



**2024-2028**

**ANALYSIS OF IMPEDIMENTS TO  
FAIR HOUSING CHOICE**

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300 W. Waugh Street  
Dalton, GA 30720

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# I. EXECUTIVE SUMMARY

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## A. Background

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling or renting of housing because of a person's race, color, religion or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Texas Fair Housing Act, protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

This Analysis of Impediments to Fair Housing Choice (AI) documents a variety of fair housing issues faced by the residents of the City of Dalton, assesses their underlying causes, and identifies goals and actions to address those issues. It aims to harness data, community input, and policy analysis to craft solutions that will have a real impact for citizens.

The City of Dalton, as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) is required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that the City:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI);
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state and federal law. The federal Fair Housing Act defines impediments as:

*Any actions, omissions or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability which restrict housing choices or the availability of housing choice.*

The AI is a part of a multi-stage planning process: it provides a focused, comprehensive look into fair housing issues and generates fair housing goals to inform later planning processes, such as the Consolidated Plan (designating use of block grant funds), as well as other relevant activities. The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

While housing issues are complex and multi-faceted, and affect all residents of the region, the purpose of this AI is to focus specifically on fair housing and related needs and actions. The AI therefore examines whether housing issues are experienced differently on the basis of characteristics protected by the Fair Housing Act, which was crafted to address segregation and to prohibit discrimination on the basis of race, ethnicity, national origin, religion, sex, familial status, and disability. It also includes characteristics protected under state and local law, including any protections for sexual orientation and gender identity.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and possible actions to overcome the identified impediments.

The AI follows the Assessment of Fair Housing process and template, as developed by HUD in its 2015 regulation and Assessment Tool. As described below, its scope includes in-depth looks at a number of areas relevant to fair housing, including: trends and description of demographics; patterns of segregation and integration; identification of racially/ethnically concentrated areas of poverty (“R/ECAPs”); disproportionate housing needs (including cost burden and the adequacy and safety of housing); disparities in access to opportunity (education, employment, low poverty exposure, and environmental health); disabilities and access; publicly-supported housing; and fair housing enforcement, outreach, and capacity. In addition to data, maps, and policy analysis, it examines barriers to fair housing and their underlying causes (“contributing factors”). Most importantly, its data and analyses (including community input) provide the foundation for meaningful fair housing goals that address specific local issues.

## **B. Why Assess Fair Housing?**

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: the Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, including Community Development Block Grants (CDBG). As a part of the consolidated planning process (24 CFR 91), states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts and requires:

### **Conducting an Analysis of Impediments to Fair Housing Choice (AI);**

- Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintaining records reflecting the analysis and actions taken.

### **HUD interprets these three certifying elements to entail:**

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all people;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published providing program participants with an approach to more effectively and efficiently incorporate into the planning process the duty of affirmatively furthering the

policies of the Fair Housing Act. The purpose of this rule was to refine the prior analysis of impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On Friday, January 5, 2018, HUD published Federal Notice Document 2018-00106, titled: *Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants*. This notice advises that HUD is extending the deadline for submission of an Assessment of Fair Housing (AFH) by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Per the guidance, the City of Dalton will continue to meet the obligation of affirmatively furthering fair housing by conducting an Analysis of Impediments to Fair Housing Choice.

On February 9, 2023, HUD published in the Federal Register a Notice of Proposed Rulemaking entitled "Affirmatively Furthering Fair Housing". The proposed rule, which builds on and refines HUD's 2015 rule, would faithfully implement the Fair Housing Act's statutory mandate that HUD ensure that recipients of its funding affirmatively further fair housing (AFFH). The AFFH mandate requires the agency and its program participants to proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

### **C. Research Methodology/Community Participation Process**

The 2024 City of Dalton Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout Dalton. This information was collected and evaluated through four general approaches:

- **Primary Research** – the collection and analysis of raw data that did not previously exist.
- **Secondary Research** – the review of existing data and studies.
- **Quantitative Analysis** – the evaluation of objective, measurable and numerical data.

- **Qualitative Analysis** – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the city’s housing marketplace were drawn from the 2020 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the 2024 Dalton AI.

### ***Community Engagement***

- **Stakeholder Surveys in conjunction with this Analysis**- a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

The Fair Housing Survey was designed to collect input from a broad spectrum of the community and received responses from City of Dalton residents and non-residents. The survey consisted of 28 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 31 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the total survey respondents.

Surveys were received over from January 10, 2024 to February 15, 2024. Paper surveys received were manually entered by the Survey Administrator into Survey Monkey for tabulation and analysis. To prevent “ballot stuffing”, the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

- **Stakeholder Interviews** – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), municipal officials, City of Dalton staff, fair housing advocates, members of City Council, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.



- **Public Meeting** – A public meeting was held to provide a forum for City of Dalton residents and other interested parties to contribute to this Analysis held on Thursday, February 1, 2024 at 9:00am and 11:00am at the Mack Gaston Community Center for residents to attend. This meeting was advertised via flyers distributed by the City of Dalton using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

## **D. Current 2024 Impediments and Recommendations**

### **Impediment 1: Housing Affordability/Cost Burden**

High rents in relationship to the earnings of average workers put housing affordability out of the reach for many. Housing is the largest monthly cost for most households. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

Citywide, 13% of households spend over 50% of their income on housing costs. White households and Hispanic households face severe cost burdening at the same rate, 12%. Black households disproportionately face a high rate of severe cost burdening than the jurisdiction as a whole at 23%, spending more than 50% of their income on housing costs.

### **Recommendations:**

- Leverage Tenant Based Rental Assistance as an interim solution for housing affordability.
- Explore re-purposing of existing real estate to include strip malls and extended stay hotels into rental units, including single room occupancy (SRO) options.
- Provide tax incentives for apartment owners or owners of secondary residential properties who are willing to set aside a certain number of their existing apartments / homes as affordable housing.
- Encourage more private sector investment in existing affordable housing properties to supplement federally funded efforts.
- Develop Economic Development activities that will provide opportunities for small businesses to grow their customer base in their pursuit of sustainability.

## **Impediment 2: Inadequate Fair Housing Education and Awareness in Community especially for LEP populations**

As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

### **Recommendations:**

- 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.
- Expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.
- Fund and promote Fair Housing Education and Housing Counseling activities with CDBG Public Service funds.
- Develop a Fair Housing Education Campaign to increase public awareness of fair housing rights.
- Seek public and private partners to disseminate fair housing information to residents.

### **E. Glossary of Terms**

Throughout this document you will find specialized terms used to describe some of the research and findings. This glossary of terms has been prepared to familiarize the reader with some of the words and the way they are being defined and used in this Analysis of Impediments to Fair Housing Choice.

**Accessibility:** whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers.

**Affirmatively Further Fair Housing (AFFH):** a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated.

**American Community Survey (ACS):** a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are

conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

**Americans With Disabilities Act (ADA):** federal civil rights law that prohibits discrimination against people with disabilities.

**Annual Action Plan:** an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan.

**CDBG:** Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement.

**Census Tract:** small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

**Consolidated Plan (Con Plan):** a plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Action Plan, CDBG, HOME, ESG, HOPWA.

**Continuum of Care (CoC):** a HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

**Data and Mapping Tool (AFFHT):** an online HUD resource combining data from various sources including HUD, the decennial Census data and the American Community Survey to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, Limited English Proficiency, housing problems, environmental health, and school proficiency, etc.

**Disparate Impact:** practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

**Dissimilarity Index:** measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the

higher the level of segregation. For example, if a city's Black/White Dissimilarity Index was 65, then 65 percent of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

**Entitlement Jurisdiction:** a local government that receives funds from HUD to be spent on housing and community development.

**ESG:** Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless.

**Environmental Health Index:** a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

**Environmental Justice:** the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience negative health effects. Recognizing this history and working to make changes in future environmental planning are important pieces of environmental justice.

**Exclusionary Zoning:** the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

**Exposure Index:** a measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

**Fair Housing Act:** a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

**Gentrification:** the process of renovating or improving a house or neighborhood to make it more attractive to middle-class residents. Gentrification often causes the cost of living in the neighborhood to rise, pushing out lower-income residents and attracting middle-class residents. Often, these effects which are driven by housing costs have a corresponding change in the racial demographics of an area.

**HOME:** HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and/or rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

**HOPWA:** Housing Opportunities for Persons With AIDS. HUD makes grants under the HOPWA program to local communities, states, and nonprofits for projects that benefit low-income people living with HIV/AIDS and their families

**Housing Choice Voucher (HCV):** a HUD rental subsidy issued to a low-income household that promises to pay a certain amount of the household's rent. Prices, or payment standards, are set based on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Participants of the HCV program are free to choose any rental housing that meets program requirements

**Housing Discrimination:** the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lendee based on that person's race, class, sex, religion, national origin, or familial status.

**Isolation Index:** a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent isolation index value for White people would mean that the population of people the typical White person is exposed to is 80 percent White.

**Inclusionary Zoning:** a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

**Jobs Availability Index:** number of jobs per 1000 people within a five mile radius of the census tract center-point. Index is computed by the UC Davis Center for Regional Change.

**Jobs Proximity Index:** a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

**Labor Market Engagement Index:** a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

**Limited English Proficiency (LEP):** residents who do not speak English as a first language, and who speak English less than "very well."

**Local Data:** any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey.

**Low Income Housing Tax Credit (LIHTC):** provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

**Low Poverty Index:** a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

**Low Transportation Cost Index:** a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

**Market Rate Housing:** housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

**NIMBY: Not In My Back Yard.** A social and political movement that opposes housing or commercial development in local communities NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly veiled racism.

**Poverty Line:** the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The 2024 US poverty line for a family of three is \$25,820.

**Project-Based Section 8, Project-Based Rental Assistance, PBRA:** a government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

**Public Housing:** housing that is owned and managed by a Public Housing Authority for eligible low-income households.

**Publicly Supported Housing:** housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

**Other Multi-Family Housing:** multifamily housing that is owned and operated by private owners, and is subsidized through programs other than HCV, PBRA, or LIHTC. Units include properties funded through Supportive Housing for the Elderly (Section 202), and Supportive Housing for Persons with Disabilities (Section 811).

**Reasonable Accommodation:** a change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

**R/ECAPs:** Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50 percent Non-White residents, and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink.

**Rehabilitation Act (Section 504):** a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

**School Proficiency Index:** a HUD calculation based on performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

**Segregation:** the separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means.

## II. COMMUNITY CHARACTERISTICS

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Demographic information in this section primarily relies on data published by the United States Census Bureau. Specifically, the 2020 Decennial Census and American Community Survey (ACS) 2018-2022 5-Year Estimates are used throughout. Supplemental information is also provided through the United States Department of Housing and Urban Development (HUD) Office of Policy Development and Research (PD&R).

The demographic summary provides a current snapshot of the City's residents, housing, employment, education, and land use. This section also includes recent trends regarding these topics. Demographic data and other background information helped form the foundation for this Analysis of Impediments (AI) and AI's of the future.

### A. Demographic Profile

The primary source of demographic data used in this study comes from the U.S. Census Bureau. The American Community Surveys (ACS) provides the most recent demographic data as well as important information use to show the trends in population and household changes over the years. Demographic data was analyzed and obtained from the 2020 U.S. Census 2022 American Community Survey (ACS).

#### **Population**

According to ACS estimates, Dalton, Georgia has experienced an 2.69% increase in population with the population increasing from 33,458 in 2018 to 34,358 in 2022.

#### **Age and Sex Over the Years**

According to the 2022 American Community Survey 5 Year Estimates, the median age of Dalton Residents is 34 years old. The largest concentration of residents is in the 25-44 age range making up 26.51% of this population.

Overall, the largest demographic is 18-64 years old at 29,938. In terms of sex, females have slightly outnumbered males within the last five years; however, historically males have always outnumbered females in the city. Women edged out men 50.24% to 49.76% as of the 2022 census; a slight change from 2018 numbers that reflected 50.08 % to 49.92% for men to women. The senior citizen population of 65 and over has experienced a 12.76% increase. With this observation, the city will need to take into consideration the growing number of the elderly when developing community housing plans.



AGE & SEX POPULATION CHARACTERISTICS						
Age	2018			2022		
	Both Sexes	Male	Female	Both Sexes	Male	Female
		33,458	16,757	16,701	34,358	17,096
<b>Under 18 years</b>	9,279	4,608	4,671	8,889	4,438	4,451
<b>18 to 24 years</b>	3,548	1,941	1,607	3,911	2,035	1,876
<b>25 to 44 years</b>	9,761	5,205	4,556	9,108	4,877	4,231
<b>45 to 64 years</b>	6,950	3,406	3,544	8,030	3,806	4,224
<b>65 years and over</b>	3,920	1,597	2,323	4,420	1,940	2,480
<b>Median Age [years]</b>	<b>31.9</b>	<b>31.2</b>	<b>33.3</b>	<b>34</b>	<b>32.1</b>	<b>34.8</b>

Table 1: Age & Sex Population Characteristics Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Households

According to the 2022 ACS 5 Year Estimates Survey, there are currently 11,960 households in Dalton, Georgia. Currently the household size for an overall household size is 2.76 and the family size is 3.42 this number differs slightly from the family size for a married couple which is 3.57. The data also shows most households are owner-occupied married-couple family households. The majority of renter-occupied households are female lead, no spouse present family.

MARITAL STATUS			
2018		2022	
Never married	32.20%	Never married	37.70%
Now married, except separated	46.80%	Now married, except separated	41.20%
Divorced or separated	14.30%	Divorced or separated	13.80%
Widowed	6.70%	Widowed	7.40%
<b>Average household size</b>	<b>2.81</b>	<b>Average household size</b>	<b>2.76</b>
<b>Average family size</b>	<b>3.55</b>	<b>Average family size</b>	<b>3.42</b>

Table 2: Household Type Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

HOUSEHOLD AND FAMILIES					
	Total	Married-couple family household	Male householder, no wife present, family household	Female householder, no husband present, family household	Nonfamily household
Total Households	11,960	4,586	1,231	2,299	3,844
Average Household Size	2.76	3.58	3.04	3.64	1.17
FAMILIES					
Total Families	8,116	4,586	1,231	2,299	(X)
Average Family Size	3.42	3.57	2.71	3.52	(X)
HOUSING TENURE					
Owner-Occupied Housing	53.40%	76.70%	46.40%	34.20%	39.20%
Renter-Occupied Housing	46.60%	23.30%	53.60%	65.80%	60.80%

Table 3: Household and Families Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Race and Ethnicity

Dalton's racial makeup consisted of 77.02% White; 12.46% Black or African American; 0.28% American Indian and/or Alaskan Native; 5.08% Asian; 0.04% Pacific Islander; 0.63% from some other races; and 4.49% from two or more races; 50.85% were Hispanic or Latino of any race.

