



# FY2019-2023 CONSOLIDATED PLAN

CITY OF DALTON

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PREPARED BY:  
BLULYNX SOLUTIONS



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## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

#### 1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Cindy Jackson	City of Dalton Finance Department

**Table 1 – Responsible Agencies**

#### Narrative

The City of Dalton is the lead agency for the development, administration, and review of the Five-Year Consolidated Plan and Annual Action Plan. Administrative support and oversight are provided by the City's Finance Department. The Consolidated Plan and Annual Action Plan provide a comprehensive strategy to address the City's housing and community development needs with CDBG funds. All CDBG-funded projects are reviewed and monitored by the City's Finance Department for compliance with applicable federal rules and regulations.

#### Consolidated Plan Public Contact Information

Public concerns, issues, or comments regarding the Consolidated Plan and Annual Action Plan may be directed to:

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City of Dalton  
300 West Waugh Street  
Dalton, GA 30720  
Phone: (706) 529-2460  
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## Executive Summary

### ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Dalton's Five-Year Consolidated Plan (Con Plan) is mandated by federal law and regulations promulgated by the U.S. Department of Housing and Urban Development (HUD) in order for the City to receive federal funding for affordable housing and community development initiatives benefitting primarily low- and moderate-income persons. This Con Plan consolidates into a single document the planning and application requirements for the Community Development Block Grant (CDBG) program and the HOME Investment Partnerships (HOME) program.

Con Plans must be prepared and submitted to HUD every three to five years. The City uses a five-year Con Plan cycle and has a program year beginning July 1. This plan covers fiscal years 2019 – 2023.

The purpose of the City of Dalton's Con Plan is to:

- Assess the City's affordable housing and community development needs
- Analyze the City's housing markets
- Articulate the City's priorities, goals, and strategies to address identified needs, and
- Describe the actions the City will take to implement strategies for affordable housing and community development.

The City's Con Plan for FY2019 – FY2023 provides data on trends and conditions related to Dalton's current and future affordable housing and community development needs. The analysis of this data has been used to establish priorities, strategies, and actions that the City will undertake to address these needs over the next five years. Annually, the City will develop its Action Plan in which it will describe the planned investment of federal resources to implement specific activities.

The City of Dalton receives an annual formula-based allocation from HUD. In Program Year (PY) 2019, the City of Dalton will receive \$399,838.00 in CDBG funding. The federal funding listed above is funding which is received annually to support activities outlined in this Plan.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

During the development of the Consolidated Plan, a number of priority needs were identified. Guidelines for addressing these priority needs over the 2019-2023-time frame are summarized below:

- **Affordable Housing**
  - Housing Rehabilitation
  
- **Public Facility and Infrastructure Improvements**
  - Rehabilitation, acquisition, accessibility improvements of neighborhood facilities
  - Park Improvements
  - Sidewalk and Infrastructure Improvements
  - Support services for populations with special needs (e.g. elderly, persons with disabilities)
  
- **Public Services**
  - Health and dental services
  - Services for the homeless and at-risk populations
  - Youth and childcare programs
  - Transportation for seniors and youth

## **3. Evaluation of past performance**

The summary of past performance reported below was taken from the City's most recently completed Consolidated Annual Plan Evaluation Report completed for fiscal year 2017 and submitted to HUD.

CDBG funds were used to address a wide range of community development needs. CDBG funds were allocated for parks, sidewalks, and sidewalk improvements, code enforcement, and programs for homeless persons and abused and neglected spouses. The following provides a highlight of some of the projects that were completed in 2017.

A total of **\$33,239.98** in CDBG funds was expended for public services activities for low income households served by Family Promise, Inc. and Northwest Georgia Family Crisis Center, Inc.

A total of **\$46,935.00** of CDBG funds was expended by the City of Dalton for administration and planning activities.

The City of Dalton utilized **\$52,575.08** of CDBG funds for the installation of 1,060 feet of new sidewalks at Richardson Street and Trammell Street. The sidewalks were constructed of poured in place concrete with a brushed finish in compliance with ADA and Federal design standards.

The City of Dalton also utilized **\$15,787.79** of CDBG funds for code enforcement activities in low- and moderate-income areas. A total of 381 corrective citations with were issued and addressed by homeowners.

#### **4. Summary of citizen participation process and consultation process**

The following measures were taken to encourage citizen participation:

- Posted copies of the draft plans in Dalton City Hall. The location of the copies was noted in the final hearing legal advertisement.
- Posted draft plans electronically on the City's website.
- Provided opportunity to comment on the plans at three formal meeting settings.
- Published all meetings in the local newspaper legal advertisement section.
- Solicited comments from interested social service agencies.
- Advertised final public hearing schedule in the local newspaper. The final public hearing will be held on a date to be announced.
- Web-based surveys for the public from March 6, 2019 to March 21, 2019 which generated 23 responses in total. Questions focused on housing and community development needs.
- A draft of the Consolidated Plan for FY2019-2023 and the Annual Plan for FY2019 was placed on public display for 30 days beginning on a date to be determined.
- The City held a public hearing on a date to be determined at a time to be determined to obtain final comments on the proposed Consolidated Plan for FY 2019-2023, the proposed use of funds for FY 2019.

#### **5. Summary of public comments**

Major needs highlighted during the Public Needs Hearing, Neighborhood Meetings, and stakeholder interviews are as follows:



### Public Services Needs

Need more services for mentally ill and disabled persons

Need more services for disabled persons and mentally ill persons

Homelessness is a growing need for the City

More assistance for Veterans

More prevention assistance for low-income and homeless persons

### Affordable Housing Needs

Lack of subsidized housing for low income and homeless persons, such as Tenant Based Rental Assistance programs

Lack of transitional housing programs

Need more first-time homebuyer programs

Need more long-term housing for homeless persons

Need more long-term options for sustaining affordable housing

Rental market rates are high

### Other Issues

Need more transportation alternatives for low income households

These comments have been incorporated into the City's current Consolidated Plan and will be taken in consideration of funding priorities for the City's future Action Plan activities funded with CDBG dollars.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments and views regarding the specific language or scope of the proposed goals and strategies were accepted. Public comments were primarily directed at the project specific Action Plan level.

## **7. Summary**

In summary, the Consolidated Plan and Annual Action Plan have been developed with community input and reflect the needs of the City.

## **PR-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The City developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, neighborhood meetings, published meeting notices, and a web survey conducted in both English and Spanish.

Consultation with the community and affected service providers is a fundamental component of the Consolidated Plan and Action Plan process. The City of Dalton conducted consultation with citizens, municipal officials, non-profit agencies, public housing agencies, governmental agencies, and the Continuum of Care in preparing this Plan.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The City of Dalton welcomed and encouraged the participation of all citizens in the development of these plans and in the review of progress in implementing plan activities. The City particularly encourages involvement by low-and moderate-income households residing in areas targeted for program activities for minorities and non-English speaking persons, as well as persons with disabilities. In addition, residents of public housing and other assisted housing are encouraged to participate. A special effort is made to assure that low-and moderate-income persons, households in areas assisted by program activities and persons special needs have opportunities to participate. The City will provide translators for non-English speaking persons who request assistance at least 7 days prior to hearings or other meetings in the planning process.

The City held one public meeting through its public participation process prior to the development of the plan and one public meeting to review the draft priorities. These meetings are summarized in the Citizen Participation Section of this plan. Drafts of the plans have been posted on the City webpage and at City Hall. Notices of public meetings and hearings were also published in the local newspaper.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The City of Dalton is part of the Balance of State Continuum of Care administered by the Georgia Department of Community Affairs. The City of Dalton collaborates locally with the Dalton Whitfield Community Development Corporation (DWCDC) to stay abreast of needs of homeless persons and persons at risk of homelessness in Dalton. Through the DWCDC, the City shares data regarding homeless needs in the City along with working through regulatory compliance issues

as they arise. The DWCDC is also the lead agency on the Point in Time Count which is a survey taken every January of all the homeless served in Dalton and Whitfield County.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City coordinates with the Dalton Whitfield Community Development Corporation who is a participant in the GA-501 Georgia Balance of State Continuum of Care. The CoC is directly responsible for measuring performance both community-wide and program specific as it relates to reducing homelessness; developing and managing a centralized or coordinated assessment that addresses the housing and services needs for all individuals and families who experience homelessness; preparing and overseeing the application for community funding; and establishing funding priorities.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

Representatives from the broad community, community councils, social service agencies, businesses, housing agencies, community development corporations and other government agencies took the online survey in March 2019. Stakeholder Meetings were also held and included representatives from the following organizations:

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of Plan Addressed by Consultation	How Consulted
City of Dalton	Local Government	Strategic Priorities	Needs Assessment
Community Housing Resources Corporation	Local Non-profit	Strategic Priorities	Needs Assessment
Dalton Housing Authority	Low Income Housing Provider	Strategic Priorities	Needs Assessment
Dalton NAACP	Civic Organization	Strategic Priorities	Needs Assessment
Dalton Utilities	Public Utility	Strategic Priorities	Broadband Requirements
Dalton-Whitfield County Community Development Corporation	Housing Provider	Strategic Priorities	Needs Assessment
Georgia Legal Aid Services	Legal Services	Strategic Plan	Needs Assessment
Spectrum	Broadband Provider	Strategic Priorities	Broadband Requirements

Viastat	Broadband Provider	Strategic Priorities	Broadband Requirements
Windstream	Broadband Provider	Strategic Priorities	Broadband Requirements
Whitfield County Hazard Mitigation Planning Committee (HMPC)	Local Government	Strategic Priorities	Hazard Mitigation

**Table 2 – Agencies, groups, organizations who participated**

**Identify any Agency Types not consulted and provide rationale for not consulting**

The City did not exclude any agency type or agency during this process.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Georgia Balance of State	Coordinating homelessness services with Continuum of Care priorities
Redevelopment Plan	City of Dalton	Coordinating community development plans with larger plans to redevelop commercial areas
Whitfield County Comprehensive Plan	Whitfield County	Coordinating future land use planning, zoning development ordinance, transportation planning, and infrastructure planning
Whitfield County Hazard Mitigation Plan	Whitfield County Hazard Mitigation Planning Committee (HMPC)	Coordinating hazard mitigation planning with placement of CDBG investment.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The City of Dalton will continue to partner with local government agencies and groups to ensure full and complete implementation of the Consolidated Plan. These will specifically include collaborating with Whitfield County Planning Department as they begin the process of implementing the Comprehensive Plan developed for 2018-2022. This update will allow the City

of Dalton's CDBG program the ability to provide input on future land use and development initiatives.

## **PR-15 Citizen Participation**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The following measures were taken to encourage citizen participation:

- Posted copies of the draft plans in Dalton City Hall. The location of the copies was noted in the final hearing legal advertisement.
- Posted draft plans electronically on the City's website.
- Provided opportunity to comment on the plans at three formal meeting settings.
- Published all meetings in the local newspaper legal advertisement section.
- Solicited comments from interested social service agencies.
- Advertised final public hearing schedule in the local newspaper. The final public hearing will be held on a date to be determined.
- Web-based surveys for the general-public from March 6, 2019 to March 21, 2019 which generated 23 responses in total. Questions focused on housing and community development needs.
- A draft of the Consolidated Plan for FY2019-2023 and the Annual Plan for FY2019 was placed on public display for 30 days beginning on a date to be determined.
- The City held a public hearing on a date on Wednesday, May 1, 2019 at Dalton City Hall, 300 W. Waugh Street, Dalton GA 30720 at 3:00pm to obtain final comments on the proposed Consolidated Plan for FY 2019-2023, the proposed use of funds for FY 2019. No comments were received during this meeting.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/ broad community	There were 2 public meeting held with a total of 6 attendees.	Affordable housing, infrastructure improvements, economic development, lack of public transportation, commercial revitalization, housing rehabilitation for disabled adults, and employment were the top needs identified. Some other concerns expressed were lack of coordination of services from non-profits, and better schools.	All comments were accepted	n/a
2	Newspaper Ad	Non-targeted/ broad community	The public was notified of the public meetings via a newspaper ad in the Daily Citizen News	The City did not receive any comments based solely on the newspaper ad.	All comments were accepted	n/a
3	Survey	Non-targeted/ broad community	The survey received 23 responses.	The survey was used to capture comments. The survey analysis is attached.	All comments were accepted	<a href="http://www.surveymonkey.com/r/dalton">www.surveymonkey.com/r/dalton</a> EnEspañol: <a href="https://es.surveymonkey.com/r/daltonesp-anol">https://es.surveymonkey.com/r/daltonesp-anol</a>

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

Based on HUD-provided figures, the following data indicates the number and percentage of renters and homeowners who may be subject to housing problems based on income level. The economic recession over the last ten years has contributed to the increased the number of households experiencing housing problems and cost burdens.

HUD receives a “special tabulation” of data from the U.S. Census Bureau’s American Community Survey (ACS) that is not available through standard Census products. This data, known as the Comprehensive Housing Affordability Strategy (CHAS) data, is used by local governments for housing planning and as part of the Consolidated Planning process. It shows the number of households that fit certain combinations of HUD-specified criteria such as housing needs, HUD-defined income limits (primarily 30, 50, and 80 percent of area median income), and household types of interest to planners and policy-makers.

Assessing the specific housing needs of Dalton is critical to creating a realistic and responsive affordable housing strategy. As such, an assessment of the affordable rental and single-family homes was conducted based on available demographic, economic, and housing data for the City. The assessment utilized HUD’s new eCon Planning Suite within the Integrated Disbursement and Information System (IDIS). The eCon Planning Suite pre-populates the most up-to-date housing and economic data available to assist jurisdictions in identifying funding priorities in the Consolidated Plan and Annual Action Plan. Highlights of the assessment are provided in the sections below.



**NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)**

**Summary of Housing Needs**

The tables and narratives below present housing need data for the City of Dalton, provided by HUD, as part of its online eCON Consolidated Plan program. The data originally derived from the 2007-2011 ACS and the HUD CHAS database..

<b>Demographics</b>	<b>Base Year: 2000</b>	<b>Most Recent Year: 2013</b>	<b>% Change</b>
Population	33,128	33,495	1%
Households	11,467	11,405	-1%
Median Income	\$39,635.00	\$35,074.00	-12%

**Table 5 - Housing Needs Assessment Demographics**  
**Data Source:**2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

**Number of Households Table**

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households *	990	2,065	2,250	1,285	4,815
Small Family Households *	335	485	985	360	2,220
Large Family Households *	80	400	285	280	620
Household contains at least one person 62-74 years of age	145	365	330	170	860
Household contains at least one-person age 75 or older	105	455	240	85	41
Households with one or more children 6 years old or younger *	255	515	655	455	539

**Table 6 - Total Households Table**  
**Data Source:** 2009-2013 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	30	50	60	140	0	0	0	0	0
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	35	0	10	10	55	0	4	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	35	245	170	55	505	15	85	35	70	205
Housing cost burden greater than 50% of income (and none of the above problems)	545	450	55	0	1,050	65	160	90	40	355
Housing cost burden greater than 30% of income (and none of the above problems)	50	580	610	145	1,385	10	155	245	105	515
Zero/negative Income (and none of the above problems)	120	0	0	0	120	15	0	0	0	15

**Table 7 – Housing Problems Table**

**Data** 2009-2013 CHAS  
**Source:**

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	610	725	285	125	1,745	80	250	125	110	565
Having none of four housing problems	135	790	1,190	615	2,730	25	305	650	435	1,415
Household has negative income, but none of the other housing problems	120	0	0	0	120	15	0	0	0	15

**Table 8 – Housing Problems 2**

**Data** 2009-2013 CHAS  
**Source:**

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	245	375	320	940	10	25	225	260
Large Related	55	230	25	310	10	100	25	135
Elderly	130	329	110	569	10	229	85	324
Other	195	320	235	750	50	30	25	105
Total need by income	625	1,254	690	2,569	80	384	360	824

**Table 9 – Cost Burden > 30%**

**Data** 2009-2013 CHAS  
**Source:**

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	225	85	15	325	10	0	45	55
Large Related	40	80	0	120	0	100	0	100
Elderly	115	225	40	380	10	115	45	170
Other	180	130	0	310	50	15	0	65
Total need by income	560	520	55	1,135	70	230	90	390

**Table 10 – Cost Burden > 50%**

**Data** 2009-2013 CHAS  
**Source:**

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	55	220	130	55	460	10	85	35	45	175
Multiple, unrelated family households	15	25	35	10	85	4	4	0	25	33
Other, non-family households	0	0	15	0	15	0	0	0	0	0
Total need by income	70	245	180	65	560	14	89	35	70	208

**Table 11 – Crowding Information – 1/2**

**Data** 2009-2013 CHAS  
**Source:**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

**Table 12 – Crowding Information – 2/2**

**Describe the number and type of single person households in need of housing assistance.**

The 2009-2013 CHAS data tables, detailed above, identify 4,245 households in Dalton that face at least one housing problem, with the most common housing problem identified as cost burden. Cost Burden is a housing condition in which housing costs, including utilities, total more than 30% of monthly income. Nearly 33 percent of residents who were cost burdened were paying more than 30% of their income on housing costs with a 25 percent of residents paying more than 50% of their total income on housing costs.

According to the 2013-2017 American Community Survey (ACS) data, 29.2 percent of all households in Dalton were single person households. Single person households make up 24.1 percent of all owner-occupied households and 32.7 percent of all renter-occupied households.

The City does not have extrapolated data on the number of single individuals who were unsheltered in emergency shelters or transitional housing programs for homeless people. In order to meet the needs of single homeless individuals, the level of services available within shelters for single individuals must be available. Shelter capacity could be reconfigured to more intensive case management services that support individual development.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

According to the 2017 ACS estimates, 8.7 percent of the total population were of a disabled status. The city does not have data available on victims of domestic violence, dating violence, sexual assault and stalking who may also need housing assistance.

**What are the most common housing problems?**

1. Housing lacking complete kitchen facilities
2. Housing lacking complete plumbing facilities
3. Household is overcrowded (with more than 1 person per room)
4. Household is cost burdened (paying more than 30% of income towards housing costs, including utilities)

In addition, HUD defines severe housing problems as:

- Severely overcrowded, with more than 1.5 persons per room
- Severely cost burdened families (paying more than 50% of income towards housing costs, including utilities)

The most common housing problem within the City is cost burden, with 29.6 percent of all households (22.5 percent of renters and 7.2 percent of owners) paying more than 30% of their

income towards housing costs. In summary, 3,393 households – including nearly 30 percent of all renters – are cost burdened and 390 are severely cost burdened. This housing problem is experienced by all income levels and is more common among renters.

