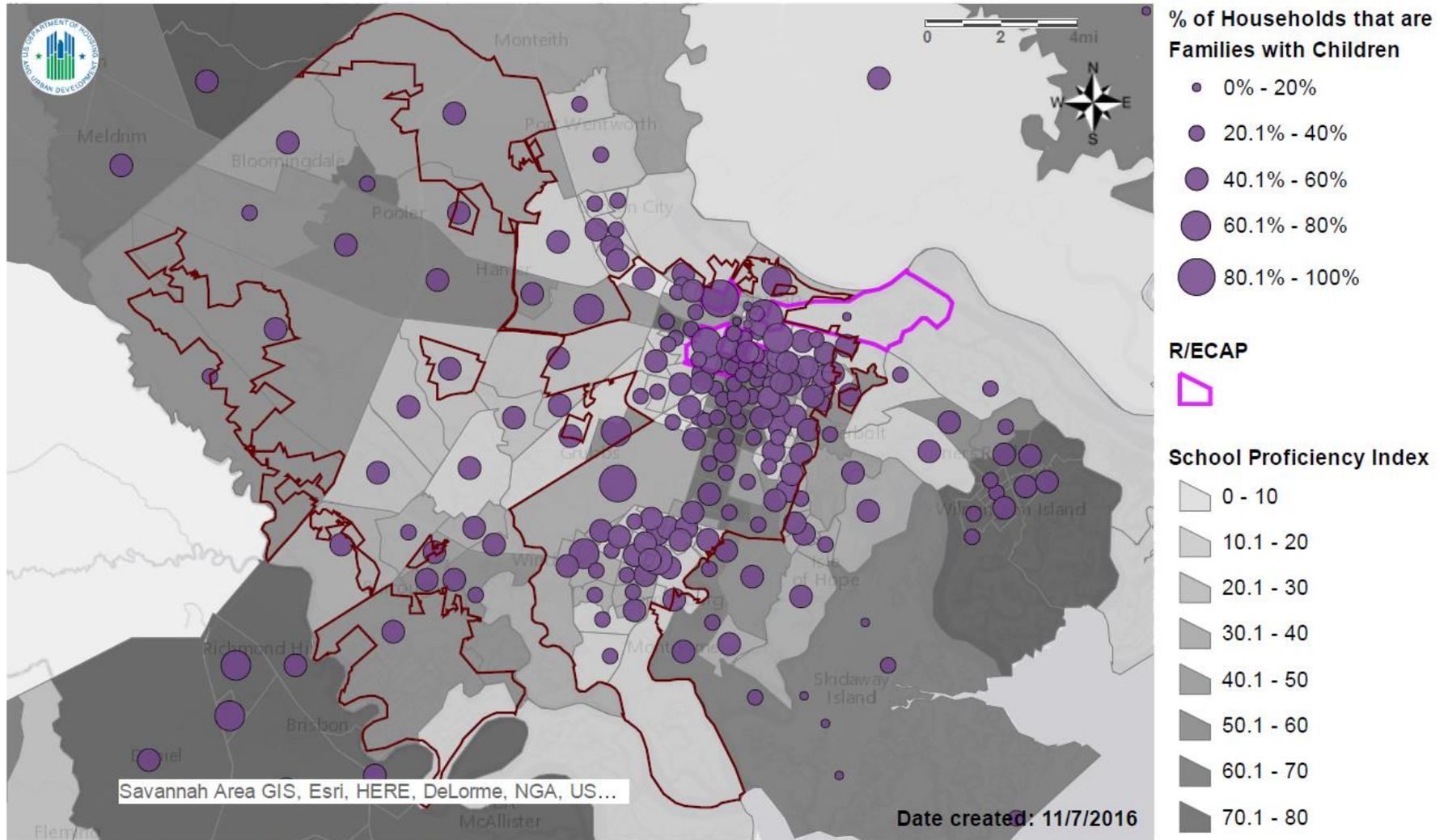
Name: Map 9 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 11. School Proficiency Index and Households with Children in the City of Savannah



Name: Map 9 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

b. Employment Opportunities

i. Describe any disparities in access to jobs and labor markets by protected class groups.

Table 5 and Figure 12 through Figure 17 provide data regarding access to jobs and labor markets by race and ethnicity, national origin, and familial status. The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Looking at jobs proximity, average index values are roughly equivalent for non-Hispanic Whites, Hispanics, and Asians, ranging from 57.00 to 60.07. African Americans have a lower average score at 46.90. Poverty status does not appear to have a negative impact on access to job locations and, in fact, jobs proximity index values are higher for some populations below the federal poverty line. Poor African Americans, Asians, and Native Americans all tend to live closer to jobs than their populations at large. Poor Whites live in neighborhoods with an average score of 56.20, below that of Hispanic, Asian, and Native American residents.

Looking at regional scores shows that the Latino population tends to live in areas with some of the best access to jobs, regardless of income. Index values range from 48.66 for African Americans to 57.26 for Latinos. Jobs access scores for those in poverty are equal or better than scores for the population as a whole. Overall, regional figures are not an improvement over city scores, suggesting that a housing location within Savannah will likely offer residents superior access to job centers in comparison to the county. This dynamic may be particularly important for transit-dependent households.

In terms of labor market engagement, non-Latino Whites in Savannah live in neighborhoods with an average index value of 46.86, followed by Asians at 42.93. African Americans live in neighborhoods with the lowest average score (29.06). For White, Black, and Latino persons in poverty, average labor market index scores are lower than for the population as a whole, falling by 3-6 points. In contrast, poor Asians and Native Americans tend to live in neighborhoods with higher scores than their entire populations.

For every group except poor Native Americans, labor market indices were higher at the regional level than in the city. Gaps between average neighborhood scores for White residents and Black, Latino, and Asian residents remained roughly constant.

Together the jobs proximity index and labor market engagement index show that while the regional population tends to be more engaged with the labor market, their access to jobs is worse. Poor persons in the city and region tend to live in areas with as good or better access to jobs than the population as a whole, perhaps because limited transportation budgets restrict the areas in which they look for housing to those that offer shorter commutes to job centers.

ii. How does a person's place of residence affect their ability to obtain a job?

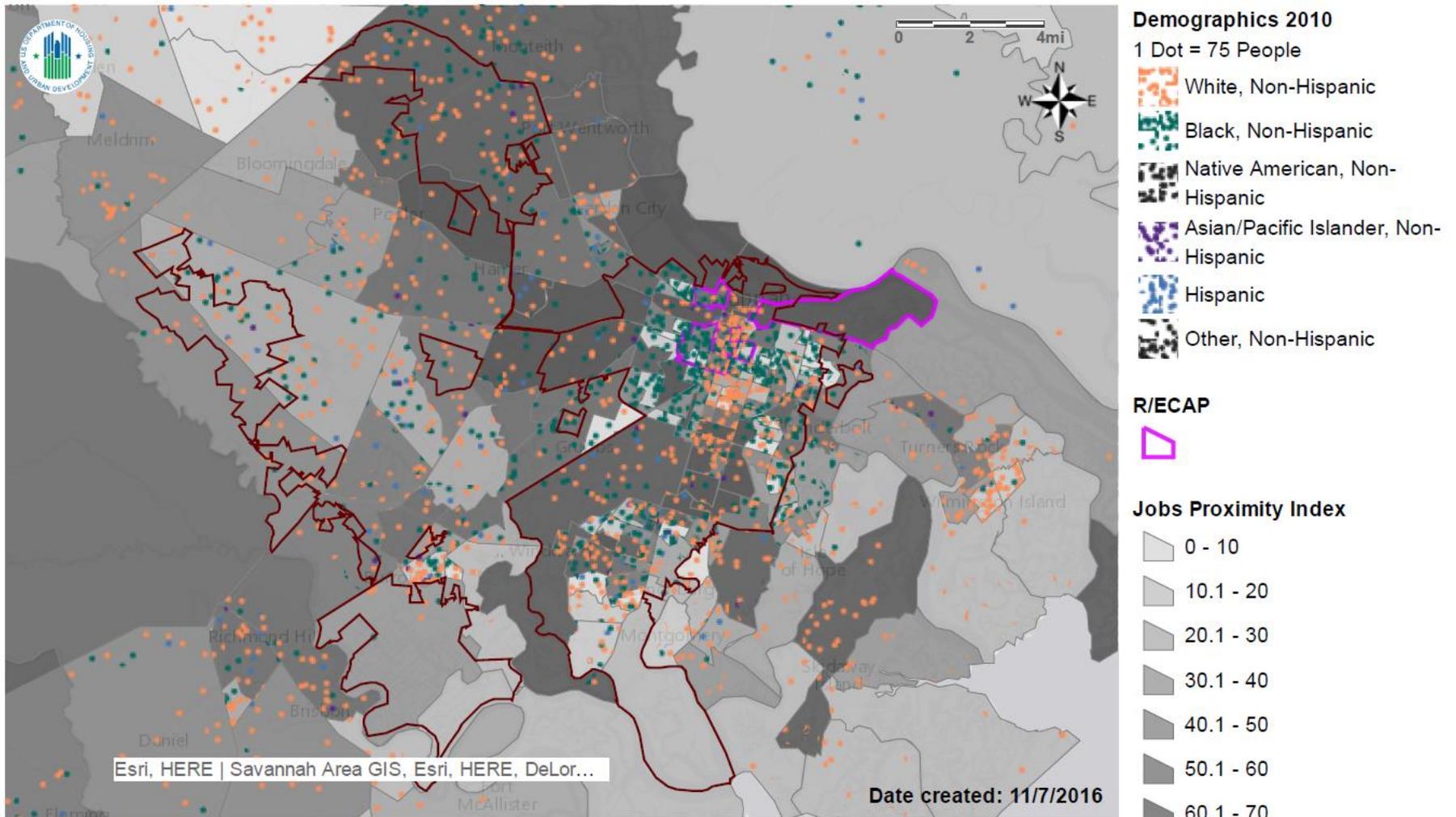
While neither employment index gauges Savannah residents' ability to obtain jobs, job proximity is likely to have an impact on employment opportunities, especially for low and moderate wage workers whose ability to afford transportation may be more constrained. For those who are transit dependent, living near a bus route which connects easily to job centers with employment opportunities that match their skill set is crucial. For someone living in the city, a job in suburban areas may require long bus rides or multiple transfers if accessible by transit at all. Persons with disabilities may also see their employment opportunities limited by bus or paratransit service. Reduced routes on weekends and weekday evenings can also affect riders' ability to take second or third shift jobs.

For low and moderate wage workers with personal automobiles, transportation costs may also affect job opportunities. Parking, fuel costs, and maintenance costs due to wear and tear on older cars can limit the distance employees are able to commute to work, and thus affect their ability to apply for jobs further from their residence.

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

The labor market engagement and jobs proximity index show that in the city of Savannah, African Americans are least successful in accessing employment. They live in neighborhoods that have, on average, a 10-point gap in job proximity and a 17-point gap in labor market engagement when compared to Whites. These gaps remain but lessen slightly when looking at persons in poverty. The average poor African American person lives in a neighborhood with a job proximity score that is 8 points below that of the average poor White person; for labor market engagement, there is a 15-point gap.

Figure 12. Jobs Proximity Index and Race/Ethnicity in the City of Savannah



Name: Map 10 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 13. Labor Market Index and Race/Ethnicity in City of Savannah

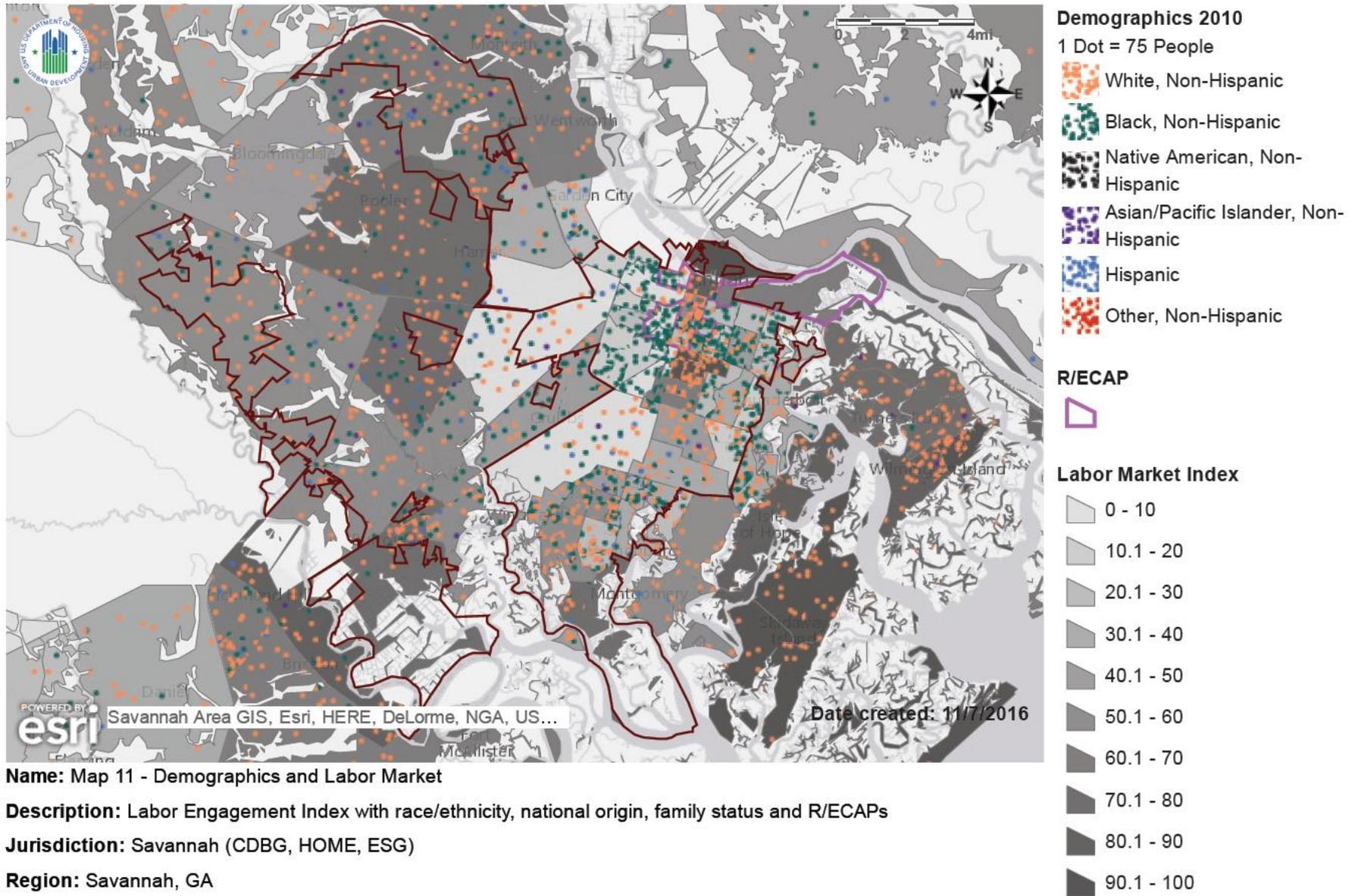
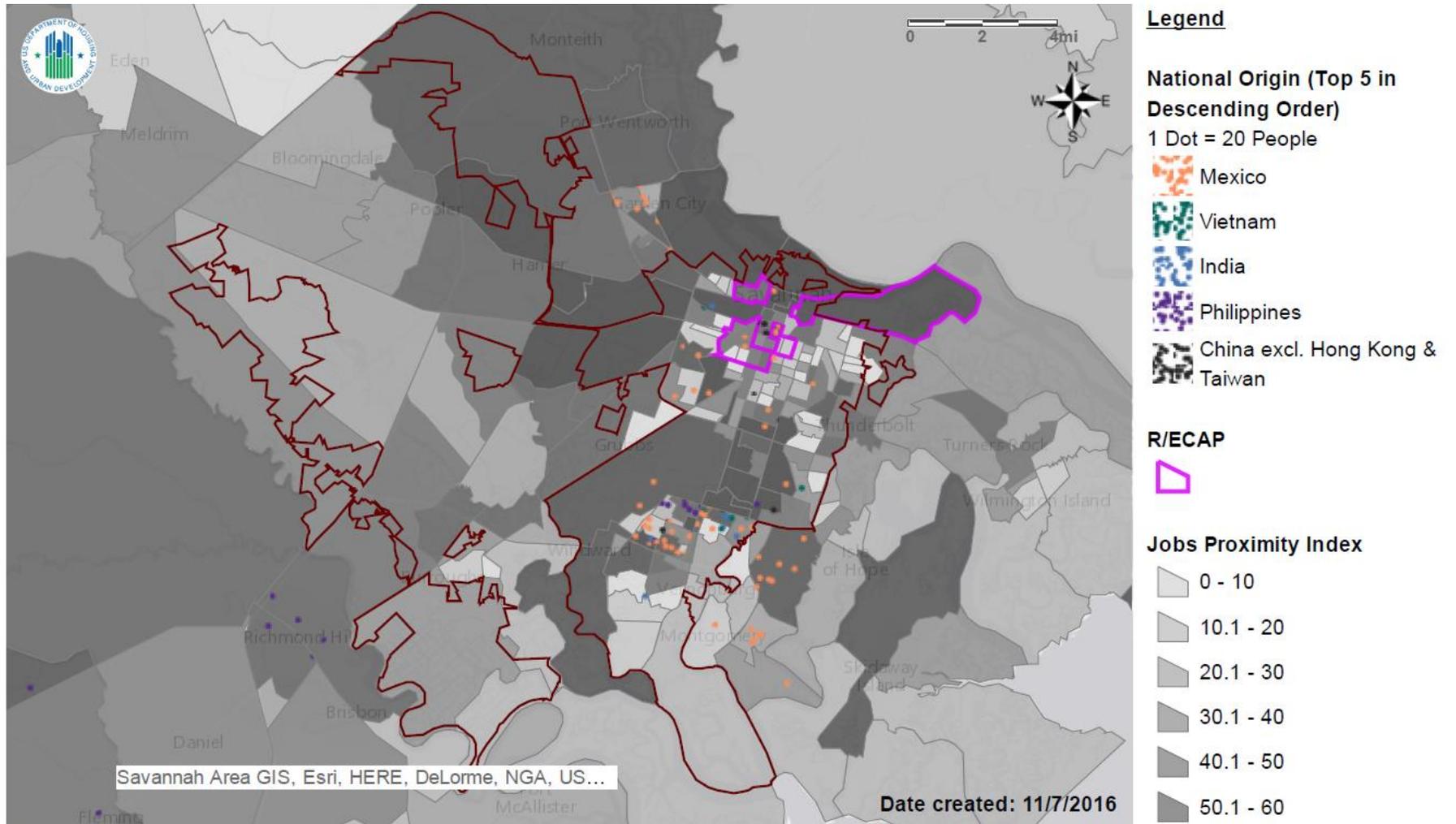


Figure 14. Jobs Proximity Index and National Origin in the City of Savannah



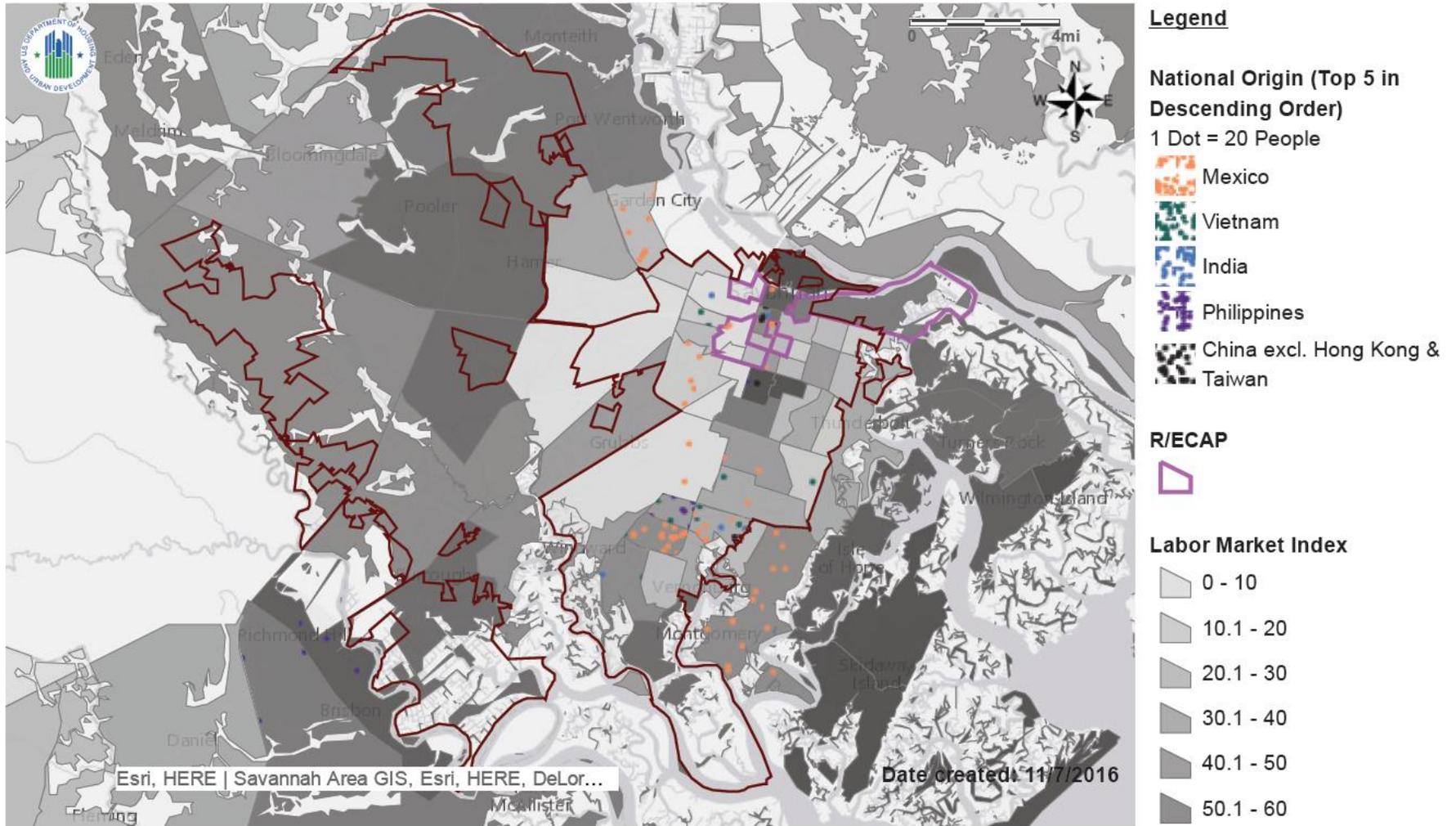
Name: Map 10 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 15. Labor Market Index and National Origin in the City of Savannah