RACE AND ETHNICITY		
	Number	Percentage
<b>TOTAL POPULATION</b>	<b>34,417</b>	<b>100%</b>
White	13,029	77.02%
Black or African American	2,108	12.46%
American Indian and Alaska Native	48	0.28%
Asian	859	5.08%
Native Hawaiian and Other Pacific Islander	7	0.04%
Some other race	107	0.63%
Two or more races	759	4.49%
HISPANIC OR LATINO		
Hispanic or Latino	17,500	50.85%
Not Hispanic or Latino	16,917	49.15%

Table 4: Race and Ethnicity Source: U.S. Census Bureau 2020 Decennial, [www.census.gov](http://www.census.gov)

## Origin and Ancestry

According to U.S. Census Bureau, 2022 5-yr American Community Survey Estimates, there were approximately 39,333 Foreign born individuals in Dalton, Georgia. Most of the foreign-born population originated from Latin American at 51.20%, while another notable portion comes from Asia at 36.50%.

	Foreign-born; Entered 2010 or later	Foreign- born; Entered 2000 to 2009	Foreign-born; Entered before 2000	Total
Naturalized citizen	9.30%	45.40%	51.30%	<b>40.70%</b>
Not a citizen	90.70%	54.60%	48.70%	<b>59.30%</b>
Total Foreign-Born Population	1,926	2,370	4,694	<b>8,990</b>

Table 5: Foreign-Born Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

WORLD REGION OF BIRTH OF FOREIGN BORN	
<b>Foreign-born population excluding population born at sea</b>	<b>8,990</b>
Europe	0.80%
Asia	7.00%
Africa	1.30%
Oceania	0.10%
Latin America	90.20%
Northern America	0.60%

Table 6: World Region of Birth Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The following table presents the ancestry of Dalton residents in 2022. The most common ancestries identified were English (12.70%), Irish (5.80%), and American (4.50%).

ANCESTRY		
Total population	<b>34,358</b>	<b>100%</b>
American	1,540	4.50%
Arab	0	0.00%
Czech	9	0.00%
Danish	25	0.10%
Dutch	157	0.50%
English	4,377	12.70%
French (except Basque)	217	0.60%
French Canadian	0	0.00%
German	1,321	3.80%
Greek	10	0.00%

Hungarian	17	0.00%
Irish	1,994	5.80%
Italian	518	1.50%
Lithuanian	0	0.00%
Norwegian	8	0.00%
Polish	108	0.30%
Portuguese	16	0.00%
Russian	0	0.00%
Scotch-Irish	188	0.50%
Scottish	543	1.60%
Slovak	0	0.00%
Subsaharan African	595	1.70%
Swedish	423	1.20%
Swiss	16	0.00%
Ukrainian	0	0.00%
Welsh	70	0.20%
West Indian (excluding Hispanic origin groups)	7	0.00%

Table 7: Ancestry Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Limited English Proficiency

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is discrimination based on a person’s inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

The LEP population of Dalton is consistent with the national origin data. Spanish is, by far, the most spoken language among LEP individuals in Dalton, Georgia. Although English is predominantly spoken, roughly 42% of the population speak other languages, which suggests a need for accommodations of those non-English speaking residents. The two largest non-English speaking populations in the city are Spanish and Asian and Pacific Islander languages.

LANGUAGE SPOKEN AT HOME		
<b>Population 5 years and over</b>	<b>31,935</b>	<b>100%</b>
<b>English only</b>	17,832	55.80%
<b>Spanish</b>	13,360	41.80%
<b>Other Indo-European languages</b>	260	0.80%
<b>Asian and Pacific Islander languages</b>	456	1.40%
<b>Other languages</b>	27	0.20%

Table 8: Language Spoken at Home Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## B. Income Profile

The income and poverty profile presents an overview of household income, data elements that include household size, low-income population, and percentage of median family households in poverty. As noted in the table below, the median household income for Dalton increased from \$42,062 in 2018 to \$57,163 in 2022, while the mean family income also increased from \$63,450 in 2018 to \$82,459 in 2022.

HOUSEHOLD INCOME				
	2018		2022	
	Total Number of Households	Percentage	Total Number of Households	Percentage
<b>Total Households</b>	<b>11,461</b>	<b>100%</b>	<b>11,960</b>	<b>100%</b>
<b>Less than \$10,000</b>	825	7.20%	526	4.40%
<b>\$10,000 to \$14,999</b>	940	8.20%	514	4.30%
<b>\$15,000 to \$24,999</b>	1,490	13.00%	1,256	10.50%
<b>\$25,000 to \$34,999</b>	1,341	11.70%	1,208	10.10%
<b>\$35,000 to \$49,999</b>	1,971	17.20%	1,363	11.40%
<b>\$50,000 to \$74,999</b>	2,361	20.60%	2,404	20.10%
<b>\$75,000 to \$99,999</b>	1,043	9.10%	1,645	13.75%
<b>\$100,000 to \$149,999</b>	722	6.30%	1,914	16.00%
<b>\$150,000 to \$199,999</b>	241	2.10%	449	3.75%
<b>\$200,000 or more</b>	527	4.60%	682	5.70%
<b>Median Household Income</b>	<b>\$42,062.00</b>		<b>\$57,163.00</b>	
<b>Mean Family Income</b>	<b>\$63,450.00</b>		<b>\$82,459.00</b>	

Table 9: Household Income Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing. Since FY 2011, HUD has based its median family income estimates on data from the Census Bureau's American Community Survey (ACS). Since FY 2012, there has been a 3-year lag between the ACS estimates and the fiscal year for which the income limits are in effect. For example, the FY 2022 median family incomes and income limits were based on the ACS 2019 data. The FY 2023 median family incomes and income limits would ordinarily be based on the ACS 2020 estimates. However, because of the lack of 1-year ACS 2020 estimates described above, HUD intends to instead base the FY 2023 median family incomes and income limits on ACS 2021 data.

The CDBG Program provides annual grants on a formula basis to Entitlement Communities to support viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low-and moderate-income persons. For a project or program to qualify for CDBG funds, 51% of the program beneficiaries must be low- to moderate-income as defined by HUD.

The following table reflects the current HUD income limits for one to eight-person households who earn at or below 80% of the Area Median Income (AMI) for Dalton, GA.

2023 CDBG MAXIMUM INCOME LIMITS			
Household Size	Extremely Low-Income Limits	Very Low (50%) Income Limits	Low (80%) Income Limits
1	\$14,580.00	\$23,800.00	\$38,050.00
2	\$19,720.00	\$27,200.00	\$43,500.00
3	\$24,860.00	\$30,600.00	\$48,950.00
4	\$30,000.00	\$34,000.00	\$54,350.00
5	\$35,140.00	\$36,750.00	\$58,700.00
6	\$39,450.00	\$39,450.00	\$63,050.00
7	\$42,200.00	\$42,200.00	\$67,400.00
8	\$44,900.00	\$44,900.00	\$71,750.00

Table 10: FY 23 Income Limits Summary:

[https://www.huduser.gov/portal/datasets/il/il2023/2023summary.odn?inputname=METRO19140M19140\\*Dalton%2C+GA+HUD+Metro+FMR+Area&wherefrom=%24wherefrom%24&selection\\_type=hmfa&year=2023](https://www.huduser.gov/portal/datasets/il/il2023/2023summary.odn?inputname=METRO19140M19140*Dalton%2C+GA+HUD+Metro+FMR+Area&wherefrom=%24wherefrom%24&selection_type=hmfa&year=2023)

### Percentage of Poverty in Dalton, GA

According to U.S. Census and ACS data; Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 30.40% in 2022. The most common poverty characteristics in Dalton, GA is families with related children under 18 years of age.

POVERTY CHARACTERISTICS						
	All Families		Married-couple families		Female householder, no spouse present	
	Total	% Below Poverty Level	Total	% Below Poverty Level	Total	% Below Poverty Level
<b>Families</b>	<b>8,116</b>	<b>13.30%</b>	<b>4,586</b>	<b>7.60%</b>	<b>2,299</b>	<b>30.40%</b>

With related children of householder under 18 years	4,226	22.90%	2,331	12.40%	1,283	50.90%
With related children of householder under 5 years	735	19.60%	410	21.00%	107	54.20%
With related children of householder under 5 years and 5 to 17 years	824	35.20%	599	22.70%	208	74.00%
With related children of householder 5 to 17 years	2,667	20.00%	1,304	5.00%	968	46.90%

Table 11: Family Poverty Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### C. Employment Profile

Data regarding the labor force, defined as the total number of persons working or looking for work and employment is gathered from the decennial census and American Community Survey estimates are presented below. The labor force participation decreased from 64.20 percent in 2018 to 63.60 percent in 2022. The employed population increased by 1.3 percent during that time. The unemployment rate decreased from 7 percent in 2018 to 3.90 percent in 2022.

EMPLOYMENT				
	2018		2022	
<b>Population 16 years and over</b>	<b>25,448</b>	<b>100%</b>	<b>26,583</b>	<b>100%</b>
<b>In labor force</b>	16,327	64.20%	16,894	63.60%
<b>Not in labor force</b>	9,121	35.80%	9,689	36.40%
<b>Population 16 years and over</b>	<b>25,448</b>	<b>100%</b>	<b>26,583</b>	<b>100%</b>
<b>Civilian labor force</b>	<b>16,327</b>	<b>66.70%</b>	<b>16,888</b>	<b>65.50%</b>
<i>Employed</i>	15,182	59.70%	16,222	61.00%
<i>Unemployed</i>	1,145	4.50%	666	2.50%
<b>Armed Forces</b>	<b>0</b>	<b>0.00%</b>	<b>6</b>	<b>0.00%</b>
<b>Unemployment Rate</b>	<b>(X)</b>	<b>7.00%</b>	<b>(X)</b>	<b>3.90%</b>

Table 12: Employment Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Jobs Held by Residents

In 2022, 63.60% of Dalton’s residents 16 years of age and over were part of the labor force; according to the 2022 5-yr American Community Survey Estimates. The largest portion of Dalton workers are in production, transportation, and material moving occupations with management, business, science, and arts occupation coming in second. Service and sales/office occupations combined account for about thirty-three percent of the workforce.

The following charts illustrate the categories of workers and their occupations.

OCCUPATIONAL CHARACTERISTICS		
Occupations of Dalton Residents	Estimated Number of Residents	% Employed by Occupation
<b>Civilian employed population 16 years and over</b>	<b>16,222</b>	<b>100%</b>
Management, business, science, and arts occupations	4,587	28.30%
Service occupations	2,196	13.50%
Sales and office occupations	2,835	17.50%
Natural resources, construction, and maintenance occupations	1,405	8.70%
Production, transportation, and material moving occupations	5,199	32.00%

Table 14: Occupational Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

WORK CLASS CHARACTERISTICS		
Worker Class in Dalton, GA	Estimated Number of Residents	% Employed by Worker Class
<b>Civilian employed population 16 years and over</b>	<b>16,222</b>	<b>100%</b>
Private wage and salary workers	14,096	86.90%
Government workers	1,449	8.90%
Self-employed workers in own not incorporated business	614	3.80%
Unpaid family workers	63	0.40%

Table 15: Work Class Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### ***Means of Transportation to Work***

According to the 2022 5-Yr American Community Survey, an estimated 15,534 workers commute to work daily. 82.64% commuted by car, truck, or van, 14.81% carpooled, 0.01 utilized public transportation, and 2.55% did not identify their means of transportation. The data set did not provide information for workers mean travel time to work.

MEANS OF TRANSPORTATION TO WORK				
	Total	Car, truck, or van -- drove alone	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)



<b>Workers 16 years and over in households</b>	<b>15,534</b>	<b>12,837</b>	<b>2,300</b>	<b>1</b>
<b>TIME OF DEPARTURE TO GO TO WORK</b>				
12:00 a.m. to 4:59 a.m.	1.70%	1.10%	4.80%	0.00%
5:00 a.m. to 5:29 a.m.	3.70%	3.80%	3.60%	0.00%
5:30 a.m. to 5:59 a.m.	2.40%	2.80%	0.00%	0.00%
6:00 a.m. to 6:29 a.m.	11.40%	11.70%	10.60%	0.00%
6:30 a.m. to 6:59 a.m.	6.50%	6.90%	5.00%	100.00%
7:00 a.m. to 7:29 a.m.	19.40%	20.20%	16.90%	0.00%
7:30 a.m. to 7:59 a.m.	10.00%	11.20%	3.60%	0.00%
8:00 a.m. to 8:29 a.m.	8.60%	8.00%	10.30%	0.00%
8:30 a.m. to 8:59 a.m.	2.70%	3.00%	1.50%	0.00%
9:00 a.m. to 11:59 p.m.	33.60%	31.20%	43.90%	0.00%
<b>TRAVEL TIME TO WORK</b>				
Less than 10 minutes	17.40%	17.30%	17.80%	0.00%
10 to 14 minutes	21.40%	21.60%	14.20%	0.00%
15 to 19 minutes	26.70%	26.90%	29.60%	0.00%
20 to 24 minutes	15.70%	15.70%	15.70%	0.00%
25 to 29 minutes	4.70%	4.40%	7.30%	0.00%
30 to 34 minutes	7.40%	6.60%	13.40%	0.00%
35 to 44 minutes	1.80%	2.10%	0.00%	100.00%
45 to 59 minutes	3.40%	3.80%	0.30%	0.00%
60 or more minutes	1.50%	1.50%	1.70%	0.00%
<b>Mean travel time to work (minutes)</b>	<b>N</b>	<b>N</b>	<b>N</b>	<b>N</b>

Table 16: Means of Transportation: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### **Major Employers**

Hamilton Health Care System and Mohawk Industries comprise the top two largest employment markets for the City of Dalton accounting for 25% of the full-time local employment. Tandus Flooring US, Shaw Industries, and 30 Shaw Industries account for 28% of the full-time local employment.