When considering the total number of low- and moderate-income households who pay more than 30% of their total monthly income towards housing. The housing trend reflects renters and extremely low-income households are much more likely to have housing problems than homeowners and higher income households.

**Are any populations/household types more affected than others by these problems?**

CHAS data on severe housing problems indicated 3,255 renter households and 1,094 owner households had one or more housing problems. This trend holds true with overcrowding, as 560 renter households were overcrowded households. The elderly, particularly homeowners, were also affected by cost burdens, comprising nearly 20 percent of households with incomes below 30 percent AMI.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Individuals with an imminent risk of residing in shelters or becoming unsheltered typically have a combination of financial factors present in their lives: lack of living wage job, rent consuming more than 30% of their income, and high child care, medical, or transportation costs. In addition to these factors, individuals at risk of homelessness will often have additional issues present to include family conflicts, domestic violence, doubling up with family members, recent crisis, housing with code or safety violations, family members with disabilities, criminal histories, history of mental health or chemical dependency, difficulty navigating systems to access public benefits or community based services, and prior experience with homelessness. The city will continue to coordinate services through the CoC to address the need of residents who are currently housed but are at imminent risk of becoming unsheltered.

Participants locally housed through the Rapid Rehousing Program need financial literacy, credit counseling, and budget classes. Those who have been unable to find work are in desperate need of job training. The skill set for an entry level worker has changed, so many former workers are unable to make the transition into existing job opportunities. Often times they are in need of a sustainable source of transportation as their cars are in need of repair or they do not have the money to pay the insurance and tag fees. A huge need for these individuals and families when they come into Rapid Rehousing is locating a unit that meets the FMR guideline while being near resources and services.



**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The City adheres to the HUD definition of “At-Risk”. An individual or family who:

- (i) Has an annual income below 30% of median family income for the area; AND
  
- (ii) Does not have enough resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
  
- (iii) Meets one of the following conditions:
  - (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
  
  - (B) Is living in the home of another because of economic hardship; OR
  - (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
  
  - (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
  
  - (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
  
  - (F) Is exiting a publicly funded institution or system of care; OR
  
  - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Severe cost burden is the greatest predictor of homelessness risk, with populations paying more than 50% of their income towards housing costs or having incomes at or below 50% AMI.

**Discussion**

Low rates of housing affordability and low vacancy levels hamper access to stable affordable housing. Like other segments of the community, the City's homeless population anticipates higher rates of the homeless elderly and that more seniors will be living alone over the next decade. Housing stock will need to accommodate these population changes and offer access to smaller units that are affordable on a fixed income, are physically accessible, and are located near community-based support services.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

HUD defines a disproportionately greater number of housing problems by a racial or ethnic group as when a group experiences housing problem at a rate more than 10% greater than the income group as a whole. The data summarizes the percentage of each minority group experiencing any of the four housing problems: cost burden (paying more than 30% of income for housing); overcrowding (more than one person per room); and lacking complete kitchen facilities or complete plumbing facilities (substandard housing). Income classifications are defined as: extremely low-income (under 30% of HAMFI); low-income (between 30 and 50%); moderate-income (between 50 and 80%); and middle-income (between 80 and 100%).

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	750	100	135
White	445	50	90
Black / African American	65	0	0
Asian	20	0	0
American Indian, Alaska Native	20	15	0
Pacific Islander	0	0	0
Hispanic	154	30	44

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

**Data** 2009-2013 CHAS

**Source:**

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,710	360	0
White	770	155	0
Black / African American	295	75	0
Asian	15	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	625	130	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

**Data** 2009-2013 CHAS

**Source:**

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,270	980	0
White	575	470	0
Black / African American	160	85	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	535	420	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

**Data** 2009-2013 CHAS  
**Source:**

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	485	800	0
White	220	455	0
Black / African American	25	65	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	245	275	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

**Data** 2009-2013 CHAS  
**Source:**

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Discussion**

The disparate impact analysis for housing problems determined that African American populations represented at least 50% of the jurisdiction as a whole. Households at every income level had a high frequency of housing problems across all racial and ethnic groups. Low-income Whites and African Americans in every income category experienced disproportionately greater need in terms of housing problems.

The housing assessment determined that cost burdens at 30% and 50% (of housing costs) were the overwhelming problem among the four housing problems. At 0-30% AMI, 50% cost burdens were the most significant problem but among renters. Cost burdens are the most pressing housing problems especially at the lower income levels for renters and owners.

**NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

Severe housing problems for occupied units indicate the physical condition or lack of necessary living standards per household. CHAS data summarizes the percentage of each minority group experiencing any of four severe housing problems: cost burden (paying more than 50% of income for housing); overcrowding (more than 1.5 persons per room); and lacking complete kitchen facilities or complete plumbing facilities (substandard housing).

There was only one instance of disproportionately greater need with severe housing problems: 69% of low-income Whites experienced one or more housing problems. Considering the overall population within these two minority group, the age of the data, and the limited sample size, the results of this analysis should be used with caution.

**0%-30% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	690	160	135
White	430	65	90
Black / African American	65	0	0
Asian	10	10	0
American Indian, Alaska Native	20	15	0
Pacific Islander	0	0	0
Hispanic	114	65	44

**Table 17 – Severe Housing Problems 0 - 30% AMI**

**Data** 2009-2013 CHAS

**Source:**

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	975	1,095	0
White	450	475	0
Black / African American	125	245	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	395	360	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

**Data** 2009-2013 CHAS

**Source:**

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	410	1,840	0
White	205	830	0
Black / African American	25	220	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	175	775	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

**Data** 2009-2013 CHAS  
**Source:**

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**80%-100% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	235	1,050	0
White	105	570	0
Black / African American	10	80	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	120	395	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

**Data** 2009-2013 CHAS  
**Source:**

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**Discussion**

Although severe housing problems were less prevalent than non-severe housing problems, their distribution continued to correlate strongly with income levels. Extremely low-income households had the highest frequency of severe housing problems across all racial and ethnic groups. Hispanic and African American populations in middle-income experienced disproportionately greater need in terms of housing problems, but these findings should again be treated carefully considering the small populations and the limited sample size of the data.



**NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction:**

Per HUD definitions, a “disproportionate need” exists when any group has a housing need that is 10% or higher than the jurisdiction as a whole. A household is considered cost burdened when they are paying more than 30% of their income towards housing costs, including utilities. This section analyzes the extent of cost burden and identifies populations that are disproportionately affected.

While White renters and homeowners report the greatest number of housing problems, by virtue of their larger numbers in the total population. American Indian/Alaska Natives renters and homeowners are disproportionately represented among those with problems, including those with serious housing problems.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	7,240	2,390	1,645	140
White	4,165	1,100	950	90
Black / African American	470	370	160	0
Asian	100	40	10	0
American Indian, Alaska Native	15	0	20	0
Pacific Islander	0	0	0	0
Hispanic	2,475	885	455	44

**Table 21 – Greater Need: Housing Cost Burdens AMI**

**Data** 2009-2013 CHAS

**Source:**

**Discussion:**

According to the 2018 National Low-Income Coalition, people earning the state minimum wage which is higher than the federal minimum wage have to work 83 hours per week to afford the median rent in their community of residence. Housing cost as a high percentage of income is prevalent throughout the City of Dalton. People Cost burden, housing affordability, and the need

for higher household income levels affect many. This need is greatest among White, African American and Hispanic households.

The number of housing problems among renter households is almost evenly split between those with a moderate cost burden and those with a severe cost burden. Though White and African American households report the greatest number of problems. The percentage of African-American households reporting severe cost burden is well in excess of that group's percentage of the population, and the percentage of households identifying as Hispanic is slightly above its percentage.

### **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

#### **Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

The disproportionately greater need analysis is not necessarily reflective of the number of households in need. Rather, the analysis determined whether any one racial or ethnic group has a need which is disproportionately greater than all the households in that income group. A disproportionately greater need exists when the percentage of households in a category of need who are members of any one racial or ethnic group is at least 10% higher than the percentage of households in the category. The CHAS data reflects that a large percentage of the Hispanic population is listed as a disproportionately greater need than the needs of that income category as a whole.

#### **If they have needs not identified above, what are those needs?**

The DWCDC has continued to provide services for Hispanic populations in regards to their housing needs. While working one on one with individual households, the housing counselors do their best to determine all of the household needs and to refer them to the appropriate resources that can help address the need. Special events are created to target the Hispanic community to provide much needed information. Newspaper articles and advertisements about housing issues and potential solutions are published on a regular basis.

#### **Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

To determine the location of minority concentrations with disproportionately greater needs, low and moderate-income areas (block groups where more than 51% of the households are low and moderate-income) were compared with areas of minority concentration. Areas of minority concentration are block groups where populations of minority racial or ethnic groups are at least 10% greater than for the city as a whole. LMI areas with minority concentrations indicate where these disproportionately greater needs are located.

Many Hispanic households chose to locate within inner city neighborhoods due to transportation issues and the close proximity to services and resources. The updated Dalton Urban Redevelopment Plan has identified an area of a very high percentage of Hispanic households. Dalton has identified these areas and continues to commit resources to improve these areas and better serve these populations. The Housing Authority tenants comprise 53% Hispanic.

**NA-35 Public Housing – 91.205(b)**

**Introduction**

The City does not own or manage any public housing. The Dalton Housing Authority is a separate legal entity that oversees public housing within the City’s jurisdiction.

**Totals in Use**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	0	0	0	0	0	0

**Table 22 - Public Housing by Program Type**

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Data** PIC (PIH Information Center)  
**Source:**

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	0	0	0	0	0
Average length of stay	0	0	0	0	0	0	0	0
Average household size	0	0	0	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	0	0	0	0	0
# of Disabled Families	0	0	0	0	0	0	0	0
# of Families requesting accessibility features	0	0	0	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data** PIC (PIH Information Center)  
**Source:**

**Race of Residents**

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	0	0	0	0	0	0
Black/African American	0	0	0	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian, Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 24 – Race of Public Housing Residents by Program Type**

**Data** PIC (PIH Information Center)

**Source:**

**Ethnicity of Residents**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	0	0	0	0	0	0
Not Hispanic	0	0	0	0	0	0	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

Table 25 – PIC (PIH Information Center)

Ethnicity of  
Public  
Housing  
Residents by  
Program  
Type

**Source:**

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The most pressing need for the public housing tenants and application on the waiting list for accessible units consist of lower utility costs. High utility costs for tenants drastically impacts their living ability. High utility costs burden faced by low-income can lead low income residents to fall behind on their utility bill payments, often resulting in high levels of arrearages, collection actions by the utility, payment negotiations, service terminations, and reconnections.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The HACD has two different types of waiting lists for affordable housing:

1. Waiting list by room size: 35 persons
2. Waiting list by central air/heat: 25 persons
3. Waiting list for no air/heat: 10 persons

Most immediate needs of residents is housing and once that need is met the second most pressing need is high utility cost burdens. Other needs include help increasing their incomes through job training, financial literacy, credit score improvement, and financial help to afford the region's housing costs and move toward self-sufficiency. According to the needs assessment workshop, these residents also expressed a need for more affordable childcare and more affordable housing options.

**How do these needs compare to the housing needs of the population at large**

The inflated cost of housing and utility rate poses a challenge for many of the City's residents, but the needs are more acute among public housing residents. Compared to the general population, public housing residents have an increased need.



## **NA-40 Homeless Needs Assessment – 91.205(c)Introduction:**

The City of Dalton used all HMIS data for persons who were enrolled in a homeless program in the city at any point in the 2017-2018 program year. The calculations listed in the tables below are lower than actual numbers of homeless persons because HMIS coverage is incomplete across the city. Not all homeless service agencies utilize HMIS. Agencies not receiving federal funds are not required to do so. In January 2017, Georgia's Department of Community Affairs conducted a Homeless Count using the following categories to define homelessness:

- Literally Homeless:
  - Sheltered Homeless: lives in emergency shelter, transitional housing for the homeless or a hotel or motel with the stay being paid for by an organization.
  - Unsheltered Homeless: lives in a car, park, abandoned building, encampment, dilapidated building, on the sidewalk, or similar location.
- Imminently Homeless: is facing loss of housing within two weeks, has no subsequent residence identified, and lacks the resources or support networks needed to obtain other permanent housing.
- Other Homeless: in jail, a hospital, or a detox program

### **For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**

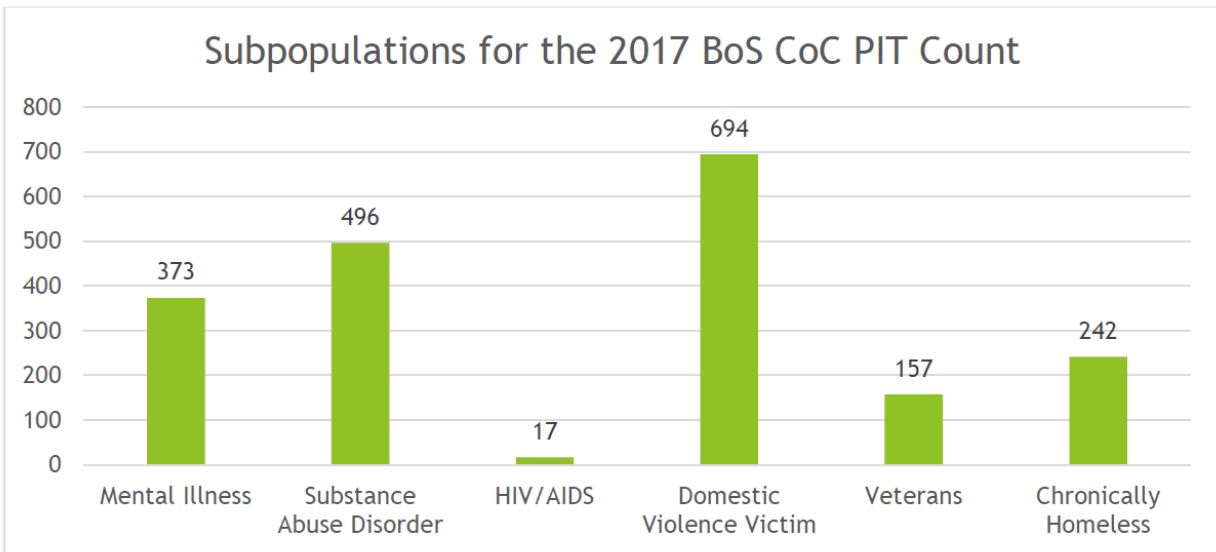
The 2017 Point-in-Time count reported 106 sheltered persons and 17 unsheltered for a total of 123. The sheltered homeless counts in the BoS CoC have remained fairly constant over the past 7 years, but there have been some fluctuations this year; the BoS CoC experienced an 11.7% increase in the number of people staying in emergency shelters in our CoC on PIT night.

From 2013 to 2015, there was a 34% decrease in the number of unsheltered homeless. This downward trend has continued, and for the 2017 count we experienced a decrease in the number of unsheltered homeless in the Balance of State CoC by 47%.

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):.**

People with special needs are the most vulnerable subset of the homeless population. According to the data collected for the 2017 PIT count, 6.5% of people experiencing homelessness are chronically homeless, meaning that they have a disability and have been homeless for at least

one year, or 4 times in the past 3 years. Four percent of the homeless population observed in January of 2017 were veterans.



**Nature and Extent of Homelessness (Optional)**

Race:	Sheltered	Unsheltered (optional)
White	50	8
Black or African American	56	9
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>		
Hispanic ⓘ	15	2
Not Hispanic ⓘ	0	0

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

This information is not available specifically for the City of Dalton through the Point in Time Count.

**Describe the nature and extent of homelessness by racial and ethnic group.**

The majority of the CoC's homeless population identifies as Black or African American. Six percent identify as Hispanic or Latino. Children under the age of 18 comprise 23% of the homeless population, and 8% are between the ages of 18 and 24.

**Describe the nature and extent of unsheltered and sheltered homelessness.**

Fifty-five percent of the total homeless population in the BoS CoC is male; however, that percentage does differ when it is broken down by homeless status. Men are more commonly experiencing unsheltered homelessness.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

Non-homeless special needs characteristics describe the various subpopulations of the City who are not homeless but may require supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with HIV/AIDS, persons with alcohol or drug addiction, victims of domestic violence, persons with a criminal record, those who have limited English proficiency, and those who are transportation disadvantaged. Persons belonging to this population may have additional needs before, during, and after an incident in functional areas including but not limited to: maintaining independence, communication, transportation, supervision, and medical care. The section below will describe why identifying the characteristics and needs of these sub-populations is essential to the planning process for these federal dollars.

### **Elderly and Frail Elderly**

Elderly and frail elderly are often unable to maintain existing homes or to afford rent. They are often over-housed in homes that have more square footage than the elderly homeowner or renter can maintain on limited budgets. Housing cost burden-related issues are often compounded by the requirement of additional services it takes for elderly and frail elderly to age in place. These services may include costly medical and other daily living assistance services. The Department of Aging and Adult Services provides seniors with several programs to prevent the institutionalization of seniors including visiting nurses, home delivered meals, and emergency response programs.

### **Persons with Developmental Disabilities**

Persons with developmental disabilities are individuals with mental or physical disabilities or a combination of mental and physical conditions resulting in significant impairments to daily functioning, including mental retardation, autism, traumatic brain injury, fetal neurological disorders, epilepsy and cerebral palsy. The disability's origin is in the brain and is usually established early in life and the disability must be expected to last indefinitely. There is clearly a need for more services to help developmentally disabled persons stay with their families as well as additional housing and residential facilities; other needed services include vocational services, social and community involvement, and transportation.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

The primary housing and supportive needs of these subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug

addiction, victims of domestic violence, and persons with a criminal record and their families) were determined by input from both service providers and the public through the Needs Assessment survey, public meetings, and stakeholder interviews. These needs include affordable, safe housing opportunities in areas with access to transportation, commercial and job centers, social services, and for education regarding fair housing rights and actions that can be taken in the event those rights are violated. Persons with disabilities often require accessible features and ground floor housing units. Victims of domestic violence need safe housing, removal of barriers to relocation, and for perpetrators to be held accountable.

