



2030 unified plan

Comprehensive Plan

Consolidated Plan

Comprehensive Transportation Plan

Technical Appendices

The following appendix presents the Gwinnett County Consolidated Plan for 2009 to 2013. Along with the Community Assessment and Technical Addendum (Unified Plan Appendix A), this document supplements the Unified Plan in providing greater detail on housing and community development issues, policies, priorities and strategies. Required by the United States Department of Housing and Urban Development, it provides specific quantitative and qualitative data needed to make fundamental decisions influencing the County's future growth and development. It also combines housing, homeless and community development planning efforts to accomplish the following overall goals for Gwinnett's low and moderate-income residents:

- 1.) Provide safe, sanitary, decent, affordable housing;
- 2.) Provide a suitable living environment;
- 3.) Expand economic opportunities.

Through the inclusion of the Consolidated Plan elements in the overall Unified Plan, housing and community development issues have been addressed in the context of the full range of land use, transportation and public investment issues that influence housing and the quality of life for county residents. This technical document much of the backup detail, including:

- 1.) Citizen Participation Plan (pg. 12)
- 2.) Anti-Displacement/Relocation Policy (pg. 18)
- 3.) Summary of Citizen Comments (pg. 22 and 33)
- 4.) Results of Consultations with Other Jurisdictions (pg. 29)
- 5.) Community Profile (pg. 34)
- 6.) Homeless (pg. 48)
- 7.) Housing - Affordable and Special Needs – (pg. 65)
- 8.) Community Development (pg. 105)

Readers wanting to focus on the housing and community issues typically addressed in the Consolidated Plan should refer to the following sections of the Unified Plan:

- Chapter C.5, Housing and Community Services of the *Unified Plan's Part I, Gwinnett: Trends and Challenges* discusses housing and community issues.
- Chapter C.4, Economic Well Being and Opportunity of the *Unified Plan's Part I, Gwinnett: Trends and Challenges* addresses economic development opportunities.
- Chapter D, The Central Themes of the *Unified Plan's Part II* identifies the overriding themes of the Unified Plan, including several that relate to housing and community development.
- Chapter A, Policies and Their Implementation of the *Unified Plan's Part III* provides specific strategies for implementing policies associated with each of the central themes. While housing policies are focused in A.4, Theme 4: Provide More Housing Choice, policies in all five themes relate to housing, community development, quality of life and other issues covered by Consolidated Plans.
- The *Community Assessment and Technical Addendum* (Appendix A) provides the detailed housing needs assessment and market analysis foundation for the Unified Plan housing and community development strategies and priorities.

GWINNETT COUNTY, GEORGIA **CONSOLIDATED PLAN - 2009-2013**



PREPARED FOR SUBMISSION TO:
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
ATLANTA OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT
FIVE POINTS PLAZA
40 MARIETTA STREET, 15th FLOOR
ATLANTA, GEORGIA 30303-2806

SUBMITTED BY:
THE GWINNETT COUNTY BOARD OF COMMISSIONERS
GWINNETT JUSTICE AND ADMINISTRATION CENTER
75 LANGLEY DRIVE
LAWRENCEVILLE, GEORGIA 30045-6900
SUBMISSION DATE: DECEMBER 15, 2008

TABLE OF CONTENTS	PAGE
VISION STATEMENT	4
INTRODUCTION	6
THE PLAN DEVELOPMENT AND CONSULTATION PROCESS	8
INTERGOVERNMENTAL/INTERAGENCY CONSULTATION	9
CONSOLIDATED PLAN PREPARATION/REVISIONS/AMENDMENTS	11
CITIZEN PARTICIPATION PLAN	12
ANTI-DISPLACEMENT/RELOCATION POLICY	18
CITIZEN SURVEY OF NEEDS	22
SUMMARY OF CITIZEN COMMENTS	22
COMMUNITY PROFILE	34
STRATEGIC PLAN	48
HOMELESS	48
HOMELESS GOAL AND PRIORITY OBJECTIVES	48
CONTINUUM OF CARE	57
ANALYSIS/STRATEGIES	49
HOMELESS NEEDS	57
INVESTMENT STRATEGIES	60
HOUSING	65
HOUSING GOALS AND PRIORITY OBJECTIVES	65
HOUSING NEEDS	66
CATEGORIES OF PERSONS WITH HOUSING NEEDS	66
OTHER HOUSING ISSUES	81
LEAD-BASED PAINT HAZARDS	81
FAIR HOUSING	82
HOUSING PRIORITY ANALYSIS AND STRATEGY DEVELOPMENT	91
AFFORDABLE HOUSING	91
SUBSTANDARD HOUSING	96
SPECIAL NEEDS HOUSING	100
COORDINATION OF HOUSING ACTIVITIES	103
COMMUNITY DEVELOPMENT [NON HOUSING COMMUNITY DEVELOPMENT PLAN]	105
COMMUNITY DEVELOPMENT GOALS AND PRIORITY OBJECTIVES	105
COMMUNITY DEVELOPMENT NEEDS	107
BARRIERS TO AFFORDABLE HOUSING	109
LEAD-BASED PAINT HAZARDS	109
ANTI-POVERTY STRATEGY	110
INSTITUTIONAL STRUCTURE	111
GOVERNMENTAL COORDINATION	113
PUBLIC HOUSING RESIDENT INITIATIVES/PUBLIC HOUSING NEEDS	114
PERFORMANCE MEASURES	114
APPENDICES	
APPENDIX 1 - HUD CERTIFICATIONS/EXECUTIVE ORDER 12372 REVIEW DOCUMENTATION	116
APPENDIX 2 - MONITORING PROCESS	126
APPENDIX 3 - NATIONAL OBJECTIVES [CDBG PROGRAM]	128
APPENDIX 4 - DISPLACEMENT STATEMENT	130
APPENDIX 5 - HUD CONSOLIDATED PLAN/ACTION PLAN REVIEW CHECKLIST	132
APPENDIX 6 – ACTION PLANS	150

TABLE OF CONTENTS – [CONTINUED]**PAGE****LIST OF TABLES**

TABLE 1-HOMELESS AND SPECIAL NEEDS POPULATION [HUD TABLE 1A]	53
TABLE 2-SUMMARY OF SPECIFIC HOMELESS OBJECTIVES	64
TABLE 3-PRIORITY HOUSING NEEDS SUMMARY TABLE [HUD TABLE 2A/2C]	77
TABLE 4-CURRENT HOUSING NEEDS - GWINNETT -ALL HOUSEHOLDS 2000 [HUD CHAS TABLE 1C]	73
TABLE 5-CURRENT HOUSING NEEDS - GWINNETT -WHITE NON-HISPANIC HOUSEHOLDS 2000 [HUD CHAS TABLE 1C]	74
TABLE 6-CURRENT HOUSING NEEDS - GWINNETT -BLACK NON-HISPANIC HOUSEHOLDS 2000 [HUD CHAS TABLE 1C]	75
TABLE 7-CURRENT HOUSING NEEDS - GWINNETT -HISPANIC HOUSEHOLDS 2000 [HUD CHAS TABLE 1C]	76
TABLE 8-SPECIAL NEEDS OF THE NON-HOMELESS [HUD TABLE 1B/1C]	77
TABLE 9-NUMBER OF HOUSING UNITS WITH EXPECTED LEAD-BASED PAINT	81
TABLE 10-PERCENTAGE OF HOUSING UNITS WITH EXPECTED LEAD-BASED PAINT	82
TABLE 11-NUMBER OF GWINNETT HOUSING UNITS WITH LEAD-BASED PAINT BY INCOME GROUPS/AGE OF HOUSING	82
TABLE 12-PUBLIC HOUSING NEEDS - BUFORD HOUSING AUTHORITY [HUD TABLE 4]	84
TABLE 13-PUBLIC HOUSING NEEDS - LAWRENCEVILLE HOUSING AUTHORITY [HUD TABLE 4]	85
TABLE 14-PUBLIC HOUSING NEEDS - NORCROSS HOUSING AUTHORITY [HUD TABLE 4]	96
TABLE 15-COMMUNITY DEVELOPMENT NEEDS - SUMMARY [HUD TABLE 2B]	107
TABLE 16 – SUMMARY OF SPECIFIC HOUSING/COMMUNITY DEVELOPMENT OBJECTIVES [HUD TABLE 2C]	108

LIST OF FIGURES

FIGURE 1 1990-2000 MINORITY POPULATION NET CHANGE	34
FIGURE 2 2000 MINORITY POPULATION PROPORTION OF TOTAL POPULATION	35
FIGURE 3 1990-2000 NET CHANGE IN MINORITY POPULATION PROPORTION OF TOTAL POPULATION	36
FIGURE 4 1990-2000 BLACK POPULATION NET CHANGE	37
FIGURE 5 2000 BLACK POPULATION PROPORTION OF TOTAL POPULATION	38
FIGURE 6 1990-2000 HISPANIC POPULATION NET CHANGE	39
FIGURE 7 2000 HISPANIC POPULATION PROPORTION OF TOTAL POPULATION	40
FIGURE 8 1990-2000 ASIAN/PACIFIC ISLANDER POPULATION NET CHANGE	41
FIGURE 9 2000 ASIAN POPULATION PROPORTION OF TOTAL POPULATION	42
FIGURE 10 1990-2000 NON-HISPANIC WHITE POPULATION NET CHANGE	43
FIGURE 11 2000 NON-HISPANIC WHITE POPULATION PROPORTION OF TOTAL POPULATION	44
FIGURE 12 2000 MEDIAN FAMILY INCOME	45
FIGURE 13 2000 MEDIAN HOUSEHOLD INCOME	46
FIGURE 14 CENSUS BLOCK GROUP	47

VISION STATEMENT

The Gwinnett County Board of Commissioners adopted the following Gwinnett County vision statement in 1995:

Gwinnett County will reflect a safe well-balanced, quality of life for people of all backgrounds and economic circumstances. The county should be a place where all people can feel good about where they live, have the opportunity for employment, have a sense of community spirit and are concerned for their future and the well being of their neighbors.

The Consolidated Plan process required by the U.S. Department of Housing and Urban Development (HUD) is designed to help the residents of Gwinnett County work as partners with the County Government to assess needs, to develop solutions to meet the needs, and ultimately to help the County fulfill the County's adopted vision. The resulting plan provides a framework to establish priorities for the County's investment in housing and community development over the next five years. It combines housing, homeless and community development planning efforts to accomplish the following overall goals for Gwinnett's low and moderate-income residents:

- 4.) Provide safe, sanitary, decent, affordable housing;
- 5.) Provide a suitable living environment;
- 6.) Expand economic opportunities.

This Unified Plan represents a break in the historic pattern of Consolidated Plans developed independent of many of the land use decisions and transportation investments that impact the lives of low- and moderate-income residents. By merging the Consolidated Plan into the Unified Plan, housing and community development policies and strategies are integrated into the many fundamental decisions influencing the County's future growth and development.

Gwinnett County has incorporated five (5) overall housing and community development goals, with a number of associated priority objectives for each goal, to be addressed during the Plan period:

- AH Increase access to affordable housing for low and moderate-income persons.
- HR Eliminate substandard housing for low and moderate-income individuals, families, and households.
- HML Increase housing options for homeless and near-homeless individuals and families.
- SNH Increase housing and supportive services for individuals and families with special needs.
- CD Acquire, construct or rehabilitate public facilities, provide equipment purchased through public service activities, and provide overall program administration and management, resulting in improvements in the social, economic and physical environment for low and moderate-income individuals.

The Unified Plan's Part I, Gwinnett: Trends and Challenges, profiles the county and highlights issues and concerns. Housing and community issues are discussed in Section C.5. The Community Assessment and Technical Addendum (Appendix A) provides the detailed housing needs assessment and market analysis foundation for the Unified Plan housing and community development strategies and priorities.

This technical appendix annotates the HUD checklist to refer readers to the relevant sections of the Unified Plan that answer traditional Consolidated Plan questions. It also provides much of the backup detail, including:

- Citizen Participation Plan
- Anti-Displacement/Relocation Policy
- Summary of Citizen Comments
- Results of Consultations with Other Jurisdictions
- Selected Additional Maps
- Institutional Structure
- Governmental Coordination
- Public Housing Resident Initiatives/Public Housing Needs

The checklist used by HUD to review the Consolidated Plan is included in Appendix 5 of this document. The checklist contains specific pages of the Unified Plan which address individual Consolidated Plan requirements.

INTRODUCTION

A. What is the Consolidated Plan?

The United States Department of Housing and Urban Development (HUD) initiated a new planning process, beginning in 1995, which consolidated the plans, applications, and program descriptions for the grants which it makes directly to Entitlement Cities and Urban Counties [over 200,000 population]. HUD approved incorporation of the Gwinnett County Consolidated Plan into this Unified Plan as a pilot demonstration project to encourage closer coordination with other County planning efforts and to reduce duplication of effort. This Consolidated Plan produced by Gwinnett County, Georgia, covers Program Years 2009-2013.

As stated in the regulations for the Consolidated Plan, codified in the Code of Federal Regulations at 24 CFR 91,

"The overall goal of the community planning and development programs covered by this part (24 CFR 91.1, Subpart A) is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons". The primary means to this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and operation of affordable housing.

- (i) Decent housing includes assisting homeless persons to obtain appropriate housing and assisting persons at risk of becoming homeless; retention of the affordable housing stock; and increasing the availability of permanent housing in standard condition and affordable cost to low-income and moderate-income families, particularly to members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability. Decent housing also includes increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs, including persons with HIV/AIDS and their families, to live with dignity and independence; and providing housing affordable to low-income persons accessible to job opportunities.
- (ii) A suitable living environment includes improving the safety and livability of neighborhoods; increasing access to quality public and private facilities and services; reducing the isolation of income groups within a community or geographical area through the spatial deconcentration of housing opportunities for persons of lower income and the revitalization of deteriorating or deteriorated neighborhoods; restoring and preserving properties of special historic, architectural, or aesthetic value; and conservation of energy resources.
- (iii) Expanded economic opportunities includes job creation and retention; establishment, stabilization and expansion of small businesses (including micro businesses); the provision of public services concerned with employment; the provision of jobs involved in carrying out activities under programs covered by this plan to low-income persons living in areas affected by those programs and activities; availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; access to capital and credit for development activities that promote the long-term economic and social viability of the community; and empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally assisted and public housing."

In this Unified Plan, Gwinnett County addresses the HUD "decent housing" and "suitable living environment" goals in Part I Section C5, Housing and Community Services. The Plan also addresses economic development opportunities in Part I: Section C4, Economic Well Being and Opportunity. The private sector, through the Gwinnett County Chamber of Commerce, is taking the lead to implement the economic development strategy to foster "expanded economic opportunity."

In conformance with 24 CFR 91.1, (b), the Gwinnett County Unified Plan serves the following functions:

- (1) A planning document for Gwinnett County which builds on a participatory process at the lowest levels;
- (2) An application for federal funds under HUD's formula grant programs for each respective year within the five-year Plan period;
- (3) A strategy to be followed in carrying out HUD programs; and
- (4) A document that provides a basis for assessing performance.

The Gwinnett Unified Plan [hereinafter referred to throughout this document as the "Unified Plan," the "UNIFIED PLAN," or the "Plan"] will be the blueprint used by Gwinnett County to pursue these goals, according to the needs and strategies developed by Gwinnett County in consultation with its participating cities, non-profit organizations, adjacent governments, and most importantly, in consultation with its citizens.

Gwinnett County recognizes and acknowledges that the Unified Plan is the "yardstick" by which its community development and housing performance will be evaluated by HUD and by the citizens of Gwinnett County. Every effort is being made to insure that the Unified Plan reflects the most current locally identified needs, and that it contains suitable and reasonable strategies which mirror the adopted public policies of Gwinnett County.

B. HUD Grant Programs Affected by the Unified Plan

Gwinnett County receives the following Entitlement grants directly from HUD:

- (1) The Community Development Block Grant (CDBG) Program;
- (2) The Home Investment Partnership Act (HOME) Program;
- (3) The American Dream Downpayment Initiative; and
- (4) The Emergency Shelter Grants (ESG) Program.

Gwinnett County and nonprofit organizations within Gwinnett County also receive HUD funds indirectly from other local governments:

AID Gwinnett, Inc., a nonprofit organization based in Lawrenceville, receives funds from the Housing Opportunities for Persons With AIDS [HOPWA] Program. AID Gwinnett has been assisting persons who have AIDS or the HIV Virus to help prevent them from becoming homeless and to provide supportive services to these individuals. For the 1992 HOP WA grant, Gwinnett County applied through Fulton County for these funds and offered them to AID Gwinnett. Beginning with 1993 funds, the City of Atlanta is the grant recipient, and AID Gwinnett now receives its HOP WA funds directly from the City of Atlanta.

The City of Atlanta's Consolidated Plan includes all the HOPWA Program related needs, objectives, strategies, resources, and projects located in 20 counties in the metropolitan Atlanta. Public Hearings are held by the City of Atlanta to receive citizen reactions/comments on its Consolidated Plan.

THE PLAN DEVELOPMENT AND CONSULTATION PROCESS

Gwinnett County prepared its Unified Plan utilizing data (1) collected through a local public participation process and from the Consultation Process with adjacent local governments; (2) data from the Gwinnett County Unified Plan Community Assessment and its periodic updates; (3) data from Census 2000 and extrapolated information provided by HUD.

The needs assessment process for the Plan began in March, 2006 and will continue annually throughout the Plan period until the Plan period ends in 2013.

During 2007 and 2008, interviews were held with organizations on the Gwinnett County Community Development Program contact list. Needs assessment information was also collected at a series of public information meetings/hearings, listed immediately below. The meetings/hearings were advertised on the Gwinnett County Website, through notices distributed throughout the County, and through a Public Notice which was published in the *Gwinnett Daily Post* on October 17, 2006, which included a public comment period of October 16, 2006 – November 20, 2006. The appendices contain more detail about the comments received.

NEEDS ASSESSMENT PUBLIC INFORMATION MEETINGS/HEARINGS

Dates	Locations	Times
November 1, 2006	Lenora Park Activity Building – Snellville	4:00-7:00 P.M.
November 1, 2006	Crossroads Center, Suwanee	4:00-7:00 P.M.
November 2, 2006	Activity Building, Mountain Park Aquatic Center	4:00-7:00 P.M.
November 2, 2006	Dacula City Hall	4:00-7:00 P.M.

Under the Consolidated Plan regulations, citizen comments on a proposed Consolidated Plan are received for not less than thirty (30) calendar days prior to submission of the Consolidated Plan or Action Plan to HUD. Thirty (30) day public comment periods are used for all years during the Plan period, for each year’s Action Plan period. These annual needs assessment processes are described in the individual Annual Action Plans prepared by Gwinnett County and submitted to HUD.

Public comments were solicited by Gwinnett County on the **draft components of the Unified Plan 2030** at the following Public Information Meetings/Hearings:

Dates	Locations	Times
August 11, 2008	George Pierce Park Community Center– Suwanee	4:00-7:00 P.M.
August 11, 2008	Pinckneyville Community Center – Norcross	4:00-7:00 P.M.
August 14, 2008	Activity Building, Mountain Park Aquatic Center	4:00-7:00 P.M.
August 14, 2008	Bogan Park Community Center, Buford	4:00-7:00 P.M.

In addition to these public meetings, a formal public hearing was held on October 21, 2008 in the Gwinnett Justice and Administration Center, Conference Center, Room C. The public hearing was held during a 30-day public comment process: October 1, 2008 – October 31, 2008.

The proposed plan documents were available during the 30-day public comment period on the Gwinnett County Website [www.gwinnettcounty.com], and printed copies were available for review at the Gwinnett Justice and Administration Center and at the Gwinnett County Community Development Program. Copies were also distributed for comment to the fifteen (15) participating cities in Gwinnett County and to the nearly 100 public and non-profit organizations on the Gwinnett County Community Development Program Contact List.

Public comments received during the Public Comment periods for Needs Assessment and for proposed plans were provided to the Gwinnett County Board of Commissioners before their consideration of the plans on November 25, 2008.

A. Intergovernmental/Interagency Consultation [24 CFR 91.100]

The Consolidated Plan regulations stress the need to consult not only with the citizens themselves -- but also to consult with agencies which serve these citizens. Gwinnett County used data collected from such agencies as basic data elements for the Consolidated Plan. Also, upon completion of this Consolidated Plan, the draft document was disseminated among the agencies which serve low-income and very low-income persons. A summary of comments received in the review process for the Needs Assessment and for the Proposed Consolidated Plan 2009-2013 is contained, herein.

The plan development/review/consultation comment process involved the following entities:

The nonprofit agencies in Gwinnett County whose activities are primarily housing and homeless problems for low income persons include:

The IMPACT! Group - which serves as the Gwinnett County Community Housing Development Organization (CHDO) under the HOME Program.
Gwinnett County Habitat for Humanity
Salvation Army, Gwinnett County
Cooperative Ministries in Duluth, Lawrenceville, Lilburn, Norcross, and Southeast Gwinnett Rainbow Village
Distinguished Women With a Purpose
Asian-American Resource Center

Public and private health and social service agencies involved in Consolidated Plan development/review consultation included:

Gwinnett County Department of Family and Children Services
Gwinnett County Health and Human Services Coalition
Gwinnett County Department of Community Services -
Human Services Partnership for Community Action
Ninth District Economic Opportunity Authority - Head
Start Program Sheltering Arms Child Development -
Child Care Centers
GRN Community Service Board - Mental Health, Mental Retardation, Substance Abuse
Gwinnett County Health Department
Housing Authority of the City of Buford
Housing Authority of the City of Lawrenceville
Housing Authority of the City of Norcross
Barrier Free Gwinnett - Architectural Barriers Removal/Services to Persons with Disabilities
Gwinnett County Public Schools
Partnership Against Domestic Violence
Gwinnett Children's Shelter
Gwinnett County United Way
Boys and Girls Clubs of Metropolitan Atlanta
Gwinnett Council for Seniors - Senior Citizens
NAACP, Gwinnett Chapter
Gwinnett Sexual Assault Center, Inc.
Creative Enterprises, Inc.
Latin American Association
Gwinnett Human Relations Council - Fair Housing and Civil
Rights Issues Gwinnett Association for Retarded Citizens
[d/b/a Hi Hope Center] AID Gwinnett - Housing/Services
for Persons with AIDS/HIV
Creative Enterprises - Job Training/Employment for Persons
with Disabilities Atlanta Legal Aid
The Foundation for Northeast Georgia

Travelers Aid of Metropolitan Atlanta
disAbility Link

Other citizens/agencies/organizations are invited to participate in the Consolidated Plan process throughout the five-year period. The involvement of these additional individuals and organizations will further enhance the ability of Gwinnett County to refine its Unified Plan to reflect the needs of the community as a whole.

Governmental Consultation

General Purpose Local Government Consultation

The following adjacent general purpose local governments were consulted during the Unified Plan development process:

Barrow County, DeKalb County, Forsyth County, Fulton County, Hall County, Jackson County, and Walton County

The cities located, wholly or partially, in Gwinnett County consulted in the Unified Plan development process include:

Auburn	Berkeley Lake	Braselton	Buford	Dacula
Duluth	Grayson	Lawrenceville	Lilburn	Loganville
Norcross	Rest Haven	Snellville	Sugar Hill	Suwanee

Consultation - Lead Based Paint Hazards (LBP)

Of particular significance is the need to develop a plan which addresses problems in our society which inhibit the abilities of citizens to be able to achieve the goals of providing decent and safe housing. One of the major threats to pregnant women, young children (age six and younger), and women of child-bearing age -- particularly low-income children -- is the danger present in paint which contains toxic lead compounds. Gwinnett County gathered information in the Unified Plan development process on this issue and has included information later in this document addressing this issue in some detail. This data indicates that Gwinnett County has relatively few housing units with the potential for incidence of LBP, i.e. constructed before 1978 (50,007) which represents twenty-four percent (24%) of the total housing units in Gwinnett County at the time of Census 2000. This low level is reflective of the relative newness of the housing stock in Gwinnett County. More than 80% of the housing units in Gwinnett County were built after 1980. Neither the Gwinnett County Health Department nor the Gwinnett County Department of Family and Children Services indicated that they have current caseloads of individuals with elevated levels of lead based paint in their blood.

HOPWA Consultation

The Consolidated Plan regulations state (see 24 CRR 91.100) that the largest city in each metropolitan area -- the City of Atlanta -- is eligible to receive a HOP WA formula allocation, and must consult broadly to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the metropolitan area. Gwinnett County will continue to participate with the City of Atlanta and the other general-purpose local governments in Metro Atlanta to carry out this process. The HOP WA needs for the entire twenty county area are presented in the City of Atlanta's Consolidated Plan component for HOP WA.

Public Housing

Public housing needs, as obtained directly from cooperating local Housing authorities and from HUD are contained in this Unified Plan. Gwinnett County coordinates with its Public Housing Authorities (Gwinnett County, Buford, Lawrenceville, Norcross, and Sugar Hill), thereby seeking to insure that the authorities and their residents (excluding the authorities for Gwinnett County and Sugar Hill which own no Public Housing) are aware of the governmental and private provided services for which these entities and individuals may qualify. Moreover, the consultation process is also geared toward the coordination of other programs/projects funded by the local governments and/or the housing authorities to maximize programmatic effectiveness.

Public Housing Authorities (PHA) in Gwinnett County which own/operate public housing (Buford, Lawrenceville, and Norcross) now prepare their own PHA Plans as required by HUD. The Gwinnett County Community Development Program reviews the PHA plans for consistency with the Gwinnett County Unified Plan.

Consultation Timetable and Public Access To Proposed Unified Plan

The proposed Unified Plan 2009-2013 was made available to all the listed government agencies, nonprofit organizations and all other interested parties or citizens for public review and comment for thirty (30) calendar days (October 1, 2008 - October 31, 2008). The public notice of availability of the original proposed Consolidated Plan was published in the Gwinnett Daily Post on October 1, 2008 and appeared on the Gwinnett County Website [www.gwinnettcountry.com] on the same date.

The Gwinnett County Community Development Program (CDP) is staffed by a Program Management consulting firm, W., Frank Newton, Inc. (WFN), which works under the administrative supervision of the Gwinnett County Department of Financial Services. Bay Area Economics and WFN prepared the Needs Assessment and Consolidated Plan development processes for the County.

B. Consolidated Plan Preparation

Process/Revisions/Amendments Consolidated Plan

Process

The Consolidated Plan Regulations (24 CFR Part 91) and additional guidance from HUD stipulate the required minimum contents of the Consolidated Plan prepared by an Entitlement Grantee. However, each city or county which prepares a Plan must structure the format and contents of the plan based on their respective problems, needs, goals, objectives, etc.

The period covered by a Consolidated Plan is selected by each Grantee. Following suggested guidelines prepared by HUD, Entitlement grantees select three (3) or five (5) year plans. Gwinnett has prepared a five (5) year Plan (2009-2013) with five separate Annual Action Plans, per HUD requirements.

Consolidated Plan Amendments

During the course of implementing projects and activities using HUD Entitlement Grant funds, it may be necessary to amend the Consolidated Plan or to amend individual Action Plans which provide the grant funding for individual years. Gwinnett County follows the same advertisement/public hearing/public review/comment process for revisions or amendments that it uses for the preparation of a new Consolidated Plan. The process involves a 30-day public review and comment period, including at least one Public Hearing. Comments received on the proposed amendments are provided to the Gwinnett County Board of Commissioners prior to their consideration of proposed amendments. A summary of public comments received are included in the amendment documentation submitted to HUD.

CITIZEN PARTICIPATION PLAN

NOVEMBER 25, 2008 [ADOPTION DATE]

The Consolidated Plan Regulations require grantees to adopt a citizen participation plan. The Plan contains the required elements listed in the Consolidated Plan regulations at 24 CFR 91.105.

1 & 2. ENCOURAGEMENT OF CITIZEN PARTICIPATION AND INFORMATION TO BE PROVIDED

Gwinnett County has taken specific actions to provide for, and encourage, increased participation in its housing and community development programs, particularly by persons of low and moderate-income. Some of the actions include:

- Identify geographic areas in the County with concentrations of low- and moderate-income persons and concentrations of minorities;
- Prepare Project Proposal Application forms, and the Consolidated Plan in a manner so as to afford low and moderate-income persons, and other affected citizens, the opportunity to examine its contents;
- Inform the citizens through such methods newspaper articles and advertisements, local contact persons, public hearings, the Gwinnett County Website [www.gwinnettcounty.com], cable television announcements, etc., of the amount of HUD grant funds available for proposed activities, the potential activities to be funded, the availability of applications for funding, the actual projects recommended for funding, and the availability of the proposed Consolidated Plan, proposed Action Plan, proposed plan amendments, or annual progress reports for public review and comment;
- Review of all citizen comments and incorporation of such comments in the Consolidated Plan, as applicable;
- Analyze the impact of Consolidated Plan program activities on neighborhood residents, particularly very low income, low income, and moderate-income residents;
- Conduct Needs Assessments, on-site visits, and site analysis for proposed projects, before inclusion in the Proposed Consolidated Plan;
- Meet with individual citizens, neighborhood organizations, and other groups to inform them about the Consolidated Plan, project eligibility, the program planning process, project selection and funding, and the project implementation process.

Gwinnett County will continue to provide a dialogue for open communication with its citizens, particularly very low income, low income and moderate-income persons, concerning its HUD funded programs, and the ways that such persons might benefit from these funding programs. Utilizing various communications techniques, including but not limited to, meetings with church, neighborhood and civic associations, public hearings, newspaper articles and advertisements, radio and television announcements and feature stories, and individual personal contacts, Gwinnett County will strive to continuously increase citizen participation in its housing and community development programs.

- Gwinnett County provides timely and accurate information about the housing and community development program to all participating municipalities in the Gwinnett Urban County program. Numerous meetings are held and written documents transmitted to all the cities (participating and non-participating). Many of the heaviest concentrations of low and moderate-income persons reside within the boundaries of these municipalities -- particularly Buford, Lawrenceville, and Norcross. Active participation by these cities in the Gwinnett County housing and community development programs helps to insure that all low and moderate-income city residents can participate fully in these HUD-assisted activities.

All cities within the County have joined, including the split cities of Loganville and Auburn (beginning in 1998). Every year, all split cities (including any non-member cities) are eligible to join.

3. ACCESS TO RECORDS, LOCAL MEETINGS AND INFORMATION

Gwinnett County will continue to provide reasonable and timely access to all public hearings and local public meetings. All information and records relating to Gwinnett County housing and community development program activities are made available to the public for review and comment, according to the requirements of Federal, State and local laws and regulations.

Each municipality participating in the Gwinnett County Urban County program provides a forum for citizen input on proposed projects during one or more of its Council meetings. Projects are discussed and approved by the respective participating cities prior to submission to the Gwinnett County Community Development Program.

Notices of public hearings are widely publicized throughout the County. Before the hearings are held, at least one advertisement is placed in the local newspaper of general circulation. The advertisements are "display ads" or "legal ads" which appear in the sections of the newspaper most likely to be read by citizens, particularly low and moderate-income citizens. In an effort to make newspaper advertisements as "reader-friendly" as possible, the advertisement language may present essential information, in summary fashion. Citizens are encouraged to obtain copies of documents referenced in the advertisements for additional information.

Before the Gwinnett County Board of Commissioners approves a Consolidated Plan, Action Plan, or amendment, a summary of the proposed Consolidated Plan, Action Plan, or amendment is published in the official "County Legal Organ," a local newspaper of general circulation, and copies of the proposed plan or amendment are made available to the public by U.S. Mail, email, and/or by posting the information on the Gwinnett County Website [www.gwinnettcountry.com]. The summary contains the contents and purpose of the Consolidated Plan or amendment and lists locations where copies of the entire plan or amendment can be examined (24 CFR 91.1 05[b] [2]). The Consolidated Plan, Action Plan, or amendment documents include the amount of financial assistance the County expects to receive from HUD, the range of activities which the County expects to undertake -- including the amount which will benefit persons of very low and low income and the plans to minimize displacement of persons and to assist any persons displaced (24 CFR 91.1 05[b] [1]).

Copies of public hearing notices, descriptive information concerning the HUD-assisted housing and community development programs, proposed Consolidated Plan, proposed Action Plan, [and any proposed Consolidated Plan or Action Plan amendments] and Consolidated Annual Performance and Evaluation Reports are placed in accessible locations in Gwinnett County to permit public review and comment. Local housing and community development contact persons/organizations are informed of the availability of these documents if they wish to disseminate them to neighborhood groups and to low and moderate-income persons. Documentation is maintained in the Department of Financial Services and the Community Development Program Office, indicating the opportunities provided to citizens to insure that all meetings, records, and documents are readily accessible to the citizens of Gwinnett County.

Gwinnett County will notify citizens, all participating municipalities, nonprofit organizations, county departments, and other interested parties of the availability of the Consolidated Plan, and/or Action Plan as adopted, any amendments, and its performance report, as these documents are developed, to provide a reasonable opportunity to examine their contents (24 CFR 91.105 [b] [2]).

Public Comment Periods: Consolidated Plan or Amendments

As required by the HUD regulations, Gwinnett County will provide a period, not less than 30 calendar days, from the date of public notice, to receive comments on a proposed Consolidated Plan, proposed Action Plan or proposed Consolidated Plan or proposed Action Plan substantive amendments (24 CFR 91.105 [c] [2]).

Reports and Other Documents

Not less than 15 calendar days will be provided to receive public comments on annual reports, Environmental Notice of Release of Funds (24 CFR 58.45), and other documents, which are to be submitted to HUD (24 CFR 91.105 [d]).

Gwinnett County will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the County's use of HUD housing and community development assistance [including all assistance provided to Gwinnett County under 24 CFR 91 during the preceding five years. Interested parties should contact the Gwinnett County Department of Financial Services or the Gwinnett County Community Development Program for such information. Reasonable requests may be satisfied at the time of the request. If more detailed information is requested which requires some form of compilation of data which does not exist in HUD-prescribed format(s), such requests will be handled in accordance with the Open Records Act (OCGA, 50-18-70) and Gwinnett County procedures for compliance, therein.

4. PROVIDE TECHNICAL ASSISTANCE TO CITIZENS

The Gwinnett County Community Development Program provides technical assistance to Gwinnett County citizens, particularly to persons of very low income, and low income, who request such assistance in developing project proposals or who request other information (compliance requirements, program performance, funding information, etc.) covered by the Consolidated Plan. Project application forms are available for anyone and are distributed, at no cost, to requestors. A one-on-one meeting will be arranged for individuals and/or groups -- particularly persons of very low income and low income or groups representing such persons, when requested or necessary, to explain the project eligibility, application, and approval process and the implementation requirements. The Gwinnett County Community Development Program staff and/or the Department of Financial Services Grants staff will attend neighborhood meetings, and will meet with nonprofit organizations or individuals to provide other specific technical assistance related to housing and community development programs, as requested and as needed.

5. PUBLIC HEARINGS

Gwinnett County will hold public hearings to obtain citizens comments and concerns, and to respond to proposals and questions. All activities proposed for funding with HUD homeless, housing, and community development funds, through the Gwinnett County Consolidated Plan and Annual Action Plan will be carefully reviewed and appropriate recommendations will be made to the Board of Commissioners by the Department of Financial Services. Notice of public hearings will be published in the local newspaper of general circulation at least once prior to the hearing(s). The hearing(s) will be held at location(s) and time(s) convenient for potential or actual program beneficiaries. The public hearing(s) will be held at a site(s) with accessibility and parking facilities which will accommodate persons with disabilities. All public hearings will be properly documented, and will include as appropriate, lists of attendees, public comments, available funds, proposed objectives and projects. At least one public hearing during each year shall present a report on performance of the use of Entitlement HUD Grants. Written minutes of the public hearing(s) will be maintained on file in the Community Development Program Office and will be available to the public for review during normal business hours, or at other times by appointment.

Annually, Gwinnett County will conduct a minimum of two (2) sets of public hearings for the Community Development Program, held at different stages of the program year, as described, herein. Public hearings are held primarily at the Gwinnett Justice and Administration Center, and may also be held, at other locations, to ensure the locations are accessible to residents of the County.