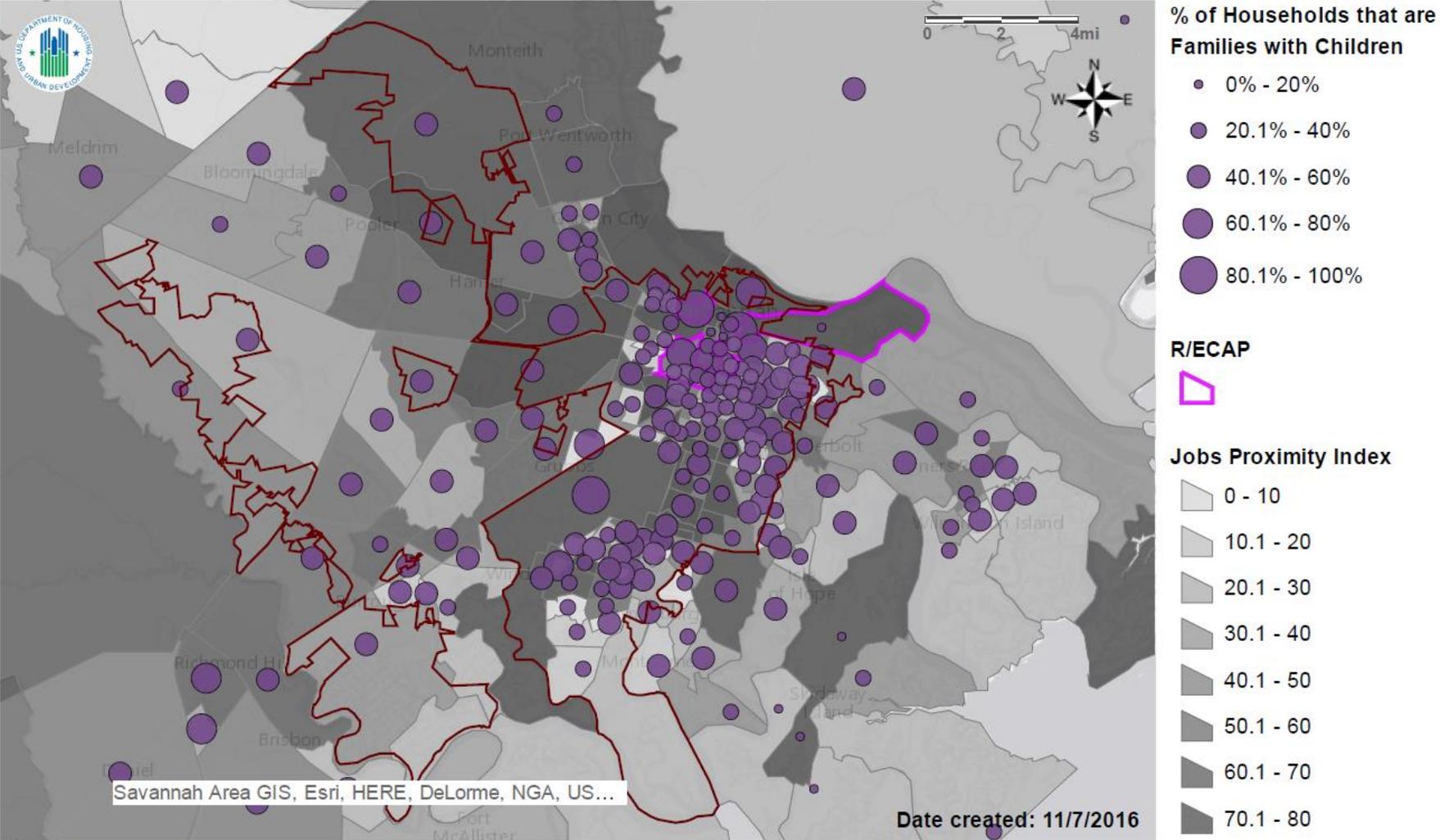
Name: Map 11 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 16. Jobs Proximity Index and Households with Children in the City of Savannah



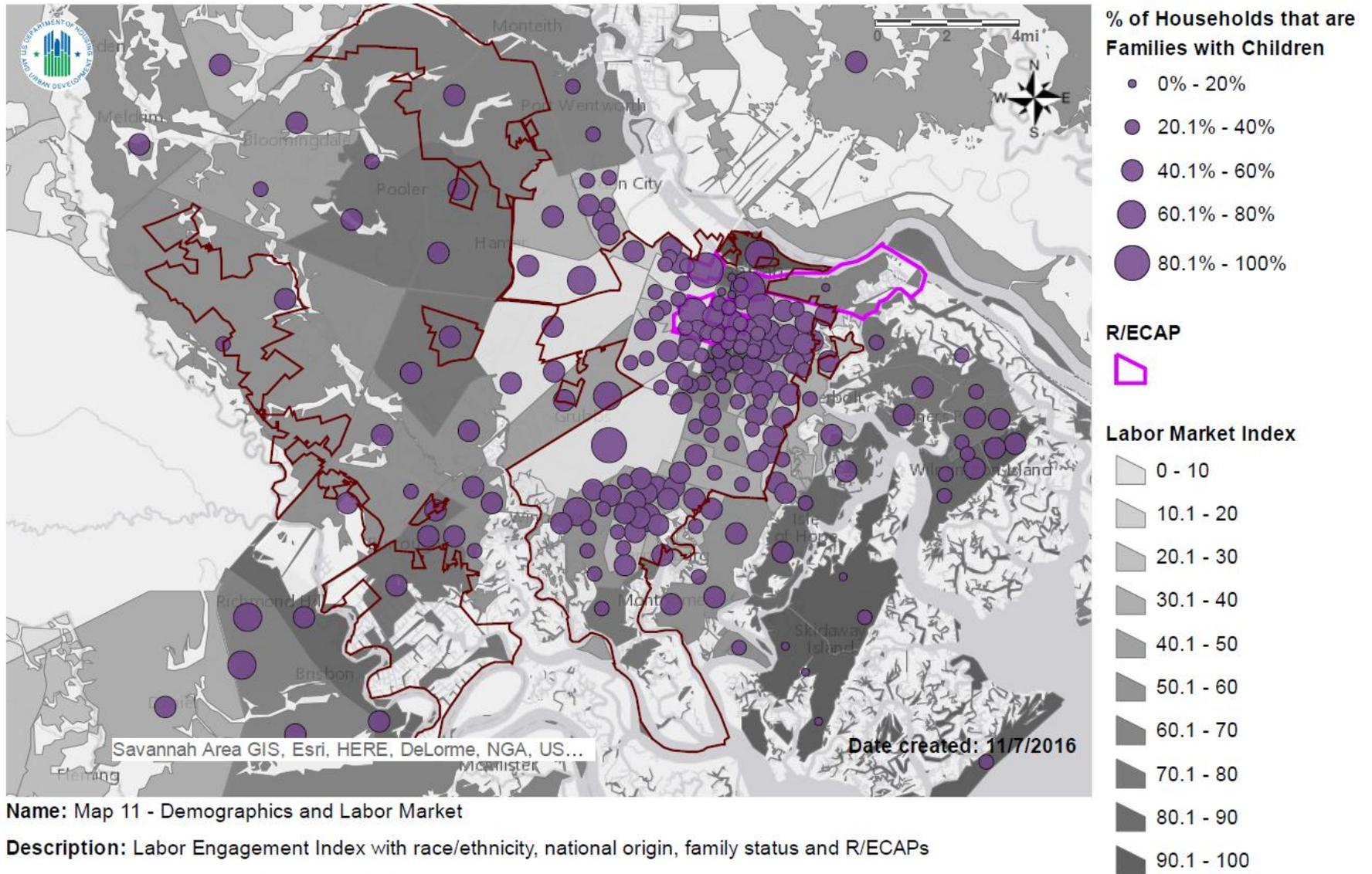
Name: Map 10 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 17. Labor Market Index and Households with Children in the City of Savannah



Name: Map 11 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

c. Transportation Opportunities

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

Table 5 and Figure 18 through Figure 23 provide data regarding access to transit and transportation costs by race and ethnicity, national origin, and familial status. The Transit Trip Index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Transit trip index values show that minority population groups in Savannah live in neighborhoods where residents use transit at similar or higher rates than Whites. Regionally, minorities live in neighborhoods where residents use transit more frequently than Whites. In terms of transit costs and access, there is virtually no difference between index scores for any population segments in the city, falling between 46-49 for all groups. In the region, non-Hispanic Whites have poorer access to low cost transit than persons of color. This difference likely derives from the fact that the latter are more likely to live in the city where bus service is more accessible than in the less diverse suburban areas.

Not surprisingly, people living in the city are more likely to use transit than those in suburbs regardless of race, ethnicity, or income. In both the city and region, poor households live in neighborhoods where residents are more likely to use transit and where it is more accessible.

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Statistically, transit use, proximity, and cost is very similar for city of Savannah residents regardless of race and ethnicity. People living outside of Savannah in areas such as Pooler and Bloomingdale are less likely to both use transit and to live near low cost transit options.

iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

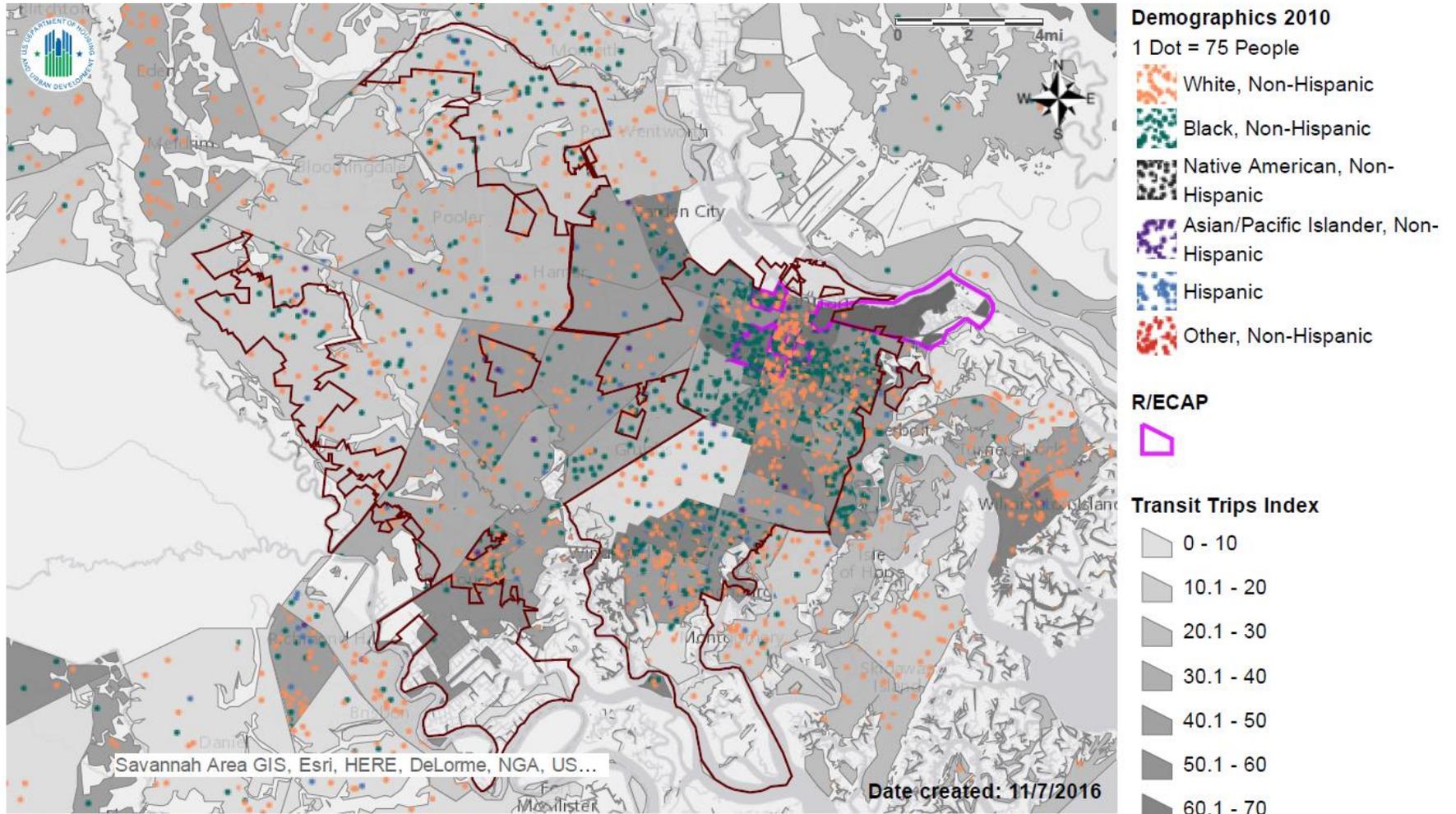
Chatham Area Transit (CAT) operates 16 bus routes that provide service in downtown, to south Savannah neighborhoods including Windsor Forest and Paradise Park, as far east as Wilmington Island, as far southwest as the I-95 and US-204 interchange, and as far northwest as the Savannah/Hilton Head International Airport and Georgia Tech's Savannah campus. According to CAT's published schedule, buses operate from 5:30 a.m. to 12:30 a.m. on Monday through Saturday and from 7:00 a.m. to 9:00 p.m. on Sunday. One-way bus fare is \$1.50, with a free transfer. Seniors and passengers with disabilities pay \$0.75, while children under 41 inches tall are free. Daily, weekly, and monthly passes can also be purchased. Free transit is also provided to limited locations within the downtown district. Reasonable fares, schedules that extend beyond a 9-5 workday, and routes that reach some

suburban and employment areas outside of the city all help to expand transit access to protected classes.

For persons with disabilities, CAT includes accessibility features on its fixed-route service such as kneeling buses, ramps that bridge to the curb, priority and wheelchair seating, permission to bring service animals aboard, and automated announcement systems. CAT also operates a paratransit service that provides door-to-door service for persons with disabilities who are unable to use fixed-route service. Customers must apply for this service and can be eligible for temporary, conditional, or unconditional use.

In addition to the fixed-route and paratransit services offered by Chatham Area Transit, Yellow Cab of Savannah operates five wheelchair accessible taxis through a contract with CAT. Regional rural public transit is provided as a general public transit service in Bryan, Bulloch, Camden, Chatham, Effingham, Glynn, Liberty, Long, McIntosh, and Screven Counties.

Figure 18. Transit Trips Index and Race/Ethnicity in the City of Savannah



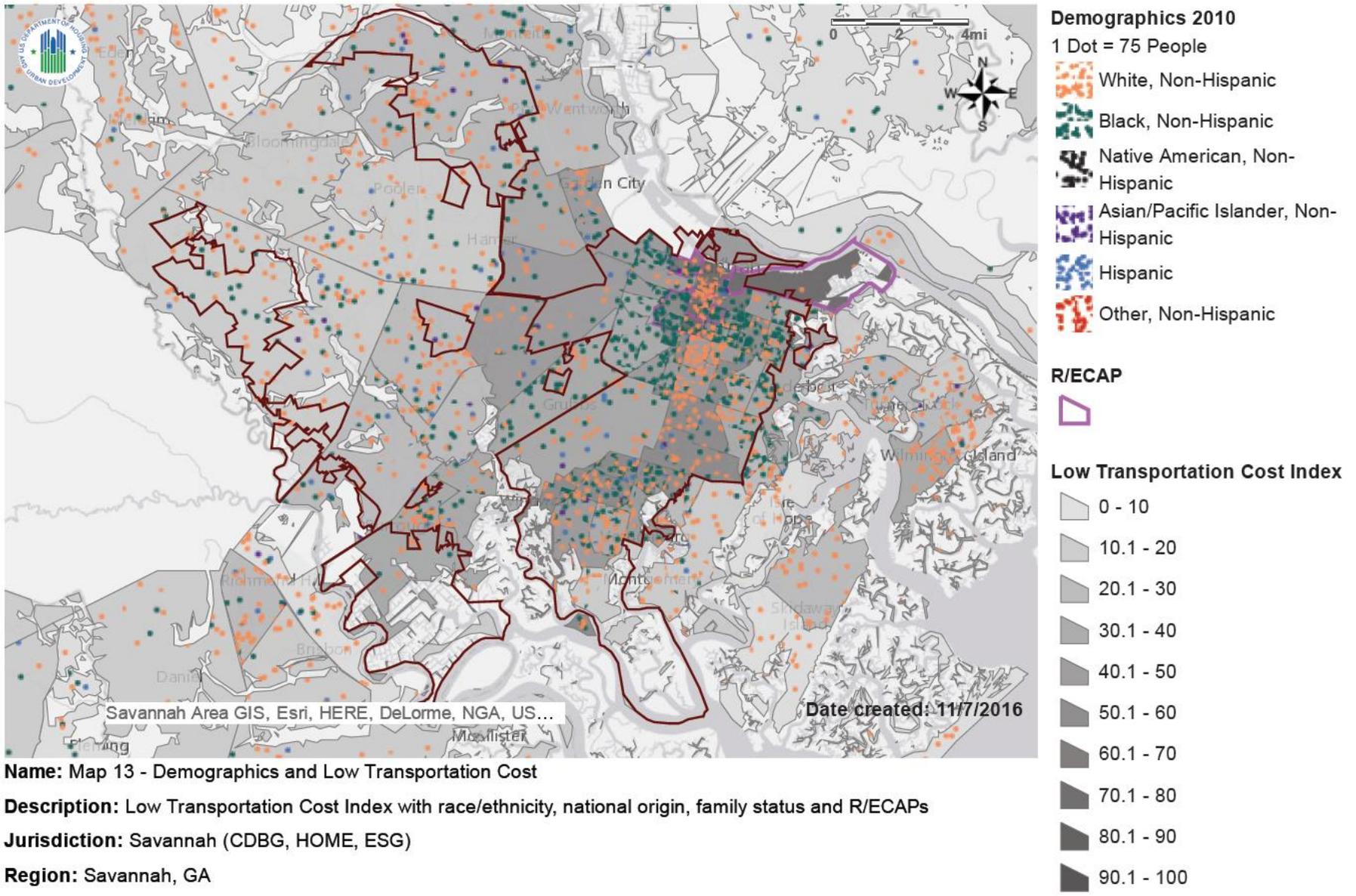
Name: Map 12 - Demographics and Transit Trips

Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 19. Low Transportation Cost Index and Race/Ethnicity in the City of Savannah



Name: Map 13 - Demographics and Low Transportation Cost

Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 20. Transit Trips Index and National Origin in the City of Savannah

