

Atlanta Regional Commission
FY24 HUD Pathways to Removing Obstacles to Housing (PRO Housing)
Draft Application for Public Comment, 09/26/24
FR-6800-N-98

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Attachments

Attachment A Summary of comments received on published Application and list of commenters by name/organization.

Attachment B Certification of compliance with NOFO public participation requirements. Provide evidence of the reasonable notice of your public hearing and the publication of the application for public comment, consistent with Section VI.E of the NOFO.

Attachment C Advancing Racial Equity Narrative per Section III.F of the NOFO

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Introduction

The Atlanta Metropolitan region is experiencing some of the most extreme housing pressures in the nation. Atlanta's relative historical affordability helped drive population growth over the last decade and is now the 3rd fastest growing Metropolitan Statistical Area (MSA) in the country¹, adding almost 70,000 residents in 2023. The Atlanta metro market ranks #3 in the nation in home price appreciation² and #4 in the nation in rental cost appreciation³. In 2022, the Atlanta Fed listed the Atlanta Metropolitan area as unaffordable in its entirety, meaning that the median household income is no longer sufficient to purchase a median priced home. Housing is not an equitable resource in Metro Atlanta: Black or African American households are more likely to be cost burdened and to live further from job centers. From 2007 to 2016, the rise in investor activity caused a 1.4 percentage point drop in homeownership rates in metro Atlanta, and in 2024 investors bought \$1 billion worth of metro Atlanta homes⁴. A report from Georgia Tech, *Uncovering Neighborhood-level Portfolios of Corporate Single-Family Rental Holdings and Equity Loss*, reveals that in 2022, institutional investors owned one third of all single-family rental properties in metro Atlanta. Analyzing corporate SFR portfolios within Atlanta over 2010-2021, the report finds that a corporation is involved in about 70% of all SF transactions in majority-Black neighborhoods, double the rate of other neighborhoods. The quantified financial loss due to SFR investors equates to more than \$1.25 billion in lost equity within Atlanta neighborhoods over the recent decade⁵.

In response to immense regional housing challenges, cities and counties across Metropolitan Atlanta have made historic commitments and demonstrated progress. From urban centers to suburban and rural communities in the Atlanta Regional Commission (ARC) jurisdiction, progress includes creating new funding sources for housing; increasing public, private, non-profit and philanthropic collaboration across housing sectors; identifying pilot projects for housing; and modifying local policies to allow and incentivize diverse housing prices and types. The ARC seeks PRO Housing grant funding for regional, collaborative planning to implement and elevate initiatives at the local to the regional level. The result will be accelerated implementation of a greater mix of affordable housing options in the region, reflective of each community's specific housing needs, the launch of broader programs aimed at land banking and permanent affordability, and development of regional resources, tools, and research to address barriers to affordable housing production and preservation.

The ARC operates as the regional planning and inter-governmental coordination agency for the 11-county Atlanta region and operates as the Metropolitan Planning Organization (MPO) for a 20-county region. Housing affordability has been identified as a key goal for the region, one of the ARC's top three 2024 challenges and commitment areas with transportation and infrastructure. The ARC member jurisdictions, which include the 11-county Metro Atlanta region, include 3 priority jurisdiction counties and 31 places as identified by HUD for the PRO Housing Grant.

¹ U.S. Census Bureau, July 1 2022 to July 1, 2023

² Zillow, U.S. home price appreciation change from 2019 to 2024

³ Apartmentlist, 2018 to 2023

⁴ [Investor Home Purchases Rise for First Time in Nearly Two Years \(redfin.com\)](#)

⁵ *Uncovering Neighborhood-level Portfolios of Corporate Single-Family Rental Holdings and Equity Loss*; An, Polimeni, 2024.

Metro Atlanta desperately needs affordable rental housing and innovative home ownership models that offer permanent stability through development partnerships with local governments. Separately, local governments are laying the groundwork for housing through revising zoning laws and creating new programs and procedures. To position the metro Atlanta region to accelerate housing production and address affordable and fair housing need, ARC is partnering with the City of Atlanta and regional counties, municipalities and stakeholders to advance the following proposal to HUD to address the severe shortage of both market-rate and affordable housing that exists in our region and to address the inequities in wealth through stable housing and home ownership. The HUD PRO Housing Grant is vital to the region to activate these efforts and expand the regional scope of these successes.

Across the region, local governments are actively working to address our region's housing needs through revised laws and regulations. However, each municipality has arrived at similar barriers in their pursuit of housing progress:

1. *Lack of adequate and flexible funding at the municipal and county level for land and housing and lack of knowledge of Federal and State funds,*
2. *Need to identify and activate vacant, city or county-owned, school, faith-based, and other types of land, to establish and expand local land banks to acquire, hold, and transfer land for community benefit, and to activate targeted properties for affordable housing,*
3. *Need to build upon existing and create new Community Land Trust and shared equity partnerships and models for permanent affordability to address the loss of affordable units and provide community control over housing need, and*
4. *Need for additional regional research, resource development, and education to implement housing solutions regionally and beyond.*

Metro Atlanta is at a pivotal point in time where the local jurisdictions have momentum for housing programs and incentives. The ARC is equipped to align resources regionally to not only move the needle in the region, but to provide both research and technical support to advance housing capabilities and innovations. Together, ARC and its partner jurisdictions will pursue the following four strategies to boost production, improve affordability and stability, and collectively address the region's housing need by:

Increasing the supply of housing through identifying, enabling, and expanding local flexible funding sources. **Federal and State level:** research is proposed to examine best practices and educate on funding available at the Federal and State level, and how to activate these funds to accelerate the development of affordable homes beyond the use of LIHTC. **Local funding resources:** throughout the region, local jurisdictions have established or plan to establish housing trust funds but need support to identify recurring funding resources and to disburse funds through loans and grants. At least five cities and counties in the metro-Atlanta region have established Housing Trust Funds. The sophistication of programming and leveraging funds varies across the region and establishing best practices and additional sources is important to growing these resources. The PRO Housing grant will enable planning and technical support for setting up and expanding housing trust funds, determining additional sources of funding, and creating policies and programs for revolving loans and grants. Funding research will expand beyond housing trust funds to tax allocation districts and layering of local, federal, and state funding. Through technical assistance, this research and connectivity will help communities better fulfill the

Consolidated Plan's requirement of identifying barriers to affordable housing and implementing solutions to address these barriers, of which funding is a primary barrier. Through increasing funding resources, the region's non-profit home builders can keep the AMI costs of ownership and rental opportunities low and expand capabilities for smaller and minority owned developers.

Creating new affordable housing by identifying and activating vacant, public, and private land for housing. The PRO Housing grant will support expansion of land banks through technical support. This initiative will enable cities and counties to set up a new land bank or join an existing one, identify vacant or deteriorated land for the purpose of allocating to the land bank, develop a pipeline of parcels suitable and preferred for housing, and support pre-development work for pilot projects that will demonstrate success regionally. By identifying land suitable for affordable housing, moving land into a land bank, identifying funding, and incorporating planning to ensure housing is built to address need, the grant funding will address the goal to affirmatively further fair housing by addressing and removing barriers that perpetuate segregation, inhibit access to well-resourced areas of opportunity for protected class groups and vulnerable populations, and concentrate affordable housing in under-resourced areas.

Reduce the wealth gap and prevent displacement through expanding permanent affordability and shared equity models. The grant will enable municipalities and counties to build upon new and revised zoning laws to pilot innovative housing types that are permanently affordable through community land trust model, shared-equity, and non-profit partnerships. The PRO Housing grant will allow for technical support to establish or expand the capabilities of local community land trusts and shared-equity models, support pre-development work for targeted pilot projects that further fair housing objectives, and expand this model beyond its existing footprint. The shared-equity model in the Atlanta metro targets 80% AMI home ownership and between 30% and 60% AMI for rental units and satisfies the goal of affirmatively further fair housing by addressing and removing barriers that perpetuate segregation, inhibit access to well-resourced areas of opportunity for protected class groups and vulnerable populations, and concentrate affordable housing in under-resourced areas. By scaling up the CLT model regionally and to a wider geography (statewide or beyond), the proposed grant activities have the ability to satisfy the goal of facilitating collaboration and harnessing innovative approaches from jurisdictions, researchers, advocates, and stakeholders.

Expand regional research and resources, leverage community education and engagement to ensure progress is documented and replicable, and to inform policies and programs to a broader geography. The grant will fund research through these projects to increase efforts in the region to model successes regionally and statewide. Regionally, ARC will expand its resources by increasing the capability of the Metro Atlanta Housing Strategy to include documented successes of pilot projects and programs listed above, and to include model ordinances and pre-approved designs across the region to serve as models for communities. PRO Housing funding will also be used to develop an online platform to list, search, and apply for affordable housing options. This resource was piloted by the City of Atlanta and has momentum to expand regionally. This will institutionalize regional and local analysis and implementation of effective, equitable, and resilient approaches to affordable housing production and preservation, and help inform state-level proposals. These proposals also satisfy the goals of the proposed grant activities have the ability to satisfy the goal of facilitating collaboration and harnessing innovative approaches from jurisdictions, researchers, advocates, and stakeholders. Proposed grant activities will institutionalize state and local analysis and implementation of effective, equitable, and resilient

approaches to affordable housing production and preservation. Through the grant, ARC will provide technical assistance to help communities better fulfill the Consolidated Plan's requirement of identifying barriers to affordable housing and implementing solutions to address these barriers: lack of funding, lack of land, lack of ownership opportunities, and lack of education, and will connect residents to affordable housing opportunities and provide community based education.

This proposal is a collaborative effort to elevate programs and projects that add housing at the local level and expand housing choice and affordability through increased funding, research, and expansion of existing programs. Locally, jurisdictions will create and expand existing programs to enable housing to realize the zoning and policy changes that they have made, with the recognition that zoning is not the current barrier preventing accelerated housing supply and preservation. Regionally and beyond, increased collaboration, research, and knowledge sharing will inform future funding, programs, and policy recommendations. If successful, the program will accomplish four goals: facilitate innovation and harness innovations that model successes and resources regionally and statewide; increase housing production through new programs, funding, and partnerships led by local municipalities; affirmatively further fair housing by providing access to wealth building, access, and stability; increase resources and increase neighborhood buy-in to new housing options. ARC will coordinate efforts to ensure regional consistency and elevate pilot projects and best practices. ARC will focus on the geographies listed in the grant and will expand these successes and best practices to other jurisdictions through the established LCI and CDAP programs, which are leveraged through Federal funding and managed by the Community Development Department at ARC, thereby expanding the reach of the best practices identified through grant activities.

Exhibit B Threshold Requirements and Other Submission Requirements
Atlanta Regional Commission

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Threshold Requirements

1. Resolution of Civil Rights Matters

The Atlanta Regional Commission (ARC) does not have any outstanding civil rights matters.

2. Timely Submission of Applications

The ARC will submit application within the deadline of October 30, 2023.

3. Eligible Applicant

The Atlanta Regional Commission is an Eligible Applicant as detailed in section III.A subsection 25 (Others) and is classified as an Other eligible applicant as the Metropolitan Planning Organization (MPO) for the Atlanta Region.

4. Number of Applications

The Atlanta Regional Commission will submit one (1) application.

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The following illustrate progress and commitment to overcoming barriers and increasing affordability through new programs, laws, and regulation at the state level, in the ARC region, and by local governments.

State of Georgia

Rural Workforce Housing Initiative: In January 2023, the Georgia Department of Community Affairs (DCA) announced the newly established Rural Workforce Housing Initiative. The initiative is meant to spur the development of critically needed workforce housing across the state. The Georgia General Assembly approved \$35.7 million to start the initiative in the Amended Fiscal Year 2023 Appropriations bill that was signed into law in March 2023. Three counties in the Atlanta Regional Commission area, Cherokee, Forsyth, and Henry, are conditionally eligible for Rural Workforce Housing Initiative grants, intended address this shortage by incentivizing housing development and providing crucial infrastructure dollars⁶.

Georgia House of Representatives Study Committee on Regulation, Affordability, and Access to Housing Prepared in November 2022, the Georgia House Budget and Research Office published broad research on the housing challenges and potential solutions for the state. The report cites several *Drivers of the Housing Crisis*, including developers cost prohibition on building homes under \$300,000; the impact of institutional investor home purchases on rental prices; the need for smaller homes and missing middle housing and expenses associated with regulatory processes⁷.

Georgia Association of Land Bank Authorities The Georgia Land Bank Act passed in 1997 and has enabled new Land Banks to tackle vacancy and abandonment in an increasing number of communities. The **Metro Atlanta Land Bank** (MALB) is a model for the region and the nation. It was the fourth land bank to be established in the U.S., which now has over 300 land banks nationwide. The MALB is expanding to enable cities in Fulton County to join and sets the standard for regional models, particularly through pioneering a model for land banks that works closely with housing authorities, development authorities, cities, and local developers to provide technical assistance, legal expertise, and real estate support to improve the development of affordable housing.