Many of the supportive service needs of these subpopulations are available through existing nongovernmental organizations. These agencies have formed a coalition to collaborate in distributing serve the various special needs subpopulations more efficiently and comprehensively. This coalition also educates the City's agencies and nonprofits to aid in serving these subpopulations.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

**Persons living with HIV/AIDS**

Case surveillance data supplies the basis for understanding the burden of HIV and is used to guide public health action at the federal, state, and local levels. Knowing how many people are diagnosed with HIV infection each year, and their stage of disease at diagnosis, is important for planning and resource allocation and for monitoring trends and disparities between groups. Similarly, monitoring HIV incidence is critical for distributing resources and evaluating the effectiveness of HIV testing and other prevention programs. Improved surveillance methods allow resources to be better directed for programs and resources to the populations most affected.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

The City of Dalton is committed to supplying a suitable living environment. This community is an advanced suburban area that experiencing major growth and revitalization of existing areas. Through community forums and the needs assessment survey, the following priority needs were identified as public facility needs:

- Community Parks/Recreation Centers/Cultural Centers
- Youth Centers and Senior Centers

For this 5-year plan period, it is expected that the city will need both types of facility work to help boost its economy. Needs to be addressed include senior centers, homeless facilities, youth centers, child care facilities, neighborhood centers, parks/recreation, parking improvements, historic preservation (non-residential) and other public facilities.

### **How were these needs determined?**

Public facility needs were identified in through a series of community meetings and input from municipal officials, interviews with stakeholders, and a Needs Assessment survey distributed to the public. Other resources consulted were prior plans and progress reports from the City and other agencies that serve the City. Needs are also based on ongoing revitalizations initiatives that are undertaken by the City.

### **Describe the jurisdiction's need for Public Improvements:**

Public improvements are essential to the quality of life in the City of Dalton. Adequate sewer, safe water and excellent public safety services are basic to the function of every home and business in Dalton. In the past, the city built community facilities which enhanced the quality of life and also spurred new economic development opportunities. Continuous improvements are needed due to limited funding for these types of activities coupled with the age and the size of the City.

The following infrastructure components were identified while conducting the needs assessment:

- Public Facility Improvements
- Water/Sewer Improvements
- Flood Drainage Improvements

- Street Improvements
- Sidewalks
- Streets, Sidewalks and Wheelchair Curb Cuts
- Code Enforcement

**How were these needs determined?**

Public Improvement needs were identified in part, through a series of public meetings and hearings, input from municipal officials, interviews with stakeholders, and a Needs Assessment survey distributed to the public. Other resources consulted were prior plans and progress reports from the City and other agencies that serve the City. Needs are also based on ongoing revitalizations initiatives that are undertaken by the City.

**Describe the jurisdiction’s need for Public Services:**

Public Services have been identified as a need for low- and moderate- income households, including those at or below poverty levels, at risk of homelessness, unemployed or underemployed, physically challenged, aging, lacking access to health care, or lacking education or literacy skills. The following public service activities have been identified as a need in the county.

- Homeless/Emergency Shelter and Supportive Services
- Child Care Assistance
- Education and Life Skill Training
- Health Care
- Employment Training and Job Assistance
- More Jobs for Individuals with Barriers to Employment
- Handicapped Persons Services
- Senior Services
- Wi-fi Access for School Aged Children
- One Stop Shop Social Services
- Financial Assistance (Rent and Utilities)

**How were these needs determined?**

Public Service needs were identified through a series of public meetings and hearings, input from municipal officials, interviews with stakeholders, and a Needs Assessment survey distributed to the public. Other resources consulted were prior plans and progress reports from the City and other agencies that serve the City. Needs are also based on ongoing revitalizations initiatives that are undertaken by the City.

## Housing Market Analysis

### MA-05 Overview

#### Housing Market Analysis Overview:

The housing market analysis contained in this report was developed by using primarily using data from the American Community Survey, CHAS, the Housing Authority of the City of Dalton, and other sources noted in the tables. The following information is based on the Census' American Community Survey 2008-2012. Numbers shown represent the City of Dalton. The total number of housing structures shown in the "All Residential Properties by Number of Units" table includes mobile homes and recreational vehicles, some of which may not be considered housing units by HUD. Of the estimated 36,853 housing units in the City, the majority 26,139 or 71% are single unit and detached structures. The rest is divided into single unit attached structures and multiple unit apartment buildings.

Data provided by the 2009-2013 ACS, as shown in following tables reveals 71% of the City's housing stock was of single-family configuration with attached and detached unit structures. The remaining housing stock was in a variety of multi-family configurations, ranging from 2- 4-unit structures to structures with 20 or more units. According to the 2012 ACS, the City's housing stock held 36,853 (71%) single family units; 1,179 (3%) with 2- 4 units; 6,670 (18%) with 5-19 units; and 2,809 (8%) of the housing stock with 20 or more units. The City also had 56 (less than 1%) mobile home structures in its inventory.



## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

The following tables reflect the cost of both owner and renter-occupied housing in the City of Dalton. These tables use 2009-2013 ACS data from HUD’s eCon software. There have been significant changes in housing prices in recent years which are not fully captured in this data and will be discussed at the end of this section.

The housing stock in the City of Dalton is principally single-family and owner-occupied (76%). Of the 5,250 owner-occupied units in the City, 76% consist of three or more bedrooms. While renter-occupied units only consist of 24% of three or more bedrooms. No bedroom and one and two-bedroom units are the smallest category of owner-occupied housing, but the majority of renter households live in these types of units.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	6,275	47%
1-unit, attached structure	595	4%
2-4 units	1,970	15%
5-19 units	3,275	25%
20 or more units	1,010	8%
Mobile Home, boat, RV, van, etc	220	2%
<b>Total</b>	<b>13,345</b>	<b>100%</b>

**Table 26 – Residential Properties by Unit Number**

**Data** 2009-2013 ACS

**Source:**

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	35	1%	445	7%
1 bedroom	85	2%	1,215	20%
2 bedrooms	1,160	22%	2,995	49%
3 or more bedrooms	3,970	76%	1,500	24%
<b>Total</b>	<b>5,250</b>	<b>101%</b>	<b>6,155</b>	<b>100%</b>

**Table 27 – Unit Size by Tenure**

**Data** 2009-2013 ACS

**Source:**

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

The City does not own or manage any public housing. The Housing Authority of the City of Dalton (HACD) is a separate legal entity that oversees public housing within the City's jurisdiction that owns and operates 586 units of public housing in 14 locations with a total of 186 buildings. The HACD has 90 units in maintenance and 12 out of service units that CDBG funding will be solicited to assist in undertaking renovations.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

The City does not expect to lose any affordable housing units from the inventory during this Consolidated Plan period. The HACD plan is to revitalize and keep all of these units and bedrooms unless the units have outlived their usefulness and are obsolete in regard to a physical condition, making it unsuitable for housing purpose and no reasonable modifications are cost effective.

**Does the availability of housing units meet the needs of the population?**

Census data was used to assess the ability of the City's current housing stock to meet the needs of its population. As a result, it was clear that the City's existing housing stock does not fully meet the needs of the existing population with 24.7% of homeowners with a mortgage and 49.8% of renters spending more than 30% of their income on monthly housing costs. The CHAS data analyzed in the Needs Assessment, reflects more renters than owners experience one or more housing problems. However, cost-burden is a problem for both owners and renters, in which affordability is a major barrier for most residents in the City renters and homeowners.

**Describe the need for specific types of housing:**

The City of Dalton needs more 2-4 unit types which can provide opportunities for affordable and home ownership, and more small-scale multi-family housing for low and moderate income households and individuals. The shortage of affordable rental housing units places a financial hardship on extremely low income households. Residents with disabilities also need affordable, accessible housing to lead integrated lives.

To adequately serve households with special needs, such as persons with disabilities and victims of domestic violence, households with children that are at-risk of homelessness and formerly homeless households, different types of housing may be needed than what exists throughout the City.

**Discussion**

The evaluation of substandard housing stock in the Market Analysis Section will direct considerations in programming activities to address specific types of housing needs in the City. Based on the data noted in this section, there is not sufficient affordable housing stock that matches the economic challenges of an aging housing stock.

**MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)**

**Introduction**

The following tables reflect the cost of both owner and renter-occupied housing in the City of Dalton. These tables use 2009-2013 ACS data from HUD’s eCon software. The HUD-provided table below indicates the number of affordable units available to households with various income levels. The median home value in the City of Dalton has decreased by 15% between 200-2013, while the rent for homes has increased by 6% for the same period.

There have been changes in housing prices in recent years which are not fully captured in this data and will be discussed at the end of this section. The table reflecting the amount of rent paid by residents of the City shows that 55% of rental units rent for between \$500 and \$999 per month, while 43.4% rental units rent for less than \$500 per month. The Housing Affordability table also shows that there were 265 renter units available to households earning below 30% of the City’s HUD Area Median Family Income (HAMFI).

**Cost of Housing**

	Base Year: 2000	Most Recent Year: 2013	% Change
Median Home Value	144,100	122,500	(15%)
Median Contract Rent	509	541	6%

**Table 28 – Cost of Housing**

**Data** 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

**Source:**

Rent Paid	Number	%
Less than \$500	2,675	43.4%
\$500-999	3,390	55.0%
\$1,000-1,499	80	1.3%
\$1,500-1,999	0	0.0%
\$2,000 or more	10	0.2%
<b>Total</b>	<b>6,155</b>	<b>99.9%</b>

**Table 29 - Rent Paid**

**Data** 2009-2013 ACS

**Source:**

## Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	265	No Data
50% HAMFI	1,355	365
80% HAMFI	4,450	1,375
100% HAMFI	No Data	1,939
<b>Total</b>	<b>6,070</b>	<b>3,679</b>

**Table 30 – Housing Affordability**

**Data** 2009-2013 CHAS

**Source:**

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$556.00	\$635.00	\$730.00	\$1,007.00	\$1,091.00
High HOME Rent	\$563.00	\$597.00	\$696.00	\$878.00	\$960.00
Low HOME Rent	\$472.00	\$506.00	\$607.00	\$701.00	\$943.00

**Table 31 – Monthly Rent**

**Data** HUD FMR and HOME Rents

**Source:**

### Is there sufficient housing for households at all income levels?

A significant lack of affordable housing exists particularly for households that are at the low or very-low income levels. Based on 2017 ACS data there are an estimated 3,615 very-low income households in that earn less than \$24,999 annually, but there are only 265 affordable rental units at 30% AMI, and 365 affordable owner-occupied units at 50% AMI.

### How is affordability of housing likely to change considering changes to home values and/or rents?

According to the table above, between 2000 and 2013 the median home value decreased by 15% and the median contract rent in Dalton increased by 6%. Over the same time period, the median household income has only increased in terms of real dollars by 1% for households. This means that housing has become less affordable overall during the past thirteen years. If these trends continue, then housing affordability will become an even higher barrier for most City residents.

**How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Using data from Table 36 provided by HUD, Fair Market rents are comparable to HOME rents when considering efficiency, one or two bedroom apartments. FMR is \$556 for an efficiency and \$635 for a one-bedroom in this community; Low HOME rents for 1-bedroom is \$127 less than the low measure and equal to the high measure. This apartment size likely reflects the needs of the elderly, mentally and physically disabled or LMI single workers in the region that are supported by area services.

That same data from Table 36 also shows a slightly larger gap between HOME rents and FMR when considering larger apartments, especially 3-4 bedrooms. The comparison of Fair Market Rent to the Low HOME rent reflects a \$131 gap between the higher \$(960) FMR and a \$148 between the lower (\$943) HOME rent. Combined with a median contract rent of under \$509, large families or families with children who must rent face both limited housing choices in this market and a higher cost.

## **MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)**

### **Introduction**

The age and condition of a jurisdiction's housing stock are important variables in assessing the overall characteristics of a local housing market. This section will review important data about the city's housing stock. The older housing stock, particularly older rental housing often has code and deferred maintenance issues that can impact the longevity of the housing structure which in turn impacts the housing supply in terms of accessibility and affordability.

The following tables reflect the year housing units were built for both owner-occupied and renter-occupied. An assessment of the age of residential structures is helpful in evaluating physical condition. According to American Community Survey data, over 28% of all housing units are over 60 years old. As the community's housing units continue to age, increased investment for maintenance, repairs, rehabilitation and replacement will be needed to maintain the quality of living conditions and prevent deterioration of neighborhoods.

As listed in Table 37, 70% of owner-occupied units and 48% renter-occupied units had no selected conditions (housing problems as defined by HUD). However, 28% of owner-occupied households and 48% of renter-occupied households were found to have one selected Condition.

### **Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation:"**

The City defines "standard conditions" as a housing unit that meets all the state and local codes. A unit defined as "substandard condition but suitable for rehabilitation" is in poor condition but structurally feasible for rehabilitation.

The Condition of Units are categorized under four separate housing problems, such as:

- housing unit lacks complete kitchen facilities
- housing unit lacks complete plumbing facilities
- a household is overcrowded;
- a household is cost burdened.

A household that has any one or more of these four problems are labeled as a household with housing problems.

When households spend too much of their incomes on housing, they are considered to be cost burdened or severely cost burdened. Using definitions established by HUD, cost burden is calculated as gross housing costs, including utility costs, as a percentage of gross income. Households that pay more than 30% of their incomes on housing are considered cost burdened; households that pay more than 50% of their incomes are considered to be severely cost burdened. Overcrowding is defined by HUD as 1.01 to 1.50 persons per room, while severe overcrowding is 1.51 or more persons per room.

The U.S. Census estimates the total number of substandard units in a geographic area by calculating both owner- and renter-occupied units: 1) lacking complete plumbing facilities, 2) lacking complete kitchen facilities, and 3) 1.01 or more persons per room (overcrowding). The U.S. Census defines “complete plumbing facilities” to include: (1) hot and cold piped water; (2) a flush toilet; and (3) a bathtub or shower. All three facilities must be located in the housing unit.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,445	28%	2,950	48%
With two selected Conditions	120	2%	280	5%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	3,675	70%	2,930	48%
<b>Total</b>	<b>5,240</b>	<b>100%</b>	<b>6,160</b>	<b>101%</b>

Table 32 - Condition of Units

Data 2009-2013 ACS

Source:

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,224	23%	935	15%
1980-1999	1,585	30%	2,140	35%
1950-1979	2,000	38%	2,600	42%
Before 1950	425	8%	495	8%
<b>Total</b>	<b>5,234</b>	<b>99%</b>	<b>6,170</b>	<b>100%</b>

Table 33 – Year Unit Built

Data 2009-2013 CHAS

Source:

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	2,425	46%	3,095	50%



Housing Units build before 1980 with children present	1,410	27%	555	9%
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**Table 34 – Risk of Lead-Based Paint**

**Data** 2009-2013 ACS (Total Units) 2009-2013 CHAS (Units with Children present)

**Source:**

**Vacant Units**

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	1638	0	1638
Abandoned Vacant Units	66	0	66
REO Properties	23	0	23
Abandoned REO Properties	1	0	1

**Table 35 - Vacant Units**

**Need for Owner and Rental Rehabilitation**

The age of the housing stock in the City will continue to have a significant impact on general housing conditions in the area. The 2017 ACS data shows that 45% of the City’s housing stock was built prior to 1970. Owner and renter households, especially those found in low income target neighborhoods will need rehabilitation aid to support their homes. As housing ages, maintenance costs rise, which can present significant costs for low- and moderate- income homeowners. This also poses a threat to low- and moderate- income tenants who are not able to support close communications with their property owners or property managers who may be out of state when repairs are required.

**Estimated Number of Housing Units Occupied by Low-or Moderate-Income Families with LBP Hazards**

Exposure to lead-based paint is one of the most significant environmental threats from a housing perspective. Lead is a highly toxic metal that may cause a range of health problems for adults, and especially for children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings. It is typical for residential properties built before 1978 have lead-based paint. Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. HUD regulations on lead-based paint apply to all federally assisted housing. Low-income households that earn between 30-50% Median Family Income (MFI) are least able to afford well maintained housing and, therefore, are often at greater risk of lead poisoning. According to the 2017 ACS data, the City of Dalton has 2,102 (16.3%) of housing units built before 1978 that may be at risk for lead exposure. This number is a decrease from the previous Consolidated Plan due to an error in calculating households at risk of lead-based paint for housing built before 1980 instead of 1978.

## Discussion

### Broadband and Resiliency Requirements

On January 17, 2017, HUD published the Broadband and Resiliency requirements for all Consolidated Plans submitted after January 1, 2018. This rule amends HUD's Consolidated Plan regulations to require that local jurisdictions, such as the City of Dalton, to consider two additional concepts in consolidated planning efforts. The first concept is how to address the need for broadband access for low and moderate-income residents in the communities they serve. The second concept added to the Consolidated Plan process requires local jurisdictions to consider incorporating resilience to natural hazard risks into development of the plan. Jurisdictions should also take care to anticipate how risks will increase due to climate change to begin addressing impacts of climate change on low- and moderate-income residents.

Specifically, the rule requires that States and localities that submit a Consolidated Plan describe the broadband access in housing occupied by low- and moderate-income households. If low income residents in the communities do not have such access, States and jurisdictions must consider providing broadband access to these residents in their decisions on how to invest HUD funds.

HUD defines the term of "broadband" as high-speed, always-on connection to the Internet or also referred to as high-speed broadband or high-speed Internet.

To comply with HUD's broadband and resiliency requirements, the City has incorporated actions into the consolidated plan process by:

- Including a description of broadband needs and vulnerability to natural hazard risks in the housing market analysis.
- For broadband: contacted public and private organizations, including broadband internet service providers, and organizations engaged in narrowing the digital divide.
- For resilience: contacted agencies whose primary responsibilities include the management of flood prone areas, public land, or water resources, and emergency management agencies.

### Narrowing the Digital Divide

For many Americans, access to computers and high-speed Internet connections in an integral part of their everyday lives. As most of information, services, and resources have transitioned to online access, digital inequality has a direct impact on low income household's social inequality. According to HUD's Office of Policy Development, in the *Digital Inequality and Low-Income Households* Report, the disparate access to broadband can correlate with the inequality of income, education, race, and ethnicity.