<b>Company</b>	<b>Full-Time Local Employment</b>
<b>Shaw Industries</b>	4,477
<b>Hamilton Medical Center</b>	2,960
<b>Mohawk Industries, Inc.</b>	1,612
<b>Dalton Public Schools</b>	1,059
<b>Engineered Floors, LLC</b>	960
<b>City of Dalton (includes DU)</b>	699
<b>Tarket USA</b>	660
<b>Wal-Mart Stores, LP</b>	337
<b>Columbia Recycling Corp.</b>	250
<b>Shiroki Georgia, LLC</b>	232

Table 17: Major Employers: Source: City of Dalton Occupation Tax Report

## D. Housing Profile

Housing stock impacts the ability to access adequate housing. This includes the number, type, size and affordability of units. This is particularly important to low- and moderate-income persons, and persons in protected classes, including disabled persons, families with children, and the elderly.

### Housing Units

According to the U.S. Census, the number of housing units in Dalton has decreased by 9% from 13,132 in 2020 to 13,227 in 2022 with 90.4% of the units were occupied while 9.6% or 1,267 of the units were vacant. The City's vacancy rate decreased from 11% in 2020 to 9.5% in 2022. Furthermore, the share of renter occupied units decreased from 53.1% in 2020 to 46.6% in 2022.

Housing Unit Data		
	2020	2022
Total housing units	13,250	13,227
Occupied housing units	11,777	11,960
Vacant housing units	1,473	1,267
Homeowner vacancy rate	1.1	2
Rental vacancy rate	9.1	9.2

Table 1:

Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Housing

### Housing Stock

As shown in the following table, Dalton reported a total of 11,960 occupied housing units in 2022. Of the total occupied housing units, 6,383 housing units were owner occupied. Similarly, 5,577 units were renter occupied. The vast majority of owner-occupied housing units within the City are single-family detached units (approximately 53.4%) closely followed by units with 3 or 4 or more apartments (approximately 12.2%).

Physical Housing Characteristics for Occupied Housing Units		
<b>Occupied housing units</b>	<b>11,960</b>	<b>100.0%</b>
Owner-occupied	6,383	53.4%
Renter-occupied	5,577	46.6%
<b>Units in Structure</b>		
Total housing units	13,227	100.0%
1-unit, detached	6,445	48.7%
1-unit, attached	1,041	7.9%
2 units	507	3.8%
3 or 4 units	1,618	12.2%
5 to 9 units	1,182	8.9%

10 to 19 units	1,473	11.1%
20 or more units	775	5.9%
Mobile home	186	1.4%
Boat, RV, van, etc.	0	0.0%

Table 2: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

### Age of Structure

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original construction and continued maintenance of the unit. Using this standard, some homes found within the City constructed prior to 1970 may be approaching the end of their utility.

The table below identifies the age of year-round residential structures. The majority of the units in the City were built from 1970 to 1999 (48.4%). When considering the average life span of a dwelling unit, the homes built before 1970 will have already reached their 50-year life span. Thus, over 30% of the City’s housing units have reached their life span. These homes require regular maintenance to remain structurally sound.

Housing Stock Age		
<b>Total housing units</b>	<b>13,227</b>	<b>100%</b>
Built 2020 or later	23	0.20%
Built 2010 to 2019	680	5.10%
Built 2000 to 2009	2,210	16.70%
Built 1990 to 1999	2,271	17.20%
Built 1980 to 1989	1,895	14.30%
Built 1970 to 1979	2,230	16.90%
Built 1960 to 1969	1,335	10.10%
Built 1950 to 1959	1,538	11.60%
Built 1940 to 1949	446	3.40%
Built 1939 or earlier	599	4.50%

Table 3: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

### Overcrowding

Overcrowding is defined as more than one person per room and severe overcrowding as more than 1.5 persons per room according to HUD. As shown below approximately 4.74% of occupied housing units 2022 in the City experience overcrowding and 0.8% experience severe overcrowding.

## **Comprehensive Housing Affordability Strategy (CHAS)**

HUD's Comprehensive Housing Affordability Strategy (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. In cases where housing cost is 50% of income or greater, the household is considered severely cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

### **Income Categories**

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: 31%-50% of the AMI
- Moderate Income: 51%-80% of the AMI
- Middle and Upper Income: 80% or More of the AMI

Housing Problem categories are defined below:

"Substandard Housing – lacking complete plumbing or kitchen facilities" is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. The second housing problem identified is households living in overcrowded conditions.

There are two forms of overcrowding defined by HUD:

- Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

The final housing problem identified is cost burden. Cost burden is a fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

- Severe housing cost burden greater than 50% of income
- Housing cost burden greater than 30% of income

Overcrowding				
Occupants Per Room	2020	%	2022	%
1.00 or less occupants per room	10,928	92.79%	11,292	94.41%
1.01 to 1.50 occupants per room	740	6.28%	567	4.74%
1.51 or more occupants per room	109	0.93%	101	0.84%
<b>Total</b>	<b>11,777</b>		<b>11,960</b>	

Table 4: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Although the 2022 ACS data provides an estimate of the number of households that are cost-burdened, CHAS data provides the number and percentages of households by income level within the City of Dalton that had housing problems as well as the size and type of household. The below analysis is based on this data. The latest available CHAS data is generated from the 2016-2020 ACS data, while dated, provides detailed information about housing cost burdens for all categories.

CHAS data indicates that more rental households experience at least one housing problem in comparison to homeowners. In addition, a greater percentage of rental households are cost-burdened than homeowners.

### Housing Problems Table

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	345	1,265	1,610
Household Income >30% to <=50% HAMFI	350	1,045	1,395
Household Income >50% to <=80% HAMFI	705	1,630	2,335
Household Income >80% to <=100% HAMFI	690	720	1,410
Household Income >100% HAMFI	3,435	1,595	5,030
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>
Housing Problems Overview 1	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	790	2,615	3,405
Household has none of 4 Housing Problems OR cost burden not available no other problems	4,735	3,640	8,375
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>
Severe Housing Problems Overview 2	Owner	Renter	Total

Household has at least 1 of 4 Severe Housing Problems	465	1,535	2,000
Household has none of 4 Severe Housing Problems OR cost burden not available no other problems	5,060	4,720	9,780
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>
<b>Housing Cost Burden Overview 3</b>			
	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Cost Burden <=30%	4,945	4,005	8,950
Cost Burden >30% to <=50%	360	1,215	1,575
Cost Burden >50%	180	935	1,115
Cost Burden not available	45	100	145
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>
<b>Income by Housing Problems (Owners and Renters)</b>			
	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	1,305	300	1,610
Household Income >30% to <=50% HAMFI	905	490	1,395
Household Income >50% to <=80% HAMFI	800	1,535	2,335
Household Income >80% to <=100% HAMFI	110	1,300	1,410
Household Income >100% HAMFI	280	4,750	5,030
<b>Total</b>	<b>3,405</b>	<b>8,375</b>	<b>11,775</b>
<b>Income by Housing Problems (Renters only)</b>			
	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	1,070	195	1,265
Household Income >30% to <=50% HAMFI	825	220	1,045
Household Income >50% to <=80% HAMFI	565	1,065	1,630
Household Income >80% to <=100% HAMFI	70	650	720
Household Income >100% HAMFI	80	1,515	1,595

<b>Total</b>	<b>2,615</b>	<b>3,640</b>	<b>6,255</b>
<b>Income by Housing Problems (Owners only)</b>	<b>Household has at least 1 of 4 Housing Problems</b>	<b>Household has none of 4 Housing Problems OR cost burden not available no other problems</b>	<b>Total</b>
Household Income <= 30% HAMFI	235	105	345
Household Income >30% to <=50% HAMFI	80	270	350
Household Income >50% to <=80% HAMFI	235	470	705
Household Income >80% to <=100% HAMFI	40	650	690
Household Income >100% HAMFI	200	3,235	3,435
<b>Total</b>	<b>790</b>	<b>4,735</b>	<b>5,525</b>
<b>Income by Cost Burden (Owners and Renters)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	1,220	915	1,610
Household Income >30% to <=50% HAMFI	790	180	1,395
Household Income >50% to <=80% HAMFI	520	10	2,335
Household Income >80% to <=100% HAMFI	35	15	1,410
Household Income >100% HAMFI	120	0	5,030
<b>Total</b>	<b>2,685</b>	<b>1,115</b>	<b>11,775</b>
<b>Income by Cost Burden (Renters only)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	1,000	780	1,265
Household Income >30% to <=50% HAMFI	720	155	1,045
Household Income >50% to <=80% HAMFI	405	0	1,630
Household Income >80% to <=100% HAMFI	10	0	720
Household Income >100% HAMFI	15	0	1,595
<b>Total</b>	<b>2,150</b>	<b>935</b>	<b>6,255</b>
<b>Income by Cost Burden (Owners only)</b>	<b>Cost burden &gt; 30%</b>	<b>Cost burden &gt; 50%</b>	<b>Total</b>
Household Income <= 30% HAMFI	225	135	345
Household Income >30% to <=50% HAMFI	65	20	350
Household Income >50% to <=80% HAMFI	115	10	705
Household Income >80% to <=100% HAMFI	30	15	690
Household Income >100% HAMFI	105	0	3,435
<b>Total</b>	<b>540</b>	<b>180</b>	<b>5,525</b>

Table 5: HUD CHAS Data, <https://www.huduser.gov/portal/datasets/cp.html#year2006-2020>



Overall, both renters and owners in elderly households and small-related households experience a similar degree of housing problems as well as cost-burden and severe cost-burden. Low income elderly households, low income small related rental households, and moderate income small related owner households were most impacted by cost burden. Extremely low income households across all categories experienced greater incidences of severe cost burden. Large related households is the group most disproportionately affected by housing problems. Although large related renter households is the group most impacted with cost burden, the level of cost burden and severe cost burden for large related households is proportionate to owners and renters in the other household types examined. This indicates that affordability is not the greatest obstacle for large households in Dalton.

The following table identifies 2,615 renter households and 790 owner households who live in substandard housing. Households tenured by renters within the 0%-30% AMI group tend to experience higher rates of cost burden than those households with higher incomes, and households tenured by owners within the >50-80% AMI income group.

<b>Housing Problems</b>			
	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household has at least 1 of 4 Housing Problems	790	2,615	3,405
Household has none of 4 Housing Problems OR cost burden not available, no other problems	4,735	3,640	8,375
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>
<b>Severe Housing Problems Overview 2</b>			
	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Household has at least 1 of 4 Severe Housing Problems	465	1,535	2,000
Household has none of 4 Severe Housing Problems OR cost burden not available, no other problems	5,060	4,720	9,780
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>
<b>Housing Cost Burden Overview 3</b>			
	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Cost Burden <=30%	4,945	4,005	8,950
Cost Burden >30% to <=50%	360	1,215	1,575
Cost Burden >50%	180	935	1,115
Cost Burden not available	45	100	145
<b>Total</b>	<b>5,525</b>	<b>6,255</b>	<b>11,775</b>

Table 6: Source: HUD IDIS Output, September 2023: 2013-2017 CHAS

### Housing Costs

Housing costs fluctuate with market forces and are difficult to define. Several sources have been consulted that provide a picture of the overall housing market. In 2024, the median value of an owner-occupied housing unit in the City was \$301,732 and the median rent was \$1,364.

## Homeownership

According to realtor.com, a real estate search and analytics site, the median listed sales price for a housing unit in 2024 was \$348,000 with a median sales price of \$270,000.

### Home Values, Dalton, GA

#### Home values in Dalton, GA

Dalton is a city in Georgia. There are 302 homes for sale, ranging from \$15K to \$11M. Dalton have affordable condo/townhomes, affordable multi-families, and affordable 2 bedroom listings.

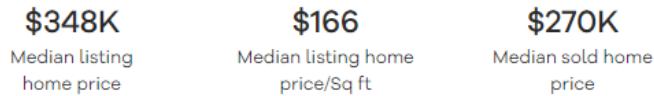


Figure 1: Realtor.com, [https://www.realtor.com/realestateandhomes-search/Dalton\\_GA/overview](https://www.realtor.com/realestateandhomes-search/Dalton_GA/overview)

## Rental Housing

HUD establishes fair market rents (FMR) through area median income and provides FMR data by unit size. This is HUD’s way of estimating what a household seeking a rental unit could expect to pay in rent and utilities in the current market. The table below provides the FY 2024 FMR for the City.

### FY 2024 Dalton, GA HUD Metro FMR Area FMRs for All Bedroom Sizes

Final FY 2024 & Final FY 2023 FMRs By Unit Bedrooms					
Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2024 FMR	\$656	\$737	\$968	\$1,263	\$1,381
<a href="#">FY 2023 FMR</a>	\$590	\$655	\$862	\$1,138	\$1,159

Figure 2: HUD User, [https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2024\\_code/2024summary.odn](https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2024_code/2024summary.odn)

## Housing Affordability

In 2024, the median renter household income is \$1,044. Using the industry standard of three (3) times income to afford a median priced home in Dalton, a household would need to earn \$41,755.00 annually to affordably own a three-bedroom home in Dalton.

**Georgia**                      **Dalton**

Annual Income Needed to Afford		
ZERO-BEDROOM	\$43,250	\$23,600
ONE-BEDROOM	\$44,810	\$26,200
TWO-BEDROOM	\$51,479	\$34,480
THREE-BEDROOM	\$64,508	\$45,520
FOUR-BEDROOM	\$77,602	\$46,360

Figure 3: Source: National Low Income Housing Coalition, <https://reports.nlihc.org/oor/georgia>

According to the 2022 American Community Survey, median contract rent in Dalton was \$852 monthly. Renters households earning less than \$20,000 are paying more than 30 percent of their income in housing costs, which indicates a significant cost burden for lower income households.