Atlanta Regional Commission

ARC's leadership in housing has evolved over the past 15 years and in response to growing affordable housing challenges in Metro Atlanta. During the Great Recession ARC produced the Piece-by-Piece Initiative⁸, which focused on foreclosure prevention at a regional scale. ARC created the Equitable Transit-Oriented Development (TOD) program in 2011, which became the Transformation Alliance⁹, a broad partnership of organization from the private, public, and nonprofit sectors dedicated to creating thriving, mixed-income communities anchored by transit and linked to opportunities and amenities. The Transformation Alliance, initiated through grant

⁶ [Georgia Department of Community Affairs Launches Rural Workforce Housing Initiative | Georgia Department of Community Affairs \(ga.gov\)](#)

⁷ [Georgia Department of Community Affairs Launches Rural Workforce Housing Initiative | Georgia Department of Community Affairs \(ga.gov\)](#)

⁸ <http://www.piecebypieceatlanta.org/>

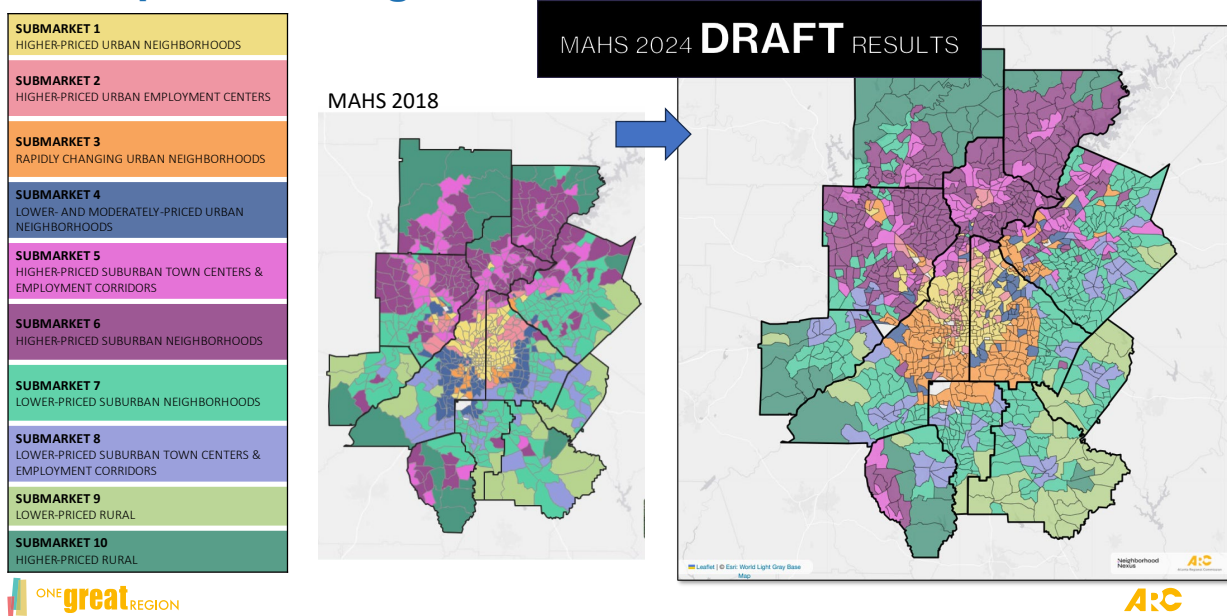
⁹ <https://atltransformationalliance.org>

funding awarded to the ARC, utilized funds to move forward policy for equitable TODs by developing the Equity Evaluation tool for measuring the value a development brings to a community and by catalyzing a regional commitment to Inclusionary Housing policies. In addition, the program spurred the creation of a new revolving loan fund through the Georgia Department of Community Affairs for regional affordable housing developments and which added points in the QAP for transit-oriented communities.

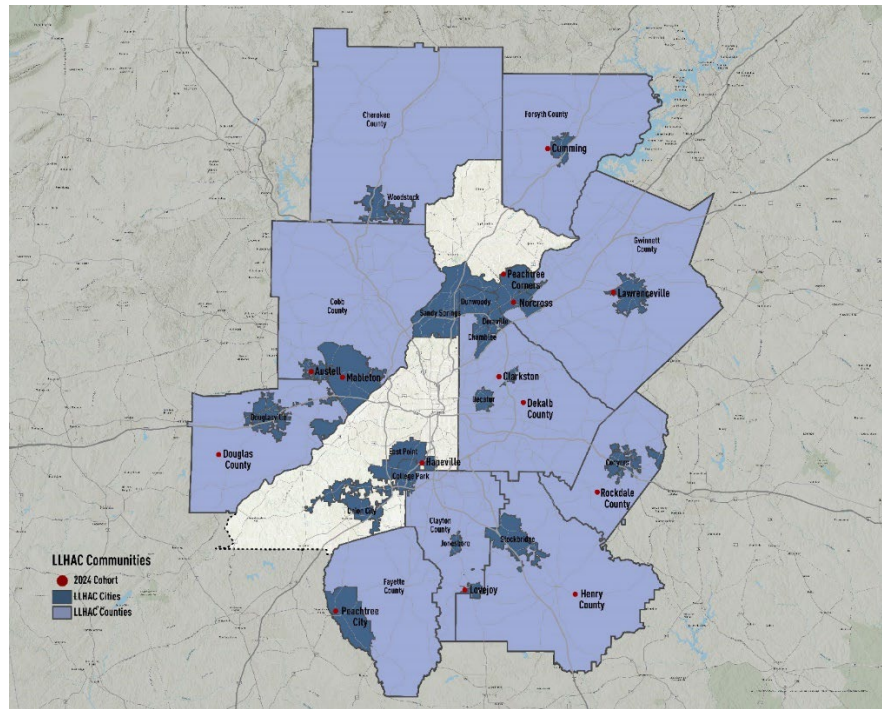
Metro Atlanta Housing Strategy The [Metro Atlanta Housing Strategy](#) is ARC’s regional housing tool that identifies regional challenges by housing submarket and provides strategies and tactics to address barrier through local and regional collaboration and assistance. The Metro Atlanta Housing Strategy helps local jurisdictions prioritize responses to housing need through six strategies that align with identified housing need: increase supply, preserve affordable supply, expand capital resources, stability existing residents, reduce housing and transportation cost, and develop leadership and collaboration on housing.

The Metro Atlanta Housing Strategy is undergoing a major 2024 update to the underlying housing submarkets and data that define the tool.

Data Updates: Progress Report | Revised Submarkets



ARC Local Leadership Housing Action Committee ARC also convenes and educates leaders throughout the region. In 2019, ARC created a new leadership program to focus on creating and preserving affordable housing in the region: the [Local Leadership Housing Action Committee \(LLHAC\)](#). The map below shows the locations of the mayors and commissioners who have participated in the LLHAC program.



Regional Housing Forum: In partnership with HouseATL and the [Atlanta Neighborhood Development Partnership \(ANDP\)](#), ARC hosts the [Atlanta Regional Housing Forum](#). The Forum is a quarterly gathering of affordable housing stakeholders from all sectors - private, public, nonprofit, philanthropic, and concerned citizens.

ARC Community Engagement Support Since 2012, the Atlanta Regional Commission (ARC) has staffed a [Community Engagement and Culture](#) team within the Community Development Department. ARC seeks to use arts and culture as a tool for inclusive and equitable engagement in communities across Metro Atlanta. Starting in 2024, the team engages quarterly cultural forums to support BIPOC artists and culture bearers working in communities on socially relevant topics such as affordable housing as well as to uplift awareness of the issues faced by communities in the Atlanta Metro region. This intentional work will help engage communities who may not have participated in public processes to add more diverse voices to the planning process. The PRO Housing grant, if awarded, will increase public engagement throughout the process by creative education based on culture and using arts to engage; providing early engagement and stakeholder identification; and facilitating outreach to community members.

Local Jurisdictions Housing Successes and Reforms

The Atlanta metropolitan area’s cities and counties are taking bold steps to address the shortage and the need for affordable housing, and PRO Grant funding, if awarded, would move the needle on many of the reforms underway and set the required programs and funding to accelerate housing production regionally.

The jurisdictions in the ARC region identified as partners for the grant have demonstrated progress in implementing housing solutions at the local level through enacted laws. Each has committed to increase affordable housing and home ownership opportunities, provide funding directed by the municipality to affordable housing, implementing land banks and/or shared

equity models to increase supply, and dismantling systemic challenges that stem from decades of segregation and unbalanced access to opportunity.

The identified jurisdictions share the goals which advance the primary aims of the PRO Housing NOFO:

1. Elevate and enable promising practices dedicated to identifying and removing barriers to affordable housing production and preservation, while preventing displacement, including through rewarding jurisdictions that have enacted laws and regulations that will lead to more affordable housing production and preservation;
2. Institutionalize state and local analysis and implementation of effective, equitable, and resilient approaches to affordable housing production and preservation;
3. Provide technical assistance to help communities better fulfill the Consolidated Plan's requirement of identifying barriers to affordable housing and implementing solutions to address these barriers;
4. Affirmatively further fair housing by addressing and removing barriers that perpetuate segregation, inhibit access to well-resourced areas of opportunity for protected class groups and vulnerable populations, and concentrate affordable housing in under-resourced areas; and
5. Facilitate collaboration and harness innovative approaches from jurisdictions, researchers, advocates, and stakeholders.

The following list includes progress in the priority geographies (cities and counties) indicated in the PRO Housing Grant:

City of Atlanta (Fulton County)

Atlanta has long been a hub for innovations in planning, financing, delivering, and operating affordable housing developments. Since 2022, the City has developed 5,844 units of housing affordable at 80% AMI or below, and another 4,075 are currently in some phase of development.

In 2019, the City passed the Housing Affordability Action Plan, which laid out a pathway to improve the leverage of City resources to support and stabilize affordable housing in the City. Since then, the City has established a 10-person Housing Policy team, located in the Executive Offices of the Mayor, which helps oversee coordination across City departments and other local public entities to streamline and expedite the delivery of affordable housing. In 2021, the City approved a Housing Trust Fund, allocating up to 2% of the General Fund for flexible funding for housing. These funds are programmed each year to support resident needs, housing production, and policy innovation. The City has also passed two \$100M housing opportunity bonds to provide strategic funding for housing priorities. Beginning in 2022, the City has taken a proactive stance on unlocking public land for comprehensive, complete, mixed-income housing developments. Its participation in the Putting Assets to Work incubator helped map and categorize the thousands of acres of publicly-owned land held by various public entities in the City's footprint. The City and its public partners have taken a much more proactive stance in predevelopment activities, working closely with community partners through the rezoning process and ensuring that by the time development activities begin, the value of the land has been maximally leveraged to support affordable housing. In 2023, the City and the Housing Authority incorporated the Atlanta Urban Development Corporation (AUD), a nonprofit subsidiary of the Housing Authority that serves as a co-development entity for public land

projects, unlocking new financial resources for developments and ensuring that developments are completed on time, on budget, and on mission. In addition to taking a more proactive stance on the development of public land, the City has improved transparency and collaboration with public, private, and nonprofit partners. The City's Housing Strike Force is a quarterly convening of decision-makers from key public and nonprofit agencies to track progress and coordinate efforts around key shared housing objectives, overcoming barriers related to silo'd activities between public partners. In February 2024, the City launched Affordable Housing Week, a week-long information and workshop session for local and national developers to understand how to access resources and navigate permitting for affordable housing development. The City established a prioritized permitting track for affordable housing developments, and continues to provide expanded opportunities for private partners to develop housing, removing red tape and other challenges for public developers. The City partnered with the Community Foundation of Greater Atlanta to establish the TogetherATL and GoATL funds, a combined \$200M of philanthropic funding, to support long-term affordable housing developments throughout the region. These funds help remove the barrier of a lack of quick-acting capital to close affordable housing deals, especially in a time of rising interest rates and construction costs. The city has legalized ADUs in many districts and seeks to provide pre-developed ADU plans to help promote development. The City also seeks to develop a Tenant Portal to link residents with the housing they need.

DeKalb County: DeKalb County includes the priority geographies of Chamblee, Clarkston, Decatur, Druid Hills CDP, Dunwoody, Gresham Park CDP, North Decatur CDP, North Druid Hills CDP, and Scottdale CDP. DeKalb recently passed a Cottage Ordinance and seeks to establish a Housing Trust Fund supported by general funds. The county recently passed legislation for a Housing Plan, and proposed reduction in the square footage of new homes in the two most common zoning districts. The county has established the DeKalb County Land Bank and seeks to establish a Community Land Trust. The county seeks assistance to identify a land pipeline for affordable housing and identification of funding resources to activate the land with affordable housing. The county redevelopment agency, Decide DeKalb, is in the process of research a housing bond program.

City of Clarkston (DeKalb County): The City of Clarkston, a priority geography, was the first city in the region to establish a Cottage Home Development called the Cottages on Vaughn. Clarkston is widely considered the most diverse square mile in America. The new pocket neighborhood, situated on a half-acre lot, a block away from downtown Clarkston, includes eight micro-cottage homes ranging from 250 to 492 square feet, a common green space for gathering, and climate-conscious development features such as solar panels and edible, and regenerative landscaping. In response to the project's success, Clarkston passed a Cottage Ordinance to approve cottage housing development citywide. In August of 2024, the Clarkston Council adopted the [Clarkston Greenway Study](#) to advance trail networks in the city. Due to concerns of displacement, recommendations within the report include development of financial incentives for affordable housing, partnerships, and creation of a Land Trust.

City of Decatur (DeKalb County) The City of Decatur, a priority geography, adopted a Missing Middle Housing ordinance in February 2023 to re-allow duplexes, triplexes and quadplexes in single-family residential districts. The ARC assisted with community engagement and data analysis to help move this ordinance adoption forward. In 2022, the city created a new home

repair program with technical assistance from the Atlanta Regional Commission through the Community Design Assistance Program (CDAP). The City of Decatur identified city-owned land suitable for affordable housing development and to be transferred to the Decatur Land Trust when complete. A pilot project, the Oak Cottage Court comprised of six small homes, was completed in 2024 and provides permanent affordability and home ownership ranging from 60-120% of area median income. Future projects include the development of 132 affordable rental units on city-owned land and in partnership with the Decatur Housing Authority for persons 0-100% of area median income. Decatur has identified parcels for which to build additional affordable housing to pilot new duplexes, triplexes, quadplexes, and ADUs. Decatur has identified the need for grant funded assistance to research additional funding resources for their Housing Trust Fund, technical support to set up policies and procedures to distribute funds from the Housing Trust fund, and technical support in the form of predevelopment costs to further identified projects in the city which will be kept permanently affordable under the land trust model.

Cherokee County: Cherokee County includes the priority geographies of Ball Ground city, Canton city, and Holly Springs city. The county hosts the Cherokee Housing Forum to convene cities in the county with a variety of housing stakeholders. Cherokee County is exploring creation of a Land Bank for the county that would enable cities to join as well. Currently, a large percentage of CBDG funds are awarded to Habitat for Humanity to create homes for low-to-moderate income families. The county needs assistance setting up the Land Bank and identifying sources of land, addressing tax delinquent properties.