As part of the 2008 Broadband Data Improvement Act, the U.S. Census Bureau began asking about computer and Internet use in the 2013 American Community Survey (ACS). Federal agencies use these statistics to measure and monitor the nationwide development of broadband networks and to allocate resources intended to increase access to broadband technologies, particularly among groups with traditionally low levels of access.

Historical ACS estimates for the City of Dalton reflects the households' access to broadband internet subscriptions has steadily increased by 5% between 2014 and 2016 to achieve a total overall broadband internet subscription rate of 95% of all residents in Dalton.

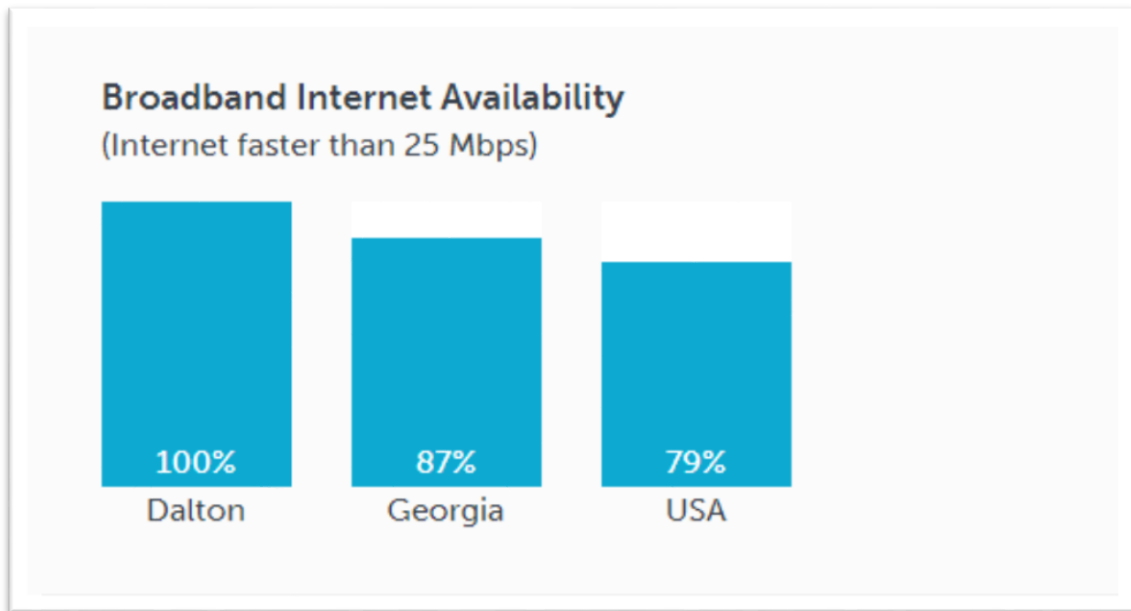
#### Computer and Internet Use in the City of Dalton

	2015		2016		2017	
	Estimate	%	Estimate	%	Estimate	%
Total:	11,284	100%	11,293	100%	11,224	100%
Has a computer:	9,229	82%	9,747	86.31%	8,908	79.37%
With dial-up Internet subscription alone	82	1%	0	0.00%	33	0.29%
With a broadband Internet subscription	7,841	69%	9,276	82.14%	8,174	72.83%
Without an Internet subscription	1,306	12%	471	4.17%	701	6.25%
No computer	2,055	18%	1,546	13.69%	2,316	20.63%

**Source:** American Community Survey Reports, U.S. Census Bureau, [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_16\\_SPL\\_K202801&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_16_SPL_K202801&prodType=table)

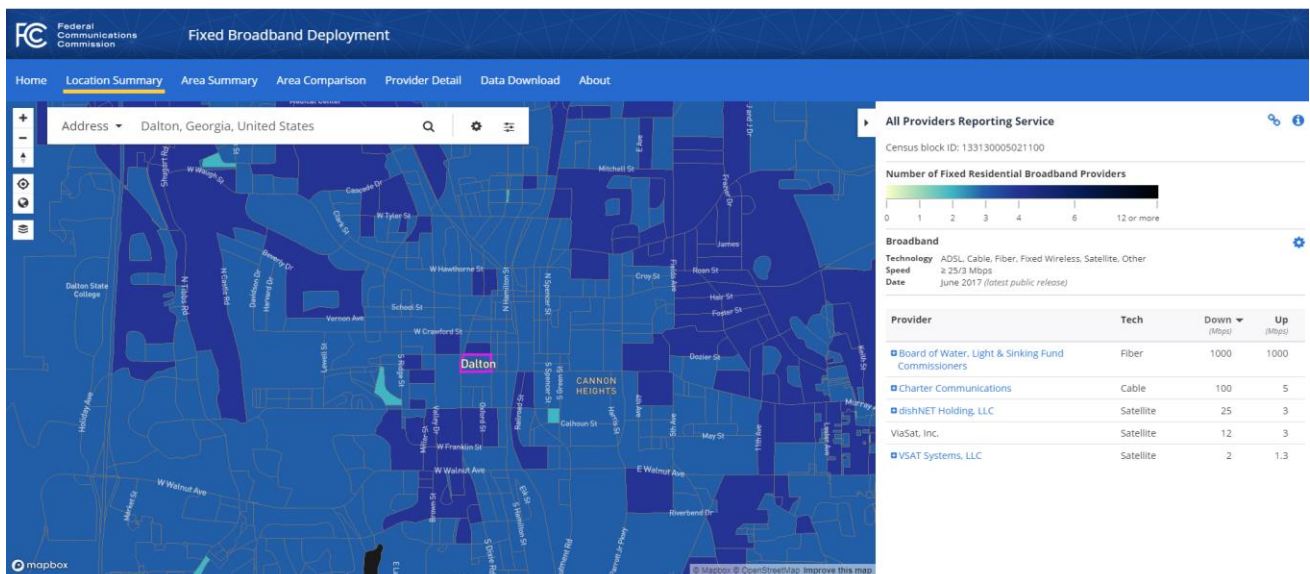
While historical ACS estimates reflect that more than 94 percent of the population has a broadband subscription, research data from High Speed Internet indicates that the City has 100 percent broadband internet availability with 100 percent coverage for cable and 99 percent coverage for Digital subscriber line (DSL). The City's broadband access is more than 13 percent

higher than the State and 21 percent higher than the total US. The City’s roadband access is mainly served by four wired providers, Spectrum, Viasat, Windstream and Dalton Utilities.

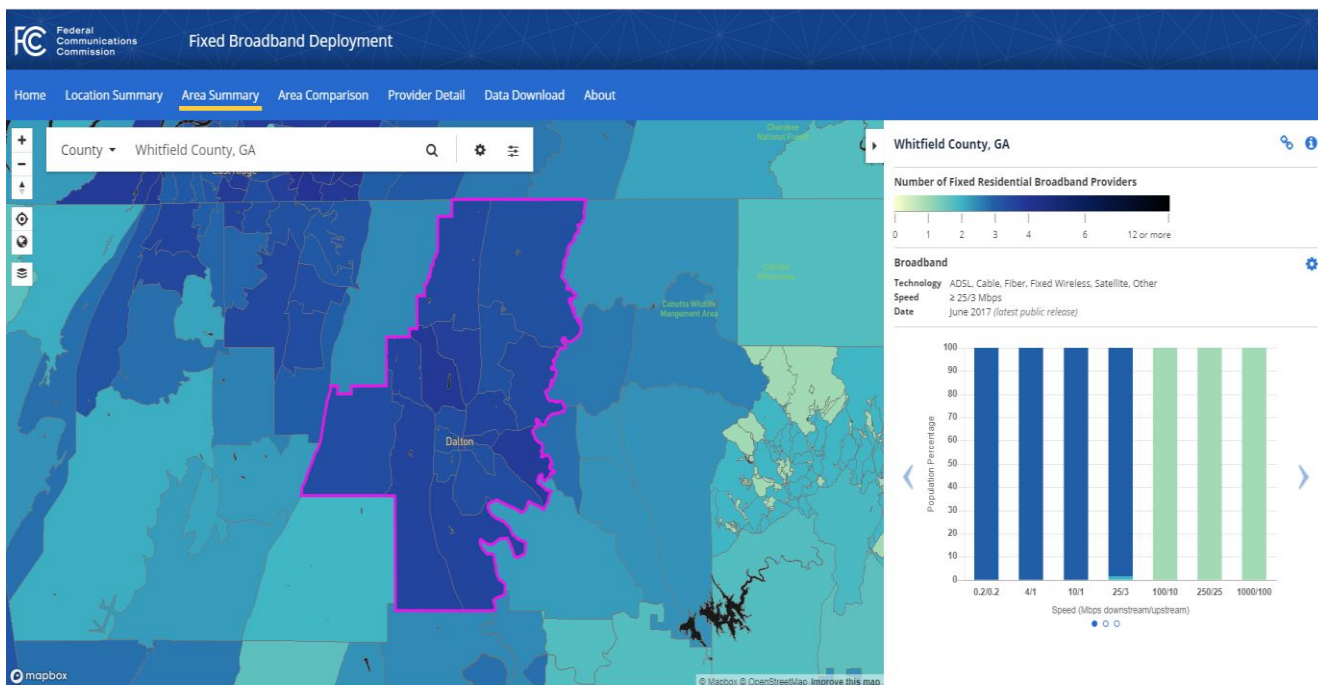


Source: High Speed Internet

The map below displays data showing the number of providers reporting residential fixed broadband service in the city. The map displays the population-weighted average number of broadband providers city level. This map shows all technologies and broadband at a speed of at least 25 Mbps downstream/3 Mbps upstream.



Source: Federal Communications Commission, <https://broadbandmap.fcc.gov>



The City of Dalton has broadband availability throughout the city and just over two percent of the population does not have broadband access. According to a 2015 Pew Research Center survey, 43 percent of all U.S. adults age 18 and older cited cost as the most important reason for not having home broadband service; 33 percent cited the monthly subscription cost as the main barrier, and 10 percent stated that a computer was too expensive. Additionally, 12 percent of nonadopters stated that their smartphone was sufficient, 10 percent responded that they had other options to get online outside the home, and 5 percent stated that Internet service was either unavailable or insufficient.

To assist the City in meeting the need for broadband some service providers have qualifying low-cost broadband services. For example, some Internet service to qualifying households who meet the following characteristics:

- With at least one resident who participates in the U.S. Supplemental Nutrition Assistance Program (SNAP).

### Hazard Mitigation

*Hazard mitigation* is any action taken to permanently eliminate or reduce the long-term *risk* to human life and property from natural and technological *hazards*. It is essential element of emergency management along with preparedness, response and recovery. The City of Dalton is a part of the Whitfield County Hazard Mitigation Plan, which is the lead county organization

responsible for providing management and coordination of mitigation, preparedness, response, and recovery activities within its area of responsibility. The main focus of the Hazard Mitigation Plan is on those hazards that are most likely to affect Whitfield County and the Cities of Dalton, Tunnel Hill, and Varnell, and the Town of Cohutta in the future.

The Hazard Mitigation Plan (HMP) was designed to protect both the unincorporated areas of the County as well as the Cities. Though the County facilitated this planning process, the Cities of Dalton, Tunnel Hill, and Varnell, and the Town of Cohutta provided critical input into the process.

According to the Whitfield County has experienced a number of hazard events throughout its history, most resulting in fairly localized damage. Flooding, tornados, winter storms, wildfire, severe thunderstorms, earthquakes, dam failure and hazardous materials to varying degrees represent known threats to Whitfield County. The Whitfield County Hazard Mitigation Planning Committee (HMPC) identified eight natural hazards the County is most vulnerable to based upon available data including scientific evidence, known past events, and future probability estimates. The HMPC also discussed how changes in the climate may in some ways impact the County, Cities and Towns.

## Vulnerability Assessment - Natural Hazards

HAZARD	Whitfield County	Dalton	Tunnel Hill	Varnell	Cohutta
<b>Severe Thunderstorms (includes lightning &amp; hail)</b>					
Frequency	H	H	H	H	H
Severity	H	H	EX	H	H
Probability	H	H	H	H	H
<b>Tornados</b>					
Frequency	M	M	L	M	M
Severity	EX	EX	EX	M	EX
Probability	H	H	H	M	H
<b>Flooding</b>					
Frequency	H	M	H	H	H
Severity	H	H	H	H	H
Probability	H	M	H	H	H
<b>Winter Storms</b>					
Frequency	H	H	H	M	H
Severity	H	EX	H	H	H
Probability	H	H	H	M	H
<b>Drought</b>					
Frequency	M	M	M	H	M
Severity	H	H	H	H	H
Probability	M	M	M	H	M
<b>Wildfire</b>					
Frequency	M	L	M	M	M
Severity	H	M	M	M	H
Probability	M	L	M	M	M
<b>Earthquake</b>					
Frequency	VL	VL	VL	VL	VL
Severity	M	M	M	L	M
Probability	L	L	VL	VL	L
<b>Dam Failure</b>					
Frequency	VL	VL	VL	VL	VL
Severity	EX	M	VL	VL	EX
Probability	VL	VL	VL	VL	VL
<b>Hazardous Materials Release</b>					
Frequency	M	M	M	H	M
Severity	EX	EX	H	H	EX
Probability	H	H	L	H	H
<b>Landslide</b>					
Frequency	VL	VL	VL	VL	VL
Severity	L	L	L	L	L
Probability	VL	VL	VL	VL	VL
<b>Tropical Cyclonic Events (Hurricanes &amp; Tropical Storms)</b>					
Frequency	NA	NA	NA	NA	NA
Severity	NA	NA	NA	NA	NA
Probability	NA	NA	NA	NA	NA
<b>Coastal Flooding</b>					
Frequency	NA	NA	NA	NA	NA
Severity	NA	NA	NA	NA	NA
Probability	NA	NA	NA	NA	NA
<b>Sinkhole</b>					
Frequency	NA	NA	NA	NA	NA
Severity	NA	NA	NA	NA	NA
Probability	NA	NA	NA	NA	NA

**Key for Table 2.2 – Vulnerability Assessment Frequency and Probability Definitions**

*Source: Whitfield County Hazard Mitigation Plan*

NA	=	Not applicable; not a hazard to the jurisdiction
VL	=	Very low risk/occurrence
L	=	Low risk; little damage potential (for example, minor damage to less than 5% of the jurisdiction)
M	=	Medium risk; moderate damage potential (for example, causing partial damage to 5-15% of the jurisdiction, infrequent occurrence)
H	=	High risk; significant risk/major damage potential (for example, destructive, damage to more than 15% of the jurisdiction, regular occurrence)
EX	=	Extensive risk/probability/impact

**Key for Table 2.2 – Vulnerability Assessment Severity Definitions**

	<u>Low</u>	<u>Medium</u>	<u>High</u>	<u>Extensive</u>
Tropical Cyclonic Events	<i>(See Wind &amp; Inland Flooding)</i>			
Wind – Wind Speed	38 MPH	39–50 MPH	50-73 MPH	73–91 MPH
Severe Thunderstorm	<i>(See Wind &amp; Inland Flooding)</i>			
Tornado - Magnitude	< EF3	EF3	EF4	EF5
Inland Flooding - Water depth	3" or less	3 – 8"	8-12"	12"+
Severe Winter Storms – Ice/ Sleet	½" or less	½ – 4"	4-7"	7"+
Severe Winter Storms - Snow	1" or less	1-6"	6-12"	12"+
Drought – Duration	1 year	1 – 2 years	2-5 years	5+ years
Wildfire - # of Acres	<50	50-110	110-200	200+
Earthquake - Magnitude	1-2	3	4	5+

*Source: Whitfield County Hazard Mitigation Plan*

Major threats to Whitfield County include tornados and thunderstorms. All areas within Whitfield County are vulnerable to the threat of a tornado and has a high exposure to potential damage from tornados. Additionally, severe thunderstorm, hail, and lightning events pose one of the greatest threats to Whitfield County in terms of property damage, injuries and loss of life. These



weather events represent the most frequently occurring natural hazard within Whitfield County and have a great potential to negatively impact the County each year.

### **Digital Divide & Hazard Mitigation Surveys**

In response to 81 FR 90997 (“Modernizing HUD’s Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards”), the City sent targeted surveys inquiring about efforts to close the digital divide and hazard mitigation and resiliency strategies during the development of the Consolidated Plan process.

The City issued specialized surveys targeting relevant stakeholders addressing climate change and hazard mitigation, and organizations addressing the digital divide.

### **CLIMATE CHANGE, HAZARD MITIGATION, AND RESILIENCY SURVEY**

1. Organization Name:
2. Does your organization produce land use hazard mitigation reports? If so, how frequently?
3. Does your organization maintain contact and/or coordinate with affordable housing developers?
4. How might strengthened connections with affordable housing developers assist you in your work?

### **DIGITAL DIVIDE SURVEY**

#### ***Survey 1: Digital Literacy Providers and Advocates***

1. Organization Name
2. Does your organization employ a digital literacy curriculum? If so, what does it include?
3. How can the City of Dalton support digital literacy in low-income households?
4. What obstacles have your organization identified as factors preventing broadband access to low-income households?
5. How would you recommend addressing the obstacles identified in question 4?

#### ***Survey 2: Broadband Providers***

1. How do you make your services accessible to low-income households?
2. To what extent do you currently offer broadband services to affordable housing developers?
3. What obstacles prevent your company from providing service in currently underserved areas?
4. How would you recommend addressing the obstacles identified in question 3?
5. As a partner, what can the City of Dalton do to support your provision of broadband to low-income households and/or affordable housing developments?

***Survey 3: Digital Divide Consultation***

1. Organization Name
2. How has your organization supported the provision of broadband service to low-income and/or underserved areas?
3. What obstacles have your organization identified as factors preventing broadband access to low-income households?
4. How would you recommend addressing the obstacles identified in question 3?

No responses were received from consultations with Broadband providers and the Whitfield County Hazard Mitigation Planning Committee.

**MA-25 Public and Assisted Housing – 91.210(b)**

**Introduction**

The City does not own or operate any public housing. The Housing Authority of the City of Dalton (HACD) is a separate legal entity that oversees public housing within the City’s jurisdiction.