GROSS RENT		
<b>Occupied units paying rent</b>	<b>6,443</b>	<b>100%</b>
<b>Less than \$300</b>	803	1.60%
<b>\$300 to \$499</b>	1,655	4.00%
<b>\$500 to \$799</b>	3,052	36.10%
<b>\$800 to 999</b>	1,892	23.40%
<b>\$1,000 to \$1,499</b>	2,835	27.40%
<b>\$1,500 to \$1,999</b>	870	1.60%
<b>\$2,000 to \$2,499</b>	231	0.50%
<b>\$2,500 to \$2,999</b>	196	0.90%
<b>\$3,000 or more</b>	206	0.70%
<b>No Cash Rent</b>	220	3.90%
<b>Median (dollars)</b>	852	

Table 7: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

### Renter Monthly Housing Costs as a Percentage of Household Income

Less than \$20,000	351	11.6%
Less than 20 percent	68	2.3%
20 to 29 percent	67	2.2%
30 percent or more	216	7.2%
\$20,000 to \$34,999	472	15.7%
Less than 20 percent	308	10.2%
20 to 29 percent	95	3.2%
30 percent or more	69	2.3%
\$35,000 to \$49,999	324	10.7%
Less than 20 percent	299	9.9%

20 to 29 percent	25	0.8%
30 percent or more	0	0.0%
\$50,000 to \$74,999	533	17.7%
Less than 20 percent	533	17.7%
20 to 29 percent	0	0.0%
30 percent or more	0	0.0%
\$75,000 or more	1,293	42.9%
Less than 20 percent	1,268	42.1%
20 to 29 percent	25	0.8%
30 percent or more	0	0.0%

Table 8: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

ACS data for 2022 indicates that Dalton has 4,684 owners with mortgages and approximately 35.4 percent of homeowners are paying \$1,000 to \$1,499 for their mortgage closely followed by 22 percent of households paying \$1,500 to \$1,999. A total of 174 or 5.2 percent of households earning \$50,000 to \$74,999 pay more than 30 percent of their income in housing costs.

#### Housing Units with a Mortgage

Total Housing units with a mortgage		4,684
Less than \$200	0	0.0%
\$200 to \$399	73	2.2%
\$400 to \$599	30	0.9%
\$600 to \$799	320	9.5%
\$800 to \$999	520	15.4%
\$1,000 to \$1,499	1,191	35.4%
\$1,500 to \$1,999	740	22.0%
\$2,000 to \$2,499	194	5.8%
\$2,500 to \$2,999	148	4.4%
\$3,000 or more	153	4.5%
Median (dollars)	1,315	

Table 9: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

#### Owner Monthly Housing Costs as a Percentage of Household Income

	Estimate	%
Less than \$20,000	92	2.7%
Less than 20 percent	0	0.0%
20 to 29 percent	0	0.0%
30 percent or more	92	2.7%
\$20,000 to \$34,999	132	3.9%
Less than 20 percent	0	0.0%
20 to 29 percent	4	0.1%

30 percent or more	128	3.8%
\$35,000 to \$49,999	151	4.5%
Less than 20 percent	0	0.0%
20 to 29 percent	64	1.9%
30 percent or more	87	2.6%
\$50,000 to \$74,999	776	23.0%
Less than 20 percent	115	3.4%
20 to 29 percent	487	14.5%
30 percent or more	174	5.2%
\$75,000 or more	2,218	65.8%
Less than 20 percent	1,813	53.8%
20 to 29 percent	340	10.1%
30 percent or more	65	1.9%

Table 10: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimate

### **Subsidized Multi-family Affordable Housing Stock**

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety of income groups and ages such as the elderly. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing. The following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in the City of Dalton.

#### **E. Public Housing Authority (PHA) Administrative Plan Review**

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. 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. Since 2005, the Dalton Housing Authority has not participated in an approved Public Housing Agency Plan through HUD.

Other subsidized housing options within the City, include low income housing tax credit multifamily developments. According to HUD's Low Income Housing Tax Credit [LIHTC] database, the City has 213 low income units located throughout the City. The following is a listing of LIHTC properties.

### City of Dalton Low Income Tax Credit Housing

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
GA20040010	AUTUMN RIDGE	850 AUTUMN CT	DALTON	GA	30721	130	117
GAA20010045	DAWNVILLE MEADOWS	556 HORSESHOE WAY	DALTON	GA	30721	120	96

Table 11: Source: HUD Low-Income Housing Tax Credit Database.  
<https://lihtc.huduser.gov/>

### Location of Subsidized Housing

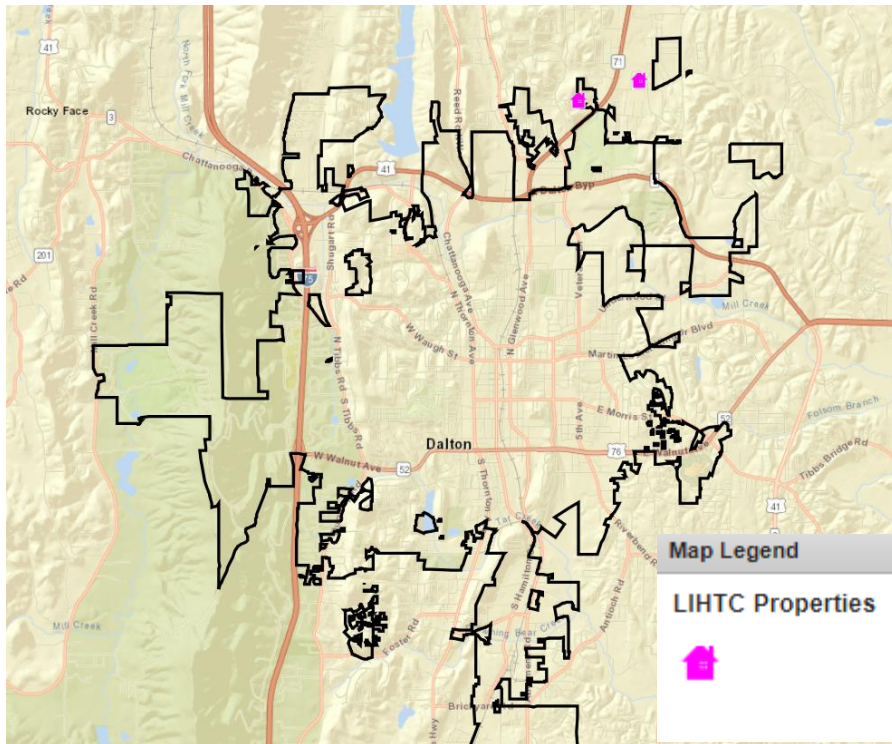


Figure 4: Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

## Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for disabled persons you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a disabled person as “ any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment.

The most recent data comprehensive data on disability status among Dalton’s population was the U.S. Census 2022 American Community Survey. According to the 2022 ACS, 11.5 percent (3,845 persons) of civilian non-institutionalized population reported a disability. The data included the following breakdown of the disabled population by age group. The highest percentage of disabilities occurs in the 65 and over population group (45.2%) and to 64 category has the next largest number of disabled persons.

**Disability Status of the Civilian Non-Institutionalized Population**

	Total	With a disability	Percent with a disability
<b>Total civilian noninstitutionalized population</b>	2,423	59	2.4%
<b>Under 5 years</b>	6,452	476	7.4%
<b>5 to 17 years</b>	8,704	439	5.0%
<b>18 to 34 years</b>	11,823	1,400	11.8%
<b>35 to 64 years</b>	2,126	550	25.9%
<b>65 to 74 years</b>	2,038	921	45.2%

Table 12: Source: US Census, [www.data.census.gov](http://www.data.census.gov)

The 2022 American Community Survey also provides information regarding type of disabilities within the Dalton population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the city, representing 4.9% of all disabilities in Dalton. The least common disability reported among Dalton residents was vision difficulty.

### Disability Type

	With a Disability	Percent with a Disability
<b>With a hearing difficulty</b>	1,034	3.10%
<b>With a vision difficulty</b>	860	2.60%
<b>With a cognitive difficulty</b>	1,181	3.80%
<b>With an ambulatory difficulty</b>	1,607	5.20%
<b>With a self-care difficulty</b>	684	2.20%
<b>With an independent living difficulty</b>	1,495	6.10%

Table 13: Source: US Census, [www.data.census.gov](http://www.data.census.gov)

### Housing Stock Available to Elderly Persons

According to the 2022 U.S. Census, there are 2,559 elderly persons (over 65 years of age) living in Dalton comprising 41.6% of the population. Of the 2,559 elderly persons, 1,284 persons (20.8%) are age of 75 and over and are considered to be extra elderly or frail elderly. The population over 55 years of age makes up a smaller percentage of the overall population however, this segment of the population has been growing significantly faster than the younger age groups.

### Demographic Characteristics for Occupied Housing Units

Selected Age Categories	Estimate	%
<b>Owner-Occupied Housing Units</b>		
Under 35 years	775	12.1%
35 to 44 years	1,152	18.0%
45 to 54 years	1,217	19.1%
55 to 64 years	1,373	21.5%
65 to 74 years	874	13.7%
75 to 84 years	807	12.6%
85 years and over	185	2.9%
<b>Renter-occupied housing units</b>		
Under 35 years	1,833	32.9%
35 to 44 years	1,117	20.0%
45 to 54 years	991	17.8%
55 to 64 years	943	16.9%
65 to 74 years	398	7.1%
75 to 84 years	178	3.2%
85 years and over	117	2.1%

Table 14: Source: US Census, [www.data.census.gov](http://www.data.census.gov)



## **F. Home Mortgage Disclosure Act (HMDA) Data and Analysis**

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2022 was analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 Fair Housing Act prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.

The Equal Credit Opportunity Act was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.

The Community Reinvestment Act was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.

Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application. The analysis presented herein is from the HMDA data system.

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Both types of lending institutions must meet the following set of reporting criteria:

- The institution must be a bank, credit union, or savings association;
- The total assets must exceed the coverage threshold;
- The institution must have had an office in a Metropolitan Statistical Area (MSA);
- The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
- The institution must be federally insured or regulated; and

The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

- The institution must be a for-profit organization;
- The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
- The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year; and
- The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. While HMDA data are available for more years than are presented in the following pages, modifications were made in 2016 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual

institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and with retrieval software on compact disk. Data can be retrieved or ordered at their website <http://www.ffiec.gov/hmda/hmdaproducts.htm>. The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose. These loans were for the purchase of an owner-occupied, one-to-four family dwelling, as reported by HMDA.

### Loans Purchased, by location of property and type of loan, 2022

MSA/MD: 19140 - Dalton, GA														
CENSUS TRACT OR COUNTY NAME (COUNTY/STATE/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans													
	A		B		C		D		E		F		G	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C,		Loans On Manufactured Home Dwellings From Columns A, B, C, & D	
Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	
Whitfield County/Georgia/000101	6	1420000	2	380000	4	940000	0	0	0	0	0	0	1	115000
Whitfield County/Georgia/000103	10	2670000	5	1555000	5	1155000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/000104	11	2515000	1	155000	7	1255000	0	0	0	0	0	0	1	155000
Whitfield County/Georgia/000200	7	1395000	4	770000	5	965000	0	0	0	0	0	0	1	115000
Whitfield County/Georgia/000301	6	1090000	0	0	4	650000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/000303	5	1145000	2	440000	2	430000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/000304	4	780000	0	0	4	790000	0	0	0	0	0	0	1	155000
Whitfield County/Georgia/000401	6	980000	1	245000	3	645000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/000402	10	2290000	2	240000	0	0	0	0	0	0	0	0	0	0
Whitfield County/Georgia/000501	3	635000	3	955000	1	505000	0	0	0	0	0	0	1	155000
Whitfield County/Georgia/000502	3	525000	4	850000	0	0	0	0	0	0	1	295000	0	0
Whitfield County/Georgia/000600	7	1465000	6	820000	1	135000	0	0	0	0	1	165000	0	0
Whitfield County/Georgia/000700	12	2120000	8	2020000	5	875000	1	65000	0	0	0	0	0	0
Whitfield County/Georgia/000801	2	400000	0	0	0	0	0	0	0	0	0	0	1	185000
Whitfield County/Georgia/000802	7	1765000	3	985000	2	350000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/000900	7	1495000	8	2520000	1	145000	1	55000	0	0	1	135000	0	0
Whitfield County/Georgia/001000	7	985000	1	5000	0	0	0	0	0	0	0	0	0	0
Whitfield County/Georgia/001100	1	175000	5	885000	1	105000	0	0	0	0	0	0	1	175000
Whitfield County/Georgia/001200	15	3545000	6	1230000	2	250000	0	0	0	0	1	175000	0	0
Whitfield County/Georgia/001300	3	445000	1	115000	1	125000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/001400	8	1830000	5	1255000	4	820000	0	0	0	0	0	0	0	0
Whitfield County/Georgia/001500	18	3940000	5	1145000	3	545000	0	0	0	0	0	0	0	0

Table 15: FFIEC HMDA, <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2022/GA/19140/2>

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract that comprises the City of Dalton. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the citywide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

For purposes of this analysis, a “minority” tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Dalton as a whole. In order to accurately portray HMDA data for the City, only those tracts that were either entirely within the City or whose area fell predominantly within City boundaries were utilized. Certain

tracts where only a small area fell within the City boundaries were excluded from the calculations. It should be noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data is available for the three-year period, the most recent years, 2022.