1. Needs Assessment/Applications Received Public Hearing(s)

At the Needs Assessment Public Hearing(s), citizens, agencies, and other interested parties are invited to share with Gwinnett County their views on housing, homeless, and community development needs. This Public Hearing is held following an open application cycle, which is advertised as described, herein. The purpose of the Public Hearing is to receive public input on needs, and to receive comments on all projects submitted to Gwinnett County which are requesting funding from Gwinnett County's HUD grant funds to address housing, homeless, and community development needs.

2. Proposed Consolidated Plan or Proposed Action Plan or Proposed Amended Consolidated Plan or Proposed Amended Action Plan Public Hearing(s)

A Proposed Consolidated Plan or amendments; a Proposed Action Plan or amendments are presented to the public in later and separate public hearing(s), including all the housing, homeless and non-housing community development needs, goals, proposed priority objectives, strategies, potential resources available to address these needs, and proposed projects.

Utilizing citizen input from the second set of public hearing(s), Gwinnett County will develop the final Consolidated Plan or Action Plan or amended Consolidated Plan or amended Action Plan for consideration by the Gwinnett County Board of Commissioners. Citizen comments received are presented to the Board of Commissioners prior to their taking action on the documents. A summary of citizen comments is included in the Consolidated Plan or Action Plans submitted to HUD.

Provisions for Non-English Speaking Residents

Gwinnett County has made arrangements with multi-lingual county personnel who act as interpreters, when required, at public hearings. Local contact persons are asked to identify non-English speaking residents, prior to the public hearings, so that adequate arrangements can be made to accommodate such citizens.

Non-English speaking persons or their community representatives should contact the Community Development Program at least five (5) working days prior to the public hearing date to allow time to make arrangements to have a translator at the Public Hearing(s) in question.

Provisions for Persons With Hearing Impairments

Persons who are deaf or have hearing impairments who wish to participate in Public Hearings and who need to have a person to "sign" for them at the Public Hearing should contact the Community Development Program via **[TDD/TTY 770- 822-5195]**, or via the Georgia Relay Center **[TDD/TTY 7-1-1 or 1-800-255-0056]** at least five (5) working days prior to the public hearing date. The Georgia Relay Center is operated, free to users, by AT & T.

Provisions for Persons With Speech Disabilities

Persons who have a speech disability can utilize a service called Speech-to-Speech (STS) Relay through the Georgia Relay Service, operated free of cost to users by AT&T. Speech-to-Speech service enables a speech-disabled person to use the Georgia Relay Service with his/her own voice synthesizer, rather than using a TDD/TTY device. Callers using the STS service can call either **[7-1-1 or 1-888-202-4082]** to use the service.

Persons with who are deaf, hard of hearing or speech disabled may also use a relay service over the internet at www.hamiltonrelay.com to connect to a specially trained Communications Assistant. This service may also be accessed by calling hipvrs.com from a D-Link videophone to access video relay service, where a certified American Sign Language (ASL) interpreter will relay your signed conversation to the hearing party.

This statement shall be published in advertisements announcing public hearings.

6. COMMENTS AND COMPLAINTS

Gwinnett County will consider any comments or views of citizens, agencies, or other interested parties received in writing, or orally at public hearings, in preparing the final Consolidated Plan, final Action Plan, amendments to the plans, or other report or documents. A summary of these comments or views not accepted and the reasons for non-acceptance will be attached to the final Consolidated Plan, final Action Plan, amendment to the plans, or reports.

Non-Discrimination Policy/Complaint Review Process

It is the policy of Gwinnett County to provide equal opportunity for services without regard to race, color, sex, age, national origin, religion, political affiliation, presence of handicap or disability, or familial status.

It is the policy of Gwinnett County that no person shall, on the grounds of political affiliation, religion, race, color, sex, handicap status, age, financial status, or national origin, be excluded or, be denied the benefits of, or be subjected to discrimination under any program or activity administered by the Gwinnett County Community Development Program.

Persons who feel they have been discriminated against or have a complaint pertaining to the Gwinnett County Consolidated Plan, plan amendments, or performance report may file a complaint, in writing, with:

Official Representative, HUD Grant Programs
Gwinnett County Department of Financial Services
Gwinnett Justice and Administration Center
75 Langley Drive
Lawrenceville, Georgia 30045-6900

The Complaint must contain the following information:

- (1) Name and address of the Complainant (person[s] filing the complaint);
- (2) A description of the act or acts considered to be in violation;
- (3) Other available pertinent information which will assist in the investigation of the complaint.

Such complaints should be filed within 60 days of the alleged discriminatory act. A written response as to the disposition of the complaint will be issued not later than 15 working days after the receipt of the complaint. The response will include information concerning the right of appeal, should the complainant disagree, in whole or in part with the resolution. A complainant who is dissatisfied with the response to a complaint. Such complaints should be filed within 60 days of the alleged discriminatory act. A written response as to the disposition of the complaint, or if the response is delayed more than 15 working days, may appeal in writing to:

Director
Gwinnett County Department of Financial Services
Gwinnett Justice and Administration Center
75 Langley Drive
Lawrenceville, Georgia 30045-6900

A written response as to the disposition of the complaint will be issued by the Director, Gwinnett County Department of Financial Services, not later than 30 working days after the receipt of the appeal. If the complainant is dissatisfied with the response of the Director, he/she may submit the complaint, in writing, to:

Director
Atlanta Office of Community Planning and Development
United States Department of Housing and Urban Development
Five Points Plaza, 15th Floor
40 Marietta Street
Atlanta, Georgia 30303-2806

No person shall intimidate, threaten, coerce, or discriminate against any person because he/she has made a complaint, testified, assisted, or participated in any matter in an investigation, proceeding, or hearing related to a complaint.

The identity of complainants shall be kept confidential, except to the extent necessary to carry out or conduct investigations, hearings, or judicial proceedings arising out of the complaint.

7. CRITERIA FOR CONSOLIDATED PLAN SUBSTANTIVE AMENDMENTS

The Gwinnett County policy regarding substantive amendments to the Consolidated Plan requires that any changes in the Consolidated Plan meeting the Criteria described below requires Public Hearings (as described above), and official approval by the Director of the Department of Financial Services, or the Gwinnett County Board of Commissioners.

- 1.) To make a change in the allocation priorities, or a change in the method of distribution of funds;
- 2.) To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Action Plan; or
- 3.) To change the purpose, scope, location, or beneficiaries of an activity.

The Director of the Department of Financial Services can approve amendments that meet the criteria 1 and 2 below, while all others require approval by the Board of Commissioners.

- 1.) Request for Cities to transfer budget amounts between projects, not to exceed Board approved allocation; and
- 2.) Changes to uses of CDBG/ESG/HOME/ADDI funds that do not alter the total of Board approved budgets, or any major changes in the scope of projects.

8. ADOPTION OF THE CITIZEN PARTICIPATION PLAN AND PUBLIC COMMENT PROCESS

The Gwinnett County Board of Commissioners adopted this Citizen Participation Plan as a part of the Consolidated Plan, 2009-2013. No comments were received from citizens on this Proposed Citizen Participation Plan. Any proposed amendments or revisions to the Citizen Participation Plan will be advertised in the current legal organ of the County and copies will be distributed as with proposed amendments to the Consolidated Plan or Annual Action Plans and the public will be provided 30 calendar days to provide written or oral comments on any and all Citizens Participation Plan amendments/revisions.

The Citizen Participation Plan is made available to citizens, upon request, in formats appropriate for persons with disabilities.

Gwinnett County will make every possible effort to comply with applicable HUD requirements, and will provide for and encourage increased citizen participation in its HUD-assisted programs. Particular emphasis is given to persons of low and moderate-income.

For further information concerning the Gwinnett County Community Development Program contact:

Official Representative
HUD Grant Programs
Gwinnett County Department of Financial Services
Gwinnett Justice and Administration Center
75 Langley Drive
Lawrenceville, GA 30045-6900
Telephone: (770) 822-7873
Fax: (770) 822-7887
Email: tanikia.jackson@gwinnettcountry.com

OR

Director
 Gwinnett County Community Development Program
 [Administered by W. Frank Newton, Inc. Program Management Firm]
 575 Old Norcross Road, Suite A
 Lawrenceville, GA 30045-4367
 Telephone: (770) 822-5190
 Fax: (770) 822-5193
 TDD: (770) 822-5195
[Email: gchcd@gwinnettcountry.com](mailto:gchcd@gwinnettcountry.com)

9. PLAN FOR MINIMIZING DISPLACEMENT/ASSISTANCE FOR DISPLACED PERSONS

No displacement should occur as a result of the activities to be undertaken by Gwinnett County under this Plan. However, federal regulations require that each recipient provide a plan of action to assist persons in the unlikely event of displacement. If displacement should occur, Gwinnett County will implement the provisions required by 24 CFR Parts 42, 92 and 570, and as outlined in the County's residential anti-displacement and relocation assistance plan originally implemented in 1988, which follows:

GWINNETT COUNTY
HOUSING AND COMMUNITY DEVELOPMENT PROGRAM
RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION PLAN [RARAP]
1988 - UPDATED 2004, 2008

Gwinnett County's policy to make all reasonable efforts to insure that activities undertaken through the use of Entitlement Grant Funds awarded by the United States Department of Housing and Urban Development [Community Development Block Grant (CDBG) Program, HOME Program/American Dream Downpayment Initiative, and the Emergency Shelter Grants (ESG) Program funds will not cause unnecessary displacement or relocation. In fact, Gwinnett County's policy is to provide HUD grant financial assistance to projects which contain no plans for displacement. The County will continue to administer its HUD Entitlement Grants Programs in this manner. Careful consideration will be given during the planning phase with regard to avoiding displacement. Displacement of any nature shall be reserved as a last resort action necessitated only when no other alternative is available.

If displacement is precipitated by activities which require the acquisition (either in whole or in part) of real property directly by Gwinnett County, all appropriate benefits required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (84 Stat. 1894; 42 U.S.C. 4601 et. seq.; Pub. L. 91-646), as amended, and referred to as the "Uniform Act", shall be provided to any displaced person(s). Persons displaced by rehabilitation, or "Non-Uniform Act" acquisition, financed (in whole or in part) with HUD Entitlement Grant funds shall be provided relocation assistance in accordance with one of the following: (1) the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as required under Section 570.606(a) and HUD implementing regulation at 24 CFR Part 42; (2) the requirements in Section 570.606(b) governing the Residential Anti-displacement and Relocation Assistance Plan under Section 104(d) of the Housing and Community Development Act of 1974, as amended; (3) the relocation requirements of Section 570.606 (c) governing displacement subject to Section 104(k) of the Act; (4) the relocation requirements of Section 570.606(d) governing optional relocation assistance under Section 105(a)(1) of the Act; and/or, (5) the provisions of 24 CFR Part 92.353 for the HOME Program and for the FY 2003 funds for the American Dream Downpayment Initiative (ADDI). Note: Beginning with FY 2004, ADDI funds are not subject to the URA.

Residential Anti-Displacement and Relocation Assistance Plan

A. Provisions for One-for-One Replacement

Gwinnett County will replace all occupied and vacant occupiable low/moderate-income dwelling units demolished or converted to a use other than as low/moderate income housing as a direct result of activities assisted with funds provided under the Housing and Community Development Act of

1974, as amended, and as described in 24 CFR Part 570.606(b). Low/moderate income replacement units may include public housing or existing housing receiving Section 8 certificate or voucher assistance.

All replacement housing will be provided within three years of the commencement of the demolition, or rehabilitation, relating to conversion, and will meet the following requirements.

1. The units will be located within the County.
2. The units will meet all applicable County housing, building, and zoning ordinances.
3. The units will be designed* to remain low/moderate income dwelling units for at least 10 years from the date of initial occupancy.

* Design refers to fiscal structure as well as building structure.

Before obligating or expending HUD Entitlement Grant funds that will directly result in such demolition or conversion, the County will make public and submit to HUD the following information in writing.

1. A description of the proposed assisted activity.
2. Once identified, the general location on a county map, including the approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than low/moderate income dwelling units.
3. A time schedule for commencement and completion of the demolition or conversion.
4. Once identified, the general location on a county map and the approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement units.
5. The County will identify the source of funding at the time of submittal, and will provide the replacement dwelling units within three years of demolition or conversion.
6. The basis for concluding that each replacement dwelling unit will remain a low/moderate income dwelling unit for at least 10 years from the date of initial occupancy.

Consistent with the goals and objectives of activities assisted under the Act, the Gwinnett County Community Development Program will take the following actions as a result of HUD Entitlement Grant assisted activities:

1. If a major housing demolition program is ever contemplated, it will be structured so that only vacant, dilapidated units will be inspected and considered for demolition.
2. If the Gwinnett County Housing Rehabilitation Program which involves demolition and reconstruction on the site, Gwinnett County will meet its one-for-one replacement requirement once the housing units are fully reconstructed. The County may choose to provide temporary relocation assistance for the families involved.
3. Provide information to and keep citizens involved in the process regarding pending zoning and rezoning actions that threaten the preservation of residential areas.

B. Provisions for Relocation Assistance for Residential Anti-Displacement

Gwinnett County will provide relocation assistance, as described in 24 CFR 570.606(b)(2) and in 24 CFR 92.353 to each low/moderate household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of HUD Entitlement Grant-assisted activities. Persons that are relocated are entitled to:

1. A choice between actual reasonable moving expenses as described in the Federal regulations, or a fixed expense and dislocation allowance, as described in the Federal regulation.
2. Advisory services as described in 24 CFR Part 42, Subpart C.
3. Reimbursement for reasonable and necessary security deposits and credit checks.
4. Replacement housing assistance which may include a Section 8 housing

voucher/certificate and referral to an assisted unit; cash rental assistance to reduce the rent and utility costs or lump sum payment equal to the present value of rental assistance installments to be used toward purchasing an interest in a housing cooperative or mutual housing association for a period of up to five years.

II. Section 104(k) Relocation Requirements

Gwinnett County will provide reasonable relocation assistance to persons (families, individuals, businesses, non-profit organizations, or farms) displaced (moved permanently and involuntarily) as a result of the use of HUD Entitlement Grant assistance to acquire or substantially rehabilitate property. Assistance to displaced persons may include:

- A. Payment for actual moving and relocation expenses, documented by receipts and/or vouchers from service providers and utility companies. The documents shall be submitted to the Gwinnett County Housing and Community Development Program prior to the disbursement of payment.
- B. Advisory services necessary to help in relocating.
- C. Financial assistance sufficient to enable the displaced person to lease and occupy a suitable, decent, safe and sanitary replacement dwelling where the cost of rent and utilities does not exceed 30 percent of the household gross income for a period of up to twenty-four months.

III. Optional Relocation Assistance

At its discretion, Gwinnett County may provide relocation payments and other relocation assistance for individual families, businesses, non-profit organizations, and farms displaced by HUD Entitlement Grant-assisted activities, not subject to the provision of the Uniform Relocation Act, Residential Anti-Displacement and Relocation, or Section 104(k) Relocation Requirements. Person(s) voluntarily participating in a HUD Entitlement Grant-assisted activity may, but not necessarily, be provided benefits at the County's option, contingent upon the nature and amount of the benefits derived by the person from the assisted activity and the availability of other resources to the person(s). When suitable public housing or governmental rental assistance (Section 8 Housing Certificates or vouchers, etc.) is not available, or appropriate, the following benefits may be provided if it is determined by the County that such benefits are warranted and appropriate:

A. Temporary Relocation Benefits

If it is determined by the Gwinnett County Community Development Program that the occupant(s) of a dwelling should be relocated temporarily in order to permit rehabilitation or replacement of a dwelling, the Gwinnett County Community Development Program may locate a decent, safe and sanitary dwelling for their temporary use. Benefits, if provided, will be limited to increases in monthly housing costs incurred by the occupant in an amount equal to the lesser of twelve (12) times the increase, or \$2,000, and reasonable moving and storage expenses. Gwinnett County may waive the maximum limits or costs for Temporary Relocation benefits, on a case-by-case basis.

B. Permanent Relocation Benefits

If it is determined by the Gwinnett County Community Development Program that occupants of a dwelling should be permanently relocated, the Gwinnett County Community Development Program may assist in the relocation to a decent, safe, and sanitary dwelling unit. Benefits, if provided, will be limited to increases in monthly housing costs incurred by the occupant in an amount equal to the lesser of 24 times the increase, or \$3,600, and reasonable moving and storage expenses.

C. Moving and Storage Expenses

For dwelling occupants temporarily or permanently displaced, fixed benefits for storage and moving may be allowed. Those benefits may include:

1. Utility connection fees up to \$500- only if the fee is the responsibility of the tenant.
2. Storage expenses, not to exceed \$500.
3. Moving costs based on the latest published schedule published in the Federal Register by the United States Department of Transportation, Federal Highway Administration. [See Attachments, under the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, Fixed Residential Moving Cost Schedule, under 49 CFR Part 24.302:

[Moving costs would be allowed per the same schedule for both moves required for temporary relocation.]

4. Insurance for the replacement value of the property in connection with the move, and storage up to \$500.
5. Gwinnett County may waiver the limits on costs for temporary moving and storage expense on a case-by-case basis.

IV. Tenant Assistance Policy/Rental Rehabilitation

- A. It is not the County's policy to displace families in rental units. Participating landlords warrant that the proposed rehabilitation will not cause any tenant to be permanently displaced unless the owner will be able to relocate the tenant displaced in accordance with HUD/Gwinnett County relocation criteria. Rental Rehab funds will not be used to rehabilitate any structures, if the rehabilitation will cause displacement of very low income families.
- B. If it becomes necessary for an owner to move a tenant from a unit as a direct result of rehabilitation assisted through rental rehabilitation funds, the owners will assure that the tenant is offered a decent, safe and sanitary dwelling unit at an affordable rate, as described in the applicable regulation. No tenant will be considered displaced if the owner has offered the tenant a decent, safe, sanitary and affordable unit.
- C. Should displacement become necessary for a lower income family as a result of the rental rehabilitation assistance, the owner will assure that tenants will be provided the necessary financial assistance, information, counseling, and referrals, housing location options, information regarding Federal Fair Housing rights, and other relocation services as needed, without regard to race, color, religion, sex, age, handicap, or national origin, so as to enable the family to obtain decent, safe and sanitary housing at an affordable rent.

SURVEY OF NEEDS – NEEDS ASSESSMENT PROCESS

Gwinnett County elected to interview organizations serving low and moderate-income individuals directly in early 2008 on issues and needs which should be addressed in the Unified Plan. Phone interviews were conducted with several agencies, municipalities, and neighboring counties that may or may not have given input during the preparation of the 2009-2013 Consolidated Plan. Stakeholders discussed their current needs, concerns and issues related to housing and community development and any noticeable changes experienced since the 2005 survey. Appendix 1 highlights three key questions posed during each interview. Some additional questions are shown herein.

Interviews were held with public and non-profit organizations, as follows:

- disAbility Link of Metro Atlanta
- Partnership for Community Action
- Gwinnett County Senior Services
- Gwinnett County Community Services
- Gwinnett County Habitat for Humanity
- GRN Community Service Board
- Gwinnett County Association for Retarded Citizens, Inc. [d/b/a Hi-Hope Service Center]
- Partnership for Domestic Violence
- Rainbow Village, Inc.
- The Sheltering Arms, Inc.
- AID Gwinnett
- The IMPACT! Group, Inc. [Formerly Gwinnett Housing Resource Partnership, Inc.]
- United Way Gwinnett
- Gwinnett Coalition for Health and Human Services
- Housing Authority of the City of Lawrenceville
- Norcross Housing Authority
- City of Norcross
- City of Duluth
- City of Lawrenceville
- Forsyth County
- Walton County
- Hall County

Comments Received at the Needs Assessment Interviews:

January / February 2008

Rebecca Ramage-Tuttle, disABILITY Link

disABILITY Link offers a multitude of services for the Atlanta Metro's disabled resident community. These include: nursing facility transition services; consulting services on ADA compliancy for businesses; training, advocacy and awareness; case management; employment placement; home modification; leadership training; and independent living assistance.

The main needs/problems identified were: (1) the provision of accessible, affordable transportation, (2) provision of accessible, affordable housing, and (3) in-home community and supportive services.

In terms of transportation, more integrated systems are needed particularly at job centers in the larger cities: Duluth, Lawrenceville, and Norcross. Key for the disabled community is accessible transportation and connectivity links. There is a need for ADA-compliant bus shelters, safe curb and sidewalk infrastructure, and sensitive street improvements. These links are vital to connect the disabled population to employment opportunities and foster a more independent lifestyle.

Accessible affordable housing is an ongoing concern. disABILITY Link only serves the local population in a piecemeal fashion due in large part to a limited budget capacity. For home modifications, disABILITY link really needs a full-time staff person that can modify homes or manage a crew for multiple home modifications. Recommendations for the County include instituting design guidelines for new disabled housing and home modifications (i.e., – no-step entrances, wide entryways, plank doorknobs, wheelchair ramps, etc.), allowance of smaller one-level homes, denser housing development at job centers and commercial nodes, and stricter code enforcement to ensure ADA-compliance in new home construction and rehabilitated units. If a number of these practices were put in place, more independent living options could become available for disabled residents not necessarily needing institutional care. This in turn could allow more spots to be available for those in true need of institutional care.

Disabled residents of prime working age are the population sect that could benefit most from in-home support. Many working-age disabled residents could potentially earn a living if they had the spectrum of support services and/or housing choices.

Measurable outcomes could include an increase in the number of disabled residents living independently, an increase in the amount of available ADA-compliant housing options, and improved economic status of disabled population due to increased transportation options.

Mohammed Saleem, President/CEO, Partnership for Community Action

The main foci for Partnership for Community Action, Inc. are early childhood education and childcare, family self-sufficiency support, employment services, small business support, and low-income housing/weatherization services for their target constituency. PCA is an independent organization, not a grantee of Gwinnett County. PCA does, however, work with the County on low-income housing and weatherization needs of their target population.

The challenges faced currently are coordination among various County organizations, including Gwinnett Coalition for Health and Human Services and Gwinnett County Department of Family and Children Services. PCA desires to work with the County more regularly, in particular for housing needs and programs, but also for employment services (job training and readiness). PCA has a deep network of partners, including cooperative ministries, other religious organizations, and Georgia Power.

PCA is currently located in Lilburn, but looking to move into a larger facility in Lawrenceville if possible. Lawrenceville allows for more direct access to their target population and may offer larger space accommodations to serve various needs.

PCA is in agreement that denser housing, housing choices in proximity to other goods and services, and better transportation networks are useful actions that can support their client base.

Linda Bailey, Gwinnett County Senior Services

Gwinnett County struggles to keep pace with the demand for additional senior facilities and programs. GCCS encompasses not only facilities, but also the health and wellness of seniors. It offers resources to prolong the self-sufficiency of seniors until they reach the point of dependency. It also offers centers with commercial kitchens in Lawrenceville, Buford and Norcross. Additional senior facilities are a definite need, as the senior population is expected to almost triple by 2010. The small senior spaces attached to larger recreational facilities are not sufficient. They need full-service senior centers that allow for the proper programmatic needs to serve this age group.

Transportation is another area of need for seniors. The current fleet of vehicles to transport seniors to medical appointments and existing senior centers is not enough. There are currently 80 people on the waiting list for

transportation to medical appointments, up from 50 in 2005. Gwinnett's existing public transportation infrastructure is inadequate.

Housing is also a major concern for seniors. They have a number of 55+ communities, but those are not affordable to many seniors with limited means. Plus, many of the seniors served by Community Services are looking to downsize to smaller units with minimal property maintenance. Many of the facilities reserved for senior are obsolete or falling apart. Some are towers, which give the impression of institutional housing. More livable communities within a mix of uses and located at transportation nodes would suit this community very well. Denser development (either low-rise senior apartments or small homes—1200 to 1500SF—with minimal lot sizes) are preferable. Redeveloping obsolete shopping centers into mixed-use or senior communities is another possible option. There is also the issue of prevailing homelessness among seniors and the strain to support them. Many of the shelters are for families (women and children) and unless the seniors are caregiving grandmothers, they are not eligible.

Measurable outcomes include a healthier senior community, better self-sufficiency and more housing options, better accessibility to points of interest and nodes of activity, and fewer burdens on nursing homes and assisted living institutions.

Phil Hoskins, Gwinnett County Community Services

Gwinnett County Community Services (GCCS) is the umbrella agency for senior services and health and human services. They also affiliate with Gwinnett County Department of Family and Children Services, the Georgia Board of Health, Parks and Recreation and Meals on Wheels.

The problems GCCS faces now are infilling parkland in established communities like Norcross. Not a lot of open space is left in these communities because of their growth over the past few decades. Some facilities serve at capacity. Others need to be renovated. The SPLOSTs have been instrumental in providing financial resources to build new parks and facilities in other areas of the County.

GCCS relies heavily on the contributions of nonprofits and faith-based communities to assist with health and human service needs, homelessness, and affordable housing. Cooperative ministries in Lilburn, Norcross, Lawrenceville, Buford, and South Gwinnett offer food pantries, clothing needs, emerging housing, and utility assistance.

Gwinnett County's explosive cultural growth over the past few years caught the County off guard. The growing ethnic populations changes the demand and need for housing, economic development and transportation. The County is trying to respond accordingly to meet the needs.

GCCS has a joint-use agreement with the Board of Education, in which public facilities are used for both school and neighborhood purposes.

Charles Craig, Gwinnett Habitat

Gwinnett Habitat's biggest challenges are finding contiguous pieces of land to build houses and developing amidst the rising costs of land. Gwinnett Habitat is very much in favor of regulatory amendments that allow for smaller home square footages, smaller space requirements for parking, and more units per acre. In Lawrenceville, an affordable townhouse project is underway—their first project of this kind. Much of Gwinnett County's workforce is blue-collar. They need all the help possible to afford housing, transportation to their jobs and services, and nearby community services. Promotion of mixed-use nodes and integrated transportation networks would alleviate some of the issues created from the existing separation of uses.

The County allocates HOME funds annually to finance development costs, though the annual allotment varies due to specific spending needs of the year. Habitat supports mostly families, but do have "visitable" floor plans that align with the needs of the disabled and elderly.

David Crews, GRN Community Services Board

GRN Community Services Board is a public mental health agency, providing a full range of services to substance abusers, adults with developmental disabilities, adults with mental illness, and youth and adults with severe-persistent behavioral problems. GRN attempts to be the low-cost answer to assisting the aforementioned target population with living independently and remaining employed. Their constituency are usually severely mentally ill individuals, addicts, and on Medicare. They receive funding from the State Department of Human Resources for those they serve that are uninsured.

GRN runs outpatient centers, residential services (group homes), supervised apartments, crisis stabilization center (adults only) and a substance abuse center. The locations of these centers are proportionate to the socioeconomic distribution of Gwinnett County.

GRN does apply for HUD funding annually. Recent allocations of CDBG fund helped to construct a 16-bed 7,500 square-foot Crisis Stabilization Center. In the past, GRN has typically received roughly \$5,000 for mentally ill homeless or homeless with substance abuse problems through HUD's Emergency Shelter Grant. This allocation was used for temporary hotel space and transitional housing options. GRN has also received funds in the past for vehicle purchases to transport their constituency to medical services.

Regarding existing needs, transportation and housing are most paramount. There is a growing need for a handicap equipped fleet of vehicles in addition to the replacement of older vans or shuttles. The biggest challenge with housing is the rising costs of rents. GRN operates 24-hour care facilities, provides residential placement in privately owned properties (apartment communities, etc.) and develops their own housing when possible. GRN has its own campus of facilities in Newton County, including a 20-bed apartment complex and 36-bed group home facility. The campus is about 5 to 7 acres. Something similar in Gwinnett County would be particularly very useful. Such a campus can be a redevelopment option for an existing, obsolete use.

No specific design or architectural considerations are necessary for their housing needs. New construction just needs to be durable in terms of the materials used and building maintenance. The turnover of space is frequent.

One growing issue is the charge to provide housing for people with addictions who are coming out of prisons. Private properties do not allow those with a criminal record to live on their premises. Gwinnett's growing population brings increasing crime issues. Thus, it will be particularly difficult to care for this specific client base.

Alice Cunningham, Hi-Hope Service Center

The Hi-Hope Service Center is a private, nonprofit organization geared to serving residents with developmental disabilities. The Center offers daily employment services, in-home healthcare, and residential services. HiHope receives about \$137,000 annually to subsidize their residential programs and service their six group homes. The Center had to add nursing services to assist with some aging long-term clients. It currently serves about 140 individuals in addition to 16 individuals via in-home health care and 25 in specific residential programs. Other centers include Annadale Village, which houses and care for 80 to 90 developmentally disabled and severe brain trauma individuals, and Creative Enterprises, which cares for approximately 80 to 100 individuals in job training and day services.

Respite services and afterschool programs are two areas of need currently. Respite services are offered monthly and allow families to take a break from their child or adult child for a day. Additional funds could allow for this program to occur more frequently and/or for more staff to accommodate the need. Afterschool programs for severe special needs kids currently serve approximately 20 children under the age of 12. Programs for kids 12 and older are of great need within the County. Typically, 12 years of age is the cut off point for afterschool care. Additional funds could allow existing facilities (schools, community centers, etc.) to be open past usual hours and pay staff to look after children. The afterschool care would be bare bones (i.e., no special programs or use of teachers) to keep costs down. Participating families would need subsidy (perhaps sliding scale) to help them pay for costs of care.

Transportation is another area of need. Gwinnett County has very limited public transportation. The problem has become even more apparent with the population growth and the growing needs of various ethnic groups. There is a need all across the county for additional paratransit vehicles and wheelchair-accessible vans. A certain amount of wheelchair-accessible busses are required per every certain number of regular busses. The mandate to provide

wheelchair-accessible busses instead of vans contributes to the expense of this service. Paratransit in the form of vans would be much less expensive and could assist in transporting those in need. Gwinnett County hires a subcontractor to run the paratransit vehicles. Typically drivers wait until there is a call for services, which is an inefficient way of operating transportation services. There needs to be better coordination with paratransit and the service providers that need it for their populations. There is also no replacement plan for vehicles and a number of the fleets are old. Discussions with Partnership Gwinnett are planned to talk and resolve some of these issues. Solutions could help not only those served by Hi-Hope Service Center, but all of Gwinnett County's growing disabled and senior populations.

Affordable accessible housing is another issue. Hi-Hope Service Center is about to deliver two brand new and three renovated accessible dwellings, but it has been a hard road. NIMBYism is widespread. Residents do not like the idea of additional group homes in their neighborhoods, fearing it could inhibit their quality of life, despite the presence of full-time healthcare staff. In addition, group homes are considered "commercial properties" so the requirements in terms of water/sewer and fire codes are a lot more extensive than residential properties, which in turn makes projects more expensive and more time-consuming. Septic tank requirements make sitework more expensive as well. Even the search for adequate sites has become much more challenging and it is difficult to find adequate existing housing that meets the needs of disabled persons. Development inside of Gwinnett's cities also comes with challenges due to inhibiting codes and ordinances. Currently, Hi-Hope Service Center is fortunate if they get one unit per year up and running due to these barriers. They would love to do as many as four or five a year.

Cathy Willis Spratz, Partnership for Domestic Violence

PADV helps 20,000 women in crisis annually. Their shelters serve approximately 750-800 women. Women in crisis are usually given a 90-day deadline to stay in the shelter, but if they are showing true promise and progress, PADV extends it if necessary. Their current emergency shelter in Gwinnett needs to be torn down and rebuilt. It is an old, converted farm house that can house 32 women and children, but it is very obsolete. More capacity in the new facility is also desirable.

Most of their attention currently is committed to a capital campaign for Fulton County. PADV are constructing a new shelter there, which will likely take 1.5 years to complete. Gwinnett County is next.

PADV also have a transitional housing program, in which current monies come through a HUD grant. However, GA Coalition Against Domestic Violence is the grantee and it disburses funds among all of its partners. PADV manages nine apartments in different locations. Though dispersion into the community is best practice, PADV does prefer housing to be together in order to serve their population more easily. If funding ever allowed the opportunity to develop their own transitional housing facility, PADV would be interested in option as well.

Nancy Yancey, Rainbow Village, Inc.

Rainbow Village's mission is to assist homeless families with children to become self-sufficient. Rainbow offers life skills training, counseling services, youth programs, furnished housing, etc. North Atlanta Metro is the target area, which includes all counties north of 285, but the physical office is located in Gwinnett. Rainbow Village owns eight units in Duluth and four in Norcross, but there is still a substantial need for additional transitional housing. The IMPACT! Group provides fourteen transitional housing units and Traveler's Aid provides four transitional housing units. The biggest gap is emergency shelter for women and children.

Rainbow Village requires families to be employed and have a means of transportation. Families are accountable for rent on a sliding scale and contribute a minimum of \$300 a month into an interest-accruing savings account, which becomes unfrozen when they finish the program. The program is typically one to two years, but Rainbow provides assistance for up to five years if need be.

The top three County issues are lack of affordable housing (mainly family housing), lack of adequate transportation, and lack of affordable childcare.

Elaine Draeger, Sheltering Arms

The mission of Sheltering Arms is to provide children with 0 to 5 years of age with high-quality early childhood education. Sheltering Arms also works with parents to provide the best educational environment for children of low- to moderate-income families. The organization does provide services for some market-rate families as well, but their percentage of market-rate families to low- to moderate-income families is 15 percent. For adults, they provide a comprehensive network of services, including life skills training, self-sufficiency seminars, goal setting, financial literacy and transportation.

The organization serves seven counties in the Metro Atlanta region and has three centers in Gwinnett County: Norcross, Duluth, and Lawrenceville. The Norcross facility holds space for Sheltering Arms (16,000SF) and the Boys and Girls Club (30,000SF) and Sheltering Arms recently received CDBG funds to retrofit the facility. The Lawrenceville facility is owned by the county and was built with CDBG funds in 1993. The facility in Duluth is leased space through 2010. The owner of this facility wants to sell the property and Sheltering Arms has elected not to purchase the facility due to its site configuration, inefficient layout, and difficulty with future expansion. Sheltering Arms could use CDBG funds to purchase a new facility in Duluth. A facility with at least seven classrooms that can hold at least 100 kids would be most feasible for their operations. All of their facilities hold adult training and childcare programs and serve as hubs within the County. They also serve smaller childcare facilities throughout the county with educational resources and information.

Recently a study was completed to evaluate the need for more early childhood centers within Gwinnett County. The result came to roughly 20 centers based on the assessment of population, school enrollment, and income status. If more funds were available to build additional centers in other incorporated and unincorporated areas, they would consider it.

Transportation is a constant issue within Gwinnett County. Sheltering Arms currently holds a fleet of minibuses to transport their students to and from the facilities. The current fleet of vehicles is well-maintained and no huge need for additional vehicles at the present time. There is a need to replace the utility van, which is used by their custodian to perform maintenance on their three facilities within the County.

Larry Lehman, AID Gwinnett

AID Gwinnett is a grassroots not for profit organization founded in 1990 in Gwinnett County by family members and friends of those living with HIV and AIDS. The primary focus is to provide supportive services and prevention education/outreach. Services expanded out to Rockdale and Newton Counties as the need grew for additional services.

AID Gwinnett has assisted over 900 clients and their families. Cumulative caseload in 2007 was 563 clinic/client services for all three counties and 24,000 for prevention outreach. About 80 percent of this caseload is in Gwinnett County, while the Newton and Rockdale Counties collectively compose the remaining 20 percent. Most of the need among those with HIV and AIDS is equally distributed across Gwinnett County, with Duluth having a slightly higher percentage due to the city having more multifamily units than other areas.

Some of the challenges facing those with HIV and AIDs are a lack of transitional housing supply. The Count aggressively targeted the pay-per-night motels to halt operations, but no resolution was made to turn these problem properties into affordable housing solutions for those with HIV and AIDS, substance abuse problems, or low-income individuals. Though it is not good practice to concentrate such individuals, these problem properties may be able to alleviate the strain on affordable shelter options.

Another challenge is high rent ceilings. Many of those with HIV and AIDs are young (not seniors) with very limited means and/or at risk of homelessness. The lack of affordable housing and accessible affordable housing for this clientele is a real problem. There is only one children shelter and one women shelter in the County. No shelter for men exists.