**Totals Number of Units**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	0	0	0	0	0	0	0
# of accessible units	0	0	0	0	0	0	0	0	0

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 36 – Total Number of Units by Program Type**

**Data** PIC (PIH Information Center)

**Source:**

**Describe the supply of public housing developments:**

While the Housing Authority does not currently have any public housing developments, the do operate and maintain affordable units. Most of the units operated by the Dalton Housing Authority are in desperate need of renovation. Many of the duplexes were built in the late 1960s and haven’t had any major upgrades since they were built. The some of the units do not have central heat and air conditioning. In the last year, the Housing Authority has begun to conduct renovations to many of the units which included replacing doors, roof, windows, central heat and air, kitchen, bathrooms.

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

While the Housing Authority does not currently have any public housing developments, they do operate and maintain affordable units. Most of the units operated by the Dalton Housing Authority are in desperate need of renovation. Many of the duplexes were built in the late 1960s and haven't had any major upgrades since they were built. Some of the units do not have central heat and air conditioning. In the last year, the Housing Authority has begun to conduct renovations to many of the units which included replacing doors, roof, windows, central heat and air, kitchen, bathrooms.

The HACD receives no government (federal, state or local) funds for the support or operation of these facilities. The units range from 0 to 5 bedrooms and were constructed between 1951 and 1984. Of the 586 units, 440 are occupied, 56 units are out of service, and 90 are vacant. Many of these vacant units are in disrepair and would require \$2,000 to \$3,000 to repair to a state that is able to rent. There are only 100 units with central air conditioning; the rest of the units need a tenant-supplied window AC unit. The units house very low to moderate income persons. All units are located in a LMA.

**Public Housing Condition**

Public Housing Development	Average Inspection Score
N/A	N/A

**Table 37 - Public Housing Condition**

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

Since 2005, the Dalton Housing Authority has not participated in an approved Public Housing Agency Plan through HUD. However, the HACD has implemented a restoration and revitalization to maintain affordable units and bedrooms unless the units have outlived their usefulness and are obsolete in regard to a physical condition, making it unsuitable for housing purpose and no reasonable modifications are cost effective.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

The HACD's strategy for improving the living environments of low and moderate income families is to continually make energy efficient property upgrades and to improve the aesthetic of the units through HVAC upgrades and roofing repairs.

**MA-30 Homeless Facilities and Services – 91.210(c)**

**Introduction**

The following facilities have been identified as providing some form of homeless or housing assistance in Dalton. Several of these facilities were consulted as a part of the Needs Assessment process for the Con Plan.

- Dalton Whitfield Community Development Corporation
- NW GA Family Crisis Center
- Providence Ministries
- Carter Hope Center
- Action Ministries

**Facilities and Housing Targeted to Homeless Households**

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	32	0	24	3	0
Households with Only Adults	25	27	15	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 38 - Facilities and Housing Targeted to Homeless Households**

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

ESG, GA Balance of State (BoS) Continuum of Care (CoC) Program funds are used to address the needs of the homeless or near homeless in the City of Dalton. The need for emergency and transitional housing is addressed by using emergency shelters, extended stay economy motels, transitional housing, and rapid re-housing apartments with funding provided by the Georgia Department of Community Affairs (ESG, Bos CoC, and State Housing Trust Fund Programs). The existing shelter spaces are not adequate to meet the growing demand for housing for the homeless in Dalton.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

There are a myriad of comprehensive services that are available to the community as a whole, as well as persons experiencing homelessness. Homeless services providers will make every effort to connect participants with mainstream resources such as employment assistance, mental health counseling, healthcare assistance, transportation benefits, SNAP benefits, and addiction counseling.

Dalton's efforts to combat homelessness requires that the root economic causes of homelessness be addressed, which includes 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 City also supports the implementation of a referral and case management system with the tools to direct the homeless to appropriate housing and services. Some families or individuals may require only limited assistance for a short period of time, such as emergency food and shelter - until a first paycheck is received or a medical emergency is past. Others, however, will require more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Because resources are limited, it is important for the system to eliminate duplication of effort by local agencies, both in intake and assessment procedures, and in subsequent housing and supportive services. These principles suggest the need for common intake forms, shared data, effective assessment instruments and procedures, and on-going coordination of assistance among community organizations, which have been addressed with an improved Homeless Management Information System.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

Over the next Consolidated Plan period the City of Dalton will continue to work with the social service providers, such as Northwest Georgia Family Crisis Center and the Dalton-Whitfield Community Development Corporation to develop multiple funding resources and partnerships. The services benefit many different people with special needs.

### **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

The elderly and frail elderly have physical, medical, maintenance, social, emotional, and financial needs. Elderly and frail elderly are often unable to maintain existing homes or to afford rent. Housing cost burden related issues are often compounded by the requirement of additional services it takes for elderly and frail elderly to age in place. These services may include costly medical and other daily living assistance services. As the population continues to age, the need for age-related services increases. The housing assistance caseworkers are reliant upon frequent professional assessments, often times by a primary care physician, to fully understand and determine an appropriate action and accommodations. Access is particularly important for the physically handicapped. Physically disabled persons often require specially designed dwellings to permit access both within the unit, as well as to and from the site.

Persons with mental and developmental disabilities often need alternative living arrangements that may include supervision, in-home support services, respite services, transportation services, day program services, educational services, and supported employment services.

The DHA provides housing for low income seniors and disabled individuals. The affordable housing programs offered by the DHA have a number of characteristics of interest to that segment of the affordable housing market. Unfortunately there is often a waiting list for this program, and it can be as long as several months.

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Public systems or institutions (i.e. jails, prisons, hospitals, child welfare, mental health facilities, etc.) often release individuals directly into homelessness. For homeless families with children, a centralized intake is in place that seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. Dalton-Whitfield Community Development Corporation will continue to work closely with hospitals to make sure that hospital social workers have appropriate discharge protocols and are not routinely discharging patients to the streets or emergency shelter.



**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The City will continue to work closely with Northwest Georgia Family Crisis Center and the Dalton-Whitfield Community Development Corporation and other local agencies to provide housing and supportive services needs for persons who are not homeless but may have other special needs through coordination and potentially identifying eligible funding sources.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

During this Consolidated Plan period, the City will assess the housing and supportive needs with respect to persons who are not homeless or who may have special needs in an effort to utilize CDBG funding more effectively to address the needs of non-homeless persons with special needs.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The City's housing market presents significant impediments to development of an adequate supply of affordable housing for low to moderate-income people. Loss of major manufacturing employment opportunities coupled with rising construction costs has created a significant barrier to affordable housing. The City's Analysis of Impediments to Fair Housing Choice (AI) (2019) examined a number of areas in which barriers to the development of affordable housing might exist. The contributing factors identified in the AI and over the course of the outreach for the development of this Consolidated Plan, include:

- Historical patterns of racial and ethnic segregation persist in Anniston today as a result of a combination of different factors. As residents of segregated neighborhoods move to other areas, those left behind are increasingly those without the means to move themselves.
- R/ECAPs are the city's primary areas of segregation and the communities located in these areas are in need of reinvestment.
- Members of some protected classes are disproportionately affected by certain housing problems, particularly by cost burden.

**MA-45 Non-Housing Community Development Assets – 91.215 (f)**

**Introduction**

In determining priorities for the allocation of federal funds, the City Dalton has recognized the need to foster a competitive local economy that expands economic opportunities for present and future residents. This section describes the local workforce, the nature of current employment, and activities that coordinate economic development activities across local and regional agencies.

**Economic Development Market Analysis - Business Activity**

<b>Business by Sector</b>	<b>Number of Workers</b>	<b>Number of Jobs</b>	<b>Share of Workers %</b>	<b>Share of Jobs %</b>	<b>Jobs less workers %</b>
Agriculture, Mining, Oil & Gas Extraction	51	23	0	0	0
Arts, Entertainment, Accommodations	1,064	2,170	9	7	-2
Construction	378	688	3	2	-1
Education and Health Care Services	1,138	3,732	9	12	2
Finance, Insurance, and Real Estate	314	644	3	2	-1
Information	82	151	1	0	0
Manufacturing	4,836	10,678	40	33	-6
Other Services	177	493	1	2	0
Professional, Scientific, Management Services	696	3,100	6	10	4
Public Administration	0	0	0	0	0
Retail Trade	1,363	5,309	11	17	5
Transportation and Warehousing	539	1,579	4	5	1
Wholesale Trade	649	1,858	5	6	0
<b>Total</b>	<b>11,287</b>	<b>30,425</b>	<b>--</b>	<b>--</b>	<b>--</b>

**Table 39 - Business Activity**

**Data** 2009-2013 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)

**Source:**



## Labor Force

Labor Force	Number of People
Total Population in the Civilian Labor Force	16,085
Civilian Employed Population 16 years and over	14,480
Unemployment Rate	10.01
Unemployment Rate for Ages 16-24	29.31
Unemployment Rate for Ages 25-65	6.06

**Table 40 - Labor Force**

**Data** 2009-2013 ACS

**Source:**

Occupations by Sector	Number of People
Management, business and financial	2,075
Farming, fisheries and forestry occupations	325
Service	1,074
Sales and office	2,940
Construction, extraction, maintenance and repair	1,040
Production, transportation and material moving	2,430

**Table 41 – Occupations by Sector**

**Data** 2009-2013 ACS

**Source:**

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	11,960	85%
30-59 Minutes	1,880	13%
60 or More Minutes	180	1%
<b>Total</b>	<b>14,020</b>	<b>100%</b>

**Table 42 - Travel Time**

**Data** 2009-2013 ACS

**Source:**

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	4,690	450	1,650
High school graduate (includes equivalency)	2,145	235	750
Some college or Associate's degree	2,655	200	805
Bachelor's degree or higher	2,140	105	535

**Table 43 - Educational Attainment by Employment Status**

**Data** 2009-2013 ACS

**Source:**

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	245	790	1,100	1,935	575
9th to 12th grade, no diploma	510	1,030	955	985	345
High school graduate, GED, or alternative	1,060	990	710	1,430	1,165
Some college, no degree	1,120	970	1,005	925	715
Associate's degree	100	315	110	340	185
Bachelor's degree	195	325	415	860	645
Graduate or professional degree	0	245	370	570	255

**Table 44 - Educational Attainment by Age**

**Data** 2009-2013 ACS

**Source:**

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,121
High school graduate (includes equivalency)	21,838

Educational Attainment	Median Earnings in the Past 12 Months
Some college or Associate's degree	59,369
Bachelor's degree	76,219
Graduate or professional degree	119,908

**Table 45 – Median Earnings in the Past 12 Months**

**Data** 2009-2013 ACS

**Source:**

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

The largest employment sectors in the City of Dalton in terms of worker share are Manufacturing (40%); Retail Trade (11%); Arts, Entertainment, Accommodations Education (9%); and Education and Health Care Services (9%). The top five private employers in the City of Dalton include: Shaw Industries, Inc, Mohawk Industries, Engineered Floors, Tandus Centiva, and Durkan Hospitality/ Division of Mohawk.

**Describe the workforce and infrastructure needs of the business community:**

There are more than 230 manufacturing companies in Whitfield County. Nearly 40 percent of the area’s manufacturing companies make textiles - predominately carpets, rugs and other floor coverings. Healthcare Practitioners, Food Preparation/Serving and Sales workers are projected to account for the greatest occupational growth across the region over the next decade.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The national economic downturn and subsequent financial crisis disrupted commercial activities at all levels of the economy. As a result, the City established goals to identify and develop incentive strategies to create a more viable and competitive business environment to support its economic development over the next ten year.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

A skillful and well-educated workforce is essential to attracting and retaining employers and growing the City’s economy. Implementing a holistic approach to job readiness and skill development will be critical to the retention of existing businesses and the success of attracting those businesses with expanding labor needs.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

The City of Dalton is not a center for formal training and workforce development providers although, the City has access to a wide variety of potential workforce development partners.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

The City of Dalton participates in the Northwest Georgia Comprehensive Economic Development Strategy (CEDS), which is a strategy-driven plan for regional economic development. The Northwest Georgia Regional Commission (as the local Economic Development District) develops, implements, and revises the CEDS with assistance from the CEDS Strategy Committee.

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The City will continue to utilize federal funding to support programs that remove barriers to participation in the workforce (such as childcare, affordable healthcare, and public transportation) and enhance and expand community parks, trails, and recreation programs to retain talent and attract investment in the area.

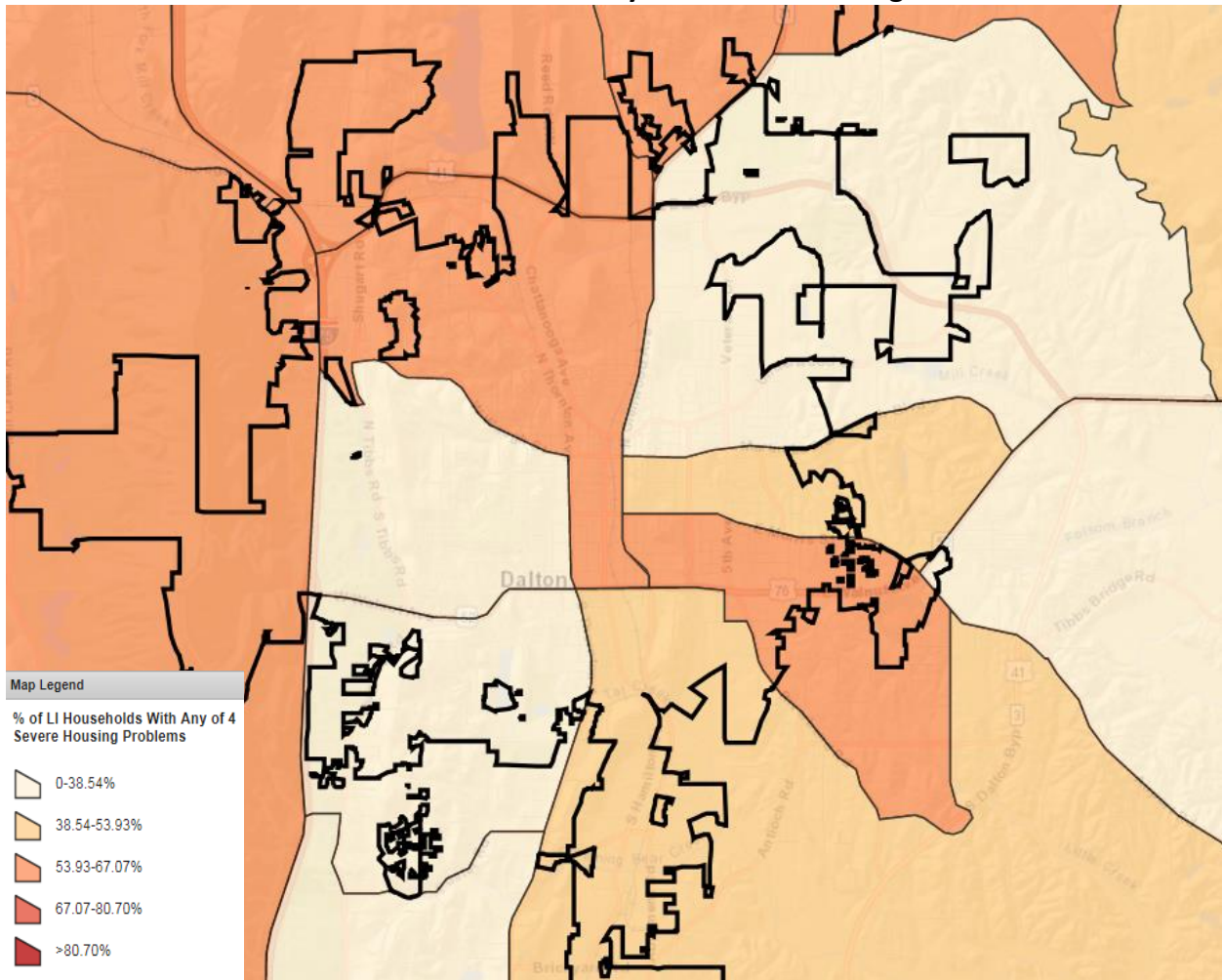


## MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

As shown in the attached map, the highest concentrations (greater than 53%) of low-income households with severe housing problems are in the central and southern part of the City.