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process; “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

Among the tracts analyzed, there were 365 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 180 (46.9) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

Disposition of loan applications, by race and sex of applicant, 2022												
MSA/MD: 19140 - Dalton, GA												
RACE AND SEX	Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
<b>RACE</b>												
<b>American Indian or Alaska Native</b>												
Male	13	2115000	3	395000	12	1520000	1	115000	2	250000	0	0
Female	6	1020000	1	85000	6	630000	2	250000	1	95000	0	0
Joint	1	605000	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>20</b>	<b>3740000</b>	<b>4</b>	<b>480000</b>	<b>18</b>	<b>2150000</b>	<b>3</b>	<b>365000</b>	<b>3</b>	<b>345000</b>	<b>0</b>	<b>0</b>
<b>Asian</b>												
Male	24	4290000	0	0	8	1300000	0	0	5	1365000	1	275000
Female	14	2680000	0	0	3	245000	6	1270000	5	605000	0	0
Joint	7	1325000	0	0	1	35000	1	485000	2	680000	2	740000
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>45</b>	<b>8295000</b>	<b>0</b>	<b>0</b>	<b>12</b>	<b>1580000</b>	<b>7</b>	<b>1755000</b>	<b>12</b>	<b>2650000</b>	<b>3</b>	<b>1015000</b>
<b>Black or African American</b>												
Male	23	3905000	0	0	14	2130000	7	735000	4	580000	0	0
Female	19	3625000	1	135000	16	154890000	10	2000000	4	510000	0	0
Joint	19	4065000	0	0	6	660000	5	1455000	1	75000	1	255000
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>61</b>	<b>11595000</b>	<b>1</b>	<b>135000</b>	<b>36</b>	<b>157680000</b>	<b>22</b>	<b>4190000</b>	<b>9</b>	<b>1165000</b>	<b>1</b>	<b>255000</b>
<b>Native Hawaiian or Other Pacific Islander</b>												
Male	2	210000	0	0	1	25000	0	0	0	0	0	0
Female	1	195000	0	0	0	0	0	0	1	265000	0	0
Joint	0	0	0	0	1	145000	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>405000</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>170000</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>265000</b>	<b>0</b>	<b>0</b>
<b>White</b>												
Male	858	151510000	37	5245000	337	46145000	240	45300000	130	18380000	20	3670000
Female	540	85340000	23	3735000	257	28385000	123	20995000	91	10915000	11	2485000
Joint	806	158580000	50	10460000	266	36540000	176	117140000	89	13485000	21	5045000
Sex Not Available	5	835000	2	250000	4	650000	1	145000	1	35000	0	0
<b>Total</b>	<b>2209</b>	<b>396265000</b>	<b>112</b>	<b>19690000</b>	<b>864</b>	<b>111720000</b>	<b>540</b>	<b>183580000</b>	<b>311</b>	<b>42815000</b>	<b>52</b>	<b>11200000</b>
<b>2 or more minority races</b>												
Male	0	0	0	0	1	105000	1	75000	0	0	0	0
Female	1	145000	0	0	0	0	2	240000	0	0	0	0
Joint	0	0	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>145000</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>105000</b>	<b>3</b>	<b>315000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Male	0	0	0	0	1	95000	0	0	0	0	0	0
Female	1	275000	0	0	0	0	0	0	0	0	0	0
Joint	27	6555000	2	220000	8	880000	7	1655000	9	895000	2	360000
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>28</b>	<b>6830000</b>	<b>2</b>	<b>220000</b>	<b>9</b>	<b>975000</b>	<b>7</b>	<b>1655000</b>	<b>9</b>	<b>895000</b>	<b>2</b>	<b>360000</b>
<b>Free Form Text Only</b>												
Male	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0
Joint	0	0	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Race Not Available</b>												
Male	90	16260000	7	1115000	55	7195000	29	5465000	23	3405000	2	320000
Female	47	8025000	7	985000	36	4450000	22	3380000	11	1355000	1	205000
Joint	60	11250000	5	735000	28	4000000	19	4235000	7	1315000	0	0
Sex Not Available	186	43240000	10	4140000	61	10135000	73	16455000	33	4565000	393	76965000
<b>Total</b>	<b>383</b>	<b>78775000</b>	<b>29</b>	<b>6975000</b>	<b>180</b>	<b>25780000</b>	<b>143</b>	<b>29535000</b>	<b>74</b>	<b>10640000</b>	<b>396</b>	<b>77490000</b>

Table 16: FFIEC, HMDA, <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2022/GA/19140/3>

Overall, the data indicates that the elevated denial rate among tracts appears to be based on the income and racial/ethnic characteristics of the tract. The HMDA data also suggests that there may be discriminatory lending based on race/ethnicity of property location within the City of Dalton as well as income characteristics. A definitive conclusion would require a greater degree of analysis taking into consideration additional data not available from HMDA at the geographic level specific to the City of Dalton.

## **G. Segregation, Integration & RECAPs**

### **Segregation Indices**

Residential segregation can be measured using statistical tools called the dissimilarity index and the isolation index. These indices measure the degree of separation between racial or ethnic groups living in a community. An extreme example of segregation would be an exactly equivalent split between predominantly high income, White, suburban communities and low income, minority, inner-city neighborhoods. For this analysis, racial statistics for each census tract in the municipality were compared. Since White residents are the majority in the City, all other racial and ethnic groups were compared to the White population as a baseline.

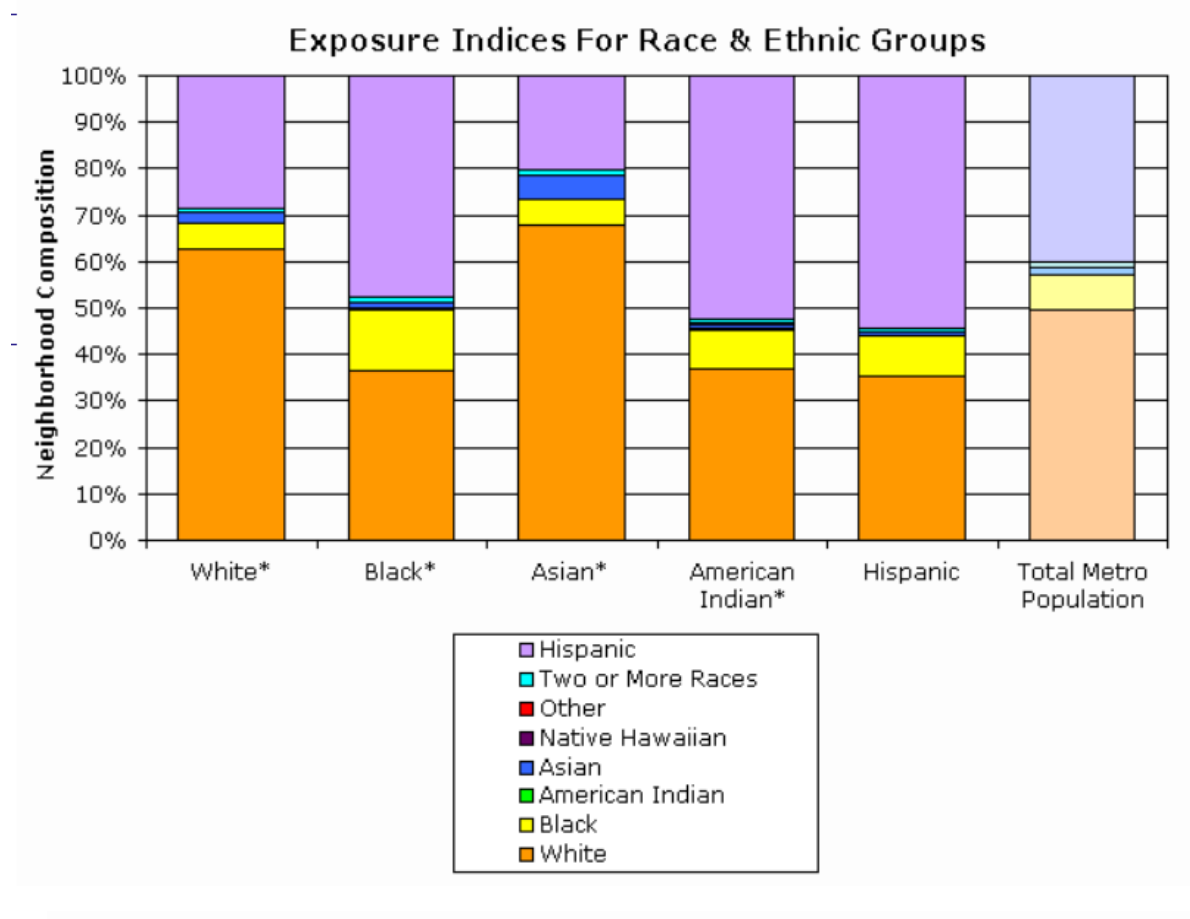
The index of dissimilarity allows for comparisons between subpopulations (i.e. different races), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. Typically, a score under 30 is considered low, between 30 and 60 is moderate, and above 60 is high.

The index of isolation compares the proportion of a group in a neighborhood to the proportion of the group in a larger area. Conceptually, the isolation index measures the extent of exposure or the probability that a member of a minority group will interact with only other members of that group. For example, if Hispanics tend to live in almost entirely Hispanic neighborhoods, the isolation index will be high. The isolation index is rated on a scale from 0 to 100, in which a score of 0 corresponds to maximum interaction and a score of 100 represents complete isolation. Dissimilarity and isolation are related to each other. The main difference is that the dissimilarity index does not take into account the relative size of the groups, but the isolation index does.

The history of housing segregation is marked by implicit and explicit forms of social and spatial discrimination including redlining, segregation, and disparities in lending. The result of these practices around the country was the enactment of the Fair Housing Act in 1968, which was designed to address inequality in mortgage lending and homeownership and curb explicit discriminatory practices by landlords who avoided renting to minorities. Since the enactment of the FHA, progress has been made, but patterns of segregation and housing discrimination remain major impediments to social and economic mobility for those identified as protected classes. This chapter explores segregation and integration patterns in Dalton using federal and local data to understand segregation and its impact on city residents.

Unless there is complete integration, the average racial composition of neighborhoods where whites live differs from the average racial composition of neighborhoods lived in by blacks, by Hispanics, or by other groups. To examine this, we calculate the average racial composition of neighborhoods experienced by members of each racial group. These are sometimes referred to as "exposure indices". This is because they show the exposure a given race group experiences with members of their own and each other race (percentage to 100) in an average neighborhood of the city (or metropolitan area) being examined. In the table below, the first five columns represent the average racial composition of the neighborhood of a person of a given race.

### Dalton City



### Exposure Indices for Racial Groups

	White*	Black*	American Indian*	Asian*	Native Hawaiian*	Other*	Mixed*	Hispanic	Total
White*	62.7%	5.4%	0.1%	2.2%	0.1%	0.1%	0.9%	28.5%	100.0%
Black*	36.6%	13.2%	0.2%	1.3%	0.0%	0.1%	1.0%	47.7%	100.0%
Asian*	67.9%	5.6%	0.1%	4.8%	0.2%	0.1%	1.1%	20.3%	100.0%
American Indian*	37.0%	8.2%	0.6%	0.9%	0.0%	0.0%	1.0%	52.3%	100.0%
Hispanic	35.2%	8.7%	0.2%	0.8%	0.0%	0.1%	0.8%	54.2%	100.0%
Total Metro Population	49.7%	7.3%	0.2%	1.6%	0.0%	0.1%	0.9%	40.2%	100.0%

\* Non-Hispanic only.

Figure 5: Source: Census Scope, [https://www.censusscope.org/us/s47/p51560/chart\\_exposure.html](https://www.censusscope.org/us/s47/p51560/chart_exposure.html)

## SEGREGATION: DISSIMILARITY INDICES

The dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. If a city's white-black dissimilarity index were 65, that would mean that 65% of white people would need to move to another neighborhood to make whites and blacks evenly distributed across all neighborhoods.

### Dissimilarity Indices

	Dissimilarity Index With Whites*	Population**	Percent of Total Population
<b>White*</b>	--	13,867	49.68%
<b>Black*</b>	50.1	2,042	7.32%
<b>American Indian*</b>	57.2	45	0.16%
<b>Asian*</b>	39.7	458	1.64%
<b>Native Hawaiian*</b>	75.4	13	0.05%
<b>Other*</b>	61.9	19	0.07%
<b>Two or More Races*</b>	30.6	249	0.89%
<b>White/Black*</b>	44.4	75	0.27%
<b>White/American Indian*</b>	51.9	51	0.18%
<b>White/Asian*</b>	67.4	29	0.10%
<b>White/Other*</b>	52.0	42	0.15%
<b>Other Combinations*</b>	--	52	0.19%
<b>Hispanic</b>	48.1	11,219	40.19%
<b>Total</b>	--	27,912	100.00%

\* Non-Hispanic only.

\* When a group's population is small, its dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Thus, when a group's population is less than 1,000, exercise caution in interpreting its dissimilarity indices.

Figure 6 Census Scope [https://censusscope.org/us/s13/p21380/chart\\_dissimilarity.html](https://censusscope.org/us/s13/p21380/chart_dissimilarity.html)



### III. ACCESS TO OPPORTUNITY

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Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services, and amenities, which are critical factors to consider when measuring fair housing choice. Social research has demonstrated negative effects of residential segregation on income and opportunity for minority families, who are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.”<sup>1</sup> Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.<sup>2</sup>

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity” model based on research developed by The Kirwan Institute for the Study of Race and Ethnicity at Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region. The Institute argues that “we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in ‘free market’ opportunities.”

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity, “comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities,” according to the Institute.

#### **Overview of HUD-Defined Opportunity Factors**

Among the many factors that drive housing choice for individuals and families are neighborhood characteristics including access to quality schools, jobs, transit, and a healthy environment. To measure these conditions at a neighborhood level, HUD developed a methodology to quantify the

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<sup>1</sup> Orfield, Myron. “Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation.” *Fordham Urban Law Journal*. Volume 33, Issue 3, 2005.

<sup>2</sup> Turner, Margery, et al. “Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000. Urban Institute. Online: [huduser.org/Publications/pdf/Phase1\\_Report.pdf](http://huduser.org/Publications/pdf/Phase1_Report.pdf)

degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, job proximity, transportation costs, transit trips, and environmental health. In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs. In this way, limited housing choices reduce access to opportunity for many protected classes.

The following sections provide definitions of each opportunity indicator as defined in HUD’s AFFH-T Data Documentation and the description of Dalton’s findings for each index. Values for each factor range from 0-to-100 with zero representing a low score and less access to opportunity and one hundred representing a high score and more access to opportunity. Higher scores, and darker shading on the figures, indicate a greater access to opportunity<sup>3</sup>.

### Low Poverty Index

The Low Poverty Index measures poverty in a community, a higher score represents a more prosperous community with lower levels of poverty. This indicator measures rates of family poverty and the receipt of public assistance, such as cash welfare. The table below shows Poverty Index scores across race and ethnicity in Dalton.

In this table, it is shown that the Black Non-Hispanic and the Asian or Pacific Islander, Non-Hispanic communities are the least prosperous and experience the most poverty in the city. The Asian/Pacific Islander and Native American non-Hispanic communities experience poverty less than other racial/ethnic groups. In contrast, the Asian/Pacific Islander community is more prosperous in the region. Other racial/ethnic groups factors are similar in the jurisdiction and region.