City of Canton (Cherokee County): Canton, a priority geography, has created a forgivable down payment assistance program; zoning reform to allow ADUs and provide pre-approved plans, reduced permitting; zoning reform through adopted cottage ordinance; creation of a Housing Trust Fund and adoption of inclusionary zoning ordinance, which provided the funds for its first contribution. Canton has leaned into affordability programs and policies with the creation of the [Canton Housing Team](#) within the city government. The City of Canton has adopted a Cottage Ordinance and approved ADUs citywide. ADUs include an optional pre-designed plan for faster permitting and pre-design plan is free of charge to residents. Canton is in year two of the Georgia Department of Community Affairs GICH program and is conditionally eligible for Georgia Rural Workforce Development funds for infrastructure. Canton is working with Cherokee County to create a Cherokee County Land Bank. The city also seeks to create a Canton Land Trust and has identified two parcels of city-owned land for affordable housing for which they seek pre-development assistance and plan to apply for Rural Workforce Funds for infrastructure cost. The PRO Housing Grant, if awarded, would provide technical support for Housing Trust Fund resources and identification of other funding resources for housing; technical support for pre-development of city lots; technical support for development of land bank (Cherokee County) and land trust; and community education and engagement.

Gwinnett County: Gwinnett County, which includes the priority geographies of Berkeley Lake city, Grayson city, and Suwanee city, committed through LLHAC to explore the feasibility of applicable developer financial tools, for example, Low-Income Housing Tax Credits (LIHTC), Tax Allocation Districts (TADs), and Housing Opportunity Bonds. In 2022, the County launched an \$18 million notice of funding availability to provide financial incentives for affordable housing developments that produce homes that are affordable to households earning less than

65% AMI. Gwinnett County does not have a Land Bank but relies on Lawrenceville Housing Authority and the Gwinnett Housing Corporation (GHC) for land banking, and seeks to increase this capability. The county identified 5 parcels of 1-6 acres each for pilot projects.

Gwinnett Housing Corporation: The [Gwinnett Housing Corporation \(GHC\)](#) is a nonprofit development organization established by its parent company, the Lawrenceville Housing Authority (LHA), in 1997 with a mission to create sustainable housing opportunities for low- and moderate-income families in Gwinnett County. GHC has approved funding for an advisor to establish a land trust for permanent affordability. GHC identified 8 acres of land suitable for pilot projects for diverse housing types.

In 2022 Gwinnett Housing Corporation, in partnership with State Representative Marvin Lim, was awarded a [Justice 40 Capacity Building Grant](#) to assess the energy sustainability and affordable housing needs of unincorporated Norcross. In partnership with the Georgia Hispanic Construction Association and the Southeast Energy Efficiency Alliance, Gwinnett Housing Corporation was awarded a \$200,000 Drawdown Georgia Climate Solutions and Equity grant to develop a comprehensive federal investment and workforce development plan to benefit disadvantaged communities in one of the most diverse and under-resourced parts of Gwinnett County.

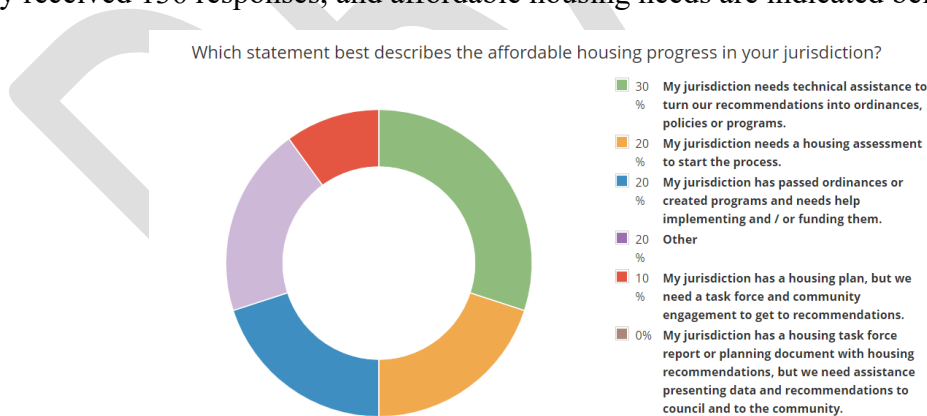
GHC created an offshoot, independent nonprofit LiveNorcross Corporation (LiveNorcross is an extension of our work with the City of Norcross and the Georgia Initiative For Community Housing program) for the purpose of becoming a CHDO (Community Housing Development Organization) and a CLT creator. We applied for the \$40K technical assistance grant under the LiveNorcross name.

Acute Need

Priority Geographies: The Atlanta Regional Commission 11-County area has three priority geography counties and 31 priority geography places identified due to the acute demand need for housing. Of the 31 priority geography places in the Atlanta Regional Commission's jurisdiction, 25 places are identified by the Offpace Factor (OF): affordable housing not keeping pace with population. In addition, 13 places plus 2 counties in the Atlanta Regional Commission jurisdiction are identified by the Housing Affordability Factor (HA), having a measure of insufficient housing. In the region, one county and one place are identified by the Housing Problems (HP) factor of having widespread housing burden or substandard housing. Grant funding, if awarded, will directly impact these priority geographies.

Priority Geographies	PRO Grant Measure			ARC MAHS Strategies #1 or #2		
	HA	HP	OF	Increase Supply	Expand Capital Resources	Preserve Affordable Housing
COUNTIES						
Fayette County	X			X		X
Forsyth County	X			X		X
Fulton County		X		X		X
CITIES OR TOWNS						
Ball Ground city			X	X	X	
Canton city			X	X		X
Holly Springs city			X	X		X
Lake City city			X	X		X
Morrow city			X	X		X
Fair Oaks CDP			X	X		X
Smyrna city			X	X	X	
Vinings CDP			X	X		X
Chamblee city			X	X	X	
Clarkston city			X			X
Decatur city			X	X	X	
Druid Hills CDP	X		X	X	X	
Dunwoody city	X					
Gresham Park CDP			X			X
North Decatur CDP			X	X	X	
North Druid Hills CDP	X		X	X	X	
Scottdale CDP			X	X	X	
Douglasville city			X	X		X
Brooks town	X		X	X		X
Fayetteville city			X	X		X
Peachtree City city	X			X		X
Tyrone town	X		X	X		X
Woolsey town	X		X	X		
Johns Creek city	X			X		X
Milton city	X		X	X		X
Sandy Springs city			X	X		X
Berkeley Lake city	X			X		X
Grayson city	X		X	X		X
Mountain Park city	X			X		X
Suwanee city	X		X	X		X
Lakeview Estates CDP		X		X		X

Outreach for Need Identification: To further assess needs in the region, the ARC distributed a survey via email, the *Housing Needs and Barriers Assessment*, to member jurisdictions. The survey received 136 responses, and affordable housing needs are indicated below:



Member jurisdictions were asked to select all needs that apply to their jurisdiction:

- **89% need to establish programs for housing land trusts, land banks, and/or housing trust funds.**
- **89% need to establish programs for homeowner stabilization.**
- **89% need to expand incentive programs for affordable housing.**
- **78% need to establish new community education and engagement efforts.**

- 78% need to establish policies and programs to address vacant and blighted properties.
- 78% need to develop tools and strategies to preserve existing housing.
- 67% need to develop or update housing plans, community development strategies, or zoning.
- 44% need help in property tax relief strategies for low to moderate income households.
- 33% need assistance in developing new by-right permitting procedures.
- 33% need assistance to reduce parking requirements, setbacks, lot sizes, or other.

Metro Atlanta Speaks Survey

- Six of 10 respondents to the 2023 ARC Metro Atlanta Speaks survey said they could not afford to move to another house or apartment in their current neighborhood. **Nearly as many said they could not afford to move anywhere in the metro Atlanta area.**

Acute Housing Demand in Metro Atlanta: The Atlanta Metro region is experiencing some of the most extreme housing pressures in the nation. The region attracted 67,000 new residents in 2023, the highest year of growth in almost a decade. Atlanta’s relative historical affordability helped drive population growth over the last decade and is now the 3rd fastest growing MSA in the country from 2000 to 2023¹⁰. Combined with supply-chain issues driven by COVID-19 and leading to higher construction costs, labor shortages in the construction industry, limited public/private dollars for affordable housing development, and local public policy that constrains supply, the development of new housing units has led to increases in rents and home prices wherein the Atlanta Metro market ranks #3 in the nation in home price appreciation¹¹ and #4 in the nation in rental cost appreciation¹². Growth in the region has grown outwards, and sprawl has increased traffic, air pollution, and transportation costs as residents move further out to afford housing.

Region	5-Yr Rent Appreciation*	5-Yr Home Price Appreciation*
Atlanta	38.5%	60.9%
Boston	25.3%	43.3%
Chicago	26.9%	35.3%
Dallas	29.8%	48.5%
Detroit	37.1%	40.6%
Houston	23.8%	40.4%
Los Angeles	26.8%	47.2%
Miami	57.4%	67.9%
New York	26.5%	33.8%
Philadelphia	27.6%	47.3%
Phoenix	44.1%	62.2%
Riverside	46.5%	56.7%
San Francisco	6.9%	25.6%
Seattle	24.8%	46.6%
Washinton	23.3%	32.4%

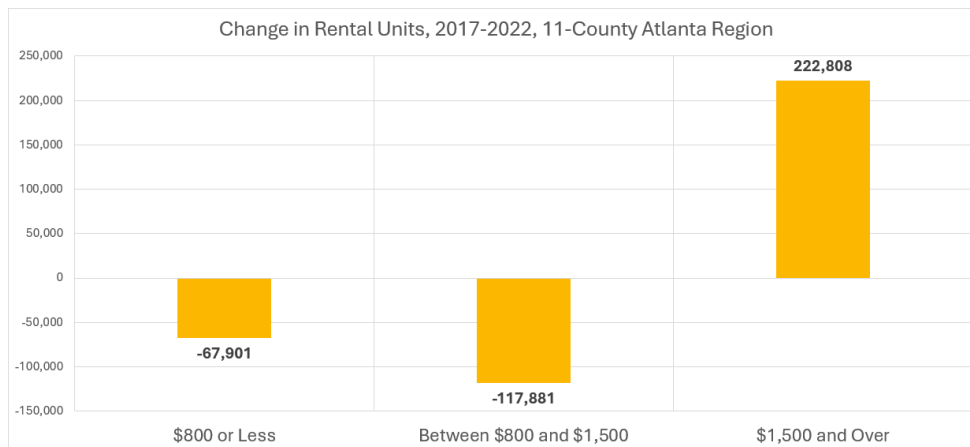
*Data from Zillow July 2019 - July 2024 (most recently available)

¹⁰ Data from ESRI

¹¹ Zillow, U.S. home price appreciation change from 2018 to 2023.

¹² Apartmentlist, 2018 to 2023

From 2016-2021, the Metro Atlanta region has lost close to 70,000 rental units priced less than \$800 per month and over 117,000 units priced between \$800 and \$1,500 per month.



Source: American Community Survey, 2017, 2022

In 2022, the Atlanta Fed listed the Atlanta Metropolitan area as unaffordable in its entirety, meaning that the median household income is no longer sufficient to purchase a median priced home based on the Atlanta Fed’s HOAM (Home Ownership Affordability Model). Overall homebuying slowed in 2023 because it was the [least affordable year](#) on record and there was a severe [supply shortage](#)¹³.

In FY2023, the Atlanta-Sandy Springs-Roswell, GA HUD Metro FMR Area Median income increased to \$103,500, a jump of over 25% from 2020. Median home listing prices in the Atlanta Metro have risen 63% over the last five years, compared with a 28% increase in per capita personal income. Median rent for a two-bedroom apartment in Atlanta Metro rose 77% from 2019 to 2022 while Atlanta hourly wages experienced just a 13% increase in the same period.¹⁴

The metropolitan Atlanta income divide between Black and White residents continues to grow. Using the average income from 2018-2022 Census data, White household have an average income of \$150,000 compared to Black households at \$84,254. According to an article published in 2019 by LendingTree, although more than 33.1% of the region is Black, less than 25% of the owner-occupied housing stock is owned by Black people. According to the article, Black residents own only 318,000 of the roughly 1.28 million owner-occupied housing units in the region.¹⁵ In 2022, the homeownership gap between Black and White residents in Metro Atlanta was 26.9%.¹⁶ At least 45% of renters throughout the 11-county EDD are considered cost-burdened (spending more than 30% of their household income on housing related expenses), according to the 2021 U.S. Census Bureau. Limiting the opportunity of Black households to live

¹³ [The Pandemic-Driven Migration Boom Is Waning, With the Share of Homebuyers Relocating at Lowest Level in 18 Months - Redfin Real Estate News](#)

¹⁴ Atlanta’s Quest for Homeownership: The Alarming Affordability Crisis. ESI Economics: Econsult Solutions, Inc. August 11, 2023. [Atlanta’s Quest for Homeownership: The Alarming Affordable Housing Crisis - Econsult Solutions, Inc.](#)

¹⁵ In diverse metro Atlanta, why are less than a quarter homes black-owned? (Keenan, S.). June 11, 2019.

¹⁶ The Black homeownership gap in Atlanta. Stacker. March 22, 2022.

in areas of high opportunity and limiting home ownership in newly-invested neighborhoods exacerbates the wealth gap and segregation.

The ARC uses income and cost burden to evaluate affordable housing needs in Metro Atlanta. The number of households with income less than \$50,000 and who are cost burdened is 324,177 owner-occupied households and 396,998 renter households¹⁷. Given the extreme capital cost of using grant funds to build new housing units to solve the region's affordable housing needs, the ARC seeks success through planning and technical assistance to jurisdiction to implement the core changes required to move the needle on allowing more housing. By enabling local jurisdictions to participate in the creation of affordable housing through incentives, housing trust funds, land banks, and shared equity models, and new resources to guide implementation, together with local leaders and stakeholders the ARC will identify a collaborative path forward that addresses regional housing challenges and possible solutions.

Expiring Subsidized Units and Loss of Unsubsidized Affordable Units: Loss of affordable housing strains households and can lead to displacement. The need for permanent affordability of affordable housing is revealed in the number of existing subsidized units that are subject to expiration in the coming years. The risk of loss of LIHTC properties in the Metro Atlanta region as they near Year 15 is more than 43,000 properties. Local jurisdictions will need assistance and partnerships to better understand and address the expiration of subsidized properties and the loss of unsubsidized properties, and to have access to funding to implement programs that provide permanent affordability, home repairs, and incentives for preservation. Since 2020, the 4% LIHTC has been competitive, representing a high demand for the program, and also highlighting the need for alternative delivery vehicles for affordable housing. The City of Atlanta, for example, determined that much of the City's efforts to develop affordable housing outside of LIHTC came after it recognized that the 4% program would not be enough to meet housing need.