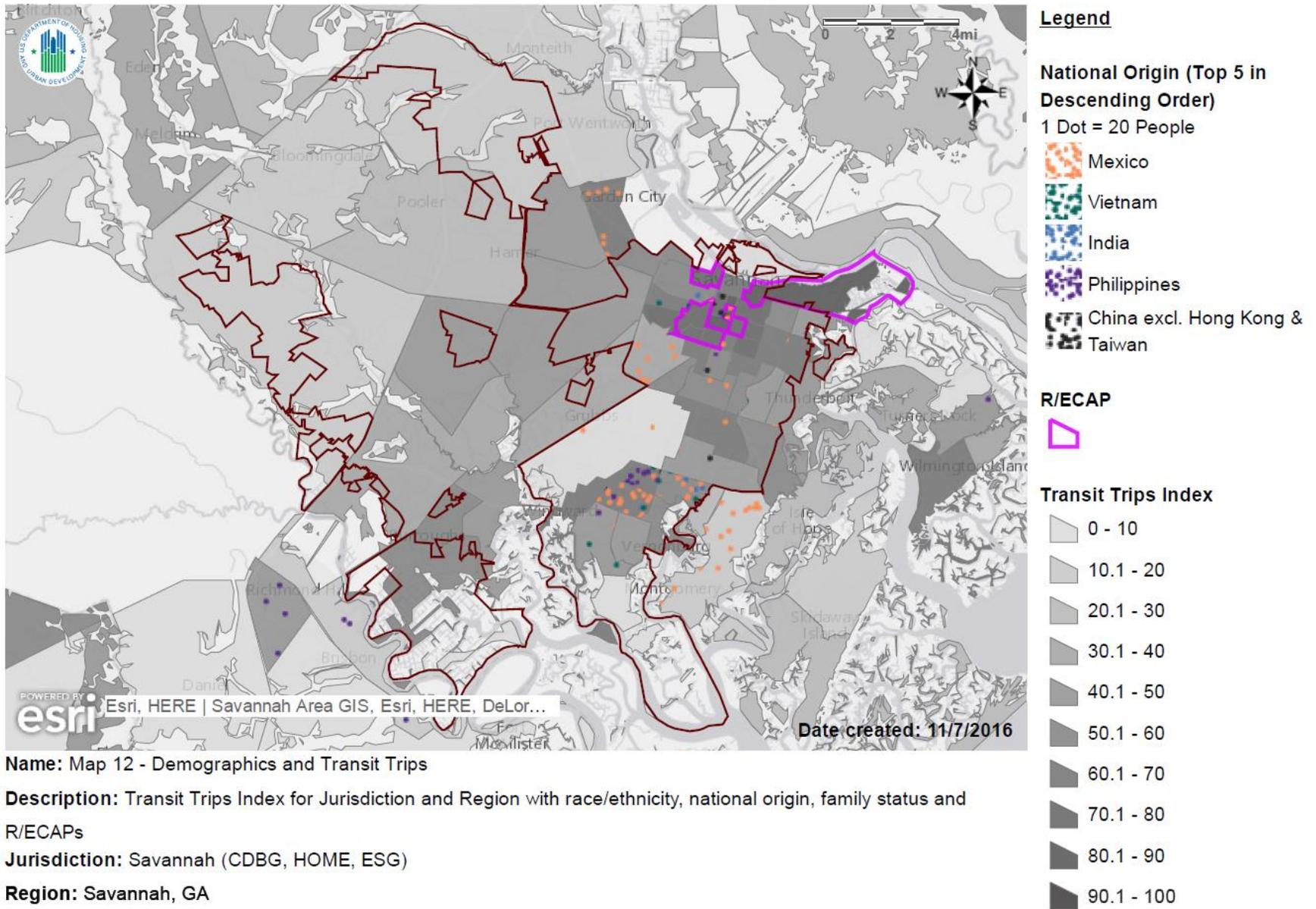
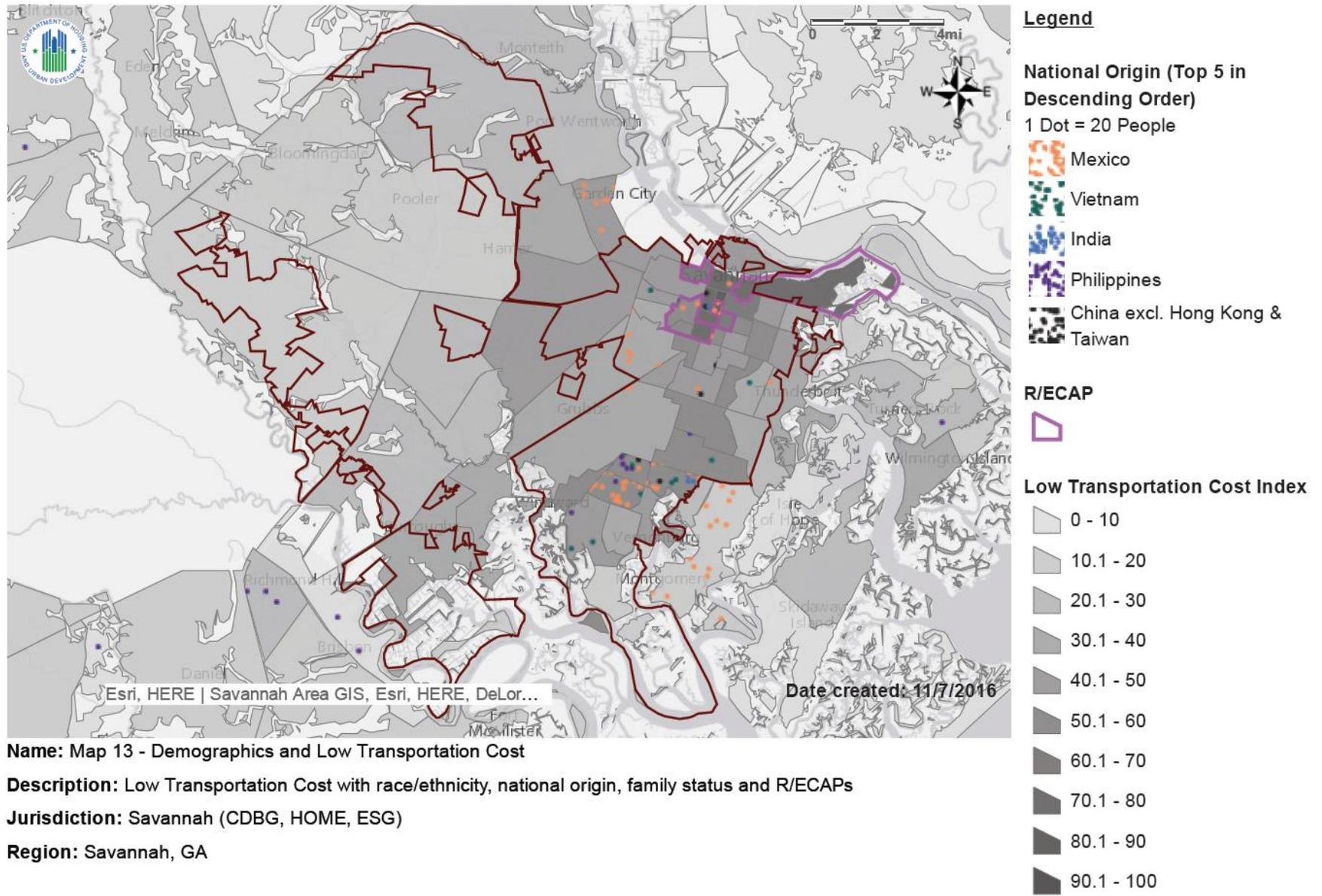


Figure 21. Low Transportation Cost Index and National Origin in the City of Savannah



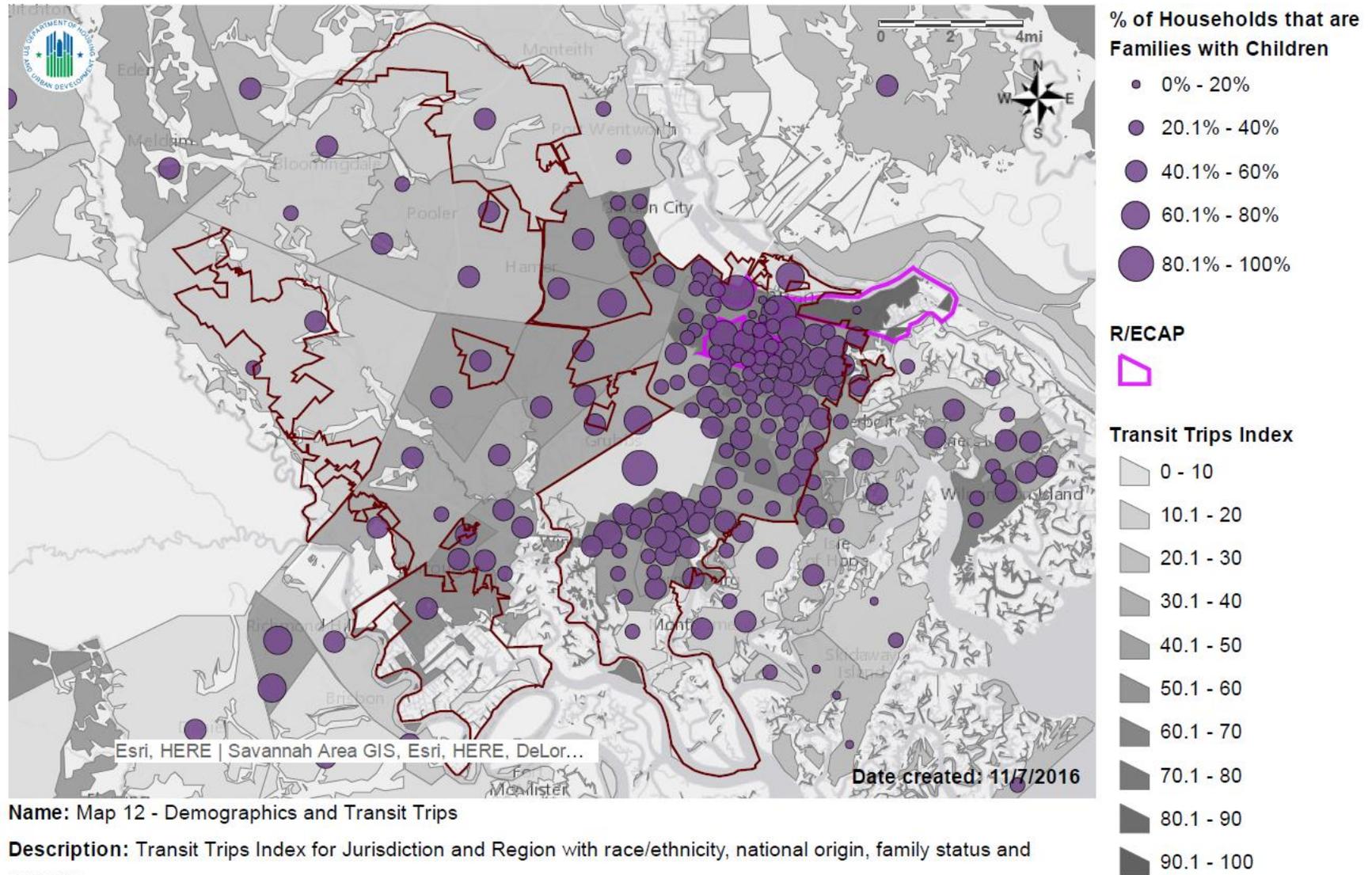
Name: Map 13 - Demographics and Low Transportation Cost

Description: Low Transportation Cost with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 22. Transit Trips Index and Households with Children in the City of Savannah



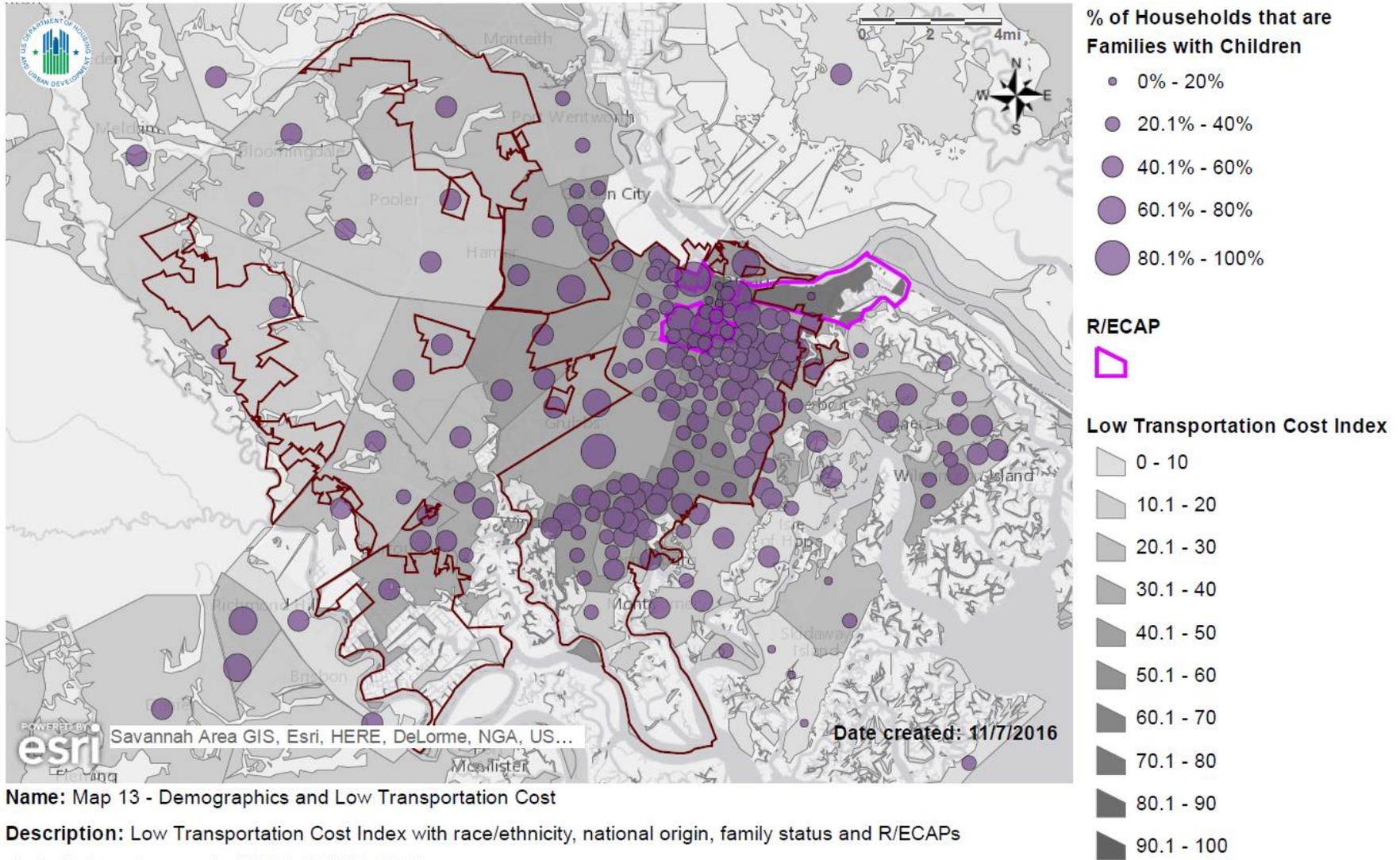
Name: Map 12 - Demographics and Transit Trips

Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 23. Low Transportation Cost Index and Households with Children in the City of Savannah



Name: Map 13 - Demographics and Low Transportation Cost

Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

d. Low Poverty Exposure Opportunities

i. Describe any disparities in exposure to poverty by protected class groups.

Table 5 and Figure 24 through Figure 26 provide data regarding poverty levels in the city and region. Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

On average, African Americans and other minority population segments live in areas with a higher exposure to poverty than do Whites. In the city of Savannah, Whites have a poverty index value of 39.91, compared to 24.37 for Blacks, 32.02 for Hispanics, 36.95 for Asians, and 32.54 for Native Americans. Poor African Americans are more likely to live in a neighborhood with high poverty (index score of 19.33) than poor Whites (31.71) or poor Hispanics (30.88).

Regionally, disparities in exposure to poverty persist. While Whites live in neighborhoods with an average score of 56.09, African Americans have an average of 32.55 and Hispanics of 43.69. As in the city, poor Whites within the region live in neighborhoods with less exposure to poverty (45.63) than do poor African Americans (22.03).

ii. What role does a person's place of residence play in their exposure to poverty?

The maps that follow indicate that a person's place of residence can have a strong impact on their exposure to poverty. Within the city, areas of highest poverty include the R/ECAP tracts that cover the Cuyler-Brownville, Yamacraw Village, and Hitch Village neighborhoods, along with other areas to the west of downtown. Hunter Army Airfield and several neighborhoods to its east have moderate poverty exposure. A few neighborhoods throughout the city have low poverty exposure, including the Historic District downtown, Ardmore and Oakdale neighborhoods in the center of the city, and the Windsor Forest and Village/Rio/Armstrong neighborhoods in the south. Suburban areas tend toward lower poverty exposure, with Skidaway and Wilmington Islands having some of the highest indicator values.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

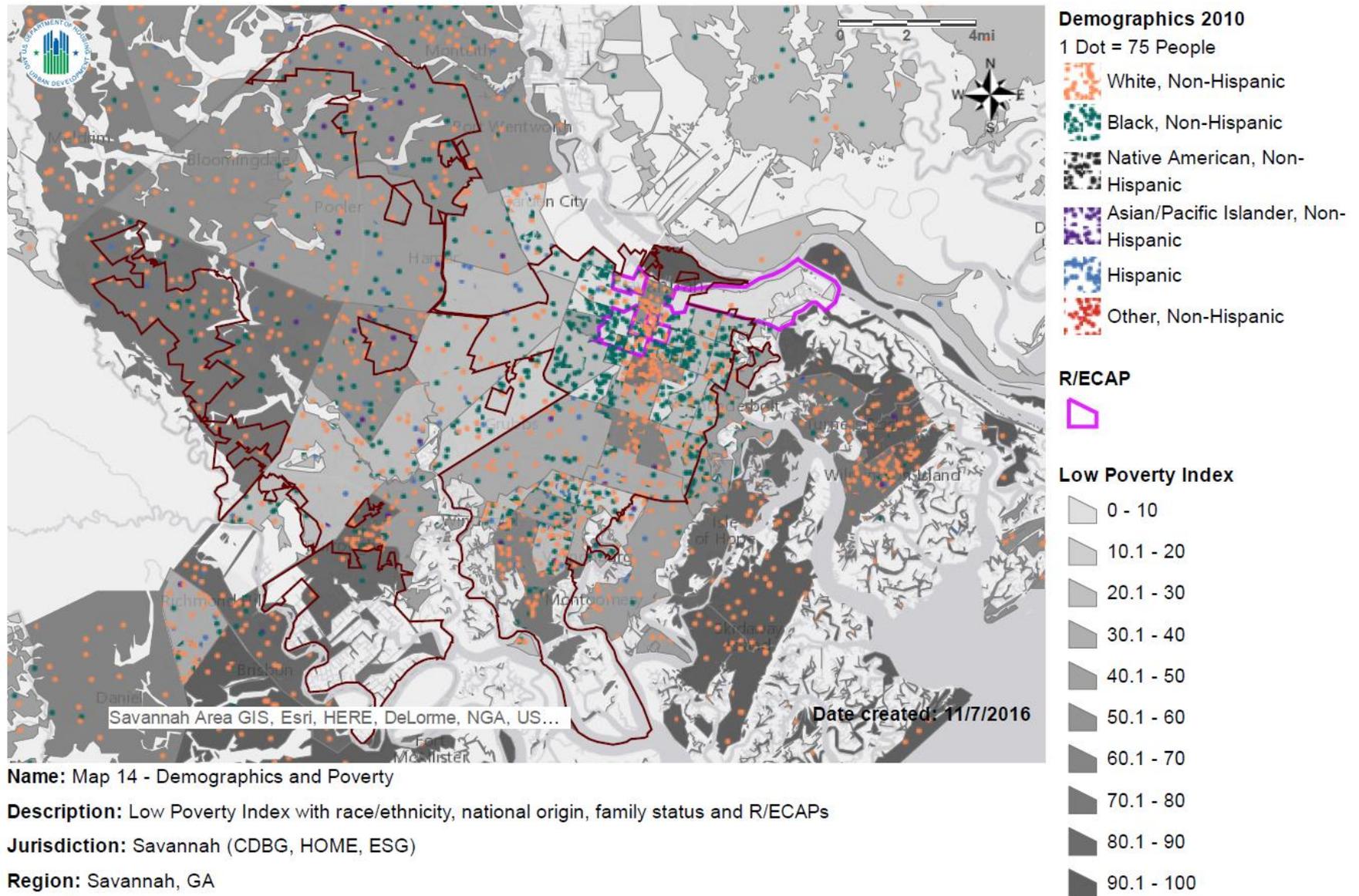
Poverty exposure index values are lowest (indicating exposure to higher poverty rates) for African American households. In the city of Savannah, there is a 15.54-point gap between poverty exposure scores for White and African American households; in the region, this gap expands to 23.54.

Figure 25 shows that foreign-born populations in Savannah tend to live in areas with moderately high exposure to poverty, particularly in the city's southeastern neighborhoods (Oakhurst, Leeds Gate, Lundhurst).

iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

The City of Savannah's Housing Department operates home purchase down payment assistance and home repair programs that are citywide and could be used by a low or moderate income household looking to move to or remain in a low poverty area. The City is also supportive of Low Income Housing Tax Credit applications that provide affordable rental housing in emerging neighborhoods annexed by the City, including New Hampstead and Godley Station. Both of these areas are west of I-95 and are being developed with housing and commercial employment opportunities.