Low Poverty Index		
	Dalton, GA CDBG Jurisdiction	Dalton, GA Region
<b>Total Population</b>		
White, Non-Hispanic	34.51	37.42
Black, Non-Hispanic	23.44	31.3
Hispanic	24.69	29.85
Asian or Pacific Islander, Non-Hispanic	36.25	42.13
Native American, Non-Hispanic	30.98	33.96
<b>Population below federal poverty line</b>		

<sup>3</sup> Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data & Maps, <https://egis.hud.gov/affht/>

White, Non-Hispanic	26.66	34.55
Black, Non-Hispanic	21.6	29.18
Hispanic	20.95	28.03
Asian or Pacific Islander, Non-Hispanic	18.1	38.86
Native American, Non-Hispanic	29.42	34.57

Table 17. HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

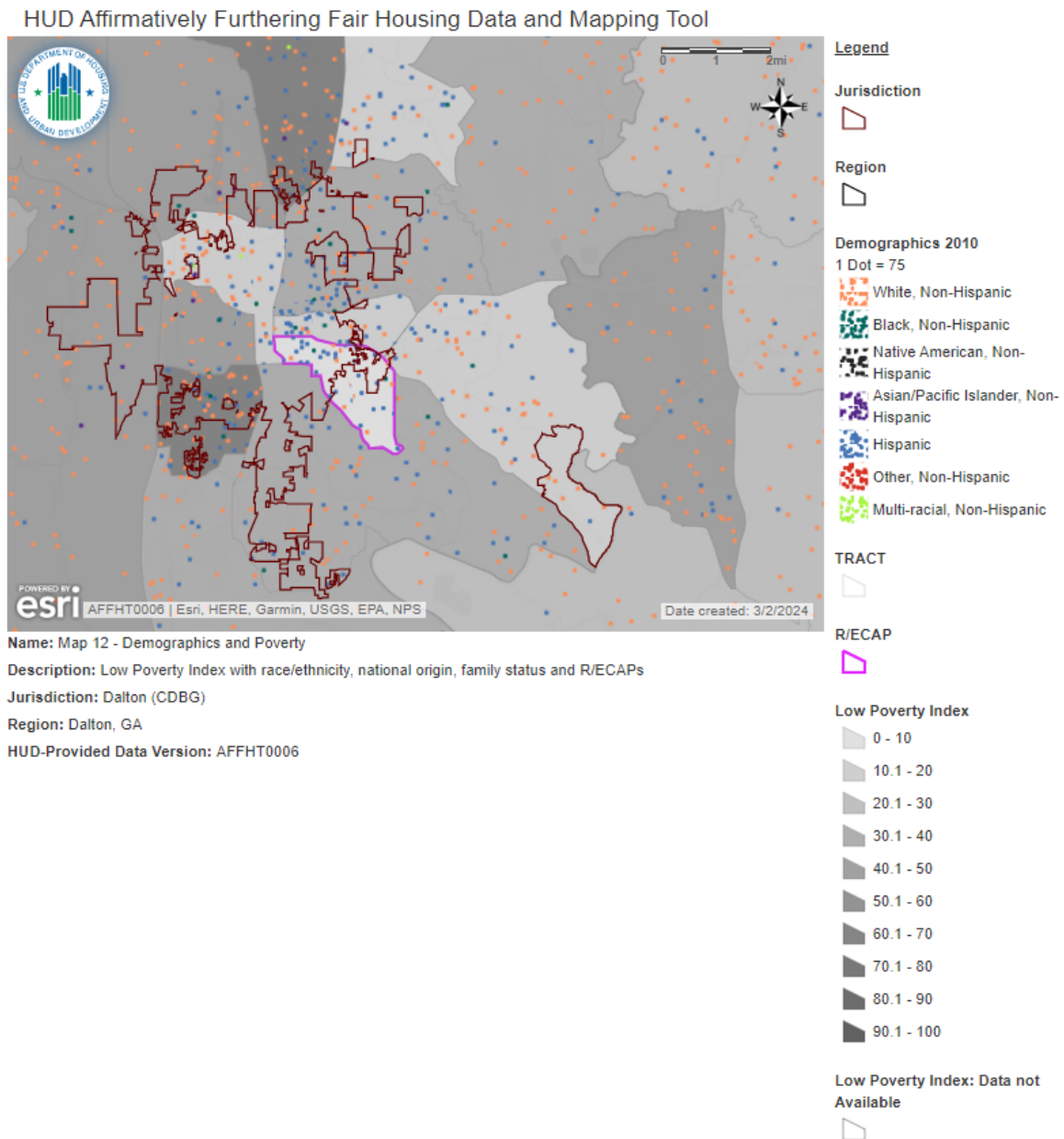


Figure 7: Low Poverty Index -HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### School Proficiency Index

The School Proficiency Index measures the quality of the school systems in a community. The higher the score, the higher the school system met HUD’s definition of proficiency. This indicator uses school-level data on the performance of fourth-grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools.

In the School Proficiency Index table below, it is shown that in Dalton, the White, Non-Hispanic community has the most access to quality schools even when in poverty. While the Hispanic and Black Non-Hispanic communities have the least access to quality schools in the city. The same characteristics exist for the Region in which the Hispanic and Black Non-Hispanic communities have the least access to quality schools.

School Proficiency Index		
	Dalton, GA CDBG Jurisdiction	Dalton, GA Region
<b>Total Population</b>		
White, Non-Hispanic	33.14	41.87
Black, Non-Hispanic	22.38	32.45
Hispanic	23.55	32.89
Asian or Pacific Islander, Non-Hispanic	31.77	37.31
Native American, Non-Hispanic	33.66	40.34
<b>Population below federal poverty line</b>		
White, Non-Hispanic	26.40	40.59
Black, Non-Hispanic	18.38	24.74
Hispanic	23.18	29.61
Asian or Pacific Islander, Non-Hispanic	21.89	41.59
Native American, Non-Hispanic	25.14	31.83

Table 18: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

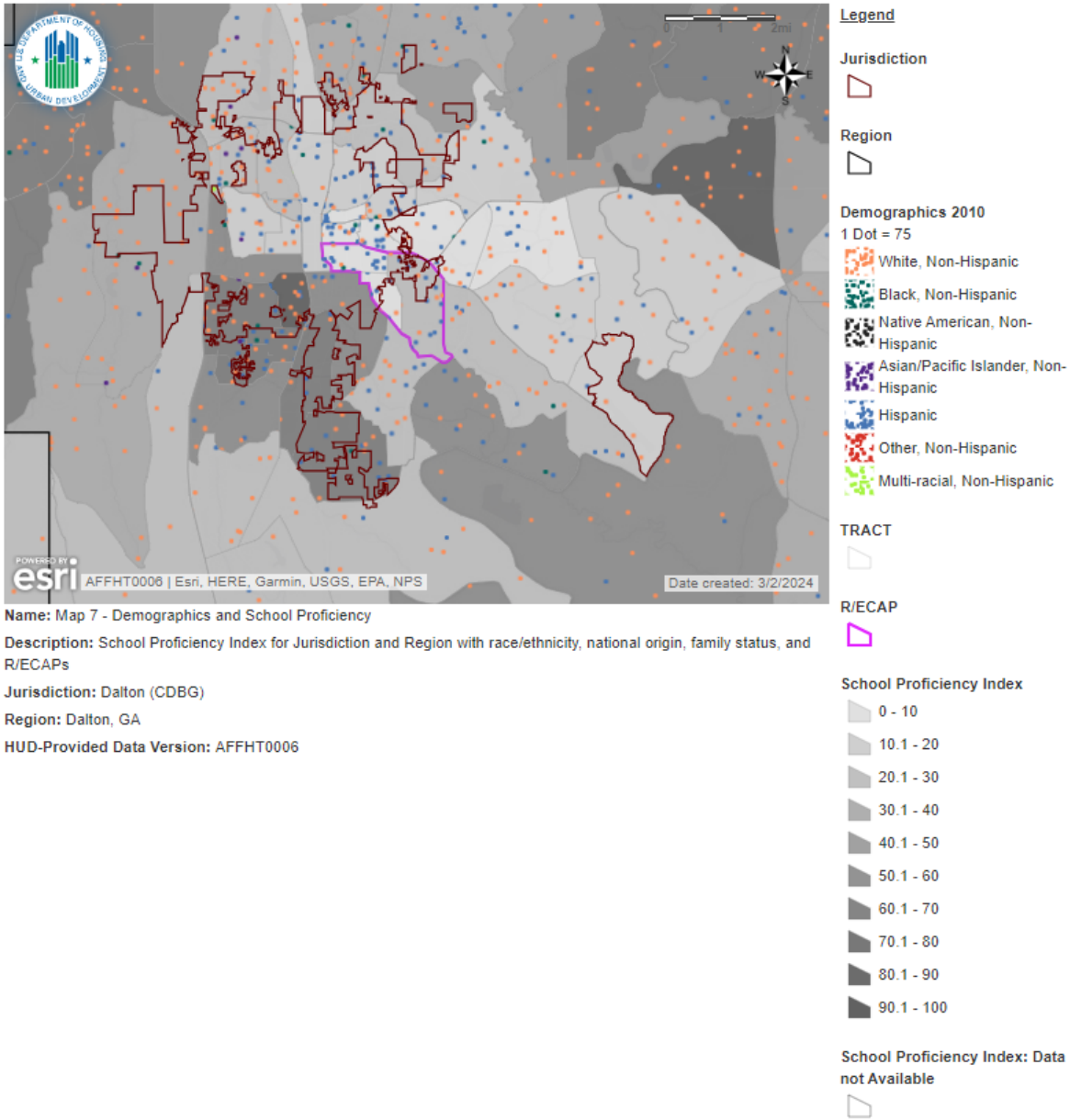


Figure 8: School Proficiency Index -HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

**Labor Market Engagement Index**

The Labor Market Engagement Index measures a community’s level of employment, labor force participation, and educational attainment in a community the higher the score, and the higher the opportunity for engagement in the labor market. Dalton is the economic hub of northwest Georgia and continues to benefit economically from the floor-covering industry’s production of carpet, rugs, and luxury vinyl flooring. Dalton is home to three of the largest carpet producers in the world (Shaw

Industries, Mohawk Industries, and Engineered Floors) and is the third largest manufacturing community per capita in Georgia. Like every U.S. City, Dalton’s economy has been impacted by the novel coronavirus pandemic (COVID-19). Due to our strong manufacturing base and large retail big box stores, Dalton remained open for the most part of the pandemic. The tourism and locally owned small businesses have been impacted the most, but 2022 reflected robust hotel-motel tax revenue that exceeded pre-pandemic levels by 17% and sales tax collections county-wide exceeded pre-pandemic levels by 34%.

In the table below, Asian or Pacific Islander Non-Hispanic and White Non-Hispanic and Hispanic communities have the most labor market engagement even when in poverty. In contrast, the Black, Non-Hispanic and Native American, Non-Hispanic communities have the least Labor market engagement. In the Dalton Region, the higher labor market engagement varies slightly as Black, Non-Hispanic individuals are more engaged in the labor market despite being below the federal poverty line.

<b>Labor Market Index</b>		
	<b>Dalton, GA CDBG Jurisdiction</b>	<b>Dalton, GA Region</b>
<b>Total Population</b>		
White, Non-Hispanic	33.72	29.12
Black, Non-Hispanic	25.41	28.58
Hispanic	24.09	25.29
Asian or Pacific Islander, Non-Hispanic	36.00	36.37
Native American, Non-Hispanic	25.68	25.73
<b>Population below federal poverty line</b>		
White, Non-Hispanic	26.87	27.27
Black, Non-Hispanic	25.64	28.79
Hispanic	20.70	24.41
Asian or Pacific Islander, Non-Hispanic	21.22	28.25
Native American, Non-Hispanic	25.61	23.72

Table 19: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

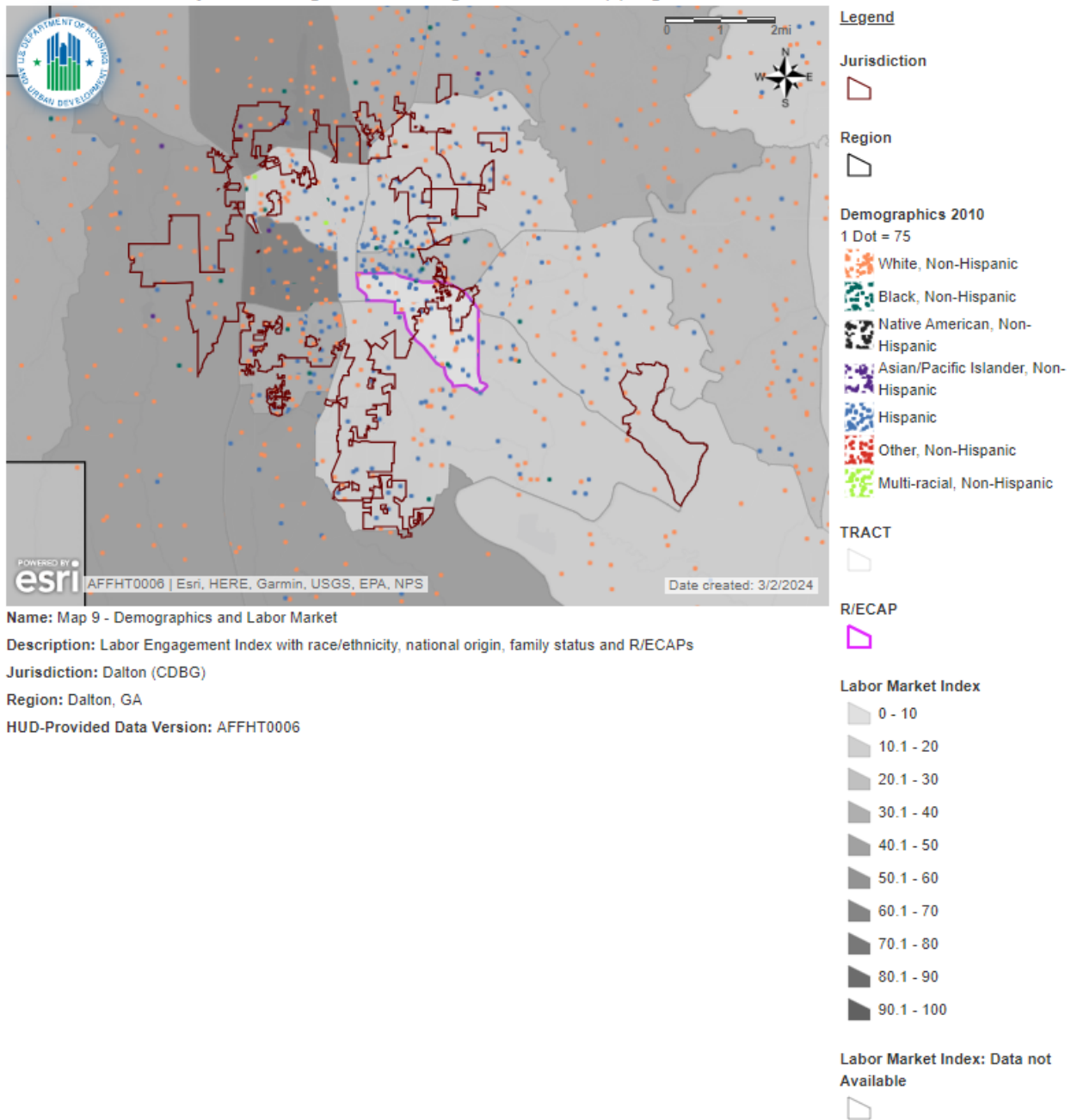


Figure 9: Low Engagement Index -HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Transit Index

The Transit Index measures the utilization of public transportation in a community. Transit access describes the accessibility of amenities using public transit. The higher the score, the more likely residents in that community utilize public transit. This indicator estimates transit trips

taken by families that: are a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)).