**Percent of LI Households with Any of 4 Severe Housing Problems**

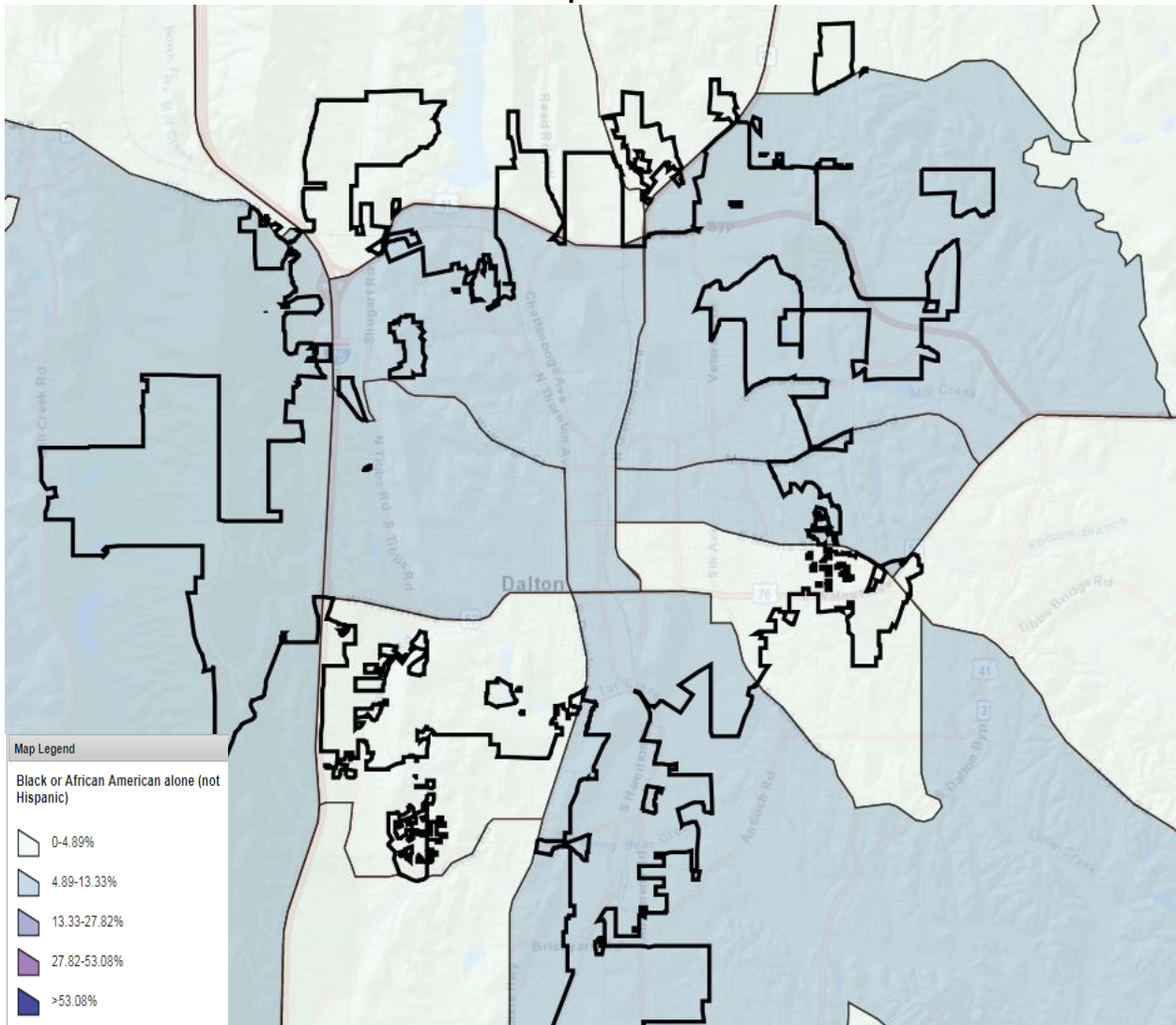


Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

An area of racial or ethnic concentration is defined as one in which the minority population share is 20% higher than the group's citywide average. There are no significantly high percentages of African American residents located within the City of Dalton.

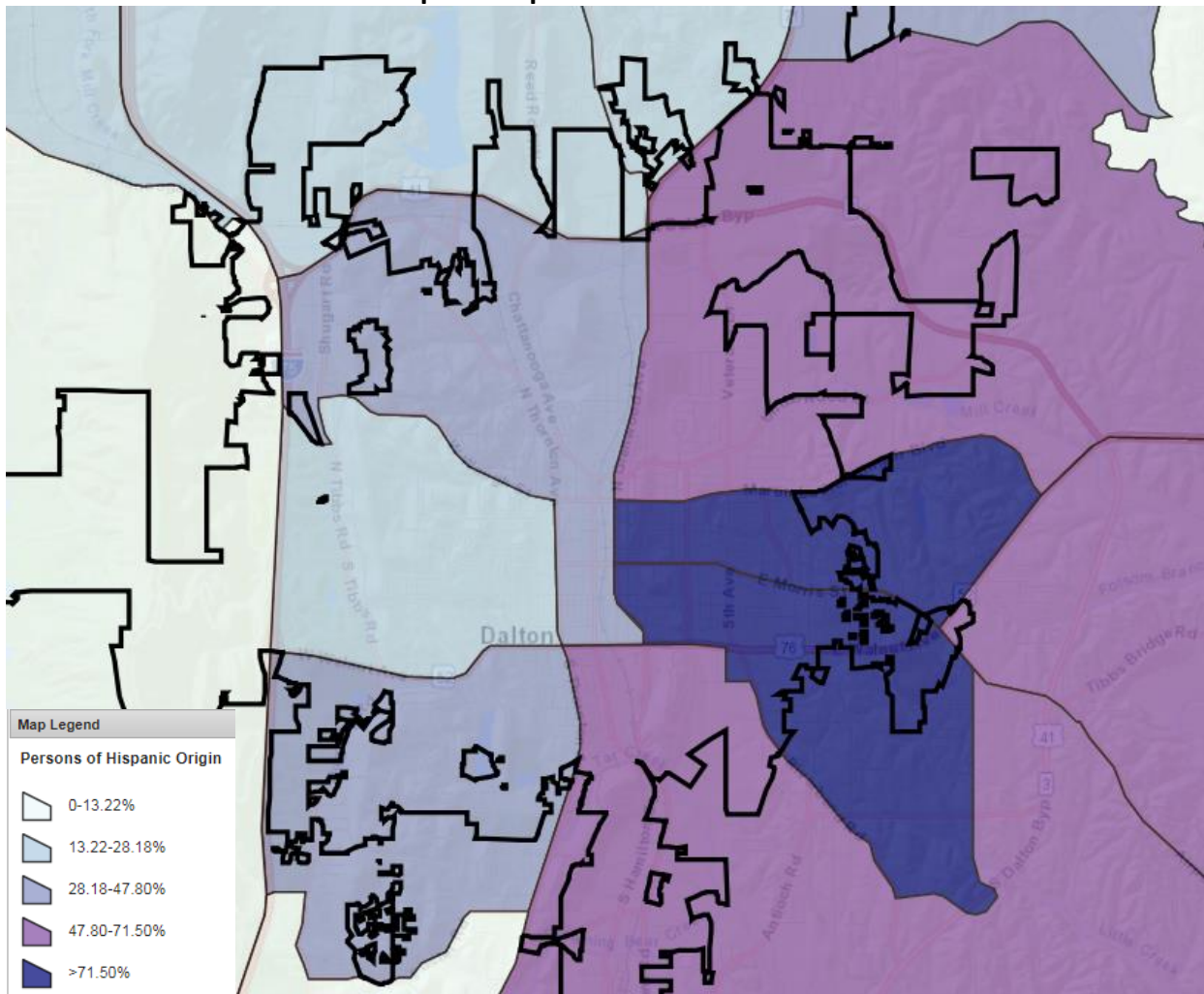
### African American Population Concentrations



Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

There are significantly higher percentages of Hispanic residents located in the following census tracts: 4.00 (64%); 10 (74.9%); 13 (72.6%); and 12 (51.7%) within the City of Dalton.

### Hispanic Population Concentrations

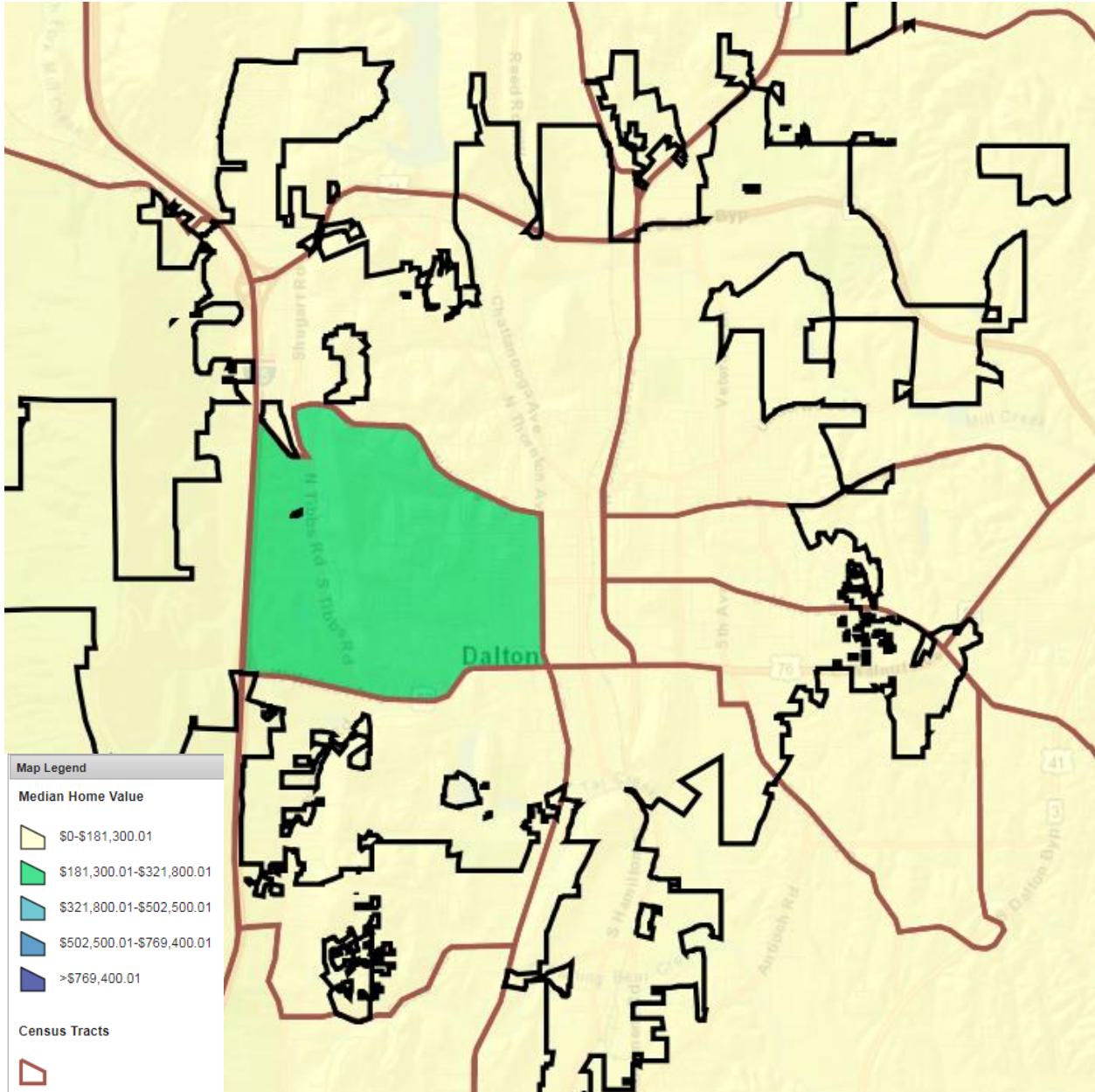


Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

### What are the characteristics of the market in these areas/neighborhoods?

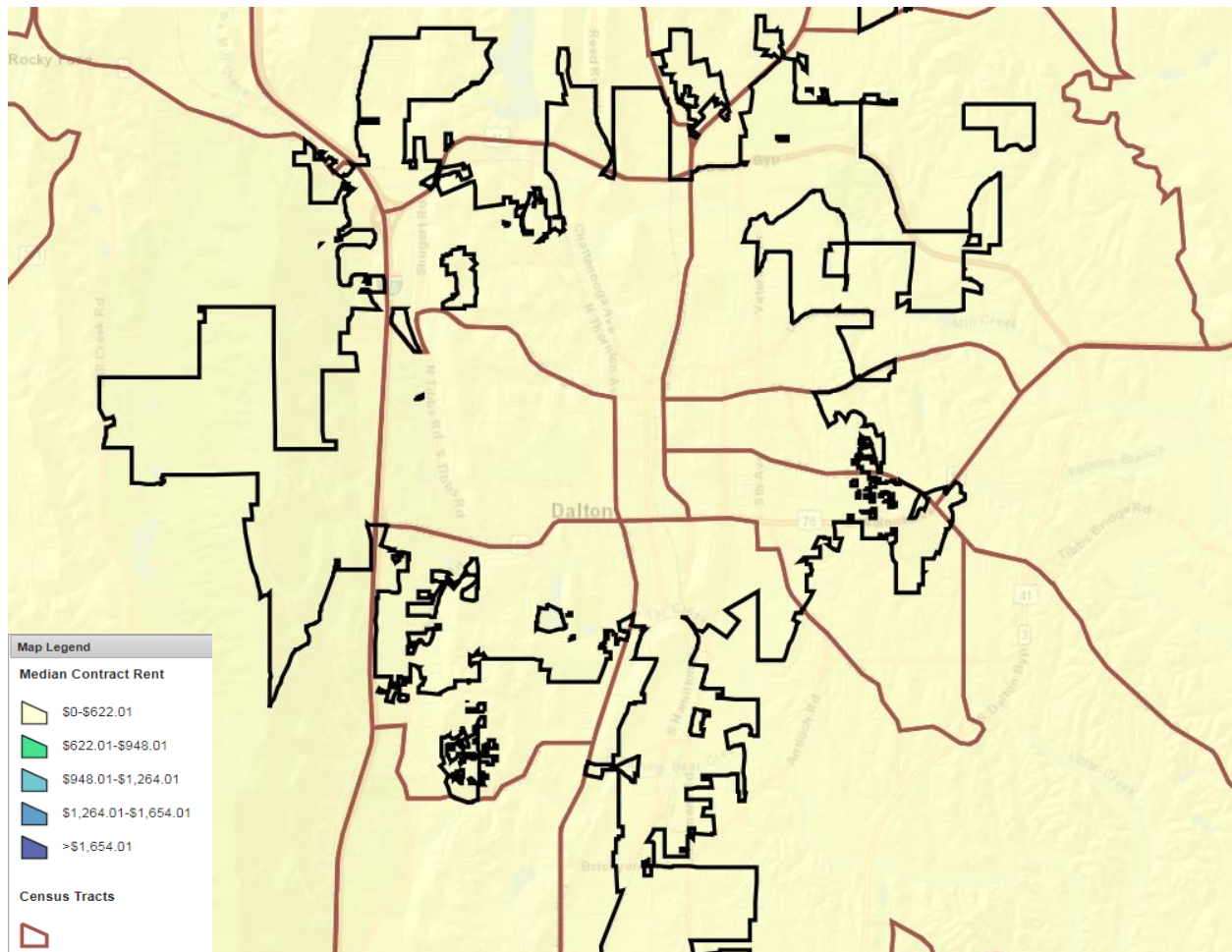
As shown in the following maps, median home values and contract rents in these tracts are lower than in other neighborhoods.

City of Dalton – Median Home Value by Census Tract



Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

### City of Dalton – Median Contract Rent by Census Tract

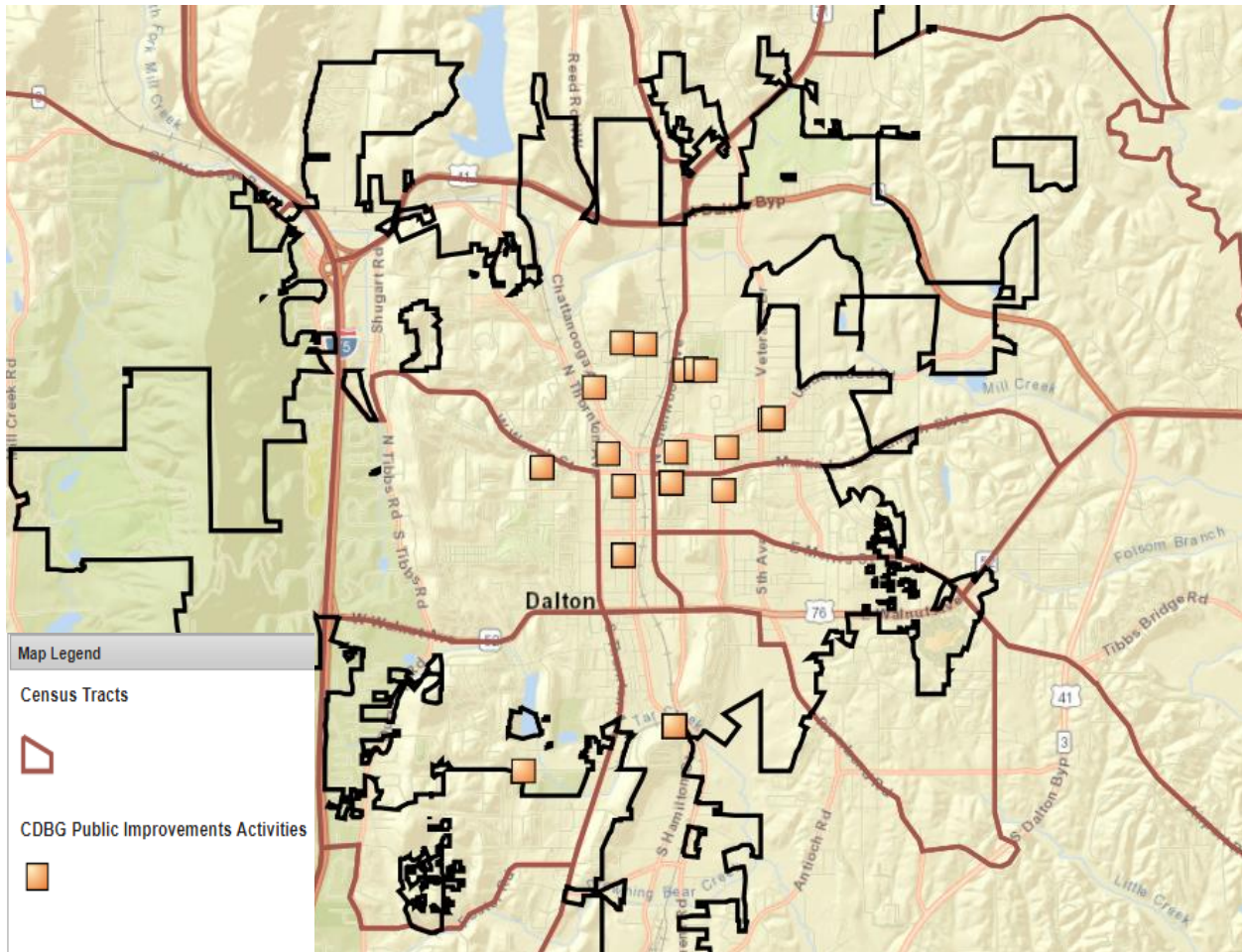


Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

#### **Are there any community assets in these areas/neighborhoods?**

Yes. These tracts are close areas in which the city has utilized CDBG funding to improve public facilities to include recreation facilities and social service facilities. However, these community assets are not equally distributed throughout these areas so that minority and/or low-income residents.

## City of Dalton – Community Assets



Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

### Are there other strategic opportunities in any of these areas?

In order for the City to remain competitive in the global economy, the City must continue to maintain, improve, and expand infrastructure necessary for economic growth. Essential infrastructure for economic development includes both above-ground and below-ground facilities, such as transportation, utilities, and broadband. Ready to develop properties are also vital for continued industrial growth.

## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

The Strategic Plan outlines the priority needs and geographic focus areas for community development and housing efforts in Dalton over the next five years. These priorities are based on findings from the needs assessment and market analysis, along with public input received through a variety of engagement methods. The City will continue to concentrate CDBG spending on housing initiatives, infrastructure improvements, and public service activities. Projects and programs funded using CDBG funds will meet program eligibility requirements, generate long term improvements for low- and moderate-income residents and communities, and help address federal, state, and local priorities, such as expanding fair housing choice and sustainability.

This Strategic Plan also outlines market conditions which may influence the use of HUD grant funds, the resources expected to be available to meet community needs, and the structure in place for delivering services. Strategies for addressing public housing, homelessness, lead-based paint hazards, and poverty are summarized. Finally, the Plan outlines barriers to housing affordability in Dalton and the City's plans to monitor performance and compliance for the CDBG program.

The Strategic Plan will guide the use of CDBG in the City of Dalton over the next five years and is guided by HUD's three overarching goals that are applied according to the City's needs. These goals are:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low and moderate income residents throughout the City, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low and moderate income persons to achieve self-sufficiency.

**SP-10 Geographic Priorities – 91.215 (a)(1)**

**Geographic Area**

Dalton is a mountain city located in Whitfield County, Georgia. It is the county seat of Whitfield County and the principal city of the Dalton, Georgia Metropolitan Statistical Area, which encompasses all of Murray and Whitfield counties. The City relies on widely accepted data such as American Community Survey (ACS), HUD low and moderate-income summary data, and Federal Financial Institutions Examinations Council (FFIEC) data to determine areas throughout the community with concentrations of low and moderate-income communities. Program resources are allocated City-wide based on low-mod areas which often coincide with areas of minority concentration.

Over the next five years, the City intends to use its resources to assist various projects throughout the City. Income eligible areas (i.e., areas where 51% or more of residents have low or moderate household incomes) are shown in the table below.

Target Area	Description
Target Area Name:	Citywide
Target Area Type:	Citywide

**Table 46 - Geographic Priority Areas**

**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The system for establishing the priority for the selection of these projects in the City of Dalton predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Focusing on LMI areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress.
- Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.



**SP-25 Priority Needs - 91.215(a)(2)**

**Priority Needs**

During the development of the Consolidated Plan, a number of priority needs were identified. Guidelines for addressing these priority needs over the 2019-2023 time frame are summarized below:

- **Planning & Administration**
- **Public Services**
  - Health and dental services
  - Services for the homeless and at-risk populations
  - Youth and childcare programs
  - Transportation for seniors and youth
- **Affordable Housing**
  - Housing Rehabilitation
- **Public Facility and Infrastructure Improvements**
  - Rehabilitation, acquisition, accessibility improvements of neighborhood facilities
  - Park Improvements
  - Sidewalk and Infrastructure Improvements
  - Support services for populations with special needs (e.g. elderly, persons with disabilities)

<b>1</b>	<b>Priority Need Name</b>	<b>PLANNING &amp; ADMINISTRATION</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Income Low Income Moderate Income
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Planning and administration
	<b>Description</b>	Planning and administration for CDBG program.
	<b>Basis for Relative Priority</b>	Effective and efficient implementation of CDBG funding requires adequate resources for program planning and administration.
	<b>Priority Need Name</b>	<b>PUBLIC SERVICES</b>
<b>2</b>	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Persons with Developmental Disabilities Individuals Non-housing Community Development Low Elderly Persons with Physical Disabilities Frail Elderly Persons with Mental Disabilities Families with Children Unaccompanied Youth Large Families Mentally Ill veterans Victims of Domestic Violence Persons with Alcohol or Other Addictions Elderly Moderate Victims of Domestic Violence Families with Children Chronic Homelessness Chronic Substance Abuse
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Provide public services.
	<b>Description</b>	Provision of public services
	<b>Basis for Relative Priority</b>	There continues to be a need for services to increase the effectiveness of physical investments that improve conditions for the elderly, youth, low-income persons, and other special populations.
	<b>Priority Need Name</b>	<b>HOUSING REHABILITATION</b>
<b>3</b>	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Income Low Income Moderate Income Large Families Families with Children Elderly Families Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol

		or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Improve access to and quality of housing.
	<b>Description</b>	Rehabilitation of occupied housing
	<b>Basis for Relative Priority</b>	Existing affordable housing that is lost from the inventory will increase competition for remaining units and decrease access to affordable housing overall.
4	<b>Priority Need Name</b>	<b>PUBLIC FACILITY AND INFRASTRUCTURE IMPROVEMENTS</b>
	<b>Priority Level</b>	Medium
	<b>Population</b>	Extremely Low Income Low Income Moderate Income Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Improve public facilities and infrastructure.
	<b>Description</b>	Expand public facility improvements and improve and maintain infrastructure servicing households in low income areas
	<b>Basis for Relative Priority</b>	Based on physical inspection and interviews conducted during consultation process, existing public facilities are in need of upgrading and expansion. Outdated and deteriorating infrastructure needs to be improved or replaced.

**Table 47 – Priority Needs Summary**

**SP-30 Influence of Market Conditions – 91.215 (b)**

**Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	As subsidized units, including LIHTC units expire, the need for TBRA will increase.
TBRA for Non-Homeless Special Needs	There is need for non-homeless special needs rental housing assistance throughout the city. The City’s housing market does not provide sufficient affordable, accessible rental housing to elderly and non-elderly persons with disabilities or supportive housing for persons with HIV/AIDS, persons with substance abuse, the elderly and persons with disabilities.
New Unit Production	The City’s housing inventory is dominated by one, two, and three-bedroom units. While these are suitable for most, larger families, individuals, young couples, and retired couples may have trouble finding housing that fits within their budget.
Rehabilitation	Several neighborhoods in the City have a high number of homes in need of major rehabilitation.
Acquisition, including preservation	There are opportunities to improve the conditions and affordability of housing by the acquisition of vacant, deteriorating structures due to declining affordability of low income rental or ownership housing.

**Table 48 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

The City uses multiple resources to carry out activities that benefit low and moderate-income persons. The City of Dalton receives an annual formula-based allocation from HUD. In Program Year (PY) 2019, the City of Dalton will receive \$410,181 in CDBG funding.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$410,181	\$0	\$0	\$410,181	\$2,050,905	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services

**Table 49 - Anticipated Resources**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.** The City will use a combination of public and private funding to carry out activities identified in this plan.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

**SP-40 Institutional Delivery Structure – 91.215(k)**

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Dalton	Government	Economic Development Neighborhood Improvements Public Facilities Public Services	Jurisdiction
Dalton-Whitfield Community Development Corporation	Non-profit Organization	Homelessness Non-homeless special needs Ownership Rental public services	Jurisdiction
The Dalton Housing Authority	Non-profit organizations	Low-Income Housing Rental Neighborhood improvements Public Facilities	Jurisdiction

**Table 50 - Institutional Delivery Structure**

**Assess of Strengths and Gaps in the Institutional Delivery System**

***Strengths***

The City of Dalton works closely and frequently with Community Housing Resources Corporation and the Dalton-Whitfield County Community Development Corporation and many of the Continuum of Care’s members to address service needs and enhance coordination among local service providers. In order to enhance coordination with local service providers, Dalton staff attends CoC meetings and public housing tenant council meetings. The City of Dalton also supports the Dalton Housing Authority in support of affordable housing opportunities.

***Gaps***

Some well-intentioned nonprofit organizations and community organizations lack the financial capacity to provide services in an efficient and effective manner. The funding that the City of Dalton receives from the federal government is intended to supplement the operation of programs. Agencies are not able to expand services because funding is simply not available.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X	X	
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services			
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	x	
<b>Other</b>			
Other			

**Table 51 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

While there are agencies in the area that provide homeless services and housing in Dalton, the City is limited on data that clearly documents homeless specific needs. The City continues to rely on the local nonprofits to supply the data they have available for homeless needs. The above chart was completed by the local United Way agency.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

A coordinated system between the City of Dalton and homeless service provider is essential to effectively serve the local community and end homelessness. Homeless systems and partners are often fragmented and uncoordinated leaving families to navigate different eligibility criteria and waitlists for shelter beds and housing programs. Often, various agencies are carrying out assessment and referral efforts on behalf of the same individuals adding additional strain to the system and duplicating efforts. A standardized and uniform assessment will lend itself to a more transparent system that targets the housing and other services. The main gap in this system is that this continuum of care is not associated with any resolute funding to tackle these issues.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City continues to work with service providers to identify gaps in services, any duplication of services, and attends regular meetings, that allow homeless service providers to more efficiently serve the homeless population. Additionally, providing a central intake and resource facility is an imperative part to the City's strategy to end homelessness.



**SP-45 Goals Summary – 91.215(a)(4)**

**Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rehabilitate Public Facilities	2019	2023	Non-Housing Community Development Needs	Countywide	Neighborhood Revitalization and Reinvestment	CDBG \$146,618	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted
2	Improve access to and quality of housing	2019	2023	Affordable housing	Citywide	Expand affordable housing opportunities	CDBG \$120,000	Single Family Rehab: Units
3	Planning and administration	2019	2023	Administration	Citywide	Planning & administration	CDBG \$82,036	Other: <u>1</u>
4	Provide public services	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services	CDBG \$61,527	Public Services for LMI Benefit: households

**Table 52 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name:</b> Rehabilitate Public Facility
	<b>Goal Description:</b> Rehabilitate existing public facilities to serve LMI households plus special needs and/or homeless individuals
2	<b>Goal Name:</b> Improve access to and quality of housing
	<b>Goal Description:</b> Support rehabilitation of housing for low income households
3	<b>Goal Name:</b> Planning and administration
	<b>Goal Description:</b> Administrative and planning costs to operate the CDBG program successfully
4	<b>Goal Name:</b> Provide public services
	<b>Goal Description:</b> Provision of public services

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The City of Dalton does not receive HOME grant funds.

**SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Not applicable

**Activities to Increase Resident Involvements**

Not applicable

**Is the public housing agency designated as troubled under 24 CFR part 902?**

Not applicable

**Plan to remove the ‘troubled’ designation**

Not applicable

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

The City's housing market presents significant impediments to development of an adequate supply of affordable housing for low to moderate-income people. Loss of major manufacturing employment opportunities coupled with rising construction costs has created a significant barrier to affordable housing. The City's Analysis of Impediments (AI) to Fair Housing Choice (2019) examined a number of areas in which barriers to the development of affordable housing might exist. Barriers identified in the AI and over the course of the outreach for the development of this Consolidated Plan, include:

- Unavailability of code standard affordable housing for rental and homeownership limits housing choice for low income households, seniors and disable adults
- Commercial Businesses/Industrial Companies may have potential adverse environmental effects on safe affordable housing for residents
- Fear of borrowing money from banks
- Lack of fair housing education
- Inability of non-English speaking or limited English speaking persons to housing related information in their primary languages
- Lack of public transportation
- Lack of emergency, transitional, and supportive housing for homeless men, women, and children.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The strategies listed below are based on public outreach conducted over the course of the development of this Consolidated Plan as well as recommendations from the 2019 AI:

#### **Impediment 1: Lack of affordable housing for Dalton residents.**

***Action: Increase the production and preservation of affordable housing units.***

#### **Recommendation**

The City should increase the supply of affordable housing for renters and homeowners by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding.

**Status:** The review of CHAS data and an analysis of housing affordability in the City of Dalton indicates that there is a shortage in the supply of affordable housing units for both owners and renters and that minorities are disproportionately impacted by housing cost burden as a result of economic pressures and other external conditions. In recent years, public funding, including CDBG funds have been declining and in order to increase the number of affordable housing units, the City shall work towards leveraging, as much as possible, with private sector funds and other

government funds to increase the variety and affordability of housing suitable for different types of households.

**Impediment 2: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP).**

***Action: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as Asian Americans, persons with disabilities***

**Status:** As part of the AI process, the City sought the input from several minority populations that are underrepresented groups. The City has also increased its outreach to minority populations especially persons of Hispanic/Latino ethnicity and the elderly. The City will also continue to increase education and awareness of the CDBG Program through partnerships with agencies that represent individuals and families with LEP.

## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City participates in and supports local efforts of the DWCDC and other local agencies in its initiatives and projects. Dalton will also continue to support organizations that assess the needs of the homeless to create a more robust social service system to address unmet needs. The DWCDC participates in the GA Balance of State Continuum of Care monthly meetings and coordinates services with CoC members. Over the next Consolidated Plan period, the City anticipates collaborating with various local nonprofits organizations to expand services for the homeless and at-risk of homelessness population.

The Georgia Balance of State Continuum of Care collaborates with non-profit organizations to analyze existing needs to assist in identifying funding gaps and other gaps in services. The Homeless Point in Time Count, organized by the DWCDC, annually assesses the characteristics of the homeless population in City. This data allows the Continuum and the City to track the changing needs of the homeless. The City will continue support the efforts of the Continuum of Care in the preparation of the Point in Time Count.

### **Addressing the emergency and transitional housing needs of homeless persons**

The City supports efforts of decreasing or ending homelessness in Dalton and supports the local Continuum of Care initiatives. Emergency needs for shelter are handled by the Georgia Balance of State Continuum of Care. The transitional housing needs of homeless persons are addressed below.

The City of Dalton does not receive its own ESG allocation and therefore relies on the allocation received by the agencies applying to the Georgia Balance of State Continuum of Care. These agencies are awarded funding for essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Dalton to include homeless families, single men and women, and survivors of domestic violence. The City supports increasing housing options and self-sufficiency for the homeless and near homeless by providing support for the following:

- Emergency housing and supportive services for homeless families and individuals;
- Developing transitional housing; and
- Preventing persons released from institutions from entering homelessness.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals**

**and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The Georgia Department of Community Affairs (DCA) administers the Emergency Solutions Grant Program and oversee activities for homeless individuals and families in Dalton. DCA has identified rapid re-housing as a priority during the next Consolidated Plan period. Obtaining permanent housing for homeless individuals and families will shorten the length of time spent in emergency and transitional shelters.

The City of Dalton encourages collaboration with organizations to transition as many people as possible into permanent housing. The City also supports the implementation of a referral and case management system with the tools to direct the homeless to appropriate housing and services. Some families or individuals may require only limited assistance for a short period of time, such as emergency food and shelter -- until a first paycheck is received or a medical emergency is past. Others, however, will require more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Due to limited resources, it is important for agencies to eliminate duplication of effort by local agencies, both in intake and assessment procedures, and in subsequent housing and supportive services. The Homeless Management Information System (HMIS) can be improved with common intake forms, shared data, effective assessment instruments and procedures, and on-going coordination of assistance among community organizations.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The Continuum of Care has outlined its discharge policy for assisting persons aging out of foster care, and being release from health care facilities, mental health facilities, and correction facilities.

DWDCDC receives an allocation from DCA to coordinate activities to prevent individuals and families from becoming homeless and to assist individuals/families regain stability in current housing or permanent housing. ESG program funds will be used for homelessness prevention which includes housing relocation and stabilization services and for short term (up to 3 months) or medium term (up to 24 months) rental assistance. A range of emergency shelter facilities and short-term services (food, clothing, and temporary financial assistance, transportation assistance) to meet a variety of family or individual circumstances is necessary to assist families in preventing homelessness. These facilities and services will be able to meet the needs of families with children, individuals, persons with special health problems, and other characteristics.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The Whitfield County Health Department educates the public on the hazards of lead-based paint and educates parents about protecting their children. In response to lead-based paint hazards and the limited resources available, the County and Dalton has planned a steady, long-term response in accordance with Federal lead-based paint standards, other applicable federal regulations, and local property standards in accordance with the State of Georgia requirements for Lead based Paint abatement.

Government assisted projects will include the completion of a lead-based paint inspection according to HUD and Environmental Protection Agency (EPA) guidelines. Policies and procedures for abatement of lead hazards have been established in Dalton.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

The building inspection department for the City of Dalton and Whitfield County implements regulations that are in compliance with the Residential Lead-Based Paint Hazard Reduction Act of 1992, known as Title X. Sections 1012 and 1013 of Title X amended the LBP Poisoning Prevention of 1971, the basic law covering LBP in Federally associated housing. Section 1018 of this law directed the Department of Housing and Urban Development (HUD) and the Environmental Protection Agency (EPA) to require the disclosure of known information on LBP and hazards before the sale or lease of most housing built before 1978. In most cases related to lead poisoning of children, it has been through exposure to dust or debris from LBP. The Whitfield County Health Department maintains a list of all LBP cases for the City.

### **How are the actions listed above integrated into housing policies and procedures?**

The City follows the policies and procedures of the local building inspection department.



## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Dalton will continue to increase its efforts to implement anti-poverty strategies over the next five years. The City will strive to increase its efforts in assisting homeowners and renters with housing rehabilitation and renovation of affordable housing to decrease the financial burden on low-to-moderate-income residents.

The City will continue to provide assistance to low and moderate income residents through the following initiatives:

- Provide assistance to nonprofit organizations;
- Continue to implement Section 3 policy as necessary.
- Continue to encourage nonprofit organizations to expand community development programs to incorporate job-training opportunities as a part of their operations.

Through the initiatives described above, and in cooperation with the agencies and nonprofit organizations noted, the City will continue to assist low and moderate-income residents of Dalton over the next five years.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The City will use CDBG funding to support public service activities and facilities that seek to reduce poverty through training, individual case management, and employment opportunities. The City will also partner with nonprofit agencies in support of affordable housing, work and employment opportunities. The City funds the maximum CDBG public service of 15% each funding year to assist with these activities.

### **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

To ensure that each recipient of CDBG funds operates in compliance with applicable federal laws and regulations, Dalton implements a monitoring strategy that closely reviews subrecipient activities and provides extensive technical assistance to prevent potential compliance issues.

Each program year, Dalton prepares a risk analysis matrix for monitoring all appropriate subrecipients. This risk analysis closely mirrors the Community Planning and Development [CPD] Notice 14-04, issued March 1 2014, which delineates the relevant factors to monitor in order to determine the risk level for grantees or its subrecipients. Once projects have been approved and subrecipients have been issued subrecipient agreements, staff members complete a risk analysis worksheet that reviews financial capacity; overall management; planning capacity and meeting HUD national objectives. Each subrecipient is graded and their score reflects one of three categories: low risk [0-30 points]; moderate risk [31-50 points]; and high risk [51-100 points]. The city determines its annual monitoring strategy based on the number of moderate to high risk subrecipients.