A better transportation network is a definite need in Gwinnett County. The AID Gwinnett facility must be located along a bus route, so that clientele can have access to their services. They use funding from HOPWA to provide

last-resort taxicab services and bus passes and to operate their own transportation vehicle. They operate their vehicles only for medical purposes and are steadfast in their policy for using their vehicle as a last resort. Even if conditions were ideal to operate and own additional vehicles, AID Gwinnett would not want to participate in providing transportation services. It is a real challenge to provide such limited service for such a great need. Better transportation links within the County itself should be the solution to answering resident mobility issues.

The constraints put on by zoning also make it difficult to increase the supply of smaller, affordable housing. The effects of immigration within Metro Atlanta have created social complexities not evident in previous decades. But the region needs to collectively embrace this change in the social, economic and physical fabric. Gwinnett County and the region have real problems that need real attention and real solutions.

Tony Mitchell, IMPACT! Group

IMPACT!'s foreclosure prevention program has experienced an influx in potential participants given recent market trends. IMPACT! averages eight to nine new cases per month. Many more than nine households apply monthly, but some cases are too far into foreclosure to save or provide adequate preventative assistance. IMPACT! also does not have enough staff capacity to handle more volume. The foreclosure momentum will likely continue through the late 2009.

The transitional housing program currently serves only women and children. There are about 20 to 25 units reserved for transitional housing and they are always full. These units exist on scattered sites. IMPACT! Group has helped 24 former homeless persons become homeowners via the transitional housing program and homeownership counseling. But there is definitely a need for more shelters as an alternative to extended stay hotels.

CBDG funding allows foreclosure prevention and downpayment assistance, but it can be an administrative challenge.

In terms of the provision of housing, rising construction and land costs cause a large strain affordable housing. Regulatory requirements also challenge the provision of housing either for time lost from permitting/inspection schedules or additional site preparation mandates from zoning. The County would benefit from requiring set-asides from new housing developments to fund or produce affordable housing projects. Affordable and accessible senior housing is in large demand as well.

Demetrius Jones, United Way Gwinnett

The United Way serves the Atlanta Metro region with an emphasis on policy development related to early childhood education and eliminating homelessness. United Way does not run programs, but rather supports strategic initiatives to develop effective early learning childcare and eradicate homelessness.

The initiatives on homelessness look at a comprehensive, regional approach to ending persons and families in crisis. United Way is part of the Continuum of Care and the agency shares responsibility in identifying gaps in service (transitional housing, emergency housing, shelter capacity, etc.). Concentrations of homelessness reside in Norcross, Lawrenceville, and Duluth. The recent homeless count will provide more information on the magnitude of homeless.

Early learning childcare benefits from great support from the community and local public school systems. Childcare providers work frequently alongside the school system administration, standardizing the curriculum and creating daycare programs that meet the needs of the growing population. The goal is to have kids ready to read by six years of age. United Way assists in a holistic manner, assessing accomplished goals and achievable strategies. United Way would like to expand support for early learning childcare through better connection with parents, HUD and other agencies, and expanding programs such as SPARC to broaden their reach.

Ellen Gerstein, Gwinnett Coalition of Health and Human Services (GHHS)

GHHS' focus is on positive youth and child development (early childhood education, youth development, high risk behaviors), strengthening individuals and families (independent living for seniors/disabled, optimum mental and

physical health), and strengthening the community (environmental health, housing/homeless, economic self-sufficiency). GHHS' 2008 budget breakdown is as follows: \$163,000 for the Helpline; \$50,000 for Family Connection; and GNLI (\$52,000). In 2007, the total number of referrals to the Helpline was 18,125 with the majority (10,850 or 60 percent) being for emergency assistance. Most of the referrals for emergency assistance (75 percent) were for help with rent or utility assistance, emergency shelter or housing. Due to the limited resources for emergency assistance, many calls still go unsatisfied.

Regarding youth and child development, statistics on critical risk factors for youth (teenage pregnancy, youth drop-out rates) in Gwinnett County are lower on average than the state as a whole, though the percent of children receiving free or reduced lunch in Gwinnett as doubled since 2000 to 40 percent.

The number of Gwinnett residents declaring bankruptcies doubled from 1998 to 2005. Health costs are one of the main reasons county residents file for bankruptcy. The number one reason for homelessness in Gwinnett has been displacement by way of eviction and foreclosure. In 2000, there were 1,677 evictions and foreclosures within the County. By 2006, the number increased to 6,130 countywide.

One of the biggest challenges to progress is community denial. Some residents do not think Gwinnett has any community development problems, which can create an obstacle to meeting the needs. Groups like GHHS struggle to meet such large needs of the growing population.

Crime stemming from domestic violence and families without health insurance represent a growing problem within the County. Costs of those under-insured put a strain on area hospitals and clinics. Inadequacies in public health funding formulas further limit the amount of reach of state health dollars.

GHHS' cluster centers are located in Buford, Norcross and Centerville with an additional center in talks for Lawrenceville. GHHS has a number of community clinics throughout the county as well. GHHS has also established the Gwinnett Neighborhood Leadership Institute, which is a program to train grassroots leaders on how to take an active role in their communities. This institute focuses on a volunteer interpreter program, children's shelter building/recreation project, neighborhood beautification, community playground projects, and pedestrian safety crossing events.

GHHS has had many accomplishments, but needs increases in funding for Emergency Assistance (EFSP), a redirection of funds from community providers like Gwinnett County Government and United Way, and an overall increase in funding for Health and Human Services to be even more effective over the long-term. In addition to funding resources, GHHS want to continue to level public/private partnerships from businesses, agencies, nonprofits and others.

Josh Campbell, City of Suwanee

The City of Suwanee received CDBG funds for sidewalk improvements about 10 years ago and has not used entitlement funds since then. The problem is that the amount given previously was not substantial and administration costs ate up a lot of the grant. The City has typically relied upon general obligation bonds, tax allocation district financing, and SPLOSTs for capital funding and other needs. That being said, the City welcomes the opportunity for more coordination with the County to resolve countywide and citywide issues related to housing and community development.

Cliff Cross, City of Duluth

The City of Duluth is receptive to better coordination with Gwinnett County on issues of housing and community development. The City's biggest push has been economic development, specifically the creation of jobs and additional businesses. The City wants to get more involved with Partnership Gwinnett's regional approach and definitely has something to gain from coordination with the county and other jurisdictions. The establishment of revolving loan funds and other monies to foster commercial investment are instrumental to the City's long-term economic prowess. This can spur jobs and create opportunities for a variety of individuals.

Jennifer Peterson, City of Norcross

The City of Norcross consists of approximately 10,000 residents. The biggest needs for CDBG funds were sidewalk improvements to accommodate those with disabilities and retrofitting some historic properties to make sure they

were ADA-compliant. No other major issues pending at the present time.

Johnnie Mabe, Norcross Housing Authority

Norcross Housing Authority has 44 units, some of which are vacant. The authority uses HUD allocations for renovations of existing facilities. If any additional funding allotments were issued, NHA would use them for new windows and weatherization of their existing scattered site housing. Labor costs are the most challenging aspects of renovation and weatherization.

Lejla Prjlaca, Lawrenceville Housing Authority

High on LHA's list of priorities is capital fund improvements (i.e., repaving streets, replacing the roof of existing public housing units, systems modernization, etc.). They have 212 housing units with a waiting list of 189 families (e.g., 90-1BR [majority elderly], 47-2BR, 38-3BR, 10-4BR, 4-5BR). The largest demographic served are single mothers with children and elderly residents. LHA has a great need for senior services and try to also serve the homeless where possible. LHA can use HUD entitlement funds for unit/systems modernization, rehabilitation and maintenance. LHA would like to develop its own public housing in the future if possible.

Carol Haag, Forsyth County

Forsyth County responses to questions:

What are some pressing issues/needs/problems your county faces in regard to:

Provision of affordable housing?

The county has limited affordable housing. Many individuals that need affordable housing live in neighboring counties.

Provision of adequate special needs housing (accessible to disabled and aging residents)?

Growing senior population needing affordable, accessible housing, as the county has limited affordable housing for elderly. In addition, seniors who need affordable housing oftentimes need housing modified to accommodate wheelchairs or other ADA requirements. Transportation can be another problem if housing is not within easy walking distance (or located in a high traffic area) to a grocery store, drug store, medical services or other services that seniors typically need.

Economic development?

The Cumming-Forsyth Chamber of Commerce takes the lead on economic development efforts in the county. The county has an appointed staff person to work with the chamber and the state on project selection.

Workforce development?

The county has not implemented any workforce development programs. Lanier Technical College is located in Forsyth County and provides an alternative to traditional higher education.

Regional/area public transportation?

The only public transportation in the county is the GRTA Express Bus and the county's Dial-A-Ride service, used by many of the seniors.

Growing infrastructure needs

Forsyth County is one of the fastest growing counties in the nation. Roads and water are primary needs.

Additional needs for community facilities

Forsyth County residents have recently approved a SPLOST VI referendum and a \$100 million bond for parks and greenspace. A senior center is planned in south Forsyth and \$1 million was designated for a community meeting space at Lanier Technical College. Two fire stations were approved in SPLOST VI and a revenue bond referendum is planned for a Sheriff's Administration building. Many existing park buildings will be updated and new ones will be added.

What issues should be a regional priority over the next five years?

Water resources and the expansion of SR 369 as an East/West corridor.

Melinda Quinn, Walton County

Walton County responses to questions:

What are some pressing issues/needs/problems your county faces in regard to:

Provision of affordable housing?

Walton County has a concentration of low-income housing primarily within the City of Monroe, which is causing negative spillover effects countywide in relation to quality of life and neighborhood stabilization. Walton County would be in favor of a plan to better mix housing at all income levels throughout the county and possibly even regionally.

Provision of adequate special needs housing (accessible to disabled and aging residents)?

Special needs (disabled, supportive services) is not a particular problem, but there has been a growing senior/elderly population throughout the past decade.

Economic development?

The County suffers somewhat from a lack of economic diversity and is looking to competitively reposition itself to remain economically sustainable over the long-term.

Workforce development?

Partnerships with area schools and higher educational institutions have fostered enhancements in workforce development throughout the county.

Regional/area public transportation?

The lack of public, affordable transportation in Walton County is of paramount concern and a constant topic at various strategy meetings. This issue crosses the entire spectrum of barriers for accessing health care; seeking & maintaining employment; parental involvement; workforce development; housing accessibility; etc

Growing infrastructure needs

Water is an ever-pressing issue. The County is entering into a regional agreement for watershed.

Additional needs for community facilities

There is a need for additional family and youth centers.

How can some of the above issues be mitigated through regional coordination and/or regional assessment of needs and mismatches?

Transportation---van service between & within counties

What issues should be a regional priority over the next five years?

Better transportation and water resources

What barriers currently exist in addressing these issues in a regional context? How might they be overcome?

The biggest regional challenges are lack of adequate financial resources, political will, and turf guarding among jurisdictions, school districts, and police districts.

Randy Knighton, Hall County

Hall County is receptive to better regional coordination among adjacent counties to combat shared issues and needs related to housing and community development. The County is currently preparing an affordable housing study to assess the housing needs and disparities within Hall County. This report will provide a detailed synopsis on the adequacy of existing stock, the nature of new projects, and the income levels in which housing is out-of-reach among other things. The County wants to merge good affordable housing with quality design, ensuring that the provision of new, affordable housing options is seamlessly integrated into neighborhoods. The County also wants to

diversify its housing options. There is a limited number of multifamily projects available, which excludes potential residents looking for options beyond single family units. The existing residential landscape is quite singular. Subdivisions do not connect and provide a very limited walkable, outdoor experience for the pedestrian.

Hall County has transit and the Metropolitan Planning Organization is undertaking a transit study to examine the efficiency and operations of the existing system. The County wants to also expand its employment centers and create more jobs.

Lead Agency – Consolidated Plan Preparation

The Unified Plan was prepared by PBAmericas and assistance from a number of subcontractors, including Bay Area Economics (BAE0 which prepared the Consolidated Plan appendix of the Unified Plan.

The Gwinnett County Department of Financial Services is responsible for the Consolidated Plan preparation, through its Program Management Firm, W. Frank Newton, Inc. (WFN Inc.). Staff of WFN, Inc. reviewed the BAE prepared documents prior to their completion.

Summary of Citizen Comments on the Proposed Unified Plan

Note: The following is a summary of Citizen Comments received for the proposed Unified Plan:

The Gwinnett County Proposed Unified Plan was made available for public comment from October 1, 2008 – October 31, 2008. The official publication of the proposed plan occurred on October 1, 2008 in the Gwinnett Daily Post. The Plan was distributed by mail and delivered to cities, non-profit organizations and county departments in Gwinnett County, consistent with the requirements of the Consolidated Plan regulations.

Printed copies of the plan were available, in Gwinnett County, for public review and comment at:

1. The Gwinnett Justice and Administration Center;
2. The Community Development Program Office;

To make the Proposed Unified Plan most accessible to citizens, the documents were also compiled in Adobe Acrobat® format and placed on the Gwinnett County Website [www.gwinnettcounty.com.]

A Public Hearing were held on the Proposed Unified Plan during the 30-day Public Comment Period as follows:

Public Hearing Location	Address	Date	Time
Gwinnett Justice and Administration Center 2nd Floor, Conference Center, Room C	75 Langley Drive, Lawrenceville, GA	October 21, 2008	6:00 PM

A summary of public comments received on the proposed Unified Plan follows:

October XX, 2008 Public Hearing – Gwinnett Justice and Administration Center, Lawrenceville

Insert Comments Here

In addition to comments received at the public hearing, the following comments were received on the Proposed Unified Plan by mail, by telephone or by facsimile transmission.

Insert Comments Here

COMMUNITY PROFILE

The Community Assessment Technical Addendum (Unified Plan Appendix A) provides a detailed profile of current conditions and trends in the county. The following maps supplement that analysis and illustrate the locational trends in the county's changing ethnic population. Also mapped are concentrations of low and moderate-income households.