Based on the parameters described above, transit use is utilized at a consistent rate across racial and ethnic communities within the Dalton Jurisdiction and Region. The Black, Non-Hispanic community below the poverty utilizes transit at the highest rate based on scores.

Transit Index		
	Dalton, GA CDBG Jurisdiction	Dalton, GA Region
<b>Total Population</b>		
White, Non-Hispanic	28.94	17.05
Black, Non-Hispanic	30.21	21.55
Hispanic	29.68	21.83
Asian or Pacific Islander, Non-Hispanic	29.66	21.45
Native American, Non-Hispanic	26.69	18.12
<b>Population below federal poverty line</b>		
White, Non-Hispanic	29.52	18.82
Black, Non-Hispanic	31.57	26.80
Hispanic	30.52	22.33
Asian or Pacific Islander, Non-Hispanic	30.30	24.56
Native American, Non-Hispanic	25.74	19.62

Table 20: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>



## HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

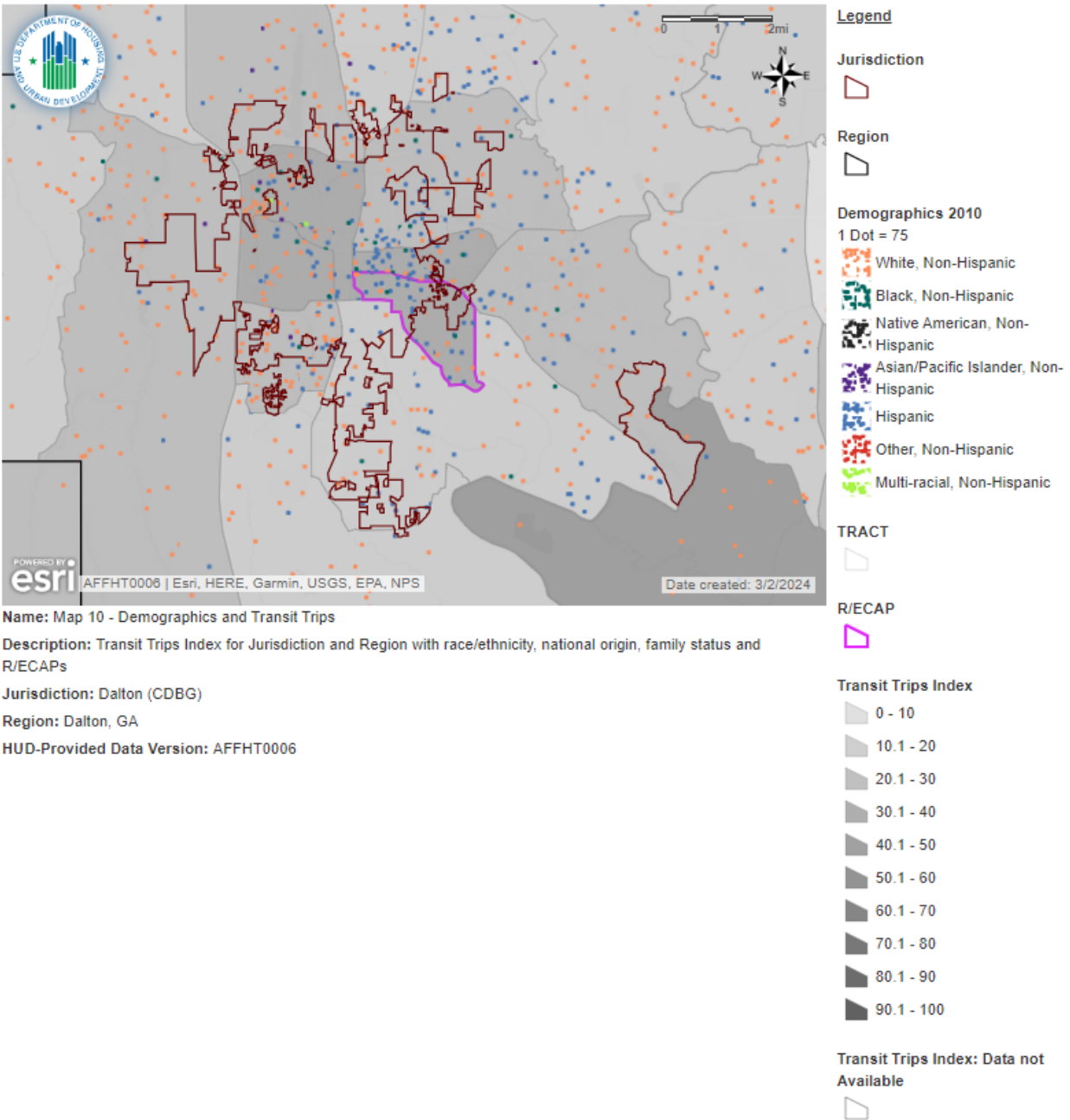


Figure 10: Transit Trips Index -HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### Low Transportation Cost Index

The Low Transportation Cost Index estimates transportation costs for families that are a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., MSA).

The table below shows the Low Transportation Cost Index scores across race and ethnicity. In this table, it is shown that Black, Non-Hispanic and Asian, Non-Hispanic communities have the lowest transit costs. In comparison, for the Dalton Region, Native-American, Non-Hispanic communities spend less on transit.

Low Transportation Cost Index		
	Dalton, GA CDBG Jurisdiction	Dalton, GA Region
<b>Total Population</b>		
White, Non-Hispanic	18.61	14.62
Black, Non-Hispanic	21.42	22.13
Hispanic	20.66	20.17
Asian or Pacific Islander, Non-Hispanic	19.03	17.63
Native American, Non-Hispanic	18.98	16.17
<b>Population below federal poverty line</b>		
White, Non-Hispanic	20.37	17.03
Black, Non-Hispanic	21.66	26.26
Hispanic	22.09	20.13
Asian or Pacific Islander, Non-Hispanic	24.20	20.74
Native American, Non-Hispanic	15.32	32.93

Table 21: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

# HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

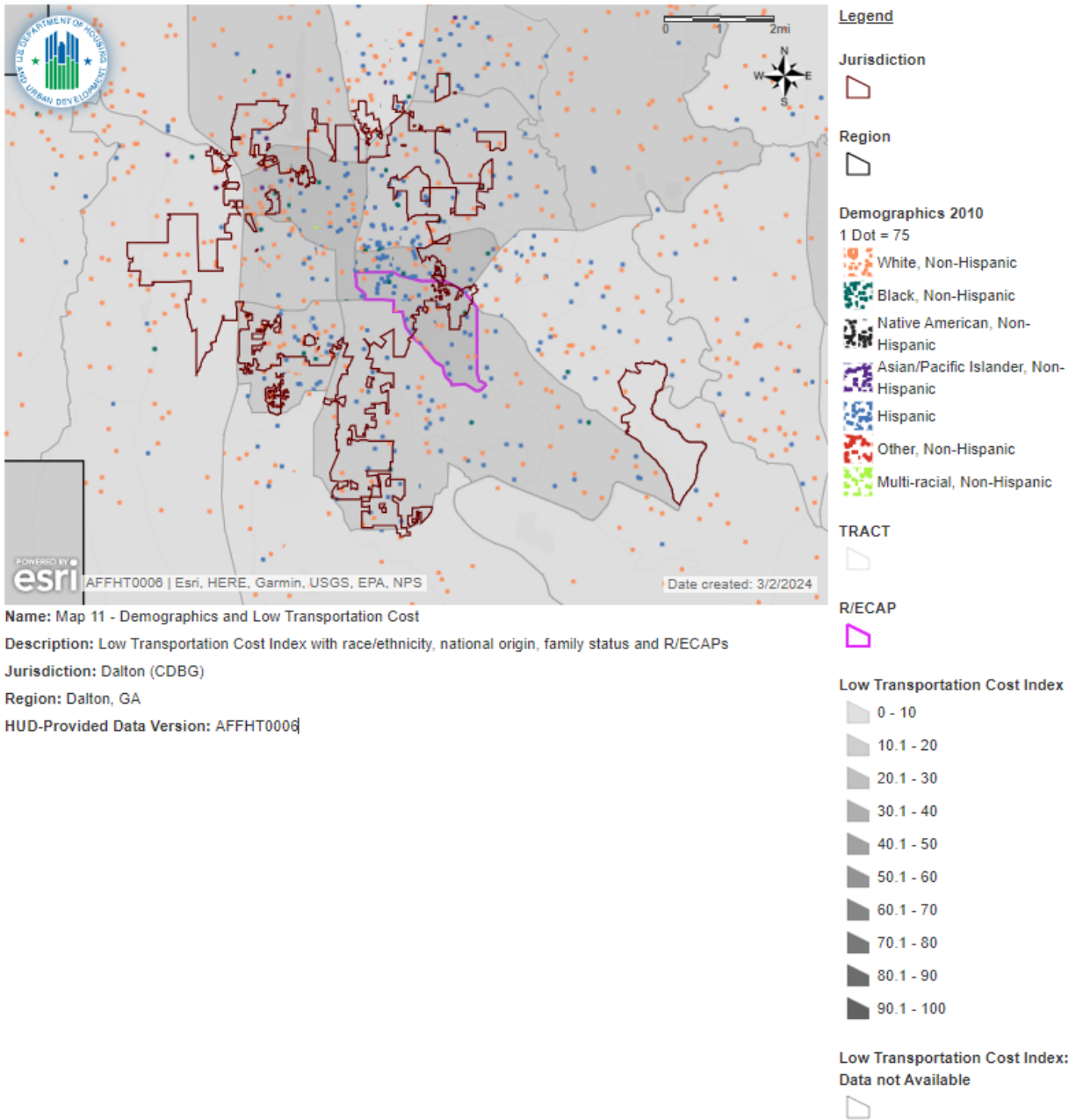


Figure 11: Low Transportation: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## Jobs Proximity Index

The Jobs Proximity Index measures the distance of job locations from a community. Greater weight is given to larger employment centers. The competition for a job location measured by labor supply is inversely weighted. The table below reflects the Jobs Proximity Index scores across race and ethnicity. In this table, it is displayed that the total population lives close to where they work in Dalton than, comparatively, in the Region. Native American, Non-Hispanic community lives the furthest from jobs in the jurisdiction.

Job Proximity Index		
	Dalton, GA CDBG Jurisdiction	Dalton, GA Region
<b>Total Population</b>		
White, Non-Hispanic	74.77	41.94
Black, Non-Hispanic	76.65	60.30
Hispanic	77.52	62.18
Asian or Pacific Islander, Non-Hispanic	72.72	58.32
Native American, Non-Hispanic	74.61	44.89
<b>Population below federal poverty line</b>		
White, Non-Hispanic	74.16	44.41
Black, Non-Hispanic	74.80	64.61
Hispanic	77.23	65.02
Asian or Pacific Islander, Non-Hispanic	79.22	48.38
Native American, Non-Hispanic	64.69	37.38

Table 22: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

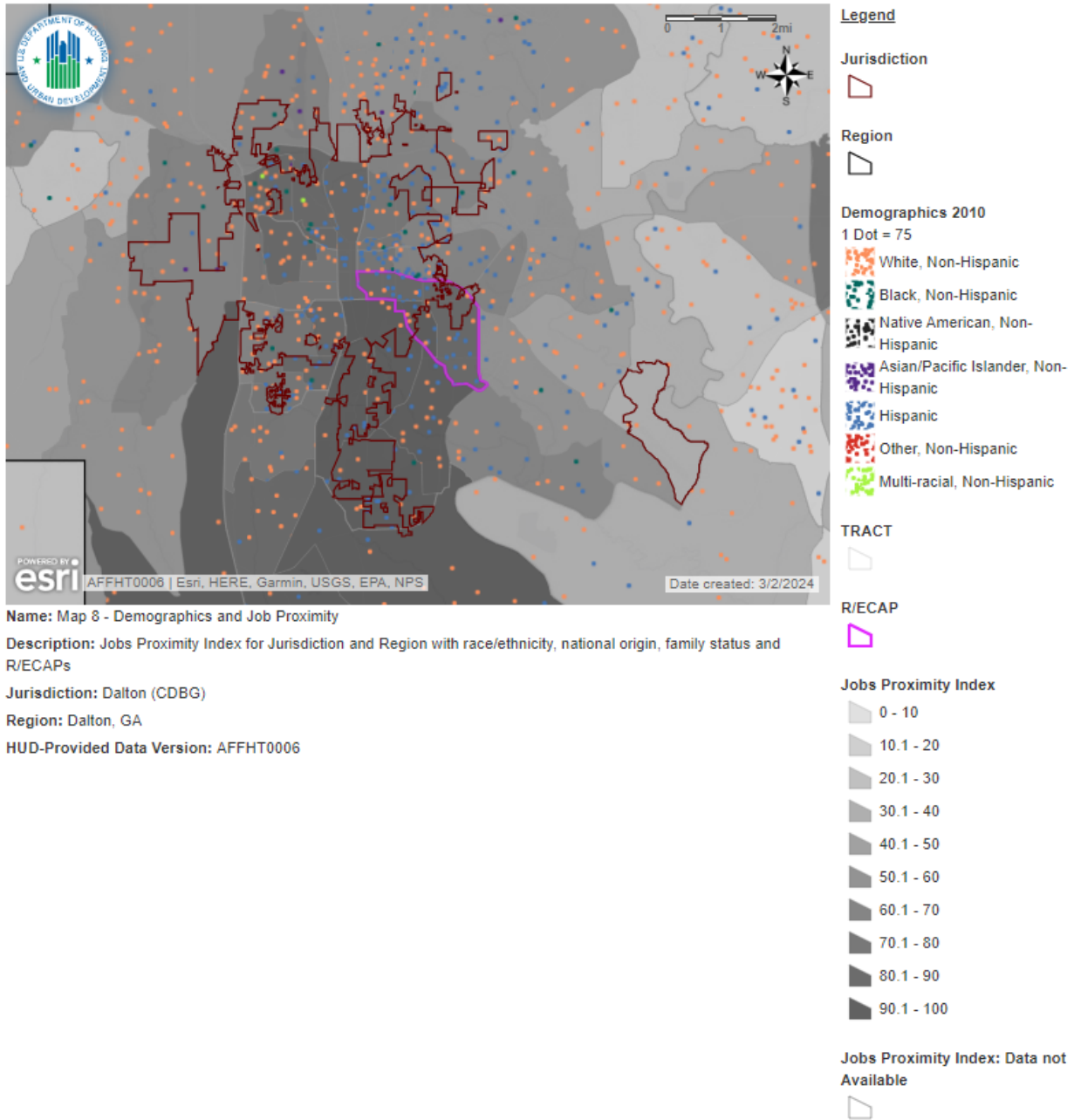


Figure 12: Jobs Proximity: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

**Environmental Health Index**

The environmental health index measures the environmental quality of a community. The higher the score, the less exposure a community has to harmful environmental toxins. The index measures the potential for exposure to harmful toxins within a community, as determined by the Environmental Protection Agency’s Toxic Release Inventory by volume and toxicity. As reflected

in the table below, the Environmental Health Index scores for Dalton are listed by race, ethnicity, and poverty. In this table, it is displayed that all racial/ethnic groups have similar exposure risk to environmental toxins in Dalton. In comparison, in the Region, the Black, non-Hispanic community has the greatest exposure for environmental toxins of the total population.