Figure 24. Low Poverty Index and Race/Ethnicity in the City of Savannah



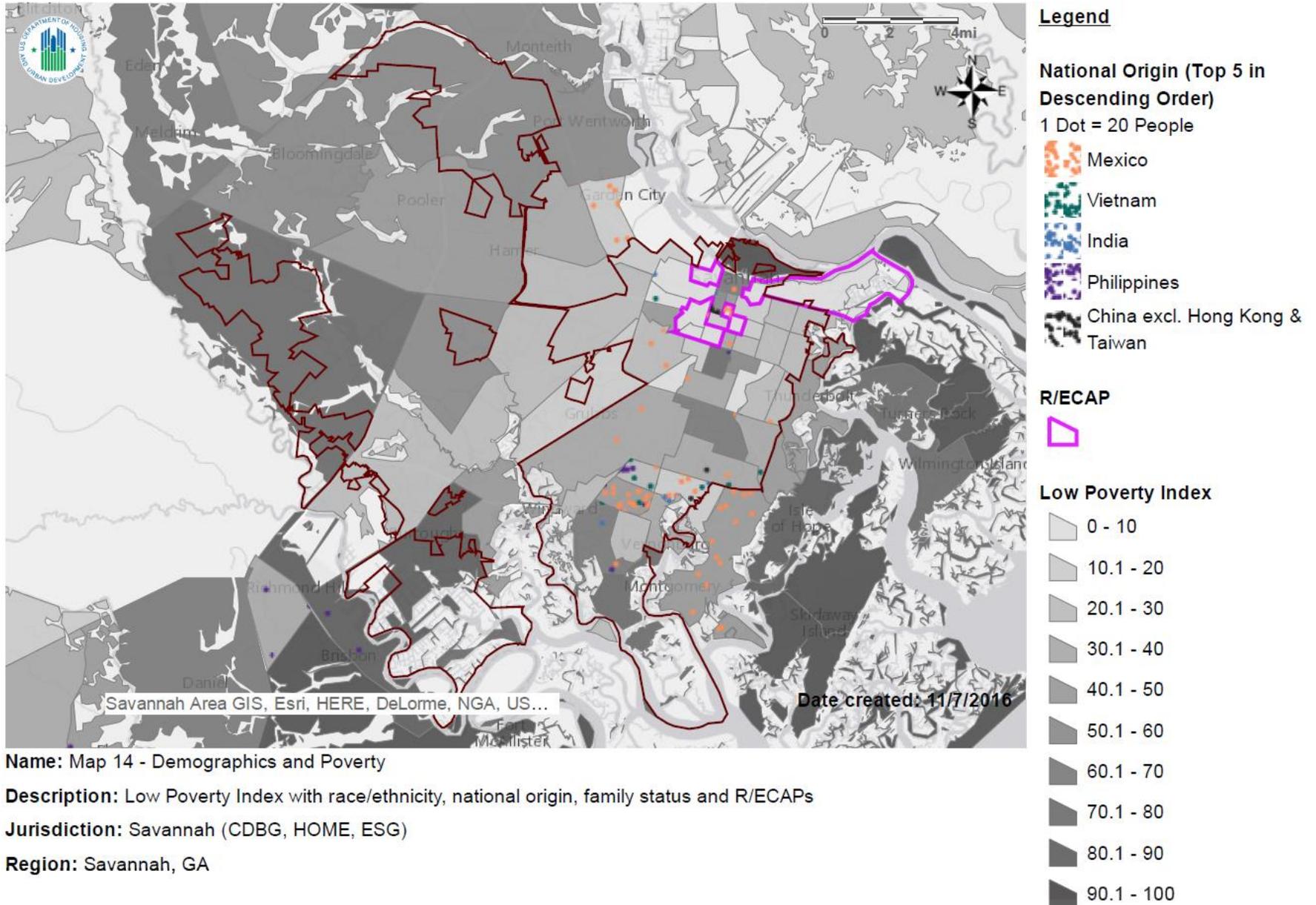
Name: Map 14 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 25. Low Poverty Index and National Origin in the City of Savannah



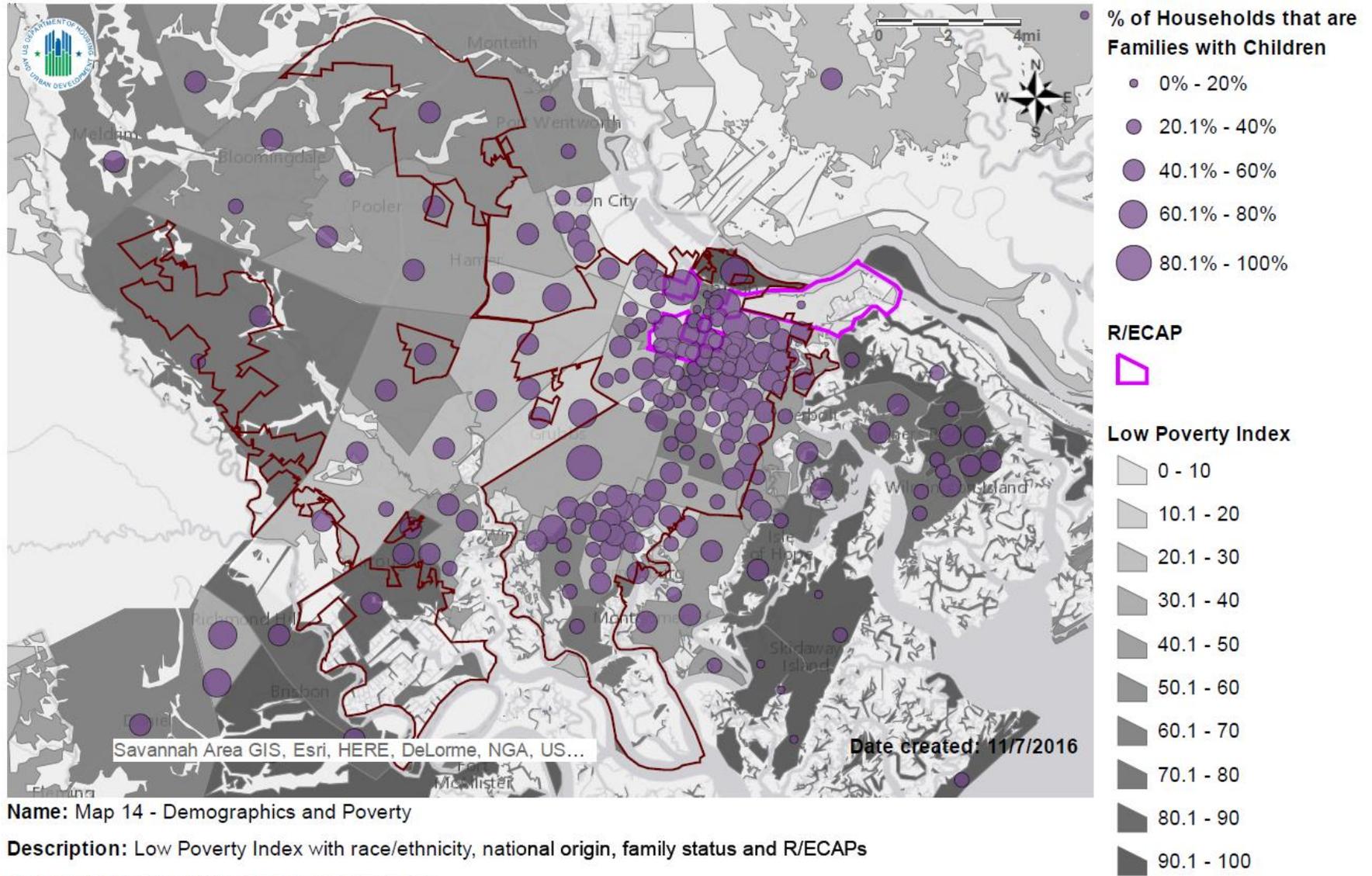
Name: Map 14 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 26. Low Poverty Index and Households with Children in the City of Savannah



Name: Map 14 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

Table 5 and Figures 27 through 29 provide data indicating levels of exposure to environmental health hazards. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

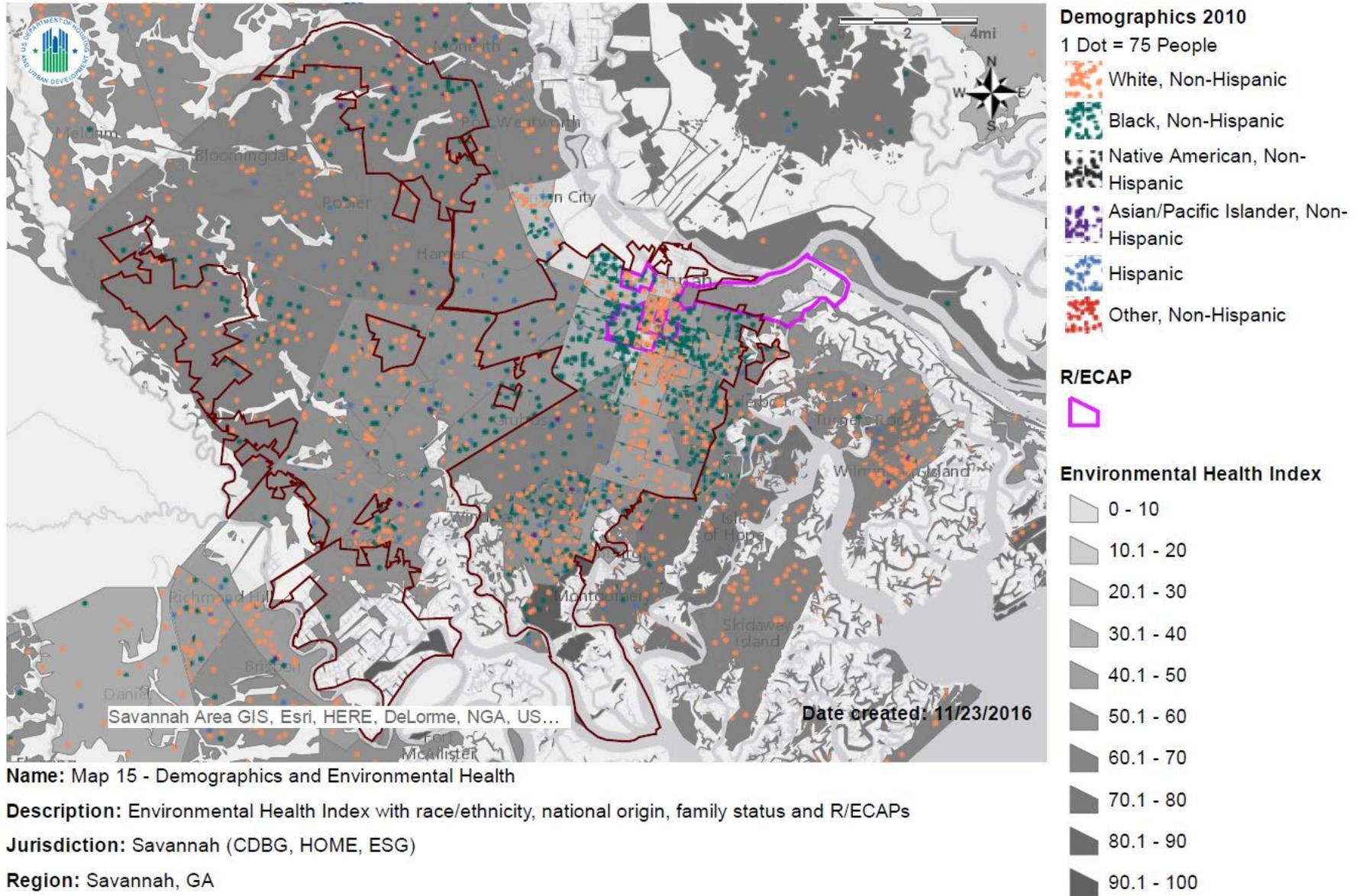
Overall, environmental health index scores show little variation in the city, ranging from 43.27 for African Americans to 50.67 for Asians. Persons in poverty had slightly lower scores which ranged from 31.21 for Native Americans to 49.09 for Asians.

Regional environmental health index scores are higher than citywide scores for every population group. However, disparities are also greater. African Americans in the MSA have an average index score of 48.93, compared to 57.88 for Whites. Disparities between Whites and other minority population segments range from 2 to 3 points.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

As Figures 27 through 29 show, environmental health hazards are highest in and near downtown Savannah and industrial areas around the river. Garden City census tracts along the Savannah River also have a low environmental health index score (and thus higher exposure levels). Moving south in Savannah, scores increase. Scores in suburban areas (Pooler, Bloomingdale, Port Wentworth, and others) are also high. Since they are more likely to reside around downtown and in central Savannah, African American residents have a somewhat higher exposure to environmental health hazards than Whites at the regional level. Savannah's immigrant population is primarily clustered in the southern portion of the city, where hazard levels are low. Some foreign-born residents, however, live in the central city or in Garden City where exposure is higher.

Figure 27. Environmental Health Index and Race/Ethnicity in the City of Savannah



Name: Map 15 - Demographics and Environmental Health

Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 28. Environmental Health Index and National Origin in the City of Savannah

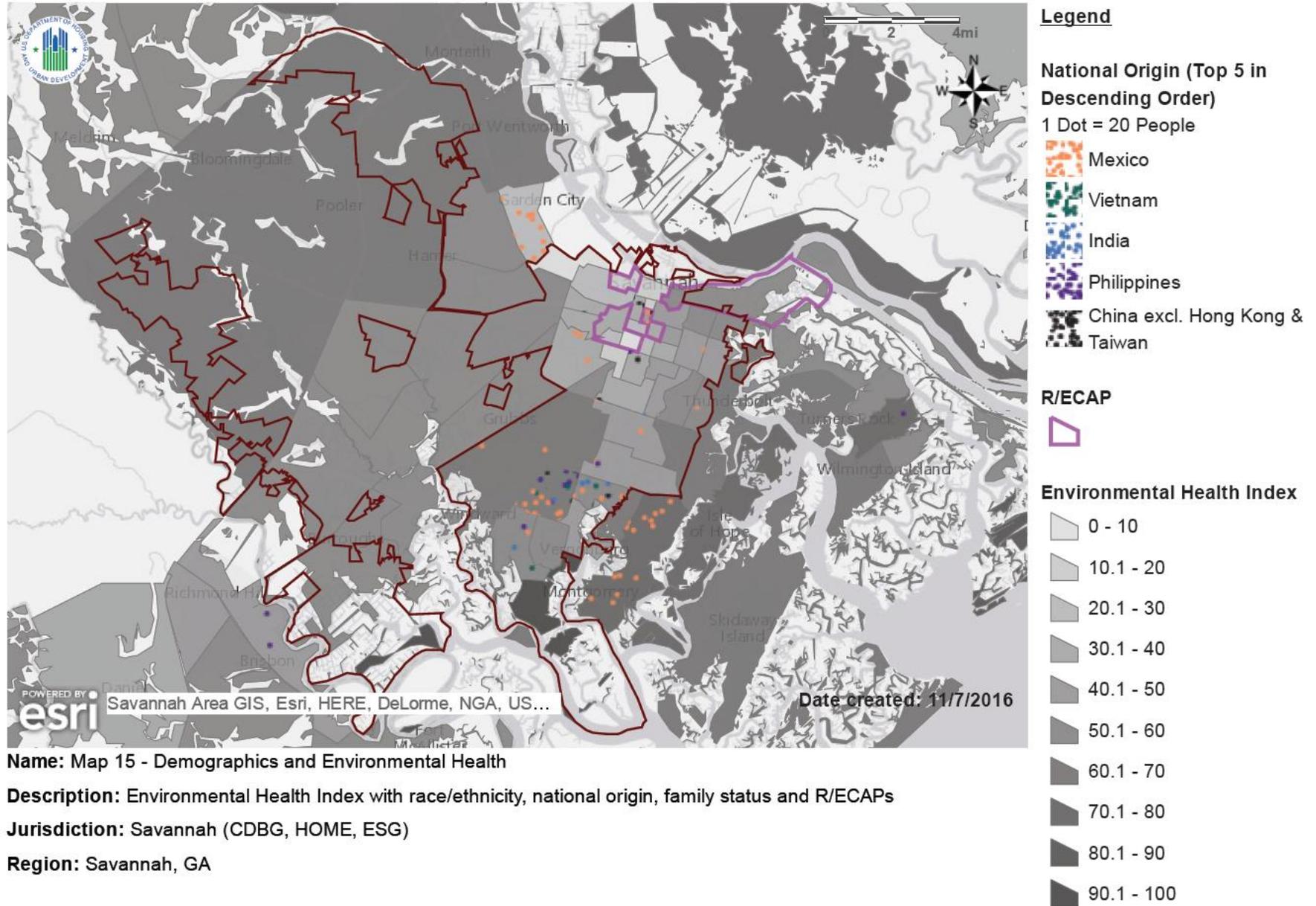
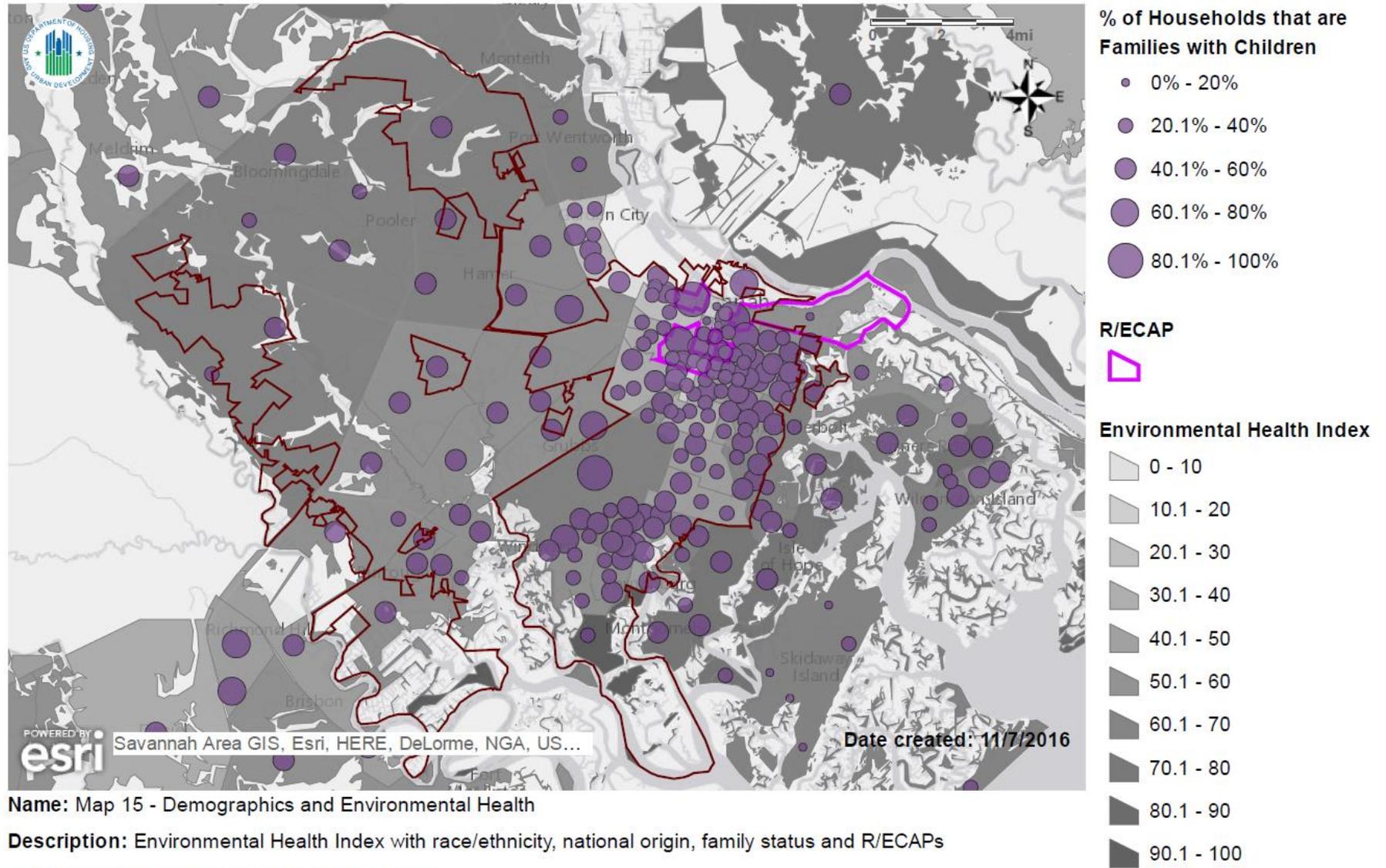


Figure 29. Environmental Health Index and Households with Children in the City of Savannah



Name: Map 15 - Demographics and Environmental Health

Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

f. Patterns in Disparities in Access to Opportunity

- i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.**

Overall, non-Latino Whites tend to live in neighborhoods with lower poverty and higher school proficiency and labor market engagement index values than minority population segments, both in the city of Savannah and in the region. R/ECAP census tracts generally had low scores in each of these dimensions. Opportunity factors related to access to transit and job centers showed less disparity and, in many cases, Whites lived in areas with lower scores and thus less access than other groups. Most R/ECAP tracts had higher scores on these dimensions.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

N/A

- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

The Housing Authority of Savannah's *East Savannah Gateway Transformation Plan* outlines phased redevelopment of Hitch Village and renovation of Fred Wessels apartments into a 600-unit mixed-income community that continues Historic Savannah's street grid. Introducing mixed-income housing in an area that was previously predominately subsidized housing has the potential to reduce exposure to poverty in the area.