As a general rule, staff monitors (on-site) all moderate and high risk subrecipients on an annual basis, typically in the third or fourth quarter of each program year. Conversely, the low-risk subrecipients are monitored on-site every other program year during the same time frame, and desk reviews are conducted throughout the year. Staff closely monitors performance expectations of subrecipients [timeliness and productivity] in line with the new performance measurement system initiated by HUD.

## **Expected Resources**

### **AP-15 Expected Resources – 91.220(c)(1,2)**

#### **Introduction**

The City of Dalton receives a direct allocation of Community Development Block Grant funds. The City is responsible for administration of the CDBG program in compliance with the HUD regulations and requirements and has responsibility for the final allocation of funds for program activities. These funding sources are expected to be available over the next five years.

The PY2018 budget, not including program income, is an estimate of the funding received in PY2018, because the exact budget amount for these entitlement programs have not been approved by Congress. The anticipated amount for each program is CDBG (\$410,181). The City does not anticipate receiving any program income during the next Plan year.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$410,181	\$0	\$0	\$410,181	\$2,050,905	CDBG funding will address housing, community development and economic development needs in the City. Agencies will leverage CDBG funds with other public social service dollars and private donations.

**Table 53 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.**

The federal funding listed above is funding which is received annually to support activities outlined in this Plan. Although there are no guarantees of this funding, particularly in the current budget environment, the City has historically received these funds and expects to continue to receive CDBG funds for the period covered by this Plan. The City will continue to encourage leveraging of federal funds

to increase services to residents. The nonprofit organizations funded have the financial capacity through foundations and fundraising campaigns to leverage CDBG funds and expand their services to benefit more low and moderate-income persons.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.**

Not applicable

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG Planning and Administration	2019	2023	Non-Housing Community Development Needs	Citywide	Increase Housing Options for Homeless; Increase Capacity of Public Services	\$82,036.00	Not applicable
2	Provide Public Services	2019	2023	Non-Housing Community Development Needs	Citywide	Increase the Capacity of Public Services	\$61,527.00	Public Service Activities other than Low/Moderate Income Housing Income Benefit: 40 Persons Assisted

3	Improve access to and quality of Housing	2019	2023	Affordable Housing	Citywide	Increase Access to Affordable Housing	\$120,000.00	Owner-Occupied Single Family Units Rehabilitated: 10 Household Housing Unit
4	Rehabilitation of Affordable Rental Units	2019	2023	Affordable Housing	Citywide	Increase Access to Affordable Housing	\$146,618.00	Rental Units Rehabilitated: 15 Household Housing Unit

**Table 54 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name:</b> Rehabilitation of Affordable Rental Units
	<b>Goal Descriptions:</b> Rehabilitate existing affordable rental housing units for LMI households plus special needs and/or homeless individuals
2	<b>Goal Name:</b> Improve access to and quality of housing
	<b>Goal Description:</b> Support rehabilitation of owner occupied single family housing for low income households
3	<b>Goal Name:</b> Planning and administration
	<b>Goal Description:</b> Administrative and planning costs to operate the CDBG program successfully
4	<b>Goal Name:</b> Provide public services
	<b>Goal Description:</b> Provision of public services for projects that provide recreational activities, educational opportunities, and job skills to youth; supportive services to low and moderate income households and persons with special needs.



## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Projects planned for the upcoming year are identified in the table below. Additional details are provided in Section AP-38.

#### Projects

No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	CDBG Administration & Planning	CDBG Planning and Administration	Citywide - Other	CDBG Planning & Adm	CDBG : \$82,036
	Description	CDBG Program Administration & Planning			
	Target Date for Completion	7/1/2020			
	Estimate the number and type of families that will benefit from the proposed activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	1			
	Location Description (Note: Additional information for this discussion may be available on the Project Detail screen.)	Citywide			
	Planned Activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	<u>CDBG Program Administration &amp; Planning</u>			
2	Northwest GA Family Crisis Center	Provide Public Services	Citywide - Other	Public Services	CDBG : \$15,000
	Description	CDBG Public Services, operating costs for Community Latino Specialist for Domestic Violence			
	Target Date for Completion	7/1/2020			
	Estimate the number and type of families that will benefit from the proposed activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	20			
	Location Description (Note: Additional information for this discussion may be available on the Project Detail screen.)	Citywide			
	Planned Activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	CDBG Public Services, operating costs for Community Latino Specialist for Domestic Violence			
3	Friendship House	Provide Public Services	Citywide - Other	Public Services	CDBG : \$22,527
	Description	Organization will provide quality affordable childcare assistance for low income mothers to assist them in furthering their education. CDBG funding will be provided as childcare assistance for four 2-year old students.			
	Target Date for Completion	7/1/2020			
	Estimate the number and type of families that will benefit from the proposed activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	20			
	Location Description (Note: Additional information for this discussion may be available on the Project Detail screen.)	Citywide			
	Planned Activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	Organization will provide quality affordable childcare assistance for low income mothers to assist them in furthering their education. CDBG funding will be provided as childcare assistance for four 2-year old students.			

4	Latin America Association	Provide Public Services	Citywide - Other	Public Services	CDBG : \$24,000
	Description	CDBG Public Services, Operating costs for homeless/at risk homeless Latino households			
	Target Date for Completion	6/30/2020			
	Estimate the number and type of families that will benefit from the proposed activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	25			
	Location Description (Note: Additional information for this discussion may be available on the Project Detail screen.)	Citywide			
	Planned Activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	CDBG Public Services, Operating costs for homeless/at risk homeless Latino households			
5	Dalton Housing Authority	Improve access to and quality of Ho	Citywide - Other	Affordable Housing	CDBG : \$146,618
	Description	Public Facility renovations to replace HVAC at Red Clay			
	Target Date for Completion	7/1/2020			
	Estimate the number and type of families that will benefit from the proposed activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	15			
	Location Description (Note: Additional information for this discussion may be available on the Project Detail screen.)	405 Sequoyah Place, Dalton, GA 30721			
	Planned Activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	Public Facility renovations to replace HVAC at Red Clay			
6	City of Dalton Housing Rehabilitation Prog	Improve access to and quality of Ho	Citywide - Other	Affordable Housing	CDBG : \$120,000
	Description	City will operate a minor home repair grant program for low income households.			
	Target Date for Completion	7/1/2020			
	Estimate the number and type of families that will benefit from the proposed activities (Note: Additional information for this discussion may be available on the Project Detail screen.)	10			
	Location Description (Note: Additional information for this discussion may be available on the Project Detail screen.)	Citywide			
	Planned Activities (Note: Additional information for t+B49his discussion may be available on the Project Detail screen.)	City will operate a minor home repair grant program for low income households.			

**Describe the reasons for allocation priorities and any obstacles to addressing underserved**

**needs.**

Priority CDBG funding areas in Dalton include areas where the percentage of low to moderate income (LMI) persons is 51% or higher. The City defines “area of minority concentration” and “area of low-income concentration” as those census tracts that have concentrations of minority populations or low-income populations, respectively, statistically and significantly larger than the minority or low-income population for the City as a whole. For the purposes of this Annual Plan, “Minority concentration” is defined as those tracts with greater than 51% low and moderate income..

## AP-38 Project Summary

### Project Summary Information

#	Project Name
1	City of Dalton Administration & Planning
2	Northwest Georgia Family Crisis
3	Friendship House
4	Latin America Association
5	Dalton Housing Authority
6	City of Dalton Housing Rehabilitation

**AP-50 Geographic Distribution – 91.220(f)**

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Priority CDBG funding areas in Dalton include areas where the percentage of low to moderate income (LMI) persons is 51% or higher. The City defines “area of minority concentration” and “area of low-income concentration” as those census tracts that have concentrations of minority populations or low-income populations, respectively, statistically and significantly larger than the minority or low-income population for the City as a whole. For the purposes of this Annual Plan, “Minority concentration” is defined as those tracts with greater than 51% low and moderate income.

**Racially and Ethnically Concentrated Areas of Poverty**

In addition to accessing residential patterns of protected classes, this section uses a methodology developed by HUD to identify racially and/or ethnically concentrated areas of poverty (RCAP/ECAPs). HUD defines an RCAP/ECAP as a census tract with an individual poverty rate of 40% or greater (or an individual poverty rate at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more. According to the HUD GIS data and the 2009-2013 American Community Survey, the City of Dalton does not have any areas of concentrated poverty.

**Geographic Distribution**

Target Area	Percentage of Funds
Citywide	80%

**Table 55 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The City will use CDBG funds throughout the jurisdiction to serve low and moderate-income persons. A portion of CDBG funds will be used for the rehabilitation and renovation of single-family homes in low-income neighborhoods to improve the housing conditions within those neighborhoods. This method of allocation will enable the City to serve the most disadvantaged residents given the limited funding available.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

A portion of the City’s CDBG funds will be allocated to rehabilitate existing housing units. The special needs population will be served through local service providers. The homeless population will be served through the Continuum of Care. The goals below are estimates based on the 2019 program year.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	25
Special-Needs	0
<b>Total</b>	<b>25</b>

**Table 56 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	10
Acquisition of Existing Units	0
<b>Total</b>	<b>10</b>

**Table 57 - One Year Goals for Affordable Housing by Support Type**

**AP-60 Public Housing – 91.220(h)**

**Introduction**

The City does not own or manage any public housing. The Dalton Housing Authority is a separate legal entity that oversees public housing within the City’s jurisdiction.

**Actions planned during the next year to address the needs to public housing**

Not Applicable

**Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Not Applicable

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not Applicable

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City of Dalton's Annual Action Plan provides funding support for agencies providing services to the homeless. CDBG funds are also being provided for existing housing service providers to homeless populations.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

The City of Dalton will continue to work closely with agencies affiliated with the Georgia Balance of State CoC. Dalton and the CoC will prioritize families who have received a summons for eviction. In Georgia, the highest predictor of homelessness is a summons for eviction. We know that once a household lands in eviction court, the landlord will be granted relief and will place a lock on the door, retaining all possessions, usually immediately after court. Other risk factors include a history of instability and a dramatic change in income. In the next cycle of ESG funding, the Georgia Balance of State CoC will prioritize individuals and families seeking rapid rehousing and homelessness prevention in coordinated entry. Our hope is that prevention dollars can be used for households most in need and reduce the number of households who fall into homelessness.

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City participates in and supports the local COC and its initiatives and projects. Dalton will also continue to support organizations that assess the needs of the homeless to create a more robust social service system to address unmet needs. The city collaborates with various agencies that participate in the Continuum of Care regular meetings and coordinates services with CoC members. Over the next Consolidated Plan period, the City anticipates collaborating with various local nonprofits organizations to expand services for the homeless and at-risk of homelessness population.

The Georgia Balance of State Continuum of Care collaborates with non-profit organizations to analyze existing needs to assist in identifying funding gaps and other gaps in services. The Homeless Point in Time Count, organized by the Dalton Whitfield Community Development Corporation, annually assesses the characteristics of the homeless population in City. This data allows the City to track the changing needs of the homeless. The City will continue support the efforts in the preparation of the Point in Time Count.



## **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City supports efforts of decreasing or ending homelessness in the City of Dalton and supports the local Continuum of Care's initiatives. Emergency needs for shelter are handled by local agencies receiving funding through the Georgia Balance of State Continuum of Care. The transitional housing needs of homeless persons are addressed below.

The City of Dalton does not receive its own ESG allocation and therefore relies on the allocation received by the State. The Department of Community Affairs provides ESG funding for essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Dalton to include homeless families, single men and women, and survivors of domestic violence. The City supports increasing housing options and self-sufficiency for the homeless and near homeless by providing support for the following:

- Emergency housing and supportive services for homeless families and individuals;
- Developing transitional housing; and
- Preventing persons released from institutions from entering homelessness.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The Georgia Department of Community Affairs (DCA) administers the Emergency Solutions Grant Program and oversee activities for homeless individuals and families in Dalton. DCA has identified rapid re-housing as a priority during the next Consolidated Plan period. Obtaining permanent housing for homeless individuals and families will shorten the length of time spent in emergency and transitional shelters. According to the most recent Point in Time Count (PIT) of homeless persons in Dalton conducted on January 26, 2016, 320 persons in the City of Dalton were sleeping in either emergency or transitional shelters; and 207 persons were unsheltered.

The City of Dalton encourages collaboration with organizations to transition as many people as possible into permanent housing. The City also supports the implementation of a referral and case management system with the tools to direct the homeless to appropriate housing and services. Some families or individuals may require only limited assistance for a short period of time, such as emergency food and shelter -- until a first paycheck is received or a medical emergency is past. Others, however, will require more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Due to limited resources, it is important for agencies to eliminate duplication of effort by local agencies, both in intake and assessment procedures, and in subsequent housing and supportive services. The Homeless

Management Information System (HMIS) can be improved with common intake forms, shared data, effective assessment instruments and procedures, and on-going coordination of assistance among community organizations.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The Continuum of Care has outlined its discharge policy for assisting persons aging out of foster care, and being release from health care facilities, mental health facilities, and correction facilities.

DWCDC receives an allocation from DCA to coordinate activities to prevent individuals and families from becoming homeless and to assist individuals/families regain stability in current housing or permanent housing. ESG program funds will be used for homelessness prevention which includes housing relocation and stabilization services and for short term (up to 3 months) or medium term (up to 24 months) rental assistance. A range of emergency shelter facilities and short-term services (food, clothing, and temporary financial assistance, transportation assistance) to meet a variety of family or individual circumstances is necessary to assist families in preventing homelessness. These facilities and services will be able to meet the needs of families with children, individuals, persons with special health problems, and other characteristics.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City conducted its Analysis of Impediments to Fair Housing Choice (AI) in 2019 as part of that process the City and its stakeholders who participated in the process identified several contributing factors that create barriers to affordable housing and opportunities. A detailed description of these contributing factors can be found in the 2019 AI (accessed from the City of Dalton website) and highlights are listed below:

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

### **Discussion:**

**Goal 1:** Lack of Affordable Housing for Dalton Residents - Promote the development and rehabilitation of various types of housing that is affordable to lower income households.

**Strategies:** In order to address this goal, the following activities and strategies should be undertaken:

- Continue to support and encourage plans from both private developers and non-profit housing agencies to develop, construct, and/or rehabilitate affordable housing in the City.
- Survey the existing residential, mixed-use residential/commercial, and vacant structures to better utilize space for additional housing.
- Develop a housing rehabilitation program with low-interest loans/grants in lower-income neighborhoods where there is the highest percentage of vacant and deteriorated housing.

### **Goal 2:**

Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP).

**Strategies:** In order to address this goal, the following activities and strategies should be undertaken:

- Outline the procedures and process to report or file a fair housing complaint.
- Publicize the procedures and process in the local newspaper; post in public buildings, social service agencies' offices, and print out fliers to pass out.
- Develop opportunities to educate tenants, landlords, sellers, and mortgage brokers.
- Review and improve the rate of underwriting approval for minorities and persons of Hispanic origins in mortgage loan approvals as evidenced by the Home Mortgage Disclosure Act (HMDA) data.
- All essential documents, forms, and directions should be printed in English and Spanish, and a reference sheet in multiple languages should be attached to inform non-English speaking persons who to contact.



## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The Strategic Plan addresses the issue of meeting underserved needs through a variety of initiatives. Several of these initiatives are proposed for funding in this Annual Plan. As has been the situation in the past and most likely in the future the primary obstacle to these actions is a lack of funding.

### **Actions planned to address obstacles to meeting underserved needs**

To help remove obstacles to meeting underserved needs and improve service delivery, Dalton along with the Georgia Balance of State CoC will support the expansion of HMIS technology beyond homeless service providers to link the various categories of services provided by CoC members and standardize performance measures. Dalton will also review and analyze the work of its various departments and divisions to find opportunities for collaboration between similar programs.

### **Actions planned to foster and maintain affordable housing**

Affordable housing will be maintained and encouraged by the introduction of a minor home repair program to assist low income families with remaining in their homes. To promote affordable housing and fair housing choice, the City will encourage and support fair housing rights for all and provide program funds to conduct outreach and education regarding the Fair Housing Law act of 1968.

### **Actions planned to reduce lead-based paint hazards**

Dalton through the Georgia State Department of Health educates the public on the hazards of lead-based paint and educates parents about protecting their children. In response to lead-based paint hazards and the limited resources available, the City has planned a steady, long-term response in accordance with Federal lead-based paint standards, other applicable federal regulations, and local property standards. Government assisted housing rehabilitation projects will include the completion of a lead-based paint inspection according to HUD and Environmental Protection Agency (EPA) guidelines.

### **Actions planned to reduce the number of poverty-level families**

Current programs that are designed to assist households with incomes below poverty level are provided by several local nonprofits. The City will continue to direct residents to these agencies for antipoverty assistance programs. The City's highest poverty levels correspond with the

target areas for CDBG funding. In the past, the City funded some of the nonprofits for housing needs and will continue in the future.

The Antipoverty Strategy section of the Con Plan is to use CDBG funding to support public service activities and facilities that seek to reduce poverty through training, individual case management, and employment opportunities. The City will also partner with nonprofit agencies in support of affordable housing, work and employment opportunities.

### **Actions planned to develop institutional structure**

The Finance Department manages all aspects of the grant programs perform in a concerted manner. The department recognizes the need to maintain a high level of coordination on projects involving other City departments, County departments, and/or non-profit organizations. This collaboration guarantees an efficient use of resources with maximum output in the form of accomplishments.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City of Dalton will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its citizens. Dalton will seek opportunities to participate in collaborative groups to streamline the actions of public service agencies to improve the lives of all persons in the city. These groups address a broad range of needs for families including homelessness, public safety, workforce development, literacy, and allocation of other resources. The creation of such an entity will allow local non-profit organizations to focus their efforts collectively and to avoid duplication of services within the City.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income	\$0

#### Other CDBG Requirements

1. The amount of urgent need activities	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	80%

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

#### Appendix - Alternate/Local Data Sources

No alternate/local data was used in the development of this plan.