Environmental Health Index		
	Dalton, GA CDBG Jurisdiction	Dalton, GA Region
<b>Total Population</b>		
White, Non-Hispanic	19.47	31.88
Black, Non-Hispanic	17.97	22.44
Hispanic	17.81	23.52
Asian or Pacific Islander, Non-Hispanic	19.85	24.50
Native American, Non-Hispanic	19.78	31.07
<b>Population below federal poverty line</b>		
White, Non-Hispanic	19.18	31.80
Black, Non-Hispanic	17.03	19.44
Hispanic	17.59	23.39
Asian or Pacific Islander, Non-Hispanic	19.04	26.18
Native American, Non-Hispanic	19.83	33.72

Table 23: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

# HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

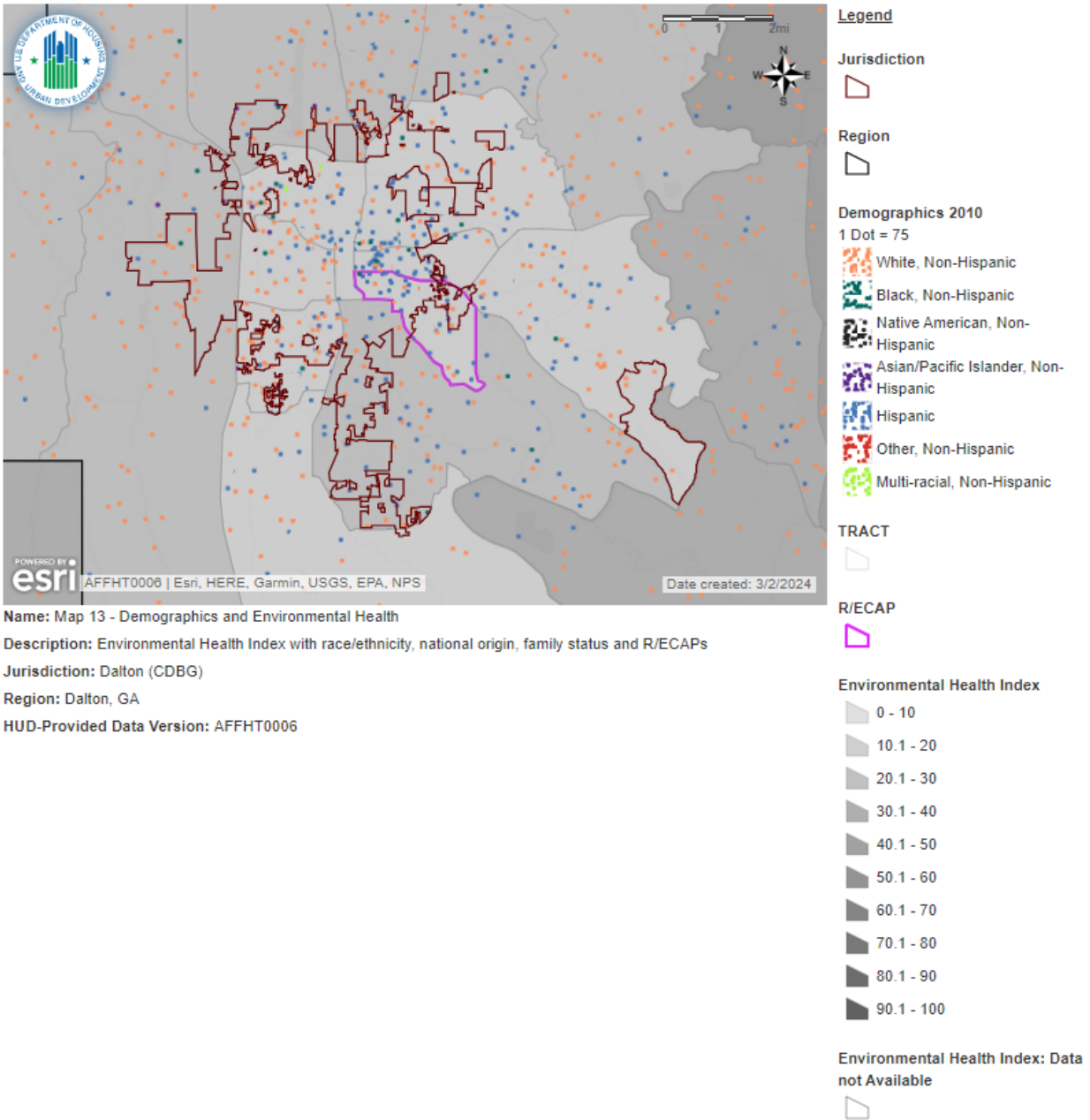


Table 7: Environmental Health- HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## **V. REVIEW OF PRIOR AND CURRENT FAIR HOUSING ACTIONS**

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### **Affirmatively Furthering Fair Housing**

Affirmatively furthering fair housing requires overcoming historic patterns of segregation, promoting fair housing choice, and fostering an inclusive community. Identifying Dalton's barriers to fair housing calls for the development of comprehensive strategies and timely actions to overcome existing impediments.

The Analysis of Impediments assesses previous actions taken and current conditions that may continue to restrict housing choice for people protected under State and federal fair housing laws.

With such an assessment in mind, this section presents the previously identified impediments to fair housing choice and a summary of the actions taken to address those challenges. The analysis and its results will help outline the underlying conditions and trends still relevant in Dalton.

Effective Tuesday, September 8, 2020, HUD's "Preserving Community and Neighborhood Choice" Final Rule officially repealed HUD's 2015 housing rule known as "Affirmatively Furthering Fair Housing" or AFFH and the 1994 Analysis of Impediments to Fair Housing Choice (A.I.) where they appear in regulation. HUD's new housing rule is intended to lessen the paperwork burden on local grantees and empowering entitlement communities by giving them maximum flexibility in designing and implementing sound policies that reflect local needs by eliminating overly burdensome, intrusive, and inconsistent reporting and monitoring requirements.

HUD's new rule will still require that grantees commit to "use funds to take active steps to promote fair housing", however, the grantee AFFH certifications will be deemed sufficient provided the grantee took any action during the relevant time period related to promoting fair housing.

### **Previous Impediments to Fair Housing Choice**

The previously identified impediments to fair housing choice in Dalton's 2024 AI are listed below. The impediments identified are not listed in any order or priority. The analysis and status of these impediments are based on the data available at the time and the feedback provided by community members and stakeholders. An analysis of past and existing trends is further addressed in other sections of this document.

As presented in the 2019 Analysis of Impediments to Fair Housing Choice, the barriers identified in 2019 provided the City a path forward in furthering fair housing protections in the jurisdiction. Assessing the status of these actions helps to inform the current trends that may continue to limit fair housing choice in Dalton. The following are detailed



descriptions of the impediments as presented in the 2019 Analysis of Impediments assessment:

IMPEDIMENT	DESCRIPTION AND ACTIONS UNDERTAKEN
<p><b>Lack of Affordable Housing for Dalton Residents</b></p>	<p><b>Description:</b></p> <p>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.</p> <p><b>Recommendations</b></p> <p>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.</p> <p><b>Actions Undertaken:</b></p> <ul style="list-style-type: none"> <li>• The city funded the Housing Authority of the City of Dalton with CDBG funds to make improvements to housing for low-income residents.</li> <li>• The city supported the development of new tax credit developments and other multi-family projects such as Dalton Station to provide more housing solutions for residents.</li> </ul>
<p><b>Inadequate Fair Housing Education and Awareness in Community especially for LEP populations</b></p>	<p><b>Description:</b></p> <p>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.</p> <p><b>Recommendations</b></p> <p>The City of Dalton should expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.</p> <p><b>Actions Undertaken:</b></p> <ul style="list-style-type: none"> <li>• The published all ads in Spanish newspapers and expanded outreach efforts to inform them of their rights.</li> </ul>

Table 24: Source: Dalton, GA 2019 Analysis of Impediments,  
<https://www.daltonga.gov/finance/page/analysis-impediments-fair-housing-choice>

## VI. IMPEDIMENTS TO FAIR HOUSING CHOICE

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The following are the identified impediments based on the assessment conducted throughout the 2024 Analysis of Impediments to Fair Housing Choice process. The new identified impediments to fair housing access and choice represent ongoing issues in Dalton, GA. Of the previously identified impediments, a lack of public awareness of fair housing laws, concentration of low-income housing, mortgage lending practices and denial rates among certain races, lack of landlord tenant coordination and limited public transportation are still present in the City and will continue to be addressed. Below is a list of impediments:

### **Impediment 1: Housing Affordability/Cost Burden**

High rents in relationship to the earnings of average workers put housing affordability out of the reach for many. Housing is the largest monthly cost for most households. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

Citywide, 13% of households spend over 50% of their income on housing costs. White households and Hispanic households face severe cost burdening at the same rate, 12%. Black households disproportionately face a high rate of severe cost burdening than the jurisdiction as a whole at 23%, spending more than 50% of their income on housing costs.

### **Recommendations:**

- Leverage Tenant Based Rental Assistance as an interim solution for housing affordability.
- Explore re-purposing of existing real estate to include strip malls and extended stay hotels into rental units, including single room occupancy (SRO) options.
- Provide tax incentives for apartment owners or owners of secondary residential properties who are willing to set aside a certain number of their existing apartments / homes as affordable housing.
- Encourage more private sector investment in existing affordable housing properties to supplement federally funded efforts.
- Develop Economic Development activities that will provide opportunities for small businesses to grow their customer base in their pursuit of sustainability.

## **Impediment 2: Inadequate Fair Housing Education and Awareness in Community especially for LEP populations**

As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

### **Recommendations:**

- 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.
- Expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.
- Fund and promote Fair Housing Education and Housing Counseling activities with CDBG Public Service funds.
- Develop a Fair Housing Education Campaign to increase public awareness of fair housing rights.
- Seek public and private partners to disseminate fair housing information to residents.

## VII. CONCLUSION

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Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of Dalton. These barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. The City will work diligently toward achieving fair housing choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. The City has an important role to play but cannot on its own bring about the change necessary to remove these impediments to fair housing choice.

The recommendations proposed in this document address impediments relative to the need for fair housing education, the age of housing stock, unequal distribution of resources, disparities in lending practices, and location of affordable housing. Implementation of the recommendations can assist the city in achieving the reality of an open and inclusive region that truly embraces fair housing choice for all its residents.

# APPENDIX

## PUBLIC NOTICE FOR NEEDS ASSESSMENT

**YOUR INPUT IS NEEDED!**

**COMPLETE THE SURVEY OR ATTEND A WORKSHOP**

**SCAN HERE**



The City of Dalton, Georgia is conducting a Needs Assessment to inform the priorities of the next 5-Year Consolidated Plan.

**CLICK OR COPY LINK BELOW**

<https://www.surveymonkey.com/r/DaltonNeeds>

The Consolidated Plan identifies general community needs and provides a five-year strategy for how HUD grant funds will be used to develop community resources that meet those needs.

**ATTEND A MEETING**



**FEB 1 @ 9:00 AM**

**OR**

**FEB 1 @ 11:00 AM**

Mack Gaston  
Community Center  
218 North Frederick Street  
Dalton, GA 30721



300 W Waugh Street, Dalton, GA 30720



706.529.2470



[cdbg@daltonga.gov](mailto:cdbg@daltonga.gov)



# TU ENTRADA ES NECESARIO!

 ¡COMPLETA EL QUESTIONARIO O ASISTIR A UNA REUNIÓN!

ESCANEA AQUÍ 



HAGA CLIC O COPIE EL ENLACE A CONTINUACIÓN 

<https://www.surveymonkey.com/r/DaltonNecesidades>

La Ciudad de Dalton, Georgia está llevando a cabo una Evaluación de Necesidades para informar las prioridades del próximo Plan Consolidado de 5 Años y Análisis de los impedimentos para la elección de vivienda justa.

¡ASISTIR A UNA REUNIÓN! 

FEB 1 @ 9:00 AM

OR

FEB 1 @ 11:00 AM

Mack Gaston  
Community Center  
218 North Frederick Street  
Dalton, GA 30721

El Plan Consolidado identifica las necesidades generales de la comunidad y proporciona una estrategia de cinco años sobre cómo se utilizarán los fondos de subvención de HUD para desarrollar recursos comunitarios que satisfagan esas necesidades.



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