Figure 1
1990-2000 Minority Population Net Change

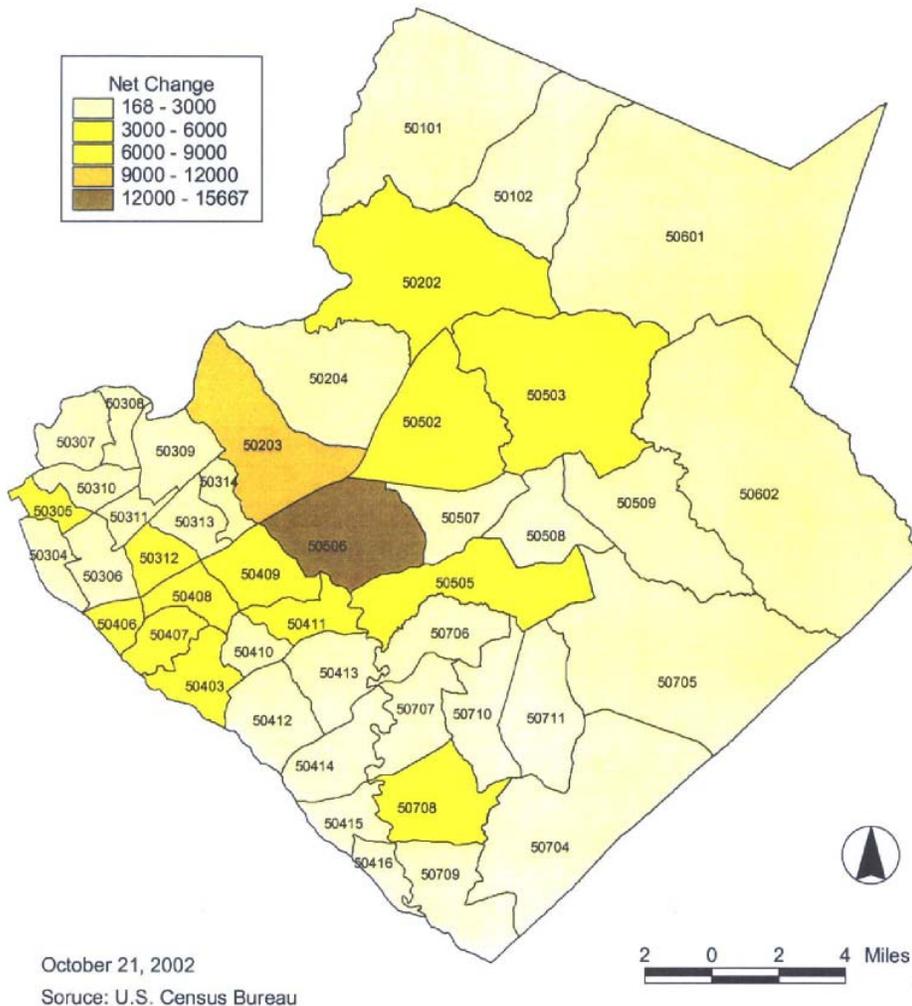


Figure 2 2000 Minority Population Proportion Of Total Population

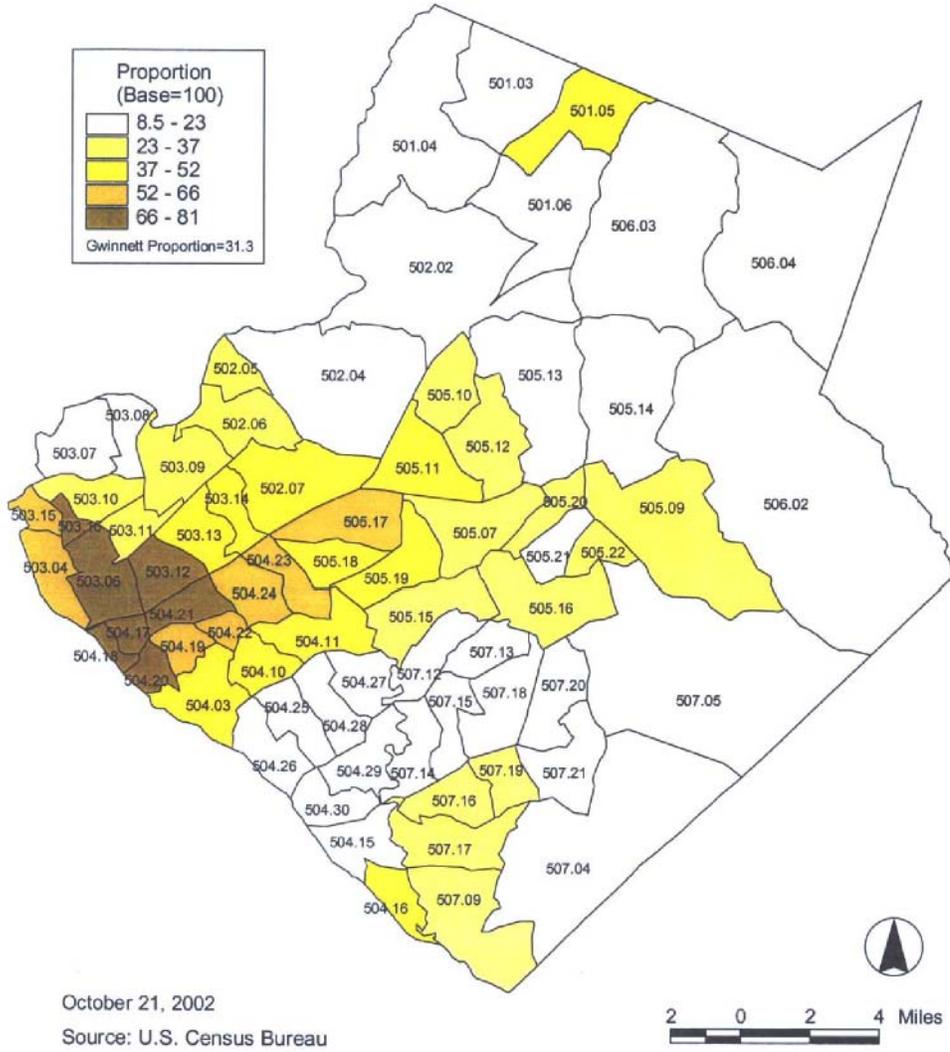


Figure 3

1990-2000 Net Change in Minority Population Proportion Of Total Population

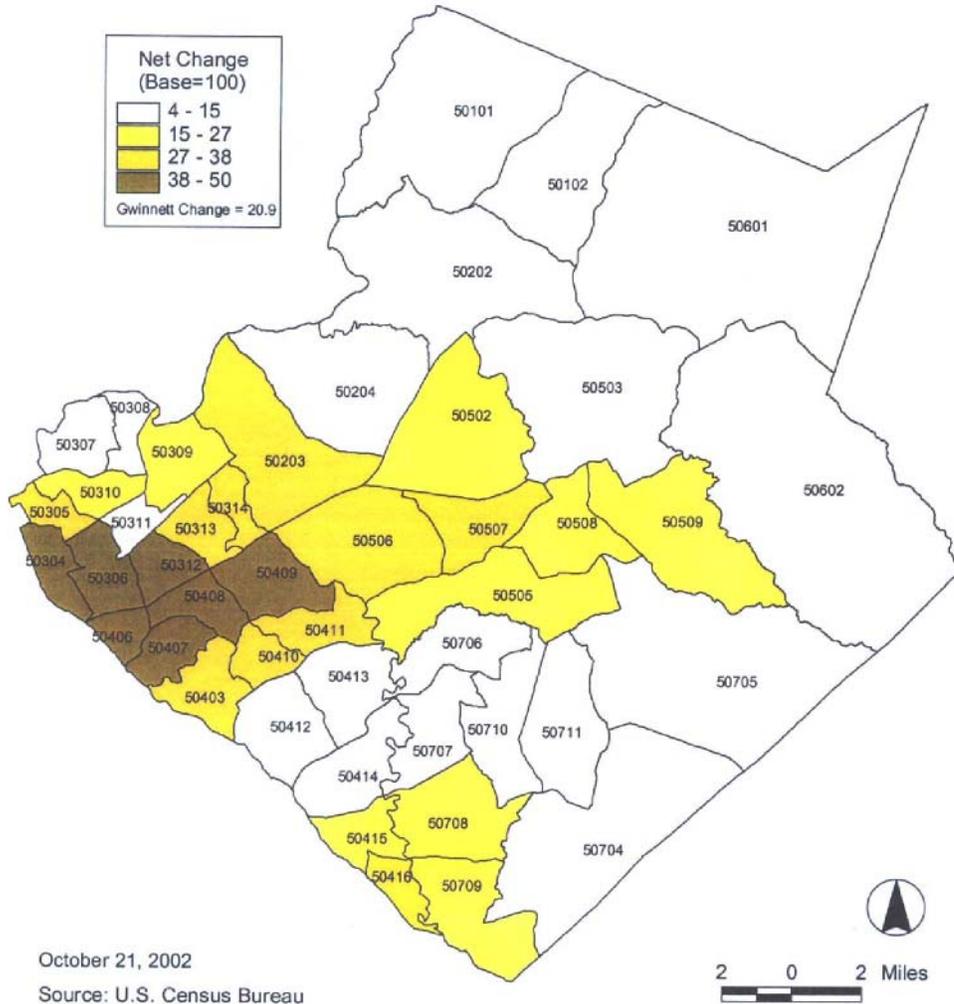


Figure 4
1990-2000 Black Population Net Change

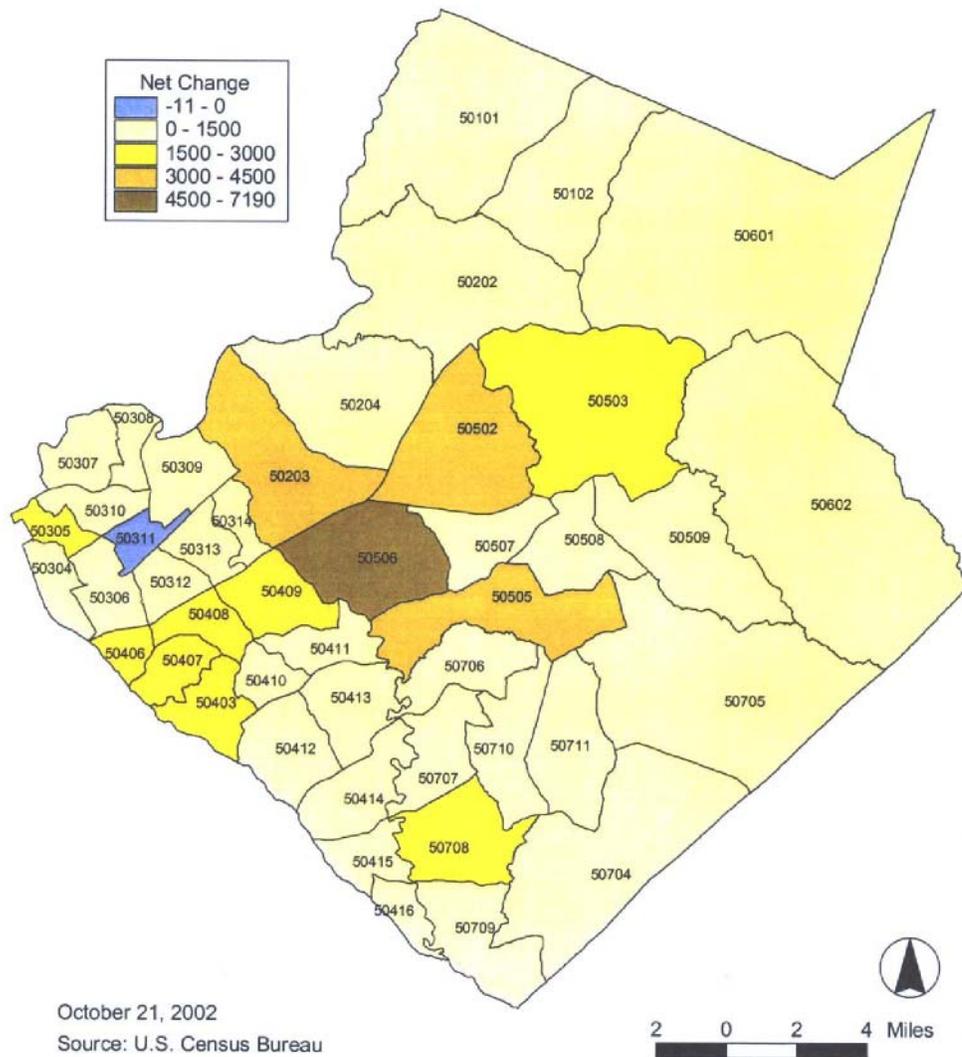


Figure 5
2000 Black Population Proportion Of Total Population

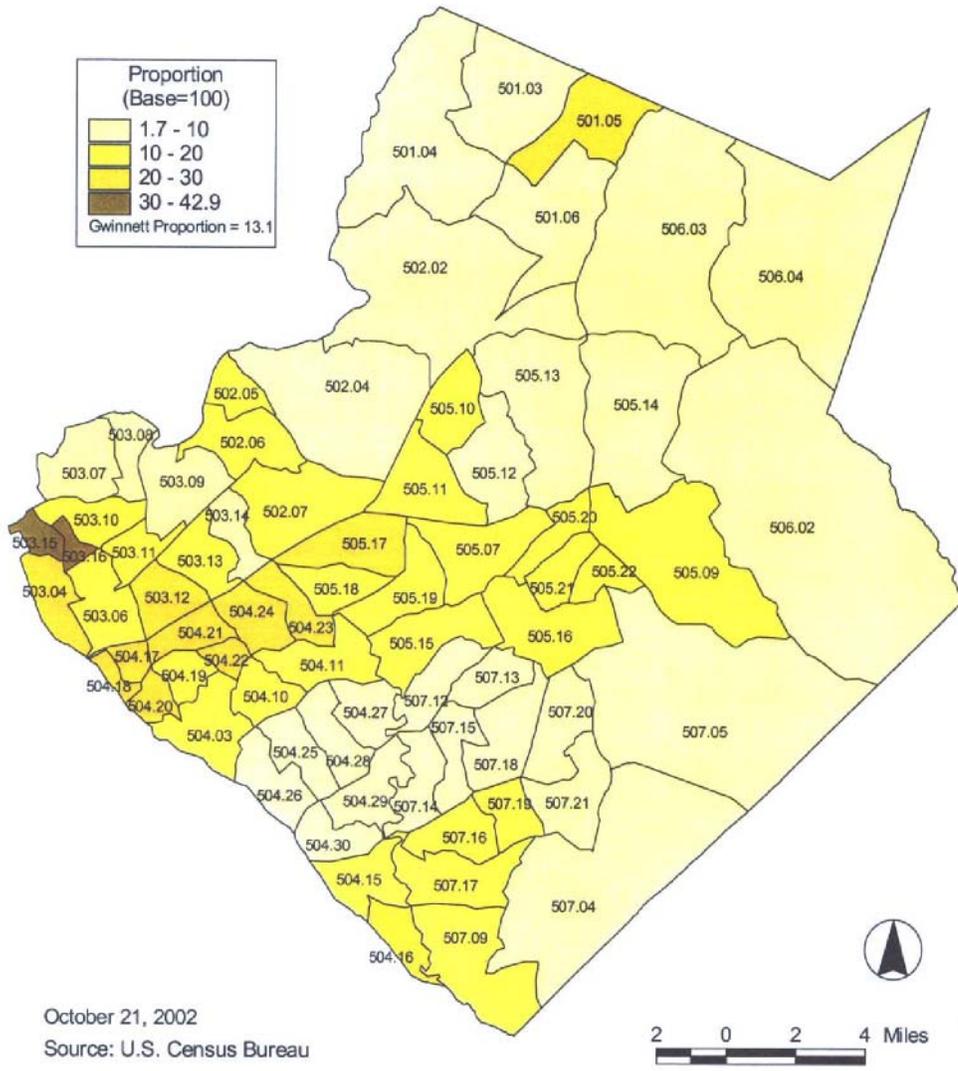


Figure 6
1990-2000 Hispanic Population Net Change

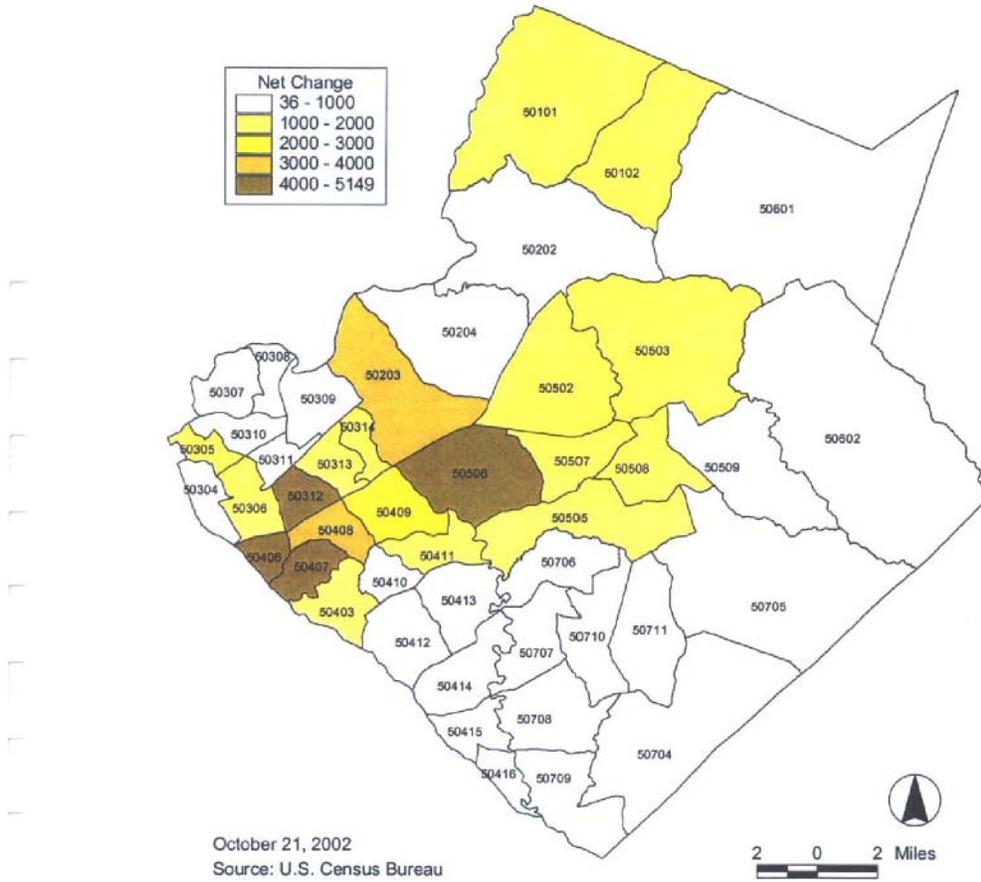


Figure 7
2000 Hispanic Population Proportion Of Total Population

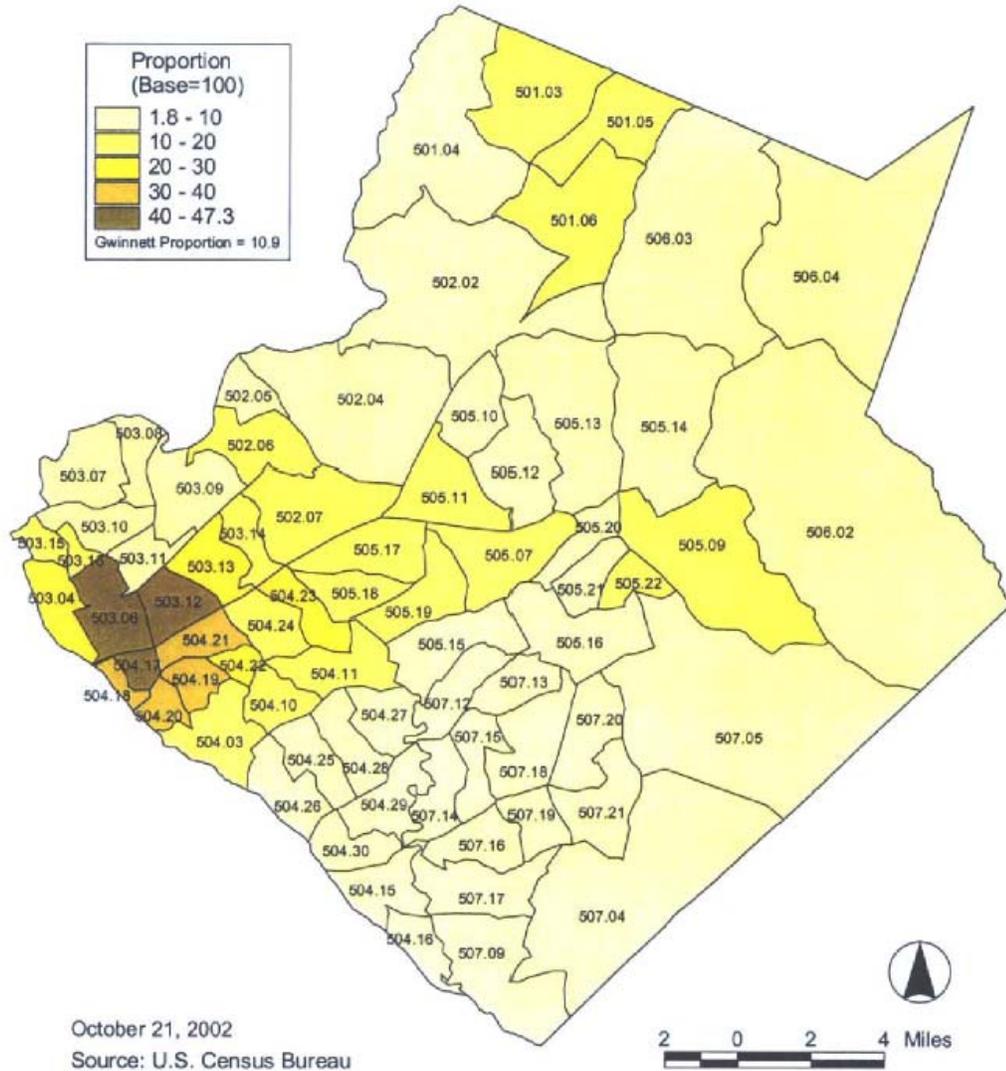


Figure 8
1990-2000 Asian/PI Population Net Change

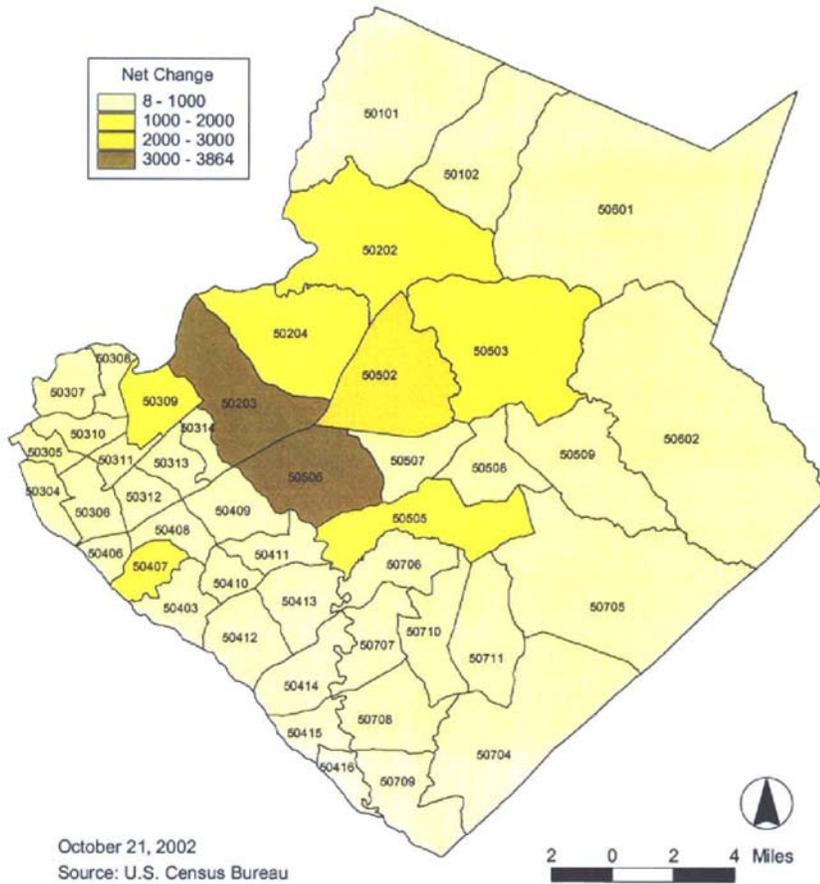


Figure 9
2000 Asian Population Proportion Of Total Population

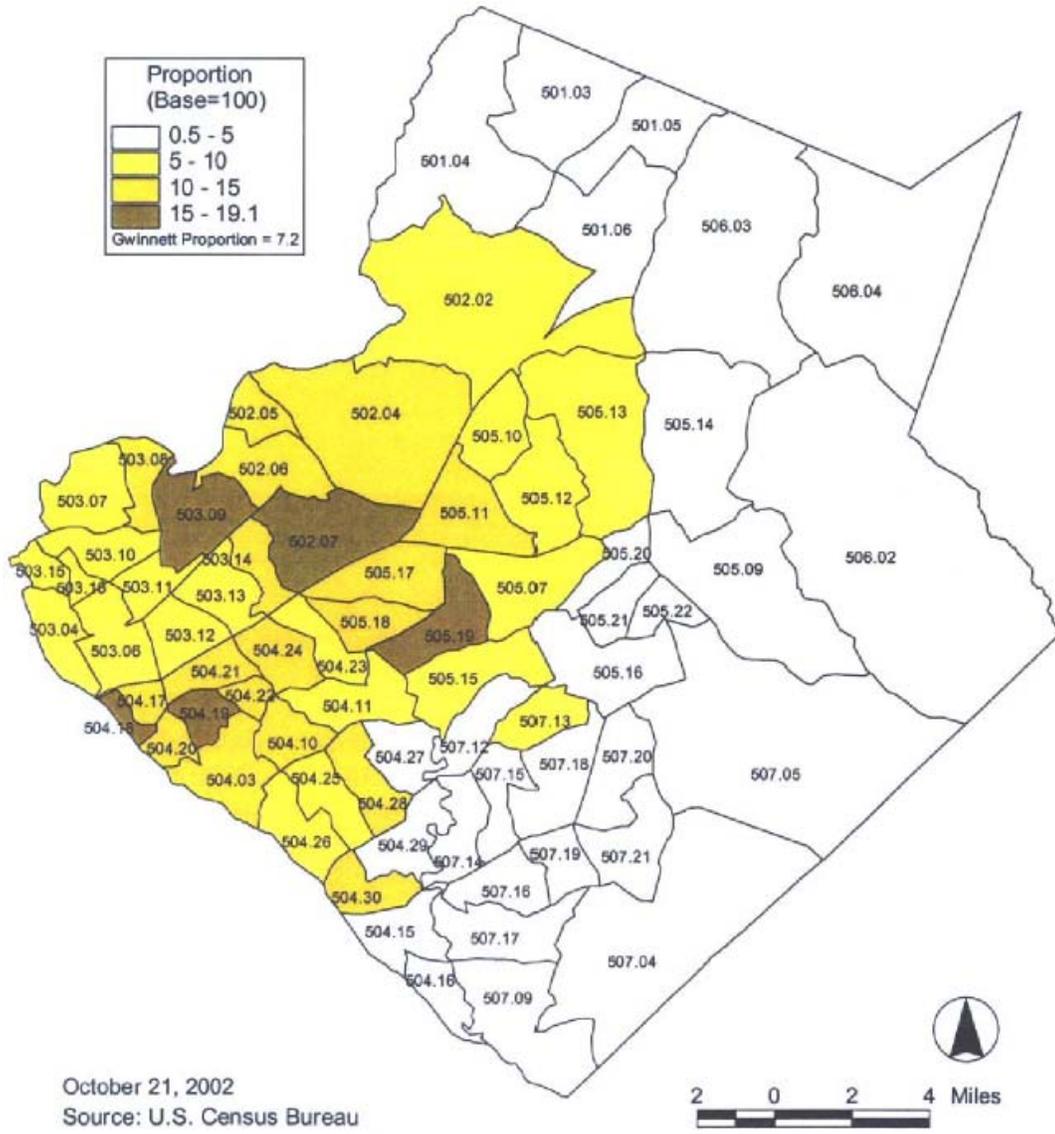


Figure 10
1990-2000 Non-Hispanic White Population Net Change

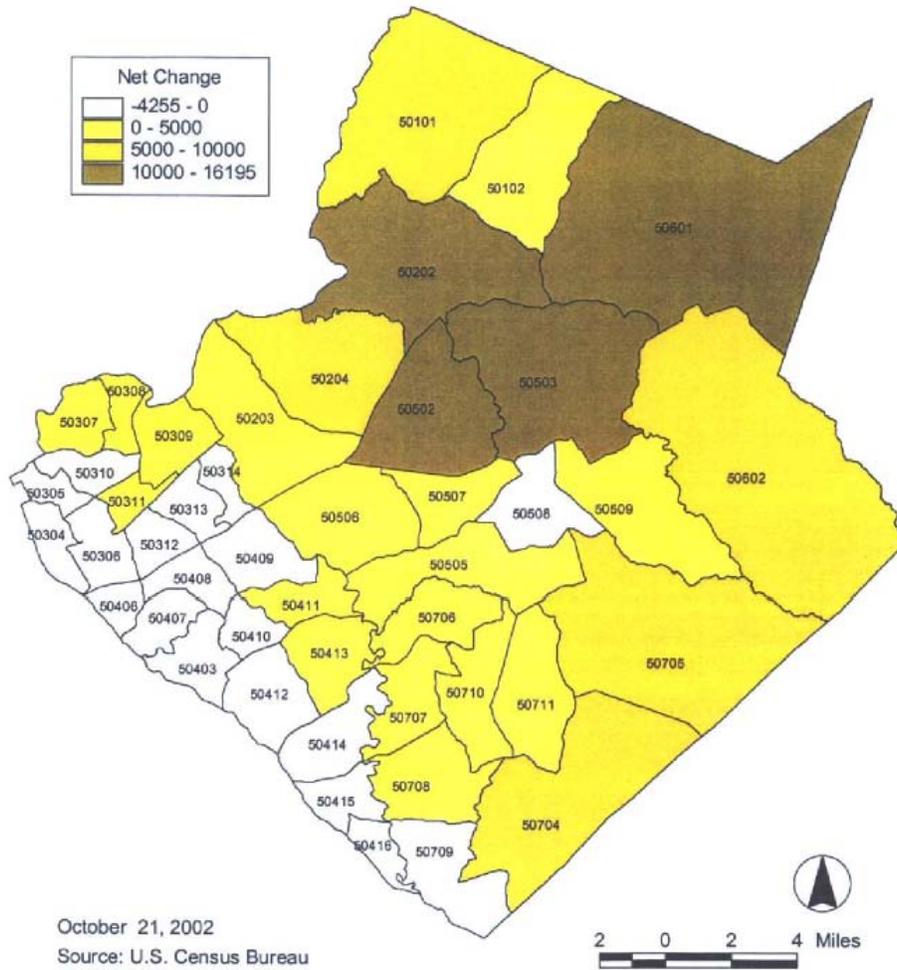


Figure 11
2000 Non-Hispanic White Population
Proportion Of Total Population

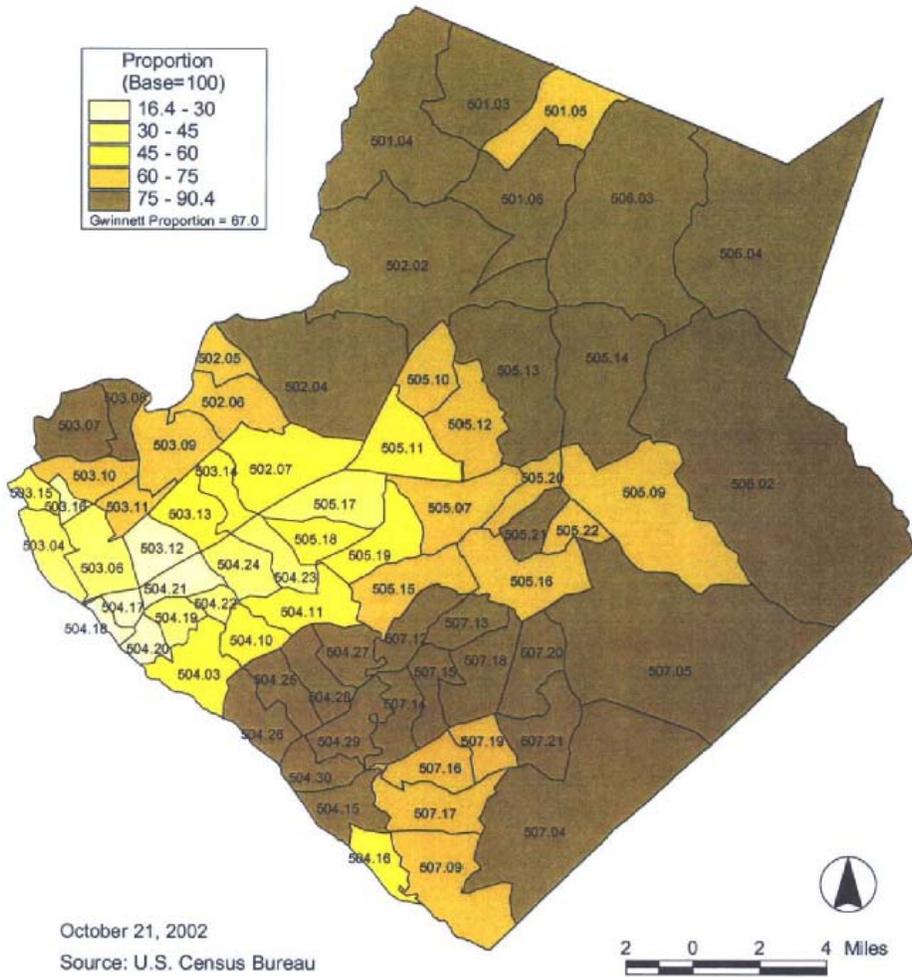


Figure 12

2000 Median Family Income

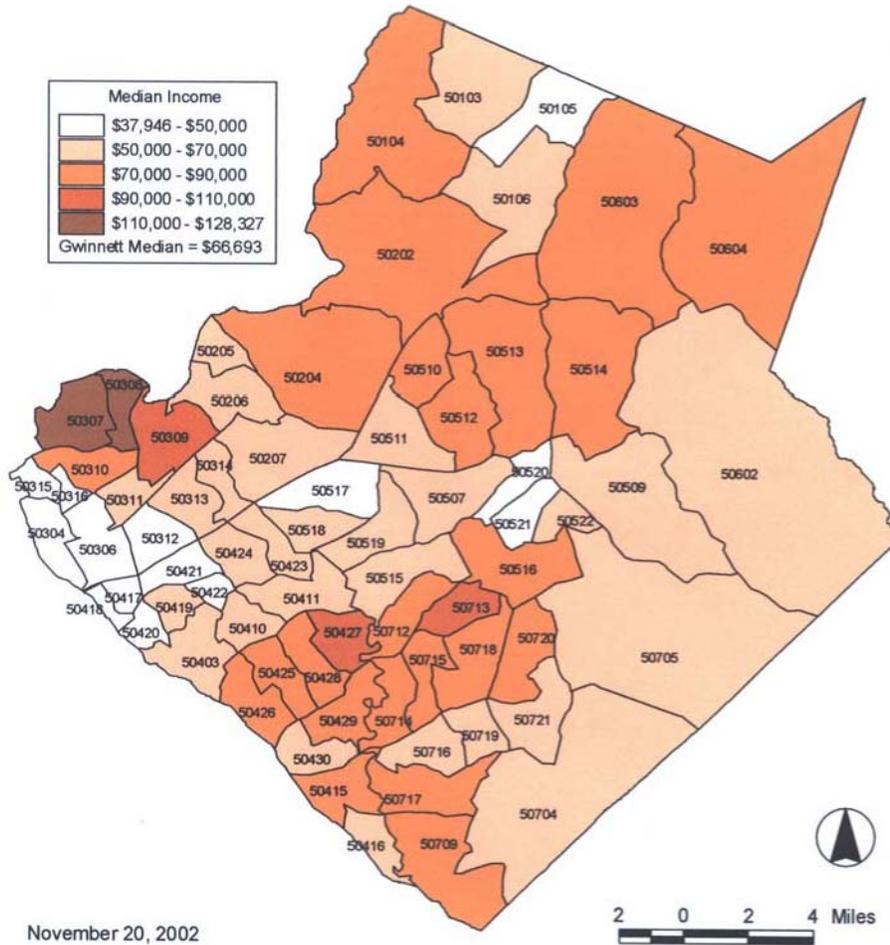


Figure 13

2000 Median Household Income

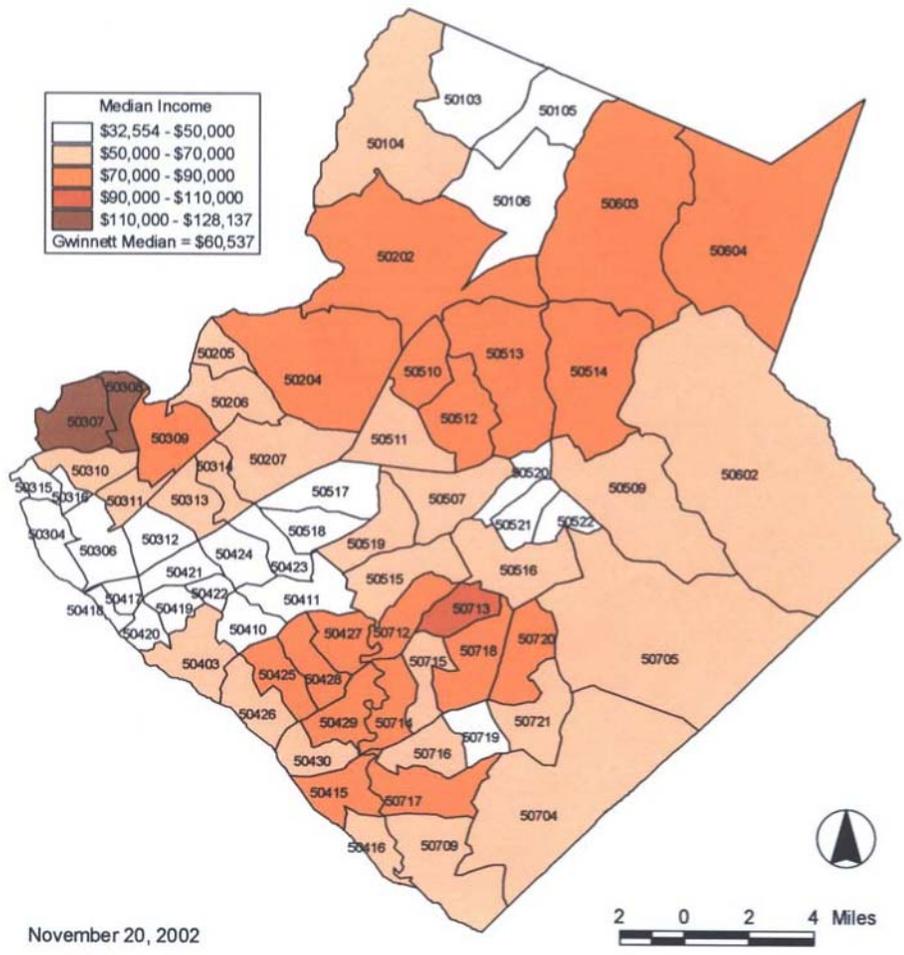
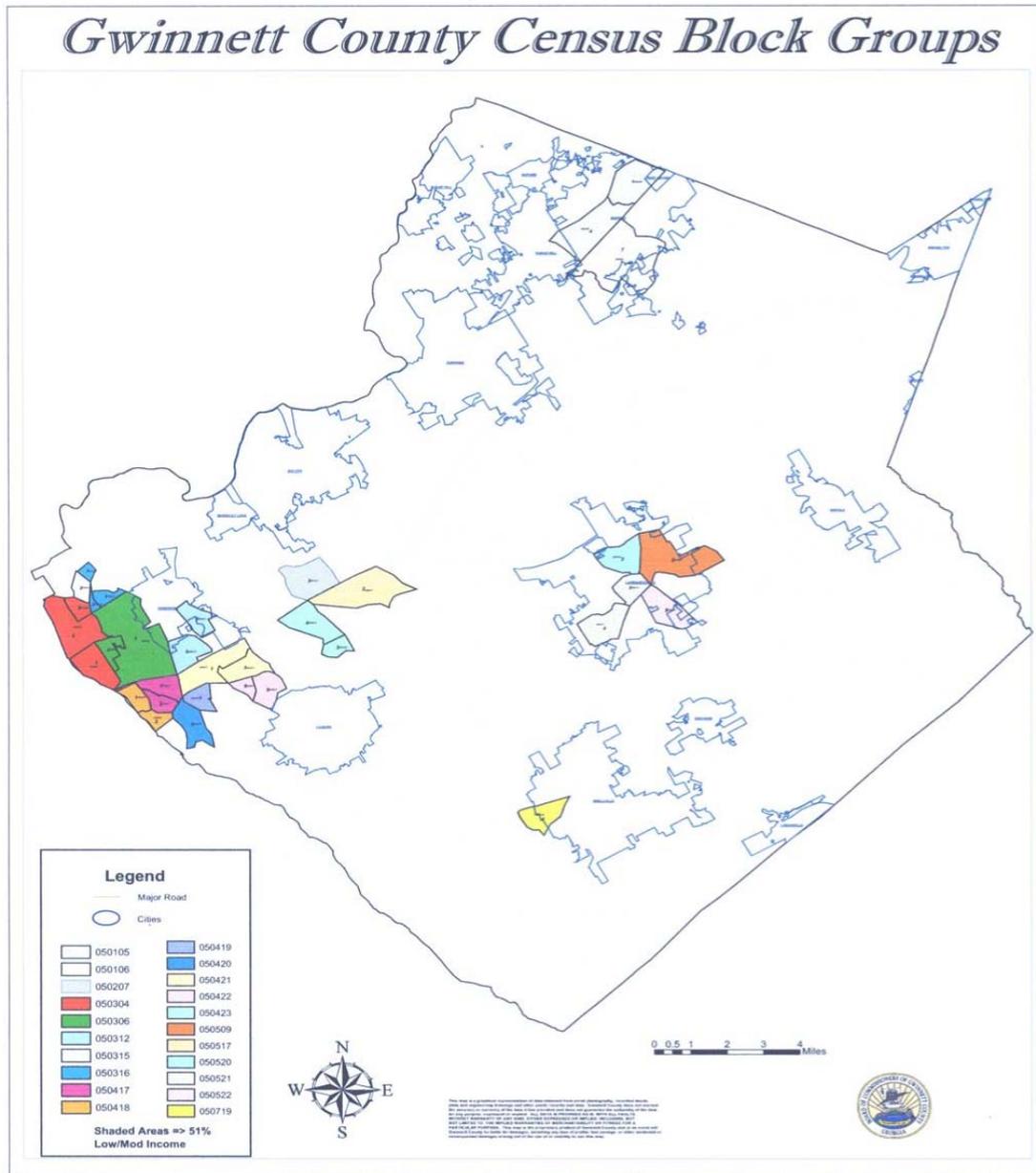


Figure 14
Census Block Groups
51% or More Low/Moderate Income



STRATEGIC PLAN

The strategic plan component of the Consolidated Plan contains three main elements [**homeless, housing, and community development**], which are the primary topics addressed by the Consolidated Plan. Each major component includes a presentation of data and data analysis, goals and priority objectives, needs, strategies and techniques, and resources. All activities for funding under the Consolidated Plan in the Action Plans for each of the years 2009-2013 address these goals and their respective priority objectives.

GOAL: HML Increase Housing Options for Homeless and Near-homeless Individuals and Families

HOMELESS

The homeless goal and priority objectives are presented, followed by a description of the the Continuum of Care model, including data addressing the needs of the homeless and near-homeless in Gwinnett County, resources available, gaps in the Continuum of Care, and strategies to close the gaps.

Priority Objectives:

- HML1** Support non-profit, private and public entities that provide housing opportunities for at-risk populations
- HML2** Address the emergency shelter needs of homeless persons, including individuals, families, adults, and youth
- HML3** Provide outreach to homeless persons for assessment of their individual needs
- HML4** Address the transitional housing needs of homeless persons, including individuals, families, adults, and youth
- HML5** Help homeless persons make the transition to permanent housing and independent living
- HML6** Help prevent homelessness of low-income individuals and families

CONTINUUM OF CARE

Description of the Continuum of Care

Gwinnett County relies on the Continuum of Care model as a tool for attacking and solving the problem of homelessness, as a participant in the State of Georgia Balance of State Continuum of Care administered by the Georgia Department of Community Affairs, which addresses all four components of the model:

1. Outreach and assessment to identify the needs of individuals and families and to connect them to facilities and services.
2. Emergency shelter as a safe, decent alternative to life on the streets of the community.
3. Transitional housing with various appropriate services.
4. Permanent housing or permanent supportive housing.

Process for Participation in the Georgia DCA Balance of State Continuum of Care

The continuing process of developing the Continuum of Care is closely tied to the Consolidated Plan process, having been developed within the strategies, goals and priority objectives of the Consolidated Plan. Likewise the Consolidated Plan reflects and contains the components of the Continuum of Care. The same process of data gathering/analysis and

"gap" identification occurs concurrently in Consolidated Plan and Continuum of Care and the results are shared and utilized in both of these interrelated community planning processes.

The Gwinnett Coalition for Health and Human Services (referred to hereinafter as the GCHHS or the Coalition), serves as the linkage among all the Gwinnett entities which serve homeless persons or near-homeless persons in need of various types of assistance. The GCHHS brings together all the public and private entities serving persons with housing, emergency assistance, physical health and mental health, and similar needs. The GCHHS provides a hotline for citizens through which they can obtain referrals to appropriate service providers.

The Coalition serves as the convenor for activities affecting housing and services for low income and homeless citizens. The Council works closely with Gwinnett County through the Consolidated Plan development process.

The Parties Involved in the Gwinnett County Continuum of Care Process

The Continuum of Care Strategy was developed using a collaborative roundtable approach by stakeholders who worked together for goal-setting, establishment of measurable objectives, and in the selection of priorities and projects. All participating member organizations have met and have agreed to abide by the consensus decision-making process of the Council.

Non-profit and government agencies which are providers of services to the homeless which participate and cooperate with the Coalition and/or participate by Gwinnett County agencies in the Georgia DCA Balance of State Continuum of Care:

The IMPACT! Group [formerly Gwinnett Housing Resource Partnership, Inc. (GHRP)]
Rainbow Village
Travelers Aid of Metropolitan Atlanta
Division of Health and Human Services, Gwinnett County Department of Community Services
Gwinnett County Department of Family and Children Services
Gwinnett/Rockdale/Newton (GRN) Community Service Board
Gwinnett County United Way
East Metro Health District/Gwinnett County Health Department
The Partnership for Community Action Latin American Association
Gwinnett County Community Development Program
Lawrenceville Housing Authority
Norcross Housing Authority
Lilburn Cooperative Ministries
Southeastern Gwinnett Cooperative Ministries Norcross Cooperative Ministries
North Gwinnett Cooperative Ministries Duluth Cooperative Ministries
Gwinnett County Habitat for Humanity Gwinnett County Police Department Gwinnett County Juvenile Court
Asian American Resource Center
Center for Pan Asian Community Services Georgia Department of Labor
Georgia Department of Community Affairs Salvation Army, Gwinnett
Distinguished Women With A Purpose Partnership Against Domestic Violence

Strategy or Vision To Combat Homelessness

Gwinnett's vision to combat homelessness requires that the root economic causes of homeless be addressed - **insufficient numbers of decent, safe, and sanitary low-cost housing units [limited housing stock] combined with limited financial capacity of homeless households (low wage jobs, depleted savings, excessive debt).**

The strategies to address the limited housing stock include:

- acquisition and rehabilitation of units for affordable rentals; and
- creative homeownership initiatives for low-income households.

Strategies for helping the homeless households include:

- self-sufficiency initiatives;
- supportive services;
- follow-up; and
- secure affordable permanent housing.

The strategy in Gwinnett County's mission to reduce homelessness:

- help each individual move toward the goal of self-sufficiency.

The overwhelming majority of homeless persons in Gwinnett County are single mothers with children, and the case management and supportive services network is geared primarily toward serving them.

The long-term goal of self-sufficiency requires:

- intensive counseling;
- job readiness and job training;
- child care;
- educational improvement;
- management of finances; and
- various health and mental health issues.

Breaking the cycle of homelessness for the long-term homeless can be a daunting task..but for the homeless mother and children, the hope is to rescue the children from a lifetime of homelessness by quick and effective intervention. Attention to details brings about results and can keep the family unit from becoming permanently "on the street."

The homeless often suffer from many problems, including:

- lack of proper nutrition;
- absence of preventative health care;
- lack of regular shelter;
- alcohol and/or drug abuse;
- mental illness; and
- other related difficulties.

Improvements in Intake/Client Processing

The focus of the Coalition has always been to move the person or family in need to the appropriate service(s). The approach also includes appropriate evaluation, assessment, and case management to deal with the underlying problems of the individual or family which has caused homelessness.

Gwinnett organizations are working under difficult conditions with rapid population growth bringing a corresponding growth in the numbers of homeless. Continuing improvements are being made in the process of bringing the homeless into the assessment/evaluation and case management system [HMIS] provided through PATHWAYS in Atlanta. Individual attention must be given to each client to ensure their needs are met.

One of the primary objectives of the coordinated approach followed by the GCHHS has been to simplify the process of accessing services by calling one telephone number (the Gwinnett Helpline) which helps the caller make contact with the correct service provider for that caller's specific needs.

Common intake/referral procedures for all clients, utilized by the Coalition, allow the citizen to focus on obtaining the appropriate assistance, rather than attempting to determine if they are calling the right organization for the help they need. The GCHHS citizen access process represents a logical method to connect citizen with service at a minimum loss

of efficiency, while reducing the "agency shuffle" and by maintaining personal dignity for every person accessing the service assistance network in Gwinnett County.

Inadequate Supply of Emergency Shelter

Homelessness and emergency shelters are issues that are more visible and apparent in urban settings than in suburban ones such as Gwinnett. However, analysis by the Coalition and the Gwinnett County Community Development Program point to a growing problem of poverty and homelessness in the County. At this time, there is no designated organization which has agreed to provide more shelter for the homeless population. Gwinnett County and the Coalition are continuing their focus special on this issue during this Plan period (2009-2013).

Only one general emergency shelter operates in the County: the Quinn House, a privately funded and operated facility serving approximately 20 families per year. A few nonprofit organizations provide shelter for battered women, children, and adults. In addition, a few local churches assist with emergency housing needs through shelters and sponsorship of needy families. Most homeless families are housed in "extended stay" economy motels with funding provided by Gwinnett County's Emergency Shelter Grants Program and by the Georgia Department of Community Affairs [ESG and State Housing Trust Fund monies]. Unfortunately, there are no other general emergency shelters for families or individuals who have lost their housing due to economic or physical disaster. The existing shelter services do not meet the growing demand for emergency shelter in Gwinnett County, and the possibility exists that the primary shelter resource – the extended stay motels – may not remain a long-term solution.

During the 2003 -2005, Gwinnett County and the Coalition requested and received approval from the Salvation Army for the preparation of a feasibility study for that organization to possibly construct and/or operate a homeless shelter in Gwinnett County. At the time this Plan was being developed, the study was complete but no decision had been made by the Salvation Army in response to the feasibility study recommendation that a shelter should be built. Gwinnett County and the Coalition will continue to encourage the Salvation Army to build and operate a homeless shelter in Gwinnett County. Gwinnett County will encourage the Salvation Army to request CDBG funds to assist with acquisition/rehabilitation or construction costs for the shelter.

Inadequate Supply of Transitional Housing

Twenty-seven (27) units of general purpose transitional housing exist in Gwinnett County. The enclosed gap analysis [Table 1 – HUD Table 1A] demonstrates the need for more transitional housing. This need must continue to receive attention and investment. Gwinnett County plans to continue to appropriate CDBG and HOME funds for this purpose during this Plan period when eligible and fundable projects are selected through the County's annual competitive application processes.

Inadequate Supply of Permanent Affordable Housing

The rapid population growth in Gwinnett County has attracted housing developers, but primarily in the upper income market. Limited numbers of new affordable multi-family housing is being constructed and no housing has been constructed recently for use as emergency shelter, transitional housing, or permanent housing for the homeless. Additional permanent housing is needed at a price affordable to persons who may be moving from transitional housing.

Limited Access to Public Transportation

One of the major obstacles for homeless persons in Gwinnett County is the limited availability of public transportation. The County initiated the operation of its public transit system in November 2000. The system consists commuter service to Atlanta, local route services, and para-transit service. The access to a public transportation system will permit persons who are homeless or at-risk of becoming homeless to travel to jobs or job training, thus moving toward self-sufficiency. Many of the supportive service providers included in the Gwinnett County Continuum of Care, and listed in this application, provide transportation to their clients.

Gwinnett County has experienced rapid population growth since 1970. Future growth projections will bring additional citizens without homes and without sufficient job skills to obtain employment quickly. Such growth brings demands for services which are typically created by low-wage workers. From its 1970 population of 72,349, Gwinnett County has now grown to 588,488 persons, as reported in Census 2000. Populations which continue to increase, bringing citizens at all levels of income to a Gwinnett. The community should and must provide appropriate services for all citizens. The objective of the GCHHS Coalition is to provide a community-based/community-wide mechanism to reach all the citizens and to provide them a "one-stop-shop" for referral to all service-providers. Gwinnett County, like many communities, is challenged to identify the exact population count of homeless persons. However, through the use of data maintained by the Coalition and its member agencies, the most current information has been compiled in the "Needs-Inventory-Gaps" analysis.

Table 1 (HUD Table 1A)

**Homeless and Special Needs Populations
Continuum of Care: Housing Gap Analysis Chart**

		Current Inventory	Under Development	Unmet Need/ Gap
Individuals				
Beds	Emergency Shelter	295	0	705
	Transitional Housing	255	0	345
	Permanent Supportive Housing	0	0	25
	Total	550	0	1075
Persons in Families With Children				
Beds	Emergency Shelter	615	0	698
	Transitional Housing	130	0	257
	Permanent Supportive Housing	0	0	50
	Total	745	0	1005

Continuum of Care: Homeless Population and Subpopulations Chart

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households)	500	200	500	1200
1. Number of Persons in Families with Children	2000	200	3000	5200
2. Number of Single Individuals and Persons in Households without Children	2000	200	1200	3400
Total (lines 1 + 2a)	4500	600	4700	9800
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
1. Chronically Homeless		700	500	1200
2. Seriously Mentally Ill		50		
3. Chronic Substance Abuse		50		
4. Veterans		125		
5. Persons with HIV/AIDS		50		
6. Victims of Domestic Violence		2500		
7. Unaccompanied Youth (Under 18)		2000		

The data in Gwinnett County are consistent with surveys conducted in other communities. Needs far exceed resources, and it is difficult to decide where to invest scarce funds when needs are so great throughout the Continuum of Care, from emergency shelter to permanent housing for the homeless. In Gwinnett County, factors which are causal or contributory toward homelessness include transient living lifestyle, marital problems and domestic violence, mental illness, physical disabilities, no employment, inadequate or no child care, absence of available affordable transportation, and substance abuse and addiction. In many instances, the same individual may be suffering from a number of causal factors which result in short-term or long-term homelessness.

Gwinnett County has structured its services to the homeless around the Coalition HELPLINE and referral service to get the individual into the case management system. Once a person has accessed the system, appropriate agencies perform intake and begin the evaluation and referral process to help the homeless person access the services appropriate for the need(s).

Fundamental Components of the Continuum of Care Currently in Place

The fundamental components of the Continuum of Care are already in place, including:

1. Outreach to homeless and near-homeless individuals and families, combined with a comprehensive intake, assessment, and referral system.

Common intake/referral procedures for all clients, utilized by the Coalition and its member organizations, allow the citizen to focus on obtaining the appropriate assistance, rather than attempting to determine if they are calling the right organization for the help they need. The GCHHS citizen access process represents a logical method to connect the citizen with services with a minimum loss of efficiency, while reducing the "agency shuffle" and by maintaining personal dignity for every person accessing the service assistance network in Gwinnett County.

2. Emergency Shelter as a safe, decent alternative to life on the streets. The Partnership Against Domestic Violence has a 32 bed facility for women and children fleeing domestic violence. The IMPACT! Group [formerly Gwinnett Housing Resource Partnership [GHRP] uses local budget-priced motels to provide shelter for homeless families, elderly, or disabled. Travelers Aid of Metro Atlanta uses local low-cost motels for newcomers who are homeless.
3. Permanent Transitional Housing with Supportive Services is provided by The IMPACT! Group [12 units], Rainbow Village (14 units), and Travelers Aid (1 unit). All twenty-seven (27) units serve families with children. The GRN Community Service Board leases apartments of various sizes for residential use by persons with mental illness, substance abuse, and disabilities. Two additional organizations [Asian-American Resource Center – 4 units; Distinguished Women With a Purpose – 4 units] are now utilizing HUD Supportive Housing Program grant funds to lease transitional housing units.
4. Permanent housing or permanent supportive housing is provided by The IMPACT! Group, which owns and operates more than 250 low cost rental units for low income families. GHRP also maintains a list of apartments which are "more affordable" and refers clients to facilitate placement.
5. Follow-up with families is performed by each of the housing-related agencies (The IMPACT! Group, Rainbow Village, Travelers Aid, Partnership Against Domestic Violence, and GRN Community Service Board), once the families secure permanent housing. This includes tracking their progress and offers additional support or referrals, when needed.

With these components in place, the Gwinnett County partners seek to expand the capacity and resources of this system to meet the growing demand. The areas of focus in the SHP proposal are the actual transitional housing units and funding for essential supportive services for transitional housing residents.