Additionally, the City's *West Downtown Urban Redevelopment Plan* was developed with the goal of increasing employment opportunities for public housing residents at Yamacraw Village and other residents in the area by spurring commercial development through an Opportunity Zone designation and local incentives.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Location and type of affordable housing

- Location of proficient schools and school assignment policies
- Impediments to mobility
- Land use and zoning laws
- Private discrimination

iv. Disproportionate Housing Needs

1. Analysis

- a. **Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?**

To assess affordability and other types of housing needs, HUD identifies four housing problems:

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

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

The Coastal Georgia Indicators Coalition also recognizes safe and affordable housing as an essential component of healthy communities and identifies the following as an indicator of a severe housing problem: “the percentage of households with at least one of the following four housing problems: overcrowding, high housing costs, lack of kitchen, or lack of plumbing facilities.”

The Coastal Georgia Indicators Coalition monitors data on a variety of quality-of-life issues in Savannah and succinctly explains why these severe housing problems are important:

“Residents who do not have a kitchen in their home are more likely to depend on unhealthy convenience foods, and a lack of plumbing facilities increases the risk of infectious disease. Research has found that young children who live in crowded housing conditions are at increased risk of food insecurity, which may impede their academic performance. In areas where housing costs are high, low-income residents may be forced into substandard living conditions with an

increased exposure to mold and mildew growth, pest infestation, and lead or other environmental hazards.”¹

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

CHAS data for the city of Savannah and the Savannah region is provided in Table 6. As shown, there are an estimated 23,400 households in the city of Savannah with one or more housing problems and 12,345 with one or more severe housing problems. Nearly one-half of households citywide have a housing need (45.20%), and almost one-quarter have a severe need (23.85%). Comparable rates are somewhat lower in the region, at 37.05% and 18.24%, respectively.

Looking at need by householder race and ethnicity shows that non-Hispanic Whites have the lowest rates of both housing and severe housing problems (36.19% and 17.75%, respectively). HUD defines a group as having a disproportionate need if its members face housing needs at a rate that is ten percentage points or more above that of Whites. Using this definition, three groups have disproportionate housing needs: Native Americans (51.61%), African Americans (52.25%), and Hispanics (54.60%). These three groups also have disproportionate severe housing needs. Native Americans have the highest rate of severe needs at 39.52%, although they make up a very small share of the city (0.24% or 124 households). Hispanics experience severe housing needs at a rate of 37.00%, followed by non-Hispanic other races at 28.76%, and African Americans at 27.94%. Disproportionate housing needs and severe housing needs for Black, Hispanic, and Native American households persist at the regional level.

Table 6 also compares housing need rates for households by size and familial status. Small family households (under 5 people) have the lowest rate of needs (40.13%), followed by non-family households (49.23%). A little over one-half of families with five or more persons have one or more housing needs (56.44%). This pattern holds true for households in the region, although housing need rates are 5-10 percentage points lower than in the city for each household type.

Table 7 examines only one dimension of housing need – severe housing cost burdens. Overall, 11,405 households in the city of Savannah spend more than 50% of their income on

¹ Comments submitted by Tara Jennings, Director, Coastal Georgia Indicators Coalition, Inc., via email, 1/10/2017.

housing (22.03%). Sixteen percent (16.91%) of White households face a severe cost burden. Three population segments have a disproportionate rate of severe cost burdens: Native Americans (40.32%), Hispanics (27.47%), and persons of other races (27.23%).

Looking at severe cost burdens by household type shows that small families (fewer than 5 people) again have the lowest rate of need (17.32%), followed by large families (20.38%), and non-family households (27.74%).

Overall, these data reveal that African American, Native American, and Latino households experience housing, severe housing needs, and severe cost burdens at disproportionately higher rates than Whites. Persons of other races are also disproportionately likely to face severe housing needs and severe cost burdens. In almost all instances, city of Savannah households have higher rates of need, severe need, and severe cost burdens than their counterparts in the region. Native Americans with housing problems are the exception – in the city of Savannah they make up 51.61% of all households with severe needs and severe cost burdens, compared to 57.66% in the region.

Table 6. Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	City of Savannah			Savannah MSA		
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	7,920	21,885	36.19%	24,835	81,169	30.60%
Black, Non-Hispanic	13,830	26,470	52.25%	19,700	40,229	48.97%
Hispanic	974	1,784	54.60%	2,389	5,031	47.49%
Asian or Pacific Islander, Non-Hispanic	415	1,024	40.53%	927	2,606	35.57%
Native American, Non-Hispanic	64	124	51.61%	143	248	57.66%
Other, Non-Hispanic	174	459	37.91%	404	1,368	29.53%
Total	23,400	51,770	45.20%	48,410	130,660	37.05%
Household Type and Size						
Family households, <5 People	10,300	25,665	40.13%	23,565	74,824	31.49%
Family households, 5+ People	1,950	3,455	56.44%	4,625	9,944	46.51%
Non-family households	11,150	22,650	49.23%	20,225	45,894	44.07%
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	3,885	21,885	17.75%	11,555	81,169	14.24%
Black, Non-Hispanic	7,395	26,470	27.94%	10,225	40,229	25.42%
Hispanic	660	1,784	37.00%	1,233	5,031	24.51%
Asian or Pacific Islander, Non-Hispanic	214	1,024	20.90%	532	2,606	20.41%
Native American, Non-Hispanic	49	124	39.52%	64	248	25.81%
Other, Non-Hispanic	132	459	28.76%	203	1,368	14.84%
Total	12,345	51,770	23.85%	23,830	130,660	18.24%

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

Source: CHAS

Table 7. Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	City of Savannah			Savannah MSA		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity						
White, Non-Hispanic	3,700	21,885	16.91%	10,590	81,169	13.05%
Black, Non-Hispanic	6,855	26,470	25.90%	9,415	40,229	23.40%
Hispanic	490	1,784	27.47%	800	5,031	15.90%
Asian or Pacific Islander, Non-Hispanic	185	1,024	18.07%	439	2,606	16.85%
Native American, Non-Hispanic	50	124	40.32%	65	248	26.21%
Other, Non-Hispanic	125	459	27.23%	200	1,368	14.62%
Total	11,405	51,770	22.03%	21,509	130,660	16.46%
Household Type and Size						
Family households, <5 People	4,445	25,665	17.32%	9,485	74,824	12.68%
Family households, 5+ People	704	3,455	20.38%	1,390	9,944	13.98%
Non-family households	6,284	22,650	27.74%	10,649	45,894	23.20%

Note: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS

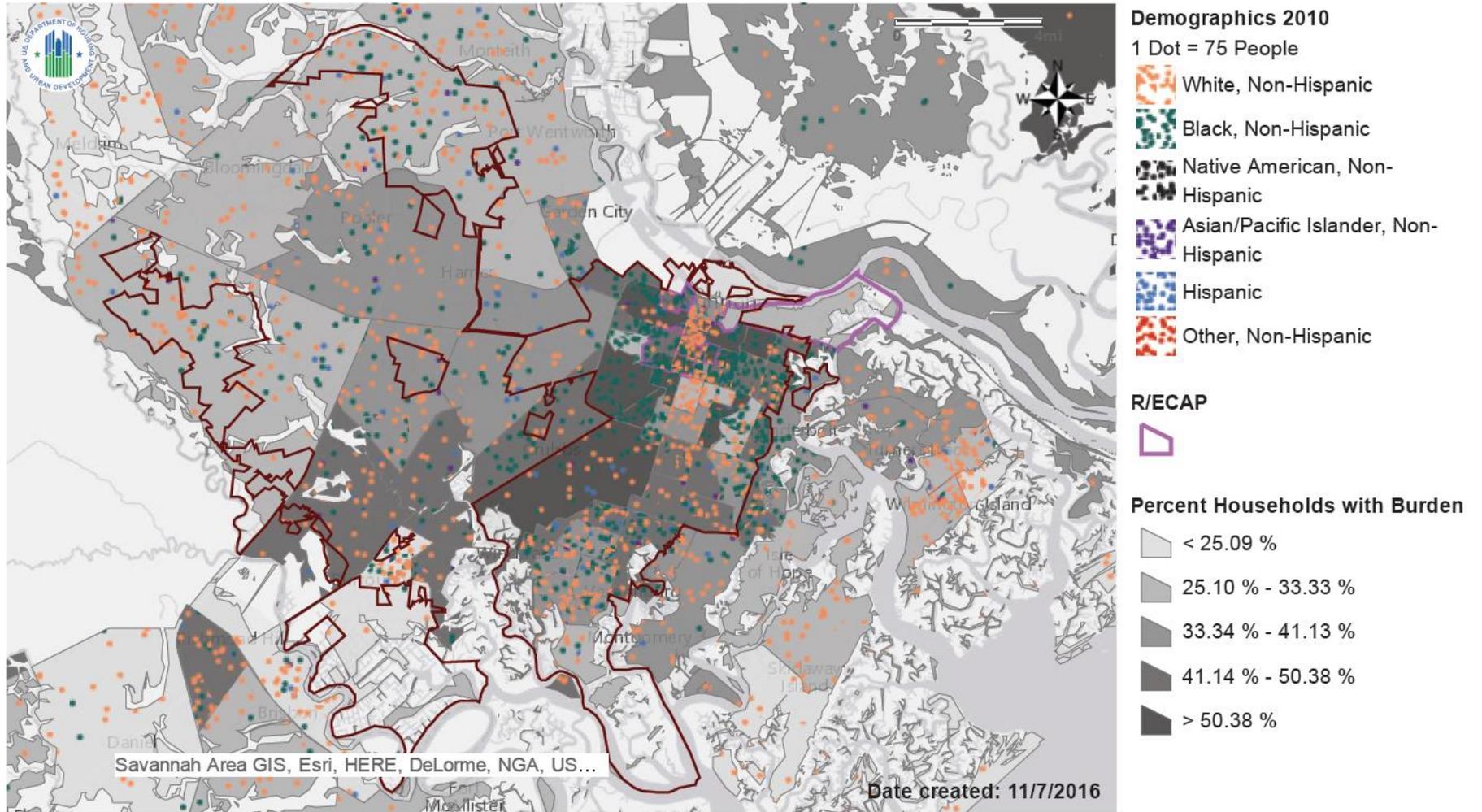
b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

In the city of Savannah, there are no census tracts where more than 50.38% of households have a cost burden. In fifteen tracts, between 41.14% and 50.38% of households are cost burdened (see Figure 30). These include contiguous tracts from the Hunter Army Airfield to downtown Savannah that include portions of the Liberty/Summerside/Southover/Richfield, Cuyler-Brownville, Hillcrest, Blackshear, Eastside, and Midtown neighborhoods. Another set of tracts surrounding the Memorial University Medical Center includes the South Garden, Sackville, and Edgemere neighborhoods. One additional tract west of downtown has a housing need rate within this range and covers the Yamacraw Village, Carver Heights, and West Savannah neighborhoods. Other than these 15 tracts in Savannah, there are no other areas in the three-county region where more than 41.13% of households have a cost burden.

Of Savannah's tracts where cost burdens are most concentrated, four are within an R/ECAP. They include parts of the Cuyler-Brownville, Metropolitan, Dixon Park, East Victorian District, and South Historic District neighborhoods. By definition, these R/ECAP tracts have a minority population of at least 50% and, as the R/ECAP analysis showed, are majority African American. Of the remaining eleven tracts with high rates of housing need, Black residents comprise a majority in eight. The Hunter Army Airfield tract is relatively diverse, as is one tract in the Victorian district; the last tract – in the South Historic District – is predominately White.

As Figure 31 shows, foreign-born persons tend to be concentrated in southeast Savannah, and not in census tracts with a high share of housing problems. Two tracts that do have a high rate of housing needs and a cluster of foreign-born persons include the Liberty City/Summerside/Southover/Richfield area (where over 150 people born in Mexico reside) and the West Savannah, Carver Heights, and Yamacraw Village neighborhoods, where more than 40 residents were born in India.

Figure 30. Housing Burden and Race/Ethnicity in the City of Savannah



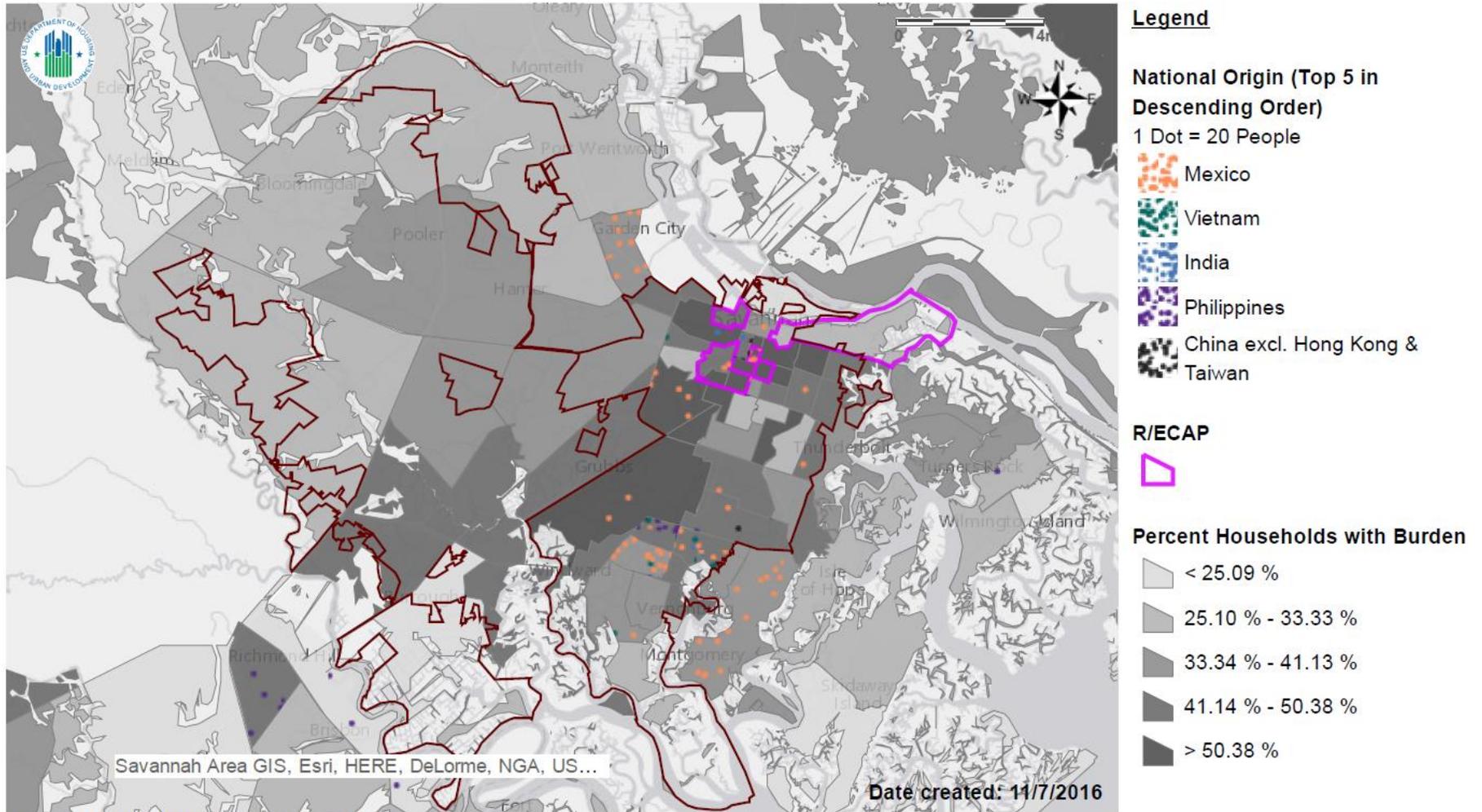
Name: Map 7 - Housing Burden and Race/Ethnicity

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 31. Housing Burdens and National Origin in the City of Savannah



Name: Map 8 - Housing Burden and National Origin

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Table 6 shows that there are 1,950 large family households with a housing problem in the city of Savannah and an additional 1,505 without a problem. While we assume that families with five or more persons include at least one child, smaller family households (up to four persons) may also include children. Table 8 indicates that up to 2,254 households with children reside in publicly subsidized housing in Savannah. This total may include family households with a subsidy who still spend over 30% of their income on housing or have another housing need (such as overcrowding), along with households who do not have a housing problem but would otherwise face a cost burden. Looking at publicly supported housing by number of bedrooms, and assuming that large families would need at least a three-bedroom unit, there is currently an insufficient number of subsidized large units to house the city’s large families who have a housing problem (1,950 people versus 1,588 units). Considering that 3+ bedroom units may also be occupied by large families without a housing problem, the imbalance is likely even higher.

Table 8. Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children								
Housing Type	City of Savannah							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	393	29.42%	420	31.44%	512	38.32%	847	63.40%
Project-Based Section 8	715	70.79%	175	17.33%	113	11.19%	246	24.36%
Other Family	84	73.68%	26	22.81%	2	1.75%	5	4.39%
HCV Program	354	18.19%	596	30.63%	961	49.38%	1,156	59.40%

Source: APSH

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

The American Community Survey’s 2010-2014 five-year estimates provides homeownership and rental rates by race and ethnicity. These figures show that for all households in the city of Savannah, the homeownership rate is 45.01%. Non-Latino Whites have the highest homeownership rate at 51.99%. Rates for minority groups range from 29.26% for Latino households to 41.03% for Asian households. African Americans have a homeownership rate of 40.47%.

While most households in the city are renters, homeownership dominates at the regional level: 60.04% of all households in the Savannah MSA own their homes. As in the city, the homeownership rate is highest for non-Latino Whites (67.97%), followed by Asians (61.12%).

African Americans have a regional homeownership rate of 46.87% and Latinos have the lowest rate at 42.34%.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**

Housing needs for persons with disabilities will be discussed in the Disability and Access Analysis.

- b. **The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.**

N/A

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

- i. **Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?**

Public housing in Savannah is operated by the Housing Authority of Savannah and not by the City. Though the Housing Authority has been consulted in the course of this Assessment of Fair Housing, the Authority will prepare and submit its own AFH, which may include additional detail on publicly supported housing in the city.

Public housing units and HCV program units are overwhelmingly occupied by Black households, according to the data in Table 10. White households, while significantly underrepresented in public housing and HCV units, are far more likely to live in Project-Based Section 8 or other subsidized multifamily units. The total numbers of Hispanic and Asian residents in any type of publicly supported housing were too low to be meaningfully connected to trends in the occupancy of housing units by type.

Table 9. Publicly Supported Housing Units by Program Category		
Housing Units	City of Savannah	
	#	%
Total housing units	63,219	-
Public housing	1,599	2.53%
Project-based Section 8	1,044	1.65%
Other multifamily	218	0.34%
HCV program	2,199	3.48%

Source: Decennial Census; APSH

Table 10. Publicly Supported Housing Residents by Race/Ethnicity								
City of Savannah	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	40	3.03%	1,275	96.52%	5	0.38%	0	0.00%
Project-Based Section 8	299	30.36%	662	67.21%	21	2.13%	3	0.30%
Other Multifamily	44	40.37%	61	55.96%	2	1.83%	1	0.92%
HCV Program	64	3.34%	1,821	95.09%	28	1.46%	0	0.00%
0-30% AMI	3,015	29.26%	6,530	63.37%	435	4.22%	189	1.83%
0-50% AMI	4,710	26.02%	11,800	65.19%	645	3.56%	304	1.68%
0-80% AMI	8,210	29.34%	17,380	62.12%	1,069	3.82%	614	2.19%
Total Population	52,672	37.83%	74,053	53.19%	6,427	4.62%	3,071	2.21%

Note: Numbers presented are numbers of households not individuals.

Source: Decennial Census; APSH: CHAS

Table 11. Publicly Supported Housing Residents by Race/Ethnicity

City of Savannah	Total # units (occupied)	% Elderly	% with a disability	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with Children
Public Housing								
R/ECAP tracts	768	6.28%	5.10%	1.59%	98.15%	0.26%	0.00%	77.62%
Non R/ECAP tracts	588	31.64%	30.77%	4.96%	94.33%	0.53%	0.00%	44.41%
Project-Based Section 8								
R/ECAP tracts	43	4.65%	0.00%	0.00%	100.00%	0.00%	0.00%	97.67%
Non R/ECAP tracts	963	51.60%	25.44%	31.71%	65.75%	2.23%	0.32%	21.10%
Other HUD Multifamily Housing								
R/ECAP tracts								
Non R/ECAP tracts	116	70.18%	32.46%	40.37%	55.96%	1.83%	0.92%	4.39%
HCV Program								
R/ECAP tracts	100	11.70%	12.77%	1.08%	98.92%	0.00%	0.00%	51.06%
Non R/ECAP tracts	1,981	20.31%	11.40%	3.46%	94.89%	1.54%	0.00%	59.86%

Note: Numbers presented are numbers of households not individuals.