Climate and Housing in Metro Atlanta

The Atlanta Regional Commission has launched its Regional Resilience Plan with an estimated completion by the end of 2027. The ARC recognizes that it must play a central role in sustainability and regional resilience and must hold much of the research centrally for local governments and stakeholders. As the region grows, ARC has forecasted the fastest growth to occur in outer counties. The fastest-growing counties in the 21-county region through 2050 are forecast to be Forsyth (79%), Barrow (71%), Paulding (60%), Cherokee (53%), Walton (51%), and Coweta (51%). Strong growth is projected in region's core, too: The region's five core counties (Fulton, Gwinnett, Cobb, DeKalb, and Clayton, are forecast to add a total of 812,000 people by 2050, representing nearly half of the region's total growth. ARC recognizes the Atlanta metro is less dense than many of our peer cities. Atlanta is 3,689 people per square mile, which is lower than Houston, Portland, Denver. The housing sector contributes to climate change: residential energy use and low-density land use patterns account for a significant share of the nation's greenhouse gas emissions, fueling the conditions that make climate hazards more frequent, severe, and threatening to communities across the country¹⁸. By aligning the Regional Resilience Plan with research on housing and climate included in the ARC's PRO Housing Grant

¹⁷ U.S. Census data, ACS 5-year, 2021.

¹⁸ [Preserving, Protecting, and Building Climate-Resilient Affordable Housing | Urban Institute](#)

application, the ARC will embed recommendations found in the HUD Climate Action Plan into ARC's work and resources.

Key Barriers

Key barriers have been identified by the ARC using three methods: 1) through targeted outreach to local jurisdictions, 2) through the ARC's Metro Atlanta Housing Strategy established in 2019 to identify key barriers in each city and county in the 11-County ARC Region, and 3) through barriers identified in the region's various Consolidated Plans. In addition, ARC engaged stakeholders through targeted meetings during the FY24 PRO Housing Grant application development and convened an information session prior to the public hearing. Community outreach has been consistently performed through ARC's Community Development Department and through the activities of grant partners The Guild, the Atlanta Land Trust, and the Decatur Land Trust.

Barriers revealed through outreach to local organizations: The ARC received 136 responses to its Housing Needs and Barriers Assessment survey to member jurisdictions.

The *Housing Needs and Barriers Assessment* also surveyed responses to the four key barriers facing the Atlanta region and listed below:

- 1) Lack of adequate and flexible funding for land and housing,
- 2) Insufficient programs to leverage vacant or city-owned land for housing,
- 3) Need to increase permanent affordability models, and
- 4) Lack of resources, research, education and broad community representation in housing policy decisions.

Each barrier is described below:

Lack of adequate and flexible funding for land and housing. The ARC *Housing Needs and Barriers Assessment* survey revealed that 89% of respondents need to expand incentive programs for affordable housing. In addition, 82% of respondents lack resources for housing. The Consolidated Plans for the Housing Authorities in the region cite the need for zoning and incentive programs, particularly the lack of sufficient incentive programs for private investments. Lack of funding was seen as a significant impediment to the availability of affordable housing. Lack of education and connection of small developers to local, Federal, and State funds was also cited as a barrier. Lack of funding was mentioned as a particular problem for organizations trying to develop group homes for persons with disabilities and for high-opportunity cities seeking to add affordable housing. This is supported by the ARC's Metro Atlanta Housing Strategy: reduce development cost and barriers to leverage public land; and to expand capital resources.

Insufficient programs to leverage vacant of city-owned land for housing. The ARC *Housing Needs and Barriers Assessment* survey revealed 89% of respondents need to establish programs for housing land trusts, land banks, and/or housing trust funds. This barrier is seen in the Metro Atlanta Housing Strategy under the need to increase supply and to leverage vacant or city/county owned land to build affordable housing. The Metro Atlanta Land Bank is a model for other municipalities, and several metro-Atlanta counties have started a Land Bank or are strongly considering this. The Metro Atlanta Land Bank recently opened its jurisdictions to all of Fulton County and invited cities within this county to apply. The City of South Fulton is the next city proposing to join the MALB. Regionally, consolidated plans cite the lack of supply of affordable

units and the high level of need for affordable housing, which is compounded by a shrinking inventory of affordable units. Population growth and influx of higher priced housing construction has created a high demand on a limited affordable housing supply, and a corresponding increase in the cost of rental and sales housing. By forming more local land banks and identifying pipelines of land suitable for affordable housing, local jurisdictions can turn vacant and underutilized land to community benefit.

Need to establish, support, and expand permanent affordability models. The ARC *Housing Needs and Barriers Assessment* survey revealed 89% need to establish programs for homeowner opportunities and stabilization. Shared equity models are at the forefront of homeowner stabilization and community participation in addressing housing need. Georgia was the birthplace of the first Community Land Trust in the U.S. – New Communities, Inc., and the model has grown in recent years in response to the housing shortage and racial wealth gap. The Atlanta Land Trust (ALT) was founded to increase the supply of affordable housing with an emphasis on gentrifying areas around the Atlanta BeltLine. The ALT is interested in expanding its capabilities to provide stewardship services for properties in other local Community Land Trusts and to provide increased technical assistance. The ALT works in collaboration with the Metro Atlanta Land Bank: the land bank identifies vacant and underutilized land, clears back taxes and titles, and offers land for sale at a discounted rate to the ALT. Since the formation of the ALT, two other local land trusts / shared-equity models have formed: the Decatur Land Trust and the People’s Community Land Trust and the Community Stewardship Trust. These models will serve to expand these different forms of shared equity models regionally. Various forms shared equity exist, including the community stewardship trust and the various housing cooperatives. The lack of new co-ops and co-ownership organizations indicate a loss of knowledge and a need for new education and outreach about how to set up these other models, not only among housing providers, but with banks, lawyers, accountants, insurance companies, and other entities. Consolidated plans throughout the region confirm the need for affordable home ownership, describing one primary barrier as the shortage of available units in areas of economic opportunity. Specifically, the rising costs of market rate homes and rental units increases displacement and hinders fair housing efforts, as indicated in the Consolidated Plans.

Lack of resources, education and broad community representation in housing policy decisions. The ARC *Housing Needs and Barriers Assessment* survey revealed 78% need to establish new community education and engagement efforts. A summary of regional consolidated plans lists the need for affordable housing education, and stakeholders and community members cited the perceived undesirable effects of affordable housing policies. Research and resources proposed include assessment and taxation of affordable land, legal and lending education for shared equity concepts, community engagement best practices and facilitation, and development of a regional Tenant Portal. Currently, there is no way for people to find affordable housing after it is built. Although we are streamlining the production of affordable housing, this does not necessarily make it easier for people to locate the high-quality homes that meet their needs and incomes. This is the motivation behind the Portal, which will also serve as a comprehensive data gathering tool for affordable housing decisions, centralizing data on supply and demand and making funding, financing, development, and policy decisions easier.

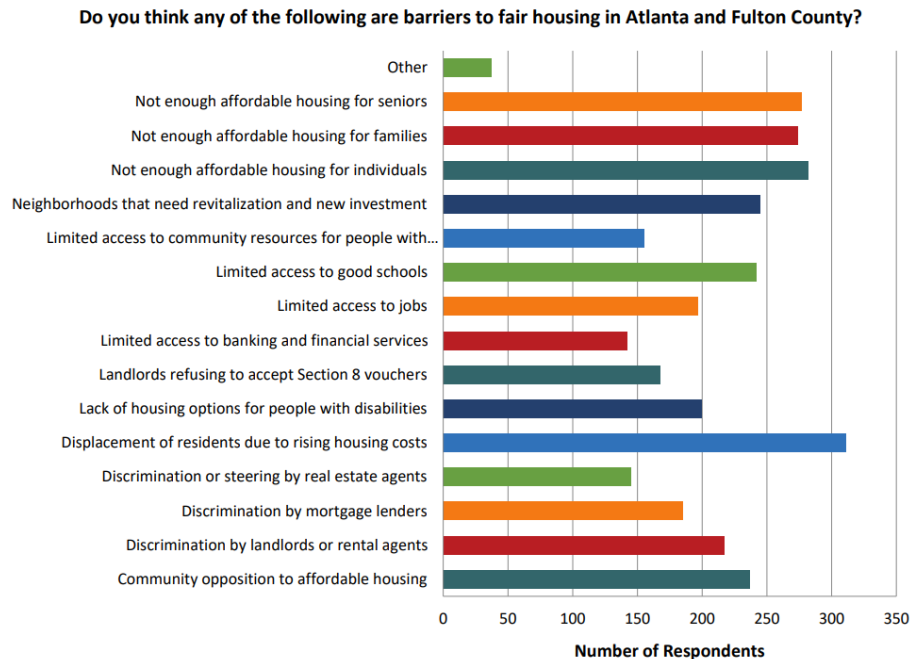
Consolidated Plans Need Identification / Fair Housing

2020 Joint Analysis of Impediments to Fair Housing Choice: Fulton County and City of Atlanta

This report cites availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups.

Community Survey: Five hundred and thirty-one people took the Housing and Community Development Survey conducted as part of this project. Housing needs most frequently identified as high needs by survey takers living in Fulton County include: elderly or senior housing, help buying a home / downpayment assistance, energy efficiency improvements to housing, grants to improve affordable rental housing/apartments, help for homeowners to make housing improvements.

FIGURE 2. FAIR HOUSING BARRIERS IN ATLANTA AND FULTON COUNTY FROM THE COMMUNITY SURVEY



Fulton County Consolidated Plan

- Fulton County identified the underserved needs as: affordable housing and homeownership opportunities, to encourage participating jurisdictions to review their zoning ordinances for prospective barriers to affordable housing development, and to make amendments as needed.
- Increase home ownership through down payment assistance.
- Address the shortage of available units in areas of economic opportunity.

DeKalb County Consolidated Plan

- Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources.
- Support the development of rental housing affordable to low- and moderate-income households, including projects located near employment, transportation, and other community resources.
- Address expiring subsidies: in DeKalb County, the rate of subsidized homes at risk is more than twice the national rate, with more than one in four publicly supported homes (27%) with an expiring subsidy with the next 10 years. DeKalb County 2024-2029 Consolidated Plan and 2024 Annual Action Plan estimates two-thirds of the county's subsidized units will be lost in the next 20 years unless their subsidies are renewed. The effect of expiring affordability periods can be mitigated through public refinancing options that allow owners of the subsidized developments to make repairs and renovations with low-interest loans that require the affordability requirements to remain in place.
- Increase affordable housing set-asides and provide financial incentives to supplement developer cost.

Cherokee County Consolidated Plan Cherokee County is currently developing its 2024-2028 Consolidated Plan and 2024 Annual Action Plan to guide investments in community and economic development, affordable housing, and homelessness assistance programs across the County. The Cherokee County Analysis of Impediments to Fair Housing Choice, April 2018, indicated that zoning laws were seen as significant impediments to the availability of affordable housing. This was mentioned as a particular problem for organizations trying to develop group homes for persons with disabilities.

Gwinnett County Consolidated Plan Gwinnett County is addressing the need for more decent and affordable housing by continuing to prioritize investment of funds into all of its housing programs; the plan cites need to identify, quantify and qualify new and existing affordable housing units. The effort requires comprehensive strategies and a variety of tools that can be used alone or in combination to reduce costs and increase availability. One of the main obstacles entitlement jurisdictions must overcome when attempting to develop affordable housing is negative perceptions of this type of housing. Opponents often conclude that affordable housing is always subsidized, project based, high-density apartments with unappealing facades that attract crime to the neighborhood. As a result, local residents often oppose affordable housing developments where they live.

Canton, Georgia Housing Update, 2022 Key Recommendations include to support pathways to homeownership through creation of a Down-Payment Assistance Program, increase housing education and counseling; to utilize the full spectrum of public funding sources; to strengthen relationships with state and federal representatives; to inventory of public funding sources; and to revisit strategic sites identified in 2020 Housing Assessment Strategy and evaluate need and options for specialized housing.

Exhibit D Soundness of Approach
Atlanta Regional Commission

DRAFT

What is your vision?

ARC recognizes that the common theme of the key barriers identified by member jurisdictions, and the Consolidated Plans in the region, include solutions that start in the planning process to make long-term, procedural, regional progress. Building from the vision of “One Great Region” and the vision and goals of ARC’s Comprehensive Economic Strategy (CEDs), Housing in the Atlanta Region should promote economic resiliency and prosperity for all residents and communities in the region, reinforce equity, and support innovation. The ARC projects population in the region will grow by over 1.8 million people by 2050. The housing crisis in the region will worsen unless we work together across jurisdictions in a coordinated, regional effort that ensures flexible funding at the municipal level, maximum use of available land, and programs to retain the affordability over the long term.

The geographies targeted in this grant proposal range from high-opportunity areas to disinvested areas that are experiencing rising land costs and investor interest. The eligible activities listed within each of the four goals below will address the four defined barriers. The grant will meet national objectives community development needs having an urgency and pose an immediate threat to health and welfare.

Goal 1: Increasing the supply of housing through identifying, enabling, and expanding local flexible funding sources. Throughout the region, local jurisdictions have established or plan to establish housing trust funds, tax allocation districts, and other resources. The PRO Housing grant will enable planning and technical support for setting up and expanding housing trust funds, determining additional sources of funding, and creating policies and programs for revolving loans and grants. Funding research will expand beyond housing trust funds to tax allocation districts and layering of local, federal, and state funding and leveraging funds for bonds and other resources.

1. **Developing new incentive programs for affordable housing development.** Allocate planning grants to enable local jurisdictions to develop housing trust funds, and to establish mechanisms for disbursing funds for affordable housing including revolving loan programs and forgivable grant programs. Municipalities within the region share the vision that the housing trust fund is a primary funding mechanism to allow local governments to participate in and partner on the creation and preservation of affordable housing. Each municipality understands that the Housing Trust Fund requires consistent funding to enable long-term housing creation, as well as the means to distribute the funds in alignment with regional best practices and local planning priorities. ARC will assist jurisdictions in developing new incentive programs and providing research on how to allocate and corroborate funding sources including federal and state.

Provide research for sources of funds that are recurring and can be dedicated to the housing trust funds. In alignment with technical assistance to create Housing Trust Funds and procedures associated with the fund distribution, the ARC will provide assistance to research potential sources of funding that can be allocated to the Housing Trusts. This research can be used to inform policies at the state level that may need to be modified to enable funds be diverted to local housing trusts. Thus, this goal has both local, regional, and statewide implications.