How Homeless Persons Receive or Access Assistance

Clients access the homeless assistance network by contacting the Gwinnett Helpline, operated by the Gwinnett Health and Human Services Coalition. Referrals are made from the Helpline to the appropriate provider of services, client intake is performed by the Department of Family and Children Services, case management by the Partnership for Community Action, housing placement by The IMPACT! Group, mental health services or substance abuse problems by the GRN Community Services Board, physical health services by the Gwinnett County Board of Health, and Travelers Aid for new arrival assistance. The Coalition is the coordinating entity which oversees the participation of organization serving the homeless in Gwinnett County in the Georgia DCA Balance of State Continuum of Care in Gwinnett County, in cooperation with its member agencies and organizations.

If homeless individuals or families contact a participating agency or organization of the Coalition directly, without using the HELPLINE, staff assist the person access the homeless assistance system by obtaining intake, case management, and the appropriate service or services for the individual or family.

How Each Subpopulation Is Reached or Will Be Reached

Subpopulations of homeless persons [veterans, persons with mental illness, substance abuse, or HIV/AIDS] represent a very small part of the Gwinnett County homeless problem. The predominant homeless population in Gwinnett County is families, mostly headed by a single- parent, usually female. Although Gwinnett's homeless population is predominantly families, the Continuum of Care network has been structured to respond to the needs of all the homeless.

Veterans

Veterans are currently receiving priority assistance through the Georgia DCA Balance of State Continuum of Care. Among local service providers, housing, supportive services and case management are not provided to veterans as a specific subpopulation at the current time. Problems are dealt with, but a person's status as a veteran is not the primary issue in assisting a homeless person. It should be noted that the largest number veterans who are homeless are served by the GRN Community Service Board in Gwinnett County.

Persons with Mental Illness or Substance Abuse

The Gwinnett/Rockdale/Newton (GRN) Community Service Board provides comprehensive mental health and substance abuse services to all citizens of Gwinnett County. Housing for persons with such conditions is provided by the GRN, using leased facilities.

The agency has been serving the homeless mentally ill and substance abuse populations since 1973. Service delivery, including housing, began in 1981. The GRN Housing activities include residential services for this special population through family care homes, halfway houses, self-help placements and emergency homes.

The GRN currently offers an array of housing services which includes structured 24 hours/day care to individuals in transitional housing. GRN provides 24-hour group home services to adult individuals diagnosed with chronic mental illnesses in different Adaptive Group Residences in Gwinnett County. Along with group home services, GRN leases apartments to house clients who are suited to supportive independent living. The GRN staff provide on-site support to the individuals in 24 hour group home living and in 24 hour supervised care. Daily or weekly supervision and services is provided to those in semi-independent apartments.

Along with community housing services, GRN provides 24 hour-per-day crisis intervention, case management services, psychosocial rehabilitation, mental health inpatient and outpatient services, partial hospitalization, employment services, clinical evaluation/assessments and a variety of alcohol and other drug services.

The GRN receives referrals from a number of agencies and individuals within Gwinnett County. GRN provides services to Gwinnett County residents who meet specific criteria for services [major mental illness or substance abuse diagnosis] and are homeless, indigent, or have very low incomes. Under the Continuum of Care process in Gwinnett County, GRN will continue to receive referrals from all participating agencies.

Persons with AIDS/HIV

AID Gwinnett, Inc. was created in 1991 to provide services to individuals with AIDS/HIV and to their families and friends. Using current national statistics, one (1) in every two hundred fifty (250) persons is HIV-positive. When applying the national statistics to Gwinnett County, the estimated number of HIV-positive persons in Gwinnett County is 1,800.

Since 1992, AID Gwinnett, Inc. (AGI) has been the recipient of funds from the HUD HOP WA (Housing Opportunities for Persons With AIDS) Program administered by the City of Atlanta since 1993. Services provided by AGI include counseling, case management, transportation, medical services, and most importantly -- housing. HOPWA funds are

utilized by AGI to help prevent persons with AIDS/HIV from becoming homeless by paying rent or mortgage payments when the AIDS client is unable to work and provide their own funds to obtain housing.

Currently, Gwinnett County has no specific housing facility for persons with AID/HIV, and provides housing assistance funds to persons with AIDS/HIV. It is likely that any permanent housing is provided in the future for these clients will be provided on a scattered-site basis to preserve the privacy of persons living with AIDS/HIV. However, additional resources are needed to assist such persons with housing costs.

If a homeless client accesses the HELPLINE or requests assistance from another service delivery or housing agency and the client indicates that AIDS/HIV is a primary causal factor in their homelessness, all agencies refer the clients to AID Gwinnett, Inc., if the client wishes to receive services and assistance from AGI. The collaborative connection in Gwinnett County is utilized to assist homeless persons with AIDS/HIV as well as other homeless individuals and families.

Needs of Persons Threatened with Homelessness

As reported in the 2000 Census, Gwinnett has 11,428 households in the 0 to 30% of Median Family Income (MFI) category, and 13,923 households in the 31 to 50% of MFI category. Of the 25,351 households in the 0%-50% MFI, 16,604 are renters who are the most likely to become homeless. Of the total 16,604 renters, 39% (6,490 households) have a cost burden of 50% or more of their income for rent. Most of these families are one or two paychecks away from being homeless.

In general, the homeless state of an individual or family is a direct result of other needs of that household. A strong response to the homeless problem must address the wide range of needs of the people who are homeless. A case management approach to homelessness addresses the following needs, in addition to emergency shelter: food, health care, child care, transportation, and employment, and permanent housing.

Many low-income persons need supportive services to help them remain in their current housing -- i.e., emergency grants for rent/utility assistance. Affordable health care is also important -- one illness can cause financial disaster for an individual or a family. Illness can lead to job loss, and high medical bills -- a combination which can bankrupt an already low-income household.

How the Continuum of Care Facilitates Movement of Homeless Among Components

The Georgia Balance of State Continuum of Care in Gwinnett relies on the Coalition as the essential linkage among all the parts of the system. All first contacts, referrals and follow up come through the Coalition system of coordinated service delivery. The Coalition serves as the communication vehicle to ensure that appropriate services are delivered and that subsequent referrals to other necessary services occur. The Coalition links the agencies and organizations who deliver services to the homeless. The procedures for client intake, assessment, and evaluation are standardized and may begin with a contact to the HELPLINE by a homeless person, or a referral from a private or public entity. The IMPACT! Group is the key member of the Council, acting as the primary service delivery organization for the Emergency Shelter Grant program. The IMPACT! Group is the owner-operator of two hundred fifty (250) units of transitional housing and affordable rental housing apartment housing.

Gwinnett County's "Needs Minus Inventory Equals Gaps" Analysis

The Gwinnett County Health and Human Services Coalition identifies the limited quantity of Emergency Shelter facilities as being the highest need (gap) among homeless activities, followed by the need for additional transitional housing. This relationship has been confirmed each year of this Plan period through an informal survey of providers of homeless housing and services. The most recent survey was performed during January 2004, and is presented in **Table 16**. The Gaps Analysis survey revealed that service demands of homeless individuals and families exceeded available supply for child care, case management, job training, chronic substance abusers, and victims of domestic violence. These survey results, along with other input from the participants, were used to complete the "Needs-Inventory-

Gaps" analysis.

The data demonstrate the inadequate supply of all three types of housing which constitute the housing stock resources of the Georgia Balance of State Continuum of Care in Gwinnett County. Clearly, additional housing units [emergency shelter, transitional housing, permanent supportive housing, and permanent housing] and bed spaces must be made available in Gwinnett County to homeless persons and families

ANALYSIS/STRATEGIES

HOMELESS NEEDS

The nature and extent of homeless needs is described here. The different categories of homeless needs are assessed.

1. Needs of Sheltered and Unsheltered Homeless

Homelessness continues to increase in Gwinnett County, particularly among families with female-heads-of-households. The Gwinnett Children's Shelter provides shelter and assistance to abused/neglected children. The Battered Women's Shelter (Partnership Against Domestic Violence) serves children whose mothers take them out of violent family situations. However, the largest proportion of homeless persons who need housing in Gwinnett County are women and children who do not needed the services of either of these organizations.

The experience of social service agencies in Gwinnett County, and an analysis of the many identified problems, strongly indicates the need for a comprehensive approach when dealing with the homeless. Seldom is there a single problem which, when resolved, will solve the problem of homelessness for an individual or family. Gwinnett's experience indicates that in order to move a family out of its homeless condition into a more stable and permanent setting, a comprehensive array of services is usually required.

In most situations, a combination of circumstances has led to homelessness, or has left a family or individual poised on the brink of being homeless. Such people need coordinated help in the form of referrals for training and jobs, access to health care and personal counseling, as well as assistance with finding affordable housing.

2. Subpopulations

Gwinnett County has the same challenge as many communities in calculating accurate statistics on the actual numbers of subpopulations among the homeless. It is known that homeless women with children are the largest group of homeless in Gwinnett and that their numbers are increasing often due to job loss, housing displacement, family dissolution, or domestic violence.

Several groups within the homeless population have special needs:

1. Individuals (women/men);
2. Families with children;
3. Persons with physical disabilities;
4. Elderly persons;
5. Mentally/emotionally disabled and persons with substance abuse problems;
6. Veterans.

Because of the nature of the problem there are few statistics available to determine how large the need is for shelters. A study prepared for the Gwinnett County Coalition for Health and Human Services entitled, "Human Services Needs in Gwinnett County, Georgia: Assessment and Recommendations," estimated that 3.2% of the population in the average southern county in a given year will require emergency financial assistance, 60% of which will require help only one time in order to solve its financial crisis. This would indicate that approximately 22,000 people or 7,800 households in Gwinnett require some emergency assistance.

While there is no precise statistical information available, several agencies and nonprofits indicated that the fastest growing homeless population is families with children, including single parent families. In addition to the increasing demand from this group, their needs are exacerbated by the lack of shelter accommodations for families. Most shelter facilities are equipped to handle individual adults or children, and friends or relatives often cannot accommodate a large group for temporary shelter.

The ever-shifting population of the homeless makes precise statistical information hard to obtain. Transients move on, people become unemployed, buildings are uninhabitable, families are evicted and/or overcrowded -- thus, any statistics are only a rough estimate. Yet, it is clear that the numbers of homeless are increasing. Most urban areas report a similar inability to meet the need for emergency services.

The data on in Gwinnett County indicates a much greater number of homeless people in Gwinnett County who are unsheltered than sheltered. Unfortunately, the **Table 1** data is "point-in-time" information, and does not reflect the totality of the homeless problem over time. It is safe to project that the "gaps analysis" data is incomplete and understated for the year 2005. It is anticipated that the HMIS system may make collection and analysis of data more complete and accurate, thereby assisting in a more thorough picture of homelessness in Gwinnett.

3. Types of Housing Needed to Serve the Homeless

Under the Georgia Balance of State Continuum of Care in Gwinnett, three basic types of housing are needed to serve the homeless:

- A. Emergency Shelter - providing short-term shelter (usually several weeks) while a crisis situation is being resolved.
- B. Transitional Housing - providing a setting in which a family, or individual, can resolve problems that require more time, such as obtaining job training, ending drug abuse, or recovering from a large financial loss or health problem. This usually requires from 3-24 months, dependent on the ability of the homeless individual or family to progress and approach self-sufficiency.
- C. Permanent Housing - providing long-term, affordable housing, either ownership or rental.

A broad spectrum of affordable housing is needed -- one which provides small steps for people to take -- for those who are able to move from emergency shelters into housing which affords privacy and reflects the movement from dependency into self-sufficiency.

A large number of the homeless will need to move from a shelter or a transitional housing setting into assisted housing for a period of a few months to several years. Some may require assisted housing indefinitely. Group homes, which would be a solution for some of these individuals, are often ruled out by zoning regulations and often are opposed by nearby property owners or neighborhood groups. Single Room Occupancy [SRO] units, such as those found in older hotels and boarding houses, are no longer as common as in previous years. Although some recent successes have slowed the losses of such units, over 2,000 SRO units have been lost in the Atlanta area since 1970.

Resolving the problems of the homeless will require that each of these categories be addressed in a coordinated manner. A Massachusetts Association for Mental Health report, An Integrated Approach, states that "homelessness is a problem of such massive proportions and astonishing complexities that only a course of action which integrates all forces and resources at hand--public, private, government and provider--can begin to address the needs of people with no place to be."

4. Homeless Facilities

Homeless facilities provide a housing mechanism with facilities and services that meet the emergency shelter, transitional housing, permanent supportive housing, and permanent housing needs of homeless persons within the

jurisdiction.

A. Inventory of Facilities and Services for the Homeless and Persons Threatened with Homelessness

Gwinnett County has only one privately-operated emergency shelter and a few nonprofit organizations that provide shelter to a limited number of battered women, children and adults. Unfortunately, there are no other general emergency shelters for families or individuals who have lost their housing due to economic or physical disaster. To respond to this need, The IMPACT! Group operates an emergency shelter program in partnership with local hotels and motels, the other agencies serving the homeless population. The IMPACT! Group coordinates the delivery of shelter, services, and prevention activities using ESG grant funds provided by Gwinnett County and ESG and State Housing Trust Fund monies from Georgia DCA.

Rainbow Village owns/operates 14 units of shelter for homeless individuals and families using ESG funds from Gwinnett County and ESG and State Housing Trust Fund monies from Georgia DCA.

The Partnership Against Domestic Violence operates the shelter for abused women and their children in Gwinnett County, and receives ESG funds from Gwinnett County and ESG and State Housing Trust Fund monies from Georgia DCA.

The ESG Program has outstanding cooperation from the Health and Human Services Coalition, the Department of Family and Children's Services (DFCS), the Partnership for Community Action, the County's Cooperative Ministries, the Salvation Army, Travelers Aid, the Partnership Against Domestic Violence, Rainbow Village, and other public and private organizations and agencies.

Two other nonprofits serve targeted groups for emergency and transitional shelter -- the Partnership Against Domestic Violence (PADV) and the Gwinnett Children's Shelter. The PADV provides some emergency and transitional housing for women, and women with children, who are escaping domestic violence. The Children's Shelter provides some emergency and transitional housing for children and teens who are awaiting foster care or permanent placement.

Transitional housing in Gwinnett County (35 units) is provided by The IMPACT! Group, which has twelve (12) units, by Rainbow Village, with fourteen (14) units, one (1) unit owned/operated by Travelers Aid, and four units each leased by the Asian-American Resource Center and Distinguished Women With a Purpose. These organizations provide transitional shelter to families and/or to women with children.

B. Gaps in Homeless Facilities and Services

The County has identified the following major gaps in homeless facilities and services.

- (1) Emergency Shelter: Estimates of the homeless in Gwinnett range from 1,200 to 5,000 individuals per year. Using even the most conservative estimate, it is obvious that many more than the current 295 shelter beds are needed. There is, also, no place for the homeless to go during the day--particularly those who are ill, or those who are not able to work.
- (2) Transitional Housing: The number of transitional housing units is extremely limited. If the number of homeless in Gwinnett County is approximately 500 families who need Transitional Housing , approximately 345 units of transitional housing are required, with only 35 units currently available.
- (3) Affordable Housing: Permanent affordable and permanent supportive housing is in short supply in Gwinnett County, and no organization currently has a program to develop a sufficient supply of such housing for persons who are exiting transitional housing and moving into the permanent housing market.

INVESTMENT STRATEGIES

HOMELESS Emergency Shelter/Transitional Housing/Permanent Housing

1. Analysis

- (1) Persons most in need (e.g., those with the fewest resources) were identified as a top priority client group for
- (2) Gwinnett's housing/homeless/community development programs. The homeless population is growing
- (3) throughout the county and priorities have been established to increase emergency shelter, transitional housing,
- (4) and supportive services. Emergency shelter, transitional housing, and low-cost rental units are not able to meet
- (5) the demand. Housing costs continue to escalate at the same time the number of very low- and other low-income
- (6) households seeking affordable housing is increasing. Much of the homeless population in the suburban areas is
- (7) made up of women and families with children. Therefore, it is important to have a range of shelters and
- (8) supportive services.

2. Obstacles

There are several obstacles to meeting the needs of homeless persons: insufficient standard low-cost rental housing, insufficient transitional programs and housing, need for supportive services for the range of homeless constituents, need for higher wage jobs, limited government resources, reluctance of the community at large to recognize homelessness as an issue.

3. Strategy Development - Investment Plan (Activities and Programs)

Housing the homeless is one of the five major goals for Gwinnett County's Consolidated Plan, 2009-2013. Priority strategies to help deal with homelessness include rental assistance, supportive facilities and services. The county will work closely with nonprofits which provide shelter and related services. Special efforts will be made for the most vulnerable of the homeless population: children, families with children, and persons with special needs who require services to achieve and maintain independent living. The objective of the programs is to assist families and individuals in making the transition to permanent housing and independent living. Even with homelessness as a priority, funding is too limited to meet the demand for shelter and services. The County and/or the nonprofit service providers will also seek additional federal and state funding and strengthen case management services locally.

4. Strategy Implementation (Homeless)

Provide transitional housing, with comprehensive supporting services, to current and former homeless adults and families. Provide emergency shelter, with supportive services, to homeless adults and families.

A. Investment Plan (Activities and Programs for Each Priority) Programs and Resources:

Gwinnett County will use several resources to help meet the goals of the Plan, including Federal, state and local programs, and collaborations with private sector sources. Gwinnett County plans to use the following programs for transitional housing and permanent supportive housing and support services:

- HOME Program Funds for Transitional Housing
- Georgia Housing Trust Fund
- Georgia Department of Community Affairs (DCA) HOME Program Funds Health and Human Services
- Coalition Referral System
- HUD's SuperNOFA Grant Programs
- Rainbow Village Transitional Housing
- Travelers Aid of Metro Atlanta
- Private Foundations/Corporate Donations.

B. Plan for Leveraging Private and Non-Federal Funds:

Gwinnett County is committed to leveraging all resources to the greatest extent possible. For example, the County will work with the State of Georgia in the financing of shelters and transitional housing and for assistance with the implementation of the HMIS system.

The County will also seek funding or assist nonprofit organizations seeking funding from the State of Georgia in the financing of shelters, transitional housing or permanent housing for the homeless.

C. Matching Requirements:

The Gwinnett County ESG program requires a 1:1 match of funds. HOME Program funds from Gwinnett County used to acquire or rehabilitate transitional housing require a 1:4 match.

D. Categories of Residents to be Assisted

(1) Homeless adults, families, children, and Very low-income households of all household sizes, based on need and available services.

(2) Homeless Families (with 2 adults)

In general, the resources for homeless families with children are extremely limited. Shelters will be provided to house approximately 100 families over the Plan period.

(3) Homeless Female-Headed Families

Shelter and supportive services will be provided 500 mothers with children.

(4) Homeless Children

Approximately 2,000 homeless children will be served during the Plan period.

(5) Homeless Persons with Special Needs

Countywide, there are few resources for homeless persons with special needs. Persons with challenges such as substance abuse problems and persons diagnosed with AID/HIV and related diseases are directed to the respective state agencies for assistance. Special needs such as persons fleeing domestic violence and homeless youth are addressed through the PADV Shelter and the Children's Shelter. Both of these shelters, however, face demands which exceed their capacity to serve.

Any efforts to help homeless persons with special needs (require services to achieve and maintain independent living) to make the transition to permanent housing and independent living require services from other agencies such as the Georgia Department of Family and Children Services (DFCS) and the GRN Community Service Board [mental health/substance abuse services].

E. Homeless Service Goals:

For this Plan period, Gwinnett County will assist homeless persons and families, as follows:

- The Health and Human Services Coalition HELPLINE referral system expects to assist approximately:
 - 300 very low-income persons;
 - 600 homeless adults;
 - 450 homeless families; and
 - 600 female-headed families

Of these families, it is expected that 45 very low-income families and 30 other low-income families will receive transitional housing assistance.

Rainbow Village expects to provide transitional housing to 35 families.

The Partnership Against Domestic Violence Shelter expects to provide shelter to its 1000 clients (women with children) on an extended basis [more than 30 days] as needed. The Partnership Against Domestic Violence Shelter also expects to shelter 300 single women and 15 elderly women.

Norcross Cooperative Ministry will serve families with children (as the top priority) and will serve approximately 4,000 persons who are homeless.

THE IMPACT GROUP will provide transitional housing to 70 individuals who are members of approximately 25 families.

Rainbow Village will provide transitional housing to 30 individuals who are members of approximately 10 families.

The Salvation Army will transport 200 homeless single adults to its Atlanta shelter.

The Asian-American Resource Center will provide transitional housing assistance to 20 individuals.

Distinguished Women With a Purpose will provide transitional housing to 20 individuals.

F. Geographic Distribution of Services:

Emergency shelter and transitional housing services are provided in the areas in Gwinnett County with the largest numbers of identifiable homeless families and individuals [Interstate 85 Corridor - particularly Norcross; and in the Lawrenceville area]. The available emergency shelter, transitional housing, and shelters for abused persons serve persons from throughout Gwinnett County.

Homelessness continues to increase in Gwinnett County, particularly in the female-head of family group and the number of abused and/or homeless children in Gwinnett County is increasing at a rate approaching that of the growth in the population, as a whole. The existing shelters are planning expansions to help meet the growing need. Funding for these programs is a constant challenge.

G. Service Delivery and Management:

Each of the emergency shelter and transitional housing programs identified are managed by their sponsors. The Health and Human Services Coalition Referral Service provides referrals and placement assistance for homeless families and individuals who seek its services. During each year more than 1,500 persons request assistance through the HELPLINE, and a significant number of these calls are individuals or families who are homeless or who are in danger of becoming homeless.

HOMELESSNESS PREVENTION

1. Analysis

The number of households threatened with homelessness is increasing in the County. Emergency assistance and supportive services are essential to prevent homelessness. Those most often threatened with homelessness are the very low-income households, who typically do not have any savings or personal safety net to weather financial emergency such as job loss, illness, abandonment by primary wage-earner, and eviction. In addition, many at-risk households [the hidden homeless] live in overcrowded conditions, doubling up with relatives or acquaintances.

2. Obstacles

Because the social safety net is so limited, the very low-income persons and families with children are at greatest risk of becoming homeless. The chief obstacles to preventing homelessness include limited resources for skills training and job placement initiatives, affordable childcare, emergency assistance, and effective advocacy for this target group. In addition, more funding is required to improve the living conditions related to safety and code issues so families are not displaced or forced to live in overcrowded, unsanitary conditions. With the growing immigrant population in Gwinnett County it is likely that overcrowding will continue the presence of an increasing "hidden homeless" population.

3. Strategy Development - Investment Plan (Activities and Programs)

The County works with agencies to develop programs to keep people in their current housing. Such programs include emergency grants to cover rent/mortgage and/or utilities for very low-income households. Gwinnett County utilizes the maximum permitted (30%) of its ESG funds to provide homeless prevention.

The County will assist the homeless providers working to fulfill the homeless goals and priority objectives, by aiding these organizations when they seek federal funding from existing programs (e.g., HOME, CDBG, HOPWA, Section 202, Section 811, and HUD SuperNOFA Programs), and any yet-to-be-created programs. If the federal funding mechanism for McKinney Act funds is altered to provide additional homeless funding directly to Entitlement Urban Counties, the County will have additional resources to fund the gaps in its present Continuum of Care for the homeless. The County will assist its nonprofit service provider organizations in seeking state funding and work to facilitate more private investment in the very low-, other low- and moderate-income communities. The County will also support activities undertaken by local organizations working in the affordable housing arena, especially for applications for funding, providing technical assistance where necessary, and facilitating program development where requested.

Where market shifts occur which alter the level of need among any particular tenure type, the County will adjust its programs and funding levels accordingly to meet the change in demand for affordable housing services.

4. Strategy Implementation [Homeless Prevention]

A. Investment Plan (Activities and Programs)
Programs and Resources

The Gwinnett County Community Development Program uses several resources to help meet the goals of the Consolidated Plan, including Federal programs, state and local programs, and collaborations with private sector sources. Specifically for the programs listed above, Gwinnett County makes use, or assists other organizations to use, the following programs: CDBG, HOME, ESG, Section 8, Section 202, Section 811, Georgia Housing Trust Fund, HUD Supportive Housing Program, HUD Shelter Plus Care Program, and the Coalition for Health and Human Services Referral System. Norcross Cooperative Ministry, GRN Community Service Board, Asian-American Resource Center and other possible providers will provide homeless prevention assistance to 500 individuals during the Plan period. Outreach occurs through cooperation and referrals among service providers. Outreach also occurs through the "Helpline" operated by the Gwinnett County Health and Human Services Coalition where persons are referred to various public and private non-profit organizations appropriate to their needs.

B. Plan for Leveraging Private and Non-Federal Funds:

Gwinnett County is committed to leveraging all resources to the greatest extent possible. Churches and nonprofit organizations are urged to solicit donations [personal and corporate] to help defray the cost of providing housing and services to prevent homelessness.

C. Matching Requirements:

The Emergency Shelter Grant Program (Prevention) requires a 1:1 match of funds or more.

D. Categories of Residents to be Assisted:

Very low-income, Low-income, Moderate-income, Elderly, Near Homeless, households of all sizes, based on need.

Table 2
[HUD Table 1B]
Summary of Specific Homeless Objectives

Local Obj #	Specific Objectives	Performance Measure	Expected Units	Actual Units
	Homeless Objectives			
HML1	Support non-profit private and public entities that provide housing opportunities for at-risk populations	People	200	To Be Reported Each Year
HML2	Address the emergency shelter needs of homeless persons, including individuals, families, adults and youth.	People	4000	To Be Reported Each Year
HML3	Provide outreach to homeless persons for assessment of their individual needs	People	500	To Be Reported Each Year
HML4	Address the transitional housing needs of homeless persons, including individuals, families, adults and youth	People	75	To Be Reported Each Year
HML5	Help homeless persons make the transition to permanent housing and independent living	People	10	To Be Reported Each Year
HML6	Help prevent homelessness of low-income individuals and families	People	200	To Be Reported Each Year

The Gwinnett/Rockdale/Newton Community Service Board is the local provider of services to persons with mental health or substance abuse issues and problems. The GRN provides these services on a “out-patient” basis to persons who are leaving mental health facilities. Housing is provided by GRN for such clients via rental of affordable apartments.

For homeless persons leaving physical health facilities, the providers of emergency shelter and transitional housing in Gwinnett County offer housing opportunities through housing which they own or rent.

HOUSING GOALS AND PRIORITY OBJECTIVES

Gwinnett County has three Housing Goals with accompanying Priority Objectives in the Unified Plan, each of which are listed in this portion of the Plan.

HOUSING GOALS
Increase Access to Affordable Housing for Low and Moderate-income Persons [AH].
Eliminate Substandard Housing for Low and Moderate-income Individuals, Families, and Households [HR] Increase Housing and Supportive Services for Individuals and Families with Special Needs [SNH]

GOAL AH: <u>Increase Access to Affordable Housing for Low and Moderate-income Persons</u>
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Priority Objectives:

- AH1:** Principal Reduction [Downpayment Assistance] & Closing Cost Reduction for first-time homebuyers
- AH2:** Rehabilitation of existing housing for first-time home buyers
- AH3:** Home Buyer Education/Counseling
- AH4:** New construction of affordable housing for first-time home buyers
- AH5:** Reduction of acquisition and development costs for affordable single family housing
- AH6:** Reduction of acquisition and development costs for affordable multi-unit housing
- AH7:** Encourage private and non-profit developers by funding acquisition, development and rehabilitation activities

GOAL HR: <u>Eliminate Substandard Housing for Low and Moderate-income Individuals And Families and Households</u>
--

Priority Objectives:

- HR1:** Rehabilitate owner-occupied homes
- HR2:** Energy Conservation and Weatherization for single- and multi-unit housing.
- HR3:** Home Owner Education
- HR4:** Replacement construction for non-feasible rehabilitation
- HR5:** Hazardous Materials Abatement/Removal [Lead/asbestos]
- HR6:** Rehabilitate multi-unit homes
- HR7:** Housing Code [Property Maintenance] Activities

GOAL SNH: Increase Housing and Supportive Services for Individuals and Families with Special Needs

Priority Objectives:

- SNH1** Support the efforts of public and private non-profits to create additional housing options for special needs clientele

- SNH2** Support the efforts of public private non-profits to acquire, construct, or rehabilitate housing for disabled persons, including persons with AIDS/HIV and persons who are diagnosed with substance abuse and/or physical or mental disabilities.

- SNH3** Support the efforts of public and private non-profits to acquire and/or construct transitional housing for special needs individuals

- SNH4** Financial Assistance with housing for special needs populations

HOUSING NEEDS

Categories of Persons Affected

Presented here are needs for assistance for by income categories: (1) less than 30% Median Family Income (MFI); and (3) 30%-50% MFI; 51-80% MFI, grouped by renter/homeowner status, family size, age status [elderly/non-elderly], disability status, and HIV/AIDS status. Needs are described in terms of following problems: any housing problems, cost burden [30% of income expended for housing], and severe cost burden [50% or more spend for housing]. Data is derived from Census 2000 tabular materials provided by HUD.

A HUD-required (Table 3A) follows which lists estimated Priority Housing Needs for Low- and Moderate-Income Renters, Homeowners, and Special Populations who are not homeless. The Unmet Need data was derived from the CHAS Table 1C information presented in Table 23A.

Table 3A
(HUD Table 2A)
Priority Housing Needs Summary Table

PRIORITY HOUSING NEEDS (Households)		Priority Need Level High, Medium, Low		Unmet Need [See Table 24 - CHAS Table 1C – All Households]	Multi Year Goals
Renter	Small Related	0-30%	H	1970	1
		31-50%	H	3065	2
		51-80%	H	3075	3
	Large Related	0-30%	M	830	2
		31-50%	M	1030	8
		51-80%	M	1235	15
	Elderly	0-30%	M	615	2
		31-50%	M	425	2
		51-80%	M	274	1
	All Other	0-30%	L	1480	0
		31-50%	L	2005	0
		51-80%	L	3510	0
Owner		0-30%	H	3540	25
		31-50%	H	5018	30
		51-80%	H	10662	120
Special Needs		0-80-%	L	500	8
Total 215 Goals					219
Total 215 Renter Goals					36
Total 215 Owner Goals					175

Table 3B
(HUD Table 2A)
PRIORITY HOUSING ACTIVITIES

PRIORITY HOUSING ACTIVITIES	Priority	Multi-Yr	Annual
		Goals	Goals
CDBG			
Acquisition of existing rental units	N	0	0
Production of new rental units	N	0	0
Rehabilitation of existing rental units	N	0	0
Rental assistance	N	0	0
Acquisition of existing owner units	N	0	0
Production of new owner units	N	0	0
Rehabilitation of existing owner units	H	50	10
Homeownership assistance	N	0	0
HOME			
Acquisition of existing rental units	N	0	0
Production of new rental units	N	0	0
Rehabilitation of existing rental units	N	0	0
Rental assistance	N	0	0
Acquisition of existing owner units	L	5	1
Production of new owner units	H	42	8
Rehabilitation of existing owner units	H	50	10
Homeownership assistance	H	50	10
HOPWA			
Rental assistance	N/A	N/A	N/A
Short term rent/mortgage utility payments	N/A	N/A	N/A
Facility based housing development	N/A	N/A	N/A
Facility based housing operations	N/A	N/A	N/A
Supportive services	N/A	N/A	N/A
Other			

The goals are derived largely from resources expected to be available from the CDBG, HOME and ADDI grant funds awarded to Gwinnett County and applied to the CHAS Table 1C households reporting “any housing problems.” Gwinnett County has no control over the award of additional funds by HUD or other agencies or the lending or granting of private resources for the acquisition, construction, or rehabilitation of housing units. Additional funds from these resources will help address the unmet needs listed in **Tables 3A and 3B**.

The goals are also depicted in another more specific format, in conformance with HUD’s Performance Measurements requirements in Table 3C (HUD Table 2C9).