Source: Decennial Census; APSH: CHAS

Table 12. Demographics of Publicly Supported Housing Developments by Program Category

Development Name	City of Savannah					
	# Units	White	Black	Hispanic	Asian	Households with Children
Public Housing						
Simon Frazier Homes& Herbert Kayton Homes	400	1%	98%	0%	0%	74%
Sustainable Fellwood Phase III	20	0%	94%	6%	0%	0%
Ashley Midtown	67	3%	97%	0%	0%	57%
Sustainable Fellwood Phase II	40	0%	100%	0%	0%	79%
Edgar C. Blackshear Homes	100	1%	98%	0%	0%	79%
Yamacraw Village	315	2%	97%	1%	0%	87%
Sustainable Fellwood	40	3%	97%	0%	0%	67%
Horace Stillwell Towers	211	12%	88%	0%	0%	0%
Robert Hitch Village & Fred Wessels Homes	250	3%	97%	0%	0%	73%
Ashley Midtown Ii	20	0%	100%	0%	0%	64%
Pickens Patterson Terrace & Single Family Homes	136	4%	93%	2%	0%	75%
Project-Based Section 8 Housing						
Telfair Arms Apartments	45	12%	83%	2%	2%	0%
Rendant Apartments	129	30%	66%	3%	1%	32%
Georgia Infirmary A/Habersham Place	11					
Savannah Summit	138	40%	55%	4%	1%	0%
Oakbrook Towers	96	93%	4%	2%	0%	0%
St John's Villa Apartments	19	5%	95%	0%	0%	0%
Georgia Infirmary B/Hamilton Place	13	36%	64%	0%	0%	0%
Cars III Inc	7					
Snap II Apartments	89	1%	98%	1%	0%	84%
Snap I Apartments	100	1%	99%	0%	0%	62%

Table 12. Demographics of Publicly Supported Housing Developments by Program Category (continued)

Development Name	City of Savannah					
	# Units	White	Black	Hispanic	Asian	Households with Children
Project-Based Section 8 Housing (continued)						
Chatham Association for Residential Services Inc I	16	36%	64%	0%	0%	0%
Cars IV Inc	10					
Cars V Inc	5					
Thomas Francis Williams Court Apartments	151	11%	85%	4%	0%	0%
Ponderosa Forest Apartments Associated Ltd	56	11%	83%	6%	0%	60%
Snap III Apts.	44	0%	98%	0%	0%	98%
IHS Savannah	15	25%	75%	0%	0%	0%
Chatham Association for Residential Services Inc II	6					
The Woods of Savannah	94	79%	16%	2%	2%	0%
Other HUD Multifamily Assisted Housing						
Savannah Gardens Senior Residences	40	20%	80%	0%	0%	0%
Independent Living Horizons 7	8					
McFadden Place	30	77%	23%	0%	0%	0%
Independent Lifestyles	40	38%	51%	5%	3%	14%

Note: Percentages may not add to 100 due to rounding error.

Source: APSH

- ii. **Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.**

Based on 2010-2014 ACS estimates, Savannah's non-Latino White population was 37.1% and the non-Latino Black population was 54.1%. Asians made up 2.2% of the city's population, and people identifying as Hispanic or Latino of any race were 4.9%. Comparing these population shares, Black residents are overrepresented in all types of publicly supported housing. While making up just over half of the city's population, Black residents make up almost 97% of the public housing residents and 95% of Housing Choice Voucher holders. White residents (37.1% of the city's population) made up just 3% of public housing and voucher households. Hispanic and Asian households are also underrepresented in all types of public housing. Households living in Project-Based Section 8 units were distributed most closely to the city's overall racial and ethnic composition.

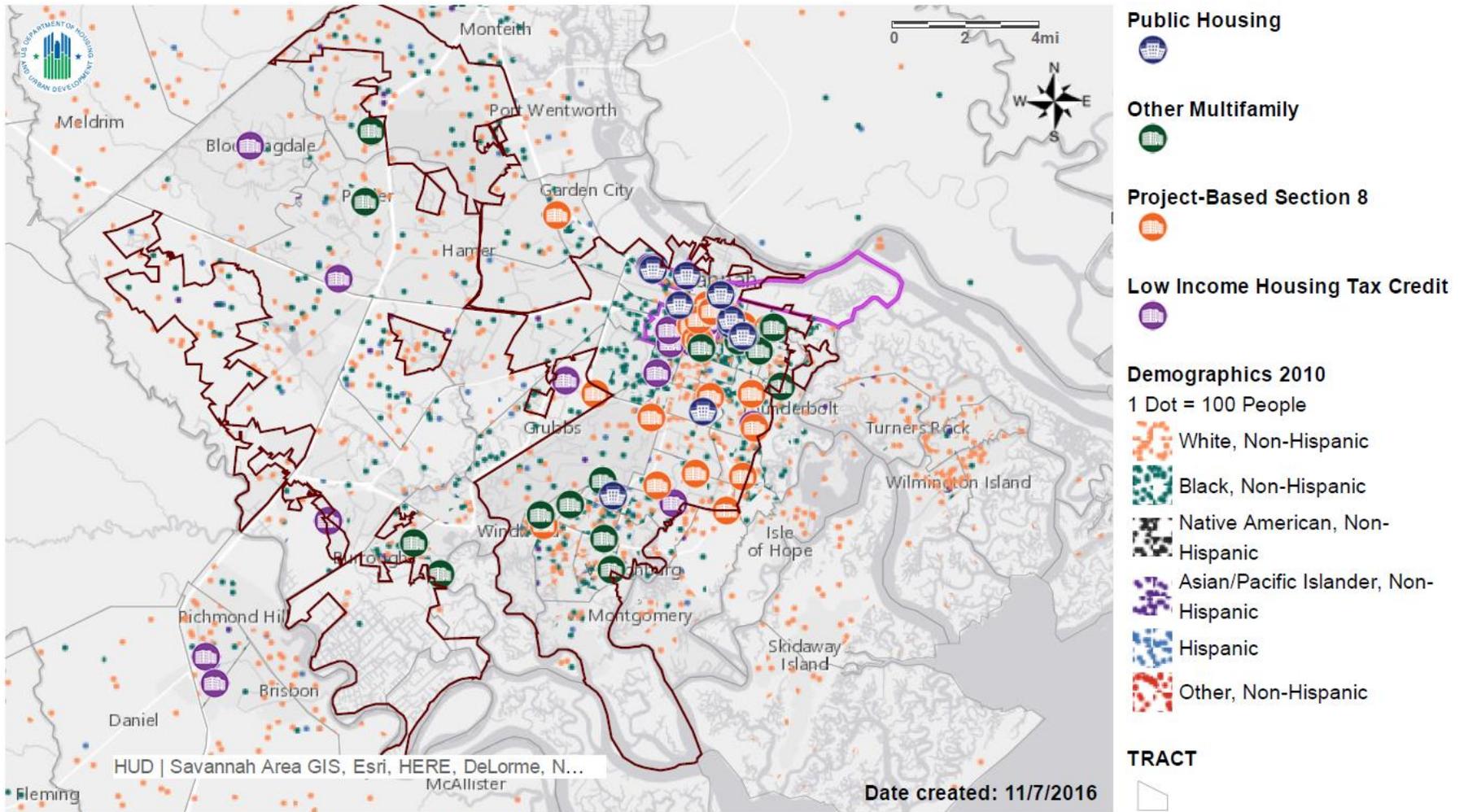
People of color in Savannah are disproportionately affected by poverty, which could partially explain the especially high numbers of Black households living in publicly supported housing. For non-Latino Whites, the poverty rate was 16.7%, approximately half the rate of Blacks (31.4%). However, the share of White households living in public housing or participating in voucher programs is less than 4% that of Black households, a far greater gap than the 53% difference in these groups' poverty status. Further complicating the income explanation is the fact that Asians and Hispanics all experienced high rates of poverty relative to Whites (28.1% and 37.8%, respectively) but are also underrepresented in publicly supported housing units.

b. Publicly Supported Housing Location and Occupancy

Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

Public housing and most other forms of subsidized housing are primarily located in the northern portion of the city, generally north of Victory Drive. This area contains segregated Black communities on the west and east sides of the historic district and also some more integrated transitional neighborhoods such as Metropolitan and Thomas Square. These are also areas designated as R/ECAPs. The segregated White communities of Chatham Crescent and Ardsley Park are relatively devoid of subsidized housing. Further south, in the more racially integrated communities of White Bluff, Paradise Park, and Windsor Forest, there is a somewhat more concentrated presence of subsidized multifamily housing. This area of the city, along with Bacon Park, also has a relatively high concentration of HCV use, but does not contain any R/ECAPs.

Figure 32. Publicly Supported Housing and Race/Ethnicity in the City of Savannah



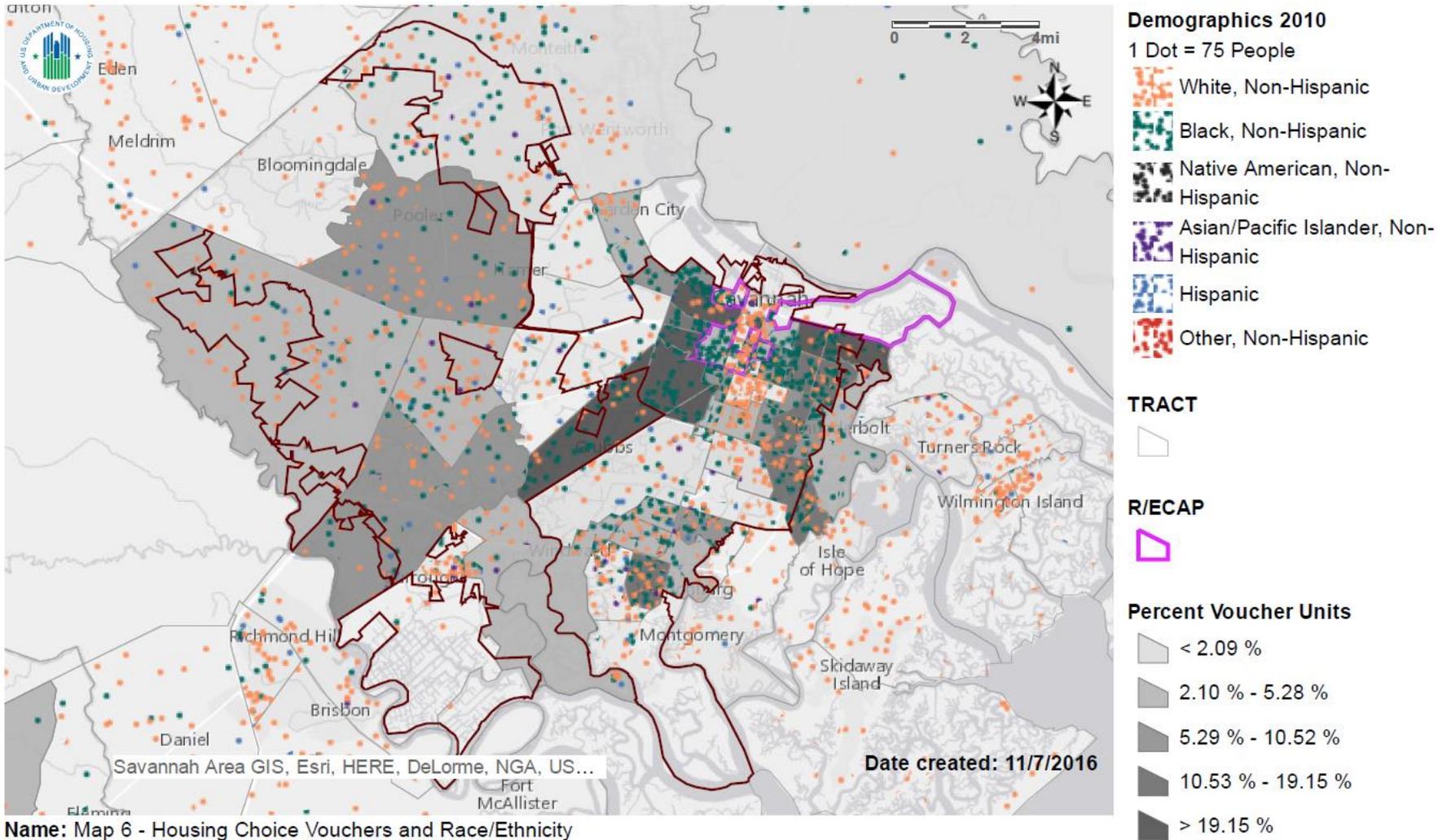
Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 33. Housing Choice Vouchers and Race/Ethnicity in the City of Savannah



Name: Map 6 - Housing Choice Vouchers and Race/Ethnicity

Description: Housing Choice Voucher map with race/ethnicity dot density map and R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

i. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

Nearly 78% of the public housing units occupied by families with children were located in an R/ECAP; by comparison, only 44% of the public housing units outside an R/ECAP were occupied by families with children. This disparity grows even greater for Project Based Section 8 units: 98% of those in R/ECAPs housed families with children while only 21% of those not in one of these areas did. On the other hand, publicly supported units of all types were much less likely to house elderly residents in R/ECAPs than outside them. The same is generally true of units occupied by people with disabilities. This population was more likely to reside in units outside R/ECAPs, except that voucher holders among the disabled population were fairly evenly split.

ii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

Among Black households who live in publicly supported housing, most live in public housing or use Housing Choice Vouchers and there is not a significant difference between the numbers who live inside or outside R/ECAPs. For Project Based Section 8 units, however, 100% of the units in R/ECAPs were occupied by Black households compared to 66% of these units when located outside a R/ECAP. White households are at least two times as likely to reside in subsidized housing outside rather than inside an R/ECAP for public housing and HCV units. But in Project Based Section 8 units, the most common publicly supported housing option for Whites, no White households occupied a unit located in an R/ECAP.

iii. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

Among Savannah's public housing properties, Stillwell Towers, a 20-story senior high-rise, has the largest share of White residents, at 12%. Tenants in other public housing properties are between 93% and 100% Black. Several Project Based Section 8 properties displayed demographic compositions that skewed heavily toward a particular group. Units at Oakbrook Towers were 93% occupied by Whites and just 4% by Blacks; at The Woods of Savannah, White households represented 79% of the units while 16% were occupied by Black households. These examples contrast sharply with the Snap Apartments where the 233 total units were 99% occupied by Black households and St. John's Villa where 95% of tenant households were Black.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

N/A

- iv. **Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.**

The demographics of the residents of subsidized housing developments are generally consistent with those of the immediate surrounding community, with a few exceptions. Yamacraw Village and Hitch Village/Fred Wessels Homes are both 97% Black, yet each one directly abuts the city's North Historic District, a predominantly White neighborhood. In other areas (e.g. Sustainable Fellwood, Savannah Gardens) where public housing units have been replaced with mixed income developments, the racial makeup has remained essentially unchanged.

c. Disparities in Access to Opportunity

- i. **Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

Residents of publicly supported housing tend to face disparities in access to opportunity. Areas where public housing units are primarily sited (north of Victory Drive, but outside the Historic District) tended to have relatively low levels of labor market participation, especially to the west of downtown. These parts of the city also had lower school proficiency scores. Proximity to jobs in these areas is generally good, as is public transportation access. On Savannah's south side in the neighborhoods of Windsor Forest and White Bluff, where there is a relatively high concentration of Housing Choice Vouchers in use, many of the same low opportunity characteristics are present: low school proficiency and low rates of labor market engagement.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**

N/A

- b. **The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant**

programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

N/A

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Impediments to mobility
- Occupancy codes and restrictions
- Source of income discrimination

D. Disability and Access Analysis

1. Population Profile

- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

In the city of Savannah, an estimated 18,019 persons over the age of 5 have a disability (Table 13), representing 13.2% of the total population. Seniors (persons age 65 and older) have by far the highest disability rate at 43.7%. In contrast, about one-in-ten people age 18 to 64 have a disability.

Within the region, 11.6% of the population over age 5 has a disability. For all age groups, disability rates are slightly lower in the MSA compared to the city. This may reflect that many people with disabilities live in Savannah because it has better access to transit and other services than the suburbs.

Age of People with Disabilities	City of Savannah		Savannah MSA	
	#	%	#	%
Age 5-17 with disabilities	1,149	5.5%	2,983	4.9%
Age 18-64 with disabilities	9,615	10.8%	21,416	9.6%
Age 65+ with disabilities	7,210	43.7%	16,307	38.1%

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

Source: ACS

Ambulatory disabilities are the most common type in Savannah, affecting 8.67% of the population, followed by independent living difficulties, which impact 5.94%. Figures 34 and 35 show the geographic distribution of persons with disabilities throughout Savannah. These maps reveal that, while persons with disabilities live throughout the city, they are more likely to live in central Savannah neighborhoods north of Victory Drive but south of the historic district. R/ECAPs residents experience slightly higher rates of disability than the city (14.69% versus 13.20%).

Table 14. Disability by Type				
Disability Type	City of Savannah		Savannah MSA	
	#	%	#	%
Hearing difficulty	3,871	3.08%	9,914	3.08%
Vision difficulty	2,673	2.13%	6,281	1.95%
Cognitive difficulty	6,198	4.94%	13,640	4.24%
Ambulatory difficulty	10,876	8.67%	22,570	7.02%
Self-care difficulty	4,172	3.32%	8,281	2.58%
Independent living difficulty	7,458	5.94%	14,689	4.57%

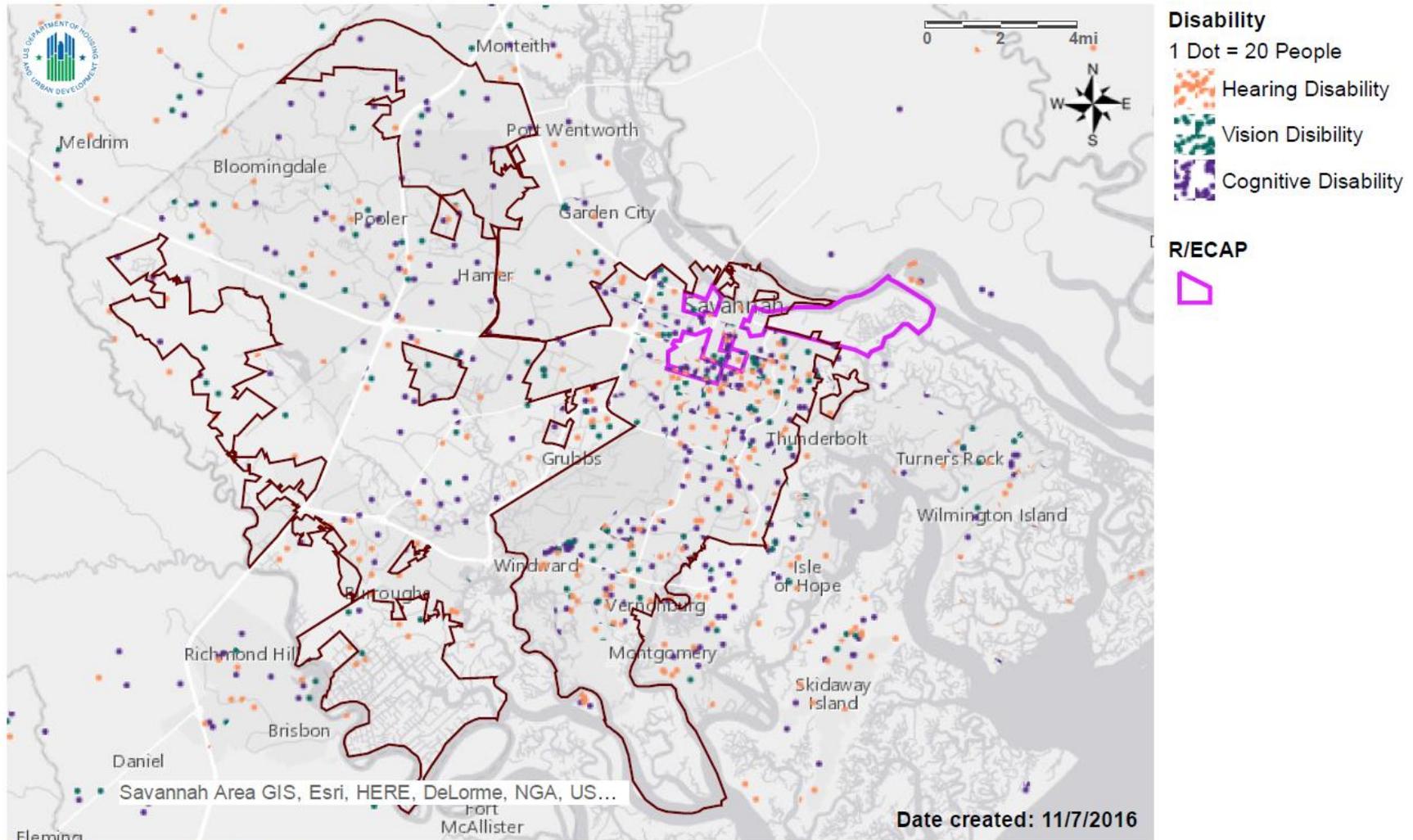
Note: All % represent a share of the total population within the jurisdiction or region.