2. **Expanding existing affordable housing incentive programs to wider geographies, including high-opportunity neighborhoods.** Grants will provide research to ensure municipalities utilize all available funding that can be leveraged for affordable housing planning and development. Within this proposed research, ARC will consider all funding sources relevant to creating affordable housing at the local level including maximizing the use of CDBG funds for housing, utilizing Rural Workforce Housing Initiative Funds for infrastructure, potential or existing tax allocation districts (TIFs), and leveraging other resources to meet the goal. In addition, linking developers to available state funding through a regional resource model.
3. **Establishing loan or grant programs with affordability requirements or other mechanisms for rehabilitation of existing affordable housing units.** Flexible funding lessons learned include the understanding that the two primary sources of funds for local Housing Trust Funds are general funds and inclusionary housing in-lieu fees, but jurisdictions lack ample sources of recurring revenue for the trust fund from other sources. Cities and counties can start to fund the Housing Trust Funds, but need to establish the means to distribute funds and to ensure this aligns with planning goals for affordable housing and anti-displacement. Housing Trust Fund dollars will go further when leveraged with other resources, such as Housing Opportunity Bonds and partnerships with the local development authority and partners.
4. **Establishing tax-increment financing districts to fund infrastructure improvements or affordable housing development, especially those that incentivize affordable housing development.** Other potential funding sources include Tax Allocation Districts.

Lessons learned: Lack of funding is consistently expressed as a top barrier to affordable housing. Land and homes in the metro Atlanta market are in short supply and are ripe for purchase by investors. Small and minority developers suffer disproportionately from lack of funding. Local funding as well as education and access to State and Federal funds are needed. Locally, existing Housing Trust Funds are typically funded through allocations of General Funds, which may vary due to economic and political changes, and in-lieu fees, which are only allocated when a developer elects to provide fees instead of building affordable units. Across the region, in-lieu fees have struggled to meet the needs for funding and general funds are subject to many factors. Dedicated funds that can be consistently allocated to Housing Trust Funds are needed for greater impact. In addition, research and education is needed on other funding resources, including TADs, CDBG, HOME, New Market Tax Credits, and Bonds, as well as linking developers to state and federal funding. Potential areas of research are on the successful implementation and need to expand suballocations of New Market Tax Credits, which have helped ANDP build 260 homes through four allocations of \$44.5 million. These are flexible funds and ANDP allocates proceeds into a down-payment assistance program for owners at 80% AMI or below. The goal for research on this proven model and is to study additional funding needs, including other U.S. Treasury Funds the Capital Magnet Fund the CDFI Fund, to affect increasing housing supply. There has been some initial research done and statistics generated, but local partners including ANDP could inform the use and need for New Market Tax Credits for homeownership, and inform future opportunity to increase funding for these programs and collaborate with other organizations. Smaller developers, including Urban Oasis and MicroLife and other small and minority developers could be targets for programming informed by this research.

Goal #2: Create new affordable housing by identifying and activating vacant, public, and private land for housing. The PRO Housing grant will support creation and expansion of Land Banks through technical support. This initiative will enable cities and counties to set up a new land bank or join an existing one, identify vacant or deteriorated land for the purpose of allocating to the land bank, develop a pipeline of parcels suitable and preferred for housing, and support pre-development work for pilot projects that will demonstrate success regionally. Eligible activities below will be considered as part of Goal #2:

1. **Establishing incentive programs or flexibilities to enable and promote the adaptive reuse of vacant or underutilized properties for housing or mixed-use development.** Technical support to identify and evaluate land pipelines for affordable housing. Building capacity to do this work through creating a new land bank, joining an existing land bank, or enabling land banking by a local partner including a housing authority, or city/county.
2. **Developing proposals to update zoning or incentives to facilitate affordable housing on land owned by faith-based organizations.** Identify pilot projects and provide technical support for pre-development work. Align new programs and entities with local Development Authorities, Housing Authorities, and partners to leverage funds and programs to highest use. Identify locations for innovative housing types. Provide community education and engagement.
3. **Facilitating the conversion of commercial or other properties to new housing** including vacant and tax delinquent properties, code violations, underutilized land.

Lessons Learned: The Metro Atlanta Land Bank is in its 30th year of operation and is expanding its footprint outside of the City of Atlanta. Because Fulton County no longer has unincorporated land, the Metro Atlanta Land Bank seeks participation from the 15 other cities in Fulton County, and is in the process of approving the City of South Fulton. Lessons learned include the politics of regional collaboration when city and county goals are not in alignment. The City of Atlanta is piloting many innovative projects through the Atlanta Urban Development Corporation (AUDC), in partnership with Atlanta Housing and the Metro Atlanta Land Bank. The City understands that it must help drive new affordable housing supply by developing funding controlled by the city and expanding capacity to identify public land and partnerships. Other cities and counties have also come to this conclusion and understand the need to control the land for housing and community benefit.

Goal #3: Reducing the wealth gap and preventing displacement through expanding permanent affordability. The grant will enable municipalities and counties to build upon new and revised zoning laws to pilot innovative housing types that are permanently affordable through community land trust model and non-profit partnerships. Our value as a region is to see more permanently affordable options, provide stability, management and ownership that is based on community goals and needs. Georgia is the home of the first Community Land Trust, and the metro Atlanta area has three established Community Land Trusts: the Atlanta Land Trust, the Decatur Land Trust, and the People's Community Land Trust operated through The Guild. This goal will be implemented through the grant by:

1. **Providing large-scale technical assistance to affordable or non-profit developers, community land trusts, or other entities which leads to the development of affordable housing.** Provide for the creation of a Southeast Regional Land Trust Coalition, enable the Atlanta Land Trust to provide stewardship services to other CLTs. Enable the People's Community Land Trust to provide lender education and best practices to a broader community. Convene regional land trusts and shared equity models. Provide research on tax assessment of CLT properties
2. **Creating anti-displacement policies and prevention measures, such as limitations on property tax increases for low-income homeowners near new development, ensuring the affordability of new developments, and relocation assistance.** Development of long-term resources to reduce costs for shared equity properties, including the creation of a guidebook for tax assessments of non-profit and shared-equity properties.
3. **Capacity building for non-profit entities seeking to pool resources, engage landlords regionally, work more cooperatively, undertake joint housing rehabilitation programs, or merge operations.** Provide for community and partner education, particularly on connecting lenders with existing HUD financing programs to lower project interest rates. Establishing repair programs for existing shared-equity properties through research, partner and funding identification that enable workforce development.
4. **Providing technical assistance to community land trusts or other entities which leads to the preservation of affordable housing.** Provide for community and partnership education. Including pre-development costs, programming to assist in purchasing land bank property at a reduced cost for targeted projects and researching new funding mechanisms for CLTs.
5. **Preserving affordable housing in segregated, high poverty neighborhoods as part of a larger revitalization plan which improves conditions and eliminates disparities in access to opportunity between residents.**

Lessons learned: The Atlanta Land Trust was established in 2007 to address gentrification around the Atlanta BeltLine, and the Metro Atlanta Land Bank has a permanent Board seat on the ALT. The ALT has 60 homes in management, 100 in construction or permitting, and 170 that they control but are not currently working on. The ALT serves as a way for owners to build equity: 63% of CLT owners use equity from their CLT home to purchase a market-rate property. The Atlanta Land Trust is participating in a Permanent Affordability Pilot wherein the Metro Atlanta Land Bank agrees to sell land to the Atlanta Land Trust at a reduced rate in exchange for permanent affordability and hopes to expand this program. The ALT also partners with private developers in exchange for managing a percent of affordable homes in the development. Lessons learned include the missed opportunity to purchase land around the BeltLine, a public investment project, prior to investors. The need for increased financial tools and funding is also a barrier, and consistent tax assessment and alignment of assessments with affordability is needed. Consistent and broad lender education is needed to increase the pool of lenders for CLT homes.

The Guild launched in 2015 at the East Lake Commons as the first co-living model in Atlanta. The focus of The Guild is to uncover and address the root causes of systemic inequality,

specifically through addressing the racial wealth gap. As capital returns to disinvested portions of Atlanta, communities living there do not have agency over the changes and face displacement. The Guild operates two innovative models: the Community Stewardship Trust, the first in Atlanta to pilot shared community ownership of commercial and residential properties, and the People's Community Land Trust (PCLT), the first to purchase a rental property to stabilize rents. The strategic partnership of the PCLT signifies a commitment to addressing the myriad challenges low and moderate-income residents face in Atlanta, and of the growing, strengthening housing ecosystem in the city. Lessons learned include the need for fast capital including lines of credit, and programming to ensure CLTs and specifically target projects in Black neighborhoods facing gentrification, can purchase Land Bank properties at a reduced rate. The need for lender and financial education to help small concept land development, the need for large-scale community development is seen through the success of the [Solidarity Summer](#) community education pilot to help community members learn about shared equity and how they can participate for long-term gain.

The Decatur Land Trust's barriers include expensive land, lack of land, the need for assistance with predevelopment costs on city-owned land, property taxation, and developing HOAs for management of DLT homes. The DLT has an opportunity to increase its pipeline through increased partnerships – with the City Schools of Decatur and the Decatur Housing Authority.

The impact of shared-equity on low-and-moderate income is the cornerstone of this recommendation. The first pilot project of the DLT homes were offered for sale at 100% AMI. The PCLT rentals at 379 Elm are all 50% AMI. And the PCLT single family home rental is at 30% AMI. When units transition into ownership, the PCLT to sell homes at 30 - 50% AMI. The units at 918 Dill Ave are all a mix of 60% and 80%AMI. The median income in the Capitol View neighborhood is close to \$60K, in comparison to the Atlanta metro median income of \$106K this year. We try and reach deeper affordability to be commensurate with the incomes of the legacy residents of the neighborhoods. The ability of this organization facilitate the purchase of existing homes and rental units for community control is an important and expandable model.

The Atlanta Land Trust serves low-and-moderate homeowners by co-creating solutions with the South and West Atlanta BeltLine Corridor neighborhoods to create 150 affordable units at 80% AMI with some at 60% AMI. The ALT plans to develop multifamily rental site by the end of three years in partnership with nonprofit and/or for-profit developers. The CLT model enhances and extends pre- and post- homeownership stewardship and education services, leveraging partners to create successful homeowners and neighbors with shared equity and reduce racial disparities.

These models are starting to scale up and are providing important lessons for future development. To accelerate knowledge sharing, funding development, and local land trust development, two important activities are proposed in the grant: the development of a Southeast Regional Land Trust Coalition, and the growth in the ALT's practices to provide stewardship services to smaller land trusts. The grant also proposes community education to increase buy-in on CLT properties, and research to remove barriers identified in the lessons learned.

Goal #4: Expand regional resources and leverage engagement work to ensure progress is documented and replicable, and to inform policies and programs to a broader geography. The grant will fund research through these projects to increase efforts in the region to model successes regionally and statewide. The following eligible activities are part of Goal #4:

Creating affordable housing planning resources for member jurisdictions: The ARC proposes regional resources development so that cities and counties who want to create funding mechanisms, land banks, and community land trust have access to best practices. The ARC will also incorporate lessons from the pilot projects proposed herein to inform model ordinances hosted at the ARC as part of the Metro Atlanta Housing Strategy tool. In addition, the grant will fund research as a resource to address barriers identified: property assessment and taxation of CLT properties and affordable housing, lender education for CLT property sales, management structures for CLTs including HOAs, and development of policies and programs for the purchase of strategic Land Bank properties at a reduced rate for CLTs and shared-equity models. In addition, the grant will fund creation / expansion of City of Atlanta Tenant Portal.

Linking Goals with City and County Needs

Organization	Housing Trust Fund	Land Bank	Community Land Trust	Identify Land Pipeline	Predevelopment Costs	Funding Research
DeKalb County	X	X		X	X	X
Cherokee County		X		X	X	
Gwinnett County	X			X	X	X
City of Atlanta (Fulton)					X	X
City of South Fulton (Fulton)		X		X		
City of Clarkston (DeKalb)	X	X	X		X	X
City of Decatur (DeKalb)	X		X		X	X
City of Canton (Cherokee)	X	X	X	X	X	X
Gwinnett Housing Corporation		X		X	X	
Total	5	6	3	6	7	6

Atlanta Regional Commission: ARC will provide research and technical support through staff and contractual agreements, including 1) education and centralized resources for funding programs (local, federal, and state) for affordable housing developers intended to ensure small and minority developers have access to funding that is not LIHTC, 2) research to create regional best practices for land assessments for non-profit and CLT property taxation, 3) Lender education for shared-equity models. ARC will also 4) support housing education across the region through local working groups, educational materials, and convenings. Lastly, ARC will 5) track and host regional best practices including model ordinances, housing successes through its Metro Atlanta Housing Strategy.

City of Atlanta: Funding for two projects: 1) to support the creation and regional expansion of a Tenant Portal. Currently, there is no way for people to find affordable housing after it is built. Although we are streamlining the production of affordable housing, this does not necessarily make it easier for people to locate the high-quality homes that meet their needs and incomes. This is the motivation behind the Portal, which will also serve as a comprehensive data gathering tool for affordable housing decisions, centralizing data on supply and demand and making funding, financing, development, and policy decisions easier. Project 2) ADU Design-Build procurement for pre-approved designs. Grant funding would pay for for 3-4 high quality modular ADU designs and possibly necessary predevelopment work for qualifying homeowners. This responds to the challenge that ADUs require a level of sophistication that many homeowners do

not have, but streamlining the design and building process may help us actually get them built, despite the fact that they have been legal for a few years now.

DeKalb County: Technical support to establish a Housing Trust Fund and research funding sources as a potential to leverage bonding. The Housing Trust Fund will require policies and procedures to allocate funding to projects. DeKalb seeks grant assistance to develop procedures and capacity for the DeKalb Land Bank, to identify a pipeline of land for the land bank, and to fund the predevelopment of identified pilot projects to showcase innovative housing.

Cherokee County: Technical support to establish a Land Bank, identify a land pipeline, and pilot county projects using predevelopment funding.

Gwinnett County: Technical support for a feasibility study for a Housing Trust Fund, identify land pipeline, and predevelopment costs for five identified parcels.