**Table 3C
(HUD Table 2C)
Housing Activities
Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)**

Specific Obj.	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-1 Availability/Accessibility of Decent Housing							
DH-1.1	New construction of affordable housing for first-time homebuyers – Five Year Goal: 42	HOME	Number of affordable homeowner units constructed	2009	10		
				2010	8		
				2011	8		
				2012	8		
				2013	8		
		MULTI-YEAR GOAL				42	
DH-2 Affordability of Decent Housing							
DH-2.1	Principal reduction (downpayment assistance) and closing cost reduction for first-time homebuyers – Five Year Goal: 50 Rehabilitate owner-occupied housing – Five Year Goal: 100 Acquire/Rehabilitate affordable rental housing - Five Year Goal – 36 Units	HOME/ADDI	Number of low-income households assisted Number of first-time homebuyers	2009	30		
				2010	66		
				2011			
		CDBG/HOME	Number of homeowner units brought to standard condition	2012	30		
				2013	30		
		HOME	Number of rental units brought to standard condition	2013	30		
MULTI-YEAR GOAL				186			
DH-3 Sustainability of Decent Housing							
DH-3.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
		MULTI-YEAR GOAL					

**Table 3C
(HUD Table 2C)
Housing Activities
Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)**

Table 2C Summary of Specific Objectives

Specific Obj.	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
SL-1 Availability/Accessibility of Suitable Living Environment							
SL-1.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
SL-2 Affordability of Suitable Living Environment							
SL-2.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
SL-3 Sustainability of Suitable Living Environment							
SL-3.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							

**Table 3C
(HUD Table 2C)
Housing Activities
Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)**

Specific Obj.	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
EO-1 Availability/Accessibility of Economic Opportunity							
EO-1.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
EO-2 Affordability of Economic Opportunity							
EO-2.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
EO-3 Sustainability of Economic Opportunity							
EO-3.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							

**Table 3C
(HUD Table 2C)
Housing Activities
Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)**

Specific Objectives	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
NR-1 Neighborhood Revitalization							
NR-1.1	N/ .			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
O-1							
O-1.1	N/ .			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
 							
				2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							

TABLE 4: CHAS Table 1C - All Households

Name of Jurisdiction: Gwinnett County, Georgia Source of Data: CHAS Data Book						Data Current as of 2000			
Household by Type, Income, & Housing Problem	Renters					Owners			
	Elderly (1 & 2 Member) Households	Small Related Households (2 to 4 persons)	Large Related Households (5 or more)	All Other Households	Total Renters	Elderly (1 & 2 Member) Households	All Other Households	Total Owners	Total Households
	(A)	(B)	(C)	(D)	(E)	(F)	(I)	(J)	(L)
1. Extremely Low & Very Low Income	1,770	5,780	1,924	4,180	13,654	4,518	7,809	12,327	25,981
2. Extremely Low Income (0% to 30% AMI)	1,070	2,450	849	2,005	6,374	1,934	3,120	5,054	11,428
3. % with any housing problems	57.5	80.4	97.8	73.8	78.4	60.4	76.0	70.0	73.8
4. % Cost Bur den >30%	57.5	76.9	91.9	72.8	75.8	60.2	72.8	68.0	71.5
5. % Cost Burden >50%	47.7	70.8	77.7	69.1	62.4	44.0	65.6	57.4	62.9
6. Very Low Income (31% to 50% AMI)	700	3,330	1,075	2,175	7,280	2,584	4,689	7,273	14,553
7. % with any housing problems	60.7	92.0	95.8	92.2	82.2	40.0	85.0	69.0	79.3
8. % Cost Bur den >30%	60.7	88.6	79.1	92.2	78.1	39.6	82.4	67.2	76.4
9. % Cost Burden >50%	34.3	24.2	17.7	44.4	25.7	22.4	49.1	39.6	34.9
10. Low Income (51% to 80% AMI)	489	5,820	1,855	6,035	14,199	3,485	15,202	18,687	32,886
11. % with any housing problems	56.0	52.8	66.6	58.2	42.1	31.3	63.0	57.1	57.1
12. % Cost Bur den >30%	56.0	44.2	19.4	55.8	34.6	31.3	58.1	53.1	50.2
13. % Cost Burden >50%	8.0	1.0	1.7	2.4	2.1	7.7	13.7	12.6	7.9
14. Moderate to Upper Income (80% and greater AMI)	785	12,990	2,515	11,550	27,840	8,980	106,535	115,515	143,355
15. % with any housing problems	4.5	13.0	53.1	8.0	9.1	6.9	11.4	11.1	11.7
16. % Cost Bur den >30%	4.5	4.0	8.0	3.9	2.8	6.7	9.1	8.9	7.9
17. % Cost Burden >50%	1.3	0.1	0.0	0.1	0.3	6.0	0.8	8.0	6.0
18. Total Households	3,044	24,590	6,294	21,765	55,693	16,983	129,546	146,529	202,222
19. % with any housing problems	44.3	40.0	70.4	36.3	42.2	23.0	21.7	21.8	27.4

TABLE 5: CHAS Table 1C – White Non-Hispanic Households – Housing Problems

Name of Jurisdiction: Gwinnett County, Georgia		Source of Data: CHAS Data Book			Data Current as of: 2000				
Household by Type, Income, & Housing Problem	Renters				Owners				Total Households
	Elderly 1 & 2 Member Households	Family Households	All Other Households	Total Renters	Elderly 1 & 2 Member Households	Family Households	All Other Households	Total Owners	
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
1. Extremely Low & Very Low Income	1,495	2,265	2,205	5,965	4,195	3,245	1,420	8,860	14,825
2. Extremely Low Income (0% to 30% AMI)	895	895	1,120	2,910	1,725	1,160	720	3,605	6,515
% with any housing problems	53.1	78.8	71	67.9	60.6	73.3	70.1	66.6	67.2
3. Very Low Income (31% to 50% AMI)	600	1,370	1,085	3,055	2,470	2,085	700	5,255	8,310
% with any housing problems	58.3	88.3	89.9	83	39.3	82.7	82.9	62.3	69.9
4. Low Income (51% to 80% AMI)	460	3,105	3,535	7,100	3,320	8,065	2,325	13,710	20,810
% with any housing problems	57.6	48	57.6	53.4	29.8	55.7	67.5	51.4	52.1
5. Moderate to Upper Income (80% and greater AMI)	665	7,535	7,185	15,385	8,595	74,305	12,060	94,960	110,345
% with any housing problems	4.5	8.7	5.5	7	6.6	7.8	15	8.6	8.4
6. Total Households	2,620	12,905	12,925	28,450	16,110	85,615	15,805	117,530	145,980
% with any housing problems	42.7	31.5	32.5	33	22.2	15	28.2	17.8	20.7

TABLE 6: CHAS Table 1C – Black Non-Hispanic Households – Housing Problems

Name of Jurisdiction: Gwinnett County, Georgia		Source of Data: CHAS Data Book				Data Current as of: 2000			
Household by Type, Income, & Housing Problem	Renters				Owners				Total Households
	Elderly 1 & 2 Member Households	Family Households	All Other Households	Total Renters	Elderly 1 & 2 Member Households	Family Households	All Other Households	Total Owners	
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
1. Extremely Low & Very Low Income	125	2,125	1,200	3,450	190	640	165	995	4,445
2. Extremely Low Income (0% to 30% AMI)	70	870	480	1,420	120	260	70	450	1,870
% with any housing problems	78.6	86.2	89.6	87	58.3	82.7	71.4	74.4	84
3. Very Low Income (31% to 50% AMI)	55	1,255	720	2,030	70	380	95	545	2,575
% with any housing problems	72.7	94.4	95.8	94.3	50	90.8	68.4	81.7	91.7
4. Low Income (51% to 80% AMI)	14	1,935	1,715	3,664	55	1,330	405	1,790	5,454
% with any housing problems	71.4	54	56	55	54.5	66.9	84	70.4	60
5. Moderate to Upper Income (80% and greater AMI)	55	4,105	3,035	7,195	115	7,510	2,075	9,700	16,895
% with any housing problems	0	18.5	6.9	13.5	30.4	17.2	22.4	18.5	16.3
6. Total Households	194	8,165	5,950	14,309	360	9,480	2,645	12,485	26,794
% with any housing problems	54.1	45.8	38.5	42.9	47.2	28.9	34.8	30.7	37.2

TABLE 7: CHAS Table 1C – Hispanic Households

Name of Jurisdiction: Gwinnett County, Georgia		Source of Data: CHAS Data Book			Data Current as of: 2000				
Household by Type, Income, & Housing Problem	Renters				Owners				Total Households
	Elderly 1 & 2 Member Households	Family Households	All Other Households	Total Renters	Elderly 1 & 2 Member Households	Family Households	All Other Households	Total Owners	
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
1. Extremely Low & Very Low Income	55	2,250	420	2,725	49	1,095	70	1,214	3,939
2. Extremely Low Income (0% to 30% AMI)	55	1,025	195	1,275	20	365	60	445	1,720
% with any housing problems	72.7	89.3	82.1	87.5	50	87.7	58.3	82	86
3. Very Low Income (31% to 50% AMI)	0	1,225	225	1,450	29	730	10	769	2,219
% with any housing problems	N/A	96.7	95.6	96.6	86.2	93.2	100	93	95.3
4. Low Income (51% to 80% AMI)	4	1,805	375	2,184	14	1,285	100	1,399	3,583
% with any housing problems	100	67.6	61.3	66.6	28.6	76.3	80	76.1	70.3
5. Moderate to Upper Income (80% and greater AMI)	15	2,285	650	2,950	119	3,575	285	3,979	6,929
% with any housing problems	0	51.9	33.8	47.6	3.4	32	15.8	30	37.5
6. Total Households	74	6,340	1,445	7,859	182	5,955	455	6,592	14,451
% with any housing problems	59.5	71.1	57.1	68.4	23.6	52.5	37.4	50.6	60.3

**TABLE 8A
HUD Table 1C
Homeless Activities
Summary of Specific Objectives
(Table 1A/1B Continuation Sheet)**

Specific Obj.	Outcome/Objective # Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-1 Availability/Accessibility of Decent Housing							
DH-1.1				2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
DH-2 Affordability of Decent Housing							
DH-2.1	Help prevent homelessness of low-income individuals and families	ESG	Number of adults and children served	2009	100		
				2010	100		
				2011	100		
				2012	100		
				2013	100		
MULTI-YEAR GOAL					500		
DH-3 Sustainability of Decent Housing							
DH-3.1				2009	800		
				2010	800		
				2011	800		
				2012	800		
				2013	800		
MULTI-YEAR GOAL					4000		

**Table 8B
HUD Table 1C
Homeless Activities
Summary of Specific Objectives
(Table 1A/1B Continuation Sheet)**

Specific Obj.	Outcome/Objective Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
SL-1 Availability/Accessibility of Suitable Living Environment							
SL-1.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
SL-2 Affordability of Suitable Living Environment							
SL-2.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
MULTI-YEAR GOAL							
SL-3 Sustainability of Suitable Living Environment							
SL-3.1	Address the emergency shelter needs of homeless persons, including individuals, families, adults, and youth. – Five Year Goal: 4,000	ESG	Number of adults served: 1500 Number of children served: 2500	2009	820		
				2010	820		
	Address the transitional Housing Needs of homeless persons, including individuals, families, adults, and youth. – Five Year Goal:	SHP		2011	820		
				2012	820		
				2013	820		
MULTI-YEAR GOAL				4100			

**Table 8B
HUD Table 1C
Homeless Activities
Summary of Specific Objectives
(Table 1A/1B Continuation Sheet)**

Specific Obj.	Outcome/Objective # Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
EO-1 Availability/Accessibility of Economic Opportunity							
EO-1.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
				MULTI-YEAR GOAL			
EO-2 Affordability of Economic Opportunity							
EO-2.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
				MULTI-YEAR GOAL			
EO-3 Sustainability of Economic Opportunity							
EO-3.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
				MULTI-YEAR GOAL			
MULTI-YEAR GOAL							

**Table 8B
HUD Table 1C
Homeless Activities
Summary of Specific Objectives
(Table 1A/1B Continuation Sheet)**

Specific Obj.	Outcome/Objective # Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
NR-1 Neighborhood Revitalization							
NR-1.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
				MULTI-YEAR GOAL			
O-1 Other							
O-1.1	N/A			2009			
				2010			
				2011			
				2012			
				2013			
				MULTI-YEAR GOAL			
 							
				2009			
				2010			
				2011			
				2012			
				2013			
				MULTI-YEAR GOAL			

OTHER HOUSING ISSUES

Environmental Quality - Lead-Based Paint Hazard

Lead-based paint is a growing health and environmental concern nationally, and to a lesser extent in Gwinnett County. Lead is the number one environmental health hazard to American children. An estimated 10-15% of all preschoolers in the United States are affected by lead poisoning. Most lead poisoning results from exposure to lead paint dust. The irreversible health effects of lead poisoning include IQ reductions; reading and learning disabilities; decreased attention span; and hyperactivity and aggressive behavior.

Lead was banned from residential paint in 1978. Older homes are more likely to have lead-based paint than newer homes. An estimated 90% of dwelling units built before 1940 have lead-based paint in the interior or on the exterior, while 62% of homes built between 1960 and 1979 have lead-based paint. The age of the unit is the only attribute for which the differences between categories are significant.

Housing units identified in **Table 9** reflect the estimated "incidence" (existence) of lead-based paint based on the year of construction of the housing. Only units that have been inspected as a part of Gwinnett federally assisted housing activities will have been tested for the presence of "lead-based paint hazards."

"Lead-Based Paint Hazard" means any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency. The only way to determine hazards is to test for lead in dust, soil, deteriorated paint, chewable paint surfaces, friction paint surfaces, impact paint surfaces, and children.

Gwinnett County had the fewest units with the potential incidence of LBP (31,192 units) and the lowest percentage (23%) because housing development in the 1980's more than doubled the units previously available. Because two-thirds of the units were built after 1980, the incidence of lead-based paint is much lower in Gwinnett County. Approximately 5,130 units were occupied by very low-income households, and 14,586 units are occupied by other low-income households.

Tables 9 and Table 10 depict the estimated presence of lead in housing according to the age of housing in Gwinnett County.

Table 9
Estimated Number of Housing Units With Expected
Incidence of Lead-Based Paint [LBP]
Gwinnett County

Year Built	# Units	Estimated # with LBP
1980 and After	113,095	0
1960-1979	40,967	25,400
1940-1959	5,177	4,142
Before 1940	1,833	1,650
Totals	161,072	31,192

The year of construction of housing is the key variable for estimating the number of housing units with lead-based paint. Nationally, the percentage of units containing lead increases with the age of the structure. These figures include estimates of all housing with some lead-based paint, no matter how little. The estimates show incidence of lead-based paint, not demonstrated hazards. The following national percentages were applied to housing stock in the Consortium to arrive at the figures in the table above.

**Table 10
Estimated Percentage of Housing Units
Expected to Possess Lead-Based Paint
Gwinnett County**

Year Built	Percent with Lead-Based Paint
After 1980	0%
1960-1979	62%
1940 -1959	80%
Before 1940	90%

Testing of individual housing units requesting Housing Rehabilitation or Downpayment Assistance is necessary to determine the actual incidence of lead-based paint. Decisions on which units which to be tested to determine if they contain Lead Based Paint, is determined initially by the age of the structure and from a visual inspection of the structures.

Children with blood lead poisoning in Gwinnett County are almost non-existent, with only rare reports of incidents reported to the Gwinnett County Board of Health or the Gwinnett County Department of Family and Children Services. Neither organization has any current case load for lead poisoning.

Table 11 is an estimate of the number of housing units with lead-based paint by age of housing stock and income category of occupants:

**Table 11
Estimate of Housing Units in Gwinnett County
With Lead-Based Paint
By Income Group and Age of Housing Stock**

Income Group	Years of Construction of Housing Units		
	Before 1940	1940 – 1959	1960 - 1979
0-50% MFI [Very Low Income]	696	1,342	3,292
51% - 80% MFI [Low Income]	474	1,710	12,402
Other Households	480	1,090	9,706
Total Housing Units With Possible Lead-Based Paint Hazards	1,650	4,142	25,400

FAIR HOUSING

Gwinnett County completed the Analysis of Impediments to Fair Housing Choice [“A.I.”] in 1998, prepared by Metro Fair Housing Services, Inc. The “A.I.” contained seven impediments:

- 1) Fair Housing audits revealed significant levels of disparate and/or discriminatory treatment based on race among housing providers in the rental, sales and lending markets.
- 2) Disability tests conducted at new multifamily housing units (apartment complexes) showed significant levels of handicap accessibility violations.
- 3) Availability of affordable housing is insufficient in meeting the needs of low-to-moderate-income families in both apartment rental and single-family home purchases.

- 4) Lack of emphasis on affordable housing community awareness and homebuyer education programs.
- 5) Code sections in the current zoning ordinances are not in compliance with recent fair housing court decisions as they relate to the definition of personal care homes.
- 6) The County does not have an established fair housing enforcement program.
- 7) The County does not have a fair housing ordinance.

Recommendations from the "A.I." were utilized to develop a local "action plan" to address the impediments identified in the "A.I.". Gwinnett County utilized the recommendations from the "A.I." and contracted with Gwinnett Housing Resource Partnership [GHRP], a HUD-certified Fair Housing and Housing Counseling agency, to assist with the implementation of the local action plan to address the identified impediments to fair housing choice in Gwinnett County. The implementation actions were initiated during 2001, and continued through the time when this document was prepared. Progress on addressing the impediments is contained in the Consolidated Annual Performance and Evaluation Reports for all years of the Plan period and later years, if needed.

Gwinnett County will initiate the preparation of a new "A.I." during the first year of the Plan period. The number of minority residents in Gwinnett County has risen both as total numbers of individuals and as a percentage of the overall population. Therefore, Fair Housing activities will take on a greater importance during the Plan period.

Public and Assisted Housing.

Presented below is information pertaining to the number of public housing units and the physical condition of such units; restoration and revitalization needs; needs of tenants and applicants on waiting lists for available units (Section 504 needs assessment); and public housing agencies' strategy for improving management and operation and for improving the living environment. Authorities participating in a HUD Comprehensive Grant Program (modernization) are also presented.

a. Public Housing Inventory

Traditionally, assisted housing has consisted of public housing owned and operated by housing authorities for low-income households and for elderly or disabled persons. Three Public Housing Authorities (PHA) in Gwinnett County, operate 441 housing units (Buford Housing Authority: 186 units; Lawrenceville Housing Authority: 212 units; and Norcross Housing Authority: 44 units). Currently, the demand for low cost housing far outweighs the supply of public housing units. With occupancy rates running at 99%, there is an approximate waiting period of 3 to 48 months for a unit operated by these authorities. When waiting lists are open, federal preferences are used, no local preferences are used.

Units have been modernized in all of the authorities. In addition, Gwinnett County has weatherized units in Lawrenceville and Norcross to help reduce energy costs for the residents.

Location	0/1 BR	2 BR	3 + BR	Totals
Buford	32	77	77	186
Lawrenceville	73	77	62	212
Norcross	10	21	12	43
TOTALS	115	175	151	441

Gwinnett County is not aware of any potential loss of public housing units.

b. Section 8 Units

The Georgia Department of Community Affairs operates the Section 8 tenant-based program in Gwinnett County. All of the housing complexes with Section 8 units have waiting lists ranging from two to eight years, and all use federal preferences for placing persons/families with greatest immediate need. Most recipients of Section 8 assistance receive Section 8 Vouchers, rather than receiving project-based Section 8; however the following is a list of Project Based Section Units in Gwinnett:

Type of Housing	0/1 BR	2 BR	3 + BR	Totals
Christian Towers II	125	0	0	125
Ambers Apts.	4	16	0	20
Bradford Gwinnett Apts.	18	46	31	95
Wilocks Apts. (8 are handicapped accessible)	8	8	2	18
Westbury Sp. Apt.	8	22	0	30
Broadway Towers	75	0	0	75
TOTALS	238	92	33	363

c. Other Assisted Housing

A total of 140 other assisted units exist in Gwinnett County. One project, Applewood, has 100 zero (0) - one (1) bedroom units for elderly persons and uses Section 202 funds. Christian Terrace has forty units of zero (0) -one (1) bedroom units for mobility handicapped persons. Lilburn Terrace used Section 811 funds to develop the facility. Annandale has approximately one hundred (100) units of special housing for the handicapped of these twelve are HUD Section 202 assisted. United Cerebral Palsy has two group homes for persons with disabilities in Snellville, which house four residents, each.

The number and targeting [income level and type of housing served] of units currently assisted by local, state, or federally funded programs is presented here, where the needs of public housing are summarized in the following table. Following the table is information describing improvements which are being/have been made by the PHA's in Buford, Lawrenceville and Norcross during the Plan period.

**Table 12
(HUD Table 4)
Public Housing Needs
Local Jurisdiction – City of Buford Housing Authority**

Public Housing Need Category	PHA Priority Need Level High, Medium, Low, No Such Need	Estimated Dollars To Address
Restoration and Revitalization		
Capital Improvements	Information Not Available	Information Not Available
Modernization	Information Not Available	Information Not Available
Rehabilitation (Convert Old Office to	Information Not Available	Information Not Available
Other (Specify)	Information Not Available	Information Not Available
Expand Maintenance Facility	Information Not Available	Information Not Available
Improved Parking	Information Not Available	Information Not Available
Expand Offices	Information Not Available	Information Not Available
Management and Operations	Information Not Available	Information Not Available
Improved Living Environment	Information Not Available	Information Not Available
Neighborhood Revitalization (non-	Information Not Available	Information Not Available
Capital Improvements [Central A/C	Information Not Available	Information Not Available

Safety/Crime Prevention/Drug	Information Not Available	Information Not Available
Other (Specify)	Information Not Available	Information Not Available
Economic Opportunity	Information Not Available	Information Not Available
Resident Services/Family Self	Information Not Available	Information Not Available
Other (Specify)	Information Not Available	Information Not Available
Total	Information Not Available	Information Not Available

**Table 13
(HUD Table 4)
Public Housing Needs
Local Jurisdiction – City of Lawrenceville Housing Authority**

Public Housing Need Category	City PHA Priority Need Level High, Medium, Low, No Such Need	Estimated Dollars To Address
Restoration and Revitalization		
Capital Improvements	H	\$75,000
Modernization	H	\$869,410
Rehabilitation	N	\$0
Other (Specify)		
Dwelling Unit Equipment	H	\$100,000
Non-dwelling structures	H	\$100,000
Management and Operations	H	\$3,420,460
Improved Living Environment		
Neighborhood Revitalization (non-capital)	N	
Capital Improvements	N	
Safety/Crime Prevention/Drug Elimination	H	\$135,000
Other (Specify)		
Economic Opportunity		
Resident Services/Family Self Sufficiency	N	
Other (Specify)		
After-school centers (2)	H	\$250,000
Transportation	H	\$100,000
Computer Lab for Adult Education	H	\$280,000
Total		\$5,329,170

**Table 14
(HUD Table 4)
Public Housing Needs
Local Jurisdiction – City of Norcross Housing Authority**

Public Housing Need Category	PHA Priority Need Level High, Medium, Low, No Such Need	Estimated Dollars To Address
Restoration and Revitalization		
Capital Improvements	Information Not Available	Information Not Available
Modernization	Information Not Available	Information Not Available
Rehabilitation	Information Not Available	Information Not Available
Other (Specify)	Information Not Available	Information Not Available
	Information Not Available	Information Not Available
	Information Not Available	Information Not Available
	Information Not Available	Information Not Available
Management and Operations	Information Not Available	Information Not Available
Improved Living Environment	Information Not Available	Information Not Available
Neighborhood Revitalization (non-	Information Not Available	Information Not Available
Capital Improvements	Information Not Available	Information Not Available
Safety/Crime Prevention/Drug	Information Not Available	Information Not Available
Other (Specify)	Information Not Available	Information Not Available
Economic Opportunity	Information Not Available	Information Not Available
Resident Services/Family Self	Information Not Available	Information Not Available
Other (Specify)	Information Not Available	Information Not Available
Total	Information Not Available	Information Not Available

a. PUBLIC HOUSING IMPROVEMENTS

Each of the local public housing authorities has taken steps to improve the management and operations of the housing authorities and will continue their efforts this year. Such activities to encourage public housing residents to become more involved in management are described in **Tables 12-14**.

BUFORD HOUSING AUTHORITY (BHA)

Management and Operations: The BHA provides 186 units of low-rent housing for very low- and low-income households. The demand for units is high, and BHA is working to reduce the turn-over time in order to house new families in need of affordable housing. In terms of housing improvements and maintenance issues, BHA is improving the response time for work requests.

Living Conditions: The BHA is actively working to improve the living conditions of the existing housing units through several measures including interior modernization with CIAP funds and installation of storm windows for increased energy efficiency. A lead-based paint abatement program is also underway. Security is increasing with the installation of security entrance doors to public housing developments. Accessibility to the homes is also improving with Section 504 to provide accessibility to persons with Disabilities to 112 units with \$80,000.

LAWRENCEVILLE HOUSING AUTHORITY (LHA)

Management and Operations: LHA provides 212 units of rental housing for very low- and low-income households. The LHA provides a forum for tenant participation through periodic tenant meetings.

Living Conditions: A program to increase resident safety and eliminate illegal drugs from the public housing communities will continue. LHA is also working in partnership with the Lawrenceville Police Department, the Gwinnett Sheriff's Office, the University of Georgia, and several other agencies to establish programs on-site for both children and adults. Such programs will include: GED Training, Tutoring and Counseling, Arts and Crafts, Karate and Dance Classes, Girl Scouts and Boy Scouts, and Senior Citizen Days. The LHA provides computer labs for adult education and after-school programs for its residents.

NORCROSS HOUSING AUTHORITY (NHA)

Management and Operations: The NHA provides 44 units of affordable public rental housing for very-low- and low-income households. Management and operations have improved in part because of a Lease Update.

Living Conditions: The units provided by NHA will be improved with several energy saving and aesthetic improvements. For instance, new storm doors have been installed at outdoor exits and interior doors have been replaced with wooden doors. Energy saving windows have also been installed to improve energy efficiency. In individual units, florescent lighting has been installed in the kitchens. Using CDBG Program assistance from Gwinnett County, the NHA replaced heating and air-conditioning systems in all of its 44 units of Public Housing.

BARRIERS TO AFFORDABLE HOUSING

Described here is the relationship of local public policies (tax policies, land use controls, zoning ordinances, building codes, fees and charges, growth limits, policies on return of residential investment) to the cost of housing or incentives to develop, maintain, or improve affordable housing.

Public Policies

The Consolidated Plan seeks to identify public policies and practices which may hinder the process of developing and preserving affordable housing. The Plan will be used to communicate information to County officials which might be used to affect changes in policies.

The major policy issues identified as barriers to developing affordable housing and suggested responses are discussed in this section.

Issue 1. Local Building Requirements

Current codes and zoning classifications offer developers in Gwinnett County limited flexibility to produce adequate housing that is affordable to many moderate- and low-income families. Code items which are seen as having the most impact on housing costs include: minimum square footage and minimum lot size requirements; and certain infrastructure requirements. Gwinnett County's "Conservation Subdivisions" may help with the affordability problem, over time.

Responses: Possible Modification of Local Building Requirements

Other communities around the state and nation have demonstrated that it is possible to modify development standards to permit development of more affordable housing while maintaining building and neighborhood quality. The County could evaluate the establishment of an affordable housing zoning classification which will allow developers and builders to construct more affordable housing. For example, a new classification should allow smaller units, greater density, reduced setbacks through easements, and other techniques for reducing the cost of development.

A part of the evaluation might be to propose for consideration to the Department of Planning and Development, that it could identify and revise development standards which could be changed to facilitate affordable housing creation. Possible modifications include: reducing right-of-way requirements on certain local streets; reducing interior setbacks; and waiving sidewalk requirements under certain conditions, by allowing some flexibility of site design, such as house placement, easements, and street widths. County and City governments can facilitate the development of affordable housing with thoughtful impact analysis of existing policies on affordable housing.

The construction or conversion of structures for housing in designated "mixed-use" areas of Gwinnett County may also offer opportunities to develop more affordable housing. Similarly, Gwinnett County's increasing focus on revitalization and redevelopment since 2000 may provide opportunities to redevelop older areas of the County to include more affordable housing.

Issue 2. Burdensome Federal and State Regulations

Federal and state programs and regulations often place requirements on local jurisdictions which drive up the cost of development. They frequently do not allow the flexibility needed for local communities to devise cost efficient solutions to their particular affordable housing problems.

Responses: Reduce Federal and State Regulations

Gwinnett County will work with and encourage the Congressional delegation and state representatives to pass legislation which allows local jurisdictions flexibility in funding allocations. Such legislation could

possibly focus on increasing local Block Grant capacity rather than programs that are very limited in scope. Efforts should also be made to establish procedures for reconciling conflicting requirements between the Federal, state and local levels, including elimination of redundant regulations. The CDP will continue to identify other negative policy barriers, so that they may be addressed and dealt with accordingly.

Issue 3. Historically Weak Policies to Preserve Existing Housing Stock

Gwinnett 2020, A Comprehensive Plan for Gwinnett County, Georgia addresses preservation of existing housing stock for affordable housing. Many inhabited units suffer from deferred maintenance and continue their decline until rehabilitation is not feasible. Some vacant and abandoned units go unattended.

Responses: Preserve Existing Affordable Housing Stock

Preservation of existing housing stock is a more cost effective method of creating and maintaining affordable housing compared to new construction. Renovation costs in Gwinnett County are typically less than \$40,000 per unit, while most new construction costs more than \$180,000 per unit. The County provides rehabilitation assistance to homeowners and renters. The CDP continue to provide comprehensive rehabilitation funds and emergency repairs, where conditions on housing units present an immediate threat to the health and safety of the residents.

In 2005, Gwinnett County implemented a concentrated code enforcement program in certain targeted areas and has subsequently expanded the program countywide. This new Quality of Life Program of the Gwinnett County Police Department is providing concrete action by the County to help preserve the housing and building stock in the County.

Issue 4. Lack of Public/Private Partnerships with Financial Institutions

More lender involvement in affordable housing efforts is needed.

Responses: Build Partnerships with Financial Institutions

Gwinnett County has built strong relationships with local financial institutions to help with the development of the County. The County and its non-profit partner, such as The IMPACT! Group, work with lenders to help them meet their Community Reinvestment Act (CRA) obligations. The CRA activities by lenders help build stronger neighborhoods by: identifying credit needs and market opportunities in low- and moderate-income areas; developing sound products to meet those needs; and promoting services to target markets. Further, such partnership collaborations may include development of products which leverage public resources, reduce bank risk, and meet critical community needs. Programs may include affordable home mortgages, home improvement loans, and home buyer education.

Issue 5. Need for More Affordable Housing Community Awareness and Homebuyer Education

Many residents of Gwinnett County hold misperceptions of affordable housing and are not aware of the critical needs in the county. Homebuyer Education programs are growing, but need to be strengthened and expanded.

Responses: Increase Education and Awareness about Affordable Housing Issues

Gwinnett County will assist agencies and organizations which educate citizens and stakeholders in the affordable housing process. The homeowner education programs being carried out by The IMPACT! Group are being carried out, in part, with grant funds from HUD, and additional HUD grant funds awarded by Gwinnett County.

The County will work with The IMPACT! Group to provide a clearer understanding of affordable housing issues in Gwinnett County for lenders, realtors, builders and developers, homeowners associations, the general public, local officials, building inspectors, and civic organizations.

Other outreach will focus on issues such as informing the public about the need for affordable housing, reducing fears and resistance often put forth by neighborhood organizations which fear a reduction in their property values if affordable housing is constructed.

As development costs continue to rise, new approaches to affordable housing will be necessary. Techniques such as mixed-use development may help make such development more acceptable for all.

HOUSING PRIORITY ANALYSIS AND STRATEGY DEVELOPMENT

AFFORDABLE HOUSING

GOAL AH: Increase access to affordable housing for low and moderate-income persons.

I. Analysis

Affordability is a critical issue for low and very low-income households living in Gwinnett County.

A. Affordable Rental Housing

Affordable rental properties are critical to the stability of the community. At least one-third of the households cannot reasonably afford to purchase a home, and almost one-fourth cannot afford to rent decent housing.

More than three-fourths (76.9%) of all renters earning 0-30% of the median family income experience a cost burden for housing; that is, they pay more than 30% of their income for housing expenses. Two-thirds of them [67%] have a severe cost burden, paying more than 50% of their income for housing costs.

Very low-income renter households earning 31-50% of median family income face cost burdens also. Eighty-five percent (85%) of them experience a cost burden and 30% experience a severe cost burden.

Other low-income renters [earning 51-80% of the median family income] also experience housing affordability problems. Almost half of them (46.2%) report a cost burden, and 1.7% report a severe cost burden for housing costs.

There simply are not enough affordable rental units available in the Count. Large affordable rentals with three (3)-four (4) bedrooms, in particular, are too expensive for low-income families. At the same time, many apartment complexes are struggling to manage high vacancy rates. This mismatch in the market place results in overcrowding in some cases, deteriorating housing stock in others, and an increase in evictions and homelessness.

A higher percentage of elderly and large households have cost burdens in every income category.

B. Affordable Housing for Homeowners and First-Time Homebuyers

Most of the recent housing development in Gwinnett County has been for higher-priced homes. Escalating land and construction costs have priced the low- and moderate-income family out of the marketplace. The inventory of affordable homes for sale at less than \$150,000 is very small and is shrinking as housing costs rise.

Potential low- and moderate-income homebuyers often face the challenge of having enough cash at closing for the downpayment and closing costs. Credit is also an issue for many who live paycheck to paycheck and lack budgeting skills.

C. Obstacles

The County faces obstacles ranging from general NIMBY ["Not In My Back Yard"] attitudes to technical issues such as limited numbers existing nonprofit housing developers or private developers willing to construct affordable housing for low-income homebuyers. Financial resources are extremely limited to help nonprofits developers develop their internal capacity building and housing initiatives.

II. Strategy Development - Investment Plan [Activities and Programs]

Generally, Gwinnett County is using its resources to help those most in need. Affordable housing needs include homeownership opportunities and assistance, affordable rental units, and rental assistance. Downpayment assistance programs for first-time home buyers are a tool to help make housing more affordable. The primary activity employed to address affordable rental housing will be housing rehabilitation and neighborhood revitalization. The County will work with agencies to help them obtain rental rehabilitation assistance and to obtain rental assistance to reduce the cost burden for very low- and other low-income households. The County also provides technical assistance to nonprofits and for-profit developers working to build or rehabilitate affordable housing.

A. Strategy Implementation

1. Investment Plan [Activities and Programs for Each Priority]

(a) Programs and Resources:

Gwinnett County CDP Program uses several resources to help meet the goals of the Consolidated Plan, including Federal programs, state and local programs, and collaborations with private sector sources. Specifically for homebuyer programs, Gwinnett County makes use of or encourages the use of the following programs:

- HUD's CDBG program;
- HUD's HOME Program;
- HUD's American Dream Downpayment Initiative [ADDI]
- Gwinnett County Habitat for Humanity;
- Local Financial Institutions;
- The IMPACT! Group;
- Private real estate developers;
- Federal Home Loan Bank [for member banks]; and Georgia DCA Homeowner Programs.

(b) Plan for Leveraging Private and Non-Federal Funds:

Gwinnett County is committed to leveraging all resources to the greatest extent possible. For example, the County is working with financial institutions to provide mortgages for this target market. The HOME Program-financed Downpayment Assistance Program [HomeStretch] is administered by the County and provides a second mortgage loan. The County provides CDBG Housing Counseling funds to help fund the homebuyer/homeowner education associated with the HomeStretch Program.

Gwinnett County, through its local CHDO (The IMPACT! Group) and other HUD-Certified Housing Counseling Agencies, is working with credit counseling services to promote credit counseling and homebuyer education to help residents prepare for Home ownership. The County plans to increase partnership efforts with local lenders to provide home mortgage credit to more low- and moderate-income potential homebuyers.

Through the education program and the creative financial techniques, the county will aid homebuyers who otherwise would continue to rent because of traditional underwriting criteria. The move of these households to Home ownership will free up affordable rental units to other needy households.

(c) Matching Requirements:

There are no matching requirements for any of the homebuyer programs, except the HOME Program (25% match). The value of the property financed is such that the matching funds are readily available. Gwinnett County is working with financial institutions to develop collaborative programs which will positively leverage the investment of public resources.

(d) Categories of Residents to be Assisted: Very low-income, Low-income, and Moderate-income households of all sizes, based on need.

(e) Plan Period Goals:

For the period 2009-2013, Gwinnett County and private organizations plan to assist residents in the following target groups. All target income groups include elderly and persons with disabilities.

(i) Very Low-Income

Habitat for Humanity of Gwinnett plans to build one new neighborhood in which it will construct between 4 and 12 homes for very low-income families. The development plan will be adjusted according to the buildability/permittability of the site. Other scattered site construction of new homes will include 13 new homes. Habitat will provide HOME Program downpayment assistance to 25 families, including serving the following estimated households: 10 Black/African-American; 10 White/Non-Hispanic; and, 5 White/Hispanic.

(ii) Low-Income

The Downpayment/Closing Cost Assistance Program will serve 10 low-income households, including serving the following estimated households: 7 Black/African-American; 2 White/Non-Hispanic; and, 1 White/Hispanic.

(iii) Moderate-Income

The HomeStretch Downpayment/Closing Cost Assistance Program will serve 50 moderate-income households, including serving the following estimated households: 30 Black/African-American; 15 White/Non-Hispanic; and, 5 White/Hispanic.

(f) Geographic Distribution of Services:

Gwinnett County Habitat for Humanity and The IMPACT! Group programs work countywide. Residents in low-and moderate-income areas, however, are targeted through marketing and outreach efforts.

Through the education program and creative financial techniques, Gwinnett County will aid homebuyers who otherwise would continue to rent because of traditional underwriting criteria. The move of these households to Home ownership will free up affordable rental units to other needy households.

(g) Service Delivery and Management:

Gwinnett County works closely with participating financial institutions and realtors in the Downpayment Assistance Program to ensure the target groups are being served. Primary mortgage loans are made by the private lenders.

The County also works with the Gwinnett County Habitat for Humanity to enable Habitat to construct homes for very low- and low-income households.

(h) Resources

The expected resources to be available to address the needs identified in the Consolidated Plan are

described below. A. Federal Programs

Gwinnett County and its development community (both nonprofit and for-profit) aggressively pursue federal and state resources, as depicted in the following chart, to assist in the production and maintenance of affordable housing.

FEDERAL RESOURCES

PROGRAMS	ACQUIRE	REHAB	NEW CONSTRUCTION	HOME-BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENT.
HOME	X	X	X	X			
ADDI				X			
CDBG		X				X	
SECTION 8					X		
SECTION 8 MOD. REHAB		X					
SECTION 811			X				
SECTION 202			X				
ESG PROGRAM						X	X
FEMA							
SUPPORTIVE HOUSING						X	
HOPWA						X	X
LOW-INCOME HOUSING TAX CREDIT		X	X				

B. Non-Federal Resources

Resources from private and non-federal public sources which are reasonably expected to be made available to address the needs identified in the Plan are included in this matrix. The manner in which federal funds will leverage those additional resources is also presented, including a description of how matching requirements of the HUD Program will be satisfied.

NON FEDERAL RESOURCES

	ACQUIRE	REHAB	NEW CONST.	HOME-BUYER ASSIST.	RENTAL ASSIST.	HOME-LESS ASSIST.	HOME-LESS PREVENT.
LIHTC (LOW INCOME HOUSING TAX CREDIT)	X	X	X				
1ST TIME HOME BUYER PROGRAMS				X			
SECONDARY MARKET	X	X	X				

PRIVATE RESOURCES

FOR-PROFIT

	ACQUIRE	REHAB	NEW CONSTRUCTION	HOME BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENT.
BANKS	X	X	X	X			
FEDERAL HOME LOAN BANK AFFORDABLE HOUSING PROGRAM	X	X	X				

Federal Home Loan Bank Affordable Housing Program

The Affordable Housing Program awards low-cost financing on a competitive basis for affordable housing projects through its Community Investment Program. The CIP provides low-cost funds to member lending institutions for terms of one month to 20 years. These funds can be used for affordable housing projects and serve as an important source of private financing.

Activities are not yet into the development stages in Gwinnett County at this time, but the feasibility of such ventures will be evaluated and perhaps implemented during each of the years during the 2009-2013 Plan period.