Source: Decennial Census; ACS

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

Figures 34 to 36 shows the geographic distribution of persons with disabilities by age and type. Overall, residential patterns do not vary significantly by age or type of disability. The area containing the Hunter Army Airfield does not include many persons with disabilities, regardless of age, while the neighborhoods to its east (Oakdale, Avalon, Highland Park) have a high proportion of elderly persons with disabilities.

Figure 34. Persons with a Hearing, Vision, or Cognitive Disability in the City of Savannah



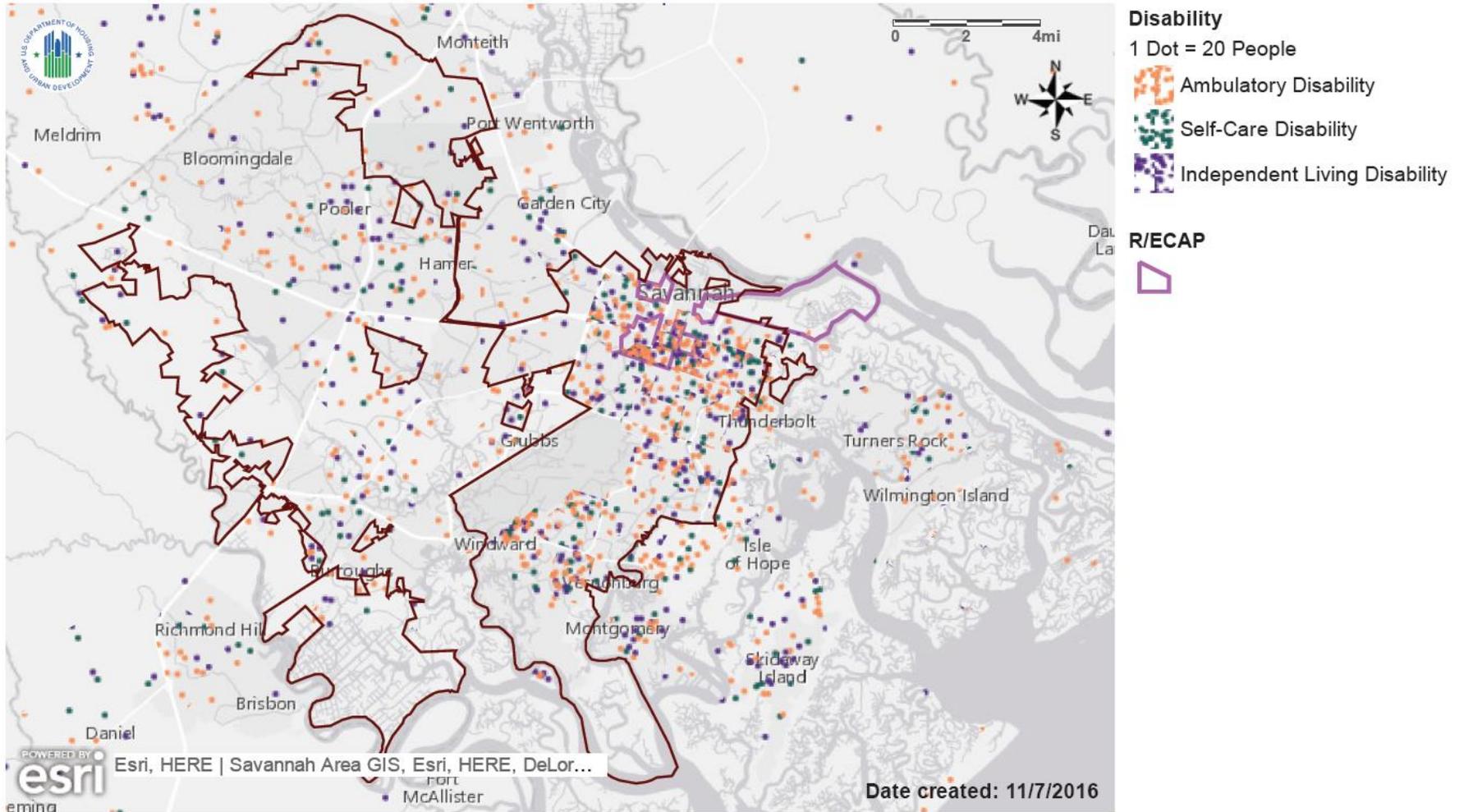
Name: Map 16 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 35. Persons with an Ambulatory, Self-Care, or Independent Living Disability in the City of Savannah



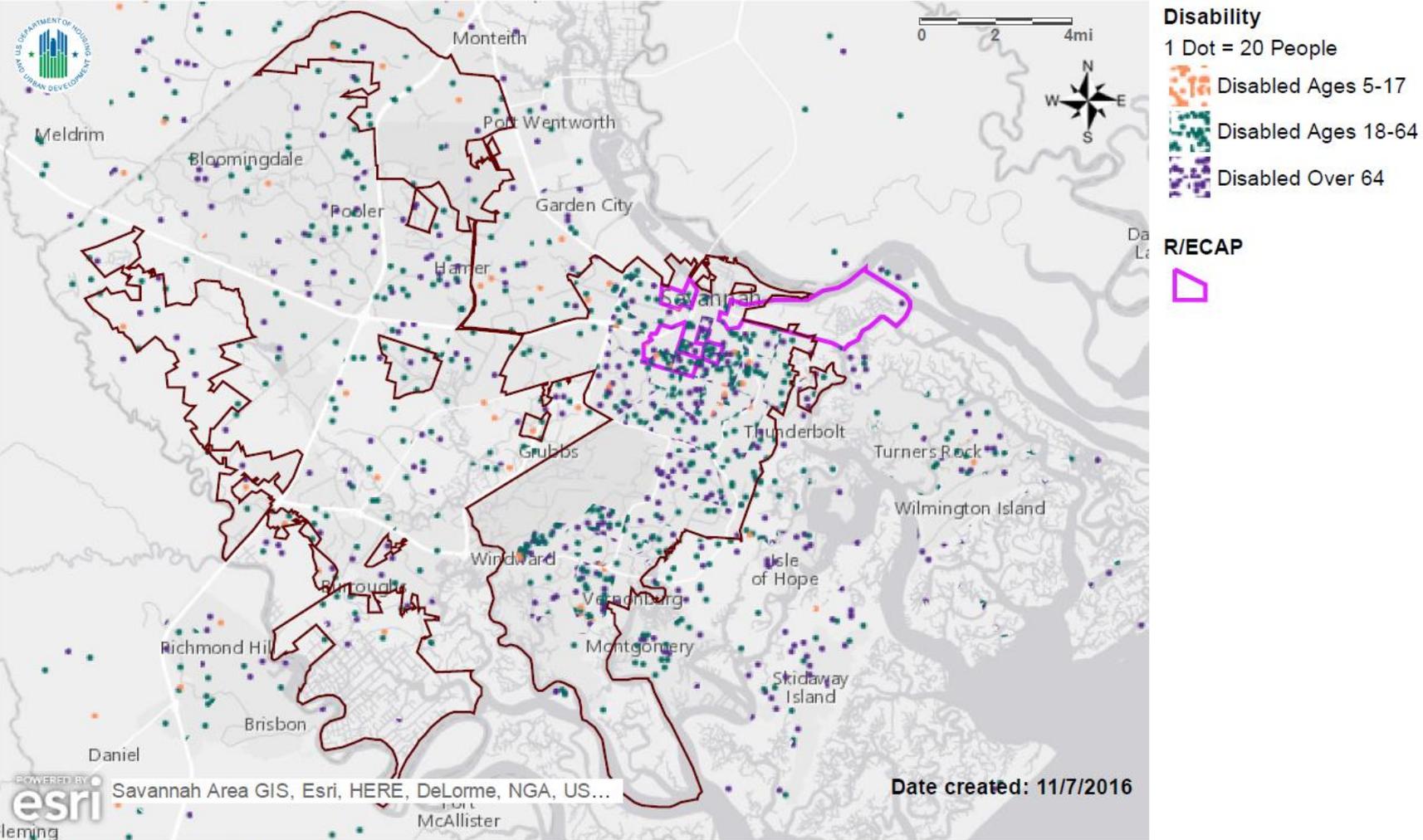
Name: Map 16 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

Figure 36. Persons with a Disability by Age in the City of Savannah



Name: Map 17 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Savannah (CDBG, HOME, ESG)

Region: Savannah, GA

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Stakeholder input indicates that the neither the city of Savannah nor the region has a sufficient supply of affordable, accessible housing in a range of unit sizes. Several barriers to housing accessibility were identified, including:

- There is an inadequate supply of subsidized affordable housing that is accessible. Section 8 voucher holders may not be able to find a rental unit that is accessible where they can use their voucher and may not be able to make needed modifications.
- There is also an inadequate supply of unsubsidized housing that is both affordable and accessible. It is difficult to find anything for under \$1,000 a month. There are very limited mid-range options; market tends to be either low quality or high priced.
- If you are buying a new single-family home, builders may make accommodations. However, many existing single-family homes in the community are older and/or historic and it is difficult to retrofit them in all the ways that would be necessary to truly accommodate someone with a disability.
- Many affordable, accessible units are designed for one or two adults (i.e., one bedroom units) and do not accommodate families with children with a disabled household member.
- While some units are accessible to someone with an ambulatory difficulty, persons with a hearing or vision difficulty require a different design.
- There is an inadequate supply of housing with supportive services for mentally disabled residents, including people transitioning out of homelessness, and an inadequate supply of housing for disabled veterans.
- Private multifamily housing developers have failed to meet accessibility and adaptive design requirements when constructing new townhomes in Savannah and Pooler (discussed in more detail in Fair Housing Enforcement, Outreach Capacity, and Resources Analysis).
- Apartment communities that have accessible units may not have accessible features and amenities so disabled persons are unable to make full use of the property.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

HUD's Multifamily Inventory of Units for the Elderly and Persons with Disabilities identifies a total of 276 subsidized units with accessible features in 25 properties in Savannah as of 2010. The majority of these are in census tracts 36.02 and 109.01, where Jasmine Place, Independent Lifestyles, and Rendant Apartments provide a combined 155 units with accessible features (or 56.16% of all accessible subsidized units listed in Savannah). The remaining 45% of accessible units are spread throughout 16 tracts in the city. One property – SNAP Apartments, Phase III – is located in an R/ECAP (tract 15 in the Midtown area).

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

As Table 15 shows, persons with disabilities are able to access various types of publicly supported housing. Multifamily housing other than public housing or project-based Section 8 has the highest share of households with a disabled member. About one-third of these units are home to someone with a disability. Project-based Section 8 units follow, where about one-quarter of households include someone with a disability. The housing choice voucher program houses the lowest share of persons with disabilities; only 11.46% of households with a voucher have a member with a disability. This data supports stakeholder input that it can be difficult to find accessible units on the private market, especially with the additional restriction that they would have to accept a Section 8 voucher.

Table 15. Disability by Publicly Supported Housing Program Category				
Housing Type	People with a Disability			
	City of Savannah		Savannah MSA	
	#	%	#	%
Public Housing	215	16.09%	233	15.86%
Project-Based Section 8	246	24.36%	251	20.32%
Other Multifamily Housing	37	32.46%	37	32.46%
HCV Program	223	11.46%	276	10.62%

Note: The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

The American Community Survey does not provide data regarding the number of persons with disabilities who reside in institutional settings, and no count is available locally. The Georgia Regional Hospital at Savannah (GRHS) is a state-funded facility that provides care for persons with developmental disabilities and adults with mental disabilities. GRHS has 33 beds for short term care, 34 beds for clients in the criminal justice system, and 34 beds in a recovery care unit that focuses on rehabilitation to improve coping and living skills for a transition outside of the hospital. GRHS is located in the Bacon Park/Sandfly area, which is one of Savannah’s more racially diverse areas according to the 2010 Census.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

The Housing Authority of Savannah reports that five percent of the affordable housing it provides is accessible to persons with disabilities. The City of Savannah requires that tax credit developers meet FHA accessibility requirements, but also encourages that all units be designed to be visitable. Habitat for Humanity, which constructs single-family affordable homes in the city, designs its homes to be visitable and can build them to be fully-accessible if desired by the property owner.

In terms of supportive services, Living Independence for Everyone (LIFE)'s Independent Living Center provides assistance as clients transition from nursing homes to housing within the community at a place of their choosing. Other services available at the Center include information and referrals, independent living skills training, peer support, and advocacy. Additionally, LIFE operates a youth program in local schools that leads students in programs about living on their own, searching for and leasing an apartment, and other consumer information.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning government services and facilities, public infrastructure, transportation, proficient schools and educational programs, and jobs.

Access to government facilities, public infrastructure, and transit can be a considerable barrier for persons with disabilities, and can impact their ability to access educational and employment opportunities. The City of Savannah operates multiple neighborhood-based facilities designed to help residents, including those with a disability, advance their education and employment. The Moses Jackson Advancement Center in the West Savannah neighborhood provides training for middle and high school students and adults in the areas of job training, academic assistance, business development, career development, and homebuyer and financial education. The Savannah-Chatham County Public School System also offers assistance to students with disabilities in obtaining post-secondary education or employment through their "Preparing Students with Disabilities for College/Technical School or Employment" program. This presentation is provided by the school district's Department of Specialized Instruction, in partnership with the HIS School Guidance Department, the GA Vocational Rehabilitation Services Program, and Armstrong State University Disability Services.

The Savannah Entrepreneurial Center focuses on business development by helping Savannah residents through the process of starting a business. Services include business mentoring, technical assistance, networking and classroom opportunities, referrals for financial resources, and business incubator space.

To improve accessibility of public infrastructure, the City dedicates Special Purpose Local Option Sales Tax (SPLOST) funds to neighborhood sidewalk improvements. From 2014 to 2020, the City anticipates spending \$9 million in SPLOST monies for ADA and other improvements. In

addition to sidewalk infrastructure improvements, Savannah also has several parks and recreation fields accessible to people with disabilities. According to the City's Facility Atlas, 56 of its 82 recreation facilities are accessible to people with disabilities. Several playgrounds have adaptive play equipment specifically designed for children with disabilities, and the Garden of Fragrance in Forsyth Park encourages visitors, including persons with disabilities, to experience the park using a variety of senses.

As mentioned in the discussion of transportation opportunity, Chatham Area Transit (CAT) includes accessibility features on its fixed-route service such as kneeling buses, ramps that bridge to the curb, priority and wheelchair seating, permission to bring service animals aboard, and automated announcement systems. CAT also operates a paratransit service that provides door-to-door service for persons with disabilities who are unable to use fixed-route service. Customers must apply for this service and can be eligible for temporary, conditional, or unconditional use.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Savannah has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. The City's zoning code provides a process for requesting a variance, however, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land.

Under a variance request, the Zoning Board of Appeals has the power to hear and decide applications for variances following the public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome.

The City is currently drafting a new zoning ordinance, but the current version (Draft 3) also lacks a clear reasonable accommodation process. Building construction in the city must comply with the 2012 International Building Code and the 2010 Federal ADA Standards for Accessible Design.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

The American Community Survey does not provide tenure or homeownership rates for persons with a disability or by disability type, nor is this data available locally. Stakeholder input suggests some factors that could be barriers to homeownership, including:

- Households with a disabled family member, including those with mental or behavioral difficulties, often have limited financial resources after covering basic needs and healthcare costs, inhibiting the ability to save for a down payment and possibly affecting credit scores.
- The amount of renovation that may be needed to make older homes fully accessible (such as possibly having to widen doorways or hallways) can limit the stock from which to select a home and/or increase its cost.
- Depending on disability type, the individual may rely on supportive services not available in a single-family home setting.
- The homeownership process may not be accessible to persons with cognitive disabilities who may have limited financial literacy.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

HUD's Comprehensive Housing Affordability Strategy (CHAS) data provided for this analysis does not identify levels of housing need for persons with disabilities or by disability type. Input received from stakeholders who work with clients with mental and physical disabilities indicate that cost burdens are an issue for this group, and that the supply of affordable accessible units is very limited. Disabled persons who are unable to work and receive Supplemental Social Security (SSI) payments receive \$733 a month in Georgia, which translates to an affordable rent of \$220 or less. With such limited incomes, this group is very likely to face a cost burden or severe cost burden. Disabled seniors are also more likely to face a cost burden if their incomes decline as they reach retirement, especially if they rent their homes.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

N/A

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

See the discussion of disability-related fair housing lawsuits and complaints provided in the Fair Housing Enforcement, Outreach Capacity, and Resources Analysis.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

- 1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.**

For the period 2011 through 2016, three cases of alleged housing discrimination in Savannah resulted in federal litigation, and one national case involving housing units in Savannah led to a significant conciliation agreement with the FHEO. These four cases involved discrimination on the basis of race, sex, or disability.

- ***Savannah-Chatham County Fair Housing Council, Inc. v. Morgan, Civil Action No. 4:07-cv-00125 (S.D. Ga.) and United States v. Morgan, Civil Action No. 4:08-cv-00176 (S.D. Ga.)***

The Savannah-Chatham County Fair Housing Council, Inc. (SCFHC) and individual private plaintiffs filed this action against the owner and operators of a mobile home park in Bloomingdale, Georgia (a neighboring municipality, also in Chatham County). Plaintiffs alleged that Morgan Mobile Home Parks discriminated on the basis of race, color, and sex when, Defendants denied the availability of dwelling units/lots to African-American persons and refused to negotiate with African-American prospective tenants while at the same time making dwelling units/lots available to potential White tenants. Defendants also were alleged to have subjected female tenants to severe, pervasive, and unwanted sexual harassment. The Department of Justice conducted an independent investigation and found additional evidence of a pattern or practice of discrimination and additional victims.

The Defendants denied liability, but on June 23, 2010, entered a Consent Decree settling the private plaintiffs' and the DOJ's claims. Under the Consent Decree, Morgan Mobile Home Parks was required to pay a settlement totaling \$680,000, which included \$280,000 to the private plaintiffs; \$350,000 to the U.S. for additional aggrieved parties; and a \$50,000 civil penalty. The consent decree also prohibits the defendants from engaging in discrimination and requires that an independent manager manage the properties. The consent decree remained in effect for four years, and during that period, no filings were made to dispute or enforce its terms.

- ***Savannah-Chatham County Fair Housing Council, Inc. v. Genesis Designer Homes, LLC, Civil Action No. 4:06-cv-00096 (S.D. Ga.) and United States v. Genesis Designer Homes, LLC, Civil Action No. 4:07-00139 (S.D. Ga.)***

On April 12, 2006, SCFHC filed a federal fair housing lawsuit against the developers, owners, and managers of Stonelakes Townhomes in Savannah and Highlands Crossings Townhomes in Pooler for allegedly engaging in a pattern or practice of discrimination against persons

with disabilities by failing to design and construct the subject properties with the features of accessible and adaptable design required by FHA 42 U.S.C. § 3604(f)(3)(C). Together the two developments contain 193 ground floor (or “covered multifamily units”) subject to the FHA’s accessibility and adaptive design standards. After an independent investigation, the DOJ filed a substantially similar lawsuit involving the same operative facts and defendants. The federal district court consolidated the two cases and subsequently ruled that certain features of the subject properties do not meet the accessibility requirements of the FHA and the HUD Fair Housing Accessibility Guidelines (24 C.F.R. Part 100).

In June 2011, the court entered partial consent orders resolving the United States’ claims against three defendants (Genesis Designer Homes, Inc., Malphrus Construction Co. and Genesis Real Estates Group, LLC), who were no longer in business. These consent orders, in effect for five years, provide that if any defendant resumes the business of designing and constructing multi-family housing, it must notify the DOJ and ensure that all its work on multi-family dwelling units complies with the features of accessible and adaptable design, as well as comply with certain employee training and reporting requirements.

On October 26, 2011, the court entered a partial consent order resolving the remaining claims against the site engineer defendant (Thomas & Hutton), requiring that the defendant fund and provide services to retrofit the public and common use areas of the subject properties, including (1) pay \$2,000 to LIFE, Inc., a non-profit advocacy organization for persons with disabilities, to administer the oversight of the retrofits; (2) pay \$227,500 into a retrofit fund; and (3) pay \$50,000 in damages to named aggrieved persons; and (4) pay \$158,375 in damages to SCFHC. In addition, Thomas & Hutton agreed to standard injunctive relief including non-discrimination in future construction, training, and reporting requirements. The consent order was effective for three years.

- ***Teniyaka Sams v. GA West Gate, LLC, Civil Action No. 4:15-cv-00282 (S.D. Ga.)***

On October 21, 2015, the Savannah-Chatham County Fair Housing Council and 16 individual plaintiffs sued the owners, operators, and managers of the Westgate Apartments and the City of Garden City (a neighboring municipality, also in Chatham County) for discrimination on the basis of race in connection with the ownership and operation of rental units. At the time, Westgate was occupied entirely by African-American households.