City of Clarkston: Technical support and research for established Housing Trust Fund, research for additional funding resources, establish policies and procedures to allocate funding to affordable housing, potentially join the DeKalb Land Bank, and establish a Land Trust for anti-displacement and preservation as well as to establish new home ownership opportunities.

City of Decatur: Research on funding opportunities for Housing Trust Fund, technical support to establish mechanisms for allocating funds to affordable housing, research to assist the Decatur Land Trust, and pre-development of city owned land for housing.

City of Canton: Technical support, policies and procedures created to join the Cherokee Land Bank (when established), identify land pipeline, identify funding resources for the Housing Trust Fund and establish procedures to allocate funding, feasibility for a Land Trust, and pre-development work for two identified pilot projects.

Gwinnett Housing Corporation / Live Norcross Corporation: Technical support to establish a Land Trust, pre-development work for eight identified parcels.

Linking Goals with Land Trust / Land Bank Needs:

Organization	Land Bank Land Pipeline	Predevelopment Costs	Programs and Policies
Atlanta Land Trust	X	X	X
People's Community Land Trust	X	X	X
Decatur Land Trust		X	X
Metro Atlanta Land Bank	X		X

Atlanta Land Trust: The Atlanta Land Trust has identified three primary activities that will benefit the region and beyond through PRO Housing grant funding: 1) Establish a Southeast Regional Community Land Trust Coalition, 2) create and expand the Atlanta Land Trust Stewardship Services model, and 3) accelerate supply of permanently affordable homes through technical support and pre-development assistance for target properties not yet activated.

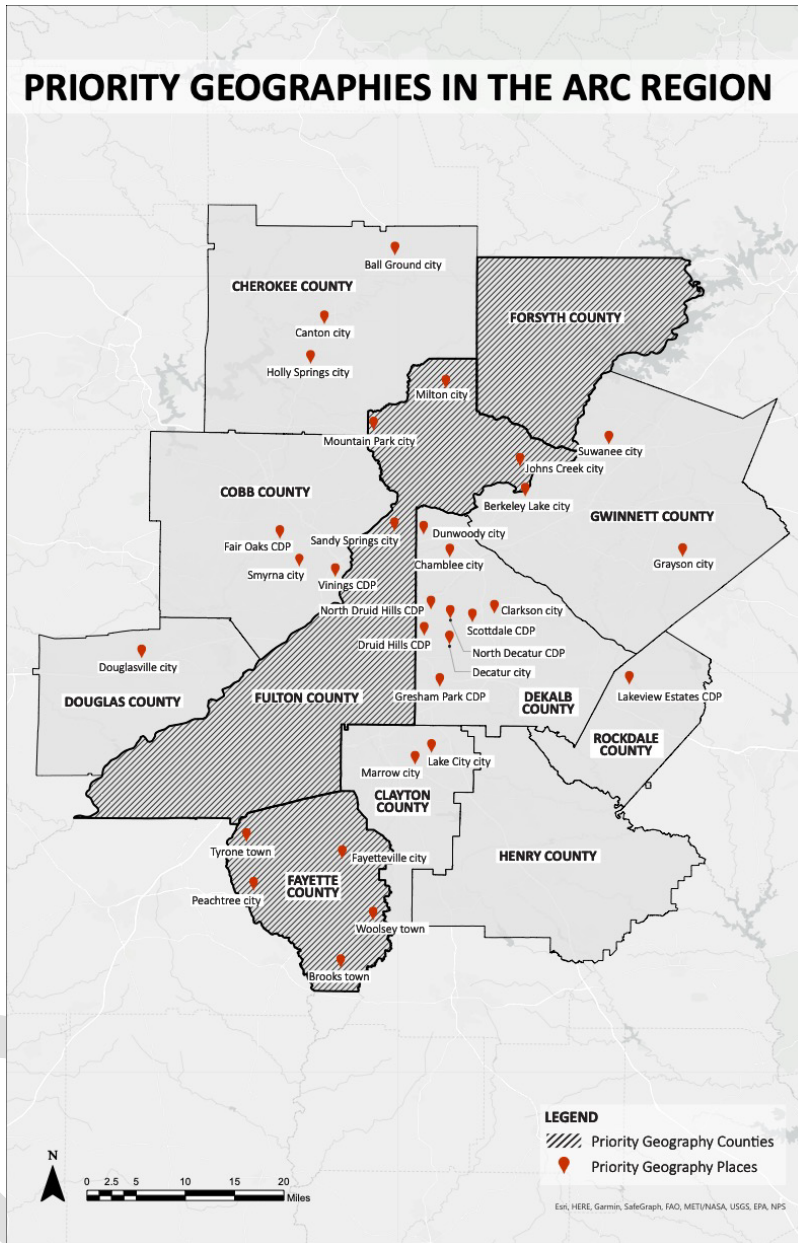
Decatur Land Trust: The Decatur Land Trust has identified two primary activities to assist future projects: 1) Accelerate supply of permanently affordable homes through technical support

and pre-development of strategic projects, and 2) research best practices and funding for long-term maintenance and management of DLT properties.

People's Community Land Trust: The People's Community Land Trust has identified four primary activities to build programs to stabilize residents and expand the shared-equity model best practices to a wider geographical region: 1) Education to address a lack of knowledge of regional CDFIs about HUD Programs including the 223(f) and 213 programs which can help to lower interest rates for project funding, 2) increase community education and large-scale engagement, 3) land pipeline identification and pre-development of properties for shared equity, and 4) developing an ongoing repair programs for existing co-ownership models that will also expand workforce development and partnerships.

Metro Atlanta Land Bank: Facilitate the creation of active land banks in the region. 1) Assist local jurisdictions with policy and procedural infrastructure to create a land bank in conjunction with the Georgia Association of Land Bank Authorities, 2) technical support for associated legal assistance, 3) technical assistance for property pipeline development, 4) education for local governments, community, and stakeholders for how land is brought into the land bank and establishment of guidelines and support for the land banking processes.

What is your Geographic Scope: The map below illustrates the Atlanta Regional Commission's 11-county region in the State of Georgia, and the location of the HUD Pro Housing identified priority geographies in the region. This proposal, however, reaches beyond the ARC's geography. Through research the grant will enable consolidated best practices and resources that help move the needle statewide. The expansion of the Community Land Trust model into the Southeast Regional Land Trust Cooperative would include adjacent states and is informed by best practices seen in other regions of the United States. The Burlington Associates group as well as Grounded Solutions Network are poised to assist with this work.



Who are your key stakeholders? How are you engaging them?

The list of ARC’s key stakeholders is listed below and includes local government staff and elected officials, non-profit directors and builders, and housing authority representatives. Each has a stake in creating and preserving affordable housing in the metro Atlanta region and have built this into their planning goals, mission statements, and objectives.

Outreach for the purpose of the grant has been through multiple stakeholder meetings and email correspondence, as well as a stakeholder information session held on September 12, 2024 and a public hearing held on September 26, 2024. In addition to engagement for the grant, ARC interacts consistently with stakeholder through its planning activities and community engagement and education programs. Through the LCI and CDAP programs, ARC embeds its staff in communities through stakeholder committees and community engagement. The Culture

and Community Design program provides forums for a diversity of engagement activities centered around racial and cultural inclusion. ARC is widely seen as the regional convener for issues impacting the region. For example, ARC is named in the recent ULI report *Housing at its Core* (2023) as the most likely regional convener for policy and educational resources to move the needle on housing in the region.

Key Stakeholders

Local Jurisdictions: City of Atlanta, DeKalb County, Cherokee County, Gwinnett County, Canton, Clarkston, Decatur.

Non-Profit Partners: The Atlanta Land Trust, Decatur Land Trust, The Guild which established the People's Community Land Trust, and the Metro Atlanta Land Bank.

Small-Scale Housing Developers: MicroLife Institute, Urban Oasis Development

Regional Partner Organizations: ARC has partner organizations who assist and collaborate as stakeholders: the Georgia Department of Community Affairs (DCA), the Atlanta Neighborhood Development Partnership (ANDP), Enterprise Community Partners, the Federal Reserve Bank of Atlanta, the Georgia Conservancy, Habitat for Humanity, and ULI Atlanta.

Habitat for Humanity: Barriers include zoning and property taxation. Habitat seeks to expand housing types to include duplexes and townhomes in addition to the traditional single-family model. Flexible funding from local jurisdictions would help reduce the time for cash flow for Habitat projects and increasing technical assistance would reduce costs. Habitat for Humanity holds owner mortgages for 30 years and the majority of owners are long-term. Habitat retains a right of first refusal to purchase homes.

Georgia Department of Community Affairs (DCA)- As the State's housing agency, DCA's goal is to provide every Georgia citizen the opportunity to have access to safe and affordable housing, no matter their community or income. DCA works with local governments, housing authorities, for-profit and non-profit developers, community groups, and landlords statewide to meet the housing and community needs of all Georgians. DCA also operates the Georgia Initiative for Community Housing ("Initiative" or "GICH") offers communities a three-year program of collaboration and technical assistance related to housing and community development. The objective of the Initiative is to help communities create and launch a locally based plan to meet their housing needs.

Enterprise Community Partners channels their work into six impact areas that make the greatest difference for systems, people, and communities across the country: Preservation & Production, Racial Equity, Resilience, Upward Mobility, Partner Sustainability & Growth, and Resident Success. Tools available through Enterprise Community Partners are their Preservation Next Training Academy and their Capital Resources for Small to Medium Multifamily Acquisition and Rehabilitation pilot program. In addition, and in partnership with Enterprise Community Loan Fund, Preservation Next will launch a pilot small to medium multifamily loan product targeted towards the financing needs of this critical stock.

The Atlanta Neighborhood Development Partnership (ANDP) develops, finances, and advocates for affordable housing at scale that promotes racial equity and healthy communities where families thrive. ANDP was created in 1991 as a result of the merger of the Metropolitan Atlanta Chamber of Commerce’s Housing Resource Center and the Atlanta Economic Development Corporation’s Neighborhood Development Department. ANDP is building affordable homes through public/private partnerships in the City of Decatur, City of Atlanta, and ANDP launched an unprecedented project to develop or preserve 2,000 affordable apartment units and single-family homes by 2025.

The Urban Land Institute (ULI) Atlanta ULI Atlanta has over 1,400 members throughout the Atlanta region and its broader geography which includes the entire state of Georgia and eastern Tennessee. ULI Atlanta is one of the largest and most active District Councils in the United States and brings together leaders from across the fields of real estate and land use policy to exchange best practices and serve community needs.

The Georgia Conservancy is a statewide, donor-supported conservation organization. It recognizes the connection between the environment, the economy and equity. Since its founding in 1967, Georgia Conservancy and its supporters have ensured the protection and conservation of some of Georgia’s most precious natural places.

The Federal Reserve Bank of Atlanta is part of the central bank of the United States. The Atlanta Fed territory covers the Sixth Federal Reserve District, which includes Alabama, Florida, and Georgia, and portions of Louisiana, Mississippi, and Tennessee.

HouseATL: ARC is a member of [HouseATL](#), a cross-sector group of civic leaders committed to building the political and community will for a comprehensive and coordinated housing affordability action plan for Atlanta. Established in 2018, formalized in 2021, and fiscally sponsored by the [Community Foundation for Greater Atlanta](#), HouseATL’s work is based on a set of strategic recommendations established by its cross-sector membership.

The **HouseATL** Pipeline Review Committee is a subset of the Funders’ Collective that meets regularly and reviews affordable housing development deals that have funding gaps to consider investments. The funders who participate consider making, and coordinating, investments from their own resources. It is staffed by Enterprise Community Partners. Qualified nonprofit developers of affordable for-sale homes will also be invited to apply for grant funding through the portal. The WORTH Initiative provides grant funding for predevelopment activities and “shovel-ready” for-sale housing developments. **Some of the funders who are currently participating include:** Atlanta Beltline Inc.; Atlanta Housing; Bank of America; JPMorgan Chase; Westside Future Fund; GA Department of Community Affairs; J. Bulow Campbell Foundation; Community Foundation for Greater Atlanta; Renasant Bank; Regions Bank; Wells Fargo; City of Atlanta; Truist; Low Income Investment Fund; St. Joseph’s Hospital System; LISC; Wells Fargo; Invest Atlanta; The Reinvestment Fund; Fifth Third Bank; ANDP Loan Fund; Mercy Community Capital; Capital Impact Partners; Annie E. Casey Foundation

Plans to Remove Barriers

The high and increasing cost of home ownership and rent perpetuate segregation in metro Atlanta. ARC's PRO Housing grant proposal is intended to utilize funding expansion, land banks, and land trusts to increase home ownership opportunities, to activate vacant and underutilized private and public land for housing and therefore impact the stability and wealth gap of the region over time. By assisting cities and counties with these tools and resources in conjunction with regional planning, the ARC will ensure housing is placed in areas of opportunity and in alignment with city and county goals of economic development, placing housing near transit and trails, and minimizing displacement. Areas of high opportunity struggle with land costs in an accelerated manor not seen to this extent in disadvantaged areas. Funding tools such as Housing Trust Funds and Tax Allocation Districts can incentivize affordable housing in areas of high opportunity, and Land Trusts can be utilized to keep homes permanently affordable. Communities must control the land to ensure it remains affordable, and the expansion of shared-equity is the primary vehicle for permanent affordability and community control. Land banks are natural partners to community land trusts and a mechanism to identify land pipelines for housing and to transfer or sell to community land trusts at a discounted rate.

To address housing need requires funding and resource networks. Currently, cities are developing these tools separately and in silos, and the grant will enable regional collaboration and resource sharing. By including research on recurring funding, property taxation and assessment of non-profit land, and education of lenders, and support for community land trusts, the ARC will help reduce costs and enable community-based, bottom-up expansion of CLTs and shared equity. ARC will lean into the successes of local cities and counties who allow innovative and higher density projects to fund pilot projects for both successes and community education.

Fair Housing

The plan will address many of the elements of fair housing laid out in the city and county consolidated plans in the region, including the following: Address the shortage of available units in areas of economic opportunity. Support development of for-sale housing units affordable to low- and moderate-income households, including homes located near employment, transportation, or other community resources. Increase affordable housing set-asides and provide financial incentives to supplement developer cost. Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing by establishing funding mechanisms that allow the city or county to act as a development partner, providing a pipeline of land through the expansion of land trusts, expanding community ownership and control through the community land trust model. These goals will deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas by increasing affordable home ownership in areas of opportunity. New and improved funding tools and education will provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing. Community-based education will help address negative perceptions of new housing.