NON-PROFIT

	ACQUIRE	REHAB	NEW CONST.	HOME-BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENTION	CAPACITY BUILDING
FOUNDATIONS	X	X	X	X	X	X	X	X
LOCAL CDC/CHDO	X	X	X	X		X	X	
MACF						X		X
FOUNDATION FOR NORTHEAST GEORGIA						X	X	X
UNITED WAY								X

Metropolitan Atlanta Community Foundation (MACF)

MACF, in its original trust form, was developed in 1951 by the City of Atlanta's four major banks to serve a variety of donors and has grown to become the 15th largest community foundation in the country with assets of over \$100 million. MACF was established as a non-profit vehicle for philanthropy, and pools funds to provide grants to support various causes including housing initiatives and capacity building of non-profit organizations in the 19-county metropolitan Atlanta area. Many of the MACF recipients also receive Federal, State, and other local grants which are leveraged with these private funds to support their initiatives.

Foundation for Northeast Georgia

This organization was formerly known as the Gwinnett Foundation. It makes small awards to non-profit organizations, largely for operating costs.

SUBSTANDARD HOUSING

GOAL HR: Eliminate substandard housing for low- and moderate-income individuals, families, and households.

I. Analysis

Gwinnett County has aging owner-occupied and rental properties. Many of the older units are in need of repair; but they also tend to be occupied by those least able to pay for such repairs. Because the County is a growth area, most middle- and upper-income people live in newer units.

Older units, which were built under less stringent building and energy codes, are generally more expensive to maintain than newer homes. They generally require more repair, and therefore, present a cost burden to low-income residents.

A. Owner-occupied Housing Needs Rehabilitation

Very low-income households who own their own homes overwhelmingly report housing problems. Almost (70%) reported housing problems of some kind [in need of repairs, overcrowding, cost burden, severe cost burden]. Some 68% of all very low-income homeowners reported a cost burden to maintain their homes (they pay more than 30% of their income for housing costs). Among those in the lowest income category (0-30% of median family income) 58% of them have a severe cost burden to remain in their homes. Almost 40% of those earning 31-50% of the median family income reported a severe cost burden.

Other low-income homeowners (those earning 51-80% of median family income) experienced housing problems, too. More than one half (57%) reported housing problems, with 53% experiencing a cost burden and 12.5% experiencing a severe cost burden.

B. Obstacles: Insufficient Funding

The chief obstacle to eliminating substandard housing is funding. Because the County is responsible for a large land area, programs operate on a countywide basis, the demand for federal funds (i.e., HOME and CDBG) is spread throughout the community and the results of housing improvements is scattered. Support for enhanced capacity of local community housing development organizations (CHDO's) and other nonprofits can result in greater impact in targeted areas.

C. Code Enforcement

Historically, Gwinnett County has focused more on new housing construction. However, beginning in 2005, the County has moved aggressively to begin code enforcement on existing housing units. This effort will be continued and expanded during the Plan period.

II. Strategy Development - Investment Plan (Activities and Programs)

Gwinnett County operates several programs to address substandard housing. Housing rehabilitation programs are the primary activities planned. Programs include emergency home repairs and rehabilitation of housing. The HUD grant [CDBG and HOME Program] funded programs are described in this section of the Plan and in the respective annual Action Plans for each of the years of the Plan period.

A. Strategy Implementation

1. Investment Plan (Activities and Programs for Each Priority)

Provide opportunities for bringing Gwinnett's existing substandard housing stock up to minimum property standards -- owner-occupied and rental housing.

(a) Programs and Resources:

Gwinnett County uses several resources to help meet the goals of the Consolidated Plan, including Federal programs, state and local programs, and collaborations with private sector sources. Specifically for the programs addressing substandard housing, Gwinnett County makes use of the following programs:

- (1) HUD's CDBG Program
- (2) HUD's HOME Program

Homeowner Housing Rehabilitation

The County use deferred loans and grants in its homeowner housing rehabilitation program. Families are qualified by income, equity, and other qualification factors to determine whether loans or grants are used for their respective rehabilitation.

Under the homeowner housing rehabilitation program, approximately 150 homes will be rehabilitated during the Plan period.

Rental Housing Rehabilitation

The IMPACT! Group is currently the only non-profit housing CDC/CHDO in Gwinnett County which owns affordable rental housing [approximately 250 garden apartments and townhouses]. During the Plan period, The IMPACT! Group will operate these units as affordable housing in accordance with the funding requirements of programs which provided monies to acquire and/or rehabilitate these rental units.

(b) Matching Requirements:

The only matching requirement is for the HOME Program, which requires a 25% match for rehabilitation activities. Gwinnett County is able to utilize the matching value from other HOME-funded activities to generate matching funds for the rehabilitation program.

Categories of Residents to be Assisted: Very low-income, Low-income, Moderate-income, Elderly, and Handicapped households of all household sizes, based on need.

Plan Period Service Goals by Income Group:

For the Plan period, Gwinnett County plans to assist residents in the following target groups:

Very Low-Income (HUD requires 50% or less MFI):

The Homeowner Rehabilitation Program estimates that it will serve 30 households. Approximately 10 of these households will be elderly and 5 disabled, , including serving the following estimated households: 15 Black/African-American; 10 White/Non-Hispanic; and, 5 White/Hispanic.

Low-Income [HUD requires 51% - 80% MFI]:

The Homeowner Rehabilitation Program estimates that it will serve 120 low-income households, 30 of which will be elderly and 5 disabled, , including serving the following estimated households: 80 Black/African-American; 35 White/Non-Hispanic; and, 5 White/Hispanic.

2. Geographic Distribution of Services:

The Housing Rehabilitation Program operates countywide, but efforts are also made to targeted to needy areas in Gwinnett County where substandard housing is prevalent and to the Gwinnett County designated Revitalization Areas. While the County responds to individual requests for assistance, attention is paid to neighborhoods or developments where several units are in need of rehabilitation or repair. The community impact is greatly enhanced when broad improvements are evident in the community.

Specific targeted efforts in Housing Rehabilitation will be carried out during the Plan period in the Liberty Heights Community and in the older cities of the County [Buford, Lawrenceville, and Norcross].

The IMPACT! Group will continue its efforts to complete the rehabilitation of its multi-family properties in the Norcross area.

3. Service Delivery and Management:

All of the programs identified in this description will be managed by the Gwinnett County Community Development Program, administered by W. Frank Newton, Inc., under the direction of the Gwinnett County Department of Financial Services. Rehabilitation work is contracted by homeowners with county-approved rehabilitation contractors. The Gwinnett County Community Development Program provides technical assistance to homeowners to assist them with the Rehabilitation process.

The County and its development community (both nonprofit and for-profit) aggressively pursue federal and state resources, as depicted in the following chart, to assist in the production and maintenance of affordable housing.

4. Resources

A. Federal Resources

FEDERAL RESOURCES

	ACQUIRE	REHAB	NEW CONSTRUCTION	HOME-BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENT.
HOME	X	X	X	X			
CDBG	X	X		X		X	
LIHTC		X	X				

Resources from private and non-federal public sources which are reasonably expected to be made available to address the needs identified in the plan are included in this matrix. The manner in which federal funds will leverage those additional resources is also presented, including a description of how matching requirements of the HUD Program will be satisfied.

B. Non-Federal Resources

Non-federal resources are those unscheduled loan repayments from previous housing rehabilitation loans [CDBG/HOME/ADDI] made to low and moderate-income homeowners by Gwinnett County. These loan repayments are Program Income and are used for eligible activities under each program, as applicable.

PRIVATE RESOURCES

FOR-PROFIT

	ACQUIRE	REHAB	NEW CONST.	HOME - BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENT.
BANKS		X					
FEDERAL HOME LOAN BANK AFFORDABLE HOUSING PROGRAM		X					

Federal Home Loan Bank Affordable Housing program

Affordable Housing Program: The Affordable Housing Program awards low-cost financing on a competitive basis for affordable housing projects. The AHP Community Investment Program: The CIP provides low-cost funds to member institution for terms of one month to twenty (20) years. These funds can be used for affordable housing projects and serve as an important source of private financing.

Activities are not yet into the development stages in Gwinnett County at this time, but the feasibility of such ventures will be evaluated and perhaps implemented during the Plan period.

NON-PROFIT

	ACQUIRE	REHAB	NEW CONST.	HOME-BUYER ASSIST.	RENTAL ASSIST	HOMELESS ASSIST.	HOMELESS PREVENT.	CAPACITY BUILDING
GHRP	X	X	X					

Special Needs Housing

GOAL SNH: Increase Housing and Supportive Services for Individuals and Families with Special Needs.

I. Analysis

Persons with special needs include the elderly, persons with AIDS, persons with severe mental illness, persons with alcohol and/or other drug addiction, single parents and others. Unfortunately, affordable housing and supportive housing for persons with special needs is extremely limited in the county.

Housing with support services [e.g., day care for single parents, nearby health care for elderly] and residential treatment centers have not emerged to meet the growing demand for their services. Long term and permanent facilities are needed for elderly, frail elderly, persons with mental illness, persons with developmental and physical disabilities, and those with alcohol or other drug addiction.

Such facilities should include transitional housing, single room occupancy units, intermediate care, residential treatment/care facilities, and affordable single- and multi-family structures. Health and social services support should be made available with all supportive housing facilities and referrals to ensure wellness, full recovery and/or curtail recidivism.

A. Obstacles

The chief obstacle to providing services can be partially attributed to the lack of federal and state support for programs which address housing needs of persons with special needs. Private sector involvement in this area will be increased only with subsidies or incentives from the government.

II. Strategy Development - Investment Plan (Activities and Programs)

Gwinnett County will work with nonprofits or others seeking to build or expand facilities to serve special needs populations. This will include strengthening nonprofit organizations in their operational and developmental skills. It will also include seeking additional resources which can be passed to nonprofit organizations for development of special needs housing.

A. Strategy Implementation Investment Plan (Activities and Programs for Each Priority):

1.

a. Programs and Resources:

Gwinnett County CDP Program uses several resources to help meet non-homeless special housing needs including Federal programs, state and local programs, and collaborations with private sector sources. Specifically for the programs listed above, Gwinnett County makes use of the following programs:

- (1) HUD's Section 8 Program, which is administered by the State of Georgia, Department of Community Affairs (DCA);
- (2) HUD HOP WA Program;
- (3) HUD Section 811 Program;
- (4) HUD Section 202 Program

b. Plan for Leveraging Private and Non-Federal Funds:

Gwinnett County is committed to leveraging all resources to the greatest extent possible. For example, the County works with HUD and, when possible, the State of Georgia to provide direct assistance to these target groups.

c. Matching Requirements:

There are no matching requirements with these programs.

d. Categories of Residents to be Assisted

Very Low-Income, Homeless, Elderly, Persons with Disabilities.

e. Plan Period Service Goals:

For the 2009-2013 period, HUD will provide PHA funds to Local PHA's in Gwinnett County plans to assist residents in the following target groups:

(i) Very Low-Income Public housing units in

Norcross, Lawrenceville, and Buford:

Buford Housing Authority - 186 units for very low- and low-income residents
Norcross Housing Authority - 44 units for low and moderate-income persons.
Lawrenceville - 212 units - for low and moderate-income residents.

(ii) Elderly

The Buford Housing Authority will serve 87 elderly residents.
The Norcross Housing Authority will provide at least two (2) units for elderly residents.

The Christian Towers II is a private development under construction which recently received Section 202 funds to provide 125 units for elderly residents.

The Center for Pan Asian Community Services will operate its 50 units of Section 202 housing for elderly in South Gwinnett County.

(iii) Persons With Disabilities

The Lilburn Terrace Apartments will provide forty (40) one (1) bedroom units to the mobility impaired adults.

The Wiloaks apartments has eight (8) handicapped units.

Annandale at Suwanee, Inc will serve 87 people with the primary diagnosis of development disability, mental retardation, head injury, and borderline or decreased mental ability.

United Cerebral Palsy of Atlanta constructed 8 units of Section 811-assisted housing in Snellville in 1997. No loss of Section 202 or Section 811 units is expected during the plan period.

HOPWA assistance, if awarded, is estimated to provide housing for 50 very low-income and 50 low-income individuals who have HI V/AIDS.

No loss of public housing units is expected during the plan period.

2. Geographic Distribution of Services:

The Rental Assistance efforts under this priority will be targeted to areas with the greatest identified very low-income populations in Gwinnett County including the areas around Norcross, Buford, and Lawrenceville.

Gwinnett County lacks sufficient decent affordable rental housing stock for very low- and low-income households. Until more affordable housing is created, rental assistance is critical for a growing number of Gwinnett County residents.

3. Service Delivery and Management:

The Local Public Housing Authorities manage their respective public housing units.

Services to the elderly and handicapped will be provided through HUD's Section 202 and Section 811 programs, if funding becomes available. Gwinnett County invites HOME Program applications from organizations which propose to construct housing which will serve Special Needs populations during any year of the Plan period.

4. Resources

The expected federal resources to be available to address the needs identified in the Consolidated Plan are described below.

A. Federal Programs

Gwinnett County and its development community (both nonprofit and for-profit) aggressively pursue federal and state resources, as depicted in the following chart, to assist in the production and maintenance of special needs housing.

FEDERAL RESOURCES

	ACQUIRE	REHAB	NEW CONSTRUC -TION	HOME- BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENT.
HOME	X	X	X				
CDBG	X	X					
SECTION 8					X		
SECTION 811			X		X		
SECTION 202			X		X		

Resources from private and non-federal public sources which are reasonably expected to be made available to address the needs identified in the plan are included in this matrix. The manner in which federal funds will leverage those additional resources is also presented, including a description of how matching requirements of the HUD Program will be satisfied.

B. Non-Federal Resources

NON FEDERAL RESOURCES

No other non-federal resources are identified at this time to fund Special-Needs Housing.

PRIVATE RESOURCES

FOR-PROFIT

	ACQUIRE	REHAB	NEW CONSTRUC -TION	HOME BUYER ASSIST.	RENTAL ASSIST.	HOMELESS ASSIST.	HOMELESS PREVENT.
Banks	X	X	X				

COORDINATION OF HOUSING ACTIVITIES

Gwinnett County will coordinate services between agencies providing housing resources, assisted housing providers and health, mental health and service agencies by enhancing existing coordination mechanisms and developing new relationships. This process will include the following efforts:

1. Gwinnett County will assist the Gwinnett Health and Human Services Coalition in its role of coordinating existing social services and new program development between organizations. Gwinnett will help the Coalition inform additional private non-profit organizations and government agencies on the role which the Coalition carries out in Gwinnett County. The CD Program Office works with all local municipalities and Gwinnett County departments, and can serve to link these entities with the Coalition;
2. Gwinnett County will encourage public-private partnerships between private developers, non-profit housing organizations, and local human services organizations. These partnerships will be aimed at developing affordable housing which best meets the needs of low-income Gwinnett residents, and which helps link supportive services with affordable housing as it is developed. Such efforts will focus on identifying prospective tenants or home buyers and ensuring that they receive the services needed for successful participation in appropriate housing;

3. Gwinnett County will work with the local Public Housing Authorities (PHA) to develop housing options for PHA residents, such as first time homebuyer programs;
4. Gwinnett County will assist The IMPACT! Group, Initiative for Affordable Housing, and any additional organizations designed as Community Housing Development Organizations in their roles as CHDO's and as developers/owners of affordable housing for low and moderate-income persons. This will include helping them: serve as a housing counseling agencies and fair housing agencies, and to strengthen and support for homebuyer assistance, affordable rental housing, special needs housing, and the homeless assistance programs they carry out.
5. Gwinnett County will work with state agencies, such as Georgia Department of Community Affairs (DCA), to link state resources with local organizations such as The IMPACT! Group and Gwinnett County Habitat for Humanity to develop more affordable housing.
6. Gwinnett County will continue its Fair Housing activities by updating its Analysis of Impediments to Fair Housing Choice following the completion of the Consolidated Plan 2009-2013. In subsequent years of the Plan period, Gwinnett County will use HUD grant funds to fund activities which implement the Action Plan recommended in the new A.I.

COMMUNITY DEVELOPMENT
[NON-HOUSING COMMUNITY DEVELOPMENT PLAN]

The Community Development section of the Gwinnett County Consolidated Plan 1998-2005 serves as the Non-Housing Community Development Plan, as required in the Consolidated Plan regulations at 24 CFR 91.215(e).

This component of the Consolidated Plan includes the following items:

1. Community Development Goal;
2. Long and Short Term Priority Objectives;
3. Community Development needs; and
4. Proposed strategies and accomplishments

GOAL: CD Increase the capacity of public facilities and public services to improve the social, economic, and physical environment for low- and moderate-income individuals and families by acquiring, constructing, or rehabilitating public facilities, revitalizing older areas of the County, providing equipment purchased through public services activities, and providing overall program administration and management.

Long Term Priority Objectives:

- CDPFLT** PUBLIC FACILITIES: To provide for the acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements to: (1) meet health and safety regulations, and (2) upgrade and maintain the viability of neighborhoods where low- and moderate-income families reside; and, (3) revitalize older areas of the County.
- CDPSLT** PUBLIC SERVICES: To provide the resources necessary to improve the community's public services, including, but not limited to, employment, crime prevention, childcare, physical and mental health, drug abuse, education, energy conservation, transportation, care for the elderly, welfare and recreational needs.
- CDADLT** ADMINISTRATION/PLANNING/MANAGEMENT: To provide the administrative structure to conduct community development, housing, and homeless activities by planning, implementing, monitoring and evaluating, community development, housing and homeless programs.

Short Term Priority Objectives:

- CDST1** To improve existing deteriorated public facilities and infrastructure in low- and moderate-income areas to meet health and safety standards, including but not limited to areas of the County where the physical condition of the public infrastructure and facilities need revitalization.
- CDST2** To construct new public facilities and infrastructure in low- and moderate-income areas now lacking such facilities, including but not limited to areas of the County where the physical condition of the public infrastructure and facilities need revitalization.
- CDST3** To construct, acquire, and/or renovate public facilities to meet the needs of special population groups such as the elderly, persons with disabilities, homeless persons, and persons suffering from various types of abuse.
- CDST 4** To provide funding, support, or technical assistance to assist in the implementation of programs for special population groups such as the elderly, persons with disabilities, homeless persons, and persons suffering from various types of abuse.
- CDST5** To provide funding, support, or technical assistance to private non-profit and public agencies meeting

the public service needs of the County's low and moderate-income population.

CDST 6 To encourage the development of and maximize the opportunities for minority and female-owned businesses.

CDST 7 To provide the administrative structure for the planning, implementation, and management of the Community Development Block Grant Program, the Emergency Shelter Grants Program, the HOME Program, the American Dream Downpayment Initiative, and other housing, community development and homeless programs.

Priority non-housing Community Development Needs are described presented in **Table 15** and are also summarized, with proposed performance measures in **Table 16**.

Table 15
(HUD Table 2B)
PRIORITY COMMUNITY DEVELOPMENT NEEDS

PRIORITY COMMUNITY DEVELOPMENT NEEDS	Priority Need Level High, Medium, Low No Such Need	Unmet Priority Need	Estimated Dollars To Address Unmet Priority Need	Multi-Year Goals	Annual Goals
PUBLIC FACILITY NEEDS (Projects)					
Senior Centers [03A]	H	2	\$5,000,000	1	1
Centers for Persons With Disabilities [03B]	H	2	\$500,000	1	1
Homeless Facilities [03 C]	H	1	\$6,000,000	1	1
Youth Centers [03D]	H	2	\$5,000,000	1	1
Child Care Centers [03M]	H	4	\$500,000	1	1
Health Facilities[03P]	H	2	\$12,000,000	2	1
Neighborhood Facilities [03E]	H	2	\$5,000,000	2	1
Parks and/or Recreation Facilities [03F]	M	3	\$300,000	1	1
Parking Facilities [03G]	M	2	\$100,000	2	1
Non-Residential Historic Preservation [16B]	N	0	\$0	0	0
Other Public Facility Needs [03]	N	0	\$0	0	0
Public Facilities Subtotal		20	\$34,400,000.00	12	9
INFRASTRUCTURE (Projects)					
Water/Sewer Improvements [03J]	H	5	\$5,000,000	2	1
Street Improvements [03K]	H	5	\$5,000,000	4	2
Sidewalks [03L]	H	5	\$3,000,000	4	1
Solid Waste Disposal Improvements [03H]	N	0	\$0	0	0
Flood/Drainage Improvements [03I]	H	3	\$5,000,000	2	1
Other Infrastructure Needs [03]	N	0	\$0	0	0
Infrastructure Subtotal		18	\$18,000,000.00	12	5
PUBLIC SERVICE NEEDS (People)					
Senior Services [05A]	M	4	\$1,500,000	500	100
Services for Persons With Disabilities [05B]	M	2	\$1,000,000	2,000	200
Youth Services [05D]	M	4	\$500,000	300	100
Childcare Services [05L]	M	4	\$500,000	200	75
Transportation Services [05E]	H	5	\$500,000	500	100
Substance Abuse Services [05F]	M	1	\$500,000	1,100	0
Employment Training [05H]	M	2	\$1,000,000	100	25
Health Services [05M]	H	2	\$500,000	20,000	20,000
Lead Hazard Screening [05P]	N	0	\$0	0	0
Crime Awareness [05I]	L	1	\$500,000	0	0
Other Public Service Needs [05]	H	0	\$375,000	1,500	300
Public Services Subtotal		26	\$6,600,000.00	28,100	20,900
ECONOMIC DEVELOPMENT					
ED Assist. to For-Profits (Businesses) [18A]	L	1	\$1,000,000	0	0
ED Technical Assistance (Businesses) [18B]	L	1	\$1,000,000	0	0
Micro-Enterprise Assist. (Businesses) [18C]	L	1	\$1,000,000	0	0
Rehab; Publicly- or Private-Owned Commercial/ Industrial (Projects) [14E]	N	1	\$1,000,000	0	0
Economic Development Subtotal		4	\$4,000,000.00	0	
PLANNING					
Planning [20]	H	1	\$100,000.00	1	1
Planning Subtotal		1	\$100,000.00	1	1
TOTAL ESTIMATED DOLLARS NEEDED			\$63,100,000		

TABLE 16
HUD Table 2C
Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)

HUD Obj Code #	Specific Activities/Objectives & HUD Matrix Code	Sources of Funds	Performance Indicators	Expected Number	Actual Number
	Rental Housing Objectives				
DH-2	Acquire/Rehabilitate Rental Units [14G]	HOME	# Rental Housing Units Brought to Standard Condition	36	
	Owner Housing Objectives				
DB-2	Rehabilitate Owner-Occupied Housing [14A]	CDBG/ HOME	# Homeowner Housing Units Brought to Standard Condition	75	
DH-2	Construct Affordable Owner-Occupied Housing [12]	HOME	# Affordable Homeowner Units Constructed	15	
DH-2	Downpayment Assistance to Homebuyers [13]	ADDI	# First-Time Homebuyers Receiving Downpayment Assist.	40	
	Community Development Objectives				
	<i>[See Infrastructure, Public Facilities, Public Services Objectives]</i>				
	Infrastructure Objectives				
SL-1	Water/Sewer Improvements [03J]	CDBG	# Persons With Improved Accessibility	2,000	
SL-1	Street Improvements [03K]	CDBG	# Persons With Improved Accessibility	6,000	
SL-1	Sidewalks [03L]	CDBG	# Persons With Improved Accessibility	6,000	
SL-1	Flood/Drainage Improvements [03I]		# Persons With Improved Accessibility	0	
	Public Facilities Objectives				
SL-1	Senior Centers [03A]	CDBG	# Persons With Improved Accessibility	500	
SL-1	Centers for Disabled Persons [03B]	CDBG	# Persons With Improved Accessibility	2,000	
SL-1	Homeless Centers [03C]	CDBG	# Persons With New Accessibility	3,000	
SL-1	Youth Centers [03D]		# Persons With New Accessibility	0	
SL-1	Child Care Centers [03M]	CDBG	# Persons With Improved Accessibility	200	
SL-1	Health Facilities [03P]	CDBG	# Persons With Improved Accessibility	500	
SL-1	Neighborhood Facilities [03E]		# Persons With Improved Accessibility	0	
SL-1	Parks and/or Rec. Facilities [03F]		# Persons With Improved Accessibility	100	
SL-1	Parking Facilities [03E]		# Persons With Improved Accessibility	200	
	Public Services Objectives				
DH-2	Public Services General [Housing Counseling] [05]	CDBG	# Persons With Improved Access	1,500	
SL-3	Senior Services [05A]	CDBG	# of Persons With Improved Access	400	
SL-3	Services for Persons With Disabilities [05B]		# of Persons With Improved Access	100	
SL-3	Youth Services [05D]		# of Persons With New Access	200	
SL-3	Childcare Services [05L]		# of Persons With Improved Access	200	
SL-3	Transportation Services [05E]		# of Persons With Improved Access	500	
SL-3	Substance Abuse Services [05F]		# of Persons With New Access	0	
SL-3	Employment Training [05H]		# # of Persons With New Access	0	
SL-3	Health Services [05M]	CDBG	# People With Improved Access	20,000	
SL-3	Lead Hazard Screening [05P]		# of People With Improved Access	0	
	Economic Development Objectives				
	None				
	Neighborhood Revitalization/Other Objectives				
	None				

	Outcome/Objective Codes		
	Availability/Accessibility	Affordability	Sustainability
<i>Decent Housing</i>	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

BARRIERS TO AFFORDABLE HOUSING

Barriers affecting non-housing community development often result from public policies which may not take into account their affect on low and moderate-income citizens. The strategy to remove these barriers is presented in the Housing Market Analysis. A continuous analysis must be performed throughout the period of this Plan to detect such barriers. Recommendations developed from the analysis will be utilized for each Action Plan to identify any changes in public policies necessary for the reduction or minimizing of these barriers.

LEAD-BASED PAINT HAZARDS

Actions are proposed to evaluate and reduce lead-based paint hazards. These actions are being integrated into Gwinnett County's housing and community development operating procedures.

Gwinnett County carries out two primary steps during the Consolidated Plan period to reduce lead based paint hazards: (1) Evaluation/assessment of the incidence of lead based paint hazards in Gwinnett; and (2) removal of such hazards once identified.

1. Currently, there is very little detailed information on the incidence of lead based paint in Gwinnett County, nor on the extent to which such incidence poses significant hazards. The incidence of lead based paint in Gwinnett is based on the age of the housing stock (see Strategic Plan - Other Housing Issues). However, this procedure is imprecise, and provides a limited base from which to carry out a lead removal program. Gwinnett County addresses lead-based paint on any housing which receives rehabilitation or downpayment assistance. Inspections of these homes are performed by certified Lead Risk Assessors, to ensure compliance with lead based paint regulations of the United States Department of Housing and Urban Development.

Gwinnett County is using HUD Grant funds [CDBG and/or HOME] to perform lead removal in dwelling units [homeowner or rental] being rehabilitated with its CDBG or HOME Program funds. Lead removal on rental rehabilitation projects is carried out with HOME Program and non-Federal funds.

2. During the development of Consolidated Plan 2009-2013, the Gwinnett County Health Department and the Gwinnett County Department of Family and Children Services [Georgia's "welfare" agency] were contacted about lead-based paint issues and case. Neither agency responded with a listing of clients who were suffering from elevated levels of lead in their blood.

ANTI-POVERTY STRATEGY

Described below are the goals, programs, and policies for reducing the number of poverty level households. Note that these overlap the goals program for producing and preserving Affordable Housing.

One approach to reducing the number of families and individuals who fall under the poverty level is to increase income. The primary method available for increasing income is employment placement, or upgrading employment for Seniors Citizens and for persons incarcerated in County correctional facilities. Such programs are currently underway in Gwinnett County.

A second approach to reducing poverty can be through reducing the cost of living for individuals and families under the poverty level. While not technically moving people over the official poverty line, this approach may have a similar effect. Activities such as reducing housing and utility costs can accomplish this effect. Gwinnett County will pursue such efforts as funding becomes available.

These two approaches to reducing poverty (increasing employment, and reducing living costs) are more fully described as follows:

A. Increasing Employment

Gwinnett County will work with private sector employers, and public and private human service organizations, to stimulate increased employment, both in terms of an increase in the absolute number of jobs available and the relative wage paid. This will be accomplished through the following efforts:

- Work with the Chamber of Commerce to attract new businesses and industries to Gwinnett County;
- Examine the job market in Gwinnett County to identify those job classifications which have the best potential for increasing earnings, particularly for entry level and moderate skill jobs which are reasonably accessible to low-income persons with job training;
- Work with local human service organizations and job development agencies to increase the variety and quality of job training programs; and
- Work with the Georgia Department of Labor Area Office to increase the flow of information to local service organizations so that individuals may be referred to available jobs, particularly jobs that offer under-employed persons the opportunity to move up the employment scale. Also, provide information useful in planning job training programs.

B. Reduce Living Costs

Gwinnett County will work with local human service organizations in efforts to reduce the costs of daily living, in effect assisting low-income families to reduce their level of poverty. This will be accomplished through the following activities:

- Strengthening the ability of local human service organizations to refer low-income clients among agencies for assistance and services. This will be accomplished by increasing the availability of information about resources and by improving communication among organizations;
- Assisting local organizations in accessing federal, state and private resources which can provide vitally needed services -- such as food, shelter and transportation;
- Increasing the availability of affordable housing for low-income families through a range of projects, such as renovation of deteriorating rental units, development of additional new housing units, and increasing the availability of housing for first time home buyers;

- Reducing acquisition and development costs for affordable housing units; and
- Encouraging housing development programs, especially programs implemented with public assistance (such as Housing Programs using CDBG and HOME Program funding), to incorporate job training opportunities as a part of their operations.

Gwinnett County will coordinate the above efforts with community programs and services by:

- Working closely with the Gwinnett Health and Human Services Coalition, which represents more than thirty human service organizations;
- Working with the Gwinnett Chamber of Commerce;
- Working with the Workforce Investment Act Program and its service providers in Gwinnett County, as well as the Georgia Department of Labor; and
- Initiating such interagency meetings as may be needed to focus efforts on special needs.

INSTITUTIONAL STRUCTURE

The Gwinnett County institutional structure, including private industry, non-profit organizations, and public institutions through which the County will carry out its Consolidated Plan is addressed here. The strengths and gaps in the delivery system are also assessed.

The Gwinnett County CDP, under the direction of the Department of Financial Services, serves as the lead in planning, monitoring, and coordinating the implementation of the county's Consolidated Plan and annual updates. Other public agencies focus on specific housing needs (e.g., the local public housing authorities).

The County is working toward improving the coordination of Gwinnett's approach to affordable housing issues. This section describes the activities and focus of each agency or organization type involved in affordable housing efforts in Gwinnett County.

Gwinnett County Community Development Program (CDP) - (Administered by W. Frank Newton, Inc.)

The use of the CDP as the County's lead for affordable housing, and the willingness of all major public and private housing agencies in the county to work through a coordinated system has improved the planning and implementation of affordable housing programs. The CDP plans the housing strategy, as approved by Gwinnett County, coordinates with nonprofits, and manages the CDBG program, the Emergency Shelter Grants program, the HOME program, and the American Dream Downpayment Initiative for the County. The CDP coordinates HOPWA program activities with the City of Atlanta.

CDP Staff Resources

Although the CDP has been and continues to be active in maintaining existing affordable housing to Gwinnett County residents, a need exists for increased resources in the form of specialized professional staff for the development of fair and affordable housing. In particular, additional staff is needed to study and plan for a more coordinated housing system and to seek resources to help other non-profit and for-profit organizations to help acquire, construct or rehabilitate housing for its occupancy by low and moderate-income persons.

Local Housing Authorities

The local Public Housing Authorities (PHA) operate public housing for Buford, Norcross, Lawrenceville and surrounding communities in Gwinnett County.

The most significant issues confronting the PHA's are four-fold:

1. The need for sufficient HUD or other funds to modernize all existing public housing units.

2. The need for more public housing units in the county, especially for senior citizens and the disabled.
3. The need for more Section 8 certificates and vouchers.

The resources to meet these needs are beyond the county's control, and are available only from HUD. Too few Section 8 certificates are now available to meet demand. Georgia DCA maintains a long waiting list of Section 8 applicants.

STATE AGENCIES

Supportive services in Gwinnett County are provided by the Department of Family and Children's Services, the Health Department, the Department of Labor, the FEMA Emergency Food and Shelter Program, and the Partnership for Community Action. The funding for these agencies is inadequate for the needs they are expected to meet in Gwinnett County.

NONPROFIT ORGANIZATIONS

A few nonprofits provide immediate assistance to the homeless, very-low, and low-income individuals and families in terms of emergency shelter, transitional housing, and human service referrals. They serve a critical function in the delivery of housing to the needy in the County, but they lack the resources and capacity to adequately meet the growing numbers of people requiring their assistance.

Gwinnett Coalition for Health and Human Services

The mission of the Gwinnett Health and Human Services Coalition is to maximize the effectiveness of social service resources in Gwinnett by:

1. Facilitating linkage, coordination, and collaboration of social service providers;
2. Facilitates ongoing planning involving public and private sectors;
3. Provision of a centralized information and referral system; and
4. Maintenance of a need and service database to assist continued comprehensive planning efforts

The Coalition has a Helpline referral system for people needing a variety of services including housing, health care, jobs, job training, and childcare. The Coalition works with the County to provide timely data which will be helpful in identifying people needing immediate shelter and affordable housing.

Community-Based Development Organizations

A critical gap in the delivery system of affordable housing in the county is insufficient development capacity. Gwinnett has one Community Housing Development Organization (CHDO) located in the County. which utilizes HOME and other funds for new construction, acquisition, and rehabilitation of housing for affordable uses and to house the homeless. This CHDO is The IMPACT! Group [formerly the Gwinnett Housing Resource Partnership, Inc. (see below)]. A second CHDO, Initiative for Affordable Housing, Inc. was designated June 1, 2004, but has not yet proposed a specific project to Gwinnett County.

The IMPACT! Group [Formerly Gwinnett Housing Resource Partnership, Inc.]

This non-profit agency serves as the County's CHDO and leading non-profit facilitator of affordable housing. The agency was created from the reorganization of the Community Housing Resource Board and the Homelessness Committee of the Coalition to provide greater emphasis on affordable housing needs and fair housing issues in the county. The IMPACT! Group is seeking to serve a broad spectrum of affordable housing needs including emergency shelter, transitional housing, affordable rentals and cooperatives, and Home ownership. The agency acquired a HUD-owned 196 unit multi-family rental property, and provides services under the Emergency Shelters Grant program, and is a lead agency in the Gwinnett Coalition for Health and Human Services.

Gwinnett County Habitat for Humanity

The only local nonprofit new housing developer at this time is Gwinnett County Habitat for Humanity. Gwinnett County Habitat currently builds new housing for low income homebuyers who are to participate in the construction of their home and/or in the construction of the homes of other Habitat homebuyers. Habitat uses private donations and some funds from the Gwinnett County HOME Program.

GOVERNMENTAL COORDINATION

Gwinnett County is the local government in the County taking the most active role in affordable and fair housing. Although three cities (Buford, Lawrenceville, and Norcross) have public housing authorities, these organizations are almost solely focused on the operation and maintenance of their rental housing.

The primary promoters and developers of affordable housing in Gwinnett County are:

Gwinnett County [Financial Services Department/Community Development Program]; Gwinnett Housing Resource Partnership; Habitat for Humanity; and Gwinnett Coalition for Health and Human Services

Gwinnett County provides HUD grant funds (CDBG, HOME, and ESG) to GHRP and Habitat to promote the acquisition, construction and rehabilitation of fair and affordable housing for low and moderate-income persons.

Gaps in the Housing Delivery System for Low and Moderate-income Persons

Opportunities for Improving Institutional Cooperation

Overall, the institutional structure for delivery of affordable housing in Gwinnett County can be improved with the following:

- Stronger planning, coordination, and implementation systems among agencies.
- Capacity enhancement of the CDP to expand programs/services.
- Increased funding for Public Housing Improvements.
- Increased rental assistance through the Section 8 Program.
- Increased financial resources for agencies and nonprofit organizations currently delivering critical housing and supportive services.
- Support for the Gwinnett County CHDO's to construct, acquire, and/or rehabilitate existing, and develop (also promote education) new, affordable housing stock -- both owner-occupied and rental units.
- Support for creation of additional nonprofit housing organizations to serve as sponsors for the acquisition, construction or rehabilitation of affordable housing.
- Aggressive code enforcement to help preserve the affordable housing stock.
- Additional funding and attention to revitalizing older areas of the County.