The complaint alleged that among other offenses, defendants evicted tenants because of race or color; used different qualification standards or procedures because of race or color; limited services or facilities because of race or color; showed a preference because of race or color; and rejected applicants for rentals because of race or color. The complaint further alleged that Garden City refused to provide municipal services because of race or color or provided services in a manner that had a disparate impact or effect of perpetuating segregated housing patterns. Plaintiffs argued that Garden City urged Westgate to evict any tenant with a criminal history, regardless of nature, age or disposition of the charge or the tenant’s conduct while residing at the apartments. According to the complaint, tenants of Westgate were targeted for the mass eviction because of their race or color while tenants of other apartment developments in Garden City who also have criminal records were not subject to the same treatment or standards.

Garden City and the private Defendants have denied the allegations. As of the writing of this report, the suit is still pending in the pretrial discovery phase.

- ***National Fair Housing Alliance, et al v. Bell Partners, Inc., et al, FHEO Case Numbers 04-14-0313-8, 04-14-0321-8, 06-14-0351-8, and 06-14-0350-8 (Conciliation Agreement)***

On January 14 and 23, 2014, three fair housing organizations (the National Fair Housing Alliance, the Austin Tenants' Council, and the National Association of the Deaf), filed complaints against a national real estate company that owns and operates more than 64,000 homes in 15 states. The complaint alleged that the respondent developer's communities, including the Waters Apartments located at 8000 Waters Avenue in Savannah, denied housing to deaf people, violating the FHA through discriminatory refusal to rent and discriminatory terms and provision of services because of disability.

Testers in Savannah posed as rental applicants who were deaf or hard of hearing and inquired about rental units using the Internet Protocol Relay system, which allows deaf or hard of hearing individuals to communicate with hearing persons via phone using computer text. Testers who used the relay system were often hung up on or sent directly to voicemail, unlike testers not using the relay system or posing as deaf, and were quoted higher rental prices and not offered the same specials and amenities offered to others.

On May 5, 2014, the FHEO Regional Director on behalf of HUD approved a conciliation agreement between the parties requiring the respondent to pay \$175,000 to the NFHA, to provide greater training to employees, and to include the use of assistive technology for the deaf or hard of hearing such as telecommunications relay services. In addition, Bell Partners agreed to pay \$15,000 to the National Association of the Deaf for consulting services in the development of policies addressing equal access to housing opportunities for applicants with disabilities and the correct handling of telecommunications relay calls and other types of communications with deaf and hard-of-hearing individuals.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

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

Savannah has not adopted a local fair housing ordinance.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Savannah's primary source for fair housing information, outreach, and enforcement is the Savannah-Chatham County Fair Housing Council, one of only two such organizations in the state. Although not specifically focused on the Savannah area, the Georgia Commission on Equal Opportunity and the U.S. Department of HUD also provide some limited support for local fair housing initiatives.

The Savannah-Chatham County Fair Housing Council (SCFHC) provides residents of Savannah, Chatham County, and surrounding counties with fair housing services. The SCFHC accepts and processes complaints from residents who believe they may have been subjected to illegal discrimination in the housing market. The organization investigates fair housing complaints and monitors compliance of housing providers; works to negotiate settlements between complainants and housing providers; provides education to residents and housing providers of their fair housing rights and responsibilities; and works with other federal, state, and local agencies to implement fair housing laws and policies. When appropriate, the SCFHC also may sue a housing provider in federal or state court on behalf of an aggrieved person to seek redress for a violation of fair housing rights or an injunction to enforce fair housing laws and regulations. The SCFHC has received approximately \$34,000 per year as a subrecipient under the City's CDBG program and has also received periodic allocations from the City's general funds, but received no funding from Chatham County or any other jurisdictions it serves. The organization was a HUD Fair Housing Initiatives Program (FHIP) award grantee for FY 2012 and 2015.

The Georgia Commission on Equal Opportunity (GCEO) is under the auspices of the Office of the Governor. The GCEO has a Board of Directors made up of attorneys and community leaders statewide. The GCEO has two divisions: the Equal Employment Division and the Fair Housing Division. The mission of the Fair Housing Division is to promote broader housing choices in Georgia; to promote understanding of the Georgia Fair Housing Act and the federal FHA; to encourage integrated communities/neighborhoods; to secure compliance with state and federal fair housing laws; to eliminate discrimination; and to punish persons who violate fair housing laws. Under Georgia's Fair Housing Act, the GCEO has the authority and responsibility to administer and enforce fair housing rights. Georgia's housing discrimination law has been judged to be "substantially equivalent" to the federal FHA, which allows for HUD-subsidized, state-level enforcement of fair housing laws through the Fair Housing Assistance Program (FHAP). The GCEO ceased to participate in the FHAP in 2012, though it has reported that as of 2015 it was working to re-certify as a FHAP agency.

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

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

An individual who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint. Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints filed with HUD

The Atlanta Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. A request was made for complaints received regarding housing units in Savannah for the period January 1, 2011 through November 7, 2016.

From January 2011 to November 2016, HUD received 24 formal complaints of housing discrimination in Savannah. (One of these complaints, filed in April 2012, came to HUD through Georgia’s then FHAP agency, the GEOC.) As of November 29, 2016, all of the 24 reported cases involving perceived or alleged discrimination in housing had been closed. Over half of the cases, 14 of 24, were closed administratively due to a no cause determination by HUD following its investigation into the allegations and a lack of sufficient evidence to conclude that discrimination had occurred. One case was withdrawn by the complainant without resolution; one was withdrawn after resolution. Two cases were closed because the complainant failed to cooperate. And five cases were successfully conciliated by HUD with a settlement in favor of the complainant, totaling \$66,000.

Table 16. Fair Housing Complaints by Basis – Filing Date 2011-2016							
Basis	2011	2012	2013	2014	2015	2016	Total
Race	3	2	1	2	1	1	10
Color	1						1
National Origin							0
Religion	1			1	1		3
Sex	2		1			1	4
Disability			1	4	4		9
Familial Status	1				2		3
Retaliation			1				1

Total Bases	8	2	4	7	8	2	31
Total Complaints	5	2	4	7	5	1	24

More than one basis of discrimination may be cited in a single complaint. Thus, the 24 complaints filed and cases opened represent a total of 31 bases of discrimination. Race was the most often cited basis of discrimination with 10 counts, nearly one-third of the total bases, followed by disability with 9 counts and sex with 4 counts. Of the 5 cases which HUD help to mediate a conciliation or settlement agreement, three of those cases were on the basis of disability, one was based on retaliation, and one was based on race.

Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory *issue*.

Table 17. Fair Housing Complaints by Issue – Filing Date 2011-2016	
Issue	Total
Discriminatory advertising, statements and notices	6
Discriminatory terms, conditions, privileges, or services and facilities	12
Discriminatory acts under Section 818 (e.g., coercion)	3
Discrimination in terms/conditions/privileges relating to rental	8
Discriminatory refusal to sell	1
False denial or representation of availability - sale	1
Discriminatory refusal to rent	5
Discriminatory refusal to rent and negotiate for rental	3
Discrimination in services and facilities relating to rental	1
False denial or representation of availability	1
Otherwise deny or make housing unavailable	5
Discrimination in the appraising of residential real property	1
Failure to make reasonable accommodation	4
Discriminatory financing (includes real estate transactions)	1
Discrimination in terms/conditions/privileges relating to sale	1
False denial or representation of availability - rental	1
	54

The 24 complaints filed cited 54 discriminatory actions or practices. “Discriminatory terms, conditions, privileges, or services and facilities,” drawn from Sec. 804 of the FHA, was the most often violation alleged. In the cases which HUD settled, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

Complaints filed with the Georgia Equal Opportunity Commission

The Georgia Equal Opportunity Commission, which maintains complaint data by counties, reported that it had received one complaint of housing discrimination in Chatham County for the period January 1, 2011, through November 15, 2016. The alleged discriminatory act was based on race, but the case was closed due to a failure of the complainant to cooperate in the process.

Table 18. Georgia Equal Opportunity Commission Complaint Data Jan. 1, 2011 - Nov. 15, 2016				
Case No./ Date	Basis	Issue 1	Issue 2	Status/Disposition
20110015	Race	Refusal to rent (O.C.G.A. § 8-3-202(a)(1))	Different terms, conditions, or privileges of the sale or rental of a dwelling or in the provision of services or facilities (O.C.G.A. § 8-3-202(a)(2))	Administrative Closure (Failure to Cooperate)

Complaints filed with the Savannah-Chatham County Fair Housing Council

The Savannah-Chatham County Fair Housing Council reported the following data regarding fair housing complaints it received for the period 2011 through 2016.

Table 19. Savannah-Chatham County Fair Housing Council Complaint Data by Basis/Bases							
Basis	2011	2012	2013	2014	2015	2016	Total
Race	1		15	3		2	21
Sex/Gender	1						1
Color			15	3		1	19
Religion						2	2
National Origin						1	1
Familial Status	1				1	1	3
Disability					1	1	2
Total Bases	3		30	3	2	8	46
Total Complaints	2	0	15	3	2	5	27

Race was the most cited basis of discrimination reported, with 15 of those 21 cases occurring in 2013.

Twelve types of issues, or prohibited discriminatory acts, were reported by complainants to SCFHC. The largest share pertained generally to refusals to rent, sell, or negotiate housing or to otherwise make housing unavailable. Other issues, with a count of the complaints by each, are displayed in the table below.

Table 20. Savannah-Chatham County Fair Housing Council Complaint Data by Issue							
Issue	2011	2012	2013	2014	2015	2016	Total
Refusal to rent/sell/negotiate	2		15	2	2	3	24
Dispute buyer/renter qualifications			12		2	3	17
Refusal to transmit offer						1	1
Steering						1	1
Dispute prices/terms/conditions	2		15		1	3	21
Differential treatment	2		15		1	2	20
Dispute availability						1	1
Harassment/intimidation	2		14				16
Discriminatory advertising				2		1	3
Reasonable accommodation					1	2	3
Retaliation						1	1
Other (zoning)					1		1

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.**

N/A

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of resources for fair housing agencies and organizations
- Lack of local public fair housing enforcement
- Lack of state or local fair housing laws

VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Listed below are the fair housing issues with a prioritized list of contributing factors for each. The priority for the contributing factors was determined based on the degree to which the contributing factors have bearing on the fair housing issue; those with the greatest ability to impact the issue are listed first and those with less direct or immediate ability to remedy the named fair housing issue are listed last.

Segregation

Location and type of affordable housing
Private discrimination
Land use and zoning laws

R/ECAPs

Location and type of affordable housing
Displacement of residents due to economic pressures
Lack of private investments in specific neighborhoods
Impediments to mobility
Deteriorated and abandoned properties

Disparities in Access to Opportunity

Location and type of affordable housing
Location of proficient schools and school assignment policies
Impediments to mobility
Land use and zoning laws
Private discrimination

Disproportionate Housing Needs

The availability of affordable units in a range of sizes
Displacement of residents due to economic pressures

Publicly Supported Housing

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
Impediments to mobility
Source of income discrimination

Disability and Access

Lack of affordable, accessible housing in range of unit sizes

Lack of affordable, integrated housing for individuals who need supportive services
Lack of assistance for housing accessibility modifications
Lack of assistance for transitioning from institutional settings to integrated housing
Land use and zoning laws

Fair Housing Enforcement and Outreach

Lack of resources for fair housing agencies and organizations
Lack of local public fair housing enforcement
Lack of state or local fair housing laws

- 2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.**

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
1. Support a comprehensive regional affordable housing strategy	<ul style="list-style-type: none"> • Location and Type of Affordable Housing • Availability of Affordable Units in a Range of Sizes • Displacement of residents due to economic pressures • Siting Selection policies, practices and decisions for publicly supported housing, including discretionary aspects of QAPs and other programs • Lack of affordable, accessible housing in range of unit sizes • Lack of affordable, integrated housing for individuals who need supportive services • Lack of assistance for transitioning from institutional settings to integrated housing • Deteriorated and Abandoned Properties 	<ul style="list-style-type: none"> • Segregation • R/ECAPs • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing • Disability and Access 	<ol style="list-style-type: none"> 1. Form a diverse and inclusive Steering Committee to spearhead the effort (Q3, 2018) 2. Deliver a draft strategy for public review and comment (Q1, 2020) 3. Identify and charge responsible parties with strategy implementation (Q2, 2020) 	City of Savannah

Discussion: Working together with the Housing Authority of Savannah, Chatham County-Savannah Metropolitan Planning Commission, Coastal Georgia Indicators Coalition, Chatham County, and neighboring municipalities, the City of Savannah will participate and contribute appropriate staff and resources to a regional effort to develop a comprehensive affordable and workforce housing strategy. The strategy will consider such factors as the market demand for units of various types, sizes, and accessibility features; market pressures caused by gentrification and expanding areas of student or tourist-oriented development; the opportunities for the siting of multifamily and scattered-site single family housing in areas of opportunity throughout the region; protocols for expeditious resolution of blight, delinquent property tax, and cloudy title issues negatively impacting properties and neighborhoods in order to clear the way for residential rehabilitation or redevelopment; programs and incentives that can be offered to private sector developers to encourage participation in the retention and creation of affordable and workforce housing; and measures directed at substantially diversifying and increasing local government and private funding, including dedicated funding sources, that support the Savannah Affordable Housing Fund. The strategy will also consider ways to identify and diffuse negative perceptions and resistance from residents during its implementation.

<p>2. Foster opportunities for greater mobility of low- and moderate-income residents</p>	<ul style="list-style-type: none"> • Impediments to mobility • Source of income discrimination 	<ul style="list-style-type: none"> • R/ECAPs • Disparities in Access to Opportunity • Publicly Supported Housing 	<ol style="list-style-type: none"> 1. Partner with the Housing Authority of Savannah to hold an annual informational forum for landlords and property managers on the benefits of the HCV program and the obligations and responsibilities of tenants, landlords and the public housing authority under the voucher program (Annually, Q2 beginning 2018) 	<p>City of Savannah</p>
<p>Discussion: Savannah’s low-income residents tend to concentrate in areas of poverty and with low levels of opportunity. Understanding that not all residents wish to leave their homes and neighbors behind to move to other areas that may have greater opportunities and amenities, those residents willing to make such a move will be encouraged and supported through the transition. The Housing Authority of Savannah currently provides assistance to residents in evaluating their options and becoming established in a new community of choice. A proactive effort will also be made to expand the number of landlords and property managers who will accept tenants with Housing Choice Vouchers, particularly at properties in high-opportunity locations. Education for these parties on fair housing may be helpful as well as testimonials from their peers about the benefits of the HCV program.</p>				

3. Support local fair housing education and enforcement efforts	<ul style="list-style-type: none"> • Private discrimination • Lack of resources for fair housing agencies and organizations • Lack of local public fair housing enforcement • Lack of state or local fair housing laws 	<ul style="list-style-type: none"> • Segregation • Disparities in Access to Opportunity • Fair Housing Enforcement and Outreach 	<ol style="list-style-type: none"> 1. Conduct fair housing education workshops (Quarterly, beginning Q1, 2018) 2. Fund fair housing enforcement services (Annually, January); OR Establish a portal on the City's website for registration of fair housing discrimination complaints (Q3, 2017) 3. Stay abreast of fair housing regulations as they impact the City of Savannah's fair housing activities (Annually, beginning Q1, 2018) 	City of Savannah
<p>Discussion: The City of Savannah will provide on-going fair housing education, support for enforcement services, and web-based access for filing fair housing discrimination complaints. Fair housing education will be included as part of first time homebuyer education sessions and will include information on how to identify and avoid predatory loan products. A collaborative effort involving support from Chatham County and other regional partners will be considered to increase the potential impact of the City's investment. State law currently forbids any municipal ordinance from extending fair housing protections to any classes not specified in the federal Fair Housing Act. While source of income discrimination is an issue in Savannah, the City could not lawfully make it a protected class. Instead the City will monitor fair housing legislation at the state level for potential impacts on the City's fair housing activities.</p>				

<p>4. Improve existing low-opportunity neighborhoods</p>	<ul style="list-style-type: none"> • Lack of private investments in specific neighborhoods • Location of proficient schools and school assignment policies 	<ul style="list-style-type: none"> • R/ECAPs • Disparities in Access to Opportunity 	<ol style="list-style-type: none"> 1. Continue partnership with Community Housing Services Agency (CHSA) and public investments in Savannah Gardens Neighborhood Revitalization: 78 rental and/or ownership dwellings, \$10 M housing investment (LIHTC, Private, HOME), \$1 M City infrastructure investment (Phase-V: Begin 2019; end 2021) 2. Continue public space, streetscape and commercial corridor improvements on Augusta Avenue, including one pocket park, 2,000 linear feet of sidewalk, 15 ADA ramps, two transit shelters, one bus pullover (Phase 3: Begin 2017; end 2019) 3. Provide infrastructure investments to support the Hitch Village Phase II Neighborhood Revitalization: 100 rental dwellings, \$15 M housing investment (LIHTCs, Private), \$1.5 M City infrastructure investment (Begin 2017; end 2019) 4. Establish a neighborhood revitalization program: 	<p>City of Savannah</p>
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			<p>50 dwellings repaired/constructed, \$5 M in housing investment (Private, CDBG, HOME), \$250K in City-financed infrastructure improvements (Begin 2018, end 2020)</p> <p>5. Provide infrastructure improvements to support Waters Avenue Corridor/Enterprise Zone revitalization and Ramona Riley School adaptive reuse senior housing development: 57 rental apartments; \$5.5 M housing investment (LIHTC, Private); \$1.2 M City-financed infrastructure improvements (Begin 2017; end 2019)</p> <p>6. Meet with SCCPSS staff as needed to discuss opportunities to improve school proficiency in revitalization areas.</p>	
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Discussion: The City will continue to take steps to improve existing low-opportunity communities by investing in infrastructure improvements, partnering with non-profit housing providers and the public housing authority on neighborhood revitalization projects, and encouraging private investment and job creation in established Enterprise Zones along targeted economic development corridors. City staff will consult as needed with the Savannah-Chatham County Public School System regarding school proficiency in areas where focused revitalization is planned or is already occurring to jointly discuss ways of working together to improve both school conditions and the surrounding neighborhood. School attendance boundaries, sites for new schools, and placement of boundary-free open enrollment or lottery schools (such as charter or magnet schools) are among topics that may be discussed with an aim of providing equal access to high-quality education throughout Savannah.

<p>5. Offer information and services to increase housing options for people with disabilities</p>	<ul style="list-style-type: none"> • Lack of affordable, accessible housing in range of unit sizes • Lack of affordable, integrated housing for individuals who need supportive services • Lack of assistance for housing accessibility modifications • Lack of assistance for transitioning from institutional settings to integrated housing 	<ul style="list-style-type: none"> • Disability and Access 	<ol style="list-style-type: none"> 1. Host an informational forum on housing and accessibility modifications in partnership with local organizations that provide services to people with disabilities (Q2, annually beginning 2018) 2. Partner with the State of Georgia ADA Coordinator's Office to deliver a training session on fair housing accessibility issues to local code enforcement officials, design professionals and property owners (Q4, 2018) 	<p>City of Savannah</p>
<p>Discussion: The historic nature of many housing units in Savannah makes accessibility modifications especially challenging. The City will look for ways to partner with local organizations that assist people with disabilities with the cost and installation of accessibility modifications. Further, an information and referral service for people with disabilities seeking accessible housing or who may have questions about obtaining such housing will be explored.</p>				

<p>6. Review and amend City ordinances as appropriate to further fair housing choice</p>	<ul style="list-style-type: none"> • Impediments to mobility • Displacement of residents due to economic pressures 	<ul style="list-style-type: none"> • Disparities in Access to Opportunity • Disproportionate Housing Needs 	<ol style="list-style-type: none"> 1. Review the City's Crime-Free Housing Ordinance, Derelict Property Ordinance, and Zoning Ordinance to ensure compliance with Fair Housing Act standards and furtherance of fair housing choice (Q1, 2018) 2. Amend ordinances and policies, if necessary, to expand fair housing choice (Q3, 2018) 	<p>City of Savannah</p>
<p>Discussion: Two different City ordinances were described by stakeholders consulted in the AFH development process as being problematic and in need of reconsideration. The City's Crime-Free Housing Ordinance will be forwarded to the city attorney for review in light of updated 2016 guidance from HUD's Office of General Counsel regarding the application of Fair Housing Act standards to the use of criminal records by housing providers. The City's Derelict Property Ordinance will also be forwarded to the city attorney for review to ensure compliance with Section 818 of the Fair Housing Act. If necessary and appropriate based on the city attorney's review, the City will consider amendments to the ordinances to ensure greater fair housing protections and choice for residents. In addition, the City is in the process of updating its zoning code. Staff from the City's Community Planning and Development department will be engaged in the zoning update process to educate planners and others involved with the process about fair housing and advocate for changes that would expand fair housing choice.</p>				