Describe any anti-displacement measures included in your proposal.

The shared-equity project by The Guild and the People's Community Land Trust is a model developed by empowering the community to purchase an apartment building. This illustrates the type of innovation that can be developed and expanded with funding and collaboration.

Development of funding resources can help to stand up home and rental repair programs, which are needed regionally to keep vulnerable people in their homes and to ensure the long-term stability of shared-equity models. The community land trust model has proven success in Atlanta through the efforts of the Atlanta Land Trust and the People's Community Land Trust to provide residents with the power to participate in rental cooperative housing and shared equity models. This grant will further these efforts and expand policies and programming. Through the proposed programs in the grant proposal, we will give communities like Clarkston who are growing and developing trails and greenspace the means to counter any associated displacement. Overall, increasing the supply of housing through identifying pipelines of land across the region and ensuring abundant and flexible funding is available at the local level will increase the number of affordable units and provide more supply of affordable homes and rentals.

Each project will include engagement and outreach of minority, women, veterans, and business owners. Community engagement is a standard practice of ARC in its planning efforts and is part of the equitable programming of our established LCI and CDAP programs, which are a model for how ARC will execute grant funding for the PRO Housing grant, if awarded. Outreach will comply with and be consistent with federal nondiscrimination requirements.

How will you track?

The ARC will use established timelines and will expand the capabilities of the Metro Atlanta Housing Strategy to track progress. The ARC will set up the subgrant program and will track progress in the same manner as the established LCI and CDAP Programs. First, a project management team will be established for each project with bi-weekly meetings. Next, a stakeholder group will be formed with the intent to diversify the members of the committee and include representative from multiple groups including, but not limited to: affordable housing developers, residents, older citizens, college and youth, teachers, city or county staff, business owners and employees, artists and culture workers, health care workers, development authority or economic development members, planners, advocacy groups, and community-based organizations. The goals of the stakeholder committee are not only to provide input on the planning progress, but to help us reach out to those in their community – their circle of influence – to help us extend the reach of the engagement. Outreach to each community within the stakeholder group may vary: some may be interviews, others surveys, and some may be presentations. The third mechanism for follow-up is to set and adhere to timelines, which will be set during scope development. By setting milestones, the ARC will enable both understanding and agreement upon the steps and time for each stage of the project. By expanding collaboration, the ARC will impact efforts to reverse patterns of racial segregation while increasing affordable housing production. The Metro Atlanta Housing Strategy is an online tool that will use funding to track regional housing successes.

Comments included after public hearing

Budget: The grant objectives will be carried out through the following projects:

Atlanta Regional Commission: ARC will provide research and technical support through staff and contractual agreements, including 1) education and centralized resources for funding

programs (local, federal, and state) for affordable housing developers intended to ensure small and minority developers have access to funding that is not LIHTC, 2) research to create regional best practices for land assessments for non-profit and CLT property taxation, 3) Lender education for shared-equity models. ARC will also 4) support housing education across the region through local working groups, educational materials, and convenings. Lastly, ARC will 5) track and host regional best practices including model ordinances, housing successes through its Metro Atlanta Housing Strategy. The ARC's proposed budget includes the cost of project management including participant outreach and community education, and consultant costs to supplement staff capacity and expertise. The ARC will also provide marketing for the projects through its outreach channels and will use the research to inform both the proposed Regional Housing Plan and the Regional Climate Resilience work. **Funding estimate:**

City of Atlanta: Funding to support two projects: 1) the creation and regional expansion of a Tenant Portal. The portal will enable residents to find affordable housing after it is built. It will also serve as a comprehensive data gathering tool for affordable housing decisions, centralizing data on supply and demand and making funding, financing, development, and policy decisions easier. Project 2) ADU Design-Build procurement for pre-approved designs for 3-4 high quality modular ADU designs and predevelopment work for qualifying homeowners. **Funding estimate:**

DeKalb County: Grant funding estimate includes 1) Technical support to establish a Housing Trust Fund and set up funding mechanisms, establish policies and procedures to allocate funding to projects. 2) Grant assistance to develop procedures and capacity for the DeKalb Land Bank. 3) Technical support to identify a pipeline of land for the land bank, and to fund the predevelopment of identified pilot projects to showcase innovative housing. **Total funding estimate:**

Cherokee County: Funding support to 1) establish a Land Bank, 2) identify a land pipeline, and 3) technical support and predevelopment work pilot county projects using predevelopment funding. **Funding estimate:**

Gwinnett County: Technical support for 1) a feasibility study for a Housing Trust Fund, 2) identify land pipeline and suitability for housing, and 3) predevelopment costs for five identified parcels. **Funding estimate:**

City of Clarkston: 1) Technical support and research for established Housing Trust Fund, 2) research for additional funding resources, 3) establish policies and procedures to allocate funding to affordable housing, 3) funding to join the DeKalb Land Bank, and 3) funding to establish a Land Trust for anti-displacement and preservation as well as home ownership opportunities. **Funding estimate:**

City of Decatur/Decatur Land Trust: Funding for 1) research sources for Housing Trust Fund, 2) technical support to establish mechanisms for allocating HTF funds to affordable housing, and 3) pre-development of city owned land for housing to be held in the DLT. **Funding Estimate:**

City of Canton: Funding for technical support for 1) policies and procedures to join the Cherokee Land Bank (when established), 2) identify land pipeline, 3) identify funding resources for the Housing Trust Fund and 4) establish procedures to allocate funding. Also, 5) feasibility for a Land Trust, and 6) pre-development work including a civil site plan for two identified pilot projects. **Funding estimate:**

Gwinnett Housing Corporation: Funding for technical support to 1) establish a Land Trust, 2) pre-development work for eight identified parcels. **Funding estimate:**

Atlanta Land Trust: The Atlanta Land Trust has identified three primary activities that will benefit the region and beyond through PRO Housing grant funding:

- 1) Establish a Southeast Regional Community Land Trust Coalition. This priority includes funding for a) establishing this new entity, b) collaborative fundraising research, c) annual convening of member organizations years 2-6, d) education and material development for best practices, e) resource hub creation.
- 2) Create and expand the Atlanta Land Trust Stewardship Services model through a) establishing new entity with business model, legal procedures, scope of services, b) identification and implementation of staffing plan, c) education and outreach, d) marketing and funding identification.
- 3) Accelerate supply of permanently affordable homes through technical support and pre-development assistance for seven target properties in the process of being transferred from the City of Atlanta to the Atlanta Land Trust but not yet activated.

Total funding estimate:

People's Community Land Trust: The People's Community Land Trust has identified four primary activities to build programs to stabilize residents and expand the shared-equity model best practices to a wider geographical region:

- 1) Education to address a lack of knowledge of regional CDFIs about HUD permanent financing Programs including the 223(f) and 213 programs which can help to lower interest rates for project funding. The Guild has found through their experience launching projects at 379 Elm Street, 918 Dill Avenue, and 890 Dill Avenue in Atlanta that a gap in lender education exists between the non-profit developer and the CDFIs. Grant funding will create education to be directed to lenders to build a toolkit of programs including HUDs 223F and 213D to raise awareness of cooperative- and affordability-friendly financing programs and connect lenders, non-profits and HUD. **Funding estimates:**
- 2) Increase community education and large-scale engagement. The Guild launched a series of workshops and training curriculum in 2024 to prepare residents to join the community land trust / shared equity movement. The goal is to create a solidarity economy through a more fair, more sustainable economic system through shared ownership housing. Grant funds will scale up this education for a broader geographic reach. **Funding estimates:**
- 3) Developing an ongoing repair program for existing co-ownership models that will also expand workforce development and partnerships. Technical support will set up the structure, identify the staffing needs, establish policies and procedures, and identify funding sources for a repair program to ensure co-owned affordable properties are maintained over the long term. A workforce development program will be established through technical support and partner identification to create an opportunity to build careers in home development, including specialized education such as millwork and carpentry to combine job growth and new affordable housing creation. **Funding estimate:**

Metro Atlanta Land Bank: Facilitate the creation of active land banks in the region. 1) Assist local jurisdictions with policy and procedural infrastructure to create a land bank in conjunction with the Georgia Association of Land Bank Authorities, 2) technical support for associated legal assistance to both establish land banks and for target properties identified for transfer, 3) technical assistance for property pipeline development, 4) education for local governments, community, and stakeholders for how land is brought into the land bank and establishment of guidelines and support for the land banking processes. Technical support will inform guidance on moving properties into a land bank through different mechanisms such as foreclosure, tax sale, purchase, and donation. **Total funding estimate:**

Reduced Grant Funding

If the grant is not funded to the full amount, ARC would look first to reduce the costs of some of the larger projects such as the creation and support of a Regional Community Land Trust Coalition and expansion of the Metro Atlanta Land Bank activities. Thereafter, ARC would reduce the scope of activities proposed for the People's Community Land Trust. Lastly, the ARC would seek to reduce the amount of regional research proposed by the ARC and to then look at ways to reduce funding to the individual cities and counties for proposed activities.

Timeline:

Year 1:

- Form a working group to guide implementation of grant.
- Initiate scopes and procurement process for initiation of projects.
- Participating counties, cities, and non-profit partners sign MOU with ARC to formalize project commitments
- Develop working groups, scopes, supplementary agreements for ARC – lead research projects.
- Formation of community engagement plan, stakeholders for each project.
- Fund predevelopment work for existing land identified in projects.

Year 2:

- Projects kickoff, consultant selection and finalization
- Initiate land pipeline identification in counties, target projects to align with grant goals, equity objectives, and past planning
- Form subgroups with partners to conduct research and planning activities
- Target dates for establishment of Land Banks, Land Trusts, and Housing Trust Funds
- Convene subgroups and municipal leaders to explore pipelines for jurisdictions, help bridge funding
- Embed research and outreach into ARC Housing Plan and Regional Climate Resilience Study, update capabilities of Metro Atlanta Housing Strategy

Year 3-4:

- Confirm land pipeline results and target projects
- Work with stakeholders to ensure best practices are being observed and research is presented as potential policy recommendations
- Fund predevelopment work for identified target projects
- Increase community education and engagement

- Determine how to pace unit creation and installation to ensure housing production is increasing and to track housing and racial equity goals

Years 5-6:

- Monitor and assess regional implementation of programs
- Implement recommendations from consultant supported activities
- Monitor and track number of housing units in development, successes
- Final assessment and evaluation of projects
- Case studies produced
- Regional resources complete

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Great places don't happen by accident but require foundational change and critical improvements to address persistent challenges and growth in our region that is equitable, sustainable, and accessible for individuals across the socioeconomic spectrum. The ARC is a leader in planning and technical support and has decades of experience leveraging grant funding for projects and supporting local jurisdictions through leadership education and data resources. Since 2000, the **Livable Centers Initiative (LCI) Program** has invested over \$312 million in more than 130 communities throughout the Atlanta region, helping pay for planning studies through the RFP process in collaboration with local jurisdictions. The ARC board has allocated \$600 million through 2050 for transportation projects, and program goals include: encourage a diversity of housing, employment, commercial, shopping and recreation land uses at the transit station, local and regional center level accessible by people of all ages, abilities, and income levels, foster public-private partnerships and sustained community support through an outreach process that promotes the involvement of all stakeholders, including those historically underserved or underrepresented, and encourage mixed-income residential neighborhoods, employment, shopping, and recreation options. ARC's **Community Development Assistance Projects** are chosen based on staff capacity and how well the proposed project addresses ARC's priority issues and advances the guiding principles of equity and resiliency with an emphasis on at least one of the following: access to healthy food, creative placemaking, impacts of climate change, historic preservation, housing affordability, smart technology.

The Community Development Department of the ARC will continue to lead and manage the PRO Housing grant funds through stakeholder and partner program participation. The ARC has extensive experience managing Federal Grants. Each department of the ARC is funded primarily through Federal Funds except for one, which is funded by State dollars. In addition to the Community Development Department, the ARC houses Aging and Independence Services, Mobility Services, Natural Resources, Transportation Planning, Research and Analytics, Workforce Solutions, and Homeland Security. ARC has a full staff of financial and advisory coordinators and officers, and a department dedicated to administration of funding and budgeting. PRO Housing subgrants will take the form of ARC's LCI program which the Community Development Department has managed for over 24 years. The Community Development Department has a staff of 20 people. The Director of Community Development and a team of four people including the Planning Administrator, Principal Planner and Housing Specialist, Senior Planner and Housing Specialist, and Planner will oversee LLHAC and the associated Housing Action grants with assistance from Data & Analytics.

For further background on the ARC's planning initiatives: the ARC delivers four primary activities to local jurisdictions (city staff and elected officials) as well as housing authorities and community members in the region through a mix of targeted planning programs, Federal grant-funded initiatives, and leadership classes. These activities are planning, support, educating, and convening. **Planning** support includes the Livable Centers Initiative (LCI) program funded through transportation dollars, and which includes housing as a component in scoring for the program; the Community Development Assistance Program for which Housing Assessments are applied for by local jurisdictions; and Comprehensive Planning which includes housing recommendations based on ARC data analysis and community engagement; and the Comprehensive Economic Development Strategy (CEDS). **Support** for housing identifies local barriers primarily through the Metro Atlanta Housing Strategy developed in 2019, a data analysis tool to provide housing recommendations to each city or county based on analysis of their

specific housing markets and trends. **Educating** in the ARC's Community Development Department is not only focused on classes such as the Local Leadership Housing Action Committee (LLHAC), the Community Planning Academy (CPA), and the Regional Leadership Institute (RLI), but also through the arts, culture and community engagement. ARC **Convenes** organized leadership with visits to key communities who are doing progressive work in the areas of housing, mobility, equity, and climate through the Leadership Involvement Networking Knowledge (LINK) program, and the Atlanta Regional Housing Forum.

The ARC is well positioned to utilize grant funding for long-term, procedural changes in affordable housing policy as ARC provides planning and technical support to the entire Metro Atlanta region. This wide geographic spread and the ARC's experienced Community Development Department enables planning and technical assistance as well as expertise of ARC's Community Engagement group and Data Research & Analytics departments. In addition, ARC works with a growing network of advocacy organizations in Metro Atlanta to help convene and connect local governments to resources that will assist in implementing planning and policy goals. ARC's member jurisdictions have affordable housing best practices for which ARC is well positioned to share with local governments. ARC's partner organizations include affordable housing non-profit organizations, consultants, and housing authorities as well as core local jurisdictions.