PUBLIC HOUSING RESIDENT INITIATIVES/PUBLIC HOUSING NEEDS

Activities to encourage public housing residents to become more involved in management and participate in home ownership are described here.

Lawrenceville Housing Authority

The LHA has active Resident Associations in its housing communities. Their input is sought on issues relating to management, housing maintenance, and programs for residents.

Buford Housing Authority

The BHA encourages the residents of its housing to become more involved in the management of its properties and programs for residents. Resident Associations are active in the BHA housing developments. BHA provides support and financial assistance to the Associations to develop their capabilities and co-sponsor resident activities. The residents' input is sought on ways to improve the conditions and environment of the public housing. Resident representatives are encouraged to attend all BHA Board meetings. BHA participates in Workforce Investment Act to provide training and skills to residents.

Norcross Housing Authority

The NHA has a small number of units, with the majority of residents being families with children. Resident input is solicited through meetings with residents.

Gwinnett County consults with these three public housing authority during the development of Consolidated Plans, Action Plans or amendments to ensure that the needs of these PHA's and their residents are reflected in the Consolidated Plan or Action Plans. Each of the PHA's was contacted to obtain this information. Only the Housing Authority of the City of Lawrenceville responded to Gwinnett County's request for information. [See Tables 32-34.]

PERFORMANCE MEASUREMENT

Gwinnett County is implementing the **Performance Measurement System for Community Planning and Development Formula Grant Programs**, published in the Federal Register on March 7, 2006, by revising this document to include the newly required performance measures and data tables.

The Performance Measures system will now include the reporting of "output" measures, such as the number of persons served, numbers of houses rehabilitated, etc., but will also contain "outcome" measures which help establish the long-term benefits gained through the investment of HUD CPD Formula Grant funds by Gwinnett County and other Entitlement grantees throughout the nation.

Gwinnett County includes this new HUD-adopted performance evaluation system in this Consolidated Plan and in each respective Action Plan, as the measures apply to all activities being carried out with HUD Entitlement grant funds awarded to Gwinnett County by HUD.

APPENDICES

APPENDIX 1
HUD CERTIFICATIONS

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing - The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan - It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace - It will or will continue to provide drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing and ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplaces;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Make a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1,2,3,4,5 and 6. Anti-Lobbying - To the best of the jurisdiction's knowledge and belief:
 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing

or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

[Maria Woods]

Date

Acting Director, Gwinnett County Department of Financial Services

Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 9 1.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate-income. [See 24 CFR 570.2 and 24 CFR part 570].

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD. **Use of Funds --** It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available).
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2006-2008 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate-income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income [not low-income] families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstration; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with the title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint-- Its notification, inspection, testing, and abatement procedures concerning lead-based paint will comply with the requirements of 24 CFR 570.608;

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

[Maria Woods]

Date

Acting Director, Gwinnett County Department of Financial Services

Title

HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.2 14.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Signature/Authorized Official

[Maria Woods]

Date

Acting Director, Gwinnett County Department of Financial Services

Title

Certifications

The Emergency Shelter Grantee certifies that:

Major rehabilitation/conversion -- It will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 10 years. If the jurisdiction plans to use funds for purposes less than tenant-based rental assistance, the applicant will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 3 years.

Essential Services -- It will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure as long as the same general population is served.

Renovation -- Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services -- It will assist homeless individuals in obtaining appropriate supportive services, including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living, and other Federal, State, local, and private assistance.

Matching Funds -- It will obtain matching amounts required under section 576.71 of this title.

Confidentiality -- It will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project except with the written authorization of the person responsible for the operation of the shelter.

Homeless Persons Involvement -- To the maximum extent practicable, it will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, operating facilities, and providing services assisted through this program.

Consolidated Plan -- It is following a current HUD-approved Consolidated Plan or CHAS.

Discharge Policy Certification -- It has developed a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

HMIS -- It will comply with HUD's standards for participation in a local Homeless Management Information system and the collection and reporting of client-level information.

Signature/Authorized Official [Maria Woods] Date

Acting Director, Gwinnett County Department of Financial Services

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies. (This is the information to which jurisdictions certify.)
4. For grantees who are individuals, Alternate II applies. (Not applicable to jurisdictions.)
5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
2. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Gwinnett County Community Development Program (Administered by W. Frank Newton, Inc.)
575 Old Norcross Road, Suite A
Lawrenceville, GA 0045-4367 [Gwinnett County, GA]

Gwinnett County Department of Financial Services
Gwinnett Justice and Administration Center
75 Langley Drive
Lawrenceville, GA 3 0045-6900 [Gwinnett County, GA]

Check ____ if there are workplace on file that are not identified here; The certification with regard to the drug-free workplace required by 24 CFR part 24, subpart F.

9. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act

(21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of *nolo contendere*) imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces)

EXECUTIVE ORDER 12372 REVIEW DOCUMENTATION

Executive Order 12372 requires that any projects proposing an expenditure of Federal funds for water and sewer construction be reviewed by State [Georgia] and regional [Atlanta Regional Commission] authorities for consistency with State and regional plans and policies.

Gwinnett County complies with the E.O. 12372 review requirements for all water/sewer activities which are funded from any Action Plan submitted during the Plan Period.

APPENDIX 2
MONITORING PROCESS

MONITORING PROCESS

The Gwinnett County has established monitoring standards consistent with the federal guidelines for each HUD program it administers directly [CDBG, HOME/ADDI, and ESG Programs]. Monitoring procedures are described in the separate Operating Procedures for each of these respective programs.

Gwinnett County also reviews applications for other programs which require consistency with the Consolidated Plan. These federal programs include: HOME Program, CDBG, Shelter Plus Care Program, Supportive Housing for the Elderly (Section 202), Supportive Housing for Persons with Disabilities (Section 811), Emergency Shelter Grants Program, Supportive Housing Program, Shelter Plus Care Program, Moderate Rehabilitation Single Room Occupancy Program, and Housing Opportunities for Persons with AIDS (HOPWA) Program.

Monitoring Procedures

The monitoring procedures are detailed in the three Operating Procedures Manuals [CDBG, HOME/ADDI, ESG]. The monitoring is carried out using a risk-assessment process to determine whether monitoring will be: on-site or desk-reviews. Monitoring involves a five-step process to ensure that all statutory and regulatory requirements are being met. Individual programs (CDBG, HOME, and ESG) have Operating Procedures which provide additional details, procedures, forms used to carry out monitoring of organizations/activities receiving these grant funds.

Gwinnett County is responsible for:

1. Monitoring organizations and programs which use federal funds awarded by Gwinnett County. Reports are made on a regular basis, as required by the appropriate federal program regulations. The County checks the records of organizations receiving federal funds from Gwinnett County to ensure the information is reported accurately and completely.
2. Collecting data and reviews data to ensure consistency with the Consolidated Plan. The County reviews the number and types of households served with federal funds and analyze leveraging and matching sources.
3. Making visits to each subrecipient organization to check records and visits to projects, as appropriate.
4. Using a system of checklists and documentation for HUD-funded projects. Site visits to projects and reviews of project documentation are geared to ensure compliance with regulations and agreements.
5. Utilizing a system of notification to agencies or organizations when an instance(s) of non-compliance with federal regulations or County policies has been determined. The County notifies the agency or organization responsible and proceeds according to the established policies and procedures set forth by federal regulations and County policy.

Gwinnett County has created its Monitoring Instruments to be consistent with those by HUD in its monitoring of Gwinnett County's Entitlement Grant programs [CDBG, HOME, ADDI and ESG]. HUD's documents are contained in the CPD Monitoring Handbook.

APPENDIX 3

**COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
NATIONAL OBJECTIVES**

NATIONAL OBJECTIVES

The proposed objectives, strategies, and all funding contained in this plan will be undertaken in accordance with Title I of the Housing and Community Development Act of 1974, as amended, and must principally benefit low and moderate income persons. No activities will be undertaken under this Plan which do not benefit predominantly low and moderate income persons.

The United States Department of Housing and Urban Development publishes maximum household income tables annually, which determine eligibility for the CBDG, HOME, and American Dream Downpayment Initiative grant programs. Maximum household income from all persons over 18 years of age living in the home may not exceed 80 percent of Median Family Income for the Atlanta, Georgia Metropolitan Area for a household to meet the HUD definition of low- and moderate-income.

APPENDIX 4

DISPLACEMENT STATEMENT

DISPLACEMENT STATEMENT

No displacement should occur as a result of the activities to be undertaken by Gwinnett County under this Plan. However, federal regulations require that each recipient provide a plan of action to assist persons in the unlikely event of displacement. If displacement should occur, Gwinnett County would implement the provisions as required by 24 CFR Part 42, 92, and 570, and as outlined in the County's residential anti-displacement and relocation assistance plan contained in this document

APPENDIX 5

HUD CONSOLIDATED PLAN REVIEW CHECKLIST

Consolidated Plan Review Guidance

This guidance is provided as a template for the reviews of complete plans. The submission of sections dealing with Needs Assessments, Housing Market Analysis, and Strategic Plans are not required on an annual basis. Each field office should include additional questions or clarifications that address the complexity of their local situation.

Grantee: Gwinnet County, GA

1. If a Consortia, list participating communities and asterisk the lead agency: N/A

2. Consolidated Plan covers the following programs:

CDBG HOME ESG HOPWA

3. Period covered by Consolidated Plan is: 3 4 5 years.

Also, specify the period with month beginning and year ending JAN 2009 – DEC 2013

4. Date plan due: 12/15/08

5. Date plan received:

6. Automatic approval date (45 days of date received above):

7. Are maps included (optional)? **Yes X** No

8. Has an Executive Summary been attached (required)? **Yes X** No

9. Did the grantee include the following tables:

Local Jurisdiction:

Table 1A: **Yes X** No

Table 1B: **Yes X** No

Table 1C: **Yes X** No

Table 2A: **Yes X** No

Table 2B: **Yes X** No

Table 2C: **Yes X** No

Table 3A: **Yes X** No

Table 3B: **Yes X** No

Table 3C: **Yes X** No

10. Did the grantee use the CPMP Tool? Yes **No X**.

11. Did the grantee include one or more proposed outcomes in the Plan?

Yes X No Verification found on page 64, 68-72, 108

12. Does the plan include a Neighborhood Revitalization Strategy Area or Target Area where activities are carried out in a concentrated manner?

Yes **No X** Verification found on page

If yes, identify census tracts for each NRSA and forward to Headquarters.

CONSULTATION PROCESS (91.100)

1. Has the grantee consulted with other public/private entities that provide assisted housing, health services, and social services in developing this plan?

Yes X No Verification found on page 9

Use the following checklist as a guide to determine extent of consultation process:

Consultation			
24CFR	Requirement	Yes	No
91.100(a)(1)	Housing Services	X	<input type="checkbox"/>
	Social Services	X	<input type="checkbox"/>
	Fair Housing Services	X	<input type="checkbox"/>
	Health Services	X	<input type="checkbox"/>
	Homeless Services	X	<input type="checkbox"/>
91.100(a)(2)*	Chronically Homeless	X	<input type="checkbox"/>
91.100(a)(3)**	Lead-based Paint	X	<input type="checkbox"/>
91.100(a)(4)***	Adjacent Government	X	<input type="checkbox"/>
	State (Non-housing)	<input type="checkbox"/>	<input type="checkbox"/>
	County (Metro. City)	<input type="checkbox"/>	<input type="checkbox"/>
91.100(a)(5)	Metro. Planning Agencies	<input type="checkbox"/>	<input type="checkbox"/>
91.100(b)	HOPWA	X	<input type="checkbox"/>
91.100(c)	PHA Plan	X	<input type="checkbox"/>

*Were assisted housing, health, and social service agencies consulted to determine resources available to address needs of chronically homeless persons?

**Were State/Local health and child welfare agencies consulted regarding lead paint issues?

***Was copy of the plan submitted to the State, and County if applicable; if an urban county, to the entitlement cities in the county.

1. Did the grantee indicate that it consulted with other organizations that provide housing and supportive services to special needs populations (including elderly persons, persons with disabilities, persons with HIV/AIDS, homeless persons)?

Yes X No Verification found on page 9

2. Did the grantee consult with Public Housing Agencies during Consolidated Plan development?

Yes X No N/A Verification found on page 9

CITIZEN PARTICIPATION (91.105, AND 91.200)

1. Is there a description of the development of the plan and efforts to broaden public participation, including the names of organizations involved in the development of the plan?

Yes X No Verification found on page 9-11

Note: The Jurisdiction shall encourage the participation of local and regional institutions and other organization (including businesses, developers, community, and faith-based organizations) in the process of developing and implementing the plan.

2. Is there a summary of the citizen participation process, and were the public hearing and comment period requirements satisfactory?

Yes X No Verification found on page 8-33

3. Are citizen comments included in the plan, and are the comments specifically and adequately addressed by the grantee?

Yes X No Verification found on page 8-33

4. Is there a description of the lead agency or entity responsible for overseeing the

development of the Consolidated Plan?

Yes No Verification found on page 32

HOUSING AND HOMELESS NEEDS ASSESSMENT (91.205)

HOUSING

1. Has the grantee identified the estimated number and types of families with housing needs for a **5 year** period?

Yes No Verification found on pages 68-76

Note: See Table 2A (required) – page 67

Family types (extremely low-, low-, moderate, and middle income) that should be identified are:

- Renter/owner
- Elderly
- Single persons
- Large families
- Persons with disabilities
- Victims of domestic violence
- Persons with HIV/AIDs

2. Has the grantee identified the types of housing needs in the community for a 5 year period?

Yes No Verification found on page 66-81

Types of housing needs should be determined with an analysis of:

- Severe cost and cost burden
- Overcrowding (especially for large families)
- Substandard (renter/owner, extremely low-, low-, moderate, and middle income)

3. Has the grantee included a discussion of any racial or ethnic groups that have a disproportionately greater need in comparison to the needs of a particular income category?

Yes No Verification found on page Not Applicable

Note: Disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial/ethnic group is at least 10% points higher than the percentage of persons in the category as a whole. **See Section 91.205 (b) (2)**

HOMELESS

1. Has the grantee satisfactorily identified the nature and extent of homelessness, and is there a continuum of care concept? **See Table 1A (required)**. Page 53

Yes No Verification found on page 48-64

- Information should be on both homeless singles and families (and subpopulations) that are either sheltered/unsheltered or threatened with homelessness.

2. Has the grantee identified homeless facilities and services needs for homeless individuals and homeless families with children, both sheltered and unsheltered and homeless subpopulations?

Yes No Verification found on page 48-64

3. Has the grantee identified the extent of homelessness by racial/ethnic group, if the information is available?
Yes No Verification found on page Not Available
4. Did the grantee describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section)? The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process, i.e. preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living.
Yes No Pages 48-64
5. Did the grantee describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless?
Yes No Pages 62-64

SPECIAL NEEDS - NOT HOMELESS

1. Has the grantee included a discussion on the estimated number of non-homeless persons in need of supportive housing, and their supportive housing needs? **See Table 1B (optional)**.
Yes No Verification found on page 100-103
Note: Estimated number of non-homeless persons should include the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDs and their families, and public housing residents.

LEAD-BASED PAINT HAZARDS

1. Has the grantee estimated the number of housing units with lead-based paint hazards?
Yes No Verification found on page 81-82
Note: The estimated number of units should be those that are occupied by low/moderate income families.

HOUSING AND MARKET ANALYSIS (91.210)

GENERAL CHARACTERISTICS

1. Has the grantee described the significant characteristics of the housing market, and the housing stock available to persons with disabilities, and persons with HIV/AIDs?
(Review any maps if provided/See Table 1A and 1B)
Yes No Verification found in Unified Plan, Chapter C.5 & Appendix A

Note: There should be a discussion of housing supply and demand, as well as the condition and cost of the housing. Data on the housing market should include, to extent information is available, an estimate of the number of abandoned buildings and whether they are suitable for rehabilitation. The grantee should also identify and describe the locations and degree of racial/ethnic minority concentrations, as well as low/moderate income families.

2. Did the grantee identify and describe any area of low-income concentration and any area of minority concentration either in a narrative or one or more maps, stating how it defines the terms "area of low-income concentration" and "area of minority concentration"?
Yes X No see Unified Plan, Chapter C.5 & Appendix A

PUBLIC AND ASSISTED HOUSING

1. Has the grantee described the number and condition of the public housing units, results from the Section 504 needs assessments, and the strategies for improving operation and living conditions for public housing residents?
Yes X No N/A Verification found on page 83-87
2. Has the grantee identified the number of public housing units expected to be lost from the inventory?
Yes X No N/A Verification found on page 83

Check if this jurisdiction has any HOPE VI projects awarded or in development that may result in a net loss of units.

3. With regard to federal, state and locally-assisted units other than public housing, has the grantee identified the number and targeting of units by income level and household type, and the number of units expected to be lost from the assisted housing inventory for any reason, i.e. expiration of Section 8 contracts?
Yes X No Verification found on page 100-102

HOMELESS FACILITIES AND SERVICES

1. Have the facilities and services that compose the grantee's continuum of care been identified?
Yes X No Verification found on page 48-56
Appropriate facilities would be:
- Emergency shelters,
 - Transitional shelters, and
 - Permanent/supportive housing (including persons that are chronically homeless).
1. Does the inventory include, to the extent information is available, an estimate of percentage or number of beds and supportive services programs serving people that are chronically homeless?
Yes No Verification found on page 48-56

SPECIAL NEEDS FACILITIES AND SERVICES

1. Has the grantee described the facilities/services to assist non-homeless persons in need of supportive housing? **See Table 1B**
Yes X No Verification found on page 100
- Discussion should also include a description of appropriate supportive housing for persons leaving mental/physical health facilities.

BARRIERS TO AFFORDABLE HOUSING

1. Has the grantee described public policies that affect affordable housing?

Yes **X** No Verification found on page 88

Factors which affect affordable housing may include:

- Building and zoning codes;
- Environmental problems;
- Impact fees;
- Cost of land; and
- Incentive programs such as tax abatement or down-payment assistance.

Note: For Urban Counties, does the discussion include factors in both incorporated and unincorporated areas?

STRATEGIC PLAN (91.215)

When reviewing this section of the Consolidated Plan, keep in mind that the priorities/objectives should relate to the needs identified in the Housing and Homeless Needs and Housing and Market Analysis sections.

GENERAL

1. Does the grantee describe the basis for assigning the priority given to each category in Table 2A?

Yes **X** No Page 67

2. Has the grantee identified any obstacles to meeting underserved needs?

Yes **X** No Pages 88-90

3. Has the grantee summarized the priorities and specific objectives, describing how funds that are reasonably expected to be made available will be used to address identified needs? **See Tables 1A, 1B, 1C, 2A, 2B, and 2C**

Yes **X** No Pages 53, 64, 73, 67, 107, 69 respectively

4. For each specific objective, has the grantee identified proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specific time period, or in other measurable terms as identified and defined by the jurisdiction? **See Tables 1A, 1B, 1C, 2A, 2B and 2C**

Yes **X** No Pages 53, 64, 73, 67, 107, 69 respectively

AFFORDABLE HOUSING

1. Did the grantee state how the analysis of the housing market and the severity of housing problems and needs of extremely low-income, low-income, and moderate-income renters and owners identified in accordance with 91.205 provided the basis for assigning the relative priority given to each priority needs category in the priority housing needs table prescribed by HUD?

Yes **X** No Verification found on page 66 and Unified Plan, Appendix A

2. Does the affordable housing section identify how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units?

Yes **X** No Verification found on page 91

Note: If the jurisdiction intends to use HOME funds for tenant-based rental assistance or plans to use HOME funds to assist persons with special needs, the plan must specify local market conditions that led to the choice of that option.

3. Does the grantee described proposed accomplishments to specify the number of extremely low, low, moderate, and middle income families to whom the grantee will provide affordable housing as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership over a specific time period?
Yes X No Verification found on page 67 – HUD Table 2A

HOMELESSNESS

1. Does the grantee describe the strategy for helping low-income families avoid becoming homeless?
Yes X No Verification found on page 62
2. Does the grantee describe the jurisdiction's strategy for reaching out to homeless persons and assessing their individual needs?
Yes X No Verification found on page 62
3. Does the grantee describe the jurisdiction's strategy for addressing the emergency shelter and transitional housing needs of homeless persons?
Yes X No Verification found on page 60-64
4. Does the grantee describe the jurisdiction's strategy for helping homeless persons (especially persons that are chronically homeless) make the transition to permanent housing and independent living?
Yes X No Verification found on page 60-64

OTHER SPECIAL NEEDS

1. With respect to supportive needs of the non-homeless, does the plan describe the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing?
Yes X No Verification found on page 100

NON-HOUSING COMMUNITY DEVELOPMENT PLAN

1. Did the grantee describe the priority non-housing community development needs, reflecting the needs for the type of activity? **Table 2B (required)**
Yes X No Verification found on page 107
Note: The Community Development component of the plan must state the grantee's specific long-term and short-term community development objectives (including economic development activities that create jobs) that must be developed in accordance with the statutory goals described in 24 CFR 91.1 and the primary objectives of the CDBG program.
2. Is the grantee requesting approval of a Neighborhood Revitalization Strategy Area?
Yes No **NO X**
If YES, does it meet the requirements of CPD Notice 96-1 and include outcomes?
Yes No **NO X [Not Applicable]**
Note: Separate documentation should be maintained to verify compliance with CPD Notice 96-1.

BARRIERS TO AFFORDABLE HOUSING

1. Does the grantee describe the jurisdiction's strategy to remove or ameliorate negative effects of public policies, that serve as barriers to affordable housing as identified in the needs assessment section?
Yes X No Verification found on page 88

LEAD-BASED PAINT HAZARDS

1. Does the plan outline the actions proposed or being taken to evaluate and reduce lead-based paint hazards, describe how the plan for reduction of lead-based paint hazards is related to the extent of lead poisoning and hazards, and how the plan for reduction will be integrated into housing policies and programs?
Yes X No Verification found on page 81

ANTI-POVERTY STRATEGY

1. Does the grantee describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families?
Yes X No Verification found on page 110
Has the grantee programs such as:
- Family Self-sufficiency
 - Head Start
 - State and Local Programs
 - Section 3
 - Welfare to Work
 - Workforce Development Initiative

INSTITUTIONAL STRUCTURE

1. Does the grantee explain the institutional structure, including private industry, nonprofit organizations, community and faith-based organizations, and public institutions, through which the jurisdiction will carry out its housing, homeless, and community development plan, assessing the strengths and gaps in the delivery system?
Yes X No Verification found on page 113

COORDINATION

1. Does the plan identify the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies?
Yes X No Verification found on page 113
2. With respect to the public entities involved, does the plan describe the means of cooperation among the state and local units of government in the metropolitan area in the implementation of the plan?
Yes X No Verification found on page 113

3. With respect the homeless strategy, does the plan describe efforts to enhance coordination among agencies to address the needs of persons that are chronically homeless?
Yes X **No** Verification found on page 113
4. With respect to economic development, does the plan describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies.
Yes X **No** Verification found on page 113

PUBLIC HOUSING

1. Does the grantee describe the jurisdiction's activities to encourage public housing residents to become more involved in management and participate in homeownership?
Yes X **No** Verification found on page 114
2. Has the grantee describe the manner in which the plan of the jurisdiction will help address the needs of public housing?
Yes X **No** Verification found on page 114
Note: Amended to Title 1 October 21, 1998 Section 105(b)(11)
3. Is the grantee served by a troubled PHA as designated by HUD?
Yes **No** **NO X**
If YES, Has the grantee in which any troubled public housing agency is located, described the manner in which the State or unit of local government will provide financial or other assistance to such troubled agency in improving its operations to remove such designation?
Yes **No** Verification found on page
Note: Amended to Title 1 October 21, 1998 Section 105(g)

ACTION PLAN (91.220)

1. Has the Standard 424 Form for the applicable programs been included with the correct dollar allocations and signed by the appropriate official?
Yes X **No**
2. Is the DUNS number listed?
Yes X **No**
3. Did the grantee describe the geographic areas of the jurisdiction (including areas of low income and/or racial/minority concentration) in which assistance will be directed during the next year.
Yes X **No**
4. Did the grantee describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
Yes X **No**

RESOURCES

1. Has the grantee described the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives identified in the plan?
Yes X **No** Verification found on page 93

2. Did the grantee describe how HOME and/or ESG matching requirements will be satisfied?
Yes No N/A Verification found on page Project Forms 93/107

ACTIVITIES 91.220(D)

- 1.
- a) Has the grantee described the CDBG funded activities for the program year in a complete manner? **See Table 3C** see pages 94-109
Yes No
 - b) Has the grantee described the HOME funded activities for the program year in a complete manner? **See Table 3C** see pages 94-109
Yes No
 - c) Has the grantee described the ESG funded activities for the program year in a complete manner? **See Table 3C** see pages 94-109
Yes No
 - d) Has the grantee described the HOPWA funded activities for the program year in a complete manner? **See Table 3C**
Yes **No X – Gwinnett County does not receive HOPWA funds from HUD**
2. Does the action plan contain a summary of priorities and specific annual objectives that will be addressed during the program year?
Yes No Verification found on pages 76, 82
Note: The Jurisdiction should use summary of annual objectives as identified in Table 3A of the Consolidated Plan.
3. Do the proposed activities correspond to the priority needs identified/local specific objectives listed in the Consolidated Plan?
Yes No Verification found on page 76
Note: The Jurisdiction should use priority needs as identified in Table 2A and 2B of the Consolidated Plan.
4. Are the proposed activities identified in sufficient detail, including the number and type of families that will benefit from the proposed activities and locations, so that citizens know the degree to which they may be affected?
Yes No Verification found on pages 94-109

Outcomes 91.220(e)

1. Does the action plan contain outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006?
Yes No Verification found on pages 94-109

Expenditure Limits

1. Has the grantee exceeded the 20% administrative cap for CDBG?
Yes **No X**
2. Has the grantee exceeded the 15% public service cap for CDBG?
Yes **No X**
3. Has the grantee exceeded the 10% administrative cap for HOME?
Yes **No X**
4. Has the grantee met the 15% CHDO set-aside for HOME?
Yes No

5. Has the grantee exceeded the 3% administrative cap for HOPWA or the 7% administrative cap by project sponsors under HOPWA?
Yes **No X** - Gwinnett County does not receive HOPWA funds from HUD

GEOGRAPHIC DISTRIBUTION 91.220(f)

1. Did the grantee include a narrative, maps, or tables that identify the geographic areas in which it will direct assistance?
Yes X No Verification found on pages 110-115
2. Does the grantee provide a description of the areas, including areas of minority concentration, in which it will direct funds?
Yes X No Verification found on pages 110-115
3. Does the grantee provide the rationale for the priorities for allocating investment geographically for each program, including within the metropolitan area (or a State's service area) for the HOPWA program?
Yes X No Verification found on pages 130-131
If no, explain the basis for the no response: Gwinnett County does not receive HOPWA Funds
4. Did the grantee estimate the percentage of funds it plans to dedicate to target areas?
Yes X No Verification found on page 131

AFFORDABLE HOUSING GOALS 91.220(g)

1. Does the action plan specify one-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing units using funds made available to the jurisdiction?
Yes X No Verification found on page 132
Note: The Jurisdiction should use housing summary of goals as identified in Table 3B of the Consolidated Plan.
2. Does the action plan specify one-year goals for the number of households to be provided affordable housing units through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of exiting units using funds made available to the jurisdiction?
Yes X No Verification found on page 132
Note: The Jurisdiction should use housing summary of goals as identified in Table 3B of the Consolidated Plan.

PUBLIC HOUSING 91.220(h)

1. Does the action plan include actions that address the following, *if applicable*:
- needs of public housing, **Yes X** No see page 122
 - public housing improvements and resident initiatives, **Yes X** No see pages 121-128
 - assist troubled public housing agencies. Yes **No X** **no troubled housing authorities in Gwinnett County.**

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES 91.220(i)

1. Have homeless prevention activities been proposed?
Yes **No X** Verification found on page

2. Have emergency shelter, transitional housing, programs to assist in the transition to permanent housing and independent living been proposed?
Yes X No Verification found on pages 76, 107

3. Are supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, person with HIV/AIDS, persons with alcohol or other substance abuse problems)?
Yes X No Verification found on pages 76, 105

4. Have specific action steps to end chronic homelessness been identified?
Yes X No Verification found on pages 76, 127

OTHER ACTIONS 91.220(k)

1. Does the Action Plan include other proposed actions which will address the following, **if applicable**:
 - foster and maintain affordable housing, **Yes X** No , see page 122
 - public housing improvements and resident initiatives, **Yes X** No , see pages 121-128
 - evaluation and reduction of lead-based hazards, **Yes X** No , see page 123
 - reducing the number of persons below the poverty line, **Yes X** No , see page 124
 - developing institutional structures/enhancing coordination between housing and services agencies, **Yes X** No , see page 133.

PROGRAM SPECIFIC REQUIREMENTS 91.220(l)

1. CDBG
 - a) Does the total amount of funds allocated equal the amount of the grant plus program income and carryover funds? **Yes X** No , see page 76

 - b) Does the action plan identify the amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income? **Yes X** No , see page 133.

1. HOME
 - a) Did grantee (PJ) describe other forms of investment? **See Section 92.205**
Yes X No N/A , see page 118
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254?
Yes X No N/A , see page 117

- b) If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, did they state its refinancing guidelines required under 24 CFR 92.206(b)?
Yes X No N/A , see page 119
- c) Resale Provisions -- For homeownership activities, did the participating jurisdiction must describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).
Yes X No , see page 117
- d) HOME Tenant-Based Rental Assistance -- Did the participating jurisdiction must describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program?
Yes **No X** N/A
 - a. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.
- e) If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), did the jurisdiction describe these forms of investment?
Yes X No, , see page 118
- f) Did the jurisdiction describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units?
Yes X No , see page 118
- g) Did the jurisdiction describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction?
Yes X No , see page 118
- h) If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, did it state its financing guidelines required under 24 CFR 92.206(b)?
Yes X No , see page 119

1. American Dream Downpayment Initiative

- a. If the jurisdiction planned to use American Dream Downpayment Initiative (ADDI) funds to increase access to homeownership, did it provide the following information:
 - i. description of the planned use of the ADDI funds?
Yes X No , see page 120
 - ii. plan for conducting targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide downpayment assistance for such residents, tenants, and families? **Yes X** No , see page 1209
 - iii. a description of the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers?
Yes X No , see page 120

4. HOPWA

- a) Does the action plan specify on-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities operated with HOPWA funds? Yes No **X**

Verification found on page **Gwinnett County receives no HOPWA funds from HUD.**

- b) Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)?

- c) Yes No **X** Verification found on page

Gwinnett County receives no HOPWA funds from HUD.

MONITORING (91.230)

1. Does the grantee describe the standards and procedures that it will use to monitor activities carried out in furtherance of the plan?

Yes **X** No Verification found on page 126

2. Does the Plan describe actions to be taken by the grantee to monitor its performance in meeting its goals and objectives set forth in it's Consolidated Plan?

Yes **X** No Verification found on page 126

3. Does the Plan describe steps/actions being taken to insure compliance with program requirements, including requirements involving the timeliness of expenditures?

Yes **X** No Verification found on page 126

Note: If timeliness of expenditures is an issue, please make sure the grant award letter includes language regarding appropriate actions the grantee should take to remedy this problem.

4. Does the Plan describe steps/actions it will use to ensure long-term compliance with housing codes, including any actions or on-site inspections it plans to undertake during the program year?

Yes **X** No Verification found on page 126

Note: For example, a HOME program grantee should identify steps it will take to review affordable housing projects it has funded to insure compliance with all HOME program requirements.

5. Does the Plan describe actions to be taken by the grantee to monitor its subrecipients, (including sponsors or administering agents)?

Yes **X** No Verification found on page 126

HUD APPROVAL ACTION

The regulations at Section 91.500(b) state that HUD will approve or disapprove a plan or a portion of a plan for the three following reasons:

- 1) if it is inconsistent with the purposes of NAHA;
- 2) if it is substantially incomplete; and/or
- 3) if certifications are not satisfactory to the Secretary
- 4) if does not include description of manner in which unit of local government or state will provide financial or other assistance to troubled public housing agencies.

Please use the following to determine approval or disapproval:

CONSISTENCY WITH NAHA

1. Is the Plan inconsistent with the purposes of NAHA?

Yes No

If the Plan is inconsistent with NAHA, set forth the basis of that determination by using the following as a guide:

- Does the Plan provide assistance to help families, not owning a home, to save for a down-payment for the purchase of a home.
- Does the Plan provide assistance to retain, where feasible, as housing affordable to low income families, those dwelling units provided for such purpose with federal assistance.
- Does the Plan provide assistance to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of housing affordable to low- and moderate-income families.
- Does the Plan provide assistance to expand and improve federal rental assistance for very low-income families.
- Does the Plan provide assistance to increase the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence.

SUBSTANTIALLY INCOMPLETE

1. Is the Plan (including any corrective actions taken at HUD's request during HUD's review of the plan) substantially incomplete?

Yes No

If the Plan is substantially incomplete, set forth the basis of that determination by using the following as a guide:

- The Plan was developed without the required citizen participation or the required consultation.
- The Plan fails to satisfy all the required elements in the regulations.

AFFIRMATIVELY FURTHERING FAIR HOUSING

1. Is the Certification to Affirmatively Further Fair Housing satisfactory to the Secretary?
 Yes No

If the Certification is not satisfactory, set forth the basis of that determination by using the following as a guide:

- Disregard of regulatory requirements to conduct an analysis of impediments to fair housing choice, take appropriate actions to address identified impediments, and maintain adequate records on the steps taken to affirmatively further fair housing in the jurisdiction.
- Lack of action taken on outstanding findings regarding performance under affirmatively furthering fair housing certification requirements of the Consolidated Plan or the Community Development Block Grant Program.

CERTIFICATIONS (91.225)

1. Are the general and specific certifications for each program funded complete and accurate, where applicable:

Note: Consortia, please refer to 91.425
 State, please refer to 91.325

General:

- | | | |
|--|------------------------------|-----------------------------|
| (1) Affirmatively furthering fair housing: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-displacement and relocation Plan: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Drug-free workplace: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Anti-lobbying | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (5) Authority of Jurisdiction | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Consistency with Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Acquisition and relocation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (8) Section 3 | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

CDBG: **

- | | | |
|---|------------------------------|-----------------------------|
| (1) Citizen Participation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Community Development Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Following Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Use of funds | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (5) Excessive Force | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Compliance with anti-discrimination law | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Compliance with lead-based paint procedures | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (8) Compliance with laws | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

ESG:

- | | | |
|---|------------------------------|-----------------------------|
| (1) Not less than 10-years | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Not less than 3-years | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Service Provision | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Safe and Sanitary | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (5) Supportive Services | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Match Requirements | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Confidentiality | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (8) Employing or involving the homeless | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (9) Consolidated Plan compliance | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(10) Discharge policy Yes No

HOME

(1) TBRA is consistent w/Plan Yes No

(2) Use for eligible activities Yes No

(3) Monitor for subsidy layering Yes No

HOPWA:

(1) Meet urgent needs Yes No

(2) 10- or 3-year operation Yes No

***The certification period for the CDBG program's overall benefit requirements must be consistent with the period certified in the prior certification.*

Based on my review of the Plan against the regulations, I have determined the Plan is:

Approved

Disapproved

Date plan disapproved (in part or in its entirety):

Note: Written notification of disapproval must be communicated to the applicant in accordance with 24 CFR 91.500(c). **If disapproved**, provide documentation including dates and times on incompleteness determination, and discussions with grantee and Headquarters:

Reviewed by

DATE:

Program Manager

DATE:

CPD Director

APPENDIX 6
ANNUAL ACTION PLANS AND AMENDMENTS 2009-2013