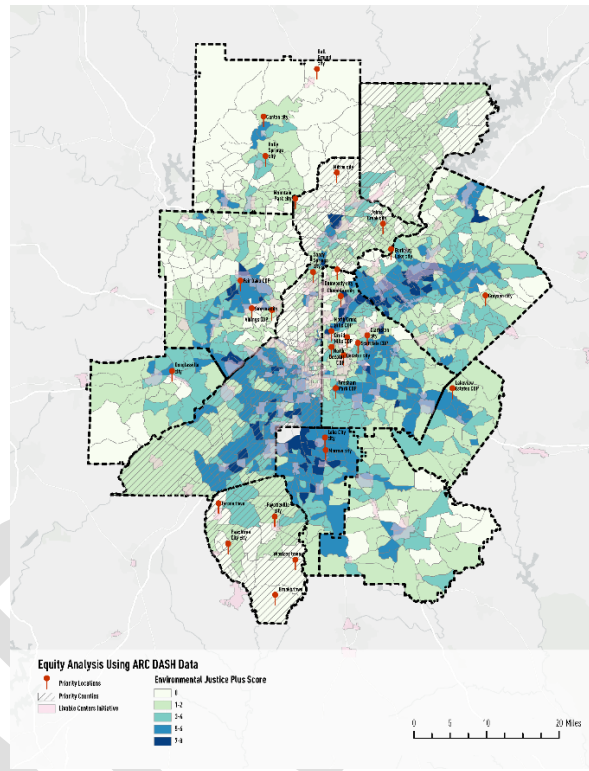
The Atlanta Regional Commission incorporates fair housing and justice into its work in the Community Development Department's planning work through CDAP and LCI programs. The LCI program applicants and projects must encourage a diversity of housing, employment, commercial, shopping and recreation land uses at the transit station, local and regional center level accessible by people of all ages, abilities, and income levels; and foster public-private partnerships and sustained community support through an outreach process that promotes the involvement of all stakeholders, including those historically underserved or underrepresented.

The CDAP program embeds equity into its Evaluation Criteria by assessing how well the project addresses social equity and/or community resiliency, how well the project includes community engagement, and the geographic diversity and support for the project. As part of ARC's ongoing efforts to create outcomes that benefit community members that have been disproportionately and negatively impacted by past planning outcomes, ARC prioritizes applications that demonstrate an active partnership between the local government and Community-Based Organizations (CBO).

The ARC Culture and Community Design program seeks to advance arts and culture as an essential part of inclusive and equitable planning in communities across metro Atlanta. One way we do this is through an immersive seven-month program where community organizations serving underrepresented populations collaborate with local officials and planners to design projects and planning initiatives focused on arts and culture. The program's goals are: supporting the capacity of these underrepresented communities to participate in and lead local and regional planning processes, with ARC as a collaborator and as a conduit to funding and execution; educating and training artists, culture bearers, planners, designers, and local government officials to collaborate on planning and community engagement projects; and establishing lessons learned on inclusive, equitable, and creative planning that we can share as best practices for future implementation.

At a regional level, the ARC monitors programs through its DASH tool. DASH is the Atlanta Regional Commission's monitoring dashboard which helps us track trends, understand where we are succeeding, and identify where we are falling short. The map above indicates areas of high to low environmental justice score combined with the grant's priority geographies and the ARC's Livable Centers Initiative areas.

Disadvantaged Geographies and Priority Geographies Overlap | ARC's DASH Tool¹⁹

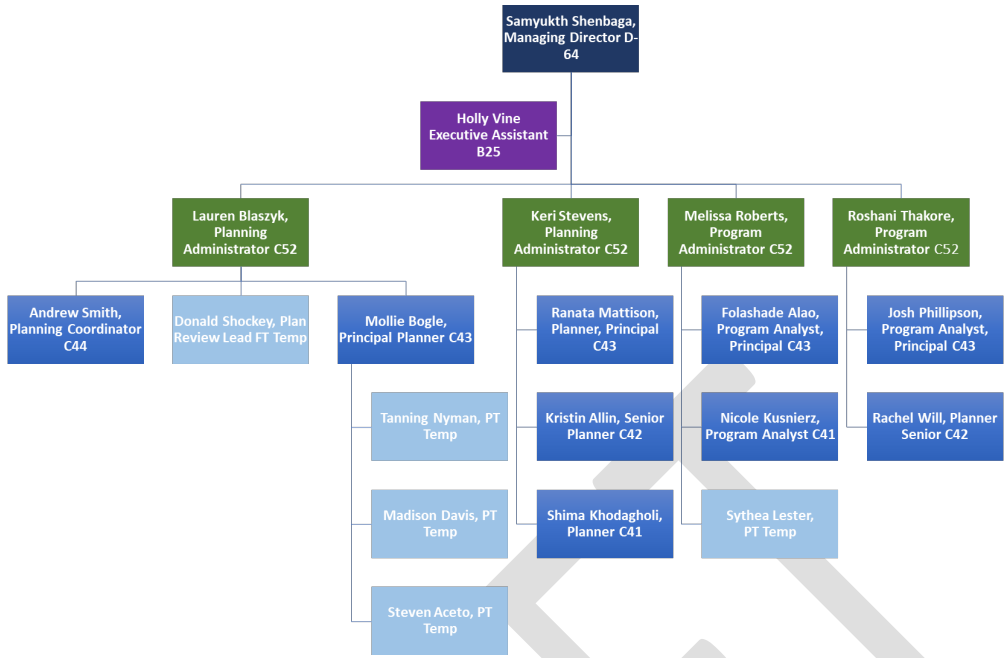


Concentration of combined racial minority, ethnic minority, and low-income households, from low (0) to high (8)

Grant Author: The grant application was written by the Senior Planner and Housing Specialist who will undertake the management of the PRO Housing grant along with the Community Development Department. Name: Kristin Allin, Position: ARC Senior Planner Department: Community Development Department, ARC.

The grant will be managed by the ARC's Community Development Department. The organizational chart is below:

¹⁹ [EQUITY ARC DASH \(atregional.github.io\)](https://atregional.github.io)



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Exhibit G Long-term Effect
Atlanta Regional Commission

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The Atlanta Regional Commission's proposal seeks to remove barriers in four areas that will result in long-term changes at the local level and regionally.

Funding is a barrier faced consistently by local jurisdictions seeking to accelerate affordable housing production and preservation. Through funding research, the grant will identify the best and highest use of funds for Housing Trust Funds and will provide a comprehensive assessment of other potential funding mechanisms in the identified jurisdictions including the formation or procedures for Tax Allocation Districts, bonding capabilities, in-lieu fees, and layering resources with federal and state funds. Because Georgia will require state legislation to allow certain funds to be allocated to a Housing Trust Fund, this research with all identified partners will have implications beyond metro-Atlanta and will model to the rest of the state. ARC will manage pass-through grants and will ensure funding research is moved forward with ARC's partners and stakeholders, and that the projects funded with new funding resources are tracked and community outreach is provided throughout the process.

Land is among the most necessary contribution to affordable housing as the land prices grow in the metro Atlanta region. Establishing and expanding Land Banks and identifying a pipeline of land including public land but also private, faith-based, school-owned, and other sources will enable targeted and long-term goals to be set for the region. As this barrier of lack of available land is removed by the creation and expansion of Land Banks, research and technical support will assist local jurisdictions in ways to move land into the Land Bank and to clear titles and remove past taxes. A clear connection between Land Banks and other stakeholders including Housing Authorities and Land Trusts is necessary to ensure Land Bank property is put to use for the highest community benefit and permanent affordability. ARC will manage pass-through grants to measure land pipeline identification and prioritization of the development of identified land for affordable housing that meets the goals of the grant.

The Community Land Trust model and shared equity model removes the barrier of expiring affordability and lack of community control over housing. By expanding the role of Community Land Trusts in the region, the grant will ensure that funding expended on affordable housing properties remain affordable over the long-term. The Land Trust model is flexible in that homes owned in the Community Land Trust not only retain community control, they can expand to tenant-owned rental property and create homeownership models that can serve as a bridge between renters and market-rate homeownership, thereby increasing wealth, enabling residents to afford homes in high-opportunity areas, and preserve affordable housing in areas in danger of displacement. ARC will ensure Land Trusts are part of the pipeline development process and that community engagement is accelerated and measured to empower community benefits through this model. Support for new local CLTs will be expanded by enabling grant funding to develop a stewardship model by the Atlanta Land Trust to assist new CLTs in the region. Not only will the grant fund new local CLTs, it will provide for an Atlanta-based Southeastern Regional Land Trust Coalition that will convene CLTs from the entire southeast and drive best practices and regional collaboration.

The fourth barrier of lack of regional resources will be removed through grant funding for added centralized resources and research for the region and to inform other cities and counties statewide. The grant will expand the City of Atlanta proposed Tenant Portal to link residents to new affordable housing opportunities, as well as collect data to inform policy. The ARC will expand the Metro Atlanta Housing Strategy to host model ordinances and central resources to

connect successes to the removal of these barriers. ARC will measure the number and effectiveness of the resources created and the research performed. ARC will also provide marketing, community engagement, and research on relevant regional issues to streamline policies and procedures regionally.

To further ensure long-term results during and past the grant timeline and the specified geographies, ARC will use best practices learned to provide technical assistance and engagement to other areas of the region through ARC's LCI and CDAP programs as well as ARC leadership programs. The timing of the grant award will align with ARC efforts to host a Regional Housing Summit and launch a proposed Regional Housing Plan, which will enable broad outreach and stakeholder participation to kick-off the projects.

What will you have achieved?

Identification of land and prioritization of new housing in areas of high opportunity in the grant include the City of Decatur as well as (cities and places) in DeKalb County, Gwinnett County, Cherokee County, Cobb County. There are also disadvantaged areas in each county, and lower income census tracts exist in the City of Clarkston, Canton. Planning through ARC will ensure housing is built in areas of high-opportunity that enable low-to-moderate income residents to live there. Within the goal of identifying land pipelines, planning and technical support will assist in defining what types and price points are needed to ensure that disadvantaged communities have input and control, that housing meets the need, and that projects do not isolate and concentrate low-income residents. ARC will couple grant funding with LCI and CDAP support, as well as engagement from the Community Development Department, to ensure planning and engagement are central to each project. The grant as proposed will expand the land bank and land trust models, related funding mechanisms, and regional resources.

Goals for the Grant:

1. Elevate and enable promising practices dedicated to identifying and removing barriers to affordable housing production and preservation, while preventing displacement, including through rewarding jurisdictions that have enacted laws and regulations that will lead to more affordable housing production and preservation;
2. Institutionalize state and local analysis and implementation of effective, equitable, and resilient approaches to affordable housing production and preservation;
3. Provide technical assistance to help communities better fulfill the Consolidated Plan's requirement of identifying barriers to affordable housing and implementing solutions to address these barriers;
4. Affirmatively further fair housing by addressing and removing barriers that perpetuate segregation, inhibit access to well-resourced areas of opportunity for protected class groups and vulnerable populations, and concentrate affordable housing in under-resourced areas; and
5. Facilitate collaboration and harness innovative approaches from jurisdictions, researchers, advocates, and stakeholders.

Identified Barriers:

- 1) Lack of adequate and flexible funding for land and housing,
- 2) Insufficient programs to leverage vacant or city-owned land for housing,

- 3) Need to increase permanent affordability models, and
- 4) Lack of resources, research, education and broad community representation in housing policy decisions.

Specific projects delivered by this grant proposal include:

- Establishment of a Housing Trust Fund and associated funding research in DeKalb County, the
- Capacity building for the DeKalb Land Bank and technical assistance for cities in DeKalb seeking to join the land bank.
- Technical assistance to expand the reach of the Metro Atlanta Land Bank by assisting cities in Fulton County to join the MALB.
- Technical assistance to establish the Cherokee County Land Bank.
- Funding research for existing Housing Trust Funds in Clarkston, Decatur, Canton to identify funding that may be allocated initially and those which require state legislation.
- Identifying land pipelines for new and existing Land Banks in Fulton County, DeKalb County, and Cherokee County.
- Technical assistance and feasibility studies to establish a Land Trust for the Gwinnett Housing Corporation the City of Canton, and the City of Clarkston.
- Technical assistance for pre-development work for identified land for affordable housing in Gwinnett County, Canton, Decatur as well as elevating successful projects for these counties and cities and relaying best practices and lessons learned regionally and statewide, with a focus on higher density projects, smaller footprints, and innovative housing types.
- Expanding the reach of the Atlanta Land Trust and People's Community Land Trust through expanding current pilot programs, developing new policies and procedures, and identifying a land pipeline and target projects.
- Technical assistance for pre-development work for parcels identified by the Atlanta Land Trust, the Decatur Land Trust, and the People's Community Land Trusts with a focus on higher density, smaller footprint, and innovative housing types.
- Expanding the capacity for the Atlanta Land Trust to increase stewardship for new CLTs and assist these startup entities.
- Creating the Southeast Regional Land Trust Coalition to broaden the reach of the shared equity model.
- Education to establish legal, lending, and property tax standards for Community Land Trusts and to education on state and federal funding sources.
- Establishment of Atlanta Tenant Portal, ARC regional resource hub.

Metrics: establish or expand six Land Banks, five Housing Trust Funds, five Community Land Trusts, identify pipelines of land in six counties and cities, and provide pre-development costs for approximately 25 pilot projects. Establish a new Tenant Portal, and centralized resources for regional model ordinances, funding research.

At the local level, expanding funding capabilities, Land Banks, Community Land Trusts, and regional research and resources will model these to other cities and counties in the region and to areas throughout the state of Georgia. At the regional level, these proposals will inform the potential need for collaboration and centralization of these models. Our goal is to ensure that the

city has opportunities for aging in place, mixed income areas, affordable housing and market rate housing, to increase home ownership and reduce the wealth gap, and to impact the patterns of segregation by leaning into land control and shared equity.

Beyond the immediate ARC region, the expansion of the CLT model to a Southeastern Regional Land Trust Coalition and expansion of research will allow an even broader, long-term reach to impact affordability to a broad geographic scale with long-term implications.

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